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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2022-0129 / 0130

REBUTTAL TESTIMONY

OF

MARISOL E. MILLER

ON BEHALF OF

EVERGY MISSOURI METRO and EVERGY MISSOURI WEST

**Kansas City, Missouri
July 2022**

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REBUTTAL TESTIMONY

OF

MARISOL E. MILLER

Case No. ER-2022-0129 / 0130

1 **I. INTRODUCTION**

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

3 A: My name is Marisol E. Miller. My business address is 1200 Main, Kansas City, Missouri
4 64105.

5 **Q: Are you the same Marisol E. Miller who submitted direct testimony in these dockets**
6 **on January 7, 2022?**

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”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy
11 Missouri West”) (collectively, the “Company”).

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

13 A: My testimony addresses issues raised covering test year revenues and rate design/Class
14 Cost of Service. Test year revenue issues raised in the direct testimony of MPSC Staff
15 include: (1) The exclusion of rate clean up and jurisdictional alignment, (2) the exclusion
16 of an adjustment for COVID adjustment, (3) the exclusion of MEEIA demands and energy,
17 (4) the changing of the test year and the arbitrary adjustment of billing determinants, (5)

1 proposal to separate Net Metering and Parallel Generation customers and (6) misleading
2 testimony regarding the Company's response to data requested. Rate design issues raised
3 in the Direct testimony of MPSC Staff, MIEC, and MECG include: (1) the elimination of
4 certain rate codes and end use rates, (2), a proposal for an optional RTP rate, (3) the
5 application of a commission ordered increase, (4) customer charge, (5), C&I consolidation,
6 and (6) corrections to Company Direct testimony.

7 **Q: Will your testimony expect to cover all of the issues and concerns that you've**
8 **identified in the review of all Direct testimony offered in this case?**

9 A: I have not attempted to respond to every argument made by all witnesses. The fact that I
10 may not have responded to any particular argument or statement made by either any
11 witness does not indicate my agreement with that argument or statement.

12 II. TEST YEAR REVENUES

13 **Q: Did you review MPSC Staff's test year revenues filed in their Direct?**

14 A: Yes.

15 **Q: Are there differences that exist between MPSC Staff's calculated test year revenues**
16 **and the Company's?**

17 A: Yes. These differences include the exclusion of jurisdictional alignment changes, COVID
18 adjustments, the exclusion of Missouri Energy Efficiency Investment Act ("MEEIA")
19 demands and MEEIA energy savings through the True Up period, and a change in the 12-
20 month period that provides the foundational billing determinants for calculating revenues.

1 **Q: Starting with the first exclusion, the Company has proposed a number of changes to**
2 **its rates to increase rate alignment across its jurisdictions. Did MPSC Staff include**
3 **any of these changes in its test year revenues filed on June 8, 2022?**

4 A: No. In the review of MPSC Staff witness Kim Cox's testimony and associated Accounting
5 schedules and workpapers, there was no adjustment of billing determinants or resulting
6 revenues for these proposed changes intended to align jurisdictions.

7 **Q: Would the Company experience a change in expected revenues with these changes?**

8 A: Yes.

9 **Q: Does MPSC Staff acknowledge that some test year revenues should be adjusted to**
10 **reflect proposals made by the Company?**

11 A: Yes. On page 7 of Ms. Cox's Direct testimony, she explains how she plans to adjust True
12 up determinants and revenues to reflect the Company's proposal included in Direct to align
13 the summer and winter seasons in Evergy Missouri Metro.

14 **Q: Did Ms. Cox's testimony include any other planned adjustment to test year/True up**
15 **determinants or revenues reflecting jurisdictional alignment proposals made by the**
16 **Company?**

17 A: Besides the one mentioned above regarding seasonal alignment in Evergy Missouri Metro,
18 no.

19 **Q: Should the proposal for seasonal alignment be viewed any differently than any other**
20 **proposal made by the Company?**

21 A: No. If MPSC Staff agrees with the Company that changes to summer and winter seasons
22 would impact future revenues that would merit adjustment to test year

1 determinants/revenues, all other jurisdictional alignment proposals would have an
2 equivalent impact and should therefore be adjusted for and reflected in revenues as well.

3 **Q: Were there any other exclusions observed in your review of MPSC Staff's revenues?**

4 A: Yes, MPSC Staff's revenues appear to have excluded any adjustment for COVID, MEEIA
5 demands, and MEEIA energy through the True Up Period. Company witnesses Albert
6 Bass and Kimberly Winslow provide further detail in their respective rebuttal testimonies
7 on the merits of a COVID adjustment and MEEIA demand adjustment, respectively, to
8 billing determinants.

9 **Q: In addition to the exclusions discussed above, were there other differences that you
10 noted in MPSC Staff revenues?**

11 A: Yes, MPSC Staff utilized a different 12-month period for calculating revenues or 12
12 months ending December 31, 2021 instead of June 30, 2021.

13 **Q: Isn't this a typical difference found in historical rate cases?**

14 A: It's uncertain. However, historical differences have not been so pronounced and revenue
15 differences between the Company and MPSC Staff in this case necessitated further
16 investigation by the Company. The result was the understanding by the Company that
17 MPSC Staff makes much more expansive changes to the original test year and their
18 calculated revenues than was fully known to the Company. These differences might
19 explain why MPSC Staff needed more data than the Company utilized and prepared for
20 their revenues through the update, which was limited to rate switchers and stop/start
21 service.

1 **Q: Can you elaborate?**

2 A: In calculating revenues, MPSC Staff completely replaced six months of billing
3 determinants, so instead of utilizing the original test year (12 months ending June 30, 2021)
4 updated for rate switchers, etc. as the Company did, MPSC Staff replaced six months of
5 determinants or used 12 months ending December 31, 2021 and applied all new
6 adjustments, including weather normalization. The MPSC Staff methodology represents a
7 significant change to what the Company understood was MPSC Staff's historical
8 methodology for calculating revenues.

