

# Exhibit No. 101

Staff – Exhibit 101  
Byron M. Murray  
Rebuttal Testimony  
File No. EU-2020-0350  
Aug. 17, 2020

*Exhibit No.:* 101  
*Issues:* *Cost for Deferral Under AAO*  
*Witness:* *Byron M. Murray*  
*Sponsoring Party:* *MO PSC Staff*  
*Type of Exhibit:* *Rebuttal Testimony*  
*Case No.:* *EU-2020-0350*  
*Date Testimony Prepared:* *August 17, 2020*

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**TARIFF/DESIGN DEPARTMENT**

**REBUTTAL TESTIMONY**

**OF**

**BYRON M. MURRAY**

**EVERGY METRO, INC., d/b/a EVERGY MISSOURI METRO and  
EVERGY MISSOURI WEST, INC., d/b/a EVERGY MISSOURI WEST**

**CASE NO. EU-2020-0350**

*Jefferson City, Missouri*  
*August 2020*

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **BYRON M. MURRAY**

4 **EVERGY METRO, INC., d/b/a EVERGY MISSOURI METRO and**  
5 **EVERGY MISSOURI WEST, INC., d/b/a EVERGY MISSOURI WEST**  
6 **CASE NO. EU-2020-0350**

7 **I. INTRODUCTION**

8 Q. Please state your name and business address.

9 A. My name is Byron M. Murray. My business address is 200 Madison St.,  
10 Jefferson City, MO 65110.

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

12 A. I am employed by the Missouri Public Service Commission  
13 (“Commission”) as an Economist in the Tariff & Rate Design Department of the Industry  
14 Analysis Division.

15 Q. Please describe your educational and work background?

16 A. Please see Schedule BMM-d1

17 Q. What is the purpose of your rebuttal testimony in this proceeding?

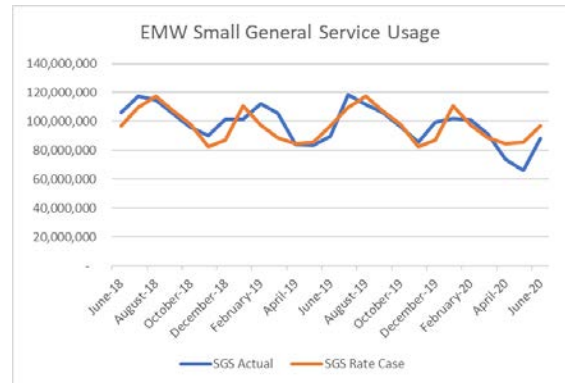
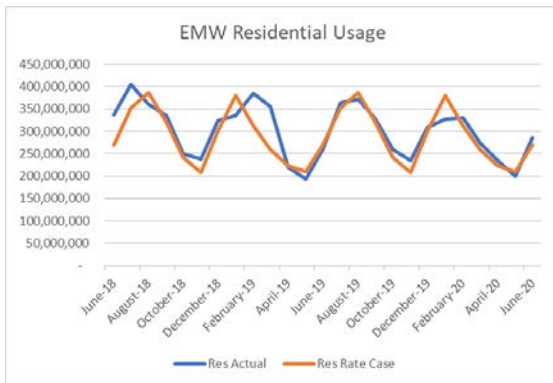
18 A. The purpose of my rebuttal testimony is to address the Evergy Missouri  
19 Metro and Evergy Missouri West (combined, “Company” or “Evergy”) application for an  
20 Accounting Authority Order (AAO) regarding extraordinary usage degradation due to the  
21 COVID-19 pandemic.

