

Exhibit No. 300

Renew Missouri – Exhibit 300
James Owen
Surrebuttal Testimony
File No. EA-2022-0328

Exhibit No.:	300
Issues:	Public Interest, Value of IRP Process
Witness:	James Owen
Sponsoring Party:	Renew Missouri Advocates
Type of Exhibit:	Surrebuttal Testimony
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MISSOURI PUBLIC SERVICE COMMISSION

EA-2022-0328

SURREBUTTAL TESTIMONY

OF

JAMES OWEN

ON BEHALF OF

RENEW MISSOURI ADVOCATES

January 31, 2023

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1 **I. Introduction**

2 **Q: Please state your name, title, and business address.**

3 A: James Owen, Executive Director, Renew Missouri Advocates d/b/a Renew Missouri
4 (“Renew Missouri”), 409 Vandiver Dr. Building 5, Suite 205, Columbia, MO 65202.

5 **Q: Please describe your education and background.**

6 A: I obtained a law degree from the University of Kansas as well as a Bachelor of Arts in
7 Business and Political Science from Drury University in Springfield. Relevant to this
8 matter, I have also practiced law for a number of years and served as an Associate Circuit
9 Court Judge in Webster County, Missouri.

10 **Q: Please summarize your professional experience in the field of utility regulation.**

11 A: Before becoming Executive Director of Renew Missouri, I served as Missouri’s Public
12 Counsel, a position charged with representing the public in all matters involving utility
13 companies regulated by the State. While I was Public Counsel, I was involved in several
14 rate cases, CCN applications, mergers, and complaints as well as other filings. As Public
15 Counsel, I was also involved in answering legislators’ inquiries on legislation impacting
16 the regulation of public utilities. In my role as Executive Director at Renew Missouri, I
17 continue to provide information and testimony on pieces of proposed legislation that may
18 impact how Missouri approaches energy efficiency and renewable energy.

19 **Q: Have you been a member of, or participant in, any workgroups, committees, or other
20 groups that have addressed electric utility regulation and policy issues?**

21 A: In May 2016 I attended the National Association of Regulatory Utility Commissioners
22 (“NARUC”) Utility Rate School. In the Fall of 2016, I attended Financial Research
23 Institute’s 2016 Public Utility Symposium on safety, affordability, and reliability. While I

1 was Public Counsel, I was also a member of the National Association of State Utility
2 Consumer Advocates (“NASUCA”) and, in November of 2017, the Consumers Council of
3 Missouri named me the 2017 Consumer Advocate of the Year. Most recently, I was
4 appointed to the Missouri Net Metering Task Force that was created by statute in 2022.

5 **Q: Have you testified previously, participated in cases, or offered testimony before the**
6 **Missouri Public Service Commission?**

7 A: In my prior role as Acting Public Counsel, I participated in a number of cases before the
8 Missouri Public Service Commission (the “Commission” or “PSC”) as an attorney and
9 director of that office. During that time, I also offered testimony in rulemaking hearings
10 before the Commission. Since becoming Executive Director of Renew Missouri, I have
11 contributed to Renew Missouri’s filed testimony in a number of matters. Attached as
12 **Schedule JO-1** is a list of my case participation.

13 **Q: Have you testified previously, participated in cases, or offered testimony before any**
14 **other state regulatory bodies?**

15 A: Yes, in my capacity as an expert witness employed by Renew Missouri, I have provided
16 testimony on behalf of a coalition of clean energy advocates before the Kentucky Public
17 Service Commission involving Kentucky Power Company’s 2020 rate case with a specific
18 emphasis on the Company’s proposed rates for net-metered customers. In addition, I was
19 recently retained to serve as an expert witness before the Kansas Corporation Commission
20 in Evergy’s pending KEEIA Cycle-One portfolio. I have also provided consulting for clean
21 energy advocates around the country regarding on-bill finance tariff programs such as Pay
22 As You Save®.

23

1 **II. Purpose and summary of testimony**

2 **Q: What is the purpose of your testimony?**

3 A: In this surrebuttal testimony, I respond to the testimony filed by representatives of the
4 Missouri Public Service Commission Staff (“Staff”) – specifically witness J Luebbert –
5 who applies a narrowly constrained standard to the public interest that ignores Commission
6 precedent. In addition, I discuss Staff’s general antipathy towards renewable energy, and
7 specifically wind energy, found in its rebuttal testimony and recommendation to deny the
8 CCN request. Finally, I address Staff witness Brad Fortson’s assessment of the role of the
9 integrated resource plan in determining need and acquisition strategy for generation assets.

10 **Q: What is your recommendation to the Commission in this case?**

11 A: The Commission should grant Evergy Missouri West’s (“Evergy” or the “Company”) requested CCN. With the Commission’s approval, the Persimmon Creek Wind Farm will
12 help the Company fulfill its capacity and energy needs while leveraging the benefits of
13 clean, economical wind power. In addition to the economic benefits Persimmon Creek will
14 provide to Evergy customers, a growing number of commercial and industrial customers
15 want more access to renewable energy resources to meet their own sustainability metrics.
16 This is important not only in terms of meeting these customers’ needs, but also in attracting
17 business to and keeping businesses in Missouri. By furthering these outcomes, Evergy’s
18 acquisition of Persimmon Creek will serve the public interest that has been clearly
19 established by Commission precedent.
20

21 Also, with this recommendation, I want to address the general thread of pessimism
22 put forward by Staff in this case regarding renewable energy, particularly with their view
23 that Missouri’s utilities should only now “evaluate” some future “move” to the use of

1 renewables.¹ The suggestion of holding off on action now ignores the widespread demand
2 for clean energy from the public generally as well as large commercial and industrial
3 customers and the economic drivers from the influx of federal funding and available tax
4 credits through the Inflation Reduction Act (“IRA”). The influx in IRA funds means that
5 renewable development will rise at an even more rapid rate and become increasingly more
6 competitive for siting and acquisition opportunities. With an identified need for capacity
7 and an economically beneficial and proven wind generation asset identified, now is the
8 time for Evergy to seize this opportunity for the benefit of its customers. Simply putting
9 this off to some undefined time in the future betrays reality.

10 **III. The Public Interest**

11 **Q: Please summarize the testimony you would like to respond to.**

12 A: Staff witness J Luebbert testifies that Persimmon Creek is a poor choice to resolve the
13 Company’s capacity need and therefore does not serve the public interest.² Mr. Luebbert
14 further testifies that the Company’s corporate renewable goals do not rise to the level of a
15 requirement to meet the needs of customers and also implies the misguided notion that the
16 wants of a “subset” of customers that would like to be served by renewable energy are
17 improperly driving this application.³ Staff witness Brad Fortson outlines an overarching
18 Staff concern that Missouri utilities are increasingly relying on IRP modeling to support
19 resource acquisitions.

20 **Q: How do you respond?**

¹ EFIS File No. EA-2022-0328, Doc. No. 26 *Rebuttal Testimony of J Luebbert*, p. 7.

² *Id.* at 14-17.

³ *Id.* at 51.

1 A: Staff witness Luebbert testifies that the Commission must define “public interest” based
2 solely on the “need” factor enumerated by the *Tartan* criteria. Mr. Luebbert’s interpretation
3 of this relationship is that, “When additions of generating assets are tied to the physical
4 needs of ratepayers, and the economic efficiency of fulfilling the identified ratepayer need
5 is demonstrated, the public interest is promoted.”⁴ While I do not disagree that this can be
6 a contributing factor in evaluating the public interest, it is certainly not the *only*
7 consideration. In fact, such a narrow characterization of the public interest is unsupported
8 by years of Commission precedent that directly addresses this issue.

9 Staff’s testimony asserts that Persimmon Creek is not necessary for Evergy to
10 provide safe and adequate service to its customers. Even if true, that fact does not mean the
11 Commission should not grant a CCN. The Commission has broad discretion to determine
12 when a project is in the public interest and can approve CCNs that are not immediately
13 necessary to serve customers. In its *Report and Order* in Case No. EA-2016-0208, the
14 Commission found that customers, “...have a strong interest in the development of
15 economical renewable energy sources to provide safe, reliable, and affordable service
16 while improving the environment and reducing the amount of carbon dioxide released into
17 the atmosphere.” Similarly, the Commission has previously concluded, “It is the public
18 policy of this state to diversify the energy supply through the support of renewable and
19 alternative energy sources. The Commission has also previously expressed its general
20 support for renewable energy generation because it provides benefits to the public.”⁵

21 Further, the Commission has stated, “(w)e are witnessing a worldwide, long-term and

⁴ *Id.* at 15.

⁵ EFIS File No. EA-2019-0010, Doc. No. 168 *Report and Order*, p. 32 (citing Sections 393.1025 and 393.1030 [Renewable Energy Standard]; and Section 393.1075 [Missouri Energy Efficiency Investment Act]).

1 comprehensive movement towards renewable energy in general and wind energy
2 specifically. Wind energy provides great promise as a source of affordable, reliable, safe,
3 and environmentally-friendly energy.”⁶ As can be seen consistently through these previous
4 CCN dockets, the Commission has made clear that incorporating economical renewable
5 energy, and specifically wind energy, into the generation mix serves the public interest.

6 **Q: What else does Staff’s overly narrow interpretation of the public interest fail**
7 **to consider?**

8 A: Mr. Luebbert’s explanation of what the public interest may or may not be entirely ignores
9 significant shifts towards clean energy from the private and public sector and also ignores
10 the role renewable energy plays in companies moving operations to Missouri. This
11 important role has been explicitly acknowledged by the Commission, which stated, “Wind
12 generation also helps corporations in Missouri to perform more competitively, as there is
13 an emergence of corporate customer interest in renewable energy and corporations are
14 seeking increased options for purchasing renewable power.”⁷

15 It should also be noted that the federal government is about to invest \$370 billion
16 in clean energy through the Inflation Reduction Act with a goal of reaching 100 percent
17 carbon pollution-free electricity by 2035; a 50-52% reduction from 2005 levels in
18 economy-wide net greenhouse gas pollution in 2030; and net zero emissions economy-
19 wide by no later than 2050.⁸ Money will be available to utility companies through tax
20 credits, loans, and grants. To be clear, this is not a matter of whether the IRA tax credits

⁶ EFIS File No. EA-2016-0358, Doc. No. 758 *Report and Order on Remand*, p. 47.

⁷ EFIS File No. EA-2019-0010, Doc. No. 168 *Report and Order*, p. 21.

⁸ “Building a Clean Energy Economy Guidebook,” Version 2 (January 2023). Accessed at:
<https://www.whitehouse.gov/wp-content/uploads/2022/12/Inflation-Reduction-Act-Guidebook.pdf>.

1 will apply to Evergy’s CCN request. It is a matter of the public policy set at the federal
2 level and how those decisions should be factored into determining the “public interest.”
3 Given these considerations, the PSC Staff need not define the “public interest” of
4 renewable assets like Persimmon Creek where Congress and the President have already
5 done so.

6 **Q: Do you believe Staff witnesses have concerns about renewable energy in general?**

7 A: Yes, I do. Despite asserting that Staff understands there is a need for a reduction in carbon
8 emissions,⁹ Staff routinely and consistently fails to properly assess the value of the larger
9 benefits renewables provide, includes language in testimony that rings eerily similar to
10 anti-renewable rhetoric, and asserts that utilities are adding renewables solely for the sake
11 of adding more renewables rather than acknowledging that renewables can actually serve
12 utility and customer needs.

13 What is equally concerning is that Staff witness Luebbert states that the “subset” of
14 Evergy customers who support renewable energy couldn’t possibly understand the
15 implications of transitioning to renewables.¹⁰ What this argument illustrates is Staff’s
16 perception that Evergy’s ratepayers, which are comprised of not only residential customers
17 but large commercial and industrial customers with their own sustainability metrics, are
18 not nearly nuanced or intelligent enough to understand their business needs, how energy
19 works, or to form an educated opinion on the transition to clean energy based on the
20 resources available to them.

21 Staff witness Luebbert also puts forward an unapplicable and unpersuasive “straw
22 man” argument, stating, “it would also not be appropriate for Evergy Missouri West to

⁹ EFIS File No. EA-2022-0328, Doc. No. 22 *Rebuttal Testimony of Claire M. Eubanks, P.E.*, p. 7.

¹⁰ EFIS File No. EA-2022-0328, Doc. No. 26 *Rebuttal Testimony of J Luebbert*, p. 52.