9 **Q: In Ms. Cox's preparation of adjusted revenues, was there any concern?**

10 A: The Company continues to evaluate, but in an effort to more closely align and have an
11 apples-to-apples comparison with MPSC Staff revenues, the Company has decided to re-
12 run revenues reflecting 12 months of foundational billing determinants through the update
13 period (December 31, 2021) instead of the original test year filed in Direct, updated for
14 rate switchers/growth/stop start service through the True up for the True up filing,
15 including weather normalization through December.

16 **Q: Is MPSC Staff's complete recreation of revenues necessary?**

17 A: Not necessarily. MPSC Staff could use the established test year and update for major inputs
18 of change like rate switchers/customer growth, etc. This would mirror closely to what the
19 Company does for Update and True up periods. However, the utilization of a whole new
20 12-month period by MPSC Staff essentially requires the Company to also completely
21 recreate revenues since comparing revenues from 2 different 12-month periods with a
22 different set of adjustments would be an "apples to oranges" comparison and completely
23 nullifies the Company's Direct filing.

1 **Q: Was changing of the foundational determinants using a whole new period or calendar**
2 **year ending December 31, 2021 the only major difference or concern observed by the**
3 **Company?**

4 A: As mentioned earlier, the Company continues to evaluate and has noted several differences
5 in revenues including the change in base determinants noted above and the exclusion of
6 certain adjustments also noted above, but additionally, based on Ms. Cox's Direct
7 testimony, she describes adjustment for customer growth on pages 6-7 where it seems that
8 ordinarily, MPSC Staff would utilize December customer counts as a basis for changes in
9 customer growth in their calculation of revenues. However, it appears that in this case,
10 because customer growth was observed to drop in December, which would decrease
11 expected revenues, MPSC Staff chose to utilize a November customer count instead. It's
12 unclear why November was viewed as more accurate than December, but absent any
13 reasoning provided by MPSC Staff, it appears subjective minimally or arbitrary at worst,
14 to the extent that November was chosen simply to ignore the possible drop in sales
15 experienced by the Company and lower expected sales going forward. Ms. Cox asserts in
16 Direct testimony that she will be updating for customer growth in the True up, so it should
17 be clear then if customer growth through May is used and whatever adjustment used/not
18 used by MPSC Staff is appropriate and the reasoning clearly explained in the True up
19 testimony by MPSC Staff.

1 **Q: Ms. Cox further suggests NM/PG customers be separated out onto their own rate**
2 **codes. This was also suggested by MPSC Staff witness, Sarah Lange. Are there any**
3 **concerns with this suggestion?**

4 A: The Company agrees with the general desire to have consistency in the reporting of net
5 metered and/or parallel generation customers. To enable such reporting requires
6 reconfiguration of the billing system which requires technical resources, time, and testing
7 to minimize the chance of negative customer impact. This is mentioned to clarify that any
8 change would not be immediate. Should the Company be ordered to make this change, it
9 would require adequate time be given beyond the effective date of rates to implement as
10 seamlessly as possible.

11 **Q: Was there anything else that was needing to be clarified regarding revenues?**

12 A: Yes. On page 7 of MPSC Staff witness Ms. Michelle Bocklage's Direct testimony, she
13 offers testimony alleging that the Company did not provide requested individual Large
14 Power customer data for the update period. This is inaccurate. The Company agrees that
15 phone conversations were had with MPSC Staff to better understand the data being
16 requested. It was made clear by MPSC Staff that they were not simply requesting available
17 data, but requesting that the Company recreate analysis that took months to prepare, to
18 assist MPSC Staff with their own analysis. Unfortunately, as fully explained through DR¹,
19 the Company's analysis/direct filing takes extensive time to prepare and is not something
20 that can be turned around quickly for the MPSC Staff. The Company did offer to work
21 with their IT department to complete a data pull from the system, but clarified that the data
22 would not be identical to the analysis prepared by the Company in Direct. The MPSC Staff

¹ Data Requests 0412 and 0403 provided on 5/17/22 and 5/16/22.

1 did not express interest in exploring this option, presumably because it was not the analysis
2 that the Company performed refreshed for MPSC Staff use. However, after additional
3 inquiry by MPSC Staff, the Company initiated a data pull from the IT department to
4 provide the Large Power data to MPSC Staff and this was provided on May 3 and should
5 have allowed time to incorporate into their analysis.²

6 III. RATE DESIGN & CLASS COST OF SERVICE (CCOS)

7 **Q: Does what follows fully capture all issues raised regarding rate design and the CCOS?**

8 A: No. Multiple Company witnesses offer testimony regarding rate design and CCOS.
9 Company witnesses Bradley Lutz (data requirements and CCOS robustness/precision),
10 Kimberly Winslow (Time of Use (TOU), Charles Caisley (TOU) and Craig Brown
11 (specific CCOS items) will also offer testimony in response to Rate Design and CCOS.

12 **Q: What is your response to MPSC Staff's proposal to eliminate end use distinctions in
13 the rate codes utilized by the Company and duplicative rate codes in general?**

14 A: While the Company doesn't necessarily agree with the specific recommended rate codes
15 outlined by MPSC Staff as they are overly prescriptive, the direction and the spirit of the
16 suggestions are very closely aligned with the Company's plan as well. First, the Company
17 has included in their Rate Plan, objectives that would eliminate end use rates. As part of
18 these efforts, the Company has cleaned up and proposed the elimination of many old rate
19 codes-much of which was included in the Direct Filing. Given the Company's Direct filing
20 and on-going plans to continue clean up and rate alignment where/when possible, the
21 Company recommends the Commission allow the Company to forge ahead with these/their

² Data requests 274S and 278S provided on 5/3/2022.

1 own efforts since they appear to generally align with MPSC Staff's objectives to remove
2 duplicative rate codes and eliminate end use rates/distinctions.

