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Staff – Exhibit 104
Direct Testimony of Claire M. Eubanks, PE
Case No. ER-2026-0143

Exhibit No.:	
Issue(s):	*Large Load Policy*
Witness:	*Claire M. Eubanks, PE*
Sponsoring Party:	*MoPSC Staff*
Type of Exhibit:	*Direct Testimony*
Case No.:	*ER-2026-0143*
Date Testimony Prepared:	*June 30, 2026*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

DIRECT TESTIMONY
REVENUE REQUIREMENT

OF

CLAIRE M. EUBANKS, PE

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

CASE NO. ER-2026-0143

Jefferson City, Missouri
June 2026

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

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CLAIRE M. EUBANKS, PE

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

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DIRECT TESTIMONY

OF

CLAIRE M. EUBANKS, PE

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

CASE NO. ER-2026-0143

Q. Please state your name and business address.

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

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

A. I am employed by the Missouri Public Service Commission ("Commission") as Division Director of the Industry Analysis Division.

Q. Please describe your educational background and work experience.

A. I received my Bachelor of Science degree in Environmental Engineering from the University of Missouri – Rolla, now referred to as Missouri University of Science and Technology, in May 2006. I am a licensed professional engineer in the states of Missouri and Arkansas. From May 2006 to November 2012, I was employed by Aquaterra Environmental Solutions, Inc., now SCS Aquaterra, an engineering consulting firm. I commenced my employment with the Commission in November 2012.

Q. Have you previously filed testimony before the Commission?

A. Yes, numerous times. Please refer to Schedule CME-d1, attached to this Direct Testimony, for a list of cases in which I have filed testimony or recommendations.

Q. What knowledge, skills, experience, training, and education do you have in the areas of which you are testifying as an expert witness?

A. I have received continuous training at in-house and outside seminars on technical and ratemaking matters since I began my employment at the Commission. I have been employed by this Commission for over 13 years and have submitted testimony numerous times before the Commission. I have also been responsible for the supervision of other Commission employees in rate cases and other regulatory proceedings. In my current position, I direct the work of Staff's four electric departments,[1] and the Water Sewer Gas and Steam, Manufactured Housing, and Safety Engineering departments. Additionally, I currently serve as co-chair to the NARUC Staff Sub-committee on Reliability and Resilience.

EXECUTIVE SUMMARY

Q. What is the purpose of your direct testimony?

A. The purpose of my direct testimony is to present Staff's approach to large load for the purposes of this rate case, present to the Commission apparent inconsistencies between the commission-approved Schedule Large Load Power Service ("LLPS") for Evergy Missouri Metro's ("EMM"), and the Electric Service Agreement ("ESA") *** [redacted] ***, and to recommend balanced reporting requirements necessary for Staff to perform its duties in future rate cases and proceedings.

[1] Tariff and Rate Design, Engineering Analysis, Energy Resources, and Energy Planning

Q. Is Staff seeking to relitigate rate structure issues decided in Evergy's Large Load tariff case (EO-2025-0154)?

A. No. However, there are certain issues that Staff is presenting so that the Commission has information necessary to set just and reasonable rates in this case and future cases.

Q. Who are the other Staff witnesses that present analysis related to large loads in this case?

A. Staff witness Sarah Lange presents the calculation of Staff's true-up plug to reflect net revenues from large customers, annualized for the expected conditions as of June 30, 2026, and explains how current and adjusted revenues from these customers are incorporated into Staff's overall revenue increase recommendation. Staff witness Matt Young identifies the status of infrastructure associated with large customers in Staff's case. Additionally, Ms. Lange sets out amounts necessary for Staff witness Brooke Mastrogiannis to develop the Fuel Adjustment Clause ("FAC") base factor with the true-up estimate. Ms. Lange's calculations are supported by Staff witness J Luebbert who addresses the quantification of Southwest Power Pool ("SPP")-related expenses and allocations. Ms. Lange further offers mitigation options to improve the FAC considering large customer growth. Staff witness Brooke Mastrogiannis provides Staff's estimate of the FAC base factor expected at true-up, explains the expected future FAC impact of large customers, and discusses how to implement the mitigation options to improve the FAC to mitigate harm to non- LLPS customers.

