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Issue: Natural Gas Fuel Supply Plan Gains and Losses; Fuel Inventories; Load Forecasting and Reporting
Witness: JP Meitner
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Evergy Missouri Metro
Case No.: ER-2026-0143
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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2026-0143

REBUTTAL TESTIMONY

OF

JP MEITNER

ON BEHALF OF

EVERGY MISSOURI METRO

Kansas City, Missouri
August 2026

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REBUTTAL TESTIMONY

OF

JP MEITNER

Case No. ER-2026-0143

I. INTRODUCTION

Q: Please state your name and business address.

A: My name is JP Meitner. My business address is 818 South Kansas Avenue, Topeka, Kansas 66612.

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

A: I am employed by Evergy Kansas Central, Inc. and serve as the Director of Market Operations for Evergy Metro, Inc. ("Evergy Metro") d/b/a Evergy Missouri Metro ("Evergy Missouri Metro," "EMM," "Applicant," or the "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 Kansas South, Inc., collectively d/b/a as Evergy Kansas Central ("Evergy Kansas Central" or "EKC"), the operating utilities of Evergy, Inc. ("Evergy").

Q: On whose behalf are you testifying?

A: I am testifying on behalf of Evergy Missouri Metro. 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 responsibilities include the oversight of market operations for the Evergy jurisdictions. This includes generation system operations, real time trading, day ahead planning, fuel purchasing (natural gas, coal, and fuel oil), and analytics.

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

A: I graduated from Washburn University in 2004 with a BBA in Finance and Economics. I graduated from Baker University in 2009 with a Masters in Business Administration. I began my utility career with Westar Energy, Inc. in 2004. In addition to my existing responsibilities, I have held several positions at Westar Energy, Inc. and Evergy, Inc., in power marketing including Trading, TCR Manager, and Manager of Real-Time Operations.

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

A: Yes. I have offered testimony before the MPSC and the Kansas Corporation Commission ("KCC").

Q: What is the purpose of your rebuttal testimony?

A: I am adopting the direct testimony of Jessica Tucker which was filed in this case on February 6, 2026. Ms. Tucker left Evergy earlier this year. The purpose of my rebuttal testimony is to respond to the direct testimony of Staff of the Commission ("Staff") witnesses Nieto, Eubanks, Lange, and Mastrogiannis regarding several topics, including natural gas fuel supply plan gains and losses treatment, coal inventory assumptions, and large load modeling and reporting requirements.

Q: Are there any updates to Tucker's direct testimony?

A: No.

II. NATURAL GAS FUEL SUPPLY PLAN GAINS AND LOSSES IN THE FAC

Q: Do you agree with the approach suggested by Staff witness Nieto for what she refers to as "Hedging gains and losses"?

A: No. Nieto recommends that the Company's "hedging" activities be deferred into the Company's regulatory asset/liability account for future rate treatment determination as outlined in the Stipulation and Agreement from Case No. ER-2022-0129, amortized over a four-year period, with no inclusion in rate base.[1] I do not agree that this treatment appropriately reflects the purpose and mechanics of the Company's forward procurement activities. By deferring the impact of the forward procurement activity for future rate treatment determination, it creates a mismatch of timing between when the FAC costs are realized and the forward purchase activity gains and losses that reduced the volatility of those same FAC costs are realized. This is the time, during a rate case, to correct the approach for the costs and gains associated with this activity to flow through the FAC. This activity can diversify the pricing of the natural gas that will need to be ultimately purchased anyway. In the settlement of the Evergy Missouri West rate case in 2024, it was determined that forward natural gas purchases that would help lower the volatility of fuel costs for the Evergy Missouri West customers would flow through the fuel adjustment clause. Other forward fuel procurement activities for Evergy Missouri Metro already flow through the FAC. It is only appropriate that the same treatment be given to the Evergy Missouri Metro forward natural gas purchases. As Ms. Tucker explained in her direct testimony, the gains

[1] See A. Nieto Direct at 5-6.

and losses associated with the Company's natural gas and power fuel supply plans are most appropriately recovered through the fuel adjustment clause ("FAC").[2] The Company recommended that forward physical gas, financial gas, physical power, financial power, and option products be approved for inclusion in the FAC so that the costs and benefits of these fuel cost risk-mitigation activities flow through to the customers directly benefitting from the activity.[3] These activities are designed to lessen the impact on customers from severe, unexpected market fluctuations, and the associated net gains and costs are properly included in the cost of fuel and purchased power recovered through the FAC.[4] Staff's recommendation to exclude these gains and losses from FAC recovery is inconsistent with the Commission's regulatory framework regarding the FAC as such amounts are an integral part of the cost of fuel and purchased power. In addition, Evergy will be holding a meeting with Staff and OPC on August 24, 2026 to further discuss this forward procurement activity.

