Exhibit No.:	
Issue:	*Evergy West SIL Tariff- Nucor Participation in MEEIA*
Witness:	*Jordan T. Hull*
Sponsoring Party:	*MoPSC Staff*
Type of Exhibit:	*Rebuttal Testimony*
Case No.:	*EO-2026-0129*
Date Testimony Prepared:	*March 30, 2026*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

REBUTTAL TESTIMONY

OF

JORDAN T. HULL

EVERGY MISSOURI WEST, INC., d/b/a EVERGY MISSOURI WEST

CASE NO. EO-2026-0129

Jefferson City, Missouri
March 2026

** Denotes Confidential Information **

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REBUTTAL TESTIMONY

OF

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EVERGY MISSOURI WEST, INC.,
d/b/a EVERGY MISSOURI WEST

CASE NO. EO-2026-0129

REBUTTAL TESTIMONY

OF

JORDAN T. HULL

EVERGY MISSOURI WEST, INC.,
d/b/a EVERGY MISSOURI WEST

CASE NO. EO-2026-0129

Q. Please state your name and business address.

A. Jordan T. Hull, 200 Madison Street, Jefferson City, Missouri 65101.

Q. By whom are you employed and in what capacity?

A. I am employed by the Missouri Public Service Commission ("Commission") as an Associate Engineer in the Energy Resources Department.

Q. Please describe your educational background and work experience.

A. Please refer to the attached Schedule JTH-r1.

Q. Have you previously filed testimony before this Commission?

A. Yes, I have. Please refer to the attached Schedule JTH-r1 for a list of cases in which I have previously filed testimony.

Executive Summary

Q. Please summarize your rebuttal testimony in this proceeding.

A. The purpose of my rebuttal testimony is to respond to the direct testimony of Evergy Missouri West Inc., d/b/a Evergy Missouri West ("Evergy Missouri West" or "EMW") witness Mr. Brian A. File regarding Evergy Missouri West asking for a contract amendment permitting Nucor Steel Sedalia, LLC ("Nucor") to participate in a demand response programs.

Nucor's Special Rate for Incremental Load Service Schedule SIL ("SIL") tariff[1] does not currently permit participation.[2] Staff recommends that if the Commission wants to permit Nucor to participate in demand response, then the EMW and Nucor need to explore alternative ways that do not rely on ratepayer funding,[3] while still delivering curtailment benefits to ratepayers, capacity accreditation for Evergy Missouri West, and financial benefits to both Evergy Missouri West and Nucor.

Nucor MEEIA Participation background

Q. Why is Nucor not currently allowed to participate in the business demand response program?

A. Nucor currently operates under the SIL tariff. Sheet No. 157 states:

> Service under this tariff may not be combined with service under an Economic Development Rider, an Economic Redevelopment Rider, the Renewable Energy Rider, Community Solar program, service as a Special Contract, or be eligible for participation in programs offered pursuant to the Missouri Energy Efficiency Investment Act, or for participation in programs related to demand response or off-peak discounts, unless otherwise ordered by the Commission when approving a contract for service under this tariff.

Q. Based on this SIL tariff language, is Nucor currently able to participate in demand response in MEEIA or any type of demand response program outside of MEEIA?

A. No.

[1] P.S.C. MO. No. 1 Original Sheet Nos. 157 – 157.3.
[2] SIL tariff Sheet No. 157 states: Service under this tariff may not be combined with service under an Economic Development Rider, an Economic Redevelopment Rider, the Renewable Energy Rider, Community Solar program, service as a Special Contract, or be eligible for participation in programs offered pursuant to the Missouri Energy Efficiency Investment Act, or for participation in programs related to demand response or off-peak discounts, unless otherwise ordered by the Commission when approving a contract for service under this tariff.
[3] Evergy's Business Demand Response Program is a Missouri Energy Efficiency Investment Act (MEEIA) program that is ratepayer funded through the Demand Side Programs Investment Mechanism (DSIM) charge.

Q. What is Evergy Missouri West's MEEIA business demand response program?

A. Evergy Missouri West's MEEIA business demand response program compensates commercial customers who reduce, or curtail, their electrical load during high-demand days. Participants work with Evergy Missouri West to identify electrical load that can be eliminated or shifted during curtailment events, which are typically during the hottest days of the summer. Evergy Missouri West and the participants work together to determine which strategies meet participants' unique business needs and create a curtailment plan. When curtailment events are anticipated, Evergy Missouri West will notify the participant with instructions to execute their plan. At the end of the curtailment season, Evergy Missouri West pays the participant incentives for the load reduced using its approved MEEIA budget, which is ratepayer funded.

