

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

DIRECT TESTIMONY OF J LUEBBERT

Schedule JL-r1

**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
July 9, 2024*

**** Denotes Confidential Information ****



Evergy Missouri Metro
Case Name: 2023 MO Metro MEEIA Cycle 4
Case Number: EO-2023-0369

Requestor Luebbert J. -
Response Provided June 27, 2024

Question:0002

Please refer to the definition of “Participant” included on page 3 of 109, Appendices 8.6 and 8.7 of the Application in this case (labeled P.S.C. MO. No. 1, 1st Revised Sheet No. R-74), which has been reproduced below for ease of reference: “Participant - End-use customer and/or manufacturer, installer, or retailer providing qualifying products or services to end-use customers.”

1. Provide an explanation of all scenarios that may occur that results in a manufacturer being considered the program Participant.

- a. Define manufacturer as used in this definition.
- b. What incentive, as defined on the same sheet, would be made available to such participants?
- c. Identify the specific measures and the specific programs under which a manufacturer will be considered the program Participant.
- d. Identify the participation, by year, from 2018 through 2024, that a manufacturer was the program Participant including program, measure types, and incentives provided.
- e. Fully explain how Evergy ratepayers realize benefits from manufacturers as program Participants.
- f. Identify how Evergy has accounted for manufacturers as program Participants in the estimation of costs and benefits for the Cycle 4 programs.
- g. Why is this type of program participation necessary or reasonable in the context of MEEIA Cycle 4?
- h. What level of participation for each program is expected to result in manufacturers as the program Participant? Provide all support for the assumptions utilized to determine the values.

2. Provide an explanation of all scenarios that may occur that results in an installer being considered the program Participant.

- a. Define installer as used in this definition.
- b. What incentive, as defined on the same sheet, would be made available to such participants?
- c. Identify the specific measures and the specific programs under which an installer will be considered the program Participant.
- d. Identify the participation, by year, from 2018 through 2024, that an installer was the program participant including program, measure types, and incentives provided.
- e. Fully explain how Evergy ratepayers realize benefits from installers as program Participants.
- f. Identify how Evergy has accounted for installers as program Participants in the estimation of costs and benefits for the Cycle 4 programs.



- g. Why is this type of program participation necessary or reasonable in the context of MEEIA Cycle 4?
 - h. What level of participation for each program is expected to result in installers as the program Participant? Provide all support for the assumptions utilized to determine the values.
3. Provide an explanation of all scenarios that may occur that results in a retailer being considered the program Participant.
- a. Define retailer as used in this definition.
 - b. What incentive, as defined on the same sheet, would be made available to such participants?
 - c. Identify the specific measures and the specific programs under which a retailer will be considered the program Participant.
 - d. Identify the participation, by year, from 2018 through 2024, that a retailer was considered the program Participant including program, measure types, and incentives provided.
 - e. Fully explain how Evergy ratepayers realize benefits from retailers as program Participants.
 - f. Identify how Evergy has accounted for retailers as program Participant in the estimation of costs and benefits for the Cycle 4 programs.
 - g. Why is this type of program participation necessary or reasonable in the context of MEEIA Cycle 4?
 - h. What level of participation for each program is expected to result retailers as the program Participant? Provide all support for the assumptions utilized to determine the values.
4. Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

1. Provide an explanation of all scenarios that may occur that results in a manufacturer being considered the program Participant.
With respect to this definition, it is considering that there could be a possibility that the incentive could be provided to the manufacturer as a reduction to the measure on behalf of the customer. This is also referred to as moving the incentive “upstream”. Evergy has not previously engaged with manufacturers to apply an incentive upstream.
 - a. Define manufacturer as used in this definition.
This may include companies that manufacture the energy efficiency measures.
 - b. What incentive, as defined on the same sheet, would be made available to such participants?
The incentive, as it applies to each of the measures, that the customer is participating may be re-assigned to a installer by the customer who is participating in a program.



c. Identify the specific measures and the specific programs under which a manufacturer will be considered the program Participant.

At this time, Evergy has not identified any specific measures or programs that it would engage with a manufacturer.

d. Identify the participation, by year, from 2018 through 2024, that a manufacturer was the program Participant including program, measure types, and incentives provided.

Evergy did not engage with any manufacturers during this period.

e. Fully explain how Evergy ratepayers realize benefits from manufacturers as program Participants.

Similar to providing the rebate to installers as a pass through to the customer, customers value the immediate reduction in the cost of the measure rather than waiting for the rebate from Evergy and having to provide additional documentation of the installation of the measure.

f. Identify how Evergy has accounted for manufacturers as program Participants in the estimation of costs and benefits for the Cycle 4 programs.

Evergy has not differentiated between customers or manufacturers as program participants in its Cycle 4 filing.

g. Why is this type of program participation necessary or reasonable in the context of MEEIA Cycle 4?

See response to (e).

h. What level of participation for each program is expected to result in manufacturers as the program Participant? Provide all support for the assumptions utilized to determine the values.

This has been undetermined given that Evergy did not engage with manufacturers in prior MEEIA cycles to support business customers.

2. Provide an explanation of all scenarios that may occur that results in an installer being considered the program Participant.

With respect to this definition, it is considering that there could be a possibility that the incentive could be provided to the installer should the rebate be reassigned from the customer to the installer to reduce the upfront invoice amount.

a. Define installer as used in this definition.

Trade ally contractor.

b. What incentive, as defined on the same sheet, would be made available to such participants?

The incentive, as it applies to each of the measures, that the customer is participating may be re-assigned to a installer by the customer who is participating in a program.

c. Identify the specific measures and the specific programs under which an installer will be considered the program Participant.

Refer to measures for Business Energy Efficiency Programs within the TRM as provided in this filing.

d. Identify the participation, by year, from 2018 through 2024, that an installer was the program participant including program, measure types, and incentives provided.

Below is a summary of rebates/incentives that were reassigned to installers from participating customers in the Business EE Program.



Business Energy Savings Program Trade Ally Programs Rebate Payments

Year	Rebate Reassignment	Measure Type (s)
2018	\$956,385.51	All available energy efficiency upgrade measures
2019	\$2,331,361.87	All available energy efficiency upgrade measures
2020	\$1,589,472.44	All available energy efficiency upgrade measures
2021	\$820,014.71	All available energy efficiency upgrade measures
2022	\$1,623,100.63	All available energy efficiency upgrade measures
2023	\$1,096,296.39	All available energy efficiency upgrade measures
2024 (through May)	\$462,155.10	All available energy efficiency upgrade measures
Total Since 2018	\$8,878,786.66	All available energy efficiency upgrade measures

e. Fully explain how Evergy ratepayers realize benefits from installers as program Participants.

The rebate is reassigned from the participating customer to installers. The participating customer receives the same value of the rebate through a reduced price of the qualifying energy efficient measure. The benefits of installing the energy efficient measure are realized irrespective of how the rebate is provided to the participating customer.

f. Identify how Evergy has accounted for installers as program Participants in the estimation of costs and benefits for the Cycle 4 programs.

Evergy has not differentiated between customers or installers as program participants in its Cycle 4 filing.

g. Why is this type of program participation necessary or reasonable in the context of MEEIA Cycle 4?

See response to (e).



- h. What level of participation for each program is expected to result in installers as the program Participant? Provide all support for the assumptions utilized to determine the values.

For the Business Energy Savings Program, the range of rebates reassigned to the installer has been 15-33% . The supporting information is noted above in 2(d).

- 3. Provide an explanation of all scenarios that may occur that results in a retailer being considered the program Participant.

With respect to this definition, it is considering that there could be a possibility that the incentive could be provided to the retailer as a reduction to the measure on behalf of the customer. This is also referred to as moving the incentive “mid-stream”. Evergy has not previously engaged with retailers to apply an incentive mid-stream for the business program.

- a. Define retailer as used in this definition.

This may include companies that sell the energy efficiency measures.

- b. What incentive, as defined on the same sheet, would be made available to such participants?

Because Evergy does not have any previous experience with engaging with retailers mid-stream, Evergy is uncertain about the specific rebate level; however, the rebate level would be within the approved incentive range.

- c. Identify the specific measures and the specific programs under which a retailer will be considered the program Participant.

At this time, Evergy has not identified any specific measures or programs that it would engage with a retailer.

- d. Identify the participation, by year, from 2018 through 2024, that a retailer was considered the program Participant including program, measure types, and incentives provided.

Evergy did not engage with any manufacturers during this period.

- e. Fully explain how Evergy ratepayers realize benefits from retailers as program Participants.

Similar to providing the rebate to installers as a pass through to the customer, customers value the immediate reduction in the cost of the measure rather than waiting for the rebate from Evergy and having to provide additional documentation of the installation of the measure.

- f. Identify how Evergy has accounted for retailers as program Participant in the estimation of costs and benefits for the Cycle 4 programs.

Evergy has not differentiated between customers or retailers as program participants in its Cycle 4 filing.

- g. Why is this type of program participation necessary or reasonable in the context of MEEIA Cycle 4?

See response to (e).

- h. What level of participation for each program is expected to result retailers as the program Participant? Provide all support for the assumptions utilized to determine the values.

This has been undetermined given that Evergy did not engage with retailers in prior MEEIA cycles to support business customers.

- i. Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.



No differences to note.

Information provided by: Natalie Gray, Manager DSM Energy Efficiency

Attachment(s):

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Missouri Metro
Case Name: 2023 MO Metro MEEIA Cycle 4
Case Number: EO-2023-0369

Requestor Luebbert J. -
Response Provided June 27, 2024

Question:0003

Please refer to the definition of “Program Administrator” included on page 3 of 109, Appendices 8.6 and 8.7 of the Application in this case (labeled P.S.C. MO. No. 1, 1st Revised Sheet No. R-74), which has been reproduced below for ease of reference: “Program Administrator - The entity selected by Company to provide program design, promotion, administration, implementation, and delivery of services.”

1. Identify the Program Administrator for each of the Evergy MEEIA Cycle 4 program proposals.
2. Fully explain the Program Administrator’s role in designing each Evergy MEEIA Cycle 4 program.
3. Fully explain the Program Administrator’s role in administering each Evergy MEEIA Cycle 4 program.
4. Fully explain the Program Administrator’s role in implementing each Evergy MEEIA Cycle 4 program.
5. Fully explain the Program Administrator’s role in delivery of services for each Evergy MEEIA Cycle 4 program.
6. Fully explain the Program Administrator’s role in evaluation of each Evergy MEEIA Cycle 4 program.
7. Fully explain the Program Administrator’s role in controlling the costs of each Evergy MEEIA Cycle 4 program.
8. Fully explain the Program Administrator’s role in setting incentive values for each measure of each Evergy MEEIA Cycle 4 program.
9. Fully explain Evergy’s role in designing each Evergy MEEIA Cycle 4 program, including names of Evergy employees that will be tasked with such responsibilities, position titles, and detail how the role of the Evergy employee differs from the responsibilities of the Program Administrator.
10. Fully explain Evergy’s role in administering each Evergy MEEIA Cycle 4 program, including names of Evergy employees that will be tasked with such responsibilities, position titles, and detail how the role of the Evergy employee differs from the responsibilities of the Program Administrator.
11. Fully explain Evergy’s role in implementing each Evergy MEEIA Cycle 4 program, including names of Evergy employees that will be tasked with such responsibilities, position titles, and detail how the role of the Evergy employee differs from the responsibilities of the Program Administrator.



