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Direct Testimony of Randall T. Jennings
Case No. ER-2026-0143

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MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

DIRECT TESTIMONY
REVENUE REQUIREMENT

OF

RANDALL T. JENNINGS

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

CASE NO. ER-2026-0143

Jefferson City, Missouri
June 2026

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DIRECT TESTIMONY OF

RANDALL T. JENNINGS

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

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DIRECT TESTIMONY

OF

RANDALL T. JENNINGS

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 Randall T. Jennings, 200 Madison Street, Jefferson City, Missouri 65101.

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

A. I am employed by the Missouri Public Service Commission ("Commission") as a Senior Research and Data Analyst for the Tariff/Rate Design Department, in the Industry Analysis Division.

Q. Please describe your educational and work background.

A. I have a Bachelor of Science degree in Business Administration awarded from Drury University. I have more than 15 years of experience in regulatory programs. My previous professional experience includes working as an Investigator for the Missouri Attorney General's Office and Regulatory Auditor and Regulatory Auditor Supervisor for the Missouri Division of Professional Registration. I started my career with the Commission as a Utility Regulatory Auditor in November 2021.

Q. Have you previously testified in proceedings before the Missouri Public Service Commission?

A. Yes. I have provided testimonies in multiple cases before the Missouri Public Service Commission. Please see Schedule RTJ-d1.

EXECUTIVE SUMMARY

Q. What is the purpose of your direct testimony?

A. The purpose of my direct testimony is divided into two topics. First, I provide Staff's annualized revenues and billing determinants for the Lighting rate class schedule. Second, I address Evergy Missouri Metro's ("EMM") practice of estimated billing and missing-interval data estimation, the relationship between EMM's current practice and EMM's Commission-approved tariff, the effect estimated billing may have on billing determinants and rate design, and Staff's recommendations for Commission direction on that issue.

Q. Do you provide any recommendations that should be specifically reflected in the Commission's Report and Order in this case?

A. Yes, Staff recommends that the Commission's Report and Order in this case address the following:

(1) Adopt Staff's adjusted Lighting class revenues and billing determinants, update-period data and annualization adjustments; and

(2) Direct EMM to use the estimated usage methodology stated in its current Commission-approved tariff; or

(3) Require EMM to file revised tariff language accurately describing the estimation methodology it actually uses and to show that the methodology is reasonable for ratepayers, and;

(4) Require EMM to continue attempting to obtain missing interval data and to adjust customer bills when actual data becomes available;

(5) Require EMM to maintain records of missing intervals, inserted estimated usage, the data supporting each estimate, and the circumstances requiring estimation; and;

(6) Require EMM to identify bills containing estimated usage and report to the Commission and Staff the level of revenue being estimated.

LIGHTING RATE REVENUES AND BILLING DETERMINANTS

Q. What are rate revenues and billing determinants?

A. In her direct testimony, Staff witness Kim Cox explains rate revenues, billing determinants and how they are used to calculate monthly revenues.

Q. What billing determinants are used to set rates for the Lighting class?

A. Specifically for the Lighting class, EMM uses non-metered charges for all but one rate code. As a result, for non-metered charges, EMM has established an amount of energy each unit type will use in any given month and simply charges a set rate per unit regardless of the season (Winter vs. Summer). A light type (or unit type) is listed by EMM using the description of the bulb type, lumen output, pole, cable, and/or other hardware facilitating the light's operation.

Q. How did Staff determine the usage and demand amounts and the rate revenue for the Lighting class for the test year?

A. For the non-metered charges, Staff began by calculating the test year[1] revenue based on the number of units by type provided by EMM.[2] Staff requested the data and billing determinants by class, rate code, and then by light type, which identifies each unit's charge and energy usage within the Lighting class. Test year revenues were then calculated by multiplying the number of units provided for each rate code's light type by the verified tariff rate to come up with a monthly revenue for each rate code and light type. The sum of the monthly revenues provides the test year's total annual revenue for each Lighting rate code. For metered charges, Staff simply multiplied the amount of energy usage by the tariff approved rate.

Q. How did Staff determine the demand amounts and rate revenues for the Lighting class for the update period?[3]

A. Staff applied the same procedure, previously described and used for calculating EMM's demand amounts and rate revenues for the test year, to the update period using data provided by EMM.[4]

Q. Once the usage and associated revenue for the test year and update period were calculated, was Staff able to determine amounts to use as update period adjustments?

