

Exhibit No.:
Issue: Fuel Adjustment Clause
Witness: Lisa A. Starkebaum
Type of Exhibit: Direct Testimony
Sponsoring Party: Evergy Missouri West
Case No.: ER-2023-0444
Date Testimony Prepared: June 30, 2023

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2023-0444

DIRECT TESTIMONY

OF

LISA A. STARKEBAUM

ON BEHALF OF

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

**Kansas City, Missouri
June 2023**

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

In the Matter of the Application of Evergy Missouri)
West for Authority to Implement Rate Adjustments) Case No. ER-2023-044
Required by 20 CSR 4240-20.090(8) and the)
Company's Approved Fuel and Purchased Power)
Cost Recovery Mechanism)

AFFIDAVIT OF LISA A. STARKEBAUM

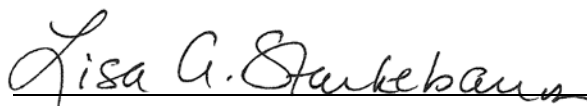
STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Lisa A. Starkebaum, being first duly sworn on her oath, states:

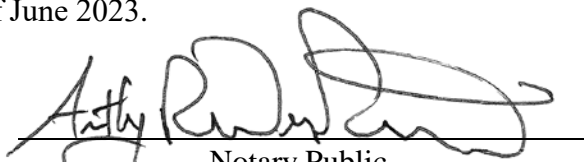
1. My name is Lisa A. Starkebaum. I work in Kansas City, Missouri, and I am employed by Evergy as Manager, Regulatory Affairs.

2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Evergy consisting of fourteen (14) 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.


Lisa A. Starkebaum

Subscribed and sworn to before me this 30th day of June 2023.


Notary Public

My Commission expires:

4/26/2025



DIRECT TESTIMONY

OF

LISA A. STARKEBAUM

Case No. ER-2023-0444

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

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

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

5 A: I am employed by Evergy Metro, Inc. as Manager, Regulatory Affairs for Evergy
6 Metro, Inc. d/b/a Evergy Missouri Metro (“EMM”), Evergy Missouri West, Inc.
7 d/b/a Evergy Missouri West (“EMW”), Evergy Metro, Inc. d/b/a Evergy Kansas
8 Metro (“Evergy Kansas Metro”), and Evergy Kansas Central, Inc. and Evergy
9 South, Inc., collectively d/b/a Evergy Kansas Central (“Evergy Kansas Central”).
10 These are the operating utilities of Evergy, Inc.

11 **Q: On whose behalf are you testifying?**

12 A: I am testifying on behalf of EMW (“Company”).

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

14 A: My responsibilities include the coordination, preparation and review of financial
15 information and schedules associated with the compliance and rider mechanism
16 tariff filings for the above-mentioned operating utilities of Evergy, Inc.

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

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

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

2 A: In 1995, I joined Cerner Corporation as an Accountant in the Finance Department
3 assisting with month-end close and reporting responsibilities. In 1997, I joined
4 Aquila, Inc. (“Aquila”) where I worked in the Financial and Regulatory Reporting
5 group as an Accountant, until joining Regulatory Accounting Services as a
6 Regulatory Analyst in 1999. I was employed by Aquila for a total of 11 years prior
7 to beginning my employment with KCP&L in July 2008 as a part of the acquisition
8 of Aquila, Inc., by Great Plains Energy Incorporated. Since that time, I have held
9 various positions with increasing responsibilities within Regulatory Accounting
10 Services and Regulatory Affairs. As a Lead Analyst in the Regulatory Affairs
11 department, my main areas of responsibility included the preparation of FERC and
12 jurisdictional reporting, and the preparation of rate cases and rate case support for
13 both KCP&L and GMO. In December 2015, I became a Supervisor, Regulatory
14 Affairs responsible for overseeing a team dedicated to compliance reporting and
15 was later promoted to Manager, Regulatory Affairs effective June 2018. In my
16 current position, I am responsible for overseeing various reporting requirements to
17 ensure Evergy is compliant with its jurisdictional rules and regulations, in addition
18 to the implementation of new reporting or commitments resulting from various rate
19 case orders and other regulatory filings. In addition, I oversee the coordination,
20 review and filing of the various rider mechanisms.

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

1 A: Yes, I have testified before the MPSC, the Kansas Corporation Commission
2 (“KCC” or “Commission”) and have provided written testimony before the Public
3 Utilities Commission of Colorado. I have sponsored testimony in Missouri related
4 to various tariff filings involving rider mechanisms. In addition, I have worked
5 closely with both MPSC and KCC Staff on numerous filings and rate case matters.

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

7 A: The purpose of my testimony is to support the Fuel Adjustment Clause (“FAC”)
8 that has been filed by Evergy Missouri West (“Company”). This FAC tariff filing
9 consists of actual fuel and purchased power costs, net of off-system sales revenues
10 incurred by the Company. My testimony supports the rate schedule filed to adjust
11 rates for the adjusted FAC includable costs experienced during the six-month
12 period of December 2022 through May 2023. This six-month period represents the
13 32nd accumulation period under Evergy Missouri West’s FAC, which was
14 originally approved by the Commission in Case No. ER-2007-0004 (“2007 Case”)
15 and modified in Case Nos. ER-2009-0090, ER-2010-0356 (“2010 Case”), ER-
16 2012-0175 (“2012 Case”), ER-2016-0156 (“2016 Case”), ER-2018-0146 (“2018
17 Case”) and ER-2022-0130 (“2022 Case”). The proposed FAC charge for residential
18 customers is a charge of \$0.00856 per kWh. Based on usage of 1,000 kWh per
19 month, the customer will see a monthly charge of \$8.56. This represents a decrease
20 of \$0.29 to an Evergy Missouri West residential customer’s monthly bill compared
21 to the current monthly FAC charge of \$8.85.

22 **Q: Please explain why Evergy Missouri West filed the FAC adjustment rate**
23 **schedules at this time.**

1 A: The Commission’s rule governing fuel and purchased power cost recovery
2 mechanisms for electric utilities – specifically 20 CSR 4240-20.090(8)(A) –
3 requires Evergy Missouri West to make periodic filings to allow the Commission
4 to review the actual net FAC includable costs the Company has incurred and to
5 allow rates to be adjusted, either up or down, to reflect those actual costs. The
6 Commission’s rule requires at least one such review and adjustment each year.
7 Evergy Missouri West’s approved FAC calls for two annual filings – one filing
8 covering the six-month accumulation period running from June through November
9 and another filing covering the accumulation period running from December
10 through May. Any increases or decreases in rates in these filings are then included
11 in the customers’ bills over a subsequent 12-month recovery period.

12 For the 32nd accumulation period covering the period of December 2022
13 through May 2023, Evergy Missouri West’s actual FAC includable costs exceeded
14 the base energy costs included in base rates by approximately \$3.3 million. In
15 accordance with the Commission’s rule and the Company’s approved FAC, Evergy
16 Missouri West has calculated the FAC tariff that provides for a change in rates to
17 recover 95% of those cost changes, or approximately \$3.1 million, plus interest.
18 These amounts are before true-up or any other adjustments.

19 In addition, a true-up filing is being made concurrent with this filing
20 covering the 29th accumulation period of June 2021 through November 2021 and
21 its corresponding recovery period of March 2022 through February 2023. The
22 proposed 29th accumulation period true-up amount results in an over-recovery of
23 \$384,458 to be refunded to customers. However, also included in this true-up filing

1 is a settlement amount related to Missouri West’s 31st accumulation period, Case
2 No. ER-2023-0210. In a Non-Unanimous Stipulation and Agreement filed on June
3 21, 2023, parties agreed to include the amount of the 31st accumulation period Fuel
4 and Purchased Power Adjustment (FPA) disputed balance of \$85,420,087 that does
5 not exceed the 2% Large Power PISA cap. After performing the PISA calculations,
6 the amount in additional FPA that can be included in this 32nd accumulation period
7 is \$45,262,522 which is discussed later in testimony. Therefore; the total 29th
8 accumulation period true-up filing amounts to \$44,878,064 (the 29th accumulation
9 period over-recovery of \$384,458 offset by the additional 31st accumulation period
10 FPA of \$45,262,522).

11 In summary, all of these amounts combined including interest amounting to
12 \$4.5 million result in a proposed 32nd accumulation period FPA of \$52.5 million
13 to be collected from customers. The tariff being submitted with this filing reflects
14 recovery of these FAC-related costs in the fuel adjustment rate effective September
15 1, 2023.

16 **Q: What are some of the drivers impacting this accumulation period?**

17 A: Evergy Missouri West’s Actual Net Energy Costs (“ANEC”), exceeds the base
18 energy costs included in base rates by approximately \$3.3 million. When compared
19 to the prior 31st accumulation period, the ANEC are \$88.9 million lower in the
20 32nd accumulation. This is due to a \$74 million, or 43%, decrease in purchased
21 power expense and a \$41.7 million, or 60%, decrease in fuel costs offset by a \$25.4
22 million decrease in off-system sales revenue. The 32nd accumulation period of
23 December 2022 through May 2023 typically has lower retail load requirements than

1 the previous 31st accumulation period of June through November 2022. In
2 addition, winter weather was 13% warmer than normal by 318 heating degree days
3 and the month of May was 13% warmer than normal by 28 cooling degree days,
4 resulting in a 9% decrease in retail load demand over the 31st accumulation period.
5 This contributed to lower purchased power requirements which were also impacted
6 by lower natural gas prices. For December 2022 through May 2023, the published
7 NYMEX natural gas contract settlement price averaged \$3.51, which is 54% lower
8 than the \$7.59 averaged in 31st accumulation period. Lastly, the decrease in fuel
9 costs driven by 55% less generation, due to generating units offline, and lower
10 natural gas prices contributed to the decrease in off-system sales revenue.

11 **Q: Please explain the settlement mentioned above.**

12 A: In Case No. ER-2023-0210, the Office of Public Counsel (OPC) objected to the
13 Company's semi-annual rate update for the 31st accumulation period. OPC argued
14 that \$85.4 million of the \$104.2 million proposed FPA by Evergy represented
15 extraordinary costs that should be deferred for consideration in the Company's next
16 general rate case. The Commission rejected the Company's proposed tariff revision
17 and ordered the parties to make a filing regarding the amount "not in question"
18 which resulted in a FPA of \$18.8 million. The Commission approved this interim
19 tariff with rates effective May 1, 2023.

20 Evergy Missouri West, MPSC Staff and OPC entered into discussions to
21 determine if the matter could be resolved. In the Non-Unanimous Stipulation and
22 Agreement ("Stipulation") filed on June 21, 2023, parties agree to include an
23 amount of the 31st accumulation period disputed balance of \$85,420,087 that does

1 not exceed the 2% Large Power PISA cap. This results in an additional \$45,262,522
2 of FPA that can be included in the 32nd accumulation period. The remaining
3 \$40,157,565 of FPA will be included for recovery in the 33rd accumulation period
4 with interest included using the interest rate specified in the FAC tariff. As of June
5 30, 2023, the Stipulation has not yet been approved by the Commission. However,
6 the Signatories to the Non-Unanimous Stipulation and Agreement are in agreement
7 that Evergy Missouri West should file this semi-annual FAR filing with the
8 inclusion of the 31st accumulation period FPA amount in dispute as set out in the
9 terms of the Stipulation.

10 **Q: Is there anything else worth noting for this semi-annual FAC filing that**
11 **should be mentioned?**

12 A: Yes, the Company performed the plant in service accounting
13 (“PISA”) calculations to determine the impact, if any, on the Average Overall Rate
14 and Class Average Overall Rate for the Large Power customer class as set forth in
15 section 393.1655 RSMo, rate cap limitations. Base revenues have been updated
16 with the results from the Company’s 2022 Case that became effective January 9,
17 2023. The compound annual growth rate (“CAGR”) cap provisions of section
18 393.1655 RSMo. applied to this FAR filing are 15.0393% for the average overall
19 rate cap and 9.8387% for the class average overall rate cap for Large Power
20 customers. The FAC charge proposed in this filing does not exceed the average
21 overall rate by more than 15.0393% and, as such, the provisions of section
22 393.1655.5 do not affect this FAR filing. In addition, the Company is using
23 projected Large Power sales to calculate a Large Power FAC rate. In accordance

1 with section 393.1655.6 RSMo., the proposed FAC charge applicable to Large
2 Power customers does not exceed 9.8387% of the class average overall rate cap for
3 this rate class and, as such, the provisions of section 393.1655.6 do not affect this
4 FAR filing.

