

Exhibit No.:

Issue: DSIM Rider

Witness: Leigh Anne Jones

Type of Exhibit: Surrebuttal Testimony

Sponsoring Party: Evergy Missouri Metro and Evergy
Missouri West

Case No.: EO-2023-0369/0370

Date Testimony Prepared: August 20, 2024

MISSOURI PUBLIC SERVICE COMMISSION

CASE NOS.: EO-2023-0369/0370

SURREBUTTAL TESTIMONY

OF

LEIGH ANNE JONES

ON BEHALF OF

**EVERGY MISSOURI METRO and
EVERGY MISSOURI WEST**

**Kansas City, Missouri
August 2024**

SURREBUTTAL TESTIMONY

OF

LEIGH ANNE JONES

Case Nos. EO-2023-0369/0370

1

I. INTRODUCTION

2 **Q: Please state your name and business address.**

3 A: My name is Leigh Anne Jones. My business address is 1200 Main Street, Kansas
4 City, Missouri 64105.

5 **Q: Are you the same Leigh Anne Jones who filed direct testimony in these dockets
6 on April 29, 2024, and rebuttal testimony on July 9, 2024?**

7 A: Yes.

8 **Q: Who are you testifying for?**

9 A: I am testifying on behalf of Evergy Metro, Inc. d/b/a as Evergy Missouri Metro
10 (“Evergy Missouri Metro”), Evergy Missouri West, Inc. d/b/a Evergy Missouri
11 West (“Evergy Missouri West”) (collectively, “Evergy” or the “Company”).

12 **Q: What is the purpose of your rebuttal testimony?**

13 A: The purpose of my testimony is to address certain issues or recommendations raised
14 with regard to the Company’s proposed Throughput Disincentive included in the
15 Evergy Demand Side Investment Mechanism (“DSIM”) Rider by Staff Witnesses
16 Sarah Lange and Hari Poudel.

1 **Q: Staff Witness Lange notes in her rebuttal testimony that “Evergy’s proposal**
2 **fails to track the avoided energy sales to the rate plan on which customers are**
3 **served. Admittedly, doing so would be overwhelmingly complex. This**
4 **inoperable complexity is among Staff’s considerations in recommending**
5 **removing Evergy’s financial disincentive to facilitating programs to reduce**
6 **energy consumption by tracking actual net variable revenue for each**
7 **applicable class at each utility against the rate case level, and reconciling the**
8 **difference through the Missouri Energy Efficiency Investment Act (MEEIA)**
9 **rate charged to these customers?” Do you agree?**

10 A: No. The Company believes that its proposed modifications to the Throughput
11 Disincentive (“TD”) calculation represents a reasonable and adequate level of
12 additional tracking and analysis to reflect the impact of avoided energy sales by
13 rate plan without being “overwhelming complex.” In fact, Staff’s proposed
14 alternative avoided revenue mechanism potentially introduces even greater levels
15 of financial disincentive to Evergy by resulting in negative adjustments to MEEIA
16 rates if actual net variable revenues exceeded rate case levels due to factors which
17 have nothing to do with energy efficiency such as weather, customer load growth
18 etc.

1 **Q: Staff Witness Poudel states on page 2 of his rebuttal testimony, “Introducing**
2 **adjustments to the NTD, Net Marginal Rate (“NMR”), and energy savings**
3 **estimates to accommodate these variations based on the type of measure and**
4 **rate code would result in a level of complexity that could make the NTD**
5 **calculation mechanism unworkable.” Do you agree?**

6 A: No. The Company has introduced adjustments to the TD calculation that
7 accommodate all the variations at a reasonable level of complexity. Hypothetically,
8 even if the Company expanded the level of detail in the residential TD calculation
9 to each of the residential rate schedules (currently four residential rate schedules)
10 and end use measure categories (currently eight end use measure categories) this
11 would by no means result in “a level of complexity that could make the NTD
12 calculation mechanism unworkable.”

13 **Q: How frequently would the NMR’s be updated under Evergy’s proposal?**

14 A: Consistent with Cycles 2 and 3, the NMR’s used in the TD calculations will be
15 updated with the effective date of new rate tariffs implemented following a general
16 rate case.

17 **Q: How will the NMR’s be updated?**

18 A: The NMR rate for each business customer class will be computed by month based
19 on the final rate case tariff workpapers in the same manner as has been utilized in
20 Cycles 2 and 3. The residential NMR’s for each of the four residential time of use
21 rate schedules will be computed for each time period and month based on the final
22 rate case tariff workpapers and a weighted average will be computed based on the

1 weighted average customer enrollment in each rate schedule as of the rate case true-
2 up date.

3 **Q: Staff Witness Poudel further states on page 2 of his rebuttal testimony, “A**
4 **different avoided revenue calculation mechanism is required for residential**
5 **and Small General Service due to the current mechanism’s failure to**
6 **appropriately consider variations in the timing of expected reductions**
7 **throughout a day, season, and year, as well as the duration of the reduction**
8 **within a given day...” Do you believe Staff’s alternative avoided revenue**
9 **mechanism accomplishes this?**

10 A: No. First, as Company witness Gunn explains in his Rebuttal testimony Staff’s
11 proposed alternative avoided revenue mechanism does not meet the MEEIA rules
12 definition of throughput disincentive¹. Second, with regard to Small General
13 Service, Evergy’s rates for this customer class do not currently include time of use
14 rate factors.

15 **Q: Staff Witness Poudel further states on page 4 of his rebuttal testimony, “Thus,**
16 **the current MEEIA application necessitates separate NMRs based on rate**
17 **code, by season, and the specific time of day when a consumer reduces energy**
18 **consumption due to their energy efficiency measures.” Do you believe**
19 **Evergy’s proposed TD calculation reasonably accomplishes what Staff is**
20 **requesting?**

21 A: Yes, Evergy’s proposed TD calculation includes separate NMRs by season and
22 specific time of day based on the periods defined in the residential rate schedules

¹ File No. EO-2023-0369/0370, Kevin Gunn Rebuttal Testimony, page 12.

1 and includes each of the four separate residential rate schedules in its weighted
2 average NMR calculation

3 **Q: Does that conclude your testimony?**

4 **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 File an) File No. EO-2023-0369
Application for Authority to Establish a Demand-)
Side Programs Investment Mechanism)

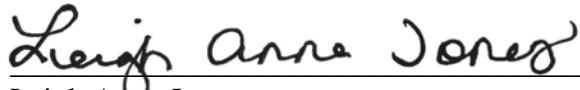
In the Matter of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West's Notice of Intent to File an) File No. EO-2023-0370
Application for Authority to Establish a Demand-)
Side Programs Investment Mechanism)

AFFIDAVIT OF LEIGH ANNE JONES

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

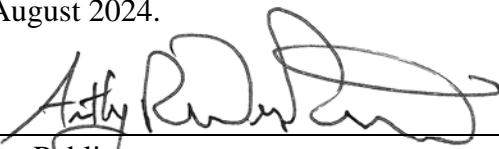
Leigh Anne Jones, being first duly sworn on his oath, states:

1. My name is Leigh Anne Jones. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Senior Director, Corporate Accounting.
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 five (5), 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.



Leigh Anne Jones

Subscribed and sworn before me this 20th day of August 2024.



Notary Public

My commission expires: 4/26/2025