[1] Twelve months ending June 30, 2025.
[2] Company response to Staff Data Requests 0102.1, 0174.1 and Company Direct Testimony workpapers.
[3] Twelve months ending December 31, 2025.
[4] Company response to Staff Data Request 0102.1A.

A. Yes. The update period adjustments are calculated by subtracting the test year amounts from the update period amounts. The results of these calculations were downward adjustments in sales and revenue of 964,721.59 kWh and $40,009.08 respectively.

Q. Were there fluctuations in the total energy (kWh) usage in the Lighting class?

A. Yes. Despite sizeable fluctuations between some months within the same year, EMM has claimed that the monthly usage and demand was correctly billed. EMM stated that the fluctuations observed by Staff are driven by a manually billed customer with a non-standard billing cycle based on the customer's request to align with its fiscal year-end.[5] Because of these non-standard billing cycles, one month is extended followed by a shortened billing period for the following month.[6]

Q. Did you adjust the Lighting usage for weather-sensitivity?

A. No. The Lighting class is not considered to be weather sensitive. The determinants for the non-metered Lighting classes remain relatively unaffected by weather because the Lighting classes are subject to regular schedules to serve public places in all incorporated municipalities and other governmental agencies through long term contracts.

Q. Is the currently effective EMM tariff limited to only non-metered fixturese in the Lighting class?

[5] Company response to Staff Data Request 0375.
[6] Company response to Staff Data Request 0375.

A. No, the Lighting class has one rate code, 1OLSL, whose charges are based upon the usage reported by EMM and rates listed in EMM's current tariff. The remaining rate codes are made up of only non-metered units.[7]

Q. Were there anomalies in the total energy usage reported in the rate code 1OLSL?

A. Yes. When Staff combined the energy usage for each light type within rate code 1OLSL, the Staff calculated that total energy usage was different from the total billed by EMM. For the test year, EMM's total billed was approximately 1.5 million kWh greater than Staff's calculated total. For the update period, EMM's total billed was also approximately 1.5 million kWh higher than Staff's calculated total.

Q. Did EMM provide an explanation why the total billed differed from Staff's sum of the light types?

A. EMM stated "[t]here was an issue with two light types (243 Watt LED & 121 Watt LED) that were not fully configured in our MDM [Meter Data Management] system, impacting 1 customer."[8] EMM indicated it is in the process of correcting the issue going forward.

Q. Will the customer's bill be adjusted once a correct amount is determined?

[7] To determine the energy usage (kWh) for Non-Metered units, the monthly usage factor listed in the Tariff Schedule (monthly amount of kWh from the tariff) is multiplied by the unit count provided by EMM.
[8] Company response to Staff Data Request 0174.2.

A. The error has been submitted to EMM's billing department for processing. EMM stated that their rules allow for rebilling of a non-residential undercharge for up to 60 months.[9]

Q. Does the currently effective EMM tariff include all of the rates that are charged to the Lighting class?

A. Yes.

Q. What is annualization?

A. Annualization adjusts a utility's billing to account for known conditions at the end of the update period as if these conditions were carried out through the entire 12-month period. Adjustments for customers that begin Lighting contracts or have additional lighting units installed after the first date of the examination period is an example of an annualization adjustment.

Q. What is growth and was it considered as an adjustment?

A. Growth is an example of annualization and refers to the actual increase or decrease in a determinant over a period of time. For each light type, Staff looked at the monthly average, the trend of the number of each unit type during the test year and update period, and the number of units used for the December 2025 billing determinants. Staff then established a monthly number of units for each light type and calculated the demand and revenue for a full year.

[9] Company email dated June 12, 2026.

Q. Did Staff observe trends of decreasing or increasing numbers of light types in any of the Lighting class rate codes, and if so, what was the determined cause?

A. Staff observed a downward trend in the number of units of select lighting types within the 1ALDA & 1ALDE rate codes and upward trends in the number of units of select lighting types within the 1ALLA & 1ALLE rate codes. EMM stated that rate codes "1ALDA & 1ALDE are on a frozen rate schedule containing only high-pressure sodium and mercury vapor fixtures,"[10] and are "not available for new customers, and existing customers will transition to an LED when old lights need to be replaced, resulting in a decrease in 1ALDA/1ALDE and an increase in 1ALLA/1ALLE."[11]

Q. Once Staff calculated unit numbers, demand and revenue for a year, was Staff able to determine amounts to use as update period adjustments?

A. Yes. Once these amounts were considered and calculated, the results were increases in sales and revenue of 1,493,332.63 kWh and $61,615.28 respectively. When combined with the previous downward adjustments for the update period described earlier, there are net increases in sales and revenue of 528,611.04 kWh and $21,606.21 respectively.

Q. What is your recommendation concerning Lighting revenues and billing determinants?

[10] Company response to Staff Data Request 0375.
[11] Ibid.

A. I recommend the Commission rely upon the level of Lighting class revenues and determinants Staff provided for incorporation into Staff's revenue requirement and rate design.

ESTIMATED BILLING

Q. What is the purpose of your direct testimony regarding estimated billing?

A. My testimony will address issues with EMM's billing system as it relates to using estimates to replace missing data or meter readings.

Q. Is Staff confident with the level of accuracy associated with the billing determinants that have been provided by EMM throughout this case?

A. No. Staff is forced to rely upon information provided by EMM because Staff does not have access to EMM systems. Given EMM's use of estimated billing, Staff cannot say at this time what degree of confidence or doubt it has with EMM's billing determinants. Staff will discuss the extent of estimated billing identified by EMM.

Q. According to EMM, what can cause an estimated bill?

A. There are a few situations that can cause the meter reads and/or interval reads to be estimated and lead to an estimated bill:[12]

1. Communication issues from meter or network;
2. Meter issues including malfunctioning meter; and/or
3. No access to non-AMI meters to retrieve read.

[12] Company response to Staff Data Request 0219.

Q. Does EMM have a policy in place that has been approved by the Commission if meter information is not available?

A. Yes. EMM has rules and regulations applying to electric service for "Estimated Billing Due to Unread Meters" in its current tariff sheets which states in part:

> ...In any event, if no meter reading is obtained in time for billing as scheduled, then subject to 4 C.S.R. 240-13.020, the Company shall render an "estimated bill" based on usage as estimated by the Company. Estimated bills shall be adjusted in the next subsequent billing based upon a reading of the meter by the Company.[13]

Q. What is AMI interval data?

A. AMI interval data includes, among other information, usage data that is read by a given meter sub-hourly. This information provides a much more detailed view of customer usage during discrete time periods when compared to older meter technology that provided meter reads over much longer time periods.

Q. Why is AMI interval data important in this case as it relates to EMM's billing system?

A. AMI interval data is collected by EMM's meter data management ("MDM") system to provide billing determinants that are ultimately used by EMM to bill its ratepayers. Most of EMM's Residential ratepayers are on a peak adjustment billing plan[14] that includes different peak adjustment charges for on-peak and super off-peak periods of time.[15] Since most of EMM's Residential customers are on a time-based rate,

[13] EMM Tariff Sheet 1.23.
[14] Jennings Estimated Interval Impact worksheet.
[15] The Residential Peak Adjustment Service (Schedule RPKA) has different on-peak (4pm – 8pm) and super off-peak (12am – 6am) adjustments during the summer ($0.01152/$(0.01152) and winter ($0.00288/$(0.01152) seasons.

accurate time-based readings are necessary for accurate customer bills, and ultimately accurate billing determinants. Approximately 99.99% of residential customers are currently served on rate options with rate differentials between time periods. It is possible that at times, an indeterminate number of interval readings are being estimated. EMM does not identify a bill as "estimated" until 33% or more of the intervals within the billing period are estimated.[16] Furthermore, the timing of customer usage could also have a direct impact on the billing determinants that EMM utilizes to justify its rate increase request and those determinants that it provides other parties of this case.

Q. Has EMM identified any billing determinants provided to Staff in this case that are based upon estimated interval data and if so, what interval is used?

A. The billing determinants provided by EMM do contain bills that have been identified as "estimated" and are based upon 15-minute usage.[17] During the test year and update period, 48,591 bills were sent to customers and identified by EMM as "estimated."

