

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

In the Matter of the Application of Evergy	)	
Missouri West, Inc. d/b/a Evergy Missouri	)	<b><u>File No. EO-2021-0186</u></b>
West Containing its Semi-Annual Fuel	)	
Adjustment Clause True-Up	)	

**STAFF RECOMMENDATION TO APPROVE TRUE-UP FILING**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Staff Recommendation to Approve True-Up Filing* respectfully states:

1. On December 30, 2020, Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) filed an application concerning its twenty-fourth true-up filing for Recovery Period 24 (“RP24”),<sup>1</sup> as allowed by Commission Rule 20 CSR 4240-20.090(9), in order to remedy an under-collection of \$765,678 from its customers following its Accumulation Period 24.<sup>2</sup>

2. Rule 20 CSR 4240-20.090(9)(D) requires the Commission’s Staff to examine and analyze the information Evergy Missouri West has submitted and to submit a recommendation to the Commission no later than 30 days after Evergy Missouri West made its filing—in this case, no later than January 29, 2021.

3. As explained in Staff’s *Memorandum*, attached hereto as Appendix A and incorporated herein by reference, Staff recommends the Commission approve Evergy Missouri West’s twenty-fourth true-up filing for RP24, during which Evergy Missouri West under-collected \$765,678 from its customers.

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<sup>1</sup> September 1, 2019 through August 31, 2020.

<sup>2</sup> December 1, 2018 through May 31, 2019.

4. Staff reviewed and analyzed the direct testimony, supporting schedules and work papers of Evergy Missouri West witness Lisa A. Starkebaum. Staff has determined that Evergy Missouri West's calculations for the true-up amount for RP24 are correct. The under-collected amount will be collected from customers as it will be included in Evergy Missouri West's proposed changes to its current period fuel adjustment rates in its semi-annual Fuel Adjustment Clause ("FAC") filing in File No. ER-2021-0185 for Accumulation Period 27.<sup>3</sup>

5. Staff has verified that Evergy Missouri West has filed its 2019 annual report and is not delinquent on any assessment. Evergy Missouri West is current on its submission of its Surveillance Monitoring reports as required in 20 CSR 4240-20.090(6), and its periodic monthly reports as required by 20 CSR 4240-20.090(5). With the exception of Evergy Missouri West's proposed changes to its current annual fuel adjustment rates in its semi-annual FAC filing in File No. ER-2021-0185, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

**WHEREFORE**, Staff submits its analysis and recommends that the Commission approve Evergy Missouri West's twenty-fourth true-up filing for RP24 during which Evergy Missouri West under-collected \$765,678 from its customers.

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<sup>3</sup> June 1, 2020 through November 30, 2020.

Respectfully Submitted,

**/s/ Travis J. Pringle**

Travis J. Pringle  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 29<sup>th</sup> day of January 2021, to all parties and/or counsel of record.

**/s/ Travis J. Pringle**

## MEMORANDUM

TO: Missouri Public Service Commission Official Case File  
File No. EO-2021-0186  
Evergy Missouri West, Inc., d/b/a Evergy Missouri West

FROM: Brooke Mastrogiannis, Utility Regulatory Supervisor  
Lisa Wildhaber, Senior Utility Regulatory Auditor  
Cynthia M. Tandy, Senior Utility Regulatory Auditor

DATE: /s/ Brad J. Fortson 01-29-2021      /s/ Travis Pringle 01-29-2021  
Energy Resources Department / Date      Staff Counsel Department / Date

SUBJECT: Staff's Analysis Of and Recommendation Concerning Evergy  
Missouri West, Inc., d/b/a Evergy Missouri West's Twenty-Fourth  
Fuel Adjustment Clause True-up Filing Under the Provisions in  
20 CSR 4240-20.090(9).

DATE: January 29, 2021

### **Recommendation**

The Staff of the Missouri Public Service Commission ("Staff") recommends the Commission approve Evergy Missouri West, Inc., d/b/a Evergy Missouri West's ("Evergy Missouri West") twenty-fourth true-up filing for Recovery Period 24 ("RP24") during which Evergy Missouri West under-collected \$765,678 from its customers.

### **Discussion**

On December 30, 2020, Evergy Missouri West filed with the Commission, along with direct testimony and supporting schedules of Evergy Missouri West witness Lisa A. Starkebaum, its twenty-fourth fuel adjustment clause ("FAC") true-up filing under the provisions in 20 CSR 4240-20.090(9). According to Evergy Missouri West's true-up filing, in the aggregate for RP24 (September 1, 2019 through August 31, 2020), Evergy Missouri West under-collected from its customers \$765,678 which followed its Accumulation Period 24 (December 1, 2018 through May 31, 2019).

Staff reviewed the direct testimony of Evergy Missouri West witness Lisa A. Starkebaum, the supporting schedules Evergy Missouri West provided with its application in this case, and the monthly information Evergy Missouri West submitted to the Commission in accordance with 20 CSR 4240-20.090(9).

Staff notes two items impacting this true-up filing that should be mentioned. As stated in Lisa A. Starkebaum's direct testimony:

First, Case No. ER-2019-0413 covering the 24<sup>th</sup> accumulation period was the second FAR filing under Plant in Service Accounting ("PISA") where the Company elected to make deferrals permitted under Section 393.1400 RSMo effective January 1, 2019. Therefore, in the 24<sup>th</sup> accumulation period FAR filing, the rate cap provisions of section 393.1655 RSMo were applied. The change in the FAC charge proposed in the 24<sup>th</sup> filing did increase the average overall rate for customers by more than 2.21% compound annual growth rate ("CAGR") as described in section 393.1655.5. As stated in the PISA rules, Missouri West removed \$3,533,794 from the FAR filing and included this amount in a separate PISA regulatory asset account that will remain deferred for recovery in a future general rate case. This deferred amount is not subject for recovery in the FAC true-up.

Second, the presentation of materials and supporting documentation provided in this true-up filing reflects the recovery of LP and Non-LP revenue separately by voltage: Primary, Secondary, Substation and Transmission as there were separate FAC billing rates by Substation and Transmission voltages, effective September 2019. There is no recovery revenue shown for Non-Large Power Substation or Non-Large Power Transmission voltages because there are no existing billing rates on those voltages. Substation and Transmission voltages are Large Power only.<sup>1</sup>

### **Staff Review**

Based on its review and analysis of the information Evergy Missouri West filed and submitted for RP24, Staff has determined that Evergy Missouri West's calculations for the true-up amounts for RP24, including the calculation of monthly interest, are correct.

Therefore, Staff recommends the Commission approve Evergy Missouri West's twenty-fourth true-up filing for RP24 during which Evergy Missouri West under-collected \$765,678 from its customers. The under-collected amount will be collected from the customers as it will be included in Evergy Missouri West's proposed changes to its current period fuel adjustment rates in its semi-annual FAC filing in File No. ER-2021-0185, filed on December 30, 2020, for Accumulation Period 27 (June 1, 2020 through November 30, 2020).

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<sup>1</sup> Direct Testimony of Lisa A. Starkebaum, page 5, line 18 through page 6, line 14.

Staff has verified that Evergy Missouri West has filed its 2019 Annual Report and is not delinquent on any assessment. Evergy Missouri West is current on its submission of its Surveillance Monitoring reports as required by 20 CSR 4240-20.090(6), and its monthly reports as required by 20 CSR 4240-20.090(5). With the exception of Evergy Missouri West's proposed changes to its current period fuel adjustment rates in its semi-annual FAC filing in File No. ER-2021-0185, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

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**AFFIDAVIT OF BROOKE MASTROGIANNIS,  
LISA WILDHABER, CYNTHIA M. TANDY**

STATE OF MISSOURI	)	
	)	ss.
COUNTY OF COLE	)	

**COME NOW** Brooke Mastrogiannis, Lisa Wildhaber, Cynthia M. Tandy, and on their oath declares that they are of sound mind and lawful age; that they contributed to the foregoing *Staff Recommendation* in Memorandum form; and that the same is true and correct according to their best knowledge and belief, under penalty of perjury.

Further the Affiants sayeth not.

/s/ Brooke Mastrogiannis  
Brooke Mastrogiannis

/s/ Lisa Wildhaber  
Lisa Wildhaber

/s/ Cynthia M. Tandy  
Cynthia M. Tandy