Exhibit No.:	
Issue:	Normalized Retail Revenues; Rate Design; CCOS
Witness:	Graham A. Jaynes
Type of Exhibit:	Surrebuttal & True-Up Direct Testimony
Sponsoring Party:	Evergy Missouri Metro
Case No.:	ER-2026-0143
Date Testimony Prepared:	September 10, 2026

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2026-0143

SURREBUTTAL TESTIMONY

OF

GRAHAM A. JAYNES

ON BEHALF OF

EVERGY MISSOURI METRO

Kansas City, Missouri
September 2026

Table of Contents

SURREBUTTAL TESTIMONY

OF

GRAHAM A. JAYNES

Case No. ER-2026-0143

I. Introduction

Q. Please state your name and business address.

A. Graham A. Jaynes. My business address is 1200 Main, Kansas City, Missouri 64105.

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

A. I am employed by Evergy Metro, Inc. and serve as Manager - Regulatory Affairs for Evergy Metro, Inc. d/b/a as Evergy Missouri Metro ("EMM"), Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("EMW" or "Company"), Evergy Metro, Inc. d/b/a Evergy Kansas Metro ("EKM"), and Evergy Kansas Central, Inc. and Evergy South, Inc., collectively d/b/a as Evergy Kansas Central ("EKC") the operating utilities of Evergy, Inc.

Q. Are you the same Graham A. Jaynes who previously filed direct and rebuttal testimony in this case?

A. Yes.

Q. On whose behalf are you testifying?

A. I am testifying on behalf of EMM ("Evergy" or the "Company").

Q. What is the purpose of your testimony?

A. My surrebuttal responds to issues raised by Staff and MECG after my rebuttal testimony concerning normalized revenues, class cost of service, non-residential rate design, LLPS treatment, the Critical Peak Rate proposal, and income-eligible rate design. Where an issue has already been addressed in my direct or rebuttal testimony, I do not repeat the full discussion and instead identify the limited point requiring surrebuttal.

Q. Are you attempting to address every criticism in the same level of detail?

A. No. Many of the criticisms overlap or arise from the same underlying disagreement. My testimony groups related issues together and focuses on whether the criticism changes the Company's recommendation. In most cases, it does not.

II. Normalized Revenues and Billing Determinants

Q. Staff raises concerns regarding customer counts, customer growth, and weather-normalized rate blocks. Do those issues change your overall revenue normalization recommendation?

A. No. Staff's concerns around Usage per Customer ("UPC") and Normal Usage Per Customer ("NUPC") illustrate a dispute of methodological preference rather than demonstrated forecasting accuracy. Staff assumes that a change in weather-normalized usage necessarily requires a change in block distribution. That assumption may be reasonable in some circumstances and unreasonable in others. Staff did not provide any validation analysis demonstrating that its NUPC-based methodology more accurately predicts actual billed block usage than preserving observed block relationships. Instead, I contend that making modeling moves towards aggregate accuracy and away from granular imprecision is directionally preferred. More detailed treatment does not inherently offer a more accurate outcome, especially when working with class/voltage normalization. Instead, normalization should occur at the most aggregate level as reasonably possible to avoid introducing unnecessary error margin.

Q. Should the Commission view those normalization disputes as broader rate design disputes?

A. No. They should not be overstated. To the extent Staff identifies a formula, timing, or customer-count issue, the appropriate response is to correct the calculation as necessary, not to reject the Company's broader rate design or class cost of service framework.

Q. Staff criticizes the Company's use of a 15-minute conversion factor rather than customer-specific 15-minute billing determinants for each restructuring step. How do you respond?

A. The criticism obscures the limited purpose for which the conversion factor is used and overstates the precision necessary to accomplish that purpose. The Company used the factor solely to translate billed 30-minute demand to an estimated 15-minute basis for purposes of establishing revenue-neutral rates in this proceeding. After this initial conversion in determinants, actual bills will be based on each customer's metered demand. The Company's approach reasonably recognizes that measured demand will increase when the interval is shortened and correspondingly reduces the price to preserve revenue neutrality. Staff would instead require the Company to evaluate approximately 34,000 customers, calculate individual interval changes, and process an extraordinary volume of interval data (in the billions of records) to potentially arrive at a comparable factor of converted determinants. For this limited purpose, that exercise is neither necessary nor proportionate, particularly when Staff has not demonstrated that it would produce a materially more accurate rate-design result.

Q. Did the Company ask Staff to clarify whether it considered the conversion factor itself unreasonable?

A. Yes. In Company Data Request 0508, the Company asked, "Does Staff conclude that EMM's 1.03042 conversion factor is unreasonable?" Staff responded:

> "Staff concludes that the calculation method of the 1.03042 conversion factor is unreasonable for use in establishing billing determinants in a rate case. Because EMM has not provided the information requested in DRs 468-476, Staff has not received the information necessary to conduct an analysis to determine an appropriate conversion factor."

