

Exhibit No.:
Issue: Fuel Adjustment Clause
Witness: Linda J. Nunn
Type of Exhibit: Direct Testimony
Sponsoring Party: Evergy Missouri Metro
Case No.: ER-2027-0032
Date Testimony Prepared: July 31, 2026

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2027-0032

DIRECT TESTIMONY

OF

LINDA J. NUNN

ON BEHALF OF

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

**Kansas City, Missouri
July 2026**

In the Matter of the Application of Evergy)
Missouri Metro for Authority to) Case No. ER-2027-0032
Implement Rate Adjustments Required by)
20 CSR 4240-20.090(8) and the)
Company's Approved Fuel and Purchased)
Power Cost Recovery Mechanism)

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

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

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.


Linda J. Nunn



Notary Public



DIRECT TESTIMONY

OF

LINDA J. NUNN

Case No. ER-2027-0032

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, Missouri
3 64105.

4 **Q: By whom and in what capacity are you employed?**

5 A: I am employed by Evergy Metro, Inc., as Senior Manager, Regulatory Affairs for
6 Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“EMM”), Evergy Missouri West, Inc.
7 d/b/a Evergy Missouri West (“EMW”), Evergy Metro, Inc. d/b/a Evergy Kansas Metro
8 (“EKM”), and Evergy Kansas Central, Inc. and Evergy Kansas South, Inc., collectively
9 d/b/a Evergy Kansas Central (“EKC”). These are the operating utilities of Evergy, Inc.

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

11 A: I am testifying on behalf of EMM (“Company”).

12 **Q: What are your responsibilities?**

13 A: My responsibilities include the coordination, preparation, and review of financial
14 information and schedules associated with fuel or transmission impacts on rate case
15 filings, and the coordination, preparation and review of financial information and
16 schedules associated with retail rider mechanism tariff filings for Evergy including:
17 EKC, EKM, EMM and EMW.

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

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

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

2 A: I became a Senior Regulatory Analyst with Kansas City Power & Light (“KCP&L”) in
3 2008, as a part of the acquisition of Aquila, Inc., by Great Plains Energy. In 2013, I was
4 promoted to Supervisor - Regulatory Affairs. In 2018 I became Manager, Regulatory
5 Affairs. In 2025 I became Senior Manager, Regulatory Affairs. Prior to my employment
6 with KCP&L, I was employed by Aquila, Inc. for a total of eleven years. In addition to
7 Regulatory, I have had experience in Accounting, Audit, and Business Services, where
8 I had responsibility for guiding restructuring within the delivery division. In addition to
9 my utility experience, I was the business manager and controller for two area churches.
10 Prior to that, I was an external auditor with Ernst & Whinney.

11 **Q: Have you previously testified in a proceeding before the Missouri Public Service**
12 **Commission (“MPSC” or “Commission”) or before any other utility regulatory**
13 **agency?**

14 A: Yes, I have testified before the MPSC, and I have provided written testimony in various
15 dockets before the MPSC. I have also worked closely with many MPSC Staff on
16 numerous filings as well as on rate case issues. Additionally, I have provided written
17 testimony in Kansas Corporation Commission dockets.

18 **Q: What is the purpose of your testimony?**

19 A: The purpose of my testimony is to support the Fuel Adjustment Clause (“FAC”) that
20 has been filed by EMM. This FAC tariff filing consists of a Fuel Adjustment Rate
21 (“FAR”) calculated using actual fuel and purchased power costs, net of off-system sales
22 revenues incurred by the Company. My testimony supports the rate schedule filed to
23 adjust rates for the FAC includable costs experienced during the six-month period of
24 January 2026 through June 2026. This six-month period represents the 22nd

1 accumulation period under EMM's FAC, which was originally approved by the
2 Commission in Case No. ER-2014-0370 ("2014 Case") and modified in Case Nos. ER-
3 2016-0285 ("2016 Case"), ER-2018-0145 ("2018 Case") and ER-2022-0129 ("2022
4 Case"). The proposed FAC for Missouri residential customers is a credit rate of
5 (\$0.00021) per kWh. Based on usage of 1,000 kWh per month, the customer will see a
6 monthly credit of \$0.21. This represents a decrease of \$1.63 to an EMM residential
7 customer's monthly bill compared to the current monthly FAC charge of \$1.42.

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

9 A: The Commission's rule governing fuel and purchased power cost recovery mechanisms
10 for electric utilities – specifically 20 CSR 4240-20.090(8)(A) – requires EMM to make
11 periodic filings to allow the Commission to review the actual net FAC includable costs
12 the Company has incurred and to allow rates to be adjusted, either up or down, to reflect
13 those actual costs. The Commission's rule requires at least one such review and
14 adjustment each year. EMM's approved FAC calls for two annual filings – one filing
15 covering the six-month accumulation period running from January through June and
16 another filing covering the accumulation period running from July through December.
17 Any increases or decreases in rates in these filings are then included in the customers'
18 bills over a subsequent 12-month recovery period.

19 For the 22nd accumulation period covering the period of January 2026 through
20 June 2026, EMM's actual FAC includable costs were lower than the base energy costs
21 included in base rates by approximately \$9.7 million. In accordance with the
22 Commission's rule and the Company's approved FAC, EMM has calculated the FAC
23 tariff that provides for a change in rates to return to customers 95% of those cost

1 changes, or approximately \$9.3 million. This amount is before true-up, interest or any
2 other adjustments.

3 In addition, a true-up filing is being made concurrently with this filing covering
4 the 19th accumulation period of July 2024 through December 2024 and its
5 corresponding recovery period of April 2025 through March 2026. The proposed 19th
6 recovery period results in a true-up amount of \$8,408 to be collected from customers.

7 In summary, these amounts combined with interest amounting to \$126,683
8 result in a proposed Fuel and Purchased Power Adjustment (“FPA”) of approximately
9 \$9.1 million to be returned to customers. The tariff being submitted with this filing
10 reflects rates effective October 1, 2026.

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

12 A: EMM’s Actual Net Energy Costs (“ANEC”) are lower than the base energy costs
13 included in base rates by approximately \$9.7 million. When compared to the prior 21st
14 accumulation period, the ANEC are \$39 million less in the 22nd accumulation period.
15 The winter months of January through June in the current 22nd accumulation period
16 typically result in lower load requirements and corresponding lower ANEC than the
17 summer months of July through December in the 21st accumulation period. January’s
18 Winter Storm Fern also impacted costs. Overall, fuel costs for the 22nd accumulation
19 period decreased by \$21 million, or 15%. However, natural gas costs increased \$10.6
20 million or 58% primarily due to Winter Storm Fern, as natural gas prices surged during
21 January 23-26, when extreme cold drove higher demand while freezing conditions
22 curtailed natural gas production. In addition, purchased power costs during the 22nd
23 accumulation period increased by \$32.3 million, or 32%. These higher fuel and
24 purchased power costs were more than offset by a \$50.6 million or 59% increase in off-

1 system sales due in part to elevated market conditions in January. Additionally, March
2 2026 includes an off-system sales revenue accrual of \$6.5 million related to EMM
3 interconnection updates and an accrual of \$4.1 million recorded to purchased power
4 associated with Southwest Power Pool (“SPP”) potential resettlements. SPP began
5 resettlement of these in May and is expected to be resolved by July.

6 **Q: How did you develop the various values used to derive the proposed FARs that are**
7 **shown on Schedule LJN-1?**

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

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

14 A: The proposed current period FARs for EMM’s customers by voltage level is shown
15 below:

Proposed Current Period FARs	
	\$ per kWh
Voltage	Rates
Transmission	(\$0.00087)
Substation	(\$0.00087)
Primary	(\$0.00088)
Secondary	(\$0.00090)

16
17
18 This is the difference between the base FAC includable costs and the actual costs
19 incurred by the Company including interest and any adjustments during the current 22nd

1 accumulation period of January 2026 through June 2026 and will be included in billed
2 FAC rates over a recovery period running from October 2026 through September 2027.

3 The proposed FAR was calculated in the manner specified in the Company's
4 FAC. Attached to my testimony, as Schedule LJN-1, is a copy of the proposed tariff
5 sheet with the current FAR, the prior period FAR and the total FAR that will be billed
6 to customers over the recovery period. The FAR calculated for the 20th accumulation
7 period has been removed as its recovery period will cease in September 2026. The FAR
8 for the prior 21st accumulation period is added to the FAR for the current 22nd
9 accumulation period to provide the annual FAR. Thus, given the proposed current FAR
10 calculations, the annual FARs for EMM customers are shown in the table below:

	ER-2026-0191		
Service	Proposed 7th Revised Sheet No. 50.42	Current 6th Revised Sheet No. 50.42	Impact
Transmission	(\$0.00020)	\$0.00137	\$ (0.00157)
Substation	(\$0.00020)	\$0.00138	\$ (0.00158)
Primary	(\$0.00020)	\$0.00139	\$ (0.00159)
Secondary	(\$0.00021)	\$0.00142	\$ (0.00163)

11
12 These proposed rates will be billed to customers from October 2026 through March
13 2027. As stated earlier, based on usage of 1,000 kWh per month this will result in a
14 monthly FAC credit of \$0.21, which is a decrease of \$1.63 to an EMM residential
15 customer's monthly bill compared to the current monthly FAC charge of \$1.42.

16 **Q: If the rate schedules filed by EMM are approved or allowed to go into effect, what**
17 **safeguards exist to ensure that the revenues the Company bills to its customers do**
18 **not exceed the fuel and purchased power costs that EMM actually incurred during**
19 **the accumulation period?**

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

12 **Q: Have each of these mechanisms been in effect throughout the FAC process since**
13 **its inception in the 2014 Case?**

14 A: Yes, EMM is currently in its seventh prudence review, Case No. EO-2026-0213, for the
15 review period of July 2024 through December 2025. In the previous sixth prudence
16 review, Case No. EO-2025-0073, for the review period of January 2023 through June
17 2024, MPSC Staff found no evidence of imprudence.