Q. Has Evergy Missouri West allowed Nucor to participate in its MEEIA business demand response program in the past?

A. Yes, according to the EMW's response to Data Request No. 0022 from EO-2023-0408, Nucor was a participant in Evergy Missouri West's business demand response program for the MEEIA prudence review period of April 1, 2021 through March 31, 2023.

Q. What was Staff's response to the discovery that Evergy Missouri West included Nucor in its business demand response program?

A. Staff identified this as a violation of the SIL tariff. Staff recommended a disallowance in EO-2023-0408, highlighting that Nucor was paid ** [redacted] ** in incentives to participate in Evergy Missouri West's demand response program.

Q. How much of an earnings opportunity was awarded to Evergy Missouri West by letting Nucor participate in the business demand response program?

A. From Mr. File's direct testimony in EO-2023-0408, Nucor curtailed 18.9071 MW in 2021 and 19.025 MW in 2022. [4] According to its earnings opportunity matrix for its MEEIA Cycle 3 application (Case No. EO-2019-0132), EMW is awarded $10,000/MW curtailed for its business demand response portion of the earnings opportunity. This equates to Evergy Missouri West receiving an additional ** [redacted] ** in earnings opportunity from ratepayers for both 2021 and 2022. Therefore, because Evergy Missouri West allowed Nucor to participate in the MEEIA demand response program, ** [redacted] ** of the total earnings opportunity received by Evergy Missouri West for business demand response was derived from Nucor's participation over that review period.

Q. Is there some amount of administrative costs that were recovered by ratepayers from Nucor's participation in the MEEIA business demand response program?

A. Due to the percentage of the total earnings opportunity received by EMW in regards to Nucor's participation, it is reasonable to infer a large portion of administrative costs would have inherently been dedicated to Nucor's participation in the business demand response program. However, Staff does not have the information needed to quantify what the administrative costs associated with Nucor would be.

Q. Who pays for the incentive costs to Nucor as well as the earnings opportunity and administrative program costs to Evergy Missouri West?

A. All Evergy Missouri West ratepayers, excluding opt-out customers and Nucor. Nucor does not currently pay the MEEIA charge through rates as the SIL Tariff doesn't allow them to participate in any of the MEEIA related programs. Therefore, they are considered

[4] Staff has concern with the reliability of these values based on the way that EMW is calculating their demand response baseline for Nucor as compared to the SPP tariff rule and how SPP calculates the baseline.

an opt-out customer. Nucor is also the only customer served by Evergy Missouri West under the SIL tariff.

Other Demand Response Options

Q. Is Staff against Nucor participating in a demand response program outside of MEEIA?

A. No, Staff would agree it makes sense for one of Evergy Missouri West's largest customers to participate in curtailments to provide system benefits in circumstances where the grid is strained.

Q. Are there options for demand response programs that are not ratepayer funded[5] and still provide curtailment benefits for Evergy Missouri West customers and a financial benefit for Nucor and Evergy Missouri West for participating?

A. Yes. Missouri customers, particularly larger commercial and industrial loads, may participate in regional wholesale demand response markets operated by the Midcontinent Independent System Operator, Inc. ("MISO") and the Southwest Power Pool ("SPP"). These markets compensate participants for reducing load during periods of system stress by partaking as a market participant. Recent regulatory changes in Missouri[6] have lifted prior restrictions, allowing larger customers to participate either directly or through third-party Aggregators of Retail Customers ("ARCs"). As a result, companies can work with an ARC or the utility to bid load reductions into wholesale markets and earn revenue independent of

[5] Evergy's Business Demand Response Program is a Missouri Energy Efficiency Investment Act (MEEIA) program that is ratepayer funded through the Demand Side Programs Investment Mechanism (DSIM) charge.
[6] *Order Partially Modifying the Commission's 2010 Order Regarding ARCs*, effective December 11, 2023, in EW-2021-0267.

Evergy Missouri West's MEEIA tariffs. Lastly, EMW has other demand response tariffs available to use, as explained further in my testimony below.

Q. What kind of demand response tariff does SPP offer?

A. Demand Response ("DR") is authorized in SPP by a tariff market mechanism that allow electricity consumers to reduce or shift their electricity usage in response to grid conditions, high wholesale prices, or reliability needs. SPP recognizes two main types of demand response resources:[7]

- Dispatchable Demand Response Resource ("DDR"): Load reductions that can be dispatched by SPP (i.e., controlled in real time).
- Block Demand Response Resource ("BDR"): Load reductions that are not real-time dispatchable but can still reduce grid withdrawals under instruction.

Both of these demand response resources are described in more detail in the SPP Open Access Transmission Tariff attached to my testimony as Schedule JTH-r2.

Q. Which type of demand response would Nucor most likely participate in?

A. Based on Nucor's previous curtailment it is most likely they would be considered a Block Demand Response Resource.

Q. How does this SPP DR tariff work?

A. DR participants can bid into SPP's energy and ancillary services markets, meaning participants may earn compensation when their load reduction helps balance supply and demand. DR can also count toward a utility's resource adequacy requirements

[7] SPP Markets+ slideshow, 6/28/2022, Page 8, https://www.spp.org/documents/67367/mppf%20participation%20models%20and%20mitigation%206%2028%202022.pdf.

(i.e., the demonstration that there is enough capacity to meet peak loads). This helps entities meet seasonal capacity obligations and can be counted towards capacity accreditation.[8]

Q. Are there incentives and payments made for participating in SPP's DR Program?

A. Participants in demand response programs receive compensation or incentives for committing to reduce electricity consumption or for lowering their load when called upon. Payments may be linked to capacity obligations or performance in energy markets, and market-based payments can occur when demand reductions help supply energy during periods of high prices. The specific payment structure depends on how the demand response resource is registered and the market product in which it participates. Payments are made to the registered Market Participant, which may be a utility, a retail electric provider, or a curtailment service provider (aggregator). End-use customers (such as Nucor in this case) are then compensated according to private contractual arrangements with that participating entity.[9] A contract will be agreed upon between the two parties for how much of an incentive the end-use customer will receive for curtailing. To participate in Demand Response through EMW, Staff's position is that Nucor should use the Market Based Demand Response ("MBDR") tariff, explained further below in my testimony.

Q. Can Utilities count the curtailments toward capacity accreditation?

A. SPP uses a resource adequacy framework where Load Responsible Entities ("LREs") must show sufficient capacity for peak seasons. Demand response may receive accredited capacity value and be counted toward a utility's seasonal planning reserve margin.

[8] The Capacity Accreditation of Demand Response in SPP, October 2025, Page 2, E3-White-Paper_Demand-Resonse-in-SPP.pdf.
[9] Market Protocols SPP Integrated Marketplace, Revision 37, Latest Revision, 4.2.2.5.2 Block Demand Response Resources, pages 125-126, 5/02/2016.

The accredited amount depends on historical performance, availability during peak hours, and testing results.[10]

Q. What are the qualifications to participate in this SPP Demand Response tariff?

A. To qualify for SPP's DR tariff and register as a resource that participates in the integrated wholesale market, a candidate must:

- Be a controllable load (DDR as mentioned above) or measurable curtailment (BDR as mentioned above) that can reduce electricity withdrawal.
- Submit required legal and capacity certification as part of registration.
- Install appropriate telemetry, metering, and communication systems.
- Meet SPP's technical requirements for verification and baseline reporting.

All qualified demand response resources must have proper metering and verification systems so SPP can determine how much load is reduced. Interval or faster metering is required. Baseline load profiles must be submitted to SPP to ensure accurate settlement and capacity accreditation.[11]

Q. What are the technical requirements for verification and baseline of the block demand response tariff?

A. According to SPP's Open Access Transmission Tariff:

> The Market Participant must submit an hourly baseline for the Demand Response Load indicating the level of energy consumption expected at that location in MWh if the Demand Response Resource is not dispatched. The baseline must cover, at a minimum, all hours the Resource is submitting Offers for in the Energy and Operating Reserve Markets. This baseline must be submitted by 1100 hours on the day prior to the Operating Day and may be updated up to thirty (30) minutes in advance of the operating hour. The baseline should be based on the

[10] SPP Planning Criteria, Revision 4.3A, Section 7.1.10, Testing Requirements and Accreditation for Demand Response Programs. Pages 50-52, Feb 9, 2024.
[11] Market Protocols SPP Integrated Marketplace, Revision 10.0a FERC Compliance, Section 4.2.2.5.2 Block Demand Response Resource, pages 100-102, Latest version 2/28/2023.

> average of the hourly integrated Demand Response Load for the same hours in the last 30 calendar days when the Resource was not dispatched, adjusted by the Market Participant as necessary to account for changes in the expected level of energy consumption by the Demand Response Load. If there have been deviations in hourly integrated metered load from the hourly baseline during periods when the Resource was not dispatched the hourly baseline will be adjusted as follows by the Transmission Provider prior to the calculation of the Demand Response Load. If the average of the hourly deviation between integrated metered load and submitted hourly baseline for the hours in the last thirty (30) calendar days when the Resource was not dispatched is more than five percent (5%) below the hourly baseline, the hourly baseline will be adjusted by the average deviation. The Transmission Provider will perform this assessment each day and notify the Market Participant of any adjustment. If the hourly baseline has not been submitted, the Transmission Provider shall set the hourly baseline equal to the Real-Time consumption of the Demand Response Load associated with the Demand Response Resource in the Dispatch Interval immediately preceding initial commitment of the Demand Response Resource.[12]

Q. How are the settlements calculated and are there performance penalties?

A. Compensation depends on verified performance. A baseline load is first calculated, and actual metered consumption is then compared against that baseline. Payment is based only on the amount of load reduction that can be verified through this comparison. If performance falls short of the expected reduction, payments are reduced accordingly, and in some cases penalties may also apply.[13]

Q. Does the Evergy Missouri West business demand response program have similar requirements for performance measurement?

A. No, the SPP demand response program requires participants to deliver highly verified and measurable energy reductions, making it significantly more rigorous than Evergy

[12] Open Access Transmission Tariff, Sixth Revised Volume No. 1, Attachment AE Integrated Marketplace, Section 4.1.2.1 (2) Block Demand Response Resource.
[13] Ibid.

Missouri West's program. Under SPP, savings must be backed by detailed baseline calculations, real-time performance data, and strict compliance with dispatch instructions, ensuring that any committed load reductions are both reliable and auditable. In contrast, Evergy Missouri West's demand response program is generally more flexible, with less stringent measurement and verification requirements, allowing for easier participation but with less emphasis on precision and enforceability. As a result, while SPP's program can offer greater credibility and integration into wholesale energy markets, it also demands a higher level of operational discipline and accuracy from participants. One example of this is regarding calculating an accurate baseline. Evergy Missouri West uses the customer baseline load (CBL) model or Day averaging whereas SPP required a hourly baseline from the last 30 calendar days as mentioned above. Justin Tevie provides more details on the current CBL model and the volatility of Nucor's Load in his rebuttal testimony in this case.

Q. Do you believe Evergy Missouri West could receive this compensation if it bid demand response as a Dispatchable Demand Response Resource or a Block Demand Response Resource?

A. Yes, if Evergy Missouri West can meet SPP's technical requirements for verification and baseline reporting. However, Staff has concerns with Nucor's baseline reporting; this is further discussed in Staff witness Justin Tevie's rebuttal testimony.

Q. Would Nucor participation in a non-MEEIA DR better protect EMW's other ratepayers?

A. Participation in a non-MEEIA DR better protects Evergy Missouri West customers as SPP has baseline reporting parameters that would be a better fit for Nucor's load type. Better measuring and baseline reporting ensures that customers are actually receiving

system benefits by verified curtailment, and if done outside MEEIA then ratepayers are not paying for the participation, but are still receiving benefits.

Q. Does EMW already have a demand response tariff in which they could operate demand response curtailments in the SPP marketplace?

A. Yes EMW has the Schedule MBDR tariff at Sheet Nos. 156-156.3. It is described as:

> The Market Based Demand Response Program (MBDR) offers qualified business demand response (BDR) (formerly known as demand response incentive (DRI)) participants an additional opportunity to reduce their electric costs through participation with Evergy in the wholesale Southwest Power Pool (SPP) energy market by providing load reduction during high price periods in the market and declared emergency events. Participation in this Program authorizes Evergy to offer the Customer's Curtailment Amount in the SPP Integrated Marketplace and to compensate Participants based on any SPP settlement payments. This Program is available to BDR participants whose demand response (DR) resources are compliant with the SPP tariff and SPP Marketplace Protocol requirements and can provide sustainable load reduction during a Curtailment Event. The Participant's DR Resources will be registered in the SPP Real Time and Day Ahead Energy Market as either Bulk Demand Response Resources or Dispatchable Demand Response Resources. [Headings omitted.][14]

Q. Is Staff aware of any participants in this tariff currently?

A. Not currently.

Q. If EMW allowed Nucor to participate in Demand Response under the MBDR tariff, would EMW or Nucor still receive benefits?

