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Exhibit No. 157

Staff – Exhibit 157
True-Up Surrebuttal Direct Testimony of Brodrick Niemeier
Case No. ER-2026-0143

Exhibit No.:	
Issue(s):	*Fuel & Purchased Power*
Witness:	*Brodrick Niemeier*
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

ENGINEERING ANALYSIS DEPARTMENT

SURREBUTTAL / TRUE-UP DIRECT TESTIMONY

OF

BRODRICK NIEMEIER

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

CASE NO. ER-2026-0143

Jefferson City, Missouri
September 2026

** Denotes Confidential Information **

SURREBUTTAL / TRUE-UP DIRECT TESTIMONY

OF

BRODRICK NIEMEIER

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 Brodrick Niemeier and my business address is Missouri Public Service Commission, P.O. Box 360, Jefferson City Missouri 65102.

Q. Are you the same Brodrick Niemeier who filed direct testimony within this case?

A. Yes, I am.

EXECUTIVE SUMMARY

Q. What is the purpose of your surrebuttal / true-up direct testimony?

A. The purpose of my surrebuttal testimony is to respond to Evergy Missouri Metro ("EMM") witness Hsin Foo concerning Missouri Public Service Commission Staff's ("Staff") production cost modeling. The purpose of my true-up direct testimony is to update the Staff's calculation of the variable fuel and purchased power expense.

Q. Do you provide any recommendations for expense levels to be reflected in the revenue requirement ordered in this case?

A. Yes. It is my recommendation that the revenue requirement ordered by the Commission in this case should reflect Staff's calculation of variable fuel and purchased power expense, equal to $268,858,956.

Q. Do you describe the development of a work product you provided to another Staff witness for the development of an issue?

A. Yes. I provided the production cost model results to Staff witness Brooke Mastrogiannis for use in determining the appropriate percentage of transmission expense for EMM to recover, as well as to develop Staff's recommended Fuel Adjustment Clause Base Factor. I also provided the production cost model results to Staff witness Antonija Nieto to include in the calculation of Staff's fuel expense levels, which are then included in Staff's recommended revenue requirement.

SURREBUTTAL

Q. Can you summarize EMM's critique of Staff's production cost model concerning nuclear generation on pages 12 and 13 of EMM witness Foo's Rebuttal Testimony?

A. Yes. EMM witness Foo stated that typically, Wolf Creek will operate at or near full output when there is not a refueling outage or other operational limitation. Foo goes on to state "Staff's model dispatches Wolf Creek as though it regularly increases and decreases output in response to changing market conditions."[1] Finally, Foo states that Wolf Creek ramping up and down can affect other units within the model as well as market purchases.

Q. Do you agree with Foo's critique?

[1] From Page 12 line 23 and Page 13 line 1 of Foo's Rebuttal testimony.

A. Yes, in part. Wolf Creek does operate near its full capacity the majority of the time, though it does experience derates.[2] ** [redacted] . ** While it is not a common occurrence within historical data, Wolf Creek does occasionally operate at a significantly reduced capacity, which is why Staff's production cost model included a minimum capacity significantly lower than what Wolf Creek normally operates at Staff's production cost model results were based upon the information at the time of direct. Staff has since updated its production cost model for true-up, which includes increasing Wolf Creek's minimum capacity to better reflect how EMM operated the unit, including the most recent historical period.

Q. Can you summarize EMM's critique of Staff's production cost model concerning coal generation on pages 13-15 of Foo's Rebuttal Testimony?

A. Yes. Foo's critique mostly centered around coal units within Staff's production cost model generating less than a five-year historic average.

Q. Did coal generation within Staff's production cost model generate less than the respective five-year historical averages?

A. Yes. Compared to a five-year average, Staff's coal generation was significantly lower. However, when compared to a four-year average, coal generation

[2] Derates are events where a unit's ability to generate is limited, but the unit is not in outage. This could be due to a mechanical issue with the unit, fuel supply issues, a transmission line issue, or a number of other causes.

within Staff's model is much closer to the historical average. From Confidential Table HYF-1 of Foo's testimony, ** [redacted] . **

Q. How does EMM's production cost model compare to the respective historical 5-year averages?

A. Each coal generator within EMM's model is at least 10% different from the five-year average that EMM presented on page 14 of Foo's rebuttal testimony. Confidential Table BAN-X shows EMM's production cost model results[3] compared to a five-year average from 2021-2025[4].

** [redacted]

[redacted]

[3] EMM's production model results are from Foo's direct workpaper labeled "CONFIDENTIAL_KCPL_Direct_Hourly_Model.xlsx"

[4] Ms. Foo's rebuttal testimony, page 14.

[redacted]

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When Staff compares the EMM modeled units to that unit's actual generation level from 2015 – 2025, for LaCygne 2 and Hawthorn 5, there is one year where the actual annual generation is at or higher than what EMM is modeling. For Iatan 2, there was one year in the last five years where the actual generation was at or above the annual modeled generation in EMM's production cost modeling used for its direct testimony. When reviewing Iatan 1 and LaCygne 1, for one out of the last five years the actual generation was at or below the level EMM modeled, as these units noticeably under-generated compared to the five-year average.

Q. Why was Greenwood Solar included in Staff's production cost model when Foo states on page 15 lines 10-12 that it should not be included?

A. During the Greenwood CCN case,[5] the Commission was concerned about Evergy Missouri West ("EMW") customers bearing the entire cost of a project that would also give EMM experience operating solar facilities. Within its Report and Order, the Commission asked EMW to propose a means to split the costs with EMM customers when EMW sought to add Greenwood Solar into rate base.[6] Because of this, Staff has allocated Greenwood solar to both EMM and EMW in each rate case since. Staff witness Matthew Young discusses this topic further on page 4 of his direct testimony.

[5] Commission File No. EA-2015-0256.
[6] Pages 16 and 17 of the Commission's Report and Order within case EA-2015-0256.

TRUE-UP

Q. What inputs to the production cost model have been updated?

A. Staff has updated outages, renewable generation, load, market prices and fuel prices to reflect data through June 30, 2026.

Q. What does Staff recommend for the fuel and purchased power cost in this case?

A. Staff recommends a Fuel and Purchased Power Cost of $268,858,956.

Q. Does this conclude your surrebuttal / true-up 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 BRODRICK NIEMEIER

STATE OF MISSOURI	)	
	)	ss.
COUNTY OF COLE	)	

COMES NOW BRODRICK NIEMEIER and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Surrebuttal / True-Up Direct Testimony of Brodrick Niemeier*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

Brodrick Niemeier

BRODRICK NIEMEIER

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 3rd 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