Issue:	Cost of Service and Rate Design
Witness:	Maurice Brubaker
Type of Exhibit:	Direct Testimony
Sponsoring Parties:	Missouri Industrial Energy Consumers
Case Nos.:	ER-2022-0129 & ER-2022-0130
Date Testimony Prepared:	June 22, 2022

**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 Implement a General Rate Increase for Electric Service	)	**Case No. ER-2022-0129**
In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Request for Authority to Implement a General Rate Increase for Electric Service	)	**Case No. ER-2022-0130**

Direct Testimony and Schedules of

Maurice Brubaker

On behalf of

Missouri Industrial Energy Consumers

June 22, 2022

BRUBAKER & ASSOCIATES, INC.

Project 11259.1 & 11260.1

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 Implement a General Rate Increase for Electric Service	)	Case No. ER-2022-0129
In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Request for Authority to Implement a General Rate Increase for Electric Service	)	Case No. ER-2022-0130

STATE OF MISSOURI)) SS
COUNTY OF ST. LOUIS)

Affidavit of Maurice Brubaker

Maurice Brubaker, being first duly sworn, on his oath states:

1. My name is Maurice Brubaker. I am a consultant with Brubaker & Associates, Inc., having its principal place of business at 16690 Swingley Ridge Road, Suite 140, Chesterfield, Missouri 63017. We have been retained by the Missouri Industrial Energy Consumers in this proceeding on their behalf.

2. Attached hereto and made a part hereof for all purposes is my direct testimony and schedules which were prepared in written form for introduction into evidence in the Missouri Public Service Commission, Case Nos. ER-2022-0129 & ER-2022-0130.

3. I hereby swear and affirm that the testimony and schedules are true and correct and that they show the matters and things that they purport to show.

Maurice Brubaker

Maurice Brubaker

Subscribed and sworn to before me this 22nd day of June, 2022.

TAMMY S. KLOSSNER
Notary Public - Notary Seal
STATE OF MISSOURI
St. Charles County
My Commission Expires: Mar. 18, 2023
Commission # 15024862

Tammy S Klossner

Notary Public

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 Implement a General Rate Increase for Electric Service	)	**Case No. ER-2022-0129**
In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Request for Authority to Implement a General Rate Increase for Electric Service	)	**Case No. ER-2022-0130**

Table of Contents to the
Direct Testimony of Maurice Brubaker

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 Implement a General Rate Increase for Electric Service	**Case No. ER-2022-0129**
In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Request for Authority to Implement a General Rate Increase for Electric Service	**Case No. ER-2022-0130**

Direct Testimony of Maurice Brubaker

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A Maurice Brubaker. My business address is 16690 Swingley Ridge Road, Suite 140, Chesterfield, MO 63017.

Q WHAT IS YOUR OCCUPATION?

A I am a consultant in the field of public utility regulation and a President at Brubaker & Associates, Inc., energy, economic and regulatory consultants.

Q PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A This information is included in Appendix A to my testimony.

Q ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?

A This testimony is presented on behalf of the Missouri Industrial Energy Consumers ("MIEC"), a non-profit company that represents the interests of industrial customers in Missouri utility matters. These companies purchase substantial amounts of electricity

Evergy Metro ("Metro") formerly referred to as Kansas City Power & Light Company ("KCPL") and Evergy West ("West") formerly referred to as KCP&L-Greater Missouri Operations ("GMO"). The outcome of this proceeding will have an impact on their cost of electricity.

Q WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A The purpose of my testimony is to highlight the importance of basing rates on class cost of service and to support the allocation of production system fixed costs proposed by the Companies. I present these concepts using Metro's class cost of service study, to explain how the study should be used, to recommend an appropriate allocation of any rate increase, and to make rate design recommendations.

The same principles apply equally to West.

Q HOW IS YOUR TESTIMONY ORGANIZED?

A First, I present an overview of cost of service principles and concepts. This includes a description of how electricity is produced and distributed as well as a description of the various functions that are involved; namely, generation, transmission and distribution. This is followed by a discussion of the typical classification of these functionalized costs into demand-related costs, energy-related costs and customer-related costs.

With this as a background, I then explain the various factors that should be considered in determining how to allocate these functionalized and classified costs among customer classes.

Finally, I present the results of the detailed cost of service analysis for Metro. This cost study indicates how individual customer class revenues compare to the costs incurred in providing service to them. This analysis and interpretation is then followed by recommendations with respect to the alignment of class revenues with class costs. I conclude by addressing rate design issues.

Summary

Q PLEASE SUMMARIZE YOUR TESTIMONY AND RECOMMENDATIONS.

A My testimony and recommendations may be summarized as follows:

1. Class cost of service is the starting point and the most important guideline for establishing the level of rates charged to customers.

2. Metro exhibits significant summer peak demands as compared to demands in other months.

3. There are two generally accepted methods for allocating generation and transmission fixed costs that would apply to Metro. These are the coincident peak methodology and the average and excess ("A&E") methodology.

4. Metro has presented an A&E-4 Coincident Peak ("A&E-4CP") class cost of service study.

5. Metro's study is reasonable and I will rely on it.

6. The results of Metro's class cost of service study are presented on Schedule MEB-COS-1 and expanded on Schedule MEB-COS-2, which shows the adjustments required to move each class to its cost of service at Evergy's proposed revenue level. They range from an increase of 30% for the Residential class to a decrease of 13% for the Large General Service ("LGS") class.

7. The rates for all classes of customers are so far from cost of service that equity demands a significant movement toward cost of service be made.

8. The increases to the Residential and Clean Charge Network ("CCN") classes should be set at the level proposed by Metro. To the extent that additional revenue is required to reach the awarded revenue level, it should be recovered by a uniform percentage increase over present rates of the remaining customer classes. If a decrease is required, it should be apportioned as an equal percent reduction to the remaining customer classes.

9. My rate design recommendations are set forth on page 28 of this testimony.

COST OF SERVICE PROCEDURES

Overview

Q PLEASE DESCRIBE THE COST ALLOCATION PROCESS.

A The objective of *cost allocation* is to determine what proportion of the utility's total revenue requirement should be recovered from each customer class. As an aid to this determination, cost of service studies are usually performed to determine the portions of the total costs that are incurred to serve each customer class. The cost of service study identifies the cost responsibility of the class and provides the foundation for revenue allocation and rate design. For many regulators, cost-based rates are an expressed goal. To better interpret cost allocation and cost of service studies, it is important to understand the production and delivery of electricity.

Electricity Fundamentals

Q IS ELECTRICITY SERVICE LIKE ANY OTHER GOODS OR SERVICES?

