

# Exhibit No. 200

*Exhibit No.:*  
*Issue(s):* Resource Planning  
Imprudence  
*Witness:* Jordan T. Hull  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Rebuttal Testimony  
*Case No.:* EO-2023-0277  
*Date Testimony Prepared:* December 14, 2023

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**ENERGY RESOURCES DEPARTMENT**

**REBUTTAL TESTIMONY**

**OF**

**JORDAN T. HULL**

**EVERGY MISSOURI WEST, INC.  
d/b/a Evergy Missouri West**

**CASE NO. EO-2023-0277**

*Jefferson City, Missouri  
December 2023*

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **JORDAN T. HULL**

4 **EVERGY MISSOURI WEST, INC.,**

5 **d/b/a Evergy Missouri West**

6 **CASE NO. EO-2023-0277**

7 Q. Please state your name and business address.

8 A. Jordan T. Hull, 200 Madison Street, Jefferson City, Missouri 65102.

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

10 A. I am employed by the Missouri Public Service Commission (“Commission”) as  
11 an Associate Engineer in the Energy Resources Department.

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

13 A. Please refer to the attached Schedule JTH-r1.

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

15 A. Yes, I have. Please refer to the attached Schedule JTH-r1 for a list of cases in  
16 which I have previously filed testimony.

17 **Executive Summary**

18 Q. Please summarize your rebuttal testimony in this proceeding.

19 A. The purpose of my rebuttal testimony is to respond to the Office of the  
20 Public Counsel (“OPC”) witness Lena Mantle’s direct testimony, regarding resource  
21 planning imprudence.

22 Q. Please describe Ms. Mantle’s direct testimony.

23 A. Ms. Mantle alleges that Evergy Missouri West, Inc. d/b/a Evergy Missouri West  
24 (“Evergy Missouri West”) acted imprudently for not having maintained sufficient generation

1 and relying on the Southwest Power Pool (SPP) for energy to meet its customers needs.  
2 Therefore, Ms. Mantle recommends a disallowance of \$86,376,294, plus interest, of FAC costs  
3 charged to customers for FAC costs incurred during the review period<sup>1</sup>.

4 Q. Does Staff agree with Ms. Mantle's direct testimony?

5 A. Partially. Staff agrees that Evergy Missouri West has relied on the market at  
6 times to meet its customer's energy needs. However, Staff has not alleged this as an imprudent  
7 decision in this case. Further, if imprudence was alleged, a quantification of the disallowance  
8 associated with it would need to be provided. Ms. Mantle points out that there are many  
9 variables and that it is a "complex optimization of many forecasted variables including future  
10 market prices, the impact of demand-side resources, and customer load requirements"<sup>2</sup> to meet  
11 customer load, and she is right; That is why Staff does not agree with her proposed  
12 disallowance. There are too many variables that determine not only the market price but also  
13 how much is purchased from the market by Evergy Missouri West as well as different variables  
14 associated with building new generation.

15 Q: Has OPC brought this concern up before?

16 A: Yes. According to Ms. Mantle its been brought up 10 times in various case types.

17 Q: Has the Commission ever viewed this concern as imprudent?

18 A: Not to Staff's knowledge.

19 Q. Is Evergy Missouri West attempting to acquire additional generation resources to  
20 address this energy concern?

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<sup>1</sup> June 1, 2021 through November 30, 2022.

<sup>2</sup> Direct testimony of Ms. Mantle, page 5 lines 5 through 8.

1           A.     Yes. There is currently an open case in front of the Commission,  
2 Case No. EA-2023-0291, in which Evergy Missouri West is seeking to acquire Dogwood  
3 Energy Center.

4           Q:     Does Staff support the Company's acquisition of the Dogwood Energy Center?

5           A:     This case is still being evaluated by Staff.

6           Q:     Whats is Staff's conclusion?

7           A:     Staff agrees that Evergy Missouri West has relied on the market at times to meet  
8 its customer's energy needs. Staff is not currently alleging this as imprudent and is unsure of  
9 what a reasonable disallowance would be based on the amount of variables you would have to  
10 consider when trying to quantify such a number.

