

Exhibit No.:
Issue: Substation Disallowance
Witness: Andrew Rietcheck
Type of Exhibit: Sur-Surrebuttal 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

SUR-SURREBUTTAL TESTIMONY

OF

ANDREW RIETCHECK

ON BEHALF OF

EVERGY MISSOURI METRO

**Kansas City, Missouri
September 2026**

TABLE OF CONTENTS

I.	INTRODUCTION AND EXECUTIVE SUMMARY.....	1
II.	ADDITIONAL TRANSMISSION DISALLOWANCES FIRST PRESENTED IN OPC SURREBUTTAL.....	3
A.	WOLF CREEK TRANSFORMERS	3
B.	LEEDS–WINCHESTER AND BRUNSWICK–CARROLLTON TRANSMISSION LINES	12
C.	CLAYCOMO SUBSTATION	16

SUR-SURREBUTTAL TESTIMONY

OF

ANDREW RIETCHECK

CASE NO. ER-2026-0143

I. INTRODUCTION AND EXECUTIVE SUMMARY

Q. Please state your name and business address.

A. My name is Andrew Rietcheck. My business address is 818 S. Kansas Avenue, Topeka, Kansas.

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

A. I am employed by Evergy Kansas Central, Inc. and serve as Senior Director of Large Construction and Substation Maintenance for Evergy Kansas Central, Inc. d/b/a as Evergy Missouri Metro (“Evergy Missouri Metro,” “EMM,” or the “Company”), Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”), 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 Andrew Rietcheck who previously filed rebuttal testimony in this docket?

A. Yes.

Q. On whose behalf are you testifying?

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

1 **Q. What is the purpose of your sur-surrebuttal testimony?**

2 A. The purpose of my testimony is to respond to recommendations made by the Wired Group
3 witnesses Paul Alvarez and David Shapley on behalf of the Office of Public Counsel
4 (“OPC”). Specifically, I will address their recommendations that the Commission should
5 order an additional \$73.110 million in disallowances that were not previously provided in
6 OPC’s direct filing. Company Witness Buck Reuter will provide testimony concerning the
7 \$14.700 million associated with transmission facilities constructed to serve the Panasonic
8 plant.

9 **Q. Have you reviewed the surrebuttal testimony of OPC’s consultants Paul Alvarez and**
10 **David Shapley?**

11 A. Yes, I have.

12 **Q. Do you agree with these additional disallowances from Paul Alvarez and David**
13 **Shapley which the Company first saw in their surrebuttal testimony?**

14 A. No, I do not. At a fundamental level, the Wired Group’s recommendations for equipment
15 replacement are based on a reactive asset management philosophy that generally assumes
16 equipment should remain in service until it outright fails, fails objective testing, or is
17 incapable of providing safe and reliable service. That framework is inconsistent with
18 modern utility asset management practices. There are several other factors taken into
19 consideration when determining if a piece of equipment is demonstrating an imminent
20 inability to provide reliable, cost-effective service. Utilities are expected to proactively
21 manage risk and financial prudence through condition monitoring, engineering
22 assessments, diagnostic testing, lifecycle planning, and asset-health evaluations in order to

mitigate reliability and operational risks before customers experience outages or equipment failures.

II. ADDITIONAL TRANSMISSION DISALLOWANCES FIRST PRESENTED IN OPC SURREBUTTAL

Q. What additional transmission disallowances did OPC first recommend in surrebuttal testimony?

A. OPC witnesses David Shapley and Paul Alvarez recommended for the first time in surrebuttal an additional \$87.810 million of transmission-related disallowances: \$73.110 million concerning Wolf Creek, Leeds–Winchester, Brunswick–Carrollton, and Claycomo projects, plus ** [REDACTED] ** associated with transmission facilities constructed to serve the Panasonic plant. These recommendations were not included in OPC’s direct case.

Q. Why is the timing of these recommendations significant?

A. OPC elected not to make these recommendations in its direct testimony, where Evergy would have had the ordinary opportunity to respond through rebuttal testimony. Presenting substantial new disallowances for the first time in surrebuttal compresses the Company’s review period, requires responses outside the normal testimony sequence, and eliminates the opportunity for Company witnesses to address the factual, engineering, accounting, allocation, tariff, and policy arguments on which OPC relies. Evergy is therefore disadvantaged and prejudiced unless the Commission declines to consider the late adjustments or affords the Company a full and fair opportunity to respond.

A. Wolf Creek Transformers

Q. What is Mr. Shapley’s recommendation concerning the Wolf Creek transformers?

A. Mr. Shapley recommends that the Commission disallow \$15.21 million associated with the replacement of TX-4, TX-5, and TX-6. He does not challenge the need to replace TX-7,

1 which had deteriorating test results. Instead, he characterizes TX-4, TX-5, and TX-6 as
2 three “extra” transformers that the Company replaced prematurely when it undertook the
3 TX-7 replacement. Mr. Shapley calculates his recommended disallowance by taking the
4 Company’s approximately \$20.28 million share of the overall project cost and allocating
5 three-fourths of that amount to TX-4, TX-5, and TX-6.

6 Mr. Shapley acknowledges that Wolf Creek’s approximately 18-month refueling
7 outages provide opportunities to perform transformer replacement work. However, he
8 contends the Company should have replaced TX-7 during the applicable refueling outage
9 and then continued operating TX-4, TX-5, and TX-6 until each transformer independently
10 required replacement. Under his suggested approach, each later replacement could have
11 been scheduled for a future refueling outage after the Company determined that
12 replacement of the particular transformer had become necessary. He therefore interprets
13 the Company’s decision to replace all four transformers as a matter of convenience rather
14 than a sufficiently supported reliability or operational decision. He also cites the remaining
15 netbook value of the retired equipment as an indication that the replacements were
16 premature.

17 As explained below, Mr. Shapley’s characterization does not account for the
18 condition evidence concerning TX-4, TX-5, and TX-6, the related functions performed by
19 the four transformers, the limitations and vulnerabilities of the former station power
20 configuration, or the reliability, redundancy, maintainability, and operational benefits
21 achieved through the comprehensive project.

1 **Q. Mr. Shapley concludes the replacement of the three other transformers, TX-4, TX-5,**
2 **and TX-6, was simply done out of convenience. What information is Mr. Shapley**
3 **basing his conclusion on?**

4 A. Mr. Shapley's conclusion appears to be based primarily on a limited portion of the
5 Company's response to OPC Data Request 5033, where the Company explained that a
6 piecemeal replacement strategy would have required additional future outages, repeated
7 engineering and construction mobilizations, increased costs, and increased operational risk.
8 However, Mr. Shapley's testimony does not meaningfully address the remainder of the
9 Company's explanation provided in OPC Data Requests 5033 and 5069. Those responses
10 describe the condition concerns identified on TX-4, TX-5, and TX-6, the transformers'
11 nuclear safety-related functions, the reliability and operational limitations of the existing
12 configuration, TX-6-specific transmission constraints, and the benefits achieved through
13 the comprehensive station power system modernization project.

14 The Company's evaluation considered transformer age together with dissolved gas
15 analysis results, Doble test results, documented equipment degradation, operational
16 considerations, and the nuclear safety-related functions of the transformers. Consistent
17 with these considerations, industry guidance recognizes that transformer replacement
18 decisions should consider asset condition, age, operational importance, and long-term asset
19 management objectives rather than any single factor in isolation. The Company therefore
20 did not base its decision solely on convenience, nor solely on age.

21 By reducing the Company's stated justification to a question of convenience, Mr.
22 Shapley does not address the full set of engineering, operational, reliability, safety, and
23 long-term asset management considerations that supported the project. As a result, his

1 recommendation to disallow costs associated with TX-4, TX-5, and TX-6 is based on an
2 incomplete characterization of the Company's rationale for the project.

3 **Q. Can you provide the full explanation and justification of the Wolfcreek Transformer**
4 **Project?**

5 A. Yes. As the Company explained in its response to OPC DR 5033 and OPC DR 5069, The
6 Wolf Creek transformer project was developed as a comprehensive modernization of the
7 station power system rather than a one-for-one replacement of Transformer 7. While the
8 deteriorating condition of TX-7 was a significant driver for the project, engineering
9 evaluations also identified aging, reliability, operational, and maintainability concerns
10 associated with TX-4, TX-5, and TX-6. These transformers supported one of Wolf Creek's
11 required offsite power sources and were approaching similar stages in their service life.
12 Evaluations indicated that TX-4, TX-5, and TX-6 exhibited age-related degradation and
13 gassing concerns similar to those identified on TX-7. As a result, replacing only TX-7
14 would have deferred, rather than resolved, broader reliability concerns affecting the station
15 power system.

16 The Company's evaluation considered transformer age together with dissolved gas
17 analysis results, Doble test results, documented equipment degradation, and the nuclear
18 safety-related functions of the transformers. Consistent with these considerations, industry
19 guidance, including EPRI Report No. 1013566, Large Transformer End-of-Expected-Life
20 Considerations and the Need for Planning, recognizes that large power transformer
21 replacement decisions should consider a combination of asset condition, age, operational
22 importance, and long-term asset-management considerations. Accordingly, the Company's

1 evaluation and decision to replace TX-4, TX-5, and TX-6 were not based solely on
2 transformer age.

3 Wolf Creek is a nuclear generating facility and cannot utilize a run-to-failure
4 maintenance strategy for equipment supporting nuclear safety-related and risk-significant
5 functions. Accordingly, replacement decisions are based on equipment condition,
6 reliability, operational requirements, safety considerations, and regulatory obligations.
7 Although TX-4, TX-5, and TX-6 were not part of the normal operating lineup, they
8 remained essential to maintaining a required offsite power source and therefore were
9 subject to the high reliability expectations applicable to nuclear generation facilities.

10 Additional project-specific considerations supported replacement of TX-4, TX-5,
11 and TX-6 during the same effort. A piecemeal replacement strategy would have required
12 multiple future refueling outages, repeated engineering and construction mobilizations,
13 increased costs, additional operational risk, and reduced overall efficiency. Given the
14 limited availability of refueling outage windows at Wolf Creek, replacing all four
15 transformers as part of a coordinated project represented the most operationally prudent
16 and cost-effective approach

17 TX-6 presented further concerns beyond age and condition. TX-6 was a unique
18 transformer on the Evergy transmission system, creating long-term maintenance and spare-
19 equipment challenges. In addition, TX-6 had become a transmission constraint as changing
20 system conditions increased power flows through the area, and its connection to the East
21 345 kV Bus created outage constraints affecting both the Wolf Creek Plant and Wolf Creek
22 Substation. These factors provided further justification for including TX-6 in the overall
23 replacement project.

1 The approved project retired TX-4, TX-5, TX-6, and TX-7 and installed a new
2 standardized configuration consisting of TX-8, TX-9, TX-10, and TX-11. The new
3 configuration improved reliability, redundancy, maintainability, operational flexibility,
4 and long-term supportability while providing two redundant supply paths for one of the
5 station's required offsite power sources. This approach addressed existing equipment
6 condition concerns, reduced future outage risk, and positioned the station power system for
7 long-term reliable operation.

8 **Q. Can you further describe the benefits to the new configuration?**

9 A. Yes. The replacement project provided significant operational and reliability benefits
10 beyond addressing the condition concerns associated with TX-4, TX-5, TX-6, and TX-7.
11 The new configuration eliminated the limitations associated with the previous station
12 power arrangement by replacing the existing transformers with standardized transformer
13 banks consisting of TX-8, TX-9, TX-10, and TX-11. The upgraded design allows the 69
14 kV system to be served through parallel transformer arrangements, improving redundancy
15 and operational flexibility. The project also eliminated concerns associated with TX-6
16 being undersized during periods of high wind generation transfers, a condition that had
17 resulted in transmission constraints and the establishment of an SPP flowgate.

18 The new configuration further improves maintainability and system resiliency by
19 allowing the East Bus to be removed from service without impacting transformer
20 availability or plant station power. Under the previous configuration, maintenance
21 activities or faults associated with the East Bus could directly affect TX-6 and station
22 power arrangements. The new arrangement removes those constraints and provides greater
23 flexibility during maintenance and outage conditions.

1 In addition, the project provides two redundant power sources to XNB01 (safety
2 related switch gear bus that receives one of Wolf Creek's required offsite power sources)
3 and two redundant power sources to Switchgear 7 and Switchgear8, enhancing the
4 reliability of station service power supplied to the plant. The configuration also allows TX-
5 8, TX-9, TX-10, and TX-11 to be serviced while maintaining system functionality due to
6 the increased redundancy built into the design. Customer-serving 69 kV transmission lines
7 are similarly supported by redundant transformer sources that can be switched during
8 maintenance activities, improving reliability for both plant operations and the surrounding
9 transmission system.

10 **Q. Could the remaining transformers have been replaced individually during future**
11 **refueling outages, as Mr. Shapley suggests?**

12 A. That assertion incorrectly assumes that the Company's objective was simply to replace
13 individual transformers. The project objectives extended beyond replacing aging
14 equipment and included implementing a new station power system configuration. A
15 piecemeal replacement strategy would have retained the legacy configuration for an
16 extended period and would not have achieved the reliability, redundancy, operational
17 flexibility, and long-term supportability benefits associated with the selected design.
18 Accordingly, the relevant question is not whether individual transformers could have
19 remained in service longer, but whether retaining the existing configuration would have
20 achieved the project's objectives. It would not have met those objectives.

1 **Q. Was the Company's decision to complete the work as a single project a matter of**
2 **convenience?**

3 A. No. As I explained above, the decision was based on engineering, operational, reliability,
4 outage-management, and lifecycle-cost considerations, not convenience. The project
5 addressed aging infrastructure, documented equipment degradation, system-reliability
6 objectives, redundancy improvements, and long-term asset-management considerations.
7 Reducing future outage work, engineering efforts, construction mobilizations, testing and
8 commissioning activities, and operational risk are legitimate project benefits and should
9 not be characterized as mere matters of convenience.

10 **Q. Could future replacements have been performed in the same manner as TX-7?**

11 A. Mr. Shapley's conclusion assumes future replacements could be executed under conditions
12 identical to those existing when TX-7 was scheduled for replacement. That assumption
13 does not account for uncertainties involving future equipment condition, outage scopes,
14 procurement lead times, construction mobilizations, system operating requirements,
15 resource availability, and replacement logistics. For a nuclear generating station, prudent
16 asset management requires consideration not only of current equipment condition but also
17 of the long-term reliability, maintainability, and availability of systems that support safe
18 plant operation and protection of the public. The Company determined that implementing
19 the complete configuration in a single project represented the most prudent and cost-
20 effective means of achieving the project's objectives.

1 **Q. Do you agree with Mr. Shapley that convenience does not justify prospective**
2 **equipment replacement?**

3 A. Yes, convenience alone would not justify replacing utility assets. But convenience was not
4 the basis for the Company's decision. The project addressed aging infrastructure,
5 documented equipment degradation, reliability concerns, operational requirements, and
6 long-term supportability objectives while implementing a new power system configuration
7 designed to improve redundancy and the reliability of offsite power supporting the plant's
8 safety-related electrical systems.

9 **Q. Does the approximately \$1 million of remaining netbook value demonstrate that the**
10 **transformers were replaced prematurely?**

11 A. No. Remaining netbook value is an accounting measure; it is not an indicator of equipment
12 condition, reliability, operational risk, fitness for continued service, or the prudence of a
13 system-modernization project. Utility asset-replacement decisions are based on
14 engineering evaluations, condition-monitoring results, documented degradation,
15 operational considerations, risk management, and long-term asset-management objectives.
16 The existence of remaining netbook value neither negates the benefits achieved through
17 the project nor demonstrates that replacement was premature.

18 **Q. What is your overall conclusion regarding Mr. Shapley's analysis of the Wolf Creek**
19 **transformer project?**

20 A. Mr. Shapley evaluates the project as though it were a series of independent transformer
21 replacements. It was not. The project was a comprehensive modernization and
22 reconfiguration of the Wolf Creek station power system designed to address aging
23 infrastructure and equipment-condition concerns while improving reliability, redundancy,

operational flexibility, long-term supportability, and the reliability of offsite power sources supporting safe nuclear plant operation. His proposed alternative would have deferred portions of the project and preserved the legacy configuration, thereby failing to achieve the objectives underlying the Company's decision.

B. Leeds–Winchester and Brunswick–Carrollton Transmission Lines

Q. Does the number of poles identified for attention during a particular inspection determine whether a transmission-line rebuild was prudent?

A. No. A pole inspection is one input into an assessment of an integrated transmission line; it is not a comprehensive measure of the line's condition or the prudence of a rebuild. A project evaluation may also consider the age and condition of the line as a whole, conductor condition, structures and foundations, hardware, critical crossings, safety, clearances, line performance, access, constructability, future system needs, and the cost and risk of repeatedly replacing individual components while continuing to operate the remaining aging facilities.

Q. Does Mr. Shapley compare his proposed piecemeal alternative with the actual rebuild scope on cost, risk, reliability, capacity, outage requirements, and lifecycle value?

A. No. Mr. Shapley does not perform a project-specific comparison of the rebuilds against a defined piecemeal alternative. Instead, he relies principally on his characterization of pole age, the number of structures identified for attention through particular inspections, and remaining net book value. That approach does not quantify the cost, outage requirements, safety exposure, construction risk, reliability consequences, or lifecycle implications of repeatedly replacing individual structures and repairing conductor while leaving the remainder of each aging line in service.

1 **Q. What does Mr. Shapley state concerning the Leeds–Winchester transmission-line**
2 **rebuild?**

3 A. Mr. Shapley states that the average age of the poles replaced was approximately 30 years,
4 that only two of 119 poles failed formal inspections, and that the retired equipment had
5 \$169,000 of remaining net book value, or almost 20 percent of original cost. Each statement
6 materially mischaracterizes the project information the Company provided in response to
7 OPC Data Request 5038.

8 **Q. What are the correct facts concerning the Leeds–Winchester project?**

9 A. The average age of the poles was more than 45 years when the line was rebuilt, not 30
10 years. The rebuild removed 33 structures, not 119 poles. Of the structures inspected before
11 the rebuild, four were identified as needing replacement within the next 18 months. The
12 remaining netbook value was \$73,322.80, not \$169,000. Of that amount, \$73,245.24 was
13 associated with fiber-optic cable that could not be reused because relocation of the dead-
14 end structures changed the cable locations. Thus, only \$77.56 of the remaining netbook
15 value related to property other than that fiber-optic cable. These facts were provided in the
16 Company's response to OPC Data Request 5038.

17 **Q. Why was the Leeds–Winchester line rebuilt?**

18 A. The line was rebuilt because of its overall age and condition. It was primarily a 1950s-
19 vintage line that had reached the end of its useful service life. The line also includes critical
20 crossings over interstate highways and several major thoroughways, portions of which were
21 more than 65 years old. Those conditions required the Company to evaluate the integrity
22 and risk of the line as a complete operating asset, rather than limiting its assessment to the
23 number of poles identified for near-term attention through one inspection process.

1 **Q. What does Mr. Shapley state concerning the Brunswick–Carrollton transmission-line**
2 **rebuild?**

3 A. Mr. Shapley states that the average pole age was 50 years and was not relatively old, points
4 to an asserted 98-year-old pole on EMM’s system, and states that only eight of 254 poles
5 failed formal inspections. Those statements omit material facts provided in response to
6 OPC Data Request 5040 and do not account for the condition of the conductor.

7 **Q. What are the correct facts concerning the age and condition of the Brunswick–**
8 **Carrollton facilities?**

9 A. The majority of the poles were 1951 vintage and were placed in service in 1953. Fewer
10 than one percent of the approximately 20,000 poles on EMM’s transmission system are
11 older than the poles replaced in this project. Further, the oldest wood pole on the EMM
12 transmission system is 1945 vintage and is currently approximately 81 years old, not 98
13 years old. The project therefore involved facilities at the extreme upper end of the age
14 distribution on EMM’s transmission system.

15 **Q. Did only eight structures present condition concerns?**

16 A. No. Eight structures were identified during the annual visual inspection as requiring
17 attention within the next 18 months. In addition, the 2018 detailed intrusive inspection
18 identified 20 structures that had deteriorated below their minimum design strength and
19 were tagged as rejected. Focusing only on the eight structures from the annual visual
20 inspection omits the rejected structures identified through the more detailed intrusive
21 inspection. The information concerning those inspections was provided in the Company’s
22 response to OPC Data Request 5040.

1 **Q. Were pole conditions the only asset-health concern supporting the Brunswick–**
2 **Carrollton rebuild?**

3 A. No. The inspection worksheets did not capture the condition of the conductor. Previous
4 maintenance work had identified widespread broken conductor strands. The condition had
5 become sufficiently serious that many planned individual structure replacements were
6 canceled because transferring the existing conductor to new structures presented safety
7 concerns. That evidence demonstrates why counting poles identified through a particular
8 inspection does not measure the condition of the line as a whole and does not establish that
9 a rebuild was premature.

10 **Q. What is your conclusion regarding Mr. Shapley’s recommended disallowance for the**
11 **Leeds–Winchester transmission-line rebuild?**

12 A. The Commission should reject the recommended disallowance. Mr. Shapley’s analysis
13 rests on incorrect pole-age, structure-count, inspection, and remaining-net-book-value
14 figures and does not evaluate the line as an integrated transmission asset. The Company’s
15 decision reasonably considered the line’s overall age and condition, its critical interstate
16 and major-throughway crossings, and the risks and lifecycle implications of continuing
17 piecemeal work on aging facilities. His testimony does not establish that the rebuild was
18 premature or imprudent.

19 **Q. What is your conclusion regarding Mr. Shapley’s recommended disallowance for the**
20 **Brunswick–Carrollton transmission-line rebuild?**

21 A. The Commission should reject that recommended disallowance as well. Mr. Shapley
22 focuses on a single inspection count and an inaccurate comparison to the oldest pole on the
23 system, while omitting the 20 structures rejected through detailed intrusive inspection and

1 the widespread broken conductor strands that created safety concerns and prevented
2 planned individual structure replacements. The project involved facilities at the extreme
3 upper end of EMM's transmission-pole age distribution, and the complete condition record
4 supports the Company's decision to rebuild the line.

5 **C. Claycomo Substation**

6 **Q. Is Mr. Shapley's conclusion that a ring-bus configuration is only marginally more**
7 **reliable supported by a project-specific analysis of Claycomo?**

8 A. No. His testimony does not identify a project-specific reliability, operational, protection,
9 maintenance, contingency, safety, or constructability analysis demonstrating that the
10 Claycomo configuration change lacked value. The absence of Mr. Shapley's preferred
11 dollar-denominated benefit-cost study does not establish that the engineering justification
12 was absent or that the project was imprudent.

13 **Q. What assets and condition concerns principally drove the Claycomo modernization**
14 **project?**

15 A. The principal assets for which age, asset-health, and condition considerations drove
16 replacement were Transformers TX-7, TX-9, and TX-56; the associated 161 kV circuit
17 switchers; and related protection and control equipment. The project addressed aging
18 transformer and station infrastructure, including a substantial population of legacy
19 electromechanical relays and protection systems that had become increasingly obsolete and
20 difficult to maintain. The transformers ranged from approximately 36 to 57 years old when
21 replaced: TX-9 was manufactured in 1964, TX-56 in 1975, and TX-7 in 1985. The
22 Company evaluated those ages together with the assets' condition assessments, diagnostic

1 results, operating functions, maintainability, and the risks associated with continued
2 operation.

3 **Q. What did the condition assessments show for the three transformers?**

4 A. TX-7 exhibited active gassing, elevated moisture and oil-quality concerns, and diagnostic
5 indicators consistent with thermal-fault activity. TX-9 showed insulation-system aging,
6 degraded fluid quality, elevated furan indicators, and significant load-tap-changer
7 diagnostic concerns. In particular, its selector compartment received a condition rating of
8 4, acetylene concentrations were elevated, and the diagnostic findings called for immediate
9 investigation. TX-56 also exhibited age-related oil-quality and gassing concerns, although
10 its diagnostic results were less severe than those observed on TX-9. Collectively, the
11 transformers' advanced ages and condition-assessment results demonstrated developing
12 internal degradation and supported replacement to improve long-term reliability and reduce
13 operational risk.

14 **Q. Why was it reasonable to address the protection and control equipment as part of the**
15 **same project?**

16 A. The transformer replacements were not isolated from the balance of the station. The
17 associated 161 kV circuit switchers and a large population of legacy electromechanical
18 relays and protection systems were also aging, increasingly obsolete, and becoming more
19 difficult to maintain and support. Addressing those interdependent assets through a
20 coordinated modernization avoided retaining obsolete protection and control equipment
21 around newly installed primary equipment and improved the station's long-term reliability,
22 maintainability, and supportability.

1 **Q. What operating benefits did the ring-bus configuration provide, including isolation**
2 **capability, maintenance flexibility, contingency performance, protection**
3 **functionality, and reduced exposure to a single bus event?**

4 A. In addition to addressing deteriorating and obsolete assets, the ring-bus configuration
5 improved the station's ability to isolate equipment and portions of the bus for faults or
6 maintenance while keeping unaffected facilities in service. It reduced exposure to a single
7 bus event, enhanced contingency performance, provided greater maintenance and
8 operating flexibility, and enabled modernized protection functionality. Those benefits must
9 be considered together with the transformer, circuit-switcher, and protection-system
10 condition evidence. Mr. Shapley's characterization of the ring bus in isolation does not
11 evaluate the integrated purpose or benefits of the Claycomo modernization project.

