# DEFORE 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	)	Case No. ER-2025-0348
West for Authority to Implement Rate	)	Tracking No. JE-2025-0180
Adjustment Required by 20 CSR 4240-	)	
20.090(8) and the Company's Approved	)	
Fuel and Purchased Power Cost Recovery	)	
Mechanism	)	

#### STAFF'S RECOMMENDATION TO APPROVE TARIFF SHEET

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and for its recommendation states:

- 1. On June 30, 2025, <sup>1</sup> Evergy Missouri West, Inc.. d/b/a Evergy Missouri West ("Evergy Missouri West" or "Evergy") filed one tariff sheet, bearing an effective date of September 1, 2025, to revise its current annual Fuel Adjustment Rates ("FARs") of its Fuel Adjustment Clause ("FAC") for Accumulation Period 36 ("AP36"). AP36 was December 31, 2024 through May 31, 2025. The tariff sheet is P.S.C. MO. No. 1, 1st Revised Sheet No. 124.10, Cancelling P.S.C. MO No. 1, Original Sheet No. 124.10. The Commission assigned it Tracking No. JE-2025-0180.
- 2. Concurrently on June 30, Evergy Missouri West submitted a FAC true-up authorization request filing in File No. EO-2025-0347, to identify the true-up amount of \$743,077 for the 33rd Recovery Period ("RP33") and AP36 of its FAC. This under-collection amount is included in Evergy Missouri West's proposed changes to its current period fuel adjustment rates in its semi-annual FAC filing in this instant File No. ER-2025-0348, for AP36.

<sup>&</sup>lt;sup>1</sup> All date references will be to 2025 unless otherwise indicated.

- 3. Commission Rule 20 CSR § 4240-20.090(8)(F) provides that "[w]ithin thirty (30) days after the electric utility files its testimony and tariff sheet(s) to adjust its FARs, the staff shall submit a recommendation regarding its examination and analysis to the commission[.]" Staff must determine if Evergy Missouri West's proposed adjustments to its FAC rates are in accordance with 20 CSR § 4240-20.090 ("Fuel and Purchased Power Rate Adjustment Mechanisms"), § 386.266 RSMo, and the "FAC mechanism established, continued, or modified in the utility's most recent general rate proceeding."<sup>2</sup>
- 4. If the proposed rate adjustments are in accordance with the rule, statute, and FAC mechanism referenced above, 20 CSR § 4240-20.090(8)(H)(1) and (2) provide:
  - (H) Within sixty (60) days after the electric utility files its testimony and tariff sheet(s) to adjust its FARs, the commission shall either –
  - 1. Issue an interim rate adjustment order approving the tariff sheet(s) and the adjustments to the FARs [or]
  - 2. Allow the tariff sheet(s) and the adjustments to the FARs to take effect without commission order[.]
- 5. In the attached Staff Memorandum, marked <u>Appendix A</u>, Staff recommends that the Commission issue an order approving Evergy Missouri West's proposed tariff sheet P.S.C. MO. No. 1, 1st Revised Sheet No. 124.10, Cancelling P.S.C. MO. No. 1 Original Sheet No. 124.10, effective September 1, 2025.
- 6. The fuel and purchased power adjustment ("FPA") amount is \$8,949,036 (Tariff line 11), which results in a FAR of \$0.00093 per kWh (Tariff line 13).
  - 7. The FPA amount of \$8,949,036 is the sum of:
    - a. The amount of \$8,615,278 on line 7 of 1st Revised Sheet No. 124.10, which is equal to 95% of the difference between: a) Evergy Missouri

<sup>&</sup>lt;sup>2</sup> 20 CSR § 4240-20.090(8)(F)

West's Missouri jurisdiction Actual Net Energy Costs ("ANEC") (fuel costs plus net emission costs plus purchased power costs plus transmission costs less off-system sales revenue less renewable energy credit revenue), and b) Evergy Missouri West's Missouri jurisdiction Net Base Energy Cost;

- b. The true-up amount reflected on line 8 of 1st Revised Sheet No. 124.10,
   of \$743,077; and,
- c. The interest amount reflected on line 9 of 1st Revised Sheet No. 124.10, of (\$409,319).
- 8. The proposed FAR of \$0.00093 per kWh (Tariff line 13) is equal to the FPA amount of \$8,949,036 (line 11), divided by the estimated RP36 Retail Net System Input ("RNSI") at the generator level of 9,645,564,065 kWh (line 12 of 1st Revised Sheet No. 124.10).
- 9. As explained in the accompanying Staff memorandum, because of differences in line losses, there are different FARs for secondary, primary, substation and transmission voltage service levels. Listed below are Evergy Missouri West's proposed Current Annual FARs on 1st Revised Sheet No. 124.10, and the Evergy Missouri West's Current Annual FARs on 4th Revised Sheet No. 127.34 together with the changes between them for primary, secondary, substation, and transmission voltage service levels.

