Exhibit No.:	
Issues:	*Directory of Staff witnesses; Past MEEIA Cycles; 2023 IRP preferred resource plan; EO in fourth MEEIA cycle;*
Witness:	*Brad J. Fortson*
Sponsoring Party:	*MoPSC Staff*
Type of Exhibit:	*Direct Testimony*
Case No.:	*EO-2023-0136*
Date Testimony Prepared:	*March 1, 2024*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

DIRECT TESTIMONY

OF

BRAD J. FORTSON

UNION ELECTRIC COMPANY
d/b/a AMEREN MISSOURI

CASE NO. EO-2023-0136

Jefferson City, Missouri
March, 2024

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DIRECT TESTIMONY

OF

BRAD J. FORTSON

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d/b/a AMEREN MISSOURI
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DIRECT TESTIMONY

OF

BRAD J. FORTSON

UNION ELECTRIC COMPANY
d/b/a AMEREN MISSOURI
CASE NO. EO-2023-0136

Q. Please state your name and business address.

A. My name is Brad J. Fortson, and my business address is Missouri Public Service Commission, 200 Madison Street, PO Box 360, Jefferson City, MO 65102.

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

A. I am employed by the Missouri Public Service Commission ("Commission") as the Regulatory Compliance Manager of the Energy Resources Department.

Q. Please describe your educational background and work experience.

A. Please refer to the attached Schedule BJF-d1.

Q. Have you previously filed testimony before this Commission?

A. Yes. Please also refer to the attached Schedule BJF-d1 for a list of cases in which I have previously led or participated in.

EXECUTIVE SUMMARY

Q. What is the purpose of your direct testimony?

A. My direct testimony will discuss (1) a directory of Staff witnesses and their issues in their direct testimonies in this case, (2) Evidence available to the Commission in prior Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") Missouri Energy Efficiency Investment Act ("MEEIA") cycles, (3) 2023 Integrated Resource Plan ("IRP") preferred resource plan, and (4) earnings opportunity ("EO") in fourth MEEIA cycle.

Q. What is the overall purpose of Staff's direct testimony?

A. Staff's overall position in its direct testimony is that it is not reasonable at this time for the Commission to approve a MEEIA program portfolio and its extraordinary ratemaking authority. Staff's direct testimony in this case outlines concerns with the ability to design a MEEIA portfolio that complies with statutory requirements at this time, and provides recommendations for a process to execute if the Commission directs the parties to proceed with a MEEIA portfolio at this time.[1]

Q. Why is Staff taking this approach to MEEIA at this time?

A. As further detailed throughout mine and other Staff witnesses' direct testimony in this case, conditions surrounding MEEIA, and the entire electric industry as a whole, have changed, and to date, analysis does not support that ratepayers break even or benefit from a MEEIA cycle 4 at this time. In fact, changing conditions have been a major contributing factor to the 2022, 2023, and 2024 one-year MEEIA extensions as opposed to the multiyear MEEIA portfolios previously approved. Ameren Missouri has now had nearly twelve years of MEEIA programs. The Federal Government has and continues to influence the energy efficiency market through tax incentives, and there has and continues to be state and federal loans and grants, including the recent passage of the Inflation Reduction Act ("IRA"), all of which also provide no shortage of work for contractors. Federal Energy Independence and Security Act ("EISA") energy efficiency baselines continue to increase. Low-hanging fruit like lighting and home energy report programs have ran their course. Naturally occurring energy efficiency, building code standards, and appliance efficiency inherently increase with time. Ameren Missouri's energy and capacity position has changed due to the Midcontinent

[1] My testimony discusses Earnings Opportunity development, Ms. Lange's testimony discusses avoided revenue mechanism development, Mr. Luebbert's testimony discusses program design as an iterative process related to avoided cost and earnings opportunity quantifications.

