

Exhibit No.:
Issue: Fuel Adjustment Clause
Witness: Linda J. Nunn
Type of Exhibit: Direct Testimony
Sponsoring Party: Evergy Missouri West
Case No.: ER-2026-0159
Date Testimony Prepared: December 31, 2025

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2026-0159

DIRECT TESTIMONY

OF

LINDA J. NUNN

ON BEHALF OF

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

**Kansas City, Missouri
December 2025**


In the Matter of the Application of Evergy)	
Missouri West for Authority to Implement)	Case No. ER-2026 0159
Rate Adjustments Required by 20 CSR)	
4240-20.090(8) and the Company's)	
Approved Fuel and Purchased Power Cost)	
Recovery Mechanism)	

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

1. My name is Linda J. Nunn. I work in Kansas City, Missouri, and I am employed by Evergy, Inc. as Senior Manager – Regulatory Affairs.

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.

Subscribed and sworn to before me this 31st day of December 2025.


Notary Public



DIRECT TESTIMONY

OF

LINDA J. NUNN

Case No. ER-2026-0159

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 Sr. Manager, Regulatory Affairs for
6 Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“EMM”), Evergy Missouri West,
7 Inc. d/b/a Evergy Missouri West (“EMW”), Evergy Metro, Inc. d/b/a Evergy
8 Kansas Metro (“Evergy Kansas Metro”), and Evergy Kansas Central, Inc. and
9 Evergy South, Inc., collectively d/b/a Evergy Kansas Central (“Evergy Kansas
10 Central”). 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 EKC, EKM, EMM and EMW.

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

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

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

4 A: I became a Senior Regulatory Analyst with Kansas City Power & Light
5 (“KCP&L”) in 2008, as a part of the acquisition of Aquila, Inc., by Great Plains
6 Energy. In 2013, I was promoted to Supervisor - Regulatory Affairs. In 2018 I
7 became Manager, Regulatory Affairs. In 2025 I became Sr. Manager, Regulatory
8 Affairs. Prior to my employment with KCP&L, I was employed by Aquila, Inc. for
9 a total of eleven years. In addition to Regulatory, I have had experience in
10 Accounting, Audit, and Business Services, where I had responsibility for guiding
11 restructuring within the delivery division. In addition to my utility experience, I
12 was the business manager and controller for two area churches. Prior to that, I was
13 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 EMW. This FAC tariff filing consists of actual fuel and

1 purchased power costs, net of off-system sales revenues incurred by the Company.
2 My testimony supports the rate schedule filed to adjust rates for the adjusted FAC
3 includable costs experienced during the six-month period of June 2025 through
4 November 2025. This six-month period represents the 37th accumulation period
5 under EMW's FAC, which was originally approved by the Commission in Case
6 No. ER-2007-0004 ("2007 Case") and modified in Case Nos. ER-2009-0090, ER-
7 2010-0356, ER-2012-0175, ER-2016-0156, ER-2018-0146, ER-2022-0130 and
8 most recently in ER-2024-0189. The proposed FAC charge for residential
9 customers is \$0.00452 per kWh. Based on usage of 1,000 kWh per month, the
10 customer will see a monthly charge of \$4.52. This represents an increase of \$6.16
11 to an EMW residential customer's monthly bill compared to the current monthly
12 FAC credit of (\$1.64).

13 **Q: Please explain why EMW filed the FAC adjustment rate schedules at this time.**

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

1 in these filings are then included in the customers' bills over a subsequent 12-month
2 recovery period.

3 For the 37th accumulation period covering the period of June 2025 through
4 November 2025, EMW's actual FAC includable costs were higher than the base
5 energy costs included in base rates by approximately \$33.8 million. In accordance
6 with the Commission's rule and the Company's approved FAC, EMW has
7 calculated the FAC tariff that provides for a change in rates to collect from
8 customers 95% of those cost changes, or approximately \$32.1 million, plus interest.
9 These amounts are before true-up or any other adjustments.

10 In addition, a true-up filing is being made concurrent with this filing
11 covering the 34th accumulation period of December 2023 through May 2024 and
12 its corresponding recovery period of September 2024 through August 2025. The
13 proposed true-up amount results in a balance of \$154,019 remaining to be returned
14 to customers.

15 In summary, these amounts combined including interest amounting to
16 \$277,898 result in a proposed 37th accumulation period FPA of \$32.2 million to be
17 collected from customers. The tariff being submitted with this filing reflects rates
18 effective March 1, 2026.

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

20 A: EMW's Actual Net Energy Costs ("ANEC"), are over the base energy costs
21 included in base rates by approximately \$33.8 million. When compared to the prior
22 36th accumulation period, the ANEC are \$27.4 million higher in the 37th
23 accumulation. This is due to a \$21.3 million, or 28%, increase in purchased power

1 expense. Fuel costs were \$3.9 million, or 11% higher. In addition, off-system sales
2 revenue decreased \$2 million or 21%. The summer months of June through
3 November typically have higher load requirements than the previous accumulation
4 period.

