

FILED  
November 1, 2024  
Data Center  
Missouri Public  
Service Commission

# Exhibit No. 239

Staff – Exhibit 239  
Brodrick Neimeier  
Rebuttal  
File No. ER-2024-0189

*Exhibit No.:*  
*Issue(s):* Variable Fuel  
*Witness:* Brodrick Niemeier  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Rebuttal Testimony  
*Case No.:* ER-2024-0189  
*Date Testimony Prepared:* August 6, 2024

**MISSOURI PUBLIC SERVICE COMMISSION**  
**INDUSTRY ANALYSIS DIVISION**  
**ENGINEERING ANALYSIS DEPARTMENT**

**REBUTTAL TESTIMONY**  
**OF**  
**BRODRICK NIEMEIER**

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

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

*Jefferson City, Missouri*  
*August 6, 2024*

1 **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 and my business address is Public Service  
9 Commission, P.O. Box 360, Jefferson City, MO 65102.

10 Q. By whom are you employed and in what capacity?

11 A. I am employed by the Missouri Public Service Commission (“Commission”) as  
12 an Associate Engineer in the Engineering Analysis Department of the Industry Analysis

13 Q. Are you the same Brodrick Niemeier that previously filed direct testimony in  
14 this case?

15 A. Yes.

16 **EXECUTIVE SUMMARY**

17 Q. What is the purpose of your rebuttal testimony?

18 A. The purpose of my rebuttal testimony is to present the results of Staff’s updated  
19 production cost model run and recommend an updated variable fuel and purchased power  
20 expense of \$278,496,721.

21 **VARIABLE FUEL AND PURCHASED POWER EXPENSE**

22 Q. What changes have you made to update the production cost model run?

Rebuttal Testimony of  
Brodrick Niemeier

1           A.     The first and most major change were the correction of the location marginal  
2 prices (“LMP”) used in the production cost model for Cimarron Bend Wind Farm. There were  
3 also two corrections made to the load data.

4           Q.     Can you go into more detail about the effects of the Cimarron Bend change?

5           A.     Yes. The incorrect LMP generated more profit for Evergy Missouri West  
6 (“EMW”) in the simulation, which decreased the variable Fuel and Purchased Power Cost by  
7 approximately \$27 million.

8           Q.     Can you explain the changes you made to the load data?

9           A.     Yes. There are two changes that were made to load data. The first was due to  
10 formula errors in a workpaper that adjusted load to account for border customers and Western  
11 Area Power Administration sales. The error in the original spreadsheet formula resulted in  
12 incorrect adjustments being made. The other change made was in the hourly Load Node LMP  
13 data. The Load Node LMP data used in Staff’s results spreadsheet was inconsistent in 92  
14 of 8,760 hours with the Load Node LMP data used in the model. Together these two changes  
15 affected the variable fuel and purchased power expense by less than \$500,000.

16          Q.     Have you made any other changes or adjustments to the production cost model  
17 or supporting workpapers.

18          A.     No.

19          Q.     What was the impact of these changes?

20          A.     Before these changes, Staff’s variable fuel and purchased power expense  
21 was \$250,773,215; and after the above changes Staff’s variable fuel and purchased power  
22 expense is \$278,496,721. These corrections result in an approximately \$27.2 million increase  
23 in Staff’s variable fuel and purchase power expense.

24          Q.     Does this conclude your rebuttal testimony?

25          A.     Yes, it does.

