

Exhibit No.:
Issue: Fuel Adjustment Clause
Witness: Linda J. Nunn
Type of Exhibit: Direct Testimony
Sponsoring Party: Evergy Missouri Metro
Case No.: ER-2026-0191
Date Testimony Prepared: January 30, 2026

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2026-0191

DIRECT TESTIMONY

OF

LINDA J. NUNN

ON BEHALF OF

EVERGY METRO, INC. d/b/a EVERGY MISSOURI METRO

**Kansas City, Missouri
January 2026**


In the Matter of the Application of Evergy)
Missouri Metro for Authority to) Case No. ER-2026-0191
Implement Rate Adjustments Required by)
20 CSR 4240-20.090(8) and the)
Company's Approved Fuel and Purchased)
Power Cost Recovery Mechanism)

STATE OF MISSOURI)
) **ss**
COUNTY OF JACKSON)

1. My name is Linda J. Nunn. I work in Kansas City, Missouri, and I am employed by Evergy, Inc. as Senior Manager – Regulatory Affairs.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

Subscribed and sworn to before me this 30th day of January 2026.



Notary Public



DIRECT TESTIMONY

OF

LINDA J. NUNN

Case No. ER-2026-0191

1 **Q: Please state your name and business address.**

2 A: My name is Linda J. Nunn. My business address is 1200 Main, Kansas City, Missouri
3 64105.

4 **Q: By whom and in what capacity are you employed?**

5 A: I am employed by Evergy Metro, Inc., as Senior Manager, Regulatory Affairs for
6 Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“EMM”), Evergy Missouri West, Inc.
7 d/b/a Evergy Missouri West (“EMW”), Evergy Metro, Inc. d/b/a Evergy Kansas Metro
8 (“EKM”), and Evergy Kansas Central, Inc. and Evergy Kansas South, Inc., collectively
9 d/b/a Evergy Kansas Central (“EKC”). These are the operating utilities of Evergy, Inc.

10 **Q: On whose behalf are you testifying?**

11 A: I am testifying on behalf of EMM.

12 **Q: What are your responsibilities?**

13 A: My responsibilities include the coordination, preparation, and review of financial
14 information and schedules associated with fuel or transmission impacts on rate case
15 filings, and the coordination, preparation and review of financial information and
16 schedules associated with retail rider mechanism tariff filings for Evergy including:
17 EKC, EKM, EMM and EMW.

18 **Q: Please describe your education.**

19 A: I received a Bachelor of Science Degree in Business Administration with a
20 concentration in Accounting from Northwest Missouri State University.

1 **Q: Please provide your work experience.**

2 A: I became a Senior Regulatory Analyst with Kansas City Power & Light (“KCP&L”) in
3 2008, as a part of the acquisition of Aquila, Inc., by Great Plains Energy. In 2013, I was
4 promoted to Supervisor - Regulatory Affairs. In 2018 I became Manager, Regulatory
5 Affairs. In 2025 I became Senior Manager, Regulatory Affairs. Prior to my employment
6 with KCP&L, I was employed by Aquila, Inc. for a total of eleven years. In addition to
7 Regulatory, I have had experience in Accounting, Audit, and Business Services, where
8 I had responsibility for guiding restructuring within the delivery division. In addition to
9 my utility experience, I was the business manager and controller for two area churches.
10 Prior to that, I was an external auditor with Ernst & Whinney.

11 **Q: Have you previously testified in a proceeding before the Missouri Public Service**
12 **Commission (“MPSC” or “Commission”) or before any other utility regulatory**
13 **agency?**

14 A: Yes, I have testified before the MPSC, and I have provided written testimony in various
15 dockets before the MPSC. I have also worked closely with many MPSC Staff on
16 numerous filings as well as on rate case issues. Additionally, I have provided written
17 testimony in Kansas Corporation Commission dockets.

