BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

CROSS-ANSWERING TESTIMONY OF JARED R. ROBERTSON ON BEHALF OF THE KROGER CO.

IN THE MATTER OF THE APPLICATION OF EVERGY KANSAS CENTRAL, INC. AND EVERGY KANSAS SOUTH, INC. FOR APPROVAL TO MAKE CERTAIN CHANGES IN THEIR CHARGES FOR ELECTRIC SERVICE PURSUANT TO K.S.A. 66-117.

DOCKET NO. 25-EKCE-294-RTS

JUNE 20, 2025

1		<u>Introduction</u>
2	Q.	Please state your name and business address.
3	A.	My name is Jared R. Robertson. My business address is 111 East Broadway,
4		Suite 1200, Salt Lake City, Utah, 84111.
5	Q.	Are you the same Jared Robertson who provided direct testimony on June 6,
6		2025, in this case?
7	A.	Yes, I am.
8		Overview and Conclusions
9	Q.	What is the purpose of your cross-answering testimony in this proceeding?
10	A.	My testimony responds to Kavita Maini, who filed direct testimony on
11		behalf of Walmart Inc. and CCPS Transportation, LLC.
12	Q.	What recommendations do you present in your cross-answering testimony?
13	A.	I disagree with Witness Maini's conclusion that the MGS rates proposed by
14		EKC are a reasonable reflection of the COSS results.1 The rate design Witness
15		Maini supports is not a reasonable reflection of the system costs incurred by the
16		MGS customers. I recommend the Commission reject Witness Maini's proposal to
17		use the rate design for MGS presented by EKC, and that EKC should design rates
18		that move towards alignment with costs rather than maintaining the current
19		misalignment.

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¹ Direct Testimony Kavita Maini, pg. 18.

1		MGS Rate Design		
2	Q.	How does the Company propose to increase the various components of the		
3		MGS rate design?		
4	A.	Ms. Maini explains that the Company proposes increasing all components		
5		using the same percentage increase. ²		
6	Q.	Does Ms. Maini support the Company's proposed MGS rate design?		
7	A.	Yes. Ms. Maini states that she supports the equal percentage increase to		
8		each of the charges because she claims that the proportional shares of the customer,		
9		demand, and energy charges are a reasonable reflection of the COSS. ³		
10	Q.	Does Ms. Maini provide a comparison of the proportional shares of the		
11		customer, demand, and energy revenues relative to the underlying cost		
12		components?		
13	A.	Yes, she does. Table JRR-1 below summarizes the proportional shares of		
14		the customer, demand, and energy revenues relative to the underlying cost		
15		components provided in Ms. Maini's testimony. ⁴ The results are consistent with		
16		my comparison of revenues and costs by classification as presented in my direct		
17		testimony. ⁵		

² *Id*.
³ *Id*.
⁴ *Id*.
⁵ Direct Testimony of Jared R. Robertson, p. 6, Table JRR-2.

Table JRR-1R Proportional Share of the Customer, Demand, And Energy Revenues Relative to Cost

Cost of Service % EKC Proposed % of

Classification	of Total	Total
Customer	0.7%	1.4%
Demand	82.2%	77.7%
Energy	17.2%	20.9%
Total	100.0%	100.0%

5 Q. Is the rate design that Witness Maini supports a close representation of the cost of service for the MGS customers?

7 A. No. As can be seen in Table JRR-1R above, the rate design deviates from the COSS for each classification of revenue.

Q. What is your assessment of the MGS rate design?

As I explain in my direct testimony, and as is demonstrated in Table JRR-1R above, the proposed MGS rate design is not aligned with the underlying cost components. For the reasons I explain in my direct testimony, I recommend modifications to the MGS rate design that will improve the alignment between rates and the underlying cost while at the same time employing gradualism.

Q. Does this conclude your cross-answering testimony?

16 A. Yes, it does.

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IN THE MATTER OF THE APPLICATION OF EVERGY KANSAS CENTRAL, INC. AND EVERGY KANSAS SOUTH, INC. FOR APPROVAL TO MAKE CERTAIN CHANGES IN THEIR CHARGES FOR ELECTRIC SERVICE PURSUANT TO K.S.A. 66-117.) Case No. 25-EKCE-294-RTS
COMMONWEALTH OF VIRGINIA)	
CHESTERFIELD COUNTY)

Jared Robertson, being first duly sworn, deposes and states that:

- 1. He is a Senior Analyst with Energy Strategies. L.L.C., in Salt Lake City, Utah;
- He is the witness who sponsors the accompanying testimony entitled "Cross Answering Testimony of Jared Robertson;"
- 3. Said testimony was prepared by him and under his direction and supervision;
- If inquiries were made as to the facts and schedules in said testimony he would respond as therein set forth; and
- The aforesaid testimony and schedules are true and correct to the best of his knowledge, information and belief.

Sared Robertson

Subscribed and sworn to or affirmed before me this 18th day of June, 2025, by Jared Robertson.

Notary Public

NINSEY MICHAEL HEWITT
NOTARY PUBLIC
PREG. #7523595
COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES OCTOBER 31, 2025

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 20th day of June, 2025, to the following:

/s/ Kurt J. Boehm Kurt J. Boehm, Esq.

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