

**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 ) Case No. ER-2022-0129  
to Implement A General Rate Increase for Electric )  
Service )

In the Matter of Evergy Missouri West Inc. d/b/a )  
Evergy Missouri West’s Request for Authorization to ) Case No. ER-2022-0130  
Implement A General Rate Increase for Electric )  
Service )

**RESPONSE OF RENEW MISSOURI IN SUPPORT OF STAFF’S  
RECOMMENDATION TO REJECT EVERGY’S PROPOSED TARIFF  
SHEETS RIDER AND MOTION TO OPEN A NEW DOCKET**

COMES NOW Renew Missouri Advocates d/b/a Renew Missouri, by and through the undersigned counsel and pursuant to the Commission’s June 2, 2023 *Order Shortening Time for Responses*, and submits this Response in Support of Staff’s *Recommendation to Reject Evergy Metro and Evergy Missouri West’s Proposed Tariff Sheets Rider and Motion to Open a New Docket*. For its Response, Renew Missouri states the following:

1. On May 19, 2023, the electric utilities Evergy Metro Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (collectively “Evergy” or “the Company”) submitted proposed revised tariff sheets that would increase the Solar Block Subscription Charge for the Company’s Solar Subscription program (“the Program”) from the current \$0.1284 per kWh to \$0.14436 per kWh. The Company provides no explanation, analysis, accounting, testimony, or other documentation to support this price increase.

2. On June 1, 2023, the Staff for the Public Service Commission (“Staff”) submitted its Recommendation and Motion to which this filing is responsive. Staff recommended that the Commission reject the proposed tariff change and made a motion that a separate docket be

opened so that Staff might further audit the program and determine if the proposed rates are calculated correctly, if the facility is used and useful, and if the costs were incurred prudently. Staff also raised the issue of whether subscribers are enrolled in the appropriate rate plan, and suggested that this issue be dealt with in the new EO docket as well.

### Discussion

Renew Missouri agrees with Staff that the proposed tariff sheets should be rejected, and joins Staff's Motion to open a separate EO docket to be conducted within 45 days.

In its memo accompanying its Recommendation and Motion, Staff states that the proposed increase to the Solar Block Subscription Charge is not consistent with the Stipulation and Agreement in EA-2022-0043, specifically paragraph 11 which states that the Solar Block Subscription Charge should not exceed \$0.13880 per kWh. Staff also notes that there is no reason the Service and Access Charge should be related to the completion of any solar resource. Without thorough justification and transparent analysis, Evergy should not be given authority to increase its subscription charge.

In addition to the reasons in Staff's memo, increasing the charge goes against the intent of the tariff as agreed to by the parties and approved by the Commission, particularly where the tariff states:

When an additional solar resource is added to the Program, the levelized cost of the new solar resource will be averaged with the remaining levelized cost of existing solar resource(s) to determine the new price for the cost of the Solar Block. Additional solar resources will be added only if the price is less than or equal to the previous price or otherwise deemed beneficial relative to the standard rates.

The above tariff language not only protects customers from Evergy building unnecessarily expensive new program additions, but acknowledges that solar costs should be decreasing, not

increasing, in the future. As the program expands to greater scale, and as solar costs decrease nationwide as they have for decades, so too should the subscription charge for Evergy's program.

Raising the program's subscription cost is intolerable in the context of the current solar environment in the country. There are several drivers for reduced solar costs, specifically for utility-scale solar. In addition to the aforementioned decades-long trend of declining panel and install costs, there is the recent Federal Inflation Reduction Act (IRA) legislation. The IRA not only increases the solar Investment Tax Credit from 22% to 30% and extends it through 2032, but it provides a new mechanism for utilities to monetize the value of the ITC. In addition, the IRA establishes additional 10% ITC for things like meeting domestic content requirements and for being located in certain energy communities. And finally, as Evergy's Solar Subscription program expands in scale, the Company should be able to compete for lower total costs as the projects reach greater economies of scale. If the Solar Block Subscription Charge is to have any relation to the current market for utility-scale solar, it should be seeing a steep decline in the near future, and certainly should not be seeing any increase.

If Evergy is allowed to increase its program subscription charge from the current charge which is already far too high, Renew Missouri will have no choice but to withdraw its support for the program and encourage its supporters to do the same. Furthermore, Renew Missouri may join other parties to challenge the prudence of any solar projects intended for the program whose costs are out of sync with the national utility-scale market. Solar is a mature technology that saves customers money in every other context. We cannot support a program that overcharges customers for a product that should be reducing their bills.

WHEREFORE, Renew Missouri submits this Response in Support of Staff's June 1<sup>st</sup> Recommendation and Motion in this case, and respectfully requests that the Commission reject Evergy's proposed tariff sheets and instead open a separate EO case to deal with these issues.

Respectfully Submitted,

/s/ **Andrew J. Linhares**

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COUNSEL FOR RENEW MISSOURI  
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Certificate of Service

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 7th day of June 2023:

/s/ **Andrew J. Linhares**