

Exhibit No. 200

Exhibit No.:	_____
Issue(s)	Inefficient Management/ Residential Demand Response
Witness/Type of Exhibit:	Marke/Rebuttal
Sponsoring Party:	Public Counsel
Case No.:	EO-2020-0227

REBUTTAL TESTIMONY

OF

GEOFF MARKE

Submitted on Behalf of the Office of the Public Counsel

**EVERGY METRO, INC. D/B/A EVERGY METRO AND
EVERGY MISSOURI WEST, INC. D/B/A EVERGY
MISSOURI WEST**

CASE NO. EO-2020-0227

September 11, 2020

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

In the Matter of the Second Prudence)
Review of the Missouri Energy Efficiency)
Investment Act (MEEIA) Cycle 2 Energy) File No. EO-2020-0227
Efficiency Programs of Evergy Metro, Inc.)
d/b/a Evergy Missouri Metro)

VERIFICATION OF GEOFF MARKE

Geoff Marke, under penalty of perjury, states:

1. Attached hereto and made a part hereof for all purposes is my rebuttal testimony in the above-captioned case.
2. My answer to each question in the attached rebuttal testimony is true and correct to the best of my knowledge, information, and belief.



Geoff Marke
Chief Economist

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REBUTTAL TESTIMONY
OF
GEOFF MARKE
EVERGY METRO, INC. D/B/A EVERGY MISSOURI METRO
AND EVERGY MISSOURI WEST, INC. D/B/A EVERGY MISSOURI WEST
CASE NO. EO-2020-0227

1 **I. INTRODUCTION**

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

3 A. Geoff Marke, PhD, Chief Economist, Office of the Public Counsel (OPC or Public Counsel),
4 P.O. Box 2230, Jefferson City, Missouri 65102.

5 **Q. What are your qualifications and experience?**

6 A. I have been in my present position with OPC since 2014 where I am responsible for economic
7 analysis and policy research in electric, gas, and water utility operations.

8 **Q. Have you testified previously before the Missouri Public Service Commission?**

9 A. Yes. A listing of the Commission cases in which I have previously filed testimony and/or
10 comments is attached in Schedule GM-1.

11 **Q. What is the purpose of your rebuttal testimony?**

12 A. My testimony responds with specific observations on the ratio of incentive costs to encourage
13 energy efficiency relative to non-incentive administrative costs, and makes further
14 recommendations to the Commission regarding the Missouri Public Service Commission Staff
15 (“Staff”) reports over the “Second Prudence Review of Cycle 2 Costs related to the Missouri
16 Energy Efficiency Investment Act for Electric Operations of Evergy Metro, Inc. and Evergy
17 Missouri West” filed as attachments in the direct testimony of Brad J. Fortson.

18 I also respond in support and provide additional context and rationale for the disallowance
19 related to the residential demand side programs as recommended in the direct testimony of
20 Staff witnesses J. Luebbert.

1 **Q. What is Staff’s position?**

2 A. Staff recommends a disallowance of \$2,134,986.29 for Evergy Missouri Metro (“Metro”) and
3 \$2,363,761.45 for Evergy Missouri West (“West”) for a total of \$4,498,747.74 (“Evergy” and
4 the “Company”). Over ninety-nine percent (99.28%) of this amount (or \$4,466,141) is related
5 to the residential demand response programs (programmable thermostats).

6 **Q. What is your recommendation?**

7 A. I support Staff’s disallowance but I do not believe Staff went far enough in its recommendation
8 concerning imprudent costs. I would recommend an additional \$1,930,392 in disallowance for
9 Evergy Missouri West for a total disallowance across Evergy of \$6,429,139.74. I have no
10 further cost reduction for Evergy Metro as Staff’s recommended disallowance would reflect at
11 least a 50/50 equivalent in non-incentive to incentive cost breakdown, or what I would consider
12 the minimum amount of acceptable management inefficiency for this prudence period.¹

13 This recommendation follows Staff’s rationale articulated in its report, which states:

14 In evaluating prudence, Staff reviews whether a reasonable person making the same
15 decision would find both the information the decision-maker relied on and the process
16 the decision-maker employed to be reasonable based on the circumstances and
17 information known at the time the decision was made, i.e., without the benefit of
18 hindsight. The decision actually made is disregarded; instead, the review evaluates the
19 reasonableness of the information the decision-maker relied on and the decision-
20 making process the decision-maker employed. If either the information relied upon or
21 the decision-making process employed was imprudent, then Staff examines whether
22 the imprudent decision caused any harm to ratepayers. Only if an imprudent decision
23 resulted in harm to ratepayers, will Staff propose a disallowance.²

¹ This assumes that Staff’s cost disallowance is applied solely to non-incentive expenditures and further allows for costs associated with the Research and Pilot programs to be recovered. A further explanation of this rationale will follow within the testimony.

² Direct Testimony of Brad Fortson, Schedule BJT-d3, p. 7 of 49, EO-2020-0227, Mastrogiannis, Brooke, Second Prudence Review of Cycle 2 Costs Related to the Missouri Energy Efficiency Act for the Electric Operations of Missouri Metro, Inc. p. 5, 3-10.

1 Evergy’s inefficient management hurt its ratepayers as Evergy’s prudence period represents
2 the greatest amount of expenditures for non-incentive administrative and overhead costs for
3 any electric utility in any prudence review period on record in Missouri. Evergy’s non-
4 incentive based spending is also more than 10% greater than the national average. As such, I
5 hope by bringing this to the attention to the Commission and other stakeholders that future
6 expenditures will be, at a minimum, in line with the national average moving forward, and not
7 result in further material harm to ratepayers. A disallowance may also, hopefully, compel the
8 utilities that manage these programs to do better than this moving forward.

9 It’s hard to argue against the idea that a utility’s financial condition should depend on the value
10 that its customers received from its services. If no value is received or unnecessary costs
11 outweigh benefits than the Company’s bottom line should reflect that reality just like it does
12 when the benefits outweigh the costs. It should be obvious to the utilities administering energy
13 efficiency programs that the majority of the approved budget get spent on... energy efficiency.
14 Unfortunately, that fact has been lost on Evergy’s management during this prudence period.
15 This reality should not be lost by the Commission as the Company should be accountable for
16 its imprudent management and inaction.

17 **II. INEFFICIENT MANAGEMENT**

18 **Q. You stated that Staff’s recommended disallowance did not go far enough. What did**
19 **Staff’s report fail to highlight?**

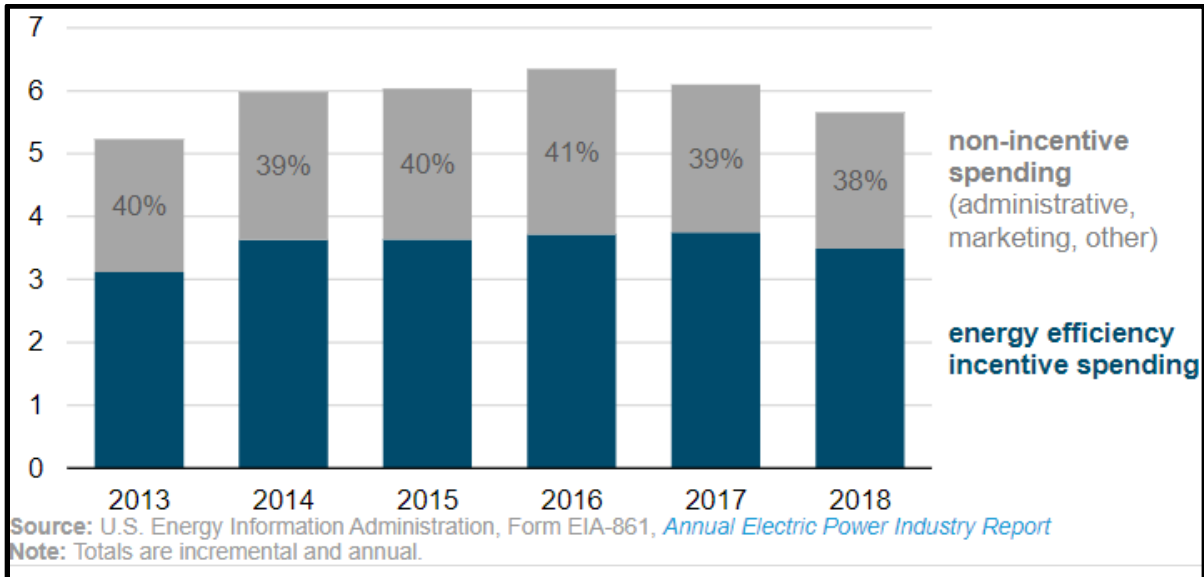
20 A. Staff did not highlight the issue of Evergy Metro and Evergy West’s non-incentive spending
21 compared to the national average.

22 **Q. What is the U.S. average breakdown in budget allocation for energy efficiency programs**
23 **for incentives compared to non-incentives (program administration)?**

24 A. Figure 2 provides a breakdown of the U.S. Energy Information Administration’s (“EIA”) Form
25 EIA-861 annual survey of more than 600 electric utilities and third-party manager’s energy
26 efficiency spending broken down between actual incentive and non-incentive spending. The

1 six-year average for non-incentive spending is 39.5% of total budgets and the three-year
2 average is 39.33%. This suggests that more than 60% of all ratepayer-funded energy efficiency
3 dollars get spent on actual energy efficiency measures or demand-side events.

4 Figure 2: United States Energy Efficiency Spending (2013-2018), billions 2018 dollars

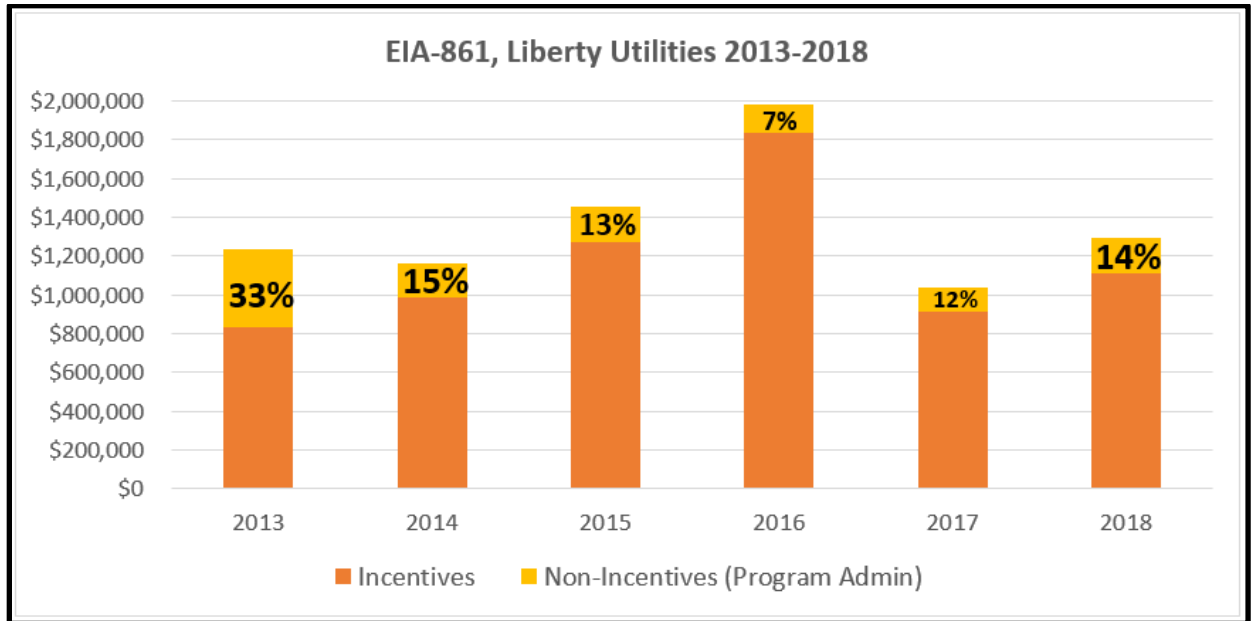


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6 **Q. How do these national numbers compare to Missouri’s electric Investor Owned Utilities (IOU’s) during the same period?**

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8 A. Based on publically available Form EIA-861 data, Missouri’s IOUs have varied considerably
9 during that same time period as seen in Figures 3-6.

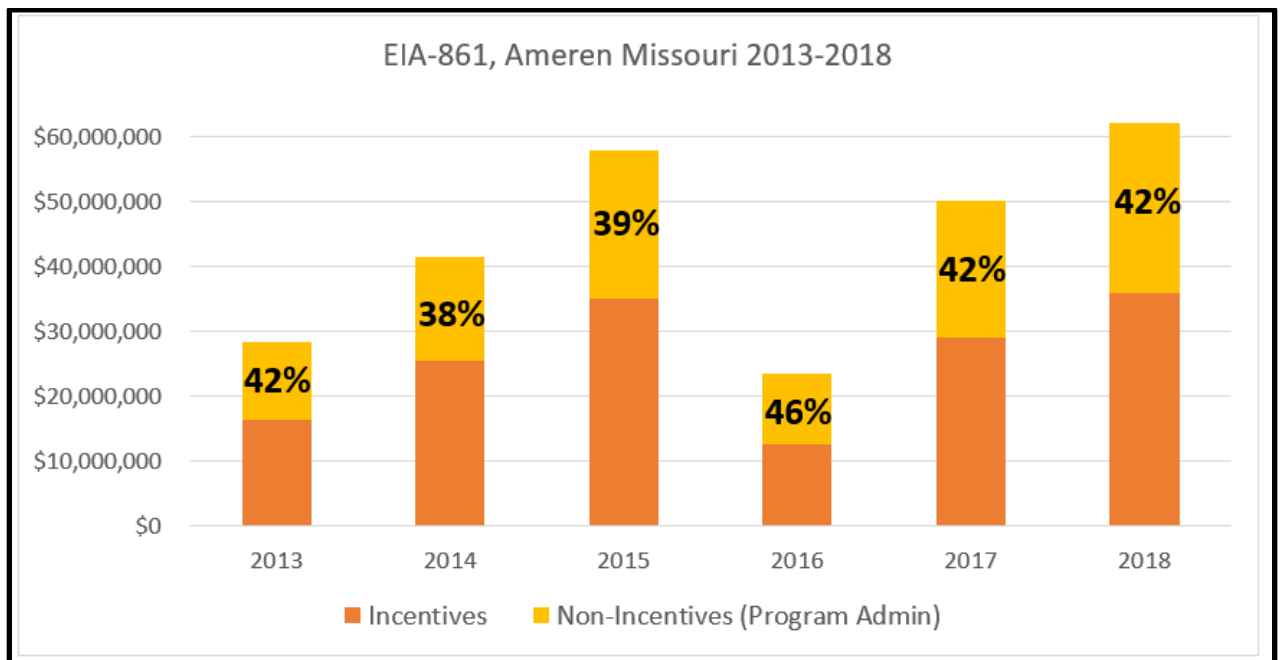
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Figure 3: Liberty Utilities (formerly Empire District Electric) Energy Efficiency Spending (2013-2018), millions 2018 dollars



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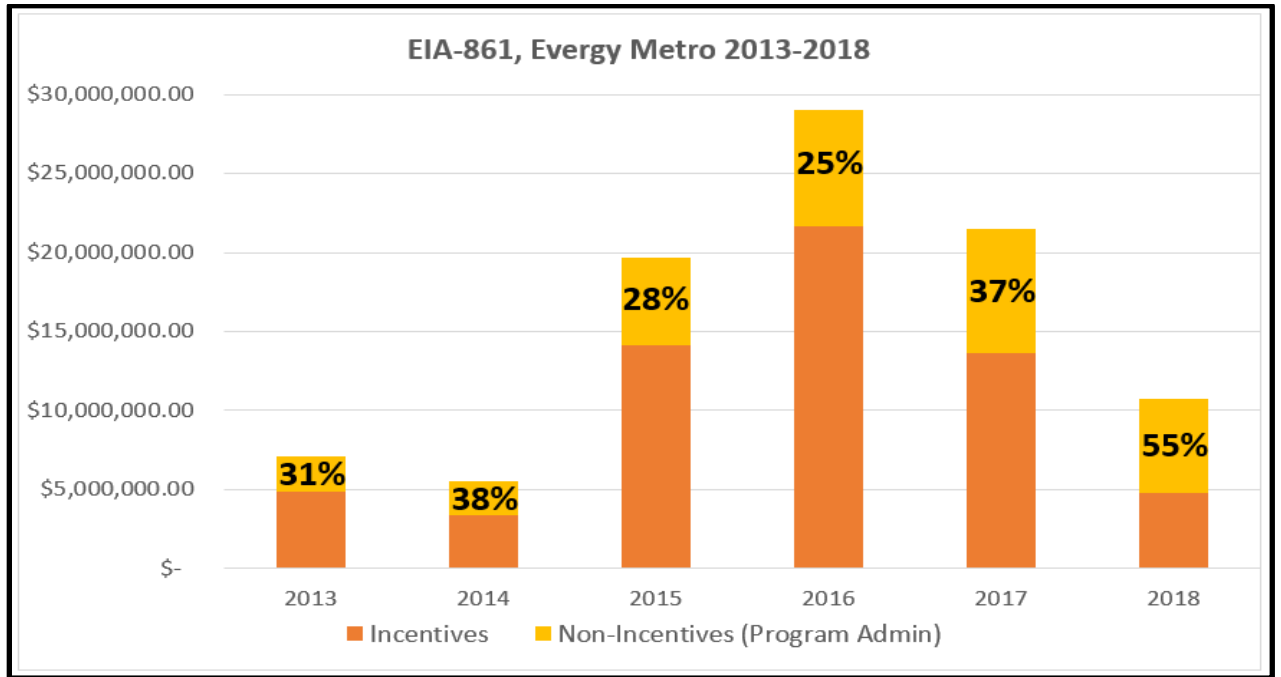
Figure 4: Ameren Missouri Energy Efficiency Spending (2013-2018), millions 2018 dollars



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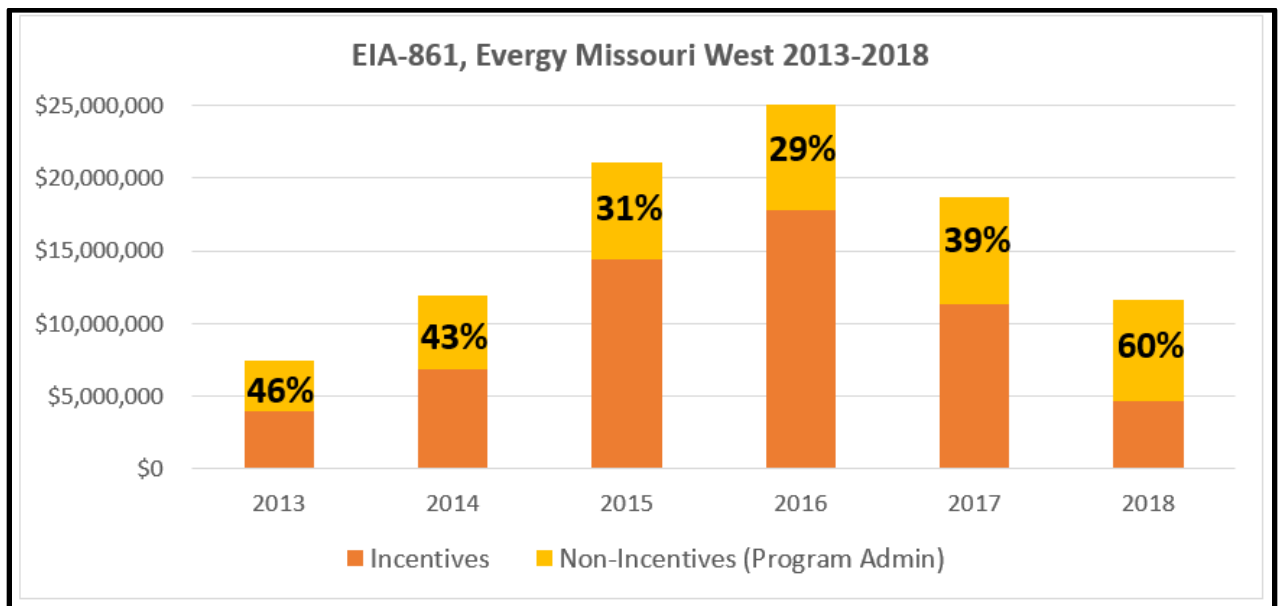
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Figure 5: Evergy Metro (formerly KCPL-MO) Energy Efficiency Spending (2013-2018),
millions 2018 dollars



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Figure 6: Evergy West (formerly KCPL-GMO) Energy Efficiency Spending (2013-2018),
millions 2018 dollars



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1 **Q. What should the Commission note from these figures?**

