

Exhibit No.:
Issues: *Fuel and Purchased
Power Costs*
Witness: *Brad J. Fortson*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Rebuttal Testimony*
Case No.: *EF-2022-0155*
Date Testimony Prepared: *June 30, 2022*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

REBUTTAL TESTIMONY

OF

BRAD J. FORTSON

EVERGY MISSOURI WEST, INC.,

d/b/a EVERGY MISSOURI WEST

CASE NO. EF-2022-0155

Jefferson City, Missouri
June 2022

**** Denotes Confidential Information ****

1 disallowance of \$14,771,657.61 based on the decision of the Company to attempt 100%
2 recovery of fuel and purchased power costs in this case.

3 **PRUDENCE REVIEW OF EMW'S WINTER STORM URI FUEL AND PURCHASED**
4 **POWER COSTS**

5 Q. Please provide some background on this issue.

6 A. In the Fuel Adjustment Clause ("FAC") Fuel Adjustment Rate ("FAR") filing
7 for Accumulation Period ("AP") 28, Case No. ER-2022-0005,¹ covering the six-month period
8 of December 2020 through May 2021, EMW requested to defer \$297,316,445 of extraordinary
9 costs associated with the February 2021 cold weather event ("Winter Storm Uri").² In that case,
10 Company witness Lisa A. Starkebaum's direct testimony explained that Winter Storm Uri
11 caused extremely cold temperatures in mid-February that lasted for days, and recovery through
12 the FAR filing would result in a significant increase to an average residential customers' bill.³
13 In this proceeding, Company witness Darrin R. Ives further explained that the unreasonably
14 cold temperatures in February 2021 resulted in rolling electrical blackouts and extreme natural
15 gas price spikes in Missouri.⁴

16 EMW requested to defer the costs because they believed it was not in customers' best
17 interests to recover the extraordinary costs through the FAC mechanism. EMW further
18 explained that deferral treatment has been allowed for utilities for past situations where
19 extraordinary costs were incurred due to acts of nature such as ice storms and tornadoes, and

¹ Filed July 1, 2021.

² \$6,588,116 of fuel and purchased power costs, not deemed extraordinary, were approved to be passed through the FAC and charged to customers in Case No. ER-2022-0005. That amount included a true-up amount of \$570,233, interest of \$14,148, and a prudence adjustment of \$984,898.

³ Lisa A. Starkebaum's Direct Testimony pages 5 and 6, filed on July 1, 2021.

⁴ EF-2022-0155, Ives Direct Testimony, page 6, lines 16-18.

1 the extreme cold temperatures in mid-February that lasted for days is an example of such an
2 extreme weather event outside anyone's control.⁵

3 The requested deferral of extraordinary costs was EMW's effort to prevent charging
4 customers a substantial rate increase by deferring the extraordinary costs that would have been
5 included in the FAR filing for AP 28, and instead include them for consideration in another
6 type of application. Potential recovery of the deferred costs through a different means than
7 through an EMW FAR filing would allow the opportunity to "spread" recovery of the costs out
8 over a longer period than otherwise would be possible using the standard FAR methodology
9 and thus minimize rate impact. The Company removed these costs from the FAC and ultimately
10 sought recovery of them in this securitization case.

11 The requested deferral of costs was also pursuant to Commission Rule 20 CSR 4240-
12 20.090(8)(A)2.A.(XI), which directs that tariff sheet(s) filed to change fuel adjustment rates
13 include certain information, including, "For the period of historical costs which are being used
14 to propose the fuel adjustment rates... Extraordinary costs not to be passed through, if any, due
15 to such costs being an insured loss, or subject to reduction due to litigation or for any
16 other reason." EMW further stated that this wording requires a utility to identify extraordinary
17 costs not to be passed through the FAC which appears to indicate deferral treatment.⁶

18 EMW determined the extraordinary costs amount during AP28 by calculating a three
19 year average baseline for February costs, using actual February costs for fuel, purchased power,
20 emissions, transmission expense, and off-system sales revenues for the years 2018, 2019, and
21 2020. The February 2021 actual costs that exceeded the February three-year baseline average

⁵ Lisa A. Starkebaum's Direct Testimony page 6, filed on July 1, 2021.

⁶ Lisa A. Starkebaum's Direct Testimony page 6, filed on July 1, 2021.

1 was the amount initially proposed to be deferred and ultimately proposed to be financed through
2 the issuance of securitization bonds.

3 In its next FAC FAR filing for AP29, EMW requested to defer additional net credits
4 associated with Winter Storm Uri to this securitization case proceeding, in the amount of
5 (\$3,900,115). Based on its inclusion in EMW's proposed securitized costs, it appears that in a
6 subsequent FAC FAR filing, EMW will be deferring an additional amount of ** [REDACTED] **
7 extraordinary costs for December 2021, as further described below. The Company also
8 proposes an additional ** [REDACTED] ** in non-fuel O&M costs, and applies a jurisdictional
9 factor of 99.62%, explained further below. This brings the total deferred costs per EMW witness
10 Ronald A. Klote's Direct Testimony Schedule RAK-1 to ** [REDACTED] ** for fuel,
11 purchased power, transmission, and off-system sales. However, the Company's response to
12 Staff's Data Request Nos. 0001 and 0001.1 in this case reflects a total deferral of
13 ** [REDACTED] ** for fuel and purchased power costs. This updated amount includes
14 additional deferred extraordinary costs of ** [REDACTED] ** incurred in February 2022, and then
15 further reduced by the Company's proposed 99.62% jurisdictional factor. EMW explains the
16 ** [REDACTED] ** as Southwest Power Pool ("SPP") resettlements received in February 2022.
17 Staff assumes the additional SPP resettlements of ** [REDACTED] ** from December 2021 and
18 ** [REDACTED] ** from February 2022 will be reflected in the next FAC FAR filing for AP 30,
19 which will cover the period December 2021 through May 2022, expected to be filed around
20 July 1, 2022.

21 In total, EMW has requested in this securitization docket recovery of
22 ** [REDACTED] ** of deferred fuel and purchased power costs, which reflects 100% of the

1 Winter Storm Uri fuel and purchased power costs and does not reflect an exclusion of 5% that
2 is applied during FAC filings, as discussed further below.

3 Q. Can you describe the actual net energy cost (“ANEC”) and the components that
4 were included as part of the deferred fuel and purchased power costs to be securitized?

5 A. EMW’s FAC ANEC includes four components of costs: fuel costs, net emission
6 costs, costs of purchased power and transmission; and two components of revenue: off-system
7 sales revenues, and renewable energy credit (“REC”) revenues. Although Staff reviewed all
8 components of the ANEC during this proceeding, the three major components that impacted
9 the Winter Storm Uri net costs were fuel, purchased power, and off-system sales.

10 Fuel costs are tracked in the Uniform System of Accounts (“USOA”) accounts 501
11 and 547. USOA account 501 reflects fuel used in the production of steam for the generation of
12 electricity, which are comprised of coal and natural gas generation units, and also fuel oil; and
13 account 547, the natural gas generation facilities, which are used as peaking units and generally
14 used when demand for electricity increases to a point baseload units cannot meet the demand.

15 Purchased power costs are tracked in USOA Account 555. USOA account 555 reflects
16 purchased power costs for long-term purchased power agreements (“PPAs”), and purchased
17 power costs for purchases of energy from the Southwest Power Pool (“SPP”) market to serve
18 native load.

19 Off-System Sales Revenues (“OSSR”) are tracked in USOA Account 447. USOA
20 account 447 reflects revenues from EMW’s sales of energy from its generation resources into
21 the SPP market.

22 Q. Please describe the work conducted by the Energy Resources Department Staff
23 regarding EMW’s application in this case.

1 A. Staff analyzed, reviewed, and was able to reconcile the ANEC based on the
2 transactions in the FERC accounts related to the calculation of the ANEC from three different
3 sources: the general ledger, the monthly reports, and the FAR work papers provided by EMW.
4 Within the fuel accounts, Staff reviewed the coal purchase contract terms, rail transportation
5 contract terms, and the energy risk management policy. Staff also reviewed a sample of fuel
6 invoices for the month of February 2021, including invoices supporting purchases of coal, oil,
7 natural gas, and freight. Within the purchased power costs, Staff reviewed the long-term PPA
8 contracts, the gains and losses from those contracts, and other SPP related costs.