12 **Q. Is the retired plant's remaining net book value evidence of imprudence, or is it an**
13 **accounting fact that must be considered together with the project's condition,**
14 **function, risk, and benefits?**

15 A. It is an accounting fact, not proof of imprudence. Remaining net book value does not
16 measure transformer insulation condition, dissolved-gas activity, oil quality, load-tap-
17 changer condition, equipment obsolescence, maintainability, protection-system
18 functionality, or the operational risk of continuing to operate an aging station configuration.
19 The prudence inquiry must consider the information reasonably available when the
20 Company made its decision, including the age and condition of TX-7, TX-9, and TX-56,
21 the associated circuit switchers, the obsolete protection and control equipment, and the
22 reliability and operating benefits of the modernization. Remaining net book value does not
23 negate that evidence.

1 **Q. What is your overall conclusion regarding OPC's additional transmission**
2 **disallowances?**

3 A. The recommendations should be rejected because they were first presented after OPC's
4 direct case and because they rely on selective indicators, generalized assumptions, and
5 unsupported proxies rather than complete project-specific engineering and cost evidence.
6 The challenged investments should be evaluated on the information reasonably available
7 when the decisions were made, the alternatives considered, the risks addressed, the system
8 and customer benefits obtained, and the applicable tariffs and allocation requirements—
9 not through hindsight or a single preferred analytical method.

10 **Q. Does that conclude your testimony?**

11 A. Yes, it does.

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

In the Matter of Evergy Metro, Inc. d/b/a Evergy)
Missouri Metro's Request for Authority to)
Implement A General Rate Increase for Electric)
Service)
Case No. ER-2026-0143

AFFIDAVIT OF ANDREW RIETCHECK

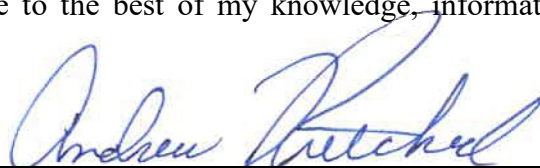
STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Andrew Rietcheck, being first duly sworn on his oath, states:

1. My name is Andrew Rietcheck. I work in Topeka, Kansas, and I am employed by Evergy Kansas Central, Inc. as Senior Director of Large Construction and Substation Maintenance.

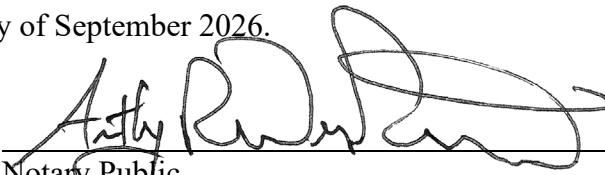
2. Attached hereto and made a part hereof for all purposes is my Sur-Surrebuttal Testimony on behalf of Evergy Missouri West consisting of nineteen (19) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

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.



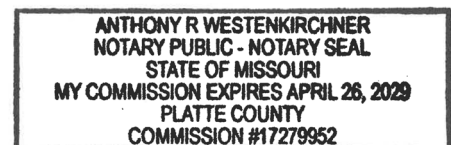
Andrew Rietcheck

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



Notary Public

My commission expires: April 26, 2029



Evergy Metro, Inc. d/b/a Evergy Missouri Metro

Docket No.: ER-2026-0143

Date: September 10, 2026

CONFIDENTIAL INFORMATION

The following information is provided to the Missouri Public Service Commission under
CONFIDENTIAL SEAL:

Document/Page	Reason for Confidentiality from List Below
Rietcheck p. 3, ln 10	3 and 6

Rationale for the “confidential” designation pursuant to 20 CSR 4240-2.135 is documented below:

1. Customer-specific information;
2. Employee-sensitive personnel information;
3. Marketing analysis or other market-specific information relating to services offered in competition with others;
4. Marketing analysis or other market-specific information relating to goods or services purchased or acquired for use by a company in providing services to customers;
5. Reports, work papers, or other documentation related to work produced by internal or external auditors, consultants, or attorneys, except that total amounts billed by each external auditor, consultant, or attorney for services related to general rate proceedings shall always be public;
6. Strategies employed, to be employed, or under consideration in contract negotiations;
7. Relating to the security of a company's facilities; or
8. Concerning trade secrets, as defined in section 417.453, RSMo.
9. Other (specify) _____.

Should any party challenge the Company’s assertion of confidentiality with respect to the above information, the Company reserves the right to supplement the rationale contained herein with additional factual or legal information.