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Service Commission

Exhibit No. 304

MECG – Exhibit 304
Surrebuttal Testimony of Greg Meyer
Case No. ER-2026-0143

Exhibit No.:	304
Issues:	Jurisdictional Allocation and LLPS Revenues
Witness:	Greg R. Meyer
Type of Exhibit:	Surrebuttal Testimony
Sponsoring Party:	Midwest Energy Consumers Group
Case No.:	ER-2026-0143
Date Testimony Prepared:	September 10, 2026

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**

Surrebuttal Testimony of

Greg R. Meyer

On behalf of

Midwest Energy Consumers Group

September 10, 2026

BRUBAKER & ASSOCIATES, INC.

Project 12018

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**

STATE OF MISSOURI)
) **SS**
COUNTY OF ST. LOUIS)

Affidavit of Greg R. Meyer

Greg R. Meyer, being first duly sworn, on his oath states:

1. My name is Greg R. Meyer. I am a consultant with Brubaker & Associates, Inc., having its principal place of business at 16690 Swingley Ridge Road, Suite 140, Chesterfield, Missouri 63017. We have been retained by Midwest Energy Consumers Group in this proceeding on their behalf.

2. Attached hereto and made a part hereof for all purposes is my surrebuttal testimony which was prepared in written form for introduction into evidence in Missouri Public Service Commission Case No. ER-2026-0143.

3. I hereby swear and affirm that the testimony is true and correct and that it shows the matters and things that it purports to show.

Greg R Meyer
Greg R. Meyer

Subscribed and sworn to before me this 10th day of September, 2026.

ADRIENNE J. FOLLETT
Notary Public - Notary Seal
STATE OF MISSOURI
Jefferson County
My Commission Expires: Mar. 22, 2029
Commission # 21989987

Adrienne J Follett
Notary Public

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Surrebuttal Testimony of Greg R. Meyer

I. INTRODUCTION

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A Greg R. Meyer. My business address is 16690 Swingley Ridge Road, Suite 140, Chesterfield, MO 63017.

Q ARE YOU THE SAME GREG R. MEYER WHO PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

A Yes. I previously filed Direct Testimony on June 30, 2026 in this proceeding.

Q ARE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE OUTLINED IN YOUR PRIOR TESTIMONY?

A Yes. This information is included in Appendix A to my Direct Testimony filed on June 30, 2026.

Q ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?

A I am appearing on behalf of Midwest Energy Consumers Group ("MECG"). MECG represents the interests of large commercial and industrial customers taking service

from Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("Evergy Metro" or "Company") primarily on its Large General Service ("LGS") and Large Power Service ("LPS") rate schedules. These customers are energy-intensive, compete in regional and national markets, and are very sensitive to electric rate levels and structures.

Q WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

A My Surrebuttal Testimony will address the use of a 4 Coincident Peak ("CP") jurisdictional allocator and my proposal to track large load customer revenues above a certain minimum level.

My silence with regard to any other position taken by the Company or any other party in this proceeding does not indicate my endorsement of that position.

II. RESPONSE TO COMPANY WITNESS WOLFRAM

Q HAVE YOU READ THE REBUTTAL TESTIMONY OF THE COMPANY'S WITNESS JOHN WOLFRAM THAT ADDRESSES YOUR POSITION WITH THE USE OF A 4 CP JURISDICTIONAL ALLOCATOR?

A Yes, I have.

Q PLEASE COMMENT ON MR. WOLFRAM'S REBUTTAL TESTIMONY.

A Mr. Wolfram did not dispute the analysis performed by the Missouri Public Service Commission ("Commission") Staff ("Staff") witness Alan Bax. Mr. Bax's analysis proves that the use of a 4 CP is a more appropriate jurisdictional allocator than a 12 CP for the Company. In fact on page 6 of his Rebuttal Testimony, Mr. Wolfram states the following:

As I stated in direct testimony, the FERC test results indicate that using a seasonal peak determination is more appropriate than using a 12 CP for determining the demand allocator, but that is not the same as saying that the 12 CP allocator is unreasonable or flawed.

In this case the seasonal peak allocator is a 4 CP allocator. From my perspective, Mr. Wolfram is admitting that a 4 CP allocator is more realistic of the Company's operations, but still proposes a jurisdictional allocator using the average of a 4 CP and 12 CP methodologies.

Q IN HIS REBUTTAL TESTIMONY, MR. WOLFRAM DISCUSSES THE CONCEPT OF JURISDICTIONAL HARMONY. PLEASE DISCUSS THE CONCEPT OF JURISDICTIONAL HARMONY.

