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Witness: Bradley D. Lutz
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Sponsoring Party: Evergy Missouri West
Case No.: ER-2027-0077
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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2027-0077

DIRECT TESTIMONY

OF

BRADLEY D. LUTZ

ON BEHALF OF

EVERGY MISSOURI WEST

Kansas City, Missouri
November 2026

TABLE OF CONTENTS

1. Rate Case Commitment Update 3
2. Rate Design Strategy 9
3. Customer Rate Design Education 16
4. Lighting Tariff Modifications 17
5. Rules & Regulations Modifications 19

Overall Structure and Major Terms 20
Promotional Practices Conversion to Customer Support Programs 22
Definitions 23
Grid Interconnection Policy 24
Multiple-Occupancy & Redistribution 26
Modification to Choice and Application of Rates 29
Other Rule Changes 31

6. Class Cost of Service 32
7. Service & Access Charge for Solar Subscription Service 38
8. Stand-by Rate Schedule Modifications 39
9. Parallel Generation Rate Schedule Modifications 41
10. Tariff Clean-up and Miscellaneous Changes 42

DIRECT 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" of "EMM"), 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: On whose behalf are you testifying?

A**:** I am testifying on behalf of Evergy Missouri West ("EMW" or "Company").

Q: What are your responsibilities?

A: My current responsibilities are focused on rates, regulatory operations and customer issues, providing support and oversight for a wide range of regulatory work including determination of retail revenues, load analysis, rate design, class cost of service, tariff administration, compliance reporting, response to customer complaints, docket management system administration, general tariff administration, and relationship development for Evergy's regulatory activities in the Missouri and Kansas jurisdictions.

Q: Please describe your education, experience, and employment history.

A: I hold a Master of Business Administration from Northwest Missouri State University and a Bachelor of Science degree in Engineering Technology from Missouri Western State University.

I joined Evergy, then Kansas City Power & Light, in August 2002 as an Auditor in the Audit Services Department. I moved to the Company's Regulatory Affairs group in September 2005 as a Regulatory Analyst where my primary responsibilities included support of our rate design and class cost of service efforts. I was promoted to Manager in November 2010 and was promoted to my current position in March 2020.

Prior to joining Evergy, I was employed by the St. Joseph Frontier Casino for two years as Information Technology Manager. Prior to the St. Joseph Frontier Casino, I was employed by St. Joseph Light and Power Company for nearly 14 years. I held various technical positions at St. Joseph Light and Power Company, including Engineering Technician-Distribution, Automated Mapping/Facilities Management Coordinator, and my final position as Senior Client Support Specialist-Information Technology.

Q: Have you previously testified in a proceeding before the Missouri Public Service Commission ("Commission" or "MPSC") or before any other utility regulatory agency?

A: Yes, I have testified multiple times before the Commission concerning tariff, class cost of service, and rate design topics as part of various recent proceedings. Additionally, I have testified multiple times before the Kansas Corporation Commission.

Q: What is the purpose of your testimony?

A: I will address the following topics in my testimony:

- Rate Case Commitment Update
- Rate Design Strategy
- Customer Rate Design Education
- Lighting Tariff Modifications
- Rules & Regulations Modifications
- Class Cost of Service
- Service & Access Charge for Solar Subscription Rider
- Stand-by Rate Schedule Modifications
- Parallel Generation Rate Schedule Modifications
- Tariff Clean-up and Miscellaneous Changes

This testimony will closely follow and in some ways replicate the recommendations made in ER-2026-0143, the Missouri Metro rate case. Since this EMW filing is occurring before the final Commission order is issued, the recommendations made in this testimony will not reflect the ordered outcomes for any contested issues.

Q: Why is the outcome of the EMM case important to this EMW filing?

A: The Company has devoted considerable effort to aligning the rate structures of its Missouri jurisdictions. As we draw closer together, the outcomes of one case can dramatically affect the steps proposed in the other. In this EMW filing, we are assuming that the Company proposals and Company-related stipulations & agreements will be ordered by the Commission, and we make these proposals to seek alignment with those outcomes. I will file Supplemental Direct Testimony should any aspects of the final order in ER-2026-0143 influence the recommendations made in this testimony.

1. Rate Case Commitment Update

Q: Please describe your testimony concerning rate case commitments.

A: In the Company's last rate case, ER-2024-0189, the Parties reached a Unanimous Stipulation and Agreement ("Agreement") on October 2, 2024, that was approved by the Commission on December 2, 2024, and effective on December 14, 2024. My testimony will provide a status for the rate design and program-related elements of those

commitments. Commitments related to specific proposals made in my testimony are addressed within their respective sections. Company witness Graham Jaynes also offers testimony concerning a number of proposals aligned with rate design-related commitments.

Q: Please detail the specific rate design-related commitments from the October 2, 2024, Stipulation and what is their status?

A: The following commitments were part of the October Stipulation & Agreement. For each, I will list the commitment and offer a brief status update.

> *8. Consolidation: The Company agrees to open a new Commission non-contested docket dedicated to reviewing the consolidation of Evergy Missouri Metro and EMW. As part of this new docket, the Company agrees to participate in at least three workshops that will occur once each quarter starting second quarter of 2025. Each workshop will entail the Company updating the Commission, Staff, OPC, and other stakeholders as to the progress it has made up to that point on consolidation of EMW and Evergy Missouri Metro.*
>
> *The Company will identify deliverables and provide consolidation milestones and estimated timeframes for each item identified in these workshops and will respond to questions and seek input from the Commission and stakeholders. At the conclusion of each workshop, the Company will file a report that (1) details the information provided during the workshop and (2) answers questions left outstanding during the workshop in the docket opened pursuant to this provision.*
>
> *Prior to the first of these workshops, the Company agrees to request an on the record presentation to present what it considers to be the most important consolidation issues that need to 5 be addressed and to solicit initial input from the Commission and interested stakeholders. Within three months of the final workshop, the Company will again request an on the record presentation to present all identified potential consolidation options. The Company will then file in the docket created pursuant to this provision a final report that details all the information provided in the final on the*

record presentation along with all supporting information, including necessary workpapers, supporting the Company's report.

Complete. The provisions of this commitment have been completed. Three workshops and an on-the-record presentation have been held, with details memorialized under Case No. EW-2025-0220.

9. TOU: The Signatories agree as follows:

a. EMW will move $61,403 from TOU education to be recovered under the Thermostat program (non-incentive) budget in the next EMW MEEIA DSIM Rider filing.

1. Any additional customer education, marketing, or other materials that promote MEEIA-related activity will be reasonably allocated to the relevant MEEIA non-incentive budget.

b. EMW will not seek recovery of $500,000 of its requested TOU education expense through June 30, 2024. Signatories agree that recovery of costs for ongoing annual TOU education expense is reflected in the global settlement agreement.

c. Deferral of default TOU customer education will cease September 30, 2024 with final invoices received by December 31, 2024, for services performed through September 30, 2024.

d. As part of its continued TOU education campaign the Company agrees to emphasize messaging designed to explain the fundamental purpose behind TOU rates. In addition, the Company, Staff, and the OPC agree to work collaboratively on developing this messaging, and, where reasonably possible, the Company will solicit feedback on prospective TOU education material from Staff, and the OPC prior to the messaging being presented to customers.

Complete. The provisions of this commitment have been completed. All three TOU Education stipulation items have been successfully addressed. Issues 9.a and 9.b were resolved through completed journal entries. Issue 9.c required no corrective action, with

confirmation that invoices and marketing costs were handled appropriately and updated procedures were implemented beginning in 2025.

10. TOU for Net Metering Customers & Related Customer Education:

a. EMW shall implement Company method with tariff changes made in this case and billing capabilities to be completed with the effective date of rates. Staff does not agree with this approach, but due to the other parties having reached an agreement, Staff does not oppose its inclusion for the purposes of settlement.

1. EMW will modify its proposed tariff, replacing paragraph C with the following:

If the electricity generated by the Customer-Generator exceeds the electricity supplied by the Company during a given TOU period, the Customer-Generator shall be billed for the appropriate Customer charges for that billing period in accordance with the Company Obligations section of this tariff and shall be credited for the excess kilowatt-hours generated during the TOU period at the rate identified in Schedule Cogeneration Purchase, Sheet 102 in the following billing period. This rate is calculated from the Company's avoided fuel cost.

b. EMW shall host website content on www.evergy.com to educate customers regarding net metering and time-based billing, to be available no later than February 1, 2025.

c. EMW shall provide support to net metering customers to evaluate rate options which may include a spreadsheet-like tool or similar mechanism for trained Company Staff to assist net metering customers in rate selection.

d. EMW shall inform current net metering customers of the availability of TOU rate plans and the website content after February 1, 2025, and before

April 1, 2025, at a 7 cost not to exceed $20,000. The Company will share the communication with Signatories in advance of sending to customers.

Complete. The provisions of this commitment have been completed. Website deployment, stakeholder notification, and customer communication requirements were completed on schedule. The program website was made available online before February 1, 2025.

An email containing the website link was sent to all signatories on January 31, 2025. Customer communications were prepared and shared, including copies of customer letters. Customer letters were sent via USPS, with one mailing occurring in mid-February 2025 and another prior to April 1, 2025.

11. AMI Opt-Out: The Signatories agree that the Non-Standard Meter Initial Setup Charge ("AMI opt-out charge") remains $150. Company will incorporate a self-read option. The Company will confirm self-reads at the beginning/end of summer billing months twice annually. If the number of AMI opt-outs rises to 200 customers, then Signatories agree to reassess the self-read option and/or the Company can request a variance from this Agreement. The Company agrees to notify existing opt out customers of this option and provide the OPC information on the rate of self-reporting adoption by the end of calendar year 2024.

Complete. The provisions of this commitment were completed but then changed by the passage of Senate Bill 4 establishing section 386.820, RSMo and the subsequent Commission rulemaking that established 20 CSR 4240-10.035. The Company filed revisions to its General Rules and Regulations to comply with these provisions on May 15, 2026, under JE-2026-0139.

12. Customer Complaint Reporting Requirements: Following the approval of this Agreement, EMW agrees to track and maintain records of all escalated customer calls it receives. The records for each call shall be retained for a period of not less than two years and the Company agrees to provide that data to Staff and the OPC upon request. The Company agrees

to separate the customer escalated call data by EMW and Evergy Missouri Metro.

Complete. The provisions of this commitment have been completed and available upon request.

13. Reporting: The Company will add average handle time ("AHT") and self-service system outages to its quarterly reporting to Customer Experience Division ("CXD"), unless parties participating in the CXD meetings agree to modify this reporting.

Complete. The provisions of this commitment have been completed and available upon request.

17. Right of Way: The Company shall provide Staff an Evergy guidelines memo that updates the document entitled Transmission Engineering Policy Road Right-of-Way previously provided in discovery in this case. This memo will clearly specify that Evergy's practice shall be to first look at installing facilities in the highway ROW while considering other relevant siting factors. The updated memo will be provided within three months of the effective date of rates in this case.

Complete. The provisions of this commitment have been completed and were emailed to Staff/Parties in March 2025.

22. Revenues to Discuss The Company shall provide Staff actual, rate code level, residential TOU billing determinants for January 1, 2024, through December 31, 2024, by May 1, 2025, or the Company's next general rate case, whichever is earlier.

Complete. The provisions of this commitment were emailed to Staff by May 2025.

23. Future Margin Rate Direct Testimony EMW shall provide net margin rate calculations, as applicable, in any future rate case, in operable spreadsheets, explained in its direct testimony.

Complete. The provisions of this commitment are being covered in this case, ER-2027-0077.

24. Distribution Costs The Company will hold at least three meetings by September 30, 2025, with Staff, OPC, and Company Field Design and/or Engineering personnel to discuss Company processes and the data available related to distribution infrastructure, distribution expenses, and

the internal accounting and other bookkeeping of these items, which may involve additional company personnel.

Complete. The provisions of this commitment were completed. Meetings were held on April 3, 2025, August 19, 2025, and November 13, 2025. The third meeting date was requested by Staff due to personnel availability.

2. Rate Design Strategy

Q: Please describe the strategy guiding the rate design proposals offered in this filing.

A: The Company continues to follow the general guidance offered by the Rate Modernization strategy formulated in 2022 and has recently chosen to focus on jurisdictional alignment and large load integration. The rate design proposals offered in this case are aligned with proposals and commitments made in the 2024 EMW rate case, Case No. ER-2024-0189, and influenced by the recent EMM rate case, Case No. ER-2026-0143.

Q: How does the Rate Modernization strategy guide rate design efforts in this case?

A: The Rate Modernization strategy is based on drivers that acknowledge the utility must balance many forces to increase overall customer satisfaction while recovering revenue requirements. A foundational driver has long been the principles detailed by James C. Bonbright[1]: revenue sufficiency, fair apportionment and cost causation, gradualism and rate stability, efficiency and price signals, avoidance of undue discrimination, and simplicity and customer acceptability. Through the rate designs executed over several rate cases and refined with changes in regulatory outcomes, industry developments, and customer desires, Evergy has sought to achieve the following rate objectives:

- Creating rates that are independent of end use requirements
- Bringing rate structures closer together across jurisdictions
- Enabling business growth

[1] Principles of Public Utility Rates, by James C. Bonbright, Albert L. Danielsen, David R. Kamerschen, March 1, 1988.

- Simplifying rates and increase pricing transparency
- Providing greater customer choice
- Increasing customer satisfaction
- Leveraging Customer Information System ("CIS") and Advanced Meter Infrastructure ("AMI") investments
- Developing price signals to increase grid efficiency

Although originally established in 2022, these objectives remain valuable to guide our rate design efforts.

Q: Has progress been made under these objectives?

A: Yes. Evergy has made continued progress to align tariffs between the EMW and EMM jurisdictions, supporting common operations within Missouri. Within the residential class, Commission orders to institute Time of Use ("TOU") rate designs accelerated steps to align these rates. Additionally, multiple programs have been established across jurisdictions to provide customers with direct access to renewable energy. In the 2024 EMW rate case, initial steps were completed to achieve alignment of the non-residential rate structures to the Company target structure. In the recent EMM rate case, ER-2026-0143, further steps were taken to align with EMW and the Company target structure. This case will be used to complete the additional steps to align considerably with the Company target structure.

Q: Why is jurisdictional alignment important?

A: Jurisdictional consolidation has long been a component of our rate design strategy but became a formal issue in the 2024 EMW rate case with the establishment of Case No. EW-2025-0220 and the completion of the associated workshops and on the record presentations.

The Company has been clear since the 2018 merger of Great Plains Energy and Westar Energy that consolidation should be evaluated and pursued. Since then, Evergy has taken deliberate steps toward consolidation, and will continue to develop and execute reasonable and appropriate consolidation plans. A preliminary rate consolidation plan was

developed and filed with the Commission in 2020[2] and Evergy has continued to execute on that plan ever since. Current Evergy efforts are focused on two primary goals, to achieve:

- Legal Entity Consolidation: Merging of corporate units within a holding company structure with consolidation of operating companies

- Rate Jurisdiction Consolidation: Refers to consolidation of rates and revenue requirements across jurisdictions

My focus and the focus of the rate design proposals offered in this case is to support Rate Jurisdiction Consolidation.

Q: Why is rate consolidation important?

A: There are a number of reasons why rate consolidation is important. Rate Consolidation will,

- Simplify and enhance customer experience
- Streamline Company operations such as billing and customer support
- Simplify regulatory processes
- Support legal consolidation

Simply put, rates and rate structures are a foundational aspect of how customers interact with their utility. Steps taken to make rates and rate structures consistent will provide clear benefit and support to how Evergy provides service to its customers.

Q: What are the general steps expected to achieve rate consolidation?

A: Evergy has identified three steps to achieve rate consolidation,

- Step 1: Rate Structure Consolidation: refers to the consolidation of line items on a customer's bill (i.e., the line items across consolidated jurisdictions will be identical

[2] See *Notice of Filing Consolidation Study*, File No. ER-2018-0145/0146 (filed October 30, 2020).

and measured the same way). While line items on customers' bills align, actual prices customers pay between jurisdictions may continue to be different.

- Step 2: Revenue Requirement Consolidation: combined revenue requirement as a common target to establish consolidated rates, requiring separate and combined cost of service studies.

- Step 3: Price Consolidation: of rate jurisdiction consolidation refers to the actual rate that customers pay being aligned across jurisdictions.

Evergy is within Step 1, and proposals made in this case further support structural alignment between EMW and EMM.

Q: How does Evergy plan to achieve structural alignment?

A: Evergy has established a desired target structure for the residential and non-residential rates and has identified steps for the EMM and EMW jurisdictions to make progressive movement toward these target structures in the respective rate cases. If successful within these respective cases, the rate structures will be sufficiently aligned to move to step 2, and step 3, the revenue requirement and price consolidation steps.

For the residential rates, the current TOU options and Standard Tiered rate represent the target structures, and the Missouri jurisdictions are largely aligned now. For the most widely used non-residential rates, Evergy has identified the four-part rate structure used at EMM, revised to remove the Hours-Use energy charge, as the target structure. For lighting, the current Municipal Streetlighting, Unmetered Private Area Lighting, and Off-Peak Lighting tariffs are largely aligned now with continued clean-up of legacy lighting types expected to complete the alignment.

Q: How did the Company approach preparations for this case?

A: As mentioned previously, the Company had multiple commitments and outcomes from ER-2024-0189 to guide our rate design plans. The Company was also mindful of the ER-

2026-0143 rate case and although an Order has not been issued in that case, details from that case have informed our plans.

Similar to steps taken in the ER-2026-0143 case, steps have taken by the Company to incorporate Large Load elements in the direct filing. Despite having no customers in the test year, transitional steps were taken in the preparation of revenues and CCOS studies to acknowledge this developing customer segment. In general, the Company maintained a holistic perspective in preparing this case and is hopeful these steps are helpful now and in future cases.

Q: What are the Company rate design proposals for this case?

A: The Company is making a series of proposals with most directed toward the non-residential customer classes. Each of these proposals were identified in the Unanimous Stipulation and Agreement in ER-2024-0189. The proposed rate design changes include the following,

- Elimination of Annual Base Demand ("ABD") structures – At the conclusion of the last EMW rate case, the Base and Seasonal structures of the ABD structure remained in the non-Residential rates although the pricing was set to minimize the effects. The Company proposes to remove those remaining ABD structures and rely solely on the seasonal pricing differentials to address seasonality in the non-residential rate designs.
- Facilities and Customer Charges – As informed by the Company CCOS, the Company proposes to set the Facilities and Customer Charges based on cost, while recognizing the generally accepted relationships between the service voltages.
- Demand Thresholds – Within the Company's current rates and rate classes, the designs include minimum demand values to differentiate the rate pricing between

customer classes, but customers are free to choose any rate for service. As a result, customers intentionally or unintentionally select rates that are not optimal for their load condition and will have materially different loads as compared to other customers in a given class. This practice becomes problematic when rate design changes are applied to a class as the impacts for these "misplaced" customers can be materially different than a typical customer for that class. The Company is proposing demand-based thresholds, referred to as "Bright Lines," to limit customers to the respective classes based on their demand usage. This approach has been utilized successfully in the Evergy Kansas Central jurisdiction, and we expect it will be approved for EMM. We believe these thresholds will be useful in the future as we seek to align rate classes between EMM and EMW. It is important to point out that as part of this proposal the Company is creating a Medium General Service class. EMW has not had such a class, and in order to support future consolidation, we have proposed adding that class now.

- Hours-Use Replacement – Hours-Use pricing is a ratemaking technique that seeks to recognize the relationship between demand and energy consumption within the energy rate component. Essentially, the method identifies efficient energy use and rewards more efficient users with a lower price per kWh of usage. Although considered an economic means of energy pricing, since the elements of the Hours-Use calculation are not known until the bill is calculated, a customer cannot anticipate the pricing associated with their energy use. This makes it difficult for customers to take proactive action concerning their consumption. The Hours-Use structure is being considered for change because of feedback received from

customers seeking a clearer view of their energy pricing. Within this case, the Company is proposing to replace the Hours-Use structure with flat kWh pricing that includes a peak period adder and an off-peak credit, similar in structure to the residential Peak Adjustment rate. The proposed design will also include provisions for an on-peak demand charge, moving away from the non-coincident peak method used currently.

- Optional TOU Rate – The proposed optional TOU rate is a three-period, four-part TOU rate that will be available to non-residential customers. The four-part design consists of a customer charge, facilities charge, on-peak demand charge, and energy charge. The energy charge is in the form of a three-period design with an "on-peak" period from 3 pm to 7 pm on non-holiday weekdays in summer months, a "super-off-peak" period from midnight to 6 am every day throughout the year, and an "off peak" period for all other hours of the year.

Please see the Direct Testimony of Company witness Graham Jaynes for details about the application of these proposals to the tariffs as well as details concerning other rate design proposals.

Q: Are these proposals intended to support rate consolidation?

A: Yes. Collectively, if approved, these changes would provide another major step to alignment of the EMM and EMW rate structures. Proposals, such as the demand thresholds, Hours-use replacement, and optional non-residential TOU, are changes EMW committed to make in this rate case and align with structures proposed and awaiting final order for EMM.

Q: Will the EMM and EMW rate structures be aligned if these proposals are approved?

A: No, but they will be very close to alignment. Additional steps will likely be required to refine the structure into final alignment. If any proposals are rejected or other proposals approved that were unanticipated, some further adjustment may be needed to be accommodated. This includes adjusting to accommodate any unexpected outcomes from the Commission order for the last EMM rate case.

3. Customer Rate Design Education

Q: Does the Company plan to offer Customer Education as part of the proposed non-Residential rate design proposals?

A: Yes. It is common for the Company to help customers understand their rates for service and assist them in making choices about their energy use. This support is particularly important following a rate case where the rate structures and pricing are subject to change.

Q: Has the Company fully developed an education plan for use in this case?

A: No. The Company 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.

Q: Given this uncertainty, can you describe how this education plan would be developed?

A: 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. In either scenario, the Company has considerable experience and success in implementing rate changes and is prepared to establish detailed customer education plans when it judges the timing is right to expend this effort. I would characterize our status at the time of direct testimony filing as having a framework to guide our efforts and a team of communications professionals ready to execute.

Q: Please describe this framework.

A: Based on prior rate implementations it is reasonable to expect the customer education plans will include the following elements,

- 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
- Training of Company representatives and Customer Support personnel

Q: Are the communications professionals the key to the education plans' success?

A: Absolutely. The Evergy Communications team has proven themselves time after time. Of particular note was the success of customer education following the residential TOU rate implementations in 2023-2024. I have confidence that this Team and our Customer-Support personnel are able and ready to support customers with this education.

4. Lighting Tariff Modifications

Q: Please describe your testimony concerning Lighting.

A: The Company is proposing minimal changes beyond pricing changes for the Lighting class. Changes ordered and implemented as part of the ER-2024-0189 rate case have the Lighting rates well positioned relative to the target structures for lighting. The target structures are comprised of the current Municipal Streetlighting, Unmetered Private Area Lighting, and

Off-Peak Lighting tariffs. Changes proposed for this case will consist of continued clean-up. My testimony will complement the testimony of Company witness Graham Jaynes who addresses the pricing changes.

Q: Are there any aspects of the pricing change you wish to discuss?

A: Yes. The Company proposes continuing its transitional pricing for the LED options in the Municipal Streetlighting tariff schedule. In 2017, the Company began to convert Municipal Street Lighting to LED technology. Rates for the LED luminaires were set based on costs, but the rates for non-LED fixtures were pre-existing and often lower than the observed costs. To facilitate the conversion and avoid additional bill impacts, rates for non-LED fixtures were left as they were. Since the conversion is complete, the Company is looking to give the Full Light Assembly Transitional LED prices a larger increase in order to eventually consolidate this with the standard Full Light Assembly LED prices so that customers receiving the same service will be paying the same rate. On the Municipal Street Lighting Service tariff, Sheet No. 150, under section 1.0 of the RATE section, we have a series of LED rates coded as OWB. These rates were set as part of the LED conversion and were intended to be temporary. These rates would be gradually increased over time and brought to parity with the regular LED rates under section 1.0 and coded as OWA. For this case, we propose eliminating the current differential between the OWB and OWA rate. If approved, steps will be taken in a future rate case to consolidate the two variants and end the transitional pricing.

Q: Is the Company proposing any change or clean-up for the Lighting schedules?

A: Yes. I propose a change to the layout of the Private Unmetered LED Lighting Service tariff, Schedule PL, Sheet 152, adopting a table format similar to the one implemented for

Municipal Streetlighting Service, Schedule ML in ER-2024-0189. We believe the table layout is easier to read and improves the visual presentation of the tariff. In conjunction with the layout change, I propose adding a rate class code, implementing Lumen Output Ranges, and updating the Monthly kWh to reflect increased efficiencies for the LED lighting options. The rate code is a recent change, first initiated within the Municipal Street Lighting Schedules, which provides a handy reference code to use in our internal systems and facilitates easier identification of the lighting options. For the lumen ranges, the current Schedule PL tariff details a ±12% range for lumens related to the lighting options. The proposed presentation does the calculation to offer customers minimum and maximum values for the lumen output. Concerning the Monthly kWh presented on the Lighting Schedules, it is our practice to update these values with each rate case to reflect efficiency improvement in the LED technology. The kWh reductions ranged from 1 kWh per month to 30 kWh per month.

5. Rules & Regulations Modifications

Q: What changes are proposed for the EMW Rules & Regulations?

A: The Company is proposing a number of revisions to continue the jurisdictional alignment of its General Rules & Regulations ("Rules"). These revisions will build on the comprehensive revision and creation of Book #3 proposed for EMM in ER-2026-0143. As of the date of this testimony, the Rules revision was incorporated in multiple settlements, but no Commission Order has been made. Presuming the Commission Order will support the Book #3 adoption, the Company is proposing further alignment edits for the EMW Rules.

Q: Please summarize the changes proposed for EMM Book #3.

A: EMM proposed a comprehensive update to the format and layout of its Rules, changing the sections and section numbering. The content of the sections was revised to establish terms that will be largely aligned with the language in place at EMW adjusted to retain important EMM content and details. Book #3 revisions also contained material revisions, addressing a number of sections. These material revisions will be repeated here for EMW and will be discussed again later in this section. Finally, the Book #3 version of the Rules was inclusive of edits and corrections supported by Staff in that rate case and included in an error log.

Q: Since the EMM Rules proposed for Book #3 were modeled off of the EMW Rules, why are further alignment edits needed?

A: The EMW Rules served as the basis, but the Rules were modified in a number of ways that now require us to execute additional revision to bring the EMW Rules in line with the EMM Book #3.

Overall Structure and Major Terms

Q: Please describe the structural changes proposed for the Rules & Regulations?

A: The Rules for EMW are changed mainly to incorporate a new section or rename an existing section. Otherwise, the EMW Rules are structured consistently with the proposed EMM Book #3. The following table, Table 1, identifies the current and proposed presentation of the EMW Rules. The green highlight identifies new or relocated sections.

Table 1

Proposed Rules		
Rule Section	**Current EMW Content**	**Proposed EMW Content**
Section 1	Definitions	Definitions
Section 2	Service Agreements	Service Agreements
Section 3	Supplying and Taking of Service	Supplying and Taking of Service
Section 4	Installations	Installations
Section 5	Metering	Metering
Section 6	Meter Reading, Billing, and Complaint Procedures	Meter Reading, Billing, and Complaint Procedures
Section 7	Extension of Electric Facilities	Extension of Electric Facilities
Section 8	Emergency Energy Conservation Plan	Grid Interconnection, Operation and Access Policy
Section 9	Promotional Practices	Emergency Energy Conservation Plan
Section 10	Missouri Energy Efficiency Investment Act Programs - Cycle 3	Customer Support Programs
Section 11	Compliance with Rules and Regulations	Compliance with Rules and Regulations
Section 12	Summary of Types and Amounts of Charges Allowed	Summary of Types and Amounts of Charges Allowed
Section 13	*Reserved*	*Reserved*
Section 14	Municipal Street Lighting Service	Municipal Street Lighting Service
Section 15	Missouri Energy Efficiency Investment Act Programs - Cycle 2	Missouri Energy Efficiency Investment Act Programs - Cycle 4

Q: Are there material revisions that should be explained in more detail?

A: Yes, the following revisions are considered material or represent new language proposed for inclusion to the Rules & Regulations, and I will speak to each.

- Convert Promotional Practices to Customer Support Programs
- Expansion of the Definitions Schedule
- Creation of Grid Interconnection Policy Section
- Revised terms for Multiple-Occupancy & Redistribution

- Modification to Choice and Application of Rates
- Other Rule Changes

Promotional Practices Conversion to Customer Support Programs

Q: Please describe what content is currently contained in the Promotional Practices section?

A: The Company currently places the Income Eligible Weatherization, Economic Relief Pilot Program, and Solar Photovoltaic Rebate Program in this section. There are also legacy rules concerning Fuel Cost Comparisons, Equipment Selection, and Energy Consulting.

Q: Please describe the revision to Promotional Practices?

A: The Company is proposing to rename this Section to "Customer Support Programs," retaining the rules and programs previously in this section. Within this new Customer Support Programs section, the Company will also retain all non-MEEIA customer programs, including Rehousing Low-Income Pilot Program and Critical Needs Program.

Q: Is the Promotional Practices designation still needed?

A: No, not within the new proposed Rules. The Code of State Regulations ("CSR") defines Promotional Practices as,

> *any consideration offered or granted by a public utility or its affiliate to any person for the purpose, express or implied, of inducing the person to select and use the service or use additional service of the utility or to select or install any appliance or equipment designed to use the utility service, or for the purpose of influencing the person's choice or specification of the efficiency characteristics of appliances, equipment, buildings, utilization patterns or operating procedures.*[3]

None of the programs reflected in the Company Rules meets this definition, so the Company will take this opportunity to remove the heading from use.

[3] 20 CSR 4240-14.010 General Provisions, paragraph (6)(L).

Q: Why is this change needed?

A: This change will resolve some placement inconsistencies and will align like programs under a new, more appropriate header. As the sections are labeled and tariff placed now, there is potential for creating customer confusion.

Definitions

Q: Please describe the revision to the Definitions Schedule?

A: The layout and content of definitions in the EMW tariff will be made largely consistent with the definitions proposed for the EMM Book #3. Fifteen definitions listed in the EMM Book #3 version are proposed for adoption in the EMW tariffs. Specifically, definitions for the following terms are added to the EMW Rules Definitions Section.

- Billing error
- Building
- Customer's Installation
- Electric Service
- Fraud
- Individual Liability
- Meter Error
- Meter Installation
- Payment Agreement
- Point of Delivery
- Responsible Party
- Service Agreement
- Service Territory
- Tampering
- Time of Application

The Company also proposes deleting three definitions not used in the EMM Book #3 version and deemed not needed here for EMW. Those deleted definitions are,

- Extension Agreement
- Residential Service
- Settlement Agreement

Other, more material Rules changes are detailed this the remaining part of this section. Unless stated otherwise, the Rule change and the support for the change is the same as offered in ER-2026-0143 for EMM.

Q: Will the EMW proposed Rule be inclusive of the revisions identified in the ER-2026-0143 Stipulations?

A: Yes. The proposed EMW Rules are reflective of the error log revisions detailed in ER-2026-0143 and all other Rule-related edit detailed in that case.

Q: Will the EMW and EMM Rules be aligned if the Company proposed changes are accepted?

A: Substantially yes. Some additional refinement will be needed to achieve perfect alignment, but the Rules will be well positioned for future jurisdictional alignment.

Grid Interconnection Policy

Q: Please describe the proposed Grid Interconnection, Operation, and Access Policy?

A: Consistent with its proposal for EMM, the Company is proposing to establish a distinct section of its Rules to address interconnection. This section, Section 8, will contain all interconnection-related terms present in the current General Rules & Regulations and provide a structure for future terms as this element of service to customers continues to develop.

Q: Why is this change needed?

A: When many of the current Rules & Regulations were established in the past, interconnection of customer generation was a rare occurrence. Now it is common to have customer generation at all levels of customer, rooftop solar on a residential customer premise all the way to utility scale generation used in a cogeneration context. This distinct

policy section will help support customer interaction and understanding of roles and responsibilities under interconnection. We believe that ultimately, this will support the growing utilization of customer generation.

