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Service Commission

Exhibit No. 274

Staff – Exhibit 274 Brodrick Niemeier True-Up Rebuttal 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 5		EVERGY MISSOURI WEST, INC., 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		

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each Crossroads unit in the past seven years is only ** **. According to EMW's **. When using a three-year average, model, each unit is generating ** **, which is closer, but the model's average Crossroads units each generate ** is also skewed by Crossroads Unit 4, which only generated ** Crossroads Unit 1 generated ** **. According to the historical data, no ** in a year. This means that Crossroads unit has ever generated more than ** EMW's fuel model exceeds the maximum historical generation of any unit at Crossroads by 18%. Q. Does Staff know why EMW's Crossroads generation exceeds its historical generation? A. No. Staff notes that Crossroads historically generated more in 2023 than any other year on record, and unlike with South Harper, Crossroads' fuel prices were not lower in the model than they have been historically, but it is unclear what factors are causing the increased generation for Crossroads in the company's model. Q. Could you go into detail about the issues with South Harper? Yes. Just like Crossroads, South Harper generated well above what it has A. historically. The 3-year average for all South Harper units together was ** and the 7-year average was ** This is significantly lower than ** average that EMW's model has for all South Harper units combined. the ** Even in the plant's highest generating year, only ** ** were generated, meaning the model exceeded South Harper's maximum historical generation by 62.8%. Q. Can Staff explain why EMW's South Harper generation is so much higher than it is historically?

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

DOGWOOD FUEL PRICES

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- 4 Q. What is the error with the Dogwood fuel prices?
 - A. The wrong set of fuel prices were used in Plexos for Dogwood. Staff has run a simulation to determine the effect of the wrong prices, and has found that there is a 0.18% increase¹ in the Fuel and Purchased Power Cost when the correct prices are used. Because this is a relatively minor change, Staff plans to continue to endorse the previously proposed Fuel and Purchased Power Cost of \$244,583,657.
 - 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. Bare	ODRICK NIEMEIER			
JUI	RAT			
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 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	Diannà L. Vaugle ary Public			