

Exhibit No.:
Issue(s): Variable Fuel
Witness: Brodrick Niemeier
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: ER-2024-0189
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MISSOURI PUBLIC SERVICE COMMISSION
INDUSTRY ANALYSIS DIVISION
ENGINEERING ANALYSIS DEPARTMENT

REBUTTAL TESTIMONY
OF
BRODRICK NIEMEIER

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

CASE NO. ER-2024-0189

Jefferson City, Missouri
August 6, 2024

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **BRODRICK NIEMEIER**

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

6 **CASE NO. ER-2024-0189**

7 Q. Please state your name and business address.

8 A. My name is Brodrick Niemeier and my business address is Public Service
9 Commission, P.O. Box 360, Jefferson City, MO 65102.

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

11 A. I am employed by the Missouri Public Service Commission (“Commission”) as
12 an Associate Engineer in the Engineering Analysis Department of the Industry Analysis

13 Q. Are you the same Brodrick Niemeier that previously filed direct testimony in
14 this case?

15 A. Yes.

16 **EXECUTIVE SUMMARY**

17 Q. What is the purpose of your rebuttal testimony?

18 A. The purpose of my rebuttal testimony is to present the results of Staff’s updated
19 production cost model run and recommend an updated variable fuel and purchased power
20 expense of \$278,496,721.

21 **VARIABLE FUEL AND PURCHASED POWER EXPENSE**

22 Q. What changes have you made to update the production cost model run?

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Brodrick Niemeier

1 A. The first and most major change were the correction of the location marginal
2 prices (“LMP”) used in the production cost model for Cimarron Bend Wind Farm. There were
3 also two corrections made to the load data.

4 Q. Can you go into more detail about the effects of the Cimarron Bend change?

5 A. Yes. The incorrect LMP generated more profit for Evergy Missouri West
6 (“EMW”) in the simulation, which decreased the variable Fuel and Purchased Power Cost by
7 approximately \$27 million.

8 Q. Can you explain the changes you made to the load data?

9 A. Yes. There are two changes that were made to load data. The first was due to
10 formula errors in a workpaper that adjusted load to account for border customers and Western
11 Area Power Administration sales. The error in the original spreadsheet formula resulted in
12 incorrect adjustments being made. The other change made was in the hourly Load Node LMP
13 data. The Load Node LMP data used in Staff’s results spreadsheet was inconsistent in 92
14 of 8,760 hours with the Load Node LMP data used in the model. Together these two changes
15 affected the variable fuel and purchased power expense by less than \$500,000.

16 Q. Have you made any other changes or adjustments to the production cost model
17 or supporting workpapers.

18 A. No.

19 Q. What was the impact of these changes?

20 A. Before these changes, Staff’s variable fuel and purchased power expense
21 was \$250,773,215; and after the above changes Staff’s variable fuel and purchased power
22 expense is \$278,496,721. These corrections result in an approximately \$27.2 million increase
23 in Staff’s variable fuel and purchase power expense.

24 Q. Does this conclude your rebuttal testimony?

25 A. Yes, it does.

