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Issue: Rate Design Strategy, Tariff Modifications, Rule & Regulations, and CCOS
Witness: Bradley D. Lutz
Type of Exhibit: Direct Testimony
Sponsoring Party: Evergy Missouri Metro
Case No.: ER-2026-0143
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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2026-0143

DIRECT TESTIMONY

OF

BRADLEY D. LUTZ

ON BEHALF OF

EVERGY MISSOURI METRO

Kansas City, Missouri
February 2026

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DIRECT TESTIMONY

OF

BRADLEY D. LUTZ

Case No. ER-2026-0143

Q: Please state your name and business address.

A: My name is Bradley D. Lutz. My business address is 1200 Main, Kansas City, Missouri 64105.

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

A: I am employed by Evergy Metro, Inc. I serve as Director, Regulatory Affairs for Evergy Metro, Inc. d/b/a as Evergy Missouri Metro ("Evergy Missouri Metro"), Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West" or "EMW"), Evergy Metro, Inc. d/b/a Evergy Kansas Metro ("Evergy Kansas Metro"), and Evergy Kansas Central, Inc. and Evergy South, Inc., collectively d/b/a as Evergy Kansas Central ("Evergy Kansas Central") the operating utilities of Evergy, Inc. ("Evergy").

Q: On whose behalf are you testifying?

A: I am testifying on behalf of Evergy Missouri Metro ("EMM" or "Company").

Q: What are your responsibilities?

A: My current responsibilities are focused on rates, regulatory operations and customer issues, providing support and oversight for a wide range of regulatory work including determination of retail revenues, load analysis, rate design, class cost of service, tariff administration, compliance reporting, response to customer complaints, docket management system administration, general tariff administration, and relationship development for Evergy's regulatory activities in the Missouri and Kansas jurisdictions.

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

A: I hold a Master of Business Administration from Northwest Missouri State University and a Bachelor of Science degree in Engineering Technology from Missouri Western State University.

I joined Evergy, then Kansas City Power & Light, in August 2002 as an Auditor in the Audit Services Department. I moved to the Company's Regulatory Affairs group in September 2005 as a Regulatory Analyst where my primary responsibilities included support of our rate design and class cost of service efforts. I was promoted to Manager in November 2010 and was promoted to my current position in March 2020.

Prior to joining Evergy, I was employed by the St. Joseph Frontier Casino for two years as Information Technology Manager. Prior to the St. Joseph Frontier Casino, I was employed by St. Joseph Light and Power Company for nearly 14 years. I held various technical positions at St. Joseph Light and Power Company, including Engineering Technician-Distribution, Automated Mapping/Facilities Management Coordinator, and my final position as Senior Client Support Specialist-Information Technology.

Q: Have you previously testified in a proceeding before the Missouri Public Service Commission ("Commission" or "MPSC") or before any other utility regulatory agency?

A: Yes, I have testified multiple times before the Commission concerning tariff, class cost of service, and rate design topics as part of various recent proceedings. Additionally, I have testified multiple times before the Kansas Corporation Commission.

Q: What is the purpose of your testimony?

A: I will address the following topics in my testimony:

- Rate Design Strategy
- Reactive Demand Adjustment Modifications
- Lighting & Traffic Signal Tariff Modifications
- Rules & Regulations Modifications
- Class Cost of Service
- Service & Access Charge for Solar Subscription Rider
- Stand-by Rate Schedule Modifications
- Parallel Generation Rate Schedule Modifications
- Other tariff changes

1. Rate Design Strategy

Q: Please describe the strategy guiding the rate design proposals offered in this filing?

A: The Company continues to follow the general guidance offered by the Rate Modernization strategy formulated in 2022 and has recently chosen to focus on jurisdictional alignment. The rate design proposals offered in this case are aligned with proposals and commitments made in the 2024 Missouri West rates case, Case No. ER-2024-0189 and influenced by plans established as part of the last EMM rate case, Case No. ER-2022-0129.

Q: How does the Rate Modernization strategy guide rate design efforts in this case?

A: The Rate Modernization strategy is based on drivers that acknowledge the utility must balance many forces to increase overall customer satisfaction while recovering revenue requirements. Through the rate designs executed over several rate cases and refined with changes in regulatory outcomes, industry developments and customer desires, Evergy has sought to achieve the following rate objectives:

- Creating rates that are independent of end use requirements
- Bringing rate structures closer together across jurisdictions
- Enabling business growth
- Simplifying rates and increase pricing transparency
- Providing greater customer choice
- Increasing customer satisfaction
- Leveraging Customer Information System ("CIS") and Advanced Meter
- Infrastructure ("AMI") investments
- Developing price signals to increase grid efficiency

Although originally established in 2022, these objectives remain valuable to guide our rate design efforts.

Q: Has progress been made under these objectives?

A: Yes. Evergy has made continued progress to align tariffs between the EMW and EMM jurisdictions, supporting common operations within Missouri. Within the residential class, Commission orders to institute Time of Use ("TOU") rates designs accelerated steps to align these rates. Additionally, multiple programs have been established to provide customers direct access to renewable energy. In the last EMW rate case, initial steps were completed to achieve alignment of the non-residential rate structures.

Q: Why is jurisdictional alignment important?

A: Jurisdictional consolidation has long been a component of our rate design strategy but became a formal issue in the 2024 EMW rate case. Ultimately the Company agreed to host a series of workshops to share details about Company planning, respond to questions, and seek input from the Commission and stakeholders. As of the date of this testimony, three workshops and an on-the-record presentation have been held, with details memorialized under Case No. EW-2025-0220.

The Company has been clear since the 2018 merger of Great Plains Energy and Westar Energy that consolidation should be evaluated and pursued. Since then, Evergy has taken deliberate steps toward consolidation, and will continue to develop and execute on reasonable and appropriate consolidation plans. A preliminary rate consolidation plan was developed and filed with the Commission in 2020[1] and Evergy has continued to execute

[1] See *Notice of Filing Consolidation Study*, File No. ER-2018-0145/0146 (filed October 30, 2020).

on that plan ever since. Current Evergy efforts are focused on two primary goals, to achieve:

- Legal Entity Consolidation: Merging of corporate units within a holding company structure with consolidation of operating companies
- Rate Jurisdiction Consolidation: Refers to consolidation of rates and revenue requirements across jurisdictions

My focus and the focus of the rate design proposals offered in this case is to support Rate Jurisdiction Consolidation.

Q: Why is rate consolidation important?

A: There are a number of reasons why rate consolidation is important. Rate Consolidation will,

- Simplify and enhance customer experience
- Streamline Company operations such as billing and customer support
- Simplify regulatory processes
- Support legal consolidation

Simply put, rates and rate structures are a foundational aspect of how customers interact with their utility. Steps taken to make rates and rate structures consistent will provide clear benefit and support to how Evergy provides service to its customers.

Q: What are the general steps expected to achieve rate consolidation?

A: Evergy has identified three steps to achieve rate consolidation,

- Step 1: Rate Structure Consolidation: refers to the consolidation of line items on a customer's bill (i.e., the line items across consolidated jurisdictions will be identical and measured the same way). While line items on customers' bills align, actual prices customers pay between jurisdictions may continue to be different.
- Step 2: Revenue Requirement Consolidation: combined revenue requirement as a common target to establish consolidated rates, requiring separate and combined cost of service studies.
- Step 3: Price Consolidation: of rate jurisdiction consolidation refers to the actual rate that customers pay being aligned across jurisdictions.

Evergy is within Step 1 and proposals made in this case further support structural alignment between Evergy Missouri West and EMM.

Q: How does Evergy plan to achieve structural alignment?

A: Evergy has established a desired target structure for the residential and non-residential rates and has identified steps for the EMM and EMW jurisdictions to make progressive movement toward these target structures in the respective rate cases. If successful within these respective cases, the rate structures will be sufficiently aligned to move to step 2, and step 3, the revenue requirement and price consolidation steps.

For the residential rates, the current TOU options and Standard Tiered rate represent the target structures and the Missouri jurisdictions are largely aligned now. For the most widely used non-residential rates, Evergy has identified the four-part rate structure used at EMM, revised to remove the Hours-Use energy charge, as the target structure. For lighting, the current Municipal Streetlighting, Unmetered Private Area Lighting, and Off-Peak Lighting tariffs are largely aligned now with continued clean-up of legacy lighting types expected to complete the alignment.

Q: How did the Company approach preparations for this case?

A: As mentioned previously, the Company was mindful of the commitments and outcomes from its recent rate cases and workshops and sought to include those now for EMM, particularly the EMW case completed in 2024 and the Residential TOU Workshops. Notable examples include the commitment to offer customer counts based on customer charge count and service agreement count and the commitment to provide net margin rates at the time of direct testimony. Further, the Company sought to accommodate feedback from Staff for more detailed data and support for proposals. A prime example is the additional work to provide weather normalization at a sub-class level instead of class normalizations and steps to move toward on-peak demand charges. Another step taken by the Company is exemplified by the work to incorporate Large Load elements in the direct filing. Despite having no customers in the test year, transitional steps were taken in the preparation of revenues and CCOS studies to acknowledge this developing customer segment. Finally, it is notable that the Company is also taking steps to reinforce alignments in rate structures between the state jurisdictions. If achievable, a high degree of rate structure alignment across the entire Evergy footprint can provide benefit to all customers. In general, the Company maintained a holistic perspective in preparing this case and is hopeful these steps are helpful now and in future cases.

Q: What are the Company rate design proposals for this case?

A: The Company is making a series of proposals with most directed toward the non-residential customer classes. The proposed rate design changes include the following,

- 15-minute Demand Interval – Currently, meters for EMM non-residential customers measure demand based on 30-minute intervals to establish the billing demand to be used for monthly billing. EMW relies on 15-minute intervals. This change will align the approaches under the 15-minute interval. The 15-minute interval is preferred as it offers better recognition of demand consumptions and offers improved granularity to the data for analysis.
- Demand Thresholds – Within the Company's current rates and rate classes, the designs include minimum demand values to differentiate the rate pricing between customer classes, but customers are free to

choose any rate for service. As a result, customers intentionally or unintentionally select rates that are not optimal for their load condition and will have materially different loads as compared to other customers in a given class. This practice becomes problematic when rate design changes are applied to a class as the impacts for these "misplaced" customers can be materially different than a typical customer for that class. The Company is proposing demand-based thresholds, referred to as "Bright Lines", to limit customers to the respective classes based on their demand usage. This approach has been utilized successfully in the Evergy Kansas Central jurisdiction. We believe these thresholds will be useful in the future as we seek to align rate classes between EMM and EMW.

- Hours-Use Replacement – Hours-Use pricing is a ratemaking technique that seeks to recognize the relationship between demand and energy consumption within the energy rate component. Essentially, the method identifies efficient energy use and rewards more efficient users with a lower price per kWh of usage. Although considered an economic means of energy pricing, since the elements of the Hours-Use calculation are not known until the bill is calculated, a customer cannot anticipate the pricing associated with their energy use. This makes it difficult for customers to take proactive action concerning their consumption. The Hours-Use structure is being considered for change because of feedback received from customers seeking a clearer view of their energy pricing. Within this case, the Company is proposing to replace the Hours-Use structure with flat kWh pricing that include a peak period adder and an off-peak credit, similar in structure to the residential Peak Adjustment rate. The proposed design will also include provisions for an on-peak demand charge, moving away from the non-coincident peak method used currently.

- Optional TOU Rate – The proposed optional TOU rate is a three-period, four-part TOU rate that will be available to non-residential customers. The four-part design consists of a customer charge, facilities charge, on-peak demand charge, and energy charge. The energy charge is in the form of a three-period design with an "on-peak" period from 3 pm to 7 pm on non-holiday weekdays in summer months, a "super-off-peak" period from midnight to 6 am every day throughout the year, and an "off peak" period for all other hours of the year.
- Reactive Demand Changes – Changes will be made to the application of the Reactive Demand Charge within the non-residential rates. This will align with the rate designs established in EMW. This topic is explored in more detail later in this testimony.

Please see the Direct Testimony of Company witness Graham Jaynes for details about the application of these proposals to the tariffs as well as details concerning other rate design proposals.

Q: Are these proposals intended to support rate consolidation?

A: Yes. Collectively, if approved, these changes would provide a major step to alignment of the EMM and EMW rate structures. Some proposals, such as adoption of a 15-minute demand interval, rate eliminations, and reactive demand adjustments are steps that will bring EMM into structural alignment with EMW now. Other changes, the demand thresholds and Hours-use replacement specifically, are changes Evergy has committed to make in a future EWW rate case and has proposed identical structures here for EMM in an expectation of that future EMW rate case. The remaining element, proposal of an Optional Time of Use rate for non-residential customers, was contemplated in the EMW case in response to customer interest and approval of a similar optional rate in the Evergy Kansas Central jurisdiction.

Q: Will the EMM and EMW rate structures be aligned if these proposals are approved?

A: No. Additional steps will be required to bring the EMW rates into structural alignment.

Q: What additional steps are contemplated for EMW rates?

A: Evergy identified the following steps for non-residential rate designs in the EMW[2]

1. Align Customer Charges and Facilities Charges as proposed in this case.
2. Transition away from the Annual Based Demand[3] structures in place for the Company's non-residential rates.
3. Implement demand-based thresholds for class designation, including a proposal concerning a Medium rate class.

[2] ER-2024-0189 Rebuttal Testimony of Bradley D Lutz, page 9, line 7

[3] Annual Based Demand ("ABD") is a rate design approach that provides a pricing discount for demand and energy usage is less than a customer's maximum measured demand established during the four summer billing months. For Evergy, ABD structures were only used in the Missouri West jurisdiction and were partially eliminated in ER-2024-0189.

4. Implement an optional, time-variant rate.

5. Transition away from the hours-use mechanism for energy pricing.

6. Transition to coincident peak-based demand pricing.

The Stipulation associated with the 2024 EMW rate case contained commitments to propose rate design changes to address 1, 2, 3, and 5. Depending on the outcome of this case, 4 and 6 could be proposed for EMW as they are proposed here.

Q: Are additional steps contemplated for EMM rates in the future?

A: If these various proposals are approved, the bulk of the planned rate design changes will be completed, leaving only minor refinement before being ready for jurisdictional consolidation. If any proposals are rejected or other proposals approved that were unanticipated, some further adjustment may be needed to accommodate.

2. Reactive Demand Adjustment Modifications

Q: Please describe your testimony concerning Reactive Demand.

A: Reactive demand is the power used to sustain the electromagnetic field in inductive and capacitive equipment. All customers contribute to reactive demand, but large customers contribute disproportionately due to large motors, pumps, and equipment commonly used by their operations. Informal conversations with, and testimony[4] by Staff have raised questions about reactive demand and if changes in regional generations fleets should require changes to rate design approaches related to reactive demand. In the 2024 EMW rate case, File No. ER-2024-0189, I addressed this topic and under my analysis determined

[4] See Direct Testimony of Sarah Lange, File No. ER-2023-0129/0130, page 5, line 1, page 24, line 31, and page 64, line 24.

the approach used at EMW to recover reactive demand costs was reasonable. I am proposing to align the EMM approach with the approach currently in place at EMW.

Q: What was your analysis and recommendation for EMW from File No. ER-2024-0189?

A: With the help of engineers, analysts, and technical specialists in Evergy groups responsible for planning and ensuring power quality for its systems, (specifically, Operations Analytics, Distribution Planning, Operations Technology, Transmission Planning, and Central Design), I have learned that Evergy addresses reactive demand[5] at three primary levels, the transmission grid, the distribution grid and the customer level.

As for cost recovery, a reactive demand adjustment charge is included in the design of Evergy Missouri West's Large Power Service rate schedule.[6] Within that schedule, a charge per kVAr is made for each kVar by which the maximum reactive demand is greater than fifty percent (50%) of customer's maximum kW demand for that month. The reactive demand adjustment will be based on the ratio of the customer's maximum monthly fifteen (15) minute reactive demand in kVar to the customer's maximum kW demand for the billing period. With this specific charge a portion of estimated revenue requirement related to capacitor plant is recovered directly from the Large Power class with the remainder recovered from all customers through recovery of the general revenue requirement.

[5] For the purpose of this testimony, I will refer mainly to reactive demand or reactive power. The Company manages reactive demand as part of its overall power quality efforts. These efforts also address grid frequency, voltage, harmonics, and losses.

[6] A Reactive Demand Charge is also part of the Large Load Power Service rate, Schedule LLPS approved in EO-2025-0154 (compliance tariff pending).

Q: Are these conditions equally applicable to EMM?

A: Yes. However, the Reactive Demand Adjustment is a part of the Medium General, Large General, and Large Power rate schedules for EMM.[7]

Q: What changes are proposed for EMM to align with this analysis?

A: I recommend the reactive demand adjustment be removed from all classes except for the Large Power Service class which includes Large Power Service, Schedule LPS and Large Load Power Service rate, Schedule LLPS. Company witness Graham Jaynes discusses how the Reactive Demand Adjustment removal was accomplished within the rate designs proposed in this case.

3. Lighting & Traffic Signal Tariff Modifications

Q: Please describe your testimony concerning Lighting.

A: My testimony will detail proposed changes to the format of the Private Unmetered LED Lighting Service tariff and the Municipal Street Lighting tariff and the proposed addition of two new Municipal Street Lighting options for service to customers. I will also address proposed changes to the Municipal Traffic Signal Control Service schedule and elimination of the Municipal Light Emitting Diode (LED) Program, Schedule ML-LED. My testimony will complement the pricing testimony of Company witness Graham Jaynes.

Q: How is the Company proposing to change the format of the Municipal Street Lighting tariff?

A: In reviewing the Municipal Street Lighting tariff structure in the four Evergy jurisdictions, the Company uses different structures to present the lighting rates. This variation contributes to Company administrative inefficiencies and possibly customer confusion. To

[7] Id.

address these concerns, the Company proposes adopting a new format for this service. The changes proposed for Evergy Missouri Metro have been approved for EMW in File No. ER-2024-0189 and if accepted in this filing, will be proposed for the remaining Evergy jurisdictions. Concerning the specific format changes, the Company is proposing to reorganize the layout of the current elements and implement a cleaner, table-based presentation.

Additionally, the Company is proposing to consolidate sheet 36 of the Municipal Street Lighting Service, Schedule ML with sheet 35 of the Municipal Street Lighting Service, Schedule ML. At one time, Sheet 36 contained a series of lighting options for customer-owned street lighting. Over time these options were no longer used and were eliminated. Now, only two options remain for this rate code and it makes sense to consolidate them with the other 1MLCL rate code options found on sheet 35 section and remove the potentially confusing duplication of terms.

Q: Is the Company proposing anything new for the Municipal Street Lighting tariff?

A: Yes. The Company is proposing two new light types, Class 3 and Class 6, which are light types used in other Evergy jurisdictions and would fill in gaps for lumen output in the existing light options. Other new or significant changes to the tariff include:

- Revised Light Class code designations, replacing the alphabetic codes with numeric codes. Codes that will be the same across all Evergy jurisdictions.
- More detailed statement of Availability
- Explicit Lumen Output ranges
- Updated kWh consumption amounts
- Definitions for key terms
- Detail concerning Installation, Maintenance and Construction

Q: How were the prices developed for these two new rates?

A: Since the Class 3 and Class 6 lights are being introduced into existing pricing for adjacent light options, the Company set the pricing for Class 3 lights at approximately the midpoint between Class 2 and Class 4 pricing. For Class 6 the Company proposed pricing greater than Class 5 pricing by the equivalent pricing differential between Class 4 and Class 5. The new light types and the approach used for pricing is consistent with the approach approved in ER-2024-0189 for Missouri West.

Q: Earlier you mention changes to the Company Rules and Regulations related to Municipal Street Lighting. What changes are proposed there?

A: Within current Section 15.08, found on Sheet 1.51[8], the Company is proposing one change, viewed as a clarification. In the terms for Changes and Removals, the Company proposed to add,

> "If the street light has been installed for a period of less than fifteen (15) years,"

This addition will be made to the beginning of the existing sentence, "*the City shall reimburse and pay to the Company the Company's cost of labor, transportation and materials incurred for such change (including, without limitation, applicable overheads, insurance and taxes).*" This revision will establish a limit to the Municipality's obligation

[8] For the proposed Book #3, the revision is found in Section 12.08 on Sheet R-12.02.

to reimburse the Company and will align the EMM Rules with the same change approved for EMW in ER-2024-0189.

Q: What changes are being proposed for the Municipal Traffic Signal Control Service schedule?

A: The Company is proposing to freeze this schedule, to no longer offer this service to new customers. Use of this schedule has been in decline over the years and currently only two Municipalities are using this service. We have been in discussions with these Municipalities, and they are not yet ready to take over maintenance of these facilities, so the Company proposes to freeze this schedule until such time the traffic signals served may be converted to metered service and this schedule eliminated.

Q: Why is the Company proposing to eliminate the Municipal Light Emitting Diode (LED) Program, Schedule ML-LED?

A: There are no longer any customers receiving service under the schedule and LED-based Municipal Lighting has been integrated into the Municipal Street Lighting Service, Schedule ML. Schedule ML-LED was established as an LED Pilot Program to support the Mid-America Regional Council ("MARC") and their efforts to promote efficient street lighting. MARC received a grant from the US Department of Energy to retrofit existing streetlights with new high efficiency street light luminaires through a three-year grant period, ending in July 2013. The objective of the Smart Lights for Smart Cities project was to deploy approximately 5,300 lights, utilizing different technologies from multiple vendors in 25 different cities, defining specifications, testing performance and measuring public opinion of the lights. This schedule remained open to support these lights as long as they continued to exist in the field.

Q: To confirm, eliminating Schedule ML-LED will not impact the availability of LED lighting to EMM customers?

A: Correct. In EMM, LED lighting for Municipal customers is offered through Municipal Street Lighting Service, Schedule ML. LED lighting for non-Municipal customers is offered through Private Unmetered LED Lighting Service, Schedule PL.

4. Rules & Regulations Modifications

Q: What changes are proposed for the EMM Rules & Regulations?

A: The Company is proposing a comprehensive update to the format and layout of its General Rules & Regulations ("Rules"). As part of the revision the sections and section numbering will be changed. Further, the content of the sections will be revised to establish terms that will be largely aligned with the language in place at EMW. Said another way, the bulk of proposed change of the EMM Rules will be accomplished by adopting the EMW Rules. To ensure important EMM content is not lost, a section-by-section review was completed and the language adjusted to retain these EMM details. If the revised Rules are approved in this case, in a future EMW rate case we expect to propose adoption of these consolidated Rules for that jurisdiction. It is expected that these steps will result in aligned Rules, suitable to support consolidation of the EMM and EMW jurisdictions.

Q: Are these revisions being proposed as part of the current EMM Book #2?

A: No. Given the magnitude of the change as well as the change of the sheet numbering, this revision is being proposed as a new book, withdrawing Book #2 and proposing approval of Book #3. The Company previewed these changes with Staff and discussed the Book filing with the Commission Data Center in an effort to account for what will be needed to streamline and support this comprehensive change. Both Staff and the Data Center were helpful in offering guidance as to the steps to complete this change. For increased transparency, the Company is also describing these approaches in the cover letter that will accompany the filing of this case.

Q: Is the Company proposing changes to the language of the Rules?

A: Yes. Within this alignment proposal the Company will tend to utilize the EMW language for the respective sections, particularly where the EMW language was determined to be otherwise equivalent to the EMM language. In situations where the EMM language was unique, it was retained. There are a number of instances where material revisions are proposed. In the following testimony, each material revision is explored in more detail.

Q: Beyond the adoption of EMW wording, is the Company proposing to adopt any entire subsections of the EMW Rules that are not part of the EMM Rules today?

A: Yes. The Company proposes adopting two sections, both within the new Section 4, Installations. First, the Company seeks to adopt subsection 4.05 addressing Motor Installations and subsection 4.09 addressing Moving Structures. Both subsections offer increased detail concerning the respective topics. The content has been examined, and the Company believes these terms align with other provisions in the Rules and will ultimately be helpful to improve operational alignment with EMW.

Q: Is the Company taking any additional steps to detail and support this proposal?

A: Yes. Beyond this testimony and the proposed Book #3 version, the Company has prepared workpapers in the form of the current Book #2 Rules annotated with document comments to help explain the edits and the reconciliation between the Rule Book versions. In this situation, red-line versions, files that show the proposed changes relative to the original file, will have little benefit to communicate the proposed changes. Because nearly all aspects of the existing Rule Book #2 will be relocated or otherwise revised, the entire file will appear as a proposed change. This approach was influenced by the conversations with Staff and the Data Center mentioned earlier in this testimony.

Q: Are any sheets of Book #2 currently before the Commission as part of any other filing?

A: Yes. There are two filings that include sheets from Book #2, Case No. EE-2025-0084[9] (Tracking No. JE-2026-0016) and Case No. EO-2025-0154[10] (Tracking No. JE-2026-0103) that are not yet effective. For JE-2026-0016, the tariffs were approved[11] but have an effective date of March 12, 2026. For Tracking No. JE-2026-0103, the tariffs are before the Commission but have not yet been approved. To facilitate the filing, the Company prepared the workpapers supporting the withdrawal of Book #2 based on the filed versions and have prepared the Book #3 version based on our proposed final placement of these sheets.

Overall Structure and Major Terms

Q: Please describe the structural changes proposed for the Rules & Regulations?

A: The Rules for EMM and EMW carry similar content and are structured in a similar way. The following table, Table 1, identifies the current presentation of the two jurisdictions.

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[9] *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 Request for a Waiver of Various Chapter 13 Regulations* (Knock & Collect).

[10] *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.*

[11] EE-2025-0084, *Order of Correction*, Issued September 12, 2025 (https://efis.psc.mo.gov/Document/Display/849208).

Table 1

Current Rule Section Structures[12]	
EMM	**EMW**
Territorial Description	Definitions
Definitions	Service Agreements
Service Agreements	Supplying and Taking of Service
Supplying Electric Service	Installations
Taking Electric Service	Metering
Multiple Occupancy Premises	Meter Reading, Billing and Complaint Procedures
Metering	Extension of Electric Facilities
Choice and Application of Rate Schedules	Emergency Energy Conservation Plan
Billing and Payment	Promotional Practices
Extension of Electric Facilities	MEEIA Cycle 3 Programs
Underground Distribution Policy	Compliance with Rules and Regulations
Agreements	Summary of Types and Amount of Charges Allowed
Mobile Home Service	Municipal Street Lighting Service
Municipal Street Lighting Service	MEEIA Cycle 2 Programs
Municipal Traffic Control Service	
Emergency Energy Conservation Plan	
Average Payment Plan	
Separate Metering Variances	
MEEIA Cycle 3 Programs	
MEEIA Cycle 4 Programs	
Promotional Practices	

Q: Why did the Company choose to align the EMM Rules with EMW Rules instead of the other way around?

A: As an initial step, the Company examined and compared the two structures. The more concise layout of the EMW structure, as well as the observation that EMW Rule language was generally more descriptive, compelled us to select the EMW Rules as the basis.

Q: What is the proposed final structure for the new Book #3?

A: The Company proposes the following structure, detailed in Table 2, for its new Book #3.

[12] For EMM, the Rules and Territorial Descriptions are found in Book #2 while the Rate tariffs are found in Book #7. For EMW, the Territorial Description, Rules, and Rates are all in Book #1.

Table 2

Proposed Rules - Book #3	
Proposed Section	**Content**
Section 1	Definitions
Section 2	Service Agreements
Section 3	Supplying and Taking of Service
Section 4	Installations
Section 5	Metering
Section 6	Meter Reading, Billing, and Complaint Procedures
Section 7	Extension of Electric Facilities
Section 8	Grid Interconnection, Operation and Access Policy
Section 9	Emergency Energy Conservation Plan
Section 10	Customer Support Programs
Section 11	Missouri Energy Efficiency Investment Act Programs - Cycle 4
Section 12	Municipal Street Lighting Service
Section 13	Municipal Traffic Control Signal Service
Section 14	Separate Metering Variances
Territorial Description	

Q: Are there material revisions that should be explained in more detail?

A: Yes, the following revisions are considered material or represent new language proposed for inclusion to the Rules & Regulations, and I will speak to each.

- Convert Promotional Practices to Customer Support Programs
- MEEIA Programs
- Expansion of the Definitions Schedule
- Deletion of the Agreements Schedule
- Creation of Interconnection Policy Section
- Revised terms for Multiple-Occupancy & Redistribution
- Modification to Choice and Application of Rates

Promotional Practices Conversion to Customer Support Programs

Q: Please describe what content is currently contained in the Promotional Practices section?

A: The Company has utilized Section 23 in its current Rules as its Promotional Practices section. In a recent update of the Company's MEEIA Cycle 4 tariffs, some of the programs were assigned into Section 23.

Q: Please describe the revision to Promotional Practices?

A: The Company is proposing resolve this comingling by moving the MEEIA-related tariffs into the proposed Section 11 of Book #3 with the other MEEIA programs and renaming the "Promotional Practices" to "Customer Support Programs" to become Section 10 of Book #3. Within this new Customer Support Programs section, the Company will retain all non-MEEIA customer programs, including Rehousing Low-Income Pilot Program and Critical Needs Program. The Company will also move the Income Eligible Weatherization and Economic Relief Pilot Program from the Promotional Practices section of Book #7, the Company Rates, into this Customer Support Programs section.

Q: Is the Promotional Practices designation still needed?

A: No, not within the Rules and the new proposed Book #3. The Code of State Regulation ("CSR") defines Promotional Practices as,

> [A]ny consideration offered or granted by a public utility or its affiliate to any person for the purpose, express or implied, of inducing the person to select and use the service or use additional service of the utility or to select or install any appliance or equipment designed to use the utility service, or for the purpose of influencing the person's choice or specification of the efficiency characteristics of appliances, equipment, buildings, utilization patterns or operating procedures.[13]

[13] 20 CSR 4240-14.010 General Provisions, paragraph (6)(L).

None of the programs reflected in the Company Rules meets this definition, so the Company will take this opportunity to remove the heading from use.

Q: Why is this change needed?

A: This change will resolve some placement inconsistencies and will align like programs under a new, more appropriate header. As the sections are labeled and tariff placed now, there is potential for creating customer confusion.

MEEIA Programs

Q: Please describe the revision to the MEEIA Programs?

A: The Company proposes to eliminate the tariff sheets associated with MEEIA Cycle 3, as the applicable Program Period concluded on December 31, 2024. Because the Cycle 3 programs have ended, all incentives associated with those programs have likewise expired and are no longer available to customers. Retention of the Cycle 3 tariff provisions is no longer necessary.

In addition, the Company proposes to eliminate the remaining seven tariff sheets associated with MEEIA Cycle 2, which expired on March 16, 2019, along with any related incentives. The majority of the MEEIA Cycle 2 tariff sheets were previously eliminated as part of the Company's MEEIA Cycle 4 filing submitted on October 15, 2024. Removal of the remaining Cycle 2 tariff sheets will further streamline the tariff and ensure that it accurately reflects only those programs that are currently in effect.

Q: What section of Book #3 will be used to house the MEEIA Programs?

A: The Company proposed to use Section 11 for this purpose.

Definitions

Q: Please describe the revision to the Definitions Schedule?

A: The list of definitions in the EMW tariff will, for the vast majority of the schedule, be adopted in the EMM Definitions Schedule. Two definitions listed in the EMW Schedule will not be adopted in the EMM tariffs as they are not considered essential by the Company, and thirteen definitions not found in the EMW tariffs will be adopted in the new EMM tariffs.[14]

Q: Why is this change needed?

A: The two definitions that were not brought over from EMW are Extension Agreement and Residential Service. As the term extension agreement is defined in the EMW tariffs and it is referred to throughout EMM tariffs and the Code of State Regulations as a pay or payment agreement. It also could be confused as the term extension agreement is used in the Extension of Electric Facilities tariff. The term Residential Service is defined in the Residential Rate tariff schedules. The additions of the thirteen current EMM definitions were made to add clarity and completeness to key words found throughout the Rule & Regulation tariffs.

Q: Why is this deletion of the Agreements schedule needed?

A: The language in this schedule is covered in other areas of the proposed EMM tariffs. EMM section 12.01 Primary - Secondary Electric Service Agreement – the contractual obligation language in this section is covered in the individual rate schedules. EMM section 12.02 Indemnity Bond - Payment Security language for company is addressed in Rules &

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[14] Missouri West definitions not adopted in Missouri Metro: 1. Extension Agreement, 2. Residential Service. Current Missouri Metro definitions adopted into proposed Missouri Metro tariffs: 1. Electric Service 2. Service Territory 3. Building 4. Customer's Installation 5. Point of Delivery 6. Meter Installation 7. Service Agreement 8. Billing Error 9. Fraud 10. Meter Error 11. Responsible Party 12. Tampering 13. Time of Application.

Regulations section 2.04, Deposit and Guarantees of Payment. EMM section 12.03 Private, Unmetered Protective Lighting Service Installation-Service agreement terms are covered in the Rates tariff schedule Private Unmetered Lighting Service (Frozen) and in the Private Unmetered LED Lighting Service rate tariff.

Grid Interconnection Policy

Q: Please describe the proposed Grid Interconnection, Operation, and Access Policy?

A: The Company is proposing to establish a distinct section of its Rules to address interconnection. This section, Section 8 of Book #3, will contain all interconnection-related terms present in the current General Rules & Regulations and provide a structure for future terms as this element of service to customers continues to develop.

Q: Why is this change needed?

A: When many of the current Rules & Regulations were established in the past, interconnection of customer generation was a rare occurrence. Now it is common to have customer generation at all levels of customer, rooftop solar on a residential customer premise all the way to utility scale generation used in a cogeneration context. This distinct policy section will help support customer interaction and understanding of roles and responsibilities under interconnection. We believe that ultimately, this will support the growing utilization of customer generation.

Q: Beyond the relocation of existing rules to this Section, does the Company propose any revision or addition of new terms?

A: Yes, other changes are proposed. First, definitions will be established to align understanding of new terms being used around customer generation. Next, the Company proposes adding detail around the applicable codes, statutory and administrative regulations, and Company interconnection standards within this new Section. Many of these details are preexisting but have not been concisely delineated in the General Rules & Regulations before now. The Company proposes devoting a portion of this new section to Grid Service Participation, the requirements developing at the FERC and RTO level to address customer participation in the energy markets. Much is yet to be resolved in this area, so the steps taken now are intended to establish a framework that can expand as details are formalized. Finally, the Company proposes correcting the rate defined for interconnection studies for systems larger than 5MW. The current pricing is a base amount plus $1 per kW. The pricing should be $0.10 per kW. This error was discovered recently and was identified as an inadvertent mistake. Since this language was approved, it has been our practice to bill customers the base plus $0.10 per kW amount. This revision will align the tariff with the intended pricing.

Q: Does this proposed section create any additional restrictions on customer generation interconnection?

A: No. All interconnection requirements remain unchanged. Within the Grid Service Participation section, new terms will define roles and responsibilities and basic terms governing the interactions of the Company and the customer.