Independent System Operator's ("MISO") capacity requirements, MISO's planning resource auction seasonality, and the early retirement of the Rush Island Energy Center due to a federal court ruling that Ameren Missouri violated the Clean Air Act. There are also a number of issues with Ameren Missouri's current demand-side programs investment mechanism ("DSIM") that will be addressed in Staff's direct testimony as well.

STAFF WITNESSES AND ISSUES

Q. How is Staff's direct testimony organized?

A. My direct testimony will describe an overview of Staff's position, Ms. Lange's direct testimony will provide an overview of MEEIA and the MEEIA statute, Mr. Luebbert's direct testimony will provide a more detailed discussion of the complications and interactions of the actual operation of MEEIA and the development of a MEEIA portfolio that complies with statutory requirements, in particular, the requirement that a MEEIA portfolio is beneficial to all customers in the customer class in which the programs are proposed regardless of whether the programs are utilized by all customers.

Table 1, below, provides additional specificity concerning Staff's witnesses and the issues they address.

Table 1: Staff witness and issues	
Witness Name	**Issues**
Brad J. Fortson	Conditions surrounding MEEIA; Directory of Staff witnesses; Past MEEIA Cycles; 2023 IRP preferred resource plan; Earnings Opportunity for fourth MEEIA cycle; the need for accurate, independent EM&V
Sarah L.K. Lange	Overview of MEEIA; MEEIA enabling statute; Avoided revenue mechanism if a fourth MEEIA cycle is authorized;
J Luebbert	Avoided Costs and avoided Earnings Opportunity; Additional context for MEEIA complications; Designing a MEEIA compliant portfolio
Justin Tevie	Importance of accurate energy and demand savings estimates
Mark Kiesling	Energy Independence and Security Act standards; Other sources for energy efficiency funding
Marina Stever	MEEIA cost recovery to date; Rider EEIC filing timing
Jordan Hull	ARCs and BDR budgets; Changes in MISO PRA
Amy Eichholz	Low-income program tariffs; Residential low-income program design; low-income federal assistance; Low-income non-MEEIA programs
Hari Poudel	Throughput Disincentive; Evaluation, Measurement & Verification; Rebound effect; Rate case annualization

<u>EVIDENCE AVAILABLE TO THE COMMISSION IN PRIOR MEEIA CYCLES</u>

Q. Has the Commission previously authorized MEEIA Cycles for Ameren Missouri?

A. Yes. On January 20, 2012, Ameren Missouri filed its *Application to Approve DSIM Filing, Request for Variances and Motion to Adopt Procedural Schedule* and its *2013 – 2015 Energy Efficiency Plan* ("MEEIA Cycle 1") in Case No. EO-2012-0142. This case ultimately settled, and on August 1, 2012, the Commission approved the *Unanimous Stipulation and Agreement Resolving Ameren Missouri's MEEIA Filing.*

On December 22, 2014, Ameren Missouri filed its *Application to Approve DSIM Filing, Request for Variances and Motion to Adopt Procedural Schedule* and its *Ameren Missouri Energy Efficiency Plan 2016 – 2018* ("MEEIA Cycle 2") in Case No. EO-2015-0055. An October 22, 2015, Commission *Report and Order* rejected Ameren Missouri's MEEIA Cycle 2 filing, but as a part of the order the Commission encouraged Ameren Missouri to consider the Commission's decision and to present a new MEEIA plan that all parties and the Commission could support. Ameren Missouri proposed a new plan, and on February 10, 2016, the Commission approved the *Non-Unanimous Stipulation and Agreement and Tariff Revision*.

On June 4, 2018, Ameren Missouri filed its *Application To Approve DSIM And Demand-Side Management Portfolio And Plan, Request For Variances, And Motion To Adopt Procedural Schedule* ("MEEIA Cycle 3") in Case No. EO-2018-0211. This case ultimately settled, and on December 5, 2018, the Commission approved the *Stipulation and Agreement*. The parties agreed to a 3-year plan from 2019 – 2021.[2] Since then, the parties have agreed, and the Commission has approved, three subsequent 1-year extensions for 2022, 2023, and 2024.

Q. What program budgets were agreed to through the settlements of the previous MEEIA cycles?

[2] The low-income programs were approved for six years (2019 – 2024).

A. For MEEIA Cycle 1, a program budget of approximately $147.3 million, for MEEIA Cycle 2, a program budget of approximately $158 million, and for MEEIA Cycle 3, a program budget of approximately $448,220,000 (includes the years 2019 – 2024), for a combined total of approximately $753,520,000 (2013 – 2024).[3]

Q. What net benefits have been achieved through the Ameren MEEIA Cycles to date?

A. That is hard to say, because the calculation of net benefits is very subjective, based on assumptions, and it has never been verified that the benefits ever really happened.

Q. Please explain.

A. The independence of EM&V is crucial to identifying net benefits achieved in a MEEIA cycle. 20 CSR 4240-20.093(8) states in part that "The utility shall provide oversight and guidance to the independent EM&V contractor, but shall not influence the independent EM&V contractor's report(s)." It is hard, if not impossible, for EM&V to not be influenced by the utility when the utility is providing most of the inputs the EM&V contractor is relying on for final EM&V results.

In developing prior MEEIA cycles, the benefits used as a part of the cost-effectiveness calculation are the energy and demand savings multiplied by the avoided energy, capacity, and transmission and distribution costs ("avoided costs") based on deemed energy and demand savings values for each measure in Ameren Missouri's MEEIA portfolio.[4]

[3] Staff witness Marina Stever includes in her direct testimony the amount of program costs recovered by Ameren Missouri to date.
[4] The total number of measures purchased (or given away) are multiplied by each measures deemed energy and demand savings.

Q. To what extent has the Commission had an opportunity to determine whether those benefits truly materialized?

A. There is an EM&V process, but that process to date has relied on several assumptions, and the verification has occurred for a relatively small sample size of measures. Further, after final EM&V reports are filed for any given program year, there is not a process in place to ensure those evaluated savings actually occurred as they were deemed to have. For example, MEEIA Cycle 1 savings targets heavily relied on compact fluorescent lamps ("CFLs"). If you assume a 9-year useful life like Ameren Missouri did, CFLs installed in 2015 (the final year of MEEIA Cycle 1) would have lasted until 2023. Due to potential CFL concerns (e.g. contain mercury and disposal of broken or burned-out CFLs) and the prominence of LED light bulbs (e.g. more efficient than CFLs), we know that all CFLs installed in 2015 did not last until 2023. However, Ameren Missouri has been compensated for the persistence of savings that were assumed for the 9-year deemed savings of CFLs.

The energy and demand savings results of the EM&V are then multiplied by the avoided costs that were considered earlier during program design.

Q. Has the Commission had an opportunity to review whether or not the statutory requirement that a MEEIA portfolio is beneficial to all customers in the customer class in which the programs are proposed regardless of whether the programs are utilized by all customers had been in fact met for prior MEEIA cycles?

A. Not to date. Per 20 CSR 4240-20.092(1)(C) "Avoided costs or avoided utility costs means the cost savings obtained by substituting demand-side programs for existing and new supply-side resources…" However, as discussed by Mr. Luebbert, avoided energy costs are flown through the Ameren Missouri FAC, and avoided capacity costs may or may not materialize, particularly if renewable energy products with low variable costs are the avoided supply-side resource.

<u>2023 IRP PREFERRED RESOURCE PLAN</u>

Q. Can you highlight Ameren Missouri's preferred resource plan from its 2023 integrated resource plan filed in Case No. EO-2024-0020?

A. Yes. Ameren Missouri's preferred resource plan includes the following:

- 2,800 MWs of new wind and solar generation by 2030, representing an investment of approximately $5-6 billion.
- 2,600 MWs of new wind and solar generation after 2030, bringing the total new wind and solar generation to 5,400 MWs.
- Retirement of all of Ameren Missouri's coal-fired generating capacity by 2042. (This includes the early retirement of the Rush Island Energy Center by the end of 2024 due to a federal court ruling that Ameren Missouri violated the Clean Air Act.)
- 800 MWs of simple cycle gas-fired combustion turbine generators by 2027.[5]
- 1,200 MWs of gas-fired combined cycle generation by 2032.
- 1,200 MWs of as-yet-unspecified clean dispatchable generation in each of 2040 and 2043.
- Electrification of transportation and other sectors.

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[5] On February 27, 2024, Ameren Missouri filed its *Notice of Case Filing,* giving notice that it will file an application for a CCN to construct a simple cycle natural gas generation facility.

- Continued replacement of aging distribution infrastructure and the development and deployment of smart grid, communications, and other advanced technologies on the distribution system, along with investments in transmission infrastructure.
- Continuation of energy efficiency and demand response programs.

Q. To be clear, even with the MEEIA energy and demand savings to date, and the inclusion of an energy efficiency and demand response portfolio included in its current preferred resource plan, Ameren Missouri is not only planning a 2,800 MW renewable generation buildout within the next six years, but also 800 MWs of dispatchable generation within the next four years and another 1,200 MWs of dispatchable generation within the next eight years. So after 12 years of MEEIA, what capacity costs are being avoided?

A. In Case No. EO-2024-0020, Staff submitted data request ("DR") 0002 asking, "What, if any, future supply-side generation will be deferred by the RAP[6] DSM[7] portfolio selected as part of Ameren Missouri's preferred resource plan in this case?" Ameren Missouri responded, "A comparison of Plan C (preferred plan with RAP DSM) and Plan I (same attributes as Plan C except for no additional DSM) demonstrates that RAP DSM helps avoid two additional 1200 MW combined cycle resources in 2028 and 2043."

Q. Can you simplify what Staff's DR was asking, and Ameren Missouri's response to Staff's DR?

A. Yes. Staff asked Ameren Missouri what generation facility investment(s) will be deferred (or avoided) with the inclusion of a certain level (RAP) of energy efficiency and

[6] Realistic Achievable Potential.
[7] Demand-Side Management.

demand response programs over the twenty-year planning period of the plan it chose as its preferred plan. Ameren Missouri responded that the twenty-year plan it chose as its preferred plan that included a certain level (RAP) of energy efficiency and demand response programs compared to the same twenty-year plan that did not include the same level (RAP) of energy efficiency and demand response programs would avoid Ameren Missouri needing to build two 1,200 MW combined cycle resources in 2028 and 2043.

Q. Based on past experience, is it reasonable to expect that a fourth MEEIA cycle will materially avoid or defer supply-side investments?

A. No. Under the preferred resource plan, Ameren Missouri is planning relatively near-term and long-term renewable buildout (2,800 MWs by 2030 and 2,600 MWs after 2030) coupled with non-renewable additions (800 MWs of simple cycle gas-fired combustion turbine generators by 2027, 1,200 MWs of gas-fired combined cycle generation by 2032, and 1,200 MWs of as-yet-unspecified clean dispatchable generation in each of 2040 and 2043). Ameren Missouri has aggressively promoted its lessened reliance on coal generation and expansion of renewable generation. Further, based on past experience, generation ratebase has grown under prior MEEIA cycles.

On October 25, 2011, in File No. EO-2012-0127, Ameren Missouri filed a notice of change in preferred plan. The new preferred plan

> …was reached as a result of the Commission's order in Case No. ER-2011-0028, in which Ameren Missouri's request for relief with respect to the throughput disincentive associated with implementation of energy efficiency was denied. As the Commission has clearly indicated that appropriate resolution for energy efficiency cost recovery issues is available through a filing by Ameren Missouri under the Missouri Energy Efficiency Investment Act (MEEIA), the Company has indicated its intention to make such a filing in the first quarter of 2012. In the interim, the Company cannot subject its investors to the

> increasing ongoing financial penalty they would incur without appropriate relief….

