

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

In the Matter of Evergy Metro, Inc. d/b/a	)	
Evergy Missouri Metro's and Evergy	)	<b><u>File No. ET-2024-0182</u></b>
Missouri West, Inc. d/b/a Evergy Missouri	)	Tracking Nos. JE-2024-0084 &
West's Solar Subscription Rider Tariff Filings	)	JE-2024-0082

**STAFF'S PRESENTATION ON THE RECORD MEMORANDUM**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff) and provides the Commission with the following memorandum for the January 22, 2024, on-the-record presentation set by the Commission in its January 12, 2024, notice.

The specific issue Staff seeks to promptly resolve concerns the interaction between the Subscriber Solar program and residential time-based rate plans: Specifically, whether the SSR tariff should restrict SSR customers from participation in rate plans other than the residential default low differential (RPKA) rate plan? Evergy's draft tariff provisions to allow SSR customers to participate in rate plans other than the default RPKA rate are not reasonable, and would delay SSR customer rate choice past next summer, when the variety of rate plans is most pronounced. Staff's position is that if the Commission wishes for SSR customers to participate in rate plans of their choice, then guidance from the Commission is needed at this time so that Staff may use its resources efficiently.

But here is the sharp "how" point and why Staff would like a signal from the Commission immediately: How will the process work so customers don't drop off the SSR tariff, incurring a penalty for themselves, and causing a risk and cost shift to nonparticipants? Evergy says the process will take months, with no understandable explanation for how to update the billing system. So Staff needs guidance now to avoid delay if this is something the Commission wants. Very Specifically, the Staff would like guidance as follow:

A) Does the Commission want SSR customers to be able to opt into other rate plans? If so, information is needed from Evergy to develop appropriate mechanisms for each rate plan by season/period, or at a minimum, an update of the applicable percentages provided for the RPKA rate plan?

B) If the Commission wants SSR customers to be able to opt into other rate plans, how long will it take Evergy to program its billing system to do whatever it is?

**WHEREFORE**, Staff respectfully submits this memorandum.

**Respectfully Submitted,**

/s/ Paul T. Graham #30416

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**CERTIFICATE OF SERVICE**

The undersigned by his signature below certifies that the foregoing pleading was served upon all counsel of record on this January 19, 2024, by electronic filing in EFIS, electronic mail, hand-delivery, or U.S. postage prepaid.

/s/ Paul T. Graham