APPROACH TO LLPS CUSTOMER GROWTH

Q. Please explain how Staff's approach to large customers in this case is consistent with its work in all rate cases.

A. In all rate cases, Staff applies traditional ratemaking principles. While large load customer growth in this case *** [redacted] *** and, as Staff witness Sarah Lange will further explain, *** [redacted] ***. Staff relies on the matching principle and proposes isolated adjustments with caution,[2] to ensure that its recommendations to the Commission are balanced and reasonable.

A proper determination of revenue requirement is dependent upon matching the components of rate base, return on investment, revenues and operating costs at a point in time. As Staff witness Keith Majors discusses in more detail in his direct testimony in this case, certain adjustments are used to reflect a utility's current operating level of revenues and expenses. Relevant to Staff's approach to large load customer revenue is annualization adjustments. Annualization adjustments are required when changes have occurred during the test year, update and/or true-up period that have not been fully reflected in the unadjusted test year results.

Q. Please describe the potential LLPS customers and related annualization adjustments.

[2] Isolated adjustments may be warranted when such adjustments are known and measurable and do not disrupt the relationship between revenue, expense, and investment.

A. Customer A, *** [redacted] *** in Staff's test year (updated through December 31, 2025), nor are related expenses captured in Staff's direct accounting schedules. Customer A *** [redacted] ***. Customer B is currently served on the Large Power Service rate schedule, not LLPS. *** [redacted] *** [3] *** [redacted] *** [4]. *** [redacted] ***. As Staff witness Sarah Lange further explains, Staff developed a true-up plug to estimate conditions that will be in place as of the true-up cutoff date.

Q. When a utility requests to continue or modify its fuel adjustment clause in a general rate case, what work does Staff perform?

A. Staff evaluates whether the utility should be authorized to continue its FAC and if any modifications are warranted. Additionally, Staff identifies an estimate of the FAC costs and revenues (i.e. Net Base Energy Cost ("NBEC")) to include in its revenue requirement calculations and proposes a base factor. The base factor is calculated as

[3] *** [redacted] ***
[4] *** [redacted] ***

the NBEC divided by the net system input ("NSI") (i.e. rate case normalized kilowatt-hours ("kWh")). The base factor is important because ratepayers will see bill impact through future Fuel Adjustment Rate ("FAR") filings if actual net energy costs ("ANEC") are substantially different than the NBEC set during a rate case.

Q. Is Staff presenting the information necessary for the Commission to continue EMM's FAC?

A. Yes. Staff witness Stacy Henderson provides an analysis concluding that EMM's FAC should continue. Staff witness Brooke Mastrogiannis provides examples in her direct testimony to illustrate the importance of setting the base factor and calculates the base factor for the 12-months ending December 31, 2025 ("preliminary FAC base factor"). In the preliminary FAC base factor calculation, Customer A's load is not reflected, and Customer B is reflected at *** [redacted] *** Staff witness Brooke Mastrogiannis provides an estimate of the base factor at true-up based on the FAC-includable expense estimated for Staff witness Sarah Lange's true-up plug.

Q. At a high level, why does large customer growth matter to the FAC?

A. The FAC socializes net energy costs across customer classes. EMM sells its produced energy into SPP and buys back what it needs to serve all its customers. During a rate case, the annualized level of these transactions are modeled and reflected in the revenue requirement and are used to set the base factor. However, LLPS customers' rates are designed to cover the cost of serving them, including wholesale energy costs. During a rate case, with proper information, the relationship of the FAC base factor and permanent rates can be aligned. Because of

the size of large customers served under Schedule LLPS and the period of time it takes to ramp their operations, establishing this relationship is more challenging.

Q. What is Staff's approach to large customers and the FAC in this case?

A. Staff presents two alternative recommendations for the Commission's consideration to mitigate the impact of LLPS customer growth on EMM ratepayers through the operation of the FAC.