Q: Beyond the relocation of existing rules to this Section, does the Company propose any revision or addition of new terms?

A: Yes, other changes are proposed. First, definitions will be established to align understanding of new terms being used around customer generation. Next, the Company proposes adding detail around the applicable codes, statutory and administrative regulations, and Company interconnection standards within this new Section. Many of these details are preexisting but have not been concisely delineated in the General Rules & Regulations before now. The Company proposes devoting a portion of this new section to Grid Service Participation, the requirements developing at the FERC and RTO level to address customer participation in the energy markets. Much is yet to be resolved in this area, so the steps taken now are intended to establish a framework that can expand as details are formalized. Finally, the Company proposes correcting the rate defined for interconnection studies for systems larger than 5MW. The current pricing is a base amount plus $1 per kW. The pricing should be $0.10 per kW. This error was discovered recently and was identified as an inadvertent mistake. Since this language was approved, it has been our practice to bill customers the base plus $0.10 per kW amount. This revision will align the tariff with the intended pricing.

Q: Does this proposed section create any additional restrictions on customer generation interconnection?

A: No. All interconnection requirements remain unchanged. Within the Grid Service Participation section, new terms will define roles and responsibilities and basic terms governing the interactions of the Company and the customer.

Multiple-Occupancy & Redistribution

Q: Please describe the Company's Rules on Multiple-Occupancy & Redistribution.

A: The Company's basic metering rules require individual metering for each customer.[4] However, other rules establish provisions that will allow for redistribution.[5] Specific to multiple-occupancy buildings, the Company may allow redistribution where the operation of certain types of multiple occupancy premises, either in whole or in part, makes it impractical for the Company, in its judgment, to separately meter and supply electric service to each occupant as a Customer of the Company. Such exceptions may include:

- An operation catering predominately to transients, such as hotels, motels, and hospitals;
- An operation where the individual dwelling quarters are not equipped with kitchen and bathroom facilities, such as recognized rooming houses, dormitories, old folk's homes, orphanages, and eleemosynary institutions;
- An operation of a building used essentially for general office or commercial purposes where the separate premises leased to office or commercial tenants are adjustable and subject to rearrangement or relocation;
- An operation of a transient mobile home court where electric service is supplied by the Company to the operator, as the Customer of the Company, pursuant to an applicable rule or rate schedule of the Company.

[4] General Rules and Regulations, Section 5.01, Meter Installations, Sheet R-31.

[5] General Rules and Regulations, Section 5.02 (b), Resale and Redistribution, Sheet R-32.1 "*Redistribution means the furnishing of electric service by the Customer (i) to another building occupied by the Customer and located on the same premises of the Customer but used by the Customer for a separate business enterprise, or (ii) to separate premises occupied by another person, whether or not such premises are owned, leased or controlled by the Customer, without making a specific or separate charge for the electric service so furnished*"

Recently, other types of customers have requested the ability to redistribute in other situations, relying on exemptions provided for in the CSR.[6] In these situations, the customer has relied on age of the building, historic elements, or other factors to receive approval for redistribution.[7] These cases highlighted a need to update the Company Rules and better align with the role of the Variance Committee also defined within the CSR[8].

Q: What is the purpose of the proposed change to these rules?

A: In general, the Company seeks to establish improved and updated definitions of the terms around redistribution. These improved terms will allow more consistent and transparent administration of redistribution requests. These revisions should also provide a clear handoff to the Variance Committee and the authority it has under the CSR.

Q: What changes are proposed?

A: The Company is proposing a number of revisions and new language to effectuate this update. I will speak to them in sequential order as they appear in the Rules.

- Proof of rent inclusion – The Company proposes to add the following language to section 5.02,

> If requested by the Company, the owner, lessee, or operator of such multiple occupancy premises where redistribution is permitted shall provide evidence of the rent inclusion. If the rent inclusion fails to meet the terms of this section the owner, lessee, or operator of such multiple occupancy premises where redistribution is permitted shall implement suitable such rent inclusion immediately.

This language will establish an expectation for the Customer that rent inclusion is important and must be substantiated. The Company

[6] See 20 CSR 4240-20.050 Individual Electric Meters - When Required found at: https://www.sos.mo.gov/CMSImages/AdRules/csr/current/20csr/20c4240-20.pdf. Exemptions are found in paragraph (4).
[7] Case No. EE-2025-0158 and EE-2024-0335
[8] 20 CSR 4240-20.050 (5)(C)

currently has limited authority to monitor this important requirement.

- Expanded terms for Renovation – The Company proposes to add new and updated language detailing the role of renovation of any building in determining the applicability for redistribution. Specifically adding,

> Where a building presently receiving electric service through a single meter, regardless of building age, undergoes renovation to the extent that the cost of such renovation is fifty percent or more of the value of the building, then the building shall not be eligible for redistribution. When redistribution is requested and before receiving permanent service, the Customer shall provide the Company with an estimated cost of renovation and a current estimate of building value. Should such information not be available or is deemed unreliable by the Company, the Company shall exercise reasonable judgment to determine if renovation could reasonably support individual metering.

The threshold of fifty percent or more of the value of the building is not new. The application of this threshold has been clarified.

- Adding terms for Change of Ownership – The Company proposes to add new language to address ownership changes. Specifically adding,

> Should a building presently receiving electric service for redistribution change ownership, redistribution will only be allowed if the end use and purpose of the building remains consistent with the conditions supporting the original approval of redistribution. Should the end use and purpose of the building change, the Company shall evaluate if the building qualifies for redistribution based on its current conditions.

The Rules are currently silent on this detail.

- Adding terms detailing Considerations – The Company proposes to add new language detailing the context and key elements that underlie the Company consideration of redistribution. Specifically adding,

> In determining if redistribution will be allowed, the Company shall assess the request in the context of all factors impacting the electric

service. Presence of mixed residential/non-residential loads, variations in end use, customer generation, or sizable public service load (see section 5.02 (F)) are detrimental to approval for redistribution. Cost or project delay to provide individual metering shall not be a factor in the decision to allow redistribution. The utilization of renewable energy resources shall not automatically allow redistribution.

- Adding terms to describe Variances – The Company proposes to add new language detailing the process to seek a variance. Specifically adding,

> Should the Company deny a request for redistribution, the requestor may seek a variance from this Rule and Commission Rule 4 CSR 4240-20.050(5). Approved variances are recorded in section 14 of the Company Rules and Regulations.

Q: What will be the collective effect of these revisions?

A: If these revisions are approved, the Company will have an improved basis to consider and make decisions about customer requests for redistribution. In my opinion, these changes will also give the Variance Committee a better context to examine and rule on variance requests should the Company deny redistribution.

Modification to Choice and Application of Rates

Q: Please describe the revision to the proposed modification to Choice and Application of Rates.

A: With the proposal to add demand thresholds, the Company needs to modify its terms for Choice and Application of Rate. Specifically, the current Rules specify that the selection of the rate schedule is the responsibility of the Customer. Under the demand threshold proposal, the Company wishes to assist customers by proactively changing customer rate schedules in response to observed usage. The Company proposes new language to support this proposal. Further, the Company recently made changes to its residential tariffs to allow

rate choice as part of a filing to allow opt-out from the residential TOU rates.[9] Additional edits were made to this section of the Rules to align with those accommodations.

Q: What language does the Company propose to add?

A: The Company proposes to include the following as part of section 6.03, found on sheet R-35 of the proposed Rules with the following,

> C. Company may change customer's rate schedule and/or rider if Company discovers customer's Electric Service is no longer eligible for the rate schedule and/or rider under which customer is taking Electric Service. Company may reissue bills under the appropriate rate schedule for Electric Service taken under the prior rate schedule. Reissued bills shall cover only that portion of the previous 12-month period during which customer received Electric Service under the incorrect rate schedule and/or rider.

This language is similar to language used in the Evergy Kansas Central Rules where demand thresholds are already in place.[10] Subparagraph C is intended to guide the administration of the demand thresholds. The Company believes it is important for the Customer to retain primary responsibility for selecting their rate schedule and believes this additional language will help clarify the context for Company actions.

To accommodate residential rate choice, the revisions to Section 6.03 are more extensive. The primary subparagraph capturing this provision is subparagraph B, specifically,

> B. If a customer is eligible to take electric service under more than one (1) rate tariff, the choice of such rate tariff lies with the customer. Any customer shall pay for service under the applicable rate tariff for all electrical power and energy used. Residential Customers may substitute any other applicable rate schedule by notifying Company. Non-residential Customers may change rates only once in any 12-month period unless, in Company's reasonable discretion, there is a substantial change in

[9] ET-2026-0074, Tracking Nos. JE-2026-0081 JE-2026-0082, *In the Matter of the Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Approval of New or Modified Tariffs to Permit Customers to Opt-Out of Time of Use Rates*

[10] Evergy Kansas Central General Rules and Regulations, Section 2.04

customer's use of Electric Service during such period. In that event, Company may allow customer to change rate schedule and/or rider. All Customer rate changes shall take effect after the date of the next meter reading after notice to Company.

This language is particularly important for residential customers to help guide selection of the optional rates available to them and achieve alignment with the flexibilities ordered by the Commission in ET-2026-0074.

Other Rule Changes

Q: Are there any proposed Rule revisions unique to this case?

A: Yes, the Company is proposing a number of revisions for the EMW Rules. Some are unique to the EMW Rules and others will be proposed for addition to the EMM Rules in a future rate case or separate filing. For this filing, I will provide a brief description of each.

- Loss Factors – The Company proposes to add metering loss factors that will define the relationship between the metering point and the customers service voltage. The loss factors will help support operational flexibility for metering. Similar loss factors are in place for the EMM C&I rates, and the terms reside in the respective rate tariffs. For EMW, I propose adding the loss factors to Section 5, METERING section, specifically a new Section 5.06. The loss factors are set to align with the loss factors offered in this rate case for the Fuel Adjustment Clause and supported by Company witness Linda Nunn.

- Regulatory Authorities - The Company proposes adding specific language to Section 11 of the proposed Rules to address the authority of the Company tariffs and to offer specific terms to address relationships to other authorities. The Company proposes to use language largely similar to language used by Ameren Missouri. If approved for EMW, the Company would plan to propose a similar addition for EMM.

- Point of Delivery – Within the definition of "Point of Delivery," the Company proposes to add the phrase, "Company Electric Service Standards and Construction Standards found on www.evergy.com provide specific guidance concerning the point of delivery." This addition will offer customers specific guidance on how to understand and apply the definition. If approved for EMW, the Company would plan to propose a similar addition for EMM.

- Temporary vs. Construction Power – In Section 7, Extension of Electric Facilities, the current definition of Temporary Service includes a reference to construction

power that was not present in EMM. The Company proposes deleting this reference and aligning this definition with the language used for EMM Book #3.

6. Class Cost of Service

Q: Please describe your testimony concerning the Class Cost of Service Study.

A: My testimony will provide the context for new allocations used in this study and explain the transitional steps taken to incorporate Large Load into the study.

Q: What new allocations are being used within the CCOS study?

A: With this filing, the Company is executing commitments made in the EMW rate case, File No. ER-2024-0189. Specifically, the Stipulation states,

> *"h. The Company shall include the three phase/single phase distribution approach described by MECG, to the extent information is available and reliable, in the next rate case. This does not prohibit the Signatories from opposing this classification/allocation approach.*
>
> *i. The Company shall include a fuel allocation similar to the E8760 allocator described by MECG and based on class hourly data, to the extent information is available and reliable, in the next EMW rate case. This does not prohibit the Signatories from opposing this allocation approach."*[11]

The Company is proposing to include the three phase/single phase allocator as part of the distribution allocation performed in this study. It is notable that the same allocation was proposed in the last EMM rate case, in advance of this EMW case.

Q: What is the purpose of this allocator?

A: The allocator was originally proposed by the Missouri Energy Consumers Group ("MECG") in the Direct Testimony of Kavita Maini. There she states,

> ***"Q. Why should the single phases costs be separated out from the three-phase circuit 10 configuration within the primary distribution system?***
>
> *A. To properly assign costs to those customer classes and voltages that utilize the specific configurations. Feeders originate from substation in three-phase configuration and is distributed via separate conductors for*

[11] *Stipulation and Agreement*, Section 20, paragraph h and i, File No. ER-2024-0189 (filed October 2, 2024).

each phase. The Company's primary distribution system consists of single-phase and three-phase circuit configurations. While the costs of these configurations are included in FERC accounts 364 through 367, the Company does not currently differentiate the system costs based on single and three-phased configurations as shown in response to MECG 2.4 (see Attachment A). As a result the COSS allocates costs related to single phase primary distribution circuits to both primary voltage and secondary voltage customers, which does not follow cost causation. Failure to separate out costs associated with single versus three phase distribution circuits results in over allocating the costs to primary voltage customers due to the following:

> *1. The Company has identified that through its Mapping System that 61.4% of the Company total miles of circuits are single phase and 38.6% are three-phase (including the two-phase configuration which is used to provide a form of three-phase service). As noted by the Company, the single phase circuits are not utilized to provide service to primary customers. Therefore, the single phase circuit related costs associated with 61.4% of the Company's total miles of circuits should only be allocated to secondary voltage customers. None of these costs should be allocated to primary voltage customers.*
>
> *2. As it relates to the three-phase related configuration, the costs associated with this configuration should be allocated to secondary and primary voltage customers because as noted by the Company, the secondary voltage customers are also served by three-phased circuit configuration.*

I am particularly concerned regarding the over allocation to primary customers (and therefore, related classes such as LPS) in this case because the Company has requested $56 million in revenue requirement associated with new infrastructure related primarily to distribution equipment, which includes overhead and underground conductors and associated infrastructure that incorporates the single phase and three-phase circuits."[12]

Q: How did the Company implement this new allocation?

A: The allocation was incorporated into our processing of distribution costs. Please see the Direct Testimony of Company witness Graham Jaynes for details.

[12] Direct Testimony of Kavita Maini, p. 23, line 11, File No. ER-2024-0189.

Q: Did the Company also implement the E8760 Fuel Allocation?

A: The Company examined this allocation but did not include it in this study. The concern raised by the Company in rebuttal testimony highlighted concerns about available data. Specifically, in Company stated,

> ***"Q: Do you believe that incorporating hourly fuel costs will add additional value to the Company's fuel allocation?***
>
> *A: No, the purpose of the Company's fuel-weighted energy allocator is to reasonably allocate the monthly fuel costs relative to monthly class loads. The monthly allocator currently in place serves this purpose. Further expanding to hourly fuel costs could pose a very complex challenge for the Company from a cost and data-gathering perspective."*[13]

Q: Was the data concern raised for EMW an issue for EMM as well?

A: Yes. While the Company was able to produce hourly data to explore the allocation, several assumptions and generalization were needed. When the results were compared to the allocations produced with monthly data, minimal differences were observed. Given the allowances needed to produce the hourly results, the Company did not think it appropriate to move away from the time-tested monthly allocation method. Prior to filing in the EMM case, the Company reviewed the results with MECG and examined hourly allocation in conjunction with this EMW rate case as committed. Company witness Graham Jaynes explains the results and our decision for EMW.

Q: Please describe the steps taken to address Large Load within the CCOS study.

A: First, it is important to point out that the Large Load situation for EMW is nearly identical to the situation observe for EMM in ER-2026-0143. As of the date of this direct filing, EMW does not have a large load customer receiving service but expects to have a customer receiving Schedule LLPS minimum bills by the proposed date of the True-Up period, April

[13] Rebuttal Testimony of Craig E. Brown, page 11, line 3, File No. ER-2024-0189.

30, 2027. Given this expectation, the Company will mirror the approaches used in ER-2026-0143 to incorporate large loads into the revenues and the CCOS study. The motivation to include a Large Load revenue adjustment is discussed in the Direct Testimony of Company witness Kevin Gunn. The Revenue adjustment itself is discussed in the Direct Testimony of Company witness Graham Jaynes. Turning to the CCOS study, the Non-Unanimous Stipulation and Agreement in the Evergy Large Load Rate Plan filing case included a provision intended to address the Company treatment of revenues. Specifically,

> *"The Signatories agree that the Company will compare Schedule LLPS customer base rate kilowatt-based revenue collections under the rates in Exhibit A to this Agreement during the period utilized for evaluation for Class Cost of Service ("CCOS") Study proposed in the next general rate proceeding to base rate kilowatt-based revenue collections that would have occurred for the same customers under Schedule LPS and the difference in revenues will be identified and reallocated to non-Schedule LLPS customer classes for CCOS study purposes only in determining sufficiency of class recovery of costs of service."*[14]

In preparation of this CCOS study, the Company was mindful of these terms but recognized without an LLPS customer in the test year data, the provision could not be followed fully. Instead, the Company chose to apply the portion that could be followed and perform the class reallocation using the LLPS Revenue adjustment amount.

Q: Do you believe this approach is reasonable?

A: Yes. The reallocation of LLPS revenues is an important element of the LLPS Rate Plan, and the settlement negotiated with the parties in that case. Additionally, as described in the Direct Testimony of Company witness Kevin Gunn, although considerable uncertainty remains concerning the timing and load levels achieved by large load customers, the

[14] *Non-Unanimous Global Stipulation and Agreement,* p. 7, Section 14, paragraph i, File No. EO-2025-0154 (filed September 25, 2025).

customers are coming, and some recognition of this developing dynamic is important to consider in this CCOS study.

Q: Did the Company take any other steps within the study related to Large Load?

A: Yes. The Company recognized that part of the Construction Work in Progress ("CWIP") included in the CCOS study was identified as specific to Large Load. The McNew facility was identified in the Company Certificate of Convenience and Necessity ("CCN") case as driven by service to Large Loads.[15] Accordingly, the Company assigns this cost to the LLPS subclass. Company witness Graham Jaynes discusses this step in more detail and addresses how this assignment is further addressed in the Company's proposed rates for this case.

Q: Is the current CCOS reliable for determining the reasonableness of LLPS rates?

A: No. This 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. 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. Looking ahead, 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 evaluating the LLPS rate and maintaining compliance with Section 393.130.7, RSMo. Company witness Graham Jaynes offers more testimony detailing the applicability of the Company CCOS and the alternate versions we offer for consideration.

[15] EA-2025-0075, Direct Testimony of Cody VandeVelde, page 15, line 17, filed November 15, 2024.

Q: Please describe the alternate CCOS studies offered by the Company.

A: Consistent with the approach used in ER-2026-0143, the Company prepared two versions of its CCOS study, one based on current rates and existing customer classifications and another reflecting change to customer groupings based on the rate design proposals, mainly the revised maximum Demand Thresholds. For this case, the Company prepared an alternate version of these two studies under a materially different set of allocation methods. Specifically, the Company,

- Revised the excess component of the Average & Excess production allocator to use class non-coincident peak demands rather than class coincident peak demands.
- Revised Transmission plant to be allocated on twelve monthly coincident peaks.
- Reduced the customer component of the minimum system study by 50%, with the difference reclassified as demand-related.

These changes are focused on the Company allocation methods contested in the past by other parties. By making these changes, the Company seeks to determine if the alternate methods would produce an outcome sufficiently different to change our rate design recommendations. Company witness Graham Jaynes explores the alternate studies in detail, but in summary, the alternate allocations were directionally consistent with the Company's primary CCOS study versions.

Q: How should the Commission use the alternate CCOS studies?

A: CCOS variations are useful to support the strength of a given rate design proposal. If multiple CCOS variations support the same recommendation, like a class increase or decrease, the Commission can have more confidence that the recommendation is sound. Going forward, the Commission can examine the range of results offered by all completed studies to help reinforce confidence in rate design recommendations.

7. Service & Access Charge for Solar Subscription Service

Q: Please describe the Service & Access charge.

A: In the original design of the Solar Subscription Rider, Schedule SSP the Service & Access ("S&A") charge was set based the embedded cost of Transmission and Distribution for the Residential class based on the Company's class cost of service study from File Nos. ER-2018-0145/0146 rate cases. This charge was added to the cost of the solar resource to represent the costs of the grid. By adding it to the Solar Block charge, the Company felt that all costs for the energy of the solar resource we accounted for in the subscription pricing. Going forward, the Company expected the S&A charge would change if the costs attributed to Transmission and Distribution functions change in a subsequent rate case. The S&A charge may increase or decrease due to these provisions.

Q: What change is proposed for the S&A charge in this case?

A: No change is being proposed. A review of the costs in the Class Cost of Service prepared for this case shows the Transmission and Distribution cost to be $0.0497 per kWh.[16] The Company proposes the S&A charge remain at $0.04302 per kWh.

Q: Were any changes made to the EMM S&A charge in ER-2026-0143?

A: No changes were proposed and no parties offered objections. We expect that the EMM S&A charge will remain unchanged.

[16] The Current Class Structure version, Unit COS tab.

8. Stand-by Rate Schedule Modifications

Q: Please describe your testimony concerning the Stand-by Rate Schedule?

A: The Company proposes adding a Minimum Demand alternative to the existing Stand-by rider with an expectation of a more complete design change in the future. Specifically, the Company proposed adding the following term to the General Provisions of Schedule SSR,

> Should the Customer be unable to provide data necessary to establish the Supplemental Contract Capacity or Standby Compacity, as an alternative to the rates of this schedule, the Company will establish a minimum demand value that will be used to enable billing under the non-residential General Service Schedules, Schedule SGS, MGS, LGS, or LPS. Such minimum demand shall approximate at least 50% of the expected customer load should no customer generation be present. This minimum demand may be adjusted to maintain alignment with changes in customer load. The established minimum demand shall replace the Monthly Maximum Demand for months where the measured demand is less than the minimum demand.

Q: What is the purpose of the Schedule SSR tariff?

A: The Standby Service Rider is designed to apply specialized charges to the service of customers with behind the meter, on-site parallel distributed generation, and/or storage system(s) with a capacity of 100 kilowatts (kW) or more who rely on that generation as their primary source of power. Through the application of separate charges for supplemental service, maintenance service, and standby service as well as provisions for treatment of excess energy returned to the grid, the rider is intended to ensure correct recovery from these partial requirements customers. The current design was the result of work with the Missouri Division of Energy in File Nos. ER-2018-0145/0146 and the tariff design was agreed to in the Non-Unanimous Stipulation and Agreement concerning rate design issues dated September 25, 2018.

Q: Why is an alternative needed?

A: The Standby rate has been unused since its 2018 approval, and the complexity of the design serves as a barrier to customer understanding and to Company bill execution. In addition, the Company is receiving inquiries concerning customer generation, particularly renewable generation (solar or wind) with battery storage that appears capable of serving as the primary energy supply for that respective customer. If the Company is going to appropriately support this form of customer generation, there is a need to have a suitable rate design to properly price the service provided and make sure this arrangement does not have negative impacts on other customers.

Q: Why is this alternative appropriate?

A: Beyond operational accommodations, the primary concern arising from customers seeking to self-supply a majority of their energy needs is to ensure recovery of their cost of service. These non-residential customers expect that the Company be available to back-up their generation for those hours of the year when the customer generation is unavailable. In order to provide this backup, the Company needs to install sufficient infrastructure to serve the full load of the customer. Under traditional ratemaking, rates are set based on annual determinants and customers who intentionally avoid consumption from the Company do not pay their costs of service. In the short term, these costs are simply not recovered. In the longer term, these costs are passed to other customers for recovery. Utilization of a minimum demand establishes a reasonable method to ensure a level of cost recovery and can be accomplished easily within the current billing of customers. This identical language was agreed to with Staff and filed on October 2, 2026, as a Partial Stipulation and

Agreement – Non-C&I Rate Design in ER-2026-0143. The Partial Stipulation was not contested but was not ordered at the time of this testimony filing.

Q: What are these operational accommodations?

A: Beyond the installation of sufficient infrastructure to serve the full load of the customer mentioned previously, the Company must also retain capacity on the circuits and substation to provide the instantaneous backup these customers expect. In short, considerable accommodations are made for these customers.

Q: What changes are needed in the future to make the Standby Service Rider a viable option for customers?

A: The Company does not have a different Standby rate design in mind at this time and continues to monitor developments in the industry for guidance. It is clear that a mechanism is needed to balance the needs of these customers, support the deployment of customer generation, and protect other customers from added costs.

9. Parallel Generation Rate Schedule Modifications

Q: Please describe your testimony concerning the Parallel Generation Rate Schedule?

A: The Company proposes adding the following to the APPLICABILITY section of the tariff,

> At the time of interconnection, the Customer must be current on all billings for service and not subject to disconnection for nonpayment.

Q: What is the purpose of the Schedule PG tariff?

A: Schedule PG addressed customers with on-site generation, establishing basic term for interconnection and operation. The Schedule also establishes the billing and payment for electrical energy delivered to the Company grid.

Q: Why is this change needed?

A: The Company believes it's important that the Customer be in good standing before entering into an arrangement to receive payment from the Company for energy delivered to the grid. This revision is not intended to delay customer interconnection, but instead to ensure customers are current concerning service already received. This identical language was agreed to with Staff and filed on October 2, 2026, as a Partial Stipulation and Agreement – Non-C&I Rate Design in ER-2026-0143. The Partial Stipulation was not contested but was not ordered at the time of this testimony filing.

10. Tariff Clean-up and Miscellaneous Changes

Q: What changes and clean-up do you propose for the Company tariffs?

A: The Company proposes the following revisions for clean-up and update of its tariffs.

- Remove the Underutilized Infrastructure Rider, Schedule UIR
- Define Interval Estimation process terms and revise the related tariff
- Revise the Economic Relief Pilot Program tariff
- Revise the Rehousing Program tariff
- Remove the Residential Battery Energy Storage Pilot, Schedule RBES

Q: Why should the Underutilized Infrastructure Rider be eliminated?

A: In the EMM rate case, ER-2026-0143 Staff observed that the Rider had not been used since inception and made the recommendation that the Schedule UIR Rider be removed. I supported the removal in that case and here I propose to remove it for EMW.

Q: What was the purpose of this Rider?

A: The Underutilized Infrastructure Rider tariff has been in place since 2018, made effective for the Company in ER-2018-0146. The Rider is designed to encourage restoration or adaptive reuse of areas where underutilized distribution infrastructure would be returned to active service. Qualifying non-Residential line extensions choosing to locate on an

underutilized circuit will receive 10% additional Construction Allowance associated with the extension. Since its approval, the Rider has not been used by any customers seeking connection through the Company Line Extension Policy.

Q: What changes are proposed concerning Interval Estimation?

A: In the ER-2026-0143 case the topic of Interval Estimation was raised by Staff and resulted in settlement terms included in a Partial Stipulation and Agreement filed on October 2nd, 2026, agreed to by EMM and Staff and unopposed by OPC, Renew Missouri, and Google LLC. Should the Commission accept that Stipulation and Agreement in the ER-2026-0143 case, the Company proposed those same terms here.

Q: What provisions for Interval Estimation do you propose?

A: The following provisions are proposed contingent on the Commission approval of the same in ER-2026-0143,

- EMW shall continue to maintain records for each estimated bill in accordance with 4 CSR 240-13.020. Such records shall be retained consistent with the Company's existing record retention practices and made available to support customer inquiries. Upon Staff request, EMW shall manually review and provide the specific customer records maintained pursuant to this provision. To facilitate such review, EMW may provide a listing of estimated bills from which Staff may identify reasonable samples or specific accounts for examination.

- EMW will provide reporting to Staff regarding sum check variances, interval estimation data and corrected read information every six months for three years to support the accuracy of the Company estimation processes. This reporting will begin six months after the final order in this case and EMW will meet with Staff annually to review these results. If practical, the Company will combine these d If at the end of this three-year period it is determined the estimates performed by the Company are reasonable, no further changes will be made to the Company estimation process related to concerns raised in this proceeding.

- EMW will revise its Section 6.04(B) to detail the interval estimation processes as following,

> For Customers billed using the interval readings, any missing interval data will be estimated based upon the following rules with the first successful rule applying: 1) same day/time one week prior, 2) same day/time two weeks prior,

3) similar days/times. The sum of interval-based meter readings will be compared to non-interval meter reading totals for the month and differences investigated manually where practical. Identified differences will be applied only to estimated intervals with Schedules RTOU-2 and RTOU-3 proportionate to the number of intervals estimated. Should the number of intervals estimated exceed quality control thresholds established by the Company, the entire monthly bill will be designated as estimated.

- EMW shall modify its threshold for identifying a residential TOU bill as estimated from the current level to 5% of billing-period intervals estimated. This change shall be implemented no later than October 1, 2028. The Company tariff will be modified to add the 5% threshold when implemented.

- For any billing period estimation adjustment greater than 33 kWh, based upon differences in scalar reads and summed interval reads, Evergy shall change its processes such that the adjustment is applied only to intervals estimated for high differential rates including RTOU-3 and RTOU-2 proportionate to the number of intervals estimated. The Company will establish a formal procedure for determining the threshold used in this process. In addition, the Company commits to investigating further system configuration to change the sum check correction process and will implement any configuration that would allow changes to be limited to estimated intervals for all TOU rates.

- EMW may utilize meter performance and failure trend data to identify and proactively replace meter populations exhibiting a higher likelihood of future failure, communication disruption, or interval estimation, with the objective of reducing estimated billing and improving customer bill accuracy.

Q: What should occur if the Commission does not approve the ER-2026-0143 Stipulation?

A: If the Commission does not accept the Stipulation as offered, the Company would withdraw the terms proposed in the prior answer and would instead propose only the new tariff language, the third bulleted item, to detail the interval estimation process for EMW.

Q: What revisions do you propose for the Economic Relief Pilot Program?

A: In the EMM rate case, ER-2026-0143, the Company entered into a Non-Unanimous Programs Stipulation and Agreement that included several tariff revisions for the Economic Relief Pilot Program intended to create more flexibility in program administration. The Company proposes to make those same changes to the EMW version of the program tariff.

Q: What is the benefit of aligning these tariffs?

A: The Economic Relief Pilot Program is an important program for Evergy as it provides an opportunity to relieve the financial hardship experienced by some of our customers by providing participants with a fixed credit on their monthly bill for a period up to 12 months. The revision agreed to in ER-2026-0143 make important changes, allowing customers with arrearages to participate, making participation in evaluations optional, and allowing elderly and those on Supplemental Security Income to have extended program participation. It is important to keep the programs aligned and allow for these changes for EMW customers. It is also noteworthy that the EMM agreement also modified the program name to remove "Pilot."

Q: What revisions do you propose for the Rehousing Low-Income Pilot Program?

A: In the same ER-2026-0143 Non-Unanimous Programs Stipulation and Agreement, the Company agreed to several tariff revisions for the Rehousing Low-Income Pilot Program intended to create more flexibility in program administration. The Company proposes to make those same changes to the EMW version of the program tariff.

Q: Please describe the requested revisions.

A: The Company proposes to make identical changes to the EMW tariff as those approved for EMM. The revisions will revise wording to allow existing customers to participate in the program, use program funds to remain in stable housing, expand the agencies and organizations supporting the program, and offer priority to seniors and single-parter families in addition to the existing priority groups.

Q: If the Non-Unanimous Programs Stipulation and Agreement is not approved in ER-2026-0143, do you still recommend these tariff revisions?

A: No. Alignment of the programs between the EMM and EMW jurisdictions is my primary concern. Whatever the Commission approves in EMM would be my recommendation for these EMW tariffs.

Q: Why should the Residential Battery Energy Storage Pilot be eliminated?

A: The Residential Battery Energy Storage Pilot was established as a fixed-duration pilot, designed to conclude on December 31, 2025, followed by an Evaluation, Measurement, and Verification ("EM&V") study. The EM&V study was completed and shared with stakeholders as planned. This program tariff is no longer in effect, and the sheets, Sheets 163 and 163.1, be reserved for future use.

Q: Does that conclude your testimony?

A: Yes, it does

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Request for Authority to Implement A General Rate Increase for Electric Service	))))	Case No. ER-2027-0077

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 Direct Testimony on behalf of Evergy Missouri West consisting of forty-six (46) 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 3rd day of November 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