

Exhibit No.:

Issue(s): *EEI dues, Greenwood
Solar Plant Allocation,
FAC Deferral, PISA, Fuel
Expense, Fuel Inventories,
Opt-in TOU Customer
Education Cost Amortization*

Witness: *Jared Giacone*

Sponsoring Party: *MoPSC Staff*

Type of Exhibit: *Surrebuttal / True-Up
Direct Testimony*

Case No.: *ER-2024-0189*

Date Testimony Prepared: *September 10, 2024*

MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL AND BUSINESS ANALYSIS DIVISION

AUDITING DEPARTMENT

SURREBUTTAL / TRUE-UP DIRECT TESTIMONY

OF

JARED GIACONE

EVERGY MISSOURI WEST, INC.,

d/b/a Evergy Missouri West

CASE NO. ER-2024-0189

*Jefferson City, Missouri
September 10, 2024*

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1 **SURREBUTTAL TESTIMONY**

2 **EEI DUES**

3 Q. What is EMW witness Nunn's recommendation for inclusion in the revenue
4 requirement of EEI dues and payments made to EEI during the test year?

5 A. Ms. Nunn recommends that both EEI payments and membership fees should be
6 included in the Company's cost of service.¹

7 Q. What was Staff's recommendation for inclusion of EEI dues in the revenue
8 requirement?

9 A. In my direct testimony, page 11, beginning on line 3, I stated,

10 Consistent with previous EMW rate cases, Staff removed the amount of
11 EEI dues and fees included in the test year expense from Evergy
12 Missouri West's cost of service, consistent with prior Commission
13 Report and Orders and since Evergy Missouri West did not identify
14 direct quantifiable benefits to the ratepayer or explain their method of
15 allocating the expenses between the shareholders and the ratepayers in
16 direct testimony.

17 Q. In your direct testimony did you cite the same EO-85-185 Commission Report
18 and Order that EMW witness Nunn cited in her rebuttal testimony?

19 A. Yes.

20 Q. What is the significance of both Staff and the Company citing the EO-85-185
21 Commission Report and Order?

22 A. EMW agrees with Staff that the EO-85-185 case from nearly 40 years ago is the
23 basis for how EEI dues should be handled in the revenue requirement. In that particular case
24 the Commission Report and Order stated that the predecessor company to Evergy would receive
25 no portion of EEI dues in that case because the company did not address the question of

¹ Case No. ER-2024-0189, Linda J. Nunn Rebuttal Testimony, page 11, line 18.

1 “whether the Company has quantified the EEI-derived benefits and allocated them between the
2 shareholders and ratepayers” and “the determining factor is what proportion of those benefits
3 should be allocated to the ratepayers as opposed to the shareholder” and further stated,
4 “the Company has been informed in prior rate cases that it must allocate its quantified benefits
5 from membership in EEI.”

6 Q. Did EMW provide testimony in the present case detailing how they allocated
7 the quantified benefit of 85% of 2022 EEI dues and 80% of 2023 EEI dues to the ratepayers,
8 while allocating only 15% and 20% respectively to shareholders?

9 A. No. EMW did not support an adjustment to clearly identify that a portion of the
10 EEI dues were removed from EMW’s rate request. As I stated in my direct testimony, I could
11 see from my review of the general ledger the portion of EEI costs that were booked through
12 routine accounting entries to non-regulated operations. There was no testimony, no adjustment
13 and no explanation for how the amounts booked to non-regulated operations were calculated.
14 For regulatory purposes, there is no information provided in this rate request that identifies that
15 some portion of the dues were in non-regulated operations. Although EMW’s direct case did
16 not illustrate how the amounts booked to non-regulated operations were calculated, it is my
17 understanding it follows the lobbying expense portion of program revenues from EEI’s Internal
18 Revenue Service (“IRS”) Form 990 which I’ve shown in the table below to be 20%.

