Exhibit No.:	
Issue(s):	*Rate Base, Plant In Service*
Witness:	*Claire M. Eubanks, PE*
Sponsoring Party:	*MoPSC Staff*
Type of Exhibit:	*Rebuttal Testimony*
Case Nos.:	*ER-2022-0129 and ER-2022-0130*
Date Testimony Prepared:	*July 13, 2022*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENGINEERING ANALYSIS DEPARTMENT

REBUTTAL TESTIMONY

OF

CLAIRE M. EUBANKS, PE

Evergy Metro, Inc. d/b/a Evergy Missouri Metro
Case No. ER-2022-0129

Evergy Missouri West, Inc. d/b/a Evergy Missouri West
Case No. ER-2022-0130

Jefferson City, Missouri
July 2022

****** Denotes Confidential Information ******

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OF

REBUTTAL TESTIMONY OF

CLAIRE M. EUBANKS, PE

Evergy Metro, Inc. d/b/a Evergy Missouri Metro
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Evergy Missouri West, Inc. d/b/a Evergy Missouri West
Case No. ER-2022-0130

REBUTTAL TESTIMONY

OF

CLAIRE M. EUBANKS, PE

Evergy Metro, Inc. d/b/a Evergy Missouri Metro
Case No. ER-2022-0129

Evergy Missouri West, Inc. d/b/a Evergy Missouri West
Case No. ER-2022-0130

Q. Please state your name and business address.

A. Claire M. Eubanks and my business address is Missouri Public Service Commission, P.O. Box 360, Jefferson City, Missouri, 65102.

Q. By whom are you employed and in what capacity?

A. I am employed by the Missouri Public Service Commission ("Commission") as the Manager of the Engineering Analysis Department, Industry Analysis Department, Commission Staff Division.

Q. Are you the same Claire M. Eubanks who filed Direct Testimony on June 8, 2022 in this case?

A. Yes.

EXECUTIVE SUMMARY

Q. What is the purpose of your rebuttal testimony?

A. I am responding to the Direct Testimony of Company witness Mr. Brad Lutz and the Direct Testimony of Office of Public Counsel ("OPC") witness Dr. Geoff Marke regarding Advanced Metering Infrastructure ("AMI"); the Direct Testimony of Company witness Mr. Bruce Akin on system reliability and investment; and the Direct Testimony of

OPC witness Dr. Marke on his recommendation to order Evergy Missouri Metro and Evergy Missouri West to provide a quantitative evaluation of the costs and benefits of its Plant-in-service- accounting ("PISA") projects. Finally, I am responding to the Company's proposed tariffs related to the Emergency Energy Conservation Plan tariff, net metering, and Distributed Energy Resource ("DER") interconnection terms and conditions.

ADVANCED METERING INFRASTRUCTURE

Q. What is Advanced Metering Infrastructure?

A. AMI is an integrated system of smart meters, communication networks, and data management systems that enables two-way communication between utilities and customers.[1]

Q. What is a smart meter?

A. An electric smart meter, or an AMI meter, is a device that measures and records electricity usage hourly or sub-hourly. Depending on the manufacturer and model of the AMI meter, other capabilities may be available such as monitoring the on/off status of electric service, measuring voltage, and remotely disconnecting and reconnecting electric service.

Q. Did the Company discuss AMI in its Direct Testimony?

A. Yes. The Direct Testimony of Brad Lutz generally describes the benefits identified in the 2014 business case for moving from Automatic Meter Reading ("AMR") to AMI meters. Mr. Lutz also generally describes benefits of AMI meters, when coupled with

[1] *Advanced Metering Infrastructure and Customer Systems*, U.S. Department of Energy, September 2016.

other technologies. Mr. Lutz also presents an Itron[2] study on the use of AMI meters for load analysis. The benefits that he mentions include:

- Enhanced revenue protection
- Load Analysis
- Weather normalization
- Forecasting
- Outage communication
- Reduced truck rolls
- Reconnection
- Energy Education
- Employee safety
- End use disaggregation
- Power quality

Q. Did Evergy attempt to quantify the above-listed benefits?

A. No. In fact, Evergy asserts "[t]here is not a way of quantifying the financial value of customer value adds such as quicker outage notifications and restorations." Schedule CME-r1 includes the response to Staff Data Request No. 0284 in ER-2022-0129 and Staff Data Request No. 0297 in ER-2022-0130.

Q. Does Staff agree?

A. No. In fact, Company Witness Bruce Akin provides a study by UMS group[3] on Evergy's Grid Modernization plan that purports to quantify the financial value of avoided customer outages.[4]

[2] Evergy contracted Itron as an external consultant to review Evergy's AMI aggregation process and Evergy's load aggregation results.
[3] Evergy contracted UMS Group as an external consultant to review Evergy's Electric Transmission and Distribution (T&D) 2020-2024 Grid Modernization Plan.
[4] Bruce Akin Direct Testimony page 20, lines 1-3.

Q. Are all of the benefits listed above applicable to the meters deployed by Evergy?

A. No. To realize the benefits of reduced truck rolls for example, Evergy would need to have AMI meters with capability of remotely disconnecting and reconnecting electric service (AMI-SD meters) and a waiver from the knock and collect rules contained in Chapter 13.