Q. What did the preferred plan include?

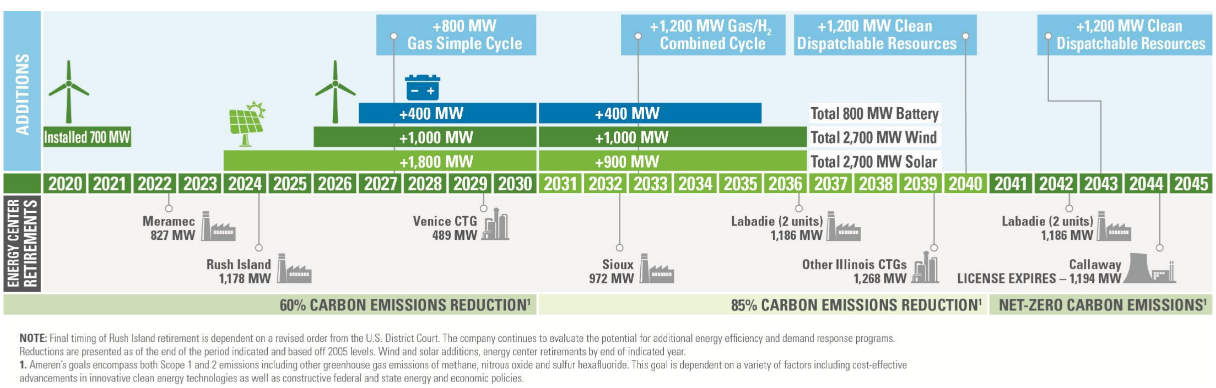
A. The EO-2012-0127 preferred resource plan reflected the addition of a new 600 MW combined cycle gas generator in 2029, and renewable resource additions to comply with the Missouri Renewable Energy Standard, as were described in EO-2011-0271.

Q. What renewable resource additions were contemplated in EO-2011-0271?

A. The preferred plan identified in EO-2011-0271 called for approximately 240 MW of wind resources and 10 MW of landfill gas to be added through 2030.

Q. What is Ameren Missouri's current preferred plan?

A. Ameren Missouri's current preferred plan is to install an 800 MW gas unit in 2027, a 1,200 MW gas unit in 2033, and to add 2,800 MW of renewables before 2030, and 1,900 MW of renewables through 2036.



Q. Have the retirements of Meramac and Rush Island benefited ratepayers by reducing revenue requirement?

A. No, because Ameren Missouri has replaced these low-cost resources with high-cost resources to meet it's "energy need."

Q. Has Ameren Missouri filed testimony emphasizing the value of Rush Island as meeting Ameren Missouri's "energy need?"

A. Yes. Ajay Arora, at page 13 – 14 of his direct testimony in File No. EA-2023-0286 includes the following exchange:

> Q. Please discuss the Company's need for energy resources and how the Solar Projects help fulfill that need.
>
> A. As discussed above, Ameren Missouri's coal facilities are reaching end of life, and three of the Company's four coal facilities will retire no later than 2030: the Meramec Energy Center retired at the end of 2022, the Rush Island Energy Center will retire by 2025, and the Sioux Energy Center will retire by 2030. As illustrated in Company witness Michels' Direct Testimony, these retirements are triggering a dramatic swing in the Company's energy position over the next few years, from its current and historical abundantly long position to having a shortage of energy starting in 2028 assuming normal generation and load. The shortage grows steadily thereafter. Specifically, even under normalized planning conditions, Ameren Missouri becomes short by approximately 1 million megawatt-hours ("MWhs") as early as 2028, by approximately 2 million MWhs by 2029, approximately 6 million by 2031 and approximately 14 million MWhs by 2037, if no new generation resources are added. In fact, the Company's supply of energy is barely above its needs even as early as 2026 and woefully below the energy buffer the Company has maintained historically to protect our customers from shortages in energy supply and/or exposure to market price spikes. Energy shortages in 2028 and 2029 could be increased by an additional 3 million MWhs with recognition of a high price on carbon emissions, which would also mean there is no excess energy at all by 2026. The renewable energy resources the Company plans to add through 2030 reduces this shortage. I should note that the Company's energy positions just discussed above are probably even tighter given that they do not yet account for the lower generation likely to result from the recent CSAPR modifications mentioned above.

