

# Exhibit No. 207

*Issue(s): Fuel Adjustment  
Clause*  
*Witness: Amanda C. Conner*  
*Sponsoring Party: MoPSC Staff*  
*Type of Exhibit: Direct Testimony*  
*Case Nos.: ER-2022-0129 and  
ER-2022-0130*  
*Date Testimony Prepared: June 8, 2022*

**MISSOURI PUBLIC SERVICE COMMISSION**  
**INDUSTRY ANALYSIS DIVISION**  
**ENERGY RESOURCES DEPARTMENT**

**DIRECT TESTIMONY**  
**OF**  
**AMANDA C. CONNER**

**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*  
*June 2022*

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1 **DIRECT TESTIMONY**

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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 Amanda C. Conner

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

11 A. I am employed by the Missouri Public Service Commission (“Commission” or  
12 “PSC”) as a Utility Regulatory Auditor.

13 Q. Please describe your educational background and work experience.

14 A. Please refer to Schedule ACC-d1 attached hereto.

15 Q. Have you previously filed testimony before this Commission?

16 A. Please refer to Schedule ACC-d2 for a list of cases in which I have previously  
17 lead or participated.

18 **EXECUTIVE SUMMARY**

19 Q. What is the purpose of your direct testimony?

20 A. The purpose of my direct testimony is to provide the policy and the history for  
21 the Fuel Adjustment Clause (“FAC”) for Evergy Missouri Metro (“EMM”) and Evergy  
22 Missouri West (“EMW”) as well as the recommendation of continuing EMM’s FAC and  
23 EMW’s FAC.

1           Q.     In summary, what are Staff’s recommendations regarding EMM’s FAC and  
2 EMW’s FAC to the Commission?

3           A.     In summary, Staff makes the following recommendations to EMM’s  
4 and EMW’s FAC:

- 5           1. Continue EMW’s and EMM’s FAC with modifications;
- 6           2. Continue to include one Base Factor in the FAC tariff sheets for EMM and one  
7           Base Factor in the FAC tariff sheets for EMW, calculated from the Net Base  
8           Energy Cost<sup>1</sup> that the Commission includes in the revenue requirement upon which  
9           it sets EMW’s and EMM’s general rates in this consolidated case;
- 10          3. Clarify that the only transmission costs that are included in EMM’s FAC and  
11          EMW’s FAC are those that EMM and EMW incur for purchased power and off-  
12          system sales (“OSS”);
- 13          4. Order EMM to continue to provide the additional information as part of its monthly  
14          reports,<sup>2</sup> as EMM was ordered<sup>3</sup> to do in Case No. ER-2016-0285 and was ordered  
15          to continue to do in Case No. ER-2018-0145 and has continued to provide in its  
16          FAC monthly reports;
- 17          5. Order EMW to continue to provide the additional information as part of its  
18          monthly reports as EMW was ordered<sup>4</sup> to do in Case No. ER-2016-0156 and was

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<sup>1</sup> Net Base Energy Cost is defined in EMW’s Original Sheet No. 127.21 as Net base energy costs ordered by the Commission in the last general rate case consistent with the costs and revenues included in the calculation of the FPA”.

<sup>2</sup> Monthly reports are required by 20 CSR 4240-20.090(5).

<sup>3</sup> Item 535, Page 31 – 32 of the Commission’s *Report and Order*, issued May 3, 2017.

<sup>4</sup> Item 305, Page 13 of the Commission’s *Non-Unanimous Stipulation and Agreement*, issued September 20, 2016 in File No. ER-2016-0156.

1 ordered to continue to do in Case No. ER-2018-0146 and has continued to provide  
2 in its FAC monthly reports.

3 **HISTORY**

4 Q. Please describe the history of EMW's FAC.

5 A. The Commission first authorized a FAC for EMW in its *Report and Order* in  
6 EMW's 2007 general electric rate proceeding (Case No. ER-2007-0004) for EMW's two rate  
7 districts, then called Aquila Networks-MPS and Aquila Networks-L&P, with the original FAC  
8 tariff sheets becoming effective July 5, 2007. In EMW's subsequent electric rate cases, Case  
9 Nos. ER-2009-0090, ER-2010-0356, ER-2012-0175, ER-2016-0156, and ER-2018-0146, the  
10 Commission authorized continuation with modifications of EMW's FAC. The primary features  
11 of EMW's present FAC (tariff sheets numbered 127.13 through 127.22) include:

- 12 • Two 6-month accumulation periods: June through November and  
13 December through May;
- 14 • Two 12-month recovery periods: March through February and September  
15 through August;
- 16 • Two fuel adjustment rate ("FAR") filings annually, not later than January 1  
17 and July 1;
- 18 • A 95%/5% sharing mechanism<sup>5</sup>;
- 19 • FARs for individual service classifications are rounded to the nearest  
20 \$0.00001, and charged on each applicable kWh billed;
- 21 • True-up of any over- or under-recovery of revenues following each  
22 recovery period, with true-up amounts being included in determination of  
23 FARs for a subsequent recovery period; and

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<sup>5</sup> The FAC requires EMM and EMW to accumulate its total energy costs over a six month accumulation period, followed by a six month recovery period during which 95% of the over- or under-recovery of Total Energy Costs over or under the Base Energy Costs is either returned to or collected from customers. This mechanism allows the Company to retain 5% of any over-collected amounts and requires the Company to absorb 5% of any under-collected amounts for each accumulation period.

- 1           • Prudence reviews of the costs subject to the FAC shall occur no less  
2           frequently than every eighteen (18) months.

3           In EMW's 2018 rate case (Case No. ER-2018-0146), the Base Factor was set at  
4           \$0.02240 per kWh.

5           In the current rate case (Case No. ER-2022-0130), EMW is proposing to re-base the  
6           Base Factor to \$0.02569 per kWh.

7           Q.     Please describe the history of EMM's FAC.

8           A.     The Commission first authorized a FAC for EMM in its *Report and Order* in  
9           EMM's 2015 general electric rate proceeding (Case No. ER-2014-0370), with the original  
10          FAC tariff sheets becoming effective September 29, 2015. EMM is requesting continuance  
11          of the FAC in this rate case. The primary features of EMM's present FAC (tariff sheets  
12          numbered 50.21 through 50.30) include:

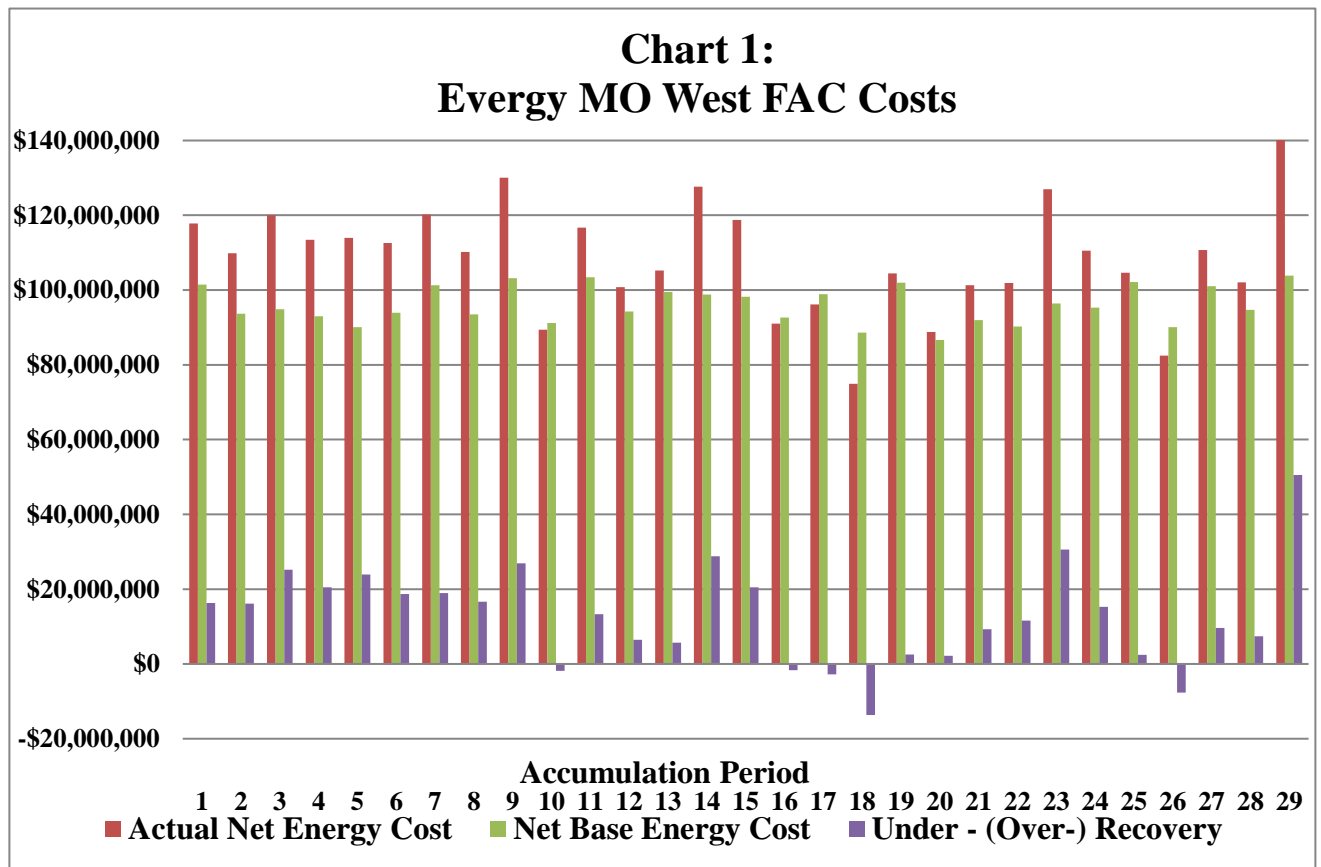
- 13           • Two 6-month accumulation periods: January through June and July through  
14           December;  
15           • Two 12-month recovery periods: October through September and April  
16           through March;  
17           • Two FAR filings annually, no later than February 1 and August 1;  
18           • A 95%/5% sharing mechanism;  
19           • FARs for individual service classifications are rounded to the nearest  
20           \$0.00001, and charged on each applicable kWh billed;  
21           • True-up of any over- or under-recovery of revenues following each  
22           recovery period, with true-up amounts being included in determination of  
23           FARs for a subsequent recovery period; and  
24           • Prudence reviews of the costs subject to the FAC shall occur no less  
25           frequently than every eighteen (18) months.

26           In EMM's 2018 general rate case (Case No. ER-2018-0145), the Base Factor was set at  
27           \$0.01675 per kWh. In this case, ER-2022-0129, EMM is proposing to re-base the FAC Base  
28           Factor to \$0.01726 per kWh.

**CONTINUATION OF FAC**

Q. Please explain the historical operation of EMV’s FAC.

A. EMW has filed for and received approval of changes to its FARs for twenty-nine (29) completed accumulation periods (“AP”) (AP1 through AP29). Chart 1 shows EMW’s Actual Net Energy Cost (“ANEC”)<sup>6</sup> has exceeded the then-effective Base Factors multiplied by monthly usage billed to EMW’s customers’ in twenty-four (24) out of the twenty-nine (29) completed accumulation periods and are illustrated as under-recovery amounts prior to application of the jurisdictional factor.



<sup>6</sup> “Actual Net Energy Costs” are equal to fuel costs (FC) plus net emission costs (E) plus purchased power costs (PP) plus transmission costs (TC) minus off-system sales revenue (OSSR) and renewable energy credit revenue (R) as defined on EMM’s Original Sheet No. 50.22 and on EMW’s Original Sheet No. 127.14.



