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MISSOURI PUBLIC SERVICE COMMISSION

ER-2026-0143

DIRECT TESTIMONY

OF

PHILIP A. FRACICA

ON BEHALF OF

RENEW MISSOURI ADVOCATES

June 30, 2026

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I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Philip A. Fracica. My business address is 501 Fay Street Suite 206, Columbia, Missouri, 65201.

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

A. I am employed by Renew Missouri Advocates d/b/a Renew Missouri ("Renew Missouri") as Director of Programs.

Q. On whose behalf are you testifying?

A. I am testifying on behalf of Renew Missouri.

Q. What are your responsibilities?

A. My current responsibilities are focused on clean energy policy advocacy with municipal utilities and rural electric cooperatives, researching utility clean energy programs, and advocating for the expansion of energy efficiency programs with a focus on low-income multifamily customers.

Q. Please describe your educational background and work experience.

A. My educational experience consists of a Bachelor of Science in Business Administration with an Emphasis in Finance from the University of Missouri. I am currently an MBA Candidate at the University of Missouri and am working towards completing my graduate degree this Fall. I started working at Renew Missouri in May 2014 as an intern and began working full-time with the organization in 2015. Over the last eleven years, I have submitted testimony for Renew Missouri in multiple rate cases and have primarily focused on low-income programs including the PAYS® program and expanding solar program offerings to be more equitable. Outside of my experience writing testimony in cases I have been a member of the Missouri Weatherization Policy Advisory Council ("MWPAC") over the last six years to help provide input on the state's administration of federal funding for WAP and LIHEAP programs.

In 2019, I was appointed to Columbia Missouri's Integrated Electric Resource and Master Plan Task Force to help the city and its municipal utility, Columbia Water & Light, draft the Integrated Resource Plan ("IRP") for the city. Since 2023, I have been appointed and reappointed to serve on the City's Water and Light Advisory Board, providing input to City Council and Staff. This experience has further deepened my knowledge and understanding of long-term utility planning, operations, capacity requirements, NERC and FERC requirements, and many other key aspects of daily utility operations.

II. PURPOSE AND SUMMARY OF TESTIMONY

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to:

1. Recommend expansion of Evergy's Solar Subscription Program based upon demonstrated customer demand.
2. Recommend continuation of a dedicated Income-Eligible Solar Subscription offering through a right-sized allocation.
3. Discuss opportunities to coordinate future community solar offerings with existing federal and state energy assistance programs.

III. EVALUATION OF EVERGY'S SOLAR SUBSCRIPTION PROGRAM

Q. How would you describe Evergy's Solar Subscription Program?

A. Evergy's Solar Subscription Program is a voluntary renewable energy program that allows eligible residential and non-residential customers to subscribe to the output of a utility-owned solar facility without installing solar equipment at their home or business. Customers purchase subscriptions in 500-watt Solar Blocks, and the energy produced by their subscribed share of the

solar resource is applied as a bill credit to offset an equivalent amount of the customer's monthly energy consumption under their standard retail rate schedule.

The program is available on a voluntary, first-come, first-served basis to eligible customers receiving retail electric service from Evergy. Customers whose desired subscription level cannot be accommodated because all available Solar Blocks have been subscribed are placed on a waiting list and are offered the opportunity to participate as additional capacity becomes available through subscription cancellations or future program expansions. Residential customers may subscribe to enough Solar Blocks to offset up to 50 percent of their annual energy usage, while non-residential customers may subscribe to offset up to 100 percent of their annual energy usage. In addition to the standard Solar Subscription Program, Evergy also offers an Income-Eligible Solar Subscription Program that provides qualifying low-income customers an opportunity to participate in community solar. Together, these programs expand access to renewable energy for customers who may not own their home, have a suitable roof for rooftop solar, or wish to make the upfront investment required for a customer-owned solar installation.

Q. Has Evergy anticipated expanding the Solar Subscription Program in the future?

A. Yes. In a 2023 news release[1] regarding the Solar Subscription Program, Evergy stated, "*In the future, the 4 MW will transition to the future needs of Missouri West and Missouri Metro Solar Subscription participants to meet demand for future customer enrollment in the program.*" This statement demonstrates that the Company anticipated future program growth as customer participation increased.

Based on the information currently available, this anticipated transition or expansion has not occurred. Instead, Evergy has reported that the standard Solar Subscription Program is fully

[1] Evergy Newsroom (2023). *Evergy builds largest Solar Subscription installation in Missouri*. https://newsroom.evergy.com/2023-03-06-Evergy-builds-largest-Solar-Subscription-installation-in-Missouri

subscribed in both Missouri jurisdictions while maintaining a waiting list of customers seeking to participate. These results suggest that customer demand has now reached the point where the Company should revisit the expansion it previously anticipated.

Q. Based on the Company's reported enrollment, how would you evaluate the success of the Solar Subscription Program?

A. I would conclude that the standard Solar Subscription Program has been successful in achieving customer participation. According to Evergy's 2025 Annual Program Report,[2] the standard Solar Subscription Program is fully subscribed in both Missouri jurisdictions, with enrollment reaching 100 percent of the available capacity. In addition, the Company maintains a waiting list of 112 customers representing 714 subscription shares, including 28 customers (142 shares) in Missouri Metro and 84 customers (572 shares) in Missouri West. These participation results demonstrate that customer demand currently exceeds the subscription capacity available under the existing program.

In my opinion, the program has progressed beyond the experimental phase contemplated when the tariff was first approved. The combination of full subscription and a sustained waiting list demonstrates that community solar has become an established voluntary customer offering with demonstrated customer demand. Accordingly, the available evidence indicates that it is appropriate for the Commission and the Company to evaluate the next phase of the program, including expanding subscription opportunities to better serve customers who have expressed an interest in participating.

[2] *2025 annual program report: Solar Subscription Rider (Schedule SSP)* In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service and In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement a General Rate Increase for Electric Service Docket Nos. ER-2018-0145 and ER-2018-0146, filed March 10, 2026.

Q. What conclusions do you draw from these participation results?

A. I draw three primary conclusions from the Company's reported enrollment data.

First, the Solar Subscription Program has proven successful in generating customer participation. The standard program has reached full subscription in both Missouri jurisdictions and continues to maintain a waiting list of customers seeking to participate. These results demonstrate sustained customer demand and indicate that community solar has become an established voluntary customer offering rather than an experimental pilot.

Second, Evergy has previously recognized that additional community solar capacity may be needed as customer participation grows. Based on the information available, it does not appear that this anticipated transition has occurred despite the existence of fully subscribed programs and an established waiting list.

Third, maintaining lengthy waiting lists is not an effective long-term strategy for a voluntary customer program that has demonstrated sustained demand. Customers who have expressed a willingness to participate should have a reasonable opportunity to enroll without waiting for subscription cancellations or an indefinite future expansion.

Accordingly, I recommend that Evergy first utilize, to the extent practicable, the additional 4 MW the Company previously identified for future Solar Subscription Program enrollment. If that capacity is no longer available or cannot be transitioned to customer subscriptions within a reasonable timeframe, Evergy should seek Commission approval to expand the Solar Subscription Program through the development of additional community solar resources.

Therefore, I recommend that any future expansion include at least 4.5 MW of additional community solar capacity, with 4.0 MW made available for general subscribers and 500 kW reserved for an expanded Income-Eligible Solar Subscription offering. Any portion of the reserved

low-income capacity that remains unsubscribed after a reasonable enrollment period should automatically become available to the general subscriber pool to ensure that all available generating capacity is fully utilized.

IV. EVALUATION OF EVERGY'S INCOME-ELIGIBLE SOLAR SUBSCRIPTION PROGRAM

Q. How has the income-eligible offering performed?

A. The Income-Eligible Solar Subscription Program has demonstrated meaningful customer participation, although enrollment has been lower than the standard Solar Subscription Program. According to Evergy's 2025 Annual Program Report[3], the program included 29 income-qualified customers representing 218 subscription shares in Missouri Metro and 20 income-qualified customers representing 154 subscription shares in Missouri West at the end of 2025. These participation levels demonstrate that there is meaningful interest among income-qualified customers in participating in community solar.

Q. Does this indicate that the low-income offering should be eliminated?

A. No. The enrollment data do not support eliminating the dedicated low-income offering. Rather, they support refining the program based on the Company's operational experience.

