

Exhibit No.:  
Issue: Incentive, Storm Reserve, Sibley  
Retirement Costs, AFUDC,  
CIS/CFP  
Witness: Ronald A. Klote  
Type of Exhibit: Surrebuttal and True-Up Direct  
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 & TRUE-UP DIRECT TESTIMONY**

**OF**

**RONALD A. KLOTE**

**ON BEHALF OF**

**EVERGY MISSOURI METRO and EVERGY MISSOURI WEST**

**Kansas City, Missouri  
August 2022**

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**SURREBUTTAL TESTIMONY**

**OF**

**RONALD A. KLOTE**

**Case No. ER-2022-0129 /0130**

1 **I. INTRODUCTION AND PURPOSE**

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

3 A: My name is Ronald A. Klotz. My business address is 1200 Main, Kansas City, Missouri  
4 64105.

5 **Q: Are you the same Ronald A. Klotz 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” or “EMM”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri  
11 West (“Evergy Missouri West” or “EMW”) (collectively, the “Company”).

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

13 A: The purpose of my surrebuttal testimony is to respond to portions of the rebuttal  
14 testimonies of certain Missouri Public Service Commission Staff (“Staff”) and the Office  
15 of the Public Counsel (“OPC”) witnesses . Those issues are as follows:

16 Incentive Compensation – OPC Angela Schaben

17 Storm Reserve – Staff Karen Lyons

18 Sibley Retirement Costs --OPC John Robinette and Staff Keith Majors

19 Other Capital Cost Issues – AFUDC – OPC David Murray

2 **II. INCENTIVE COMPENSATION**

3 **Q: What is OPC’s position regarding incentive compensation?**

4 A: OPC witness Schaben concurs with Staff’s incentive compensation calculations but  
5 asserts that “since competently designed incentive compensation plans more than pay for  
6 themselves, the total amount of incentive compensation included in both payroll and cash  
7 working capital should be divided by four and normalized over four years” (page 1). Ms.  
8 Schaben claims that if the full annualized amount of incentive compensation is  
9 recoverable each year until the next rate case an unnecessary windfall will be created for  
10 Evergy “[b]ecause only the cost of compensation payments made for benefits achieved  
11 during the test year are not already recovered by the Company, it makes sense to allow  
12 the Company to recover these costs only as a one-time expenditure and not on a  
13 reoccurring basis” (page 3).

14 **Q: Does the Company agree with Ms. Schaben?**

15 A: No, the Company does not agree with OPC and neither does the Staff. As discussed in  
16 the rebuttal testimony of Staff witness Giacone, the test year used in this rate case reflects  
17 the benefits that result from the 4-year average of incentive compensation payouts that  
18 Staff recommends including in base rates. As Ms. Giacone points out, the Commission  
19 rejected OPC’s arguments in a recent Spire case. OPC’s fundamental position is to not  
20 include any amount of incentive compensation in rates. This is completely unreasonable.  
21 As discussed in the rebuttal testimony of Company witness Kelly Murphy, the  
22 Company’s incentive compensation plan is both appropriate and important to attract and

1 retain the workforce necessary to serve our customers. If OPC's normalization proposal  
2 were adopted, the Company would be denied recovery of a legitimate cost of service.

3 **Q: What does the Company recommend?**

4 A: As I discussed in my direct and rebuttal testimonies, since actual incentive compensation  
5 expense varies year-to-year, a multiyear average, as both the Company and Staff have  
6 done, is the appropriate calculation of incentive compensation expense. The Company  
7 recommends that the Commission adopt Staff's annualization method which uses a  
8 4-year average of incentive compensation payouts. The Company agrees with Staff  
9 and has updated its True-Up calculations to match Staff's recommendation.

### 10 III. STORM RESERVE

11 **Q: What is Staff's position regarding the Company's proposed Storm Reserve?**

12 A: Staff opposes the Company's proposed Storm Reserve arguing that it is not known and  
13 measurable, the Company's proposed \$200,000 threshold is not material, alternative  
14 regulatory mechanisms are available when significant storm costs are incurred, the funds  
15 used to set the reserve should be returned to the Company's customers and storm costs  
16 are included in Staff's normalized level of distribution maintenance expense.

17 **Q: What is the Company's response to Staff?**

18 A: As I discussed in my direct and rebuttal testimonies, the Storm Reserve will be used to  
19 levelize expenditures associated with significant storms benefitting both the customers,  
20 through reduced rate volatility, and the Company by lessening the financial burden of a  
21 storm by smoothing of month-to-month expenditures associated with unpredictable but  
22 likely significant storm events. Commissions, including the Kansas Corporation  
23 Commission, have granted regulatory mechanisms which allow for the establishment of

1 operating reserves for future contingencies that are anticipated to be significant in nature.  
2 A Storm Reserve is a ratemaking tool that allows the Company to maintain the  
3 distribution system to be shared by current and future customers and avoids placing all  
4 the burden on future customers who are using the system at the time the inevitable storm  
5 occurs.

6 **Q: Why is the Company’s proposed \$200,000 minimum threshold appropriate?**

7 A: The implementation of this reserve is intended to cover intermediate to large storms. A  
8 \$200,000 minimum storm level threshold excludes small storms but captures  
9 intermediate to large storms. Ms. Lyon’s implicit suggestion that a threshold should be  
10 “material” as compared to the Company’s total operating expenses is baseless and is  
11 counter to the purpose of the reserve. In addition, the storm reserve is intended to handle  
12 multiple intermediate storms that are in excess of \$200,000, not just one storm that  
13 exceeds the \$200,000 mark. This is an added reason why a higher threshold above  
14 \$200,000 is not needed as severe storms occur at random times and costs can quickly  
15 accumulate as multiple storms can impact the system and cause the need for immediate  
16 repair.

17 **Q: Are alternative regulatory mechanisms available to the Company when significant**  
18 **storm costs are incurred?**

19 A: Yes, an Accounting Authority Order (“AAO”) request is an option if a storm is  
20 significant enough in nature. As discussed in my direct testimony, if a storm becomes so  
21 significant that an AAO request would be needed the utility would still ask for that option  
22 to be available to them. As I discussed in my rebuttal testimony, it is important to note  
23 that any regulatory request to establish an AAO comes at a cost to the utility and its

1 customers due to the regulatory process established to approve such a request.  
2 Establishing a storm reserve could have the potential to reduce potential AAO requests  
3 that might be significant but have the ability to be absorbed by the storm reserve and  
4 eliminate the need for potentially costly regulatory proceedings in the process.

5 **Q: What is the Company's response to Staff's argument that the funds proposed to**  
6 **establish the reserve should instead be returned to customers?**

7 A: As I discussed in my direct and rebuttal testimonies, the Company believes this is the  
8 right time to establish the reserves because no additional funds are needed since there are  
9 already excess deferrals in place available to begin the storm reserves. In addition, the  
10 revenue requirement amount that will be used to prospectively maintain funds in the  
11 storm reserve will be the same impact to cost of service that would already be included in  
12 the revenue requirement through maintenance costs under traditional methods. As such,  
13 no additional amounts are being requested in cost of service from customers beyond what  
14 would already have been included in maintenance expense proposals in this rate case.  
15 Returning the funds to customers in lieu of establishing a Storm Reserve is short-sighted  
16 and would deny customers and the Company the benefit of the reserve and ultimately  
17 result in higher and more volatile expenses.

18 **Q: Does Staff's position of not adopting Company's Storm Reserve have any impact on**  
19 **other Adjustments?**

20 A: Yes, a decision to adopt or not adopt the storm reserve will impact the amount of major  
21 maintenance reserve to be returned to customers for EMW and the amount of  
22 prospectively tracked regulatory liabilities amortization to be returned to customers for  
23 EMM.

1 **Q: What does the Company recommend?**

2 A: The Company recommends that the Commission reject Staff's arguments and adopt the  
3 Company's proposed Storm Reserve to reduce potential volatility in maintenance  
4 expenses prospectively for the benefit of customers and the Company.

5 **IV. SIBLEY**

6 **Q: Did OPC take issue with EMW's proposed ratemaking treatment of Sibley?**

7 A: Yes. I address OPC witness John Robinett's rebuttal testimony regarding Sibley  
8 retirement costs that were expended post retirement of the plan. Company witness John  
9 Spanos addresses OPC's depreciation-related testimony and Darrin Ives addresses OPC's  
10 other issues.

11 **Q: What position did OPC witness John Robinett take concerning Sibley retirement  
12 costs that were expended post retirement of the Sibley Generating Station?**

13 A: OPC witness Robinett proposes to include the Sibley retirement costs of \$37.2 million in  
14 the unrecovered net book value of Sibley that is at issue in this rate case.

