

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

In the Matter of the Evergy Kansas Metro) Docket No. 24-EKME-641-TAR
Transmission Delivery Charge Tariff)

**NOTICE OF FILING OF STAFF'S
REPORT AND RECOMMENDATION**

COMES NOW, the Staff of the State Corporation Commission of the State of Kansas ("Staff" and "Commission," respectively), and files the instant Report and Recommendation ("R&R") regarding Staff's review of Evergy Metro, Inc.'s ("Evergy Kansas Metro") Application for an update in its Transmission Delivery Charge ("TDC") revenues. Evergy Kansas Metro filed a request for \$54,433,101 in TDC revenues, which represents an increase of \$7,103,998 since its last TDC filing.

Staff has performed an audit of EKM's TDC tariff update filing, the findings of which are detailed in-depth herein. Based on its review, Staff recommends the Commission approve a revised TDC revenue amount of \$54,418,396. If approved, EKM's revised TDC would increase an average residential monthly customer bill by \$1.62.

Staff hereby files its Report and Recommendation for Commission review and consideration and for such other relief as the Commission deems just and reasonable.

Respectfully submitted,
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Andrew J. French, Chairperson
Dwight D. Keen, Commissioner
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REPORT AND RECOMMENDATION UTILITIES DIVISION

TO: Andrew J. French, Chairperson
Dwight D. Keen, Commissioner
Annie Kuether, Commissioner

FROM: Andria Jackson, Deputy Chief of Accounting and Financial Analysis
Chad Unrein, Chief of Accounting and Financial Analysis
Justin Grady, Deputy Director
Jeff McClanahan, Director

DATE: April 2, 2025

SUBJECT: Docket No. 24-EKME-641-TAR: In the Matter of the Evergy Kansas Metro
Transmission Delivery Charge Tariff.

EXECUTIVE SUMMARY:

Evergy Metro, Inc. (“Evergy Kansas Metro” or “EKM”), filed a request for \$54,433,101 in Transmission Delivery Charge (TDC) revenues under the Application, which represents a \$7,103,998 increase since its last TDC filing. Additionally, since EKM’s last TDC filing, House Bill 2225 (“HB 2225”) was signed into law. This law amends statute K.S.A. 66-1237 to, amongst other things, revise the return on equity (ROE) portion of the TDC for any local transmission project that was not the result of a notice to construct (NTC) from a regional transmission organization or independent system operator. As such, EKM has also reflected this change in ROE in its 2024 TDC calculation. On May 1, 2024, EKM began billing the updated TDC rates to its retail customers on a subject-to-refund basis pursuant to K.S.A. 66-1237(c), pending the conclusion of Staff’s evaluation and the Commission’s final determination.

Staff has performed an audit of EKM’s TDC tariff update filing, including an in-depth review of: (1) the requested 2024 TDC expense amount to be collected; (2) EKM’s compliance with and the impact of HB 2225 on its non-NTC project costs; and (3) the proposed updated TDC rates calculated for each applicable retail customer class. Based on its review, Staff recommends the Commission approve a revised TDC revenue amount of \$54,418,396. If approved, EKM’s revised TDC would increase an average residential monthly customer bill by \$1.62.

BACKGROUND:

On March 20, 2024, EKM submitted an Application seeking Commission approval to implement changes in its TDC rate schedules. EKM's filing represents an update to the prior TDC approved in Docket No. 23-EKME-666-TAR (the "23-666 Docket"). Supplemental to its filed request, EKM enclosed an original and redline copies of its proposed TDC tariffs, as well as workpapers supporting the calculations. In accordance with K.S.A. 66-1237(c), EKM sought implementation of the new TDC tariffs within 30 business days, requesting May 1, 2024, as the desired effective date.¹

Transmission Costs of Service from Southwest Power Pool

EKM is a transmission-owning member (Transmission Owner, or "TO") of the Southwest Power Pool (SPP), a non-profit Regional Transmission Organization (RTO) that serves the function of a Transmission Provider (TP) to its member-entities. In its role as a TP, SPP acts as an agent for and on behalf of its TOs. One of SPP's functions, as a TP, is administering the billing for the wholesale transmission service provided over member-owned transmission facilities under its Open Access Transmission Tariff (OATT). Accordingly, SPP will collect for the transmission service from the wholesale transmission customers utilizing such service over EKM's transmission facilities and then remits these charges back to the Company.²

Like most load serving entities in the SPP integrated market, EKM also serves as a Network Customer (Transmission Customer, or "TC") under its Network Integration Transmission Service (NITS) Agreement with SPP. When Evergy acts as a TC, SPP provides firm transmission service over the transmission system to EKM for the delivery of capacity and energy from its designated network resources (i.e. generation) to service its network load. Since EKM's retail customers also utilize its transmission system to receive desired energy, EKM's cumulative retail demand, as well as its wholesale demand, is incorporated within the Company's total network load designated under the NITS Agreement with SPP. As such, EKM, in essence, "purchases" transmission service on behalf of its native load customers, thus acting as a wholesale transmission network customer under the SPP OATT. Subsequently, as a TC acting on behalf of its native load, including both wholesale and retail customers, EKM incurs additional zonal and region-wide charges from the SPP. While the Company is compensated for the wholesale native load portion of these SPP charges through payments made by wholesale customers under individual wholesale purchase power agreements (PPAs), it is not made whole until it recovers the remaining portion of the SPP

¹ K.S.A. 66-1237(c) states that "[a]ll transmission-related costs incurred by an electric utility and resulting from any order of a regulatory authority having legal jurisdiction over transmission matters, including orders setting rates on a subject-to-refund basis, shall be conclusively presumed prudent for purposes of the transmission delivery charge and an electric utility may change its transmission delivery charge whenever there is a change in transmission-related costs resulting from such an order. The commission may also order such a change if the utility fails to do so. An electric utility shall submit a report to the commission at least 30 business days before changing the utility's transmission delivery charge. If the commission subsequently determines that all or part of such charge did not result from an order described by this subsection, the commission may require changes in the transmission delivery charge and impose appropriate remedies, including refunds."

² SPP directly bills only the wholesale entities who have explicitly signed the transmission-using membership and service agreements designating SPP (as a TP) to provide transmission service over EKM's (as the TO) facilities. In contrast, "native load" wholesale customers are billed by the Company itself, as EKM purchases transmission service on their behalf.

charges from its retail native load customers. Therefore, the TDC tariff was established to recover the charges SPP assesses to EKM for transmission service to serve its native retail load customers.

EKM, acting as both a TO and TC, incurs a variety of costs related to its investment in the transmission system. This investment includes costs for both facilities that are owned and maintained by the Company (as a TO), as well as costs to utilize facilities that are constructed and maintained by others but that are socialized to EKM (as a TC) as directed by the transmission cost allocation directives of the OATT administered by SPP. The TDC essentially serves as a pass-through mechanism that allows EKM a more timely recovery of the investment costs it incurs, as a TO and TC, to provide retail transmission service. The TDC rates under the current tariff are based primarily on EKM's Annual Transmission Revenue Requirement (ATRR), which is derived from EKM's annual Transmission Formula Rate (TFR) approved by the Federal Energy Regulatory Commission (FERC). In addition to the retail portion of the ATRR, the current TDC tariff also recovers the retail-allocated portion of other SPP charges associated with its provision of retail transmission service.

In its Application, EKM's proposed TDC rates were calculated to recover \$54,433,101 from retail customers, which represents a \$7,103,998 increase from the Company's prior TDC filing in the 23-666 Docket. On April 16, 2024, the Commission issued an Order pursuant to K.S.A. 66-1237 that permitted EKM to implement the requested changes in its TDC rates on a subject-to-refund basis, pending the conclusion of Staff's investigation.

The TDC is, by definition, a state-jurisdictional cost recovery mechanism based on FERC-jurisdictional transmission-related costs. In other words, the prudence of transmission investment and related operations and maintenance costs are determined under the jurisdiction of FERC, whereas Staff's role is ensuring these investments and related costs are appropriately reflected in Kansas customer bills. This point is reiterated in the TDC statute language, which specifically allows for electric utilities, such as EKM, to adjust and recover any transmission-related charges approved by any "regulatory authority having legal jurisdiction over transmission matters."³ Therefore, the basis of Staff's review and recommendation in this docket are to determine: (1) whether the costs included in EKM's TDC were authorized by FERC through its TFR; and (2) whether EKM has properly calculated the resulting TDC rates.⁴

House Bill 2225

On April 13, 2023, Governor Laura Kelly signed HB 2225, which became effective on July 1, 2023. House Bill 2225 amends statute K.S.A. 66-1237 to include a new section regarding the authorized costs allowable for recovery through the TDC and the requirement of public utilities to evaluate and assess the regional rate competitiveness and impact to economic development within the state for any application for a general rate case. This bill also requires any utility implementing a TDC to revise the ROE portion of its TDC for any local transmission project that was not the

³ K.S.A. 66-1237(c).

⁴ It should be noted that, while Staff does not have jurisdiction to review the transmission investments for prudence, EKM's transmission costs are extensively regulated by FERC and transmission customers and Staff have extensive opportunities to ask questions and review data during the annual review process for the TFR. This point is reiterated in the Informal Challenge and Formal Challenge process, which ultimately resulted in the refunds included in the 2023 rate year TFR ATRR. See: "Analysis" section below for additional detail on the TFR review process.

result of a NTC or similar directive from SPP, or any other RTO or independent system operator (ISO) that is regulated by FERC. Staff reiterates the use of the Commission's authorized ROE does not impact any project that was constructed as a result of a NTC or similar directive.

More specifically, with regard to non-NTC project costs, subsection (d)(2) of the statute states:

A for-profit, investor-owned electric utility serving more than 20,000 customers in Kansas may recover, as a component of a transmission delivery charge, transmission-related costs associated with transmission facilities constructed as a result of such utility's internal or local planning processes absent a notification to construct or similar directive from a regional transmission organization or independent system operator that is regulated by FERC, or any successor agency.

In order for a utility to recover the non-NTC project costs as a component of the TDC, the bill requires, beginning January 1, 2024, and prior to April 1, 2024, the Commission to adjust the ROE used to determine the revenue requirement of such costs from the FERC-jurisdictional ROE to the state Commission-approved ROE last used to set the utility's base rates in effect at the time of filing its TDC update. To accomplish this, pursuant to K.S.A. 66-1237 subsection (e), a utility must make a compliance filing with the Commission to adjust the ROE relating to such costs and then make annual compliance filings to the Commission thereafter. The utility must also conduct a technical conference to discuss the details of the compliance filing with Staff and any other Commission-authorized intervenors. Additionally, a public workshop must be held annually for purposes of the utility to present to Staff and other Commission-authorized intervenors the details associated with any transmission projects that are anticipated in the succeeding calendar year.

Furthermore, in regard to TDC update filings going forward, subsection (f) of the statute states:

In any transmission delivery charge update filing, a utility electing to recover the costs described in subsection (d)(2) shall utilize the state corporation commission's authorized return on equity that was used to set the utility's base rates in effect at the time of the update filing or that was stipulated and approved by the commission for use in the transmission delivery charge if a return on equity was not explicitly set during the last general rate case, to determine the utility's transmission delivery charge update.

Staff's review of EKM's efforts to comply with the newly enacted directives of the revised statute, including annual compliance filings, technical conference and public workshops, and reflecting the change in ROE in its 2024 TDC calculation, are discussed in more detail below.

ANALYSIS:

To facilitate its review of EKM's TDC filing, outside of verifying publicly available information, Staff solicited from EKM various data requests including recent copies of SPP billing statements, billing determinants, and usage data used to determine the amount of the transmission costs EKM is responsible for, residential bill impact analysis, etc. Staff also had several discussions with EKM about the charges and TDC calculations.

TDC Amount to be Recovered

EKM incurs a variety of costs related to its investment in transmission assets, including: (1) costs to construct its transmission facilities; (2) costs to operate and maintain its transmission facilities; (3) costs to utilize other utilities' facilities to move power to its retail customers, as well as receives revenues from other utilities for the use of its Company-owned transmission facilities; (4) costs to construct transmission facilities as directed by SPP; and (5) costs of administrative fees assessed by SPP and other regulatory agencies. Many of these costs and charges are determined under the SPP OATT and under the NITS Agreement the Company has with SPP.⁵

Basis of Charge

As outlined in its TDC tariff, EKM is specifically authorized to recover transmission-related charges incurred under the following schedules of the OATT for services offered by SPP to serve its retail customers:

- Schedule 1A – Tariff Administration Service
- Schedule 2 – Point-to-Point (PtP) charges (as assignable to Retail sales)
- Schedule 7 – Firm PtP charges (as assignable to Retail sales)
- Schedule 8 – Non-Firm PtP charges (as assignable to Retail sales)
- Schedule 9 – Network Integration Transmission Service⁶
- Schedule 10 – Wholesale Distribution Service
- Schedule 11 – Base Plan Charge
- Schedule 12 – FERC Assessment Charge
- Other costs associated with Schedule 1 fees for transmission service provided on foreign wires
- SPP Direct Assigned or Sponsored Upgrade Transmission Fees for Customer Upgrades

Additionally, other non-SPP transmission-related charges recorded in FERC Account 565 (Transmission of Electricity by Others), fees charged to the Company by the North American Electric Reliability Council (NERC), and other transmission revenue requirements that are not otherwise reflected in and recoverable through base rates or other Commission authorized rider mechanisms are also included.