Q. Has the Company installed AMI-SD meters?

A. Not exclusively. EMM and EMW initially replaced AMR[5] meters with AMI meters in portions of its service territories from 2014 to 2016.[6] The AMI meters installed from 2014-2016 did not include the service disconnect capability. Evergy began replacing AMI meters with AMI-SD meters in late 2018. Initially, Evergy made these replacements when the AMI meter failed. In early 2020, Evergy began replacing AMI meters with AMI-SD meters even when the meter had not failed. Over the test year and update period, 99% of the meters exchanged were less than 7 years old while the design life for the model of AMI meter installed by the Company is over 20 years.

Q. Did the Company file direct testimony justifying the need to replace the relatively new AMI meters with AMI-SD meters?

A. No. Mr. Lutz mentions the initial business case for its 2014 deployment of AMI meters identified remote disconnect capabilities as a "driver or benefit to be gained from the conversion."[7] However, the Company did not install AMI-SD meters until 2018. Mr. Lutz

[5] Automated meter reading is a metering system that allows a utility representative to read the meter device from a handheld device or vehicle at a distance, such as the sidewalk, rather than having a manual meter reader record the number off the display screen.
[6] The Smart Grid Demonstration project included installation of AMI meters in 2010 and 2011, approximately 2.11% of its meter population (Surrebuttal Testimony of Geoff Marke, Schedule GM-6, ER-2018-0145).
[7] ER-2022-0129 and ER-2022-0130, Direct Testimony of Brad Lutz, page 36, lines 11-13.

also mentions disconnection/reconnection in his discussion of benefits but as mentioned previously Evergy claims these benefits are not quantifiable.

Q. What is Staff's recommendation on AMI meters?

A. In direct testimony Staff recommended that the Commission resolve the premature retirement of AMI meters issue by basing its awarded revenue requirement on a disallowance of ($3,641,734) and ($1,973,398) from Evergy Missouri Metro's ("EMM") and Evergy Missouri West's ("EMW") FERC Account 370.2, respectively.[8] Staff's recommended disallowance represents the exchanges made solely to gain the service disconnect capability and instances where Evergy was unable to provide a reason for the replacement.

Q. What did OPC recommend in its Direct case?

A. OPC witness Dr. Geoff Marke recommends the Commission disallow all costs related to all second generation AMI meters.[9]

Q. Why is Staff's position the most reasonable?

A. Fundamentally, Staff and OPC agree that it is not just and reasonable for Evergy to prematurely replace its AMI meters. Staff's recommended disallowance, however, acknowledges that Evergy, in some cases, has reasonably replaced meters which are no longer functioning.

[8] Evergy has provided additional detail on when it began to replace AMI meters with AMI-SD meters in response to Staff Data Request No. 0283.2 in ER-2022-0129 and 0296.2 in ER-2022-0130. Staff will provide an update in its True-up direct testimony.
[9] Direct Testimony of Dr. Geoff Marke, page 16, lines 7-8.

SYSTEM RELIABILITY

Q. Please define reliability.

A. Reliability is the ability of the electric system to supply power at all times and withstand sudden disturbances.

Q. How do utilities measure reliability performance?

A. Reliability metrics are used to assess the operational performance of the distribution system in terms of reliability. Commission rule 20 CSR 4240-23.010 establishes distribution reliability monitoring and reporting requirements for the investor owned electric utilities, often referred to as reliability metrics. These indices are affected by customer density, tree density, geography, observed weather, and other factors that may be beyond the control of the utilities.[10]

Q. Which reliability metrics are the utilities[11] required to report and what do the indices tell us about system reliability?

A. There are four metrics the electric utilities are required report per Chapter 23:

- System Average Interruption Frequency Index ("SAIFI"). SAIFI is a gauge for the frequency of interruptions.
- System Average Interruption Duration Index ("SAIDI"). SAIDI is a gauge for the duration of outages.
- Customer Average Interruption Frequency Index ("CAIFI"). CAIFI is a gauge for how frequently impacted customers are experiencing interruptions. CAIFI differs from SAIFI in that the index only includes customers who actually experience interruptions.

