

Exhibit No.:
Issue(s): Resource Adequacy Concern
Witness/Type of Exhibit: Robinett/Rebuttal
Sponsoring Party: Public Counsel
Case No.: EF-2022-0155

REBUTTAL TESTIMONY

OF

JOHN A. ROBINETT

Submitted on Behalf of the Office of the Public Counsel

**EVERGY MISSOURI WEST, INC. D/B/A
EVERGY MISSOURI WEST**

CASE NO. EF-2022-0155

**

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Denote Confidential Information that has been redacted.

June 30, 2022

PUBLIC

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**


In the Matter of the Application of Evergy)
Missouri West, Inc. d/b/a Evergy Missouri)
West for a Financing Order Authorizing the) File No. EF-2022-0155
Financing of Extraordinary Storm Costs)
Through an Issuance of Securitized Utility)
Tariff Bonds)

AFFIDAVIT OF JOHN A. ROBINETT

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

John A. Robinett, of lawful age and being first duly sworn, deposes and states:

1. My name is John A. Robinett. I am a Utility Engineering Specialist for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.



John A. Robinett
Utility Engineering Specialist

Subscribed and sworn to me this 29th day of June 2022.



TIFFANY HILDEBRAND
My Commission Expires
August 8, 2023
Cole County
Commission #16837121



Tiffany Hildebrand
Notary Public

My Commission expires August 8, 2023.

REBUTTAL TESTIMONY

OF

JOHN A. ROBINETT

EVERGY MISSOURI WEST, INC.

CASE No. EF-2022-0155

1 **Q. What is your name and what is your business address?**

2 A. John A. Robinett, PO Box 2230, Jefferson City, Missouri 65102.

3 **Q. By whom are you employed and in what capacity?**

4 A. I am employed by the Missouri Office of the Public Counsel (“OPC”) as a Utility Engineering
5 Specialist.

6 **Q. Have you previously provided testimony before the Missouri Public Service
7 Commission?**

8 A. Yes. Both as a former member of Commission Staff and on behalf of the OPC.

9 **Q. What is your work and educational background?**

10 A. A copy of my work and educational experience is attached to this testimony as Schedule
11 JAR-R-1.

12 **Q. What is the purpose of your rebuttal testimony?**

13 A. OPC witness Lena M. Mantle is providing rebuttal testimony to the assertion by Evergy
14 Missouri West, Inc. (“Evergy Missouri West”) witness John Bridson that Evergy Missouri
15 West was prudent in its actions that resulted in it incurring extraordinary costs in February
16 2021. The purpose of my testimony is to provide additional support for OPC witness Lena
17 Mantle’s rebuttal recommendations in this case. As part of this testimony, I will provide a
18 small historical sample of filings where OPC witnesses expressed concerns regarding
19 Evergy Missouri West’s resource planning.

1 **Q. Does Mr. Bridson discuss Evergy Missouri West’s generation fleet?**

2 A. Yes. At page 4 line 15 of his direct testimony Mr. Bridson presents a table that discusses
3 Evergy Missouri West’s generation fleet. This table continues on to page 5. The table lists
4 the generating units both that Evergy Missouri West owns and those it contracted for
5 through purchase power agreements, the generation type, and the economic max capacity¹
6 of the units.

7 **Q. Are you aware of any reports released by the Southwest Power Pool (“SPP”) that**
8 **address resource adequacy of its members?**

9 A. Yes, annually since 2017 SPP releases a June resource adequacy report to show how its
10 members are meeting their planning reserve margin. Review of these reports for Evergy
11 Missouri West (formerly Greater Missouri Operations Company) is difficult. The only year
12 that Evergy Missouri West appears in the report is 2017, when SPP provided a five year
13 outlook for each of its member utilities regarding each utility’s planning reserve margin.
14 Attached as Schedule JAR-R-2 are the title pages for each year’s report followed by the
15 reserve margin charts for Evergy Missouri. So in Schedule JAR-R-2, the 2017 SPP June
16 resource adequacy report will show Greater Missouri Operations Company and Kansas
17 City Power & Light separately; starting in 2018 and continuing through the 2022 report
18 both entities are filed combined under Kansas City Power & Light.

¹ The difference between economic max capacity and SPP accredited capacity is discussed in Evergy Missouri West response to OPC data request 8002. “Economic Max Capacity is an operational metric which indicates the max capacity utilized in market offers to the SPP Integrated Market. SPP accredited capacity is based on capability and operational tests...”

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1 **Q. Have members of OPC previously filed their concerns regarding resource adequacy**
2 **for Evergy Missouri West with this Commission?**

3 A. Yes. OPC employees have identified concerns about resource adequacy in Case Nos. EO-
4 2017-0230, EO-2018-0045, EO-2018-0269, and ER-2018-0146. Attached as Schedule
5 JAR-R-3 is *Comments of the Office of Public Counsel* filed on July 28, 2017 in Case No.
6 EO-2017-0230, the case established for Evergy Missouri West's 2017 resource plan annual
7 update. Attached as Schedule JAR-R-4C is *Public Counsel's Amended Suggested Special*
8 *Contemporary Resource Planning Issues* that was filed on September 27, 2017 in Case No.
9 EO-2018-0045, the case established for the determination of suggested special
10 contemporary resource planning topics for Evergy Missouri West's next triennial
11 integrated resource plan or next annual report. Attached as Schedule JAR-R-5 is *Comments*
12 *of the Office of the Public Counsel* that was filed on August 30, 2018 in Case No. EO-
13 2018-0269, the case established for Evergy West's 2018 Triennial Compliance Filing.
14 Additionally OPC witness Lena M. Mantle in Case No. ER-2018-0146 also discussed her
15 concerns regarding Evergy Missouri West's lack of generating capacity in both her rebuttal
16 and surrebuttal testimonies.

17 **Q. Have you previously filed testimony on resource adequacy for Evergy Missouri West?**

18 A. Yes. I filed direct testimony on the impact of the retirement of Evergy Missouri West's
19 coal generation in Evergy Missouri West's last rate case, Case No. ER-2018-0146.
20 Because it is still applicable to the instant case, Case No. EF-2022-0155, that testimony in
21 its entirety is attached as Schedule JAR-R-6C.

22 **Q. Does this conclude your rebuttal testimony?**

23 A. Yes, it does.