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Exhibit No. 151

Staff – Exhibit 151
True-Up Surrebuttal Direct Testimony of Kim Cox
Case No. ER-2026-0143

Exhibit No.:	
Issue(s):	*Customer Growth, Energy Efficiency*
Witness:	*Kim Cox*
Sponsoring Party:	*MoPSC Staff*
Type of Exhibit:	*Surrebuttal / True-Up Direct Testimony*
Case No.:	*ER-2026-0143*
Date Testimony Prepared:	*September 10, 2026*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

SURREBUTTAL / TRUE-UP DIRECT TESTIMONY

OF

KIM COX

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

CASE NO. ER-2026-0143

Jefferson City, Missouri
September 2026

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KIM COX

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

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SURREBUTTAL / TRUE-UP DIRECT TESTIMONY

OF

KIM COX

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 Kim Cox, 200 Madison Street, Jefferson City, Missouri 65101.

Q. Are you the same Kim Cox who filed direct and rebuttal testimony in this case?

A. Yes. I provided direct testimony in this proceeding on June 16, 2026, and rebuttal testimony on August 11, 2026.

SURREBUTTAL

Q. What is the purpose of your surrebuttal testimony?

A. To respond to Evergy Missouri Metro ("EMM") witness, Graham A. Jaynes, on normalization of retail revenues and EMM witness, Albert R. Bass, Jr., rebuttal testimony on customer growth.

NORMALIZATION OF RETAIL REVENUES

Q. Does Staff agree with Mr. Jaynes that the differences between EMM and Staff's revenue normalization and annualization adjustments are from certain calculation factors driven by application and timing assumptions?[1]

[1] EMM witness, Graham A. Jaynes, rebuttal testimony, page 3, lines 8-18.

A. Not completely. Staff does agree that the growth and energy efficiency factors should be updated at true-up, however, Staff does not agree that the normalization and annualization factors are the only differences. As noted in my rebuttal testimony:

a. Staff has concerns about the accuracy of the bill counts and customer charge counts and recommends the Commission order EMM to add the definitions to the tariff and continue to provide both counts in general rate cases.

b. EMM applied the actual percentage of usage in each block to the weather normalized usage. Mr. Bass acknowledges that he does not disagree with Staff's description of the rate block adjustment and goes on to say that he has no adjustment to propose to the process.[2] By applying the actual percent of usage, the revenues may be over or under collected. Every revenue adjustment made after the weather normalization is impacted. Staff recommends the Commission's order include Staff's billing determinants and retail revenue adjustments that allocate normal usage to the normalized blocks.

GROWTH ADJUSTMENT

Q. Mr. Bass stated[3] that he would explain how EMM's annualization of customer growth differs from Staff. He went on to say that the difference was that

[2] EMM witness, Albert R. Bass, Jr., rebuttal testimony, page 5, lines 2-5.
[3] EMM witness, Albert R. Bass, Jr., rebuttal testimony, page 2, lines 13 and 14.

EMM projected customer counts to the true-up date of June 2026 and Staff failed to account for customer growth through the true-up period.[4] Does Staff agree with his assertion that the notable difference[5] is Staff not accounting for customer growth through the true-up period?

A. No. As stated in my rebuttal testimony,[6] Staff does not agree that, (1) the rate codes should be combined to calculate growth, (2) the bill count should be utilized to distribute the different level of customer charges, or (3) that the new residential rate codes that still will not have a full twelve months of billing determinants at true-up only be adjusted for growth with existing billing determinants. It is also note-worthy that in my direct testimony,[7] I state that Staff will analyze the customer charge counts through the true-up period and adjust accordingly in true-up direct. This process has been Staff's method for accounting for growth through the true-up for the last several rate cases.

TRUE-UP DIRECT

Q. What is the purpose of your true-up direct testimony:

A. The purpose of my true-up direct testimony is to address the customer growth adjustment and the energy efficiency annualization adjustment.

