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Rebuttal Testimony of Katie R. McDonald
Case No. ER-2026-0143

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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2026-0143

REBUTTAL TESTIMONY

OF

KATIE R. MCDONALD

ON BEHALF OF

EVERGY MISSOURI METRO

Kansas City, Missouri
August 2026

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REBUTTAL TESTIMONY

OF

KATIE R. MCDONALD

Case No. ER-2026-0143

I. INTRODUCTION

Q: Please state your name and business address.

A: My name is Katie R. McDonald. My business address is 1200 Main, Kansas City, Missouri 64105.

Q: Are you the same Katie McDonald that filed direct testimony in this case on February 6, 2026?

A: Yes.

Q: On whose behalf are you testifying?

A: I am testifying on behalf of Evergy Missouri Metro ("EMM" or "Company").

Q: What is the purpose of your rebuttal testimony?

A: The purpose of my testimony is to respond to the direct testimony filed by Renew Missouri witness Katherine Wyszkowski related to her proposals to have the Commission add $347,327 to the Company's revenue requirement to implement Green Button Connect My Data and add $100,000 to the revenue requirement for the Company to perform a study to understand the costs and benefits of participating in a centralized data hub. I will also address recommendations of Dr. Geoff Marke related to income-eligible programs. In particular, I will provide recommendations regarding the funding levels for the Rehousing Program, Critical Medical Needs, and Income Eligible Weatherization Program.

Q: Please explain your understanding of Ms. Wyszkowski's proposal to have Evergy implement Green Button Connect My Data.

A: As I understand her direct testimony on page 5, she recommends that the Commission add $347,327 to Evergy's revenue requirement in order for the Company to offer Green Button Connect. According to Ms. Wyszkowski, these funds would help customers better manage their electric bills, audit their bills for accuracy, and ensure that their rate is economically optimal. She indicates that Green Button Connect would also allow aggregations of demand-side resources to participate in markets organized by the Southwest Power Pool ("SPP") by providing secure, electronic access to customer data that is required by SPP.

Q: Does Evergy currently have available the Green Button Connect functionality?

A: No. Evergy does not currently offer Green Button Connect My Data. However, the Company does provide customers with access to Green Button Download My Data functionality, pursuant to a previous Evergy rate case order.

Q: Please explain the history of Evergy's Green Button Download functionality efforts.

A: In EMM's 2018 rate case, File No. ER-2018-0145, the Company entered into a Stipulation and Agreement in which it agreed to implement the Green Button platform no later than the second half of 2020. The deployment of this platform required considerable planning, particularly since the deployment included integration with protected Company data systems and account portal applications managed in part by third party technology providers. Given the structure of the account portal applications, the Green Button Download My Data deployment took two paths, one for residential and smaller commercial & industrial customers, and one for large commercial & industrial customers. Access to data through the Green Button Download My Data standard was enabled in Fall 2020 for

residential and smaller commercial & industrial customers, accounting for approximately 96% of Evergy customers, and Fall 2024 for large commercial & industrial customers, approximately 4% of customers.

Q: What is the current status of the Green Button Download My Data capability at Evergy?

A: EMM has fulfilled its commitment to implement the Green Button Download My Data standard, enabling access for residential and smaller commercial and industrial customers in Fall 2020, and larger commercial and industrial customers in Fall 2024.

Q: What is your understanding of the differences between Evergy's current Green Button Download capability and the Green Button Connect capability being advocated by Ms. Wyszkowski?

A: The primary difference between Green Button Download and Green Button Connect is how customer energy data is transferred to a third party. With Green Button Download, the customer must first download their energy data in the Green Button standard format and then provide that data to the third party. With Green Button Connect, once the customer authorizes access, the third party can securely obtain the customer's authorized energy data directly from the utility, eliminating the need for the customer to act as an intermediary in the transfer process.

Q: Can third parties access customer-authorized energy data in the Green Button standard format today?

A: Yes. Because Evergy has implemented Green Button Download for all customers, customers can download their energy data in the Green Button standard format and provide that data directly to any third party they choose. As a result, third parties can access

customer-authorized energy data in the Green Button standard format today through customer-directed sharing. This provides for an important level of customer control and data protection in the sharing of and access to their specific data.

Q: Please describe the current AMI data that is available for customers to view, download, and share directly with third parties under Evergy's existing programs and portals.

A: Residential and small-to-medium business customers can access their energy usage through the Evergy My Account portal via the Account Summary and Usage & Cost Trends pages. Residential customers may also access their usage data through the Evergy Mobile App by navigating to the Usage tab and selecting the Usage & Cost Trends page.

Residential customers can view energy usage at hourly intervals, while small-to-medium business customers have access to more granular 15-minute interval data. Both customer groups can also view daily and billed monthly summaries.

From these pages, customers can download their 15-minute interval usage data in XML format using the Green Button Download feature. In addition, customers have the option to download their data in a more user-friendly CSV format, which is generally intended to support customer-specific analysis.

Large Commercial and Industrial customers access their account information through a separate portal, Account Link Advantage (ALA). Within ALA, customers can view energy usage at monthly, daily, hourly, and 15-minute intervals via the Energy Usage page. The Green Button Download functionality, accessible both from the main navigation pane and the Energy Usage page, allows these customers to download 15-minute interval data in XML format.

ALA also provides customers with the option to download usage data in CSV format. Similar to the My Account portal, this CSV format is designed primarily for customer analysis.

Q: Has Evergy evaluated the costs, benefits, or feasibility of providing Green Button Connect My Data?

A: Yes. Most recently in 2024, Evergy conducted an evaluation of the costs, benefits, and technical feasibility of offering Green Button Connect My Data functionality to all customers. **[redacted]**

At the time of evaluation in 2024, preliminary cost estimates indicated approximately **[redacted]** in implementation costs through Oracle Opower, along with an additional **[redacted]** in setup costs from UtilityAPI, for a total third-party implementation expense of **[redacted]**. Ongoing licensing costs from UtilityAPI were estimated at approximately **[redacted]** over a three-year period. These costs were structured to cover all Evergy customers across both Kansas and Missouri and were inclusive of implementation and a three-year licensing term, based on vendor estimates obtained in 2024. These cost estimates do not include the Company's internal costs associated with implementing, operating, maintaining, or administering the technical capability. Implementation and licensing costs would be allocated proportionately across

each jurisdiction. It is important to note that if we were to implement for only one state or only one jurisdiction, the implementation would become more complex and more expensive.

Utilization assumptions were informed by observed customer behavior related to the existing Green Button Download My Data functionality, which indicates that approximately 3% of unique residential customers in Missouri today have downloaded their data through this capability.

Q: What was the takeaway based on this evaluation?

A: Based on these factors, Evergy determined that the projected costs were not justified given the expected level of customer adoption with only 3% of residential customers using Green Button Download My Data today. While Green Button Connect My Data could provide value to certain customer segments, particularly larger or more data-intensive (large C&I) customers, the associated costs of a few would be borne by the entire customer base.

Q: Has Evergy's evaluation of the Green Button Connect My Data capability changed since 2024?

A: No, it has not. Based on Evergy's current evaluation, including anticipated customer demand and projected utilization of the functionality, the Company does not believe that Green Button Connect My Data is a necessary or cost-effective capability for its customers at this time. In reaching that conclusion, the Company also recognizes that customers can already share their energy data in the Green Button standard format with third parties through Evergy's existing Green Button Download My Data capability. As a result, authorized third parties can access customer energy data in the Green Button standard

format today, albeit through a customer-directed process rather than a direct utility-to-third-party connection.

Q: Please explain your understanding of Ms. Wyszkowski's proposal that Evergy Missouri Metro conduct a study evaluating the costs and benefits of participating in a centralized data hub, through which customer-authorized third parties could obtain customer information from a single source across a state or region. Please also explain your position on that proposal.

A: On page 27, Ms. Wykszkowski states: "I further recommend that Evergy should add $100,000 to the revenue requirement in order to study the costs and benefits of participating in a centralized "data hub." A data hub means that a customer-authorized third party can receive information from a single place across a state or a region, regardless of which utility is providing the underlying data."

