

Exhibit No.:
Issue: Distribution System; Storm Reserve
Witness: Ryan Mulvany
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Evergy Missouri West
Case No.: ER-2024-0189
Date Testimony Prepared: September 10, 2024

MISSOURI PUBLIC SERVICE COMMISSION

CASE NOS.: ER-2024-0189

SURREBUTTAL TESTIMONY

OF

RYAN P. MULVANY

ON BEHALF OF

EVERGY MISSOURI WEST

**Kansas City, Missouri
February 2024**

SURREBUTTAL TESTIMONY

OF

RYAN MULVANY

Case No. ER-2024-0189

1

I. INTRODUCTION

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

3 A: My name is Ryan P. Mulvany. My business address is 1200 Main, Kansas City,
4 Missouri 64105.

5 **Q: Are you the same Ryan P. Mulvany who filed direct testimony on February 2,**
6 **2024?**

7 A: I am.

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

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

11 **Q: What is the purpose of your surrebuttal testimony?**

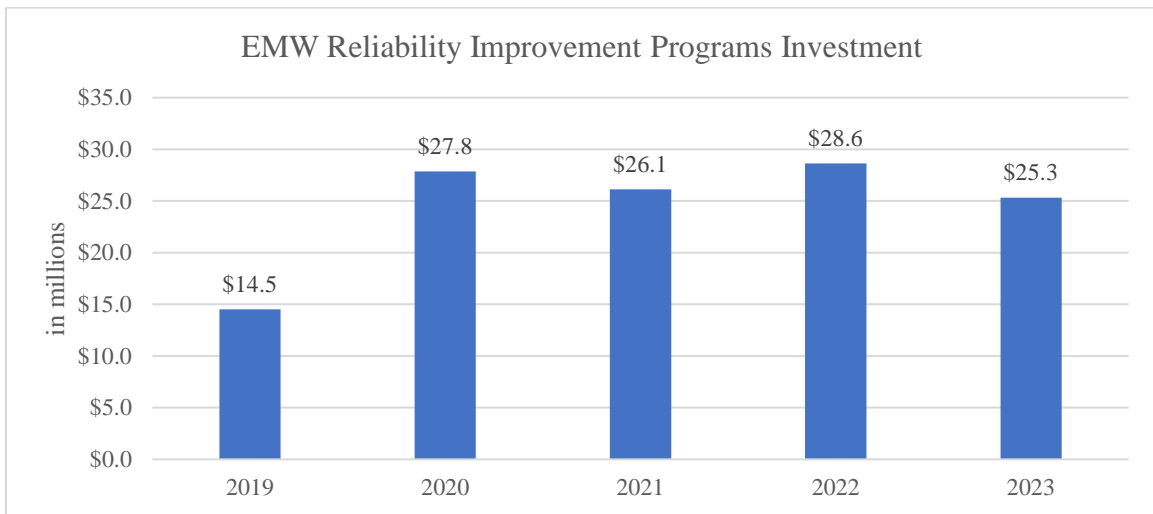
12 A: I am responding to the rebuttal testimony of Missouri Public Service Commission
13 (“MPSC” or the “Commission”) Staff (“Staff”) witness Claire M. Eubanks
14 testimony regarding distribution system reliability and capital investments.

15 **Q: How would you describe Evergy’s transmission and distribution (“T&D”)**
16 **capital investment levels related to Evergy Missouri West’s reliability**
17 **improvements?**

18 A: Evergy Missouri West is committed to reliability and the commitment is evident in
19 the Annual Reliability Improvement Plan, which outlines distribution asset

1 management program investments aimed at maintaining or improving reliability.
2 Asset management programs are structured around key asset types, such a pole and
3 cables, or grouping of assets like laterals. These programs allow for a targeted
4 approached in identifying and targeting assets for replacement prior to failure based
5 on condition and risk of failure. The historical actual data provided in Figure 1
6 below since 2019 reflects a significant increase in investments towards reliability
7 programs, growing from \$14.5 million to \$25.3 million. This upward trend
8 demonstrates an average investment level of \$24.5 million over the past five years,
9 showcasing Evergy Missouri West's consistent investment to improving
10 distribution reliability.

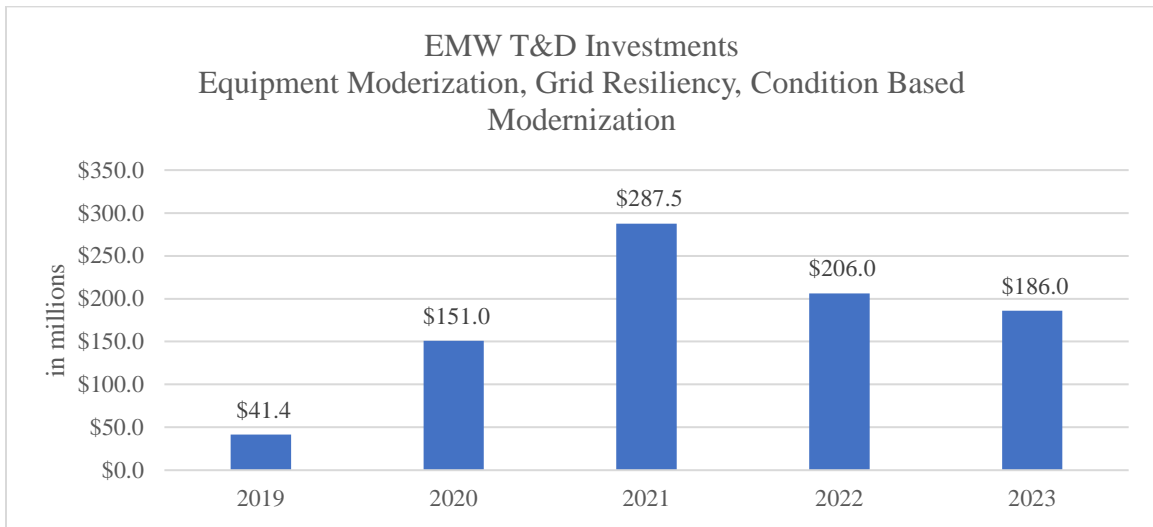
11 **Figure 1**



12
13 The enhancement of reliability within the Evergy Missouri West jurisdiction is a
14 multifaceted endeavor, where distribution asset management programs form just
15 one aspect. The Company's comprehensive approach includes a significant increase
16 in the total annual Capital Investment Plan from 2019 levels as shown in Figure 2.
17 This plan emphasizes T&D equipment modernization and grid resiliency, crucial

1 areas that have seen substantial investment. On average, \$174.4 million has been
2 allocated across these categories, underscoring the Company's commitment to
3 maintaining and improving the reliability of service.

