Exhibit No.:
Issue: Allocations
Witness: John Wolfram
Type of Exhibit: Direct Testimony
Sponsoring Party: Evergy Missouri Metro
Case No.: ER-2026-0143
Date Testimony Prepared: February 6, 2026

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. ER-2026-0143

DIRECT TESTIMONY

OF

JOHN WOLFRAM

ON BEHALF OF

EVERGY MISSOURI METRO

Kansas City, Missouri
February 2026

TABLE OF CONTENTS

DIRECT TESTIMONY

OF

JOHN WOLFRAM

Case No. ER-2026-0143

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.

A. My name is John Wolfram. I am the founder and Principal of Catalyst Consulting LLC, a rate and regulatory consulting firm. My business address is 3308 Haddon Road, Louisville, Kentucky, 40241.

Q. ON WHOSE BEHALF ARE YOU SUBMITTING THIS TESTIMONY?

A. I am testifying on behalf of Evergy Metro, Inc. d/b/a as Evergy Missouri Metro ("Evergy Missouri Metro," "EMM," or the "Company"), a subsidiary of Evergy, Inc. ("Evergy").

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.

A. I received a Bachelor of Science degree in Electrical Engineering from the University of Notre Dame in 1990 and a Master of Science degree in Electrical Engineering from Drexel University in Philadelphia, PA, in 1997. I have also completed numerous professional education courses throughout my career, including the Leadership Louisville program in 2006.

Q. PLEASE DESCRIBE YOUR BUSINESS EXPERIENCE.

A. I began my career in 1990 as an engineer with PJM Interconnection, L.L.C. ("PJM"), where I implemented energy management systems for the reliable operation of the multi-state transmission grid. I left PJM to work with Cincinnati

Gas & Electric Company in 1993 on a similar project before returning to PJM in 1994 during the deregulation of the electric wholesale market. I implemented new practices and tools for PJM in conjunction with FERC Order Nos. 888 and 889.

In 1997, I joined Louisville Gas & Electric Company ("LG&E"), first in the Energy Trading group and then in the Generation Planning department, where I produced least-cost planning assessments and written testimony for state approval for new power plants. As Manager of Regulatory Affairs for LG&E and Kentucky Utilities Company ("KU"), I directed strategic regulatory initiatives with FERC and with regulators in Kentucky and Virginia, including rate cases, certificates of public convenience and necessity and transmission siting proceedings, compliance & management audits, regional transmission organization membership, and hydroelectric power plant relicensing. I then served as Director of Customer Service & Marketing for LG&E and KU, where I was responsible for all facets of customer interaction, including marketing, major accounts, walk-in offices, call centers, customer inquiries, negotiation of franchise agreements, economic development, and energy efficiency program design and implementation.

In 2010, I joined The Prime Group, LLC, a rate and regulatory consulting firm, as a Senior Consultant.

In 2012, I founded Catalyst Consulting LLC, a rate and regulatory consulting firm specializing in utility rate cases, tariffs and complex regulatory matters. In this role, I provide consulting services to electric utilities on matters related to rate design, cost of service studies, revenue requirements, open access

transmission tariffs, RTO membership, formula rates, special rate structures, and other rate or regulatory matters.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE COMMISSION?

A. Yes. A complete listing of my testimony is provided in Schedule JW-1.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to

1) Explain the need for jurisdictional allocators and provide an overview of the approach;
2) Describe the primary allocators;
3) Expound on the proposal for the Demand allocator for production and transmission costs;
4) Describe the derived allocators.

Q. ARE YOU SPONSORING ANY EXHIBITS OR SCHEDULES?

A. Yes. I have prepared the following schedules to support my testimony:

Schedule JW-1 – Qualifications of John Wolfram

Schedule JW-2 – Jurisdictional Demand Allocator Analysis

II. JURISDICTIONAL ALLOCATION

Q. WHY IS IT NECESSARY TO ALLOCATE REVENUES, EXPENSES AND RATE BASE TO THE EVERGY 'S VARIOUS JURISDICTIONS?

A. Evergy Metro operates a single, comprehensive system for its Kansas, Missouri, and firm wholesale jurisdictions. It operates a single production and transmission system that is used to provide service to retail customers in Missouri and Kansas, as well as the full requirements of firm wholesale customers. While some revenue, expense and/or rate base items may be directly assigned to particular jurisdictions,

many others cannot; therefore, jurisdictional allocations of operating expenses, certain operating revenues and rate base are necessary.

Q. WHY IS THE METHOD BY WHICH THE ALLOCATIONS ARE MADE IMPORTANT?

A. The method of allocation is critical to ensure that the rates charged to customers in each jurisdiction reflect the actual cost of serving those customers without reflecting the cost of serving customers in other jurisdictions. Simultaneously, the method of allocation should allow the Company the opportunity to fully recover its prudently incurred costs of serving those customers. Regulated utilities are entitled to a reasonable opportunity to recover their prudently incurred costs and are entitled to earn a fair and reasonable rate of return on their capital investments. If the sum of the allocation factors allowed in each jurisdiction is less than 100%, then the Company will not have a reasonable opportunity to recover its prudently incurred cost of service and return on rate base.

Q. WHAT ALLOCATORS DID THE COMPANY USE?

A. The allocators that were used can be classified as primary allocators and derived allocators. The primary allocators are based on weather-normalized demand and energy amounts, as well as customer information, for the twelve-month test period in this case. This data is described in more detail in the direct testimony of Company witness Albert R. Bass ("Bass Testimony"). The derived allocators are, at their roots, based on the Demand, Energy, and Customer allocators. The derived allocators are calculated as a combination of amounts that have previously been allocated using one or more of the primary allocators and/or in combination with amounts that are directly assignable. The jurisdictional allocators are noted in the

direct testimony of Company witness Ronald A. Klote ("Klote Testimony"). I discuss these in more detail in the sections that follow.

III. PRIMARY ALLOCATORS

Q. WHAT ARE THE PRIMARY ALLOCATORS?

A. The primary allocators are the Customer allocator, the Energy allocator, and the Demand allocator.

Q. PLEASE DESCRIBE THE CUSTOMER ALLOCATOR.

A. The Customer allocator is based on the average number of customers in Missouri, Kansas, and the firm wholesale jurisdiction for the test period. Specifically, the allocator is determined as the jurisdictional share of the average number of electric customers for the twelve months ended June 30, 2025, including customer growth projected to June 2026. These values are supported in the Bass Testimony.

Q. IS THE CUSTOMER ALLOCATOR DETERMINED IN A MANNER CONSISTENT WITH THE MOST RECENT COMPANY RATE FILING WITH THIS COMMISSION?

A. Yes.

Q. PLEASE DESCRIBE THE ENERGY ALLOCATOR.

A. The Energy allocator is based on the total weather-normalized kilowatt-hour ("kWh") usage by the Missouri and Kansas retail customers and the firm wholesale jurisdiction for the twelve months ended June 30, 2025, including customer growth projected to June 2026. These amounts are also supported in the Bass Testimony.

Q. IS THE ENERGY ALLOCATOR DETERMINED IN A MANNER CONSISTENT WITH THE MOST RECENT COMPANY RATE FILING WITH THIS COMMISSION?

