



MISSOURI PUBLIC SERVICE COMMISSION

STAFF

RECOMMENDATION

Schedules 1 through 5

**EVERGY MISSOURI WEST
EVERGY MISSOURI METRO**

CASE NO. EA-2025-0075

*Jefferson City, Missouri
April 25, 2025*

APPLICATION REQUIREMENTS

Both EMW and EMM were included as applicants in the Application, as Evergy¹ was considering the allocation of a portion of the McNew site to EMM. When supplemental direct was filed, it was decided to allocate this portion of McNew to EMW instead of EMM, leaving EMM as an applicant who was requesting nothing within the case. EMM is still an applicant in the case, and as such a review of application requirements will include it, where necessary. Commission Rule 20 CSR 4240-2.060 outlines the requirements that all applications, including CCNs, must comply with. These requirements include:

- (A) The legal name of each applicant, a brief description of the legal organization of each applicant, whether a Missouri corporation, foreign corporation, partnership, proprietorship, or other business organization, the street and mailing address of the principal office or place of business of each applicant and each applicant's electronic mail address, fax number and telephone number, if any;
- EMW provided its legal name on the first page of its application, this requirement has been met.
 - EMM provided its legal name on the first page of its application, this requirement has been met.
- (B) If any applicant is a Missouri corporation, a Certificate of Good Standing from the secretary of state;
- EMW is a Delaware corporation, this does not apply.
 - EMM is a Missouri corporation, and is in Good Standing,² this requirement is met.
- (C) If any applicant is a foreign corporation, a certificate from the secretary of state that it is authorized to do business in Missouri;
- A certificate for EMW from the secretary of state was filed within the case numbered EN-2020-0064, this requirement is met.
 - EMM is a Missouri Corporation, this does not apply.
- (D) If any applicant is a partnership, a copy of the partnership agreement;
- EMW is not in a partnership, this does not apply.
 - EMW is not in a partnership, this does not apply.

¹ Evergy refers to the parent company of EMM, EMW, and EKC.

² According to the Secretary of State of Missouri website.

- (E) If any applicant does business under a fictitious name, a copy of the registration of the fictitious name with the secretary of state;
- EMW does not operate under a fictitious name, this does not apply.
 - EMM does not operate under a fictitious name, this does not apply.³
- (F) If any applicant is a political subdivision, a specific reference to the statutory provision and a specific reference to any other authority, if any, under which it operates;
- EMW does not have any political subdivision, this does not apply.
 - EMM does not have any political subdivisions, this does not apply.
- (G) If any applicant has submitted the applicable information as set forth in subsections (1)(B)–(F) of this rule in a previous application, the same may be incorporated by reference to the case number in which the information was furnished, so long as such applicable information is current and correct;
- All requirements that apply to EMW in subsections B-F have been included in the Application or incorporated by reference to the case number in which the information was furnished.
 - All requirements that apply to EMM in subsections B-F have been included in the Application or incorporated by reference to the case number in which the information was furnished.
- (H) A brief statement of the character of business performed by each applicant;
- A brief description on EMW's character of business is included in paragraph 2 of its Application. This requirement has been met.
 - A brief description on EMM's character of business is included in paragraph 1 of its Application. This requirement has been met.
- (I) Name, title, address, and telephone number of the person to whom correspondence, communications, and orders and decision of the commission are to be sent, if other than to the applicant's legal counsel;
- Within Paragraph 5 of EMW's Application, Kevin Gunn, Matthew Dority, and Anthony Westenkirchner are mentioned, with all required information, as who all communications should be sent to. It also includes an email that Data Requests should be sent to. This requirement has been met.
 - Within Paragraph 5 of EMM's Application, Kevin Gunn, Matthew Dority, and Anthony Westenkirchner are mentioned, with all required information, as who all

³ Evergy Missouri Metro Inc. does business as Evergy Missouri Metro and Evergy Missouri West Inc. does business as Evergy Missouri West. Neither however has registered a fictitious name with the Missouri Secretary of State.

communications should be sent to. It also includes an email that Data Requests should be sent to. This requirement has been met.

(J) If any applicant is an association, other than an incorporated association or other entity created by statute, a list of all of its members;

- EMW is not an association, this does not apply.
- EMM is not an association, this does not apply.

(K) A statement indicating whether the applicant has any pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment, or decision has occurred within three (3) years of the date of the application;

- EMW explains how it has no pending action or final judgments other than 2 listed cases within Paragraph 4 of its Application. This requirement has been met.
- EMM explains how it has no pending action or final judgments other than 4 listed cases within Paragraph 4 of its Application. This requirement has been met.

(L) A statement that no annual report or assessment fees are overdue; and

- Paragraph 3 states that EMW has no annual report or assessment fees that are overdue. This requirement has been met.
- Paragraph 3 states that EMM has no annual report or assessment fees that are overdue. This requirement has been met.

(M) All applications shall be subscribed and verified by affidavit under oath by one (1) of the following methods: if an individual, by that individual; if a partnership, by an authorized member of the partnership; if a corporation, by an authorized officer of the corporation; if a municipality or political subdivision, by an authorized officer of the municipality or political subdivision; or by the attorney for the applicant if the application includes or is accompanied by a verified statement that the attorney is so authorized

- An affidavit, signed by one of EMW's vice presidents, was included on page 22 of EMW's Application. This requirement has been met.
- An affidavit, signed by one of EMM's vice presidents, was included on page 22 of EMW's Application. This requirement has been met.

Commission Rule 20 CSR 4240-20.045 outlines the requirements for applications for certificates of convenience and necessity pursuant to Section 393.170.1 and 393.170.2, RSMo. According to Section (3) of the rule, the following additional general requirements apply to all applications for a certificate of convenience and necessity, pursuant to Sections 393.170.1 and .2, RSMO:

- (A) The application shall include facts showing that granting the application is necessary or convenient for the public service.
- EMW does include information within paragraphs 35 through 40 of its application, as well as within supporting direct testimony, in an attempt to show that these projects are necessary or convenient. Staff discusses its opinion within the report this schedule is attached to.
- (B) If an asset to be operated or constructed is outside Missouri, the application shall include plans for allocating costs, other than regional transmission organization/independent system operator cost sharing, to the applicable jurisdiction; and
- The costs as well as allocations for the Viola site are discussed on Page 8 of the Application. The costs of the McNew site are discussed within Olsen's supplemental direct testimony while the allocation for the site are discussed within Pages 4 through 7. This requirement does not apply to Mullin Creek #1 as it is being constructed within Missouri.
- (C) If any of the items required under this rule are unavailable at the time the application is filed, the unavailable items may be filed prior to the granting of authority by the commission, or the commission may grant the certificate subject to the condition that the unavailable items be filed before authority under the certificate is exercised.
- All items required by subsections (A) and (B) have been supplied either within the Application or within testimony supporting the application.

According to Section (6) of Commission Rule 20 CSR 4240-20.045, if the application is for authorization to construct an asset under Section 393.170.1, RSMo. The application shall also include additional documentation/information as follows:

- (A) A description of the proposed route or site of construction;
- EMW provided descriptions of the Viola, McNew, and Mullin Creek #1 sites, including aerial views which show the planned layout and location of turbines, property boundaries, emergency generators, and switchyards.⁴
- (B) A list of all electric, gas, and telephone conduit, wires, cables, and lines of regulated and nonregulated utilities, railroad tracks, and each underground facility, as defined in Section 319.015, RSMo, which the proposed construction will cross;
- At the Mullin Creek site, there are no railroad tracks, underground facilities, or utility facilities other than EMW-owned facilities, Schedule JKO-5 of J Kyle Olson's direct testimony. EMW has included labeled locations of underground and utility facilities on

⁴ Viola's layout is shown in Schedule JKO-5, McNew's layout is shown in JKO-6, and Mullin Creek's layout is shown in Schedule JKO-7 of J Kyle Olson's direct testimony.

the Viola and McNew sites within Schedules JKO-6 and JKO-6 of J Kyle Olson's direct testimony. There are no railroad tracks at the Viola and McNew sites.

(C) A description of the plans, specifications, and estimated costs for the complete scope of the construction project that also clearly identifies what will be the operational features of the asset once it is fully operational and used for service;

- EMW has described plans, specifications, and estimated costs for the Viola, McNew, and Mullin Creek sites in the Direct Testimony of Mr. Olson.⁵ The company estimates the total cost for the Viola project to be ** [REDACTED] **, for the McNew project to be ** [REDACTED] **, and for Mullin Creek project to be ** [REDACTED] **. ⁶ EMW and EKC plan to evenly split the costs and ownership of Viola and McNew. EMW plans to fully own Mullin Creek. Staff witness Shawn E. Lange, PE discusses the unit's in-service criteria.

(D) The projected beginning of construction date and the anticipated fully operational and used for service date of the asset;

- EMW plans to begin construction of Viola in the first quarter of 2026, and McNew and Mullin Creek in the first quarter of 2027. Viola is planned to be in-service by January 1, 2029, while McNew and Mullin Creek are planned to be in-service by January 1, 2030.

(E) A description of any common plant to be included in the construction project;

- EMW described an Operations & Maintenance building as well as a number of shared water tanks as being the only common plant included in the projects.

(F) Plans for financing the construction of the asset;

- EMW plans to use its existing debt and equity financing structure to fund the Viola, Mullin Creek, and McNew projects, similar to past projects. ⁷

(G) A description of how the proposed asset relates to the electric utility's adopted preferred plan under 4 CSR 240-22;

- In paragraph 24 of EMW's application, the company discusses how Viola and Mullin Creek correspond to its preferred plan's 2029 and 2030 additions. It also goes on to discuss how part of the McNew project might be acquired by EMW if the company expects additional load growth before 2032 that was not foreseen in the company's last IRP. Within EMW witness Vandavelde's supplemental direct testimony, two economic developments are discussed as reasons for the McNew addition despite it not being included in the 2024 IRP. The first economic development is the addition of a new large

⁵ EMW Response to Staff Data Request 0051 contains additional information on the turbines selected for each site.

⁶ Page 2 of EMW Witness John M. Grace's Supplemental Direct Testimony.

⁷ Paragraph 23 of EMW's Application.

load customer within EMW's territory. The second economic development is a change to SPP's resource adequacy requirements.

(H) An overview of the electric utility's plan for this project regarding competitive bidding although competitive bidding is not required, for the design, engineering, procurement, construction management, and construction of the asset;

- EMW used competitive bidding to select Burns & McDonnell as the Owner's Engineers for the projects from five qualified options, three of which submitted bids at EMW's request. EMW also used competitive bidding while selecting the equipment supplier and the EPC contractor.⁸

(I) An overview of plans for operating and maintaining an asset;

- EMW has asked for a variance for this application requirement, stating that it "will provide more detailed operations and maintenance plans when they are available closer to the Project's respective commercial operations."
- EMW has requested a variance to this requirement, and Staff does not oppose the request. To ensure the Commission and Staff receive the more detailed Operating and Maintenance Plan ("O&M Plan"), Staff recommends the Commission order EMW to file the O&M Plan in this docket within 60-days of the facility being placed in service. At this time, the planned in-service dates are January 1, 2029 for Viola, and January 1, 2030, for McNew and Mullin Creek.

(J) An overview of plans for restoration of safe and adequate service after significant, unplanned/forced outages of an asset; and

- Similar to the above application requirement, EMW has requested a variance to provide the Restoration Plans for each new unit closer to each project's in-service date. Staff does not oppose the request. To ensure the Commission and Staff receive the site-specific Restoration Plans, Staff recommends the Commission order EMW to file Emergency Action Plans⁹ for each site within 60-days of the facility being placed in service. At this time, the planned in-service dates are January 1, 2029 for Viola, and January 1, 2030, for McNew and Mullin Creek.

(K) An affidavit or other verified certification of compliance with the following notice requirements to landowners directly affected by electric transmission line routes or transmission substation locations proposed by the application.

- As all transmission-related construction is planned to occur on vacant, EMW-owned land at least 300 feet from the closest habitable structure, no landowners will be directly affected by any of the three projects.

Staff Expert/Witness: Brodrick Niemeier

⁸ Paragraphs 25 and 26 of EMW's Application.

⁹ These Emergency Action Plans should include plans for restoration of safe and adequate service.

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the Petition of Evergy Kansas) Docket No. 25-EKCE-207-PRE
Central, Inc., Evergy Kansas South, Inc., and)
Evergy Metro, Inc. for Determination of the)
Ratemaking Principles and Treatment that Will)
Apply to the Recovery in Rates of the Cost to be)
Incurred for Certain Electric Generation Facilities)
under K.S.A. 66-1239.)

**DIRECT TESTIMONY
OF
MATT L. ROBBINS
ON BEHALF OF KANSAS GAS SERVICE
A DIVISION OF ONE GAS, INC.**

MARCH 14, 2025

**DIRECT TESTIMONY
OF
MATT L. ROBBINS
ON BEHALF OF KANSAS GAS SERVICE
A DIVISION OF ONE GAS, INC.**

1 **I. POSITION AND QUALIFICATIONS**

2 **Q. Please state your name and business address.**

3 A. My name is Matt L. Robbins. My business address is 7421 W. 129th Street,
4 Overland Park, Kansas 66213.

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

6 A. I am the Director of Gas Supply for Kansas Gas Service, a division of ONE
7 Gas, Inc. (“KGS” or “Company”).

8 **Q. What are your responsibilities in your current position?**

9 A. As Director of Gas Supply, I have primary responsibility for KGS’s gas supply
10 operations. My responsibilities include oversight of gas supply planning,
11 forecasting, scheduling, upstream service procurement, upstream contract
12 administration, accounting, gas control operations, and regulatory compliance.
13 Under gas supply planning, I am responsible for the planning and management
14 of KGS’s storage contracts and inventory balances.

15 **Q. Please describe your education and professional experience.**

16 A. I have a Master of Business Administration degree with an emphasis in Finance
17 from Oklahoma City University, and a Bachelor of Science degree in Business
18 Administration from Oklahoma State University. I began my employment with
19 Oklahoma Natural Gas (“ONG”) in July 1994 as a meter reader. Like KGS,

1 ONG is a division of ONE Gas, Inc. I completed three years in the Corporate
2 Professional Development Program, where I rotated through all functions of
3 ONG. My experience also includes eight years as an analyst for ONG's Rate
4 and Regulatory Affairs Department and 13 years in a management capacity for
5 ONG's Gas Supply. In 2013, I became the Director of Gas Supply for ONG. In
6 2018, I began working at KGS as Director of Gas Supply.