A Jurisdictional harmony in my opinion is an argument to protect the Company from any shortfall in recovery of jurisdictional investments. In this instance, Mr. Wolfram is asking this Commission to ignore cost causation principles and adopt a jurisdictional allocator that will unreasonably assign more costs to Missouri ratepayers. By doing so, the Company will have achieved jurisdictional harmony contrary to long-standing jurisdictional methodologies that support a 4 CP allocator and at a higher cost to Missouri ratepayers. In this time of heightened awareness of customer affordability, Evergy Metro's ratepayers should not have to pay more for jurisdictional harmony.

Q IN HIS DIRECT TESTIMONY, DID MR. WOLFRAM ACKNOWLEDGE THE 4 CP METHODOLOGY WAS MORE APPROPRIATE THAN A 12 CP METHODOLOGY?

A Yes, he did, and I included his remarks in my Direct Testimony.

Q WHAT IS THE SIGNIFICANCE OF THOSE FINDINGS?

A Mr. Wolfram admits that a 4 CP is a more appropriate jurisdictional allocator, but to achieve jurisdictional harmony is asking the Commission to partially ignore those results and use the 12 CP in conjunction with the 4 CP. In other words, viewed separately a 12 CP is not reasonable, but the Company argues that combining the 12 CP with a 4 CP should make everyone happy, even though certain customers will have to pay more. The fact remains that the proposal by the Company assigns more costs to Evergy Metro's ratepayers than a reasonable allocator (4 CP).

III. RESPONSE TO COMPANY WITNESS GUNN

Q DID YOU READ THE REBUTTAL TESTIMONY OF THE COMPANY'S WITNESS KEVIN D. GUNN DISCUSSING THE LARGE LOAD REVENUE OFFSET?

A Yes, I did.

Q DO YOU BELIEVE THE COMPANY HAS CHANGED ITS COMMITMENT REGARDING LARGE LOAD REVENUES? PLEASE EXPLAIN.

A Yes, I do. In his Rebuttal Testimony, Mr. Gunn now proposes that large load revenues should be subject to a tracker mechanism if the projected large load revenues do not reach the $25 million the Company indicated in its Direct Testimony would be achieved. Mr. Gunn's new recommendation is based on my argument that large load revenues in excess of a reasonable amount should be subject to deferral until the next rate case.

Q WHAT ARGUMENTS DID MR. GUNN OFFER FOR OPPOSING YOUR RECOMMENDATION?

A Mr. Gunn argues that by only proposing a one-way tracker, the Company is assuming all the risk associated with revenues not achieving the level that has been proposed.

Q DO YOU AGREE WITH MR. GUNN'S ARGUMENTS?

A Partially, I would agree that establishing a one-way tracker could be argued to shift some risk onto the utility. However, establishing a reasonable revenue level for tracking reduces the risk of not achieving the assumed revenues.

Q WHAT ARE THE DIFFERING LEVELS OF LARGE LOAD REVENUES PROPOSED BY CERTAIN PARTIES IN THIS RATE CASE?

A The Company originally proposed a large load revenue stream of $16.1 million. However, that level was adjusted before the Direct Testimony filing to approximately $25 million. In his Rebuttal Testimony, Mr. Gunn updated the large load revenue estimate to $43 million. Meanwhile, the Staff filed its Direct Testimony estimating a large load revenue estimate of approximately $51 million. Clearly the recent large load revenues estimates are significantly greater than the $25 million included in the Company's revenue deficiency calculation.

Q WHAT LEVEL OF LARGE LOAD REVENUES DO YOU PROPOSE TO BE INCLUDED IN THIS RATE CASE?

A I propose to include $25 million for the large load revenue offsets.

Q HOW DOES THAT LEVEL OF LARGE LOAD REVENUES ADDRESS MR. GUNN'S ARGUMENTS FOR A SYMMETRICAL REVENUE SHARING PROPOSAL?

A That level of large load revenues presents little risk that those revenues would not be recognized in any one year. Therefore, at that level ($25 million), I continue to support a one-way revenue tracker.

Q DID THE STAFF SUPPORT YOUR POSITION?

A Staff witness, Sarah Lange, found my position as more straightforward than the Earnings Sharing Mechanism ("ESM") proposal advanced by Google LLC's witness Dr. Carolyn A. Berry.[1]

Q WHY DO YOU BELIEVE YOUR PROPOSAL IS SUPERIOR TO AN ESM?

A I believe my proposal is superior to an ESM because my proposal focuses solely on the large load revenue issue and does not consider other factors of the Company's revenue requirement.

Q DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

A Yes, it does.

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[1] *See* Rebuttal Testimony of Sarah L.K. Lange at page 14, lines 21-22.