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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2026-0143

DIRECT TESTIMONY

OF

JESSICA L. TUCKER

ON BEHALF OF

EVERGY MISSOURI METRO

Kansas City, Missouri
February 2026

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DIRECT TESTIMONY

OF

JESSICA L. TUCKER

Case No. ER-2026-0143

I. INTRODUCTION

Q: Please state your name and business address.

A: My name is Jessica L. Tucker. My business address is 1200 Main Street, 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 Senior Manager, Fuels & Emissions for Evergy Metro, Inc. d/b/a as Evergy Missouri Metro ("Evergy Missouri Metro," "EMM," or "Company"), Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West"), 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.

Q: On whose behalf are you testifying?

A: I am testifying on behalf of Evergy Missouri Metro. As described below, references to "Evergy Metro" include Evergy Kansas Metro because Evergy Metro, Inc. is comprised of Evergy Kansas Metro and Evergy Missouri Metro.

Q: What are your primary responsibilities?

A: My primary responsibilities include management and oversight of fuel procurement and logistics (apart from natural gas), as well as fuel additive procurement and coal combustion residual product management and marketing for Evergy generating stations.

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

A: I graduated Summa Cum Laude from Kansas State University in December 1999 with a Bachelor of Science degree in Agriculture. I began my career in the energy industry in January 2001 with Aquila as an Associate Hourly Trader. In this role, my efforts were focused on executing short term physical power transactions in the real-time market across various North American Electric Reliability Corporation ("NERC") regions. My employment with KCP&L began in August of 2002 as an Hourly Trader on the real-time desk. From August 2002 to May 2006, my role focused on buying and selling power in the real-time market. In June 2006, I was promoted to Interchange Marketer, which focused my trading activity on day ahead and monthly power transactions. I was also a part of KCP&L's Regional Transmission Organization ("RTO") integration team that prepared the generation dispatching and trading area for participation in the Southwest Power Pool ("SPP") Energy Imbalance Service ("EIS") market, which launched on February 1, 2007. In November 2010, I was promoted to Manager, System Operations (Power). My primary responsibility was to oversee 24 x 7 Power Control Center functions, which consisted of real time and day ahead power trading, power scheduling, and generation dispatching operations. This not only included overseeing our participation in the SPP market, but also compliance with applicable NERC Reliability Standards. I was also responsible for preparing the dispatching and trading group for participation in the SPP Integrated Marketplace ("IM"), which launched on March 1, 2014. In April 2015, I was promoted to Senior Manager, Power System Operations. In July 2017, I transitioned to the position of Senior Manager, Fuels & Emissions within the Fuels group.

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

A: Yes. I have testified before the MPSC and the Kansas Corporation Commission. The testimony I gave in those proceedings involved fuel-related issues and issues related to the SPP Integrated Marketplace.

Q: **On what subjects will you be testifying?**

A: I will be testifying on fuel-related issues. My testimony serves two purposes. First, I am supporting the fuel prices, emission prices, and certain fuel and emission related costs, including fuel inventory, additives, and adders used to develop the Company's Cost of Service ("COS") calculations. Second, I will address certain fuel and emission allowance related issues as required when a company seeks to continue a fuel adjustment clause ("FAC").

II. FUEL IN COST OF SERVICE

Q: What is the purpose of this portion of your testimony?

A: The purpose of this part of my testimony is to explain how prices for fuel, and fuel-related commodities, were forecast to project fuel expense for the COS included in the Company's direct filing. Additionally, I explain how the Company plans to true-up those costs later in this proceeding. Please note that fuel operations, fuel forecasting, fuel inventory management, and fuel procurement are done at the Evergy Metro level, thus most of my testimony references Evergy Metro as opposed to Evergy Missouri Metro. The values reflected in Schedule JLT-1 (**Confidential**) and in my supporting workpapers represent

Evergy Metro. The appropriate allocation factors can be applied to the Evergy Metro values to obtain the portion applicable to Evergy Missouri Metro.

A. Fuel Price Forecast

Q: What fuel prices were used to develop the COS in this case?

A: Evergy Metro used coal prices as projected for June 30, 2026. Oil pricing for model dispatch was determined by using the New York Mercantile Exchange ("NYMEX") futures contract price for June 2026 as of September 10, 2025. With respect to natural gas, a 3-year average was used as discussed below. Please refer to the direct testimony of Company witness Ronald A. Klote regarding the test year and expected true-up period.

Q: Will these projected prices be replaced with actual prices in the June 2026 true-up?

A: Yes. The projected prices for coal, oil, and natural gas are expected to be replaced with actual pricing in the June 2026 true-up. However, please note that Evergy Metro may adjust this approach for natural gas pricing in the event of unusual or abnormal pricing events leading up to the June 2026 true-up that would not be representative of costs going forward.

Q: How did you forecast the coal prices?

A: The June 2026 delivered prices of Powder River Basin ("PRB") coal were forecast as the sum of the mine price and the transportation rate, inclusive of diesel fuel surcharge. A portion of the coal contracts under which Evergy Metro expects to purchase PRB coal in 2026 specify a fixed mine price that is only subject to adjustment for quality or government

imposition, such as changes in laws, regulations, or taxes. Those contracts that are not fixed are tied to a market index or are a combination of both.

Q: How did you forecast the freight rates for moving PRB coal?

A: The freight rates for La Cygne and Hawthorn Generating Stations were forecasted based upon the rail contracts for those stations. For contracts that were set to expire at the end of 2025, projected rates were used to estimate June 2026 costs. Iatan Generating Station receives rail service under BNSF tariff; thus, the projected Iatan freight rate was forecasted as an escalation from the Q3 2025 freight rate.

Q: How did you forecast the natural gas prices used to develop the Company's COS?

A: Monthly natural gas prices were derived from the September 10, 2025, NYMEX Henry Hub Natural Gas futures and Intercontinental Exchange ("ICE") Southern Star NG Basis futures contract settlement prices from the period of January 2025 through December 2027. Monthly Southern Star outright prices were calculated by adding the monthly Southern Star NG Basis prices to the applicable Henry Hub futures contracts. Then, an average price for each calendar month was calculated from the 2025 - 2027 period to develop the cost of natural gas included in the COS. In addition to the cost of the natural gas commodity itself, other costs such as overrun, transport, and annual charge adjustment and modernization fees were also included.

Q: How did you forecast the oil prices?

A: Oil is used primarily for flame stability and start-up at Evergy Metro's Iatan and La Cygne coal units. The price of oil used for flame stability and start-up was based on the June 2026 heating oil futures contract. The fuel price forecast for oil at these stations was based on NYMEX daily settlement price as of September 10, 2025. Although there is considerable

storage capability and working inventory onsite, Evergy Metro's oil-fired Northeast Station units were also assumed to be dispatched using June 2026 projected oil pricing because as oil is utilized, it must be replaced at market pricing. Wolf Creek's start-up oil was priced using June 2026 projected oil pricing.

B. Fuel Additives and Fuel Adders

Q: Are there costs related to fuel that are not included in the price?