7 **Q. Can you briefly describe KGS?**

8 A. KGS is a natural gas public utility operating in the state of Kansas pursuant to
9 certificates of convenience and necessity issued by the Kansas Corporation
10 Commission ("Commission"). KGS is the largest natural gas public utility in
11 Kansas, serving approximately 650,000 customers in over 360 communities.
12 As part of its public utility obligations to its customers, KGS is required to
13 maintain an adequate and reliable supply of natural gas for its retail sales
14 customers.

15 **Q. Have you previously testified before the Commission?**

16 A. Yes.

17 **Q. Was this testimony prepared by you or under your direction?**

18 A. Yes, it was.

19 **II. PURPOSE OF TESTIMONY**

20 **Q. What is the purpose of your testimony?**

21 A. The purpose of my testimony is to inform the Commission and stakeholders
22 about how KGS's operations might be affected by Evergy Kansas Central, Inc.,
23 Evergy Kansas South, Inc., and Evergy Metro, Inc.'s ("Evergy") proposed
24 Combined Cycle Gas Turbines ("CCGTs"). Like Evergy, KGS must provide

1 sufficient and efficient service at just and reasonable rates. The Commission
2 should consider how Evergy's generation fleet could impact KGS and other
3 natural gas utilities in meeting their customers' needs. KGS does not oppose
4 Evergy's request. KGS believes natural gas is a vital fuel for the American
5 economy and the State of Kansas. At the same time, KGS believes more
6 coordination and cooperation between natural gas and electric public utilities
7 during extreme weather can help provide customers reliable service. My
8 testimony points out potential bottlenecks and suggests reasonable conditions
9 for the Commission to attach to any predetermination ruling.

10 **Q. Please briefly describe Evergy's Petition.**

11 A. On November 6, 2024, Evergy filed a Petition for Determination of Ratemaking
12 Principles and Treatment with the Commission with respect to its plan to build,
13 among others, two natural gas CCGT electric generation facilities in Reno and
14 Sumner Counties in Kansas. Each CCGT will have a capacity of 710
15 megawatts (MWs).

16 **Q. Why did KGS intervene in this docket?**

17 A. KGS's Petition for Intervention, filed November 18, 2024, indicated the
18 Company's concern with how increased demand for natural gas supplies and
19 pipeline capacity to meet the needs of electric public utilities would affect KGS's
20 ability to meet its own service obligations. KGS currently utilizes the services
21 of upstream interstate and intrastate pipelines to provide pipeline capacity
22 service and natural gas producers and marketing companies to provide natural
23 gas supplies on those pipelines. Given the finite number of pipelines and

1 suppliers, Evergy is all but certain to need services from one or more of these
2 same entities. Extreme weather events, like Winter Storm Uri, create a
3 significant demand for natural gas pipeline capacity and supplies. It is
4 important that consideration of adequate upstream services and any reliability
5 coordination efforts take place now as the projects are under consideration,
6 rather than when a significant weather event is impacting Kansas. Intervening
7 in this docket allows KGS to bring these issues before the Commission and
8 allow all stakeholders to have an expanded discussion on serving customers –
9 gas and electric – reliably.

10 **III. CAPACITY NEEDS OF THE CCGT PLANTS AND GAS SUPPLY ISSUES**

11 **A. Capacity Needs**

12 **Q. Can you please summarize your concerns about pipeline capacity?**

13 A. Yes. Based on publicly available information, KGS believes there are
14 constraints that will limit Evergy's ability to operate its proposed CCGTs. These
15 capacity restrictions could impact how KGS provides service to its customers.
16 To operate the CCGTs, Evergy is all but certain to need firm pipeline capacity.
17 Based on where the plants will be located, there simply may not be enough firm
18 capacity available. To address this concern, KGS proposes Evergy report to
19 the Commission it has secured adequate firm capacity to operate the plants. I
20 describe the reporting condition later in my testimony.

21 **Q. How much pipeline capacity do you believe will be necessary to serve the**
22 **two CCGT generation plants?**

1 A. At the outset, let me be clear that my estimate is based purely on publicly
 2 available information and not on any highly confidential responses to data
 3 request provided in this docket. KGS agrees with Evergy on the need to protect
 4 highly confidential gas supply information. I estimate the CCGTs will require
 5 approximately 222,000 Dekatherms (“Dth”) to 240,000 Dth of natural gas to
 6 operate continuously for a 24-hour period. According to Evergy Witness Mr. J
 7 Kyle Olson, Evergy’s proposed CCGT generation units will use the Mitsubishi
 8 M501JAC gas turbine.¹ The M501JAC gas turbine’s combined cycle
 9 performance has a heat rate of approximately 6,500 British Thermal Units
 10 (“BTUs”) per kilowatt hour (“KWh”).² The following table illustrates my estimate.

11 **Table 1: Heat Rate to Consumption Estimate**

Calculate Daily Megawatt Hours	710 MW per CCGT	x	24 hours	=	17,040 MWh per CCGT
Convert to Kilowatt Hours	17,040 MWh	x	1,000	=	17,040,000 KWh
BTUs needed to generate Kilowatt Hours	17,040,000 KWh	x	6,500 BTUs	=	110,760,000,000 BTUs
Convert BTU to Dekatherms	110,760,000,000 BTUs	/	1,000,000	=	110,760Dth per CCGT

12 As shown in Table 1, I estimate each CCGT will require 110,760 Dth of natural
 13 gas if the turbine is run continuously over a 24-hour period. I assumed the
 14 CCGTs would run continuously since Mr. Olson indicates the plants will provide
 15 base load energy.³

¹ See Direct Testimony of J Kyle Olson, Exhibits JKO-6 and JKO-7, Docket No. 25-EKCE-207-PRE (Nov. 6, 2024) (Olson Direct).

² See *Jackson Generation Pioneers North America’s First M501JAC Gas Turbines*, Oct 1, 2024, available at <https://www.powermag.com/jackson-generation-pioneers-north-americas-first-m501jac-gas-turbines/> (last visited Mar. 14, 2025).

³ Olson Direct, page 31, line 23 through page 32, line 2.

1 **Q. Are there any other sources of information that could be used to estimate**
2 **the CCGTs’ natural gas consumption?**

3 A. Yes. Public information published by the United States Energy Information
4 Administration (“EIA”) indicates that CCGT plants have an average operation
5 heat rate of approximately 7,146 Btu/kWh.⁴ Using this heat rate, each CCGT
6 would require approximately 120,000 Dth of natural gas per day, for a
7 combined total of approximately 240,000 Dth of natural gas per day.

8 **Q. Has Evergy studied the availability of firm upstream pipeline capacity in**
9 **Kansas?**

10 A. Evergy does not provide specific information on the current availability of firm
11 upstream pipeline capacity. However, it appears that Evergy anticipates
12 additional pipeline capacity will be necessary. Mr. Olson indicates that Evergy
13 is working with upstream pipelines on detailed studies. He states:

14 Once a project is determined to be feasible and necessary for
15 the new generation to be built, the parties would then execute
16 a precedent agreement that would allow the pipelines to begin
17 developing the infrastructure. . .⁵

18 **Q. Can you briefly explain natural gas transportation service?**

19 A. Generally, upstream pipelines provide “firm” and “interruptible” transportation
20 service. Firm pipeline transportation service is typically used by customers who
21 need a reliable and uninterrupted supply of natural gas, such as residential
22 heating, industrial processes, and power generation plants that operate
23 continuously. Customers who have firm service pay a fixed reservation (or

⁴ <https://www.eia.gov/todayinenergy/detail.php?id=52158>

⁵ Olson Direct, page 32.

1 demand) charge for the amount of capacity they need, as well as a volumetric
2 charge based on how much natural gas they ship. On the other hand,
3 interruptible pipeline transportation service is often used by customers who
4 have more flexibility in their gas usage, such as industrial users with alternative
5 fuel options or businesses that can adjust their operations based on natural gas
6 availability. This service is often available at a reduced cost – customers only
7 pay a volumetric charged based on the amount of natural gas shipped since
8 they are not “reserving” capacity on a pipeline. However, these customers can
9 be interrupted to serve firm customers during periods of high demand.

10 **Q. What type of pipeline capacity does KGS contract for?**

11 A. KGS contracts for firm pipeline capacity. KGS needs to provide reliable natural
12 gas service to its customers during high periods of demand and cannot be in a
13 position where service could be interrupted.

14 **Q. How does KGS meet its service obligations?**

15 A. KGS uses the transportation service of twelve (12) pipelines (both interstate
16 and intrastate). The Company contracts with transportation providers for firm
17 capacity at the highest priority and in sufficient quantities to meet the highest
18 demand on a peak day. The contracts KGS seeks for the benefit of its
19 customers grant the Company with the right to move gas on the pipelines
20 directly to KGS’s city gates.

21 **Q. Can you provide more detail concerning natural gas transportation**
22 **providers and services in Kansas?**

1 A. Yes. One of the largest providers of transportation services to Kansas is
2 Southern Star Central Gas Pipeline, Inc. (“SSC”). A system map of SSC is
3 attached as Exhibit MLR-1. SSC’s current published daily transportation
4 capacity is 2.4 Bcf (2,400,000 Dth per day).⁶

5 **Q. Does KGS use SSC to meet its customers’ needs?**

6 A. Yes. KGS relies heavily upon SSC to provide firm transportation service. SSC
7 provides approximately 70% of KGS’s firm transportation service. To put that
8 in context, KGS has reserved approximately 25% of SSC’s total capacity. KGS
9 currently has contracted to ship approximately 630,000 Dth per day on SSC.

10 **Q. Will Evergy need to utilize upstream services from SSC to operate its
11 proposed CCGTs?**

12 A. I believe so. Based on information from the National Pipeline Mapping System,
13 SSC is the closest interstate pipeline to both proposed CCGTs. In full candor,
14 and as noted in Evergy’s Motion to Modify Protective Order filed January 30,
15 2025, KGS has submitted a bid to develop pipeline infrastructure needed to
16 serve one of the plants. However, Evergy will likely need access to interstate
17 gas markets to obtain the volumes necessary to operate the plants. If that ends
18 up being SSC, then it is important to consider SSC’s ability to serve this
19 additional demand.

20 **Q. Do you have any concerns about capacity on SSC?**

⁶ See Southern Star 101 presentation, p. 3, available at <https://csimain.southernstar.com/EBBPostingDocs/ReportReferenceList/117226.pdf> (last visited Mar. 13, 2025); See also Southern Star – About Us, available at <https://southernstar.com/about-us/> (last visited Mar. 13, 2025).

1 A. Yes. Attached as Exhibit MLR – 2 is a copy of a public slide presented by SSC
2 at a recent customer meeting. This slide shows that SSC is 100% subscribed
3 (has no available firm pipeline capacity), as of February 1, 2025, in the market
4 area and has 128,000 Dth per day of firm pipeline capacity available in the
5 production area on its Kansas-Hugoton line. Everygy’s proposed CCGTs are
6 located in SSC’s production area.

7 **Q. Why is this a concern?**

8 A. As shown above, based on publicly available information and assumptions,
9 KGS estimates the proposed CCGTs will consume approximately 240,000 Dth
10 per day. This appears to exceed the current available capacity in SSC’s
11 production area by nearly 75%.

12 **Q. Is SSC attempting to add capacity?**

13 A. Yes. On November 18, 2024, SSC filed an application at the Federal Energy
14 Regulatory Commission seeking a Certificate of Public Convenience and
15 Necessity to construct, install, operate, and maintain a new compressor station
16 in Osage County, Oklahoma (the “Cedar Vale Compressor”). This project
17 would add approximately 98,000 Dth per day of incremental firm capacity for
18 transportation in SSC’s Market Area and approximately 35,000 Dth per day of
19 incremental firm capacity for transportation in SSC’s Production Area.
20 According to SSC, “This added compression will assist shippers in moving gas
21 to the growing markets in and around Springfield, Joplin, Kansas City, and
22 Topeka in Missouri and Kansas.”⁷ However, since the proposed CCGTs are

⁷ Abbreviated Application for a Certificate of Public Convenience and Necessity, FERC Docket No. CP25-19, p. 1 (Nov 18, 2024).

1 not in these markets its unclear whether the capacity added by the Cedar Vale
2 Compressor could support Evergy's proposed CCGTs. Southern Star also
3 recently conducted a binding open season for capacity on its Canadian
4 Blackwell line segment in Oklahoma, but it is unclear whether this capacity
5 could be used to support the proposed CCGTs. Finally, Southern Star has
6 announced a nonbinding open season to add approximately 600,000 Dth per
7 day of capacity at five interconnects across their system.

8 **Q. Cheyenne Plains Gas Pipeline ("Cheyenne Plains") is also a larger**
9 **provider of interstate natural gas transportation services to Kansas.**
10 **Could Evergy rely on Cheyenne Plains to serve its plants?**

11 A. Possibly. Cheyenne Plains has a daily capacity of 800,000 Dth. As of January
12 1, 2025, Cheyenne Plains had 167,252 Dth per day capacity available in
13 Kansas.⁸ However, given the location of the proposed CCGTs, it's likely any
14 volumes transported through Cheyenne Plains would still need to ship through
15 SSC or KGS (both SSC and KGS have interconnections with Cheyenne
16 Plains).

17 **Q. How do your pipeline capacity concerns impact the proposed CCGTs?**

18 A. My concerns simply highlight the need to confirm Evergy has secured sufficient
19 capacity necessary to operate the plants before they are scheduled to come
20 online.

21 **Q. If Evergy secures firm capacity on upstream pipelines to operate its**
22 **CCGTs, does that fully address KGS's concern?**

⁸ See Cheyenne Plains Index of Customers, 4th Quarter, 2024, available at <https://pipeline2.kindermorgan.com/IndexOfCust/IOC.aspx?code=CP> (last visited Mar. 14, 2025).

1 A. No. Larger events that impact the region's natural gas resources pose
2 additional challenges the Commission should be mindful of.

3 **B. Natural Gas Supply Issues**

4 **Q. Can you briefly describe KGS's natural gas supply concerns?**

5 A. Yes. Extreme weather events can disrupt natural gas supplies. In those
6 circumstances, multiple parties (suppliers, marketers, and consumers) may
7 suddenly find their gas supply plans disrupted with only a limited number of
8 alternatives available. Take, for example, Winter Storm Uri. During the storm,
9 natural gas suppliers were impacted by wellhead freeze offs and processing
10 plant performance issues. As I testified in Docket No. 21-KGSG-332-GIG:

11 Throughout the storm, suppliers of both next-day and same-day gas
12 supplies were telling the Company's Gas Supply manager they
13 would do their best to provide the gas they quoted to KGS, but they
14 were also giving oral force majeure notices over the phone at the
15 time KGS was attempting to secure the needed gas. During this time,
16 upstream pipeline conditions were changing and deteriorating. KGS
17 experienced pressure issues at a few city gates, and for a period of
18 time was concerned about losing the Jayhawk processing plant
19 located in Southwest Kansas and owned and operated by Scout
20 Energy Partners which drastically reduced its ability to supply gas
21 into Southern Star, who supplies a majority of KGS's customers. Gas
22 Supply had to quickly work with upstream partners to purchase
23 additional gas to cover expected supply reductions.

