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Exhibit No. 116

Staff – Exhibit 116
Direct Testimony of Trevor Rucker
Case No. ER-2026-0143

Exhibit No.:
Issue(s): *Plant-in-Service*
Witness: *Trevor Rucker*
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

ENGINEERING ANALYSIS DEPARTMENT

DIRECT TESTIMONY
REVENUE REQUIREMENT

OF

TREVOR RUCKER

EVERGY METRO, INC. D/B/A EVERGY MISSOURI METRO

CASE NO. ER-2026-0143

Jefferson City, Missouri
June 2026

** Denotes Confidential Information **

DIRECT TESTIMONY

OF

TREVOR RUCKER

EVERGY METRO, INC. D/B/A EVERGY MISSOURI METRO

CASE NO. ER-2026-0143

INTRODUCTION

Q. Please state your name and business address.

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

Q. What is your current position with the Missouri Public Service Commission ("Commission")?

A. I am an Associate Engineer in the Engineering Analysis Department of the Industry Analysis Division.

Q. Would you please review your educational background and work experience?

A. My credentials and a list of cases before the Commission in which I have previously provided testimony or analysis through affidavits are included in Schedule TR-d1.

Q. What is the purpose of your direct testimony?

A. In my direct testimony, I will discuss Evergy Missouri Metro's ("EMM") reporting requirements for plant-in-service projects and Staff's review of plant-in-service documentation.

PLANT-IN-SERVICE REPORTING

Q. What are EMM's current reporting requirements for plant-in-service?

A. Per the Stipulation and Agreement approved in Commission Case No. ER-2022-0129, EMM will annually file the following documentation in its capital budget docket (Commission Case No. EO-2019-0047) for projects over $5 million: purchase orders, change orders, final project cost summaries, project justification summary, oversight reviews, and in-service dates.

Q. Has EMM filed annually in its capital budget docket documentation for projects over $5 million?

A. EMM has provided documentation for projects costing over $5 million in Attachment 2 to its Capital Investment Report filings in its capital budget docket. In response to Staff Data Request No. 0377, EMM provided a list of projects costing over $1 million that were placed into service between June 1, 2022, and December 31, 2025.[1] During my review of the list of projects, I compared it to Attachment 2 to EMM's Capital Investment Report filings which includes projects with costs that exceeded $5 million. I identified a number of projects from the data request response list of projects that were over $5 million but were not included in Attachment 2 from the Capital Investment Report filing. In response to Staff Data Request No. 0377.1, EMM stated that the projects costing over $5 million that were excluded from EMM's

[1] See Schedule TR-d2 which includes EMM's response to Staff Data Request No. 0377, both the written response and the spreadsheet list of projects compiled by EMM.

filings were either part of a blanket project or the plant addition was less than $5 million after the Missouri jurisdictional allocation.

Additionally, during my review of documentation of projects costing over $5 million that were included in Attachment 2 to EMM's Capital Investment Report filings, I noted that purchase orders and change orders often include references to attached documents, or other documents (e.g. potential change orders), that are not included in EMM's filings. This additional documentation would provide Staff with insight and context for the purchase and change orders.

Q. What insight and context would the purchase order and change order documentation provide to Staff?

A. The documents referenced in the purchase orders and change orders are often used as the basis for the purchase or change order. The referenced documents include quotes, potential change orders, proposals, etc. The final purchase or change order documentation that only includes information such as a dollar value, line-item description, quantity, and references to other documents does not necessarily provide Staff with sufficient information to determine the reasonableness and prudence of decisions made by EMM.

Q. What are plant-in-service reporting requirements for other electric utilities?

A. Per the Stipulation and Agreement in Commission Case No. ER-2022-0337,[2] Ameren Missouri shall submit quarterly in Commission Case

[2] Paragraph 14 of the Stipulation and Agreement.

No. EO-2019-0044[3] the following information for energy delivery projects with an investment of $1 million or greater:

a. Purchase orders;
b. Change orders;
c. Final project cost summaries;
d. Project Notifications/Project Charters;
e. Oversight Committee review materials;
f. In-service dates; and
g. Evaluation results.[4]

Per the Stipulation and Agreement in Commission Case No. ER-2021-0312,[5] Empire District Electric Company shall file annually cost-benefit analysis and performance metrics for planned capital investments of greater than $1 million in its PISA docket.[6]

Q. Should any of the plant-in-service reporting requirements for other electric utilities be incorporated into EMM's plant-in-service reporting requirements?

A. Yes. Both Ameren Missouri and Empire District Electric Company provide information and documentation for projects costing greater than $1 million, so it would be reasonable for EMM to also provide information and documentation for projects costing greater than $1 million. Additionally, Ameren Missouri provides documentation

[3] Ameren Missouri's capital budget docket.
[4] Consistent with the evaluation methodologies for the subject categories developed pursuant to Item I, Paragraph 18, Subparagraph A of the Stipulation and Agreement approved in Commission Case No. ER-2021-0240.
[5] Paragraph 6 of the Fourth Partial Stipulation and Agreement.
[6] Commission Case No. EO-2019-0046 is Empire's capital budget docket (i.e. PISA docket).

quarterly. More frequent reporting reduces the amount of documentation that must be provided at one time, but also allows Staff to review documentation on a regular basis.

Q. How should EMM's reporting requirements from the Stipulation and Agreement approved in Commission Case No. ER-2022-0129 be modified to better align with the reporting requirements of other electric utilities and require additional information and documentation for projects?

A. Staff recommends that the Commission order that Evergy Missouri Metro quarterly file the following information and documentation in its capital budget docket (Commission Case No. EO-2019-0047) for all projects with an Evergy Missouri Metro jurisdictional cost over $1 million:

a. Original project cost (total and EMM allocated),
b. Final project cost (total and EMM allocated),
c. In-service date,
d. Project type,
e. Project category,
f. Project description,
g. Project justification summary,
h. Oversight reviews,
i. Purchase orders (including supporting, attached, and referenced documentation), and
j. Change orders (including supporting, attached, and referenced documentation).

PLANT-IN-SERVICE DOCUMENTATION REVIEW

Q. Can you describe your review of plant-in-service documentation?

A. I reviewed documentation that EMM provided in its capital budget docket[7] for projects costing over $5 million that were placed in-service between June 1, 2022, and December 31, 2025. I additionally reviewed a list of projects costing over $1 million placed in-service between June 1, 2022, and December 31, 2025,[8] a list of projects costing over $1 million placed in-service in 2026,[9] and requested documentation for a random sample of projects from those lists.[10] Staff will continue to review project documentation and will provide true-up direct testimony if necessary.

Q. During your review of plant-in-service documentation, did you identify any costs that may not have been reasonable and prudent?

A. I identified that as part of ** [redacted] **, costs related to game tables and accessories were included. Staff submitted Data Request No. 0382 to, in part, request 1) justification for the inclusion of those costs, 2) if those costs are being added to EMM's rate base in this case, and 3) documentation related to those costs. Despite EMM's response, I question if the cost for the game tables of $52,566.43 was reasonable. EMM provided a table that showed that $23,953.27 of the costs related to the game tables were allocated to the Missouri jurisdiction and are being included in rate base in this case.[11] EMM did not provide any additional documentation pertaining to the project or game tables. Staff has

[7] Commission Case No. EO-2019-0047.
[8] Staff Data Request No. 0377.
[9] Staff Data Request No. 0378.
[10] Staff Data Request Nos. 0377.3 and 0378.1.
[11] EMM's response to Staff Data Request No. 0382.

requested additional documentation and will provide true-up direct testimony if necessary.

Q. Have you identified any other costs that may not have been reasonably and prudently incurred?

A. As of the drafting of my direct testimony, I have not identified any other costs that may not have been reasonably or prudently incurred.

CONCLUSION

Q. Can you summarize your direct testimony?

A. In my direct testimony, I discussed EMM's plant-in-service reporting requirements, including a recommendation to modify EMM's plant-in-service reporting requirements from the Stipulation and Agreement approved in Commission Case No. ER-2022-0129 to provide additional information and documentation more frequently for projects costing more than $1 million for the EMM jurisdictional cost. I also discussed my review of plant-in-service documentation pertaining to projects placed in-service between June 1, 2022, and December 31, 2025.

Q. Does this conclude your direct 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 TREVOR RUCKER

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW TREVOR RUCKER 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.

TREVOR 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

Notary Public

Educational and Employment Background and Credentials
of
Trevor Rucker

I earned a Bachelor of Science in Nuclear Engineering with a minor in Mathematics from the Missouri University of Science and Technology in May 2017, and a Master of Business Administration with a concentration in Management from Maryville University in December 2019. I am registered as an Engineer Intern in Missouri. I began employment at the Missouri Public Service Commission ("Commission") in June 2018 as a Utility Operations Technical Specialist in the Water & Sewer Department. I was promoted to a Utility Engineering Specialist (renamed to Associate Engineer) in the Safety Engineering Department in December 2018. I transferred to the Engineering Analysis Department in May 2025 and am currently employed as an Associate Engineer.

The following is a listing of cases before the Commission in which I have previously provided testimony or analysis through affidavits:

Company	Case Number	Filing Description	EFIS Date Filed
Missouri-American Water Company	WC-2019-0004	Staff Report	10/5/2018
Missouri-American Water Company	WM-2019-0018	Staff Recommendation	11/16/2018
Roeslein Alternative Energy Services, LLC	GE-2020-0238	Staff Recommendation	4/7/2020
Spire Missouri, Inc.	GC-2021-0135	Staff Report	2/26/2021
City of New Florence, Missouri	GS-2017-0324	Progress Report	12/19/2022

Company	Case Number	Filing Description	EFIS Date Filed
Spire Missouri, Inc.	GS-2022-0047	Staff Report	11/15/2023
Spire Missouri, Inc.	GS-2022-0047	Staff's Reply	2/1/2024
Spire Missouri, Inc.	GC-2024-0260	Staff's Response	12/9/2024
Summit Natural Gas of Missouri, Inc.	GS-2025-0197	Incident Report	1/6/2025
Empire District Electric Company d/b/a Liberty	EC-2026-0048	Staff Report	11/14/2025
Union Electric Company d/b/a Ameren Missouri	EA-2025-0238	Staff Rebuttal Report	12/12/2025
Union Electric Company d/b/a Ameren Missouri	EA-2025-0238	Surrebuttal Testimony	1/16/2026
Evergy Metro Inc., d/b/a Evergy Missouri Metro	EC-2026-0064	Staff Report	1/30/2026
Union Electric Company d/b/a Ameren Missouri	EC-2026-0156	Staff Report	3/13/2026
Empire District Electric Company d/b/a Liberty	EA-2025-0299	Staff Rebuttal Report	5/7/2026

SCHEDULE TR-d2

HAS BEEN DEEMED

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