

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

In the Matter of Kansas City Power & Light)
Company’s Request for Authority to Implement)
A General Rate Increase for Electric Service) Case No. ER-2018-0145

In the Matter of KCP&L Greater Missouri)
Operations Company’s Request for Authorization to)
Implement A General Rate Increase for Electric)
Service) Case No. ER-2018-0146

NOTICE

COME NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Every Missouri West (collectively, the “Company”)¹ and respectfully state as follows to the Missouri Public Service Commission (“Commission”):

1. On September 25, 2018, the Company filed a *Non-Unanimous Stipulation and Agreement Concerning Rate Design Issues* (“Rate Design Stipulation”) which included an agreement between the Company, Staff, the Office of the Public Counsel (“OPC”), Missouri Division of Energy (“DE”), and Renew Missouri Advocates (“Renew MO”) (collectively, the “Signatories”) on a Solar Subscription Rider (“SSR”).²

2. On October 31, 2018, the Commission issued its *Order Approving Stipulations and Agreements* (“Order”) which approved the various settlements between the Signatories in these dockets, including the Rate Design Stipulation referenced above.

¹ Effective October 7, 2019, Evergy Metro Inc. d/b/a Evergy Missouri Metro adopted the service territory and tariffs of KCP&L and Evergy Missouri West, Inc. d/b/a Evergy Missouri West adopted the service territory and tariffs of GMO.

² The Company shall submit reports to the Commission Staff, OPC, Renew MO, and DE detailing an evaluation of the program and lessons learned. Reports shall be filed quarterly until the first Pilot facility(ies) is/are fully constructed. Thereafter, a report shall be filed annually for the next four years. This sequence shall be repeated for construction of the next Pilot facility(ies), if applicable. Thereafter, reports shall be filed every three years until the Pilot facilities are retired.” See Rate Design Stipulation, p. 15, Section 11(i).

3. Pursuant to the provisions of the Rate Design Stipulation, the Company is filing the attached annual report reflecting an evaluation of the program and lessons learned designated as **Exhibit A**.

WHEREFORE, the Company respectfully requests the Commission take notice of the attached.

Respectfully submitted,

/s/ Roger W. Steiner

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**ATTORNEYS FOR EVERGY MISSOURI
METRO AND EVERGY MISSOURI
WEST**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 1st day of March 2024.

Roger W. Steiner

Roger W. Steiner

**2023 Annual Program Report
Solar Subscription Rider (Schedule SSP)
Eversource Missouri Metro and Eversource Missouri West
Case Nos. ER-2018-0145, ER-2018-0146, and Docket No. EA-2022-0043**

Report Summary

Following its last Quarterly Report submitted on March 3, 2023, the Company provides this annual report to comply with the Stipulation and Agreement in Docket No. EA-2022-0043.

Construction on the Hawthorn Solar Facility was completed in December 2022, the site began operation on January 11, 2023, and Staff subsequently determined the Hawthorn site met in-service criteria as of May 29, 2023.

- On December 1, 2023, Eversource filed Schedule SSP tariffs in Docket No. ET-2024-0182 with proposed changes to the tariffs currently in effect.
- As of December 31, 2023, the SSP program enrollment of the resource for its Missouri jurisdictions' allotted capacity is at 100% of resource capacities. Eversource is maintaining a waitlist of 68 customers or 534 shares in Missouri Metro and 94 customers or 562 shares in Missouri West.
- In accordance with the Stipulation and Agreement in Case No. ER-2022-0129/0130, Eversource surveyed Solar Subscription participants in Q4 2023 covering, but not limited to, economic considerations and customer service. Results show that Solar Subscription customers are generally satisfied with the program with 36% reporting high satisfaction. Customers would like to continue to receive updates about the program benefits, solar output, and how these items impact their monthly bill.
- Renewable Energy Certificates (RECs) from the 2023 operation year at the Hawthorn Solar facility will be retired by Eversource on behalf of subscribers by the end of Q1 2024 in the North American Renewables (NAR) Registry.

Background

In 2018, Eversource received PSC approval to offer a subscription-based solar pilot program with approval of the Solar Subscription Pilot rider, Schedule SSP ("SSP"). This tariff established the terms and process where by the Company would enroll interested customers and once a sufficient number were enrolled, build the solar generating resource to provide service under the rider. Program enrollment went live in 2019 and was fully subscribed by November 2021.

Eversource's SSP program was designed to help address the physical and financial barriers customers may encounter with putting private solar on their home or business. The program provides customers that face these barriers with a product that meets this need.

A customer subscribes to shares of the solar resource. Each solar share is 500 watts (W AC). Customers can subscribe to shares that are expected to generate up to 50 percent of their average annual electric energy usage, in 10 percent increments. Participants are billed for the kWh energy produced by their subscribed solar shares based on a Solar Block Subscription Charge, which includes the cost of the Solar Block and a Services and Access Charge. Any remaining metered energy consumption will be billed under the rate associated with that participant.

Per the SSP tariff approved in Docket No. ER-2018-0145/0146, the Hawthorn Solar facility was split between jurisdictions based on the same ratio as the expected customer subscriptions. As part of Evergy’s Certificate of Convenience and Necessity (“CCN”) filing in Docket No. EA-2022-0043, allocations were locked in based on enrollment percentages at that time. Evergy allocated costs into five separate buckets utilizing the jurisdictional subscribed share percentage for Evergy Missouri Metro, Evergy Missouri West, and Evergy Kansas Metro; and also incorporating RSMo 393.1665 requirements for Evergy Missouri Metro and Evergy Missouri West. Below are the allocations:

Jurisdiction	Allocation
Evergy MO Metro, RSMo 393.1665	25%, 2.5 MWac
Evergy MO West, RSMo 393.1665	25%, 2.5 MWac
Evergy KS Metro, Schedule SSP	27%, 2.7 MWac
Evergy MO Metro, Schedule SSP	14%, 1.4 MWac
Evergy MO West, Schedule SSP	9%, 0.9 MWac

Hawthorn Solar Facility Location

Evergy’s construction of its first facility to serve SSP subscribers is located at its existing Hawthorn Generating Station, which is in the Missouri Metro service territory. Evergy selected its Hawthorn facility as the point of interconnection due to its unique economic drivers. These drivers included access to an existing interconnection, hosting capacity, and Company-owned land. This also reduced the total cost of the project by eliminating the need to procure a large specialty transformer.

2023 Marketing Outreach and Spend for Solar Subscription Program

Evergy communicated to customers via email and direct mail about the Solar Subscription array going live and starting to produce energy. Evergy included information within the communications that monthly billing would begin in April 2023. Evergy also included Solar Subscription program messaging in its marketing emails to Missouri customers. Evergy utilized social media as a marketing tactic the last half of the year to engage with more customers and to bring more awareness to the program.

Targeted email campaigns were the most cost effective since there is no direct cost to the program, and it proved to achieve a higher level of enrollments than other tactics.

Program marketing efforts in 2023 consisted of three types of activities.

- Ongoing Program Recruitment: Evergy continues to promote the Solar Subscription program in Missouri to maintain an active waitlist queue. As the waitlist of Evergy Missouri West or Evergy Missouri Metro customers reaches 1,000 shares (0.5 MWac), Evergy will move each additional 0.5 MWac portion from the 393.1665 allocation to the Solar Subscription program.

Examples of marketing included, but were not limited to, the following:

- Emails: Included in both brand emails to all Missouri Evergy customers along with targeted emails to those customers more interested in sustainable options
- Social media posts across all service territories
- Postcards at Connect Center

- Sustainability email blast sent to Missouri Metro customers speaking to the benefits of the program
- Updated web enhancements speaking to the attributes of the program
- **Waitlist Management:** Waitlist customers are proactively enrolled in the Solar Subscription program as shares become available. These efforts are intended to maintain full capacity in the 5 MWac portion under Schedule SSP. In addition, waitlist customers will be transitioned to the remaining 4 MWac under RSMo. 393.1665 to Schedule SSP once 0.5 MW per jurisdiction are enrolled.
- **Communication with Participants:** Participants received a series of email and direct mail communications ahead of their first bill. Included in these communications were billing start dates, a sample bill example, TOU rate update, a final opportunity to opt-out, and contact information should they have more questions. These ongoing communications were important to keep enrolled customers engaged and generate excitement for the full start of the program.

Evergy expended \$10,478 in 2023 on marketing and communication efforts for the Solar Subscription program.

Below are three examples of marketing collateral: a social media post, a brand email, and a billing example on the web page. All marketing collateral directs customers to the Solar Subscription web page, which includes a current billing example.



Social media post



True or false:
Solar doesn't work when it's cloudy

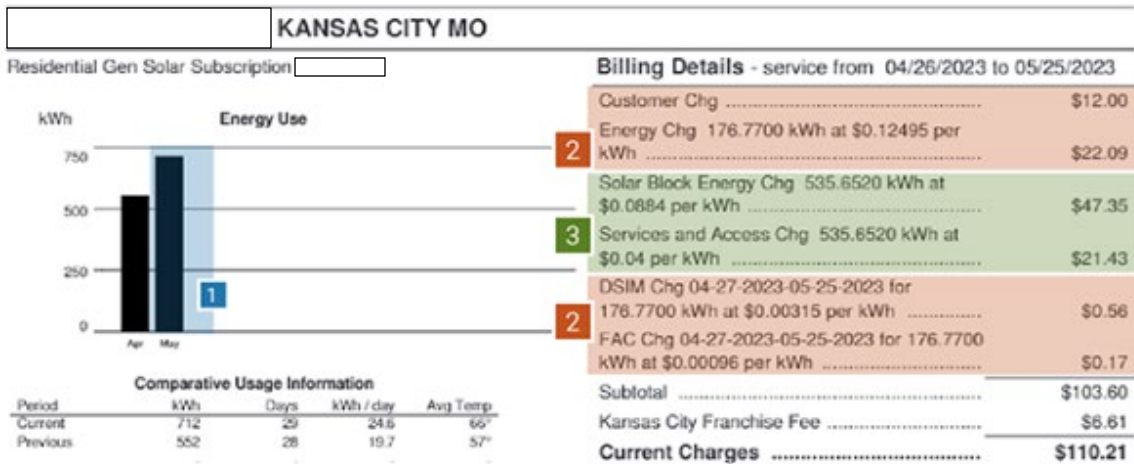
False! Just as you can still get a sunburn on a cloudy day, solar panels still capture the sun's energy when it's cloudy or raining—because there's still some light reaching the Earth (and the panels). And did you know Evergy operates several large solar arrays as part of our overall energy mix?

You can participate in solar too. Through our Solar Subscription program, you can choose to offset some of your energy usage with solar energy—**no panels or installation required.**

[Solar Subscription](#)

Brand email

Solar Subscription Billing Example - Missouri Metro



1

Energy usage at residential charge

2

Total monthly energy usage

3

Solar subscription participation items

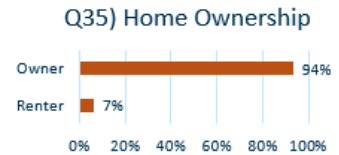
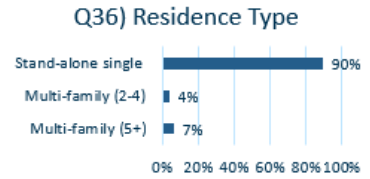
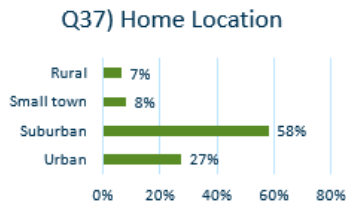
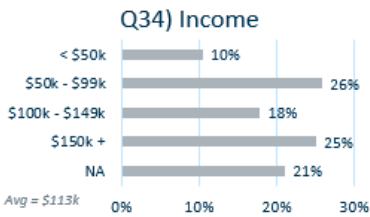
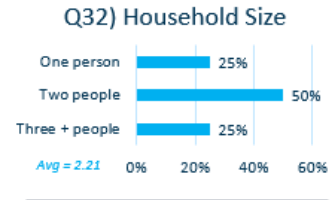
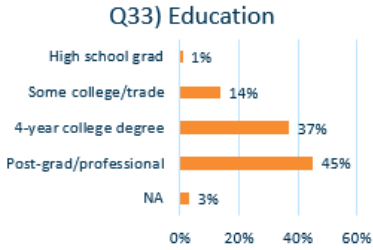
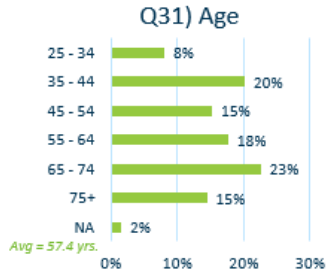
Billing example on website

