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Staff – Exhibit 100
Rebuttal Testimony of Amanda Arandia
Case No. EA-2026-0154

Exhibit No.:	
	Case overview and Summary of Staff's Recommendations
Witness:	*Amanda Arandia*
Sponsoring Party:	*MoPSC Staff*
Type of Exhibit:	*Rebuttal Testimony*
Case No.:	*EA-2026-0154*
Date Testimony Prepared:	*September 15, 2026*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENGINEERING ANALYSIS DEPARTMENT

REBUTTAL TESTIMONY

OF

AMANDA ARANDIA

EVERGY METRO, INC.,
d/b/a EVERGY MISSOURI METRO

CASE NO. EA-2026-0154

Jefferson City, Missouri
September 2026

** Denotes Confidential Information **

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AMANDA ARANDIA

EVERGY METRO, INC. d/b/a EVERGY MISSOURI METRO

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REBUTTAL TESTIMONY

OF

AMANDA ARANDIA

EVERGY METRO, INC. d/b/a EVERGY MISSOURI METRO

CASE NO. EA-2026-0154

Q. Please state your name and business address.

A. My name is Amanda Arandia and my business address is 200 Madison Street, Jefferson City, Missouri 65101.

Q. What is your current position with the Missouri Public Service Commission ("Commission")?

A. I am an Associate Engineer in the Engineering Analysis Department, Industry Analysis Division.

Q. Would you please review your educational background and work experience?

A. My credentials and a list of cases before the Commission in which I have previously provided testimony or analysis is included in Schedule AA-r1.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my testimony is to provide an overview of the case and Staff's recommendations.

Q. Has Staff provided detailed testimony regarding its review and findings in this case?

A. Yes. Staff's full review and findings are discussed in detail by Staff witnesses in rebuttal testimony filed by individual Staff members. A list of the issues discussed and the Staff member who filed testimony on the issues is provided below.

Issue	Staff
Application Requirements and In-Service Criteria	Brodrick Niemeier
Need, Pipeline facilities, Project Updates, Variances	Trevor Rucker
Qualifications of EMM, Siting	Donald Fontana, PE
Financial ability	Seoung Joun Won, PhD
Economic Feasibility	Justin Tevie
Public Interest - Interconnection, Fuel Reporting	Shawn Lange, PE
CWIP in Rate Base	Matthew Young
Procurement of Natural Gas	David Sommerer
Costs of Capacity and LLPS Rate Design Implications	Sarah Lange
Total Revenue Requirement	Randall Jennings
Fuel Adjustment Clause Impacts	Brooke Mastrogiannis

EXECUTIVE SUMMARY

Q. Please provide an overview of the case and EMM's request(s).

A. On May 14, 2026, Evergy Metro, Inc., d/b/a Evergy Missouri Metro ("EMM") filed an application ("Application") seeking a Certificate of Public Convenience and Necessity ("CCN") under subsection 1 of Section 393.170, RSMo, authorizing EMM to construct, install, own, operate, manage, maintain, and control a 440-Megawatt ("MW") simple-cycle gas turbine electric generating facility known as Mullin Creek #2 ("Project") which will be located in Nodaway County, Missouri. The proposed Project will use natural gas as its main fuel, with diesel fuel as a backup fuel source.

EMM has also requested variances pursuant to Section (3)(C) of 20 CSR 4240-20.045 ("CCN Rule"), to provide an overview of plans for operating and maintaining

the Project, and an overview of plans for restoration of safe and adequate service, as required under Subsections (6)(I) and (6)(J) of the CCN Rule, in a later submission.

Q. What are the estimated costs of the Project?

A. EMM witness Ronald A. Klote provided an estimate of ** [redacted] ** in his direct testimony.

Q. Did Staff perform any analyses related to projected costs, revenues, and cost per megawatt ("MW") of the Project?

A. Yes. Staff witness Randall Jennings discusses cost of service projections in his testimony. He projected that the cumulative amount paid by customers for the project from years 2031 through 2070 will be approximately $ ** [redacted] ** generating approximately $ ** [redacted] ** resulting in a net cost of approximately $ ** [redacted] **.

