

Exhibit No.:
Issue: COVID Demand Impact on Test
Year, Weather Normalization, AMI
Witness: Albert R. Bass, Jr.
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Evergy Missouri Metro and Evergy
Missouri West
Case No.: ER-2022-0129 / 0130
Date Testimony Prepared: July 13, 2022

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2022-0129 / 0130

REBUTTAL TESTIMONY

OF

ALBERT R. BASS, JR.

ON BEHALF OF

EVERGY MISSOURI METRO and EVERGY MISSOURI WEST

**Kansas City, Missouri
July 2022**

REBUTTAL TESTIMONY

OF

ALBERT R. BASS, JR.

Case No. ER-2022-0129 / 0130

I. INTRODUCTION

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Q: Please state your name and business address.

A: My name is Albert R. Bass, Jr. My business address is 1200 Main, Kansas City, Missouri 64105.

Q: Are you the same Albert R. Bass, Jr. who submitted direct testimony in these dockets on January 7, 2022?

A: Yes.

Q: On whose behalf are you testifying?

A: I am testifying on behalf of Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) (collectively, the “Company”).

Q: What is the purpose of your rebuttal testimony?

A: The purpose of my rebuttal testimony is to respond to Mr. Stahlman’s direct testimony regarding the weather variables used for weather normalizing energy sales, the COVID adjustment to normalized sales, and Mr. Stahlman’s claim that the Company was not responsive to his data requests.

1 **Q: Did Staff use the current National Oceanic and Atmospheric Administration (NOAA)**
2 **30-year climate normals?**

3 A: No.

4 **Q: What time period did Staff use?**

5 A: Staff used the 30-year normal period ending December 31, 2018 and then updated the time
6 period for January 1, 2011 through December 31, 2018.

7 **Q: What is the current NOAA 30-year normal period?**

8 A: In May 2021, NOAA released new climate normals for the period of January 1, 1991 –
9 December 31, 2020.

10 **Q: What is the Company's recommendation?**

11 A: The Company recommends that Staff use the current NOAA climate normal (1991-2020)
12 or move to a 30-year rolling normal with a one-year lag to the current test year.

13 **Q: Should there be an adjustment to the Company's test year for the impact of COVID-**
14 **19?**

15 A: Yes, during the test-year, Kansas City and the surrounding areas experienced an economic
16 shift that has not historically been experienced before as state and local governments
17 responded to COVID-19, forcing business shut-downs and a shift to people working from
18 home. The response to these short-term changes resulted in increases in residential sales
19 and decreases in commercial and industrial sales. The COVID-19 adjustment is necessary
20 to reflect a normalized level of sales by class that is expected to be more representative of
21 the timeframe that rates from this proceeding will be in effect.

1 **Q: Did Staff adjust for COVID-19?**

2 A: No. In DR 477 (Metro) and DR 469 (West) Mr. Stahlman stated “No. Staff did not make
3 a Covid adjustment. Staff used the period of calendar year 2021.” Even though Staff did
4 not make a COVID-19 adjustment, Staff utilized a Google mobility (COVID-19) variable
5 within the residential, large general service, and large power weather normalization
6 models, but made no adjustment to kWh sales. The Google mobility (COVID-19) variable
7 Staff used in the residential, large general service and large power models all had
8 significant T-stat’s and coefficients, indicating that an adjustment is warranted.

9 **Q: Did the Company experience impacts from COVID-19 in 2021?**

10 A: Yes, the Company saw elevated sales in the residential class and decreased sales in the
11 commercial and industrial classes.

12 **Q: Has Staff supported Google mobility data in adjustments in other recent
13 jurisdictional rate cases for COVID-19?**

14 A: Yes. Staff has adjusted for COVID-19 impacts using Google mobility data in both the
15 Ameren¹ and Liberty² cases.

16 **Q: Do you agree with Mr. Stahlman’s assertions that the Company was not responsive
17 to his data requests?**

18 A: No. The Company adequately and timely responded to all data requests by the required
19 deadlines.

¹ Union Electric Company d/b/a Ameren Missouri Case NO. ER-2021-0240

² SPIRE Missouri, INC., d/b/a SPIRE Case NO. GR-2021-0108

1 **Q: Did you provide updated workpapers for the update period ending December 31,**
2 **2021?**

3 A: Yes. I provided completed workpapers based on the Company's update of the test year July
4 1, 2020 through June 30, 2021 updated with known and measurable changes for customer
5 growth, rate switchers, and MEEIA through December 31, 2021.

