

Exhibit No.:
Issue: Fuel Adjustment Clause True-Up
Witness: Lisa A. Starkebaum
Type of Exhibit: Direct Testimony
Sponsoring Party: Evergy Missouri West
Case No.: EO-2020-0420
Date Testimony Prepared: June 30, 2020

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: EO-2020-0420

DIRECT TESTIMONY

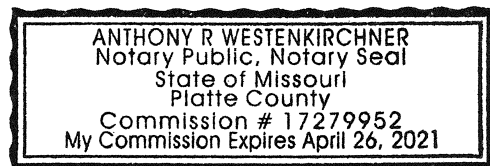
OF

LISA A. STARKEBAUM

ON BEHALF OF

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

**Kansas City, Missouri
June 2020**



DIRECT TESTIMONY

OF

LISA A. STARKEBAUM

Case No. EO-2020-0420

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

2 A: My name is Lisa A. Starkebaum. My business address is 1200 Main, Kansas
3 City, Missouri 64105.

4 **Q: By whom and in what capacity are you employed?**

5 A: I am employed by Evergy, Inc. or the “Company”, formerly Kansas City Power &
6 Light Company (“KCP&L”), as Manager, Regulatory Affairs.

7 **Q: What are your responsibilities?**

8 A: My responsibilities include the coordination, preparation and review of financial
9 information and schedules associated with the Company’s compliance filings for
10 Evergy including: Evergy Kansas Central, Evergy Kansas Metro, Evergy
11 Missouri Metro and Evergy Missouri West.

12 **Q: Please describe your education.**

13 A: In 1994, I received a Bachelor of Science Degree in Finance from Northwest
14 Missouri State University in Maryville, Missouri.

15 **Q: Please provide your work experience.**

16 A: In 1995, I joined Cerner Corporation as an Accountant in the Finance Department
17 assisting with month-end close and reporting responsibilities. In 1997, I joined
18 Aquila, Inc. (“Aquila”) where I worked in the Financial and Regulatory Reporting
19 group as an Accountant, until joining Regulatory Accounting Services as a

1 Regulatory Analyst in 1999. I was employed by Aquila for a total of 11 years
2 prior to beginning my employment with KCP&L in July 2008 as a part of the
3 acquisition of Aquila, Inc., by Great Plains Energy Incorporated. Since that time,
4 I have held various positions with increasing responsibilities within Regulatory
5 Accounting Services and Regulatory Affairs. As a Lead Analyst in the
6 Regulatory Affairs department, my main areas of responsibility included the
7 preparation of FERC and jurisdictional reporting, and the preparation of rate cases
8 and rate case support for both KCP&L and GMO. In December 2015, I became a
9 Supervisor, Regulatory Affairs responsible for overseeing a team dedicated to
10 compliance reporting and was later promoted to Manager, Regulatory Affairs
11 effective June 2018. In my current position, I am responsible for overseeing
12 various reporting requirements to ensure Evergy is compliant with its
13 jurisdictional rules and regulations, in addition to the implementation of new
14 reporting or commitments resulting from various rate case orders and other
15 regulatory filings. In addition, I oversee the coordination, review and filing of the
16 various rider mechanisms.

17 **Q: Have you previously testified in a proceeding before the Missouri Public**
18 **Service Commission (“MPSC” or “Commission”) or before any other utility**
19 **regulatory agency?**

20 A: Yes, I have testified before the MPSC, the Kansas Corporation Commission
21 (“KCC” or “Commission”) and have provided written testimony before the Public
22 Utilities Commission of Colorado. I have sponsored testimony in Missouri related
23 to various tariff filings involving rider mechanisms utilized by the Company. In

1 addition, I have worked closely with both MPSC and KCC Staff on numerous
2 filings and rate case matters.

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

4 A: The purpose of my testimony is to support the 23rd true-up filing being made by
5 Evergy Missouri West under the provisions in 20 CSR 4240-20.090(9) and the
6 Company's approved fuel and purchased power cost recovery mechanism or
7 FAC.

8 **Q: What is the purpose of the true-up filing?**

9 A: Evergy Missouri West's FAC tariff requires a true-up filing by the filing date of
10 its Fuel Adjustment Rate ("FAR") filing following the completion of each
11 recovery period. Per the tariff, the true-up amount shall be the difference between
12 the revenues billed and the revenues authorized for collection during the recovery
13 period as well as any corrections identified to be included in the current FAR
14 filing. The purpose of this true-up filing is to identify the amount over or under-
15 recovered from the 23rd 12-month recovery period.

16 **Q: Please explain the FAC process, including the accumulation, filing, recovery**
17 **and true-up periods.**

18 A: Each FAC begins with an accumulation period which covers a six-month period
19 in which the costs of the fuel and purchased power components net of off system
20 sales revenues contained in the FAC are accumulated and compared to the base
21 energy costs that are in rates over that same time frame. The net of the costs
22 compared to the base energy costs in current rates is the amount to be recovered
23 or returned to customers over the recovery period. After the accumulation period,

1 Everygy Missouri West files with the Commission the FAR. The FAR is the rate
2 that will be charged to customers over the recovery period. The time between the
3 accumulation period and the beginning of the recovery period is three months.
4 The recovery period is 12 months. After the recovery period, a true-up is filed
5 which reflects all the activities and summarizes the balances of the FAC. The
6 balances will then be included in the next FAR filing.

7 **Q: What was the timing of the accumulation and recovery relating to this true-**
8 **up?**

9 A: The 23rd accumulation period consists of six months of fuel and purchased power
10 expenses net of off system sales revenues, or June 2018 through November 2018.
11 The recovery period for this accumulation period was March 2019 through
12 February 2020.

13 **Q: Why would there be a difference between the accumulated over or under-**
14 **recovery and the amount billed during the recovery period?**

15 A: The FAR is calculated based upon projected kWh sales for the recovery period.
16 Since the FAR is based on a projected number, once actual sales are recorded, a
17 difference exists between the estimate and the actual kWh billed. This difference
18 will be “trued-up” in the next FAC filing.