CUSTOMER GROWTH ADJUSTMENT

Q. Did Staff make a true-up customer growth adjustment?

[4] EMM witness, Albert R. Bass, Jr., rebuttal testimony, page 7, lines 16-22.
[5] EMM witness, Albert R. Bass, Jr., rebuttal testimony, page 7, lines 10 and 11.
[6] Kim Cox, rebuttal testimony, page 12, lines 10-15.
[7] Kim Cox, direct testimony, page 7, lines 10-11.

A. Yes. Staff made a true-up growth adjustment to EMM's residential, small general service ("SGS"), medium general service ("MGS") and large general service ("LGS") rate classes. The adjustment reflects the level of kWh sales, kW demand and rate revenue that would have occurred if the number of customers taking service at the end of June 2026 had existed throughout the entire 12 months ending June 2025.

ENERGY EFFICIENCY ADJUSTMENT

Q. Did Staff make a true-up energy efficiency adjustment?

A. Yes. Staff witness, Hari K. Poudel, Ph.D., provided true-up energy efficiency adjustments. The revenue calculations can be found in workpaper "HIGHLY CONFIDENTIAL ER-2026-0143 Evergy Missouri Metro Revenues True-up." Mr. Poudel discusses these adjustments in his true-up testimony.

CONCLUSION

Q. What is Staff's conclusion of the surrebuttal and direct true-up issues discussed in this testimony?

A. Staff recommends that the Commission

a. order EMM to provide the bill count and customer charge count in future rate cases,

b. accept Staff's weather normalization blocks,[8]

c. accept Staff's growth adjustment, and

d. accept Staff's energy efficiency adjustment.

[8] EMM did not propose weather normalized blocks.

Q. What are your recommended rate revenue adjustments?

A. The Commission should base its awarded revenue requirement on Staff's revenue adjustments as provided in Schedule KC-td1.[9]

Q. Does this conclude your surrebuttal and true-up direct testimony?

A. Yes.

[9] Staff's true-up normalized and annualized billing determinants are included.

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 KIM COX

STATE OF MISSOURI	)	
	)	ss.
COUNTY OF COLE	)	

COMES NOW KIM COX and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Surrebuttal / True-Up Direct Testimony of Kim Cox*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Kim Cox

KIM COX

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 2nd day of September 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

	Test Year As Billed	Update Period Adjustment	Large Customer Annualization - provided by witness Amanda Rucker	Rate Switcher Adjustment	Weather Normalization Adjustment
Residential	$ 352,521,419.86	$ 6,287,708.77			$ 5,935,186.74
Small GS	$ 86,758,047.83	$ 2,111,243.01			$ 176,937.90
Medium GS	$ 127,521,337.80	$ (654,647.86)			$ (371,672.15)
Large GS	$ 188,226,154.92	$ 2,082,462.88		$ (486,670.91)	$ (191,529.60)
Large Power (Witness Amanda Rucker)	$ 120,766,801.20	$ (457,145.32)	$ 3,351,579.00	$ 392,276.16	$ (54,014.64)
Lighting (Witness Randall Jennings)	$ 7,823,474.88	$ (40,009.08)			
CCN	$ 516,409.93	$ 83,609.63			
Total	$ 884,133,646.42	$ 9,413,222.05	$ 3,351,579.00	$ (94,394.75)	$ 5,494,908.25

	365 Day Adjustment	MEEIA Adjustment	Growth Adjustment	EDR -provided by witness Hari Poudel	Total Revenue
Residential	$ (1,588,450.46)	$ (32,467.17)	$ 3,255,623.25		$ 366,379,020.99
Small GS	$ (378,447.83)	$ (108,422.41)	$ 200,478.70	$ (2,182.00)	$ 88,756,024.34
Medium GS	$ (464,756.11)	$ (83,558.45)	$ (1,347,111.45)	$ (132,760.00)	$ 124,490,689.94
Large GS	$ (623,494.35)	$ (99,188.76)	$ 1,570,155.00	$ (133,872.00)	$ 190,317,986.22
Large Power (Witness Amanda Rucker)	$ (64,435.56)				$ 123,935,060.85
Lighting (Witness Randall Jennings)			$ 61,615.28		$ 7,845,081.08
CCN	$ (4,500.08)		$ 65,959.88		$ 661,479.36
Total	$ (3,124,084.39)	$ (323,636.79)	$ 3,806,720.68	$ (268,814.00)	$ 902,385,342.79

