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	TRUE-UP REBUTTAL TESTIMONY		
2	OF		
3	HARI K. POUDEL, PhD		
4 5 6	EVERGY MISSOURI WEST, INC., d/b/a Evergy Missouri West		
7	CASE NO. ER-2024-0189		
8	Q. Please state your name and business address.		
9	A. My 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, rebuttal, and		
12	surrebuttal/true-up direct testimonies in this case?		
13	A. Yes.		
14	EXECUTIVE SUMMARY		
15	Q. What is the purpose of your true-up rebuttal testimony?		
16	A. The purpose of this true-up rebuttal testimony is to respond to		
17	Evergy Missouri West ("EMW") witness Al Bass' true-up adjustment regarding the		
18	Missouri Energy Efficiency Investment Act (MEEIA) adjustment analysis in the true-up period.		
19	MEEIA ANNUALIZATION ADJUSTMENT		
20	Q. Are there any differences in the MEEIA adjustment between Staff and EMW for		
21	Residential, SGS, MGS, and LGS classes?		
22	A. Yes. Staff noticed a difference in the kWh savings while computing the Realized		
23	kWh savings in Bass's workpapers. <sup>1</sup> EMW included kWh savings from July to December 2022		

<sup>&</sup>lt;sup>1</sup> File name: "kWh-kW Savings MO West MEEIA TY 07012022-06302023 draft3 06302024 update" ER-2024-0189

# True-up Rebuttal Testimony of Hari K. Poudel, PhD

in their calculation of realized kWh savings for January 2023; Staff did not.
For February 2023 kWh savings, Staff used the cumulative savings from the prior month rather
than the savings acquired from July 2022. Mr. Bass did not adopt the same methodology of
using the preceding time frame in this rate case. Instead, he used a greater number of preceding
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 No. The realized kWh savings is the result of the monthly deemed kWh savings A. 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 avings 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,<sup>2</sup> 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 method for calculating the EMW MEEIA true-up adjustment.<sup>3</sup> 15

16

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

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

- Q. Did EMW provide testimony regarding the change in method from its lastgeneral rate case to this one?
- 21

A. No.

<sup>2</sup> ER-2022-0130

<sup>&</sup>lt;sup>3</sup>File name: "kWh-kW Savings MO West MEEIA TY 01012021-12312021 true-up to 05312022 update draft1" ER-2022-0130

True-up Rebuttal Testimony of Hari K. Poudel, PhD

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	А.	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	e-up period?
7	А.	Yes. Staff ran the MEEIA annualization adjustment for the LPS rate class but at
8	that time did 1	not have true-up period information provided by EMW at the customer level. <sup>4</sup>
9	<u>CONCLUSI</u>	<u>ON</u>
10	Q.	Does this conclude your true-up rebuttal testimony?
11	А.	Yes, it does.

<sup>&</sup>lt;sup>4</sup> DR242 ER-2024-0189.

#### BEFORE THE PUBLIC SERVICE COMMISSION

#### **OF THE STATE OF MISSOURI**

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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 *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

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  $\__{lb}^{++}$  day of September 2024.

JURAT

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

Dianne L. Vought Notary Public