19 **Q: What was the difference between what was accumulated, along with interest,**
20 **and the amount billed through the recovery mechanism?**

21 A: For this 23rd accumulation period, the GMO FAC was under-collected by
22 \$3,916,405.

23 **Q: What impact will this have on future FAC adjustment rate schedules filed?**

1 A: The proposed true-up amount in this filing will be included in the next semi-
2 annual FAC rate schedule filing that is being made concurrent with this true-up
3 filing. The Company's 23rd FAC recovery period ended February 2020;
4 therefore, the under-recovery of \$3,916,405 will be included in the 26th
5 accumulation period semi-annual filing to be made on June 30, 2020 covering the
6 accumulation period of December 2019 through May 2020.

7 **Q: How did you develop the proposed true-up amount that is being requested in**
8 **this filing?**

9 A: As indicated above, the true-up amount is the net of the accumulated expenditures
10 over or under the base FAC costs as set in rates during the accumulation period
11 plus interest and any adjustments, and the amount billed during the recovery
12 period. The details associated with this calculation are filed along with this
13 testimony in Schedule LAS-1. This schedule contains a summary and all
14 supporting work papers for the calculation.

15 **Q: Is there anything additional impacting this true-up filing that should be**
16 **mentioned?**

17 A: Yes, there are three items to note in this filing.

18 First, Case No. ER-2019-0198 covering the 23rd accumulation period was
19 the first FAR filing under Plant in Service Accounting ("PISA") where the
20 Company elected to make deferrals permitted under Section 393.1400 RSMo
21 effective January 1, 2019. Therefore, in the 23rd accumulation period FAR filing,
22 the rate cap provisions of section 393.1655 RSMo were applied. While the change
23 in the FAC charge proposed in this filing did not increase the average overall rate

1 for customers by more than 3% as described in section 393.1655.5, the class
2 average overall rate for the Large Power (“LP”) customer class exceeded the 2%
3 limitation, as described in section 393.1655.6 RSMo. As stated in the PISA rules,
4 Missouri West limited the increase in the FAC charge applicable to LP customers
5 to 2% of the class average overall rate for that rate class, with the reduced
6 revenues arising from limiting the LP service class average overall rate increase
7 allocated to all other customer classes. This resulted in an adjustment of
8 \$2,500,908 as well as the implementation of separate rates for Large Power
9 Service customers and Non-Large Power Service customers. Based on
10 discussions with Commission Staff, for this first FAC filing impacted by Section
11 393.1655.6, the Non-Large Power (“Non-LP”) FAR was adjusted to exclude the
12 amount in excess of the 2% cap on the LP customer class, or \$2,500,908. This
13 amount remained deferred for recovery until the true-up period included in this
14 filing, the 23rd accumulation period and the corresponding 23rd recovery period of
15 March 2019 through February 2020 ended. Therefore, the Company has included
16 for recovery the \$2,500,908 deferred amount in the true-up calculation as
17 reflected in the supporting workpapers to this filing.

18 Second, the Company is adding back amounts previously removed in prior
19 FAR calculations related to Lake Road steam auxiliary power expenses. This
20 adjustment amounts to \$803,113 or \$773,499 in steam auxiliary power reductions
21 plus interest of \$29,614. OPC objected to the Company’s inclusion of these costs
22 in its FAR filings as well as the allocation methodology utilized by the Company
23 to calculate the steam auxiliary power costs. The Company reduced its ANEC

1 for steam auxiliary power expense in three prior accumulation periods: 22nd
2 accumulation period Case No. ER-2018-0400, 23rd accumulation period Case No.
3 ER-2019-0198 and the 24th accumulation period Case No. ER-2019-0413. The
4 Company continued to make these adjustments as requested by OPC until the
5 Commission ruling in the Company's eighth FAC prudence review, Case No. EO-
6 2019-0067, where this issue was litigated before the Commission. In the
7 Commission's Order dated November 6, 2019, the Commission concluded that
8 the Company's indirect cost assignment method for allocating costs associated
9 with auxiliary power between electric and steam operations at the Lake Road
10 generating station was not imprudent. Although OPC filed a Motion for
11 Rehearing and Reconsideration on this issue, the Commission denied OPC's
12 request on January 8, 2020. This issue is now final and unappealable; therefore,
13 the Company is now seeking recovery of the amounts previously removed for
14 steam auxiliary power expense in this true-up filing. An additional tab, 9 (A) 2.B
15 in the workpapers has been provided with details for this correction.

16 Lastly, the presentation of materials and supporting documentation
17 provided in this true-up filing has been updated to reflect the recovery of LP and
18 Non-LP revenue separately by voltage: Primary, Secondary, Substation and
19 Transmission as there were separate FAC billing rates by Substation and
20 Transmission voltages, effective September 2019. There is no recovery revenue
21 shown for Non-Large Power Substation or Non-Large Power Transmission
22 voltages because there are no existing billing rates on those voltages. Substation
23 and Transmission voltages are Large Power only.

1 **Q: What action is the Company requesting from the Commission with respect to**
2 **this true-up filing?**

3 A: As provided by 20 CSR 4240-20.090(9), a true-up filing is required at least
4 annually. Pursuant to the Company's FAC tariff, the amount of the true-up will
5 be included in the next accumulation period. The Company requests that the
6 Commission approve the amount to be included in the 26th accumulation period
7 which will cover the six months ended May 2020.

8 **Q: Does this conclude your testimony?**

9 A: Yes, it does.

**Information Required By
20 CSR 4240-20.090 (9)
True-Ups of RAMs**

Evergy Missouri West (formerly KCP&L Greater Missouri Operations Company)

9 (A) 2.A - Any revision to the calculation of the net base energy cost

None

Evergy Missouri West (formerly KCP&L Greater Missouri Operations Company)

9 (A) 2.B - Any other proposed adjustments or refunds not related to the calculation of the net base energy cost

In Case No.'s ER-2018-0400, ER-2019-0198 and ER-2019-0413, the Company reduced its ANEC for steam auxiliary power expenses. In Case No. EO-2019-0067 (GMO's 8th prudence review), the Commission concluded that the Company's indirect cost assignment method for allocating costs associated with auxiliary power between electric and steam operations at Lake Road generating station was not imprudent. Therefore, the Company is adding back the steam auxiliary power amounts previously removed and including them for recovery in this true-up.

Steam Auxiliary Power adjustments previously included in FAR






Included as credit in May 2018	\$	(229,811.78)	
less 5%	\$	11,490.59	
Less Muni % 0.29%	\$	634.60	
	\$	(217,686.59)	removed from 22nd Accumulation ER-2018-0400
Included as credit in Nov 2018	\$	(275,648.00)	
less 5%	\$	13,782.40	
Less Muni % 0.28%	\$	732.36	
	\$	(261,133.24)	removed from 23rd Accumulation ER-2019-0198
Included as credits each month:			
Dec 1-5 2018	\$	(9,006.45)	
less 5%	\$	450.32	
Less Muni % 0.46%	\$	39.36	
	\$	(8,516.77)	
Dec 6-31 2018		(46,834)	
less 5%	\$	2,341.68	
Less Muni % 0.46%	\$	204.62	
	\$	(44,287.25)	
Jan 2019	\$	(54,996.00)	
less 5%	\$	2,749.80	
Less Muni % 0.38%	\$	198.17	
	\$	(52,048.03)	
Feb 2019	\$	(52,655.00)	
less 5%	\$	2,632.75	
Less Muni % 0.47%	\$	232.90	
	\$	(49,789.35)	
Mar 2019	\$	(49,637.00)	
less 5%	\$	2,481.85	
Less Muni % 0.35%	\$	165.72	
	\$	(46,989.43)	
Apr 2019	\$	(50,746.00)	
less 5%	\$	2,537.30	
Less Muni % 0.43%	\$	205.69	
	\$	(48,003.01)	
May 2019	\$	(47,507.00)	
less 5%	\$	2,375.35	
Less Muni % 0.19%	\$	86.65	
	\$	(45,045.00)	
	\$	(294,678.84)	removed from 24th Accumulation ER-2019-0413
Total	\$	(773,498.67)	

Steam Auxiliary Power adjustments to add back

Total Correction					
	Add back Steam Aux	Balance	Interest Rate	Interest	
May-18	\$ 217,686.59				
Jun-18		\$ 217,686.59	0.28%	\$ 602.27	
Jul-18		\$ 217,686.59	0.28%	\$ 604.08	
Aug-18		\$ 217,686.59	0.28%	\$ 602.27	
Sep-18		\$ 217,686.59	0.29%	\$ 622.22	
Oct-18		\$ 217,686.59	0.30%	\$ 642.18	
Nov-18	\$ 261,133.24	\$ 478,819.83	0.30%	\$ 1,424.49	
Dec-18	\$ 52,804.02	\$ 531,623.85	0.31%	\$ 1,639.17	
Jan-19	\$ 52,048.03	\$ 583,671.88	0.31%	\$ 1,828.84	
Feb-19	\$ 49,789.35	\$ 633,461.23	0.31%	\$ 1,974.29	
Mar-19	\$ 46,989.43	\$ 680,450.66	0.31%	\$ 2,120.74	
Apr-19	\$ 48,003.01	\$ 728,453.67	0.31%	\$ 2,264.28	
May-19	\$ 45,045.00	\$ 773,498.67	0.31%	\$ 2,378.51	
Jun-19		\$ 773,498.67	0.30%	\$ 2,352.73	
Jul-19		\$ 773,498.67	0.30%	\$ 2,288.27	
Aug-19		\$ 773,498.67	0.29%	\$ 2,204.47	
Sep-19		\$ 773,498.67	0.27%	\$ 2,120.68	
Oct-19		\$ 773,498.67	0.26%	\$ 2,017.54	
Nov-19		\$ 773,498.67	0.25%	\$ 1,927.30	
					\$ 29,614.30
		Balance	\$ 773,498.67		
		Interest	\$ 29,614.30		
		Total Correction	\$ 803,112.97		

**Evergy Missouri West (formerly KCP&L
Greater Missouri Operations Company)**

**9 (A) 2.C - Calculation of the monthly amount
that was over-billed or under-billed through
its RAM**

	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	
			23rd Accumulation period					Filing and Approval					
23rd Accumulation	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	
(Over)/Under Adjustment from 20th Accum			(55,005.47)										
C/M (Over)/Under Accrued	6,609,264.17	5,371,272.67	2,143,448.20	1,285,549.99	4,348,592.70	9,196,452.72				2,328,296.51	1,788,344.88	1,800,971.69	
C/M (Over)/Under Recovery	-	-	-	-	-	-				27,029,835	25,241,490	23,440,518	
CUMM (Over)/Under Balance	6,609,264	11,980,537	14,068,980	15,354,530	19,703,122	28,899,575	29,358,131	29,358,131	29,358,131				
Monthly Short Term Debt Rate rate	0.28%	0.28%	0.28%	0.29%	0.30%	0.30%							
C/M Accrued interest (P/M Bal)	49,971.31	66,470.37	78,209.69	84,066.49	85,335.12	94,503.40							
CUMM Accrued Interest Balance	49,971	116,442	194,651	278,718	364,053	458,556							
									24th Accumulation period				
24th Accumulation							Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	
(Over)/Under Adjustment from 21st Accum									(197,556.82)				
C/M (Over)/Under Accrued							3,393,517.86	1,948,277.80	2,882,372.97	4,479,140.07	1,507,624.99	(226,914.76)	
C/M (Over)/Under Recovery							-	-	-	-	-	-	
CUMM (Over)/Under Balance							3,393,518	5,341,796	8,026,612	12,505,752	14,013,377	13,786,462	
PISA Deferral													
Monthly Short Term Debt Rate rate							0.31%	0.31%	0.31%	0.31%	0.31%	0.31%	
C/M Accrued interest (P/M Bal)							121,853.82	130,896.66	130,945.90	134,346.25	137,657.94	132,962.22	
CUMM Accrued Interest Balance							121,854	252,750	383,696	518,043	655,701	788,663	
25th Accumulation													
(Over)/Under Adjustment from 22nd Accum													
C/M (Over)/Under Accrued													
C/M (Over)/Under Recovery													
CUMM (Over)/Under Balance													
Monthly Short Term Debt Rate rate													
C/M Accrued interest (P/M Bal)													
CUMM Accrued Interest Balance													
26th Accumulation													
(Over)/Under Adjustment from 23rd Accum													
C/M (Over)/Under Accrued													
C/M (Over)/Under Recovery													
CUMM (Over)/Under Balance													
Add back Steam Aux adj previously removed													
Monthly Short Term Debt Rate rate													
C/M Accrued interest (P/M Bal)													
CUMM Accrued Interest Balance													