CASE NO. ER-2026-0143
Metro Normalized and Annualized Billing Determinants

Residential

1RS1A

	Summer kWh	Winter kWh
Customer Charge	4,922.12	9,844.23
600 kWh	2,615,683.24	4,574,687.44
next 400 kWh	1,502,226.75	1,808,159.54
over 1000 kWh	2,446,053.47	3,220,380.93
Total	6,563,963.46	9,603,227.91

RPKA

	Summer kWh	Winter kWh
Customer Charge	935,219.45	1,870,438.89
600 kWh	485,893,844.50	866,338,702.37
next 400 kWh	205,723,071.42	255,129,660.04
over 1000 kWh	245,347,972.87	368,482,134.48
Peak adj charge on-peak kWh	219,086,579.95	284,459,305.59
Peak adj credit super off-pea	165,563,147.79	319,681,326.54
Total	936,964,888.79	1,489,950,496.90

RPKAS

	Summer kWh	Winter kWh
Customer Charge	1,838.80	3,677.60
600 kWh	816,197.18	1,389,335.35
next 400 kWh	273,646.16	397,223.97
over 1000 kWh	256,688.23	597,324.26
Peak adj charge on-peak kWh	505,627.88	608,077.82
Peak adj credit super off-pea	428,113.52	696,950.85
Access Charge	945,006.13	1,092,325.30
Farm Block	1,890,012.26	2,184,650.60
Solar credit charge	(27,057.65)	(64,268.21)
Battery	12.00	24.00
Total	1,346,531.57	2,383,883.58

RPKALIS

	Summer kWh	Winter kWh
Customer Charge	108.00	216.00
600 kWh	36,784.44	68,661.33
next 400 kWh	8,111.11	22,296.46
over 1000 kWh	17,312.28	69,646.92
Peak adj charge on-peak kWh	25,239.90	37,338.11
Peak adj credit super off-pea	21,333.15	48,461.59
Access Charge	73,700.94	82,715.20
Farm Block	73,700.94	82,715.20
Total	62,207.82	160,604.71

CASE NO. ER-2026-0143
Metro Normalized and Annualized Billing Determinants

Residential

RPKANM

	Summer kWh	Winter kWh
Customer Charge	15,982.27	31,964.53
600 kWh	6,422,872.45	10,340,909.56
next 400 kWh	2,151,243.59	3,337,139.92
over 1000 kWh	2,710,540.69	8,238,748.29
Peak adj charge on-peak kW	3,192,446.23	5,291,387.92
Peak adj credit super off-pe	3,965,135.27	7,759,600.21
Net metering	(1,189,265.73)	(1,798,429.69)
Battery	72	144
Total	11,284,656.74	21,916,797.77

RTOU

	Summer kWh	Winter kWh
Customer Charge	20,364.27	40,728.53
PEAK	2,933,086.65	3,477,820.74
OFF-PEAK	13,010,653.56	18,222,899.68
SUPER OFF-PEAK	4,031,556.39	6,364,798.41
Battery	4.00	8.00
Total	19,975,296.60	28,065,518.84

RTOUN

	Summer kWh	Winter kWh
Customer Charge	40.00	80.00
PEAK	5,000.67	8,829.30
OFF-PEAK	21,010.85	49,172.48
SUPER OFF-PEAK	12,468.97	39,764.09
Total	38,480.49	97,765.87

RTOU2

	Summer kWh	Winter kWh
Customer Charge	81,387.34	162,774.67
PEAK	12,936,917.52	-
OFF-PEAK	68,132,189.86	85,721,484.42
SUPER OFF-PEAK	-	21,472,365.34
Battery	4.00	8.00
Total	81,069,107.38	107,193,849.75

