

Exhibit No.:
Issues: *Directory of Staff witnesses; Past MEEIA Cycles; 2024 IRP preferred resource plan; EO in fourth MEEIA cycle*
Witness: *Brad J. Fortson*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Direct Testimony*
Case No.: *EO-2024-0369 and EO-2024-0370*
Date Testimony Prepared: *May 24, 2024*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

DIRECT TESTIMONY

OF

BRAD J. FORTSON

**EVERGY METRO, INC.,
d/b/a Evergy Missouri Metro
CASE NO. EO-2023-0369**

**EVERGY MISSOURI WEST, INC.,
d/b/a Evergy Missouri West
CASE NO. EO-2023-0370**

*Jefferson City, Missouri
May 24, 2024*

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DIRECT TESTIMONY
OF
BRAD J. FORTSON

EVERGY METRO, INC. d/b/a EVERGY MISSOURI METRO
CASE NO. EO-2023-0369
and
EVERGY MISSOURI WEST, INC. d/b/a EVERGY MISSOURI WEST
CASE NO. EO-2023-0370**

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1 **DIRECT TESTIMONY**

2 **OF**

3 **BRAD J. FORTSON**

4 **EVERGY METRO, INC. d/b/a EVERGY MISSOURI METRO**

5 **CASE NO. EO-2023-0369**

6 **and**

7 **EVERGY MISSOURI WEST, INC. d/b/a EVERGY MISSOURI WEST**

8 **CASE NO. EO-2023-0370**

9 Q. Please state your name and business address.

10 A. My name is Brad J. Fortson, and my business address is Missouri Public
11 Service Commission, 200 Madison Street, PO Box 360, Jefferson City, MO 65102.

12 Q. By whom are you employed and in what capacity?

13 A. I am employed by the Missouri Public Service Commission (“Commission”)
14 as the Regulatory Compliance Manager of the Energy Resources Department.

15 Q. Please describe your educational background and work experience.

16 A. Please refer to the attached Schedule BJJF-d1.

17 Q. Have you previously filed testimony before this Commission?

18 A. Yes. Please also refer to the attached Schedule BJJF-d1 for a list of cases in
19 which I have previously led or participated in.

20 **EXECUTIVE SUMMARY**

21 Q. What is the purpose of your direct testimony?

22 A. My direct testimony will discuss (1) a directory of Staff witnesses and their
23 issues in their direct testimonies in this case; (2) evidence available to the Commission in prior
24 Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“EMM”) and Evergy Missouri West, Inc.
25 Evergy Missouri West (“EMW”) (collectively “Company” or “Evergy”) Missouri Energy
26 Efficiency Investment Act (“MEEIA”) cycles; (3) 2024 Integrated Resource Plan (“IRP”)

1 preferred resource plan (“PRP”); and (4) earnings opportunity (“EO”) in a fourth
2 MEEIA cycle.

3 Q. What is the overall purpose of Staff’s direct testimony?

4 A. Staff’s overall position in its direct testimony is that it is not reasonable at this
5 time for the Commission to approve a MEEIA program portfolio and its extraordinary
6 ratemaking authority. Staff’s direct testimony in this case outlines concerns with the ability to
7 design a MEEIA portfolio that complies with statutory requirements at this time, and provides
8 recommendations for a process to execute if the Commission directs the parties to proceed
9 with a MEEIA portfolio at this time.¹

10 Q. Why is Staff taking this approach to MEEIA at this time?

11 A. As further detailed throughout mine and other Staff witnesses’ direct testimony
12 in this case, conditions surrounding MEEIA, and the entire electric industry as a whole,
13 have changed, and to date, analysis does not support that ratepayers will break even or benefit
14 from a MEEIA cycle 4 at this time. In fact, changing conditions have been a major
15 contributing factor to the 2023 and 2024 one-year MEEIA extensions as opposed to the
16 multiyear MEEIA portfolios previously approved. EMM has now had over ten years of
17 MEEIA programs and EMW has now had nearly twelve years of MEEIA programs.
18 The Federal Government has and continues to influence the energy efficiency market through
19 tax incentives, and there has and continues to be state and federal loans and grants, including
20 the recent passage of the Inflation Reduction Act (“IRA”), all of which also provide no
21 shortage of work for contractors. Federal Energy Independence and Security Act (“EISA”)

¹ My testimony discusses Earnings Opportunity development, Ms. Lange’s testimony discusses avoided revenue mechanism development, Mr. Luebbert’s testimony discusses program design as an iterative process related to avoided cost and earnings opportunity quantifications.