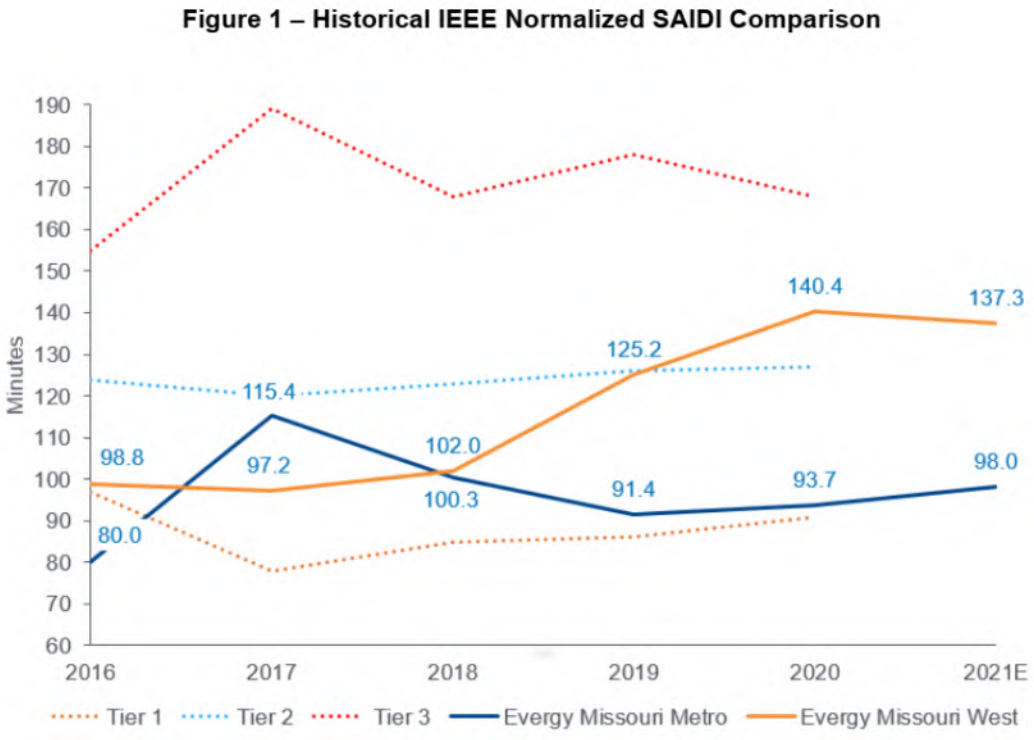
[10] 20 CSR 4240-23.010(11).
[11] Evergy also reports Momentary Average Interruption Frequency Index ("MAIFI) to Staff through a stipulation and agreement.

- Customer Average Interruption Duration Index ("CAIDI"). CAIDI describes the average time to restore service. This metric only includes customers who actually experience interruptions.

Q. How does Evergy represent its system is performing?

A. Company witness Bruce Akin asserts: "From a reliability metric perspective, Evergy and the companies that formed Evergy have a track record of solid performance. Figure 1 illustrates consistent reliability performance within Tier 2 of peer utilities based on System Average Interruption Duration Index ("SAIDI")."

Figure 1:



Q. What conclusions do you draw from the graph presented in Mr. Akin's Direct Testimony and provided above?

A. Based on the graph above, EMW's SAIDI metric has steadily and significantly deteriorated over recent years. Remember SAIDI is a gauge for the duration of outages. Improved response to outages is the most direct way to improve SAIDI.

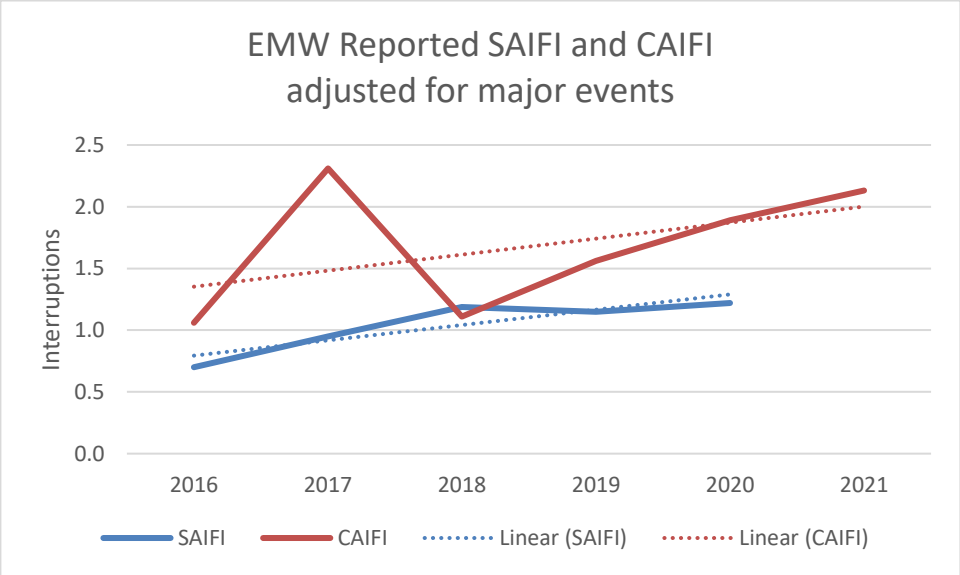
Q. Is the data presented in Mr. Akin's Direct Testimony consistent with the reliability metrics reported to the Commission?