24 Winter Storm Uri spurred the Governor of Kansas to declare a State of
25 Emergency and led to 13 days of below freezing temperatures. All upstream
26 pipelines with which KGS contracts for transportation capacity and storage
27 services issued Operational Flow Orders ("OFOs") due to the shortage of
28 natural gas supplies and KGS followed suit. Additionally, during this time KGS
29 requested that large commercial and industrial customers curtail usage to

1 assist the Company in ensuring service to human needs customers and
2 provided tips to residential customers to conserve energy.

3 **Q. How could Evergy's CCGTs impact KGS in another Winter Storm Uri?**

4 A. The additional load could make it difficult for KGS and others to secure enough
5 natural gas on a peak day to meet their requirements. In most situations,
6 adequate natural gas supplies are available on the upstream pipelines that
7 provide service to Kansas. However, the availability and reliability of those gas
8 supplies can become an issue during periods of extreme weather conditions
9 such as were experienced in Winter Storm Uri.

10 **Q. Was this a key issue during Winter Storm Uri?**

11 A. Yes. Recognizing the Jayhawk Plant was experiencing performance issues,
12 KGS had to quickly secure gas from marketers who utilized other pipelines to
13 cover expected supply reductions. For example, if KGS believes its supply of
14 gas at one location may be curtailed, then the Company needs to find a way to
15 fill it from somewhere else.

16 **Q. How does that impact Evergy's proposed CCGTs?**

17 A. In a large, extreme weather event, KGS, Evergy, and others may experience
18 widespread supply disruptions. There simply may not be enough natural gas
19 supplies or pipeline capacity on alternative paths available for all parties.
20 Parties can have ample capacity to meet their needs reserved on a pipeline,
21 but if the supplies that are able to be delivered into that pipeline are interrupted
22 then the shortfall needs to be made up elsewhere.

1 **Q. Does KGS have experience with how power plant demand can impact its**
2 **system during extreme weather?**

3 A. Yes. Electric utilities also faced challenges during Winter Storm Uri. In
4 attempting to respond to needs of the Southwest Power Pool (“SPP”) and
5 electricity customers, the electric utilities posed challenges for KGS.
6 Specifically, KGS was concerned that Evergy’s McPherson and Hutchinson
7 Energy Center natural gas-fired power plants, which KGS serves directly off of
8 its transmission system, would be dispatched simultaneously without notice
9 intraday by the SPP. Essentially, KGS was concerned Evergy would not be
10 able to find adequate intraday natural gas supplies to cover their combined
11 power plant loads forcing KGS to cover their deficiency. KGS experienced this
12 just prior to the coldest days of Winter Storm Uri observing an unanticipated
13 combined flow rate of approximately 80,000 Dth per day to Evergy’s power
14 plants.

15 **Q. How did this impact KGS?**

16 A. KGS nearly lost service to the northeast end of its transmission system which
17 includes the towns of Seneca and Silver Lake because the supplies for the
18 sudden increase in usage had not been nominated and delivered into KGS’s
19 system.

20 **Q. When natural gas service to customers is lost, how difficult is it for KGS**
21 **to restore service?**

22 A. A natural gas outage is a significant event that can impact customers for hours
23 or days. Essentially, service to each customer in the impacted area has to be

1 shut off. Once this has occurred the system can be purged and gas
2 reintroduced. As a final step, KGS must go door-to-door to reinstate service
3 and perform required safety checks. If service is lost during a major weather
4 event, customers could be without service at the same time they are
5 experiencing life threatening temperatures. Adding to the concern is the safety
6 of our employees, who would need to venture into these harsh conditions to
7 begin the restoration process. And while they are restoring service, they would
8 be unavailable to respond to emergent situations elsewhere.

9 **Q. What actions did KGS take as a result of Evergy's unexpected usage?**

10 A. KGS determined it was necessary to impose a customer-specific Operational
11 Flow Order ("OFO") which limited Evergy's combined flow rate to 30,000 Dth
12 per day, provided that Evergy could secure adequate daily gas supplies to
13 cover their combined power plant load. KGS also requested that Evergy
14 engage in more frequent communication about impending usage.

15 **Q. Did Evergy adhere to KGS's customer-specific OFO?**

16 A. Yes. Evergy determined it would utilize an alternative fuel during Winter Storm
17 Uri to operate its plants.

18 **Q. Has communication with electric utilities improved since Winter Storm
19 Uri?**

20 A. Yes. However, with the proposed addition of the CCGTs, further action by the
21 Commission is required. The main point of my testimony is to illustrate that
22 natural gas infrastructure and markets impact how electric generation units can

1 operate, and the operation of electric generation units can impact natural gas
2 systems.

3 **IV. CONDITIONS ON APPROVAL**

4 **Q. Should the Commission place some conditions on approval of the CCGT**
5 **plants?**

6 A. Yes. KGS believes the Commission should place two conditions on its
7 approval of Evergy's proposed CCGT plants. First, the Commission should
8 require Evergy to report it has secured adequate upstream pipeline capacity to
9 operate the plants in a manner that will not interfere with KGS's operations.
10 Second the Commission should require Evergy and KGS to enter into a
11 coordination agreement prior to the plants coming online.

12 **Q. Please describe your proposed reporting condition.**

13 A. The Commission should require Evergy to file in this docket a report showing
14 that:

- 15 • adequate upstream pipeline transportation capacity to natural gas
- 16 supply basins has been identified; and
- 17 • Evergy has contracted for this pipeline capacity.

18 Importantly, this report would not contain information on Evergy's agreements
19 for the natural gas supplies themselves. Evergy would not, and should not, be
20 required to publicly disclose its contracts or agreements for natural gas
21 supplies, prices, or the volumes delivered by any particular supplier or
22 marketer. KGS believes natural gas pricing information is highly confidential.
23 Contracted pipeline capacity, however, is public information. The report should

1 be reviewed and approved by the Commission prior to the CCGTs being placed
2 in service, with all parties having the ability to weigh in on the report before it is
3 approved by the Commission.

4 **Q. Please describe your proposed coordination condition.**

5 A. KGS requests that the Commission condition its approval of the CCGTs on
6 requiring Evergy and KGS to enter into a coordination agreement prior to the
7 CCGTs being placed in service. The coordination agreement shall address
8 communication, preparation and readiness measures to be taken by Evergy
9 and KGS with respect to mutual natural gas pipeline capacity and gas supply
10 issues that may arise due to extreme weather and other extraordinary events.
11 The overall goal of the agreement will be to maintain and improve the reliability
12 of the gas and electric energy systems used to provide service to Kansas
13 customers.

14 **VII. CONCLUSION**


15 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

16 A. Yes, it does.

VERIFICATION


STATE OF KANSAS)
) ss.
COUNTY OF JOHNSON)

Matthew L. Robbins, being duly sworn upon his oath, deposes and states that he is the Director, Gas Supply for Kansas Gas Service, a Division of ONE Gas, Inc.; that he has read and is familiar with the foregoing Direct Testimony filed herewith; and that the statements made therein are true to the best of his knowledge, information, and belief.



Matthew L. Robbins

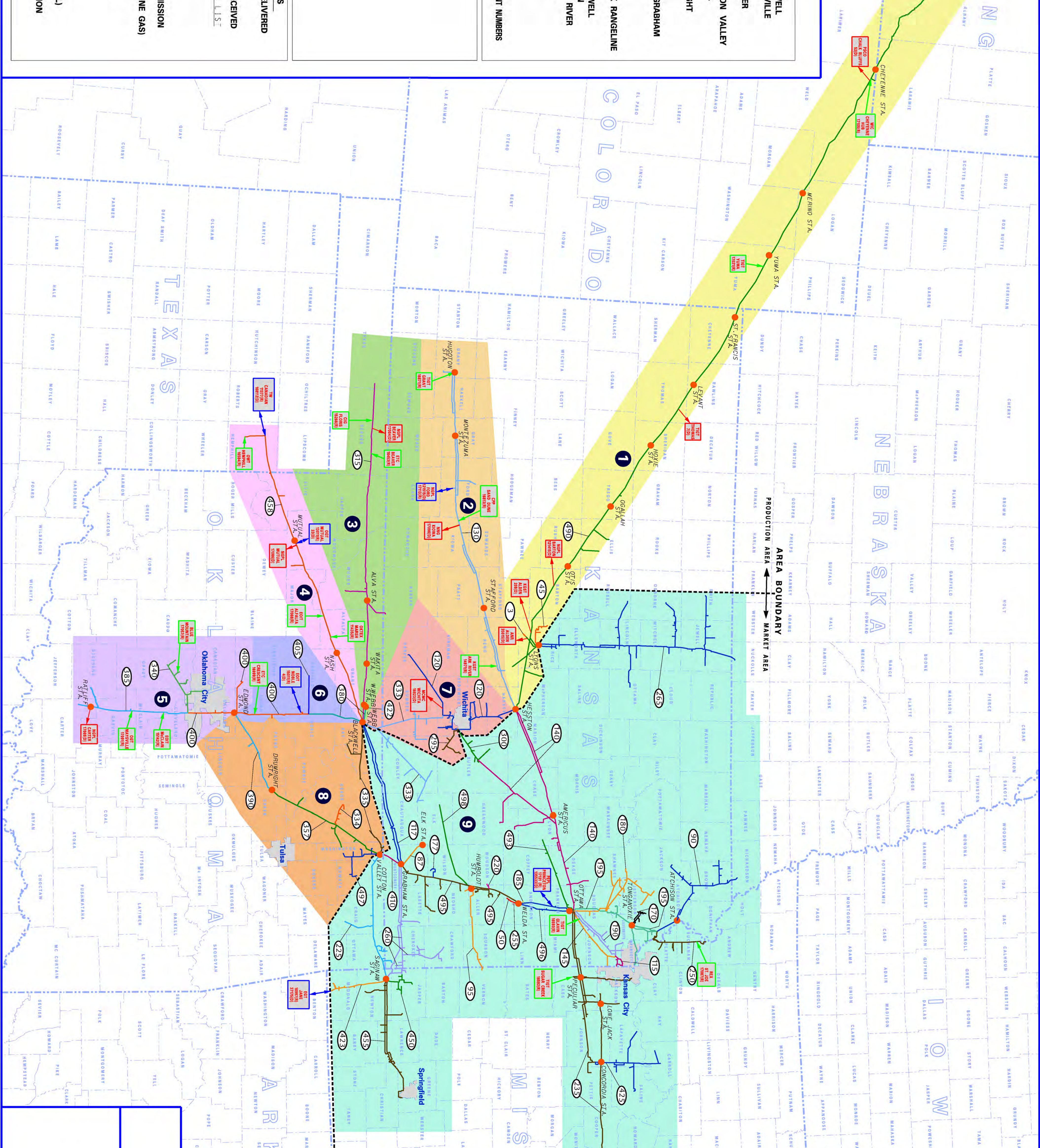
Subscribed and sworn to before me this 13 day of March 2025.



NOTARY PUBLIC

My appointment Expires:
6/5/2026





CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing testimony was sent via electronic mail this 14th day of March, 2025, addressed to:

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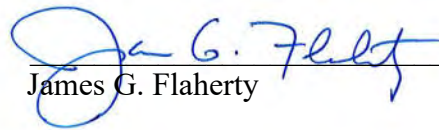
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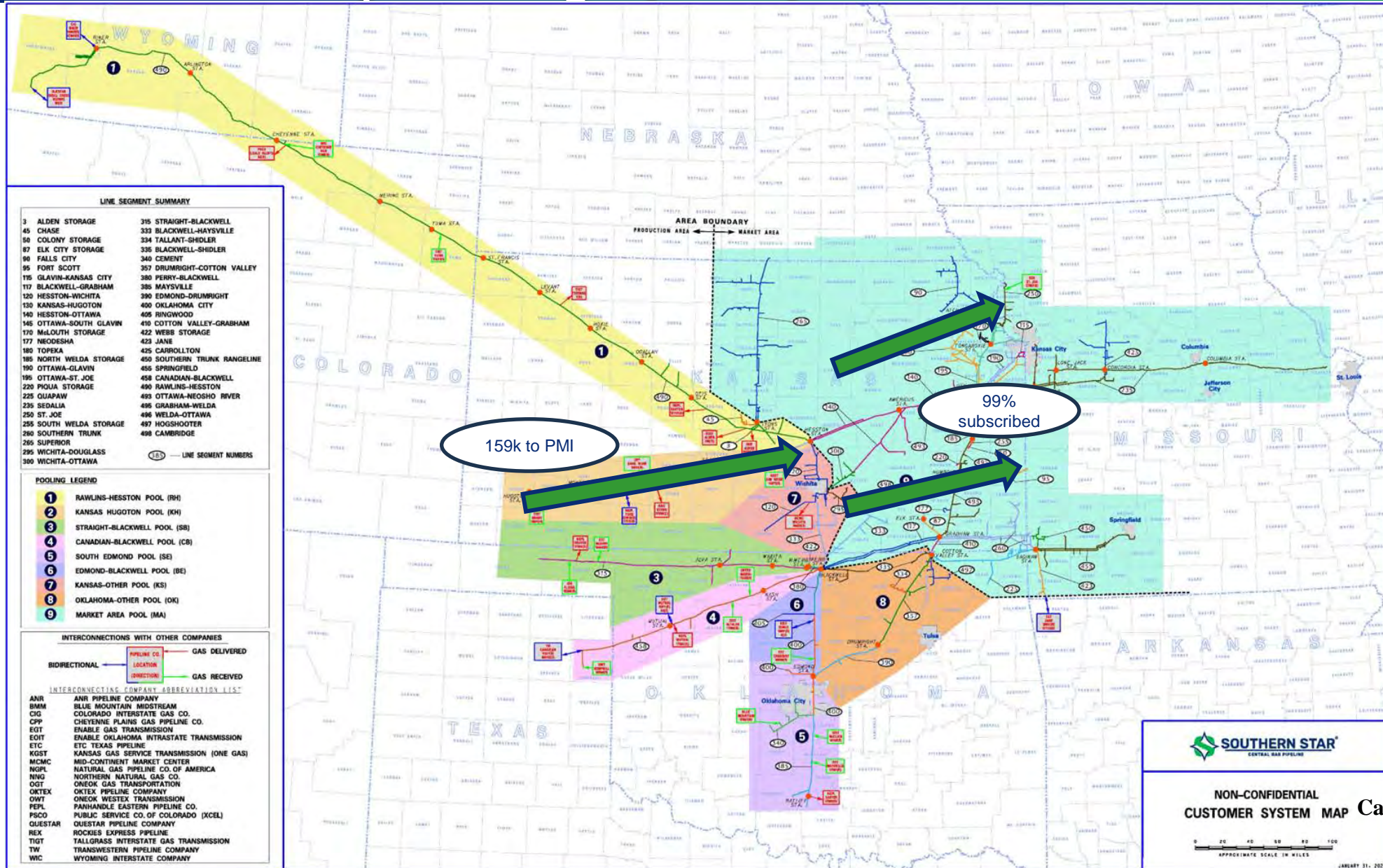
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Available Capacity (4/1)



Case No. EA-2025-0075

SCHEDULE 4

HAS BEEN DEEMED

CONFIDENTIAL

IN ITS ENTIRETY

KIMBERLY K. BOLIN
OF
CREDENTIALS AND CASE PARTICIPATION

Present Position:

I am the Director of the Financial and Business Analysis Division of the Missouri Public Service Commission.

