

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case Nos. EO-2023-0423 and ER-2023-0424 and
Tariff Tracking No. YE-2023-0206 and YE-2023-0208

FROM: Sarah L.K. Lange, Economist, Tariff/Rate Design Department
Claire M. Eubanks, P.E., Engineer Manager, Engineering Analysis Department
Cedric Cunigan, P.E., Sr. Professional Engineer, Engineering Analysis Department
Jared Giacone, Lead Sr. Utility Regulatory Auditor, Auditing Department

/s/ Jared Giacone 09/15/2023
Auditing Department / Date

/s/ Claire M. Eubanks, PE 09/15/2023
Engineering Analysis Dept. / Date

SUBJECT: Staff report on audit of construction costs and in-service criteria for the Hawthorn Solar generating facility

DATE: September 15, 2023

Evergy Filing

On May 19 2023, Evergy Metro, Inc. d/b/a Evergy Missouri Metro submitted revised tariff sheet 39A in Tariff Tracking No. YE-2023-0206 and Evergy Missouri West, Inc. d/b/a Evergy Missouri West submitted revised tariff sheet 109.1 in YE-2023-0208, each bearing an issue date of May 19, 2023, with an effective date of June 19, 2023. Evergy associated these tariff submissions with the recently concluded rate cases, Case Nos. ER-2022-0129 and ER-2022-0130. The tariff submittals adjust charges related to Evergy’s Solar Subscription Rider (Schedule SSP). Evergy did not submit testimony related to the proposed changes. In the accompanying filing letter, Evergy attributes the changes to the Solar Block Subscription Charge to updates based on actual costs “as discussed in rate case ER-2022-0129.” Staff is not aware of the discussion referenced by Evergy.¹

The Evergy Metro (Sheets 39- 39F) and Evergy West (Sheets 109 – 109.5) Solar Subscription Pilot (“SSP”) tariff sheets were initially promulgated in the compliance tariffs

¹ The stipulation and agreements related to the solar subscription program in ER-2022-0129 and ER-2022-0130 were to update the “distribution service rates in its compliance tariffs” and make other modifications as agreed to by signatories. Those changes were fully implemented in the compliance tariff package approved by the Commission that took effect on January 9, 2023.

** Denotes Confidential Information **

associated with Case Nos. ER-2018-0145 and ER-2018-0146. The SSP allows customers to subscribe to a portion of a solar resource. Subscribers pay a solar block charge, which is a per-kWh charge intended to reflect the cost to of the solar resource(s) built to serve the program, and a services and access charge, which is a per kWh charge for use of the Evergy system to capture other costs of service typically recovered through the residential energy charge. For subscribing customers, billed usage is reduced by the amount of solar generation produced to which the customer has subscribed.

Evergy sought various changes to the SSP in Case Nos. ER-2022-0129 and ER-2022-0130. The compliance tariffs associated with those cases were promulgated January 9, 2023, and reflected the September 6, 2022 Stipulation and Agreement provisions regarding sharing of unsubscribed portions of the resources, future expansion of the program, and a pilot program evaluation.² Additionally, the Services and Access Charge was updated as agreed to in an August 30, 2022 Stipulation and Agreement.³

The various stipulations entered in Case Nos. ER-2022-0129 and ER-2022-0130 did not address the actual construction costs related to the subscriber solar facility, located at the Hawthorn generating site, and no testimony in the case discussed whether the facility was operational and useful for service as the facility was under construction from July 2022 through January 2023. On March 3, 2023, in Case Nos. ER-2018-0145 and ER-2018-0146, Evergy filed a quarterly report and noted the facility was operational on January 11, 2023 as discussed later in this memorandum, Staff disagrees that the facility was fully operational and used for service on January 11, 2023. That filing included some information and calculations related to the subject tariff submissions.

Discussion

On June 1, 2023, Staff of the Commission filed a Motion to Open a New Docket to allow Staff time to audit the costs and evaluate the in-service criteria of the Hawthorn solar facility related to tariff submissions YE-2023-0206 (Evergy Metro) and YE-2023-0208 (Evergy West). Staff recommended that the Commission reject the submissions and direct Evergy to address the

² Stipulation and Agreement Regarding Programs and Electric Vehicle Charging Tariffs, Paragraph 3.