**Evergy Missouri West (formerly KCP&L
Greater Missouri Operations Company)**

**9 (A) 2.C - Calculation of the monthly amount
that was over-billed or under-billed through
its RAM**

	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20
	Recovery Period											
23rd Accumulation	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20			
(Over)/Under Adjustment from 20th Accum												
C/M (Over)/Under Accrued												
C/M (Over)/Under Recovery	1,922,603.24	2,699,543.98	2,620,504.50	2,361,518.17	2,162,286.43	1,835,058.63	2,202,203.89	2,243,645.90	2,279,861.42			
CUMM (Over)/Under Balance	21,517,915	18,818,371	16,197,867	13,836,348	11,674,062	9,839,003	7,636,799	5,393,154	3,113,292			
Monthly Short Term Debt Rate rate												
C/M Accrued interest (P/M Bal)												
CUMM Accrued Interest Balance												
	Filing and Approval					Recovery Period						
24th Accumulation	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20
(Over)/Under Adjustment from 21st Accum												
C/M (Over)/Under Accrued				947,983.50	870,928.62	738,028.70	884,969.04	900,941.61	915,916.83	805,564.63	700,613.68	603,901.68
C/M (Over)/Under Recovery				13,627,141	9,222,419	8,484,390	7,599,421	6,698,479	5,782,563	4,976,998	4,276,384	3,672,483
CUMM (Over)/Under Balance	14,575,125	14,575,125	14,575,125	(3,533,794)								
PISA Deferral												
Monthly Short Term Debt Rate rate												
C/M Accrued interest (P/M Bal)												
CUMM Accrued Interest Balance												
	25th Accumulation period						Filing and Approval			Recovery Period		
25th Accumulation	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20
(Over)/Under Adjustment from 22nd Accum			128,984.31									
C/M (Over)/Under Accrued	1,056,746.59	316,724.52	369,249.62	639,197.86	(210,282.70)	144,977.93						
C/M (Over)/Under Recovery	-	-	-	-	-	-				209,819.25	183,874.37	157,616.16
CUMM (Over)/Under Balance	1,056,747	1,373,471	1,871,705	2,510,903	2,300,620	2,445,598	3,013,594	3,013,594	3,013,594	2,803,774	2,619,900	2,462,284
Monthly Short Term Debt Rate rate	0.30%	0.30%	0.29%	0.27%	0.26%	0.25%						
C/M Accrued interest (P/M Bal)	122,948.78	116,961.64	102,601.53	89,500.88	78,183.21	57,799.44						
CUMM Accrued Interest Balance	122,949	239,910	342,512	432,013	510,196	567,995						
							26th Accumulation period					
26th Accumulation							Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20
(Over)/Under Adjustment from 23rd Accum									3,113,292.11			
C/M (Over)/Under Accrued							(662,095.30)	(567,665.76)	3,498,156.18	(4,338,386.46)	(2,128,888.83)	(3,093,128.83)
C/M (Over)/Under Recovery							-	-	-	-	-	-
CUMM (Over)/Under Balance							(662,095)	(426,648)	6,184,800	1,846,414	(282,475)	(3,375,604)
Add back Steam Aux adj previously removed							803,113					
Monthly Short Term Debt Rate rate							0.25%	0.24%	0.24%	0.18%	0.16%	0.12%
C/M Accrued interest (P/M Bal)							53,930.26	44,904.28	35,350.91	27,215.40	15,644.18	7,991.69
CUMM Accrued Interest Balance							53,930	98,835	134,185	161,401	177,045	185,037

Evergy Missouri West (formerly KCP&L Greater Missouri Operations Company)**9 (A) 2.D (I) - Explanation of how short-term borrowing rate was determined**

Evergy, Inc.'s pricing grid under the credit facility as of September 18, 2018 is below.

Pricing Level	Debt Rating	Applicable Commitment Fee Rate	Applicable Margin for LIBOR Rate Loans, LIBOR Market Index Rate Loans and Letter of Credit Fees	Applicable Margin for Base Rate Loans
I	≥ AA-/Aa3	0.050%	0.750%	0.0%
II	A+/A1	0.075%	0.875%	0.0%
III	A/A2	0.100%	1.000%	0.0%
IV	A-/A3	0.125%	1.125%	0.125%
V	BBB+/Baa1	0.175%	1.250%	0.250%
VI	BBB/Baa2	0.225%	1.500%	0.500%
VII	≤ BBB-/Baa3	0.275%	1.750%	0.750%

Evergy utilizes a commercial paper program as its primary source of short term funding as opposed to borrowing under its revolving credit facility. Evergy issues commercial paper on virtually a daily basis through four independent dealers and interest rates are determined by the financial markets based upon market rates, Evergy's Commercial Paper rating, the amount of funding requested and the term.