Program Survey and Pilot Evaluation

Evergy conducted its first annual customer survey to Solar Subscription participants in October 2023. There were 124 Missouri respondents and 36% are highly satisfied with an average customer satisfaction rate of 6.4/10. Eighty-six percent of participants joined the program for its positive environmental impact. Also, the majority of customers have expressed interest in staying enrolled in the program as long as they can and there is broad support for building more community solar facilities.

Demographic Summary

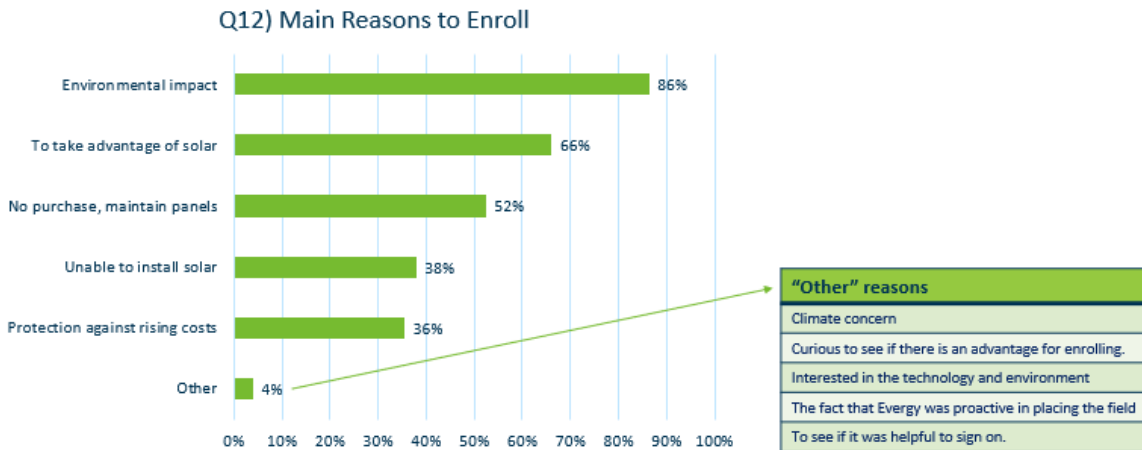
Demographics show that enrolled customers tend to be older, with higher education, and higher income. They also tend to live be suburban, single-family homeowners in a two-person household.



Reasons for Enrollment

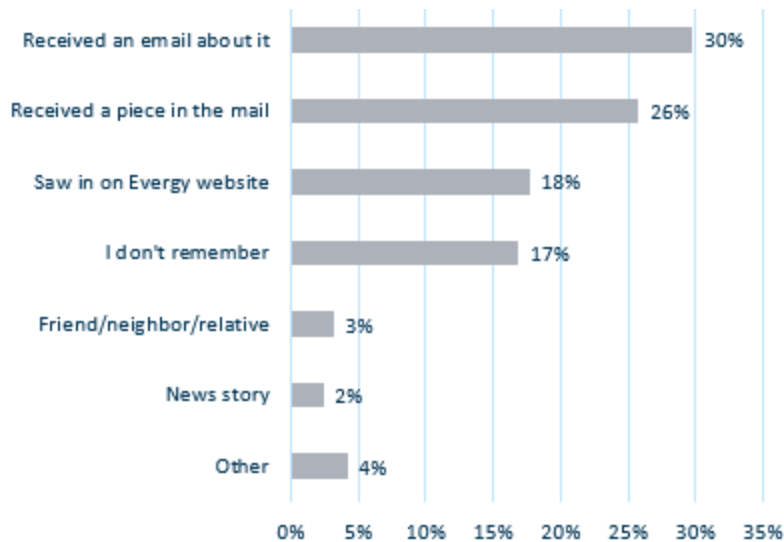
The top three reasons that customers enrolled in Solar Subscription were to support the environmental impact of renewable energy, the ability to take advantage of solar, and no purchase or maintenance costs of the solar.

Three top reasons: environmental impact, taking advantage of solar, no maintenance

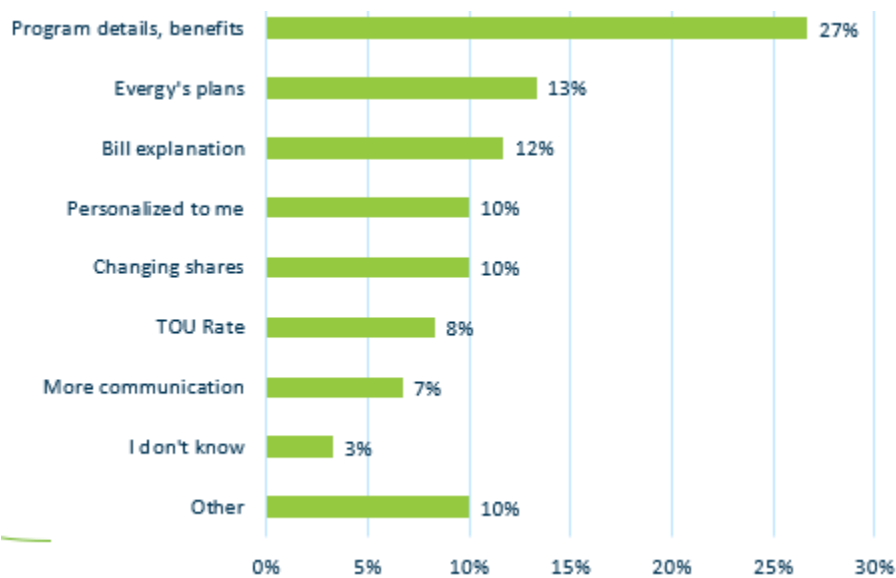


Customer Communications

Most customers first learned about the program by receiving a sign-up email about it.



Now that customers are being billed, they would like to continue to receive communications about the program benefits, solar output, and how these items impact their monthly bill.



Lessons Learned

Enrollment

Many months elapsed between when the SSP tariff was approved in 2018 and until the array was constructed and placed in service, to when participants were first billed in 2023. Since enrollments exceeded available capacity, some customers were also put on a waitlist. These factors adversely affected customer experience. To help improve the customer experience, ongoing communication with customers, including quarterly newsletters and email updates were key to maintain engagement with enrolled customers.

Marketing

The most effective campaign outreach continues to be targeted email campaigns. These are effective because there is no direct cost to the program, and they achieve a higher level of enrollments. All other marketing outreach tactics performed as expected but did not achieve the scale and efficiency of enrollments as emails.

Operations and Maintenance

Over the past year of operation, there has been ongoing operations and maintenance activities, including implementing a vegetation management strategy. This strategy includes mowing, clearing vegetation, spraying for invasive species, and understanding local shading effects. To have the highest energy output from the solar panels, it is also important to perform preventative maintenance on the inverter cooling systems and heat sinks. Some items under warranty have also been replaced by the inverter OEM, including network switches, inverter power modules, ground fault fuses, and an irradiance sensor.



Spring vegetation shading effects



Tracker motor inspections



Module cleaning – heat sink