

Exhibit No. 66

Issue: Fuel Adjustment Clause, Misc.
Accounting Adjustments;
Surveillance Reporting
Witness: Linda J. Nunn
Type of Exhibit: Surrebuttal & True-Up Direct
Testimony
Sponsoring Party: Evergy Missouri Metro and Evergy
Missouri West
Case No.: ER-2022-0129 / 0130
Date Testimony Prepared: August 16, 2022

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2022-0129 / 0130

SURREBUTTAL & TRUE-UP DIRECT TESTIMONY

OF

LINDA J. NUNN

ON BEHALF OF

EVERGY MISSOURI METRO and EVERGY MISSOURI WEST

**Kansas City, Missouri
August 2022**

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SURREBUTTAL TESTIMONY

OF

LINDA J. NUNN

Case No. ER-2022-0129 / 0130

1 **I. Introduction**

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

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

5 **Q: Are you the same Linda J. Nunn who submitted direct testimony in these**
6 **dockets on January 7, 2022?**

7 A: Yes.

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

9 A: I am testifying on behalf of Evergy Metro, Inc. d/b/a Evergy Missouri Metro
10 (“EMM”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“EMW”)
11 (collectively, the “Company”).

12 **Q: What is the purpose of your surrebuttal testimony?**

13 A: The purpose of my surrebuttal testimony is to discuss issues addressed in the
14 Missouri Public Service Commission Staff’s (“Staff”) and the Office of the Public
15 Counsel’s (“OPC”) rebuttal testimonies. Those issues are as follows:

16 Fuel Adjustment Clause (“FAC”) – Staff and OPC

17 EMW Nucor – Staff

18 EMM Surveillance Reports – Staff

1 Bad Debts – Staff
2 Rate Case Expense – OPC

3 **II. FAC**

4 **Q: What does Staff propose regarding the FAC?**

5 A: First, Staff witness Amanda Conner proposes to exclude from the FAC costs that
6 the Company has included in Federal Energy Regulatory Commission (“FERC”)
7 account 555070 because she asserts they are administrative costs.

8 **Q: Do you agree?**

9 A: No. Account 555070 is used to record the administrative service fees charged by
10 the Southwest Power Pool (“SPP”) for transactions in the SPP marketplace. Ms.
11 Connor is mistaken that these fees are not allowed in the FAC. These fees are
12 considered by the SPP to be purchased power costs, and they are necessary to
13 participate in the Integrated Marketplace (“IM”). The FAC has, since the
14 implementation of the IM, included all charge types associated with FERC account
15 555, Purchased Power.

16 The IM Clearing and the IM Facilitation fees that Ms. Conner takes issue
17 with are \$/MWh fees charged on all injections and withdrawals on the system and
18 the Transmission Congestion Rights (“TCR”) Admin Service is a fee that is based
19 on the TCR Quantity. These amounts are variable as the quantities on which they
20 are charged vary each month. In addition, these charges have been identified by
21 SPP as FERC account 555 Purchased Power costs and thus should be included in

1 the calculation of the FAC. Including these purchased power costs requires the
2 addition of the following SPP charge types to the FAC tariff sheets:

- 3 • Integrated Marketplace Clearing Administrative Service;
- 4 • Integrated Marketplace Facilitation Administrative Service; and
- 5 • Transmission Congestion Rights Administration Service.

6 The Company proposes to include these charge types in the EMM and
7 EMW FACs.

8 **Q: What other FAC issues did Ms. Conner raise?**

9 A: Ms. Conner states that the Company proposes to include amounts for Firm Bulk
10 Sales (Capacity & Fixed), which were excluded in the previous rate case Base
11 Factor (“BF”) calculation and that Staff is not in agreement because by including
12 these amounts, the complexity of administering the **transmission costs** (emphasis
13 added) for the FAC will be eliminated. This is confusing to me, as I was
14 requesting an addition to off system sales margins not transmission. Based
15 upon a review of the prior tariff sheets, sub account 447012: capacity charges for
16 capacity sales one year or less in duration has been included in the EMM tariff
17 sheet. Since EMW typically does not have capacity sales, the Company is in
18 agreement to remove this language from the EMW proposed tariff sheets.

1 **Q: On pages 8 – 10 of Ms. Conner’s rebuttal testimony, she agrees with a number**
2 **of proposals made by OPC witness Lena Mantle including changes related to**
3 **extraordinary FAC costs, decommissioning and retirement costs, research and**
4 **development costs, and language around the exclusion of Schedule MKT costs**
5 **from the FAC calculation. Do you agree?**

6 A: Partially. As stated in my rebuttal testimony, the Company agrees to include the
7 language relating to Schedule MKT costs. However, the Company disagrees with
8 the remaining suggestions as I explained in detail in my rebuttal testimony.
9 Extraordinary costs are already covered in the Code of State Regulation in the FAC
10 section. As for decommissioning and retirement costs and research and
11 development costs, the circumstances associated with these potential charges
12 should be examined at the time of incurrence because each situation will be unique
13 and will require analysis at that time to determine the appropriate treatment of these
14 items. Consequently, all tariff language changes proposed by Staff and OPC
15 relating to extraordinary FAC costs, decommissioning and retirement costs and
16 research and development costs proposed by Ms. Mantle and supported by Ms.
17 Conner should be rejected.

18

1 **Q: Ms. Conner also disagrees with additional language proposed by the Company**
2 **related to its solar subscription program. What part of the language**
3 **associated with the solar subscription programs is she disputing?**

4 A: The Company agreed in the last general rate case to include revenues at an imputed
5 75% of the unsubscribed portion of the project. In the current case, the Company
6 has made a proposal which mimics the parameters recently approved in the latest
7 Ameren rate case. The approval of this proposal would require the Company's
8 FAC tariff sheet to include the following language for future solar subscription
9 projects, "Additional revenue will be added at an imputed 100% of the
10 unsubscribed portion up to 50% unsubscribed associated with future Solar
11 Subscription Rider projects valued at market price." Ms. Conner is proposing to
12 apply the current 75% shareholder responsibility for all unsubscribed portions to
13 future projects as well. It is unknown at this time what the outcome will be in this
14 case regarding future solar subscription projects. Therefore, the language needed
15 in the FAC will be determined by the outcome of this case related to the proposed
16 future solar subscription projects.

17 **Q: OPC witness Ms. Mantle states on page 9 of her rebuttal testimony that the**
18 **cost of relying on the market by EMW has also shown up in this case through**
19 **the more than doubling of the EMW's FAC BF from the current \$0.02186 per**
20 **kilowatt hour ("kWh") to Staff's recommended \$0.04924 per kWh. Do you**
21 **agree with her assessment?**

22 A: No. Staff's FAC BF calculation contained a number of errors which have been
23 shared with Staff. The primary error was the use of an incorrect net system input

1 (“NSI”) amount. Changing to the correct NSI per Staff’s fuel run moves the
2 proposed EMW BF from \$0.04924 to \$0.02839. This is just one of the issues
3 identified and discussed with Staff regarding their FAC BF calculation. It is
4 important to note that just this one change brings the new rate to within a reasonable
5 change from what is currently in rates. The Company BF calculated in its direct
6 case was proposed to be \$0.02569 also more within the realm of reasonableness
7 when compared to the base costs in rates especially considering the state of fuel
8 prices currently.

9 **Q: Ms. Mantle also states that the percentage of transmission costs allowed to be**
10 **recovered through the FAC increased from 39.2% to 75.16% and cites this as**
11 **another example of EMW relying too heavily on the market. Do you agree**
12 **with this assessment?**

13 A: No. The transmission percentage proposed by the Company was 59.31%, much
14 lower than the amount proposed by Staff. The true-up level based on the 2021
15 FERC Form 1 is calculated at 43%. Therefore, neither of the arguments presented
16 by Ms. Mantle are accurate or effective. Please note that the percentage indicated
17 by OPC above for transmission expense is actually what Staff proposed for EMW
18 not EMM as stated in Ms. Mantle’s rebuttal testimony.

19 **Q: Ms. Mantle recommends the Commission require EMW and EMM to supply**
20 **the same information and allow the same access to information to OPC that it**
21 **does Staff. Is this request necessary?**

22 A: No. I am unaware of any information provided to Staff during the FAC process
23 that excludes OPC.

1 **Q: Ms. Mantle also recommends that the Commission should require EMW and**
2 **EMM to continue to include in its FAC monthly submissions, for each of its**
3 **wind Purchased Power Agreements (“PPA”), the MWh produced for the**
4 **month, the energy cost, the curtailment cost, and the revenues produced.**
5 **What is your response?**

6 A: The Company’s current practice is to provide the Wind PPA information and agrees
7 to continue to do so.

8 **Q: On page 25 of Ms. Mantle’s rebuttal testimony, she states that the EMM hydro**
9 **PPA was not in the setting of rates in the last case and should not be included**
10 **here. Do you agree?**

11 A: No, Ms. Mantle is incorrect. I have the workpapers that show the inclusion of the
12 hydro PPA in base rates as it relates to the types of costs included in the FAC. The
13 hydro PPA was included in base rates but portions have been excluded from the
14 ongoing FAC Fuel Adjustment Rate (“FAR”) filings as indicated by the FAC tariff
15 wording as well as the ER-2018-0145 and 0146 Non-unanimous Partial Stipulation
16 and Agreement adopted by the Commission in its Order dated October 31, 2018.
17 The language in the current FAC tariff which applies to the hydro PPA is under the
18 identifier PP = and states, “... excluding ... (2) the Missouri allocated portion of the
19 difference between the amount of the bilateral contract for hydro energy purchased
20 from CNPPID and the average monthly LMP value at the CNPPID nodes times the
21 amount of energy sold to the SPP at the CNPPID nodes. The CNPPID nodes are
22 defined as NPPD.KCPL.JFY1, NPPD.KCPL.JFY2, NPPD.KCPL.JHN1,
23 NPPD.KCPL.JN11, NPPD.KCPL.JN12”. There would be no reason to include this

1 specific language if the PPA had been excluded from base rates and the FAC BF.
2 One cannot eliminate a portion of something that is not in there originally. As
3 shown above, the hydro PPA was included in base rates in the last general rate case
4 for EMM and, accordingly, it should continue to be included here.

5 **Q: Ms. Mantle complains in her rebuttal testimony that you did not provide**
6 **adequate information regarding additions/changes proposed to the FAC tariff**
7 **sheets in your direct testimony. What is your response?**

8 A: I discussed all changes proposed in my direct testimony or identified that further
9 information was needed. A very detailed explanation of the what and why is
10 included in my rebuttal testimony in these cases. Additionally, it should be noted
11 that although the statute does not define the terms Fuel, Purchased Power,
12 Transportation or Off-system Sales, the FERC Uniform System of Accounts
13 (“USoA”) does provide definitions for these terms and provides guidance for where
14 certain costs should be recorded. Evergy follows the USoA in determining where
15 costs should be charged. Therefore, there is no need for me to go into extensive
16 detail of what each charge contains. Fuel, including transportation, purchased
17 power costs and revenues are terms that are widely understood throughout the
18 industry, are outlined in the USoA, and are reported annually on the FERC Form
19 1. Consistently denying the inclusion of like costs and revenues serves to water
20 down the FAC performance while making it unnecessarily cumbersome and
21 confusing. As indicated in my direct testimony there were several customer
22 programs proposed by the Company that could potentially have an impact on the

1 FAC. These necessary changes were fleshed out in responses to data requests as
2 well as in my rebuttal testimony.

3 **Q: Ms. Mantle states that the Commission should only allow the changes**
4 **proposed in Ms. Mantle’s direct testimonies. Do you agree?**

5 A: Please see my rebuttal testimony pages 19 through 30 along with this testimony for
6 explanations on why Ms. Mantle is mistaken.

7 **Q: On page 27 of Ms. Mantle’s testimony, she indicates that the EMW tariff**
8 **should include language that specifies how the auxiliary power for**
9 **EMW’s steam system would be removed from the FAC costs. Is this an**
10 **appropriate addition to the tariff?**

11 A: No. Auxiliary power costs will be charged to an account that is not included in the
12 FAC tariff so language in the FAC tariff is unnecessary.

13 **Q: Ms. Mantle proposes that if the Commission adopts Staff’s recommendation**
14 **that the losses of future wind PPAs not pass through the FAC, then the**
15 **Commission should insist on what she calls a refinement to Staff’s**
16 **recommendation whereby the FAC language be specific that the net losses of**
17 **new wind PPAs should be calculated on an hourly basis. Do you agree?**

18 A: No. The Company’s testimony by Ms. Kayla Messamore addresses the
19 recommendation to remove the costs of our Wind PPAs from rates. With regard to
20 Ms. Mantle’s “refinement”, the Company strongly disagrees with calculating the
21 costs/revenues of wind PPAs on an hourly basis. This proposal would have the
22 effect of giving every hour that is positive to the customer and every hour that is
23 negative to the Company. This makes all hours negative for the Company. If the

1 Company were forced to remove these wind PPAs from rates, which the Company,
2 through witness Messamore strongly contests, we would propose to net everything
3 together at the end of the month to determine the applicable positive/negative.

4 **Q: Ms. Mantle also has fuel model concerns and proposes to eliminate from base**
5 **rates all energy costs and revenues associated with the Renewable Energy**
6 **Rider (“RER”) Program for both EMM and EMW as well as those associated**
7 **with EMW’s Special Service Contract Customer Nucor. Do you agree with**
8 **this treatment?**

9 A: No, not at all. As the revenues from these two are included in the revenue
10 requirement calculation, their costs should also be included in base rates.
11 Specifically for Nucor, there is a stipulation and agreement from Case No. EO-
12 2019-0244 that specifies exactly how the revenues and costs should be handled.
13 Both costs and revenues for Nucor are included in base rates. If the revenues
14 produced by Nucor do not cover their costs, then the Company will impute revenues
15 in a rate case to cover the costs. Therefore, all revenues and costs associated with
16 Nucor should be included in base rates but excluded from the FAC.

17 As for the RER, Ms. Mantle is only suggesting to remove energy revenues
18 and costs from base rates. However, the retail revenue associated with this program
19 is included as an offset to the revenue requirement. Removing the net energy
20 cost/revenues would unduly penalize the Company by not allowing it to cover its
21 costs. The Company proposes, as has been implemented previously, that the impact
22 of those net energy costs/revenues be removed from the FAC calculation each
23 month.

1 **Q: Does Staff witness Sarah Lange discuss the Company’s FAC?**

2 A: Yes, Ms. Lange testifies that Company witness Ann Bulkley failed to acknowledge
3 “how the FAC destroys the relationship between increased energy costs and
4 increased energy sales” and goes on to describe her understanding of how an FAC
5 works generally and how it works in relation to distribution rate design.

6 **Q. Do you agree with Ms. Lange’s summary of how the FAC performs?**

7 A. No. At a high level the FAC allows the Company to defer and recover or return to
8 customers up to 95% of the difference between actual net energy costs and net base
9 energy costs, which include fuel and purchased power costs. The remaining 5% of
10 these costs are not recoverable or returnable through the FAC to encourage
11 conservation and prudence in fuel supply procurement. The FAC functions to
12 minimize volatility in fuel pricing by providing for regular adjustments to better
13 reflect costs at the time incurred. The FAC cost recovery does not change based on
14 rate design as Ms. Lange seems to suggest.

15 **Q. Is energy cost recovery “locked in” by the FAC base?**

16 A. No. Customers pay for the costs incurred. To the extent that the fuel and purchased
17 power costs are less than what was determined in the FAC base, customers receive
18 the benefit of the lower costs through an adjustment to the FAC for 95% of the
19 difference. If costs are higher than the FAC base, customers only pay 95% of the
20 difference between actual costs and the FAC base.

21 **Q: Do other Company witnesses respond to Ms. Lange?**

22 A: Yes. Ms. Bulkley addresses business risk in her testimony on cost of capital.
23 Company witness Marisol Miller testifies on rate design.

