

**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 Position Statements**

COMES NOW Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”) and respectfully files its Position Statements. Renew Missouri takes no position on any issue in the Joint List of Issues not addressed in this Position Statement, but reserves the right to do so as additional evidence is presented to the Commission.

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

*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 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 Renewable Energy Battery 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 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 as proposed by the Company. However, the Commission should direct the Company to work with Renew Missouri, the Office of Public Counsel, and other interested parties to develop a marketing and outreach approach that leverages current utility assistance, energy efficiency, and weatherization programs to target customers with the most need. In addition, Renew Missouri believes that the program's rate should be subject to future modification for current participants if the program expands and achieves a lower overall cost to the Company.

WHEREFORE, Renew Missouri respectfully submits its Position Statements.

Respectfully,

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Certificate of Service

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 22<sup>nd</sup> day of August 2022:

**/s/ Alissa Greenwald**