

Exhibit No.: 304  
Issues: Jurisdictional Allocation and  
LLPS Revenues  
Witness: Greg R. Meyer  
Type of Exhibit: Surrebuttal Testimony  
Sponsoring Party: Midwest Energy Consumers Group  
Case No.: ER-2026-0143  
Date Testimony Prepared: September 10, 2026

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

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**IN THE MATTER OF EVERGY METRO,  
INC. D/B/A EVERGY MISSOURI  
METRO'S REQUEST FOR AUTHORITY  
TO IMPLEMENT A GENERAL RATE  
INCREASE FOR ELECTRIC SERVICE**

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**CASE NO. ER-2026-0143**

Surrebuttal Testimony of

**Greg R. Meyer**

On behalf of

**Midwest Energy Consumers Group**

September 10, 2026



**BRUBAKER & ASSOCIATES, INC.**

Project 12018

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

IN THE MATTER OF EVERGY METRO,  
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METRO'S REQUEST FOR AUTHORITY  
TO IMPLEMENT A GENERAL RATE  
INCREASE FOR ELECTRIC SERVICE

CASE NO. ER-2026-0143

STATE OF MISSOURI )  
COUNTY OF ST. LOUIS )

SS

**Affidavit of Greg R. Meyer**

Greg R. Meyer, being first duly sworn, on his oath states:

1. My name is Greg R. Meyer. I am a consultant with Brubaker & Associates, Inc., having its principal place of business at 16690 Swingley Ridge Road, Suite 140, Chesterfield, Missouri 63017. We have been retained by Midwest Energy Consumers Group in this proceeding on their behalf.

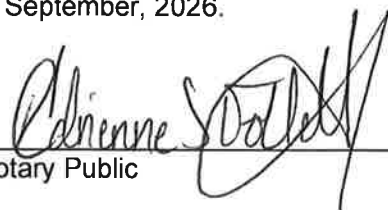
2. Attached hereto and made a part hereof for all purposes is my surrebuttal testimony which was prepared in written form for introduction into evidence in Missouri Public Service Commission Case No. ER-2026-0143.

3. I hereby swear and affirm that the testimony is true and correct and that it shows the matters and things that it purports to show.

  
\_\_\_\_\_  
Greg R. Meyer

Subscribed and sworn to before me this 10<sup>th</sup> day of September, 2026.



  
\_\_\_\_\_  
Notary Public

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|--------------------------------|--|---|-----------------------|
|                                |  | ) |                       |
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| METRO'S REQUEST FOR AUTHORITY  |  | ) | CASE NO. ER-2026-0143 |
| TO IMPLEMENT A GENERAL RATE    |  | ) |                       |
| INCREASE FOR ELECTRIC SERVICE  |  | ) |                       |
|                                |  | ) |                       |

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**BEFORE THE PUBLIC SERVICE COMMISSION  
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**IN THE MATTER OF EVERGY METRO,  
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**CASE NO. ER-2026-0143**

**Surrebuttal Testimony of Greg R. Meyer**

**I. INTRODUCTION**

**Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A Greg R. Meyer. My business address is 16690 Swingley Ridge Road, Suite 140,  
Chesterfield, MO 63017.

**Q ARE YOU THE SAME GREG R. MEYER WHO PREVIOUSLY FILED TESTIMONY IN  
THIS PROCEEDING?**

A Yes. I previously filed Direct Testimony on June 30, 2026 in this proceeding.

**Q ARE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE OUTLINED IN  
YOUR PRIOR TESTIMONY?**

A Yes. This information is included in Appendix A to my Direct Testimony filed on  
June 30, 2026.

**Q ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?**

A I am appearing on behalf of Midwest Energy Consumers Group ("MECG"). MECG  
represents the interests of large commercial and industrial customers taking service

**Greg R. Meyer  
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from Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Metro” or “Company”) primarily on its Large General Service (“LGS”) and Large Power Service (“LPS”) rate schedules. These customers are energy-intensive, compete in regional and national markets, and are very sensitive to electric rate levels and structures.

**Q WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

A My Surrebuttal Testimony will address the use of a 4 Coincident Peak (“CP”) jurisdictional allocator and my proposal to track large load customer revenues above a certain minimum level.

My silence with regard to any other position taken by the Company or any other party in this proceeding does not indicate my endorsement of that position.

## **II. RESPONSE TO COMPANY WITNESS WOLFRAM**

**Q HAVE YOU READ THE REBUTTAL TESTIMONY OF THE COMPANY’S WITNESS JOHN WOLFRAM THAT ADDRESSES YOUR POSITION WITH THE USE OF A 4 CP JURISDICTIONAL ALLOCATOR?**

A Yes, I have.

**Q PLEASE COMMENT ON MR. WOLFRAM’S REBUTTAL TESTIMONY.**

A Mr. Wolfram did not dispute the analysis performed by the Missouri Public Service Commission (“Commission”) Staff (“Staff”) witness Alan Bax. Mr. Bax’s analysis proves that the use of a 4 CP is a more appropriate jurisdictional allocator than a 12 CP for the Company. In fact on page 6 of his Rebuttal Testimony, Mr. Wolfram states the following:

**Greg R. Meyer  
Page 2**

37 As I stated in direct testimony, the FERC test results indicate that using  
38 a seasonal peak determination is more appropriate than using a 12 CP  
39 for determining the demand allocator, but that is not the same as saying  
40 that the 12 CP allocator is unreasonable or flawed.

41 In this case the seasonal peak allocator is a 4 CP allocator. From my  
42 perspective, Mr. Wolfram is admitting that a 4 CP allocator is more realistic of the  
43 Company's operations, but still proposes a jurisdictional allocator using the average of  
44 a 4 CP and 12 CP methodologies.

45 **Q IN HIS REBUTTAL TESTIMONY, MR. WOLFRAM DISCUSSES THE CONCEPT OF**  
46 **JURISDICTIONAL HARMONY. PLEASE DISCUSS THE CONCEPT OF**  
47 **JURISDICTIONAL HARMONY.**

48 A Jurisdictional harmony in my opinion is an argument to protect the Company from any  
49 shortfall in recovery of jurisdictional investments. In this instance, Mr. Wolfram is  
50 asking this Commission to ignore cost causation principles and adopt a jurisdictional  
51 allocator that will unreasonably assign more costs to Missouri ratepayers. By doing so,  
52 the Company will have achieved jurisdictional harmony contrary to long-standing  
53 jurisdictional methodologies that support a 4 CP allocator and at a higher cost to  
54 Missouri ratepayers. In this time of heightened awareness of customer affordability,  
55 Every Metro's ratepayers should not have to pay more for jurisdictional harmony.

56 **Q IN HIS DIRECT TESTIMONY, DID MR. WOLFRAM ACKNOWLEDGE THE 4 CP**  
57 **METHODOLOGY WAS MORE APPROPRIATE THAN A 12 CP METHODOLOGY?**

58 A Yes, he did, and I included his remarks in my Direct Testimony.



79    **Q     WHAT ARGUMENTS DID MR. GUNN OFFER FOR OPPOSING YOUR**  
80           **RECOMMENDATION?**

81    A     Mr. Gunn argues that by only proposing a one-way tracker, the Company is assuming  
82           all the risk associated with revenues not achieving the level that has been proposed.

83    **Q     DO YOU AGREE WITH MR. GUNN'S ARGUMENTS?**

84    A     Partially, I would agree that establishing a one-way tracker could be argued to shift  
85           some risk onto the utility. However, establishing a reasonable revenue level for tracking  
86           reduces the risk of not achieving the assumed revenues.

87    **Q     WHAT ARE THE DIFFERING LEVELS OF LARGE LOAD REVENUES PROPOSED**  
88           **BY CERTAIN PARTIES IN THIS RATE CASE?**

89    A     The Company originally proposed a large load revenue stream of \$16.1 million.  
90           However, that level was adjusted before the Direct Testimony filing to approximately  
91           \$25 million. In his Rebuttal Testimony, Mr. Gunn updated the large load revenue  
92           estimate to \$43 million. Meanwhile, the Staff filed its Direct Testimony estimating a  
93           large load revenue estimate of approximately \$51 million. Clearly the recent large load  
94           revenues estimates are significantly greater than the \$25 million included in the  
95           Company's revenue deficiency calculation.

96    **Q     WHAT LEVEL OF LARGE LOAD REVENUES DO YOU PROPOSE TO BE**  
97           **INCLUDED IN THIS RATE CASE?**

98    A     I propose to include \$25 million for the large load revenue offsets.

99     **Q     HOW DOES THAT LEVEL OF LARGE LOAD REVENUES ADDRESS MR. GUNN'S**  
100     **ARGUMENTS FOR A SYMMETRICAL REVENUE SHARING PROPOSAL?**

101     A     That level of large load revenues presents little risk that those revenues would not be  
102     recognized in any one year. Therefore, at that level (\$25 million), I continue to support  
103     a one-way revenue tracker.

104     **Q     DID THE STAFF SUPPORT YOUR POSITION?**

105     A     Staff witness, Sarah Lange, found my position as more straightforward than the  
106     Earnings Sharing Mechanism ("ESM") proposal advanced by Google LLC's witness  
107     Dr. Carolyn A. Berry.<sup>1</sup>

108     **Q     WHY DO YOU BELIEVE YOUR PROPOSAL IS SUPERIOR TO AN ESM?**

109     A     I believe my proposal is superior to an ESM because my proposal focuses solely on  
110     the large load revenue issue and does not consider other factors of the Company's  
111     revenue requirement.

112     **Q     DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

113     A     Yes, it does.

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<sup>1</sup>See Rebuttal Testimony of Sarah L.K. Lange at page 14, lines 21-22.