

Exhibit No.:

Issue: Energy Price Forecasting; Fuel, Purchased Power and Off-system Sales Normalization; FAC Requirements

Witness: Hsin Foo

Type of Exhibit: Direct Testimony

Sponsoring Party: Evergy Missouri Metro

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MISSOURI PUBLIC SERVICE COMMISSION

CASE NOS.: ER-2026-0143

DIRECT TESTIMONY

OF

HSIN FOO

ON BEHALF OF

EVERGY MISSOURI METRO

Kansas City, Missouri

February 2026

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**DIRECT TESTIMONY
OF
HSIN FOO**

Case No. ER-2026-0143

I. INTRODUCTION

2 Q: Please state your name and business address.

3 A: My name is Hsin Foo. My business address is 1200 Main Street, Kansas City,
4 Missouri 64105.

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

6 A: I am employed by Evergy Metro, Inc. and serve as Lead Quantitative Analyst-
7 Generation Resources for Evergy Metro, Inc. d/b/a as Evergy Missouri Metro
8 (“Evergy Missouri Metro,” “EMM,” or the “Company”), Evergy Missouri West,
9 Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”), Evergy Metro, Inc.
10 d/b/a Evergy Kansas Metro (“Evergy Kansas Metro”), and Evergy Kansas Central,
11 Inc. and Evergy South, Inc., collectively d/b/a as Evergy Kansas Central (“Evergy
12 Kansas Central”) the operating utilities of Evergy, Inc. (“Evergy”).

13 Q: Who are you testifying for?

14 A: I am testifying on behalf of Evergy Missouri Metro.

15 Q: What are your responsibilities?

16 A: My primary responsibilities include developing and managing PROMOD® IV
17 (“PROMOD”) models, providing electric price forecasting and analysis in support
18 of power marketing analytics, market modeling, and fuel management.

1 Q: **Please describe your education, experience and employment history.**

2 A: I graduated from the University of Michigan in May 2004 with a Bachelor of
3 Science degree in Industrial & Operations Engineering. In May 2010, I received
4 Master of Science degrees in Financial Engineering and Mathematics from
5 Claremont Graduate University.

6 I began my career with DTE Energy in 2004 in the Market Intelligence
7 group as a Programmer Analyst. My primary responsibilities were to perform
8 energy industry simulation runs using the PROMOD model, and to perform market
9 research and analysis to develop a corporate view on economic fundamentals in
10 support of generation, fuel, and emissions operations. In 2007, I joined 330
11 Investment Management, a hedge fund in Chicago, as an associate where my role
12 was to model and analyze transmission congestion to support Financial
13 Transmission Rights (“FTR”) trading activity in the Midcontinent Independent
14 System Operator (“MISO”), PJM Interconnection, LLC (“PJM”), New York
15 Independent System Operator (“NYISO”) and ISO New England (“NEPOOL”)
16 markets.

17 My employment at Kansas City Power & Light Company (“KCPL”) began
18 in 2010 as a Quantitative Analyst where my primary responsibility was to develop
19 a Southwest Power Pool (“SPP”) focused electric generation and transmission
20 fundamental model using PROMOD in anticipation of the Southwest Power Pool
21 Integrated Marketplace (“SPP IM”). Since then, I have been promoted to Senior
22 Quantitative Analyst and most recently, Lead Quantitative Analyst, where I am one
23 of the company’s principal PROMOD modelers.

1 Q: Have you previously testified in a proceeding at the Missouri Public Service
2 Commission (“MPSC” or “Commission”) or before any other utility
3 regulatory agency?

4 A: Yes. I have provided testimony in Evergy Missouri West's most recent rate case,
5 No. ER-2024-0189.

6 Q: What is the purpose of your direct testimony?

7 A: The purpose of my direct testimony is to describe the level of fuel expense,
8 purchase power expense, and the wholesale sales revenues filed in the direct
9 testimony of Company witness Ronald A. Klotz. I will also provide information
10 regarding the requirements necessary to support the Company's request for
11 continued use of the Fuel Adjustment Clause ("FAC"). I specifically address all or
12 a portion of the requirements of 20 CSR 4240-20.090(2)(A)15.-17. Please note that
13 the modeling described in my testimony is done at the Evergy Metro level, and the
14 values reflected in **Confidential Schedule HYF-4** represent Evergy Metro. The
15 appropriate allocation factors can be applied to the Evergy Metro values to obtain
16 the portion applicable to Evergy Missouri Metro.