A No. Electricity is different from most other goods or services purchased by consumers. For example:

- It cannot be stored in large quantities for a significant period of time; it must be delivered as produced;
- It must be delivered to the customer's home or place of business;
- The delivery occurs instantaneously when and in the amount needed by the customer; and
- Both the total quantity used (energy or kWh) by a customer <u>and</u> the rate of use (demand or kW) are important.

These unique characteristics differentiate electric utilities from other service-related industries.

The service provided by electric utilities is multi-dimensional. First, unlike most vital services, electricity must be delivered at the place of consumption – homes, schools, businesses, factories – because this is where the lights, appliances, machines, air conditioning, etc. are located. Thus, every utility must provide a path through which electricity can be delivered regardless of the customer's **demand** and **energy** requirements at any point in time.

Even at the same location, electricity may be used in a variety of applications. Homeowners, for example, use electricity for lighting, air conditioning, perhaps heating, and to operate various appliances. At any instant, several appliances may be operating (e.g., lights, refrigerator, TV, air conditioning, etc.). Which appliances are used and when reflects the second dimension of utility service – the rate of electricity use or **demand**. The demand imposed by customers is an especially important characteristic because the maximum demands determine how much capacity the utility is obligated to provide.

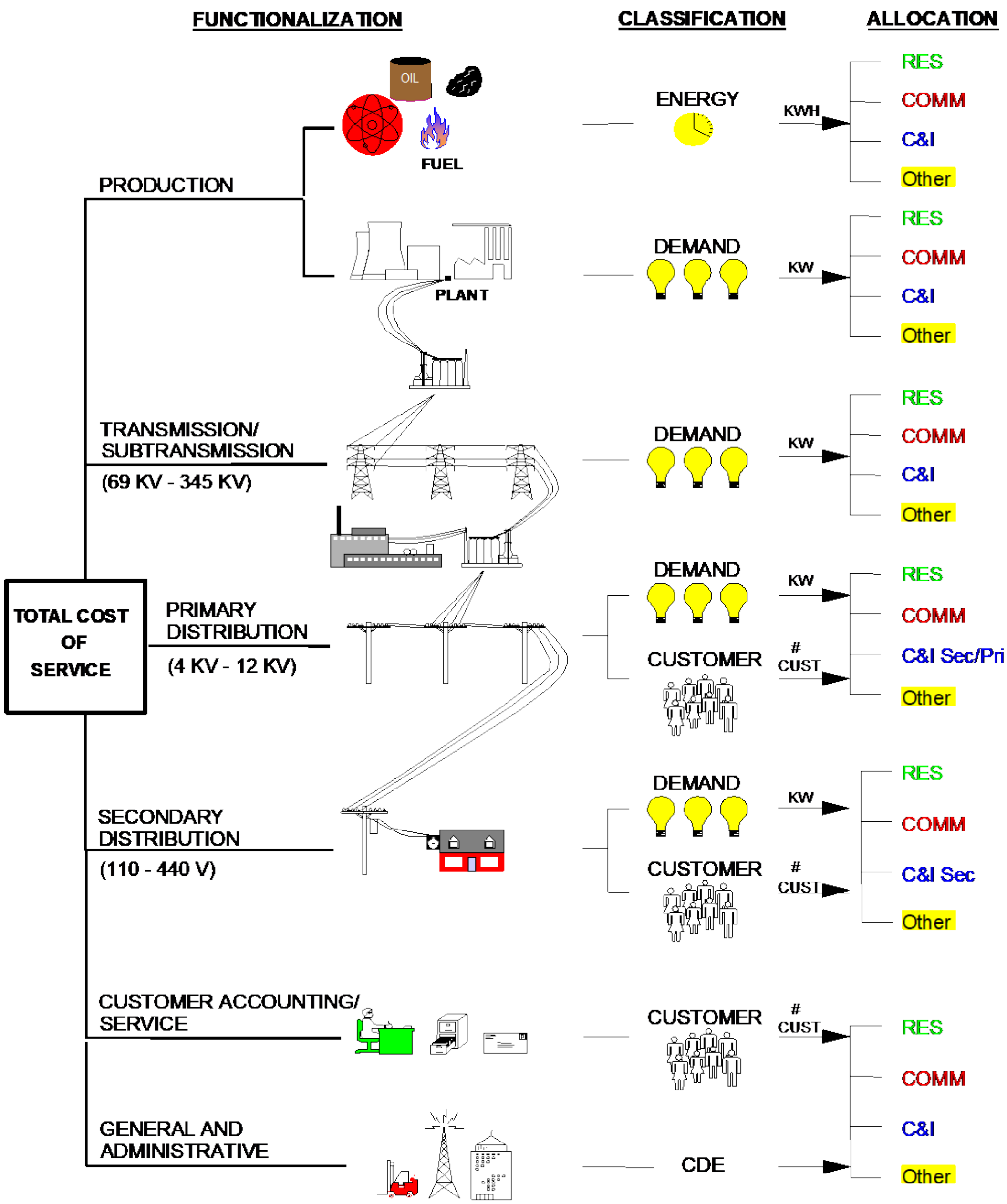
Generating units, transmission lines and substations and distribution lines and substations are rated according to the maximum demand that can safely be imposed on them. (They are not rated according to average annual demand; that is, the amount of energy consumed during the year divided by 8,760 hours.) On a hot summer afternoon when customers demand 2,000 MW of electricity, the utility must have at least 2,000 MW of generation, plus additional capacity to provide adequate reserves, so that when a consumer flips the switch, the lights turn on, the machines operate and air conditioning systems cool our homes, schools, offices, and factories.

Satisfying customers' demand for electricity over time – providing **energy** – is the third dimension of utility service. It is also the dimension with which many people are most familiar, because people often think of electricity simply in terms of kWhs. To see one reason why this isn't so simple, consider a more familiar commodity – tomatoes, for example.

The tomatoes we buy at the supermarket for about $1.50 a pound might originally come from Florida where they are bought for about 30¢ a pound. In addition to the cost of buying them at the point of production, there is the cost of bringing them to the state of Missouri and distributing them in bulk to local wholesalers. The cost of transportation, insurance, handling and warehousing must be added to the original 30¢ a pound. Then they are distributed to neighborhood stores, which adds more handling costs as well as the store's own costs of light, heat, personnel and rent. Shoppers can then purchase as many or few tomatoes as they desire at their convenience. In addition, there are losses from spoilage and damage in handling. These "line losses" represent an additional cost which must be recovered in the final price. What we are really paying for at the store is not only the vegetable itself, but the <u>service</u> of having it available in convenient amounts and locations. If we took the time and trouble (and expense) to go down to the wholesale produce distributor, the price would be less. If we could arrange to buy them in bulk in Florida, they would be even cheaper.

