# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc. d/b/a	)
Evergy Missouri Metro for Authority to	)
Implement Rate Adjustments Required by	File No. ER-2026-0030
20 CSR 4240-20.090(8) and the	) Tracking: JE-2026-0012
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 July 31, 2025,<sup>1</sup> Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("Evergy Metro") filed one tariff sheet, bearing an effective date of October 1, 2025, to revise its Fuel Adjustment Rates ("FARs") of its Fuel Adjustment Clause ("FAC") for Accumulation Period 20 ("AP20"). AP20 was January 1, 2025 through June 30, 2025. The tariff sheet is MO. P.S.C. No. 7, 5th Revised Sheet No. 50.42, Cancelling MO. P.S.C. Schedule No. 7, 4th Revised Sheet No. 50.42. The Commission assigned it Tracking No. JE-2026-0012.
- 2. Concurrently on July 31, Evergy Metro submitted a FAC true-up authorization request filing in File No. EO-2026-0029, to identify the true-up amount of \$466,000 for the 17th Recovery Period ("RP17"). This under-collection amount is included in Evergy Metro's proposed changes to its current period fuel adjustment rates for AP20 in this case.<sup>2</sup>

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

<sup>&</sup>lt;sup>2</sup> Lines 8 and 9 of the tariff schedule.

- 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 Metro'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>3</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 as <u>Appendix A</u>, Staff recommends that the Commission issue an order approving Evergy Metro's proposed tariff sheet P.S.C. MO. No. 7, 5th Revised Sheet No. 50.42, Cancelling P.S.C. MO. No. 7, 4th Revised Sheet No. 50.42, effective October 1, 2025. This sheet revises Evergy Metro's FARs of its FAC for AP20 which ended June 30, 2025.
- 6. The fuel and purchased power adjustment ("FPA") amount is \$6,092,049 (Tariff line 11), which results in a FAR of \$0.00068 per kWh (Tariff line 13). This AP20 FAR of \$0.00068 per kWh is \$0.00042 more than the Accumulation Period 19 FAR of \$0.00026/kWh on line 13 of 4th Revised Sheet No. 50.42.

<sup>&</sup>lt;sup>3</sup> 20 CSR § 4240-20.090(8)(F)

- 7. As stated, the FPA amount is \$6,092,049. This amount is the sum of \$5,221,095 (Tariff line 7), the true-up amount for RP17 of \$466,000 (Tariff line 8), and the interest amount of \$404,954 (Tariff line 9), which is the interest for AP20.
- 8. The FAR of \$0.00068 per kWh (Tariff line 13) is equal to the FPA amount of \$6,092,049 (line 11), divided by the estimated recovery period retail net system input of 8,912,073,277 kWh (line 12). The proposed FAR will apply to RP20, which is Evergy Metro's billing months of October 2025 through September 2026.
- 9. As explained in the accompanying Staff memorandum, because of a difference in line losses, there are different FARs for transmission, substation, primary and secondary voltage service levels. Listed below are Evergy Metro's proposed AP20 FARs, the current AP19 FARs, and the difference between them for transmission, substation, primary, and secondary voltage service.

Proposed and Current Annual Fuel Adjustment Rates \$ per kWh				
Service	Proposed AP20 Annual FAR	Current AP19 Annual FAR	Difference	
Transmission	\$0.00097	\$0.00127	\$0.00030 decrease	
Substation	\$0.00098	\$0.00128	\$0.00030 decrease	
Primary	\$0.00098	\$0.00129	\$0.00031 decrease	
Secondary	\$0.00101	\$0.00132	\$0.00031 decrease	

- 10. Based on a monthly usage of 1,000 kWh per month, the proposed change to the secondary FAR will result in a decrease of the FAR of a typical Evergy Metro residential customer's bill<sup>4</sup> by \$0.31 per month, from \$1.32 to \$1.01.
  - 11. Evergy Metro's witness explains the FAR's decrease:

EMM's Actual Net Energy Costs ("ANEC") exceed the base energy costs included in base rates by approximately \$5.5 million. The current 20th accumulation period of January through June typically has lower retail load requirements leading to lower base energy costs compared to the previous 19th accumulation period of July through December. The ANEC for the 20th accumulation period are \$2.3 million lower than the 19th accumulation period. This is due to an \$8.2 million, or 7%, decrease in fuel costs, plus a \$17.2 million, or 20%, increase in off system sales revenue which are offset by a \$22.4 million, or 21%, increase in purchased power expense. Natural gas prices averaged \$3.55 for the 20th accumulation period which is 43% higher than the \$2.47 average for the 19th accumulation period.<sup>5</sup>