Educational Credentials and Work Experience:

I graduated from Central Missouri State University in Warrensburg, Missouri, with a Bachelor of Science in Business Administration, major emphasis in Accounting, in May 1993. Prior to working at the Commission, I was employed by the Missouri Office of the Public Counsel (OPC) as a Public Utility Accountant from September 1994 to April 2005. In April 2005, I began my employment with the Missouri Public Service Commission. In October 2019, I became manager of the Auditing Department of the Missouri Public Service Commission. I was promoted to the Division Director of the Financial and Business Analysis Division in March 2022. I have been employed by this Commission or by OPC as a Regulatory Auditor for over 25 years, and have submitted testimony on ratemaking matters numerous times before the Commission.

Case Participation

<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<u>Contested or Settled</u>
Spire Missouri	GR-2025-0107	<u>Direct</u> – Short-term debt	
Missouri-American Water Company	WR-2024-0320	<u>Direct/Rebuttal</u> – Tracker Policy, True-up, Discrete Adjustments, Depreciation and Carrying Costs Deferral <u>Cross-Surrebuttal</u> – Depreciation and Carrying Costs Deferral	Pending Settlement
Ameren Missouri	EA-2024-0237	<u>Rebuttal</u> – Overview of Staff’s Filing	Settled
Confluence Rivers Utility Operating Company	WR-2023-0006	<u>Direct</u> – Income Taxes <u>Surrebuttal</u> – Income Taxes	Contested
Missouri-American Water Company	WR-2022-0303	<u>Direct</u> – COVID 19 AAO Amortization, Test Year/True-Up/Discrete Adjustments <u>Rebuttal</u> - Bad Debt Tracker, Production Cost Tracker, Property Tax Tracker, Discrete Adjustments, Depreciation and Carrying Cost Deferral, Affiliate Transactions Rules <u>Surrebuttal</u> - Depreciation and Carrying Costs Deferral, Discrete Adjustments	Contested
Spire Missouri	GR-2022-0179	<u>Direct</u> – Short-term debt <u>Rebuttal</u> – Short-term debt	Pending Settlement
Evergy Missouri West	EF-2022-0155	<u>Rebuttal</u> – Winter Storm Uri, Affiliate Transactions <u>Surrebuttal</u> – Winter Storm Uri, Affiliate Transactions, Tax Savings	Contested
Evergy Missouri	ER-2022-0129/ER-2022-0130	<u>Direct</u> – COVID AAO, Winter Storm Uri Jurisdictional Allocations <u>Rebuttal</u> - Trackers <u>Surrebuttal</u> – Winter Storm Uri Jurisdictional Allocations	Settled
The Empire District Electric Company	EO-2022-0040/EO-2022-0193	<u>Rebuttal</u> – ADIT and EADIT, Sharing of Costs, Decommissioning Costs, Winter Storm Uri AAO, Interest Earned on Capital Subaccount <u>Surrebuttal</u> – Asbury Environmental Asset/ARO, ADIT and EADIT	Contested
Ozarks Medical Center vs. Summit Natural Gas of Missouri, Inc.	GC-2022-0158	<u>Rebuttal</u> – Accounting Authority Order	Contested

<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<u>Contested or Settled</u>
The Empire District Gas Company	GR-2021-0320	<u>Direct</u> – Excess ADIT and Tax Tracker	Settled
The Empire District Electric Company	EU-2021-0274	<u>Rebuttal</u> – Winter Storm Uri AAO	Pending
The Empire District Electric Company	ER-2021-0312	<u>Cost of Service Report</u> – ARO, Amortization of Excess ADIT, Regulatory Lag and Risk Mitigation <u>Rebuttal</u> – Business Risk, Paygo, AROs, Transmission Tracker <u>Surrebuttal</u> - Non-FAC Wind Revenues, ADIT and Excess ADIT, Iatan/PCB Environmental Costs, Market Price Protection Mechanism, Winter Storm Uri	Settled
Ameren Missouri	ER-2021-0240	<u>Cost of Service Report</u> – COVID-19 AAO Cost Recovery, Rate Switching Tracker, Allocation Factors, Company Owned Life Insurance, Equity Issuance Costs, Tracker Mechanisms Proposals Policy <u>Surrebuttal</u> – Normalization of COVID-19 Costs, Allocations, AMI Software	Settled
Ameren Missouri	GR-2021-0241	<u>Cost of Service Report</u> - COVID-19 AAO Cost Recovery, AMI-Software, Allocation Factors <u>Surrebuttal</u> – Normalization of COVID-19 Costs, AMI Software	Settled
Evergy Missouri Metro and Evergy Missouri West	ET-2021-0151	<u>Rebuttal Report</u> – Accounting	Contested
Spire Missouri	GR-2021-0108	<u>Cost of Service Report</u> – COVID-19 AAO Recovery <u>Surrebuttal</u> – Trackers	Settled

<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<u>Contested or Settled</u>
Missouri-American Water Company	WR-2020-0344	<u>Cost of Service Report</u> – Future Test Year, Credit Card Fee Expense, Amortization of Excess ADIT, COVID-19 AAO Recovery <u>Rebuttal</u> – Future Test Year, COVID-19 AAO Recovery, Amortization of Excess ADIT, Affiliate Transactions, AFUDC Rate <u>Surrebuttal</u> – Future Test Year, COVID-19 AAO, Tax Cut and Jobs Act of 2017, Outside Services, COVID Impacts on Revenue	Settled
Spire Missouri, Inc.	GU-2020-0376	<u>Rebuttal</u> – Accounting Authority Order, Lost Revenues	Settled
Evergy Metro, Inc., d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West	EU-2020-0350	<u>Rebuttal</u> – Accounting Authority Order, Lost Revenue, Carrying Costs	Contested
Empire District Electric Company	ER-2020-0311	<u>Rebuttal</u> – Coal Inventory Adjustment <u>Surrebuttal</u> – Coal Inventory Adjustment	Settled
Empire District Electric Company	ER-2019-0374	<u>Direct</u> – Overview of Staff’s Filing <u>Cost of Service Report</u> – Executive Overview, Test year/True-Up Period, Vegetation Management Tracker Regulatory Asset, Iatan and Plum Point Carrying Costs, Stub Period Tax Cut/Removal of Tax Impact, Tornado AAO, Rate Case Expense Sharing, Credit Card Fees, Clearing Accounts <u>Rebuttal</u> – Asset Retirement Obligations, AAO and Tracker Policy, Affiliate Transactions <u>Surrebuttal/True-Up</u> – Unamortized Balance of Joplin AAO, Credit Card Fees, Payroll Test year, Rate Case Expense Sharing, LED Lighting, Low-Income Pilot Program Amortization, Affiliate Transactions <u>Supplemental</u> – Jurisdictional Allocations, Rate Case Expense, Management Expense, Pension and OPEBs, Affiliate Transactions, Software Maintenance	Contested

<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<u>Contested or Settled</u>
Confluence Rivers Utility Operating Co., Inc.	WA-2019-0299	<u>Surrebuttal</u> – Quality of Service <u>Direct</u> – Net Book Value of Plant	Contested
Osage Utility Operating Co., Inc.	WA-2019-0185	<u>Surrebuttal</u> – Rate Base, Acquisition Incentive	Contested
Spire Inc.	GO-2019-0115 and GO-2019-116	<u>Staff Direct Report</u> – Blanket Work Orders and Current Income Taxes	Contested
Empire District Electric Company and Liberty Utilities	AO-2018-0179	<u>Direct</u> – Moneypool <u>Surrebuttal</u> - Moneypool	Contested
Confluence Rivers Utility Operating Company, Inc.	WM-2018-0116 and SM-2018-0117	<u>Direct</u> – Rate Base, Roy L Utilities	Settled
Spire Missouri Inc.	GO-2016-0332, GO-2016-0333, GO-2017-0201, GO-2017-0202 GO-2018-0309 and GO-2018-0310	<u>Direct</u> – Removal of Plastic Main and Service Line Replacement Costs	Contested
Missouri-American Water Company	WR-2017-0285	<u>Cost of Service Report</u> – Pension/OPEB Tracker, FAS 87 Pension Costs, FAS 106 OPEBs Costs, Franchise Taxes <u>Rebuttal</u> – Defined Contribution Plan, Cloud Computing, Affiliate Transaction Rule (Water Utility) <u>Surrebuttal</u> – Rate Case Expense	Settled
Missouri-American Water Company	WO-2018-0059	<u>Direct</u> – ISRS Overview, Accumulated Deferred Income Taxes, Reconciliation	
Missouri Gas Energy and Laclede Gas Company	GO-2016-0332 and GO-2016-0333	<u>Rebuttal</u> – Inclusion of Plastic Main and Service Line Replacements	Contested
Empire District Electric Company/Liberty Utilities	EM-2016-0213	<u>Rebuttal</u> – Overview of Transaction, Ratemaking /Accounting Conditions, Access to Records <u>Surrebuttal</u> – OPC Recommended Conditions, SERP	Settled
Hillcrest Utility Operating Company, Inc.	WR-2016-0064	<u>Direct</u> – Partial Disposition Agreement	Contested

<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<u>Contested or Settled</u>
Empire District Electric Company	ER-2016-0023	<u>Requirement Report</u> – Riverton Conversion Project and Asbury Air Quality Control System <u>Direct</u> – Overview of Staff’s Revenue Requirement Report and Overview of Staff’s Rate Design Filing	Settled
Missouri-American Water Company	WR-2015-0301	<u>Report on Cost of Service</u> – Corporate Allocation, District Allocations <u>Rebuttal</u> – District Allocations, Business Transformation <u>Surrebuttal</u> – District Allocations, Business Transformation, Service Company Costs	Settled
Empire District Electric Company	ER-2014-0351	<u>Direct</u> – Overview of Staff’s Filing <u>Rebuttal</u> - ITC Over-Collection, Cost of Removal Deferred Tax Amortization, State Flow-Through <u>Surrebuttal</u> – Unamortized Balance of Joplin Tornado, ITC Over-Collections, Cost of Removal Deferred Tax Amortization, State Flow-Through, Transmission Revenues and Expenses	Settled
Brandco Investments/Hillcrest Utility Operating Company, Inc.	WO-2014-0340	<u>Rebuttal</u> – Rate Base and Future Rates	Settled
Lake Region Water & Sewer	WR-2013-0461	<u>Direct</u> – Overview of Staff’s Filing <u>Report on Cost of Service</u> – True-Up, Availability Fees, Sewer Operating Expense, Sewer Equipment Maintenance Expense <u>Surrebuttal</u> – Availability Fees <u>True-Up Direct</u> – Overview of True-Up Audit <u>True-Up Rebuttal</u> – Corrections to True-Up	Contested

<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<u>Contested or Settled</u>
Empire District Electric Company	ER-2012-0345	<p><u>Direct</u>- Overview of Staff's Filing <u>Report on Cost of Service</u>- SWPA Hydro Reimbursement, Joplin Tornado AAO Asset, SPP Revenues, SPP Expenses, Regulatory Plan Amortization Impacts, SWPA Amortization, Tornado AAO Amortization <u>Rebuttal</u>- Unamortized Balance of Joplin Tornado AAO, Rate Case Expense, True-Up and Uncontested Issues <u>Surrebuttal</u>- Unamortized Balance of Joplin Tornado AAO, SPP Transmission Expense, True-Up, Advanced Coal Investment Tax Credit</p>	Settled
Missouri-American Water Company	WR-2011-0337	<p><u>Direct</u>- Overview of Staff's Filing <u>Report on Cost of Service</u>- True-Up Recommendation, Tank Painting Tracker, Tank Painting Expense <u>Rebuttal</u>- Tank Painting Expense, Business Transformation <u>Surrebuttal</u>- Tank Painting Tracker, Acquisition Adjustment</p>	Settled
Missouri-American Water Company	WR-2010-0131	<p><u>Report on Cost of Service</u>- Pension/OPEB Tracker, Tank Painting Tracker, Deferred Income Taxes, FAS 87 Pension Costs, FAS 106 – Other Post-Employment Benefits, Incentive Compensation, Group Insurance and 401(k) Employer Costs, Tank Painting Expense, Dues and Donations, Advertising Expense, Promotional Items, Current and Deferred Income Tax Expense</p>	Settled
Empire District Gas Company	GR-2009-0434	<p><u>Report on Cost of Service</u>- Prepaid Pension Asset, Pension Tracker Asset/Liability, Unamortized Accounting Authority Order Balances, Pension Expense, OPEBs, Amortization of Stock Issuance Costs, Amortization of Accounting Authority Orders <u>Direct</u>- Overview of Staff's Filing</p>	Settled
Laclede Gas Company	GT-2009-0056	<p><u>Surrebuttal Testimony</u>- Tariff</p>	Contested