19 In other words, EEI’s Form 990 is used as the basis for EMW’s allocation of EEI dues
20 to its shareholders and contains no consideration of: 1) EEI employees who are involved in
21 lobbying and advocacy on behalf of utility companies; 2) EEI’s consulting expenses and
22 3) other EEI activities primarily on behalf of utility companies and are not providing a benefit
23 to ratepayers. My testimony will show that a simple 20% calculation of lobbying for income

1 tax purposes does not sufficiently capture the lobbying and advocacy activities EEI performs
2 in the primary interest of member utility companies.

3 Q. Did you review the EEI Form 990?

4 A. Yes. The latest publicly available Form 990 available from the IRS database
5 was from 2021. I've summarized the data in the table below.

6

<u>Summary information from 2021 EEI Form 990</u>	
Program Revenues	\$78,623,725
Salaries	\$39,858,498 [50% of program revenues]
# Of Employees	183
Average Salary Per Employee [Salaries / # of employees]	\$217,806 [Contrast with Evergy average pay per employee ** [REDACTED] **]
Highest Paid Employee [President]	\$5,848,409 salary \$2,859,495 other compensation
<u>Other line items from 2021 EEI Form 990</u>	
Consulting expenses	\$6,814,926
Occupancy (office space, utilities)	\$5,867,847
Legal expenses	\$5,812,107
Employee benefits and payroll taxes	\$4,717,517
Conferences, conventions and meetings	\$2,391,800
Information technology	\$1,852,476
Lobbying expenses	\$1,609,967 [20% of program revenues]
Subscriptions	\$861,239
Office expenses	\$720,555
Travel	\$671,780
Technical/Research expenses	\$518,013
Advertising/Promotion expenses	\$306,148
Memberships & Sponsorships	\$253,883
Subtotal	\$32,395,258
Salaries from above	\$39,858,498
Total	\$72,253,756

7
8 Q. Were you able to determine from your review of Form 990 the benefits to utility
9 ratepayers of EEI membership dues?

1 A. No, from the summary nature of the public information available, I was unable
2 to determine any ratepayer benefit of EEI membership dues. I did find it interesting that 50%
3 of program revenues went toward salaries for 183 employees who conduct EEI business from
4 an office located almost exactly equal distance between The White House and U.S. Capitol.
5 I researched some of the employees listed on the Form 990 in an attempt to measure how EEI's
6 payroll costs relate to ratepayer benefits:

7 Brian Wolff, "EVP, Public Policy & External Affairs" was promoted to
8 Chief Strategy Officer in January 2022 according to an EEI news release
9 dated January 13, 2022. The news release specifically states the
10 promotion was "in recognition of his demonstrated leadership, political
11 acumen, and the creative and focused approach he takes to advancing
12 EEI's public policy priorities on behalf of America's investor-owned
13 electric companies. The news release went on to state, "In 2021, Wolff
14 was named one of the The Hill's top lobbyists and was included on the
15 Washingtonian's list of most influential people." See Schedule JG-s1

16 As demonstrated, EEI employee Wolff advances public policy on behalf of investor-owned
17 electric companies.

18 Emily Fisher, "General Counsel & Corporate Secretary & SVP, Clean
19 Energy" according to an EEI biography, "oversees and coordinates clean
20 energy policy engagement across EEI and across the federal government.
21 She is also responsible for managing EEI's litigation and legal affairs,
22 covering a wide range of energy and environment regulatory and policy
23 issues, at the state and federal level." See Schedule JG-s2

24 As demonstrated, EEI employee Fisher coordinates clean energy policy engagement across EEI
25 and the federal government including policy issues at the state level. Not all ratepayers support
26 clean energy policy.

27 Quinlan Shea, "VP, Environment" submitted a "Statement of the Edison
28 Electric Institute" to the Congressional Caucus on Coal on May 25, 2010
29 regarding the Economic Impacts of Coal. The statement reads in part,
30 "EEI and our member companies are committed to the continued use of
31 this critical resource to generate power to meet future growth in the
32 demand of electricity, and to ensure the continued reliability and
33 affordability of our electric power supply while meeting the nation's

1 environmental and climate goals...To meet increasing demand, the
2 power sector will continue to rely upon coal due to its reliability,
3 affordability, and abundant domestic supply...EEI and our member
4 companies are engaged in ongoing dialogs with EPA on all of these
5 environmental challenges to craft regulations and policies that take into
6 account the importance of coal in terms of the reliability and affordability
7 of our national power supply.” See Schedule JG-s3

8 As demonstrated, EEI employee Shea submitted testimony acting as an employee of EEI
9 advocating for the continued use of coal. Not all ratepayers support the use of coal.

10 Q. Does the Form 990 provide any details on the consulting expenses?

11 A. Yes. \$3.5 million of the \$6.8 million amount listed for consulting went
12 to Venable LLP. The “energy law” section of Venable’s website states,

13 We’ve been part of the energy industry for over four decades. We
14 understand the issues you face. Our reputation and relationships in
15 Washington give you a seat at the table and a powerful network of
16 contacts on Capitol Hill and across the spectrum of federal
17 agencies...With that experience and the abilities of Venable’s legislative
18 attorneys and advisors, we offer clients the opportunity to shape current
19 and new directions in energy policy.²

20 Q. Are the consulting expenses that include Venable’s services included in what
21 EEI categorizes as “lobbying” expenses on the Form 990?

22 A. No. There is a separate category for consulting expenses on Form 990 that is
23 different from the lobbying expenses.

24 Q. From your review of Venable’s services is it your opinion they cater only
25 specifically to the interests of utility ratepayers?

26 A. No. This is another example where you cannot identify exactly what services
27 EEI engages with Venable based on the publicly available information. However, from
28 Venable’s website they clearly tout their relationships in Washington and powerful network of

² <https://www.venable.com/services/practices/energy-law>

1 contacts on Capital Hill and their ability to shape current and new directions in energy policy.
2 Again, this is just another example where EMW has not attempted to explain or quantify exactly
3 what the benefit is to utility ratepayers.

4 Q. Are you aware of any court of appeal cases specific to Evergy or their
5 predecessor companies, where EEI engaged on Evergy or their predecessor companies' behalf?

6 A. Yes. In the United States Supreme Court Case No. 13-787, KCP&L Greater
7 Missouri Operation's ("GMO") appeal of the Commission's Report and Order in Case No.
8 ER-2012-0175, EEI filed an Amicus Curiae brief in support of petitioner, GMO
9 (Schedule JG-s4). The brief concerned GMO's attempt to overturn the Commission's prior rate
10 case decision regarding recovery of plant investment and transmission costs related to the
11 Crossroads Energy Center ("Crossroads"). In the response to a Staff Data Request No. 0445 in
12 Case No. ER-2016-0156 (Schedule JG-s5), GMO stated that "KCP&L requested EEI consider
13 filing an Amicus Brief in Case No. 13-787." This is another clear example of EEI representing
14 the interests of its member utility companies and why ratepayers should not be forced to pay
15 for EEI dues.

16 Q. Are you aware whether EEI is a party to any pending lawsuits?

17 A. Yes. The EEI is currently a party in Case No. 24A116, before the United States
18 Supreme Court and against the federal Environmental Protection Agency ("EPA"). This is an
19 appeal of a decision from the United States Court of Appeals for the District of Columbia
20 Circuit on the EPA's final rule on New Source Performance Standards for Greenhouse Gas
21 Emissions from New, Modified, and Reconstructed Fossil Fuel-Fired Electric Generating
22 Units; Emission Guidelines for Greenhouse Gas Emissions From Existing Fossil Fuel-Fired
23 Electric Generating Units; and Repeal of the Affordable Clean Energy Rule (Schedule JG-s6).

1 The EEI has hired not one but at least two outside law firms in its appeal of the EPA's decision.
2 They are the law firm of Baker Botts, LLP and the law firm of Crowell & Moring LLP, both of
3 which are listed as legal counsel for petitioner EEI (Schedule JG-s7). To be clear, Staff takes
4 no position on the merits of the lawsuit and the potential harm or benefit that might result for
5 utility ratepayers. Again, there are some ratepayers that might be in support of EEI's position
6 against the EPA and other ratepayers who would not be in support. Staff is providing the
7 information solely as evidence of at least a portion of EEI's activities attempting to influence
8 how utilities are regulated that ratepayers should not be forced to pay for.

9 Q. Are you aware of any Federal Energy Regulatory Commission ("FERC") rulings
10 or dockets related to EEI dues?

11 A. Yes. I am aware that on December 16, 2021, FERC issued a Notice of Inquiry,
12 Docket No. RM-22-5-000 to seek comments on the rate recovery, reporting and accounting
13 treatment of industry association dues and certain civic, political, and related expenses
14 (Schedule JG-s8). It is my understanding that this FERC docket is still open at this time. EEI
15 provided a public comment letter in opposition to changes to the FERC Uniform System Of
16 Accounts ("USOA") (Schedule JG-s9). This is the type of activity that supports removal of any
17 level of EEI dues, and why ratepayers should not be forced to pay for the dues of an organization
18 that may or may not be advocating on behalf of every different ratepayer's interest. The issue
19 of captive ratepayer funds being used for lobbying expenses has become so prominent that six
20 United States Senators signed on to a letter addressed to FERC, calling into question whether
21 an organization can require unwilling participants to contribute funds that are used for political
22 activities in light of recent decisions from the United States Supreme Court (Schedule JG-s10).

1 Q. What is your advice to this Commission on how to address the disallowance of
2 EEI dues from the revenue requirement?

3 A. I urge this Commission to order my recommendation to remove EEI dues from
4 the revenue requirement. I would note that EMW witness Nunn agrees that one of the relevant
5 prior Commission Report and Orders, as cited in her rebuttal testimony is EO-85-185. EMW
6 has not provided evidence of the exact quantified benefits that EEI provided to ratepayers.
7 Therefore, it is the burden of the utility, not Staff, any other intervenor, nor this Commission,
8 to justify inclusion of EEI dues in the revenue requirement when no evidence has been provided
9 for Staff, intervenors, or this Commission to analyze. EEI spends money on many things that
10 do not fit an exact definition of lobbying, like 50% of program revenues for employee salaries.
11 EEI dues are not necessary for the safe and adequate provision of utility service. It is not enough
12 for EMW to use a percentage simply taken from the EEI dues invoice as the only justification
13 for ratepayers to bear the remaining cost since that simple lobbying calculation is calculated
14 narrowly for income tax purposes.

15 **GREENWOOD SOLAR PLANT ALLOCATION**

16 Q. What is EMW witness Klote's recommendation for the Greenwood solar plant
17 allocation?

18 A. On page 12 of Klote's rebuttal testimony, he lists a primary and an alternative
19 recommendation for the Commission to either 1) oppose any allocation of the costs of the
20 Greenwood solar facility away from EMW or 2) allocate no more than \$100,000 of the expenses
21 for the Greenwood solar facility away from EMW.

22 Q. Has Staff's recommended allocation method changed since Case No.
23 ER-2016-0156?

1 A. No. As I stated on page 8 of my direct testimony, Staff’s recommendation is
2 consistent with the previous EMW rate cases and is allocated based on the average number of
3 customers reported in the annual reports provided to this Commission for EMW and Evergy
4 Missouri Metro.

5 Q. Has the allocation method Staff recommends been litigated before this
6 Commission?

7 A. No, not since the EA-2015-0256 Certificate of Convenience and Necessity
8 (“CCN”) case where EMW was ultimately ordered by the Commission to propose a means by
9 which costs will be shared with Evergy Missouri Metro customers. The Commission stated that
10 those customers would also benefit from the lessons learned from the pilot project. This issue
11 was resolved in a Stipulation and Agreement in Case Nos. ER-2016-0156, ER-2018-0146 and
12 ER-2022-0130.

13 Q. What is your recommendation to the Commission on how to handle allocation
14 of the Greenwood solar facility?

15 A. I recommend the Commission review the recommendation outlined in my
16 direct testimony which is consistent with Staff’s recommendation in every rate case since
17 the Commission Report and Order from Case No. EA-2015-0256. Staff’s approach is a
18 fact-based and data-driven evidentiary method of allocating the costs rather than taking some
19 arbitrary and unsupported explanation provided for EMW’s recommended zero or maximum
20 “\$100,000” allocation.

21 **FAC DEFERRAL FROM CASE NO. ER-2019-0413**

22 Q. What is the FAC deferral that resulted from Case No. ER-2019-0413?

1 A. This deferral resulted from an FAC Fuel Adjustment Rate (“FAR”) rider filing
2 in 2019. At the time, there was a PISA Compound Annual Growth Rate (“CAGR”) cap for
3 rider mechanisms. EMW hit the CAGR cap in Case No. ER-2019-0413 and the amount over
4 the cap was deferred which is the “FAC deferral”.

5 Q. What is Staff’s recommendation for the FAC deferral balance that resulted from
6 Case No. ER-2019-0413?

7 A. Staff recommends amortizing the original FAC deferral balance over four years
8 with no rate base treatment.

9 Q. What is EMW’s recommendation for the FAC deferral?

10 A. EMW’s recommendation from its direct filed case is to include the FAC deferral
11 balance, plus carrying costs through the effective date of rates in the present case, in the PISA
12 regulatory asset that is included in rate base and amortized over 20 years³.

13 Q. What is the basis for Staff’s recommendation and how does it differ from
14 EMW’s position?

15 A. Staff’s recommendation is a fair, just and reasonable recommendation for this
16 unique situation. Staff acknowledges the FAC deferral balance exists and is recommending
17 EMW receive the funds owed to them over a reasonable four-year period. On the other hand,
18 EMW admits in Klote’s rebuttal testimony that they should have included the FAC deferral
19 balance in PISA in the prior rate case, Case No. ER-2022-0130. Since EMW failed to include
20 the FAC deferral in its prior rate request as it should have, EMW wants ratepayers to foot the
21 bill for the additional carrying costs all the way through the effective date of rates in the present
22 case so EMW can be made whole as if the mistake didn’t occur.

³ Case No. ER-2024-0189, Ronald A. Klote Direct Testimony page 12, lines 1-4.

1 Q. What is EMW witness Klote's rebuttal recommendation for the FAC
2 deferral balance?

3 A. EMW witness Klote lists a primary and an alternative recommendation on
4 page 14, beginning on line 17.

5 Nevertheless, Staff witness Giacone has recommended amortizing this
6 amount over a four-year period. The Company can agree to this
7 recommendation and will include the four-year amortization in the
8 Company's revenue requirement calculation. However, the Company
9 requests that if this option is adopted that carry costs are applied at the
10 Company's rate of return on the deferred amount until the effective date
11 of rates in this case when the deferral amount will begin to be amortized
12 over four years.

13
14 Q: What if Staff is not agreeable to including carrying costs associated
15 with PISA deferral associated with the Company's fuel adjustment clause?

16
17 A: If the Staff does not agree to include carrying costs up until rates are
18 effective in this case, then the Company would request that the statute be
19 followed as intended and that the PISA deferral associated with the fuel
20 adjustment clause be included in rate base and amortized over a 20-year
21 period.