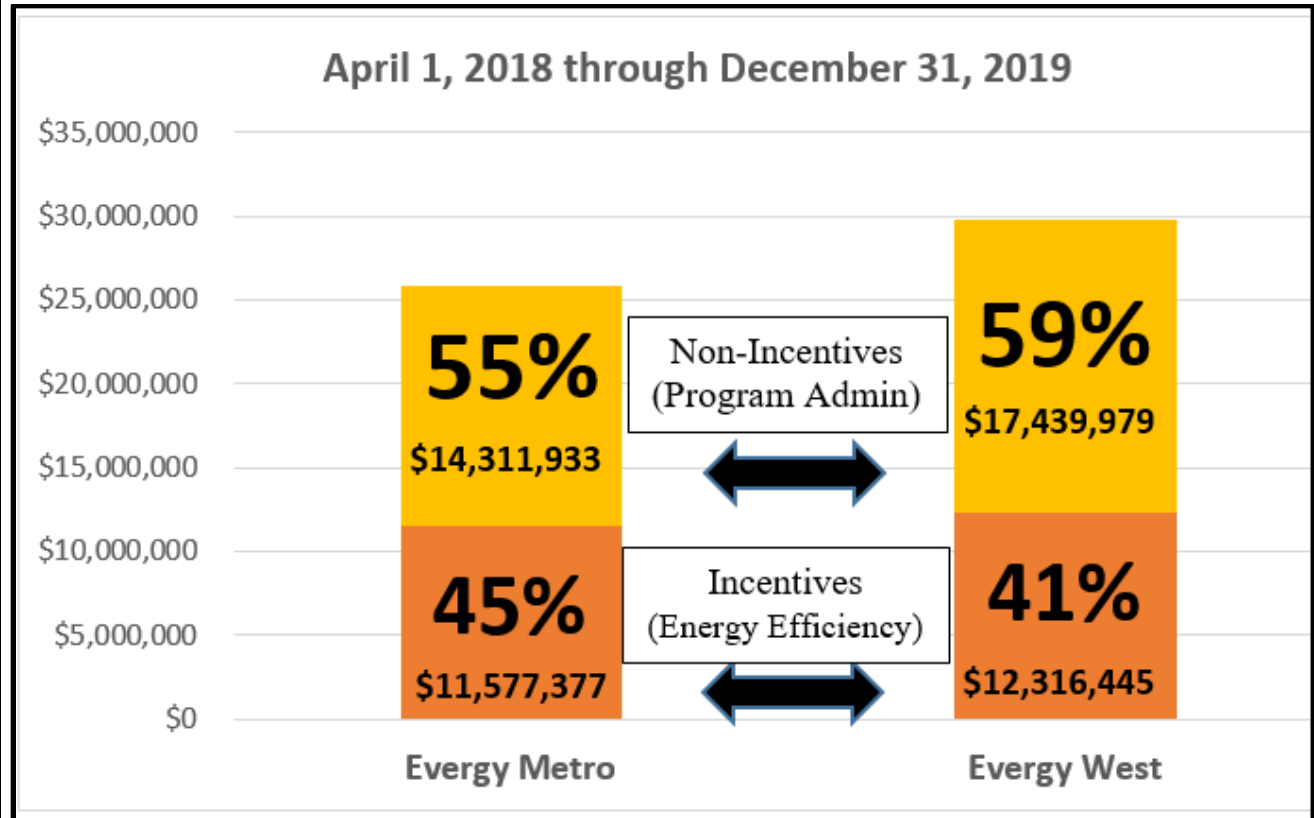
2 A. There are several conclusions that can be drawn from looking at the six-year historical
3 breakdown of energy efficiency expenditures across electric IOUs in Missouri. Liberty utilities
4 has a comparatively smaller program than the other utilities, but has been extremely efficient
5 in having the vast majority of its ratepayer-funded budget actually go to energy efficiency
6 measures. In contrast, Ameren Missouri has a much larger annual budget, but a greater
7 percentage of funds being directed to non-incentive overhead. Ameren Missouri's 6-year
8 average non-incentive budget breakdown is approximately 2% greater than the national
9 average (41.5% to 39.3%). This is concerning, but this number should be reduced moving
10 forward based on the agreed-to parameters of Ameren Missouri's recently approved one-year
11 extension program. Ameren Missouri's MEEIA Cycle III extension went to great lengths to
12 minimize non-incentive overhead with a focus on directing ratepayer dollars towards actual
13 energy efficiency measures and demand-side event actions.

14 The Commission should note that Evergy West/Metro 2018 non-incentive measures are an
15 outlier, with non-incentives costs exceeding incentive costs for both utilities. Non-incentive
16 costs were 17% greater for Evergy Metro (55%) relative to the national average (38%) and
17 23% greater for Evergy West (60%). In fact, out of 515 utilities reporting with energy efficiency
18 programs in 2018, Evergy Metro had the 23rd worst and Evergy West the 19th worst in terms
19 of non-incentive costs relative to incentive cost expenditures. That is, approximately 500
20 utilities did a better job of making sure their energy efficiency budget went to energy efficiency.

21 **Q. That represents 2018. Do you have a breakdown for the prudency period being reviewed**
22 **here?**

23 A. Yes. These numbers are emphasized in Figure 7 below.

1 Figure 7: Breakdown of incentive to non-incentive costs for the prudency period for Evergy Metro and
2 Evergy West



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4 **Q. Why is it important that non-incentive cost expenditures be as low as possible?**

5 A. When Evergy claims it has spent \$56 million on energy efficiency during the review period,
6 most people immediately believe at least the majority of those dollars went to tangible energy
7 efficiency measures (e.g., light bulbs, etc...) as opposed to administrative overhead and
8 promotional materials. Consider that non-profits are actually judged on how much donated
9 money actual goes to those it is intended to help. For example, the United Nations Children's
10 Fund ("UNICEF") boasts that less than 3% of every dollar spent goes to administrative costs
11 and that this claim has been verified by Charity Navigator and GlobalGiving.³

³ UNICEF (2020) About Us. Our Finances: Efficient and Verified. <https://www.unicefusa.org/about/finances>

1 We hold similar efficiency standards for our ratepayer-funded Low Income Weatherization
2 Assistance Program (“LIWAP”) funding. Evergy Metro’s Promotional Practice Income-
3 eligible Weatherization, Revised Tariff Sheet No. 43 states:

4 Program funds cannot be used for administrative costs except those incurred by the
5 Social Service Agency that is directly related to qualifying and assisting customers
6 under this program. The amount of reimburseable administrative costs per program
7 year **shall not exceed 13%** of the total program funds. (emphasis added)

8 Utility management has enormous control over the efficiency (or lack thereof) of its budget.
9 This is evident by Evergy’s historical cost allocation. It is inexcusable to hold non-profit
10 community action agencies that install energy efficiency measures to a 13% non-incentive
11 standard, but allow a utility to spend 60% of its budget on non-incentive costs. This
12 discrepancy is solely a reflection of Evergy’s inefficient managerial practices. Any company
13 should do better than this.

14 **Q. How do these inefficiencies play out at the individual program level? Are some programs
15 more inefficient than others?**

16 A. Yes, some programs are much more inefficient as others. Tables 1 and 2 provide a breakdown
17 of Evergy Metro and Evergy West by program, including how much non-incentive funds
18 needed to be expended to rebate \$1 for each program.

