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Service Commission

Exhibit No. 134

Staff – Exhibit 134
Rebuttal Testimony of Stacy Henderson
Case No. ER-2026-0143

Exhibit No.:	
Issue(s):	*Fuel Adjustment Clause*
Witness:	*Stacy Henderson*
Sponsoring Party:	*MoPSC Staff*
Type of Exhibit:	*Rebuttal Testimony*
Case No.:	*ER-2026-0143*
Date Testimony Prepared:	*August 11, 2026*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

REBUTTAL TESTIMONY

OF

STACY HENDERSON

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

CASE NO. ER-2026-0143

Jefferson City, Missouri
August 2026

REBUTTAL TESTIMONY

OF

STACY HENDERSON

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 Stacy Henderson, and my business address is 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 Utility Regulatory Auditor.

Q. Are you the same Stacy Henderson who has previously provided testimony in this case?

A. Yes. I filed direct testimony in this case on June 30, 2026.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to respond to Evergy Missouri Metro, Inc. d/b/a Evergy Missouri Metro ("EMM") witness Linda J. Nunn's Fuel Adjustment Clause ("FAC") direct testimony in which she requests the continuation of the EMM's FAC, with modifications, as well as the Office of the Public Counsel ("OPC") witness Angela Schaben's direct testimony in regard to SPP administrative fees not currently recoverable through EMM's FAC.

RESPONSE TO EMM AND OPC

Q. EMM witness Ms. Nunn proposes to include in the FAC tariff sheets SPP charge types: Integrated Marketplace Administrative Services, Integrated Marketplace Clearing Administrative Service, and Integrated Marketplace Facilitation Administrative Service. Does Staff agree?

A. No. Staff's position is that the costs for these SPP charge types are not fluctuating fuel and purchased power costs, but instead are administrative costs, and should not flow through the FAC. This is consistent with the Commission's treatment of SPP administrative fees in past rate cases for Evergy Missouri Metro and Evergy Missouri West[1] and for other electric utilities.[2] OPC witness Angela Schaben also agrees with Staff's position that no SPP administration fees should be recoverable through the FAC.[3]

Q. EMM witness Ms. Nunn proposes to include in the FAC tariff sheets other SPP charge types (listed below). Does Staff oppose including those additional SPP charge types?

A. No, Staff does not oppose the following SPP charge types as they have already been included in prior "notices of adding new SPP charge types" filed in Case No. ER-2022-0129. These charge types are:

Day-Ahead Uncertainty Reserve Amount
Day-Ahead Uncertainty Reserve Distribution Amount
Day-Ahead Self-Incremental Energy Make Whole Payment Amount
Real-Time Uncertainty Reserve Amount
Real-Time Uncertainty Reserve Distribution Amount
Real-Time Uncertainty Reserve Non-Performance Amount

[1] Cases No. ER-2022-0129, ER-2022-0130 and ER-2024-0189.
[2] Case No's ER-2019-0374, ER-2021-0312 and ER-2024-0261.
[3] OPC witness Angela Schaben Direct Testimony filed on June 30, 2026, page 18 line 4 through line 13.

Real-Time Uncertainty Reserve Non-Performance Distribution Amount
Real-Time Uninstructed Resource Deviation Amount
Real Time Uninstructed Resource Deviation Distribution Amount
Real-Time Incremental Energy Make Whole Payment Amount
RUC Self-Incremental Energy Make Whole Payment Amount
Local Reliability Distribution Amount
Real-Time Regulation Service Adjustment Distribution Amount
Real-Time Pseudo Tie Distribution Amount
Day-Ahead TCR West DC Tie Funding Amount
Real-Time TCR West DC Tie Funding Amount
Real-Time Out-of-Merit Distribution Amount
Real-Time Price Correction Amount
Real-Time Price Correction Distribution Amount
Real-Time Joint Operating Agreement Distribution Amount
Incremental Market Efficiency Use (IMEU) Amount
Incremental Market Efficiency Use (IMEU) Distribution Amount
West DC Tie Federal Service Exemption Amount

Q. EMM witness Ms. Nunn proposes to change the Emissions definition Factor R in the FAC tariff sheet to Emissions and Environmental credit accounts, subaccounts 411.8, 411.9, 411.12, and 411.13. Does Staff agree?

A. Staff agrees with these updates being added to the FAC tariff. These updates to EMM are consistent with what was approved by the Commission in the most recent Evergy Missouri West general rate case, ER-2024-0189. It is also Staffs understanding that these updates reflect changes made by FERC related to emissions and environmental credits.

Q. EMM witness Ms. Nunn proposes to include a new definition in the FAC tariff sheets for retail revenue and includes accounts 440-444. Does Staff oppose this new definition?

A. Staff does not oppose including this new definition for retail revenues and accounts 440-444, because these accounts have been approved by the Commission to

be included in the FAC in a prior Stipulation and Agreement from Case No. EO-2025-0154, service to Large Load Customers. In this case, there were several riders approved, Schedule Alterative Energy Credit Rider ("AEC"), Renewable Energy Program Rider ("RENEW"), and Green Solutions Connection Rider ("GSR"), which allowed EMM to reflect cost offset for revenues from the Schedules RENEW, GSR, and AEC.

Q. EMM witness Ms. Nunn proposes to include FAC subaccount 501310, for glycol additives, and has also included language "storage and transportation" under subaccount 501000. Does Staff oppose this new addition?

A. Staff does not oppose this new subaccount 501310 for glycol additives or including the additional language for storage and transportation in account 501000. EMM indicates in DR 323, accounting created 501310 so they can have a separate expense account for fuel additives that are applied to the coal versus fuel additives that are used for air quality control purposes in 501300; glycol is a chemical that is sprayed on the coal on the belt on its way to the unit which prevents coal from freezing in low temperatures. Therefore, Staff believes the glycol additive is related to fuel additives which is already included in the FAC. Also, the storage and transportation costs language is already included in the description of account 547, therefore Staff does not oppose account 501 fuel description being consistent with account 547.

Q. Does this conclude your rebuttal 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 STACY L. HENDERSON

STATE OF MISSOURI	)	
	)	ss.
COUNTY OF COLE	)	

COMES NOW STACY L. HENDERSON and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Stacy L. Henderson* form; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

STACY L. HENDERSON

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 6th day of August 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