A. No, the values are not consistent. However, the trend of poorer reliability performance is reflected in the annual reporting EMW provides to the Commission. At this time, Staff is unclear the source of data Mr. Akin used for his Direct Testimony or whether adjustments were made to benchmark to peer utilities.[12]

Q. In terms of the all reliability metrics, how is EMW performing?

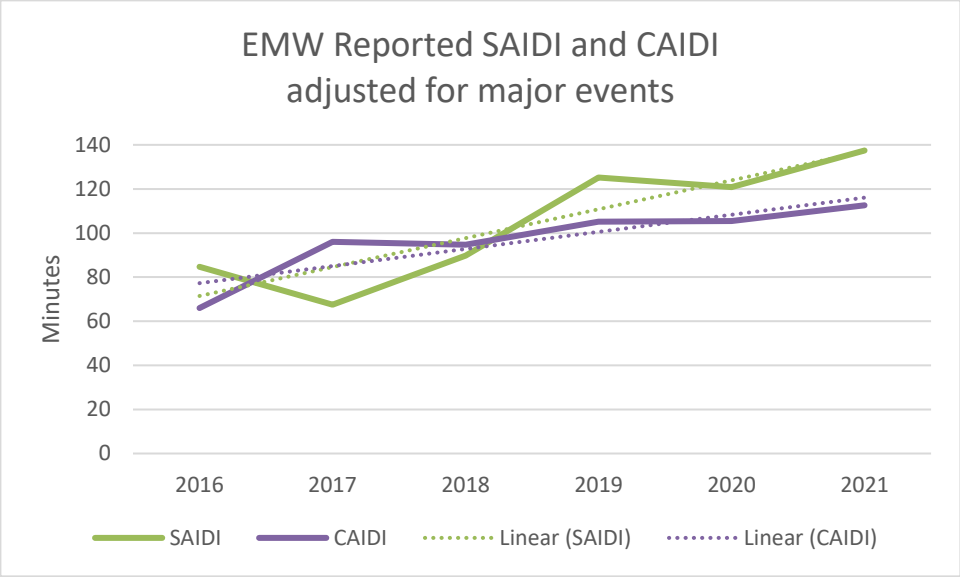
A. As shown in the graphs below all reported reliability metrics for EMW are trending toward poorer reliability performance.

Figure 2:



[12] Staff inquired about the discrepancy between the reliability metrics presented in Mr. Akin's Direct testimony as compared to the annual reporting in Data Request No. 0506 in ER-2022-0129 and Data Request No. 0499 in ER-2022-0130, both due on July 28, 2022.

Figure 3:



Q. In terms of all reported reliability metrics, how is EMM performing?

A. Although EMM generally has better reliability when compared to EMW, EMM's reliability metrics are also trending toward poorer reliability performance.

Figure 4:

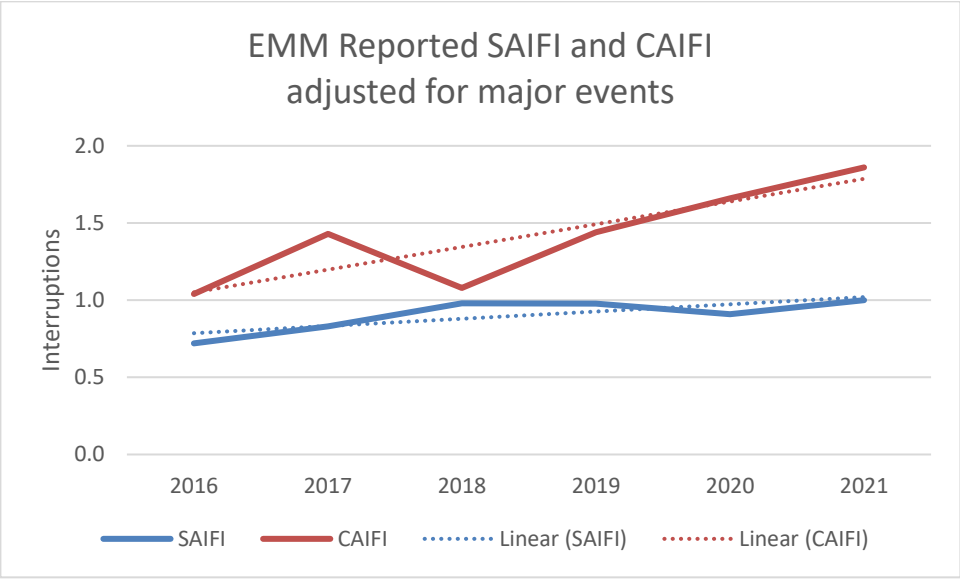
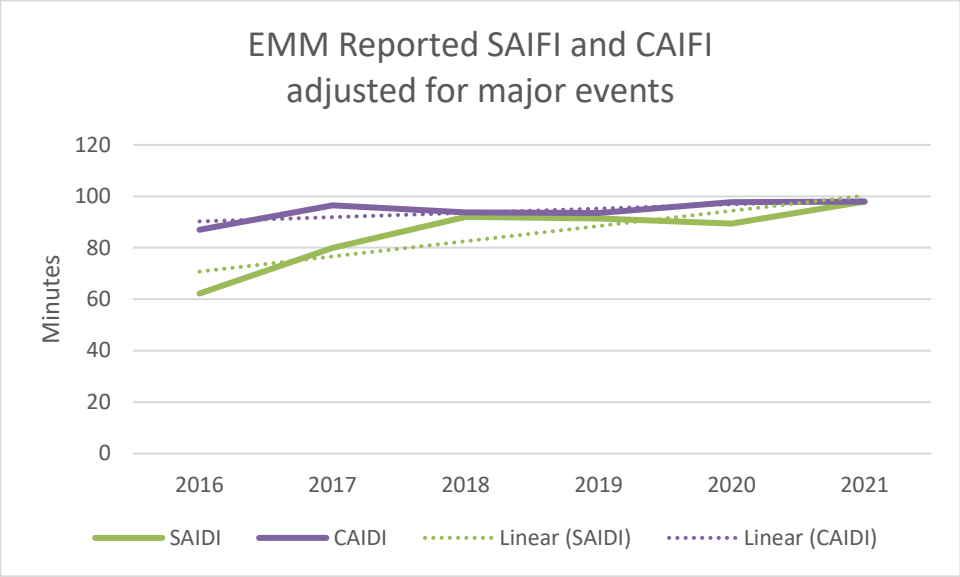


Figure 5:



Q. Are there other reliability metrics Evergy monitors and does not report to the Commission?

A. Yes. Evergy has a developed a program to improve a metric related to customers who experience multiple outages ("CEMI"). Customers who experience six or more sustained interruptions over a 12-month period.[13]

Q. Does Evergy plan to increase its transmission and distribution capital spending?

A. Yes. The Direct Testimony of Bruce Akin describes Evergy's programmatic system investment areas and explains Evergy prioritization of specific project investments, which do not fall under program spending. ** [redacted] ** [14]

[13] Direct Testimony of Bruce Akin, page 9, line 14-19.
[14] Schedule BA-1, *Review of the Electric Transmission and Distribution (T&D) 2020 – 2024 Grid Modernization Plan*, UMS Group, page 19. Note the 87% figure is for transmission and distribution capital investment across all

Q. In terms of the programmatic system investment areas, does the Commission require reporting on these types of programs?

A. Yes. Chapter 23 requires each electric utility to provide Staff a summary report detailing all programs scheduled for the upcoming calendar year designed to maintain or improve service reliability. The reports are required to include the status and funding of the programs.

Q. Has Evergy increased its planned spending on programmatic reliability programs?

A. ** [redacted] **

Evergy jurisdictions. As shown in table 1-11 Evergy's plan is to decrease transmission and distribution capital investment in the Kansas Metro area and increase investment in all other jurisdictions.

Additionally, while Evergy is required to report on its planned reliability budget there is no requirement to report actual investment made in these programs.

Q. Does Evergy represent that it considers reliability impact when prioritizing projects?

A. Yes. Evergy represents that it scores individual projects in various categories[15] including customer reliability. Factors that influence the customer reliability score include: Asset Criticality, Health and Risk, Power Quality Impacts, Risk of Potential Overload, and Availability of Contingency. Transmission projects also incorporate the benefits of relieving congestion.[16]

Q. Does Evergy retain the project scoring described above?

A. ** [redacted] **

Q. Does Evergy expect its transmission and distribution capital investment plan will improve reliability?

A. Yes, eventually. Importantly, Evergy does not expect improved reliability for two to three years after capital investments are made.[17] ** [redacted]

[15] Other categories include Public Impact, Employee Benefit, and Growth and Technology. Financial metrics are still being refined.
[16] Direct Testimony of Bruce Akin, page 16, lines 11-15.
[17] Direct Testimony of Bruce Akin, page 15, lines 11-13; page 19, lines 13-15.

[redacted][18] [redacted]

[redacted]

[redacted][19] [redacted]

[redacted]

[redacted]

Figure 6 and 7:

**

[redacted]

**

Figure 8 and 9:

**

[redacted]

**

[18] Schedule BA-1, *Review of the Electric Transmission and Distribution (T&D) 2020 – 2024 Grid Modernization Plan*, UMS Group, page 52.
[19] Schedule BA-1, *Review of the Electric Transmission and Distribution (T&D) 2020 – 2024 Grid Modernization Plan*, UMS Group, page 21.

** [redacted] ** However, as shown in Figures 2-5, Evergy's actual reliability performance has deteriorated in recent years.

Q. How did UMS group quantify benefits related to the capital investment plan?

A. ** [redacted] **

Q. Was Staff provided access to the ** [redacted] **?

A. No. However, Staff was provided an output file. See Confidential response to Staff Data Request No. 0416 in ER-2022-0129 and Staff Data Request No. 0421 in ER-2022-0130 attached as CME-r3.

Q. Please summarize the issue of reliability and transmission and distribution capital investment.

A. Evergy's distribution system reliability is deteriorating across all reliability metrics required to be reported per Chapter 23. ** [redacted] ** [20] Even with increased capital investment there is a 2-3 year lag in reliability performance, ** [redacted]

[20] Schedule BA-1, *Review of the Electric Transmission and Distribution (T&D) 2020 – 2024 Grid Modernization Plan*, UMS Group, page 53.

[redacted][21] ** Evergy's 2020-2024 Grid Modernization Plan calls for an ** [redacted]

[redacted]. **

Q. Does Staff have recommendations to improve the transparency of the Company's distribution system investment?

A. Yes. Staff recommends the Commission order Evergy to include in its February Capital Investment filings the SAIDI and SAIFI reductions expected through 2030 by project/program.

Q. What are Staff's recommendations related to reliability?

A. Staff recommends the Commission order Evergy to do the following:

- As a part of its reliability improvement program filing, provide the actual spend (per reliability program) from the previous year;
- Include in its next reliability improvement program filing, process improvements to improve CAIDI; and
- As a part of its annual reliability metric reporting, report CEMI (monthly values).

