Exhibit No.: Issue(s): CCN Conditions Witness: Seoung Joun Won, PhD Sponsoring Party: MoPSC Staff Type of Exhibit: Rebuttal Testimony Case No.: EA-2022-0234 Date Testimony Prepared: October 14, 2022

MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL AND BUSINESS ANALYSIS DIVISION

FINANCIAL ANALYSIS DEPARTMENT

REBUTTAL TESTIMONY

OF

SEOUNG JOUN WON, PhD

NextEra Energy Transmission Southwest, LLC

CASE NO. EA-2022-0234

Jefferson City, Missouri October 2022

1		REBUTTAL TESTIMONY		
2		OF		
3		SEOUNG JOUN WON, PhD		
4		NextEra Energy Transmission Southwest, LLC		
5		CASE NO. EA-2022-0234		
6	Q.	Please state your name and business address.		
7	А.	My name is Seoung Joun Won, PhD and my business address is P.O. Box 360,		
8	Jefferson City, Missouri 65102.			
9	Q.	Who is your employer, and what is your present position?		
10	А.	I am employed by the Missouri Public Service Commission ("Commission") as		
11	a member of Commission Staff ("Staff") and my title is Regulatory Compliance Manager for			
12	the Financial Analysis Department, in the Financial and Business Analysis Division.			
13	Q.	Are you the same Seoung Joun Won, PhD who contributed to the Staff		
14	Recommendation Report filed September 22, 2022 in this case?			
15	А.	Yes.		
16	Q.	What is the purpose of your rebuttal testimony?		
17	А.	I am responding to the Direct Testimony of Evergy witness Darrin R. Ives		
18	regarding his recommended condition (b) related to the financial integrity of the Project.			
19	Q.	What is Mr. Ives's position and concerns related to the financial ability of		
20	NextEra Energy Transmission Southwest, LLC ("NEET SW") in this docket?			
21	А.	Mr. Ives requests that the Commission require NEET SW's parent company to		
22	guarantee the financial performance of NEET SW on this project, for construction as well as			
23	maintenance and operation upon its completion, because NEET SW is supported financially by			

1	its parent company. ¹ Further, Mr. Ives requests that the Commission impose conditions to			
2	ensure the risk of future financial unknowns fall on NEET SW and not on Missouri customers. ²			
3	Q.	What is the condition proposed by Mr. Ives pertaining to financial ability of		
4	NEET SW in this docket?			
5	А.	Mr. Ives proposed a condition in his direct testimony pertaining to financial		
6	ability of NEET SW in this docket as follows: ³			
7 8 9 10 11 12 13 14 15 16		(b) NEET SW's indirect parent company, NEECH, will commit that, for the first forty years of operation of the Wolf Creek-Blackberry Project, NEECH, and its successors or assigns, will provide or secure equity capital injections up to \$10 million per year, as needed to maintain the financial integrity of the Project consistent with an investment-grade credit profile. Following the initial 40-year period, NEET SW and NEECH will review and assess whether this financial commitment remains necessary to maintain the financial integrity of the Project, consistent with an investment-grade credit profile, for the remaining depreciable life of the Project.		
17	Q.	Do you agree with Mr. Ives that the Commission should impose the condition		
18	pertaining to financial ability of NEET SW in this docket as he proposed in his direct testimony?			
19	А.	I agree with Mr. Ives that, as stated in the Application, NextEra Energy Capital		
20	Holdings, Inc. ("NEECH"), will guarantee to provide or secure equity capital injections up to			
21	\$10 million per year, as needed, to maintain the financial integrity of the Project. ⁴ Staff is			
22	waiting for the response of Mr. Ives regarding the reasonableness of the initial 40-year period.			
23	Q.	Does this conclude your rebuttal testimony?		
24	А.	Yes.		

 ¹ Page 11, lines 15-19, Ives's Direct Testimony.
² Page 12, lines 3-9, Ives's Direct Testimony.
³ Pages 13-14, Ives's Direct Testimony.
⁴ Schedule AF-1, Amanda Finnis' Direct Testimony.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

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In the Matter of the Application of NextEra Energy Transmission Southwest, LLC for a Certificate of Public Convenience and Necessity to Construct, Install, Own, Operate, Maintain, and Otherwise Control and Manage a 345 kV Transmission Line and associated facilities in Barton and Jasper Counties, Missouri

Case No. EA-2022-0234

AFFIDAVIT OF SEOUNG JOUN WON, PhD

STATE OF MISSOURI)	
)	SS.
COUNTY OF COLE)	

COMES NOW SEOUNG JOUN WON, PhD and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing Rebuttal Testimony of Seoung Joun Won, PhD; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

SEOUNG JOUN WON, PhD

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 _____/34 day of October 2022.

siellanken

Notary P

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County Commission Expires: April 04, 2025 mmission Number: 12412070