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Exhibit No. 108

Staff – Exhibit 108
Rebuttal Testimony of David M. Sommerer
Case No. EA-2026-0154

Exhibit No.:	
Issue(s):	*Gas Procurement*
Witness:	*David M. Sommerer*
Sponsoring Party:	*MoPSC Staff*
Type of Exhibit:	*Rebuttal Testimony*
Case No.:	*EA-2026-0154*
Date Testimony Prepared:	*September 15, 2026*

MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL AND BUSINESS ANALYIS DIVISION

PROCUREMENT ANALYSIS DEPARTMENT

REBUTTAL TESTIMONY

OF

DAVID M. SOMMERER

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

DAVID M. SOMMERER

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 David Sommerer, 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 Regulatory Compliance Manager in the Procurement Analysis Department of the Financial and Business 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 affidavits is attached as Schedule DMS-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 topic of natural gas procurement. Specifically, this testimony responds to the Direct Testimony of EMM Witness JP Meitner. It should be

noted that Staff Witness Trevor Rucker has discussed in his Rebuttal Testimony the topic of Natural Gas Pipeline Facilities. That testimony should be read in connection with my testimony here, since the issues of natural gas procurement and natural gas pipeline facilities are interrelated.

Q. What overall comment do you have regarding Mr. Meitner's Direct Testimony?

A. As was the case with Mullin Creek #1, the status of EMM's gas procurement approach remains somewhat uncertain. This is in part due to the fact that the gas procurement plans are still evolving and are still in the development phase. EMM has provided updates regarding preliminary gas hedging approaches, however the final decision regarding interstate and intrastate transportation agreements is less clear.

Q. Will the Company be using the same gas procurement approach for the simple cycle Mullin Creek #1 and #2 units as its plans for the combined cycle units that were the primary subject of Case No. EA-2025-0075?

A. In general, no. The gas procurement plans for Mullin Creek #1 and #2 are discussed at a high level on page 7 and page 9 of Mr. Meitner's Direct Testimony. A key difference between the combined cycle units that were the subject of EA-2025-0075 and the Mullin Creek #1 and #2 units is the dual fuel capabilities of the simple cycle units. The concept appears to be that the need for firm interstate

pipeline transportation is greatly lessened by the availability of the liquid fuel tanks that were "sized for 48 hours at full load".[1]

Q. What are your primary concerns from a gas procurement standpoint?

A. Those concerns can be summarized by a simple statement that was made by Mr. Meitner in his Direct Testimony that "[t]he precedent agreement from the competitive process used for Mullin Creek #1 is still being negotiated".[2]

Q. Can you summarize your understanding as to where the acquisition of firm transportation stands for the Mullin Creek #1 and #2 projects?

A. Yes. **

[1] JP Meitner Direct Testimony page 10, lines 4-5.
[2] JP Meitner Direct Testimony page 9, lines 20-21.

[redacted]

[3] EMM's confidential response to Staff Data Request No. 0037 part C.

[4] ** [redacted] **

[redacted] **

Q. ** [redacted]

[redacted] **

A. ** [redacted]

[redacted] **

Q. Do you have any recommendations regarding natural gas procurement?

A. Yes, Consistent with Staff Witness Rucker's testimony, EMM should submit into this docket or a new docket, all interstate and intrastate pipeline precedent and transportation agreements. In addition, the Company should complete plans for ensuring the delivery, storage, and uploading of the liquid fuel back-up. Finally, the Company should evaluate contingency plans in the event that ** [redacted] . **

CONCLUSION

Q. Please summarize your rebuttal testimony.

A. Overall, I reviewed EMM's plans for gas procurement and the status of the gas supply and hedging plans. I reviewed those plans with a focus on Mullin Creek #1 and Mullin Creek #2 since those plants share many of the same characteristics and

upstream (prior to natural gas deliver to the plants) needs. There is still a great deal of uncertainty regarding final gas procurement and hedging plans with regard to Mullin Creek #1 and Mullin Creek #2. I have provided three (3) recommendations, just prior to this summary. Staff recommends these recommendations be ordered as conditions to any CCN granted in this case.