9 In addition to this review, Staff reviewed additional information during the course of
10 this proceeding, for Winter Storm Uri and the February 2021 net costs. This review included
11 SPP related disputes, fuel inventory shortages, recommendations for Company improvements,
12 and the findings identified in the Cold Weather Event Interim Report referenced in response to
13 Data Request No. 0046. Staff was also able to analyze, review, and reconcile all SPP
14 resettlements to the amounts actually received in the FAR work papers provided. Staff also
15 reviewed the Company's fuel procurement activities during Winter Storm Uri.

16 Q. Are there individual Staff witnesses that worked on each part of this review?

17 A. Yes. Staff expert Brooke Mastrogiannis reviewed the purchased power costs,
18 Mark Kiesling reviewed the off-system sales, revenues, and Lisa Wildhaber reviewed the fuel
19 costs. Brooke Mastrogiannis and Lisa Wildhaber collectively reviewed the additional items
20 noted above such as the inventory issues, SPP disputed claims and resettlements received,
21 and the Cold Weather Event Interim Report. Staff expert Jordan T. Hull reviewed the
22 generation units, performance of units, generation-related issues, and the Cold Weather Event
23 Interim Report.

1 Q. Are you proposing any disallowances related to the Company's proposed
2 securitized fuel and purchased power costs?

3 A. Yes. I am proposing a disallowance of \$14,771,657.61, which is 5% of the
4 Company's proposed securitized fuel and purchased power costs, after reduction by the
5 applicable jurisdictional factors, based on the Company's decision to seek 100% recovery of
6 fuel and purchased power costs in this case.

7 Q. Is the proposed disallowance based on imprudent fuel and purchased power
8 costs?

9 A. No. Staff's review of the Company's fuel and purchased power costs did not
10 result in a proposed disallowance of any of those specific costs. However, the Company's
11 decision to propose 100% recovery of its fuel and purchased power costs in this securitization
12 case is inappropriate. Staff's proposed disallowance allows for fuel and purchased power
13 costs in this securitization case to be shared at the same 95/5 level as they would be had these
14 same costs been passed through to customers in the FAC, as fuel and purchased power costs
15 typically are.

16 Q. Please explain Staff's proposed disallowance of \$14,771,657.61, and the
17 95%/5% sharing mechanism of the FAC.

18 A. The FAC requires EMW to accumulate its actual net energy costs over a six
19 month accumulation period, followed by a twelve month recovery period during which the
20 amount of Actual Net Energy Costs over the Net Base Energy Costs is reduced by a
21 jurisdictional factor, and then 95% of that difference, combined with an interest calculation and
22 true-up adjustment, is either returned to or collected from customers. This mechanism allows
23 the Company to retain 5% of any over-collected amounts or requires the Company to absorb

1 5% of any under-collected amounts for each accumulation period. EMW's computations reflect
2 \$296,638,919 in total deferred fuel and purchased power costs (excluding EMW's proposed
3 ** [REDACTED] ** in non-fuel O&M costs). The jurisdictional factors applied to that total deferral
4 results in \$295,433,152, and 5% of that reduced amount is Staff's proposed disallowance of
5 \$14,771,657.61.

6 Q. Did Staff include the ** [REDACTED] ** in non-fuel O&M costs that EMW
7 proposes to include?

8 A. No. This is further addressed in Staff witness Kimberly K. Bolin's rebuttal
9 testimony.

10 Q. Please explain the jurisdictional factor as applied in FAR filings in general.

11 A. EMW's tariff⁷ defines this jurisdictional factor as: Missouri Retail Energy
12 Ratio=Retail kWh sales/total system kWh, where total system kWh equals retail and full and
13 partial requirement sales associated with GMO.⁸ This retail jurisdictional factor is computed
14 for every FAR filing and reduces the amount of Actual Net Energy Costs over the Net Base
15 Energy Cost. After applying the jurisdictional factor, 95% is then applied to the result and
16 ultimately passes through the FAC as either an under-recovery or over-recovery for the
17 accumulation period. EMW computes a jurisdictional factor for each FAR filing, based on an
18 average of the six months in each accumulation period.

19 Q. Please explain how the jurisdictional factor was applied to Staff's proposed
20 disallowance.

⁷ P.S.C. MO. No. 1 Original Sheet No. 127.21.

⁸ EMW was formerly known as KCP&L Greater Missouri Operations Company ("GMO").