A. Yes.

Q. PLEASE DESCRIBE THE DEMAND ALLOCATOR.

A. The Demand allocator for production and transmission costs is based on coincident peak demand data for the Missouri and Kansas retail jurisdictional customers and the firm wholesale jurisdiction for the twelve month period from July 2024 through June 2025. The weather normalized coincident peak demands include losses and customer growth projected to June 2026, as supported in the Bass Testimony. Two Demand allocators are used for transmission and production costs by the Company in this case. One is calculated as the average of the coincident peak demand for twelve months ("12 CP"). The Company proposes using the 12 CP allocator for Transmission demand costs. The other Demand allocator is calculated as the average of (i) the average of coincident peak demands for four months ("4 CP") and (ii) the 12 CP amount.[1] The Company proposes using this allocator for production demand costs.

[1] References herein to any demand allocation of "*n* CP" means the use of *n* months of Coincident Peak demand to determine the apportionment of demand costs for integer *n* between 1 and 12.

Q. IS THE DEMAND ALLOCATOR DETERMINED IN A MANNER CONSISTENT WITH THE MOST RECENT COMPANY RATE FILING WITH THIS COMMISSION?

A. No. While part of the determination is consistent, the overall approach represents a change from what the Commission approved in the Company's most recent rate filing. I will explain this approach further in the next section of my testimony.

IV. DEMAND ALLOCATOR

Q. WHAT IS THE PURPOSE OF THE DEMAND ALLOCATOR?

A. The Demand allocator determines what portion of the Company's fixed production and transmission cost is assigned to the Missouri retail jurisdiction and what portion is assigned to the Kansas retail and the wholesale jurisdictions. The fixed costs in question (also referred to as "capacity costs") are those classified as demand-related, or those costs that vary with the KW demand imposed by the customer.[2]

Q. IS THE ALLOCATION OF DEMAND COSTS PARTICULARLY CHALLENGING?

A. Yes. In his treatise "Principles of Public Utility Rates," James Bonbright observes the following about capacity costs:

> Of all of the many problems of rate making that are bedeviled by unresolved disputes about issues of fairness, the one that deserves first rank for frustration is that concerned with the apportionment among different classes of consumers of the demand costs or capacity costs.[3]

[2] National Association of Regulatory Utility Commissioners *Electric Utility Cost Allocation Manual*, January 1992, ("NARUC CAM") pg. 20.
[3] Bonbright, James C, *Principles of Public Utility Rates*, Columbia University Press, New York NY, 1961, p. 184.

The challenge of apportionment among different classes of consumers similarly applies to the apportionment among different jurisdictions. It can be difficult because the notion of what parameters reasonably represent how costs vary with capacity, or the "size" of facilities like power plants or transmission lines, is less readily deduced than the amount of power consumed (Energy allocator) or the number of customers taking service (Customer allocator).

Q. HOW HAS THE DEMAND ALLOCATOR BEEN ADDRESSED IN PREVIOUS RATE FILINGS?

A. In Missouri, prior to 1983, the Company allocated jurisdictional demand costs using 1 CP. Since then, in twelve different rate proceedings between 1985 and 2022, and given numerous different proposals by the Company, Staff of the Commission ("Staff"), and intervenors in those cases, all of the Commission orders (in settled cases and otherwise) have implemented a Demand allocator in Missouri based on 4 CP.

In the Kansas jurisdiction, the Company used a 7 CP Demand allocator prior to 1983. Then, in ten different rate proceedings between 1985 and 2018, and again given numerous proposals by parties to those cases, all of the Kansas Corporation Commission ("KCC") orders (in settled cases and otherwise) have implemented a Demand allocator based on 12 CP. Most recently, in 2023, the KCC accepted a settlement that adopted the KCC Staff position in that case, in which the parties agreed that for purposes of allocating capacity-related generation and transmission plant costs between the Missouri and Kansas jurisdictions that an average of 4 CP

and 12 CP demand allocators would be used "for everything but Wolf Creek and transmission, which will be based on a 12 CP demand allocator."[4]

Q. WHAT DOES THE COMPANY SPECIFICALLY PROPOSE FOR THE DEMAND ALLOCATOR IN THIS CASE?

A. Because the Missouri Commission has historically approved the use of 4 CP and the KCC has historically approved a combination of 12 CP (for Wolf Creek and Transmission) and the simple average of 4 CP and 12 CP (for production demand other than Wolf Creek), the Company proposes to allocate demand in this case using the arithmetic average of the 4 CP and 12 CP calculations, except for Transmission, which will use 12 CP. These calculations are shown in Schedule JW-2.

Q. IS THIS THE SAME APPROACH THAT RESULTED FROM EVERGY METRO'S LAST RATE CASE IN KANSAS?

A. No, but it is close. In the Kansas case the result was to apply the average of 4 CP and 12 CP to the capacity costs except Wolf Creek and Transmission, which used 12 CP. In this case the proposal applies the average of 4 CP and 12 CP to the capacity costs except Transmission – so it does not treat Wolf Creek differently than all other production demand. In other words, it is the same as the outcome of the last case in Kansas except for the treatment of Wolf Creek.

[4] Order Approving Unanmimous Stipulation & Agreement at 5, Kansas Corporation Commission, Docket No. 23-EKCE-775-RTS, (Nov. 21, 2023).

Q. WHAT IS THE COMPANY'S GOAL WITH RESPECT TO THE DEMAND ALLOCATOR?

A. The goal of the Company with respect to the Demand allocator is to secure approval by both this Commission and the KCC of a single, comprehensive determination of the jurisdictional Demand allocators to be consistently applied in both of the retail jurisdictions of Evergy Missouri Metro and Evergy Kansas Metro (collectively "Evergy Metro"). This has been Evergy's stated goal in Missouri and Kansas rate cases since 2022 and will remain important so long as the allocation methods differ between the two jurisdictions.

The Company believes that jurisdictional harmony on this allocation is particularly important. It is possible that more than one allocation method would accurately and fairly allocate costs to the jurisdictions. Evergy believes that the same allocation method can be used in both jurisdictions and can result in fair, just and reasonable allocations for all customers. Evergy is moving toward that goal in this case.

The equitable, consistent allocation of Evergy Metro's demand costs between the two retail jurisdictions will ensure that the rates charged to customers in each jurisdiction reflect the actual cost of serving those customers while also allowing Evergy Metro the opportunity to fully recover the prudently incurred costs of serving those customers.

Q. IS EVERGY METRO COMMITTED TO MOVING AWAY FROM THE HISTORICAL, EXCLUSIVE USE OF EITHER 4 CP OR 12 CP TO ALLOCATE DEMAND COSTS?

A. Not necessarily. However, Evergy Metro is committed to achieving jurisdictional harmony, and a combination of 4 CP and 12 CP appears to be a practical method for achieving that end, in part based on the result of the last Evergy Metro's rate case in Kansas.

Q. DID THE 2023 KANSAS RATE ORDER ENCOURAGE THE COMPANY TO WORK WITH BOTH JURISDICTIONS TO TRY TO ADVANCE THE ISSUE OF JURISDICTIONAL HARMONY?

A. Yes. The Settlement Agreement in that case states the following:

> The Parties agree that the distribution situs has been updated for purposes of determining the allocator between Missouri and Kansas. Staff and CURB agree to continue to meet with Missouri Public Service Commission Staff and the Office of Public Counsel to discuss jurisdictional allocation methodologies as occurred earlier this year.
>
> The parties agree that the above-described allocator methodology is intended to facilitate a collaborative process with Missouri to attempt to arrive at an agreeable jurisdiction allocator methodology for Kansas and Missouri.

