

FILED  
November 1, 2024  
Data Center  
Missouri Public  
Service Commission

# Exhibit No. 275

Staff – Exhibit 275  
Hari Poudel, PhD  
True-Up Rebuttal  
File No. ER-2024-0189

*Exhibit No.:*  
*Issue(s):* MEEIA  
*Witness:* Hari K Poudel, PhD  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Surrebuttal/True-Up  
Rebuttal Testimony  
*Case No.:* ER-2024-0189  
*Date Testimony Prepared:* September 18, 2024

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**TARIFF/RATE DESIGN DEPARTMENT**

**TRUE-UP / REBUTTAL 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 18, 2024*

1 **TRUE-UP REBUTTAL TESTIMONY**

2 **OF**

3 **HARI K. POUDEL, PhD**

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

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

7  
8 Q. Please state your name and business address.

9 A. My name is Hari K. Poudel, and my business address is P.O. Box 360,  
10 Jefferson City, Missouri, 65102.

11 Q. Are you the same Hari K. Poudel that provided direct, rebuttal, and  
12 surrebuttal/true-up direct testimonies in this case?

13 A. Yes.

14 **EXECUTIVE SUMMARY**

15 Q. What is the purpose of your true-up rebuttal testimony?

16 A. The purpose of this true-up rebuttal testimony is to respond to  
17 Evergy Missouri West (“EMW”) witness Al Bass’ true-up adjustment regarding the  
18 Missouri Energy Efficiency Investment Act (MEEIA) adjustment analysis in the true-up period.

19 **MEEIA ANNUALIZATION ADJUSTMENT**

20 Q. Are there any differences in the MEEIA adjustment between Staff and EMW for  
21 Residential, SGS, MGS, and LGS classes?

22 A. Yes. Staff noticed a difference in the kWh savings while computing the Realized  
23 kWh savings in Bass’s workpapers.<sup>1</sup> EMW included kWh savings from July to December 2022

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<sup>1</sup> File name: “kWh-kW Savings MO West MEEIA TY 07012022-06302023 draft3 06302024 update”  
ER-2024-0189

1 in their calculation of realized kWh savings for January 2023; Staff did not.  
2 For February 2023 kWh savings, Staff used the cumulative savings from the prior month rather  
3 than the savings acquired from July 2022. Mr. Bass did not adopt the same methodology of  
4 using the preceding time frame in this rate case. Instead, he used a greater number of preceding  
5 months than in the prior rate case. No rational explanation is provided in his testimonies.

6 Q. Do you agree with Bass's approach of computing realized kWh savings?

7 A. No. The realized kWh savings is the result of the monthly deemed kWh savings  
8 and the load shape of a particular measure. In determining realized kWh savings for each  
9 measure category and rate class, Staff utilized only the kWh savings from the preceding month.  
10 However, Bass utilized the cumulative kWh savings from the preceding months for each  
11 measure and rate class. Staff disagrees with his methodology of including the kWh savings  
12 from all prior months when computing the realized kWh savings. As part of the true-up filing  
13 in Evergy's most recent rate case,<sup>2</sup> Staff and Evergy both utilized an approach similar to Staff's  
14 adjustment method in this case. However, in this case Evergy witness Bass appears to alter the  
15 method for calculating the EMW MEEIA true-up adjustment.<sup>3</sup>

16 Q. Could you please describe Mr. Bass's alternative approach?

17 A. Mr. Bass used all the kWh savings from all prior months for each measure and  
18 rate class in this rate case.

19 Q. Did EMW provide testimony regarding the change in method from its last  
20 general rate case to this one?

21 A. No.

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<sup>2</sup> ER-2022-0130

<sup>3</sup>File name: "kWh-kW Savings MO West MEEIA TY 01012021-12312021 true-up to 05312022 update draft1"  
ER-2022-0130

1 Q. Do you believe that the time frame difference may contribute to the variations  
2 in the MEEIA adjustment between Staff and EMW?

3 A. Yes, although there may also be some additional differences in the application  
4 of the MEEIA adjustments for the LPS class based upon data availability.

5 Q. Did Staff perform any MEEIA annualization adjustments for the LPS rate class  
6 during the true-up period?

7 A. Yes. Staff ran the MEEIA annualization adjustment for the LPS rate class but at  
8 that time did not have true-up period information provided by EMW at the customer level.<sup>4</sup>

9 **CONCLUSION**

10 Q. Does this conclude your true-up rebuttal testimony?

11 A. Yes, it does.

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<sup>4</sup> DR242 ER-2024-0189.

**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     )     Case No. ER-2024-0189  
Authority to Implement A General Rate     )  
Increase for Electric Service     )

**AFFIDAVIT OF HARI K. POUDEL, PhD**

STATE OF MISSOURI     )  
   )     ss.  
COUNTY OF COLE     )

COMES NOW HARI K. POUDEL, PhD 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 Hari K. Poudel, PhD*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

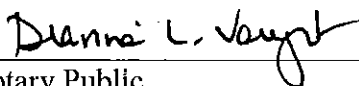


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HARI K. POUDEL, PhD

**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 16<sup>th</sup> 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

  
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Notary Public