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

REBUTTAL TESTIMONY OF

DARCIE G. KRAMER

ON BEHALF OF EVERGY KANSAS CENTRAL, INC. AND EVERGY KANSAS SOUTH, INC.

**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

JULY 3, 2025

I. INTRODUCTION

Q: Please state your name and business address.

A: Darcie G. Kramer. My business address is 1200 Main, Kansas City, Missouri 64105.

Q: Are you the same Darcie Kramer who prefiled direct testimony in this docket?

A: Yes.

Q: On whose behalf are you filing this rebuttal testimony?

A: I am testifying on behalf of Evergy Kansas Central ("EKC" or "Company").

Q: What is the purpose of your rebuttal testimony?

A: The purpose of my testimony is to respond to the Staff of the Commission ("Staff") and intervenor testimony on the following issues:

- Staff's Revised Revenue Requirement
- Industry Dues
- Director and Officer Insurance
- Rate Case Expense
- Forfeited Discounts and Bad Debt
- Transmission Elimination
- Customer Advances
- Materials and Supplies
- Amortization of TOU

Specifically, I will be addressing the direct testimonies of Staff witnesses Christina Luke Fry, Joseph Nilges, Bill Baldry, and Andria Jackson. I will also be addressing the direct testimonies of CURB witness Mark Garrett and KIC Commercial Group witness Micheal Gorman.

II. RESPONSE TO STAFF AND INTERVENOR ACCOUNTING ADJUSTMENTS

(1) Staff's Revised Revenue Requirement

Q: Has Staff updated its revenue requirement since its initial filing, as referenced in the direct testimony of Ms. Jackson and Mr. Baldry?

A: Yes. Following their initial filing, Staff posted a revised revenue requirement of $120.7M which reflected a number of post-filing updates and corrections. These changes were communicated to the Company. EKC has reviewed the calculations for those updates and corrections and agrees with their intent. However, EKC disagrees with the proposed methodology on all but two of the adjustments, as explained in the rebuttal testimony of Company witnesses indicated in the list below.

Q: What adjustment topics were updated in Staff's revised revenue requirement and which EKC witness is addressing the calculation issue on each topic?

A: The following items were revised or corrected in Staff's updated revenue requirement:

- Cost of Debt - Ley
- Income Taxes – Company Agrees
- Non-labor distribution maintenance - Klote
- Non-labor generation maintenance - Klote
- Misc/out of period expense (Board of Director's and Director equity comp) - Klote
- Relocation expense - Klote
- Electrification deferred asset amortization – Company Agrees
- Forfeited discounts and bad debt – Kramer
- Transmission elimination – Kramer
- Materials and supplies - Kramer

Q. Where can Staff's revised revenue requirement be accessed?

A: Staff's revised revenue requirement, including updated schedules and supporting documentation, were posted to Core Share on June 26, 2025, in a confidential folder titled "Revenue Requirement Revisions."

(2) *Industry Dues*

Q: Please summarize CURB's position regarding industry dues.

A: CURB witness Mark Garrett recommends disallowance of all Edison Electric Institute ("EEI") membership dues arguing that the Company has not sufficiently distinguished between EEI's services which advocate for its members private interests and services which serve the public interest.[1]

Q: What is your response?

A: EEI provides meaningful benefits to customers through mutual assistance planning, sharing of best practices amongst members, and training programs. CURB's recommendation to disallow these costs overlooks the value these programs deliver. First, EKC recorded 20% of 2023 and 27% of 2024 EEI membership fees to FERC Account 426.4, which is excluded from the cost of service. Second, as explained in my direct testimony, consistent with KCC decisions in past rate cases and with the provisions of K.S.A. 66-4 101f(a), the Company eliminated 50% of EEI membership dues from the requested revenue requirement. This means that, in total, only approximately 33% - 40% of EEI's membership fees are included in the EKC's requested revenue requirement. These limited costs in rates are reasonable in consideration of the benefits EEI provides customers. In contrast, CURB's disallowance of the remainder of EEI membership dues is arbitrary and unreasonable. Such a disallowance

[1] Direct Testimony of Mark Garrett at 38-39.

is significantly beyond recent Commission treatment of EEI membership fees and should not be considered by the Commission in this case.

(3) *<u>Director And Officer ("D&O") Insurance</u>*

Q: Please summarize CURB's position regarding director and officer insurance.

A: Mr. Garrett recommends a 50/50 allocation of D&O insurance between shareholders and ratepayers arguing that officers have a fiduciary duty to put shareholders first, thus some of their costs should be shifted away from ratepayers.

Q: Please summarize the KIC Commercial Group's position regarding director and officer insurance.