1 The time periods of the accumulation periods (“APs”) in Chart 1 is as follows:

2 AP1: June 2007 – Nov 2007	AP2: Dec 2007 – May 2008
3 AP3: June 2008 – Nov 2008	AP4: Dec 2008 – May 2009
4 AP5: June 2009 – Nov 2009	AP6: Dec 2009 – May 2010
5 AP7: June 2010 – Nov 2010	AP8: Dec 2010 – May 2011
6 AP9: June 2011 – Nov 2011	AP10: Dec 2011 – May 2012
7 AP11: June 2012 – Nov 2012	AP12: Dec 2012 – May 2013
8 AP13: June 2013 – Nov 2013	AP14: Dec 2013 – May 2014
9 AP15: June 2014 – Nov 2014	AP16: Dec 2014 – May 2015
10 AP17: June 2015 – Nov 2015	AP18: Dec 2015 – May 2016
11 AP19: June 2016 – Nov 2016	AP20: Dec 2016 – May 2017
12 AP21: June 2017 – Nov 2017	AP22: Dec 2017 – May 2018
13 AP23: June 2018 – Nov 2018	AP24: Dec 2018 – May 2019
14 AP25: June 2019 – Nov 2019	AP26: Dec 2019 – May 2020
15 AP27: June 2020 – Nov 2020	AP28: Dec 2020 – May 2021
16 AP29: June 2021 – Nov 2021	

17 During five accumulation periods, AP10, AP16, AP17, AP18, and AP26, EMW’s  
18 Net Base Energy Cost (“NBEC”)<sup>7</sup> exceeded ANEC; 95% of such excess amounts were returned  
19 to customers during five recovery periods (“RP”) RP10, RP16, RP17, RP18, and RP26. In  
20 twenty-four (24) of its accumulation periods (AP1, AP2, AP3, AP4, AP5, AP6, AP7, AP8, AP9,  
21 AP11, AP12, AP13, AP14, AP15, AP19, AP20, AP21, AP22, AP23, AP24, AP25,  
22 AP27, AP28, and AP29), EMW under-collected its ANEC, and 95% of the amounts of  
23 under-collection were recovered from EMW’s customers during recovery periods RP1, RP2,  
24 RP3, RP4, RP5, RP6, RP7, RP8, RP9, RP11, RP12, RP13, RP14, RP15, RP19, RP20, RP21,  
25 RP22, RP23, RP24, RP25, RP27, RP28, and RP29.

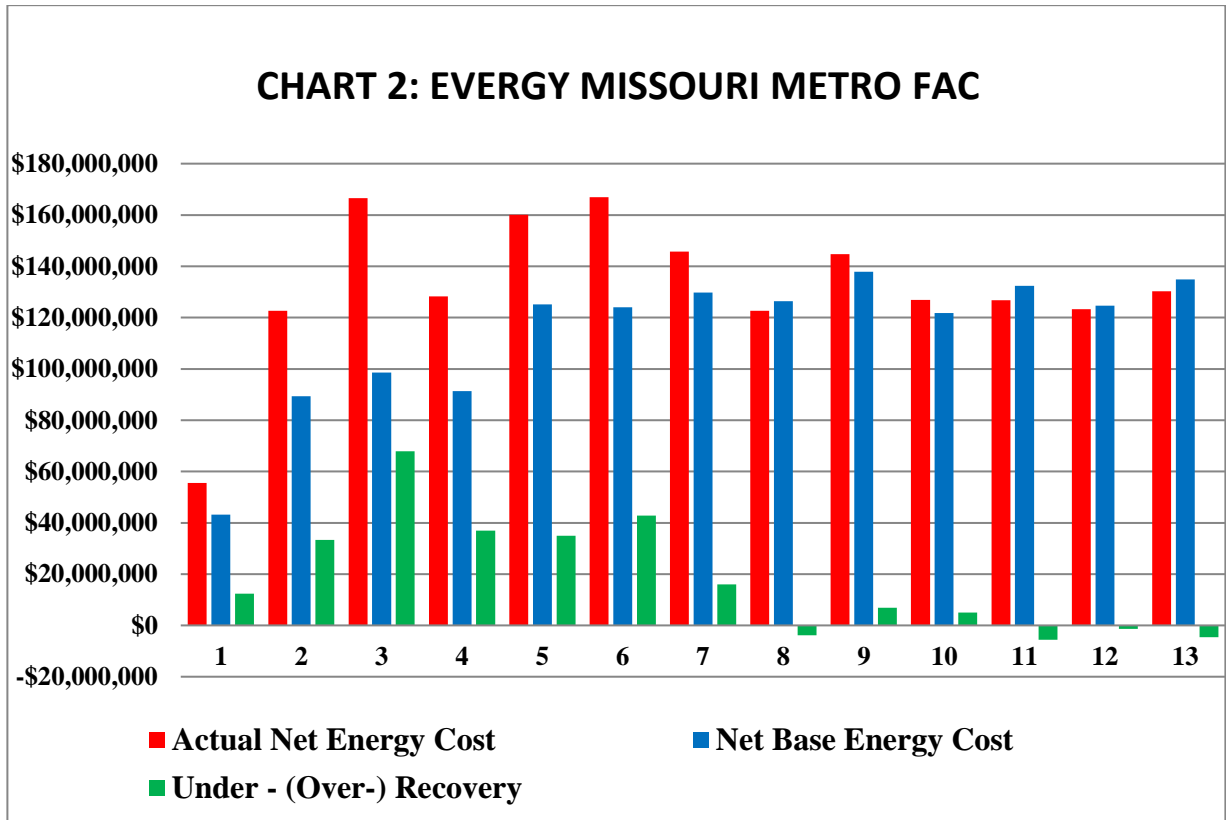
26 Q. Please explain the historical operation of EMM’s FAC.

27 A. EMM has filed for and received approval of changes to its FARs for thirteen (13)  
28 completed APs. Chart 2 shows EMM’s ANEC has exceeded the then-effective Base

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<sup>7</sup> Net base energy costs (B) is defined on EMM’s Original Sheet No. 50.28 and on EMW’s Original Sheet No. 127.21 as net base energy costs ordered by the Commission in the last general rate case consistent with the costs and revenues included in the calculation of the FPA. Net base energy costs will be calculated as shown below  $S_{AP} \times \text{Base Factor (“BF”)}$ .

1 Factors multiplied by monthly usage billed to EMM’s customers’ in nine (9) out of the  
2 thirteen (13) completed accumulation periods and are illustrated as under-recovery amounts  
3 prior to application of the jurisdictional factor.



