

Exhibit No.:
Issue(s): CCN Conditions
Witness: Sarah L.K. Lange
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: EA-2022-0234
Date Testimony Prepared: October 14, 2022

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

REBUTTAL TESTIMONY

OF

SARAH L.K. LANGE

NextEra Energy Transmission Southwest, LLC

CASE NO. EA-2022-0234

Jefferson City, Missouri
October 2022

Rebuttal Testimony of
Sarah L.K. Lange

1 that its FERC formula rate filings for the Wolf Creek to Blackberry Project will include caps
2 and conditions consistent with NEET SW's bid to SPP for the project and the commitments it
3 made in the settlement agreement reached in Kansas and approved by the Kansas Commission.”

4 Does Staff oppose this condition?

5 A. Staff does not oppose the portion of the condition that states “NEET SW will
6 commit that its FERC formula rate filings for the Wolf Creek to Blackberry Project will include
7 caps and conditions consistent with NEET SW's bid to SPP for the project.” However, I will
8 not offer an opinion on whether it is good practice for this Commission to order a utility
9 to comply with an Agreement entered into in a proceeding of a separate State, and approved
10 by the commission of a separate State. This second portion of Mr. Ives’ recommended condition
11 (a) appears designed to compel the Missouri Commission to ensure enforcement of an
12 agreement to which it was not a party and with which it is not familiar, and to give Evergy an
13 enforcement opportunity in a second venue for compliance with an agreement entered into in a
14 separate proceeding of a separate State. While it is possible that further support for second
15 portion of Mr. Ives’ recommended condition (a) will be adduced through the brief of Evergy,
16 Mr. Ives’ testimony does not provide sufficient evidence, context, or content to render this
17 request proper.

18 Q. Does this conclude your rebuttal testimony?

19 A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of NextEra)
Energy Transmission Southwest, LLC for a) Case No. EA-2022-0234
Certificate of Public Convenience and Necessity)
to Construct, Install, Own, Operate, Maintain,)
and Otherwise Control and Manage a 345 kV)
Transmission Line and associated facilities in
Barton and Jasper Counties, Missouri

AFFIDAVIT OF SARAH L.K. LANGE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW SARAH L.K. LANGE and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Sarah L.K. Lange*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.



SARAH L.K. LANGE

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 13th day of October 2022.

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: April 04, 2025 Commission Number: 12412070



Notary Public