A. Yes. The participant compensation is defined on the MBDR tariff Original Sheet No. 156.2. It is summarized as: Based upon the Participant's performance related to SPP-cleared offers, SPP will calculate the settlement payment for each market operating day.

[14] P.S.C. MO. No. 1, 1st Revised Sheet No. 156.

EMW will remit to the Participant the net proceeds as a credit (or charge) on the Participant's monthly bill. EMW would also receive the market settlement fees as described in the MBDR tariff Original Sheet No. 156.3. It is summarized as: the marginal forgone retail rate ("MFRR") plus a percentage of the net SPP market settlements to offset ongoing program transaction costs.

Q. Is there any other way for Nucor to participate in demand response, outside of MEEIA?

A. Yes. As I mentioned earlier in my rebuttal testimony, recent regulatory changes in Missouri have lifted prior restrictions, allowing larger customers to participate either directly or through third-party Aggregators of Retail Customers ("ARCs"). Therefore, Nucor could participate in demand response through an ARC.

Q. What is an aggregator (ARC)?

A. An electricity aggregator is a company or organization that combines the electricity demand or supply of many customers and participates in energy markets on their behalf. By pooling many smaller resources together, aggregators create a large enough resource to buy, sell, or adjust electricity in wholesale markets. An aggregator acts as an intermediate between customers and the electricity market. They gather multiple participants (homes, businesses, or generators) and coordinate them as a single resource.

Q. For Staff's recommended demand response options, outside of MEEIA, would EMW still have to amend its contract language?

A. Yes, EMW would still have to amend its contract with Nucor to permit Nucor to participate in Staff' recommended demand response options outside of MEEIA. Staff proposes the following language for the amendment:

** [redacted] **

Conclusion

Q. What is Staff's recommendation?

A. Staff recommends that if the Commission wants to permit Nucor to participate in demand response then the Commission should require EMW to do so through an option outside of MEEIA, as there are demand response participation pathways available that do not rely on ratepayer funding but still provide the same type of benefits to customers, accreditation benefits to Evergy Missouri West, and financial incentives to both Evergy Missouri West and Nucor. This would require an amendment of a contract to allow Nucor's participation in any demand response programs, except MEEIA, as mentioned above.

Q. Does this conclude your rebuttal testimony?

A. Yes

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Approval of an Amendment to Nucor Steel Sedalia, LLC Agreement	)))))	Case No. EO-2026-0129

AFFIDAVIT OF JORDAN T. HULL

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

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 *Rebuttal Testimony of Jordan T. Hull;* and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

Jordan Hull

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 25th day of March 2026.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2027
Commission Number: 15207377

Dianna L. Vaught

Notary Public

Jordan T. Hull

CURRENT POSITION:

I am currently an Associate Engineer in the Energy Resources Department, Industry Analysis Division, of the Missouri Public Service Commission.

EDUCATIONAL BACKGROUND & WORK EXPERIENCE:

I received my Bachelor of Science Degree in Biological Engineering from the University of Missouri-Columbia in May of 2016. In June of 2016 I began employment with the Missouri Department of Natural Resources in the Air Pollution Control Program as an Environmental Engineer I. In June of 2017, I was promoted to an Environmental Engineer II within the Air Pollution Control Program. I began employment with the commission in November of 2018.

Summary of Case Involvement:

Case Number	Utility	Type	Issues
EO-2019-0067	KCP&L GMO	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2019-0068	KCP&L	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2019-0049	Liberty-Empire Electric Company	Integrated Resource Plan	Misc.
EO-2019-0132 & EO-2019-0133	KCP&L	MEEIA	Misc.
EO-2019-0257	Ameren- Missouri	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
ER-2019-0335	Ameren- Missouri	Rate Case	Heat Rates
ER-2019-0374	Liberty-Empire Electric Company	Rate Case	Heat Rates
EO-2020-0059	Liberty-Empire Electric Company	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2020-0262	EvergyWest	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization, Self-Commitment.

cont'd Case Participation
Jordan T. Hull

Case Number	Utility	Type	Issues
EO-2020-0263	Evergy Metro	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0060	Ameren- Missouri	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0021	Ameren- Missouri	Integrated Resource Plan	Misc.
EO-2021-0281	Liberty- Empire	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0035	Evergy- Metro	Integrated Resource Plan	Misc.
EO-2021-0036	Evergy- West	Integrated Resource Plan	Misc.
EO-2021-0060	Ameren- Missouri	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
ER-2021-0240	Ameren- Missouri	Rate Case	Heat Rate
ER-2021-0312	Liberty- Empire	Rate Case	Heat Rate
EO-2021-0331	Liberty Empire	Integrated Resource Plan	Misc.
EA-2022-0099	Ameren- Missouri	CCN	Qualified to construct
EO-2022-0337	Ameren- Missouri	Rate case	Heat Rate
E0-2022-0245	Ameren- Missouri	CCN	Qualified to construct
EO-2023-0087	Liberty- Empire	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EA-2023-0017	Grain Belt Express LLC	CCN	Qualified to construct
EO-2023-0180	Ameren- Missouri	MEEIA Prudency Review	Demand Response
EO-2023-0407	Evergy-Metro	MEEIA Prudency Review	Demand Response
EO-2023-0408	Evergy-West	MEEIA Prudency Review	Demand Response
EO-2024-0020	Ameren-Missouri	Integrated Resource Plan	Misc.

cont'd Case Participation
Jordan T. Hull

Case Number	Utility	Type	Issues
EO-2024-0053	Ameren-Missouri	FAC Prudence Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EO-2024-0153	Evergy-Metro	Integrated Resource Plan	Misc.
EO-2024-0154	Evergy-West	Integrated Resource Plan	Misc.
EO-2024-0241	Liberty-Empire	FAC Prudence Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EO-2025-0073	Evergy-Metro	FAC Prudence Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EO-2025-0074	Evergy-West	FAC Prudence Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EO-2025-0169	Ameren-Missouri	MEEIA Prudence Review	Demand Response
EO-2025-0236	Ameren- Missouri	FAC Prudence Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EO-2025-0323	Evergy Missouri-West	MEEIA Prudence Review	Demand Response
EO-2025-0324	Evergy Missouri-Metro	MEEIA Prudence Review	Demand Response
EO-2026-0057	Liberty- Empire	FAC Prudence Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment

4.1.2 Additional Provisions for Non-Traditional Resources

4.1.2.1 Demand Response Resources

(1) Dispatchable Demand Response Resource - A Dispatchable Demand Response Resource is modeled in the Commercial Model the same as any other Resource, except that the Settlement Location associated with the Dispatchable Demand Response Resource must contain the Price Node, or aggregated Price Node as described in Section 2.2(2) of this Attachment AE, associated with the Demand Response Load. The Market Participant must submit the Real-Time value of the Demand Response Load to the Transmission Provider via telemetering that meets the technical requirements specified in the Market Protocols. A Dispatchable Demand Response Resource shall submit Energy Offer Curves based on the criteria in Section 3.2(F) of Attachment AF of this Tariff. For purposes of these Resources, the short-run marginal cost may equal opportunity cost. A Dispatchable Demand Response Resource may select one of two options for reporting of the actual Dispatchable Demand Response Resource output:

(a) Submitted Resource production option:

The Dispatchable Demand Response Resource output is sent directly to the Transmission Provider by the Market Participant via telemetering for Real-Time operational purposes and the Meter Agent submits either five (5) minute or hourly actual output values to the Transmission Provider for use in settlements. The submitted Resource production option is only allowed for Demand Response Resources that are: (1) utilizing strictly Behind-The-Meter Generation to provide the response and are utilizing Real-Time metering capable of reporting both the Behind-The-Meter Generation output and the load; (2) Demand Response Resources where the Market Participant is offering the Resource under a retail tariff provision that includes near Real-Time measurement and verification terms that are compliant with the Business Practices for Measurement and Verification of Wholesale Electricity Demand Response of the North American Energy Standards Board, incorporated by reference in the Commission's Regulations, 18 C.F.R. § 38.2(a)(12); or (3) Demand Response Load utilizing near Real-Time measurement and verification capability that is

compliant with the Business Practices for Measurement and Verification of Wholesale Electricity Demand Response of the North American Energy Standards Board, incorporated by reference in the Commission's Regulations, 18 C.F.R. § 38.2(a)(12).