1 **II. HISTORICAL DATA COMPARISON**

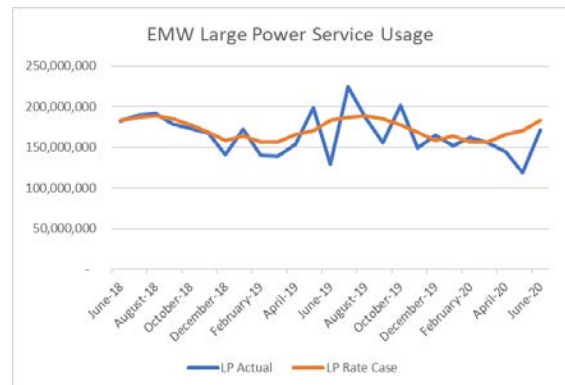
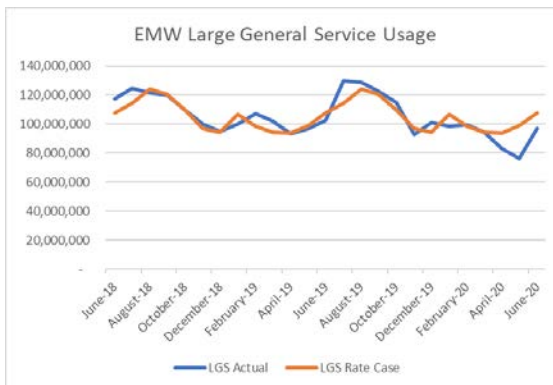
2 Q. Please describe Staff’s review of the Companies’ recent historical usage  
3 data.

4 A. Staff compared actual usage over a two year period to the usage by rate class  
5 settled upon from Evergy’s last general rate case. The graphs below compare actual  
6 monthly usage<sup>1</sup> to the monthly usage determined in Evergy’s last general rate cases for  
7 Evergy Missouri West (EMW) and Evergy Missouri Metro (EMM).

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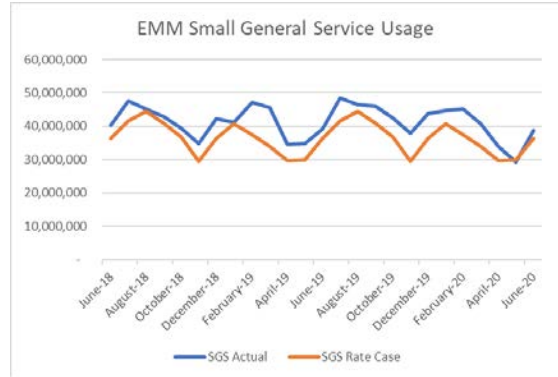
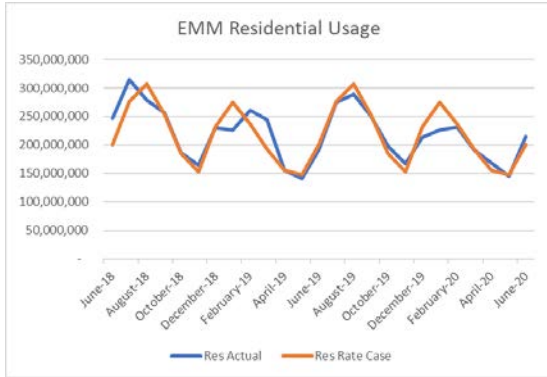
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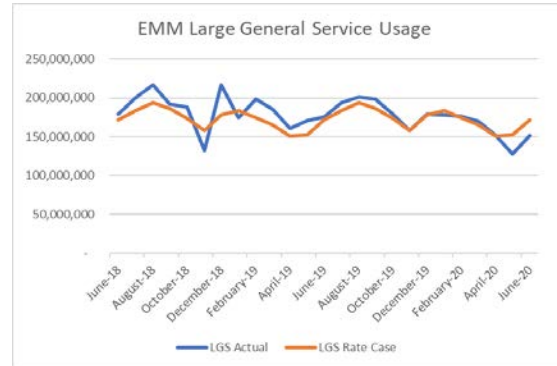
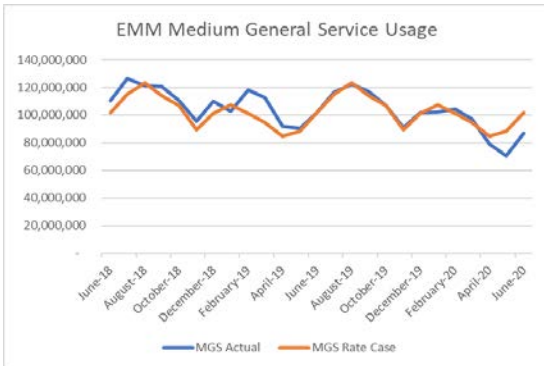
<sup>1</sup> The actual monthly usage is not weather normalized.

