FILED
November 9, 2026
Missouri Public
Service Commission

# Exhibit No. 218

OPC – Exhibit 218
Rebuttal Testimony of Angela Schaben
Case No. ER-2026-0143

| | |
|---|---|
| **Exhibit No.:** | |
| **Issue(s):** | FAC |
| **Witness/Type of Exhibit**: | Schaben/Rebuttal |
| **Sponsoring Party**: | Public Counsel |
| **Case No**.: | ER-2026-0143 |

# REBUTTAL TESTIMONY

# OF

# ANGELA SCHABEN

Submitted on Behalf of the Office of the Public Counsel

# EVERGY METRO, INC. D/B/A EVERGY MISSOURI METRO

CASE NO. ER-2026-0143

August 11, 2026

## TABLE OF CONTENTS


| Testimony | Page |
|---|---|
| Introduction | 1 |
| FAC Tariff and Administrative Charges | 2 |
| FAC Reporting | 4 |

**REBUTTAL TESTIMONY**

**OF**

**ANGELA SCHABEN**

**EVERGY MISSOURI METRO, INC.**
**D/B/A EVERGY MISSOURI METRO**

**CASE NO. ER-2026-0143**

## INTRODUCTION

**Q. Please state your name, title, and business address.**

A. Angela Schaben, Senior Utility Regulatory Auditor, Office of the Public Counsel ("OPC" or "Public Counsel"), P.O. Box 2230, Jefferson City, Missouri 65102.

**Q. Are you the same Angela Schaben who filed direct testimony for the OPC in this case?**

A. Yes.

**Q. What is the purpose of your testimony?**

A. I am responding to Evergy Metro, Inc. ("Evergy Metro") Witness Linda Nunn regarding administrative fees that flow through Evergy Metro's Fuel Adjustment Clause ("FAC") and updated tariff sheets. Additionally, I am responding to Staff Witness Stacey Henderson regarding Staff's position on Evergy Metro's FAC monthly reporting requirements.

**Q. Would you summarize your recommendations to the Commission?**

A. I recommend not allowing the 447016 account, the 555006 account, or administration fee charge types to be added to the FAC tariff as proposed by Company witness Linda Nunn.

**FAC Tariff and Administrative Charges**

**Q. Ms. Nunn, within the tariff sheets provided in her direct testimony, is proposing to include in Evergy's FAC, SPP charge types applicable to administrative fees.[1] Should the Commission allow Evergy Metro's FAC to be changed to include these costs?**

A. No. Evergy has requested administrative costs be included in its FAC in prior general rate cases. The Commission specifically addressed Evergy's request to include SPP administrative costs in its *Report and Order* in Case No. ER-2014-0370 where it made the following conclusion:

> KCPL has requested that SPP Schedule 1-A and 12 fees be included in its FAC. The Commission finds that these fees are administrative in nature and not directly linked to fuel and purchased power costs. These fees support the operation of SPP and are not needed for KCPL to buy and sell energy to meet the needs of its customers. These fees are neither fuel and purchased power expenses nor transportation expenses incurred to deliver fuel or purchased power. The Commission concludes that including such fees would be unlawful under Section 386.266.1, RSMo, and, therefore, Schedule 1-A and 12 fees should not be included in the FAC. These fees are appropriate for recovery in base rates. (Emphasis added)

Ms. Nunn did not provide any information that would justify the Commission changing its position to include SPP administrative costs. The Commission should continue to deny including these costs in Evergy Metro's FAC.

**Q. The FAC rule specifies that, for each cost or revenue type, the Commission may consider the magnitude and volatility and utility incentive for including said costs or revenue types. Did Ms. Nunn's testimony provide a basis on the magnitude or volatile nature of the proposed administrative charge types?**

A. No. Ms. Nunn does not provide a basis for adding new administrative charge types to its FAC.

[1] Direct Testimony of Linda Nunn, file no. ER-2026-0143, Schedule LJN-5, page 41 of 44. The specific charge types in question are: Integrated Marketplace Administration Services, Integrated Marketplace Clearing Administration Service, Integrated Marketplace Facilitation Administration Service.

**Q. Did Ms. Nunn provide a basis for adding the 447016 and 555006 accounts for recording long-term capacity charges or revenues to Evergy's FAC tariff?**

A. Yes. Beginning on page 4, line 20 through page five, line 4, Ms. Nunn asserts that including "purchased power capacity costs or revenues for any contract length which would allow for the appropriate matching recovery/customer credits for the management of capacity needs/sales between rate cases. The proposed changes would also allow EMM to include long-term capacity sales and purchases in the FAC going forward, given the capacity market in SPP continues to tighten and resource adequacy requirements are becoming much more fluid between rate cases as long-term capacity contracts become more prevalent."

**Q. Did Ms. Nunn provide a basis on the magnitude or volatile nature of the purchased power capacity costs or revenues Evergy seeks to recover through its FAC?**

A. No, not that I found.

**Q. Does an anticipated tightening of the capacity market or the fluidity of resource adequacy requirements justify flowing these costs through a cost tracker such as a FAC?**

A. No. These types of historical costs would generally be included in the revenue requirement when setting rates, therefore a cost tracker would be unnecessary. If these anticipated costs are not known and measurable, and fall outside of the true up period, then this should not be an issue in the current rate case.

**Q. What do you recommend?**

A. I recommend not adding the Company's proposed administrative charge types to its FAC, as indicated in the revised tariff sheets attached to my testimony. I also recommend not allowing costs and revenues recorded in the 447016 and 555006 accounts to flow through Evergy Metro's FAC, and that the Commission adopt the FAC tariff sheet attached to my testimony as Schedule ADS-R-1.

**FAC Reporting**

**Q. Did Staff Witness Stacy Henderson propose FAC reporting requirements?**

A. Yes, on pages nine through ten of her direct testimony.

**Q. Do you have anything to add to Ms. Henderson's proposed FAC reporting requirements for Evergy?**

A. Yes. I recommend that Evergy provide the requested reports to both Staff and OPC.

**Q. Does this conclude your testimony?**

A. Yes.

**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 ANGELA SCHABEN**

**STATE OF MISSOURI** )
) **ss**
**COUNTY OF COLE** )

Angela Schaben, of lawful age and being first duly sworn, deposes and states:

1. My name is Angela Schaben. I am a Senior Utility Regulatory Auditor for the Office of the Public Counsel.

2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony.

3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

Angela Schaben
Senior Utility Regulatory Auditor

Subscribed and sworn to me this 10th day of August 2026.

TIFFANY HILDEBRAND
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES AUGUST 8, 2027
COLE COUNTY
COMMISSION #15637121

Tiffany Hildebrand
Notary Public

My Commission expires August 8, 2027.