³ Paragraph 6c.

following issues in the new docket:

1. The proposed increase to the Solar Block cost is not consistent with the Stipulation and Agreement in EA-2022-0043 at Paragraph 11 that states the Solar Block charge should not exceed the maximum rate of \$0.13880 per kWh. Per the Stipulation and Agreement in EA-2022-0043, in its March 10, 2023 compliance filing in EA-2022-0043, Evergy noted it did not include AFUDC in its initial project budget and exceeded the budget by **. [REDACTED] **. Subscribers relied on the tariffed Solar Block charges for decisions to enroll in the SSP.
2. Staff is unaware of any reason why the Services and Access charge should change related to completion of the construction of the Solar Resource.
3. Staff has not had sufficient time to audit the costs and generation projections underlying Evergy's calculation of the "Solar Block Subscription Charge" and its listed components, the "Solar Block" cost and the "Services and Access" charge.
4. Due to the deployment of a new default rate for residential customers in Case Nos. ER-2022-0129 and ER-2022-0130, it is necessary to create separate Services and Access charges applicable to each residential rate plan. Additional changes are necessary in the language contained on the sheet to reflect these rate plans. Specifically, the total "Solar Block Subscription Charge" which is currently set out in the tariff as single amount comprised of two components. Rather than setting out the permutations of the "Solar Block Subscription Charge," it should be defined as the sum of the "Solar Block" cost and the applicable "Services and Access" charge.

On June 7, 2023, Evergy responded with its agreement to the establishment of a new EO case file to consider the construction audit of the cost and generation projections related to the Hawthorn solar facility. Evergy's response stated its intent to withdraw the submitted tariff sheets YE-2023-0206 and YE-2023-0208 and to refile them after the conclusion of the new case file. Evergy's response also stated it would file a new ET file for the Commission's consideration of the Time-of-Use (TOU) and the Service and Access charge issues. The Commission ordered these

EO dockets on June 14, 2023. Renew Missouri filed an application to intervene on July 14, 2023, and was granted intervention on July 25, 2023. Staff filed a status report on July 31, 2023, requesting an extension to September 15, 2023, to file a recommendation in these dockets. On August 1, 2023, the Commission granted the extension request. The Order requires any responses to Staff's recommendation be filed no later than September 29, 2023.

As the solar subscription tariff rate will be charged to customers and potentially increase from the solar subscription tariff currently in effect, Staff files this Memorandum documenting the results of its construction audit, as well as a recommendation regarding the in-service documentation provided, so that the Commission has the information necessary to make a determination on whether the facility is fully operational and useful for service, and the associated costs are prudent.

Audit of construction costs

The revised tariff sheets filed by Evergy on May 19, 2023, reflected a per-kWh charge higher than the currently effective tariffs. Part of Staff's investigation included an audit of the cost to construct the Hawthorn Solar facility. To do so, Staff submitted multiple data requests and performed a site visit of the Hawthorn solar facility on August 24, 2023.

Staff identified errors in Evergy's budgeting process that should be considered in any future expansion of solar subscription facilities or for additional generating facilities proposed by the Company. They are:

- 1) An amount for the Allowance for Funds Used During Construction (AFUDC) was not included in the original budget
- 2) The internal labor and overhead costs directly associated with the project were underestimated in the original budget because typical Company capital loadings were used as opposed to direct labor and overhead costs assigned to the project
- 3) The solar subscription program management and administrative costs, including overheads were not included in the original budget

The original budget amount for the Hawthorn Solar facility was ** [REDACTED] ** which included a small contingency budget amount of ** [REDACTED] **. In the original budget for the project, the Company did not include any estimates for AFUDC or for solar subscription