12. Fully explain Evergy's role in delivery of services for each Evergy MEEIA Cycle 4 program, including names of Evergy employees that will be tasked with such responsibilities, position titles, and detail how the role of the Evergy employee differs from the responsibilities of the Program Administrator.
13. Fully explain Evergy's role in evaluation of each Evergy MEEIA Cycle 4 program, including names of Evergy employees that will be tasked with such responsibilities, position titles, and detail how the role of the Evergy employee differs from the responsibilities of the Program Administrator.
14. Fully explain Evergy's role in controlling the costs of each Evergy MEEIA Cycle 4 program, including names of Evergy employees that will be tasked with such responsibilities, position titles, and detail how the role of the Evergy employee differs from the responsibilities of the Program Administrator.
15. Fully explain Evergy's role in setting incentive values for each measure of each Evergy MEEIA Cycle 4 program, including names of Evergy employees that will be tasked with such responsibilities, position titles, and detail how the role of the Evergy employee differs from the responsibilities of the Program Administrator.
16. Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

- 1) At this time, we have not selected the Program Administrators for each of Evergy's MEEIA Cycle 4 programs.
- 2) The Program Design process involves comprehensive planning, analysis, and the establishment of incentive structures for programs included in Evergy's MEEIA Cycle 4 program. The Program Administrator acts as an expert in the subject matter, aiding Evergy's internal team in crafting programs. These programs concentrate on crucial factors such as pinpointing target measures and technologies for both short-term and long-term energy efficiency programming. They also focus on devising strategies that can enhance the impact of the program and strive to increase its cost-effectiveness.
- 3) The Evergy internal team carries the main administrative duties for the Evergy MEEIA Cycle 4 Programs. This includes overseeing the Program Administrator's deliverables when executing the activities of each program. The Program Administrator also supervises their Subcontractors and Program Partners, who are brought on board to help achieve goals of the programs.



- 4) – 5) To clarify, the terms ‘implementation’ and ‘delivery of services’ are used interchangeably when referring to the role of the Program Administrator in providing services for Evergy’s MEEIA Cycle 4 programs. Here is a breakdown of the roles involved in implementing and delivering services for each specific program under Evergy’s MEEIA Cycle 4:
- a. Whole Home Efficiency
 - i. **Home Products** – Evergy will engage a third-party implementation contractor (Program Administrator) to perform several duties including: establish / maintain relationships with manufacturers and retailers, provide in-store promotional materials and retail sales staff training, maintain a comprehensive online marketplace including energy-efficient equipment and appliances, where customers can browse and purchase qualifying measures, provide support for customer website troubleshooting, track program performance, including tracking sales data, reviewing sales data for accuracy and paying retailers, and periodically report progress towards program goals and opportunities for improvement
 - ii. **Appliance Recycling** – Evergy will engage a third-party implementation contractor (Program Administrator) to schedule recycling events, verify customer eligibility and appliance qualification, they will also hire a Program Partner to recycle/responsibly dispose of appliances, Implementer will also process customer rebates, track program performance, periodically report progress towards program goals and opportunities for improvement.
 - iii. **Home Comfort** – Evergy will engage a third-party implementation contractor (Program Administrator) to provide customer service support, establish relationships with local distributors and contractor/trade allies, review applications, verify customer eligibility, process rebate applications, and pay customer rebates, track performance, perform quality assurance/control, and periodically report progress towards program goals and opportunities for improvement.
 - iv. **Single Family and Multi Family New Construction** – Evergy will engage a third-party implementation contractor to engage and establish relationships with builders, developers, and energy raters, provide customer service support, process rebate applications, including application review and verification and rebate payment, track program performance and perform QA/QC, and periodically report program progress.
 - b. Home Energy Education
 - i. **Building Codes Training** – Evergy will engage a third-party implementation contractor to partner with a building code professional to provide current building code requirement training to our local builder network.
 - ii. **Market Influencer Training & Outreach** – Evergy will engage a third-party implementation contractor to support, along with internal Evergy



staff, to provide outreach to increase awareness of the advantages of energy efficiency and our rebates offered for new construction, rehab, and retrofit projects.

- c. Hard-to-Reach Homes
 - i. **Low Income Single & Multi Family and Moderate-Income Single Family** – Evergy will engage a third-party implementation contractor to identify and establish relationships with homeowners and multi-family building owners with income-eligible resident, engage customers and schedule appointments, track program performance and QA/QC, periodically report progress toward program goals, determine eligibility and ensuring eligible customers are aware of the available incentives from the utilities, assist in the application process for Evergy-only or joint utility projects, providing a seamless point of contact for navigating the various incentive offers provide by the Company and other utilities, maintaining a relationship with the trade ally network and providing information and guidance to assist them with the bid process for installation work, understanding and maintaining a network of assistance agencies, making referrals for financing and repairs, and seeking to remove barriers to participation, providing case studies and education and working with business development teams to ensure proper outreach is occurring, and coordinating marketing materials to provide an easy to understand process for participation.
 - ii. **Enhanced Home Products and Energy Savings Kits & Assessments** – Evergy will engage a third-party implementation contractor to organize and execute community events for low income customers and maintain a comprehensive online Offer Center to provide energy efficient items at no cost to targeted low income customers. Establish and maintain relationships with schools in low income areas within the service territory and distribute free school kits and educational materials, establish and maintain relationships with manufacturers, schedule and conduct energy assessments and create customized reports with personalized recommendations and cross promotion of other available programs, perform direct install of new energy efficient items, periodically report progress towards program goals and opportunities for improvement.
- d. Hard-to-Reach Homes Energy Education Program
 - i. **Market Influencer Training & Outreach** – Evergy will engage a third-party implementation contractor and support with internal Evergy staff to provide outreach to increase awareness of the advantages of energy efficiency and our rebates offered for new construction, rehab, and retrofit projects.
- e. Urban Heat Island (UHI) Mitigation
 - i. **UHI Mitigation Program** – Evergy will engage implementation contractors to engage with targeted communities, leverage other programs to perform energy assessments and direct installation of instant energy savings measures; provide a personalized report for best next steps related



to in-home and in-business energy efficiency improvement opportunities, along with details about UHI, implementation contractor may utilize and manage program partners to plant trees and manage distribution of trees, install other UHI mitigation measures, such as cool roofs and reflective paints, verify customer eligibility and review applications, provide customer service support, track program performance and conduct QA/QC

f. Business

Whole Business Efficiency

- i. **Business Comfort / Products / Operational / Custom / New Construction** – Evergy will engage a third-party implementation contractor (Program Administrator) to provide customer service support, establish relationships with local distributors and contractor/trade allies, builders, developers and energy raters. Also, review applications, verify customer eligibility, process rebate applications, and pay customer rebates, track performance, perform quality assurance/control, and periodically report progress towards program goals and opportunities for improvement.

g. Hard-to-Reach Business

- i. **Enhanced Business Comfort / Products / Operational / Custom** – Evergy will engage a third-party implementation contractor (Program Administrator) to provide customer service support, establish relationships with local distributors and contractor/trade allies, builders, developers and energy raters. Also, review applications, verify customer eligibility, process rebate applications, and pay customer rebates, track performance, perform quality assurance/control, and periodically report progress towards program goals and opportunities for improvement.
- ii. **Virtual Energy Management** – Evergy will engage a third-party implementation contractor to offer an energy management platform for qualifying customers, verify customer eligibility, provide customer service support, track program performance, and periodically report progress towards program goals and opportunities for improvement.
- iii. **Social Services** – Evergy will engage a third-party implementation contractor to complete energy assessments, develop customized recommendations for energy efficiency upgrades, and direct install applicable measures, support energy efficiency projects and offer one-on-one assistance to participants, process rebate applications, verify eligibility, review applications and issue customer rebates, conduct QA/QC to verify equipment installation, provide customer service support, track program performance, periodically report progress towards program goals and opportunities for improvement.
- iv. **No Cost Energy Assessment & Free Energy Savings Kit** – Evergy will engage a third-party implementation contractor to hire qualified, local individuals (or subcontract to qualifying companies) to conduct energy assessments and install qualifying measures, provide training as needed, verify customer eligibility and schedule energy assessments, provide



customer service support, track program performance, and periodically report progress toward program goals and opportunities for improvement.

- h. Business Energy Education
 - i. **Building Codes Training** – Evergy will engage a third-party implementation contractor to partner with a building code professional to provide current building code requirement training to our local builder network.
 - ii. **Market Influencer Training & Outreach** – Evergy will engage a third-party contractor and support with internal staff to increase awareness of the advantages of energy efficiency and our rebates offered for new construction, rehab, and retrofit projects.
- i. Demand Response
 - i. **Home Demand Response Program** – Evergy will engage a third-party implementer to provide necessary services to effectively implement the program and strive to attain targets.
 - ii. **Business Demand Response Program** – Evergy will engage a third-party program administrator to assist the internal product manager with program implementation, assist with customer identification, recruitment, and management, manage day-to-day operations, including control technology and support services, and recruit and manage AAP relationships.
- j. Demand Response Energy Education
 - i. **Demand Response Energy Education** – Evergy will engage a third-party program administrator to assist with internal marketing communications on Demand Response market intelligence in support of energy education. The program administrator will support areas including the following but not limited to, segmentation, demographics, propensity and price elasticity analysis, and device operability of existing end of life devices.

6) The Program Administrator’s role in the evaluation of each of Evergy’s MEEIA Cycle 4 programs is working with the Program Evaluator (EM&V) to comply with all requests needed for EM&V to conduct their evaluation of the programs, and work with the Program Evaluator on improvement recommendations for the program.

7) The Program Administrator’s role in cost control of each of Evergy’s MEEIA Cycle 4 programs is to ensure cost control measures that are put into place by Evergy staff are executed to ensure financial well-being of their associated programs.

8) The Program Administrator’s role in determination and setting of incentive values are to utilize their field expertise and knowledge to guide and assist Evergy staff on setting and determining of incentive levels that are in coordination with the overall program design for each of Evergy’s MEEIA Cycle 4 programs.

9) Evergy’s role in the Program Design process is to provide the overall strategy and direction to the Program Administrator and provide oversight and approval on the program design process that involves a comprehensive planning, analysis, and establishment of incentive structures for



programs. Evergy is responsible for final review and approval of the program design, while the Program Administrator is the subject matter expert aiding Evergy's internal staff in crafting programs. The program design concentrates on crucial factors such as pinpointing target measures and technologies for both short-term and long-term energy efficiency programming. The program design also focuses on devising strategies that can enhance the impact of the program and strive to increase its cost-effectiveness. Below are the anticipated internal Evergy staff that will have responsibilities of Evergy's MEEIA Cycle 4 Programs:

Whole Home Efficiency:

- Executive Oversight: Kimberly Winslow, Sr Director and Brian File, Director
- Management Oversight: Natalie Gray, Manager Products & Services
- Program Manager Responsibilities
 - **Home Products** – Zian Trober, Product Manager I
 - **Appliance Recycling** – Zian Trober, Product Manager I
 - **Home Comfort** – Jared Burton, Product Manager II
 - **Single Family New Construction** – Jared Burton, Product Manager II
 - **Multi-Family New Construction** – Jared Burton, Product Manager II

Home Energy Education:

- Executive Oversight: Kimberly Winslow, Sr Director and Brian File, Director
- Management Oversight: Natalie Gray, Manager Products & Services
- Marketing Management Oversight: Elizabeth Ruder, Manager Product Marketing
- Program Manager Responsibilities
 - **Building Codes Training** – Jared Burton, Product Manager II
 - **Market Influencer Training & Outreach** – Jared Burton, Product Manager II
 - **Customer Education** – Janelle Dobbins, Sr Marketing Manager

Hard-to-Reach Homes:

- Executive Oversight: Kimberly Winslow, Sr Director and Brian File, Director
- Management Oversight: Natalie Gray, Manager Products & Services
- Program Manager Responsibilities
 - **Low Income Single Family** – Donald Ealy, Product Manager II
 - **Low Income Multi Family** – Theresa English, Sr Product Manager
 - **Moderate Income Single Family On Bill Financing** – Jared Burton, Product Manager II
 - **Energy Savings Kits & Assessments** – Theresa English, Product Manager II
 - **Enhanced Home Products** – Zian Trober, Product Manager I
 - **Income Eligible Single Family New Construction** – Donald Ealy, Product Manager II
 - **Income Eligible Multi Family New Construction** – Theresa English, Sr Product Manager

Hard-to-Reach Homes Energy Education

- Executive Oversight: Kimberly Winslow, Sr Director and Brian File, Director
- Management Oversight: Natalie Gray, Manager, Products & Services

