

**MISSOURI PUBLIC SERVICE COMMISSION**

**STAFF REPORT**

**THIRD PRUDENCE REVIEW OF CYCLE 3 COSTS AND  
FIRST PRUDENCE REVIEW OF CYCLE 4 COSTS  
RELATED TO THE  
MISSOURI ENERGY EFFICIENCY INVESTMENT ACT**

**FOR THE ELECTRIC OPERATIONS**

**OF**

**EVERGY METRO, INC.,  
d/b/a EVERGY MISSOURI METRO**

**April 1, 2023 through March 31, 2025**

**FILE NO. EO-2025-0324**

*Jefferson City, Missouri  
October 30, 2025*

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## I. Executive Summary

The Missouri Public Service Commission (“Commission”) Staff (“Staff”) reviewed and analyzed a variety of items in examining whether Evergy Metro, Inc., d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”), reasonably and prudently incurred costs associated with its demand-side programs and demand-side programs investment mechanism (“DSIM”) which were approved by the Commission’s *Amended Report and Order*<sup>1</sup> in Case No. EO-2019-0132<sup>2</sup> (“Cycle 3 Plan”) and approved by the Commission’s *Order Approving Agreement and Tariffs* in Case No. EO-2023-0369 (“Cycle 4 Plan”).

This prudence review report (“Report”) reflects Staff’s third prudence review for Evergy Missouri Metro’s Missouri Energy Efficiency Investment Act<sup>3</sup> (“MEEIA”) demand-side programs (“MEEIA Programs”) and DSIM Cycle 3 costs arising from Case No. EO-2019-0132, and first prudence review for Evergy Missouri Metro’s MEEIA programs and DSIM Cycle 4 costs arising from Case No. EO-2023-0369. This Report covers the review period of April 1, 2023 through March 31, 2025 (“Review Period”). This Report reflects prudence review costs for Evergy Missouri Metro’s Cycle 3 program costs (“Program Costs”), Cycle 4 program costs, annual energy and demand savings, Throughput Disincentive (“TD”) for Cycle 3 and Cycle 4, interest, and Earnings Opportunity (“EO”).

<sup>1</sup> On December 11, 2019, the Commission issued its *Report and Order*, and on March 11, 2020, the Commission issued its *Amended Report and Order*.

<sup>2</sup> On December 27, 2018, the Commission's *Order Granting Applications to Intervene and Order Granting Motion to Consolidate* granted consolidation of Evergy Missouri Metro's MEEIA Cycle 3 case, EO-2019-0132, with Evergy Missouri West's MEEIA Cycle 3 case, EO-2019-0133, with the lead case being EO-2019-0132.

<sup>3</sup> Section 393.1075 RSMo. Supp 2017.

Based on its review, Staff has identified disallowances of expenses for administrative program cost expenses and implementation contractors' expenses during the Review Period, identified in Table 1 below. Staff is recommending an ordered adjustment ("OA") in the amount of \$38,556.51 plus interest for Cycle 3 and \$206.32 for Cycle 4,<sup>4</sup> in Every Missouri Metro's next DSIM Rider rate adjustment filing to adjust for these disallowed expenses. The recommended OA amount is explained in detail later in this Report.

Table 1 - Cycle 3		
Costs	Explanation of Costs	Recommended Disallowance
SaaS Tracking System Annual Access Fee	Page 12	\$ 14,000.00
Administrative Program Expenses	Page 20	\$ 6,554.66
Implementation Contractors Expenses	Page 26	\$ 18,001.85
Total		\$ 38,556.51

Table 1 - Cycle 4		
Costs	Explanation of Costs	Recommended Disallowance
Administrative Program Expenses	Page 21	\$ 206.32
Total		\$ 206.32

## BACKGROUND

On November 29, 2018, Every Missouri Metro filed, in Case No. EO-2019-0132, its application under the MEEIA statute<sup>5</sup> and the Commission's MEEIA rules<sup>6</sup> for approval of Every Missouri Metro's MEEIA application. On March 11, 2020, in Case No. EO-2019-0132, the Commission authorized through its *Amended Report and Order*, Every Missouri Metro to implement its three-year "Plan" including: 1) thirteen (13) MEEIA Programs described in Every Missouri Metro's November 29, 2018 MEEIA *Cycle 3 2019-2022 Filing*; 2) a technical resource manual ("TRM"); 3) a DSIM; 4) a Research and Pilot budget; and

<sup>4</sup> Interest was not calculated on any of the Staff proposed disallowances.

<sup>5</sup> Section 393.1075 RSMo.

<sup>6</sup> 20 CSR 4240-20.093 and 20 CSR 4240-20.094.

1 5) a Pay as You Save ® (“PAYS®”) pilot program.<sup>7</sup> In its *Amended Report and Order*,  
2 the Commission also approved rates for the DSIM Rider and approved a DSIM Charge<sup>8</sup> in  
3 Case No. EO-2019-0132 to be effective on January 1, 2020.

4 The Commission’s May 12, 2022, *Order Approving Stipulation and Agreement*, approved  
5 the *Non-Unanimous Stipulation and Agreement* that was filed on April 29, 2022. In this filing,  
6 the Signatory Parties recommended the Commission approve the MEEIA Cycle 3 Plan to be  
7 extended through Calendar year 2023, or Program Year 4 (“PY4”).

8 The Commission’s November 16, 2023, *Order Approving Stipulation and Agreement*  
9 *Extending Evergy’s MEEIA Cycle 3 an Additional Year*, approved the *Unanimous Stipulation*  
10 *and Agreement* that was filed on October 30, 2023. In this filing, the Signatory Parties  
11 recommended the Commission approve the MEEIA Cycle 3 Plan to be extended through  
12 Calendar Year 2024, or Program Year 5 (“PY5”).

13 On April 29, 2024, Evergy Missouri Metro filed, in Case No. EO-2023-0369,  
14 its application under the MEEIA statute and the Commission’s MEEIA rules for approval of  
15 Evergy Missouri Metro’s MEEIA Cycle 4 application. On December 11, 2024, the Commission  
16 authorized through its *Order Approving Agreement and Tariffs*, Evergy Missouri Metro to  
17 implement its Cycle 4, two and three year plan from the Non-Unanimous Stipulation and  
18 Agreement that was filed on September 27, 2024. Details of this plan include: 1) Five program  
19 budgets: A) Income Eligible Multi-Family Program for 2 years; B) PAYS Residential Energy  
20 Efficiency Program for 2 years; C) Business Demand Response Program for 3 years;  
21 D) Residential Demand Response Program for 3 years; E) Business Energy Efficiency Program  
22 for 2 years; and F) Urban Heat Island Program for 3 years; 2) EM&V parameters; 3) Statewide  
23 MEEIA feasibility study and collaborative conditions; 4) budget caps for each program; 5) TD,  
24 6) EO; and 7) TRM and incentive ranges.

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<sup>7</sup> In its *Order Clarifying the Time in Which to File the Proposed PAYS Pilot Program*, the Commission clarified that the Company could offer the one year pilot program at a time of its choosing, sometime during the Cycle 3 Plan, and that the proposed PAYS® pilot program to be filed at least 60 days before the program would be put into effect.

<sup>8</sup> From Evergy Missouri Metro’s Original Sheet No. 49Q: Charges arising from the MEEIA Cycle 3 Plan that are the subject of this DSIM Rider shall be reflected in one “DSIM Charge” on customers’ bills in combination with any charges arising from a rider that is applicable to post-MEEIA Cycle 3 Plan demand-side management programs approved under the MEEIA. This will include any unrecovered amounts for Program Costs, TD from MEEIA Cycle 2 and any Earnings Opportunity, etc. earned/remaining from MEEIA Cycle 2 that is expected to begin recovery in early 2020.

Commission Rule 20 CSR 4240-20.093(11) requires that the Commission’s Staff conduct prudence reviews of an electric utility’s costs for its DSIM no less frequently than every twenty-four (24) months. This Report documents Staff’s third review of the prudence of Evergy Missouri Metro’s Cycle 3 Program Costs, and first review of Cycle 4 Program Costs, annual energy and demand savings, TD for Cycle 3 and Cycle 4, interest for the Review Period, and the over/under collection from the Commission approved Cycle 3 EO.

Commission Rule 20 CSR 4240-20.093(10) requires that Evergy Missouri Metro file a quarterly Surveillance Monitoring Report (“QSMR”). Confidential Attachment A to this Report is Page 6 of Evergy Missouri Metro’s Cycle 2 QSMR including the status of the MEEIA Programs and DSIM cost and savings for each of the quarter ended for the Review Period, and cumulative total ended March 31, 2025. Confidential Attachment B to this Report is Page 7 of Evergy Missouri Metro’s Cycle 3 QSMR including the status of the MEEIA Programs and DSIM cost and savings for each of the quarter ended for the Review Period, and cumulative total ended March 31, 2025. Confidential Attachment C to this Report is Page 8 of Evergy Missouri Metro’s Cycle 4 QSMR including the status of the MEEIA Programs and DSIM cost and savings for each of the quarters ended for the Review Period, and cumulative total ended March 31, 2025.

Table 2A below identifies the line items and Review Period amounts from Confidential Attachment A which are the subject of Staff’s prudence review. Table 2B below<sup>9</sup> identifies the line items and Review Period amounts from Confidential Attachment B which are the subject of Staff’s prudence review. Table 2C below identifies the line items and Review Period amounts from Confidential Attachment C which are the subject of Staff’s prudence review.

*continued on next page*

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<sup>9</sup> The difference in kWh and kW savings reported in the QSMR from Table 2B as compared to Table 6A are explained in Footnote 25.