11          Q.     Does this conclude your rebuttal testimony?

12          A.     Yes

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

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

**AFFIDAVIT OF JORDAN T. HULL**

STATE OF MISSOURI )  
) ss.  
COUNTY OF COLE )

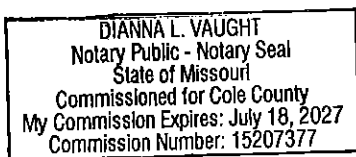
**COMES NOW JORDAN T. HULL** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of Jordan T. Hull*; and that the same is true and correct according to his best knowledge and belief.

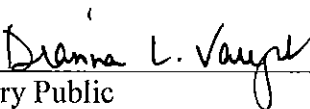
Further the Affiant sayeth not.

  
\_\_\_\_\_  
**JORDAN T. HULL**

**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 11<sup>th</sup> day of December 2023.



  
\_\_\_\_\_  
Notary Public

**Jordan T. Hull**

**CURRENT POSITION:**

I am currently an Associate Engineer in the Energy Resources Department, Industry Analysis Division, of the Missouri Public Service Commission.

**EDUCATIONAL BACKGROUND & WORK EXPERIENCE:**

I received my Bachelor of Science Degree in Biological Engineering from the University of Missouri-Columbia in May of 2016. In June of 2016 I began employment with the Missouri Department of Natural Resources in the Air Pollution Control Program as an Environmental Engineer I. In June of 2017, I was promoted to an Environmental Engineer II within the Air Pollution Control Program. I began employment with the commission in November of 2018.

**Summary of Case Involvement:**

<b>Case Number</b>	<b>Utility</b>	<b>Type</b>	<b>Issues</b>
EO-2019-0067	KCP&L GMO	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2019-0068	KCP&L	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2019-0049	Liberty-Empire Electric Company	Integrated Resource Plan	Misc.
EO-2019-0132 & EO-2019-0133	KCP&L	MEEIA	Misc.
EO-2019-0257	Ameren- Missouri	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
ER-2019-0335	Ameren- Missouri	Rate Case	Heat Rates
ER-2019-0374	Liberty-Empire Electric Company	Rate Case	Heat Rates
EO-2020-0059	Liberty-Empire Electric Company	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2020-0262	EvergyWest	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization, Self-Commitment.
EO-2020-0263	Evergy Metro	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0060	Ameren- Missouri	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0281	Liberty- Empire	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0035	Evergy- Metro	Integrated Resource Plan	Misc.
EO-2021-0036	Evergy- West	Integrated Resource Plan	Misc.



EO-2021-0060	Ameren- Missouri	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
ER-2021-0240	Ameren- Missouri	Rate Case	Heat Rate
ER-2021-0312	Liberty- Empire	Rate Case	Heat Rate
EO-2021-0331	Liberty- Empire	Integrated Resource Plan	Misc.
EO-2022-0064	Evergy- Metro	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EO-2022-0065	Evergy-West	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EA-2022-0099	Ameren- Missouri	CCN	Qualified to construct
EO-2022-0236	Ameren- Missouri	FAAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EA-2022-0244	Ameren- Missouri	CCN	Qualified to construct
EA-2022-0328	Evergy- West	CCN	Qualified to construct
ER-2022-00337	Ameren- Missouri	Rate Case	Heat Rate
EA-2023-0017	Grain Belt Express	Transmission	Qualified to construct
EO-2023-0087	Liberty-Empire	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EA-2023-0131	Liberty- Empire	CCN	Misc.
EO-2023-0136	Ameren- Missouri	MEEIA	Misc.
EO-2023-0180	Ameren- Missouri	MEEIA Prud.	Demand Response
ER-2023-0185	Evergy-West	Rate Case	Heat Rate
EO-2023-0276	Evergy- Metro	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EO-2023-0277	Evergy- West	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EA-2023-0286	Ameren- Missouri	CCN	Misc.
EA-2023-0291	Evergy- Missouri	CCN	Misc.
EO-2023-0407	Evergy-Metro	FAC Prudency Review	Heat Rate, Plant Outages, Generation

			Utilization, Self-Commitment
EO-2023-0408	Evergy-West	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EO-2024-0053	Ameren- Missouri	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment