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Staff – Exhibit 107
Rebuttal Testimony of Trevor Rucker
Case No. EA-2026-0154

Exhibit No.:	
Issue(s):	*Need, Natural Gas Pipeline Facilities, Project Updates, Variance Requests*
Witness:	*Trevor Rucker*
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

TREVOR RUCKER

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

TREVOR RUCKER

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

CASE NO. EA-2026-0154

Introduction 1
Need for the Project 2
SPP Requirements 2
2026 IRP Annual Update 4
Load Growth 9
Conclusion on Need 11
Natural Gas Pipeline Facilities 11
EMM Status Reports 14
Variance Requests 16
Conclusion 18

REBUTTAL TESTIMONY

OF

TREVOR RUCKER

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

CASE NO. EA-2026-0154

INTRODUCTION

Q. Please state your name and business address.

A. My name is Trevor Rucker, and my business address is Missouri Public Service Commission, P.O. Box 360, Jefferson City, Missouri 65102.

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

A. I am a Senior Project Manager in the Engineering Analysis Department of 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 TR-r1.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to respond to Evergy Missouri Metro ("EMM") witnesses on the topics of need, natural gas pipeline facilities, and project updates for the Mullin Creek #2 Project ("Project"). I will also discuss EMM's variance requests in its Application for a Certificate of Convenience and Necessity ("CCN")

for the Project regarding an overview of EMM's plans to operate and maintain the Mullin Creek #2 facility and EMM's plans for restoration of safe and adequate service of the Mullin Creek #2 facility.

NEED FOR THE PROJECT

Q. What reasons did EMM's witnesses provide for the need of the Project?

A. EMM witness Mr. Jason Humphrey states that "...Evergy's utilities as a whole are acutely seeing the impacts of new methods of capacity accreditation, increased demand, and increased reserve-margin requirements."[1] EMM witness Mr. Cody VandeVelde further states that "Evergy Metro's capacity needs are expected to grow over time, primarily due to increasing SPP planning reserve margin requirements and load growth."[2]

SPP Requirements

Q. Regarding the new methods of capacity accreditation noted by Mr. Humphrey, what recent changes did Southwest Power Pool ("SPP") make to its capacity accreditation methodologies?

A. Starting in the Summer 2026 planning season, SPP began using a performance-based accreditation ("PBA") methodology to determine the accredited capacity ("ACAP") for conventional resources.[3,4] SPP's PBA methodology is discussed in more detail in Confidential Schedule TR-r2.

[1] Jason Humphrey Direct Testimony Page 5, lines 5-7.
[2] Cody VandeVelde Direct Testimony Page 6, lines 8-9.
[3] Section 1.0 of Southwest Power Pool ("SPP") Open Access Transmission Tariff ("OATT") Business Practice 8400, revision date 5/5/2026.
[4] Conventional resources, for the purposes Business Practice 8400, are defined as thermal fuel type resources (i.e. natural gas, petroleum, coal, nuclear, biomass, geothermal, waste heat), pump storage

Q. What was the impact of the shift to a PBA methodology on the accreditation of Evergy Metro's existing capacity resources?

A. The shift to a PBA methodology for conventional resources led to a reduction of Evergy Metro's ACAP of approximately ** [redacted] ** between Summer 2025 and Summer 2026 and ** [redacted] ** between Winter 2025-2026 and Winter 2026-2027.

Q. As noted above, both Mr. Humphrey and Mr. VandeVelde point to changes to reserve-margin requirements; what changes did SPP make to its planning reserve margin ("PRM")?

A. In Summer 2026, SPP began using a separate PRM for the summer and winter planning seasons and began using an ACAP PRM[5] to determine resource adequacy requirements. The change to separate PRMs for the summer and winter planning seasons resulted in a lower PRM for the summer planning season, but an increased PRM for the winter planning season.