1 A. For the original deferred amount of \$297,316,443.79 and subsequent
2 (\$3,900,115.13) resettlement adjustment, Staff used the jurisdictional factors reflected on the
3 applicable FAR filings⁹ that were in effect for those time periods.¹⁰ The extraordinary cost
4 adjustments for December 2021 and February 2022 will be reflected in the FAR to be filed
5 around July 1, 2022, so the applicable jurisdictional factor is not yet known for these months.
6 For purposes of the December 2021 and February 2022 adjustments, Staff applied the
7 jurisdictional factor of 99.62% as reflected in Mr. Klote's Schedule RAK-1 and RAK-2, which
8 Mr. Klote explains as the allocator resulting from EMW's last rate case. Staff intends to adjust
9 its proposed disallowance in surrebuttal testimony, after the appropriate jurisdictional factor is
10 known and provided in the Company's July 1st FAR filing.

11 Q. Is applying a single jurisdictional factor to the overall extraordinary cost amount
12 as Mr. Klote did appropriate?

13 A. No. As mentioned above, the jurisdictional factor is updated for every AP and
14 reflected in each FAR filing. The original deferred amount of \$297,316,443.79 was during
15 AP 28, the resettlement amount of (\$3,900,115.13) was during AP 29, and the December 2021
16 and February 2022 resettlement amounts were during AP 30, all of which have different
17 jurisdictional factors for their respective time periods. Using the jurisdictional factor from
18 EMW's last rate case, which precedes all of the above mentioned AP's, as Mr. Klote did, does
19 not provide for the updated, and effective, jurisdictional factors to be applied to each respective
20 time period. The Company should apply the applicable jurisdictional factors to the original
21 deferred amount and each subsequent resettlement as Staff did.

⁹ P.S.C. MO. No. 1,5th and 6th Revised Sheet Nos. 127.23, line 4.

¹⁰ The \$297,316,443.79 deferral related to AP 28 and a jurisdictional factor of 99.595363%. The (\$3,900,115.13) adjustment related to AP 29 and a jurisdictional factor of 99.75558%.

1 Q. Please explain how long the 95%/5% sharing mechanism has been in place
2 for EMW.

3 A. The Missouri Public Service Commission first authorized a FAC for Aquila, Inc.
4 effective July 5, 2007 (Case No. ER-2007-0004). Aquila Inc. was subsequently acquired by
5 Great Plains Energy, Inc. and renamed to KCP&L Greater Missouri Operations (“GMO”), with
6 GMO being renamed to Evergy Missouri West, Inc. after the merger with Westar Energy, Inc.
7 Since its initial approval of the FAC in 2007, the Commission has approved continuation of
8 EMW’s FAC with modifications in its orders in EMW’s subsequent rate cases, Case Nos.
9 ER-2009-0090, ER-2010-0356, ER-2012-0175, ER-2016-0156, and ER-2018-0146.
10 Every case since the inception of the FAC in the 2007 general rate case has included a 95%/5%
11 sharing mechanism.

12 Q. In Case No. ER-2018-0146, the case under which the FAC tariffs were in effect
13 for the Winter Storm Uri time period, what was the Company’s position on the FAC sharing
14 mechanism?

15 A. The Company proposed continuation of its FAC, and to include the current
16 95%/5% sharing mechanism.¹¹ Which is again, ultimately what the Commission has approved
17 in every case since ER-2007-0004.

18 Q. According to the statute, how can this sharing mechanism be changed?

19 A. In RSMo 386.266.5 it states, “The Commission shall have the power to approve,
20 modify, or reject adjustment mechanisms submitted under subsections 1 to 4 of this section
21 only after providing the opportunity for a full hearing in a general rate case proceeding,
22 including a general rate proceeding initiated by compliant.”

¹¹ ER-2018-0146, Rush Direct Testimony, page 4, lines 2-3.

1 Q. Is this a general rate proceeding as referred to in the statute?

2 A. No. This is a securitization case, another mechanism used to recover the
3 extraordinary costs of fuel and purchased power costs, which are traditionally recovered in the
4 FAC mechanism.

5 Q. Why should Winter Storm Uri costs be treated the same as if they were being
6 passed through an FAC proceeding since EMW is seeking recovery under a different
7 mechanism?