22 Q. What is Staff's response to EMW's primary and alternative recommendations?

23 A. Staff's position from my direct testimony, pages 14-15 does not change. Staff
24 firmly believes the position outlined in my direct testimony is a fair and reasonable solution to
25 this item that should have been requested by EMW and resolved in the prior rate case without
26 the need for an ultimatum by EMW in the present case to either include carrying costs through
27 the effective date of rates in the present case or PISA treatment. If the balance had been
28 included in ER-2022-0130 as it should have been, EMW wouldn't have accrued additional
29 carrying costs beyond January 2023 that it is asking the Commission to recover from ratepayers.
30 However, Staff would provide the Commission with the following information on alternatives
31 that Staff would support, in order of preference.

1

<u>Staff's Primary Recommendation (same as Staff direct)</u>	
Original FAC deferral amount	\$3,533,794
Amortization period	4 years
Annual revenue requirement impact for 4 years	\$883,449
<u>Staff's Alternate Option 1</u>	
Original FAC deferral amount	\$3,533,794
Carrying costs through effective date of rates in ER-2022-0130 (January 2023)	\$1,043,840
Total	\$4,577,634
Amortization period	4 years
Annual revenue requirement impact for 4 years	\$1,144,409
<u>Staff's Alternate Option 2 (agrees with EMW's primary recommendation in rebuttal)</u>	
Original FAC deferral amount	\$3,533,794
Carrying costs through effective date of rates in ER-2024-0189 (Assumes January 2025)	\$1,626,916
Total	\$5,160,710
Amortization period	4 years
Annual revenue requirement impact for 4 years	\$1,290,178

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Staff does not recommend the Commission adopt EMW's alternate recommendation from Klote's rebuttal for including the FAC deferral in PISA because Staff's primary and alternate options will have EMW bear at least some of the responsibility of their mistake by forgoing future carrying costs that could have been earned on this item over the next 20 years.

8

<u>EMW's Alternate Option (NOT RECOMMENDED OR SUPPORTED BY STAFF)</u>	
Original FAC deferral amount	\$3,533,794
Carrying costs through effective date of rates in ER-2024-0189 (Assumes January 2025)	\$1,626,916
Total	\$5,160,710
Amortization Period	20 years
Estimated impact of PISA rate base treatment of unamortized balance between rate cases over 20 years	\$4,581,987
Total return of original FAC deferral amount and the return on the regulatory asset over 20 years	\$9,742,697

1 Staff's alternate option 1 would assume carrying costs through the effective date of rates
2 from the prior rate case where this item should have appropriately been included. Due to the
3 short timeframe between the rate cases, the effective date of rates in this rate case would amount
4 to an additional 24 months of carrying costs that are a direct result of not including recovery of
5 the balance in EMW's prior rate case. Since the difference in the amount is not overly material,
6 Staff has included EMW's primary recommendation from Mr. Klote's rebuttal as Staff's
7 alternate option 2.

8

Cost of alternative recommendations compared to PISA treatment over 20 years			
	Staff's Primary Recommendation	Staff's Alternate Option 1	Staff's Alternate Option 2
Cost of Staff's primary and alternate option 1 and 2	\$3,533,794	\$4,577,634	\$5,160,710
Estimated cost of PISA treatment over 20 years	\$9,742,697	\$9,742,697	\$9,742,697
Estimated ratepayer savings	\$6,208,903	\$5,165,063	\$4,581,987

9 **TRUE-UP DIRECT TESTIMONY**

10 **GREENWOOD SOLAR ALLOCATION**

11 Q. How did you true-up the Greenwood solar plant allocation?

12 A. I used the same methodology as outlined in my direct testimony to true-up the
13 Greenwood solar plant allocation based on plant and reserve balances as of June 30, 2024.
14 It should be noted that between December 31, 2023 and June 30, 2024, EMW added a second
15 FERC subaccount, "34100-Oth Prod-Structures-Elec" for the Greenwood solar plant and
16 reserve. I allocated both Greenwood solar plant accounts and both Greenwood solar reserve
17 accounts using the method described in my direct testimony.

18 **PISA**

19 Q. How did you true-up the PISA asset?

1 A. I included PISA additions through June 2024 that were booked in July 2024
2 which would align with the June 30, 2024 true-up cutoff date. Consistent with the
3 recommendation in my direct testimony, I also made adjustments to remove the capitalized
4 incentive compensation amounts and the solar subscription portion of the Hawthorn solar
5 facility from the PISA calculations.

6 Q. In rebuttal testimony, did EMW witness Mr. Klote address your recommended
7 adjustments to remove the capitalized incentive compensation amounts and the solar
8 subscription portion of the Hawthorn solar facility from PISA calculations?

9 A. Yes. Please refer to page 13, beginning on line 3 of the Rebuttal Testimony of
10 Ronald A. Klote where it states the Company agreed with the calculations and would also
11 remove the amounts in their true-up revenue requirement.

12 **FUEL EXPENSE**

13 Q. How did you true-up fuel expense?

14 A. Staff updated natural gas pricing based on an average monthly natural gas price
15 from calendar year 2021 and 2023. Natural gas prices were higher in 2022 than they have
16 historically been so Staff normalized the expense. Coal is procured under long term contracts
17 so Staff did not true-up coal pricing. Staff adopted EMW's recommendation for oil pricing at
18 direct and expects to adopt EMW's recommended true-up oil price information from their
19 workpapers. I updated the miscellaneous fuel expense accounts to reflect the rolling 12-month
20 general ledger balance as of the June 30, 2024 true-up date and also updated the firm purchased
21 power capacity expense based on new contract pricing which began in June 2024 between
22 EMW and ** [REDACTED] **.

1 **FUEL INVENTORIES**

2 Q. How did you true-up fuel inventories?

3 A. I used the same methodology outlined in my direct testimony to true-up the value
4 of fuel inventory to June 30, 2024.

5 **TOU CUSTOMER EDUCATION COSTS**

6 Q. How did you true-up the default TOU customer education costs?

7 A. I reviewed the actual amount of default TOU customer education costs incurred
8 through the true-up date of June 30, 2024, less the amounts recommended for disallowance or
9 rebooking by Sarah L.K. Lange in her surrebuttal testimony, and amortized the remaining
10 balance over four years.

11 I have attached Confidential Schedule JG-s11 with a detailed breakdown of deferred
12 costs that I received from Evergy which I formatted for clarity. Staff's recommendation is to
13 amortize the \$3,173,845 for costs incurred through June 30, 2024, less any further disallowance
14 of costs, if any, the Commission may order as recommended by OPC witness Lisa A. Kremer,
15 over four years.

16 Q. Did Staff have the breakdown of costs that you include as Confidential Schedule
17 JG-s11 when direct testimony was filed?

18 A. No. Staff worked diligently with EMW throughout this case to obtain this
19 breakdown of costs that I believe the ratepayers and this Commission deserved. Staff received
20 the document via email on August 9, 2024. Up until that point, Staff would have had the burden
21 of reviewing voluminous documentation to compile what Staff believes is a reasonable
22 "itemized receipt" for the costs EMW is requesting recovery of.

23 Q. Does this conclude your Surrebuttal / True-up Direct testimony?

24 A. Yes it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Evergy Missouri West, Inc.)
d/b/a Evergy Missouri West's Request for)
Authority to Implement A General Rate)
Increase for Electric Service)

Case No. ER-2024-0189

AFFIDAVIT OF JARED GIACONE

STATE OF MISSOURI)
COUNTY OF Jackson)

ss.

COMES NOW JARED GIACONE and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Surrebuttal / True-Up Direct Testimony of Jared Giacone*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

Jared Giacone
JARED GIACONE

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Jackson, State of Missouri, at my office in Kansas City, on this 6th day of September 2024.



Cheryl Leverette
Notary Public