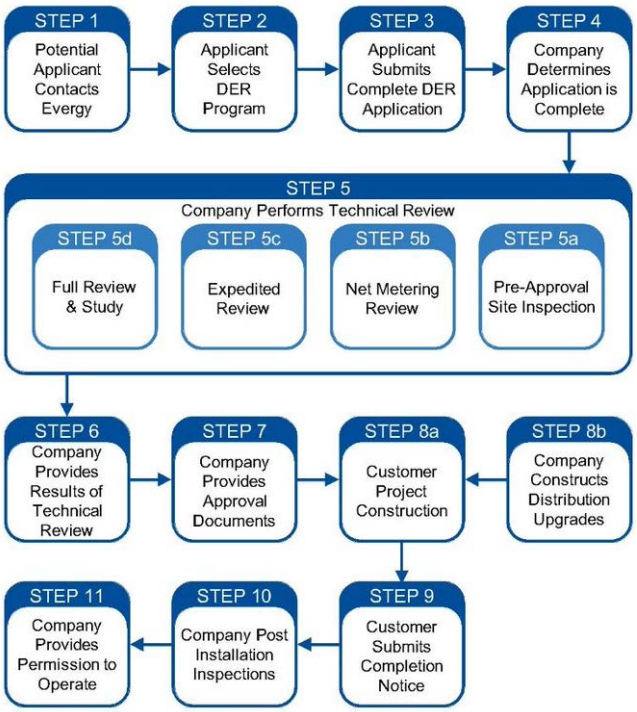
Staff's Questions for Missouri Electric Investor-Owned Utilities (IOUs)

EVERGY MISSOURI METRO & EVERGY MISSOURI WEST
RESPONSES TO UTILITY SPECIFIC QUESTIONS

Describe your utility's existing application and review process for qualifying facility (QF) interconnections. Include in your description how the applicable interconnection costs are determined and how/if the process differs if the QF is interconnecting to distribution or transmission. Provide any available supporting documentation such as process flow-charts.

RESPONSE:



DER Application Processing Fee

Net Metering Review

Expedited Review - Inverter based <500kW

Full Review & Study – Inverter based > 500 kw and all non-Inverter based

A DER Interconnection Application will not be deemed complete until the DER Interconnection Application processing fee, if applicable, is received by the Company. The

following table lists the Application fees by Technical Review required and DER capacity. The Application processing fee is non-refundable.

DER Interconnection Application Fees

	Program	**< 15kW**	**<150 kW**	**<500kW**	**< 1MW**	**<5MW**	**<10MW**
NM	Net Metering MO Jurisdictions	- - -		- - -	- - -	- - -	- - -
NM	Net Metering KS Jurisdictions	$100	$250	- - -	- - -	- - -	- - -
ER	Expedited Review	$250	$500	$750	- - -	- - -	- - -
FR	Full Review	$1,000	$1,250	$1,500	$2,000	$2,000 + $1/kW	$5,000 + $1/kW

Any generator desiring to interconnect to the transmission system must submit a request to Southwest Power Pool according to the process described in Attachment V of the Southwest Power Pool Open Access Transmission Tariff.

Questions related to Costs and/or Benefits of the Rule

1. Costs to Utility
    a. Development of Technical Standards
        i. Does your utility have existing technical standards for the interconnection of cogeneration and small power producers or net-metered systems?

RESPONSE: Yes.

        ii. If not, provide a cost estimate for the development of interconnection standards. Separately, provide an estimate to request approval of those technical standards with the Commission.

RESPONSE: N/A.

iii. If so, provide an estimate to request approval of those technical standards with the Commission.

RESPONSE: Historically, the Company has not had to seek Commission approval for technical interconnection standards.

1. Provide the cost of periodic revisions to the technical standards.

RESPONSE: Approximately $1,200/year based on 4-hours of annual review from representatives from six internal impacted work groups.

b. Development of a Standard Contract template
   i. Does your utility have an existing contract used for cogeneration and small power production requests?

RESPONSE: Yes.

ii. If so, please provide an example.

RESPONSE: *See attachment Evergy Attachment B1 – FA Standard Contract*

iii. Provide a cost estimate for the development of a Standard Contract.

RESPONSE: Evergy has a Standard Contract and therefore there would be no costs.

iv. Provide a cost estimate for the filing and approval of those Standard Contracts with the Commission.

RESPONSE: Historically, we have not requested approval for Standard Contracts for interconnection.

v. Provide a cost estimate for periodic revisions to the Standard Contract

RESPONSE: Approximately $1,200/year based on (4) hours of annual review from representatives from six internal impacted workgroups.

c. Interconnection studies
   i. Provide a 5-year historical summary of the cost to your utility of completing system interconnection studies. Separately identify the cost of interconnections studies completed on behalf of your own utility, other utilities, cogeneration and small power producers, and others. Separately identify the cost of distribution and transmission system studies.