Evergy Missouri West Current Annual Fuel Adjustment Rate \$ per kWh					
Service	Proposed 1st Revised Sheet No. 124.10	Now Effective  4th Revised  Sheet No.  127.34	Difference		
Secondary	(\$0.00164)	(\$0.00345)	\$0.00181 Increase		
Primary	(\$0.00159)	(\$0.00336)	\$0.00177 Increase		
Substation	(\$0.00158)	(\$0.00333)	\$0.00175 Increase		
Transmission	(\$0.00156)	(\$0.00329)	\$0.00173 Increase		

- 10. The proposed changes to FARs will result in an increase to the typical Evergy Missouri West residential customer's monthly bill (based on 1,000 kWh) before taxes of \$1.81, i.e., from (\$3.45) to (\$1.64).
  - 11. Evergy Missouri West's witness explains the FAR's increase:

Evergy Missouri West's Actual Net Energy Costs ("ANEC"), are over the base energy costs included in base rates by approximately \$9 million. When compared to the prior 35th accumulation period, the ANEC are \$3.9 million higher in the 36th accumulation. This is due to a \$10.9 million, or 16%, increase in purchased power expense. Natural gas prices averaged \$3.59 for the 36th accumulation period which is 55% higher than the \$2.32 average for the 35th accumulation period. In addition, fuel costs were \$2.9 million, or 8% higher. However, these increases to expense were offset by a \$10 million increase in off-system sales revenue. <sup>3</sup>

12. Except for Evergy's RP33 true-up filing in File No. EO-2025-0347, Staff is not aware of any other matter pending before the Commission that affects or is affected by this tariff filing.

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<sup>&</sup>lt;sup>3</sup> Evergy Missouri West witness Linda J. Nunn, Direct Testimony, page 4, lines 21 through page 5, line 5.

13. The Staff's review shows Missouri Every West's filing is in compliance with Commission Rule 20 CSR § 4240-20.090, § 386.266, RSMo, and Evergy Missouri West's FAC embodied in its tariff. Staff has verified that Evergy Missouri West is not delinquent on any assessment and filed its 2024 Annual Report. Evergy Missouri West is current on its submission of its Surveillance Monitoring reports, required by 20 CSR 4240-20.090(6), and its monthly reports, required by 20 CSR 4240- 20.090(5).

**WHEREFORE**, Staff recommends that the Commission issue an order approving the following proposed tariff sheet, as filed on June 30, 2025, to become effective on September 1, 2025, subject to true-up and prudence review:

P.S.C. MO. No. 1, 1st Revised Sheet No. 124.10 Cancelling P.S.C. MO. No. 1 Original Sheet No. 124.10.

Respectfully submitted,

1s1 Paul T. Graham

Senior Counsel Missouri Bar No. 30416 P. O. Box 360 Jefferson City, MO 65102 (573) 522-8459 (Telephone) (573) 751-9285 (Fax) Paul.graham@psc.mo.gov

Attorney for the Staff of the Missouri Public Service Commission

### CERTIFICATE OF SERVICE

The undersigned certifies by his signature below that on July 29, 2025, he filed the above captioned pleading in the EFIS file of the Missouri Public Service Commission.

Isl Paul T. Graham

#### **MEMORANDUM**

TO: Missouri Public Service Commission Official Case File

File No. ER-2025-0348, Tariff Tracking No. JE-2025-0180

FROM: Brooke Mastrogiannis, Utility Regulatory Audit Supervisor

DATE: /s/ Brooke Mastrogiannis / 07-29-2025

Energy Resources Department / Date

SUBJECT: Staff Recommendation for Approval of Tariff Sheet Filed to Change Rates Related

to Evergy Missouri West, Inc.'s, d/b/a Evergy Missouri West Fuel Adjustment Clause Pursuant to the Commission's Report and Order in Case No. ER-2024-0189

DATE: July 29, 2025

#### **Staff Recommendation**

On June 30, 2025, Evergy Missouri West, Inc., d/b/a Evergy Missouri West ("Evergy Missouri West") filed one (1) tariff sheet, P.S.C. Mo. No. 1st Revised Sheet No. 124.10, Canceling Original Sheet No. 124.10, bearing a proposed effective date of September 1, 2025. This tariff is to revise Evergy Missouri West's current annual Fuel Adjustment Rates ("FARs") (lines 16, 19, 22, and 25 on 1st Revised Sheet No. 124.10) of its Fuel Adjustment Clause ("FAC"). Evergy Missouri West also filed the direct testimony of Linda J. Nunn on June 30, 2025, and submitted to Staff work papers in support of the direct testimony and filed tariff sheet.

Staff recommends the Commission issue an order approving the 1st Revised Sheet No. 124.10, Canceling Original Sheet No. 124.10 of the FAC for Evergy Missouri West, to become effective on September 1, 2025.

#### **Accumulation Period 36 FARs**

The testimony and work papers include information supporting Evergy Missouri West's calculation of the Fuel and Purchased Power Adjustment ("FPA") amount of \$8,949,036 line 11<sup>2</sup> of 1st Revised Sheet No. 124.10, for Accumulation Period 36 ("AP36") (December 31, 2024 through May 31, 2025) reflecting the sum of:

<sup>&</sup>lt;sup>1</sup> The currently effective tariff sheet is 4th Revised Sheet No. 127.34, as it is in effect until August 2025.

<sup>&</sup>lt;sup>2</sup> Line 11 is the FPA amount subject to prudence review, line 11.1 is the PISA amount deferred to a PISA regulatory asset account, and line 11.2 is the FPA amount subject to recover in true-up.

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- 1. The amount of \$8,615,278 on line 7 of 1st Revised Sheet No. 124.10, which is equal to 95% of the difference between: a) Evergy Missouri West's Missouri jurisdiction<sup>3</sup> Actual Net Energy Costs ("ANEC") (fuel costs plus net emission costs plus purchased power costs plus transmission costs less off-system sales revenue less renewable energy credit revenue), and b) Evergy Missouri West's Missouri jurisdiction Net Base Energy Cost;
- 2. The true-up amount<sup>4</sup> reflected on line 8 of 1st Revised Sheet No. 124.10, of \$743,077; and,
- 3. The interest amount reflected on line 9 of 1st Revised Sheet No. 124.10, of (\$409,319).

The proposed Current Period Evergy Missouri West FAR of \$0.00093 per kWh (line 13 1st Revised Sheet No. 124.10), is equal to Evergy Missouri West's FPA amount of \$8,949,036 divided by the estimated Recovery Period 36 ("RP36")<sup>5</sup> Retail Net System Input ("RNSI") at the generator level<sup>6</sup> ("S<sub>RP</sub>") of 9,645,564,065 kWh (line 12 of 1st Revised Sheet No. 124.10).

Because of differences in line losses for secondary, primary, substation, and transmission voltage service levels,<sup>7</sup> tariff sheet lines 14, 17, 20, and 23 reflect different current period FARs for service taken at secondary, primary, substation, and transmission voltage service levels.

The Accumulation Periods, Recovery Periods, and other specifications of Evergy Missouri West's FAC for AP36 are set out in its tariff sheets: Original Sheet No. 124 through Original Sheet No. 124.9.

Listed below are Evergy Missouri West's proposed Current Annual FARs on 1st Revised Sheet No. 124.10, and the Evergy Missouri West Current Annual FARs on 4th Revised Sheet No. 127.34 together with the changes between them for primary, secondary, substation, and transmission voltage service levels.

<sup>&</sup>lt;sup>3</sup> See line 4 of 1st Revised Sheet No. 124.10 and definition of J on Original Sheet No. 124.7.

<sup>&</sup>lt;sup>4</sup> The true-up amount was requested by Evergy Missouri West in its June 30, 2025 filing in File No. EO-2025-0347.

<sup>&</sup>lt;sup>5</sup> RP36 includes September 1, 2025 through August 31, 2026.

<sup>&</sup>lt;sup>6</sup> See definition of S<sub>RP</sub> on Original Sheet No. 124.8.

<sup>&</sup>lt;sup>7</sup> The voltage adjustment factors (VAFs) for Evergy Missouri West for primary, secondary, substation and transmission voltage service levels are included on lines 26 through 29 of 1st Revised Sheet No. 124.10.

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Evergy Missouri West Current Annual Fuel Adjustment Rate \$ per kWh			
	Proposed	Now Effective	
	1st		
Service	Revised	4th Revised Sheet	Difference
	Sheet No.	No. 127.34	
	124.10		
Secondary	(\$0.00164)	(\$0.00345)	\$0.00181 Increase
Primary	(\$0.00159)	(\$0.00336)	\$0.00177 Increase
Substation	(\$0.00158)	(\$0.00333)	\$0.00175 Increase
Transmission	(\$0.00156)	(\$0.00329)	\$0.00173 Increase

The proposed changes to FARs will result in an increase to the typical Evergy Missouri West residential customer's monthly bill (based on 1,000 kWh) before taxes of \$1.81, i.e., from (\$3.45) to (\$1.64).

In her direct testimony Ms. Nunn states:

Evergy Missouri West's Actual Net Energy Costs ("ANEC"), are over the base energy costs included in base rates by approximately \$9 million. When compared to the prior 35th accumulation period, the ANEC are \$3.9 million higher in the 36th accumulation. This is due to a \$10.9 million, or 16%, increase in purchased power expense. Natural gas prices averaged \$3.59 for the 36th accumulation period which is 55% higher than the \$2.32 average for the 35th accumulation period. In addition, fuel costs were \$2.9 million, or 8% higher. However, these increases to expense were offset by a \$10 million increase in off-system sales revenue. 8

#### **Staff Review**

Staff reviewed Evergy Missouri West's proposed 1st Revised Sheet No. 124.10, Canceling Original Sheet No. 124.10, the direct testimony of Evergy Missouri West witness Linda J. Nunn and the work papers in this filing, in addition to Evergy Missouri West's monthly information reports filed in compliance with 20 CSR 4240-20.090(5) for AP36. Staff verified that the actual fuel and purchased power costs, less off-system sales revenues, match the fuel and purchased

<sup>&</sup>lt;sup>8</sup> Evergy Missouri West witness Linda J. Nunn, Direct Testimony, page 4, lines 21 through page 5, line 5.

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power costs, less off-system sales revenues, in Evergy Missouri West's proposed 1st Revised Tariff Sheet No. 124.10. Staff reviewed Evergy Missouri West's monthly interest rates that are applied to 95% of the jurisdictional monthly cumulative under-/over- recovery of base fuel and purchased power costs for AP36 and verified that the monthly interest rates and calculations of monthly interest amounts are correct.

The information filed with the proposed tariff sheet and work papers includes sufficient data to calculate Evergy Missouri West's FARs based on the actual fuel, purchased power, emission allowance and transmission costs net of off-system sales revenue and renewable energy credit revenue provided by Evergy Missouri West for AP36.

#### **Staff Recommendation**

Staff concludes that the tariff sheet complies with the Commission's *Report and Order* in Case No. ER-2024-0189, Commission Rule 20 CSR 4240-20.090, Section 393.1400.5 RSMo, and Evergy Missouri West's FAC, as embodied in its tariff.

Evergy Missouri West requested that the 1st Revised Tariff Sheet No. 124.10, Canceling Original Tariff Sheet No. 124.10, become effective on September 1, 2025. Based on its examination and analysis of the information Evergy Missouri West filed and submitted in this case, Staff recommends the Commission issue an order approving the following proposed revised tariff sheet take effect on September 1, 2025:

P.S.C. Mo. No. 1 1st Revised Sheet No. 124.10, Canceling Original Sheet No. 124.10

Staff has verified that Evergy Missouri West is not delinquent on any assessment and has filed its 2024 Annual Report. Evergy Missouri West is current on its submission of its Surveillance Monitoring reports as required in 20 CSR 4240-20.090(6) and its monthly reports as required by 20 CSR 4240-20.090(5). Except for Evergy Missouri West's RP33 true-up filing in File No. EO-2025-0347 (also filed on June 30, 2025), Staff is not aware of any other matter pending before the Commission that affects or is affected by this tariff filing. Staff's recommendation for the Current Period FARs is based solely on the accuracy of Evergy Missouri West's calculations, and is not indicative of the prudence of the fuel costs during AP36.

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

In the Matter of the Applic		)	
Missouri West, Inc. d/b/a I		)	
West for Authority to Impl	lement Rate	)	File No. ER-2025-0348
Adjustments Required by 2	20 CSR 4240-	)	Tracking No. JE-2025-0180
20.090(8) and the Company's Approved		)	
Fuel and Purchased Power Cost Recovery		)	
Mechanism		)	
AFI	FIDAVIT OF BROOK	E MASTRO	GIANNIS
STATE OF MISSOURI	)		
	) ss		
COUNTY OF COLE	)		

COMES NOW BROOKE MASTROGIANNIS, and on her oath states that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation*, in *Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

**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 29th day of July 2025.

Notary Public

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