Table 2A		
Cycle 2 Totals for April 1, 2023 through March 31, 2025		
Category	Descriptor	Period Total
Total Program Costs (\$)	Billed	\$ (32,413)
Total Program Costs (\$)	Actual	\$ 0
Total Program Costs (\$)	Variance	\$ 32,413
Total Program Costs (\$)	Interest	\$ (1,042)
Gross Energy Savings (kWh)	Target	0
Gross Energy Savings (kWh)	Deemed Actual	0
Gross Energy Savings (kWh)	Variance	0
Gross Deemed Savings (kW)	Target	0
Gross Deemed Savings (kW)	Deemed Actual	0
Gross Deemed Savings (kW)	Variance	0
Throughput Disincentive Costs (\$)	Billed	\$ 1,568,006
Throughput Disincentive Costs (\$)	Actual	\$ 0
Throughput Disincentive Costs (\$)	Variance	\$ (1,568,006)
Throughput Disincentive Costs (\$)	Interest	\$ 75,900

Table 2B		
Cycle 3 Totals for April 1, 2023 through March 31, 2025		
Category	Descriptor	Period Total
Total Program Costs (\$)	Billed	\$ 18,788,019
Total Program Costs (\$)	Actual	\$ 25,425,149
Total Program Costs (\$)	Variance	\$ 6,637,130
Total Program Costs (\$)	Interest	\$ 211,037
Gross Energy Savings (kWh)	Target	61,764,039
Gross Energy Savings (kWh)	Deemed Actual	66,031,094
Gross Energy Savings (kWh)	Variance	4,267,055
Gross Deemed Savings (kW)	Target	25,822
Gross Deemed Savings (kW)	Deemed Actual	14,839
Gross Deemed Savings (kW)	Variance	(10,983)
Throughput Disincentive Costs (\$)	Billed	\$ 7,695,092
Throughput Disincentive Costs (\$)	Actual	\$ 8,445,748
Throughput Disincentive Costs (\$)	Variance	\$ 750,656
Throughput Disincentive Costs (\$)	Interest	\$ 36,707

Table 2C		
Cycle 4 Totals for April 1, 2023 through March 31, 2025		
Category	Descriptor	Period Total
Total Program Costs (\$)	Billed	\$ 1,530,581
Total Program Costs (\$)	Actual	\$ 639,608
Total Program Costs (\$)	Variance	\$ (890,973)
Total Program Costs (\$)	Interest	\$ (1,645)
Gross Energy Savings (kWh)	Target	2,069,815
Gross Energy Savings (kWh)	Deemed Actual	0
Gross Energy Savings (kWh)	Variance	(2,069,815)
Gross Deemed Savings (kW)	Target	14,621
Gross Deemed Savings (kW)	Deemed Actual	0
Gross Deemed Savings (kW)	Variance	(14,621)
Throughput Disincentive Costs (\$)	Billed	\$ 45,460
Throughput Disincentive Costs (\$)	Actual	\$ 0
Throughput Disincentive Costs (\$)	Variance	\$ (45,460)
Throughput Disincentive Costs (\$)	Interest	\$ (167)

In evaluating prudence, Staff reviews whether a reasonable person making the same decision would find both the information the decision-maker relied on and the process the decision-maker employed to be reasonable based on the circumstances and information known at the time the decision was made, *i.e.*, without the benefit of hindsight. If either the information relied upon or the decision-making process employed was imprudent, then Staff examines whether the imprudent decision caused any harm to ratepayers. Only if an imprudent decision resulted in harm to ratepayers, will Staff propose a disallowance. However, if an imprudent decision did not result in harm to Every Missouri Metro's customers, then Staff may further evaluate the decision-making process, and may recommend changes to the company's business practice going forward.

*Staff Expert: Brooke Mastrogiannis*



## II. MEEIA Programs

Evergy Missouri Metro used various request for proposal (“RFP”) processes to contract: 1) implementers for its individual MEEIA Programs; 2) EM&V contractors for its residential and business MEEIA Programs; and 3) its comprehensive demand-side programs’ data management system Resource Innovations.

Table 3A summarizes for each of the thirteen (13) MEEIA Programs, Research & Pilot, and PAYS®: Commission-approved annual energy and demand savings targets for the Review Period, program implementers and program EM&V contractor for Cycle 3:

Table 3A				
Cycle 3 April 2023 - March 2025 Evergy Missouri Metro Energy Efficiency Plan				
MEEIA Programs	Energy Savings Targets (kWh)	Demand Savings Targets (kW)	Program Implementers	Program EM&V Contractors
Income-Eligible Multi-Family & Single Family	5,473,649	1,743	ICF	ADM
Residential Demand Response	1,212,867	10,486	CLEAResult	ADM
Business Demand Response	-	29,665	CLEAResult	ADM
Business Smart Thermostat	-	-	CLEAResult	ADM
Online Home Energy Audit	-	-	Oracle/Opower	ADM
Online Business Energy Audit	-	-	Oracle/Opower	Guidehouse
Business Custom	18,600,304	3,156	TRC	Guidehouse
Business Process Efficiency	-	-	TRC	Guidehouse
Business Standard	22,164,571	3,793	TRC	Guidehouse
Home Energy Report	-	-	Oracle/Opower	ADM
Income-Eligible Home Energy Report	-	-	Oracle/Opower	ADM
Energy Saving Products	1,041,472	159	ICF	ADM
Heating, Cooling & Home Comfort	11,471,737	6,373	ICF	ADM
Research & Pilot - Business	110,798	18	ICF	ADM
Research & Pilot - Residential	-	-	ICF	ADM
Pay As You Save (PAYS)	3,160,639	1,179	EETility	ADM
Evergy Metro Total	63,236,037	56,572		

Table 3B summarizes for each of the five (5) MEEIA Programs and PAYS: Commission-approved annual energy and demand savings targets for the Review Period, program implementers and program EM&V contractor for Cycle 4:

*continued on next page*

Table 3B				
Cycle 4 April 2023 - March 2025 Evergy Missouri Metro Energy Efficiency Plan				
MEEIA Programs	Energy Savings Targets (kWh)	Demand Savings Targets (kW)	Program Implementers	Program EM&V Contractors
Income-Eligible	752,160	91	ICF	*
HomeDemand Response	-	3,164	CLEAResult	*
Business Demand Response	-	10,911	CLEAResult	*
Urban Heat Island	-	1	Mid America Regional Counsel	*
Pay As You Save (PAYS)	423,030	194	EEtality	*
Whole Business Efficiency	894,625	259	TRC	*
Evergy Metro Total	2,069,815	14,621		
* Per the Cycle 4 Non-unanimous Stipulation and Agreement, for 2025 there will be one EM&V contractor administered by Staff. As of the date of this filing, no EM&V contract has been awarded yet.				

*Staff Expert: Brooke Mastrogiannis*

### **III. Prudence Review Process**

On June 2, 2025, Staff initiated its third prudence review of Cycle 3 costs and first prudence review of Cycle 4 costs of Evergy Missouri Metro's DSIM in compliance with 20 CSR 4240-20.093(11) as authorized under Sections 393.1075.3 and 393.1075.11, RSMo. This prudence review was performed by members of the Industry Analysis Division. Staff obtained and analyzed a variety of documents, records, reports, data request responses, work papers, and emails, and had numerous phone discussions with Evergy Missouri Metro personnel to complete its prudence review of costs for the DSIM Rider for the Review Period of April 1, 2023, through March 31, 2025. In compliance with 20 CSR 4240-20.093(11), this prudence review was completed within 150 days of its initiation.

If the Commission were to order any disallowance of costs as a result of prudence reviews and/or corrections, such a disallowance amount shall be returned to customers through an OA in a future DSIM Rider rate adjustment filing.<sup>10</sup>

*Staff Expert: Brooke Mastrogiannis*

<sup>10</sup> Evergy Missouri Metro Original Sheet No. 49T: OA = Ordered Adjustment is the amount of any adjustment to the DSIM ordered by the Commission as a result of prudence reviews and/or corrections under this DSIM Rider. Such amounts shall include monthly interest at the Company's monthly Short-Term Borrowing Rate.

**IV. Billed Revenue**

**1. Description**

For the Review Period, Evergy Missouri Metro billed customers through a separate line item on customers' bills titled "DSIM Charge" to recover estimated energy efficiency programs' costs and estimated Company TD. The "DSIM Charge" is based on the customer's monthly consumption and the applicable energy efficiency investment rates approved by the Commission most recently in Case No. ER-2025-0325.

Evergy Missouri Metro provided a random sample of actual customer bills<sup>11</sup> that Staff reviewed and determined the appropriate rates were being charged to its customer for the recovery of program and TD costs.

During the Review Period of April 1, 2023, through March 31, 2025, Evergy Missouri Metro billed customers (\$32,413) to recover its estimated energy efficiency programs' costs for MEEIA Cycle 2. For the same period, Evergy Missouri Metro actually spent \$0 on its energy efficiency programs. Thus, Evergy Missouri Metro under-collected \$32,413 from its customers during the Review Period for MEEIA Cycle 2 Program Costs. During this same Review Period, Evergy Missouri Metro billed customers \$18,788,019 to recover its estimated energy efficiency programs' costs for MEEIA Cycle 3. For the same period, Evergy Missouri Metro actually spent \$25,425,149 on its energy efficiency programs. Thus, Evergy Missouri Metro under-collected \$6,637,130 from its customers during the Review Period for MEEIA Cycle 3 Program Costs. During this same Review Period, Evergy Missouri Metro billed customers \$1,530,581 to recover its estimated energy efficiency programs' costs for MEEIA Cycle 4. For the same period, Evergy Missouri Metro actually spent \$639,608 on its energy efficiency programs. Thus, Evergy Missouri Metro over-collected \$890,973 from its customers during the Review Period for MEEIA Cycle 4 Program Costs.

During the Review Period of April 1, 2023, through March 31, 2025, for MEEIA Cycle 2, Evergy Missouri Metro billed customers \$1,568,006 for estimated Company TD. For the same period, Evergy Missouri Metro actually spent \$0 on actual Company TD. Thus, Evergy Missouri Metro over-collected \$1,568,006 from its customers during the Review Period for MEEIA Cycle 2 TD. During this same Review Period, for MEEIA Cycle 3, Evergy Missouri Metro billed

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<sup>11</sup> Evergy Missouri Metro's response to Staff's Data Request No. 0010.