1 energy efficiency baselines continue to increase. Low-hanging fruit like lighting and home
2 energy report programs have ran their course. Naturally occurring energy efficiency,² building
3 code standards, and appliance efficiency inherently increase with time. There are also a
4 number of issues with Evergy's current demand-side programs investment mechanism
5 ("DSIM") that will be addressed in Staff's direct testimony as well.

6 **STAFF WITNESSES AND ISSUES**

7 Q. How is Staff's direct testimony organized?

8 A. My direct testimony will describe an overview of Staff's position. Ms. Lange's
9 direct testimony will provide an overview of MEEIA and the MEEIA statute. Mr. Luebbert's
10 direct testimony will provide a more detailed discussion of the complications and interactions
11 of the actual operation of MEEIA and the development of a MEEIA portfolio that complies
12 with statutory requirements, particularly the requirement that a MEEIA portfolio be beneficial
13 to all customers in the customer class in which the programs are proposed regardless of
14 whether the programs are utilized by all customers.

15 Table 1, below, provides additional specificity concerning Staff's witnesses and the
16 issues they address.

² Naturally occurring energy efficiency can occur through customer choice, customer knowledge, and product availability.

1

Table 1: Staff witness and issues	
Witness Name	Issues
Brad J. Fortson	Directory of Staff witnesses; Evidence available to the Commission in prior Evergy MEEIA cycles; 2024 IRP preferred resource plan; Earnings opportunity in fourth MEEIA cycle
Sarah L.K. Lange	Overview of MEEIA; MEEIA enabling statute; Avoided revenue mechanism if authorized under MEEIA Cycle 4;
J Luebbert	Avoided Costs and avoided Earnings Opportunity; Additional context for MEEIA complications; Designing a MEEIA compliant portfolio
Justin Tevie	Moral hazard; Importance of accurate energy and demand savings estimates; MEEIA cost recovery to date; DSIM filing timing
Mark Kiesling	Program design; Other sources for energy efficiency funding
Jordan Hull	ARCs and BDR budgets
Amy Eichholz	Low-income program tariffs; Residential low-income program design; low-income federal assistance; Low-income non-MEEIA programs
Hari Poudel	TD; EM&V; Rebound effect; Rate case annualization

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3 **EVIDENCE AVAILABLE TO THE COMMISSION IN PRIOR MEEIA CYCLES**

4 Q. Has the Commission previously authorized MEEIA Cycles for
5 EMM and EMW?

6 A. Yes. On December 22, 2011, EMW filed its *Application of KCP&L Greater*
7 *Missouri Operations Company* (“EMW MEEIA Cycle 1”) in Case No. EO-2012-0009.
8 This case ultimately settled, and on October 29, 2012, the Commission approved the

1 *Non-Unanimous Stipulation and Agreement Resolving KCP&L Greater Missouri Operations*
2 *Company's MEEIA Filing.* On January 7, 2014, EMM filed its *Application of Kansas City*
3 *Power & Light Company* ("EMM MEEIA Cycle 1") in Case No. EO-2014-0095. This case
4 ultimately settled, and on June 5, 2014, the Commission approved the *Non-Unanimous*
5 *Stipulation and Agreement Resolving Kansas City Power & Light Company's MEEIA Filing.*

6 On August 28, 2015, EMM and EMW filed its *Application to Approve DSIM Filing,*
7 *Request for Variances and Motion to Adopt Procedural Schedule* ("Evergy MEEIA Cycle 2")
8 in Case Nos. EO-2015-0240 and EO-2015-0241, respectively. On November 23, 2015,
9 a *Non-Unanimous Stipulation and Agreement Resolving MEEIA filings* ("MEEIA Cycle 2
10 Stipulation") was filed.³ The Commission's *Report and Order* issued on March 2, 2016,
11 approved the Company's amended MEEIA plan contained in the MEEIA Cycle 2 Stipulation.

