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Missouri Public
Service Commission

Exhibit No. 38

Evergy Missouri Metro – Exhibit 38
True-Up Rebuttal Testimony of Graham A. Jaynes
Case No. ER-2026-0143

Exhibit No.:	
Issue:	Retail Revenues
Witness:	Graham A. Jaynes
Type of Exhibit:	True-Up Rebuttal Testimony
Sponsoring Party:	Evergy Missouri Metro
Case No.:	ER-2026-0143

Date Testimony Prepared: September 23, 2026

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2026-0143

TRUE-UP REBUTTAL TESTIMONY

OF

GRAHAM A. JAYNES

ON BEHALF OF

EVERGY MISSOURI METRO

Kansas City, Missouri
September 2026

TRUE-UP REBUTTAL TESTIMONY

OF

GRAHAM A. JAYNES

Case No. ER-2026-0143

Q. Please state your name and business address.

A. Graham A. Jaynes. My business address is 1200 Main, Kansas City, Missouri 64105.

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

A. I am employed by Evergy Metro, Inc. and serve as Manager - Regulatory Affairs for Evergy Metro, Inc. d/b/a as Evergy Missouri Metro ("EMM"), Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("EMW" or "Company"), Evergy Metro, Inc. d/b/a Evergy Kansas Metro ("EKM"), and Evergy Kansas Central, Inc. and Evergy South, Inc., collectively d/b/a as Evergy Kansas Central ("EKC") the operating utilities of Evergy, Inc.

Q. Are you the same Graham A. Jaynes who previously filed direct, rebuttal, surrebuttal, and true-up direct testimony in this case?

A. Yes.

Q. On whose behalf are you testifying?

A. I am testifying on behalf of EMM ("Evergy" or the "Company").

Q. What is the purpose of your testimony?

A. The purpose of my true-up rebuttal testimony is to discuss the LLPS retail revenue annualization methodology of OPC witness Ron Nelson.

Q. How did Mr. Nelson adjust LLPS revenues?

A. OPC witness Nelson adjusted LLPS revenues to account for [redacted]**

Q. What evidence did Mr. Nelson provide demonstrating that **[redacted] is the appropriate annual revenue adjustment?**

A. In the portions of Mr. Nelson's surrebuttal testimony addressing this adjustment, I did not identify a calculation or supporting analysis demonstrating how the **[redacted]** amount was derived.

Q. What amount of LLPS revenue adjustment is appropriate?

A. Consistent with my testimony filed within this case, known and measurable information at true-up should be utilized to adjust Customer A revenues. As described in my true-up direct testimony, Customer A revenues at June 2026 were annualized (multiplied by 12) amounting to **[redacted]** total. This is based on the highest observed bill as of true-up. Extending the adjustment beyond that observed level would rely on forecasted operating conditions for a period several years after rates become effective. This is neither appropriate nor justified by the record in this case.

Q. Does this conclude your true-up rebuttal testimony?

A. Yes, it does.

CONFIDENTIAL

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's Request for Authority to Implement A General Rate Increase for Electric Service	))))	Case No. ER-2026-0143

AFFIDAVIT OF GRAHAM A. JAYNES

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Graham A. Jaynes, being first duly sworn on his oath, states:

1. My name is Graham A. Jaynes. I work in Kansas City, Missouri and I am employed by Evergy Metro, Inc. as Manager – Regulatory Affairs.

2. Attached hereto and made a part hereof for all purposes is my True-Up Rebuttal Testimony on behalf of Evergy Missouri Metro consisting of two (2) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

Graham A. Jaynes

Subscribed and sworn before me this 23rd day of September 2026.

Notary Public

My commission expires: April 26, 2029

ANTHONY R WESTENKIRCHNER
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 26, 2029
PLATTE COUNTY
COMMISSION #17279952

Evergy Metro, Inc. d/b/a Evergy Missouri Metro

Docket No.: ER-2026-0143
Date: September 23, 2026

CONFIDENTIAL INFORMATION

The following information is provided to the Missouri Public Service Commission under CONFIDENTIAL SEAL:

Document/Page	Reason for Confidentiality from List Below
Jaynes True-Up Rebuttal, p. 2, lns 2-4, 7, and 13.	3 and 6

Rationale for the "confidential" designation pursuant to 20 CSR 4240-2.135 is documented below:

1. Customer-specific information;

2. Employee-sensitive personnel information;

3. Marketing analysis or other market-specific information relating to services offered in competition with others;

4. Marketing analysis or other market-specific information relating to goods or services purchased or acquired for use by a company in providing services to customers;

5. Reports, work papers, or other documentation related to work produced by internal or external auditors, consultants, or attorneys, except that total amounts billed by each external auditor, consultant, or attorney for services related to general rate proceedings shall always be public;

6. Strategies employed, to be employed, or under consideration in contract negotiations;

7. Relating to the security of a company's facilities; or

8. Concerning trade secrets, as defined in section 417.453, RSMo.

9. Other (specify) _____.

Should any party challenge the Company's assertion of confidentiality with respect to the above information, the Company reserves the right to supplement the rationale contained herein with additional factual or legal information.