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# Exhibit No. 264

Staff – Exhibit 264  
Hari Poudel, PhD  
Surrebuttal & True-Up Direct  
File No. ER-2024-0189

*Exhibit No.:*  
*Issue(s):* MEEIA, EDR  
*Witness:* Hari K Poudel, PhD  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Surrebuttal/True-Up  
Direct Testimony  
*Case No.:* ER-2024-0189  
*Date Testimony Prepared:* September 10, 2024

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**TARIFF/RATE DESIGN DEPARTMENT**

**SURREBUTTAL / TRUE-UP DIRECT TESTIMONY**

**OF**

**HARI K. POUDEL, PhD**

**EVERGY MISSOURI WEST, INC.,**

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

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

*Jefferson City, Missouri*  
*September 10, 2024*

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**EVERGY MISSOURI WEST, INC.,**  
**d/b/a Evergy Missouri West**  
**CASE NO. ER-2024-0189**

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1           A.     Yes. I provide the annualized energy savings by rate class by month for the Staff  
2 true-up period to Staff witnesses Kim Cox and Marina Stever to determine appropriate revenue  
3 adjustments to include in the overall revenue requirement.

4     **MEEIA ANNUALIZATION ADJUSTMENT**

5           Q.     What adjustments did you calculate with respect to the EMW MEEIA portfolio  
6 for the true-up period?

7           A.     I calculated annualized energy savings for EMW based upon reported savings  
8 provided by EMW<sup>1</sup> from energy efficiency measures that were installed during the true-up  
9 period. Staff annualized the level of energy efficiency savings that occurred at the end of the  
10 true-up period as if they had occurred throughout the year, which is consistent with the Staff  
11 approach in EMW's last general rate case, Case No. ER-2022-0130. Staff utilized the data  
12 provided by EMW in this analysis. I provided the annualized energy savings by rate class by  
13 month for the Staff update period to Staff witnesses Kim Cox and Marina Stever to determine  
14 appropriate revenue adjustments to include in the overall revenue requirement.

15          Q.     Did Staff perform a MEEIA annualization adjustment for the Large Power  
16 Service ("LPS") rate class for the true-up period?

17          A.     Yes. Unlike in direct testimony, Staff did not run the MEEIA annualization  
18 adjustment for the LPS rate class by individual customer based upon the timing of available  
19 information.<sup>2</sup> Staff witness Marina Stever uses the entire LPS class as a lump sum. Ms.  
20 Stever's true-up direct testimony includes a detailed approach on LPS adjustment.

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<sup>1</sup> Responses to DRs 263 and 263.1 ER-2024-0189.

<sup>2</sup> Staff received individual customer MEEIA data on 5th September 2024, but was unable to incorporate into the billing determinant adjustments for the filing of true-up direct. Staff will review the information provided by Evergy and may modify the LPS revenue adjustment in the true-up rebuttal filing.

1 Q. Is there a distinct MEEIA adjustment method used by the Staff in this filing?

2 A. No. Staff used the same MEEIA adjustment method in this filing. Staff's method  
3 is based on the actual Kilowatt hour ("kWh") savings during the update period. However,  
4 EMW used the projected kWh savings until the true-up date.

5 Q. Does Staff's MEEIA adjustment method exclude any kWh savings projections  
6 for the up-date period?

7 A. No. The MEEIA adjustment approach used by Staff does not exclude any kWh  
8 savings projection that were included in the update period. However, EMW inappropriately  
9 used the projected kWh savings through the end of the true-up period for the direct filing.

10 **ECONOMIC DEVELOPMENT RIDER ("EDR") ADJUSTMENTS**

11 Q. Has Staff revised the EDR adjustment for the true-up period?

12 A. No.

13 Q. Is Staff lacking the necessary information to carry out EDR adjustment for the  
14 true-up period?

15 A. Yes. Staff issued Data Request ("DR") 0466 to get information regarding the  
16 EDR adjustment for the true-up period. However, EMW provided a "Semi-Annual Report for  
17 July 2024."<sup>3</sup> The semi-annual report contains cumulative kWh that cannot be used for the  
18 monthly calculation of the EDR adjustment. As a result, Staff was unable to carry out EDR  
19 adjustment for the true-up period.

20 **CONCLUSION**

21 Q. Does this conclude your Surrebuttal / True-up Direct testimony?

22 A. Yes it does.

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<sup>3</sup> DR 0466 ER-2024-0189.