Evergy Missouri West (formerly KCP&L Greater Missouri Operations Company)

Credit Ratings as of 11/30/2019	Moody's	Standard & Poors
Senior Unsecured Debt	Baa2	A-
Commercial Paper	P-2	A-2

Evergy Missouri West (formerly KCP&L Greater Missouri Operations Company)

9 (A) 2.D (II) - Calculation of the short-term borrowing rate

Day	Date	One Month LIBOR	Applicable Margin	Upfront Fees	Daily Rate		
Friday	June 1, 2018	2.0047%	1.2500%		3.2547%		
Saturday	June 2, 2018	2.0047%	1.2500%		3.2547%		
Sunday	June 3, 2018	2.0047%	1.2500%		3.2547%		
Monday	June 4, 2018	2.0130%	1.2500%		3.2630%		
Tuesday	June 5, 2018	2.0245%	1.2500%		3.2745%		
Wednesday	June 6, 2018	2.0296%	1.2500%		3.2796%		
Thursday	June 7, 2018	2.0464%	1.2500%		3.2964%		
Friday	June 8, 2018	2.0462%	1.2500%		3.2962%		
Saturday	June 9, 2018	2.0462%	1.2500%		3.2962%		
Sunday	June 10, 2018	2.0462%	1.2500%		3.2962%		
Monday	June 11, 2018	2.0474%	1.2500%		3.2974%		
Tuesday	June 12, 2018	2.0573%	1.2500%		3.3073%		
Wednesday	June 13, 2018	2.0733%	1.2500%		3.3233%		
Thursday	June 14, 2018	2.0851%	1.2500%		3.3351%		
Friday	June 15, 2018	2.0849%	1.2500%		3.3349%		
Saturday	June 16, 2018	2.0849%	1.2500%		3.3349%		
Sunday	June 17, 2018	2.0849%	1.2500%		3.3349%		
Monday	June 18, 2018	2.0838%	1.2500%		3.3338%		
Tuesday	June 19, 2018	2.0879%	1.2500%		3.3379%		
Wednesday	June 20, 2018	2.0836%	1.2500%		3.3336%		
Thursday	June 21, 2018	2.0911%	1.2500%		3.3411%		
Friday	June 22, 2018	2.0978%	1.2500%		3.3478%		
Saturday	June 23, 2018	2.0978%	1.2500%		3.3478%		
Sunday	June 24, 2018	2.0978%	1.2500%		3.3478%		
Monday	June 25, 2018	2.1029%	1.2500%		3.3529%		
Tuesday	June 26, 2018	2.1019%	1.2500%		3.3519%		
Wednesday	June 27, 2018	2.0935%	1.2500%		3.3435%		
Thursday	June 28, 2018	2.0921%	1.2500%		3.3421%		
Friday	June 29, 2018	2.0903%	1.2500%		3.3403%	Average	Monthly Rate
Saturday	June 30, 2018	2.0903%	1.2500%		3.3403%	3.3165%	0.28%
Sunday	July 1, 2018	2.0903%	1.2500%		3.3403%		
Monday	July 2, 2018	2.0999%	1.2500%		3.3499%		
Tuesday	July 3, 2018	2.0859%	1.2500%		3.3359%		
Wednesday	July 4, 2018	2.0873%	1.2500%		3.3373%		
Thursday	July 5, 2018	2.0971%	1.2500%		3.3471%		
Friday	July 6, 2018	2.0863%	1.2500%		3.3363%		
Saturday	July 7, 2018	2.0863%	1.2500%		3.3363%		
Sunday	July 8, 2018	2.0863%	1.2500%		3.3363%		
Monday	July 9, 2018	2.0775%	1.2500%		3.3275%		
Tuesday	July 10, 2018	2.0665%	1.2500%		3.3165%		
Wednesday	July 11, 2018	2.0743%	1.2500%		3.3243%		
Thursday	July 12, 2018	2.0716%	1.2500%		3.3216%		
Friday	July 13, 2018	2.0733%	1.2500%		3.3233%		
Saturday	July 14, 2018	2.0733%	1.2500%		3.3233%		
Sunday	July 15, 2018	2.0733%	1.2500%		3.3233%		
Monday	July 16, 2018	2.0785%	1.2500%		3.3285%		
Tuesday	July 17, 2018	2.0818%	1.2500%		3.3318%		
Wednesday	July 18, 2018	2.0863%	1.2500%		3.3363%		
Thursday	July 19, 2018	2.0810%	1.2500%		3.3310%		
Friday	July 20, 2018	2.0690%	1.2500%		3.3190%		
Saturday	July 21, 2018	2.0690%	1.2500%		3.3190%		
Sunday	July 22, 2018	2.0690%	1.2500%		3.3190%		
Monday	July 23, 2018	2.0636%	1.2500%		3.3136%		
Tuesday	July 24, 2018	2.0701%	1.2500%		3.3201%		
Wednesday	July 25, 2018	2.0769%	1.2500%		3.3269%		
Thursday	July 26, 2018	2.0716%	1.2500%		3.3216%		
Friday	July 27, 2018	2.0768%	1.2500%		3.3268%		
Saturday	July 28, 2018	2.0768%	1.2500%		3.3268%		
Sunday	July 29, 2018	2.0768%	1.2500%		3.3268%		
Monday	July 30, 2018	2.0815%	1.2500%		3.3315%	Average	Monthly Rate
Tuesday	July 31, 2018	2.0814%	1.2500%		3.3314%	3.3287%	0.28%

Evergy Missouri West (formerly KCP&L Greater Missouri Operations Company)