18 **Q: What is the purpose of your testimony?**

19 A: The purpose of my testimony is to support the Fuel Adjustment Clause (“FAC”) that
20 has been filed by Evergy Missouri Metro (“Company”). This FAC tariff filing consists
21 of a Fuel Adjustment Rate (“FAR”) calculated using actual fuel and purchased power
22 costs, net of off-system sales revenues incurred by the Company. My testimony supports
23 the rate schedule filed to adjust rates for the FAC includable costs experienced during
24 the six-month period of July 2025 through December 2025. This six-month period

1 represents the 21st accumulation period under EMM's FAC, which was originally
2 approved by the Commission in Case No. ER-2014-0370 ("2014 Case") and modified
3 in Case Nos. ER-2016-0285 ("2016 Case"), ER-2018-0145 ("2018 Case") and ER-
4 2022-0129 ("2022 Case"). The proposed FAC charge for Missouri residential
5 customers is a charge of \$0.00142 per kWh. Based on usage of 1,000 kWh per month,
6 the customer will see a monthly charge of \$1.42. This represents an increase of \$0.41
7 to an EMM residential customer's monthly bill compared to the current monthly FAC
8 charge of \$1.01.

9 **Q: Please explain why EMM filed the FAC adjustment rate schedules at this time.**

10 A: The Commission's rule governing fuel and purchased power cost recovery mechanisms
11 for electric utilities – specifically 20 CSR 4240-20.090(8)(A) – requires EMM to make
12 periodic filings to allow the Commission to review the actual net FAC includable costs
13 the Company has incurred and to allow rates to be adjusted, either up or down, to reflect
14 those actual costs. The Commission's rule requires at least one such review and
15 adjustment each year. EMM's approved FAC calls for two annual filings – one filing
16 covering the six-month accumulation period running from January through June and
17 another filing covering the accumulation period running from July through December.
18 Any increases or decreases in rates in these filings are then included in the customers'
19 bills over a subsequent 12-month recovery period.

20 For the 21st accumulation period covering the period of July 2025 through
21 December 2025, EMM's actual FAC includable costs were higher than the base energy
22 costs included in base rates by approximately \$6 million. In accordance with the
23 Commission's rule and the Company's approved FAC, EMM has calculated the FAC
24 tariff that provides for a change in rates to recover 95% of those cost changes, or

1 approximately \$5.7 million to be collected from customers. This amount is before true-
2 up, interest or any other adjustments.

3 In addition, a true-up filing is being made concurrently with this filing covering
4 the 18th accumulation period of January 2024 through June 2024 and its corresponding
5 recovery period of October 2024 through September 2025. The proposed 18th recovery
6 period results in a true-up amount of \$439,710 to be collected from customers.

7 In summary, these amounts combined with interest amounting to \$247,842
8 result in a proposed Fuel and Purchased Power Adjustment (“FPA”) of approximately
9 \$6.4 million. The tariff being submitted with this filing reflects rates effective April 1,
10 2026.

11 **Q: What are some of the drivers impacting this accumulation period?**

12 A: EMM’s Actual Net Energy Costs (“ANEC”) exceed the base energy costs included in
13 base rates by approximately \$6 million. When compared to the prior 20th accumulation
14 period, the ANEC are \$13 million higher in the 21st accumulation period. This is due
15 to a \$23.7 million, or 21%, increase in fuel costs which were impacted by Wolf Creek’s
16 refueling outage between October 2 and November 16, 2025. In addition, off-system
17 sales decreased \$16.1 million, or 16%. These higher costs were offset by a \$26.9
18 million, or 21%, decrease in purchased power. The published NYMEX natural gas
19 contract settlement price averaged \$3.31 which is 7% lower than the prior 20th
20 accumulation period average of \$3.55.

21 **Q: How did you develop the various values used to derive the proposed FARs that are**
22 **shown on Schedule LJM-1?**

23 A: The proposed tariff rates are shown in Schedule LJM-1. The filing made in conjunction
24 with this testimony contains all the information as set in 20 CSR 4240-20.090(8)(2)(A)

which supports these proposed rates. In addition, I am submitting a copy of the work papers that support the determination of the current FAR.

Q: Please describe the impact of the change in costs and how it will affect a typical customer.