RTOU2N

	Summer kWh	Winter kWh
Customer Charge	120.00	240.00
PEAK	10,648.71	
OFF-PEAK	72,409.61	63,934.43
SUPER OFF-PEAK		45,648.40
Total	83,058.32	109,582.83

CASE NO. ER-2026-0143
Metro Normalized and Annualized Billing Determinants

Residential

RTOU3

	Summer kWh	Winter kWh
Customer Charge	35,490.53	70,981.06
PEAK	4,927,539.19	6,120,411.92
OFF-PEAK	22,910,489.28	33,805,878.89
SUPER OFF-PEAK	8,134,633.34	13,543,442.63
Battery	28.00	56.00
Total	35,972,661.81	53,469,733.44

RTOU3N

	Summer kWh	Winter kWh
Customer Charge	226.40	452.80
PEAK	10,868.01	24,033.85
OFF-PEAK	44,940.56	94,187.96
SUPER OFF-PEAK	79,142.60	135,789.12
Total	134,951.17	254,010.93

RTOU-EV

	Summer kWh	Winter kWh
Customer Charge	36.00	72.00
PEAK	695.21	2,035.33
OFF-PEAK	2,941.56	7,679.18
SUPER OFF-PEAK	2,079.00	7,684.29
Total	5,715.77	17,398.80

Small General Service

SGSE

	Summer kWh	Winter kWh
Customer Charge		
0-24 kW	96,064.22	192,302.04
25-199 kW	8,898.21	17,649.77
200-999 kW	519.40	1,012.87
1000 kW or above	16.04	31.06
Unmetered	-	-
Energy	-	-
First 180	144,706,624.33	251,834,261.16
Next 180	77,130,726.47	127,177,065.79
Over 360	27,030,161.29	48,394,401.31
Facilites		
First 25 kW	857,863.90	1,713,908.61
All kW over 25	436,750.10	861,252.46
Net metering	(423,752.24)	(449,847.65)
Parallel	(42,073.69)	(36,113.15)
Total	248,867,512.10	427,405,728.26

CASE NO. ER-2026-0143
Metro Normalized and Annualized Billing Determinants

Small General Service

SGSES

	Summer kWh	Winter kWh
Customer Charge		
0-24 kW	4.00	8.00
25-199 kW	4.00	8.00
200-999 kW	-	-
1000 kW or above	-	-
Unmetered	-	-
Energy		
First 180	20,199.19	20,259.70
Next 180	-	1,253.61
Over 360	-	5.24
Facilites		
First 25 kW	151.29	301.05
All kW over 25	143.53	281.42
Solar		
Solar Access	23,095.93	26,711.90
Solar Block	46,191.86	53,423.80
Solar credit	-	(997.80)
Total	20,199.19	21,518.55

SUSE

	Summer kWh	Winter kWh
Customer Charge		
0-24 kW	-	-
25-199 kW	-	-
200-999 kW	-	-
1000 kW or above	-	-
Unmetered	4,336.00	8,672.00
Energy		
First 180	1,192,936.29	2,357,016.33
Next 180	732,386.06	1,502,198.68
Over 360	41,574.83	89,753.47
Facilites		
First 25 kW	8,697.36	17,392.65
All kW over 25	-	-
Total	1,966,897.17	3,948,968.48

SGSF

	Summer kWh	Winter kWh
Customer Charge		
0-24 kW	135.12	263.40
25-199 kW	29.33	64.02
200-999 kW	19.55	40.58
1000 kW or above	-	-
Energy		
First 180	1,151,583.30	2,477,108.46
Next 180	820,621.47	1,957,687.99
Over 360	637,303.36	2,144,122.75
Facilites		
First 25 kW	2,607.34	5,417.05
All kW over 25	6,167.11	16,750.39
Net Metering	(1,017.27)	(15,895.32)
Total	2,609,508.13	6,578,919.20

