

FILED  
November 1, 2024  
Data Center  
Missouri Public  
Service Commission

# Exhibit No. 252

Staff – Exhibit 252  
Teresa L. Denney True-Up  
Direct  
File No. ER-2024-0189

*Exhibit No.:*  
*Issue(s):* *Fuel Adjustment Clause*  
*Witness:* *Teresa L. Denney*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *True-Up*  
*Direct Testimony*  
*Case Nos.:* *ER-2024-0189*  
*Date Testimony Prepared:* *September 10, 2024*

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**ENERGY RESOURCES DEPARTMENT**

**TRUE-UP DIRECT TESTIMONY**

**OF**

**TERESA L. DENNEY**

**EVERGY MISSOURI WEST, INC.,**

**d/b/a Evergy Missouri West**

**Case No. ER-2024-0189**

*Jefferson City, Missouri*  
*September 2024*

1 **TABLE OF CONTENTS OF**  
2 **TRUE-UP DIRECT TESTIMONY OF**  
3 **TERESA L. DENNEY**  
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 Teresa L. Denney, and my business address is 200 Madison Street,  
9 Jefferson City, Missouri 65102.

10 Q. Are you the same Teresa Denney who previously provided direct and rebuttal  
11 testimony in this case?

12 A. Yes.

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

14 A. The purpose of my true-up direct testimony is to provide an update to the FAC  
15 base factor.

16 **TRUE-UP DIRECT**

17 Q. What is Staff recommending for EMW's True-Up Direct Base Factor?

18 A. Staff calculated the true-up base factor ("BF") rate in this case based upon the  
19 following information: (1) net base energy costs (fuel and purchased power costs less  
20 off-system sales ("OSS") revenue) including Staff's accounting adjustments to the true-up  
21 period; and (2) normalized net system inputs ("NSI");

**EMW Base Factor**

Net Fuel and Purchased Power	\$ 249,899,494
NSI	<u>8,946,193,811</u>
BF	\$0.02793 per kWh

Q. Why is Staff updating its recommended base factors?

A. Staff is updating its recommended base factors to reflect the changes Staff witnesses Jared Giacone and Brodrick Niemeier support in their true-up direct testimonies and associated fuel run and accounting schedules. The recommended base factors reflect the updated normalization true-up period, ending June 30, 2024. This also revised the calculated pass-through percentage of Southwest Power Pool (“SPP”) transmission costs in the FAC of 72.76%. Additionally, Staff is updating the Transmission Congestion Rights (“TCR”) and Auction Revenue Rights (“ARR”) net revenue amounts made by Staff witness Karen Lyons in her true up direct accounting schedule.

Q. Does this conclude your true-up direct testimony?

A. Yes, it does.

**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 TERESA DENNEY**

STATE OF MISSOURI     )  
  )  
COUNTY OF COLE     )     ss.

**COMES NOW TERESA DENNEY** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Surrebuttal / True-Up Direct Testimony of Teresa Denney*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

  
TERESA DENNEY

**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 3<sup>rd</sup> day of September 2024.

D. SUZIE MANKIN  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: April 04, 2025  
Commission Number: 12412070

  
Notary Public