A: The proposed current period FARs for EMM's customers by voltage level is shown below:

Proposed Current Period FARs	
	\$ per kWh
Voltage	Rates
Transmission	\$0.00067
Substation	\$0.00067
Primary	\$0.00068
Secondary	\$0.00069

This is the difference between the base FAC includable costs and the actual costs incurred by the Company including interest and any adjustments during the current 21st accumulation period of July 2025 through December 2025 and will be included in billed FAC rates over a recovery period running from April 2026 through March 2027.

The proposed FAR was calculated in the manner specified in the Company's FAC. Attached to my testimony, as Schedule LJN-1, is a copy of the proposed tariff sheet with the current FAR, the prior period FAR and the total FAR that will be billed to customers over the recovery period. The FAR calculated for the 19th accumulation period has been removed as its recovery period will cease in March 2026. The FAR for the prior 20th accumulation period is added to the FAR for the current 21st accumulation period to provide the annual FAR. Thus, given the proposed current FAR calculations, the annual FARs for EMM customers are shown in the table below:

	ER-2026-0030		
Service	Proposed 6th Revised Sheet No. 50.42	Current 5th Revised Sheet No. 50.42	Impact
Transmission	\$0.00137	\$0.00097	\$ 0.00040
Substation	\$0.00138	\$0.00098	\$ 0.00040
Primary	\$0.00139	\$0.00098	\$ 0.00041
Secondary	\$0.00142	\$0.00101	\$ 0.00041

These proposed rates will be billed to customers from April 2026 through September 2026. As stated earlier, based on usage of 1,000 kWh per month this will result in a monthly FAC charge of \$1.42, which is an increase of \$0.41 to an EMM residential customer's monthly bill compared to the current monthly FAC charge of \$1.01.

Q: If the rate schedules filed by EMM are approved or allowed to go into effect, what safeguards exist to ensure that the revenues the Company bills to its customers do not exceed the fuel and purchased power costs that EMM actually incurred during the accumulation period?

A: EMM's FAC and the Commission's rules provide two mechanisms to ensure that amounts billed to customers do not exceed the Company's actual, prudently incurred fuel and purchased power costs. First, at the end of each recovery period the Company is required to true up the amounts billed to customers through the FAR with the excess fuel and purchased power costs that were actually incurred during the accumulation period to which the FAR applies. Second, the Company's fuel and purchased power costs are subject to periodic prudence reviews to ensure that only prudently incurred fuel and purchased power costs are billed to customers through EMM's FAC. These two mechanisms serve as checks to ensure that the Company's customers pay only the prudently incurred, actual costs of fuel and purchased power used to provide electric service.

1 **Q: Have each of these mechanisms been in effect throughout the FAC process since**
2 **its inception in the 2014 Case?**

3 A: Yes, EMM recently completed its sixth prudence review, Case No. EO-2025-0073, for
4 the review period of January 2023 through June 2024, where MPSC Staff found no
5 evidence of imprudence.

6 In the previous fifth prudence review, Case No. EO-2023-0276, for the review
7 period of July 2021 through December 2022, parties resolved certain issues pertaining
8 to purchased power and subsequent FAC reporting through a Non-Unanimous
9 Stipulation and Agreement which the Commission approved on May 12, 2024.

10 On September 14, 2022, in the Company's fourth prudence review, Case No.
11 EO-2022-0064, the Commission approved the Non-Unanimous Stipulation and
12 Agreement filed on July 25, 2022, where the Company agreed, with no admission of
13 imprudence, to a one-time FAC adjustment for 2017 vintage expired RECs. The
14 Company refunded \$703,825 plus interest of \$28,134 in the 15th accumulation period
15 filing, Case No. ER-2023-0245.