CASE NO. ER-2026-0143
Metro Normalized and Annualized Billing Determinants

Small General Service

SGAE

	Summer kWh	Winter kWh
Customer Charge		
0-24 kW	1,012.09	2,015.33
25-199 kW	207.91	424.67
200-999 kW	-	-
1000 kW or above	-	-
Energy		
First 180	1,580,041.00	3,709,438.24
Next 180	675,441.54	1,416,264.33
Over 360	277,482.99	679,977.14
Facilites		
First 25 kW	16,398.46	33,002.60
All kW over 25	4,332.59	8,407.53
Net metering	(10,654.26)	(5,831.65)
Total	2,532,965.53	5,805,679.71

Medium General Service

MGSE

	Summer kWh	Winter kWh
Customer Charge		
0-24 kW	-	-
25-199 kW	17,967.18	35,908.80
200-999 kW	1,028.38	2,079.46
1000 kW or above	33.90	70.67
Energy		
First 180	192,136,180.48	333,657,521.94
Next 180	130,270,048.20	213,894,675.51
Over 360	38,990,267.14	60,436,632.81
Facilites		
Per kW of facilites demand per	1,446,346.48	2,889,611.16
Demand Charge		
Per KW of billing demand per	1,180,045.47	2,121,583.61
Reactive Demand Adj	80,910.23	125,967.69
Net metering	(138,175.96)	(180,027.96)
Parallel	(257,768.68)	(259,100.99)
Total	361,396,495.82	607,988,830.26

MGSF

	Summer kWh	Winter kWh
Customer Charge		
0-24 kW	-	-
25-199 kW	116.12	230.61
200-999 kW	22.93	45.57
1000 kW or above	20.95	43.82
Energy	-	-
First 180	9,019,583.65	19,157,655.24
Next 180	5,031,441.52	8,645,039.59
Over 360	2,008,928.31	3,159,291.26
Facilites		
Per kW of facilites demand per	81,330.91	165,114.49
Demand Charge		
Per KW of billing demand per	55,759.46	115,554.30
Reactive Demand Adj	13,072.19	28,891.50
Net metering	(7,670.33)	(1,840.60)
Total	16,059,953.48	30,961,986.09

CASE NO. ER-2026-0143
Metro Normalized and Annualized Billing Determinants

Medium General Service

MGAE

	Summer kWh	Winter kWh
Customer Charge		
0-24 kW	-	-
25-199 kW	769.88	1,526.99
200-999 kW	187.60	388.07
1000 kW or above	11.44	22.81
Energy		
First 180	16,662,256.02	39,661,569.35
Next 180	12,155,863.09	26,594,162.81
Over 360	3,402,072.63	7,209,207.28
Facilites		
Per kW of facilites demand per	150,633.59	302,553.03
Demand Charge		
Per KW of billing demand per	95,338.72	229,249.48
Reactive demand adj	5,403.55	4,471.73
Total	32,220,191.75	73,464,939.44

MGAF

	Summer kWh	Winter kWh
Customer Charge		
0-24 kW	-	-
25-199 kW	-	-
200-999 kW	-	-
1000 kW or above	4.00	8.00
Summer Energy		
First 180	3,950,949.86	6,463,534.32
Next 180	2,289,592.61	4,662,430.27
Over 360	1,023,751.56	1,333,716.52
Facilites		
Per kW of facilites demand per	44,074.80	73,333.84
Demand Charge		
Per KW of billing demand per	22,264.38	36,273.19
Reactive demand adj	790.02	411.41
Total	7,264,294.02	12,459,681.10

Large General Service

LGSE

	Summer kWh	Winter kWh
Customer Charge		
0-24 kW	-	-
25-199 kW	-	-
200-999 kW	2,474.06	4,945.47
1000 kW or above	180.74	364.13
Energy		
First 180	183,322,064.75	330,873,126.52
Next 180	151,481,712.79	262,552,552.30
Over 360	96,316,591.69	153,811,060.26
Facilites	-	-
Per kW of facilites demand per	1,285,394.61	2,561,366.95
Demand Charge		
Per KW of billing demand per	1,109,147.71	2,065,163.40
Reactive demand adj	65,684.71	102,171.76
Parallel	(19,845.79)	(28,804.05)
Total kwh	431,120,369.23	747,236,739.08