- 12. Except for Evergy Metro's RP17 true-up filing in File No. EO-2026-0029, Staff is not aware of any other matter pending before the Commission that affects or is affected by this tariff filing.
- 13. The Staff's review shows Evergy Metro's filing is in compliance with Commission Rule 20 CSR § 4240-20.090, § 386.266, RSMo, and Evergy Metro's FAC embodied in its tariff. Staff verified that Evergy Metro is not delinquent on any assessment and filed its 2024 Annual Report. Evergy Metro 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).

<sup>&</sup>lt;sup>4</sup> All residential customers take service at secondary voltage.

<sup>&</sup>lt;sup>5</sup> Evergy Metro witness Linda Nunn, Direct Testimony, page 4, line 15 through page 5, line 2.

**WHEREFORE**, Staff recommends that the Commission issue an order approving the following proposed tariff sheet, as filed on July 31, 2025, to become effective on October 1, 2025, subject to true-up and prudence review:

MO. P.S.C. No. 7, 5th Revised Sheet No. 50.42, Cancelling MO. P.S.C. No. 7, 4th Revised Sheet No. 50.42.

Respectfully Submitted,

## /s/ Tracy D. Johnson

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## **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was served via e-mail on counsel for the parties of record on this 29<sup>th</sup> day of August, 2025.

/s/ Tracy D. Johnson

## **MEMORANDUM**

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

File No. ER-2026-0030, Tariff Tracking No. JE-2026-0012

**FROM:** Teresa L. Denney, Lead Senior Utility Regulatory Auditor

<u>/s/ Teresa L. Denney</u> 8-29-25

Energy Resources Department/Date

**SUBJECT:** Staff Recommendation for Tariff Sheet Filed to Change Rates Related to Evergy

Metro, Inc., d/b/a Evergy Missouri Metro's Fuel Adjustment Clause Pursuant to the Commission's *Order Approving Stipulations and Agreements* and *Order* 

Approving Compliance Tariffs in Case No. ER-2022-0129.

**DATE:** August 29, 2025

On July 31, 2025, Evergy Metro, Inc., d/b/a Evergy Missouri Metro ("Evergy Missouri Metro"), filed with the Missouri Public Service Commission ("Commission") one tariff sheet, P.S.C. MO. No. 7 5th Revised Sheet No. 50.42, bearing a proposed effective date of October 1, 2025, and canceling P.S.C. MO. No. 7 4th Revised Sheet No. 50.42. The Commission assigned the new tariff sheet Tariff Tracking No. JE-2026-0012 and ordered Staff to file its recommendation by August 31, 2025. In this tariff sheet, Evergy Missouri Metro proposes to revise its Fuel Adjustment Rates ("FARs") of its Fuel Adjustment Clause ("FAC") for Accumulation Period 20 ("AP20"). AP20 was January 1, 2025 through June 30, 2025. Staff recommends that the Commission approve 5th Revised Sheet No. 50.42, Canceling the 4th Revised Sheet No. 50.42, and change the FAR.

Evergy Missouri Metro's July 31, 2025, filing includes the testimony of Evergy Missouri Metro witness Linda J. Nunn, Manager – Regulatory Affairs at Evergy Missouri Metro, and associated work papers. Evergy Missouri Metro's calculation of its Fuel and Purchased Power Adjustment ("FPA") is \$6,092,049, as shown on line 11 of proposed 5th Revised Sheet No. 50.42. This FPA divided by the estimated retail sales of 8,912,073,277 kWh (line 12) results in a FAR of \$0.00068 per kWh (line 13). This proposed AP20 FAR of \$0.00068 per kWh is \$0.00042 more than the Accumulation Period 19 ("AP19") FAR of \$0.00026/kWh on line 13 of 4th Revised Sheet No. 50.42.<sup>1</sup>

<sup>1</sup> AP20 FAR is the current period FAR, which is different from the current annual FAR, as described below on page 3, and also illustrated in the table on page 3. The current period FAR is added to the prior period FAR, which creates the current annual FAR. This is due to having a 12-month recovery period, but the FAR changing every 6 months.

