

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

In the Matter of Every Missouri Metro and )  
Every Missouri West’s Notice of Intent to )  
File Applications for Authority to Establish a ) **File No. EO-2019-0132**  
Demand-Side Programs Investment Mechanism )

**STAFF’S RESPONSE TO COMMISSION ORDER**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and for its *Staff’s Response to Commission Order* states as follows:

1. On March 11, 2020, in its *Amended Report and Order*, the Commission approved Everygy Metro Inc. d/b/a Everygy Missouri Metro (“Everygy Metro”) and Everygy Missouri West, Inc. d/b/a Everygy Missouri West’s (“Everygy West”) (collectively, “Everygy”) Missouri Energy Efficiency Investment Act (MEEIA) application. Everygy’s MEEIA Cycle 3 includes following annual Evaluation, Measurement, and Verification (EM&V) timeline for program year 2020 (“PY2020”): Everygy’s third party independent evaluator(s)<sup>1</sup> shall file its final EM&V report by June 30, 2021, the Commission Auditor<sup>2</sup> shall file its report by July 14, 2021, and stakeholders must file any change requests by July 28, 2021.
2. Due to miscommunication with an independent evaluator, Everygy’s final residential and demand response EM&V reports were not received until July 2, 2021. Parties agreed to move the due date for the Commission Auditor’s report to July 19, 2021, and stakeholder’s change requests due date to July 30, 2021. It was not until July 26, 2021 that all final PY2020 EM&V reports were filed in EFIS.

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<sup>1</sup> For PY2020, Everygy’s third-party independent evaluators are Guidehouse and ADM.

<sup>2</sup> Evergreen Economics.

3. The Independent EM&V Audit of the Evergy PY2020 Program Evaluations, filed by Evergreen Economics on July 19, 2021, listed two issues with Evergy's PY2020 EM&V reports. Evergreen Economics takes issue with Guidehouse's coding of certain free ridership questions and ADM's use of a single survey question as the sole determinant of the final free ridership value. Evergreen Economics also takes issue with ADM's modeling of the residential and business smart thermostat programs.
4. Staff did not file a change request to address these issues, and does not believe at this moment any further filings are necessary, however Staff agrees the issues raised by Evergreen Economics are valid concerns that should be discussed by the stakeholders for purposes of program year 2021. Staff recommends that Evergy schedule at least one meeting, to take place prior to October 31, 2021, for the stakeholders to discuss the issues raised by Evergreen Economics in its report and how to address those issues for future program years.

**WHEREFORE** Staff prays that the Commission orders the stakeholders to meet and discuss any outstanding issues with the PY2020 EM&V reports as well as how to address the issues going forward.

Respectfully submitted,

**/s/ Nicole Mers**

Nicole Mers

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**/s/ Travis Pringle**

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Attorneys for the Staff of the  
Missouri Public Service Commission

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and/or counsel of record on this 6<sup>th</sup> day of August, 2021.

**/s/ Nicole Mers**