

Exhibit No. 301

Exhibit No.:
Issue(s): FAC Tariff Sheets
Witness/Type of Exhibit: Mantle/Direct
Sponsoring Party: Public Counsel
Case No.: ER-2022-0129 and ER-2022-0130

DIRECT TESTIMONY

OF

LENA M. MANTLE

Submitted on Behalf of the Office of the Public Counsel

**EVERGY METRO, INC. D/B/A
EVERGY MISSOURI METRO
AND
EVERGY MISSOURI WEST, INC. D/B/A
EVERGY MISSOURI WEST**

CASE NOS. ER-2022-0129 AND ER-2022-0130

June 22, 2022

DIRECT TESTIMONY

OF

LENA M. MANTLE

**EVERGY METRO
CASE NO. ER-2022-0129**

**EVERGY WEST
CASE NO. ER-2022-0130**

1 **Q. What are your name and business address?**

2 A. My name is Lena M. Mantle and my business address is P.O. Box 2230, Jefferson
3 City, Missouri 65102.

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

5 A. I am employed by the Missouri Office of the Public Counsel (“OPC”) as a Senior
6 Analyst.

7 **Q. On whose behalf are you testifying?**

8 A. I am testifying on behalf of the OPC.

9 **Q. Are you the same Lena M. Mantle that provided revenue requirement direct**
10 **testimony?**

11 A. Yes.

12 **Q. What are you recommending in this testimony?**

13 A. In my revenue requirement I recommended changes be made to Evergy’s fuel
14 adjustment clauses (FACs). I have attached to this testimony two exemplar sets of
15 tariff sheets, Schedules LMM-D-3 and LMM-D-4¹ that incorporate the changes that
16 I proposed in my revenue requirement testimony.

¹ Schedules LMM-D-1 and LMM-D-2 are attached to my revenue requirement direct testimony in filed in these cases on June 8, 2022.

1 **Q. Did you change any of your recommendations as you created these exemplar**
2 **tariff sheets?**

3 A. No. However, application of the recommendation was different than I proposed in
4 my revenue requirement testimony as I dove into the current FAC tariff sheets. For
5 example, I proposed, to assure that the cost of energy for research and development
6 projects is not included in Evergy's FAC, a change to the following definition of PP:

- 7 1. Costs and revenues for purchased power reflected in FERC
8 Account 555, excluding all charges under Southwest Power Pool
9 ("SPP") Schedules 1a and 12. Such costs include:

10 This language is not included in Evergy's FAC tariff sheets. Instead I propose
11 changes in the Evergy Metro's FAC tariff sheets with my proposed changes
12 underlined:

13 Subaccount 555000: purchased power costs, energy charges from capacity
14 purchases of any duration, insurance recoveries, and subrogation recoveries
15 for purchased power expenses, broker commissions and fees (fees charged
16 by an agent, or agent's company to facilitate transactions between buyers
17 and sellers), charges and credits related to the Southwest Power Pool
18 ("SPP") Integrated Marketplace ("IM") or other IMs, including energy,
19 revenue neutrality, make whole and out of merit payments and distributions,
20 over collected losses payments and distributions, Transmission Congestion
21 Rights ("TCR") and Auction Revenue Rights ("ARR") settlements, virtual
22 energy costs, revenues and related fees where the virtual energy transaction
23 is a hedge in support of physical operations related to a generating resource
24 or load, load/export charges, ancillary services including non-performance
25 and distribution payments and charges and other miscellaneous SPP
26 Integrated Market charges including uplift charges or credits, excluding (1)
27 all charges under SPP Schedules 1a and 12, and (2) amounts associated with
28 energy purchased from the SPP market to serve research and development
29 projects of the Company, (3) the amounts associated with purchased power
30 agreements associated with the Renewable Energy Rider tariff and (4) the
31 Missouri allocated portion of the difference between the amount of the
32 bilateral contract for hydro energy purchased from CNPPID and the average
33 monthly LMP value at the CNPPID nodes times the amount of energy sold
34 to the SPP at the CNPPID nodes. The CNPPID nodes are defined as

1 NPPD.KCPL.JFY1, NPPD.KCPL.JFY2, NPPD.KCPL.JHN1,
2 NPPD.KCPL.JN11, NPPD.KCPL.JN12;

3 And I propose the following change in the Evergy West’s FAC tariff sheets with
4 my proposed changes underlined:

5 Subaccount 555000: purchased power costs, energy charges from capacity
6 purchases, insurance recoveries, and subrogation recoveries for purchased
7 power expenses, broker commissions and fees (fees charged by an agent, or
8 agent's company to facilitate transactions between buyers and sellers), and
9 charges and credits related to the Southwest Power Pool (“SPP”) Integrated
10 Marketplace (“IM”) or other IMs, excluding (1) all charges under SPP
11 Schedules 1a and 12, and (2) amounts associated with energy purchased
12 from the SPP market to serve research and development projects of the
13 Company, (3) the amounts associated with purchased power agreements
14 associated with the Renewable Energy Rider tariff.

15 The concept is the same, the application is just different than what I proposed in my
16 revenue requirement testimony.

17 **Q. Are there any changes that you did not include in your revenue requirement**
18 **testimony?**

19 A. Yes. However, these are changes in the tariff sheets not changes in Evergy’s FAC.

20 **Q. Would you briefly explain the additional changes?**

21 A. The most significant change, which I’m proposing be made to both Evergy Metro and
22 Evergy West, is the deletion of the explanation for the procedure if the Southwest
23 Power Pool changes the designation of one of the schedules shown on the tariff sheets.
24 It is not necessary to include this in the tariff sheets anymore since the Commission
25 revised its FAC rule to include that procedure.

26 I made other small clean up suggestions such as including the words “Missouri
27 jurisdictional” in the definition of forecasted recovery period sales (SRP) and defining
28 SPP the first time it is used as the Southwest Power Pool.

29 All the changes are identified in the Schedules with additions and deletions
30 shown with track changes.

1 | **Q. Does this conclude your direct testimony?**

2 | A. Yes.