

Exhibit No.:  
Issue: Fuel Adjustment Clause  
Witness: Linda J. Nunn  
Type of Exhibit: Direct Testimony  
Sponsoring Party: Evergy Missouri West  
Case No.: ER-2025-0348  
Date Testimony Prepared: June 30, 2025

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO.: ER-2025-0348**

**DIRECT TESTIMONY**

**OF**

**LINDA J. NUNN**

**ON BEHALF OF**

**EVERGY MISSOURI WEST, INC. d/b/a EVERGY MISSOURI WEST**

**Kansas City, Missouri  
June 2025**

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

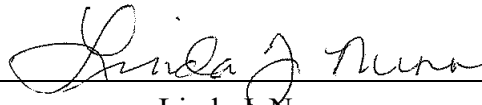
In the Matter of the Application of Evergy )  
Missouri West for Authority to Implement ) Case No. ER-2025 0348 )  
Rate Adjustments Required by 20 CSR )  
4240-20.090(8) and the Company's )  
Approved Fuel and Purchased Power Cost )  
Recovery Mechanism )

**AFFIDAVIT OF LINDA J. NUNN**

**STATE OF MISSOURI** )  
 ) ss  
**COUNTY OF JACKSON** )

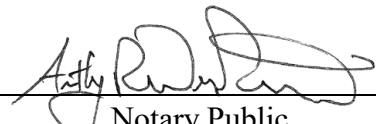
Linda J. Nunn, being first duly sworn on her oath, states:

1. My name is Linda J. Nunn. I work in Kansas City, Missouri, and I am employed by Evergy, Inc. as Manager, Regulatory Affairs.
2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Evergy Missouri West Inc. d/b/a Evergy Missouri West, consisting of consisting of eleven (11) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.
3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Linda J. Nunn

Subscribed and sworn to before me this 30th day of June 2025.

My Commission expires: April 26, 2029

  
\_\_\_\_\_  
Notary Public



**DIRECT TESTIMONY**  
**OF**  
**LINDA J. NUNN Case**  
**No. ER-2025-0348**

1   **Q:   Please state your name and business address.**

2   A:   My name is Linda J. Nunn. My business address is 1200 Main, Kansas City,  
3       Missouri 64105.

4   **Q:   By whom and in what capacity are you employed?**

5   A:   I am employed by Evergy Metro, Inc. as Manager, Regulatory Affairs for Evergy  
6       Metro, Inc. d/b/a Evergy Missouri Metro (“EMM”), Evergy Missouri West, Inc.  
7       d/b/a Evergy Missouri West (“EMW”), Evergy Metro, Inc. d/b/a Evergy Kansas  
8       Metro (“Evergy Kansas Metro”), and Evergy Kansas Central, Inc. and Evergy  
9       South, Inc., collectively d/b/a Evergy Kansas Central (“Evergy Kansas Central”).  
10      These are the operating utilities of Evergy, Inc.

11   **Q:   On whose behalf are you testifying?**

12   A:   I am testifying on behalf of EMW (“Company”).

13   **Q:   What are your responsibilities?**

14   A:   My responsibilities include the coordination, preparation, and review of financial  
15       information and schedules associated with fuel or transmission impacts on rate case  
16       filings, and the coordination, preparation and review of financial information and  
17       schedules associated with retail rider mechanism tariff filings for Evergy including:  
18       Evergy Kansas Central, Evergy Kansas Metro, Evergy Missouri Metro and Evergy  
19       Missouri West.

1   **Q:     Please describe your education.**

2   A:     I received a Bachelor of Science Degree in Business Administration with a  
3           concentration in Accounting from Northwest Missouri State University.

4   **Q:     Please provide your work experience.**

5   A:     I became a Senior Regulatory Analyst with Kansas City Power & Light  
6           (“KCP&L”) in 2008, as a part of the acquisition of Aquila, Inc., by Great Plains  
7           Energy. In 2013, I was promoted to Supervisor - Regulatory Affairs. In 2018 I  
8           became Manager, Regulatory Affairs. Prior to my employment with KCP&L, I was  
9           employed by Aquila, Inc. for a total of eleven years. In addition to Regulatory, I  
10          have had experience in Accounting, Audit, and Business Services, where I had  
11          responsibility for guiding restructuring within the delivery division. In addition to  
12          my utility experience, I was the business manager and controller for two area  
13          churches. Prior to that, I was an external auditor with Ernst & Whinney.

