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Service Commission

Exhibit No. 173

Staff – Exhibit 173
True-Up Rebuttal Testimony of Amanda Rucker
Case No. ER-2026-0143

Exhibit No.:
Issue(s): *Large Power Revenue*
Witness: *Amanda Rucker*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *True-Up Rebuttal Testimony*
Case No.: *ER-2026-0143*
Date Testimony Prepared: *September 23, 2026*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

TRUE-UP REBUTTAL TESTIMONY

OF

AMANDA RUCKER

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

CASE NO. ER-2026-0143

Jefferson City, Missouri
September 2026

*** Denotes Highly Confidential Information ***

TRUE-UP REBUTTAL TESTIMONY

OF

AMANDA RUCKER

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 Amanda Rucker, and my business address is 200 Madison Street, Jefferson City, Missouri 65101.

Q. Are you the same Amanda Rucker who filed direct and true-up direct testimony in this case?

A. Yes.

Q. What is the purpose of your true-up rebuttal testimony?

A. The purpose of my true-up rebuttal is to respond to how Evergy Missouri Metro ("EMM") witness Graham Jaynes determined the retail rate revenues for Customer B in true-up direct.

RETAIL RATE REVENUES OF CUSTOMER B

Q. How did Mr. Jaynes determine Customer B retail rate revenues in true-up direct?

A. Based on his true-up direct testimony, Mr. Jaynes states "For Customer B, normalization included adjusting to 12 months ending June 2026 activity."[1] This is

[1] Graham Jaynes Surrebuttal & True-up Direct Testimony, Page 27 line 6.

represented in his workpaper by using the billing determinants as reported for Customer B during the time frame of July 2025 to June 2026. This includes billing determinants for the revenue months of *** [redacted] *** for which Customer B was under the Large General Service ("LGS") rate class.

Q. How does the approach to Customer B's billing determinants differ between EMM and Staff?

A. EMM normalized the billing determinants for Customer B, but did not annualize the billing determinants for Customer B where Staff's analysis includes an annualization for Customer B.[2]

Q. What is the difference between normalization and annualization?

A. Normalizations are adjustments to billing determinants that account for unusual and unlikely events that would not be repeated in years when the new rates from this case are in effect, and annualizations are adjustments to billing determinants to reflect known conditions at the end of the period evaluated.[3]

Q. Why is it important to annualize Customer B to determine the retail rate revenues?

A. The annualization process accounts for the growth of Customer B from the LGS rate class to the Large Power Service ("LPS") rate class during the time frame evaluated. By using billing determinants that were provided for Customer B during the last several months of the true-up period to annualize billing determinants that occurred

[2] Comparison charts are provided in schedule AR-tr1.
[3] Kim Cox Direct Testimony Page 4, lines 4 through 11.

in the earlier months, Staff's annualization accounts for a year's worth of information to be reflected closer to the known conditions at the end of the true-up period.[4]

Q. What is Staff's response to Mr. Jaynes' statement that "Customer B is a LPS customer without observable LLPS behavior and commitments"?[5]

A. Staff does not dispute that Customer B is appropriately reflected as an LPS customer, Mr. Jaynes understates the billing determinants of Customer B as an LPS customer by choosing not to annualize Customer B.

Q. Does this conclude your true-up rebuttal testimony?

A. Yes it does.

[4] True-up period reflects data ending on June 30th, 2026.
[5] Graham Jaynes Surrebuttal & True-up Direct Testimony, Page 27 line 7-8.

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 AMANDA RUCKER

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW AMANDA RUCKER and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *True-Up Rebuttal Testimony of Amanda Rucker*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

AMANDA 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 17th 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

Case No. ER-2026-0143

INFORMATION CONTAINED IN

SCHEDULE AR-tr1

IS DEEMED HIGHLY CONFIDENTIAL

IN ITS ENTIRETY