A: KIC Commercial Group witness Michael Gorman also recommends an even sharing of D&O insurance costs between shareholders and ratepayers since both benefit from having this insurance coverage.

Q: What is your response?

A: D&O liability insurance is a necessary and prudent cost of doing business that directly supports the utility's ability to provide safe and reliable service to customers. This insurance enables the Company to attract and retain qualified leadership, which is essential for sound corporate governance, regulatory compliance, and effective decision-making - all of which benefits ratepayers. While the insurance protects individual directors and officers, its broader function is to safeguard the utility's operational stability and financial integrity. Therefore, D&O insurance should be fully recoverable through rates as a legitimate and reasonable cost of providing utility service. Disallowance of 50% of the D&O liability insurance costs would be a departure from many years of rate treatment by this Commission for EKC and the recommending parties' have not provided any meaningful analysis or support for the disallowance other than seeking to have shareholders pay for legitimate business costs incurred in providing service to EKC customers.

(4) <u>*Rate Case Expense*</u>

Q: Please summarize Staff's position regarding rate case expense.

A: Staff Adjustment IS-7 reduces the Company's rate case expense; however, Mr. Baldry recognizes that this expense will need to be updated for actual rate case expenses incurred by the Company. Mr. Baldry recommends that rate case expense be amortized over three years.[2]

Q: What is your response?

A: We agree with Staff witness Baldry that rate case expenses must be updated to reflect actual costs incurred. In accordance with the procedural schedule, an updated estimate of these expenses will be submitted to the Commission by July 15, 2025. If a hearing becomes necessary in this proceeding, the associated costs may not be known by the time the updated estimate is submitted. Accordingly, all hearing-related expenses should be deferred and recovered through the amortization of rate case expenses within this docket. To ensure transparency and accuracy, all rate case expenses should be properly documented and accounted for through the procedural schedule's order date of September 29, 2025, or the Commission's final order, plus an additional 30 days to accommodate invoice processing delays.

Q: Does the Company agree with Staff's position for a 3-year amortization period?

A: Yes, this aligns with the Company's proposal.

Q: Was the regulatory asset for rate case expense eligible for tracking in the previous case?

[2] Direct Testimony Staff witness William Baldry, at 23-24.

A: No. Although it appeared alongside other regulatory assets in the supporting document for the 2023 rate case settlement, a footnote clarified that it was not eligible for tracking. Additionally, the settlement agreement included a separate condition that prohibited re-amortization of this asset.

Q: Do you propose any changes to that treatment for the 2025 Rate Case expense regulatory asset?

A: Yes. Given the current economic environment which is driving the need for more frequent rate case filings, the existing three-year amortization period is no longer practical. It often results in unrecovered costs when a new case is filed before the prior amortization period ends. For example, the 2023 rate case expense regulatory asset will only be amortized over 21 of the 36 months originally approved due to the timing of the next case and the absence of tracking authority. To ensure full recovery of these necessary expenses, we propose modifying the treatment of this asset going forward by including rate case expenses in the regulatory assets totals that will be tracked at the conclusion of this rate case. In this way, rate case expenses actually incurred will be appropriately recovered over time when timing between rate cases does align with the three-year amortization period currently being proposed.

(5) *Forfeited Discounts And Bad Debts*

Q: Please respond to Staff's proposed adjustments for forfeited discounts and bad debt.

A: Staff applied the same multipliers for bad debts and forfeited discounts as those proposed by the Company. The only difference remaining stems from Staff applying the multiplier to a lower proposed revenue requirement.

Q: Should the forfeited discount factor and bad debt write-off factor be applied to the ultimate revenue requirement allowed in this case?

A: Yes, the bad debt and forfeited discount factors, that Staff and EKC are in agreement on, should be applied to the final amount of adjusted retail revenues approved in this docket, which includes the gross revenue requirement.

Q: Was there any other element of the forfeited discounts or the bad debt adjustment that you want to discuss?

A: Nothing further at this time. These adjustments were addressed above in subsection (1) regarding Staff's revised revenue requirement, where it was listed among the updated items.

(6) *Transmission Elimination*

Q: Do you agree with Staff's proposed adjustment for the removal of transmission-related costs?

A: EKC agrees in principle with Staff's approach to removing transmission-related costs. However, the calculation of this adjustment is influenced by other components within the revenue requirement model. As those components are updated through settlements or revisions, the transmission cost adjustment should likewise be updated to remain aligned with the overall model.

Q: Was there any other element of the transmission related costs removal adjustment that you want to discuss?

A: Not further at this time. This adjustment was addressed above in subsection (1) regarding Staff's revised revenue requirement, where it was listed among the update items.

(7) *Customer Advances*

Q: Please summarize Staff's position regarding Customer Advances.

A: Staff's Adjustment (RB-7) decreases Evergy's rate base by updating the balance of customer advances used to offset the rate base. Staff calculated a 13-month average using true-up data through March 31, 2025, for both KGE and WSTR, resulting in a lower offset to the rate base.

Q: What is your response?

A: EKC agrees with Staff's position to utilize a 13-month period to analyze WSTR customer advances as the month-to-month balance varies, but when analyzing the data we believe using a March 2025 ending balance for KGE is more appropriate. There were fairly continuous month-to-month decreases in customer advances from April 2023 to March 2025, as provided in support to EKC adjustment RB-71. This downward trend should be reflected in the ultimate balance of customer advances that is included in rate base.

For these reasons, EKC agrees to using a 13-month average for WSTR but recommends using ending balance on KGE. The impact to this on Staff's corrected revenue requirement is approximately a $191K increase to rate base, which is a $16K revenue requirement impact.

(8) <u>*Materials And Supplies*</u>

Q: What is your response to Staff's recommendation that a 13-month average materials and supplies balance be used no matter what the trending is within each type of materials and supplies reviewed?

A: This position is in direct conflict with how the Staff has handled this issue in the past. There has always been use of a hybrid approach where both the Company and Staff analyze the directional nature of the costs. If balances steadily decrease or increase over time, we will use a period end balance. As balances fluctuate over time, we use a thirteen-month average. This ensures the most representative level of balances are reflected in rates. As an example, when reviewing the data for the Lawrence Storeroom location you will see a steady downward trend, so the ending balance of $1,480,757 was used instead of the 13-month average of $1,938,895. This resulted in a reduction of $458,138 to the Materials and Supplies total, overall. A contrasting example is Jeffery Energy Center which had a steady upward trend. The ending balance of $11,477,506 was used instead of the 13-month average of $9,299,421, resulting in an increase of $2,178,085.

As shown in these two examples, a steady trend can create a significant decrease or increase and should be considered. In total, only 8 locations out of about 68 were identified to have steady trends, using the ending balance instead of the 13-month average. For the reasons provided above, the Company recommends using trends on certain storerooms. The impact of this on Staff's corrected revenue requirement is approximately a $3.2M increase to rate base, which is a $266K revenue requirement impact.

Q. Was there any other element of the materials and supplies adjustment you would like to discuss?

A. Nothing further at this time. This adjustment was addressed above in subsection (1) regarding Staff's revised revenue requirement, where it was listed among the update items.

(9) *Amortization Of TOU Marketing And Education Regulatory Asset*

Q: Please summarize Staff's position regarding the amortization of TOU marketing and education regulatory asset.

A: Staff proposed to remove the costs that it claims are promotional advertising costs totaling $11,501 that were included in the deferral balance for the TOU marketing and education regulatory asset. However, Staff did not provide specific reasons for the elimination of such costs in the testimony.

Q: What is your response?

A: The Company disagrees with eliminating these costs. Per the settlement in the 2023 rate case, EKC was allowed to recover marketing and education costs for education of customers on the voluntary residential TOU rate. These costs in the Staff's proposed disallowance are associated with Facebook social media advertising for the optional TOU rates. The social medial company Meta charges us by credit card. These credit card charges are coded to resource 1899-Other Advertising, as compared to other marketing costs that go through the Company's purchase order processing which are coded to resource 1800-Customer Informational Advertising. The costs charged to both 1899 and 1800 resource codes are essentially the same type of costs related to marketing and education and should be allowed for recovery per the settlement in the 2023 rate case.

In addition, EKC shared the TOU marketing and outreach plan with Staff and CURB during an in-person presentation on August 9, 2024. The plan called for social media advertising and included an overall digital marketing budget, and Staff did not provide any feedback or voice any concerns with this component of the advertising plan during that meeting or after.

Q. Does this conclude your testimony?

A. Yes, it does.

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

VERIFICATION

Darcie Kramer, being duly sworn upon her oath deposes and states that she is the Manager Regulatory Affairs, for Evergy, Inc., that she has read and is familiar with the foregoing Testimony, and attests that the statements contained therein are true and correct to the best of her knowledge, information and belief.

Darcie Kramer

Subscribed and sworn to before me this 3rd day of July 2025.

Leslie R. Wines
Notary Public

My Appointment Expires: May 30, 2026

NOTARY PUBLIC - State of Kansas
LESLIE R. WINES
MY APPT. EXPIRES 5/30/2026

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed, this 3rd day of July 2025, to all parties of record as listed below:

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/s/ Cathy Dinges
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