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# Exhibit No. 115

Staff – Exhibit 115
Direct Testimony of Amanda Rucker
Case No. ER-2026-0143

*Exhibit No.:*
*Issue(s):* *Large Power Revenue*
*Witness:* *Amanda Rucker*
*Sponsoring Party:* *MoPSC Staff*
*Type of Exhibit:* *Direct Testimony*
*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

## AMANDA RUCKER

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

## CASE NO. ER-2026-0143

***Jefferson City, Missouri***
***June 2026***

*** Denotes Highly Confidential Information ***

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# DIRECT TESTIMONY OF

# AMANDA RUCKER

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**DIRECT TESTIMONY**

**OF**

**AMANDA RUCKER**

**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 Amanda Rucker, and my business address is 200 Madison Street, 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 an Economist for the Tariff/Rate Design Department in the Industry Analysis Division.

Q. Please describe your educational and work background.

A. I have my Master of Arts in Economics from the University of Missouri – Columbia. I also hold my Bachelor of Science in Actuarial Science and Statistics from the University of Central Missouri. My work experience prior to becoming a member of the Commission Staff includes two years as a Senior Research/Data Analyst at Missouri's Department of Labor and Industrial Relations – Division of Workers' Compensation, as well as four years in Research Analyst roles at Missouri's Office of State Courts Administrator.[1]

[1] See Schedule AR-d1.

## EXECUTIVE SUMMARY

Q. What is the purpose of your direct testimony?

A. The purpose of my direct testimony is to provide the rate revenues adjustments for Evergy Missouri Metro ("EMM") Large Power Service ("LPS") rate class which are applied to the update period revenues.[2]

## RATE REVENUES AND BILLING DETERMINANTS

Q. How does Staff determine the retail rate revenue for EMM rate classes?

A. Staff witness Kim Cox provides a detailed explanation of the rate revenues and billing determinants that are utilized by Staff. Please reference her testimony regarding how Staff defines these elements and how Staff uses them to determine the retail rate revenue.

Q. What revenue adjustments categories are utilized by Staff?

A. Staff made revenue adjustments based on the two major categories known as "normalization" and "annualization". Staff witness Kim Cox provides a definition of normalization and annualization in her testimony. In this testimony, I will specifically discuss the normalization and annualization adjustments evaluated for the LPS rate class in detail.

Q. What rate revenue adjustments did Staff evaluate for the LPS rate class?

A. Staff evaluated the following adjustments to the LPS rate class:

[2] The twelve months ending on December 31, 2025.

a. Update period adjustment

b. Removal of rate switchers adjustment

c. Weather normalization adjustment

d. 365-days adjustment

f. Missouri Energy Efficiency Investment Act ("MEEIA") adjustment

g. Annualization of rate switcher adjustment

Q. How did Staff calculate its update period adjustment?

A. Staff first calculated the test year revenue[3] based on the billing determinants provided by EMM. Staff requested and EMM provided the billing determinants for July 1, 2024 through June 30, 2025. Staff then calculated the revenue for the 12 months ending December 31, 2025. The update period adjustment is the difference of billed usage and revenue through December 31, 2025, compared to the billed usage and revenue through June 30, 2025.[4]

Q. What is the removal of rate switchers adjustment?

A. During the update period, two customers switched from LPS to the Large General Service ("LGS") rate class. To adjust for this change, Staff removed those customer's billing determinants and revenue from the LPS and added them to the LGS rate class.[5]

[3] Twelve months ending June 30, 2025.
[4] See HC Schedule AR-d2.
[5] Staff witness Kim Cox provides testimony on the customers added to the LGS rate class.

Q. How was the weather normalization adjustment completed?

A. Staff witness Michael Stahlman provided a weather normalization adjustment for specific weather sensitive LPS customers. This adjustment was made to the last block of usage for those that needed it. The weather normalization adjustment reflects the difference between the update period with rate switchers adjustments and the updates made based on that weather adjustment.

Q. How did Staff calculate the 365-Days adjustment?

A. The 365-Days adjustment exists because the billed revenue months for the customer do not often reflect the actual calendar month. Calendar months begin on the first day of the month and end on the last day. Using calendar months during non-leap years will result in 365 days of data in the period evaluated. The billed revenue month coincides with when the utility reads a customer's meter and issues the customer bill. For example, a billed revenue month of January may cover usage in December and January. Because the billing determinants provided by the company are based on the billed revenue month, this can result in more or less than 365 days of usage. Staff completed the 365-day adjustment to bring the revenue year usage (kWh) into a 365-day interval. Staff calculate a 365-day factor based on the difference in the customer's actual days of service from 365 days and dividing that by 365 days. That is then multiplied by each customer's kWh for the year to determine the 365-days kWh difference. The sum of the actual kWh and the 365-days kWh difference is divided by the actual kWh, giving Staff the days adjustment factor which is applied to the last block of energy usage for all customers in the rate class. The 365-days adjustment reflects the

difference between the adjustments made to the update period thus far and the updates made based on accounting for 365 days.

Q. Was a MEEIA adjustment needed for the LPS rate class?

A. Based on analysis completed by Staff witness Hari Poudel, there was no MEEIA adjustment needed for the LPS rate class customers during the update period.

**ANNUALIZATION OF RATE SWITCHER**

Q. For which customer was the rate switcher annualization needed?

A. For the purposes of testimony, Staff will reference this customer as Customer B.[6]

Q. Who is customer B?

A. Customer B is *** [redacted] ***

Q. What is the annualization completed for Customer B?

A. During the update period, Customer B switched from LGS to LPS. In order to make necessary annualization adjustments, Staff requested Customer B's billing determinants from EMM.[7] The demand and usage given by EMM for the months of *** [redacted] *** for that customer were used to calculate a monthly load factor for use in calculating annualized monthly energy sales.[8] Recognizing the growth of Customer B throughout the year , Staff calculated an average load factor

[6] Staff witness Sarah Lange also provides testimony on Customer B.
[7] Provided in Q0174S2_HC_CONFIDENTIAL - 26 MO Metro - LPS Actuals TYE 12312025 and Q0102.1_CONF_CONFIDENTIAL_LPS Billed Revenue - 26 MO METRO - UPDATE - TYE 12312025.
[8] Load factor represents the amount of energy used in a month, divided by the demand for that month multiplied by number of hours in that month.

and demand to use to annualize the billing determinants for the *** [redacted] ***. All months were adjusted to reflect the number of hours in a calendar month. For example, the billed month of January might be for the timeframe of December 31st to January 31st and would result in 32 days or 768 hours where, in the calendar month of January, there would only be 31 days or 744 hours. This allowed for the calculation of energy usage to only account for 365 days in the year evaluated. The earlier months used an average demand based on the later months in the update period, as well as annualized energy usage calculated using the hours in each month, the annualized demand, and the annualized load factor. These annualized billing determinants were then multiplied by the appropriate rate based on the block and season to calculate the annualized revenue for this customer. The adjustment reflects the amount of energy usage and revenue added by comparing the update period information for Customer B to the annualized information for Customer B.

**CONCLUSION**

Q. Once the LPS adjustments were completed, to whom did you provide the results?

A. I provided the LPS revenue and usage adjustments to Staff witness Kim Cox for a full analysis of the revenue rate adjustments of all EMM's rate classes. My results are presented in Ms. Cox's direct testimony. The normalized and annualized usage was provided to Staff witness Michael Stahlman for the Net System Input ("NSI") calculation, to Staff witness Alan Bax for his calculation of jurisdictional allocations, and to Staff

witness Brodrick Niemeier for production cost modeling. These witnesses provide more detail in their direct testimony. I also provided each revenue adjustment discussed above to Staff witness Sydney Ferguson to include in the overall revenue requirement.

Q. What is your recommendation?

A. Staff recommends that the Commission assign the revenue requirement based on the revenue adjustments provided in Staff witness Kim Cox's testimony, and as updated in true-up direct.

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 AMANDA RUCKER**

STATE OF MISSOURI )
) ss.
COUNTY OF COLE )

**COMES NOW AMANDA RUCKER** 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.

Amanda Rucker

**AMANDA RUCKER**

**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

D Suzie Mankin

Notary Public

**Credentials and Background of**

**Amanda Rucker**

I have my Master of Arts in Economics from the University of Missouri – Columbia. I also hold my Bachelor of Science in Actuarial Science and Statistics from the University of Central Missouri. My work experience prior to becoming a member of the Commission Staff includes two years as a Senior Research/Data Analyst at Missouri's Department of Labor and Industrial Relations – Division of Workers' Compensation, as well as 4 years in Research Analyst roles at Missouri's Office of State Courts Administrator.

# SCHEDULE AR-d2

# HAS BEEN DEEMED

# HIGHLY CONFIDENTIAL

# IN ITS ENTIRETY