4 **Figure 2**



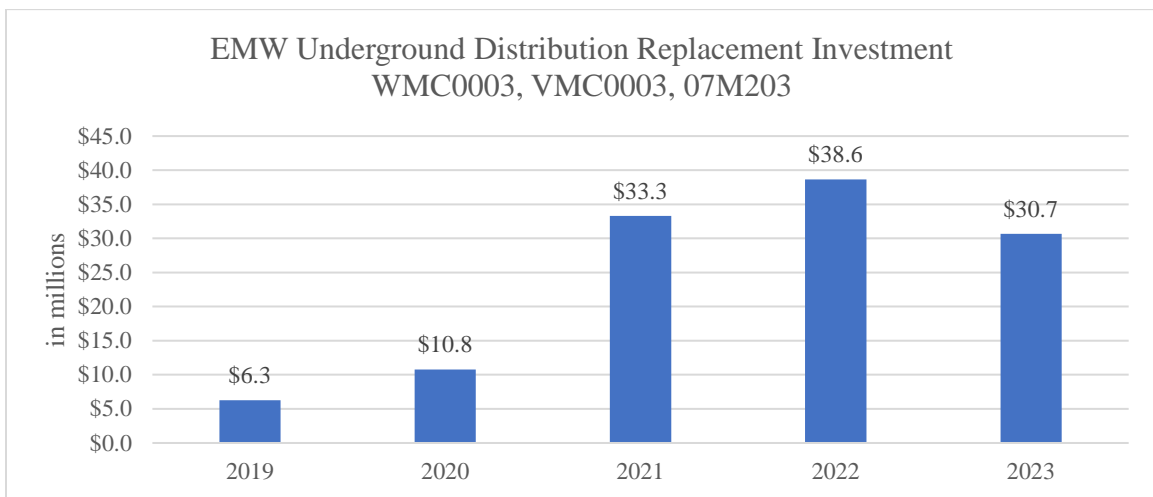
5

6 **Q: Are there any other initiatives that the Company has developed to target**
7 **reliability performance?**

8 **A:** In 2020, Evergy Missouri West adopted a practice to replace direct buried
9 underground residential design (URD) cable upon first failure. The focus on
10 replacement of direct buried underground residential distribution cable is intended
11 to reduce the frequency of repeated cable failures due to aged cable infrastructure
12 and minimizes the impact to customers by eliminating multiple outages and
13 repeated visits. Prior to this policy change, direct buried URD cables were
14 considered for replacement with new cable in conduit after a second failure through
15 an asset management reactive cable replacement program. Funding levels of the
16 old asset management replacement program were not adequate to replace all cables
17 in a reasonable time frame. Therefore, cable replacements were prioritized based

1 on risk and customer impact. The new enhanced reactive approach to replacing
2 failed URD cable and the dollars budgeted do not reside in an asset management
3 program but rather in a break/fix annual capital expenditure account. Since the
4 Company adopted the new practice, actual Evergy Missouri West investment in
5 URD cable replacements have increased since 2019, as depicted in the Figure 3
6 below, with an average investment of \$34.2 million from 2021 through 2023.

7 **Figure 3**



8

9 **Q: Ms. Eubanks’ testimony points out that Evergy Missouri West’s Customer**
10 **Average Interruption Frequency Index (“CAIFI”) performance has trended**
11 **toward poorer performance. What steps has EMW taken to improve CAIFI?**

12 **A:** Evergy Missouri West has established a new asset management program to target
13 improving Customers Experience Multiple Interruptions (“CEMI”), which is a
14 similar metric as CAIFI. Prior to implementing the CEMI program in 2023,
15 improving reliability for customers experiencing repeated outages was limited to
16 the Worst Performing Circuit (“WPC”) or lateral improvement programs. Both
17 programs are highly influenced by either customer density or circuit length (risk

