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Sponsoring Party: Evergy Missouri West
Company
Case No.: ER-2024-0189
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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2024-0189

SURREBUTTAL TESTIMONY

OF

MARISOL E. MILLER

ON BEHALF OF

EVERGY MISSOURI WEST

**Kansas City, Missouri
September 2024**

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SURREBUTTAL TESTIMONY

OF

MARISOL E. MILLER

Case No. ER-2024-0189

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

2 A: My name is Marisol E. Miller. My business address is 1200 Main, Kansas City, Missouri
3 64105.

4 **Q: Are you the same Marisol E. Miller who submitted direct testimony on February 2,**
5 **2024 and rebuttal testimony on August 6, 2024?**

6 A: Yes.

7 **Q: On whose behalf are you testifying?**

8 A: I am testifying on behalf of Evergy Missouri West, Inc. d/b/a Evergy Missouri West
9 (“EMW” or the “Company”).

10 **Q: What is the purpose of your testimony?**

11 A: The purpose of my testimony is to provide response to rebuttal testimony filed by Staff
12 witnesses Kim Cox, Hari Poudel, Sarah Lange, and MEEG witness Kavita Maini. I will
13 provide surrebuttal response specific to the areas of Revenues (Customer Count, Weather
14 Normalization (“WN”) on Time of Use (“TOU”) rates, TOU Winter/Summer usage in
15 shoulder months, Small General Service/Large General Service growth at class level), Net
16 Margin Rate and MEEIA demand adjustment, the TOU adjustment, Revenue Allocation
17 and C&I rate design and Residential Rate Design/Customer Charge. Generally, the TOU
18 tracker and adjustment is broadly covered by several witnesses including myself, Ron

1 Klote, Kimberly Winslow, and Darrin Ives. Class of Cost of Service is being covered by
2 myself, Bradley Lutz, and Craig Brown.

3 Please note that the Company has attempted to address all substantive issues raised
4 by Staff and OPC or other parties which the Company contests. If the Company
5 inadvertently failed to address an issue raised by any party, the absence of a response does
6 not constitute agreement by the Company with the party, and the Company may respond
7 on the topic at hearing.

8 I. BILLED REVENUES

9 **Q: Please describe the issues raised by Staff witness Kim Cox in her Rebuttal Testimony.**

10 A: Ms. Cox offers testimony regarding customer counts, time of use (“TOU”) adjustment to
11 revenues, weather normalization by TOU period/block, seasonal billing in shoulder
12 months, customer growth by class, and Net Metering/Parallel Generation (“NM/PG”)
13 revenues.

14 **Q: Are you providing response to all of Kim Cox’s rebuttal testimony?**

15 A: No. Company witness Albert Bass has already offered response to the appropriateness of
16 weather normalization performed by the Company in his rebuttal testimony and Bradley
17 Lutz will respond to NM/PG issues raised in his surrebuttal testimony. I will cover the
18 remaining issues listed above.

19 **Q: Is there a new concern raised by Staff regarding customer count?**

20 A: No. Ms. Cox continues to raise the same customer count issue I’ve already addressed in
21 my Rebuttal testimony in response to her Direct testimony and Staff’s inconsistent
22 definition/use of customer count in their customer growth calculation and average use per
23 customer. However, Ms. Cox’s rebuttal testimony included a data request (“DR”) response

1 where the Company made a “manual adjustment” to a file containing rate case
2 revenue/determinants actuals. There seemed to be some implication or erroneous
3 understanding by Staff on this DR response that may be misleading. To be crystal clear,
4 the DR response does not change the details offered in my rebuttal testimony and was
5 nothing more than a description of Evergy’s approach. The Company made the decision
6 to continue to use an existing spreadsheet/workpaper template to calculate normalized
7 revenues and growth/average use per customer and instead of recreating the complexity of
8 these calculations in a new file. This decision allowed us to change one formula to
9 reference customer charge and align with Staff’s methodology (i.e. Utilization of customer
10 charge count for customer growth and utilization of customer charge count for all Company
11 definitions of customer count).

12 **Q: Has Staff received all customer charge counts for the Test Year, Update/Cut off, and**
13 **True up?**

14 A: Yes, as explained in my Rebuttal testimony, Staff has received the same customer charge
15 counts utilized by the Company in preparation of our rate case revenues and the Company’s
16 calculation of customer growth and average use per customer.

