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Exhibit No. 101

Staff – Exhibit 101
Rebuttal Testimony of Donald A. Fontana
Case No. EA-2026-0154

Exhibit No.:
Issue(s): *Qualifications; Siting; Engineering Conditions*
Witness: *Donald A. Fontana*
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

EMGINEERING ANALYSIS DEPARTMENT

REBUTTAL TESTIMONY

OF

DONALD A. FONTANA

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

CASE NO. EA-2026-0154

Jefferson City, Missouri
September 2026

** Denotes Confidential Information **

REBUTTAL TESTIMONY

OF

DONALD A. FONTANA

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 Donald A. Fontana, and my business address is Missouri Public Service Commission P.O. Box 360, Jefferson City, Missouri 65102.

Q. What is your position with the Missouri Public Service Commission, and what are your qualifications?

A. I am a Senior Professional Engineer with the Industry Analysis Division.

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

A. My credentials and a list of cases in which I have previously provided testimony to the Commission are included as Schedule DF-r1.

EXECUTIVE SUMMARY

Q. What is the purpose of your rebuttal testimony?

A. I will discuss whether the applicant is qualified to construct, install, own, operate, maintain, and otherwise control and manage the proposed Project; and siting of the Project.

EVERGY MISSOURI METRO QUALIFICATIONS

Q. Please discuss whether the applicant is qualified to construct, install, own, operate, maintain, and otherwise control and manage the Project.

A. Evergy Missouri Metro (EMM) has had a considerable amount of experience throughout their history with the operation and maintenance of electric generation facilities, as well as the operation and maintenance of transmission line facilities and distribution facilities to provide electricity to their customers. EMM is also experienced in the construction, operation, and ownership of various types of power generation methods and assets, including natural gas generation facilities such as the unit being proposed at the Mullin Creek #2 location. EMM has staff that possess construction skills, expertise, and technical knowledge and abilities that are required for the construction of new natural gas-fired generation units, as well as the abilities which are needed to bring these types of generation units on-line and to make and keep them operational and functional.

Q. What is Staff's conclusion with respect to EMM's qualifications?

A. Staff concludes that EMM is qualified to construct, install, own, operate, maintain, and otherwise control and manage the Project.

PROJECT SITE SELECTION

Q. Please discuss how EMM selected the site where the proposed project will be constructed.

A. In 2023, EMM hired ** [redacted] ** to perform a study to help them identify and determine potential sites in Kansas and Missouri to construct electrical

generation facilities. The ** [redacted] ** study included the parcel selected for the Mullin Creek #1 in Nodaway County, Missouri, and is also where the proposed Mullin Creek #2 project would be constructed.[1]

Q. What steps were used in the siting study?

A. The siting study used the following four steps to identify potential construction locations:

1) Identifying electrical bus locations in the study areas that would allow the greatest amount of electricity to be transferred before it would be limited by EMM's transmission facility ratings;

2) Identifying whether the potential sites closest to the preferred electrical bus locations were also located within a 15-mile radius to adequate natural gas supplies as well as electrical interconnections;

3) Identifying and removing any locations from further consideration that either have, or which would potentially create any type of environmental justice concerns if located near highly populated areas, or would possibly encounter any other environmental permitting issues; and

4) ** [redacted] ** and EMM then sorted the potentially most suitable locations one step further to identify locations that offered larger available land area than what would strictly be required for construction of the proposed electrical generation facilities.

[1] EA-2025-0075, Direct Testimony of J. Kyle Olson, Section IV. Site Selection, Pages 12 – 17.

Q. What were the results of the siting study?

A. When the initial process concluded, there were a total of 62 locations selected for further evaluation. Additional analysis and screening reduced the number of potentially suitable sites to 21 locations. The attachment to Evergy's response to Staff Data Request 0061 in Commission Case No. EA-2025-0075 ** [redacted] ** contains a detailed explanation of the analysis and screening methods that were applied and is attached as Schedule DF-r2.

Q. How did EMM further narrow the selected sites?

A. The following six additional pertinent factors were used to further condense and refine the number of potentially suitable sites:

- Availability of natural gas at each of the analyzed sites;
- The size of the natural gas pipeline;
- The distance of a natural gas pipeline to a potential site;
- The distance from the site under analysis to the location at which the bus would be potentially connected;
- The capacity of the bus generator for the potential site; and,
- Status of property ownership (whether it was privately owned at the time of analysis, whether Evergy owned it, or whether Evergy had a lease option on the property) for the potential locations.