A: Yes. Generally, those costs fall into two categories: "fuel additives" and "fuel adders." Common Evergy Metro fuel additives include ammonia, lime, limestone, and powder activated carbon ("PAC"), which are used to control emissions or improve boiler performance. The fuel adders include unit train lease expense, unit train maintenance, unit train property tax, and unit train depreciation. Additional fuel adders include coal dust mitigation, glycol, freeze protection, and certain costs associated with transporting natural gas that have not already been included in the cost of natural gas, as discussed above. These forecasted costs are expected to be trued up to actual costs during the course of this proceeding.

Q: Why does Evergy Metro need fuel additives?

A: Fuel additives, which include pollution control reagents, are commodities that are consumed in addition to the fuel either through combustion or chemical reaction. For example, ammonia is added to a stream of flue gas where it reacts with nitrogen oxide ("NO_x") as the gases pass through a catalyst chamber. Lime (or limestone) is added to the flue gas stream in a flue gas desulfurization module to "scrub" sulfur dioxide ("SO_2"). Some units also use PAC as a sorbent for controlling mercury emissions.

Q: How did you determine the cost of the fuel additives?

A: Except for premium ammonia, the cost of fuel additives was determined by the quantity times the price where the price was the value projected for the June 2026 true-up, and the quantity was based on historical usage rates applied to volumes developed by Company witness Hsin Foo. The cost for premium ammonia was determined by the quantity times the price, where the price was the value projected for June 2026 true-up and the quantity was based on historical usage rates applied to historical volume. These costs and usage rates are expected to be trued up during the course of this proceeding.

Q: How did you determine the cost of the fuel adders?

A: I will address each of the fuel adders in turn, but generally the costs of the various fuel adders were based on a projection of their annual expense.

Q: Please describe the unit train-related expenses.

A: Unit train related expenses include:

- Lease expense (which is separated into two components):
  - Long-term lease expense;
  - Short-term lease expense;
- Ad valorem private car line taxes;
- Railcar depreciation;
- Maintenance expense consisting of:
  - Foreign car repair, which is the cost of repairing railcars that are running in service for Evergy Metro but are not owned by or under lease to Evergy Metro;

- Shared expenses which are costs for items like Association of American Railroads publications, Railinc applications and services fees, and railcar management fees that cannot be assigned to an individual car but are "shared" or distributed across the fleet;
- Maintenance and repair of the owned and leased railcar fleet;
- Ancillary charges including detention, switching, storage, and out-of-route costs.

Q: Are there other coal transportation related adders?

A: Yes. Topper agents are applied to the surface of loaded railcars to mitigate the loss of coal dust while in transit. Side-release agents are applied to railcars to minimize the amount of carry-back coal during cold weather. These agents are applied by the coal companies during the loading process at the mines and are used to improve the safety of railroad operations.

Q: What are the fuel adder costs associated with transporting natural gas?

A: The adder costs for transporting natural gas fall into two categories. The first category are relatively fixed costs, which include reservation or demand charges and meter charges. The second category consists of volumetric costs which includes fuel and loss reimbursement costs.

Q: **How did you determine the costs associated with transporting natural gas?**

A: The costs of transporting natural gas were separated into their various components. For the reservation or demand charges, the pipeline's current rates were used to calculate the charges Evergy Metro expects to pay for the 12 months of July 2025 through June 2026. For volumetric based costs, the pipeline's and local distribution company's current rates

were applied to the volumes developed by Company witness Hsin Foo. Those various components were then aggregated into either commodity-based charges or reservation charges.

1. Emission Allowance Cost

Q: How did you forecast emission allowance prices?

A: Evergy Metro used forecasted pricing from TFS Energy. In terms of emissions allowance pricing in the fuel model, there was no explicit input in the model given that Evergy Metro is not expecting to purchase notable volumes of emission allowances, if any at all, under current regulations.

Q: Do you expect to replace these fuel and fuel-related price or cost estimates with actual prices or costs that are known at true-up?

A: Yes

2. Fuel Inventory

Q: What is the purpose of this portion of your testimony?

A: The purpose of this portion of my testimony is to explain the process by which Evergy Metro determines the amount of fuel inventory to keep on hand and how the level of fuel inventory impacts the COS.

Q: Why does Evergy Metro hold fuel inventory?

A: Evergy Metro holds fuel inventory because of the uncertainty inherent in both fuel requirements and fuel deliveries. Both fuel requirements and deliveries can be impacted by the weather. Fuel requirements can also be impacted by SPP market conditions, the availability of the unit holding the inventory, and the availability of other units in the Evergy Metro or Southwest Power Pool system. Additionally, fuel deliveries can also be

impacted by breakdowns at a mine or in the transportation system. Events like the 1993, 2011, and 2019 Missouri River floods, the 2005 joint line derailments in the Southern Powder River Basin ("SPRB"), and the railroad service issues that significantly reduced the delivery of coal to Evergy Metro's plants from March 2013 through September 2014, and more recently over the course of 2021 and 2022. Fuel inventories act as insurance against events that interrupt the delivery of fuel or unexpectedly increase the demand for fuel. All of these factors vary randomly. Fuel inventories act like a "shock absorber" when fuel deliveries do not exactly match fuel requirements and enable Evergy Metro to continue generating electricity reliably between fuel shipments.

Q: How does Evergy Metro manage its fuel inventory?

A: Managing fuel inventory involves ordering fuel, receiving fuel into inventory, and burning fuel out of inventory. Evergy Metro controls inventory levels primarily through its fuel ordering policy. The fuel ordering policy occurs where Evergy Metro sets fuel inventory targets and then orders fuel to achieve those targets. Inventory targets are defined as the inventory level that Evergy Metro aims to maintain on average during "normal" times. In addition to fuel ordering policy, plant dispatch policy can be used to control inventory. However, Evergy Metro does not solely control the dispatch of its units. Effective March 1, 2014, NERC certified SPP as the Balancing Authority ("BA") for the SPP region. As the BA and RTO operating an integrated marketplace for electric power, SPP optimizes the generation resources for its members using a regional security-constrained, offer-based economic algorithm to dispatch the members' units. If a plant is low on fuel, SPP might coordinate with the plant owner and/or operator to reduce the operation of that plant to conserve inventory. This could require other plants under SPP's dispatch to operate and

consume more fuel than they normally would. One can view this as a transfer of fuel "by wire" to the plant with low inventory. To determine the best inventory level, Evergy Metro balances the cost of holding fuel against the expected cost of running out of fuel.

Q: What are the costs associated with holding fuel inventory?

A: Holding costs reflect cost of capital and operating costs. Holding inventory requires an investment in working capital, which requires providing investors and lenders returns that meet their expectations. It also includes income taxes associated with providing the cost of capital. The operating costs of holding inventory include costs other than the cost of the capital tied up in the inventory. For example, property tax is recognized as an operating cost.

Q: Please explain what you mean by the expected cost of running out of fuel.

