

Exhibit No.:

Issue(s):

Large Load Customers/Planning
Reserve Margin/ELCC/IRP/
Decisional Prudence

Witness/Type of Exhibit:

Seaver/Rebuttal

Sponsoring Party:

Public Counsel

Case No.:

EA-2026-0154

REBUTTAL TESTIMONY

OF

JORDAN SEAVER

Submitted on Behalf of the Office of the Public Counsel

**EVERGY METRO, INC. D/B/A
EVERGY MISSOURI METRO**

CASE NO. EA-2026-0154

**

**

Denotes Confidential Information that has been redacted

September 15, 2026

PUBLIC

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**REBUTTAL TESTIMONY
OF
JORDAN SEAVER
Evergy Metro, Inc. d/b/a Evergy Missouri Metro
CASE No. EA-2026-0154**

I. INTRODUCTION

Q. What is your name and what is your business address?

A. My name is Jordan Seaver, and my business address is 200 Madison Street, Governor Office Building, Suite 650, Jefferson City, MO 65102.

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

A. I am employed by the Office of Public Counsel (“OPC”) as a Policy Analyst.

Q. Have you previously testified before the Missouri Public Service Commission (“The Commission”)?

A. Yes, I have previously testified before the Missouri Public Service Commission. See Schedule JS-R-1 for my past pre-filed testimony and memoranda.

Q. What are your work and education backgrounds?

A. I have been employed as a Policy Analyst by OPC since January 2022. I have attended Michigan State University’s Institute of Public Utilities (“IPU”) Accounting and Ratemaking Course, as well as the National Association of Regulatory Utility Commissioners (“NARUC”) Rate School. I previously worked as a Legal Assistant for Cascino Vaughan Law Offices for 7 years. I have a Master of Arts in Philosophy from the University of Wyoming, and a Bachelor of Arts in Philosophy from the University of Illinois at Chicago.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of this testimony is to respond to the direct testimony of Evergy Missouri Metro (“EMM” or “The Company”) witnesses regarding the need for the Mullin Creek #2, the capacity position of the Company, and the request made for decisional prudence. The need for Mullin Creek #2 is the expected large load from data center customers in the Company’s service territory.

1 Company witnesses Kevin Gunn, Jason Humphrey, and Cody VandeVelde
2 assert in their direct testimonies that the large load customers that are
3 expected to come online are the cause of the request for a CCN for Mullin Creek
4 #2. The Company's capacity position change from the 2024 Integrated
5 Resource Plan ("IRP") to the 2026 IRP update filing is only explained by the
6 projection of large load customers coming online. The prospective capacity
7 additions went from no thermal generation being added in 2031 to adding 440
8 MW of simple cycle gas turbine ("SCGT") generation. In addition, the thermal
9 generation that had been planned in the 2030's in the 2024 IRP filing was all
10 increased and moved to earlier dates in the 2025 and 2026 IRP update filings.
11 And because of the capacity position change due to the expected large load
12 customers, which are the cause of the need for Mullin Creek #2, the Company's
13 request for decisional prudence in this case should not be granted.

14 **II. LARGE LOAD CUSTOMERS**

15 **Q. What reasons has Evergy Missouri Metro given for why it needs Mullin**
16 **Creek #2?**

17 A. Company witness Mr. Cody VandeVelde states in his direct testimony in this
18 case that the need for the plant is "driven in significant part by committed
19 large-load customers, including data center customers."¹ He also states that
20 "The total combined peak of the large-load customers included in the 2026 IRP
21 base load forecast is projected to be approximately 900 MW at steady state,
22 with nearly 90% of that load located in EMM's service territory."²

23 Company witness Mr. Jason Humphrey states that "building now supports
24 Governor Kehoe's economic development objectives and enables Evergy to
25 provide safe and adequate service to large-load customers"³ and that delaying

¹ Cody VandeVelde, Direct Testimony, Case No. EA-2026-0154, p 6.

² *Ibid.*

³ Jason Humphrey, Direct Testimony, Case No. EA-2026-0154, p 5.

1 the project “risks missing near-term in-service windows for announced large-
2 load customers.”⁴

3 **Q. Have Evergy Missouri Metro witnesses given other reasons?**

4 A. Yes. Mr. VandeVelde states that

5 “the Project is forecasted to reduce costs for Evergy Metro customers and
6 to meet their energy and capacity requirements over the twenty-year
7 planning horizon. When it is fully operational, Mullin Creek #2 will help
8 meet Evergy Metro’s near-term requirement for capacity starting in the
9 winter of 2030/31. This dispatchable thermal Project will be a critical
10 element in Evergy Metro’s plan to address its near-term capacity needs.
11 Evergy Metro must secure dependable, ‘steel-in-the-ground’ resources to
12 meet its capacity needs.”⁵

13 The way this is written suggests that the Company’s capacity need starting in
14 2030/2031 is a result of even growth in all customer classes. But, as the 2026
15 Evergy Missouri Metro IRP Annual Update makes clear, that capacity need
16 beginning in 2030 is caused by large load customer growth. This load growth
17 will be “beginning in 2026 and exceeding 300 MW by 2031.”⁶

18 The Evergy Metro 2025 Annual Update IRP report also stated with regard to
19 large load that “Evergy Metro and the new large load customer continue to
20 progress with negotiations and expect to have Construction and Service
21 Agreements fully executed in the second quarter of 2025.”⁷ Further, the report
22 says that “Evergy has a large pipeline of prospective new large load customers”
23 and that a “portion of the new large load was included in the typical load

⁴ *Ibid.*, p 12.

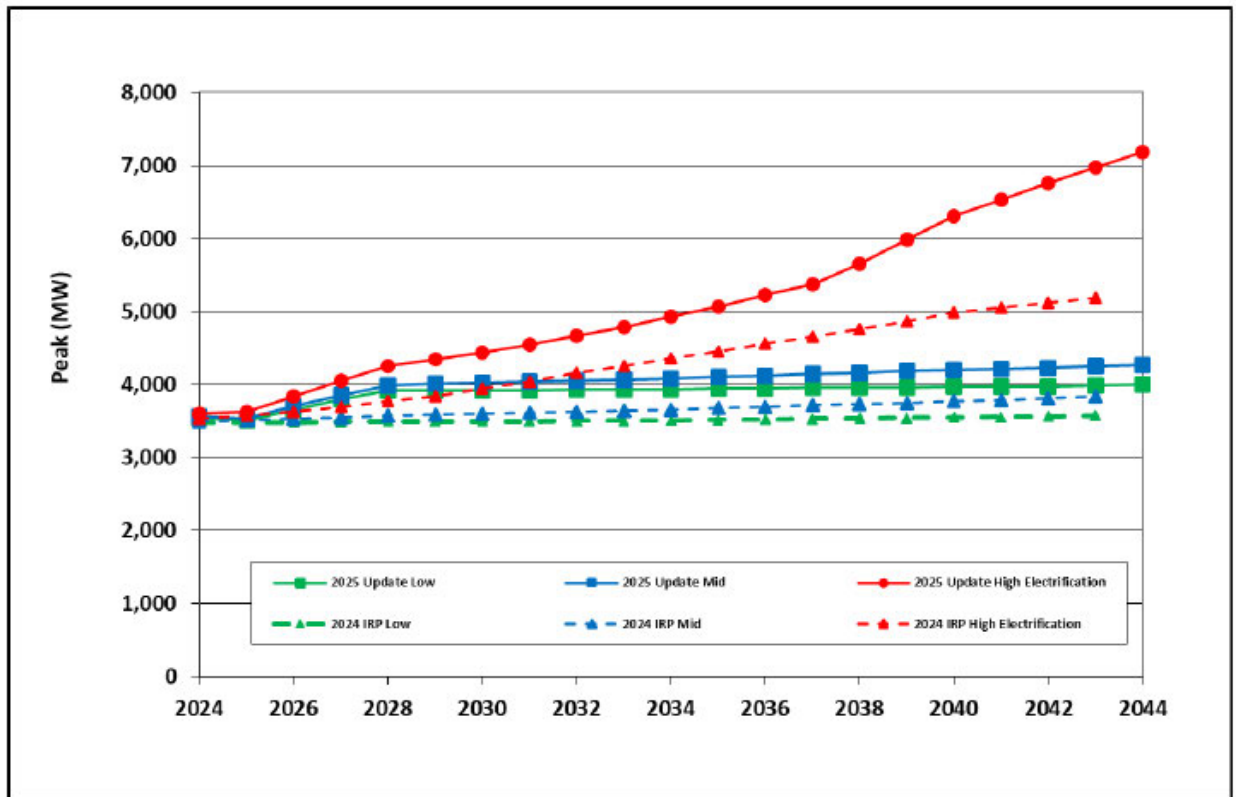
⁵ Cody VandeVelde, Direct Testimony, Case No. EA-2026-0154, pp 6-7.

⁶ Evergy Missouri Metro 2026 Annual Update Integrated Resource Plan, Case No. EO-2026-0188, p 3.

⁷ Evergy Metro 2025 Annual Update Integrated Resource Plan, Case No. EA-2025-0250, p 13.

forecast data shown in Table 4, Figure 4, and Figure 5.”⁸ Below, I have included Figure 4, which shows Evergy Missouri Metro’s peak capacity forecasts from 2024 to 2044:

Figure 4: Peak Forecasts – 2025 Annual Update vs. 2024 Triennial IRP



It can easily be seen from this graph that even the low and mid 2025 update forecasts for peak MW are higher than the high electrification forecast from the 2024 IRP. The large rate of increase for the 2025 forecast begins in 2026 and is significantly higher than previous forecasts by 2031, which is consistent with the Company’s statements regarding known large load customer ESAs and projected large load customer load growth.

