

Exhibit No.:
Issue: Jurisdictional Allocators .
Witness: Ronald A. Klotz
Type of Exhibit: True-Up Rebuttal Testimony
Sponsoring Party: Evergy Missouri Metro
Case No.: ER-2026-0143
Date Testimony Prepared: September 23, 2026

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2026-0143

TRUE-UP REBUTTAL TESTIMONY

OF

RONALD A. KLOTZ

ON BEHALF OF

EVERGY MISSOURI METRO

**Kansas City, Missouri
September 2026**

TRUE-UP REBUTTAL TESTIMONY

OF

RONALD A. KLOTE

Case No. ER-2026-0143

I. INTRODUCTION

1 **Q: Please state your name and business address.**

2 A: Ronald A. Klotz. My business address is 1200 Main, Kansas City, Missouri 64105.

3 **Q: Are you the same Ronald A. Klotz who previously filed direct, rebuttal, surrebuttal,**
4 **and true-up direct testimony in this case?**

5 A: Yes.

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

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

8 **Q: What is the purpose of your true-up rebuttal testimony?**

9 A: The purpose of my testimony is to address the jurisdictional energy allocator used in the
10 case. In addition, the following Company witnesses also provide true-up rebuttal
11 testimony:

- 12 ▪ Linda Nunn
- 13 ▪ JP Meitner
- 14 ▪ Hsin Foo
- 15 ▪ Graham Jaynes
- 16 ▪ Darrin Ives
- 17 ▪ Melissa Hardesty
- 18 ▪ Geoffrey Ley

- 1 ▪ Ann Bulkley
- 2 ▪ Please note that the Company has attempted to address all substantive issues
- 3 raised by Staff and OPC or other parties which the Company contests. If
- 4 the Company inadvertently failed to address an issue raised by any party,
- 5 the absence of a response does not constitute agreement by the Company
- 6 with the party, and the Company may respond on the topic at hearing.

7 II. JURISDICTIONAL ALLOCATORS

8 **Q: Please describe the Company's position regarding the jurisdictional energy allocator**
9 **used in this proceeding.**

10 A: The Company believes the jurisdictional energy allocator should be updated using
11 information through the June 30, 2026, true-up date. The purpose of the true-up process is
12 to incorporate more current known and measurable information available at the time rates
13 are established. Applying updated information to the energy allocator is consistent with
14 that objective and results in a more accurate assignment of costs among jurisdictions.

15 **Q: Is the Company proposing a change to the methodology used to develop the energy**
16 **allocator?**

17 A: No. The Company is not proposing any change to the underlying methodology. Rather, the
18 Company is proposing that data inputs used within the existing methodology be updated
19 through the same June 30, 2026, true-up period utilized elsewhere in this case. The issue
20 is not methodology; it is whether the allocator should reflect more current information
21 available before rates are established.

1 **Q: How did Staff develop its direct-filed energy allocator in this case?**

2 A: Staff witness Alan J. Bax testified that Staff calculated the jurisdictional energy allocation
3 factors using normalized annual kilowatt-hour usage data and incorporated adjustments for
4 weather normalization, anticipated growth, and customer annualizations. Staff therefore
5 did not rely solely upon unadjusted historical information. Instead, Staff incorporated
6 adjustments intended to better reflect expected system usage. Further, Staff provided those
7 allocation factors to other Staff witnesses for use in assigning costs among the various
8 jurisdictions.

9 **Q: Does other Staff testimony support the use of updated information in this case?**

10 A: Yes. Multiple Staff witnesses rely upon updated information which reflects conditions as
11 of the true-up period.

12 **Q: Why is an update relevant to the jurisdictional energy allocator?**

13 A: The same ratemaking principle applies. Jurisdictional allocation factors are intended to
14 assign costs based upon how the system is actually used. If updated revenues, expenses,
15 and rate base impacts are reflected through the true-up period, then the energy allocator
16 should likewise be updated to reflect the most current usage information available. Using
17 updated information for some components of the revenue requirement while relying on
18 older information for cost allocation creates an unnecessary inconsistency within the case.

19 **Q: What is the benefit of updating the energy allocator through June 30, 2026?**

20 A: Updating the allocator through the true-up period better aligns the allocator with the same
21 time period underlying the remainder of the revenue requirement. This promotes a more
22 accurate assignment of costs among jurisdictions and ensures that the Commission's

determination is based on the most current known and measurable information available at the time rates are established.

Q: Does the Company's proposal simply apply the same true-up principles Staff has applied elsewhere in this case?

A: Yes. Throughout this proceeding, Staff has updated information where doing so improves the accuracy of ratemaking results. The Company's proposal simply applies that same principle to the jurisdictional energy allocator. If updated information is appropriate for determining revenues, customer annualizations, and other key components of the revenue requirement, then it is equally appropriate for determining the energy allocator used to assign costs among jurisdictions.

Q: Does Staff's concern regarding Customer A uncertainty justify refusing to update the energy allocator through the true-up period?

A: No. Jurisdictional allocators routinely incorporate normalized and annualized information. Staff itself relies on data regarding Customer A demand, load factor, and revenues throughout its true-up case. While some uncertainty remains, the existence of actual Customer A usage information through June 30, 2026 provides a more reliable basis than was available earlier in the case. The relevant question is not whether the information is perfect, but whether it represents the most current known and measurable information available at the time rates are established.

Q: Please summarize your recommendation to the Commission.

A: I recommend that the Commission utilize an energy allocator updated through the June 30, 2026 true-up date. Doing so does not involve a change in methodology. Rather, it ensures that the allocator reflects more current known and measurable information available and

1 maintains consistency with the true-up principles applied throughout the remainder of this
2 case.

3 **Q: Does this conclude your true-up rebuttal testimony?**

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

AFFIDAVIT OF RONALD A. KLOTE

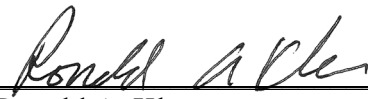
STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Ronald A. Klotz, being first duly sworn on his oath, states:

1. My name is Ronald A. Klotz. I work in Kansas City, Missouri and I am employed by Evergy Metro, Inc. as Sr. Director, Regulatory Affairs.

2. Attached hereto and made a part hereof for all purposes is my True-Up Rebuttal Testimony on behalf of Evergy Missouri Metro consisting of five (5) 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.



Ronald A. Klotz

Subscribed and sworn before me this 23rd day of September 2026.



Notary Public

My commission expires: April 26, 2029