1 Table 1: Evergy Metro program cost breakdown April 1, 2018 through December 31, 2019

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Program	Incentives EE Rebates	Non-Incent Admin	Total Costs	% of Admin	How much more \$ to rebate \$1.00	Target Met Y/N
Low-Income Multi-Family	\$941,035	\$1,528,247	\$2,469,282	62%	\$1.62	N
Res. Thermostat	\$568,177	\$2,252,425	\$2,820,602	80%	\$3.96	N
Bus. On-Line Energy Audit		\$24,487	\$24,487	100%		N
Res. On-Line Energy Audit		\$115,871	\$115,871	100%		N
Home Energy Report		\$661,064	\$661,064	100%		N
Low-Income Home Energy Reports		\$206,527	\$206,527	100%		N
Block Bidding	\$50,652	\$320,967	\$371,619	86%	\$6.34	N
Strategic Energy Management	\$17,106	\$213,447	\$230,553	93%	\$12.48	N
Small Bus. Direct Install	\$1,832	\$82,382	\$84,214	98%	\$44.97	N
Bus. Thermostat	\$5,000	\$104,756	\$109,756	95%	\$20.95	N
Whole House Efficiency	\$1,457,402	\$1,415,122	\$2,872,524	49%	\$0.97	Y
Home Lighting Rebate	\$1,079,422	\$1,080,075	\$2,159,497	50%	\$1.00	Y
Bus. Standard	\$2,356,752	\$2,411,686	\$4,768,438	51%	\$1.02	Y
Bus. Custom	\$4,003,359	\$2,755,304	\$6,758,663	41%	\$0.69	Y
Bus. Demand Response	\$1,076,639	\$411,811	\$1,488,450	28%	\$0.38	Y
Research and Pilot		\$727,767		100%		NA
Total	\$11,557,376	\$14,311,933	\$25,869,309	55%	\$1.24	5 of 15

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Table 2: Evergy West program cost breakdown April 1, 2018 through December 31, 2019

Program	Incentives EE Rebates	Non-Incent Admin	Total Costs	% of Admin	How much more \$ to rebate \$1.00	Target Met Y/N
Low-Income Multi-Family	\$608,167	\$1,228,747	\$1,836,915	67%	\$2.02	N
Res. Thermostat	\$648,148	\$3,267,072	\$3,915,219	83%	\$6.04	N
Bus. On-Line Energy Audit		\$22,893	\$22,893	100%		N
Res. On-Line Energy Audit		\$123,381	\$123,381	100%		N
Home Energy Report		\$1,237,353	\$1,237,353	100%		N
Block Bidding	\$516,194	\$351,809	\$868,003	41%	\$0.68	N
Strategic Energy Management	\$6,695	\$280,305	\$287,000	98%	\$41.87	N
Small Bus. Direct Install	\$22,344	\$89,191	\$111,534	80%	\$3.99	N
Bus. Thermostat	\$6,800	\$197,632	\$204,432	97%	\$29.06	Y
Whole House Efficiency	\$2,029,897	\$2,820,581	\$4,850,477	58%	\$1.39	Y
Home Lighting Rebate	\$1,122,242	\$1,039,252	\$2,161,495	48%	\$0.93	Y
Bus. Standard	\$2,246,087	\$1,971,613	\$4,217,700	47%	\$0.88	Y
Bus. Custom	\$2,173,584	\$2,141,581	\$4,315,166	50%	\$0.99	Y
Bus. Demand Response	\$2,936,287	\$1,839,188	\$4,775,475	39%	\$0.63	N
Research and Pilot		\$829,382	\$829,382	100%		NA
Total	\$12,316,445	\$17,439,980	\$29,756,425	59%	\$1.42	5 of 14

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1 **Q. What should the Commission note from these tables?**

2 A. Many programs failed to meet their targets and are widely inefficient if judged solely on
3 whether money spent actually results in energy efficiency realized. Consider that Evergy Metro
4 spent \$82,382 dollars in overhead to spend down \$1,832 for its small business direct install
5 program. Stated differently, to have \$1.00 actually go to a tangible energy efficiency measure,
6 ratepayers had to spend \$44.97 in additional costs for that program.

7 If energy efficiency benefits everyone, it should not be too much to ask that the utility spend
8 energy efficiency funding on... energy efficiency to maximize benefits. Yet Evergy
9 management is seemingly not interested in maximizing efficiencies in program
10 implementation.

11 **Q. What is your recommendation to the Commission based on this information?**

12 A. I do not expect UNICEF or LIWAP levels of efficiency.⁴ But it is completely unacceptable to
13 have a utility spend more funds on non-incentive costs than actual incentives. At a minimum
14 Evergy should be in line with utilities across the country.

15 I recommend an additional \$1,930,392 in disallowance for Evergy Missouri West in addition
16 to the full disallowance identified by Staff. If my full recommendation is adopted it would
17 result in a 50/50 split in non-incentive and incentive costs for the prudency review period for
18 both utilities. A breakdown of that calculation is below; the bolded amounts denote a
19 recommended disallowance:

20 Evergy West breakdown:

Incentives	\$12,316,445
Non-Incentives	\$17,439,980
Incentive + Non-Incentive = Total	\$29,756,425
(Staff Disallowance)	(\$2,363,761.45)
(Research & Pilot funds)	(\$829,382)
(Additional disallowance to reach 50/50)	(\$1,930,392)
Adjusted non-incentive total	\$12,316,445

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⁴ Although it does beg the question why the local non-profit is so much better at its job than the for-profit implementer.

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Evergy Metro breakdown:

Incentives	\$11,557,376
Non-Incentives	\$14,311,933
Incentive + Non-Incentive = Total	\$25,869,309
(Staff Disallowance)	(\$2,134,986.29)
(Research & Pilot funds)	(\$727,762)
(Additional disallowance to reach 50/50)	Not needed
Adjusted non-incentive total	\$11,449,184.71

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Q. What should the Commission note from your calculations?

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A. First, this disallowance calculation is dependent on the Commission agreeing with the Staff's initial recommendation in full. Second, I have not penalized the Company for the Research and Pilot expenditures and I am assuming full disallowance of Staff's recommendation as an offset for non-incentive costs alone. Third, I have also stopped short of recommending a disallowance of non-incentive costs above 50%. This is a 10% greater inefficiency level than the national average. Fourth, I have also not made specific disallowance recommendations on inefficient programs. In short, my calculations are very favorable to the Company relative to its performance. The intent here is to prevent future inefficient behavior more than penalizing past inefficient and imprudent performance. I want the utility to do a better job in achieving what it claims to be doing.

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Q. Do you have any further recommendations to the Commission on this issue?

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A. I recommend that the Commission demand better from its utilities moving forward. Specifically, the Commission should order that utilities participating in ratepayer-funded energy efficiency programs have more than a 5% excess non-incentive budget expenditure deviation from the three-year national average. And any amount above that should be considered imprudent as a general framework for utilities and stakeholders to be aware of in the near future.

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1 **III. RESIDENTIAL DEMAND RESPONSE**

2 **Q. Staff recommended a large disallowance related to the two residential demand response**
3 **programs. Did they provide any historical context for these programs?**

4 A. Not beyond the prudence period in question. The Commission should be cognizant that there
5 are easily tens of thousands, probably hundreds of thousands of programmable thermostat's
6 that have been rebated or given away free of charge over the years (since 2004 under "Energy
7 Optimizer"). It is arguably one of the largest and oldest programs of its size in the United States.
8 In fact, on June 7, 2017 *UtilityDive* headlined an article titled:

9 "KCP&L thermostat program shows how regulatory design can make or break DSM"

10 Within that article the following statement is made:

11 KCP&L offers a tempting lineup of incentives to attract customers to the program.

12 The thermostat is free, participation is worth an annual \$25 bill credit, and then
13 there are energy savings. And if customers can install the thermostat themselves,
14 it's another \$50.