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 DAVID M. SOMMERER

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW DAVID M. SOMMERER and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of David M. Sommerer*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

David M. Sommerer
DAVID M. SOMMERER

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

David M. Sommerer

Educational Background and Work Experience

In May 1983, I received a Bachelor of Science degree in Business and Administration with a major in Accounting from Southern Illinois University at Carbondale, Illinois. In May 1984, I received a Master of Accountancy degree from the same university. Also, in May 1984, I sat for and passed the Uniform Certified Public Accountants examination. I am currently a licensed CPA in Missouri. Upon graduation, I accepted employment with the Commission.

From 1984 to 1990 I assisted with audits and examinations of the books and records of public utilities operating within the state of Missouri. In 1988, the responsibility for conducting the Actual Cost Adjustment (ACA) audits of natural gas utilities was given to the Accounting Department. I assumed responsibility for planning and implementing these audits and trained available Staff on the requirements and conduct of the audits. I participated in most of the ACA audits from early 1988 to early 1990. On November 1, 1990, I transferred to the Commission's Energy Department. Until November of 1993, my duties consisted of reviews of various tariff proposals by electric and gas utilities, Purchased Gas Adjustment (PGA) reviews, and tariff reviews as part of a rate case. In November of 1993, I assumed my present duties of managing a newly created department called the Procurement Analysis Department. This Department was created to more fully address the emerging changes in the gas industry especially as they impacted the utilities' recovery of gas costs. My duties have included managing the Procurement Analysis staff, reviewing ACA audits and recommendations, participating in the gas integrated resource planning project, serving on the gas project team, serving on the natural gas commodity price task force, and participating in matters relating to natural gas

service in the state of Missouri. In July of 2006, the Federal Issues/Policy Analysis Section was transferred to the Procurement Analysis Department. That group analyzes filings made before the Federal Energy Regulatory Commission (FERC). During the reorganization in August 2011, the Federal Issues/Policy Analysis Section was transferred to the Secretary/ General Counsel Division. In 2015, I assumed the responsibility for the rate design aspects of the Gas Infrastructure System Replacement Surcharge (ISRS) process. The Gas ISRS allows for a more expedited process of including eligible pipeline replacements in rates prior to general rate cases. In April of 2021, I participated in the development of Staff's Report in the Cold Weather Event Investigation Case No. AO-2021-0264.

CASES WHERE TESTIMONY

WAS FILED

DAVID M. SOMMERER

COMPANY	CASE NO.	ISSUES
Spire Inc.	GA-2026-0121	Renew Natural Gas PGA
Evergy Missouri	EA-2025-0075	Natural Gas Procurement
Spire Inc.	GC-2024-0172	Customer Complaint
Spire West	GR-2022-0136	Off-system Sales
Summit Natural Gas of Missouri	GR-2022-0122	PGA/ACA Carrying Costs
Summit Natural Gas of Missouri	GC-2022-0158	Ozark Healthcare Complaint
Spire East/West	GR-2021-0108	PGA/ACA Consolidation, Seasonal PGA
Spire East	GO-2019-0356	ISRS rates
Spire West	GO-2019-0357	ISRS rates
Spire East	GO-2019-0115	ISRS rates
Spire West	GO-2019-0116	ISRS rates
Spire East	GO-2018-0309	ISRS rates
Spire West	GO-2018-0310	ISRS rates
Missouri Gas Energy	GO-2017-0201	ISRS rates
Laclede Gas Company	GO-2017-0202	ISRS rates
Missouri Gas Energy	GR-2017-0216	Gas Inventory Carrying Cost and Service Agreements
Laclede Gas Company	GR-2017-0215	Gas Inventory Carrying Cost and Service Agreements
Laclede Gas Company	GO-2016-0333	ISRS rates

