

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

In the Matter of Evergy Metro, Inc. d/b/a Evergy)
Missouri Metro’s Request for Authority to) Case No. ER-2022-0129
Implement A General Rate Increase for Electric)
Service)

In the Matter of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West’s Request for Authority to) Case No. ER-2022-0130
Implement A General Rate Increase for Electric)
Service)

NOTICE OF ERRATA TO REBUTTAL TESTIMONY OF MARISOL E. MILLER

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“EMM”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“EMW”) (collectively, the “Company”), and for its *Notice of Errata to Rebuttal Testimony of Marisol E. Miller* (“Errata”), states as follows:

1. On July 13, 2022, the Company filed the rebuttal testimony of Marisol E. Miller (“Miller Rebuttal”).

2. After filing, the Company discovered several unintentional errors in the Miller Rebuttal, as detailed below:

- (i) Page 15, ln. 8: change \$10 to \$11.55
- (ii) Page 15, ln. 14: change \$10 to \$11.55
- (iii) Page 15, ln. 22: change \$10 to \$11.55

3. Attached hereto is both a clean and redlined copy of the updated page 15 with the corrections detailed above.

4. The Company does not believe submitting these corrections will prejudice any party’s ability to address the underlying testimony in surrebuttal.

WHEREFORE, EMM and EMW submit this Errata to the Missouri Public Service Commission (“Commission”).

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorneys for Evergy Missouri Metro and Evergy
Missouri West**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served upon counsel for all parties on this 15th day of July 2022, by either e-mail or U.S. Mail, postage prepaid.

/s/ Roger W. Steiner

Roger W. Steiner

1 **Q: Did the Company’s proposal for the Residential customer charge in this rate case**
2 **proceeding include the same cost accounts as listed above, that include allocated**
3 **costs?**

4 A: Yes. Given this long history acknowledging full customer costs (even allocated ones), as
5 well as, the allocators used by the Company, it’s perplexing to hear Staff needing to create
6 a new allocator to allocate customer costs. When comparing Staff’s customer costs of
7 \$30.2M for Evergy Missouri Metro and an overall customer charge recommendation of
8 \$11.550 and the Company’s customer costs of \$54.6M for Evergy Missouri Metro and
9 \$75.7M for Evergy Missouri West with a recommendation of \$16, the difference is stark.
10 While a portion of that could be driven by differences in rate increase, etc., the significance
11 in the difference points to material omission by Staff in this rate case. When the Company
12 reviewed the 2018 rate cases and the Staff’s recommended customer charges of \$12.82 for
13 Evergy Missouri Metro and \$12.38 for Evergy Missouri West, which are higher than the
14 current 2022 recommendation of MPSC Staff of ~~\$11.5510~~, it is particularly unexpected
15 because it would not be reasonable to assume that customer/fixed costs have gone down
16 since 2018. It would appear that Staff has changed their approach significantly. Any
17 change in approach that results in a reduction of customer costs that substantial and changes
18 the consistency to historical results should raise questions and potential concern regarding
19 the reliability of data/recommendation. The Company's concerns over the reliability of
20 Staff's recommendation were even greater in Evergy Missouri West given the lack of
21 supporting data provided. Unlike in Evergy Missouri Metro, Staff did not provide the
22 Company with analysis to support their \$11.550 customer charge recommendation in
23 Evergy Missouri West.

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