Rebuttal Testimony of  
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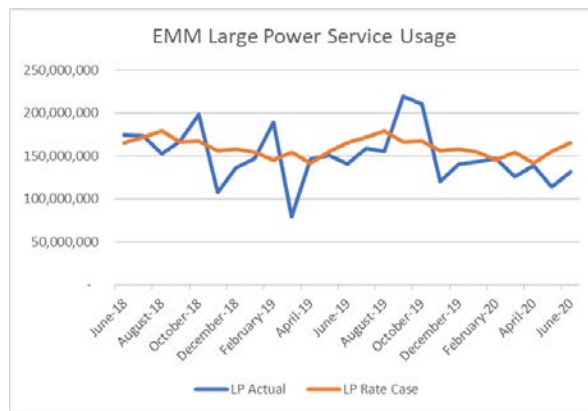
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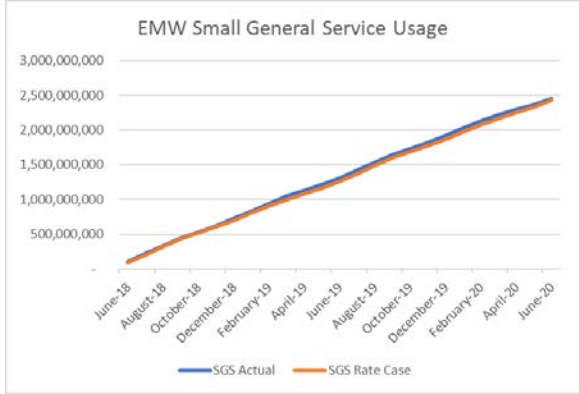
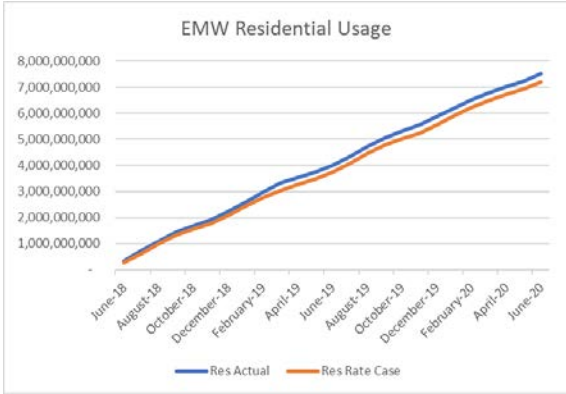
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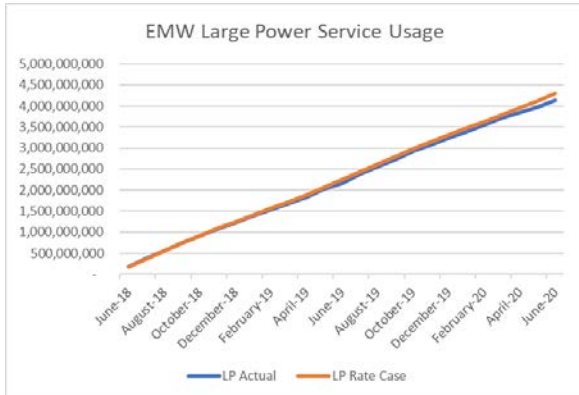
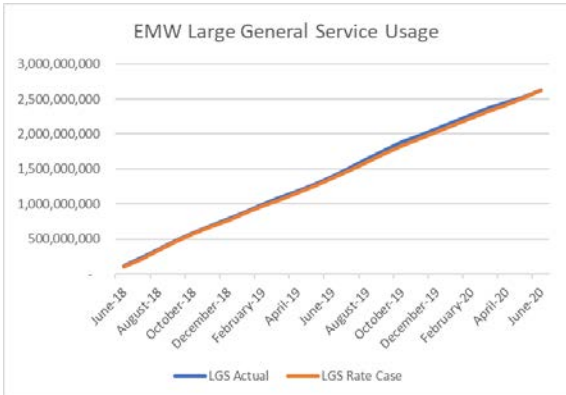
However, the graphs below are showing the same comparison as above except cumulative monthly usage over the time period per each rate class is used.