4  
5 The time periods of the thirteen (13) APs are:

- |  |                            |
|--|----------------------------|
| 6 AP1: Sept 2015 <sup>8</sup> – Dec 2015 | AP2: Jan 2016 – June 2016  |
| 7 AP3: July 2016 – Dec 2016              | AP4: Jan 2017 – June 2017  |
| 8 AP5: July 2017 – Dec 2017              | AP6: Jan 2018 – June 2018  |
| 9 AP7: July 2018 – Dec 2018              | AP8: Jan 2019 – June 2019  |
| 10 AP9: July 2019 – Dec 2019             | AP10: Jan 2020 – June 2020 |
| 11 AP11: July 2020 – Dec 2020            | AP12: Jan 2021 – June 2021 |
| 12 AP13: July 2021 – Dec 2021            |                            |

13 During four accumulation periods, AP8, AP11, AP12, and AP13, EMM’s NBE Cost exceeded  
14 ANEC; 95% of such excess amounts were returned to customers during four recovery periods,

<sup>8</sup> September 29, 2015 was the effective date of rates for Rate Case No. ER-2014-0370.

1 RP8, RP11, RP12, and RP13. In nine of its accumulation periods (AP1, AP2, AP3, AP4, AP5,  
2 AP6, AP7, AP9, and AP10), EMM under-collected its ANEC, and 95% of the amounts of  
3 under-collection were recovered from EMM's customers during recovery periods RP1, RP2,  
4 RP3, RP4, RP5, RP6, RP7, RP9, and RP10.

5 Q. What do EMM's and EMW's actual FAC costs include?

6 A. Actual FAC costs include: EMW's and EMM's total booked costs as allocated  
7 for fuel consumed in the EMW's and EMM's respective generating units; purchased power  
8 energy charges, including applicable transmission fees; SPP variable costs; air quality control  
9 system consumables, such as anhydrous ammonia, limestone, and powder activated carbon, and  
10 net emission allowance costs. Actual FAC costs are offset by actual revenue from Off-System  
11 Sales and actual revenue from the sale of Renewable Energy Credits.

12 Q. Has EMM under-recovered any amount?

13 A. Yes, Chart 3 illustrates the cumulative amounts<sup>9</sup> by which EMM's ANEC have  
14 exceeded the Base Factor, multiplied by monthly usage billed to EMM's customers in the  
15 completed accumulation periods.

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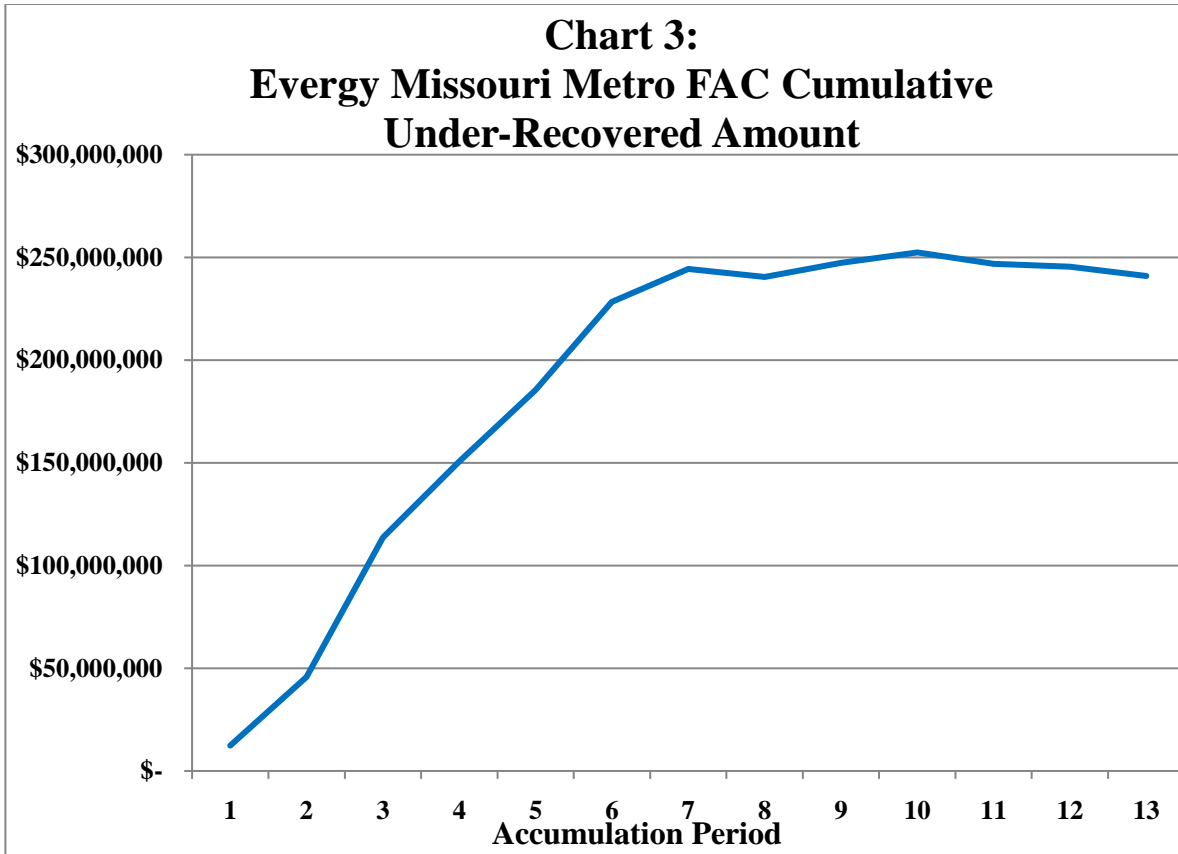
20 *continued on next page*

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<sup>9</sup> Amounts represent an aggregate of energy costs for Missouri and Kansas prior to application of jurisdictional factor (J).