As illustrated in Figure 1, electric utilities are similar, except that in most cases (including Missouri), a single company handles everything from production on down through wholesale (bulk and area transmission) and retail (distribution to homes and stores). The crucial difference is that, unlike producers and distributors of tomatoes, electric utilities have an obligation to provide continuous reliable service. The obligation is assumed in return for the exclusive right to serve all customers located within its territorial franchise. In addition to satisfying the energy (or kWh) requirements of its customers, the obligation to serve means that the utility must also provide the necessary facilities to attach customers to the grid (so that service can be used at the point where it is to be consumed) and these facilities must be responsive to changes in the kilowatt demands whenever they occur.

Figure 1
PRODUCTION AND DELIVERY OF ELECTRICITY



A CLOSER LOOK AT THE COST OF SERVICE STUDY

Q PLEASE EXPLAIN HOW A COST OF SERVICE STUDY IS PREPARED.

A To the extent possible, the unique characteristics that differentiate electric utilities from other service-related industries should be recognized in determining the cost of providing service to each of the various customer classes. The basic procedure for conducting a class cost of service study is simple. In an allocated cost of service study, we identify the different types of costs (**functionalization**), determine their primary causative factors (**classification**) and then apportion each item of cost among the various rate classes (**allocation**). Adding up the individual pieces gives the total cost for each customer class.

Functionalization

Q PLEASE EXPLAIN FUNCTIONALIZATION.

A Identifying the different levels of operation is a process referred to as **functionalization**. The utility's investment and expenses are separated by function (production, transmission, distribution, etc.). To a large extent, this is done in accordance with the Uniform System of Accounts.

Referring to Figure 1, at the top level there is generation, sometimes called production. The next level is the extra high voltage transmission and subtransmission system (69,000 volts to 345,000 volts). Then the voltage is stepped down to primary voltage levels of distribution – 4,160 to 12,000 volts. Finally, the voltage is stepped down by pole transformers at the "secondary" level to 110-440 volts used to serve homes, barbershops, light manufacturing and the like. Additional investment and expenses are required to serve customers at secondary voltages, compared to the cost of serving customers at higher voltage.

Each additional transformation, thus, requires additional investment, additional expenses and results in some additional electrical losses. To say that "a kilowatthour is a kilowatthour" is like saying that "a tomato is a tomato." It's true in one sense, but when you buy a kWh at home you're not only buying the energy itself but also the service of having it delivered instantaneously right to your doorstep in convenient form. Those who buy at the bulk or wholesale level – like some of the Large Power Service ("LPS") customers – pay less because some of the expenses to the utility are avoided. (Actually, the expenses are borne by the customer who must invest in transformers and other equipment, or pay separately for some services.)

Classification

Q WHAT IS CLASSIFICATION?

A Once the costs have been functionalized, the next step is to identify the primary causative factor (or factors). This step is referred to as **classification**. Costs are classified as demand-related, energy-related or customer-related.

Looking at the production function, the amount of production plant capacity required is primarily determined by the peak rate of usage during the year. If the utility anticipates a peak demand of 2,000 MW – it must install and/or contract for enough generating capacity to meet that anticipated demand (plus some reserve to compensate for variations in load and capacity that is temporarily unavailable).

In almost all hours during the day or during the year, not all of this generating capacity will be needed. Nevertheless, it must be in place to meet the peak demands on the system. Thus, production plant investment is usually classified to demand. **Regardless of how production plant investment is classified, the associated capital costs** (which include return on investment, depreciation, fixed operation and maintenance ("O&M") expenses, taxes and insurance) **are fixed;** that is, **<u>they do not vary with the amount of kWhs generated and sold</u>**. These fixed costs are determined by the amount of capacity (i.e., kilowatts) that the utility must install to satisfy its obligation-to-serve requirement.

On the other hand, it is easy to see that the amount of fuel burned – and therefore the amount of fuel expense – is closely related to the amount of energy (number of kWhs) that customers use. Therefore, fuel expense is an energy-related cost.

Most other O&M expenses are fixed and therefore are classified as demand-related. Variable O&M expenses are classified as energy-related. Demand-related and energy-related types of operating costs are not impacted by the number of customers served.

Customer-related costs are the third major category. Obvious examples of customer-related costs include the investment in meters and service drops (the line from the pole to the customer's facility or house). Along with meter reading, posting accounts and rendering bills, these "customer costs" may be several dollars per customer, per month. Less obvious examples of customer-related costs may include the investment in other distribution plant accounts such as poles and overhead conductors.

A certain portion of the cost of the distribution system – poles, wires and transformers – is required simply to attach customers to the system, regardless of their demand or energy requirements. This minimum or "skeleton" distribution system may also be considered a customer-related cost since it depends primarily on the number of customers, rather than demand or energy usage.

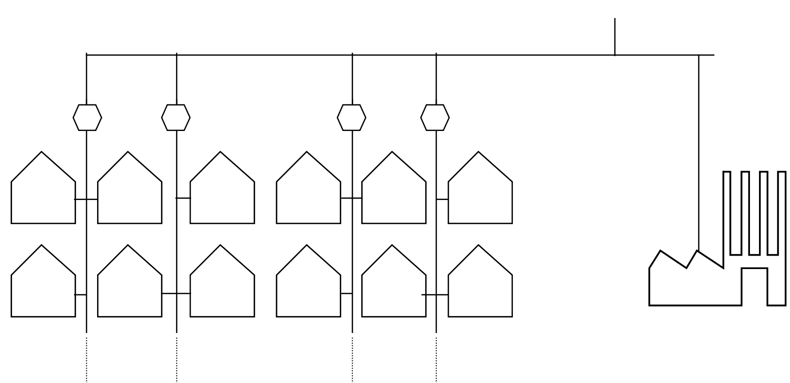
Figure 2, as an example, shows the distribution network for a utility with two customer classes, A and B. The physical distribution network necessary to attach Class A is designed to serve 12 customers, each with a 10-kilowatt load, having a total demand of 120 kW. This is the same total demand as is imposed by Class B, which consists of a single customer. Clearly, a much more extensive distribution system is required to attach the multitude of small customers (Class A), than to attach the single larger customer (Class B), despite the fact that the total demand of each customer class is the same.

Even though some additional customers can be attached without additional investment in some areas of the system, it is obvious that attaching a large number of customers requires investment in facilities, not only initially but on a continuing basis as a result of the need for maintenance and repair.

To the extent that the distribution system components must be sized to accommodate additional load beyond the minimum, the balance is a demand-related cost. Thus, the distribution system is classified as both demand-related and customer-related.

Figure 2

Classification of Distribution Investment



Total Demand = 120 kW

Class A

Total Demand = 120 kW

Class B

Demand vs. Energy Costs

Q WHAT IS THE DISTINCTION BETWEEN DEMAND-RELATED COSTS AND ENERGY-RELATED COSTS?

A The difference between demand-related and energy-related costs explains the fallacy of the argument that "a kilowatthour is a kilowatthour." For example, Figure 3 compares the electrical requirements of two customers, A and B, each using 100-watt light bulbs.