Multiple-Occupancy & Redistribution

Q: Please describe the Company's Rules on Multiple-Occupancy & Redistribution.

A: The Company's basic metering rules require individual metering for each customer.[15]

[15] General Rules and Regulations, Section 5.01, Individual Metering for Separate Premises, Sheet 1.18A (Current Book #2)

However, other rules establish provisions that will allow for redistribution.[16] Specific to multiple-occupancy buildings, the Company may allow redistribution where the operation of certain types of multiple occupancy premises, either in whole or in part, makes it impractical for the Company, in its judgment, to separately meter and supply electric service to each occupant as a Customer of the Company. Such exceptions may include:

- An operation catering predominately to transients, such as hotels, motels, and hospitals;
- An operation where the individual dwelling quarters are not equipped with kitchen and bathroom facilities, such as rooming houses, dormitories, retirement communities, orphanages and charitable institutions;
- An operation of a building used essentially for general office or commercial purposes where the separate premises leased to office or commercial tenants are adjustable and subject to rearrangement or relocation;
- An operation of a transient mobile home court where electric service is supplied by the Company to the operator, as the Customer of the Company, pursuant to an applicable rule or rate schedule of the Company.

Recently, other types of customers have requested the ability to redistribute in other situations, relying on exemptions provided for in the CSR.[17] In these situations, the customer has relied on age of the building, historic elements, or other factors to receive approval for redistribution.[18] These cases highlighted a need to update the Company Rules and better align with the role of the Variance Committee also defined within the CSR[19].

Q: What is the purpose of the proposed change to these rules?

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[16] General Rules and Regulations, Section 5.03 (b), Resale and Redistribution, Sheet 1.19 "*Redistribution means the furnishing of electric service by the Customer (i) to another building occupied by the Customer and located on the same premises of the Customer but used by the Customer for a separate business enterprise, or (ii) to separate premises occupied by another person, whether or not such premises are owned, leased or controlled by the Customer, without making a specific or separate charge for the electric service so furnished*"
[17] See 20 CSR 4240-20.050 Individual Electric Meters - When Required found at: https://www.sos.mo.gov/CMSImages/AdRules/csr/current/20csr/20c4240-20.pdf. Exemptions are found in paragraph (4).
[18] Case No. EE-2025-0158 and EE-2024-0335
[19] 20 CSR 4240-20.050 (5)(C)

A: In general, the Company seeks to establish improved and updated definitions of the terms around redistribution. These improved terms will allow more consistent and transparent administration of redistribution requests. These revisions should also provide a clear handoff to the Variance Committee and the authority it has under the CSR.

Q: What changes are proposed?

A: The Company is proposing a number of revisions and new language to effectuate this update. These will appear in Section 5.02, starting on sheet R-5.02 of the proposed Book #3.

- Proof of rent inclusion – The Company proposes to add the following language,

  > If requested by the Company, the owner, lessee, or operator of such multiple occupancy premises where redistribution is permitted shall provide evidence of the rent inclusion. If the rent inclusion fails to meet the terms of this section the owner, lessee, or operator of such multiple occupancy premises where redistribution is permitted shall implement suitable such rent inclusion immediately.

  This language will establish an expectation for the Customer that rent inclusion is important and must be substantiated. The Company currently has limited authority to monitor this important requirement.

- Expanded terms for Renovation – The Company proposes to add new and updated language detailing the role of renovation of any building in determining the applicability for redistribution. Specifically adding,

  > Where a building presently receiving electric service through a single meter, regardless of building age, undergoes renovation to the extent that the cost of such renovation is fifty percent or more of the value of the building, then the building shall not be eligible for redistribution. When redistribution is requested and before receiving permanent service, the Customer shall provide the Company with an estimated cost of renovation and a current estimate of building value. Should such information not be

> available or is deemed unreliable by the Company, the Company shall exercise reasonable judgment to determine if renovation could reasonably support individual metering.

The threshold of fifty percent or more of the value of the building is not new. The application of this threshold has been clarified.

- Adding terms for Change of Ownership – The Company proposes to add new language to address ownership changes. Specifically adding,

> Should a building presently receiving electric service for redistribution change ownership, redistribution will only be allowed if the end use and purpose of the building remains consistent with the conditions supporting the original approval of redistribution. Should the end use and purpose of the building change, the Company shall evaluate if the building qualifies for redistribution based on its current conditions.

The Rules are currently silent on this detail.

- Adding terms detailing Considerations – The Company proposes to add new language detailing the context and key elements that underlie the Company consideration of redistribution. Specifically adding,

> In determining if redistribution will be allowed, the Company shall assess the request in the context of all factors impacting the electric service. Presence of mixed residential/non-residential loads, variations in end use, customer generation, or sizable public service load (see section 5.02 (F)) are detrimental to approval for redistribution. Cost or project delay to provide individual metering shall not be a factor in the decision to allow redistribution. The utilization of renewable energy resources shall not automatically allow redistribution.

- Adding terms to describe Variances – The Company proposes to add new language detailing the process to seek a variance. Specifically adding,

> Should the Company deny a request for redistribution, the requestor may seek a variance from this Rule and Commission Rule 4 CSR

> 4240-20.050(5). Approved variances are recorded in section 14 of the Company Rules and Regulations.

Q: What will be the collective effect of these revisions?

A: If these revisions are approved, the Company will have an improved basis to consider and make decisions about customer requests for redistribution. In my opinion, these changes will also give the Variance Committee a better context to examine and rule on variance requests should the Company deny redistribution.

Modification to Choice and Application of Rates

Q: Please describe the revision to the proposed modification to Choice and Application of Rates.

A: With the proposal to add demand thresholds, the Company needs to modify its terms for Choice and Application of Rate. Specifically, the current Rules specify that the selection of the rate schedule is the responsibility of the Customer. Under the demand threshold proposal, the Company wishes to assist customers by proactively changing customer rate schedules in response to observed usage. The Company proposes new language to support this proposal. Further, the Company recently made changes to its residential tariffs to allow rate choice as part of a filing to allow opt-out from the residential TOU rates.[20] Additional edits were made to this section of the Rules to align with those accomodations.

Q: What language does the Company propose to add?

A: The Company proposes to include the following as part of section 6.03, found on sheet R-6.02 of the proposed Rules with the following,

> C. Company may change customer's rate schedule and/or rider if Company discovers customer's Electric Service is no longer eligible

[20] ET-2026-0074, Tracking Nos. JE-2026-0081 JE-2026-0082, *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 or Modified Tariffs to Permit Customers to Opt-Out of Time of Use Rates.*

> for the rate schedule and/or rider under which customer is taking Electric Service. Company may reissue bills under the correct rate schedule for Electric Service taken under the incorrect rate schedule. Reissued bills shall cover only that portion of the previous 12-month period during which customer received Electric Service under the incorrect rate schedule and/or rider.

This language is similar to language used in the Evergy Kansas Central Rules where demand thresholds are already in place.[21] Subparagraph C is intended to guide the administration of the demand thresholds. The Company believes it is important for the Customer to retain primary responsibility for selecting their rate schedule and believes this additional language will help clarify the context for Company actions.