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

8 A: As noted in Staff's Recommendation on January 29, 2024, in Case No. ER-2024-
9 0205: "the Company and Staff agreed to settle the Nucor methodology that Staff
10 raised concerns with. This Second Agreement resulted in a calculation that will
11 begin with hour 1 for any event where Nucor load experiences a 25% deviation
12 from the expected Nucor load for more than 4 hours, and the event tracking of
13 qualified events will include the net of both positive and negative impacts for all
14 identified qualified events in each month. Additionally, one general ledger entry
15 will be made in the last month of each 6-month Accumulation Period, and this entry
16 will only be made if the net result of the event tracking is an increase to non-Nucor
17 customers during the 6-month Accumulation period, to decrease the FAR's ANEC
18 and reduce costs to non-Nucor customers. Then after the conclusion of an
19 Accumulation Period, the amount for the event tracking will be reset to zero."

20 **Q: What was the impact or result of the event tracking procedure as it relates to**
21 **this 37th accumulation period?**

22 A: The Company has performed the calculations of the load balancing event tracking
23 for the months of May 2025 through October 2025 for this 37th accumulation

1 period of June 2025 through November 2025. The event tracking results in an
2 increase to non-Nucor customers of \$54,771 therefore, an entry to reduce the
3 ANEC by this amount is included in November 2025 in this filing.

4 **Q: How did you develop the various values used to derive the proposed FARs that**
5 **are shown on Schedule LJJN-1?**

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

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

12 A: The proposed current period FARs for EMW customers by voltage level is shown
13 below:

Proposed Current Period FARs	
Voltage	
Secondary	\$0.00352
Primary	\$0.00343
Substation	\$0.00340
Transmission	\$0.00337

14
15 This is the difference between base FAC includable costs and the actual costs
16 incurred by the Company including interest and any adjustments during the 37th
17 accumulation period of June 2025 through November 2025 and will be included in
18 billed FAC rates over the 12-month recovery period running from March 2026
19 through February 2027.

1 The proposed FAR was calculated in the manner specified in the
2 Company's FAC tariff. Attached to my testimony, as Schedule LJN-1, is a copy of
3 the tariff sheet with the current FAR, the prior period FAR and the total FAR that
4 will be billed to customers over the recovery period. The FAR calculated for the
5 35th accumulation period has been removed as its recovery period will cease in
6 February 2026. The FAR for the 36th accumulation period is added to the FAR for
7 the current 37th accumulation period to provide the annual FAR. Thus, given the
8 proposed current FAR calculations, the annual FAR's for EMW customers are
9 shown in the table below:

	ER-2025-0348		
	37th AP	36th AP	
	Proposed 2nd Revised Sheet No. 124.10	Current 1st Revised Sheet No. 124.10	
Voltage			Impact
Secondary	\$0.00452	-\$0.00164	\$0.00616
Primary	\$0.00441	-\$0.00159	\$0.00600
Substation	\$0.00437	-\$0.00158	\$0.00595
Transmission	\$0.00433	-\$0.00156	\$0.00589

10
11 These proposed rates will be billed to customers for 6-months, from March 2026
12 through August 2026. As stated earlier, based on usage of 1,000 kWh per month,
13 this will result in a monthly FAC charge of \$4.52, an increase of \$6.16 to an EMW
14 residential customer's monthly bill compared to the current monthly FAC credit of
15 (\$1.64).

16 **Q: If the rate schedules filed by EMW are approved or allowed to go into effect,**
17 **what safeguards exist to ensure that the revenues the Company bills to its**

1 **customers do not exceed the fuel and purchased power costs that EMW**
2 **actually incurred during the Accumulation Period?**

3 A: EMW's FAC and the Commission's rules provide two mechanisms to ensure that
4 amounts billed to customers do not exceed the Company's actual, prudently
5 incurred fuel and purchased power costs. First, at the end of each recovery period
6 the Company is required to true up the amounts billed to customers through the
7 FAR with the excess fuel and purchased power costs that were actually incurred
8 during the accumulation period to which the FAR applies. Second, the Company's
9 fuel and purchased power costs are subject to periodic prudence reviews to ensure
10 that only prudently incurred fuel and purchased power costs are billed to customers
11 through EMW's FAC. These two mechanisms serve as checks to ensure that the
12 Company's customers pay only the prudently incurred, actual costs of fuel and
13 purchased power used to provide electric service.

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

16 A: Yes, EMW recently completed its twelveth prudence review, Case No. EO-2025-
17 0074, for the review period of December 2022 through May 2024, where MPSC
18 Staff found no evidence of imprudence.

19 In the previous eleventh prudence review, Case No. EO-2023-0277, for the
20 review period of June 2021 through November 2022. Parties resolved certain issues
21 pertaining to purchased power and subsequent FAC reporting through a Non-
22 Unanimous Stipulation and Agreement which the Commission approved on May
23 12, 2024. As part of that settlement, the Company included in the prior 34th FAR

1 filing, Case No. ER-2024-0382, an adjustment for Southwest Power Pool (“SPP”)
2 administrative fees of \$2,076 that were previously included in the FAC for
3 recovery.

