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

1	REBUTTAL TESTIMONY
2	OF
3	SARAH L.K. LANGE
4	NextEra Energy Transmission Southwest, LLC
5	CASE NO. EA-2022-0234
6	Q. Please state your name and business address.
7	A. Sarah L.K. Lange and my business address is Missouri Public Service
8	Commission, P.O. Box 360, Jefferson City, Missouri, 65102.
9	Q. By whom are you employed and in what capacity?
10	A. I am employed by the Missouri Public Service Commission ("Commission")
11	as Economist in the Tariff/Rate Design Department, Industry Analysis Department,
12	Commission Staff Division.
13	Q. Are you the same Sarah L.K. Lange who contributed to the Staff
14	Recommendation Report filed September 22, 2022 in this case?
15	A. Yes.
16	Q. What is the purpose of your rebuttal testimony?
17	A. I am responding to the Direct Testimony of Evergy witness Darrin R. Ives
18	regarding his recommended condition (a) regarding FERC formula rate filings.
19	Dr. Seoung Joun Won, PhD responds to Evergy recommended condition (b) related to the
20	financial integrity of the Project. Claire M. Eubanks, PE responds to Evergy recommended
21	conditions (c) through (m).
22	Q. On page 13 of his Direct Testimony, Mr. Ives recommends imposition of a
23	condition that "(a) NextEra Energy Transmission Southwest, LLC ("NEET SW") will commit

- that its FERC formula rate filings for the Wolf Creek to Blackberry Project will include caps
  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?

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

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.

**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 \_\_\_\_\_/3 4h\_ 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 Motary Public Notary Public