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# Exhibit No. 70

Evergy Missouri Metro – Exhibit 70
Surrebuttal Testimony of Ryan Mulvany
Case No. ER-2026-0143

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| Issue: | Operations, Distribution, & Transmission Costs; Storm Reserve |
| Witness: | Ryan Mulvany |
| Type of Exhibit: | Surrebuttal Testimony |
| Sponsoring Party: | Evergy Missouri Metro |
| Case No.: | ER-2026-0143 |
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**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO.: ER-2026-0143**

# SURREBUTTAL TESTIMONY

**OF**

**RYAN MULVANY**

**ON BEHALF OF**

**EVERGY MISSOURI METRO**

**Kansas City, Missouri**

**September 2026**

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**SURREBUTTAL TESTIMONY**

**OF**

**RYAN MULVANY**

**Case No. ER-2026-0143**

## I. INTRODUCTION

**Q: Please state your name and business address.**

A: My name is Ryan P. Mulvany. 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 Vice President Distribution – Power Delivery Administration for Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("Evergy Missouri Metro," "EMM," or the "Company"), Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West"), Evergy Metro, Inc. d/b/a Evergy Kansas Metro ("Evergy Kansas Metro"), and Evergy Kansas Central, Inc. and Evergy South, Inc., collectively d/b/a Evergy Kansas Central ("Evergy Kansas Central") the operating utilities of Evergy, Inc. ("Evergy").

**Q: Are you the same Ryan P. Mulvany who previously filed direct and rebuttal testimony in this case?**

A: Yes.

**Q: Who are you testifying for?**

A: I am testifying on behalf of Evergy Missouri Metro.

**Q: What is the purpose of your testimony?**

A: The purpose of my surrebuttal testimony is to respond to Staff Witness Malachi Bowman.

## II. VEGETATION MANAGEMENT COMPLIANCE

**Q: Has Evergy historically administered its Missouri vegetation management program on a combined Missouri basis?**

A: Yes. Evergy Missouri Metro and Evergy Missouri West have historically managed vegetation management activities as an integrated Missouri vegetation management program consistent with Commission reporting practices and oversight.

**Q: Mr. Bowman's testimony states that EMM is not in compliance with Commission Rule 20 CSR 4240-23.030(9)(A)5.[1] Do you agree with this statement?**

A: No. Mr. Bowman's conclusion is based on a different interpretation of how the vegetation management requirements in the rule should be applied to EMM and EMW. Historically, Evergy has administered and reported its Missouri vegetation management activities as a single, integrated Missouri vegetation management program. As a result, the Company's compliance and reporting practices have reflected the combined operation of its Missouri service territories rather than separate evaluations for EMM and EMW.

**Q: Has Evergy disclosed this operating approach to the Commission?**

A: Yes. Evergy's vegetation management activities have been reported to the Commission through annual vegetation management reports since 2009. Consistent with the Company's longstanding practice of managing vegetation activities on a combined basis, the annual reports submitted to the Commission over the 17 years reflect vegetation management activities in both EMM and EMW.

[1] See M. Bowman Rebuttal at 7.

**Q: Does the Commission's vegetation management rule 20 CSR 4240-23.030 expressly prohibit managing vegetation resources across affiliated Missouri service territories?**

A: No. The rule establishes minimum vegetation management requirements, but it does not expressly prohibit integrated planning and deployment of vegetation management resources across affiliated utility operating companies.

**Q: Has Commission Staff recommended Evergy change its vegetation management reporting practices?**

A: No.

**Q: In the past 17 years, has Commission Staff ever questioned Evergy's practice of integrated planning a deployment of vegetation management across Evergy Missouri West and Evergy Missouri Metro?**

A: Yes. Staff raised a similar concern in Evergy Missouri West's most recent rate case, No. ER-2024-0189. In that proceeding, Staff observed that annual vegetation management completion percentages varied between EMM and EMW when viewed separately and expressed concerns regarding compliance. In response, I explained the Company's longstanding practice of administering vegetation management activities on a combined Missouri basis.

**Q: Did Evergy change its vegetation management approach following that case?**

A: No. Evergy has continued to administer the vegetation management program using the same framework.

**Q: Has Evergy met the overall vegetation management objectives contemplated by the Commission's rule?**

A: Yes. Evergy's integrated vegetation management program has consistently maintained compliance objectives while balancing workforce availability, customer impacts, emergent conditions, and risk priorities.

**Q: Why might annual mileage percentages differ between EMM and EMW in a given year?**

A: Annual mileage variation among service territories may be influenced by a wide number of variables: such as vegetation growth rates, weather impacts, circuit exposure, customer needs, and workforce productivity. Additionally, operational and logistical constraints, such as workforce availability, contractor staffing levels, regional labor market conditions, and crew mobilization requirements may contribute to year-to-year variation in completed mileage between EMM and EMW.

**Q: Does a deviation in a single year's percentage necessarily indicate inadequate vegetation management or increased reliability risk?**

A: No. While vegetation is an important contributor to reliability performance and a significant cause of outages, a deviation in a single year's percentage does not, by itself, demonstrate inadequate vegetation management. Reliability performance depends on many factors, including weather, equipment condition, customer density, vegetation exposure, and storm activity. Annual vegetation percentages alone do not establish a causal relationship with reliability outcomes.

**Q: What is your response to Mr. Bowman's recommendation regarding vegetation management compliance?**

A: Evergy has openly administered and reported its integrated Missouri vegetation management program through a longstanding operational and reporting framework that has

been disclosed to the Commission for 17 years. The operational practices identified by Mr. Bowman are not new and were previously discussed in No. ER-2024-0189. Accordingly, the issue raised by Mr. Bowman is not the discovery of a previously undisclosed vegetation management practice, but rather a difference in interpretation regarding how the Commission's vegetation management requirements should be applied to EMM and EMW. The Company's administration and reporting of its integrated Missouri vegetation management program have been transparent, consistent, and well-established since the inception of Commission Rule 20 CSR 4240-23.030.

## III. RELIABILITY AND DISTRIBUTION INVESTMENT

**Q: Does Staff acknowledge that equipment-related outages are the largest outage category on the EMM system?**

A: Yes. Staff's rebuttal testimony identifies equipment-related outages as the largest outage cause category.

**Q: What does that imply regarding the importance of asset replacement and infrastructure investment?**

A: It confirms that infrastructure replacement programs address the largest identified source of customer outages and therefore remain an important component of reliability improvement efforts.

**Q: Can vegetation management alone address equipment failures associated with aging assets?**

A: No. Vegetation management and asset replacement address different reliability risks. While vegetation management is an important component of maintaining system reliability, it cannot address the deterioration of conductors, poles, transformers, or other

aging infrastructure. As discussed previously, EMM's outage data shows that equipment failure-related outages are the leading cause of customer interruptions during normal, blue-sky operating conditions. As a result, a vegetation management program cannot eliminate reliability risks associated with aging equipment.

**Q: Does Evergy view vegetation management and equipment replacement as competing strategies?**

A: No. They are complementary reliability tools. Maintaining and improving reliability requires both prudent vegetation management practices and targeted investments to replace aging infrastructure before failure occurs.

**Q: Has Evergy discontinued or reduced its vegetation management program in order to fund distribution modernization programs?**

A: No. Evergy continues to invest substantially in vegetation management while simultaneously addressing aging infrastructure and reliability concerns through capital investment programs.

## IV. ASSETLENS AND PRUDENCE

**Q: Staff expresses concern that AssetLens analyses are not retained. Does AssetLens itself make investment decisions?**

A: No. AssetLens is a decision-support tool. Final investment decisions are made by experienced utility personnel using engineering judgment and multiple sources of information.

**Q: Does Evergy rely solely on AssetLens outputs when selecting projects?**

A: No. AssetLens is a tool used to help prioritize potential investment opportunities, but it is only the starting point in the project selection process. Once potential projects are

identified, engineers in the Asset Management department review the results to confirm the need remains valid and that the work has not already been completed or otherwise addressed. Asset Management then develops project-specific work orders, and field personnel conduct site visits to verify conditions, confirm scope, and identify any additional items that should be addressed. As a result, final investment decisions are informed by AssetLens analytics, engineering judgement, field verification, and project-specific considerations rather than relying solely on AssetLens outputs. Evergy witness Andy Alexander further details the Company's use of AssetLens in his rebuttal testimony.

**Q: Did Staff conclude that the investments identified through AssetLens were imprudent?**

A: No. Staff expressly states that it is not recommending disallowance of those investments and that additional evidence would be needed to conclude that the investments lacked reliability value.[2]

**Q: Is there evidence in Staff testimony that any specific lateral replacement or feeder improvement project failed to provide reliability benefits?**

A: No. Staff did not identify a specific project that failed to provide reliability benefits.

**Q: Has Staff quantified what reliability performance would have been absent the investments at issue?**

A: No. Staff specifically acknowledges that it is difficult to determine what reliability metrics would have been without those investments.[3]

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[2] See M. Bowman Rebuttal at 12-13.

[3] See M. Bowman Rebuttal at 12.

## V. COST-BENEFIT COMPARISONS

**Q: Staff recommends comparing increased vegetation management against additional lateral replacement investment. Are those programs intended to solve identical reliability problems?**

A: No.[4] Vegetation management targets vegetation-related outages, while lateral replacement programs address equipment condition and asset failure risks.

**Q: Would a focus on trimming vegetation cut outages without increasing equipment spending?**

A: No. Vegetation management and equipment replacement address different reliability risks and are complementary, not interchangeable, components of Evergy's reliability strategy. While effective vegetation management can help reduce vegetation-related outages, it cannot address the deterioration of distribution equipment and aging infrastructure. As discussed previously, equipment-related outages are a leading cause of customer interruptions during normal, blue-sky operating conditions. Accordingly, increasing vegetation management activities alone would not eliminate the need for prudent equipment replacement investments. Maintaining and improving reliability requires both effective vegetation management and targeted investments in aging infrastructure to address the distinct causes of customer outages.

**Q: Would it be appropriate to evaluate reliability programs solely on the basis of SAIDI trends?**

[4] See M. Bowman Rebuttal at 14.

A: No. Reliability performance is influenced by numerous variables, including weather, storm events, customer growth, vegetation conditions, and equipment condition. A comprehensive evaluation requires consideration of multiple reliability metrics and system factors.

**Q: Does the absence of significant SAIDI improvement necessarily mean an investment lacked value?**

A: No. Investments may prevent reliability deterioration that otherwise would have occurred. Maintaining reliability levels despite aging infrastructure and increasing system demands can itself represent a significant customer benefit.

## VI. STAFF RECOMMENDATION

**Q: Staff recommends further analysis before additional investment in certain programs. Does Evergy evaluate the performance of its reliability programs?**

A: Yes. Evergy routinely reviews reliability performance, outage causes, asset condition information, and program effectiveness to prioritize investments that provide customer benefits.

**Q: What is your overall response to Staff's recommendation that reliability improvements might be better achieved through vegetation management than through lateral replacement investments?**

A: The evidence supports continuing both approaches. Because vegetation-related outages and equipment-related outages are separate reliability drivers, an effective reliability strategy requires appropriate investment in vegetation management and prudent investment in aging infrastructure.

**Q: Does that conclude your testimony?**

A: Yes, it does.

**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 RYAN P. MULVANY**

**STATE OF MISSOURI )**
**) ss**
**COUNTY OF JACKSON )**

Ryan P. Mulvany, being first duly sworn on his oath, states:

1. My name is Ryan P. Mulvany. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Vice President Distribution – Power Delivery Administration.

2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of Evergy Missouri Metro consisting of ten (10) 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.

Ryan P. Mulvany

Subscribed and sworn before me this 10th 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