

Exhibit No.:
Issue: Fuel Prices and Fuel Inventory
Witness: JP Meitner
Type of Exhibit: True-Up Rebuttal Testimony
Sponsoring Party: Evergy Missouri Metro
Case No.: ER-2026-0143
Date Testimony Prepared: September 18, 2026

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2026-0143

TRUE-UP REBUTTAL TESTIMONY

OF

JP Meitner

ON BEHALF OF

EVERGY MISSOURI METRO

**Kansas City, Missouri
September 2026**

TRUE-UP REBUTTAL TESTIMONY

OF

JP MEITNER

Case No. ER-2026-0143

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

2 A: My name is JP Meitner. My business address is 818 South Kansas Avenue, Topeka, Kansas
3 66612.

4 **Q: Have you previously filed testimony in this proceeding?**

5 A: Yes. I adopted the direct testimony of Jessica Tucker, which was filed on February 6,
6 2026, I filed rebuttal testimony on August 11, 2026, and I filed surrebuttal testimony on
7 September 10, 2026.

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

9 A: I am testifying on behalf of Evergy Missouri Metro, Inc. d/b/a Evergy Missouri Metro
10 (“EMM” or the “Company”).

11 **Q: What is the purpose of your True-Up Rebuttal testimony?**

12 A: I will respond to Missouri Public Service Commission (“MPSC”) Staff witness Antonija
13 Nieto’s Surrebuttal / True-Up Direct Testimony regarding:

14 ■ Natural gas prices

15 I will also address the following topics:

16 ■ Staff’s treatment of coal prices in their production cost model at True-Up.

17 ■ Staff’s treatment of coal inventory at True-Up.

1 **I. Natural Gas Prices**

2 **Q: How does Staff witness Nieto respond to Company witness Foo's rebuttal testimony**
3 **regarding natural gas prices?**

4 A: Staff witness Nieto disagrees with the Company's recommendation regarding natural gas
5 prices used in the Company's production cost model. At True-Up, Staff recommends using
6 a twelve-month weighted average of actual natural gas commodity costs through June 30,
7 2026, after excluding prices associated with Winter Storm Fern. Staff contends that the
8 Company's use of forward market prices is inconsistent with the Matching Principle, and
9 the Known and Measurable Principle.

10 **Q: Do you agree with Staff witness Nieto's characterization of the Company's natural**
11 **gas pricing methodology?**

12 A: No. Staff characterizes the Company's methodology as replacing actual costs with
13 speculative forward prices. That does not accurately describe the Company's true-up
14 methodology. At True-Up, the Company updated its natural gas price assumptions using
15 actual prompt-month pricing from January 2025 through June 2026, and forward market
16 prices as of July 1, 2026, for the remaining eighteen months of the three-year normalization
17 period. Actual variable transportation costs were then added to determine the natural gas
18 price applicable to each gas-fired generating station. Accordingly, the Company's
19 methodology incorporates actual information through the end of the true-up period and
20 uses then-current forward market information only for the portion of the normalization
21 period for which actual prices are not yet available.

1 **Q: Why does the Company include forward market prices in its normalization?**

2 A: The purpose of normalization is to develop a representative level of natural gas prices for
3 use in determining normalized fuel and purchased power costs. Historical prices provide
4 useful information, but do not necessarily represent the market conditions expected during
5 the period rates will be in effect. The Company's methodology incorporates both actual
6 prices through True-Up and then-current market information regarding future prices, rather
7 than relying exclusively on a historical twelve-month average.

8 **Q: Staff witness Nieto characterizes forward natural gas prices as speculative. Do you**
9 **agree with that characterization?**

10 A: No. While forward prices are not a guarantee of the future spot price of natural gas, they
11 are observable market prices available as of a specific date. They represent prices at which
12 market participants can enter into transactions for future delivery or settlement of natural
13 gas. Staff witness Nieto acknowledges that a futures contract allows a buyer and seller to
14 commit today to a set price for delivery or settlement at a future date¹. These prices are
15 therefore not hypothetical or assumed values developed by the Company; they are
16 observable prices established through market transactions.

17 **Q: Do you consider those forward prices to be known and measurable?**

18 A: Yes. The forward prices used by the company are known and measurable as of the date
19 they are observed. The price quoted by the market on that date is objectively available and
20 verifiable. The Company is not asserting that the forward price guarantees what the future
21 spot price will be. Rather, it uses observable market pricing, together with actual pricing
22 through True-Up, to develop a reasonable normalized natural gas price.

¹ See. A. Nieto (Staff) Surrebuttal/True-Up Direct at 3, n. 6

1 **Q: What does Staff’s treatment of Winter Storm Fern demonstrate regarding the use of**
2 **historical actual prices?**

3 A: It demonstrates that the use of actual historical data does not eliminate the need for
4 normalization. Staff themselves determined that certain actual prices experienced during
5 the true-up period should be excluded because they were not representative of ongoing
6 conditions. I agree with the general principle that abnormal conditions should not dictate
7 the normalized level. The disagreement is therefore not whether normalization is
8 appropriate, but which methodology produces a more representative natural gas price for
9 purposes of the production cost model.