Q. Is Staff's response persuasive?

A. No. Staff declares the Company's method unreasonable while simultaneously acknowledging that it has not performed the analysis necessary to identify an appropriate alternative factor. That is not an evidentiary basis for rejecting the Company's approach; it is an assertion of doubt unsupported by a competing analysis. The question is not whether every individual record can be evaluated separately, but whether the additional precision gained would materially improve the result. A generalized conversion factor provides a reasonable and statistically sound approximation of the overall population while avoiding substantial administrative effort to evaluate every individual record. Some individual observations may differ from the average, but the aggregate result remains reliable and fit for purpose.

Q. How should Staff have evaluated the Company's approach?

A. A constructive audit would test the data and methodology the Company actually provided, identify any material error, and propose a proportionate correction. Staff did not critique the Company's analysis of 15-minute maximum demand for commercial and industrial customers, quantify any alleged bias in the 1.03042 factor, or demonstrate that customer-level processing would materially improve the result. Instead, Staff insists that billions of interval records are indispensable and treats the absence of that exercise as proof that the Company's method is unreasonable. The logic is circular. Staff cannot fairly condemn the

Company's supported and administratively proportionate approach merely because Staff elected not to perform an alternative analysis using the information available.

III. Class Cost of Service Study

A. CCOS Study Role in this Case

Q. Staff and MECG both address the Company's class cost of service study. Has your position changed?

A. No. No criticism raised in rebuttal changes any recommendation I have made.

Q. What is the CCOS study being used for in this case?

A. Less than it is often used for, and that is deliberate. In this case the study does three things. It shows directionally where each class stands relative to its cost of service. It informs the non-residential rate design work. And it tests whether anything has changed since the Company's last rate case that should inform rate design or cost allocation. It does not do several things it is sometimes asked to do. It does not drive class revenue shifts, because the Company proposed an equal percentage increase rather than shifts. And it does not establish LLPS cost responsibility, because no LLPS customer was active during the Test Year. The study's role in this case is directly related to what the available information supports.

Q. Does that narrow purpose mean the study is unreliable?

A. No. A narrow purpose is a deliberate choice about how far to extend the results, not a defect in the study that produced them. The Company understood at the time of filing that new large loads and a simultaneous class restructuring introduced uncertainty, and that awareness is what determined how the study was used. It is why the Company filed two versions rather than one, so the effect of the restructuring could be seen separately from everything else. It is why the Company recommended an equal percentage increase rather than moving revenue responsibility between classes. Staff's primary criticism and the Company's recommendation are premised on the same fundamental issues. Where the parties differ is that Staff treats the uncertainty as a reason to disregard the study, while the Company treated it as a reason to limit what the study is asked to support.

Q. Staff, MECG, and OPC each raised methodological criticisms, but each worked within the Company's model rather than constructing an alternative study. How do you interpret that?

A. I read it as reflecting the same recognition that shaped how the Company used the study: this Test Year is a difficult vantage point from which to resolve methodological questions. The LLPS subclass is represented by a proxy customer and the non-residential class structure is being re-envisioned. Those conditions make it hard to test one allocation method against another on evidence rather than assumption. That type of work is better done in the next general rate proceeding, when actual LLPS demand, revenue, and usage are observable and the restructured rates have been in effect long enough to show how class composition settles.

B. CCOS Study Reliability

Q. Are the methods used in this CCOS study the same methods the Company has used in prior cases?

A. Yes, with one exception. The Company has filed a class cost of service study in every rate case since 2005, and the methodologies used here are consistent with those used in the Company's last rate case. The functionalization, classification, and allocation framework is the same embedded cost approach the Commission has reviewed before. The production and transmission allocator is the same A&E 4CP method. The one methodological change of consequence is the disaggregation of primary distribution between single-phase and three-phase, which the Company performed in response to a commitment made in the prior Evergy Missouri West case and which I address below. This is not a CCOS study the Commission is encountering for the first time.

Q. Staff recommends that the Commission not rely on the Company's study for revenue allocation or rate design. Do you agree?

A. No, and the recommendation is not consistent with what the CCOS study is intended to support. A CCOS study is reliable, or not, for a particular purpose. Staff's recommendation would be more relevant if the Company were asking the Commission to move substantial revenue responsibility between classes on the strength of these results. It is not. The Company proposed applying the increase equally. The question before the Commission is whether the CCOS study is reliable enough to support the directional conclusions the Company drew and to inform the non-residential rate design work. It is.

A study is also not invalid because some of its inputs are disputed. Every cost of service study requires informed judgment, and reasonable analysts reach different judgments on questions like minimum system design and allocator selection. Staff's own analysis demonstrates the point. Staff substituted the allocators it prefers into the Company's model and produced ordered, interpretable class results that differ modestly from the Company's.

