

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

In the Matter of the Application of Evergy)	
Metro, Inc. d/b/a Evergy Missouri Metro and)	
Evergy Missouri West, Inc. d/b/a Evergy)	No.ET-2022-0145
Missouri West for Approval of the Income-)	
Eligible Weatherization Tariff and Automation)	
of the Income-Eligible Weatherization Program)	

**AMENDED APPLICATION OF EVERGY MISSOURI METRO AND EVERGY
MISSOURI WEST FOR APPROVAL OF THE INCOME-ELIGIBLE
WEATHERIZATION TARIFF WITH AN EFFECTIVE DATE OF DECEMBER 31, 2021,
AUTOMATION OF THE INCOME-ELIGIBLE WEATHERIZATION PROGRAM,
AND MOTION FOR VARIANCE OF 60-DAY NOTICE**

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc. (“Evergy Missouri West”) (collectively, “Evergy” or the “Companies”), and submit this *Amended Application for Authorization for Approval of the Income-Eligible Weatherization (IEW) Tariff, Automation of the IEW Program, and Motion for Variance of 60-Day Notice* (“Amended Application”) to the Missouri Public Service Commission (“Commission”). Evergy also requests, for good cause shown, a variance of the 60-day notice requirement of 20 CSR 4240-4.017(1)(D). In support of the Amended Application, Evergy states as follows:

I. General Information

1. Evergy Missouri Metro is a Missouri corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. It is engaged in the generation, transmission, distribution, and sale of electricity in western Missouri and eastern Kansas, operating primarily in the Kansas City metropolitan area. Evergy Missouri Metro is an “electrical corporation” and a “public utility” subject to the jurisdiction, supervision, and control of the Commission under Chapters 386 and 393.

2. Evergy Missouri Metro's certificate of good standing was filed in Case No. EN-2020-0063 and is incorporated by reference pursuant to 20 CSR 4240-2.060(1)(G).

3. Evergy Missouri West is a Delaware corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. It is engaged in the generation, transmission, distribution, and sale of electricity in western Missouri, including the suburban Kansas City metropolitan area, St. Joseph, and surrounding counties. Evergy Missouri West is an "electrical corporation" and a "public utility" subject to the jurisdiction, supervision, and control of the Commission under Chapters 386 and 393.

4. A certificate of authority for a foreign corporation to do business Missouri was filed with the Commission in Case No. EN-2020-0064 and is incorporated by reference pursuant to 20 CSR 4240-2.060(1)(G).

5. Evergy Missouri Metro and Evergy Missouri West are wholly owned subsidiaries of Evergy, Inc. They have no annual reports or regulatory assessment fees that are overdue.

6. Evergy Missouri Metro has no pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involved customer services or rates, which action, judgment or decision has occurred within three years of the date of this application.

7. Evergy Missouri West has no pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involved customer services or rates, which action, judgment or decision has occurred within three years of the date of this application, except for Docket No. EC-2020-0252, *Barbara Edwards v. Evergy Missouri West*.

8. In addition to serving counsel named below, all correspondence, pleadings, notices, orders, and other communications regarding this proceeding should also be sent to:

Darrin R. Ives
Vice President, Regulatory Affairs
Evergy, Inc.
1200 Main Street
Kansas City MO 64105
(tel.) (816) 652-1200
Darrin.Ives@evergy.com

Anthony R. Westenkirchner
Senior Regulatory Paralegal
Evergy, Inc.
1200 Main Street
Kansas City, MO 64105
(tel.) (816) 652-1100
Anthony.Westenkirchner@evergy.com

II. Amended Application for Authorization for Approval of the IEW Tariff and Automation of the IEW Program

9. Funding for the Companies income eligible weatherization (“IEW”) programs was most recently established in the Companies’ last rate cases, ER-2018-0145 and ER-2018-0146. Evergy Missouri Metro was authorized to spend \$573,888 and Evergy Missouri West was authorized to spend \$500,000 on the programs and these funds are collected through current rates. The Company added an additional \$116,674 and \$196,000 for Evergy Metro and Evergy West respectively of unspent IEW funds into the 2020 budget for program year 2020. The funds are spent through social service agencies whose contract terms run from January 1 through December 31 of the current year.

10. The social service agencies provide energy conservation measures as defined in the cooperative agreement to Evergy customers on a first come, first served basis. In addition, the social service agencies are currently administering the conservation programs in conformance with the existing program procedures and in conformance with the Missouri Department of Natural Resources-Division of Energy (“DE”).

11. The social service agencies had difficulty spending the IEW budgets in 2020 and 2021 due to the impact of COVID-19 on their ability to perform IEW upgrade projects. The recent COVID-19 pandemic resulted in social service agencies inability to spend funds because social distancing restrictions reduced the amount of home visits and inspections. Even prior to COVID-19, many of the social service agencies were having challenges spending their budgets due to limiting income requirements, difficulty in attracting and keeping qualified workers, the lengthy approval process, issues with home repairs that prevent weatherization from occurring (such as leaking roofs and asbestos), term of service, annual electricity consumption requirements and restrictions limiting work in homes that have had IEW projects performed within the past twenty years.

12. The Companies seek to revise the current IEW tariffs to address these six key challenges the agencies are currently facing. First, the Companies propose to broaden the scope around income requirements currently set forth by the U.S. Department of Energy's (DOE) Weatherization Assistance Program (WAP). Currently applicants must be at or below 200% of the poverty income guidelines to qualify for assistance. Evergy is proposing to also include the Low-Income Energy Assistance Program (LIHEAP) criteria, of which is set at 60% of state median income today. The current IEW income guidelines prevent approximately 40% of households that apply from qualifying for weatherization assistance. Since the administrative functions and the funding for IEW programs are not federally sourced, the agencies do not need to adhere to the same guidelines for spending the Evergy funds as necessary for spending federally administered or sourced funds. Therefore, agencies will not have to adhere to the US DOE guidelines for Evergy weatherization projects, which may be solely funded by Evergy.

Secondly, agencies, at their discretion, can use Evergy funds to weatherize properties that have historically been passed over due to eligibility related to date-last-weatherized or reasonable health and hazard conditions.

The third and fourth adjustments the Company proposes are removing the years of service and kWh requirements. The IEW program was previously offered within the Companies Missouri Energy Efficiency Investment Act (“MEEIA”) portfolio.¹ However, since the IEW program is no longer a part of the Companies MEEIA portfolio, this requirement is no longer necessary.

The fifth change Evergy is seeking will remove the barrier for homes to participate that have been weatherized in the past 20 years; allowing upgrades as identified and needed through the agency process regardless of previous IEW projects.

The final tariff adjustment that Evergy proposes will allow agencies to use a portion of the budgeted funds to attract and retain talent, as well as to incentivize their staff.

With these proposed changes, the Company believes the agencies will be able to utilize more of the program’s budget and service more customers. Agencies would be able to qualify more customers, as well as attract and retain more qualified workers. The Company will continue to comply with the merger stipulation and agreement to pay agencies \$300,000 per year for ten years, which is payable in June or July, and is used for administrative costs. This would assure agencies that they can depend on this funding that has already been planned and budgeted for administrative tasks. To facilitate the proposed changes, Evergy would amend current social service agency cooperative agreements.

¹ See, Report and Order on Kansas City Power & Light Company’s Request for Authority to Implement a General Rate Increase for Electric Service, Issued September 2, 2015; Docket No. ER-2014-0370, p.102.

13. Evergy also proposes a one-time allocation of program funds, totaling \$24,320, to work with a vendor to build an application that will help automate processes within the program. Currently, Income-Eligible Weatherization approval and invoice processing requires several days of manual entries. Automation would allow agencies to receive approvals in real-time and begin the weatherization process. Automation would also speed up the processing of customer payments. Evergy's tariffs state that, "Program funds cannot be used for administrative costs except those incurred by the Social Service Agency that is directly related to qualifying and assisting customers under this program." This one-time usage of funds is a direct cost that will be specifically identified with the automation project.

14. Staff does not oppose, and the Office of the Public Counsel has indicated that they support this Amended Application.

III. Request for Variance from 60-Day Notice

15. For good cause, Evergy also requests a variance from the 60-day notice provisions of 20 CSR 4240-4.017(1)(D) as a 60-day delay in the processing of this docket will only serve to delay the implementation of the revised program and delay the agencies from providing needed assistance to qualified customers during the crucial winter months. The verification of Mr. Ives that Evergy has had no communication with the Office of the Commission within the prior 150 days regarding any substantive issue likely to arise in this case is attached.

WHEREFORE, Evergy Missouri Metro and Evergy Missouri West request that the Commission grant it the authority to revise the IEW tariff with an effective date of December 31, 2021, allow for automation the IEW Program, and variance, for good cause, from the 60-day notice requirement of 20 CSR 4240-4.017(1)(D).

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner, MBN 39586
Evergy, Inc.
1200 Main Street
Kansas City, MO 64105
Phone: (816) 556-2791
roger.steiner@energy.com

**Attorney for Evergy Missouri Metro and Evergy
Missouri West**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed, or mailed, postage prepaid, to the Staff of the Commission and to the Office of the Public Counsel this 2nd day of December 2021.

/s/ Roger W. Steiner

**Attorney for Evergy Missouri Metro and Evergy
Missouri West**

VERIFICATION

COUNTY OF JACKSON)
)
STATE OF MISSOURI) SS

I, Darrin R. Ives, state that I am Vice President of Regulatory Affairs for Evergy, Inc., that I have reviewed the foregoing pleading, that I am familiar with its contents, that the statements contained therein are true and correct to the best of my knowledge and belief, and that Evergy has had no communication with the Office of the Commission within the prior 150 days regarding any substantive issues likely to arise in this case.

Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.²

Evergy, Inc.



Darrin R. Ives, Declarant

² See Letter from the Commission, dated March 24, 2020: “[A]ny person may file an affidavit in any matter before the Commission without being notarized so long as the affidavit contains the following declaration: [‘]Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.[’] _____ Signature of Declarant[.] This guidance applies both to pleadings filed in cases before the Commission and to required annual reports and statements of income.”