3 **Q: MPSC Staff recommends an optional Real Time Pricing ("RTP") rate in their**
4 **testimony. What is your response to their proposal?**

5 A: While the Company appreciates MPSC Staff's detailed opinion on RTP, MPSC Staff
6 appears to ignore one of the fundamental requirements outlined in the 2018 rate case
7 Stipulation & Agreement and that was that any RTP proposal needed to be able to work
8 with the Company's Billing system. MPSC Staff's proposal appears to largely mirror the
9 existing Commercial & Industrial ("C&I") rate structures but with added complexity (FAC
10 adder, a demand charge with seemingly arbitrary established peak time, etc.) and includes
11 rather significant implementation hurdles like a required one-on-one consultation with
12 regular refresher and a complicated Day-Ahead Locational Marginal Price requirement that
13 includes interplay with customer average hourly load, etc., neither of which considers
14 available resources or the likely extensive system programming/reconfiguration that would
15 be required to implement successfully-unless MPSC Staff is expecting continued manual
16 billing.

17 Instead, the Company recommends that the Commission approve the Company's
18 proposal of the Time Related Pricing ("TRP") rate. As outlined in the Direct testimony of
19 Company witness, Bradley Lutz, the Company worked with its existing RTP customers to
20 consider their feedback in designing a new rate. When it became clear that customers were
21 largely participating on an RTP rate based on overall bill amount rather than leveraging
22 fluctuations in the market and modifying operations as a result, the Company partnered
23 with Concentric Energy Advisors ("Concentric") to design a rate that considered various

1 approaches across the industry, could work with the Company's billing system to avoid
2 manual billing, and sent the appropriate price signals to customers. The Company
3 continues to believe that the TRP rate provides the best solution/rate that provides the
4 appropriate price signal to our customers, considers their feedback/flexibility, and that can
5 be implemented in a way that works with our billing system.

6 **Q: Did the Company review MPSC Staff's recommendation regarding revenue**
7 **allocation and revenue responsibility shifts?**

8 A: Yes. In the spirit of gradualism and to minimize the significant impact to certain
9 customers, should the Commission approve a rate increase less than what was proposed
10 by the Company, we would seek to maintain the revenue allocations and rate element
11 changes recommended in the Direct filing.

12 **Q: Were there any specific concerns regarding revenue allocation recommendations**
13 **made by MPSC Staff?**

14 A: Staff makes specific rate increase recommendations for the Large Power Class.
15 Depending on a number of factors including the approved fuel costs granted in the
16 Fuel Adjustment Clause ("FAC") filing, as well as, the specific rate increase approved in
17 this rate case, Missouri Senate Bill 564 legislation needs to be considered. Key language
18 from Senate Bill 564 is as follows:

19 *...if the difference between the electrical corporation's class average overall*
20 *rate while this section applies to the electrical corporation, and the class*
21 *average overall rate of the date new rates is set in the corporation's most*
22 *recently completed general rate proceeding completed prior to the*
23 *electrical corporation electing to make such deferrals, reflects a growth*
24 *rate of more than 2% for the large power service rate class, such increase*
25 *shall be limited to 2%, with such reduced revenues arising from limiting the*
26 *large power service rate class to be allocated to all other customers."*

1 **Q: MPSC Staff is further recommending a Residential Customer Charge that appears**
2 **to largely ignores customer related cost increases experienced by the Company. Are**
3 **there concerns with this recommendation?**

4 A: Yes. Based on the Direct testimony of MPSC Staff, there seemed to be struggles producing
5 a reliable CCOS study on their end without extreme levels of granular data that does not
6 exist. This is fully addressed in the Rebuttal testimony of Company witness Mr. Bradley
7 Lutz, but it appears that without the onerous detail requested by MPSC Staff, there was no
8 acknowledgement of the existence of customer costs that were not directly assigned or
9 directly allocated (indirectly allocated customer costs). Customer costs considered
10 “indirectly allocated” do not seem to be considered in MPSC Staff’s proposed customer
11 charge. The lack of full acknowledgement of customer costs is unreasonable and a
12 complete departure to historical and generally accepted utilization of allocation of costs by
13 the Company and even by MPSC Staff.

14 **Q: What do you mean?**

15 A: Evergy, like other Missouri regulated utilities and regulated utilities across the country,
16 have long used cost allocation methods outlined in The National Association of Regulatory
17 Utility Commissioners (“NARUC”) Electric Utility Cost Allocation Manual. Utilization
18 of the NARUC manual is largely considered the industry standard. Not only has the
19 Company utilized the NARUC manual as the reference to help guide CCOS studies,
20 its/NARUC’s utilization of and recommendations supporting allocation of costs (rather
21 than just direct cost assignment) has also been utilized by MPSC Staff for several rate
22 cases.

1 **Q: Can you elaborate on MPSC Staff’s specific utilization and acceptance of cost**
2 **allocations to calculate and recommend a customer charge?**

3 A: Yes. In the Company’s last general rate case³, MPSC listed the following customer
4 accounts/costs be included for recovery through the customer charge, which included the
5 utilization of allocated costs:

- 6 ▪ *Distribution – services (investment and expenses)*
- 7 ▪ *Distribution – meters (investment and expenses)*
- 8 ▪ *Distribution – customer installations*
- 9 ▪ *Customer deposit*
- 10 ▪ *Customer meter reading*
- 11 ▪ *Other customer billing expenses*
- 12 ▪ *Uncollectible accounts (write-offs)*
- 13 ▪ *Customer service & information expenses*
- 14 ▪ *Sales expense*
- 15 ▪ *Portion of income taxes*

16 **Q: Is this the only time that MPSC Staff utilized and relied on allocated costs to**
17 **recommend a customer charge?**

18 A: No. The Company did a cursory review of recent rate cases and found that MPSC Staff
19 utilized and relied on allocated costs to recommend a customer charge in at least the last 5
20 rate cases alone⁴, but expects that the reliance/utilization of allocated customer costs goes
21 back much further than that. It was further observed that Staff not only utilized allocated
22 costs in their customer charge proposals, but also often the same allocators used by the
23 Company.⁵

³ Docket: ER-2018-0145, page 42 of MPSC Staff’s Class Cost of Service Report filed on July 6, 2018

⁴ ER-2018-0146, ER-2018-0145, ER-2016-0285, ER-2016-0156, ER-2014-0370.

