

Exhibit No. 11

Exhibit No.:
Issue: COVID Demand Impact on Test
Year, Weather Normalization, AMI
Witness: Albert R. Bass, Jr.
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Evergy Missouri Metro and Evergy
Missouri West
Case No.: ER-2022-0129 / 0130
Date Testimony Prepared: August 16, 2022

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2022-0129 / 0130

SURREBUTTAL TESTIMONY

OF

ALBERT R. BASS, JR.

ON BEHALF OF

EVERGY MISSOURI METRO and EVERGY MISSOURI WEST

**Kansas City, Missouri
August 2022**

SURREBUTTAL TESTIMONY

OF

ALBERT R. BASS, JR.

Case No. ER-2022-0129 / 0130

I. INTRODUCTION

1

2 **Q: Please state your name and business address.**

3 A: My name is Albert R. Bass, Jr. My business address is 1200 Main, Kansas City, Missouri
4 64105.

5 **Q: Are you the same Albert R. Bass, Jr. who submitted direct and rebuttal testimony in**
6 **these dockets?**

7 A: Yes.

8 **Q: On whose behalf are you testifying?**

9 A: I am testifying on behalf of Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy
10 Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy
11 Missouri West”) (collectively, the “Company” or “Evergy”).

12 **Q: What is the purpose of your surrebuttal testimony?**

13 A: The purpose of my surrebuttal testimony is to respond to weather normalization, COVID
14 adjustment, Evergy Missouri Metro residential class issues raised by MPSC Staff witness,
15 Michael L. Stahlman and Net Metering weather normalization raised by MPSC Staff
16 witness Kim Cox.

1 **Q: Did Evergy use the same time period for its weather normalization as MPSC Staff?**

2 A: Yes, In Evergy’s true-up filing, Evergy adjusted the weather normalization period to
3 January 2021 through December 2021 to align with Staff.

4 **Q: Did Evergy perform multiple COVID adjustments?**

5 A: No. Evergy performed a single COVID adjustment separate from any weather adjustment.
6 Each MetrixND class project file contains multiple simulations so that: 1) the weather
7 adjustment is isolated, 2) the COVID adjustment is isolated and 3) the weather and COVID
8 adjustment are simulated together in order to be directly imported from the MetrixND
9 class project files to MetrixLT class project files so that both weather and COVID
10 adjustments are accounted for in the peak calculations. The weather and COVID
11 adjustments applied to the test year billing determinants are from the MetrixND
12 simulations that isolate weather and COVID adjustments separately.

13 **Q: Is the Google Mobility data utilized by Evergy for adjusting billing determinants for
14 COVID related behaviors a good measurement of changes in geolocation behavior
15 due to COVID-19?**

16 A: Yes. The Google Mobility data provides information about geolocation movements
17 relative to a six-week pre-COVID baseline. As stated by Google, the intended purpose of
18 the data made public: “As global communities respond to COVID-19, we’ve heard from
19 public health officials that the same type of aggregated, anonymized insights we use in
20 products such as Google Maps could be helpful as they make critical decisions to combat
21 COVID-19 and as These Community Mobility Reports aim to provide insights into what
22 has changed in response to policies aimed at combating COVID-19. The reports chart
23 movement trends over time by geography, across different categories of places such as

1 retail and recreation groceries and pharmacies, parks, transit stations, workplaces, and
2 residential.” Even though the major impact from COVID has subdued, the data still
3 provides insight into the continuing changing market place. Both Evergy and Staff found
4 that the Google Mobility data was a significant explanatory variable when included in a
5 regression model to predict Evergy class load.

6 **Q: Did the Company incorrectly adjust Evergy Missouri Metro billing determinants for**
7 **weather during Winter Storm Uri?**

8 A: No. Staff witness Michael Stahlman expressed concern that Evergy’s weather
9 adjustment for February 2021 and March 2021 billing months was consistent with
10 heating degree days being below normal (temperature being warmer than normal) even
11 though winter storm Uri occurred during this time producing colder than normal weather
12 conditions. The Company’s weather adjustment on a daily basis during the dates of
13 Winter Storm Uri (February 13-17, 2021) are consistent with heating degree days above
14 normal (temperature being colder than normal). While much of February 2021 did
15 experience heating degree days above normal, both January 2021 and March 2021
16 experienced heating degree days below normal. Due to the nature of customer billing
17 cycles, February billing determinants are impacted by weather occurring on days in both
18 January and February, while March billing determinants are affected by weather
19 occurring on days in both February and March. The impact to Evergy’s class loads due to

1 milder than normal weather in both January and March of 2021 is enough to offset the
2 impact from extreme weather caused by Winter Storm Uri during a five-day period.

3 **Q: Do you agree with MPSC Staff witness Kim Cox that Net Metering customers**
4 **should not be weather normalized?**

5 A: No, I do not. Ms. Cox states, “The amount of kWh the customer uses in any given month
6 is adjusted for net metering and therefore is not true representation of the amount of kWh
7 used in that month.” The amount of kWh a net metering customer uses and is billed in any
8 given month is their actual usage, and that usage is weather sensitive like any other usage
9 by non-net metered customers. Net metering is a billing function where a customer may
10 consume their own generated energy and are paid a credit at the parallel generation rate for
11 any power that is exported back to the system. The kWh provided to the customer is
12 delivered to the customer and is not offset or adjusted by net metering. The kWh used by
13 and billed to a net metering customer is impacted by the weather and therefore “weather
14 sensitive” and should be adjusted for the impacts of weather.

15 **Q: Does that conclude your testimony?**

16 A: Yes, it does.

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Evergy Metro, Inc. d/b/a Evergy)
Missouri Metro's Request for Authority to) Case No. ER-2022-0129
Implement A General Rate Increase for Electric)
Service)

In the Matter of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West's Request for Authority to) Case No. ER-2022-0130
Implement A General Rate Increase for Electric)
Service)

AFFIDAVIT OF ALBERT R. BASS, JR.

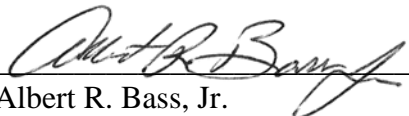
STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Albert R. Bass, Jr., being first duly sworn on his oath, states:

1. My name is Albert R. Bass, Jr. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Sr. Manager of Energy Forecasting and Analytics.

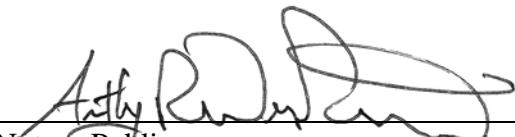
2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of Evergy Missouri Metro and Evergy Missouri West consisting of four (4) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.



Albert R. Bass, Jr.

Subscribed and sworn before me this 15th day of August 2022.



Notary Public

My commission expires: 4/26/2025

