

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

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)

NOTICE OF ERRATA TO DIRECT TESTIMONY OF DARRIN R. IVES

COME NOW Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“EMW” or the “Company”) by and through their counsel and, for its *Errata to Direct Testimony of Darrin R. Ives* (“Errata”) states as follows:

1. On January 7, 2022, EMW filed its direct testimony in the above-captioned matter, including the direct testimony of Darrin R. Ives (“Ives Direct”). As part of the Ives Direct, EMW included a brief summary of the corporate history that resulted in the creation of EMW.¹ Recently, unintentional errors were discovered in this summary of the corporate history.

2. Attached please find an errata which contains the corrected text, attached hereto as **Exhibit A**.

3. For the convenience of all the parties – a fully corrected version of the Ives Direct with the attached errata inserted is also attached hereto.

WHEREFORE, the Company request the Commission accept this Errata and incorporate the corrections detailed above into EMW’s Ives Direct (as described on Exhibit A), as filed on January 7, 2022.

¹ See, *Ives Direct*, p. 20, ln. 11 through p. 21, ln. 8.

Respectfully submitted,

/s/ Roger W. Steiner

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served upon counsel for all parties on this 6th day of June 2022, by either e-mail or U.S. Mail, postage prepaid.

/s/ Roger W. Steiner

Roger W. Steiner

Errata Sheet to Darrin R. Ives Direct Testimony, No. ER-2022-0130

Darrin R. Ives Direct Testimony from Page 20, Line 11 through Page 21, Line 8 should be replaced with the following (this new text will encompass Page 20, Line 11 through Page 21, Line 11):

Q: Please describe the corporate history that resulted in the creation of Evergy Missouri West.

A: Prior to the merger with GPE, Evergy Missouri West was known as KCP&L Greater Missouri Operations Company (“GMO”). What is now Energy Missouri has a corporate history that dates back to 1916.

1916-1917: Lemuel K. Green, doing business as L.K. Green & Sons, purchased the assets of the former Pleasant Hill Electric Light & Power Co., a small utility which had been operating in the City of Pleasant Hill in Cass County after receiving a franchise from the city in 1905.

1917-1918: L.K. Green & Sons was incorporated as Green Light & Power Co. and received the permission of the Commission to transfer its assets to the new corporation.

1921: The Commission authorized Green Light & Power Co. to reorganize as West Missouri Power Co.

1927: Missouri Public Service Co., a Missouri corporation, succeeds West Missouri Power Co.

1936: Missouri Public Service Corp., a Delaware corporation, succeeds Missouri Public Service Co.

1950: Missouri Public Service Co., a Missouri corporation, merges with and succeeds Missouri Public Service Corp.

1985: UtiliCorp United Inc. becomes the new name of Missouri Public Service Co.

1987: UtiliCorp United Inc., a Delaware corporation, is authorized by the Commission to merge with and succeed UtiliCorp United, Inc., a Missouri corporation.

2002: Aquila, Inc. (“Aquila”) becomes the new name of UtiliCorp United Inc.

2008: Great Plains Energy Incorporated (“GPE”), the parent company of Kansas City Power & Light Company, is authorized by the Commission to acquire Aquila which subsequently changes its name to KCP&L Greater Missouri Operations Company.

2018: GPE and Westar Energy, Inc. merge to form Evergy, Inc. In 2019 GMO is renamed Evergy Missouri West.

Exhibit No.:
Issue: Policy and Overview, Merger
Commitments, Storm Reserve, Major
Maintenance, Sibley Accounting
Authority Order (“AAO”), Property
Tax, Bad Debts, Rate Modernization
and Clean Charge Network (“CCN”)
Witness: Darrin R. Ives
Type of Exhibit: Direct Testimony
Sponsoring Party: Evergy Missouri West
Case No.: ER-2022-0130
Date Testimony Prepared: January 7, 2022

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2022-0130

DIRECT TESTIMONY

OF

DARRIN R. IVES

ON BEHALF OF

EVERGY MISSOURI WEST

**Kansas City, Missouri
January 2022**

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DIRECT TESTIMONY

OF

DARRIN R. IVES

Case No. ER-2022-0130

I. INTRODUCTION

1

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

3 A: My name is Darrin R. Ives. My business address is 1200 Main, Kansas City, Missouri
4 64105.

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

6 A: I am employed by Evergy Metro, Inc. and serve as Vice President – Regulatory Affairs for
7 Evergy Metro, Inc. d/b/a as Evergy Missouri Metro (“Evergy Missouri Metro”), Evergy
8 Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”), Evergy Metro,
9 Inc. d/b/a Evergy Kansas Metro (“Evergy Kansas Metro”), and Evergy Kansas Central,
10 Inc. and Evergy South, Inc., collectively d/b/a as Evergy Kansas Central (“Evergy Kansas
11 Central”) the operating utilities of Evergy, Inc.

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

13 A: I am testifying on behalf of Evergy Missouri West. For the purpose of this testimony, I
14 will refer to Evergy Missouri Metro as “Evergy Missouri West” or “Company”.

15 **Q: What are your responsibilities as the Vice President of Regulatory Affairs?**

16 A: My responsibilities include oversight of the Company’s Regulatory Affairs Department, as
17 well as all aspects of regulatory activities including cost of service, rate design, revenue
18 requirements, regulatory reporting and tariff administration.

1 **Q: Please describe your education, experience and employment history.**

2 A: I graduated from Kansas State University in 1992 with a Bachelor of Science in Business
3 Administration with majors in Accounting and Marketing. I received my Master of
4 Business Administration degree from the University of Missouri-Kansas City in 2001. I
5 am a Certified Public Accountant. From 1992 to 1996, I performed audit services for the
6 public accounting firm Coopers & Lybrand L.L.P. I was first employed by Kansas City
7 Power & Light in 1996 and held positions of progressive responsibility in Accounting
8 Services and was named Assistant Controller in 2007. I served as Assistant Controller until
9 I was named Senior Director – Regulatory Affairs in April 2011. I have held my current
10 position as Vice President – Regulatory Affairs since August 2013.

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

14 A: Yes, I have testified before the Commission and the Kansas Corporation Commission
15 (“KCC”). I have also provided written testimony to the Federal Energy Regulatory
16 Commission and testified before Missouri and Kansas legislative committees.

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

18 A: The purpose of my testimony is to introduce Evergy Missouri West’s requests in this rate
19 proceeding. I will describe how Evergy Missouri West operates, the drivers of our
20 proposed rate increase namely investments to improve reliability, enhance customer
21 service and enable the Company’s transition to cleaner energy resources, and how we have
22 achieved tens of millions of dollars of savings realized through the merger of Westar
23 Energy, Inc. (“Westar”) and Great Plains Energy (“GPE”) and our disciplined cost

1 management. I will also highlight other regulatory proposals we are making, including
 2 several mechanisms to align cost recovery with the investments we are making to operate
 3 our system, and identify the other witnesses providing testimony on behalf of Evergy
 4 Missouri West who address the Company’s individual requests in more detail.

5 **Q: Please introduce the Company’s other witnesses who support Evergy Missouri West’s**
 6 **rate request.**

7 A: Table 1, below, introduces the Company’s other witnesses and the topics they address.

8 **Table 1: Evergy Missouri West Witnesses**

<u>Witness Name:</u>	<u>Topics:</u>
Michael Adams	Property Tax Tracker, Lead/Lag Study
Bruce Akin	Reliability Report, Storm Reserve, Distribution System Investments
Kirkland Andrews	Capital Structure, Cost of Debt, Proposed Return on Equity (“ROE”)
Albert Bass	COVID Demand Impact on Test-Year, Weather Normalization, Advanced Metering Infrastructure (“AMI”)
Ann Bulkley	Cost of Capital, Capital Structure, ROE
Charles Caisley	Customer Service and Experience, Community and COVID-19 Response, Economic Relief Program, Dollar Aid, Time Of Use (“TOU”)
Jim Fluke	Transmission ROE, Transource
Melissa Hardesty	Excess Deferred Income Taxes (“EDIT”), Current Tax and Accumulated Deferred Income Tax (“ADIT”), Potential Federal Tax Increase, Property Tax
Ryan Hledik	Subscription Pricing
Darrin Ives	Policy and Overview, Merger Commitments, Sibley Retirement, Property Tax and Bad Debts Trackers
Ronald Klote	Plant In Service Accounting (“PISA”), Pay As You Save (“PAYS®”) Program, Sibley AAO, COVID AAO, Pension Issues, Storm Reserve, Allocations, Oher Misc. Accounting Adjustments,
Larry Kennedy	Sibley Retirement
Jeffrey Kopp	Decommissioning Studies

Bradley Lutz	Community Solar, Green Power, Tariff Issues, Class Cost Of Service (“CCOS”), TOU, AMI
Marisol Miller	Annualized/Normalized Revenues, CCOS, Tariffs, Rate Design
Linda Nunn	Electric/Steam Allocation Factors, Fuel Adjustment Clause (“FAC”), Line Loss Study, NUCOR, Other Misc. Accounting Adjustments
Eric Peterson	Fuel Expense, Purchased Power Expense, Wholesale Sales, FAC Support
John Spanos	Depreciation Studies
Jessica Tucker	Fuel and Emissions Prices, Fuel and Emissions Costs, Fuel Inventories FAC Support including Hedging
Kimberly Winslow	Rate Modernization Plan, Time of Use Rates, Business Transportation Electrification, Residential Battery Energy Storage Pilot, Low-Income Solar Subscription Pricing Pilot, Green Pricing RECs, Low-Income Weatherization, Market Based Demand Response (“MBDR”), Chapter 13 Variances

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Q: How is the remainder of your testimony organized?

A: The remainder of my testimony is organized in the following sections:

- Section I is an executive summary of my testimony which includes a description of Evergy’s operations and provides an overview of the Company’s proposed rate increase and the major drivers in this case.
- Section II describes Evergy Missouri West’s proposed tracking mechanisms to address regulatory lag associated with property taxes and bad debt expense. I also highlight other requests of the Commission by Evergy Missouri West.
- Section III discusses features of the corporation that have evolved as a result of the 2018 merger of Westar and GPE. This includes a discussion of the commitments Evergy made in the merger approval proceeding, how we have pursued and tracked

1 Missouri West’s electric service territory includes numerous counties in central, western
2 and northwestern Missouri, including the cities of Lee’s Summit, St. Joseph and Sedalia.

3 Evergy’s retail revenues, reflecting service provided to residences and businesses,
4 averaged approximately 90 percent of its total operating revenues over the last three
5 years. Wholesale firm power, bulk power sales, and miscellaneous electric revenues
6 accounted for the remainder of Evergy’s revenues. Like most electric utilities, Evergy is
7 significantly impacted by seasonality with approximately one-third of its retail revenues
8 recorded in the third quarter.

9 To serve its customers, on a combined basis, Evergy Missouri Metro and Evergy
10 Missouri West own approximately 2,700 mega-watts (“MW”) of base load generating
11 capacity and approximately 2,370 MW of peak load and wind generating capacity. This
12 capacity is diversified with outright or joint ownership in four large coal-fired generating
13 stations with a capacity share of almost 2,700 MW, the Wolf Creek nuclear power
14 generating station with capacity of approximately 555 MW, approximately 2,220 MW of
15 natural gas- and oil-fired capacity and approximately 150 MW of wind generating capacity
16 located in Spearville, Kansas. Evergy Missouri Metro and Evergy Missouri West have
17 approximately 1,960 MW of wind generating capacity under contract located in Missouri
18 and Kansas. Evergy Missouri Metro and Evergy Missouri West own or have contracted
19 for other renewable capacity including hydro, solar, and landfill gas totaling 65 MW.

20 On a combined basis, Evergy Missouri Metro and Evergy Missouri West operate
21 and maintain approximately 16,300 circuit miles of distribution lines and approximately
22 2,800 circuit miles of transmission lines to serve customers across their service
23 territory. Evergy Missouri Metro’s share of lines is 5,500 miles of distribution lines and

1 Evergy Missouri West's share is 10,800. Evergy Missouri Metro's share is 944 miles of
2 transmission lines and Evergy Missouri West's share is approximately 1,800.

3 Evergy is one of the largest companies in the region, with just under 5,000
4 employees, including more than 2,600 union employees. These employees are active in
5 the communities we serve, fulfilling our guiding corporate principle of "Improving Life in
6 the Communities We Serve."

