

Exhibit: \_\_\_\_\_  
Issues: Project Overview, Structure,  
Economics, Project Risks, Tariff  
Compliance, and Tartan Factors  
Witness: Kevin Brannan  
Type of Exhibit: Direct Testimony  
Sponsoring Party: Evergy Missouri Metro and  
Evergy Missouri West  
Case No. EA-2022-0043  
Date Testimony Prepared: December 14, 2021

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO:**

**EA-2022-0043**

**DIRECT TESTIMONY**

**OF**

**KEVIN BRANNAN**

**ON BEHALF OF**

**EVERGY MISSOURI METRO  
AND EVERGY MISSOURI WEST**

**Kansas City, Missouri  
December 2021**

**DIRECT TESTIMONY**

**OF**

**KEVIN BRANNAN**

**Case No. EA-2022-0043**

**I. INTRODUCTION**

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

2 A: My name is Kevin Brannan. My business address is 1200 Main Street, Kansas City,  
3 Missouri 64105.

4 **Q: By whom and in what capacity are you employed?**

5 A: I am employed by Evergy as Manager of Distributed Energy Resources (“DER”) Products.

6 **Q: On whose behalf are you testifying?**

7 A: I am testifying on behalf of Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy  
8 Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy  
9 Missouri West”) (collectively, the “Company” or “Evergy”) in support of the approval of  
10 the Company’s Missouri Certificate of Convenience and Necessity (“CCN”).

11 **Q: What are your responsibilities?**

12 A: My responsibilities with the Company include management and oversight of our  
13 Distributed Energy Resources (“DER”) programs planning, implementation and program  
14 execution.

15 **Q: Please describe your education, experience and employment history.**

16 A: I graduated from Webster University in 2005 with a B.S. in Business Management and an  
17 MBA in 2007. I began my career with Evergy in June 2006 as a Business Representative.

1 In this role I supported the account management needs of our Tier 2 Business Customers.  
2 In 2010 I joined our products team as a Product Manager. Over the next eight years I  
3 managed several of our residential, behavioral, commercial and industrial demand side  
4 management programs. In 2018 I was promoted to Manager of our Energy Efficiency  
5 products team. In 2020 I transitioned to my current role as Manager of our Distributed  
6 Energy Resources team.

7 **Q: Have you previously testified in a proceeding at the Missouri Public Service**  
8 **Commission (“Commission” or “PSC”) or before any other utility regulatory agency?**

9 A: No, I have not.

10 **Q: What is the purpose of your testimony?**

11 A: The purpose of my direct testimony is to support the approval of Evergy’s CCN  
12 application for a portion of a new solar generation plant (the “Project”). Specifically, I will  
13 address the project overview, structure, economics, project risks and compliance with the  
14 Solar Subscription Pilot Rider (“Schedule SSP”) tariff<sup>1</sup> and the Tartan factors.

15 **Q: Please summarize your testimony.**

16 A: My testimony details the steps taken to comply with Schedule SSP and an explanation of  
17 the benefits related to building a larger single solar array project to serve the needs of  
18 multiple and separate purposes. My testimony concludes that the Project meets the  
19 requirements outlined in Schedule SSP and the projected levelized cost of the Project is  
20 aligned with Schedule SSP and original Program estimates from 2018.

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<sup>1</sup> Evergy Missouri Metro, Solar Subscription Pilot Rider Schedule SSP “Schedule SSP”; P.S.C.MO. No. 7; Fourth Revised Sheet No. 39. Second Revised Sheet No. 39A, 39B, 39C; Third Revised Sheet No. 39D; effective December 6, 2018.

1 **Q: Are you sponsoring any schedules with your direct testimony?**

2 A: Yes. I will be providing the Company's solar revenue requirements model<sup>2</sup>.

3 **II. PROJECT OVERVIEW**

4 **Q: What needs will the Project serve?**

5 A: The Project fulfills a dual purpose. It will serve participating customers across Evergy's  
6 three rate jurisdictions<sup>3</sup> who are enrolled in the Schedule SSP program. It also fulfills the  
7 393.1665 RSMo<sup>4</sup> requirements for a minimum investment of \$4 million per Evergy  
8 Missouri jurisdiction in utility-owned solar generation.

9 **Q: Please clarify what portion of the Project is related to this CCN request?**

10 A: The portion of the Project that will serve the needs of Schedule SSP requires the Company  
11 to seek approval for a CCN from the Commission. This CCN request is attributable to the  
12 5 MW portion of the Project which will be utilized to serve the needs of customers under  
13 Schedule SSP. Per statute, the utility owned solar investment attributable to 393.1665  
14 RSMo. does not require a CCN<sup>5</sup>.

15 **Q: How will Evergy delineate between the respective costs for the Schedule SSP program  
16 across multiple rate jurisdictions as well as distinguish and separate the costs related  
17 to the portion of the Project required for 393.1665 RSMo. investment?**

18 A: The Project will be a joint ownership between Evergy Metro and Evergy Missouri West  
19 based on the percentage of the Project each utility will use for its purposes in fulfilling the  
20 requirements for Schedule SSP and 393.1665 RSMo. Each utility will utilize a cost

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<sup>2</sup> **Confidential Schedule 8 - Evergy Solar RR Model**, attached to the Application for CCN ("Application").

<sup>3</sup> Evergy Missouri Metro, Evergy Kansas Metro, and Evergy Missouri West

<sup>4</sup> (2) An electrical corporation with less than one million but more than two-hundred thousand Missouri electric customers shall invest in the aggregate no less than four million dollars in utility-owned solar facilities located in Missouri or in an adjacent state during the period between August 28, 2018, and December 31, 2023.

<sup>5</sup> 393.1665 (3) RSMo. An electrical corporation shall not be required to obtain the permission of the commission to construct the facilities required by this section, notwithstanding the provisions of section 393.170.

1 allocation split between the Schedule SSP and 393.1665 RSMo. projects, as well as a  
2 jurisdictional split between the respective service territories for their proportional share of  
3 each resource. I will address this ownership and cost allocation split later in my testimony.

4 **Q: What are the primary benefits of the Project?**

5 A: The Project provides the renewable resource that enables customers who signed up for the  
6 Schedule SSP tariff to begin receiving the renewable energy they desire. The Company  
7 evaluated multiple sites in Missouri as discussed later in my testimony. The primary  
8 benefits of the selected site are the unique economic drivers of the Hawthorn location.  
9 These include access to an existing interconnection, hosting capacity and Company-owned  
10 land. These factors supported the Company’s proposal of a single site option for the  
11 Schedule SSP program and 393.1665 RSMo requirement. Utilizing this site will provide a  
12 more economic end-result for Missouri customers.

13 **III. PROJECT STRUCTURE**

14 **Q: Why is the Company constructing one solar facility that serves several distinct**  
15 **purposes, multiple jurisdictions and various customer needs?**

16 A: Evergy is constructing one solar facility to meet the requirements outlined in Schedule SSP  
17 as well as to comply with 393.1665 RSMo. Schedule SSP requires the Company to “locate  
18 in the most economic Missouri location, selecting the alternative with the lowest cost for  
19 implementation”<sup>6</sup>, while 393.1665 RSMo. requires “an electrical corporation with less than  
20 one million but more than two hundred thousand Missouri electric customers to invest in

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<sup>6</sup> Evergy Missouri Metro, Solar Subscription Pilot Rider Schedule SSP “Schedule SSP”; P.S.C.MO. No. 7; Fourth Revised Sheet No. 39; effective December 6, 2018.

1 aggregate no less than four million dollars in utility owned solar facilities located in  
2 Missouri or in an adjacent state by the end of 2023”<sup>7</sup>.

3 As outlined in Company witness Rea’s testimony, the Hawthorn site was selected  
4 based on review of the multiple sites’ hosting capacity and associated cost of  
5 interconnection. Developing at one site for multiple purposes allows for a more efficient  
6 use of investment while providing a lower levelized cost of energy (“LCOE”) over the  
7 estimated useful life of the resource. The evaluation that the Company undertook resulted  
8 in determining that the Hawthorn site resulted in the most cost-effective option.

9 **Q: Please describe the ownership structure for the Project.**

10 A: The ownership structure is based on the weighted average of each jurisdiction’s percentage  
11 share of Schedule SSP and percentage share of the Project related to meeting the  
12 requirements of 393.1665 RSMo. The Company proposes joint ownership<sup>8</sup> between  
13 Evergy Metro and Evergy Missouri West for the Project. The Company has determined  
14 an ownership split of 66% to Evergy Metro and 34% to Evergy Missouri West.

15 Schedule SSP states that the solar investment will be split between the rate jurisdictions  
16 based on the same ratio as the expected customer subscriptions. Using this framework, the  
17 Company allocated costs to five separate buckets utilizing the jurisdictional subscribed  
18 share percentage for the Schedule SSP program for Evergy Missouri Metro, Evergy  
19 Missouri West and Evergy Kansas Metro and also incorporating 393.1665 RSMo.  
20 requirements for Evergy Missouri Metro and Evergy Missouri West. This results in the  
21 following allocations:

- 22
- 25% allocated to Evergy Missouri Metro for 393.1665 RSMo requirements;

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<sup>8</sup> Schedule 13 - Joint Ownership Agreement to be filed in this docket before the end of 2021.

- 1           ▪       25% allocated to Evergy Missouri West for 393.1665 RSMo requirements;
- 2           ▪       27% allocated to Evergy Kansas Metro subscribers (based on % of
- 3           subscribed blocks by participants<sup>9</sup>);
- 4           ▪       14% allocated to Evergy Missouri Metro subscribers (based on % of
- 5           subscribed blocks<sup>10</sup>); and
- 6           ▪       9% allocated to Evergy Missouri West subscribers (based on % of
- 7           subscribed blocks<sup>11</sup>).

8           Per Schedule SSP, these cost allocations will remain constant for the duration of the  
9           Project.

10 **Q:   Please explain how these cost allocations were determined.**

11 A:   Since Commission approval of the tariffs, the Company has recruited customers to enroll  
12   in Schedule SSP program to reach the 90 percent enrollment threshold condition set forth  
13   in the Missouri tariffs in order to build the solar array. Prior to submitting this CCN  
14   application request, the Company recently reaffirmed enrollee’s interest and intention to  
15   participate in the program given that some time had passed from when the first interested  
16   customers enrolled to ensure that the Company was still meeting the 90 percent threshold.  
17   Using the most recent enrollment figures, the Company applied the solar share percentages  
18   by jurisdiction and the equal Missouri jurisdictional allocations for 393.1665 RSMo<sup>12</sup>.

19 **Q:   How will the Schedule SSP and 393.1665 RSMo Projects differ?**

20 A:   The portion of the project subject to this CCN request will serve customers who have  
21   signed up to participate in the Company’s Schedule SSP tariffs. Schedule SSP will provide

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<sup>9</sup> Allocation totals were set on October 11, 2021.

<sup>10</sup> Ibid.

<sup>11</sup> Ibid.

<sup>12</sup> Ibid.

1 energy to customers that have enrolled in the Solar Subscription program to meet their  
2 renewable energy needs.

3 The 393.1665 RSMo portion of the Project will provide front of the meter energy  
4 to all Evergy Missouri Metro and Missouri West customers as a new resource and fulfills  
5 requirements for each Missouri utility to invest in aggregate no less than \$4 million in  
6 utility owned solar facilities located in Missouri or in an adjacent state by the end of 2023.  
7 Also, while not part of this CCN request, it is the Company's intention, as part of the  
8 planned January 2022 rate case filing, to propose that 1 MWac of the portion of the project  
9 built to fulfill the requirements of 393.1665 RSMo be allocated equally between Evergy  
10 Missouri Metro and Evergy Missouri West to meet low to moderate income ("LMI")  
11 customers' needs through a new pilot ("LMI Solar Subscription Pilot Program").

12 **Q: Why is Evergy proposing a LMI Solar Subscription Pilot Program in its upcoming**  
13 **rate case filings?**

14 **A:** In the 2018 Rate Cases, (ER-2018-0145 and ER-2018-0146), the Company proposed its  
15 first solar subscription program in Missouri that would be offered to all eligible customers  
16 and up to 5 MW. It was agreed upon by the signatories in the Rate Design Stipulation and  
17 Agreement in that case, that "the Company will consider building SB564-required solar at  
18 the same time/place with the understanding that that solar may be used for separate (low-  
19 income) projects". The Company finds great value in offering a pilot program to expand  
20 clean and affordable energy access to a demographic who otherwise might not participate.



1 **Q: How does the Company propose cost allocation would be handled for a possible LMI**  
2 **Solar Subscription Pilot Program?**

3 A: In the event a LMI Solar Subscription Pilot Program is approved in the Company's  
4 upcoming rate cases, the cost allocation for the 5 MW portion of the 10 MW Project built  
5 to comply with 393.1665 RSMo and split evenly across all Evergy Missouri Metro and  
6 Evergy Missouri West customers will be adjusted. It will be adjusted in that as low income  
7 customers sign up for the LMI Solar Subscription Pilot Program (up to 0.5 MW for each  
8 Missouri utility jurisdiction), a corresponding share of the cost is removed from the cost of  
9 service for all customers of that utility.

10 **Q: Why is the Company describing a potential future LMI Solar Subscription Pilot**  
11 **Program in this CCN request?**

12 A: As indicated above, the portion of the 10 MW solar project that will be utilized to fulfill  
13 the requirements of 393.1665 RSMo, as well as any subset of that portion of the project  
14 which may be carved out to serve a potential LMI Solar Subscription Pilot Program in the  
15 future, are not part of this CCN request. As the Company is building a common plant  
16 resource intended to serve multiple purposes and rate jurisdictions, the Company wants to  
17 be clear and transparent with the Commission on its plans for the entire resource.

#### 18 **IV. PROJECT ECONOMICS**

##### 19 **1. Modeling & Assumptions**

20 **Q: How have the economics of the Project been analyzed?**

21 A: The Company developed a revenue requirements model to determine the projected LCOE  
22 for Schedule SSP program participants based on the two costs components: program fixed

1 charge and a services and access charge. The services and access charge is defined in  
 2 Schedule SSP to be \$0.038 per kWh<sup>13</sup>.

3 **Q: Please describe the assumptions used for the modeling analysis.**

4  
 5 **A:** The Company evaluated 15 feasible sites in Missouri based on location, hosting capacity  
 6 (interconnection status) and site control. Levelized cost assumptions for the modeling  
 7 analysis included a series of inputs that included both solar array technical specifics and  
 8 financial assumptions.

<u>Solar Array - Technical</u>	<u>Solar Array - Financial</u>	<u>Financing</u>
<ul style="list-style-type: none"> <li>• capacity (MWac)</li> <li>• installed costs of capacity</li> <li>• net capacity factor</li> <li>• annual degradation</li> <li>• construction start date</li> <li>• in service date</li> <li>• useful life</li> </ul>	<ul style="list-style-type: none"> <li>• capital investment</li> <li>• O&amp;M</li> <li>• insurance</li> <li>• property tax</li> <li>• program administration</li> <li>• grid expense</li> </ul>	<ul style="list-style-type: none"> <li>• inflation</li> <li>• common equity</li> <li>• debt percentages</li> <li>• interest</li> <li>• weighted average cost of capital after tax</li> <li>• tax rate</li> <li>• investment tax credit amount and percentage</li> <li>• tax and project tax depreciable basis percentage and amount</li> </ul>

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<sup>13</sup> The services and access charge will be adjusted when rates are reset in future rate cases by the average percentage change to volumetric rates in future rate cases, or if a party provides a cost study demonstrating that it is unreasonable to adjust this charge.

1    **2. Analysis Results**

2    **Q:    How were the levelized costs calculated?**

3    A:    The levelized costs were determined by calculating the levelized revenue requirement  
4        divided by the levelized sales volume (MWh). Levelized revenue requirements were  
5        determined by taking the sum of the discount factor over the 25-year useful life of the array  
6        by the discounted revenue requirements. The levelized sales volume was calculated over  
7        the 25-year useful life multiplying the projected annual generation (kWh) by the annual  
8        discount factor.

9    **Q:    What are the results of your analysis?**

10   A:    Based on current total projected costs associated with engineering design, construction,  
11        build, interconnection and site prep, the Company estimates an LCOE of \$0.128 per kWh.  
12        This consists of a fixed charge of \$0.09 per kWh and a services and access grid fee of  
13        \$0.038 per kWh<sup>14</sup>. The Company anticipates firm final pricing next Spring once  
14        Procurement and Construction planning activities are complete.

15   **Q:    What do you conclude from the updated analysis results?**

16   A:    First, the SSP Schedule states that the solar block will not exceed \$0.1388 per kWh.  
17        Compared to this not-to-exceed energy charge, the analysis concludes that this single site  
18        project will deliver economies of scale by providing a lower fixed rate of approximately  
19        \$0.010 per kWh, which is an estimated \$5.71 per month savings per participant, or about  
20        \$68 per year<sup>15</sup> compared to the original not to exceed filed in Schedule SSP. While many  
21        variables have impacted the cost of solar over the past three years, the LCOE is determined

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<sup>14</sup> Ibid.