A: In this context, expected cost means the probability of running out of fuel times the cost of running out of fuel. The cost of running out of fuel at a power plant is the additional cost incurred when a more expensive resource must be dispatched to serve the load that would have otherwise been served by the plant if it had the fuel to do so. If there are not enough resources available to serve load, there could be a failure to meet customer demand for electricity.

Q: How does Evergy Metro determine the best inventory level, *i.e.*, the level that balances the cost of holding fuel against the expected cost of running out?

A: Evergy Metro uses the Electric Power Research Institute's Utility Fuel Inventory Model ("UFIM") to identify inventory levels with the lowest expected total cost. That is, Evergy Metro aims to minimize the sum of inventory holding costs and the expected cost of running out of fuel.

Q: How does UFIM work?

A: UFIM uses a Markov decision model which considers uncertainties in fuel requirements and deliveries, the likelihood and severity of disruptions, changes in fuel and power prices, and the cost of carrying inventory. UFIM simulates iterations through various order policies to determine the optimal order policy. The model identifies an inventory target as a concise way to express the following fuel ordering policy:

Current Month Order = (Inventory Target – Current Inventory)
+ Expected Burn this Month
+ Expected Supply Shortfall

That is, UFIM's target assumes all fuel on hand is available to meet expected burn. "Basemat" is added to the available target developed with UFIM to determine the inventory target. Generally, and in the rest of my testimony, references to inventory targets mean the sum of fuel readily available to meet burn plus Basemat.

Q: What is Basemat?

A: Basemat is the quantity of coal occupying the bottom portion of our coal stockpile footprint. It may or may not be useable due to contamination from water, soil, clay, or fill material on which the coal is placed. Because of this uncertainty about the quality of the coal, Basemat is not considered readily available. However, because it is dynamic and it can be burned (although with difficulty), it is not written off or considered sunk.

Q: How does the UFIM model work?

A: The fundamental purpose of UFIM is to develop least-cost ordering policies, *i.e.*, targets, for fuel inventory. UFIM does this by dividing time into "normal" periods and "disruption" periods, where a disruption is an event of limited duration with an uncertain occurrence. It

develops inventory targets for normal times and disruption management policies. The inventory target that UFIM develops is generally that level of inventory that balances the cost of holding inventory with the cost of running out of fuel. It should be noted that UFIM produces output curves which provide for the costs associated with a range of inventory levels. It is not unusual for a small range of inventory levels to have flatter curves (similar costs), thereby providing for some flexibility in terms of target levels depending on the operating environment.

Q: What are the primary inputs to UFIM?

A: The key inputs are: holding costs, fuel supply cost curves, costs of running out of fuel, fuel requirement distributions, "normal" supply uncertainty distributions, and disruption characteristics.

Q: What are the holding costs you used to develop coal inventory levels for this case?

A: The holding costs Evergy Metro used to develop coal inventory levels were based on the cost of capital as of July 31, 2024. As discussed below, the coal inventory targets used in the direct filing were those in place for most of 2025 but will be updated, if necessary, to the 2026 targets in the June 2026 true-up.

Q: What do you mean by "fuel supply cost curves"?

A: A fuel supply cost curve recognizes that the delivered cost of fuel may vary depending on the quantity of fuel purchased in a given month. For example, Evergy Metro's fuel supply cost curves for Powder River Basin ("PRB") coal recognize that when monthly purchases exceed normal levels, additional train sets may need to be leased. Those lease costs cause the marginal cost of fuel above normal levels to be slightly higher than the normal cost of fuel.

Q: What did you use for the normal cost of coal?

A: The normal fuel prices underlying all of the fuel supply cost curves were the average quarterly projected price forecasts for 2024.

Q: What did you use for the costs of running out of coal?

A: There are several components to the cost of running out of coal. The first component is the opportunity cost of forgone power sales. Evergy Metro developed that cost by constructing a price duration curve derived from the nodal Locational Marginal Prices ("LMP") for each station. Evergy Metro supplemented these projections by adding, as the last points on the price duration curves, an estimate of the cost for using oil-fired generation followed by the assumed socio-economic cost of failing to meet load, for which Evergy Metro's assumed cost for unserved load was used. These price duration curves are referred to in UFIM as burn reduction cost curves. Burn reduction cost curves can vary by inventory, location, and disruption.

Q: What fuel requirement distributions did you use?

A: Distributions were based on modeled fuel consumption.

Q: What do you mean by "normal" supply uncertainty?

A: Evergy Metro typically experiences random variations between fuel burned and fuel received in any given month. These supply shortfalls or overages are assumed to be independent from period to period and are not expected to significantly affect inventory policy. To determine these normal variations, Evergy Metro developed probability distributions of receipt uncertainty based on the difference between historical burn and receipts.

Q: What are disruptions?

A: A disruption is any change in circumstances that persists for a finite duration and significantly affects inventory policy. A supply disruption might entail a complete cut-off of fuel deliveries, a reduction in deliveries, or an increase in the variability of receipts. A demand disruption might consist of an increase in expected burn or an increase in the variability of burn. Other disruptions might involve temporary increases in the cost of fuel or the cost of replacement power. Different disruptions have different probabilities of occurring and different expected durations.

Q: What disruptions were used in developing Evergy Metro's coal inventory targets?

A: Several types of disruptions were considered in development of its inventory targets:

- Railroad or mine capacity constraints;
- Fuel yard failures; and
- Major floods / Extreme weather.

Q: Please explain what you mean by disruptions related to railroad or mine capacity constraints.

A: Supply capacity is the ultimate quantity of coal that can be produced, loaded, and shipped out of the PRB in a given time period. Constraints to supply capacity can come from either the railroads or the mines, but regardless of which of these is the constraint source, the quantity of coal that can be delivered is restricted. A constrained supply caused by railroad capacity constraints can come from an inability of the railroad to ship a greater volume of coal from the PRB. This type of scenario can arise from not having enough slack capacity to place more trains in-service. Beginning in the winter of 2013-2014 and lasting into the latter part of 2014, there was a serious decline in rail service across the U.S. rail network

particularly in the upper Midwest region. Similarly, utilities across the country experienced a consequential decline in rail service over the course of 2021 and 2022, leading to significantly lower than desired coal inventories due to a myriad of operating issues on the part of the railroads. A supply disruption can also come from an infrastructure failure, such as the May 2005 derailments on the joint line in the Southern PRB, which reduced rail capacity and limited coal shipments out of the basin. These degradations in service are examples of the disruptions that Evergy Metro refers to as railroad or mine capacity constraints.

A variety of mine issues can constrain supply, such as a lack of available loadouts or space to stage empty trains, reaching the productive limits of equipment such as shovels, draglines, conveyors, and trucks, or the mine reaching the production limits specified in its environmental quality permits. Evergy Metro lumps the mine and railroad capacity constraints together because they can occur simultaneously, and one may mask the other.

Q: Please explain what you mean by disruptions related to fuel yard failures.

A: Disruptions related to fuel yard failures may result from a variety of circumstances that cause significant constraints on a plant's ability to receive fuel. For example, the loss or failure of equipment, such as dumpers, coal conveyors, stacker/reclaimers, or other critical fuel yard equipment can materially limit the ability of a plant to receive coal. Depending on the severity of the circumstances, these events can be several days to several months in duration.

Q: Please explain what you mean by "major flood" and "extreme weather" disruptions.

A: A "major flood" disruption occurs when a flood lengthens railroad cycle times, as railroads reroute trains and curtail coal deliveries to generating stations. Examples of such

disruptions include the Missouri River floods of 1993, 2011, and 2019. The "major floods" disruption was modeled after those major flood events.

Extreme weather can cause reduced fuel deliveries, unexpected increases in fuel burn, and increases in the cost of fuel and/or replacement power. For example, extreme winter weather can interfere with the railroad's ability to deliver trains, the availability of oil delivery trucks, and increase fuel burn because of higher electric demand. The "extreme weather" disruption was modeled after the February 2021 arctic winter weather event known as Winter Storm Uri, which brought unprecedented cold temperatures to the Midwest and midcontinent regions of the country.

Q: What are the coal inventory targets used in this case?

A: The coal inventory targets resulting from the application of UFIM and their associated value for incorporation into rate base are shown in the attached **Confidential Schedule JLT-1**. These values are used to determine adjustment RB-74, "Adjust Fossil Fuel Inventories to required levels," which is included in Schedule RAK-2 of the direct testimony of Company witness Ronald A. Klote. Since these coal inventory targets are a function of fuel prices, cost of capital, and other factors that may be adjusted in the course of this proceeding, Evergy Metro would expect to adjust the coal inventory targets, as necessary. It should be noted that the UFIM inventory targets are 2025 target levels, as reflected in **Confidential Schedule JLT-1**. The targets will be updated at true-up if applicable. However, Evergy Metro does not currently expect there to be any change from the 2025 target levels.

Q: Are Evergy Metro's coal inventory targets within the range established under UFIM?

A: Yes. Evergy Metro coal inventory targets are generally towards the upper end of the ranges established under UFIM, which Evergy Metro believes is prudent inventory management given the level of uncertainty and disruption risk involved. Over the course of the past 8 to 10 years Evergy Metro has seen an increase in the frequency of coal delivery disruptions. In the 2013 – 2014 timeframe, rail service across the U.S. rail network, in particular the upper Midwest region, seriously declined in part because of the effort to move oil by rail. In 2019, Missouri River flooding wreaked havoc on the rail networks causing deliveries to substantially decrease, if not stop altogether for a period of time. In late 2020, Evergy Metro began to see a slowdown in deliveries because of a series of operational decisions made by the railroads to streamline operations. Thus, there was a decrease in the number of personnel available to operate the rail fleet, which was only compounded by the COVID-19 pandemic and February 2021's Winter Storm Uri, along with other winter weather events in the PRB region. A more recent contributor to unreliable rail deliveries was the contract disputes between the railroad companies and the labor unions, which ultimately required federal intervention in 2022. The latest slowdown in deliveries took place in Summer 2025 because of coal mine operating challenges associated with widespread wet weather, equipment outages, and hiring struggles. Given the frequency of challenges with getting reliable coal deliveries over the past several years, the inventory levels toward the upper end of the UFIM ranges were used to establish coal target values in order to ensure more reliable fuel availability. While these coal target values are somewhat higher than the lowest point on the curve, the differences in costs are minimal.

Q: How are the oil inventory volumes established?

A: For Hawthorn and La Cygne, the inventory volumes are based on average daily inventory on hand for the 12-month period of July 2024 through June 2025. Northeast Generating Station inventory volumes are based on average daily inventory on hand for the period of July 31, 2024 through June 30, 2025. Wolf Creek's inventory volume is based on the average month-end quantity on hand for the 13-month period of September 2024 through September 2025.

Q: How were the inventory values for coal determined?

A: Inventory values for Hawthorn, Iatan, and La Cygne PRB coal were calculated using the UFIM-based inventory target volumes discussed above, multiplied by projected June 2026 pricing. The inventory value for the remaining bituminous coal that is on hand at La Cygne is calculated as the inventory on hand as of September 2025 multiplied by the September 2025 month-end inventory value per unit. The inventory values for coal are shown in **Confidential Schedule JLT-1**.

Q: How were the inventory values for oil determined?

A: For Iatan and La Cygne Generating Stations, the oil inventory values were calculated as the average daily quantity on hand for the 12-month period from July 2024 through June 2025 multiplied by the projected June 2026 per unit value as of September 10, 2025. Inventory value for Northeast Generating Station was calculated based upon the average daily quantity on hand for the period of July 31, 2024 through June 30, 2025, multiplied by the September 2025 month-end inventory price per unit. For Wolf Creek, the inventory value was calculated as the average month-end quantity on hand for the 13-month period of September 2024 through September 2025 multiplied by the September 2025 month-end

inventory price per unit. The inventory values for oil are shown in **Confidential Schedule JLT-1**.

Q: How were the inventory values for fuel additives determined?

A: Inventory values for fuel additives were calculated as the projected June 2026 per unit value multiplied by the average daily quantity on hand for the 12-month period from July 2024 through June 2025. It should be noted that due to difficulty with measuring precise usage, static inventories are utilized for some additives at some locations. The inventory values for these additives are shown in **Confidential Schedule JLT-1**.

Q: Will you true-up the coal inventory values?

A: Yes. Evergy Metro expects to true-up the PRB coal inventory values by applying June 2026 pricing to the UFIM-based inventory targets. For La Cygne bituminous coal, the month end June 2026 per unit value will be applied to June 2026 month-end quantity on hand.

Q: **Will you true-up the oil inventory volumes and values?**

A: Yes. Evergy Metro expects to calculate new 12-month average daily quantities on hand for Iatan and La Cygne representing July 2025 through June 2026 and will use June 2026 prices to calculate these inventory values at true-up. For Northeast, the updated 12-month average daily quantity on hand from July 2025 through June 2026 will be multiplied by the June 2026 month-end inventory value per unit to determine inventory value at true-up. Wolf Creek's true-up value will be calculated as the average month-end quantity on hand for the 13-month period of June 2025 through June 2026 multiplied by the June 2026 month-end inventory price per unit.

Q: Will you true-up the fuel additive volumes and values?

A: Yes. Updated 12-month average daily quantities on hand representing July 2025 through June 2026 will be calculated and then applied to June 2026 pricing to calculate inventory values at true-up.

III. FUEL ADJUSTMENT CLAUSE

A. Factors Considered

Q: Commission Rule 20 CSR 4240-20.090(2)(D) identifies factors the Commission will consider in determining which cost components to include in a rate adjustment mechanism. Which of those factors will you address?

A: I will address those factors related to the market impact on fuel costs. Specifically, I will discuss:

1. fuel market volatility and how market volatility impacts fuel costs,
2. the substantial market impact on fuel costs; and
3. how the market impact on fuel costs is beyond the control of management.

1. Fuel Market Volatility and How Market Volatility Impacts Fuel Costs

Q: How do changes in fuel markets affect Evergy Metro's COS?

A: Changes in fuel markets affect Evergy Metro's COS in multiple ways. The first and most obvious impact is the effect of changes in fuel prices and their direct effect on fuel expense. Second, is the effect of changing fuel prices on the cost of electricity production, thus impacting the cost of electricity bought and sold in the SPP market.

Q: How have fuel prices changed over the past few years?

A: Natural gas prices have demonstrated significant levels of volatility over the past few years, driven by a variety of factors. Schedule JLT-2 and Schedule JLT-3 show how fuel prices

have changed dramatically over the last 10 years. Schedule JLT-2 shows how from January 2022 through December 2025 the price for Henry Hub Natural Gas futures has ranged from $1.58/million British thermal units ("MMBtu") to $9.68/MMBtu. Spot physical natural gas prices, which are more reflective of Evergy Metro's true cost of gas, have demonstrated an even greater range in recent years, with PEPL next day gas prices ranging from $0.95/MMBtu to $25.86/MMBtu. PRB coal ranged from $0.76/MMBtu to $1.60/MMBtu during that same timeframe, as shown in Schedule JLT-3.

Q: How do recent prices and volatility compare historically?

A: Since January of 2022, the prompt month Henry Hub Natural Gas futures contract has settled as high as $9.68/MMBtu and as low as $1.58/MMBtu. This range can be explained by both real events and market speculation, but it is safe to say that fuel markets in general have recently experienced increased levels of price volatility compared to prior years. Indeed, the period from January 2016 through December 2021 saw Henry Hub prices range from $1.48/MMBtu to $6.31/MMBtu, with the vast majority of that time spent in a $1.90/MMBtu to $3.70/MMBtu range.

Q: What is driving this volatility?

A: First, while both domestic supply and demand have increased in recent years, a lack of investment in natural gas transportation and storage infrastructure has placed a greater importance on the existing infrastructure. This translates to more frequent periods of very low or very high pricing.

Second, the fact that much of the demand growth has come in the form of natural gas export capacity has meant that the U.S. market is much more exposed to international

markets, which have demonstrated even greater volatility in recent years tied to geopolitics, supply/demand logistics, extreme weather events, and the pandemic.

Third, the build out of renewable generation capacity and the subsequent retirement of coal generation capacity have put a greater reliance on natural gas to meet the demands of the electric grid. Effectively, this transition has largely removed the electricity market's ability to utilize commodity prices to mitigate demand for one commodity (natural gas in this case) and incentivize demand for another (coal). The result is that natural gas demand for electricity generation in the U.S. has become price inelastic.

Combined, these factors have contributed to the increased volatility.

Q: Have PRB coal prices, like natural gas, demonstrated significant volatility?

A: While the PRB coal market did experience a period of extreme prices and volatility in 2021 and to some extent in 2022, prices have since stabilized at more normal-like levels. Although prices have currently stabilized, the risk of future volatility remains. While renewable generation build-out, exposure (or lack thereof) to international markets, and natural gas certainly can have an impact on the PRB coal markets, a very important piece of the puzzle is the performance of U.S. railroads. During the 2021 and 2022 rail performance meltdown, utility coal stockpiles were drained as the railroads were unable to deliver needed coal to customers. This resulted in the need to rebuild utility stockpiles in 2023. As discussed in the UFIM section of my testimony, Evergy Metro has seen more frequent disruptions in terms of railroad performance in recent years. Uncertainty pertaining to future rail performance, along with other factors, such as continued renewable portfolio expansion or the possibility of prolonged periods of flooding/extreme weather, contribute to the potential for future PRB coal market volatility.

Q: Why are these historical fluctuations in market prices for fuel the expressions of volatility the Commission needs to consider when determining which cost components to include in a rate adjustment mechanism?

A: Historical fluctuations should be considered because they are the prices Evergy Metro faces when it looks to buy fuel. Only after Evergy Metro makes a short- or long-term purchase commitment (physical/financial) is that volatility mitigated. Moreover, that mitigated price may be quite different than the fuel price embedded in the cost-of-service calculations upon which the Company's rates are built.

Q: What do you mean by saying Evergy Metro faces fluctuations in market prices when it looks to buy fuel?

A: Let's start with natural gas. Evergy Metro makes purchases on the day it needs the gas, or close to it. After it receives a commitment or dispatch instruction for one of its natural gas units, Evergy Metro solicits offers for natural gas to support that run. These types of gas purchases are subject to intra-day volatility, in addition to the daily volatility shown by the daily settlement prices in **Schedule JLT-2**.

Evergy Metro buys oil much like a consumer buys gas for a car. That is, when the tank is low, Evergy Metro refills it. Like with a car, there are times when you have some flexibility about when to refill your tank and there are times when you do not have such freedom. In either case, you do not know whether the price will go up or down after you make your purchase. Even if you did, you may not have the flexibility to wait for the price to go down. Both price and timing are a function of the movement in market prices.

Coal is somewhat like my oil example above. As a coal buyer, Evergy Metro faces volatility, as shown in **Schedule JLT-3**. After Evergy Metro signs a contract that fixes the

price, volatility is mitigated for its customers. Evergy Metro faces market volatility for all of its fuel requirements which do not have fixed price contracts.

Q: What are the main volumes that are exposed to market volatility?

A: Regarding coal, as of January 1, 2026, approximately **[redacted]** of Evergy Metro's expected coal burn from 2027 through 2030 was under contract. In other words, Evergy Metro is exposed to volatile market prices for roughly **[redacted]** of its expected coal requirements during the period in which rates from this proceeding will be in effect.

All of Evergy Metro's expected oil usage is also exposed to market volatility because it is not hedged. Evergy Metro currently has a forward procurement policy in place that includes natural gas, however, that policy includes other products and only accounts for a portion of normalized load net short positions. Therefore, the majority of natural gas is still procured at spot prices and is exposed to market volatility.

Q: As it relates to natural gas and purchased power procurement, are there any changes that Evergy Metro would like to make going forward?

A: Yes. Evergy Metro is proposing two separate natural gas fuel supply plans. The existing natural gas and power supply plan is the same plan that has been in place since 2022; however, to be consistent across plans and jurisdictions, a new naming convention has been applied to the existing plan. The future natural gas fuel supply plan will be identical to the plan filed in Kansas (for Evergy Kansas Central) and that will be filed in Missouri (for Evergy Missouri West). Evergy Metro is proposing that both plans activity flow through the FAC.

Q: Please explain what you mean by the existing natural gas and power supply plan.

A: The existing natural gas and power supply plan for Evergy Metro is in place to help lessen the volatility of spot natural gas prices and power prices on realized fuel and purchased power costs for the customer. A notice to perform this activity was filed in 2022 and continues to be in effect for Evergy Missouri Metro customers. As discussed at the onset of the plan, given the current generation stack of Evergy Metro compared to the load, transactions under this plan would be minimal. In fact, there have been no natural gas or power purchase transactions under this plan for Evergy Missouri Metro. However, as the generation fleet and/or load expectations change over time, it is possible that transactions could be necessary under this plan.

Q: Given that the name of the existing plan changed, does that mean the plan itself changed?

A: No. The mechanics of the plan remain the same. Evergy Metro will continue to develop a jurisdictional net position utilizing PROMOD. A jurisdictional net position is simply the forecasted hourly generation output for the period compared against an hourly load demand for the period. The modeling utilizes normalized weather, normalized wind forecasts, and the plan will continue to utilize the following products: financial gas, physical gas, financial power, physical power, and options. **[redacted]

[redacted]**.

Q: Please explain what the future natural gas fuel supply plan will be.

A: Evergy Metro is working on a future fuel supply plan to be consistently used across all Evergy jurisdictions as new combined cycle natural gas fired generation ("CCGT") is added to the generation fleet to meet load growth. The purpose of the future plan is to reduce both deliverability risk and price risk of natural gas supply specifically for the new CCGTs. Evergy continues to evaluate the new fuel supply plan and will have the final details of the plan in place later in 2026, which is well ahead of the Commercial Operation Date ("COD") on any announced CCGTs. If and when this impacts Evergy Metro, Evergy will incorporate the implementation of the future fuel supply plan at the appropriate time, corresponding with the commercial operation date of the new generation. The future plan would not replace the existing natural gas and power supply plan at COD of any new CCGT generation but would require updates to account for the change in the generation stack. Ultimately, the underlying goal of both plans and products utilized are similar, which is to spread transactions out over a longer time horizon to minimize exposure to the volatility of spot purchase pricing. However, the difference is the future plan will focus specifically on the fuel supply needs of the new CCGTs and the existing plan will continue to focus on the net position of Evergy Metro that compares the expected generation to expected load.

Q: Will the gains and losses associated with the natural gas fuel supply plans flow through the FAC?

A: Yes. The existing plan's purpose is to reduce exposure to volatility in the natural gas and/or purchased power markets, while ensuring a portion of the natural gas and/or power

requirements are available when needed. This provides for balance, consistency, and ensures that only appropriate levels of net costs are charged to customers. Similarly, the future plan's purpose is to reduce exposure to volatility in the natural gas markets for any new CCGTs, while ensuring a portion of the natural gas requirements are available when needed. This, too, provides for balance, consistency, and ensures the only appropriate level of net costs are charged to customers. The costs and benefits associated with both programs intended to protect the interests of the Company's customers by lowering exposure to severe market fluctuations are appropriately included in the cost of fuel and purchased power in the FAC.

Q: Please explain why continued forward procurement activities are prudent.

A: As Schedule JLT-2 demonstrates, since 2016, pricing volatility has been observed at times in the natural gas market. The volatility observed in both the international and domestic natural gas markets is being driven by multiple factors including the lack of investment in natural gas infrastructure, geopolitical issues, government policy, growth in liquid natural gas export capabilities, extreme weather events, build-out of renewable generation, and the retirement of coal generators, among other things. Evergy Metro believes it is prudent to have the ability to offset the risk of volatile natural gas pricing and its resulting impact on power prices. It is Evergy Missouri Metro's recommendation that physical gas, financial gas, physical power, financial power, and option products are approved for inclusion in the fuel adjustment clause. With these tools, Evergy Metro will be able to better protect to an expected price of natural gas and/or remove a portion of the negative impact on the price of purchased power from significant increases in the cost of natural gas. The intent of forward procurement is not that the product always results in lowest cost or always

generates a profit. In most situations, the greatest benefit to a portfolio is if a forward transaction, when viewed in isolation, loses money or is not the lowest cost. It would stand to reason that the rest of the portfolio benefits from the directional move in natural gas and/or purchased power. One does not know how market pricing will behave until after settlement. Therefore, the focus is to diversify a known price volatility risk. Much like homeowner's insurance, the product is not designed to financially benefit from, but rather to protect the owner from negative, unexpected financial impacts.

2. Market Impact on Fuel Costs is Substantial

Q: How might market price volatility affect Evergy Metro?

A: As noted above, because approximately ** [redacted] **of Evergy Metro's expected coal burn is not under contract over the four-year period of 2027 through 2030, Evergy Metro is exposed to coal price risk. Additionally, as previously noted, Evergy Metro is exposed to adverse natural gas and oil commodity price risk for 2027 through 2030. Furthermore, in addition to the risk around the cost of fuel itself, there is associated risk to purchased power costs.

Q: Why did you look at the four-year period of 2027 through 2030?

A: 20 CSR 4240-20.090(10)(A) requires a utility with a rate adjustment mechanism to file a general rate case with the effective date of new rates to be no later than four years after the effective date of the Commission's order implementing the rate adjustment mechanism. Given that Evergy Missouri Metro expects the effective date of the Commission order for this case to be early January 2027, the four-year horizon would run from January 2027 into January 2031. Fuel requirements for calendar years 2027 through 2030 are reasonably representative of that period.

3. Fuel Costs Are Beyond the Control of Management

Q: Can Evergy Metro control the fundamentals that drive the fuel markets?

A: No. Evergy Metro cannot control the market fundamentals for fuel. Perhaps an easy and somewhat objective way to answer that question is to look at what portion of the market Evergy Metro represents. Evergy Metro's projected coal burn for 2026 represents roughly 2.7% of the projected PRB production or about 1.2% of total U.S. coal production. Evergy Metro's projected 2026 natural gas usage is roughly 0.02% of U.S. natural gas production. Both of these markets are driven by factors other than Evergy Metro's market share.

Q: What are the fundamental drivers for the fuel markets?

A: The fundamental drivers for the short-term market are different than the key drivers for the long-term market. Short-term markets reflect the convergence of changes in demand expectations and the fundamentals of readily available or stored energy. Some of the short-term fundamental drivers would include events such as storms that might disrupt immediate delivery of the energy. Temperature spikes or drops can also cause short-term imbalances between the demand and the immediately available supply. These weather induced imbalances can cause significant price spikes, especially for natural gas and electricity because of their limited storage.

Long-term markets reflect the convergence of expectations of future potential supply, including the cost to produce that supply and future potential demand. For example, throughout much of the prior decade, the development of shale-based natural gas resources greatly increased the expected supply of natural gas. That in turn depressed the long-term outlook for natural gas prices. Recently, that narrative has shifted to one of demand growth exceeding supply growth and fuel prices are higher as a result. Because most natural gas

consumers have inelastic demands, but do not have storage, the short-term fundamentals will still drive significant market uncertainty, just at a higher base level than expected compared to the era of shale gas development.

IV. 20 CSR 4240-20.090(2)(A) REQUIREMENTS

Q: When an electric utility files a general rate proceeding following the general rate proceeding that established its rate adjustment mechanism ("RAM") and requests that its RAM be continued or modified, Commission rule 20 CSR 4240-20.090(2)(A) requires the electric utility file certain supporting information as part of, or in addition to, its direct testimony. Which of those requirements will you address?

A: I will address requirement 12 and explain the rate volatility mitigation features in Evergy Missouri Metro's FAC. I will also address the parts of requirement 17 focused on emissions management policy, emissions allowances purchases, and emissions allowances sales. The direct testimony of Company witness Hsin Foo will address the other part of requirement 17 regarding forecasted environmental investments.

1. Requirement 12: Mitigating Fuel Market Risk (Price Volatility)

Q: Does Evergy Metro mitigate price risk?

A: Evergy Metro lessens the severity of market price risk through its fuel procurement strategies**.**

Q: Does Evergy Metro have a program or strategy for managing the price risk of coal?

A: Yes, it does.

Q: Please describe how Evergy Metro mitigates coal price risk.

A: In the PRB coal market, the primary means of managing price risk is through a portfolio of forward contracts. Generally, Evergy Metro has been following a strategy of laddering

into a portfolio of forward contracts for PRB coal. Laddering is an investment technique of purchasing multiple products with different maturity dates. Evergy Metro's "laddered" portfolio consists of forward contracts with staggered terms so that a portion of the portfolio will roll over each year. That strategy may be modified when there are anticipated market price increases, and the choice may be made to either commit for more coal before the increase, or delay committing until after the increase has waned.

Q: What does that laddered portfolio look like?

A: By January 2026, Evergy Metro had approximately ** [redacted] ** of its expected coal requirements for 2026 and ** [redacted] ** of its expected coal requirements for 2027. It also had commitments for approximately ** [redacted] ** of its expected coal requirements for 2028, and ** [redacted] ** for 2029. However, Evergy Metro has ** [redacted] ** for 2030.

Q: Does Evergy Metro update its fuel procurement and planning process to adjust for changes in the marketplace?

A: Yes. Evergy Metro routinely reviews fuel market conditions and market drivers. It monitors market data, industry publications, and consultant reports in an effort to avoid high prices and to take advantage of lower prices.

Q: How has this strategy performed for Evergy Metro?

A: For the 2022 – 2025 timeframe, this strategy has helped Evergy Metro to mitigate any potential coal market volatility while securing reliable supply at the same time. If Evergy Metro calculates volatility as the standard deviation of average annual coal prices paid by it, the standard deviation of the average annual coal prices paid by Evergy Metro was

$0.0804/MMBtu. That is less than the $0.1102/MMBtu standard deviation of the average annual strip prices for the same timeframe.

Q: Please describe how Evergy Metro mitigates price risk for nuclear fuel.

A: Evergy Metro is one of the owners of the Wolf Creek nuclear unit which purchases uranium and has it processed for use as fuel in the plant's reactor. This process involves conversion of uranium concentrates to uranium hexafluoride, enrichment of uranium hexafluoride, and fabrication of nuclear fuel assemblies. The owners have under contract **[redacted]**.

Q: Please describe how Evergy Metro will mitigate some price risk for natural gas and purchased power.

A: As discussed above, Evergy Metro has proposed to continue natural gas and power forward procurement activities on a go-forward basis.

2. Requirement 17: Emissions Management Policy, Emissions Allowances Purchases, and Emissions Allowances Sales

Q: What is the purpose of this portion of your testimony?

A: I will discuss the legal requirements for emissions allowances and explain Evergy Missouri Metro's current emissions management policy and strategy for meeting those requirements.

Q: For which pollutants is Evergy Missouri Metro required to hold sufficient emission allowances?

A: Evergy Missouri Metro is required to hold sufficient SO_2 and NO_x allowances for each affected facility. These allowances are issued by the Environmental Protection Agency ("EPA").

Q: Describe Evergy Missouri Metro's emissions management policy.

A: Evergy Missouri Metro maintains dedicated internal resources to oversee and maintain the various allowance accounts under each regulatory program. Annually, the Company ensures enough allowances are in each facility account to cover the emissions from each affected unit for the applicable calendar year. All allowance transactions are approved by the management team overseeing the process, which include both the Acid Rain Program ("ARP") and the Cross-State Air Pollution Rule ("CSAPR") Designated Representative and Alternate Designated Representative.

Q: What rules or regulations establish the need for emissions allowances?

A: Title IV of the 1990 Clean Air Act Amendments established the allowance market system known today as the Acid Rain Program. Title IV set a nationwide cap on total SO_2 emissions and aimed to reduce overall emissions by approximately 50% of 1980 levels. In 2011, the EPA finalized the Cross-State Air Pollution Rule. The CSAPR limits the interstate transport of SO_2 and NO_x emissions from affected states that the EPA has determined interfere with the ability of other states to attain particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) and ozone National Ambient Air Quality Standards ("NAAQS").

The ARP and the CSAPR are allowance trading programs, and any facility specific shortages can be addressed by trading allowances within or outside Evergy Missouri Metro's system. The Company anticipates that the ARP annual SO_2 allowances and the CSAPR annual NO_x and SO_2 allowances will be readily available because of the significant reduction in coal generation since the original rules were issued driven by the impact of renewable generation development, the natural gas market, and unit retirements. However,

because of the continued ratcheting down of the CSAPR ozone season NO_x program, ozone season NO_x allowances may not be as readily available in the future. Currently, Evergy Missouri Metro has a sufficient supply of banked ozone season NO_x allowances for future utilization.

It is important to note that the ARP allowances cannot be used to comply with the CSAPR and vice versa.

Q: Will emissions allowance costs or sales margins be included in the FAC?

A: Yes.

Q: What are Evergy Missouri Metro's forecasted allowance purchases and sales?

A: In general, Evergy Missouri Metro is not expecting to purchase emission allowances nor is it proposing to sell notable volumes of emission allowances. Small quantities of allowances may be sold to joint partners at market prices should the need arise. If the Company's needs change, allowances will be purchased as required. Evergy Missouri Metro may reconsider this position in light of future changes in the laws, rules, or regulations governing emission allowances.

V. CONCLUSION

Q: Please summarize your testimony.

A: My testimony supports the inclusion of prudently incurred fuel and fuel-related costs in the Cost of Service, which are necessary for reliable generation. I have also explained that continuing the FAC is critical because of the significant and ongoing volatility in fuel markets. To address this volatility, Evergy Metro utilizes a diversified portfolio of risk mitigation strategies, including forward contracts and strategic inventory management. These measures demonstrate prudent management by balancing cost, reliability, and risk

in a challenging environment. In summary, the proposed methods for fuel cost recovery are reasonable and in the best interest of customers, ensuring Evergy Metro can continue providing reliable service.

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 JESSICA L. TUCKER

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Jessica L. Tucker, being first duly sworn on his oath, states:

1. My name is Jessica L. Tucker. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Senior Manager, Fuels & Emissions.

2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Evergy Missouri West consisting of thirty-six (36) 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.