12 On November 29, 2018, EMM and EMW filed its *Application To Approve DSIM*
13 *Filing, Request For Variances and Motion To Adopt Procedural Schedule*
14 ("Evergy MEEIA Cycle 3") in Case No. EO-2019-0132 and EO-2019-0133, respectively.
15 On December 11, 2019, the Commission issued its *Report and Order* approving the Evergy
16 MEEIA Cycle 3 as filed by Evergy, and modified by the Commission.⁴ Since then, the parties
17 have agreed, and the Commission has approved, two subsequent 1-year extensions
18 for 2023 and 2024.

19 Q. What program budgets were agreed to in the previous MEEIA cycles?

20 A. For MEEIA Cycle 1,⁵ a program budget of approximately \$19.2 million for
21 EMM and \$41.8 million for EMW was approved. For MEEIA Cycle 2, a program budget of

³ On November 31, 2015, Brightergy, LLC filed its *Objection to Non-Unanimous Stipulation.*

⁴ Further modified on March 11, 2020, in the Commission's *Amended Report and Order.*

⁵ July 6, 2014 – December 31, 2015.

1 approximately \$54.9 million for EMM and \$65.5 million for EMW was approved.⁶
2 For MEEIA Cycle 3 (initial 3 years, 2020 – 2022), a program budget of approximately \$43.9
3 for EMM and \$52.4 for EMW was approved. For extension year 2023, a program budget of
4 approximately \$29.03 for EMM and EMW combined was approved, and for extension year
5 2024, a program budget of approximately \$29.04 for EMM and EMW combined was
6 approved. Evergy’s combined total MEEIA budget for cycles 1-3 has been
7 approximately \$335.77 million (2013 – 2024).

8 Q. What net benefits have been achieved through the Evergy MEEIA Cycles
9 to date?

10 A. That is hard to say, because the calculation of net benefits is very subjective,
11 based on assumptions, and it has never been verified that the benefits ever really happened.

12 Q. Please explain.

13 A. The independence of Evaluation, Measurement, and Verification (“EM&V”)
14 is crucial to its value to the Commission. Commission rule 20 CSR 4240-20.093(8) states in
15 part that, “The utility shall provide oversight and guidance to the independent EM&V
16 contractor, but shall not influence the independent EM&V contractor’s report(s).” It is hard,
17 if not impossible, for EM&V to not be influenced by the utility when the utility is providing
18 most of the inputs the EM&V contractor is relying on for final EM&V results.

19 In developing prior MEEIA cycles, the benefits used as a part of the cost-effectiveness
20 calculation are the energy and demand savings multiplied by the avoided energy, capacity,

⁶ Includes 25% increase to EMM and EMW budgets for the 2019 extension.

1 and transmission and distribution costs (“avoided costs”) based on deemed energy and
2 demand savings values for each measure in Evergy’s MEEIA portfolio.⁷

3 Q. To what extent has the Commission had an opportunity to determine whether
4 those benefits truly materialized?

5 A. There is an EM&V process, but that process to date has relied on assumptions,
6 and the verification has occurred for a relatively small sample size of measures. Further, after
7 final EM&V reports are filed for any given program year, there is not a process in place to
8 ensure those evaluated savings actually occurred as they were deemed to have. For example,
9 MEEIA Cycle 1 savings targets heavily relied on compact fluorescent lamps (“CFLs”).
10 It appears EMW, if not EMM as well, assumed a 15-year useful life for CFLs. Assuming a
11 15-year useful life, CFLs installed in 2015 (the final year of MEEIA Cycle 1) would have
12 lasted until 2029. Due to potential CFL concerns (e.g. contain mercury and disposal of broken
13 or burned-out CFLs) and the prominence of LED light bulbs (e.g. more efficient than CFLs),
14 we know that all CFLs installed in 2015 did not last until 2029. However, Evergy has been
15 compensated for the persistence of savings that were assumed for the 9-year deemed savings
16 of CFLs.