Q. Does EMM have a procedure in place for estimating usage that has been approved by the Commission if actual usage data is not available?

A. Yes. In its current tariff sheets, EMM has an "Estimated Bill Procedure" to calculate the data in question.[18]

Q. Is the approved process for estimating usage in EMM's tariff sheets the same process currently being used by EMM?

[16] Company response to Staff Data Request 0219.
[17] Company response to Staff Data Request 0220.
[18] EMM Tariff Sheet, P.S.C. MO. No. 2, Nineth Revised Sheet No. 1.23.

A. No, it is not.

Q. When missing interval usage data is estimated for a given customer, how is that data currently calculated for the missing interval?

A. The MDM system leaves any missing intervals blank for up to 48 hours to allow time for a corrected file to arrive.[19] After 48 hours, if the data is still missing, the MDM system estimates any missing interval data and updates those intervals accordingly. The Customer Care and Billing ("CCB"), EMM's billing system, uses the total usage for each billing period, including both actual and estimated intervals, to generate the customer's bill.[20]

Q. Does EMM's current process of estimating billing information differ from the process laid out in EMM's current tariff?

A. Yes. EMM was asked why but replied that its process exists within the provisions of paragraph 6.06[21] titled "Estimated Billing Due To Unread Meters."[22] EMM did not specify different processes for estimating usage involving AMI meters versus non-AMI meters and the current tariff does not contemplate interval data estimation; only usage on a daily basis.

Q. Can you provide a hypothetical example of how missing interval data would be calculated using the processes offered in response to Staff Data Request 0220 compared to the process listed in EMM's current tariff language?

[19] Company response to Staff Data Request 0220.
[20] Ibid.
[21] EMM Tariff Sheet, P.S.C. MO. No. 2, Nineth Revised Sheet No. 1.23.
[22] Company response to Staff Data Request 0220.1.

A. Using EMM's current process, if a customer has a missing interval of time on Tuesday, June 9, 2026, from 2:00 PM to 6:00 PM, EMM's current process of calculating the "estimated" usage is:

1. "If a meter read file is missing usage data for an interval, the MDM leaves those intervals blank for up to 48 hours to allow time for a corrected file to arrive. After 48 hours, if the intervals are still missing, the system estimates them using the following hierarchy:"[23]

2. "Same day/time one week prior – The system first checks the exact interval from the previous week."[24] This would result in copying actual usage data from Tuesday, June 2, 2026 from 2:00 PM to 6:00 PM.

3. "If last week's data isn't available, it looks two weeks back."[25] This would result in copying actual usage data from Tuesday, May 26, 2026 from 2:00 PM to 6:00 PM.

4. "If neither week has data, the system uses similar day types and times."[26] This would result in the MDM searching for an indeterminate Tuesday and copying its actual usage from 2:00 PM to 6:00 PM.

EMM's current tariff[27] (paragraph 6.06) describes the process of calculating "estimated" usage for AMI meters and non-AMI meters but the tariff but does not address estimating usage at a granular level or by increments less than a 24-hour period. When estimating usage involving AMI meters:

1. "....the Meter Data Management (MDM) system will average consumption from the last read plus the three-prior days to estimate the daily meter read."[28] Using the same hypothetical, this would result in replacing all known usage for June 9, 2026 by adding the total usage of June 6, 2026 through June 8, 2026 and dividing it by three.

[23] Company response to Staff Data Request 0219.
[24] Ibid.
[25] Ibid.
[26] Ibid.
[27] EMM Tariff Sheet, P.S.C. MO. No. 2, Nineth Revised Sheet No. 1.23.
[28] Ibid.

2. "If the daily meter reads from the three prior days are not available, a second estimation attempt will be made. In the second attempt the MDM system will average the usage from five historical reads from the previous year. It will average the usage from the read in the prior year from a comparable date as being estimated along with the three days prior and one day after."[29] This would result in the average usage of June 6, 2025 through June 10, 2025.

3. "If the second estimation attempt is not successful, then the process to estimate the daily meter read will be a manual process. In the manual process, the Company will estimate the daily meter read based on historical usage information from the same premise and if not available, the usage of customers with like premises."[30] This would result in EMM staff searching for an indeterminate date either by the same customer or a similar customer in the same rate class.

