

Exhibit No. 274

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

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.