Q. How does this relate to development of an Earnings Opportunity for a fourth MEEIA Cycle?

A. As discussed by Mr. Luebbert, the intent of the Earnings Opportunity as a component of a MEEIA mechanism should be to compensate shareholders for return not earned on investments not made. The EO should be designed to result in utility shareholders receiving compensation to approximate the present value of the earnings opportunity on capacity-related investments that they would receive if the utility did not facilitate DSM programs, all else being equal. The inclusion of an EO is to remove a disincentive for utility promotion of ratepayer-funded DSM programs. However, since Ameren Missouri began facilitating ratepayer-funded programs through MEEIA, Ameren Missouri has grown its gross and net ratebase related to generation capacity while reducing its MW of accredited capacity.

EARNINGS OPPORTUNITY IN FOURTH MEEIA CYCLE

Q. Should Ameren Missouri receive an EO if no opportunity for investment is being avoided or deferred due to its MEEIA programs?

A. No. Section 393.1075.3 RSMo states in part that, "In support of this policy, the commission shall: (3) Provide timely earnings opportunities associated with cost-effective measurable and verifiable efficiency savings." Section 393.1075.4 further states in part that, "Recovery for such programs shall not be permitted unless the programs… are beneficial to all customers in the customer class in which the programs are proposed, regardless of whether the programs are utilized by all customers." However, there are two separate issues requiring consideration: (1) are costs avoided sufficient to be beneficial to the relevant customers to authorize a MEEIA cycle, and (2) has an earnings opportunity been avoided for shareholders justifying inclusion of an EO mechanism in that MEEIA cycle.

Q. In order for all customers to benefit, MEEIA rates, offset by FAC impact, must be lower than the increase to general rates that would have occurred due to new supply-side investment. Is it possible to avoid costs without avoiding earnings opportunities?

A. Yes. To authorize a MEEIA cycle the Commission must conclude that program participants and non-participants (all customers) will benefit from such programs. Avoiding or deferring a supply-side investment(s) is a source of avoided costs that is also a source of an avoided earnings opportunity.

Q. Commission rule 20 CSR 4240-20.094(4)(C)4. states:

> (C) Demonstration of cost-effectiveness for each demand-side program and for the total of all demand-side programs of the utility. At a minimum, the electric utility shall provide all workpapers, with all models and spreadsheets provided as executable versions in native format with all links and formulas intact, and include:
>
> 4. The impacts from all demand-side programs included in the application on any postponement or new supply-side resources and the early retirement of existing supply-side resources, **including annual and net present value of any lost utility earnings related thereto**. [emphasis added]

Has Staff prepared this calculation for its direct testimony in this case?

A. No. This provision requires demonstration that the demand-side programs in **that** MEEIA application impacts any postponement or new supply-side resources and the early retirement of existing supply-side resources, including annual and net present value of any lost utility earnings (EO) related to **that** MEEIA application. Based on the preferred resource plan discussion above, any current or near-term MEEIA application is not expected to postpone or avoid the need for 800 MWs of simple cycle gas-fired combustion turbine generators by 2027. It would also then appear that previous MEEIA cycles had no impact in Ameren Missouri deferring or avoiding a gas-fired plant in 2027. As previously mentioned, on February 27, 2024, Ameren Missouri filed its *Notice of Case Filing,* giving notice that it will file an application for a CCN to construct a simple cycle natural gas generation facility. Therefore, unless (1) programs are carefully designed to avoid or defer a supply side resource and (2) sufficient modeling is performed to provide clear and demonstrable evidence that it is avoiding or deferring supply-side generation, any fourth MEEIA cycle should not include an EO. Program design, avoided costs, and earnings opportunity are further discussed in Mr. Luebbert's direct testimony.