17 The energy and demand savings results of the EM&V are then multiplied by the
18 avoided costs that were considered earlier during program design.

19 Q. After the approval of a MEEIA application, has the Commission had an
20 opportunity to review whether or not the statutory requirement that a MEEIA portfolio was

⁷ The total number of measures purchased (or given away) are multiplied by each measures deemed energy and demand savings.

1 beneficial to all customers in the customer class in which the programs are proposed regardless
2 of whether the programs are utilized by all customers has been satisfied?

3 A. Not to date. Per 20 CSR 4240-20.092(1)(C), “Avoided costs or avoided utility
4 costs means the cost savings obtained by substituting demand-side programs for existing and
5 new supply-side resources...” However, as discussed by Mr. Luebbert, avoided energy costs
6 are flown through the Evergy FAC, and avoided capacity costs may or may not materialize,
7 particularly if renewable energy products with low variable costs are the avoided supply-side
8 resource. While the Commission may determine that a MEEIA application is **expected** to
9 provide benefits to all customers in the customer class in which the programs are proposed,
10 regardless of whether the programs are utilized by all customers, it has never had an
11 opportunity to review whether or not the benefits **actually** happened.

12 **2024 IRP PREFERRED RESOURCE PLAN**

13 Q. Can you highlight EMM’s preferred resource plan from its 2024 integrated
14 resource plan filed in Case No. EO-2024-0153?

15 A. Yes. EMM’s preferred resource plan includes the following:

- 16 • 150 MW wind facilities in 2029, 2030, 2031, 2033, 2034, 2035, and 2042.
- 17 • 300 MW solar facility in 2027 and 150 MW solar facilities in 2028 and 2040.
- 18 • 415 MW combustion turbine (“CT”) in 2032 and 325 MW combined cycles
19 (“CC”) in 2036, 2038, 2039, and 2041.
- 20 • Retirements of La Cygne 1 in 2032, La Cygne 2 in 2039, and Iatan 1 in 2039.
- 21 • Realistic Achievable Potential (“RAP”)⁸ demand-side management (“DSM”).

⁸ The RAP level of DSM is RAP+, which means some amount higher than what RAP was determined to be.

1 Q. Can you highlight EMW's preferred resource plan from its 2024 integrated
2 resource plan filed in Case No. EO-2024-0154?

3 A. Yes. EMW's preferred resource plan includes the following:

- 4 • 150 MW wind facilities in 2031, 2032, 2033, 2034, and 2041.
- 5 • 150 MW solar facilities in 2027 and 2042.
- 6 • 143 MW CC in 2024, 325 MW CC in 2029, and a 415 MW CT in 2030.
- 7 • Retirements of Jeffrey 2 and Jeffrey 3 in 2030, Jeffrey 1 in 2039, and Iatan 1
8 in 2039.
- 9 • RAP DSM.⁹

10 Q. To be clear, even with the MEEIA energy and demand savings to date, and the
11 inclusion of an energy efficiency and demand response portfolio in its current preferred
12 resource plan, Evergy is not only planning a 1,950 MW renewable generation buildout within
13 the next ten years, but also 1,298 MWs of dispatchable generation within the next ten years,
14 and another 750 MWs of renewable generation and 1,300 MWs of dispatchable generation in
15 the following eight years. So after 12 years of MEEIA, what capacity costs is
16 Evergy avoiding?

17 A. Evergy modeled four plans with no DSM over the 20-year planning horizon
18 for EMM, and three for EMW. In Staff's limited review thus far of those plans, it appears
19 very little, if any, supply-side investments are being avoided.

