

Exhibit No.:
Issue(s): *Locational Marginal
Prices*
Witness: *J Luebbert*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Surrebuttal Testimony*
Case No.: *EA-2025-0075*
Date Testimony Prepared: *May 14, 2025*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

SURREBUTTAL TESTIMONY

OF

J LUEBBERT

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

CASE NO. EA-2025-0075

*Jefferson City, Missouri
May 2025*

1 **SURREBUTTAL TESTIMONY OF**

2 **J LUEBBERT**

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

5 **CASE NO. EA-2025-0075**

6 Q. Please state your name and business address.

7 A. My name is J Luebbert. My business address is P.O. Box 360, Suite 700,
8 Jefferson City, MO 65102.

9 Q. Are you the same J Luebbert who contributed to the Staff Recommendation
10 report in this docket?

11 A. Yes.

12 Q. What is the purpose of your surrebuttal testimony?

13 A. I will provide a brief response to Michael Goggin, who wrote testimony on
14 behalf of the Sierra Club regarding this matter.

15 Q. Mr. Goggin discusses the impact of congestion on the dispatch of generation
16 units and the revenues that may be realized through the Southwest Power Pool (“SPP”) market.¹
17 Does Staff generally agree with the concept that nodal price differentials can drive differences
18 in the revenues realized by a given generation facility?

19 A. Yes. I have provided testimony on the topic of the importance of accounting
20 for locational differences for proposed electric generation facilities in multiple CCN dockets.²
21 The effects of the congestion and loss components of Locational Marginal Prices absolutely do
22 impact the economics of each generating unit in SPP’s footprint.

¹ This discussion begins on page 9 of Mr. Goggin’s rebuttal testimony.

² The most recent cases that I provided testimony regarding the subject of locational specific information include: EA-2024-0292, EA-2023-0286, and EA-2022-0328.

Surrebuttal Testimony of
J Luebbert

1 Q. Does Staff agree that additional modeling of alternative resources is warranted
2 based upon the flaws included in Evergy's analyses?

3 A. Yes. However, while it may be appropriate to require Evergy to conduct a
4 more robust analysis, it would not be reasonable to order that any specific resource, other than
5 the requested resources, be built as part of this application as other parties have not been
6 provided with the specific costs and benefits for a specific alternative resource that would meet
7 Evergy Missouri West's identified need. Those issues are better addressed in a separate docket.

8 Q. Does this conclude your surrebuttal testimony?

9 A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Evergy)
Missouri West, Inc. d/b/a Evergy Missouri)
West and Evergy Metro, Inc. d/b/a Evergy)
Missouri Metro for Permission and Approval)
of a Certificate of Public Convenience and)
Necessity for Natural Gas Electrical)
Production Facilities)

Case No. EA-2025-0075

AFFIDAVIT OF J LUEBBERT

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW J LUEBBERT and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Surrebuttal Testimony of J Luebbert*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

J LUEBBERT



JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 14th day of May 2025.

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: July 18, 2027 Commission Number: 15207377

Dianna L. Vaught
Notary Public