

Exhibit No.:
Issue: Fuel Adjustment Clause
Witness: Linda J. Nunn
Type of Exhibit: Direct Testimony
Sponsoring Party: Evergy Missouri West
Case No.: ER-2026-0375
Date Testimony Prepared: June 30, 2026

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2026-0375

DIRECT TESTIMONY

OF

LINDA J. NUNN

ON BEHALF OF

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

**Kansas City, Missouri
June 2026**

DIRECT TESTIMONY

OF

LINDA J. NUNN

Case No. ER-2026-0375

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

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

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

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

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

12 A: I am testifying on behalf of EMW (“Company”).

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

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

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

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

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

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

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

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

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

22 A: The purpose of my testimony is to support the Fuel Adjustment Clause (“FAC”) that
23 has been filed by EMW. This FAC tariff filing consists of a Fuel Adjustment Rate

1 (“FAR”) calculated using actual fuel and purchased power costs, net of off-system
2 sales revenues incurred by the Company. My testimony supports the rate schedule
3 filed to adjust rates for the FAC includable costs experienced during the six-month
4 period of December 2025 through May 2026. This six-month period represents the
5 38th accumulation period under EMW’s FAC, which was originally approved by the
6 Commission in Case No. ER-2007-0004 (“2007 Case”) and modified in Case Nos.
7 ER-2009-0090, ER-2010-0356, ER-2012-0175, ER-2016-0156, ER-2018-0146, ER-
8 2022-0130 and ER-2024-0189. The proposed FAC charge for residential customers
9 is \$0.00876 per kWh. Based on usage of 1,000 kWh per month, the customer
10 will see a monthly charge of \$8.76. This represents an increase of \$4.24 to an
11 EMW residential customer’s monthly bill compared to the current monthly FAC
12 charge of \$4.52.

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

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

1 For the 38th accumulation period covering the period of December 2025
2 through May 2026, EMW's actual FAC includable costs were higher than the base
3 energy costs included in base rates by approximately \$50.4 million. In accordance
4 with the Commission's rule and the Company's approved FAC, EMW has calculated
5 the FAC tariff that provides for a change in rates to collect from customers 95% of
6 those cost changes, or approximately \$47.9 million, plus interest. These amounts are
7 before true-up or any other adjustments.

8 In addition, a true-up filing is being made concurrent with this filing covering
9 the 35th accumulation period of June 2024 through November 2024 and its
10 corresponding recovery period of March 2025 through February 2026. The proposed
11 true-up amount results in a balance of \$818,894 remaining to be returned to
12 customers.

13 In summary, these amounts combined, including interest amounting to \$1.6
14 million result in a proposed 38th accumulation period FPA of \$48.7 million to be
15 collected from customers. The tariff being submitted with this filing reflects rates
16 effective September 1, 2026.

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

18 A: EMW's Actual Net Energy Costs ("ANEC"), are over the base energy costs included
19 in base rates by approximately \$50.4 million. When compared to the prior 37th
20 accumulation period, the ANEC are \$10.7 million higher in the 38th accumulation.
21 This increase reflects \$12.4 million or 30% higher fuel costs, partially offset by \$1.3
22 million or 17% higher off-system sales revenue. While the winter months of
23 December through May in the 38th accumulation period typically result in lower load

1 requirements and corresponding lower ANEC than the summer months of June
2 through November in the 37th accumulation period, a couple of factors contributed
3 to the increase. Fuel and purchased power costs increased in January due to Winter
4 Storm Fern, as natural gas prices surged during January 23-26, when extreme cold
5 drove higher demand while freezing conditions curtailed natural gas production.
6 Additionally, March 2026 includes purchased power accruals of \$6.5 million related
7 to EMW interconnection updates and \$4.2 million associated with Southwest Power
8 Pool (“SPP”) disputes. SPP began resettlements of these amounts in May 2026.

9 **Q: Please describe the Company’s process of tracking the impact on ANEC related**
10 **to customers serviced under the Special Incremental Load tariff, Schedule SIL.**

11 A: As noted in Staff’s Recommendation on January 29, 2024, in Case No. ER-2024-
12 0205: “the Company and Staff agreed to settle the Nucor methodology that Staff
13 raised concerns with. This Second Agreement resulted in a calculation that will begin
14 with hour 1 for any event where Nucor load experiences a 25% deviation from the
15 expected Nucor load for more than 4 hours, and the event tracking of qualified events
16 will include the net of both positive and negative impacts for all identified qualified
17 events in each month. Additionally, one general ledger entry will be made in the last
18 month of each 6-month Accumulation Period, and this entry will only be made if the
19 net result of the event tracking is an increase to non-Nucor customers during the 6-
20 month Accumulation period, to decrease the FAR’s ANEC and reduce costs to non-
21 Nucor customers. Then after the conclusion of an Accumulation Period, the amount
22 for the event tracking will be reset to zero.”

1 **Q: What was the impact or result of the event tracking procedure as it relates to**
2 **this 38th accumulation period?**

3 A: The Company has performed the calculations of the load balancing event tracking for
4 the months of November 2025 through April 2026 for this 38th accumulation period
5 of December 2025 through May 2026. The event tracking results in an increase to
6 non-Nucor customers of \$116,573 therefore, an entry to reduce the ANEC by this
7 amount is included in May 2026 in this filing.

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

10 A: The proposed tariff rates are shown in Schedule LJM-1. The filing made in
11 conjunction with this testimony contains all the information as set in 20 CSR 4240-
12 20.090(8)(2)(A) which supports these proposed rates. In addition, I am submitting a
13 copy of the workpapers that support the determination of the current FAR.

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

16 A: The proposed current period FARs for EMW customers by voltage level is shown
17 below:

Proposed Current Period FARs	
Voltage	AP 38
Secondary	\$0.00524
Primary	\$0.00511
Substation	\$0.00506
Transmission	\$0.00502

18

19 This is the difference between base FAC includable costs and the actual costs incurred
20 by the Company including interest and any adjustments during the 38th accumulation

1 period of December 2025 through May 2026 and will be included in billed FAC rates
2 over the 12-month recovery period running from September 2026 through August
3 2027.

4 The proposed FAR was calculated in the manner specified in the Company's
5 FAC tariff. Attached to my testimony, as Schedule LJM-1, is a copy of the tariff sheet
6 with the current FAR, the prior period FAR and the total FAR that will be billed to
7 customers over the recovery period. The FAR calculated for the 36th accumulation
8 period has been removed as its recovery period will cease in August 2026. The FAR
9 for the 37th accumulation period is added to the FAR for the current 38th
10 accumulation period to provide the annual FAR. Thus, given the proposed current
11 FAR calculations, the annual FAR's for EMW customers are shown in the table
12 below:

	ER-2026-0159		
	38th AP	37th AP	
Voltage	Proposed 3rd Revised Sheet No. 124.10	Current 2nd Revised Sheet No. 124.10	Impact
Secondary	\$0.00876	\$0.00452	\$0.00424
Primary	\$0.00854	\$0.00441	\$0.00413
Substation	\$0.00846	\$0.00437	\$0.00409
Transmission	\$0.00839	\$0.00433	\$0.00406

13
14 These proposed rates will be billed to customers for six months, from September 2026
15 through February 2027. As stated earlier, based on usage of 1,000 kWh per month,
16 this will result in a monthly FAC charge of \$8.76, an increase of \$4.24 to an EMW
17 residential customer's monthly bill compared to the current monthly FAC charge of
18 \$4.52.

1 **Q: If the rate schedules filed by EMW are approved or allowed to go into effect,**
2 **what safeguards exist to ensure that the revenues the Company bills to its**
3 **customers do not exceed the fuel and purchased power costs that EMW actually**
4 **incurred during the Accumulation Period?**

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

16 **Q: Have each of these mechanisms been in effect throughout the FAC process since**
17 **its inception in the 2007 Case?**

18 A: Yes, EMW is currently in its thirteenth prudence review, Case No. EO-2026-0212,
19 for the review period of June 2024 through November 2025. In the previous twelfth
20 prudence review, Case No. EO-2025-0074, for the review period of December 2022
21 through May 2024, MPSC Staff found no evidence of imprudence.

22 In the previous eleventh prudence review, Case No. EO-2023-0277, for the
23 review period of June 2021 through November 2022. Parties resolved certain issues

1 pertaining to purchased power and subsequent FAC reporting through a Non-
2 Unanimous Stipulation and Agreement which the Commission approved on May 12,
3 2024. As part of that settlement, the Company included in the prior 35th FAR filing,
4 Case No. ER-2024-0382, an adjustment for Southwest Power Pool (“SPP”)
5 administrative fees of \$2,076 that were previously included in the FAC for recovery.

6 On September 14, 2022, in the Company’s tenth prudence review, Case No.
7 EO-2022-0065, the Commission approved the Non-Unanimous Stipulation and
8 Agreement filed on July 25, 2022, where the Company agreed, with no admission of
9 imprudence, to a one-time FAC adjustment for 2017 vintage expired RECs. The
10 Company refunded \$48,796 plus interest of \$1,968 in the 31st accumulation period
11 filing, Case No. ER-2023-0210.

12 On May 4, 2022, in the Company’s ninth prudence review, Case No. EO-
13 2020-0262, the Commission issued its Report and Order finding Evergy was
14 imprudent by not utilizing the demand response programs to reduce energy costs for
15 its customers during the review period of June 2018 through November 2019.
16 Therefore, the Company refunded the amount of \$160,892 plus interest of \$10,613 in
17 the 30th accumulation period filing, Case No. ER-2023-0011. Also in the ninth
18 prudence review, on January 20, 2021, an Ordered Adjustment for Sibley retirement
19 cost was stipulated by parties amounting to \$1,039,646, or \$984,898 Missouri
20 jurisdictional with 95% sharing applied. Based on the agreement by parties, rather
21 than recovering this amount through the FAC, the Company recorded the \$1,039,646
22 in retirement costs to the Sibley AAO account for consideration in the 2022 general

1 rate case, Case No. ER-2022-0130, and refunded the amount of \$984,898 plus interest
2 of \$53,550 in the 28th accumulation period FAR filing, Case No. ER-2022-0005.

3 In all previous prudence reviews, the MPSC Staff indicated in each of their
4 reports that there were no areas of imprudence identified within the audits with the
5 exception of Staff's recommendation in the Company's third prudence review which
6 was taken before the Commission. However, following the Commission's review,
7 the Commission issued its order stating no indication of imprudence by the Company.

8 In addition, the Company has made 34 true-up filings, all of which were
9 approved by the MPSC. The 35th true-up filing, covering the accumulation period of
10 June 2024 through November 2024 and its corresponding recovery period of March
11 2025 through February 2026, is being made concurrent with this filing. The
12 Company's calculation of the proposed true-up has been included in the calculation
13 of the current proposed tariff change.

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

16 A: The Company requests the Commission approve the rate schedule to be effective as
17 of September 1, 2026.

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

19 A: Yes, it does.

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

P.S.C. MO. No. 1 3rd

Revised Sheet No. 124.10

Canceling P.S.C. MO. No. 1 2nd

Revised Sheet No. 124.10

For Missouri Retail Service Area

FUEL ADJUSTMENT CLAUSE – Rider FAC
 FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE
 (Applicable to Service Provided January 1, 2025 and Thereafter)
 Effective for the Billing Months of September 2026 through February 2027

Accumulation Period Ending: May 2026		
1	Actual Net Energy Cost (ANEC) = (FC+E+PP+TC-OSSR-R)	\$151,860,050
2	Net Base Energy Cost (B)	- \$101,376,849
	2.1 Base Factor (BF) *	0.02309
	2.2 Accumulation Period NSI (S _{AP})	4,390,508,844
3	(ANEC-B)	\$50,483,201
4	Jurisdictional Factor (J)	x 99.81136%
5	(ANEC-B)*J	\$50,387,969
6	Customer Responsibility	x 95%
7	95% *((ANEC-B)*J)	\$47,868,571
8	True-Up Amount (T)	+ (\$818,894)
9	Interest (I)	+ \$1,650,956
10	Prudence Adjustment Amount (P)	+ \$0
11	Fuel and Purchased Power Adjustment (FPA)	= \$48,700,633
	11.1 PISA Deferral (Sec. 393.1400)	\$0
	11.2 FPA Subject to Recover in True-Up	\$48,700,633
12	Estimated Recovery Period Retail NSI (S _{RP})	÷ 10,005,631,851
13	Current Period Fuel Adjustment Rate (FAR)	= \$0.00487
14	Current Period FAR _{Sec} = FAR x VAF _{Sec}	\$0.00524
15	Prior Period FAR _{Sec}	+ \$0.00352
16	Current Annual FAR _{Sec}	= \$0.00876
17	Current Period FAR _{Prim} = FAR x VAF _{Prim}	\$0.00511
18	Prior Period FAR _{Prim}	+ \$0.00343
19	Current Annual FAR _{Prim}	= \$0.00854
20	Current Period FAR _{Sub} = FAR x VAF _{Sub}	\$0.00506
21	Prior Period FAR _{Sub}	+ \$0.00340
22	Current Annual FAR _{Sub}	= \$0.00846
23	Current Period FAR _{Trans} = FAR x VAF _{Trans}	\$0.00502
24	Prior Period FAR _{Trans}	+ \$0.00337
25	Current Annual FAR _{Trans}	= \$0.00839
26	VAF _{Sec} = 1.0766	
27	VAF _{Prim} = 1.0503	
28	VAF _{Sub} = 1.0388	
29	VAF _{Trans} = 1.0300	

Credits are shown in parentheses, e.g. (\$0.05).

Issued: June 30, 2026
 Issued by: Darrin R. Ives, Vice President

Effective: September 1, 2026
 1200 Main, Kansas City, MO 64105
 Schedule LJN-1