II. ENERGY PRICE FORECASTING

18 Q: Please describe how Evergy Missouri Metro forecasts electricity prices.

19 A: Every Missouri Metro utilizes PROMOD, a modeling software that is similar to
20 other fundamental price forecasting models that are commonly used in the industry.
21 PROMOD is provided by Hitachi Energy (formerly ABB). PROMOD incorporates
22 details in generating unit operating characteristics, transmission grid topology and
23 constraints, and market system operations to simulate power flows within and

1 between various energy markets, including Independent System Operators
2 (“ISOs”), Regional Transmission Organizations (“RTOs”), and other North
3 American Electric Reliability Corporation (“NERC”) regions. PROMOD performs
4 a security constrained unit commitment and co-optimized economic dispatch to
5 generate Locational Marginal Prices (“LMPs”) at the nodal level, similar to how
6 ISOs and RTOs set schedules and determine prices. The Company uses PROMOD
7 for various purposes, such as generating market price forecasts, supporting resource
8 planning decisions, fuel and interchange budgeting, and purchasing and sales
9 analysis.

10 **Q: What are the primary inputs to the model?**

11 A: The model utilizes a sizeable input dataset that is populated with assumptions about
12 market supply, demand, and transmission. The bulk of the input assumptions use
13 NERC reports, Federal Energy Regulatory Commission (“FERC”) Form 1 data,
14 Energy Information Administration (“EIA”) 411 reports, Continuous Emissions
15 Monitoring System (“CEMS”) data compiled by the Environmental Protection
16 Agency (“EPA”), and publicly available data reported by the various ISOs and
17 RTOs as sources. The demand data includes projected hourly demand for virtually
18 every electric power entity in the Eastern Interconnect. The supply data contains a
19 representation of all generating units within those entities and their operating
20 characteristics, including capacity, heat rate, fuel type, variable operations and
21 maintenance costs, outage rates, emissions rates, and start-up costs. Other primary
22 inputs are fuel (e.g., coal, natural gas, fuel oil) prices, emission allowance prices,
23 renewable energy generation, reserve requirements, hurdle rates, and

1 import/exports to external areas. The dataset also includes detailed transmission
2 grid topology, transmission constraints, and contingency events within and between
3 regions.

4 **Q: How does the model use this data to forecast power prices?**

5 A: PROMOD performs an hourly chronological commitment and dispatch of available
6 generation resources to meet projected hourly demand in each region, as defined in
7 the model's geographic topology. For each hour, the model calculates the cost of
8 generation, comprised of the production cost of the least-cost generating unit
9 needed to meet demand. The model also determines the hourly cost of congestion,
10 which is the added cost of needing higher-cost generators due to transmission
11 constraints. Both the cost of generation and the cost of congestion make up the
12 hourly power price, or LMP. Hourly LMPs are generated across the model
13 footprint at the nodal level, which means generators at different locations may have
14 different LMPs in each hour. The model aims to minimize these system costs while
15 simultaneously adhering to operating constraints and transmission grid limitations
16 to meet load reliably. This is comparable to how SPP, the RTO in which the
17 Company resides, calculates its power prices.

18 **Q: Is this done for only one region?**

19 A: No. Every Missouri Metro's model footprint includes SPP, MISO, PJM,
20 Associated Electric Cooperative Inc. ("AECI"), Southwestern Power
21 Administration ("SPA"), Tennessee Valley Authority ("TVA"), and Louisville Gas
22 and Electric Company and Kentucky Utilities Company ("LGE/KU"). The model
23 also includes imports and exports across the high-voltage direct current ("HVDC")

1 ties which connect SPP to the Western Interconnect and Electric Reliability Council
2 of Texas (“ERCOT”), as well as other external areas that are not dynamically
3 modeled (e.g., Florida, New York Independent System Operator (“NYISO”), etc.).
4 Units may be economically dispatched to serve load in a neighboring region if
5 transmission capacity exists.

6 **Q: What is your opinion of the resulting forecasts?**

7 A: The fundamental supply and demand data are relatively good. The demand forecast
8 from utilities and the existing public data on installed generation capacity are
9 sufficiently reliable, so identifying a reasonable unit to base an hourly price on can
10 be done with a reasonable degree of confidence. The input assumptions that create
11 a larger challenge are fuel price and wind, as discussed herein. In SPP, the market
12 price is usually set by one of three fuels: wind, coal, or natural gas. Wind generation
13 is typically the marginal resource during off-peak hours, while coal or gas is largely
14 the marginal resource during on-peak hours in SPP.

15 **Q: How difficult is it to predict the price of coal and natural gas?**

16 A: Coal prices are relatively stable and the model inputs are based on actual reported
17 fuel costs. So, the impact of coal on power prices can be forecasted with relative
18 accuracy when coal is the marginal fuel. Natural gas prices are more volatile and
19 difficult to predict because of rapid shifts in weather-driven demand, supply
20 constraints from infrastructure issues, as well as external factors such as,
21 geopolitical events, production changes, and market speculation.

1 Q: **How difficult is it to predict wind generation?**

2 A: Wind generation can be erratic and unpredictable. In 2025, wind generation served
3 anywhere between 85% and 2% of SPP load.¹ Schedule HYF-1 shows the volatility
4 of wind generation in SPP from January 2025 to December 2025. Large swings in
5 generation from wind farms can happen over a very short period, which can have a
6 sizeable impact on transmission congestion, and in turn impact LMPs. The natural
7 variability of wind makes it difficult to predict power prices.

8 Q: **How accurate are the power price forecasts?**

9 A: The power price forecasts are relatively accurate when the load forecast, fuel price
10 forecast, and wind forecast are accurate. Deviations from the observed market price
11 are typically congestion costs that are not captured due to unexpected generation or
12 transmission outages, or power flows from neighboring regions (e.g., MISO or
13 AECI).

14 **III. FUEL, PURCHASE POWER, AND OFF-SYSTEM SALES**
15 **NORMALIZATION**

16 Q: **What method for normalizing the test year fuel cost, purchase power cost, and
17 off-system sales did you use in this case?**

18 A: System peak load and energy, prices paid for fuel, generating system maintenance
19 schedules, and generating resource availability were normalized and annualized to
20 normalize the test year fuel cost, purchase power cost, and off-system sales revenue.
21 PROMOD was then used to simultaneously solve for power prices, the appropriate

¹ See Schedule HYF-1.

1 generation and purchase power levels, and the resulting fuel cost, purchase power
2 cost, and off-system sales revenue.

3 **Q: Please describe the normalization of the system requirements for this rate case.**

4 A: Evergy Missouri Metro's native load was adjusted to reflect weather normalized
5 and annualized customer growth by the Company's load forecasting personnel.
6 This process is described in detail in the direct testimony of Company witness
7 Albert R. Bass. These normalized monthly peak demands and energy requirements
8 were used as inputs into the PROMOD model. The software distributes these
9 monthly energy requirements on an hourly basis, then utilizes the normalized
10 hourly system loads to shape the normalized loads. The resulting load shape was
11 then used in the normalized production cost modeling.

12 The Company's wholesale contract customers that contained an energy
13 component were added to the native load to arrive at the total system requirement.

14 **Q: Please describe these wholesale contract customers.**

15 A: These are energy sales to the City of Eudora ("Eudora"). The revenue for this
16 transaction and the associated fuel expense is included in **Confidential Schedule**
17 **HYF-4**².

18 **Q: Please describe the fuel price normalization.**

19 A: The normalized fuel prices used in the modeling are described in the direct
20 testimony of Company witness Jessica Tucker. These plant-specific fuel prices
21 were then input and used in the normalized PROMOD run.

² The amounts reflected in Confidential Schedule HYF-4 represent Evergy Metro. The appropriate allocation factors can be applied to the Evergy Metro values to obtain the portion applicable to Evergy Missouri Metro.

1 Q: **Please describe the maintenance outages normalization.**

2 A: Every Missouri Metro performs scheduled maintenance on its base load
3 generating units on a cyclical basis over a set number of years, i.e., a specific unit
4 in any given year may have an extended turbine generator outage, an extended
5 boiler outage, a shorter boiler outage, a short inspection outage, or no outage at all.
6 Consequently, in any specific year there may be higher or lower scheduled
7 maintenance outages than the long-term average maintenance outages. To
8 normalize the availability of the generating resources, the total number of weeks
9 that a unit would be scheduled for maintenance over the cycle was averaged over
10 the number of years in the maintenance cycle. These normalized maintenance
11 outage assumptions were then spread over a 12-month period to develop a
12 normalized maintenance schedule. These outages were scheduled such that all base
13 load generating resources would be available during the peak load periods of June
14 through August, and December through February. **Confidential Schedule HYF-2**
15 contains the maintenance schedule that was used for the normalization.

16 Q: **Please describe the generating resources availability normalization.**

17 A: As part of Every Missouri Metro's operating plan, the Company's coal generating
18 units, Iatan 1 and La Cygne 1, are expected to be on seasonal layup during the
19 spring months of March, April, and May, as well as the fall months of October and
20 November. The Company will offer at least one coal unit at each station, except
21 Hawthorn, as normal to the SPP market and offer the remaining coal units with
22 extended startup times. This is enabled by high wind production, low natural gas
23 prices, and low demand during the spring and fall months. Seasonal layup will

1 allow the Company to reduce wear and tear on the generating units and ultimately
2 lower costs. The plan for seasonal layup is scheduled in tandem with the
3 normalized maintenance outage schedule, such that all the Company's coal stations
4 will always have at least one unit available to the market. **Confidential Schedule**
5 **HYF-3** contains the seasonal layup schedule that was used for the normalization.

6 **Q: Please describe the generating resources available capacity normalization.**

7 A: The generating resources available in the rate case modeling are the same as Evergy
8 Missouri Metro's resources, which include capacity levels that are expected to be
9 in place and operational as of the true-up date in this case. The normalized capacity
10 levels account for amounts that have historically been needed by the ancillary
11 services market. They also include qualitative adjustments made to compensate for
12 model biases and limitations, and to improve trends of the Company's coal fleet
13 resources' historical annual generation output.

14 **Q: Please describe the winter layup at Hawthorn Generating Station.**

15 A: Unit 6/9 at the Hawthorn Generating Station ("Hawthorn") is a natural gas-fired
16 combined cycle turbine owned and operated by the Company. The unit typically
17 operates on a seasonal basis, from May to October, and will enter "winter layup"
18 from early November through late April. As such, Hawthorn Unit 6/9 is made
19 unavailable in PROMOD starting November 1st through April 30th.

20 **Q: Why is Hawthorn Unit 6/9 not available year-round?**

21 A: There are two major reasons why the unit goes into winter layup each year:
22 1. Ambient air temperature: Unit 6/9 has cooling dampers that draw in
23 atmospheric air for generator temperature control, and there is a certain

temperature built into the controls logic that enables or disables the generator's ability to synchronize to the grid. This "temperature permissive" only allows the unit to synchronize to the grid at 32 degrees or more, otherwise the unit will trip or not start.

2. Gas availability: As temperatures decrease in winter, gas demand rises. Gas companies curtail capacity in the pipelines to power plants as demand rises from their residential customers. These gas curtailments prevent Unit 6/9 from operating in the winter.

Q: Has there been changes to Evergy Missouri Metro's generating resource portfolio?

11 A: Since the last rate case filing, No. ER-2022-0129, Evergy Missouri Metro has ended
12 its agreement with the Central Nebraska Public Power and Irrigation District
13 (“CNPPID”) hydro units. These three facilities, each with a capacity of 20 mega-
14 watts (“MW”), are no longer part of the Company’s generation asset portfolio. The
15 Company’s portfolio also now includes 66% ownership of Hawthorn Solar, a solar
16 facility with a capacity of 10MW that became operational in 2023, located near the
17 existing Hawthorn station.

18 Q: How was the generation from renewable resources modeled in this case?

19 A: Wind generation from the Spearville 1 and 2 Wind Farms, owned by Evergy
20 Missouri Metro, was modeled based upon actual 12-month ending December 2024
21 historical generation. Wind generation from Power Purchase Agreements (“PPA”)
22 resources that are operating and under contract were also included. These are the
23 Cimarron Wind Farm, Osborn Wind Farm, Ponderosa Wind Farm, Prairie Queen

1 Wind Farm, Pratt Wind Farm, Rock Creek Wind Farm, Slate Creek Wind Farm,
2 Spearville 3 Wind Farm and Waverly Wind Farm. The generation levels were
3 based and actual 12-month ending December 2024 historical generation and their
4 energy prices were based upon signed contracts.

5 Generation from the Hawthorn Solar facility is based on projected normal
6 generation levels.

7 **Q: For the test period, what revenue and expense items, if any, were adjusted as
8 a result of normalizing fuel cost, purchased power costs, and off-system sales?**

9 A: Adjustments were made to fuel costs to reflect both a normalized fuel market and
10 normalized generation levels. Purchased power expense and bulk power sales were
11 also adjusted to reflect the changes in the quantity of energy purchased or sold, and
12 the prices of such purchases or sales. **Confidential Schedule HYF-4** shows the
13 generation levels by resource type, purchased power levels, the costs of each, and
14 the revenues from generation sales and wholesale contract customers³.

15 **IV. ADJUSTMENTS TO THE NORMALIZED FUEL, PURCHASE POWER,
16 AND WHOLESALE SALES RESULTS**

17 **Q: Does Evergy Missouri Metro propose any adjustments to the PROMOD® IV
18 model results?**

19 A: Yes. Adjustments should be made for
20

- the Renewable Energy Rider (“RER”) program,

21 - SPP Purchase Power Administrative Fees,

22 - SPP purchases and sales for ancillary services,

³ The amounts reflected in Confidential Schedule HYF-4 represent Evergy Metro. The appropriate allocation factors can be applied to the Evergy Metro values to obtain the portion applicable to Evergy Missouri Metro.

- SPP Revenue Neutrality Uplift (“RNU”) charges,
- line loss payments related to the Missouri Iowa Nebraska Transmission (“MINT”) line, and
- Auction Revenue Rights (“ARR”) and Transmission Congestion Right (“TCR”) margins.

6 Q: What is the RER program?

7 A: The RER program allows non-residential Evergy Missouri Metro customers to
8 purchase renewable energy from renewable resources that the Company contracts.

9 Q: Why is it appropriate that adjustments be made for the RER program?

10 A: Revenues and costs associated with this program are included in the model used by
11 the Company to calculate fuel and purchase power costs but should not be included
12 as part of the FAC. As such, the revenues and costs associated with the RER
13 program should be removed as an adjustment to Evergy Missouri Metro's FAC
14 base rate calculation.

15 Q: **What amount of the RER adjustments has Evergy Missouri Metro included in**
16 **this case?**

17 A: The amount of RER adjustments is based on the adjusted and annualized values
18 from the Company's model results. These values will be updated to actual amounts
19 for the most recent 12-months at true-up.

20 Q: What are SPP Purchase Power Administrative Fees?

21 A: As a participant in the SPP IM, SPP charges Evergy Missouri Metro administrative
22 fees related to costs of running and operating the SPP market. These charges
23 include fees to recover the costs of operating the Day-Ahead and Real-Time

1 Balancing markets, market settlements, credit services, market monitoring and
2 Transmission Congestion Rights (“TCR”) operations.

3 **Q: Why is it appropriate that adjustments be made for SPP Purchase Power
4 Administrative Fees?**

5 A: These charges are not included in the model used by the Company to calculate fuel
6 and purchase power costs. As such, the SPP Purchase Power Administrative Fees
7 should be included as an adjustment to Evergy Missouri Metro’s model results.
8 Absent this adjustment, these charges would not otherwise be reflected in the
9 Company’s retail cost of service.

10 **Q: What amount of SPP Purchase Power Administrative Fees has Evergy
11 Missouri Metro included in this case?**

12 A: The amount of SPP Purchase Power Administrative Fees included in this case is
13 the actual payments for the 12-months ending August 2025. This adjustment is
14 shown in **Confidential Schedule HYF-4**⁴. These values will be updated to the
15 actual amounts for the most recent 12-months at true-up.

16 **Q: What are ancillary services purchases and sales?**

17 A: As a participant in the SPP IM, Evergy Missouri Metro is obligated to provide or
18 procure certain ancillary services. These services include spinning, supplemental,
19 and regulating reserves. Evergy Missouri Metro purchases its SPP-specified
20 ancillary services from the SPP-operated ancillary services market. In addition,
21 Evergy Missouri Metro can sell these ancillary services in the SPP-operated market.

⁴ The amounts reflected in Confidential Schedule HYF-4 represent Evergy Metro. The appropriate allocation factors can be applied to the Evergy Metro values to obtain the portion applicable to Evergy Missouri Metro.

1 **Q: Why is it appropriate that Evergy Missouri Metro include adjustments for**
2 **ancillary services?**

3 A: These charges and revenues are not included in the model used by the Company to
4 calculate fuel and purchase power costs. Absent this adjustment, these amounts
5 would not otherwise be reflected in the Company's retail cost of service.

6 **Q: What net amount of ancillary services purchases and sales has Evergy**
7 **Missouri Metro included in this case?**

8 A: The net amount of ancillary services purchase and sales included in this case is
9 based on the average annual actual costs and revenues incurred by Evergy Missouri
10 Metro for the 3-years ending August 2025. This adjustment is shown in
11 **Confidential Schedule HYF-4**⁵. These values will be updated to actual amounts
12 for the most recent 12-months at true-up.

13 **Q: What are SPP RNU charges?**

14 A: As a participant in the SPP IM, several miscellaneous charges and credits are
15 incurred for SPP to remain revenue neutral. The charges and credits that make up
16 the RNU charges include items such as rounding errors and inadvertent interchange
17 costs or revenue. RNU is distributed among the market participants as either a debit
18 (if SPP is short of funds to balance payments between participants) or a credit (if
19 SPP has collected more than needed to balance payments between participants).

20 **Q: Why is it appropriate that Evergy Missouri Metro include SPP RNU charges**
21 **in its calculation of revenue requirements?**

⁵ The amounts reflected in Confidential Schedule HYF-4 represent Evergy Metro. The appropriate allocation factors can be applied to the Evergy Metro values to obtain the portion applicable to Evergy Missouri Metro.

1 A: As a participant in the SPP IM, Evergy Missouri Metro is exposed to RNU charges
2 and credits. These charges and credits are not included in the model used by the
3 Company to calculate fuel and purchase power costs. As such, the net SPP RNU
4 charges have been included as an adjustment to Evergy Missouri Metro's model
5 results. Absent this adjustment, RNU-related charges and credits would not
6 otherwise be reflected in the Company's retail cost of service.

7 **Q: What net SPP RNU amount has Evergy Missouri Metro included in this case?**

8 A: The RNU charges included in this case are based on the average annual net amounts
9 for the 3-years ending August 2025. This adjustment is shown in **Confidential**
10 **Schedule HYF-4**⁶. These values will be updated to actual amounts for the most
11 recent 12-months at true-up.

12 **Q: What are the MINT line loss payments?**

13 A: These are payments made to AECI for transmission losses on the MINT line. AECI
14 provides coverage of the losses in-kind, and the Company reimburses AECI for its
15 share.

16 **Q: What amount of MINT line loss payments has Evergy Missouri Metro
17 included in this case?**

18 A: The line loss payments included are based on the actual payments for the 12-months
19 ending August 2025. This adjustment is shown in **Confidential Schedule HYF-**
20 **4**⁷. These values will be updated to actual amounts for the most recent 12-months
21 at true-up.

⁶ The amounts reflected in Confidential Schedule HYF-4 represent Evergy Metro. The appropriate allocation factors can be applied to the Evergy Metro values to obtain the portion applicable to Evergy Missouri Metro.

⁷See Id. FN 6.

1 Q: What are ARRs and TCRs?

2 A: Under the SPP IM, congestion charges arise from moving energy from generation
3 to load across a constrained portion of the transmission system. To manage and
4 hedge these congestion costs, SPP designed financial instruments called ARR_s and
5 TCR_s. Together, these instruments entitle the holder to receive, or be charged, a
6 stream of revenues or charges based on the actual hourly Day-Ahead Market
7 congestion price differences across a defined source-to-sink path.

8 Q: Why is it appropriate that Every Missouri Metro include ARR/TCR margins
9 in its calculation of revenue requirements?

10 A: ARR and TCRs exist to mitigate congestion costs that arise when there is a
11 congestion price differential between the generator's location and the location of
12 the load served. Because congestion costs are an inherent component of the
13 Company's cost of service, the value realized through ARR and TCR activity
14 should properly be applied to the calculation of revenue requirements.

15 Q: What amount has Evergy Missouri Metro included for TCR margins in this
16 case?

17 A: The TCR margins included are based on the annual average percent of actual
18 congestion costs recovered for the 3-years ending August 2025. This is applied to
19 the congestion costs calculated from the PROMOD model used to determine fuel
20 cost, purchase power cost, and off-system sales revenue. This amount can be found
21 in **Confidential Schedule HYF-4**⁸. This amount will be updated to the actual
22 amount for the most recent 12-months at true-up.

⁸ The amounts reflected in Confidential Schedule HYF-4 represent Evergy Metro. The appropriate allocation factors can be applied to the Evergy Metro values to obtain the portion applicable to Evergy Missouri Metro.

1 **V. ELECTRIC UTILITY FUEL AND PURCHASE POWER COST**
2 **RECOVERY MECHANISM**

3 **Q:** Regarding Evergy Missouri Metro's request for continued use of an FAC,
4 which portions of the Electric Utility Fuel and Purchased Power Cost
5 Recovery Mechanism filing requirements are you addressing in your
6 testimony?

7 **A:** I will address all or some of the portions of the FAC Rule 20 CSR 4240-
8 20.090(2)(A)15,16, 17, which address heat rate test results, long-term planning
9 process, and forecasted environmental investments, respectively.

10 **Q:** Has Evergy Missouri Metro supplied the heat rate test results and
11 documentation of the actual monitoring procedures for its generating units
12 required per 20 CSR 4240-20.090(2)(A)15.?

13 **A:** Yes. Heat rate test results conducted within the previous 24 months are provided
14 in **Confidential Schedule HYF-5**. The documentation of the actual monitoring
15 procedures is provided in **Confidential Schedule HYF-6**.

