Exhibit No.:
Issue: Rate Design Strategy, Tariff Modifications, Rule & Regulations, and CCOS
Witness: Bradley D. Lutz
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Evergy Missouri Metro
Case No.: ER-2026-0143
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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2026-0143

SURREBUTTAL TESTIMONY

OF

BRADLEY D. LUTZ

ON BEHALF OF

EVERGY MISSOURI METRO

Kansas City, Missouri
September 2026

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SURREBUTTAL TESTIMONY

OF

BRADLEY D. LUTZ

Case No. ER-2026-0143

Q: Please state your name and business address.

A: My name is Bradley D. Lutz. 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. I serve as Director, Regulatory Affairs for Evergy Metro, Inc. d/b/a as Evergy Missouri Metro ("Evergy Missouri Metro"), Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West" or "EMW"), Evergy Metro, Inc. d/b/a Evergy Kansas Metro ("Evergy Kansas Metro"), and Evergy Kansas Central, Inc. and Evergy South, Inc., collectively d/b/a as Evergy Kansas Central ("Evergy Kansas Central") the operating utilities of Evergy, Inc. ("Evergy").

Q: Are you the same Bradley D. Lutz 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 ("EMM" or "Company").

Q: What is the purpose of your testimony?

A: The purpose of my Surrebuttal Testimony is to address Rebuttal Testimony presented by the Staff of the Missouri Public Service Commission ("Staff") and Renew Missouri ("Renew"). Those issues include:

1. Customer Counts
2. Commercial & Industrial Rate Design
3. Large Load Power Service
4. Bill Estimation & Bill Accuracy
5. Class Cost of Service
6. Reactive Demand Charges
7. Critical Peak Rate
8. Income Eligible Solar Subscription
9. Battery Storage Tariff

Given the number of witnesses and the distribution of topics, if I did not, or inadvertently failed to address an issue raised by any party, the absence of a response does not constitute agreement by the Company with that party.

1. CUSTOMER COUNTS

Q: Please describe your Surrebuttal Testimony concerning customer counts?

A: I will offer further context to the issue of customer counts to explain why the recommendation made by Kim Cox in her rebuttal testimony is unreasonable and unproductive.

Q: What is the Company's position concerning customer counts?

A: This was addressed in the Direct Testimony of Graham Jaynes. In summary, his testimony identified the two forms of customer counts in question, customer charge count and customer bill count, identified the commitment[1] made with Staff in ER-2024-0189 to

[1] ER-2024-0189 Unanimous Stipulation and Agreement, page 15, paragraph 21.
"Revenues for Future Cases:

determine which count is the appropriate count for use in Company rate cases going forward, and then explained either count method produces a similar result. Mr. Jaynes made the suggestion that Commission support using the customer charge count for rates that include that billing component and using bill count when customer charge is not available. This was an opportunity for Staff and the Company to resolve a preexisting disagreement that has persisted in our rate cases.

Q: What recommendation did Ms. Cox offer in Rebuttal Testimony?

A: Ms. Cox recommends the Commission order EMM to add the definitions to the tariff and to continue to provide both counts in general rate cases.

Q: Did Ms. Cox explain why Staff believes both values are still necessary?

A: Ms. Cox stated Staff has concerns about the accuracy of the data. The Company issued a data request to seek a better understanding of this concern. In response to data request #0509 attached as Exhibit BDL-2, reveals that Staff is also concerned that the values are not consistent from case to case. Ms. Cox also states, "Staff has used customer bill counts

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a. The Company and Staff agree to the following definitions related to customer count:

i. Customer Charge Count – The number of customer charges charged in a given billing month. This count is subject to fluctuations that might occur within the billing process such as partial and final bills. This count has a direct relationship to billing/revenues and is a specific billing determinant.

ii. Customer Service Agreement Count – The number of unique service agreements in the Company's billing system at a given point in time. This count is not directly linked to billing/revenues and is not a specific billing determinant. This count is not subject to billing fluctuations.

b. The Company shall provide the Customer Charge Counts and Customer Service Agreement Counts for all applicable test year, update, and true-up months, when available, in the next EMW rate case.

c. In the next EMW rate case, the Signatories will in good faith cooperate in evaluation of Customer Charge Counts and Customer Service Agreement Counts for usage per customer and shall determine which count is the appropriate count for use in Company rate cases going forward.

d. Customer Charge Counts shall be used for customer growth adjustments in future Company rate cases unless changed as a result of the evaluation detailed in Paragraph 21c."

to calculate the normal use per customer ("NUPC") and customer charge counts to calculate the customer growth for rate cases since approximately 2016."[2] The Company issued a data request to confirm it is Staff's intention to follow this approach going forward. In response to data request #0510 attached as Exhibit BDL-3, reveals that although Staff has not made a related recommendation, Ms. Cox supports using both counts, bill counts for NUPC and customer charge count for customer growth adjustments.

Q: Does the Staff Recommendation to provide both counts in this case resolve the issues that led to the ER-2024-0189 commitment?

A: No. After introducing the issue in a pre-filing review of our case and the filing of testimony and work papers, the only interaction to evaluate the count options occurred through discovery or testimony. Staff's recommendation perpetuates the current inefficiencies and could impede efforts to address the commitment to determine which count is the appropriate count for use in Company rate cases going forward.

Q: Why is the recommendation from Ms. Cox to continue providing both counts problematic?

A: In the Company's opinion, producing both counts creates more work and creates further opportunity for disagreement going forward. Staff's recommendation to produce both counts going forward for EMM is in opposition to Staff's commitment to, "in good faith cooperate in evaluation of Customer Charge Counts and Customer Service Agreement Counts for usage per customer and shall determine which count is the appropriate count for use in Company rate cases going forward."[3] It is unreasonable and unproductive to

[2] ER-2026-0154, Cox Rebuttal, page 4, line 17

[3] ER-2026-0189, Unanimous Stipulation and Agreement, October 2, 2026, page 15, paragraph 21.

reinforce the use of both customer counts in Missouri Metro with a pending commitment to resolve the count issue in a future Missouri West rate case.