While this rate order in Kansas does not bind any parties in Missouri, it does reflect the notion that a collaborative effort to achieve jurisdictional harmony on cost allocation is an important and worthwhile endeavor. These efforts are described in the Klote Testimony.

Q. IS THERE A CONVENTIONAL APPROACH IN UTILITY RATEMAKING TO DETERMINING WHETHER 12 CP IS APPROPRIATE?

A. To a considerable extent, yes. The Federal Energy Regulatory Commission ("FERC") has adopted three different tests ("FERC Tests") to assess whether a 12 CP demand allocation is appropriate. The FERC Tests were first established in FERC Opinion No. 501 issued on April 21, 2008. The three tests all involve mathematical comparisons using monthly coincident peak load data. Utilities have come to apply these tests before FERC and in other jurisdictions to assess whether demand costs should be allocated using 12 CP or using factors based on a more seasonal calculation.

Q. PLEASE DESCRIBE THE FERC TESTS.

A. Historically, FERC has considered three tests in determining whether a system is better characterized as 12 CP or something more seasonal.

The first test is the On and Off Peak test. Here, FERC compares the average of the system peaks during the purported peak period, as a percentage of the annual peak, to the average of the system peaks during the off-peak months, as a percentage of the annual peak. Generally, FERC has held that a nineteen percentage point or less difference between these two figures supports using the 12 CP method.

The second test is the Low-to-Annual Peak test. This involves the lowest monthly peak as a percentage of the annual peak. FERC considers a range of sixty-six percent or higher as indicative of a 12 CP system.

The third test is the Average to Annual Peak test, and it computes the average of the twelve monthly peaks as a percentage of annual peak. Generally, the range for a utility to be considered 12 CP is eighty-one percent or higher.[5]

Q. DID YOU APPLY THE THREE FERC TESTS IN THIS CASE?

A. Yes. I performed the tests using test period demand data to compare 12 CP to several other CP demand scenarios: 1 CP, 3 CP using June, July, and August; 3 CP using July, August and September; 4 CP; 6 CP; 8 CP; and 10 CP. I performed the tests for each Evergy jurisdiction (Missouri, Kansas, and wholesale) as well as for total. The analysis and results are provided in Schedule JW-2.

Q. WHAT DO THE TEST RESULTS INDICATE?

A. The test results indicate that using a seasonal peak determination is more appropriate than using 12 CP for determining the Demand allocator. This is the case in every scenario for all jurisdictions, as indicated in Schedule JW-2.

Q. DOES THIS MEAN THAT THE COMPANY SHOULD SIMPLY USE THE 4 CP METHOD AS IT HAS IN THE PAST?

A. No. While the FERC Tests are a strong indicator for appropriate development of the Demand allocator, they are not the sole criteria to use when making this decision. FERC itself recognized that the full range of a company's operating realities should be considered along with peak demands, including scheduled maintenance, unscheduled outages, diversity, reserve requirements, and off-system sales commitments.[6] Simply adopting the 4 CP method due to the results of the FERC Tests would ignore significant factors relevant to the just and reasonable

[5] FERC Opinion 501 (123 FERC ¶ 61,047), paragraph 76.
[6] FERC Opinion 501 (123 FERC ¶ 61,047), paragraph 75.

determination of customer rates. Evergy considers jurisdictional harmony related to operating in two states to be one of these factors.

Q. IS THE PROPOSED APPROACH REASONABLE?

A. Yes. Given the importance of precedent in both jurisdictions, the nature and results of the FERC Tests, and other considerations that I describe herein, the proposed approach is a reasonable one aimed at bridging the current gap between the jurisdictional history of Evergy Missouri Metro operating in Missouri and Evergy Kansas Metro operating in Kansas. The method is consistent with traditional ratemaking principles, is objective, and is consistent with the treatment afforded other utilities that operate in multiple retail jurisdictions. As such, the approach is just and reasonable.

Q. HOW IS THE DEMAND ALLOCATOR CONSISTENT WITH TRADITIONAL RATEMAKING PRINCIPLES?

A. In the aforementioned treatise *Principles of Public Utility Rates*, James Bonbright established several attributes of a sound rate structure for utilities. These attributes have been largely adopted or affirmed by energy regulators across the country for many decades. Bonbright's attributes of a sound rate structure include the following:

1) Rates should have the following practical attributes: simplicity, certainty, convenience of payment, economy in collection, understandability, public acceptability, and feasibility of application;

2) Rates should be free from controversies as to proper interpretation;

3) Rates should effectively yield total revenue requirements under the fair return standard;

4) Rates should provide revenue stability from year to year;

5) Rates themselves should be stable, i.e., rates should experience minimal unexpected changes that are seriously adverse to existing customers;

6) Rates should apportion the total cost of service fairly among different consumers;

7) Rate relationships should avoid "undue discrimination";

8) Rates should promote efficiency, discouraging wasteful use of energy while promoting all justified types and amounts of use;

9) Rates should have dynamic efficiency in promoting innovation and responding economically to changing demand and supply patterns;

10) Rates should reflect all of the present and future private and social costs and benefits occasioned by a service's provisions (i.e., all internalities and externalities.); [7]

The Demand allocator is plainly consistent with the first seven of these attributes as follows:

1) As the arithmetic average of two common approaches to allocating capacity costs, the Demand allocator is simple, understandable, publicly acceptable, and feasible to apply;

2) As a simple average, the Demand allocator is free from controversies as to proper interpretation;

3) As a consistent approach across two jurisdictions, the Demand allocator will develop rates that should effectively yield total revenue requirements under the fair return standard;

4) The averaging of two methods in the Demand allocator should provide revenue stability from year to year;

5) The averaging of two methods in the Demand allocator should yield rates that are stable with minimal unexpected changes adverse to customers;

6) A single, comprehensive Demand allocator will help the Company apportion the total cost of service fairly among different consumers;

7) The formulaic, objective approach of determining the Demand

[7] Bonbright, p. 383-384.

allocator should avoid "undue discrimination";

These points remain true for using the 12 CP for transmission. The approach does not violate any of the other attributes. For these reasons, the Demand allocator is consistent with traditional ratemaking principles.

Q. HOW IS THE DEMAND ALLOCATOR OBJECTIVE?

A. The Demand allocator is objective, not subjective, because it relies upon either the 12 CP value or the averaging of the 4 CP and 12 CP values without regard for what results the numeric values of either method yield for either jurisdiction. It is formulaic. The approach is process-based and is not driven by the outcome for one jurisdiction or another.

Q. HOW IS THE DEMAND ALLOCATOR CONSISTENT WITH OTHER UTILITIES THAT OPERATE IN MULTIPLE RETAIL JURISDICTIONS?

A. The same Demand allocator approach will be used in Evergy Metro's rate filings in both the Missouri and Kansas jurisdictions. Other companies that operate in multiple retail jurisdictions also use the same method in both jurisdictions (regardless of what that method is). For example, Liberty Utilities d/b/a The Empire District Electric Company uses the 12 CP allocator to assign capacity costs both in Missouri and in Kansas. Kentucky Utilities Company uses a single approach, the 12 CP method, to allocate capacity costs between its Kentucky affiliate and Old Dominion Power, its affiliate in Virginia.

Note that these examples using 12 CP do not invalidate the use of a 4 CP as an input to the calculation of the Demand allocator; rather, they reinforce the position that consistency across jurisdictions is important.

Q. GIVEN ALL OF THESE CONSIDERATIONS, HOW IS THE DEMAND ALLOCATOR FAIR, JUST, AND REASONABLE?

A. The Demand allocator as proposed embraces an approach aimed at bridging the current gap between the jurisdictional history of the Evergy Metro companies operating in both Missouri and Kansas. The method is consistent with traditional ratemaking principles, is objective, and is consistent with the treatment afforded other utilities that operate in multiple retail jurisdictions, and as such is fair, just, and reasonable.

Bonbright also notes that "the art of ratemaking is an art of wise compromise." [8] This effectively is what the Company seeks with this proposal for the Demand allocator.

Q. WOULD OTHER APPROACHES ALSO BE REASONABLE?

A. Yes. As noted, there is more than one reasonable way to allocate these costs between the Missouri and Kansas jurisdictions. Given the recent history of rate case outcomes, and the movement on this issue in the last rate order by the KCC, it would also be reasonable to adopt the method approved by the KCC in that case (i.e., using the simple average of 4 CP and 12 CP for most production demand, and using 12 CP for Wolf Creek and for transmission). This method also promotes jurisdictional harmony in a fair, just and reasonable manner. Furthermore, the Company would consider any other alternative acceptable to the Commission which could also secure the approval of the KCC such that jurisdictional harmony could be achieved.

[8] Bonbright, pg. 82.

Q. CAN THE IMPACT ON REVENUE REQUIREMENT OF OTHER APPROACHES BE QUANTIFIED?

A. Yes. As discussed above, Missouri has historically used the 4 CP Demand allocator, while Kansas had applied a 12 CP allocator prior to Evergy Kansas Metro's most recent rate case in that jurisdiction. In consultation with the Company, I understand that the use of a 4 CP allocator would result in a change to the revenue requirement of approximately $4.9 million, while the use of a 12 CP allocator would result in a change of approximately $3.7 million. Stated differently, the change to the revenue requirement if one of these methods were chosen would be less than 3.5% different than the requested rate request, demonstrating that the appropriate focus is the selection of a demand allocation methodology that is just, fair and reasonable, rather than the numerical outcome produced by any individual method.

V. DERIVED ALLOCATORS

Q. WHAT ARE THE DERIVED ALLOCATORS?

A. The derived allocators are those allocators calculated as a combination of amounts that have previously been allocated using one or more of the primary allocators, and/or using other determined allocators in combination with directly assignable amounts.

Q. HOW ARE THE DERIVED ALLOCATORS CALCULATED?

A. The derived allocators are calculated as a combination of amounts that have previously been allocated using one or more of the primary allocators and/or in combination with amounts that are directly assignable.

Q. ARE THE DERIVED ALLOCATORS DETERMINED IN A MANNER CONSISTENT WITH PAST COMPANY RATE FILINGS WITH THIS COMMISSION?

A. Yes.

Q. PLEASE EXPLAIN HOW THE VARIOUS REVENUE, EXPENSE AND RATE BASE COMPONENTS ARE ALLOCATED AMONG EVERGY METRO'S REGULATORY JURISDICTIONS.

A. A narrative summary of the method for determining the allocation of the Evergy Metro's revenue, expense, and rate base components is provided as a Schedule in Ronald Klote's direct testimony RAK-6.

VI. CONCLUSION

Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION?

A. Because Evergy Metro operates a single, comprehensive system for its Missouri, Kansas, and firm wholesale jurisdictions, Evergy Metro must allocate revenues, expenses, and rate base to the respective jurisdictions. The general methods proposed in this case for allocating these amounts are reasonable and have been accepted by this Commission in previous rate filings with one exception. The Demand allocator proposed herein relies upon a novel, but simple and straightforward approach, but one that enables an equitable, consistent allocation of demand costs between the Missouri and Kansas retail jurisdictions. Such an allocation will ensure that the rates charged to customers in each jurisdiction reflect the actual cost of serving those customers while allowing the utility a reasonable opportunity to fully recover the prudently incurred costs of serving those customers.

This compromise approach will bridge the current gap between the jurisdictional history of the Evergy Metro Missouri and Evergy Kansas Metro retail jurisdictions. The method is consistent with traditional ratemaking principles, is objective, is consistent with the treatment afforded other utilities that operate in multiple retail jurisdictions, and as such is just and reasonable.

For these reasons I recommend that the Commission accept the proposed jurisdictional allocators for use in developing the rates proposed in this proceeding and approve them as filed.

Q. DOES THIS 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 JOHN WOLFRAM

COMMONWEALTH OF KENTUCKY)
) **ss**
COUNTY OF JEFFERSON)

John Wolfram, being first duly sworn on his oath, states:

1. My name is John Wolfram. I work in Louisville, Kentucky, and I am employed as Principal of Catalyst Consulting LLC.

2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Evergy Missouri Metro consisting of twenty (20) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

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

John Wolfram

Subscribed and sworn before me this 21 day of January 2026.

Notary Public

My commission expires: 6-12-2029

ANNE L FOYE
Notary Public - State at Large
Kentucky
My Commission Expires Jun. 12, 2029
Notary ID KYNP29156

JOHN WOLFRAM

Summary of Qualifications

Provides consulting services to electric utilities regarding utility rate and regulatory filings, cost of service studies, wholesale and retail rate designs, tariffs and special contracts, formula rates, energy policy, and other matters.

Employment

CATALYST CONSULTING LLC — June 2012 – Present
Principal

THE PRIME GROUP, LLC — March 2010 – May 2012
Senior Consultant

LG&E and KU, Louisville, KY — 1997 - 2010
(Louisville Gas & Electric Company and Kentucky Utilities Company)
Director, Customer Service & Marketing (2006 - 2010)
Manager, Regulatory Affairs (2001 - 2006)
Lead Planning Engineer, Generation Planning (1998 - 2001)
Power Trader, LG&E Energy Marketing (1997 - 1998)

PJM INTERCONNECTION, LLC, Norristown, PA — 1990 - 1993; 1994 - 1997
Project Lead – PJM OASIS Project
Chair, Data Management Working Group

CINCINNATI GAS & ELECTRIC COMPANY, Cincinnati, OH — 1993 - 1994
Electrical Engineer - Energy Management System

Education

Bachelor of Science Degree in Electrical Engineering, University of Notre Dame, 1990
Master of Science Degree in Electrical Engineering, Drexel University, 1997
Leadership Louisville, 2006

Associations

Senior Member, Institute of Electrical and Electronics Engineers ("IEEE") & Power Engineering Society

Articles

"FERC Formula Rate Resurgence" *Public Utilities Fortnightly*, Vol. 158, No. 9, July 2020, 34-37.

"Economic Development Rates: Public Service or Piracy?" *IAEE Energy Forum*, International Association for Energy Economics, 2016 Q1 (January 2016), 17-20.

Presentations

"Utilities Driving Economic Development" panel discussion at the Mid-America Regulatory Conference, Jun. 2025.

“Utility Rates for the Modern Grid” presented as APPA Online Virtual Course, Apr. 2025

“Evolving Rate Structures: Adapting Co-op Rate Pricing Models for the Modern Grid” presented to CFC Independent Borrowers Executive Summit, Nov. 2024

“Aligning Rates with the Modern Grid” presented to APPA Business & Financial Conference, Sep 2024.

“Cooperative Rate Cases” presented to Kentucky Electric Coops Fall Managers’ Meeting, Oct. 2023.

“New Developments in Kentucky Rate Filings” presented to Electric Cooperatives Accountants' Association Summer Meeting, Jun. 2022.

“Avoiding Shock: Communicating Rate Changes” presented to APPA Business & Financial Conference, Sep. 2020.

“Revisiting Rate Design Strategies” presented to APPA Public Power Forward Summit, Nov. 2019.

“Utility Rates at the Crossroads” presented to APPA Business & Financial Conference, Sep. 2019.

“New Developments in Kentucky Rate Filings” presented to Electric Cooperatives Accountants' Association Summer Meeting, Jun. 2019.

“Electric Rates: New Approaches to Ratemaking” presented to CFC Statewide Workshop, Jan. 2019.

“The Great Rate Debate: Residential Demand Rates” presented to CFC Forum, Jun. 2018.

“Benefits of Cost of Service Studies” presented to Tri-State Electric Cooperatives Accountants’ Association Spring Meeting, Apr. 2017.

“Proper Design of Utility Rate Incentives” presented to APPA/Area Development’s Public Power Consultants Forum, Mar. 2017.

“Utility Hot Topics and Economic Development” presented to APPA/Area Development’s Public Power Consultants Forum, Mar. 2017.

“Emerging Rate Designs” presented to CFC Independent Borrowers Executive Summit, Nov. 2016.

“Optimizing Economic Development” presented to Grand River Dam Authority Municipal Customer Annual Meeting, Sept. 2016.

“Tomorrow’s Electric Rate Designs, Today” presented to CFC Forum, Jun. 2016.

“Reviewing Rate Class Composition to Support Sound Rate Design” presented to EEI Rate and Regulatory Analysts Group Meeting, May 2016.

“Taking Public Power Economic Development to the Next Level” presented to APPA/Area Development’s Public Power Consultants Forum, Mar. 2016.

“Ratemaking for Environmental Compliance Plans” presented to NARUC Staff Subcommittee on Accounting and Finance Fall Conference, Sep. 2015.

"Top Utility Strategies for Successful Attraction, Retention & Expansion" presented to APPA/Area Development's Public Power Consultants Forum, Mar. 2015.

"Economic Development and Load Retention Rates" presented to NARUC Staff Subcommittee on Accounting and Finance Fall Conference, Sep. 2013.

Expert Witness Testimony & Proceedings

FERC

Submitted direct testimony for Invenergy Grid Midwest LLC in FERC Docket No. ER26-859 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for Viridon Path 15, LLC in FERC Docket No. ER25-2707 regarding a proposed wholesale transmission rate.

Submitted direct testimony for Cheyenne Light, Fuel & Power Company in FERC Docket No. ER25-2171 regarding proposed revisions to a Transmission Formula Rate.

Submitted direct testimony for DATC Path 15, LLC in FERC Docket No. ER25-1310 regarding a proposed wholesale transmission rate.

Submitted testimony for Evergy Missouri, Inc., Evergy Metro, Inc., and Evergy Kansas Central, Inc. in FERC Docket Nos. ER25-206, ER25-207, and ER25-208 regarding proposed Wholesale Distribution Access Service rates.

Submitted direct testimony for Black Hills Colorado Electric, LLC in FERC Docket No. ER22-2185 regarding a proposed Transmission Formula Rate.

Submitted testimony for Evergy Kansas Central, Inc. and Evergy Generating, Inc. in FERC Docket Nos. ER22-1974-000, ER22-1975-000 and ER22-1976-000 regarding revised capital structures under transmission and generation formula rates.

Submitted affidavit for Constellation Mystic Power, LLC in FERC Docket No. ER18-1639-000 in response to arguments raised in formal challenges to an informational filing required for a cost-of-service rate for the operation of power plants in ISO New England.

Submitted direct testimony for El Paso Electric Company in FERC Docket No. ER22-282 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for TransCanyon Western Development, LLC in FERC Docket No. ER21-1065 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for Cleco Power LLC in FERC Docket No. ER21-370 regarding a proposed rate schedule for Blackstart Service under Schedule 33 of the MISO Open Access Transmission, Energy and Operating Reserve Markets Tariff.

Submitted direct testimony for Constellation Mystic Power, LLC in FERC Docket No. ER18-1639-005 supporting a compliance filing for a cost-of-service rate for compensation for the continued operation of power plants in ISO New England.

Submitted direct testimony for DATC Path 15, LLC in FERC Docket No. ER20-1006 regarding a proposed wholesale transmission rate.

Submitted direct testimony for Tucson Electric Power Company in FERC Docket No. ER19-2019 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for Cheyenne Light, Fuel & Power Company in FERC Docket No. ER19-697 regarding a proposed Transmission Formula Rate.

Supported Kansas City Power & Light in FERC Docket No. ER19-1861-000 regarding revisions to fixed depreciation rates in the KCP&L SPP Transmission Formula Rate.

Supported Westar Energy and Kansas Gas & Electric Company in FERC Docket No. ER19-269-000 regarding revisions to fixed depreciation rates in the Westar SPP Transmission Formula Rate.

Submitted direct testimony for Midwest Power Transmission Arkansas, LLC in FERC Docket No. ER15-2236 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for Kanstar Transmission, LLC in FERC Docket No. ER15-2237 regarding a proposed Transmission Formula Rate.

Supported Westar Energy and Kansas Gas & Electric Company in FERC Docket Nos. FA15-9-000 and FA15-15-000 regarding an Audit of Compliance with Rates, Terms and Conditions of Westar's Open Access Transmission Tariff and Formula Rates, Accounting Requirements of the Uniform System of Accounts, and Reporting Requirements of the FERC Form No. 1.

Submitted direct testimony for Westar Energy in FERC Docket Nos. ER14-804 and ER14-805 regarding proposed revisions to a Generation Formula Rate.

Supported Intermountain Rural Electric Association and Tri-State G&T in FERC Docket No. ER12-1589 regarding revisions to Public Service of Colorado's Transmission Formula Rate.

Supported Intermountain Rural Electric Association in FERC Docket No. ER11-2853 regarding revisions to Public Service of Colorado's Production Formula Rate.

Supported Kansas Gas & Electric Company in FERC Docket No. FA14-3-000 regarding an Audit of Compliance with Nuclear Plant Decommissioning Trust Fund Regulations and Accounting Practices.

Supported LG&E Energy LLC in FERC Docket No. PA05-9-000 regarding an Audit of Code of Conduct, Standards of Conduct, Market-Based Rate Tariff, and MISO's Open Access Transmission Tariff at LG&E Energy LLC.

Submitted remarks and served on expert panel in FERC Docket No. RM01-10-000 on May 21, 2002 in Standards of Conduct for Transmission Providers staff conference, regarding proposed rulemaking on the functional separation of wholesale transmission and bundled sales functions for electric utilities.

Kansas

Submitted direct and rebuttal testimony for Evergy Metro, Inc. in Docket No. 23-EKCE-775-RTS regarding a jurisdictional cost allocation in a retail rate case.

Submitted report for Westar Energy, Inc. in Docket No. 21-WCNE-103-GIE regarding plans and options for funding the decommissioning trust fund, depreciation expenses, and overall cost recovery in the event of premature closing of the Wolf Creek nuclear plant.

Submitted direct and rebuttal testimony for Westar Energy, Inc. in Docket No. 18-WSEE-328-RTS regarding overall rate design, prior rate case settlement commitments, lighting tariffs, an Electric Transit rate schedule, Electric Vehicle charging tariffs, and tariff general terms and conditions.

Submitted direct and rebuttal testimony for Westar Energy, Inc. in Docket No. 18-KG&E-303-CON regarding the Evaluation, Measurement and Verification ("EM&V") of an energy efficiency demand response program offered pursuant to a large industrial customer special contract.

Submitted report for Westar Energy, Inc. in Docket No. 18-WCNE-107-GIE regarding plans and options for funding the decommissioning trust fund, depreciation expenses, and overall cost recovery in the event of premature closing of the Wolf Creek nuclear plant.

Submitted direct and rebuttal testimony for Westar Energy, Inc. in Docket No. 15-WSEE-115-RTS regarding rate designs for large customer classes, establishment of a balancing account related to new rate options, establishment of a tracking mechanism for costs related to compliance with mandated cyber and physical security standards, other rate design issues, and revenue allocation.

Kentucky

Submitted direct testimony and responses to data requests on behalf of Kentucky Power Company in Case No. 2025-00257 regarding the zero intercept analysis in a base rate case.

Submitted direct testimony and responses to data requests on behalf of Clark Energy Cooperative in Case No. 2025-00230 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of sixteen distribution cooperative owner-members of East Kentucky Power Cooperative in Case Nos. 2025-00209 through 2021-00222 regarding rate design for the pass-through of a proposed wholesale rate revision.

Submitted direct and rebuttal testimony and responses to data requests on behalf of Farmers R.E.C.C. in Case No. 2025-00107 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony and responses to data requests on behalf of Blue Grass Energy in Case No. 2025-00103 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Cumberland Valley Electric in Case No. 2024-00388 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct and rebuttal testimony and responses to data requests on behalf of South Kentucky R.E.C.C. in Case No. 2024-00402 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony and responses to data requests on behalf of Shelby Energy Cooperative in Case No. 2024-00351 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony and responses to data requests on behalf of Jackson Energy Cooperative in Case No. 2024-00324 regarding revenue requirements, adjustments, cost of service and rate design in a streamlined rate case.

Submitted responses to data requests on behalf of Big Rivers Electric Corporation in Case No. 2024-00149 regarding the Fuel Adjustment Clause.

Submitted direct testimony, responses to data requests, and rebuttal testimony on behalf of Big Sandy R.E.C.C. in Case No. 2024-00287 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony and responses to data requests on behalf of Licking Valley R.E.C.C. in Case No. 2024-00211 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony, rebuttal testimony, and responses to data requests on behalf of Jackson Purchase Energy Corporation in Case No. 2024-00085 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Adopted direct testimony on behalf of Kentucky Power Company in Case No. 2023-00159 regarding the zero intercept analysis in a base rate case.

Submitted responses to data requests on behalf of Big Rivers Electric Corporation and Kenergy Corp. in Case No. 2023-00312 regarding a Large Industrial Customer Standby Service Tariff.

Submitted direct testimony on behalf of Big Sandy R.E.C.C. in Case No. 2023-00285 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony, rebuttal testimony, and responses to data requests on behalf of Kenergy Corp. in Case No. 2023-00276 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony, rebuttal testimony, and responses to data requests on behalf of Fleming-Mason Energy Corporation in Case No. 2023-00223 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony and responses to data requests on behalf of Shelby Energy Cooperative in Case No. 2023-00213 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony and responses to data requests on behalf of Farmers RECC in Case No. 2023-00158 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony, rebuttal testimony, and responses to data requests on behalf of Taylor County RECC in Case No. 2023-00147 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted tariff worksheets and responses to data requests on behalf of sixteen distribution cooperative owner-members of East Kentucky Power Cooperative in Case No. 2023-00135 regarding rate design for the pass-through of an approved wholesale earning mechanism bill credit.

Submitted direct testimony and responses to data requests on behalf of Big Rivers Electric Corporation in Case No. 2023-00102 regarding a Qualifying Facilities tariff.

Submitted direct testimony on behalf of Big Rivers Electric Corporation and Kenergy Corp. in Case No. 2023-00045 regarding a marginal cost of service study in support of an economic development rate for a special contract.

Submitted direct and rebuttal testimony and responses to data requests on behalf of Jackson Purchase Energy Corporation in Case No. 2021-00358 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct and rebuttal testimony and responses to data requests on behalf of Big Rivers Electric Corporation in Case No. 2021-00289 regarding a Large Industrial Customer Standby Service Tariff.

Submitted direct testimony on behalf of Big Rivers Electric Corporation and Jackson Purchase Energy Corporation in Case No. 2021-00282 regarding a marginal cost of service study in support of an economic development rate for a special contract.

Submitted direct testimony, responses to data requests, and rebuttal testimony on behalf of sixteen distribution cooperative owner-members of East Kentucky Power Cooperative in Case Nos. 2021-00104 through 2021-00119 regarding rate design for the pass-through of a proposed wholesale rate revision.

Submitted direct testimony and responses to data requests on behalf of Kenergy Corp. in Case No. 2021-00066 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony on behalf of Big Rivers Electric Corporation in Case No. 2021-00061 regarding two cost of service studies in a review of the Member Rate Stability Mechanism Charge for calendar year 2020.

Submitted direct testimony and responses to data requests on behalf of Licking Valley R.E.C.C. in Case No. 2020-00338 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Cumberland Valley Electric in Case No. 2020-00264 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Taylor County R.E.C.C. in Case No. 2020-00278 regarding the cost support and tariff changes for the implementation of a Prepay Metering Program.

Submitted direct testimony and responses to data requests on behalf of Meade County R.E.C.C. in Case No. 2020-00131 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Clark Energy Cooperative in Case No. 2020-00104 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Big Rivers Electric Corporation in Case No. 2019-00435 regarding an Environmental Compliance Plan and Environmental Surcharge rate mechanism.

Submitted direct testimony and responses to data requests on behalf of Jackson Energy Cooperative in Case No. 2019-00066 regarding revenue requirements, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Jackson Purchase Energy Corporation in Case No. 2019-00053 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and data request responses on behalf of Big Rivers Electric Corporation in Case No. 2018-00146 regarding ratemaking issues associated with the anticipated termination of contracts regarding the operation of an electric generating plant owned by the City of Henderson, Kentucky.

Submitted direct testimony on behalf of fifteen distribution cooperative owner-members of East Kentucky Power Cooperative in Case No. 2018-00050 regarding the economic evaluation of and potential cost shift resulting from a proposed member purchased power agreement.

Submitted direct testimony on behalf of Big Sandy R.E.C.C. in Case No. 2017-00374 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony on behalf of Progress Metal Reclamation Company in Kentucky Power Company Case No. 2017-00179 regarding the potential implementation of a Load Retention Rate or revisions to an Economic Development Rate.

Submitted direct testimony on behalf of Kenergy Corp. and Big Rivers Electric Corporation in Case No. 2016-00117 regarding a marginal cost of service study in support of an economic development rate for a special contracts customer.

Submitted rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2014-00134 regarding ratemaking treatment of revenues associated with proposed wholesale market-based-rate purchased power agreements with entities in Nebraska.

Submitted direct and rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2013-00199 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a base rate case.

Submitted direct and rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2012-00535 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a base rate case.

Submitted direct and rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2012-00063 regarding an Environmental Compliance Plan and Environmental Surcharge rate mechanism.

Submitted direct, rebuttal, and rehearing direct testimony on behalf of Big Rivers Electric Corporation in Case No. 2011-00036 regarding revenue requirements and pro forma adjustments in a base rate case.

Submitted direct testimony for Louisville Gas & Electric Company in Case No. 2009-00549 and for Kentucky Utilities Company in Case No. 2009-00548 for adjustment of electric and gas base rates, in support of a new service offering for Low Emission Vehicles, revised special charges, and company offerings aimed at assisting customers.

Submitted discovery responses for Kentucky Utilities and/or Louisville Gas & Electric Company in various customer inquiry matters, including Case Nos. 2009-00421, 2009-00312, and 2009-00364.

Submitted discovery responses for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2008-00148 regarding the 2008 Joint Integrated Resource Plan.

Submitted discovery responses for Louisville Gas & Electric Company and Kentucky Utilities Company in Administrative Case No. 2007-00477 regarding an investigation of the energy and regulatory issues in Kentucky's 2007 Energy Act.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2007-00319 for the review, modification, and continuation of Energy Efficiency Programs and DSM Cost Recovery Mechanisms.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2007-00067 for approval of a proposed Green Energy program and associated tariff riders.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2005-00467 and 2005-00472 regarding a Certificate of Public Convenience and Necessity for the construction of transmission facilities.

Submitted discovery responses for Kentucky Utilities in Case No. 2005-00405 regarding the transfer of a utility hydroelectric power plant to a private developer.

Submitted discovery responses for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2005-00162 for the 2005 Joint Integrated Resource Plan.

Presented company position for Louisville Gas & Electric Company and Kentucky Utilities Company at public meetings held in Case Nos. 2005-00142 and 2005-00154 regarding routes for proposed transmission lines.

Supported Louisville Gas & Electric Company and Kentucky Utilities Company in a Focused Management Audit of Fuel Procurement practices by Liberty Consulting in 2004.

Supported Louisville Gas & Electric Company and Kentucky Utilities Company in an Investigation into their Membership in the Midwest Independent Transmission System Operator, Inc. (“MISO”) in Case No. 2003-00266.

Supported Louisville Gas & Electric Company and Kentucky Utilities Company in a Focused Management Audit of its Earning Sharing Mechanism by Barrington-Wellesley Group in 2002-2003.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2002-00381 regarding a Certificate of Public Convenience and Necessity for the acquisition of four combustion turbines.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2002-00029 regarding a Certificate of Public Convenience and Necessity for the acquisition of two combustion turbines.

Missouri

Submitted direct, rebuttal and surrebuttal testimony for Evergy Metro, Inc. in Case No. ER-2022-0130 regarding a jurisdictional cost allocation analysis in a retail rate case.

Virginia

Submitted direct testimony for Kentucky Utilities Company d/b/a Old Dominion Power in Case No. PUE-2002-00570 regarding a Certificate of Public Convenience and Necessity for the acquisition of four combustion turbines.

EVERGY METRO INC.
JURISDICTIONAL DEMAND ALLOCATOR ANALYSIS

MISSOURI

Date	Res	Sml	Med	Lrg	LrgPwr	Resale	StreetLght	TrafficLght	AreaLght	MORetail
Jul-20	854	121	239	334	248	5.0	-	0.01	-	1,796
Aug-20	843	130	261	387	238	5.0	-	0.01	-	1,860
Sep-20	720	118	246	334	222	5.0	-	0.01	-	1,639
Oct-20	400	91	205	296	213	3.0	-	0.01	-	1,206
Nov-20	417	78	187	315	184	3.0	-	0.01	-	1,180
Dec-20	540	79	159	248	162	2.0	12.1	0.01	2.3	1,202
Jan-21	501	100	222	332	189	4.0	-	0.02	-	1,344
Feb-21	559	103	206	318	167	4.0	-	0.02	-	1,353
Mar-21	431	79	188	304	182	3.0	-	0.02	-	1,184
Apr-21	293	69	159	286	161	3.0	-	0.02	-	968
May-21	506	100	205	300	179	3.0	-	0.02	-	1,290
Jun-21	644	117	225	320	210	4.0	-	0.02	-	1,517

KANSAS

Date	Res	Sml	Med	Lrg	StreetLght	TrafficLght	AreaLght	OffSysLght	KSRetail
Jul-20	1,034	117	183	426	-	0.26	-	-	1,760
Aug-20	935	113	178	408	-	0.26	-	-	1,634
Sep-20	847	110	174	405	-	0.26	-	-	1,535
Oct-20	494	84	138	347	-	0.26	-	-	1,062
Nov-20	433	74	125	351	-	0.25	-	-	982
Dec-20	645	77	114	315	0.1	0.25	0.5	7.8	1,159
Jan-21	554	100	153	390	-	0.26	-	-	1,197
Feb-21	634	96	145	369	-	0.26	-	-	1,246
Mar-21	497	76	122	339	-	0.25	-	-	1,034
Apr-21	341	69	108	313	-	0.25	-	-	832
May-21	683	103	155	384	-	0.25	-	-	1,326
Jun-21	804	118	171	406	-	0.22	-	-	1,500

SYSTEM

Date	Res	Sml	Med	Lrg	LrgPwr	Resale	StreetLght	AreaLght	OffSysLght	TrafficLght	Retail	System
Jul-20	1,888	238	422	760	248	5.0	-	-	-	0.3	3,556	3,561
Aug-20	1,778	243	439	795	238	5.0	-	-	-	0.3	3,494	3,499
Sep-20	1,566	228	420	738	222	5.0	-	-	-	0.3	3,174	3,180
Oct-20	894	175	343	643	213	3.0	-	-	-	0.3	2,268	2,271
Nov-20	850	152	311	665	184	3.0	-	-	-	0.3	2,163	2,166
Dec-20	1,185	156	273	562	162	2.0	12.3	2.80	7.8	0.3	2,361	2,363
Jan-21	1,055	200	375	723	189	4.0	-	-	-	0.3	2,542	2,545
Feb-21	1,193	200	351	687	167	4.0	-	-	-	0.3	2,599	2,602
Mar-21	928	154	310	643	182	3.0	-	-	-	0.3	2,218	2,222
Apr-21	635	137	268	599	161	3.0	-	-	-	0.3	1,800	1,803
May-21	1,189	203	360	684	179	3.0	-	-	-	0.3	2,615	2,618
Jun-21	1,447	235	397	727	210	4.0	-	-	-	0.2	3,016	3,021

EVERGY METRO INC.
JURISDICTIONAL DEMAND ALLOCATOR ANALYSIS

SYSTEM

Date	Coin Retail MO Peak	Coin Retail KS Peak	CoinResale	WNPeak
Jul-20	1,796	1,760	5.0	3,561
Aug-20	1,860	1,634	5.0	3,499
Sep-20	1,639	1,535	5.0	3,180
Oct-20	1,206	1,062	3.0	2,271
Nov-20	1,180	982	3.0	2,166
Dec-20	1,202	1,159	2.0	2,363
Jan-21	1,344	1,197	4.0	2,545
Feb-21	1,353	1,246	4.0	2,602
Mar-21	1,184	1,034	3.0	2,222
Apr-21	968	832	3.0	1,803
May-21	1,290	1,326	3.0	2,618
Jun-21	1,517	1,500	4.0	3,021

DEMAND ALLOCATOR (D1)
Adjusted for Weather & Customer Growth

4CP BASED ON WN July20 - June21 CP

	4CP Loads	D1 Allocator	
MO	1,703.0	**51.3710%**	**4CP**
KS	1,607.3	**48.4842%**	
WHSL	4.8	**0.1448%**	
TOTAL	3,315.1	100.0000%	

DEMAND ALLOCATOR (D1)
Adjusted for Weather & Customer Growth

12CP BASED ON WN July20 - June21 CP

	12CP Loads	D1 Allocator	
MO	1,378.3	**51.9271%**	**12CP**
KS	1,272.3	**47.9335%**	
WHSL	3.7	**0.1394%**	
TOTAL	2,654.3	100.0000%	

AVG of the Factors 4CP & 12CP

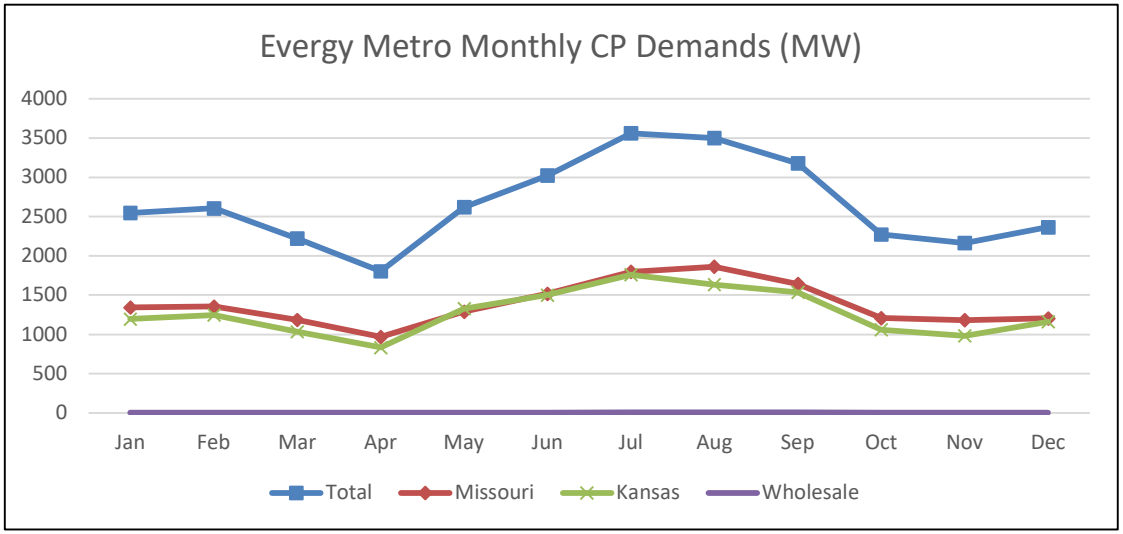
	D1 Allocator
MO	**51.6490%**
KS	**48.2089%**
WHSL	**0.1421%**
TOTAL	100.0000%

Notes
Metro Weather Normalized Coincident Peaks Jul 2020 - Jun 2021
Includes Losses
Includes Customer Growth - projected to May 2022 & Energy Efficiency Impacts
All Data in MW
Retail Does Not Include Resale

Evergy Metro
Juridictional Demand Allocation

#	Item		Total	Missouri	Kansas	Wholesale
1	Monthly CP Demands MW					
2						
3	1	Jan-21	2,545	1,344	1,197	4
4	2	Feb-21	2,603	1,353	1,246	4
5	3	Mar-21	2,221	1,184	1,034	3
6	4	Apr-21	1,803	968	832	3
7	5	May-21	2,619	1,290	1,326	3
8	6	Jun-21	3,021	1,517	1,500	4
9	7	Jul-20	3,561	1,796	1,760	5
10	8	Aug-20	3,499	1,860	1,634	5
11	9	Sep-20	3,179	1,639	1,535	5
12	10	Oct-20	2,271	1,206	1,062	3
13	11	Nov-20	2,165	1,180	982	3
14	12	Dec-20	2,363	1,202	1,159	2
15						
16		Average	2,654	1,378	1,272	4
17		Minimum	1,803	968	832	2
18		Maximum	3,561	1,860	1,760	5
19						
20	Average Monthly CP Demands					
21						
22	1CP	July	3,561	1,796	1,760	5
23		Other Months	2,572	1,340	1,228	4
24						
25	3CP (JJA)	Jun-Aug	3,360	1,724	1,631	5
26		Other Months	2,419	1,263	1,153	3
27						
28	3CP (JAS)	Jul-Sep	3,413	1,765	1,643	5
29		Other Months	2,401	1,249	1,149	3
30						
31	4CP	Jun-Sep	3,315	1,703	1,607	5
32		Other Months	2,324	1,216	1,105	3
33						
34	6CP	Jun-Sep,Jan-Feb	3,068	1,585	1,479	5
35		Other Months	2,240	1,172	1,066	3
36						

#	Item		Total	Missouri	Kansas	Wholesale
37	8CP	Dec-Feb, May-Sep	2,924	1,500	1,420	4
38		Other Months	2,115	1,135	978	3
39						
40	10CP	All but Nov, Apr	2,788	1,439	1,345	4
41		Other Months	1,984	1,074	907	3
42						
43	12CP	All	2,654	1,378	1,272	4
44						
45	Test 1:	On and Off Peak Test		19% or Lower: 12 CP		
46						
47		1CP	37%	33%	42%	40%
48		3CP (JJA)	35%	33%	38%	36%
49		3CP (JAS)	38%	37%	39%	48%
50		4CP	37%	35%	39%	44%
51		6CP	31%	30%	32%	45%
52		8CP	30%	27%	35%	27%
53		10CP	30%	26%	34%	22%
54						
55	Test 2:	Low-to-Annual Peak Test		66% or Higher: 12 CP		
56						
57		All Months	51%	52%	47%	40%
58						
59	Test 3:	Average-to-Annual Peak Test		81% or Higher: 12 CP		
60						
61		All Months	75%	74%	72%	73%
62						
63	Jurisdictional CP Ratios					
64						
65		1CP	100.00%	50.44%	49.42%	0.14%
66		3CP (JJA)	100.00%	51.31%	48.55%	0.14%
67		3CP (JAS)	100.00%	51.71%	48.14%	0.15%
68		4CP	100.00%	51.37%	48.48%	0.14%
69		6CP	100.00%	51.66%	48.20%	0.15%
70		8CP	100.00%	51.31%	48.55%	0.14%
71		10CP	100.00%	51.61%	48.25%	0.14%
72		12CP	100.00%	51.93%	47.93%	0.14%
73		**Avg of 4CP and 12CP**	**100.00%**	**51.65%**	**48.21%**	**0.14%**


Evergy Metro Monthly CP Demands (MW)
4000
3500
3000
2500
2000
1500
1000
500
0
Jan
Feb
Mar
Apr
May
Jun
Jul
Aug
Sep
Oct
Nov
Dec
Total
Missouri
Kansas
Wholesale