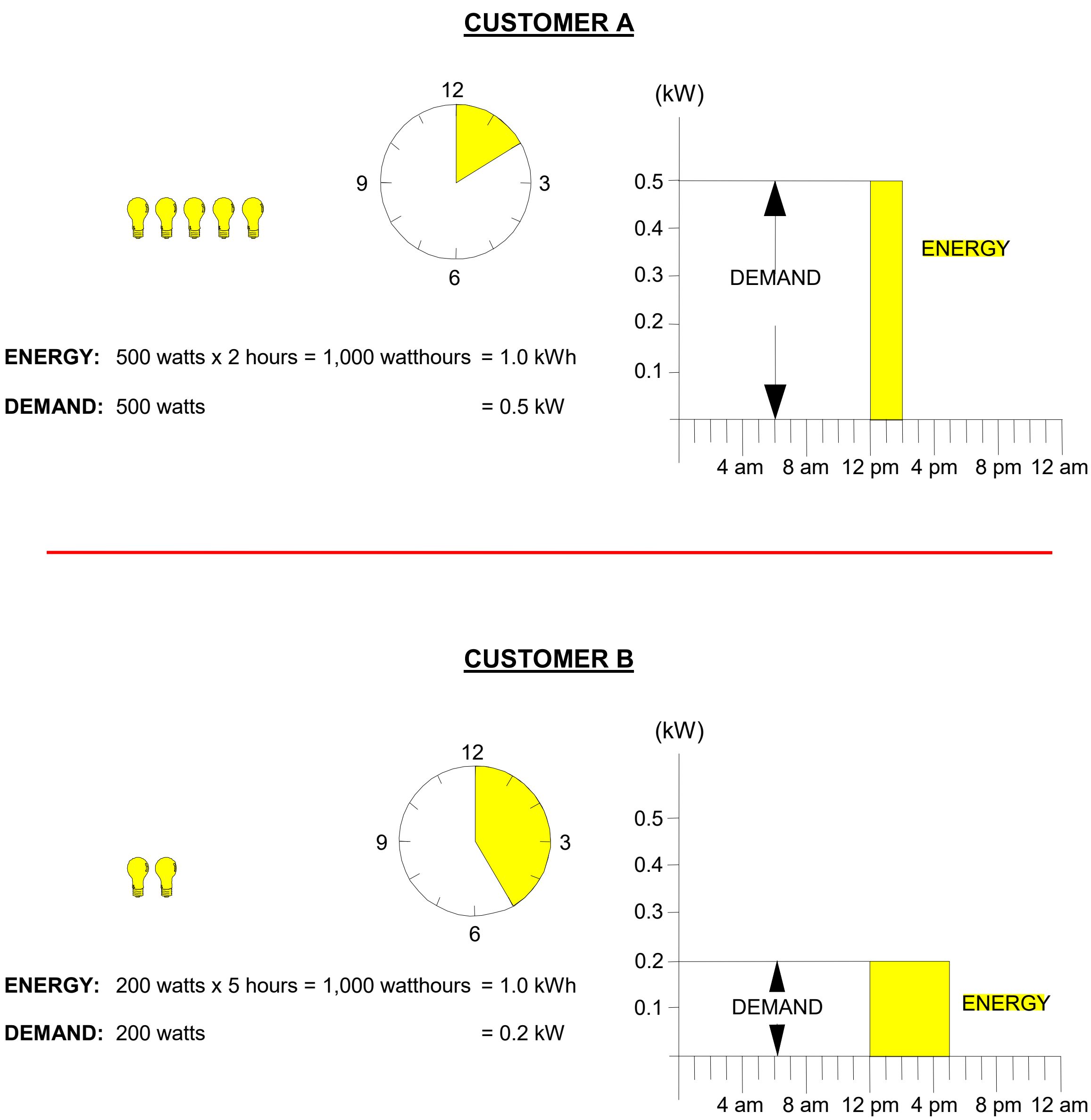
Customer A turns on all five of his/her 100-watt light bulbs for two hours. Customer B, by contrast, turns on two light bulbs for five hours. Both customers use the same amount of energy – 1,000 watthours or 1 kWh. However, Customer A utilized electric power at a higher rate, 500 watts per hour or 0.5 kW, than Customer B who demanded only 200 watts per hour or 0.2 kW.

Although both customers had precisely the same kWh energy usage, Customer A's kW demand was 2.5 times Customer B's. Therefore, the utility must install 2.5 times as much generating capacity for Customer A as for Customer B. The cost of serving Customer A, therefore, is much higher.

Q DOES THIS HAVE ANYTHING TO DO WITH THE CONCEPT OF LOAD FACTOR?

A Yes. Load factor is an expression of how uniformly a customer uses energy. In our example of the light bulbs, the load factor of Customer B would be higher than the load factor of Customer A because the use of electricity was spread over a longer period of time, and the number of kWhs used for each kilowatt of demand imposed on the system is much greater in the case of Customer B.

Figure 3
DEMAND VS. ENERGY



Mathematically, load factor is the average rate of use divided by the peak rate of use. A customer with a higher load factor is less expensive to serve, on a per kWh basis, than a customer with a low load factor, irrespective of size.

Consider also the analogy of a rental car which costs $40/day and 20¢/mile. If Customer A drives only 20 miles a day, the average cost will be $2.20/mile. But for Customer B, who drives 200 miles a day, spreading the daily rental charge over the total mileage gives an average cost of 40¢/mile. For both customers, the fixed cost rate (daily charge) and variable cost rate (mileage charge) are identical, but the average total cost per mile will differ depending on how intensively the car is used. Likewise, the average cost per kWh will depend on how intensively the generating plant is used. A low load factor indicates that the capacity is idle much of the time; a high load factor indicates a more steady rate of usage. Since industrial customers generally have higher load factors than residential or commercial customers, they are less costly to serve on a per-kWh basis. Again, we can say that "a kilowatthour is a kilowatthour" as to energy content, but there may be a big difference in how much generating plant investment is required to convert the raw fuel into electric energy.

Allocation

Q WHAT IS ALLOCATION?

A The final step in the cost of service analysis is the **allocation** of the costs to the customer classes. Demand, energy and customer allocation factors are developed to apportion the costs among the customer classes. Each factor measures the customer class's contribution to the system total cost.

For example, we have already determined that the amount of fuel expense on the system is a function of the energy required by customers. In order to allocate this expense among classes, we must determine how much each class contributes to the total kWh consumption and we must recognize the line losses associated with transporting and distributing the kWh. These contributions, expressed in percentage terms, are then multiplied by the expense to determine how much expense should be attributed to each class. For demand-related costs, we construct an allocation factor by looking at the important class demands.