Q. Please explain the first option.

A. Option 1 continues the FAC and is designed to insulate other rate classes from only the adverse FAC impact of the level of load captured in this rate case. Staff witness Brooke Mastrogiannis calculates Option 1 using Staff's preliminary base factor calculation adjusted to reflect Customer A and Customer B as calculated by Staff witness Sarah Lange. Under this option, LLPS customers would pay an FAC charge.

Q. Is Option 1 the same recommendation Staff presented in Evergy's large load tariff case (EO-2025-0154)?

A. No. Option 1 simply reflects net revenues from large customers for the expected conditions as of June 30, 2026.

Q. Please explain the second option.

A. Option 2 modifies the FAC to exclude major costs and any revenues from optional riders related to LLPS customers, and to exempt LLPS customers from the FAC. A biproduct of Option 2 is that it would reduce the positive regulatory lag Evergy would experience due to LLPS growth between rate cases. Staff witness Sarah Lange elaborates on Staff's FAC mitigation options and calculates the positive regulatory lag EMM will

benefit from with and without modification to the FAC. Staff witness Brooke Mastrogiannis describes how to implement modifications to the FAC contemplated by Option 2.

Q. Is Option 2 the same recommendation Staff presented in Evergy's large load tariff case?

A. No, but Option 2 is similar. In the Evergy large load tariff case, Staff acknowledged that changes to the FAC must occur during a general rate proceeding where all relevant factors could be considered. However, Staff proposed tracking of certain costs and revenues and recommended establishing a pricing node for large load customers. Ultimately, the Commission decided that it "will not change the existing FAC tariff sheet until a rate case is filed"[5] and further decided that "[t]he Commission will not require LLPS customers to have a commercial pricing node nor will they require Evergy to provide data on that node."[6] Staff considered the Commission's order in developing its recommendation in this case and offers Option 2 as an alternative method of separating LLPS costs and revenues from the FAC if the Commission so chooses.

TARIFF APPLICATION

Q. Did Staff review EMM's application of its Schedule LLPS tariff in this case?

A. Yes. During the normal course of its work, Staff reviews a utility's application of its commission-approved tariff provisions to ensure compliance. Staff witness Sarah Lange discusses other Staff concerns with EMM's application of

[5] Page 41
[6] Page 42

its LLPS tariff. I will discuss the Interim Capacity provision and EMM's apparent inconsistency between application of *** [redacted] *** and requirements of Schedule LLPS.

Q. What is the Interim Capacity provision?

A. The Interim Capacity provision[7] of EMM's schedule LLPS includes a provision to address situations where EMM cannot serve an LLPS customer's load by existing system capabilities. If EMM and the customer mutually agree to terms to procure interim capacity, the customer is subject to an additional demand charge.

Q. Can EMM serve the LLPS load by existing system capabilities?

A. Staff specifically requested this information from EMM. ** [redacted] **[8].

In EMM's 2025 IRP it expected to be *** [redacted] *** compared to *** [redacted] *** in its 2026 Annual

[7] "If the Company determines that the Customer's load cannot be served by the Company's existing system capabilities, the Company may enter into specific market contract agreements to provide the necessary capacity requirements of the Customer until sufficient system capacity may be supplied by the Company. The Customer and the Company must mutually agree on the terms for the Interim Capacity procured by the Company pursuant to an Interim Capacity Agreement. The Customer shall be subject to an additional demand charge (the "Interim Capacity Adjustment") calculated according to the terms of an Interim Capacity Agreement, with Customer responsible for the full costs thereof and the terms of the Customer's Interim Capacity Agreement."

[8] Confidential response to DR 322.4.

Update.[9] More specifically, the 2026 Annual IRP update includes *** [redacted] *** [10]. While other *** [redacted] *** as illustrated in the following chart.

***

[redacted]

[9] EMM's 2026 Annual IRP update EO-2026-0188 Confidential workpaper *** [redacted] ***. Staff designated as HC in accordance with the protective order in this case.

[10] EMM's 2026 Annual IRP update EO-2026-0188 Confidential workpaper *** [redacted] ***. Staff designated as HC in accordance with the protective order in this case.