Rebuttal Testimony of  
Byron M. Murray

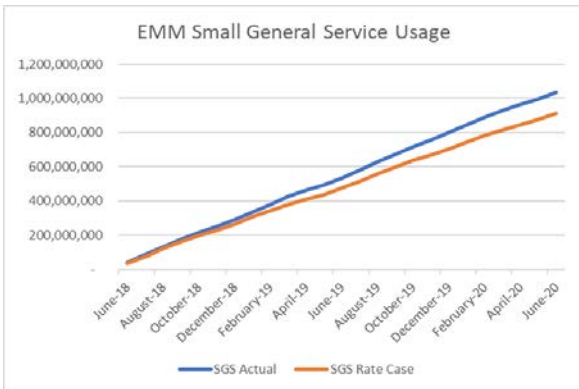
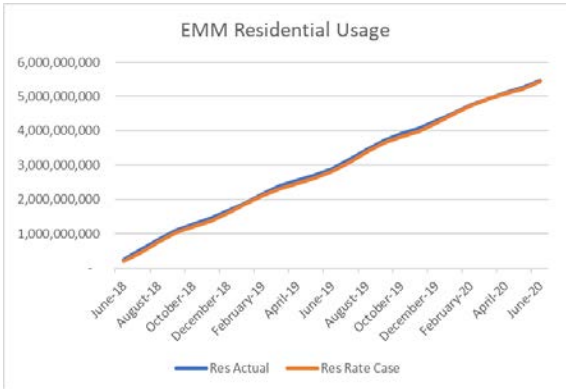
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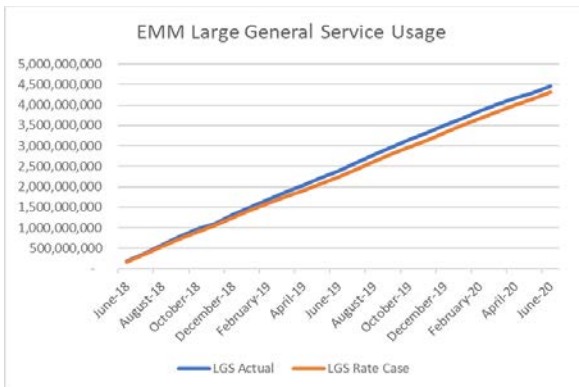
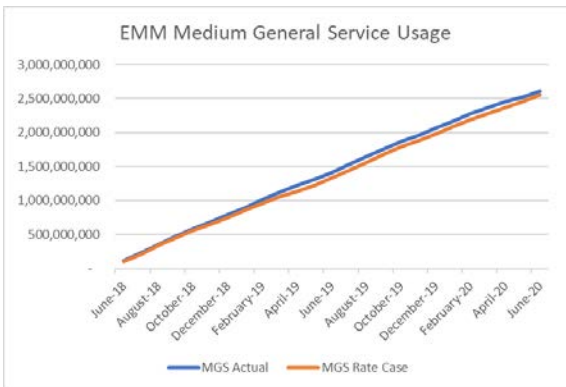
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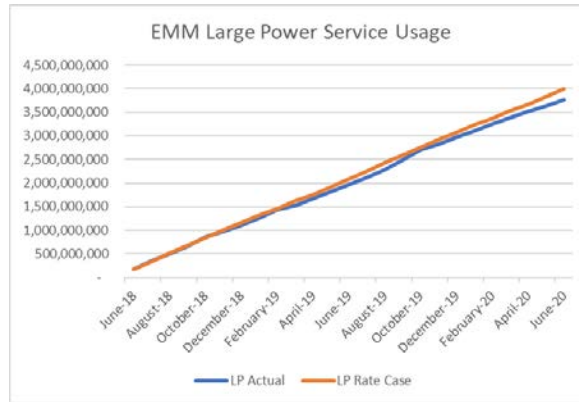
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Rebuttal Testimony of  
Byron M. Murray



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Q. What does Staff’s analysis show?