<sup>15</sup> Estimated savings is calculated using an average energy usage of 1,200 kWh. Schedule SSP limits participant subscription to 50% of annual usage.

1 to be lower than the original tariff not to exceed estimate. Third, the LCOE is very  
2 comparable to the average retail rate, thus the Schedule SSP program remains in line with  
3 the Company's general service rates in both Evergy Missouri Metro and Evergy Missouri  
4 West.

5 **Q: How do the results of the analysis differ if the Project for the single solar resource**  
6 **was developed as two or more separate solar arrays?**

7 A: The levelized cost assumptions would increase if the project was developed as two or more  
8 separate sites to account for the incremental site costs, project designs, environmental  
9 assessment, engineering design and construction costs.

10 **3. Project Financing**

11 **Q: How will the Company finance the Project?**

12 A: The Project will be financed through a long-term utility financing structure, which consists  
13 of approximately 50 percent debt financing and 50 percent equity financing. During  
14 construction, the site will be financed through the Company's short-term borrowing  
15 mechanism. After in-service, the financing will be changed to long-term financing and  
16 incorporated into the long-term capital structure.

17 **V. SCHEDULE SSP PROGRAM**

18 **Q: Please describe how this Project fulfills the requirements identified in Schedule SSP.**

19 A: Schedule SSP requires that the Company enroll customers in advance of construction and  
20 that the solar resource will be built when 90 percent of the proposed solar resource is  
21 committed. As of October 11, 2021, the Company reaffirmed with enrollees of the  
22 intention to subscribe and the Company confirms that it has reached over 90 percent  
23 enrolled capacity. The Company elected to move forward with the CCN request given the

1 long-awaited demand of subscribers dating back over two years and the lead time required  
2 to gain SPP approval and begin design and complete construction. The Company will  
3 continue to market the Program as it pertains to Schedule SSP to maintain the 90 percent  
4 level such that there is any “customer churn” and the Company expects to achieve 100  
5 percent enrolled capacity prior to the in-service date. The customer reaffirmation shows  
6 that both Evergy Metro Missouri and Evergy Metro West customers each exceeded 90  
7 percent of the share allocation.<sup>16</sup> Evergy Metro Missouri customers subscribed to 2,607  
8 shares (of 2,800 available shares or 93 percent) and Evergy Metro West customers  
9 subscribed to 1,647 shares (of 1,800 available shares or 91.5 percent).

10 In addition, the Company completed a thorough review of feasible Missouri sites  
11 to determine the most cost-effective location and completed an RFP to find the lowest cost  
12 for project design, procurement and construction, which is further described by Company  
13 witness Rea.

14 **Q: Please describe the enrollment process for the Schedule SSP program.**

15 A: Enrollments for the Schedule SSP program occur through an online portal on Evergy’s  
16 website. Customers are presented with an overview of the program, fact sheet, an estimated  
17 cost calculator the contact email of our Renewables team for additional support needs.  
18 Customers select a percentage of usage offset for their home or business. Customers check  
19 a box on the portal and paper application acknowledging that they agree to the terms and  
20 conditions of the program. After enrollment, a customer is directed to a confirmation web  
21 page and receives a confirmation email. Each enrollment is time stamped and dated and

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<sup>16</sup> Share allocations are set based on 10,000 available solar blocks or shares for the 5 MW portion of the Project, and divided by a number similar to the actual number of subscribers for Evergy Missouri Metro, Evergy Kansas Metro, and Evergy Missouri West jurisdiction on October 11, 2021

1 manually reviewed by the Company's Renewables team confirming each customer's  
2 eligibility. Analysis of each enrollment is conducted by the Company's Renewables team  
3 verifying eligibility of each customer, queue status of new enrollments, closed accounts  
4 and data reported by participants at enrollment. A billing process has been established to  
5 support customer charges once the Project is complete and the solar array is actively  
6 producing. Enrolled customers are flagged within the Company's billing system with each  
7 customer's enrollment, Schedule SSP share details and effective date of the customers  
8 enrollment to begin billing. Each month's generation actuals will be submitted via extract  
9 for billing.

