

*Exhibit No.:*  
*Issue(s):* Fuel Adjustment Clause  
*Witness:* Amanda C. Conner  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Surrebuttal and True-Up  
Direct Testimony  
*Case Nos.:* ER-2022-0129 and  
ER-2022-0130  
*Date Testimony Prepared:* August 16, 2022

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**ENERGY RESOURCES DEPARTMENT**

**SURREBUTTAL AND  
TRUE-UP DIRECT TESTIMONY**

**OF**

**AMANDA C. CONNER**

**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*

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**TABLE OF CONTENTS OF  
SURREBUTTAL AND  
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EXECUTIVE SUMMARY ..... 1

SURREBUTTAL..... 2

TRUE-UP DIRECT ..... 4

    REVISED BASE FACTOR ..... 4

    REVISED TRANSMISSION PERCENTAGE ..... 5

    FAC VOLTAGE ADJUSTMENT FACTORS ..... 5

1  
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**SURREBUTTAL AND  
TRUE-UP DIRECT TESTIMONY**

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**OF**

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**AMANDA C. CONNER**

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

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

9 Q. Please state your name, employment position, and business address.

10 A. Amanda C. Conner, Utility Regulatory Auditor with the Missouri Public Service  
11 Commission (“Commission” or “PSC”), 200 Madison Street, Jefferson City, Missouri 65102.

12 Q. Are you the same Amanda C. Conner who previously provided testimony in  
13 this case?

14 A. Yes. I filed direct and rebuttal testimony in the Evergy Metro, Inc., d/b/a Evergy  
15 Missouri Metro (“EMM”) and Evergy Missouri West, Inc., d/b/a Evergy Missouri West  
16 (“EMW”) (collectively “Company”) rate cases designated as Case No. ER-2022-0129 and Case  
17 No. ER-2022-0130, respectively, on June 8, 2022, direct testimony for Class Cost of Service  
18 filed on June 22, 2022, and rebuttal testimony filed on July 13, 2022.

19 Q. What is the purpose of your surrebuttal and true-up direct testimony?

20 A. The purpose of my surrebuttal testimony is to address EMM and EMW witness  
21 Linda J. Nunn’s Fuel Adjustment Clause (FAC) rebuttal testimony in which she requests the  
22 continuation of the Company’s FAC with modifications. The purpose of my true-up testimony  
23 is to provide an update to the FAC.

24 **EXECUTIVE SUMMARY**

25 Q. What is the purpose of your surrebuttal testimony?

Surrebuttal and  
True-Up Direct Testimony of  
Amanda C. Conner

1           A.     The purpose of my surrebuttal testimony is to address the concerns Company  
2 witness Linda Nunn mentions in her rebuttal testimony to my direct testimony. This essentially  
3 consists of clarifying Staff's position in regards to the FAC tariff.

4           Q.     What is the purpose of your true-up direct testimony?

5           A.     I will discuss a true-up of Staff's FAC base factor as of the true-up date of  
6 December 31, 2021.

7     **SURREBUTTAL**

8           Q.     On page 16, lines 6-10 of Ms. Nunn's rebuttal testimony, she states that Staff  
9 did not provide a proposed tariff sheet to clarify that the only transmission costs included in  
10 EMM's and EMW's tariff sheets are those that are incurred for purchased power (PP) and  
11 off system sales (OSS). Was it your intention to request a change in the language in the current  
12 tariff sheets?

13          A.     No, I was not suggesting that new tariff language was needed. The  
14 recommendation should not have been to clarify, but to keep the current tariff language that  
15 states that the only transmission costs to be included in EMM's and EMW's FAC tariffs are  
16 only those that are incurred for PP and OSS.

17          Q.     On page 16, lines 11-20, of Ms. Nunn's rebuttal testimony, Ms. Nunn agrees to  
18 continue to provide the FAC monthly reports, but she stated that Staff describes the monthly  
19 reports differently from what the Company provides or different from one jurisdiction to  
20 another. Was it your intention to request changes to the monthly reports?

21          A.     No, Staff agrees the current information provided in both EMM's and EMW's  
22 FAC monthly reports is sufficient. I included the requested language from the last rate cases,

1 ER-2018-0145 and ER-2018-0146, for reference of what was requested. However, there is  
2 no need to make any changes to the FAC monthly reports provided by the Company.

3 Q. On page 17, lines 11-16 of Ms. Nunn's rebuttal testimony, she questions why  
4 Staff believes that EMW's base factor calculation should be modified to take into consideration  
5 the Company's proposed industrial steam auxiliary power calculation. Ms. Nunn explains that  
6 this is not appropriate, as costs associated with auxiliary power will be moved from an account  
7 included in the FAC calculation to an account not included in the FAC calculation. Why did  
8 Staff make this recommendation?