To accommodate residential rate choice, the revisions to Section 6.03 are more extensive. The Comapny has consolidated some terms and rearranged the order of Section 6.03 to improve flow and alignment with current practices. The primary subparagraph capturing the treatment of rate change is subparagraph B, specifically,

> B. If a customer is eligible to take electric service under more than one (1) rate tariff, the choice of such rate tariff lies with the customer. Any customer shall pay for service under the applicable rate tariff for all electrical power and energy used. Residential Customers may substitute any other applicable rate schedule by notifying Company. Non-residential Customers may change rates only once in any 12-month period unless, in Company's reasonable discretion, there is a substantial change in customer's use of Electric Service during such period. In that event, Company may allow customer to change rate schedule and/or rider. All Customer rate changes shall take effect after the date of the next meter reading after notice to Company.

This language is particularly important for residential customers to help guide selection of the optional rates available to them and achieves alignment with the flexibilities ordered by the Commission in ET-2026-0074.

[21] Evergy Kansas Central General Rules and Regulations, Section 2.04.

5. Class Cost of Service

Q: Please describe your testimony concerning the Class Cost of Service Study.

A: My testimony will provide the context for new allocations used in this study and explain the transitional steps taken to incorporate Large Load into the study.

Q: What new allocations are being used within the CCOS study?

A: With this filing the Company is choosing to honor commitments made in the EMW rate case, File No. ER-2024-0189. Specifically, the Stipulation states,

> h. The Company shall include the three phase/single phase distribution approach described by MECG, to the extent information is available and reliable, in the next rate case. This does not prohibit the Signatories from opposing this classification/allocation approach.
>
> i. The Company shall include a fuel allocation similar to the E8760 allocator described by MECG and based on class hourly data, to the extent information is available and reliable, in the next EMW rate case. This does not prohibit the Signatories from opposing this allocation approach.[22]

The Company is proposing to include the three phase/single phase allocator as part of the distribution allocation performed in this study.

Q: What is the purpose of this allocator?

A: The allocator was originally proposed by the Missouri Energy Consumers Group ("MECG") in the Direct Testimony of Kavita Maini. There she states,

> **Q. Why should the single phases costs be separated out from the three-phase circuit 10 configuration within the primary distribution system?**
>
> A. To properly assign costs to those customer classes and voltages that utilize the specific configurations. Feeders originate from substation in three-phase configuration and is distributed via separate conductors for each phase. The Company's primary distribution system consists of single-phase and three-phase circuit

[22] *Stipulation and Agreement*, Section 20, paragraph h and i, File No. ER-2024-0189 (filed October 2, 2024).

configurations. While the costs of these configurations are included in FERC accounts 364 through 367, the Company does not currently differentiate the system costs based on single and three-phased configurations as shown in response to MECG 2.4 (see Attachment A). As a result the COSS allocates costs related to single phase primary distribution circuits to both primary voltage and secondary voltage customers, which does not follow cost causation. Failure to separate out costs associated with single versus three phase distribution circuits results in over allocating the costs to primary voltage customers due to the following:

1. The Company has identified that through its Mapping System that 61.4% of the Company total miles of circuits are single phase and 38.6% are three-phase (including the two-phase configuration which is used to provide a form of three-phase service). As noted by the Company, the single phase circuits are not utilized to provide service to primary customers. Therefore, the single phase circuit related costs associated with 61.4% of the Company's total miles of circuits should only be allocated to secondary voltage customers. None of these costs should be allocated to primary voltage customers.

2. As it relates to the three-phase related configuration, the costs associated with this configuration should be allocated to secondary and primary voltage customers because as noted by the Company, the secondary voltage customers are also served by three-phased circuit configuration.

I am particularly concerned regarding the over allocation to primary customers (and therefore, related classes such as LPS) in this case because the Company has requested $56 million in revenue requirement associated with new infrastructure related primarily to distribution equipment, which includes overhead and underground conductors and associated infrastructure that incorporates the single phase and three-phase circuits.[23]

Q: How did the Company implement this new allocation?

A: The allocation was incorporated into our processing of distribution costs. Please see the Direct Testimony of Company witness Graham Jaynes for details.

[23] Direct Testimony of Kavita Maini, p. 23, line 11, File No. ER-2024-0189.

Q: Did the Company also implement the E8760 Fuel Allocation?

A: The Company examined this allocation but did not include it in this study. The concern raised by the Company in rebuttal testimony highlighted concerns about available data. Specifically, in Company stated,

> **Q: Do you believe that incorporating hourly fuel costs will add additional value to the Company's fuel allocation?**
>
> A: No, the purpose of the Company's fuel-weighted energy allocator is to reasonably allocate the monthly fuel costs relative to monthly class loads. The monthly allocator currently in place serves this purpose. Further expanding to hourly fuel costs could pose a very complex challenge for the Company from a cost and data-gathering perspective.[24]

Q: Was the data concern raised for EMW an issue for EMM as well?

A: Yes. While the Company was able to produce hourly data to explore the allocation, several assumptions and generalization were needed. When the results were compared to the allocations produced with monthly data, minimal difference was observed. Given the allowances needed to produce the hourly results, the Company did not think it appropriate to move away from the time-tested monthly allocation method. Prior to filing this case the Company reviewed the results with MECG and will examine hourly allocation in conjunction with the next EMW rate case as committed.

Q: Please describe the steps taken to address Large Load within the CCOS study.

A: First, some context around large load is important. The Company's Large Load Rate Plan case, File No. EO-2025-0154, concluded on November 13th with the Commission's Report and Order accepting a Non-Unanimous Stipulation and Agreement. Compliance tariffs were filed on February 5th and are not yet approved. Large Load customers seeking to

[24] Rebuttal Testimony of Craig E. Brown, page 11, line 3, File No. ER-2024-0189.

locate in the EMM jurisdiction continue to navigate the steps required to receive service, the Path to Power. In the determination of Revenues for this case, there are no Large Load customers occurring in the test year for the case, but the Company is proposing to include a Revenue adjustment. The motivation to include a Large Load revenue adjustment is discussed in the Direct Testimony of Company witness Kevin Gunn. The Revenue adjustment itself is discussed in the Direct Testimony of Company witness Graham Jaynes. Turning to the CCOS study, the Non-Unanimous Stipulation and Agreement included a provision intended to address the Company treatment of revenues. Specifically,

> The Signatories agree that the Company will compare Schedule LLPS customer base rate kilowatt-based revenue collections under the rates in Exhibit A to this Agreement during the period utilized for evaluation for Class Cost of Service ("CCOS") Study proposed in the next general rate proceeding to base rate kilowatt-based revenue collections that would have occurred for the same customers under Schedule LPS and the difference in revenues will be identified and reallocated to non-Schedule LLPS customer classes for CCOS study purposes only in determining sufficiency of class recovery of costs of service.[25]

In preparation of this CCOS study, the Company was mindful of these terms but recognized without an LLPS customer in the test year data, the provision could not be followed fully. Instead, the Company chose to apply the portion that could be followed and perform the class reallocation using the LLPS Revenue adjustment amount.

Q: Do you believe this approach is reasonable?

