

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

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**DIRECT TESTIMONY**

**OF**

**ELIZABETH A. HERRINGTON**

**EVERGY KANSAS CENTRAL**

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**DOCKET NO. 23-EKCE-XXX-ACA**

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1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 **A.** Elizabeth A. Herrington, 1200 Main, Kansas City, Missouri 64105-2122.

3 **Q. BY WHOM AND IN WHAT CAPACITY ARE YOU EMPLOYED?**

4 **A.** I am employed by Evergy Metro, Inc. and serve as Director, Power,  
5 Energy and Revenue Accounting for Evergy Metro, Inc. d/b/a Evergy  
6 Kansas Metro (“Evergy Kansas Metro”), Evergy Kansas Central, Inc. and  
7 Evergy South, Inc., collectively d/b/a as Evergy Kansas Central (“Evergy  
8 Kansas Central”), Evergy Metro, Inc. d/b/a as Evergy Missouri Metro  
9 (“Evergy Missouri Metro”), Evergy Missouri West, Inc. d/b/a Evergy  
10 Missouri West (“Evergy Missouri West”. They are the operating utilities of  
11 Evergy, Inc. (“Evergy”).

12 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND**  
13 **BUSINESS EXPERIENCE.**

1 **A.** I graduated from the University of Missouri-Columbia in May 1992 with a  
2 Bachelor of Science in Accountancy. In October 1997, I joined the  
3 Company as a staff accountant and have held several roles such as  
4 Supervisor - Accounts Receivable, Supervisor - Regulatory Accounting,  
5 Manager - Revenue and Fuel Accounting, Manager - Energy Accounting,  
6 Senior Manager – Accounting, and Director of Energy and Revenue  
7 Accounting before assuming my current role.

8 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**  
9 **PROCEEDING?**

10 **A.** My testimony supports Evergy Kansas Central's request for Commission  
11 approval of the 2023 ACA amount and associated true-up factor related to  
12 the Company's Retail Energy Cost Adjustment ("RECA") tariff. I will explain  
13 the actual revenues and expenses behind the 2022 RECA mechanism  
14 and the resulting ACA true-up factor to be effective and applied for 2023.

15 **Q. WERE THERE ANY CHANGES MADE TO THE RECA TARIFF IN 2022?**

16 **A.** No. There were no changes to the RECA tariff.

17 **Q. IS THERE ANYTHING ELSE IMPACTING THIS ACA FILING THAT**  
18 **SHOULD BE MENTIONED?**

19 **A.** Yes. As ordered by the Commission on June 23, 2022 in the Order  
20 Approving Non-Unanimous Stipulation and Agreement in Docket 21-  
21 EKME-329-GIE, the Company is collecting \$61,079,338 in this ACA filing,  
22 which is the first half of the amount resulting from the mid-February 2021  
23 cold weather event known as Winter Storm Uri.

1 **Q. ARE THERE ANY EXHIBITS FILED WITH EVERGY KANSAS**  
2 **CENTRAL'S ACA APPLICATION PREPARED BY YOU OR PREPARED**  
3 **UNDER YOUR DIRECT SUPERVISION?**

4 **A.** Yes. There are two exhibits, A and B.

5 **Q. PLEASE DESCRIBE THE EXHIBITS.**

6 **A.** Exhibit A summarizes components of the RECA calculation incurred by  
7 Evergy Kansas Central during the ACA period beginning January 1, 2022  
8 through December 31, 2022 used to derive the 2023 Annual Correction  
9 Adjustment for Evergy Kansas Central. Exhibit B illustrates the same  
10 information as Exhibit A but shows the individual monthly components for  
11 the ACA period calculations.

12 **Q. DID EVERGY KANSAS CENTRAL HAVE AN (OVER)/UNDER**  
13 **RECOVERY BALANCE AT THE END OF DECEMBER 2022?**

14 **A.** At the end of 2022 there was an under-recovery. As described in Exhibit  
15 B, the under-recovery balance for the year January 2022 through  
16 December 2022 is **\*\*[REDACTED]\*\***. In summary, Evergy Kansas Central  
17 incurred **\*\*[REDACTED]\*\*** of fuel expense and purchased power less  
18 certain offsets to provide electric service to non-requirements customers.  
19 Evergy Kansas Central recovered **\*\*[REDACTED]\*\*** from retail customers  
20 through the RECA and wholesale customers during the same time period.

21 **Q. PLEASE DESCRIBE THE COMPONENTS OF THE 2022 UNDER**  
22 **RECOVERY.**

1 **A.** The 2022 under recovery is made up of fuel expense and purchased  
2 power \*\* [REDACTED] \*\*  
3 offset by certain costs to provide electric service to non-requirements  
4 customers \*\* [REDACTED] \*\* and the lost revenue  
5 from the expiration of the purchased power contract with Mid Kansas  
6 Electric Company of \*\* [REDACTED] \*\*. As shown in Schedule A, these  
7 amounts are offset with the collection of fuel revenues from customers of  
8 \*\* [REDACTED] \*\*. This totals the \*\* [REDACTED] \*\* under recovery as shown  
9 above \*\* [REDACTED] \*\*.