15 That may seem like a lot, but the program has been rolled out under the Missouri
16 Energy Efficiency Investment Act (MEEIA) which allowed the utility to recover
17 its investment by accounting for multiple value streams beginning in 2014.

18 The article is correct in that the Company's incentive design is "a lot." Interestingly, neither
19 this article nor any of the other publically available articles I reviewed on the historical program
20 ever mention how much energy or demand savings were achieved. The measure of success
21 from the Company has always emphasized how many customers received a free, subsidized
22 programmable thermostat and added bill credits. Never has the Company measured success by
23 how many events were called, how much demand savings were achieved or how many
24 customers actually participated.

1 **Q. But is not distributing the programmable thermostat a benefit for customers?**

2 A. Subsidizing programmable thermostats for demand-response programs does not benefit all
3 customers if no actual demand response is called. The minimal energy savings associated with
4 a programmable thermostat come nowhere close to offsetting the \$250 retail value and
5 additional credit allowances given away for free. In 2016, Evergy called eight curtailment
6 events through its Residential Demand-Response program. In 2017 Evergy called only three,
7 and by 2018, that number dropped to two curtailment events. Meanwhile, Evergy continued to
8 spend ratepayer money on more and more programmable thermostats that would never be
9 utilized to offset their costs.

10 Ratepayers have historically, and are continuing still, to pay millions of dollars to put out tens
11 of thousands of programmable thermostats. However, the Company seemingly has zero
12 intention of actually utilizing those thermostats to produce benefits for customers beyond “test
13 events.” Keep in mind that customers can always elect to override the Company-controlled
14 event if they choose to with zero repercussions. There is literally a multi-million dollar
15 residential demand response infrastructure in place that could shave off expensive peak
16 demand during the year that goes unused.

17 **Q. What else should the Commission be aware of in considering this issue?**

18 A. Both Staff and OPC raised these concerns in Evergy’s most recently approved MEEIA docket.
19 However, these concerns were not addressed in the Report and Order and no subsequent
20 changes were made to the residential programmable thermostat programs from what the
21 Company filed initially. Until this issue is addressed by the Commission, ratepayers will
22 continue to be harmed and will most likely continue subsidizing each subsequent generation
23 of “smart” programmable thermostat based on a criteria (how many can we give away if we
24 pay people to take it) that is inconsistent with the goal of realizing benefits for all customers
25 regardless of participation. Until the Commission regulates this poor performance, the
26 Company will continue to exploit this program for its personal gain.

1 **Q. Does this conclude your testimony?**

2 A. Yes.

CASE PARTICPATION OF
GEOFF MARKE, PH.D.

Company Name	Employed Agency	Case Number	Issues
Evergy Missouri West & Evergy Missouri Metro	Office of Public Counsel (OPC)	EO-2020-0227	Rebuttal: Inefficient Management / Residential Demand Response
Working Case: To consider best practices for recovery of past-due utility customer payments after the COVID-19 pandemic	OPC	AW-2020-0356	Memorandum: Response to Staff Report on COVID-19 Past-Due Utility Customer Payments
Evergy Missouri West & Evergy Missouri Metro	OPC	EU-2020-0350	Rebuttal: Authorized Accounting Order for: Lost Revenues / COVID-19 Expenses / Bad Debt Expense Surrebuttal: Disconnection Moratorium / Arrearage Management Plans / Economic Relief Pilot Program / Outreach / Energy Efficiency / Administrative Procedures
Empire District Electric Company	OPC	EO-2020-0284	Memorandum: Customer Savings Plan / Stateline Combined Cycle Upgrade / DSM / COVID-19 Impact on Modeling / Executive Order on Securing the US Bulk-Power System / SPP Effective Load Carrying Capability / All-Source RFP
Evergy Missouri West	OPC	EO-2020-0281	Memorandum: Wind Power PPAs / DSM / COVID-19 Impact on Modeling / Executive Order on Securing the US Bulk-Power System / SPP Effective Load Carrying Capability / Utility-Scale Solar / All-Source RFP
Evergy Missouri Metro	OPC	EO-2020-0280	Memorandum: Wind Power PPAs / DSM / COVID-19 Impact on Modeling / Executive Order on Securing the US Bulk-Power System / SPP Effective Load Carrying Capability / Utility-Scale Solar / All-Source RFP
Empire District Electric Company	OPC	ER-2019-0374	Direct: Cost and Quality of Service, Stranded Asset, AMI/CIS deployment Rebuttal: Customer Experience / Weather Normalization Rider / Energy Efficiency / Low-Income Pilot Program Rebuttal: Class Cost of Service / Rate Design / Low Income Pilot Program

			Surrebuttal: Cost and Quality of Service / Reliability Metrics / Asbury Power Plant / Rate Design & CCOS / DSM Programs
Union Electric Company d/b/a Ameren Missouri	OPC	EA-2019-0371	Rebuttal: Solar + Storage
Union Electric Company d/b/a Ameren Missouri	OPC	ER-2019-0335	Direct: Keeping Current Bill Assistance Program Rebuttal: Smart Energy Plan, Keeping Current, Coal Power Plants, CCOS, Rate Design, Pure Power RECs Surrebuttal: Coal Power Plants
Rule Making	OPC	AW-2020-0148	Memorandum: Residential Customer Disconnections and Data Standardization
Empire District Electric Company /Kansas City Power & Light & KCP&L Greater Missouri Operations Company/Union Electric Company d/b/a Ameren Missouri	OPC	EO-2020-0047 EO-2020-0046 EO-2020-0045 EO-2020-0044	Memorandum: Additive Manufacturing, Cement Block Battery Storage, Virtual Power Plant, Customer-Side Renewable Generation, Historical Review of energy forecasts (KCPL, GMO and Empire-Specific) and Rush Island and Labadie Power Plant Environmental Retrofits (Ameren specific)
Union Electric Company d/b/a Ameren Missouri	OPC	EA-2019-0309	Rebuttal: Need for the Wind Project/ Economic Valuation / Pre-Site Energy Assessment Omissions
KCP&L Greater Missouri Operations Company & Kansas City Power and Light Company	OPC	EO-2019-0132	Rebuttal: Response to KCPL’s MEEIA application, Equitable Energy Efficiency Baseline, WattTime: Automated Emissions Reduction, PAYS, Urban Heat Island Mitigation Surrebuttal: Market Potential Study, Single Family Low-Income
KCP&L Greater Missouri Operations Company	OPC	EC-2019-0200	Surrebuttal: Deferral Accounting and Stranded Assets
Union Electric Company d/b/a Ameren Missouri	OPC	ED-2019-0309	Memorandum: on the “Aluminum Smelter Rate”
KCP&L Greater Missouri Operations Company	OPC	EO-2019-0067	Rebuttal: Renewable Energy Credits
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2019-0314	Memorandum: Notice of Deficiency to Annual IRP Update
Rule Making	OPC	WX-2019-0380	Memorandum: on Affiliate Transaction Rules for Water Corporations
Working Case: Evaluate Potential Mechanisms for Facilitating Installation of Electric Vehicle Charging Stations	OPC	EW-2019-0229	Memorandum: on Policy Surrounding Electric Vehicles and Electric Vehicle Charging Stations
Rule Making	OPC	EX-2019-0050	Memorandum on Solar Rebates and Low Income Customers