A: Yes. The reallocation of LLPS revenues is an important element of the LLPS Rate Plan and the settlement negotiated with the parties in that case. Additionally, as described in the Direct Testimony of Company witnesses Zac Gladhill and Kevin Gunn, although

[25] *Non-Unanimous Global Stipulation and Agreement*, p. 7, Section 14, paragraph i, File No. EO-2025-0154 (filed September 25, 2025).

considerable uncertainty remains concerning the timing and load levels achieved by large load customers, the customers are coming, and some recognition of this developing dynamic is important to consider in this CCOS study.

6. Service & Access Charge for Solar Subscription Service

Q: Please describe the Service & Access charge.

A: In the original design of the Solar Subscription Rider, Schedule SSP the Service & Access ("S&A") charge was set based the embedded cost of Transmission and Distribution for the Residential class based on the Company's class cost of service study from File Nos. ER-2018-0145/0146 rate cases. This charge was added to the cost of the solar resource to represent the costs of the grid. By adding it to the Solar Block charge, the Company felt that all costs for the energy of the solar resource we accounted for in the subscription pricing. Going forward, the Company expected the S&A charge would change if the costs attributed to Transmission and Distribution functions change in a subsequent rate case. The S&A charge may increase or decrease due to these provisions.

Q: What change is proposed for the S&A charge in this case?

A: No change is being proposed. A review of the costs in the CCOS[26] prepared for this case shows the Transmission and Distribution demand cost to be $0.0472 per kWh. Given transitions in cost allocation expected with the introduction of LLPS, the Company proposes the S&A charge remain at $0.040 per kWh.

Q: The Company recently completed a general rate case for the Evergy Missouri West jurisdiction. Were any changes made to the S&A charge in that proceeding?

A: No.

[26] The Current Class Structure version, Unit Cost tab.

7. Stand-by Rate Schedule Modifications

Q: Please describe your testimony concerning the Stand-by Rate Schedule?

A: The Company proposes adding a Minimum Demand alternative to the existing Stand-by rider with an expectation of a more complete design change in the future. Specifically, the Company proposed adding the following term to the General Provisions of Schedule SSR,

> As an alternative to the rates of this schedule, the Company may establish a minimum demand value that will be used to enable billing under the non-residential General Service Schedules, Schedule SGS, MGS, LGS, or LPS. Such minimum demand shall approximate at least 50% of the expected customer load should no customer generation be present. This minimum demand may be adjusted to maintain alignment with changes in customer load. The established minimum demand shall replace the Monthly Maximum Demand for months where the measured demand is less than the minimum demand.

Q: What is the purpose of the Schedule SSR tariff?

A: The Standby Service Rider is designed to apply specialized charges to the service of customers with behind the meter, on-site parallel distributed generation and/or storage system(s) with a capacity of 100 kilowatts (kW) or more who rely on that generation as their primary source of power. Through the application of separate charges for supplemental service, maintenance service, and standby service as well as provisions for treatment of excess energy returned to the grid, the rider is intended to ensure correct recovery from these partial requirements customers. The current design was the result of work with the Missouri Division of Energy in File Nos. ER-2018-0145/0146 and the tariff design was agreed to in the Non-Unanimous Stipulation and Agreement concerning rate design issues dated September 25th, 2018.

Q: Why is an alternative needed?

A: The Standby rate has been unused since its 2018 approval, and the complexity of the design serves as a barrier to customer understanding and to Company bill execution. In addition, the Company is receiving inquiries concerning customer generation, particularly renewable generation (solar or wind) with battery storage that appears capable of serving as the primary energy supply for that respective customer. If the Company is going to appropriately support this form of customer generation, there is a need to have a suitable rate design to properly price the service provided and make sure this arrangement does not have negative impacts on other customers.

Q: Why is this alternative appropriate?

A: Beyond operational accommodations, the primary concern arising from customers seeking to self-supply a majority of their energy needs is to ensure recovery of their cost of service. These non-residential customers expect that the Company be available to back up their generation for those hours of the year when the customer generation is unavailable. In order to provide this backup, the Company needs to install sufficient infrastructure to serve the full load of the customer. Under traditional ratemaking, rates are set based on annual determinants and customers who intentionally avoid consumption from the Company do not pay their costs of service. In the short term, these costs are simply not recovered. In the longer term, these costs are passed on to other customers for recovery. Utilization of a minimum demand establishes a reasonable method to ensure a level of cost recovery and can be accomplished easily within the current billing of customers.

Q: What are these operational accommodations?

A: Beyond the installation of sufficient infrastructure to serve the full load of the customer mentioned previously, the Company must also retain capacity on the circuits and substation to provide the instantaneous backup these customers expect. In short, considerable accommodations are made for these customers.

Q: What changes are needed in the future to make the Standby Service Rider a viable option for customers?

A: The Company does not have a different Standby rate design in mind at this time and continues to monitor developments in the industry for guidance. It is clear that a mechanism is needed to balance the needs of these customers, support the deployment of customer generation, and protect other customers from added costs.

8. Parallel Generation Rate Schedule Modifications

Q: Please describe your testimony concerning the Parallel Generation Rate Schedule?

A: The Company proposes adding the following to the APPLICABILITY section of the tariff,

> At the time of interconnection, the Customer must be current on all billings for service and not subject to disconnection for nonpayment.

Q: What is the purpose of the Schedule PG tariff?

A: Schedule PG addressed customers with on-site generation, establishing basic terms for interconnection and operation. The Schedule also establishes the billing and payment for electrical energy delivered to the Company grid.

Q: Why is this change needed?

A: The Company believes it's important that the Customer be in good standing before entering into an arrangement to receive payment from the Company for energy delivered to the grid.

This revision is not intended to delay customer interconnection, but instead to ensure customers are current concerning service already received.

9. Economic Development Rider Clean-up

Q: Why are portions of the Economic Development Rider being eliminated?

A: The Company Economic Development Rider, Schedule EDR currently contains two sets of terms with one set, sheets32 through 32D, unavailable for current use (frozen). The sets are driven by changes to the statutory language enabling the EDR. The frozen set was retained while the EDR discounts granted under those terms completed their respective terms. With the filing of this rate case, there are no active EDR discounts related to the frozen terms, giving the Company the opportunity to remove sheets 32 through 32D now.

Q: Is the EDR still available to customers?

A: The Economic Development Rider will continue to be available based on the terms set forth in sheets 32E through 32J.

Q: Does that conclude your testimony?

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 Implement A General Rate Increase for Electric Service	))))	Case No. ER-2026-0143

AFFIDAVIT OF BRADLEY D. LUTZ

STATE OF MISSOURI)) ss
COUNTY OF JACKSON)

Bradley D. Lutz, being first duly sworn on his oath, states:

1. My name is Bradley D. Lutz. I work in Kansas City, Missouri and I am employed by Evergy Metro, Inc. as Director – Regulatory Affairs.

2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Evergy Missouri Metro consisting of forty (40) 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.

Bradley D. Lutz
Bradley D. Lutz

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

Anthy R Westenkirchner
Notary Public

My commission expires: April 26, 2029

ANTHONY R WESTENKIRCHNER
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 26, 2029
PLATTE COUNTY
COMMISSION #17279952