⁵ ER-2016-0285 CCOS report pg. 34 and ER-2014-0370 CCOS report pg. 35.

1 **Q: Did the Company’s proposal for the Residential customer charge in this rate case**
2 **proceeding include the same cost accounts as listed above, that include allocated**
3 **costs?**

4 A: Yes. Given this long history acknowledging full customer costs (even allocated ones), as
5 well as, the allocators used by the Company, it’s perplexing to hear Staff needing to create
6 a new allocator to allocate customer costs. When comparing Staff’s customer costs of
7 \$30.2M for Evergy Missouri Metro and an overall customer charge recommendation of
8 \$10 and the Company’s customer costs of \$54.6M for Evergy Missouri Metro and \$75.7M
9 for Evergy Missouri West with a recommendation of \$16, the difference is stark. While a
10 portion of that could be driven by differences in rate increase, etc., the significance in the
11 difference points to material omission by Staff in this rate case. When the Company
12 reviewed the 2018 rate cases and the Staff’s recommended customer charges of \$12.82 for
13 Evergy Missouri Metro and \$12.38 for Evergy Missouri West, which are higher than the
14 current 2022 recommendation of MPSC Staff of \$10, it is particularly unexpected because
15 it would not be reasonable to assume that customer/fixed costs have gone down since 2018.
16 It would appear that Staff has changed their approach significantly. Any change in
17 approach that results in a reduction of customer costs that substantial and changes the
18 consistency to historical results should raise questions and potential concern regarding the
19 reliability of data/recommendation. The Company's concerns over the reliability of Staff's
20 recommendation were even greater in Evergy Missouri West given the lack of supporting
21 data provided. Unlike in Evergy Missouri Metro, Staff did not provide the Company with
22 analysis to support their \$10 customer charge recommendation in Evergy Missouri West.

1 **Q: Given Staff’s exclusion of substantial customer costs in their customer charge**
2 **calculation, what is the Company recommendation regarding the customer charge?**

3 A: The Company recommends that the Commission approve the Company’s recommendation
4 for a customer charge of \$16 that aligns with historical methods that fully capture costs and
5 consider cross jurisdictional alignment.

6 **Q: Lastly, MPSC Staff offered specific recommendations for the C&I classes, what are**
7 **they?**

8 A: Staff recommends that all C&I classes (with the exception of RTP, Nucor, etc.) incorporate
9 TOU elements similar to the recommendations made for the Residential class.
10 Specifically, a discount for the summer super off peak period and a premium for the
11 summer off peak period.

12 **Q: Before delving into specific concerns, what has the Company done to create a plan**
13 **that has guided all rate recommendations made in this rate case?**

14 A: The Company has created a Rate Plan that encapsulates key rate objectives.

15 **▪ Rate Plan**

16 The Company's Rate Plan strives towards key rate design objectives which include,
17 but are not limited to, cross jurisdictional alignment, rate simplification, and developing
18 meaningful price signals. The Rate Plan is part of a broader strategy by the Company that
19 considers customer choice and customer satisfaction and other goals. This Plan serves as
20 the framework by which the Company is basing all rate proposals.

21 To provide meaningful data and analysis to support rate proposals, the Company
22 has also performed a number of studies that support all recommendations made in the
23 Company’s Direct filing. They include:

1 ▪ **A Consolidation Study**

2 As explained in the Direct Testimony of Company witness, Bradley Lutz, the Company
3 completed a Consolidation Study to evaluate consolidating the Evergy Missouri Metro and
4 Evergy Missouri West rates. The objective of the study was to outline the current state of
5 operations, costs, and rates, as well as the potential obstacles with immediate rate
6 consolidation given the current state, and finally, the steps recommended to consolidate
7 rates properly (leveraging past learnings) with a possible execution timeline. Given the
8 broad reaching impact to all customers, the results included a plan that outlined important
9 considerations to the consolidation of rates, including specific steps that would need to be
10 performed (and in what sequence/timing) to provide the most seamless transition possible.
11 Several recommendations outlined were proposed and included in the Company's Direct
12 filing including: the elimination of outdated/frozen rates and the elimination of most end-
13 use rates. Additionally, in consideration of cross jurisdictional alignment, the Company
14 included in Direct Testimony an Hours Use plan to redesign the energy charge calculation,
15 a plan to incorporate demand thresholds for all C&I customers (referred to as Bright Lines),
16 and a TRP proposal that incorporates time related elements to the energy charge
17 calculation. The Consolidation study and plan is important because it considers the cross
18 jurisdictional impacts and implementation considerations, where the Company has
19 included cross functional experts in the Company to determine ideal timing and what's
20 feasible to minimize operational impact/costs. The Consolidation was filed on October 30,
21 2020 and no stakeholder comments were offered or filed.

1 ▪ **Hours Use Study**

2 The Company worked with consultant, Concentric Energy Advisors to review the current
3 calculation of the energy charge for C&I customers. Since changes will be guided by the
4 CCOS and cost causation and continuing operational differences across companies will
5 continue to be evaluated and eliminated, the potential bill impacts for the changes could be
6 expansive for some customers. As such, the Company plans to adopt a multi-step
7 implementation plan to help mitigate the potential impacts over time. The Company hopes
8 to collect feedback in this rate case to help refine the plan. Time elements like those
9 included in the TRP rate are also a consideration, once we see how customers react
10 (participate) in the TRP rate and what feedback they might offer.

