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Witness: *Kory J. Boustead*
Sponsoring Party: *MoPSC Staff*
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Case Nos.: *ER-2022-0129 and*
ER-2022-0130
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MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENGINEERING RESOURCES DEPARTMENT

SURREBUTTAL TESTIMONY

OF

KORY J. BOUSTEAD

Evergy Metro, Inc., d/b/a Evergy Missouri Metro
Case No. ER-2022-0129

Evergy Missouri West, Inc., d/b/a Evergy Missouri West
Case No. ER-2022-0130

Jefferson City, Missouri
August 2022

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1 Renew Missouri and OPC proposed modifications of the LSP program and recommendations,
2 followed by an overview of OPC recommendation of the request to rollover unspent IEWAP
3 funds to Dollar Aide. Finally, I will provide Staff's recommendation to reject the proposal to
4 rollover unspent IEWAP funds as filed in my rebuttal testimony.

5 **LOW-INCOME PROGRAMS**

6 **Low-Income Solar Subscription Pilot Program ("LSP")**

7 Q. Briefly describe Renew Missouri's witness Phillip A. Fracica's recommendation
8 for the LSP.

9 A. In his rebuttal testimony¹, Mr. Fracica provides detailed information on how the
10 program can be modified to include a partnership with the Missouri Department of Natural
11 Resources Division of Energy ("DE") to pursue the use of dedicated funds for community solar
12 programs through the US Department of Energy ("USDOE") Low-Income Weatherization
13 Assistance Program ("LIWAP") in Missouri, through the State Energy office, DE. Partnering
14 with DE and the LIWAP funds would allow Evergy to fully leverage all of the energy assistance
15 programs available by offering robust energy efficiency savings and allow for substantial cost
16 savings in low-income solar subscription offerings.

17 Q. Provide a brief overview of Mr. Jordan Seaver's rebuttal testimony.

18 A. In his rebuttal testimony,² Mr. Seaver recommends the Commission deny the
19 LSP program. He further recommends if the Commission approves the LSP, they order the
20 Company to include a shareholder cost-sharing component, similar to that in the current tariffed

¹ Rebuttal testimony of Phillip A. Fracica, page 5, lines 16-19, pages 6-7.

² Direct testimony of Jordan Seaver, page 6, lines 21-27.

1 Solar Subscription Pilot (“SSP”)³ program, agreed to in *Non-Unanimous Stipulation and*
2 *Agreement Concerning Rate Design Issues* filed on September 25, 2018 in Case No.
3 ER-2018-0145 and allows customers to subscribe to the generation output of a solar resource
4 and receive electricity from solar resources.

5 Q. Does Mr. Seaver recommend the cost-sharing component to be the same as in
6 Schedule SSP? If not, what is the difference?

7 A. No, Mr. Seaver recommends a cost-sharing component similar but not identical
8 to the SSP. The cost-sharing component of the SSP has shareholders bearing 75% of the cost
9 of the unsubscribed solar blocks, while participating customers bear the other 25% cost.
10 Mr. Seaver recommends the shareholders bear 90% of the cost and participating customers bear
11 10% of the cost of the unsubscribed solar blocks for the LSP program.

12 Q. What are the concerns Mr. Seaver states about the proposed LSP program?

13 A. In his rebuttal testimony,⁴ Mr. Seaver provides confidential information
14 indicating the rates for the LSP program will increase over time and eventually surpass the
15 Schedule SSP rate, making the choice of low-income customers to be the eligible participants
16 for this program questionable at best. He also cites a confidential presentation given during a
17 call with Staff and OPC, providing further information as to the rate increasing for the
18 customers of the LSP while the rate for the SSP will remain flat.⁵

19 Q. What is Staff’s recommendation after reviewing the information in Mr. Fracica
20 and Mr. Seaver’s testimony?

³ See. P.S.C. MO No. 7, Third Revised Sheet No. 39D.

⁴ Rebuttal testimony of Jordan Seaver, page 5, lines 4-13.

⁵ Rebuttal testimony of Jordan Seaver, pages 4-7.

1 A. In rebuttal testimony, Staff found the program reasonable as a pilot program.
2 However, based on the evidence OPC provided in its testimony, Staff now recommends the
3 Commission deny the Company’s proposed pilot program. However, if the Commission should
4 choose to approve the proposal, Staff recommends a redesign of the program to leverage
5 LIWAP funds as recommended in the rebuttal testimony of Renew Missouri witness
6 Phillip A. Fracica⁶ and the inclusion of the shareholder cost-sharing component as described in
7 Mr. Seaver’s rebuttal testimony.