6 **Q: Why does Mr. Stahlman believe the Company was unresponsive?**

7 A: Mr. Stahlman believes the Company was unresponsive because it did not provide specific
8 workpapers and data needed to update Staff's weather normalization through December
9 31, 2021. The workpapers and data Staff wanted was not needed as part of the Company's
10 update and therefore was not prepared by the Company. The Company did not re-weather
11 normalize the period of January 1, 2021 through December 31, 2021, since the Company's
12 update consisted of updating the test year June 1, 2020 through July 31, 2021, for the
13 changes in customer growth, rate switchers, and MEEIA through December 31, 2021.
14 Based on the Company's past practice, we have not historically weather normalized
15 through the update period. Moreover, the Company is not required to conduct or perform
16 analysis, studies or calculations that do not currently exist.

17 **Q: Why did Staff indicate that it needed additional data?**

18 A: Staff said it needed additional data for weather normalizing the period of January 1, 2021
19 through December 31, 2021, for its update, which was outside of the test year July 1, 2020
20 through June 30, 2021, which the Company updated for known and measurable changes.

1 **Q: Was Staff given sufficient data to transform the AMI data into the equivalent**
2 **“LoadData” table?**

3 A: Yes. Mr. Stahlman states that he was not provided the data needed to update the
4 BilledCal_LR.xls spreadsheet until 5/5/2022. The billing determinates and AMI data
5 needed to update the spreadsheet were provided. The billing determinates were provided
6 in DR 230 (Submitted on 2/28/22) and DR 228 (Submitted on 2/27/22), and the AMI data
7 was provided in DR 250A (Submitted on 4/4/22) and DR 247A (Submitted on 4/4/22). The
8 billing determinates and AMI data were the only two data points needed to update the
9 worksheet.

10 **Q: Did the Company need the BilledCal_LR.xls spreadsheet for the update ending**
11 **December 31, 2021?**

12 A: No. The BilledCal_LR.xls spreadsheet was not needed for the Company’s update. Based
13 on past practice, the Company’s update involved updating the test year, June 1, 2020
14 through July 31, 2021, for change in customer growth, rate switchers, and MEEIA through
15 December 31, 2021.

16 **Q: Did the Company update the BilledCal_LR.xls spreadsheet for Staff?**

17 A: Yes. The Company updated the BilledCal_LR.xls for both MO Metro and MO West for
18 Staff.

19 **Q: Did the Company provide the AMI data in a different format upon the request of**
20 **Staff?**

21 A: Yes. The Company originally provided the updated AMI data in an excel workbook.
22 Working with Staff, the Company agreed to upload the AMI data to the load research
23 access database which links directly to the weather normalization models.

1 **Q: Did the outstanding issues with Mr. Stahlman get resolved?**

2 A: Yes.

3 **Q: Have the Company and Staff agreed on what time period to normalize retail sales for**
4 **the current Evergy rate cases?**

5 A: Yes. The Company reached out to Staff, and both parties indicated that retail sales would
6 be weather-normalized for the update period January 1, 2021 through December 31, 2021.
7 The Company then plans to make known and measurable changes for COVID-19, customer
8 growth, rate switchers, and MEEIA as of May 31, 2022—the true-up date.

9 **Q: Does that conclude your testimony?**

10 A: Yes, it does.

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

AFFIDAVIT OF ALBERT R. BASS, JR.

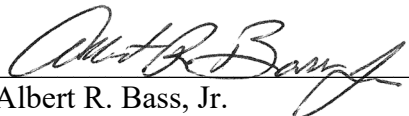
STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Albert R. Bass, Jr., being first duly sworn on his oath, states:

1. My name is Albert R. Bass, Jr. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Sr. Manager of Energy Forecasting and Analytics.

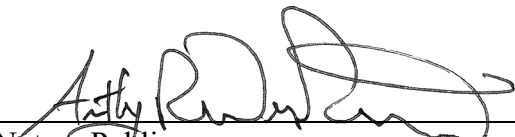
2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of Evergy Missouri Metro and Evergy Missouri West consisting of six (6) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

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.



Albert R. Bass, Jr.

Subscribed and sworn before me this 13th day of July 2022.



Notary Public

My commission expires: 4/26/2025