Q: Do forward natural gas gains and losses flow through the other Evergy jurisdictions respective fuel clauses?

A: Yes, the other three jurisdictions (Evergy Metro Kansas, Evergy Missouri West, and Evergy Kansas Central are all approved for forward natural gas transactions to flow through their respective fuel clauses.

[2] See J. Tucker Direct at 27-28.
[3] See J. Tucker Direct at 27-29.
[4] See J. Tucker Direct at 29.

III. FUEL INVENTORY

Q: Do you agree with the assumptions made by Staff in their fuel burn model?

A: No. Staff's modeled fuel burn assumptions of Iatan and La Cygne Generating Stations reflect significantly lower values than the actual historical annual fuel burns. As shown in CONFIDENTIAL Table JPM-1, Staff's modeled assumptions fall nearly 4.0 million tons short of the actual tonnage burned. Specifically, 1.77 million tons short at Iatan Station and 2.18 million tons short for La Cygne Station. This low burn projection has a cascading effect throughout Staff's value assumptions causing erroneous figures in tons of inventory, total inventory balance, and final calculated inventory values, all inadequate to operate the generating stations, as well as MWh produced, which is further elaborated on in Evergy witness Ms. Foo's rebuttal testimony on page 10. Additionally, Staff is basing their projections on inaccurate Target Days of Available Coal Inventory at each station which further exacerbates the inaccuracy of their costing evaluation. Supplementary evaluation of average annualized fuel burn from 2020 through 2025 reflected an approximate average of 3.37 million tons burned at Iatan Station and 3.88 million tons burned at La Cygne Station. In stark contrast, Staff modeled annual fuel burns of 1.60 million tons for Iatan Station and 1.70 million tons of La Cygne Station. When compared against established historical burn rates, Staff's modeled burn assumptions are not representative of expected fuel consumption and result in materially inaccurate inventory requirements and inventory values. The Commission should not accept Staff's inventory requirements and values as a result of the distortion created by their artificially low modeled burn rates. The Company strongly recommends utilizing its inventory requirements and values in establishing the revenue requirements in this case.

** **CONFIDENTIAL** Table JPM-1: 6-Year Historical Coal Burns Compared to Staff's Burn Values

[redacted]

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IV. LOAD FORECASTING AND REPORTING IN THE SPP MARKET

Q: Can you explain, at a high level, how the SPP Integrated Marketplace works?

A: The SPP Integrated Marketplace uses centralized optimization to decide both which generation resources should be operating and how much each should produce to serve the footprint wide demand. In the Day-Ahead Market, a security-constrained unit commitment model evaluates generator offers—including startup, no-load, energy, and reserve costs—against expected load and operating-reserve needs, selecting the least-cost combination that can operate reliably while respecting transmission limits and resource constraints such as minimum output, ramp rates, startup times, and minimum run times. Reliability Unit Commitment processes then revise that plan as load forecasts and system conditions change. In real time, a security-constrained economic dispatch model adjusts committed resources—generally every five minutes—and co-optimizes energy and operating reserves to continuously balance supply and demand at the lowest offered production cost feasible, accounting for congestion, transmission losses, and reliability requirements. The result is not simply dispatching generators from cheapest to most expensive but finding the lowest-cost system-wide solution that can physically deliver electricity where and when it is needed.

Q: Can you explain how loads, both forecasted and metered, are submitted to and settled with SPP?

A: Evergy submits day ahead demand bids to SPP in hourly granularity for the aggregation of each load. After an operating day is completed, Evergy submits the metered real time load to SPP at an hourly precision for settlements.

Q: Why is it important to understand how loads are submitted to and settled with SPP in this case?

A: This is important to understand in this case because it provides the level of granularity needed by the SPP market to serve loads reliably and at the lowest cost for the market as a whole. In this case, SPP requires hourly load information from load serving entities to administer the market. Furthermore, any modeling conducted by Evergy uses hourly load assumptions. To require loads at a level of precision beyond that is both unnecessary and burdensome.

Q: Do you agree with Staff's position that 15-minute demand intervals are necessary to be able to annualize class loads, perform production cost modeling, and calculate jurisdictional allocation factors?

A: No, I do not.[5] Evergy has consistently produced model runs that do not require 15-minute demand intervals. Hourly loads are utilized in Evergy modeling and is consistent with the granularity that the SPP market requires. Anything requested beyond hourly granularity is not necessary and becomes infeasible very quickly.

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[5] See C. Eubanks Direct at 19.

Q: Do you agree that there are limitations on incorporation of Customer A in the true-up calculation as of June 30, 2026 or that Staff's attempt to calculate a true-up plug for Customer A was appropriate based on how SPP works?

A: As witness Ives points out on page 3 of his rebuttal testimony, it is extremely difficult and infeasible to isolate and attribute wholesale market outcomes to a single customer. Customer A is served as part of the Company's integrated system, and its load is incorporated into the Company's overall resource commitments, market positions, and participation in the SPP Integrated Marketplace. The addition of Customer A's load affects the Company's aggregate load obligation and influences generation dispatch, market purchases and sales, reserve requirements, and settlement outcomes across the portfolio. These market results are produced through SPP's centralized optimization processes, which are designed to identify the lowest-cost and most reliable solution for the system as a whole rather than assigning specific market outcomes to individual customers.

As a result, attempting to isolate Customer A's impact through a customer-specific true-up adjustment necessarily requires assumptions and allocation methodologies that do not reflect how costs and benefits are actually created or realized within the SPP market. Such an approach risks creating a mismatch between market outcomes and the manner in which those outcomes are assigned to customers.

Moreover, Staff's proposal is inconsistent with the integrated Large Load Power Service ("LLPS") framework recently approved by the Commission. As discussed further by Company witness Gunn, the Commission approved a comprehensive LLPS rate design that relies not only on the LLPS tariff itself, but also on the availability of LLPS-specific optional tariffs and the applicability of generally applicable riders to LLPS customers. The approved framework reflects a holistic approach to serving large-load customers within the Company's integrated system. Staff's proposal seeks to isolate and modify a single component of that framework without appropriately considering the interaction among the various elements of the Commission-approved LLPS structure. Accordingly, neither Staff's proposed true-up adjustments nor its broader proposals to separately identify and assign market impacts to LLPS customers are consistent with the design of the SPP marketplace or the Commission's recently approved LLPS regulatory framework.

Q: Staff suggests that there are two alternative options to handling Customer A and Customer B? Do you agree with their recommendations?

A: No, I do not.[6] Option 2 is simply an inappropriate application to modify the FAC to remove Large Load Power Service ("LLPS") customers from the FAC. Staff's proposed methodology in Option 2 to allocate system-level SPP charges to LLPS based on their share of monthly Missouri jurisdictional kWh is not a valid determination of the SPP costs to LLPS customers. SPP settlement charges result from the Company's integrated participation in the wholesale market and are not in direct proportion to an individual customer's share of Missouri jurisdictional energy. This is only an attempt to relitigate the LLPS structure that has already been approved. Option 1 appears to be a true-up issue and as of the writing of this testimony, the Company is unaware of how Staff will handle this issue in their true-up calculation and will address Staff's approach in EMM's true-up rebuttal.

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[6] Id. at 42, 47-49.

V. CONCLUSION

Q: Please summarize your testimony.

A: I address three key issues raised by Staff. First, I explain why Staff's recommendation to remove natural gas fuel supply plan gains and losses from FAC recovery and instead defer them into a regulatory liability account is inconsistent with both the Commission's regulatory framework and other Evergy jurisdiction treatment, as these amounts are an integral part of the cost of fuel and purchased power. Second, I demonstrate that Staff's fuel burn assumptions for Iatan and La Cygne Generating Stations are materially inaccurate and should not be utilized by the Commission. And finally, I address Staff's positions on load forecasting and Large Load Power Service customer reporting, explaining that hourly load precision is sufficient and consistent with SPP market requirements and that attempts to isolate large load impacts in the FAC will not produce accurate results. That isolation is not consistent with the SPP Integrated Marketplace or the Commission-approved LLPS framework. SPP optimizes resources and load on a portfolio-wide basis, meaning dispatch decisions, market settlements, and other wholesale market outcomes are produced for the system as a whole, not for individual customers. Attempts to isolate FAC impacts for a specific customer therefore rely on allocations and assumptions rather than actual market results, creating a mismatch between how those outcomes are produced and assigned. In addition, Staff's proposal would modify a single component of the Commission-approved LLPS framework without considering the broader integrated structure under which LLPS customers take service. Accordingly, Staff's proposal is inconsistent with both the design of the SPP marketplace and the approved LLPS construct.

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 JP MEITNER

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

JP Meitner, being first duly sworn on his oath, states:

1. My name is JP Meitner. I work in Topeka, Kansas, and I am employed by Evergy Kansas Central, Inc. as Director of Market Operations.

2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of Evergy Missouri Metro consisting of eleven (11) 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.

James P Meitner
JP Meitner

Subscribed and sworn before me this 11th day of August 2026.

Anthony R Westenkirchner
Notary Public

My commission expires: April 26, 2029

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

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

Docket No.: ER-2026-0143
Date: August 11, 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**
Meitner Rebuttal, p. 6, lns. 1-3	3, 4, and 6

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

1. Customer-specific information;

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3. Marketing analysis or other market-specific information relating to services offered in competition with others;

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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;

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