The Company's understanding of Ms. Wykszkowski's proposal is that it contemplates a statewide or regional Green Button Connect My Data solution consisting of a single platform or customer interface through which customers could authorize third-party access to their energy data. The Company bases this understanding on her reference to a "single point of entry" for customer authorization.

While the concept of a regional platform may appear attractive in theory, the Company does not believe it is the most practical or cost-effective approach at this time. Utilities throughout the region are at different stages of their customer data access journeys, including implementation of Green Button Download and Green Button Connect My Data, and have adopted, or are evaluating, different technologies, vendors, architectures, and implementation timelines. Developing a single regional solution would require significant

coordination among multiple utilities and stakeholders, alignment on governance and operational requirements, agreement on cost allocation, and consensus regarding cybersecurity, privacy, and data management standards.

In addition, a regional platform could require participating utilities to modify or replace existing systems, and implementation plans to conform to a common architecture, potentially resulting in duplicative expenditures and stranded investments.

As a result, if the Commission were to order the Company to implement the Green Button Connect My Data capability, pursuing a statewide or regional Green Button Connect My Data platform architecture would introduce additional complexity, implementation risk, and uncertainty regarding costs and timelines.

Ms. Wyszkowski references data hubs in Texas and New York. In both instances, the utilities are not responsible for leading and implementing the data hub. There are third parties responsible for sponsoring, owning, and overseeing the development and operation of a state-wide data hub. For that reason, it would not be prudent for Evergy customers to fund a regional data hub study.

Accordingly, the Company believes that Green Button Connect My Data implementation decisions should be evaluated based on the needs of each company's customers and each company’s existing systems, operational requirements, costs, and expected benefits, rather than on a regional framework.

For these same reasons, the Company does not believe it would be necessary, appropriate, or a prudent use of ratepayer funds to undertake a separate study of the costs and benefits associated with the type of regional data hub contemplated by Ms. Wyszkowski. Given the Company's concerns regarding the feasibility, governance, costs,

and coordination required to establish such a platform, the Company does not support the requested study and does not believe that the costs of the study should be borne by the customers of a single Evergy affiliate.

Q: On July 14, 2026, Ms. Wykszkowski filed additional direct testimony addressing tariff and policy issues related to Green Button Connect My Data. Does Evergy have a response to this testimony?

A: I would reiterate that Evergy does not believe the Commission should adopt Renew Missouri's recommendation to require implementation of Green Button Connect My Data in this proceeding. Further, if the Commission were to direct Evergy to implement Green Button Connect My Data, the Company would not recommend prescribing the specific technical design, architecture, or implementation approach through a tariff. Evergy believes those decisions are more appropriately addressed through the Company's technology and operational management processes, subject to the Commission's existing oversight authority, rather than through detailed tariff provisions. This approach preserves the flexibility necessary to develop and maintain a solution that is efficient, secure, and responsive to evolving technology and customer needs.

II. INCOME ELIGBILE PROGRAMS

Q: On pages 55-56, Dr. Geoff Marke on behalf of the Office of the Public Counsel discusses his recommendations regarding Evergy's income-eligible programs. Do you have a response to his recommendations?

A: Yes. Evergy agrees with Dr. Marke's recommendations to maintain the current funding levels for both EMM's Rehousing Program and Economic Relief Program. We believe EMM's Economic Relief Program has been effective and continues to help customers

manage their utility payments and remain current on their Evergy account. EMM customers falling at or below 200% of the federal poverty guideline are eligible to apply. Evergy already conducts additional outreach to EMM seniors on fixed income, living in income-eligible housing facilities.

EMM's Rehousing Program remains a new program and is in the third year of a three-year pilot. Currently Evergy partners with the Housing Authority of Kansas City (HAKC) to enroll low-income EMM customers in the program who are entering stable housing. Evergy conducts additional direct outreach to HAKC's senior facilities to help seniors, already in stable housing, remain in their current home. Additionally, EMM's Rehousing Program recently expanded to include domestic violence shelters, which focuses on helping survivors of domestic violence enter into stable housing.