# **Calculation of Total Company Fuel and Purchased Power Difference**

Evergy Missouri Metro's work papers for AP20 contain data and calculations for Actual Net Energy Cost ("ANEC") of \$151,261,244 (line 1) and Net Base Energy Cost ("B") of \$141,509,401 (line 2). For this filing, B equals sales of 7,736,982,002 kWh for January 2025 through June 2025 (line 2.2), multiplied by the Base Factor ("BF") of \$0.01829. The difference between ANEC and B is \$9,751,843, and this is the amount on line 3, Total Fuel and Purchased Power Difference.

The Accumulation Periods, Recovery Periods, and other specifications of Evergy Missouri Metro's FAC are set out in its tariff sheets designated Original Sheet Nos. 50.32 through 50.42.

#### **Calculation of FPA Amount**

Evergy Missouri Metro's work papers and proposed 5th Revised Sheet No. 50.42 show the FPA amount of \$6,092,049 on line 11 is the sum of:

- 1. 95% of the difference between the ANEC and the B for AP20, which is \$5,221,095 (line 7);
- 2. The true-up amount for Recovery Period 17 ("RP17") of \$466,000<sup>2</sup> (line 8); and,
- 3. The interest amount of \$404,954 (line 9), which is the interest for AP20<sup>3</sup>.

## **Calculation of FAR**

The proposed FAR of \$0.00068 per kWh (line 13), is equal to the FPA amount of \$6,092,049 (line 11) divided by the estimated recovery period retail net system input ("NSI") of 8,912,073,277 kWh (line 12). This proposed FAR would be in effect for Recovery Period 20, which is Evergy Missouri Metro's billing months of October 2025 through September 2026.

<sup>&</sup>lt;sup>2</sup> See Staff Recommendation in File No. EO-2026-0029.

<sup>&</sup>lt;sup>3</sup> Interest is defined on Evergy Missouri Metro, P.S.C.MO. No. 7, Original Sheet No. 50.39 as:

Interest applicable to (i) the difference between Missouri Retail ANEC and B for all kWh of energy supplied during an AP until those costs have been recovered; (ii) refunds due to prudence reviews ("P"), if any; and (iii) all under- or over-recovery balances created through operation of this FAC, as determined in the true-up filings ("T") provided for herein. Interest shall be calculated monthly at a rate equal to the weighted average interest paid on the Company's short-term debt, applied to the month-end balance of items (i) through (iii) in the preceding sentence.

# **Voltage Level FARs**

Because of differences in line losses for transmission, substation, primary and secondary voltage service levels,<sup>4</sup> lines 15, 19, 23, and 27 reflect different FARs for service taken at transmission, substation, primary and secondary voltage service levels, respectively.

The proposed FARs for transmission, substation, primary, and secondary service voltage levels are on lines 17, 21, 25, and 29. They are the sum of the current period FARs and Evergy Missouri Metro's prior period FARs.

Listed below are Evergy Missouri Metro's proposed AP20 FARs, the current AP19 FARs, and the difference between them for transmission, substation, primary, and secondary voltage service.

Proposed and Current Annual Fuel Adjustment Rates \$ per kWh				
Service	Proposed AP20 Annual FAR	Current AP19 Annual FAR	Difference	
Transmission	\$0.00097	\$0.00127	\$0.00030 decrease	
Substation	\$0.00098	\$0.00128	\$0.00030 decrease	
Primary	\$0.00098	\$0.00129	\$0.00031 decrease	
Secondary	\$0.00101	\$0.00132	\$0.00031 decrease	

Based on a monthly usage of 1,000 kWh per month, the proposed change to the secondary FAR would result in a decrease of the FAR of a typical Evergy Missouri Metro residential customer's bill<sup>5</sup> by \$0.31 per month, from \$1.32 to \$1.01.

<sup>&</sup>lt;sup>4</sup> The voltage adjustment factors ("VAFs") for transmission, substation, primary and secondary voltage service levels are included on lines 30 through 33, respectively, of 5th Revised Sheet No. 50.42.

<sup>&</sup>lt;sup>5</sup> All residential customers take service at secondary voltage.