1 customers \$7,695,092 for estimated Company TD. For the same period, Evergy Missouri Metro  
2 actually spent \$8,445,951<sup>12</sup> on actual Company TD. Thus, Evergy Missouri Metro  
3 under-collected \$750,859 from its customers during the Review Period for MEEIA Cycle 3 TD.  
4 During this same Review Period, Evergy Missouri Metro billed customers \$45,460 for estimated  
5 Company TD for MEEIA Cycle 4. For the same period, Evergy Missouri Metro actually spent  
6 \$0 on actual Company TD. Thus, Evergy Missouri Metro over-collected \$45,460 from its  
7 customers during the Review Period for MEEIA Cycle 4 TD.

8 The monthly amounts that are either over- or under-collected from customers are tracked  
9 in a regulatory asset account, along with monthly interest, until Evergy Missouri Metro files for  
10 rate adjustments under its DSIM Rider and new energy efficiency investment rates are approved  
11 by the Commission. The interest associated with these over- or under-collected amounts is  
12 provided in Section IX of this Report.

## 13 2. Conclusion

14 Staff found no indication that Evergy Missouri Metro has acted imprudently regarding  
15 the determination of the “DSIM Charge” for customers’ bills except as discussed below in  
16 Section VI Actual Program Costs.

## 17 3. Documents Reviewed

- 18 a. Evergy Missouri Metro’s MEEIA Cycle 2, Cycle 3, and Cycle 4 Plan;
- 19 b. Approved MEEIA Energy Efficiency and Demand Side Management
- 20 Programs Tariff Sheets;
- 21 c. Evergy Missouri West’s work papers included in Case Nos.
- 22 ER-2023-0410, ER-2024-0184, ER-2024-0351, ER-2025-0173, and
- 23 ER-2025-0325;
- 24 d. Evergy Missouri Metro’s Quarterly Surveillance Monitoring Reports,
- 25 Page 6 and 7; and
- 26 e. Staff Data Requests: 0003, 0005, 0010, and 0019.

27 *Staff Experts: Brooke Mastrogiannis and Teresa Denney*

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<sup>12</sup> Quarter 1 of 2025 QSMR notes: Energy savings, demand savings, and throughput disincentive costs results were retroactively updated for the quarter ended December 31, 2024 in the March 31, 2025 Surveillance Report due to a duplicated project error regarding reported thermostat installations identified in March 2025. Therefore, this total is \$202 different from the QSMR totals.

**V. Resource Innovations Tracking Software**

**1. Description**

In January 2016, Evergy Missouri Metro contracted an integrated software tracking system called Nexant to allow Evergy Missouri Metro to store, manage, and process data for its DSM portfolio over the life-cycle of each measure in Evergy Missouri Metro's Cycle 2 and Cycle 3 Plan. Nexant specifically allowed Evergy Missouri Metro to develop operating rules for its approved energy efficiency programs, process customers' applications, support processing and payment of incentives (rebates)<sup>13</sup> and provide regulatory compliance and management reporting. Before Evergy Missouri Metro contracted with Nexant in Cycle 2, it considered four vendors, and Nexant was selected based on the best overall score for the criteria of meeting core requirements, company experience and performance, growth opportunity, pricing, diversity participation, and Evergy Missouri Metro Information Technology involvement needed. Evergy Missouri Metro extended their contract with Nexant for Cycle 3 MEEIA programs and the contract added support and implementation work called the "Nexant Care Package". Nexant was acquired by Resource Innovations in May 2021. The Nexant system is the same platform that is used during this review period called iEnergy (now owned by Resource Innovations).

The primary implementers that are able to use this tracking system are CLEAResult, TRC, Uplight, ICF, and ADM. CLEAResult and Uplight uses it for all of the Demand Response and thermostat programs, ICF uses it for all Residential Programs, and TRC uses it for all Business Programs. For the low volume programs the incentive amounts and energy and demand savings amounts are manually put into the Resource Innovations system.

Evergy Missouri Metro provides rebates and incentive payments based upon the type and nature of measures installed by customers to promote the adoption of energy efficiency measures. Staff reviewed the controls Evergy Missouri Metro has developed to assure demand-side program incentive payments are accounted for properly. Staff also reviewed the incentive amounts paid to customers to verify they complied with incentive levels for individual measures

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<sup>13</sup> Evergy Missouri Metro 2nd Revised Sheet No. 49R: "Incentive" means any consideration provided by the Company, including buy downs, markdowns, rebates, bill credits, payments to third parties, direct installation, giveaways, and education, which encourages the adoption of program measures.

1 approved for each energy efficiency program. Data management and recordkeeping is critical for  
2 the proper administration of the DSIM Rider.

3       Evergy Missouri Metro granted Staff remote on-line access to the Nexant system for  
4 Staff's use in conducting Staff's MEEIA prudence review. Staff reviewed a sample of customer  
5 data, incentive levels, and annual energy and demand savings for all of Evergy Missouri Metro's  
6 approved energy efficiency programs. During its review, Staff found that while some program  
7 reporting in Resource Innovations did match to the incentives reported in Table 4 below, which  
8 is created from the general ledger, other programs did not match to total incentives reported in  
9 Table 4. Staff had to rely on Evergy Missouri Metro's general ledger to accurately review the  
10 total incentives reported in program costs, instead of the data exported from the Resource  
11 Innovations system. Evergy Missouri Metro also provided, in Staff Data Request Nos. 0016 and  
12 0016S, a reconciliation of incentives paid to residential and commercial customers for the  
13 Review Period. This reconciliation provided Staff with additional details for the differences  
14 between the general ledger and Resource Innovations. Some reconciliation differences include:  
15 1) rebates were inadvertently accrued twice and reversed later; 2) rebates were not accrued in the  
16 month it was entered into the general ledger and recognized at a later date; 3) minor differences  
17 in timing of invoices; 4) bill credits processed as Business Custom but reported in other locations  
18 as Business Standard; and 5) project processed invoice under ineligible rate case but iEnergy  
19 reported under eligible rate code, etc. After reviewing the reconciliations provided in responses  
20 to Staff Data Request Nos. 0016 and 0016S, Staff was able to verify all but a very insignificant  
21 amount of incentives with the general ledger.

22       Staff has had concerns regarding the reconciliations provided to Staff with additional  
23 details for the differences between the general ledger and Resource Innovations, now and in the  
24 past. Staff also has concerns that these incentive differences between those two sources could  
25 also have an impact on the kWh reported and used towards the TD calculation as well. Evergy  
26 responded to Staff Data Request No. 0016.7 and stated: "Evergy has instituted some additional  
27 safeguards to help avoid this situation in the future by having implementers always report  
28 incentives at the specific measure level, a reconciliation between invoices and iEnergy and a  
29 general ledger and iEnergy review once all projects uploaded." Staff would like to further  
30 reiterate and make a recommendation that Evergy Missouri Metro continue to enforce these

1 additional safeguards and also keep a reconciliation between the iEnergy reports and the  
2 Resource Innovations tracking system on a quarterly basis.

3 In addition, after reviewing the cost of the iEnergy tracking system, and Evergy Missouri  
4 Metro's response to Staff Data Request No. 0016.11,<sup>14</sup> Evergy has stated, "Yes, the assumption  
5 of 10% Electrification was applied in the context of application use and budget planning. These  
6 costs associated with the SaaS tracking system or care packages were removed from MEEIA and  
7 reallocated to another recovery mechanism for Electrification." However, as Staff reviewed the  
8 removal of 10% for the tracking system, Staff realized that only 10% was removed for the care  
9 packages, but 10% was not removed for the tracking system annual access fee. Staff is of the  
10 opinion that Electrification is not specific to MEEIA, and should not be included for recovery.  
11 Therefore, Staff is recommending a disallowance of \$14,000, plus interest, for the iEnergy SaaS  
12 tracking system annual access fee.

## 13 2. Conclusion

14 Staff has identified expenses that the Company included costs for their Resource  
15 Innovations tracking system annual access fee, for which 10% should have been allocated  
16 towards Electrification. Therefore, Staff is recommending the Commission order an OA in the  
17 amount of \$14,000, plus interest, for Cycle 3 to be applied to Evergy Missouri Metro's next  
18 DSIM filing. In addition, Staff recommends going forward that Evergy Missouri Metro continues  
19 to enforce additional safeguards by having implementers always report incentives at the specific  
20 measure level, and also keeps a reconciliation between the iEnergy reports from the Resource  
21 Innovations tracking system and the general ledger on a quarterly basis.

## 22 3. Documents Reviewed

- 23 a. Evergy Missouri Metro's Cycle 3 Plan;
- 24 b. Approved MEEIA Energy Efficiency and Demand Side Management  
25 Programs Tariff Sheets;
- 26 c. Staff Data Requests: 0003, 0008, 0016, 0016S, 0016.1, 0016.2, 0016.3,  
27 0016.4, 0016.5, 0016.6, 0016.7, 0016.8, 0016.9, 0016.10, 0016.11,  
28 0016.12, 0020, and 0023; and
- 29 d. Evergy Missouri Metro MEEIA Vendor and Implementer Contracts.

30 *Staff Expert: Brooke Mastrogiannis*

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<sup>14</sup> Staff Data Request No. 0016.11 in EO-2025-0324.

**VI. Actual Program Costs**

Evergy Missouri Metro's programs' costs include: 1) incentive payments; 2) program administration costs for residential and business programs; and 3) strategic initiative program costs for general, accounting, regulatory, administrative, implementation, and marketing costs.

Staff reviewed all actual program costs Evergy Missouri Metro sought to recover through its "DSIM Charge" to ensure only reasonable and prudently incurred costs are being recovered through the DSIM Rider. Staff reviewed and analyzed, for prudence, Evergy Missouri Metro's adherence to contractual obligations, adequacy of controls and compliance with approved tariff sheets. Evergy Missouri Metro provided Staff accounting records for all programs' costs it incurred during the Review Period. Staff categorized these costs by program and segregated them between incentive payments and program administrative costs.