16 **Q:** Please provide your support for 20 CSR 4240-20.090(2)(A)16.

17 **A:** Requirement 16 requires the Company to provide:

18 Information that shows that the electric utility has in place a long-
19 term resource planning process; [...]

20 Evergy Missouri Metro has a long-term resource planning process in place. The
21 electric utility resource plan produced by the process is also known as an integrated
22 resource plan ("IRP"). An objective of this planning process is to identify the least
23 cost and preferred resource plans while maintaining adequate capacity reserves for
24 reliability.

1 Q: When was Evergy Missouri Metro's last IRP prepared?

2 A: Energy Missouri Metro prepared and filed its latest IRP updated report in March
3 2025 in No. EO-2025-0250.

4 Q: When will the next Evergy Missouri Metro IRP be prepared?

5 A: Under the current IRP rule, the next IRP is to be filed in March 2026.

6 Q: Please provide your support for 20 CSR 4240-20.090(2)(A)17.

7 A: Requirement 17 states:

If the electric utility proposes to include emission allowances costs or sales revenue in the proposed FAC and not in an environmental cost recovery mechanism, a detailed explanation of its emissions management policy, and its forecasted environmental investments, emissions allowances purchases, and emissions allowances sales; [...]”

At this time, Evergy Missouri Metro has no forecasted environmental investments that would impact emission allowance costs or sales revenues.

The explanation of the Company's emissions management policy and its forecasted emissions allowances purchases and sales required by 20 CSR 4240-20.090(2)(A)17. can be found in the direct testimony of Company witness Jessica Tucker.

VI. CONCLUSION

Please summarize your testimony.

In conclusion, this testimony described the development of Evergy Missouri Metro's normalized fuel and purchased power expenses and off-system sales revenues. It explained the Company's use of the PROMOD model for energy price forecasting and to normalize fuel costs, purchase power, and wholesale sales. Furthermore, the testimony detailed the necessary adjustments made to the

1 PROMOD results to accurately reflect items and expenses not captured by the
2 model, such as the RER program, and SPP Purchase Power Administrative fees.
3 Finally, this testimony provides the necessary support for the continued use of the
4 Fuel Adjustment Clause by addressing the specific FAC filing requirements.

5 **Q: Does that conclude your testimony?**

6 A: Yes, it does.

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

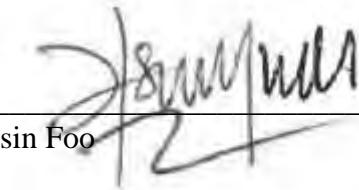
In the Matter of Evergy Metro, Inc. d/b/a Evergy)
Missouri Metro's Request for Authority to) Case No. ER-2026-0143
Implement A General Rate Increase for Electric)
Service)

AFFIDAVIT OF HSIN FOO

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Hsin Foo, being first duly sworn on his oath, states:

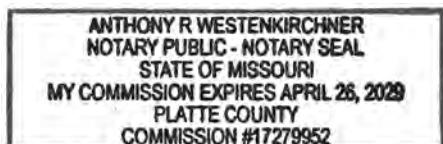
1. My name is Hsin Foo. I work in Kansas City, Missouri and I am employed by Evergy Metro, Inc. as Lead Quantitative Analyst-Generation Resources.
2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Evergy Missouri Metro consisting of twenty (20) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.
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.


Hsin Foo

Subscribed and sworn before me this 6th day of February 2026.

