

# Exhibit No. 102

PSC Staff – Exhibit 102  
Jordan T. Hull  
Rebuttal Testimony  
File No. EA-2022-0328

*Exhibit No.:*  
*Issue(s):* *Certificates of  
Convenience/Feasibility  
Analysis*  
*Witness:* *Jordan T. Hull*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Rebuttal Testimony*  
*Case No.:* *EA-2022-0328*  
*Date Testimony Prepared:* *January 17, 2023*

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**ENERGY RESOURCES DEPARTMENT**

**REBUTTAL TESTIMONY**

**OF**

**JORDAN T. HULL**

**EVERGY MISSOURI WEST, INC.  
d/b/a Evergy Missouri West**

**CASE NO. EA-2022-0328**

*Jefferson City, Missouri  
January 2023*

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **JORDAN T. HULL**

4 **EVERGY MISSOURI WEST, INC.**

5 **d/b/a Evergy Missouri West**

6 **CASE NO. EA-2022-0328**

7 Q. Please state your name and business address.

8 A. My name is Jordan T. Hull, and my business address is Missouri Public Service  
9 Commission; 200 Madison Street, PO Box 360; Jefferson City, MO 65102-0360

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

11 A. I am employed by the Missouri Public Service Commission as an Associate  
12 Engineer in the Energy Resources Department in the Industry Analysis Division.

13 Q. Please describe your educational and work background.

14 A. Please See Schedule JTH-r1.

15 Q. Purpose of your testimony?

16 A. The purpose of my rebuttal testimony is to discuss the application of  
17 Evergy Missouri West to provide more information to the commission about whether  
18 Evergy Missouri West is qualified to qualified to, own, operate, maintain, and otherwise control  
19 and manage the project.

20 Q. Is Evergy Missouri West a Missouri investor owned utility (IOU)?

21 A. Evergy Missouri West is a Missouri IOU regulated by Missouri Public Service  
22 Commission with affiliates including Evergy Missouri Metro, Evergy Kansas Metro, and  
23 Evergy Kansas Central.

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1 Q. Does Evergy Missouri West have experience with operating and maintaining  
2 wind generation?

3 A. Evergy Missouri West does not directly own or operate wind generating  
4 facilities today.

5 Q. Do any of Evergy Missouri West's affiliates have experience with operating and  
6 maintaining wind generation?

7 A. Evergy affiliated utilities own and operate the following wind farms.

- 8 ○ Evergy Metro (Spearville I – 101 MW, Spearville II – 48 MW)
- 9 ○ Evergy Kansas Central (Central Plains-99 MW)

10 Q. Who will provide vegetation control and maintenance for this project including  
11 the 3 mile interconnection line?

12 A. Based on a Data Request (DR) response received by Staff, “Evergy will be  
13 responsible for the vegetation control and maintenance where required. However, this is mostly  
14 grazing land on the turbine leases. Very little vegetation control is anticipated at the site outside  
15 of collector substations and under the generator interconnection line.”<sup>1</sup>

16 Q. What is the emergency plan associated with this project?

17 A. Based on a DR response received by Staff, “The Persimmon Creek site will be  
18 remotely monitored 24/7 by Evergy's Generation System Operators (GSO). In the event of an  
19 unplanned or forced outage of the asset, the operators will receive an alarm notifying them of the  
20 outage. After evaluating the cause of the alarm, the GSO's will attempt to remotely reset and

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<sup>1</sup> Data request 0048 from EA-2022-0328.

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1 restart the asset if it is deemed safe to do so, or they will dispatch a local technician to the site for  
2 further troubleshooting.”<sup>2</sup>

3 Q. Is Evergy Missouri West qualified to execute the scope of this project?

4 A. Yes, based on Evergy Missouri West being able to utilize expertise and knowledge  
5 from its affiliated jurisdictions, Staff concludes that Evergy Missouri West is qualified to own,  
6 operate, maintain, and otherwise control and manage the project.

7 Q. Does this conclude your rebuttal testimony?

8 A. Yes.

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<sup>2</sup> Data request 0048 from EA-2022-0328.



**Jordan T. Hull**

**CURRENT POSITION:**

I am currently an Associate Engineer in the Energy Resources Department, Industry Analysis Division, of the Missouri Public Service Commission.

**EDUCATIONAL BACKGROUND & WORK EXPERIENCE:**

I received my Bachelor of Science Degree in Biological Engineering from the University of Missouri-Columbia in May of 2016. In June of 2016 I began employment with the Missouri Department of Natural Resources in the Air Pollution Control Program as an Environmental Engineer I. In June of 2017, I was promoted to an Environmental Engineer II within the Air Pollution Control Program. I began employment with the commission in November of 2018.

**Summary of Case Involvement:**

<b>Case Number</b>	<b>Utility</b>	<b>Type</b>	<b>Issues</b>
EO-2019-0067	KCP&L GMO	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2019-0068	KCP&L	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2019-0049	Liberty-Empire Electric Company	Integrated Resource Plan	Misc.
EO-2019-0132 & EO-2019-0133	KCP&L	MEEIA	Misc.
EO-2019-0257	Ameren- Missouri	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
ER-2019-0335	Ameren- Missouri	Rate Case	Heat Rates
ER-2019-0374	Liberty-Empire Electric Company	Rate Case	Heat Rates
EO-2020-0059	Liberty-Empire Electric Company	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2020-0262	EvergyWest	FAC Prudency Review	Heat Rates, Plant Outages, Generation

			Utilization, Self-Commitment.
EO-2020-0263	Evergy Metro	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0060	Ameren- Missouri	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0021	Ameren- Missouri	Integrated Resource Plan	Misc.
EO-2021-0281	Liberty- Empire	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0035	Evergy- Metro	Integrated Resource Plan	Misc.
EO-2021-0036	Evergy- West	Integrated Resource Plan	Misc.
EO-2021-0060	Ameren- Missouri	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
ER-2021-0240	Ameren- Missouri	Rate Case	Heat Rate
ER-2021-0312	Liberty- Empire	Rate Case	Heat Rate
EO-2021-0331	Liberty Empire	Integrated Resource Plan	Misc.
EA-2022-0099	Ameren- Missouri	Transmission	Qualified to construct
EO-2022-0337	Ameren- Missouri	Rate case	Heat Rate
EO-2022-0245	Ameren- Missouri	Transmission	Qualified to construct
EO-2023-0087	Liberty- Empire	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment