Exhibit No.:	
Issues:	Customer Battery Programs
Witness:	Philip A. Fracica
Sponsoring Party:	Renew Missouri Advocates
Type of Exhibit:	Surrebuttal Testimony
Case No.:	ER-2026-0143
Testimony Filed:	September 10, 2026

MISSOURI PUBLIC SERVICE COMMISSION

ER-2026-0143
SURREBUTTAL TESTIMONY

OF

PHILIP A. FRACICA

ON BEHALF OF

RENEW MISSOURI ADVOCATES

September 10, 2026

PURPOSE OF TESTIMONY AND INTRODUCTION

Q. PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.

A. My name is Philip A. Fracica, Director of Programs for Renew Missouri. My business address is 501 Fay Street Suite 206, Columbia, Missouri, 65201.

Q. ARE YOU THE SAME PERSON WHO FILED REBUTTAL TESTIMONY ON AUGUST 11th CONCERNING EVERGY WITNESSES MCDONALD AND LUTZ?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTAL TESTIMONY?

A. The purpose of my surrebuttal testimony is to respond to the recommendations of Staff witness Shawn E. Lange concerning the customer battery programs proposed in my direct testimony. Staff does not oppose the concept of customer battery programs but recommends several conditions addressing eligibility, cost controls, cost allocation, reporting, and evaluation. I generally support Staff's recommendations for a cost-benefit analysis, clear learning objectives, separate accounting, semiannual reporting, and a defined pilot period or transition plan. However, I believe additional clarification is needed regarding program eligibility, the appropriate timing of a commercial and industrial program cap, and the allocation of costs between participating and nonparticipating customers.

Q. STAFF RECCOMENDS THAT THE BATTERY PROGRAMS BE AVAILABLE TO ALL ELIGIBLE EVERGY MISSOURI METRO CUSTOMES. DO YOU AGREE?

A. I agree with Staff's broader objective of expanding customer access to battery storage. However, my proposal includes three complementary pilots because different battery installations provide different customer and system benefits. The Residential Battery Demand Response Pilot would compensate customers who voluntarily allow Evergy to dispatch their batteries during demand response events. The Targeted Residential Grid Support Rebate Pilot would provide upfront incentives in areas where batteries could address identified distribution-system needs. The Large Customer Battery Partnership Pilot would evaluate utility-owned batteries hosted at qualifying commercial and industrial sites.

These programs collectively provide multiple participation pathways, but each program should be designed around the benefit it is intended to provide. In my opinion, requiring every individual pilot to be available to every customer would be inconsistent with that approach. We proposed a targeted structure to provide greater assurance that any costs recovered from the broader customer base would be supported by measurable system benefits. However, Renew Missouri is open to further input from Staff and other stakeholders regarding how broader eligibility could be incorporated into a subsequent phase or tranche without diminishing those system benefits.

Q. WHY DID YOU RECOMMEND TARGETING THE RESIDENTIAL GRID SUPPORT REBATE PILOT TO PARTICULAR AREAS?

A. As discussed in my direct testimony, Evergy could initially identify a limited number of distribution circuits experiencing capacity constraints, recurring overloads, reliability concerns, or anticipated infrastructure upgrades. Batteries located in those areas may reduce peak demand, improve reliability, defer transformer replacements, or postpone other distribution investments.

The targeted design is intended to provide greater assurance that ratepayer-supported incentives produce benefits for the broader electric system. A systemwide rebate could provide the same incentive to batteries that offer materially different levels of system value. This approach is similar to Evergy’s existing practice of considering long-term system value when determining line-extension contributions and providing discounted extensions for customers locating on underutilized circuits.

Q. COULD EVERGY EXPAND THE RESIDENTIAL PROGRAMS AFTER COMPLETING AN INITIAL TARGETED ROLLOUT?

A. Yes. I am open to Evergy proposing a second tranche or another form of phased expansion after sufficient operational information has been collected. Based on participation, dispatch performance, distribution-system impacts, and the results of the cost-benefit analysis, Evergy could expand the number of eligible circuits, broaden demand response participation, or transition to a more widely available permanent program.

Staff and other stakeholders should also have an opportunity in future filings to recommend additional eligibility categories or program designs. However, I believe an initially targeted rollout would allow Evergy to determine where distributed batteries provide the greatest value before expanding the program. This would also provide greater assurance that the program produces measurable benefits for the broader customer base.

Q. STAFF RAISES A CONCERN THAT YOU DID NOT PROPOSE A SPECIFIC COST CAP FOR THE LARGE CUSTOMER BATTERY PARTNERSHIP PILOT. WHY DID YOU NOT RECOMMEND ONE?

A. My direct testimony did not include a specific cap for the commercial and industrial battery program because I believe the Company should first evaluate the need and opportunity that may exist among these customers. I recommended that Evergy investigate and report on the feasibility of a utility-owned, customer-hosted battery partnership program, including customer interest, suitable host sites, participation terms, localized grid benefits, and potential benefits to nonparticipating customers. Given the potentially limited number of suitable host sites, I was primarily focused on having the Company establish whether a meaningful and cost-effective opportunity exists before recommending a funding level.

Unlike a standard rebate, the size and cost of this program would depend on Evergy's identified system needs and the availability of appropriate host sites. Not every commercial or industrial customer will have the necessary load profile, available land, electrical infrastructure, or location to host a cost-effective battery system. Evergy must also evaluate whether a proposed installation could improve reliability, accommodate load growth, or defer a transmission or distribution investment.

I agree that any program ultimately proposed for Commission approval should include reasonable cost controls and a defined program cap. However, Evergy should develop that cap after completing the necessary feasibility and system-planning analysis and include it in its next general rate case if the Company determines that this type of program should be proposed.

Q. STAFF RECCOMENDS THAT PROGRAM COSTS BE BORNE BY PARTICIPANTS AND EVERGY'S SHAREHOLDERS. DO YOU AGREE?

A. I agree that participating customers should bear an appropriate portion of program costs, particularly where the benefits are primarily customer-specific. For example, a residential customer may receive backup power and resiliency benefits, while a commercial host may receive enhanced resiliency, a lease payment, or other compensation under a voluntary host agreement.

However, the proposed programs are not intended solely to provide participating customers with access to batteries. They are designed to evaluate batteries as distributed grid resources that may reduce peak demand, improve reliability, accommodate load growth, and defer infrastructure investments. Under the Large Customer Battery Partnership Pilot, Evergy would retain ownership, operational control, dispatch rights, maintenance responsibility, and replacement responsibility. Those systems would therefore be operated as utility infrastructure rather than solely as customer equipment.

If the cost-benefit analysis demonstrates that a targeted battery installation produces measurable savings or reliability benefits for the broader system, it may be appropriate to allocate a portion of the costs to all customers receiving those benefits. Conversely, if the analysis does not demonstrate sufficient system-wide benefits, a larger participant contribution, shareholder responsibility, program modification, or smaller program may be appropriate.

Q. HAS STAFF'S REBUTTAL TESTIMONY CHANGED YOUR RECOMMENDATION?

A. No. Staff's testimony has helped clarify several safeguards that should accompany Evergy's future proposal, but it has not changed my central recommendation. I continue to recommend that the Commission direct Evergy to propose comprehensive customer battery pilots in its next general rate case.

That filing should include cost-benefit analyses, clear learning objectives, reasonable program caps, separate accounting, semiannual reporting, and defined pilot periods or transition plans. It should also preserve Evergy's ability to target batteries where they provide measurable system value and allocate costs according to the benefits received by participants, nonparticipating customers, and the broader electric system. Renew Missouri is also open to further input from Staff regarding how broader eligibility could be incorporated into a subsequent phase or tranche after Evergy has collected sufficient operational and cost-benefit information.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Request of Evergy Metro, Inc. d/b/a Evergy Missouri Metro for Authority to Implement a General Rate Increase for Electric Service	))))	**File No. ER-2026-0143**

AFFIDAVIT OF PHILIP FRACICA

STATE OF MISSOURI)
) ss
COUNTY OF BOONE)

COMES NOW Philip Fracica and on his oath states that he is of lawful age; that he prepared the attached surrebuttal Testimony; and that the same is true and correct to the best of his knowledge and belief.

Further the Affiant sayeth not.

Philip Fracica

Subscribed and sworn before me this 4th day of September, 2026.

Notary Public

My Commission expires: 8-16-2027

JAMES M. OWEN
Notary Public - Notary Seal
STATE OF MISSOURI
Boone County
My Commission Expires: August 16, 2027
Commission #15637358

1