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Service Commission

Exhibit No. 102

Staff – Exhibit 102
Rebuttal Testimony of Randall T. Jennings
Case No. EA-2026-0154

Exhibit No.:	
Issue(s):	*Total Revenue Requirement*
Witness:	*Randall T. Jennings*
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

TARIFF/RATE DESIGN DEPARTMENT

REBUTTAL TESTIMONY

OF

RANDALL T. JENNINGS

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

CASE NO. EA-2026-0154

Jefferson City, Missouri
September 2026

** Denotes Confidential Information **
*** Denotes Highly Confidential Information ***

TABLE OF CONTENTS OF

REBUTTAL TESTIMONY OF

RANDALL T. JENNINGS

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CASE NO. EA-2026-0154

COST OF SERVICE PROJECTIONS 3

RATE IMPACTS 4

COST ALLOCATION 9

REBUTTAL TESTIMONY

OF

RANDALL T. JENNINGS

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 Randall T. Jennings, 200 Madison Street, Jefferson City, Missouri 65101.

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

A. I am employed by the Missouri Public Service Commission ("Commission") as a Senior Research and Data Analyst for the Tariff/Rate Design Department, in the 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 through affidavit is included in Schedule RTJ-r1.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to describe the inputs to Staff's modeling of the annual revenue requirements and estimated allocated rate impacts of the assets proposed by Evergy Metro, Inc., d/b/a Evergy Missouri Metro ("EMM").

Q. Is Staff's modeling a prediction of actual rate impacts?

A. No, this modeling is not a prediction of future rate impacts, in that EMM's managerial decisions, actual inflation levels, actual rate case timing, future commission determinations, and future energy and fuel costs cannot be exactly predicted. Staff's reliance on a particular input or use of a particular modeling approach should not be interpreted as an endorsement or recommendation of that approach or outcome.

Q. How did Staff determine the allocations used for its analysis?

A. For allocations of cost of service to the rate classes, Staff relied on EMM's determinants, methods, and calculations as requested in Case No. ER-2026-0143. Staff did not perform an independent cost of service calculation and relied entirely on the revenue requirements provided by EMM in response to Staff Data Request ("DR") No. 0007, including estimates of in-service lives of 50 years for the Interconnection asset and 40 years for the generation asset.

Q. Did Staff calculate the projected generation of this project?

A. No. Staff relied solely upon the amount supplied by EMM in response to Staff DR 0007 which provided the expected annual generation in megawatt hours.

Q. Did Staff calculate the projected revenue of this project?

A. Staff used EMM's generation market prices filed in Case No. EO-2026-0188 (EMM's Integrated Resource Plan Annual Update) to find the average of the highest fifteen percent (15%). This average was then multiplied by the annual generation supplied by EMM to estimate the projected annual revenue.

COST OF SERVICE PROJECTIONS

Q. What is the overall projected asset costs and revenues?

A. 2031 is scheduled to be the first full year the assets will be in operation. Data obtained from EMM's application, witness testimony, and responses to Staff DR 0007 indicates 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. Did Staff incorporate additional large load customers ("LLCs") into any of its analysis?

A. Yes. For scenarios reflecting additional LLCs, Staff incorporated *** [redacted] ***[1] MW of new LLCs with an 85% load factor into the allocator calculation. The variation of these projections to actual results and variables such as rate case timing could alter actual customer impacts.

Q. How did Staff determine the amount of new LLCs to incorporate into the allocator calculation?

A. Staff based this amount upon Staff witness Trevor Rucker's testimony which cites EMM responses to Staff DRs 0018, 0019, and 0054.

Q. Did EMM provide estimates of fuel expenses for the project and if not, how did Staff address this expense?

[1] *** [redacted] ***

A. EMM stated that fuel costs have not been estimated.[2] As an alternative, Staff used EMM witness workpapers submitted in Case No. ER-2026-0143 to approximate the average fuel cost per MW for a natural gas-powered combustion turbine generator.[3]

RATE IMPACTS

Q. Does Staff recommend consideration of rate impacts of the project?

A. In considering the need, economic feasibility, and public interest of the proposed Project, 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.[4]

Q. Is rate case timing or other factors that might cause increases in rates considered in Staff's analysis?

A. No. It is important to note that in the scenarios discussed in this testimony Staff does not address rate case timing, rate increases for any reason over the lifespan of the projects and relies upon workpapers provided by EMM in response to Staff DR 0007 and those provided in Case ER-2026-0143.

Q. Does EMM assume future rate cases into its response to Staff DR 0007?

[2] Company response to Staff DR 0007.1.
[3] See Case No. ER-2026-0143, EMM witness Hsin Foo workpapers.
[4] See Case No. ER-2026-0143.

A. Yes, EMM stated that "the illustration assumes two rate cases between now and when the project is anticipated to be complete"[5] at the end of 2030.

Q. Can Staff illustrate the rate impact for years 2031 through 2080 for each class without any additional customers?

A. Yes, graph 1 depicts the unadjusted net annual rate impact without additional LLCs for years 2031 through 2070.

Graph 1: Unadjusted Net Annual Rate Impact without New LLCs 2031-2070

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If the Project is completed but no additional customers are added, the Residential rate class would pay approximately $ ** [redacted] ** in additional rate charges during

[5] Company response to Staff DR 0014.

the first 40 years (the expected lifespan of the generating unit) of the assets' lives or ** [redacted] ** % of the total additional rate charges this Project will cause during that time frame. Each hypothetical residential customer would pay an additional $ ** [redacted] ** over the span of those 40 years.

Q. Can Staff illustrate the rate impact for years 2031 through 2070 for each class if EMM adds *** [redacted] *** MW of LLCs?

A. Yes, graph 2 depicts the unadjusted annual rate impact to customers for years 2031 through 2070 with *** [redacted] *** MW of new LLCs.

Graph 2: Unadjusted Annual Rate Impact with New LLCs Added 2031-2070

**

[redacted]

**

If the Project is completed and *** [redacted] *** MW of new LLCs are added, the Residential rate class would still pay approximately $ ** [redacted] ** in additional rate charges during the first 40 years of the assets' lives or ** [redacted] **% of the total additional

rate charges. While this amount is ** [redacted] ** % less than it would be if no LLCs are added, it still represents an increase in rates for each customer with each hypothetical residential customer paying an additional $ ** [redacted] ** over the span of those 40 years.

Q. Is the Residential class the only rate class affected by the addition of Project?

A. No. Other rate classes will also be affected by inclusion of the assets. The table below (Table 1) lists the number of customers in each rate class, the total amount paid by each customer in the respective rate classes during years 2031 through 2070 based upon an estimated average power usage, whether or not *** [redacted] *** MW of new LLCs are added, and the totals for each rate class. Schedule RTJ-r2 filed with this report contains additional detail.

Table 1: Rate Class Customers & Total Paid 2031-2070

**

[redacted]

**

For example, if the project is completed but no additional customers are added, the LGS[6] rate class will pay approximately ** [redacted] ** % of the total project costs during

[6] Large General Service (LGS).

years 2031 through 2070. If *** [redacted] *** MW of new LLCs are added, the percentage of costs paid by the LGS rate class will be reduced to ** [redacted] ** % of the total costs.

Q. Is the annual impact on each customer, regardless of class, the same every year of the project's lifespans?

A. No. The following (graph 3) illustrates the annual impact to a hypothetical residential customer for each year of the generating unit's lifespan (2031-2070). Staff's analysis indicates that the annual impact will range from $ ** [redacted] ** to $ ** [redacted] ** over these years.[7]

Graph 3 – Annual Residential Customer Unadjusted Rate Impact 2031-2070

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[7] These figures do not address rate case timing or rate increases for any reason over the life of the plant, and relies solely upon workpapers provided by EMM in its response to Staff DR 0007.

COST ALLOCATION

Q. Is Staff making a recommendation regarding the allocation of the cost of this project?

A. No. For the purposes of the scenarios discussed in this testimony, Staff used EMM's service allocation approach in its currently ongoing rate case.[8] However, Staff is not recommending that the Commission decide on the allocation of the cost of service of the Project in this case. Such a determination is appropriate for subsequent rate cases in which recovery for these assets is sought so that the Commission may consider all relevant factors in place at that time.

Q. Does this conclude your rebuttal testimony?

A. Yes it does.

[8] See Case No. ER-2026-0143.

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 RANDALL T. JENNINGS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW RANDALL T. JENNINGS and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of Randall T. Jennings;* and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

RANDALL T. JENNINGS

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

Notary Public

Randall T. Jennings

Present Position:

I began employment with the Missouri Public Service Commission in October 2021 as a Utility Regulatory Auditor and was later promoted to the position of Senior Utility Regulatory Auditor; both in the Financial Analysis Department of the Financial and Business Analysis Division. In July 2024 I moved to the Tariff and Rate Design Department of the Industry Analysis Division as a Research and Data Analyst and in November 2025, I was promoted to the position of Senior Research and Data Analyst with the same department.

Educational Background and Work Experience:

I earned a Bachelor of Science degree in Business Administration from Drury University in Springfield, MO. I was previously employed as a Regulatory Auditor and Supervisor with the Missouri Division of Professional Registration for 11 years and prior to that as an Investigator for the Missouri Attorney General for 8 years.