Q: What is your response to Dr. Marke's recommendations to increase funding for the Critical Medical Needs Program and the Income Eligible Weatherization Program which would be funded 50/50 between the Company's shareholders and our customers?

A: Evergy does not believe it is necessary or appropriate to increase the funding of the Critical Medical Needs Program by $2 million or for the funding level of the Income Eligible Weatherization Program to be set at $2 million at this time. The Critical Medical Needs Program is a relatively new pilot program, and we need more time to evaluate its effectiveness and future funding levels.

With regard to the Income Eligible Weatherization Program, Evergy has two initiatives that are showing effectiveness but don't warrant increased funding at this time. EMM currently funds $573,888 per year for its Income-eligible Weatherization Program, which

is funded through base rates. Historically, the program struggled to spend the entire funding amount. However, in recent years, Evergy has expended the budget and believes the current funding level is appropriate. Dr. Marke indicated that additional funds would lessen the amount of homes being 'passed over' for weatherization funding. However, under the portfolio of MEEIA programs, Evergy has a separate program in place and designed for this purpose in which we support the community action agency partners and partner with Bridging the Gap to perform Weatherization Ready efforts to lessen the amount of homes being 'passed over' or deferred when it comes to receiving weatherization dollars. Evergy intends to file a request this year to continue this MEEIA program beyond 2026. Together Evergy believes both programs are at the appropriate funding levels.

Q: What are Dr. Marke's other related recommendations?

A: Dr. Marke also proposes that EMM spend up to $150,000 to study energy burden and create a new low-income rate or waive customer charges for residential low-income customers.

Q: Please summarize your testimony.

A: Evergy believes it is premature for the Commission to consider these recommendations while the Affordability Workshop is actively considering such issues. Evergy is encouraged by the interactions and dialogue that parties have had in the Affordability Workshop and anticipates advancing enhanced low-income offerings upon conclusion of the workshops and an opportunity to develop a recommendation informed by the stakeholders' work and the Commission's report associated with the docket.

Q: Does that conclude your testimony?

A: Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

AFFIDAVIT OF KATIE MCDONALD

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Katie McDonald, being first duly sworn on his oath, states:

1. My name is Katie McDonald. I work in Kansas City, Missouri and I am employed by Evergy Metro, Inc. as Vice President, Public Affairs.

2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of Evergy Missouri Metro consisting of eleven (11) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

Katie R. McDonald

Subscribed and sworn before me this 11th day of August 2026.

Notary Public

My commission expires: April 26, 2029

ANTHONY R WESTENKIRCHNER
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 26, 2029
PLATTE COUNTY
COMMISSION #17279952

Evergy Metro, Inc. d/b/a Evergy Missouri Metro

Docket No.: ER-2026-0143
Date: August 11, 2026

CONFIDENTIAL INFORMATION

The following information is provided to the Missouri Public Service Commission under CONFIDENTIAL SEAL:

Document/Page	Reason for Confidentiality from List Below
McDonald Rebuttal p. 5, lns. 8-13; 15-16; and 17-18	3, 4, and 6

Rationale for the "confidential" designation pursuant to 20 CSR 4240-2.135 is documented below:

1. Customer-specific information;

2. Employee-sensitive personnel information;

3. Marketing analysis or other market-specific information relating to services offered in competition with others;

4. Marketing analysis or other market-specific information relating to goods or services purchased or acquired for use by a company in providing services to customers;

5. Reports, work papers, or other documentation related to work produced by internal or external auditors, consultants, or attorneys, except that total amounts billed by each external auditor, consultant, or attorney for services related to general rate proceedings shall always be public;

6. Strategies employed, to be employed, or under consideration in contract negotiations;

7. Relating to the security of a company's facilities; or

8. Concerning trade secrets, as defined in section 417.453, RSMo.

9. Other (specify) _____.

Should any party challenge the Company's assertion of confidentiality with respect to the above information, the Company reserves the right to supplement the rationale contained herein with additional factual or legal information.