11 ▪ **Bright Lines Study**

12 With cross jurisdictional alignment in mind, the Company is planning to establish demand
13 thresholds to better define each C&I class in a future case. Bright Lines will have the
14 benefit of minimizing rate switchers and better group like customers based on demands.
15 With customers better delineated into their appropriate classes, stability in the rate classes
16 will allow for better class analysis (and impacts) so as the Company makes greater progress
17 in implementing different components of their overall plan, we can provide greater
18 certainty regarding impacts.

19 ▪ **TRP Study**

20 The Company worked with consulting firm, Concentric Energy Advisors, to design a rate
21 option that leveraged real world examples in the industry, offered price signals that aligned
22 with market pricing (time-based elements), and that worked with Evergy's billing system.
23 The results of that effort, including a TRP rate was filed in in the Direct filing. The TRP

1 rate considers what's happening across the industry, customer feedback, and can work with
2 Evergy's billing system to avoid manual billing.

3 **Q: Why is it important to consider the Rate Plan and all of the various studies**
4 **performed by the Company?**

5 A: It is important because, collectively, the Rate Plan and the studies considered the customer,
6 the industry, and full customer rate impacts in its design, to make sure that the collective
7 changes in total harmonized in a manner to minimize customer disruption by allowing full
8 understanding of not just customer billing impacts, but operational and implementation
9 impacts to the Company to ensure it could all actually be done efficiently and effectively.

10 **Q: Given the careful coordination and planning that the Company has performed to**
11 **minimize customer disruption and avoid negatively impacting customer satisfaction,**
12 **what are the concerns with MPSC Staff's recommendation?**

13 A: There are several concerns. First and most important, Staff appears to be eliminating
14 customer choice with its recommendation to force all C&I customers on a rate (or to accept
15 mandatory time elements on the standard rate) they may not want and that may
16 significantly impact them in the long run. Secondly, Staff's recommendation does not
17 appear to have considered jurisdictional differences across the Missouri and Kansas
18 jurisdictions. Thirdly, there does not appear to have been comprehensive analysis that
19 would fully outline the customer/revenue impacts of the collective recommendations of
20 Staff (collective recommendations and the resulting change in pricing using total actual bill
21 determinants and the resulting bill and revenue impacts that are not just estimates based on
22 some assumed usage). Lastly, the Company is unaware that Staff confirmed the
23 implementation feasibility (and cost) of any of the recommendations.

1 For more details on the Company's position on the importance of customer choice,
2 please see the Direct and Rebuttal testimonies of Company witnesses Charles Caisley and
3 Kimberly Winslow.

4 **Q: Why do you believe the Company's approach and rate recommendations for C&I,**
5 **specifically, the TRP rate, should be preferred over MPSC Staff's?**

6 A: The Company's TRP rate is similar to Staff's proposal, but the Company's
7 recommendation maintains customer choice, considers customer feedback, cost causation,
8 customer impact, operational and implementation impact and includes time-based elements
9 important to sending the appropriate price signals. If successful/well received, the
10 Company plans to continue to evaluate how to incorporate into the broader plan that could
11 lead to introducing TOU elements in the standard rates in the future.

12 **Q: Did you review MIECs Direct testimony?**

13 A: Yes. MIEC appears to largely agree and support the Company Large Power and Large
14 General Service class proposals outlined in Direct testimony. MIEC did offer a
15 suggestion for how to apply the rate increase should the rate increase be less than what the
16 Company proposed. The Company appreciates MIEC's testimony, but reiterates the
17 Company's original proposals offered in Direct testimony regarding application of the rate
18 increase.

19 **Q: MECG's Direct testimony covers various topics. What items are you addressing?**

20 A: MECG provides testimony regarding the CCOS Study, the importance of competitive
21 rates, and rate design and revenue allocation. I will be addressing comments regarding rate
22 design and revenue allocation. Company witness Craig Brown from 1898 will address

1 testimony regarding CCOS and Company witness Darrin Ives will cover testimony
2 regarding the importance of competitive rates.

3 **Q: MECG makes several recommendations for the application reflecting changes to**
4 **revenue requirement and class revenue allocation overall. Do you agree with the**
5 **recommendations?**

6 A: The Company appreciates MECG's proposals. The Company agrees with MECG
7 regarding the importance of equity and cost causation in establishing rates. However, as
8 long established in historical testimony, the Company considers all Bonbright
9 principles in designing rates, but also acknowledges that multiple other factors and policy
10 considerations, etc. must also be considered.

11 **Q: Do you agree with MECG's revenue allocation proposals and changes to rate**
12 **elements?**

13 A: In the spirit of gradualism and to minimize the significant impact to certain customers,
14 should the Commission approve a rate increase less than what was proposed by the
15 Company, we would seek to maintain the revenue allocations and rate element changes
16 recommended in the Direct filing.

17 **Q: MECG provides feedback regarding the future Hours Use change and proposal. Do**
18 **you have concerns about the suggestions?**

19 A: The Company appreciates MECG feedback. It was the hope that this docket could serve
20 to collect feedback that the Company can consider as it continues to refine proposals that
21 will be filed in future rate cases. MECG provides thoughts on how energy and demand
22 charges can be priced to send appropriate price signals to customers regarding fixed and
23 variable costs. The Company will consider this feedback (and all other feedback received

1 through this docket) and use it to refine its future proposal for modifying the design of the
2 energy charge/Hours Use. Since the Company plans to fully leverage the CCOS study in
3 its design and will strive to align cost causation and the resulting pricing/design, it
4 expects that MECG's feedback will align very well.

5 **Q: Did the Company find errors in the Direct filing that you wanted to correct now?**

6 A: Yes. As part of my direct testimony in this case, I submitted a proposal for a TRP tariff,
7 to replace the existing RTP tariff. The proposed pricing for this new tariff was determined
8 using the functionalized costs within the current Class Cost of Service study, but for the
9 initial submission, a draft was used instead of the final version. Thus, I am now submitting
10 corrections to the TRP tariff. The hourly pricing for TRP has been refreshed to reflect the
11 finalized Class Cost of Service study, such that the pricing be fully reflective of the
12 appropriate costs to serve these customers. Please see Schedule MEM-7 for the new tariff
13 Time-Related Pricing for Evergy Missouri Metro & Schedule MEM-8 for the new tariff
14 Time-Related Pricing for Evergy Missouri West.