9 (A) 2.D (II) - Calculation of the short-term borrowing rate

Day	Date	One Month LIBOR	Applicable Margin	Upfront Fees	Daily Rate		
Wednesday	August 1, 2018	2.0821%	1.2500%		3.3321%		
Thursday	August 2, 2018	2.0802%	1.2500%		3.3302%		
Friday	August 3, 2018	2.0793%	1.2500%		3.3293%		
Saturday	August 4, 2018	2.0793%	1.2500%		3.3293%		
Sunday	August 5, 2018	2.0793%	1.2500%		3.3293%		
Monday	August 6, 2018	2.0826%	1.2500%		3.3326%		
Tuesday	August 7, 2018	2.0711%	1.2500%		3.3211%		
Wednesday	August 8, 2018	2.0634%	1.2500%		3.3134%		
Thursday	August 9, 2018	2.0673%	1.2500%		3.3173%		
Friday	August 10, 2018	2.0668%	1.2500%		3.3168%		
Saturday	August 11, 2018	2.0668%	1.2500%		3.3168%		
Sunday	August 12, 2018	2.0668%	1.2500%		3.3168%		
Monday	August 13, 2018	2.0627%	1.2500%		3.3127%		
Tuesday	August 14, 2018	2.0635%	1.2500%		3.3135%		
Wednesday	August 15, 2018	2.0600%	1.2500%		3.3100%		
Thursday	August 16, 2018	2.0774%	1.2500%		3.3274%		
Friday	August 17, 2018	2.0694%	1.2500%		3.3194%		
Saturday	August 18, 2018	2.0694%	1.2500%		3.3194%		
Sunday	August 19, 2018	2.0694%	1.2500%		3.3194%		
Monday	August 20, 2018	2.0670%	1.2500%		3.3170%		
Tuesday	August 21, 2018	2.0659%	1.2500%		3.3159%		
Wednesday	August 22, 2018	2.0660%	1.2500%		3.3160%		
Thursday	August 23, 2018	2.0648%	1.2500%		3.3148%		
Friday	August 24, 2018	2.0728%	1.2500%		3.3228%		
Saturday	August 25, 2018	2.0728%	1.2500%		3.3228%		
Sunday	August 26, 2018	2.0728%	1.2500%		3.3228%		
Monday	August 27, 2018	2.0728%	1.2500%		3.3228%		
Tuesday	August 28, 2018	2.0749%	1.2500%		3.3249%		
Wednesday	August 29, 2018	2.0759%	1.2500%		3.3259%		
Thursday	August 30, 2018	2.1038%	1.2500%		3.3538%	Average	Monthly Rate
Friday	August 31, 2018	2.1138%	1.2500%		3.3638%	3.3235%	0.28%
Saturday	September 1, 2018	2.1138%	1.2500%		3.3638%		
Sunday	September 2, 2018	2.1138%	1.2500%		3.3638%		
Monday	September 3, 2018	2.1095%	1.2500%		3.3595%		
Tuesday	September 4, 2018	2.1203%	1.2500%		3.3703%		
Wednesday	September 5, 2018	2.1205%	1.2500%		3.3705%		
Thursday	September 6, 2018	2.1326%	1.2500%		3.3826%		
Friday	September 7, 2018	2.1310%	1.2500%		3.3810%		
Saturday	September 8, 2018	2.1310%	1.2500%		3.3810%		
Sunday	September 9, 2018	2.1310%	1.2500%		3.3810%		
Monday	September 10, 2018	2.1389%	1.2500%		3.3889%		
Tuesday	September 11, 2018	2.1479%	1.2500%		3.3979%		
Wednesday	September 12, 2018	2.1344%	1.2500%		3.3844%		
Thursday	September 13, 2018	2.1584%	1.2500%		3.4084%		
Friday	September 14, 2018	2.1647%	1.2500%		3.4147%		
Saturday	September 15, 2018	2.1647%	1.2500%		3.4147%		
Sunday	September 16, 2018	2.1647%	1.2500%		3.4147%		
Monday	September 17, 2018	2.1681%	1.2500%		3.4181%		
Tuesday	September 18, 2018	2.1653%	1.2500%		3.4153%		
Wednesday	September 19, 2018	2.1824%	1.2500%		3.4324%		
Thursday	September 20, 2018	2.2122%	1.2500%		3.4622%		
Friday	September 21, 2018	2.2158%	1.2500%		3.4658%		
Saturday	September 22, 2018	2.2158%	1.2500%		3.4658%		
Sunday	September 23, 2018	2.2158%	1.2500%		3.4658%		
Monday	September 24, 2018	2.2182%	1.2500%		3.4682%		
Tuesday	September 25, 2018	2.2301%	1.2500%		3.4801%		
Wednesday	September 26, 2018	2.2422%	1.2500%		3.4922%		
Thursday	September 27, 2018	2.2560%	1.2500%		3.5060%		
Friday	September 28, 2018	2.2606%	1.2500%		3.5106%		
Saturday	September 29, 2018	2.2606%	1.2500%		3.5106%	Average	Monthly Rate
Sunday	September 30, 2018	2.2606%	1.2500%		3.5106%	3.4260%	0.29%

Evergy Missouri West (formerly KCP&L Greater Missouri Operations Company)