A. The graphs above show that, over time, the monthly differences that exist between the Companies’ rate case usage and actual billed usage average out and are similar to or higher than the usage approved in Evergy’s last rate cases for all rate classes except for the Large Power class.<sup>2</sup>

Q. Does this complete your rebuttal testimony?

A. Yes it does.

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<sup>2</sup> Staff did not include a graph for the Special Contract class which had approximately 12,000 MWh or 12,000,000 kWh more per month than what was reflected in the Evergy West’s last rate case.

**BEFORE THE PUBLIC SERVICE COMMISSION**  
**OF THE STATE OF MISSOURI**

In the Matter of the Application of Evergy )  
Metro, Inc. d/b/a Evergy Missouri Metro ) Case No. EU-2020-0350  
and Evergy Missouri West, Inc. d/b/a Evergy )  
Missouri West for an Accounting Authority )  
Order Allowing the Companies to Record )  
and Preserve Costs Related to COVID-19 )  
Expenses )

**AFFIDAVIT OF BYRON M. MURRAY**

STATE OF MISSOURI        )  
                                      )        ss.  
COUNTY OF COLE         )

**COME NOW BYRON M. MURRAY** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of Byron M. Murray*; and that the same is true and correct according to his best knowledge and belief, under penalty of perjury.

Further the Affiants sayeth not.

/s/Byron M. Murray  
**BYRON M. MURRAY**



## **BYRON M. MURRAY CREDENTIALS**

### **PRESENT POSITION**

I am currently employed as an Economist in the Tariff/Rate Design Department within the Industry Analysis Division of the Missouri Public Service Commission. I have been employed at the Missouri Public Service Commission since October 2013.

### **EDUCATION**

I received my Bachelor of Science in Agricultural Business from Lincoln University in Jefferson City, MO in May 1997. I completed my Master of Public Administration from the University of Missouri – Columbia in Columbia, MO in May 2004.

### **EMPLOYMENT BACKGROUND**

Prior to joining the Commission, I worked as an Energy Planner II for the Division of Energy, Department of Natural Resources. I was a Unit Chief/Fiscal and Administrative Manager, in the Water Protection Program of the Department of Natural Resources, responsible for the management of drinking water and waste water permit fee collections. I also worked as a Management Analyst Specialist II in the Administration Division and the Solid Waste Management Program of the Department of Natural Resources. I was employed as a Planner II/State Project Manager for the Scrap Tire Unit in the Solid Waste Management Program of the Department of Natural Resources. I have approximately 32 years of professional regulatory enforcement experience with the State of Missouri.

This will be my eighth participation in a rate case before the commission. Please see the table below of case proceedings:

<b>Case Number</b>	<b>Company Name</b>	<b>Testimony Type</b>	<b>Type of Case</b>	<b>Issue</b>
<b>ER-2014-0370</b>	KCP&L	Direct/Rebuttal/S urrebuttal	Electric Rate Case	Tariff/Rate Design
<b>ET-2016-0246</b>	Ameren Missouri	Rebuttal	Electric Vehicle Tariff	Tariff/Rate Design for Electric Vehicle Charging Station Network
<b>ER-2016-0179</b>	Ameren Missouri	Rebuttal	Electric Rate Case	Tariff/Rate Design for Electric Vehicle Charging Stations

