

**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 Missouri West, Inc.) Case No. ET-2024-0182
d/b/a Evergy Missouri West’s Solar Subscription)
Rider Tariff Filings)

**EVERGY MISSOURI METRO’S AND EVERGY MISSOURI WEST’S
PROPOSED PROCEDURAL SCHEDULE
AND RESPONSE TO STAFF’S PROPOSED PROCEDURAL SCHEDULE**

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“EMM”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“EMW”) (collectively, “Evergy” or the “Company” or “Respondent”) and for their *Proposed Procedural Schedule*, states as follows:

EVERGY’S PROPOSED PROCEDURAL SCHEDULE

1. The Company recommends that the Commission adopt the following Procedural Schedule:

<u>Item</u>	<u>Date</u>
Direct Testimony (all parties)	February 28, 2024
Rebuttal Testimony (all parties)	March 29, 2024
Surrebuttal Testimony (all parties)	April 30, 2024
Evidentiary Hearing	May 21-22, 2024
Initial Briefs (All Parties)	June 21, 2024
Reply Briefs (All Parties)	July 9, 2024

EVERGY’S RESPONSE TO STAFF’S PROPOSED PROCEDURAL SCHEDULE

2. Evergy does not support Staff’s proposed two track schedule. The Company does not believe there is a need for a separate fast track schedule for the time-based participation issues or that having four rounds of testimony regarding the other tariff issues schedule is necessary.

3. Staff advocates resolution of the TOU rate availability for solar subscription participants needs to occur by the summer season so that participants can choose a different rate.¹ Evergy has assigned participating customers to the Default Time Based Plan (Residential Peak Adjustment, Schedule RPKA). The Company believes that participants are essentially unharmed under the Default Time Based Plan relative to their position before the implementation of the TOU residential rates.

4. As Evergy has previously stated, the billing provisions of the current Solar Subscription Rider tariff require processing within a monthly billing period, a design only supported by the Residential Peak Adjustment Service, Schedule RPKA. In order to bill participants under the other TOU rate options, a method to assign or allocate solar resource output to the TOU time periods (on peak, off peak and super off peak) requires a tariff change. To address this issue and allow participants to choose another TOU rate, Evergy proposed a fixed allocation approach in its tariff filing. Additionally, Evergy has included an effective date of October 1, 2024, in its tariff filing to provide this option to customers. Evergy has stated that this timeline is necessary to modify its billing system to accomplish the fixed allocation approach.

5. Staff suggests that it is necessary Solar Subscription Rider (“SSR”) participants select any TOU rate plan before the summer season. Staff has asserted that customers may drop from the program to elect another desired TOU rate plan and claims at p. 2 of its proposed procedural schedule filing of January 8, 2024, that “[t]o the extent that SSR customers choose participation in a desired TOU rate plan, non-participating customers bear a share of the costs of the solar resources no longer covered by the lost subscription revenue.” First, the Company is not

¹ January 3, 2024 Procedural Conference Transcript, p. 11, lines 13-14.

aware that participating SSR customers are providing feedback to the Commission or the Company that they seek additional choice beyond the Default Time Based Plan, or that the Default Time Based Plan is undesirable. Staff has asserted that participants may drop from the program with no factual evidence.

6. Second, Staff's assertion that non-participating customers will bear a share of costs of the solar resources if participating customers drop out of the program due to this issue is highly unlikely. The current SSP tariff includes protection for non-participating customers for unsubscribed portions. The SSP tariff refers to how unsubscribed amounts will be allocated between shareholders and ratepayers (non-participating customers). Non-participating customers do not assume any share of costs until the unsubscribed portion is below 50 percent. And, it is Evergy shareholders who are responsible to cover any unsubscribed portions of the program when subscription levels are in the 50-100% range:

Unsubscribed amounts will be determined monthly within the companies using the monthly subscriptions in place at the time of the allocation of costs for that company. Responsibility for any undersubscribed shares will be shared between shareholders and ratepayers. The cost associated with any unsubscribed portion of Program Resources will not be included in the revenue requirement used to establish base rates if subscriptions cover at least 50 percent of Program Resources. If subscriptions cover less than 50 percent of Program Resources, then the cost associated with the unsubscribed portion below 50 percent of Program Resources will be included in the revenue requirement used to establish base rates.²

