

Exhibit No. 262

Staff – Exhibit 262
Brodrick Niemeier
Surrebuttal/True-Up Direct
File No. ER-2024-0189

Exhibit No.:
Issue(s): Fuel and Purchased Power
Witness: Brodrick Niemeier
Sponsoring Party: MoPSC Staff
Type of Exhibit: True-Up Rebuttal Testimony
Case No.: ER-2024-0189
Date Testimony Prepared: September 18, 2024

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENGINEERING ANALYSIS DEPARTMENT

TRUE-UP REBUTTAL TESTIMONY

OF

BRODRICK NIEMEIER

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 **BRODRICK NIEMEIER**

4 **EVERGY MISSOURI WEST, INC.,**
5 **d/b/a Evergy Missouri West**

6 **CASE NO. ER-2024-0189**

7 Q. Please state your name and business address.

8 A. My name is Brodrick Niemeier. My business address is 200 Madison St,
9 Jefferson City, MO 65101.

10 Q. Are you the same Brodrick Niemeier that filed Direct and Rebuttal testimony
11 in this case?

12 A. Yes, I am.

13 Q. What is the purpose of your true-up rebuttal testimony?

14 A. My purpose is firstly to respond to the true-up direct testimony
15 Evergy Missouri West (“EMW”) witness Hsin Foo by discussing differences between the
16 historical generation of EMW’s South Harper and Crossroads plants and EMW’s production
17 cost model, and secondly to discuss an error in Staff’s fuel cost for Dogwood Energy Center.

18 **SOUTH HARPER AND CROSSROADS**

19 Q. What is the issue with Crossroad’s generation in EMW’s production cost model?

20 A. Simply put, Crossroads is substantially over-generating in EMW’s model.
21 Staff uses both 3-year and 7-year averages for generation. This is because the 3-year average
22 models current trends of site generation better while the 7-year average includes the major
23 planned outage that most units experience once every seven years. The average generation for

True-up Rebuttal Testimony of
Brodrick Niemeier

1 each Crossroads unit in the past seven years is only ** [REDACTED] **. According to EMW's
2 model, each unit is generating ** [REDACTED] **. When using a three-year average,
3 Crossroads units each generate ** [REDACTED] **, which is closer, but the model's average
4 is also skewed by Crossroads Unit 4, which only generated ** [REDACTED] ** while
5 Crossroads Unit 1 generated ** [REDACTED] **. According to the historical data, no
6 Crossroads unit has ever generated more than ** [REDACTED] ** in a year. This means that
7 EMW's fuel model exceeds the maximum historical generation of any unit at
8 Crossroads by 18%.

9 Q. Does Staff know why EMW's Crossroads generation exceeds its
10 historical generation?

11 A. No. Staff notes that Crossroads historically generated more in 2023 than any
12 other year on record, and unlike with South Harper, Crossroads' fuel prices were not lower in
13 the model than they have been historically, but it is unclear what factors are causing the
14 increased generation for Crossroads in the company's model.

15 Q. Could you go into detail about the issues with South Harper?

16 A. Yes. Just like Crossroads, South Harper generated well above what it has
17 historically. The 3-year average for all South Harper units together was ** [REDACTED] **,
18 and the 7-year average was ** [REDACTED] **. This is significantly lower than
19 the ** [REDACTED] ** average that EMW's model has for all South Harper units combined.
20 Even in the plant's highest generating year, only ** [REDACTED] ** were generated, meaning
21 the model exceeded South Harper's maximum historical generation by 62.8%.

22 Q. Can Staff explain why EMW's South Harper generation is so much higher than
23 it is historically?

1 A. No. Staff does suspect that it could partially be due to lowered fuel costs,
2 but this would not be the sole reason for the increased generation.

3 **DOGWOOD FUEL PRICES**

4 Q. What is the error with the Dogwood fuel prices?

5 A. The wrong set of fuel prices were used in Plexos for Dogwood. Staff has run a
6 simulation to determine the effect of the wrong prices, and has found that there is a 0.18%
7 increase¹ in the Fuel and Purchased Power Cost when the correct prices are used. Because this
8 is a relatively minor change, Staff plans to continue to endorse the previously proposed
9 Fuel and Purchased Power Cost of \$244,583,657.

10 Q. Does this conclude your True-up Rebuttal testimony?

11 A. Yes it does.

¹ This corresponds to an increase of \$446,046 to \$245,029,703.

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 Implement A General Rate)
Increase for Electric Service)

Case No. ER-2024-0189

AFFIDAVIT OF BRODRICK NIEMEIER

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW BRODRICK NIEMEIER 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 Brodrick Niemeier*; and that the same is true and correct according to his best knowledge and belief.

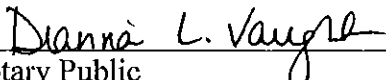
Further the Affiant sayeth not.


BRODRICK NIEMEIER

JURAT

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 17th day of September 2024.

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


Notary Public