10 **Q: ARE THERE ANY ADDITIONAL AMOUNTS TO ADD TO THE 2022**  
11 **UNDER RECOVERY?**

12 **A:** Yes. As mentioned above, the amount related to the extraordinary  
13 weather event in February 2021 referred to as Winter Storm Uri of  
14 \$61,079,338 is included per the order approving the Non-Unanimous  
15 Stipulation and Agreement in 21-EKME-329-GIE.

16 **Q. IS THERE ALSO AN UNDER-RECOVERY FOR THE 2021 ACA?**

17 **A.** Yes. The amount under-recovered from the previous ACA year is  
18 \*\* [REDACTED] \*\*. This amount will be added to the 2022 under recovered  
19 components described above and results in a total ACA amount of  
20 \$97,865,616 \*\* [REDACTED] \*\*).

21 **Q. WAS THERE A WESTERN PLAINS WIND FARM EXCESS OR**  
22 **DEFICIENCY FOR THE THREE-YEAR ROLLING AVERAGE 2020 TO**  
23 **2022?**

1 **A.** In the 18-WSEE-328-RTS Non-Unanimous Stipulation and Agreement,  
2 parties agreed that if the Western Plains Wind Farm has a capacity factor  
3 of greater than 48.57%, producing more than 1,193,878 MWhs in any  
4 calendar year, based on a rolling three-year average, beginning with the  
5 three-year period ending December 2020, Evergy Kansas Central will be  
6 allowed to include a charge in the ACA filing to the benefit of Evergy  
7 Kansas Central that equates to the difference between the actual  
8 production and the 1,193,878 MWhs, multiplied by \$20.70/MWh. In the  
9 event that the Western Plains Wind Farm has a capacity factor of less  
10 than 44.57%, producing less than 1,095,556 MWh's in any calendar year,  
11 based on a rolling three-year average beginning in 2020 and using the  
12 three-year average for 2018-2020, there will be a credit in the ACA filings  
13 to return to ratepayers any shortfall in MWh's from 1,095,556 MWhs,  
14 multiplied by \$20.70/MWh. The three-year rolling average for 2020  
15 through 2022 was 45.81%, which falls between the lower end cap of  
16 44.57% and the upper cap of 48.57%. Therefore, there is no adjustment  
17 for the Western Plains Wind Farm in this ACA filing.

18 **Q: WHAT ACTION IS THE COMPANY REQUESTING FROM THE**  
19 **COMMISSION FOR THE PORTION OF THE UNDER-RECOVERY IT**  
20 **PROPOSES TO RECOVER THROUGH THIS ACA FILING?**

21 **A:** Evergy Kansas Central recommends that the Commission approve its  
22 ACA factor that will result in Kansas retail customers reimbursing the  
23 under-recovery amount over a twelve-month period beginning April 1,

1 2023 in accordance with the Company's RECA tariff. As shown in Exhibit  
2 A, this under-collection results in an ACA factor of \$0.4993 cents per kWh  
3 which would be added to the RECA factors for each month beginning April  
4 1, 2023.

5 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

6 **A.** Yes.

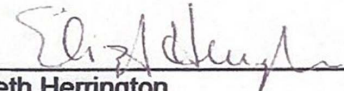
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STATE OF KANSAS            )  
  ) ss:  
COUNTY OF SHAWNEE        )

**VERIFICATION**

Beth Herrington, being duly sworn upon his oath deposes and states that she is the Director Power Energy and Revenue Accounting, for Evergy, Inc. that she has read and is familiar with the foregoing Direct Testimony, and attests that the statements contained therein are true and correct to the best of her knowledge, information and belief.

  
\_\_\_\_\_  
Beth Herrington

Subscribed and sworn to before me this 20<sup>th</sup> day of March, 2023.