15 **Q: Does that conclude your testimony?**

16 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)

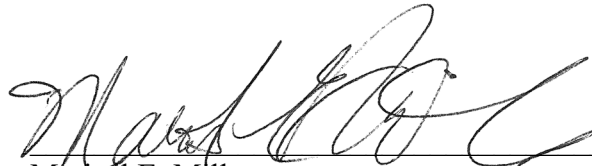
In the Matter of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West’s Request for Authority to) Case No. ER-2022-0130
Implement A General Rate Increase for Electric)
Service)

AFFIDAVIT OF MARISOL E. MILLER

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

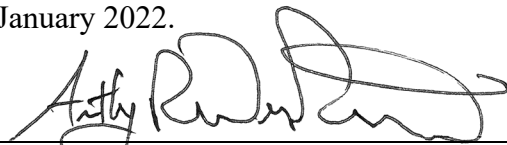
Marisol E. Miller, being first duly sworn on his oath, states:

1. My name is Marisol E. Miller. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Senior Manager – Regulatory Affairs.
2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of Evergy Missouri Metro and Evergy Missouri West consisting of twenty (20) 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.



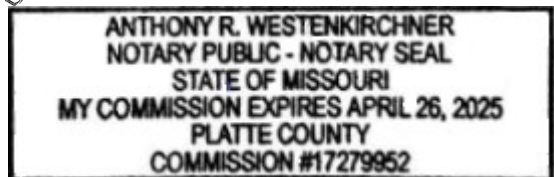
Marisol E. Miller

Subscribed and sworn before me this 13th day of January 2022.



Notary Public

My commission expires: 4/26/2025



EVERGY METRO, INC. d/b/a EVERGY MISSOURI METRO

P.S.C. MO. No. 7 1st Revised Sheet No. 12
Canceling P.S.C. MO. No. 7 Original Sheet No. 12
For Missouri Retail Service Area

LIMITED TIME-RELATED PRICING SERVICE
Schedule TRP

PURPOSE

Time-Related Pricing (TRP) offers customers energy pricing that is time differentiated and based on historical locational marginal prices from the Market. This rate allows customers the ability to respond to pricing reflective of the hourly cost of energy and associated demand costs. Customers benefit from having visibility to hourly pricing for predefined periods.

AVAILABILITY

This schedule is available to customers for electric service through one meter with an average capacity of at least one hundred and fifty (150) kilowatts (kW) over the past twelve months, and for purposes other than those included in the availability provisions of the Residential Service Rate Schedule. At the Company’s discretion, service may be provided through more than one meter where it is economical for the Company to do so. The Company reserves the right to determine the applicability or the availability of this price schedule to any specific applicant for electric service who meets the above criteria.

This rate is not available for standby, breakdown, supplementary, maintenance, auxiliary, or resale service.

Participation in TRP is limited to 100 customers.

CHARACTER OF SERVICE

Single-phase, 60 Hertz, nominally 120/240 volt firm electric service, provided from the Company’s secondary distribution system. Three-phase secondary service shall be available where three-phase facilities are available without additional construction or may be made available at additional charge at voltages not exceeding 480 volts. Three-phase primary distribution service shall be available where primary distribution facilities are available without additional construction or may be made available at additional charge at 2,400, 12,470, or 24,900 nominal volts. Primary service may be served from Company’s 69,000 volt or 34,500 volt systems, at Company’s option, through Company owned transformation. The customer may request contractual service from the 69,000 volt or 34,500 volt systems, if such systems are available at the customer’s point of delivery without additional construction and the customer provides transformation.

BILL DETERMINATION

A TRP Bill is rendered after each monthly billing period and calculated using the following formula:

$$\text{TRP Bill} = \text{Customer Charge} + (\text{Facilities Charge} * \text{kW of Facilities Demand}) + ((\text{Hourly Energy Charge}^{\text{ec}} * \text{Hourly kWh})_{\text{For all hours of the billing month}})$$

^{ec} = Energy Charge varies by season, day-type, and hour. See following tables.

CUSTOMER CHARGE: General Load at Secondary and Primary Voltage

0-999 kW in Facilities Demand	\$125.12
1000 kW or above in Facilities Demand	\$1,068.21
Power Load at Secondary, Primary, Substation, and Transmission Voltage	\$1,210.14

FACILITIES CHARGE:

General Load at Secondary Voltage	\$3.579 per kW of Facilities Demand
General Load at Primary Voltage	\$2.967 per kW of Facilities Demand
Power Load at Secondary Voltage	\$4.053 per kW of Facilities Demand
Power Load at Primary Voltage	\$3.359 per kW of Facilities Demand
Power Load at Substation Voltage	\$1.014 per kW of Facilities Demand
Power Load at Transmission Voltage	\$0.000 per kW of Facilities Demand

Issued: January 7, 2022
Issued by: Darrin R. Ives, Vice President

Effective: February 6, 2022
1200 Main, Kansas City, MO 64105

EVERGY METRO, INC. d/b/a EVERGY MISSOURI METRO

P.S.C. MO. No. 7

Original Sheet No. 12A

Canceling P.S.C. MO. No. _____

Revised Sheet No. _____

For Missouri Retail Service Area

LIMITED TIME-RELATED PRICING SERVICE
Schedule TRP

ENERGY CHARGE: The energy charge is calculated based on kWh used during the billing period multiplied by that hour's pricing. The hourly TRP energy pricing reflects time-variable energy and demand costs into static hourly pricing.