17 **Q: Ms. Cox provides testimony regarding TOU Pricing period weather normalization**
18 **for MORT rates. Do you have a response?**

19 A: Not specifically since Ms. Cox points to Staff witness Michael Stahlman’s testimony on
20 this issue. Company witness Albert Bass provides specific rebuttal testimony on this issue
21 and in response to Staff testimony offered by Mr. Stahlman.

1 **Q: Ms. Cox describes a concern with Residential TOU seasonal billing and recommends**
2 **review of 20% of TOU rate bills for the months of October and November going**
3 **forward and to provide results to Staff every January. Do you agree?**

4 A: No, I do not agree with Staff and ask the Commission to reject Staff's recommendation.
5 Specifically, Ms. Cox noticed that 2023 usage for one of the Residential TOU rates,
6 MORT, billed based on actual usage and included summer and winter usage in a given
7 month, while shoulder months occurring in October/November 2022, did not show
8 winter/summer usage in a given month. Based on this observation, Staff assumed this was
9 an error. That is incorrect. Instead, at the conclusion of the 2022 EMW rate
10 case, the MORT tariff was modified to bill based on actual usage instead of revenue
11 accounting month and Evergy's billing system was configured to bill according to the
12 Commission approved tariff in December 2022. This means that all MORT billing starting
13 in January 2023 would bill based on actual usage and all bills prior to that would have
14 billed based on the old tariff. Staff's observation aligns with the approved tariff in place
15 at the time of billing and no billing error exists. Since the test year included billing for
16 MORT that included the old tariff in place from June 2022-December 2022 and the new
17 tariff in place January 2023 forward, the billing would obviously be different under those
18 two different time periods.

19 For overall awareness, the Company has robust processes and comprehensive
20 Sarbanes-Oxley ("SOX") controls in place to ensure compliance with Commission
21 approved tariffs in every rate case. Additionally, Evergy completes a reconciliation,

1 identified as the R-20 adjustment, in every rate case that ensures that billed revenues
2 reconcile to our books and records.

3 **Q: Does the Company agree with Ms. Cox's rebuttal testimony suggesting that**
4 **calculating growth adjustments at the rate code level in the direct filing is the**
5 **solution to reducing estimation errors when projecting growth to the true-up date?**

6 A: No. There will always be some level of imprecision when projecting growth into the future.
7 Previous testimony from Company witness Bass indicated that Staff chose not to project
8 growth to the true-up date in its direct filing despite projecting growth in prior cases, while
9 the Company did project growth. We believe this to be the primary driver of the differences
10 between the Company and Staff. This difference is expected to essentially disappear when
11 both the Company and Staff calculate growth through the True-up. This difference in
12 methodology was the reason for a large difference between the Company's and the Staff's
13 respective growth adjustments for the Small General Service class in the direct filing. Mr.
14 Bass' testimony also stated that he expects the difference in growth adjustments between
15 the Company and the Staff for the Small General Service class to be reduced in the true-up
16 filing when both parties have the actual customer count numbers at the true-up date. The
17 Company believes strongly that employing consistent methodology in each case rather than
18 to change methodology subjectively based on the particular data points present in a
19 different set of dates is critical for consistent and reliable results across rate cases.

1 **II. MEEIA**

2 **Q: Please summarize Staff witness Dr. Hari Poudel’s rebuttal testimony regarding**
3 **MEEIA Annualization adjustments to rate case determinants/ revenues.**

4 A: Dr. Poudel’s rebuttal testimony describes broad concerns regarding MEEIA
5 annualization/demand adjustments (reductions) to Evergy rate case revenues.
6 Additionally, he offers repeated concerns on the need for MEEIA margin rates which
7 were addressed in my rebuttal testimony.

8 **Q: Did Evergy make MEEIA annualization demand adjustments to rate case revenues**
9 **or determinants?**

10 A: No, we did not.

11 **Q: What possible reason might Dr. Poudel have to believe a MEEIA annualization**
12 **adjustment was made?**

13 A: I do not know, but it’s possible that Dr. Poudel saw references to Demand adjustment in
14 Evergy workpapers. However, a close look at the resulting calculations should have
15 clearly revealed that no adjustment was made as all factors were set to a value of 1.0
16 which would result in no adjustment of demand determinants and no adjustment to the
17 resulting calculated revenues.

18 **III. TOU ADJUSTMENT & TRACKER**

19 **Q: What was the purpose of the Oracle Batch Rate Analysis Tool (“BRAT”) results that**
20 **served as the foundation for the \$3.1M adjustment made to Revenues?**

21 A: As explained in my Direct testimony, the BRAT rate comparison tool was made available
22 to Evergy residential customers to help them select a TOU rate. The tool was made
23 available so that customers had the option to pre-select their TOU rate prior to required

1 migration to the default TOU rate in 4Q 2023. The rate comparison tool utilized a
2 customer's historical 12-month usage on their current standard rate and calculated their
3 annual bill. The tool took that same usage and calculated what a customer bill would be
4 across all other TOU rates. Customers would then be able to select the TOU rate based on
5 their needs and preferences. For more details on the BRAT analysis, the reasonability of
6 results, and how that information has been shared with the Commission, see the surrebuttal
7 testimony of Company witness Kim Winslow.

8 **Q: What did the BRAT analysis show?**

9 A: The BRAT analysis¹ showed that the collective revenue/bill impact of all analyzed
10 residential customers moving to the TOU rate that would result in their lowest bill would
11 be approximately \$9.3M (potential decrease in revenues) based on test year actual usage.
12 The impact of all² residential customers moved to the MORPA/default TOU rate would be
13 approximately \$56k (potential decrease in revenues). From the Company's perspective,
14 these impacts represent the highest and lowest potential impacts assuming no change in
15 usage.

16 **Q: Why was it necessary to use the BRAT analysis at all?**

17 A: The Test Year (12 months ending June 30, 2023) only reflected the determinants and
18 revenues associated with the standard rates in place prior to moving the majority of
19 Residential customers to TOU rates in December 2023. Without adjustment or
20 annualization of the TOU rates, Residential revenues in the rate case revenues would be
21 under/overstated, resulting in the Company under/over collecting revenues after the

¹ Included MORPA, MORH, and MORT rates only and excluded customers with 9 months of usage or less.

² Only MORT, MORH, and MORG customers with greater than 9 months of usage were modeled and therefore this analysis was a conservative estimate of impacts since it did not reflect total potential impacts of the entire residential class.

1 effective date of rates. The Company decided to leverage the only data available that might
2 inform what TOU rate a residential customer might select and used that information as a
3 starting point for the eventual revenue adjustment/annualization adjustment made.

4 **Q: Staff witnesses Kim Cox & Sarah Lange provide rebuttal testimony outlining their**
5 **adjustment of rate case revenues that essentially assumes that 100%³ of all**
6 **Residential customers are on MORPA rates. Do you disagree with their adjustment?**

7 A: Yes, I disagree. Staff offers no data or analysis to support their assumption that all
8 residential customers will move to the MORPA rate. In fact, the Company has provided
9 the Commission reporting reflecting customer participation provided by rate code that
10 specifically shows residential participation across all TOU rates, as well as, True up actual
11 billing determinants thus far in 2024 that also aligns with this fact. As such, there is broad
12 data that shows customers participating in various TOU rates which is in direct conflict
13 with Staff's assumption and adjustment.

14 **Q: Ms. Lange offers extensive rebuttal testimony regarding the \$3.1M adjustment to rate**
15 **case revenues made by Evergy. How would you summarize her testimony?**

16 A: Ms. Lange has concerns that Evergy leveraged the BRAT analysis showing potential
17 revenue impacts ranging from \$56k to \$9.3M on an actuals basis and made a conservative
18 weather normalized customer growth adjusted revenue adjustment of \$3.1M.

³ Less AMI opt out customers.

1 **Q: On page 4, of Staff witness Kim Cox’s rebuttal testimony says that “EMW’s modeling**
2 **of customer rate choices assumes that the majority of customers would take service on**
3 **MORT3”. Is this correct?**

4 A: No, Evergy merely reports the calculated results from that BRAT analysis. In this case,
5 the analysis showed that IF residential customers all moved to the lowest TOU rate, it
6 would total \$9.3M. There is no assumption here beyond the math result that historical
7 usage on the lowest TOU rate would add up to \$9.3M. In this case, using the historical
8 usage, the BRAT analysis does show that most customers would benefit from a move
9 MORT3. Customers opting to select their TOU rates based on their change in bill OR
10 other factors beyond bill savings is exactly why Company believes that customer selection
11 and change in behavior/usage based on their TOU selection is an unknown that could have
12 an impact on expected revenues and aggregated billings that necessitates a tracker.