The costs listed in the TDC tariff for inclusion in the TDC rider are calculated on the basis of: (1) EKM's FERC-approved TFR to support the costs incurred from its owned facilities; and (2) transmission statements received to support the recovery of transmission-related expenses not relating to transmission facilities owned by the Company.

⁵ Per the OATT, EKM's owned transmission assets, though under the functional control of SPP, are recovered through Schedule 9 as calculated by the Company's TFR. Transmission expansion that is constructed according to SPP's prescribed requirements are collected through a socialization of ATRRs via Schedule 11. Furthermore, under the NITS Agreement with SPP, EKM also incurs additional zonal and region-wide charges associated with purchasing transmission service on behalf of its native load.

⁶ Schedule 9 costs exclude the revenue requirement for all Company-owned transmission facilities classified by SPP as Base Plan Upgrades.

EKM's FERC-approved TFR, which is used to calculate an ATRR necessary to cover the costs of its transmission system, is the most significant data source utilized in the development of transmission charges included in its TDC. Prior to each "rate year" (beginning on January 1 and ending on December 31), EKM calculates its ATRR for the rate year using the Transmission Formula Rate Implementation Protocols (Protocols) set forth in Attachment H of its OATT on file with FERC. The ATRR consists of EKM's projected net revenue requirement (Annual Projection) for the upcoming rate year and a true-up for the previous calendar year (Annual True-Up).

While the approval of the TFR is under the jurisdictional authority of FERC, transmission customers and Staff have the opportunity to review the TFR calculation and supporting data during the annual review process as outlined in the OATT. Specifically, pursuant to Sections I and II of the Protocols, each year EKM must: (1) provide its Annual True-Up to SPP on or before June 1, which is posted on the SPP website and the Open Access Same-Time Information System (OASIS) website, and then hold an open meeting among interested parties no later than July 8; and (2) provide its Annual Projection to SPP on or before September 24, which is also posted on SPP's website and OASIS, and then hold an open meeting among interested parties no later than October 16. Interested parties then have until November 24 following the publication dates of the Annual True-Up and Annual Projection to review the inputs, supporting explanations, allocations, and calculations and to notify EKM in writing of any informal challenges that may arise from its review.⁷ After submitting an informal challenge, an interested party then has until March 1 to submit a formal challenge with FERC. As provided in the Protocols, Staff attends the customer meetings for the postings of the Annual True-Up and the Annual Projection, as well as conducts an annual internal review of the TFR inputs and calculations. Regarding its review for the 2024 rate year, Staff found no discrepancies in EKM's TFR calculation.

EKM's ATRR, as well as the ATRR information for the other SPP TOs, are used to populate SPP's Revenue Requirements and Rate file (RRR File). The RRR File contains all of the revenue requirements and associated rates for all SPP member-entities operating under the functional control of SPP. The RRR File is published to the SPP website and is used to establish transmission rates for those seeking service within, into, or out of SPP. There are two types of service rates, including Network (or NITS) and Point-to-Point (PtP). SPP uses the rates established for each type of service for each member-entity to charge for transmission service over the member TOs transmission facilities, including EKM's facilities. The revenue generated from these charges is collected by SPP and provided back to the TO that owns the transmission facilities.

For the components of the TDC based on the ATRR of the SPP RRR File, an adjustment is made to ensure charges only reflect EKM's retail customer load within its total Network Load designated under the NITS Agreement. This step removes the costs incurred by wholesale customers in order to reflect the total costs at a retail level. This is accomplished by multiplying the total amount of costs related to Schedule 9 and Schedule 11 by the corresponding Load Ratio Share (LRS) of

⁷ Subsequently, pursuant to Section IV of the Protocols, by March 15 of each year, EKM is required to submit an informational filing for its Annual Projection for the rate year, including its Annual True-Up. The informational filing describes any corrections or adjustments made during that period and describes all aspects of the TFR and its inputs that are the subject of an ongoing dispute under the informal and formal challenge procedures.

EKM's retail customer load.⁸ All other schedules and fees that comprise the various components of the TDC rider are directly assigned to retail customers.

TDC Calculation

The detail of EKM's TDC calculation is reflected in the supporting workpapers attached to its Application. The total TDC expense is calculated in a two-step process: (1) the 2024 TDC expense; and (2) the 2023 TDC true-up. Likewise, EKM included two sets of workpapers detailing each component of the total TDC calculation.

The first set of workpapers captures the portion of TDC-related costs authorized by the Commission to be included in the development of the TDC rates for the current year. According to EKM's TDC tariff, the current-year charges are calculated based on the following equation:

$$\text{TDC}_{\text{Filing}} = \text{ATRR}_{\text{Filing}} + \text{Admin} + \text{SPP} + \text{TU}_{n-1}$$

Where:

- $\text{ATRR}_{\text{Filing}}$ – Amount allocated to retail customers for the zonal and regional SPP Schedule 9 and Schedule 11 network service ATRR applicable to the EKM zone, based on the SPP RRR File currently effective at the time of filing of the TDC rate and pursuant to K.S.A. 66-1237.
- Admin – Amount allocated to retail sales for the known and measurable charges for the TDC Year for SPP administration charges under Schedule 1A and NERC assessment charges to EKM.
- SPP – Amount allocated to retail sales for actual amounts incurred during the prior calendar year for: (a) facility charges charged under Schedule 10; (b) FERC assessments charged under Schedule 12; (c) other costs associated with Schedule 1 fees for transmission service provided on foreign wires; and (d) direct assigned charges related to requested upgrades including sponsored upgrades and other direct assigned upgrades, net of credits received for others' use of these upgrades.
- TU_{n-1} – True-up amount to reflect the difference between the actual TDC-related costs authorized to be recovered during the prior TDC year and actual TDC revenues for retail sales during the prior TDC year.

The second set of workpapers captures the true-up component of the TDC calculation. The true-up allows for the differences between actual TDC-related costs and actual TDC-related revenues during a calendar year – whether positive or negative – to be applied in the calculation of the updated TDC rates. For visualization purposes the true-up equation reflected in EKM's TDC tariff is as follows:

$$\text{TU}_n = \text{TDC}_{\text{Actual}} - \text{TDC}_{\text{Rev}}$$

Where:

- $\text{TDC}_{\text{Actual}}$ is the TDC-related costs, as allocated to retail sales, authorized to be recovered during the TDC year including the true-up calculated for the prior TDC year.

⁸ The LRS is the ratio of the retail load to EKM's overall network load.

- TDC_{Rev} is the actual TDC revenues for retail sales during the TDC year. These TDC revenues will be based on the TDC rates in effect throughout the TDC year. Such TDC rates may be changed one or more times during the TDC year, with approval by the Commission. The TDC rates in effect at any point during the TDC year will be applied to retail kWh sales or kW billing demands, as applicable, during the effective period of each such approved TDC rate.

To reiterate the terms of the TDC cost component between the two-part calculation, the TDC tariff and true-up mechanism is set up to recover only actual charges unless projected costs are calculated within the TFR.⁹ That is, with the exception of the Schedule 9 and Schedule 11 ATRR amounts, the costs reflected in the true-up (identified as “TDC_{Actual}”) and the costs reflected in the prior-year TDC (“TDC_{Filing}”) should remain the same. This simplifies the nature of the TDC to being a recovery mechanism based simply on the difference between intended and actual revenue recovery.¹⁰ The over- or under-collection resulting from the difference is then added to the current year TDC calculation when the TDC rates are updated.

Staff Review Process and Findings

Staff conducted a multi-step process in its review of EKM’s requested TDC amount, including a review of the cost inputs and calculations of the two components of the total TDC expense. Likewise, Staff’s discussion and findings are presented for the two components individually below.

2024 TDC Expense

The basis of Staff’s review process for evaluating the 2024 TDC expense component reflected in EKM’s total requested TDC, as well as the respective steps taken to accomplish each part of the review, are as follows:

- Verify the Schedule 9 and Schedule 11 zonal and regional ATRR costs reflected in the 2024 TDC amount were approved by FERC. This information is available publicly and can be accessed through two online sources – OASIS and the SPP website. First, Staff accessed EKM’s OASIS page to review its annual TFR True-Up and Annual Projection publications, as well as the supporting accounting change questionnaires, input support documents, and discovery requests and responses supporting the TFR for the rate year 2024. Staff also utilized the SPP website, which includes access to the RRR filings and the SPP OATT. In doing so, Staff is able to verify that the amounts reflected in the FERC-approved TFR tie to the RRR File amounts included in the TDC calculation.
- Validate the accuracy of the known and measurable SPP Schedule 1A and NERC charges calculated for inclusion in the TDC for the year 2024. Per the SPP OATT, the Schedule 1A charge is calculated as the product of the Schedule 1A rate and the TC’s

⁹ This coincides with the implementation of EKM’s TFR, which includes a true-up for projected ATRR versus actual ATRR.

¹⁰ In other words, the true-up calculation applies a simple comparison between what EKM was authorized to recover versus what was actually billed and collected from customers based on the approved TDC tariff for the previous TDC year.

billing determinants.¹¹ As such, Staff multiplied the SPP Schedule 1A fees, which are broken out and posted on the SPP website for the year, with the prior year billing determinants obtained through discovery. With regards to verifying the NERC fees, which are billed quarterly, Staff requested and obtained the NERC invoices for the first and second quarter of 2024 to match to the quarterly amounts included in the TDC filing. Staff then took the quarterly amount, as reflected in the invoices provided, and multiplied it by four to calculate the annual amount of the charge to be recovered.

- Validate the actual SPP charges requested for recovery are assessed by SPP during the prior year under the allowable SPP OATT schedules per the tariff. Staff requested and received invoices supporting the 2023 actual SPP charges assessed under Schedule 10, Schedule 12, other Schedule 1 fees associated with service provided on foreign wires, and SPP direct assigned or sponsored upgrade fees (or “Z2 credits”). Staff also reviewed supporting general ledger detail, which included a breakdown of the invoiced charges by charge types, to verify that the TDC only includes the amounts under the SPP OATT schedules allowable for recovery. The sum of these amounts was then tied to the charges included in the filing.
- Verify the total transmission delivery charges are properly allocated on the retail level. Through the discovery process, Staff was able to review invoices, spreadsheets with the load measurements, etc., to verify the LRS calculation. With this information, Staff was able to examine a few supplementary processes performed by EKM to arrive at the individual retail transmission delivery charges.

Staff has reviewed the requested data provided by EKM through the discovery process, including the SPP and NERC invoices and the load and usage data submitted by EKM in support of its TDC calculation. Staff was also able to verify information provided by EKM with the data published on the OASIS and SPP websites. In addition to verifying the total input costs, Staff conducted a mathematical check on the TDC calculation to ensure the requested TDC amount was calculated correctly without errors (i.e. formula errors, input errors, etc.).

Overall, Staff finds that EKM’s TDC filing accurately reflects the nature of the costs it incurs from SPP on behalf of its retail customers to provide transmission service and that its 2024 TDC charges were calculated correctly in its Application. The transmission-related costs included in EKM’s total requested 2024 TDC amount is \$53,749,982.

2023 True-Up

As previously stated, with the exception of the change in ATRR associated with Schedule 9 and 11, the cost component included in the TDC true-up calculation of the current-year filing should match the current-year TDC calculation approved in the prior year filing. As such, the basis of Staff’s review process for the 2023 true-up component reflected in EKM’s total requested TDC, as well as the respective steps taken to accomplish each part of the review, are as follows:

- Verify the revised Schedule 9 and Schedule 11 zonal and regional ATRR costs reflected in the true-up. Staff utilized the SPP website to access the RRR filings effective during

¹¹ The billing determinants are the sum of the prior calendar year’s average of the twelve monthly coincident peak demands multiplied by the number of all hours of the applicable month.

the year 2023. In doing so, Staff was able to verify each of the total monthly charges effective throughout the year for these costs. Staff then checked the formula used to calculate the annual total to ensure the costs for each verified charge were correctly pulled into the final average calculation of these costs reflected in the true-up.

