

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

In the Matter of the Application of)
Great Plains Energy Incorporated for)
Approval of its Merger with) File No. EM-2018-0012
Westar Energy, Inc.)

NOTICE OF COMPLIANCE

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

1. Pursuant to Condition 5 of the Merger Commitments and Conditions identified in Exhibit A to the *Stipulation and Agreement* (“Agreement”) filed in this docket on January 12, 2018, as approved by the Commission’s *Report and Order* dated May 24, 2018, Evergy Missouri Metro and Evergy Missouri West hereby notify the Commission of their compliance with the following element of Condition 5:

Each agency is required to provide documentation to KCP&L and GMO to verify how expenditures were incurred.

Community Action Agencies are required to file annual reports with KCP&L and GMO on how funds were expended. KCP&L and GMO shall file a condensed report of the agencies individual annual reports with the Commission, Staff and OPC. Any additional information is left to the agencies’ discretion (e.g., estimated additional homes weatherized because of the expenditures).²

2. Attached as **Exhibit A**, please find a report summarizing the information required by the above-cited portion of Condition 5.

¹ Effective October 7, 2019, Evergy Missouri Metro adopted the service territory and tariffs of Kansas City Power & Light Company (“KCP&L”) and Evergy Missouri West adopted the service territory and tariffs of KCP&L Greater Missouri Operations Company (“GMO”).

² See *Report and Order*, Exhibit A, Condition 5, pp. 1-3, issued May 24, 2018.

WHEREFORE, Evergy Missouri Metro and Evergy Missouri West request that the Commission take notice of the information herein.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorneys for Evergy Missouri Metro
and Evergy Missouri West**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed or mailed, postage prepaid, this 3rd day of June 2024, to all counsel of record.

/s/ Roger W. Steiner

Attorney for Evergy Missouri Metro and Evergy
Missouri West

EM-2018-0012 Merger Condition 5 – Report Summary

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The entities involved per the Stipulation and Agreement are:

- United Services CAA (CAA of Greater Kansas City)
- Community Action Partnership of Greater St. Joseph (“CAP St. Joe”)
- Community Services, Inc. (“CSI”)
- West Central Missouri CAA
- Missouri Valley CAA
- Community Action Partnership of North Central Missouri.

All entities received \$50,000 in July 2018, 2019, 2020, 2021, 2022 and 2023. All parties to the case agreed that CSI would receive \$100,000 each year and cover the area that was formerly covered by CAP St. Joe.

To facilitate the compilation of the required report in Condition 5, Geoff Marek, OPC, provided eight questions as guidelines for information to be furnished by the Community Action Agencies (“CAA”).

Those questions are:

- 1.) Were you successful in spending down the annual allocated funds?
- 2.) What did you spend the funds on—please provide details
 - a. Weatherization training and certification of agency personnel?
 - b. Discretionary funds for health and hazard for on-site units (that may or may not be otherwise passed over)?
 - c. Outreach efforts?
 - d. Utility weatherization account?
 - e. Hardship fund for on-bill payments?
- 3.) Can you provide quantification of benefits achieved via the funds (e.g., five more homes, one full time job, etc.....)?
- 4.) What would you say are the current strengths your agency possesses?
- 5.) What would you say are the current weaknesses your agency experiences?
- 6.) What are the current threats that your agency faces?

- 7.) What are the current opportunities for your agency to perform its service better-and how can this collaborative or its members help enable that?
- 8.) Do you believe that utility-funded weatherization funds would be better spent with more discretion by your agency? That is, would they be more effectively utilized in the same manner as the “Evergy-merger funds” or as they currently are—adhering to the Missouri Weatherization guidelines. Please explain.

The following is the condensed report of the answers from the five entities receiving these funds from Evergy.

1 – Three agencies spent 100% of the funds were consistent compared to prior year. One agency spent 80% of the funds, which was an improvement compared to prior year. One agency was at a spend level of less than 20% reported that they have been utilizing Evergy Home Repair funds first.

2 and 3 – One full time job was created by offsetting material expenses. Three agencies reported a total of fifty-six homes assisted. One agency did an additional 2-3 homes a month than they would if they were just using state funds and was able to do more health and safety measures. Projects related to plumbing, electrical repairs, ceiling repairs, replacing breaker boxes, removing knob and tube wiring, installing electrical heating systems, water heaters, heat pumps, and A/C units were completed. Funds were also spent on purchasing tools to improve work performance, salary for office personnel, pay increase for crew members to keep up with other industries in the area. One agency stressed that they provided enhanced weatherization to some client’s homes by providing measures that were just under the DOE SIR requirement of 1.0. Four agencies reported outreach efforts.

4 – The main theme is all have qualified, experienced, and knowledgeable staffs performing excellent weatherization services by DOE standards. One agency mentioned they always focused on stopping air flow and maximizing the dollars to provide all the services and measures they can for our clients. One agency has successfully utilized Mobile Action Center and a texting platform to effectively provide services and communicate with many clients; and has also completed a DNR/DE technical monitoring visit on April 29 – May 1, 2024, resulted in no findings.

5 – There were recruiting challenges in a complicated labor economy. One agency reported not being able to acquire materials timely and keep average cost per home within limit. One agency reported furnace contractors were falling behind due to additional allowance of system replacements. One agency reported that they cover a large territory that requires significant drive time to reach client homes for the auditors and crew. This decreases the number of homes they can complete.

6 – Cost of materials is a threat. Ability to retain qualified and trained employees. Insufficient number of complete applications. Matching production to the new influx of funding given the recruiting challenges in a complicated labor economy.

7 – Allow each agency to also use the funding from EVERGY with Municipal Companies that receive their power from Evergy which would allow assistance to more people. Partnership with Evergy and the new tariff enable the agencies to weatherize more homes and provide services to the community the regulations would traditionally exclude. Take advantage of promotional items for marketing and educational events provided by Evergy. Utilize billboards and allow programs to cross qualify applicants. Collaboration with renewable energy to provide resources to clients for greater long-term savings in energy costs.

8 – Most agencies feel positive about using all funds like how the Evergy funds can be spent to have more flexibility. One agency reported that their clients are typically struggling to maintain their properties in general, which presents health and safety barriers to their team in providing services. These barriers are issues such as foundations in need of repair, roofs that need repair or replacement, mold mitigation, pest infestations, clutter, etc. Many of these issues have a higher cost than weatherization measures, so any flexibility in funding that can allow for these measures to be completed, and remove the barriers to providing weatherization services, is extremely valuable to the agency. One agency expressed satisfaction with the way the funds are currently spent and reported that Evergy has implemented some incredible changes over the last couple of years that has increased the number of clients they can serve. One agency is appreciative of utility Weatherization funds that has allowed them to do additional measures to homes that otherwise could not have been done with DOE funds.