Case Participation:

Company Name	Case Number	Case Type / Type of Testimony or Filing	Utility
The Raytown Water Company	WF-2021-0427	Finance – Staff Memorandum	Water
Evergy Missouri West, Inc., d/b/a Evergy Missouri West	EF-2022-0103	Finance – Staff Memorandum	Electric
Summit Natural Gas of Missouri, Inc.	GR-2022-0122	Tariff Revision – Rebuttal & Surrebuttal Testimony	Gas
Missouri American Water Company	WF-2022-0161	Finance – Staff Memorandum	Water
Union Electric Company, d/b/a Ameren Missouri	EF-2022-0164	Finance – Staff Memorandum Financing Compliance – Staff Memorandum	Electric
Spire Missouri Inc.	GF-2022-0169	Finance – Staff Memorandum	Gas
Summit Natural Gas of Missouri, Inc.	GF-2022-0216	Finance – Staff Memorandum	Gas
S.K. & M. Water and Sewer Company	SR-2022-0239 WR-2022-0240	Rate Case – Staff Memorandum	Water
Missouri American Water Company	WR-2022-0303	Rate Case – Direct, Rebuttal & Surrebuttal Testimony	Water
Argyle Estates Water Supply	WR-2022-0345	Rate Case – Staff Memorandum	Water
Confluence Rivers Utility Operating Company, Inc.	WA-2023-0026	CCN – Staff Recommendation	Water
Liberty Utilities (Midstates Natural Gas) Corp., d/b/a Liberty	GF-2023-0280	Finance – Staff Memorandum	Gas
Confluence Rivers Utility Operating Company, Inc.	WA-2023-0284	CCN – Staff Recommendation	Water
The Raytown Water Company	WR-2023-0344	Rate Case – Direct, Rebuttal & Surrebuttal Testimony	Water
Evergy Metro Inc., d/b/a Evergy Missouri Metro	EF-2023-0425	Finance – Staff Memorandum	Electric
Union Electric Company, d/b/a Ameren Missouri	EO-2023-0448	Nuclear Decommissioning – Rebuttal & Surrebuttal Testimony	Electric
Evergy Missouri West, Inc., d/b/a Evergy Missouri West	ER-2024-0189	RESRAM Prudence – Staff Memorandum	Electric
The Empire District Electric Company d/b/a Liberty	ER-2024-0261	Rate Case – Direct and Rebuttal Testimony	Electric

continued Randall T. Jennings
Case Participation

Company Name	Case Number	Case Type / Type of Testimony or Filing	Utility
Evergy Missouri West, Inc., d/b/a Evergy Missouri West	EA-2024-0292	CCN – Staff Recommendation	Electric
Union Electric Company, d/b/a Ameren Missouri	ER-2024-0319	RESRAM Prudence – Staff Memorandum	Electric
Holtgrewe Farms Water Company, LLC	SR-2024-0344 WR-2024-0343	Rate Case – Staff Memorandum	Sewer Water
Missouri American Water Company	WF-2024-0353	Finance – Staff Memorandum	Water
Union Electric Company, d/b/a Ameren Missouri	ER-2025-0119	RESRAM Adjustment Mechanism – Memorandum	Electric
Evergy Missouri West, Inc., d/b/a Evergy Missouri West	ET-2025-0121	RESRAM Tariff Sheet – Memorandum	Electric
Evergy Missouri Metro, Inc., d/b/a Evergy Missouri Metro	EO-2025-0173	DSIM Rider Rate Adjustment and Rate Tariff Sheet – Memorandum	Electric
Evergy Missouri West, Inc., d/b/a Evergy Missouri West	EO-2025-0174	DSIM Rider Rate Adjustment and Rate Tariff Sheet – Memorandum	Electric
Evergy Missouri West, Inc. Evergy Missouri Metro, Inc.	EE-2025-0084	Tariff Variances	Electric
Union Electric Company, d/b/a Ameren Missouri	EA-2025-0239	CCN – Staff Recommendation	Electric
The Empire District Electric Company d/b/a Liberty	EA-2025-0299	CCN – Staff Recommendation	Electric
Evergy Missouri Metro, Inc., d/b/a Evergy Missouri Metro	EO-2025-0325	DSIM Rider Rate Adjustment and Rate Tariff Sheet – Memorandum	Electric
Evergy Missouri West, Inc., d/b/a Evergy Missouri West	EO-2025-0326	DSIM Rider Rate Adjustment and Rate Tariff Sheet – Memorandum	Electric
Union Electric Company, d/b/a Ameren Missouri	ER-2026-0081	RESRAM Adjustment Mechanism – Memorandum	Electric
Evergy Missouri West, Inc., d/b/a Evergy Missouri West	ET-2026-0086	RESRAM Adjustment Mechanism – Memorandum	Electric
Evergy Missouri Metro, Inc., d/b/a Evergy Missouri Metro	EO-2026-0138	DSIM Rider Rate Adjustment and Rate Tariff Sheet – Memorandum	Electric
Evergy Missouri West, Inc., d/b/a Evergy Missouri West	EO-2026-0139	DSIM Rider Rate Adjustment and Rate Tariff Sheet – Memorandum	Electric
Union Electric Company, d/b/a Ameren Missouri	EA-2026-0183	CCN – Staff Recommendation	Electric
Evergy Missouri Metro, Inc., d/b/a Evergy Missouri Metro	ER-2026-0143	Rate Case – Direct, Rebuttal, and Surrebuttal Testimony	Electric

Case No. EA-2026-0154

SCHEDULE RTJ-r2

HAS BEEN DEEMED

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IN ITS ENTIRETY