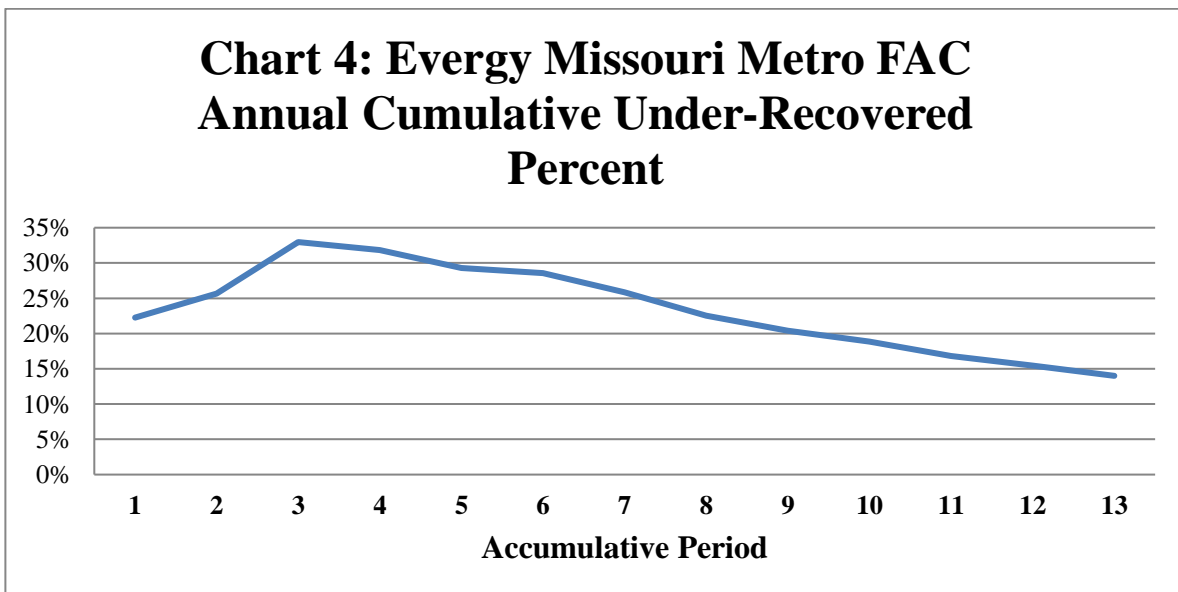
$J = \text{Missouri Retail Energy Ratio} = (\text{MO Retail kWh sales} + \text{MO Losses}) / (\text{MO Retail kWh Sales} + \text{MO Losses} + \text{KS Retail kWh Sales} + \text{KS Losses} + \text{Sales for Resale, Municipals kWh Sales [includes border customers]} + \text{Sales for Resale, Municipals Losses}).$

1



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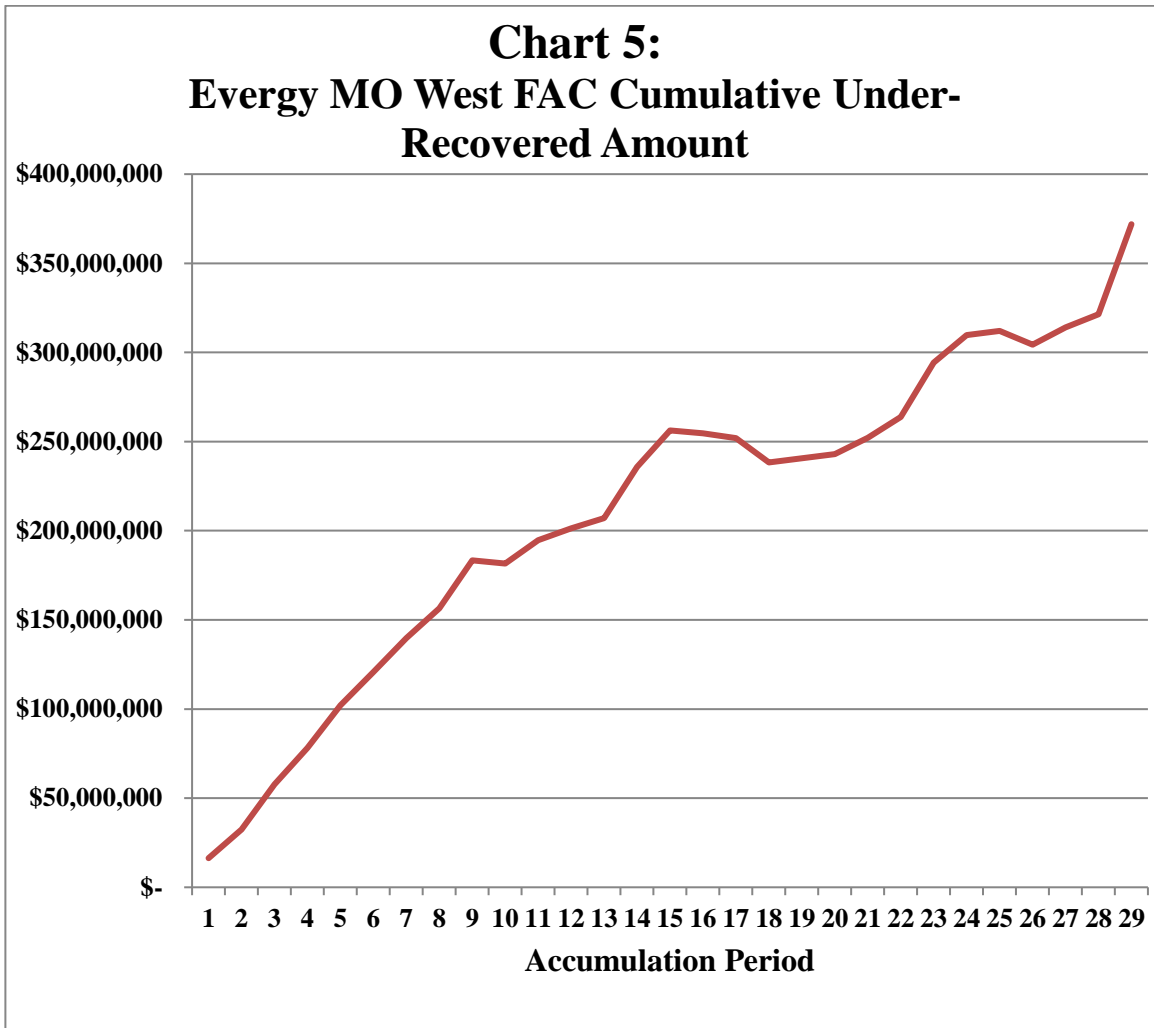
3 For AP1 through AP13, Chart 4 illustrates the cumulative under-collected amount is about  
4 14 % of the cumulative ANEC for EMM.