Utility System Characteristics

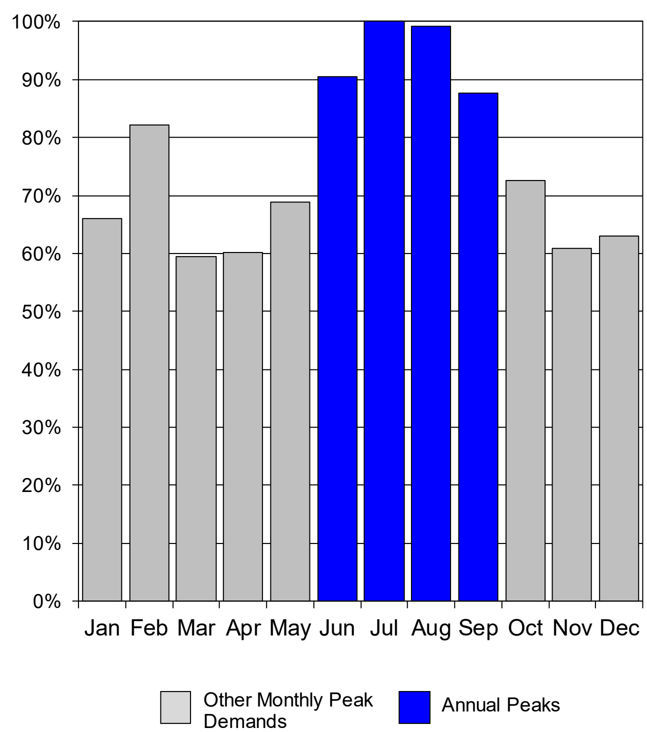
Q WHAT IS THE IMPORTANCE OF UTILITY SYSTEM LOAD CHARACTERISTICS?

A Utility system load characteristics are an important factor in determining the specific method that should be employed to allocate fixed or demand-related costs on a utility system. The most important characteristic is the annual load pattern of the utility. These characteristics for Metro are shown here as Figure 4.

Figure 4

EVERGY METRO, INC.
Case No. ER-2022-0129

Analysis of Evergy-Metro's Monthly Peak Demands
as a Percent of the Annual System Peak
For Calendar Year 2021



This shows the monthly system peak demands for 2021. The highlighted bars show the months in which the highest peak occurred.

This analysis shows that summer peaks dominate the Metro system. This clearly shows that the system peak occurred in July, and was substantially higher than the monthly peaks occurring in most other months. The peaks in June, August and September were only 9.4%, 0.7%, and 12.7%, respectively, lower than the annual peak (July), while peaks in other months were substantially lower.

Q WHAT CRITERIA SHOULD BE USED TO DETERMINE AN APPROPRIATE METHOD FOR ALLOCATING PRODUCTION AND TRANSMISSION CAPACITY COSTS AMONG THE VARIOUS CUSTOMER CLASSES?

A The specific allocation method should be consistent with the principle of cost-causation; that is, the allocation should reflect the contribution of each customer class to the demands that caused the utility to incur capacity costs.

Q WHAT FACTORS CAUSE ELECTRIC UTILITIES TO INCUR PRODUCTION AND TRANSMISSION CAPACITY COSTS?

A As discussed previously, production and transmission plant must be sized to meet the maximum demand imposed on these facilities. Thus, an appropriate allocation method should accurately reflect the characteristics of the loads served by the utility. For example, if a utility has a high summer peak relative to the demands in other seasons, then production and transmission capacity costs should be allocated relative to each customer class's contribution to the summer peak demands. If a utility has predominant peaks in both the summer and winter periods, then an appropriate allocation method would be based on the demands imposed during both the summer and winter peak periods. For a utility with a very high load factor and/or a non-seasonal load pattern, then demands in all months may be important.

Q WHAT DO THESE CONSIDERATIONS MEAN IN THE CONTEXT OF THE METRO SYSTEM?

A As noted, the Metro load pattern has predominant summer peaks. This means that these demands should be the primary ones used in the allocation of generation and transmission costs. Demands in other months are of much less significance, do not compel the addition of generation capacity to serve them and should not be used in determining the allocation of costs.

Q WHAT SPECIFIC RECOMMENDATIONS DO YOU HAVE?

A The two most predominantly used allocation methods in the industry are the coincident peak method and the A&E demand method.

The coincident method utilizes the demands of customer classes occurring at the time of the system peak or peaks selected for allocation. In the case of Metro, this would be one or more peaks occurring during the summer.

Q WHAT IS THE A&E METHOD?

A The A&E method is one of a family of methods that incorporates a consideration of both the maximum rate of use (demand) and the duration of use (energy). As the name implies, A&E makes a conceptual split of the system into an "average" component and an "excess" component. The "average" demand is simply the total kWh usage divided by the total number of hours in the year. This is the amount of capacity that would be required to produce the energy if it were taken at the same demand rate each hour.

The system "excess" demand is the difference between the system peak demand and the system average demand.

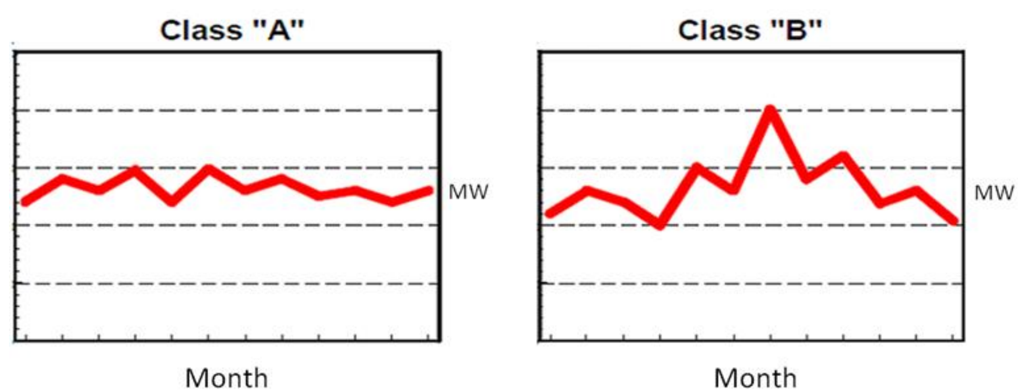
Under the A&E method, the average demand is allocated to classes in proportion to their average demand (energy usage). The difference between the system average demand and the system peak(s) is then allocated to customer classes on the basis of a measure that represents their contribution to the "peaking" or variability in usage.[1]

Q WHAT DO YOU MEAN BY VARIABILITY IN USAGE?

A As an example, Figure 5 shows two classes that have different monthly usage patterns.

Figure 5

Load Patterns



Both classes use the same total amount of energy and, therefore, have the same average demand. Class B, though, has a much greater maximum demand[2] than Class A. The greater maximum demand imposes greater costs on the utility system. This is because the utility must provide sufficient capacity to meet the projected

[1]NARUC Electric Utility Cost Allocation Manual, 1992, page 81.