- Verify the amounts for the remaining cost components based upon the prior-year amounts approved for recovery in its 2023 TDC filing. Staff accessed the TDC workpapers EKM filed in its last TDC filing, as well as the respective Commission Order approving the requested TDC, published on the Commission website. In doing so, Staff was able to tie-out the Commission-approved costs included in the 2023 TDC filing with the respective costs amounts included in the current year filing. Additionally, through the discovery process, Staff also spot-checked these costs by reviewing invoices and general ledger detail, broken down by charge-type. While these costs were reviewed using the same review process as described above for the 2024 TDC expense, this was done as a final step of ensuring errors were not inadvertently overlooked in the previous audit, information remained the same, and that there was no prior-year correction to be made.
- Verify the total revenue reflected in the offsetting revenue component of the true-up. Through the discovery process, Staff was able to review details of the 2023 revenue data pulled directly from the Company's customer billing system. In order to verify the revenues collected, Staff was able tie out the revenue amounts, broken down by rate code, to the general ledger detail recorded in 2023 under the TDC resource codes.

During the course of its audit, Staff found one calculation error present within the calculation of the 2023 true-up. In its requested amount, EKM applied a 0% LRS to the ATRR adjustment made to remove the balanced portfolio amounts recovered through the property tax rider. This excluded amount resulted in an overstated total of the revenue requirement for charges allocated to Kansas retail customers. Staff recommends correcting this calculation error by applying the appropriate LRS allocation of 87.1% to these credited charges. This results in a decrease of \$14,705 in the Kansas retail allocated charges, or a revised 2023 true-up amount of \$668,414.¹² Staff found no other errors in the data and calculations supporting the total 2024 TDC amount during the course of its audit.

Conclusion

Staff recommends the Commission approve a revised 2024 TDC recovery amount of \$54,418,396, consisting of: (1) EKM's requested 2024 TDC expense totaling \$53,749,982; and (2) Staff's revised 2023 true-up amount totaling \$668,414.

HB 2225 Compliance and Calculation of Revised ROE for Non-NTC Project

Following EKM's last TDC filing, HB 2225 was signed into law to make various amendments to K.S.A. 66-1237, with an effective date of July 1, 2023. As part of the amendments, Evergy was required to submit a compliance filing for the Commission's review of its project investments in its transmission system in its region. Following multiple discussions with Staff, Evergy submitted its first annual compliance filing on September 15, 2023, in Docket No. 24-EKME-253-CPL ("24-

¹² See Exhibit ANJ-1.

253 Docket"). The compliance filing process provides the Commission an open forum with an expanded view of EKM's transmission planning process, its project prioritization strategies for replacement of existing transmission facilities and upgrades, and near-term projected transmission project investment in EKM's territory. Since the compliance filing process, as amended in K.S.A. 66-1237, does not require any specific Commission action be taken on the transmission investment, Staff is presenting the information in its Report in the Annual TDC Update.

Another aspect of the amended K.S.A 66-1237 relates specifically to the utilities' filing of a TDC update, and its inclusion of an adjusted ROE for any transmission projects that have not received an NTC from SPP. Per the statute, the utility must modify its ROE to the most recent Commission-approved ROE reflected in base rates for any non-NTC transmission projects. EKM reflected this change from a 11.1% ROE included in its FERC-approved TFR to the 9.4% ROE included in its 2024 TDC calculation. As part of the Unanimous Settlement Agreement in the 23-775 Docket, the settling parties agreed that the Commission-approved ROE of 9.4% would be utilized for the purposes of setting the ROE in transmission delivery charge filings required by HB 2225.¹³

Evergy Compliance Filing

In the compliance filing planning process, Staff had several interactions with EKM to discuss the details of its plans for the upcoming filings as well as anticipated transmission projects investments planned for the 2024 and 2025 rate year. Evergy's first compliance filing was made on September 15, 2023, in the 24-253 Docket. Subsequently, in accordance with the amended K.S.A. 66-1237, Evergy held a technical conference with Staff and CURB at the Commission office on November 28, 2023, to discuss transmission project investment.¹⁴

Furthermore, the Commission held a Public Workshop to review Evergy's transmission project investment on January 10, 2024, allowing the Commission, Staff, and CURB to ask questions regarding Evergy's transmission planning process, EKM project prioritization, the SPP Cost Allocation Process for transmission investment, and transmission projects included in the filing. The Public Workshop allows the Commission to remain informed on Evergy's transmission projects, which flow through Evergy's transmission formula rates and are recovered through the TDC charge from Evergy's retail customers.

Qualifying Transmission Projects

The compliance filing process initiated by HB 2225 and amendments to K.S.A. 66-1237 allows the Commission additional information and oversight into transmission projects that are under Evergy's control and captured in the zonal ATRR billed through the TDC. These projects are often identified to address reliability, safety, operational flexibility, asset condition, and/or qualified under Evergy's Local Planning Criteria. Transmission investments directed by SPP

¹³ "In the Matter of the Joint Application of Evergy Kansas Central, Inc., Evergy Kansas South, Inc., and Evergy Metro, Inc. for Approval to Make Certain Changes in their Charges for Electric Service", Order Approving Joint Motion for Approval of Phase-In of Certain Rate Impacts and Settlement Agreement, issued October 24, 2024 ("23-775 Docket" and "23-775 Order"); Unanimous Settlement Agreement, p.8, Part F, ¶ 21.

¹⁴ The Technical Conference with the intervening parties allowed Evergy to share any confidential information with Staff and CURB on transmission project status, cost drivers, and estimated in-service dates. The technical conference allowed Evergy to ask questions on what material to include or omit from the upcoming Commission's Workshop on Evergy's transmission investment.

through its Integrated Transmission Planning (ITP) process are not meant to be captured in Evergy's compliance filings. When SPP identifies transmission project upgrades necessary to serve its ITP process for regional transmission reliability, SPP issues an NTC. This results in the zonal and regional cost sharing for qualifying transmission projects under the currently approved SPP transmission cost allocation methodology.

In the compliance filing, EKM addressed its qualifying transmission projects that were in excess of \$15 million with a projected in-service date in 2024 and 2025. At the time of the filing, Evergy noted that certain transmission projects were still undergoing SPP's ITP evaluation processes for issuance of an NTC with an anticipated decision expected in early 2024. EKM's cost estimates and in-service dates for its projects were based on the anticipated scope of the project, permitting/siting processes, project interdependencies, equipment or labor availability, and funding availability compared to other potential projects. Based on the available data, Evergy projected that its qualifying project investment in EKM transmission system totaled \$61.5 million through 2025.¹⁵

As described in K.S.A. 66-1237, Evergy classified each transmission project into the following three categories:

- 1) New Builds – Project is greenfield or expansion of existing infrastructure.
- 2) Upgrade – Project increases ampacity of existing assets.
- 3) Rebuild – Project is like-for-like replacement.