7. Furthermore, the likelihood of any unsubscribed portions below 50% occurring is very low. Currently the solar subscription tariff is fully subscribed with 489 Evergy Missouri Metro participants (2934 shares) and 261 Evergy Missouri West participants (261 shares). Evergy

² Evergy Missouri Metro P.S.C. MO. No. 7, 3rd Revised Sheet 39A (Effective January 9, 2023); Evergy Missouri West P.S.C. MO. No. 1, 3rd Revised Sheet 109.1 (Effective January 9, 2023).

currently has a waitlist of customers, which includes 68 Evergy Missouri Metro customers (534 shares) and 94 Evergy Missouri West participants (562 shares). The waiting list represents 18% of subscribed shares for Evergy Missouri Metro and 31% of subscribed shares for Evergy Central.

8. Third, Evergy would like to point out any urgency communicated by Staff to resolve before summer will likely have a limited impact to a small group of participating customers. As Evergy indicated in its January 22, 2024 On the Record Presentation to the Commission in Docket EW-2023-0199, approximately 84% of Evergy Missouri customers are on Schedule RPKA and about 16% of customers have elected other residential TOU rate options. If we apply that same ratio to Solar Subscription Rider participants, we can expect that approximately 78 EMM participants and 42 EMW participants would elect to be on other TOU rate options other than the Schedule RPKA, which they are currently taking service. This is a very limited number of customers that Staff conjectures will be impacted, if at all.

9. Lastly, Evergy notes that that the Commission approved the Solar Subscription Rider tariff as a pilot in in December 2018. In that case, the Commission had approved Evergy's three-period, voluntary TOU rate. That Solar Subscription Pilot Rider tariff restricted Solar Subscription Rider participants from being on that TOU rate. Ineligibility of participating in a period-based TOU rate has been in effect for four years before Staff raised the current issue.

10. Evergy revised its Solar Subscription Rider tariffs and has proposed these modified tariffs in this docket to allow participants to choose different TOU plans other than the Default Time Based Plan. Evergy has presented its billing solution in the revised tariffs and therefore expanding TOU availability for participants is a moot point – the question is around the practical timing needed for the Company to direct its resources to implement the required changes to its

billing system. This is why the proposed tariff includes the following language: “Beginning October 1, 2024, Residential Customers may receive service under any of the then available Residential rate schedules.” This date is based on billing system work required to implement the proposed tariff changes to include the fixed allocation approach.³ It should be noted that in the event the Commission orders a different solution for addressing the fixed allocation issue, or the tariffs approved vary from the current structure or Evergy’s proposed tariffs, the Company will need time to re-estimate the level of effort for these changes. In addition, work would not begin on the development of the rates until agreement is reached with parties, and an Order is imminent. This would certainly impact the October 1, 2024, date provided for in the proposed tariffs.

11. Staff also contends at page 3 that an expedited hearing and/or the two track procedural schedule is needed so that the process is not prejudiced by “procedural inertia”. The Company’s proposed schedule will reduce such inertia. The Commission should be aware that Staff exacerbates the inertia it complains about by making the Company’s SSR tariffs part of its wide-ranging complaint case (File No. EC-2024-0092).

³ After October 1, 2024, for Residential Customers receiving service under Schedules RTOU-2, RTOU, RTOU-3, the Participant’s share of the solar resource energy production will be allocated between peak and non-peak hours based on the fixed allocation of 55% peak and 45% non-peak for summer billing months and 60% peak and 40% non-peak for winter billing months and then subtracted from the metered energy consumed by the Participant in the peak and non-peak periods for the billing month. Should the solar resource energy production amount for a given month’s peak or non-peak period be larger than the Participant’s metered energy consumption, the net energy will be zero for that month. Evergy Missouri Metro P.S.C. MO. No. 7, 6th Revised Sheet 39B (); Evergy Missouri West P.S.C. MO. No. 1, 4th Revised Sheet 109.2. Please note that the referenced tariffs contain proposed language pending before the Commission; see, Tracking Nos. JE-2024-0081 / 0082.

WHEREFORE, the Company submits this Proposed Procedural Schedule and asks that the Commission issue an order setting the various deadlines as requested by the Company.

Respectfully submitted,

/s/ Roger W. Steiner

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CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed to counsel of record for all parties this 25th day of January 2024.

/s/ Roger W. Steiner

Roger W. Steiner