7 **Q: Please describe what Evergy Missouri West is requesting in this case.**

8 A: The purpose of this case is to request authority from the Commission to implement a 3.85%
9 increase, excluding fuel, in Evergy Missouri West's general rates for electric service. This
10 requested increase is well below the rate of inflation since the Company's last rate increase.
11 If approved by the Commission, this will be the first base rate increase for Evergy Missouri
12 West's customers in over 5 years. This increase will support recovery of investments
13 improving reliability and grid modernization and enhancing customer service and customer
14 experience which I discuss in more detail in Section IV of my testimony. As I will discuss
15 in Section III of my testimony, the rate request made in this case has been substantially
16 offset through disciplined cost management and the realization of merger benefits as well
17 as benefits from the cost savings from initial generation retirements leading our cleaner
18 energy transition which are expected to grow over time.

19 Our work since the merger between Westar and GPE became effective has allowed
20 us to create substantial savings for our customers which are reflected in this case. Evergy
21 Missouri West is requesting an increase of \$82.9 million for recovery of investments, but
22 has offset that request with more than \$57.5 million in customer savings and cost
23 reductions. Without question, the proposed rate increase would have been significantly

1 higher absent the merger which created significant opportunities to improve and streamline
2 operations, reducing costs to customers.

3 Our commitment to provide customers with exceptional, safe, reliable and
4 affordable utility service requires that we continue to invest in programs that maintain
5 reliability, enhance our customer service and enable the Company's transition to cleaner
6 energy resources. To do this, the Company and its shareholders must have a reasonable
7 opportunity to earn the Commission-authorized return so we can attract the capital
8 necessary to support our prudent investments. The plans described in the sections that
9 follow and throughout this rate filing are designed to achieve these important objectives.

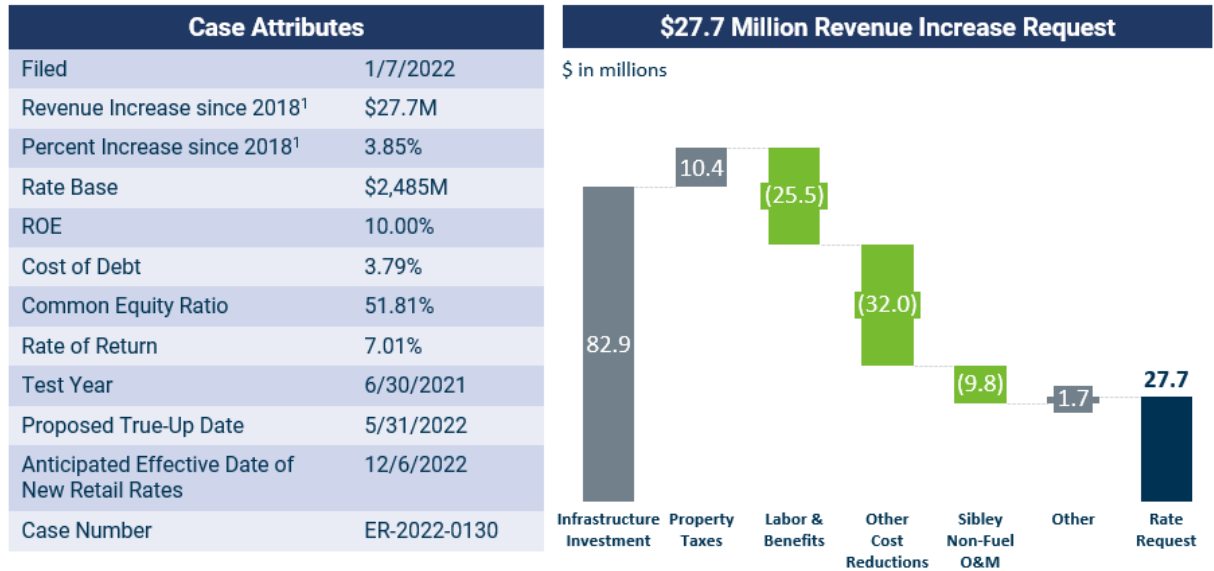
10 **Q: Please provide an overview of Evergy Missouri West's request to increase its rates**
11 **and the key drivers of that request.**

12 **A:** The request, its major drivers and key attributes of the case are highlighted in Figure 1.

1 Figure 1: Rate Request Highlights

Evergy Missouri West Rate Request

- Revenue request includes infrastructure investment to improve reliability, enhance customer service and enable transition to cleaner resources
- Substantially offset by ~\$57M of customer savings and cost reductions



Ongoing savings exceed projections; reduce rate increase request by more than 60%

³ 1. Excludes 95% of net fuel costs, or \$32.1 million; unlike other elements of base rates, fuel costs will be subject to adjustment (up or down) through a fuel recovery mechanism every six months based on incurred costs. Total requested increase including net fuel is \$59.8 million or 8.31%.

2

3 **Q: Please expand on how property taxes contribute to this rate request.**

4 A: The investments we make on behalf of our customers lead to changes in our property tax
 5 liability. As a result, Evergy Missouri West’s property tax expenses have been escalating
 6 over the past five years contributing to the increase request in this case. Evergy Missouri
 7 West is proposing a tracking mechanism to reduce the regulatory lag we experience as a
 8 result of investments in plant that enters service between rate proceedings. These
 9 investments are central to our plans to modernize our system and to operate a reliable
 10 electricity network for the benefit of our customers. I support this proposed property tax
 11 tracker in Section II of my testimony, and it is discussed in greater detail by Evergy
 12 Missouri West witnesses Melissa Hardesty and Michael Adams.

1 **Q: Please expand on how net fuel costs contribute to this rate request.**

2 A: As a result of substantially higher natural gas prices and energy costs, Evergy Missouri
3 West is asking for an additional 4.46% increase for in this rate review. Evergy Missouri
4 West witnesses Eric Peterson and Jessica Tucker discuss Evergy Missouri West's fuel
5 costs.

6 Evergy Missouri West is also asking the Commission to continue to allow it to
7 reflect fuel and purchased power cost increases and decreases in its Fuel Adjustment Clause
8 ("FAC") on customer bills. Company witnesses Linda Nunn, Jessica Tucker and Eric
9 Peterson address requirements for continuing our FAC pursuant to the Code of State
10 Regulations.

11 **Q: What ROE is Evergy Missouri West requesting in this case?**

12 A: We are requesting an ROE of 10.00 percent. Evergy Missouri West witness Ann Bulkley
13 presents in her Direct Testimony the results of her expert analysis of equity costs and
14 recommendations in support of an ROE range of 9.90%-10.50% for Evergy Missouri West.
15 With the Company's proposed capital structure of 51.81% equity and 48.19% debt and
16 actual cost of debt, this results in a requested rate of return of 7.01%. The requested ROE,
17 capital structure and cost of debt are supported by the testimony of Evergy Missouri West
18 witness Kirkland Andrews.

19 **Q: Please expand on how savings achieved by Evergy offset this rate request.**

20 A: As shown in Figure 1, increases in Evergy Missouri West's revenue requirement from
21 infrastructure investments and other cost drivers are partially offset by savings we have
22 achieved in labor costs and non-fuel operating and maintenance ("NFOM") expenses.
23 Evergy has worked hard to capture these efficiencies and will continue to operate our

1 business as efficiently and cost effectively as is practicable. Our future plans to build on
2 the improvements that have been made since the merger are described later in my testimony
3 and in the Evergy Sustainability Transformation Plan (“STP”) previously filed with the
4 Commission.¹

5 **Q: What is the magnitude of rate increase Evergy Missouri West is requesting?**

6 A: As I discussed earlier, Evergy Missouri West is requesting an approximately 3.85%
7 increase in base rates before the impact of the FAC rebase. As noted earlier, Evergy
8 Missouri West is asking for an additional 4.46% increase associated with the rebasing of
9 its FAC in this rate review. If the Commission grants Evergy Missouri West’s request
10 including the FAC rebase this equates to an increase of \$10.66 per month for the typical
11 residential customer, or a daily increase of \$0.35. The remainder of my testimony
12 demonstrates that the investments and strategic initiatives this increase will fund will create
13 benefits for customers that justify the increase in electric charges.

14 **Q. What is the effective date of the Company’s proposed tariffs filed in this case?**

15 A: The revised tariffs we are filing in this case bear an effective date of February 6, 2022. The
16 Commission may suspend this filing up to an additional ten months beyond this effective
17 date. This would place the expected effective date of new rates on or about December 6,
18 2022.

¹ Case No. EO-2021-0032, *In the Matter of an Agreement Between Evergy, Inc., and Elliott Management, Inc.*, Evergy Notice of Filing Sustainability Transformation Plan, Exhibit A (August 13, 2020)(“STP”).

1 Missouri West witness Hardesty describes the property tax tracker mechanism request in
2 her Direct Testimony.

3 **Q: Hasn't this Commission previously denied requests by Evergy for a mechanism to**
4 **track variations in Property Taxes incurred from amounts included in base rates?**

5 A: Yes. Evergy has requested of the Commission in multiple forums on multiple occasions
6 since at least 2012 to provide an appropriate tracking mechanism to address changes in
7 property taxes and the Commission has declined to do so each time.

8 **Q: Why then, do you bring this request in front of the Commission again?**

9 A: There are a few points I would like to make here. First, through my participation in prior
10 cases and my review of the various orders, it is clear to me that the Commission has more
11 strictly applied its consideration of USoA General Instruction No. 7 in evaluating Evergy's
12 prior requests for a property tax tracker than is necessary or appropriate in consideration of
13 granting a property tax tracker. As the Commission has noted correctly on occasion, the
14 criteria for establishment of regulatory assets or liabilities (establishment of a deferral
15 under a tracker) is appropriately addressed and considered in the USoA under Definition
16 31 – Regulatory Assets and Liabilities. The only criteria necessary to be met are that
17 amounts deferred result from the rate actions of regulatory agencies – which would be a
18 Commission order authorizing deferral of costs utilizing the tracker as proposed. The other
19 criteria is that it is probable that the deferral would result in such items being included in a
20 different period for the purpose of developing the rates a utility is authorized to charge (in
21 the case of a regulatory asset) or that in the case of regulatory liabilities, that refunds to
22 customers will be required. To be clear, these are the requirements for the establishment

1 and recording of any regulatory asset or liability by a utility following the chart of accounts
2 under the USoA.

3 While the Commission has frequently, but not always, considered the extraordinary
4 criteria under General Instruction No. 7 in its assessment of appropriateness of regulatory
5 asset and liability deferrals, the USoA is crystal clear that there is no linkage of General
6 Instruction No. 7 to the establishment of regulatory assets and liabilities. This is consistent
7 with the Commission's acknowledgement that it has broad discretion in authorizing
8 deferrals for regulatory assets and liabilities. Therefore, it is clear to me that the
9 Commission has the authority to consider the Company's request for a property tax tracker
10 and is not constrained by prior decisions or by the extraordinary criteria outlined under
11 General Instruction No. 7.

12 Second, as Evergy witness Hardesty describes in her direct testimony, there are
13 several practical considerations that warrant Commission consideration of establishment
14 of a property tax tracker. These considerations are more fully outlined in Ms. Hardesty's
15 testimony but include the benefit to Missourians of property tax payments by Evergy
16 should not be provided by Evergy shareholders. The process in determining assessments
17 and mill levies is outside the control of Evergy, and by its design, occurs in such a way that
18 rates set under the historical construct in Missouri will always result in negative regulatory
19 lag in recovery of property taxes in an investment growth environment. Additionally, it is
20 clearly the policy of the Missouri to encourage utility investment in reliability and grid
21 modernization and to invest in the transition to cleaner energy supply as evidenced by the
22 recent passage of legislation including Senate Bill 564 which includes the authorization to
23 adopt PISA and House Bill 734 which approved Securitization.

1 Third, as supported by the testimony of Company witnesses Adams and Bulkley,
2 there continues to be adoption in jurisdictions across the country of alternative
3 mechanisms, similar to or more supportive than the property tax tracker proposed by
4 Evergy Missouri West in this rate case. Witness Adams describes the national landscape
5 for such mechanisms and witness Bulkley testifies that in her assessment Missouri is at or
6 below average in her assessment of regulatory mechanisms available to peer utilities.