1 **III. EMW Nucor**

2 **Q: Staff witness J Luebbert discusses the Stipulation filed in Docket No. EO-2019-**
3 **0244 which established the Nucor special rate as well as identified the**
4 **requirements related to Nucor's costs covering its expenses and asserts that an**
5 **adjustment to EMW's revenue requirement should have been included in**
6 **EMW's direct testimony in this case based on the hold harmless provisions of**
7 **the Schedule SIL tariff sheets and the Stipulation. Do you agree?**

8 A: No.

9 **Q: Mr. Luebbert states that Nucor revenues for the twelve months ended**
10 **December 31, 2021 did not cover its costs for that same time period. Is this**
11 **correct?**

12 A: Yes, for that time period Nucor did not fully cover its costs with its
13 revenues.

14 **Q: Does this mean an imputation of revenue in this case is warranted?**

15 A: No. This revenue shortfall was due to the extraordinary purchased power costs
16 incurred during winter storm Uri. Ongoing fuel and purchased power costs should
17 not reflect the impact of an extraordinary event. The Company normalized and
18 annualized purchased power costs associated with Nucor for the purposes of
19 analyzing whether Nucor's costs were covered by their revenues on an on-going
20 basis.

1 **Q: Were any of those extraordinary costs borne by EMWs other customers?**

2 A: No. All of those extraordinary costs were borne by the Company's
3 shareholders as they are excluded from the FAC and have also been
4 excluded from the deferral for which EMW is requesting securitization.

5 **Q: Does the Company agree with Mr. Luebbert that capacity costs were**
6 **initially excluded from the comparison?**

7 A: Yes, the Company has already acknowledged that it inadvertently left those costs
8 off of the quarterly (now semi-annual) reports. Each of those reports has been
9 updated to include the capacity costs associated with Nucor. These reports have
10 been distributed to all parties associated with the Nucor settlement including the
11 Commission Staff. These costs also did not cause Nucor's normalized costs to
12 exceed its revenues.

13 **Q: Did the original exclusion of these capacity costs from the periodic reports**
14 **cause harm to any EMW customer?**

15 A: No. Just like the extraordinary costs associated with winter storm Uri, none of these
16 costs have impacted any customer as they do not pass through the FAC whether
17 identified as Nucor related or not. Capacity costs for contracts in excess of one
18 year do not flow through the FAC.

19 **Q: Do you agree with Mr. Luebbert's rebuttal testimony where he says that direct**
20 **testimony would have been the appropriate place to include an adjustment to**
21 **revenue regarding any Nucor deficiency?**

22 A: Yes. The direct filing is where I would have made an adjustment if it were
23 appropriate, but as I've stated in my direct and rebuttal testimonies, no adjustment

1 was warranted thus; no adjustment was made. I've spoken above about the
2 extraordinary purchased power costs associated with Winter Storm Uri as well as
3 the impact of inadvertently leaving out the capacity costs on the quarterly report.
4 I've also spoken to the fact that neither of these issues had any impact on any
5 customer of EMW.

6 **Q: Was there one more issue identified by Mr. Luebbert in his rebuttal testimony**
7 **relating to Nucor?**

8 A: Yes, as for the issue relating to Mr. Luebbert's customer event balancing, please
9 see the rebuttal and surrebuttal testimony of Company witnesses John Carlson.

10 IV. EMM Surveillance Reports

11 **Q: Staff witness Ms. Lyons disagrees with EMM's proposal to discontinue annual**
12 **surveillance reports, arguing that EMM's FAC quarterly surveillance reports**
13 **(which also includes MEEIA reporting) do not include the level of detail and**
14 **support that is provided in annual surveillance reports. What is your**
15 **response?**

16 A: I want to reiterate that the annual report was implemented at a time when Evergy
17 (formerly KCP&L) had not had a rate case in many years. Therefore, Staff and
18 OPC had little opportunity to monitor the regulated earnings of the Company.
19 Currently, not only are these reports required quarterly, the Company is also
20 required to file a complete rate case with all of the information associated with a
21 case every four years. Parties have plenty of opportunity on a regular basis to
22 review earned ROEs as well as detailed Company financial and operational
23 information. In addition, pointing out that the quarterly surveillance report includes

1 reporting for MEEIA has no impact on the quarterly financial surveillance report
2 filed in EFIS.

3 **Q: Are the reports completely different as indicated by Ms. Lyons?**

4 A: No. Both reports provide rate base, rate of return calculated at the weighted average
5 cost of capital, revenues and expenses for the same time period as the annual report.
6 Although the quarterly reports do include quarterly information, they also provide
7 twelve months ended information. Therefore, the December report will be for the
8 same time period as the annual report. Further, the reports are not prepared for
9 different purposes. Both reports are prepared in order to determine achieved return
10 on equity and compare that to the authorized return on equity granted in the
11 Company's most recent rate case.

12 The idea behind a surveillance report is not to do a complete annualization
13 and normalization process. Neither report is a perfect representation of a regulated
14 return on equity. All surveillance reporting will be a representation of the amount
15 earned. But, a full review is completed at least every four years and often times
16 sooner within the rate case process providing all of the detailed analysis needed.
17 Requiring this duplication of effort is unnecessary. The Company continues to
18 request that the annual report requirement be discontinued.

1 **V. Bad Debts**

2 **Q: Mr. Majors spends 10 pages in his rebuttal testimony explaining why it is**
3 **inappropriate to calculate bad debts on the revenue requirement in this case.**
4 **What is your response?**

5 A: Mr. Majors agrees that bad debts are calculated for rate case purposes using a net
6 write off percentage of revenues based upon a six-month lag from when revenues
7 are incurred. For the current case, the Company used the 2019 ratio. Staff used the
8 current ratio which produced an unusually small ratio of net bad debt write offs
9 compared to revenues billed. The mis-use of the current time period ratio is
10 addressed in my rebuttal testimony. In my rebuttal testimony I address the
11 Company’s proposal to calculate bad debts on any rate increase revenue awarded
12 in this case.

13 **Q: Do you have further support for your position?**

14 A: Yes. The position held by Staff is contrary to the Commission decision in Case No.
15 ER-2006-0314 (“2006 Case”).

16 **Q: How was this issue determined in that case?**

17 A: In that case, the Commission ruled in the Company’s favor on this identical issue.
18 The Commission described the issue as follows: “Should the bad debt percentage
19 be applied to reflect the total revenues, including any rate increase in Missouri
20 jurisdictional retail revenues awarded in this proceeding?” Report and Order, Case
21 No. ER-2006-0314 (Dec. 21, 2006). As stated on page 63 of the 2006 Case Report
22 and Order, the Commission found that “the competent and substantial evidence
23 supports KCPL’s position, and finds this issue in favor of KCPL. The Commission

1 understands Staff’s argument that there is not a perfect positive correlation between
2 retail sales and the percentage of bad debts. While it’s possible that KCPL’s bad
3 debt expense could decrease, the Commission finds it more probable, and therefore
4 just and reasonable, that an increase in the amount of revenue that KCPL is allowed
5 to collect from its Missouri retail ratepayers will result in a corresponding increase
6 in bad debt expense.”

7 **Q: Should the Commission grant an adjustment for bad debt expense relating to**
8 **the revenue requirement adjustment from this case?**

9 A: Yes. The Commission should rely on this logical methodology to arrive at an
10 annualized level of bad debt expense in this rate case. Applying the bad debt factor
11 to the new level of revenues that will result from this rate case is a logical policy
12 and should be re-affirmed by the Commission in this case.

13 **Q: Should the Commission also apply the “factor up” methodology to late**
14 **payment fees (forfeited discounts)?**

15 A: Yes. If the Commission grants the Company’s request regarding the bad debt factor
16 applied to the new revenue requirement, then the same methodology should be
17 applied to late payment fees. It is reasonable to apply the same methodology to late
18 payment fees associated with the new revenue requirement granted in this case.
19 Given the standard practice of basing bad debts and forfeited discounts on a
20 percentage of retail revenues, the increase (or decrease) awarded in a rate case
21 should be include in the calculation of bad debts and forfeited discounts. When
22 retail revenue changes the level of bad debts and forfeited discounts likely will
23 follow.

1 **VI. Rate Case Expense**

2 **Q: Has OPC witness Cassidy Weathers provided incremental testimony related**
3 **to rate case expense?**

4 A: Not really. OPC witness Ms. Weathers provides dollar amounts to go along with
5 her direct testimony. Her stance of requiring a sharing of rate case expense
6 (excluding depreciation study and line loss study costs which she includes at 100%)
7 50%/50% between customers and shareholders is unchanged, and my rebuttal
8 testimony on pages 11 through 15 provide an explanation as to why this is an
9 inappropriate way to set recovery for rate case expense.

10 **Q: Does that conclude your surrebuttal testimony?**

11 A: Yes it does.

TRUE-UP DIRECT TESTIMONY

OF

LINDA J. NUNN

Case Nos. ER-2022-0129 and ER-2022-0130

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: Are you the same Linda J. Nunn who submitted direct testimony in these**
5 **dockets on January 7, 2022?**

6 A: Yes.

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

8 A: I am testifying on behalf of Evergy Metro, Inc. d/b/a Evergy Missouri Metro
9 (“EMM”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“EMW”)
10 (collectively, the “Company”).

11 **Q: What is the purpose of your True-up Direct testimony?**

12 A: The purpose of my true-up direct testimony is to update the base FAC calculation
13 as well as the proposed FAC tariff sheets for both EMM and EMW.

14 FAC True-up Base Calculation

15 For EMM the true-up model supports a \$0.01824 per kWh base rate. For
16 EMW, the true-up model supports a \$0.02550 per kWh base rate. I’ve included in
17 Schedules LJM – 9 and LJM - 10 the Company proposed FAC tariffs which address
18 all issues included in the Company’s Direct, Rebuttal and Surrebuttal testimonies
19 related to all changes proposed throughout the case associated with the FAC tariffs.

1 These include the proposed customer programs, the Company accepted positions
2 of the OPC and Commission Staff, and all changes proposed by the Company in
3 this proceeding. Please note that these are the currently proposed tariff sheets. All
4 past tariff sheets had the necessary heading changes proposed in direct testimony
5 and will flow through to this update.

6 **Q: Does that conclude your true-up direct testimony?**

7 A: Yes, it does.

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

In the Matter of Evergy Metro, Inc. d/b/a Evergy)
Missouri Metro’s Request for Authority to) Case No. ER-2022-0129
Implement A General Rate Increase for Electric)
Service)
In the Matter of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West’s Request for Authority to) Case No. ER-2022-0130
Implement A General Rate Increase for Electric)
Service)

AFFIDAVIT OF LINDA J. NUNN

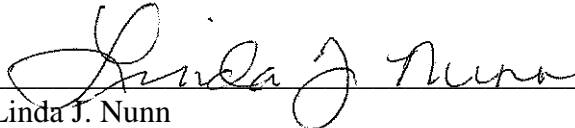
STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

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

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

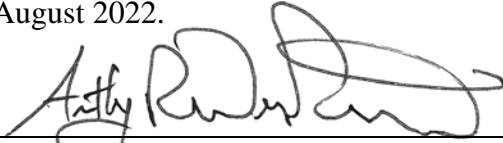
2. Attached hereto and made a part hereof for all purposes is my Surrebuttal & True-Up Direct Testimony on behalf of Evergy Missouri Metro and Evergy Missouri West consisting of twenty (20) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

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 before me this 16th day of August 2022.



Notary Public

My commission expires: 4/26/2025



P.S.C. MO. No. 7

Original Sheet No. 50.32

Canceling P.S.C. MO. No. _____

Sheet No. _____

For Missouri Retail Service Area

FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC
(Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)

DEFINITIONS

ACCUMULATION PERIODS, FILING DATES AND RECOVERY PERIODS: An accumulation period is the six calendar months during which the actual costs and revenues subject to this rider will be accumulated for the purposes of determining the Fuel Adjustment Rate (“FAR”). The two six-month accumulation periods each year through four years from the effective date of this tariff sheet, the two corresponding twelve-month recovery periods and the filing dates are as shown below. Each filing shall include detailed work papers in electronic format with formulas intact to support the filing.

Accumulation Periods

January – June
July – December

Filing Dates

By August 1
By February 1

Recovery Periods

October – September
April – March

A recovery period consists of the months during which the FAR is applied to retail customer billings on a per kilowatt-hour (kWh) basis.

COSTS AND REVENUES: Costs eligible for the Fuel and Purchased Power Adjustment (“FPA”) will be the Company’s allocated jurisdictional costs for the fuel component of the Company’s generating units, reservation charges, purchased power energy charges including applicable Southwest Power Pool (“SPP”) charges, emission allowance costs and amortizations, cost of transmission of electricity by others associated with purchased power and off-system sales, and the costs described below associated with the Company’s hedging programs – all as incurred during the accumulation period. These costs will be offset by jurisdictional off-system sales revenues, applicable SPP revenues, ~~and~~ revenue from the sale of Renewable Energy Certificates or Credits (“REC”) and retail revenues associated with specific customer programs identified. Eligible costs do not include the purchased power demand costs associated with purchased power contracts in excess of one year or costs associated with service provided to customers taking energy through Schedule MKT. Likewise, revenues do not include demand or capacity receipts associated with power contracts in excess of one year.

APPLICABILITY

The price per kWh of electricity sold to retail customers not served under Schedule MKT will be adjusted (up or down) in April and October ~~periodically~~ subject to application of the Rider FAC and approval by the Missouri Public Service Commission (“MPSC” or “Commission”).

The FAR is the result of dividing the FPA by forecasted Missouri retail net system input (“SRP”) for the recovery period, expanded for Voltage Adjustment Factors (“VAF”), rounded to the nearest \$0.00001, and aggregating over two accumulation periods. The amount charged on a separate line on retail customers’ bills is equal to the current annual FAR multiplied by kWh billed.

FUEL ADJUSTMENT CLAUSE – Rider FAC
 FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC
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FORMULAS AND DEFINITIONS OF COMPONENTS

FPA = 95% * ((ANEC – B) * J) + T + I + P

ANEC = Actual Net Energy Costs = (FC + E + PP + TC – OSSR – R - **REV**)

FC = Fuel ~~C~~osts Incurred to ~~S~~upport ~~S~~ales:
 The following costs reflected in Federal Energy Regulatory Commission (“FERC”) Account Number 501:

Subaccount 501000: coal commodity and transportation, side release and freeze conditioning agents, dust mitigation agents, applicable taxes, accessorial charges as delineated in railroad accessorial tariffs [additional crew, closing hopper railcar doors, completion of loading of a unit train and its release for movement, completion of unloading of a unit train and its release for movement, delay for removal of frozen coal, destination detention, diversion of empty unit train (including administration fee, holding charges, and out-of-route charges which may include fuel surcharge), diversion of loaded coal trains, diversion of loaded unit train fees (including administration fee, additional mileage fee or out-of-route charges which may include fuel surcharge), fuel surcharge, held in transit, hold charge, locomotive release, miscellaneous handling of coal cars, origin detention, origin re-designation, out-of-route charges (including fuel surcharge), out-of-route movement, pick-up of locomotive power, placement and pick-up of loaded or empty private coal cars on railroad supplied tracks, placement and pick-up of loaded or empty private coal cars on shipper supplied tracks, railcar storage, release of locomotive power, removal, rotation and/or addition of cars, storage charges, switching, trainset positioning, trainset storage, and weighing], unit train maintenance, leases, taxes and depreciation, natural gas costs including reservation charges, fuel quality adjustments, fuel hedging costs, fuel adjustments included in commodity and transportation costs, broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers) and margins (cash or collateral used to secure or maintain the Company's hedge position with a brokerage or exchange), oil costs for commodity, transportation, storage, taxes, fees, and fuel losses, coal and oil inventory adjustments, and insurance recoveries, subrogation recoveries and settlement proceeds for increased fuel expenses in the 501 Accounts.

Subaccount 501020: the allocation of the allowed costs in the 501000, 501300, ~~and~~ 501400 and 501420 accounts attributed to native load;

Subaccount 501030: the allocation of the allowed costs in the 501000, 501300, ~~and~~ 501400 and 501420 accounts attributed to off system sales;

Subaccount 501300: fuel additives and consumable costs for Air Quality Control Systems (“AQCS”) operations, such as ammonia, hydrated lime, lime, limestone, limestone inventory adjustments, powder activated carbon, calcium bromide, sulfur, and RESPond, or other consumables which perform similar functions;

Subaccount 501400 and 501420: residuals costs and revenues associated with combustion byproducts, slag and ash disposal costs and revenues including contractors, materials and other miscellaneous expenses.

