

**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 ) File No. ER-2022-0129  
Authority to Implement a General Rate )  
Increase for Electric Service )

In the Matter of Evergy Missouri West, Inc. )  
d/b/a Evergy Missouri West’s Request for ) File No. ER-2022-0130  
Authority to Implement a General Rate )  
Increase for Electric Service )

**Renew Missouri’s Amended Statement of Positions**

COMES NOW Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”) and for its *Amended Statement of Positions* states:

At the time of Renew Missouri’s initial *Statement of Positions*, the parties were engaged in settlement discussions aimed at resolving several of the issues relevant to Renew Missouri’s positions. These discussions have since ceased, leaving more issues to be argued at hearing; Renew Missouri’s positions have changed accordingly. Renew Missouri seeks leave to file the below *Amended Statement of Positions*, pursuant to 20 CSR 4240-2.080(18). No party should be prejudiced by Renew Missouri’s amendment.

**Issue XXVIII: Rate Design/Class Cost of Service**

*Sub-issue D.1: What is the appropriate residential customer charge?*

Position: Renew Missouri opposes any increase to the residential customer charge.

*Sub-issue F: Should the Company’s proposed Time of Use rate schedules be implemented on an opt-in basis?*

Position: Renew Missouri supports the position as articulated by Chargepoint, Inc. in its August 22, 2022 Statement of Position.

*Sub-issue H: Should the Commission order the Company to conduct a comprehensive study to determine how to offer Time of Use rates to all customers, including customers with net metered solar and other forms of distributed generation?*

Position: Yes, the Commission should order the Company to conduct a comprehensive study to determine how to offer Time of Use rates to customers with net metered solar and other forms of distributed generation. The Commission should order Evergy to deliver the results of its study by its next rate case or triennial IRP.

## **Issue XX: Electrification Tariffs**

*Sub-issue A: Should Evergy's requested EV charging rates, Business EV Charging Service (BEVCS), and Electric Transit Service rate be promulgated? With or without modification?*

Position: Renew Missouri supports the position as articulated by Chargepoint, Inc. in its August 22, 2022 Statement of Position.

*Sub-issue B: Should Evergy's proposed Commercial EV Charger Rebates be approved? If yes, should there be any conditions placed on how the tariff is designed?*

Position: Renew Missouri supports the position as articulated by Chargepoint, Inc. in its August 22, 2022 Statement of Position.

## **Issue XXIII: Pilot Programs**

*Sub-issue A: Should the Commission approve the changes to the Solar Subscription Pilot tariff? Which changes should be denied? Which changes should be accepted?*

Position: Yes. The Commission should approve the changes as proposed by the Company in the Direct Testimony of Bradley Lutz.

*Sub-issue B: Should the Commission approve the Residential Battery Energy Storage Pilot tariff? If yes, what conditions should the Commission order related to that study? If no, should the Commission order Evergy to conduct a meta- study or literature review as an alternative?*

Position: Yes. The Commission should approve the Residential Battery Energy Storage Pilot as proposed by the Company in the Direct Testimony of Kimberly Winslow.

*Sub-issue E: Should the Commission approve the Low-Income Solar Subscription Pilot Program as proposed by the Company, through the 1 MWac portion of the 10 MWac solar resource that is to be built? If so, should the Commission order the shareholder cost-sharing mechanism for unsubscribed portions of the solar resource with a 90% cost burden for shareholders as proposed by OPC? If so, should the Commission order the Company to modify it as proposed by Renew Missouri? If yes, what other conditions or modifications should the Commission order for the program?*

Position: Yes. The Commission should approve the Low-Income Solar Subscription Pilot Program. However, the Commission should order that as part of the Low-Income Solar Subscription Pilot (“LI SSP”), no subscribing residential customer shall, at any time, pay more than the retail rate for power. In addition, the Commission should order the Company to commit to lowering the subscription cost for the LI SSP if and when it proposes an expansion to the LI SSP. Finally, the Commission should order the Company to work with the Missouri Division of Energy, along with Renew Missouri and other interested stakeholders, to pursue opportunities to lower the LI SSP subscription cost through the use of outside funds, which may include: 1) seeking grant(s) under the Federal Department of Energy’s Sustainable Energy Resources for Consumers (“SERC”) and/or Community Scale Pilot Program (“CSPP”) funds as part of the annual Federal Weatherization appropriations; and 2) modifying the State Weatherization Plan to allow for utility contributions to the Low-Income Weatherization Assistance Program (“LIWAP”) program to be used to subsidize a utility company’s low income community solar.

WHEREFORE, Renew Missouri respectfully submits its *Amended Statement of Positions*.

Respectfully,

**/s/ Alissa Greenwald**

Alissa Greenwald, Mo. Bar No. 73727

P.O. Box 413071

Kansas City, MO 64141

T: (913) 302-5567

alissa@renewmo.org

**/s/ Andrew Linhares**

Andrew Linhares, Mo. Bar No. 63973

3115 Grand Blvd, Suite 600

St. Louis, MO 63118

T: (314) 471-9973

andrew@renewmo.org

**Attorneys for Renew Missouri**

**Certificate of Service**

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 30<sup>th</sup> day of August, 2022.

**/s/ Alissa Greenwald**