9 (A) 2.D (II) - Calculation of the short-term borrowing rate

Day	Date	One Month LIBOR	Applicable Margin	Upfront Fees	Daily Rate		
Monday	October 1, 2018	2.2651%	1.2500%		3.5151%		
Tuesday	October 2, 2018	2.2739%	1.2500%		3.5239%		
Wednesday	October 3, 2018	2.2793%	1.2500%		3.5293%		
Thursday	October 4, 2018	2.2806%	1.2500%		3.5306%		
Friday	October 5, 2018	2.2767%	1.2500%		3.5267%		
Saturday	October 6, 2018	2.2767%	1.2500%		3.5267%		
Sunday	October 7, 2018	2.2767%	1.2500%		3.5267%		
Monday	October 8, 2018	2.2841%	1.2500%		3.5341%		
Tuesday	October 9, 2018	2.2871%	1.2500%		3.5371%		
Wednesday	October 10, 2018	2.2832%	1.2500%		3.5332%		
Thursday	October 11, 2018	2.2795%	1.2500%		3.5295%		
Friday	October 12, 2018	2.2798%	1.2500%		3.5298%		
Saturday	October 13, 2018	2.2798%	1.2500%		3.5298%		
Sunday	October 14, 2018	2.2798%	1.2500%		3.5298%		
Monday	October 15, 2018	2.2895%	1.2500%		3.5395%		
Tuesday	October 16, 2018	2.2871%	1.2500%		3.5371%		
Wednesday	October 17, 2018	2.2820%	1.2500%		3.5320%		
Thursday	October 18, 2018	2.2796%	1.2500%		3.5296%		
Friday	October 19, 2018	2.2819%	1.2500%		3.5319%		
Saturday	October 20, 2018	2.2819%	1.2500%		3.5319%		
Sunday	October 21, 2018	2.2819%	1.2500%		3.5319%		
Monday	October 22, 2018	2.2865%	1.2500%		3.5365%		
Tuesday	October 23, 2018	2.2814%	1.2500%		3.5314%		
Wednesday	October 24, 2018	2.2941%	1.2500%		3.5441%		
Thursday	October 25, 2018	2.2949%	1.2500%		3.5449%		
Friday	October 26, 2018	2.2967%	1.2500%		3.5467%		
Saturday	October 27, 2018	2.2967%	1.2500%		3.5467%		
Sunday	October 28, 2018	2.2967%	1.2500%		3.5467%		
Monday	October 29, 2018	2.3020%	1.2500%		3.5520%		
Tuesday	October 30, 2018	2.2994%	1.2500%		3.5494%	Average	Monthly Rate
Wednesday	October 31, 2018	2.3069%	1.2500%		3.5569%	3.5352%	0.29%
Thursday	November 1, 2018	2.3136%	1.2500%		3.5636%		
Friday	November 2, 2018	2.3179%	1.2500%		3.5679%		
Saturday	November 3, 2018	2.3179%	1.2500%		3.5679%		
Sunday	November 4, 2018	2.3179%	1.2500%		3.5679%		
Monday	November 5, 2018	2.3160%	1.2500%		3.5660%		
Tuesday	November 6, 2018	2.3169%	1.2500%		3.5669%		
Wednesday	November 7, 2018	2.3153%	1.2500%		3.5653%		
Thursday	November 8, 2018	2.3184%	1.2500%		3.5684%		
Friday	November 9, 2018	2.3144%	1.2500%		3.5644%		
Saturday	November 10, 2018	2.3144%	1.2500%		3.5644%		
Sunday	November 11, 2018	2.3144%	1.2500%		3.5644%		
Monday	November 12, 2018	2.3066%	1.2500%		3.5566%		
Tuesday	November 13, 2018	2.3065%	1.2500%		3.5565%		
Wednesday	November 14, 2018	2.3104%	1.2500%		3.5604%		
Thursday	November 15, 2018	2.3025%	1.2500%		3.5525%		
Friday	November 16, 2018	2.3009%	1.2500%		3.5509%		
Saturday	November 17, 2018	2.3009%	1.2500%		3.5509%		
Sunday	November 18, 2018	2.3009%	1.2500%		3.5509%		
Monday	November 19, 2018	2.3003%	1.2500%		3.5503%		
Tuesday	November 20, 2018	2.3055%	1.2500%		3.5555%		
Wednesday	November 21, 2018	2.3151%	1.2500%		3.5651%		
Thursday	November 22, 2018	2.3149%	1.2500%		3.5649%		
Friday	November 23, 2018	2.3219%	1.2500%		3.5719%		
Saturday	November 24, 2018	2.3219%	1.2500%		3.5719%		
Sunday	November 25, 2018	2.3219%	1.2500%		3.5719%		
Monday	November 26, 2018	2.3368%	1.2500%		3.5868%		
Tuesday	November 27, 2018	2.3493%	1.2500%		3.5993%		
Wednesday	November 28, 2018	2.3446%	1.2500%		3.5946%		
Thursday	November 29, 2018	2.3493%	1.2500%		3.5993%	Average	Monthly Rate
Friday	November 30, 2018	2.3469%	1.2500%		3.5969%	3.5678%	0.30%

Evergy Missouri West (formerly KCP&L Greater Missouri Operations Company)

9 (A) 2.D (III) - Identification of any changes in the basis used for determining the short-term borrowing rate

9 (A) 2.D (IV) - If change, copies of the changed basis or identification of where it may be reviewed

None

Evergy Missouri West (formerly KCP&L Greater Missouri Operations Company)

9 (A) 2.E - Any additional information that the commission has ordered

None

9 (A) 3
Workpapers

Evergy Missouri West (formerly KCP&L Greater Missouri Operations Company)
Section 9 True-Ups of RAMs

Summary

23rd Accumulation

Accumulation Period: June 2018 through November 2018

Recovery Period: March 2019 through February 2020

	GMO	
23rd Accumulation	\$ 28,954,580	ER-2019-0198
True-Up Amount (T)	(55,005)	ER-2019-0198
Interest (I)	458,556	ER-2019-0198
Prudence Adjustment Amount (P)	-	
Fuel and Purchased Power Adjustment (FPA)	29,358,131	
23rd Accumulation Recovery	(26,244,839)	
Proposed Adjustment for (Over)/Under Recovery	\$ 3,113,292	
Adjustment/Correction to Current Accumulation - 26th Accumulation	773,499	correction, see 9 (A) 2.B
Adjustment/Correction to Current Accumulation - 26th Accumulation	29,614	correction interest, see 9 (A) 2.B
Total Proposed True-Up Amount (T) for 26th Accumulation	\$ 3,916,405	

Evergy Missouri West (formerly GMO) FAC Accumulation

	Residential	Commercial	Industrial	Streetlights	Total Retail	Wholesale	Total
Jun-18	\$ 3,102,138	\$ 2,159,717	\$ 1,363,372	\$ (15,962)	\$ 6,609,264	\$ 21,622	\$ 6,630,886
Jul-18	2,555,721	1,742,653	1,060,712	12,187	\$ 5,371,273	20,985	\$ 5,392,257
Aug-18	959,601	738,426	440,466	4,955	\$ 2,143,448	8,093	\$ 2,151,541
Sep-18	554,350	434,511	294,054	2,635	\$ 1,285,550	5,249	\$ 1,290,799
Oct-18	1,606,618	1,643,854	1,090,938	7,183	\$ 4,348,593	14,582	\$ 4,363,175
Nov-18	4,117,988	3,031,843	2,019,229	27,393	\$ 9,196,453	25,792	\$ 9,222,245
Total	\$ 12,896,416	\$ 9,751,003	\$ 6,268,771	\$ 38,391	\$ 28,954,580	\$ 96,322	\$ 29,050,903

Evergy Missouri West (formerly GMO) FAC Recovery

Total	Recovery												Total
	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Recovered
Residential	1,259,269	783,893	687,496	921,187	1,290,364	1,318,697	1,167,810	921,224	834,699	1,095,440	1,161,597	1,174,288	12,615,965
Commercial	834,627	752,761	807,397	811,340	1,073,833	1,011,102	934,222	939,818	767,224	849,705	838,446	875,163	10,495,639
Industrial	234,401	251,691	306,078	190,075	335,347	290,706	259,486	301,244	233,136	257,058	243,602	230,411	3,133,235
Total	2,328,297	1,788,345	1,800,972	1,922,603	2,699,544	2,620,504	2,361,518	2,162,286	1,835,059	2,202,204	2,243,646	2,279,861	26,244,839

Non-Large Power Primary Voltage

Commercial	15,640	13,531	13,783	17,861	22,941	24,051	25,623	22,200	15,553	16,051	14,210	15,431	216,876
Industrial	19,252	14,138	13,061	12,425	14,785	17,167	16,595	17,573	13,664	14,156	12,911	13,995	179,721
Total	34,892	27,669	26,844	30,286	37,726	41,218	42,218	39,773	29,217	30,207	27,121	29,426	396,597

Current Period CAF	0.00345	72.0%	Current Period CAF	0.00139	28.7%
Previous Period CAF	0.00134	28.0%	Previous Period CAF	0.00345	71.3%
Annual CAF	0.00479	ER-2019-0198	Annual CAF	0.00484	ER-2019-0413
Current Period CAF %	72.025%		Previous Period CAF %	71.281%	

Non-Large Power Secondary Voltage

Residential	1,259,269	783,893	687,496	921,187	1,290,364	1,318,697	1,167,810	921,224	834,699	1,095,440	1,161,597	1,174,288	12,615,965
Commercial	674,934	581,898	590,300	629,734	785,952	784,467	740,496	687,007	580,223	655,876	659,535	657,965	8,028,389
Industrial	31,680	31,115	31,873	33,436	56,083	39,072	38,571	35,541	32,250	35,179	33,106	34,438	432,344
Total	1,965,884	1,396,906	1,309,669	1,584,357	2,132,400	2,142,236	1,946,877	1,643,771	1,447,172	1,786,496	1,854,239	1,866,690	21,076,698

Current Period CAF	0.00354	72.0%	Current Period CAF	0.00141	28.5%
Previous Period CAF	0.00138	28.0%	Previous Period CAF	0.00354	71.5%
Annual CAF	0.00492	ER-2019-0198	Annual CAF	0.00495	ER-2019-0413
Current Period CAF %	71.951%		Previous Period CAF %	71.515%	

Large Power Primary Voltage

Commercial	72,751	70,819	100,049	76,664	138,038	96,754	25,772	52,983	34,707	38,171	38,748	58,560	804,018
Industrial	67,304	98,133	134,696	52,744	143,891	107,248	52,021	77,211	47,368	71,084	57,104	56,487	965,289
Total	140,055	168,952	234,745	129,408	281,929	204,002	77,793	130,194	82,075	109,255	95,853	115,047	1,769,307

Current Period CAF	0.00231	63.3%	Current Period CAF	0.00098	29.8%
Previous Period CAF	0.00134	36.7%	Previous Period CAF	0.00231	70.2%
Annual CAF	0.00365	ER-2019-0198	Annual CAF	0.00329	ER-2019-0413
Current Period CAF %	63.288%		Previous Period CAF %	70.213%	

Large Power Secondary Voltage

Commercial	71,302	86,512	103,266	87,081	126,902	105,829	84,147	118,952	83,505	91,362	82,146	90,438	1,131,441
Industrial	116,164	108,305	126,448	91,471	120,588	127,219	115,128	134,171	107,958	102,764	105,107	104,146	1,359,472
Total	187,466	194,818	229,713	178,552	247,490	233,048	199,275	253,123	191,463	194,126	187,253	194,585	2,490,913

Current Period CAF	0.00238	63.3%	Current Period CAF	0.00099	29.4%
Previous Period CAF	0.00138	36.7%	Previous Period CAF	0.00238	70.6%
Annual CAF	0.00376	ER-2019-0198	Annual CAF	0.00337	ER-2019-0413
Current Period CAF %	63.298%		Previous Period CAF %	70.623%	

Large Power Substation Voltage

Commercial							42,214	36,162	34,293	31,279	35,422	33,455	212,826
Industrial							32,808	30,913	25,493	27,994	29,119	15,455	161,782
Total	-	-	-	-	-	-	75,022	67,076	59,786	59,273	64,541	48,910	374,608

Current Period CAF	included in Large Power Primary Voltage					Current Period CAF	0.00096	29.4%
Previous Period CAF						Previous Period CAF	0.00231	70.6%
Annual CAF						Annual CAF	0.00327	ER-2019-0413
Current Period CAF %						Previous Period CAF %	70.642%	

Large Power Transmission Voltage

Commercial							15,970	22,514	18,942	16,966	8,384	19,313	102,089
Industrial							4,363	5,836	6,403	5,882	6,254	5,890	34,627
Total	-	-	-	-	-	-	20,333	28,349	25,345	22,848	14,638	25,203	136,716

Current Period CAF	included in Large Power Primary Voltage					Current Period CAF	0.00096	29.4%
Previous Period CAF						Previous Period CAF	0.00231	70.6%
Annual CAF						Annual CAF	0.00327	ER-2019-0413
Current Period CAF %						Previous Period CAF %	70.642%	