8 **Income-Eligible Weatherization Assistance Program (“IEWAP”)**

9 Q. Provide an overview of OPC witness Lisa A. Kremer’s review of
10 Evergy witness Kimberly H. Winslow’s proposal to rollover unspent program funds to the
11 Dollar Aide program.

12 A. In her rebuttal testimony,⁷ Ms. Kremer points out Ms. Winslow is requesting
13 two things regarding the IEWAP funds: (1) to transfer \$1 million of unspent income eligible
14 weatherization program funds to the Company’s Dollar-Aide program, and (2) to establish a
15 process to annually roll-over excess funds to Dollar-Aide.⁸

16 Ms. Kremer then goes on to discuss the “recent tariff changes in Docket ET-2022-0145⁹
17 that “were made to remove barriers to customer participation in weatherization,” mentioned in
18 Ms. Winslow’s direct testimony.¹⁰ Stating the tariff changes demonstrate its commitment to
19 assist community action agencies and Evergy customers toward successful weatherization

⁶ Rebuttal testimony of Phillip A. Fracica, page 3-10.

⁷ Rebuttal testimony of Lisa A. Kremer, page 18, lines 7-9.

⁸ Direct testimony of Kimberly H. Winslow, page 65, lines 24-29 and page 66, lines 3-5.

⁹ Approval of the Income-Eligible Weatherization Tariff and Automation of the Income-Eligible Weatherization Program, Docket ET-2022-0145.

¹⁰ Rebuttal testimony of Lisa A. Kremer, page 18, lines 10-23.

1 programs and ensure appropriate spending of ratepayer dollars. The tariff changes resulted in
2 the following weatherization barrier removals: the ability to make home structural repairs, the
3 ability to re-weatherize homes, and reduction of the limiting building income requirements of
4 residents, assistance for agency/staff support, electric service terms, and energy usage minimum
5 thresholds. Ms. Kremer then says how Ms. Winslow goes onto state “the Company is excited
6 to see how this revamped program runs in 2022 and beyond.”¹¹ She then provides the dates the
7 Commission approved the tariff, its effective dates, and discusses Staff’s memorandum filed in
8 regards to the change and the recommendation to approve the changes.

9 Q. What is Ms. Kremer’s recommendation?

10 A. Ms. Kremer states in regards to “the request to transfer \$1 million dollars of
11 unspent weatherization funds, given the Company’s recently approved tariff to facilitate the
12 spending of customer dollars approved in rates for weatherization the request to transfer
13 \$1 million dollars of unspent weatherization funds seems premature.” She recommends
14 providing time to observe how the recent tariff changes will allow the ease of spending by the
15 agencies to manifest.

16 In regards to the annual roll over of weatherization funds request, Ms. Kremer states
17 “I consider this to be an ill-advised proposal and further believe that each unspent year should
18 be reviewed independently and with input and consultation of the agencies charged with
19 spending the weatherization funds.”

20 Q. What is Staff’s recommendation?

¹¹ Rebuttal testimony of Lisa A. Kremer page 18, lines 17-18.

1 A. As stated in rebuttal, Staff is supportive of low-income programs providing
2 relief to customers overall. However, Staff does not support the proposal to roll-over unspent
3 program funds or ratepayer funds collected for a specific low-income program that provides
4 more long-term relief from high energy bills overall by reduced energy usage through
5 weatherization. There are currently programs that exist to provide bill payment relief. Staff
6 acknowledges the potential for funding for weatherization efforts to come in from other sources
7 that can prohibit the utility weatherization funds from being fully expended each program year.

8 Staff continues to recommend: (1) the Commission reject the two proposals (transfer
9 \$1 million dollars unspent program funds to Dollar Aide and the proposal of reoccurring
10 rollover each program year), and to spend down the unspent program funds. (2) The
11 Commission order a reduced level by half (\$286,944) of ratepayer funding to allow the unspent
12 balance to be utilized, as previously done in Case No. ER-2016-0285.

13 Q. Does this conclude your testimony?

14 A. Yes.

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) Case No. ER-2022-0129
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) Case No. ER-2022-0130
Authority to Implement a General Rate)
Increase for Electric Service)

AFFIDAVIT OF KORY J. BOUSTEAD

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW KORY J. BOUSTEAD and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Surrebuttal Testimony of Kory J. Boustead*; and that the same is true and correct according to her best knowledge and belief.


Further the Affiant sayeth not.


KORY J. BOUSTEAD

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 10th day of August 2022.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070


Notary Public