Upon reviewing the project detail, Evergy noted that multiple transmission projects had the potential to be classified into different categories and/or included hybrid elements of a category description. For each transmission project, Evergy presented the following information: (a) project identifier or name; (b) the anticipated in-service date; (c) the projected cost; (d) the specific location within the utility's system; (e) whether the project is classified as a new build, rebuild, upgrade or any other appropriate classification; (f) a description providing the purpose for the project and the anticipated reliability benefits; (g) a description of the original vintage of the replaced facilities if the project is classified as a rebuild or upgrade; and (h) the load additions or economic development benefits accommodated by the project, if any.

In the 2024 Compliance filing, Evergy presented a category for Panasonic and other new load related transmission investments for infrastructure growth in Evergy's transmission systems located around the area of De Soto, KS. New load investments included a single project for the Atlantic 345 – 115 kV New Substation and transmission lines with an estimated cost of \$28.7 million. EKM's investment only included a portion of the project for the 345 kV transmission line extension. EKM anticipated that the project would receive an NTC from SPP as part of its ITP process in early 2024. The transmission project was not expected to be placed in service until 2025; therefore, EKM's TDC rates in this filing were not impacted by any new load related transmission investment in the current period.

¹⁵ EKM's transmission project investment includes estimated costs calculated in its FERC-approved TFR, which does not include the cost-allocation process in calculating TDC rates for EKM's retail customers.

TDC Filing Implementation of HB 2225

In the TDC filing implementation for HB 2225, EKM reflected a reduction in its FERC-approved ROE of 11.1% in its TFR to the KCC-approved ROE of 9.4% for Non-NTC zonal projects to calculate its TDC rates.¹⁶ To perform the calculation for the reduction in its ROE, EKM restated the ATRR in its TFR workpapers to include a 9.4% ROE for its zonal transmission projects. The reduction in amounts between the TFR workpapers with the 11.10% ROE and the restated TFR workpapers with the 9.4% ROE were then removed from the TDC. On a total company basis, the impact of implementing the change in ROE from 11.1% to 9.4% resulted in a total ATRR reduction of \$5,514,851 consisting of: (1) a reduction to Zonal ATRR for Evergy Metro Zone 6, Schedule 9 charges totaling \$5,453,083; and (2) a reduction to TO ATRR for Sponsored Upgrades not charged by SPP in Schedules 9 and 11 totaling \$61,768.¹⁷ Following a native system load ratio share adjustment of approximately 87% and a KS retail allocation adjustment of approximately 47%, the Kansas retail customer impact for the reduction in ROE to 9.4% resulted in savings of nearly \$2.3 million. Staff calculated and verified that EKM excluded the appropriate amounts from its ATRR calculations in its TDC filing for the change in ROE.

Based on its review, Staff finds EKM fully complied with all the provisions in HB 2225 and amendment to K.S.A. 66-1237. Specifically, EKM provided a detailed review of its projected zonal transmission investment in the 24-253 Docket and restated its ROE to the KCC-approved ROE of 9.4% for qualifying zonal projects in its TDC calculation in the 24-641 Docket.

Calculation of the TDC Charge for Each Retail Rate Schedule

The TDC-related revenue requirement is collected by applying a TDC rate, developed for each retail rate schedule permitting such cost recovery, to each applicable customer's bill. This is accomplished in a two-step process.

The first step is to allocate the TDC-related costs to be included in the development of the TDC rates (the amount derived from the "TDC_{Filing}" equation discussed in the analysis above) by the demand allocator for each applicable retail customer class (DA_{Class}). Per EKM's TDC tariff, the demand allocator to be used for allocating the charges to the respective customer classes is to be based on the 12-coincident peak (12-CP) allocation methodology.¹⁸ The use of a 12-CP allocation is similar to the methodology used by SPP to assess transmission charges.¹⁹ The 12-CP allocator

¹⁶ "In the Matter of the Joint Application of Evergy Kansas Central, Inc., Evergy Kansas South, Inc., and Evergy Metro, Inc. for Approval to Make Certain Changes in their Charges for Electric Service", Order Approving Joint Motion for Approval of Phase-In of Certain Rate Impacts and Settlement Agreement, issued October 24, 2024 ("23-775 Docket" and "23-775 Order"); Unanimous Settlement Agreement, p.8, Part F, ¶ 21.

¹⁷ It should be noted that these are total Company amounts. After applying the appropriate native system LRS and Kansas retail allocation percentages to these amounts, the resulting impact of changing the ROE lowers the Kansas revenue requirement by \$2,287,923. The individual reductions to the Kansas revenue requirement for the ROE changes to Zonal ATRR and Sponsored Project ATRR charges total \$2,258,484 and \$29,439, respectively.

¹⁸ Twelve coincidental peaks (12-CP) refer to the class usage during the system peak load during each month of the year. The hour of the month for the system peak load may not be the hour that a class has its peak load. The matching of the system peak load and the class usage during that hour is the reason the allocator is referred to as coincidental peak.

¹⁹ SPP calculates the NITS charges based on each NITS customer's proportionate share of the total system transmission load using a 12-CP methodology. This calculation determines each NITS customer's "load ratio share" of the SPP transmission system load. As such, SPP uses EKM's LRS to determine EKM's bill for NITS.

used to allocate the TDC-related charges to the retail rate schedules is the 12-CP allocator from EKM’s most recently completed retail rate case – the 23-775 Docket – and is based on the test year ending September 30, 2022. Specifically, the Unanimous Settlement Agreement approved by the Commission in the 23-775 Docket explicitly details the TDC allocation methodology EKM would use in the instant docket, stating:

The Parties agree to accept Staff’s Evergy’s 12 CP allocator for use in the EKM TDC, as set out in Table 6.²⁰

For reference, the 12-CP allocators as reflected in “Table 6” of the Unanimous Settlement Agreement are presented in the table below.