7 As a result of all of these factors, Evergy Missouri West respectfully requests that
8 the Commission reconsider the appropriateness of a tracker for property taxes and exercise
9 its authority to approve Evergy Missouri West's requested property tax tracker in this case.

10 **Q: Why is a tracker appropriate for Evergy Missouri West's bad debt expenses?**

11 A: The reason behind Evergy's request is simple and straightforward. Evergy Missouri
12 West's accounts receivable balances have grown significantly since the beginning of the
13 COVID-19 pandemic. The pandemic has had significant consequences on our customers
14 creating unprecedented hardships for many. Evergy Missouri West witness Charles
15 Caisley describes many actions taken by Evergy in response to the pandemic and outlines
16 some of the resulting impacts on accounts receivable balances and collections. In response
17 to concerns regarding the impacts to Evergy Missouri West of COVID-19, Evergy
18 Missouri West filed in May 6, 2020 a request for accounting authority order to provide for
19 the deferral of impacts from the pandemic. The Commission issued an order in response
20 to that filing acknowledging the extraordinary nature of the COVID-19 pandemic and
21 authorizing deferral accounting for the impacts but the deferral was only authorized
22 through March 31, 2021. Due to the ongoing impacts of COVID-19 and the continued
23 prevalence of elongated payment plans for customers and delays in and modifications made

1 to customer disconnections, the remaining most significant exposure to be addressed is the
2 likelihood that the elevated accounts receivable balances remaining on Evergy Missouri
3 West's books will result in significantly higher bad debt expense in future periods than will
4 be established in rates in this rate case. Due to the extraordinary nature of the COVID-19
5 pandemic and quite simply the unknown factors on how the pandemic will be resolved, it
6 would not be appropriate for that likelihood of higher bad debt expense to be borne by the
7 Company and ultimately its shareholders. Therefore, Evergy Missouri West is requesting
8 the Commission grant its request for a Bad Debt Tracking Mechanism.

9 **Q: Please describe Evergy Missouri West's proposed Bad Debt Expense Tracking**
10 **Mechanism.**

11 A: The mechanism is described in more detail in direct testimony of Evergy Missouri West
12 witness Ronald Klote. In general, there will be a level of Bad Debt expense established in
13 base rates in this case. As a result of the extraordinary nature of the COVID-19 pandemic,
14 Evergy Missouri West respectfully request the Commission approve a two-way tracker for
15 bad debt expense allowing for the deferral of deviations in actual bad debt expense
16 writeoffs from the amount set in base rates. Evergy Missouri West proposes to record the
17 deferral to a regulatory asset if bad debt expense writeoffs incurred are greater than the
18 amount built into rates or to a regulatory liability if bad debt expense writeoffs incurred are
19 less than the amount built into rates. Evergy Missouri West would maintain this deferral
20 until rates are effective in Evergy Missouri West's next general rate case with recovery of
21 the deferral to be addressed in that next general rate case.

22 **Q: Has the COVID-19 pandemic also had an impact on customer usage in the test year?**

1 A: Yes. As discussed by Company witness Albert Bass, COVID-19 had a dramatic impact
2 across our jurisdictions. Our customers' routines and daily lives were interrupted and
3 changed causing an economic shift in customer usage that had simply not been seen
4 historically. Specifically, due to work from home arrangements made by many companies
5 the residential class of customers experienced a dramatic rise in electricity usage. In
6 addition and even more dramatically due to business shutdowns there were significant
7 decreases in the customer electricity usage in the commercial and industrial sectors. As
8 such, the Company employed Google mobility data in order to analyze the test year impacts
9 and make appropriate adjustments to customer usage.

10 **Q: Is Evergy Missouri West requesting other cost recovery regulatory proposals or other**
11 **Commission action you would like to highlight?**

12 A: Yes. I will highlight a number of items but would also note that throughout the direct
13 testimony of Company witnesses there are details supporting the totality of our requests of
14 the Commission in this filing.

15 Evergy Missouri West seeks Commission approval associated with two regulatory
16 accounting mechanisms. First, the Company is requesting a storm reserve to be used to
17 mitigate the impact of sporadic storms that are likely to occur and have a significant
18 financial impact on the Company. Secondly, the Company currently maintains multiple
19 pension and Other Post Employment Benefit ("OPEB") calculations to account for the
20 various reporting requirements that need to be maintained in this area. The Company is
21 requesting that the regulatory calculations be transitioned to an Evergy consolidated
22 calculation to remove the complexity in the calculations and create additional efficiencies
23 in this area. For a more comprehensive discussion of the storm reserve, please see the

1 testimony of Evergy Missouri West witnesses Bruce Akin and Ronald Klote. Evergy
2 Missouri West witness Klote provides more detail on the pension and OPEB requests in
3 his testimony.

4 The Company is requesting a change in the annual process to allow unspent Income
5 Eligible Weatherization funds to be applied to the Company's Dollar-Aide program in
6 order to avoid "roll-over budget" accumulations. For a discussion of the Income Eligible
7 Weatherization change, please see the testimony of Evergy Missouri West witness
8 Kimberly Winslow.

9 Evergy Missouri West is proposing an alternative method of allocating costs among
10 the electric and steam businesses within Evergy Missouri West. For a more comprehensive
11 discussion of this proposed change, please see the testimony of Evergy Missouri West
12 witness Linda Nunn. As discussed in the testimonies of Company witnesses Eric Peterson
13 and Jessica Tucker, fuel prices have both increased dramatically and have been extremely
14 volatile. In response, the Company proposes that the Commission approve Evergy
15 Missouri West's use of physical gas, financial gas, physical power, financial power, and
16 option products (including cross-hedging) as tools (on both the purchase and sale side) for
17 fuel, purchased power, and off system sales hedging and for inclusion in the FAC. These
18 tools will enable Evergy Missouri West to better protect to an expected price of fuel and/or
19 remove a portion of the negative impact on the price of purchased power from significant
20 increases in the cost of fuel. Finally, as discussed in the Direct Testimony of Evergy
21 Missouri West witness Melissa Hardesty, it is possible that federal tax rates will change
22 during the duration of this case. If Congress does enact new legislation that would increase
23 or decrease the federal corporate tax rate before the true-up period in this case, the

1 Company requests that any impact of the rate change when enacted and any amortization
2 of any new deficient or excess deferred taxes generated be included as an adjustment in
3 this case.

4 **Q: Please highlight the customer program and rate design proposals Evergy Missouri**
5 **West is making in this case.**

6 A: The Company is proposing a number of programs and rate design changes. Most
7 significantly the Company also proposing a Rate Modernization Plan. As discussed in
8 more detail in the testimony of Evergy Missouri West witnesses Charles Caisley and
9 Kimberly Winslow, the Rate Modernization Plan includes enhancing and expanding its
10 TOU rates including TOU rates specifically for EV customers and offering programs for
11 subscription pricing, a pre-payment pilot, and in support of distributed energy resources.

12 Evergy Missouri West is also proposing revised business transportation
13 electrification pilot initiatives that include the Commercial Electric Vehicle (“EV”)
14 Charger Rebate Program, Business EV Charging Service Rate and Customer Education
15 and Program Administration program to support the Commercial EV Charger Rebate
16 Program and Business EV Charging Service Rate. As discussed in the testimony of Evergy
17 Missouri West witness Charles Caisley, in the December 22, 2021, MPSC Agenda
18 Meeting, the Commission indicated that it was not going to approve these programs
19 previously filed in dockets ET-2021-0151 and -0269 and that Evergy revise and potentially
20 readdress these three areas in this rate case. For a more comprehensive discussion of these
21 revised programs and tariffs, please see the testimony of Evergy Missouri West witnesses
22 Kimberly Winslow and Bradley Lutz.

1 Finally, as I discuss in more detail later in my testimony, the Company is also
2 proposing a Clean Charge Network rate design.

3 **IV. CORPORATE HISTORY, MERGER BENEFITS, MERGER COMMITMENTS**

4 **Q: What is the purpose of this section of your testimony?**

5 A: In this Section III, I explain how Evergy was formed through the 2018 merger between
6 Westar and GPE. I describe Evergy Missouri West's history, including name changes. In
7 addition, I describe the commitments Evergy made in the merger approval proceeding, how
8 we have pursued and tracked our progress on those commitments, and the benefits the
9 merger has created for our customers and throughout our service territory.

10 *a) Corporate History and Name Change*

11 **Q: Please describe the corporate history that resulted in the creation of Evergy Missouri**
12 **West.**

13 **A: Prior to the merger with GPE, Evergy Missouri West was known as KCP&L Greater**
14 **Missouri Operations Company ("GMO"). What is now Energy Missouri has a corporate**
15 **history that dates back to 1916.**

16 **1916-1917: Lemuel K. Green, doing business as L.K. Green & Sons, purchased the assets**
17 **of the former Pleasant Hill Electric Light & Power Co., a small utility which had been**
18 **operating in the City of Pleasant Hill in Cass County after receiving a franchise from the**
19 **city in 1905.**

20 **1917-1918: L.K. Green & Sons was incorporated as Green Light & Power Co. and**
21 **received the permission of the Commission to transfer its assets to the new corporation.**

22 **1921: The Commission authorized Green Light & Power Co. to reorganize as West**
23 **Missouri Power Co.**

24 **1927: Missouri Public Service Co., a Missouri corporation, succeeds West Missouri Power**
25 **Co.**

26 **1936: Missouri Public Service Corp., a Delaware corporation, succeeds Missouri Public**
27 **Service Co.**

1 1950: Missouri Public Service Co., a Missouri corporation, merges with and succeeds
2 Missouri Public Service Corp.

3 1985: UtiliCorp United Inc. becomes the new name of Missouri Public Service Co.

4 1987: UtiliCorp United Inc., a Delaware corporation, is authorized by the Commission to
5 merge with and succeed UtiliCorp United, Inc., a Missouri corporation.

6 2002: Aquila, Inc. (“Aquila”) becomes the new name of UtiliCorp United Inc.

7 2008: Great Plains Energy Incorporated (“GPE”), the parent company of Kansas City
8 Power & Light Company, is authorized by the Commission to acquire Aquila which
9 subsequently changes its name to KCP&L Greater Missouri Operations Company.

10 2018: GPE and Westar Energy, Inc. merge to form Evergy, Inc. In 2019 GMO is renamed
11 Evergy Missouri West.

12 **Q: Why was Evergy formed?**

13 A: Evergy was formed in 2018 to create a stronger, more sustainable, more reliable, more
14 cost-competitive locally headquartered electric utility. At the time of the merger, Evergy
15 announced three key commitments:

- 16 • Make investments that would increase sustainability, improve the electrical grid and
17 strengthen reliability.
- 18
- 19 • To significantly offset investments in sustainability and reliability through reducing
20 operational costs and improving overall rate competitiveness.
- 21
- 22 • Modernize customer service and enhance customer experience.

23 *b) Merger Commitments: Tracking*

24 **Q: Did Evergy make specific financial, regulatory, or other commitments in the**
25 **proceeding in which the Missouri Commission considered the merger?**

26 A: It did. Evergy made 48 commitments that apply to a variety of functional areas including
27 Regulatory, Finance and Administration, Human Resources, Customer and Community
28 Relations, Facilities, Operations, Legal, and Strategy/Merger Integration.

1 **Q: What is the purpose of these merger commitments?**

2 A: Evergy made these commitments to demonstrate its willingness to collaborate with
3 stakeholders to produce a merger that would provide direct, tangible benefits to customers
4 in the near-term and create long-term, sustainable value.

5 **Q: How can stakeholders be assured that Evergy has honored the commitments it made**
6 **in the merger proceeding?**

7 A: Many of the merger commitments have strict reporting requirements. For example, Evergy
8 committed to an independent third-party management audit report with specific emphasis
9 on corporate cost allocations and affiliate transaction protocols. This report was produced
10 in January 2020 and provided to MPSC Staff.²

11 Other commitments can be easily verified. For example, Evergy committed to
12 maintain its corporate headquarters in Kansas City through the expiration of the then-
13 current lease for the Company's headquarters office, which will happen in October 2032.

14 Some commitments would be triggered by events that have not occurred and are
15 not expected to occur. For example, if Evergy Missouri West's credit rating were to be
16 downgraded to below investment grade by either S&P or Moody's, the Company would
17 be required to notify the Commission within five business days with an explanation of why
18 the credit ratings had been downgraded.

