

Exhibit No. 280

MoPSC Staff – Exhibit 280
Karen Lyons
True-up Rebuttal Testimony
File Nos. ER-2022-0129 & ER-2022-0130

Exhibit No.:

Issue(s): *Revised True Up Revenue Requirement, Lease Expense*

Witness: *Karen Lyons*

Sponsoring Party: *MoPSC Staff*

Type of Exhibit: *True-Up Rebuttal Testimony*

Case No.: *ER-2022-0129 and ER-2022-0130*

Date Testimony Prepared: *August 25, 2022*

**MISSOURI PUBLIC SERVICE COMMISSION
FINANCIAL AND BUSINESS ANALYSIS DIVISION
AUDITING DEPARTMENT**

TRUE-UP REBUTTAL TESTIMONY

OF

KAREN LYONS

**Evergy Metro, Inc., d/b/a Evergy Missouri Metro
Case No. ER-2022-0129**

**Evergy Missouri West, Inc., d/b/a Evergy Missouri West
Case No. ER-2022-0130**

*Jefferson City, Missouri
August 2022*

1 **TRUE-UP REBUTTAL TESTIMONY**

2 **OF**

3 **KAREN LYONS**

4 **Evergy Metro, Inc., d/b/a Evergy Missouri Metro**
5 **Case No. ER-2022-0129**

6 **Evergy Missouri West, Inc., d/b/a Evergy Missouri West**
7 **Case No. ER-2022-0130**

8 Q. Please state your name and business address.

9 A. My name is Karen Lyons. My business address is 615 E 13th Street,
10 Kansas City, MO. 64106.

11 Q. By whom are you employed and in what capacity?

12 A. I am a Utility Regulatory Manager in the Auditing Department for the
13 Missouri Public Service Commission.

14 Q. Are you the same Karen Lyons who filed direct testimony on June 8, 2022,
15 rebuttal testimony on July 13, 2022, and surrebuttal/true-up direct testimony in these cases?

16 A. Yes I am.

17 Q. What is the purpose of your true-up rebuttal testimony?

18 A. The purpose of my testimony is to address corrections made to Staff's
19 recommended true-up revenue requirements for Evergy Metro Inc. ("Evergy Metro") and
20 Evergy Missouri West ("Evergy West") filed on August 17, 2022. I will also respond to Evergy
21 witness Ronald A. Klote regarding lease expense.

22 Q. Briefly describe the issue with lease expense.

23 A. Mr. Klote states in his true up direct testimony that the Company has included a
24 new lease for underground space in its true up revenue requirement for Evergy Metro.¹

¹ Case No. ER-2022-0129, Ronald A. Klote, page 20, lines 2-7.

True-up Rebuttal Testimony of
Karen Lyons

1 Q. Does Staff agree that the new lease for underground space should be included in
2 Evergy Metro's true-up revenue requirement?

3 A. Yes. The lease began April 1, 2022 prior to the end of the true up period,
4 May 31, 2022.

5 Q. Did Staff make any other corrections to its recommended true up revenue
6 requirements filed on August 17, 2022 for Evergy Metro and Evergy West?

7 A. Yes. Staff's recommended true up revenue requirement, after corrections and
8 the addition of the new lease, is \$27,440,090 for Evergy Metro and \$51,561,596 for
9 Evergy West.

10 Q. Does this conclude your true-up rebuttal testimony?

11 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) Case No. ER-2022-0130
Authority to Implement a General Rate)
Increase for Electric Service)

AFFIDAVIT OF KAREN LYONS

STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

COMES NOW KAREN LYONS and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *True-Up Rebuttal Testimony of Karen Lyons*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Karen Lyons

KAREN LYONS

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Jackson, State of Missouri, at my office in Kansas City, MO on this 24th day of August 2022.

M. Ridenhour

Notary Public



M. RIDENHOUR
My Commission Expires
July 22, 2023
Platte County
Commission #19603483