Union Electric Company d/b/a Ameren Missouri	OPC	GR-2019-0077	Direct: Billing Practices Rebuttal: Rate Design, Decoupling, Energy Efficiency, Weatherization, CHP
Empire District Electric Company	OPC	EA-2019-0010	Rebuttal: Levelized Cost of Energy, Wind in the Southwest Power Pool Surrebuttal: SPP Market Conditions, Property Taxes, Customer Protections
Empire District Electric Company /Kansas City Power & Light & KCP&L Greater Missouri Operations Company/Union Electric Company d/b/a Ameren Missouri	OPC	EO-2019-0066 EO-2019-0065 EO-2019-0064 EO-2019-0063	Memorandum: Additive Manufacturing and Cement Block Battery Storage (IRP: Special Contemporary Topics)
Working Case: Allocation of Solar Rebates from SB 564	OPC	EW-2019-0002	Memorandum on Solar Rebates and Low Income Customers
Rule Making Workshop	OPC	AW-2018-0393	Memorandum: Supplemental Response to Staff Questions pertaining to Rules Governing the Use of Customer Information
Union Electric Company d/b/a Ameren Missouri	OPC	ET-2018-0132	Rebuttal: Line Extension / Charge Ahead – Business Solutions / Charge Ahead – Electric Vehicle Infrastructure Supplemental Rebuttal: EV Adoption Performance Base Metric
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2018-0211	Rebuttal: MEEIA Cycle III Application Surrebuttal: Cost Effectiveness Tests / Equitable Energy Efficiency Baseline
Union Electric Company d/b/a Ameren Missouri	OPC	EA-2018-0202	Rebuttal: Renewable Energy Standard Rate Adjustment Mechanism/Conservation Surrebuttal: Endangered and Protected Species
Kansas City Power & Light & KCP&L Greater Missouri Operations Company	OPC	ER-2018-0145 ER-2018-0146	Direct: Smart Grid Data Privacy Protections Rebuttal: Clean Charge Network / Community Solar / Low Income Community Solar / PAYS/ Weatherization/Economic Relief Pilot Program/Economic Development Rider/Customer Information System and Billing Rebuttal: TOU Rates / IBR Rates / Customer Charge / Restoration Charge Surrebuttal: KCPL-GMO Consolidation / Demand Response / Clean Charge Network / One CIS: Privacy, TOU Rates, Billing & Customer Experience

Union Electric Company d/b/a Ameren Missouri	OPC	ET-2018-0063	Rebuttal: Green Tariff
Liberty Utilities	OPC	GR-2018-0013	Surrebuttal: Decoupling
Empire District Electric Company	OPC	EO-2018-0092	Rebuttal: Overview of proposal/ MO PSC regulatory activity / Federal Regulatory Activity / SPP Activity and Modeling / Ancillary Considerations Surrebuttal Response to parties Affidavit in opposition to the non-unanimous stipulation and agreement
Great Plains Energy Incorporated, Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company, and Westar Energy, Inc.	OPC	EM-2018-0012	Rebuttal: Merger Commitments and Conditions / Outstanding Concerns
Missouri American Water	OPC	WR-2017-0285	Direct: Future Test Year/ Cost Allocation Manual and Affiliate Transaction Rules for Large Water Utilities / Lead Line Replacement Direct: Rate Design / Cost Allocation of Lead Line Replacement Rebuttal: Lead Line Replacement / Future Test Year/ Decoupling / Residential Usage / Public- Private Coordination Rebuttal: Rate Design Surrebuttal: Affiliate Transaction Rules / Decoupling / Inclining Block Rates / Future Test Year / Single Tariff Pricing / Lead Line Replacement
Missouri Gas Energy / Laclede Gas Company	OPC	GR-2017-0216 GR-2017-0215	Rebuttal: Decoupling / Rate Design / Customer Confidentiality / Line Extension in Unserved and Underserved Areas / Economic Development Rider & Special Contracts Surrebuttal: Pay for Performance / Alagasco & EnergySouth Savings / Decoupling / Rate Design / Energy Efficiency / Economic Development Rider: Combined Heat & Power
Indian Hills Utility	OPC	WR-2017-0259	Direct: Rate Design
Rule Making	OPC	EW-2018-0078	Memorandum: Cogeneration and net metering - Disclaimer Language regarding rooftop solar
Empire District Electric Company	OPC	EO-2018-0048	Memorandum: Integrated Resource Planning: Special Contemporary Topics Comments
Kansas City Power & Light	OPC	EO-2018-0046	Memorandum: Integrated Resource Planning: Special Contemporary Topics Comments
KCP&L Greater Missouri Operations Company	OPC	EO-2018-0045	Memorandum: Integrated Resource Planning: Special Contemporary Topics Comments

Missouri American Water	OPC	WU-2017-0296	Direct: Lead line replacement pilot program Rebuttal: Lead line replacement pilot program Surrebuttal: Lead line replacement pilot program
KCP&L Greater Missouri Operations Company	OPC	EO-2017-0230	Memorandum on Integrated Resource Plan, preferred plan update
Working Case: Emerging Issues in Utility Regulation	OPC	EW-2017-0245	Memorandum on Emerging Issues in Utility Regulation / Presentation: Inclining Block Rate Design Considerations Presentation: Missouri Integrated Resource Planning: And the search for the “preferred plan.” Memorandum: Draft Rule 4 CSR 240-22.055 DER Resource Planning
Rule Making	OPC	EX-2016-0334	Memorandum on Missouri Energy Efficiency Investment Act Rule Revisions
Great Plains Energy Incorporated, Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company, and Westar Energy, Inc.	OPC	EE-2017-0113 / EM-2017-0226	Direct: Employment within Missouri / Independent Third Party Management Audits / Corporate Social Responsibility
Union Electric Company d/b/a Ameren Missouri	OPC	ET-2016-0246	Rebuttal: EV Charging Station Policy Surrebuttal: EV Charging Station Policy
Kansas City Power & Light		ER-2016-0156	Direct: Consumer Disclaimer Direct: Response to Commission Directed Questions Rebuttal: Customer Experience / Greenwood Solar Facility / Dues and Donations / Electric Vehicle Charging Stations Rebuttal: Class Cost of Service / Rate Design Surrebuttal: Clean Charge Network / Economic Relief Pilot Program / EEI Dues / EPRI Dues
Union Electric Company d/b/a Ameren Missouri	OPC	ER-2016-0179	Direct: Consumer Disclaimer / Transparent Billing Practices / MEEIA Low-Income Exemption Direct: Rate Design Rebuttal: Low-Income Programs / Advertising / EEI Dues Rebuttal: Grid-Access Charge / Inclining Block Rates / Economic Development Riders
KCP&L Greater Missouri Operations Company	OPC	ER-2016-0156	Direct: Consumer Disclaimer Rebuttal: Regulatory Policy / Customer Experience / Historical & Projected Customer Usage / Rate Design / Low-Income Programs