(b) Calculated Resource production option:

(i) For each Dispatch Interval in each hour in which the Demand Response Resource has been committed, the Demand Response Resource output for Real-Time operational purposes is calculated by the Transmission Provider as the greater of zero (0) or the difference between:

- The lesser of the Real-Time consumption of the Demand Response Load associated with the Demand Response Resource in the Dispatch Interval immediately preceding initial commitment of the Demand Response Resource or the hourly baseline as described in (3) below for the hour, and
- The actual value of the associated Demand Response Load received via telemetering.

(ii) For each Dispatch Interval in each hour in which the Demand Response Resource has been committed, the Demand Response Resource output for settlement purposes is calculated by the Transmission Provider as the maximum of zero (0) or the difference between:

- The lesser of the Real-Time consumption of the Demand Response Load associated with the Demand Response Resource in the Dispatch Interval immediately preceding initial commitment of the Demand Response Resource or the hourly baseline as described in (3) below for the hour, and
- The actual value of the associated Demand Response Load received from the Meter Agent either on a five (5) minute basis or an hourly basis.

(2) Block Demand Response Resource – A Block Demand Response Resource is modeled in the Commercial Model the same as any other Resource except that the Settlement Location associated with the Block Demand Response Resource must contain the Price Node, or aggregated Price Node as described in Section 2.2(2) of this Attachment AE, associated with the Demand Response Load. The Market Participant must submit the Real-Time value of the Demand Response Load to the Transmission Provider via telemetering that meets the technical requirements specified in the Market Protocols. All Block Demand Response Resources will use the calculated Resource production option, described in Section 4.1.2.1(1)(b) above, to determine the amount of Real-Time Resource production and actual Resource production.

(a) If the Block Demand Response Resource is committed and dispatched in the Day-Ahead Market, Day-Ahead RUC or Intra-Day RUC, the Block Demand Response Resource's Minimum Economic Capacity Operating Limit will be increased in the RTBM to match the dispatched amount. Spinning Reserve or Supplemental Reserve will be allowed to clear above minimum output if the Block Demand Response Resource is a Spin Qualified Resource and Supplemental Reserve will be allowed to clear above minimum output if the Block Demand Response Resource is a Supplemental Qualified Resource.

(b) Spinning Reserve and/or Supplemental Reserve clearing will be based upon submitted ramp rates for the Block Demand Response Resource, the submitted Spinning Reserve Offer, the Supplemental Reserve Offer and the Block Demand Response Resource's Maximum Economic Capacity Operating Limit.

(3) Hourly Baseline

(a) The Market Participant must submit an hourly baseline for the Demand Response Load indicating the level of energy consumption expected at that location in MWh if the Demand Response Resource is not dispatched. The baseline must cover, at a minimum, all hours the Resource is submitting Offers for in the Energy and Operating Reserve Markets. This baseline must be submitted by 1100 hours on the day prior to the Operating Day and may be updated up to thirty (30) minutes in advance of the operating hour. The baseline should be based on the average of the hourly integrated Demand Response Load for the same hours in the last 30 calendar days

when the Resource was not dispatched, adjusted by the Market Participant as necessary to account for changes in the expected level of energy consumption by the Demand Response Load.

(b) If there have been deviations in hourly integrated metered load from the hourly baseline during periods when the Resource was not dispatched the hourly baseline will be adjusted as follows by the Transmission Provider prior to the calculation of the Demand Response Load. If the average of the hourly deviation between integrated metered load and submitted hourly baseline for the hours in the last thirty (30) calendar days when the Resource was not dispatched is more than five percent (5%) below the hourly baseline, the hourly baseline will be adjusted by the average deviation. The Transmission Provider will perform this assessment each day and notify the Market Participant of any adjustment.

(c) If the hourly baseline has not been submitted, the Transmission Provider shall set the hourly baseline equal to the Real-Time consumption of the Demand Response Load associated with the Demand Response Resource in the Dispatch Interval immediately preceding initial commitment of the Demand Response Resource.