Q. Does this conclude your direct testimony in this proceeding?

A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a Ameren Missouri's 4th Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA	)))))	Case No. EO-2023-0136

AFFIDAVIT OF BRAD J. FORTSON

STATE OF MISSOURI	)	
	)	ss.
COUNTY OF COLE	)	

COMES NOW BRAD J. FORTSON and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Direct Testimony of Brad J. Fortson*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

Brad J Fortson

BRAD J. FORTSON

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 28th day of February 2024.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2027
Commission Number: 15207377

Dianna L. Vaught

Notary Public

Brad J. Fortson

Education and Employment Background

I am the Regulatory Compliance Manager of the Energy Resources Department, Industry Analysis Division of the Missouri Public Service Commission. Prior to my current position, I was employed at the Missouri Public Service Commission as a Regulatory Economist from December 2012 through March 2015 and August 2015 through February 2019.

I received an Associate of Applied Science degree in Computer Science in May 2003, Bachelor of Science degree in Business Administration in May 2009, and Master of Business Administration degree with an emphasis in Management in May 2012, all from Lincoln University, Jefferson City, Missouri.

Prior to first joining the Commission, I worked in various accounting positions within four state agencies of the State of Missouri. I was employed as an Account Clerk II for the Inmate Finance Section of the Missouri Department of Corrections; as an Account Clerk II for the Accounts Payable Section of the Missouri Department of Health and Senior Services; as a Contributions Specialist for the Employer Accounts Section of the Missouri Department of Labor and Industrial Relations; and as an Accountant I for the Payroll Section of the Missouri Office of Administration. From April 1 through July 31, 2015, I worked for the Missouri Office of Public Counsel before joining the Commission once again.

Case Participation History

Case Number	Company	Issue	Exhibit
HR-2014-0066	Veolia Energy Kansas City	Revenue by Class and Rate Design	Staff Report
GR-2014-0086	Summit Natural Gas of Missouri, Inc.	Large Volume Service Revenue	Staff Report
ER-2014-0258	Union Electric Company d/b/a Ameren Missouri	Revenue by Class and Rate Design	Staff Report

ER-2014-0258	Union Electric Company d/b/a Ameren Missouri	Revenue by Class and Rate Design	Staff Report, Rebuttal & Surrebuttal Testimony
ER-2014-0351	The Empire District Electric Company	Revenue by Class and Rate Design	Staff Report & Rebuttal Testimony
ER-2014-0351	The Empire District Electric Company	Revenue by Class and Rate Design	Rebuttal Testimony
EO-2015-0240	Kansas City Power & Light Company	Custom Program Incentive Level	Direct Testimony
EO-2015-0241	KCP&L Greater Missouri Operations Company	Custom Program Incentive Level	Direct Testimony
ER-2016-0023	The Empire District Electric Company	DSM Programs and MEEIA Filings	Staff Report
ER-2016-0023	The Empire District Electric Company	DSM Programs and MEEIA Filings	Staff Report, Rebuttal & Surrebuttal Testimony
EM-2016-0213	The Empire District Electric Company (merger case)	DSM Programs and MEEIA Filings	Rebuttal & Surrebuttal Testimony
ER-2016-0156	KCP&L Greater Missouri Operations Company	MEEIA summary and LED street lighting	Staff Report
EO-2016-0183	Kansas City Power & Light Company	MEEIA prudence review	Staff Report
EO-2016-0223	The Empire District Electric Company	Triennial compliance filing	Staff Report
ER-2016-0285	Kansas City Power & Light Company	LED street lighting	Staff Report
ER-2016-0179	Union Electric Company d/b/a Ameren Missouri	LED street lighting	Staff Report
ER-2016-0285	Kansas City Power & Light Company	Response to Commissioner questions	Staff Report
ER-2016-0179	Union Electric Company d/b/a Ameren Missouri	Response to Commissioner questions	Staff Report
EO-2017-0209	Kansas City Power & Light Company	MEEIA prudence review	Staff Report
EO-2017-0210	KCP&L Greater Missouri Operations Company	MEEIA prudence review	Staff Report
EO-2015-0055	Union Electric Company d/b/a Ameren Missouri	Flex pay pilot program	Rebuttal Testimony
GR-2018-0013	Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities	Red Tag Program and Energy Efficiency Program Funding	Staff Report, Rebuttal & Surrebuttal Testimony

ER-2018-0145	Kansas City Power & Light Company	LED street lighting, TOU rates	Rebuttal Testimony
ER-2018-0146	KCP&L Greater Missouri Operations Company	LED street lighting, TOU rates	Rebuttal Testimony
EO-2018-0211	Union Electric Company d/b/a Ameren Missouri	Program Design	Rebuttal Report & Surrebuttal Testimony
EO-2019-0132	Kansas City Power & Light Company	Program Design	Rebuttal Report & Surrebuttal Testimony
EO-2019-0376	Union Electric Company d/b/a Ameren Missouri	MEEIA prudence review	Direct Testimony
ER-2019-0374	The Empire District Electric Company	Hedging policy and EE/LI programs	Supplemental Testimony
EO-2020-0280	Evergy Metro	IRP Annual Update	Staff Report
EO-2020-0281	Evergy Missouri West	IRP Annual Update	Staff Report
ER-2020-0311	The Empire District Electric Company	Fuel Adjustment Clause	Rebuttal Testimony
EO-2020-0227	Evergy Metro and Evergy Missouri West	MEEIA prudence review	Direct Testimony
EO-2020-0262	Evergy Metro and Evergy Missouri West	FAC prudence review	Direct & Rebuttal Testimony
EO-2021-0021	Union Electric Company d/b/a Ameren Missouri	Triennial compliance filing	Staff Report
EO-2021-0035	Evergy Metro	Triennial compliance filing	Staff Report
EO-2021-0036	Evergy Missouri West	Triennial compliance filing	Staff Report
EO-2021-0416	Evergy Missouri West	MEEIA prudence review	Staff Report
EO-2021-0417	Evergy Metro	MEEIA prudence review	Staff Report
EO-2022-0061	Evergy Missouri West	Application for Special Rate	Rebuttal Testimony
EO-2022-0064	Evergy Missouri Metro	FAC prudence review	Direct Testimony
EO-2022-0065	Evergy Missouri West	FAC prudence review	Direct Testimony
EO-2022-0040	The Empire District Electric Company	Securitization	Rebuttal Testimony
EF-2022-0155	Evergy Missouri West	Securitization	Rebuttal & Surrebuttal Testimony
ER-2022-0129	Evergy Missouri Metro	FAC	Direct & Surrebuttal Testimony

ER-2022-0130	Evergy Missouri West	FAC	Direct & Surrebuttal Testimony
EA-2022-0245	Union Electric Company d/b/a Ameren Missouri	CCN	Rebuttal Testimony
EA-2022-0328	Evergy Missouri West	CCN	Rebuttal Testimony
EA-2023-0286	Union Electric Company d/b/a Ameren Missouri	CCN	Rebuttal Testimony
ER-2023-0444	Evergy Missouri West	FAC	Rebuttal Testimony
EO-2023-0276	Evergy Missouri Metro	FAC	Rebuttal Testimony
EO-2023-0277	Evergy Missouri West	FAC	Rebuttal Testimony
EF-2024-0021	Union Electric Company d/b/a Ameren Missouri	Securitization	Rebuttal Testimony