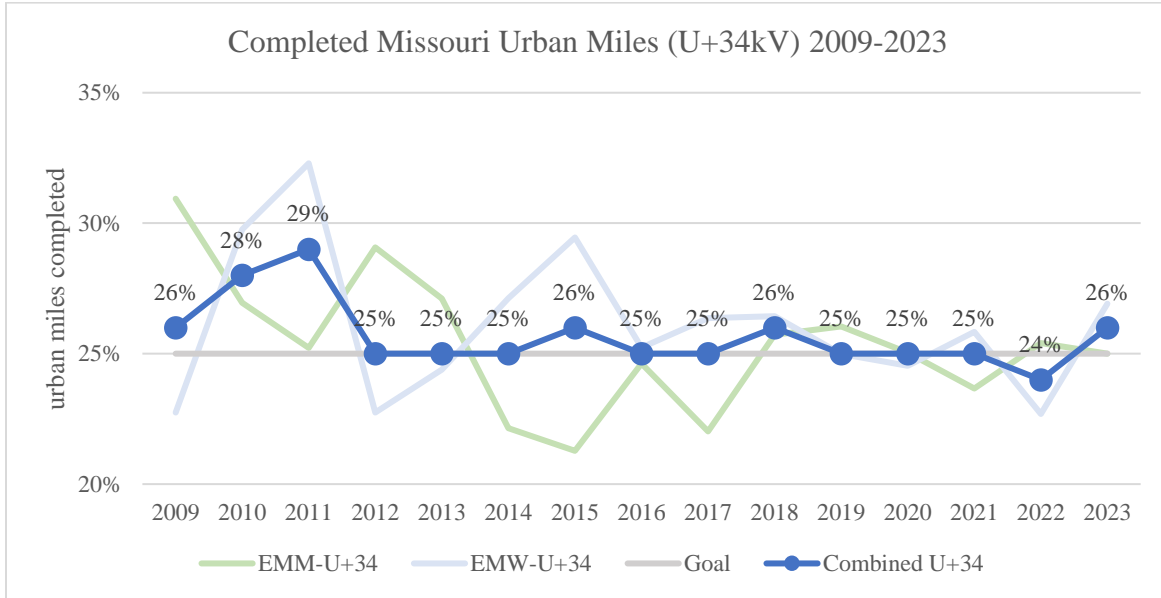
1 exposure) to prioritize investment. An isolated customer with poor reliability
2 performance compared to their peer customers on their individual circuit will not
3 be prioritized through those individual programs. The CEMI program highlights
4 customers that need attention independent of how they are served on the
5 distribution system, and as the CEMI program matures over the next several years
6 in the Evergy Missouri West jurisdiction, we expect to see improved metrics.

7 **Q: Can you address Staff's concerns related to Evergy Missouri West's**
8 **compliance with the Commission's vegetation management standards by**
9 **describing the Company's approach to comply with Commission Rule 20 CSR**
10 **4240-23.030(9)(A)5?**

11 A: Since the inception of 20 CSR 4240-23.030(9)(A)5, Evergy has managed Missouri
12 vegetation operations as a combined entity (Evergy Missouri Metro and Evergy
13 Missouri West). As reported in the annual vegetation management filings with the
14 Commission, Figure 4 below illustrates this operational practice and reflects
15 completed Urban and 34kV miles from 2009 through 2023 for the combined entity.

1

Figure 4



2

3 **Q: In the above chart, Evergy reports 24% of Urban miles completed in 2022.**

4 **Can you please explain the shortfall and action taken to remedy the shortfall?**

5 A: In 2022, Evergy completed 24% of the combined Urban and 34kV mileage. The
 6 deficit of 1% is representative of approximately three days of vegetation
 7 management work within Evergy Missouri West and underscores the influence of
 8 unpredictable factors like weather conditions impacting scheduled work and
 9 emergency storm response support. The remaining 1% of Evergy Missouri West
 10 vegetation management work was completed in January 2023, as represented by
 11 the 26% reported.

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

13 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 RYAN P. MULVANY

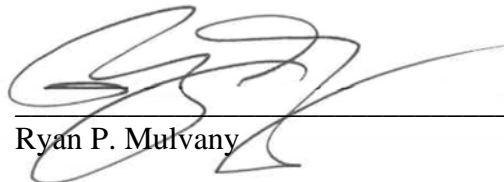
STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Ryan P. Mulvany, being first duly sworn on his oath, states:

1. My name is Ryan P. Mulvany. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Vice President Distribution – Power Delivery Administration.

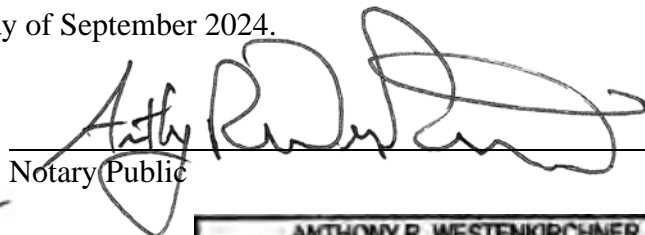
2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of Evergy Missouri West consisting of six (6) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

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.



Ryan P. Mulvany

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



Notary Public

My commission expires: 4/26/2025