16 On May 4, 2022, in the Company's third prudence review, Case No. EO-2020-
17 0263 later consolidated in Case No. EO-2020-0262, the Commission issued its Report
18 and Order finding Evergy was imprudent by not utilizing demand response programs
19 to reduce energy costs for its customers during the review period of July 2018 through
20 December 2019. Therefore, the Company refunded the amount of \$152,165 plus
21 interest of \$7,947 in the 14th accumulation period, Case No. ER-2023-0030. Also in the
22 third prudence review, on January 20, 2021, an ordered adjustment for Montrose was
23 stipulated by parties amounting to \$199,104. Based on the agreement by parties, rather
24 than recovering this amount through the FAC, the Company recorded this to the Cost

1 of Removal FERC account for consideration in the 2022 general rate case, Case No.
2 ER-2022-0129, and refunded the amount of \$199,104 plus interest of \$10,281 in the
3 11th accumulation period FAR filing, Case No. ER-2021-0244.

4 In the first and second prudence reviews, the MPSC Staff indicated in each of
5 their reports that there were no areas of imprudence identified within the audits.

6 In addition, the Company has made 17 true-up filings, all of which were
7 approved by the MPSC. The 18th true-up filing is being made concurrent with this
8 semi-annual filing covering the 18th accumulation period of January 2024 through June
9 2024 and its corresponding recovery period of October 2024 through September 2025.
10 The Company's calculation of the proposed true-up resulting in a true-up amount of
11 \$439,710 to be collected from EMM customers has been included in the calculation of
12 the current proposed tariff change.

13 **Q: What action is EMM requesting from the Commission with respect to the rate**
14 **schedules that the Company has filed?**

15 A: The Company requests the Commission approve the proposed rate schedules to be
16 effective as of April 1, 2026.

17 **Q: Does this conclude your testimony?**

18 A: Yes, it does.

EVERGY METRO, INC. d/b/a EVERGY MISSOURI METRO

P.S.C. MO. No. 7 6th **Revised Sheet No.** 50.42
Canceling P.S.C. MO. No. 7 5th **Revised Sheet No.** 50.42

For Missouri Retail Service Area

FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC
 (Applicable to Service Provided January 9, 2023 and Thereafter)
 Effective for the Customer Usage Beginning April 2026 through September 2026

Accumulation Period Ending: December 2025			
1	Actual Net Energy Cost (ANEC) = (FC+E+PP+TC-OSSR-R)		\$164,343,669
2	Net Base Energy Cost (B)	-	\$153,764,506
	2.1 Base Factor (BF)		\$0.01829
	2.2 Accumulation Period NSI (S _{AP})		8,407,026,002
3	(ANEC-B)		\$10,579,163
4	Jurisdictional Factor (J)	x	57.19422%
5	(ANEC-B)*J		\$6,050,670
6	Customer Responsibility	x	95%
7	95% *((ANEC-B)*J)		\$5,748,136
8	True-Up Amount (T)	+	\$439,710
9	Interest (I)	+	\$247,842
10	Prudence Adjustment Amount (P)	+	\$0
11	Fuel and Purchased Power Adjustment (FPA)	=	\$6,435,688
12	Estimated Recovery Period Retail NSI (S _{RP})	÷	9,854,146,348
13	Current Period Fuel Adjustment Rate (FAR)	=	\$0.00065
14			
15	Current Period FAR _{Trans} = FAR x VAF _{Trans}		\$0.00067
16	Prior Period FAR _{Trans}	+	\$0.00070
17	Current Annual FAR _{Trans}	=	\$0.00137
18			
19	Current Period FAR _{Sub} = FAR x VAF _{Sub}		\$0.00067
20	Prior Period FAR _{Sub}	+	\$0.00071
21	Current Annual FAR _{Sub}	=	\$0.00138
22			
23	Current Period FAR _{Prim} = FAR x VAF _{Prim}		\$0.00068
24	Prior Period FAR _{Prim}	+	\$0.00071
25	Current Annual FAR _{Prim}	=	\$0.00139
26			
27	Current Period FAR _{Sec} = FAR x VAF _{Sec}		\$0.00069
28	Prior Period FAR _{Sec}	+	\$0.00073
29	Current Annual FAR _{Sec}	=	\$0.00142
30	VAF _{Trans} = 1.0300		
31	VAF _{Sub} = 1.0378		
32	VAF _{Prim} = 1.0497		
33	VAF _{Sec} = 1.0690		