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- Marketing Management Oversight: Elizabeth Ruder, Manager Product Marketing
- Program Manager Responsibilities
 - **KC-LILAC** – Donald Ealy, Product Manager II
 - **Market Influencer Training & Outreach** – Theresa English, Sr Product Manager
 - **Customer Education** – Janelle Dobbins, Sr Marketing Manager

Urban Heat Island Mitigation (UHI)

- Executive Oversight: Kimberly Winslow, Sr Director and Brian File, Director
- Management Oversight: Natalie Gray, Manager Products & Services
- Program Manager Responsibilities
 - **Urban Heat Island Mitigation** – Zian Trober, Product Manager I

Whole Business Efficiency

- Executive Oversight: Kimberly Winslow, Sr Director and Brian File, Director
- Management Oversight: Natalie Gray, Manager Products & Services
- Program Manager Responsibilities
 - **Business Comfort** – Melody Knoch, Product Manager II
 - **Business Products** – Melody Knoch, Product Manager II
 - **Business Operational** – Melody Knoch, Product Manager II
 - **Business Custom** – Melody Knoch, Product Manager II
 - **New Construction** – Melody Knoch, Product Manager II

Hard-to-Reach Business

- Executive Oversight: Kimberly Winslow, Sr Director and Brian File, Director
- Management Oversight: Natalie Gray, Manager Products and Services
- Program Manager Responsibilities
 - **Enhanced Business Comfort** – Melody Knoch, Product Manager II
 - **Enhanced Business Products** – Melody Knoch, Product Manager II
 - **Enhanced Business Operational** – Melody Knoch, Product Manager II
 - **Enhanced Business Custom** – Melody Knoch, Product Manager II
 - **Virtual Energy Management** – Melody Knoch, Product Manager II
 - **Social Services** – Melody Knoch, Product Manager II
 - **No Cost Energy Assessment and Free Energy Savings Kit** – Melody Knoch, Product Manager II

Business Energy Education

- Executive Oversight: Kimberly Winslow, Sr Director and Brian File, Director
- Management Oversight: Natalie Gray, Manager Products & Services
- Marketing Management Oversight: Elizabeth Ruder, Manager Product Marketing
- Program Manager Responsibilities
 - **Building Operator Certification** – Melody Knoch, Product Manager II
 - **Local Business Energy Benchmarking** – Zian Trober, Product Manager I
 - **Building Codes Training** – Melody Knoch, Product Manager II
 - **Market Influencer Training & Outreach** – Melody Knoch, Product Manager II

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- **Customer Education** – Elizabeth Ruder, Manager Product Marketing

Pilots Program

- Executive Oversight: Kimberly Winslow, Sr Direct and Brian File, Director
- Management Oversight: Natalie Gray, Manager Products & Services
- Program Manager Responsibilities
 - **3D Printed Homes** – Zian Trober, Product Manager I
 - **Swimming Pools as Heat Sinks for AC/HP** – Zian Trober, Product Manager I
 - **Smart Panels** – Zian Trober, Product Manager I
 - **Real Time Energy Management Systems** – Zian Trober, Product Manager I
 - **Hard-to-Reach Business On-Bill Financing** – Jared Burton, Product Manager II

Home Demand Response

- Executive Oversight: Kimberly Winslow, Sr Director and Brian File, Director
- Management Oversight: Kevin Brannan, Sr Manager Products & Services
- Program Manager Responsibilities
 - **Home Demand Response** – Geoff Pratt, Product Manager II

Business Demand Response

- Executive Oversight: Kimberly Winslow, Sr Director and Brian File, Director
- Management Oversight: Kevin Brannan, Sr Manager Products & Services
- Program Manager Responsibilities
 - **Business Demand Response** – Chris DeLaTorre, Sr Product Manager

Demand Response Energy Education

- Executive Oversight: Kimberly Winslow, Sr Director and Brian File, Director
- Management Oversight: Kevin Brannan, Sr Manager Products & Services
- Marketing Management Oversight: Elizabeth Ruder, Manager Product Marketing
- Program Manager Responsibilities
 - **Demand Response Energy Education** – Elizabeth Ruder, Manager Product Marketing

10) Evergy’s function in the administration of its MEEIA Cycle 4 programs is to supervise, which includes managing the third-party Program Administrator/Implementer we have hired. This supervision encompasses overseeing the program design, budget management, performance tracking, cost-effectiveness assessments, partnerships, and customer incentives. The distinction between Evergy’s role and that of the Program Administrator lies in their responsibilities. The Program Administrator is tasked with implementing the program design, managing the budget, achieving performance targets, ensuring the programs maintain cost-effective ratios, and fostering partnerships and aiding in the creation of incentives. On the other hand, Evergy’s role is to provide administrative oversight of all these activities. In essence, while the Program Administrator is responsible for the execution of the program, Evergy ensures that everything is running smoothly and according to plan.

Please refer to the Evergy personnel in Response #9.



11 – 12) To provide some clarity, the phrases ‘implementation’ and ‘delivery of services’ is synonymous when discussing Evergy’s function within their MEEIA Cycle 4 Programs. The principal responsibility of Evergy in the execution and service provision is to employ a third-party Program Administrator/Implementer. This third-party is entrusted with spearheading the implementation tasks related to the MEEIA Cycle 4 programs. Meanwhile, Evergy’s role is to supervise, approve, and guide these activities. In essence, Evergy ensures the smooth operation of the programs by providing strategic direction and oversight.

Please refer to the Evergy personnel in Response #9.

13) In the evaluation of our MEEIA Cycle 4 program, Evergy’s role involves employing and collaborating with a third-party vendor specializing in Evaluation, Measurement, and Verification (EM&V). This vendor carries out a series of methods and procedures to evaluate the performance of Evergy’s MEEIA Cycle 4 programs. The primary goal is to measure the energy and demand savings and confirm whether our programs are achieving the anticipated level of savings. Evergy’s internal staff also cooperates with the Program Evaluator to examine suggestions for improvement based on the program’s performance. The Program Administrator’s role is to cooperate with and fulfill all requirements necessary for EM&V to evaluate the program, and to collaborate with the evaluator in implementing recommendations for program improvement.

Please refer to the Evergy personnel in Response #9

14) In managing the costs of each of Evergy’s MEEIA Cycle 4 programs, Evergy’s role is to exercise primary supervision and leadership in cost control. This includes setting clear goals related to budget management, which requires thoughtful allocation and monitoring of resources to ensure the program operates within its budget. On the other hand, the Program Administrator’s role is to ensure that cost control measures established by Evergy staff are implemented effectively to maintain the financial health of their respective programs.

Please refer to the Evergy personnel in Response #9

15) When it comes to determining the incentive values for each measure of Evergy’s MEEIA Cycle 4 program, Evergy’s role is to steer and approve the incentive levels. This is done with the assistance and input from the Program Administrator, who brings their field knowledge and analytical models to the table. The Program Administrator’s role, on the other hand, is to perform an analysis and offer advice on setting incentive levels, leveraging their expertise in the field.

Please refer to the Evergy personnel in Response #9

16) Notable difference between MO West and MO Metro is pertained to the Urban Heat Island, this program will only be available in MO Metro. No other notable differences between the two jurisdictions.



Information provided by: Jared Burton, Energy Efficiency Program Manager

Attachment(s):

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Missouri Metro
Case Name: 2023 MO Metro MEEIA Cycle 4
Case Number: EO-2023-0369

Requestor Luebbert J. -
Response Provided June 27, 2024

Question:0004

Please refer to the definition of “Program Partner” included on page 3 of 109, Appendices 8.6 and 8.7 of the Application in this case (labeled P.S.C. MO. No. 1, 1st Revised Sheet No. R-74), which has been reproduced below for ease of reference: “Program Partner - A retailer, distributor or other service provider that Company or the Program Administrator has approved to provide specific program services through execution of a Company approved service agreement.” 1. Define “program services” as used in the Program Partner definition. 2. Fully describe the extent of “program services” that may be rendered by a “retailer, distributor, or other service provider” for each Evergy MEEIA Cycle 4 program. 3. Describe all circumstances that will require a “Program Partner” to provide “program services” beyond the capability of Evergy or the “Program Administrator” as defined on the same page. 4. Explain all differences between the role of a Program Partner, Program Administrator, and Evergy in providing program design, promotion, administration, implementation, delivery of services, program evaluation, program cost control, and setting incentive values for program measures. 5. Define “retailer” as used in the Program Partner definition. 6. Define “distributor” as used in the Program Partner definition. 7. Define “other service provider” as used in the Program Partner definition. 8. Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

- 1) Program Services, in the context of a Program Partner’s role, refers to the tasks performed by these Partners. The range of services provided by these partners vary based on the program and their specific trade, but examples include HVAC and Weatherization contractors who participate in our Whole Home and Whole Business rebate program who complete the installation of the Evergy-rebated energy efficiency measures for the customers. In addition, Retailers also provide Program Services by offering energy efficient products with an Evergy discount applied for customer purchase.



2) Below is the program services that may be rendered by program partners per the program design:

Residential

Whole Home Efficiency

- **Home Products** – Retailers offer instant discounts in brick-and-mortar stores, also maintain a comprehensive online marketplace including discounted energy-efficient equipment and appliances.
- **Appliance Recycling** – Appliance Recycling Company will support recycling events and recycle/responsibly dispose of appliances.
- **Home Comfort** – HVAC installation contractors educate customer on available Evergy incentives and provide application to Evergy on behalf of customer. Local distributors assist with education and recruitment of installation contractors, along with Energy Auditors who educate customers on available Evergy incentives and provide applications to Evergy on behalf of the customers.
- **Single Family and Multi Family New Construction** – Builders build more efficient homes and educate customers on advantages, submit rebate applications, Developers are also important channels for buy-in for having homes in subdivisions be built more energy efficiently, along with Energy Raters that may perform the energy auditing.

Home Energy Education

- **Building Codes Training** – Building Code Professional to provide current building code requirement training to our local builder network.
- **Market Influencer Training & Outreach** – Collaboration with Builders, Developers, Energy Raters and Realtors and others to be program advocates.

Hard-to-Reach Homes

- **Low Income Single & Multi Family and Moderate-Income Single Family** – Builders build more efficient homes and educate customers on advantages, submit rebate applications, Developers are also important channels for buy-in for having homes in subdivisions be built more energy efficiently, along with Energy Raters that may perform the energy auditing. In addition to guidance to assist them with the bid process for installation work, understanding and maintaining a network of Assistance Agencies.
- **Enhanced Home Products and Energy Savings Kits & Assessments** – n/a

Hard-to-Reach Homes Energy Education Program

- **Market Influencer Training & Outreach** – Collaboration with Builders, Developers, Energy Raters and Realtors and others to be program advocates.

Urban Heat Island (UHI) Mitigation

Urban Heat Island



- **UHI Mitigation Program** –Tree Planting and Maintenance Partner will plant trees and manage distribution of trees, along with other Contractors to install other UHI mitigation measures, such as cool roofs and reflective paints.

Business

Whole Business Efficiency

- **Business Comfort / Products / Operational / Custom / New Construction** – HVAC installation contractors and other Contractors such as Lighting Installers will educate customer on available Evergy incentives and provide application to Evergy on behalf of customer. Local distributors assist with education and recruitment of installation contractors. Builders build more efficient homes and educate customers on advantages, submit rebate applications, Developers are also important channels for buy-in for having businesses be built more energy efficiently, along with Energy Raters that may perform the energy auditing.

Hard-to-Reach Business

- **Enhanced Business Comfort / Products / Operational / Custom** – HVAC installation contractors and other Contractors such as Lighting Installers will educate customer on available Evergy incentives and provide application to Evergy on behalf of customer. Local distributors assist with education and recruitment of installation contractors. Builders build more efficient homes and educate customers on advantages, submit rebate applications, Developers are also important channels for buy-in for having businesses be built more energy efficiently, along with Energy Raters that may perform the energy auditing.
- **Virtual Energy Management** – Partner Contractor to install and manage the VEM systems, along with providing the app to view and manage energy usage. Along with providing recommendations for improved usage opportunities.
- **Social Services** – HVAC installation contractors and other Contractors such as Lighting Installers will install these energy efficient measures and provide application to Evergy on behalf of customer.
- **No Cost Energy Assessment & Free Energy Savings Kit** – n/a

Business Energy Education

- **Building Codes Training** – Evergy will engage a third-party contractor to provide current building code requirement training to our local builder network.
- **Market Influencer Training & Outreach** – Collaboration with Builders, Developers, Energy Raters and Realtors and others to be program advocates.

Demand Response

Demand Response



- **Home Demand Response Program** – Evergy will engage a third-party contractor to provide an online marketplace channel for new device acquisition and pre-enrollment in the Company’s home demand response program through a single transaction point.
- Evergy will partner with OEM Device Manufacturers to drive awareness and acquisition of existing device owners through the Company’s bring your own device (“BYOD”) channel.
- **Business Demand Response Program** – Evergy will engage a third-party contractor to provide outreach and engagement to customers and market actors to drive enrollment and performance of enrolled capacity.

Demand Response Energy Education

- **Demand Response Energy Education** –
- **Home Demand Response Training & Outreach** – The Company will engage a third-party contractor to provide broad market awareness, targeted customer and market actor engagement on the value of demand response as a load flexibility resource for the community.
- **Building Demand Response Education** – Evergy will engage a third-party contractor to provide commercial and industrial customers with a network, extensive training and co-hort support for their facilities engagement in load flex solutions.

3) In order to delineate the responsibilities of a Program Partner and the services they are expected to deliver, its important to first distinguish that a Program Administrator is defined as a Third-Party Implementer that is hired by Evergy to manage the day-to-day operations of the programs under the supervision and management of an internal Evergy Program Manager. A Program Administrator/Third Party Implementer has the authority subject of approval by the internal Evergy Program Manager to hire and/or outsource to a Program Partner to achieve the needed goals of the Program. Noted in the answers previously, in Question 2, you will find the anticipated services that a Program Partner will provide that cannot be achieved directly by internal Evergy staff and/or Program Administrator.

4) Outlined below are the respective roles and responsibilities of Evergy, the Program Administrator, and the Program Partner in relation to program design, promotion, administration, implementation, service delivery, program evaluation, cost control of the program, and determination of incentive values for program measures:

- **Evergy’s Roles and Responsibilities:** Internal Evergy staff provide leadership and direction on all associated tasks of program design, administration, implementation, service delivery, program evaluation, cost control, and determination of incentive values for the MEEIA Cycle 4 programs.
 - **Program Design:** Internal Evergy staff sets the direction and provides oversight in the creation of the Program Design, with input and field



expertise from hired third-party Program Administrator to set clear objectives, identifying target markets, and outlining the strategies to achieve program goals.

- **Promotion:** Internal Evergy staff sets the direction and primary duty of promotional activity related to its' marketing and customer outreach for its MEEIA Cycle 4 programs and receives input and guidance from Program Administrator based on their field expertise.
- **Administration:** Internal Evergy staff has administrative oversight of the MEEIA cycle 4 programs, including management of the hired third-party Program Administrator/Implementer, which includes oversight of program design, budget management, performance monitoring, cost-effective evaluations, partnerships, and customer incentives.
- **Implementation / Service Delivery:** Internal Evergy staff hires the third-party Program Administrator to lead the implementation activities associated with its MEEIA Cycle 4 programs, providing oversight, approval, and direction.
- **Program Evaluation:** Internal Evergy staff hires and works alongside a third-party Evaluation, Measurement, and Verification contractor who conducts a collection of methods and processes used to assess the performance of Evergy's MEEIA Cycle 4 programs with the main objective to measure the energy and demand savings and verify if our program is generating the expected level of savings. Internal Evergy staff also work alongside the Program Evaluator to review improvement recommendations based on program performance.
- **Cost Control:** Internal Evergy staff have primary oversight and leadership over cost control includes setting clear objectives including budget management that involves careful allocation and tracking of resources to ensure that the program is operating within its financial means.
- **Determination of Incentive Values:** Internal Evergy staff sets the direction and approval on incentive levels, with guidance and input from Program Administrator based on their field expertise.

- **Program Administrators Roles and Responsibilities**

- **Program Design:** Program Administrator provides input and guidance on the creation of the Program Design based on their field expertise to Evergy, and then has responsibility for execution of the Program Design, once approved by Evergy.
- **Promotion:** Program Administrator executes the direction and promotional activity set forth by Evergy and provides input and recommendations on strategy.



- **Administration:** Program Administrator has administrative oversight on their sub-contractors, or Program Partners that are involved in Evergy's MEEIA Cycle 4 program.
- **Implementation / Service Delivery:** Program Administrator is responsible for execution of all implementation and service delivery tasks assigned to them by internal Evergy staff.
- **Program Evaluation:** Program Administrator is responsible for working with the Program Evaluator to comply with all requests needed for EM&V to conduct their evaluation of the program, and work with evaluator on improvement recommendations for the program.
- **Cost Control:** Program Administrator works to ensure cost control measures are put in place by internal Evergy staff and ensure financial well-being of their associated programs.
- **Determination of Incentive Values:** Program Administrator provides input and guidance on the determination of incentive values based on their field expertise.

- **Program Partners Roles and Responsibilities**

- **Program Design:** Program Partner has no direct responsibility on Program Design.
- **Promotion:** Program Partner works to promote Evergy's MEEIA Cycle 4 Programs.
- **Administration:** Program Partner has no direct responsibility on Administration.
- **Implementation / Service Delivery:** Program Partner works to execute implementation activities assigned by Evergy or Program Administrator to achieve program goals.
- **Program Evaluation:** Program Partner has no direct responsibility on Program Evaluation.
- **Cost Control:** Program Partner has no direct responsibility on Cost Control.
- **Determination of Incentive Values:** Program Partner has no direct responsibility on determination of incentive values.

- 5) Retailer is defined as a business entity that partners with the MEEIA Cycle 4 programs to promote and sell qualified energy efficient products through Evergy's Home Products programs, and has agreed to incorporate Evergy's rebates at point of sale.
- 6) Distributor is defined as a business entity that supplies energy efficient products to retailers or contractors that are involved within Evergy's MEEIA Cycle 4 programs.



- 7) Other Service Providers as outlined in Evergy's MEEIA Cycle 4 programs can be, but not limited to building codes professionals, energy raters, energy auditors, Appliance Recycling professionals, builders, developers, etc.

Notable difference between MO West and MO Metro is pertained to the Urban Heat Island, this program will only be available in MO Metro. No other notable differences between the two jurisdictions.

Information provided by: Jared Burton, Energy Efficiency Program Manager

Attachment(s):

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Missouri Metro
Case Name: 2023 MO Metro MEEIA Cycle 4
Case Number: EO-2023-0369

Requestor Luebbert J. -
Response Provided June 27, 2024

Question:0006

Please refer to the “Standard Rebates” description on page 7 of 109, Appendices 8.6 and 8.7 of the Application in this case (labeled P.S.C. MO. No. 1, 1st Revised Sheet No. R-78).

1. Fully describe the “pre-qualified list” that is referenced on the sheet.
2. Provide the existing “pre-qualified list” for Evergy MEEIA Cycle 3 and note any changes that are expected for MEEIA Cycle 4.
3. How will the “pre-qualified list” be provided to ratepayers, the Commission, and Commission Staff?
4. How often will the “pre-qualified list” be subject to change?
5. Fully describe the change process to the “pre-qualified list” including, but not limited to: notice provided to the Commission, Commission Staff, ratepayers, Program Administrators, and Program Partners; level of detail that will be provided to each aforementioned party; whether feedback will be requested from the aforementioned party prior to changes; and how feedback from aforementioned parties will be incorporated prior to changes to the list.
6. How will Evergy, or the Program Administrator, limit free-ridership of equipment installations that receive Standard Rebates?
7. Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

1. Fully describe the “pre-qualified list” that is referenced on the sheet.
Please see Appendix 8.2 Evergy TRM MEEIA 2024-01-01_Public.xlsm’ provided in this filing.
2. Provide the existing “pre-qualified list” for Evergy MEEIA Cycle 3 and note any changes that are expected for MEEIA Cycle 4.
Attached is the existing “pre-qualified list” or “Standard Incentives” for Evergy MEEIA Cycle 3, which can also be found on [Evergy.com](https://www.evergy.com) business site. New measures Evergy is

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proposing for MEEIA Cycle 4 can be found in the ‘Appendix 8.2.1’ that was included with the filing.

3. How will the “pre-qualified list” be provided to ratepayers, the Commission, and Commission Staff?

Evergy provided the existing TRM and TRM with new measures for MEEIA Cycle 4 as Appendix 8.2 and 8.2.1, respectively, in the current filing. Once approved, Evergy posts the measures on its website (evergy.com).

4. How often will the “pre-qualified list” be subject to change?

The frequency of changes to the “pre-qualified list” is typically reviewed and updated on an annual basis.

5. Fully describe the change process to the “pre-qualified list” including, but not limited to: notice provided to the Commission, Commission Staff, ratepayers, Program Administrators, and Program Partners; level of detail that will be provided to each aforementioned party; whether feedback will be requested from the aforementioned party prior to changes; and how feedback from aforementioned parties will be incorporated prior to changes to the list.

The change process to the “pre-qualified list” involves a formal approval process by the Commission prior to any addition of new measures. Once approved, notice of changes would be provided to all parties involved, including the Commission, Commission Staff, ratepayers, Program Administrators, and Program Partners. The level of detail provided would include the rationale for changes and the impact on rebate eligibility.

6. How will Evergy, or the Program Administrator, limit free-ridership of equipment installations that receive Standard Rebates?

To limit free ridership of equipment installations that receive Standard Rebates, Evergy or the Program Administrator may use methods such as customer surveys, market data analysis, and tracking of sales trends to estimate the net-to-gross ratio. This is to ensure that rebates are driving additional energy efficiency actions rather than rewarding actions that would have occurred without the incentive.

7. Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

There are no differences in the applicability of data requests and responses for Evergy Missouri Metro and Evergy Missouri West Evergy.

Information provided by: Melody Knoch, Program Manager – Business Energy Efficiency

Attachment(s): Q0006_Evergy MEEIA III Standard Incentives Brochure (Business)



Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Missouri Metro
Case Name: 2023 MO Metro MEEIA Cycle 4
Case Number: EO-2023-0369

Requestor Luebbert J. -
Response Provided June 27, 2024

Question:0007

Please refer to the “Custom Rebates” description on page 8 of 109, Appendices 8.6 and 8.7 of the Application in this case (labeled P.S.C. MO. No. 1, 1st Revised Sheet No. R-79). 1. How will energy and demand savings estimates for custom equipment be calculated? 2. How will custom rebate incentive amounts be determined? 3. How will Evergy, or the Program Administrator, limit free-ridership of equipment installations that receive Custom Rebates? 4. Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

1. Energy and demand savings estimates for custom equipment is typically calculated using custom measure-specific engineering calculations showing detailed energy and demand savings calculations and methodologies based on industry-accepted and sound engineering principles and practices. These calculations would take into account the specific characteristics of the custom equipment and the expected performance improvements.
2. Custom rebate incentive amounts are typically determined by the estimated first-year energy savings when completing energy efficiency or renewable energy upgrades to equipment or processes. The method and assumptions used by the applicant to calculate the annual savings will be reviewed as part of the pre-approval process, and final determination of the annual energy savings used in calculating the incentive amount is the responsibility of the program administrator.
3. To limit free ridership of equipment installations that receive custom rebates, Evergy or the Program Administrator may use methods such as customer surveys, market data analysis, and tracking of sales trends to estimate the net-to-gross ratio. For Custom projects we will ensure that the incentive is based on the difference in savings between the minimum code baseline and what is actually installed. Therefore, we incentivize customers that go above local and state required efficiency levels. This approach ensures



that rebates are driving additional energy efficiency actions rather than rewarding actions that would have occurred without the incentive.