9 A. Staff sent Data Request No. 0258 and subsequent Data Request No. 0258.1  
10 regarding the industrial steam auxiliary power calculation. Though Staff received the  
11 calculation, EMW's response to the data requests was not clear on how EMW would account  
12 for it. However, since Ms. Nunn explains in her rebuttal testimony in the sections stated above  
13 that the fuel runs used to establish base rates in the EMW electric case includes electric usage  
14 only and does not include costs associated with EMW's industrial steam production, Staff's  
15 initial recommendation to account for this adjustment in the FAC base factor is no longer  
16 needed. However, as the Company stated in its response to Data Request No. 0258S,  
17 the auxiliary power general ledger entry will be separate from the already existing steam  
18 transfer credits. If Staff understands EMW's process to be that the auxiliary power amount  
19 used to produce industrial steam is reduced from the fuel accounts before these fuel accounts  
20 hit the FAC, then Staff would agree that a further adjustment to reduce fuel costs for auxiliary  
21 power for industrial steam is not needed for purposes of future Fuel Adjustment Rate (FAR)  
22 filings. If the FAC recoverable fuel accounts are not already reduced for the auxiliary power  
23 for industrial steam, then Staff expects this adjustment to be made within the FAR filings, to

1 reduce recoverable fuel costs. Either way, Staff requests that future FAR workpapers  
2 demonstrate this calculation for industrial steam auxiliary power and its effects on the FAR  
3 filings. Staff is also open to the possibility of additional wording in the FAC tariff to clarify this  
4 process to all parties.

5 Q. On page 17, line 17 through page 18, line 15, Ms. Nunn stated that the voltage  
6 levels set by Staff do not include the substation levels. Do you agree with the changes Ms. Nunn  
7 makes in her rebuttal testimony?

8 A. This will be addressed in detail in Staff witness Alan J. Bax's surrebuttal  
9 testimony, but Staff agrees that the substation voltage levels should be included.

10 Q. Does this conclude your surrebuttal testimony?

11 A. Yes.

12 **TRUE-UP DIRECT**

13 **REVISED BASE FACTOR**

14 Q. What is Staff recommending for EMM's and EMW's True-Up Base Factors?

15 A. Staff calculated the base factor (BF) rate in this case based upon the following  
16 information in Staff's cost of service (COS) Report: (1) net base energy costs (fuel and  
17 purchased power costs less OSS revenue) including Staff's accounting adjustments to test year;  
18 and (2) normalized net system inputs (NSI):

19                   ▪ EMM Base Factor:

20	Net Fuel and PP	\$265,580,284
21	NSI	<u>\$15,300,113,486</u>
22	BF	\$0.01736 per kWh

1	▪	EMW Base Factor:	
2		Net Fuel and PP	\$253,857,113
3		NSI	<u>\$8,845,014,770</u>
4		BF	\$0.02870 per kWh

5 **REVISED TRANSMISSION PERCENTAGE**

6 Q. What are the percentages Staff recommends for EMM's and EMW's true-up  
7 transmission costs?

8 A. As provided in Staff witness Shawn E. Lange's true-up workpapers,<sup>1</sup> Staff  
9 calculated the pass-through percentage of Southwest Power Pool (SPP) transmission costs<sup>2</sup> in  
10 the FAC as 33.1% for EMM. As provided in Staff witness Charles T. Poston's true-up  
11 workpapers,<sup>3</sup> Staff calculated the pass-through percentage of SPP transmission costs<sup>4</sup> in the  
12 FAC as 75.43% for EMW. This calculation is based on the output from Staff's fuel models that  
13 were used to develop the revenue requirements found in Staff's COS report for this case. The  
14 calculations are appropriate because they are consistent with the method used to calculate the  
15 pass-through percentage of SPP transmission costs for EMM's and EMW's current FAC.

16 **FAC VOLTAGE ADJUSTMENT FACTORS**

17 Q. What is Staff recommending as the FAC Voltage Adjustment Factors at this  
18 time?

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<sup>1</sup> Workpaper titled "TU EMM DIRECT FUEL Summary 72722" tab "FAC%".

<sup>2</sup> The pass-through percentage of SPP transmission costs are a representation of transmission expenses that are associated with energy purchases from the SPP IM in excess of energy generation by EMM's and EMW's respective generation units.

<sup>3</sup> Workpaper titled "EMW True-Up Fuel Model Results – 08-08-22" tab "FAC%".

<sup>4</sup> The pass-through percentage of SPP transmission costs are a representation of transmission expenses that are associated with energy purchases from the SPP IM in excess of energy generation by EMM's and EMW's respective generation units.

1 As explained in Staff witness Alan J. Bax's testimonies in this case, Staff continues to  
2 use the voltage adjustment factors<sup>5</sup> presently included in the FAC tariff sheets for EMM's and  
3 EMW's most recent general rate cases in the current general rate case as provided in the  
4 following table.

5

	<b>EMM</b>	<b>EMW</b>
<b>Voltage Level</b>	<b>Voltage Adjustment Factor</b>	
Transmission	1.03	1.03
Substation	1.0378	1.0388
Primary	1.0496	1.0503
Secondary	1.0690	1.0766

6  
7 Q. Does this conclude your true-up direct testimony?

8 A. Yes it does.

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<sup>5</sup> Alan J. Bax's voltage testimony can be found in his surrebuttal testimony, page 3, line 15 through page 4, line 18.



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 ) Case No. ER-2022-0130  
Authority to Implement a General Rate )  
Increase for Electric Service )

**AFFIDAVIT OF AMANDA C. CONNER**

STATE OF MISSOURI     )  
  )     ss.  
COUNTY OF COLE     )

COMES NOW AMANDA C. CONNER and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Surrebuttal / True-Up Direct Testimony of Amanda C. Conner*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

  
AMANDA C. CONNER

**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 10<sup>th</sup> day of August 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