8 A. As recognized in EMW witness Darrin Ives' direct testimony, the customary
9 way the Company would be recovering these costs if they were not securitized, would be
10 through the FAC, which is the mechanism the Company typically uses to recover fuel and
11 related costs it incurs on behalf of its customers. However, recovery through the FAC would
12 cause extreme customer rate impacts.¹² Staff points out that the FAC mechanism is what the
13 company is required to use to recover fuel and related costs once the FAC has been established
14 and approved by the commission in a general rate proceeding.¹³ Under the FAC mechanism,
15 the Company may defer extraordinary costs, but the FAC mechanism does not authorize
16 recovery of 100% of those extraordinary costs.

17 The Company removed these costs from the FAC and sought recovery of them in this
18 securitization case because recovering the entirety of the Winter Storm Uri through the FAC

¹² EF-2022-0155, Ives Direct Testimony, page 13, lines 15-16.

¹³ Commission Rule 20 CSR 4240-20-090(2) states: "An electric utility may only file a request with the commission to establish, continue, or modify a RAM in a general rate proceeding and must rebase base energy costs in each general rate proceeding in which the FAC is continued and modified. Any party in a general rate proceeding may seek to continue, modify, or oppose the RAM. The commission shall approve, modify, or reject such request only after providing the opportunity for a full hearing in a general rate proceeding. The commission shall consider all relevant factors that may affect the costs or overall rates and charges of the petitioning electric utility." The deferral of extraordinary costs through the FAC is authorized by 20 CSR 4240-2-090(8)(A)2.A.(XI).

1 would create extreme customer rate impacts, a circumstance often referred to as “rate shock”.¹⁴
2 However, the fuel and purchased power costs the Company removed from the FAC and is
3 seeking recovery of in this securitization case, are the same fuel and purchased power costs that
4 would have otherwise been recovered through the FAC. EMW’s proposal to securitize 100%
5 of the extraordinary costs of fuel and purchased power costs contradicts the FAC and the
6 95%/5% sharing mechanism that is required to be applied to fuel and purchased power costs. It
7 also causes additional harm to customers in this case, through additional charges to customers,
8 that otherwise would not occur through the FAC and the 95%/5% sharing mechanism.
9 Therefore, it is Staff’s position that since the standard recovery of fuel and purchased power
10 costs through the FAC would have required the Company to absorb the 5% portion of these
11 under-collected costs, this 5%, or \$14,771,657.61 in this case, should not be allowed to be
12 recovered by the Company as part of the total securitized costs.

13 Q. What findings did the Commission rely on in its authorizing a FAC for
14 Aquila, Inc. in Case No. ER-2007-0004?

15 A. In its *Report and Order* in that case, the Commission found that “after-the-fact
16 prudence reviews alone are insufficient to assure Aquila will continue to take reasonable steps
17 to keep its fuel and purchased power costs down, and the easiest way to ensure a utility retains
18 the incentive to keep fuel and purchased power costs down is to not allow a 100% pass through
19 of those costs.”¹⁵ The Commission went on to say that “allowing Aquila to pass 95% of its
20 prudently incurred fuel and purchased power costs, above those included in its base rates,
21 through its fuel adjustment clause is appropriate. With a 95% pass-through, the Commission

¹⁴ EF-2022-0155, Ives Direct Testimony, page 15, lines 5-8.

¹⁵ Case No. ER-2007-0004, Report and Order, page 54.

1 finds Aquila will be protected from extreme fluctuations in fuel and purchased power cost, yet
2 retain a significant incentive to take all reasonable actions to keep its fuel and purchased power
3 costs as low as possible, and still have an opportunity to earn a fair return on its investment.”¹⁶

4 Q. If the Company is allowed to recover 100% of its fuel and purchased power costs
5 through securitization, what consequences could that lead to for ratepayers?

6 A. As previously mentioned, the Commission itself recognized that a 95/5 sharing
7 mechanism allowed the Company to “retain a significant incentive to take all reasonable actions
8 to keep its fuel and purchased power costs as low as possible, and still have an opportunity to
9 earn a fair return on its investment.” If now, through securitization, the Company is allowed to
10 recover 100% of its fuel and purchased power costs, a perverse incentive is created. The
11 perverse incentive is two-fold. First, the Company is incentivized to move as much fuel and
12 purchased power out of the FAC, where those costs are typically passed through and there is a
13 95/5 sharing mechanism, to securitization where they can recover 100%. Second, in the event
14 there is another extreme event similar to Winter Storm Uri, the Company no longer has
15 significant incentive to take all reasonable actions to keep its fuel and purchased power costs
16 as low as possible. Instead, regardless of how high fuel and purchased power costs go, if the
17 Company is allowed to recover 100% of its fuel and purchased power costs, the Company is
18 less incentivized to keep its fuel and purchased power costs as low as possible. The Company
19 would now bear no risk for those costs and instead, all risk is shifted to ratepayers.

