

Exhibit No.: _____
Issue(s): Renewable Energy Credits
Witness/Type of Exhibit: Marke/Surrebuttal
Sponsoring Party: Public Counsel
Case No.: EO-2022-0064 and EO-2022-0065

SURREBUTTAL TESTIMONY

OF

GEOFF MARKE

Submitted on Behalf of the Office of the Public Counsel

**EVERGY METRO, INC. D/B/A
EVERGY MISSOURI METRO
AND
EVERGY MISSOURI WEST, INC. D/B/A
EVERGY MISSOURI WEST**

CASE NOS. EO-2022-0064 AND EO-2022-0065

July 6, 2022

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Fourth Prudence Review of)
 Costs Subject to the Commission-Approved Fuel) Case No. EO-2022-0064
 Adjustment Clause of Evergy Metro, Inc. d/b/a)
 Evergy Missouri Metro)

In the Matter of the Tenth Prudence Review of)
 Costs Subject to the Commission-Approved Fuel) Case No. EO-2022-0065
 Adjustment Clause of Evergy Missouri West,)
 Inc. d/b/a Evergy Missouri West)

AFFIDAVIT OF GEOFF MARKE

STATE OF MISSOURI)
) **ss**
COUNTY OF COLE)

Geoff Marke, of lawful age and being first duly sworn, deposes and states:

1. My name is Geoff Marke. I am a Chief Economist for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my surrebuttal testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.



 Geoff Marke
 Chief Economist

Subscribed and sworn to me this 6th day of July 2022.



TIFFANY HILDEBRAND
 My Commission Expires
 August 8, 2023
 Cole County
 Commission #15837121



 Tiffany Hildebrand
 Notary Public

My Commission expires August 8, 2023.

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SURREBUTTAL TESTIMONY

OF

GEOFF MARKE

EVERGY METRO and EVERGY MISSOURI WEST

CASE NOS. EO-2022-0064 and EO-2022-0065

1 **I. INTRODUCTION**

2 **Q. What are your name, title, and business address?**

3 A. Geoff Marke, PhD, Chief Economist, Office of the Public Counsel (“OPC”), P.O. Box 2230,
4 Jefferson City, Missouri 65102.

5 **Q. What are your qualifications and experience?**

6 A. I have been in my present position with OPC since 2014 where I am responsible for
7 economic analysis and policy research in electric, gas, water, and sewer utility operations.

8 **Q. Have you testified previously before the Missouri Public Service Commission?**

9 A. Yes. A listing of the Commission cases in which I have previously filed testimony and/or
10 comments is attached in Schedule GM-1.

11 **Q. What is the purpose of your surrebuttal testimony?**

12 A. I respond to the rebuttal testimony of Missouri Public Service Commission Staff (“Staff”)
13 witness Cynthia M. Tandy who presents Staff’s recommendation that the Commission
14 disallow costs of \$4 million for Evergy Missouri Metro (“Metro”) and \$300K for Evergy
15 Missouri West (“West”) (collectively “Evergy”) for imprudent managerial inactions due to
16 their failure to sell Renewable Energy Credit’s (“REC’s”) to offset fuel costs for their
17 customers.

18 **Q. What is your position?**

19 A. I support its recommendation that the Commission disallow these costs. The rest of my
20 testimony will respond to Staff’s testimony by:

21 1.) Providing additional background on this issue;

22 2.) Explaining how renewable energy usage claims have evolved;

1 3.) Explaining how REC prices have increased; and

2 4.) Explaining how past arguments excusing the inaction of Evergy's management
3 are no longer credible or prudent

4 I conclude my testimony with an update on excess customer losses within the FAC related
5 to Evergy management's uneconomic wind Power Purchase Agreements ("PPAs").

6 **II. RENEWABLE ENERGY CREDITS**

7 **Q. What is a Renewable Energy Credit ("REC")?**

8 A. A REC is a certificate corresponding to the environmental attributes of energy produced
9 from renewable sources. RECs can be sold within compliance markets as a means to track
10 progress towards, and compliance with, states' statutorily enabled Renewable Energy
11 Standards ("RES") or in a voluntary markets for customers who wish to claim renewable
12 energy actions. Buying RECs allows an entity to support renewable energy without having
13 to install solar panels or wind turbines. RECs can be purchased in one state and applied for
14 compliance in another state. For example, a REC generating facility can be located in
15 Florida, where the actual power produced goes to the local grid in Florida, but the credit for
16 the "renewable attributes" of that power would be purchased by a Missouri utility and used
17 to meet the Missouri RES. Thus, the REC represents a "societal benefit" as well as a
18 tradeable commodity.¹ This is also known as an "unbundled" REC, as the energy produced
19 from the REC is not physically delivered to the customers purchasing it.² The price of these
20 RECs can vary greatly by resource type (e.g. wind, solar, hydro), from location-to-location,

¹ To prevent "double counting" (in this scenario) the renewable energy produced in Florida cannot be counted for renewable compliance purposes in Florida as the REC has been sold to Missouri.

² As opposed to a bundled REC which is tied to the purchase of electricity.

1 state-to-state, and year-to-year, in part, due to a state’s RES geographic sourcing
2 conditions.³

3 Importantly, one can purchase a REC and can “claim emissions reductions” even if the
4 purchaser does not actually reduce their emissions at all—or even increase them. The
5 purchase of a REC does not necessarily mean that “new” renewable energy supply was
6 created, often RECs are sold from existing renewable energy sources and can be “banked”
7 for up to three years. That fact and implications from it will be addressed further in my
8 testimony.

9 **Q. Did Staff file managerial imprudence disallowance recommendations over Evergy’s**
10 **failure to sell RECs in the past?**

11 A. Yes. In Case No. EO-2019-0068⁴ Staff recommended a disallowance of \$350,351 based on
12 its assertion Kansas City Power & Light Company (“KCPL”) was imprudent in its
13 management of its RECs during the FAC Prudence Review Period for that case. Staff
14 witness Kory Boustead wrote:

15 Staff claims that KCPL is in violation of its Rider FAC tariff⁵ by not attempting to
16 sell unused RECs that are not needed to meet the RES and including those revenues
17 in the FAC rider. KCPL’s Rider FAC provides specific language and treatment of
18 such revenues:

19 R = Renewable Energy Credit Revenue:

20 Revenues reflected in FERC account 509000 from the sale of
21 Renewable Energy Credits that are not needed to meet the Renewable

³ That is, a state’s Renewable Energy Standard can be drafted to count RECs on more narrowly defined areas. For example: only in the state, only in surrounding states, only in a given utilities ISO region, or more broadly, from anywhere in the United States. In Missouri, RECs can be purchased for compliance anywhere in the United States, but RECs purchased in Missouri can claim additional “adder” compliance value. Unbundled RECs are almost always less expensive than producing the energy through renewable resources.

⁴ Two files, EO-2019-0199 and EO-2019-0068, were consolidated into EO-2019-0067 for administrative ease. Of note, the Report and Order issued in EO-2019-0067 does differentiate the specific issues germane to each case by their original filed dockets.

⁵ Kansas City Power and Light Company P.S.C. Mo. No. 7, Second Revised Sheet No. 50.14.

1 Energy Standards. In short, customers are to receive the benefit of
2 revenues from the sale of un-needed RECs through KCPL's FAC

3 In short, customers are to receive the benefit of revenues from the sale of un-needed
4 RECs through KCPL's FAC.⁶

5 **Q. Did OPC respond to Staff's recommended disallowance in that case?**

6 A. Yes. I testified in that case in support of Staff's recommended disallowance.⁷

7 **Q. What was KCPL's position in Case No. EO-2019-0068?**

8 A. KCPL asserted the following showed that the Commission should not make any prudence
9 disallowance:

- 10 1. KCP&L had historically considered customer-financed renewable programs
11 such as Ameren Missouri's "Pure Power" program, but ultimately elected to
12 propose a Renewable Energy Rider and a Solar Subscription Pilot Rider instead;
- 13 2. KCP&L has some large customers who have announced corporate goals to
14 reduce their carbon footprint consistent with the Corporate Energy Buyers'
15 Principles;
- 16 3. The City of Kansas City announced a 40% greenhouse gas emission reduction;
- 17 4. 32% of KCP&L's Customer Advisory Panel said they were "very concerned
18 about the environment;" and
- 19 5. Customers who generated monthly usage amounts of 1,000 kWh only
20 experienced a \$0.02 per month increase as a result of KCP&L's inaction.⁸

21 **Q. What did the Missouri Public Service Commission decide?**

22 A. In its Report and Order in Case No EO-2019-0067 et al. the Commission stated:

⁶ Case No. EO-2019-0067 Rebuttal Testimony of Kory J. Boustead p. 3, 1-10.

⁷ See GM-2 and GM-3 for a copies of the Rebuttal Testimony of Geoff Marke in Case No. EO-2019-0067 Public and Confidential respectively.

⁸ Ibid. p. 2, 1-10.

1 The Commission finds that KCPL was not imprudent in choosing not to sell the
2 RECs. KCPL’s surveys showed its customers valued its ability to demonstrate that
3 a key component of the power it sold was provided from renewable energy
4 resources. Its largest customer had announced plans to reduce their carbon footprint
5 by using more renewable energy resources for the power they consumed. KCMO
6 had announced it had cut greenhouse emissions by 50%, and its Council had
7 authorized participation in KCPL’s “Renewables Direct Program” to help the city
8 procure 100% of the City’s municipal electricity from carbon free sources. More
9 than half of the Missouri customer members of KCPL’s Customer Advisory Panel
10 had said they were “likely” or “somewhat likely” to participate in a solar program if
11 offered by KCPL at a cost of \$5 to \$10 per month. KCPL’s tariff mandated no
12 customer poll, and it is the decision of the Commission that KCPL’s conclusion that
13 its customers wanted to retain the environmental attributes of their power was
14 adequately supported.⁹

15 **Q. Given that decision why is Staff again recommending a prudency disallowance for**
16 **Energy allowing unused RECs to expire rather than selling them?**

17 A. Staff witness Cynthia M. Tandy provides the following reasons:

- 18 • The value of selling a REC has increased significantly since the Commission’s
19 Report and Order in Case No. EO-2019-0067. The value of RECs has increased from
20 approximately \$[0].84 per REC to as high as \$7.00 per REC;
- 21 • The required RECs for Missouri has increased from 10% to 15% (50% increase)
22 starting January 1, 2021. Even with the increase in the required amount of RECs in
23 Missouri for 2021, the amount of available RECs for consideration of selling has
24 increased and will likely continue to increase.;

⁹ Case No. EO-2019-0067 Report and Order p. 23-24.

- 1 • The significant increase in the amount of [Evergy’s] excess and/or expired RECs
2 grew consistently and continues to increase. The expired RECs has gone from
3 425,580 in 2017 to 1,850,711 in 2021 (even with the 15% increase in required RECs
4 in 2021);
- 5 • According to Allied Market Research on renewable energy, RECs had a nationwide
6 value in the market of \$881.7 billion in 2020 and expect to reach \$1,977 billion by
7 2030. Staff has also reviewed various other resources on the REC market along with
8 the future market of RECs. Therefore, it seems there will be a tremendous growth in
9 REC value in the market over the next ten years;
- 10 • Evergy’s 2021 Integrated Resource Plan indicates its renewable energy sources from
11 wind is anticipated to increase from 27% in 2020 to 33% in 2030; and,
- 12 • There are other electric companies in Missouri and other states that continue to sell
13 their excess RECs to help offset costs to customers.¹⁰

14 **Q. Do you agree with Staff?**

15 A. Yes.

16 **Q. Are Staff’s reasons all-inclusive?**

17 A. Not in my opinion. I believe that the Commission erred in its decision in Case No. EO-
18 2019-0068 regarding how renewable energy usage claims are made and the passage of time
19 has only amplified that error. I further believe the previous argument regarding the *de*
20 *minimis* customer impact to customers¹¹ as a result of Evergy’s failure to act has eroded and
21 runs in direct contrast to how prudent utilities operate who seek to control costs and
22 maximize value for both customers and shareholders.

¹⁰ Case No. EO-2022-0065 Rebuttal Testimony of Cynthia M. Tandy p 3, 17-21 thru p. 4, 1-16.

¹¹ “KCPL’s consideration that the credit to customers of approximately \$0.02 per month per 1,000kWh was *de minimis* and outweighed by KCPL’s customers’ desires to receive energy bundled with their corresponding renewable energy credits and thereby reduce their carbon footprint.” Case No. EO-2019-0067 Report and Order p. 25.

1 **Q. How is it that the Commission erred in its decision about how renewable energy claims**
2 **are made?**

3 A. Answering that question requires an understanding of how renewable energy claims are
4 made. The Climate Disclosure Project’s RE100’s whitepaper “Making Credible Renewable
5 Electricity Usage Claims”¹² states:

6 1. Claiming use of renewable electricity

7 RE usage claims are claims by a specific grid customer or group of customers to be
8 receiving or consuming RE, and/or claims by a supplier or distributor to be
9 delivering or supplying RE to a specific grid customer or group of customers. In
10 other words, these are an electricity user’s claims to specified renewable generation.

11 For example:

12 *“Our company uses renewable electricity.”*

13 *“Our company uses wind energy to make this product.”*

14 *“This facility is solar powered.”*

15 *“This group of customers is receiving renewable electricity.”*

16 *“We procured renewable electricity for all our operations.”*

17 Making claims around the use of RE requires the defining of renewable “attributes”
18 of generation, or that which defines the manner of production as renewable.
19 Attributes include everything that identifies the generation source and all non-power
20 outputs, including the fuel type, location, greenhouse gas (GHG) emissions and the
21 other environmental and social impacts and benefits of the electricity generation.
22 Defining and allocating generation attributes contractually is essential since physical
23 electricity is indistinguishable based on how it was produced and untraceable on a

¹² Braslawsky, J, et al (2016) “Making Credible Renewable Electricity Usage Claims” RE100.
<https://www.there100.org/sites/re100/files/2020-09/RE100%20Making%20Credible%20Claims.pdf> See also GM-4.

1 grid with many different connected generation sources. In other words, generation
2 attributes are not physically delivered or knowable, and use of specified electricity
3 on a shared grid can only be determined contractually.

4 Therefore, making credible RE use claims depends largely on effectively tracking
5 RE attributes, verifying exclusive delivery by generators and suppliers, and
6 verifying exclusive ownership of attributes by grid customers buying RE.¹³

7 Further, the United States Environmental Protection Agency (“US EPA”) includes a specific
8 section on its webpage on this issue titled *Guidance in Making Claims* which provides the
9 following excerpts and/or summary of these various resources on this issue including:

10 *The Legal Basis for Renewable Energy Certificates*

11 “There is a strong legal basis for the use of RECs as instruments that
12 represent the attributes of renewable electricity generation. RECs are not
13 controlled by any one organization or group of organizations, and neither are
14 they instruments of recognition or donation. Rather, RECs are a part of the
15 machinery of U.S. electricity markets, used to demonstrate renewable
16 electricity purchasing, delivery, and use within the broader context of
17 functioning voluntary and compliance renewable electricity markets.” This
18 document provides a summary of how different authorities have recognized
19 the role of RECs in the United States.¹⁴

¹³ RE100 is a global initiative bringing together the world’s most influential businesses committed to 100% renewable electricity. Led by the Climate Group and in partnership with CDP, our mission is to accelerate change towards zero carbon grids at scale. Over 370 Companies have made commitments to go 100% renewable. see also: <https://www.there100.org/re100-members>

¹⁴ Jones, T. et al. (2014) *The Legal Basis for Renewable Energy Certificates*. *Center for Resource Solutions*. <https://resource-solutions.org/wp-content/uploads/2015/07/The-Legal-Basis-for-RECs.pdf> See also GM-5.