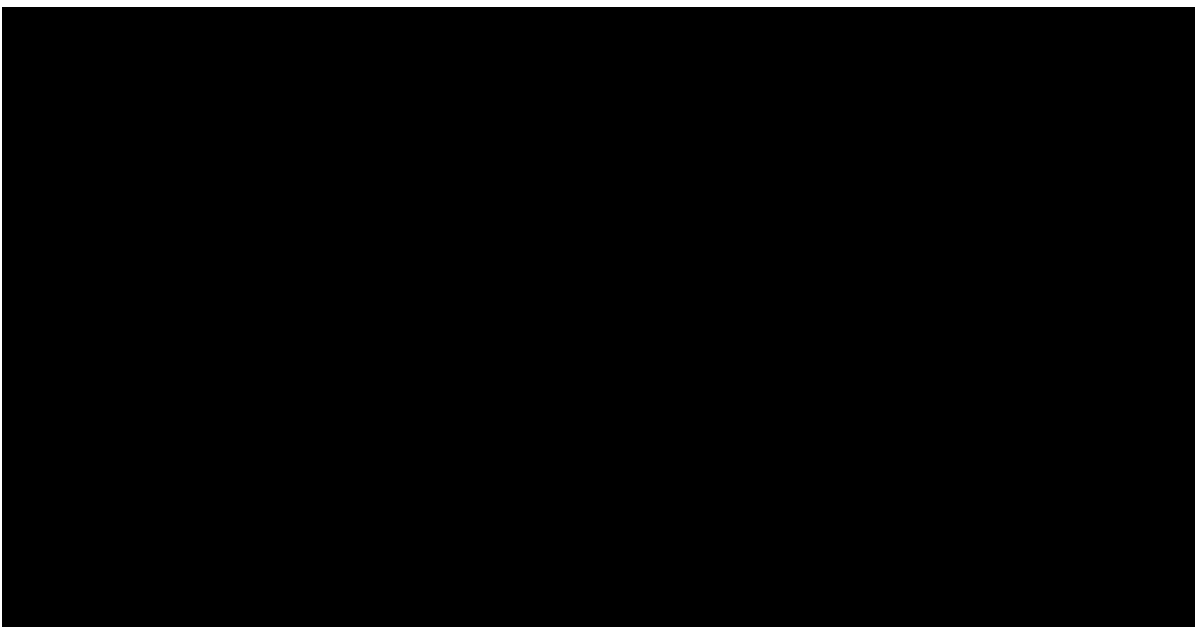
program management and administrative costs, including overheads. According to the Company's calculations in its notice of settlement compliance filed on March 10, 2023, in the EA-2022-0043 docket, the actual AFUDC amounts incurred for the project was ** [REDACTED] **. According to Data Request No. 0021 in these dockets, the solar subscription program management costs, including overheads, was approximately ** [REDACTED] **. Both of these items, AFUDC and solar subscription program management costs, including administrative overheads, were omitted from the initial budget for the project.

According to Staff Data Request 3 in these dockets, the Company also underestimated its direct labor and overhead costs allocated to the project. The underestimation was due to not including all internal labor and overhead costs as directly charged to the project whereas the original budget included an allocation (partial amount) for some of the costs that should have been directly (100%) charged to the project. As shown below, the labor and overhead variance was ** [REDACTED] **.

These three items, AFUDC, solar subscription program management costs and direct labor and overhead costs allocated to the project alone amount to approximately 5% of the original construction budget amount (approximately \$1.1 million).

The table below shows a high-level comparison of the original budget to the actual final cost:

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After reviewing the final construction costs and variances from the original budget, Staff did not discover any imprudence of costs incurred. As noted however, there were items that were inadvertently left out or understated in the original budget for the project that should be considered in future expansion of the solar subscription facility or for additional generating facilities in the future. Overall, the increase in capital costs accounts for approximately 41% of Evergy's proposed increase in the tariffed per-kWh rate.

Public Comments

On September 5, 2023, a public comment was received by the Public Service Commission (Attachment 1). The comment surrounded Evergy's Frequently Asked Questions (FAQ) listed on its website for the Solar Subscription Program (Attachment 2), which states, "Will my Solar Subscription charge be subjected to additional increases in the future? The Solar Block Subscription Charge for the cost of the resource will not increase, and may go down, if we install additional, cheaper assets." The public comment referenced the following information also on Evergy's website, "With the completion of construction for the Hawthorn Solar resource, Evergy estimates the Solar Block Subscription Charge may be updated in the future to \$0.14436 per kWh, which is comprised of the Solar Block cost of \$0.09311 and the Service and Access charge of \$0.05125, pending approval by the Missouri Public Service Commission. This potential change would account for the final construction costs of the completed solar resource."

Staff submitted Data Request number 5 in these dockets on June 22, 2023, which asked whether Evergy had received any feedback or complaints since revising the website/marketing materials. The Company responded on July 18, 2023, and stated they had not received any feedback or complaints since revising the website/marketing materials.

It should be noted that per the current tariff in effect, solar participants must remain in the solar subscription program for one year, as measured from the first bill received under the solar subscription rider. Billing began for initial program participants in April 2023 at \$0.1284 per kWh, under the solar subscription tariff that went into effect in January 2023. If the Commission approves the proposed tariff, customers would be paying \$0.14436 per kWh (which includes changes to the Services and Access charge).

Implementation/Tariff issues

In recent years, Missouri utilities have proposed several subscription based programs similar to Evergy's Solar Subscription Rider. The implementation of these programs is difficult as the resource may be completed outside of a general rate case. Subscribing customers may have the desire to utilize the program as quickly as possible. However, both subscribing and non-subscribing customers should not be subject to charges prior to projects being fully operational and used for service per Section 393.135, RSMo., which states:

Any charge made or demanded by an electrical corporation for service, or in connection therewith, which is based on the costs of construction in progress upon any existing or new facility of the electrical corporation, or any other cost associated with owning, operating, maintaining, or financing any property before it is **fully operational and used for service, is unjust and unreasonable, and is prohibited.** [Emphasis added.]

The Commission determines whether the project is fully operational and useful for service using in-service criteria. In-service criteria has been utilized to evaluate different types of generating units and retrofits since at least 1978 after Section 393.135 when into effect in 1976. Certain criteria apply to every type of project, to ensure that all major construction work is complete. Other criteria are developed for the specific characteristics of the generating facility or retrofit. Staff recommends several criterion, which in combination, are needed to determine that a unit is "fully operational" and "used for service." Certain fundamental tests are included to prove whether the unit can start properly, shut down properly, operate at its full design capacity, or operate for a period of time without tripping off line. Other items Staff would consider are whether the full output of the unit can be delivered into the electrical distribution/transmission system. An additional factor the Staff will consider is whether testing was performed pursuant to any contract and whether testing was performed prior to the company accepting the unit from the contractor.

In a subscription-based program, a tariff must be promulgated for the applicable rate or rates to be billed to customers. -However, the facility must also be found to have satisfied applicable in-service criteria before it may be lawfully reflected in rates for service. The timelines for these two necessary Commission actions do not align. Tariff promulgation normally takes 30 days, however it could be as short as 10 days if expedited treatment is requested. However, in-service

testing, particularly for solar facilities, may take several weeks to collect enough data, particularly during the winter season.

Staff recommends that in the future Evergy ensure that in-service testing is completed prior to filing a tariff to implement a new or changed rate under the SSP and other similar tariffs.

Staff’s review of Hawthorn In-service criteria

Staff reviewed information the company submitted in March 2023 related to in-service criteria as well data request responses in this case. In addition, Staff visited the Hawthorn Solar site on August 24, 2023. Staff has determined the Hawthorn site has met in-service criteria as of May 29, 2023. The in service criteria are as follows:

All major construction work is complete.	Staff verified that all construction work is complete and the facility is fully operation.
All preoperational tests are successfully completed.	Staff verified that all preoperational tests were successfully completed. ⁴
Facility successfully meets contract operational guarantees that are necessary for satisfactory completion of all other items in this list.	Staff verified that the facility contract operation guarantees necessary for satisfactory completion of all other items in this list. ⁵
Sufficient transmission/distribution interconnection facilities for the total plant design net electrical capacity exist and are fully operational and used for service.	Staff verified that sufficient transmission/distribution interconnection facilities are operational. 10 MWs of surplus interconnection is available at the interconnections site which should be sufficient for the site. ⁶
Sufficient transmission/distribution facilities exist for the total plant design net electrical capacity into the utility service territory and are fully operational and used for service.	Staff verified that sufficient transmission/distribution interconnection facilities are operational.
The facility meets at least 95% of the guaranteed AC capacity based on capacity test.	Staff verified that the facility met the 95% of the expected AC capacity as of May 29, 2023. ⁷ The contract did not include a guaranteed capacity. Due to construction being completed in winter, a functional test was performed in December 2022 instead of

⁴ Response to Staff Data Request No. 0012.

⁵ Response to Staff Data Request No. 0011.

⁶ Response to Staff Data Request No. 0013.

⁷ Response to Staff Data Requests Nos. 0010 and 0015.

	<p>the capacity test. The functional test determined that the facility produced the expected amount of energy. However, there were warranty repairs necessary after the functional test. The capacity test was completed using data from May 26, 2023 through May 29, 2023 as referenced in the report Burns and McDonnell Capacity Test Report sealed by Blaise N. Smith on July 7, 2023.</p>
<p>Upon observation of the facility for a period of 72 consecutive hours, the facility produced power in a standard operating mode when sunlight was shining on it during that period.</p>	<p>Staff verified the facility produced power during the 72 hour time frame when sunlight was shining on the facility during that period.⁸</p>

Proposed Solar Block Subscription Charge

On September 12, 2023 at 5:37 PM Evergy transmitted via email updated work papers to Staff

** [REDACTED]
 [REDACTED]
 [REDACTED]. ** Given the transmittal of

work papers just days before Staff’s recommendation, Staff has not yet fully vetted the reasonableness of Evergy’s ** [REDACTED] ** in the calculation of the Solar Block Subscription Charge. Therefore, Staff presents a high and low scenario discussed further below but ultimately recommends no change to the charges at this time.

The Solar Block Subscription Charge for energy sold through this Program is made up of two component costs: the Solar Block cost, which represents the levelized cost of energy (LCOE) for the solar facility; and the Services and Access charge of \$0.040 per kWh which represents the grid expense. The Services and Access charge was escalated pursuant to the terms of the tariff in ER-2022-0129 and ER-2022-0130.

⁸ Response to Staff Data Request No. 0016.

Evergy's proposed rate change in this tariff filing increases the charge to both components. The tariff⁹ clearly does not allow for the adjustment of the Services and Access charge between rate cases:

The Services and Access charge will be adjusted when rates are reset in future rate cases by the average percentage change to volumetric rates in those future rate cases, unless a party provides a cost study demonstrating that it would be unreasonable to adjust the Services and Access.

Further, Evergy's work paper for this case takes the Services and Access charge of \$0.040 per kWh that was determined in the last rate case and ** [REDACTED] .** This process is inconsistent with the tariff. The Services and Access charge (i.e. grid expense) will be adjusted throughout the life of the program during future general rate cases and therefore it is unreasonable to ** [REDACTED] . **

The Solar Block cost is the sum of the projected revenue requirement for each year of the facility's life divided by the sum of expected energy produced over the lifetime of the facility, resulting in an estimated fixed revenue requirement per-projected kWh for the Hawthorn solar facility.¹⁰ This can be referred to as a form of a "Levelized Cost of Energy," (LCOE) calculation. One of the complicating factors in establishing a rate as required by this program, is the need for a reliable estimate of the output of the facility over the life of the facility. If the output estimate is too high, non-participating ratepayers will subsidize the facility. If the output estimate is too low, participating ratepayers will overpay for the facility.

In an LCOE calculation, the net capacity factor (NCF) may be used to calculate the expected energy production. In this case, the increase in the non-grid charge (Solar Block cost) is partially attributable to a decrease in the annual NCF.¹¹ The original assumed NCF used in developing the estimated rate was ** [REDACTED] . ** While it is reasonable to update the NCF for as-built conditions, the net capacity factor Evergy used in support of the proposed rate is ** [REDACTED]

⁹ Evergy Metro, Inc. d/b/a Evergy Missouri Metro, P.S.C. MO. No 7, 3rd Revised Sheet No. 39A and Evergy Missouri West, Inc. d/b/a Evergy Missouri West, P.S.C. MO. No. 1, 1st Revised Sheet 109.1.

¹⁰ Future facilities may be included in the program in the future.

¹¹ The net capacity factor is the unitless ratio of actual electrical energy output over a given period of time to the theoretical maximum over that period.

[REDACTED] 12 [REDACTED]
 [REDACTED]
 [REDACTED]

[REDACTED] 13 [REDACTED]
 [REDACTED]
 [REDACTED]

[REDACTED] ** that Evergy presented in its September 12, 2023 work paper, results in a Solar Block charge of \$0.0923 per kWh. (Staff high scenario)

Given that LCOE is considering the expected cost and expected energy production over the life of a facility, the date the facility is operational will alter the resulting LCOE. In its LCOE calculation, Evergy assumes the facility was in-service on ** [REDACTED]

[REDACTED]. ** As discussed in the previous section, Staff recommends the Commission find that the Hawthorn Solar Facility is fully operational and used for service as of May 29, 2023. ** [REDACTED]

[REDACTED]
 [REDACTED]
 [REDACTED] **

The following table includes the currently effective charges, Evergy’s proposed charges per its September 12, 2023 work paper, and Staff’s high-low scenarios discussed above:

	Currently effective (per kWh)	Evergy proposed (per kWh)	Staff (High) (per kWh)	Staff (Low) (per kWh)
Solar Block	\$0.0884	\$0.09406	\$0.0923	\$0.090
Services and Access	\$0.040	\$0.05125	\$0.040	\$0.040
Total	\$0.1284	\$0.14531	\$0.1323	\$0.130

12 ** [REDACTED] **

13 Evergy’s assumptions of a NCF of ** [REDACTED] ** and ** [REDACTED] ** are not supported by the information provided to Staff at this time.

SUMMARY AND RECOMMENDATION

Staff recommends the Commission reject Evergy's proposal to increase the Solar Block Subscription Charge at this time for the following reasons:

- Solar subscription customers relied on Evergy's representations of what the final Solar Block Subscription Charge would be when enrolling in the program.
- Evergy presented a change in the assumptions regarding ** [REDACTED] ** on September 12, 2023 which Staff has not had the opportunity to fully vet.
- Evergy's assumptions are inconsistent with ** [REDACTED] **. **
- Evergy changed its LCOE model to unreasonably include ** [REDACTED] **
- Evergy is proposing an increase in the Services and Access charge outside of a general rate case in direct conflict with the currently effective tariff.

Staff is not opposed to Evergy presenting evidence in a future general rate case that reasonably calculates the Solar Block charge provided it clearly communicates to participants the basis for the increase.

Areas of concern

- 1) An amount for the Allowance for Funds Used During Construction (AFUDC) was not included in the original budget.
- 2) The internal labor and overhead costs directly associated with the project were underestimated in the original budget because typical Company capital loadings were used as opposed to direct labor and overhead costs assigned to the project.
- 3) The solar subscription program management and administrative costs, including overheads were not included in the original budget.
- 4) The solar tariff was filed and became effective prior to final construction costs and without a disclaimer that the tariff would change once final construction costs were known.
- 5) The solar tariff was filed and became effective prior to the Commission determining that the solar facility was fully operational and used for service.

- 6) The Frequently Asked Questions (FAQ) page on Evergy's website states the Solar Block Subscription Charge for the cost of the resource will not increase and did not have a disclaimer or other question and answer to explain the amounts being billed under the tariff did not yet include the final cost of construction and would be updated once construction was complete.
- 7) Projections for the Net Capacity Factor (NCF) were overstated in the revenue requirement model.
- 8) The contract did not identify the actual NCF that the project was supposed to produce.
- 9) The revenue requirement model dated February 20, 2023, that was provided to Staff for this docket showing final construction costs ** [REDACTED]
[REDACTED]
[REDACTED].**
- 10) The Services and Access charge was escalated pursuant to the terms of the tariff in ER-2022-0129 and ER-2022-0130 and it is not appropriate to revise it outside of a general rate case, although it may be clarified for application to other rate plans as one of the options discussed below.

ET Docket concerning Time-of-Use compatibility with subscription solar

Through discussions beginning with an email from Evergy to Staff on January 31, 2023, Evergy has informed Staff that it is of the opinion that “the Solar Subscription rider billing is similar to Net Metering billing,” and that it desired or intended to make changes to its tariff to restrict the availability of the Solar Subscription rider to customers taking service on the Residential Peak Adjustment rate plan.

Staff has informed Evergy that it does not view any serious obstacles to offering the SSP to customers on any residential rate plan, but that ideally the “Services and Access” charge of the SSP will need to be set out as applicable to each residential rate plan for these purposes. Staff understood that Evergy would be filing an ET case requesting promulgation of new tariff sheets

reflecting Evergy's preferred outcome, and that Staff and other parties would have the opportunity to present alternative solutions to the Commission.

