BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Evergy Missouri West Inc. d/b/a Evergy Missouri West Containing its Semi-Annual Fuel Adjustment Clause True-Up)))	File No. EO-2024-0204
In the Matter of the Application of Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Authority to Implement Rate Adjustments Required by 20 CSR 4240-20.090(8) and the Company's Approved Fuel and Purchased Power Cost Recovery Mechanism))))	<u>File No. ER-2024-0205</u> Tracking No. JE-2024-0096

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its Staff Recommendation states as follows:

- 1. On December 29, 2023, the Commission issued its *Order Directing Notice and Setting Deadlines for Intervention Applications and Staff's Recommendation* in both Case No. EO-2024-0204 and ER-2024-0205. The *Order* stated that no later than January 29, 2024, Staff shall file recommendations regarding its analysis of Evergy Missouri West's application and proposed tariff sheet.
- 2. On December 29, 2023, In Case No. ER-2024-0205, Evergy Missouri West filed a proposed revised tariff sheet, 2nd Revised Sheet No. 127.34, canceling 1st Revised Sheet No. 127.34, with revised fuel adjustment rates (lines 16, 19, 22, and 25 on 2nd Revised Sheet No. 127.34) of its Fuel Adjustment Clause ("FAC"), and bearing an effective date of March 1, 2024.
- 3. Also on December 29, 2023, in Case No. EO-2024-0204, Evergy Missouri West initiated a rate adjustment mechanism ("RAM") true-up, to be included in the proposed revised fuel adjustment rate ("FAR") laid out in ER-2024-0205. According to Evergy Missouri

West's true-up filing for Recovery Period 30 ("RP30") for billing months (September 1, 2022, through August 30, 2023), Evergy Missouri West under-collected from its customers \$7,860,978 following its Accumulation Period ("AP30") (December 1, 2021, through May 31, 2022). Additionally, included in this true-up filing is a Fuel and Purchased Power Adjustment ("FPA") balance remaining from AP31 in the amount of \$40,157,565¹.

- 4. Subsequently, Evergy Missouri West filed a substitute tariff sheet on January 22, 2024, and submitted to Staff workpapers in support of the substitute tariff sheet. In Evergy Missouri West's substitute filing letter, it explained the Company is making the substitute tariff filing to include in AP33 a corrected amount from AP32 resulting from a change in methodology agreed to by the parties and approved by the Commission on January 18, 2024.² The difference between the original AP32 amount and the corrected amount (including interest) under the changed methodology results in an amount of \$13,500.40³ to be recovered in AP33. As such, the true-up amount on line 8 is the sum of \$7,860,978 under-recovery during RP30, \$40,157,565 from AP31 adjustment/correction, and \$12,614.95 from AP32 adjustment/correction, for a total of \$48,031,158 under-recovery.
- 5. The FPA amount in File No. ER-2024-0205 is \$54,490,264. This represents the total requested increase in the amount sought to be collected in customer FAC charges over the applicable recovery period. The FPA amount includes the difference between the Actual Net Energy Costs ("ANEC") and the Net Base Energy Cost ("B") the Company experienced during the 33rd Accumulation Period, including application of the Commission

¹ Non-Unanimous Stipulation Agreement from Case No. ER-2023-0210 filed on June 21,2023, includes a disputed balance of \$85,420,087 to be partially included for recovery in AP32 (\$45,262,522) and AP33 (\$40,157,565).

² Stipulation and Agreement from Case No. ER-2023-0444 filed on January 5, 2024

³ The substitute tariff (JE-2024-0096) filled on January 22, 2024, in Case No. ER-2024-0205 includes an agreed upon amount of \$13,339.68. After applying the Missouri jurisdictional allocator and 95% sharing from AP32 the amount decreased to \$12,614.93. Including interest of \$885.47 results in a total adjustment of \$13,500.40.

approved 95 percent sharing mechanism, plus the amount from the true-up for the 30th Recovery Period in File No. EO-2024-0204, and applicable interest. The proposed changes to FARs will result in an increase to the typical Evergy Missouri West residential customer's monthly bill (based on 1,000 kWh), before taxes, from \$8.56 to \$12.84, for an increase of \$4.28.

- 6. Based on its examination and analysis of the information Evergy Missouri West filed and submitted in these cases, Staff recommends the Commission issue an order approving Evergy Missouri West's true-up filing for RP30 and the proposed 2nd Revised Sheet No. 127.34, as substituted on January 22, 2024, canceling 1st Revised Sheet No. 127.34, to become effective on March 1, 2024, subject to both true-up and prudence reviews.
- 7. Further explanation of this recommendation is provided in the memos attached to this pleading.

WHEREFORE, Staff submits this recommendation for the Commission's information and consideration.

Respectfully submitted,

/s/ Tracy D. Johnson

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were mailed, electronically mailed, or hand-delivered to all counsel of record on this 29^{th} day of January, 2024.

/s/ Tracy D. Johnson

MEMORANDUM

TO: Missouri Public Service Commission Official Case File

Case No. EO-2024-0204

FROM: Brooke Mastrogiannis, Utility Regulatory Audit Supervisor

DATE: /s/ Brooke Mastrogiannis 01/29/2024

Energy Resources Department /Date

SUBJECT: Staff's Analysis of and Recommendation to Approve Evergy

Missouri West, Inc., d/b/a Evergy Missouri West's Thirtieth Fuel Adjustment Clause True-up Filing Under the Provisions in 20 CSR

4240-20.090(9).

DATE: January 29, 2024

Recommendation

Staff of the Missouri Public Service Commission ("Staff") recommends the Commission approve Evergy Missouri West, Inc., d/b/a Evergy Missouri West's ("Evergy Missouri West") thirtieth true-up filing for Recovery Period 30 ("RP30") during which Evergy Missouri West under-collected \$48,031,158¹ from its customers.

Discussion

On December 29, 2023, Evergy Missouri West filed with the Commission, along with direct testimony and supporting schedules of Evergy Missouri West witness Lisa A. Starkebaum, its fuel adjustment clause ("FAC") true-up filing under the provisions in 20 CSR 4240-20.090(9). According to Evergy Missouri West's true-up filing and agreed settlement in Case No. ER-2023-0210, further discussed below, in the aggregate for RP30 (September 1, 2022 through August 31, 2023), Evergy Missouri West under-collected from its customers \$48,018,543 following its Accumulation Period 30 ("AP30") (December 1, 2021 through May 31, 2022). Subsequently, on January 22, 2024, Evergy Missouri West filed a substitute tariff sheet, as a result of the Commission's *Order Approving Stipulation and Agreement* filed on January 18,

¹ The true-up amount on line 8 of the proposed 2nd Revised Sheet No. 127.34 is \$48,031,158 under-recovery. This includes \$7,860,978 under-recovery from RP30, an adjustment/correction to the current 33rd accumulation period, which was made concurrent to a *Non-Unanimous Stipulation and Agreement* filed on June 21, 2023 in Case No. ER-2023-0210 for \$40,157,565, and another adjustment/correction to the current 33rd accumulation period, which was made concurrent to a *Stipulation and Agreement* filed on January 5, 2024 in Case No. ER-2024-0444 for \$12,614.93.

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2024 in ER-2023-0444. This substitute tariff sheet reflected \$13,339.68 or \$12,614.93 after

applying the Missouri jurisdictional allocator and 95% sharing from Accumulation Period 32

for recovery in Accumulation Period 33. This adjustment is included on the true-up line of the

tariff because it related to a prior accumulation period. Interest of \$885.47 has been computed

on this amount for a total adjustment of \$13,500.40. The interest amount is included on the

interest line of the tariff. After making this correction, there is no change or impact to the FAR

filed on December 29, 2023.

Staff Review and Recommendation

Staff reviewed the direct testimony of Evergy Missouri West witness Lisa A. Starkebaum,

the supporting schedules Evergy Missouri West provided with its application in this case, and

the monthly information Evergy Missouri West submitted to the Commission in accordance

with 20 CSR 4240-20.090(9).

Staff notes one other item impacting this true-up filing that should be mentioned. In Case No.

ER-2023-0210, which was the Company's Accumulation Period ("AP") 31 Fuel Adjustment

Rate ("FAR") filing, there was a Non-Unanimous Stipulation and Agreement filed on June 21,

2023. During AP31 there was \$85,420,087 of costs deferred to future filing. It was agreed to

that \$45,262,522 would be carried over to AP32 FAR and the remainder of \$40,157,565 would

be included in AP33 FAR. As such, the true-up amount on line 8 is the sum of \$7,860,978

under-recovery during RP30, \$40,157,565 from AP31 adjustment/correction, and \$12,614.95

from AP32 adjustment/correction, for a total of \$48,031,158 under-recovery.

Based on its review and analysis of the information Evergy Missouri West filed and submitted

for RP30, Staff has determined that Evergy Missouri West's calculations for the true-up

amounts for RP30, including the calculation of monthly interest, are correct.

Therefore, Staff recommends the Commission approve Evergy Missouri West's thirtieth

true-up filing for RP30 during which Evergy Missouri West under-collected \$48,031,158 from

its customers. The under-collected amount will be collected from the customers as it will be

included in Evergy Missouri West's proposed changes to its current period fuel adjustment rates

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in its semi-annual FAC filing in Case No. ER-2024-0205, filed on December 29, 2023, as substituted on January 22, 2024, for Accumulation Period 33 (June 1, 2023 through November 30, 2023).

Staff has verified that Evergy Missouri West has filed its 2022 Annual Report and is not delinquent on any assessment. Evergy Missouri West is current on its submission of its Surveillance Monitoring reports as required by 20 CSR 4240-20.090(6), and its monthly reports as required by 20 CSR 4240-20.090(5). With the exception of Evergy Missouri West's proposed changes to its current period fuel adjustment rates in its semi-annual FAC filing in Case No. ER-2024-0205 (also filed on December 29, 2023), Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Evergy)	
Missouri West, Inc. d/b/a Evergy Missouri)	Case No. EO-2024-0204
West Containing Its Semi-Annual Fuel)	
Adjustment Clause True-Up)	
)	

AFFIDAVIT OF BROOKE MASTROGIANNIS

STATE OF MISSOURI)	
)	SS
COUNTY OF COLE)	

COMES NOW BROOKE MASTROGIANNIS and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation*, in *Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this _______ day of January 2024.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2027
Commission Number: 15207377

Notary Public L. Voust