

**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 Application for Authority to ) **File No. EO-2023-0369**  
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 Application for Authority to ) **File No. EO-2023-0370**  
Establish a Demand-Side Programs )  
Investment Mechanism )

**EVERGY RESPONSE TO STAFF RECOMMENDATION**

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) (collectively, the “Company” or “Evergy”), *Response to Staff Recommendation* which was by the Commission Staff (“Staff”) on December 6, 2024. In support of this pleading, Evergy states as follows:

1. In Evergy’s *Response to Order Directing Filing* filed on November 26, 2024, Evergy provided the lengthy procedural history underlying the tariffs at issue in this case, and it is unnecessary to repeat that background information herein.

2. On December 6, 2024, Staff filed its Staff Recommendation related to the substitute tariffs filed on that were filed by Evergy on November 25, 2024, which stated that “The information provided by Evergy answered the concerns Staff had with the Net Margin Revenue values, but Staff remains concerned about the load shape values. Evergy has not provided support sufficient to verify the accuracy of the load shapes to be included in the DSIM tariff sheets.” (Staff Recommendation, p. 3, ¶8)

3. The load shapes were unnecessary to be addressed in the Non-Unanimous Stipulation and Agreement filed by Evergy, OPC and Renew Missouri on September 27, 2024. In past MEEIA cycles involving Evergy programs, load shapes have been used as projections to be used in calculating the Throughput Disincentive (“TD”) for the DSIM rate adjustment. The load shape projections are based upon weighted averages of the predicted program participation applied to end use measures load shapes. From Evergy’s perspective, the approach used in previous MEEIA cycles has worked well in the past and it does not believe that a new approach is necessary for its MEEIA Cycle 4.

4. Notwithstanding past practices for Evergy MEEIA programs, Staff is now suggesting that Evergy “revise its tariffs to an approach consistent with that used in the Ameren Missouri MEEIA tariffs, such that load shapes for end-use measures and classes are relied upon, but that the mix of measures is a monthly input to weight the load shape used for TD calculations.” (Staff Recommendation, p. 5, ¶15)

5. The Commission should reject Staff’s recommendation that tariff sheets 49.5 and 138.25 be rejected and then revised by the Company while the MEEIA program tariff sheets are approved and in effect. All of the compliance tariffs filed by the Company comply with the September 27, 2024 Non-Unanimous Stipulation and Agreement (“Agreement”). Staff recognizes in paragraph 3 and 14 of its Recommendation that the compliance tariffs comply with the Agreement.

6. However should the Commission agree with paragraph 17 of the Staff Recommendation, the Company is willing to work with Staff to file revised versions of these two tariff sheets which include references to end-use load shapes, by class, for only those programs and measures addressed in the Agreement and include language similar to that found in the Ameren

Missouri tariff which relies on actual measure installations for the DSIM calculation. The Company believes that this change in approach to the load shapes at this juncture would take time to develop and implement.:

7. As far as Staff's suggestions in paragraph 19 of the Staff Recommendation, the Company does not believe that Staff's Appendix A and Appendix B fully capture the list of measures by program. The Company only received these lists last Friday and is still evaluating them. The Company will work with Staff to reconcile Appendix A and Appendix B with the Company's next TRM filing.

8. Evergy agrees that it is important to avoid a gap in MEEIA programs since such programs cannot be easily turned off and then subsequently resurrected after the load shapes are finally agreed to by Staff. As a result, Evergy recommends that the Commission approve the *Non-Unanimous Stipulation and Agreement* filed on September 27, 2024, as well as the compliance tariffs filed on November 25, 2024 and the EMM substitute tariffs filed December 10, 2024,

**WHEREFORE**, Evergy respectfully renews its request that the Commission approve the Agreement filed on September 27, 2024, and the compliance tariffs which were filed on November 25, 2024 as well as the EMM December 10, 2024 substitute tariffs, to be effective on January 1, 2025, as discussed herein.

Respectfully submitted,

*/s/ Roger W. Steiner*

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**ATTORNEYS FOR EVERGY MISSOURI  
METRO AND EVERGY MISSOURI WEST**

**CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing have been e-mailed to counsel of record for all parties this 10<sup>th</sup> day of December 2024.

*/s/ Roger W. Steiner*

Roger W. Steiner