5

1 Q. Has EMW under recovered any amount?

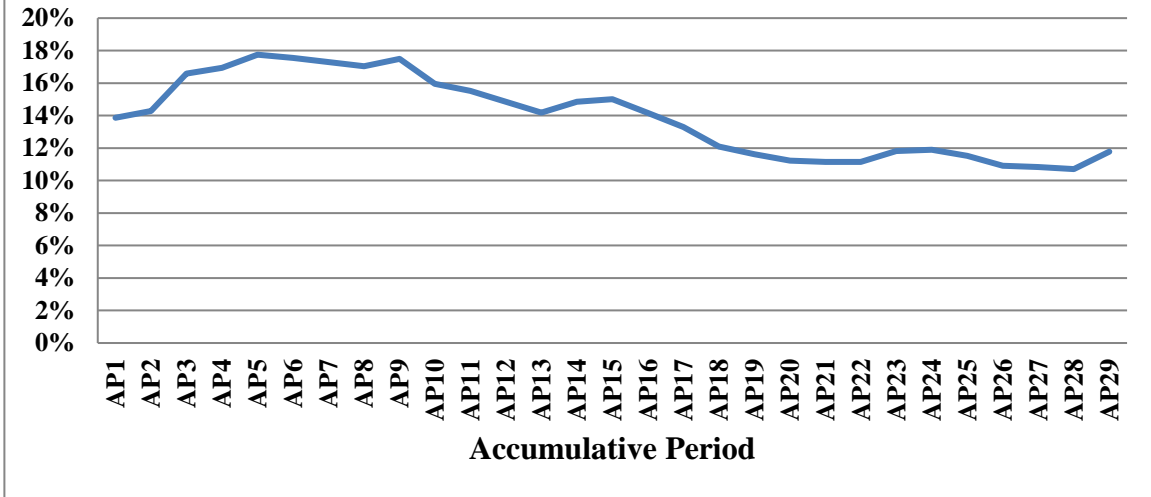
2 A. Charts 5 and 6 illustrates EMW's cumulative under-recovered amount over  
3 eleven (11) years is approximately \$372 million or about 11 % of the cumulative ANEC.  
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**Chart 6: Evergy MO West FAC Cumulative Under-Recovered Percent**



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2  
3 Q. Does Staff recommend the continuation of EMW’s and EMM’s FAC? If so,  
4 explain why.

5 A. Yes. Staff recommends that the Commission approve, with modifications, the  
6 continuation of EMW’s FAC and EMM’s FAC. As shown in the previous charts and  
7 discussion, EMW’s and EMM’s ANEC continue to be relatively large and volatile.

8 At this time, Staff does not have its estimates for the Base Factor for either FAC, but  
9 will provide them and a discussion on the calculation of each Base Factor when Staff files its  
10 Class Cost of Service/Rate Design Report on June 22, 2022. Staff will use the NBEC and the  
11 kWh at the generator from its fuel run for EMM and EMW, respectively, to develop each  
12 utility’s Base Factor.

13 Q. Is setting the Base Factor in EMW’s and EMM’s FAC tariff sheets  
14 critical?

15 A. Yes. Correctly setting the Base Factor in EMW’s and EMM’s FAC tariff sheets  
16 is critical to both a well-functioning FAC and a well-functioning FAC sharing mechanism. For

1 the reasons below, Staff recommends the Commission require the Base Factor in EMW's and  
2 EMM's FAC be set based on the Base Energy Cost that the Commission includes in the revenue  
3 requirement on which it sets EMW's and EMM's general rates in this case.

4 Q. Please provide examples illustrating why setting the base factor is so critical.

5 A. Table 1 below shows the three scenarios in which the FAC Base Energy Cost  
6 used to set the FAC Base Factor is equal to, less than, or greater than the Base Energy Cost in  
7 the revenue requirement upon which the Commission sets general rates:

Table 1: Base Energy Cost Case Studies				
		Case 1	Case 2	Case 3
Line	<b>95%/5% Sharing Mechanism</b>	Energy Cost in FAC <b>Equal To</b> Base Energy Cost in Rev. Req.	Energy Cost in FAC <b>Less Than</b> Base Energy Cost in Rev. Req.	Energy Cost in FAC <b>Greater Than</b> Base Energy Cost in
a	Revenue Requirement	\$ 10,000,000	\$ 10,000,000	\$ 10,000,000
b	Base Energy Cost in Rev. Req.	\$ 4,000,000	\$ 4,000,000	\$ 4,000,000
c	Base Energy Cost in FAC	\$ 4,000,000	\$ 3,900,000	\$ 4,100,000
<b>Outcome 1: Actual Energy Cost Greater Than Base Energy Cost in Revenue Requirement</b>				
d	Actual Total Energy Cost	\$ 4,200,000	\$ 4,200,000	\$ 4,200,000
	Billed to Customer:			
= b	in Permanent Rates	\$ 4,000,000	\$ 4,000,000	\$ 4,000,000
$e = (d - c) \times 0.95$	through FAC	\$ 190,000	\$ 285,000	\$ 95,000
$f = b + e$	Total Billed to Customers	\$ 4,190,000	\$ 4,285,000	\$ 4,095,000
$g = f - d$	<b>Kept/(Paid) by Company</b>	\$ (10,000)	\$ 85,000	\$ (105,000)
<b>Outcome 2: Actual Energy Cost Less Than Base Energy Cost in Revenue Requirement</b>				
h	Actual Energy Cost	\$ 3,800,000	\$ 3,800,000	\$ 3,800,000
	Billed to Customer:			
= b	in Permanent Rates	\$ 4,000,000	\$ 4,000,000	\$ 4,000,000
$i = (h - c) \times 0.95$	through FAC	\$ (190,000)	\$ (95,000)	\$ (285,000)
$j = b + i$	Total Billed to Customers	\$ 3,810,000	\$ 3,905,000	\$ 3,715,000
$k = j - h$	<b>Kept/(Paid) by Company</b>	\$ 10,000	\$ 105,000	\$ (85,000)

8  
9 Case 1 illustrates that if the FAC Base Energy Cost used for the Base Factor is equal to the  
10 Base Energy Cost in the revenue requirement used for setting general rates, the utility does not  
11 over- or under-collect as a result of the level of total actual energy costs.