In Evergy's June 7, 2023 response to Staff's June 2, 2023 recommendation concerning this matter, Evergy stated as follows:

However, the "appropriate rate plan" issue discussed on p. 4 of Staff's Recommendation, which the Company understands to be made up of the Time-of-Use ("TOU") and the Service and Access charge issues contained in Staff's Recommendation should not be addressed in the EO docket, which will be focused on Staff's construction audit. The Company will file a new ET docket by June 30, 2023 for those issues to be addressed.

In its June 14, 2023 Order Suspending Tariff Sheets, Opening Case File, and Directing Filing, the Commission noted that "Evergy also states that it would file a new ET file for the Commission's consideration of the Time-of-Use (TOU) and the Service and Access charge issues contained in Staff's Recommendation." Evergy has not filed the referenced ET case to date. Staff has met with Evergy on this matter, and responded to Evergy's requests for further clarification of Staff's concerns on this matter.

The current Schedule SSP tariff sheet availability section does not prohibit service to customers on time based rates. Evergy Metro's sheets 7F and 7G, and Evergy West's sheets 146.7 and 146.8 contain the Residential Time of Use – Two Period residential rate plan, marketed by Evergy as the Standard Peak Saver rate plan, which is the default residential service plan for residential customers beginning October 1, 2023. These sheets contain no prohibition on concurrent service with the SSP program. Staff supports including clarifying language on the billing of customers, which could take a nearly infinite number of forms.

At this time, the clarifying language that appears least disruptive to the existing tariff would be a revision of SSP "Monthly Billing" provision 2, which currently provides as follows:

The Participant's share of the solar resource energy production will be subtracted from the metered energy consumed by the Participant for the billing month. Should the solar resource energy production amount for a given month be larger than the Participant's metered energy consumption, the net energy will be zero for that month.

To clearly facilitate the billing of customers on time-based rate plans, that language could be revised as follows:

The Participant's share of the solar resource energy production will be subtracted from the metered energy consumed by the Participant for the billing month **in each applicable energy charge pricing period proportionate to that customer's usage in each applicable energy charge pricing period**. Should the solar resource energy production amount for a given month be larger than the Participant's metered energy consumption, the net energy will be zero for that month. [Emphasis added.]

It could be reasonable to further refine the interaction of the SSP with time-based rate plans in a future proceeding, such as refinement of the services and access charge to address the pricing periods of various rate plans, but in the interest of moving this matter forward, Staff would not oppose language as described above. Staff recommends that Evergy promptly file its ET cases to address this tariff change, or propose its preferred approach to address its refusal to allow SSP subscribers to participate in the default residential rate plan.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc. d/b/a)
Evergy Missouri Metro's 2023 Integrated) File No. EO-2023-0423
Resource Plan Annual Request to Revise its)
Solar Subscription Rider)

In the Matter of Evergy Missouri West, Inc.)
d/b/a Evergy Missouri West's 2023) File No. EO-2023-0424
Integrated Resource Plan Annual Request to)
Revise its Solar Subscription Rider)

AFFIDAVIT OF CLAIRE M. EUBANKS, PE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

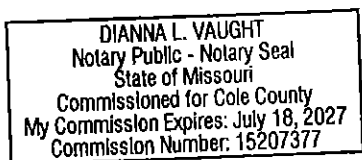
COMES NOW CLAIRE M. EUBANKS, PE, and on his oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

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 12th day of September, 2023.



Dianna L. Vaughn
Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc. d/b/a)
Evergy Missouri Metro's 2023 Integrated) File No. EO-2023-0423
Resource Plan Annual Request to Revise its)
Solar Subscription Rider)

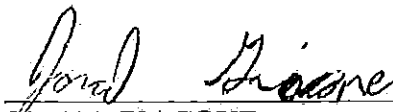
In the Matter of Evergy Missouri West, Inc.)
d/b/a Evergy Missouri West's 2023) File No. EO-2023-0424
Integrated Resource Plan Annual Request to)
Revise its Solar Subscription Rider)

AFFIDAVIT OF JARED GIACONE

STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

COMES NOW JARED GIACONE and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

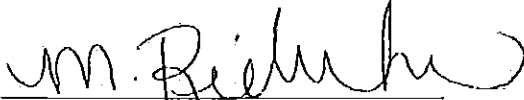


JARED GIACONE

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Jackson, State of Missouri, at my office in Kansas City, on this 12th day of September, 2023.





Notary Public