When estimating usage involving non-AMI meters:

1. "The MDM system will average the usage from the prior year in the same billing month, the usage 35 days before and the usage 35 days after that month."[31] This would result in finding the average daily usage from May through July of 2025.

2. "If that information is not available, a second read estimation attempt will be made by averaging the usage from the prior two readings."[32] This would result in finding the average usage from April to May of 2026.

3. "If the second estimation attempt is not successful, then the estimation is a manual process. The Company will estimate usage based on historical usage information from the same premise and if not available, the usage of Customers with like premises." This would result in EMM staff searching for an indeterminate date either by the same customer or a similar customer in the same rate class.

Staff's hypothetical example is not offered to prove or disprove EMM's current estimation method or assess its accuracy, but rather that it tests and confirms that EMM's current estimation method does not follow the process listed in the current Commission

[29] Ibid.
[30] Ibid.
[31] Ibid.
[32] Ibid.

approved tariff and ultimately produces very different results which could have varying degrees of impact on customer billing.

Q. Do either of the current tariff processes account for estimated usage data differences across time intervals when different rates could be a factor?

A. No.

Q. Does Staff disagree with or believe the interval estimation process currently in use by EMM is inappropriate?

A. At this time, Staff neither supports nor objects to the methodology of EMM's current estimation process. However, it is Staff's position that EMM should follow the usage data estimation process detailed in its Commission approved tariff. Alternatively, EMM should request approval for new tariff language that reflects its current data estimation methodology for Commission approval and provide information how the proposed methodology is the most reasonable method for ratepayers.

Q. How many intervals in a billing period are estimated before EMM considers the customer's bill "estimated"?

A. At the time of billing, the MDM system will evaluate the number of estimated intervals in a billing period. If 33% or more of the intervals within the billing period are estimated, the bill is flagged as "estimated."[33]

Q. How did EMM determine a threshold of 33% of intervals being estimated before a bill is identified as "estimated" is reasonable?

[33] Company response to Staff Data Request 0219.

A. The 33% threshold was selected during the configuration of its billing and MDM systems. The threshold was not determined empirically but was deemed by EMM to be a reasonable level to ensure proper billing by EMM personnel responsible for customer billing.[34]

Q. Which customer type or rate class had the most estimated data intervals?

A. This is unknown. When asked for a full listing of all instances of estimation during the test year through the update period, EMM stated it does not have that data.[35] EMM has provided the number of bills identified as "estimated," but cannot provide the data that was estimated, how those estimations were calculated, which rate class each estimated bill is in, or the total amount billed.[36]

Q. Is the lack of information regarding estimated interval data concerning for Staff?

A. Yes, Staff and all other parties to this case rely upon EMM's billing determinant information. The lack of detailed information on the estimated interval data calls into question the accuracy of the information provided.

Q. How many "estimated" bills did EMM send customers during the test year and update period?

A. EMM sent 6,351,230 bills during the period from June 1, 2024, through December 31, 2025, of which 48,591 (0.7%) were identified as "estimated." Of the bills with estimated determinant data, 48,439 (or 99.7%) involved AMI meters.

[34] Company response to Staff Data Request 0219.1.
[35] Company response to Staff Data Request 0219.2.
[36] Ibid.

The remaining 152 bills were non-AMI meters.[37] However, these "estimated" bills do not include customer bills that are BET and could include estimated data making up to 33% of the billing period's intervals.

Q. Is EMM required to notify customers its bill is being calculated using estimated data?

A. Utilities are required to "clearly and conspicuously note on the bill that it is based on estimated usage."[38]

Q. Are EMM customers notified when a bill is calculated using estimated data and if so, how?

A. EMM provided examples of customer bills and said when a bill is created using "estimated reads" the following text is noted on the bill: "Note: This is an estimated read."[39] No additional detail other than this sentence is provided.[40] If 33% or more of the intervals contained in the billing period are missing and estimated data is inserted, the bill will be flagged as estimated.[41]

Q. How could discrepancies in billing determinant data impact the result of this general rate case?

A. Discrepancies in billing determinant data can impact the result of this case in at least the following ways:

[37] Company response to Staff Data Request 0219.
[38] See 4 CSR 240-13.020.
[39] Company response to Staff Data Request 0427.
[40] Ibid.
[41] Company response to Staff Data Request 0219.