<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<u>Contested or Settled</u>
Missouri-American Water Company	WR-2008-0311 & SR-2008-0312	<u>Report on Cost of Service</u> – Tank Painting Tracker, Lobbying Costs, PSC Assessment <u>Direct</u> – Overview of Staff’s Filing <u>Rebuttal</u> – True-Up Items, Unamortized Balance of Security AAO, Tank Painting Expense, Fire Hydrant Painting Expense <u>Surrebuttal</u> – Unamortized Balance of Security AAO, Cedar Hill Waste Water Plant, Tank Painting Expense, Fire Hydrant Painting Expense	Settled
Missouri Gas Utility, Inc.	GR-2008-0060	<u>Report on Cost of Service</u> – Plant-in Service/Capitalization Policy, Plant-in Service/Purchase Price Valuation, Depreciation Reserve, Revenues, Uncollectible Expense	Settled
Laclede Gas Company	GR-2007-0208	<u>Direct</u> - Test Year and True-Up, Environmental costs, AAOs, Revenue, Miscellaneous Revenue, Gross receipts Tax, Gas Costs, Uncollectibles, EWCR, AMR, Acquisition Adjustment	Settled
Kansas City Power and Light Company	ER-2006-0314	<u>Direct</u> - Gross Receipts Tax, Revenues, Weather Normalization, Customer Growth/Loss Annualization, Large Customer Annualization, Other Revenue, Uncollectible (Bad Debt) Expense, Payroll, A&G Salaries Capitalization Ratio, Payroll Taxes, Employer 401 (k) Match, Other Employee Benefits <u>Surrebuttal</u> - Uncollectible (Bad Debt) Expense, Payroll, A&G Salaries Capitalization Ratio, Other Employee Benefits	Contested
Missouri Gas Energy	GR-2006-0204	<u>Direct</u> - Payroll, Incentive Compensation, Payroll Taxes, Employee Benefits, Lobbying, Customer & Governmental Relations Department, Collections Contract	Settled

<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<u>Contested or Settled</u>
Missouri Gas Energy	GU-2005-0095	<u>Rebuttal</u> - Accounting Authority Order <u>Surrebuttal</u> - Accounting Authority Order	Contested
The Empire District Electric Company	ER-2004-0570	<u>Direct</u> - Payroll	Settled
Missouri American Water Company & Cedar Hill Utility Company	SM-2004-0275	<u>Direct</u> - Acquisition Premium	Settled
Missouri Gas Energy	GR-2004-0209	<u>Direct</u> - Safety Line Replacement Program; Environmental Response Fund; Dues & Donations; Payroll; Customer & Governmental Relations Department Disallowance; Outside Lobbyist Costs <u>Rebuttal</u> - Customer Service; Incentive Compensation; Environmental Response Fund; Lobbying/Legislative Costs <u>True-Up</u> - Rate Case Expense	Contested
Osage Water Company	ST-2003-0562 / WT-2003-0563	<u>Direct</u> - Payroll <u>Rebuttal</u> - Payroll; Lease Payments to Affiliated Company; alleged Legal Requirement of a Reserve	Case Dismissed
Missouri American Water Company	WR-2003-0500	<u>Direct</u> - Acquisition Adjustment; Water Treatment Plant Excess Capacity; Retired Treatment Plan; Affiliated Transactions; Security AAO; Advertising Expense; Customer Correspondence	Settled
Empire District Electric	ER-2002-424	<u>Direct</u> - Dues & Donations; Memberships; Payroll; Security Costs <u>Rebuttal</u> - Energy Traders' Commission <u>Surrebuttal</u> - Energy Traders' Commission	Settled

<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<u>Contested or Settled</u>
Laclede Gas Company	GR-2002-356	<u>Direct</u> - Advertising Expense; Safety Replacement Program and the Copper Service Replacement Program; Dues & Donations; Rate Case Expense <u>Rebuttal</u> - Gas Safety Replacement Program / Deferred Income Taxes for AAOs	Settled
Missouri-American Water Company	WO-2002-273	<u>Rebuttal</u> - Accounting Authority Order <u>Cross-Surrebuttal</u> - Accounting Authority Order	Contested
Environmental Utilities	WA-2002-65	<u>Direct</u> - Water Supply Agreement <u>Rebuttal</u> - Certificate of Convenience & Necessity	Contested
Warren County Water & Sewer	WC-2002-160 / SC-2002-155	<u>Direct</u> - Clean Water Act Violations; DNR Violations; Customer Service; Water Storage Tank; Financial Ability; Management Issues <u>Surrebuttal</u> - Customer Complaints; Poor Management Decisions; Commingling of Regulated & Non-Related Business	Contested
Laclede Gas Company	GR-2001-629	<u>Direct</u> - Advertising Expense; Safety Replacement Program; Dues & Donations; Customer Correspondence	Settled
Gateway Pipeline Company	GM-2001-585	<u>Rebuttal</u> - Acquisition Adjustment; Affiliated Transactions; Company's Strategic Plan	Contested
Empire District Electric	ER-2001-299	<u>Direct</u> - Payroll; Merger Expense <u>Rebuttal</u> - Payroll <u>Surrebuttal</u> - Payroll	Settled
Osage Water Company	SR-2000-556/ WR-2000-557	<u>Direct</u> - Customer Service	Contested
St. Louis County Water Company	WR-2000-844	<u>Direct</u> - Main Incident Expense	Settled

<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<u>Contested or Settled</u>
Missouri American Water Company	WR-2000-281/ SR-2000-282	<u>Direct</u> - Water Plant Premature Retirement; Rate Case Expense <u>Rebuttal</u> - Water Plant Premature Retirement <u>Surrebuttal</u> - Water Plant Premature Retirement	Contested
Laclede Gas Company	GR-99-315	<u>Direct</u> - Advertising Expense; Dues & Donations; Miscellaneous Expense; Items to be Trued-up	Contested
St. Joseph Light & Power	HR-99-245	<u>Direct</u> - Advertising Expense; Dues & Donations; Miscellaneous Expense; Items to be Trued-up <u>Rebuttal</u> - Advertising Expense <u>Surrebuttal</u> - Advertising Expense	Settled
St. Joseph Light & Power	ER-99-247	<u>Direct</u> - Merger Expense; Rate Case Expense; Deferral of the Automatic Mapping/Facility Management Costs <u>Rebuttal</u> - Merger Expense; Rate Case Expense; Deferral of the Automatic Mapping/Facility Management Costs <u>Surrebuttal</u> - Merger Expense; Rate Case Expense; Deferral of the Automatic Mapping/Facility Management Costs	Settled
Laclede Gas Company	GR-98-374	<u>Direct</u> - Advertising Expense; Gas Safety Replacement AAO; Computer System Replacement Costs	Settled
Missouri Gas Energy	GR-98-140	<u>Direct</u> - Payroll; Advertising; Dues & Donations; Regulatory Commission Expense; Rate Case Expense	Contested
Gascony Water Company, Inc.	WA-97-510	<u>Rebuttal</u> - Rate Base; Rate Case Expense; Cash Working Capital	Settled
Union Electric Company	GR-97-393	<u>Direct</u> - Interest Rates for Customer Deposits	Settled
St. Louis County Water Company	WR-97-382	<u>Direct</u> - Interest Rates for Customer Deposits, Main Incident Expense	Settled

<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<u>Contested or Settled</u>
Associated Natural Gas Company	GR-97-272	<u>Direct</u> - Acquisition Adjustment; Interest Rates for Customer Deposits <u>Rebuttal</u> - Acquisition Adjustment; Interest Rates for Customer Deposits <u>Surrebuttal</u> - Interest Rates for Customer Deposits	Contested
Missouri-American Water Company	WA-97-45	<u>Rebuttal</u> - Waiver of Service Connection Charges	Contested
Imperial Utility Corporation	SC-96-427	<u>Direct</u> - Revenues, CIAC <u>Surrebuttal</u> - Payroll; Uncollectible Accounts Expense; Rate Case Expense, Revenues	Settled
St. Louis Water Company	WR-96-263	<u>Direct</u> -Main Incident Repairs <u>Rebuttal</u> - Main Incident Repairs <u>Surrebuttal</u> - Main Incident Repairs	Contested
Steelville Telephone Company	TR-96-123	<u>Direct</u> - Depreciation Reserve Deficiency	Settled
Missouri-American Water Company	WR-95-205/ SR-95-206	<u>Direct</u> - Property Held for Future Use; Premature Retirement of Sewer Plant; Depreciation Study Expense; Deferred Maintenance <u>Rebuttal</u> - Property Held for Future Use; Premature Retirement of Sewer Plant; Deferred Maintenance <u>Surrebuttal</u> - Property Held for Future Use; Premature Retirement of Sewer Plant	Contested
St. Louis County Water Company	WR-95-145	<u>Rebuttal</u> - Tank Painting Reserve Account; Main Repair Reserve Account <u>Surrebuttal</u> - Main Repair Reserve Account	Contested
Confluence Rivers	WR-2023-0006	<u>Direct</u> – Income Taxes <u>Surrebuttal</u> – Income Taxes	Contested

Francisco Del Pozo

Education

- 2007 M. S., Agricultural Economics, Kansas State University, Manhattan.
- 2007 B.S., Forestry Engineering, Summa Cum Laude, La Molina National Agricultural University, Lima, Peru.

Professional Experience

- 2022 - Regulatory Economist, Missouri Public Service Commission
- 2019- Technical Advisor, AVCON Industries, Newton, Kansas.
- 2009-2017 Agricultural Economist, United States Department of Agriculture (Foreign Agricultural Service and Risk Management Agency), Washington DC and Kansas City, MO.
- 2007 – 2009 Congressional Hunger Fellow, United Nations Food and Agriculture Organization, Rome, Italy
- 2006 Economic Research Service of the United States Department of Agriculture (USDA), Summer Fellowship Program
- 2003-2006 Graduate Teaching/Research Assistant, Kansas State University
- 1997-2002 Program Manager, National Project on Watershed Management and Soil Conservation. Lima, Peru.
- 1996 Research Assistant, ADEFOR- Forestry Research Center. Cajamarca, Peru.

Recent Case Summary

Case Number	Company	Issues
ER-2025-0168	Ameren Missouri	MEEIA- Rider EEIC
ER-2024-0261	Liberty Utilities	Electric Rate case
ER-2024-0189	Evergy Missouri West	Electric Rate case
GA-2023-0441	Spire Missouri	CCN Case
GA-2023-0374	Spire Missouri	CCN Case
GO-2024-0180	Missouri American Water	Carbon Offset Innit. Case
GA--2024-0100	Spire Missouri	CCN Case

Case Number	Company	Issues
GE-2023-0393	Spire Missouri	Tariff Rule Variation
GA-2023-0110	Spire Missouri	CCN
GR-2023-0038	Spire Missouri	C&I Custom Rebate Program
ER-2022-0337	Ameren Missouri	Electric Tariffs to Adjust to Revenues
GR-2021-0320	Liberty Utilities	Gas Rate Case
ER-2022-0129	Evergy Missouri Metro	Electric Rate Case

Expert Professional Presentations and Publications

- Foreign Agricultural Service (USDA), Washington, DC July 2012
In the Matter of USDA review of proposals for several free trade agreements tariff lines, developed and presented results scenarios of the tariff rate quotas using computational econometric methods in Both English and Spanish languages during high level trade negotiation meetings with foreign government representatives from Panama, Colombia and CAFTA-DR groups.
- United Nations Food and Agriculture Organization, Rome, Italy (FAO) June 2009
In the Matter of the policy analysis to prevent trade disruptions during due to increase of agricultural commodities, presented a research on the linking trade barriers imposed by countries in the Western Hemisphere based on the case of Argentina's move to restrict agricultural exports during the 2008 food price crisis causing distortions on prices paid to local agricultural producers with the matrix serving as a key tool for the Regional Office for the Latin America and Caribbean Office of FAO.
- Agricultural Economics Department, Kansas State University. May 2007
Size of Entry in Food Economy Firms in the United States between 1977 to 1992," M.S. Thesis, Manhattan, Kansas.
- Forestry Department, La Molina National Agricultural University. June 1997
Determination of coefficient of sawing of plantations of Pinus in the Andean region

Donald A. Fontana, PE

Current Position:

I am a Senior Professional Engineer in the Engineering Analysis Department – Industry Analysis Division of the Missouri Public Service Commission.

Educational Background and Work Experience:

I received a Bachelor of Science degree in Civil Engineering from the University of Missouri – Columbia in 1998.

I was employed as a consultant Designer (Engineer-In-Training) by Central Missouri Professional Services from June 1998 through May 2003. My primary job duties were design of sanitary sewer mains and on-site treatment systems; commercial site plan design; County road upgrade design (all under Professional Engineer supervision); and, easement description writing and review; ALTA survey drafting and description writing; subdivision drafting and legal description writing; and, Land Survey drafting and legal description writing (all under Registered Surveyor supervision).

I was next employed as a Design Engineer and Project Manager by the Missouri Department of Conservation from May 2003 to March 2007. I obtained licensure in Missouri as a Professional Engineer in 2004 (License Number 2004017168). My primary job duties were design of warm-water fish hatchery and cold-water fish hatchery upgrades; design of boat ramps; design of sanitary sewer systems for Regional Office buildings; and, project management.

I was next employed by the City of Jefferson City, Missouri – Department of Public Works from March 2007 to November 2024, as the City’s Stormwater Engineer and Floodplain Administrator. My primary job duties were stormwater system design and some project management; management of all Storm Water Management Program Plan components for compliance with the City’s Municipal Separate Stormwater System (MS4) permit which was mandated by the USEPA and administered by the Missouri Department of Natural Resources (MDNR); managed and maintained compliance with the City’s MDNR Land Disturbance permit; managed and maintained compliance with the Jefferson City Regional Airport’s MDNR General Discharge permit; managed all aspects of the City’s Floodplain Development program and maintained compliance with the National Flood Insurance Program (NFIP) participating community requirements; including, Floodplain Development permit application review; Floodplain Development permit approval / denial; City Flood Code enforcement; and assisted with Plan Review pertaining to the City’s MS4 permit, MDNR Land Disturbance permit, and Floodplain Development program compliance. Other duties involved fielding and responding to stormwater, flooding, and, erosion complaints from the public, and working with them to achieve a solution that was satisfactory to them.

I have been employed as a staff member with the Missouri Public Service Commission from December 2024 through the present (currently April 2025). To date, I have provided no testimony before the Missouri Public Service Commission.

CREDENTIALS AND CASE PARTICIPATION OF
SHAWN E. LANGE, PE

PRESENT POSITION:

I am a Professional Engineer in the Engineering Analysis Department, Industry Analysis Division, of the Missouri Public Service Commission.

EDUCATIONAL BACKGROUND AND WORK EXPERIENCE:

In December 2002, I received a Bachelor of Science Degree in Mechanical Engineering from the University of Missouri, at Rolla now known as the Missouri University of Science and Technology. I joined the Commission Staff in January 2005. I am a registered Professional Engineer in the State of Missouri and my license number is 2018000230.