18 In the previous fifth prudence review, Case No. EO-2023-0276, for the review
19 period of July 2021 through December 2022, parties resolved certain issues pertaining
20 to purchased power and subsequent FAC reporting through a Non-Unanimous
21 Stipulation and Agreement which the Commission approved on May 12, 2024.

22 On September 14, 2022, in the Company's fourth prudence review, Case No.
23 EO-2022-0064, the Commission approved the Non-Unanimous Stipulation and
24 Agreement filed on July 25, 2022, where the Company agreed, with no admission of

1 imprudence, to a one-time FAC adjustment for 2017 vintage expired RECs. The
2 Company refunded \$703,825 plus interest of \$28,134 in the 15th accumulation period
3 filing, Case No. ER-2023-0245.

4 On May 4, 2022, in the Company's third prudence review, Case No. EO-2020-
5 0263 later consolidated in Case No. EO-2020-0262, the Commission issued its Report
6 and Order finding Evergy was imprudent by not utilizing demand response programs
7 to reduce energy costs for its customers during the review period of July 2018 through
8 December 2019. Therefore, the Company refunded the amount of \$152,165 plus
9 interest of \$7,947 in the 14th accumulation period, Case No. ER-2023-0030. Also in the
10 third prudence review, on January 20, 2021, an ordered adjustment for Montrose was
11 stipulated by parties amounting to \$199,104. Based on the agreement by parties, rather
12 than recovering this amount through the FAC, the Company recorded this to the Cost
13 of Removal FERC account for consideration in the 2022 general rate case, Case No.
14 ER-2022-0129, and refunded the amount of \$199,104 plus interest of \$10,281 in the
15 11th accumulation period FAR filing, Case No. ER-2021-0244.

16 In the first and second prudence reviews, the MPSC Staff indicated in each of
17 their reports that there were no areas of imprudence identified within the audits.

18 In addition, the Company has made 18 true-up filings, all of which were
19 approved by the MPSC. The 19th true-up filing is being made concurrent with this
20 semi-annual filing covering the 19th accumulation period of July 2024 through
21 December 2024 and its corresponding recovery period of April 2025 through March
22 2026. The Company's calculation of the proposed true-up resulting in a true-up amount
23 of \$8,408 to be collected from EMM customers has been included in the calculation of
24 the current proposed tariff change.

1 **Q: What action is EMM requesting from the Commission with respect to the rate**
2 **schedules that the Company has filed?**

3 A: The Company requests the Commission approve the proposed rate schedules to be
4 effective as of October 1, 2026.

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

6 A: Yes, it does.

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

P.S.C. MO. No. 7 7th **Revised Sheet No.** 50.42
Canceling P.S.C. MO. No. 7 6th **Revised Sheet No.** 50.42

For Missouri Retail Service Area

FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC
 (Applicable to Service Provided January 9, 2023 and Thereafter)
 Effective for the Customer Usage Beginning October 2026 through March 2027

Accumulation Period Ending: June 2026			
1	Actual Net Energy Cost (ANEC) = (FC+E+PP+TC-OSSR-R)		\$125,272,691
2	Net Base Energy Cost (B)	-	\$142,265,454
	2.1 Base Factor (BF)		\$0.01829
	2.2 Accumulation Period NSI (S _{AP})		7,778,318,999
3	(ANEC-B)		(\$16,992,764)
4	Jurisdictional Factor (J)	x	57.378796%
5	(ANEC-B)*J		(\$9,570,243)
6	Customer Responsibility	x	95%
7	95% *((ANEC-B)*J)		(\$9,262,731)
8	True-Up Amount (T)	+	\$8,408
9	Interest (I)	+	\$126,683
10	Prudence Adjustment Amount (P)	+	\$0
11	Fuel and Purchased Power Adjustment (FPA)	=	(\$9,127,640)
12	Estimated Recovery Period Retail NSI (S _{RP})	÷	10,885,712,863
13	Current Period Fuel Adjustment Rate (FAR)	=	(\$0.00084)
14			
15	Current Period FAR _{Trans} = FAR x VAF _{Trans}		(\$0.00087)
16	Prior Period FAR _{Trans}	+	\$0.00067
17	Current Annual FAR _{Trans}	=	(\$0.00020)
18			
19	Current Period FAR _{Sub} = FAR x VAF _{Sub}		(\$0.00087)
20	Prior Period FAR _{Sub}	+	\$0.00067
21	Current Annual FAR _{Sub}	=	(\$0.00020)
22			
23	Current Period FAR _{Prim} = FAR x VAF _{Prim}		(\$0.00088)
24	Prior Period FAR _{Prim}	+	\$0.00068
25	Current Annual FAR _{Prim}	=	(\$0.00020)
26			
27	Current Period FAR _{Sec} = FAR x VAF _{Sec}		(\$0.00090)
28	Prior Period FAR _{Sec}	+	\$0.00069
29	Current Annual FAR _{Sec}	=	(\$0.00021)
30	VAF _{Trans} = 1.0300		
31	VAF _{Sub} = 1.0378		
32	VAF _{Prim} = 1.0497		
33	VAF _{Sec} = 1.0690		