20 Q. Based on past experience, is it reasonable to expect that a fourth MEEIA cycle
21 will materially avoid or defer supply-side investments?

⁹ The RAP level of DSM is RAP+, which means some amount higher than what RAP was determined to be.

1 A. No. Under the preferred resource plans, Evergy is planning relatively
2 near-term and long-term renewable buildout coupled with non-renewable additions.
3 Evergy has aggressively promoted its lessened reliance on coal generation and expansion of
4 renewable generation.

5 Q. How does this relate to development of an Earnings Opportunity for a fourth
6 MEEIA Cycle?

7 A. As discussed by Mr. Luebbert, the intent of the Earnings Opportunity as a
8 component of a MEEIA mechanism should be to compensate shareholders for return not
9 earned on investments not made. The EO should be designed to result in utility shareholders
10 receiving compensation to approximate the present value of the earnings opportunity on
11 capacity-related investments that they would receive if the utility did not facilitate DSM
12 programs, all else being equal. The inclusion of an EO is to remove a disincentive for utility
13 promotion of ratepayer-funded DSM programs.

14 **EARNINGS OPPORTUNITY IN FOURTH MEEIA CYCLE**

15 Q. Should Evergy receive an EO if no investment is being avoided or deferred due
16 to its MEEIA programs?

17 A. No. Section 393.1075.3 RSMo states in part that, “In support of this policy,
18 the commission shall: (3) Provide timely earnings opportunities associated with cost-effective
19 measurable and verifiable efficiency savings.” Section 393.1075.4 further states in part that,
20 “Recovery for such programs shall not be permitted unless the programs... are beneficial to
21 all customers in the customer class in which the programs are proposed, regardless of whether
22 the programs are utilized by all customers.” However, there are two separate issues requiring

1 consideration when authorizing a MEEIA cycle: (1) are costs avoided sufficient to be
2 beneficial to the relevant customers, and (2) has an earnings opportunity been avoided for
3 shareholders, thus justifying inclusion of an EO mechanism in that MEEIA cycle.

4 Q. In order for all customers to benefit, MEEIA rates, offset by FAC impact, must
5 be lower than the increase to general rates that would have occurred due to new supply-side
6 investment. Is it possible to avoid costs without avoiding earnings opportunities?

7 A. Yes. To authorize a MEEIA cycle the Commission must conclude that
8 program participants and non-participants (all customers) will benefit from such programs.
9 Avoiding or deferring a supply-side investment(s) is a source of avoided costs that is also a
10 source of an avoided earnings opportunity.

11 Q. Commission rule 20 CSR 4240-20.094(4)(C)4. states:

12 (C) Demonstration of cost-effectiveness for each demand-side program and for
13 the total of all demand-side programs of the utility. At a minimum, the electric
14 utility shall provide all workpapers, with all models and spreadsheets provided
15 as executable versions in native format with all links and formulas intact, and
16 include:

17 4. The impacts from all demand-side programs included in the application on
18 any postponement or new supply-side resources and the early retirement of
19 existing supply-side resources, **including annual and net present value of any**
20 **lost utility earnings related thereto.** [emphasis added]
21

22 What does this provision require?

23 A. This provision requires demonstration that the demand-side programs in **that**
24 MEEIA application impacts any postponement or new supply-side resources and the early
25 retirement of existing supply-side resources, including annual and net present value of any
26 lost utility earnings (EO) related to **that** MEEIA application. Based on the preferred resource
27 plan discussion above, any current or near-term MEEIA application is not expected to
28 postpone or avoid the need for the large buildout of renewable and non-renewable

1 supply-side generation. It would also then appear that previous MEEIA cycles had no impact
2 in Evergy deferring or avoiding that supply-side buildout. Therefore, unless (1) programs are
3 carefully designed to avoid or defer a supply side resource and (2) sufficient modeling is
4 performed to provide clear and demonstrable evidence that it is avoiding or deferring
5 supply-side generation, any fourth MEEIA cycle should not include an EO. Program design,
6 avoided costs, and earnings opportunity are further discussed in Mr. Luebbert's
7 direct testimony.

8 Q. Does this conclude your direct testimony in this proceeding?

9 A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc. d/b/a)
Evergy Missouri Metro's Notice of Intent to) Case No. EO-2023-0369
File an Application for Authority to Establish)
a Demand-Side Programs Investment)
Mechanism)
)
n the Matter of Evergy Missouri West, Inc.)
d/b/a Evergy Missouri West's Notice of) Case No. EO-2023-0370
Intent to File an Application for Authority to)
Establish a Demand-Side Programs)
Investment Mechanism)

AFFIDAVIT OF BRAD J. FORTSON

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW BRAD J. FORTSON and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Direct Testimony of Brad J. Fortson*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.



BRAD J. FORTSON

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 21st day of May 2024.





Notary Public

Brad J. Fortson

Education and Employment Background

I am the Regulatory Compliance Manager of the Energy Resources Department, Industry Analysis Division of the Missouri Public Service Commission. Prior to my current position, I was employed at the Missouri Public Service Commission as a Regulatory Economist from December 2012 through March 2015 and August 2015 through February 2019.

I received an Associate of Applied Science degree in Computer Science in May 2003, Bachelor of Science degree in Business Administration in May 2009, and Master of Business Administration degree with an emphasis in Management in May 2012, all from Lincoln University, Jefferson City, Missouri.

Prior to first joining the Commission, I worked in various accounting positions within four state agencies of the State of Missouri. I was employed as an Account Clerk II for the Inmate Finance Section of the Missouri Department of Corrections; as an Account Clerk II for the Accounts Payable Section of the Missouri Department of Health and Senior Services; as a Contributions Specialist for the Employer Accounts Section of the Missouri Department of Labor and Industrial Relations; and as an Accountant I for the Payroll Section of the Missouri Office of Administration. From April 1 through July 31, 2015, I worked for the Missouri Office of Public Counsel before joining the Commission once again.

Brad J. Fortson
Case Participation History

Case Number	Company	Issue	Exhibit
HR-2014-0066	Veolia Energy Kansas City	Revenue by Class and Rate Design	Staff Report
GR-2014-0086	Summit Natural Gas of Missouri, Inc.	Large Volume Service Revenue	Staff Report
ER-2014-0258	Union Electric Company d/b/a Ameren Missouri	Revenue by Class and Rate Design	Staff Report
ER-2014-0258	Union Electric Company d/b/a Ameren Missouri	Revenue by Class and Rate Design	Staff Report, Rebuttal & Surrebuttal Testimony
ER-2014-0351	The Empire District Electric Company	Revenue by Class and Rate Design	Staff Report & Rebuttal Testimony
ER-2014-0351	The Empire District Electric Company	Revenue by Class and Rate Design	Rebuttal Testimony
EO-2015-0240	Kansas City Power & Light Company	Custom Program Incentive Level	Direct Testimony
EO-2015-0241	KCP&L Greater Missouri Operations Company	Custom Program Incentive Level	Direct Testimony
ER-2016-0023	The Empire District Electric Company	DSM Programs and MEEIA Filings	Staff Report
ER-2016-0023	The Empire District Electric Company	DSM Programs and MEEIA Filings	Staff Report, Rebuttal & Surrebuttal Testimony
EM-2016-0213	The Empire District Electric Company (merger case)	DSM Programs and MEEIA Filings	Rebuttal & Surrebuttal Testimony
ER-2016-0156	KCP&L Greater Missouri Operations Company	MEEIA summary and LED street lighting	Staff Report
EO-2016-0183	Kansas City Power & Light Company	MEEIA prudence review	Staff Report
EO-2016-0223	The Empire District Electric Company	Triennial compliance filing	Staff Report
ER-2016-0285	Kansas City Power & Light Company	LED street lighting	Staff Report
ER-2016-0179	Union Electric Company d/b/a Ameren Missouri	LED street lighting	Staff Report
ER-2016-0285	Kansas City Power & Light Company	Response to Commissioner questions	Staff Report
ER-2016-0179	Union Electric Company d/b/a Ameren Missouri	Response to Commissioner questions	Staff Report

