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RENEW, GSR, and AEC
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MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENGINEERING ANALYSIS DEPARTMENT

SURREBUTTAL TESTIMONY

OF

AMANDA ARANDIA

**EVERGY METRO, INC.,
d/b/a Evergy Missouri Metro**

and

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

CASE NO. EO-2025-0154

Jefferson City, Missouri
September 2025

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SURREBUTTAL TESTIMONY

OF

AMANDA ARANDIA

CASE NO. EO-2025-0154

Q. Please state your name and business address.

A. My name is Amanda Arandia and my business address is 200 Madison Street, Jefferson City, Missouri 65101.

Q. Are you the same Amanda Arandia who contributed to the Staff Recommendation filed July 25, 2025?

A. Yes.

Q. What is the purpose of your surrebuttal testimony?

A. The purpose of my surrebuttal testimony is to respond to the Rebuttal Testimony of Renew Missouri (“Renew”) witness Jessica Polk Sentell regarding the Renewable Energy Program Rider, the Green Solutions Connection Rider, and the Alternative Energy Credit Rider.

RIDER RENEW

Q. What is the Renewable Energy Program Rider (“RENEW”)?

A. RENEW is a renewable energy program that would give customers the option to purchase Renewable Energy Certificates (“RECs”) from resources which Evergy already owns or has a contract to purchase energy and or RECs.

Q. Ms. Sentell expresses support for RENEW in her Rebuttal Testimony.¹
Did Ms. Sentell perform any quantitative analysis of Rider RENEW?

¹ Sentell Rebuttal Testimony, PDF p. 8, lines 1-10. References to pages in Ms. Sentell's testimony are made to the PDF page count.

Surrebuttal Testimony of
Amanda Arandia

1 A. No, she did not.²

2 Q. Did Ms. Sentell examine the pricing and billing terms of Rider RENEW?

3 A. No, she did not.³

4 Q. Ms. Sentell states on page 16, lines 18-20, of her Rebuttal Testimony that the
5 “programs will help ensure new large-load customers will ‘pay their share’ and ‘protects
6 existing and non-large load customers, and minimizes the risk of cost shift.” Did Ms. Sentell
7 perform any analysis to support this claim?

8 A. No, she did not.⁴

9 Q. Ms. Sentell states on page 8, lines 6-8, of her Rebuttal Testimony that
10 “[e]ach REC purchased will account for the production of 1 MWh of zero-emissions energy.
11 Not only will RENEW help customers reach their own sustainability goals, this program will
12 also generate revenue for all Evergy customers.” What is Staff’s response?

13 A. It is true that one REC represents that 1 MWh of electricity has been generated
14 from a certified renewable energy resource and it is true that purchasing RECs can help
15 customers reach their sustainability goals. The RECs available to this program are from sources
16 which Evergy already owns or has contracts. Evergy does not intend to acquire any new owned
17 or outside resources to support this program.⁵ These RECs are already available for Evergy to
18 sell, and it already does sell them to customers who do use them to meet their sustainability
19 goals. Rider RENEW is not needed for this purpose.

20 Q. Did Ms. Sentell discuss the interaction of Rider RENEW with Senate Bill 4
21 (“SB 4”) in her Rebuttal Testimony?

² Renew Response to Staff DR 156.

³ Renew Response to Staff DR 156.

⁴ Renew Response to Staff DR 156.

⁵ Lutz Direct Testimony, Schedule BDL-1, page 42, paragraph 4.

Surrebuttal Testimony of
Amanda Arandia

1 A. No, she did not.

2 Q. Does Staff have any concerns regarding Rider RENEW and its interactions with
3 SB 4 and the Renewable Energy Standard (“RES”)?

4 A. Yes. As stated in the Staff Recommendation, the full impact of SB 4 on Rider
5 RENEW is unclear to Staff at this time.⁶ Evergy currently has excess RECs to sell,
6 but its RES requirement will increase as it obtains more Large Load Power Service (“LLPS”)
7 customers if those customers do not qualify as an accelerated renewable buyer, which would
8 decrease the number of RECs available to the program.

9 **RIDER GSR**

10 Q. What is the Green Solutions Connection Rider (“GSR”)?

11 A. It is a voluntary, subscription-based program which, on terms to be developed
12 and approved, will provide eligible customers the opportunity to subscribe to the renewable
13 attributes of ** [REDACTED] **. ⁷

14 Q. Did Ms. Sentell examine the pricing and billing terms of Rider GSR?

15 A. No, she did not.⁸

16 Q. Ms. Sentell states on page 16, lines 6-8, of her Rebuttal Testimony that the
17 “programs will help ensure new large-load customers will ‘pay their share’ and
18 ‘protects existing and non-large load customers, and minimizes the risk of cost shift.”
19 Did Ms. Sentell perform any analysis to support this claim?

20 A. No, she did not.⁹

⁶ Staff Recommendation, page 104, lines 13-15.

⁷ Evergy Confidential Response to Staff DR 73.

⁸ Renew Response to Staff DR 157.