19 **Q: Does Evergy track its own performance with respect to its merger-related**
20 **commitments?**

21 A: Yes, it does. In fact, Evergy established a cross-functional internal team with the specific
22 task of assessing merger impacts, evaluating benefits that flow from the merger, and

² Schumaker and Associates, Management Audit of Affiliate Transactions and Corporate Cost Allocations Involving Evergy Companies, January 28, 2020.

1 ensuring adherence to regulatory requirements. Over time, the team coordinating the effort
2 has turned more focus to Continuous Improvement, but it continues to monitor Evergy's
3 adherence to each commitment made in the merger proceeding.

4 **Q: Have external parties assessed Evergy's methods of tracking its merger commitment**
5 **adherence?**

6 A: Yes. In addition to the 2020 external audit I mentioned above, Evergy hired Concentric
7 Energy Advisors, Inc. ("Concentric") in 2021 to conduct an external review of the
8 Company's management and oversight of merger commitments.

9 **Q: What was Concentric's conclusion?**

10 A: Concentric concluded that Evergy's merger monitoring practices are consistent with
11 industry best practices and are sufficient to ensure appropriate adherence to the
12 commitments made as conditions of the approval of the merger. Concentric's report of its
13 review can be found in Schedule DRI-1.

14 *c) Merger Commitments: Specific to This Rate Filing*

15 **Q: Is this the first rate case for the Company since the merger of Westar and Great Plains**
16 **Energy/Kansas City Power & Light (EM-2018-0012)?**

17 A: Yes, it is.

18 **Q: Are there merger conditions that the Company is required to meet from the Report**
19 **and Order issued in EM-2018-0012?**

20 A: Yes. I will address Condition 19- Transition Costs, Condition 22- Transaction Costs and
21 Condition 45- Employment in the State of Missouri.

22 **Q: What is Condition -19 Transition Costs?**

23 A: The following is wording from the Report and Order:

1 KCP&L and GMO shall be required to attest in all future rate proceedings before
2 the Commission that no transition costs in excess of their corresponding benefits
3 are included in cost of service and rates, and to provide a complete explanation of
4 the procedures used to ensure that transition costs, in excess of their corresponding
5 benefits, are not included in cost of service or rates. This commitment shall be
6 required until all transition costs are fully amortized and corresponding benefits are
7 included in cost of service and rates, and to provide a complete explanation of the
8 procedures used to ensure that transition costs, in excess of their corresponding
9 benefits, are not included in cost of service or rates. This commitment shall be
10 required until all transition costs are fully amortized.

11 **Q: Do you attest that no transition costs in excess of their corresponding benefits are**
12 **included in the Company's cost of service and rates?**

13 A: Yes.

14 **Q: Will you provide a complete explanation of the procedures used to ensure that**
15 **transition costs, in excess of their corresponding benefits, are not included in the**
16 **Company's cost of service and rates?**

17 A: There was a thorough accounting of transition costs compared to benefits in EM-2018-
18 0012. Specific account coding was established to track these costs. Total Evergy merger
19 benefits through September 30, 2021 are approximately \$646 million where Evergy
20 Missouri West transition costs to be recovered in rates were limited to \$7.2 million, to be
21 amortized over ten years. Although merger savings have been tracked and presented at a
22 total Evergy level, the magnitude of the savings achieved as supported by the expense
23 savings reflected in the key drivers in Figure 1 above support our confidence that their
24 contribution easily exceeds \$7.2 million Evergy Missouri West was authorized to amortize
25 over ten years.

1 **Q: Will you continue to address this condition in future rate case proceedings?**

2 A: The Company respectfully requests Commission approval to discontinue addressing this
3 commitment in future rate case proceedings as merger savings clearly exceed the
4 authorized transition costs set forth in EM-2018-0012.

5 **Q: What is Condition 22- Transaction Costs?**

6 A: The following is wording from the Report and Order:

7 GMO and KCP&L commit that they will not seek recovery through recognition in
8 retail rates of transaction costs, that they shall have the burden of proof to clearly
9 identify where all transaction costs related to this Merger are recorded and shall be
10 required to attest in all future rate proceedings before the Commission that none of
11 these costs are included in cost of service and rates, and to provide a complete
12 explanation of the procedures used to ensure that these transaction costs are not
13 included in cost of service or rates. This commitment shall be required until
14 transaction costs of this Merger are no longer on Holdco's books in a test year for
15 KCP&L and/or Westar, as applicable Transaction costs shall be recorded on
16 Holdco's books.

17 **Q: Do you attest that no transaction costs related to this Merger are included in cost of
18 service and rates?**

19 A: Yes.

20 **Q: Please provide a complete explanation of the procedures used to ensure that these
21 transaction costs are not included in cost of service or rates.**

22 A: There was a thorough accounting of transaction costs to accounts that are recorded below
23 the line. Specifically, these costs were recorded to account 426.5 in the FERC system of
24 accounts.

25 **Q: Will you continue to address this condition in future rate case proceeding?**

26 A: We believe this condition has expired as no merger transaction costs are reflected on
27 Evergy's books in the test year for this case. We attest that there will be no additional
28 transaction costs recorded after the test year.

1 **Q: What is Condition- 45 Employment in the State of Missouri?**

2 A: The following is wording from the Report and Order:

3 In their first general rate cases filed after the closing of the Merger, KCP&L and
4 GMO (as applicable) shall provide direct testimony explaining the employment
5 metrics related to the number of full time employees and the average turnover rate
6 along with any material changes to those metrics since the closing of the Merger.
7 This direct testimony shall include a complete description, supported by schedules
8 or work papers as appropriate, of the Merger-related labor and all labor-related
9 efficiency savings that KCP&L and GMO (as applicable) propose to flow through
10 to the benefit of customers in the form of rates that are lower than they would be in
11 the absence of the Merger.

12 **Q: Please explain the employment metrics related to the number of full-time employees**
13 **and the average turnover rate.**

14 A: Table 2, below, details total headcount and the breakdown of Union versus Non-Union
15 personnel at various dates. The turnover rate identifies the number of employees that used
16 several Voluntary Exit Programs versus routine turnover. There were no in-voluntary lay-
17 offs during the period specified in the merger agreement.

1 **Table 2: Employment Metrics**

Headcount

	Non-Union	Union	Total
6/5/2018	2,508	3,249	5,757
1/1/2020	2,394	2,990	5,384
1/1/2021	2,313	2,802	5,115
10/1/2021	2,255	2,650	4,905

Turnover

Voluntary Separation Plan

	Non-Union	Union	Total
2020	177	142	319
2021	67	29	96

Other

	Non-Union	Union	Total
2020	68	155	223
2021	96	186	282

Total

	Non-Union	Union	Total
2020	245	297	542
2021	163	215	378

Annualized Turnover percentage

	Non-Union	Union	Total
2020	10.2%	9.9%	10.1%
2021	9.4%	10.2%	9.9%

2 * *Note* : These data exclude temporary employees

3 **Q: Please identify the Merger-related labor efficiency savings that are reflected in**
 4 **Evergy Missouri West’s proposed rates.**

5 **A:** Labor efficiency savings are highlighted in Table 3, below. These labor efficiency savings
 6 result in rates that are lower than they would have been but for the merger, a material
 7 benefit to customers.

1 **Table 3: Merger-Related Labor Savings**

Jun 5, 2018 - Dec 31, 2019	\$112.5 M
Jan 1, 2020 - Dec 31, 2020	\$111.1 M
Jan 1, 2021 - Sep 30, 2021	\$107.9 M
	<hr/>
	\$331.5 M

2
3 *c) Merger Benefits*

4 **Q: Has the merger produced material benefits for customers?**

5 A: Yes, it has. As I noted earlier, savings resulting from the merger as of September 2021
6 totaled approximately \$646.3 million, which is 58% above planned savings levels. In fact,
7 the planned level of savings over five years following the merger (i.e., 2018-2023) was
8 achieved in the third quarter of this year, approximately 18 months ahead of plan.

9 These savings result from the consolidation of procurement activities and other cost
10 centers, and the implementation of process improvements. Together, these actions have
11 allowed Evergy to achieve synergies and cost savings that Westar and GPE could not
12 generate independent of one another. The merged company has also benefited from the
13 application of best practices that existed independently in both organizations, which has
14 led to additional savings. Finally, the consolidated company has benefited from improved
15 financial management and scale.

16 **Q: Does Evergy expect additional savings to accrue to customers going forward?**

17 A: Yes, it does, provided that we are able to make the investments we have described in
18 Evergy's STP.³ These investments include those to support the continued transition to
19 cleaner energy resources. By 2024, Evergy estimates that it will have in place an overall
20 lower NFOM cost structure that will yield up to \$330 million in annual, sustainable savings

³ Id.

1 over 2018 expense levels.⁴ Note that that updated projections through 2025 show \$345
2 million in annual, sustainable savings.

3 **V. HIGHLIGHTS OF STRATEGIC INVESTMENTS AND THE IMPORTANCE OF**
4 **PISA**

5 **Q: What is PISA?**

6 A: Section 393.1400 RSMo. allows Evergy Missouri West to use plant-in-service accounting,
7 or PISA, to offset a portion of the negative lag associated with capital investments and also
8 requires the Company to limit the growth of its rates to a compound annual growth rate of
9 3.0%. The negative lag inherent in capital investments made it difficult for Evergy, as well
10 as other Missouri electric utilities, to invest at the level needed to accelerate modernization
11 of the electric grid for the benefit of customers. Reducing the negative lag has allowed
12 Evergy to increase investment in its distribution system and other plant with the goal of
13 improving the reliability of the system. PISA enabled these investments which are part of
14 the Company's capital plan which was last filed with the Commission in February 2021.⁵

15 **Q: Please highlight some of the distribution system investments that are part of the**
16 **Company's capital plan and will be supported by PISA?**

17 A: Evergy's distribution investments include:

- 18 • The Lateral Improvement Program
- 19 • Wood Pole Life Extension program
- 20 • The Proactive Cable Replacement/Rehabilitation Program

⁴ *Id.*, p. 6 of 88. Note that these projected savings are based on a 2018 baseline. Savings projections made in the merger proceeding were made on a 2016 baseline.

⁵ *Evergy Missouri West's Report of 2020 Capital Investment*, dated February 26, 2021, Docket No. EO-2019-0045.

- Automation strategy-installation of Communicating Fault Current Indicators and Communicating Reclosers

For a comprehensive discussion of these distribution investments, please see the testimony of Evergy Missouri West witness Bruce Akin.

VI. SIBLEY AAO AND RETIREMENT ISSUES-WEST ISSUE ONLY

Q: What are the issues that the Commission must address in this case regarding the retirement of the coal-fired Sibley Generating Station (“Sibley”)?

A: There are two primary issues to be addressed by the Commission relating to Sibley.

First, in light of the Commission’s October 17, 2019 Report and Order in complaint case No. EC-2019-0200, which required the deferral of amounts in rates established in Evergy Missouri West’s 2018 rate case regarding the Sibley investments, the Commission should address the appropriate resolution of the deferred balances in the regulatory liability recorded by the Company as required in that order. Company witnesses Larry Kennedy and Ronald Klote provide Evergy’s recommended resolution of the deferred balances in their testimony.

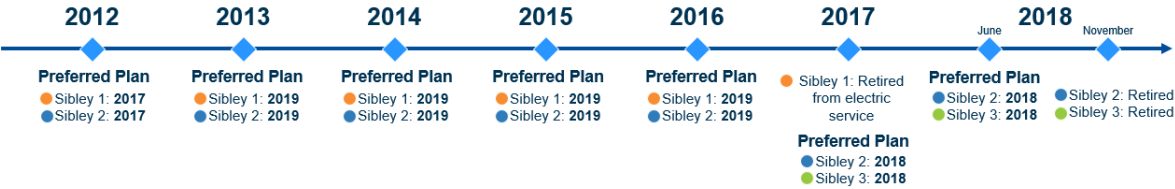
Second, the Commission must address the appropriate recovery in rates of the current unrecovered investment balances of Sibley. As I describe below and is discussed in more detail in the testimony of Mr. Kennedy, the Commission should consider the prudence of the Sibley plant investments at the time they were made and determine the prudence of the decision to retirement Sibley at the time it was made.

Q: When did Evergy Missouri West begin planning to retire Sibley?

A: As shown in Figure 2, since 2012 the retirement of Sibley Units 1 and 2 has been part of the Company’s Preferred Plan established in its Integrated Resource Plan (“IRP”). The

1 retirement of Sibley 3 was announced in mid-2017 and supported with an analysis of the
 2 benefits of retiring the unit beginning in the 2017 IRP. While the exact retirement date
 3 varied, it was clear for many years that Sibley was being evaluated for retirement at a date
 4 earlier than its depreciation expected life.

5 **Figure 2: Sibley IRP Timeline**



6
 7 **Q: Please provide a brief overview of Sibley and the first IRPs where the Company**
 8 **indicated its plans to retire the plant.**

9 **A:** The key events in Sibley’s history are summarized below.

- 10 • Sibley’s three coal-fired units were built in the 1960s: Unit 1 (48 MW in 1960); Unit 2
- 11 (51 MW in 1962); and Unit 3 (364 MW in 1969).
- 12 • Major projects were completed in the early 1990s to extend life of the units for 20 years
- 13 and to modify them to burn low-sulfur coal to comply with environmental regulations.
- 14 • AAOs were granted by Commission to help then-owner Missouri Public Service Co.
- 15 to finance and construct those improvements.
- 16 • In April 2012 Evergy Missouri West (then known as KCP&L Greater Mo. Operations
- 17 Co. or “GMO”) filed its 2012 IRP showing the retirement of Sibley Units 1 and 2 in
- 18 2017 as part of its Preferred Plan.
- 19 • In June 2013 GMO filed its 2013 IRP Annual Update showing the retirement on Sibley
- 20 1 and 2 in 2019 as part of its Preferred Plan.
- 21 • In March 2014 GMO filed its 2014 IRP Annual Update showing the retirement of
- 22 Sibley 1 and 2 in 2019 as part of its Preferred Plan.

- 1 • In January 2015 GMO publicly announced in a press release that Sibley 1 and 2 would
2 stop burning coal by end of 2019.
- 3 • In April 2015 GMO filed its 2015 IRP showing that Sibley Units 1 and 2 would stop
4 burning coal by the end of 2019.
- 5 • In March 2016 GMO filed the Annual Update to its IRP, showing that its Preferred
6 Plan continued to reflect Sibley Units 1 and 2 ceasing to burn coal in 2019.
- 7 • On June 1, 2017, because the Sibley Unit 1 boiler could not operate safely at pressures
8 sufficient to generate electricity, GMO retired Sibley Unit 1. However, the Unit 1
9 boiler remained in service because it still could be used safely to start Unit 3 if needed.

10 **Q: What other events occurred in June 2017 and thereafter regarding Sibley?**

11 A: On June 1, 2017 GMO filed its IRP 2017 Annual Update which included its Preferred Plan
12 that reflected the lowest cost plan from a net present value of revenue requirement
13 (“NPVRR”) perspective. The IRP analysis determined that the retirement by 2019 of
14 Sibley Units 2 and 3 (including the Unit 1 boiler and common plant) and by 2020 of the
15 Lake Road 4/6 Unit (97 MW) should occur because it resulted in an NPVRR savings of
16 \$282 million over the 2015 Triennial IRP Preferred Plan, making it the lowest cost
17 alternative on an expected value basis.⁶ In addition, modeling for the 2017 Annual Update
18 showed that retiring Sibley 3 reduced costs for GMO customers across all 18 modeled
19 scenarios – regardless of load, gas price, or CO2 price assumption.

20 As a result of this analysis and the economic factors that the IRP considered, the
21 Company publicly announced in a June 2, 2017 press release that Sibley Units 2 and 3 (as
22 well as the Sibley Unit 1 boiler and common plant) would be retired by the end of 2018.⁷
23 The Company’s announcement stated that the factors contributing to Sibley’s retirement
24 included: (1) the reduction in wholesale electricity market prices, (2) a reduction in the

⁶ See IRP 2017 Annual Update, § 7.1.5 at 68-69, File No. EO-2017-0230.

⁷ See Exhibit DRI-2.

1 required reserve generating capacity, (3) a decline in near-term capacity needs, (4) the age
2 of the Sibley plants, and (5) expected environmental compliance costs.

3 **Q: Did the Company meet with Staff and the Office of the Public Counsel (“OPC”)**
4 **following this announcement?**

5 A: Yes. On November 16, 2017, GMO met with Staff and OPC to discuss the planned Sibley
6 3 retirement, GMO’s net generating capacity position, and the proposed plan to meet its
7 remaining capacity needs through a multi-year capacity purchase from KCP&L. Based in
8 part on this discussion, GMO decided to issue a Request for Proposal (“RFP”) for a multi-
9 year capacity contract to begin in 2019. Staff and OPC were provided a draft copy of the
10 RFP on November 30, 2017 for comment.

11 **Q: Please summarize the events that transpired in relation to Sibley after this meeting.**

12 A: In January 2018 GMO filed a general rate case that included Sibley in its rate request
13 because the plant was in operation, expected to be in operation at the true-up date in the
14 rate case, and was not expected to retire until the end of 2018, subject to matters affecting
15 future operations, and other risks and uncertainties including unplanned generation
16 outages.

17 In April 2018 GMO filed its 2018 IRP in which the Preferred Plan included the
18 retirement of Sibley 2 and 3 at the end of 2018. However, on September 5, 2018, Unit 3
19 tripped and went off-line due to a turbine vibration event. The Company made a required
20 non-case related EFIS filing with the Commission on September 6, 2018 and a follow-up
21 non-case related EFIS filing on September 12, 2018 indicating that a preliminary analysis
22 showed the likely impact of the turbine vibration was a repair costing over \$200,000. The
23 Company conducted a root cause analysis which included an evaluation of the time and

1 expense to repair the unit. The Company evaluated not only the cost of repair, but whether
2 it made sense for customers to incur that repair cost to operate the unit for three more
3 months. It also evaluated whether other costs might be incurred such as moving the coal
4 stored at the unit. The investigation of the turbine vibration and the damage it caused found
5 that the estimated cost to repair Unit 3 was \$2.21 million. The Company held meetings
6 with Staff and OPC to discuss the forced outage and retirement on November 1, 2018 and
7 later that month. Based upon all of these factors, Evergy Missouri West decided to retire
8 Sibley on November 13, 2018, rather than to make repairs and operate the unit until the
9 end of the year when it was scheduled for retirement.

10 **Q: How did the official Sibley retirement decision coincide with the conclusion of the**
11 **2018 rate case?**

12 A: Sibley was retired shortly after GMO's 2018 rate case, No. ER-2018-0146, was settled in
13 the fall of 2018, with the Commission approving the four stipulations and agreements that
14 resolved both GMO's rate case and Kansas City Power & Light Company's rate case (No.
15 ER-2018-0145) on October 31, 2018.

16 **Q: What happened after the rate case stipulations were approved?**

17 A: In response to the retirement of Sibley, OPC and the Midwest Energy Consumers Group
18 ("MECG") filed a complaint (No. EC-2019-0200) on December 28, 2018 that requested
19 the Commission find the retirement of Sibley to be an "extraordinary" event.

20 The complaint also requested the Commission to authorize an AAO that established
21 a regulatory liability to record the revenue collected in rates for the return on Sibley
22 investments and for non-fuel operations and maintenance costs, taxes, and other costs
23 ("Deferred Sibley Costs").

1 After an evidentiary hearing, the Commission issued a Report and Order (“Sibley
2 Complaint Order”) that granted the relief sought and directed GMO to record the requested
3 regulatory liability regarding the Deferred Sibley Costs.

4 The Commission made no findings regarding the prudence of GMO’s decision to
5 retire Sibley, stating:

6 GMO chose to close the Sibley units, and the prudence of that decision is not at
7 issue in this case. The question of prudence will be addressed in a future general
8 rate case.⁸

9
10 The Commission stressed that “this decision is based solely on the Commission’s
11 consideration of the particular circumstances of this case.”⁹

12 **Q: Does the Sibley Complaint Order’s finding that the retirement of Sibley was**
13 **“extraordinary” have any bearing on the issues in this general rate case which must**
14 **decide the ratemaking to be applied to the regulatory liability from the AAO and**
15 **whether the retirement of Sibley was prudent?**

16 **A:** No. Both the MPSC and the appellate courts have found that a decision in an AAO case
17 to establish either a regulatory asset or a regulatory liability is irrelevant to the decision in
18 a utility’s subsequent rate case.

19 In Missouri Gas Energy v. PSC, 978 S.W.2d 434, 438 (Mo. App. W.D. 1998), the
20 Commission reduced the carrying costs of 10.54% granted in two prior AAOs to 4% and
21 6%, respectively. The utility appealed this AAO carrying cost reduction by the MPSC.
22 The Court of Appeals stated: “The whole idea of AAOs is to defer a final decision on
23 current extraordinary costs until a rate case is in order. At the rate case, the utility is
24 allowed to make a case that the deferred costs should be included, but again there is no

⁸ See Sibley Complaint Order, pp. 13-14.

⁹ Id., p. 14.

1 authority for the proposition put forth here at the PSC is bound by the AAO terms.” Id. at
2 438. The Court of Appeals determined that the “AAOs were not final and were indeed
3 dependent on the further action of a ratemaking case” Id.

4 These statements are consistent with State ex rel. Office of Public Counsel v. PSC,
5 858 S.W.2d 806, 812 (Mo. App. W.D. 1993), where the Court noted that an AAO decision
6 “determined only that the costs of two construction projects were extraordinary and may
7 be deferred.” Whether the deferred costs “would be recovered ... as well as other
8 ratemaking issues would be determined in a later rate case.” Id. The Court quoted the
9 Commission’s AAO order: “All other issues would still remain, including, but not limited
10 to, the prudence of any expenditures, the amount of recovery, if any, whether carrying costs
11 should be recovered, and if there are any offsets to recovery.” Id.

12 In the appeal of the Commission’s Sibley Complaint Order, the Court of Appeals
13 cited both of these cases and others, and concluded that they “have upheld Commission
14 decisions authorizing Accounting Authority Orders which captured extraordinary costs
15 incurred by a regulated utility for consideration in a future rate case.”¹⁰ The Court found
16 that the Sibley Complaint Order “merely requires that Sibley-related savings be held in a
17 suspense account pending Evergy’s next rate case so that those savings can be considered
18 at that time.”¹¹ It also cited the Commission’s language that the prudence of the decision
19 to close Sibley was not at issue in the AAO case, but a question that “will be addressed in
20 a future general rate case”¹²

¹⁰ Office of Public Counsel v. Evergy Mo. West, Inc., 609 S.W.3d 857, 870 (Mo. App. W.D. 2020).

¹¹ Id., p. 872.

¹² Id., p. 865.

1 Therefore, both savings and costs related to the Sibley retirement are properly
2 before the Commission in this case. The prudence standard applied by the Commission,
3 as accepted by the courts, is that a utility's costs are presumed to be prudently incurred.
4 The presumption may be overcome where "a serious doubt" is created as to the prudence
5 of action taken or of an expenditure. If such a serious doubt is present, the utility has the
6 burden of dispelling such doubt and showing that the questioned expenditure or conduct
7 was prudent.

8 **Q: Do you agree with the Commission's view in the Sibley Complaint Order, as affirmed**
9 **by the Court of Appeals, that the decision to retire Sibley was an "extraordinary" for**
10 **purposes of the AAO?**

11 A: No, I do not, as I stated in my rebuttal testimony in that case. However, neither my views
12 nor the decisions in the AAO complaint case are relevant to the issues to be decided in this
13 rate case regarding the reasonableness and the prudence of Sibley's costs and revenues.
14 The key issues in general rate cases relate to allowing the recovery of prudently incurred
15 costs, determining a revenue requirement based on those costs and income during a
16 historical test year, and setting a rate of return. As I discussed above, Commission orders
17 over the past 25 years have stated that nothing in AAO orders are considered findings on
18 the reasonableness of expenditures or their value for ratemaking purposes. The focus of
19 the Commission in this case should be on the prudence of the decision to retire Sibley and
20 its related retirement costs, as discussed by Company witness Larry Kennedy.

1 **Q: With that history and background, do you believe the decision to retire Sibley was**
2 **prudent and reasonable?**

3 A: Yes, the decision to retire was prudent and reasonable. The Sibley retirement was driven
4 by economics, emerging sustainable energy trends, and related considerations at the time
5 the decision was made, as discussed with Commission Staff and OPC. According to the
6 20-year net present value of revenue requirement (NPVRR) analysis conducted under 20
7 CSR 4240-22.060 of the Commission's IRP rule, customers benefited from Sibley's
8 retirement compared to keeping Sibley in-service and from GMO's ability to provide
9 reliable service without Sibley.

10 **Q: Were there significant capital projects required for the continued operation of Sibley**
11 **in the 2018-2021 time period?**

12 A: Yes. The Company estimated that \$54 million in capital costs would have been required
13 for the following investments: submerged flight conveyer, new ash pond, auxiliary boiler,
14 and generator rewind.

15 **Q: Were there additional O&M costs that would have been incurred had the plant**
16 **operated in 2018-2021?**

17 A: Yes. The O&M costs were estimated to be \$111 million (\$28 million per year).

18 **Q: Was the ability to recover these capital expenditures and O&M costs impacted by the**
19 **margin the Company received from the Southwest Power Pool ("SPP") market for**
20 **operating Sibley?**

21 A: Yes. As an example, the 2017 SPP market margin for Sibley 3 was approximately \$5
22 million as compared to a non-fuel O&M budget of \$11M.

1 **Q: Why should the Company recover the Sibley unrecovered plant balance at**
2 **retirement?**

3 A: The Company should be compensated for its investments in Sibley because they were
4 prudently made. Therefore, Evergy Missouri West is entitled to a return on and recovery
5 of the undepreciated plant balance associated with Sibley. The Company should not be
6 penalized for retiring the plant when its analysis showed that its retirement would benefit
7 customers. Such a penalty would discourage utilities from doing the right thing on behalf
8 of their customers.

9 Beginning with the 2012 IRP, each of the Company's analyses resulted in the
10 selection of Preferred Resource Plans that included the retirements of Sibley 1 and 2 based
11 on the primary objective function of reducing customer costs. In the 2017 IRP the
12 retirement of Sibley 3 also indicated significant revenue requirement savings across all
13 modeled scenarios. Given the projected significant customer savings, as well as the age
14 and condition of the units (as demonstrated by forced outages which caused Units 1 and 3
15 to be retired earlier than planned), it was prudent to retire them. Evergy Missouri West
16 witness Larry Kennedy discusses at length in his direct testimony the prudence standard
17 and how the Company's decision to retire Sibley satisfies that standard in light of existing
18 technological, social, and economic trends, and increasingly strict environmental
19 regulation.

1 **VII. RATE STRUCTURE PLANS AND PROPOSED CLEAN CHARGE NETWORK**

2 **RATE DESIGN**

3 **Q: Why is rate structure important?**

4 A: First, rate structure and design is important to ensure that Evergy Missouri West has a
5 reasonable opportunity to recover its necessary cost of doing business. Second, rate design
6 is necessary to ensure fairness among customers; that is, rates must reasonably apportion
7 the Company's overall costs to the various customer categories driving those costs, thereby
8 preventing subsidization between customers. Third, rate design can promote efficient use
9 of resources by providing appropriate price signals to customers. Poorly designed rates
10 may encourage inefficient use of resources. Finally, innovative rate designs can give
11 customers more choice in the manner in which they purchase and use electricity; allowing
12 them to better manage their bills. In addition to enhancing customer satisfaction, this will
13 result in a more efficient and robust electric system.

14 **Q: Does the Rate Modernization Plan being executed by the Company align with the**
15 **discussion of important characteristics of rate structure?**

16 A: Yes it does. Please see the comprehensive discussions of the Rate Modernization Plan in
17 the testimonies of Evergy Missouri West witnesses Charles Caisley, Kimberly Winslow
18 and Bradley Lutz. I won't repeat the objectives and the benefits of the Rate Plan that they
19 articulate, but I do want to emphasize that the Rate Plan is a journey – not a destination. It
20 is expected to flex over time based on Company objectives and needs, customer interest
21 and technological changes. This rate case is Evergy Missouri West's first opportunity to
22 file for additional rate tariffs and programs envisioned in its Rate Plan.

1 **Q: What are the key considerations associated with the rate structure changes and/or**
2 **new programs or rates that Evergy Missouri West proposes in this case?**

3 A: The Company is proposing several changes to its residential and commercial rate structures
4 as well as an expanded portfolio of residential rate and program options. Evergy Missouri
5 West witnesses Kimberly Winslow, Ryan Hledik, Marisol Miller and Bradley Lutz provide
6 more detail on these proposed changes and new program options.

7 I would emphasize that these revised and new rates and programs were developed
8 with three main objectives, in my point of view:

- 9 1. **Enhance customer satisfaction** by giving customers more choices in how they
10 purchase and use their electric service. Evergy Missouri West feels strongly
11 that it be allowed to continue to deploy rate designs in a way that acknowledges
12 the value of customer choice. We have and continue to work hard to understand
13 our customers and provide services beneficial to them. The Rate Plan continues
14 that effort. The enhancement of customer choice is discussed in greater detail
15 by Evergy Missouri West Witness Charles Caisley.
- 16 2. **Better align cost recovery** with Evergy Missouri West's cost structure such
17 that rates reduce the risk of cross-subsidization between and among rate classes.
18 It is important to all stakeholders that these principles stay at the forefront of
19 rate design considerations.
- 20 3. **Encourage efficient use of the system while promoting beneficial**
21 **electrification.** There is no question in my mind that beneficial electrification
22 is an appropriate goal. The Company commitment to sustainable energy is clear

1 and finding ways to leverage this renewable generation is to the benefit of
2 customers and our region.

3 **Q: You indicated that Evergy Missouri West is proposing to structure its residential**
4 **rates in a way that better reflects aligns cost recovery with cost structure. What does**
5 **that mean?**

6 A: A fundamental principle of rate design is that it should produce rates that allocate costs to
7 the customers that create those costs. Generally speaking, if a customer or a group of
8 customers creates a need for system resources that are not applied to the benefit of other
9 customers, those other customers should not share the burden of the costs of such resources.

10 Evergy Missouri West witnesses Bradley Lutz and Kimberly Winslow discuss
11 TOU rates in their testimonies concerning the Rate Plan. TOU rates are designed to
12 incentivize energy consumption in low-cost, off-peak periods by sending price signals to
13 change consumption behavior. This is done by aligning costs. Consumption during costly
14 peak periods is made more expensive and the costs of consuming energy during less-
15 expensive, off-peak periods is made less expensive. This type of rate design aligns the
16 costs of consuming electricity with the usage that drives those costs.

17 **Q: Are there situations in which it is appropriate to deviate from cost causation rate**
18 **design principles?**

19 A: There are situations in which it is appropriate to deviate from this general principle. For
20 example, it may be appropriate to socialize the costs of some public benefit programs such
21 as energy efficiency and low-income customer support mechanisms. In addition, rates that
22 are designed to address public policy priorities may deviate from the general principle of
23 assigning costs to customers based on cost causation. An example of a public policy that

1 may merit deviation is a commitment to support the development of EV infrastructure. A
2 state may determine that it is necessary to socialize some system costs on a limited basis
3 to drive the market for EVs forward.

4 **Q: Please describe your testimony concerning the CCN rate design?**

5 A: In the September 19, 2018 Non-Unanimous Partial Stipulation and Agreement in Case No.
6 ER-2018-0145/0146 the parties agreed to the following:

7 6. CLEAN CHARGE NETWORK (“CCN”)

8 The Signatories agree that those CCN assets not already in KCP&L’s and GMO’s
9 rate bases will be included in their rate bases. KCP&L and GMO agree not to
10 expand the CCN without Commission approval. The Signatories agree that a new
11 customer class for electric vehicle charging stations shall be established. The
12 Signatories agree that no other customer class shall bear any costs related to this
13 service either through base rates or through any rate adjustment mechanism such as
14 a FAC, DSIM or RESRAM. KCP&L and GMO agree that joint and common costs
15 shall be allocated to the electric vehicle charging class consistent with how joint
16 and common costs are allocated to other classes. The Signatories agree that the
17 specimen CCN end user tariffs, attached as Exhibit B, should be approved by the
18 Commission.

19 The portion relevant to my testimony is, “*The Signatories agree that no other customer*
20 *class shall bear any costs related to this service either through base rates or through any*
21 *rate adjustment mechanism such as a FAC, DSIM or RESRAM. KCP&L and GMO agree*
22 *that joint and common costs shall be allocated to the electric vehicle charging class*
23 *consistent with how joint and common costs are allocated to other classes.” Through the*

24 process of preparing and litigating the Evergy Transportation Electrification Portfolio
25 Filing, Case Nos. ET-2021-0151 and -0269, the perspective of the Company and we
26 believe the perspective of the Commission has changed toward EV charging.

27 **Q: What is your evidence of this change in perspective?**

28 A: Transportation Electrification presents a wide range of benefits, including lower costs,
29 greater grid flexibility, reduced emissions, and a variety of local economic benefits. The

1 MPSC has previously acknowledged this and directly cited several of these key benefits in
2 the February 2019 Order of Ameren Missouri’s Charge Ahead filing, noting that:

3 Financial benefits from an EV charging network accrue to both the utility and the
4 ratepayers. Utilities and ratepayers benefit economically from the improved
5 utilization of fixed assets when charging is done in off-peak times. EVs are
6 considered to be a flexible load that can charge during periods when demand is low.
7 The financial benefits to the utility and to the ratepayer from an EV charging
8 network are not merely from the additional electricity sales at the charging stations,
9 but are also obtained through additional electric sales from charging at home and
10 creating more efficient utilization of the electric grid. All ratepayers ultimately will
11 receive those benefits from the spreading of fixed costs over a greater amount of
12 usage creating rates that are lower than if there was less usage.¹³

13 In presenting its case in the ET-2021-0151 and -0269 filing, Evergy demonstrated that
14 Transportation Electrification has the potential to reduce long term costs for all customers
15 by spreading the utility’s fixed costs across a wider base of sales. Cost effectiveness
16 evaluations were presented in the Transportation Electrification filing estimating the net
17 cost or benefit of passenger EV adoption from three perspectives: the Evergy customer,
18 participant (i.e., EV driver), and societal. The results of these evaluations show net benefits
19 from all perspectives including a customer benefit estimated at approximately \$600 per EV
20 in the Missouri Metro jurisdiction and \$335 per EV in Missouri West.¹⁴ The
21 Transportation Electrification Portfolio Filing Report goes on to detail benefits related to
22 increased grid flexibility, reduced emissions, and economic benefits. All benefits to be
23 shared by EV drivers and non-EV drivers alike. For these reasons Evergy requests the
24 concept of isolating EV costs to the EV class be reconsidered.

¹³ No. ET-2018-0132, Report and Order,” pp. 16-17 (February 6, 2019).

¹⁴ Evergy Transportation Electrification Portfolio Filing Report at 7, No. ET-2021-0151 (February 15, 2021)

1 **Q: Did the Company prepare its cost studies with a distinct CCN class?**

2 A: Yes. The direct testimony of Company witness Marisol E. Miller details those efforts. The
3 studies show that at the current time the CCN class is not covering its cost to serve.

4 **Q: In proposing new rates for this case, was the cost recovery corrected?**

5 A: No. The amount of increase required to cover all costs would be extreme, well above what
6 would be considered a reasonable increase. It is likely the resulting price would render EV
7 charging cost prohibitive. Instead Evergy Missouri West applied an increase of 10.5%
8 (approximately 127% of the jurisdictional rate increase) to the CCN class.

9 **Q: Is this an example of a situations in which it is appropriate to deviate from cost
10 causation rate design principles mentioned earlier?**

11 A: Yes. EV charging rates have the ability to support electrification efforts leveraging clean
12 energy sources. I would contend EV rates are designed to address public policy priorities
13 and should deviate from the general principle of assigning costs to customers based on cost
14 causation.

