

# Exhibit No. 277P

MoPSC Staff – Exhibit 277P  
Amanda C. Conner  
True-up Rebuttal Testimony  
File Nos. ER-2022-0129 & ER-2022-0130

*Exhibit No.:*  
*Issue:* *Fuel Adjustment Clause*  
*Witness:* *Amanda C. Conner*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *True-Up*  
*Rebuttal Testimony*  
*Case Nos.:* *ER-2022-0129 &*  
*ER-2022-0130*  
*Date Testimony Prepared:* *August 25, 2022*

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**ENERGY RESOURCES DEPARTMENT**

**TRUE-UP REBUTTAL 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*  
*August 2022*

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**Evergy Missouri West, Inc., d/b/a Evergy Missouri West  
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REVISIED BASE FACTOR.....1  
CHANGES TO FAC TARIFF .....3  
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1 true-up direct base factor calculation for EMM. All of these errors are fixed and incorporated  
2 into the base factors provided above.

3 **CHANGES TO FAC TARIFF**

4 Q. Where did Ms. Nunn make changes in her schedules LJM-9?

5 A. Ms. Nunn changed the J factor on page 13 of LJM-9, which is proposed  
6 FAC tariff sheet 50.39.

7 Q. What is the J factor?

8 A. The J factor is the Missouri Retail Energy Ratio. These include Missouri (“MO”)  
9 and Kansas (“KS”) Loss percentages.

10 Q. What were the changes, and is this the first time Staff has seen this change to  
11 EMM’s FAC tariff sheet?

12 A. Yes, this is the first time Staff has seen this change in the FAC tariff sheet 50.39.  
13 EMM MO Losses changed from 6.32% to 6.09%, and the KS Losses changed from  
14 7.52% to 6.51%.

15 Q. Where did EMM show the data for the change in the MO and KS Losses?

16 A. Prior to Ms. Nunn’s true-up direct testimony’s schedule LJM-9, these  
17 percentages were shown in Table 1 of the Line Loss Study provided in Ms. Nunn’s direct  
18 testimony as Schedule LJM-4.<sup>2</sup> However, in Ms. Nunn’s direct testimony, this change was not  
19 made to page 19 of Schedule LJM-5, which is the schedule for the FAC tariff sheets.

20 Q. Has Ms. Nunn provided any testimony, outside of her schedules explaining this  
21 change to the FAC J factor?

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<sup>2</sup> Direct Testimony of Linda J. Nunn Schedule LJM-4 page 5 of 61, Table 1, Losses-Net System Input.

1           A.     No. Though Staff has no issue with this change, since it can be substantiated  
2 by the line loss study, it should be mentioned that this change should have been made in  
3 Ms. Nunn's Schedule LNJ-5 since it was filed in her direct testimony.

4           Q.     Why is the timing of when Ms. Nunn made this change to the FAC tariff  
5 important?

6           A.     It is important to note that EMM sent responses to Staff data requests 257.1  
7 and 260, where EMM provided updated FAC tariff sheets without filing these tariff updates in  
8 this rate case. However yet not one of the responses provided this J factor update. Because of  
9 this, Staff had to try to verify where these changes came from after the true-up direct testimonies  
10 were filed, which left very little time for any follow-up data requests, if needed, to be sent  
11 before true-up rebuttal testimony was due to be filed in this rate case. This is especially  
12 important, since Ms. Nunn does not indicate in any of her testimony why these changes  
13 were made in true-up direct, or any other testimony she filed in this rate case. If Ms. Nunn had  
14 made a change that could not be verified in a quick and efficient manner, this could have  
15 caused issues for Staff in verifying the prudence of the changes EMM made.

16     **INCLUSION OF REC REVENUES**

17           Q.     In Ms. Mantle's true-up direct testimony, she recommends including REC  
18 revenues in the FAC Base Factors. Does Staff agree with Ms. Mantle's recommendation and  
19 the amounts she used for her recommendation?

20           A.     As Ms. Mantle states in her testimony, EMM and EMW began selling RECs  
21 in February 2022, and she provides an amount for generating revenues of these sold  
22 RECs. The true-up cutoff date in this case is May 2022. For the months of February 2022  
23 through May 2022, Ms. Mantle recommends that \*\* [REDACTED] \*\* be included in

1 EMW's revenue requirement and FAC base factor calculation and \*\* [REDACTED] \*\* be  
2 included in EMM's revenue requirement and FAC base factor calculation. Staff notes that  
3 Ms. Mantle's recommendation is only four months of actual revenues, and not annualized  
4 amounts. These numbers do tie to the FAC monthly reports. However Staff is of the  
5 understanding that the number Ms. Mantle provided for EMM of \*\* [REDACTED] \*\* is for  
6 Everyg as a whole and not specific to Missouri; the Missouri specific amount of REC sales for  
7 February through May 2022 is \*\* [REDACTED] \*\*. Although Staff notes these numbers do tie to  
8 the FAC monthly reports, the monthly reports include other amounts in account 509 for  
9 emissions, so there could be confusion on what specific numbers to use just for REC sales.

10 Staff has not included these amounts in its FAC base factor calculation because there is  
11 not enough months' worth of data at this time to make a fair and accurate recommendation.  
12 Therefore, Staff does not oppose some amount of revenues being included, but due to a lack of  
13 data, Staff is unaware what that amount should be. Staff recommends for all parties to meet  
14 and discuss how we should calculate for the sales of RECs and what portion should be included  
15 in EMM and EMW's base factors going forward.

16 Staff would also like to reiterate that since adding REC sales to the FAC beginning  
17 February 2022, the FAC monthly reports have been difficult to understand what amounts  
18 are specific to REC sales and what amounts are specific to Emission allowances, etc, as  
19 mentioned above. Therefore, Staff also recommends that account 509000 be broken down by  
20 resource codes for REC sales and Emissions and that information be provided in the FAC  
21 monthly reports.

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

23 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 *True-Up Rebuttal Testimony of Amanda C. Conner*; and that the same is true and correct according to her best knowledge and belief.

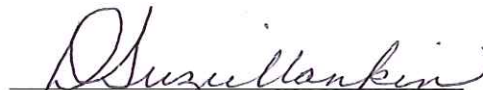
Further the Affiant sayeth not.

  
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 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

  
Notary Public