⁹ Renew Response to Staff DR 157.

1 Q. Does Staff have any concerns regarding the tracking and retirement of RECs for
2 Rider GSR?

3 A. Yes. As explained in Staff's Recommendation Report, REC tracking system
4 NAR¹⁰ states in its operating procedures that it has limits for the amount of RECs that can be
5 retired on the behalf of customers and Evergy is already close to reaching that limit with its
6 other programs.¹¹ ** [REDACTED]

7 [REDACTED] **. ¹²

8 Q. Did Ms. Sentell discuss the interaction of Rider GSR with SB 4 in her
9 Rebuttal Testimony?

10 A. No, she did not.

11 Q. Does Staff have any concerns regarding Rider GSR and its interactions
12 with SB 4 and the Renewable Energy Standard ("RES")?

13 A. Yes. As stated in the Staff Recommendation, the full impact of SB 4 on
14 Rider GSR is unclear to Staff at this time.¹³ Evergy currently has excess RECs to sell, but it is
15 possible that its RES requirement could increase as it obtains more LLPS customers,
16 which would decrease the number of RECs available to the program.

17 Q. Ms. Sentell states on pages page 8, line 19 to page 9, line 1, of her
18 Rebuttal Testimony that "[n]ot only will GSR help customers reach their own goals, it will also
19 help Evergy reach their stated sustainability goals of Scope 1 and 2 net-zero carbon emissions
20 by 2045." Is this an accurate statement?

¹⁰ NAR is an abbreviation for North American Renewables.

¹¹ Staff Recommendation, page 109, lines 6-7.

¹² Confidential Response to Staff DR 30 in Case No. ET-2025-0184.

¹³ Staff Recommendation, page 104, lines 13-15.

1 A. No. Approving Rider GSR in this case will not directly help Evergy reach its
2 sustainability goals. Scope 1 emissions are greenhouse gases that an organization emits from
3 sources it owns or controls directly. Scope 2 emissions are greenhouse gas emissions from
4 indirect sources, such as an organization's purchase of electricity.¹⁴ The purpose of Rider GSR
5 is to sell RECs to customers. The sale of RECs does not reduce or offset Scope 1 or Scope 2
6 emissions. I believe what Ms. Sentell referring to is the construction of the two resources that
7 would serve Rider GSR, which were already approved in Case No. EA-2024-0292.

8 Q. Ms. Sentell claims on page 9, lines 1-3, of her Rebuttal Testimony that the
9 program would contribute to the IRP process, stating that "generation resources utilized for this
10 rider program have already or will go through the IRP process, contributing to the Company's
11 long-term resource planning process." What is Staff's response?

12 A. The ** [REDACTED] ** resources were already approved in
13 Case No. EA-2024-0292. The rejection or approval of Rider GSR in the context of this case
14 has no effect on the IRP.

15 Q. On page 11, lines 6-11, of her Rebuttal Testimony, Ms. Sentell discusses a quote
16 from Mr. Gunn's testimony stating, "75 percent of the respondents to the Area Development
17 Magazine's Corporate Survey in the first quarter of 2022 indicate that 'access to renewable
18 sources of energy are very or somewhat important to their companies. And more than 90
19 percent of the survey respondents also say sustainability efforts are very or somewhat important
20 to their companies.'" What is Staff's response?

¹⁴ Michael Vereb, Arbor – Carbon Accounting, Simplified, updated February 20, 2025, *available at* <https://www.arbor.eco/blog/understanding-scope-1-2-and-3-emissions-explained-with-examples>, accessed August 18, 2025.

1 A. Ms. Sentell is quoting in her Rebuttal Testimony the Direct Testimony of Evergy
2 witness Mr. Gunn, who was in turn quoting a 2022 annual survey from Area Development
3 Magazine (based in New York). It does not appear that Ms. Sentell personally examined the
4 survey. Staff submitted a number of DRs in an attempt to collect any analyses performed by
5 Ms. Sentell supporting her testimony and received none on this topic. The same survey also
6 stated that in the next two years “fewer than one quarter of the Corporate Survey respondents
7 say they have plans to open a new domestic facility” and that only 11 percent of the planned
8 new facilities will be going to the Midwest.¹⁵

9 Q. Is this the same survey that Staff discussed on pages 105 and 109 of the
10 Staff Recommendation?

11 A. No. In the Staff Recommendation, Staff discussed ** [REDACTED]
12 [REDACTED]
13 [REDACTED] **. As discussed on page
14 105 of the Staff Recommendation, ** [REDACTED]

15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]

¹⁵ Geraldine Gambale, Area Development Magazine, *36th Annual Corporate Survey: Executive Focus on Labor, Energy, Shipping Costs*, <https://www.areadevelopment.com/Corporate-Consultants-Survey-Results/q1-2022/36th-annual-corporate-survey.shtml>, accessed August 11, 2025.

¹⁶ Staff Recommendation, page 105, lines 19-22.

¹⁷ Evergy Confidential Response to Staff DR 70.1.