[11] *** [redacted] ***

[redacted]

[redacted]

[redacted]

[redacted]

***

Q. Please explain Staff's concern with EMM's application of the Interim Capacity Provision of Schedule LLPS.

A. ** [redacted]

[redacted]

[redacted]

[

[redacted] **[13] Staff notes that EMM *** [redacted] ***[14]. ** [redacted] **[15]. However, it is unclear whether the *** [redacted] ***. At this time, it is unclear to Staff under what circumstances EMM would ** [redacted] **. Later in my testimony, I outline Staff's recommendation to require EMM to provide ESAs and capacity and demand forecasts with and without LLPS customers; together provision of this information would alleviate Staff's concern with being able to assess the application of the Interim Capacity provision going forward.

Q. Are there elements of the Customer A ESA that are apparently inconsistent with the Commission's order in EO-2025-0154 and the LLPS tariff?

A. Yes. The ESA with Customer A *** [redacted]

[13] Confidential response to DR 322.4.
[14] Confidential response to DR 322.2. Staff elevated to HC designation per the Protective Order issued in this case on April 13, 2026.
[15] Confidential response to DR 322.4.

[redacted] ***. In the large load tariff case, the Commission was aware of the potential for SPP to offer Conditional High Impact Large Load Service ("CHILLS"). However, FERC approval occurred recently with SPP's tariffs to be effective on July 1, 2026.[16] While the Commission was aware of the SPP revision request to implement CHILLS, the Report and Order nor the stipulation addresses how, or if, EMM will charge LLPS customers for *** [redacted] ***.

Q. What authority does EMM provide for *** [redacted] ***?

[16] Order Accepting Tariff Revisions, Subject to Condition. FERC Docket Nos. ER26-1323-000 and ER26-1323-001. Schedule CME-d1.

A. In response to Staff data request 410,[17] EMM suggests in part: *** [redacted] ***.

Q. Does Sheet 78 of Schedule LLPS contemplate *** [redacted] *** ?

A. No. Schedule LLPS, Sheet 78 sets out that the LLPS service agreement will include a Contract Capacity schedule including the peak load requirement during the Load Ramp and addresses reductions to contract capacity.

Q. What does Sheet 82 of Schedule LLPS address?

A. Under the heading "Additional Terms", Sheet 82 requires the LLPS service agreement. *** [redacted] ***.

LLPS REPORTING

Q. Please explain Staff's goal in recommending LLPS reporting.

[17] Included in Schedule SLK-d3 attached to the direct testimony of Staff witness Sarah Lange.

A. Staff seeks to standardize LLPS reporting and ensure necessary information is provided by the relevant electric utilities to perform its duties. Staff's recommendation regarding LLPS reporting is consistent with the Amended Non-Unanimous Global Stipulation and Agreement ("Ameren Stipulation") approved by the Commission in ET-2025-0184. While Staff acknowledges the Commission denied reporting requirements in the Evergy LLPS case (EO-2025-0154), as Staff's justification for certain reporting was not found to be persuasive, the Commission later approved the Ameren Stipulation that included balanced and specific reporting conditions. My testimony will discuss the provisions of the Ameren Stipulation and why the Commission should order EMM to provide similar reporting.

Q. At a high-level, what information on large customers does Staff require?

A. For both rate cases and for evaluating utility load forecasts in Integrated Resource Plans ("IRP"), Staff requires an understanding of large load growth expectations including "whether, when, and how completely large load will materialize and how they use electricity over time."[18] Staff will continue to advocate for such information tailored for the IRP in the working case (EW-2026-0091) and the subsequent rulemaking docket. However, the timeline for provision of such information through the IRP does not align with Staff's rate case work. For that reason, Staff requests the Commission order additional reporting by EMM.

[18] Forecasting For Large Loads: Current Practices and Recommendations, Energy Systems Integration Group's Large Loads Task Force, December 2025.

Q. What categories of information does Staff recommend the Commission order EMM to provide?

A. There are three categories of information Staff recommends the Commission order: (1) Annual reporting to the Commission; (2) Provision of executed agreements and related information; and (3) Improved rate case filing requirements specific to LLPS.