⁸ *Ibid.*

1 **Q. What is your response to Mr. VandeVelde’s claim in his direct testimony**
2 **that the Southwest Power Pool (“SPP”) change to planning reserve**
3 **margin and effective load carrying capability (“ELCC”) is a major**
4 **reason for the Mullin Creek #2 project?**

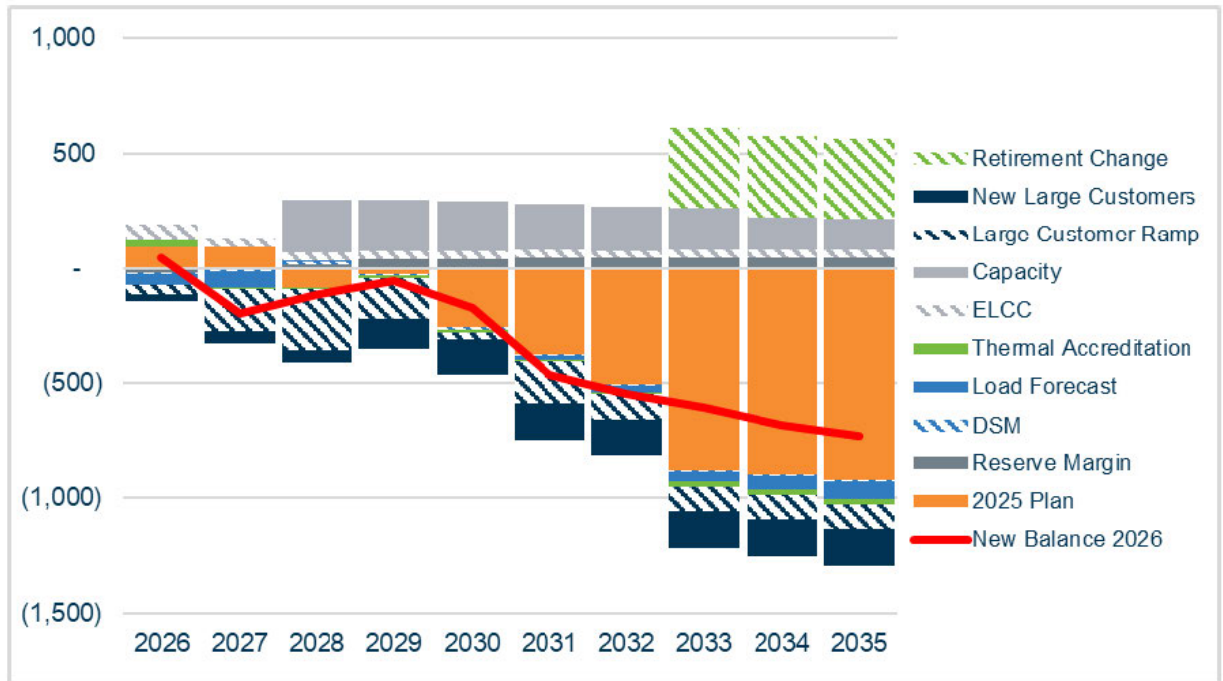
5 A. Mr. VandeVelde is correct that the SPP is implementing, beginning this year, a
6 change to its planning reserve margin for utilities, and that it is also
7 implementing ELCC methodologies that will affect the accredited capacity of
8 new renewable resource additions especially. But, in the Company’s 2026 IRP
9 Annual Update report, it specifies that

10 “ELCC calculations for existing renewable resources and PPAs show a
11 small increase in forecasted summer capacity accreditation. There is also
12 a small increase in the capacity balance attributable to slightly lower
13 reserve margin requirements than forecasted in the 2025 Annual
14 Update.”⁹

15 In addition to these explicit comments, the graph provided in that report titled
16 “Changes to Evergy Metro Summer Capacity Balance” shows that the ELCC
17 methodology changes at SPP only increase the reserve margin for existing
18 resources for summer capacity out to 2035. The Large Load Customer Ramp, on
19 the other hand, is shown as significantly reducing capacity from 2026 through
20 2035. I have included this graph from page 71 of the report below:

⁹ Evergy Missouri Metro 2026 Annual Update Integrated Resource Plan, Case No. EO-2026-0188, p 72.

Figure 23: Changes to Evergy Metro Summer Capacity Balance



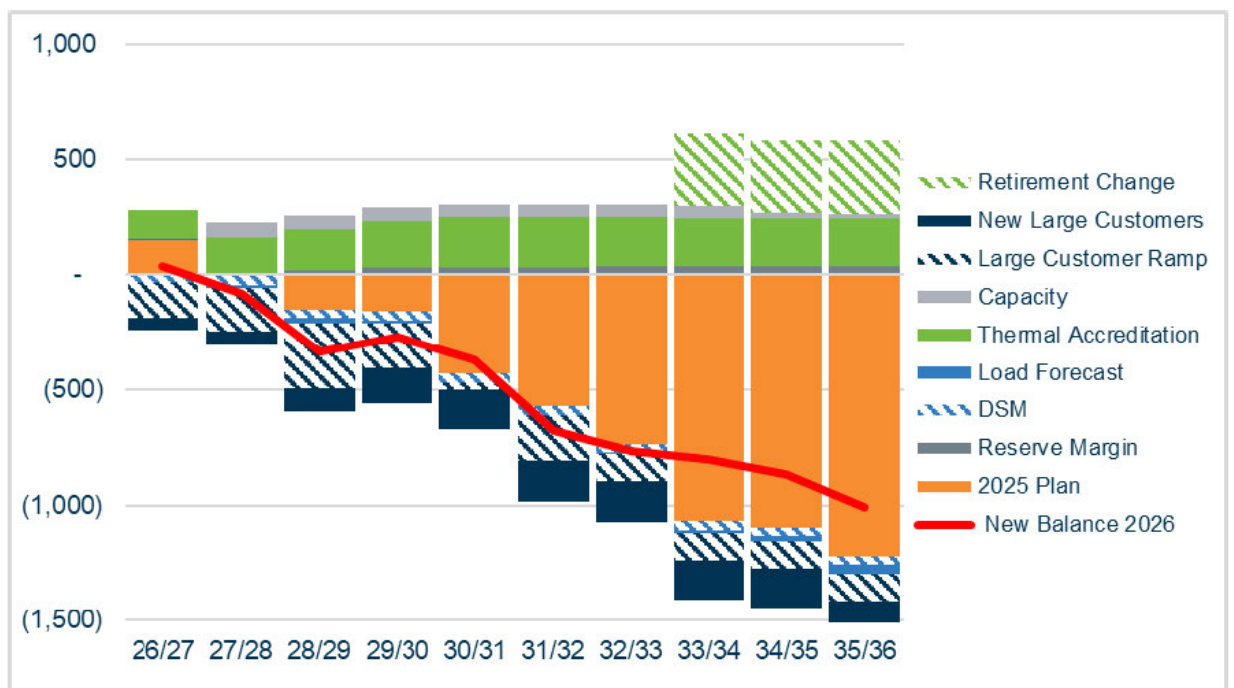
Regarding the winter capacity position of Evergy Missouri Metro, the report states

