

Exhibit No.:
Issue: DSIM Rider
Witness: Leigh Anne Jones
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Evergy Missouri Metro and Evergy Missouri
West
Case No.: EO-2023-0369/0370
Date Testimony Prepared: July 9, 2024

MISSOURI PUBLIC SERVICE COMMISSION

CASE NOS.: EO-2023-0369/0370

REBUTTAL TESTIMONY

OF

LEIGH ANNE JONES

ON BEHALF OF

**EVERGY MISSOURI METRO and
EVERGY MISSOURI WEST**

**Kansas City, Missouri
July 2024**

REBUTTAL TESTIMONY

OF

LEIGH ANNE JONES

Case Nos. EO-2023-0369/0370

1

I. INTRODUCTION

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

3 A: My name is Leigh Anne Jones. My business address is 1200 Main Street, Kansas
4 City, Missouri 64105.

5 **Q: Are you the same Leigh Anne Jones who filed direct testimony in these dockets**
6 **on April 29, 2024?**

7 A: Yes.

8 **Q: Who are you testifying for?**

9 A: I am testifying on behalf of Evergy Metro, Inc. d/b/a as Evergy Missouri Metro
10 (“Evergy Missouri Metro”), Evergy Missouri West, Inc. d/b/a Evergy Missouri
11 West (“Evergy Missouri West”) (collectively, “Evergy” or the “Company”).

12 **Q: What is the purpose of your rebuttal testimony?**

13 A: The purpose of my testimony is to address certain issues or recommendations raised
14 with regard to the Company’s proposed Throughput Disincentive included in the
15 Evergy Demand Side Investment Mechanism (“DSIM”) Rider by Staff Witnesses
16 Sarah Lange, J Luebbert, and Hari Poudel.

1 **Q: Staff Witness Sarah Lange states on page 31 of her Direct Testimony that**
2 **“...the current NTD will become unworkably complex if modified to address**
3 **time-based rates...”. Staff Witness J Luebbert stated on page 28 of his Direct**
4 **Testimony that “More granularity and specificity are likely necessary to avoid**
5 **future over or under recovery if net marginal rates continue as part of a**
6 **throughput disincentive mechanism.” Further, Staff Witness Hari Poudel,**
7 **PhD states on page 4 of his testimony that “Therefore, using the historical NTD**
8 **along with time-variant rate structures is unlikely to be either precise or**
9 **accurate. Consequently, it is necessary to change the existing NTD calculation**
10 **mechanism.” How has Evergy responded to the implementation of time-based**
11 **rate plans in its proposed Throughput Disincentive (“TD”) calculation**
12 **included in its DSIM Rider?**

13 **A:** The Company has made several modifications with regard to the calculation of TD
14 associated with energy (kWh) savings produced in its programs directed at
15 residential customers, currently the only class impacted by the implementation of
16 time-based rate tariffs. First, we have modified the monthly load shapes utilized in
17 the TD calculation to reflect the time periods defined in the Company’s time-based
18 rate tariffs, Peak, Off-Peak and Super Off-Peak, for two principal measure
19 categories. One measure category, Heating, Ventilation and Cooling (“HVAC”),
20 comprises approximately 76% (see **Schedule LAJ-1**) of the anticipated savings in
21 the Whole Home Efficiency and Income Eligible programs. The second measure
22 category, Other, comprises the remainder of all other measures due to their similar
23 profiles. Second, we have calculated weighted average residential Net Margin

1 Rate(s) (“NMR”) for each pricing period using the current enrollment in each of
2 the residential rate schedules (Residential Peak Adjustment Service, 3-Period, 2-
3 Period and High-Differential). While this is more complex than the TD calculation
4 for residential kWh savings in Cycles 2 and 3, it is by no means “unworkably
5 complex”.

6 **Q: In describing her perceived challenges with the existing mechanism, Staff**
7 **Witness Lange also states on page 29 of her Direct Testimony that “the**
8 **mechanism Staff proposes in this case eliminates the need to create dozens or**
9 **hundreds of time- and measure-specific margin rates....” Do you agree that it**
10 **is necessary to create dozens or hundreds of time- and measure-specific**
11 **margin rates to make the existing mechanism work for time-based rates?**

12 **A:** No, Staff Witness Lange’s concern is greatly overstated. With regard to the number
13 of margin rates, as noted above, the Company has introduced only four residential
14 rate schedules not dozens or hundreds. The residential rate schedules are applied
15 only by kWh used by customers in the time period (Peak, Off-Peak and Super Off-
16 Peak) and season not by the specific energy efficiency measures resulting in energy
17 savings. Furthermore, the end use measure category load shapes described above
18 tell us when savings occur for a given measure, so we know how much of the
19 savings from a given measure to price at the marginal rate for each time period. The
20 Company’s modifications described above are both reasonable and accurate to
21 compute the throughput disincentive resulting from those savings.