15 **VIII. CONCLUSION**

16 **Q: Please summarize the key elements of your testimony.**

17 A: Evergy Missouri West remains committed to providing exceptional safe, reliable, and
18 affordable utility service to our customers. We have worked hard to deliver value, and
19 choices, to our customers. Since the merger of GPE and Westar, we have achieved for
20 Evergy Missouri West customers more than \$57.5 million in savings and cost reductions
21 reflected in this case through disciplined cost management and the realization of merger
22 benefits including realizing the cost savings from initial generation retirements leading our
23 cleaner energy transition. This request is well below the rate of inflation since the

1 Company's last rate case and without question, would have been significantly higher absent
2 the merger. As I have described throughout my testimony, we continue to make
3 investments in programs and initiatives that are intended to maintain and improve
4 reliability, enhance customer service and give customers more choice in their electric rates,
5 and continue to transition the Company's generation fleet to cleaner, more sustainable
6 sources of energy at the appropriate pace to ensure affordability.

7 Making appropriate investments to achieve these goals requires that Evergy
8 Missouri West has adequate access to capital. The regulatory mechanisms proposed in this
9 case are specifically designed to provide such access. These mechanisms include a
10 reasonable ROE and capital structure, but also tracker mechanisms that will reduce the
11 regulatory lag between when Evergy Missouri West incurs certain costs and when those
12 costs are recovered. These mechanisms will provide a foundation on which Evergy
13 Missouri West will execute its strategic plans for the future.

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

15 **A:** Yes, it does.

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

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 DARRIN R. IVES


STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Darrin R. Ives, being first duly sworn on his oath, states:

1. My name is Darrin R. Ives. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Vice President – Regulatory Affairs.

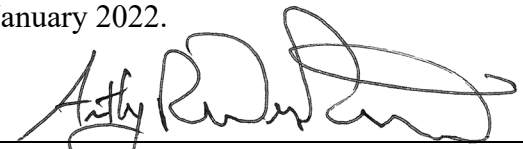
2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Evergy Missouri West consisting of forty-six (46) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

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.



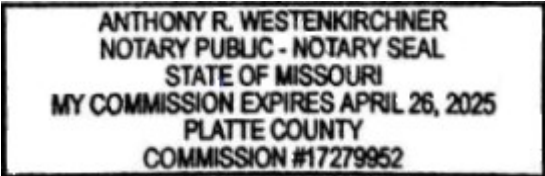
Darrin R. Ives

Subscribed and sworn before me this 7th day of January 2022.



Notary Public

My commission expires: 4/26/2025



Evergy’s Adherence to Merger Commitments

CONCENTRIC REVIEW, PREPARED OCTOBER 2021

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I. EXECUTIVE SUMMARY

This memorandum documents the results of Concentric’s review of Evergy, Inc.’s management and oversight of the commitments made as conditions of the approval of the merger between Great Plains Energy and Westar Energy, Inc by Kansas and Missouri regulators.

Concentric conducted a review of each merger commitment, the tracking mechanisms used to monitor and report progress, and the executive review and oversight processes in place to ensure that Evergy, Inc. complies with all commitments and regulatory requirements pertaining to the merger. The commitments range in topic from human resources to finance to operational matters. Our conclusion is that Evergy’s practical and methodical approach to tracking merger commitments have ensured that benefits have materialized for customers and other stakeholders throughout service territories in Kansas and Missouri.

Concentric’s review indicates that Evergy’s approach is appropriate to ensure full compliance and is consistent with industry best practices.

II. INTRODUCTION

On August 31, 2017, Great Plains Energy (GPE) Kansas City Power & Light Company (“KCPL”), KCP&L Greater Missouri Operations Company, and Westar Energy, Inc. filed a joint application seeking approval regulators in Missouri and Kansas for the merger between Westar and GPE. Evergy, Inc., the resulting holding company, continues to operate investor-owned utilities in Kansas and Missouri. The merger was approved by the Missouri Public Service Commission (MPSC) in May 2018¹ conditioned on 48 merger commitments and associated conditions. The Kansas Corporation Commission (KCC) approved the merger the same day,² contingent on 55 merger commitments and conditions.

¹ Missouri Public Service Commission File No. EM-2018-0012, *In the Matter of the Application of Great Plains Energy Incorporated for Approval of its Merger with Westar Energy, Inc.* (MO Merger Proceeding), Report and Order (Issued May 24, 2018) (MPSC Merger Approval Order).

² Kansas Corporation Commission Docket No. 18-KCPE-095-MER, *In the Matter of the Application of Great Plains Energy Incorporated, Kansas City Power & Light Company, and Westar Energy, Inc. for Approval of the Merger of Westar Energy, Inc. and Great Plains Energy Incorporated*, Order Approving Merger (May 24, 2018).



This memo was prepared at the request of Evergy Missouri West, Inc. and Evergy Missouri Metro, Inc. (referred to collectively herein as Evergy or the Company).³ Specifically, Evergy requested that Concentric document our assessment of Evergy's implementation and progress-tracking of merger commitments made in Missouri Docket No. EM-2018-0012.

Concentric's review and conclusions are described in the sections that follow. Section III describes the methodology Concentric applied in conducting our review, which included a review of documentation, interviews with select Evergy leaders responsible for ensuring compliance with regulatory mandates, and validation of the executive review and oversight that guide the Company's practices with respect to merger commitments.

III. CONCENTRIC'S REVIEW OF EVERGY'S MERGER COMMITMENT ADHERENCE

Concentric has deep expertise in utility mergers and acquisitions. We have provided regulatory advisory expertise and support on a variety of transactions in the regulated utility industry. Our expertise included the design of merger commitments that are crafted to ensure that a merger meets or exceeds established policy and/or statutory requirements that are intended to protect the public interest.

Concentric is familiar with the merger standards that have been established by the MPSC. From our work supporting utility sector consolidation in the State, we have a detailed understanding of the issues that have concerned the MPSC in its deliberation on merger provisions and overall structure. In that 2018 merger proceeding Concentric provided support in the development of the merger commitments. We have a comprehensive understanding of the interests of the parties and the form and structure of the resulting commitments.

This experience served as a foundation for Concentric's review of the mechanisms Evergy has created to monitor the commitments the Company made in the course of the merger proceeding. It allowed Concentric to accelerate the review and focus particular emphasis on aspects of the merger that are of significant interest to customers, MPSC Regulatory Staff (Staff), and other stakeholders.

³ Evergy Missouri West is an integrated, regulated utility that provides electricity to customers in Missouri. Evergy Metro, Inc. is an integrated, regulated electric utility that provides electricity to customers in the states of Missouri and Kansas.



Concentric’s review encompassed an evaluation of the Company’s merger commitment monitoring structures, including the work of Evergy’s internal organization that was tasked with assessing merger impacts, evaluating benefits the merger has created, and ensuring adherence to regulatory requirements. Concentric reviewed these mechanisms critically to ensure that they are applied consistently to commitments that apply to all Evergy departments, all aspects of the firm’s operations. In this review, we interviewed senior management and line personnel responsible for accounting, management, operations, Human Resources, and other key features of business operations. These discussions with Evergy personnel were supported by a review of extensive documentation (i.e., meeting agendas, minutes, Internal Audit reports on merger tracking mechanisms, periodic reports made to the MPSC, etc.) that describe and codify internal and external reporting related to the various commitments.

IV. EXECUTION AND TRACKING

Following the approval of the merger by regulators in Missouri and Kansas, Evergy established an internal organization that was initially called Integration Success. The team was tasked with several accountabilities, which included tracking merger benefits and monitoring progress toward the obligations established by regulatory orders and in formal merger commitments. The team that was focused on Integration Success, which is now officially called Continuous Improvement, had a core staff with support from a cross-functional team comprised of individuals from various corporate organizations. Each commitment was assigned to a specific corporate representative accountable for tracking adherence and reporting status on an ongoing basis to Evergy leaders.

The team focused on Integration Success met on a biweekly basis beginning in 2018 to review activities and resources and to plan and verify reporting on various merger commitments. After initial efforts focused on short-term obligations were complete, they shifted their meeting cadence to monthly meetings, which continue today among Regulatory personnel with updates to the Continuous Improvement team.

The team’s activities and practices are consistent with industry standards for tracking progress and ensuring compliance with merger approval conditions.

Merger Commitments

Evergy has organized and tracked merger commitments by category, which generally align to specific Evergy business organizations. These categories are reviewed in the sections that follow,



with specific descriptions of notable achievements and identification of activity and progress that continues to be made today.

Human Resources

Human Resources merger commitments apply to operational staffing requirements such as the tenure of corporate executive leadership, maintenance of compensation and benefits of utility employees for a minimum of two years following merger close, a prohibition on involuntary severance programs, and adherence to collective bargaining agreements.

Several Human Resources commitments have been completed or no longer apply.⁴

Commitments that remain in effect are being tracked and monitored effectively to ensure compliance with regulatory requirements.

Customer & Community Relations

Customer and Community Relations merger commitments apply primarily to charitable giving and Corporate Social Responsibility, customer assistance program funding, and other customer programs. The Integration Success team has worked closely with subject matter experts from Evergy's Accounting and Finance departments to ensure timely payments are made to applicable charitable organizations and to fund customer programs specified by the MPSC.

Evergy reports made annually to the MPSC, MPSC Staff, and the Office of Public Counsel (OPC) provide appropriate description of the spending by programs that benefit customers through weatherization and energy efficiency programs. Concentric's review has concluded that Evergy's corporate giving commitments are being tracked and monitored effectively to ensure compliance with regulatory requirements.

Facilities

There are only two Facilities commitments: (1) Evergy's corporate headquarters is to remain in Kansas City, and the Company is to honor its existing lease for its current headquarters location, and (2) Evergy will maintain the current Westar Topeka downtown headquarters building at 800-818 South Kansas Avenue in Topeka, KS for its Kansas headquarters.

⁴ *E.g.*, Evergy committed to honor collective bargaining contracts that existed at the time of the merger close. Evergy is in the middle of negotiations on a new agreement, with the hope of executing in 2021. A new agreement will effectively retire the applicable commitment.



Evergy remains in compliance with both commitments. In fact, the Company has reached an agreement to purchase the Topeka, KS headquarters location as of the expiration of the current lease in 2023.

Operations

The MPSC approved seven Operations commitments focused on service quality levels (including customer service quality indices), reliability, and assurances that power costs would not rise as a result of the merger.

Evergy provides monthly reports to MPSC Staff to this day to document the status of performance on most Operations merger commitments that remain in effect today.⁵ The exception is the requirement that Evergy demonstrate that fuel and purchased power costs not rise as a consequence of the Merger. MPSC Staff and other stakeholders are able to explore the Company's performance on fuel and purchased power costs in the context of periodic Fuel Adjustment Clause calibration proceedings.

The monthly reports Evergy provides to MPSC Staff appropriately capture the Company's Operations performance and provide confidence that the GPE-Westar merger has not led to a deterioration in service quality, reliability, or associated metrics.

Evergy's adherence to the merger commitments meets or exceeds the industry standard for keeping regulators and other stakeholders informed of Operational performance. In fact, some of the reporting takes place so frequently that it creates an administrative burden on the Company, and thus creates avoidable costs to customers. In particular, the last Operations merger commitment states that Evergy "shall provide to Staff a current organizational chart, illustrating the positions and names of management employees that have customer service responsibilities, and this information shall be provided on a monthly basis thereafter."⁶ This requirement entails considerable effort for Evergy to produce and may provide de minimis value to MPSC Staff. This requirement exceeds industry norms for ensuring that regulatory Staff are kept apprised of staffing changes in customer service organizations. Nevertheless, Evergy has met maintained adherence to this requirement since the merger was approved.

⁵ One Operations commitment established a reporting requirement concerning customer satisfaction with front-line customer service personnel and utility interactions. This requirement applied for two years following the close of the merger. The final report under this commitment was made in the form of a report on survey results and was provided to regulators on August 18, 2020.

⁶ MO Merger Proceeding, Exhibit A to the Stipulation and Agreement (January 12, 2018), p. 14, Commitment 36.



Finance & Administration

Evergy agreed to 39 Finance and Administration merger commitments. Six of these commitments require specific responses in the case that the rating on Evergy's senior secured debt is downgraded to below investment grade. This situation has not occurred, and there is no indication or expectation that this condition could materialize in the near future given current business and market conditions.