5 **Q: Are there any changes to the calculation of this FAR?**

6 A: Yes, the tariff changes included on Sheet Nos. 127.24 through Sheet 127.34
7 resulting from the 2022 Case have been implemented in this filing. Also, effective
8 January 9, 2023 the Company's Base Factor ("BF") costs per kWh are \$0.02983
9 and the expansion factors by voltage level ("VAF") are: Secondary 1.0766, Primary
10 1.0503, Substation 1.0388 and Transmission 1.0300.

11 **Q: Please describe the Company's process of tracking the impact on ANEC**
12 **related to customers serviced under the Special Incremental Load tariff,**
13 **Schedule SIL.**

14 A: In the EMW general rate proceeding, ER-2022-0130, the Company entered into a
15 Stipulation and Agreement that reiterated and reinforced terms established with the
16 approval of the Special Incremental Load tariff, Schedule SIL in EO-2019-0244.
17 In compliance with these provisions, Evergy Missouri West revised its approach
18 for tracking operational events at Nucor to enhance cost tracking underway since
19 approval of the SIL rate. Starting in November of 2022, Evergy worked directly
20 with Nucor plant operations to determine data available to inform an hourly load
21 forecast for use by the Company in its day ahead resource planning. The revised
22 approach relies on prior year actual hourly load data supplemented by annual
23 outage schedules, monthly planning updates and same-day outage communications

1 from Nucor operations. Specifically, the load estimate is the annual average hourly
2 load for a 24-hour period.

3 EMW established a new procedure to use this hourly load data to establish
4 the Day Ahead demand bid in the Southwest Power Pool (“SPP”) Integrated
5 Market for EMW and track costs pursuant to the event balancing discussed in the
6 Nucor stipulation and agreement in Case No. EO-2019-0244. EMW then adjusted
7 existing Nucor cost tracking spreadsheets to incorporate the cost difference
8 comparing real time to day ahead costs for all hours meeting the established
9 operational conditions. These costs differences, positive or negative are used to
10 adjust the costs before being processed through the FAC. These processes were
11 applied to all hourly loads and used to adjust costs starting in January 2023,
12 consistent with the effective date of rates from the 2022 Case.

13 **Q: What was the impact or result of this new tracking procedure as it relates to**
14 **this 32nd accumulation period?**

15 A: During the 32nd accumulation period of December 2022 through May 2023, the
16 impact of using the Nucor tracking procedure beginning January 2023 through
17 April actuals in this filing results in a net decrease in Nucor’s load costs by \$9,469.
18 This amount was first recorded in the general ledger in the month of May and will
19 be recorded monthly going forward on a one-month lag. Consistent with the
20 language in the Non-Unanimous Stipulation and Agreement reached in Case No.
21 EO-2019-0244, since the analysis for this accumulation period results in a net
22 decrease in Nucor’s load costs, which in turn would result in an increase in costs
23 for non-Nucor customers, the \$9,469 has been removed from the ANEC in the

1 Purchased Power line item and is reflected in the workpaper support included with
2 this filing.

3 **Q: How did you develop the various values used to derive the proposed FARs that**
4 **are shown on Schedule LAS-1?**

5 A: The proposed tariff rates are shown in Schedule LAS-1. The filing made in
6 conjunction with this testimony contains all the information as set in 20 CSR 4240-
7 20.090(8)(2)(A) which supports these proposed rates. In addition, I am submitting
8 a copy of the workpapers that support the determination of the current FAR.

9 **Q: Please describe the impact of the change in costs and how it will affect a typical**
10 **customer.**

11 A: The proposed current period FARs for Evergy Missouri West Large Power and
12 Non-Large Power customers by voltage level is shown below:

Proposed Current Period FARs		
Voltage	Large Power	Non-Large Power
Secondary	\$0.00636	\$0.00636
Primary	\$0.00621	\$0.00621
Substation	\$0.00614	\$0.00614
Transmission	\$0.00609	\$0.00609

13
14 This is the difference between base FAC includable costs and the actual costs
15 incurred by the Company including interest and any adjustments during the 32nd
16 accumulation period of December 2022 through May 2023 and will be included in
17 billed FAC rates over the recovery period running from September 2023 through
18 February 2024.