Jessica L. Tucker

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

Notary Public

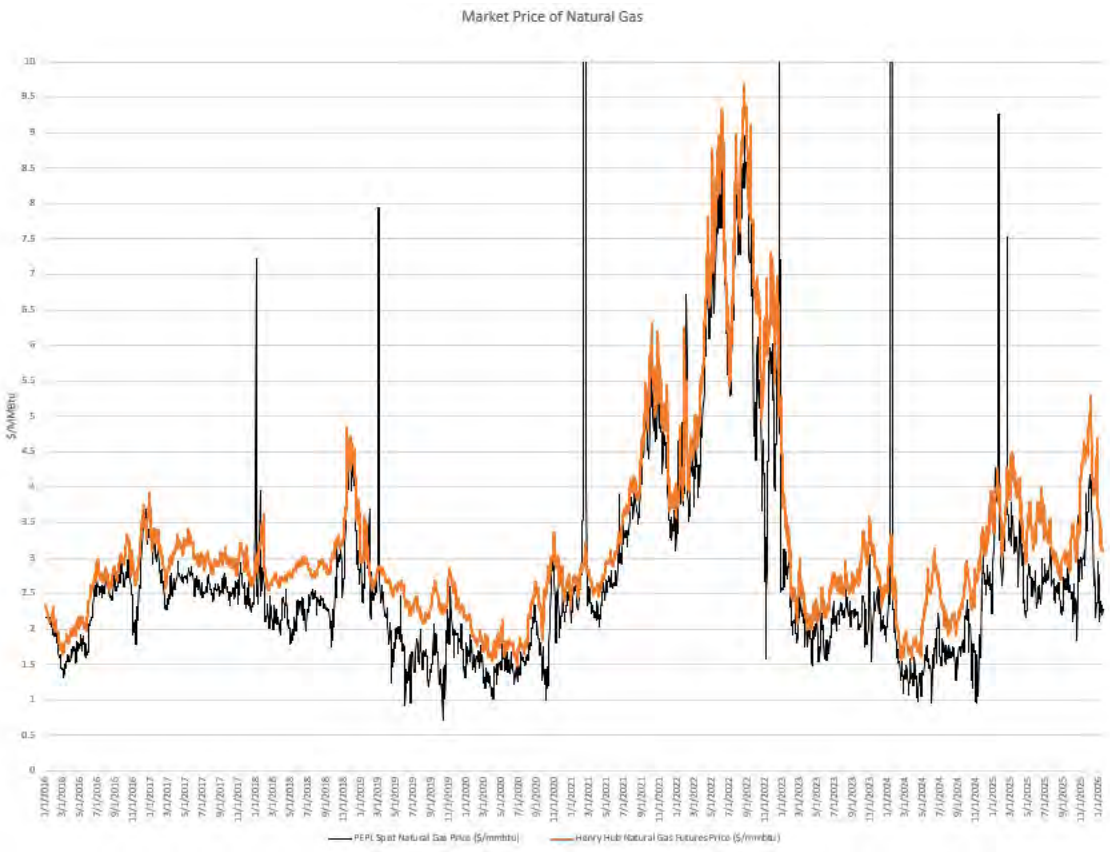
My commission expires: April 29, 2026

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

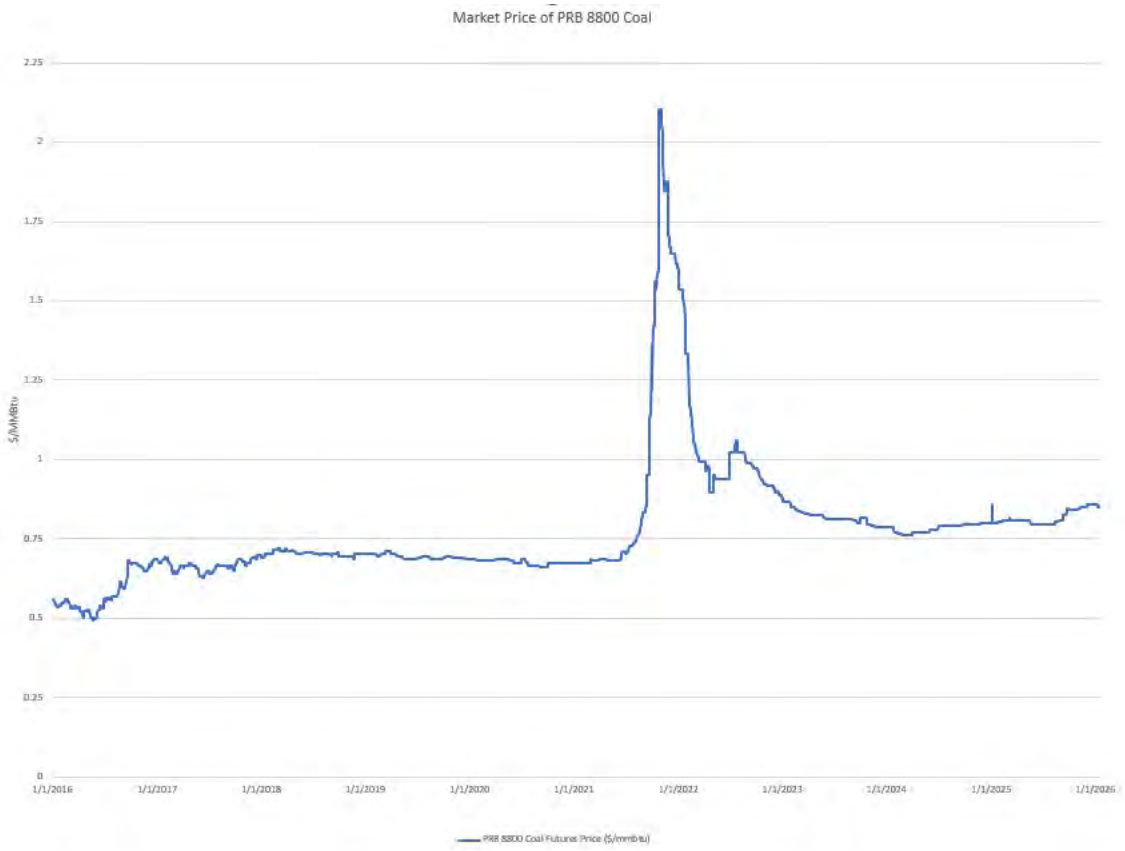
SCHEDULE JLT-1
CONTAINS CONFIDENTIAL INFORMATION
NOT AVAILABLE TO THE PUBLIC.

ORIGINAL FILED UNDER SEAL.

SCHEDULE JLT-2



SCHEDULE JLT-3



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**
Tucker Direct, p. 25, lns. 4 and 6	3, 5, and 6
Tucker Direct, p. 26, lns. 18-22 and p. 27, lns. 1-2	3, 5, and 6
Tucker Direct, p. 29, ln. 10	3, 5, and 6
Tucker Direct, p. 32, lns. 8-12	3, 5, and 6
Tucker Direct, p. 33, lns. 7-9	3, 5, and 6
Schedule JLT-1	3, 5, and 6

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.