

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Kansas City Power & Light)
Company’s Notice of Intent to File an) File No. EO-2019-0132
Application for Authority to Establish a Demand-)
Side Programs Investment Mechanism)

In the Matter of KCP&L Greater Missouri)
Operations Company’s Notice of Intent to File an) File No. EO-2019-0133
Application for Authority to Establish a Demand-)
Side Programs Investment Mechanism)

JOINT RESPONSE TO ORDER DIRECTING RESPONSES

COME NOW Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”)¹ (collectively, “Evergy” or the “Company”), the Staff of the Missouri Public Service Commission (“Staff”), the Office of the Public Counsel (“OPC”), and Renew Missouri Advocates d/b/a Renew Missouri (“Renew MO”) (collectively, “Signatories”) by and through their respective counsel, and for their *Joint Response* (“Response”) to the Missouri Public Service Commission’s (“Commission”) *Order Suspending Tariff Sheets and Directing Response* (“Order”) issued September 9, 2021, state as follows:

1. The PAYS[®] Program applies a tier 4 close out fee of \$490 to the participant’s total job cost. Close out fee services include remote real time contractor trouble shooting support, remote and on site quality control inspections, manual review of geo-coded and time-stamped post upgrade photos, Pearl Home certification, property notice to the county assessor and dispute resolution or troubleshooting at any time during the tariff term. While none of these services

¹ Effective October 7, 2019, Evergy Missouri Metro adopted the service territory and tariffs of Kansas City Power & Light Company (“KCP&L”) and Evergy Missouri West adopted the service territory and tariffs of KCP&L Greater Missouri Operations Company (“GMO”).

would occur without an approved valid project, they are by nature of the activities termed “administrative” components of a project.

2. The \$490 close out fee, which includes the activities described above, will remain a fixed cost to the participant regardless of the project size. The \$490 close out fee will also apply to projects less than \$2,000 and the Program will not exclude projects less than \$2,000. As a protection to the participant, the close out fee is included in the total project cost and in the calculation to verify the project meets the PAYS[®] 80/20 savings requirement. The participant’s tariff will include any installed measure costs and labor associated, a 3% interest rate, and a fixed \$490 close out fee.

3. In Evergy’s initial filing on June 3, 2021, the proposed cap of the close out fee at 25% for projects less than \$2,000 was to adhere to the Report and Order requiring that Evergy cap any administrative costs to the participant. After further discussions with other PAYS[®] operating utilities and program implementer, EEtility, Evergy, with agreement of the parties, made the decision to fix the close out fee to participants regardless of project size. Evergy made the decision to have a fixed close out fee rather than a percentage cap to align with all other Commission-approved Missouri and EEtility-run PAYS[®] programs. It is Evergy’s understanding that parties would like to create consistency in the delivery of Missouri PAYS[®] programs.

4. Evergy is concerned with the suspension of the tariff sheets until October 8, 2021. The Company has a program team and staff hired and ready to launch the Program and is hopeful it can move up the effective date of the tariff should the Commission approve the Stipulation at this week’s Agenda.

5. Should the Commission have additional questions, the Signatories are available to respond at an Agenda session.

WHEREFORE, the Signatories respectfully submit this *Response* to the Commission's Order.

Respectfully submitted,

/s/ Roger W. Steiner

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**ATTORNEY FOR RENEW MISSOURI
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 13th day of September 2021.

/s/ Roger W. Steiner

Roger W. Steiner