

Exhibit No.:
Issue(s): MEEIA, EDR
Witness: Hari K Poudel, PhD
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

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

SURREBUTTAL / TRUE-UP DIRECT TESTIMONY

OF

HARI K. POUDEL, PhD

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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HARI K. POUDEL, PhD
EVERGY MISSOURI WEST, INC.,
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1 **SURREBUTTAL / TRUE-UP DIRECT TESTIMONY**

2 **OF**

3 **HARI K. POUDEL, PhD**

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 Hari K. Poudel, and my business address is P.O. Box 360, Jefferson
9 City, Missouri, 65102 name is Hari K. Poudel, and my business address is P.O. Box 360,
10 Jefferson City, Missouri, 65102.

11 Q. Are you the same Hari K. Poudel that provided direct and rebuttal testimonies
12 in this case?

13 A. Yes.

14 **EXECUTIVE SUMMARY**

15 Q. What is the purpose of your surrebuttal / true-up direct testimony?

16 A. The purpose of this surrebuttal / true-up testimony is to support Staff's
17 adjustments to energy usage as they pertain to Evergy Missouri West's ("EMW") Missouri
18 Energy Efficiency Investment Act ("MEEIA") portfolios, which are then applied to billing
19 determinants of EMW. I will also respond to Evergy witness Al Bass' concern about the
20 MEEIA adjustment.

21 Q. Through this testimony, do you describe the development of the work product
22 that you provided to another Staff witness for the development of an issue?

1 A. Yes. I provide the annualized energy savings by rate class by month for the Staff
2 true-up period to Staff witnesses Kim Cox and Marina Stever to determine appropriate revenue
3 adjustments to include in the overall revenue requirement.

4 **MEEIA ANNUALIZATION ADJUSTMENT**

5 Q. What adjustments did you calculate with respect to the EMW MEEIA portfolio
6 for the true-up period?

7 A. I calculated annualized energy savings for EMW based upon reported savings
8 provided by EMW¹ from energy efficiency measures that were installed during the true-up
9 period. Staff annualized the level of energy efficiency savings that occurred at the end of the
10 true-up period as if they had occurred throughout the year, which is consistent with the Staff
11 approach in EMW's last general rate case, Case No. ER-2022-0130. Staff utilized the data
12 provided by EMW in this analysis. I provided the annualized energy savings by rate class by
13 month for the Staff update period to Staff witnesses Kim Cox and Marina Stever to determine
14 appropriate revenue adjustments to include in the overall revenue requirement.

15 Q. Did Staff perform a MEEIA annualization adjustment for the Large Power
16 Service ("LPS") rate class for the true-up period?

17 A. Yes. Unlike in direct testimony, Staff did not run the MEEIA annualization
18 adjustment for the LPS rate class by individual customer based upon the timing of available
19 information.² Staff witness Marina Stever uses the entire LPS class as a lump sum. Ms.
20 Stever's true-up direct testimony includes a detailed approach on LPS adjustment.

¹ Responses to DRs 263 and 263.1 ER-2024-0189.

² Staff received individual customer MEEIA data on 5th September 2024, but was unable to incorporate into the billing determinant adjustments for the filing of true-up direct. Staff will review the information provided by Evergy and may modify the LPS revenue adjustment in the true-up rebuttal filing.

1 Q. Is there a distinct MEEIA adjustment method used by the Staff in this filing?

2 A. No. Staff used the same MEEIA adjustment method in this filing. Staff's method
3 is based on the actual Kilowatt hour ("kWh") savings during the update period. However,
4 EMW used the projected kWh savings until the true-up date.

5 Q. Does Staff's MEEIA adjustment method exclude any kWh savings projections
6 for the up-date period?

7 A. No. The MEEIA adjustment approach used by Staff does not exclude any kWh
8 savings projection that were included in the update period. However, EMW inappropriately
9 used the projected kWh savings through the end of the true-up period for the direct filing.

10 **ECONOMIC DEVELOPMENT RIDER ("EDR") ADJUSTMENTS**

11 Q. Has Staff revised the EDR adjustment for the true-up period?

12 A. No.

13 Q. Is Staff lacking the necessary information to carry out EDR adjustment for the
14 true-up period?

15 A. Yes. Staff issued Data Request ("DR") 0466 to get information regarding the
16 EDR adjustment for the true-up period. However, EMW provided a "Semi-Annual Report for
17 July 2024."³ The semi-annual report contains cumulative kWh that cannot be used for the
18 monthly calculation of the EDR adjustment. As a result, Staff was unable to carry out EDR
19 adjustment for the true-up period.

20 **CONCLUSION**

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

22 A. Yes it does.

³ DR 0466 ER-2024-0189.

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 HARI K. POUDEL, PhD

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW HARI K. POUDEL, PhD 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 Hari K. Poudel, PhD*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

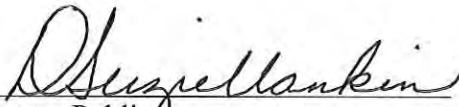


HARI K. POUDEL, PhD

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 3rd day of September 2024.

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: April 04, 2025 Commission Number: 12412070



Notary Public