1 *Guidelines for Renewable Energy Claims: Guidance for Consumers and*
2 *Electricity Providers*

3 “Homes and businesses that generate on-site renewable energy—from a
4 rooftop solar photovoltaic system, for example—can claim the renewable
5 energy their system generates only if they are retaining the RECs created by
6 the system. REC ownership is usually determined by the contract between
7 the system owner and the owner of the facility the system is mounted on,
8 which means that the owner of the house or building might not own the
9 renewable energy.” This two-page issue brief provides “an overview of the
10 role of RECs and examples of claims issues between hosts, utilities, and
11 owners.”¹⁵

12 *Solar Energy on Campus: Renewable Energy Usage Claims*

13 “As centers of innovation and social progress, more colleges and universities
14 are pursuing clean energy solutions—in particular, solar energy. ...It is
15 important to understand how various solar purchasing options align with the
16 institutional goals you hope to meet. Importantly, your institutional goals
17 might manifest in certain benefits and claims that you and your colleagues
18 plan to make, which could be rendered inaccurate based on the structure of
19 your chosen purchasing option. Failing to understand or consider the relevant
20 purchasing mechanisms involved in transactions of renewable energy could
21 negatively affect the non-financial or environmental value of your
22 investment in solar.” This report “describes RECs, why they are important,
23 and what kinds of statements can be made depending on who owns them.”¹⁶

¹⁵ Center for Resource Solutions (2016). *Guidelines for Renewable Energy Claims: Guidance for Consumers and Electricity Providers* <https://resource-solutions.org/wp-content/uploads/2015/07/Guidelines-for-Renewable-Energy-Claims.pdf> See also GM-6.

¹⁶ Center for Resource Solutions. (2016) *Solar Energy on Campus* <http://resource-solutions.org/wp-content/uploads/2016/08/Solar-Energy-on-Campus-I.pdf> See also GM-7.

1 *Renewable Electricity: How do you know you are using it?*

2 This National Renewable Energy Laboratory publication explains the nature
3 of RECs, on what basis a consumer of electricity can claim to be using
4 renewables, and how RECs are tracked throughout the United States to ensure
5 they are not double-counted.¹⁷

6 *Federal Trade Commission: Guides for the Use of Environmental Marketing*
7 *Claims*

8 This Federal Trade Commission document summarizes the revisions to
9 the Guides for the Use of Environmental Marketing Claims, effective as of
10 October 11, 2012. The Commission modified sections for the following
11 claims: General Environmental Benefit, Compostable, Degradable, Ozone,
12 Recyclable, and Recycled Content. Additionally, the Commission created
13 the following new sections: Carbon Offsets, Certifications and Seals of
14 Approval, Free-of, Non-toxic, Made with Renewable Energy, and Made with
15 Renewable Materials.¹⁸

16 *National Association of Attorneys General's Environmental Marketing Guidelines*
17 *for Electricity*

18 “It is the purpose of these guidelines to: 1) diminish the potential for
19 deceptive environmental marketing by providing guidance to the electric
20 power industry as it undertakes to craft its advertising and information
21 campaigns, 2) facilitate compliance with the law by providing industry with
22 an interpretation by the Attorneys General of what state prohibitions on

¹⁷ National Renewable Energy Lab (2015) Renewable Electricity: How do you know you are using it?
<https://www.nrel.gov/docs/fy15osti/64558.pdf> See also GM-8.

¹⁸ 7 Federal Trade Commission Guides For the Use of Environmental Marketing Claims 16 C.F.R. § 260.15 (2015),
viewed February 01, 2016, <https://www.ftc.gov/enforcement/rules/rulemakingregulatoryreform-proceedings/guides-use-environmentalmarketing-claims> See also GM-9.

1 deceptive and misleading advertising mean in the context of environmental
2 advertising for electricity, and 3) offer a model for state legislation and/or
3 rulemaking.”¹⁹

4 **Q. Now that you have provided an understanding of how renewable energy claims are**
5 **made, how is it you view that the Commission erred in its decision in Case No. EO-**
6 **2019-0068 regarding how renewable energy usage claims are made?**

7 A. None of the examples KCPL cited and the Commission relied on in its Report and Order,
8 including the City of Kansas City, Walmart, Ford, or individual residential customers from
9 KCPL’s customer advisory panel, who either made green pledges or who have merely
10 indicated that they look more favorably on KCPL actions as a result of its renewable energy
11 costs can *claim the use of renewable electricity* absent a contract defining the renewable
12 “attributes” they are claiming.

13 Citing to Evergy’s non-sale of RECs as the basis for claiming renewable electricity would
14 be double-counting, and, depending on the claim, subject to legal action.

15 **Q. Why can’t Evergy customers who pay their electric bill that includes an amount that**
16 **pays for renewable energy credibly claim that they are using renewable energy?**

17 A. The above cited authoritative sources suggest they cannot and, further, that they could be
18 subject to legal action if they do so. If they make this claim, it would be a form of
19 “greenwashing”—a “process of conveying a false impression or providing misleading
20 information about how a company's products are more environmentally sound.
21 Greenwashing is considered an unsubstantiated claim to deceive consumers into believing
22 that a company's products are environmentally friendly.”²⁰ Again, citing the US EPA:

¹⁹ National Association of Attorneys General’s (1999) Environmental Marketing Guidelines for Electricity
https://www.epa.gov/sites/default/files/2018-05/documents/naag_0100.pdf See also GM-10.

²⁰ Kenton, W. (2022) “Greenwashing” *Investopedia*. <https://www.investopedia.com/terms/g/greenwashing.asp>

1 **Why Double Counting Matters**

2 The effect of double counting is that the environmental benefits of a certain REC are
3 counted twice—once by the legitimate REC owner and once by the other claimant.
4 Double counting skews the marketplace by falsely depicting a greater number of
5 organizations or people making claims about using renewable resources.

6 **For organizations, double counting can also lead to credible accusations of**
7 **greenwashing and can severely hurt an organization’s credibility.** Both the
8 Federal Trade Commission [“FTC”] and the National Association of State Attorney
9 Generals have issued guidance on legal implications of making fraudulent claims.
10 (Emphasis added)²¹

11 In my opinion, KCPL’s argument for ignoring the cost savings for its customers from selling
12 unused RECs (and ultimately the argument the Commission relied on) directly supports
13 double counting, would be considered “greenwashing,” and would be subject to potential
14 FTC (or other legal) action if claimed as such by any entity other than the Company.