19 The proposed FAR was calculated in the manner specified in the
20 Company's FAC tariff. Attached to my testimony, as Schedule LAS-1, is a copy

1 of the tariff sheet with the current FAR, the prior period FAR and the total FAR
2 that will be billed to customers over the recovery period. The FAR calculated for
3 the 30th accumulation period has been removed as its recovery period will cease in
4 August 2023. The FAR for the 31st accumulation period is added to the FAR for
5 the current 32nd accumulation period to provide the annual FAR. Thus, given the
6 proposed current FAR calculations, the annual FAR's for Evergy Missouri West
7 Large Power and Non-Large Power customers are shown in the table below:

Proposed Current Annual FARs		
Voltage	Large Power	Non-Large Power
Secondary	\$0.00856	\$0.00856
Primary	\$0.00838	\$0.00838
Substation	\$0.00828	\$0.00828
Transmission	\$0.00822	\$0.00822

8
9 These proposed rates will be billed to customers from September 2023 through
10 February 2024. As stated earlier, based on usage of 1,000 kWh per month, this
11 will result in a monthly FAC charge of \$8.56, a decrease of \$0.29 to an Evergy
12 Missouri West residential customer's monthly bill compared to the current
13 monthly FAC charge of \$8.85.

14 **Q: If the rate schedules filed by Evergy Missouri West are approved or allowed**
15 **to go into effect, what safeguards exist to ensure that the revenues the**
16 **Company bills to its customers do not exceed the fuel and purchased power**
17 **costs that Evergy Missouri West actually incurred during the Accumulation**
18 **Period?**

19 A: Evergy Missouri West's FAC and the Commission's rules provide two mechanisms
20 to ensure that amounts billed to customers do not exceed the Company's actual,

1 prudently incurred fuel and purchased power costs. First, at the end of each
2 recovery period the Company is required to true up the amounts billed to customers
3 through the FAR with the excess fuel and purchased power costs that were actually
4 incurred during the accumulation period to which the FAR applies. Second, the
5 Company's fuel and purchased power costs are subject to periodic prudence
6 reviews to ensure that only prudently incurred fuel and purchased power costs are
7 billed to customers through Evergy Missouri West's FAC. These two mechanisms
8 serve as checks to ensure that the Company's customers pay only the prudently
9 incurred, actual costs of fuel and purchased power used to provide electric service.

10 **Q: Have each of these mechanisms been in effect throughout the FAC process**
11 **since its inception in the 2007 Case?**

12 A: Yes, Evergy Missouri West is currently in its eleventh prudence review, Case No.
13 EO-2023-0277, for the review period of June 2021 through November 2022. MPSC
14 Staff's recommendation is due by August 30, 2023.

15 On September 14, 2022, in the Company's tenth prudence review, Case No.
16 EO-2022-0065, the Commission approved the Non-Unanimous Stipulation and
17 Agreement filed on July 25, 2022 where the Company agreed, with no admission
18 of imprudence, to a one-time FAC adjustment for 2017 vintage expired RECs. The
19 Company refunded \$48,796 plus interest of \$1,968 in the 31st accumulation period
20 filing, Case No. ER-2023-0210.

21 On May 4, 2022, in the Company's ninth prudence review, Case No. EO-
22 2020-0262, the Commission issued its Report and Order finding Evergy was
23 imprudent by not utilizing demand response programs to reduce energy costs for

1 its customers during the review period of June 2018 through November 2019.
2 Therefore, the Company refunded the amount of \$160,892 plus interest of \$10,613
3 in the 30th accumulation period filing, Case No. ER-2023-0011. Also in the ninth
4 prudence review, on January 20, 2021 an Ordered Adjustment for Sibley retirement
5 costs was stipulated by parties amounting to \$1,039,646, or \$984,898 Missouri
6 jurisdictional with 95% sharing applied. Based on the agreement by parties, rather
7 than recovering this amount through the FAC, the Company recorded the
8 \$1,039,646 in retirement costs to the Sibley AAO account for consideration in the
9 2022 general rate case, Case No. ER-2022-0130, and refunded the amount of
10 \$984,898 plus interest of \$53,550 in the 28th accumulation period FAR filing, Case
11 No. ER-2022-0005.