Q. What annual reporting does Staff recommend the Commission receive related to LLPS customers?

A. Consistent with paragraph 37 of the Ameren Stipulation, Staff recommends EMM, OPC, Staff, and other interested parties in this case, meet to determine the contents and confidentiality of an annual compliance report to be provided to the Commission. At a minimum, this report should contain information regarding: (i) the number of new or expanded customers that are taking LLPS and (ii) the total estimated load taking LLPS. Energy usage information will be provided on a confidential and anonymized basis.

Q. What is the intent of annual reporting to the Commission?

A. In both the Ameren and Evergy large load tariff cases, OPC and Staff presented its viewpoints of reporting that the Commission may be interested in receiving for insight into the large load economic pipeline of its regulated electric utilities. From Staff's perspective, this condition would provide the opportunity to work collaboratively with the parties to develop an annual report. Ultimately, this report is intended for the Commission.

Q. What information does Staff recommend the Commission order EMM to provide regarding its agreements with LLPS customers?

A. Staff recommends, consistent with the Ameren Stipulation, paragraph 51, that the Commission order EMM to provide Staff executed agreement(s) with LLPS customers and certain related information. Specifically, Staff recommends the Commission order that:

> Within 30 days after the execution of any agreement relating to LLPS with a LLPS customer, EMM will provide to the Staff the executed agreement(s) and the following information with a level of confidentiality commensurate with the confidentiality provisions in place in this docket:
>
> a) An updated capacity and demand forecast without the new LLPS customer.
>
> b) An updated capacity and demand forecast with the new LLPS customer.
>
> c) The boundary of EMM's facilities serving the LLPS customer in a format supported by the State's geographic information system (GIS) software.
>
> d) Evidence that EMM has completed all internal engineering studies supporting the interconnection, a description of all interconnection upgrades and interconnection facilities needed for the LLPS customer, and a complete copy of the interconnection study. EMM will also provide a copy of the construction agreement documenting all estimated costs related to interconnection of the LLPS customer and provide how those costs will be recorded on EMM's books and records.

e) To the extent known to EMM, the LLPS customer's full corporate name and registration information, and that of any and all parent companies.

Q. How would Staff use the information outlined above?

A. By having access to the ESAs, Staff will be able to evaluate whether EMM is complying with its tariffs. Access to the ESAs and provision of capacity and demand forecasts will provide Staff with an understanding of the impact large load customer demand will have on EMM with respect to capacity needs. Provision of shape files noting the location of EMM facilities serving LLPS customers will provide Staff a general understanding of the location of utilities' facilities which will aide Staff in its work supporting the State Emergency Management Agency during emergency activations and responding to customer quality of service inquiries. Provision of engineering studies, construction cost estimates, and how such facilities will be recorded will allow Staff to have timely access to information for rate case audits.

Q. What improved rate case filing information does Staff recommend the Commission order EMM to provide?

A. Consistent with paragraph 52 of the Ameren Stipulation, Staff recommends the Commission order the following:

In each rate case after a LLPS customer begins taking permanent service (which will occur when the ramp period begins), the EMM will provide as part of its direct case workpapers actual customer load, by hour, starting with the later of the month following the month the customer began taking permanent service or the end of the test year of a previous rate case in which the customer's load

was reported through the test year used in the rate case. EMM will provide updated information through a date mutually agreed upon between EMM and the Staff (and if agreement is not reached, as ordered by the Commission) through which Staff intends to calculate billing units for its initial filing in response to the EMM's rate case filing, and will in any event provide updated information through the true-up cutoff date as part of its provision of true-up data in the case. EMM will provide such load data hourly and at 15-minute demand intervals upon request. Such information will be provided with a level of confidentiality commensurate with the confidentiality provisions in place in this docket.

Q. Why is the improved rate case filing information important to Staff's work?

A. This case is an example of why actual customer load, by hour, with 15-minute demand intervals[19] being available, is important to Staff's rate case work. Despite its discovery efforts on this topic, which began on March 6, 2026, EMM has not provided Staff hourly customer load for Customer A, either estimated or actual. Because *** [redacted] ***. In similar instances, for large power customers, Staff performs single customer annualizations which require granular data. For Staff to annualize class loads, do production cost modeling, or to calculate jurisdictional allocation factors this information is essential. Staff witness Sarah Lange further

[19] Monthly Maximum Demand is defined in Schedule LLPS "as the highest demand in any 15-minute interval during the month on all meters."

describes this issue in her direct testimony under “Limatiations on Incorporation of the True-up Plug.”