1 Case 2 illustrates that if the FAC Base Energy Cost used for the Base Factor is less than  
2 the Base Energy Cost in the revenue requirement used for setting general rates, the utility will  
3 collect more than was intended and customers will pay more than the FAC was designed for  
4 them to pay, regardless of the level of actual energy costs.

5 Case 3 illustrates that if the FAC Base Energy Cost used for the Base Factor is greater  
6 than the Base Energy Cost in the revenue requirement used for setting general rates, the utility  
7 will not collect all of the costs that was intended in the FAC design, and customers will pay less  
8 than the entire amount intended, regardless of the level of actual energy costs.

9 These three cases illustrate the importance of setting the Base Factor in the FAC  
10 correctly, i.e., revising the Base Factor to match the Base Energy Cost in the revenue  
11 requirement used for setting general rates.

12 Q. Which scenario is Staff's preferred case?

13 A. Case 1 is the preferred case, as it illustrates how the FAC is intended to work  
14 because the amount refunded to or collected from customers is closest to zero. In addition,  
15 Outcome 1 and Outcome 2 under Case 1 result in the utility collecting slightly more than what  
16 was intended or the customers pay slightly less than what was intended, as opposed to the more  
17 extreme outcomes under Cases 2 and 3.

18 Q. Does Staff recommend any modifications to the EMW's FAC for any auxiliary  
19 power adjustments in the FAC tariff sheets or FAC base factor calculation?

20 A. Yes. As provided in data request 258 in ER-2022-0130, EMW included  
21 an example for the calculation of an adjustment and journal entry to record an adjustment  
22 made to the FAC for auxiliary power. It was also noted that the auxiliary power general  
23 ledger entry will be separate from the already existing steam transfer credits. Staff



1 believes this adjustment in the FAC is necessary to account for the auxiliary power  
2 steam customers are using, and to reduce the fuel costs for electric customers. Therefore,  
3 Staff agrees with this adjustment to the FAC for auxiliary power and will incorporate  
4 this adjustment in EMW's FAC base factor that will be provided in Staff's Direct Class  
5 Cost of Service Testimony filed on June 22, 2022. This adjustment should also be  
6 incorporated in EMW's FAC tariff sheet language, so it is clear that the adjustment of  
7 reducing fuel costs should be applied during every FAR filing. This additional FAC  
8 tariff language will also be provided in Staff's Direct Class Cost of Service Testimony  
9 filed on June 22, 2022.

10 Q. What additional reporting requirements is Staff proposing for EMW?

11 A. Due to the accelerated Staff review process necessary with FAC adjustment  
12 filings,<sup>10</sup> Staff recommends the Commission order EMW to continue to provide the following  
13 information as part of its monthly reports or at Staff's request:

- 14 1. Monthly SPP market settlements and revenue neutrality uplift charges;
- 15 2. FAC monthly reports;
- 16 3. Within 30 calendar days of the effective date of each and every coal and coal  
17 transportation, natural gas, fuel oil, nuclear fuel, and purchased power  
18 contract EMW enters into, EMW provide both notice to the Staff of the  
19 contract and opportunity to review the contract at EMW's corporate  
20 headquarters or at some other mutually-agreed-upon place;
- 21 4. Maintain at EMW's corporate headquarters or at some other mutually  
22 agreed-upon place and make available within a mutually-agreed-upon time

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<sup>10</sup> The Company must file its FAC adjustment 60 calendar days prior to the effective date of its proposed tariff sheet. Staff has 30 calendar days to review the filing and make a recommendation to the Commission. The Commission then has 30 calendar days to approve or deny Staff's recommendation.

1 for review, a copy of each and every coal and coal transportation, natural  
2 gas, fuel oil and nuclear fuel contract EMW has that is in or was in effect for  
3 the previous four years;

4 5. Provide Staff with a monthly natural gas fuel report that includes all  
5 transactions, spot and longer term; the report will include term, volumes,  
6 price, and analysis of number of bids;

7 6. Notify Staff within 30 calendar days of any material change in EMW's fuel  
8 hedging policy and provide the Staff with access to new written policy;

9 7. Provide Staff its Missouri Fuel Adjustment Interest calculation workpapers  
10 in electronic format with all formulas intact when EMW files for a change  
11 in the cost adjustment factor;

12 8. Provide a copy of EMW's internal policy for participating in the Southwest  
13 Power Pool's Integrated Market;

14 9. If EMW revises any internal policy for participating in the SPP, within  
15 30 calendar days of that revision, provide a copy of the revised policy with  
16 the revisions identified for Staff to retain; and, the monthly as-burned fuel  
17 report supplied by EMW required by 20 CSR 4240-3.190(1)(B) shall  
18 explicitly designate fixed and variable components of the average cost per  
19 unit burned including commodity, transportation, emissions, tax, fuel blend,  
20 and any additional fixed or variable costs associated with the average cost  
21 per unit reported.

22 10. Maintain at EMW's corporate headquarters or at some other mutually  
23 agreed-upon place and make available within a mutually agreed-upon time  
24 for review, a copy of each and every bilateral energy or demand  
25 sales/purchase contract;

26 11. Continue to provide Staff access to all contracts and policies upon  
27 Staff's request, at EMW's corporate office in Kansas City, Missouri.