12 In all previous prudence reviews, the MPSC Staff indicated in each of their
13 reports that there were no areas of imprudence identified within the audits with the
14 exception of Staff's recommendation in the Company's third prudence review
15 which was taken before the Commission. However, following the Commission's
16 review, the Commission issued its order stating no indication of imprudence by the
17 Company.

18 In addition, the Company has made 28 true-up filings, all of which were
19 approved by the MPSC. The 29th true-up filing is being made concurrent with this
20 filing covering the 29th accumulation period of June 2021 through November 2021
21 and its corresponding recovery period of March 2022 through February 2023. The
22 Company's calculation of the proposed true-up resulting in an over-recovery for

1 Evergy Missouri West has been included in the calculation of the current proposed
2 tariff change.

3 **Q: What action is Evergy Missouri West requesting from the Commission with**
4 **respect to the rate schedules that the Company has filed?**

5 A: The Company requests the Commission approve the rate schedule to be effective
6 as of September 1, 2023.

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

8 A: Yes, it does.

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

P.S.C. MO. No. 1 1st Revised Sheet No. 127.34

Canceling P.S.C. MO. No. 1 Original Sheet No. 127.34

For Missouri Retail Service Area

FUEL ADJUSTMENT CLAUSE – Rider FAC
 FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE
 (Applicable to Service Provided January 9, 2023 and Thereafter)
 Effective for the Billing Months of September 2023 through February 2024

Accumulation Period Ending: May 2023			
1	Actual Net Energy Cost (ANEC) = (FC+E+PP+TC-OSSR-R)		\$124,442,510
2	Net Base Energy Cost (B)	-	\$121,175,931
	2.1 Base Factor (BF) *		
	2.2 Accumulation Period NSI (S _{AP})		4,324,834,355
3	(ANEC-B)		\$3,266,579
4	Jurisdictional Factor (J)	x	99.46856%
5	(ANEC-B)*J		\$3,249,219
6	Customer Responsibility	x	95%
7	95% *((ANEC-B)*J)		\$3,086,758
8	True-Up Amount (T)	+	\$44,878,064
9	Interest (I)	+	\$4,485,178
10	Prudence Adjustment Amount (P)	+	\$0
11	Fuel and Purchased Power Adjustment (FPA)	=	\$52,450,000
	11.1 PISA Deferral (Sec. 393.1400)		
	11.2 FPA Subject to Recover in True-Up		\$52,450,000
12	Estimated Recovery Period Retail NSI (S _{RP})	÷	8,874,311,293
13	Current Period Fuel Adjustment Rate (FAR)	=	\$0.00591
14	Current Period FAR _{Sec} = FAR x VAF _{Sec}		\$0.00636
15	Prior Period FAR _{Sec}	+	\$0.00220
16	Current Annual FAR _{Sec}	=	\$0.00856
17	Current Period FAR _{Prim} = FAR x VAF _{Prim}		\$0.00621
18	Prior Period FAR _{Prim}	+	\$0.00217
19	Current Annual FAR _{Prim}	=	\$0.00838
20	Current Period FAR _{Sub} = FAR x VAF _{Sub}		\$0.00614
21	Prior Period FAR _{Sub}	+	\$0.00214
22	Current Annual FAR _{Sub}	=	\$0.00828
23	Current Period FAR _{Trans} = FAR x VAF _{Trans}		\$0.00609
24	Prior Period FAR _{Trans}	+	\$0.00213
25	Current Annual FAR _{Trans}	=	\$0.00822
26	VAF _{Sec} = 1.0766		
27	VAF _{Prim} = 1.0503		
28	VAF _{Sub} = 1.0388		
29	VAF _{Trans} = 1.0300		

*From December 6, 2018 through January 8, 2023, the base factor was \$0.02240. Effective January 9, 2023, the base factor is \$0.02983.