COMPANY	CASE NO.	ISSUES
Missouri Gas Energy	GO-2016-0332	ISRS rates
Laclede Gas Company (MGE)	GO-2016-0197	ISRS rates
Laclede Gas Company	GO-2016-0196	ISRS rates
Liberty Utilities (Midstates Natural Gas) Corp., d/b/a Liberty Utilities	GR-2014-0152	Special Contact Customers Gas Contract
Missouri Gas Energy	GR-2014-0007	Gas Supply Incentive Plan Property Tax PGA Recovery
Laclede Gas Company	GR-2010-0171	Bad Debt in PGA, CAM
Atmos Energy Corporation	GR-2009-0417	Affiliated Transactions
Atmos Energy Corporation	GR-2008-0364	Affiliated Transactions
Missouri Gas Energy	GR-2009-0355	PGA tariff
Laclede Gas Company	GT-2009-0026	Tariff Proposal, ACA Process
Missouri Gas Utility	GR-2008-0060	Carrying Costs
Laclede Gas Company	GR-2007-0208	Gas Supply Incentive Plan, Off-system Sales, Capacity Release
Laclede Gas Company	GR-2005-0284	Off-System Sales/GSIP
Laclede Gas Company	GR-2004-0273	Demand Charges
AmerenUE	EO-2004-0108	Transfer of Gas Services
Aquila, Inc.	EF-2003-0465	PGA Process, Deferred Gas Cost
Missouri Gas Energy	GM-2003-0238	Pipeline Discounts, Gas Supply
Laclede Gas Company	GT-2003-0117	Low-Income Program
Laclede Gas Company	GR-2002-356	Inventory, Off-System Sales
Laclede Gas Company	GR-2001-629	Inventory, Off-System Sales

COMPANY	CASE NO.	ISSUES
Laclede Gas Company	GR-2001-387	ACA Price Stabilization
Missouri Gas Energy	GR-2001-382	ACA Hedging/Capacity Release
Laclede Gas Company	GT-2001-329	Incentive Plan
Laclede Gas Company	GO-2000-394	Price Stabilization
Laclede Gas Company	GT-99-303	Incentive Plan
Laclede Gas Company	GC-99-121	Complaint PGA
Laclede Gas Company	GR-98-297	ACA Gas Cost
Laclede Gas Company	GO-98-484	Price Stabilization
Laclede Gas Company	GR-98-374	PGA Clause
Missouri Gas Energy	GC-98-335	Complaint Gas Costs
United Cities Gas Company	GO-97-410	PGA Clause
Missouri Gas Energy	GO-97-409	PGA Clause
Missouri Gas Energy	GR-96-450	ACA Gas Costs
Missouri Public Service	GA-95-216	Cost of Gas
Missouri Gas Energy	GO-94-318	Incentive Plan
Western Resources Inc.	GR-93-240	PGA tariff, Billing Adjustments
Union Electric Company	GR-93-106	ACA Gas Costs
United Cities Gas Company	GR-93-47	PGA tariff, Billing Adjustments
Laclede Gas Company	GR-92-165	PGA tariff
United Cities Gas Company	GR-91-249	PGA tariff

COMPANY	CASE NO.	ISSUES
United Cities Gas Company	GR-90-233	PGA tariff
Associated Natural Gas Company	GR-90-152	Payroll
KPL Gas Service Company	GR-90-50	Service Line Replacement
KPL Gas Service Company	GR-90-16	ACA Gas Costs
KPL Gas Service Company	GR-89-48	ACA Gas Costs
Great River Gas Company	GM-87-65	Lease Application
Grand River Mutual Tel. Company	TR-87-25	Plant, Revenues
Empire District Electric Company	WR-86-151	Revenues
Associated Natural Gas Company	GR-86-86	Revenues, Gas Cost
Grand River Mutual Telephone	TR-85-242	Cash Working Capital
Great River Gas Company	GR-85-136	Payroll, Working Capital
Missouri-American Water Company	WR-85-16	Payroll