1 justify the addition of a large coal-fired plant, to be paid by all ratepayers, based primarily
2 on that subset of ratepayers’ desires.”¹¹ When asked whether or not there are customers
3 who want to be served only with fossil fuel generation, Mr. Luebbert’s only response is
4 “Probably” without any other explanation. In fact, I challenge any of Staff’s witnesses to
5 find a single customer who has sought such a project before this Commission from any
6 utility in Missouri or has even stated such a goal publicly.

7 It is clear that – while claiming not to oppose renewable generation generally –
8 Staff would prefer Evergy not pursue the acquisition of renewable generating assets or
9 pursue a net-zero carbon emissions goal as part of its regulated operations.

10 **IV. The Importance of the Integrated Resource Planning Process**

11 **Q: Please summarize the testimony you would like to respond to.**

12 A: Staff witness Brad Fortson outlines Staff’s overarching concern that Missouri utilities are
13 increasingly relying upon the results of integrated resource plan (“IRP”) analyses to justify
14 near-term investments and the added emphasis on additional renewable generation
15 resources in the near term.¹² Staff witness Fortson asserts that Missouri utilities are relying
16 on IRP results to justify large rate base additions prior to demonstrating physical need.¹³

17 **Q: How do you respond?**

18 A: Firstly, Staff raises several concerns about Evergy’s specific involvement with the inputs
19 to its Preferred Plan and Alternative Resource Plans. My testimony will not address any of
20 these concerns. I am not an expert on modeling, nor do I intend to offer testimony to that

¹¹ *Id.*

¹² EFIS File No. EA-2022-0328, Doc. No. 23 *Rebuttal Testimony of Brad J. Fortson*, p. 20.

¹³ *Id.* at 21.

1 extent. Rather, I will speak to the policy implications of the IRP more broadly and why the
2 IRP process is more important than simply theoretical modeling as the PSC Staff suggests.

3 **Q: What is your primary concern about Staff’s testimony?**

4 A: Staff witness Fortson downplays the policy benefits of the IRP process by characterizing
5 it simply as a “modeling exercise,”¹⁴ and noting that the approval of a utility’s IRP filing
6 is not to be construed as approval of, “resource plans, resource acquisition strategies, or
7 investment decisions.”¹⁵ While I agree Mr. Fortson accurately summarizes one of the
8 regulations governing the IRP process, the IRP serves an important role in resource
9 planning for the utilities, the Commission, and stakeholders that is beyond the narrow scope
10 the witness proposes.

11 **Q: What value does the IRP process provide?**

12 A: The IRP process carries weight beyond that of a simple modeling exercise in several ways
13 that benefit utility regulators. The benefits are best articulated in an article penned for the
14 Harvard Environmental Law Review in 2014, which concluded that,

15 “(A) thorough IRP compares supply-side resources (e.g., a new gas-fired
16 power plant) on an equivalent basis with demand-side resources (e.g.,
17 energy efficiency initiatives). As a result, cost-effective energy efficiency
18 resources cannot be ignored in favor of supply-side resources, though the
19 latter may be more attractive to utilities. The integrated resource planning
20 process therefore removes—or at least helps mitigate—a utility bias that
21 would result in higher costs for customers as well as a greater impact on the
22 environment.”¹⁶

23
24 For environmental and energy advocates, as well as the Commission, the IRP
25 process, “compels an economic analysis of issues that may otherwise be considered purely

¹⁴ *Id.* at 19.

¹⁵ *Ibid.* See also 4 CSR 4240-22.010.

¹⁶ Scott, Inara. *Teaching an Old Dog New Tricks: Adapting Public Utility Commissions to Meet Twenty-First Century Climate Challenges*, Harvard Environmental Law Review, 38, 371-413 at 410 (2014).

1 environmental.”¹⁷ For example, utilities engaged in an IRP process must forecast *all* costs
2 associated with resource acquisitions (i.e., new scrubbers or technology that would be
3 required to comply with rules and statutes imposing limitations on GHG emissions).¹⁸
4 Finally, IRP modeling can help utilities and other engaged parties identify and quantify the
5 economic risks associated with a reliance on volatile commodities such as oil, natural gas,
6 and coal, in contrast with stable costs associated with renewable resources.¹⁹

7 Put simply, the IRP is a valuable benchmark with which utilities, Commissions,
8 and stakeholders can work collaboratively to ensure that the long-term interests of
9 ratepayers and the state generally are being served in a holistic way. Looking to the results
10 of this process to help explain why Persimmon Creek is the best resource to serve customer
11 needs is certainly reasonable.