20 Q. Is Staff’s position on the 5% disallowance consistent with any recent filings with
21 the Commission regarding Winter Storm Uri costs and/or revenues?

¹⁶ Ibid.

1 A. Yes. In Case No. ER-2022-0025, the Commission ordered Evergy Metro, Inc.,
2 d/b/a Evergy Missouri Metro to include in that FAR filing the extraordinary revenues resulting
3 from Winter Storm Uri. In their substituted filing in that case, Evergy Missouri Metro computed
4 the included amount based on 95% of the revenues, after reduction for the appropriate
5 jurisdictional factor, thus taking into account the 5%.

6 Q. Does the securitization statute allow for a sharing mechanism?

7 A. Similar to the FAC statute, RSMo 386.266, the securitization statute,
8 RSMo 393.1700, does not explicitly mention a sharing mechanism. However, there are
9 multiple references within the statute to the Commission’s authority to approve “subject to
10 conditions.” For example, RSMo 393.1700 2.(3)(a)b. provides that:

11 No later than two hundred fifteen days after the date the petition is filed,
12 the commission shall issue a financing order approving the petition, an
13 order approving the petition **subject to conditions**, or an order
14 rejecting the petition; provided, however, that the electrical corporation
15 shall provide notice of intent to file a petition for a financing order to
16 the commission no less than sixty days in advance of such filing;
17 [Emphasis added.]

18 Q. What is Staff’s recommendation in this case regarding the 95%/5% sharing
19 mechanism of total deferred fuel and purchased power costs?

20 A. Staff recommends the Commission order EMW to remove the 5% portion of the
21 total deferred fuel and purchased power costs they are seeking to recover as part of its total
22 securitized costs, which is \$14,771,657.61.

23 Q. Does this conclude your rebuttal testimony?

24 A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Evergy)
Missouri West, Inc. d/b/a Evergy Missouri) Case No. EF-2022-0155
West for a Financing Order Authorizing the)
Financing of Extraordinary Storm Costs)
Through an Issuance of Securitized Utility)
Tariff Bonds)

AFFIDAVIT OF BRAD J. FORTSON

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW BRAD J. FORTSON and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of Brad J. Fortson*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.



BRAD J. FORTSON

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 27th day of June 2022.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070


Notary Public

Brad J. Fortson

Education and Employment Background

I am the Regulatory Compliance Manager of the Energy Resources Department, Industry Analysis Division of the Missouri Public Service Commission. Prior to my current position, I was employed at the Missouri Public Service Commission as a Regulatory Economist from December 2012 through March 2015 and August 2015 through February 2019.

I received an Associate of Applied Science degree in Computer Science in May 2003, Bachelor of Science degree in Business Administration in May 2009, and Master of Business Administration degree with an emphasis in Management in May 2012, all from Lincoln University, Jefferson City, Missouri.

Prior to first joining the Commission, I worked in various accounting positions within four state agencies of the State of Missouri. I was employed as an Account Clerk II for the Inmate Finance Section of the Missouri Department of Corrections; as an Account Clerk II for the Accounts Payable Section of the Missouri Department of Health and Senior Services; as a Contributions Specialist for the Employer Accounts Section of the Missouri Department of Labor and Industrial Relations; and as an Accountant I for the Payroll Section of the Missouri Office of Administration. From April 1 through July 31, 2015, I worked for the Missouri Office of Public Counsel before joining the Commission once again.