Q. What is the combined impact on Evergy Metro's capacity balances because of the SPP changes to the PBA methodology for conventional resources and separate PRMs for the summer and winter planning seasons?

hydroelectric resources, and hydroelectric resources with reservoir storage capability not subject to hourly river flow limitations similar to run-of-river hydro.

[5] The ACAP PRM is calculated by applying the base PRM to SPP's total forecasted peak demand to find the base PRM required capacity, making a conventional resource performance adjustment (which includes a fuel assurance component for winter), subtracting the forecasted peak demand from the adjusted required capacity, and then dividing by the forecasted peak demand to get the ACAP PRM as a percentage.
SPP ACAP PRM – Summer 2026, published September 26, 2025.
SPP ACAP PRM – Winter 2026-27, published March 31, 2026.

A. While Evergy Metro is still a summer peaking system,[6] the use of a PBA methodology and an increased winter ACAP PRM have resulted in Evergy Metro's capacity balances for the winter planning season being less than those for the summer planning season.

2026 IRP Annual Update

Q. How are Evergy Metro's capacity balances determined?

A. Evergy Metro's capacity balances are determined by subtracting the result of Evergy Metro's forecasted peak demand[7] multiplied by the ACAP PRM from Evergy Metro's total system capacity.[8] EMM provides its capacity balances as part of the integrated resource planning required by 20 CSR 4240-22.

Q. When did EMM provide its most recent capacity balances?

A. On May 7, 2026, EMM filed its 2026 Annual IRP Update ("2026 IRP Update") in Commission Case No. EO-2026-0188.[9] In the 2026 IRP Update, Evergy Metro discussed a change from Plan AAAA to Plan ACAA for its preferred plan. Evergy Metro additionally included capacity balance tables for the summer planning season. In response to Staff Data Request ("DR") No. 0027, included in Highly Confidential Schedule TR-r3, EMM provided capacity balance tables for the winter planning season for Evergy Metro.

[6] A summer peaking system is a system in which the peak demand is greatest in the summer planning season.
[7] An electric utility's forecasted peak demand is the maximum demand that the utility expects for the specified time frame, such as a planning season.
[8] The total system capacity includes Evergy Metro's total generation capacity (accredited) of owned resources and capacity transactions including capacity purchases and capacity sales.
[9] Evergy Metro's IRP covers Evergy Missouri Metro ("EMM") and Evergy Kansas Metro ("EKM") combined.

Q. Which capacity balance tables did Staff use for its analysis on the topic of need?

A. The capacity balances tables provided by EMM included multiple resource plans considered by Evergy Metro. For its analysis on the topic of need, Staff used the capacity balance tables for Evergy Metro's current preferred plan, Plan ACAA.

Q. What other resources are included in Evergy Metro's Preferred Plan ACAA?

A. In addition to the Project, Evergy Metro's Preferred Plan ACAA includes additional capacity projects in the near-term, including 150 MW of solar in 2028, 150 MW of battery storage in 2030, and 355 MW of a combined cycle gas turbine ("CCGT") in 2032.[10] Evergy Metro is planning to allocate the CCGT project to EMM with the solar and battery storage projects being allocated to EKM.[11] Staff's analysis on need in this case is limited to the Project and makes no determination on the need of other projects included in Evergy Metro's Preferred Plan ACAA. Staff included the capacity for the other projects listed in Evergy Metro's Preferred Plan ACAA for the purpose of determining the need of Mullin Creek #2 specifically.

Q. What ACAP is EMM anticipating for the Project?

A. In response to Staff Data Request 0049, included in Highly Confidential Schedule TR-r3, EMM stated:

** [redacted]

[10] The CCGT capacity represents half of a CCGT project to be split with Evergy Missouri West ("EMW").
[11] EMM's response to Staff DR 0070, included in Highly Confidential Schedule TR-r3.

