

Exhibit No. 323

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OPC – Exhibit 323
Testimony of Lena Mantle
Supplemental Direct
File No. ER-2024-0189

Exhibit No.:

Issue(s):

Crossroads

Witness/Type of Exhibit: Mantle/Supplemental Direct

Sponsoring Party:

Public Counsel

Case No.:

ER-2024-0189

**SUPPLEMENTAL
DIRECT TESTIMONY**

OF

LENA M. MANTLE

Submitted on Behalf of the Office of the Public Counsel

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

CASE NOS. ER-2024-0189

September 15, 2025

SUPPLEMENTAL DIRECT TESTIMONY

OF

LENA M. MANTLE, P.E.

EVERGY MISSOURI WEST

FILE NO. ER-2024-0189

Q. What is your name?

A. Lena M. Mantle.

Q. Are you the same Lena M. Mantle who filed direct, rebuttal, and surrebuttal testimony in this case?

A. Yes, I am.

Q. What is the purpose of this testimony?

A. There is one unresolved issue in this case regarding the treatment of the transmission costs of Evergy Missouri West, Inc.'s ("Evergy West" or "EMW") Crossroads Energy Center ("Crossroads"). This issue is:

5. Crossroads Energy Center

A. Should the transmission costs EMW incurs to transmit energy from its Crossroads Energy Center at Clarksdale, Mississippi to its service area in Missouri due to this generating facility being located outside of EMW's regional transmission organization be included in EMW's revenue requirement?

i. If so, how much?

B. If the Commission includes transmission costs in EMW's revenue requirement, at what value should the Commission include Crossroads in EMW's rate base?

C. In this case, should the Commission determine it is prudent for Evergy to renew its firm point-to-point transmission service agreement with Entergy Corp. before it expires in February 2029?

1 **Q. What is your recommendation to the Commission regarding this issue?**

2 A. I recommend that the Commission continue to exclude from Evergy West's
3 revenue requirement the cost of transmission from the Crossroads Energy
4 Center in Mississippi to Western Missouri. Energy West has not shown that
5 it has taken any actions to make the transmission costs prudent. In addition,
6 I recommend that no change be made to the value of the Crossroads Energy
7 Center in Evergy West's rate base.

8 I recommend that the Commission take no position with regard to
9 the prudence of the renewal of the Crossroads transmission contract.
10 However, I do recommend that the Commission issue a strong warning to
11 Evergy West that if Evergy West follows through on its threat to not renew
12 its transmission contract for Crossroads, the current cost of capacity for
13 Crossroads will be imputed for the revenue requirement after the contract
14 ends regardless of the replacement capacity cost at that point in time.

15 **Q. Have you previously addressed this issue before the Commission in**
16 **either this case or others?**

17 A. I have written many pages of testimony regarding Evergy West's
18 Crossroads generation station across numerous cases before this
19 Commission both while I was on the Commission Staff and since I have
20 been employed by the Office of the Public Counsel ("OPC"). In this case
21 alone, I addressed the issue and provided extensive historical background
22 information as part of my direct, rebuttal, and surrebuttal testimony. That
23 testimony was offered and admitted during the prior evidentiary hearing
24 held in this case and is now included in the case file as hearing exhibits nos.
25 300, 301, and 302, respectively. For ease of reference, I have provided a
26 copy of each of those testimonies as Schedules LMM-D-11, Schedule
27 LMM-D-12, and Schedule LMM-D-13 to this testimony.

1 While the history of this plant and the decision making that resulted
2 in this plant being a generation resource of Evergy West is noteworthy,
3 important to this issue is that the Commission has previously found that
4 acquiring generation was prudent but acquiring it in the State of Mississippi
5 for customers in western Missouri was not. An extensive evaluation of the
6 Commission's decisions is also included in my prior filed testimony in this
7 case. Based on its findings, the Commission has allowed cost recovery of
8 the Crossroads generation plant but not the transmission expense Evergy
9 West incurs to deliver the electricity to Evergy West service territory. There
10 is no reason for the Commission to depart from these prior conclusions to
11 allow cost recovery now.

12 **Q. Is the recommendation that you provided above the same**
13 **recommendation you provided in your previously filed direct, rebuttal,**
14 **and surrebuttal testimony?**

15 A. Yes.

16 **Q. Has anything occurred since you wrote your direct, rebuttal, and**
17 **surrebuttal testimony in this case that has changed your position**
18 **regarding the inclusion of Crossroads transmission costs in Evergy**
19 **West's revenue requirement?**

20 A. No.

21 **Q. When will the current transmission contract end?**

22 A. As stated in the issue above, Evergy West's current contract with Entergy
23 for transmission will end in 2029.

1 **Q. When does Evergy West's contract with the city of Clarksburg end for**
2 **the Crossroads Generation station?**

3 A. Evergy West has a capital lease on the power generated at Crossroads
4 through 2032

5 **Q. If the transmission contract does not end until 2029, why is it an issue**
6 **in this case in 2025?**

7 A. The short answer is that Evergy West wants the Commission to make a
8 management decision for Evergy West now so as to remove any trace of the
9 uncertainty that the Company would otherwise be expected to contend with.

10 **Q. What is the management decision that Every West wants the**
11 **Commission to make?**

12 A. Evergy West wants the Commission to give its blessing to Evergy
13 Managements' decision regarding contract renewal and agree that the cost
14 of the transmission the Commission has previously found to be imprudent
15 will be transferred from shareholders to Evergy West's retail customers.

16 However, along with that question, Evergy West has threatened the
17 Commission that, if the Commission does not preapprove renewal of the
18 transmission contract with cost recovery from customers, Evergy West will
19 not renew the transmission. If the transmission contract is not renewed,
20 Crossroads will not be available to meet the capacity requirements of SPP.
21 Evergy states in its 2025 Resource Plan update that it has a large pipeline
22 of prospective new large customers that were not considered in its resource
23 planning process.¹ Losing Crossroads will limit Evergy West's ability to
24 provide service to large load customers without adding additional capacity.

¹ Case No. EO-2025-0251, *Evergy Missouri West 2025 Annual Update Integrated Resource Plan*,
pg. 14.

1 Evergy West's transmission contract ends in 2029 so there is not
2 enough time for Evergy West to build generation to replace these CTs. With
3 the changing SPP resource adequacy requirements and the projected
4 addition of large customers in the SPP, excess capacity is scarce and
5 expensive.

6 In other words, Evergy West has told the Commission to either give
7 it assurance that the transmission costs will be recovered from customers
8 (something the Commission has previously said was imprudent) or it will
9 take action that will result in the cost to serve its customers being much
10 higher than it would otherwise need to be.

11 **Q. Is the continuation of requiring shareholders to pay transmission costs**
12 **a penalty?**

13 A. No. It is an adjustment for imprudence. The Commission determined that
14 it was prudent for Evergy West (then KCP&L – Greater Missouri
15 Operations Company) to acquire generation but it was imprudent for it to
16 be in Mississippi.

17 **Q. Has Evergy West done anything to make the placement of these**
18 **generating units prudent?**

19 A. Not that I am aware of.

20 **Q. Has Evergy West done anything to exacerbate the imprudence of its**
21 **prior decision to acquire generation in Mississippi and not Missouri?**

22 A. Yes. The Evergy West made the decision to retire the Sibley 3 coal plant
23 more than twenty years before the previously projected end of the unit's
24 life. This resulted in a significant reduction in the Company's capacity and
25 greatly increased Evergy West's reliance on the Crossroads facility for
26 capacity.

1 **Q. Are you asking the Commission to now determine that the early**
2 **retirement of the Sibley coal plant was imprudent?**

3 A. No. The Commission has previously made a determination on the prudence
4 of Evergy West's decision to prematurely retire Sibley. Unless the
5 Commission determines in this case past decisions on prudence can be
6 reversed, the OPC considers the Commission's decision on prudence
7 regarding Sibley to be final.

8 **Q. Would you summarize your testimony?**

9 A. The Commission should maintain the current *status quo* as it relates to the
10 transmission costs associated with the Crossroads generating facility and
11 not bow to Evergy West's threats. Requiring the Company's shareholders
12 to pay these transmission costs is not a penalty; it is reflection and
13 rectification of the Company's imprudent management decisions. New
14 leadership does not make the decision any less imprudent.

15 **Q. Does this conclude your supplemental direct testimony?**

16 A. Yes.

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

In the Matter of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West's Request for Authority to)
Implement A General Rate Increase for Electric)
Service)
Case No. ER-2024-0189

AFFIDAVIT OF LENA M. MANTLE

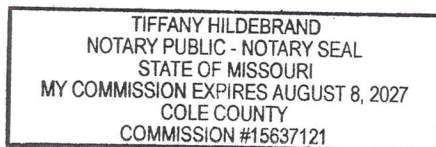
STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Lena M. Mantle, of lawful age and being first duly sworn, deposes and states:

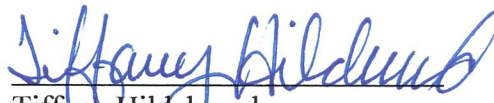
1. My name is Lena M Mantle. I am a Senior Analyst for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my supplemental direct testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.


Lena M. Mantle
Senior Analyst

Subscribed and sworn to me this 15th day of September 2025.



My Commission expires August 8, 2027.


Tiffany Hildebrand
Notary Public