TESTIMONY FILED:

Case Number	Utility	Testimony	Issue
ER-2005-0436	Aquila Inc.	Direct	Weather Normalization
		Rebuttal	Weather Normalization
		Surrebuttal	Weather Normalization
ER-2006-0314	Kansas City Power & Light Company	Direct	Weather Normalization
		Rebuttal	Weather Normalization
ER-2006-0315	Empire District Electric Company	Direct	Weather Normalization
		Surrebuttal	Weather Normalization
ER-2007-0002	Union Electric Company d/b/a AmerenUE	Direct	Weather Normalization
ER-2007-0004	Aquila Inc.	Direct	Weather Normalization
ER-2007-0291	Kansas City Power & Light Company	Staff Report	Weather Normalization
		Rebuttal	Weather Normalization
ER-2008-0093	Empire District Electric Company	Staff Report	Weather Normalization
ER-2008-0318	Union Electric Company d/b/a AmerenUE	Staff Report	Weather Normalization

Case Number	Utility	Testimony	Issue
ER-2009-0089	Kansas City Power & Light Company	Staff Report	Net System Input
ER-2009-0090	KCP&L Greater Missouri Operations Company	Staff Report	Net System Input
ER-2010-0036	Union Electric Company d/b/a AmerenUE	Staff Report	Net System Input
ER-2010-0130	Empire District Electric Company	Staff Report	Variable Fuel Costs
		Surrebuttal	Variable Fuel Costs
ER-2010-0355	Kansas City Power & Light Company	Staff Report	Variable Fuel Costs
ER-2010-0356	KCP&L Greater Missouri Operations Company	Staff Report	Engineering Review-Sibley 3 SCR
ER-2011-0004	Empire District Electric Company	Staff Report	Variable Fuel Costs
ER-2011-0028	Union Electric Company d/b/a Ameren Missouri	Staff Report	Net System Input
ER-2012-0166	Union Electric Company d/b/a Ameren Missouri	Staff Report	Weather Normalization
		Surrebuttal	Weather Normalization Maryland Heights In-Service
ER-2012-0174	Kansas City Power & Light Company	Staff Report	Weather Normalization Net System Input Variable Fuel Costs
		Surrebuttal	Weather Normalization
ER-2012-0175	KCP&L Greater Missouri Operations Company	Staff Report	Weather Normalization Net System Input
		Surrebuttal	Weather Normalization
ER-2012-0345	Empire District Electric Company	Rebuttal	Interim Rates
		Staff Report	Weather Normalization
EC-2014-0223	Noranda Aluminum v. Ameren Missouri	Rebuttal	Weather Normalization
EA-2014-0207	Grain Belt Express CCN	Rebuttal	Certificates of Convenience/Feasibility Analysis
		Surrebuttal	

Case Number	Utility	Testimony	Issue
ER-2014-0258	Union Electric Company d/b/a Ameren Missouri	Staff Report	Net System Input Variable Fuel Costs
ER-2014-0351	Empire District Electric Company	Staff Report	Net System Input Variable Fuel Costs
ER-2014-0370	Kansas City Power & Light Company	Staff Report	Net System Input Variable Fuel Costs
		True-up Direct	Variable Fuel Costs La Cygne In-service
EA-2015-0146	ATXI CCN	Rebuttal	Certificates of Convenience/Feasibility Analysis
		Surrebuttal	
ER-2016-0023	Empire District Electric Company	Staff Report	Net System Input Variable Fuel Costs
		Surrebuttal	Variable Fuel Costs
ER-2016-0179	Union Electric Company d/b/a Ameren Missouri	Staff Report	Variable Fuel Costs
EA-2016-0385	Grain Belt Express CCN	Rebuttal	Certificates of Convenience/Feasibility Analysis
		Surrebuttal	
ER-2018-0145	Kansas City Power & Light Company	Staff Report	Variable Fuel Costs Market Prices
		Rebuttal	Variable Fuel Costs Market Prices
		True-up Direct	Variable Fuel Costs Market Prices
EA-2018-0327	ATXI CCN	Rebuttal	Certificates of Convenience/Feasibility Analysis
EA-2019-0021	Ameren CCN	Staff Report	Certificates of Convenience/Feasibility Analysis
EA-2019-0010	Empire District Electric Company CCN	Staff Report	Certificates of Convenience/Feasibility Analysis
EC-2020-0408	MLA v. Grain Belt Complaint	Staff Recommendation	Formal Complaint
EA-2021-0167	ATXI CCN	Staff Recommendation	Certificates of Convenience/Feasibility Analysis

Case Number	Utility	Testimony	Issue
EA-2021-0087	ATXI CCN	Staff Report	Certificates of Convenience/Feasibility Analysis
ER-2021-0240	Union Electric Company d/b/a Ameren Missouri	Staff Report	Variable Fuel Costs Atchison wind farm Construction Audit and in-service review
		Rebuttal	Atchison in-service and Variable Fuel Costs
		True-up Direct	Variable Fuel Costs
ER-2021-0312	Empire District Electric Company	Staff Report	Transmission and Distribution Investment
EA-2022-0043	Every Metro and Every West Hawthorn Solar CCN	Staff Report	Certificates of Convenience/Feasibility Analysis
EA-2022-0099	ATXI CCN	Staff Direct Testimony	Certificates of Convenience/Feasibility Analysis
EA-2022-0244	Union Electric Company d/b/a Ameren Missouri	Staff Report	Certificates of Convenience/Feasibility Analysis
EA-2022-0245	Union Electric Company d/b/a Ameren Missouri	Staff Rebuttal Testimony	Certificates of Convenience/Feasibility Analysis
ER-2022-0337	Union Electric Company d/b/a Ameren Missouri	Direct Testimony	Variable fuel Costs
		Rebuttal Testimony	Variable fuel Costs
		Surrebuttal/True-up Direct	Variable fuel Costs
		True-up Rebuttal	Variable fuel Costs
EA-2022-0328	Every West	Staff Rebuttal Testimony	Certificates of Convenience/Feasibility Analysis
EA-2023-0017	GrainBelt Express	Staff Rebuttal Testimony	Certificates of Convenience/Feasibility Analysis

Case Number	Utility	Testimony	Issue
EA-2023-0226	Ameren Missouri	Staff Memo	Certificates of Convenience/Feasibility Analysis
ET-2023-0249	Ameren Missouri	Staff Memo	Cogeneration and Net Metering rate
EA-2024-0286	Ameren Missouri	Rebuttal Testimony	Certificates of Convenience/Feasibility Analysis
EF-2024-0021	Ameren Missouri	Rebuttal	Financing Order Authorizing the Issue of Securitized Utility Tariff Bonds
ER-2024-0189	Evergy Missouri West	Rebuttal	Variable Fuel Cost
EA-2024-0237	Ameren Missouri	Staff Memo/Report	Certificates of Convenience/Feasibility Analysis
ER-2024-0319	Ameren Missouri	Staff Direct	Variable Fuel Costs
		Staff True-up Direct	Variable Fuel Cost
EA-2024-0302	ATXI	Staff Memo/Report	Certificates of Convenience/Feasibility Analysis
EA-2024-0292	Evergy Missouri West	Staff Memo/Report	Certificates of Convenience/Feasibility Analysis

**Case Participation of
J Luebbert**

Case Number	Company	Issues
EO-2015-0055	Ameren Missouri	Evaluation, Measurement, and Verification
EO-2016-0223	Empire District Electric Company	Integrated Resource Planning Requirements
EO-2016-0228	Ameren Missouri	Utilization of Generation Capacity, Plant Outages, and Demand Response Program
ER-2016-0179	Ameren Missouri	Heat Rate Testing
ER-2016-0285	Kansas City Power & Light Company	Heat Rate Testing
EO-2017-0065	Empire District Electric Company	Utilization of Generation Capacity and Station Outages
EO-2017-0231	Kansas City Power & Light Company	Utilization of Generation Capacity, Heat Rates, and Plant Outages
EO-2017-0232	KCP&L Greater Missouri Operations Company	Utilization of Generation Capacity, Heat Rates, and Plant Outages
EO-2018-0038	Ameren Missouri	Integrated Resource Planning Requirements
EO-2018-0067	Ameren Missouri	Utilization of Generation Capacity, Heat Rates, and Plant Outages
EO-2018-0211	Ameren Missouri	Avoided Costs and Demand Response Programs
EA-2019-0010	Empire District Electric Company	Market Protection Provision
GO-2019-0115	Spire East	Policy
GO-2019-0116	Spire West	Policy
EO-2019-0132	Kansas City Power & Light Company	Avoided Cost, SPP resource adequacy requirements, and Demand Response Programs
ER-2019-0335	Ameren Missouri	Unregulated Competition Waivers and Class Cost Of Service
ER-2019-0374	Empire District Electric Company	SPP resource adequacy
EO-2020-0227	Evergy Missouri Metro	Demand Response programs
EO-2020-0228	Evergy Missouri West	Demand Response programs
EO-2020-0262	Evergy Missouri Metro	Demand Response programs
EO-2020-0263	Evergy Missouri West	Demand Response programs
EO-2020-0280	Evergy Missouri Metro	Integrated Resource Planning Requirements

Case Number	Company	Issues
EO-2020-0281	Evergy Missouri West	Integrated Resource Planning Requirements
EO-2021-0021	Ameren Missouri	Integrated Resource Planning Requirements
EO-2021-0032	Evergy	Renewable Generation and Retirements
GR-2021-0108	Spire Missouri	Metering and Combined Heat and Power
ET-2021-0151	Evergy	Capacity costs
ER-2021-0240	Ameren Missouri	Market Prices, Construction Audit, Smart Energy Plan, AMI
ER-2021-0312	Empire District Electric Company	Construction Audit, Market Price Protection, PISA Reporting
EO-2022-0193	Empire District Electric Company	Retirement of Asbury
ER-2022-0129	Evergy Missouri Metro	MEEIA annualization
ER-2022-0130	Evergy Missouri West	MEEIA annualization, Schedule SIL revenue and incremental costs
EF-2022-0155	Evergy Missouri West	Customer event balancing
EC-2022-0315	Evergy Missouri West	Compliance with Stipulation and Agreement, Commission Order, and Schedule SIL
GR-2022-0179	Spire Missouri	Compressed Natural Gas
EA-2022-0244	Ameren Missouri	Huck Finn Solar CCN
EA-2022-0245	Ameren Missouri	Boomtown Solar CCN
EA-2022-0328	Evergy Missouri West	Persimmon Creek CCN
ER-2022-0337	Ameren Missouri	Billing determinant adjustments
EA-2023-0286	Ameren Missouri	Solar CCNs
EO-2024-0002	Evergy Missouri West Evergy Missouri Metro	Data retention
EO-2023-0136	Ameren Missouri	MEEIA program design, avoided costs
EO-2023-0369 EO-2023-0370	Evergy Missouri Metro Evergy Missouri West	MEEIA program design, tariffs
EA-2024-0237	Ameren Missouri	Economic Feasibility
EA-2024-0292	Evergy Missouri West	Economic Feasibility and Decisional Prudence

CREDENTIALS AND CASE PARTICIPATION OF **BRODRICK NIEMEIER**

Present Position:

I am an Associate Engineer in the Engineering Analysis Department, Industry Analysis Division, of the Missouri Public Service Commission.

Educational Background and Work Experience:

In December 2021, I received a Bachelor of Science Degree in Chemical Engineering from Missouri University of Science and Technology. I joined the Commission Staff in March 2022.

Testimony Filed:

Case Number	Utility	Testimony	Issue
GE-2018-0193	Summit Natural Gas of Missouri	Staff Report	Meter Inspections
EA-2022-0244	Ameren Missouri	Rebuttal	Qualifications and Report Requirements
EO-2022-0320	Evergy Missouri West	Staff Report	Change of Provider
WA-2022-0361	Missouri American Water Company	Staff Report	Depreciation
WA-2023-0026	Confluence Rivers	Staff Report	Depreciation
WA-2023-0071	Missouri American Water Company	Staff Report	Depreciation
EO-2023-0105	Evergy Missouri West	Staff Report	Change of Provider
GE-2023-0196	Liberty (Empire) Gas	Staff Report	Meter Inspections
GE-2023-0354	Spire Missouri	Staff Report	Meter Inspections
EO-2024-0035	Evergy Missouri West	Staff Report	Change of Provider
EO-2024-0142	Evergy Missouri West	Staff Report	Change of Provider
EO-2024-0161	Evergy Missouri West	Staff Report	Change of Provider

Case Number	Utility	Testimony	Issue
EA-2023-0131	Liberty (Empire) Electric	Staff Report	Application Requirements, Qualifications, Maintenance and Forced Outages, and Operating Plans
ER-2024-0189	Evergy Missouri West	Direct, Rebuttal, True-up	Fuel and Purchased Power Cost
GE-2024-0345	Summit Natural Gas of Missouri	Staff Report	Meter Inspections
EA-2024-0237	Ameren Missouri	Staff Report	Application Requirements
ER-2024-0319	Ameren Missouri	Direct, True-up	Solar In-service Criteria
EO-2025-0223	Liberty (Empire) Electric	Report	Territorial Agreement

David M. Sommerer

Educational Background and Work Experience

In May 1983, I received a Bachelor of Science degree in Business and Administration with a major in Accounting from Southern Illinois University at Carbondale, Illinois. In May 1984, I received a Master of Accountancy degree from the same university. Also, in May 1984, I sat for and passed the Uniform Certified Public Accountants examination. I am currently a licensed CPA in Missouri. Upon graduation, I accepted employment with the Commission.

From 1984 to 1990 I assisted with audits and examinations of the books and records of public utilities operating within the state of Missouri. In 1988, the responsibility for conducting the Actual Cost Adjustment (ACA) audits of natural gas utilities was given to the Accounting Department. I assumed responsibility for planning and implementing these audits and trained available Staff on the requirements and conduct of the audits. I participated in most of the ACA audits from early 1988 to early 1990. On November 1, 1990, I transferred to the Commission's Energy Department. Until November of 1993, my duties consisted of reviews of various tariff proposals by electric and gas utilities, Purchased Gas Adjustment (PGA) reviews, and tariff reviews as part of a rate case. In November of 1993, I assumed my present duties of managing a newly created department called the Procurement Analysis Department. This Department was created to more fully address the emerging changes in the gas industry especially as they impacted the utilities' recovery of gas costs. My duties have included managing the Procurement Analysis staff, reviewing ACA audits and recommendations, participating in the gas integrated resource planning project, serving on the gas project team, serving on the natural gas commodity price task force, and participating in matters relating to natural gas service in the state of Missouri. In July of 2006, the Federal Issues/Policy Analysis Section was transferred to the Procurement Analysis Department. That group analyzes filings made before the Federal Energy Regulatory Commission (FERC). During the reorganization in August 2011, the Federal Issues/Policy Analysis Section was transferred to the Secretary/ General Counsel Division. In 2015, I assumed the responsibility for the rate design aspects of the Gas Infrastructure System Replacement Surcharge (ISRS) process. The Gas ISRS allows for a more expedited process of including eligible pipeline replacements in rates prior to general rate cases. In April of 2021, I participated in the development of Staff's Report in the Cold Weather Event Investigation Case No. AO-2021-0264.