10 **Q: Do you agree that Staff’s twelve-month historical average is preferable because it is**
11 **based entirely on actual data?**

12 A: No. The fact that a price was experienced does not necessarily mean that it is representative
13 of the conditions expected during the period new rates will be in effect. Staff’s twelve-
14 month average is inherently backward-looking and gives weight to historical market
15 conditions simply because they occurred during the selected period. The Company’s
16 methodology incorporates actual information through True-Up while also recognizing
17 current market information for the remaining normalization period.

18 **Q: What do you recommend?**

19 A: I recommend that the Commission use the Company’s natural gas price assumptions. The
20 Company’s methodology incorporates actual information through True-Up, incorporates
21 current market information for periods for which actual prices are not yet available, and
22 produces normalized prices that are consistent with recent actual market experience. In my
23 opinion, this provides a more representative basis for determining normalized fuel costs,

1 purchased power costs, off-system sales revenues, and overall net system costs than Staff's
2 twelve-month historical average.

3 II. Coal Prices

4 **Q: How did Staff develop their coal prices used in their production cost model at True-**
5 **Up?**

6 A: Staff witness Nieto calculated a composite delivered coal price using coal deliveries made
7 during the twelve-month period ending June 30, 2026. Staff's methodology weights the
8 delivered price by tons received under the applicable coal supply and transportation
9 arrangements during that period.

10 **Q: How did the Company develop their coal prices at True-Up?**

11 A: The Company used actual June 2026 coal pricing where available. If no coal deliveries
12 occurred during June, the Company used actual pricing from the nearest month in which a
13 delivery occurred.

14 **Q: Do you agree with Staff's approach to determining coal prices?**

15 A: No. I believe the more appropriate approach is to use the actual delivered coal price from
16 June 2026, the final month of the true-up period, where available. Coal supply and
17 transportation costs can change as contracts expire, new contracts become effective, and
18 applicable pricing provisions change. A twelve-month average incorporates pricing from
19 earlier periods that may not reflect the contractual arrangements in effect at the end of the
20 true-up period. In contrast, using the most recent actual delivered price better reflects the
21 coal supply and transportation arrangements in effect as of the true-up date and provides a
22 more representative estimate of the costs expected when new rates are in effect.

1 **Q: Why does Staff's approach understate coal price?**

2 A: Staff's methodology blends earlier coal deliveries with deliveries made under the coal
3 supply and transportation arrangements in effect at the end of the true-up period. Because
4 certain earlier deliveries were made at lower prices, including pricing from those contracts
5 reduces Staff's composite delivered coal price. As a result, Staff's methodology produces
6 a normalized coal price below the most recent actual delivered cost and does not fully
7 reflect the pricing associated with the coal supply and transportation arrangements in effect
8 as of June 30, 2026.

9 **III. Coal Inventory**

10 **Q: How did Staff handle Coal Inventory in its True-Up?**

11 A: Staff used modeled burns to calculate coal inventory tons. In this case, using modeled burns
12 results in a significantly lower ending inventory value than actuals.

13 **Q: Do you agree with Staff's approach regarding coal inventory in their true-up**
14 **testimony?**

15 A: No, Staff witness Antonija Nieto's states in testimony that Fuel Inventory was updated.
16 However, the method for calculating coal inventory was unchanged. For coal inventory
17 calculations, I believe Staff should use the target inventory values provided in RB-74 rather
18 than modeled burns. RB-74 reflects the inventory levels EMM plans and manages to
19 maintain at the plant throughout the year and is therefore more consistent with the
20 assumptions with how the Company operates. By contrast, using modeled burns alone
21 effectively assumes inventory is reduced solely by consumption and does not account for
22 the target inventory levels that are actively maintained through fuel procurement and

1 inventory management decisions. As a result, the RB-74 values provide a more accurate
2 representation of expected coal inventory.

3 **Q: Why is it inappropriate to calculate coal inventory requirements using normalized**
4 **burn assumptions?**

5 A: Coal inventory management and fuel burn forecasting serve different purposes and should
6 not be conflated. A normalized burn assumption is intended to estimate expected fuel
7 consumption under average operating conditions. Coal inventory requirements, however,
8 are established to ensure that generating stations can continue operating reliably despite
9 uncertainties in fuel deliveries, commodity markets, transportation disruptions, weather
10 events, unit dispatch variability, and changes in system operating conditions.

11 By definition, a normalized burn projection reflects an average expectation and does not
12 account for the operational risks that inventory policies are intended to mitigate. Inventory
13 targets are established specifically to provide protection against those risks. Replacing
14 established inventory targets with normalized burn assumptions effectively eliminates the
15 reliability margin incorporated into the Company's fuel inventory practices.

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

17 A: Yes, it does.

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