14   **Q:     Have you previously testified in a proceeding before the Missouri Public**  
15          **Service Commission (“MPSC” or “Commission”) or before any other utility**  
16          **regulatory agency?**

17   A:     Yes, I have testified before the MPSC, and I have provided written testimony in  
18          various dockets before the MPSC. I have also worked closely with many MPSC  
19          Staff on numerous filings as well as on rate case issues. Additionally, I have  
20          provided written testimony in Kansas Corporation Commission dockets.

21   **Q:     What is the purpose of your testimony?**

22   A:     The purpose of my testimony is to support the Fuel Adjustment Clause (“FAC”)  
23          that has been filed by Evergy Missouri West (“Company”). This FAC tariff filing

1 consists of actual fuel and purchased power costs, net of off-system sales revenues  
2 incurred by the Company. My testimony supports the rate schedule filed to adjust  
3 rates for the adjusted FAC includable costs experienced during the six-month  
4 period of December 2024 through May 2025. This six-month period represents the  
5 36th accumulation period under Evergy Missouri West's FAC, which was  
6 originally approved by the Commission in Case No. ER-2007-0004 ("2007 Case")  
7 and modified in Case Nos. ER-2009-0090, ER-2010-0356, ER-2012-0175, ER-  
8 2016-0156, ER-2018-0146, ER-2022-0130 and most recently in ER-2024-0189.  
9 The proposed FAC charge for residential customers is a credit rate of (\$0.00164)  
10 per kWh. Based on usage of 1,000 kWh per month, the customer will see a monthly  
11 credit of (\$1.64). This represents an increase of \$1.81 to an Evergy Missouri West  
12 residential customer's monthly bill compared to the current monthly FAC credit of  
13 (\$3.45).

14 **Q: Please explain why Evergy Missouri West filed the FAC adjustment rate**  
15 **schedules at this time.**

16 A: The Commission's rule governing fuel and purchased power cost recovery  
17 mechanisms for electric utilities – specifically 20 CSR 4240-20.090(8)(A) –  
18 requires Evergy Missouri West to make periodic filings to allow the Commission  
19 to review the actual net FAC includable costs the Company has incurred and to  
20 allow rates to be adjusted, either up or down, to reflect those actual costs. The  
21 Commission's rule requires at least one such review and adjustment each year.  
22 Evergy Missouri West's approved FAC calls for two annual filings – one filing  
23 covering the six-month accumulation period running from June through November

1 and another filing covering the accumulation period running from December  
2 through May. Any increases or decreases in rates in these filings are then included  
3 in the customers' bills over a subsequent 12-month recovery period.

4 For the 36th accumulation period covering the period of December 2024  
5 through May 2025, Evergy Missouri West's actual FAC includable costs were  
6 higher than the base energy costs included in base rates by approximately \$9  
7 million. In accordance with the Commission's rule and the Company's approved  
8 FAC, Evergy Missouri West has calculated the FAC tariff that provides for a  
9 change in rates to return to customers 95% of those cost changes, or approximately  
10 \$8.6 million, plus interest. These amounts are before true-up or any other  
11 adjustments.

12 In addition, a true-up filing is being made concurrent with this filing  
13 covering the 33rd accumulation period of June 2023 through November 2023 and  
14 its corresponding recovery period of March 2024 through February 2025. The  
15 proposed true-up amount consists of an under-recovery of \$743,077.

16 In summary, these amounts combined including an interest credit  
17 amounting to (\$409,319) result in a proposed 36th accumulation period FPA of  
18 \$8.9 million to be collected from customers. The tariff being submitted with this  
19 filing reflects rates effective September 1, 2025.

20 **Q: What are some of the drivers impacting this accumulation period?**

21 A: Evergy Missouri West's Actual Net Energy Costs ("ANEC"), are over the base  
22 energy costs included in base rates by approximately \$9 million. When compared  
23 to the prior 35th accumulation period, the ANEC are \$3.9 million higher in the 36th

1 accumulation. This is due to a \$10.9 million, or 16%, increase in purchased power  
2 expense. Natural gas prices averaged \$3.59 for the 36th accumulation period which  
3 is 55% higher than the \$2.32 average for the 35th accumulation period. In addition,  
4 fuel costs were \$2.9 million, or 8% higher. However, these increases to expense  
5 were offset by a \$10 million increase in off-system sales revenue.

6 **Q: Is there anything else worth noting for this semi-annual FAC filing that**  
7 **should be mentioned?**

8 A: Yes, on March 21, 2024, in Case No. EA-2023-0291, the Commission approved  
9 the Unanimous Stipulation and Agreement, effective April 20, 2024, for the  
10 Dogwood Energy Facility acquisition. In this stipulation, the Company agreed that  
11 the net revenues generated from the sale of energy and sale of capacity, ancillary  
12 services revenues, and other applicable revenues (if any) associated with EMW's  
13 percentage ownership in Dogwood shall not be recovered by ratepayers (through  
14 the fuel adjustment clause or otherwise) and shall be retained by the Company until  
15 new rates were effective from the 2024 general rate case. Case No. ER-2024-0189  
16 was effective as of January 1, 2025. Therefore for this 36th accumulation period of  
17 December 2024 through May 2025, Dogwood amounts are identified in the  
18 workpapers and are not included in the ANEC for the month of December 2024.

19 **Q: Please describe the Company's process of tracking the impact on ANEC**  
20 **related to customers serviced under the Special Incremental Load tariff,**  
21 **Schedule SIL.**

22 A: As noted in Staff's Recommendation on January 29, 2024, in Case No. ER-2024-  
23 0205: "the Company and Staff agreed to settle the Nucor methodology that Staff

1 raised concerns with. This Second Agreement resulted in a calculation that will  
2 begin with hour 1 for any event where Nucor load experiences a 25% deviation  
3 from the expected Nucor load for more than 4 hours, and the event tracking of  
4 qualified events will include the net of both positive and negative impacts for all  
5 identified qualified events in each month. Additionally, one general ledger entry  
6 will be made in the last month of each 6-month Accumulation Period, and this entry  
7 will only be made if the net result of the event tracking is an increase to non-Nucor  
8 customers during the 6-month Accumulation period, to decrease the FAR's ANEC  
9 and reduce costs to non-Nucor customers. Then after the conclusion of an  
10 Accumulation Period, the amount for the event tracking will be reset to zero."

11 **Q: What was the impact or result of the event tracking procedure as it relates to**  
12 **this 36th accumulation period?**

13 A: The Company has performed the calculations of the load balancing event tracking  
14 for the months of November 2024 through April 2025 for this 36th accumulation  
15 period of December 2024 through May 2025. The event tracking already results in  
16 a decrease to non-Nucor customers of (\$191); therefore, no entry to reduce the  
17 ANEC is included in May 2025 in this filing.

18 **Q: How did you develop the various values used to derive the proposed FARs that**  
19 **are shown on Schedule LJM-1?**

20 A: The proposed tariff rates are shown in Schedule LJM-1. The filing made in  
21 conjunction with this testimony contains all the information as set in 20 CSR 4240-  
22 20.090(8)(2)(A) which supports these proposed rates. In addition, I am submitting  
23 a copy of the workpapers that support the determination of the current FAR.



1   **Q:     Please describe the impact of the change in costs and how it will affect a typical**  
2       **customer.**

3   **A:**     The proposed current period FARs for Evergy Missouri West customers by voltage  
4       level is shown below:

5

<b>Proposed Current Period FARs</b>	
<b>Voltage</b>	
Secondary	\$0.00100
Primary	\$0.00098
Substation	\$0.00097
Transmission	\$0.00096

6

7       This is the difference between base FAC includable costs and the actual costs  
8       incurred by the Company including interest and any adjustments during the 36th  
9       accumulation period of December 2024 through May 2025 and will be included in  
10      billed FAC rates over the recovery period running from September 2025 through  
11      August 2026.

12           The proposed FAR was calculated in the manner specified in the  
13      Company's FAC tariff. Attached to my testimony, as Schedule LJN-1, is a copy of  
14      the tariff sheet with the current FAR, the prior period FAR and the total FAR that  
15      will be billed to customers over the recovery period. The FAR calculated for the  
16      34th accumulation period has been removed as its recovery period will cease in  
17      August 2025. The FAR for the 35th accumulation period is added to the FAR for  
18      the current 36th accumulation period to provide the annual FAR. Thus, given the  
19      proposed current FAR calculations, the annual FAR's for Evergy Missouri West  
20      customers are shown in the table below:

1

	ER-2025-0194		
	36th AP	35th AP	
	Proposed 1st Revised Sheet No. 124.10	Current 3rd Revised Sheet No. 127.34	
<b>Voltage</b>			<b>Impact</b>
Secondary	-\$0.00164	-\$0.00345	\$0.00181
Primary	-\$0.00159	-\$0.00336	\$0.00177
Substation	-\$0.00158	-\$0.00333	\$0.00175
Transmission	-\$0.00156	-\$0.00329	\$0.00173

2

3 These proposed rates will be billed to customers from September 2025 through  
 4 August 2026. As stated earlier, based on usage of 1,000 kWh per month, this will  
 5 result in a monthly FAC credit of (\$1.64), an increase of \$1.81 to an Evergy  
 6 Missouri West residential customer's monthly bill compared to the current monthly  
 7 FAC credit of (\$3.45).

8 **Q: If the rate schedules filed by Evergy Missouri West are approved or allowed**  
 9 **to go into effect, what safeguards exist to ensure that the revenues the**  
 10 **Company bills to its customers do not exceed the fuel and purchased power**  
 11 **costs that Evergy Missouri West actually incurred during the Accumulation**  
 12 **Period?**

13 A: Evergy Missouri West's FAC and the Commission's rules provide two mechanisms  
 14 to ensure that amounts billed to customers do not exceed the Company's actual,  
 15 prudently incurred fuel and purchased power costs. First, at the end of each  
 16 recovery period the Company is required to true up the amounts billed to customers  
 17 through the FAR with the excess fuel and purchased power costs that were actually  
 18 incurred during the accumulation period to which the FAR applies. Second, the

1 Company's fuel and purchased power costs are subject to periodic prudence  
2 reviews to ensure that only prudently incurred fuel and purchased power costs are  
3 billed to customers through Evergy Missouri West's FAC. These two mechanisms  
4 serve as checks to ensure that the Company's customers pay only the prudently  
5 incurred, actual costs of fuel and purchased power used to provide electric service.

6 **Q: Have each of these mechanisms been in effect throughout the FAC process**  
7 **since its inception in the 2007 Case?**

8 A: Yes, Evergy Missouri West recently completed its twelveth prudence review, Case  
9 No. EO-2025-0074, for the review period of December 2022 through May 2024,  
10 where MPSC Staff found no evidence of imprudence.

11 In the previous eleventh prudence review, Case No. EO-2023-0277, for the  
12 review period of June 2021 through November 2022. Parties resolved certain issues  
13 pertaining to purchased power and subsequent FAC reporting through a Non-  
14 Unanimous Stipulation and Agreement which the Commission approved on May  
15 12, 2024. As part of that settlement, the Company included in the prior 34th FAR  
16 filing, Case No. ER-2024-0382, an adjustment for Southwest Power Pool ("SPP")  
17 administrative fees of \$2,076 that were previously included in the FAC for  
18 recovery.

19 On September 14, 2022, in the Company's tenth prudence review, Case No.  
20 EO-2022-0065, the Commission approved the Non-Unanimous Stipulation and  
21 Agreement filed on July 25, 2022 where the Company agreed, with no admission  
22 of imprudence, to a one-time FAC adjustment for 2017 vintage expired RECs. The

1 Company refunded \$48,796 plus interest of \$1,968 in the 31st accumulation period  
2 filing, Case No. ER-2023-0210.

3 On May 4, 2022, in the Company's ninth prudence review, Case No. EO-  
4 2020-0262, the Commission issued its Report and Order finding Evergy was  
5 imprudent by not utilizing demand response programs to reduce energy costs for  
6 its customers during the review period of June 2018 through November 2019.  
7 Therefore, the Company refunded the amount of \$160,892 plus interest of \$10,613  
8 in the 30th accumulation period filing, Case No. ER-2023-0011. Also in the ninth  
9 prudence review, on January 20, 2021 an Ordered Adjustment for Sibley retirement  
10 costs was stipulated by parties amounting to \$1,039,646, or \$984,898 Missouri  
11 jurisdictional with 95% sharing applied. Based on the agreement by parties, rather  
12 than recovering this amount through the FAC, the Company recorded the  
13 \$1,039,646 in retirement costs to the Sibley AAO account for consideration in the  
14 2022 general rate case, Case No. ER-2022-0130, and refunded the amount of  
15 \$984,898 plus interest of \$53,550 in the 28th accumulation period FAR filing, Case  
16 No. ER-2022-0005.

17 In all previous prudence reviews, the MPSC Staff indicated in each of their  
18 reports that there were no areas of imprudence identified within the audits with the  
19 exception of Staff's recommendation in the Company's third prudence review  
20 which was taken before the Commission. However, following the Commission's  
21 review, the Commission issued its order stating no indication of imprudence by the  
22 Company.

1           In addition, the Company has made 32 true-up filings, all of which were  
2           approved by the MPSC. The 33rd true-up filing is being made concurrent with this  
3           filing covering the 33rd accumulation period of June 2023 through November 2023  
4           and its corresponding recovery period of March 2024 through February 2025. The  
5           Company's calculation of the proposed true-up resulting in an under-recovery for  
6           Eversource Missouri West has been included in the calculation of the current proposed  
7           tariff change.

8   **Q:   What action is Eversource Missouri West requesting from the Commission with**  
9   **respect to the rate schedules that the Company has filed?**

10   A:   The Company requests the Commission approve the rate schedule to be effective  
11       as of September 1, 2025.

12   **Q:   Does this conclude your testimony?**

13   A:   Yes, it does.

**EVERGY MISSOURI WEST, INC. d/b/a EVERGY MISSOURI WEST**

**P.S.C. MO. No.** 1 1st

Revised Sheet No. 124.10

Canceling P.S.C. MO. No. 1

Original Sheet No. 124.10

For Missouri Retail Service Area

FUEL ADJUSTMENT CLAUSE – Rider FAC  
FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE  
(Applicable to Service Provided January 1, 2025 and Thereafter)  
Effective for the Billing Months of September 2025 through February 2026

Accumulation Period Ending: <b>May 2025</b>			
1	Actual Net Energy Cost (ANEC) = (FC+E+PP+TC-OSSR-R)		\$113,784,769
2	Net Base Energy Cost (B)	-	\$104,685,822
	2.1 Base Factor (BF) *		
	2.2 Accumulation Period NSI (S <sub>AP</sub> )		4,312,434,022
3	(ANEC-B)		\$9,098,947
4	Jurisdictional Factor (J)	x	99.66773%
5	(ANEC-B)*J		\$9,068,714
6	Customer Responsibility	x	95%
7	95% *((ANEC-B)*J)		\$8,615,278
8	True-Up Amount (T)	+	\$743,077
9	Interest (I)	+	(\$409,319)
10	Prudence Adjustment Amount (P)	+	\$0
11	Fuel and Purchased Power Adjustment (FPA)	=	\$8,949,036
	11.1 PISA Deferral (Sec. 393.1400)		\$0
	11.2 FPA Subject to Recover in True-Up		\$8,949,036
12	Estimated Recovery Period Retail NSI (S <sub>RP</sub> )	÷	9,645,564,065
13	<b>Current Period Fuel Adjustment Rate (FAR)</b>	<b>=</b>	<b>\$0.00093</b>
14	Current Period FAR <sub>Sec</sub> = FAR x VAF <sub>Sec</sub>		\$0.00100
15	Prior Period FAR <sub>Sec</sub>	+	\$(0.00264)
16	Current Annual FAR <sub>Sec</sub>	=	\$(0.00164)
17	Current Period FAR <sub>Prim</sub> = FAR x VAF <sub>Prim</sub>		\$0.00098
18	Prior Period FAR <sub>Prim</sub>	+	\$(0.00257)
19	Current Annual FAR <sub>Prim</sub>	=	\$(0.00159)
20	Current Period FAR <sub>Sub</sub> = FAR x VAF <sub>Sub</sub>		\$0.00097
21	Prior Period FAR <sub>Sub</sub>	+	\$(0.00255)
22	Current Annual FAR <sub>Sub</sub>	=	\$(0.00158)
23	Current Period FAR <sub>Trans</sub> = FAR x VAF <sub>Trans</sub>		\$0.00096
24	Prior Period FAR <sub>Trans</sub>	+	\$(0.00252)
25	Current Annual FAR <sub>Trans</sub>	=	\$(0.00156)
26	VAF <sub>Sec</sub> = 1.0766		
27	VAF <sub>Prim</sub> = 1.0503		
28	VAF <sub>Sub</sub> = 1.0388		
29	VAF <sub>Trans</sub> = 1.0300		

\*From December 1, 2024 through December 31, 2024, the base factor was \$0.02983. Effective January 1, 2025, the base factor is \$0.02309. *Credits are shown in parentheses, e.g. (\$0.05).*