12 **Q: Are there any specific points of Mr. Fortson’s testimony you would like to respond**
13 **to?**

14 A: Yes. While the article I cited above discusses the role of the IRP in attenuating the bias of
15 the utility, the bias against renewables as part of this planning process is articulated by
16 Staff in the case at bar. At the same time Mr. Fortson criticizes the utilities for relying on
17 IRP results to support investments in renewable energy, Staff is clearly indicating its
18 preference that the utilities model and pursue plans that include adding a CT or a natural
19 gas-fired combined cycle power plant instead of renewable forms of generation.²⁰ The anti-
20 renewable bias present throughout Staff’s testimony only reinforces my opinion as to why
21 the IRP is so critical. Clearly, the PSC Staff believes meaningful long-term planning should

¹⁷ *Id.*

¹⁸ *Id.* at 410-411.

¹⁹ *Id.*

²⁰ EFIS File No. EA-2022-0328, Doc. No. 23 *Rebuttal Testimony of Brad J. Fortson*, p 18-19.

1 be gleaned from IRP filings when it comes to gas generation. However, when the utility
2 wants to rely on the IRP process as part of its basis for adding renewable generation, Staff
3 seeks to dismiss the process as some sort of academic exercise.

4 **Q: How else is the IRP process valuable from a policy perspective?**

5 A: The IRP should be seen as a documentation of the direction in which utilities are moving
6 in order to prepare for the future needs of their customers. While Staff witness Fortson
7 discusses solely the financial modeling aspect, there are more complicated matters – such
8 as externalities²¹ – that benefit from the in-depth analysis the IRP offers. Evergy’s plans
9 include the addition of renewable energy because its modeling demonstrates that these
10 resources, including Persimmon Creek, are the most beneficial resources to serve its
11 customers based on a totality of factors. This comprehensive process, which is the resource
12 planning process set forth in Commission rules, should not be so easily dismissed as mere
13 modeling, but instead be given proper weight as a valuable planning document and
14 statement of policy momentum.

15 **Q: What is your conclusion and recommendation to the Commission about the value of**
16 **the IRP in this case?**

17 A: The transition to renewable energy is being driven by a multitude of factors, including the
18 low cost of renewable energy, corporate and consumer demand, and a \$370 billion
19 investment by the federal government. IRP results that demonstrate the favorable
20 economics of renewable energy in light of these driving factors should not be discredited

²¹ Externalities, as defined by Professor Thomas Lambert on page 22 of his text *How to Regulate*, is a cost or benefit of an activity that is experienced by someone “external” to the activity. For example, when a utility company emits CO2 into the air, someone bears a cost for that, but it’s not reflected in their price. For this example, costs might be increased health care costs or lowered life expectancy. Externalities are a common market failure. As Professor Lambert further notes, externalities are “symptoms most closely related to its disease.”

1 or cast aside as a mere academic exercise due solely to anti-renewable bias by Staff. More
2 than simple modeling, I believe Evergy's plans for renewable energy acquisitions
3 demonstrate its seriousness in responsibly addressing environmental matters for its future
4 customers.

5 **Q: Does this conclude your testimony?**

6 A: Yes.

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

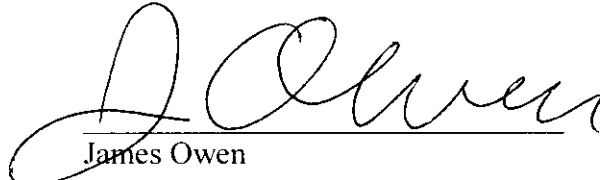
In the Matter of the Application of Evergy)
Missouri West, Inc. d/b/a Evergy Missouri West)
for Permission and Approval of a Certificate of) Case No. EA-2022-0328
Convenience and Necessity Authorizing It to)
Operate, Manage, Maintain and Control an)
Existing Wind Generation Facility in Oklahoma)

AFFIDAVIT OF JAMES OWEN

STATE OF MISSOURI)
) **ss**
COUNTY OF BOONE)

COMES NOW James Owen, and on his oath states that he is of sound mind and lawful age; that he prepared the attached surrebuttal testimony; and that the same is true and correct to the best of his knowledge and belief.

Further the Affiant sayeth not.


James Owen

Subscribed and sworn before me this 26th day of January 2023.