The lower participation levels are not surprising given that the dedicated income-eligible portion of the program was limited in size and that Missouri has not yet integrated community solar with existing federal and state energy assistance programs that could substantially improve customer savings. As I discuss later in my testimony, opportunities may exist to leverage programs such as the Weatherization Assistance Program, LIHEAP, or other future funding sources to reduce customer costs and increase participation.

[3] Id.

Based on the Company's reported enrollment, I recommend that Evergy continue offering a dedicated low-income community solar option but reduce the reserved allocation from 1 MW to 500 kW. This recommendation better aligns the program with demonstrated participation while preserving equitable access for income-qualified customers. Any reserved low-income capacity that remains unsubscribed after a reasonable enrollment period should automatically become available to general subscribers to ensure that all available community solar capacity is fully utilized.

V. PROGRAM EXPANSION RECOMMENDATIONS

Q. Why are you proposing a smaller program size for expansion?

A. The Company was able to fully subscribe 6 MW out of the initial 10 MW of the Hawthorn solar resource, but given the existing wait list, it is clear there is still unmet interest in this program. I recommend that the Company consider expanding this offering, while sizing the expansion to demonstrated customer demand so that excess generation capacity is not rolled into the general rate base, as occurred under the existing Solar Subscription Program. Accordingly, I would recommend that the Commission approve an appropriately sized expansion of the program while maintaining a dedicated allocation for income-eligible customers.

Q. How should Evergy address unsubscribed capacity?

A. After a defined enrollment period, automatically make unused low-income subscriptions available to all customers.

Q. When could it make sense for Evergy to grow the Income-Eligible Solar Subscription Program at a larger scale?

A. Given current market conditions and uncertainty regarding future federal incentives for solar, short-term deployment is likely to be more challenging. As a result, a large expansion of the Income-Eligible Solar Subscription Program would be most appropriate if Solar For All funding is restored and made available to the entities that previously planned to serve Missouri's community solar needs.

VI. FUTURE FUNDING OPPORTUNITIES

Q. Could future funding opportunities improve participation and increase customer savings under the Income-Eligible Solar Subscription Program?

A. Yes. While enrollment in Evergy's Income-Eligible Solar Subscription Program has been lower than enrollment in the standard Solar Subscription Program, in my opinion the current participation levels do not represent the program's long-term potential. To date, Missouri has not fully integrated the Income-Eligible Solar Subscription Program with several significant federal and state funding opportunities that could substantially improve customer savings and, as a result, increase participation among income-qualified households.

An opportunity exists through the Low-Income Home Energy Assistance Program ("LIHEAP"). Although Missouri has not yet authorized the use of LIHEAP funding in conjunction with community solar subscriptions, recent federal initiatives demonstrate that this type of coordination is becoming increasingly feasible.

In partnership with the U.S. Department of Energy ("DOE") and the U.S. Department of Health and Human Services ("HHS"), DOE has developed the Clean Energy Connector[4], a national platform that allows state LIHEAP agencies to connect income-qualified households with available community solar subscriptions. The program is currently operating as a pilot in several

[4] U.S. Department of Energy Clean Energy Connector webpage-U.S. Department of Energy. (n.d.). Clean Energy Connector. https://www.energy.gov/cmei/systems/clean-energy-connector

states and is intended to reduce customer acquisition costs, streamline enrollment, and ensure that low-income households receive meaningful electricity bill savings through community solar participation. DOE has also indicated that additional states may participate in future phases if they maintain an active low-income community solar program, receive support from both their state community solar and LIHEAP administering agencies, and have community solar capacity available for enrollment.

Although Missouri was not selected as one of the initial pilot states, the Clean Energy Connector demonstrates an emerging federal framework for coordinating LIHEAP and community solar programs. If Missouri elects to participate in a future phase of the Connector or adopts a similar administrative model, Evergy's Income-Eligible Solar Subscription Program would already be positioned to leverage those opportunities.

A second potential funding opportunity is Missouri's proposed Solar for All program[5]. Missouri's Solar for All application envisioned utility-owned community solar as a primary strategy for expanding renewable energy access to low-income households and specifically anticipated leveraging community solar, weatherization assistance, and other energy assistance programs to maximize household savings. The proposal also contemplated using forgivable loans and other financial assistance to ensure participating households receive meaningful utility bill savings while encouraging additional utility-owned community solar development.

Although the future of Missouri's Solar for All funding remains uncertain due to ongoing litigation, it nevertheless illustrates the type of complementary funding that could substantially improve

[5] Missouri Solar for All Grant Program Narrative. Environmental Improvement and Energy Resources Authority. (2023, October 12). Missouri Solar for All grant program narrative. https://eiera.mo.gov/wp-content/uploads/sites/11/2023/10/Missouri-Solar-for-All-Grant-Program-Narrative-2.pdf

participation in Evergy's Income-Eligible Solar Subscription Program if it ultimately becomes available.

Importantly, none of these opportunities require Evergy to fundamentally redesign its Solar Subscription Program. Rather, they build upon the existing program by leveraging external federal and state resources to increase customer savings, improve participation, and reduce customer energy burdens.

For these reasons, I recommend that Evergy maintain a dedicated Income-Eligible Solar Subscription Program as part of any future community solar expansion. Although current enrollment has been more limited than the standard subscription offering, I do not believe the existing participation levels reflect the program's full long-term potential. Missouri has already established a strong foundation of low-income energy assistance through programs such as weatherization, energy efficiency, and bill assistance. As federal initiatives continue encouraging greater coordination among these programs and community solar offerings, there is an opportunity to build a more integrated approach to reducing household energy burdens. Future opportunities such as the Clean Energy Connector and, if available, Solar for All could further strengthen these connections while substantially enhancing customer savings. Over time, better coordination among weatherization, energy efficiency, bill assistance, and community solar programs could create a more comprehensive approach to reducing household energy burdens than any single program can provide independently.

Maintaining a right-sized dedicated low-income community solar offering will position Evergy to capitalize on these evolving funding opportunities while expanding access to renewable energy for income-qualified customers. This approach allows the Company to build upon an existing

customer program, leverage external funding sources where available, and increase customer participation without requiring additional costs to be shared by non-participating ratepayers.

VII. CONCLUSION

Q. Please summarize your recommendations.

A. Based on the Company's reported program performance and the information presented throughout my testimony, I recommend that the Commission approve modifications that build upon the demonstrated success of Evergy's Solar Subscription Program while positioning the program for future growth, and prepare an evaluation of expansion of the Solar Subscription Program to be filed with Evergy's next general rate case.

Specifically, I recommend that the evaluation analyzes:

1. Evergy utilizing the additional 4 MW of community solar capacity previously identified for future Solar Subscription Program enrollment, to the extent practicable. If that capacity is no longer available or cannot be transitioned to customer subscriptions within a reasonable timeframe, Evergy should seek Commission approval to expand the Solar Subscription Program through the development of additional community solar resources.
2. An expansion of at least 4.5 MW of additional community solar capacity, with approximately 4 MW made available for general subscribers and 500 kW reserved for an Income-Eligible Solar Subscription Program.
3. Continuing to offer a dedicated Income-Eligible Solar Subscription Program while resizing the reserved capacity to better reflect demonstrated customer participation and allowing any unsubscribed low-income capacity to become available to the general subscriber pool after a reasonable enrollment period.

4. Continue designing the Solar Subscription Program in a manner that allows it to leverage future federal and state funding opportunities, including potential coordination with LIHEAP, the Clean Energy Connector, and, if ultimately available, Missouri's Solar for All program.

These recommendations reflect the Company's own experience administering the Solar Subscription Program. The standard program has demonstrated sustained customer demand through full subscription and an established waiting list, while the Income-Eligible Solar Subscription Program has demonstrated meaningful participation that can be strengthened through a right-sized program design and future coordination with complementary funding opportunities. Together, these recommendations build upon an existing successful customer offering, expand customer choice, preserve opportunities for income-qualified households to participate in community solar, and do so in a manner that minimizes program risk while avoiding unnecessary costs to non-participating customers.

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 Direct 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 29th day of June, 2026.

Notary Public - James M. Owen

My Commission expires: 8-16-27

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