DEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Second Prudence Review)	
of the Missouri Energy Efficiency Investment)	
Act (MEEIA) Cycle 3 Energy Efficiency)	File No. EO-2023-0407
Programs of Evergy Metro, Inc. d/b/a Evergy)	
Missouri Metro)	

STAFF'S RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and for its *Staff Report* its Second MEEIA Prudence Review of Cycle 3 Energy Efficiency Programs of Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("Evergy Missouri Metro"), respectfully states to the Missouri Public Service Commission ("Commission"):

- 1. Staff's report, filed contemporaneously herewith, is the second prudence review for Evergy Missouri Metro's Missouri Energy Efficiency Investment Act (MEEIA) demand-side programs and DSIM Cycle 3 costs. It covers the review period of April 1, 2021, to March 31, 2023. Commission Rule 20 CSR 4240-20.093(11), authorized under § 393.1075.3 and § 393.1075.11, RSMo., provides that "[a] prudence review of the costs subject to the DSIM shall be conducted no less frequently than at twenty-four (24) month intervals."
- 2. Based on the review, and as more fully explained in the Staff report, Staff identified and recommends disallowances of expenses for administrative program cost expenses and implementation contractors' expenses during the review period. Staff recommends a total ordered adjustment ("OA") of \$77,229.63 plus interest in Evergy Missouri Metro's next DSIM Rider rate adjustment filing to account for these disallowed expenses.
- 3. Staff found that Evergy Missouri Metro acted imprudently by including unnecessary expenses from an implementer contractor's expenses that provided no benefit to Evergy Missouri Metro's customers. Staff recommends the Commission order an OA of \$6,549.15 plus interest for Evergy Missouri Metro's next DSIM filing.

4. Staff identified expenses for conferences and meetings that were either not primarily related to MEEIA or lacked sufficient justification for the costs of memberships. Staff recommends that the Commission order an OA of \$70,680.48 plus interest to be applied to Evergy Missouri Metro's next DSIM filing.

WHEREFORE, Staff respectfully requests the Commission accept its Second MEEIA Prudence Review of Cycle 3 Energy Efficiency Programs, filed contemporaneously herewith and issue an order directing Evergy Missouri Metro to make the Ordered Adjustment(s) reflected in the Staff Report.

Respectfully submitted,

/s/ Eric Vandergriff

Eric Vandergriff Legal Counsel Missouri Bar No. 73984 P.O. Box 360 Jefferson City, MO 65102 573-522-9524 (Voice) 573-751-9285 (Fax) Eric.Vandergriff@psc.mo.gov

Staff Counsel for the Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 27th day of October, 2023.

/s/ Eric Vandergriff