[redacted] **

Based on this demand Equivalent Forced Outage Rate ("EFORd") projection, EMM is anticipating that the ACAP for the Project will be ** [redacted] ** for both the summer and winter planning seasons, as reflected in EMM's capacity balance tables.

Q. What is the EFORd?

A. The EFORd is a factor in the Conventional Resource Performance Adjustment[12] to account for the times that a resource experienced full forced outages and startup failures when the resource otherwise would have operated if it was available. SPP's PBA methodology is discussed in more detail in Confidential Schedule TR-r2, including how new resources are treated.

Q. Is EMM's anticipated ACAP for the Project reasonable?

A. EMM must provide sufficient information to SPP to justify the projected EFORd for the Project. Assuming that EMM is able to provide the information to SPP, then the anticipated ACAP for the Project is reasonable.

Q. When is EMM's target commercial operation date for the Project?

A. EMM is targeting October 2030 for commercial operation of the Project.[13]

Q. What are Evergy Metro's capacity balances without the Project?

A. According to Evergy Metro's capacity balance tables, without the Project, Evergy Metro will have capacity deficiencies starting in ** [redacted] ** and

[12] The Conventional Resource Performance Adjustment is applied to the Net Generating Capability of a conventional resource to determine the ACAP for the resource.
[13] J Kyle Olson Direct Testimony Page 4, line 21.

** [redacted] **. Figures 1 and 2 illustrate Evergy Metro's capacity balances for summer and winter, respectively, including an adjustment to Evergy Metro's ACAP PRM values for Winter 2026-2027 and Winter 2027-2028.

**

[redacted]

[redacted]

**

Q. What are the ACAP PRM values used in Evergy Metro's capacity balance tables?

A. Evergy Metro's summer capacity balance tables incorporated the ACAP PRM value for Summer 2026 (7.06%)[14] published by SPP, but Evergy Metro's winter capacity balance tables did not use the ACAP PRM value for Winter 2026-2027 (15.28%)[15] published by SPP. The ACAP PRM values used in Evergy Metro's winter capacity balance tables for Winter 2026-2027 and Winter 2027-2028 were less than the ACAP PRM value published by SPP for Winter 2026-2027.

Q. What adjustment did Staff make to the ACAP PRM values?

A. In order to more accurately reflect Evergy Metro's capacity position for Winter 2026-2027 and Winter 2027-2028, Staff adjusted the ACAP PRM values to match the 15.28% value published by SPP for Winter 2026-2027.

Q. How does this adjustment impact Evergy Metro's capacity balances?

A. The adjustment to the ACAP PRM values results in a capacity shortage of approximately ** [redacted] ** for Evergy Metro in ** [redacted] **.

Q. Does Staff have any recommended conditions related to this potential capacity shortage?

A. Yes. Staff recommends that the Commission order EMM to 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).

[14] SPP ACAP PRM – Summer 2026, published September 26, 2025.
[15] SPP ACAP PRM – Winter 2026-27, published March 31, 2026.

Load Growth

Q. How much load growth is EMM anticipating?

A. Evergy, Inc.'s Annual Report states:

> In February 2026, the Evergy Companies signed electric service agreements (ESAs) with multiple large load customers to serve data centers with a projected peak steady state load of approximately 1,900 MWs. The ESAs relate to two new projects and the expansion of two separate projects previously announced. The ESAs' terms reflect the applicable provisions of the Evergy Companies' LLPS [large load power service] rate plans and the service of these large load customers, inclusive of a 5-year transitional load period, is expected to begin at dates ranging from 2026 to 2028.[16]

Of the projects referenced in Evergy, Inc.'s Annual Report, the only project in the EMM service territory is *** [redacted] ***. The total expected load for that project is *** [redacted] ***,[17] which is the customer's ESA contract capacity.[18] EMM is also expecting one non-LLPS customer to contribute ** [redacted] ** of additional load.[19] According to ramp up schedules, the LLPS customer is planned to reach its peak load by *** [redacted] ***[20] and the non-LLPS customer is planned to reach its peak load by *** [redacted] ***.[21]

Q. Would EMM need the Project if there were no large load projects in EMM's service territory?

A. No. If the large loads located in EMM's service territory were removed from Evergy Metro's forecasted peak demands used in Evergy Metro's capacity balance tables,

[16] Evergy, Inc.'s Annual Report at 40 (Form 10-K) (Feb. 18, 2026).
[17] EMM's response to Staff DR 0054, included in Highly Confidential Schedule TR-r3.
[18] EMM's response to Staff DR 0018, included in Highly Confidential Schedule TR-r3.
[19] EMM's response to Staff DR 0019, included in Highly Confidential Schedule TR-r3.
[20] EMM's response to Staff DR 0018.1, included in Highly Confidential Schedule TR-r3.
[21] EMM's response to Staff DR 0019.1, included in Highly Confidential Schedule TR-r3.

EMM would have sufficient capacity without the Project for both the summer and winter planning seasons. This is illustrated in Figures 3 and 4 where the ramp schedules for the LLPS customer and non-LLPS customer have been removed from Evergy Metro's forecasted peak demands.

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Conclusion on Need

Q. Is the Project effectively a necessity because the lack of the service is such an inconvenience?

A. Yes. EMM has already experienced load growth due to large loads, and EMM is anticipating continued load growth due to large loads. One LLPS customer has a signed ESA with EMM, which means that the customer's load can reasonably be expected to be added to EMM's system. Therefore, EMM will need additional capacity to provide service to the added load. Also contributing to EMM's need is additional load from a non-LLPS customer, SPP switching to a PBA methodology for conventional resources, and SPP splitting the PRMs for the summer and winter planning seasons. Staff's conclusion based on these factors is that the Project is effectively a necessity because the lack of service is such an inconvenience.

NATURAL GAS PIPELINE FACILITIES

Q. Please summarize the natural gas facilities necessary for the Project that have been discussed by EMM's witnesses.

A. EMM witness Mr. JP Meitner discussed that Evergy will use the same transportation pipelines, interconnection, and receipt points for Mullin Creek #1 and Mullin Creek #2.[22] EMM witness Mr. Meitner further stated that Mullin Creek #2 would utilize the same interconnection and lateral that is being developed for Mullin Creek #1.[23]

[22] JP Meitner Direct Testimony Page 6, lines 10-11.
[23] JP Meitner Direct Testimony Page 6, lines 17-18.

EMM witness Mr. J Kyle Olson discussed that "Evergy has engaged interstate, intrastate, and mid-stream natural gas pipelines to discuss infrastructure upgrades necessary to connect Mullin Creek #2 to the natural gas system."[24] EMM witness Mr. Olson further discussed that Evergy is in the late stages of precedent agreement negotiations with a pipeline company regarding natural gas pipeline infrastructure development necessary for the Project.[25] EMM witness Mr. Olson stated that once the precedent agreement is executed, the pipeline company will begin the process to develop the natural gas pipeline infrastructure, with the infrastructure ideally being in place 3-6 months ahead of the anticipated commercial operation date of the Project.[26]

Q. What natural gas pipeline facilities will be necessary for the Project?

A. ** [redacted] **[27]

Q. What entity will own the pipeline lateral serving the Project?

A. ** [redacted] **[28]

[24] J Kyle Olson Direct Testimony Page 24, lines 17-19.
[25] J Kyle Olson Direct Testimony Page 25, lines 9-11.
[26] J Kyle Olson Direct Testimony Page 25, lines 14-16.
[27] EMM's response to Staff DR 0037, included in Highly Confidential Schedule TR-r3.
[28] EMM's response to Staff DR 0037, included in Highly Confidential Schedule TR-r3.