13 **Q: Were there more specific issues outlined by Staff?**

14 A: Yes, Ms. Lange also took issue with the adjustments Evergy made to the BRAT revenue
15 impacts to reflect the exclusion of certain Residential customers from their analysis, as well
16 as, the adjustment to reflect weather normalization in determining the \$3.1M adjustment
17 made to rate case revenues

1 **Q: Starting with the \$9.3M Best fit analysis (BRAT revenue impact of customers moving**
2 **to their lowest TOU rate) and the adjustment factor used to adjust for excluded**
3 **customers⁴ of 24.27%, Ms. Lange outlines concerns with the inclusion of AMI opt out**
4 **customers in that adjustment who would otherwise remain on blocked rates and not**
5 **be moved to a TOU rate. Can you approximate the number of AMI opt out**
6 **customers?**

7 A: Yes. The Company estimates approximately 29 AMI opt out customers exists in MO West.
8 This would not be considered materially impactful to the 24.27%, but we acknowledge
9 that adjustment could be made. Unfortunately, there was no systematic way to identify or
10 differentiate opt out customers when they were part of the MORG/blocked rate to have
11 adjusted for them at the time of the utilization of 24.27% factor. However, the Company
12 is open to the minute change that could be made to the 24.27% to reflect these 29
13 customers.

14 **Q: Does Ms. Lange have other concerns with the 24.27% adjustment factor that you**
15 **made to adjust for the fact that test year revenues included the full population of**
16 **Residential customers and the BRAT analysis only included a portion of these**
17 **customers in the \$9.3M Best fit revenue estimate?**

18 A: Yes, it appears that Ms. Lange takes issue with the inclusion Net Metering (“NM”), Parallel
19 Generation, (“PG”) and Solar customers in the \$9.3M best fit analysis because those
20 customers could only take service on the MORPA rate. First, the original BRAT analysis
21 would have excluded NM, PG, and solar customers in their best fit analysis, so they would

⁴ BRAT analysis did not include the full population of Residential customers and only evaluated rate codes MORG, MORH, and MORT (excluding customers with 9 months of bills or less) or approximately 85% of Residential customers in their best fit analysis and was therefore likely understated. The 24.27% adjustment was only adjusting for those customers from those rate codes that were not included (had less than 9 months of usage).

1 not have been included in the \$9.3M. Second, the adjustment factor would only have
2 grossed up for MORG, MORH, MORT or just the rate codes included in BRAT analysis,
3 so essentially no adjustment (gross up) was made for these customers, so Staff's concern
4 is unfounded.

5 **Q: Moving on to the adjustment that you made to reflect normalization of the kwh and**
6 **revenues supporting the \$9.3M, what is Ms. Lange's issue there?**

7 A: Ms. Lange seems to have issue with the accuracy of the .78% adjustment to reflect
8 weather normalization. However, ignoring weather effects to actuals is clearly incorrect.
9 If Staff could suggest a refinement to the .78% adjustment to improve accuracy that
10 would be workable, but utilization of the \$9.3M on its face (actuals) would not have
11 been appropriate with no adjustment for weather

12 **Q: Does Ms. Lange also have issues with the BRAT analysis that analyzed individual**
13 **bills and the revenue impacts of those customers moving to the MORPA rate or the**
14 **\$57k?**

15 A: Based on pg. 10 of Ms. Lange's testimony, weather normalization notwithstanding, Ms.
16 Lange seems to view the estimate to be "reasonable".

17 **Q: Given that the BRAT approach/analysis for both the \$9.3M and the \$56k was**
18 **identical-except that one compared bills on the current rate to the to the best fit rate**
19 **and another compared the current rate to the MORPA rate, do you understand**
20 **Staff's support of one analysis outcome and the rejection of the other?**

21 A: No. I can only presume that Staff is supportive of the MORPA analysis because it
22 generally aligns with their recommended adjustment. It stands to reason that if Staff

1 deems the BRAT analysis supporting the \$57k as reasonable, the \$9.3M would also be
2 deemed reasonable.

3 **Q: Staff takes issue with you utilizing a 26% and 74% weighting factor. What do you**
4 **make of their concern?**

5 A: Evergy utilized the latest enrollment numbers available at the time of the Direct Filing and
6 the preparation of TY revenues, as a basis for weighting the \$9M (11M adjusted) and 6K
7 (78k adjusted). At the time of the filing, 26% of customers had pre-selected to a TOU rate
8 prior to the automatic migration, leaving 74% to be moved to RPA. We then applied
9 those weightings or 26% to the \$11M with the reasonable assumption that a customer
10 would preselect a TOU based on a reduction of their bill by the lowest (best fit) amount.
11 The remaining 74% weighting was then applied to the 78k to come up with the \$3.1M
12 reduction in revenues.

13 **Q: After considering the Staff approach, does the company approach represent the**
14 **best way to estimate TOU impacts?**

15 A: Yes. Evergy utilized all information available including extensive BRAT analysis and the
16 latest customer participation data being tracked by TOU rate in order to come up with its
17 estimate. This is more appropriate than using a broad assumption that all customers would
18 be on one rate when customer participation to date clearly shows that is not the case.

1 **Q: On page 11 of Ms. Lange’s testimony, she states that “any reliance on the “Best Fit”**
2 **calculation is unreasonable” and on page 15, claims that my Direct testimony**
3 **somehow acknowledges the \$3.1M revenue adjustment as “ill-conceived”? Do**
4 **you agree?**

5 A: No. I strongly disagree. First, to ignore BRAT analysis that leverages available usage data
6 for the majority of Residential customers would seem more unreasonable. Staff’s
7 testimony on pages 12-13 are riddled with acknowledged “inferences” by Ms. Lange that
8 try and provide explanation or reasoning as to what a customer might have done or did and
9 why, when such claims are largely guesses at best. Claims as to overstatements of the
10 BRAT analysis are exaggerated, as the analyses are pretty straightforward bill
11 comparisons. While it’s true that the best fit analysis doesn’t guarantee that a customer
12 will move to a given rate, the reduction to their bill could be a significant motivator to most
13 customers and for those that could benefit with further behavioral change, even more
14 tempting. To ignore that possibility doesn’t make sense. The fact is, no one can guarantee
15 with absolute certainty what customers will do, particularly in the summer months when
16 price differentials are most significant, which is precisely why a tracker is being requested.

17 Staff pulled a significant portion of my Direct testimony and inexplicably derived
18 and misrepresented what I hope anyone reading my words can clearly see. My Direct
19 testimony clearly explains that the BRAT analysis and the \$3.1M adjustment cannot be
20 viewed as an absolute perfect estimate of what residential customers might do in the future.
21 Staff claims that my Direct testimony somehow agreed with their perspectives offered now
22 regarding the BRAT analysis or that I would somehow not stand behind my estimate as
23 reasonable are mischaracterizations at best, fabrication at worst.

1 **IV. CCOS RESULTS & REVENUE ALLOCATION**

2 **Q: On page 30 of Ms. Lange’s rebuttal testimony, she states that the Company’s \$3.1M**
3 **adjustment to reflect the potential impact of TOU rates “skews CCos results”. Can**
4 **you clarify the actual impact?**

5 A: While it’s true that any change in revenues will impact CCoS results, particularly each
6 class’s rate of return, in this specific case, the conservative adjustment of \$3.1M is very
7 modest with the Residential class rate of return going from 0.57 to 0.53. This small of a
8 change would not “skew” CCOS results nor did it have any impact in revenue allocation
9 or rate design decisions made by the Company.

10 **V. RATE DESIGN**

11 **Q: On page 43 of Staff’s rebuttal testimony, Ms. Lange states that the recommended**
12 **customer charge reflects the minimum system classification of distribution revenue**
13 **requirement. Is this correct?**

14 A: No. As further elaborated in Company witness Craig Brown’s rebuttal testimony, the
15 customer charge recommended does not reflect the minimum system classification of
16 distribution revenue requirement.

17 **Q: Can you describe how you arrived at your recommendation for the \$14.99**
18 **Residential Customer Charge?**

19 A: Yes, I began with reviewing the results from the CCOS study. In that study, I noted that
20 on an equalized basis, the CCOS results showed a recommended customer charge of
21 \$17.83, excluding local facilities. Local facilities represent the customer-related costs of
22 the transformer and secondaries that are often a part of delivering energy to a customer’s
23 meter.

1 **Q: What was the CCOS study results recommendation for the Residential Customer**
2 **Charge inclusive of local facilities?**

3 A: \$32.19.

4 **Q: Why didn't you recommend a \$32.19 Residential Customer Charge?**

5 A: While the CCOS study results classified local facilities as customer related and it was
6 therefore appropriate to include in the Residential Customer Charge, I opted to remain⁵
7 Charge and the exclusion of local facilities as my starting point.