			Surrebuttal: Rate Design / MEEIA Annualization / Customer Disclaimer / Greenwood Solar Facility / RESRAM / Low-Income Programs
Empire District Electric Company, Empire District Gas Company, Liberty Utilities (Central) Company, Liberty Sub-Corp.	OPC	EM-2016-0213	Rebuttal: Response to Merger Impact Surrebuttal: Resource Portfolio / Transition Plan
Working Case: Polices to Improve Electric Regulation	OPC	EW-2016-0313	Memorandum on Performance-Based and Formula Rate Design
Working Case: Electric Vehicle Charging Facilities	OPC	EW-2016-0123	Memorandum on Policy Considerations of EV stations in rate base
Empire District Electric Company	OPC	ER-2016-0023	Rebuttal: Rate Design, Demand-Side Management, Low-Income Weatherization Surrebuttal: Demand-Side Management, Low-Income Weatherization, Monthly Bill Average
Missouri American Water	OPC	WR-2015-0301	Direct: Consolidated Tariff Pricing / Rate Design Study Rebuttal: District Consolidation/Rate Design/Residential Usage/Decoupling Rebuttal: Demand-Side Management (DSM)/ Supply-Side Management (SSM) Surrebuttal: District Consolidation/Decoupling Mechanism/Residential Usage/SSM/DSM/Special Contracts
Working Case: Decoupling Mechanism	OPC	AW-2015-0282	Memorandum: Response to Comments
Rule Making	OPC	EW-2015-0105	Missouri Energy Efficiency Investment Act Rule Revisions, Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0084	Triennial Integrated Resource Planning Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0055	Rebuttal: Demand-Side Investment Mechanism / MEEIA Cycle II Application Surrebuttal: Potential Study / Overearnings / Program Design Supplemental Direct: Third-party mediator (Delphi Panel) / Performance Incentive Supplemental Rebuttal: Select Differences between Stipulations

			Rebuttal: Pre-Pay Billing
The Empire District Electric Company	OPC	EO-2015-0042	Integrated Resource Planning: Special Contemporary Topics Comments
KCP&L Greater Missouri Operations Company	OPC	EO-2015-0041	Integrated Resource Planning: Special Contemporary Topics Comments
Kansas City Power & Light	OPC	EO-2015-0040	Integrated Resource Planning: Special Contemporary Topics Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0039	Integrated Resource Planning: Special Contemporary Topics Comments
Kansas City Power & Light	OPC	ER-2014-0370	Direct (Revenue Requirement): Solar Rebates Rebuttal: Rate Design / Low-Income Weatherization / Solar Rebates Surrebuttal: Economic Considerations / Rate Design / Cyber Security Tracker
Rule Making	OPC	EX-2014-0352	Memorandum Net Metering and Renewable Energy Standard Rule Revisions,
The Empire District Electric Company	OPC	ER-2014-0351	Rebuttal: Rate Design/Energy Efficiency and Low-Income Considerations
Rule Making	OPC	AW-2014-0329	Utility Pay Stations and Loan Companies, Rule Drafting, Comments
Union Electric Company d/b/a Ameren Missouri	OPC	ER-2014-0258	Direct: Rate Design/Cost of Service Study/Economic Development Rider Rebuttal: Rate Design/ Cost of Service/ Low Income Considerations Surrebuttal: Rate Design/ Cost-of-Service/ Economic Development Rider
KCP&L Greater Missouri Operations Company	OPC	EO-2014-0189	Rebuttal: Sufficiency of Filing Surrebuttal: Sufficiency of Filing
KCP&L Greater Missouri Operations Company	OPC	EO-2014-0151	Renewable Energy Standard Rate Adjustment Mechanism (RESRAM) Comments
Liberty Natural Gas	OPC	GR-2014-0152	Surrebuttal: Energy Efficiency
Summit Natural Gas	OPC	GR-2014-0086	Rebuttal: Energy Efficiency Surrebuttal: Energy Efficiency
Union Electric Company d/b/a Ameren Missouri	OPC	ER-2012-0142	Direct: PY2013 EM&V results / Rebound Effect Rebuttal: PY2013 EM&V results Surrebuttal: PY2013 EM&V results Direct: Cycle I Performance Incentive Rebuttal: Cycle I Performance Incentive
Kansas City Power & Light	Missouri Public Service Commission Staff	EO-2014-0095	Rebuttal: MEEIA Cycle I Application testimony adopted
KCP&L Greater Missouri Operations Company	Missouri Division of Energy (DE)	EO-2014-0065	Integrated Resource Planning: Special Contemporary Topics Comments

Kansas City Power & Light	DE	EO-2014-0064	Integrated Resource Planning: Special Contemporary Topics Comments
The Empire District Electric Company	DE	EO-2014-0063	Integrated Resource Planning: Special Contemporary Topics Comments
Union Electric Company d/b/a Ameren Missouri	DE	EO-2014-0062	Integrated Resource Planning: Special Contemporary Topics Comments
The Empire District Electric Company	DE	EO-2013-0547	Triennial Integrated Resource Planning Comments
Working Case: State-Wide Advisory Collaborative	OPC	EW-2013-0519	Presentation: Does Better Information Lead to Better Choices? Evidence from Energy-Efficiency Labels Presentation: Customer Education & Demand-Side Management Presentation: MEEIA: Strengths, Weaknesses, Opportunities and Threats (SWOT) Analysis
Independence-Missouri	OPC	Indy Energy Forum 2014	Presentation: Energy Efficiency
Independence-Missouri	OPC	Indy Energy Forum 2015	Presentation: Rate Design
NARUC – 2017 Winter, Washington D.C.	OPC	Committee on Consumer Affairs	Presentation: PAYS Tariff On-Bill Financing
NASUCA – 2017 Mid-Year, Denver	OPC	Committee on Water Regulation	Presentation: Regulatory Issues Related to Lead-Line Replacement of Water Systems
NASUCA – 2017 Annual Baltimore,	OPC	Committee on Utility Accounting	Presentation: Lead Line Replacement Accounting and Cost Allocation
NARUC – 2018 Annual, Orlando	OPC	Committee on Consumer Affairs	Presentation: PAYS Tariff On-Bill Financing Opportunities & Challenges
Critical Consumer Issues Forum (CCIF)—New Orleans	OPC	Examining Policies for Delivering Smart Mobility	Presentation: Missouri EV Charging Station Policy in 4 Acts: Missouri Office of the Public Counsel Perspective
Michigan State, Institute of Public Utilities, 2019	OPC	Camp NARUC: Fundamentals	Presentation: Revenue Requirement
NARUC/US AID, Republic of North Macedonia, Skopje 2019	OPC	NARUC /US AID: Cybersecurity	Presentation: Case Study: The Missouri Experience, Cybersecurity and Data Privacy
Kansas, Clean Energy Business Council (“CEBC”), 2020	OPC	Climate and Energy Project	Presentation: Energy Efficiency and Pay as You Save (PAYS)
Michigan State, Institute of Public Utilities, 2020	OPC	Camp NARUC: Fundamentals	Presentation: Fundamentals of Economic Regulation / Performance Base Regulation