The following costs reflected in FERC Account Number 518:

Subaccount 518000: nuclear fuel commodity and hedging costs; insurance recoveries, subrogation recoveries and settlement proceeds for increased fuel expenses in the 518 Accounts

Subaccount 518201: nuclear fuel waste disposal expense;

Subaccount 518100: nuclear fuel oil.

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 (Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)

FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

The following costs reflected in FERC Account Number 547:

Subaccount 547000: natural gas, and oil costs for commodity, ~~capacity~~, transportation, storage, taxes, fees and fuel losses, hedging costs for natural gas, oil, and natural gas used to cross-hedge purchased power or sales, and settlement proceeds, insurance recoveries, subrogation recoveries for increased fuel expenses, broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers); and margins (cash or collateral used to secure or maintain the Company's hedge position with a brokerage or exchange);

Subaccount 547020: the allocation of the allowed costs in the 547000 and 547300 accounts attributed to native load;

Subaccount 547027: natural gas reservation charges;

Subaccount 547030: the allocation of the allowed costs in the 547000 and 547300 accounts attributed to off system sales;

Subaccount 547300: fuel additives and consumable costs for Air Quality Control Systems ("AQCS") operations, such as ammonia or other consumables which perform similar functions.

E = Net Emission Costs:

The following costs and revenues reflected in FERC Account Number 509:

Subaccount 509000: NOx and SO₂ emission allowance costs and revenue amortizations offset by revenues from the sale of NOx and SO₂ emission allowances including any associated hedging costs, broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers) ~~offset by revenue amortizations and revenues from the sale of NOx and SO₂ emission allowances and margins (cash or collateral used to secure or maintain the Company's hedge position with a brokerage or exchange).~~

PP = Purchased Power Costs:

The following costs or revenues reflected in FERC Account Number 555:

Subaccount 555000: purchased power costs, energy charges from capacity purchases of any duration, insurance recoveries, and subrogation recoveries for purchased power expenses, hedging costs including broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers) and margins (cash or collateral used to secure or maintain the Company's hedge position with a brokerage or exchange), charges and credits related to the SPP Integrated Marketplace ("IM") or other IMs, including energy, revenue neutrality, make whole and out of merit payments and distributions, over collected losses payments and distributions, Transmission Congestion Rights ("TCR") and Auction Revenue Rights ("ARR") settlements, virtual energy costs, revenues and related fees where the virtual energy transaction is a hedge in support of physical operations related to a generating resource or load, load/export charges, ancillary services including non-performance and distribution payments and charges and other miscellaneous SPP Integrated Market charges including uplift charges or credits,

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Original Sheet No. 50.35

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For Missouri Retail Service Area

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FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC
(Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)

FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

PP = Purchased Power Costs (continued):

excluding (1) the amounts associated with purchased power agreements associated with the Renewable Energy Rider tariff (2) amounts associated with the purchase of power for customers served under the MKT Schedule and (3) the Missouri allocated portion of the difference between the amount of the bilateral contract for hydro energy purchased from CNPPID and the average monthly LMP value at the CNPPID nodes times the amount of energy sold to the SPP at the CNPPID nodes. The CNPPID nodes are defined as NPPD.KCPL.JFY1, NPPD.KCPL.JFY2, NPPD.KCPL.JHN1, NPPD.KCPL.JN11, NPPD.KCPL.JN12;

Subaccount 555005: capacity charges for capacity purchases one year or less in duration;

Subaccount 555030: the allocation of the allowed costs in the 555000 account attributed to purchases for off system sales.

Subaccount 555070: includes SPP purchased power administration fees.

TC = Transmission Costs:

The following costs reflected in FERC Account Number 565:

Subaccount 565000: non-SPP transmission used to serve off system sales or to make purchases for load and 7.1826.40% of the SPP transmission service costs which includes the schedules listed below as well as any adjustment to the charges in the schedules below:

- Schedule 7 – Long Term Firm and Short Term Point to Point Transmission Service
- Schedule 8 – Non Firm Point to Point Transmission Service
- Schedule 9 – Network Integration Transmission Service
- Schedule 10 – Wholesale Distribution Service
- Schedule 11 – Base Plan Zonal Charge and Region Wide Charge

excluding amounts associated with portions of purchased power agreements dedicated to specific customers under the Renewable Energy Rider tariff.

Subaccount 565020: the allocation of the allowed costs in the 565000 account attributed to native load;

Subaccount 565027: the allocation of the allowed costs in the 565000 account attributed to transmission demand charges;

Subaccount 565030: the allocation of the allowed costs in the 565000 account attributed to off system sales.

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FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

OSSR = Revenues from Off-System Sales:
 The following revenues or costs reflected in FERC Account Number 447:
 Subaccount 447020: all revenues from off-system sales. This includes charges and credits related to the SPP IM, or other IMs, including, energy, ancillary services, revenue sufficiency (such as make whole payments and out of merit payments and distributions), revenue neutrality payments and distributions, over collected losses payments and distributions, TCR and ARR settlements, demand reductions, virtual energy costs and revenues and related fees where the virtual energy transaction is a hedge in support of physical operations related to a generating resource or load, generation/export charges, ancillary services including non-performance and distribution payments and SPP uplift revenues or credits, hedging costs, but excluding (1) off-system sales revenues from full and partial requirements sales to municipalities that are served through bilateral contracts in excess of one year and (2) the amounts associated with purchased power agreements associated with the Renewable Energy Rider tariff. Additional revenue will be added at an imputed 75% of the unsubscribed portion associated with the Solar Subscription Rider valued at market price. For future solar subscription projects, additional revenue will be added at an imputed 100% of the unsubscribed portion up to 50%;
 Subaccount 447012: capacity charges for capacity sales one year or less in duration;
 Subaccount 447030: the allocation of the includable sales in account 447020 not attributed to retail sales.

R = Renewable Energy Credit Revenue:
 Revenues reflected in FERC account 509000 and gains or losses to be recorded in FERC accounts 411800 and 411900 from the sale of ~~Renewable Energy Credits (RECs)~~ that are not needed to meet the Missouri Renewable Energy Standards less the cost associated with making the sale.
Revenues from excess RECs sold for the benefit of specific tariff participation less the cost associated with making the sale. Any costs to purchase RECs for the Business EV Charging Service Carbon Free Energy Option recorded in FERC account 509000 including the NAR fees incurred to administer these programs.

Rev = Retail revenues in accounts 440 - 442, resources XXXX and XXXX associated with the low-income solar subscription and the Business EV Charging Service Carbon Free Energy Option, less the costs of retiring the RECs for these programs.

Any cost identified above which is a Missouri-only cost shall be grossed up by the current kWh energy factor, included in the ANEC calculation and allocated as indicated in component J below. Any cost identified above which is a Kansas-only cost shall be excluded from the ANEC calculation.

Hedging costs are defined as realized losses and costs (including broker commissions, fees, and margins) minus realized gains associated with mitigating volatility in the Company's cost of fuel, fuel additives, fuel transportation, emission allowances, transmission and power purchases or sales, including but not limited to, the Company's use of derivatives whether over-the counter or exchange traded including, without limitation, futures or forward contracts, puts, calls, caps, floors, collars, swaps, TCRs, virtual energy transactions, or similar instruments.

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FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

Costs and revenues not specifically detailed in Factors FC, PP, E, TC, OSSR, or R shall not be included in the Company's FAR filings; provided however, in the case of Factors PP, TC or OSSR, the market settlement charge types under which SPP or another centrally administered market (e.g., PJM or MISO) bills/credits a cost or revenue need not be detailed in Factors PP or OSSR for the costs or revenues to be considered specifically detailed in Factors PP or OSSR; and provided further, should the SPP or another centrally administered market (e.g. PJM or MISO) implement a new market settlement charge type not listed below or a new schedule not listed in TC:

- ~~A. The Company may include the new schedule, charge type cost or revenue in its FAR filings if the Company believes the new schedule, charge type cost or revenue possesses the characteristics of, and is of the nature of, the costs or revenues listed below or in the schedules listed in TC, as the case may be, subject to the requirement that the Company make a filing with the Commission as outlined in B below and also subject to another party's right to challenge the inclusion as outlined in E. below;~~
- ~~B. The Company will make a filing with the Commission giving the Commission notice of the new schedule or charge type no later than 60 days prior to the Company including the new schedule, charge type cost or revenue in a FAR filing. Such filing shall identify the proposed accounts affected by such change, provide a description of the new charge type demonstrating that it possesses the characteristics of, and is of the nature of, the costs or revenues listed in factors PP, TC or OSSR as the case may be, and identify the preexisting schedule, or market settlement charge type(s) which the new schedule or charge type replaces or supplements;~~
- ~~C. The Company will also provide notice in its monthly reports required by the Commission's fuel adjustment clause rules that identifies the new schedule, charge type costs or revenues by amount, description and location within the monthly reports;~~
- ~~D. The Company shall account for the new schedule, charge type costs or revenues in a manner which allows for the transparent determination of current period and cumulative costs or revenues;~~
- ~~E. If the Company makes the filing provided for in B above and a party challenges the inclusion, such challenge will not delay approval of the FAR filing. To challenge the inclusion of a new schedule or charge type, a party shall make a filing with the Commission based upon that party's contention that the new schedule, charge type costs or revenues at issue should not have been included, because they do not possess the characteristics of the schedules, costs or revenues listed in Factors PP, TC or OSSR, as the case may be. A party wishing to challenge the inclusion of a schedule or charge type shall include in its filing the reasons why it believes the Company did not show that the new schedule or charge type possesses the characteristics of the costs or revenues listed in Factors TC, PP or OSSR, as the case may be, and its filing shall be made within 30 days of the Company's filing under B above. In the event of a timely challenge, the Company shall bear the burden of proof to support its decision to include a new schedule or charge type in a FAR filing. Should such challenge be upheld by the Commission, any such costs will be refunded (or revenues retained) through a future FAR filing in a manner consistent with that utilized for Factor P; and~~
- ~~F. A party other than the Company may seek the inclusion of a new schedule or charge type in a FAR filing by making a filing with the Commission no less than 60 days before the Company's next FAR filing date of August 1 or February 1. Such a filing shall give the Commission notice that such party believes the new schedule or charge type should be included because it possesses the characteristics of, and is of the nature of, the costs or revenues listed in factors PP, TC or OSSR, as the case may be. The~~

~~party's filing shall identify the proposed accounts affected by such change, provide a description of the new schedule or charge type demonstrating that it possesses the characteristics of, and is of the nature of, the schedules, costs or revenues listed in factors PP, TC or OSSR as the case may be, and identify the preexisting schedule or market settlement charge type(s) which the new schedule or charge type replaces or supplements. If a party makes the filing provided for by this paragraph F and a party (including the Company) challenges the inclusion, such challenge will not delay inclusion of the new schedule or charge type in the FAR filing or delay approval of the FAR filing. To challenge the inclusion of a new schedule or charge type, the challenging party shall make a filing with the Commission based upon that party's contention that the new schedule or charge type costs or revenues at issue should not have been included, because they do not possess the characteristics of the schedules, costs or revenues listed in Factors PP, TC, or OSSR, as the case may be. The challenging party shall make its filing challenging the inclusion and stating the reasons why it believes the new schedule or charge type does not possess the characteristic of the costs or revenues listed in Factors PP, TC or OSSR, as the case may be, within 30 days of the filing that seeks inclusion of the new schedule or charge type. In the event of a timely challenge, the party seeking the inclusion of the new schedule or charge type shall bear the burden of proof to support its contention that the new schedule or charge type should be included in the Company's FAR filings. Should such challenge be upheld by the Commission, any such costs will be refunded (or revenues retained) through a future FAR filing in a manner consistent with that utilized for Factor P.~~

SPP IM charge/revenue types that are included in the FAC are listed below:

Day-Ahead Ramp Capability Up Amount

Day-Ahead Ramp Capability Down Amount

Day-Ahead Ramp Capability Up Distribution Amount

Day-Ahead Ramp Capability Down Distribution Amount

Day Ahead Regulation Down Service Amount

Day Ahead Regulation Down Service Distribution Amount

Day Ahead Regulation Up Service Amount

Day Ahead Regulation Up Service Distribution Amount

Day Ahead Spinning Reserve Amount

Day Ahead Spinning Reserve Distribution Amount

Day Ahead Supplemental Reserve Amount

Day Ahead Supplemental Reserve Distribution Amount

Real Time Contingency Reserve Deployment Failure Amount

Real Time Contingency Reserve Deployment Failure Distribution Amount

Real Time Ramp Capability Up Amount

Real Time Ramp Capability Down Amount

Real Time Ramp Capability Up Distribution Amount

Real Time Ramp Capability Down Distribution Amount

Real Time Ramp Capability Non-Performance Amount

Real Time Ramp Capability Non-Performance Distribution Amount

Real Time Regulation Service Deployment Adjustment Amount

Real Time Regulation Down Service Amount

Real Time Regulation Down Service Distribution Amount

Real Time Regulation Non-Performance

Real Time Regulation Non-Performance Distribution

Real Time Regulation Up Service Amount

Real Time Regulation Up Service Distribution Amount

Real Time Spinning Reserve Amount

Real Time Spinning Reserve Distribution Amount

Real Time Supplemental Reserve Amount

Real Time Supplemental Reserve Distribution Amount

Day Ahead Asset Energy

Day Ahead Non-Asset Energy

Day Ahead Virtual Energy Amount

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FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

- SPP IM charge/revenue types that are included in the FAC (continued)
- Real Time Asset Energy Amount
- Real Time Non-Asset Energy Amount
- Real Time Virtual Energy Amount
- Transmission Congestion Rights Funding Amount
- Transmission Congestion Rights Daily Uplift Amount
- Transmission Congestion Rights Monthly Payback Amount
- Transmission Congestion Rights Annual Payback Amount
- Transmission Congestion Rights Annual Closeout Amount
- Transmission Congestion Rights Auction Transaction Amount
- Auction Revenue Rights Funding Amount
- Auction Revenue Rights Uplift Amount
- Auction Revenue Rights Monthly Payback Amount
- Auction Revenue Annual Payback Amount
- Auction Revenue Rights Annual Closeout Amount
- ~~Day Ahead Virtual Energy Transaction Fee Amount~~
- Day Ahead Demand Reduction Amount
- Day Ahead Demand Reduction Distribution Amount
- Day Ahead Grandfathered Agreement Carve Out Daily Amount
- Grandfathered Agreement Carve Out Distribution Daily Amount
- Day Ahead Grandfathered Agreement Carve Out Monthly Amount
- Grandfathered Agreement Carve Out Distribution Monthly Amount
- Day Ahead Grandfathered Agreement Carve Out Yearly Amount
- Grandfathered Agreement Carve Out Distribution Yearly Amount
- Day Ahead Make Whole Payment Amount
- Day Ahead Make Whole Payment Distribution Amount
- Miscellaneous Amount
- Reliability Unit Commitment Make Whole Payment Amount
- Real Time Out of Merit Amount
- Reliability Unit Commitment Make Whole Payment Distribution Amount
- Over Collected Losses Distribution Amount
- Real Time Joint Operating Agreement Amount
- Real Time Reserve Sharing Group Amount
- Real Time Reserve Sharing Group Distribution Amount
- Real Time Demand Reduction Amount
- Real Time Demand Reduction Distribution Amount
- Day Ahead Combined Interest Resource Adjustment Amount
- Real Time Combined Interest Resource Adjustment Amount
- Integrated Marketplace Clearing Administration Service
- Integrated Marketplace Facilitation Administration Service
- Transmission Congestion Rights Administration Service
- Real Time Pseudo Tie Congestion Amount
- Real Time Pseudo Tie Losses Amount
- Unused Regulation Up Mileage Make Whole Payment Amount
- Unused Regulation Down Mileage Make Whole Payment Amount
- Revenue Neutrality Uplift Distribution Amount

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Should FERC require any item covered by components FC, E, PP, TC, OSSR or R to be recorded in an account different than the FERC accounts listed in such components, such items shall nevertheless be included in component FC, E, PP, TC, OSSR or R. In the month that the Company begins to record items in a different account, the Company will file with the Commission the previous account number, the new account number and what costs or revenues that flow through the Rider FAC to be recorded in the account.