Notary Public

My commission expires: Oct. 27, 2025

**GRACE CHAMBERS
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI - COOPER COUNTY
COMMISSION # 21962701
MY COMMISSION EXPIRES: OCTOBER 27, 2025**

**CASE PARTICIPATION OF
JAMES OWEN**

<u>Date</u>	<u>Proceeding</u>	<u>Docket No.</u>	<u>On Behalf of:</u>	<u>Issues</u>
10/20/2017	In the Matter of a Working Case to Explore Emerging Issues in Utility Regulation	EW-2017-0245	Renew Missouri Advocates	Comments: Distributed Energy Resources
2/7/2018	In the Matter of the Application of The Empire District Electric Company for Approval of Its Customer Savings Plan	EO-2018-0092	Renew Missouri Advocates	Rebuttal: Customer savings plan, wind generation, Asbury retirement, federal tax changes
Rebuttal 7/27/2018 Surrebuttal (9/4/2018)	In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement a General Rate Increase for Electric Service In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service	ER-2018-0145/ER-2018-0146	Renew Missouri Advocates	Rebuttal: Demand Response Program Surrebuttal: Demand Response Program
6/8/2018	In the Matter of the Application of Union Electric	ET-2018-0063	Renew Missouri Advocates	Surrebuttal: Eligibility parameters, wind generation

	Company d/b/a Ameren Missouri for Approval of 2017 Green Tariff			
9/17/2018	In the Matter of Union Electric Company d/b/a Ameren Missouri's 3rd Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA	EO-2018-0211	Renew Missouri Advocates	Surrebuttal: Statutory Requirements of MEEIA
9/28/2018	In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and a Certificate of Public Convenience and Necessity Authorizing it to Construct a Wind Generation Facility	EA-2018-0202	Renew Missouri Advocates	Surrebuttal: Second Non-unanimous Stipulation and Agreement; Need for the project; Conservation conditions
11/16/2018	In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for	ET-2018-0132	Renew Missouri Advocates	Surrebuttal: Charge Ahead Programs

	Approval of Efficient Electrification Program			
1/15/2019	In the Matter of a Workshop Docket to Explore the Ratemaking Process	AW-2019-0127	Renew Missouri Advocates	Comments: Ratemaking Process
1/22/2019	In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and a Certificate of Convenience and Necessity Authorizing it to Construct a Wind Generation Facility	EA-2019-0021	Renew Missouri Advocates	Surrebuttal: Conservation conditions; Tax revenue; Benefits of wind generation
1/28/2019 9/16/2019	In the Matter of Kansas City Power & Light Company's Notice of Intent to File an Application for Authority to Establish a Demand-Side Programs Investment Mechanism	EO-2019-0132/ EO-2019-0133 (GMO)	Renew Missouri Advocates	Rebuttal: PAYS Program Surrebuttal: Energy Efficiency Policy; Additional programs
3/5/2019	In the Matter of the Application of The Empire	EA-2019-0010	Renew Missouri Advocates	Surrebuttal: Benefits of wind generation;

	District Electric Company for Certificates of Convenience and Necessity Related to Wind Generation Facilities			Conservation conditions; OPC's CCN standard
3/27/2019	In the Matter of the Joint Application of Invenergy Transmission LLC, Invenergy Investment Company LLC, Grain Belt Express Clean Line LLC and Grain Belt Express Holding LLC for an Order Approving the Acquisition by Invenergy Transmission LLC of Grain Belt Express Clean Line LLC	EM-2019-0150	Renew Missouri Advocates	Rebuttal: Commission standard; Benefits of transaction
7/15/2019	In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and a Certificate of Public Convenience and Necessity	EA-2019-0181	Renew Missouri Advocates	Rebuttal: Benefits of wind generation