4 On September 14, 2022, in the Company’s tenth prudence review, Case No.
5 EO-2022-0065, the Commission approved the Non-Unanimous Stipulation and
6 Agreement filed on July 25, 2022 where the Company agreed, with no admission
7 of imprudence, to a one-time FAC adjustment for 2017 vintage expired RECs. The
8 Company refunded \$48,796 plus interest of \$1,968 in the 31st accumulation period
9 filing, Case No. ER-2023-0210.

10 On May 4, 2022, in the Company’s ninth prudence review, Case No. EO-
11 2020-0262, the Commission issued its Report and Order finding Evergy was
12 imprudent by not utilizing demand response programs to reduce energy costs for
13 its customers during the review period of June 2018 through November 2019.
14 Therefore, the Company refunded the amount of \$160,892 plus interest of \$10,613
15 in the 30th accumulation period filing, Case No. ER-2023-0011. Also in the ninth
16 prudence review, on January 20, 2021 an Ordered Adjustment for Sibley retirement
17 costs was stipulated by parties amounting to \$1,039,646, or \$984,898 Missouri
18 jurisdictional with 95% sharing applied. Based on the agreement by parties, rather
19 than recovering this amount through the FAC, the Company recorded the
20 \$1,039,646 in retirement costs to the Sibley AAO account for consideration in the
21 2022 general rate case, Case No. ER-2022-0130, and refunded the amount of
22 \$984,898 plus interest of \$53,550 in the 28th accumulation period FAR filing, Case
23 No. ER-2022-0005.

1 In all previous prudence reviews, the MPSC Staff indicated in each of their
2 reports that there were no areas of imprudence identified within the audits with the
3 exception of Staff's recommendation in the Company's third prudence review
4 which was taken before the Commission. However, following the Commission's
5 review, the Commission issued its order stating no indication of imprudence by the
6 Company.

7 In addition, the Company has made 33 true-up filings, all of which were
8 approved by the MPSC. The 34th true-up filing is being made concurrent with this
9 filing covering the 34th accumulation period of December 2023 through May 2024
10 and its corresponding recovery period of September 2024 through August 2025.
11 The Company's calculation of the proposed true-up has been included in the
12 calculation of the current proposed tariff change.

13 **Q: What action is EMW requesting from the Commission with respect to the rate**
14 **schedules that the Company has filed?**

15 A: The Company requests the Commission approve the rate schedule to be effective
16 as of March 1, 2026.

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

18 A: Yes, it does.

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

P.S.C. MO. No. 1 2ndRevised Sheet No. 124.10Canceling P.S.C. MO. No. 1 1stRevised 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 March 2026 through August 2026

Accumulation Period Ending: November 2025			
1	Actual Net Energy Cost (ANEC) = (FC+E+PP+TC-OSSR-R)		\$141,189,996
2	Net Base Energy Cost (B)	-	\$107,367,013
	2.1 Base Factor (BF) *		0.02309
	2.2 Accumulation Period NSI (S _{AP})		4,649,935,590
3	(ANEC-B)		\$33,822,983
4	Jurisdictional Factor (J)	x	99.81231%
5	(ANEC-B)*J		\$33,759,501
6	Customer Responsibility	x	95%
7	95% *((ANEC-B)*J)		\$32,071,526
8	True-Up Amount (T)	+	(\$154,019)
9	Interest (I)	+	\$277,898
10	Prudence Adjustment Amount (P)	+	\$0
11	Fuel and Purchased Power Adjustment (FPA)	=	\$32,195,405
	11.1 PISA Deferral (Sec. 393.1400)		\$0
	11.2 FPA Subject to Recover in True-Up		\$32,195,405
12	Estimated Recovery Period Retail NSI (S _{RP})	÷	9,832,467,347
13	Current Period Fuel Adjustment Rate (FAR)	=	\$0.00327
14	Current Period FAR _{Sec} = FAR x VAF _{Sec}		\$0.00352
15	Prior Period FAR _{Sec}	+	\$0.00100
16	Current Annual FAR _{Sec}	=	\$0.00452
17	Current Period FAR _{Prim} = FAR x VAF _{Prim}		\$0.00343
18	Prior Period FAR _{Prim}	+	\$0.00098
19	Current Annual FAR _{Prim}	=	\$0.00441
20	Current Period FAR _{Sub} = FAR x VAF _{Sub}		\$0.00340
21	Prior Period FAR _{Sub}	+	\$0.00097
22	Current Annual FAR _{Sub}	=	\$0.00437
23	Current Period FAR _{Trans} = FAR x VAF _{Trans}		\$0.00337
24	Prior Period FAR _{Trans}	+	\$0.00096
25	Current Annual FAR _{Trans}	=	\$0.00433
26	VAF _{Sec} = 1.0766		
27	VAF _{Prim} = 1.0503		
28	VAF _{Sub} = 1.0388		
29	VAF _{Trans} = 1.0300		

Credits are shown in parentheses, e.g. (\$0.05).

Issued: December 31, 2025
 Issued by: Darrin R. Ives, Vice President

Effective: March 1, 2026
 1200 Main, Kansas City, MO 64105
 Schedule LJN-1