Hourly TRP Pricing of Energy per hour, day-type, and season is as follows:

GENERAL LOAD:

Hour Ending	Summer Weekday	Winter Weekday	Summer Weekend	Winter Weekend
1	\$0.04944	\$0.05773	\$0.04729	\$0.06323
2	\$0.04715	\$0.05625	\$0.04566	\$0.06149
3	\$0.04605	\$0.05606	\$0.04466	\$0.05984
4	\$0.04565	\$0.05656	\$0.04422	\$0.06028
5	\$0.04733	\$0.05961	\$0.04466	\$0.06250
6	\$0.05083	\$0.06645	\$0.04600	\$0.06595
7	\$0.05443	\$0.07947	\$0.04712	\$0.06983
8	\$0.05659	\$0.08108	\$0.04944	\$0.07513
9	\$0.05989	\$0.07947	\$0.05195	\$0.08134
10	\$0.06171	\$0.08136	\$0.05347	\$0.08634
11	\$0.06532	\$0.07830	\$0.05537	\$0.08364
12	\$0.07050	\$0.07564	\$0.05875	\$0.07978
13	\$0.07527	\$0.07370	\$0.06208	\$0.07708
14	\$0.11449	\$0.07309	\$0.06466	\$0.07497
15	\$0.16646	\$0.07114	\$0.09720	\$0.07433
16	\$0.24504	\$0.07041	\$0.10102	\$0.07458
17	\$0.30699	\$0.07279	\$0.10343	\$0.07749
18	\$0.28230	\$0.07845	\$0.10084	\$0.08547
19	\$0.19505	\$0.07950	\$0.09570	\$0.08624
20	\$0.15062	\$0.07753	\$0.09168	\$0.08419
21	\$0.09087	\$0.07639	\$0.05510	\$0.08127
22	\$0.05916	\$0.06909	\$0.05270	\$0.07417
23	\$0.05455	\$0.06326	\$0.04957	\$0.06803
24	\$0.05111	\$0.05780	\$0.04722	\$0.06201

EVERGY METRO, INC. d/b/a EVERGY MISSOURI METRO

P.S.C. MO. No. 7

Original Sheet No. 12B

Canceling P.S.C. MO. No. _____

Revised Sheet No. _____

For Missouri Retail Service Area

LIMITED TIME-RELATED PRICING SERVICE
Schedule TRP

ENERGY CHARGE (cont'd):

POWER LOAD:

Hour Ending	Summer Weekday	Winter Weekday	Summer Weekend	Winter Weekend
1	\$0.04973	\$0.05338	\$0.04521	\$0.05548
2	\$0.04698	\$0.05202	\$0.04351	\$0.05406
3	\$0.04566	\$0.05184	\$0.04247	\$0.05271
4	\$0.04518	\$0.05230	\$0.04202	\$0.05306
5	\$0.04720	\$0.05512	\$0.04247	\$0.05488
6	\$0.05139	\$0.06144	\$0.04387	\$0.05771
7	\$0.05570	\$0.07347	\$0.04504	\$0.06089
8	\$0.05828	\$0.07496	\$0.04745	\$0.06522
9	\$0.06224	\$0.07347	\$0.05007	\$0.07030
10	\$0.06441	\$0.07522	\$0.05166	\$0.07440
11	\$0.06874	\$0.07239	\$0.05363	\$0.07219
12	\$0.07494	\$0.06993	\$0.05716	\$0.06903
13	\$0.08065	\$0.06814	\$0.06063	\$0.06682
14	\$0.09757	\$0.06757	\$0.06332	\$0.06509
15	\$0.11891	\$0.06577	\$0.07319	\$0.06457
16	\$0.15010	\$0.06510	\$0.07653	\$0.06477
17	\$0.16711	\$0.06730	\$0.07833	\$0.06715
18	\$0.15070	\$0.07253	\$0.07519	\$0.07369
19	\$0.11453	\$0.07350	\$0.06956	\$0.07432
20	\$0.09599	\$0.07168	\$0.06542	\$0.07264
21	\$0.07405	\$0.07062	\$0.05335	\$0.07025
22	\$0.06136	\$0.06388	\$0.05085	\$0.06444
23	\$0.05585	\$0.05850	\$0.04759	\$0.05941
24	\$0.05173	\$0.05345	\$0.04514	\$0.05448

LOAD DISTINCTIONS

Customers with maximum demand of 1000 kW or above shall be considered Power Load customers for the purposes of this tariff. All customers meeting the minimum capacity requirements of this tariff, but with maximum demands below 1000 kW, shall be considered General Load customers for the purposes of this tariff.

Issued: January 7, 2022
Issued by: Darrin R. Ives, Vice President

Effective: February 6, 2022
1200 Main, Kansas City, MO 64105

EVERGY METRO, INC. d/b/a EVERGY MISSOURI METRO

P.S.C. MO. No. 7

Original Sheet No. 12C

Canceling P.S.C. MO. No. _____

Revised Sheet No. _____

For Missouri Retail Service Area

LIMITED TIME-RELATED PRICING SERVICE
Schedule TRP

SUMMER AND WINTER BILLING PERIOD

For determination of Seasonal periods, the four (4) summer months shall be defined as the four (4) monthly billing periods of June through September. The eight (8) winter months shall be defined as the eight (8) monthly billing periods of October through May.

MINIMUM MONTHLY BILL

The Minimum Monthly Bill shall be equal to the sum of the Customer Charge and Facilities Charge.

DETERMINATION OF DEMANDS

Demand will be determined by demand instruments or, at the Company's option, by demand tests. The Actual Demand shall be the maximum thirty (30) minute demand, measured in kW during the current billing period.

MINIMUM DEMAND:

- 200 kW for General Load service at Secondary Voltage
- 204 kW for General Load service at Primary Voltage
- 980 kW for Power Load service at Secondary Voltage
- 1000 kW for Power Load service at Primary Voltage
- 1008 kW for Power Load service at Substation Voltage
- 1016 kW for Power Load service at Transmission Voltage

FACILITIES DEMAND:

Facilities Demand shall be equal to the higher of: (a) the highest Monthly Maximum Demand occurring in the last twelve (12) months including the current month or (b) the Minimum Demand.