Each of the six additional factors were ranked on a scale of 1 to 5, which allowed the application of a consistent method to fine tune the site analysis process. Through the

application of this process, EMM and **[redacted] **

Q. Will the proposed Mullin Creek #2 project be constructed on the same parcel as the Mullin Creek #1 parcel, and will it require the same amount of land?

A. Yes, the Mullin Creek #2 facility will be constructed on the same existing parcel as the Mullin Creek #1 facility. The acreage required to construct the proposed Mullin Creek #2 facility will be approximately the same as that of the Mullin Creek #1 facility. Both facilities will receive their water from a common, shared water lateral line, and both facilities will share the same backup fuel storage facility which is large enough to supply both facilities if needed.

Q. What is Staff's conclusion on EMM's site selection for the proposed Mullin Creek #2 project?

A. The conclusion of Staff is that Evergy has done its due diligence in evaluating, assessing, and selecting the site of the proposed Mullin Creek #2 SCGT.

CONCLUSION

Q. What is Staff's conclusion on EMM's site selection for the proposed Mullin Creek #2 project?

A. Staff concludes that EMM has done its due diligence in evaluating, assessing, and selecting the site of the proposed Mullin Creek #2 SCGT.

Q. Does this conclude your rebuttal testimony?

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 DONALD A. FONTANA, PE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW DONALD A. FONTANA, PE, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of Donald A. Fontana, PE*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

Donald A. Fontana

DONALD A. FONTANA, PE

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 10th 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

Donald A. Fontana, PE

Current Position:

I am a Senior Professional Engineer in the Industry Analysis Division of the Missouri Public Service Commission.

Educational Background and Work Experience:

I received a Bachelor of Science degree in Civil Engineering from the University of Missouri – Columbia in 1998, and I am a Registered Professional Engineer in the State of Missouri.

After graduation, I was initially employed as a consultant Designer (Engineer-In-Training) and obtained licensure in Missouri as a Professional Engineer in 2004 (License Number 2004017168).

I have been employed as a staff member with the Missouri Public Service Commission from December 2024 through the present (currently September 2026). To date, I have not testified before the Missouri Public Service Commission.

Testimony Filed:

Case Number	Utility	Testimony	Issue
EA-2026-0183	Ameren	Staff Report	Review Application for Rule Requirements; Overall Summary / Conclusion; Siting; BESS Safety; Consumer Comments; Restoration / Operational Plans; Construction Reporting
EA-2025-0299	Liberty / Empire	Staff Report	Exec. Summary; Application Summary; Review Application for Rule Requirements; Qualifications of Liberty to Construct, Own, Operate, and Maintain; Overall Summary / Conclusion; Siting
EA-2025-0028	Ameren Missouri	Staff Report	Application Requirements, Qualifications, Public Interest, Recommended Conditions
EA-2024-0292	Evergy Missouri West	Staff Report	Application Requirements, Qualifications, Siting Study, Recommended Conditions

Case Number	Utility	Testimony	Issue
EA-2025-0075	Evergy Missouri West / Evergy Missouri Metro	Staff Report	Qualifications, Siting Study, Recommended Conditions
EA-2025-0087	Ameren Transmission Company of Illinois (ATXI)	Staff Report	Qualifications, Public Interest, Recommended Conditions, Routing Study
EA-2025-0222	Ameren Transmission Company of Illinois (ATXI)	Staff Report	Executive Summary, Tartan Analysis – Need, Tartan Analysis – Routing and Conditions
EA-2025-0238	Ameren Missouri	Staff Report	Tartan Public Interest – Consumer Comments, BESS Safety, Contributed to the Restoration/ Operational Plans section
EA-2025-0239	Ameren Missouri	Staff Report	<u>General</u> – Review Application Rule Requirements <u>Tartan Factors</u> – Qualification of Ameren to Construct, Own, Operate, and Maintain <u>Public Interest</u> – Consumer Comments -Siting Evaluation -Construction Reporting/ Bid Evaluation (RFP Scoring)

Case Number	Utility	Testimony	Issue
EA-2026-0018	Ameren Missouri	Memorandum	General – Review Application Rule Requirements Tartan Factors – Qualification of Ameren to Construct, Own, Operate, and Maintain Public Interest – Consumer Comments -Siting Evaluation -Construction
EE-2026-0234	Ameren Missouri	Memorandum	Review, evaluation and recommendation for a Vegetation Management Variance
WR-2025-0292	Environmental Utilities, LLC	Staff Report	Depreciation Rate Recommendation

Case No. EA-2026-0154

INFORMATION CONTAINED IN

SCHEDULE DF-r2

IS DEEMED CONFIDENTIAL

IN ITS ENTIRETY