During this Review Period, there were Cycle 3 and Cycle 4 program costs. The results of Staff's categorization of Cycle 3 programs' costs are provided in Table 4A as a total for the Current Review Period, Table 4B as a total for the Cycle 3 Cumulative program costs, and Table 4C for Cycle 4 Current Review Period shown below:

*continued on next page*



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<b>Table 4A</b> <b>Cycle 3-CURRENT REVIEW PERIOD</b> <b>Actual Rebate and Program Cost Totals</b> <b>Program Costs April 1, 2023 through March 31, 2025</b>			
	<b>TOTAL COSTS</b>	<b>REBATES</b>	<b>PROGRAM ADMINISTRATION</b>
<b>RESIDENTIAL:</b>			
Research & Pilot-Residential	\$ 165,751	\$ 25,515	\$ 140,236
Income Eligible Mult-Family	\$ 2,526,637	\$ 1,550,559	\$ 976,078
Income Eligible Single Family	\$ 1,161,452	\$ 854,740	\$ 306,713
2024 MEEIA - Urban Heat Island Res	\$ 306,708	\$ 162,217	\$ 144,491
Residential Demand Response	\$ 4,030,823	\$2,256,478.49	\$ 1,774,345
Online Home Energy Audit	\$ 4,246	\$0.00	\$ 4,246
Pay As You Save (PAYS)	\$ 982,638	\$ 322,558	\$ 660,080
Energy Saving Products	\$ 366,858	\$ 111,811	\$ 255,046
Heating, Cooling & Home Comfort	\$ 4,064,412	\$ 2,738,917	\$ 1,325,495
<b>Subtotal Residential Programs</b>	<b>\$ 13,609,525</b>	<b>\$ 8,022,795</b>	<b>\$ 5,586,730</b>
<b>BUSINESS:</b>			
Research & Pilot-Business	\$ 45,530	\$ 3,148	\$ 42,382
R&P Saving Trees	\$ 38,269	\$ -	\$ 38,269
2024 MEEIA - Urban Heat Island Bus	\$ 14,241	\$ -	\$ 14,241
Business Demand Response	\$ 3,198,861	\$ 1,641,038	\$ 1,557,823
Business Smart Thermostat	\$ 2,485	\$ 2,144	\$ 341
Online Business Energy Audit	\$ 483	\$ -	\$ 483
Business Custom	\$ 4,147,930	\$ 3,086,511	\$ 1,061,418
Business Process Efficiency	\$ 7,552	\$ -	\$ 7,552
Business Standard	\$ 4,360,684	\$ 2,969,989	\$ 1,390,695
<b>Subtotal Business Programs</b>	<b>\$ 11,816,034</b>	<b>\$ 7,702,831</b>	<b>\$ 4,113,203</b>
<b>Strategic Initiative Proj</b>	<b>\$ (410)</b>	<b>\$ -</b>	<b>\$ (410)</b>
<b>Grand Total--All Programs</b>	<b>\$ 25,425,149</b>	<b>\$ 15,725,626</b>	<b>\$ 9,699,524</b>
<b>COSTS BY SUBACCOUNTS:</b>			
Incentives	\$ 15,725,626		
Program Delivery	\$ 5,458,554		
Evaluation	\$ 708,722		
Marketing	\$ 906,403		
Administrative	\$ 2,625,844		
<b>Total Program Costs (Subaccounts)</b>	<b>\$ 25,425,149</b>		

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<b>Table 4B</b>			
<b>Cycle 3-CUMULATIVE</b>			
<b>Actual Rebate and Program Cost Totals</b>			
<b>Program Costs April 1, 2021 through March 31, 2025</b>			
	<b>TOTAL COSTS</b>	<b>REBATES</b>	<b>PROGRAM ADMINISTRATION</b>
<b>RESIDENTIAL:</b>			
Research & Pilot-Residential	\$ 687,934	\$ 149,790	\$ 538,144
Income Eligible Mult-Family	\$ 4,905,078	\$ 2,000,874	\$ 2,904,204
Income Eligible Single Family	\$ 1,218,813	\$ 856,106	\$ 362,707
2024 MEEIA - URBAN HEAT ISLAND RES	\$ 306,708	\$ 162,217	\$ 144,491
Residential Demand Response	\$ 10,494,622	\$ 3,352,610	\$ 7,142,011
Online Home Energy Audit	\$ 417,726	\$0.00	\$ 417,726
Pay As You Save (PAYS)	\$ 2,126,352	\$ 591,288	\$ 1,535,065
Home Energy Report	\$ 1,308,813	\$ -	\$ 1,308,813
Home Energy Report Income Eligible	\$ 392,380	\$ -	\$ 392,380
Energy Saving Products	\$ 5,204,351	\$ 2,749,353	\$ 2,454,999
Heating, Cooling & Home Comfort	\$ 8,216,926	\$ 5,041,289	\$ 3,175,637
<b>Subtotal Residential Programs</b>	<b>\$ 35,279,703</b>	<b>\$ 14,903,526</b>	<b>\$ 20,376,177</b>
<b>BUSINESS:</b>			
Research & Pilot-Business	\$ 368,522	\$ 150,640	\$ 217,883
R&P Saving Trees	\$ 78,586	\$ -	\$ 78,586
2024 MEEIA - URBAN HEAT ISLAND BUS	\$ 14,241	\$ -	\$ 14,241
Business Demand Response	\$ 7,173,086	\$ 3,430,151	\$ 3,742,936
Business Smart Thermostat	\$ 170,297	\$ 10,169	\$ 160,128
Online Business Energy Audit	\$ 62,930	\$ -	\$ 62,930
Business Custom	\$ 11,102,833	\$ 6,535,282	\$ 4,567,551
Business Process Efficiency	\$ 483,049	\$ 2,005	\$ 481,044
Business Standard	\$ 13,650,656	\$ 7,718,197	\$ 5,932,459
<b>Subtotal Business Programs</b>	<b>\$ 33,104,199</b>	<b>\$ 17,846,443</b>	<b>\$ 15,257,755</b>
<b>Grand Total--All Programs</b>	<b>\$ 68,383,902</b>	<b>\$ 32,749,969</b>	<b>\$ 35,633,932</b>
<b>COSTS BY SUBACCOUNTS:</b>			
Customer Rebates	\$ 32,749,969		
Program Delivery	\$ 23,307,711		
Evaluation	\$ 1,861,640		
Marketing	\$ 3,452,901		
Administrative	\$ 7,011,270		
<b>Total Program Costs (Subaccounts)</b>	<b>\$ 68,383,492</b>		

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<b>Table 4C</b> <b>Cycle 4</b> <b>Actual Rebate and Program Cost Totals</b> <b>Program Costs January 1, 2025 through March 31, 2025</b>			
	<b>TOTAL COSTS</b>	<b>REBATES</b>	<b>PROGRAM ADMINISTRATIO</b>
<b>RESIDENTIAL:</b>			
IncElgbl MultiFam-EMM4	\$ 79,100	\$ 41,571	\$ 37,529
Urban Heat Island-EMM4	\$ 25,961	\$ -	\$ 25,961
Home Demand Response-EMM4	\$ 120,856	\$ 47,953	\$ 72,903
PAYS-EMM4	\$ 82,030	\$ -	\$ 82,030
<b>Subtotal Residential Programs</b>	<b>\$ 307,948</b>	<b>\$ 89,524</b>	<b>\$ 218,423</b>
Bus Demand Reponse-EMM4	\$ 114,259	\$ -	\$ 114,259
Fast Track-EMM4	\$ 42,250	\$ -	\$ 42,250
Whole Business Efficiency-EMM4	\$ 100,071	\$ 1,252	\$ 98,819
<b>Subtotal Business Programs</b>	<b>\$ 256,580</b>	<b>\$ 1,252</b>	<b>\$ 255,328</b>
Strategic Initiative Proj	\$ 75,080	\$ -	\$ 75,080
<b>Total Program Costs</b>	<b>\$ 639,608</b>	<b>\$ 90,777</b>	<b>\$ 548,831</b>
<b>COSTS BY SUBACCOUNTS:</b>			
Incentives	\$ 90,777		
Implementation Contractors	\$ 215,513		
Evaluation	\$ -		
Marketing	\$ 29,024		
Administrative	\$ 304,295		
<b>Total Program Costs</b>	<b>\$ 639,608</b>		

Evergy Missouri Metro incurs administrative costs that are directly related to the implementation of its approved energy efficiency programs. Staff uses the term “administrative” to mean all costs other than incentives.<sup>15</sup> Staff reviewed each administrative category of cost to determine the reasonableness of each individual item of cost and if the costs being sought for recovery were directly related to energy efficiency programs and recoverable from customers through the “DSIM Charge.”

Evergy Missouri Metro has also developed internal controls that allow for review and approval at various stages for the accounting of costs for its energy efficiency programs. Evergy Missouri Metro has developed internal procedures that provide program managers and

<sup>15</sup> Incentives are program costs for direct and indirect incentive payments to encourage customer and/or retail partner participation in programs and the costs of measures that are provided at no cost as part of a program.

1 other reviewers a detailed and approved method for reviewing invoices. Evergy Missouri Metro  
2 also provided Staff with its policies related to reimbursement of employee-incurred business  
3 expenses and approval authority for business transactions.

4 For this current review period, the incentive cost to program administrative cost ratio for  
5 Evergy Missouri Metro did improve as compared to the last prudence review. For Cycle 3 costs  
6 alone in this review period, 61.9% of total costs were for incentives and 38.1% of total costs were  
7 for program administrative costs. For Cycle 4 costs alone in this review period, 16% of total  
8 costs were for incentives and 84% of total costs were for program administrative costs.<sup>16</sup>

9 **A. Administrative Costs**

10 **1. Description**

11 During this MEEIA prudence review, Staff evaluated all administrative expenses incurred  
12 and identified Cycle 3 expenses that were not specifically MEEIA related under this category or  
13 there was missing information to determine eligibility. Staff requested the Company provide  
14 invoices related to implementation contractors; conferences and meetings along with the agendas  
15 or related information; travel expenses including airfare, meals, transportation; memberships,  
16 sponsorships and association fees; and, miscellaneous other administrative program costs.