RESPONSE: In reference to DISTRIBUTION Systems - historically, Evergy has not received a substantial number of interconnection study requests prior to 2019. The data prior to 2019 is unknown. The table below identifies the average weekly Engineering (all departments) hours devoted to interconnection studies. All distribution interconnection studies reference in above table was completed solely on Evergy's behalf.

	DISTRIBUTION Interconnection Studies *Engineering* Hours per week
2016	unavailable
2017	unavailable
2018	unavailable
2019	25
2020	35

On average, transmission studies have taken approximately eight engineer hours per month. This includes analysis on the impact of back feed of generation from the Evergy distribution system and evaluation of the impact on the transmission system of facilities interconnecting onto non-Evergy distribution systems.

ii. Based on the past 5-years, separately provide the average cost of system upgrades identified through interconnection studies completed for your utility, other utilities, cogeneration and small power producers, and others. Separately identify the cost of distribution and transmission system upgrades identified through interconnection studies.

RESPONSE: The existing interconnections are non-export contractual agreements. Therefore, the limited number of interconnections currently on Evergy's distribution system did not require system upgrades.

No system improvements were identified on the Evergy transmission system due to these interconnections.

iii. Does your utility expect the standard contracts and implementing a standard rate for purchases from cogeneration and small power producers above 100 kW will result in additional interconnection requests? If so, please provide an incremental cost estimate based on projected interconnection requests over the next 5-years.

RESPONSE: Although, based on communications with installers, there has been increased interest in establishing interconnections due to the ability to export power for purchase, we do not believe that a standard contract based on current pricing offered up to 1 MW or up to 5 MW would itself result in additional interconnection requests.

iv. Does your utility expect to see a difference in interconnection study costs if the standard rate for purchase is offered up to 1 MW or if it is offered up to 5 MW? If so, please provide an incremental cost estimate for each proposed tier.

RESPONSE: As stated above, we do not expect interconnection requests to increase due to a standard contract. However, if such requests do increase, we would expect costs to increase as well. The interconnection study cost is largely dependent on the amount of time required to complete the analysis. Therefore, the incremental cost estimate for interconnection studies based on size alone is difficult to assess.

v. How does the utility pay for interconnection studies?

RESPONSE: Currently, interconnections studies are completed by engineers within the organization and is funded via O&M expenses. Based on the increased number of interconnection requests, Evergy is currently reviewing avenues to recover costs from the installer.

vi. Does the purpose of the interconnection study determine how the costs are recovered (i.e., through rates or directly from a small power producer)? Please explain.

RESPONSE: Cost recovery is currently not considered based on the purpose of the interconnection study. Evergy absorbs all costs associated with completing studies.

d. Energy and/or capacity payments –

i. Provide a 5-year historical summary of energy and/or capacity payments related to the existing cogeneration rule and net-metering rule.

RESPONSE: The Company is working on finalizing this information and will provide subsequent to today's filing.

ii. Does your utility expect the standard contracts and implementing a standard rate for purchases from cogeneration and small power producers above 100 kW will result in additional energy and/or capacity payments? If so, provide an estimate of the incremental cost.

RESPONSE: Given that potential customers above 100 kW can request pricing for energy and/or capacity sales now and such requests are rare, the Company does not anticipate that implementing a standard rate for such purchases from cogeneration and small power producers above 100 kW will result in additional payments.

iii. Does your utility expect to see a difference in energy and/or capacity payments if the standard rate for purchase is offered up to 1 MW or if it is offered up to 5 MW? If so, please provide an incremental cost estimate for each proposed tier.

RESPONSE: The Company expects that the standard rate for purchases would be the same for 1 MW or up to 5 MW.

e. Tracking of data related to interconnections

i. Provide a description of how your utility currently tracks interconnections, for

example, to comply with net-metering reporting requirements or for its own distribution system planning efforts.

RESPONSE: Currently, Evergy uses a platform called Vision that is supported by Applied Energy Group to track the workflow of interconnections. Due to the complexity of larger installs, this system will need to be modified and enhanced to support the necessary workflows for these installs. Our customer information system also hosts the basic details of our on interconnected projects. Due to the limited number of larger interconnection (1 MW and above) Evergy has not adopted a "formal" tracking program to date. We are currently investigating future options. In the interim, distribution planning manually enters the data from the larger systems in Synergi, (the distribution planning analysis tool). However, the net metering data is extracted from our customer information system and imported into Synergi via GTECH.

ii. Provide an incremental cost estimate to expand that tracking as proposed in the draft rule.

RESPONSE: The cost to update Evergy's vision platform to provide the workflow management and tracking capability required will cost $80,000 one-time setup fee, a $8,000/year hosting fee and $15,000/year AEG support.