Q. Does this conclude your direct 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 CLAIRE M. EUBANKS, PE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW CLAIRE M. EUBANKS, PE and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Direct Testimony-Revenue Requirement*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Claire M Eubanks

CLAIRE M. EUBANKS, PE

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 26th day of June 2026.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2029
Commission Number: 12412070

D Suzie Mankin

Notary Public

CLAIRE M. EUBANKS, PE

PRESENT POSITION:

I am the Division Director of the Industry Analysis Division of the Missouri Public Service Commission. As Division Director, I oversee all aspects of the Industry Analysis Staff. Industry Analysis consists of seven departments: Tariff and Rate Design, Engineering Analysis, Energy Resources, Energy Planning, Water Sewer Gas and Steam, Manufactured Housing, and Safety Engineering.

EDUCATIONAL BACKGROUND AND WORK EXPERIENCE:

I received my Bachelor of Science degree in Environmental Engineering from the University of Missouri – Rolla, now Missouri University of Science and Technology, in May 2006. I am a licensed professional engineer in the states of Missouri and Arkansas. Immediately after graduating from UMR, I began my career with Aquaterra Environmental Solutions, Inc., now SCS Aquaterra, an engineering consulting firm based in Overland Park, Kansas. During my time with Aquaterra, I worked on various engineering projects related to the design, construction oversight, and environmental compliance of solid waste landfills. I began my employment with the Commission in November 2012. I managed the Engineering Analysis department beginning in April 2020 and was promoted to my current position in December 2025.

Currently, I am the co-chair of the NARUC Staff subcommittee on Electric Reliability & Resilience.

CASE HISTORY:

Case Number	Utility	Type	Issue
EA-2012-0281	Ameren	Rebuttal	Certificate of Convenience and Necessity
EC-2013-0379 EC-2013-0380	KCP&L KCP&L GMO	Rebuttal	RES Compliance
EO-2013-0458	Empire	Memorandum	RES Compliance Plan & Report
EO-2013-0462	Ameren	Memorandum	RES Compliance Report
EO-2013-0503	Ameren	Memorandum	RES Compliance Plan
EO-2013-0504	KCPL	Memorandum	RES Compliance Plan & Report
EO-2013-0505	GMO	Memorandum	RES Compliance Plan & Report
ET-2014-0059	KCP&L GMO	Rebuttal	RES Retail Rate Impact
ET-2014-0071	KCP&L	Rebuttal	RES Retail Rate Impact
ET-2014-0085	Ameren	Rebuttal	RES Retail Rate Impact
ER-2014-0258	Ameren	Cost of Service Report, Surrebuttal	RES, In-Service

Case Number	Utility	Type	Issue
EO-2014-0151	KCP&L GMO	Memorandum	RESRAM
EO-2014-0357	Electric	Memorandum	Solar Rebates Payments
EO-2014-0287	KCPL	Memorandum	RES Compliance Plan
EO-2014-0288	GMO	Memorandum	RES Compliance Plan
EO-2014-0289	KCPL	Memorandum	RES Compliance Report
EO-2014-0290	GMO	Memorandum	RES Compliance Plan
ER-2014-0370	KCP&L	Cost of Service Report	RES
EX-2014-0352	N/A	Live Comments	RES rulemaking
EC-2015-0155	GMO	Memorandum	Solar Rebate Complaint
EO-2015-0260	Empire	Memorandum	RES Compliance Plan & Report
EO-2015-0263	KCPL	Memorandum	RES Compliance Report
EO-2015-0264	GMO	Memorandum	RES Compliance Report
EO-2015-0265	KCPL	Memorandum	RES Compliance Plan
EO-2015-0266	GMO	Memorandum	RES Compliance Plan
EO-2015-0267	Ameren	Memorandum	RES Compliance Plan & Report
EO-2015-0252	GMO	Staff Report	Integrated Resource Plan – Renewable Energy Standard
EO-2015-0254	KCPL	Staff Report	Integrated Resource Plan – Renewable Energy Standard
EA-2015-0256	KCP&L GMO	Live Testimony	Greenwood Solar CCN
EO-2015-0279	Empire	Memorandum	RES Compliance Plan & Report
ET-2016-0185	KCP&L	Memorandum	Solar Rebate Tariff Suspension
EO-2016-0280	KCPL	Memorandum	RES Compliance Report
EO-2016-0281	GMO	Memorandum	RES Compliance Report
EO-2016-0282	KCPL	Memorandum	RES Compliance Plan
EO-2016-0283	GMO	Memorandum	RES Compliance Plan
EO-2016-0284	Ameren	Memorandum	RES Compliance Plan & Report
ER-2016-0023	Empire	Report	RES
ER-2016-0156	KCP&L GMO	Rebuttal	RESRAM Prudence Review
EA-2016-0208	Ameren	Rebuttal	Certificate of Convenience and Necessity