28 Q. What additional reporting requirements is Staff proposing for EMM?

1           A.     Due to the accelerated Staff review process necessary with FAC adjustment  
2 filings,<sup>11</sup> Staff recommends the Commission again order<sup>12</sup> EMM to continue to provide the  
3 following information as part of its monthly reports or at Staff's request:

- 4           1. Monthly SPP market settlements and revenue neutrality uplift charges;
- 5           2. FAC monthly reports;
- 6           3. As part of the information EMM submits when it files a tariff modification  
7 to change its Fuel and Purchased Power Adjustment rate, include EMM's  
8 calculation of the interest included in the proposed rate;
- 9           4. Maintain at EMM's corporate headquarters or at some other mutually  
10 agreed-upon place and make available within a mutually-agreed-upon time  
11 for review, a copy of each and every coal and coal transportation, natural  
12 gas, fuel oil and nuclear fuel contract EMM has that is in or was in effect for  
13 the previous four years;
- 14          5. Within 30 calendar days of the effective date of each and every coal and coal  
15 transportation, natural gas, fuel oil, nuclear fuel, and purchased power  
16 contract EMM enters into, EMM provide both notice to the Staff of the  
17 contract and opportunity to review the contract at EMM's corporate  
18 headquarters or at some other mutually-agreed-upon place;
- 19          6. Provide a copy of each and every EMM hedging policy that is in effect at  
20 the time the tariff changes ordered by the Commission in the rate case go  
21 into effect for Staff to retain;
- 22          7. Notify Staff within 30 calendar days of any material change in EMM's fuel  
23 hedging policy and provide the Staff with access to new written policy;

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<sup>11</sup> The Company must file its FAC adjustment 60 calendar days prior to the effective date of its proposed tariff sheet. Staff has 30 calendar days to review the filing and make a recommendation to the Commission. The Commission then has 30 calendar days to approve or deny Staff's recommendation.

<sup>12</sup> Page 47 - 48 of the Commission's *Report and Order*, issued September 2, 2015 in Case No. ER-2014-0370.

1 8. Provide a copy of EMM's internal policy for participating in the Southwest  
2 Power Pool's Integrated Market;

3 9. Maintain at EMM's corporate headquarters or at some other mutually  
4 agreed-upon place and make available within a mutually agreed-upon time  
5 for review, a copy of each and every bilateral energy or demand  
6 sales/purchase contract;

7 10. If EMM revises any internal policy for participating in the SPP, within 30  
8 calendar days of that revision, provide a copy of the revised policy with the  
9 revisions identified for Staff to retain; and, the monthly as-burned fuel  
10 report supplied by EMM required by 20 CSR 4240-3.190(1)(B) shall  
11 explicitly designate fixed and variable components of the average cost per  
12 unit burned including commodity, transportation, emissions, tax, fuel blend,  
13 and any additional fixed or variable costs associated with the average cost  
14 per unit reported.

15 11. Continue to provide Staff access to all contracts and policies upon Staff's  
16 request, at EMM's corporate office in Kansas City, Missouri.

17 Q. Is Staff proposing to add new language to EMW's and EMM's FAC tariff?

18 A. Yes. Staff is proposing to add language to EMW's and EMM's FAC tariff  
19 in regards to Purchased Power Agreements ("PPAs") entered into by the Companies.

20 Q. What is Staff proposing in regards to the PPA additional language?

21 A. In summary, Staff is proposing to include additional PPA language in the FAC  
22 tariff sheets that will limit the amount of losses the customers will pay for any new PPAs entered  
23 into after May 2019. Staff witness Brad Fortson will provide additional information and  
24 explanation for this proposed FAC tariff language in Staff's Direct Class Cost of Service  
25 testimony, which will be filed on June 22, 2022.

26 Q. Does this conclude your Direct Testimony?

27 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 ) 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 AMANDA C. CONNER**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

**COMES NOW AMANDA C. CONNER** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Direct Testimony of Amanda C. Conner*; and that the same is true and correct according to her best knowledge and belief.

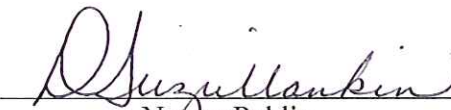
Further the Affiant sayeth not.

  
**AMANDA C. CONNER**

**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 7<sup>th</sup> day of June 2022.



  
Notary Public

## **Amanda C. Conner**

### **Educational Background and Work Experience**

My educational background includes a Bachelor of Science degree in Accounting/Finance from Columbia College in Columbia, Missouri where I graduated in May of 2012.

In February 2016, I started a new career as a Utility Regulatory Auditor I with the Missouri Office of Public Counsel, where I worked for five years providing support and testimony for several rate cases before accepting my position as Regulatory Auditor with the Energy Resources Department of the Missouri Public Service Commission. Since that point, my experience includes Fuel Adjustment Clause Prudence Reviews, Missouri Energy Efficiency Investment Act Prudence Reviews, and Fuel Adjustment Rate filings.

My prior work experience includes eight years with the Missouri Department of Revenue first in the Taxation Division, and then in the General Counsel's Office where I handled taxation issues regarding Bankruptcy.

CASE PROCEEDING PARTICIPATION  
AMANDA C. CONNER, UTILITY REGULATORY AUDITOR

OPC PARTICIPATION		ISSUE	TESTIMONY TYPE	LEAD	STATUS
COMPANY	CASE NUMBER			STAFF	
EMPIRE	ER-2016-0023	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL		
KCPL	ER-2016-0285	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL		
LACLEDE GAS COMPANY	GR-2017-0215	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL, TESTIFIED AT HEARING		
MGE	GR-2017-0216	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL, TESTIFIED AT HEARING		
MAWC	WR-2017-0285	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL		
LIBERTY	GR-2018-0013	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL		
GMO	ER-2018-0146	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL		
KCPL	ER-2018-0145	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL		
EMPIRE	ER-2019-0374	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL, TESTIFIED AT HEARING		
SPIRE	GR-2021-0108	GENERAL RATE CASE	DIRECT		
EMPIRE	ER-2021-0097	FAR FILING-9th REVISED (24th AP)	STAFF REPORT		
EMPIRE	ER-2022-0095	FAR FILING-11TH REVISED (26th AP)	STAFF REPORT		
PSC PARTICIPATION		ISSUE		LEAD	STATUS
COMPANY	CASE NUMBER			STAFF	
EVERGY MO METRO (prior KCPL)	EO-2021-0417	MEEIA PRUDENCE REVIEW (3rd)	STAFF REPORT, DIRECT		*
EVERGY MO METRO (prior KCPL)	EO-2022-0129	GENERAL RATE CASE	COS Direct	*	**
EVERGY MO WEST (prior GMO)	EO-2022-0130	GENERAL RATE CASE	COS Direct	*	**

Status:       \*       In Hearing  
                 \*\*       In Process (working on case)