TABLE 6

Kansas Metro	
Residential	51.98%
Res DG	0.08%
SGS	5.87%
MGS	12.17%
LGS	22.37%
LPS	7.34%
EV	0.02%
Lighting	0.18%
Total Metro Retail	100.000%

The second step is the calculation of a per-unit TDC charge for each retail rate schedule to collect the allocated portion of the TDC-related charges. The calculation of the per-unit TDC charge depends on whether the schedule’s per-unit charge is demand based (per kW) or energy based (per kWh). For a demand-based charge, the dollar per kW charge is determined by dividing the portion of the TDC-related charges allocated to a particular rate schedule by the annual applicable kW sales for that rate schedule.

$$\text{TDC}_{\text{kW Rate (Class)}} = \frac{\text{TDC}_{\text{Filing}} \times \text{DA}_{\text{Class}}}{\text{kW}_{\text{Class}}}$$

For an energy-based charge, the cents per kWh charge is determined by dividing the portion of the TDC-related charges allocated to a particular rate schedule by the annual applicable kWh sales for that rate schedule.

$$\text{TDC}_{\text{kWh Rate (Class)}} = \frac{\text{TDC}_{\text{Filing}} \times \text{DA}_{\text{Class}}}{\text{kWh}_{\text{Class}}}$$

²⁰ *Joint Motion for Approval of Unanimous Settlement Agreement*, 23-775 Docket, p. 25, ¶ 76 (Sep. 29, 2023).

Under the provisions of the TDC tariff, the class normalized billing demands (kW_{Class}) and the class normalized energy (kWh_{Class}) are to be based on the normalized billing determinants utilized in its most recent retail rate case. Further, like the component of the charge based on the 12-CP allocator (DA_{Class}), the billing determinants used to develop the rates for each class shall remain unchanged until the next general rate class in which class normalized billing demands and energy are specifically reset, or at a minimum, once every five years, to limit cost shifting among retail classes.

Staff reviewed EKM's allocation of the TDC expense and verified the calculation of the TDC rates computed for each rate schedule are correct. While Staff agrees with EKM's computation of the TDC rates in its Application, Staff's recommended change to the TDC revenue amount changes the TDC rates to be applied to each customer class. Therefore, Staff recommends approval of the revised TDC rates shown in the attached Exhibit ANJ-2, which are calculated using the same methodology but based on its recommended revised TDC amount.

RECOMMENDATION:

Staff finds that EKM fully complied with the requirements of HB 2225 and its amendment of K.S.A. 66-1237, including EKM's filing of the Compliance filing in 24-253 Docket and its reduction in calculating the return for zonal non-NTC transmission projects using the Commission approved ROE of 9.4%.

Staff recommends the following:

1. The Commission approve its revised TDC revenue amount of \$54,418,396, or an increase of \$7,089,293.
2. Upon approval, EKM shall submit revised tariffs consistent with the rates presented in Exhibit ANJ-2 to reflect Staff's recommended change.
3. EKM files future compliance filings in accordance with HB 2225 and amendments to K.S.A.66-1237 in the 24-253 Docket.²¹

²¹ The Commission is not required to take any action related to EKM's compliance filing. Staff requests that the 24-253 Docket remain open for EKM's future compliance filings.

Evergy Kansas Metro
2023 TDC True-up for the 2024 TDC Filing
TDC Calculation - Revised

Docket No. 24-EKME-641-TAR
Exhibit ANJ-1

TDC Calculation - Revised 2023 TDC True-up for the 2024 TDC Filing								
SPP Rates Effective (ATRR _{Filing})								
Line #	SPP Schedule 9 and Schedule 11 Zonal and Regional Revenue Requirements for Every Metro Zone 6	SPP Tariff Schedule	Annual Revenue Requirement	Native System LRS	Native System Network Service Costs	KS Retail Allocation	KS Retail Revenue Requirement	
1	Every Metro Zone 6 Zonal ATRR	Schedule 9	\$ 69,936,806	87.0795%	\$ 60,900,592	46.9085%	\$ 28,567,553	
2	Every Metro Zone 6 BPF Zonal ATRR: NTC prior to June 19, 2010	Schedule 11	\$ 268,305	87.0795%	\$ 233,638	43.2877%	\$ 101,137	
3	Every Metro Zone 6 BPF Zonal ATRR: NTC on or after June 19, 2010	Schedule 11	\$ 19,132	87.0795%	\$ 16,660	43.2877%	\$ 7,212	
4	Every Metro Zone 6 ATRR Reallocated to Balanced Portfolio Region-wide ATRR	Schedule 11	\$ -	0.0000%	\$ -	43.2877%	\$ -	
5	Every Metro Zone 6 Base Plan Zonal ATRR to pay Upgrade Sponsors	Schedule 11	\$ 191,734	87.0795%	\$ 166,961	43.2877%	\$ 72,273	
6	Region-wide Allocation to Every Metro Zone 6	Schedule 11	\$ 40,364,506	87.0795%	\$ 35,149,194	43.2877%	\$ 15,215,281	
7	Total ATRR for Every Metro Zone 6		\$ 110,780,482		\$ 96,467,045		\$ 43,963,456	ATRR _{Filing}
Known & Measureable Charges (Admin)								
SPP Administration Charges and NERC Fees for Retail Load			SPP Tariff Schedule	Native System Network Service Charges		KS Retail Allocation	KS Retail Charges	
8	SPP Administrative Fee	Schedule 1A			\$ 5,007,291	43.2877%	2,167,542	
9	NERC Fees	Non-SPP			\$ 938,903	43.2877%	406,430	
10	Total Charges				\$ 5,946,194		\$ 2,573,971	Admin
Actual Charges (SPP)								
SPP Charges for Retail Load not included above (includes non-SPP Acct 565 amounts)			SPP Tariff Schedule	Native System Network Service Charges		KS Retail Allocation	KS Retail Charges	
11	Facility Charges on Every Metro System	Schedule 10			\$ -	43.2877%	-	
12	FERC Assessment Fees	Schedule 12			\$ 1,383,995	43.2877%	599,100	
13	Every Metro Retail Load on Foreign Wires (all costs)				\$ -	43.2877%	-	
14	SPP PIP Charges for Wind for Retail Load	Schedule 2,7,11			\$ -	43.2877%	-	
15	Other 565 Retail - Non-SPP	Non-SPP			\$ -	43.2877%	-	
16	SPP Direct Assigned Transmission Customer Costs charged by SPP	Z2 Schedule 7, 8			\$ 3,082,028	43.2877%	1,334,139	
17	Total Charges				\$ 4,466,023		\$ 1,933,239	SPP
Known & Measureable TFR ATRR, Etc. (Other)								
Line #	Other TFR ATRR Amounts, Etc. to be Collected in TDC	SPP Tariff Schedule	Annual Revenue Requirement	Native System LRS	Native System Network Service Costs	KS Retail Allocation	KS Retail Revenue Requirement	
18	Transmission Owner ATRR for Sponsored Upgrade not charged by SPP in Schedules 9 & 11	n/a	\$ 1,028,023	100.0%	1,028,023	46.9085%	482,230	
19	TFR ATRR Adjustment to reflect Amounts recovered though Property Tax Rider (Every Metro Zonal)	n/a	(7,604,414)	87.1%	(6,621,882)	46.9085%	(3,106,225)	
20	TFR ATRR Adjustment to reflect Amounts recovered though Property Tax Rider (Base Plan)	n/a	(245,050)	87.1%	(213,388)	43.2877%	(92,371)	
21	TFR ATRR Adjustment to reflect Amounts recovered though Property Tax Rider (Balanced Portfolio)	n/a	(39,011)	87.1%	(33,970)	43.2877%	(14,705)	
22	TFR ATRR Adjustment to reflect Amounts recovered though Property Tax Rider (Sponsored)	n/a	(109,780)	100.0%	(109,780)	46.9085%	(51,496)	
23	Total Other		\$ (6,970,231)		\$ (5,950,998)		\$ (2,782,567)	Other
Total TDC-related Costs to be Included in TDC True-Up Calculation								
24	Total Annual Transmission Cost without True-Up (Line 7 + Line 10 + Line 17 + Line 23)				\$ 100,928,263		\$ 45,688,099	
25	Prior Year True-Up					2022 True-up	1,060,015	TU _{n-1}
26	Total Annual Transmission Cost including prior year True-Up (Line 24 + Line 25)						\$ 46,748,114	TDC _{Filing}
TDC Revenues & True-Up Calculation for TDC Year								
27	Total TDC Revenues (for months: January - December)					2023 TDC Revenue	\$ 46,079,700	TDC _{Rev}
True-Up for TDC Year (to be applied to TDC rate for the following TDC year) (Line 26 - Line 27)						2023 True-Up	668,414	TU _n

Evergy Kansas Metro
2024 TDC Filing
Kansas Transmission Delivery Charge Rider Rate Calculation and Impact Workpaper - Revised

Inputs

TDC Expenses		Proposed	Current	Change
2023 TDC True-Up	\$	668,414	2022 TDC True-Up \$	1,060,015 \$ (391,601)
2024 Metro TDC Expense		53,749,982	2023 Metro TDC Expense	46,269,088 7,480,895
2024 Total Metro TDC Expense	\$	54,418,396	2023 Total Metro TDC Expense	\$ 47,329,103 \$ 7,089,293

Proposed Rate Schedule	\$ per kWh	\$ per kW
Residential Service	\$ 0.00995	
Residential DG	\$ 0.00553	
Small General Service	\$ 0.00930	
Medium General Service		\$ 2.41703
Large General Service		\$ 2.46714
Large Power Service		\$ 3.34489
CCN (incl BEV & ETS)	\$ 0.01121	
Lighting Service	\$ 0.00253	

Demand Allocation of TDC Expenses and Calculation of Class TDC Rate

	Residential	Residential DG	Small General	Medium General	Large General	Large Power	CCN (BEV & ETS)	Lighting	Total
Demand Allocator (12 CP Method) ¹	51.98%	0.08%	5.87%	12.17%	22.37%	7.34%	0.02%	0.18%	100.00%
Allocated 2024 Metro TDC Expense	\$ 28,285,090	\$ 41,618	\$ 3,193,970	\$ 6,624,161	\$ 12,171,262	\$ 3,996,908	\$ 9,197	\$ 96,190	\$ 54,418,396
Total kW ¹				2,740,623	4,933,350	1,194,928			
Total kWh ¹	2,842,048,102	7,524,913	343,379,566				820,221	38,031,957	
TDC Rate per kW				\$ 2.41703	\$ 2.46714	\$ 3.34489			
TDC Rate per kWh	\$ 0.00995	\$ 0.00553	\$ 0.00930				\$ 0.01121	\$ 0.00253	

Typical Monthly Charge

	Residential	Residential DG	Small General	Medium General	Large General	Large Power	CCN (BEV & ETS)	Lighting	
Number of Customers ¹	2,804,857	9,503	300,295	47,392	13,264	501	3,132	19,409	3,198,353
Typical Usage (kW)				58	372	2,385			
Typical Usage (kWh)	1,013	792	1,143				262	1,960	
Typical Monthly TDC Charge	\$ 10.08	\$ 4.38	\$ 10.63	\$ 140.19	\$ 917.78	\$ 7,977.56	\$ 2.94	\$ 4.96	Proposed rates * Typical Usage
Typical Previous Monthly TDC Charge	\$ 8.46	\$ 6.61	\$ 8.31	\$ 122.81	\$ 933.73	\$ 5,986.45	\$ 1.90	\$ 13.74	Current rates * Typical Usage
Typical Change in Monthly TDC Charge	\$ 1.62	\$ (2.23)	\$ 2.32	\$ 17.38	\$ (15.96)	\$ 1,991.12	\$ 1.03	\$ (8.78)	
	19%	-34%	28%	14%	-2%	33%	54%	-64%	

Note: (1) Values from General Rate Case Docket No. 23-EKCE-775-RTS

Residential Rate Impact					
Residential General Use 2RS1A Effective December 2023:	Current	Proposed	Typical usage 1013 kWh Current	Proposed	Residential Impact
Customer Charge (per Month)	\$ 14.25	\$ 14.25	\$14.25	\$14.25	
Energy Charge (per kWh)					
Summer Season					
First 1000 kWh per month	\$ 0.10021	\$ 0.10021	\$101.51	\$101.51	
Over 1000 kWh per month	\$ 0.10021	\$ 0.10021			
Winter Season					
First 1000 kWh per month	\$ 0.07735	\$ 0.07735	\$78.36	\$78.36	
Over 1000 kWh per month	\$ 0.07735	\$ 0.07735			
Rates Effective as of March 2024:					
ECA	\$ 0.01716	\$ 0.01716	\$17.38	\$17.38	
TDC	\$ 0.00835	\$ 0.00995	\$8.46	\$10.08	\$1.62 19%
PTS	\$ 0.00228	\$ 0.00228	\$2.31	\$2.31	
EER	\$ 0.00005	\$ 0.00005	\$0.05	\$0.05	
Typical Monthly Bill - Summer Season			\$143.96	\$145.59	\$1.62 1%
Typical Monthly Bill - Winter Season			\$120.81	\$122.43	\$1.62 1%
Annual Impact (4 Summer, 8 Winter)			\$1,542.32	\$1,561.77	\$19.45 1%

CERTIFICATE OF SERVICE

24-EKME-641-TAR

I, the undersigned, certify that a true and correct copy of the above and foregoing Notice of Filing of Staff's Report and Recommendation was served via electronic service this 2nd day of April, 2025, to the following:

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