EO-2017-0209	Kansas City Power & Light Company	MEEIA prudence review	Staff Report
EO-2017-0210	KCP&L Greater Missouri Operations Company	MEEIA prudence review	Staff Report
EO-2015-0055	Union Electric Company d/b/a Ameren Missouri	Flex pay pilot program	Rebuttal Testimony
GR-2018-0013	Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities	Red Tag Program and Energy Efficiency Program Funding	Staff Report, Rebuttal & Surrebuttal Testimony
ER-2018-0145	Kansas City Power & Light Company	LED street lighting, TOU rates	Rebuttal Testimony
ER-2018-0146	KCP&L Greater Missouri Operations Company	LED street lighting, TOU rates	Rebuttal Testimony
EO-2018-0211	Union Electric Company d/b/a Ameren Missouri	Program Design	Rebuttal Report & Surrebuttal Testimony
EO-2019-0132	Kansas City Power & Light Company	Program Design	Rebuttal Report & Surrebuttal Testimony
EO-2019-0376	Union Electric Company d/b/a Ameren Missouri	MEEIA prudence review	Direct Testimony
ER-2019-0374	The Empire District Electric Company	Hedging policy and EE/LI programs	Supplemental Testimony
EO-2020-0280	Evergy Metro	IRP Annual Update	Staff Report
EO-2020-0281	Evergy Missouri West	IRP Annual Update	Staff Report
ER-2020-0311	The Empire District Electric Company	Fuel Adjustment Clause	Rebuttal Testimony
EO-2020-0227	Evergy Metro and Evergy Missouri West	MEEIA prudence review	Direct Testimony
EO-2020-0262	Evergy Metro and Evergy Missouri West	FAC prudence review	Direct & Rebuttal Testimony
EO-2021-0021	Union Electric Company d/b/a Ameren Missouri	Triennial compliance filing	Staff Report
EO-2021-0035	Evergy Metro	Triennial compliance filing	Staff Report
EO-2021-0036	Evergy Missouri West	Triennial compliance filing	Staff Report
EO-2021-0416	Evergy Missouri West	MEEIA prudence review	Staff Report
EO-2021-0417	Evergy Metro	MEEIA prudence review	Staff Report

EO-2022-0061	Evergy Missouri West	Application for Special Rate	Rebuttal Testimony
EO-2022-0064	Evergy Missouri Metro	FAC prudence review	Direct Testimony
EO-2022-0065	Evergy Missouri West	FAC prudence review	Direct Testimony
EO-2022-0040	The Empire District Electric Company	Securitization	Rebuttal Testimony
EF-2022-0155	Evergy Missouri West	Securitization	Rebuttal & Surrebuttal Testimony
ER-2022-0129	Evergy Missouri Metro	FAC	Direct & Surrebuttal Testimony
ER-2022-0130	Evergy Missouri West	FAC	Direct & Surrebuttal Testimony
EA-2022-0245	Union Electric Company d/b/a Ameren Missouri	CCN	Rebuttal Testimony
EA-2022-0328	Evergy Missouri West	CCN	Rebuttal Testimony
EA-2023-0286	Union Electric Company d/b/a Ameren Missouri	CCN	Rebuttal Testimony
ER-2023-0444	Evergy Missouri West	FAC	Rebuttal Testimony
EO-2023-0276	Evergy Missouri Metro	FAC	Rebuttal Testimony
EO-2023-0277	Evergy Missouri West	FAC	Rebuttal Testimony
EF-2024-0021	Union Electric Company d/b/a Ameren Missouri	Securitization	Rebuttal Testimony
EO-2023-0136	Union Electric Company d/b/a Ameren Missouri	MEEIA Application	Direct & Rebuttal Testimony