

*Exhibit No.:*  
*Issue(s):* *Business Demand Response*  
*Witness:* *Jordan T. Hull*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Direct Testimony*  
*Case Nos.:* *EO-2023-0369 and*  
*EO-2023-0370*  
*Date Testimony Prepared:* *May 24, 2024*

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**ENERGY RESOURCES DEPARTMENT**

**DIRECT TESTIMONY**

**OF**

**JORDAN T. HULL**

**EVERGY METRO, INC.,  
d/b/a Evergy Missouri Metro  
CASE NO. EO-2023-0369**

**EVERGY MISSOURI WEST, INC.,  
d/b/a Evergy Missouri West  
CASE NO. EO-2023-0370**

*Jefferson City, Missouri*  
*May 24, 2024*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13

**TABLE OF CONTENTS OF  
DIRECT TESTIMONY  
OF  
JORDAN T. HULL**

**EVERGY METRO, INC. d/b/a EVERGY MISSOURI METRO  
CASE NO. EO-2023-0369  
and  
EVERGY MISSOURI WEST, INC. d/b/a EVERGY MISSOURI WEST  
CASE NO. EO-2023-0370**

EXECUTIVE SUMMARY .....1  
ARCs AND BDR BUDGETS.....2

1 **DIRECT TESTIMONY**

2 **OF**

3 **JORDAN T. HULL**

4 **EVERGY METRO, INC. d/b/a EVERGY MISSOURI METRO**

5 **CASE NO. EO-2023-0369**

6 **and**

7 **EVERGY MISSOURI WEST, INC. d/b/a EVERGY MISSOURI WEST**

8 **CASE NO. EO-2023-0370**

9 Q. Please state your name and business address.

10 A. Jordan T. Hull, 200 Madison Street, Jefferson City, Missouri 65102.

11 Q. By whom are you employed and in what capacity?

12 A. I am employed by the Missouri Public Service Commission (“Commission”)  
13 as an Associate Engineer in the Energy Resources Department.

14 Q. Please describe your educational background and work experience.

15 A. Please refer to the attached Schedule JTH-d1.

16 Q. Have you previously filed testimony before this Commission?

17 A. Yes, I have. Please refer to the attached Schedule JTH-d1 for a list of cases in  
18 which I have previously filed testimony.

19 **EXECUTIVE SUMMARY**

20 Q. What is the purpose of your direct testimony?

21 A. I support Staff’s overall recommendation in this case that it is not reasonable  
22 at this time for the Commission to approve a Missouri Energy Efficiency Investment Act  
23 (“MEEIA”) program portfolio and its corresponding cost recovery. My direct testimony  
24 discusses certain aspects of Aggregator of Retail Customers (“ARCs”) and Evergy Metro, Inc.  
25 d/b/a Evergy Missouri Metro (“EMM”) and Evergy Missouri West, Inc. d/b/a  
26 Evergy Missouri West’s (“EMW”) Business Demand Response (“BDR”) program.

1 If the Commission determines that MEEIA programs should continue, my direct testimony  
2 will provide certain issues the Commission should consider.

3 **ARCs AND BDR BUDGETS**

4 Q. What is an ARC?

5 A. According to (Midcontinent Independent System Operator, Inc) MISO,<sup>1</sup>

6 An ARC is a Market Participant (“MP”) that represents demand response on behalf of  
7 one or more eligible retail customers, for which the participant is not such customers’  
8 Load Serving Entity (“LSE”), and intends to offer demand response directly into the  
9 Transmission Provider’s Energy and Operating Reserve Markets as a Demand  
10 Response Resource (“DRR”), as a Planning Resource such as a Load Modifying  
11 Resource (“LMR”) or an Emergency Demand Response (“EDR”) resource.”<sup>2</sup>

12 Q. Are ARCs now able to operate in Missouri?

13 A. Yes, the Commission opened a working docket, EW-2021-0267, to receive  
14 input and determine how the Commission may best respond to the changes that will result  
15 from implementation of the Federal Energy Regulatory Commission’s (“FERC”)  
16 Order No. 2222, and to review the Commission’s current practices in the areas affected by  
17 that order. Initial comments in March and April of 2021 requested the Commission re-examine  
18 its 2010 Order temporarily prohibiting the demand response load reductions of customers of  
19 the four Missouri electric utilities regulated by the Commission from being transferred to the  
20 wholesale electricity markets directly by retail customers or third-party aggregations of retail  
21 customers. In the EW-2021-0267 order, the Commission lifted a portion of the prohibition to  
22 allow larger commercial and industrial (“C&I”) customers (100 kW or larger) to participate  
23 in demand response programs in wholesale electricity markets directly or through an ARC.  
24 The original order was to be effective December 11, 2023; however, on November 29, 2023,

---

<sup>1</sup> Evergy is a member of the Southwest Power Pool, however MISO’s ARC definition still applies.

<sup>2</sup> Miso.org, Frequently Asked Questions: Aggregator of retail Customers (ARC), page 3

1 the Commission issued an order extending the effective date of its partial modification order  
2 to January 1, 2024.

3 Q. What is a Business Demand Response (BDR) Program?

4 A. Per the Department of Energy, “Business demand response allows commercial  
5 and industrial organizations to play a significant role in balancing the supply and demand of  
6 electricity. During peak periods or times of grid stress, businesses can voluntarily reduce or  
7 shift their electricity usage. By doing so, they contribute to maintaining grid stability and  
8 preventing overloads. Utilities or grid operators pay these businesses for their participation in  
9 demand response programs. Essentially, companies receive compensation for adjusting their  
10 energy consumption when needed. Power companies can cycle air conditioners and water  
11 heaters on and off during peak demand in exchange for financial incentives and lower  
12 electric bills.”<sup>3</sup>

13 Q. Can retail customers participate in a utility MEEIA BDR program and be a  
14 participant in an ARC’s demand response program?

15 A. No, the Commission’s order in EW-2021-0267 does not allow for it.

16 Q. If the Commission determines that ratepayer funded BDR programs should  
17 continue, should a MEEIA business demand response program budget decrease with the  
18 Commission’s lifting of the ARC prohibition?

19 A. Staff would expect some business customers to move from utility BDR  
20 programs to ARCs. Staff would expect the BDR budgets to decrease over time as businesses  
21 start recognizing this new emerging market with more opportunities. From a fair competition

---

<sup>3</sup> <https://www.energy.gov/oe/demand-response>.

Direct Testimony of  
Jordan T. Hull

1 perspective, Staff would also expect the utility company's BDR incentives to not be higher  
2 than the ARCs.

3 Q. Does this conclude your direct testimony?

4 A. Yes.

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

In the Matter of Evergy Metro, Inc. d/b/a )  
Evergy Missouri Metro's Notice of Intent to ) Case No. EO-2023-0369  
File an Application for Authority to Establish )  
a Demand-Side Programs Investment )  
Mechanism )  
)  
n the Matter of Evergy Missouri West, Inc. )  
d/b/a Evergy Missouri West's Notice of ) Case No. EO-2023-0370  
Intent to File an Application for Authority to )  
Establish a Demand-Side Programs )  
Investment Mechanism )

**AFFIDAVIT OF JORDAN T. HULL**

STATE OF MISSOURI )  
) ss.  
COUNTY OF COLE )

COMES NOW JORDAN T. HULL and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Direct Testimony of Jordan T. Hull*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

  
\_\_\_\_\_  
JORDAN T. HULL

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 22<sup>nd</sup> day of May 2024.



  
\_\_\_\_\_  
Notary Public

**Jordan T. Hull**

**CURRENT POSITION:**

I am currently an Associate Engineer in the Energy Resources Department, Industry Analysis Division, of the Missouri Public Service Commission.

**EDUCATIONAL BACKGROUND & WORK EXPERIENCE:**

I received my Bachelor of Science Degree in Biological Engineering from the University of Missouri-Columbia in May of 2016. In June of 2016 I began employment with the Missouri Department of Natural Resources in the Air Pollution Control Program as an Environmental Engineer I. In June of 2017, I was promoted to an Environmental Engineer II within the Air Pollution Control Program. I began employment with the commission in November of 2018.

**Summary of Case Involvement:**

<b>Case Number</b>	<b>Utility</b>	<b>Type</b>	<b>Issues</b>
EO-2019-0067	KCP&L GMO	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2019-0068	KCP&L	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2019-0049	Liberty-Empire Electric Company	Integrated Resource Plan	Misc.
EO-2019-0132 & EO-2019-0133	KCP&L	MEEIA	Misc.
EO-2019-0257	Ameren- Missouri	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
ER-2019-0335	Ameren- Missouri	Rate Case	Heat Rates
ER-2019-0374	Liberty-Empire Electric Company	Rate Case	Heat Rates
EO-2020-0059	Liberty-Empire Electric Company	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2020-0262	EvergyWest	FAC Prudency Review	Heat Rates, Plant Outages, Generation



			Utilization, Self-Commitment.
EO-2020-0263	Evergy Metro	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0060	Ameren- Missouri	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0021	Ameren- Missouri	Integrated Resource Plan	Misc.
EO-2021-0281	Liberty- Empire	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0035	Evergy- Metro	Integrated Resource Plan	Misc.
EO-2021-0036	Evergy- West	Integrated Resource Plan	Misc.
EO-2021-0060	Ameren- Missouri	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
ER-2021-0240	Ameren- Missouri	Rate Case	Heat Rate
ER-2021-0312	Liberty- Empire	Rate Case	Heat Rate
EO-2021-0331	Liberty Empire	Integrated Resource Plan	Misc.
EA-2022-0099	Ameren- Missouri	CCN	Qualified to construct
EO-2022-0337	Ameren- Missouri	Rate case	Heat Rate
E0-2022-0245	Ameren- Missouri	CCN	Qualified to construct
EO-2023-0087	Liberty- Empire	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EA-2023-0017	Grain Belt Express LLC	CCN	Qualified to construct
EO-2023-0180	Ameren- Missouri	MEEIA Prudency Review	Demand Response