<b>Case Number</b>	<b>Company Name</b>	<b>Testimony Type</b>	<b>Type of Case</b>	<b>Issue</b>
<b>ER-2019-0335</b>	Ameren Missouri	Rebuttal	Electric Rate Case	Paperless Billing
<b>ER-2018-0145</b>	KCP&L	Direct/Rebuttal	Electric Rate Case	EV Charging Station Network
<b>EW-2016-0123</b>	Electric Vehicle Working Docket	Staff Report	Working Group	Tariff/Rate Design Electric Vehicle Charging Station
<b>ER-2016-0285</b>	KCP&L	Rebuttal	Electric Rate Case	Tariff/Rate Design Electric Charging TOU Rates for EV Charging Station Network
<b>ER-2018-0145 / 0146</b>	KCP&L/GMO	Rebuttal	Electric Rate Case	Tariff / Rate Design for Electric Vehicle
<b>ER-2019-0374</b>	Empire Electric District	Rebuttal	Electric Rate Case	Large Power Class Analysis
<b>EW-2016-0313</b>	A Working Case To Consider Policies To Improve Electric Utility Regulation	Staff Report	Working Group	Tariff / Rate Design to improve regulation
<b>EW-2017-0245</b>	A Working Case To Explore Emerging Issues in Utility Regulation: Smart Non-Residential Rate Design	Staff Report	Working Group	Electric Vehicle Infrastructure
<b>EW-2019-0229</b>	EV Charging Station Workshop	Staff Report	Working Group	EV Charging Station Infrastructure Development
<b>ET-2018-0132</b>	Ameren Missouri	Rebuttal /Surrebuttal	EV Tariff	Tariff / Rate Design for Electric Vehicle

<b>Case Number</b>	<b>Company Name</b>	<b>Testimony Type</b>	<b>Type of Case</b>	<b>Issue</b>
<b>ET-2018-0090</b>	KCP&L/GMO	Staff Recommendation	RESRAM	Tariff Revision
<b>ET-2019-0092</b>	KCP&L/GMO	Staff Recommendation	RESRAM	Tariff Revision
<b>EU-2020-0350</b>	Evergy Metro and Evergy Missouri	Rebuttal	AAO	Revenue and Arrears Analysis
<b>JE-2018-0060</b>	Ameren Missouri	Staff Recommendation	Pure Power Program Extension	Demand-Side Pilot Project Extension
<b>JE-2019-0107</b>	Ameren Missouri	Staff Recommendation	Voluntary Green Program	Pure Power Program
<b>JE-2019-0156</b>	Ameren Missouri	Staff Recommendation	Voluntary Green Program	Pure Power Program
<b>JE-2020-0077</b>	Ameren Missouri	Staff Recommendation	Voluntary Green Program	Pure Power Program
<b>JE-2020-0202</b>	Ameren Missouri	Staff Recommendation	Voluntary Green Program	Pure Power Program Extension
<b>GA-2017-0016</b>	Summit Natural Gas of Missouri	Staff Recommendation	CCN Application	Compliance Tariff Filing Recommendation
<b>GA-2018-0220</b>	Summit Natural Gas of Missouri	Staff Report and Recommendation	CCN Application	CCN Application
<b>GA-2019-0210</b>	Spire Natural Gas	Staff Recommendation	CCN Application	Compliance Tariff Recommendation
<b>GA-2019-0214</b>	Spire Natural Gas	Staff Recommendation	CCN Application	Compliance Tariff Recommendation
<b>GA-2019-0226</b>	Spire Natural Gas	Staff Recommendation	CCN Application	CCN Application - Expedited
<b>GA-2020-0236</b>	Spire National Gas	Staff Recommendation	CNN Application	Compliance Tariff Recommendation

<b>Case Number</b>	<b>Company Name</b>	<b>Testimony Type</b>	<b>Type of Case</b>	<b>Issue</b>
<b>GR-2016-0099</b>	The Empire Electric District – Gas	Staff Recommendation	Winter PGA	Scheduled Winter PGA ACA
<b>HN-2020-0205</b>	Veolia Energy Kansas City	Staff Recommendation	Name Change Application	Adoption Notice Tariff Sheets