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Service Commission

Exhibit No. 103

Evergy Missouri West – Exhibit 103
Albert R. Bass, Jr.
Surrebuttal
File No. ER-2024-0189

Exhibit No.:
Issue: Weather Normalization;
Net-metered customers
Witness: Albert R. Bass, Jr.
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 NO.: ER-2024-0189

SURREBUTTAL TESTIMONY

OF

ALBERT R. BASS, JR.

ON BEHALF OF

EVERGY MISSOURI WEST

**Kansas City, Missouri
September 2024**

SURREBUTTAL TESTIMONY

OF

ALBERT R. BASS, JR.

Case No. ER-2024-0189

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

2 A: My name is Albert R. Bass, Jr. My business address is 1200 Main, Kansas City, Missouri
3 64105.

4 **Q: Are you the same Albert R. Bass, Jr. who submitted direct testimony in this docket**
5 **on February 2, 2024 and rebuttal testimony on August 6, 2024?**

6 A: Yes.

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

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

10 **Q: What is the purpose of your Surrebuttal testimony?**

11 A: The purpose of my Surrebuttal testimony is to:

12 1. Address Missouri Public Service Commission staff (“Staff”) witness Francisco Del
13 Pozo’s assertion of using two time periods for weather normalization.

14 2. Address Staff witness Michael Stahlman’s concerns with net-metered customers.

1 **WEATHER NORMALIZATION**

2 **Q: Did the Company use two different 30-year normal weather baselines when**
3 **calculating weather normalization adjustments as indicated in Staff witness**
4 **Francisco Del Pozo's rebuttal testimony?**

5 A: No. The Company used the 30-year period 1991-2020 to calculate normal weather
6 temperatures.

7 **Q: Why are the prior period temperatures different?**

8 A: The prior period weather was calculated at a different point in time, prior to this case. For
9 consistency you would not go back and change weather or weather normalization
10 adjustments made in a prior period.

11 **Q: Was prior weather period data used in this case?**

12 A: No. The temperatures that are assigned to dates prior to July 1, 2022 (outside of the test
13 year) are not applicable to any calculated normal weather adjustments used by the
14 Company in its direct filing, update filing or true-up filing.

15 **NET-METERED CUSTOMERS**

16 **Q: Do you agree with Michael Stahlman's assessment of net-metering customers?**

17 A: Yes; however, there are currently only 4,970 net-metering customers out of a total
18 residential population of 301,973 customers (or 1.6% of the total residential class) as of
19 June 2024. The impact upon the total case or the residential class itself would be marginal
20 at best if not a minimal impact.

21 **Q: Does the Company have net-metered customers data broken out separately?**

22 A: No. The Company will have to assess the availability of the data and the necessary steps to
23 separate the net-metering customers from residential class.

1 **Q: Is the Company willing to look at analyzing net-metered customers separately?**

2 A: Yes. The Company is willing to work with Staff in looking at weather normalizing net-
3 metered customers as a separate class should the data be available to allow analyzing them
4 separately.

5 **Q: Does the Company have concerns with analyzing net-meter customers separately?**

6 A: Yes. Staff has indicated interest in analyzing each time-of-use (TOU) rate separately. If
7 net-metering customers have the option of moving to a TOU rate, then there would be two
8 different analyses for each Residential rate code, one for net metering and one for non-net-
9 metering. This would result in many different iterations of analyses based on small subsets
10 of customers with low statistical power. With Staff's continued desire for additional
11 granularity of data, as well, as, increased speed for the delivery of data/analyses, the
12 Company is very wary of the increased cost, effort, and potential errors more than
13 offsetting any potential benefits of increasing differentiation between customer groups.
14 These concerns include: (1) increased level of effort to complete each analysis, (2) lower
15 statistical power in weather normalization, and (3) increased estimation error in weather
16 normalization due to the inherent estimation error in weather normalization.

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

18 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 ALBERT R. BASS, JR.

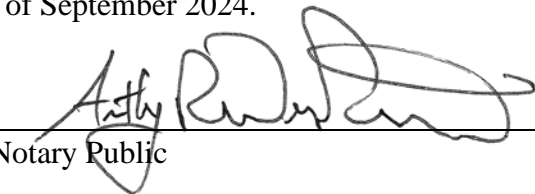
STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Albert R. Bass, Jr., being first duly sworn on his oath, states:

1. My name is Albert R. Bass, Jr. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Sr. Manager of Energy Forecasting and Analytics.
2. Attached hereto and made a part hereof for all purposes is my Surrebuttal 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.


Albert R. Bass, Jr.

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


Notary Public

My commission expires: 4/26/2025