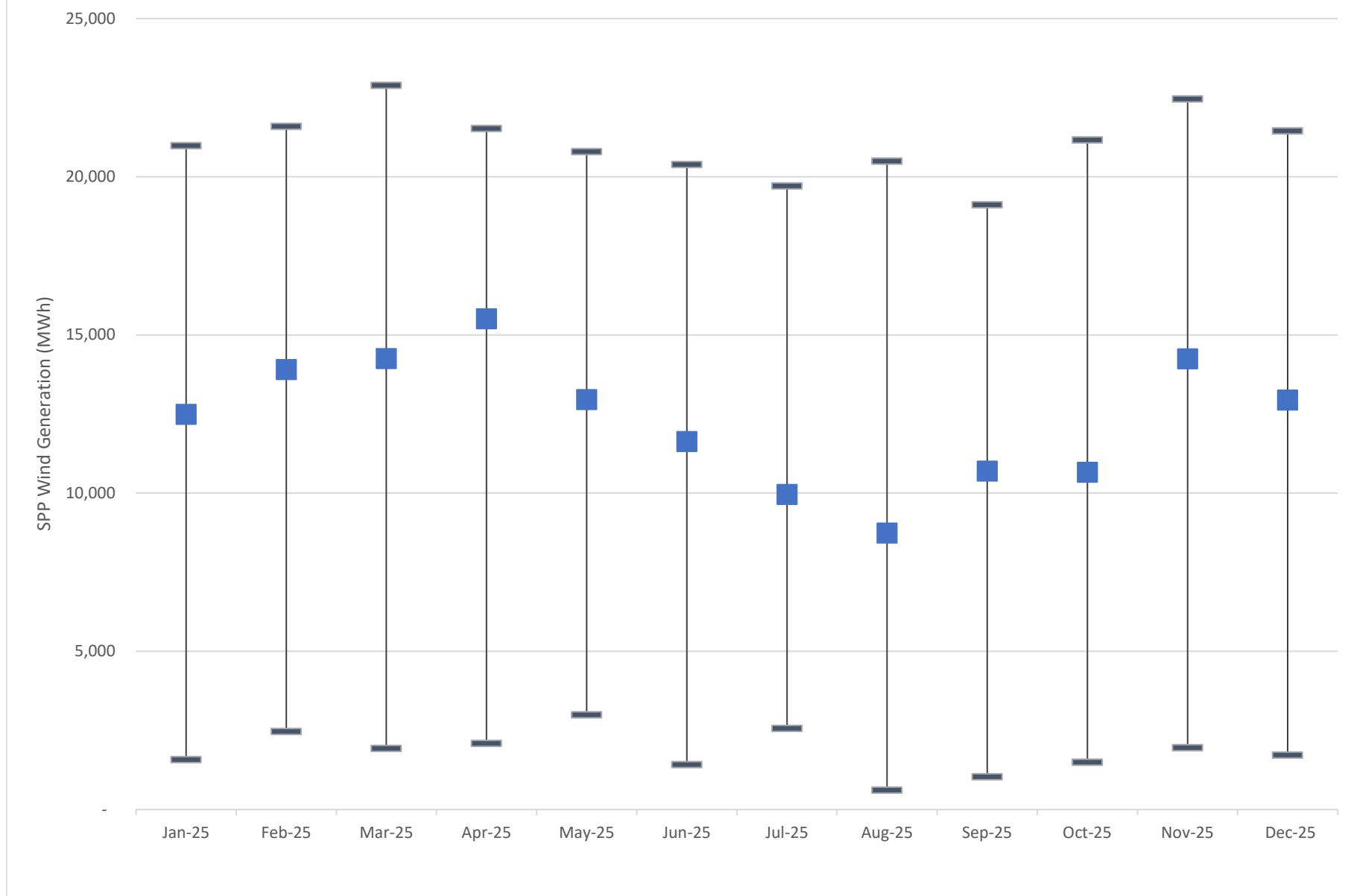

Notary Public

My commission expires: April 26, 2029



Volatility of Wind Generation in SPP Region

Minimum, Average and Maximum



**SCHEDULES HYF-2 THRU HYF-6
CONTAIN CONFIDENTIAL
INFORMATION
NOT AVAILABLE TO THE PUBLIC.**

ORIGINALS FILED UNDER SEAL.

Evergy Metro, Inc. d/b/a Evergy Missouri Metro

Docket No.: ER-2026-0143

Date: February 6, 2026

CONFIDENTIAL INFORMATION

The following information is provided to the Missouri Public Service Commission under CONFIDENTIAL SEAL:

Document/Page	Reason for Confidentiality from List Below
Schedule HYF-2	3 and 5
Schedule HYF-3	3 and 5
Schedule HYF-4	3 and 5
Schedule HYF-5	3 and 5
Schedule HYF-6	3 and 5

Rationale for the “confidential” designation pursuant to 20 CSR 4240-2.135 is documented below:

1. Customer-specific information;
2. Employee-sensitive personnel information;
3. Marketing analysis or other market-specific information relating to services offered in competition with others;
4. Marketing analysis or other market-specific information relating to goods or services purchased or acquired for use by a company in providing services to customers;
5. Reports, work papers, or other documentation related to work produced by internal or external auditors, consultants, or attorneys, except that total amounts billed by each external auditor, consultant, or attorney for services related to general rate proceedings shall always be public;
6. Strategies employed, to be employed, or under consideration in contract negotiations;
7. Relating to the security of a company's facilities; or
8. Concerning trade secrets, as defined in section 417.453, RSMo.
9. Other (specify) _____.

Should any party challenge the Company's assertion of confidentiality with respect to the above information, the Company reserves the right to supplement the rationale contained herein with additional factual or legal information.