C. Specific Criticisms

Q. MECG witness York supports retaining A&E 4CP and rejects OPC witness Nelson's POD proposal. Is that consistent with your rebuttal testimony?

A. Yes. My rebuttal testimony explained why A&E 4CP remains the appropriate method for allocating production and transmission plant and why OPC's POD proposal effectively moves capacity cost allocation toward an energy allocator. Ms. York reviewed the Company's study independently and reached the same conclusions on both points. Her support is meaningful because a change in allocation method is traditionally accompanied by a significant change in the system or in how it is operated. No such change has occurred here that would warrant departing from the method the Company has used and the Commission has reviewed in prior cases. Staff raises additional criticisms of the A&E 4CP method, and I address the production and transmission applications separately below.

Q. Staff criticizes the Company's use of the A&E 4CP allocator for production plant. How do you respond?

A. The dispute is narrower than it appears. Staff does not reject the average and excess framework. Staff contests which measure of class peaking feeds the excess component, coincident or non-coincident. Both measures are drawn from the same four summer months, which is why the two produce similar results. Ms. York recalculated the allocator on a non-coincident basis and reports that both the allocation factors and the resulting class rates of return are similar under either approach. Staff's own recalculation shows the same pattern, with Lighting the only class that moves materially. Ms. York observes that the Company's four highest system peaks occurred in June through September, with the monthly peaks in other months substantially lower. That is the load characteristic the allocator is built to reflect.

Q. Is it reasonable to use the same allocator for transmission plant?

A. Yes. Transmission plant serves a similar function as production plant in this respect: it exists to deliver capacity to load when the system is called upon, and it is planned and sized against those same conditions. On this system those conditions occur in the summer months. Using different peak measures for the two would assign a class one level of responsibility for the generation built to serve its peak and a different level for the transmission built to deliver it, when both were built against the same requirement.

Q. Taken together, do Staff's criticisms of the production and transmission allocators change your recommendation?

A. No. Neither criticism identifies an error in the study. Each identifies a different choice Staff would have made within the Company's long-standing analytic framework. The results under Staff's preferred choices differ from the Company's by margins that would not change what the Company proposed. The Company recommended an equal percentage increase across all classes. That recommendation would be the same under either allocator.

Q. Staff and OPC criticize the minimum system method and related distribution classification inputs. Have you already addressed that issue?

A. Yes. My rebuttal testimony addressed the minimum system method in response to OPC, and my position is unchanged. The method is a recognized and widely used approach for identifying the customer-related portion of distribution investment. Staff's additional criticisms are directed at specific implementation choices within the method rather than at whether the method itself is reasonable. I address both points below.

Q. Does Staff propose eliminating the customer classification of distribution costs?

A. No. Staff proposes a different method for measuring it. Witness Lange states a preference for a zero-intercept study for the classification of customer-related costs, and describes the choice between that approach and the Company's minimum system study as an opinion. A zero-intercept study is a different method of identifying the customer-related portion of distribution plant. The NARUC passage witness Lange quotes makes the same point, observing that comparative studies show the minimum-size method generally produces a larger customer component than the zero-intercept method. Both methods produce a customer component. They differ in how large it is.

That is the nature of the disagreement here. A different analyst could make different selections, and the resulting customer-related component would be somewhat larger or somewhat smaller. This kind of disagreement moves the magnitude of the result, it does not move its direction.

Q. What are the consequences of the Company's classification, and how has the Company accounted for them?

A. There are two. The first is that the customer-classified portion of distribution cost is allocated among classes on the basis of customer counts rather than demand, which affects each class's cost responsibility. Classifying cost as customer-related assigns relatively more of the distribution system to classes made up of many smaller customers and relatively less to classes with fewer, larger ones. That direction is a function of the classification itself, and it holds whether the customer-related component is calculated as the Company calculated it or somewhat differently. The Company did not, however, recommend the Commission directly follow the resulting class responsibility figures. Instead, I proposed an equal percentage increase across all classes, so this classification does not drive a revenue shift in this case.

The second consequence follows from the first. Once class cost responsibility is established, the customer-related cost per residential customer informs what a cost-based customer charge would be. The Company's study identifies customer-related costs of $41.18 per residential customer per month on a full basis and $18.33 per month on a more narrowly defined basis. The Company proposed $13.82, below the bottom of its own range. Here again the direction is what carries the recommendation. If the Commission were persuaded by some of Staff's implementation criticisms, the customer-related cost would be lower than the study indicates, but would still remain above the charge the Company proposed. My recommendation is informed by a range of analytic choices rather than only on the COSS study's direct output.

Q. Staff criticizes the Company's primary single-phase and three-phase distribution refinement. How do you respond?

A. The Company's refinement was intended to better align distribution costs with the facilities used to serve customers. My direct testimony explained that primary three-phase facilities are distinguishable from primary single-phase facilities and that the refinement improves cost causation.

Witness York reviewed the refinement independently and concluded that it directly addresses a cost-causation deficiency, that it is a meaningful improvement to the study's methodology, and that the directional effect of the change is appropriate. Staff does not disagree with the delineation itself. Staff states that it is not opposed to delineating the primary system between three-phase and single-phase so long as the delineation is reasonably made. Staff's disagreement is with how the Company calculated the split. A different calculation would change the size of the correction. It would not change its direction, and it would not support returning to an undifferentiated allocation that assigns primary voltage customers a share of facilities that do not serve them.

Q. Please summarize your position on the Company's CCOS study.

A. The study uses established methods, and its role in this case was deliberately limited to what the available information supports. The criticisms raised in rebuttal identify analytic choices rather than deficiencies in the study, and those choices move the magnitude of a result rather than its direction. None of them changes what the Company recommended, and that is by design.

As discussed in my direct and rebuttal testimonies, the Company also recognizes the study's limitations. The LLPS subclass is represented by a proxy customer and the non-residential class structure is embarking upon a transition. I specifically address the LLPS issues separately in Section V. Those conditions will not persist. Actual LLPS data and observed non-residential class composition after migration will support a fuller analysis in the next general rate proceeding, which is the setting in which the methodological questions raised here can be tested on evidence rather than assumption. For this case, the CCOS study is reliable for the directional conclusions the Company drew from it, and those conclusions support the Company's recommendations.

Q. Staff mentioned a distinction from their recommendation in the Company’s inclusion of rates not generally subject to change. Do you have any response?

A. Yes, it is not the intent of the Company to increase any of the non-general rate case rates in the equal increase application. Only rates included in the Company’s pricing workpapers will be increased and to the extent that any inclusion of non-base rate revenue charges are identified in any class revenue totals, we agree it will be excluded from determinant tables.

IV. Non-Residential Rate Design Implementation

A. Hours Use Replacement

Q. Do Staff and MECG continue to agree with parts of the Company's non-residential rate design proposal?

A. Yes. Staff and MECG generally recognize the need to move away from the existing Hours Use structure and improve non-residential rate design. The remaining disputes concern implementation timing, rate period details, customer communication, and some pricing refinements. Staff has some additional reservations around "high differential" offerings citing opportunities for cost avoidance.

Q. Does Staff's continued support for moving away from Hours Use reinforce your recommendation?

A. Yes. Staff's criticism of Hours Use is consistent with the Company's direct testimony and the Brattle analysis. The disagreement is not whether Hours Use should be replaced, but whether replacement should occur now or after an unnecessary delay.

B. Pricing Periods

Q. What changes does Staff witness Lange recommend to the Company's proposed billing-demand windows?

A. Staff recommends expanding the summer billing-demand window to 10:00 a.m. through midnight, rather than the Company's proposed 3:00 p.m. through 7:00 p.m. window. Staff also recommends a 6:00 a.m. through midnight window during the non-summer months, rather than the Company's proposed 9:00 a.m. through 9:00 p.m. window. I do not agree with those changes. The Company's proposal better balances cost reflectivity, customer understandability, and the practical ability of customers to respond.

Q. What is the fundamental difference between Staff's approach and the Company's approach to defining those periods?

A. The Company relied on Brattle's analysis of total hourly system costs, including generation capacity, transmission and distribution capacity, and energy costs, as shown in Figure 10 of the Brattle report. Staff instead reviewed the months and hours of historical EMM peaks relied upon by SPP. Staff's testimony does not clearly identify whether those peaks reflect gross or net system load, which EMM load grouping was evaluated, or whether the analysis is specific to non-residential customers. Those distinctions are important because the pricing periods should reflect the costs the rate is intended to signal, not merely the timing of an undefined historical peak measure.

Q. Why is a historical gross-load measure an incomplete basis for defining future pricing periods?

A. A historical gross-load measure does not account for the effect of renewable generation on net system requirements or for how the system may evolve. For example, additional solar generation may shift the net system peak to later hours in the day. Brattle's total-system-cost analysis captures a broader set of cost drivers and is therefore a more appropriate basis for establishing pricing periods. That conclusion is also consistent with Staff witness Lange's support elsewhere in her testimony, including at page 32, for Brattle's method of calculating system costs.

Q. Staff expresses concern that ending the Company's summer peak period at 6:00 p.m. could create a rebound in customer usage and a new peak at 7:00 p.m. How do you respond?

A. First, Staff's testimony incorrectly states that the Company's proposed peak period ends at 6:00 p.m.; it ends at 7:00 p.m. Second, Figure 10 of the Brattle report indicates that, if the summer peak window were expanded, the cost support is stronger for adding earlier hours, such as 1:00 p.m. through 3:00 p.m., than for extending the period later into the evening. More importantly, a six-hour or longer peak window is less customer-friendly and can make it more difficult for customers to adjust operations or shift discretionary load. The Company's four-hour window concentrates the price signal in the hours most strongly supported by the total-system-cost analysis.

Q. Does the Company's design require customers to move peak-period usage into the super-off-peak period?

A. No. The objective is to encourage customers to reduce or move usage away from the peak period, not necessarily to move that usage into the super-off-peak period. A customer may receive the same financial benefit by moving usage that otherwise would occur during the 3:00 p.m. hour to either the 2:00 p.m. hour or an hour after the peak period ends. Staff's concern that customers cannot realistically shift load from after 3:00 p.m. to before 6:00 a.m. therefore does not address how the Company's price signal is intended to operate.

Q. Is Staff's broader summer peak window more responsive to customer concerns?

A. No. Staff's proposed 3:00 p.m. through 9:00 p.m. peak period would require customers to avoid a longer portion of the day and may make operational adjustments more difficult. Experience with the Kansas transition indicates that customers did not have material difficulty understanding or responding to a 3:00 p.m. through 7:00 p.m. peak period. The Company's narrower window is therefore both more actionable for customers and more closely aligned with the hours identified by the total-system-cost analysis.

C. Energy Charge

Q. Staff witness Lange recommends separate morning and evening peak periods during the non-summer months. Do you agree with that recommendation?

A. No. I agree that non-summer energy prices exhibit a morning and evening peak pattern, as shown originally in Figure 10 of the Brattle report. However, the relevant question is whether the relatively small difference in energy prices warrants the added complexity of Staff's proposed design. In my view, it does not.

Q. How large is the non-summer energy-price differential identified by Staff?

A. It is modest. During the non-summer months, average energy prices are approximately 4.28 cents per kilowatt-hour from 7:00 a.m. to noon and 3.99 cents per kilowatt-hour from 3:00 p.m. to 9:00 p.m., the two periods Staff proposes to designate as peak. By comparison, average energy prices are approximately 1.47 cents per kilowatt-hour from midnight to 7:00 a.m. and 2.99 cents per kilowatt-hour during the remaining hours.

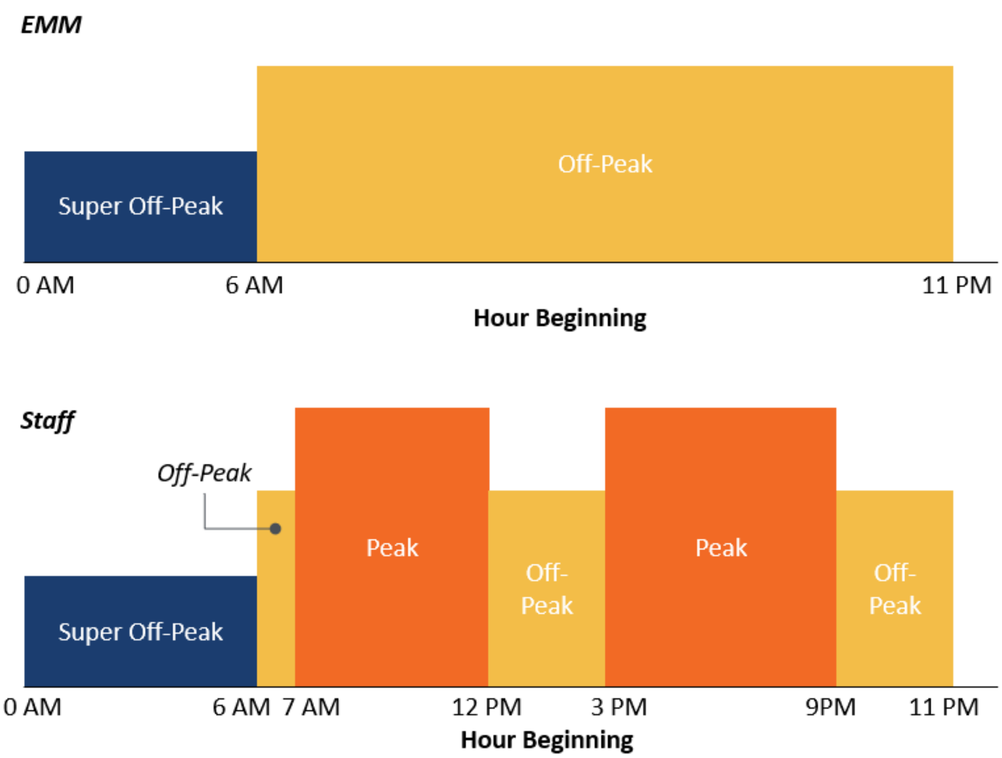
Q. Does the Company's proposal already recognize the lower non-summer overnight energy cost?

A. Yes. The Company's proposal includes a one-cent-per-kilowatt-hour super-off-peak credit during the non-summer months. That credit recognizes the more meaningful overnight price differential without requiring customers to navigate multiple peak and off-peak periods throughout the day.

Q. Why do you prefer the Company's simpler non-summer design?

A. Staff's design would create six pricing periods over the course of a non-summer day, compared with two under the Company's proposal. As illustrated in Figure 1 below, that added complexity is unlikely to produce a meaningful customer response when the price difference between the proposed morning and evening peak periods and the surrounding hours is comparatively small.

<u>Figure 1</u>



Rate design necessarily requires a balance between cost reflectivity and customer usability. In this instance, the Company's design provides a clearer and more actionable price signal while still recognizing the material overnight cost differential.

D. Time of Use

Q. Staff and MECG raise concerns regarding optional TOU and highly differentiated rates. Should the optional TOU rate be preserved?

A. Yes. As explained in my direct and rebuttal testimony, the optional TOU provides a voluntary option for customers capable of responding to stronger price signals. Because it is optional, it preserves customer choice without imposing the structure on customers that cannot respond.

Q. Staff witness Lange states that she does not support highly differentiated opt-in rates that allow customers to avoid responsibility for reasonably allocated costs of service. Does that concern apply to the Company's optional TOU proposal?

A. No. Both the replacement rates and the proposed optional TOU rates are designed to be cost-reflective and revenue neutral. Customers who consume electricity during higher-cost system peak periods pay more, while customers who consume during lower-cost off-peak periods pay less. That outcome is not an avoidance of revenue responsibility; it is the intended result of assigning prices to better reflect when costs are incurred.

Q. Is that principle consistent with Staff's own recommendation to include a price differential in the standard rate?

A. Yes. Staff's proposed on-peak and off-peak differential applies the same underlying time-varying rate principle, although with a milder price signal. In either design, customers pay different prices depending on when they use electricity. The optional TOU rate simply provides a voluntary, more highly differentiated alternative for customers that are able and willing to respond to stronger price signals. Because the rate is cost-reflective, revenue neutral, and optional, Staff's general concern about customers avoiding allocated cost responsibility does not provide a basis to reject it.

E. Implementation Delay

Q. Staff and MECG support a transition or delay to allow additional customer-specific analysis. Why do you oppose that approach?

A. Because delay is not neutral. My rebuttal testimony explained that a one-year delay would preserve the very rate structure the parties agree should be replaced, delay improved price signals, and risk customer confusion from sequential changes. Additional customer notification can occur without delaying implementation of the approved rate structure.

Q. If Staff wants customer-specific bill impact information, does that require delaying implementation?

A. No. A report that does not lead to a specific adjustment is an administrative obstacle, not a reason to postpone rate modernization.

Q. Staff and MECG address retaining or freezing the TRP rate. What is your response?

A. The Company's direct testimony explained that TRP is a legacy rate with very limited participation and that the optional TOU rate is the appropriate replacement path. If the Commission is concerned about immediate movement of existing TRP customers, a narrow mitigation for those customers is different from preserving the existing structure generally or delaying the broader restructuring. In the rebuttal testimony of Sarah Lange on page 69, Staff states:

> "Staff has concerns with the pricing and design of the TRP tariff. However, a well-designed TRP tariff could meet the customer desires that underlie optional highly differentiated opt-in TOU tariffs."

Staff's own statement justifies the Company's proposed approach. Staff acknowledges that the relevant customer objective is access to a well-designed, highly differentiated, opt-in TOU option. The Company's proposed C&I optional TOU rate is designed to meet that objective directly, while providing a cost-reflective and revenue-neutral alternative for customers that are able and willing to respond to stronger time-varying price signals. Staff does not explain why that same customer objective requires preservation of a separate legacy TRP tariff once the optional TOU rate is available. Retaining the TRP as a frozen rate for only three participating customers would therefore duplicate the function of the proposed optional TOU offering, perpetuate a tariff that Staff itself identifies as having pricing and design concerns, and require the Company to administer two rates intended to address the same underlying function. Accordingly, approval of the optional TOU rate supports discontinuing the TRP.

Q. If the TRP rate was frozen and maintained, would you support the current structure?

A. No. Recalibration would be necessary. The TRP Rate would need an increase in excess of the jurisdictional increase to bring it closer in alignment to that of the TOU equivalent. If it were to be retained, I propose an additional 4.73% revenue should be recovered from the TRP rates in addition to the jurisdictional increase which should be distributed across energy pricing. This is the result of comparing true-up $/kWh for 1PGPT ($.07902) against the 1PGSE ($.08276). An increase following this logic would not correct calibration, but it would directionally bring alignment in recovery, removing a barrier towards further enhancement or replacement.