15 **Q: Why is this an issue for the Company?**

16 A: OPC proposes to not include the unrecovered net book value balance in rate base in this  
17 rate case filing thus denying a return on the unrecovered balance of Sibley.<sup>1</sup> As  
18 discussed in Company witnesses Ives' and Spanos' rebuttal and surrebuttal testimonies,  
19 the Company is opposed to this position. OPC witness Robinett proposes to increase the  
20 amount of the unrecovered balance by adding to it those prudently incurred expenditures  
21 that occurred after the retirement of the Sibley Generating Station. By doing this, the  
22 Company would be denied a return on its prudently incurred expenditures to retire and

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<sup>1</sup> See Direct Testimony of OPC witness Geoff Marke



1           dismantle Sibley. This is entirely inappropriate. These are legitimate expenditures that  
2           have occurred subsequent to the retirement of the facility and the Company should be  
3           allowed to earn on these capital investments made to render the generating facility safe  
4           and secure. The issues that have been brought up in this case in regards to the timing of  
5           the retirement of Sibley should have no bearing on the ratemaking treatment of these  
6           prudently incurred expenses and should not be compounded by adding the retirement  
7           expenditures that have to occur to appropriately and safely retire a coal generating station  
8           whether it was retired in 2018, 2030 or 2040. Also, as Company witness Spanos points  
9           out the Commission has a long history of adopting Staff positions regarding not including  
10          final retirement costs in depreciation rates while a generating facility is operating. The  
11          Company has requested inclusion of final retirement costs in depreciation rates on  
12          numerous occasions over the years as this is the most appropriate forum to recover these  
13          final retirement costs as it aligns the costs with the customers that are benefiting from the  
14          use of the asset while it is operating. However, the Company has consistently not been  
15          afforded such opportunity. To deny the earlier opportunity to recover the final retirement  
16          costs and then to double down with the OPC proposal in this case that would preclude a  
17          return on the final retirement investments would be egregious ratemaking treatment and  
18          would forego adequate recovery for necessary costs incurred to safely and appropriately  
19          retire generating units.

20   **Q:    What does the Company recommend in regards to these retirement costs?**

21    A:    As stated in my direct testimony, since the retirement costs associated with the Sibley  
22          Generating Station have not previously been recovered in depreciation expense in prior  
23          periods, the costs as previously discussed have been recorded to the accumulated reserve

1 as a debit, decreasing the total accumulated reserve account thus increasing net plant.  
2 This treatment is the appropriate Federal Energy Regulatory Commission (“FERC”)  
3 accounting treatment for retirement costs when incurred. Had there been adequate final  
4 retirement treatment provided for through depreciation rates when the plant was  
5 operating there would not be as significant of an increase in rate base when recording the  
6 actual final retirement costs. However, since there was no final retirement provision in  
7 the depreciation rates during operation, this increase in net plant has been included in rate  
8 base at the true-up in this rate case and ultimately should be recovered like all other  
9 capital expenditures which includes both a return on amount and a return of amount  
10 included in depreciation expense. This is the proper regulatory accounting treatment of  
11 decommissioning capital expenditures that have been recorded associated with the Sibley  
12 Generating Station. The Company requests the Commission approve this recovery in this  
13 rate case and reject OPC witness Robinett’s proposal.

14 **Q: Does the Staff take issue with EMW’s proposed ratemaking treatment of Sibley?**

15 A: Yes. I address Staff witness Majors testimony regarding deferred O&M. Company  
16 witnesses Ives and Spanos address Mr. Major’s other testimony

17 **Q: Please summarize Mr. Majors’ rebuttal testimony regarding Sibley’s deferred**  
18 **O&M.**

19 A: Mr. Majors testifies that he has no concerns with the amounts of O&M deferred pursuant  
20 to the Report and Order in the Sibley AAO case. He states that the Missouri jurisdictional  
21 balance of this deferral will be \$41.7 million through November 2022.

1 **Q: Is the Missouri jurisdictional balance of deferred O&M for Sibley \$41.7 million**  
2 **through November 2022?**

3 A: No. Mr. Majors has not taken into consideration actual fuel expense offsets that EMW  
4 has proposed to reduce the level of deferred O&M expense. Inclusive of these offsets,  
5 the expected value of the deferred Sibley O&M expenses through November 2022 is  
6 \$39,020,260. In File No. EO-2020-0262, a Partial Stipulation and Agreement was  
7 approved by the Commission which directed retirement costs to be included in the Sibley  
8 AAO regulatory liability. The Company did just that and recorded retirement costs that  
9 were fuel related such as fuel handling, physical inventory adjustment and net coal  
10 inventory sales to the AAO as the Company had requested recovery of these dollars  
11 through the fuel adjustment clause. These costs were appropriate costs incurred in order  
12 to close the facility in a safe and secure way and should be eligible for recovery through  
13 an offset to the O&M portion of the Sibley regulatory liability which is a reasonable and  
14 appropriate resolution of these necessary retirement costs consistent with the approved  
15 stipulation and agreement.

16 **V. OTHER COST OF CAPITAL ISSUES – ALLOWANCE FOR FUNDS USED**  
17 **DURING CONSTRUCTION**

18 **Q: Did OPC witness David Murray briefly bring up an issue in his rebuttal testimony**  
19 **regarding Allowance For Funds Used During Construction (“AFUDC”)?**

20 A: Yes. OPC witness Murray asserts that EMM retains earnings rather than support the  
21 dividend paid to Evergy’s shareholders and as a result has “only had a miniscule  
22 percentage of short-term debt” contributing to its AFUDC capitalization rate which  
23 inflates EMM’s rate base (page 29). Mr. Murray recommends the Commission reduce  
24 EMM’s rate base by \$43 million and order EMM and EMW to use short term debt rate to



1 incorporated changes and new functionality into the CIS systems to provide for enhanced  
2 customer system functionality across multiple systems and subsystems.

3 **Q: Have other Company witnesses provided testimony on One CIS / CFP?**

4 A: Yes. Company witness Forrest Archibald provides additional background and  
5 explanation of the One CIS / CFP projects.

6 **Q: How is One CIS / CFP currently accounted for and allocated by the Company?**

7 A: First, let me state that the One CIS / CFP Software is owned and recorded on Evergy  
8 Metro's books similar to many other common assets that are shared across the Evergy  
9 footprint. As described in my direct testimony, the Company employs a common use  
10 billing process in order to appropriately charge all utility jurisdictions for their use of  
11 common assets. The "return on" component of the net plant value for the One CIS/CFP  
12 Software and its annualized depreciation is common use billed to the other regulated  
13 utilities EMW and Evergy Kansas Central ("EKC") based on the number of customers as  
14 a credit to cost of service account 903050 on Evergy Metro's books.

15 **Q: Is One CIS/CFP Software further allocated to EMM?**

16 A: Yes, in the Revenue Requirements calculation it is. Plant, Reserve and Depreciation  
17 Expense for One CIS / CFP Software is allocated within EMM's revenue requirements  
18 model based on the total number of Missouri retail customers of EMM to the Total  
19 Evergy Metro retail customers. This amount offset by the common use billings to other  
20 Evergy utilities provides EMM's share of One CIS/CFP.

21 **Q: What does OPC recommend for the Allocation of One CIS / CFP Software?**

22 A: OPC witness Robinett does not appear to understand how the One CIS/CFP is accounted  
23 for on the books and records of Evergy's jurisdictions. As such, OPC recommends

1 reallocating plant balances of the One CIS / CFP Software to all utility entities of Evergy  
2 based on the customer counts from the July 2022 annual IRP update stakeholder  
3 presentation. Note, the customer numbers provided for the July 2022 IRP update was  
4 based on customers at December 2021.

5 **Q: Does the Company agree with OPC witness Robinett that the One CIS / CFP project**  
6 **should be allocated to all utility entities of Evergy based on customer counts?**

7 A: Yes. The Company does agree and in fact that is exactly what the Company has done  
8 and has included in this rate case through its common use billing process.

9 **Q: Is there a difference between OPC and the Company on the allocations of One CIS /**  
10 **CFP Software?**

11 A: The Company, Staff and OPC all suggest using customers as the driver of the allocations.  
12 The only difference is in the timing of when the allocators are derived for common use  
13 billings. OPC updated to December 2021 which would allocate 20.57% to EMW and  
14 44.59% to EKC vs the Company using December 2020 that follows how common use  
15 billings are recorded on the books for the May 2022 entries which is the end of the test  
16 year inclusive of the true-up period which allocates 21.24% to EMW and 44.07% to  
17 EKC. The May 2022 entry is used for annualizing the common use billing rate case  
18 adjustment. As such, the Company has followed the allocation percentages that were in  
19 place at the time of true-up in this case.

20 **Q: Does that conclude your surrebuttal testimony?**

21 A: Yes, it does.

**TRUE-UP DIRECT TESTIMONY**

**OF**

**RONALD A. KLOTE**

**Case Nos. ER-2022-0129 and ER-2022-0130**

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

2 A: My name is Ronald A. Klote. My business address is 1200 Main, Kansas City, Missouri  
3 64105.

4 **Q: Are you the same Ronald A. Klote who filed Direct and Rebuttal testimony in these**  
5 **dockets?**

6 A: Yes.

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

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

11 **Q: What is the purpose of your true-up direct testimony?**

12 A: The purpose of my testimony is to provide the true-up adjustment summary schedules  
13 and the resulting revenue requirement level after incorporating the actual changes in cost  
14 of service through the true-up period in this rate case proceeding. The True-Up date  
15 adopted by the Missouri Public Service Commission (“Commission”) for this proceeding  
16 is May 31, 2022 as provided in the *Order Setting Procedural Schedule, Denying*  
17 *Consolidation, and Granting a Variance* issued March 16, 2022.

1 **TRUE-UP REVENUE REQUIREMENT**

2 **Q: Please describe EMM’s revenue requirement calculation based on the True-Up**  
3 **through May 31, 2022.**

4 A: The revenue requirement as calculated in the true-up is an increase of \$40.6 million  
5 before rebasing of fuel for the fuel adjustment clause (“FAC”). With the rebasing of fuel  
6 for the FAC the revenue requirement is an increase of \$52.1 million. The initial request  
7 as filed by the Company on January 7, 2022 before the rebasing of fuel for the FAC was  
8 an increase of \$43.9 million. The initial request with the rebasing of fuel was an increase  
9 of \$47.6 million. The true-up revenue requirement amount is set out in Schedule RAK-8.  
10 This schedule, referred to as the Revenue Requirement Model, trues up estimates  
11 included in the Company’s direct filing and includes some positions in which the  
12 Company is in agreement with MPSC Staff. The Revenue Requirement Model and  
13 associated true-up adjustments reflect the Company’s overall true-up case as of May 31,  
14 2022. The components used in calculating the revenue requirement which include the  
15 rate base, the income statement components, summary of adjustments, cash working  
16 capital and jurisdictional allocators are included as Schedules RAK-9 through RAK-13.

17 **Q: Please describe EMW’s revenue requirement calculation based on the True-Up**  
18 **through May 31, 2022.**

19 A: The revenue requirement as calculated in the true-up is an increase of \$18.9 million  
20 before rebasing of fuel for the FAC. With the rebasing of fuel for the FAC the revenue  
21 requirement is an increase of \$54.5 million. The initial request as filed by the Company  
22 on January 7, 2022 before the rebasing of fuel for the FAC was an increase of \$27.7  
23 million. The initial request with the rebasing of fuel was an increase of \$59.8 million.



1 The true-up revenue requirement amount is set out in Schedule RAK-14. This schedule,  
2 referred to as the Revenue Requirement Model, trues up estimates included in the  
3 Company's direct filing and includes some positions in which the Company is in  
4 agreement with MPSC Staff. The Revenue Requirement Model and associated true-up  
5 adjustments reflect the Company's overall true-up case as of May 31, 2022. The  
6 components used in calculating the revenue requirement which include the rate base, the  
7 income statement components, summary of adjustments, cash working capital and  
8 jurisdictional allocators are included as Schedules RAK-15 through RAK-19.

9 **Q: Please describe the process used to true-up the rate base for both EMM and EMW.**

10 A: Rate base items, including plant-related additions, additional accumulated reserve,  
11 associated accumulated deferred income taxes and non-plant items, were trued up to  
12 actuals as of May 31, 2022 on a Missouri jurisdictional basis. Included as part of the  
13 true-up at May 31, 2022 were capital additions across all functional categories which  
14 included intangible, production, transmission, distribution and general plant and were  
15 completed and placed in-service by the May 31, 2022 true-up date for both EMM and  
16 EMW.

17 **Q: Please describe the process used to true-up the capital structure/cost of capital for**  
18 **both EMM and EMW.**

19 A: The capital structure/cost of capital was updated through May 31, 2022, which included  
20 the utilization of EMM's and EMW's actual capital structure and cost of debt. There was  
21 a new debt issuance of \$250M in March 2022 and an equity contribution of \$200M in  
22 February 2022 for EMW. There was no new debt issuances or equity contributions for  
23 EMM during the true-up period.

1 **Q: Please briefly describe the process used to true-up revenue and expenses.**

2 A: The following were the more significant revenue and expense true-up adjustments:

3 Retail Revenues

4 The true-up adjustment for Retail Revenues reflects customer growth and  
5 accounts for the customers switching rate classes where applicable through May 31,  
6 2022. In addition, as discussed in Company witness Albert Bass's surrebuttal testimony  
7 the Company adjusted the weather normalization period to January through December  
8 2021 which aligned with MPSC Staff's direct case.

9 Misc. Test Year Adjustments

10 The true-up adjustment for EMW miscellaneous test year adjustments includes  
11 the correction of an error in the Company's direct filing. The Company intended to  
12 remove all Equity Compensation recorded during the test year. However, the direct filing  
13 inadvertently excluded a test year amount for Equity Compensation recorded to account  
14 930201. This correction was made in the True-Up adjustment CS-11. Staff's direct  
15 filing adjustment agrees with this correction.

16 Fuel and Purchased Power

17 The true-up adjustment for Fuel and Purchased Power is discussed in the true-up  
18 direct testimony of Company witnesses Jessica Tucker.

19 FAC True-up Base Calculation

20 The FAC true-up base calculation as well as revised tariff sheets are discussed in  
21 the true-up direct testimony of Company witness Linda Nunn.

1           IT Software Maintenance

2           The true-up adjustment for IT Maintenance includes actual 12-months ending  
3           May 31, 2022 costs. The increase from our direct filing to our true-up filing is the result  
4           of an Oracle Perpetual Unlimited License Agreement (“PULA”) contract. It was  
5           included in the direct filing at test year levels because it was not recorded to  
6           account/resource combinations that were picked up in adjustment CS-39. However, it  
7           was reclassified to the correct account/resource combination before the true-up period  
8           and thus the increase in that contract was captured in the CS-39 true-up adjustment.

9           Payroll and Payroll-related Benefits

10          The true-up adjustment for Payroll and Payroll-related Benefits reflects the May  
11          31, 2022 employee count and pay levels, updated joint partner billings and business unit  
12          allocations for the 12-months ended May 31, 2022. It also reflects an updated 3-year  
13          average for the Capitalization Ratio (year-end 2020, Test Year ending June 2021, and  
14          True-Up period ending May 2022).

15          Pension and Other Post-Employment Benefits

16          The true-up adjustment for Pension and Other Post-Employment Benefits reflects  
17          updated 2022 actuarial information. The pension calculations include the transition to  
18          Evergy GAAP accounting methodology as described in my direct testimony. The 2022  
19          annualized level of pension expense included in the true-up was slightly lower than  
20          projections included in the Company’s direct filing.

21          Other Benefits

22          The true-up adjustment for Other Benefits which include medical and dental  
23          benefits reflects the annualized cost calculated from the actual costs for these benefits

1 incurred for the 12-month period ending December 31, 2022. This period was chosen  
2 because it more accurately reflects an ongoing level of benefit costs. The 12 months  
3 ending December 2021 was the last full calendar year before the true period of May 31,  
4 2022 and using a full calendar year helps to account for timing and fluctuations in  
5 medical claims and various other benefit costs over the course of a given year.

#### 6 Transmission Revenue

7 The true-up adjustment for transmission revenue reflects actual transmission  
8 revenues booked to FERC Account 456.1 for the 12-month period ending May 31, 2022.

#### 9 Transmission Expense

10 The true-up adjustment for transmission expense reflects an annualization based  
11 on actual costs booked during the 5-month period January through May, 2022 which was  
12 annualized. By using the most current five-month period January through May 2022, the  
13 adjustment includes the impact of the most current months of transmission expense  
14 available based on the transmission rates effective January 2022.

#### 15 Accounts Receivable Bank Fees

16 The true-up adjustment for Accounts Receivable Bank Fees reflects an  
17 annualization based on the most recent monthly fees for May 31, 2022, multiplied by  
18 twelve. The difference from direct is a thirteen-month average as of June, 2021 was used  
19 for calculation of the direct adjustment. Since the Company recognizes the upward trend  
20 of these fees as of May 2022 and the upward trend is expected to continue throughout  
21 2022 as the commercial paper interest rate continues to drastically rise, the Company  
22 used the method of annualization of most recent monthly fees for calculation of the true-  
23 up adjustment. This method is consistent with Staff's method in the 2018 rate case filing.



1           Lease Expense

2           The Company added a Lease expense adjustment in its True-up revenue  
3 requirement calculation and agrees with Staff’s Lease adjustment to remove lease  
4 expense included in the Test Period for the Central Machine Facility, 100-ton crane and  
5 the Wolf Creek to LaCygne 345 KV Transmission totaling \$2,009,540. The Company  
6 has also added a new lease for Underground Space that began April 1, 2022 for \$80,000  
7 annually.

8           Prospective Tracking Amortization

9           The true-up adjustment for Prospective Tracking Amortization reflects the  
10 balance of the prospectively tracked regulatory assets and liabilities through November  
11 2022. What is driving the difference from direct is the Missouri Metro balance in the  
12 true-up adjustment excluded the Renewable Energy Standard deferred costs amortization,  
13 which is consistent with the approach in Staff’s direct testimony. The Company proposes  
14 to utilize a portion of the combined prospectively tracked regulatory liabilities to fund the  
15 establishment of the Storm Reserve for EMM.

16           Common Use Billings

17           The true-up adjustment for Common Use Billings reflects an annualization based  
18 on the May 2022 common use billing. These entries allocate common plant such as  
19 facilities and hardware / software between EMM, EMW and EKC based on the  
20 appropriate allocation factors.

21           Property Tax Expense

22           The true-up adjustment for Property Tax Expense is discussed in the true-up  
23 direct testimony of Company witness Melissa Hardesty.

1           Depreciation and Amortization

2           The true-up adjustment for Depreciation reflects May 31, 2022 plant balances and  
3           the depreciation rates as proposed by Company witness John Spanos. The Company  
4           annualized amortization expense applicable to certain plant including computer software,  
5           land rights and leasehold improvements, by multiplying May 2022 amortization expense  
6           on a total company Missouri basis by twelve.

