# 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 Tariffs Changing	) File No. HT-2024-0296
the Steam QCA for Service Provided to	) Tariff No. JH-2025-0108
Customers in Service Territory	)

## STAFF RECOMMENDATION TO APPROVE TARIFF

**COMES NOW** the Public Service Commission Staff ("Staff"), by and through counsel, and recommends that the Commission approve the tariff filed by Evergy Missouri West Inc., d/b/a Evergy Missouri West.

- On January 15, 2025, Evergy Missouri West filed its Tariff Revision,
   Tracking No. JH-2025-0108. On January 30, 2025, Evergy Missouri West filed a substitute tariff sheet to correct an error.
- 2. On January 15, 2025, the Commission issued its *Order Directing Filing*. The *Order* directed Staff to file a recommendation regarding Evergy Missouri West's tariff sheet no later than February 7, 2025.
- 3. As more fully explained in the attached Memorandum, Staff has reviewed the proposed substitute tariff sheet and recommends its approval.

**WHEREFORE**, Staff respectfully submits this *Staff Recommendation to Approve Tariff*, and respectfully requests the Commission approve the substitute tariff filed by Evergy Missouri West.

Respectfully submitted,

## /s/ Casi Aslin

Casi Aslin
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#### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and or counsel of record on this 7<sup>th</sup> day of February, 2025.

/s/ Casi Aslin

#### **MEMORANDUM**

**TO:** Missouri Public Service Commission Official Case File

File No. HT-2024-0296 and Tariff Tracking No. JH-2025-0108

FROM: Melissa J. Reynolds, Senior Research/Data Analyst

Water, Sewer, Gas, & Steam Department

/s/ Melissa J. Reynolds 2/7/2025

Water, Sewer, Gas, & Steam Dept. / Date

SUBJECT: Staff Recommendation to approve the Quarterly Cost Adjustment for the

Fourth Quarter of 2024 to the Quarterly Cost Adjustment Rider – Steam of

Evergy Missouri West, Inc., d/b/a Evergy Missouri West

**DATE:** February 7, 2025

On January 15, 2025, Evergy Missouri West, Inc., d/b/a Evergy Missouri West ("EMW") filed with the Missouri Public Service Commission ("Commission") the following tariff sheet, bearing an effective date of March 1, 2025:

#### P.S.C. MO. No. 1

63<sup>rd</sup> Revised Sheet No. 6.10, Canceling 62<sup>nd</sup> Revised Sheet No. 6.10

This tariff filing revises EMW's Quarterly Cost Adjustment Rate ("QCA Rate") for the fourth quarter of 2024. Each quarter, EMW files rate adjustments to reflect the actual fuel costs above or below a base amount of \$2.4854 per Million British Thermal Units ("MMBtu"), which was determined in EMW's last rate case, Case No. HR-2018-0231.

The procedure for the calculation of the QCA Rate for steam service sales is set out in EMW's Tariff Sheet Nos. 6.6 through 6.10, titled "Quarterly Cost Adjustment Rider – Steam." The Current Quarterly Cost Adjustment is the rate adjustment component designed to reflect the customer share of the variation in fuel costs for the most recent quarter. The Commission approved EMW's Quarterly Cost Adjustment Rider in Case No. HR-2005-0450, and modified it in Case Nos. HR-2009-0092, HR-2010-0028, and HR-2018-0231. EMW's filing includes the proposed tariff sheet and supporting work papers, consisting of electronic worksheets showing EMW's calculation of the QCA Rate for the fourth quarter of 2024.

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<sup>&</sup>lt;sup>1</sup> Evergy Missouri West Tariff, Revised Sheet No. 6.6.

On January 15, 2025, the Commission issued an *Order Directing Filing* ordering Staff to file its recommendation no later than February 7, 2025.

On January 30, 2025, EMW submitted a substitute 63<sup>rd</sup> Revised Sheet No. 6.10 after an incorrect period "2025 Q4" was brought to EMW's attention by Staff. EMW corrected the error to "2024 Q4" to reflect the correct QCA Rate quarter.

The table below shows the calculation of the proposed Monthly QCA Rate ("Monthly QCA Rate") for the fourth quarter of 2024, effective for the billing period of March 1, 2025, through May 31, 2025, as well as the change per thousand MMBtu in cumulative rates from quarter to quarter:

Line No.	Qtr/Year	First Effective Date	Months	Last Effective Date	Q	CA Rate	Qtr/Year of R Factor Calculation		onciliation e (R Factor)	 mulative Rate	Change Per 1,000 MMBtu
(1)	Q1 2024	6/1/2024	12	5/31/2025	S	0.4090	Q4 2022	\$	0.0129	\$ 0.4860	\$324.50
(2)	Q2 2024	9/1/2024	12	8/31/2025	\$	(0.2117)	Q1 2023	\$	0.0010	\$ 0.2651	(\$220.90)
(3)	Q3 2024	12/1/2024	12	11/30/2025	\$	(0.1297)	Q2 2023	\$	(0.0000)	\$ 0.1089	(\$156.24)
(4)	Q4 2024	3/1/2025	12	2/28/2026	\$	0.0049	Q3 2023	\$	0.0001	\$ 0.0865	(\$22.40)
					\$	0.0725		\$	0.0140		
					1	Monthly QCA <sup>1</sup>					
(5)	Q4 2024	3/1/2025	3	5/31/2025	\$	0.0865					
1 The Month	The Monthly QCA rate is a summation of the total QCA Rates and the R Factors for the previous 4 quarters.										