Q. Staff criticizes removal of reactive demand charges for MGS and LGS. Do you continue to support removal?

A. Yes. Despite Staff witness Lange's assertion that no justification was provided, The Company has previously presented testimony supporting removal of the reactive demand charges from the Medium General Service and Large General Service classes to better align their treatment with Evergy Missouri West. As my direct and rebuttal testimony explained that reactive demand revenue for those classes is minimal and that eliminating the charge improves tariff simplicity while maintaining revenue neutrality within the class. Staff's general concern about restructuring does not justify preserving this legacy charge and misalignment to Missouri West.

V. LLPS Issues

Q. Staff raises additional concerns regarding LLPS revenue, Customer A, and the CCOS treatment of LLPS. How should the Commission view those issues in your testimony?

A. Staff testimony does not adequately give credit to the timeline of events and the Company's forthcoming treatment of LLPS revenue. In this case, the Company proactively estimated LLPS revenue at true-up. Once a known and measurable ESA with a quantifiable minimum contract amount was signed (after the development of the Company's direct case), proactive adjustments to retail revenue were made in the update period provided to Staff. In True-up the Company resolves this series of events by recognizing actual activity annualized. My testimony has balanced known and measurable information with actual observations to minimize misstatements about LLPS activity. From my perspective, the key point remains that LLPS activity is transitional and should be treated cautiously until actual usage, demand, and revenue data are available. This is consistent with the Stipulation and Agreement resulting from EO-2025-0154 establishing the LLPS tariff.

Q. Staff argues that the Company's LLPS CCOS treatment understates costs and overstates LPS class returns. Does that change your revenue allocation recommendation?

A. No. It reinforces it. The Company did not rely on the CCOS to propose large class revenue shifts in this case. Instead, the Company recommended an equal percentage increase in part because LLPS costs, revenues, and usage patterns are still developing.

Q. Staff states that LLPS rates should increase by the same percentage as other classes. Is that consistent with your position?

A. Yes, in the sense that the Company has proposed maintaining the relationship between LLPS and LPS rates through this case. My rebuttal testimony explained that preserving the relationship is more appropriate than freezing LLPS rates while increasing LPS rates.

Q. Does Staff's discussion of alternative LLPS rate levels based on capacity costs change your recommendation?

A. No. A capacity-cost comparison may be useful as a future analytical input, but it should not replace the tariff framework, settlement context, or the need for known and measurable customer data. The appropriate approach in this case is to apply the general increase and continue monitoring LLPS as actual data develops.

Q. Staff raises issues regarding Customer A minimum billing. Are you the primary witness for that issue?

A. No. While my testimony does cover a range of LLPS elements Company witness Bradley Lutz addresses the LLPS minim bill concerns.

Q. What did Staff say regarding the LLPS premium?

A. In the rebuttal testimony of Staff witness Sarah Lange in footnotes on page 4, Staff states:

> "In his direct testimony at page 5, EMM witness Graham Jaynes testifies that for its revenue requirement calculations, EMM included $16.1 million in LLPS revenue as a pro forma adjustment, and additional revenues of $9.1 million are reflected. In its CCOS, EMM reflected ***REDACTED*** in LLPS subclass revenue, and included an "LLPS Premium" of $3.8 million. **This "LLPS Premium" appears to be calculated as related to factoring up LLPS revenues for the increase EMM requested in this case.**"
> *(Bolded for emphasis)*

Q. Is this an accurate characterization?

A. No. Staff's description does not accurately reflect the purpose and origin of the LLPS premium as included in the Company's direct case. Staff appears to characterize the LLPS premium as though it were calculated by grossing up LLPS revenues for the requested rate increase. That interpretation is not appropriate because it does not account for the Stipulation and Agreement approved in Docket No. EO-2025-0154.

Q. What does the Stipulation and Agreement from EO-2025-0154 have to do with the LLPS premium?

A. The "LLPS premium" resulted from this agreement, specifically Section 14 Initial Pricing Subsection i:

"i. The Signatories agree that the Company will compare Schedule LLPS customer base rate kilowatt-based revenue collections under the rates in Exhibit A to this Agreement during the period utilized for evaluation for Class Cost of Service ("CCOS") Study proposed in the next general rate proceeding to base rate kilowatt-based revenue collections that would have occurred for the same customers under Schedule LPS and the difference in revenues will be identified and reallocated to non-Schedule LLPS customer classes for CCOS study purposes only in determining sufficiency of class recovery of costs of service."

Q. Does the Company believe that LLPS rates should be factored up for the requested increase as described by Staff?

A. No. As explained in my rebuttal testimony, factoring up LLPS revenues in that manner improperly blends revenue requirement and rate design which risks creating confusion in the case record.

VI. Critical Peak Rate

Q. Staff updates its Critical Peak Rate proposal to address AMI opt-out customers. Does that resolve your concerns?

A. No. It reinforces my concerns. My rebuttal testimony explained that the CPR proposal introduces a mandatory weather-event surcharge without demonstrated, quantifiable benefits. Adding a separate AMI opt-out treatment makes the proposal more administratively complex and further highlights that the design has not been sufficiently developed.

Q. Why is the AMI opt-out update significant?

A. It shows that implementation details remain unresolved. A CPR rate depends on timely, accurate event measurement and customer communication. If customers without AMI require a separate event-day charge, that raises additional questions about fairness, customer understanding, and whether the rate will produce the behavioral response Staff assumes.

Q. What is your recommendation on Staff's CPR proposal?

A. The Commission should reject the CPR proposal in this case. If Staff or another party believes a critical peak design should be explored, it should be developed through a more complete process that evaluates costs, benefits, customer impacts, operational feasibility, and alternatives such as voluntary demand response or rebate-based programs.

VII. Income-Eligible Rate

Q. Staff comments on how a revenue shortfall could be recovered if an income-eligible customer charge waiver is approved. Does that change your recommendation?

A. No. Staff's comment addresses only one element of a potential design: cost recovery. It does not resolve eligibility, participation, verification, administrative cost, customer impact, interaction with other assistance programs, or whether a customer charge waiver is the best policy tool.

Q. Staff references a $1.44 million shortfall if 12,000 customers receive a waiver. Is that complete?

A. No. That calculation illustrates the importance of quantification, but it is not a comprehensive program analysis. The eligible population could be larger or smaller, participation could vary materially, and administrative costs and late-fee impacts would also need to be evaluated. Additionally, for accuracy - the quantified $1.44 million was inadvertently understated within Staff rebuttal testimony. I have confirmed with Staff witness Lange that the intended 12,000 customer quantification would result in $1.728 million in revenue deficit to be recovered from other classes at the current $12 customer charge.

Q. What is your recommendation regarding an income-eligible rate in this case?

A. The Commission should not approve an income-eligible customer charge waiver in this case. The issue should be evaluated through the appropriate working docket and, if supported, brought forward in a future rate case with a complete record.

VIII. Closing

Q. Have any of the issues raised in Staff or MECG testimony caused you to change your recommendations?

A. No. With the exception of any error corrections, the additional testimony reinforces the need for a measured outcome: approve the Company's non-residential rate modernization without a broad delay, preserve the optional TOU offering, reject the CPR proposal, avoid premature LLPS-driven class shifts, and maintain the Company's equal percentage revenue allocation in this transitional case.

Q. Does this conclude your testimony?

A. Yes, it does.

TRUE-UP DIRECT TESTIMONY

OF

GRAHAM A. JAYNES

Case No. ER-2026-0143

I. INTRODUCTION

Q. Please state your name and business address.

A. Graham A. Jaynes. My business address is 1200 Main, Kansas City, Missouri 64105.

Q. Are you the same Graham A. Jaynes who previously filed direct and rebuttal testimony in this case?

A. Yes.

Q. On whose behalf are you testifying?

A. I am testifying on behalf of Evergy Missouri Metro.

Q. What is the purpose of your testimony?

A. The purpose of my true-up direct testimony is to discuss changes to the retail revenue adjustment.

Q. Please describe the process used to true-up retail revenues related to non-"Customer A & B" as named by MPSC Staff.

A. The true-up adjustment for retail revenues reflects customer growth, energy efficiency, and accounts for the customers switching rate classes where applicable through June, 2026. In addition, as discussed in Company witness Albert Bass's surrebuttal testimony the Company adjusted weather normalization period to January through December 2025 which aligned with MPSC Staff's direct case.

Q. Please describe the process used to true-up retail revenues related to "Customer A" and "Customer B".

A. For Customer A, known and measurable information as of June, 2026 was used to annualize 12 months of activity at the June, 2026 level. This reflects the increased activity observed during true-up.

For Customer B, normalization included adjusting to 12 months ending June, 2026 activity. This is appropriate for Customer B as supported through my rebuttal testimony, Customer B is a LPS customer without observable LLPS behavior and commitments.

Q. Does this conclude your true-up direct testimony?

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 Implement A General Rate Increase for Electric Service	))))	Case No. ER-2026-0143

AFFIDAVIT OF GRAHAM A. JAYNES

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Graham A. Jaynes, being first duly sworn on his oath, states:

1. My name is Graham A. Jaynes. 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 Testimony on behalf of Evergy Missouri Metro consisting of twenty-seven (27) 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.

Graham A. Jaynes

Subscribed and sworn before me this 10th day of September 2026.

Notary Public

My commission expires: April 26, 2029

ANTHONY R WESTENKIRCHNER
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 26, 2029
PLATTE COUNTY
COMMISSION #17279952