

Exhibit No.:
Issue: SPP Markets; Unplanned Load
Changes
Witness: John R. Carlson
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Evergy Missouri West
Case No.: ER-2023-0444
Date Testimony Prepared: November 30, 2023

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2023-0444

REBUTTAL TESTIMONY

OF

JOHN R. CARLSON

ON BEHALF OF

EVERGY MISSOURI WEST

CONFIDENTIAL

**Kansas City, Missouri
November 2023**

REBUTTAL TESTIMONY

OF

JOHN R. CARLSON

CASE NO. ER-2023-0444

I. INTRODUCTION

1

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

3 A: My name is John R. Carlson. 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 Senior Manager – Market Operations
7 for 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: Are you the same John R. Carlson who submitted direct testimony in this docket?**

13 A: Yes, I am.

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

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

1 **Q: What is the purpose of your rebuttal testimony?**

2 A: The purpose of my testimony is to address the direct testimony of Commission Staff
3 witness Brook Mastrogiannis, specifically with regards to the tracking of Nucor deviations
4 that exceed 25% and that occur for more than 4 hours.

5 **Q: Was Ms. Mastrogiannis accurate when she stated that “EMW already agreed to this,”**
6 **a reference to accounting for the first 4 hours of an operational event?**

7 A: No, she was not accurate. EMW did not agree to track operational events starting with hour
8 one of a qualified event (after more than 4 hours of greater than 25% deviation in expected
9 versus actual Nucor load). The language in the stipulation was written to allow for
10 variability that can occur in Nucor operations and in the SPP markets.

11 **Q: Does your rebuttal testimony from ER-2022-0130 suggest that EMW agrees with**
12 **Staff’s approach to tracking operational events?**

13 A: No, it does not. The purpose of my rebuttal testimony in the referenced proceeding was to
14 specifically address significant errors made by Staff witness Luebbert using his analysis.

15 **Q: If you were already correcting errors with Mr. Luebbert’s analysis, why not correct**
16 **the timing error for when tracking of an operational event starts?**

17 A: I did not want to redesign Mr. Luebbert’s analysis so that I could specifically focus on the
18 inherent errors in his analysis. These errors included understating the revenue associated
19 with the Cimarron Bend III wind farm (increase from approximately \$1.9 million to \$6.8
20 million) and the impacts of operational events (instead of an approximate \$1.7 million of
21 incremental cost there was an approximate \$5.1 million incremental benefit).

1 Given the magnitude of these errors, my focus was on correcting them, using Mr.
2 Luebbert's analysis, versus developing a whole new analysis. I did not want to "muddy the
3 waters" with a rework of the analysis.

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

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

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

In the Matter of the Application of Evergy West,)
Inc. d/b/a Evergy Missouri West for Authority)
To Implement Rate Adjustments Required by) File No. ER-2023-0444
20 CSR 4240-20.090(8) and the Company’s)
Approved Fuel and Purchased Power Cost)
Recovery Mechanism)

AFFIDAVIT OF JOHN R. CARSLON

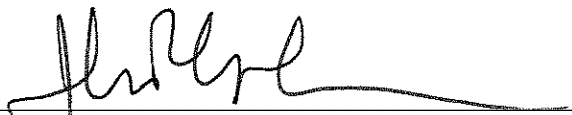
STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

John R. Carlson, being first duly sworn on his oath, states:

1. My name is John R. Carlson. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Senior Manager – Market Operations.

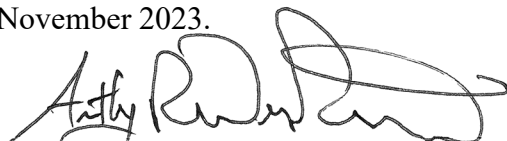
2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of Evergy Missouri West consisting of three (3) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

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.



John R. Carlson

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



Notary Public

My commission expires: 4/26/2025