Q. When is the Project expected to be completed?

A. EMM expects the project to be completed by December 31, 2030.

Q. What criteria does Staff use to evaluate a CCN?

A. Staff evaluates CCN Applications and accompanying Direct Testimony based upon the five factors the Commission listed in *In Re Tartan Energy*, 3 Mo.P.S.C.3d 173 (1994) ("Tartan Criteria"):

1. Need,

2. Qualifications to own, operate, control and manage the facilities and provide the service,

3. Financial ability to provide the proposed service,

4. Economic feasibility of the proposed project, and

5. Promotion of the public interest.

These factors provide an over-arching general framework to organize discussion of the evidence when reviewing the various types of CCN applications that come before the Commission. However, Staff's review does not end at surface-level *Tartan* analysis. Each CCN case must be evaluated while considering the regulatory context and operating circumstances of a project.

STAFF REVIEW

Application Requirements

Q. Did EMM meet the application requirements?

A. No. As discussed by Staff witness Brodrick Neimeier, EMM did not provide an overview of plans for operating and maintaining the Project, and an overview of plans for restoration of safe and adequate service, as required under Subsections (6)(I) and (6)(J) of the CCN Rule. Instead, EMM requested a variance from these rule requirements. The requested variances are discussed in more detail by Staff witness Trevor Rucker.

Q. What are Staff's recommendations regarding the requested variances?

A. Staff recommends the Commission grant the requested variances with the following conditions:

1. EMM shall file in this docket or a compliance docket an overview of its operations and maintenance plans within ninety (90) days prior to the date that the Project will be placed in-service, as well as final operations and maintenance plans no later than sixty (60) days after the Project is placed in-service.

2. EMM shall file in this docket or a compliance docket an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages within ninety (90) days prior to the date that the Project will be placed in-service, as well as final plans for restoration of safe and adequate service after significant, unplanned/forced outages no later than sixty (60) days after the Project is placed in-service.

Tartan Criteria

Q. Is the Project needed?

A. Staff has concluded that there is need for the project. In evaluating whether a project is needed, Staff considers the following questions:

a) Is the project both important to the public convenience and desirable for public welfare? or

b) Is the project effectively a necessity because the lack of the service is such an inconvenience?

As discussed by Staff witness Trevor Rucker, EMM has already experienced load growth due to large loads and is anticipating this trend to continue. Additionally, contributing to EMM's need is Southwest Power Pool's ("SPP") switch to a performance-based accreditation ("PBA") methodology for conventional resources, which has led to a reduction of EMM's accredited capacity. Staff has concluded that, for these reasons, the Project is effectively a necessity.

Q. Is EMM qualified to own, operate, control and manage the Project?

A. Yes. Given EMM's considerable amount of experience with the operation and maintenance of electric generation, transmission, and distribution facilities, Staff has concluded that EMM is qualified. Staff witness, Donald Fontana, PE, discusses EMM's qualifications in more detail in his rebuttal testimony.

Q. Does EMM have the ability to finance the Project?

A. Yes. Based on Staff's analysis of the estimated cost of the Project and the financial impact on EMM, which is discussed in detail by Staff witness Seoung Joun Won, PhD, Staff has determined that EMM has the ability to finance the Project.

Q. Is the Project economically feasible?

A. Staff witness Justin Tevie raises multiple concerns in his rebuttal testimony regarding the economic feasibility of the Project as presented. Ultimately, Staff does not recommend reliance on the IRP results to conclude that Mullin Creek is economically feasible.

Q. Is the Project in the public interest?

A. As discussed by Staff witness Shawn Lange, Staff has determined that the Project is in the public interest if Staff's conditions are included. A compiled list of Staff's recommended conditions is included at the end of this testimony.

Other Factors

Q. Did Staff perform any other analyses?

A. As discussed by Staff witness Sarah Lange, Staff performed an analysis on relative costs of EMM's capacity and their relationship to the revenues that would be produced from the demand rates of Large Load Power Service ("LLPS") customers.

Q. What were Staff's findings?

A. Staff's analysis indicates that the current LLPS demand-based rates provide revenues that provide essentially a one-for-one allocation of the current cost of owning EMM's generation fleet on a $/kW year basis. The LLPS demand-based rate is not expected to cover the additional fixed cost of service that will be caused by the addition of the Project. Therefore, in a rate case in which the Project would be included in rates, it will be appropriate to recognize the cost causation for enabling service to LLPS customers.

Q. Does Staff have any additional concerns?

A. Yes. Staff has concerns regarding fuel availability and fuel transportation. The gas procurement plans are still in the development phase. The procurement of natural gas for the Project involves interstate and intrastate transportation and the construction of a lateral pipeline that will be constructed, owned, operated and maintained by a third party in order to transport natural gas to the Project. However, there are no agreements currently in place and EMM has provided no cost-benefit analyses related to EMM's decision to utilize a third party which presents an ongoing expense rather than to build and own the lateral pipeline interconnection. Staff is recommending several conditions related to these concerns.

Staff witnesses Shawn Lange, Trevor Rucker, David Sommerer, and Justin Tevie discuss these concerns in detail and provide their recommended conditions for approval of the CCN related to these concerns.

Q. Did Staff perform any analyses related to future rate impacts?

A. Yes. Staff witness Randall Jennings discusses future rate impacts in detail in his testimony. His analyses describe the future rate impacts for existing customers for a scenario in which no new Large Load customers are added, and for a scenario in which a specified amount of new Large Load customers are added.

Q. Does Staff have any recommendations regarding the allocation of cost for the Project?

A. Staff is not recommending the Commission decide on the allocation of cost of service in this case, however Staff recommends the Commission consider the potential rate impacts to be expected in future cases under the class cost of service allocation approach and allocator calculations submitted by EMM in its currently ongoing rate case.

Q. Does Staff have any concerns related to the FAC?

A. Yes, Staff has concerns regarding how EMM will assign costs and revenues specific to the Project to Missouri customers in its FAC. Evergy Metro, Inc. plans to allocate this project only to Missouri, however does not have a plan to reasonably assign all of the costs and revenues specific to Mullin Creek #2, to Missouri customers in its FAC. Given that the FAC can only be adjusted in a rate case, unless this issue is settled now in EMM's ongoing rate case, it is possible that the next rate case might be in 2030 due to the four-year requirement.

Staff witness Brooke Mastrogiannis explains this in more detail in her testimony and proposes that the Commission order EMM to work with Staff and other stakeholders to determine appropriate treatment and how those calculations will be made now, in the

current EMM general rate case ER-2026-0143, or if that is not possible due to the case timeline, order EMM to come in for another general rate case prior to the Project's in service date.

DECISIONAL PRUDENCE

Q. In this case, EMM requests Commission to find that its decision to construct and operate Mullin Creek #2 is prudent. What does Staff recommend?

A. Staff recommends the Commission consider the concerns raised by Staff witnesses Rucker, Tevie, and Sommerer, as summarized above, and find that the granting of decisional prudence in this instance is not justified based on the evidence presented by EMM.

Q. When does Staff recommend the Commission make a decision regarding the prudence of the Project?

A. Staff recommends the Commission make a decision regarding prudence in a rate case in which the Project will be included in rates, at which time the Project will have been built, then EMM will be able to provide details regarding the actual costs of the Project and Staff will be able to perform its analysis and make a recommendation to the Commission regarding the prudence of those costs.

RECOMMENDATIONS

Q. What are Staff's recommendations?

A. Staff recommends the Commission grant EMM's CCN application for the Mullin Creek #2 Project along with conditions recommended by Staff. Additionally,

Staff recommends the Commission grant EMM's requested variances to provide an overview of plans for operating and maintaining the Project, and an overview of plans for restoration of safe and adequate service, as required under Subsections (6)(I) and (6)(J) of the CCN Rule, in a later submission.

Q. What are Staff's recommended conditions?

1. The Commission limit the amount of CWIP included in rate base to the project's estimate of ** [redacted] .**and that the Commission limit the amount of CWIP included in rate base to the period beginning with the month the project is eligible to accrue AFUDC under the Federal Energy Regulatory Commission's ("FERC") guidance and ending with the anticipated completion date of December 31, 2030.
2. EMM shall file in this docket or a compliance docket quarterly updates on the progress of the natural gas pipeline lateral to provide natural gas supply to the Project. The quarterly updates shall include, but not be limited to, progress regarding the following: all necessary regulatory permits and approvals; plans; specifications; drawings (including the pipeline route); the start of construction; construction (including delays or changes to the anticipated in-service date with a discussion of any impacts to the Project); completion of construction; and placed in-service.
3. EMM shall file in this docket or a compliance docket quarterly updates on the progress of construction for the Project. The quarterly updates shall include, but not be limited to, progress regarding the following: permitting;

plans; specifications; construction; major equipment delivery; injuries; costs (including cost increases and cost overruns); project milestone updates; supply chain issues; delays and duration of delays; anticipated future issues with the anticipated impact, and impacts from legislative or executive actions including tariffs.