4. There are no differences in the applicability of data requests and responses for Evergy Missouri Metro and Evergy Missouri West Evergy.

Information provided by: Melody Knoch, Program Manager – Business Energy

Attachment(s):

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Missouri Metro
Case Name: 2023 MO Metro MEEIA Cycle 4
Case Number: EO-2023-0369

Requestor Luebbert J. -
Response Provided June 27, 2024

Question:0005

Please refer to the “Programs’ Annual Energy and Demand Savings Targets” table on page 5 of 109, Appendices 8.6 and 8.7 of the Application in this case (labeled P.S.C. MO. No. 1, 1st Revised Sheet No. R-76).

- Fully explain the estimation of Business Demand Response energy savings targets.
- Does the estimation account for load increases prior to events or after events?
- If so, thoroughly explain and provide support for all assumptions to estimate the effects of pre-event and post-event load increases on the calculation of energy reductions.
- If not, please explain why Evergy has not included the effects of pre-event and post-event energy usage.
- Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

Fully explain the estimation of Business Demand Response energy savings targets.

- *The Advanced Demand Control savings are attributed to energy management systems. The energy savings per unit were sourced from the Xcel Colorado 2021-2022 DSM Plan.*
- https://www.eebco.org/resources/Documents/MEMBERS%20ONLY/XCEL%20ENERGY/Xcel%20Energy%20CO_2021-22_DSM_Plan_Final.pdf
- *The Business Demand Response thermostat energy savings are sourced from the MEEIA Cycle III: Residential & Demand Response Measurement, and Verification Report, 2021 (see Table 6-30).*

Does the estimation account for load increases prior to events or after events?

- *The MEEIA Cycle III EM&V report accounts for load increases.*

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If so, thoroughly explain and provide support for all assumptions to estimate the effects of pre-event and post-event load increases on the calculation of energy reductions.

- *The thermostat energy savings are based on the Company's evaluated program savings using a linear fixed effects regression model.*

If not, please explain why Evergy has not included the effects of pre-event and post-event energy usage.

- *n/a*

Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

- *There are no differences in between the savings sources for the Company's Missouri Metro and Missouri West service territories.*

Information provided by: Kevin Brannan, Sr. Manager, DER Products & Services

Attachment(s):

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Missouri Metro
Case Name: 2023 MO Metro MEEIA Cycle 4
Case Number: EO-2023-0369

Requestor Luebbert J. -
Response Provided June 27, 2024

Question:0008

Please refer to the following language included on page 9 of 109, Appendices 8.6 and 8.7 of the Application in this case (labeled P.S.C. MO. No. 1, 1st Revised Sheet No. R-80): “The Company will determine the most beneficial timing and length of curtailment events during the curtailment season... The Company also reserves the right to apply minimum and/or maximum event performance requirements for incentive payment, to apply financial bonuses or penalties and to terminate Participation Agreements for non-compliance. The Company reserves the right to curtail some or all Participants year-round if needed. This off-season curtailment would be utilized during emergency situations locally or regionally. Off-season participation is voluntary with participant payment at the discretion of the Company outlined in the Participation Agreements...”

1. Fully describe how the Company will determine the “most beneficial timing and length of curtailment events during the curtailment season”.
2. Identify and quantify the “minimum and maximum event performance requirements” and explain why these requirements are necessary and reasonable.
3. Identify and quantify the “financial bonuses or penalties” and explain how these will be determined. Provide all formulas that will be used to determine each aforementioned financial bonus or penalty.
4. Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

1. The Company will determine the most beneficial timing and length of curtailment events during the curtailment season through a daily review of load forecasts, location marginal prices (LMP), local grid and RTO operation conditions. In addition, the Company will



utilize a weekly internal call with Evergy program stakeholders to evaluate several factors including but not limited to; (1) Weekly Load Forecast for each Evergy operating company reflecting the loads by day and hour ending, (2) Seven day weather forecast by territory, (3) Southwest Power Pool load forecast availability, (4) current and forecasted (local/regional) grid and/or emergency status, (5) weekly forecast comparison to monthly and annual IRP forecast by territory, (6) current dispatchable capacity available, (7) number of DR events dispatched to date by program asset, (8) number of calls remaining by asset, (9) has the monthly and/or annual peak been offset and (10) customer fatigue.

2. The minimum performance requirement for each customer is an average of 40% achievement of their committed curtailable load (kW), across all committed events throughout the season. This minimum performance requirement is necessary to ensure that customers are appropriately incentivized to: 1) make realistic commitments of their curtailable load at the outset of the season, as these commitments serve as key resource planning and operational decision-making inputs until they can be trued up with measurement and verification throughout the season; and 2) perform to the best of their capability during all committed events in order to support the stability of the grid during constrained conditions. The Company's experience implementing Business Demand Response over the past several years has supported 40% as a minimum threshold value that support the planning and reliability value of the program, while also providing reasonable assurance to customers to not dissuade from program participation. At the conclusion of each event the Company actively reviews performance with each participant and at the end of the season updates curtailment agreements and customers to ensure program performance supports peak mitigation, reliability and costs savings to all customers.
 - i. The maximum performance requirement for each customer is an average of 110% achievement of their committed curtailable load (kW) across all committed events throughout the season. The maximum performance requirement is designed – similar to the minimum performance requirement – to appropriately incentivize customers to make achievable commitments of their curtailable load at the outset of the season. Absent this cap on performance payments for a participant's over-achievement of their committed curtailable load, the Company would risk an incentive structure that motivates participants to under-represent their commitment and over-achieve during events. Any under-representation of committed curtailable load would reduce the planning value of the program and would reduce the reliability of the inputs utilized for operational decision-making during times of constrained grid conditions. The Company has found that a 110% cap on performance payments provides the necessary incentives to support the planning and reliability value of the program, while also providing reasonable opportunity for participants to earn incentives for over-performance.



3. The Company offers program participants three financial bonus opportunities, limited to an additional 5% of the participant's base performance payment. The bonus opportunities are intended to assess participants' capabilities and willingness to participate with:
 - Extended event duration (2%),
 - Direct load control (1.5%),
 - and reduced notification period (1.5%).

Participants' qualification for these bonus categories will be determined based on: 1) their indication of the capability on their participation agreement; 2) their participation in a standardized bonus capability assessment conducted by the program administrator to reasonably assess each participant's capability to deliver the bonus category indicated on their agreement; and 3) the participant's actual delivery of the bonus capability if specifically called upon throughout the season.

The objective of the bonus structure is to support curtailment capabilities for resource planning and performance.

The formula utilized to determine the bonus payment for a participant capable of one or more bonus categories is: $\text{Base Performance Payment} \times \% \text{ Qualified Bonus (1.5-5\%)} = \text{Bonus Payment}$.

- i. Participants may also incur deductions to their incentive payment for non-performance – capped at 5% of each participant's base performance payment. These deductions would be incurred by participants who fail to deliver their committed curtailable load within either or both of the following parameters: no less than 80% of contracted capacity delivered per committed event (2.5%), and no greater than 2 committed events with less than 40% curtailment achieved (2.5%). The formula utilized to determine the non-performance deductions is: $\text{Base Performance Payment} \times \% \text{ Deduction (2.5-5\%)} = \text{Deduction}$. As program needs evolve, the Company may modify these limited deductions in future program years.
4. Responses to all subparts of this data request are applicable to both Evergy Missouri Metro and Evergy Missouri West.



Information provided by: Kevin Brannan, Sr. Manager, DER Products & Services

Attachment(s):

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs

Case Nos. EO-2023-0369 / EO-2023-0370

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Case Nos. EO-2023-0369 / EO-2023-0370

SCHEDULE JL-r1

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Case Nos. EO-2023-0369 / EO-2023-0370

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Evergy Missouri Metro
Case Name: 2023 MO Metro MEEIA Cycle 4
Case Number: EO-2023-0369

Requestor Luebbert J. -
Response Provided June 27, 2024

Question:0012

Please refer to the language included on pages 12 of 109, Appendices 8.6 and 8.7 of the Application in this case (labeled P.S.C. MO. No. 1, 1st Revised Sheet No. R-83).

1. Identify all “various demand response technologies” that will be implemented through this program.
2. Provide the costs of each “demand response technologies” including comparisons of costs that will be booked to the program versus the program participant.
3. What end-uses will be modified as part of this program?
4. How will demand reductions of each end-use be measured as part of this program?
5. Provide detailed explanations of how Evergy will account for potential pre-event and post-event energy usage increases associated with this program, and provide all formulas that will be utilized to estimate or measure the aforementioned energy usage.
6. Describe the process(es) that Evergy will employ to ensure that the “WiFi enabled connected device(s)” will be installed within the specified time period and maintain connection for the “duration of the program Cycle.”
7. Identify the “minimum and/or maximum event performance requirements for incentive payment” applicable to this program and explain how these will be calculated including formulas.
8. Identify the “financial penalties” applicable to this program and explain how these will be calculated including formulas.
9. How will “non-compliance” be determined for program participation?
10. Fully describe how Evergy will determine whether to apply: a. “minimum and/or maximum event performance requirements for incentive payment” applicable to this program; b. financial penalties; and c. participation termination for non-compliance
11. Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.



Response:

1. The program will consist of smart thermostats and advanced automation controls for building management systems.
2. Demand Response technology costs for smart thermostats will range by OEM from approximately \$150- \$250 per device and for smart building controls approximately \$2.50-\$7.00 per controlled sqft.
3. End uses that will be modified will include HVAC, lighting, smart appliances and other ancillary systems that can be controlled via building management or end point system operability with gateway devices for dispatchability.
4. Demand reductions associated with each Business Demand Response (BDR) program end-use will be measured using a calculated baseline load (CBL) methodology. The CBL approach involves comparing a participant's load shape during a demand response event with a baseline load shape.

Program tracking data, 15-minute interval meter AMI data for participating customers, the full schedule of BDR program events, and weather data from NOAA are used to produce a baseline load shape and thereby assess demand reductions associated with the BDR program. The first step in the CBL methodology is selecting an appropriate baseline load shape. To do so, the evaluators will apply different inclusion criteria to eligible days prior to the event day (evaluators refer to these days as the "lookback window"). The evaluators test various lookback window lengths (e.g., normally between 5 and 10 days) and then select a subset of those days to create potential baseline loads. The lookback window can be subset based on day type (e.g., any weekday vs. same day of week), number of days, and hours of the day used to determine baseline day selection. Once raw baseline loads are determined based on inclusion criteria, the evaluators can then apply a variety of adjustments to the load to more closely match it to event day usage. These adjustments include usage based – multiplicative, usage based – additive, and weather based.

The evaluators develop a variety of potential baseline loads for each participating customer, and then compare those loads to the event window (i.e., 12-8 PM) during proxy event days. Proxy event days are non-holiday weekdays with the highest system usage where no DR event was called. Each potential baseline load is compared to these proxy event days and the residual root mean squared error (RRMSE) is calculated. The RRMSE is a measure of the difference between each customer's actual demand during proxy event days and the demand predicted by the adjusted baseline load. The best three baseline load models are selected for each participating customer, and the inverse square of the RRMSEs is used as a weight to produce a weighted average baseline load. For example, of three models having RRMSEs of 5 percent, 11 percent, and 52 percent respectively, their relative weights will be 82 percent, 17 percent, and 1 percent, respectively.



Once a weighted average baseline load is determined for each customer, demand reduction is calculated by subtracting actual hourly usage during an event from the calculated CBL baseline. Lastly, as necessary, the evaluators then aggregate customer-specific demand reduction results by end-use, device type, location, and program.

- Annual energy savings for DR customers will be estimated using a weather-adjusted Post Period Regression (PPR) ordinary least-squares (OLS) model. A matched comparison group will be created using a Propensity Score Matching (PSM) approach. With the PSM approach, a propensity score is estimated for treatment customers (i.e., those who received program services) and a group of customers who did not receive program services using a logit model. Customers in the treatment and control groups are matched based on seasonal pre-period usage (e.g., summer, spring, fall, and winter) and zip code (or other factors such as rate code). In addition, demand response event days are removed from the data to avoid creating bias.