**CASES WHERE TESTIMONY
WAS FILED
DAVID M. SOMMERER**

COMPANY	CASE NO.	ISSUES
Spire Inc.	GC-2024-0172	Customer Complaint
Spire West	GR-2022-0136	Off-system Sales
Summit Natural Gas of Missouri	GR-2022-0122	PGA/ACA Carrying Costs
Summit Natural Gas of Missouri	GC-2022-0158	Ozark Healthcare Complaint
Spire East/West	GR-2021-0108	PGA/ACA Consolidation, Seasonal PGA
Spire East	GO-2019-0356	ISRS rates
Spire West	GO-2019-0357	ISRS rates
Spire East	GO-2019-0115	ISRS rates
Spire West	GO-2019-0116	ISRS rates
Spire East	GO-2018-0309	ISRS rates
Spire West	GO-2018-0310	ISRS rates
Missouri Gas Energy	GO-2017-0201	ISRS rates
Laclede Gas Company	GO-2017-0202	ISRS rates
Missouri Gas Energy	GR-2017-0216	Gas Inventory Carrying Cost and Service Agreements
Laclede Gas Company	GR-2017-0215	Gas Inventory Carrying Cost and Service Agreements
Laclede Gas Company	GO-2016-0333	ISRS rates
Missouri Gas Energy	GO-2016-0332	ISRS rates
Laclede Gas Company (MGE)	GO-2016-0197	ISRS rates

COMPANY	CASE NO.	ISSUES
Laclede Gas Company	GO-2016-0196	ISRS rates
Liberty Utilities (Midstates Natural Gas) Corp., d/b/a Liberty Utilities	GR-2014-0152	Special Contact Customers Gas Contract
Missouri Gas Energy	GR-2014-0007	Gas Supply Incentive Plan Property Tax PGA Recovery
Laclede Gas Company	GR-2010-0171	Bad Debt in PGA, CAM
Atmos Energy Corporation	GR-2009-0417	Affiliated Transactions
Atmos Energy Corporation	GR-2008-0364	Affiliated Transactions
Missouri Gas Energy	GR-2009-0355	PGA tariff
Laclede Gas Company	GT-2009-0026	Tariff Proposal, ACA Process
Missouri Gas Utility	GR-2008-0060	Carrying Costs
Laclede Gas Company	GR-2007-0208	Gas Supply Incentive Plan, Off-system Sales, Capacity Release
Laclede Gas Company	GR-2005-0284	Off-System Sales/GSIP
Laclede Gas Company	GR-2004-0273	Demand Charges
AmerenUE	EO-2004-0108	Transfer of Gas Services
Aquila, Inc.	EF-2003-0465	PGA Process, Deferred Gas Cost
Missouri Gas Energy	GM-2003-0238	Pipeline Discounts, Gas Supply
Laclede Gas Company	GT-2003-0117	Low-Income Program
Laclede Gas Company	GR-2002-356	Inventory, Off-System Sales
Laclede Gas Company	GR-2001-629	Inventory, Off-System Sales
Laclede Gas Company	GR-2001-387	ACA Price Stabilization
Missouri Gas Energy	GR-2001-382	ACA Hedging/Capacity Release

COMPANY	CASE NO.	ISSUES
Laclede Gas Company	GT-2001-329	Incentive Plan
Laclede Gas Company	GO-2000-394	Price Stabilization
Laclede Gas Company	GT-99-303	Incentive Plan
Laclede Gas Company	GC-99-121	Complaint PGA
Laclede Gas Company	GR-98-297	ACA Gas Cost
Laclede Gas Company	GO-98-484	Price Stabilization
Laclede Gas Company	GR-98-374	PGA Clause
Missouri Gas Energy	GC-98-335	Complaint Gas Costs
United Cities Gas Company	GO-97-410	PGA Clause
Missouri Gas Energy	GO-97-409	PGA Clause
Missouri Gas Energy	GR-96-450	ACA Gas Costs
Missouri Public Service	GA-95-216	Cost of Gas
Missouri Gas Energy	GO-94-318	Incentive Plan
Western Resources Inc.	GR-93-240	PGA tariff, Billing Adjustments
Union Electric Company	GR-93-106	ACA Gas Costs
United Cities Gas Company	GR-93-47	PGA tariff, Billing Adjustments
Laclede Gas Company	GR-92-165	PGA tariff
United Cities Gas Company	GR-91-249	PGA tariff
United Cities Gas Company	GR-90-233	PGA tariff
Associated Natural Gas Company	GR-90-152	Payroll
KPL Gas Service Company	GR-90-50	Service Line Replacement
KPL Gas Service Company	GR-90-16	ACA Gas Costs
KPL Gas Service Company	GR-89-48	ACA Gas Costs

COMPANY	CASE NO.	ISSUES
Great River Gas Company	GM-87-65	Lease Application
Grand River Mutual Tel. Company	TR-87-25	Plant, Revenues
Empire District Electric Company	WR-86-151	Revenues
Associated Natural Gas Company	GR-86-86	Revenues, Gas Cost
Grand River Mutual Telephone	TR-85-242	Cash Working Capital
Great River Gas Company	GR-85-136	Payroll, Working Capital
Missouri-American Water Company	WR-85-16	Payroll

Michael L. Stahlman

Education

- 2009 M. S., Agricultural Economics, University of Missouri, Columbia.
2007 B.A., Economics, Summa Cum Laude, Westminster College, Fulton, MO.

Professional Experience

- 2010 - Regulatory Economist, Missouri Public Service Commission
2007 – 2009 Graduate Research Assistant, University of Missouri
2008 Graduate Teaching Assistant, University of Missouri
2007 American Institute for Economic Research (AIER) Summer Fellowship Program
2006 Price Analysis Intern, Food and Agricultural Policy Research Institute (FAPRI), Columbia, MO
2006 Legislative Intern for State Representative Munzlinger
2005 – 2006 Certified Tutor in Macroeconomics, Westminster College, Fulton, MO
1998 – 2004 Engineering Watch Supervisor, United States Navy

Expert Witness Testimony

- Union Electric Company d/b/a AmerenUE GR-2010-0363
In the Matter of Union Electric Company d/b/a AmerenUE for Authority to File Tariffs Increasing Rates for Natural Gas Service Provided to Customers in the Company's Missouri Service Area
- Union Electric Company d/b/a Ameren Missouri GT-2011-0410
In the Matter of the Union Electric Company's (d/b/a Ameren Missouri) Gas Service Tariffs Removing Certain Provisions for Rebates from Its Missouri Energy Efficient Natural Gas Equipment and Building Shell Measure Rebate Program
- KCP&L Great Missouri Operations Company EO-2012-0009
In the Matter of KCP&L Greater Missouri Operations Company's Notice of Intent to File an Application for Authority to Establish a Demand-Side Programs Investment Mechanism
- Union Electric Company d/b/a Ameren Missouri EO-2012-0142
In the Matter of Union Electric Company d/b/a Ameren Missouri's Filing to Implement Regulatory Changes Furtherance of Energy Efficiency as Allowed by MEEIA
- Kansas City Power & Light Company EO-2012-0323
In the Matter of the Resource Plan of Kansas City Power & Light Company
- KCP&L Great Missouri Operations Company EO-2012-0324
In the Matter of the Resource Plan of KCP&L Greater Missouri Operations Company
- Kansas City Power & Light Company EO-2012-0135
KCP&L Great Missouri Operations Company EO-2012-0136
In the Matter of the Application of Kansas City Power & Light Company [KCP&L Great Missouri Operations Company] for Authority to Extend the Transfer of Functional Control of Certain Transmission Assets to the Southwest Power Pool, Inc.

Kansas City Power & Light Company, KCP&L Great Missouri Operations Company, and Transource Missouri	EA-2013-0098 EO-2012-0367
In the Matter of the Application of Transource Missouri, LLC for a Certificate of Convenience and Necessity Authorizing it to Construct, Finance, Own, Operate, and Maintain the Iatan-Nashua and Sibley-Nebraska City Electric Transmission Projects	
Kansas City Power & Light Company KCP&L Great Missouri Operations Company	EU-2014-0077
In the Matter of the Application of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company for the Issuance of an Accounting Authority Order relating to their Electrical Operations and for a Contingent Waiver of the Notice Requirement of 4 CSR 240-4.020(2)	
Kansas City Power & Light Company	EO-2014-0095
In the Matter of Kansas City Power & Light Company's Notice of Intent to File an Application for Authority To Establish a Demand-Side Programs Investment Mechanism	
Veolia Energy Kansas City, Inc	HR-2014-0066
In the Matter of Veolia Energy Kansas City, Inc for Authority to File Tariffs to Increase Rates	
Grain Belt Express Clean Line, LLC	EA-2014-0207
In the Matter of the Application of Grain Belt Express Clean Line LLC for a Certificate of Convenience and Necessity Authorizing It to Construct, Own, Operate, Control, Manage, and Maintain a High Voltage, Direct Current Transmission Line and an Associated Converter Station Providing an Interconnection on the Maywood - Montgomery 345 kV Transmission Line	
Union Electric Company d/b/a Ameren Missouri	ER-2014-0258
In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariff to Increase Its Revenues for Electric Service	
Empire District Electric Company	ER-2014-0351
In the Matter of The Empire District Electric Company for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Company's Missouri Service Area	
Kansas City Power & Light Company	ER-2014-0370
In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service	
Kansas City Power & Light Company	EO-2014-0240
In the Matter of Kansas City Power & Light Company's Filing for Approval of Demand-Side Programs and for Authority to Establish a Demand-Side Programs Investment Mechanism	
KCP&L Great Missouri Operations Company	EO-2014-0241
In the Matter of KCP&L Greater Missouri Operations Company's Filing for Approval of Demand-Side Programs and for Authority to Establish a Demand-Side Programs Investment Mechanism	

Ameren Transmission Company of Illinois In the Matter of the Application of Ameren Transmission Company of Illinois for Other Relief or, in the Alternative, a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Maintain and Otherwise Control and Manage a 345,000-volt Electric Transmission Line from Palmyra, Missouri to the Iowa Border and an Associated Substation Near Kirksville, Missouri	EA-2015-0146
Empire District Electric Company In the Matter of The Empire District Electric Company's Request for Authority to Implement a General Rate Increase for Electric Service	ER-2016-0023
KCP&L Great Missouri Operations Company In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement a General Rate Increase for Electric Service	ER-2016-0156
Kansas City Power & Light Company In the Matter of Kansas City Power & Light Company's Request for Authority to Implement A General Rate Increase for Electric Service	ER-2016-0285
Union Electric Company d/b/a Ameren Missouri In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariff to Increase Its Revenues for Electric Service	ER-2016-0179
Grain Belt Express Clean Line, LLC In the Matter of the Application of Grain Belt Express Clean Line LLC for a Certificate of Convenience and Necessity Authorizing it to Construct, Own, Operate, Control, Manage and Maintain a High Voltage, Direct Current Transmission Line and an Associated Converter Station Providing an Interconnection on the Maywood-Montgomery 345kV transmission line.	EA-2016-0358
Spire Missouri, Inc. In the Matter of Spire Missouri, Inc.'s Request to Increase Its Revenues for Gas Service	GR-2017-0215 and GR-2017-0216
Liberty Utilities In the Matter of Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities' Tariff Revisions Designed to Implement a General Rate Increase for Natural Gas Service in the Missouri Service Areas of the Company	GR-2018-0013
Spire Missouri, Inc. In the Matter of Spire Missouri, Inc. d/b/a Spire's Request to Decrease [Increase] WNAR	GO-2019-0058 and GO-2019-0059
Grain Belt Express Clean Line LLC Invenergy Transmission LLC Invenergy Investment Company LLC In the Matter of the Joint Application of Invenergy Transmission LLC, Invenergy Investment Company LLC, Grain Belt Express Clean Line LLC and Grain Belt Express Holding LLC for an Order Approving the Acquisition by Invenergy Transmission LLC of Grain Belt Express Clean Line LLC	EM-2019-0150
Union Electric Company d/b/a Ameren Missouri In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Increase its Revenues for Natural Gas Service	GR-2019-0077

Union Electric Company d/b/a Ameren Missouri In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Decrease Its Revenues for Electric Service	ER-2019-0335
Empire District Electric Company In the Matter of The Empire District Electric Company's Request for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in its Missouri Service Area	ER-2019-0374
Union Electric Company d/b/a Ameren Missouri In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and a Certificate of Public Convenience and Necessity Under 20 CSR 4240-3.105	EA-2020-0371
Spire Missouri, Inc. In the Matter of Spire Missouri Inc.'s d/b/a Spire Request for Authority to Implement a General Rate Increase for Natural Gas Service Provided in the Company's Missouri Service Areas	GR-2021-0108
Union Electric Company d/b/a Ameren Missouri In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service	ER-2021-0240
Union Electric Company d/b/a Ameren Missouri In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Natural Gas Service	GR-2021-0241
The Empire District Electric Company In the Matter of the Request of The Empire District Electric Company d/b/a Liberty for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in its Missouri Service Area	ER-2021-0312
The Empire District Gas Company In the Matter of The Empire District Gas Company's d/b/a Liberty Request to File Tariffs to Change its Rates for Natural Gas Service	GR-2021-0320
Ameren Transmission Company of Illinois In the Matter of the Application of Ameren Transmission Company of Illinois for a Certificate of Convenience and Necessity Under Section 393.170.1, RSMo. Relating to Transmission Investments in Southeast Missouri	EA-2022-0099
Evergy Metro, Inc d/b/a Evergy Missouri Metro In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's Request for Authority to Implement A General Rate Increase for Electric Service	ER-2022-0129
Evergy Missouri West, Inc. d/b/a Evergy Missouri West 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	ER-2022-0130

- Spire Missouri, Inc. GR-2022-0179
In the Matter of Spire Missouri, Inc. d/b/a Spire's Request for Authority to Implement a General Rate Increase for Natural Gas Service Provided in the Company's Missouri Service Areas
- Union Electric Company d/b/a Ameren Missouri EA-2022-0245
In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of a Subscription-Based Renewable Energy Program
- Union Electric Company d/b/a Ameren Missouri ER-2022-0337
In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service
- Grain Belt Express Clean Line LLC EA-2023-0017
In the Matter of the Application of Grain Belt Express LLC for an Amendment to its Certificate of Convenience and Necessity Authorizing it to Construct, Own, Operate, Control, Manage, and Maintain a High Voltage, Direct Current Transmission Line and Associated Converter Station
- Union Electric Company d/b/a Ameren Missouri EA-2023-0286
In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and Certificates of Public Convenience and Necessity Authorizing it to Construct Renewable Generation Facilities
- Evergy Metro, Inc d/b/a Evergy Missouri Metro EO-2024-0002
Evergy Missouri West, Inc. d/b/a Evergy Missouri West
In the Matter of Requests for Customer Account Data Production from Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West
- Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty GR-2024-0106
In the Matter of the Request of Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty to Implement a General Rate Increase for Natural Gas Service in the Missouri Service Areas of the Company
- Evergy Missouri West, Inc. d/b/a Evergy Missouri West ER-2024-0189
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
- Union Electric Company d/b/a Ameren Missouri ER-2024-0319
In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service
- Spire Missouri, Inc. GR-2025-0107
In the Matter of Spire Missouri Inc. d/b/a Spire's Request for Authority to Implement a General Rate Increase for Natural Gas Service Provided in the Company's Missouri Service Areas

Selected Manuscripts

Stahlman, Michael and Laura M.J. McCann. "Technology Characteristics, Choice Architecture and Farmer Knowledge: The Case of Phytase." *Agriculture and Human Values* (2012) 29: 371-379.