1. Inaccurate billing determinants create unnecessary errors when determining rates as a result of the Commission ordered revenue requirement which could result in rates being set inappropriately high or low;
2. Possible billing errors highlight the importance of Commission attention to the overall revenue requirement as opposed to focusing on the "revenue requirement increase" due to possible inaccuracies of calculated rate revenues;
3. Inaccuracy in billing determinants may cause unreasonable revenue allocation shifts if not considered carefully; and
4. EMM may have inaccurately reported the revenue that it should have received based upon possible billing issues, indicating that an artificially larger revenue requirement increase is necessary, all else being equal. EMM currently offers several residential rate options with high-differential time-of-use periods, notably the RTOU3, which includes a differential between the high and low rate differential of approximately 12:1 in a given day.[42]

Q. Did other Staff witnesses address billing determinants in this case?

A. Yes. Other Staff members addressed billing determinants through testimony in this case including Kim Cox and Amanda Rucker. Several other Staff

[42] The Residential High Differential Time of Use (Schedule RTOU-3) has different Peak and Super Off-Peak adjustments per kWh during the Summer ($0.41341/$0.03445) and Winter ($0.31462/$(0.02621) seasons.

members testified to adjustments to the starting billing determinants that were included in Staff's final billing determinants as well, including Hari Poudel and Michael Stahlman. Each witness bases their testimony and all calculated revenue on information provided by EMM, which includes estimated interval data.

Q. Does Staff address any specific inaccuracies in billing determinants identified by EMM as "estimated"?

A. No. While those estimated bills could ultimately impact the accuracy of billing determinants and calculated rate revenue, Staff cannot address any impact of those estimations due to the lack of additional data.

Q. Does Staff object to EMM using estimated usage data in its billing?

A. Without justification for the use of estimated usage data , Staff can neither support nor object to EMM's procedures. To the extent that EMM is providing bills based upon estimated usage, EMM should at a minimum be complying with, and using, the methodology approved by the Commission and detailed in its current tariff. Additionally, given the lack of supporting documentation, Evergy should be keeping detailed documentation of the estimates inserted.

Q. Is Staff recommending any type of adjustment to revenue or energy usage based upon EMM's use of estimated usage or its deviation from the currently approved methodology for the calculation thereof?

A. No. Due to the lack of detailed information from EMM, Staff cannot begin to calculate the impact of inserting estimated usage data or from the difference in methodology utilized by EMM. As I stated earlier in my testimony, Staff is reliant upon

information provided by EMM to make informed recommendations to the Commission. Staff's position is based upon EMM's inability to provide specific information regarding this topic.

Q. Was EMM asked to provide a total kWh or total dollar amount billed as estimated for the test year through the update period?

A. Yes. The data was requested but EMM was unable to provide the information because the data is "estimates, analysis, or calculations that have not been performed by the Company."[43]

Q. Has Staff attempted to determine the possible impact of inserting "estimated" usage but not identifying a customer's bill as "estimated" unless 33% or more of the data intervals are "estimated"?

A. Staff is continuing to collect information through discovery and may address it in future testimony.

Q. When an "estimated" interval's usage is not equal to the difference between known meter readings before and after the missing interval ("scalar usage"), is there an "error threshold" that initiates a manual analysis by EMM personnel?

A. Yes. If the amount of estimated usage is ±33 kWh from the scalar usage, a billing exception is created for EMM's billing department to review.[44]

Q. When was the "error threshold" established and how was it determined to be reasonable?

[43] Company response to Staff Data Request 0219.1.
[44] Company response to Staff Data Request 0219.3.

A. Beginning in 2018, the error threshold was ±18 kWh, and in May 2026 the threshold was re-evaluated and changed to ±33 kWh.[45] To determine this new threshold amount of kWh:

> Evergy recently did an analysis of the effort to complete billing exceptions and the value of the changes to the bill. The team reviewed the average time to work the exception and the cost associated with the employees' time to complete. The average cost to work an 8-minute exception is approximately $4.54. The conservative average of residential rates is $0.13 per kWh and therefore a breakeven amount is approximately 34 kWh. [46]

Q. If the difference in estimated interval data inserted is less than the "error threshold," when and how is that amount of kWh reconciled for the customer?

A. If the difference between the scalar usage and the interval usage is below ±33 kWh for the current billing period, an exception will not be generated and there will be no change to the bill or usage.[47]

Q. If the difference in estimated interval data inserted is greater than the "error threshold," when and how is that amount of kWh reconciled for the customer?

A. EMM's billing team reviews and corrects the error during the same bill period. To correct the estimate that generated an error, EMM's billing team will review the error and adjust the intervals to match the scalar usage for the bill period.[48]

[45] Ibid.
[46] Ibid.
[47] Ibid.
[48] Ibid.

Q. When a manual review by EMM personnel is performed, how does EMM allocate kWh when multiple time-based rate periods are involved in the questioned interval?

A. The EMM billing team resolves the error by manually entering the billing period and total measured usage. The "MDM then allocates this usage across all intervals within the current billing period to ensure the interval totals reconcile to the scalar (start and end) usage."[49] This allocation across all intervals creates billing discrepancies due to the usage not being billed in the time period (peak vs off-peak) of its actual usage.

Q. During the test year and update period, how many manual reviews have been performed by EMM personnel?

A. From October 2024 through June 15, 2026, EMM conducted 15,365 reviews due to estimated interval usage errors that equaled or exceeded ±33 kWh.[50] This creates an average of approximately 750 reviews per month. The majority of these reviews were conducted while the "error threshold" was ±18 kWh.

Q. Has Staff attempted to determine the possible impact of the continued use of a ±33 kWh "error threshold"?

A. EMM's response to Staff's Data Request was received on June 24, 2026. As of the date of this testimony preparation, Staff is continuing to collect information through discovery and may address it in future testimony.

[49] Ibid.
[50] Ibid.

Q. Does Staff have any recommendations on this subject?

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

1. Use the estimated usage methodology stated in its current Commission-approved tariff because EMM's present missing-interval estimation process does not appear to match the estimation procedure approved in its tariff;
2. Alternatively, the Commission should require EMM to file revised tariff language accurately describing the estimation methodology it actually uses and to show that the methodology is reasonable for ratepayers;
3. Continue attempting to obtain missing interval data and to adjust customer bills when actual data becomes available;
4. Maintain records of missing intervals, inserted estimated usage, the data supporting each estimate, and the circumstances requiring estimation; and;
5. Identify bills containing estimated usage and report to the Commission and Staff the level of usage and revenue being estimated.

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 RANDALL T. JENNINGS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW RANDALL T. JENNINGS and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Direct Testimony-Revenue Requirement*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

RANDALL T. JENNINGS

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 25th 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

Notary Public

Randall Jennings

Present Position:

I began employment with the Missouri Public Service Commission in October 2021 as a Utility Regulatory Auditor and was later promoted to the position of Senior Utility Regulatory Auditor; both in the Financial Analysis Department of the Financial and Business Analysis Division. In July 2024 I moved to the Tariff and Rate Design Department of the Industry Analysis Division as a Research and Data Analyst and in November 2025, I was promoted to the position of Senior Research and Data Analyst with the same department.

Educational Background and Work Experience:

I earned a Bachelor of Science degree in Business Administration from Drury University in Springfield, MO. I was previously employed as a Regulatory Auditor and Supervisor with the Missouri Division of Professional Registration for 11 years and prior to that as an Investigator for the Missouri Attorney General for 8 years.

Case Participation:

Company Name	Case Number	Case Type / Type of Testimony or Filing	Utility
The Raytown Water Company	WF-2021-0427	Finance – Staff Memorandum	Water
Evergy Missouri West, Inc., d/b/a Evergy Missouri West	EF-2022-0103	Finance – Staff Memorandum	Electric
Summit Natural Gas of Missouri, Inc.	GR-2022-0122	Tariff Revision – Rebuttal & Surrebuttal Testimony	Gas
Missouri American Water Company	WF-2022-0161	Finance – Staff Memorandum	Water
Union Electric Company, d/b/a Ameren Missouri	EF-2022-0164	Finance – Staff Memorandum Financing Compliance – Staff Memorandum	Electric
Spire Missouri Inc.	GF-2022-0169	Finance – Staff Memorandum	Gas
Summit Natural Gas of Missouri, Inc.	GF-2022-0216	Finance – Staff Memorandum	Gas
S.K. & M. Water and Sewer Company	SR-2022-0239 WR-2022-0240	Rate Case – Staff Memorandum	Water
Missouri American Water Company	WR-2022-0303	Rate Case – Direct, Rebuttal & Surrebuttal Testimony	Water
Argyle Estates Water Supply	WR-2022-0345	Rate Case – Staff Memorandum	Water
Confluence Rivers Utility Operating Company, Inc.	WA-2023-0026	CCN – Staff Recommendation	Water
Liberty Utilities (Midstates Natural Gas) Corp., d/b/a Liberty	GF-2023-0280	Finance – Staff Memorandum	Gas
Confluence Rivers Utility Operating Company, Inc.	WA-2023-0284	CCN – Staff Recommendation	Water
The Raytown Water Company	WR-2023-0344	Rate Case – Direct, Rebuttal & Surrebuttal Testimony	Water
Evergy Metro Inc., d/b/a Evergy Missouri Metro	EF-2023-0425	Finance – Staff Memorandum	Electric
Union Electric Company, d/b/a Ameren Missouri	EO-2023-0448	Nuclear Decommissioning – Rebuttal & Surrebuttal Testimony	Electric
Evergy Missouri West, Inc., d/b/a Evergy Missouri West	ER-2024-0189	RESRAM Prudence – Staff Memorandum	Electric
The Empire District Electric Company d/b/a Liberty	ER-2024-0261	Rate Case – Direct and Rebuttal Testimony	Electric

Company Name	Case Number	Case Type / Type of Testimony or Filing	Utility
Evergy Missouri West, Inc., d/b/a Evergy Missouri West	EA-2024-0292	CCN – Staff Recommendation	Electric
Union Electric Company, d/b/a Ameren Missouri	ER-2024-0319	RESRAM Prudence – Staff Memorandum	Electric
Holtgrewe Farms Water Company, LLC	SR-2024-0344 WR-2024-0343	Rate Case – Staff Memorandum	Sewer Water
Missouri American Water Company	WF-2024-0353	Finance – Staff Memorandum	Water
Union Electric Company, d/b/a Ameren Missouri	ER-2025-0119	RESRAM Adjustment Mechanism – Memorandum	Electric
Evergy Missouri West, Inc., d/b/a Evergy Missouri West	ET-2025-0121	RESRAM Tariff Sheet – Memorandum	Electric
Evergy Missouri Metro, Inc., d/b/a Evergy Missouri Metro	EO-2025-0173	DSIM Rider Rate Adjustment and Rate Tariff Sheet – Memorandum	Electric
Evergy Missouri West, Inc., d/b/a Evergy Missouri West	EO-2025-0174	DSIM Rider Rate Adjustment and Rate Tariff Sheet – Memorandum	Electric
Evergy Missouri West, Inc. Evergy Missouri Metro, Inc.	EE-2025-0084	Tariff Variances	Electric
Union Electric Company, d/b/a Ameren Missouri	EA-2025-0239	CCN – Staff Recommendation	Electric
The Empire District Electric Company d/b/a Liberty	EA-2025-0299	CCN – Staff Recommendation	Electric
Evergy Missouri Metro, Inc., d/b/a Evergy Missouri Metro	EO-2025-0325	DSIM Rider Rate Adjustment and Rate Tariff Sheet – Memorandum	Electric
Evergy Missouri West, Inc., d/b/a Evergy Missouri West	EO-2025-0326	DSIM Rider Rate Adjustment and Rate Tariff Sheet – Memorandum	Electric
Union Electric Company, d/b/a Ameren Missouri	ER-2026-0081	RESRAM Adjustment Mechanism – Memorandum	Electric
Evergy Missouri West, Inc., d/b/a Evergy Missouri West	ET-2026-0086	RESRAM Adjustment Mechanism – Memorandum	Electric
Evergy Missouri Metro, Inc., d/b/a Evergy Missouri Metro	EO-2026-0138	DSIM Rider Rate Adjustment and Rate Tariff Sheet – Memorandum	Electric
Evergy Missouri West, Inc., d/b/a Evergy Missouri West	EO-2026-0139	DSIM Rider Rate Adjustment and Rate Tariff Sheet – Memorandum	Electric