Q. Did Evergy consider owning and operating the pipeline lateral that will serve the Project?

A. EMM stated:

** [redacted] **[29]

Q. Will Evergy have exclusive access to the pipeline lateral that will serve the Project?

A. EMM stated that ** [redacted] . **[30]

Q. When will the precedent agreement be finalized and executed for the pipeline lateral that will serve the Project?

A. EMM estimates that the precedent agreement will be finalized by ** [redacted] . **[31]

Q. Should EMM be required to provide the finalized and executed precedent agreement?

[29] EMM's response to Staff DR 0037.1, included in Highly Confidential Schedule TR-r3.
[30] EMM's response to Staff DR 0037.1, included in Highly Confidential Schedule TR-r3.
[31] EMM's response to Staff DR 0038, included in Highly Confidential Schedule TR-r3.

A. Yes. Staff recommends that the Commission order that 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.

Q. How does EMM plan to address any natural gas supply issues for the Project?

A. EMM is planning for the Project to include a liquid fuel tank sized for 48 hours at full load, and fuel unloading stations. EMM intends for the liquid fuel capability to provide a safeguard to allow the Project to operate during natural gas supply disruptions.[32] Staff witness Shawn E. Lange, PE discusses Staff's recommended conditions related to fuel supply reporting.

EMM STATUS REPORTS

Q. What periodic reports does EMM plan on providing regarding the Project?

A. EMM plans to submit quarterly project status updates that will address schedule, cost, and key risk items.[33]

Q. What recommendations do Staff have for quarterly progress reports for the Project?

A. Staff recommends that the Commission order the following quarterly reporting conditions:

[32] J Kyle Olson Direct Testimony Page 25, lines 18-21.
[33] J Kyle Olson Direct Testimony Page 27, lines 10-12.

- EMM shall file in this docket or in 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.
- 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.
- 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.

Q. Is there any other information that EMM should file in this docket or a compliance docket?

A. Yes. EMM witness Mr. Olson discussed the engineer, procure, and construct ("EPC") contractor and contract for the Project in his direct testimony, including that "Evergy is using the same EPC contract framework and materially the same commercial and risk-allocation terms for Mullin Creek #2 as were negotiated

and executed for Mullin Creek #1."[34] In response to Staff DR 0034, included in Highly Confidential Schedule TR-r3, EMM stated that ** [redacted]. ** EMM added, ** [redacted]. **

Q. What is Staff's recommendation for additional information that EMM should file in this docket or a compliance docket?

A. Staff recommends that the Commission order that 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.

VARIANCE REQUESTS

Q. What variance requests did EMM include in its Application for the Project?

A. In its Application, EMM requested variances from 20 CSR 4240-20.045(3)(C),[35] (6)(I),[36] and (6)(J).[37] EMM stated that it would provide more detailed operations and maintenance plans as well as its plans for the restoration of safe

[34] J Kyle Olson Direct Testimony Page 17, lines 9-11.
[35] 20 CSR 4240-20.045(3)(C) requires that if any of the items required by 20 CSR 4240-20.045 are unavailable at the time that an application for a CCN pursuant to section 393.170.1 and 2., RSMo, is filed, the unavailable items may be filed prior to the granting of authority by the Commission, or the Commission may grant the CCN subject to the condition that the unavailable items be filed before authority under the certificate is exercised.
[36] 20 CSR 4240-20.045(6)(I) requires that an application for authorization to construct an asset under section 393.170.1, RSMo shall include an overview of plans for operating and maintaining an asset.
[37] 20 CSR 4240-20.045(6)(J) requires that an application for authorization to construct an asset under section 393.170.1, RSMo shall include an overview of plans for restoration of safe and adequate service after significant, unplanned/forced outages of an asset.

and adequate service when they are available closer to the Project's commercial operation date.[38]

Q. Have there been similar variance requests in CCN cases for simple cycle gas turbines ("SCGT")?

A. Yes. There were similar variance requests in Commission Case Nos. EA-2025-0238 and EA-2025-0299.

Q. What did Staff recommend for the variance requests in those cases?

A. Staff recommended that the Commission grant the requested variances, with conditions.

Q. What does Staff recommend that the Commission order regarding EMM's variance requests in this case?

A. Staff recommends that the Commission grant EMM the requested variances from 20 CSR 4240-20.045(6)(I) and (6)(J) with the following conditions:

- 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.
- 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

[38] Paragraphs 21 and 22 of EMM's Application.

and adequate service after significant, unplanned/forced outages no later than sixty (60) days after the Project is placed in-service.

