

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

In the Matter of a Collaborative Workshop for)
Customer Education and Outreach Regarding)
the Introduction of Default Time-of-Use Rates) File No. EW-2023-0199
by Evergy Metro, Inc. d/b/a Evergy Missouri)
Metro and Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West)

NOTICE TO COMMISSION

COMES NOW, Evergy Metro, Inc. d/b/a as Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) (collectively, “Evergy” or the “Company”) and for its *Notice to Commission* (“Notice”) to the Missouri Public Service Commission (the “Commission”), and states as follows:

I. FUTURE STATUS REPORTS

1. The Company understands that there will be one additional TOU on-the-record presentation in April. The Company asks that the Commission consider changing the frequency of reporting in this docket from Monthly Reporting to Quarterly Reporting, with the next report due in April ahead of the next on-the-record presentation. A subset of the data currently included in the monthly reports was also requested on a quarterly basis (such as rate switching), and most of the content currently provided in the monthly reports is heavily focused on last year’s education and awareness campaign and implementation status (i.e., pre-selection numbers), and are not relevant moving forward as we’ve evolved past the initial implementation phase. In addition, some of the reporting is happening outside of these formal report filings for things like the AAO cost reporting and items with duplicate data requests.

2. For future reporting, the Company suggests the first quarterly report be filed April 20 (for the period January 1 through March 31, 2024), July 20, 2024 (for the period April 1 through

June 30, 2024) and October 20, 2024 (for the period July 1 through September 30, 2024). The Company proposes that the reporting data included evolve to include the following information:

- a. Customer Rate Counts and Enrollment Data
- b. Rate Switching Data
- c. Any new education material created and communicated to customers

In addition, the Company would like to propose sunsetting these formal reports after the quarterly report in October 2024. At this point in time, Evergy will have provided a year's worth of data for the data points noted above.

II. PROCEDURAL SCHEDULE IN SOLAR SUBSCRIPTION RIDER DOCKET

3. The Company filed its proposed procedural schedule in Case No. ET-2024-0182. Among other things, that filing explained why the Company does not believe that an expedited schedule is necessary for developing TOU options for SSR subscribers.

III. NET METERING

4. Several times during the January 22, 2024 presentation, Staff indicated that it did not believe a statutory change was needed in order for all TOU rates to work for net metering customers. The Company believes that the current law limits TOU options for net metering customers, and the Company's position was supported by Mr. Brad Lutz in Case No. ER-2022-0129/0130. In its order in that case, the Commission recognized that "Evergy's TOU rates do not currently work for net metering customers due to the limitation of the current legislation." Additionally, Ameren Missouri has supported the current law limitations of net metering customers and TOU rates in their reply brief in Case No. ER-2022-0337¹. Furthermore, for

¹ Ameren Missouri *Reply Brief*, pp. 27-39.

Commission awareness, in the Stipulation and Agreement filed on August 30, 2022 (Revenue Requirement Stipulation in Case No. ER-2022-0129/0130), Evergy committed to developing a report that examines the technical, billing and legal barriers to offering further TOU rate options to residential customer generators with net metering or interconnection agreements. Evergy will submit this report to parties prior to the filing of its next rate case.

WHEREFORE, The Company submits this Notice to the Commission.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorneys for Evergy Missouri Metro and
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CERTIFICATE OF SERVICE

I hereby certify that a true and copy of the foregoing was emailed on this 26th day of January 2024 to counsel for all parties.

/s/ Roger W. Steiner

Roger W. Steiner