1 **Q: Staff Witness Lange also states on page 31 of her Direct Testimony that there**
2 **is “significant variety in the current rate plan utilization of time-based rate**
3 **plans.” Do you agree?**

4 A: No, if you review the charts she included on page 32 of her Direct Testimony, there
5 is very little notable change following the initial cutover in December 2023 to the
6 default Residential Peak Adjustment Service for customers that did not select one
7 of the other time-based rate plans. The weighted average NMRs would be updated
8 periodically as new rates are effective from future general rate cases.

9 **Q: Staff Witness Luebbert states on page 33 of his Direct Testimony that “The**
10 **DSIM tariff sheets should clearly define the treatment, calculation, recovery**
11 **mechanism, and billing of all applicable charges for the three possible**
12 **program components, as applicable.” Do the tariffs filed by the Company in**
13 **this application do these things?**

14 A: Yes, the Company has filed DSIM Rider tariff sheets 49 through 49.9 for Evergy
15 Missouri Metro and 138.20 through 138.29 for Evergy Missouri West. Should the
16 Company’s application be approved by the Commission, the Company would
17 certainly cooperate with Staff to add further definition and clarification considered
18 necessary for implementation.

19 **Q: Does that conclude your testimony?**

20 A: Yes, it does.

Evergy Missouri Metro

EE by End Use - Average of Cumulative MWh Savings in All Years (@meter)

Programs	Residentia	Residentia	Residentia	Residentia	Residentia	Residentia	Residentia	Residentia	
	ICooling	IHeating	IWater Heating	IInterior Lighting	IExterior Lighting	IAppliances	IElectronics	IMiscellaneous	
Whole Home Efficiency Program	22,278	2,445	772	79	-	2,448	169	61	28,252
Home Energy Education Program	-	-	-	-	-	-	-	-	-
Income Eligible Program	10,715	2,873	3,303	478	-	1,837	951	1,872	22,029
Hard-to-Reach Energy Education Program	-	-	-	-	-	-	-	-	-
UHI Mitigation Program	0	-	-	-	-	-	-	64	64
Home Demand Response Program	624	-	-	-	-	-	-	-	624
	-	-	-	-	-	-	-	-	-
Residential Portfolio	33,618	5,318	4,075	557	-	4,285	1,121	1,997	50,969
Source:	MEEIA_Evergy_Metro_8760_Loadshapes_04-16-24 v2.xlsx, Loadshapes tab								

Evergy Missouri West

EE by End Use - Average of Cumulative MWh Savings in All Years (@meter)

Programs	Residentia	Residentia	Residentia	Residentia	Residentia	Residentia	Residentia	Residentia	
	ICooling	IHeating	IWater Heating	IInterior Lighting	IExterior Lighting	IAppliances	IElectronics	IMiscellaneous	
Whole Home Efficiency Program	32,959	1,631	877	125	-	2,325	185	53	38,156
Home Energy Education Program	-	-	-	-	-	-	-	-	-
Income Eligible Program	5,335	1,314	5,168	946	-	866	680	1,657	15,967
Hard-to-Reach Energy Education Program	-	-	-	-	-	-	-	-	-
UHI Mitigation Program	-	-	-	-	-	-	-	-	-
Home Demand Response Program	774	-	-	-	-	-	-	-	774
	-	-	-	-	-	-	-	-	-
Residential Portfolio	39,069	2,945	6,045	1,071	-	3,192	865	1,711	54,897
Source:	MEEIA_Evergy_West_8760_Loadshapes_04-16-24 v2.xlsx, Loadshapes tab								

Combined Residential Portfolio 72,687 8,263 10,120 1,627 - 7,476 1,985 3,708 105,866

HVAC % of Residential Portfolio 76.46%

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

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

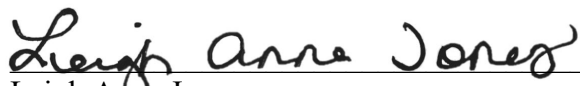
In the Matter of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West’s Notice of Intent to File an) File No. EO-2023-0370
Application for Authority to Establish a Demand-)
Side Programs Investment Mechanism)

AFFIDAVIT OF LEIGH ANNE JONES

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

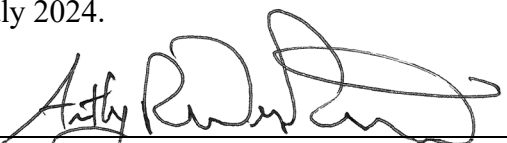
Leigh Anne Jones, being first duly sworn on his oath, states:

1. My name is Leigh Anne Jones. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Senior Director, Corporate Accounting.
2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of Evergy Missouri Metro and Evergy Missouri West consisting of four (4), having been prepared in written form for introduction into evidence in the above-captioned docket.
3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.



Leigh Anne Jones

Subscribed and sworn before me this 9th day of July 2024.



Notary Public

My commission expires: 4/26/2025

