

Public Version

Exhibit No.:

Issue: Crossroads; AAR; TCR

Witness: Hsin Foo

Type of Exhibit: True-Up Rebuttal Testimony

Sponsoring Party: Evergy Missouri West

Case No.: ER-2024-0189

Date Testimony Prepared: September 18, 2024

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NOS.: ER-2024-0189**

**TRUE-UP REBUTTAL TESTIMONY**

**OF**

**HSIN FOO**

**ON BEHALF OF**

**EVERGY MISSOURI WEST**

**Kansas City, Missouri**

**September 2024**

**TRUE-UP REBUTTAL TESTIMONY**

**OF**

**HSIN FOO**

**Case No. ER-2024-0189**

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

2 A: My name is Hsin Foo. My business address is 1200 Main Street, Kansas City,  
3 Missouri 64105.

4 **Q: Are you the same Hsin Foo who submitted direct testimony on February 2,**  
5 **2024, rebuttal on August 6, 2024, and surrebuttal/true-up direct on September**  
6 **10, 2024?**

7 A: Yes.

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

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

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

12 A: The purpose of my testimony is to address the Energy Payment Rate for the Ensign  
13 wind farm as discussed in Staff witness Brodrick Niemeier’s True-Up Direct  
14 testimony, and the adjustments, as it relates to NUCOR discussed in Staff witness  
15 Justin Tevie’s True-Up Direct testimony.

16 **I. ENSIGN ENERGY PAYMENT RATE**

17 **Q: What is the appropriate Energy Payment Rate for Ensign?**

18 A: The Energy Payment Rate for Ensign should be \*\*[REDACTED]\*\* per MWh. The amount  
19 that Staff Witness Niemeier describes in his Surrebuttal testimony on Page 4, lines

**CONFIDENTIAL**

1 5-8 is correct. An error on the Energy Payment Rate for Ensign was made in  
2 Company Witness Foo's Rebuttal testimony.

3 **Q: Was \*\* [REDACTED] \*\* the amount that was used in the Company's production cost  
4 model for True-Up?**

5 A: Yes.

## 6 II. NUCOR

7 **Q: What period did Staff witness Mr. Tevie use to determine the amount of under  
8 recovery for True-Up?**

9 A: Staff witness Tevie used the 12-month period ending June 30, 2024.

10 **Q: Do you agree with Staff's methodology?**

11 A: No. Staff's calculation of fuel and purchase power expense uses normalized values  
12 from their production cost model, but Staff witness Mr. Tevie uses historical  
13 amounts. NUCOR's load costs and revenues are intrinsically included in the  
14 production cost model and therefore, in the fuel and purchase power expense  
15 amounts. These revenues and expenses should stay consistent throughout the case.  
16 It is contradictory to use normalized values in one calculation and a different  
17 method representing the same concept in another calculation. This approach is  
18 incorrect and lacks coherence.

19 **Q: What do you recommend?**

20 A: The costs and revenues associated with NUCOR should be consistent in all  
21 calculations throughout the case. It is recommended that the normalized values be  
22 applied for the same reasons that normalized fuel and purchase power expenses are  
23 used - to eliminate irregularities and anomalies that might bias the calculation.

1 Q: Does that conclude your True-Up Direct testimony?

2 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 HSIN FOO**

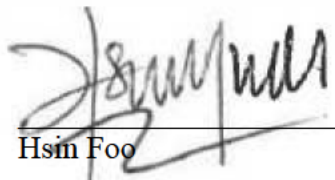
**STATE OF MISSOURI     )**  
   ) **ss**  
**COUNTY OF JACKSON    )**

Hsin Foo, being first duly sworn on his oath, states:

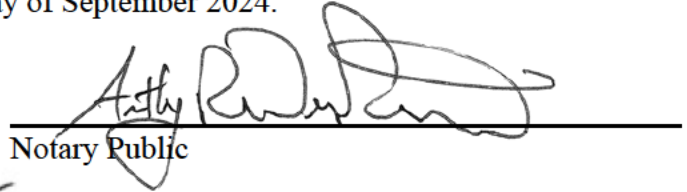
1.     My name is Hsin Foo I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Lead Quantitative Analyst-Generation Resources.

2.     Attached hereto and made a part hereof for all purposes is my True-Up Rebuttal Testimony on behalf of Evergy Missouri West consisting of three (3) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

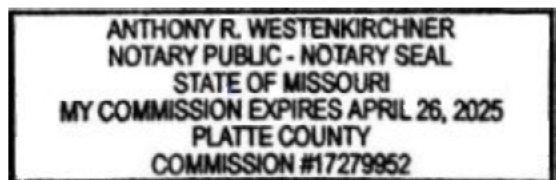
3.     I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Hsin Foo

Subscribed and sworn before me this 18<sup>th</sup> day of September 2024.

  
\_\_\_\_\_  
Notary Public

My commission expires: 4/26/2025



**Evergy Metro, Inc. d/b/a Evergy Missouri Metro and  
Evergy Missouri West, Inc. d/b/a Evergy Missouri West**

Docket No.: ER-2024-0189

Date: September 18, 2024

CONFIDENTIAL INFORMATION

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The following information is provided to the Missouri Public Service Commission under CONFIDENTIAL SEAL:

Document/Page	Reason for Confidentiality from List Below
True-Up Rebuttal p. 1, ln. 18	3, 4, and 6
True-Up Rebuttal, p. 2, ln. 3	3, 4, and 6

Rationale for the “confidential” designation pursuant to 20 CSR 4240-2.135 is documented below:

1. Customer-specific information;
2. Employee-sensitive personnel information;
3. Marketing analysis or other market-specific information relating to services offered in competition with others;
4. Marketing analysis or other market-specific information relating to goods or services purchased or acquired for use by a company in providing services to customers;
5. Reports, work papers, or other documentation related to work produced by internal or external auditors, consultants, or attorneys, except that total amounts billed by each external auditor, consultant, or attorney for services related to general rate proceedings shall always be public;
6. Strategies employed, to be employed, or under consideration in contract negotiations;
7. Relating to the security of a company's facilities; or
8. Concerning trade secrets, as defined in section 417.453, RSMo.
9. Other (specify) \_\_\_\_\_.

Should any party challenge the Company’s assertion of confidentiality with respect to the above information, the Company reserves the right to supplement the rationale contained herein with additional factual or legal information.