

Exhibit No.:
Issue(s): MEEIA
Witness: Hari K Poudel, PhD
Sponsoring Party: MoPSC Staff
Type of Exhibit: Surrebuttal/True-Up
Rebuttal Testimony
Case No.: ER-2024-0189
Date Testimony Prepared: September 18, 2024

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

TRUE-UP / REBUTTAL 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 18, 2024

1 in their calculation of realized kWh savings for January 2023; Staff did not.
2 For February 2023 kWh savings, Staff used the cumulative savings from the prior month rather
3 than the savings acquired from July 2022. Mr. Bass did not adopt the same methodology of
4 using the preceding time frame in this rate case. Instead, he used a greater number of preceding
5 months than in the prior rate case. No rational explanation is provided in his testimonies.

6 Q. Do you agree with Bass's approach of computing realized kWh savings?

7 A. No. The realized kWh savings is the result of the monthly deemed kWh savings
8 and the load shape of a particular measure. In determining realized kWh savings for each
9 measure category and rate class, Staff utilized only the kWh savings from the preceding month.
10 However, Bass utilized the cumulative kWh savings from the preceding months for each
11 measure and rate class. Staff disagrees with his methodology of including the kWh savings
12 from all prior months when computing the realized kWh savings. As part of the true-up filing
13 in Evergy's most recent rate case,² Staff and Evergy both utilized an approach similar to Staff's
14 adjustment method in this case. However, in this case Evergy witness Bass appears to alter the
15 method for calculating the EMW MEEIA true-up adjustment.³

16 Q. Could you please describe Mr. Bass's alternative approach?

17 A. Mr. Bass used all the kWh savings from all prior months for each measure and
18 rate class in this rate case.

19 Q. Did EMW provide testimony regarding the change in method from its last
20 general rate case to this one?

21 A. No.

² ER-2022-0130

³File name: "kWh-kW Savings MO West MEEIA TY 01012021-12312021 true-up to 05312022 update draft1"
ER-2022-0130

1 Q. Do you believe that the time frame difference may contribute to the variations
2 in the MEEIA adjustment between Staff and EMW?

3 A. Yes, although there may also be some additional differences in the application
4 of the MEEIA adjustments for the LPS class based upon data availability.

5 Q. Did Staff perform any MEEIA annualization adjustments for the LPS rate class
6 during the true-up period?

7 A. Yes. Staff ran the MEEIA annualization adjustment for the LPS rate class but at
8 that time did not have true-up period information provided by EMW at the customer level.⁴

9 **CONCLUSION**

10 Q. Does this conclude your true-up rebuttal testimony?

11 A. Yes, it does.

⁴ DR242 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) Case No. ER-2024-0189
Authority to Implement A General Rate)
Increase for Electric Service)

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 *True-Up Rebuttal 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.

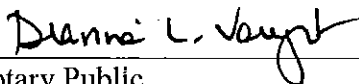


HARI K. POUDEL, PhD

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 16th day of September 2024.

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: July 18, 2027 Commission Number: 15207377



Notary Public