

Schedule CB-8

Data Response Display - EO-2025-0154 - 0166.0

Request Summary ▼

Submission No.

EO-2025-0154

Request No.

0166.0

Requested Date

8/4/2025

Due Date

8/14/2025

Issue

General Information & Miscellaneous

Other

Requested From

MO PSC Staff (Other)

Lexi Klaus (lexi.klaus@psc.mo.gov)

Requested By

Google LLC (Other)

Sean M. Pluta (spluta@polsinelli.com)

Brief Description

Information Considered in Developing LLPS Tariff Plan

Description

1. Did Staff consult with any large load customer as part of the development of its proposed LLPS tariff plan? If so, please identify those customers and describe the input provided by them. 2. Did Staff consult with any utility in Missouri or the U.S., regarding its proposed LLPS tariff plan? If so, please identify those utilities and describe the input provided by them. 3. Did Staff evaluate large load tariffs implemented in other jurisdictions to inform its proposed LLPS tariff plan? If so, please identify all tariffs that Staff evaluated. 4. To Staff's knowledge, are there any other large load tariffs that are similar to Staff's proposal? If so, please identify those tariffs and describe the similarities and differences.

Request Security

Public (DR)

Response Date

8/26/2025

Response

1. Staff objected to this DR to the extent it requests non-public information of another utility, corporation, or person. Without waiving the objection, Staff states no. 2. Staff objected to this DR to the extent it requests non-public information of another utility, corporation, or person. Without waiving the objection, Staff states no. 3. Staff has generally kept abreast of issues, plans, and tariffs in various states including Ohio and Indiana, as described in the testimony of James Busch. 4. Staff has not conducted a detailed comparison to identify specific similarities with any given tariff.

Objections**Response Security**

Public (DR)

Rationale

Attachments ▼

No Attachments Found

Data Response Display - EO-2025-0154 - 0168.0

Request Summary ▼

Submission No.

EO-2025-0154

Request No.

0168.0

Requested Date

8/4/2025

Due Date

8/14/2025

Issue

Tariff Issue

Fuel Adjustment Charge

Requested From

MO PSC Staff (Other)

Lexi Klaus (lexi.klaus@psc.mo.gov)

Requested By

Google LLC (Other)

Sean M. Pluta (spluta@polsinelli.com)

Brief Description

Integrated Energy Market Issues

Description

In reference to Staff Recommendation, p. 22 lines 14-16, "it is difficult to isolate the expenses caused by LLPS customers that would otherwise be flowed through the FAC and which may cause unreasonable impacts on captive ratepayers." a. Please list each expense referred to above. b. For each expense listed in (a) above, please explain the basis for concluding that flowing this expense through the FAC may cause unreasonable impacts on captive ratepayers. c. Does the current method of flowing each of these expenses through the FAC result in a reasonable allocation of costs? Please explain.

Request Security

Public (DR)

Response Date

8/26/2025

Response

a. In addition to the costs discussed within the Section titled II. Capacity, Energy, and Market Issues of the Staff report, if a separate commercial pricing node is not established for LLPS customers, additional costs from congestion and losses may be included within the aggregated nodal pricing to serve load of each Evergy company. b. Please see the Section titled II. Capacity, Energy, and Market Issues of the Staff report in this case. Given the magnitude of the potential LLPS load and the additional reporting requirements for SPP of non-conforming load, it is logical to separately account for LLPS customers compared to other Evergy customers. Mismatches in cost allocation methodologies utilized by parties in future rate cases along with the manner in which costs and revenues flow through the FAC may also exacerbate these issues. c. The Commission has authorized the current FAC treatments as contained in the active FAC tariffs for each respective utility. The concerns Staff raises with regard to LLPS customers is that the scale of LLPS customers will differ significantly from current customers such that differing treatment is appropriate.

Objections

Response Security

Public (DR)

Rationale

No Attachments Found

Data Response Display - EO-2025-0154 - 0170.0

Request Summary ▼

Submission No.

EO-2025-0154

Request No.

0170.0

Requested Date

8/4/2025

Due Date

8/14/2025

Issue

Tariff Issue

Other

Requested From

MO PSC Staff (Other)

Lexi Klaus (lexi.klaus@psc.mo.gov)

Requested By

Google LLC (Other)

Sean M. Pluta (spluta@polsinelli.com)

Brief Description

Integrated Energy Market Issues

Description

In reference to Staff Recommendation, p. 22, lines 17-18, "Staff's recommended LLPS tariff sets out each area as a discrete charge in its recommended rate structure." a. Please explain why the current cost allocation methodology is not sufficient for the allocations of these costs. b. Please provide an estimate of the change in costs to LLPS customers that would occur under Staff's proposal.

Request Security

Public (DR)

Response Date

8/26/2025

Response

a. There is no current cost allocation for LLPS cost of service. b. There are no current costs to LLPS customers from which to compare.

Objections**Response Security**

Public (DR)

Rationale

Attachments ▼

No Attachments Found

Data Response Display - EO-2025-0154 - 0173.0

Request Summary ▼

Submission No.

EO-2025-0154

Request No.

0173.0

Requested Date

8/4/2025

Due Date

8/14/2025

Issue

Tariff Issue

Other

Requested From

MO PSC Staff (Other)

Lexi Klaus (lexi.klaus@psc.mo.gov)

Requested By

Google LLC (Other)

Sean M. Pluta (spluta@polsinelli.com)

Brief Description

Charges for Contributions to Fixed Cost Recovery

Description

In reference to Staff Recommendation, p. 58, lines 3-8, "Staff's recommended structure includes two charges so that the LLPS rate will be set to essentially the floor for economic development discount recipients established by Section 393.1640 RSMo., and so that, with appropriate accounting treatments, these rate schedules will reasonably ensure LLPS customers rates will reflect the customers' representative share of the costs incurred to serve the customers and prevent other customer classes' rates from reflecting any unjust or unreasonable costs arising from service to LLPS customers." a. Is Staff proposing an incremental cost approach for LLPS customers such as that described in Section 393.1640 RSMo? Please explain. b. If Staff is proposing an incremental cost approach for LLPS customers, please explain how this does not conflict with Staff's statement that, "Staff's position in this case is not to utilize incremental costs for designing rates for the LLPS customers," at page 7, lines 18-19. c. If Staff is not proposing an incremental cost tariff for LLPS customers, please explain why it is appropriate to set a floor on the rate for LLPS customers based on the floor for economic development discount recipients. d. Please define "the LLPS rate" ("the LLPS rate will be set to essentially the floor...") referenced above. Please explain. e. Please describe how the floor is determined for economic development discount recipients established by Section 393.1640 RSMo. f. What would be the rate for LLPS customers if it were determined according to Section 393.1640 RSMo?

Request Security

Public (DR)

Response Date

8/26/2025

Response

(a) Staff does not agree that Section 393.1640 constitutes an "incremental cost approach," and Staff is not proposing an incremental cost rate in that the rate recommended by Staff reflects historic plant investment in utility assets which are lower in original cost than will be the original cost of new assets, however, Staff is using Section 393.1640 as guidance as to a minimal level of fixed cost of service contribution from a new customer. (b) Staff is not proposing an incremental cost rate in that the rate recommended by Staff reflects historic plant investment in utility assets which are lower in original cost than will be the original cost of new assets. (c) Staff uses Section 393.1640 as guidance as to a minimal level of fixed cost of service contribution from a new customer. (d) In this sentence "the LLPS rate," refers to the revenues from and LLPS customer over the term of service of the LLPS customer.

Objections

Response Security

Public (DR)

Schedule CB-8

Rationale

Attachments ▼

No Attachments Found

Data Request Display - EO-2025-0154 - 0174.0

Request ▾

Submission No.

EO-2025-0154

Description

Notice of Intended Case Filing

Subject Company

Evergy Metro, Inc. (Electric) (Investor)

Style of Case

In the Matter of the Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Approval of New and Modified Tariffs for Service to Large Load Customers

Data Request Contact Person

Brad Lutz (Data Request) - Evergy Missouri Metro (Electric) (Investor)

Request No.

0174.0

Requested Date

8/4/2025

Due Date

8/14/2025

Days Elapsed

22

Issue

Tariff Issue

Sub-Issue

Sub-Issue 2

Other

Requested From

Company

MO PSC Staff (Other)

Representative

Lexi Klaus (lexi.klaus@psc.mo.gov)

Requested By

Company

Google LLC (Other)

Representative

Sean M. Pluta (spluta@polsinelli.com)

Brief Description

Charges for Contributions to Fixed Cost Recovery

Description

In reference to Staff Recommendation, p. 34, lines 26-29, "As will be discussed in the section 'Charges for Contributions to Fixed Cost Recovery,' under Staff's recommended structure and design, the LLPS rate will be set to essentially the floor established by Section 393.1640, RSMo., in that LLPS rates will be set to collect 120% of the cost of service that varies with the addition of a new LLPS customer." a. Please explain how is the 120% was determined by Staff. Provide all supporting data and calculations. If the data and calculations are in Staff's workpapers, please identify each workpaper and the location within the workpaper where the data is located.

calculations can be found. b. Please identify each cost, as identified by Staff, that varies with the addition of a new LLPS customer. c. Please explain how the floor established by Section 393.1640, RSMo relates to Staff's proposed Charges for Contributions to Fixed Cost Recovery? d. Has Staff verified that LLPS rates set to collect 120% of the cost of service correctly captures costs incurred on behalf of LLPS customers? If so, please provide all analysis and calculations e. Does the floor established by 393.1640, RSMo relate to other variable costs – besides Charges for Contributions to Fixed Cost Recovery – incurred to serve LLPS customers? If so, did Staff apply the same 120% mark-up? Please explain. If not, why do these variable costs not relate to the floor established by 393.1640, RSMo?

Schedule CB-8

Request Security

Public (DR)

Rationale

Attachments ▼

No Attachments Found

Response List (1)

Response Date	Response Security	Response	Objections	Rationale	Created By
8/26/2025	Public (DR)		Pierce, Melissa		

Data Response Display - EO-2025-0154 - 0194.0

Request Summary ▼

Submission No.

EO-2025-0154

Request No.

0194.0

Requested Date

8/4/2025

Due Date

8/14/2025

Issue

Tariff Issue

Other

Requested From

MO PSC Staff (Other)

Lexi Klaus (lexi.klaus@psc.mo.gov)

Requested By

Google LLC (Other)

Sean M. Pluta (spluta@polsinelli.com)

Brief Description

Load Serving Energy Choice

Description

In reference to Staff Recommendation, p. 56, lines 10-12, regarding the Load-Serving Energy Charge, "Staff recommends these rates [for cost of service associated with real time deviations, ancillary services, and those transmission expenses that vary with load versus demand] be set at initial rates of \$0.002 \$/kWh for the summer billing season, and \$0.001 \$/kWh for all non-summer billing seasons." a. Please explain the meaning of "vary with load versus demand." b. Please explain how initial rates of \$0.002 \$/kWh and \$0.001 \$/kWh were derived. c. Please identify the workpapers and the location within the workpapers where the calculation of the rates identified above can be found. d. Please explain how the cost of service associated with a real time load deviations is calculated by SPP. Please provide page references to the SPP tariff. e. To Staff's knowledge, are real time deviations for EMM and EMW based on aggregate supply and demand positions? Please explain. f. Please define ancillary services as used by Staff. g. Please explain how the cost associated with ancillary services is calculated by SPP. Please provide page references to the SPP tariff. h. Please explain how the cost of service associated with ancillary services for load is calculated by (i) SPP and (ii) by Evergy. i. Please identify the specific transmission expenses that vary with load versus demand as used in the passage above.

Request Security

Public (DR)

Response Date

8/26/2025

Response

(a) Load refers to energy in kWh or MWh, whether as a direct determinant or as an input into a load-ratio share calculation; while demand refers to demand in kW or MW, whether as a direct determinant or as an input into an allocator used by SPP. (b) These are placeholders provided by Staff with the expectation that Evergy would provide meaningful input into calculating updated values. (c) No such calculations were made. (d) For each interval, SPP calculates the differences between the day ahead load forecast of an LRE and the actual load of the LRE for that interval - this is the real time load. The real time LMP is derived consistent with SPP dispatch of resources to meet actual load. (e) Staff is unclear what is meant by "aggregate supply and demand positions," in this context; Staff's understanding is that the real time market is conducted and reconciled at a nodal level, with aggregate presentation of billing of aggregated pricing nodes for load. (f) Staff's use of "ancillary services" is consistent with SPP's tariff. (g) See SPP Tariff citations included in Staff's Recommendation. (h) SPP calculates charges and renders bills for ancillary services pursuant to its tariffs; EMM and EMW are not responsible for calculating the bills

that they have due to SPP. (i) Staff intends to work with Evergy to identify specific SPP billings that vary with load, and that vary with demand. Schedule CB-8

Objections

Response Security

Public (DR)

Rationale

Attachments ▼

No Attachments Found

Data Response Display - EO-2025-0154 - 0203.0

Request Summary ▼

Submission No.

EO-2025-0154

Request No.

0203.0

Requested Date

8/4/2025

Due Date

8/14/2025

Issue

Tariff Issue

Miscellaneous Charges

Requested From

MO PSC Staff (Other)

Lexi Klaus (lexi.klaus@psc.mo.gov)

Requested By

Google LLC (Other)

Sean M. Pluta (spluta@polsinelli.com)

Brief Description

Facilities Charge

Description

1. Please explain how the charges that Staff proposes to recover in the Facilities Charge are currently recovered from customers under Evergy's current CCOS framework. 2. Does Evergy's current cost recovery framework for Customer Charges reasonably allocate costs based on cost causation? If not, please explain.

Request Security

Public (DR)

Response Date

8/26/2025

Response

(1) Currently, no customers have prepaid for significant transmission infrastructure so no such charges currently exist. (2) Staff has significant concerns with the current cost recovery framework of both EMM and EMW, however, the current customer charges are not designed to recover the property taxes, maintenance expenses, and operational costs of significant prepaid transmission infrastructure.

Objections**Response Security**

Public (DR)

Rationale

Attachments ▼

No Attachments Found