“Evergy Metro’s revised winter capacity balance reflects gains from increased accreditation from existing thermal resources – primarily due to firming of natural gas supply which is expected to reduce outage risk. Evergy Metro’s winter capacity position benefitted from the executed market-capacity purchases, however the contribution to winter capacity was lower than summer due to ties to solar resource accreditation. **Higher large load forecasts outweighed these capacity additions, leaving Evergy Metro shorter winter capacity in most years through winter 32/33.**”¹⁰

¹⁰ Evergy Missouri Metro 2026 Annual Update Integrated Resource Plan, Case No. EO-2026-0188, p 73, emphasis mine.

As shown above, the Company's winter capacity position was being supported by market purchases, but what is causing the projected deficits is the expected large load additions. The graph titled, "Changes to Evergy Metro Winter Capacity Balance," also shows that a significant reduction in capacity is the large load additions, not the ELCC or planning reserve margin changes (I have included this graph from page 72 of the report below). Again, this shows that the planning reserve margin ELCC changes at SPP are not the main cause of the capacity deficit for Evergy Missouri Metro. The addition of the expected large load is the cause of the deficit, which means that the Mullin Creek #2 plant is principally needed because of the expected large load customers.

Figure 24: Changes to Evergy Metro Winter Capacity Balance



Q. Is Mr. VandeVelde the only Evergy Missouri Metro witness who testifies about why Evergy Missouri Metro needs Mullin Creek #2?

A. No. Mr. Humphrey does also. He states in his direct testimony that

1 “Both the 2024 Triennial IRP and the subsequent 2025 and 2026 annual
2 IRP updates of the Company have included simple-cycle natural gas
3 generation. Specifically, EMM’s preferred plan identified 440 MW of
4 simple-cycle capacity in 2031. The CCN before the commission here is
5 intended to address that need with the addition of Mullin Creek #2”¹¹.

6 And further:

7 “The 2026 Preferred Plan represents an efficient and effective mix of
8 generation assets that the Company can utilize to meet the demands of
9 customers over multiple futures...This plan takes an ‘all-of-the-above’
10 approach to a resource mix which allows EMM to satisfy the resource
11 adequacy requirements of Southwest Power Pool, Inc. (‘SPP’) through a
12 diversified portfolio of supply-side and demand-side assets. Moreover, the
13 Mullin Creek #2 is an important near-term step in that long-term plan,
14 enhancing flexible, reliable, and dispatchable generation that
15 complements renewables and helps ensure EMM has steel-in-the-ground
16 capacity.”¹²

17 Not only do both of these quoted passages suggest that the need for the Mullin
18 Creek #2 plant is all customers’ needs, plus backup generation for intermittent
19 renewables, but the first quoted passage is misleading. The 2024 IRP Preferred
20 Plan had no thermal additions in 2031, and, with the exception of 415 MW
21 scheduled for 2032, had no consistent thermal additions until 2036, 2038, 2039,
22 and finally 2041. See the table below taken from the 2024 IRP Vol. 1 report:

¹¹ Jason Humphrey, Direct Testimony, Case No. EA-2026-0154, p 16.

¹² *Ibid.*, pp 17-18.