PLANT IN SERVICE ACCOUNTING

Q. What is Dr. Marke's recommendation regarding PISA cost-benefit analysis?

A. Dr. Marke recommends that the Commission order EMM and EMW to provide a quantitative evaluation of the cost and benefits of its PISA projects estimated to exceed $20 million. Dr. Marke's recommendation is consistent with a portion of Senate Bill 745 which was recently signed into law.

[21] Schedule BA-1, *Review of the Electric Transmission and Distribution (T&D) 2020 – 2024 Grid Modernization Plan*, UMS Group, page 52.

Q. Does Staff agree with Dr. Marke's recommendation?

A. Yes. As Dr. Marke noted, the Commission recently approved a stipulation and agreement in Ameren Missouri's most recent rate case that addressed cost-benefit analysis of PISA projects. The Commission also recently approved a stipulation and agreement in Liberty-Empire's most recent rate case, which addressed the cost-benefit analysis of projects over $1 million.[22]

Q. Did the parties agree to any other requirements related to PISA in the above referenced stipulation?

A. Yes. For projects over $1 million that went into service during the prior year, Ameren Missouri agreed to provide project documentation in the same docket as it files its capital budget. Staff recommends the Commission order Evergy to annually file the following documentation in its capital budget docket for projects over $1 million (EO-2019-0045 and EO-2019-0047):

- Purchase Orders
- Change Orders
- Final Project cost summaries
- Project justification summary
- Oversight reviews; and
- In-service dates.

[22] Fourth Partial Stipulation and Agreement, ER-2021-0312.

Q. What is the purpose of providing the project specific information listed above?

A. While the above list does not cover all items Staff would review in the course of a large construction audit, it is a reasonable list of items to provide annually that will assist Staff in its prudence reviews of PISA eligible projects.

EMERGENCY ENERGY CONSERVATION PLAN

Q. What is the Emergency Energy Conservation Plan?

A. The existing Emergency Energy Conservation Plan details actions taken by EMM and EMW when responding to emergency conditions on its system. EMM's plan is located in its General Rules and Regulations (PSC MO No. 2, Sheets 1.59 - 1.63, effective date, March 20, 1978) and EMW's plan is located (PSC MO No. 1, Sheets R-55 – R-58, effective date, April 22, 2004).

Q. Did Staff recommend EMM and EMW evaluate the tariffs that outline their respective Emergency Energy Conservation Plans in light of Storm Uri?

A. Yes. Staff recommended that Evergy harmonize between the two companies and update the tariff provisions.[23] Evergy had also indicated in the February 2021 winter storm investigation docket that it had initiated a review of its procedures in light of lessons learned from the events of February 2021.

[23] Missouri Public Service Commission Financial and Business Analysis and Industry Analysis Divisions and Regulatory Analysis Department report, In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Evergy Missouri Metro, Inc. d/b/a Evergy Missouri Metro, Page 69.
Missouri Public Service Commission Financial and Business Analysis and Industry Analysis Divisions and Regulatory Analysis Department report, In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Evergy Missouri West, Inc. d/b/a Evergy Missouri West, Page 68.

Q. Does Staff support the revisions proposed by EMM and EMW?

A. Generally, yes. However, Evergy has included language limiting the liability of the Company when the plan is being followed. Specifically, the proposed tariff states:

"The Company shall not be considered in default of its service agreement and shall not otherwise be liable to any customer or other person by reason of implementation by the Company of any or all of the procedures described in this Rule 17."

Staff recommends that EMM refer back to its existing tariffs that already contains a section titled Liability of Company by substituting the language above with the following language:

"Disruptions in service consistent with this Emergency Energy Conservation Plan shall not be considered inconsistent with the Company's rules regarding Supplying Electric Service contained at Sheet 1.14, paragraph 3.17."

Similarly, Staff recommends that EMW refer back to its existing tariffs as follows:

"Disruptions in service consistent with this Emergency Energy Conservation Plan shall not be considered inconsistent with the Company's rules regarding Supplying and Taking of Service contained at Sheet R-22, paragraph 3.01 A."

Q. Are there any other revisions needed to EMM's proposed Emergency Energy Conservation Plan tariff?

A. Yes. There is a repetitive phrase that should be removed from Sheet 1.12 that appears to be an editing error.

NET METERING INTERCONNECTION APPLICATION AGREEMENT

Q. What is Net Metering?

A. Net metering allows customers who install solar or other renewable energy resources to interconnect their system to the grid and to use metering equipment to net their usage and generation.[24] In Missouri, customers size their system to offset part or all of their own electrical energy requirements. During billing periods where the customer supplies excess energy (i.e. their generation exceeds their usage), the customer receives a bill credit for the excess energy portion at the avoided cost rate. For billing periods where the customer's usage is greater than their system's generation, the customer pays for the net energy. Net metering is enabled by the Net Metering and Easy Connection Act (386.890 RSMo.).