Stahlman, Michael. "The Amoral of Signals." Awarded in top 50 authors for SEVEN Fund essay competition, "The Morality of Profit."

CREDENTIALS AND CASE PARTICIPATION OF
JUSTIN TEVIE

Present Position:

I am an Economics Analyst in the Tariff/Rate Design Department, Industry Analysis Division, of the Missouri Public Service Commission.

Educational Background and Work Experience:

In 2013, I obtained a graduate degree in Economics from the University of New Mexico. In 2019, I joined the Missouri Department of Mental Health as a Research Analyst assisting with data analysis and federal reporting. Prior to that, I was a Forecast Analyst at Department of Social and Health Services in the State of Washington assisting with forensic caseload forecasting and reporting.

Case No.	Company	Testimony	Issue
ER-2022-0337	Ameren Missouri	Direct	Locational Market prices
		Rebuttal	
		True-up	
EO-2023-0136	Ameren Missouri	Direct	Savings shapes, program evaluation, EM & V, Principal-Agent problem, and employment
		Rebuttal	
		Surrebuttal	
ER-2023-0184	Evergy Missouri West	Staff Recommendation	MEEIA Cycle 3
ER-2023-0411	Evergy Missouri West	Staff Recommendation	MEEIA Cycle 3
EA-2023-0131	Empire	CCN	Economic feasibility
ER-2024-0186	Evergy Missouri West	Staff Recommendation	MEEIA Cycle 3

Case No.	Company	Testimony	Issue
ER-2024-0184	Evergy Missouri Metro	Staff Recommendation	MEEIA Cycle 3
ER-2023-0369	Evergy Missouri West	Direct	MEEIA Cycle 4 Savings shapes, program evaluation, EM & V, Principal- Agent problem
		Rebuttal	
ER-2023-0370	Evergy Missouri Metro	Direct	MEEIA Cycle 4 Savings shapes, program evaluation, EM & V, Principal- Agent problem
		Rebuttal	
ER-2024-0189	Evergy Missouri West	Direct	Special Incremental Load/NUCOR Locational Market Prices
		Rebuttal	
		Surrebuttal/True up	
		True-up rebuttal	
GR-2024-0106	Liberty MidStates Utilities	Direct	Transport Revenues
		Rebuttal	
		Surrebuttal	
ER-2024-0319	Ameren Missouri	Direct Testimony	Locational Market Prices
EA-2024-0292	Evergy Missouri West	Solar CCN	Economic Feasibility

Credentials and Background of

Seoung Joun Won, PhD

I am currently employed as a Regulatory Compliance Manager in the Financial Analysis Department of the Financial and Business Analysis Division of the Missouri Public Service Commission. I have been employed at the Missouri Public Service Commission since May 2010.

I received my Bachelor of Arts, Master of Arts, and Doctor of Philosophy in Mathematics from Yonsei University and my Bachelor of Business Administration in Financial Accounting from Seoul Digital University in Seoul, South Korea, and earned my Doctor of Philosophy in Economics from the University of Missouri - Columbia. Also, I passed several certificate examinations for Finance Specialist in South Korea such as Accounting Management, Financial Risk Manager, Enterprise Resource Planning Accounting Consultant, Derivatives Investment Advisor, Securities Investment Advisor, and Financial Planner.

Prior to joining the Commission, I taught both undergraduate and graduate level mathematics at the Korean Air Force Academy and Yonsei University for 13 years. I served as the director of the Education and Technology Research Center in NeoEdu for 5 years. Before starting my current position at the Missouri Public Service Commission, I had served as a regulatory economist in Tariff/Rate Design Department.

My current duties at the Commission include financial analysis of rate of return and cost of equity, valuation analysis on merger and acquisition, due diligence review and supporting economic and statistical analysis.

List of Previous Testimony Filed

Seoung Joun Won, PhD

<u>Case Number</u>	<u>Company</u>	<u>Issue</u>
GR-2025-0107	Spire Missouri, Inc. d/b/a Spire	Rate of Return, Capital Structure
EA-2024-0292	Evergy Missouri West, Inc. d/b/a Evergy Missouri West	Financial Capability
EA-2025-0028	Union Electric Co., d/b/a Ameren Missouri	Financial Capability
GA-2025-0181	Spire Missouri, Inc. d/b/a Spire	Financial Capability
GR-2024-0369	Union Electric Co., d/b/a Ameren Missouri	Rate of Return, Capital Structure
EA-2024-0302	Ameren Transmission Company of Illinois	Financial Capability
ER-2024-0319	Union Electric Co., d/b/a Ameren Missouri	Rate of Return, Capital Structure
GA-2024-0361	Spire Missouri, Inc. d/b/a Spire	Financial Capability
WM-2025-0017	Missouri-American Water Company	Merger and Acquisition
EA-2024-0237	Union Electric Co., d/b/a Ameren Missouri	Financial Capability
GF-2025-0053	Spire Missouri, Inc. d/b/a Spire	Financing Authority
EF-2025-0047	Union Electric Co., d/b/a Ameren Missouri	Financing Authority
ER-2024-0212	Union Electric Co., d/b/a Ameren Missouri	Financial Capability
WF-2024-0353	Missouri-American Water Company	Financing Authority
WA-2024-0325	Missouri-American Water Company	Financial Capability
ER-2024-0189	Evergy Missouri West, Inc. d/b/a Evergy Missouri West	Rate of Return, Capital Structure

cont'd List of Previous Testimony Filed

Seoung Joun Won, PhD

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<u>Case Number</u>	<u>Company</u>	<u>Issue</u>
GA-2024-0257	Spire Missouri, Inc. d/b/a Spire	Financial Capability
EO-2023-0448	Union Electric Co., d/b/a Ameren Missouri	Nuclear Decommissioning
GA-2024-0243	Spire Missouri, Inc. d/b/a Spire	Financial Capability
EA-2024-0147	Ameren Transmission Company of Illinois	Financial Capability
EA-2023-0131	Empire District Electric Company, d/b/a Liberty	Financial Capability
EF-2024-0192	Evergy Metro, Inc. d/b/a Evergy Missouri Metro	Financing Authority
WF-2024-0135	Liberty Utilities (Missouri Water) LLC d/b/a Liberty	Financing Authority
EF-2024-0099	Union Electric Co., d/b/a Ameren Missouri	Financing Authority
GA-2024-0100	Spire Missouri, Inc. d/b/a Spire	Financial Capability
EA-2023-0286	Union Electric Co., d/b/a Ameren Missouri	Financial Capability
GA-2023-0441	Spire Missouri, Inc. d/b/a Spire	Financial Capability
EF-2023-0425	Evergy Metro Inc., d/b/a Evergy Missouri Metro	Financing Authority
SA-2023-0435	Missouri-American Water Company	Financial Capability
WA-2023-0434	Missouri-American Water Company	Financial Capability
GA-2023-0389	Spire Missouri, Inc. d/b/a Spire	Financial Capability
GA-2023-0374	Spire Missouri, Inc. d/b/a Spire	Financial Capability
GF-2023-0280	Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty	Financing Authority

cont'd List of Previous Testimony Filed

Seoung Joun Won, PhD

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<u>Case Number</u>	<u>Company</u>	<u>Issue</u>
WA-2023-0345	Missouri-American Water Company	Financial Capability
EA-2023-0226	Union Electric Co., d/b/a Ameren Missouri	Financial Capability
EA-2023-0017	Grain Belt Express LLC	Financial Capability
GA-2023-0038	Spire Missouri, Inc. d/b/a Spire	Financial Capability
EF-2022-0151	Union Electric Co., d/b/a Ameren Missouri	Financing Authority
EA-2022-0328	Evergy Missouri West, Inc. d/b/a Evergy Missouri West	Financial Capability
ER-2022-0337	Union Electric Co., d/b/a Ameren Missouri	Rate of Return, Capital Structure
EA-2022-0245	Union Electric Co., d/b/a Ameren Missouri	Financial Capability
EA-2022-0244	Union Electric Co., d/b/a Ameren Missouri	Financial Capability
EA-2022-0234	NextEra Energy Transmission Southwest, LLC	Financial Capability
GR-2022-0179	Spire Missouri, Inc., d/b/a Spire	Rate of Return, Capital Structure
GF-2022- 0169	Spire Missouri, Inc.	Financing Authority
EF-2022-0164	Union Electric Co., d/b/a Ameren Missouri	Financing Authority
WF-2022-0161	Missouri-American Water Company	Financing Authority
ER-2022-0130	Evergy Missouri West, Inc., d/b/a Evergy Missouri West	Rate of Return, Capital Structure
ER-2022-0129	Evergy Metro Inc., d/b/a Evergy Missouri Metro	Rate of Return, Capital Structure
EF-2022- 0103	Evergy Missouri West, Inc.	Financing Authority

cont'd List of Previous Testimony Filed

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<u>Case Number</u>	<u>Company</u>	<u>Issue</u>
WF-2022-0066	Missouri American Water Company	Financing Authority
WF-2021-0427	Raytown Water Company	Financing Authority
GR-2021-0320	Empire District Gas Company	Rate of Return, Capital Structure
ER-2021-0312	Empire District Electric Company	Rate of Return, Capital Structure
GR-2021-0241	Union Electric Co., d/b/a Ameren Missouri	Rate of Return, Capital Structure
ER-2021-0240	Union Electric Co., d/b/a Ameren Missouri	Rate of Return, Capital Structure
GR-2021-0108	Spire Missouri, Inc.	Rate of Return, Capital Structure
EA-2021-0087	Ameren Transmission Company of Illinois	Financial Capability
EA-2020-0371	Union Electric Co., d/b/a Ameren Missouri	Financial Capability
SR-2020-0345	Missouri American Water Company	Rate of Return, Capital Structure
WR-2020-0344	Missouri American Water Company	Rate of Return, Capital Structure
EF-2020-0301	Evergy Missouri Metro	Financing Authority
WR-2020-0264	Raytown Water Company	Rate of Return, Capital Structure
WR-2020-0053	Confluence Rivers Utility Operating Company, Inc.	Rate of Return, Capital Structure
HM-2020-0039	Veolia Energy Kansas City, Inc. AIP Project Franklin Bidco	Merger and Acquisition
EO-2019-0133	KCP&L Greater Missouri Operations Company, Evergy Metro	Business Process Efficiency
EO-2019-0132	Kansas City Power & Light Company, Evergy Metro	Business Process Efficiency

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<u>Case Number</u>	<u>Company</u>	<u>Issue</u>
GR-2019-0077	Union Electric Co., d/b/a Ameren Missouri	Weather & Normalization, Net System Input
GO-2019-0059	Spire West, Spire Missouri, Inc.	Weather Variables
GO-2019-0058	Spire East., Spire Missouri, Inc.	Weather Variables
ER-2018-0146	KCP&L Greater Missouri Operations Co.	Weather & Normalization, Net System Input
ER-2018-0145	Kansas City Power & Light Co.	Weather & Normalization, Net System Input
GR-2018-0013	Liberty Utilities (Midstates Natural Gas) Corp.	Weather Variables
GR-2017-0216	Missouri Gas Energy (Laclede), Spire Missouri, Inc.	Weather Variables
GR-2017-0215	Laclede Gas Co., Spire Missouri, Inc.	Weather Variables
ER-2016-0285	Kansas City Power & Light Co.	Weather & Normalization, Net System Input
ER-2016-0179	Union Electric Co., d/b/a Ameren Missouri	Weather & Normalization, Net System Input
ER-2016-0156	KCP&L Greater Missouri Operations Co.	Weather & Normalization, Net System Input
ER-2016-0023	Empire District Electric Company	Weather & Normalization, Net System Input
ER-2014-0370	Kansas City Power & Light Co	Weather & Normalization, Net System Input
ER-2014-0351	Empire District Electric Company	Weather & Normalization, Net System Input
ER-2014-0258	Union Electric Co., d/b/a Ameren Missouri	Weather & Normalization, Net System Input
EC-2014-0223	Noranda Aluminum, Inc., et al, Complaint v. Union Electric Co., d/b/a Ameren Missouri	Weather Variables
GR-2014-0152	Liberty Utilities (Midstates Natural Gas) Corp.	Weather Variables

Seoung Joun Won, PhD

<u>Case Number</u>	<u>Company</u>	<u>Issue</u>
GR-2014-0086	Summit Natural Gas of Missouri, Inc.	Weather Variables
HR-2014-0066	Veolia Energy Kansas City, Inc.	Weather Variables, Revenue
GR-2013-0171	Laclede Gas Co.	Weather Variables
ER-2012-0345	Empire District Electric Company	Weather Variables, Revenue
ER-2012-0175	KCP&L Greater Missouri Operations Co.	Weather Variables
ER-2012-0174	Kansas City Power & Light Co.	Weather Variables
ER-2012-0166	Union Electric Co., d/b/a Ameren Missouri	Weather Variables, Revenue
HR-2011-0241	Veolia Energy Kansas City, Inc.	Weather Variables
ER-2011-0028	Union Electric Co., d/b/a Ameren Missouri	Weather Variables, Revenue
ER-2011-0004	Empire District Electric Company	Weather Variables, Revenue
GR-2010-0363	Union Electric Co., d/b/a Ameren Missouri	Weather Variables
ER-2010-0356	KCP&L Greater Missouri Operations Co.	Weather Variables
ER-2010-0355	Kansas City Power & Light Co.	Weather Variables, Revenue

Work Related Publication

Won, Seoung Joun, X. Henry Wang, and Henry E. Warren. "Climate normals and weather normalization for utility regulation." *Energy Economics* (2016).