[2]During any specified time period (e.g., month, year), the maximum demand of a class, regardless of when it occurs, is called the non-coincident peak demand.

maximum demands of its customers. There may also be higher costs due to the greater variability of usage of some classes. This variability requires that a utility cycle its generating units in order to match output with demand on a real time basis. The stress of cycling generating units up and down causes wear and tear on the equipment, resulting in higher maintenance cost.

Thus, the excess component of the A&E method is an attempt to allocate the additional capacity requirements of the system (measured by the system excess) in proportion to the "peakiness" of the customer classes (measured by the class excess demands).

Q WHAT DEMAND ALLOCATION METHODOLOGY DO YOU RECOMMEND FOR GENERATION AND TRANSMISSION?

A First, in order to reflect cost-causation the methodology must give predominant weight to loads occurring during the summer months. Loads during these months (the peak loads) are the primary driver that has and continues to cause the utility to expand its generation and transmission capacity, and therefore should be given predominant weight in the allocation of capacity costs.

Either a coincident peak study, using the demands during the summer (peak) months, or a version of an A&E cost of service study that uses class demands occurring during the summer, would be most appropriate to reflect these characteristics. The results should be similar as long as only summer period peak loads are used. I recommend the A&E method.

Q DO YOU AGREE WITH THE A&E-4CP STUDY PRESENTED BY METRO?

A Yes. Given Metro's load characteristics, I find this study to be reasonable.

Making the Cost of Service Study – Summary

Q PLEASE SUMMARIZE THE PROCESS AND THE RESULTS OF A COST OF SERVICE ANALYSIS.

A As previously discussed, the cost of service procedure involves three steps:

1. Functionalization – Identify the different functional "levels" of the system;
2. Classification – Determine, for each functional type, the primary cause or causes (customer, demand or energy) of that cost being incurred; and
3. Allocation – Calculate the class proportional responsibilities for each type of cost and spread the cost among classes.

Q WHERE ARE THE COST OF SERVICE RESULTS PRESENTED?

A The results are presented in Schedule MEB-COS-1, which reflects results at present rates.

Q REFERRING TO SCHEDULE MEB-COS-1, PLEASE EXPLAIN THE ORGANIZATION AND WHAT IS SHOWN.

A Schedule MEB-COS-1 is a summary of the results of Metro's class cost of service study, based on an A&E-4CP cost of service study.

Column 1 shows the rate of return at present rates for each customer class based on this cost of service study, and Column 2 shows the percentage relationship of each class to the system average. A "relative" rate of return less than 1.0 (or negative) means that the class has a rate of return below the system average and is paying less than its cost of service. Conversely, a relative rate of return larger than 1.0 means that the class is paying more than its cost of service.

Adjustment of Class Revenues

Q WHAT SHOULD BE THE PRIMARY BASIS FOR ESTABLISHING CLASS REVENUE REQUIREMENTS AND DESIGNING RATES?

A Cost should be the primary factor used in both steps.

Just as cost of service is used to establish a utility's total revenue requirement, it should also be the primary basis used to establish the revenues collected from each customer class and to design rate schedules.

Factors such as simplicity, gradualism and ease of administration may also be taken into account, but the basic starting point and guideline throughout the process should be cost of service. To the extent practicable, rate schedules should be structured and designed to reflect the important cost-causative features of the service provided, and to collect the appropriate cost from the customers within each class or rate schedule, based upon the individual load patterns exhibited by those customers.

Electric rates also play a role in economic development, both with respect to job creation and job retention. This is particularly true in the case of industries where electricity is one of the largest components of the cost of production.

Q WHAT IS THE BASIS FOR YOUR RECOMMENDATION THAT COST BE USED AS THE PRIMARY FACTOR FOR THESE PURPOSES?

A The basic reasons for using cost as the primary factor are equity, conservation, and engineering efficiency (cost-minimization).

Q PLEASE EXPLAIN HOW EQUITY IS ACHIEVED BY BASING RATES ON COST.

A When rates are based on cost, each customer pays what it costs the utility to provide service to that customer; no more and no less. If rates are based on anything other than cost factors, then some customers will pay the costs attributable to providing service to other customers – which is inherently inequitable.

Q HOW DO COST-BASED RATES FURTHER THE GOAL OF CONSERVATION?

A Conservation occurs when wasteful, inefficient use is discouraged or minimized. Only when rates are based on costs do customers receive a balanced price signal upon which to make their electric consumption decisions. If rates are not based on costs, then customers who are not paying their full costs may be misled into using electricity inefficiently in response to the distorted rate design signals they receive.

Q WILL COST-BASED RATES ASSIST IN THE DEVELOPMENT OF COST-EFFECTIVE DEMAND-SIDE MANAGEMENT ("DSM") PROGRAMS?

A Yes. The success of DSM (both energy efficiency and demand response programs) depends, to a large extent, on customer receptivity. There are many actions that can be taken by consumers to reduce their electricity requirements. A major element in a customer's decision-making process is the amount of reduction that can be achieved in the electric bill as a result of DSM activities. If the bill received by a customer is subsidized by other customers; that is, the bill is determined using rates that are below cost, that customer will have less reason to engage in DSM activities than when the bill reflects the actual cost of the electric service provided.

For example, assume that the relevant cost to produce and deliver energy is 8¢ per kWh. If a customer has an opportunity to install energy efficiency or DSM equipment that would allow the customer to reduce energy use or demand, the customer will be much more likely to make that investment if the price of electricity equals the cost of electricity, i.e., 8¢ per kWh, than if the customer is receiving a subsidized rate of 6¢ per kWh.

Q HOW DO COST-BASED RATES ACHIEVE THE COST-MINIMIZATION OBJECTIVE?

A When the rates are designed so that the energy costs, demand costs and customer costs are properly reflected in the energy, demand and customer components of the rate schedules, respectively, customers are provided with the proper incentives to minimize their costs, which will in turn minimize the costs to the utility.

If a utility attempts to extract a disproportionate share of revenues from a class that has alternatives available (such as producing products at other locations where costs are lower), then the utility will be faced with the situation where it must discount the rates or lose the load, either in part or in total. To the extent that the load could have been served more economically by the utility, then either the other customers of the utility or the stockholders (or some combination of both) will be worse off than if the rates were properly designed on the basis of cost.

From a rate design perspective, overpricing the energy portion of the rate and underpricing the fixed components of the rate (such as customer and demand charges) will result in a disproportionate share of revenues being collected from large customers and high load factor customers. To the extent that these customers may have lower cost alternatives than do the smaller or the low load factor customers, the same problems noted above are created.

REVENUE ALLOCATION

Q PLEASE REFER AGAIN TO SCHEDULE MEB-COS-1 AND SUMMARIZE THE RESULTS OF METRO'S CLASS COST OF SERVICE STUDY.

A The Residential class has a rate of return far below the system average, which means it is not covering its cost of service. On the other hand, all other customers (except for CCN) are being charged far more than their cost of service.

Q WHAT ADJUSTMENTS TO REVENUES WOULD BE REQUIRED TO MOVE ALL CLASSES TO COST OF SERVICE?

A This is shown on Schedule MEB-COS-2.

Column 1 shows revenues under present rates, Column 2 shows the dollar increase required to reach cost of service and Column 3 shows the percentage increase required. Column 4 express the required percentage increase on an index basis in comparison to the overall average increase. Note that the Residential class would require an increase of over five times the average to achieve cost of service whereas the LPS class, for example, requires a significant decrease to move it down to cost of service.

Q WHAT ALLOCATION OF THE REQUESTED REVENUE INCREASE IS PROPOSED BY EVERGY?

A This is shown on Schedule MEB-COS-3. Column 1 shows the dollar increase proposed by Evergy and Column 2 shows the resulting percentage increase.

Q WHAT IS SHOWN ON SCHEDULE MEB-COS-4?

A Schedule MEB-COS-4 shows the increases proposed by Evergy compared to the increases required to achieve cost of service at Evergy's proposed revenue level. Column 1 shows the dollar increase proposed by Evergy and Column 2 shows the resulting percentage increase. Column 3 shows the increase required to achieve cost of service and Column 4 shows the required percentage increase. Column 5 shows the requested increase as a percent (or a fraction) of the required increase. Note for the Residential class that the proposed increase is only 25% of that required, whereas for the LPS class an increase is proposed although a large decrease is warranted.

Q WOULD METRO'S ALLOCATION MOVE CLASS RATES CLOSER TO COST OF SERVICE?

A Not appreciably. Metro's allocation would essentially maintain the status quo in which the Residential class is far below cost of service, and other classes are above cost of service.

Q WHAT IS YOUR RECOMMENDATION CONCERNING ALLOCATION TO THE VARIOUS CUSTOMER CLASSES OF METRO'S PROPOSED CHANGE IN REVENUES?

A The movement toward cost of service should be no less than what results under Metro's proposed allocation of its proposed revenue increase. More aggressive movements would be more appropriate, but Metro's proposal represents the very bare minimum amount that should be accomplished.

Q WHAT IS YOUR RECOMMENDATION IF METRO DOES NOT RECEIVE AS MUCH OF AN INCREASE AS IT HAS REQUESTED?

A In the event that Metro does not receive as large an overall increase as it has requested, I recommend that the increases proposed for the Residential class and the CCN be maintained at the level proposed by Metro. The difference between the awarded revenue increase and the increase proposed by Metro for the Residential and CCN classes should be distributed proportionately to the other customer classes as an equal percentage increase over current revenues.

Q CAN YOU ILLUSTRATE?

A Yes. Suppose, for illustrative purposes only, that instead of an overall increase of $47.715 million for Metro, the increase turns out to be $32 million. The Residential class and the CCN together would produce an increase of $26.354 million, leaving $5.646 million to be collected when increasing the remaining customer classes. The present revenue from the remaining customer classes is $502.132 million, so the resulting increase to these classes of $5.646 million would be about 1.12%. This method of adjusting the proposed increase so as to retain the amount of the increase for the Residential class and the CCN as proposed by Metro can be applied to any other level of overall increase.

If, after accounting for the proposed increase to the Residential class and the CCN, a decrease is required, it should be apportioned as an equal percentage decrease to the remaining customer classes.

Q WHAT IS THE IMPORTANCE OF MOVING INDUSTRIAL RATES CLOSER TO COST OF SERVICE?

A The testimony of KCPL's witness Sullivan in the previous rate case (Case No. ER-2018-0145) said the following, which is just as applicable today.

Mr. Sullivan's testimony is particularly enlightening with respect to the importance of competition and the level of industrial rates. In discussing why it matters which methodology for cost of service is used by other utilities (he uses Ameren and Westar as examples), Mr. Sullivan states the following at pages 25 and 26 of his direct testimony:

> "The primary reason it matters deals with competition and specifically competition for industrial customers. As discussed earlier in my testimony, KCP&L's industrial customers generally have a very high load factor, much higher than the system average and much higher than the other customer classes. As will be discussed in the next section of my testimony, of the three methodologies predominantly recommended in Missouri and Kansas, the A&E methodology is the only method that gives a significant recognition to the relative load factors of the customer classes. Further, when a system is not operating at a very high load factor, the A&E methodology best assigns the higher cost of unused capacity.
>
> If the CCOS study is used as a principle tool in assigning the utility revenue requirement to customer classes and thus rate design, industrial cost responsibility and thus industrial rates for utilities using the A&E methodology will be lower than using either of the other two methodologies, all other things being equal. Thus, if the rates for the two major utilities with which KCP&L competes are using the A&E methodology and KCP&L is not, KCP&L will be at a competitive disadvantage in attracting and retaining industrial load.
>
> **Q. Why is it important to attract and retain industrial load?**
>
> A. There are numerous reasons why this is important. First, industrial customers have higher load factors that increase the overall efficiency of the electric system, particularly generation and transmission facilities. The loads are stable throughout the day, allowing the utility to invest in lower cost base load generating facilities. Second, industrial customers usually provide a large amount of direct and indirect jobs. The direct jobs are associated with the industrial facility itself. The indirect jobs include the supporting companies that provide materials to the facility and the

> residential and commercial development supported by the employees of the industrial company."

RATE DESIGN

Q HOW DO YOU PROPOSE TO ADJUST THE LGS AND LPS RATES IN THIS CASE?

A As a starting point, I believe Metro's proposal at the level of overall increase net Metro is requesting from these schedules is appropriate.

To the extent that the final outcome is less revenue from either of these rate schedules than has been proposed by Metro, I would reduce the proposed energy charges by a uniform amount per kWh to achieve the adjusted revenue target. In the unlikely event that the final outcome would be a revenue requirement from these rates higher than what Metro has proposed, I would recommend increasing the demand and customer charges by the same percentage in order to collect the additional revenue.

.

Q DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A Yes, it does.

Qualifications of Maurice Brubaker

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A Maurice Brubaker. My business address is 16690 Swingley Ridge Road, Suite 140, Chesterfield, MO 63017.

Q PLEASE STATE YOUR OCCUPATION.

A I am a consultant in the field of public utility regulation and President of the firm of Brubaker & Associates, Inc. ("BAI"), energy, economic and regulatory consultants.

Q PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A I was graduated from the University of Missouri in 1965, with a Bachelor's Degree in Electrical Engineering. Subsequent to graduation I was employed by the Utilities Section of the Engineering and Technology Division of Esso Research and Engineering Corporation of Morristown, New Jersey, a subsidiary of Standard Oil of New Jersey.

In the Fall of 1965, I enrolled in the Graduate School of Business at Washington University in St. Louis, Missouri. I was graduated in June of 1967 with the Degree of Master of Business Administration. My major field was finance.

From March of 1966 until March of 1970, I was employed by Emerson Electric Company in St. Louis. During this time I pursued the Degree of Master of Science in Engineering at Washington University, which I received in June, 1970.

In March of 1970, I joined the firm of Drazen Associates, Inc., of St. Louis, Missouri. Since that time I have been engaged in the preparation of numerous studies relating to electric, gas, and water utilities. These studies have included analyses of the cost to serve various types of customers, the design of rates for utility services, cost forecasts, cogeneration rates and determinations of rate base and operating income. I have also addressed utility resource planning principles and plans, reviewed capacity additions to determine whether or not they were used and useful, addressed demand-side management issues independently and as part of least cost planning, and have reviewed utility determinations of the need for capacity additions and/or purchased power to determine the consistency of such plans with least cost planning principles. I have also testified about the prudency of the actions undertaken by utilities to meet the needs of their customers in the wholesale power markets and have recommended disallowances of costs where such actions were deemed imprudent.

I have testified before the Federal Energy Regulatory Commission ("FERC"), various courts and legislatures, and the state regulatory commissions of Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia, Guam, Hawaii, Illinois, Indiana, Iowa, Kentucky, Louisiana, Michigan, Missouri, Nevada, New Jersey, New Mexico, New York, North Carolina, Ohio, Pennsylvania, Rhode Island, South Carolina, South Dakota, Texas, Utah, Virginia, West Virginia, Wisconsin and Wyoming.

The firm of Drazen-Brubaker & Associates, Inc. was incorporated in 1972 and assumed the utility rate and economic consulting activities of Drazen Associates, Inc., founded in 1937. In April, 1995 the firm of Brubaker & Associates, Inc. was formed. It includes most of the former DBA principals and staff. Our staff includes consultants with backgrounds in accounting, engineering, economics, finance, mathematics, computer science and business.

Brubaker & Associates, Inc. and its predecessor firm have participated in over 700 major utility rate and other cases and statewide generic investigations before utility regulatory commissions in 40 states, involving electric, gas, water, and steam rates and other issues. Cases in which the firm has been involved have included more than 80 of the 100 largest electric utilities and over 30 gas distribution companies and pipelines.

While the firm has always assisted its clients in negotiating contracts for utility services in the regulated environment, increasingly there are opportunities for certain customers to acquire power on a competitive basis from a supplier other than its traditional electric utility. The firm assists clients in identifying and evaluating purchased power options, conducts RFPs and negotiates with suppliers for the acquisition and delivery of supplies. We have prepared option studies and/or conducted RFPs for competitive acquisition of power supply for industrial and other end-use customers throughout the Unites States and in Canada, involving total needs in excess of 3,000 megawatts. The firm is also an associate member of the Electric Reliability Council of Texas.

In addition to our main office in St. Louis, the firm also has branch offices in Corpus Christi, Texas; Detroit, Michigan; Louisville, Kentucky and Phoenix, Arizona.

439769

EVERGY MISSOURI METRO
Case No. ER-2022-0129

Rate of Return at Present Rates

Line	Rate Class	Rate of Return (1)	Relative Rate of Return (2)
1	Residential	2.04%	0.35
2	Small General Service	9.08%	1.54
3	Medium General Service	10.11%	1.72
4	Large General Service	10.33%	1.76
5	Large Power Service	9.63%	1.64
6	Lighting	9.62%	1.64
7	Clean Charge Network	-55.49%	(9.43)
8	MO Metro Retail	5.88%	1.00

Source: Schedule MEM-1

EVERGY MISSOURI METRO
Case No. ER-2022-0129

Class Revenue Adjustments at
Evergy's Proposed Revenue Level
Required to Achieve Cost of Service

Line	Rate Class	Revenue under Present Rates ($000)	Increase Required: Amount ($000)	Increase Required: Percent %	Required Increase as a Percent of Average Increase
		(1)	(2)	(3)	(4)
1	Residential	$ 340,922	$ 104,309	30.6%	542%
2	Small General Service	$ 68,664	$ (6,280)	-9.1%	-162%
3	Medium General Service	$ 123,595	$ (15,908)	-12.9%	-228%
4	Large General Service	$ 178,461	$ (23,490)	-13.2%	-233%
5	Large Power Service	$ 121,482	$ (12,014)	-9.9%	-175%
6	Lighting	$ 9,931	$ (1,275)	-12.8%	-227%
7	Clean Charge Network	$ 75	$ 2,288	3068.9%	54324%
8	MO Metro Retail	$ 843,129	$ 47,631	5.6%	100%

Source: COS Summary per MIEC DR Set 2

EVERGY MISSOURI METRO
Case No. ER-2022-0129

Class Increases Proposed by Evergy

		Increase Proposed	
Line	Rate Class	Amount ($000)	Percent %
		(1)	(2)
1	Residential	$ 26,348	7.73%
2	Small General Service	$ 2,910	4.24%
3	Medium General Service	$ 5,249	4.24%
4	Large General Service	$ 7,612	4.24%
5	Large Power Service	$ 5,169	4.24%
6	Lighting	$ 421	4.24%
7	Clean Charge Network	$ 6	7.73%
8	MO Metro Retail	$ 47,715	5.65%

Source: Response to MIEC-1-1 Data Request

EVERGY MISSOURI METRO
Case No. ER-2022-0129

Increase Proposed by Evergy Compared to
Increase Required to Achieve Cost of Service at
Evergy's Proposed Revenue Level

Line	Rate Class	Increase Proposed		Increase Required		Proposed Increase as a Percent of Required Increase
		Amount ($000)	Percent %	Amount ($000)	Percent %	
		(1)	(2)	(3)	(4)	(5)
1	Residential	$ 26,348	7.73%	$ 104,309	30.60%	25%
2	Small General Service	$ 2,910	4.24%	$ (6,280)	-9.15%	*
3	Medium General Service	$ 5,249	4.24%	$ (15,908)	-12.87%	*
4	Large General Service	$ 7,612	4.24%	$ (23,490)	-13.16%	*
5	Large Power Service	$ 5,169	4.24%	$ (12,014)	-9.89%	*
6	Lighting	$ 421	4.24%	$ (1,275)	-12.84%	*
7	Clean Charge Network	$ 6	7.73%	$ 2,288	3068.88%	0.3%
8	MO Metro Retail	$ 47,715	5.65%	$ 47,631	5.65%	100%

* Decrease required

Source: MEB-COS-2 and MEB-COS-3