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# Exhibit No. 115

Evergy Missouri West – Exhibit 115  
Hsin Foo  
Direct  
File No. ER-2024-0189

Public Version

Exhibit No.:  
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Power and Off-system Sales Normalization;  
FAC Requirements  
Witness: Hsin Foo  
Type of Exhibit: Direct Testimony  
Sponsoring Party: Evergy Missouri West  
Case No.: ER-2024-0189  
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**MISSOURI PUBLIC SERVICE COMMISSION**

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

**DIRECT TESTIMONY**

**OF**

**HSIN FOO**

**ON BEHALF OF**

**EVERGY MISSOURI WEST**

**Kansas City, Missouri  
February 2024**

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**DIRECT 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: By whom and in what capacity are you employed?**

5 A: I am employed by Evergy Metro, Inc. and serve as Lead Quantitative Analyst-  
6 Generation Resources for Evergy Metro, Inc. d/b/a as Evergy Missouri Metro  
7 (“Evergy Missouri Metro”), Evergy Missouri West, Inc. d/b/a Evergy Missouri  
8 West (“Evergy Missouri West”), Evergy Metro, Inc. d/b/a Evergy Kansas Metro  
9 (“Evergy Kansas Metro”), and Evergy Kansas Central, Inc. and Evergy South, Inc.,  
10 collectively d/b/a as Evergy Kansas Central (“Evergy Kansas Central”) the  
11 operating utilities of Evergy, Inc.

12 **Q: Who are you testifying for?**

13 A: I am testifying on behalf of Evergy Missouri West.

14 **Q: What are your responsibilities?**

15 A: My primary responsibilities include developing and managing PROMOD<sup>®</sup> IV  
16 (“PROMOD”) models, providing electric price forecasting and analysis in support  
17 of power marketing analytics, market modeling and fuel management.

1 **Q: Please describe your education, experience and employment history.**

2 A: I graduated from the University of Michigan in May 2004 with a Bachelor of  
3 Science degree in Industrial & Operations Engineering. In May 2010, I received  
4 Master of Science degrees in Financial Engineering and Mathematics from  
5 Claremont Graduate University.

6 I began my career with DTE Energy in 2004 in the Market Intelligence  
7 group as a Programmer Analyst. My primary responsibilities were to perform  
8 energy industry simulation runs using the PROMOD model, and to perform market  
9 research and analysis to develop a corporate view on economic fundamentals in  
10 support of generation, fuel, and emissions operations. In 2007, I joined 330  
11 Investment Management, a hedge fund in Chicago, as an associate where my role  
12 was to model and analyze transmission congestion to support Financial  
13 Transmission Rights (“FTR”) trading activity in the Midcontinent Independent  
14 System Operator (“MISO”), PJM Interconnection, LLC (“PJM”), New York  
15 Independent System Operator (“NYISO”) and ISO New England (“NEPOOL”)  
16 markets.

17 My employment at Kansas City Power & Light Company (“KCPL”) began  
18 in 2010 as a Quantitative Analyst where my primary responsibility was to develop  
19 a Southwest Power Pool (“SPP”) focused electric generation and transmission  
20 fundamental model using PROMOD in anticipation of the Southwest Power Pool  
21 Integrated Marketplace (“SPP IM”). Since then, I have been promoted to Senior  
22 Quantitative Analyst and most recently, Lead Quantitative Analyst, where I am one  
23 of the company’s principal PROMOD modelers.

1 **Q: Have you previously testified in a proceeding at the Missouri Public Service**  
2 **Commission (“MPSC” or “Commission”) or before any other utility**  
3 **regulatory agency?**

4 A: No.

5 **Q: What is the purpose of your direct testimony?**

6 A: The purpose of my direct testimony is to describe the level of fuel expense,  
7 purchase power expense and the wholesale sales revenues filed in the Direct  
8 Testimony of Company witness Ronald A. Klote. I will also provide information  
9 regarding the requirements necessary to support the request for continuation of  
10 Evergy Missouri West’s Fuel Adjustment Clause (“FAC”). I specifically address  
11 all or a portion of the requirements of 20 CSR 4240-20.090(2)(A) 15, 16, and 17.

#### 12 **I. ENERGY PRICE FORECASTING**

13 **Q: Please describe how Evergy Missouri West forecasts electricity prices.**

14 A: Evergy Missouri West utilizes PROMOD, a modeling software that is similar to  
15 other fundamental price forecasting models that are commonly used in the industry.  
16 PROMOD is provided by Hitachi Energy (formerly ABB). PROMOD incorporates  
17 details in generating unit operating characteristics, transmission grid topology and  
18 constraints, and market system operations to simulate power flows within and  
19 between various energy markets, including but not limited to, Independent System  
20 Operators (“ISOs”), Regional Transmission Organizations (“RTOs”), and other  
21 North American Electric Reliability Corporation (“NERC”) regions. PROMOD  
22 performs a security constrained unit commitment and co-optimized economic  
23 dispatch to generate Locational Marginal Prices (“LMPs”) at the nodal level,

1 similar to how ISOs and RTOs set schedules and determine prices. The Company  
2 uses PROMOD for various purposes, such as generating market price forecasts,  
3 supporting resource planning decisions, fuel and interchange budgeting, and  
4 purchasing and sales analysis.

5 **Q: What are the primary inputs to the model?**

6 A: The model utilizes a sizeable input dataset that is populated with assumptions about  
7 market supply, demand, and transmission. The bulk of the input assumptions use  
8 NERC reports, Federal Energy Regulatory Commission (“FERC”) Form 1 data,  
9 Energy Information Administration (“EIA”) 411 reports, Continuous Emissions  
10 Monitoring System (“CEMS”) data compiled by the Environmental Protection  
11 Agency (“EPA”), and publicly available data reported by the various ISOs and  
12 RTOs as sources. The demand data includes projected hourly demand for virtually  
13 every electric power entity in the Eastern Interconnect. The supply data contains a  
14 representation of all generating units within those entities and their operating  
15 characteristics, including but not limited to, capacity, heat rate, fuel type, variable  
16 operations and maintenance costs, outage rates, emissions rates, and start-up costs.  
17 Other primary inputs are fuel (e.g., coal, natural gas, fuel oil) prices, emission  
18 allowance prices, renewable energy generation, reserve requirements, hurdle rates,  
19 and import/exports to external areas. The dataset also includes detailed  
20 transmission grid topology, transmission constraints and contingency events within  
21 and between regions.

1 **Q: How does the model use this data to forecast power prices?**

2 A: PROMOD performs an hourly chronological commitment and dispatch of available  
3 generation resources to meet projected hourly demand in each region, as defined in  
4 the model's geographic topology. For each hour, the model calculates the cost of  
5 generation, comprised of the production cost of the least-cost generating unit  
6 needed to meet demand. The model also determines the hourly cost of congestion,  
7 which is the added cost of needing higher-cost generators due to transmission  
8 constraints. Both the cost of generation and the cost of congestion make up the  
9 hourly power price, or LMP. Hourly LMPs are generated across the model  
10 footprint at the nodal level; this means generators at different locations may have  
11 different LMPs in each hour. The model aims to minimize these system costs while  
12 simultaneously adhering to operating constraints and transmission grid limitations  
13 to meet load reliably. This is comparable to how SPP, the RTO in which the  
14 Company resides, calculates its power prices.

15 **Q: Is this done for only one region?**

16 A: No. Our model footprint includes SPP, MISO, PJM, Associated Electric  
17 Cooperative Inc. ("AECI"), Southwestern Power Administration ("SPA"),  
18 Tennessee Valley Authority ("TVA"), and Louisville Gas and Electric Company  
19 and Kentucky Utilities Company ("LGE/KU"). The model also includes imports  
20 and exports across the high-voltage direct current ("HVDC") ties which connect  
21 SPP to the Western Interconnect and the ERCOT Texas Interconnect, as well as  
22 other external areas that are not dynamically modeled (e.g., Florida, NYISO, etc.).



1 Units may be economically dispatched to serve load in a neighboring region if  
2 transmission capacity exists.

3 **Q: What is your opinion of the resulting forecasts?**

4 A: The fundamental supply and demand data are relatively good. The demand forecast  
5 from utilities and the existing public data on installed generation capacity are  
6 sufficiently reliable, so that identifying a reasonable unit to base an hourly price on  
7 is something that can be done with a reasonable degree of confidence. The input  
8 assumptions that create a larger challenge are fuel price and wind, as discussed  
9 below. In SPP, Evergy Missouri West's market area, the market price is usually  
10 set by one of three fuels: wind, coal or natural gas. Wind generation is typically  
11 the marginal resource during off-peak hours, while coal or gas is largely the  
12 marginal resource during on-peak hours in SPP.

13 **Q: How difficult is it to predict the price of coal and natural gas?**

14 A: Coal prices are relatively stable and the model inputs are based on actual reported  
15 fuel costs, so the impact of coal on power prices can be forecasted with relative  
16 accuracy when coal is the marginal fuel. Natural gas prices are more volatile and  
17 difficult to predict.

18 **Q: How difficult is it to predict wind generation?**

19 A: Wind production, and therefore generation from wind farms, can be erratic and  
20 unpredictable. In 2022, wind generation served a record-breaking 88.5% of SPP  
21 load. There were also periods during which wind made up as little as 1.5% of SPP's  
22 total generation. Schedule HYF-1 shows the volatility of wind generation in SPP  
23 from December 2022 to November 2023. Large swings in generation from wind

1 farms can happen over a very short period, which can have a sizeable impact on  
2 transmission congestion, and in turn impact LMPs. The natural variability of wind  
3 makes it difficult to predict power prices.

4 **Q: How accurate are the power price forecasts?**

5 A: The power price forecasts are relatively accurate when the load forecast, fuel price  
6 forecast, and wind forecast are accurate. Deviations from the observed market price  
7 are typically congestion costs that are not captured due to unexpected generation or  
8 transmission outages, or power flows from neighboring regions (e.g., MISO or  
9 AECI).

10 **II. FUEL, PURCHASE POWER AND OFF-SYSTEM SALES**  
11 **NORMALIZATION**

12 **Q: What method for normalizing the test year fuel cost, purchase power cost and**  
13 **off-system sales did you use in this case?**

14 A: System peak load and energy, prices paid for fuel, generating system maintenance  
15 schedules, and generating resource availability were normalized and annualized to  
16 normalize the test year fuel cost, purchase power cost and off-system sales revenue.  
17 PROMOD was then used to simultaneously solve for power prices, the appropriate  
18 generation and purchase power levels, and the resulting fuel cost, purchase power  
19 cost and off-system sales revenue.

20 **Q: Please describe the normalization of the system requirements for this rate case.**

21 A: Evergy Missouri West's native load was adjusted to reflect weather normalized and  
22 annualized customer growth by the Company's load forecasting personnel. This  
23 process is described in detail in the Direct Testimony of Company witness Albert  
24 R. Bass. These normalized monthly peak demands and energy requirements were

1 used as inputs into the PROMOD model. The software distributes these monthly  
2 energy requirements on an hourly basis, then utilizes the normalized hourly system  
3 loads to shape the normalized loads. The resulting load shape was then used in the  
4 normalized production cost modeling.

5 The Company's wholesale contract customers that contained an energy  
6 component were added to the native load to arrive at the total system requirement.

7 **Q: Please describe these wholesale contract customers.**

8 A: These are energy sales to Western Area Power Administration ("WAPA"). The  
9 revenue for this transaction and the associated fuel expense is included in Schedule  
10 HYF-4 (**Confidential**).

11 **Q: Please describe the fuel price normalization.**

12 A: The normalized fuel prices used in the modeling are described in the Direct  
13 Testimony of Company witness Jessica Tucker. These fuel prices were input into  
14 the model on a plant-specific basis and were then used in the normalized PROMOD  
15 run.

16 **Q: Please describe the maintenance outages normalization.**

17 A: Evergy Missouri West performs scheduled maintenance on our base load  
18 generating units on a cyclical basis over a set number of years, i.e., a specific unit  
19 in any given year may have an extended turbine generator outage, an extended  
20 boiler outage, a shorter boiler outage, a short inspection outage, or no outage at all.  
21 Consequently, in any specific year there may be higher or lower scheduled  
22 maintenance outages than the long-term average maintenance outages. To  
23 normalize the availability of the generating resources, the total number of weeks

1 that a unit would be scheduled for maintenance over the cycle was averaged over  
2 the number of years in the maintenance cycle. These normalized maintenance  
3 outage assumptions were then spread over a 12-month period to develop a  
4 normalized maintenance schedule. These outages were scheduled such that all base  
5 load generating resources would be available during the peak load periods of June  
6 through mid-September, and December through February. Schedule HYF-2  
7 **(Confidential)** contains the maintenance schedule that was used for the  
8 normalization.

9 In the model run used for this Direct filing, the maintenance outage for Unit  
10 1 at Iatan station, and Unit 3 at Jeffrey Energy Center station inadvertently overlap  
11 for 23 days in March; this will be corrected at True-Up such that coal unit  
12 maintenance schedules do not overlap.

13 **Q: Please describe the generating resources availability normalization.**

14 A: As part of Evergy Missouri West's operating plan, the Company's coal generating  
15 units, except Iatan 2, are expected to be on seasonal layup during the Spring months  
16 of March, April and May, and the Fall months of October and November. The  
17 Company will offer at least one coal unit at each station as normal to the market,  
18 and offer the remaining coal units with extended startup times. This is enabled by  
19 high wind production, low natural gas prices, and low demand during the Spring  
20 and Fall months. Seasonal layup will allow the Company to reduce wear and tear  
21 on the generating units and ultimately lower costs. The plan for seasonal layup is  
22 scheduled in tandem with the normalized maintenance outage schedule such that  
23 all the Company's coal stations will always have at least one unit available to the

1 market. Schedule HYF-3 (**Confidential**) contains the seasonal layup schedule that  
2 was used for the normalization.

3 **Q: Please describe the generating resources available capacity normalization.**

4 A: The generating resources available in the rate case modeling are the same as Evergy  
5 Missouri West's resources with capacity levels that are expected to be in place and  
6 operational as of the true-up date in this case. The normalized capacity levels  
7 account for amounts that have historically been needed by the ancillary services  
8 market. They also include qualitative adjustments made to compensate for model  
9 biases and limitations, and to improve trends of the Company's coal fleet resources'  
10 historical annual generation output.

11 **Q: Has there been additions to Evergy Missouri West's portfolio of generating  
12 resources? Please describe.**

13 A: Since the last rate case filing, Case No. ER-2022-0130, Evergy Missouri West has  
14 signed an asset purchase agreement for a 22.2% ownership share of the Dogwood  
15 Energy facility, a combined cycle natural gas generating unit located in Cass  
16 County, Missouri, with a capacity of 675MW. The transaction is expected to close  
17 by June 30, 2024, and has been included in the Company's portfolio of generating  
18 resources.

19 **Q: How was the generation from renewable resources modeled in this case?**

20 A: Wind generation that has been included in the model are Power Purchase  
21 Agreements ("PPA") from resources that are operating and under contract. These  
22 are the Cimarron Bend 3, Gray County, Ensign, Osborn, Prairie Queen, Pratt and

1 Rock Creek wind farms. The generation levels and energy prices are based upon  
2 signed contracts and actual 12-month ending August 2023 historical generation.  
3 Generation from the St. Joseph Landfill Gas facility has also been included, based  
4 on its operating history. Generation from the Greenwood Solar and Hawthorn Solar  
5 facilities have also been included and is based on projected normal generation  
6 levels. These resources are Company owned or partially owned facilities.

7 **Q: For the test period, what revenue and expense items, if any, were adjusted as**  
8 **a result of normalizing fuel cost, purchased power costs and off-system sales?**

9 A: Adjustments were made to fuel costs to reflect both a normalized fuel market and  
10 normalized generation levels. Purchased power expense and bulk power sales were  
11 also adjusted to reflect the changes in the quantity of energy purchased, or sold, and  
12 the prices of such purchases or sales. Schedule HYF-4 (**Confidential**) shows the  
13 generation levels by resource type, purchased power levels, the costs of each, and  
14 the revenues from generation sales and wholesale contract customers.

15 **III. ADJUSTMENTS TO THE NORMALIZED FUEL, PURCHASE POWER**  
16 **AND WHOLESALE SALES RESULTS**

17 **Q: Does Evergy Missouri West propose any adjustments to the PROMOD® IV**  
18 **model results?**

19 A: Yes. Adjustments should be made for  
20       ▪ the Renewable Energy Rider (“RER”) program,  
21       ▪ impacts relating to Nucor Steel Sedalia, LLC (“NUCOR”), a non-  
22       residential customer of Evergy Missouri West,  
23       ▪ SPP Purchase Power Administrative Fees,  
24       ▪ SPP purchases and sales for ancillary services,

- 1           ▪       SPP Revenue Neutrality Uplift (“RNU”) charges,
- 2           ▪       line loss payments related to the Missouri Iowa Nebraska
- 3                   Transmission (“MINT”) line, and
- 4           ▪       Transmission Congestion Right (“TCR”) margins.

5   **Q:    What is the RER program?**

6   A:    The RER program allows non-residential Evergy Missouri West customers to  
7       purchase renewable energy from renewable resources that the Company contracts.

8   **Q:    Why is it appropriate that adjustments be made for the RER program?**

9   A:    Revenues and costs associated with this program should not be included as part of  
10       the FAC but are included in the model used by the Company to calculate fuel and  
11       purchase power costs. As such, the revenues and costs associated with the RER  
12       program should be removed as an adjustment to Evergy Missouri West’s FAC base  
13       rate calculation.

14   **Q:    What amount of the RER adjustments has Evergy Missouri West included in  
15       this case?**

16   A:    The amount of RER adjustments is based on the adjusted and annualized values  
17       from the Company’s model results. These values will be updated to actual amounts  
18       for the most recent 12-months at True-Up.

19   **Q:    What are the adjustments relating to Nucor?**

20   A:    The Stipulation and Agreement from Case No. EO-2019-0244 requires Evergy  
21       Missouri West to identify and isolate costs to provide service to Nucor, and to  
22       remove them from the FAC. These include PPA costs identifiable to Nucor and  
23       the net effect of the sale of PPA purchases for Nucor and the Nucor load.

1 **Q: Why is it appropriate that adjustments be made for Nucor?**

2 A: Nucor related costs and revenues are included in the model used by the Company  
3 to calculate fuel and purchase power costs. As such, the revenues and costs  
4 associated with Nucor should be excluded from the FAC base rate calculation.

5 **Q: What amount of adjustments relating to Nucor has Evergy Missouri West**  
6 **included in this case?**

7 A: The amount of Nucor related adjustments is based on the adjusted and annualized  
8 values from the Company's model results. These values will be updated to actual  
9 amounts for the most recent 12-months at True-Up.

10 **Q: What are SPP Purchase Power Administrative Fees?**

11 A: As a participant in the SPP IM, SPP charges Evergy Missouri West administrative  
12 fees related to costs of running and operating the SPP market. These charges  
13 include fees to recover the costs of operating the Day-Ahead and Real-Time  
14 Balancing markets, market settlements, credit services, market monitoring and  
15 Transmission Congestion Rights ("TCR") operations.

16 **Q: Why is it appropriate that adjustments be made for SPP Purchase Power**  
17 **Administrative Fees?**

18 A: These charges are not included in the model used by the Company to calculate fuel  
19 and purchase power costs. As such, the SPP Purchase Power Administrative Fees  
20 should be included as an adjustment to Evergy Missouri West's model results.  
21 Absent this adjustment, these charges would not otherwise be reflected in the  
22 Company's retail cost of service.



1 **Q: What amount of SPP Purchase Power Administrative Fees has Evergy**  
2 **Missouri West included in this case?**

3 A: The amount of SPP Purchase Power Administrative Fees included in this case is  
4 the actual payments for the 12-months ending August 2023. This adjustment is  
5 shown in Schedule HYF-4 (**Confidential**). These values will be updated to the  
6 actual amounts for the most recent 12-months at True-Up.

7 **Q: What are ancillary services purchases and sales?**

8 A: As a participant in the SPP IM, Evergy Missouri West is obligated to provide or  
9 procure certain ancillary services. These services include spinning, supplemental  
10 and regulating reserves. Evergy Missouri West purchases its SPP-specified  
11 ancillary services from the SPP-operated ancillary services market. In addition,  
12 Evergy Missouri West can sell these ancillary services in the SPP-operated market.

13 **Q: Why is it appropriate that Evergy Missouri West include adjustments for**  
14 **ancillary services?**

15 A: These charges and revenues are not included in the model used by the Company to  
16 calculate fuel and purchase power costs. Absent this adjustment, these amounts  
17 would not otherwise be reflected in the Company's retail cost of service.

18 **Q: What net amount of ancillary services purchases and sales has Evergy**  
19 **Missouri West included in this case?**

20 A: The net amount of ancillary services purchase and sales included in this case is  
21 based on the average annual actual costs and revenues incurred by Evergy Missouri  
22 West for the 3-years ending July 2023. This adjustment is shown in Schedule HYF-

1 4 (**Confidential**). These values will be updated to actual amounts for the most  
2 recent 12-months at True-Up.

3 **Q: What are SPP RNU charges?**

4 A: As a participant in the SPP IM, several miscellaneous charges and credits are  
5 incurred for SPP to remain revenue neutral. The charges and credits that make up  
6 the RNU charges include items such as rounding errors and inadvertent interchange  
7 costs or revenue. RNU is distributed among the market participants as either a debit  
8 (if SPP is short of funds to balance payments between participants) or a credit (if  
9 SPP has collected more than needed to balance payments between participants).

10 **Q: Why is it appropriate that Evergy Missouri West include SPP RNU charges in  
11 its calculation of revenue requirements?**

12 A: As a participant in the SPP IM, Evergy Missouri West is exposed to RNU charges  
13 and credits. These charges and credits are not included in the model used by the  
14 Company to calculate fuel and purchase power costs. As such, the net SPP RNU  
15 charges have been included as an adjustment to Evergy Missouri West's model  
16 results. Absent this adjustment, RNU-related charges and credits would not  
17 otherwise be reflected in the Company's retail cost of service.

18 **Q: What net SPP RNU amount has Evergy Missouri West included in this case?**

19 A: The RNU charges included in this case are based on the average annual net amounts  
20 for the 3-years ending July 2023. This adjustment is shown in Schedule HYF-4  
21 (**Confidential**). These values will be updated to actual amounts for the most recent  
22 12-months at True-Up.

1 **Q: What are the MINT line loss payments?**

2 A: These are payments made to AECI for transmission losses on the MINT line. AECI  
3 provides coverage of the losses in-kind, and the Company reimburses AECI for its  
4 share.

5 **Q: What amount of MINT line loss payments has Evergy Missouri West included**  
6 **in this case?**

7 A: The line loss payments included are based on the actual payments for the 12-months  
8 ending July 2023. This adjustment is shown in Schedule HYF-4 (**Confidential**).  
9 These values will be updated to actual amounts for the most recent 12-months at  
10 True-Up.

11 **Q: What are TCRs?**

12 A: Under the SPP IM, there are congestion charges for moving energy from generation  
13 to load when the transmission system is congested. As the SPP IM was developed,  
14 financial instruments were created to hedge these transmission congestion charges.  
15 These hedges are called TCRs.

16 **Q: Why is it appropriate that Evergy Missouri West include TCR margins in its**  
17 **calculation of revenue requirements?**

18 A: In theory, transmission customers such as Evergy Missouri West are allocated  
19 TCRs in sufficient quantity to hedge the actual transmission congestion charges  
20 incurred to serve their native load obligations. However, during the period 12-  
21 months ending July 2023, the revenue received from the Company's TCR portfolio  
22 exceeded the estimated congestion costs. The estimated annualized net gain on

1 Evergy Missouri West's TCR portfolio has been included as a credit to the retail  
2 cost of service.

3 **Q: What amount has Evergy Missouri West included for TCR margins in this**  
4 **case?**

5 A: The TCR margins included are based on the actual payments for the 12-months  
6 ending July 2023. This amount can be found in Schedule HYF-4 (**Confidential**).  
7 This amount will be updated to the actual amount for the most recent 12-months at  
8 True-Up.

9 **IV. ELECTRIC UTILITY FUEL AND PURCHASE POWER COST**  
10 **RECOVERY MECHANISM**

11 **Q: Regarding Evergy Missouri West's request for continued use of an FAC which**  
12 **portions of the Electric Utility Fuel and Purchased Power Cost Recovery**  
13 **Mechanism filing requirements are you addressing in your testimony?**

14 A: I will address all or portions of the FAC Rule 20 CSR 4240-20.090(2)(A) 15, 16,  
15 and 17. Requirement 15 addresses heat rate test results, requirement 16 addresses  
16 the long-term planning process, and requirement 17 addresses forecasted  
17 environmental investments.

18 **Q: Has Evergy Missouri West supplied the heat rate test results and**  
19 **documentation of the actual test/monitoring procedures for its generating**  
20 **units required per 20 CSR 4240-20.090(2)(A) 15?**

21 A: Yes. Heat rate test results conducted within the previous 24 months are provided in  
22 Schedule HYF-5 (**Confidential**). The documentation of the actual test/monitoring  
23 procedures is provided in Schedule HYF-6 (**Confidential**).

1 **Q: Please provide your support for 20 CSR 4240-20.090(2)(A) 16.**

2 A: Requirement 16 requires the Company to provide:

3 “Information that shows that the electric utility has in place a long-  
4 term resource planning process; ....”

5 Evergy Missouri West has a long-term resource planning process in place. The  
6 electric utility resource plan produced by the process is also known as an integrated  
7 resource plan (“IRP”). An objective of this planning process is to identify the least  
8 cost and preferred resource plans while maintaining adequate capacity reserves for  
9 reliability.

10 **Q: When was Evergy Missouri West’s last IRP prepared?**

11 A: Evergy Missouri West prepared and filed its latest IRP updated report in June 2023  
12 in Case No. EO-2023-0213.

13 **Q: When will the next Evergy Missouri West IRP be prepared?**

14 A: Under the current IRP rule, the next IRP is to be filed in March 2024. This will be  
15 a tri-annual filing.

16 **Q: Please provide your support for 20 CSR 4240-20.090(2)(A) 17.**

17 A: Requirement 17 states:

18 “If the electric utility proposes to include emission allowances costs  
19 or sales revenue in the proposed FAC and not in an environmental  
20 cost recovery mechanism, a detailed explanation of its emissions  
21 management policy, and its forecasted environmental investments,  
22 emissions allowances purchases, and emissions allowances sales;  
23 ...”

24 At this time, Evergy Missouri West has no forecasted environmental investments  
25 that would impact emission allowance costs or sales revenues.

1 The explanation of the Company's emissions management policy and its forecasted  
2 emissions allowances purchases and sales required by 20 CSR 4240-20.090(2)(A)  
3 17 can be found in the Direct Testimony of Company witness Jessica Tucker.

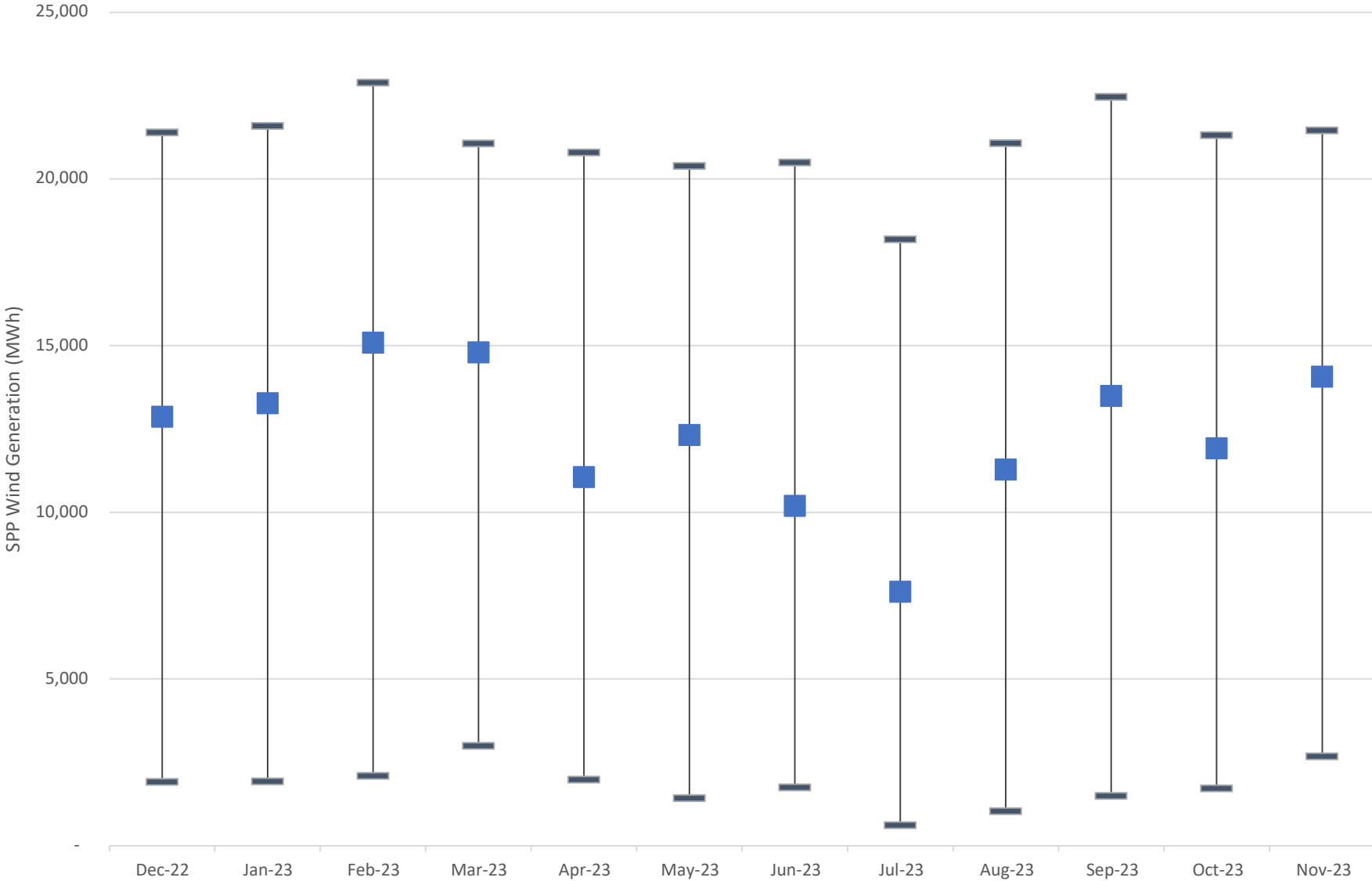
4 **Q: Does that conclude your testimony?**

5 A: Yes, it does.



# Volatility of Wind Generation in SPP Region

*Minimum, Average and Maximum*





**SCHEDULES HYF-2 THROUGH HYF-6  
CONTAIN CONFIDENTIAL  
INFORMATION  
NOT AVAILABLE TO THE PUBLIC.  
  
ORIGINALS FILED UNDER SEAL.**

**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: February 2, 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
Schedule HYF-2	3,4, and 6
Schedule HYF-3	3,4, and 6
Schedule HYF-4	3,4, and 6
Schedule HYF-5	3,4, and 6
Schedule HYF-6	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.