Exhibit No.:

Issue: SPP Admin Fees
Witness: Lisa A. Starkebaum
Type of Exhibit: Surrebuttal Testimony

Sponsoring Party: Evergy Missouri Metro and Evergy

Missouri West

Case No.: EO-2023-0276/0277

Date Testimony Prepared: January 18, 2024

## MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: EO-2023-0276/0277

## **SURREBUTTAL TESTIMONY**

**OF** 

## LISA A. STARKEBAUM

## ON BEHALF OF

### **EVERGY MISSOURI METRO and EVERGY MISSOURI WEST**

January 2024

# SURREBUTTAL TESTIMONY

# **OF**

# LISA A. STARKEBAUM

# Case No. ER-2023-0276/0277

1		I. INTRODUCTION
2	Q.	Please state your name and business address.
3	A:	My name is Lisa A. Starkebaum. My business address is 1200 Main, Kansas City,
4		Missouri 64105.
5	Q:	By whom and in what capacity are you employed?
6	A:	I am employed by Evergy Metro, Inc. and serve as Manager - 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 Metro and Evergy Missouri West
14		(collectively, the "Company").
15	Q:	Are you the same Lisa A. Starkebaum who previously filed direct testimony in this
16		docket?
17	A:	Yes.

## Q: What is the purpose of your surrebuttal testimony?

- 2 A: The purpose of my testimony is to briefly respond to the rebuttal testimony of Staff witness
- Brooke Mastrogiannis as it relates to SPP administrative fees under Schedule 1 and 1a that
- 4 Evergy Missouri West included in its FAR filing.

1

- 5 Q: Please reiterate the circumstances around why these charges were incurred.
- 6 A: These charges represent short-term transmission service purchased to facilitate physical 7 power imports from the MISO RTO into the SPP RTO. Weather alerts for the operating 8 days of February 3 and February 4, 2022 were issued which necessitated short term 9 procurement of transmission paths. As noted in my Direct testimony, in early February 10 2022, the SPP RTO was experiencing advisories due to forecasted extreme cold weather 11 and precipitation. Natural gas pipelines, that Evergy Missouri West relies on for generation 12 fuel, were issuing weather alerts and warnings of potential interrupted natural gas flows 13 during this event. Due to the Company's net energy position to the market and the pipelines 14 weather alerts, Evergy determined it was appropriate to prepare for diversification of 15 energy sources.

## 16 Q: Are SPP administrative fees recoverable through the FAC?

- 17 A: No, not generally except the Company viewed this event in total as a non-SPP short-term
  18 transaction used to make purchases for customer load.
- 19 Q: Why did Evergy Missouri West include these costs within its FAC?
- A: As stated in response to Staff data request 0040.3, SPP administrative fees are excluded from recovery in the FAC. However, as noted in the response to 0040.1, weather alerts for the operating days of February 3<sup>rd</sup> and February 4<sup>th</sup> necessitated short term procurement of transmission paths by Evergy Missouri West. The Company viewed this event and

- 1 transaction as a whole; an unusual, short-term transaction needed to serve its load that was
- 2 outside the normal course of business and recoverable under its FAC tariff.
- 3 Q: What FAC tariff language did the Company rely on to support the inclusion of these
- 4 costs within the FAC?
- 5 A: Evergy Missouri West's FAC tariff revised sheet no. 127.16 provides the following
- 6 definition, "Subaccount 565000: non-SPP transmission used to serve off-system or to make
- 7 purchases for load..." As stated above, the Company viewed this event as a short-term
- 8 transaction that fell outside of the normal course of SPP transmission costs and needed to
- 9 serve its load and therefore recoverable under the FAC.
- 10 Q: Does that conclude your testimony?
- 11 A: Yes, it does.

# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Fifth Prudence Review	)	
of Costs Subject to the Commission-	)	
Approved Fuel Adjustment Clause of	)	Case No. EO-2023-0276
Evergy Metro, Inc. d/b/a Evergy Missouri	)	
Metro	)	
In the Matter of the Eleventh Prudence	)	
Review of Costs Subject to the	)	
Commission-Approved Fuel Adjustment	)	Case No. EO-2023-0277
Clause of Evergy Missouri West, Inc. d/b/a	)	
Evergy Missouri West	)	

#### AFFIDAVIT OF LISA A. STARKEBAUM

STATE OF MISSOURI	)	
	)	SS
COUNTY OF JACKSON	)	

Lisa A. Starkebaum, being first duly sworn on his oath, states:

- 1. My name is Lisa A. Starkebaum. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Manager Regulatory Affairs.
- 2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of Evergy Missouri Metro and 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.

Lisa<sup>l</sup>A Starkebaum

Subscribed and sworn before me this 18<sup>th</sup> day of January 2024.

Notary Public

My commission expires: 4/2u/w25

ANTHONY R. WESTENKIRCHNER
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 26, 2025
PLATTE COUNTY
COMMISSION #17279952