Brad J. Fortson

Case Participation History

Case Number	Company	Issue	Exhibit
HR-2014-0066	Veolia Energy Kansas City	Revenue by Class and Rate Design	Staff Report
GR-2014-0086	Summit Natural Gas of Missouri, Inc.	Large Volume Service Revenue	Staff Report
ER-2014-0258	Union Electric Company d/b/a Ameren Missouri	Revenue by Class and Rate Design	Staff Report
ER-2014-0258	Union Electric Company d/b/a Ameren Missouri	Revenue by Class and Rate Design	Staff Report, Rebuttal & Surrebuttal Testimony
ER-2014-0351	The Empire District Electric Company	Revenue by Class and Rate Design	Staff Report & Rebuttal Testimony
ER-2014-0351	The Empire District Electric Company	Revenue by Class and Rate Design	Rebuttal Testimony
EO-2015-0240	Kansas City Power & Light Company	Custom Program Incentive Level	Direct Testimony
EO-2015-0241	KCP&L Greater Missouri Operations Company	Custom Program Incentive Level	Direct Testimony
ER-2016-0023	The Empire District Electric Company	DSM Programs and MEEIA Filings	Staff Report
ER-2016-0023	The Empire District Electric Company	DSM Programs and MEEIA Filings	Staff Report, Rebuttal & Surrebuttal Testimony
EM-2016-0213	The Empire District Electric Company (merger case)	DSM Programs and MEEIA Filings	Rebuttal & Surrebuttal Testimony
ER-2016-0156	KCP&L Greater Missouri Operations Company	MEEIA summary and LED street lighting	Staff Report
EO-2016-0183	Kansas City Power & Light Company	MEEIA prudence review	Staff Report
EO-2016-0223	The Empire District Electric Company	Triennial compliance filing	Staff Report
ER-2016-0285	Kansas City Power & Light Company	LED street lighting	Staff Report
ER-2016-0179	Union Electric Company d/b/a Ameren Missouri	LED street lighting	Staff Report
ER-2016-0285	Kansas City Power & Light Company	Response to Commissioner questions	Staff Report
ER-2016-0179	Union Electric Company d/b/a Ameren Missouri	Response to Commissioner questions	Staff Report
EO-2017-0209	Kansas City Power & Light Company	MEEIA prudence review	Staff Report
EO-2017-0210	KCP&L Greater Missouri Operations Company	MEEIA prudence review	Staff Report
EO-2015-0055	Union Electric Company d/b/a Ameren Missouri	Flex pay pilot program	Rebuttal Testimony
GR-2018-0013	Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities	Red Tag Program and Energy Efficiency Program Funding	Staff Report, Rebuttal & Surrebuttal Testimony
ER-2018-0145	Kansas City Power & Light Company	LED street lighting, TOU rates	Rebuttal Testimony
ER-2018-0146	KCP&L Greater Missouri Operations Company	LED street lighting, TOU rates	Rebuttal Testimony
EO-2018-0211	Union Electric Company d/b/a Ameren Missouri	Program Design	Rebuttal Report & Surrebuttal Testimony
EO-2019-0132	Kansas City Power & Light Company	Program Design	Rebuttal Report & Surrebuttal Testimony
EO-2019-0376	Union Electric Company d/b/a Ameren Missouri	MEEIA prudence review	Direct Testimony
ER-2019-0374	The Empire District Electric Company	Hedging policy and EE/LI programs	Supplemental Testimony
EO-2020-0280	Evergy Metro	IRP Annual Update	Staff Report
EO-2020-0281	Evergy Missouri West	IRP Annual Update	Staff Report
ER-2020-0311	The Empire District Electric Company	Fuel Adjustment Clause	Rebuttal Testimony
EO-2020-0227	Evergy Metro and Evergy Missouri West	MEEIA prudence review	Direct Testimony
EO-2020-0262	Evergy Metro and Evergy Missouri West	FAC prudence review	Direct & Rebuttal Testimony
EO-2021-0021	Union Electric Company d/b/a Ameren Missouri	Triennial compliance filing	Staff Report
EO-2021-0035	Evergy Metro	Triennial compliance filing	Staff Report
EO-2021-0036	Evergy Missouri West	Triennial compliance filing	Staff Report
EO-2021-0416	Evergy Missouri West	MEEIA prudence review	Staff Report
EO-2021-0417	Evergy Metro	MEEIA prudence review	Staff Report
EO-2022-0061	Evergy Missouri West	Application for Special Rate	Rebuttal Testimony
EO-2022-0064	Evergy Missouri Metro	FAC prudence review	Direct Testimony
EO-2022-0065	Evergy Missouri West	FAC prudence review	Direct Testimony
EO-2022-0040	The Empire District Electric Company	Securitization	Rebuttal Testimony
ER-2022-0129	Evergy Missouri Metro	FAC	Direct Testimony
ER-2022-0130	Evergy Missouri West	FAC	Direct Testimony