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In her direct testimony, Ms. Nunn states:

EMM's Actual Net Energy Costs ("ANEC") exceed the base energy costs included in base rates by approximately \$5.5 million. The current 20th accumulation period of January through June typically has lower retail load requirements leading to lower base energy costs compared to the previous 19th accumulation period of July through December. The ANEC for the 20th accumulation period are \$2.3 million lower than the 19th accumulation period. This is due to an \$8.2 million, or 7%, decrease in fuel costs, plus a \$17.2 million, or 20%, increase in off system sales revenue which are offset by a \$22.4 million, or 21%, increase in purchased power expense. Natural gas prices averaged \$3.55 for the 20th accumulation period which is 43% higher than the \$2.47 average for the 19th accumulation period.

## **Staff Review**

Staff reviewed the proposed 5th Revised Sheet No. 50.42 filed on July 31, 2025, Ms. Nunn's direct testimony, and all the accompanying work papers, as well as Evergy Missouri Metro's monthly information reports filed in compliance with 20 CSR 4240-20.090(5) for AP20. Staff verified that the actual fuel costs, net emissions allowances, purchased power costs and transmission costs, and renewable energy credit revenues match the fuel costs, net emissions allowances, purchased power costs, and transmission costs, and renewable energy credit revenues on line 1 of Evergy Missouri Metro's proposed 5th Revised Sheet No. 50.42 filed on July 31, 2025, along with Ms. Nunn's supporting work papers. Staff also reviewed Evergy Missouri Metro's monthly interest rates that are applied to 95% of the jurisdictional monthly cumulative under/over-recovery of base fuel and purchased power costs and verified that the monthly interest rates and calculations of monthly interest amounts are correct.

## **Staff Recommendation**

Evergy Missouri Metro timely filed its 5th Revised Sheet No. 50.42 on July 31, 2025, and it complies with the Commission's *Order Approving Stipulations and Agreements* and *Order Approving Compliance Tariffs* in Case No. ER-2022-0129, Commission Rule 20 CSR 4240-20.090 (Electric Utility Fuel and Purchased Power Cost Recovery Mechanisms Filing and Submission Requirements), and Evergy Missouri Metro's FAC in its tariff.

<sup>&</sup>lt;sup>6</sup> Evergy Missouri Metro witness Linda J. Nunn, Direct Testimony, page 4, line 15 through page 5, line 2.

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Commission Rule 20 CSR 4240-20.090(8)(H)<sup>7</sup> provides in part:

- (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;
- 2. Allow the tariff sheet(s) and the adjustments to the FARs to take effect without commission order; or
- 3. If it determines the adjustment to the FARs is not in accordance with the provisions of this rule, section 386.266, RSMo, and the FAC mechanism established in the electric utility's most recent general rate proceeding, reject the proposed rate sheets, suspend the timeline of the FAR adjustment filing, set a prehearing date, and order the parties to propose a procedural schedule. The commission may order the electric utility to file tariff sheet(s) to implement interim adjusted FARs to reflect any part of the proposed adjustment that is not in question;

Evergy Missouri Metro requests that its proposed 5th Revised Sheet No. 50.42, filed July 31, 2025, become effective on October 1, 2025. The Company filed the tariff sheet with 60 days' notice. Staff, therefore, recommends the Commission issue an order approving the following proposed revised tariff sheet become effective on October 1, 2025:

P.S.C. Mo. No. 7
5th Revised Sheet No. 50.42, Canceling 4th Revised Sheet No. 50.42

Staff verified that Evergy Missouri Metro is not delinquent on any assessment and filed its 2024 Annual Report. Evergy Missouri Metro 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). Except for Evergy Missouri Metro's RP17 true-up filing in File No. EO-2025-0029, Staff is not aware of any other matter before the Commission that affects or is affected by this filing. Staff's recommendation for approval of the Current Period FARs in this case is solely based on the accuracy of Evergy Missouri Metro's calculations and is not indicative of the prudence of the actual net energy costs incurred during AP20.

<sup>&</sup>lt;sup>7</sup> Effective January 30, 2019.

## BEFORE THE PUBLIC SERVICE COMMISSION

## OF THE STATE OF MISSOURI

No. ER-2026-0030
king No. JE-2026-0012

## AFFIDAVIT OF TERESA DENNEY

STATE OF MISSOURI	)	
	)	SS
COUNTY OF COLE	)	

**COMES NOW TERESA DENNEY** and on her oath declares 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.

TERESA DENNEY

## **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 \_\_\_\_\_\_ day of August 2025.

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