17 The Commission's *Order Approving Unanimous Partial Stipulation and Agreement*  
18 issued on February 17, 2021, in Case No. EO-2020-0227,<sup>17</sup> established that "Evergy shall only  
19 seek recovery of costs associated with conferences and memberships through DSIM rates if those  
20 costs would not be incurred but for the Company's offering of MEEIA programs. Evergy shall  
21 provide Staff justification to support its claim that these costs would not be incurred but for the  
22 Company's offering of MEEIA programs."

23 The Commission's *Order Approving Unanimous Stipulation and Agreement* issued on  
24 June 26, 2024, in Case No. EO-2023-0407,<sup>18</sup> established on page 5, items 3 and 4, further  
25 provisions as follows:

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<sup>16</sup> The percentages for Cycle 4 will not be an accurate representation due to the fact that Cycle 4's review period is very limited at the time of this prudence review.

<sup>17</sup> Evergy Missouri West's MEEIA prudence review, Case No. EO-2020-0228 was consolidated to Case No. EO-2020-0227, Evergy Missouri Metro's previous MEEIA prudence review.

<sup>18</sup> Unanimous Stipulation and Agreement page 5 of Case No. EO-2023-0407.

3. From the effective date of a Commission approved stipulation, the Company shall not seek recovery through its DSIM Rider for:

- Any gifts or awards, which includes events to give out these items, to its employees or contractors/implementers;
- Shirts, promotional items, and other Evergy logo items that are not specific to MEEIA demand-side management programs;
- Events that have alcohol provided at them;
- Sponsorships to an organization when a membership has already been purchased; and

4. The Company shall provide detailed invoices for its contractors/implementers, including but not limited to travel charges.

This Stipulation and Agreement was determined to help eliminate the amount of disallowances for charges made in each prudence review for both Administrative Costs and Implementation Contractors.

Staff reviewed all of the information and receipts provided in this case. Evergy Missouri Metro provided some explanation and justification on questionable expenses during the review and many of those were justified. However, there still were some expenses that Staff views as not justified enough to support its claim that these costs would not be incurred but for the Company's offering of the MEEIA programs. For example, providing food, snacks and beverages for local team meetings are not prudent MEEIA charges. Also, many charges were missing receipts. Therefore, Staff recommends these administrative expenses should not be recoverable through the Evergy Missouri Metro DSIM Rider and recommends the Commission order an OA in the next DSIM filing.

Additional details on the reason for disallowance on specific administrative program costs are identified in Table 5A Cycle 3 and Table 5B Cycle 4 below:

*continued on next page*

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Table 5A		
Reason for Disallowance	Costs	Disallowed Cost
No receipts	Conference & Meetings	\$ 2,454.55
Local team meetings should not have meals, snacks, or coffee charged to MEEIA	Conference & Meetings	\$ 2,521.47
Posted amount in G/L was \$621.83. Only valid invoice received for this reservation was in the amount of \$481.74, so removing \$140.09 to match.	Conference & Meetings	\$ 140.09
Posted to G/L as a shuttle service. The invoice state it is for Limousine, which is not a prudent charge to MEEIA	Conference & Meetings	\$ 128.25
Posted to G/L as a shuttle service. The invoice state it is for Limousine, which is not a prudent charge to MEEIA	Conference & Meetings	\$ 123.25
Removed \$32.27 because amount on Mileage Receipt is \$50.00 not the \$82.27 posted to the G/L	Conference & Meetings	\$ 32.27
The invoice does not show Agent Fee on it.	Conference & Meetings	\$ 15.00
Removed because adequate documentation was not received	Conference & Meetings	\$ 124.66
Posted to G/L as a shuttle service. The invoice state it is for Limousine, which is not a prudent charge to MEEIA	Conference & Meetings	\$ 284.35
Posted to G/L as a shuttle service. The invoice state it is for Limousine, which is not a prudent charge to MEEIA	Conference & Meetings	\$ 297.97
Per Company Response to Data Request 13.1, this charge should be removed, but no data showing this, removed charge	Business Cards	\$ 96.73
Per Stip, no sponsorships when there is already a membership to organization	Electric League Forum Sponsorship	\$ 255.00
This is travel to Kansas for promotion. This charge should be charged to Kansas KEELIA not MO ratepayers	Travel to and from CSM All Hands Meeting in Emporia KS to promote Business Demand Response Program	\$ 81.07
<b>TOTAL</b>		<b>\$ 6,554.66</b>

2



Table 5B		
Reason for Disallowance	Costs	Disallowed Cost
Local team meetings should not have meals, snacks, or coffee charged to MEFA	Conference & Meetings	\$ 40.07
NO DETAILED RECEIPT, CAN'T VERIFY IF PRUDENT	Conference & Meetings	\$ 166.25
TOTAL		\$ 206.32

Another concern Staff identified in this prudence review is that there is a lack of accessibility for auditing Evergy Missouri Metro's excel sheet provided in response to Staff Data Request No. 0013 ("DR13") and its general ledger provided in its response to Staff Data Request No. 0003. In the spreadsheet provided in response to Staff DR13, every entry for each invoice was the total amount of the invoice whether said invoice was split between Evergy Missouri Metro and Evergy Missouri West, and/or split between projects. This made for a very difficult reconciliation between the DR13 excel sheet, the general ledger, and the invoice provided by the company. Staff recommends that in the future, if another data request response entails general ledger entries, that they should correspond to the original response with the general ledger detail. Staff discussed this issue with Evergy Missouri Metro and determined that the issue will likely be of less concern going forward. Staff will address this issue in a future prudence review as necessary.

## **2. Conclusion**

Staff identified expenses that the Company did not provide any justification for the costs and for meetings that were local and did not require the Company to spend ratepayer funds for meals, snacks or beverages in order to conduct these meetings, items that did not have receipts, and other miscellaneous items. Therefore, Staff is recommending the Commission order an OA in the amount of \$6,554.66 for Cycle 3 and \$206.32 for Cycle 4, plus interest, to be applied to Evergy Missouri Metro's next DSIM filing.

## **3. Documents Reviewed**

- a. Staff Data Requests: 0002, 0003, 0006, 0012, 0013, 0013.1, 0015, 0016, 0026, and 0026.1.

*Staff Expert: Amanda C. Conner*

**B. Implementation Contractors**

**1. Description**

Evergy Missouri Metro hired business partners for design, implementation, and delivery of its portfolio of residential and business energy efficiency programs to customers. Contracting with competent, experienced, and reliable program implementers is extremely important to the success of Evergy Missouri Metro's energy efficiency programs and for affording Evergy Missouri Metro's customers the greatest benefits.

Evergy Missouri Metro issued RFPs at the beginning of Cycle 3 for program implementers to directly administer one or more of Evergy Missouri Metro's energy efficiency programs. Evergy Missouri Metro selected and contracted with the organizations identified in Table 3 to implement individual MEEIA Programs. All of the implementers identified in Table 3 are nationally recognized contractors that have solid histories of energy efficiency programs' design and implementation.

Staff reviewed Evergy Missouri Metro's relationship with its implementers to gauge if Evergy Missouri Metro acted prudently in the selection and oversight of its program implementers. Staff examined the contracts between Evergy Missouri Metro and the implementers in an effort to determine if the terms of the contract were followed during the implementation of the residential and business programs. Staff also reviewed a large sample of over 600 invoices paid to the implementers identified in Table 3, and traced these costs to the general ledger, program costs in Evergy Missouri Metro's response to Staff Data Request No. 0003.

Comparing actual cumulative deemed annual energy and demand savings relative to the planned cumulative annual energy and demand savings for the same period is important to understanding the overall performance of Evergy Missouri Metro's energy efficiency programs and its implementation contractors.

Tables 6A and 6B below provide a comparison of achieved energy and demand savings and planned deemed energy and demand savings for Evergy Missouri Metro's residential and business programs for the Review Period for both Cycle 3 and Cycle 4. If Evergy Missouri Metro was unable to achieve its planned energy and demand savings levels, that could be an indication the programs were not being prudently administered by the implementers and by Evergy Missouri Metro. Although some of Evergy Missouri Metro's individual programs did not



meet energy and demand savings targets, the programs in total achieved and exceeded the overall energy efficiency portfolio annual energy and demand savings targets. Staff will continue to monitor the achieved energy and demand savings throughout the course of Cycle 3 and Cycle 4.

**Table 6A**

Cycle 3 April 1, 2023 through March 31, 2025						
	Achieved Energy Savings (kWh)	Planned Energy Savings (kWh)	Variance	Achieved Demand Savings (kW)	Planned Demand Savings (kW)	Variance
<b>MEEIA Programs</b>						
Income-Eligible Multi-Family & Single-Family	7,866,037	5,473,649	2,392,388	987	1,743	(756)
Residential Demand Response	734,080	1,212,867	(478,787)	6,884	10,486	(3,603)
Business Demand Response	-	-	-	33,237	29,665	3,572
Business Smart Thermostat	-	-	-	-	-	-
Online Home Energy Audit	-	-	-	-	-	-
Online Business Energy Audit	-	-	-	-	-	-
Business Custom	24,127,905	18,600,304	5,527,602	4,696	3,156	1,539
Business Process Efficiency	-	-	-	-	-	-
Business Standard	22,539,599	22,164,571	375,028	4,904	3,793	1,111
Home Energy Report	-	-	-	-	-	-
Income-Eligible Home Energy Report	-	-	-	-	-	-
Energy Saving Products	2,895,928	1,041,472	1,854,457	211	159	53
Heating, Cooling & Home Comfort	7,361,442	11,471,737	(4,110,295)	4,361	6,373	(2,012)
Research & Pilot	119,302	110,798	8,504	27	18	10
Urban Heat Island	-	-	-	-	-	-
Pay As You Save (PAYS)	299,511	3,160,639	(2,861,128)	95	1,179	(1,084)
Evergy Metro Total	65,943,805	63,236,037	2,707,768	55,402	56,572	(1,170)

**Table 6B**

Cycle 4 April 1, 2023 through March 31, 2025						
	Achieved Energy Savings (kWh)	Planned Energy Savings (kWh)	Variance	Achieved Demand Savings (kW)	Planned Demand Savings (kW)	Variance
<b>MEEIA Programs</b>						
Income-Eligible	-	752,160	(752,160)	-	91	(91)
Home Demand Response	-	-	-	-	3,164	(3,164)
Business Demand Response	-	-	-	-	10,911	(10,911)
Urban Heat Island	-	-	-	-	1	(1)
Modified Pay As You Save (PAYS)	-	423,030	(423,030)	-	194	(194)
Whole Business Efficiency	-	894,625	(894,625)	-	259	(259)
Evergy Metro Total	-	2,069,815	(2,069,815)	-	14,621	(14,621)

During this MEEIA prudence review, Staff evaluated all expenses incurred under the Implementation Contractor's invoices and whether they were specific to MEEIA. Staff recommends adjustments be disallowed because of the *Stipulation and Agreement* mentioned above, specific to "the Company shall provide detailed invoices for its contractors/implementers, including but not limited to travel charges." These adjustments were for the implementer ICF Resources, LLC ("ICF") invoices. The Marketing portion of these invoices had both charges for Labor and Other Direct Charges ("ODC"). When asked in Staff Data Request No. 0025.2 what ODC was and if there should be invoices, the Company answered, "ICF's marketing costs are categorized as labor and other direct costs. Other direct costs include non-labor materials directly related to program marketing. These are purchased by ICF and reimbursed by Evergy within the contracted budget."<sup>19</sup> Evergy Missouri Metro gave a vague answer and provided no additional invoices, therefore, Staff has recommended a disallowance for all of the ODC charges from ICF. Additional details about the expenses Staff recommends be disallowed are identified in Table 7 below:

*continued on next page*

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<sup>19</sup> Q0025.2\_Q0025.1\_DR25.1 more infor attachment- response- Excel.

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Table 7				
JE/Inv/Voucher #	IC/Vendor	GL Month(s)	Reason for Disallowance	Disallowed Cost
S0485567	ICF	Jul-23	Did not receive invoices for the **ODC, per Stip in last Review, this is requirement	\$ 314.83
S0495315	ICF	Aug-23	Did not receive invoices for the **ODC, per Stip in last Review, this is requirement	\$ 215.07
S0508818	ICF	Sep-23	Did not receive invoices for the **ODC, per Stip in last Review, this is requirement	\$ 2,554.75
S0522759	ICF	Nov-23	Did not receive invoices for the **ODC, per Stip in last Review, this is requirement	\$ 2,132.82
S0534430	ICF	Dec-23	Did not receive invoices for the **ODC, per Stip in last Review, this is requirement	\$ 439.53
S0543992	ICF	Jan-24	Did not receive invoices for the **ODC, per Stip in last Review, this is requirement	\$ 296.01
S0562200	ICF	Feb-24	Did not receive invoices for the **ODC, per Stip in last Review, this is requirement	\$ 5,233.55
S0588159	ICF	May-24	Did not receive invoices for the **ODC, per Stip in last Review, this is requirement	\$ 13.78
S0594322	ICF	May-24	Did not receive invoices for the **ODC, per Stip in last Review, this is requirement	\$ 24.42
S0607880	ICF	Jul-24	Did not receive invoices for the **ODC, per Stip in last Review, this is requirement	\$ 1,049.45
S0616078	ICF	Aug-24	Did not receive invoices for the **ODC, per Stip in last Review, this is requirement	\$ 744.77
S0629867	ICF	Sep-24	Did not receive invoices for the **ODC, per Stip in last Review, this is requirement	\$ 3,004.00
S0638661	ICF	Oct-24	Did not receive invoices for the **ODC, per Stip in last Review, this is requirement	\$ 1,050.17
S0650954	ICF	Nov-24	Did not receive invoices for the **ODC, per Stip in last Review, this is requirement	\$ 613.90
S0662059	ICF	Dec-24	Did not receive invoices for the **ODC, per Stip in last Review, this is requirement	\$ 125.88
S0662042	ICF	Dec-24	Did not receive invoices for the **ODC, per Stip in last Review, this is requirement	\$ 188.92
Total				\$ 18,001.85

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Another concerning factor in Evergy Missouri Metro's Implementation Contractor's general ledger entries is the lack of transparency with regards to the invoices provided by

these companies and how Evergy Missouri Metro inputs the invoices into its general ledger. Instead of using the invoice or receipt numbers on the actual invoices provided in Staff Data Request No. 0025, the company created five- to eight-digit voucher numbers for some of these invoices and then split them between projects and in some cases work ID description. This poses a problem when auditing, because some invoices were not given a voucher number, so there was no way to reference certain invoices provided. This made it extremely difficult to review an invoice and verify this invoice in the general ledger provided. Therefore, Staff recommends, going forward, that Evergy Missouri Metro includes the invoice or receipt number that is provided on the invoice, within each general ledger transaction, so it is easier to reference every invoice.

## **2. Conclusion**

Staff found that Evergy Missouri Metro has acted imprudently by not providing the additional invoices for the other direct charges of some of the implementer contractor's expenses, therefore Staff was not able to verify if the expenses were prudent. Staff recommends the Commission order an OA in the amount of \$18,001.85, plus interest, to be applied to Evergy Missouri Metro's next DSIM filing. In addition, Staff recommends going forward that Evergy Missouri Metro include the invoice or receipt number that is provided on the invoice, within each general ledger transaction.

## **3. Documents Reviewed**

- a. Evergy Missouri Metro's Cycle 3 Plan, along with Standard 11-Step Change Process Notification in PY4 Case No. EO-2019-0132;
- b. Approved MEEIA Energy Efficiency and Demand Side Management Programs Tariff Sheets; and
- c. Staff Data Requests: 0002, 0002.1, 0003, 0003.1, 0003.2, 0003.3, 0007, 0007.1, 0012, 0012.1, 0013, 0014, 0014.1, 0016, 0019, 0019.1, 0025, 0025.2, and 0026.

*Staff Experts: Amanda C. Conner and Brooke Mastrogiannis*

**C. EM&V Contractors**

**1. Description**

Evergy Missouri Metro is required to hire independent contractors(s) to perform and report EM&V of each Commission-approved demand-side program. Commission rules allow Evergy Missouri Metro to spend up to 5% of its total program costs budget for EM&V.<sup>20</sup> On November 16, 2023, the Commission issued its *Order Approving Stipulation and Agreement*, which approved the *Non-Unanimous Stipulation and Agreement* that was filed on October 30, 2023. In this filing, the Signatory Parties recommended the Commission approve the MEEIA Cycle 3 Plan to be extended through Calendar year 2024, or Program Year 5 (“PY5”). Also in this filing, the parties agreed that PY5 EM&V budgets will be set at 3.0% of the total budget. Guidehouse Inc. (“Guidehouse”) and ADM Associates, Inc. (“ADM”) conducted and reported the EM&V results for Evergy Missouri Metro’s Cycle 3 programs.<sup>21</sup>

During the Review Period, Evergy Missouri Metro expended \$752,439 for Cycle 3 EM&V. This amount, combined with the \$1,057,097 EM&V Cycle 3 cumulative costs reported previously, amounts to \$1,809,306, or 2.65% of the \$68,396,445 total programs’ costs budget for Cycle 3. Thus, the costs associated with the EM&V did not exceed the 3% maximum cap for Cycle 3. Staff will continue to monitor EM&V costs throughout the life of Cycle 3, to ensure Evergy Missouri Metro does not exceed the 3% maximum cap of the total Cycle 3 budget.

**2. Conclusion**

Staff found no indication that Evergy Missouri Metro has acted imprudently regarding the selection and supervision of its EM&V contractors.

**3. Documents Reviewed**

- a. Evergy Missouri Metro’s Cycle 3 Plan;
- b. Approved MEEIA Energy Efficiency and Demand Side Management Programs Tariff Sheets; and
- c. Staff Data Requests: 0002, 0003, 0005, 0006, 0009, and 0017.

*Staff Expert: Stacy Henderson*

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<sup>20</sup> 20 CSR 4240-20.093(8)(A) Each utility’s EM&V budget shall not exceed five percent (5%) of the utility’s total budget for all approved demand-side program costs.

<sup>21</sup> See Table 3 for the breakout of programs between ADM and Guidehouse.

**D. MEEIA Labor**

**1. Description**

For MEEIA Cycle 3, Evergy Missouri Metro included labor costs that are allocated towards the MEEIA DSIM Rider and excluded from base rates in its cost of service. The Review Period during Staff’s review of April 1, 2023, through March 31, 2025, falls after the last general rate case, ER-2022-0129, which was effective January 2022. In the most recent general rate case, a total of 10 Full Time Employees (“FTEs”) and 5 part time employees were excluded from base rates. However, in its response to Staff Data Request No. 0022.4, Evergy Missouri Metro explained that it had incremental 1.5 FTEs assigned to MEEIA, driven by product management pilots specifically Urban Heat island, tracking and accounting after the retirement of an employee, and some other job functions that had minor fluctuations due to employee turnover and capital project allocation. Evergy Missouri Metro provided Staff with a file that included hours charged monthly to MEEIA by individual to total chargeable hours for those individuals. This file illustrated that the number of FTE hours charged to MEEIA was less than the number adjusted in the payroll true-up adjustments in the 2022 rate case. Evergy Missouri Metro also provided Staff with a file that included the total contract labor charged to MEEIA for the Review Period, the total hours worked, and a job description for the contract labor provided. All of this information provided assured Staff that the amount of labor included for recovery in MEEIA was not more than the amount of FTEs that are recoverable through the DSIM Rider.

**2. Conclusion**

Staff found no indication that Evergy Missouri Metro has acted imprudently regarding the calculation of MEEIA labor.

**3. Documents Reviewed**

- a. Evergy Missouri Metro’s Cycle 3 Plan; and
- b. Staff Data Requests: 0022, 0022.1, 0022.2, 0022.3, and 0022.4.

*Staff Expert: Brooke Mastrogiannis*

**E. Demand Response**

**1. Description**

**a. Residential Demand Response Program**

Evergy Missouri Metro’s residential demand response (DR) program offers smart thermostats at discounted prices—some starting at \$0—through the Evergy Marketplace. Customers can also enroll their own eligible smart thermostats and receive a \$100 incentive. Supported devices include models from Google Nest, ecobee, Sensi, and Honeywell. Participants are automatically enrolled in Energy Savings Events on very hot days, during which their thermostats adjust to reduce energy use. Customers receive a \$10 annual incentive starting in their second year of participation.

**b. Business Demand Response Program**

Evergy Missouri Metro’s Business Demand Response (BDR) program rewards commercial customers for reducing their electricity use during high-demand periods, typically on the hottest summer days. Participants work with Evergy to develop a customized plan to shift or eliminate energy use during these times. When a curtailment event occurs, Evergy notifies the business to implement their plan. After the season, Evergy calculates the reduction by comparing forecasted usage (based on past usage and weather) to actual usage and pays participants for the verified load reduction.

**2. Conclusion**

Staff found no indication that Evergy Missouri Metro has acted imprudently regarding the management of its Demand Response Programs.

**3. Documents Reviewed**

- a. Evergy Missouri Metro Responses to Staff Data Requests: 0021, 0026, 0027, and 0028.

*Staff Expert: Jordan T. Hull*

**VII. Throughput Disincentive (“TD”)**

**A. Actual TD**

**1. Description**

For a utility that operates under a traditional regulated utility model a “throughput disincentive” is created when a utility’s increase in revenues is linked directly to its increase in sales. This relationship between revenues and sales creates a financial disincentive for the utility to engage in any activity that would decrease sales, such as utility sponsored energy efficiency programs.

The TD allows the utility to recover its lost margin revenues associated with the successful implementation of the MEEIA programs. The Cycle 3 TD calculation is described in Evergy Missouri Metro’s Tariff Sheet Nos. 49U through 49W and Tariff Sheet No. 49Z (for the net margin revenue rates). The Cycle 4 TD calculation is described in Evergy Missouri Metro’s Tariff Sheet Nos. 49.4 through 49.6. Generally, the TD for each program is determined by multiplying the monthly energy savings<sup>22</sup> by the net margin revenue rates and by the net to gross factor for contemporaneous TD recovery.

Staff verified each component of the TD calculation that was provided by Evergy Missouri Metro in its response to Staff Data Request No. 0019. Staff recalculated a sample of the monthly TD calculations and found no errors. Staff also verified the TD calculation workpapers and compared the kWh savings impact and TD with the MEEIA rate adjustment filings, along with the QSMRs. In Staff Data Request No. 0019, Evergy Missouri Metro provided a reconciliation reflecting adjustments made to their TD calculation workpapers. Staff found no discrepancies between Evergy Missouri Metro’s TD calculation workpapers, QSMRs, and the MEEIA rate adjustment filings. The MEEIA rate adjustment filings and the QSMRs both demonstrate TD that customers are responsible for paying is \$0 for Cycle 4; \$8,445,951 for Cycle 3; and \$0 for Cycle 2.

**2. Conclusion**

Staff found no indication that Evergy Missouri Metro has acted imprudently regarding the calculation of its TD.

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<sup>22</sup> Monthly savings are obtained by taking the sum of all programs’ monthly savings and applying monthly loadshapes.



**3. Documents Reviewed**

- a. Evergy Missouri Metro's Cycle 2, Cycle 3, and Cycle 4 Plan;
- b. Tariff Sheets 49Q-49Z;
- c. Evergy Missouri Metro work papers included in Case No. ER-2023-0410, ER-2024-0184, ER-2024-0351, ER-2025-0173, and ER-2025-0325; and
- d. QSMR;
- e. Staff Data Requests: 0005, 0019, and 0023.

*Staff Expert: Teresa Denney*

**B. Gross Deemed Annual Energy and Demand Savings**

**1. Description**

Staff reviewed the monthly calculation of kWh savings from Evergy Missouri Metro's MEEIA Programs calculated with the Resource Innovations software. Evergy Missouri Metro provided Staff additional details supporting the Resource Innovations system results to show how the kWh savings were calculated during the Review Period.

To begin its review of Evergy Missouri Metro's calculations of its monthly kWh savings for the Review Period, Staff verified that the total kWhs and kW for each program as reported in Resource Innovations were in agreement with the QSMRs, the kWh savings used in the Throughput Disincentive calculations, and the Company workpapers provided.

The Company provided workpapers to support the kWh savings for the program measures. These workpapers provided individual detailed project savings pulled from Resource Innovations with a calculation of the kWh and kW savings per measure per customer. Staff chose a sample of program measures and compared the kWh savings as reported in the Company details to the measure savings as reported in the TRM and subsequent updates to the TRM.<sup>23</sup>

Staff also compared the Total Resource Cost ("TRC") test for each program to the TRC targets identified in the Cycle 3 Plan. Staff notes that in the Company response to Staff Data Request No. 0024, provides TRC results for Cycle 3 Program Year 2023 and Program Year 2024. Three programs reflected a TRC of less than 1.0 in Program Year 2023:

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<sup>23</sup> The TRM was updated in Case No. EO-2019-0132 by a Commission *Order Approving Modifications to Evergy Missouri Metro and Evergy Missouri West's Modified Technical Resource Manual* on December 21, 2022 and again by a Commission *Order Approving Evergy's Modified Technical Resource Manual* on December 20, 2023.

1   \*\* [REDACTED]  
2   [REDACTED] \*\* and two programs reflected a TRC of less than 1.0 in Program Year 2024:  
3   \*\* [REDACTED] \*\*. Commission Rule 20 CSR  
4   4240-20.094(6)(B) states in part that:

5           If the TRC calculated for a demand-side program not targeted to  
6           low-income customers or a general education campaign is not cost  
7           effective, the electric utility shall identify the causes why and present  
8           possible demand-side program modifications that could make the demand-  
9           side program cost-effective. If analysis of these modified demand-side  
10          program designs suggests that none would be cost effective, the demand-  
11          side program may be discontinued. In this case, the utility shall describe  
12          how it intends to end the demand-side program and how it intends to  
13          achieve the energy and demand savings initially estimated for the  
14          discontinued demand-side program. Nothing herein requires utilities to  
15          end any demand-side program which is subject to a cost-effectiveness test  
16          deemed not cost-effective immediately.

17          Although the Energy Savings Products and Heating, Cooling, and Weatherization  
18          Programs have a TRC lower than 1.0 during this Review Period, their cumulative TRC  
19          is 2.38 and 1.08 over Cycle 3.<sup>24</sup> The Commission approved the PAYS program for Cycle 4  
20          with new conditions, which includes a fast pass option, to improve the PAYS program.

21          In reviewing all sources of kWh savings and kW savings, Staff was able to verify the  
22          reported 65,943,805 kWh of energy savings and 55,402<sup>25</sup> kW of demand savings for the MEEIA  
23          Programs during the Review Period by reconciling the Quarterly Surveillance Reports, the  
24          Resource Innovations database, and the Company's workpapers provided.

## 25           **2. Conclusion**

26          Staff found no indication that Evergy Missouri Metro has acted imprudently regarding  
27          the calculation of the gross energy and demand savings.

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<sup>24</sup> It is Staff's position that Evergy Missouri Metro should only offer measures that have a TRC above 1, regardless of whether the TRC is over 1 at the program level. Staff is currently in discussions with Evergy Missouri Metro over this.

<sup>25</sup> This amount of kWh and kW savings is provided from Staff Data Request No. 0023 and is also reflected in Table 6 above. However, the amount in Table 2 for the deemed actual amount is 14,839 kW and 66,031,094 kWh as compared to 55,402 kW and 65,943,805 kWh in Table 6. For this difference, Evergy Metro states, in Data Request No. 0023 response, "The Company inadvertently included LED and Smart Thermostat kWh and kW savings without corresponding incentives during 2023's original reporting (LEDs were purchased by the customer and Smart Thermostats were rebated by the gas utility). The overstatement was retroactively corrected to December 2023 for throughput disincentive but trued-up in the period(s) of discovery for the Quarterly Surveillance Report."

**3. Documents Reviewed**

- a. Evergy Missouri Metro's Cycle 3 Plan;
- b. QSMR;
- c. Technical Resource Manual, updated 1-1-23 and 1-1-24; and
- d. Staff Data Requests: 0008, 0019, 0023, and 0024.

*Staff Expert: Teresa Denney*

**VIII. Earning Opportunity ("EO")**

**1. Description**

Commission Rule 20 CSR 4240-20.092(1)(S) defines the EO component of a DSIM as the methodology approved by the Commission in a utility's filing for demand-side program approval to allow the utility to receive an EO. The Rule further states that any EO component of a DSIM shall be implemented on a retrospective basis, and all energy and demand savings used to determine a DSIM EO amount shall be verified and documented through EM&V Reports.

Evergy Missouri Metro's 2nd Revised Tariff Sheet No. 49R defines the Cycle 3 EO as:

Cycle 3 Earnings Opportunity (EO) means the annual incentive ordered by the Commission based on actual performance verified through EM&V against planned targets. The Company's EO for 2020-2022 will be \$8,017,172 if 100% achievement of the planned targets are met. EO is capped at \$11,446,706. Potential Earnings Opportunity adjustments are described on Sheet No. 49X. The Earnings Opportunity Matrix outlining the payout rates, weightings, and caps can be found at Sheet No. 49Z. The Combined Companies' (Evergy Missouri Metro and Evergy Missouri West) EO for 2023 (Extension) will be \$4,733,030 if 100% achievement of the planned targets are met. The Combined Companies EO is capped at \$4,926,305. The total EO for 2024 (Extension) will be \$4,927,399. The formula for calculating the EO is \$4,927,399 x (actual spend / \$29,038,471). The EO vests at \$22,750,000 of actual spend. Potential Earnings Opportunity adjustments are described on Sheet No. 49AA and Sheet No. 49AB. The Combined Companies EO will be allocated to each jurisdiction by respective program cost spend.

Evergy Missouri Metro's Original Tariff Sheet No. 49.1 defines the Cycle 4 EO as:

Cycle 4 Earnings Opportunity (EO) means the annual incentive ordered by the Commission based on actual performance verified through EM&V against planned targets. The Combined Companies' (Evergy Missouri Metro and Evergy Missouri West) potential Cycle 4 EO for

non-demand-response programs available in either jurisdiction is \$2,256,439. The Evergy Missouri Metro potential Cycle 4 EO for demand-response programs is \$3,275,301. See tariff Sheet No. 49.9 for details of the EO metrics.

Staff reviewed the Cycle 3 EO from the calculations provided in response to Staff Data Request No. 0029 and the calculations in the DSIM Riders in dockets ER-2023-0410, ER-2024-0184, ER-2024-0351, ER-2025-0173, and ER-2025-0325 for the months in this Review Period. During the review, Staff was able to verify that Evergy Missouri Metro did not recover more than its approved EO for Cycle 3. EO awarded for Cycle 3 during this Review Period was \$4,994,359.52. There was no Cycle 4 EO recovered during the review period.

## **2. Conclusion**

Staff has verified that Evergy Missouri Metro did not recover more than its approved EO for Cycle 3 and Cycle 4.

## **3. Documents Reviewed**

- a. Evergy Missouri Metro's Cycle 3 and Cycle 4 Plan;
- b. Evergy Missouri Metro's Quarterly Surveillance Monitoring Report, Page 6;
- c. Tariff Sheets 49-49AB;
- d. Evergy Missouri Metro work papers included in Case No. ER-2023-0410, ER-2024-0184, ER-2024-0351, ER-2025-0173, and ER-2025-0325; and
- e. Staff Data Requests: 0002, 0003, 0009, and 0029.

*Staff Expert: Obianuju Ezenwanne*

## **IX. Interest Costs**

### **1. Description**

Staff reviewed the interest calculations for program costs and TD, broken out by cycles, as provided in Evergy Missouri Metro's response to Staff Data Request No. 0005 for the Review Period of April 1, 2023, through March 31, 2025. Evergy Missouri Metro's tariff sheets provide that for program costs and TD, "Such amounts shall include monthly interest on cumulative over- or under-balances at the Company's monthly Short-Term Borrowing Rate."

Staff verified the Company's average monthly short-term borrowing rates were applied correctly to the over- or under-recovered balances for program costs and TD.

During the Review Period, Evergy Missouri Metro's total for the interest amount accrued for the Company's program costs as reported on Evergy Missouri Metro's QSMRs were as follows:

**Table 8**  
**INTEREST**

	<b>For Review Period April 1, 2023 through March 31, 2025</b>	<b>(Over)/ Under Billed</b>	<b>Cumulative Interest</b>	<b>(Over)/ Under Billed</b>
MEEIA Cycle 2	\$ (1,042)	Over	\$ 308,979	Under
MEEIA Cycle 3	\$ 211,037	Under	\$ 119,952	Under
MEEIA Cycle 4	\$ (1,645)	Over	\$ (1,645)	Over
TD Cycle 2	\$ 75,900	Under	\$ 284,084	Under
TD Cycle 3	\$ 36,706	Under	\$ 44,318	Under
TD Cycle 4	\$ (167)	Over	\$ (167)	Over

## **2. Conclusion**

Staff verified that Evergy Missouri Metro's interest calculations and interest amounts are correct and are calculated properly on a monthly basis as provided in its response to Staff Data Request No. 0005 for the Review Period.

## **3. Documents Reviewed**

- Approved MEEIA Energy Efficiency and Demand Side Management Programs Tariff Sheets;
- Evergy Missouri Metro Quarterly Surveillance Monitoring Reports; and
- Staff Data Requests: 0005 and 0009.

*Staff Expert: Stacy Henderson*

## **Attached:**

**Confidential Attachment A**

**Confidential Attachment B**

**Confidential Attachment C**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of the Third Prudence Review     )  
of the Missouri Energy Efficiency Investment     )  
Act (MEEIA) Cycle 3 and First Prudence     )  
Review of MEEIA Cycle 4 Energy Efficiency     )  
Programs of Evergy Metro, Inc. d/b/a Evergy     )  
Missouri Metro     )

File No. EO-2025-0324

**AFFIDAVIT OF AMANDA C. CONNER**

STATE OF MISSOURI     )

)

ss.

COUNTY OF COLE     )

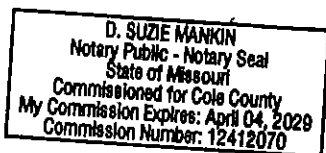
**COMES NOW AMANDA C. CONNER** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Report*; and that the same is true and correct according to her best knowledge and belief.

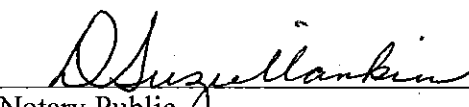
Further the Affiant sayeth not.

  
AMANDA C. CONNER

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 27<sup>th</sup> day of October 2025.



  
Notary Public

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of the Third Prudence Review	)	
of the Missouri Energy Efficiency Investment	)	File No. EO-2025-0324
Act (MEEIA) Cycle 3 and First Prudence	)	
Review of MEEIA Cycle 4 Energy Efficiency	)	
Programs of Evergy Metro, Inc. d/b/a Evergy	)	
Missouri Metro	)	

**AFFIDAVIT OF TERESA L. DENNEY**

STATE OF MISSOURI	)	
	)	ss.
COUNTY OF COLE	)	

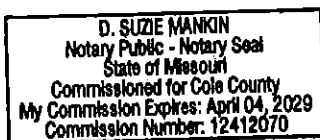
COMES NOW TERESA L. DENNEY and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Report*; and that the same is true and correct according to her best knowledge and belief.

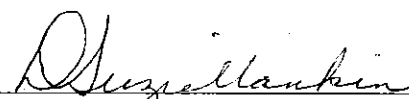
Further the Affiant sayeth not.

  
TERESA L. DENNEY

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 28th day of October 2025.



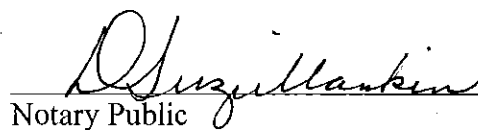
  
Notary Public

In the Matter of the Third Prudence Review )  
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Programs of Evergy Metro, Inc. d/b/a Evergy )  
Missouri Metro )

STATE OF MISSOURI            )  
  )  
COUNTY OF COLE            )            SS.

Further the Affiant sayeth not.

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 29<sup>th</sup> day of October 2025.





**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

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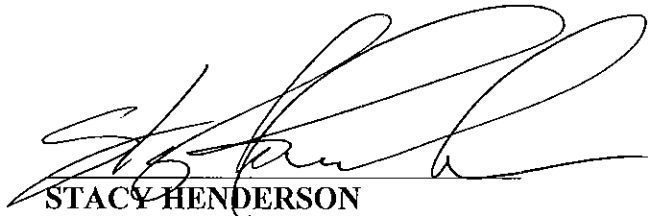
File No. EO-2025-0324

**AFFIDAVIT OF STACY HENDERSON**

STATE OF MISSOURI )  
 )  
COUNTY OF COLE ) ss.

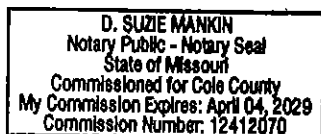
**COMES NOW STACY HENDERSON** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Report*; and that the same is true and correct according to her best knowledge and belief.

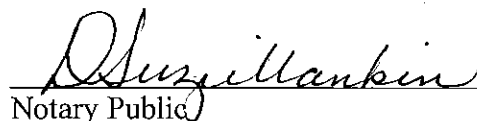
Further the Affiant sayeth not.

  
**STACY HENDERSON**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 29<sup>th</sup> day of October 2025.



  
Notary Public

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of the Third Prudence Review )  
of the Missouri Energy Efficiency Investment ) File No. EO-2025-0324  
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Missouri Metro )

**AFFIDAVIT OF JORDAN T. HULL**

STATE OF MISSOURI )  
 )  
COUNTY OF COLE ) ss.

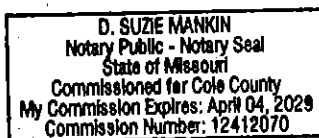
**COMES NOW JORDAN T. HULL** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Report*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

  
\_\_\_\_\_  
**JORDAN T. HULL**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri; at my office in Jefferson City, on this 27<sup>th</sup> day of October 2025.



  
\_\_\_\_\_  
Notary Public

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of the Third Prudence Review     )  
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Missouri Metro     )

File No. EO-2025-0324

**AFFIDAVIT OF BROOKE MASTROGIANNIS**

STATE OF MISSOURI     )  
                                      )  
COUNTY OF COLE     )     ss.

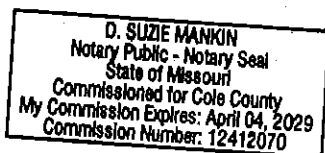
**COMES NOW BROOKE MASTROGIANNIS** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Report*; and that the same is true and correct according to her best knowledge and belief.

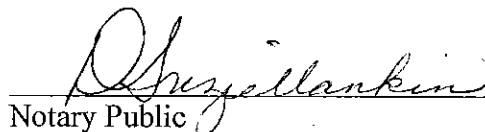
Further the Affiant sayeth not.

  
BROOKE MASTROGIANNIS

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 27<sup>th</sup> day of October 2025.



  
Notary Public

**File No. EO-2025-0324**

**ATTACHMENT A through C**

**HAVE BEEN DEEMED**

**CONFIDENTIAL**

**IN THEIR ENTIRETY**