¹⁸ Direct Testimony of Bradley D. Lutz, Schedule BD-1, page 87.

1 [REDACTED] [REDACTED]
2 [REDACTED] **. ¹⁹

3 Q. Did Ms. Sentell discuss in her Rebuttal Testimony the Rider GSR that has
4 already been authorized in Case No. EA-2024-0292?

5 A. No, she did not. However, she did discuss it in response to Staff DR 161,
6 in which she expressed agreement that Rider GSR for EMW should be the same as Rider GSR
7 for EMM. She stated, “[i]n general terms, the structure and details of the programs should be
8 the same” that “[i]f the structure and details of programs were not the same, it could create
9 undue competition between the jurisdictions as they competed to attract LLPS customers”
10 and “[f]urthermore, having identical programs could help with ratemaking in the long-term as
11 there would be more customers and examples of comparable markets”. Additionally, she
12 indicated that she recommended a change to the Rider GSR in this case, and more specifically
13 stated, “the provision regarding immediate repayment within 30 days of bankruptcy that is
14 contained in the GSR tariff in Docket EA-2024-0292 be included in the GSR tariff in this case.”

15 Q. Please describe the agreement regarding the Rider GSR that was filed in
16 Case No. EA-2024-0292.

17 A. In the Unanimous Stipulation and Agreement that was filed in Case No.
18 EA-2024-0292, the signatories agreed that the Commission should authorize the program for
19 which Phase 1 of the program would be supported by the facilities approved in the CCN.
20 The signatories also agreed to work on the details of the program and to file specimen tariffs in
21 the docket for Commission approval at least six months prior to the expected completion of
22 construction of the facilities.

¹⁹ Every Confidential Response to Staff DR 70.

1 Q. What were Staff's recommendations regarding Rider GSR in this case?

2 A. Staff recommended, and continues to recommend, the Commission reject
3 the program as filed in this case until such time that the program has been approved
4 in EA-20024-0292.²⁰

5 **ALTERNATIVE ENERGY CREDIT (AEC) RIDER**

6 Q. Did Ms. Sentell express support for Rider AEC in her Rebuttal Testimony?

7 A. Yes, she did.

8 Q. Did she provide any discussion of AEC other than expressing support?

9 A. No, she did not. The only mention of Rider AEC in Ms. Sentell's
10 Rebuttal Testimony was on page 16, lines 7-10. She stated, "[b]esides the specific benefits
11 already discussed for each rider program, the Fuel Adjustment Clause ('FAC') will be revised
12 to recognize revenues from the Renewable Energy Program Rider, Green Solutions Rider,
13 and Alternative Energy Credit Rider, and will return those benefits to all Evergy customers".
14 Additionally, she neglected to mention that the FAC tariff sheets cannot be changed outside of
15 a general rate case. Staff member Brooke Mastrogiannis discussed this issue and made
16 FAC recommendations in Staff's Recommendation.²¹

17 Q. Did Ms. Sentell examine the pricing and billing terms of Rider AEC?

18 A. No, she did not.²²

19 Q. Ms. Sentell states on page 16, lines 18-20, of her Rebuttal Testimony that the
20 "programs will help ensure new large-load customers will 'pay their share' and

²⁰ Staff Recommendation, page 107.

²¹ Staff Recommendation, page 66.

²² Renew Response to Staff DR 158.

Surrebuttal Testimony of
Amanda Arandia

1 'protects existing and non-large load customers, and minimizes the risk of cost shift.' Did Ms.
2 Sentell perform any analysis to support this claim?

3 A. No, she did not.²³

4 Q. Did Ms. Sentell address the tracking and retirement of AECs in her
5 Rebuttal Testimony?

6 A. No, she did not.

7 Q. Does Staff have any concerns regarding the tracking and retirement of
8 AECs for Rider AEC?

9 A. Yes. As discussed on page 109 of the Staff Recommendation, there is currently
10 no existing market for AECs and there is also no standard set by statute or rule. There are
11 currently no registries that track AECs. Although Evergy has proposed that it will hire a third
12 party to certify, track, and retire the AECs, it has yet to do so. Staff also questions whether the
13 price has been set appropriately. Additionally, as discussed on page 109 of the Staff
14 Recommendation, ** [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED] **.

18 Q. Does this conclude your surrebuttal testimony?

19 A. Yes, it does.

²³ Renew Response to Staff DR 158.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Evergy Metro,)
Inc. d/b/a Evergy Missouri Metro and Evergy)
Missouri West, Inc. d/b/a Evergy Missouri West)
for Approval of New and Modified Tariffs for)
Service to Large Load Customers)

Case No. EO-2025-0154

AFFIDAVIT OF AMANDA ARANDIA

STATE OF MISSOURI)

)

ss.

COUNTY OF COLE)

COMES NOW AMANDA ARANDIA and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Surrebuttal Testimony of Amanda Arandia*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Amanda Arandia
AMANDA ARANDIA

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 10th day of September 2025.

D. Suzie Mankin
Notary Public