Case Number	Utility	Type	Issue
ER-2016-0285	KCPL	Cost of Service Report	In-Service, Greenwood Solar
ER-2016-0179	Ameren	Rebuttal	In-Service, Labadie Landfill
EW-2017-0245	Electric	Report	Working Case on Emerging Issues in Utility Regulation
EO-2017-0268	Ameren	Memorandum	RES Compliance Plan & Report
EO-2017-0269	KCPL	Memorandum	RES Compliance Report
EO-2017-0271	KCPL	Memorandum	RES Compliance Plan
GR-2017-0215 & GR-2017-0216	Spire	Rebuttal & Surrebuttal	CHP for Critical Infrastructure
GR-2018-0013	Liberty Utilities (Midstates Natural Gas)	Rebuttal	CHP Outreach Initiative for Critical Infrastructure Resiliency
EO-2018-0287	Ameren	Memorandum	RES Compliance Plan & Report
EO-2018-0288	KCPL	Memorandum	RES Compliance Report
EO-2018-0290	KCPL	Memorandum	RES Compliance Plan
EA-2016-0207	Ameren	Memorandum	Certificate of Convenience and Necessity
ER-2018-0146	GMO	Cost of Service Report	RESRAM Prudence Review
ER-2018-0145 ER-2018-0146	KCPL GMO	Class Cost of Service Report, Rebuttal	Solar Subscription Pilot Rider, Standby Service Rider
EA-2018-0202	Ameren	Staff Report	Certificate of Convenience and Necessity
EE-2019-0076	Ameren	Memorandum	Variance Request – Reliability Reporting
EA-2019-0021	Ameren	Staff Report	Certificate of Convenience and Necessity
EA-2019-0010	Empire	Staff Report	Certificate of Convenience and Necessity
EX-2019-0050	N/A	Live Comments	Renewable Energy Standard
EO-2019-0315	KCPL	Memorandum in Response to Commission Questions	Renewable Energy Standard
EO-2019-0316	GMO	Memorandum	Renewable Energy Standard

Case Number	Utility	Type	Issue
EO-2019-0317	KCPL	Memorandum in Response to Commission Questions	Renewable Energy Standard
EO-2019-0318	GMO	Memorandum	Renewable Energy Standard
ER-2019-0335	Ameren	Cost of Service Report	Renewable Energy Standard, In-Service Criteria
EA-2019-0371	Ameren	Staff Report	Certificate of Convenience and Necessity
EO-2020-0329	Evergy Missouri Metro	Memorandum	Renewable Energy Standard
EO-2020-0330	Evergy Missouri West	Memorandum	Renewable Energy Standard
EE-2021-0237	Evergy Missouri Metro	Memorandum	Cogeneration Tariff
EE-2021-0238	Evergy Missouri West	Memorandum	Cogeneration Tariff
EE-2021-0180	Ameren Missouri	Memorandum	Electric Meter Variance
ET-2021-0151 and 0269	Evergy	Memorandum, Rebuttal Report	Transportation Electrification
AO-2021-0264	Various	Staff Report	February 2021 Cold Weather Event
EW-2021-0104	n/a	Staff Report	RTO Membership
EW-2021-0077	n/a	Staff Report	FERC Order 2222
EO-2021-0339	Evergy Missouri West	Memorandum	Territorial Agreement
GR-2021-0108	Spire	Rebuttal	Automated Meter Reading Opt-out Tariff
EA-2021-0087	ATXI	Rebuttal Report	Certificate of Convenience and Necessity
ER-2021-0240	Ameren Missouri	Cost of Service Report Rebuttal	In-Service Bat Mitigation
ER-2021-0312	Empire	Cost of Service Report	Construction Audit – Engineering Review, In-service
EO-2022-0061	Evergy Missouri West	Surrebuttal	Special Rate/ Renewable Energy Standard