10 **Q: How is the Company planning for and projecting future customer demand for**  
11 **Schedule SSP program until the solar facility becomes operational in 2022?**

12 A: As of October 11, 2021, the Company enrolled 1,166 customers (of which 437 customers  
13 are in Evergy Missouri Metro and 233 customers are in Evergy Missouri West). As stated  
14 above, this reflects 93 percent of the 2,800 available shares allocated to Evergy Missouri  
15 Metro and 91.5 percent of the available 1,800 shares allocated to Evergy Missouri West.  
16 The Company expects full subscription of the array and each jurisdictional allocation by  
17 early 2022. Enrollment forecasts factor in the current new enrollment acquisition rate less  
18 customer churn nets 1 percent in incremental new shares per month. Since the initial  
19 Schedule SSP program offer in 2018, the Company has taken the added step to ensure  
20 ongoing engagement of customer enrollments by issuing a proactive direct mail and email  
21 campaign allowing participants to unenroll if they no longer have interest in the program.  
22 To date the response has been minimal with less than twenty customers electing to opt out.

1 **VI. TARTAN FACTORS**

2 **Q: What standards has the Commission traditionally employed in evaluating CCN**  
3 **applications?**

4 A: It is my understanding the Commission uses what are known as the “Tartan Factors”<sup>17</sup>. The  
5 Tartan Factors are as follows:

- 6 1. Need for the Project;
- 7 2. Economic Feasibility of the Project;
- 8 3. Ability of the Applicant to Finance the Project;
- 9 4. Qualifications of the Applicant to Construct the Project; and
- 10 5. Whether the Project is in the Public Interest

11 **Q: Will you be addressing the Tartan factors?**

12 A: Yes, I will address the need for the asset, the economic feasibility of the project, Evergy’s  
13 financial ability to provide the service, Evergy’s qualifications, and the public interest.

14 **Q: Tartan factors (1) and (2) - What is the need for this asset, and how is it economically**  
15 **feasible?**

16 A: The solar generating asset for the Project is needed to serve customers under Schedule SSP  
17 and to meet the requirements of 393.1665 RSMo. The Project is economically feasible  
18 because the Project will generate electricity at a levelized cost consistent with the  
19 requirements outlined in the Schedule SSP tariff.

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<sup>17</sup> In Re Tartan Energy, GA-94-127, 3 Mo.P.S.C.3d 173, 177 (1994). While a project is not required as a matter of law to meet the “Tartan Factors,” the Commission has traditionally used the factors when evaluating CCN applications.

1 **Q: Tartan factor (3) - Does Evergy have the ability to finance the Project?**

2 A: Yes. Evergy has the ability to finance the Project because it can access the equity and debt  
3 capital necessary to do so while maintaining strong financial metrics.

4 **Q: Tartan factor (4) - Is Evergy qualified to construct the Project?**

5 A: Yes. Evergy is an electric utility with a history in Missouri of over 100 years. It owns  
6 generation of all types including solar generation. Thus, Evergy is qualified to construct  
7 the Project and operate the Project. As Company witness Rea testifies, Evergy issued an  
8 RFP and has selected a contractor from those entities that submitted proposals. The selected  
9 contractor has the experience and knowledge to construct these assets.

10 **Q: Tartan factor (5) - Please describe how the public interest will be served by a grant of**  
11 **the requested certificate.**

12 A: The Project will serve the public interest as it will provide an economically feasible  
13 renewable generation resource. The Project allows the Company to serve customers under  
14 Schedule SSP and the Project will generate solar renewable energy credits (“S-RECs”) that  
15 will ultimately benefit all customers. In addition, an affirmative finding on the first four  
16 factors generally leads to the conclusion that the public interest factor is satisfied.<sup>18</sup>

17 **Q: Please further elaborate on the value of S-RECs for a customer.**

18 A: Schedule SSP participants receive two distinct value streams through their participation in  
19 the program. The first benefit is the monthly bill offset from the solar generation of the  
20 array. Second, the customer accumulates S-RECs that are retired on behalf of the customer  
21 participant annually. S-RECs allow participants to reduce their carbon footprint,

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<sup>18</sup> Id. at. 189 (citing In re: Intercon Gas, Inc., 30 Mo. P.S.C. at 561).



1 demonstrate their sustainability commitment and have a direct, local resource that they can  
2 point to for those benefits.

3 **Q: Does this conclude your testimony?**

4 **A: Yes.**