Control group customers will be selected from customers who have not participated in any demand response or energy efficiency programs. In addition, the PPR model will utilize post period data only. After creating a matched comparison group, the program impacts are estimated with the following regression. The final form of the model is shown below.

Equation 1: RDR Final Model

$$Usage (kWh)_{it} = \alpha_0 + \sum_{m=1}^{12} \alpha_m Month_{m,t} * \sum_{p=1}^4 \alpha_p Pre - Period Usage_{p,it} + \beta_1 * Treatment_{it} + \beta_2 * HDH_{it} + \beta_3 * CDH_{it} + \beta_4 * Treatment_{it} * HDH_{it} + \beta_5 * Treatment_{it} * CDH_{it} + \epsilon_{it}$$

Where:

- α_0 = intercept term
- t = index for the time interval
- i = index for the customer
- m = index for month of the year
- p = index for season of the year (spring, summer, fall, winter)
- $Month$ = dummy variable for month of the year
- $Pre-Period Usage$ = average pre-period usage for season p (spring, summer, fall, winter) for customer i
- $Treatment$ = dummy variable



	<i>= 1 if in the treatment group, and 0 otherwise</i>
HDH_{it}	<i>= average heating degree hours for time interval t</i>
CDH_{it}	<i>= average cooling degree hours for time interval t</i>
ϵ_{it}	<i>= error term</i>
α, β	<i>= parameters to be estimated by the model. $\beta_1, \beta_4,$ and β_5 are the parameters of interest for estimating the reduction in kWh usage</i>

The total annual energy savings (kWh) for the program is calculated by taking the estimated kWh savings/unit and multiplying by the number of eligible units considered part of the demand response program in each program year.

6. Customers that acquire a Wi-Fi enabled DLC device from the Company's Marketplace will receive a series of email reminders over a span of 90 days with a reminder that any financial incentives received are contingent upon completing the installation process for the Wi-Fi enable DLC device.
7. The Company has outlined curtailment parameters of any weekday, Monday through Friday excluding Independence and Labor Day holiday and any day during an Energy Emergency Alert (EEA) Level 2 or greater officially designated as such.

Program parameters provide year-round flexibility to dispatch events for peak reduction, emergency events (local grid & SPP RTO) and locational dispatch needs while balancing impacts to customer on a maximum of one event per day.

Minimum and maximum event performance requirements are necessary and reasonable in that they balance the dispatch flexibility of the resource to provide operational relief to the grid and savings impacts to participants and non-participants of the program.

8. Customers that fail to install their Wi-Fi enabled DLC device within 90 days will be subjected to a credit card charge back equal to the financial incentive they received when the Wi-Fi enabled DLC device was acquired from the Company's Marketplace.
9. The Company will determine non-compliance if the customer has made no response to the Company's recurring reminders that will occur over the 90-day period following purchase. Should the Company not receive a response from the customers intent to comply the Company will charge the customer back for the incentive provided at the point of sale consistent with the program terms and conditions terminating the customers enrollment in the program.
10. The Company has proposed performance requirements to balance the dispatch flexibility of the resource to provide grid support and operational savings for participants and non-



participants while ensuring the resource does not fatigue participants causing unintended consequences and program churn.

A maximum of one event per device per day per participant and up to two hundred hours per device per year has been established. Non-participation in 40% of the hours and/or events would flag the participant for review and determination whether the participant will remain in the program for future incentive opportunities.

11. Responses to all subparts of this data request are applicable to both Evergy Missouri Metro and Evergy Missouri West.

Information provided by: Kevin Brannan, Sr. Manager, DER Products & Services

Attachment(s):

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Missouri Metro
Case Name: 2023 MO Metro MEEIA Cycle 4
Case Number: EO-2023-0369

Requestor Luebbert J. -
Response Provided June 28, 2024

Question:0014

Please refer to the language included on pages 14 of 109, Appendices 8.6 and 8.7 of the Application in this case (labeled P.S.C. MO. No. 1, 1st Revised Sheet No. R-85).

1. How will Evergy determine the timing and duration of a “curtailment event”?
2. Identify the “assignees” that will have control of curtailment devices.
3. How will Evergy determine whether or not to “curtail all Participants simultaneously” or “stagger curtailment events across Participants.”
4. Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

1. The Company will utilize a weekly internal call with Evergy program stakeholders to evaluate several factors to determine which programs are utilized and for what duration an event may be called. Factors include but are not limited to; (1) Weekly Load Forecast for each Evergy operating company reflecting the loads by day and hour ending, (2) Seven day weather forecast by territory, (3) Southwest Power Pool load forecast availability, (4) current and forecasted (local/regional) grid and/or emergency status, (5) weekly forecast comparison to monthly and annual IRP forecast by territory, (6) current dispatchable capacity available, (7) number of DR events dispatched to date by program asset, (8) number of calls remaining by asset, (9) has the monthly and/or annual peak been offset and (10) customer fatigue.
2. Assignees that will have control of curtailment devices include; OATI; Evergy’s DERMS system of record where events are scheduled based on the service territories and assets selected for dispatch and Uplight; Evergy’s DRMS dispatch system of record for direct load control (“DLC”) smart devices. The Company utilizes the respective systems to



schedule and dispatch selected program devices and provide post event settlement data for the measurement and verification of assets curtailed.

3. The Company will determine whether to curtail all Participants simultaneously or stagger curtailment events across Participants based on a number of factors pertaining to each program asset and corresponding operating company. The Company will first evaluate the grid condition by territory and confirm what program resources are available. Second, the Company will evaluate the weather forecast, load forecast and comparison of the weekly loads to the monthly and annual peaks. Next the Company will explore the use cases (peak reduction, local/RTO system conditions) for demand response and their applicability to the forecasted load and system values anticipated for the event day, the status of the grid and load forecast for the operating company evaluated. Last the Company will evaluate the program assets available and any customer considerations to consider in the dispatch of resources for that day. Based on this analysis and input from a cross functional team including Products, Generation, Dispatch Operations, Key Accounts, Marketing Communications, and other factors, an event decision is made.
4. There are no differences between the applicability of the subparts of the response to this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

Information provided by: Kevin Brannan, Sr. Manager, DER Products & Services

Attachment(s):

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Missouri Metro
Case Name: 2023 MO Metro MEEIA Cycle 4
Case Number: EO-2023-0369

Requestor Luebbert J. -
Response Provided June 27, 2024

Question:0013

Please refer to the language included on pages 13 of 109, Appendices 8.6 and 8.7 of the Application in this case (labeled P.S.C. MO. No. 1, 2nd Revised Sheet No. R-84).

1. Identify the scope of the Program Administrator providing “the necessary services to effectively implement the Program and strive to attain the energy and demand savings targets.”
2. Identify and quantify all costs of “the necessary services.”
3. How will Evergy determine if the Program Administrator “effectively implement[s]” the Program?
4. Identify and quantify the “participation incentives” associated with this program.
5. Identify all “other behind the meter technologies” that may participate in this program.
6. Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

1. The scope of services required by the program administrator to provide necessary services to implement the Program and strive to attain energy and demand services will consist of providing turnkey program implementation including but not limited to administration, customer recruiting, field assessment and program preliminary impact analysis, customer support and settlement. Tasks will include workflow management, data tracking, program staffing, program marketing, customer recruitment, onboarding and in season management, evaluation activities support and reporting.
2. Costs supporting activities outlined in item one consists of two costs categories: (1) fixed portfolio management covering program administration, staffing, marketing and program management activities and (2) variable vendor incentive that will provide a tiered structure reflecting an enrollment (\$/kW) incentive to recruit customer MW's into the

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program to achieve targets and a curtailment realization performance fee to align a portion of vendor compensation to delivered performance.

3. The Company will determine if the Program Administrator effectively implemented based on several factors. Key performance indicators for success include:
 - a. Realized MW achievement.
 - b. Program evolution to support flexible load management (duration & dispatchability) capabilities of the program.
 - c. Customer engagement and experience
 - d. Cost effectiveness in MW's recruited to MWs realized.
4. See Response 1 to Question 0010 for a description of the participation incentives associated with the Business Demand Response Program.
5. Business customers participate in the Business Demand Response Program by nominating a curtailable load (kW). Participants may achieve their curtailable load by utilizing any behind the meter technology of their choosing. Most commonly, participants utilize HVAC equipment, process equipment (e.g., industrial freezer, shredder, crusher, production line, etc.), and/or back-up generators to achieve the curtailable load. The Company does not seek to limit and could not attempt to identify *all* potential technologies that business customers may use to curtail load, now or in the future.
6. Responses to all subparts of this data request are applicable to both Evergy Missouri Metro and Evergy Missouri West.

Information provided by: Kevin Brannan, Sr. Manager, DER Products & Services

Attachment(s):

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs

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Case Nos. EO-2023-0369 / EO-2023-0370

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Evergy Missouri Metro
Case Name: 2023 MO Metro MEEIA Cycle 4
Case Number: EO-2023-0369

Requestor Luebbert J. -
Response Provided July 02, 2024

Question:0016

Please refer to the Applicability language included on page 36 of 109, Appendices 8.6 and 8.7 of the Application in this case (labeled P.S.C. MO. No. 1, Original Sheet No. 138.20). 1. “This rider is applicable to all non-lighting kilowatt-hours (kWh) of energy supplied to customers under the Company’s retail rate schedules, excluding kWh of energy supplied to "opt-out" customers.” a. Does Evergy intend to collect MEEIA costs through lighting rate schedules? b. Is it Evergy’s contention that lighting rate schedules are exempt from MEEIA DSIM charges or that ratepayers in the lighting class have the ability to opt-out of DSIM charges? If so, please provide all justification for Evergy’s conclusions. 2. “Charges passed through this DSIM Rider reflect the charges approved to be collected from the implementation of the Missouri Energy Efficiency Investment Act (MEEIA) Cycle 4 Plan and any remaining unrecovered charges from the MEEIA Cycle 3 Plan and the MEEIA Cycle 2 Plan DSIM.” a. Identify and quantify all MEEIA Cycle 2 Plan DSIM costs that have yet to be recovered through Evergy’s existing DSIM. b. Why have the Cycle 2 costs not been collected prior to this point in time? 3. Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

1a. Evergy does not intend to collect MEEIA costs through lighting rate schedules.

1b. Since MEEIA and the DSIM has been in effect, Evergy has not had lighting-rate-related programs; therefore, lighting-rate customers do not receive the DSIM. The language “This rider is applicable to all non-lighting kilowatt-hours (kWh) of energy supplied to customers under the Company’s retail rate schedules, excluding kWh of energy supplied to "opt-out" customers is in the currently effective DSIM tariff.



2a. MEEIA Cycle 2 Plan DSIM costs, including carrying costs, that have yet to be recovered/refunded as of 4/30/2024 through Evergy's existing DSIM are:

- \$414,078 of throughput disincentive yet to be recovered,
- \$10,651 of earnings opportunity yet to be refunded, and
- \$12,825 of ordered adjustments yet to be refunded.

2b. The Cycle 2 costs have not been fully collected due to (i) the difference between actual billed kWhs and the forecasted billed kWhs used to calculate the tariff amount and (ii) the difference between actual amounts in the months of the forecasted period and the forecasted amounts in the forecasted period used to calculate the tariff amount.

3. There are no differences in applicability between the two jurisdictions.

Information provided by:

Shauna Dempsey, Sr. Energy Efficiency Programs Accountant

Attachment(s):

None.

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Missouri Metro
Case Name: 2023 MO Metro MEEIA Cycle 4
Case Number: EO-2023-0369

Requestor Luebbert J. -
Response Provided July 03, 2024

Question:0021

Please refer to the following language included on page 15 of 109, Appendices 8.6 and 8.7 of the Application in this case (labeled P.S.C. MO. No. 1, 2nd Revised Sheet No. R-86):

1. Identify each measure that will be offered as part of the Hard-to Reach Business Program as well as the “enhanced incentives” for each measure.
2. How will “enhanced incentives” be determined for each program component?
3. How did Evergy determine the “100 kW per year” demand threshold?
4. Is Evergy considering the entire Hard-to-Reach Program a low-income or educational program for purposes of evaluation? If so, please fully explain why it is reasonable to consider this program low-income or educational. If Evergy believes that a portion of this program is considered low-income or educational, identify each component that Evergy considers low-income or educational and provide as much detail as possible explaining how Evergy will account for program related costs that are not considered low-income or educational costs.
5. Provide page specific citations for all discussion of the seven components of the Hard-to Reach Business Program included in testimony or attachments within Evergy’s MEEIA application or cell specific citations for the program in supporting workpapers.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

1. Identify each measure that will be offered as part of the Hard-to Reach Business Program as well as the “enhanced incentives” for each measure.
Hard-to-Reach measures are identical the Whole Business Efficiency measures as noted in Appendix 8.2.
2. How will “enhanced incentives” be determined for each program component?
Exact Incentive Levels are yet to be determined; however, we can provide the methodology for the Hard-to-Reach Business components as noted below:
 - *Enhanced Business Comfort – Approximately 150% of the WBE rebate level*

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- *Enhanced Business Products – Approximately 150% of the WBE rebate level*
- *Enhanced Business Operational – Approximately 150% of the WBE rebate level*
- *Enhanced Business Custom – Approximately 150% of the WBE rebate level*
- *Virtual Energy Management – Same as Whole Business Efficiency*
- *Social Services – Approximately 100% of the incremental cost*
- *No Cost Assessment and Free Energy Savings Kit - Free*

3. How did Evergy determine the “100 kW per year” demand threshold?

These are the same thresholds as KEEIA programs in Kansas; since we have adjoining territories with potential for customers with business across state lines, we wanted to treat both sets of customers the same and keep consistencies.

4. Is Evergy considering the entire Hard-to-Reach Program a low-income or educational program for purposes of evaluation? If so, please fully explain why it is reasonable to consider this program low-income or educational. If Evergy believes that a portion of this program is considered low-income or educational, identify each component that Evergy considers low-income or educational and provide as much detail as possible explaining how Evergy will account for program related costs that are not considered low-income or educational costs.

Evergy proposes to treat the Social Services component as a low-income offer, as the clientele these agencies serve are low-income. All other components under Hard-to-Reach will not be considered low-income or educational.

5. Provide page specific citations for all discussion of the seven components of the Hard-to-Reach Business Program included in testimony or attachments within Evergy’s MEEIA application or cell specific citations for the program in supporting workpapers.

Listed below are the locations in the filing that include discussions of the Hard-to-Reach Business Program. Please note that there are other documents that do include Hard-to-Reach Business program, however as I am reading this request you are seeking ‘discussion’ documents not to include things such as TRM, Earnings Opportunity, etc.

Appendix 8.1 – pg. 25-28

Tariffs:

Hard-to-Reach Business Program Sheet 2.03

Hard-to-Reach Business Program Sheet R-86-R-87

Information provided by: Natalie Gray, Manager DSM Energy Efficiency

Attachment(s):



Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Missouri Metro
Case Name: 2023 MO Metro MEEIA Cycle 4
Case Number: EO-2023-0369

Requestor Luebbert J. -
Response Provided July 03, 2024

Question:0026

Please refer to the language included on page 25 of 109, Appendices 8.6 and 8.7 of the Application in this case (labeled P.S.C. MO. No. 1, 2nd Revised Sheet No. R-101).

1. Define “point-of-purchase rebates” as the term is used in the referenced sheet.
2. Fully explain how Evergy Missouri will limit participation in the “Whole Home Efficiency Program” to Evergy ratepayers.
3. Fully explain the steps that Evergy Missouri will take to ensure that energy and demand savings from this program are limited to residential homes in the Evergy Missouri West service territory.
4. To the extent that Participants in the “Whole Home Efficiency Program” will be an entity other than an Evergy residential ratepayer, fully explain how Evergy has accounted for the Incentive within the workpapers provided in support of Evergy’s application and direct testimony in this case.
5. Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

1. Define “point-of-purchase rebates” as the term is used in the referenced sheet.
Refers to Evergy DSM measure/product instant discounts being applied when customer buys at either in-store at brick and mortar or online through the Evergy marketplace.
2. Fully explain how Evergy Missouri will limit participation in the “Whole Home Efficiency Program” to Evergy ratepayers.
For point-of-purchase rebates, Evergy plans to follow the same process as is currently deployed in 2024, which is noted below.
Brick and mortar:
 - *Items with a rebate less than \$50: utilize a drive-time analysis – 80% of customers within*



a 20-minute drive time are Evergy customers. Exceptions can be made for brick-and-mortar locations in rural areas, allowing for a 30-minute drive time analysis, due to the distance customer would travel to get to those locations.

Items with a rebate level of \$50 or more require a post-purchase application with individual customer validation.

Online Marketplace:

- *Customers do not receive the instant discount, rebate, cost reduction until their account information has been inputted into the online platform and verified.*

Other Residential offers:

- *The application requires the customer unique information be provided in the application, which is reviewed and processed prior to rebates being paid.*

3. Fully explain the steps that Evergy Missouri will take to ensure that energy and demand savings from this program are limited to residential homes in the Evergy Missouri West service territory.

Evergy will follow the steps noted above, in the Question 2 response to ensure savings are limited to our customers.

4. To the extent that Participants in the “Whole Home Efficiency Program” will be an entity other than an Evergy residential ratepayer, fully explain how Evergy has accounted for the Incentive within the workpapers provided in support of Evergy’s application and direct testimony in this case.

Participants are always Evergy residential ratepayers. With the exception of the small % of leakage that is determined through the EM&V process, in which occurs through the brick-and-mortar instant discounts. Such are not accounted for in the workpapers, this is purely an offset of claimable savings. Evergy additional details around rebate reassignment scenarios in MPSC_20240606 DR 0002.

5. Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

No differences to note.

Information provided by: Natalie Gray, Manager, DSM Energy Efficiency

Attachment(s):



Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Missouri Metro
Case Name: 2023 MO Metro MEEIA Cycle 4
Case Number: EO-2023-0369

Requestor Luebbert J. -
Response Provided July 02, 2024

Question:0017

Please refer to the following language included on page 39 of 109, Appendices 8.6 and 8.7 of the Application in this case (labeled P.S.C. MO. No. 1, Original Sheet No. 138.23): “Allocation of MEEIA Cycle 4 Program Costs, TD and EO for each rate schedule for the MEEIA Cycle 4 Plan will be allocated as outlined in EO-2023-0370.” 1. Fully explain Evergy’s proposed methods for allocation. If Evergy feels that this has been thoroughly explained in filings within this docket, provide page and line specific references to the discussion which provides this information. 2. Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

1. Evergy’s proposed methods of allocating Program Costs, TD and EO for each rate schedule are provided in the file “MEEIA Cycle 4 Report 4-29-2024.pdf”, on page 34, section 4.3, Figure 4.1 Cost Allocation Methods.
2. None.

Information provided by:

Shauna Dempsey, Sr. Energy Efficiency Programs Accountant

Attachment(s):

None



Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Missouri Metro
Case Name: 2023 MO Metro MEEIA Cycle 4
Case Number: EO-2023-0369

Requestor Luebbert J. -
Response Provided July 03, 2024

Question:0028

Please refer to the “Availability” section included on page 26 of 109, Appendices 8.6 and 8.7 of the Application in this case (labeled P.S.C. MO. No. 1, 3rd Revised Sheet No. R-102), which has been reproduced below for ease of reference: “AVAILABILITY: All residential customers,2 home builders/developers, realtors, multi-family building designers and engineers, local HVAC distributors and contractors, and energy raters.”

1. Provide an explanation of all scenarios, separately for each program that includes availability for realtors, that may occur that results in a realtor being considered the program Participant.

a. Define “realtors”.

b. What incentive would be made available to realtors?

c. Identify the specific measures and the specific program components that a realtor will be considered the program Participant.

d. Identify the participation, by year, from 2018 through 2024, that a realtor was the program Participant including program, measure types, and incentives provided.

e. Fully explain how Evergy ratepayers realize benefits from realtors as program Participants.

f. Identify how Evergy has accounted for realtors as program Participants in the estimation of costs and benefits for the Cycle 4 programs.

g. Why is this type of program participation necessary or reasonable in the context of MEEIA Cycle 4?

h. What level of participation for each program is expected to result in realtors as the program Participant? Provide all support for the assumptions utilized to determine the values.

i. Fully describe all limitations on participation of realtors in each program that allows their participation.

2. Provide an explanation of all scenarios, separately for each program that includes availability for multi-family building designers and engineers, that may occur that results in multi-family building designers and engineers being considered the program Participant.

a. Define “multi-family building designers and engineers”.

b. What incentive would be made available to multi-family building designers and engineers?

c. Identify the specific measures and the specific program components that multi-family building designers and engineers will be considered the program Participant.

d. Identify the participation, by year, from 2018 through 2024, that multi-family building designers and engineers were the program Participant including program, measure types, and incentives provided.

e. Fully explain how Evergy ratepayers realize benefits from multi-family building designers and engineers as program Participants.



- f. Identify how Evergy has accounted for multi-family building designers and engineers as program Participants in the estimation of costs and benefits for the Cycle 4 programs.
 - g. Why is this type of program participation necessary or reasonable in the context of MEEIA Cycle 4?
 - h. What level of participation for each program is expected to result in multi-family building designers and engineers as the program Participant? Provide all support for the assumptions utilized to determine the values.
 - i. Fully describe all limitations on participation of multi-family building designers and engineers in each program that allows their participation.
3. Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

Realtors and multi-family building designers and engineers have not historically been considered program participants; these groups have not received any incentives. However, Evergy does feel like there is potential to include such partners in our programs to influence our shared customers to become more energy efficient.

There are no notable differences between Evergy Missouri Metro and Evergy Missouri West.

Information provided by: Natalie Gray, Manager, DSM Energy Efficiency

Attachment(s):

Missouri Verification:



I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Missouri Metro
Case Name: 2023 MO Metro MEEIA Cycle 4
Case Number: EO-2023-0369

Requestor Luebbert J. -
Response Provided July 03, 2024

Question:0025

Explain any differences in Evergy's responses to each subpart of Staff data requests 2, 3, 4, and 5 as they relate to Residential Demand-Side Management as referenced on page 20 through 24 of 109, Appendices 8.6 and 8.7 of the Application in this case (labeled P.S.C. MO. No. 1, 1st Revised Sheet No. R-96, 2nd Revised Sheet No. R-97, 1st Revised Sheet No. R-98, 2nd Revised Sheet No. R-99, and 2nd Revised Sheet No. R-100). • Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

There are no differences in responses by the Company to each subpart of Staff data requests 2, 3, 4 and 5 as they relate to Residential Demand-Side Management as they relate to Residential Demand Side Management as referenced on page 20 through 24 of 109, Appendices 8.6 and 8.7 of the Application in this case (labeled P.S.C. MO. No. 1, 1st Revised Sheet No. R-96, 2nd Revised Sheet No. R--97, 1st Revised Sheet No. R-98, 2nd Revised Sheet No. R-99, and 2nd Revised Sheet No. R-100).

There are no differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

Information provided by: Kevin Brannan, Sr. Manager, DER Products & Services

Attachment(s):



Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Missouri Metro
Case Name: 2023 MO Metro MEEIA Cycle 4
Case Number: EO-2023-0369

Requestor Luebbert J. -
Response Provided July 03, 2024

Question:0027

Please refer to the “Availability” section included on page 25 of 109, Appendices 8.6 and 8.7 of the Application in this case (labeled P.S.C. MO. No. 1, 2nd Revised Sheet No. R-101), which has been reproduced below for ease of reference: “AVAILABILITY: All residential customers, manufacturers, local retailers, home builders/developers, HVAC distributors and contractors, and energy raters.”