Ten additional commitments pertain to business relationships and transactions among corporate affiliates within the Evergy, Inc. holding company. The requirements in these commitments stipulate that accounting practices will be maintained and auditable. Evergy has conducted assessments and prepared annual filings to the Commission on its performance in terms of affiliate transaction-oriented merger commitments.⁷ In addition, Evergy, in partnership with stakeholders, procured an "independent 3rd-party management audit report of the Company's corporate cost allocations and affiliate transaction protocols."⁸ This assessment evaluated Evergy's performance in light of industry best practices concerning affiliate transactions and corporate cost allocation. In fulfillment with the merger commitments, the audit was designed to assess the appropriateness of cost allocation practices among affiliates within Evergy's holding company and to measure compliance with the Commission's Affiliate Transactions Rule.⁹ The report, prepared by Schumaker and Associates, made four recommendations to Evergy and indicated that the Company's practices align with industry norms.¹⁰

Other Finance and Administration merger commitments require assurances about transition and transaction costs and the availability of accounting books to MPSC Staff. In Evergy's 2018 rate case MPSC Staff evaluated transaction and transition costs, verifying the Company's compliance (via a series of information requests, etc.). Yet other commitments require affirmative proof that customers are not harmed as a result of financial or rate impacts that derive from the merger. Evergy witness Darrin Ives provided testimony in support of the Company's strong performance in producing material net benefits from the merger in Evergy's 2018 rate case.¹¹ The Company will most likely file testimony addressing the same concepts in its next rate case as well.

⁷ See, e.g., Evergy Missouri Affiliate Transaction Report, March 15, 2021.

⁸ MO Merger Proceeding, Exhibit A to the Stipulation and Agreement (January 12, 2018), p. 11, Commitment 31.

⁹ 4 CSR 240-20.015

¹⁰ Schumaker and Associates, Management Audit of Affiliate Transactions and Corporate Cost Allocations Involving Evergy Companies, January 28, 2020.

¹¹ Missouri Public Service Commission, Case No.: ER-2018-0145, Direct Testimony of Darrin R. Ives, pp. 6-7.



The benefits that have flowed from the GPE-Westar merger have rendered many of the Finance and Administration merger commitments irrelevant since the merger was completed (e.g., the commitments that would apply in the case of a credit rating downgrade). Concentric's review has indicated that the Company's performance on all of the Finance and Administration commitments meets the industry's standard for management and reporting vigilance and compliance.

Legal

Legal merger commitments apply to the initial composition of the Evergy Board of Directors and to ensuring MPSC Staff can access Board of Directors meeting agendas and minutes.

The initial Board of Directors composition merger commitment applied for a period of three years and was honored throughout that period. Evergy continues to provide MPSC Staff with access to Board of Directors' meeting minutes, agendas, presentations and handouts, and related information distributed in advance of Board of Directors meetings.

Regulatory

Regulatory merger commitments apply to (1) rate increases, (2) affiliate transactions, (3) customer information privacy protections, (4) adherence to approved cost allocation methodologies and manuals, (5) employment levels, and (6) legacy commitments made in prior regulatory proceedings.

Customer benefits from the merger (*i.e.*, including protection from rate increases) have exceeded expectations. Evergy leaders indicated to Concentric that testimony to this effect will be provided in Evergy's next rate case (expected to be filed in 2022) by witness Darrin Ives. Evergy assesses and reports on its adherence to established rules and industry best practices concerning affiliate transactions and corporate cost allocation each year.¹² Findings from management audits that Concentric has reviewed indicate no substantive deficiencies in Evergy's practices. Our review indicates that Evergy's tracking and monitoring of Regulatory merger commitments, and in particular those that address affiliate transactions and corporate cost allocations, meet or exceed industry standards.

Strategy/Integration

Evergy's Strategy and Integration merger commitments include (1) the obligation to meet with MPSC Staff on a quarterly basis for one year to discuss integration progress, (2) a requirement to

¹² See *supra*, note 7.



provide quarterly employee headcount data for a period of two years, and (3) a requirement that for a period of two years any reports made to the Evergy Board of Directors concerning merger efficiencies be provided to MPSC Staff within 30 days of such reports being provided to the Board of Directors.

All merger commitments related to Strategy and Integration have been completed and no longer apply.

Miscellaneous Commitments

Two miscellaneous merger commitments merit discussion in this report:

1. The requirement that Evergy establish and maintain a dialogue with industrial customers (i.e., meeting with senior management, outside of regulatory / governmental affairs) through 2023; and
2. The commitment to maintain or improve current load sampling and research practices of KCP&L and GMO after the Merger, and that Evergy's Missouri affiliates will discuss with Staff any modifications planned to integrate Westar and KCP&L and GMO load sampling and research practices.

Concentric verified that Evergy has held periodic and constructive discussions with industrial customers since the merger closed. Challenges with keeping scheduled meetings materialized in 2020 as a result of the COVID-19 pandemic. All involved parties agreed to reschedule a meeting that was planned for November 2020 to 2021. Meetings between Evergy and industrial customers resumed in May of 2021.

Evergy has taken steps to modernize its load analysis processes by replacing its load sampling and research practices with direct analysis of customer load data obtained from its Advanced Metering Infrastructure (AMI) and Meter Data Management (MDM) systems. Using state of the art methodologies and new systems and software tools, Evergy has completed the transformation to its new approach and is supporting the current rate case development efforts. Formalized plans and processes have been communicated to MPSC Staff.

V. CONCLUSIONS

Concentric's evaluation of Evergy's approach to monitoring adherence to commitments made to the MPSC, its Staff, and other stakeholders in the course of the GPE-Westar merger proceeding indicates that Evergy's practices are consistent with industry best practices.



APPENDIX 1: RESOURCES USED IN SUPPORT OF CONCENTRIC'S ASSESSMENT

- Evergy Internal Audit assessment of merger conditions, processes, adherence
- Annual Reports to the Commission on Affiliate Transactions (2018-current)
- External audit on Affiliate Transactions
- Meeting agendas/minutes for quarterly discussions w/regulatory Staff on the EVRG Customer Service organization
- The Evergy Cost Allocation Manual (CAM)
- Reference to discussion in 2018 case testimony concerning assessment of merger benefits
- Goodwill Impairment Report
- Integration Success reports that have been provided to MPSC Staff, the Commission
- Records of formal meetings with industrial customers that have taken place since 2018



KCP&L Continues Sustainability Commitment by Announcing Retirement of Six Units at Three Power Plants

6/2/2017

Media Contact:

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KANSAS CITY, Mo. (June 2, 2017) — Kansas City Power & Light Company (KCP&L) announces its plans to retire six generating units at the company's Montrose, Lake Road and Sibley Stations. These actions further the company's commitment to a sustainable energy future and balanced generation portfolio.

"When these power plants started operation more than 50 years ago, coal was the primary means of producing energy. Today, as part of our diverse portfolio, we have cleaner ways to generate the energy our customers need," said Terry Bassham, President and CEO of Great Plains Energy and KCP&L. "After considering many options, it is clear that retiring units at Montrose, Lake Road and Sibley is the most cost-effective way to meet our customers' energy needs as we continue to move to a more sustainable energy future."

In 2015, KCP&L announced the company was considering retiring the coal units or converting them to an alternative fuel source at these plants. One coal-fired unit at the Lake Road Station was converted to natural gas in 2016. Since that time, several emerging industry trends and changing circumstances led the company to announce its plans to retire the six generating units.

A number of factors contributed to the decision to retire these units, including:

- **Reduction in wholesale electricity market prices.** The value of energy produced by these plants has dropped in recent years, primarily driven by new wind generation and lower natural gas prices.
- **Near-term capacity needs.** KCP&L does not anticipate needing new capacity for many years with expected relatively flat long-term peak load growth. In addition,

the amount of reserve generating capacity the company is required to carry has been reduced.

- **Plant age.** The impacted units are older, with all beginning service between 1960-1969. Making costly investments in the units does not make financial sense when compared to other generation sources.
- **Expected environmental compliance costs.** It is not economic to retrofit these plants with the controls necessary to meet expected environmental requirements.

Wind energy sources have become a much more economic generation resource for the region. According to the Southwest Power Pool, of which KCP&L is a member, energy generation from wind has increased 30 percent year-over-year in 2016. KCP&L announced plans in 2016 to purchase an additional 500 megawatts (MW) of power from two new wind facilities at Osborn and Rock Creek. In 2017, the company is set to increase its renewable portfolio to more than 1,450 MW, or greater than 20 percent of KCP&L's total generating capacity needs.

"In addition to our substantial renewable energy portfolio, KCP&L has the largest per capita energy efficiency portfolio of any investor-owned utility in the region," said Bassham. "By retiring these plants, KCP&L is taking another step forward in our plan to provide cleaner, cost effective energy to our customers."

KCP&L intends to retire all the Montrose and Sibley coal units by December 31, 2018. The Lake Road natural gas unit will be retired by December 31, 2019. Lake Road's steam operations are not impacted by today's announcement. KCP&L is committed to making every reasonable effort to find job opportunities within the company for employees currently working at these plants.

Timeline for Retirement:

Generating Unit	Capacity	In-service	Retire by
Lake Road 4/6	97 MW	1967	Dec. 31, 2019
Montrose 2	164 MW	1960	Dec. 31, 2018
Montrose 3	176 MW	1964	Dec. 31, 2018
Sibley 1	48 MW	1960	Dec. 31, 2018
Sibley 2	51 MW	1962	Dec. 31, 2018
Sibley 3	364 MW	1969	Dec. 31, 2018

For more information on KCP&L's sustainability efforts, visit www.kcpl.com/environment.

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About Great Plains Energy: Headquartered in Kansas City, Mo., Great Plains Energy Incorporated (NYSE: GXP) is the holding company of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company, two of the leading regulated providers of electricity in the Midwest. Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company use KCP&L as a brand name. More information about the companies is available on the Internet at: www.greatplainsenergy.com or www.kcpl.com.

Forward-Looking Statements: Statements made in this release that are not based on historical facts are forward-looking, may involve risks and uncertainties, and are intended to be as of the date when made. Forward-looking statements include, but are not limited to, the outcome of regulatory proceedings, cost estimates of capital projects and other matters affecting future operations. In connection with the safe harbor provisions of the Private Securities Litigation Reform Act of 1995, Great Plains Energy and KCP&L are

providing a number of important factors that could cause actual results to differ materially from the provided forward-looking information. These important factors include: future economic conditions in regional, national and international markets and their effects on sales, prices and costs; prices and availability of electricity in regional and national wholesale markets; market perception of the energy industry, Great Plains Energy and KCP&L; changes in business strategy, operations or development plans; the outcome of contract negotiations for goods and services; effects of current or proposed state and federal legislative and regulatory actions or developments, including, but not limited to, deregulation, re-regulation and restructuring of the electric utility industry; decisions of regulators regarding rates the Companies can charge for electricity; adverse changes in applicable laws, regulations, rules, principles or practices governing tax, accounting and environmental matters including, but not limited to, air and water quality; financial market conditions and performance including, but not limited to, changes in interest rates and credit spreads and in availability and cost of capital and the effects on nuclear decommissioning trust and pension plan assets and costs; impairments of long-lived assets or goodwill; credit ratings; inflation rates; effectiveness of risk management policies and procedures and the ability of counterparties to satisfy their contractual commitments; impact of terrorist acts, including but not limited to cyber terrorism; ability to carry out marketing and sales plans; weather conditions including, but not limited to, weather-related damage and their effects on sales, prices and costs; cost, availability, quality and deliverability of fuel; the inherent uncertainties in estimating the effects of weather, economic conditions and other factors on customer consumption and financial results; ability to achieve generation goals and the occurrence and duration of planned and unplanned generation outages; delays in the anticipated in-service dates and cost increases of generation, transmission, distribution or other projects; Great Plains Energy's ability to successfully manage transmission joint venture; the inherent risks associated with the ownership and operation of a nuclear facility including, but not limited to, environmental, health, safety, regulatory and financial risks; workforce risks, including, but not limited to, increased costs of retirement, health care and other benefits; and other risks and uncertainties.

This list of factors is not all-inclusive because it is not possible to predict all factors. Other risk factors are detailed from time to time in Great Plains Energy's and KCP&L's quarterly reports on Form 10-Q and annual report on Form 10-K filed with the Securities and Exchange Commission. Each forward-looking statement speaks only as of the date of the particular statement. Great Plains Energy and KCP&L undertake no obligation to publicly update or revise any forward-looking statement, whether as a result of new information, future events or otherwise.