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Service Commission

Exhibit No. 154

Staff – Exhibit 154
Surrebuttal 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:	*Surrebuttal Testimony*
Case No.:	*ER-2026-0143*
Date Testimony Prepared:	*September 10, 2026*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

SURREBUTTAL TESTIMONY

OF

STACY HENDERSON

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

CASE NO. ER-2026-0143

Jefferson City, Missouri
September 2026

SURREBUTTAL 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, and I also filed rebuttal testimony on August 11, 2026.

Q. What is the purpose of your surrebuttal testimony?

A. The purpose of my surrebuttal testimony is to respond to Evergy Missouri Metro ("EMM") witness, Linda J. Nunn, in regard to changing the fuel cost definition. I will also respond to the Office of the Public Counsel ("OPC") witness Angela Schaben in regard to her response to Ms. Nunn's recommendation to include Southwest Power Pool ("SPP") administrative fees in the FAC.

CHANGE TO FUEL COST DEFINITION

Q. EMM witness Ms. Nunn explains that EMM's tariff already limits recovery under subaccount 501400 "Fuel Expense Residuals" to costs and revenues associated with combustion byproducts, slag, and ash disposal. Is this similar to staff's recommendation in direct?

A. Yes. In my direct testimony, Staff recommended changing some minor wording in the definition of fuel cost, specifically for account 501400.[1] The current wording "other miscellaneous expenses" is too vague and not specifically related to fuel residuals. Staff recommended removing these words from the definition and using specific fuel residual terms, if necessary. In response to Ms. Nunn, instead of removing the words "other miscellaneous expenses" Staff would be comfortable with "other miscellaneous expenses associated with combustion byproducts, slag, and ash disposal" as long as it is made clear not all miscellaneous expenses will be included.

Q. Ms. Nunn recognizes Staff has every opportunity to examine costs included in the FAC's prudence reviews and provide their analysis at that time. How do you respond?

A. Staff found in Case No. EO-2023-0073 there were expenses associated with contractor per diems including meals and mileage. Staff's opinion is that these costs are not eligible for FAC recovery. Staff does not agree that contract labor costs should go beyond the physical labor of disposing of by products, slag and ash disposal. At the time of that prudence review, Staff did not recommend a disallowance because the wording

[1] Direct Testimony of Stacy Henderson, page 8, line 24 through page 9, line 2.

was too vague, but Staff did note in its Staff Report that Staff would recommend changing the wording in its next general rate case. Therefore, Staff recommends the tariff should only read "other miscellaneous expenses associated with combustion byproducts, slag, and ash disposal" to avoid any future confusion.

SPP ADMINISTRATIVE COSTS

Q. EMM's witness, Ms. Nunn, states the SPP administrative charges should be included in the FAC,[2] does Staff agree with this proposal?

A. No.

Q. OPC's witness, Ms. Schaben, argues that SPP administrative charges should not be included in the FAC,[3] does Staff agree?

A. Yes, as Ms. Schaben stated the Commission has already denied these costs in the FAC and should continue to do so as they are not needed for EMM to purchase or sell energy and were deemed unlawful in the Commission Report and Order in Case No. ER-2014-0370.[4]

Q. What is Staff's position on including the SPP administrative charges?

A. As stated in my rebuttal,[5] Staff recommends excluding the administrative charges in the FAC. These charges do not significantly fluctuate with fuel and purchased power costs.[6] Instead, they are administrative costs, and are already either annualized

[2] EMM witness, Linda J. Nunn's Rebuttal Testimony, Page 21, lines 13 through 15.
[3] OPC's witness, Angela Schaben's Rebuttal Testimony, Page 2, lines 1 through 25.
[4] *See* the Report and Order in Case No. ER-2014-0370, EFIS Item No. 592.
[5] Page 2, lines 6 through 11.
[6] In Case No. ER-2014-0370, the Commission referred to the following criteria for FAC inclusion:
1. They represent a significant portion of the utility's costs;

or normalized in base rates and do not fluctuate greatly between rate cases. This also keeps consistency through prior Commission orders and across the utilities as stated in OPC's witness, Angela Schaben's rebuttal[7].

Q. Does this conclude your surrebuttal testimony?

A. Yes it does.

2. They fluctuate significantly; and
3. The costs are outside of the utility's control.

[7] OPC's witness, Angela Schaben's Rebuttal Testimony, page 2, lines 5 through 20.

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 *Surrebuttal / True-Up Direct 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 9th 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

Notary Public