B = Net base energy costs ordered by the Commission in the last general rate case consistent with the costs and revenues included in the calculation of the FPA. Net Base Energy costs will be calculated as shown below:

$$SAP \times \text{Base Factor ("BF")}$$

SAP = Net system input ("NSI") in kWh for the accumulation period excluding the energy used by customers served under the MKT Schedule.

BF = Company base factor costs per kWh: \$0.018244675

J = Missouri Retail Energy Ratio = (MO Retail kWh sales + MO Losses) / (MO Retail kWh Sales + MO Losses + KS Retail kWh Sales + KS Losses + Sales for Resale, Municipals kWh Sales [includes border customers] + Sales for Resale, Municipals Losses)
 MO Losses = 6.326.09%; KS Losses = 7.526.51%; Sales for Resale, Municipals Losses = 6.84%

T = True-up amount as defined below.

I = 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.

P = Prudence disallowance amount, if any, as defined in this tariff.

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FAR = FPA/S_{RP}

Single Accumulation Period Transmission Voltage FAR_{Trans} = FAR * VAF_{Trans}
 Single Accumulation Period Substation Voltage FAR_{Sub} = FAR * VAF_{Sub}
 Single Accumulation Period Primary Voltage FAR_{Prim} = FAR * VAF_{Prim}
 Single Accumulation Period Secondary Voltage FAR_{Sec} = FAR * VAF_{Sec}

Annual Primary Voltage FAR_{Trans} = Aggregation of the two Single Accumulation Period Transmission Voltage FARs still to be recovered
 Annual Primary Voltage FAR_{Sub} = Aggregation of the two Single Accumulation Period Substation Voltage FARs still to be recovered
 Annual Primary Voltage FAR_{Prim} = Aggregation of the two Single Accumulation Period Primary Voltage FARs still to be recovered
 Annual Secondary Voltage FAR_{Sec} = Aggregation of the two Single Accumulation Period Secondary Voltage FARs still to be recovered

Where:

FPA = Fuel and Purchased Power Adjustment

S_{RP} = Forecasted recovery period Missouri retail NSI in kWh, at the generation level excluding the energy used by customers served under the MKT Schedule.

VAF = Expansion factor by voltage level

- VAF_{Trans} = Expansion factor for transmission voltage level customers
- VAF_{Sub} = Expansion factor for substation to transmission voltage level customers
- VAF_{Prim} = Expansion factor for between primary and substation voltage level customers
- VAF_{Sec} = Expansion factor for lower than primary voltage customers

TRUE-UPS

After completion of each RP, the Company shall make a true-up filing by the filing date of its next FAR filing. Any true-up adjustments shall be reflected in component “T” above. Interest on the true-up adjustment will be included in component “I” above.

The true-up amount shall be the difference between the revenues billed and the revenues authorized for collection during the RP as well as any corrections identified to be included in the current FAR filing. Any corrections included will be discussed in the testimony accompanying the true-up filing.

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

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For Missouri Retail Service Area

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PRUDENCE REVIEWS

Prudence reviews of the costs subject to this Rider FAC shall occur no less frequently than every eighteen months, and any such costs which are determined by the Commission to have been imprudently incurred or incurred in violation of the terms of this Rider FAC shall be returned to customers. Adjustments by Commission order, if any, pursuant to any prudence review shall be included in the FAR calculation in component “P” above unless a separate refund is ordered by the Commission. Interest on the prudence adjustment will be included in component “I” above.

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For Missouri Retail Service Area

FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC
 (Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)

| | | | |
|-----------------------------|--|---|-----------|
| Accumulation Period Ending: | | | |
| 1 | Actual Net Energy Cost (ANEC) = (FC+E+PP+TC-OSSR-R-Rev) | | |
| 2 | Net Base Energy Cost (B) | - | |
| | 2.1 Base Factor (BF) | | \$0.01824 |
| | 2.2 Accumulation Period NSI (S _{AP}) | | |
| 3 | (ANEC-B) | | |
| 4 | Jurisdictional Factor (J) | x | |
| 5 | (ANEC-B)*J | | |
| 6 | Customer Responsibility | x | |
| 7 | 95% *((ANEC-B)*J) | | |
| 8 | True-Up Amount (T) | + | |
| 9 | Interest (I) | + | |
| 10 | Prudence Adjustment Amount (P) | + | |
| 11 | Fuel and Purchased Power Adjustment (FPA) | = | |
| 12 | Estimated Recovery Period Retail NSI (S _{RP}) | ÷ | |
| 13 | Current Period Fuel Adjustment Rate (FAR) | = | |
| 14 | | | |
| 15 | Current Period FAR _{Trans} = FAR x VAF _{Trans} | | |
| 16 | Prior Period FAR _{Trans} | + | |
| 17 | Current Annual FAR _{Trans} | = | |
| 18 | | | |
| 19 | Current Period FAR _{Sub} = FAR x VAF _{Sub} | | |
| 20 | Prior Period FAR _{Sub} | + | |
| 21 | Current Annual FAR _{Sub} | = | |
| 22 | | | |
| 23 | Current Period FAR _{Prim} = FAR x VAF _{Prim} | | |
| 24 | Prior Period FAR _{Prim} | + | |
| 25 | Current Annual FAR _{Prim} | = | |
| 26 | | | |
| 27 | Current Period FAR _{Sec} = FAR x VAF _{Sec} | | |
| 28 | Prior Period FAR _{Sec} | + | |
| 29 | Current Annual FAR _{Sec} | = | |
| 30 | VAF _{Trans} = 1.0300 | | |
| 31 | VAF _{Sub} = 1.0378 | | |
| 32 | VAF _{Prim} = 1.0497 | | |
| 33 | VAF _{Sec} = 1.0690 | | |

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(Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)

DEFINITIONS

ACCUMULATION PERIODS, FILING DATES AND RECOVERY PERIODS: An accumulation period is the six calendar months during which the actual costs and revenues subject to this rider will be accumulated for the purposes of determining the Fuel Adjustment Rate (“FAR”). The two six-month accumulation periods each year through four years from the effective date of this tariff sheet, the two corresponding twelve-month recovery periods and the filing dates are as shown below. Each filing shall include detailed work papers in electronic format with formulas intact to support the filing.

| <u>Accumulation Periods</u> | <u>Filing Dates</u> | <u>Recovery Periods</u> |
|-----------------------------------|------------------------------|--------------------------------------|
| January – June July – December | By August 1 By February 1 | October – September April – March |

A recovery period consists of the months during which the FAR is applied to retail customer billings on a per kilowatt-hour (kWh) basis.

COSTS AND REVENUES: Costs eligible for the Fuel and Purchased Power Adjustment (“FPA”) will be the Company’s allocated jurisdictional costs for the fuel component of the Company’s generating units, purchased power energy charges including applicable Southwest Power Pool (“SPP”) charges, emission allowance costs and amortizations, cost of transmission of electricity by others associated with purchased power and off-system sales, and the costs described below associated with the Company’s hedging programs – all as incurred during the accumulation period. These costs will be offset by jurisdictional off-system sales revenues, applicable SPP revenues, revenue from the sale of Renewable Energy Certificates or Credits (“REC”) and retail revenues associated with specific customer programs identified. Eligible costs do not include the purchased power demand costs associated with purchased power contracts in excess of one year or costs associated with service provided to customers taking energy through Schedule MKT. Likewise, revenues do not include demand or capacity receipts associated with power contracts in excess of one year.

APPLICABILITY

The price per kWh of electricity sold to retail customers not served under Schedule MKT will be adjusted (up or down) in April and October subject to application of the Rider FAC and approval by the Missouri Public Service Commission (“MPSC” or “Commission”).

The FAR is the result of dividing the FPA by forecasted Missouri retail net system input (“SRP”) for the recovery period, expanded for Voltage Adjustment Factors (“VAF”), rounded to the nearest \$0.00001, and aggregating over two accumulation periods. The amount charged on a separate line on retail customers’ bills is equal to the current annual FAR multiplied by kWh billed.

P.S.C. MO. No. 7

Original Sheet No. 50.33

Canceling P.S.C. MO. No. _____

Sheet No. _____

For Missouri Retail Service Area

FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC
 (Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)

FORMULAS AND DEFINITIONS OF COMPONENTS

FPA = $95\% * ((ANEC - B) * J) + T + I + P$

ANEC = Actual Net Energy Costs = $(FC + E + PP + TC - OSSR - R - REV)$

FC = Fuel costs Incurred to support sales:
 The following costs reflected in Federal Energy Regulatory Commission (“FERC”) Account Number 501:

Subaccount 501000: coal commodity and transportation, side release and freeze conditioning agents, dust mitigation agents, applicable taxes, accessorial charges as delineated in railroad accessorial tariffs [additional crew, closing hopper railcar doors, completion of loading of a unit train and its release for movement, completion of unloading of a unit train and its release for movement, delay for removal of frozen coal, destination detention, diversion of empty unit train (including administration fee, holding charges, and out-of-route charges which may include fuel surcharge), diversion of loaded coal trains, diversion of loaded unit train fees (including administration fee, additional mileage fee or out-of-route charges which may include fuel surcharge), fuel surcharge, held in transit, hold charge, locomotive release, miscellaneous handling of coal cars, origin detention, origin re-designation, out-of-route charges (including fuel surcharge), out-of-route movement, pick-up of locomotive power, placement and pick-up of loaded or empty private coal cars on railroad supplied tracks, placement and pick-up of loaded or empty private coal cars on shipper supplied tracks, railcar storage, release of locomotive power, removal, rotation and/or addition of cars, storage charges, switching, trainset positioning, trainset storage, and weighing], unit train maintenance, leases, taxes and depreciation, natural gas costs including reservation charges, fuel quality adjustments, fuel hedging costs, fuel adjustments included in commodity and transportation costs, broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers) and margins (cash or collateral used to secure or maintain the Company’s hedge position with a brokerage or exchange), oil costs for commodity, transportation, storage, taxes, fees, and fuel losses, coal and oil inventory adjustments, and insurance recoveries, subrogation recoveries and settlement proceeds for increased fuel expenses in the 501 Accounts.

Subaccount 501020: the allocation of the allowed costs in the 501000, 501300, 501400 and 501420 accounts attributed to native load;

Subaccount 501030: the allocation of the allowed costs in the 501000, 501300, 501400 and 501420 accounts attributed to off system sales;

Subaccount 501300: fuel additives and consumable costs for Air Quality Control Systems (“AQCS”) operations, such as ammonia, hydrated lime, lime, limestone, limestone inventory adjustments, powder activated carbon, calcium bromide, sulfur, and RESPond, or other consumables which perform similar functions;

Subaccount 501400 and 501420: residuals costs and revenues associated with combustion byproducts, slag and ash disposal costs and revenues including contractors, materials and other miscellaneous expenses.

The following costs reflected in FERC Account Number 518:

Subaccount 518000: nuclear fuel commodity and hedging costs; insurance recoveries, subrogation recoveries and settlement proceeds for increased fuel expenses in the 518 Accounts

Subaccount 518201: nuclear fuel waste disposal expense;

Subaccount 518100: nuclear fuel oil.

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Original Sheet No. 50.34

Canceling P.S.C. MO. No. _____

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For Missouri Retail Service Area

FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC
(Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)

FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

The following costs reflected in FERC Account Number 547:

Subaccount 547000: natural gas and oil costs for commodity, transportation, storage, taxes, fees and fuel losses, hedging costs for natural gas, oil, and natural gas used to cross-hedge purchased power or sales, and settlement proceeds, insurance recoveries, subrogation recoveries for increased fuel expenses, broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers), and margins (cash or collateral used to secure or maintain the Company's hedge position with a brokerage or exchange);

Subaccount 547020: the allocation of the allowed costs in the 547000 and 547300 accounts attributed to native load;

Subaccount 547027: natural gas reservation charges;

Subaccount 547030: the allocation of the allowed costs in the 547000 and 547300 accounts attributed to off system sales;

Subaccount 547300: fuel additives and consumable costs for Air Quality Control Systems ("AQCS") operations, such as ammonia or other consumables which perform similar functions.

E = Net Emission Costs:

The following costs and revenues reflected in FERC Account Number 509:

Subaccount 509000: NO_x and SO₂ emission allowance costs and revenue amortizations offset by revenues from the sale of NO_x and SO₂ emission allowances including any associated hedging costs, broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers) and margins (cash or collateral used to secure or maintain the Company's hedge position with a brokerage or exchange).

PP = Purchased Power Costs:

The following costs or revenues reflected in FERC Account Number 555:

Subaccount 555000: purchased power costs, energy charges from capacity purchases of any duration, insurance recoveries, and subrogation recoveries for purchased power expenses, hedging costs including broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers) and margins (cash or collateral used to secure or maintain the Company's hedge position with a brokerage or exchange), charges and credits related to the SPP Integrated Marketplace ("IM") or other IMs, including energy, revenue neutrality, make whole and out of merit payments and distributions, over collected losses payments and distributions, Transmission Congestion Rights ("TCR") and Auction Revenue Rights ("ARR") settlements, virtual energy costs, revenues and related fees where the virtual energy transaction is a hedge in support of physical operations related to a generating resource or load, load/export charges, ancillary services including non-performance and distribution payments and charges and other miscellaneous SPP Integrated Market charges including uplift charges or credits,

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FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC
(Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)

FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

PP = Purchased Power Costs (continued):

excluding (1) the amounts associated with purchased power agreements associated with the Renewable Energy Rider tariff (2) amounts associated with the purchase of power for customers served under the MKT Schedule and (3) the Missouri allocated portion of the difference between the amount of the bilateral contract for hydro energy purchased from CNPPID and the average monthly LMP value at the CNPPID nodes times the amount of energy sold to the SPP at the CNPPID nodes. The CNPPID nodes are defined as NPPD.KCPL.JFY1, NPPD.KCPL.JFY2, NPPD.KCPL.JHN1, NPPD.KCPL.JN11, NPPD.KCPL.JN12;

Subaccount 555005: capacity charges for capacity purchases one year or less in duration;

Subaccount 555030: the allocation of the allowed costs in the 555000 account attributed to purchases for off system sales.

Subaccount 555070: SPP purchased power administration fees.

TC = Transmission Costs:

The following costs reflected in FERC Account Number 565:

Subaccount 565000: non-SPP transmission used to serve off system sales or to make purchases for load and 7.18% of the SPP transmission service costs which includes the schedules listed below as well as any adjustment to the charges in the schedules below:

- Schedule 7 – Long Term Firm and Short Term Point to Point Transmission Service
- Schedule 8 – Non Firm Point to Point Transmission Service
- Schedule 9 – Network Integration Transmission Service
- Schedule 10 – Wholesale Distribution Service
- Schedule 11 – Base Plan Zonal Charge and Region Wide Charge

excluding amounts associated with portions of purchased power agreements dedicated to specific customers under the Renewable Energy Rider tariff.

Subaccount 565020: the allocation of the allowed costs in the 565000 account attributed to native load;

Subaccount 565027: the allocation of the allowed costs in the 565000 account attributed to transmission demand charges;

Subaccount 565030: the allocation of the allowed costs in the 565000 account attributed to off system sales.

FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC
 (Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)

FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

- OSSR = Revenues from Off-System Sales:
 The following revenues or costs reflected in FERC Account Number 447:
 Subaccount 447020: all revenues from off-system sales. This includes charges and credits related to the SPP IM, or other IMs, including, energy, ancillary services, revenue sufficiency (such as make whole payments and out of merit payments and distributions), revenue neutrality payments and distributions, over collected losses payments and distributions, TCR and ARR settlements, demand reductions, virtual energy costs and revenues and related fees where the virtual energy transaction is a hedge in support of physical operations related to a generating resource or load, generation/export charges, ancillary services including non-performance and distribution payments and SPP uplift revenues or credits, hedging costs, but excluding (1) off-system sales revenues from full and partial requirements sales to municipalities that are served through bilateral contracts in excess of one year and (2) the amounts associated with purchased power agreements associated with the Renewable Energy Rider tariff. Additional revenue will be added at an imputed 75% of the unsubscribed portion associated with the Solar Subscription Rider valued at market price. For future solar subscription projects, additional revenue will be added at an imputed 100% of the unsubscribed portion up to 50%;
 Subaccount 447012: capacity charges for capacity sales one year or less in duration;
 Subaccount 447030: the allocation of the includable sales in account 447020 not attributed to retail sales.
- R = Renewable Energy Credit Revenue:
 Revenues reflected in FERC account 509000 and gains or losses to be recorded in FERC accounts 411800 and 411900 from the sale of RECs that are not needed to meet the Missouri Renewable Energy Standards less the cost associated with making the sale.

 Revenues from excess RECs sold for the benefit of specific tariff participation less the cost associated with making the sale. Any costs to purchase RECs for the Business EV Charging Service Carbon Free Energy Option recorded in FERC account 509000 including the NAR fees incurred to administer these programs.
- Rev = Retail revenues in accounts 440 - 442, resources XXXX and XXXX associated with the low-income solar subscription and the Business EV Charging Service Carbon Free Energy Option, less the costs of retiring the RECs for these programs.

Any cost identified above which is a Missouri-only cost shall be grossed up by the current kWh energy factor, included in the ANEC calculation and allocated as indicated in component J below. Any cost identified above which is a Kansas-only cost shall be excluded from the ANEC calculation.

Hedging costs are defined as realized losses and costs (including broker commissions, fees, and margins) minus realized gains associated with mitigating volatility in the Company's cost of fuel, fuel additives, fuel transportation, emission allowances, transmission and power purchases or sales, including but not limited to, the Company's use of derivatives whether over-the counter or exchange traded including, without limitation, futures or forward contracts, puts, calls, caps, floors, collars, swaps, TCRs, virtual energy transactions, or similar instruments.

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FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC
 (Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)

FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

Costs and revenues not specifically detailed in Factors FC, PP, E, TC, OSSR, or R shall not be included in the Company's FAR filings; provided however, in the case of Factors PP, TC or OSSR, the market settlement charge types under which SPP or another centrally administered market (e.g., PJM or MISO) bills/credits a cost or revenue need not be detailed in Factors PP or OSSR for the costs or revenues to be considered specifically detailed in Factors PP or OSSR; and provided further, should the SPP or another centrally administered market (e.g. PJM or MISO) implement a new market settlement charge type not listed below or a new schedule not listed in TC:

SPP IM charge/revenue types that are included in the FAC are listed below:

- Day-Ahead Ramp Capability Up Amount
- Day-Ahead Ramp Capability Down Amount
- Day-Ahead Ramp Capability Up Distribution Amount
- Day-Ahead Ramp Capability Down Distribution Amount
- Day Ahead Regulation Down Service Amount
- Day Ahead Regulation Down Service Distribution Amount
- Day Ahead Regulation Up Service Amount
- Day Ahead Regulation Up Service Distribution Amount
- Day Ahead Spinning Reserve Amount
- Day Ahead Spinning Reserve Distribution Amount
- Day Ahead Supplemental Reserve Amount
- Day Ahead Supplemental Reserve Distribution Amount
- Real Time Contingency Reserve Deployment Failure Amount
- Real Time Contingency Reserve Deployment Failure Distribution Amount
- Real Time Ramp Capability Up Amount
- Real Time Ramp Capability Down Amount
- Real Time Ramp Capability Up Distribution Amount
- Real Time Ramp Capability Down Distribution Amount
- Real Time Ramp Capability Non-Performance Amount
- Real Time Ramp Capability Non-Performance Distribution Amount
- Real Time Regulation Service Deployment Adjustment Amount
- Real Time Regulation Down Service Amount
- Real Time Regulation Down Service Distribution Amount
- Real Time Regulation Non-Performance
- Real Time Regulation Non-Performance Distribution
- Real Time Regulation Up Service Amount
- Real Time Regulation Up Service Distribution Amount
- Real Time Spinning Reserve Amount
- Real Time Spinning Reserve Distribution Amount
- Real Time Supplemental Reserve Amount
- Real Time Supplemental Reserve Distribution Amount
- Day Ahead Asset Energy
- Day Ahead Non-Asset Energy
- Day Ahead Virtual Energy Amount

P.S.C. MO. No. 7

Original Sheet No. 50.38

Canceling P.S.C. MO. No. _____

Sheet No. _____

For Missouri Retail Service Area

FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC
 (Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)

FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

SPP IM charge/revenue types that are included in the FAC (continued)

- Real Time Asset Energy Amount
- Real Time Non-Asset Energy Amount
- Real Time Virtual Energy Amount
- Transmission Congestion Rights Funding Amount
- Transmission Congestion Rights Daily Uplift Amount
- Transmission Congestion Rights Monthly Payback Amount
- Transmission Congestion Rights Annual Payback Amount
- Transmission Congestion Rights Annual Closeout Amount
- Transmission Congestion Rights Auction Transaction Amount
- Auction Revenue Rights Funding Amount
- Auction Revenue Rights Uplift Amount
- Auction Revenue Rights Monthly Payback Amount
- Auction Revenue Annual Payback Amount
- Auction Revenue Rights Annual Closeout Amount
- Day Ahead Demand Reduction Amount
- Day Ahead Demand Reduction Distribution Amount
- Day Ahead Grandfathered Agreement Carve Out Daily Amount
- Grandfathered Agreement Carve Out Distribution Daily Amount
- Day Ahead Grandfathered Agreement Carve Out Monthly Amount
- Grandfathered Agreement Carve Out Distribution Monthly Amount
- Day Ahead Grandfathered Agreement Carve Out Yearly Amount
- Grandfathered Agreement Carve Out Distribution Yearly Amount
- Day Ahead Make Whole Payment Amount
- Day Ahead Make Whole Payment Distribution Amount
- Miscellaneous Amount
- Reliability Unit Commitment Make Whole Payment Amount
- Real Time Out of Merit Amount
- Reliability Unit Commitment Make Whole Payment Distribution Amount
- Over Collected Losses Distribution Amount
- Real Time Joint Operating Agreement Amount
- Real Time Reserve Sharing Group Amount
- Real Time Reserve Sharing Group Distribution Amount
- Real Time Demand Reduction Amount
- Real Time Demand Reduction Distribution Amount
- Day Ahead Combined Interest Resource Adjustment Amount
- Real Time Combined Interest Resource Adjustment Amount
- Integrated Marketplace Clearing Administration Service
- Integrated Marketplace Facilitation Administration Service
- Transmission Congestion Rights Administration Service
- Real Time Pseudo Tie Congestion Amount
- Real Time Pseudo Tie Losses Amount
- Unused Regulation Up Mileage Make Whole Payment Amount
- Unused Regulation Down Mileage Make Whole Payment Amount
- Revenue Neutrality Uplift Distribution Amount

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FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC
 (Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)

Should FERC require any item covered by components FC, E, PP, TC, OSSR or R to be recorded in an account different than the FERC accounts listed in such components, such items shall nevertheless be included in component FC, E, PP, TC, OSSR or R. In the month that the Company begins to record items in a different account, the Company will file with the Commission the previous account number, the new account number and what costs or revenues that flow through the Rider FAC to be recorded in the account.

B = Net base energy costs ordered by the Commission in the last general rate case consistent with the costs and revenues included in the calculation of the FPA. Net Base Energy costs will be calculated as shown below:

$$SAP \times \text{Base Factor ("BF")}$$

SAP = Net system input ("NSI") in kWh for the accumulation period excluding the energy used by customers served under the MKT Schedule.

BF = Company base factor costs per kWh: \$0.01824

J = Missouri Retail Energy Ratio = (MO Retail kWh sales + MO Losses) / (MO Retail kWh Sales + MO Losses + KS Retail kWh Sales + KS Losses + Sales for Resale, Municipals kWh Sales [includes border customers] + Sales for Resale, Municipals Losses)
 MO Losses = 6.09%; KS Losses = 6.51%; Sales for Resale, Municipals Losses = 6.84%

T = True-up amount as defined below.

I = 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.

P = Prudence disallowance amount, if any, as defined in this tariff.

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FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC
 (Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)

FAR = FPA/S_{RP}

Single Accumulation Period Transmission Voltage FAR_{Trans} = FAR * VAF_{Trans}
 Single Accumulation Period Substation Voltage FAR_{Sub} = FAR * VAF_{Sub}
 Single Accumulation Period Primary Voltage FAR_{Prim} = FAR * VAF_{Prim}
 Single Accumulation Period Secondary Voltage FAR_{Sec} = FAR * VAF_{Sec}

Annual Primary Voltage FAR_{Trans} = Aggregation of the two Single Accumulation Period Transmission Voltage FARs still to be recovered
 Annual Primary Voltage FAR_{Sub} = Aggregation of the two Single Accumulation Period Substation Voltage FARs still to be recovered
 Annual Primary Voltage FAR_{Prim} = Aggregation of the two Single Accumulation Period Primary Voltage FARs still to be recovered
 Annual Secondary Voltage FAR_{Sec} = Aggregation of the two Single Accumulation Period Secondary Voltage FARs still to be recovered

Where:

- FPA = Fuel and Purchased Power Adjustment
- S_{RP} = Forecasted recovery period Missouri retail NSI in kWh, at the generation level excluding the energy used by customers served under the MKT Schedule.
- VAF = Expansion factor by voltage level
- VAF_{Trans} = Expansion factor for transmission voltage level customers
 - VAF_{Sub} = Expansion factor for substation to transmission voltage level customers
 - VAF_{Prim} = Expansion factor for between primary and substation voltage level customers
 - VAF_{Sec} = Expansion factor for lower than primary voltage customers

TRUE-UPS

After completion of each RP, the Company shall make a true-up filing by the filing date of its next FAR filing. Any true-up adjustments shall be reflected in component “T” above. Interest on the true-up adjustment will be included in component “I” above.

The true-up amount shall be the difference between the revenues billed and the revenues authorized for collection during the RP as well as any corrections identified to be included in the current FAR filing. Any corrections included will be discussed in the testimony accompanying the true-up filing.

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

P.S.C. MO. No. 7 Original Sheet No. 50.41
Canceling P.S.C. MO. No. _____ Sheet No. _____
For Missouri Retail Service Area

FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC
(Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)

PRUDENCE REVIEWS

Prudence reviews of the costs subject to this Rider FAC shall occur no less frequently than every eighteen months, and any such costs which are determined by the Commission to have been imprudently incurred or incurred in violation of the terms of this Rider FAC shall be returned to customers. Adjustments by Commission order, if any, pursuant to any prudence review shall be included in the FAR calculation in component “P” above unless a separate refund is ordered by the Commission. Interest on the prudence adjustment will be included in component “I” above.

FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC
 (Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)

| | | | |
|-----------------------------|--|---|-----------|
| Accumulation Period Ending: | | | |
| 1 | Actual Net Energy Cost (ANEC) = (FC+E+PP+TC-OSSR-R-Rev) | | |
| 2 | Net Base Energy Cost (B) | - | |
| | 2.1 Base Factor (BF) | | \$0.01824 |
| | 2.2 Accumulation Period NSI (S _{AP}) | | |
| 3 | (ANEC-B) | | |
| 4 | Jurisdictional Factor (J) | x | |
| 5 | (ANEC-B)*J | | |
| 6 | Customer Responsibility | x | |
| 7 | 95% *((ANEC-B)*J) | | |
| 8 | True-Up Amount (T) | + | |
| 9 | Interest (I) | + | |
| 10 | Prudence Adjustment Amount (P) | + | |
| 11 | Fuel and Purchased Power Adjustment (FPA) | = | |
| 12 | Estimated Recovery Period Retail NSI (S _{RP}) | ÷ | |
| 13 | Current Period Fuel Adjustment Rate (FAR) | = | |
| 14 | | | |
| 15 | Current Period FAR _{Trans} = FAR x VAF _{Trans} | | |
| 16 | Prior Period FAR _{Trans} | + | |
| 17 | Current Annual FAR _{Trans} | = | |
| 18 | | | |
| 19 | Current Period FAR _{Sub} = FAR x VAF _{Sub} | | |
| 20 | Prior Period FAR _{Sub} | + | |
| 21 | Current Annual FAR _{Sub} | = | |
| 22 | | | |
| 23 | Current Period FAR _{Prim} = FAR x VAF _{Prim} | | |
| 24 | Prior Period FAR _{Prim} | + | |
| 25 | Current Annual FAR _{Prim} | = | |
| 26 | | | |
| 27 | Current Period FAR _{Sec} = FAR x VAF _{Sec} | | |
| 28 | Prior Period FAR _{Sec} | + | |
| 29 | Current Annual FAR _{Sec} | = | |
| 30 | VAF _{Trans} = 1.0300 | | |
| 31 | VAF _{Sub} = 1.0378 | | |
| 32 | VAF _{Prim} = 1.0497 | | |
| 33 | VAF _{Sec} = 1.0690 | | |

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

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

Original Sheet No. 127.24
Sheet No. _____

For Missouri Retail Service Area

**FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE
(Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)**

DEFINITIONS

ACCUMULATION PERIODS, FILING DATES AND RECOVERY PERIODS:

An accumulation period is the six calendar months during which the actual costs and revenues subject to this rider will be accumulated for the purposes of determining the Fuel Adjustment Rate (“FAR”). The two six-month accumulation periods each year through four years from the effective date of this tariff sheet, the two corresponding twelve-month recovery periods and the filing dates will be as shown below. Each filing shall include detailed work papers in electronic format to support the filing.

Accumulation Periods

June – November
December – May

Filing Dates

By January 1
By July 1

Recovery Periods

March – February
September – August

A recovery period consists of the months during which the FAR is applied to customer billings on a per kilowatt-hour (kWh) basis.

COSTS AND REVENUES:

Costs eligible for the Fuel and Purchased Power Adjustment (“FPA”) will be the Company’s allocated Jurisdictional costs for the fuel component of the Company’s generating units, reservation charges, purchased power energy charges including applicable Southwest Power Pool (“SPP”) charges, emission allowance costs and amortizations, cost of transmission of electricity by others associated with purchased power and off-system sales, and the cost described below associated with the company’s hedging programs all as incurred during the accumulation period. These costs will be offset by jurisdictional off-system sales revenues, applicable SPP revenues, and revenue from the sale of Renewable Energy Certificates or Credits (“REC”) and retail revenues associated with specific customer programs identified. Eligible costs do not include the purchased power demand costs associated with purchased power contracts in excess of one year or costs associated with service provided to customers taking energy through Schedule MKT. Likewise, revenues do not include demand or capacity receipts associated with power contracts in excess of one year.

APPLICABILITY

The price per kWh of electricity sold to retail customers not served under Schedule MKT will be adjusted (up or down) periodically in March and September subject to application of the Rider FAC and approval by the Missouri Public Service Commission (“MPSC” or “Commission”).

The FAR is the result of dividing the FPA by forecasted Missouri retail net system input (“SRP”) for the recovery period, expanded for Voltage Adjustment Factors (“VAF”), rounded to the nearest \$0.00001, and aggregated over two accumulation periods. The amount charged on a separate line on retail customers’ bills is equal to the current annual FAR multiplied by kWh billed.

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

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

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Sheet No. _____

For Missouri Retail Service Area

FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE
(Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)

FORMULAS AND DEFINITIONS OF COMPONENTS

FPA = $95\% * ((ANEC - B) * J) + T + I + P$

ANEC = Actual Net Energy Costs = $(FC + E + PP + TC - OSSR - R - Rev)$

FC = Fuel ~~c~~Costs Incurred to ~~s~~Support ~~s~~Sales:

The following costs reflected in Federal Energy Regulatory Commission ("FERC") Account Number 501:

Subaccount 501000: coal commodity and transportation, side release and freeze conditioning agents, dust mitigation agents, accessorial charges as delineated in railroad accessorial tariffs [additional crew, closing hopper railcar doors, completion of loading of a unit train and its release for movement, completion of unloading of a unit train and its release for movement, delay for removal of frozen coal, destination detention, diversion of empty unit train (including administration fee, holding charges, and out-of-route charges which may include fuel surcharge), diversion of loaded coal trains, diversion of loaded unit train fees (including administration fee, additional mileage fee or out-of-route charges which may include fuel surcharge), fuel surcharge, held in transit, hold charge, locomotive release, miscellaneous handling of coal cars, origin detention, origin re-designation, out-of-route charges (including fuel surcharge), out-of-route movement, pick-up of locomotive power, placement and pick-up of loaded or empty private coal cars on railroad supplied tracks, placement and pick-up of loaded or empty private coal cars on shipper supplied tracks, railcar storage, release of locomotive power, removal, rotation and/or addition of cars, storage charges, switching, trainset positioning, trainset storage, and weighing], unit train maintenance, leases, depreciation and applicable taxes, natural gas costs including reservation charges, fuel quality adjustments, fuel hedging costs, fuel adjustments included in commodity and transportation costs, broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers), and margins (cash or collateral used to secure or maintain the Company's hedge position with a brokerage or exchange), oil costs for commodity, propane costs, storage, taxes, fees, and fuel losses, coal and oil inventory adjustments, and insurance recoveries, subrogation recoveries and settlement proceeds for fuel expenses in the 501 Accounts. Subaccount 501020: the allocation of the allowed costs in the 501000, 501300, 501400 and 501420 accounts attributed to native load; Subaccount 501030: the allocation of the allowed costs in the 501000, 501300, 501400 and 501420 accounts attributed to off-system sales; Subaccount 501300: fuel additives and consumable costs for Air Quality Control Systems ("AQCS") operations, such as ammonia, hydrated lime, lime, limestone, limestone inventory adjustment, powder activated carbon, urea, propane, sodium bicarbonate, calcium bromide, sulfur, and RESPond, or other consumables which perform similar functions; Subaccount 501400 and 501420: residual costs and revenues associated with combustion byproducts, slag and ash disposal costs and revenues including contractors, materials and other miscellaneous expenses.

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

P.S.C. MO. No. 1

Original Sheet No. 127.26

Canceling P.S.C. MO. No. _____

Sheet No. _____

For Missouri Retail Service Area

FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE
(Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)

FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

The following costs reflected in FERC Account Number 547:

Subaccount 547000: natural gas and oil costs for commodity, transportation, capacity, broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers), storage, taxes, fees and fuel losses, hedging costs for natural gas, oil, and natural gas used to cross-hedge purchase power for sales, and settlement proceeds, insurance recoveries, subrogation recoveries for fuel expenses, and broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers), and margins (cash or collateral used to secure or maintain the Company's hedge position with a brokerage or exchange).

Subaccount 547020: the allocation of the allowed costs in the 547000 and 547300 accounts attributed to native load;

Subaccount 547027: natural gas reservation charges;

Subaccount 547030: the allocation of the allowed costs in the 547000 and 547300 accounts attributed to off-system sales;

Subaccount 547300: fuel additives and consumable costs for Air Quality Control Systems ("AQCS") operations, such as ammonia or other consumables which perform similar functions.

E = Net Emission Costs:
The following costs and revenues reflected in FERC Account Number 509:

Subaccount 509000: NOx and SO₂ emission allowance costs, including any associated hedging costs, and broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers) offset by revenue amortizations and revenues from the sale of NOx and SO₂ emission allowances, allowance and margins (cash or collateral used to secure or maintain the Company's hedge position with a brokerage or exchange)

PP = Purchased Power Costs:
The following costs or revenues reflected in FERC Account Number 555:

Subaccount 555005: capacity charges for capacity purchases one year or less in duration;

Subaccount 555000: purchased power costs, energy charges from capacity purchases, insurance recoveries, and subrogation recoveries for purchased power expenses, hedging costs including broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers), and and margins (cash or collateral used to secure or maintain the Company's hedge position with a brokerage or exchange), charges and credits related to the SPP Integrated Marketplace ("IM") or other IMs, including energy, revenue neutrality, make whole and

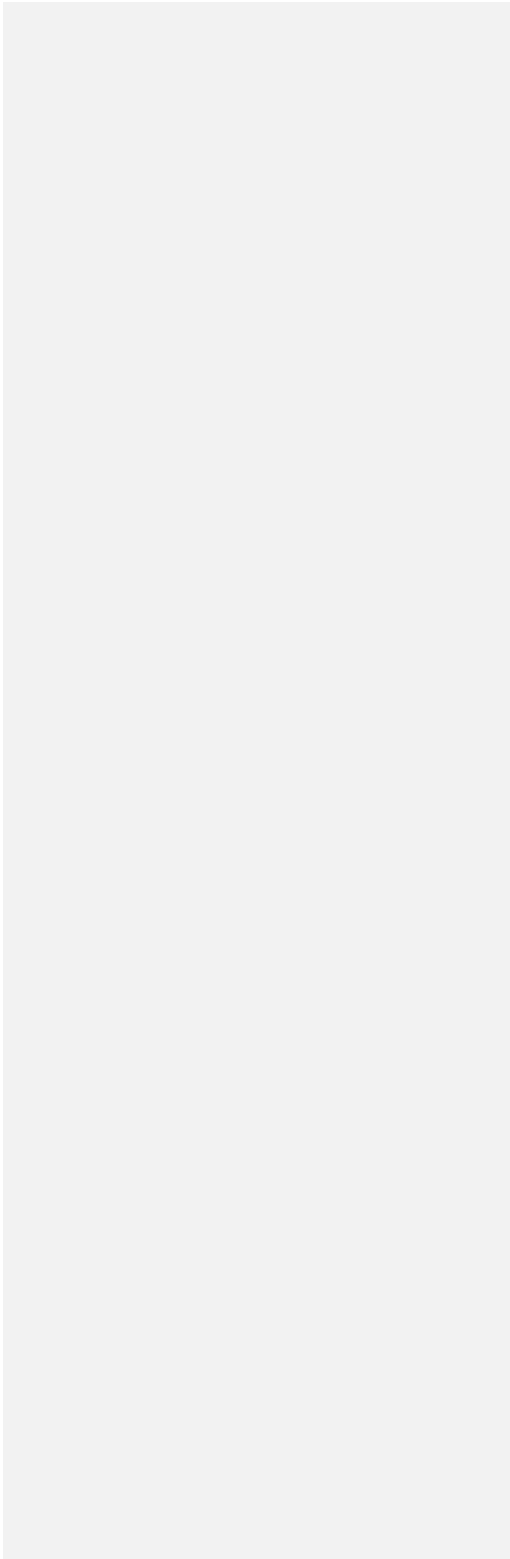
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FUEL ADJUSTMENT CLAUSE – Rider FAC
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FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

PP = Purchased power Costs (continued):

out of merit payments and distributions, over collected losses payments and distributions, Transmission Congestion Rights (“TCR”) and Auction Revenue Rights (“ARR”) settlements, virtual energy costs, revenues and related fees where the virtual energy transaction is a hedge in support of physical operations related to a generating resource or load, load/export charges, ancillary services including non-performance and distribution payments and charges and other miscellaneous SPP Integrated Market charges including uplift charges or credits, excluding (1) the amounts associated with purchased power agreements associated with the Renewable Energy Rider tariff and (2) amounts associated with the purchase of power for customers served under the MKT Schedule.

Subaccount 555030: the allocation of the allowed costs in the 555000 account attributed to purchases for off-system sales;

Subaccount 555035: purchased power costs associated with the WAPA agreement.
Subaccount 555070: SPP purchased power administration fees.

TC = Transmission Costs:

The following costs reflected in FERC Account Number 565:

Subaccount 565000: non-SPP transmission used to serve off-system sales or to make purchases for load, excluding any transmission costs associated with the Crossroads Power Plant and 43.0047.29% of the SPP transmission service costs which includes the schedules listed below as well as any adjustments to the charges in the schedules below:

- Schedule 7 – Long Term Firm and Short Term Point to Point Transmission Service
- Schedule 8 – Non Firm Point to Point Transmission Service
- Schedule 9 – Network Integration Transmission Service
- Schedule 10 – Wholesale Distribution Service
- Schedule 11 – Base Plan Zonal Charge and Region Wide Charge

excluding amounts associated with portions of purchased power agreements dedicated to specific customers under the Renewable Energy Rider tariff.

Subaccount 565020: the allocation of the allowed costs in the 565000 account attributed to native load;

Subaccount 565027: the allocation of the allowed costs in the 565000 account attributed to transmission demand charges;

Subaccount 565030: the allocation of the allowed costs in account 565000 attributed to off-system sales.

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

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For Missouri Retail Service Area

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FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

OSSR = Revenues from Off-System Sales:
The following revenues or costs reflected in FERC Account Number 447:

Subaccount 447020: all revenues from off-system sales. ~~This includes charges and credits related to the SPP IM. This includes charges and credits related to the SPP IM, or other IMs, including, energy, ancillary services, revenue sufficiency (such as make whole payments and out of merit payments and distributions), revenue neutrality payments and distributions, over collected losses payments and distributions, TCR and ARR settlements, demand reductions, virtual energy costs and revenues and related fees where the virtual energy transaction is a hedge in support of physical operations related to a generating resource or load, generation/export charges, ancillary services including non-performance and distribution payments and SPP uplift revenues or credits, hedging costs,~~ excluding (1) the amounts associated with purchased power agreements associated with the Renewable Energy Rider tariff, and (2) off-system sales revenues from full and partial requirements sales to municipalities that are served through bilateral contracts in excess of one year. Additional revenue will be added at an imputed 75% of the unsubscribed portion associated with the Solar Subscription Rider valued at market price. ~~For future solar subscription projects, additional revenue will be added at an imputed 100% of the unsubscribed portion up to 50%;~~

Subaccount 447012: capacity charges for capacity sales;
Subaccount 447030: the allocation of the includable sales in account 447020 not attributed to retail sales.
Subaccount 447035: the off-systems sales revenues associated with the WAPA agreement.

R = Renewable Energy Credit Revenue:
Revenues reflected in FERC account 509000 ~~and gains and losses to be recorded in FERC accounts 411800 and 411900~~ from the sale of ~~Renewable Energy Credits (RECs)~~ that are not needed to meet the Missouri Renewable Energy Standards ~~less the cost associated with making the sale.~~

~~Revenues from excess RECs sold for the benefit of specific tariff participation less the cost associated with making the sale. Any costs to purchase RECs for the Business EV Charging Service Carbon Free Energy Option recorded in FERC account 509000 including the NAR fees incurred to administer these programs.~~

Rev = ~~Retail revenues in accounts 440 – 442, resources XXXX and XXXX associated with the low-income solar subscription project and the Business EV Charging Service Carbon Free Energy Option, less the costs of retiring the RECs for these programs.~~

~~Hedging costs are defined as realized losses and costs (including broker commissions, fees, and margins) minus realized gains associated with mitigating volatility in the Company's cost of fuel, fuel additives, fuel transportation, emission allowances, transmission and power purchases or sales, including but not limited to, the Company's use of derivatives whether over-the counter or exchange traded including, without limitation, futures or forward contracts, puts, calls, caps, floors, collars, swaps, TCRs, virtual energy transactions, or similar instruments~~

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FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

Costs and revenues not specifically detailed in Factors FC, PP, E, TC, OSSR, or R shall not be included in the Company's FAR filings; provided however, in the case of Factors PP, TC or OSSR, the market settlement charge types under which SPP or another centrally administered market (e.g., PJM or MISO) bills/credits a cost or revenue need not be detailed in Factors PP or OSSR for the costs or revenues to be considered specifically detailed in Factors PP or OSSR; and provided further, should the SPP or another centrally administered market (e.g. PJM or MISO) implement a new market settlement charge type not listed below or a new schedule not listed in TC:

~~A. The Company may include the new schedule, charge type cost or revenue in its FAR filings if the Company believes the new schedule, charge type cost or revenue possesses the characteristics of, and is of the nature of, the costs or revenues listed below or in the schedules listed in TC, as the case may be, subject to the requirement that the Company make a filing with the Commission as outlined in B below and also subject to another party's right to challenge the inclusion as outlined in E. below;~~

~~B. The Company will make a filing with the Commission giving the Commission notice of the new schedule or charge type no later than 60 days prior to the Company including the new schedule, charge type cost or revenue in a FAR filing. Such filing shall identify the proposed accounts affected by such change, provide a description of the new charge type demonstrating that it possesses the characteristics of, and is of the nature of, the costs or revenues listed in factors PP, TC or OSSR as the case may be, and identify the preexisting schedule, or market settlement charge type(s) which the new schedule or charge type replaces or supplements;~~

~~C. The Company will also provide notice in its monthly reports required by the Commission's fuel adjustment clause rules that identifies the new schedule, charge type costs or revenues by amount, description and location within the monthly reports;~~

~~D. The Company shall account for the new schedule, charge type costs or revenues in a manner which allows for the transparent determination of current period and cumulative costs or revenues;~~

~~E. If the Company makes the filing provided for in B above and a party challenges the inclusion, such challenge will not delay approval of the FAR filing. To challenge the inclusion of a new schedule or charge type, a party shall make a filing with the Commission based upon that party's contention that the new schedule, charge type costs or revenues at issue should not have been included, because they do not possess the characteristics of the schedules, costs or revenues listed in Factors PP, TC or OSSR, as the case may be. A party wishing to challenge the inclusion of a schedule or charge type shall include in its filing the reasons why it believes the Company did not show that the new schedule or charge type possesses the characteristics of the costs or revenues listed in Factors TC, PP or OSSR, as the case may be, and its filing shall be made within 30 days of the Company's filing under B above. In the event of a timely challenge, the Company shall bear the burden of proof to support its decision to include a new schedule or charge type in a FAR filing. Should such challenge be upheld by the Commission, any such costs will be refunded (or revenues retained) through a future FAR filing in a manner consistent with that utilized for Factor P; and~~

~~F. A party other than the Company may seek the inclusion of a new schedule or charge type in a FAR filing by making a filing with the Commission no less than 60 days before the Company's next FAR filing date of January 1 or July 1. Such a filing shall give the Commission notice that such party believes the new schedule or charge type should be included because it possesses the characteristics of, and is of the nature of, the costs or revenues listed in factors PP, TC or OSSR, as the case may be. The party's filing shall identify the proposed accounts affected by such change, provide a description of the new schedule or charge type demonstrating that it possesses the characteristics of, and is of the nature of, the~~

~~schedules, costs or revenues listed in factors PP, TC or OSSR as the case may be, and identify the preexisting schedule or market settlement charge type(s) which the new schedule or charge type replaces or supplements. If a party makes the filing provided for by this paragraph F and a party (including the Company) challenges the inclusion, such challenge will not delay inclusion of the new schedule or charge type in the FAR filing or delay approval of the FAR filing. To challenge the inclusion of a new schedule or charge type, the challenging party shall make a filing with the Commission based upon that party's contention that the new schedule or charge type costs or revenues at issue should not have been included, because they do not possess the characteristics of the schedules, costs or revenues listed in Factors PP, TC, or OSSR, as the case may be. The challenging party shall make its filing challenging the inclusion and stating the reasons why it believes the new schedule or charge type does not possess the characteristic of the costs or revenues listed in Factors PP, TC or OSSR, as the case may be, within 30 days of the filing that seeks inclusion of the new schedule or charge type. In the event of a timely challenge, the party seeking the inclusion of the new schedule or charge type shall bear the burden of proof to support its contention that the new schedule or charge type should be included in the Company's FAR filings. Should such challenge be upheld by the Commission, any such costs will be refunded (or revenues retained) through a future FAR filing in a manner consistent with that utilized for Factor P.~~

SPP IM charge/revenue types that are included in the FAC are listed below:

Day Ahead Ramp Capability Up Amount

Day Ahead Ramp Capability Down Amount

Day Ahead Ramp Capability Up Distribution Amount

Day Ahead Ramp Capability Down Distribution Amount

Day Ahead Regulation Down Service Amount

Day Ahead Regulation Down Service Distribution Amount

Day Ahead Regulation Up Service Amount

Day Ahead Regulation Up Service Distribution Amount

Day Ahead Spinning Reserve Amount

Day Ahead Spinning Reserve Distribution Amount

Day Ahead Supplemental Reserve Amount

Day Ahead Supplemental Reserve Distribution Amount

Real Time Contingency Reserve Deployment Failure Amount

Real Time Contingency Reserve Deployment Failure Distribution Amount

Real Time Ramp Capability Up Amount

Real Time Ramp Capability Down Amount

Real Time Ramp Capability Up Distribution Amount

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(Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)

FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

SPP IM charge/revenue types that are included in the FAC (continued)

- [Real Time Ramp Capability Down Distribution Amount](#)
- [Real Time Ramp Capability Non-Performance Amount](#)
- [Real Time Ramp Capability Non-Performance Distribution Amount](#)
- Real Time Regulation Service Deployment Adjustment Amount
- Real Time Regulation Down Service Amount
- Real Time Regulation Down Service Distribution Amount
- Real Time Regulation Non-Performance
- Real Time Regulation Non-Performance Distribution
- Real Time Regulation Up Service Amount
- Real Time Regulation Up Service Distribution Amount
- Real Time Spinning Reserve Amount
- Real Time Spinning Reserve Distribution Amount
- Real Time Supplemental Reserve Amount
- Real Time Supplemental Reserve Distribution Amount
- Day Ahead Asset Energy
- Day Ahead Non-Asset Energy
- Day Ahead Virtual Energy Amount
- Real Time Asset Energy Amount
- Real Time Non-Asset Energy Amount
- Real Time Virtual Energy Amount
- Transmission Congestion Rights Funding Amount
- Transmission Congestion Rights Daily Uplift Amount
- Transmission Congestion Rights Monthly Payback Amount
- Transmission Congestion Rights Annual Payback Amount
- Transmission Congestion Rights Annual Closeout Amount
- Transmission Congestion Rights Auction Transaction Amount
- Auction Revenue Rights Funding Amount
- Auction Revenue Rights Uplift Amount
- Auction Revenue Rights Monthly Payback Amount
- Auction Revenue Annual Payback Amount
- Auction Revenue Rights Annual Closeout Amount
- Day Ahead Demand Reduction Amount
- Day Ahead Demand Reduction Distribution Amount
- Day Ahead Grandfathered Agreement Carve Out Daily Amount
- Grandfathered Agreement Carve Out Distribution Daily Amount
- Day Ahead Grandfathered Agreement Carve Out Monthly Amount
- Grandfathered Agreement Carve Out Distribution Monthly Amount
- Day Ahead Grandfathered Agreement Carve Out Yearly Amount
- Grandfathered Agreement Carve Out Distribution Yearly Amount
- Day Ahead Make Whole Payment Amount
- Day Ahead Make Whole Payment Distribution Amount
- [Day Ahead Combined Interest Resource Adjustment Amount](#)
- [Real Time Combined Interest Resource Adjustment Amount](#)
- [Integrated Marketplace Clearing Administration Service](#)
- [Integrated Marketplace Facilitation Administration Service](#)

FUEL ADJUSTMENT CLAUSE – Rider FAC
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FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

SPP IM charge/revenue types that are included in the FAC (continued)

Transmission Congestion Rights Administration Service

Miscellaneous Amount

Reliability Unit Commitment Make Whole Payment Amount

Real Time Out of Merit Amount

Reliability Unit Commitment Make Whole Payment Distribution Amount

Over Collected Losses Distribution Amount

Real Time Joint Operating Agreement Amount

Real Time Reserve Sharing Group Amount

Real Time Reserve Sharing Group Distribution Amount

Real Time Demand Reduction Amount

Real Time Demand Reduction Distribution Amount

Real Time Pseudo Tie Congestion Amount

Real Time Pseudo Tie Losses Amount

Unused Regulation Up Mileage Make Whole Payment Amount

Unused Regulation Down Mileage Make Whole Payment Amount

Revenue Neutrality Uplift Distribution Amount

Should FERC require any item covered by components FC, E, PP, TC, OSSR or R to be recorded in an account different than the FERC accounts listed in such components, such items shall nevertheless be included in component FC, E, PP, TC, OSSR or R. In the month that the Company begins to record items in a different account, the Company will file with the Commission the previous account number, the new account number and what costs or revenues that flow through the Rider FAC to be recorded in the account.

B = Net base energy costs ordered by the Commission in the last general rate case consistent with the costs and revenues included in the calculation of the FPA.
Net Base Energy costs will be calculated as shown below: $S_{AP} \times \text{Base Factor ("BF")}$

SAP = Net system input ("NSI") in kWh for the accumulation period, at the generation level, excluding the energy used by customers served under the MKT Schedule.

BF = Company base factor costs per kWh: \$0.0255069

J = Missouri Retail Energy Ratio = Retail kWh sales/total system kWh
Where: total system kWh equals retail and full and partial requirement sales associated with GMO.

T = True-up amount as defined below.

**FUEL ADJUSTMENT CLAUSE – Rider FAC
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FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

I = Interest applicable to (i) the difference between Missouri Retail ANEC and B for all kWh of energy supplied during an accumulation period 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.

P = Prudence adjustment amount, if any.

FAR = FPA/S_{RP}

Single Accumulation Period Secondary Voltage $FAR_{Sec} = FAR * VAF_{Sec}$

Single Accumulation Period Primary Voltage $FAR_{Prim} = FAR * VAF_{Prim}$

Single Accumulation Period Substation Voltage $FAR_{Sub} = FAR * VAF_{Sub}$

Single Accumulation Period Transmission Voltage $FAR_{Trans} = FAR * VAF_{Trans}$

Annual Secondary Voltage FAR_{Sec} = Aggregation of the two Single Accumulation Period Secondary Voltage FARs still to be recovered

Annual Primary Voltage FAR_{Prim} = Aggregation of the two Single Accumulation Period Primary Voltage FARs still to be recovered

Annual Substation Voltage FAR_{Sub} = Aggregation of the two Single Accumulation Period Substation Voltage FARs still to be recovered

Annual Transmission Voltage FAR_{Trans} = Aggregation of the two Single Accumulation Period Transmission Voltage FARs still to be recovered

Where:

FPA = Fuel and Purchased Power Adjustment

S_{RP} = Forecasted Missouri jurisdictional recovery period retail NSI in kWh, at the generation level, excluding the energy used by customers served under the MKT Schedule.

VAF = Expansion factor by voltage level
 VAF_{Sec} = Expansion factor for lower than primary voltage customers
 VAF_{Prim} = Expansion factor for primary to substation voltage customers
 VAF_{Sub} = Expansion factor for substation to transmission voltage customers
 VAF_{Trans} = Expansion factor for transmission voltage customers

FUEL ADJUSTMENT CLAUSE – Rider FAC
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TRUE-UPS

After completion of each recovery period, the Company shall make a true-up filing by the filing date of its next FAR filing. Any true-up adjustments shall be reflected in component “T” above. Interest on the true-up adjustment will be included in component “I” above.

The true-up amount shall be the difference between the revenues billed and the revenues authorized for collection during the RP as well as any corrections identified to be included in the current FAR filing. Any corrections included will be discussed in the testimony accompanying the true-up filing.

PRUDENCE REVIEWS

Prudence reviews of the costs subject to this Rider FAC shall occur no less frequently than every eighteen months, and any such costs which are determined by the Commission to have been imprudently incurred or incurred in violation of the terms of this Rider FAC shall be returned to customers. Adjustments by Commission order, if any, pursuant to any prudence review shall be included in the FAR calculation in component “P” above unless a separate refund is ordered by the Commission. Interest on the prudence adjustment will be included in component “I” above.

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For Missouri Retail Service Area

FUEL ADJUSTMENT CLAUSE – Rider FAC
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| Accumulation Period Ending: | | | |
|-----------------------------|--|----------|-----------|
| 1 | Actual Net Energy Cost (ANEC) = (FC+E+PP+TC-OSSR-R-Rev) | | |
| 2 | Net Base Energy Cost (B) | - | |
| | 2.1 Base Factor (BF) | | \$0.02550 |
| | 2.2 Accumulation Period NSI (S _{AP}) | | |
| 3 | (ANEC-B) | | |
| 4 | Jurisdictional Factor (J) | x | |
| 5 | (ANEC-B)*J | | |
| 6 | Customer Responsibility | x | |
| 7 | 95% *((ANEC-B)*J) | | |
| 8 | True-Up Amount (T) | + | |
| 9 | Interest (I) | + | |
| 10 | Prudence Adjustment Amount (P) | + | |
| 11 | Fuel and Purchased Power Adjustment (FPA) | = | |
| | 11.1 PISA Deferral (Sec. 393.1400) | | |
| | 11.2 FPA Subject to Recover in True-Up | | |
| 12 | Estimated Recovery Period Retail NSI (S _{RP}) | ÷ | |
| 13 | Current Period Fuel Adjustment Rate (FAR) | = | |
| 14 | Current Period FAR _{Sec} = FAR x VAF _{Sec} | | |
| 15 | Prior Period FAR _{Sec} | + | |
| 16 | Current Annual FAR _{Sec} | = | |
| 17 | Current Period FAR _{Prim} = FAR x VAF _{Prim} | | |
| 18 | Prior Period FAR _{Prim} | + | |
| 19 | Current Annual FAR _{Prim} | = | |
| 20 | Current Period FAR _{Sub} = FAR x VAF _{Sub} | | |
| 21 | Prior Period FAR _{Sub} | + | |
| 22 | Current Annual FAR _{Sub} | = | |
| 23 | Current Period FAR _{Trans} = FAR x VAF _{Trans} | | |
| 24 | Prior Period FAR _{Trans} | + | |
| 25 | Current Annual FAR _{Trans} | = | |
| 26 | VAF _{Sec} = 1.0766 | | |
| 27 | VAF _{Prim} = 1.0503 | | |
| 28 | VAF _{Sub} = 1.0388 | | |
| 29 | VAF _{Trans} = 1.0300 | | |

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For Missouri Retail Service Area

**FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE
(Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)**

DEFINITIONS

ACCUMULATION PERIODS, FILING DATES AND RECOVERY PERIODS:

An accumulation period is the six calendar months during which the actual costs and revenues subject to this rider will be accumulated for the purposes of determining the Fuel Adjustment Rate (“FAR”). The two six-month accumulation periods each year through four years from the effective date of this tariff sheet, the two corresponding twelve-month recovery periods and the filing dates will be as shown below. Each filing shall include detailed work papers in electronic format to support the filing.

| <u>Accumulation Periods</u> | <u>Filing Dates</u> | <u>Recovery Periods</u> |
|-----------------------------|---------------------|-------------------------|
| June – November | By January 1 | March – February |
| December – May | By July 1 | September – August |

A recovery period consists of the months during which the FAR is applied to customer billings on a per kilowatt-hour (kWh) basis.

COSTS AND REVENUES:

Costs eligible for the Fuel and Purchased Power Adjustment (“FPA”) will be the Company’s allocated Jurisdictional costs for the fuel component of the Company’s generating units, reservation charges, purchased power energy charges including applicable Southwest Power Pool (“SPP”) charges, emission allowance costs and amortizations, cost of transmission of electricity by others associated with -purchased power and off-system sales, and the cost described below associated with the company’s hedging programs all as incurred during the accumulation period. These costs will be offset by jurisdictional off-system sales revenues, applicable SPP revenues, revenue from the sale of Renewable Energy Certificates or Credits (“REC”) and retail revenues associated with specific customer programs identified. Eligible costs do not include the purchased power demand costs associated with purchased power contracts in excess of one year or costs associated with service provided to customers taking energy through Schedule MKT. Likewise, revenues do not include demand or capacity receipts associated with power contracts in excess of one year.

APPLICABILITY

The price per kWh of electricity sold to retail customers not served under Schedule MKT will be adjusted (up or down) in March and September subject to application of the Rider FAC and approval by the Missouri Public Service Commission (“MPSC” or “Commission”).

The FAR is the result of dividing the FPA by forecasted Missouri retail net system input (“SRP”) for the recovery period, expanded for Voltage Adjustment Factors (“VAF”), rounded to the nearest \$0.00001, and aggregated over two accumulation periods. The amount charged on a separate line on retail customers’ bills is equal to the current annual FAR multiplied by kWh billed.

**FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE
(Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)**

FORMULAS AND DEFINITIONS OF COMPONENTS

FPA = 95% * ((ANEC – B) * J) + T + I + P

ANEC = Actual Net Energy Costs = (FC + E + PP + TC – OSSR – R - Rev)

FC = Fuel costs Incurred to support sales:
The following costs reflected in Federal Energy Regulatory Commission (“FERC”) Account Number 501:
Subaccount 501000: coal commodity and transportation, side release and freeze conditioning agents, dust mitigation agents, accessorial charges as delineated in railroad accessorial tariffs [additional crew, closing hopper railcar doors, completion of loading of a unit train and its release for movement, completion of unloading of a unit train and its release for movement, delay for removal of frozen coal, destination detention, diversion of empty unit train (including administration fee, holding charges, and out-of-route charges which may include fuel surcharge), diversion of loaded coal trains, diversion of loaded unit train fees (including administration fee, additional mileage fee or out-of-route charges which may include fuel surcharge), fuel surcharge, held in transit, hold charge, locomotive release, miscellaneous handling of coal cars, origin detention, origin re-designation, out-of-route charges (including fuel surcharge), out-of-route movement, pick-up of locomotive power, placement and pick-up of loaded or empty private coal cars on railroad supplied tracks, placement and pick-up of loaded or empty private coal cars on shipper supplied tracks, railcar storage, release of locomotive power, removal, rotation and/or addition of cars, storage charges, switching, trainset positioning, trainset storage, and weighing], unit train maintenance, leases, depreciation and applicable taxes, natural gas costs including reservation charges, fuel quality adjustments, fuel hedging costs, fuel adjustments included in commodity and transportation costs, broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers), and margins (cash or collateral used to secure or maintain the Company’s hedge position with a brokerage or exchange), oil costs for commodity, propane costs, storage, taxes, fees, and fuel losses, coal and oil inventory adjustments, and insurance recoveries, subrogation recoveries and settlement proceeds for fuel expenses in the 501 Accounts.
Subaccount 501020: the allocation of the allowed costs in the 501000, 501300, 501400 and 501420 accounts attributed to native load;
Subaccount 501030: the allocation of the allowed costs in the 501000, 501300, 501400 and 501420 accounts attributed to off-system sales;
Subaccount 501300: fuel additives and consumable costs for Air Quality Control Systems (“AQCS”) operations, such as ammonia, hydrated lime, lime, limestone, limestone inventory adjustment, powder activated carbon, urea, propane, sodium bicarbonate, calcium bromide, sulfur, and RESPond, or other consumables which perform similar functions;
Subaccount 501400 and 501420: residual costs and revenues associated with combustion byproducts, slag and ash disposal costs and revenues including contractors, materials and other miscellaneous expenses.

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FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

The following costs reflected in FERC Account Number 547:

Subaccount 547000: natural gas and oil costs for commodity, transportation, broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers), storage, taxes, fees and fuel losses, hedging costs for natural gas, oil, and natural gas used to cross-hedge purchase power for sales, and settlement proceeds, insurance recoveries, subrogation recoveries for fuel expenses, and broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers), and margins (cash or collateral used to secure or maintain the Company's hedge position with a brokerage or exchange).

Subaccount 547020: the allocation of the allowed costs in the 547000 and 547300 accounts attributed to native load;

Subaccount 547027: natural gas reservation charges;

Subaccount 547030: the allocation of the allowed costs in the 547000 and 547300 accounts attributed to off-system sales; Subaccount 547300: fuel additives and consumable costs for Air Quality Control Systems ("AQCS") operations, such as ammonia or other consumables which perform similar functions.

E = Net Emission Costs:

The following costs and revenues reflected in FERC Account Number 509:

Subaccount 509000: NOx and SO₂ emission allowance costs, including any associated hedging costs, and broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers) offset by revenue amortizations and revenues from the sale of NOx and SO₂ emission allowance and margins (cash or collateral used to secure or maintain the Company's hedge position with a brokerage or exchange)

PP = Purchased Power Costs:

The following costs or revenues reflected in FERC Account Number 555:

Subaccount 555005: capacity charges for capacity purchases one year or less in duration;

Subaccount 555000: purchased power costs, energy charges from capacity purchases, insurance recoveries, and subrogation recoveries for purchased power expenses, hedging costs including broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers), and margins (cash or collateral used to secure or maintain the Company's hedge position with a brokerage or exchange), charges and credits related to the SPP Integrated Marketplace ("IM") or other IMs, including energy, revenue neutrality, make whole and

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FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

PP = Purchased power Costs (continued):

out of merit payments and distributions, over collected losses payments and distributions, Transmission Congestion Rights (“TCR”) and Auction Revenue Rights (“ARR”) settlements, virtual energy costs, revenues and related fees where the virtual energy transaction is a hedge in support of physical operations related to a generating resource or load, load/export charges, ancillary services including non-performance and distribution payments and charges and other miscellaneous SPP Integrated Market charges including uplift charges or credits, excluding (1) the amounts associated with purchased power agreements associated with the Renewable Energy Rider tariff and (2) amounts associated with the purchase of power for customers served under the MKT Schedule.

Subaccount 555030: the allocation of the allowed costs in the 555000 account attributed to purchases for off-system sales;

Subaccount 555035: purchased power costs associated with the WAPA agreement.
Subaccount 555070: SPP purchased power administration fees.

TC = Transmission Costs:

The following costs reflected in FERC Account Number 565:

Subaccount 565000: non-SPP transmission used to serve off-system sales or to make purchases for load, excluding any transmission costs associated with the Crossroads Power Plant and 43.00% of the SPP transmission service costs which includes the schedules listed below as well as any adjustments to the charges in the schedules below:

- Schedule 7 – Long Term Firm and Short Term Point to Point Transmission Service
- Schedule 8 – Non Firm Point to Point Transmission Service
- Schedule 9 – Network Integration Transmission Service
- Schedule 10 – Wholesale Distribution Service
- Schedule 11 – Base Plan Zonal Charge and Region Wide Charge

excluding amounts associated with portions of purchased power agreements dedicated to specific customers under the Renewable Energy Rider tariff.

Subaccount 565020: the allocation of the allowed costs in the 565000 account attributed to native load;

Subaccount 565027: the allocation of the allowed costs in the 565000 account attributed to transmission demand charges;

Subaccount 565030: the allocation of the allowed costs in account 565000 attributed to off-system sales.

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FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

OSSR = Revenues from Off-System Sales:

The following revenues or costs reflected in FERC Account Number 447:

Subaccount 447020: all revenues from off-system sales. This includes charges and credits related to the SPP IM, or other IMs, including, energy, ancillary services, revenue sufficiency (such as make whole payments and out of merit payments and distributions), revenue neutrality payments and distributions, over collected losses payments and distributions, TCR and ARR settlements, demand reductions, virtual energy costs and revenues and related fees where the virtual energy transaction is a hedge in support of physical operations related to a generating resource or load, generation/export charges, ancillary services including non-performance and distribution payments and SPP uplift revenues or credits, hedging costs, excluding (1) the amounts associated with purchased power agreements associated with the Renewable Energy Rider tariff, and (2) off-system sales revenues from full and partial requirements sales to municipalities that are served through bilateral contracts in excess of one year. Additional revenue will be added at an imputed 75% of the unsubscribed portion associated with the Solar Subscription Rider valued at market price. For future solar subscription projects, additional revenue will be added at an imputed 100% of the unsubscribed portion up to 50%;

Subaccount 447012: capacity charges for capacity sales;

Subaccount 447030: the allocation of the includable sales in account 447020 not attributed to retail sales.

Subaccount 447035: the off-systems sales revenues associated with the WAPA agreement.

R = Renewable Energy Credit Revenue:

Revenues reflected in FERC account 509000 and gains and losses to be recorded in FERC accounts 411800 and 411900 from the sale of RECs that are not needed to meet the Missouri Renewable Energy Standards less the cost associated with making the sale.

Revenues from excess RECs sold for the benefit of specific tariff participation less the cost associated with making the sale. Any costs to purchase RECs for the Business EV Charging Service Carbon Free Energy Option recorded in FERC account 509000 including the NAR fees incurred to administer these programs.

Rev = Retail revenues in accounts 440 – 442, resources XXXX and XXXX associated with the low-income solar subscription project and the Business EV Charging Service Carbon Free Energy Option, less the costs of retiring the RECs for these programs.

Hedging costs are defined as realized losses and costs (including broker commissions, fees, and margins) minus realized gains associated with mitigating volatility in the Company's cost of fuel, fuel additives, fuel transportation, emission allowances, transmission and power purchases or sales, including but not limited to, the Company's use of derivatives whether over-the counter or exchange traded including, without limitation, futures or forward contracts, puts, calls, caps, floors, collars, swaps, TCRs, virtual energy transactions, or similar instruments

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FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

Costs and revenues not specifically detailed in Factors FC, PP, E, TC, OSSR, or R shall not be included in the Company's FAR filings; provided however, in the case of Factors PP, TC or OSSR, the market settlement charge types under which SPP or another centrally administered market (e.g., PJM or MISO) bills/credits a cost or revenue need not be detailed in Factors PP or OSSR for the costs or revenues to be considered specifically detailed in Factors PP or OSSR; and provided further, should the SPP or another centrally administered market (e.g. PJM or MISO) implement a new market settlement charge type not listed below or a new schedule not listed in TC:

SPP IM charge/revenue types that are included in the FAC are listed below:

- Day Ahead Ramp Capability Up Amount
- Day Ahead Ramp Capability Down Amount
- Day Ahead Ramp Capability Up Distribution Amount
- Day Ahead Ramp Capability Down Distribution Amount
- Day Ahead Regulation Down Service Amount
- Day Ahead Regulation Down Service Distribution Amount
- Day Ahead Regulation Up Service Amount
- Day Ahead Regulation Up Service Distribution Amount
- Day Ahead Spinning Reserve Amount
- Day Ahead Spinning Reserve Distribution Amount
- Day Ahead Supplemental Reserve Amount
- Day Ahead Supplemental Reserve Distribution Amount
- Real Time Contingency Reserve Deployment Failure Amount
- Real Time Contingency Reserve Deployment Failure Distribution Amount
- Real Time Ramp Capability Up Amount
- Real Time Ramp Capability Down Amount
- Real Time Ramp Capability Up Distribution Amount

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FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

SPP IM charge/revenue types that are included in the FAC (continued)

- Real Time Ramp Capability Down Distribution Amount
- Real Time Ramp Capability Non-Performance Amount
- Real Time Ramp Capability Non-Performance Distribution Amount
- Real Time Regulation Service Deployment Adjustment Amount
- Real Time Regulation Down Service Amount
- Real Time Regulation Down Service Distribution Amount
- Real Time Regulation Non-Performance
- Real Time Regulation Non-Performance Distribution
- Real Time Regulation Up Service Amount
- Real Time Regulation Up Service Distribution Amount
- Real Time Spinning Reserve Amount
- Real Time Spinning Reserve Distribution Amount
- Real Time Supplemental Reserve Amount
- Real Time Supplemental Reserve Distribution Amount
- Day Ahead Asset Energy
- Day Ahead Non-Asset Energy
- Day Ahead Virtual Energy Amount
- Real Time Asset Energy Amount
- Real Time Non-Asset Energy Amount
- Real Time Virtual Energy Amount
- Transmission Congestion Rights Funding Amount
- Transmission Congestion Rights Daily Uplift Amount
- Transmission Congestion Rights Monthly Payback Amount
- Transmission Congestion Rights Annual Payback Amount
- Transmission Congestion Rights Annual Closeout Amount
- Transmission Congestion Rights Auction Transaction Amount
- Auction Revenue Rights Funding Amount
- Auction Revenue Rights Uplift Amount
- Auction Revenue Rights Monthly Payback Amount
- Auction Revenue Annual Payback Amount
- Auction Revenue Rights Annual Closeout Amount
- Day Ahead Demand Reduction Amount
- Day Ahead Demand Reduction Distribution Amount
- Day Ahead Grandfathered Agreement Carve Out Daily Amount
- Grandfathered Agreement Carve Out Distribution Daily Amount
- Day Ahead Grandfathered Agreement Carve Out Monthly Amount
- Grandfathered Agreement Carve Out Distribution Monthly Amount
- Day Ahead Grandfathered Agreement Carve Out Yearly Amount
- Grandfathered Agreement Carve Out Distribution Yearly Amount
- Day Ahead Make Whole Payment Amount
- Day Ahead Make Whole Payment Distribution Amount
- Day Ahead Combined Interest Resource Adjustment Amount
- Real Time Combined Interest Resource Adjustment Amount
- Integrated Marketplace Clearing Administration Service
- Integrated Marketplace Facilitation Administration Service

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FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

SPP IM charge/revenue types that are included in the FAC (continued)

- Transmission Congestion Rights Administration Service
- Miscellaneous Amount
- Reliability Unit Commitment Make Whole Payment Amount
- Real Time Out of Merit Amount
- Reliability Unit Commitment Make Whole Payment Distribution Amount
- Over Collected Losses Distribution Amount
- Real Time Joint Operating Agreement Amount
- Real Time Reserve Sharing Group Amount
- Real Time Reserve Sharing Group Distribution Amount
- Real Time Demand Reduction Amount
- Real Time Demand Reduction Distribution Amount
- Real Time Pseudo Tie Congestion Amount
- Real Time Pseudo Tie Losses Amount
- Unused Regulation Up Mileage Make Whole Payment Amount
- Unused Regulation Down Mileage Make Whole Payment Amount
- Revenue Neutrality Uplift Distribution Amount

Should FERC require any item covered by components FC, E, PP, TC, OSSR or R to be recorded in an account different than the FERC accounts listed in such components, such items shall nevertheless be included in component FC, E, PP, TC, OSSR or R. In the month that the Company begins to record items in a different account, the Company will file with the Commission the previous account number, the new account number and what costs or revenues that flow through the Rider FAC to be recorded in the account.

- B = Net base energy costs ordered by the Commission in the last general rate case consistent with the costs and revenues included in the calculation of the FPA.
Net Base Energy costs will be calculated as shown below: $S_{AP} \times \text{Base Factor ("BF")}$
- S_{AP} = Net system input ("NSI") in kWh for the accumulation period, at the generation level, excluding the energy used by customers served under the MKT Schedule.
- BF = Company base factor costs per kWh: \$0.02550
- J = Missouri Retail Energy Ratio = Retail kWh sales/total system kWh
Where: total system kWh equals retail and full and partial requirement sales associated with GMO.
- T = True-up amount as defined below.

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FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

I = Interest applicable to (i) the difference between Missouri Retail ANEC and B for all kWh of energy supplied during an accumulation period 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.

P = Prudence adjustment amount, if any.

FAR = FPA/S_{RP}

Single Accumulation Period Secondary Voltage $FAR_{Sec} = FAR * VAF_{Sec}$

Single Accumulation Period Primary Voltage $FAR_{Prim} = FAR * VAF_{Prim}$

Single Accumulation Period Substation Voltage $FAR_{Sub} = FAR * VAF_{Sub}$

Single Accumulation Period Transmission Voltage $FAR_{Trans} = FAR * VAF_{Trans}$

Annual Secondary Voltage FAR_{Sec} = Aggregation of the two Single Accumulation Period Secondary Voltage FARs still to be recovered

Annual Primary Voltage FAR_{Prim} = Aggregation of the two Single Accumulation Period Primary Voltage FARs still to be recovered

Annual Substation Voltage FAR_{Sub} = Aggregation of the two Single Accumulation Period Substation Voltage FARs still to be recovered

Annual Transmission Voltage FAR_{Trans} = Aggregation of the two Single Accumulation Period Transmission Voltage FARs still to be recovered

Where:

FPA = Fuel and Purchased Power Adjustment

S_{RP} = Forecasted Missouri jurisdictional recovery period retail NSI in kWh, at the generation level, excluding the energy used by customers served under the MKT Schedule.

VAF = Expansion factor by voltage level
VAF_{Sec} = Expansion factor for lower than primary voltage customers
VAF_{Prim} = Expansion factor for primary to substation voltage customers
VAF_{Sub} = Expansion factor for substation to transmission voltage customers
VAF_{Trans} = Expansion factor for transmission voltage customers

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TRUE-UPS

After completion of each recovery period, the Company shall make a true-up filing by the filing date of its next FAR filing. Any true-up adjustments shall be reflected in component “T” above. Interest on the true-up adjustment will be included in component “I” above.

The true-up amount shall be the difference between the revenues billed and the revenues authorized for collection during the RP as well as any corrections identified to be included in the current FAR filing. Any corrections included will be discussed in the testimony accompanying the true-up filing.

PRUDENCE REVIEWS

Prudence reviews of the costs subject to this Rider FAC shall occur no less frequently than every eighteen months, and any such costs which are determined by the Commission to have been imprudently incurred or incurred in violation of the terms of this Rider FAC shall be returned to customers. Adjustments by Commission order, if any, pursuant to any prudence review shall be included in the FAR calculation in component “P” above unless a separate refund is ordered by the Commission. Interest on the prudence adjustment will be included in component “I” above.

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

P.S.C. MO. No. 1 Original Sheet No. 127.34

Canceling P.S.C. MO. No. _____ Sheet No. _____

For Missouri Retail Service Area

FUEL ADJUSTMENT CLAUSE – Rider FAC
 FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE
 (Applicable to Service Provided the Effective Date of This Tariff Sheet and Thereafter)

| Accumulation Period Ending: | | | |
|-----------------------------|--|----------|-----------|
| | | | |
| 1 | Actual Net Energy Cost (ANEC) = (FC+E+PP+TC-OSSR-R-Rev) | | |
| 2 | Net Base Energy Cost (B) | - | |
| | 2.1 Base Factor (BF) | | \$0.02550 |
| | 2.2 Accumulation Period NSI (S _{AP}) | | |
| 3 | (ANEC-B) | | |
| 4 | Jurisdictional Factor (J) | x | |
| 5 | (ANEC-B)*J | | |
| 6 | Customer Responsibility | x | |
| 7 | 95% *((ANEC-B)*J) | | |
| 8 | True-Up Amount (T) | + | |
| 9 | Interest (I) | + | |
| 10 | Prudence Adjustment Amount (P) | + | |
| 11 | Fuel and Purchased Power Adjustment (FPA) | = | |
| | 11.1 PISA Deferral (Sec. 393.1400) | | |
| | 11.2 FPA Subject to Recover in True-Up | | |
| 12 | Estimated Recovery Period Retail NSI (S _{RP}) | ÷ | |
| 13 | Current Period Fuel Adjustment Rate (FAR) | = | |
| 14 | Current Period FAR _{Sec} = FAR x VAF _{Sec} | | |
| 15 | Prior Period FAR _{Sec} | + | |
| 16 | Current Annual FAR _{Sec} | = | |
| 17 | Current Period FAR _{Prim} = FAR x VAF _{Prim} | | |
| 18 | Prior Period FAR _{Prim} | + | |
| 19 | Current Annual FAR _{Prim} | = | |
| 20 | Current Period FAR _{Sub} = FAR x VAF _{Sub} | | |
| 21 | Prior Period FAR _{Sub} | + | |
| 22 | Current Annual FAR _{Sub} | = | |
| 23 | Current Period FAR _{Trans} = FAR x VAF _{Trans} | | |
| 24 | Prior Period FAR _{Trans} | + | |
| 25 | Current Annual FAR _{Trans} | = | |
| 26 | VAF _{Sec} = 1.0766 | | |
| 27 | VAF _{Prim} = 1.0503 | | |
| 28 | VAF _{Sub} = 1.0388 | | |
| 29 | VAF _{Trans} = 1.0300 | | |

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