  
\_\_\_\_\_  
Notary Public

My Appointment Expires May 30, 2026

**EVERGY KANSAS CENTRAL, INC.  
RETAIL ENERGY COST ADJUSTMENT REPORT  
Energy Cost Adjustment Calculation**

**Docket No.23-EKCE-XXX-ACA  
Exhibit A  
Page 1 of 1**

**ANNUAL CORRECTION ADJUSTMENT**

Public

Annual Correction Factor for the ACA Year Ending **2022**

(a)	(b)	(c)	(d) <u>Cost</u>	(e) <u>kWh</u>
<b>Annual Correction Adjustment Factor</b>				
1 Actual Fuel Costs		$F_A =$		
<u>Fuel</u>	<u>Actual Costs</u>			
2 Account 501				
3 Account 518				
4 Account 547				
5 Total Fuel Costs				
6 Actual Purchased Power Energy Costs		$P_A =$		
7 Winter Weather Storm Uri Fuel Costs				
8 Actual Emission Cost/Revenue		$E_A =$		
9 Actual Cost to Achieve to Non - Requirements Customers		$NRCA_A =$		
10 Actual Fuel Revenues Collected for ACA Year		$FAR_A =$		
11 Wholesale Non-Fuel Delta		$WR =$		
12 Western Plains Wind Farm Excess (after year 2020)		$WPWF_E =$		
13 Western Plains Wind Farm Deficiency (after year 2020)		$WPWF_D =$		
14 Actual ACA Remaining from the previous ACA year		$ACAB =$		
15 <b>Total <math>(F_A+P_A+E_A-NRCA_A-FAR_A+/-WR+WPWF_E-WPWF_D)+ACAB</math></b>			<u>\$ 97,865,616</u>	
16 kWhs delivered to all Requirement Customers during the billing year				$SA =$ <u>19,600,896,283 kWh</u>
17 Projected Annual Correction Adjustment Factor				<u>0.4993 ¢/kWh</u>
	$ACAF_P = \frac{(F_A+P_A+E_A-NRCA_A-FAR_A+/-WR+WPWF_E-WPWF_D)+ACAB}{.01 \times S_A}$			



EVERGY KANSAS CENTRAL, INC  
2022 Actual RECA Monthly Update

Docket No. 23-EKCE-XXX-ACA PUBLIC  
Exhibit B  
Page 1 of 1

Line #	January 2022	February 2022	March 2022	April 2022	May 2022	June 2022	July 2022	August 2022	September 2022	October 2022	November 2022	December 2022	YTD 2022	
1	F <sub>A</sub> Component of the RECA Tariff - Fuel Costs													
2														
3	Account 501													
4	Account 518													
5	Account 547													
6	<b>Total Fuel Costs F<sub>A</sub> Component ( line 3 + line 4 + line 5)</b>													
7														
8	P <sub>A</sub> Component of the RECA Tariff - Purchased Power Costs													
9														
10	Purchased Power													
11	Gain/Loss on Sales of Renewable Energy Credits													
12	Renewable Energy Revenues													
13	<b>Total Fuel Costs P<sub>A</sub> Component (line 10 + line 11 + line 12 )</b>													
14														
15	E <sub>A</sub> Component of the RECA Tariff - Emission Allowances													
16														
17	<b>Total Emission Cost/(Revenue) - E<sub>A</sub> Component</b>													
18														
19	NRCA <sub>A</sub> Component of the RECA Tariff - Cost to Achieve Non-Requirements													
20														
21	<b>Actual Cost to Achieve to Non-Requirements Customers - NRCA<sub>A</sub> Component</b>													
22														
23														
24	FAR <sub>A</sub> Component of the RECA Tariff - Actual Fuel Adjustment Revenues													
25														
26	Wholesale Customer Fuel Revenues (GFR)													
27	Retail Fuel Revenues													
28	DRPS Wind Farm Revenues													
29	Uncollected for Previous Month													
30	Uncollected for Current Month													
31	<b>Total Fuel Adjustment Revenues - FAR<sub>A</sub> (line 26 + line 27+ line 28 + line 29 + line 30)</b>													
32														
33	WR Component Wholesale Non-fuel in Base Rates vs. 2018 Actual													
34														
35	Demand Difference													
36	VOM Difference													
37	MKEC - Lost Revenue													
38	<b>Total Wholesale Non-Fuel Difference (Line 35 + Line 36 + Line 37)</b>													
39														
40	<b>Total Costs (line 6 + line 13 + line 17 - line 21 - line 38)</b>													
41														
42	<b>RECA (Over)/Under Recovery for 2022 (line 40 - line 31)</b>													
43														
44	ACAB Component of the RECA Tariff - Actual ACA Balance From Previous ACA Year													
45														
46	<b>Actual ACA Recovery from Prior Year</b>													
47	ACA Amount from Previous Year's Filing													
48	<b>Total Actual ACA Remaining From the Previous ACA Year</b>													
49														
50	<b>Total (F<sub>A</sub>+P<sub>A</sub>+E<sub>A</sub>-NRCA<sub>A</sub>-FAR<sub>A</sub>+/-WR+WPWF<sub>E</sub>-WPWF<sub>D</sub>)+ACAB</b>													
51														
52	Winter Storm Uri First Half Installment per Docket 21-EKME-329-GIE													
53														
54	<b>TOTAL</b>													
55														
56	S <sub>A</sub> Component of the RECA Tariff - kWh Delivered to Company's Requirements Customers													
57														
58	<b>Total kWhs delivered to Company's Requirements Customers</b>													
59														
60	3.1192	2.4262	3.1587	2.6463	1.4206	3.3622	3.3339	2.7235	2.1838	3.2225	3.1721	3.1842	2.8389	¢/kWh