15 **Q. How has the public’s understanding of renewable electricity usage claims changed**
16 **over time?**

17 A. The public’s understanding has evolved insofar as consumers are much more aware of
18 concerns over “green washing” and “additionality.”²² As evidence by the aforementioned
19 authoritative sources and the increased demand for unbundled RECs, the importance of
20 credible claims of renewable energy attribution need to be followed to successfully support
21 renewable goals and not undermine them. Moving forward, a greater emphasis on

²¹ US EPA. (2022) “Green Power Markets: Double Counting” <https://www.epa.gov/green-power-markets/double-counting#:~:text=Double%20counting%20skews%20the%20marketplace,severely%20hurt%20an%20organization's%20credibility.>

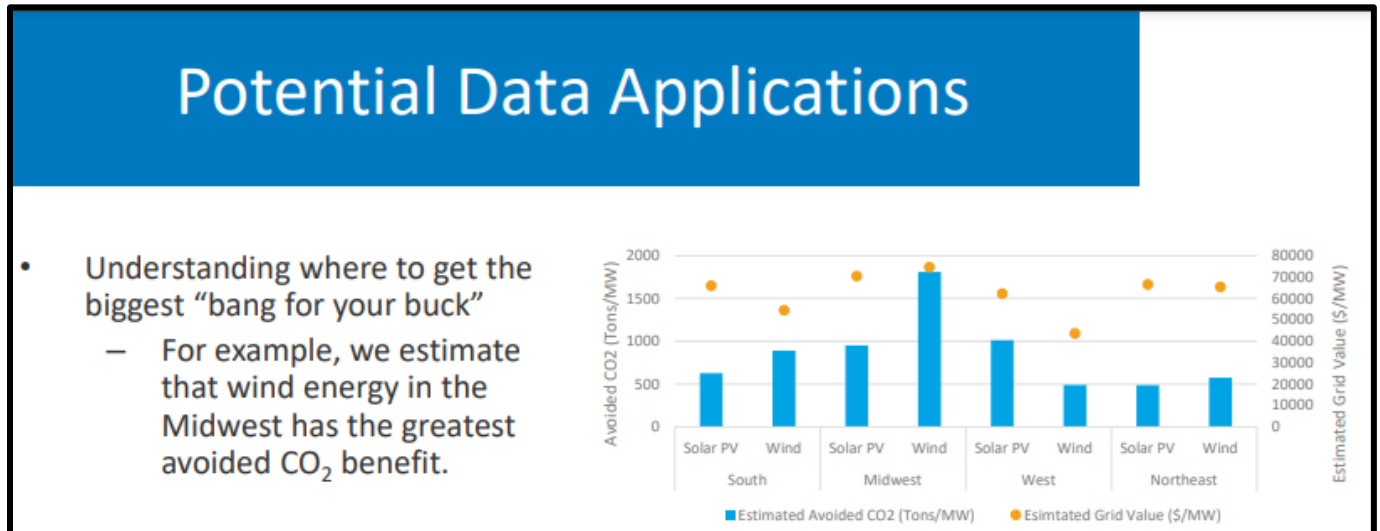
²² Additionality is a concept within renewable energy that refers to organizations directly adding new capacity for renewable energy to the national grid. Organizations can achieve additionality by committing to and investing in green power generators in a way that allows them to fund *new* renewable power generation. I spoke about this in length in my rebuttal testimony in EO-2019-0067. See also GM-2 and GM-3 in this case.

renewable energy location, timing and grid impact will most certainly further differentiate the value of a REC. Marketed correctly (or at all), Evergy’s RECs should garner a greater value than a REC from Puget Sound Energy in Washington.

Q. Why?

A. Given the resource/market make-up of those two locations, the Evergy REC sourced from Midwest Wind in the South West Power Pool has a greater chance of displacing fossil fuel than a Puget Sound REC sourced from hydro in the Pacific Northwest.²³ This assertion is supported in Figure 1 which is a reprint of a part of that National Renewable Energy Laboratory’s (“NREL’s”) *Status and Trends in the Voluntary Market (2020 data)* presentation at the Renewable Energy Markets Conference identifies Midwest Wind as a greater value than all other renewable resources in the country.

Figure 1: Grid Value of Renewable Resource and Location²⁴



In Evergy’s most recently filed rate cases, Evergy witness Chuck Caisley spends a considerable amount of time on Evergy’s marketing efforts. More than any utility that I can

²³ This is discussed in greater detail in “The Climate Disclosure Project’s RE100’s whitepaper “Making Credible Renewable Electricity Usage Claims.” See also GM-4.

²⁴ Id. slide 27.

1 think of. Putting aside the questionable premise of marketing to captive customers in the
2 first place, marketing Evergy's unique REC elements does make sense and should be a part
3 of Evergy's managerial practices.

4 **Q. What do other electric utilities do with their RECs?**

5 A. I am not aware of any other utility in the United States that does not sell their excess RECs.
6 In Missouri, both Ameren Missouri and Liberty sell their excess RECs, and have various
7 renewable energy options for their customers. In contrast, despite routinely having excess
8 RECs, Evergy passively has let its RECs expire.

9 **Q. Do you agree with Staff that the price of RECs have increased considerably since the
10 Commission decided Case No. EO-2019-0068?**

11 A. Yes. The markets for bundled and unbundled RECs varies considerably and is not the most
12 transparent. That being said, the aforementioned NREL report provides an annual update
13 on the Utility Green Pricing Programs across the United States. According to a September
14 29, 2021 presentation titled "Status and Trends in the Voluntary Market (2020 data)":

15 From December 2020 to August 2021, REC prices (nationally sourced, Green-e
16 Eligible) increased from \$1.50/MWh to \$6.60/MWh.²⁵

17 Those numbers are a bit lower than Staff's disallowance recommendation, but not out of the
18 realm of reasonableness.²⁶

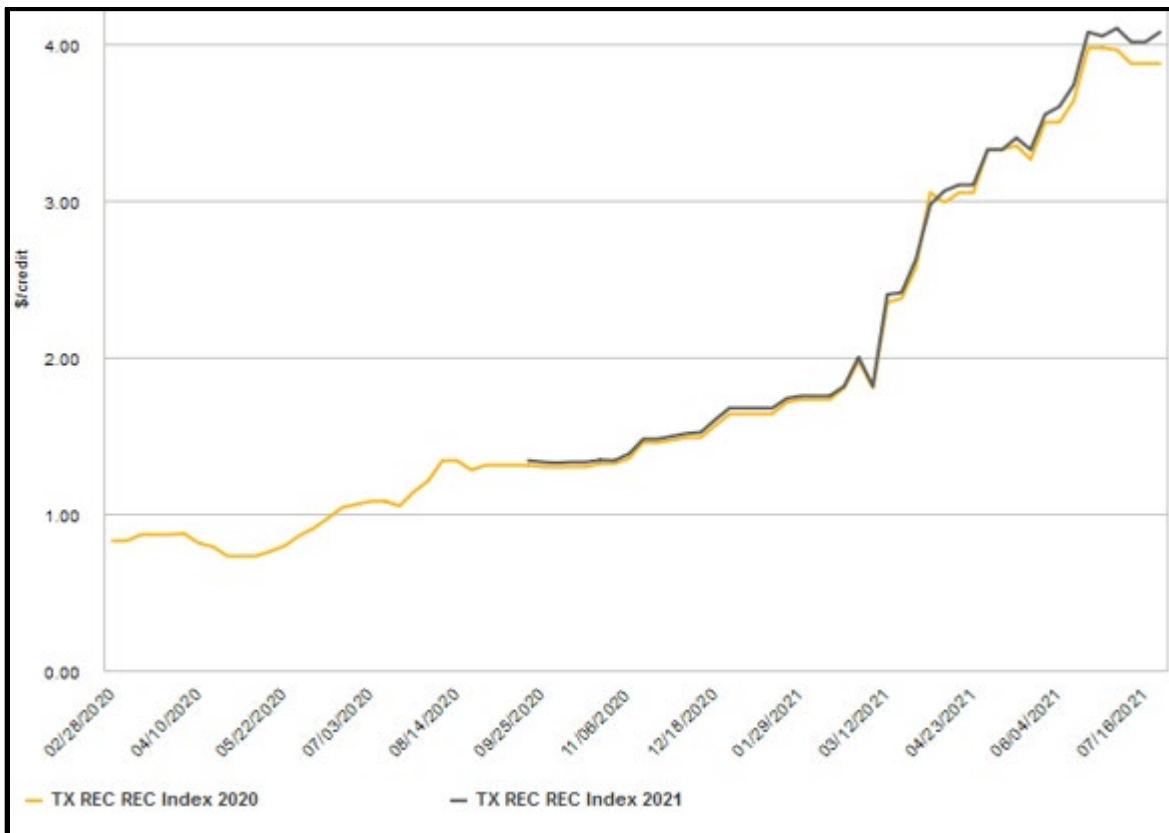
²⁵ Heeter, J. (2021) Status and Trends in the Voluntary Market (2020 data) Renewable Energy Markets Conference. NREL. <https://www.nrel.gov/docs/fy22osti/81141.pdf>

²⁶ The fact that Ameren Missouri, Evergy's east-side neighbor had to buy RECs this past year to meet RES compliance further supports Staff's position that Evergy management wasn't operating in its customers' best interest.

1 **Q. Do you agree with the disallowance Staff recommends for Evergy not selling excess**
2 **RECs?**

3 A. I do. It is arguably a bit on the high side based on the NREL information I just cited and
4 data I was able to locate over the Texas REC market during roughly the same prudence
5 period as shown in Figure 2.

6 Figure 2: S&P Capital IQ: Texas Renewable Energy Credits (REC) Index 2020-2021



8 It's important to note that every REC left to expire represents real tangible financial losses
9 to Evergy's customers in the form of lower FAC costs and real value destroyed for Evergy
10 shareholders.

1 **Q. How is real value destroyed for Evergy's shareholders?**

2 A. JD Power scores routinely show that the single-most important factor contributing to
3 customer's perception of its utility is the affordability of the electric service. Evergy has
4 generally scored poorly on JD Power scores, and Metro has some of the largest bills in the
5 state.²⁷ The influx of regulatory filings currently in-front of this Commission, including, but
6 not limited to, excess fuel costs related to Storm Uri and its rate case will no doubt result in
7 further cost increases to customers who are already struggling.²⁸

8 Failing to take advantage of obvious opportunities to minimize expense costs will
9 necessarily impact the ability to increase capital costs. That impacts shareholders bottom
10 line. It should also not be lost on this Commission that litigating repeated regulatory filings
11 over management's inaction is not good for shareholders either. But this is where we are at
12 with Evergy.

13 **Q. What else should the Commission consider regarding the prudence of Evergy's**
14 **management of its RECs?**

15 A. It is obvious that Evergy has continued to leave money on the table, what is less obvious is
16 that Evergy's current practice of retiring some RECs and using other RECs for RES
17 compliance is also flawed. The Commission should be aware that RECs lose their monetary
18 value over time, with REC valuation at its highest after it has been certified. Moving
19 forward, I recommend the Commission order Evergy to prioritize the sale and retirement of
20 its RECs by the date the REC is issued. That is, it should use its oldest RECs for RES
21 compliance purposes and seek to sell its newer RECs to maximize benefits.

²⁷ Evergy West will likely not be that far behind Metro's high costs if West is allowed full recovery of Winter Storm Uri costs it is seeking through securitization.

²⁸ For example, Moody's reports that inflation is costing US households an extra \$341 a month. See also <https://www.cnbc.com/2022/05/12/whats-more-expensive-as-inflation-costs-families-extra-341-a-month-.html>

1 **Q. Do you have any final comments to make?**

2 A. Unrelated to the issue of RECs, each of the filed testimonies in this docket briefly spoke
3 about Evergy's "economic" Power Purchase Agreements on past wind farms. This issue
4 was also addressed in the last contested FAC review in which OPC witness Lena Mantle
5 argued for a cost disallowance over two wind PPAs that were entered into for "economic
6 reasons" during that review period. Far from being economic, the PPAs resulted in millions
7 of unnecessary costs to ratepayers by never being profitable. The Commission ruled against
8 the OPC on this issue with the Report and Order stating:

9 OPC's argument, on the other hand, that the PPAs were not needed when acquired
10 to meet Missouri RES requirements or customers' needs and that values declining
11 before the PPA acquisition continued to decline afterwards, presupposes the PPAs
12 were acquired as only short-term investments. The Commission will not replace the
13 companies' primary supposition at the point of decision that the PPAs were being
14 acquired in the context of a long term, twenty-year investment with a supposition
15 that the investment was short term, and then apply a hindsight test and pronounce
16 the investments imprudent.²⁹

17 Three additional years have now passed since that order was released as the short-term
18 continues to extend towards the long term. As an update, Evergy West and Metro have now
19 cost ratepayers a combined \$466,308,892 in losses through fuel adjustment charges since
20 2014 due to unprofitable Evergy's Power Purchase Agreements ("PPA") in wind energy.
21 That is, ratepayers are paying SPP to take the power produced from these units. The
22 revenues, approaching a historical level of a half a billion dollars to date, continue to be
23 negative.

24 **Q. Does that conclude your testimony?**

25 A. Yes.

²⁹ Case No. EO-2019-0067 Report and Order p. 26.

CASE PARTICPATION OF
GEOFF MARKE, PH.D.

Company Name	Employed Agency	Case Number	Issues
Evergy Missouri West & Evergy Missouri Metro	Office of Public Counsel (OPC)	EO-2022-0064 EO-2022-0065	Surrebuttal: Renewable Energy Credits
Evergy Missouri West & Evergy Missouri Metro	OPC	ER-2022-0130 ER-2022-0129	Direct: Management Actions, Sibley Power Plant, Automated Metering Infrastructure, Clean Charge Network, Plant-In-Service Accounting, Low-Income Programs and Late Fees
Empire District Electric Company d/b/a Liberty	OPC	EO-2022-0040	Rebuttal: Stranded Asset: Asbury Power Plant, Securitized Utility Tariff Charge Surrebuttal: Stranded Asset: Asbury Power Plant
Empire District Gas Company d/b/a Liberty	OPC	GR-2021-0320	Direct: Low-Income Programs and Late Fees
Empire District Electric Company d/b/a Liberty	OPC	EU-2021-0274	Rebuttal: Accounting Authority Order Storm Uri
Evergy Missouri West	OPC	EO-2022-0061	Rebuttal: Special High Load Factor Market Rate for a Data Center Facility
Empire District Electric Company d/b/a Liberty	OPC	ER-2021-0312	Direct: Cost and Quality of Service, Stranded Asset, Customer Savings Plan, AMI, Low-Income Recommendations, Late Fees, Data Privacy & Green Button Rebuttal: Customer Experience, Stranded Assets, T&D Investments, CCOS, Rate Design Surrebuttal: Stranded Asset, Wind Investments, Resource Adequacy, Peer Ranking, Billing, Community Involvement, Low Income Programs, Late Fees, Data Access, PISA
Empire District Electric Company /Evergy Metro / Evergy West /Union Electric Company d/b/a Ameren Missouri	OPC	EO-2022-0057 EO-2022-0056 EO-2022-0055 EO-2022-0054	Memo: "Economic" Generation / Additive Manufacturing / Urban Heat Island
Evergy Missouri West & Evergy Missouri Metro	OPC	EO-2021-0349 EO-2021-0350	Memo: TOU Rate Design Report Evergy Missouri West & Evergy Missouri Metro Comments
Union Electric Company d/b/a Ameren Missouri	OPC	GR-2021-0241	Direct: AMI, PAYS, Late Fees, Low-Income Recommendations Rebuttal: COVID-19 Response, Customer Affordability, Residential Rate Design, Decoupling Tracker, 12M Aluminum Smelter

			Rate, Class Cost of Services Studies, Low-Income Programs, Community Solar, Green Button Surrebuttal: High Prairie Wind Farm, PISA, Voltage Optimization, Rate Design, CCOS, Advertising, Low-Income Programs, Late Fees
Union Electric Company d/b/a Ameren Missouri	OPC	ER-2021-0240	Direct: Wind Farm (High Prairie), Plant-In-Service-Accounting, Cryptocurrency, Advertising, EEI Dues, Keeping Current, Late Fees
Working Case: FERC 2222 Regarding Participation of DER Aggregators into the RTOs	OPC	EW-2021-0267	Memo: Aggregators of Retail Customers (ARCs) for Commercial & Industrial Demand Response
Evergny Missouri West & Evergny Missouri Metro	OPC	ET-2021-0151	Rebuttal: EV subsidies and EV charging stations Surrebuttal: Response to ChargePoint
Spire Missouri Inc.	OPC	GR-2021-0108	Direct: AMI, Corporate Governance: Workplace Discrimination Rebuttal: Subsidized Natural Gas Expansion / Multi-Family Pilot / Energy Efficiency / Rate Design / Low-Income Programs Surrebuttal: AMI / AMI Opt-Out / Corporate Governance: Workplace Discrimination / Propane Storage / Research and Development / Bad Debt & Uncollectable / Rate Design
Empire District Electric Company /Kansas City Power & Light & KCP&L Greater Missouri Operations Company/Union Electric Company d/b/a Ameren Missouri	OPC	EO-2021-0069 EO-2021-0068 EO-2021-0067 EO-2021-0066	Memorandum: Impact of falling energy market prices in SPP(Metro, West, and Empire specific) / Reliable Power / Additive Manufacturing (“AM” or 3D Printing”) / Virtual Power Plants / Small Modular Reactors / Combustion Turbine Conversion to Combined Cycle Units / Grain Belt Express Energy / Long Duration Storage Memorandum: Response to Sierra Club’s Evergny Metro and West Recommendations Memorandum: Response to Sierra Club and NRDC’s Ameren Missouri Recommendations
Missouri American Water	OPC	WR-2020-0344	Direct: COVID-19 / Future Test Year/ Cost Allocation Manual and Affiliate Transaction Rules for Large Water Utilities Direct: Rate Design Surrebuttal: Policy / Future Test Year / Affiliate Transactions Rule / Consolidated

			Tariff Pricing / Rate Design / Lead Line Replacement
Evergy Missouri West & Evergy Missouri Metro	OPC	EO-2020-0227	Rebuttal: Inefficient Management / Residential Demand Response Surrebuttal: Demand Response Programs
Working Case: To consider best practices for recovery of past-due utility customer payments after the COVID-19 pandemic	OPC	AW-2020-0356	Memorandum: Response to Staff Report on COVID-19 Past-Due Utility Customer Payments
Spire Missouri Inc.	OPC	GO-2020-0416	Memorandum: Notice of prudence concerns regarding natural gas Advanced Metering Infrastructure (“AMI”) investment
Evergy Missouri West & Evergy Missouri Metro	OPC	EU-2020-0350	Rebuttal: Authorized Accounting Order for: Lost Revenues / COVID-19 Expenses / Bad Debt Expense Surrebuttal: Disconnection Moratorium / Arrearage Management Plans / Economic Relief Pilot Program / Outreach / Energy Efficiency / Administrative Procedures
Empire District Electric Company	OPC	EO-2020-0284	Memorandum: Customer Savings Plan / Stateline Combined Cycle Upgrade / DSM / COVID-19 Impact on Modeling / Executive Order on Securing the US Bulk-Power System / SPP Effective Load Carrying Capability / All-Source RFP
Evergy Missouri West	OPC	EO-2020-0281	Memorandum: Wind Power PPAs / DSM / COVID-19 Impact on Modeling / Executive Order on Securing the US Bulk-Power System / SPP Effective Load Carrying Capability / Utility-Scale Solar / All-Source RFP
Evergy Missouri Metro	OPC	EO-2020-0280	Memorandum: Wind Power PPAs / DSM / COVID-19 Impact on Modeling / Executive Order on Securing the US Bulk-Power System / SPP Effective Load Carrying Capability / Utility-Scale Solar / All-Source RFP
Empire District Electric Company	OPC	ER-2019-0374	Direct: Cost and Quality of Service, Stranded Asset, AMI/CIS deployment Rebuttal: Customer Experience / Weather Normalization Rider / Energy Efficiency / Low-Income Pilot Program Rebuttal: Class Cost of Service / Rate Design / Low Income Pilot Program

			Surrebuttal: Cost and Quality of Service / Reliability Metrics / Asbury Power Plant / Rate Design & CCOS / DSM Programs
Union Electric Company d/b/a Ameren Missouri	OPC	EA-2019-0371	Rebuttal: Solar + Storage
Union Electric Company d/b/a Ameren Missouri	OPC	ER-2019-0335	Direct: Keeping Current Bill Assistance Program Rebuttal: Smart Energy Plan, Keeping Current, Coal Power Plants, CCOS, Rate Design, Pure Power RECs Surrebuttal: Coal Power Plants
Rule Making	OPC	AW-2020-0148	Memorandum: Residential Customer Disconnections and Data Standardization Presentation: Service Disconnection Data Standardization Virtual Rulemaking Workshop
Empire District Electric Company /Kansas City Power & Light & KCP&L Greater Missouri Operations Company/Union Electric Company d/b/a Ameren Missouri	OPC	EO-2020-0047 EO-2020-0046 EO-2020-0045 EO-2020-0044	Memorandum: Additive Manufacturing, Cement Block Battery Storage, Virtual Power Plant, Customer-Side Renewable Generation, Historical Review of energy forecasts (KCPL, GMO and Empire-Specific) and Rush Island and Labadie Power Plant Environmental Retrofits (Ameren specific)
Union Electric Company d/b/a Ameren Missouri	OPC	EA-2019-0309	Rebuttal: Need for the Wind Project/ Economic Valuation / Pre-Site Energy Assessment Omissions
KCP&L Greater Missouri Operations Company & Kansas City Power and Light Company	OPC	EO-2019-0132	Rebuttal: Response to KCPL's MEEIA application, Equitable Energy Efficiency Baseline, WattTime: Automated Emissions Reduction, PAYS, Urban Heat Island Mitigation Surrebuttal: Market Potential Study, Single Family Low-Income
KCP&L Greater Missouri Operations Company	OPC	EC-2019-0200	Surrebuttal: Deferral Accounting and Stranded Assets
Union Electric Company d/b/a Ameren Missouri	OPC	ED-2019-0309	Memorandum: on the "Aluminum Smelter Rate"
Empire District Electric Company	OPC	EO-2019-0046	Memorandum: Response to The Empire District Electric Company d/b/a Liberty Plant In Service Accounting (PISA) Report
KCP&L Greater Missouri Operations Company	OPC	EO-2019-0067	Rebuttal: Renewable Energy Credits
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2019-0314	Memorandum: Notice of Deficiency to Annual IRP Update
Rule Making	OPC	WX-2019-0380	Memorandum: on Affiliate Transaction Rules for Water Corporations

Working Case: Evaluate Potential Mechanisms for Facilitating Installation of Electric Vehicle Charging Stations	OPC	EW-2019-0229	Memorandum: on Policy Surrounding Electric Vehicles and Electric Vehicle Charging Stations
Rule Making	OPC	EX-2019-0050	Memorandum on Solar Rebates and Low Income Customers
Union Electric Company d/b/a Ameren Missouri	OPC	GR-2019-0077	Direct: Billing Practices Rebuttal: Rate Design, Decoupling, Energy Efficiency, Weatherization, CHP
Empire District Electric Company	OPC	EA-2019-0010	Rebuttal: Levelized Cost of Energy, Wind in the Southwest Power Pool Surrebuttal: SPP Market Conditions, Property Taxes, Customer Protections
Empire District Electric Company /Kansas City Power & Light & KCP&L Greater Missouri Operations Company/Union Electric Company d/b/a Ameren Missouri	OPC	EO-2019-0066 EO-2019-0065 EO-2019-0064 EO-2019-0063	Memorandum: Additive Manufacturing and Cement Block Battery Storage (IRP: Special Contemporary Topics)
Working Case: Allocation of Solar Rebates from SB 564	OPC	EW-2019-0002	Memorandum on Solar Rebates and Low Income Customers
Rule Making Workshop	OPC	AW-2018-0393	Memorandum: Supplemental Response to Staff Questions pertaining to Rules Governing the Use of Customer Information
Union Electric Company d/b/a Ameren Missouri	OPC	ET-2018-0132	Rebuttal: Line Extension / Charge Ahead – Business Solutions / Charge Ahead – Electric Vehicle Infrastructure Supplemental Rebuttal: EV Adoption Performance Base Metric
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2018-0211	Rebuttal: MEEIA Cycle III Application Surrebuttal: Cost Effectiveness Tests / Equitable Energy Efficiency Baseline
Union Electric Company d/b/a Ameren Missouri	OPC	EA-2018-0202	Rebuttal: Renewable Energy Standard Rate Adjustment Mechanism/Conservation Surrebuttal: Endangered and Protected Species
Kansas City Power & Light & KCP&L Greater Missouri Operations Company	OPC	ER-2018-0145 ER-2018-0146	Direct: Smart Grid Data Privacy Protections Rebuttal: Clean Charge Network / Community Solar / Low Income Community Solar / PAYS/ Weatherization/Economic Relief Pilot Program/Economic Development Rider/Customer Information System and Billing

			<p>Rebuttal: TOU Rates / IBR Rates / Customer Charge / Restoration Charge</p> <p>Surrebuttal: KCPL-GMO Consolidation / Demand Response / Clean Charge Network / One CIS: Privacy, TOU Rates, Billing & Customer Experience</p>
Union Electric Company d/b/a Ameren Missouri	OPC	ET-2018-0063	Rebuttal: Green Tariff
Liberty Utilities	OPC	GR-2018-0013	Surrebuttal: Decoupling
Empire District Electric Company	OPC	EO-2018-0092	<p>Rebuttal: Overview of proposal/ MO PSC regulatory activity / Federal Regulatory Activity / SPP Activity and Modeling / Ancillary Considerations</p> <p>Surrebuttal Response to parties</p> <p>Affidavit in opposition to the non-unanimous stipulation and agreement</p>
Great Plains Energy Incorporated, Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company, and Westar Energy, Inc.	OPC	EM-2018-0012	Rebuttal: Merger Commitments and Conditions / Outstanding Concerns
Missouri American Water	OPC	WR-2017-0285	<p>Direct: Future Test Year/ Cost Allocation Manual and Affiliate Transaction Rules for Large Water Utilities / Lead Line Replacement</p> <p>Direct: Rate Design / Cost Allocation of Lead Line Replacement</p> <p>Rebuttal: Lead Line Replacement / Future Test Year/ Decoupling / Residential Usage / Public-Private Coordination</p> <p>Rebuttal: Rate Design</p> <p>Surrebuttal: Affiliate Transaction Rules / Decoupling / Inclining Block Rates / Future Test Year / Single Tariff Pricing / Lead Line Replacement</p>
Missouri Gas Energy / Laclede Gas Company	OPC	GR-2017-0216 GR-2017-0215	<p>Rebuttal: Decoupling / Rate Design / Customer Confidentiality / Line Extension in Unserved and Underserved Areas / Economic Development Rider & Special Contracts</p> <p>Surrebuttal: Pay for Performance / Alagasco & EnergySouth Savings / Decoupling / Rate Design / Energy Efficiency / Economic Development Rider: Combined Heat & Power</p>
Indian Hills Utility	OPC	WR-2017-0259	Direct: Rate Design

Rule Making	OPC	EW-2018-0078	Memorandum: Cogeneration and net metering - Disclaimer Language regarding rooftop solar
Empire District Electric Company	OPC	EO-2018-0048	Memorandum: Integrated Resource Planning: Special Contemporary Topics Comments
Kansas City Power & Light	OPC	EO-2018-0046	Memorandum: Integrated Resource Planning: Special Contemporary Topics Comments
KCP&L Greater Missouri Operations Company	OPC	EO-2018-0045	Memorandum: Integrated Resource Planning: Special Contemporary Topics Comments
Missouri American Water	OPC	WU-2017-0296	Direct: Lead line replacement pilot program Rebuttal: Lead line replacement pilot program Surrebuttal: Lead line replacement pilot program
KCP&L Greater Missouri Operations Company	OPC	EO-2017-0230	Memorandum on Integrated Resource Plan, preferred plan update
Working Case: Emerging Issues in Utility Regulation	OPC	EW-2017-0245	Memorandum on Emerging Issues in Utility Regulation / Presentation: Inclining Block Rate Design Considerations Presentation: Missouri Integrated Resource Planning: And the search for the “preferred plan.” Memorandum: Draft Rule 4 CSR 240-22.055 DER Resource Planning
Rule Making	OPC	EX-2016-0334	Memorandum on Missouri Energy Efficiency Investment Act Rule Revisions
Great Plains Energy Incorporated, Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company, and Westar Energy, Inc.	OPC	EE-2017-0113 / EM-2017-0226	Direct: Employment within Missouri / Independent Third Party Management Audits / Corporate Social Responsibility
Union Electric Company d/b/a Ameren Missouri	OPC	ET-2016-0246	Rebuttal: EV Charging Station Policy Surrebuttal: EV Charging Station Policy
Kansas City Power & Light		ER-2016-0285	Direct: Consumer Disclaimer Direct: Response to Commission Directed Questions Rebuttal: Customer Experience / Greenwood Solar Facility / Dues and Donations / Electric Vehicle Charging Stations Rebuttal: Class Cost of Service / Rate Design

			Surrebuttal: Clean Charge Network / Economic Relief Pilot Program / EEI Dues / EPRI Dues
Union Electric Company d/b/a Ameren Missouri	OPC	ER-2016-0179	Direct: Consumer Disclaimer / Transparent Billing Practices / MEEIA Low-Income Exemption Direct: Rate Design Rebuttal: Low-Income Programs / Advertising / EEI Dues Rebuttal: Grid-Access Charge / Inclining Block Rates /Economic Development Riders
KCP&L Greater Missouri Operations Company	OPC	ER-2016-0156	Direct: Consumer Disclaimer Rebuttal: Regulatory Policy / Customer Experience / Historical & Projected Customer Usage / Rate Design / Low-Income Programs Surrebuttal: Rate Design / MEEIA Annualization / Customer Disclaimer / Greenwood Solar Facility / RESRAM / Low-Income Programs
Empire District Electric Company, Empire District Gas Company, Liberty Utilities (Central) Company, Liberty Sub-Corp.	OPC	EM-2016-0213	Rebuttal: Response to Merger Impact Surrebuttal: Resource Portfolio / Transition Plan
Working Case: Polices to Improve Electric Regulation	OPC	EW-2016-0313	Memorandum on Performance-Based and Formula Rate Design
Working Case: Electric Vehicle Charging Facilities	OPC	EW-2016-0123	Memorandum on Policy Considerations of EV stations in rate base
Empire District Electric Company	OPC	ER-2016-0023	Rebuttal: Rate Design, Demand-Side Management, Low-Income Weatherization Surrebuttal: Demand-Side Management, Low-Income Weatherization, Monthly Bill Average
Missouri American Water	OPC	WR-2015-0301	Direct: Consolidated Tariff Pricing / Rate Design Study Rebuttal: District Consolidation/Rate Design/Residential Usage/Decoupling Rebuttal: Demand-Side Management (DSM)/ Supply-Side Management (SSM) Surrebuttal: District Consolidation/Decoupling

			Mechanism/Residential Usage/SSM/DSM/Special Contracts
Working Case: Decoupling Mechanism	OPC	AW-2015-0282	Memorandum: Response to Comments
Rule Making	OPC	EW-2015-0105	Missouri Energy Efficiency Investment Act Rule Revisions, Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0084	Triennial Integrated Resource Planning Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0055	Rebuttal: Demand-Side Investment Mechanism / MEEIA Cycle II Application Surrebuttal: Potential Study / Overearnings / Program Design Supplemental Direct: Third-party mediator (Delphi Panel) / Performance Incentive Supplemental Rebuttal: Select Differences between Stipulations Rebuttal: Pre-Pay Billing
The Empire District Electric Company	OPC	EO-2015-0042	Integrated Resource Planning: Special Contemporary Topics Comments
KCP&L Greater Missouri Operations Company	OPC	EO-2015-0041	Integrated Resource Planning: Special Contemporary Topics Comments
Kansas City Power & Light	OPC	EO-2015-0040	Integrated Resource Planning: Special Contemporary Topics Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0039	Integrated Resource Planning: Special Contemporary Topics Comments
Kansas City Power & Light	OPC	ER-2014-0370	Direct (Revenue Requirement): Solar Rebates Rebuttal: Rate Design / Low-Income Weatherization / Solar Rebates Surrebuttal: Economic Considerations / Rate Design / Cyber Security Tracker
Rule Making	OPC	EX-2014-0352	Memorandum Net Metering and Renewable Energy Standard Rule Revisions,
The Empire District Electric Company	OPC	ER-2014-0351	Rebuttal: Rate Design/Energy Efficiency and Low-Income Considerations
Rule Making	OPC	AW-2014-0329	Utility Pay Stations and Loan Companies, Rule Drafting, Comments
Union Electric Company d/b/a Ameren Missouri	OPC	ER-2014-0258	Direct: Rate Design/Cost of Service Study/Economic Development Rider Rebuttal: Rate Design/ Cost of Service/ Low Income Considerations Surrebuttal: Rate Design/ Cost-of-Service/ Economic Development Rider
KCP&L Greater Missouri Operations Company	OPC	EO-2014-0189	Rebuttal: Sufficiency of Filing Surrebuttal: Sufficiency of Filing

KCP&L Greater Missouri Operations Company	OPC	EO-2014-0151	Renewable Energy Standard Rate Adjustment Mechanism (RESRAM) Comments
Liberty Natural Gas	OPC	GR-2014-0152	Surrebuttal: Energy Efficiency
Summit Natural Gas	OPC	GR-2014-0086	Rebuttal: Energy Efficiency Surrebuttal: Energy Efficiency
Union Electric Company d/b/a Ameren Missouri	OPC	ER-2012-0142	Direct: PY2013 EM&V results / Rebound Effect Rebuttal: PY2013 EM&V results Surrebuttal: PY2013 EM&V results Direct: Cycle I Performance Incentive Rebuttal: Cycle I Performance Incentive
Kansas City Power & Light	Missouri Public Service Commission Staff	EO-2014-0095	Rebuttal: MEEIA Cycle I Application testimony adopted
KCP&L Greater Missouri Operations Company	Missouri Division of Energy (DE)	EO-2014-0065	Integrated Resource Planning: Special Contemporary Topics Comments
Kansas City Power & Light	DE	EO-2014-0064	Integrated Resource Planning: Special Contemporary Topics Comments
The Empire District Electric Company	DE	EO-2014-0063	Integrated Resource Planning: Special Contemporary Topics Comments
Union Electric Company d/b/a Ameren Missouri	DE	EO-2014-0062	Integrated Resource Planning: Special Contemporary Topics Comments
The Empire District Electric Company	DE	EO-2013-0547	Triennial Integrated Resource Planning Comments
Working Case: State-Wide Advisory Collaborative	OPC	EW-2013-0519	Presentation: Does Better Information Lead to Better Choices? Evidence from Energy-Efficiency Labels Presentation: Customer Education & Demand-Side Management Presentation: MEEIA: Strengths, Weaknesses, Opportunities and Threats (SWOT) Analysis
Independence-Missouri	OPC	Indy Energy Forum 2014	Presentation: Energy Efficiency
Independence-Missouri	OPC	Indy Energy Forum2015	Presentation: Rate Design
NARUC – 2017 Winter, Washington D.C.	OPC	Committee on Consumer Affairs	Presentation: PAYS Tariff On-Bill Financing
NASUCA – 2017 Mid-Year, Denver	OPC	Committee on Water Regulation	Presentation: Regulatory Issues Related to Lead-Line Replacement of Water Systems
NASUCA – 2017 Annual Baltimore,	OPC	Committee on Utility Accounting	Presentation: Lead Line Replacement Accounting and Cost Allocation
NARUC – 2018 Annual, Orlando	OPC	Committee on Consumer Affairs	Presentation: PAYS Tariff On-Bill Financing Opportunities & Challenges

Critical Consumer Issues Forum (CCIF)—New Orleans	OPC	Examining Polices for Delivering Smart Mobility	Presentation: Missouri EV Charging Station Policy in 4 Acts: Missouri Office of the Public Counsel Perspective
Michigan State, Institute of Public Utilities, 2019	OPC	Camp NARUC: Fundamentals	Presentation: Revenue Requirement
NARUC/US AID, Republic of North Macedonia, Skopje 2019	OPC	NARUC /US AID: Cybersecurity	Presentation: Case Study: The Missouri Experience, Cybersecurity and Data Privacy
Kansas, Clean Energy Business Council (“CEBC”), 2020	OPC	Climate and Energy Project	Presentation: PAYS ® (“Pay As You Save”) or: How I learned to Stop Worrying and Love DSM
Michigan State, Institute of Public Utilities, 2020	OPC	Camp NARUC: Fundamentals	Presentation: Fundamentals of Economic Regulation / Performance Base Regulation
Renew Missouri	OPC	MoBar Continued Learning Education Credit	Presentation: Regulatory Incentives and Utility Performance
Missouri Bar Association	OPC	MoBar Fall Environmental & Energy Law Committee	Presentation: The Virus, The Economy and Regulated Utility Service: An Overview of Utilities and Stakeholders Response to COVID-19 and the Recession to Date
University of Missouri and City of Columbia, MO., 2021	OPC	Advancing Renewables in the Midwest	Presentation: The Heat Is On: Demand Side Management of Urban Heat Islands
NARUC/US AID, Indonesia, Jakarta 2021	OPC	Indonesia Ministry of Energy and Mineral Resources (MEMR)	Presentation: Introduction to Tariff Setting & Review: Utility Revenue Requirement, Cost Allocation & Rate Design
Michigan State, Institute of Public Utilities, 2021	OPC	Camp NARUC: Fundamentals	Presentation: Fundamentals of Economic Regulation
National Community Action Partnership	OPC	2022 Management Leadership & Training Conference	Presentation: Maximizing Weatherization Funds in Public Utility Commission Proceedings
Rocky Mountain Institute 2022	OPC	E-Accelerator Electricity Innovation Lab (Champion)	Presentation: Project Voltron (First Statewide Inclusive Utility Investment Program)
The American Council for an Energy-Efficient Economy (ACEEE) White Plains, New York	OPC	2022 Energy Efficiency Finance Forum	Presentation: PAYS (“Pays As You Save”) Or: How I Learned to Stop Worrying and Love DSM
Missouri State Emergency Management Association (“SEMA”), 2022	OPC	2 nd Annual Virtual Resiliency Summit	Presentation: It’s Not Always Sunny on the Grid: Overview of Challenges Faced and Resilient Actions Taken to Keep the Lights On