4. EMM shall file in this docket or a compliance docket an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages within ninety (90) days prior to the date that the Project will be placed in-service, as well as final plans for restoration of safe and adequate service after significant, unplanned/forced outages no later than sixty (60) days after the Project is placed in-service.
5. EMM shall file in this docket or a compliance docket a copy of any executed Statement of Work ("SOW") for the Project within thirty (30) days of the SOW being finalized and executed.
6. EMM shall file in this docket or a compliance docket a copy of the precedent agreement for the natural gas pipeline lateral to provide natural gas supply to the Project within thirty (30) days of the precedent agreement being finalized and executed.
7. EMM shall file in this docket or a compliance docket notification of any additional capacity purchases for planning seasons prior to the Project being placed in-service that were not included in Evergy Metro's 2026 IRP

Update Preferred Plan ACAA. The notification(s) shall include all terms and documentation of the capacity purchase(s).

8. EMM shall file in this docket or a compliance docket a copy of the completed Generator Interconnection Agreement ("GIA") for the Project, within thirty (30) days of the GIA being finalized and executed.

9. EMM shall file in this docket or a compliance docket quarterly budget reports by construction component/category, and, if applicable, projections of impacts on costs for fuel, material, or equipment that may exceed any estimated contingency accounts.

10. EMM shall obtain all necessary permits to allow for tuning of the CTG on backup fuel.

11. EMM shall utilize the in-service criteria provided by Staff witness Brodrick Niemeier in BAN-r2 (which is based on that of Mullin Creek #1) for determining whether Mullin Creek #2 is fully operational and used for service.

12. EMM shall provide executed transportation agreements with all natural gas pipelines that are intended to serve the Mullin Creek plant(s) within thirty (30) days of the transportation agreements being finalized and executed.

13. Staff Recommends that if Natural Gas becomes unavailable for any EMM fossil-fuel fired generating unit(s) with an accredited capacity of greater than one hundred (100) megawatts that reasonably could be anticipated

to last longer than three (3) days, EMM will report this outage as part of 20 CSR 4240-3.190 (4)(A)3.

14. Staff recommends the Commission order EMM to work with Staff and other stakeholders to determine appropriate treatment and how those calculations will be made in a rate case, prior to implementation of its Mullin Creek #2 in service date.

15. As-built drawings shall be provided within 60 days of Mullin Creek #2 entering service.

16. The Company should complete plans for ensuring the delivery, storage, and uploading of the liquid fuel back-up within 60 days of the facility being placed in service.

17. The Company should evaluate contingency plans consistent with Mr. Sommerer's testimony[1].

18. Evergy should consider alternative battery configurations such as a 6- or 8-hour type in future IRP analysis.

19. Future IRP analysis should not constrain the model to build ½ CC per year.

20. EMM shall evaluate the ** [redacted] ** if the ** [redacted] ** and file such evaluation in this case.

Q. Does this conclude your rebuttal testimony?

[1] Rebuttal Testimony of David Sommerer, page 5, lines 11-13.

A. Yes it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro for Permission and Approval of a Certificate of Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Manage, Maintain, and Control a Natural Gas Electrical Production Facility	)))))))	Case No. EA-2026-0154

AFFIDAVIT OF AMANDA ARANDIA

STATE OF MISSOURI	)	
	)	ss.
COUNTY OF COLE	)	

COMES NOW AMANDA ARANDIA and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Amanda Arandia;* and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Amanda Arandia

AMANDA ARANDIA

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 9th day of September 2026.

Dianna L. Vaught

Notary Public

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2027
Commission Number: 15207377

Amanda Arandia

Present Position:

I am an Associate Engineer in the Engineering Analysis Department, of the Industry Analysis Division of the Missouri Public Service Commission.

Educational Background and Work Experience:

I received my Bachelor of Science in Chemical Engineering from the University of Missouri in 2012. I was employed by the Missouri Department of Natural Resources as an Environmental Engineer from 2015 through 2018. I have been employed by the Commission since 2018.

Case History:

Case Number	Utility	Type	Issue
EC-2020-0252	Evergy West	Electric	Formal Complaint
EO-2019-0315	KCPL	Electric	RES Compliance Report
EO-2019-0316/ EO-2019-0317	KCPL	Electric	RES Compliance Plan
EO-2019-0396	City of Gallatin	Electric	Addendum to Territorial Agreement
ER-2019-0374			
EO-2020-0060	Farmers' Electric	Electric	Territorial Agreement
EO-2020-0329/ EO-2020-0330	Evergy Metro	Electric	RES Compliance
EO-2020-0331/ EO-2020-0332	Evergy Metro	Electric	RES Compliance
EO-2020-0341	Evergy Metro	Electric	Vegetation Management Report
EO-2020-0342	Evergy West	Electric	Vegetation Management Report
EO-2021-0001	Empire	Electric	Reliability Compliance Report
ET-2021-0082	Ameren	Electric	Surge Protection Program
SA-2019-0161	United Services	Sewer	Depreciation
SR-2019-0157	S.K.&M.	Sewer	Depreciation
EA-2020-0371	Ameren	Electric	CCN Application Requirements

EO-2021-0163	SEMO	Electric	Change of Supplier
EO-2021-0345	Evergy Metro	Electric	RES Compliance
EO-2021-0346	Evergy West	Electric	RES Compliance
EO-2021-0347	Evergy Metro	Electric	RES Compliance
EO-2021-0348	Evergy West	Electric	RES Compliance
SA-2022-0014	Elm Hills	Sewer	Depreciation
SA-2022-0029	Mid Mo Sanitation	Sewer	Depreciation
EE-2022-0074	Ameren	Electric	Variance Request
WA-2021-0391 /SA-2021-0392	Missouri American Water	Water/Sewer	Depreciation
WA-2022-0049	Missouri American Water	Water/Sewer	Depreciation
ER-2021-0240	Ameren	Electric	Rate Case
ER-2021-0312	Empire	Electric	Rate Case
ER-2022-0129/ ER-2022-0130	Evergy	Electric	Rate Case – Green Pricing Plan
WA-2023-0003	Confluence Rivers	Water/Sewer	Depreciation
GR-2022-0179	Spire	Gas	Depreciation
EA-2022-0244	Ameren	Electric	Renewable Energy
WR-2022-0303	Missouri American Water	Water/Sewer	Depreciation
ER-2022-0337	Ameren	Electric	Solar Rebate Tariff, Landfill and Solar In-Service Criteria
ET-2023-0197	Empire	Electric	Solar Rebate Tariff
EO-2023-0361	Evergy Metro	Electric	RES Compliance
EO-2023-0362	Evergy West	Electric	RES Compliance
WR-2023-0344	Raytown	Water	Depreciation
EE-2024-0037	Ameren	Electric	Variance
EO-2024-0301	Evergy Metro	Electric	RES Compliance Report
EO-2024-0299	Evergy Metro	Electric	RES Compliance Plan
GR-2024-0106	Liberty Midstates	Gas	Depreciation
SR-2024-0306	TBJ Sewer	Sewer	Depreciation

ER-2024-0189	Evergy West	Electric	Depreciation, Continuing Property Record, Steam Allocations
WR-2024-0104	Liberty Water	Water	Depreciation
ER-2024-0319	Ameren	Electric	Depreciation
EO-2025-0040	Evergy	Electric	Depreciation Accounting Order
EO-2025-0283	Evergy West	Electric	RES Compliance
EO-2025-0282	Evergy Metro	Electric	RES Compliance
EA-2024-0292	Evergy	Electric	Solar CCN
HO-2025-0244	Evergy	Steam	Depreciation Accounting Order
EO-2025-0154	Evergy	Electric	Renewable Programs
ER-2024-0261	Empire	Electric	Electrification Program
ET-2025-0154	Ameren	Electric	Renewable Programs
EE-2026-0114	Ameren	Electric	RES Variance
EA-2025-0238	Ameren	Electric	CCN
EA-2025-0239	Ameren	Electric	CCN
ER-2021-0312	Empire	Electric	Tariff Update
ER-2026-0143	Evergy Metro	Electric	Depreciation