

Exhibit No.:
Issue(s): *Purchased Power*
Agreement allocation
Witness: *J Luebbert*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *True-Up Rebuttal*
Testimony
Case Nos.: *ER-2022-0129 and*
ER-2022-0130
Date Testimony Prepared: *August 25, 2022*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

TRUE-UP REBUTTAL TESTIMONY

OF

J LUEBBERT

Evergy Metro, Inc. d/b/a Evergy Missouri Metro
Case No. ER-2022-0129

Evergy Missouri West, Inc. d/b/a Evergy Missouri West
Case No. ER-2022-0130

Jefferson City, Missouri
August 2022

1 A. Ms. Nunn appears to indicate in her workbook that the nameplate capacity of
2 the wind PPA assigned to Nucor has changed from ** [REDACTED]

3 [REDACTED]
4 [REDACTED] **

5 Q. Is this changed allocation consistent throughout Ms. Nunn's supportive
6 workbook?

7 A. No. Based on a limited review, it appears that the new allocation is only applied
8 to the capacity portion of costs associated with Nucor service.

9 Q. Did EMW provide Staff or the Commission with formal notice of the decision
10 to change the allocation of the wind PPA to Nucor?

11 A. No. Staff first discovered the potential change in allocation through the course
12 of discovery in this case. Based on the response to Staff data request 248.3, ** [REDACTED]

13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED] ** EMW's currently effective tariff indicates that 75 MW of the
17 total nameplate capacity is currently allocated to the Renewable Energy Rider.¹

18 Q. Is Staff opposed to changes in allocation of the wind PPA for Schedule SIL?

19 A. Not necessarily, but the change in allocation should be consistent, transparent,
20 and Staff and other parties need to know the effective date of such changes. If EMW intends to
21 allocate that portion of the wind PPA to Nucor, the Renewable Energy Rider tariff sheet should

¹ P.S.C. MO. No. 1 1st revised sheet No. 139.7.

1 also be updated accordingly. In order to improve the transparency of future changes in the
2 allocated amounts of special purpose wind PPAs, Staff recommends that the Commission order
3 EMW to provide the Commission and Staff with notice of intended changes to the allocations
4 of special purpose wind PPAs, the reason for the allocation change, the proposed effective date
5 of the change, and a summary of potential effects on rates or other tariff mechanisms 30 days
6 prior to such changes taking effect.

7 Q. Does this conclude your true-up rebuttal testimony?

8 A. Yes it does.