CASE NO. ER-2026-0143
Metro Normalized and Annualized Billing Determinants

Large General Service

LGSF

	Summer kWh	Winter kWh
Customer Charge		
0-24 kW	-	-
25-199 kW	-	-
200-999 kW	199.40	404.73
1000 kW or above	152.60	299.27
Energy		
First 180	67,738,100.60	116,598,067.32
Next 180	60,853,246.15	106,557,172.35
Over 360	34,720,445.15	63,414,428.38
Facilites		
Per kW of facilites demand per	463,735.92	924,577.98
Demand Charge		
Per KW of billing demand per	390,603.25	672,307.60
Reactive demand adj	32,662.91	47,909.44
	-	-
Total kwh	163,311,791.89	286,569,668.05

LGAE

	Summer kWh	Winter kWh
Customer Charge		
0-24 kW	-	-
25-199 kW	-	-
200-999 kW	305.81	612.46
1000 kW or above	112.59	224.34
Energy	-	-
First 180	42,135,544.00	99,656,278.24
Next 180	38,847,070.20	88,672,098.09
Over 360	30,125,556.47	60,499,715.14
Facilites	-	-
Per kW of facilites demand per	361,105.52	729,445.21
Demand Charge	-	-
Per KW of billing demand per	242,325.83	567,651.16
Reactive demand adj	9,195.71	6,408.06
Total kWh	111,108,170.67	248,828,091.47

LGAF

	Summer kWh	Winter kWh
Customer Charge		
0-24 kW	-	-
25-199 kW	-	-
200-999 kW	16.00	33.86
1000 kW or above	20.00	38.14
Energy		
First 180	10,970,411.35	23,974,561.43
Next 180	10,613,532.93	22,500,689.05
Over 360	9,645,070.52	17,380,755.00
Facilites	-	-
Per kW of facilites demand per	86,530.53	168,060.18
Demand Charge		
Per KW of billing demand per	61,326.69	133,423.38
Reactive demand adj	3,303.32	2,651.92
Total kWh	31,229,014.81	63,856,005.48

CASE NO. ER-2026-0143
Metro Normalized and Annualized Billing Determinants

Large General Service

LFSFP

	Summer kWh	Winter kWh
Customer Charge		
0-24 kW	-	-
25-199 kW	-	-
200-999 kW	4.00	8.00
1000 kW or above	-	-
Energy		
First 180	427,681.52	844,819.44
Next 180	427,477.86	840,409.75
Over 360	454,960.59	612,182.56
Facilites		
Per kW of facilites demand per	2,592.96	5,224.80
Demand Charge	-	-
Per KW of billing demand per	2,389.32	4,716.60
Reactive demand adj	117.54	186.24
Total kWh	1,310,119.96	2,297,411.75

Clean Charge

EVC

	Summer kWh	Winter kWh
Bill count	1,632.00	3,264.00
kWh	659,761.96	1,420,794.27

BEV

	Summer kWh	Winter kWh
Customer Charge	34.53	69.07
Facilities charge	5,009.41	9,560.63
Summer Energy		
on-peak	69,104.01	10,311.16
off-peak	173,072.07	33,805.08
super off-peak	-	-
Winter Energy		
on-peak	10,429.73	173,581.77
off-peak	26,008.35	433,516.65
super off-peak	40,523.96	76,667.78
Total	319,138.11	727,882.43

ETS

	Summer kWh	Winter kWh
Customer Charge	4.00	8.00
Facilities charge	984.21	1,990.41
Summer Energy	-	-
on-peak	20,582.89	14,749.30
off-peak	46,754.31	46,481.29
super off-peak	-	-
Winter Energy	-	-
on-peak	6,972.98	72,527.55
off-peak	14,485.88	149,211.37
super off-peak	-	-
Total	88,796.06	282,969.51