CONCLUSION

Q. Please summarize your rebuttal testimony.

A. I discussed the need for the Project and concluded that the Project is needed to provide service to large load additions in EMM's service territory. SPP's changes to conventional resource accreditation and PRMs also contributed to EMM's need for the Project. I also discussed the natural gas pipeline facilities that are necessary for the Project, including that a precedent agreement for the pipeline lateral to serve the Project has yet to be finalized and executed. I further discussed information that should be included in EMM's quarterly project updates. Finally, I discussed EMM's variance requests and that the variance requests should be granted, with conditions.

Q. What conditions discussed in your rebuttal testimony does Staff recommend the Commission order with any approval of a CCN for the Project?

A. Staff recommends that the Commission order the following conditions with any approval of a CCN for the Project:

- 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).
- 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.

- 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.
- 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.
- EMM shall file in this docket or in 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.
- 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.

- 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.
- 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.

Q. Does this conclude your rebuttal testimony?

A. Yes.

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 TREVOR RUCKER

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW TREVOR RUCKER and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of Trevor Rucker*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

TREVOR RUCKER

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.

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

Educational and Employment Background and Credentials
of
Trevor Rucker

I earned a Bachelor of Science in Nuclear Engineering with a minor in Mathematics from the Missouri University of Science and Technology in May 2017, and a Master of Business Administration with a concentration in Management from Maryville University in December 2019. I am registered as an Engineer Intern in Missouri. I began employment at the Missouri Public Service Commission ("Commission") in June 2018 as a Utility Operations Technical Specialist in the Water & Sewer Department. I was promoted to a Utility Engineering Specialist (renamed to Associate Engineer) in the Safety Engineering Department in December 2018. I transferred to the Engineering Analysis Department in May 2025 as an Associate Engineer, and I was promoted to a Senior Project Manager in the same department in August 2026.

The following is a listing of cases before the Commission in which I have previously provided testimony or analysis through affidavits:

Company	Case Number	Filing Description	EFIS Date Filed
Missouri-American Water Company	WC-2019-0004	Staff Report	10/5/2018
Missouri-American Water Company	WM-2019-0018	Staff Recommendation	11/16/2018
Roeslein Alternative Energy Services, LLC	GE-2020-0238	Staff Recommendation	4/7/2020
Spire Missouri, Inc.	GC-2021-0135	Staff Report	2/26/2021

Company	Case Number	Filing Description	EFIS Date Filed
City of New Florence, Missouri	GS-2017-0324	Progress Report	12/19/2022
Spire Missouri, Inc.	GS-2022-0047	Staff Report	11/15/2023
Spire Missouri, Inc.	GS-2022-0047	Staff's Reply	2/1/2024
Spire Missouri, Inc.	GC-2024-0260	Staff's Response	12/9/2024
Summit Natural Gas of Missouri, Inc.	GS-2025-0197	Incident Report	1/6/2025
Empire District Electric Company d/b/a Liberty	EC-2026-0048	Staff Report	11/14/2025
Union Electric Company d/b/a Ameren Missouri	EA-2025-0238	Staff Rebuttal Report	12/12/2025
Union Electric Company d/b/a Ameren Missouri	EA-2025-0238	Surrebuttal Testimony	1/16/2026
Evergy Metro Inc., d/b/a Evergy Missouri Metro	EC-2026-0064	Staff Report	1/30/2026
Union Electric Company d/b/a Ameren Missouri	EC-2026-0156	Staff Report	3/13/2026
Empire District Electric Company d/b/a Liberty	EA-2025-0299	Staff Rebuttal Report	5/7/2026
Evergy Metro Inc., d/b/a Evergy Missouri Metro	ER-2026-0143	Direct Testimony	6/30/2026
Evergy Metro Inc., d/b/a Evergy Missouri Metro	ER-2026-0143	Surrebuttal / True-Up Direct Testimony	9/10/2026