Q. What is a Net Metering Interconnection Application Agreement?

A. Commission rule 20 CSR 4240-20.065 requires the customer-generator and utility to enter into an interconnection agreement. The agreement outlines the company and customer-generator responsibilities and provides the utility information regarding the customer's renewable system so that it can ensure the customer's system can safely interconnect to the grid. Commission rule 20 CSR 4240-20.065 includes the form of the interconnection agreement, which is the basis for the individual agreements included in each of the electric utilities' tariff.

Q. Did Evergy propose changes to its Net Metering Interconnection Application Agreements?

A. Yes. EMM and EMW proposed changes to the applicability section of their respective net metering tariffs. EMM proposed changes to exclude customers participating in

[24] Section 386.890. 2.(5):
"Net metering", using metering equipment sufficient to measure the difference between the electrical energy supplied to a customer-generator by a retail electric supplier and the electrical energy supplied by the customer-generator to the retail electric supplier over the applicable billing period;

time-related pricing from participating in net metering. EMW intends to have the same language applied to its net metering tariff but had inadvertently left the language off. See attached response to Staff Data Request No. 0423 included in Schedule CME-r4.

EMW also inadvertently included language that attempted to address the availability of net metering for customer participating in distributed energy resource aggregations in the wholesale market. However, since the filing of this case, Evergy and Staff met and discussed a coordinated approach to implementation of FERC Order 2222. Evergy has indicated this tariff language should be withdrawn from consideration and Staff agrees. Schedule CME-r5 includes the response to Staff Data Request No. 0422 on this topic. EMW's proposed similar language related to FERC Order 222 in its Standby Service Rider, Sheet 128. If it is not Evergy's intention to withdraw Sheet 128 from consideration, Staff recommends the Commission reject Evergy's proposed language.

Q. Why does Evergy propose to exclude TOU customers from participating in net metering?

A. Evergy asserts that statutory changes are needed to properly allow net metered customers to participate in TOU rates because the statute defines net metering as occurring over the billing period. [25]

Q. Is Staff's proposed TOU rate design compatible with the Net Metering and Easy Connection Act?

A. Yes. Staff witness Sarah Lange's Direct Testimony (pages 53-59) discusses the compatibility of Staff's recommended default TOU rate design with net metering.

[25] ER-2022-0129 and ER-2022-0130, Direct Testimony of Brad Lutz page 24, lines 2-4; page 30 lines 2-4, page 32, lines 22-23.

Q. If the Commission adopts Staff's default TOU rate design is Evergy's proposed revision to its Net Metering Interconnection Application Agreement tariff necessary?

A. No.

Q. Is a minor clean-up revision to the related parallel generation tariffs appropriate?

A. Yes. The Net metering tariffs refer back to the parallel generation payment rate (EMM Schedule PG Sheet 31A and EMW Sheet 102.1); however, the parallel generation payment rate contains two components. One component is not applicable to net-metered customers. As Staff understand it, Evergy has been implementing the rate application for net-metered customers in accordance with the Net Metering and Easy Connection Act, however, for improved transparency Staff recommends the following tariff design:

PAYMENT RATE: $0.022 per kWh for all kWh received.

Administration adjustment (not applicable to net metering):

The payment amount calculated above shall be reduced $X.XX per month to compensate the Company for the fixed charges on the meter measuring the kilowatt-hours delivered by the Customer to the Company and for the engineering, administrative and accounting costs associated with the delivery of energy by the Customer to the Company.

DER INTERCONNECTION STUDY

Q. Has Evergy proposed terms and conditions related to interconnecting distributed generation?

A. Yes. Evergy has proposed a study and fee requirement for interconnecting distributed generation sized greater than 500 kW. EMW proposed Sheet R-30.1 and EMM Sheet 1.18.

Q. What recommendations does Staff have related to Evergy's proposed timelines for review?

A. Evergy's proposed tariff sheet related to DER interconnection studies do not reflect the requirements of the Net Metering and Easy Connection Act in terms of timelines for review. Specifically, Evergy is required to review and respond to interconnection applications for systems less than 10 kW within 30 days and 90 days for systems less than 100 kW. Staff recommends these timelines be included on EMW Sheet R-30.1 and EMM Sheet 1.18.

Q. What recommendations does Staff have related to the proposed fees?

A. Evergy has included tariff language that would allow it to charge study fess for distributed generation interconnections less than 500 kW, in some instances. Staff recommends that Evergy clarify that customer-generators under net-metering (i.e. systems less than 100 kW) would not be charged an interconnection engineering study fee.

Q. Does this conclude your testimony?

A. Yes.

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 to Implement a General Rate Increase for Electric Service	))))	Case No. ER-2022-0129
In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Request for Authority to Implement a General Rate Increase for Electric Service	))))	Case No. ER-2022-0130

AFFIDAVIT OF CLAIRE M. EUBANKS, PE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW CLAIRE M. EUBANKS, PE and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Claire M. Eubanks, PE*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Claire M Eubanks
CLAIRE M. EUBANKS, PE

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 8th day of July, 2022.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070

D Suzie Mankin
Notary Public

Evergy Missouri Metro
Case Name: 2022 Evergy MO Metro Rate Case
Case Number: ER-2022-0129

Requestor Eubanks Claire -
Response Provided April 01, 2022

Question:0284
Refer to the Direct Testimony of Brad Lutz, page 36-39, which discusses benefits or improvements of the AMI system when coupled with other technologies. Has the Company quantified these benefits? If so, please provide workpapers in excel with formulas intact. If not, why not? Claire Eubanks (Claire.eubanks@psc.mo.gov)

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC
Statement: This response is Public. No Confidential Statement is needed.

Response:

Evergy has not quantified these benefits as there is not a way of quantifying the financial value of customer value adds such as quicker outage notification and restorations.

Information provided by: **Corey Paczosa**

Attachment(s):

Missouri Verification:

Internal Use Only

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs

Internal Use Only

Evergy Missouri West
Case Name: 2022 Evergy MO West Rate Case
Case Number: ER-2022-0130

Requestor Eubanks Claire -
Response Provided April 04, 2022

Question:0297
Refer to the Direct Testimony of Brad Lutz, page 36-39, which discusses benefits or improvements of the AMI system when coupled with other technologies. Has the Company quantified these benefits? If so, please provide workpapers in excel with formulas intact. If not, why not? Claire Eubanks (Claire.eubanks@psc.mo.gov)

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Statement: This response is Public. No Confidential Statement is needed.

Response:
Evergy has not quantified these benefits as there is not a way of quantifying the financial value of customer value adds such as quicker outage notification and restorations.

Information provided by: **Corey Paczosa**

Attachment(s):

Missouri Verification:

Internal Use Only

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs

Internal Use Only

SCHEDULE CME-r2

HAS BEEN DEEMED

CONFIDENTIAL

IN ITS ENTIRETY

SCHEDULE CME-r3

HAS BEEN DEEMED

CONFIDENTIAL

IN ITS ENTIRETY

Evergy Missouri Metro
Case Name: 2022 Evergy MO Metro Rate Case
Case Number: ER-2022-0129

Requestor Eubanks Claire -
Response Provided May 18, 2022

Question:0423
(1) Refer to Evergy Missouri Metro proposed tariff sheet PSC MO No. 7, 6th revised Sheet No. 34A (Net Metering Interconnection Application Agreement). In the applicability section EMM proposes to exclude customers participating in Time-Related Pricing. Please explain EMM's reasoning and justification for excluding customers participating in Time-Related Pricing from net metering. (2) EMW's proposed Net Metering Interconnection Application Agreement (PSC MO No. 1, 5th revised Sheet No. 110.1) does not include the Time-Related Pricing exclusion. Why not? Requested by Claire Eubanks (Claire.eubanks@psc.mo.gov)

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC
Statement: This response is Public. No Confidential Statement is needed.

Response:

1) Issues with net metering and time-base rates are detailed in the direct testimony of Brad Lutz, starting on page 29, line 11. In summary, both the statute and the rule establish "billing period" as the time period for which the energy measurement and determination of net energy to occur. Billing period, as defined or inferred elsewhere in the statutes and rule or defined in our Company Rules & Regulations is a billing month, approximately 30 days. In order to properly net usage for customers on a TOU rate, the measurement must occur for each of the TOU periods established by the applicable TOU rate schedule. This inhibits correct net metering and led Evergy to make net metering unavailable for customers choosing to be served under the TOU rates.
2) EMW intends to have the EMM language applied to Net Metering Interconnection Application Agreement (PSC MO No. 1, 5th revised Sheet No. 110.1). The language was inadvertently omitted during the processing of the tariffs for filing.

Information provided by: Brad Lutz

Attachment(s):

Internal Use Only

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs

Internal Use Only

Evergy Missouri Metro
Case Name: 2022 Evergy MO Metro Rate Case
Case Number: ER-2022-0129

Requestor Eubanks Claire -
Response Provided May 18, 2022

Question:0422
(1) Refer to EMW proposed tariff sheet PSC MO No. 1, 5th revised Sheet No. 110.1 (Net Metering Interconnection Application Agreement). In the applicability section EMW proposes to add the following language "This schedule is not applicable where the Customer's electric generating and/or electric storage system(s) are registered to provide resources to Southwest Power Pool (SPP) or participate in the wholesale market (including as a part of a Demand Response (DR) or Distributed Energy Resource (DER) aggregation)." With SPP's FERC Order 2222 implementation expected to be third quarter 2025, explain EMW's reasoning and justification for incorporating the proposed revision in this case. (2) The language quoted in part 1 above, was not proposed to be included in the EMM net metering interconnection application. Why not? (3) Did EMW review all its tariffs to consider all needed changes to implement FERC Order 2222 and determine that the tariff revision is the only needed change? Requested by Claire Eubanks (Claire.eubanks@psc.mo.gov)

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC
Statement: This response is Public. No Confidential Statement is needed.

Response:

1)This language was a preliminary attempt to address the FERC Order 2222 issues expected with this tariff and was prepared based on an expectation of an earlier deadline for these changes. This draft language was inadvertently included during the tariff preparation for the rate case and should be withdrawn from consideration. Evergy has met with Staff separately on this matter and currently believes a coordinated approach will be needed to determine not only what is to be done to comply with FERC Order 2222, but what tariff changes will be needed.
2) Please see the response to part 1.
3) Please see the response to part 1.

Information provided by: Brad Lutz

Attachment(s):

Internal Use Only

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs

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