	Under 4 CSR 240-3.105			
10/7/2020	Electronic Application of Kentucky Power Company for (1) A General Adjustment of its Rates for Electric; (2) Approval of Tariffs and Riders; (3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; (4) Approval of a Certificate of Public Convenience and Necessity; and 5) All Other Required Approvals and Relief	KPSC Case No. 2020-00174	Mountain Association, Kentuckians For The Commonwealth, and the Kentucky Solar Energy Association	Rebuttal: AMI meters, Net-metering, Energy Efficiency Programs, PAYS®, Economic Impacts, Rate design, Customer charge
3/5/2021	Electronic Application of Kentucky Utilities Company for an Adjustment of its Electric Rates, a Certificate of Public Convenience and Necessity to Deploy Advanced Metering	KPSC Case No. 2020-00349 / Case No. 2020-00350	Mountain Association, Kentuckians For The Commonwealth, the Metropolitan Housing Coalition, and the Kentucky Solar Energy Association.	Direct: AMI meters, Energy Efficiency Programs, PAYS®, Economic Impacts, Rate design, Customer charge

<p>7/13/2021</p> <p>8/5/2021</p>	<p>Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit.</p> <p>Electronic Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates, a Certificate of Public Convenience and Necessity to Deploy Advanced Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One- Year Surcredit.</p>			<p>Supplemental Direct Testimony: Value of Solar</p> <p>Supplemental Rebuttal Testimony: Value of Solar</p>
<p>4/16/2021</p>	<p>In the Matter of the Investigation into the Sustainability Transformation Plan of Evergy Metro, Inc., Evergy Kansas Central, Inc., and Evergy</p>	<p>Kansas Corporation Commission Docket No. 21-EKME-088-GIE</p>	<p>Climate + Energy Project (“CEP”)</p>	<p>Comments: DER, Electrification, Securitization, Transmission upgrades, Solar Resources, Wind Resources, Equitable access</p>

4/30/2021	South, Inc. (collectively Evergy)			to sustainable energy Cross-Answer Comment of Climate + Energy Project Investment in Transmission and Distribution, Merger Conditions,
6/29/2021 11/1/2021	In the Matter of the Capital Plan Compliance Docket for Kansas City Power & Light Company and Westar Energy, Inc. Pursuant to the Commission's Order in 18-KCPE- 095-MER	Kansas Corporation Commission Docket No. 19-KCPE-096-CPL	Climate + Energy Project (“CEP”)	Comments: Capital Plan, Transmission investments, Energy Efficiency investments, Renewable Investments, Comments: IRP modeled Scenarios overview, PVRR analysis, Emissions analysis by Scenario, DSM Plans,
10/15/2021	In the Matter of Union Electric Company d/b/a Ameren Missouri’s Tariffs to Adjust	ER-2021-0240	Renew Missouri Advocates	Rebuttal: High Prairie Wind Energy Center; Keeping Current Program

	its Revenues for Electric Service			
4/22/2022	In the Matter of the Electronic 2021 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company	KPSC Case No. 2021-00393	Mountain Association, Kentuckians For The Commonwealth, and the Kentucky Solar Energy Association	Comments: Pay As You Save ®/On-Bill Financing
5/27/2022	In the Matter of the Petition of The Empire District Electric Company d/b/a Liberty to Obtain a Financing Order that Authorizes the Issuance of Securitized Utility Tariff Bonds for Energy Transition Costs Related to the Asbury Plant	EO-2022-0193	Renew Missouri Advocates	Surrebuttal Testimony: Securitization
6/17/2022	In the Matter of the Application of Evergy Kansas Metro, Inc., Evergy Kansas South, Inc. and Evergy Kansas Central, Inc. for Approval of its Demand-Side Management Portfolio pursuant to the	Kansas Corporation Commission Docket No. 22-EKME-254-TAR	Climate + Energy Project (“CEP”)	Direct Testimony: MEEIA Programs, Hard-to-Reach Homes Program, Pay As You Save®/On-Bill Financing, Non-Energy Benefits Settlement Testimony:

	Kansas Energy Efficiency Investment Act (“KEEIA”), K.S.A. 66-1283			Supporting Original Settlement Agreement on Programs and Financial Recovery, Opposing Alternative Settlement Agreement
7/13/2022	In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro’s Request for Authority to Implement a General Rate Increase for Electric Service In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West’s Request for Authority to Implement a General Rate Increase for Electric Service	ER-2022-0129/ ER-2022-0130	Renew Missouri Advocates	Rebuttal Testimony: Time-of-Use Rates for Distributed Generation Customers, Green Pricing REC Program, Energy Burden Data Sharing
1/18/2023	In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of a Subscription-Based Renewable Energy Program	EA-2022-0245	Renew Missouri Advocates	Surrebuttal Testimony: Public Interest, Need, Corporate Demand for Renewables