SPP Accredited Capacity Determination

Section 3.1 of Southwest Power Pool ("SPP") Open Access Transmission Tariff ("OATT") Business Practice 8400, revision date 05/05/2026, shows that the accredited capacity ("ACAP") for a conventional resource is determined by using Equations 1 and 2.

Equation 1

$$ACAP = Net\ Generating\ Capability^{1}\ X\ (1 - Conventional\ Resource\ Performance\ Adjustment^{2})$$

Equation 2

$$Conventional\ Resource\ Performance\ Adjustment$$

$$= EFORd + (EFOF\ X\ Incremental\ Outage\ Impact^{3}\ /\ total\ system\ EFOF\ impact)$$

The EFORd is the demand Equivalent Forced Outage Rate and EFOF is the Equivalent Forced Outage Factor. The EFORd accounts for the times that a resource experienced full forced outages and startup failures when the resource otherwise would

[1] Net Generating Capability is defined in Attachment AA of SPP's OATT, effective date 4/1/2026, as "A resource's gross maximum output sustained over a one-hour period, demonstrated with a capability test, reduced by any power used for unit auxiliaries, and modified for environmental, seasonal, operational, and fuel limitations. For resources qualified as internal to the SPP Balancing Authority Areas, the resources shall meet the testing requirements in accordance with the SPP Planning Criteria. Resources qualified as external to the SPP Balancing Authority Areas shall adhere to the testing requirements of the Balancing Authority where the resource(s) is located."

[2] Conventional Resource Performance Adjustment is defined in Attachment AA of SPP's OATT, effective date 4/1/2026, as "The historical performance adjustment for conventional resources using the combination of a modified demand Equivalent Forced Outage Rate ("EFORd") method and Equivalent Forced Outage Factor ("EFOF") method adjusted for Incremental Outage Impact in accordance with this Attachment AA and the SPP Business Practices. A resource's EFOF shall only be considered during the Winter Season. Conventional resources are defined as thermal fuel type resources, pump storage hydroelectric resources, and hydroelectric resources with reservoir storage capability not subject to hourly river flow limitations similar to run-of-river hydro."

[3] Incremental Outage Impact ("IOI") is defined in Attachment AA of SPP's OATT, effective date 4/1/2026, as "The incremental impact of simultaneous conventional resource forced outages in excess of the normally modeled forced outages experienced during timeframes of extreme temperatures from the LOLE Study. This value shall be assessed in accordance with the LOLE Study scope and SPP Business Practices. Incremental Outage Impact shall only be considered during the Winter Season."

have operated if it was available. The EFOF accounts for the times that a resource experienced full forced outages and startup failures when the resource otherwise would have operated if it was available during the top 3% of Adjusted Net Peak Load[4] for the applicable planning season. The EFOF component of the Conventional Resource Performance Adjustment is only applicable to the winter planning season.

Section 3.8 of SPP OATT Business Practice 8400, revision date 5/5/2026, covers Conventional Resource Performance Adjustments for new resources. Section 3.8.2 states that the class average EFORd will be used for years where historical data does not yet exist for new resources. The resource's design performance projections (EFORd projections) may be used in lieu of the class average EFORd. EMM[5] is using an EFORd projection of ** [redacted] ** for the Mullin Creek #2 Project ("Project") for capacity accreditation methodology.[6] EMM added that it expects that the Project will be accredited for the design capability which has an expected EFORd of ** [redacted] **.[7] Section 3.8.3 states that newly constructed resources will be assigned an initial EFOF value of 0%, with the initial EFOF value being phased as historical data is available. Using the nameplate capacity of the Project of 440 MW as the Net Generating Capability, the EFORd projection used by EMM, and the initial EFOF value results in an ACAP of ** [redacted] ** for the Project.

[4] Adjusted Net Peak Load is defined in Attachment AA of SPP's OATT, effective date 4/1/2026, as "The Net Peak Load less the a) actual production output of all wind resources in the applicable SPP Balancing Authority Area and b) actual production output of all solar resources in the applicable SPP Balancing Authority Area." Net Peak Load is defined in Attachment AA of SPP's OATT, effective date 4/1/2026, as "The actual Peak Demand less the actual impacts of a Demand Response Program."
[5] Evergy Metro Inc., Evergy Missouri Metro ("EMM").
[6] EMM response to Staff Data Request 0049, included in Highly Confidential Schedule TR-r3.
[7] EMM response to Staff Data Request 0027.2, included in Highly Confidential Schedule TR-r3.

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENGINEERING ANALYSIS DEPARTMENT

REBUTTAL TESTIMONY OF

TREVOR RUCKER

Highly Confidential Schedule TR-r3

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 ***

Case No. EA-2026-0154

SCHEDULE TR-r3

Pages 1 and 2

HAVE BEEN DEEMED

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Case No. EA-2026-0154

SCHEDULE TR-r3

Pages 3 and 4

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Case No. EA-2026-0154

SCHEDULE TR-r3

Pages 5 and 6

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Case No. EA-2026-0154

SCHEDULE TR-r3

Pages 7 and 8

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Case No. EA-2026-0154

SCHEDULE TR-r3

Pages 9 through 20

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Case No. EA-2026-0154

SCHEDULE TR-r3

Pages 21 through 25

HAVE BEEN DEEMED

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Evergy Missouri Metro
Case Name: 2026 EMM CCN Mullin Creek 2
Case Number: EA-2026-0154

Requestor Eubanks Claire -
Response Provided September 04, 2026

Question:0070
(1) Please provide Evergy Metro's preferred plan, depicted on Figure 1, page 4 of the Direct Testimony of Cody Vande Velde separately for Evergy Missouri Metro and Evergy Kansas Metro.
(2) Please explain in detail how Evergy Metro plans separately for its Missouri and Kansas jurisdictions. Specifically explain how Evergy Metro separates for each jurisdiction the following analysis components: resource acquisition strategy selection; integrated resource plan and risk analysis; demand-side resource analysis; transmission and distribution analysis; supply-side resource analysis; and load analysis and load forecasting. DR by Claire Eubanks (claire.eubanks@psc.mo.gov).

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC
Statement: This response is Public. No Confidential Statement is needed.

Response:

(1) Evergy Metro's IRP modeling and Preferred Plan selection are done at the consolidated Metro level. Evergy Metro does not have a separate preferred plan for Evergy Missouri Metro and Evergy Kansas Metro. However, Evergy Metro is proposing to allocate the near-term resources directly to either Missouri Metro or Kansas Metro. Specifically, Evergy Metro is proposing the Thermal units in 2031 and 2032 be allocated to Missouri Metro and the solar resource in 2028 and battery resource in 2030 be allocated to Kansas Metro.
(2) Demand-side resource analysis and load forecasting are performed at each separate Metro state jurisdiction. The results of these processes are then aggregated to the consolidated Metro level for purposes of resource acquisition strategy selection, integrated resource plan and risk analysis, supply-side resource analysis, and transmission and distribution analysis.

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Information provided by:
Cody VandeVelde, Sr. Dir. Strategy & Long-term Planning

Attachment(s):

Missouri Verification:
I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs

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