As shown in Table 1 of Graham Jaynes Direct Testimony, the two counts are essentially the same, and there is no inherent benefit to one count over the other. If the Company and Staff could agree on a single count, we could go forward more efficiently. We could have resolved the point of the ER-2024-0189 commitment now.

Q: Do you support the related recommendation to define the counts in the Company tariff?

A: No. I do not support adding count definitions in the Company Tariff. The counts are only used in the determinations of revenues and adding the definitions to the tariff do not provide any value, particularly to customers or those outside of the rate case process. To better understand Staff's intent, a data request was sent to Staff to learn more about this recommendation. In response to data request #0510, Staff suggested these definitions be placed in the Company's General Rules and Regulations ("Rules"). This suggested placement does not change my view of the recommendation. The DEFINITIONS section of the Rules is used to define terms used within the Rules. Placing these unrelated terms there would not be helpful to customers or others referencing our tariffs. I checked the current Rules for the other Missouri electric utilities and did not see customer counts defined anywhere. The recommendation to define the customer counts in the Company tariff should be rejected.

2. COMMERCIAL & INDUSTRIAL RATE DESIGN

Q: Please describe your testimony concerning Commercial & Industrial ("C&I") rate designs.

A: My testimony will address two specific topics that are indirectly related to the rate design proposals themselves. Mr. Graham Jaynes will provide Surrebuttal Testimony concerning specific rate design issues.

Q: What is the first aspect of Rebuttal Testimony that you wish to address?

A: Sarah Lange offers testimony discussing the Company Facility Charge proposals and speaks to her view of the Unanimous Stipulation and Agreement in ER-2024-0189 and the commitment stating, "In the next EMW rate case, the Company will take additional steps to align facilities charges across classes, and will maintain consistent customer charge pricing within each class."[4] Ms. Lange offers,

> "This refers to a goal that a facilities charge for service at primary voltage be the same charge per kW, whether a customer is served in LPS, LGS, MGS, or SGS. Staff agrees with this goal, and implementation of this goal is consistent with EMM's stated interest in establishing consistency in rate structures and designs across its jurisdictions."[5]

I highlight this testimony as I do not share Ms. Lange's interpretation of this commitment. In my interpretation this is a two-part statement with the first being, "the Company will take additional steps to align facilities charges across classes", where the goal is to address the relative relationship between classes, ensuring the variations are consistent with variations observed in the costs. This could but is not expected to result in equal charges based on service voltage. The second part is, "will maintain consistent customer charge pricing within each class." Here I interpret this as moving to a single charge for each class.

Q: What is the next aspect of Rebuttal Testimony that you wish to address?

[4] id, page 14.
[5] ER-2026-0143, Rebuttal Testimony of Sarah Lange, page 68, line 4

A: Sarah Lange offers testimony discussing Customer Communications and Implementation Plans associated with the Company C&I rate design proposals, particularly her criticism that the Company did not offer fully developed customer education plans and timelines as part of its testimony nor has done so as of the time of her rebuttal.

Q: How do you respond to this criticism?

A: The Company was clear in its response to Staff Data Request 0238. There we stated in part,

> "Evergy does not normally prepare customer education plans as part of proposals made in its direct testimony. Historically, it has been common for intervenors in the general rate proceeding to disagree with all or part of a Company proposal. As a result, Company proposed rate changes can be changed dramatically during the course of the general rate proceeding. Efforts spent preparing detailed customer education plans would be imprudent. Instead, as the general rate proceeding progresses, if the Company believes a rate proposal is being found acceptable, more detailed planning, including the creation of customer education plans may occur. At its most extreme, should a proposal go to hearing and remain uncertain until the Final Order, detailed implementation planning will also wait."

Q: Has any certainty developed concerning the acceptability of the Company C&I rate design proposals?

A: No. In fact, Staff's continued recommendation that the C&I rate designs be delayed for a year further undermine our confidence and any willingness to invest any effort into detailing customer-facing plans.

Q: If the Commission orders all of the C&I rate designs as proposed by the Company, will the Company be prepared to execute customer education and be ready to support customers as the rate designs are implemented?

A: Yes. The Company will rely on its customer service experience and past rate case approaches to establish and execute a customer education plan inclusive of,

- Identification of customers affected by the approved rate design proposals,
- Detailed talking points concerning the purpose, operation, and effect of the approved rate design proposals,
- Educational materials (web-based, electronic or hard copy)
- Planned channels for communication

If agreement is not reached until the Final Order, some steps of the education plan will happen after the effective date of rates.

Q: Is it necessary that education steps be completed before rates are effective?

A: No. Post rate case customer education has been common. In my experience, Staff's inquiries about customer education plans for the Company rate design proposal are new, appearing for the first time in this case.

Q: Are there any other aspects of the rate implementation that should be addressed now?

A: Yes. The Company is requesting that the Commission allow the implementation of ordered rate and class changes based on the customer billing cycle date instead of on one fixed date for everyone. Rate changes, particularly changes that will move customers to new rate code, would result in prorated billing. Under a prorated bill, customers will receive a multi-page bill detailing part of their usage billed under the old rate and the remaining usage billed under the new rate. Applying the changes with the bill cycle would avoid this proration and provide a customer bill more like a normal bill. This approach was used most recently with the implementation of residential TOU rates.

3. LARGE LOAD POWER SERVICE

Q: Please describe your testimony concerning Large Load Power Service issues.

A: I will respond to the Rebuttal Testimonies of Brooke Mastrogiannis and Sarah Lange. My testimony will complement the Surrebuttal Testimonies of Graham Jaynes, Linda Nunn, and Kevin Gunn. The issues to be addressed include long-term capacity contracts, Section 393.130.7, RSMo. Compliance, minimum billing, and LLPS administration.

<u>Long-term Capacity Contracts</u>

Q: Have you reviewed the Rebuttal Testimony of Brooke Mastrogiannis concerning long-term capacity contracts?

A: Yes, I have. Ms. Mastrogiannis responds to the Direct Testimony of Linda Nunn and the proposed inclusion of long-term capacity sales and purchase contracts in the FAC going forward. Ms. Mastrogiannis rejects the proposal and cites the ***[redacted]*** in the context of Interim Capacity provisions of the Schedule LLPS tariff.

Q: Are you familiar with the *[redacted]*** and if yes, is it correct to consider it as Interim Capacity?**

A: I am familiar with the ***[redacted].***

Q: If utilized through *[redacted]*** trigger the double recovery concerns raised by Staff?**

A: No.

Q: Is Ms. Mastrogiannis describing the use of Interim Capacity correctly?

A: No. Due to the inefficient nature of the filing dates for non-Company Direct and Rebuttal Testimony, Ms. Mastrogiannis does not have the benefit of my Rebuttal Testimony before preparing her Rebuttal Testimony. My Rebuttal Testimony addresses the concerns Staff raised about Interim Capacity. More specific to the FAC, any Interim Capacity obtained by the Company on behalf of a customer would not be included in the FAC and instead would be paid for directly by the large load customer benefiting from optional and temporary form of capacity.

Q: Ms. Mastrogiannis recommends the Commission order additional FAC reporting for this specific contract. Do you support that recommendation?

A: No. The contract is not part of this case or the FAC and will be subject to review at some time in the future. Determinations about reporting are premature at best. It is possible existing reporting would address all needs for the Staff. I recommend the Commission wait until there is something to evaluate before taking any action on reporting requirements.

<u>Section 393.130.7, RSMo. Compliance</u>

Q: Have you reviewed the Rebuttal Testimony of Sarah Lange and her testimony concerning compliance with Section 393.130.7, RSMo.?

A: Yes, I have. In multiple statements within her Rebuttal Testimony, Ms. Lange references the Commission's obligation to ensure compliance with Section 393.130.7, RSMo. and in most cases the comments are associated with the Company's CCOS study.

Q: Do you agree that the Company CCOS offered in this case is not useful for determining compliance with the Section?

A: Yes. However, my opinion is not reflective of some deficiency in the CCOS approach, but instead that the CCOS data does not include the full costs and revenues associated with a large load customer to properly inform the Commission. The absence of a large load customer was known at the time of the Company's filing and has been fully discussed in our related testimony and case support. At this time, the Commission should rely on its work in EO-2025-0154, the Large Load Rate Plan docket to support evaluation of Section 393.130.7 RSMo. compliance.

Q: Will the Company CCOS be useful for determining compliance with the Section in the future?

A: Yes. The Company CCOS study and any alternate studies presented in a future rate case that is inclusive of a large load customer, will be a critical tool in maintaining compliance with Section 393.130.7, RSMo. I will offer additional testimony concerning the Company CCOS later in this testimony. Ms. Lange's concerns with Section 393.130.7, RSMo. compliance are premature.

Minimum Billing

Q: Ms. Lange repeats her concerns about the Company's minimum billing under LLPS. Do you have any additional testimony concerning this topic?

A: Yes. Due to the inefficient nature of the filing dates for non-Company Direct and Rebuttal Testimony, Ms. Lange does not have the benefit of my Rebuttal Testimony before preparing her Rebuttal Testimony. My Rebuttal Testimony addresses the Company's execution of the minimum billing, and I am confident that we are following our intended process. Reflecting on the issues raised in File No. EO-2025-0154 and the proposal of the LLPS Rate Plan, I am reminded that the Company and Staff spent considerable time litigating competing proposals instead of discussing how the various elements of the Company Schedule LLPS rate would operate. To further explain this issue, I offer the following waterfall diagram, Figure 1, to better highlight the minimum billing and the role of the Contract Minimum Balance.

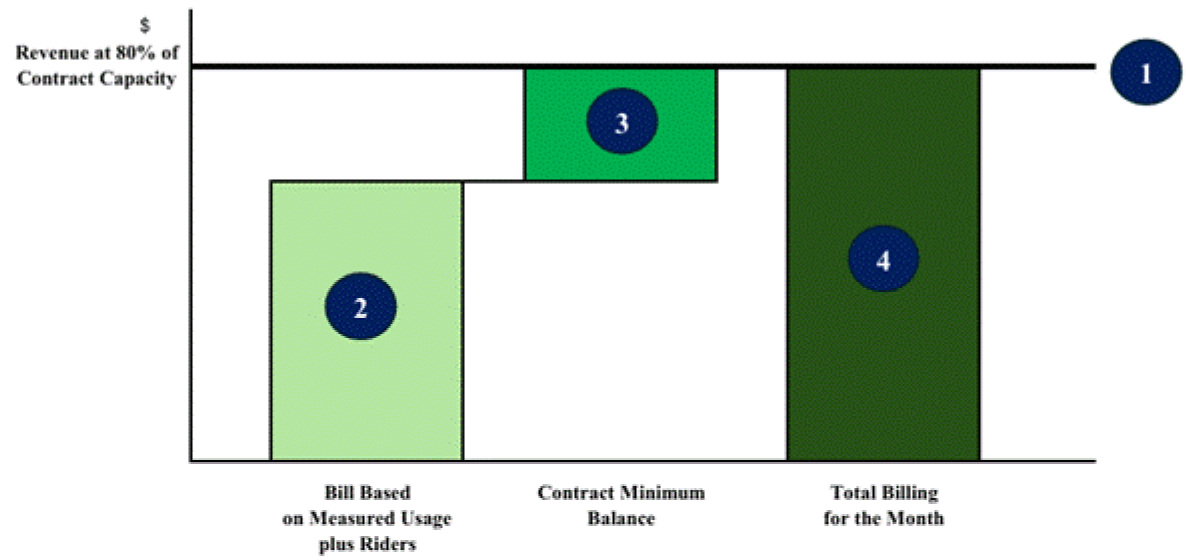

Figure 1

With step 1, the Company calculates the minimum bill amount by computing the sum of the Demand Charge, Customer Charge, Grid Charge, Reactive Demand Adjustment, any other Demand-Based Riders and, the Cost Stabilization Rider by using the Customer's Minimum Demand, set at 80% of the Contract Capacity for the period. Then, with step 2, the LLPS Customer billing is calculated based on the measured usage for the period. This calculation will be based on the Schedule LLPS pricing and will include all applicable riders. This is an important step as it ensures that actual consumption and related recovery through the rate elements and riders are correct. If the calculated bill is less than the minimum bill amount threshold calculated in step 1, then an amount, identified on the customer bill as the Contract Minimum Balance, step 3, is added to the bill to achieve a total bill amount, step 4, that is equal to the established minimum amount. The Contract

Minimum Balance is a bill display function, not a misapplication of the intended minimum bill.