Case Number	Utility	Type	Issue
EA-2022-0099	ATXI	Rebuttal	Certificate of Convenience and Necessity
EA-2022-0234	NextEra Energy Transmission	Rebuttal	Certificate of Convenience and Necessity
ER-2022-0129	Evergy Missouri West	Direct Rebuttal	Advanced Metering Infrastructure, Reliability, Transmission & Distribution Investment, PISA reporting, Misc. Tariff issues
ER-2022-0130	Evergy Missouri Metro	Direct Rebuttal Surrebuttal/True-Up	Advanced Metering Infrastructure, Reliability, Transmission & Distribution Investment, PISA reporting, Misc. Tariff issues
EE-2022-0329	Ameren Missouri	Memorandum	Variance Request
GR-2022-0179	Spire Missouri	Direct Rebuttal	Metering Infrastructure
ER-2022-0337	Ameren Missouri	Direct Rebuttal Surrebuttal/True-Up	Rush Island, Smart Energy Plan, High Prairie
EA-2023-0017	Grain Belt	Rebuttal	Certificate of Convenience and Necessity
ET-2023-0250	Empire	Memorandum	Cogeneration/ Net Metering Tariff
GE-2023-0196	Empire District Gas Company	Memorandum	Variance Request
EO-2023-0423 EO-2023-0424	Evergy	Memorandum	Solar Subscription Program
EC-2024-0108	Ameren Missouri	Staff Report	Complaint
EA-2024-0147	ATXI	Memorandum	Certificate of Convenience and Necessity
EO-2024-0231	Ameren Missouri	Memorandum	Renewable Energy Standard
EE-2024-0335	Evergy Missouri Metro	Memorandum	Electric Meter Variance
EF-2024-0021	Ameren Missouri	Rebuttal Surrebuttal	Securitization
ER-2024-0189	Evergy Missouri West	Direct Rebuttal Surrebuttal	In-service, Distribution Reliability, Net Metering

Case Number	Utility	Type	Issue
GR-2024-0106	Liberty Midstates	Direct Surrebuttal	Mains, Meters, and Service Lines
ER-2024-0319	Ameren Missouri	Direct, Rebuttal, Surrebuttal / True-Up Direct	High Prairie, Rush Island, Energy Delivery Projects
EE-2025-0158	Evergy Missouri Metro	Memorandum	Electric Meter Variance
GR-2025-0107	Spire Missouri	Direct, Rebuttal	CPR Audit, Stranded Meters
ET-2025-0286	Evergy Missouri Metro	Memorandum	TOU Net Metering
EA-2025-0087	ATXI	Staff Recommendation	Certificate of Convenience and Necessity
EE-2025-0322	Ameren Missouri	Memorandum	Reporting Variance
ER-2024-0261	Empire District Electric	Direct, Rebuttal, Surrebuttal/True-Up Direct	Transmission & Distribution Projects, Reliability
EA-2025-0344	Ameren Missouri	Staff Recommendation	Certificate of Convenience and Necessity
EO-2025-0154	Evergy	Staff Recommendation	Large Load Tariff
EA-2024-0302	ATXI	Surrebuttal	Certificate of Convenience and Necessity
ET-2025-0184	Ameren Missouri	Staff Recommendation, Surrebuttal	Large Load Tariff
OO-2025-0233	Liberty Utilities	Staff Investigation Report	Net-metering