8 **Q: So if the CCOS study results recommended \$17.83, how did you arrive at your**
9 **recommended \$14.99?**

10 A: Currently, Evergy's Residential Customer charge in both its Missouri jurisdictions is
11 \$12.00. It's my hope to keep the two charges the same in both Missouri jurisdictions.
12 With that goal in mind, I chose to recommend a Residential Customer Charge that
13 considered the CCOS results in this case and the potential Residential Customer Charge
14 that might result in a future MO Metro rate case. I referenced the last Evergy Missouri
15 Metro CCOS results and noted that excluding local facilities, the CCOS results from the
16 2022 rate case recommended a \$17.49 Residential Customer Charge. With the Test Year
17 cost of the current rate case CCOS study showing a recommended Residential Customer
18 Charge of \$15.68. I opted to recommend a charge just below at \$14.99.

19 **Q: Did you review MECG witness Kavita Maini's rebuttal testimony?**

20 A: Yes.

⁵ ER-2014-0370 Pg. 89 of Commission Report & Order.

1 **Q: Can you summarize her testimony?**

2 A: Ms. Maini largely takes issue with various positions taken by MPSC Staff. Specifically,
3 around revenue allocation and Staff's time variant overlay on C&I rates.

4 **Q: Do you agree with Ms. Maini's positions?**

5 A: While I maintain revenue allocation and rate design recommendations outlined in my
6 Direct testimony, I can appreciate that Ms. Maini's recommendations appear more
7 balanced as compared to Staff's and appear to not only consider cost causation, but
8 rate stability and the impact to customers. For more the Company's specific position on
9 these issues, please see the surrebuttal testimony of Company witness, Bradley Lutz.

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

11 A: Yes, it does.

TRUE-UP DIRECT TESTIMONY

OF

MARISOL E. MILLER

Case Nos. ER-2024-0189

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

2 A: My name is Marisol E. Miller. My business address is 1200 Main, Kansas City, Missouri
3 64105.

4 **Q: Are you the same Marisol E. Miller who filed Direct and Rebuttal testimony in this**
5 **docket?**

6 A: Yes.

7 **Q: On whose behalf are you testifying?**

8 A: I am testifying on behalf of Evergy Missouri West, Inc. d/b/a Evergy Missouri West
9 (“Evergy Missouri West” or “EMW”).

10 **Q: What is the purpose of your true-up direct testimony?**

11 A: The purpose of my testimony is to briefly discuss the changes to the retail revenue adjustment.

12 **Q: Please describe the process used to true-up retail revenues.**

13 A: The true-up adjustment for Retail Revenues reflects customer growth and accounts for the
14 customers switching rate classes where applicable through June, 2024. In addition, as
15 discussed in Company witness Albert Bass’s surrebuttal testimony the Company adjusted
16 the weather normalization period to January through December 2023 which aligned with
17 MPSC Staff’s direct case.

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

19 A: Yes, it does.

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

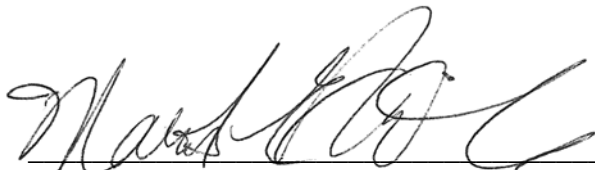
In the Matter of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West's Request for Authority to) Case No. ER-2024-0189
Implement A General Rate Increase for Electric)
Service)

AFFIDAVIT OF MARISOL E. MILLER

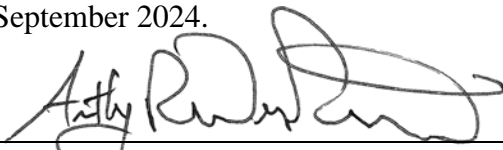
STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Marisol E. Miller, being first duly sworn on his oath, states:

1. My name is Marisol E. Miller. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Senior Manager – Regulatory Affairs.
2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of Evergy Missouri West consisting of seventeen (17) pages, 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.


_____)
Marisol E. Miller

Subscribed and sworn before me this 10th day of September 2024.


_____)
Notary Public

My commission expires: 4/26/2025