1. Provide an explanation of all scenarios, separately for each program that includes availability for home builders/developers, that may occur that results in a home builder/developer being considered the program Participant.
 - a. Define “home builders/developers”.
 - b. What incentive would be made available to home builders/developers?
 - c. Identify the specific measures and the specific program components that a home builder/developer will be considered the program Participant.
 - d. Identify the participation, by year, from 2018 through 2024, that a home builder/developer was the program Participant including program, measure types, and incentives provided.
 - e. Fully explain how Evergy ratepayers realize benefits from home builder/developer as program Participants.
 - f. Identify how Evergy has accounted for home builder/developer as program Participants in the estimation of costs and benefits for the Cycle 4 programs.
 - g. Why is this type of program participation necessary or reasonable in the context of MEEIA Cycle 4?
 - h. What level of participation for each program is expected to result in home builders/developers as the program Participant? Provide all support for the assumptions utilized to determine the values.
 - i. Fully describe all limitations on participation of home builders/developers in each program that allows their participation.
2. Provide an explanation of all scenarios, separately for each program that includes availability for HVAC distributors and contractors, that may occur that results in HVAC distributors and contractors being considered the program Participant.
 - a. Define “HVAC distributors and contractors”.
 - b. What incentive would be made available to HVAC distributors and contractors?
 - c. Identify the specific measures and the specific program components that HVAC distributors and contractors will be considered the program Participant.
 - d. Identify the participation, by year, from 2018 through 2024, that an HVAC distributor or contractor was the program participant including program, measure types, and incentives provided.



- e. Fully explain how Evergy ratepayers realize benefits from HVAC distributors and contractors as program Participants.
 - f. Identify how Evergy has accounted for HVAC distributors and contractors as program Participants in the estimation of costs and benefits for the Cycle 4 programs.
 - g. Why is this type of program participation necessary or reasonable in the context of MEEIA Cycle 4?
 - h. What level of participation for each program is expected to result in HVAC distributors and contractors as the program Participant? Provide all support for the assumptions utilized to determine the values.
 - i. Fully describe all limitations on participation of HVAC distributors and contractors in each program that allows their participation
3. Provide an explanation of all scenarios, separately for each program that includes availability for energy rates, that may occur that results in “energy raters” being considered the program Participant.
- a. Define “energy raters”.
 - b. What incentive would be made available to “energy raters”?
 - c. Identify the specific measures and the specific program components that energy raters will be considered the program Participant.
 - d. Identify the participation, by year, from 2018 through 2024, that an energy rater was the program participant including program, measure types, and incentives provided.
 - e. Fully explain how Evergy ratepayers realize benefits from energy raters as program Participants.
 - f. Identify how Evergy has accounted for energy raters as program Participants in the estimation of costs and benefits for the Cycle 4 programs.
 - g. Why is this type of program participation necessary or reasonable in the context of MEEIA Cycle 4?
 - h. What level of participation for each program is expected to result in energy raters as the program Participant? Provide all support for the assumptions utilized to determine the values.
 - i. Fully describe all limitations on participation of energy raters in each program that allows their participation.
4. Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

Q1 Answer: Builders and Developers have not historically been considered program participants; these groups have not received any incentives. However, Evergy does feel like there is potential



to include such partners in our programs to influence our shared customers to become more energy efficient.

Q2 Answer: HVAC distributors have not historically been considered program participants; these groups have not received any incentives. However, Evergy does feel like there is potential to include such partners in our programs to influence our shared customers to become more energy efficient.

a-c: HVAC contractors refers to our network of HVAC companies that Evergy qualifies to be part of the Whole Home Efficiency program, under component Home Comfort – HVAC Rebates. Residential customers that participate in the program have the option to reassign their rebate to the HVAC contractor, to receive an instant reduction on their invoice, instead of a check payment later. In these situations, Evergy will pay the contractor the rebate, that has been passed-through to the customer, directly to the contractor.

d: HVAC Rebate Reassignment (combined Evergy MO Metro and Evergy MO West jurisdictions)

Year	Rebate Reassignment	Program	Measure Type (s)
2018	\$957,790.96	Whole House Efficiency	HVAC Replacement
2019	\$630,318.09	Whole House Efficiency	HVAC Replacement
2020	\$711,648.54	Heating, Cooling & Home Comfort	HVAC Replacement
2021	\$747,942.21	Heating, Cooling & Home Comfort	HVAC Replacement
2022	\$748,859.39	Heating, Cooling & Home Comfort	HVAC Replacement
2023	\$922,203.24	Heating, Cooling & Home Comfort	HVAC Replacement
2024	\$403,594.02	Heating, Cooling & Home Comfort	HVAC Replacement



e-i: Evergy ratepayers/participants are the beneficiaries of this rebate, it is a passthrough channel. Therefore, Evergy does not account for this in our cost/benefits estimations. This offers customers options in how they receive their Evergy benefit/incentive for choosing energy efficiency, with the amount of interest we have seen over the years, Evergy believes this is a high value option. Over the years we have seen an average of 38% of the customers participating in the Heating, Cooling and Home Comfort program select this option.

Q3 Answer: Energy Raters have not historically been considered program participants; these groups have not received any incentives, as they are typically partnered with on new construction programs. However, Evergy does feel like there is potential to include such partners in our programs to influence our shared customers to become more energy efficient, as we look to provide new construction programs in MEEIA Cycle 4.

There are no notable differences between Evergy Missouri Metro and Evergy Missouri West.

Information provided by: Natalie Gray, Manager, DSM Energy Efficiency

Attachment(s):

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Missouri Metro
Case Name: 2023 MO Metro MEEIA Cycle 4
Case Number: EO-2023-0369

Requestor Luebbert J. -
Response Provided July 03, 2024

Question:0029

Please refer to Appendices 8.6 and 8.7 of the Application in this case. There appears to be several references that are missing (i.e. indication of a footnote or reference that does not exist in the document). Examples include, on page 26 of 109 of the Appendices 8.6 and 8.7 of the Application, the AVAILABILITY Section lists “All residential customers,2” page 27 of 109 includes “moderate-income single-family customers.3” and “enhanced rebates4”, but no footnotes are provided. Please provide the missing references or footnote information throughout the Appendices, indicating the page number for each missing reference.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

Appendices 8.6 and 8.7 Footnotes:

- Reference on page 26 of 109 of the Appendices 8.6 and 8.7 of the Application, the AVAILABILITY Section lists “All residential customers,2”
Reference inadvertently left off; this would include any of customers on a residential rate code.
- Reference on page 27 of 109 includes “moderate-income single-family customers,3”
Reference inadvertently left off; this would include single family and duplex building, with household income levels at 201%-300% Federal Poverty Level.
- Reference on page 27 of 109 includes “enhanced rebates,4”
Reference inadvertently left off; this would include rebates to cover the entirety of the energy efficiency upgrade’s incremental cost, between the standard baseline efficiency cost and the efficient option cost.

Information provided by: Natalie Gray, Manager, DSM Energy Efficiency



Attachment(s):

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Missouri Metro
Case Name: 2023 MO Metro MEEIA Cycle 4
Case Number: EO-2023-0369

Requestor Luebbert J. -
Response Provided July 03, 2024

Question:0030

Please refer to the “Multi-Family Common Areas” section included on page 27 of 109, Appendices 8.6 and 8.7 of the Application in this case (labeled P.S.C. MO. No. 1, 1st Revised Sheet No. R-103), which has been reproduced below for ease of reference: “Multi-Family Common Areas. Prescriptive and custom rebates will be available for qualifying upgrades.”

1. Identify and quantify the “prescriptive rebates” that will be available for each measure.
2. Define “qualifying upgrades”.
3. Fully describe the process for determining eligibility for “custom rebates”.
4. How will the rebate amounts for “custom rebates” be determined? Provide formulas or calculation methods that will be utilized.
5. Are the “Multi-Family Common Areas” typically served under residential rate schedules?
 - a. If not, identify the expected participation by rate class.
6. Fully describe the differences in the energy efficiency measures, Participants, and Incentives between “Multi-Family Common Areas” and Low Income Multi-Family.
7. Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

1. Identify and quantify the “prescriptive rebates” that will be available for each measure.
 - a. It is the intent of Evergy to provide a variety of potential prescriptive rebates in consultation with a selected implementation contractor. A non-exclusive list of prescriptive rebates could include, as Evergy’s existing income-eligible multifamily program does today, rebates for high efficiency HVAC, efficient appliances, programmable and smart thermostats, increased insulation, air sealing, with the potential for inclusion of cool roofs, efficient domestic hot water, pumps, chillers, shade screens and trees, and controls and are identified in Appendix 8.2 Evergy TRM.
2. Define “qualifying upgrades”.

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- a. Qualifying upgrades can generally be defined as equipment or installation practices that exceed national minimum manufacturing efficiency requirements and/or local building code standards. It is typical, however not always possible, to align qualifying upgrades to minimum efficiency levels of national energy efficiency standards from the likes of Energy Star, WaterSense, or Design Lighting Consortium. Beyond minimum efficiency levels - qualifying upgrades must be new equipment, used or refurbished equipment is not a qualifying upgrade.
3. Fully describe the process for determining eligibility for “custom rebates”.
 - a. The eligibility for custom rebates requires that:
 - i. the upgrade is a qualifying upgrade, i.e., it exceeds minimum efficiency standards and is new equipment or installation.
 - ii. the upgrade would not get a higher rebate through an existing prescriptive rebate.
 - iii. there is an industry standard methodology to determine energy savings and or demand savings. This can be a technology specific calculation and methodology, i.e., elevator energy use calculations or building wide calculation or methodology such as building energy use modeling.
4. How will the rebate amounts for “custom rebates” be determined? Provide formulas or calculation methods that will be utilized.
 - a. For simplicity of understanding custom rebates in the multifamily industry, it is typical to calculate custom rebates as a dollar value per first year annual kWh saved (\$/kWh). The range of this value is filed in appendix 8.3. Custom rebates could also be calculated on a dollar value per coincident peak demand reduction (\$/kW).
 - b. The energy savings values are determined by technology specific calculations and/or building wide modeling reviewed by energy engineers.
5. Are the “Multi-Family Common Areas” typically served under residential rate schedules?
 - a. If not, identify the expected participation by rate class.
 - a. No, “Multi-Family Common Areas” are not typically served under residential rate schedules. It is most typical for multi-family buildings to be individually metered, where each apartment unit has an individual electric meter (on a residential rate schedule) and the common areas are on a non-residential service rate schedule. In this scenario the common areas are typically on small general service non-residential rate schedules. Alternatively, the multi-family building can be master metered, where all apartments and common areas share one meter serving the building. This is more common in affordable multifamily housing towers housing seniors and disabled residents. In this scenario the multi-family building and with it, the common areas, are typically on a large general service non-residential service rate schedule.
6. Fully describe the differences in the energy efficiency measures, Participants, and Incentives between “Multi-Family Common Areas” and Low Income Multi-Family.
 - a. It is the intent of Evergy that the “Multi-Family Common Areas” are included in Low-Income Multi-Family so there would be no difference in energy efficient measures, participants, or incentives. For the typical individually metered



apartment building the “Multi-Family Common Areas” use residential scale equipment also commonly found in the apartment units: HVAC less than 5 tons, residential appliances (refrigerators and dishwashers), residential bathroom exhaust fans, residential lighting fixtures excepting parking lot and outdoor site lighting. As such, it is best practice to provide the same rebate for common areas and tenant areas. The exception to this is master metered buildings where central HVAC and DHW uses custom calculations to determine savings.

7. Describe any differences between the applicability of all subparts of this data request and the subsequent responses for Evergy Missouri Metro and Evergy Missouri West.
 - a. At this time there is no intent to make measures, incentives, or processes different between Evergy Missouri Metro and Evergy Missouri West.

Information provided by: Natalie Gray, Manager, DSM Energy Efficiency

Attachment(s):

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs