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Service Commission

Exhibit No. 109

Staff – Exhibit 109
Direct Testimony of J Luebbert
Case No. ER-2026-0143

Exhibit No.:
Issue(s): *Additional SPP expense*
Witness: *J Luebbert*
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

TARIFF / RATE DESIGN DEPARTMENT

DIRECT TESTIMONY
REVENUE REQUIREMENT

OF

J LUEBBERT
EVERGY MISSOURI WEST, INC.,
d/b/a Evergy Missouri West

CASE NO. ER-2026-0143

Jefferson City, Missouri
June 2026

DIRECT TESTIMONY

OF

J LUEBBERT

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

CASE NO. ER-2026-0143

Q. Please state your name and business address.

A. My name is J Luebbert and I am employed by the Missouri Public Service Commission as the Manager of the Tariff/Rate Design department of the Commission Staff. My business address is 200 Madison Street, Jefferson City, Missouri 65101. A list of cases that I have participated in before the Commission are attached as Schedule JL-d1.

Q. What is the purpose of your direct testimony?

A. My direct testimony will describe the estimated Southwest Power Pool ("SPP") transmission related expenses that may be expected from new or increased load from new customers. Generally, the expenses are separated into energy-based charges and demand-based charges in accordance with the SPP assessment of transmission costs. Staff witness Sarah Lange includes the aggregated energy rates and demand rates in Staff's revenue plug amount to net expenses from revenues.

Q. Do the estimated rates account for energy expense for serving load through SPP's Integrated Marketplace or additional capacity costs to meet SPP resource adequacy requirements?

A. No. The estimated rates that I provide only account for incremental SPP transmission expense related to incremental load.

Q. What SPP transmission rates did you utilize to quantify the rate for energy components?

A. For energy components, I utilized the rates included in SPP's Open Access Transmission Tariff ("OATT") price matrix[1] for the following rate schedules:

- Schedule 1-A2: Transmission Congestion Rights Administrative Service
- Schedule 1-A3: Integrated Marketplace Clearing Administrative Service
- Schedule 1-A4: Integrated Marketplace Facilitation Administrative Service
- Schedule 12: FERC Assessment Charge

Q. What SPP transmission expenses did you utilize to quantify the rate for demand components?

A. For demand components, I utilized the rates included in SPP's Open Access Transmission Tariff ("OATT") price matrix for Schedule 1-A1 (Transmission Administrative Service) and the following rates derived from SPP Revenue Requirement and Rates file for May 2026[2] in accordance with the OATT:

- Schedule 1: System Control and Dispatch Service (Network Integration Transmission Service)

[1]https://opsportal.spp.org/PriceMatrix
[2]https://www.spp.org/Documents/76683/RRR%20For%20Bills%20May%202026%20Revenue%20Requirements%20and%20Rates.xlsx

- Addendum 1 to Schedule 1: Tariff Administration Services (Allocation of Through and Out Service)
- Schedule 9: Revenues related to network integrated transmission (Zonal Annual Transmission Revenue Requirement)
- Schedule 11: Revenues related to the base plan transmission upgrades (Region Wide Schedule 11 Point-to-Point Rate)

Q. Will the actual expenses incurred correspond precisely with the estimated expenses?

A. No, many of the demand based expenses are variable, and based upon the load ratio share of all SPP entities. Furthermore, I estimated the expense conservatively assuming the monthly demand coincided with the SPP hour of determination. Changing load from other entities, investment in the transmission system, and changes from the limited information provided in this case on load projections will all impact the realized SPP transmission expense.

Q. Do any of the rates used in Staff's estimation account for the impact of day-ahead forecasts and real-time operations of a given customer?

A. No. While Staff recognizes that there is a potential expense associated with the interaction of day-ahead and real-time, Staff is unable to quantify the impact given current information.

Q. On a $/kW basis, what is the average amount of transmission expense that varies based on EMM's demand?

A. For each month, that amount is $3.4058 per kW.

Q. On a $/kWh basis, what is the average amount of transmission expense that varies based on EMM's load?

A. That amount is $0.000219 per kWh.

Q. Does this conclude your testimony?

A. Yes.

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 J LUEBBERT

STATE OF MISSOURI	)	
	)	ss.
COUNTY OF COLE	)	

COMES NOW J LUEBBERT 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.

J LUEBBERT

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

Credentials and Background of
J Luebbert

I have a Bachelor of Science degree in Biological Engineering from the University of Missouri. My work experience prior to becoming of member of the Missouri Public Service Commission Staff includes three years of regulatory work for the Missouri Department of Natural Resources.

I am currently employed as the manager of the Tariff/Rate Design Department of the Industry Analysis Division of the Missouri Public Service Commission Staff. Prior to holding my current position, I was employed as Case Manager of the Commission Staff Division, Associate Engineer of the Engineering Analysis Department of the Industry Analysis Division, and as a Utility Engineering Specialist III in the Energy Resources Department of the Commission Staff Division. I have been employed at the Missouri Public Service Commission since March 2016 and am responsible for preparing staff recommendations and ensuring that Staff presents recommendations in a neutral, independent manner to inform the Commission of Staff's position and possible alternatives.

Case Participation of
J Luebbert

Case Number	Company	Issues
EO-2015-0055	Ameren Missouri	Evaluation, Measurement, and Verification
EO-2016-0223	Empire District Electric Company	Integrated Resource Planning Requirements
EO-2016-0228	Ameren Missouri	Utilization of Generation Capacity, Plant Outages, and Demand Response Program
ER-2016-0179	Ameren Missouri	Heat Rate Testing
ER-2016-0285	Kansas City Power & Light Company	Heat Rate Testing

cont'd Case Participation
J Luebbert

Case Number	Company	Issues
EO-2017-0065	Empire District Electric Company	Utilization of Generation Capacity and Station Outages
EO-2017-0231	Kansas City Power & Light Company	Utilization of Generation Capacity, Heat Rates, and Plant Outages
EO-2017-0232	KCP&L Greater Missouri Operations Company	Utilization of Generation Capacity, Heat Rates, and Plant Outages
EO-2018-0038	Ameren Missouri	Integrated Resource Planning Requirements
EO-2018-0067	Ameren Missouri	Utilization of Generation Capacity, Heat Rates, and Plant Outages
EO-2018-0211	Ameren Missouri	Avoided Costs and Demand Response Programs
EA-2019-0010	Empire District Electric Company	Market Protection Provision
GO-2019-0115	Spire East	Policy
GO-2019-0116	Spire West	Policy
EO-2019-0132	Kansas City Power & Light Company	Avoided Cost, SPP resource adequacy requirements, and Demand Response Programs
ER-2019-0335	Ameren Missouri	Unregulated Competition Waivers and Class Cost Of Service
ER-2019-0374	Empire District Electric Company	SPP resource adequacy
EO-2020-0227	Evergy Missouri Metro	Demand Response programs
EO-2020-0228	Evergy Missouri West	Demand Response programs
EO-2020-0262	Evergy Missouri Metro	Demand Response programs
EO-2020-0263	Evergy Missouri West	Demand Response programs
EO-2020-0280	Evergy Missouri Metro	Integrated Resource Planning Requirements
EO-2020-0281	Evergy Missouri West	Integrated Resource Planning Requirements
EO-2021-0021	Ameren Missouri	Integrated Resource Planning Requirements
EO-2021-0032	Evergy	Renewable Generation and Retirements
GR-2021-0108	Spire Missouri	Metering and Combined Heat and Power
ET-2021-0151	Evergy	Capacity costs
ER-2021-0240	Ameren Missouri	Market Prices, Construction Audit, Smart Energy Plan, AMI
ER-2021-0312	Empire District Electric Company	Construction Audit, Market Price Protection, PISA Reporting

cont'd Case Participation
J Luebbert

Case Number	Company	Issues
EO-2022-0193	Empire District Electric Company	Retirement of Asbury
ER-2022-0129	Evergy Missouri Metro	MEEIA annualization
ER-2022-0130	Evergy Missouri West	MEEIA annualization, Schedule SIL revenue and incremental costs
EF-2022-0155	Evergy Missouri West	Customer event balancing
EC-2022-0315	Evergy Missouri West	Compliance with Stipulation and Agreement, Commission Order, and Schedule SIL
GR-2022-0179	Spire Missouri	Compressed Natural Gas
EA-2022-0244	Ameren Missouri	Huck Finn Solar CCN
EA-2022-0245	Ameren Missouri	Boomtown Solar CCN
EA-2022-0328	Evergy Missouri West	Persimmon Creek CCN
ER-2022-0337	Ameren Missouri	Billing determinant adjustments
EA-2023-0286	Ameren Missouri	Solar CCNs
EO-2024-0002	Evergy Missouri West Evergy Missouri Metro	Data retention
EO-2023-0136	Ameren Missouri	MEEIA program design, avoided costs
EO-2023-0369 EO-2023-0370	Evergy Missouri Metro Evergy Missouri West	MEEIA program design, tariffs
EA-2024-0237	Ameren Missouri	Economic Feasibility
ER-2024-0261	Empire District Electric Company	Large Load Customer Service tariff
EA-2024-0292	Evergy Missouri West	Economic Feasibility and Decisional Prudence
EA-2025-0075	Evergy Missouri West	Economic Feasibility and Decisional Prudence
EA-2025-0087	Ameren Transmission Company of Illinois	Economic Feasibility
EO-2025-0154	Evergy Missouri Metro Evergy Missouri West	Large Load Customer Service tariff / RTO impact
ET-2025-0184	Ameren Missouri	Large Load Customer Service tariff / RTO impact
EA-2025-0238	Ameren Missouri	Public interest
OO-2025-0233	Empire District Electric Company	Billing determinants and estimated interval data
EA-2025-0299	Empire District Electric Company	Decisional Prudence