DEMAND SIDE INVESTMENT MECHANISM RIDER

Subject to Schedule DSIM and Rules and Regulations filed with the State Regulatory Commission (Section 8.09, Sheet 1.28)

FUEL ADJUSTMENT

Fuel Adjustment Clause, Schedule FAC, shall be applicable to all customer billings under this schedule.

TAX ADJUSTMENT

Tax Adjustment Schedule TA shall be applicable to all customer billings under this schedule.

REGULATION

Subject to Rules and Regulations filed with the Missouri Public Service Commission.

Issued: January 7, 2022
Issued by: Darrin R. Ives, Vice President

Effective: February 6, 2022
1200 Main, Kansas City, MO 64105

EVERGY MISSOURI WEST, INC. d/b/a EVERGY MISSOURI WEST

P.S.C. MO. No. 1 Original Sheet No. 164.1

Canceling P.S.C. MO. No. _____ Sheet No. _____

For Missouri Retail Service Area

**LIMITED TIME-RELATED PRICING (TRP) SERVICE
ELECTRIC**

ENERGY CHARGE: The energy charge is calculated based on kWh used during the billing period multiplied by that hour's pricing. The hourly TRP energy pricing reflects time-variable energy and demand costs into static hourly pricing.

Hourly TRP Pricing of Energy per hour, day-type, and season is as follows:

GENERAL LOAD:

Hour Ending	Summer Weekday	Winter Weekday	Summer Weekend	Winter Weekend
1	\$0.04273	\$0.04993	\$0.04253	\$0.05930
2	\$0.03935	\$0.04790	\$0.03985	\$0.05693
3	\$0.03770	\$0.04771	\$0.03800	\$0.05486
4	\$0.03707	\$0.04821	\$0.03723	\$0.05540
5	\$0.03946	\$0.05183	\$0.03794	\$0.05830
6	\$0.04450	\$0.06052	\$0.04020	\$0.06291
7	\$0.04970	\$0.07584	\$0.04205	\$0.06787
8	\$0.05283	\$0.07795	\$0.04597	\$0.07448
9	\$0.05768	\$0.07625	\$0.05025	\$0.08187
10	\$0.06029	\$0.07899	\$0.05287	\$0.08827
11	\$0.06556	\$0.07545	\$0.05611	\$0.08425
12	\$0.07260	\$0.07160	\$0.06183	\$0.07946
13	\$0.07869	\$0.06934	\$0.06729	\$0.07634
14	\$0.09707	\$0.06861	\$0.07132	\$0.07401
15	\$0.12024	\$0.06662	\$0.08626	\$0.07320
16	\$0.15514	\$0.06551	\$0.09137	\$0.07352
17	\$0.17491	\$0.06795	\$0.09413	\$0.07693
18	\$0.16060	\$0.07474	\$0.08936	\$0.08616
19	\$0.12056	\$0.07604	\$0.08108	\$0.08779
20	\$0.09950	\$0.07427	\$0.07491	\$0.08535
21	\$0.07264	\$0.07250	\$0.05576	\$0.08176
22	\$0.05662	\$0.06365	\$0.05158	\$0.07311
23	\$0.05027	\$0.05702	\$0.04639	\$0.06537
24	\$0.04516	\$0.04992	\$0.04244	\$0.05761

EVERGY MISSOURI WEST, INC. d/b/a EVERGY MISSOURI WEST

P.S.C. MO. No. 1 **Original Sheet No.** 164.3
Canceling P.S.C. MO. No. **Sheet No.**

For Missouri Retail Service Area

LIMITED TIME-RELATED PRICING (TRP) SERVICE ELECTRIC
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LOAD DISTINCTIONS

Customers with maximum demand of 1000 kW or above shall be considered Power Load customers for the purposes of this tariff. All customers meeting the minimum capacity requirements of this tariff, but with maximum demands below 1000 kW shall be considered General Load customers for the purposes of this tariff.

SUMMER AND WINTER BILLING PERIOD

For determination of Seasonal periods, the four (4) summer months shall be defined as the four (4) monthly billing periods of June through September. The eight (8) winter months shall be defined as the eight (8) monthly billing periods of October through May.

DETERMINATION OF DEMANDS

Demand will be determined by demand instruments or, at the Company's option, by demand tests. The Actual Demand shall be the maximum fifteen (15) minute demand, measured in kW during the current billing period.

MINIMUM DEMAND

150 kW for all voltage levels of General Load service
500 kW for all voltage levels of Power Load service

MINIMUM MONTHLY BILL

The Minimum Monthly Bill shall be equal to the sum of the Customer Charge and any applicable minimum Facilities Charge.

FACILITIES DEMAND

Facilities Demand shall be equal to the higher of: (a) the highest Monthly Maximum Demand occurring in the last twelve (12) months including the current month or (b) the Minimum Demand. If there are less than eleven (11) previous billing periods, the determination will be made using all available previous billing periods. The Facilities Demand is defined as the Maximum Actual Demand as determined from the comparison but in no case less than one hundred and fifty (150) kW for General Load Facilities Demand Charge billing purposes, and no less than five hundred (500) kW for Power Load Facilities Demand Charge billing purposes.

MEEIA TRUE-UP, PRUDENCE REVIEW, AND MEEIA OPT-OUT PROVISIONS

See Company DSIM Rider (Sheet Nos. R-138.09, 138.12, and 138.16).

ADJUSTMENTS AND SURCHARGES

The rates hereunder are subject to adjustment as provided in the following schedules:

- Fuel Adjustment Clause (FAC)
- Renewable Energy Standard Rate Adjustment Mechanism Rider (RESRAM)
- Demand-Side Investment Mechanism Rider (DSIM)
- Tax and License Rider

REGULATIONS

Subject to Rules and Regulations filed with the State Regulatory Commission.