Table 3: Evergy Metro Preferred Plan

Year	Wind (MW)	Solar (MW)	Battery (MW)	Thermal (MW)	Capacity Only (Summer MW)	DSM (Summer MW)	Retirements (MW)
2024	0	0	0	0	0	65	0
2025	0	0	0	0	0	130	0
2026	0	0	0	0	126	181	0
2027	0	300	0	0	34	231	0
2028	0	150	0	0	26	272	0
2029	150	0	0	0	0	294	0
2030	150	0	0	0	0	326	0
2031	150	0	0	0	0	355	0
2032	0	0	0	415	0	375	0
2033	150	0	0	0	0	395	375
2034	150	0	0	0	0	417	0
2035	150	0	0	0	0	435	0
2036	0	0	0	325	10	451	0
2037	0	0	0	0	0	464	0
2038	0	0	0	325	0	476	0
2039	0	0	0	325	0	491	0
2040	0	150	0	0	34	508	832
2041	0	0	0	325	47	524	0
2042	150	0	0	0	0	539	0
2043	0	0	0	0	0	552	0

The 2025 IRP Annual Update Preferred Plan moved the 415 MW of thermal generation from 2032 to 2031 and added 25 MW, making it 440 MW. It also moved up the rest of the thermal additions and increased their capacity by 30 MW, making them 355 MW additions in 2032, 2033, 2037, 2039, and adding one to 2040. The table from the 2025 IRP Annual Update showing these is below¹³:

¹³ Taken from the Evergy Metro 2025 Annual Update Integrated Resource Plan, Case No. EA-2025-0250, p 4.

Table 3: Evergy Metro Preferred Plan Comparison

Note: All retirement dates were assumed to be end of year for 2024 Triennial, but end of winter season for 2025 Annual Update.

	2024 Triennial IRP	2025 IRP Annual Update
Retirements	LaCygne 1 in 2032 LaCygne 2 in 2039 latan 1 in 2039	LaCygne 1 in 2032 LaCygne 2 in 2039 latan 1 in 2039
Wind Additions	150 MW in 2029 150 MW in 2030 150 MW in 2031 150 MW in 2033 150 MW in 2034 150 MW in 2035 150 MW in 2042	150 MW in 2028 150 MW in 2029 150 MW in 2034 150 MW in 2035 150 MW in 2044
Solar Additions	300 MW in 2027 150 MW in 2028 150 MW in 2040	300 MW in 2027 150 MW in 2030 300 MW in 2036 300 MW in 2038 300 MW in 2041 300 MW in 2042 300 MW in 2043
Battery Additions	n/a	150 MW in 2030
Thermal Additions	415 MW CT in 2032 325 MW CC in 2036 325 MW CC in 2038 325 MW CC in 2039 325 MW CC in 2041	440 MW CT in 2031 355 MW CC in 2032 355 MW CC in 2033 355 MW CC in 2037 355 MW CC in 2039 355 MW CC in 2040
New DSM Programs	RAP+	MEEIA

Then, in the 2026 IRP Annual Update, the Company increased the thermal additions to include two more simple cycle gas turbines (“SCGT”) of 440 MW in 2035 and 2038. Additions of combined cycle gas turbines (“CCGT”) of 355 MW were still scheduled for 2032, 2040, and 2042. There is also an addition of 148 MW of reciprocating internal combustion engine generation in 2044. Below is the table showing the 2026 IRP Preferred Plan update¹⁴:

¹⁴ Taken from the Evergy Missouri Metro 2026 Annual Update Integrated Resource Plan, Case No. EA-2026-0188, p 6.

Table 3: Evergy Metro Preferred Plan Comparison

	2025 IRP Annual Update	2026 IRP Annual Update
Retirements	La Cygne 1 March 2033 La Cygne 2 March 2040 Iatan 1 March 2040	La Cygne 1 March 2038
Wind Additions	150 MW in 2028 150 MW in 2029 150 MW in 2034 150 MW in 2035 150 MW in 2044	
Solar Additions	300 MW in 2027 150 MW in 2030 300 MW in 2036 300 MW in 2038 300 MW in 2041 300 MW in 2042 300 MW in 2043	150 MW in 2028
Battery Additions	150 MW in 2030	150 MW in 2030
Thermal Additions	440 MW CT in 2031 355 MW CC in 2032 355 MW CC in 2033 355 MW CC in 2037 355 MW CC in 2039 355 MW CC in 2040	440 MW CT in 2031 355 MW CC in 2032 440 MW CT in 2035 440 MW CT in 2038 355 MW CC in 2040 355 MW CC in 2042 148 MW RICE in 2044
New DSM Programs	MEEIA Cycle 4 Extended Demand Response	Continuation of Demand Response

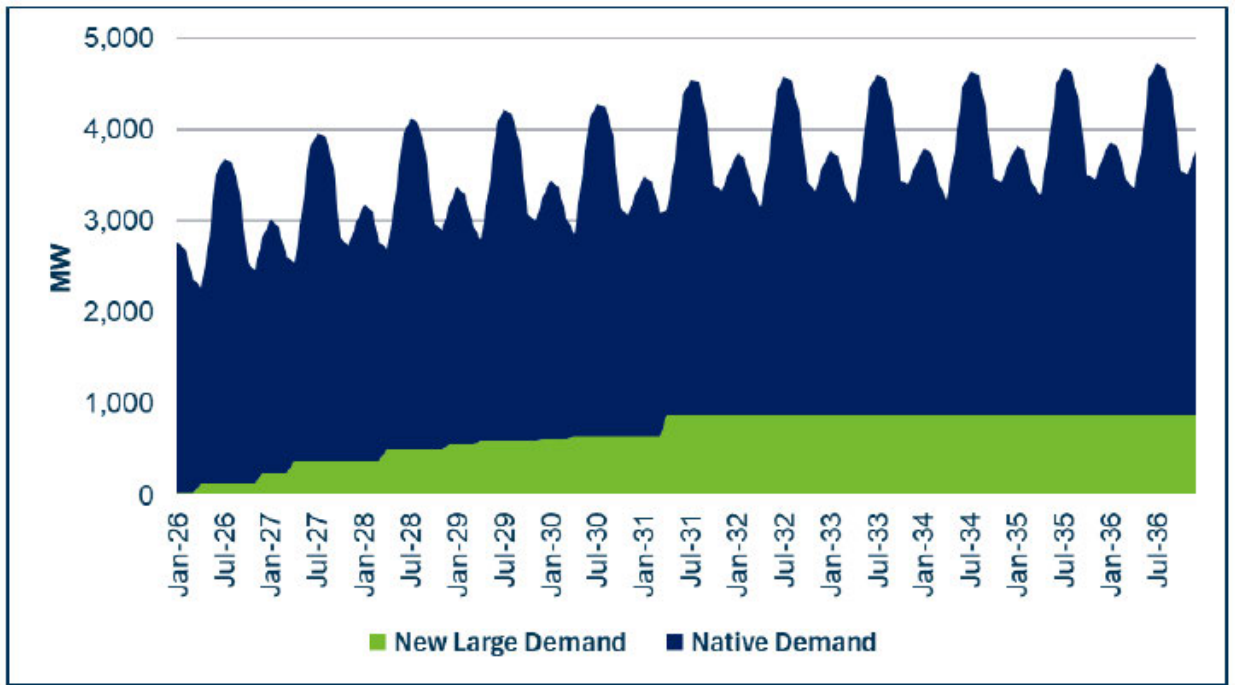
*CCGT = CC, SCGT = CT, Natural Gas = NG

So, the total change in scheduled thermal addition MWs from 2024 to 2026 is 818 MW.¹⁵ The difference between the scheduled thermal additions in the 2024 and 2026 IRPs by 2035 is 820 MW. Most of the change in the thermal additions comes from the years between 2030 and 2036. There is a large projected capacity and energy increase in that same period according to the Evergy Missouri Metro 2026 IRP Annual Update. I have included the graphs showing this below¹⁶:

¹⁵ This is the result of subtracting the total 1,715 MW of scheduled thermal generation in the 2024 IRP from the total 2,533 MW of scheduled thermal generation in the 2026 IRP Annual Update.

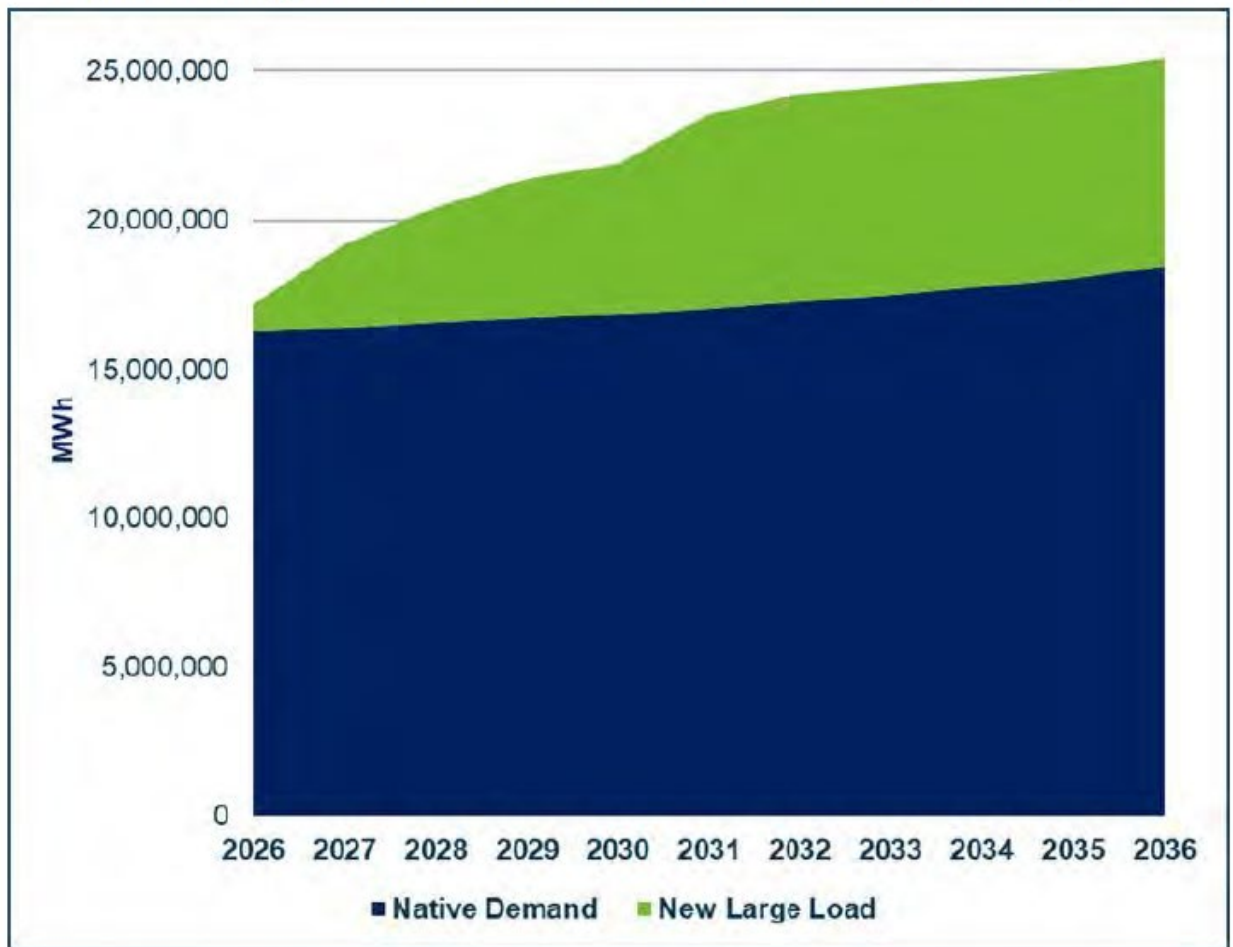
¹⁶ Both taken from the Evergy Missouri Metro 2026 Annual Update Integrated Resource Plan, Case No. EA-2026-0188, pp 25 and 26, respectively.

Figure 6: Evergy Metro Peak MW Load Forecast Including New Large Load



1

Figure 7: Evergy Metro Peak MWh Load Forecast Including New Large Load



Q. Is Mullin Creek #2 included in this increased scheduled capacity?

A. Yes, I believe so. The Company's application for the CCN states, "As discussed in the direct testimony of Mr. VandeVelde, Evergy Missouri Metro's 100% ownership in Mullin Creek #2 corresponds to 440 MW of thermal generation for EMM by 2031, as identified in the Company's 2025 and 2026 Annual IRP Updates."¹⁷ And in his direct testimony Mr. VandeVelde states, "Evergy Metro's

¹⁷ Evergy Missouri Metro, Application of Evergy Missouri Metro for a Certificate of Convenience and Necessity, Case No. EA-2026-0154, p 7.

2026 IRP forecasts winter capacity needs will exceed 300 MW by winter 2028/29, growing to almost 700 MW by winter 2031/32 and 800 MW by winter 2033/34.”¹⁸

Q. Does this increased need for capacity depend principally on the large load customers additions that Evergy Missouri Metro expects?

A. I believe so. Mr. VandeVelde states¹⁹ that the risks in delaying the Mullin Creek #2 project are increased costs for turbines due to a constrained turbine market, which is itself caused by data center load growth around the country, and that this in turn “could push the Project beyond the window needed to meet Metro’s capacity requirements.”²⁰ He further states that there are three large load customers that can be included in the Company’s IRP planning, and that these three large load customers alone account for an increase of approximately 900 MW “at steady state,” and that approximately 90% of that load is from expected large load customers in Evergy Missouri Metro’s service territory.²¹ He does note that “Evergy has a large pipeline of prospective new large load customers, but not all are included in base load planning until certain progress on Evergy’s internal review process has been met.”²² So, in addition to the nearly 900 MW of load from expected large load customers, there is likely more load that the Company will project in its future IRP updates. Thus, the addition of the Mullin Creek #2 plant is solely due to the addition of the large load customers.

¹⁸ Cody VandeVelde, Direct Testimony, Case No. EA-2026-0154, pp 11-12.

¹⁹ *Ibid.*, p 12.

²⁰ *Ibid.*, pp 12-13.

²¹ *Ibid.*

²² *Ibid.*

1 **Q. What is your assessment of how the costs of Mullin Creek #2 should be**
2 **allocated, or assigned, among, or to, Evergy Missouri Metro’s customer**
3 **classes in the future for ratemaking purposes?**

4 A. Because I believe that the large load customers are the cause of the need for the
5 Mullin Creek #2 plant, I believe that the Company should declare that the costs
6 of the project, including the requested Construction Work In Progress costs in
7 the Evergy Missouri Metro rate case (Case No. ER-2026-0143), will be allocated
8 entirely to the large load customers causing said costs, unless or until Evergy
9 Missouri Metro demonstrates otherwise.

10 This Commission repeatedly has stated in its decisions that cost causation is a
11 touchstone of rate design. Consistent with that sentiment, the National
12 Association of State Utility Consumer Advocates (“NASUCA”) passed Resolution
13 2026-02 Supporting Protections for Non-Hyperscale Load Customers From
14 Actual and Projected Hyperscale Load Growth. The resolution includes the
15 affirmations that “hyperscale load owners and operators should be held fully
16 responsible for all costs as well as financial and reliability risks they create”, that
17 “non-hyperscale load consumers should not be held responsible for any
18 incremental costs or financial risks of new infrastructure investments due to
19 projected or actual hyperscale load growth”, and that “NASUCA supports federal
20 and state efforts to ensure that hyperscale load customers appropriately bear
21 responsibility for capacity, energy, transmission, distribution, and related costs
22 that these customers impose on electric systems”.²³ This resolution, which the
23 OPC supports, is in line with the commitment Governor Mike Kehoe made²⁴ by

²³ National Association of State Utility Consumer Advocates, *Resolution 2026-02*: NASUCA Resolution Supporting Protections for Non-Hyperscale Load Customers From Actual and Projected Hyperscale Load Growth, <https://www.nasuca.org/wp-content/uploads/2026/07/2026-02-NASUCA-Hyperscale-Load-Growth-Resolution.pdf>.

²⁴ Jason Plautz, Zack Colman, et al., “GOP governors, utilities join Trump data center pledge”, Politico, July 14, 2026, <https://www.politico.com/news/2026/07/14/gop-governors-utilities-join-trump-data-center-pledge-00998098>.

1 signing the White House Ratepayer Protection Pledge, which calls on “the
2 leading United States hyperscalers and AI companies to build, bring, or buy all
3 of the energy needed for building and operating data centers, paying the full cost
4 of their energy and infrastructure, no matter what.”²⁵

5 In the Commission Report and Order for Case No. ER-2014-0258 the Findings of
6 Fact regarding cost allocation to different customer classes included finding that
7 certain classes had returns below what they should based on the costs they
8 caused to serve their load, and that others were contributing greater revenues
9 than the costs they caused to serve their load.²⁶ In the Decision to the question
10 “C. How should any rate increase be collected from the several customer classes”,
11 the Commission adopted Staff’s proposal in the case with the intention of
12 “moving closer toward actual cost of service”²⁷.

13 **III. DECISIONAL PRUDENCE**

14 **Q. What is your response to Evergy Missouri Metro witness Mr. Kevin**
15 **Gunn’s testimony for Evergy Missouri Metro’s request that the**
16 **Commission make a finding of decisional prudence in this case?**

17 **A.** I believe that the Commission should not make a finding of decisional prudence
18 in this docket because the need for the Mullin Creek #2 plant, as I have detailed
19 above, is for the large load customers, and said customers have not materialized
20 yet. The load being projected for these customers in the 2026 IRP Annual Update
21 is roughly 800 MW. This does not include the unknown amount of load from
22 those large load customers that the Company did not include in its projections
23 for capacity growth in the 2026 IRP Annual Update. This is a significant amount

²⁵ The White House, Ratepayer Protection Pledge, March 4, 2026,
<https://www.whitehouse.gov/releases/2026/03/ratepayer-protection-pledge/>.

²⁶ Missouri Public Service Commission Report and Order for Case No. ER-2015-0258 attached as
schedule JS-R-2. Cited information found on p 71.

²⁷ *Ibid.*, p 74.

1 of new load coming from one specific customer class. As such, the costs should
2 be borne by that customer class.

3 But, the Company has not stated that it intends to seek recovery of said costs
4 solely from that customer class, and instead has vaguely suggested that all
5 customers will be the causers of these costs. If the Company intends to argue in
6 a future rate case that it will burden the entirety of its customers with the high
7 cost of ****_____**** for this project that is only needed now for a very
8 specific class of customers, then I cannot support a finding of decisional prudence
9 in this case.

10 Mr. Gunn states that a finding of decisional prudence “provides certainty that
11 the Commission has determined building the facility to serve Evergy Metro’s
12 Missouri customers is prudent. This is crucial given the magnitude of the
13 investment anticipated by Evergy and the risks related to such a substantial
14 investment.”²⁸

15 Again, this suggests that the Company is claiming the need for the project is
16 somehow related to all customers. As I have shown above, this is not the case. I
17 believe that decisional prudence should not be granted because the large load
18 customers are not online yet, they pose a risk to all customers in the event that
19 their load drops off or they cannot cover costs anymore, and their needs for
20 immediate and large amounts of new generation should not cause existing
21 Evergy Missouri Metro customers’ bills to be increased.

22 **Q. Does this conclude your testimony?**

23 **A.** Yes.

²⁸ Kevin Gunn, Direct Testimony, Case No. EA-2026-0154, pp 25-26.

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

In the Matter of the Application of Evergy Metro,)
Inc., d/b/a Evergy Missouri Metro for Permission)
and Approval of a Certificate of Convenience and)
Necessity Authorizing It to Construct, Install,)
Own, Operate, Manage, Maintain, and Control a)
Natural Gas Electrical Production Facility)

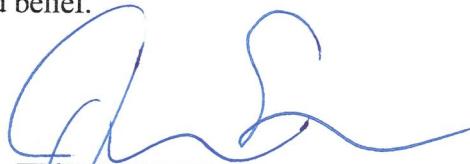
Case No. EA-2026-0154

AFFIDAVIT OF JORDAN SEAVER

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

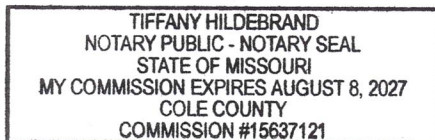
Jordan Seaver, of lawful age and being first duly sworn, deposes and states:

1. My name is Jordan Seaver. I am a Chief Economist for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

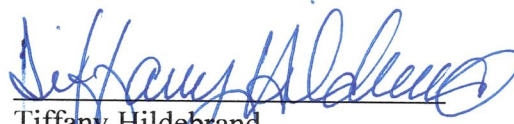


Jordan Seaver
Policy Analyst

Subscribed and sworn to me this 14th day of September 2026.



My Commission expires August 8, 2027.



Tiffany Hildebrand
Notary Public