7           Winter Storm URI Deferral and Amortization

8           The Company included the Winter Storm URI allocation adjustment for EMM as  
9           described in my rebuttal testimony to amortize the Missouri jurisdictional allocation  
10          excess of \$5,381,221 over 4 years or \$1,345,305 annually.

11          Income Taxes

12          The true-up adjustment for Income Tax Expense is discussed in the true-up direct  
13          testimony of Company witness Melissa Hardesty.

14          Jurisdictional Allocators

15          Jurisdictional allocators as provided in Schedule RAK-13 for EMM were updated  
16          for model driven allocators such as PTD which are based on the Schedule 3 plant  
17          balances as of the True-up date May 2022 as well as Distribution Situs Accounts which  
18          are based on Situs as of the True-up date May 2022. These allocators are updated to  
19          match up the Allocator to the date to which the allocator is derived. The overall  
20          Distribution Situs allocator does impact the Salaries and Wages allocator marginally.

21          Income Eligible Weatherization

22          Per the proposal in Company witness Kimberly Winslow's direct testimony, the  
23          income eligible rate base and cost of service adjustments were amended to include the

1 proposed tariff change that would allow the Company to annually roll the remaining  
2 liability, up to \$1M, to the Company's Dollar-Aide Program.

3 Prepayments

4 As past practice, the accounting department were only recording allocations  
5 between Metro and West on a quarterly basis. Therefore, the balances throughout the  
6 true-up period were misstated. The Company's adjustment takes into consideration the  
7 allocations on a monthly basis to more accurately reflect the prepaid amounts on the  
8 correct set of books.

9 **Q: Does that conclude your true-up direct testimony?**

10 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 RONALD A. KLOTE**


**STATE OF MISSOURI** )  
 ) ss  
**COUNTY OF JACKSON** )

Ronald A. Klote, being first duly sworn on his oath, states:

1. My name is Ronald A. Klote. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Senior Director – Regulatory Affairs.
2. Attached hereto and made a part hereof for all purposes is my Surrebuttal & True-Up Direct Testimony on behalf of Evergy Missouri Metro and Evergy Missouri West consisting of twenty-two (22) 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.

  
\_\_\_\_\_  
Ronald A. Klote

Subscribed and sworn before me this 16<sup>th</sup> day of August 2022.

  
\_\_\_\_\_  
Notary Public

My commission expires: 4/26/2025



**Evergy**  
**2022 RATE CASE - MO METRO - True-Up**  
**TY 6/30/21; Update 12/31/21; True-Up 5/31/22**

**Revenue Requirement**

<b>Line No.</b>	<b>Description</b>	<b>7.063% Return</b>
	<b>A</b>	<b>B</b>
1	Net Orig Cost of Rate Base (Sch 2)	\$ 3,196,315,474
2	Rate of Return	<u>7.0631%</u>
3	Net Operating Income Requirement	\$ 225,758,958
4	Net Income Available (Sch 9)	<u>186,101,656</u>
5	Additional NOIBT Needed	39,657,302
6	Additional Current Tax Required	12,416,305
7	Gross Revenue Requirement	<u><u>\$ 52,073,607</u></u>

**Evergy**  
**2022 RATE CASE - MO METRO - True-Up**  
**TY 6/30/21; Update 12/31/21; True-Up 5/31/22**

**Rate Base**

Line No.	Description	Amount	Witness	Adj No.
	A	B	C	D
1	Total Plant :			
2	Total Plant in Service - Schedule 3	6,396,113,682	Klote	RB-20
3	Subtract from Total Plant:			
4	Depreciation Reserve - Schedule 6	2,528,329,024	Klote	RB-30
5	Net (Plant in Service)	<u>3,867,784,657</u>		
6	Add to Net Plant:			
7	Cash Working Capital - Schedule 8	(65,703,810)	Klote	Model
8	Materials and Supplies - Schedule 12	80,299,926	Nunn	RB-72
9	Prepayments - Schedule 12	9,897,350	Nunn	RB-50
10	Fuel Inventory - Oil - Schedule 12	7,165,936	Tucker	RB-74
11	Fuel Inventory - Coal - Schedule 12	30,994,608	Tucker	RB-74
12	Fuel Inventory - Additives - Schedule 12	633,128	Tucker	RB-74
13	Fuel Inventory - Nuclear - Schedule 12	30,296,624	Nunn	RB-75
14	Pre-MEEIA DSM Programs	(15,998,682)	Nunn	RB-100
15	Regulatory Asset - Iatan 1 and Com-MO	(214,979)	Nunn	RB-25
16	Regulatory Asset - Iatan 2	12,239,856	Nunn	RB-26
17	Regulatory Asset - PAYS	51,103	Klote	RB-86
18	Regulatory Asset - PISA Deferral	55,218,871	Klote	RB-85
19	Regulatory Asset - Pensions	(3,305,085)	Klote	RB-65
20	Regulatory Asset - Prepaid Pension Exp	0	Klote	RB-65
21	Regulatory Asset (Liab) - OPEBs Tracker	(3,252,483)	Klote	RB-61
22	Subtract from Net Plant:			
23	Cust Advances for Construction-MO	3,979,568	Nunn	RB-71
24	Customer Deposits-MO	1,835,418	Nunn	RB-70
25	Deferred Income Taxes - Schedule 13	781,148,823	Hardesty	RB-125
26	Def Gain on SO2 Emissions Allowances-MO	22,800,968	Nunn	RB-55
27	Def Gain (Loss) Emissions Allow-Allocated	26,768	Nunn	RB-55
28	Income Eligible Weatherization	0	Nunn	RB-101
29	Total Rate Base	<u><u>3,196,315,474</u></u>		

**Evergy**  
**2022 RATE CASE - MO METRO - True-Up**  
**TY 6/30/21; Update 12/31/21; True-Up 5/31/22**

**Income Statement**

Line No.	Description	Total Company	Adjustment	Adjusted Total Company	Adjusted Jurisdictional
	A	B	C	D	F
1	Operating Revenue	1,857,937,507	130,438,764	1,988,376,271	1,083,991,769
2	Operating & Maintenance Expenses:				
3	Production	671,756,217	161,213,801	832,970,018	459,917,547
4	Transmission	67,272,717	(2,700,796)	64,571,921	36,271,789
5	Distribution	43,155,992	4,367,089	47,523,081	27,463,011
6	Customer Accounting	20,179,312	(17,363,957)	2,815,355	5,551,344
7	Customer Services	33,533,242	(27,616,048)	5,917,194	3,774,610
8	Sales	571,940	(28,657)	543,283	284,948
9	A & G Expenses	114,542,553	(19,828,756)	94,713,797	49,200,873
10	Total O & M Expenses	951,011,972	98,042,677	1,049,054,649	582,464,121
11	Depreciation Expense	276,549,076	70,173,227	346,722,303	179,533,064
12	Amortization Expense	62,520,863	19,058,718	81,579,581	45,033,420
13	Amortization Regulatory Debits & Credits	(84,898,894)	20,583,971	(64,314,923)	5,367,190
14	Taxes other than Income Tax	124,849,400	6,387,196	131,236,596	72,714,283
15	Net Operating Income before Tax	527,905,090	(83,807,024)	444,098,066	198,879,692
16	Income Taxes Current	64,614,763	21,262,067	85,876,830	35,409,367
17	Income Taxes Deferred	1,962,421	(45,577,488)	(43,615,067)	(21,522,875)
18	Investment Tax Credit	(1,168,486)	(899,418)	(2,067,904)	(1,108,457)
19	Total Taxes	65,408,698	(25,214,839)	40,193,859	12,778,036
20	Total Net Operating Income	462,496,392	(58,592,185)	403,904,207	186,101,656

**Evergy**  
**2022 RATE CASE - MO METRO - True-Up**  
**TY 6/30/21; Update 12/31/21; True-Up 5/31/22**

**Summary of Adjustments**

Line No.	Adj No.	Description	Witness	Increase (Decrease)			
				D	E	F	G
				Adjust to 05-31-22 - True Up Date			
				Total Adjustments	Allocated Adjs	100% MO Adjs	100% KS & Whsl Adjs (2)
				Incr (Decr)	Incr (Decr)	Incr (Decr)	Incr (Decr)
<b>JURISDICTIONAL COST OF SERVICE</b>							
1		<b>OPERATING REVENUE</b>					
2		<b>Retail Sales - Schedule 9, line 42</b>					
3	R-20	Normalize MO retail revenues (MO only)	Bass / Miller	(25,304,388)		(25,304,388)	
4	R-21a	Adjust MO forfeited disc for R-21a LPC (MO only)	Nunn	2,692,694		2,692,694	
5	R-21b	Adjust MO forfeited disc for R-21b LPC - ASK (MO only)	Nunn	159,466		159,466	
6	CS-23	Remove FAC Under Recovery	Nunn	74,925,490	34,548,328		40,377,162
7	R-35	Normalize Bulk Power Sales	Tucker	76,275,119	76,275,119		
8	R-40	PAYS Revenue Offset	Klote	14,135		14,135	
9	R-78	Amortize bulk power margins in excess of 25th percentile (MO only)	Nunn	(802,053)		(802,053)	
10	R-80	Transmission Revenues - ROE	Fluke	(577,577)	(577,577)		
11	R-82	Transmission Revenues - Annualized	Klote	3,055,878	3,055,878		
12		<b>Operating Revenue - Schedule 9, line 42</b>		<b>130,438,764</b>	<b>113,301,748</b>	<b>(23,240,146)</b>	<b>40,377,162</b>
13							
14		<b>OPERATING EXPENSES - Schedule 9, line 334</b>					
15	CS-4	Reflect KCREC test year bad debt expense in METRO's COS	Nunn	4,391,382		3,056,422	1,334,960
16	CS-9	Reflect KCREC test year bank commitment fees in METRO's COS	Nunn	1,326,417	1,326,417		
17	CS-10	Reflect test year interest on customer deposits in COS	Nunn	161,069		151,196	9,873
18	CS-11	Reverse prior period and non-recurring test year amounts.	Nunn	(6,027,793)	(6,027,793)		
19	CS-20a	Normalize bad debt expense related to test year revenue	Nunn	6,362,816		6,362,816	
20	CS-20b	Normalize bad debt expense related to jurisdictional "Ask"	Nunn	558,968		558,968	
21	CS-22	Amortize deferred gain on sale of SO2 emissions allowances	Nunn	0	0	0	

**Evergy**  
**2022 RATE CASE - MO METRO - True-Up**  
**TY 6/30/21; Update 12/31/21; True-Up 5/31/22**

**Summary of Adjustments**

Line No.	Adj No.	Description	Witness	Increase (Decrease)			
				D	E	F	G
				Adjust to 05-31-22 - True Up Date			
<b>JURISDICTIONAL COST OF SERVICE</b>				<b>Total Adjustments</b>	<b>Allocated Adjs</b>	<b>100% MO Adjs</b>	<b>100% KS &amp; Whsl Adjs (2)</b>
				<b>Incr (Decr)</b>	<b>Incr (Decr)</b>	<b>Incr (Decr)</b>	<b>Incr (Decr)</b>
22	CS-23	Remove FAC Under Recovery	Nunn	(8,777,230)		(2,364,430)	(6,412,800)
23	CS-24	Normalize fuel and purchase power energy (on system)	Tucker	177,540,522	177,540,936	(414)	
24	CS-25	Normalize purchased power capacity costs	Tucker	0	0		
25	CS-27	Wolf Creek Water Contract	Klote	(101,366)	(101,366)		
26	CS-35	Defer & Amortize Wolf Creek Mid-Cycle Outage	Klote	(492,864)	(492,864)		
27	CS-36	Annualize Wolf Creek refueling outage amortization	Klote	(58,878)	(58,878)		
28	CS-37	Adjust Nuclear decommissioning expense	Klote	0			
29	CS-39	IT Software Maintenance	Klote	1,953,037	1,953,037		
30	CS-40	Normalize Transmission maintenance expense	Nunn	304,559	304,559		
31	CS-41	Normalize Distribution maintenance expense	Nunn	4,164,466	4,164,466		
32	CS-42	Normalize Generation maintenance expense	Nunn	1,659,648	1,659,648		
33	CS-43	Nuclear Maintenance	Nunn	50,351	50,351		
34	CS-44	Adjust cost of Economic Relief Pilot Program (ERPP) (MO only)	Nunn	113,793		113,793	
35	CS-45	Normalize transmission of electricity by others	Klote	3,088,853	3,088,853		
36	CS-50	Annualize salary and wage expense for changes in staffing levels and base pay rates	Klote	(11,153,540)	(11,153,540)		
37	CS-51	Normalize incentive compensation costs- Value Link	Klote	(4,223,876)	(4,223,876)		
38	CS-60	Annualize other benefit costs	Klote	(2,044,037)	(2,044,037)		
39	CS-61	Annualize OPEB expense	Klote	(981,996)	(981,996)		
40	CS-62	Normalize SERP expense	Klote	(1,406,605)	(1,406,605)		
41	CS-65	Annualize FAS 87 and FAS 88 pension expense	Klote	(10,241,182)	(10,241,182)		
42	CS-70	Annualize Insurance Premiums	Nunn	242,396	242,396		
43	CS-71	Normalize injuries and damages expense	Nunn	1,594,733	1,594,733		
44	CS-73	Remove Test Year Storm Costs	Klote	0		0	
45	CS-76	Annualize interest on customer deposits	Nunn	(81,828)		(73,191)	(8,637)
46	CS-77	Annualize Customer Accounts expense for credit card payment costs	Nunn	0	0		

**Evergy**  
**2022 RATE CASE - MO METRO - True-Up**  
**TY 6/30/21; Update 12/31/21; True-Up 5/31/22**

**Summary of Adjustments**

Line No.	Adj No.	Description	Witness	Increase (Decrease)			
				D	E	F	G
				Adjust to 05-31-22 - True Up Date			
<b>JURISDICTIONAL COST OF SERVICE</b>				<b>Total Adjustments</b>	<b>Allocated Adjs</b>	<b>100% MO Adjs</b>	<b>100% KS &amp; Whsl Adjs (2)</b>
				<b>Incr (Decr)</b>	<b>Incr (Decr)</b>	<b>Incr (Decr)</b>	<b>Incr (Decr)</b>
47	CS-78	Annualize KCREC bank fees related to sale of receivables	Nunn	671,664	671,664		
48	CS-80	Amortize MO, KS and FERC rate case expenses	Nunn	394,157		394,157	
49	CS-85	Annualize regulatory assessments	Nunn	(3,015)	(78,468)	(321,275)	396,728
50	CS-86	SPP Schedule 1 Admin Fee's	Nunn	(2,125,388)	(2,125,388)		
51	CS-89	Meter Replacement O&M	Nunn	(924,048)	(924,048)		
52	CS-90	Advertising	Nunn	(9,578)	(9,578)		
53	CS-91	Amortize DSM Advertising	Nunn	(50,986)		(50,986)	
54	CS-92	Dues/Donations	Nunn	(67,142)	(67,142)		
55	CS-95	Amortization of Merger Transition Costs	Nunn	0	0		
56	CS-98	MEEIA	Nunn	(14,692,082)		(14,692,082)	
57	CS-100	Pre-MEEIA DSM Programs	Nunn	(4,643,578)		(4,643,578)	
58	CS-101	Income Eligible Weatherization	Nunn	185,830		185,830	
59	CS-102	Amortiz of EV Over-Recovery	Nunn	157,614		157,614	
60	CS-103	Amortiz of STB	Nunn	101,759		101,759	
61	CS-108	Transource CWIP/FERC Incentives	Fluke	35,418	35,418		
62	CS-109	Lease Expense	Klote	(1,929,540)	(1,929,540)		
63	CS-113	Amortize Prospective Tracking	Nunn	61,555		61,555	
64	CS-114	Amortize LaCygne Obsolete Inventory	Nunn	(95,115)		(95,115)	
65	CS-116	Renewable Energy Standards	Nunn	(8,470,587)		(8,470,587)	
66	CS-117	Common-use Billings	Klote	(26,971,213)	(24,769,799)	(2,201,414)	
67	CS-120	Annualize depr exp based on proposed jurisdictional depr rates applied to jurisdictional plant-in-service at indicated period (unit trains & transportation equipment)	Klote	(1,504,864)	(1,504,864)		
68		<b>Operating Expenses - Schedule 9, line 339</b>		<b>98,042,677</b>	<b>124,491,514</b>	<b>(21,768,961)</b>	<b>(4,679,876)</b>
69							
70		<b>Depreciation Expense - Schedule 9, line 349</b>					
71	CS-11	Reverse prior period and non-recurring test year amounts.	Nunn	(831,285)		(831,285)	

**Evergy**  
**2022 RATE CASE - MO METRO - True-Up**  
**TY 6/30/21; Update 12/31/21; True-Up 5/31/22**

**Summary of Adjustments**

Line No.	Adj No.	Description	Witness	Increase (Decrease)			
				D	E	F	G
<b>JURISDICTIONAL COST OF SERVICE</b>				<b>Adjust to 05-31-22 - True Up Date</b>			
				<b>Total Adjustments</b>	<b>Allocated Adjs</b>	<b>100% MO Adjs</b>	<b>100% KS &amp; Whsl Adjs (2)</b>
				<b>Incr (Decr)</b>	<b>Incr (Decr)</b>	<b>Incr (Decr)</b>	<b>Incr (Decr)</b>
72	CS-120	Annualize depreciation expense based on proposed jurisdictional depreciation rates applied to jurisdictional plant-in-service at indicated period	Klote	71,004,512	71,004,512		
73				70,173,227	71,004,512	(831,285)	0
74	<b>Amortization Expense - Schedule 9, line 360</b>						
75	CS-11	Reverse prior period and non-recurring test year amounts.	Nunn	2,700,634		2,700,634	
76	CS-121	Annualize plant amortization expense based on jurisdictional amortization rates applied to unamortized jurisdictional plant-in-Service at indicated period	Klote	16,358,084	11,973,221	4,384,863	
77	CS-137	Amort EPRI Contract	Klote	0	0		
78				19,058,718	11,973,221	7,085,497	0
79	<b>Regulatory Debits &amp; Credits - Schedule 9, line 378</b>						
80	CS-11	Reverse prior period and non-recurring test year amounts.	Nunn	17,063,746		17,063,746	
81	CS-72	Storm Reserve	Klote	1,233,384		1,233,384	
82	CS-93	Amortization PISA Deferral	Klote	2,760,944		2,760,944	
	CS-113	Amortize Prospective Tracking	Nunn	(3,129,832)		(3,129,832)	
83	CS-131	Amort Electrification Deferred Asset	Nunn	17,988		17,988	
84	CS-133	Amort Customer Education Reg Asset	Nunn	24,697		24,697	
85	CS-134	Amort TOU Program Costs Reg Asset	Nunn	397,074		397,074	
86	CS-135	PAYS Amort	Klote	4,259		4,259	
87	CS-136	COVID AAO Amort	Klote	866,406		866,406	
88	CS-140	Winter Storm URI Deferral & Amortization	Klote	1,345,305		1,345,305	
89				20,583,971	0	20,583,971	0
90	<b>Taxes Other than Income - Schedule, line 388</b>						
91	CS-53	Annualize Payroll tax expense	Klote	(1,984,979)	(1,984,979)		
92	CS-126	Adjust property tax expense	Hardesty	8,381,946	8,381,946		
93	CS-128	KCMO Earnings Tax	Hardesty	(9,771)		(9,771)	



**Evergy**  
**2022 RATE CASE - MO METRO - True-Up**  
**TY 6/30/21; Update 12/31/21; True-Up 5/31/22**

**Summary of Adjustments**

Line No.	Adj No.	Description	Witness	Increase (Decrease)			
				D	E	F	G
<b>JURISDICTIONAL COST OF SERVICE</b>				<b>Adjust to 05-31-22 - True Up Date</b>			
				<b>Total Adjustments</b>	<b>Allocated Adjs</b>	<b>100% MO Adjs</b>	<b>100% KS &amp; Whsl Adjs (2)</b>
				<b>Incr (Decr)</b>	<b>Incr (Decr)</b>	<b>Incr (Decr)</b>	<b>Incr (Decr)</b>
94				6,387,196	6,396,967	(9,771)	0
95		<b>Income Tax Expense- Schedule 9, line 405</b>					
96	CS-125	Reflect adjustments to Schedule 9, Allocation of Current and Deferred Income Taxes	Hardesty	(25,214,839)	(25,569,277)	354,438	
97				(25,214,839)	(25,569,277)	354,438	0
98							
99		<b>Total Electric Oper. Expenses</b>		189,030,949	188,296,936	5,413,889	(4,679,876)
100							
101		<b>Net Electric Operating Income - Schedule 9, line 407</b>		(58,592,185)	(74,995,188)	(28,654,035)	45,057,038
				0			

(1) All amounts are total company; if an adjustment is applicable to only KS or MO, it is so indicated

(2) These adjustments affect Kansas or Wholesale jurisdictions and are not discussed in testimony supporting the Missouri rate case.

**Evergy**  
**2022 RATE CASE - MO METRO - True-Up**  
**TY 6/30/21; Update 12/31/21; True-Up 5/31/22**

**Cash Working Capital**

Line No.	Account Description	Jurisdictional		Net			CWC Req (B) X (F)
		Test Year Expenses	Revenue Lag	Expense Lead	(Lead)/Lag (C) - (D)	Factor (Col E/366)	
	A	B	C	D	E	F	G
1	<b>Operations &amp; Maintenance Expense</b>						
2	Gross Payroll with Taxes excl Accrued Vac	67,177,955	26.98	13.21	13.77	0.0377	2,534,357
3	Accrued Vacation	3,868,945	26.98	365.00	-338.02	-0.9261	(3,582,961)
4	Purchased Coal & Freight	95,128,188	26.98	12.42	14.56	0.0399	3,794,703
5	Purchased Gas	3,093,519	26.98	38.00	-11.02	-0.0302	(93,399)
6	Purchased Oil	7,339,239	26.98	12.13	14.85	0.0407	298,596
7	Purchased Power	254,444,064	26.98	37.45	-10.47	-0.0287	(7,298,711)
8	Pension Expense	18,407,154	26.98	42.25	-15.27	-0.0418	(770,075)
9	Employee Benefits	13,245,235	26.98	13.29	13.69	0.0375	496,787
10	Incentive Compensation	5,214,036	26.98	257.50	-230.52	-0.6316	(3,292,985)
11	Cash Vouchers	114,545,785	26.98	35.15	-8.17	-0.0224	(2,563,943)
12	<b>Total Operation &amp; Maintenance Expense</b>	<u>582,464,121</u>					<u>(10,477,629)</u>
13	<b>Taxes other than Income Taxes</b>						
14	City Franchise Taxes - 6%, 4% & Other GRT - MO	67,626,145	9.57	48.89	-39.32	-0.1077	(7,285,096)
15	Ad Valorem / Property Taxes	65,873,255	26.98	227.12	-200.14	-0.5483	(36,120,200)
16	Sales & Use Tax- MO and Fuel, Heavy Vehicle Taxes	29,777,552	9.57	7.94	1.63	0.0045	132,979
17	<b>Total Taxes other than Income Taxes</b>	<u>163,276,952</u>					<u>(43,272,317)</u>
18	<b>Tax Offset From Rate Base</b>						
19	Current Income Taxes-Federal Offset	30,007,665	26.98	38.00	-11.02	-0.0302	(905,985)
20	Current Income Taxes-State Offset	5,401,702	26.98	38.00	-11.02	-0.0302	(163,087)
21	Interest Expense Offset	61,577,018	26.98	91.5	-64.52	-0.1768	(10,884,792)
22	<b>Total Offset From Rate Base</b>	<u>96,986,385</u>					<u>(11,953,864)</u>
23	<b>Total Cash Working Capital Requirement</b>	<u>842,727,457</u>					<u>(65,703,810)</u>

**Evergy**  
**2022 RATE CASE - MO METRO - True-Up**  
**TY 6/30/21; Update 12/31/21; True-Up 5/31/22**

**Allocation Factors**

Line No.	Jurisdiction Factors	Missouri	KS & Wholesale	Total
	A	B	C	D
1	<b>Jurisdiction Factors</b>			
2	Missouri Jurisdictional	100.0000%	0.0000%	100.0000%
3	Kansas Jurisdictional	0.0000%	100.0000%	100.0000%
4	Non Jurisdictional/Wholesale	0.0000%	100.0000%	100.0000%
5	D1 - Demand (Capacity) Factor	51.6676%	48.3324%	100.0000%
6	E1 - Energy Factor with Losses (E1)	56.0932%	43.9068%	100.0000%
7	C1 - Customer - Elec (Retail only) (C1)	52.4492%	47.5508%	100.0000%
8	<b>Blended Factors</b>			
9	Sal & Wg - Salaries & Wages w/o A&G	52.8330%	47.1670%	100.0000%
10	PTD - Prod/Trsm/Dist Plant (excl Gen)	53.6029%	46.3971%	100.0000%
11	Dist Plt - Weighted Situs Basis	57.0845%	42.9155%	100.0000%
12	<b>Situs Basis Plant used for Dist Depr Reserve</b>			
13	360 - Dist Land	44.4625%	55.5375%	100.0000%
14	360 - Dist Land Rights	59.6785%	40.3215%	100.0000%
15	361 - Dist Structures & Improvements	57.5859%	42.4141%	100.0000%
16	362 - Distr Station Equipment	67.3590%	32.6410%	100.0000%
17	362 - Distr Station Equip-Communication	55.6605%	44.3395%	100.0000%
18	363 - Distr Energy Storage Equipment	100.0000%	0.0000%	100.0000%
19	364 - Dist Poles, Towers & Fixtures	55.8515%	44.1485%	100.0000%
20	365 - Dist Overhead Conductor	59.0212%	40.9788%	100.0000%
21	366 - Dist Underground Circuits	58.5461%	41.4539%	100.0000%
22	367 - Dist Underground Conduct & Devices	52.8477%	47.1523%	100.0000%
23	368 - Dist Line Transformers	56.7840%	43.2160%	100.0000%
24	369 - Dist Services	54.1217%	45.8783%	100.0000%
25	370 - Dist Meters	56.7642%	43.2358%	100.0000%
26	370 - Dist AMI Meters	52.8700%	47.1300%	100.0000%
27	371 - Dist Customer Premise Installations	68.7484%	31.2516%	100.0000%
28	371 - Dist Electric Vehicle Charging Stations	55.9332%	44.0668%	100.0000%
29	373 - Dist Street Lights & Traffic Signals	50.6623%	49.3377%	100.0000%

**Evergy**  
**2022 RATE CASE - MO WEST - True-Up**  
**TY 6/30/21; Update 12/31/21; True-Up 5/31/22**

**Revenue Requirement**

<b>Line No.</b>	<b>Description</b>	<b>7.069% Return</b>
	<b>A</b>	<b>B</b>
1	Net Orig Cost of Rate Base (Sch 2)	\$ 2,596,327,360
2	Rate of Return	<u>7.069%</u>
3	Net Operating Income Requirement	\$ 183,536,977
4	Net Income Available (Sch 9)	<u>\$ 141,991,076</u>
5	Additional NOIBT Needed	41,545,901
6	Additional Current Tax Required	<u>\$ 13,007,606</u>
7	Gross Revenue Requirement	<u><u>\$ 54,553,508</u></u>

**Evergy**  
**2022 RATE CASE - MO WEST - True-Up**  
**TY 6/30/21; Update 12/31/21; True-Up 5/31/22**

**Rate Base**

Line No.	Description	Amount	Witness	Adj No.
	A	B	C	D
	<b>Total Plant :</b>			
1	Total Plant in Service - Schedule 3	\$ 4,225,471,604	Klote	RB-20
	<b>Subtract from Total Plant:</b>			
2	Depreciation Reserve Schedule 5	1,048,642,028	Klote	RB-30
3	<b>Net (Plant in Service)</b>	<u>\$ 3,176,829,576</u>		
	<b>Add to Net Plant:</b>			
4	Cash Working Capital	(52,388,414)	Klote	Model
5	Materials and Supplies	43,702,042	Nunn	RB-72
6	Prepayments	4,631,087	Nunn	RB-50
7	Fuel Inventory - Oil	13,056,938	Tucker	RB-74
8	Fuel Inventory - Coal	12,852,171	Tucker	RB-74
9	Fuel Inventory - Other	308,601	Tucker	RB-74
10	Pre-MEEIA DSM Programs	(8,465,234)	Nunn	RB-100
11	Iatan 1 & Common Regulatory Asset	3,730,957	Nunn	RB-25
12	Iatan 2 Regulatory Asset	12,192,932	Nunn	RB-26
13	Regulatory Asset - PAYS	69,255	Klote	RB-86
14	Regulatory Asset - PISA Deferral	44,841,354	Klote	RB-85
15	Reg Asset - FAS 87 Pension Tracker	7,810,474	Klote	RB-65
16	Reg Asset (Liab) - OPEB Tracker	(5,222,583)	Klote	RB-61
	<b>Subtract from Net Plant:</b>			
17	Customer Advances for Construction	\$ 3,940,212	Nunn	RB-71
18	Customer Deposits	2,232,096	Nunn	RB-70
19	Income Eligible Weatherization	506,851	Nunn	RB-101
20	Deferred Income Taxes - Allocated	565,199,863	Hardesty	RB-125
21	Deferred Income Taxes - Electric/Whsl Only	85,742,776	Hardesty	RB-125
22	<b>Total Rate Base</b>	<u><u>\$ 2,596,327,360</u></u>		

**Evergy**  
**2022 RATE CASE - MO WEST - True-Up**  
**TY 6/30/21; Update 12/31/21; True-Up 5/31/22**

**Income Statement**

Line No.	Description	Total Company Test Year	Adjustment	Adjusted Total Company	Electric Juris Adjusted Balance
	A	B	C	D	E
1	Operating Revenue	\$ 828,546,714	(9,276,012)	819,270,702	800,757,917
2	Operating & Maintenance Expenses:				
3	Production	\$ 295,464,380	\$ 11,995,902	\$ 307,460,282	\$ 303,205,538
4	Transmission	48,571,324	(13,036,377)	35,534,947	35,416,841
5	Distribution	28,214,800	1,134,426	29,349,226	28,591,973
6	Customer Accounting	11,859,955	15,940,887	27,800,842	27,800,842
7	Customer Services	28,646,280	(25,310,654)	3,335,626	3,335,626
8	Sales	222,029	686	222,715	222,715
9	A & G Expenses	89,602,001	\$ (20,133,315)	69,468,686	67,441,948
10	Total O & M Expenses	<u>\$ 502,580,769</u>	<u>\$ (29,408,444)</u>	<u>\$ 473,172,325</u>	<u>\$ 466,015,485</u>
11	Depreciation Expense	\$ 110,260,846	\$ 30,089,378	\$ 140,350,224	\$ 138,255,458
12	Amortization Expense	1,473,491	(52,151)	1,421,340	1,419,486
13	Amortization Regulatory Debits & Credits	18,662,403	(24,959,010)	(6,296,607)	(4,375,741)
14	Taxes other than Income Tax	50,480,637	4,333,755	54,814,392	54,080,468
15	Net Operating Income before Tax	<u>\$ 145,088,568</u>	<u>\$ 10,720,459</u>	<u>\$ 155,809,027</u>	<u>\$ 145,362,760</u>
16	Income Taxes	\$ (54,075,569)	\$ 73,056,185	\$ 18,980,616	\$ 18,980,616
17	Income Taxes Deferred	69,934,408	(85,542,978)	(15,608,570)	(15,608,570)
18	Investment Tax Credit	(71,613)	71,251	(362)	(362)
19	Total Taxes	<u>\$ 15,787,226</u>	<u>\$ (12,415,542)</u>	<u>\$ 3,371,684</u>	<u>\$ 3,371,684</u>
20	Total Net Operating Income	<u><u>\$ 129,301,342</u></u>	<u><u>\$ 23,136,001</u></u>	<u><u>\$ 152,437,343</u></u>	<u><u>\$ 141,991,076</u></u>

**Evergy**  
**2022 RATE CASE - MO WEST - True-Up**  
**TY 6/30/21; Update 12/31/21; True-Up 5/31/22**

**Summary of Adjustments**

Line No.	Adj No. A	Description B	Witness C	Total Company Increase (Decrease) D
1	R-20	Revenue Normalization	Bass/Miller	\$ (36,429,691)
2	R-21a	Forfeited Discounts	Nunn	\$ 971,201
3	R-21b	Forfeited Discounts - Revenue Requirement "Ask"	Nunn	\$ 68,179
4	CS-23	Remove FAC Under-Recovery (Revenue)	Nunn	\$ (505,002)
5	R-35	Off-System Sales Revenue	Tucker	\$ 26,779,052
6	R-40	PAYS Revenue Offset	Klote	\$ 15,302
7	R-80	Transmission Revenue Credit	Fluke	\$ (1,046,838)
8	R-82	Transmission Revenue Annualization	Klote	\$ 1,368,568
9	R-99	NUCOR Revenue	Nunn	\$ -
10	R-106	L&P Revenue Phase In Amort	Nunn	\$ (496,784)
11	CS-4	GREC Bad Debt Expense	Nunn	\$ 2,437,083
12	CS-9	GREC Bank Fees	Nunn	\$ 598,434
13	CS-10	Customer Deposits - Interest	Nunn	\$ 206,329
14	CS-11	Out-of-Period Items - Cost of Service	Nunn	\$ (30,517,049)
15	CS-20a	Bad Debt	Nunn	\$ 3,474,758
16	CS-20b	Bad Debt - Revenue Requirement "Ask"	Nunn	\$ 416,825
17	CS-23	Remove FAC Under-Recovery (Expense)	Nunn	\$ 292,680,749
18	CS-24	Fuel & PP Energy (On-system)	Tucker	\$ (272,025,353)
19	CS-25	Purchased Power (Capacity)	Tucker	\$ (514,800)
20	CS-39	IT Software Maintenance	Klote	\$ 744,834
21	CS-40	Transmission Maintenance	Nunn	\$ -
22	CS-41	Distribution Maintenance	Nunn	\$ 54,543
23	CS-42	Generation Maintenance	Nunn	\$ (1,120,504)
24	CS-43	Major Maintenance	Nunn	\$ (7,989,652)
25	CS-44	ERPP	Nunn	\$ (37,175)
26	CS-45	Transmission of Electricity by Others	Klote	\$ (11,841,241)
27	CS-48	Iatan II O&M	Nunn	\$ (537,088)
28	CS-50	Payroll	Klote	\$ 285,521

**Evergy**  
**2022 RATE CASE - MO WEST - True-Up**  
**TY 6/30/21; Update 12/31/21; True-Up 5/31/22**

**Summary of Adjustments**

Line No.	Adj No. A	Description B	Witness C	Total Company Increase (Decrease) D
29	CS-51	Incentive	Klote	\$ (346,475)
30	CS-53	Payroll Taxes	Klote	\$ 124,391
31	CS-60	Other Benefits	Klote	\$ 182,233
32	CS-61	OPEB	Klote	\$ 305,546
33	CS-62	SERP	Klote	\$ (363,893)
34	CS-65	Pension Expense	Klote	\$ (7,997,407)
35	CS-70	Insurance	Nunn	\$ 407,009
36	CS-71	Injuries and Damages	Nunn	\$ 49,374
37	CS-72	Storm Reserve	Klote	\$ 593,144
38	CS-73	Remove Storm Reserve fr TP	Klote	\$ (129,172)
39	CS-76	Customer Deposit - Interest	Nunn	\$ (111,465)
40	CS-77	Credit Card & Electronic Check Fee Expense	Nunn	\$ -
41	CS-78	GREC Bank Fees	Nunn	\$ 350,488
42	CS-80	Rate Case Expense	Nunn	\$ 419,471
43	CS-85	Regulatory Assessment	Nunn	\$ (776,195)
44	CS-86	SPP Schedule 1A Admin Fees	Nunn	\$ (1,768,834)
45	CS-89	Meter Replacement O&M	Nunn	\$ (88,489)
46	CS-90	Advertising	Nunn	\$ (4,193)
47	CS-91	DSM Advertising Costs	Nunn	\$ (19,057)
48	CS-92	Dues & Donations	Nunn	\$ (26,341)
49	CS-93	Amortization PISA Deferral	Klote	\$ 2,242,068
50	CS-95	Amortization of Merger Transition Costs	Nunn	\$ -
51	CS-98	MEEIA	Nunn	\$ (14,690,258)
52	CS-100	DSM/EE	Nunn	\$ (3,436,562)
53	CS-101	Income Eligible Weatherization	Nunn	\$ 185,012



**Evergy**  
**2022 RATE CASE - MO WEST - True-Up**  
**TY 6/30/21; Update 12/31/21; True-Up 5/31/22**

**Summary of Adjustments**

Line No.	Adj No. A	Description B	Witness C	Total Company Increase (Decrease) D
54	CS-105	Amortization of Transource Transferred Asset Value - Reg Liab	Nunn	\$ 1,894,576
55	CS-107	L&P Ice Storm AAO	Nunn	\$ 1,349,365
56	CS-108	Remove CWIP/FERC Incentives-Transource	Fluke	\$ 20,517
57	CS-110	Amortization of Transource Account Review-Reg Liab	Nunn	\$ 69,950
58	CS-111	Amort Iatan I and Common Reg Asset	Nunn	\$ -
59	CS-112	Amort Iatan II Reg Asset	Nunn	\$ -
60	CS-113	Amort Prospective Tracking	Nunn	\$ (467,554)
61	CS-116	Renewable Energy Standards	Nunn	\$ (7,126,362)
62	CS-117	Common Use Billings - Common Plant Adds	Klote	\$ (147,576)
63	CS-120	Depreciation Expense	Klote	\$ 37,422,629
64	CS-121	Plant Amortization Expense	Klote	\$ (106,472)
65	CS-125	Income Taxes	Hardesty	\$ 7,246,258
66	CS-126	Property Taxes	Hardesty	\$ 4,209,364
67	CS-131	Amort Electrification Deferred Asset	Nunn	\$ 9,686
68	CS-132	Amort Exp Portion of Sibley AAO Deferral	Klote	\$ (9,775,147)
69	CS-133	Amort Customer Education Reg Asset	Nunn	\$ 24,983
70	CS-134	Amort TOU Program Costs Reg Asset	Nunn	\$ 477,910
71	CS-135	PAYS Amort	Klote	\$ 5,771
72	CS-136	COVID AAO Amort	Klote	\$ 725,280
73	CS-137	Amort EPRI Contract	Klote	\$ -
74		<b>Total Impact on Net Operating Income</b>		<b><u>\$ 3,474,202</u></b>

**Evergy**  
**2022 RATE CASE - MO WEST - True-Up**  
**TY 6/30/21; Update 12/31/21; True-Up 5/31/22**

**Cash Working Capital**

Line No.	Account Description	(Elec-Juris) Test Year Expenses	Revenue Lag	Expense Lead	Net (Lead)/Lag (C) - (D)	Factor (Col E/365)	CWC Req (B) X (F)
	A	B	C	D	E	F	G
<b>Operations &amp; Maintenance Expense</b>							
1	Gross Payroll with Taxes excl Accrued Vac	44,126,266	26.11	13.21	12.90	0.04	1,559,531
2	Accrued Vacation	1,861,080	26.11	365.00	(338.89)	(0.93)	(1,727,949)
3	Iatan - Coal & Freight	20,059,630	26.11	11.84	14.27	0.04	784,249
4	Purchased Gas & Oil	766,331	26.11	38.87	(12.76)	(0.03)	(26,790)
5	Purchased Power	245,638,165	26.11	36.25	(10.14)	(0.03)	(6,824,030)
6	Pension Expense	10,916,781	26.11	42.25	(16.14)	(0.04)	(482,731)
7	Employee Benefits	(434,647)	26.11	13.29	12.82	0.04	(15,266)
8	Incentive Compensation	3,333,113	26.11	257.50	(231.39)	(0.63)	(2,113,011)
9	Cash Vouchers	139,748,766	26.11	38.30	(12.19)	(0.03)	(4,667,226)
10	<b>Total Operation &amp; Maintenance Expense</b>	<b><u>466,015,485</u></b>					<b><u>(13,513,223)</u></b>
<b>Taxes other than Income Taxes</b>							
11	City Franchise Taxes - 6%, 4% & Other GRT - MO	39,440,283	10.90	55.64	(44.74)	(0.12)	(4,834,406)
12	Ad Valorem / Property Taxes	50,495,596	26.11	205.79	(179.68)	(0.49)	(24,857,668)
13	Sales & Use Tax- MO and Fuel, Heavy Vehicle Taxes	23,979,827	10.90	5.17	5.73	0.02	376,450
14	<b>Total Taxes other than Income Taxes</b>	<b><u>113,915,706</u></b>					<b><u>(29,315,624)</u></b>
<b>Tax Offset From Rate Base</b>							
15	Current Income Taxes-Federal	16,102,958	26.11	38.00	(11.89)	(0.03)	(524,559)
16	Current Income Taxes-State	2,877,658	26.11	38.00	(11.89)	(0.03)	(93,741)
17	Interest Expense	49,909,201	26.11	91.50	(65.39)	(0.18)	(8,941,268)
18	<b>Total Offset from Rate Base</b>	<b><u>68,889,817</u></b>					<b><u>(9,559,568)</u></b>
19	<b>Total Cash Working Capital Requirement</b>	<b><u>648,821,008</u></b>					<b><u>(52,388,414)</u></b>

**Evergy**  
**2022 RATE CASE - MO WEST - True-Up**  
**TY 6/30/21; Update 12/31/21; True-Up 5/31/22**

**Allocation Factors**

**Retail/Wholesale - Electric/Steam Combined**

Alloc	Jurisdiction Factors	Retail	Non-Retail	Total
		A	B	C
1,1	100% Jurisdictional/100% Electric	100.0000%	0.0000%	100.0000%
1,3	100% Jurisdictional/Allocated Plant Base	99.0499%	0.9501%	100.0000%
1,13	100% Jurisdictional/O&M	84.6448%	15.3552%	100.0000%
2,2	Non-Juris/Steam	0.0000%	100.0000%	100.0000%
3,1	Demand/Electric	99.6676%	0.3324%	100.0000%
3,4	Demand/Land	99.6676%	0.3324%	100.0000%
3,5	Demand/Structures	94.1184%	5.8816%	100.0000%
3,6	Demand/Boiler Plant	75.5945%	24.4055%	100.0000%
3,7	Demand/Turbogenerators	98.6140%	1.3860%	100.0000%
3,8	Demand/Access Elec Eqpt & General	91.2708%	8.7292%	100.0000%
3,9	Demand/Misc Steam GEN Eqpt	71.2333%	28.7667%	100.0000%
3,10	Demand/Electric/Steam Plant	82.1007%	17.8993%	100.0000%
3,13	Demand/O&M	84.3634%	15.6366%	100.0000%
4,1	Energy/Electric	99.6594%	0.3406%	100.0000%
5,1	Distribution/Electric	99.8061%	0.1939%	100.0000%
6,1	Payroll/Electric	99.7242%	0.2758%	100.0000%
6,14	Payroll/A&G	96.8156%	3.1844%	100.0000%
7,1	Plant/Electric	99.7361%	0.2639%	100.0000%
7,3	Plant/Alloc Plant	98.7885%	1.2115%	100.0000%
7,14	Plant/A&G	96.8272%	3.1728%	100.0000%
8,1	Transmission/Electric	99.6676%	0.3324%	100.0000%

**Retail/Wholesale Allocation Factors - Combined**

Alloc	Jurisdiction Factors	Retail	Wholesale	Total
		A	B	C
1	Jurisdictional-100%	100.0000%	0.0000%	100.0000%
2	Non-jurisdictional-100%	0.0000%	100.0000%	100.0000%
3	Demand (Capacity) Factor	99.6676%	0.3324%	100.0000%
4	Energy Factor	99.6594%	0.3406%	100.0000%
5	Distribution Factor	99.8061%	0.1939%	100.0000%
6	Payroll Factor	99.7242%	0.2758%	100.0000%
7	Plant Factor	99.7361%	0.2639%	100.0000%
8	Transmission Factor	99.6676%	0.3324%	100.0000%

**Electric/Steam Allocation Factors - Combined**

Alloc	Jurisdiction Factors	Electric	Steam	Total
		A	B	C
<b>Rate Base Allocation Factors (Elec/Steam)</b>				
1	Electric - 100%	100.0000%	0.0000%	100.0000%
2	Steam - 100%	0.0000%	100.0000%	100.0000%
4	Land Factor	100.0000%	0.0000%	100.0000%
5	Structures Factor	94.4323%	5.5677%	100.0000%
6	Boiler Plant Factor	75.8466%	24.1534%	100.0000%
7	Turbogenerators Factor	98.9429%	1.0571%	100.0000%
8	Access Elec Eqpt & General Factor	91.5752%	8.4248%	100.0000%
9	Misc Steam GEN Eqpt Factor	71.4709%	28.5291%	100.0000%
10	Electric/Steam Plant Factor	82.3745%	17.6255%	100.0000%
15	Fuel Oil Demand Factor	85.2398%	14.7602%	100.0000%
<b>Income Statement Allocation Factors (Elec/Steam)</b>				
13	Electric After Steam Alloc (O&M)	84.6448%	15.3552%	100.0000%
14	Electric After Steam Alloc (A&G)	97.0834%	2.9166%	100.0000%
<b>Factors Used to Calculate Other Factors</b>				
3	Allocated Plant Base Factor	99.0499%	0.9501%	100.0000%
11	900 lb Steam Demand Factor	59.3099%	40.6901%	100.0000%
12	Total Coal Burned Factor	2.5661%	97.4339%	100.0000%