

# Exhibit No. 279P

MoPSC Staff – Exhibit 279P  
J Luebbert  
True-up Rebuttal Testimony  
File Nos. ER-2022-0129 & ER-2022-0130

*Exhibit No.:*  
*Issue(s):* *Purchased Power*  
*Agreement allocation*  
*Witness:* *J Luebbert*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *True-Up Rebuttal*  
*Testimony*  
*Case Nos.:* *ER-2022-0129 and*  
*ER-2022-0130*  
*Date Testimony Prepared:* *August 25, 2022*

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**TARIFF/RATE DESIGN DEPARTMENT**

**TRUE-UP REBUTTAL TESTIMONY**

**OF**

**J LUEBBERT**

**Evergy Metro, Inc. d/b/a Evergy Missouri Metro**  
**Case No. ER-2022-0129**

**Evergy Missouri West, Inc. d/b/a Evergy Missouri West**  
**Case No. ER-2022-0130**

*Jefferson City, Missouri*  
*August 2022*

**\*\* Denotes Confidential Information \*\***

1                                   **TRUE-UP REBUTTAL TESTIMONY**

2   **OF**

3   **J LUEBBERT**

4                                   **Evergy Metro, Inc. d/b/a Evergy Missouri Metro**  
5   **Case No. ER-2022-0129**

6                                   **Evergy Missouri West, Inc. d/b/a Evergy Missouri West**  
7   **Case No. ER-2022-0130**

8           Q.     Please state your name and business address.

9           A.     My name is J Luebbert. My business address is P. O. Box 360, Suite 700,  
10          Jefferson City, MO 65102.

11          Q.     By whom are you employed and in what capacity?

12          A.     I am the Tariff/Rate Design Department Manager for the Missouri Public  
13          Service Commission (“Commission”).

14          Q.     Are you the same J Luebbert that filed direct testimony in this case on June 8,  
15          2022 and rebuttal testimony on July 13, 2022?

16          A.     Yes.

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

18          A.     My testimony responds to a partial change in the Evergy Missouri West  
19          (“EMW”) allocation of Cimarron Bend III wind Purchased Power Agreement (PPA) provided  
20          in the workpaper of EMW witness Linda Nunn.

21          Q.     How is the change in allocation of the Cimarron Bend III wind PPA reflected in  
22          Ms. Nunn’s workpaper provided in support of her true-up direct testimony?

1           A.     Ms. Nunn appears to indicate in her workbook that the nameplate capacity of  
2 the wind PPA assigned to Nucor has changed from \*\* [REDACTED]

3 [REDACTED]  
4 [REDACTED] \*\*

5           Q.     Is this changed allocation consistent throughout Ms. Nunn's supportive  
6 workbook?

7           A.     No. Based on a limited review, it appears that the new allocation is only applied  
8 to the capacity portion of costs associated with Nucor service.

9           Q.     Did EMW provide Staff or the Commission with formal notice of the decision  
10 to change the allocation of the wind PPA to Nucor?

11          A.     No. Staff first discovered the potential change in allocation through the course  
12 of discovery in this case. Based on the response to Staff data request 248.3, \*\* [REDACTED]

13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED] \*\* EMW's currently effective tariff indicates that 75 MW of the  
17 total nameplate capacity is currently allocated to the Renewable Energy Rider.<sup>1</sup>

18          Q.     Is Staff opposed to changes in allocation of the wind PPA for Schedule SIL?

19          A.     Not necessarily, but the change in allocation should be consistent, transparent,  
20 and Staff and other parties need to know the effective date of such changes. If EMW intends to  
21 allocate that portion of the wind PPA to Nucor, the Renewable Energy Rider tariff sheet should

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<sup>1</sup> P.S.C. MO. No. 1 1<sup>st</sup> revised sheet No. 139.7.

1 also be updated accordingly. In order to improve the transparency of future changes in the  
2 allocated amounts of special purpose wind PPAs, Staff recommends that the Commission order  
3 EMW to provide the Commission and Staff with notice of intended changes to the allocations  
4 of special purpose wind PPAs, the reason for the allocation change, the proposed effective date  
5 of the change, and a summary of potential effects on rates or other tariff mechanisms 30 days  
6 prior to such changes taking effect.

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

8 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 ) Case No. ER-2022-0129  
Implement a General Rate Increase for Electric )  
Service )

In the Matter of Evergy Missouri West, Inc. )  
d/b/a Evergy Missouri West's Request for ) Case No. ER-2022-0130  
Authority to Implement a General Rate )  
Increase for Electric Service )

**AFFIDAVIT OF J LUEBBERT**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

COMES NOW J LUEBBERT and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *True-Up Rebuttal Testimony of J Luebbert*; and that the same is true and correct according to his best knowledge and belief.

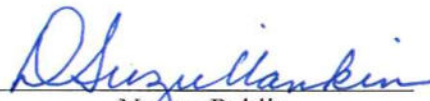
Further the Affiant sayeth not.

  
\_\_\_\_\_  
J LUEBBERT

**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 25<sup>th</sup> day of August 2022.

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

  
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Notary Public