This tariff filing reflects a proposed Monthly QCA Rate per MMBtu of \$0.0865 compared to the current Monthly QCA Rate of \$0.1089 per MMBtu.

#### **EMW QCA Rates and Reports**

Due to delays in billing and accounting processes, preliminary quarterly reports provided at the time of QCA Rate may not be complete and reflective of actual fuel costs. To resolve this, the billing report provided to the Department of Energy by EMW is utilized for actual fuel costs for the QCA Rate if the quarterly report is incomplete.

Also included on EMW quarterly reports is an Auxiliary Electric Power Allocation the Commission approved in Case No. ER-2022-0130.<sup>2</sup> This allocated credit is not utilized in the calculation of EMW's QCA Rate as an actual fuel cost.

<sup>&</sup>lt;sup>2</sup> Evergy Missouri West Electric Steam Allocations Manual, pages 5 and 11

#### Comparison to the Monthly QCA Rate for the Same Quarter of the Previous Year

The proposed Monthly QCA Rate for the fourth quarter 2024 reflects a decrease of \$37,204 in adjusted fuel costs, when compared to the same fuel costs for the Monthly QCA Rate for the fourth quarter 2023. The company states the decrease in the QCA rate is driven by lower natural gas prices.<sup>3</sup> The Reconciliation Rate component or "R Factor" reflects a decrease of \$34,143 when compared to the same quarter last year.<sup>4</sup>

Staff reviewed the data and calculations EMW provided in its worksheets and determined that EMW's calculations related to the filed tariff sheet are correct, and that the calculations satisfy the standards set forth in EMW's Tariff Sheet Nos. 6.6 through 6.10. The calculations are also consistent with previous EMW QCA Rate filings.

#### **Customer Billing Comparison**

The following table compares, per thousand MMBtu, the proposed cost for customers receiving steam service for the period March 1, 2025, through May 31, 2025,<sup>5</sup> to the current period of December 1, 2024, through February 28, 2025<sup>6</sup>:

Billing Comparison from Q3 2024 to Q4 2024						
Q3 2024 Billing	Q4 2024 Billing	Difference				
(\$156.24)	(\$22.40)	\$133.84				

Adding the previous three QCA rates and R Factor rates, this proposed QCA Rate and R Factor rate results in an increase of a steam customer's bill of \$133.84 for every thousand MMBtu for the billing period March 1, 2025, through May 31, 2025, compared to the 2024 third quarter billing period.

#### **Staff Recommendation**

Staff recommends the Commission approve EMW's proposed filed substitute tariff sheet with the effective date of March 1, 2025:

<sup>&</sup>lt;sup>3</sup> Natural gas cost approximately \$2.88 per MMBtu in fourth quarter 2023, compared to approximately \$2.79 per MMBtu in fourth quarter 2024.

<sup>&</sup>lt;sup>4</sup> The R Factor in this filing is a comparison of the balance of the reconciliation amount per QCA period from the fourth quarter 2022 through third quarter 2023.

<sup>&</sup>lt;sup>5</sup> \$0.0865 per MMBtu.

<sup>&</sup>lt;sup>6</sup> \$0.1089 per MMBtu.

MO PSC FILE NO. HT-2024-0296 OFFICIAL CASE FILE MEMORANDUM February 7, 2025 Page 4 of 4

#### P.S.C. MO. No. 1

63<sup>rd</sup> Revised Sheet No. 6.10, Canceling 62<sup>nd</sup> Revised Sheet No. 6.10

Staff has verified that EMW filed its Annual Report and is current on its submission of its Surveillance Monitoring reports. Staff is not aware of any other matter pending before the Commission that affects this tariff filing. Staff's basis for Commission approval of the QCA Rate in this case is solely on the accuracy of EMW's calculations and R Factor adjustments outlined above and is not indicative of the prudence of the fuel costs included in EMW's QCA Rate filing.

# BEFORE THE PUBLIC SERVICE COMMISSION

#### OF THE STATE OF MISSOURI

In the Matter of Evergy M d/b/a Evergy Missouri We the Steam QCA for Service Customers in its Service	est Tariff ce Provid	s Changing	) )	File No. HT-2024-0296
A	FFIDAV	/IT OF MEI	LISSA J.	REYNOLDS
STATE OF MISSOURI	)	SS.		
and lawful age; that she c	contribute	ed to the fore	egoing St	or oath declares that she is of sound mind aff Recommendation, in Memorandum or best knowledge and belief.
Further the Affiant say	eth not.	ME	LJ ELISSA J	. REYNOLDS
		JUI	RAT	
Subscribed and sworn	before m	e, a duly con	stituted a	nd authorized Notary Public, in and for

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

of February 2025.

Notary Public

willankin

the County of Cole, State of Missouri, at my office in Jefferson City, on this \_\_\_\_\_\_\_\_