Q: Ms. Lange introduces a Commission publication, "Utility Tariffs for Large Load Customers in Missouri", attached as Schedule SLKL-r1 to her testimony, and relies on its language to assess the Company's application of the minimum bill. What do you believe is the purpose of this document?

A: The document is a PDF version of a web page on the Commission website.[6] I accessed the page by clicking on a banner found on the MPSC home page. In my opinion, this is an informational summary provided to the general public to help them understand how the Commission has responded to Senate Bill 4 mandate and offer access to the Large Load tariffs of the Missouri utilities.

Q: Does the description of the minimum bill on the informational summary differ from the minimum bill language used in the Schedule LLPS tariff?

A: Yes, it does.

Q: Do you believe the informational summary was intended to replace the Schedule LLPS tariff in defining the application of the LLPS rate?

A: No, I don't. I believe this is a consumer-friendly presentation of the Large Load tariff features, meant to simplify a complex filing and guide those consumers to more detailed documents if they are interested. I noticed that the links to the utility Large Load tariffs on the web page and the PDF point to what appears to be a set of compliance tariffs filed in

[6] https://psc.mo.gov/General/Utility_Tariffs_for_Large_Load_Customers

our case and stored in a Community Outreach folder on the MPSC site[7] and not the currently active tariffs found in EFIS.[8]

Q: In your opinion, is the Company executing the minimum bill provisions of the Schedule LLPS tariff as intended?

A: Yes. This approach is intentionally different than the minimum billing used for other non-residential billing so that prospective customers may have a more reliable way to estimate the minimum bill amount, a critical value in understanding numerous other protections included in the Schedule LLPS rate design.

4. BILL ESTIMATION & BILL ACCURACY

Q: Please describe your testimony concerning Bill Estimation & Bill Accuracy?

A: My testimony is intended to respond to Rebuttal Testimony offered by Randall Jennings concerning the estimated impact of the Company's ±33 kWh error threshold and the treatment of estimations related to the time rate periods.

Q: How would you summarize the Rebuttal Testimony offered by Mr. Jennings on the Bill Estimation topic?

A: Mr. Jennings admittedly uses worst-case examples of impacts to portray Company usage estimations.[9] By only providing this view, Mr. Jennings does not help the Commission understand the true impacts and intentionally or inadvertently portrays usage estimations as a material threat to accurate customer billing and proper ratemaking.

Q: How should the Commission view an estimated bill or estimated intervals of a bill?

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[7] https://psc.mo.gov/CMSInternetData/Community%20Outreach/Evergy%20Large%20Load%20Tariff.pdf

[8] https://www.efis.psc.mo.gov/

[9] ER-2026-0143, Rebuttal Testimony of Randall Jennings, page 5, line 2

A: Estimated usage for billing represents a reasonable and informed substitution of a value in place of a measured value. Since the substitution is based on historic usage values from a similar period, it serves as an acceptable approach to billing. Estimated bills have been used for decades to allow timely billing and overcome short-term operational issues. Billing determinants and revenues inclusive of estimated usage have long been used to support just and reasonable ratemaking. Under the Staff's presentation. one might be led to believe that an estimated interval is representative of an error. This is not true. As noted in my Rebuttal Testimony, if an actual interval reading cannot be obtained from the metering system, the Company process will base its estimate on an interval reading from the same day/time one week prior, the same day/time two weeks prior, or a similar days/times. After the billing is completed using estimated data, the Company systems will continue to try and obtain an actual reading from the meter. Should actual reads be obtained, Company Billing personnel will examine the bill to determine if any corrected billing is needed. In her Rebuttal Testimony, Julie Dragoo testified that more than 99.5% of Company bills do not require correction.[10] The expectation with this process is that the estimated reading will approximate the reading that would have been obtained through an actual reading. Mr. Jennings' testimony does not adequately convey this aspect of the process.

Q: Concerning to the revenue impact calculation performed by Mr. Jennings, do you have any specific reaction to the estimates or calculation?

A: Similarly, Mr. Jennings portrays the worst-case example and does not offer an adequate representation that the billing is more than likely close to what the actual billing would

[10] ER-2026-0143, Rebuttal Testimony of Julie Dragoo, page 9, line 13.

have been. Ms. Dragoo offers other statistics concerning the Company billing performance.[11] Given that the Company produces over 99% of its customer bills without estimation or correction, it is impossible for the revenue impacts offered by Mr. Jennings to occur.

Q: Mr. Jennings states that since information about the reasons for the estimated bill and all efforts made to secure an actual reading is not available, Staff questions the accuracy of billing determinants provided by EMM in this case. Is this a fair concern?

A: No. The Company acknowledges that when meter reading was a manual process, there were a multitude of reasons why a meter read could not be obtained. For example, a mean dog, locked gate, or mechanical failure of the meter could be a reason. Today, under the Company's Advanced Metering Infrastructure ("AMI") system, there is only one reason identified for why a meter read cannot be obtained- no communication with the meter. Concerning the efforts to secure an actual reading, there again is only one effort identified- to attempt the meter read again. In our system, the meter will continue to try and send previously unsent measurements indefinitely. Depending on the age of the measurements when received, read correction notifications will be flagged for review to assess bill impact and make corrections if necessary. If there is a need to understand the reasons for an estimated bill and all efforts made to secure an actual reading for a specific estimated customer bill, the Company retains accurate records within its collective operational system to provide that understanding. The Company does not maintain a centralized listing of all estimations and the corresponding reason. However, the Company knows when a

[11] Id, Dragoo Rebuttal, page 10, line 14.

bill is estimated and can explain when asked by a customer why the estimation occurred. In this way, the Company maintains accurate records regarding estimated bills through its operational systems rather than through a standalone tracking database or report. Regardless, knowing the reason for an estimated interval or the efforts to secure an actual reading will not provide any information to affirm the accuracy of the billing determinants that is determined by the estimation process itself.

Q: Mr. Jennings asserts that due to estimations the Company billing within the rate time periods cannot be confirmed. How do you respond to this testimony?

A: Again, Mr. Jennings ignores the process in making his assertion. As noted previously, if an actual interval reading cannot be obtained from the metering system, the Company process will base its estimate on an interval reading from the same day/time one week prior, the same day/time two weeks prior, or a similar days/times. The estimation process inherently maintains alignment with the time periods of the rates. Only when a variance between total scalar reading and the sum of interval readings is more or less than the 33 kWh sum check threshold will that variance be applied across all intervals within the current billing period to ensure the interval totals reconcile to the scalar total.

Q: How can the Company be certain about the quality of these estimates?

A: Beyond the Rebuttal Testimony Ms. Dragoo offered details about our billing performance, the Company has developed an additional query of its sum check process to help the Commission understand the typical size of variances that are being processed.[12] The

[12] The Company acknowledges that this information was not available to respond to Staff discovery on bill estimation. It is not our practice to produce reports concerning work that is not performed. Given the ongoing debate concerning estimation practices, additional effort was made to create this query to clarify the Company operational situation and inform the Commission.

following table, Table 2, identifies the distribution of sum check variances for the twelve months ending June 2026.

Table 2

MISSOURI METRO SUM CHECK VARIANCE - MONTHLY DISTRIBUTION - % OF MONTHLY TRANSACTIONS										
	VARIANCE (KwH)									Variance Count
Month	0	>0 to <0.1	0.1 to <0.5	0.5 to <1	1 to <5	5 to <10	10 to <20	20 to <30	30 to <33	
Jul 2025	17.383%	68.658%	6.778%	3.761%	3.197%	0.142%	0.080%	0.000%	0.000%	286,287
Aug 2025	14.854%	70.915%	8.248%	3.641%	2.106%	0.133%	0.103%	0.000%	0.000%	275,695
Sep 2025	23.548%	69.817%	4.431%	1.358%	0.658%	0.105%	0.083%	0.000%	0.000%	275,609
Oct 2025	24.389%	70.859%	3.429%	0.760%	0.360%	0.104%	0.098%	0.000%	0.000%	312,345
Nov 2025	27.888%	67.769%	3.004%	0.602%	0.491%	0.144%	0.102%	0.000%	0.000%	213,382
Dec 2025	22.572%	70.564%	5.155%	0.760%	0.629%	0.192%	0.127%	0.000%	0.000%	286,599
Jan 2026	22.099%	70.688%	5.538%	0.856%	0.567%	0.139%	0.113%	0.000%	0.000%	275,637
Feb 2026	28.504%	68.269%	2.353%	0.291%	0.354%	0.141%	0.088%	0.000%	0.000%	257,256
Mar 2026	21.949%	70.443%	5.562%	1.101%	0.633%	0.173%	0.138%	0.000%	0.000%	284,356
Apr 2026	24.749%	70.016%	3.682%	0.759%	0.510%	0.168%	0.116%	0.000%	0.000%	289,193
May 2026	20.998%	71.064%	5.475%	1.437%	0.871%	0.088%	0.062%	0.005%	0.001%	264,549
Jun 2026	12.708%	70.595%	8.100%	4.477%	3.787%	0.188%	0.104%	0.037%	0.004%	289,751

As noted, in previous testimony and data request responses, the Company manually reviews sum check exceptions greater than ±33 kWh. For the sum-check transactions that did not produce an exception, 98.55% of the variances were for less than 1 kWh. The distribution shown in Table 2 provides a more representative view of actual operational performance than the hypothetical worst-case examples discussed by Mr. Jennings.

Q: Why is this ±33 kWh threshold important?

A: The Company is mindful of cost control, and it is not prudent for the Company to incur labor costs greater than the value of scalar/interval variance. Within the period examined in Table 2, the Company manually reviewed 5,734 sum checks[13] but avoided processing the 3,310,659 sum checks listed here thanks to the ±33 kWh threshold. Given the average cost to perform a sum check is approximately $4.54,[14] the Company would have spent $15,030,391 of additional labor cost that was instead used for other customer services had

[13] Response to Staff Data Request #0219.3 - "From Oct 2024 through June 15, 2026 we had 15,365 in Missouri Metro." To align the data presented, 5,734 sum checks of the total 15,365 were performed for the twelve months ending June 2026.
[14] id

we processed all sum check variances. The ±33 kWh threshold was useful in limiting these costs and did not expose customer billing to any unreasonable bill estimations.

Q: Once the estimated bill is issued and the processes to obtain an actual reading are complete, is the resulting bill a valid bill?

A: Yes. A bill that includes estimated usage will become the valid bill for that customer in that billing period and will be the official representation of the consumption and revenues. The meter reading and billing processes move forward to the next billing period.

Q: Staff recommends the Commission order the Company to maintain records of missing intervals, inserted estimated usage, the data supporting each estimate, and the circumstances requiring estimation; and to identify bills containing estimated usage and report to the Commission and Staff the level of usage and revenue being estimated. Do you support these recommendations?

A: No. These recommendations go well beyond the requirements of the 20 CSR 4240-13.020. The only record retention requirement of the regulation is concerning records of the reasons for the estimated bill and all efforts made to secure an actual reading. To require these additional details about estimated usage are impractical and unproductive. Maintaining these details are not without cost, and Staff does not consider this factor in their recommendation. It is unclear what these additional requirements will achieve if implemented. These additional records would not lead to fewer estimations or inform more accurate estimates. A rational examination of the Company's billing processes and actual customer outcomes produced by Evergy's billing systems identified by Ms. Dragoo in her

Rebuttal Testimony[15] supports that there is no clear need for these additional records to be retained and reported.

Q: Are there any other aspects of Mr. Jennings Rebuttal Testimony that you wish to address?

A: Yes. In comparing the recommendations offered by Mr. Jennings in his Direct Testimony and his Rebuttal Testimony, he has added provisions to the recommendation that the Company file a tariff revision to address interval estimation. Specifically, he adds that the tariff should include procedures that avoid alteration of actual interval reads in determining customer bills and provide thresholds for automated and manual estimation, thresholds for identifying customer bills that include estimated intervals, and potential bill revision processes. In Rebuttal Testimony, I expressed my support for a tariff revision to address interval estimation and included Exhibit BDL-1 to represent the Company's preferred language. The proposed language in Exhibit BDL-1 preserves a level of Company discretion as to the thresholds used to determine an estimated bill and is similarly aligned with the rules of other Missouri electric utilities who have terms for interval bill estimations. Including threshold details as recommended will not improve the estimation process and will only constrict the Company in controlling costs.

5. CLASS COST OF SERVICE

Q: Please describe your testimony concerning Class Cost of Service ("CCOS")?

A: My testimony is intended to respond to Rebuttal Testimony offered by Sarah Lange, and complement Surrebuttal Testimony offered by Graham Jaynes

Q: What is Ms. Lange's Rebuttal Testimony concerning CCOS?

[15] ER-20206-0143, Rebuttal Testimony of Julie Dragoo, page 10, line 14

A: Ms. Lange offers considerable Rebuttal Testimony exploring Staff's concerns about the CCOS study offered by the Company. The testimony begins with overall concerns and then examines allocations of production and energy-related cost, allocation of transmission cost, treatment of distribution costs, and concludes with administrative and other costs. Company witness Graham Jaynes addresses these CCOS-specific topics in his Rebuttal and Surrebuttal Testimony. Other Rebuttal Testimony related to CCOS offered by Ms. Lange is found in her section exploring LLPS in the Company CCOS. There she examines the steps taken by the Company and concludes,

> **Q. Is Staff's criticism that EMM did not know in February what a customer's demands and usage would be in March, April, May and June?**
> A. No. Staff's criticism is that it is counter productive that EMM conducted a CCOS that was distorted by partial incorporation of partial information related to LLPS activity. And Staff is obligated to inform the Commission that the EMM CCOS study does not include LLPS activity that is on an appropriate scale to be reasonably representative of the actual LLPS activity that is known through the ESA with Customer A, nor does the EMM CCOS include allocations of cost of service that are representative either of the LLPS activity assumed in the CCOS, nor Customer A.[16]

Q: How do you respond to this criticism?

A: The Company has been clear with its intentions for recognizing large load in this case. Considerable testimony and work paper support has been offered to detail the transitional nature of this case and preliminary steps takes to recognize elements of large load given that a large load customer did not exist in the test year for the case. We have disclosed and acknowledge that as large load customers receive service, it will be critical to represent the revenues, costs, and billing determinants in the study and its allocations. Specifically, we focused on presenting the revenue sharing element of the LLPS rate premium into the

[16] ER-2026-0154, Lange Rebuttal page 9, line 4

CCOS so that Parties could see the operation of that mechanism. Company witness Graham Jaynes speaks to the rate premium in his Direct and Rebuttal Testimony.

Q: Why are these transitional views important?

A: We expect the introduction of large load into the CCOS study will result in considerable change to traditional approaches and mechanics. By starting now with fewer but important refinements to the model, we hope to better prepare the Commission and interested parties for future cases where large load costs and revenues are more fully included.

Q: With respect to the current rate case and the Company rate design proposals, are the CCOS and its results beneficial?

A: Yes. The Company has proposed considerable rate design change in this rate case as we continue our efforts to achieve jurisdictional alignment. To properly support these proposals, we have offered two different CCOS studies to represent the movement of customer between the cases and provide the Parties a reasonable way to evaluate the rate design proposals. The CCOS studies also offer an important data point to inform the Parties about revenue increase allocation.

Q: How should the Commission react to Staff's concerns?

A: I urge the Commission to not accept the absolute perspective of Staff concerning CCOS and suggest the Commission fully consider the information offered by the CCOS studies. Disagreements about inputs and allocations are expected and should be viewed as a healthy aspect of the ratemaking process. I believe the Commission benefits from more cost-of-service information as opposed to less. As mentioned previously in the context of large load issues CCOS studies will be a critical tool in maintaining compliance with Section 393.130.7, RSMo. As large load customers are brought online and incorporated in the ratemaking process, CCOS results will inform rate design and revenue requirement allocation to reasonably ensure large load rates reflect their representative share of the costs incurred to serve and prevent other rates from reflecting any unjust or unreasonable costs arising from service to large loads.

6. REACTIVE DEMAND CHARGES

Q: Please describe your testimony concerning reactive demand charges.

A: Staff witness Sarah Lange offers a brief discussion concerning the reactive demand charges in the Rebuttal Testimony. The brief testimony states the Company did not offer justification for removing the reactive demand charges from the rates for non-LLPS classes and describes Staff's recent recommendations concerning reactive demand requirements. I will address both.

Q: Did the Company provide justification for the removal of demand charges in this case?

A: Yes. My Direct Testimony offers approximately two pages of testimony describing the Company's proposal concerning this charge.[17] Further, in Direct Testimony, I reference the 2024 EMW rate case, File No. ER-2024-0189, where I also addressed this topic, and under my analysis, determined the approach used at EMW to recover reactive demand costs was reasonable.[18] To clarify, the Company proposes to retain the reactive demand charge for its LPS and LLPS rate schedules, removing it from all other non-residential, non-lighting classes, aligning the EMM approach with the rate structures of EMW.

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[17] ER-2026-0154, Lutz Direct, page 11, line 13 through page 13, line 9
[18] ER-2024-0189, Direct Testimony of Brad Lutz, page 28, line 1 through page 34, line 5

Q: To be clear, what is the Company's justification for its reactive demand recommendation?

A: Reactive demand is a necessary element of power supply that is used to sustain the electromagnetic field in the grid. Evergy addresses reactive demand at three primary levels, the transmission grid, the distribution grid, and the customer level as part of general power quality efforts. All customers affect reactive demand, but large customers disproportionately due to large motors, pumps, and equipment commonly used by their operations. Although all customers contribute to reactive demand, most do so in small ways they could not directly control separate from other energy usage. The Company believes that for most customer classes, a specific charge is not useful or necessary. Similar to the treatment in EMW, the reactive demand charge should only apply to the LPS and LLPS rate schedules.

Q: Concerning Staff's perceived, "increasing needs for investments to address reactive demand requirements due to changes in the regional generation fleet," do you believe this is a compelling reason to maintain the reactive demand charge on C&I rates?

A: No. I do not agree there is an increasing need to address reactive demand. The retirements of traditional rotating mass generation and increases in inverter-based generation within Missouri observed in ER-2022-0337 are not occurring now.

Q: Do you continue to recommend that the reactive demand charge be applicable only to LPS and LLPS rate schedules?

A: I do.

7. CRITICAL PEAK RATE

Q: Please describe your testimony concerning the Critical Peak Rate?

A: I will respond to Staff's additional recommendation concerning a flat charge for residential customers who have opted out of the Company AMI metering.

Q: Does this additional recommendation change your view of the Critical Peak Rate and the recommendations made in your Rebuttal Testimony?

A: No. I continue to recommend that the Commission reject the Critical Peak Rate and consider other ways to generate revenues to offset high-cost events that may occur and flow through the Company FAC charge. Something akin to a storm reserve seems more practical in my mind. In my opinion, this need for an additional recommendation to clarify this design oversight further highlights the complexity of administering the Critical Peak Rate to drive revenues to the FAC.

8. INCOME ELIGIBLE SOLAR SUBSCRIPTION

Q: What is the purpose of your testimony?

A: I respond to the Rebuttal testimony of Renew Missouri witness Philip A. Fracica regarding income-eligible community solar. I will also explain why the Company should continue its existing Income-Eligible Solar Subscription Pilot before determining whether or how the offering should be modified or made permanent.

Q: Please summarize the Company's current Low-Income Solar Subscription Pilot Rider Program.

A: In January of 2023, as part of ER-2022-0129, the Company received approval to implement the Low-Income Solar Subscription Pilot Rider ("LIS Program"). The LIS Program is offered to provide a limited number of low-income residential customers the opportunity to voluntarily subscribe to the generation output of a solar resource and receive electricity from solar resources. As part of the LIS Program, it is the Company's goal that no subscribing residential customer pay more than the average retail rate for power.

Q: What has been the level of participation in the LIS Program?

A: Participation through 2025 has been steady with about 30 customers participating, subscribing to about 22% of the solar resource available to the LIS Program. Customer adoption has been weaker than expected.

Q: Did the LIS program include a plan for addressing the end of the pilot?

A: Not specifically. The Company identified details around a program evaluation as part of the Solar Subscription Rider, Schedule SSP, a program related to the LIS Program. Under Schedule SSP, this evaluation will occur prior to any request for expansion or after five years of operation, whichever is first. Within the LIS Program tariff, there is a reference to an evaluation, and I would have the same expectation concerning timing for that evaluation.

Q: Has the Company requested expansion of the LIS Program or has the LIS Program been in operation for five years?

A: No.

Q: Have you reviewed the recommendation made by Mr. Francia for an Income-Eligible Community Solar Program?

A: Yes. Mr. Francia made the recommendation that the Commission direct Evergy to evaluate expansion of its existing Low-Income Solar Subscription Pilot into a permanent or expanded program, with the goal of presenting a proposed program design no later than its next rate case.

Q: Should the current pilot be converted to a permanent or expanded program now?

A: Not at this time. The existing Income-Eligible Solar Subscription Pilot provides the appropriate vehicle to develop evidence concerning enrollment, participation, customer experience, bill impacts, administration, outreach, coordination with other assistance programs, and overall cost-effectiveness. A decision to modify, expand, or make the offering permanent should be informed by the pilot's actual results and lessons learned rather than predetermined in this case. It is notable that Mr. Francia identifies the importance and uncertain availability of available federal, state, utility, and other funding mechanisms that could increase the economic benefit provided to income-eligible participants for a Low-Income or Income-Eligible Solar Program. Beyond program evaluation factors, these funding options could be a critical driver of the next viable steps for this form of service.

Q: What does the Company recommend?

A: The Company should continue operating its existing Income-Eligible Solar Subscription Pilot under its approved terms, completing the evaluations as expected.

9. BATTERY STORAGE TARIFF

Q: What is the purpose of your testimony?

A: I respond to Commission Staff witness Shawn E. Lange regarding potential customer battery programs proposed in the rate design direct testimony of Renew Missouri witness Philip A. Fracica. My testimony will respond to Staff's concerns and recommendations.

Q: Please remind the Commission of your Rebuttal Testimony concerning the recommendations of Mr. Fracica?

A: The Company recommends the Commission reject the proposals for the three new pilots and instead allow the Company's direction is to develop a scaled permanent BESS program that can deliver system peak value, improve customer and grid resilience, integrate other behind the-meter resources, and improve cost-effectiveness relative to the utility-owned pilot model. The Company commits to: (1) use the final RBES pilot evaluation as primary design evidence; (2) evaluate scalable pathways beyond the RBES pilot; (3) solicit stakeholder feedback, (4) bring forward a program design through the appropriate regulatory process.

Q: **What is Staff's position concerning Mr. Fracica's proposal?**

A: Mr. Lange agrees there could be limited benefits from the proposed pilots but offered two major concerns about the proposal. First, only a subset of EMM's customers would be eligible under these proposed programs[19] and second, is the cost.[20] Staff does not express it directly, but I interpret the testimony to indicate Staff does not support Mr. Fracica's recommendation.

Q: **Does Staff oppose the creation of a battery program?**

A: No. However, Mr. Lange recommends the Commission order EMM to propose a customer battery pilot program in its next general rate case subject to a number of terms.

Q: What is the Company's recommendation?

A: The Commission should not direct EMM in this case to file a particular customer battery program or prescribe detailed design requirements. EMM should be allowed to continue evaluating program options. If the Company later proposes a program, the stakeholder feedback will guide the design and the applicable regulatory proceeding will provide the

[19] ER-2026-0143 Rebuttal Testimony of Shawn Lange, page 3, line 7
[20] id, line 13

appropriate forum to evaluate its design, benefits, costs, protections, reporting, duration, and allocation of cost responsibility on a complete record.

10. BOOK #3 – RULES AND REGULATIONS

Q: What is the purpose of your testimony?

A: I will respond to the Rebuttal Testimonies of Randall Jennings and Tammy Huber concerning their review of changes to the Company Rules and Regulations, proposed as Book #3 in this case.

Q: Both Mr. Jennings and Ms. Huber state that the Company proposed tariff changes that it did not address in Direct Testimony. Is this true?

A: Yes. The approach was intentional and discussed in my Direct Testimony. Prior to filing, the Company previewed its proposed Rule and Regulations changes with Staff and discussed the Book #3 filing with the Commission Data Center in an effort to streamline and appropriately support this comprehensive change. Both Staff and the Data Center were helpful in offering guidance on the steps to complete this change.

Turning to the filing of the proposed changes, there are a number of instances where material revisions are proposed and explored in detail within my Direct Testimony. There are many lesser revisions and formatting changes that are also being proposed that were not identified in testimony. To navigate these numerous changes, Staff recommended that the Company prepare workpapers that would identify the Book #3 proposed placement relative to the current Book #2 placement. This workpaper was created and provided to Staff at the time of the Direct filing.

Following the Direct Filing of this case, the Company provided monthly "error logs" to Staff to document miscellaneous errors and recommended corrections identified after the filing. A copy of the August log is included as Schedule RJ-r3 to the Rebuttal Testimony of Randall Jennings.

Most recently, on August 5th, just prior to the filing of Rebuttal Testimony, the Company held a conference call with Staff to review the error log and to address questions about the proposed Rules. Most of the issues discussed in the conference call were contained in the August 11 Rebuttal Testimony of Mr. Jennings and Ms. Huber.

Q: Why didn't Mr. Jennings and Ms. Huber acknowledge these preparations, shared plans, and collaborations in their testimony?

A: I do not know. I do note that both mentioned the error log that has been used as a repository for changes as they have been identified. I appreciate Staff's support of the error log process as I expect it should help streamline compliance tariff preparation and review.

Q: Concerning the specific issues identified in the Rebuttal Testimony of Mr. Jennings and Ms. Huber, are these accurate?

A: Yes, but for two items of clarification concerning the delinquent date topic and temporary service topic.

Q: What was Staff's concern related to the delinquent date topic?

A: Staff noted that the proposed Rule change filed by the Company sets the residential delinquent date at fifteen (15) days and the non-residential date at twenty-one (21) days. This is contrary to Chapter 13 regulations that require utilities to allow monthly billed customers at least twenty-one (21) days to remit payments.[21]

Q: Did the Company address this concern?

[21] ER-2026-0154, Direct Testimony of Tammy Huber, page 8, starting on line 1

A: Yes, the Company informed Staff in the August 5th meeting that the dates were inadvertently switched, and the intended language should have read twenty-one (21) days for residential customers and fifteen (15) days for non-residential customers. An entry was made in the error log to identify this correction

Q: Did this response alleviate Staff's concerns?

A: No, Ms. Huber notes in her Rebuttal Testimony that Chapter 13 requires twenty-one (21) days for monthly billed customers to pay their billed charges.[22] She states she is unaware of the purpose behind the fifteen (15) day timing for non-residential customers, and she requested that both residential and non-residential customers to have twenty-one (21) days to remit payments. The Company proposes to maintain the fifteen (15) day timing proposed for non-residential customers

Q: Why is EMM proposing to maintain fifteen (15) days for non-residential customers to remit payment?

A: The Missouri Metro Rules and Regulations currently set the delinquent date for non-residential customers at fifteen (15) days and allows thirty (30) days for the State of Missouri and its Agencies.[23] The Company recommends retaining this timing, including the allowance for the State, as part of the new Book #3. The fifteen (15) day timing applicable to non-residential customers has been in place at Missouri Metro since April 30, 1981,[24] and several Company processes are in place based on these dates.

Q: What was Staff's concern related to the temporary service topic?

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[22] ER-2026-0143, Rebuttal Testimony of Tammy Huber, page 8, line 26
[23] Evergy Missouri Metro General Rules and Regulations, Sheet 1.26, Section 8.02
[24] P.S.C. Mo. No. 2, Third Revised Sheet 1.26 Effective April 30, 1981

A: In part, Staff recommends that EMM specify that the "temporary service" will be charged at the "applicable permanent service."[25] The Company accepts the intent of this recommendation but believes it is incomplete.

Q: What language do you recommend?

A: The proposed tariff currently states,

> "Applications for temporary service will be reviewed by Company, as received, and considered as a special contract subject to the applicable rates, rules, regulations, terms, conditions, and orders of all governmental authorities having jurisdiction."

The Company proposes the sentence to state,

> "Applications for temporary service will be reviewed by Company, as received, and subject to the applicable rates for permanent service, rules, regulations, terms, conditions, and orders of all governmental authorities having jurisdiction."

Q: Looking ahead, if the Book #3 Rules are approved by the Commission, will there be changes needed for Evergy Missouri West in a future rate case?

A: Yes. If the revised Rules are approved in this case, we expect to propose adoption of nearly identical Rules in a future EMW rate case. If approved in that case, the Company will have taken another step in furtherance of consolidation of its Missouri jurisdictions.

Q: Does that conclude your testimony?

A: Yes, it does.

[25] ER-2026-0154, Direct Testimony of Randall Jennings, page 12, line 6

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 BRADLEY D. LUTZ

STATE OF MISSOURI)
) **ss**
COUNTY OF JACKSON)

Bradley D. Lutz, being first duly sworn on his oath, states:

1. My name is Bradley D. Lutz. I work in Kansas City, Missouri and I am employed by Evergy Metro, Inc. as Director – 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 thirty-two (32) 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.

Bradley D. Lutz

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