### 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	)	

# EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST APPLICATION FOR APPROVAL OF MODIFICATION TO ITS TECHNICAL RESOURCE MANUAL

COMES 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") (collectively, the "Company" or "Evergy"), and submits this *Request to Revise Technical Resource Manual* to the Missouri Public Service Commission ("Commission") for approval. In support thereof, the Company respectfully states as follows:

- 1. On December 11, 2019, the Commission approved the Company's MEEIA 3 application in its Report and Order. On November 25, 2020, both Evergy Missouri Metro and Evergy Missouri West filed an application for approval of modifications to their TRMs to incorporate updated EM&V results from program year 4 of MEEIA Cycle 2. Evergy requested that the modified TRM be allowed to become effective on January 1, 2021. On December 16, 2020 the Commission approved Evergy Missouri Metro's and Evergy Missouri West's modified TRM, with the modified TRMs effective January 1, 2021.
- 2. The TRM sets forth measures, the level of energy savings, incremental costs and effective, useful lives associated with each measure. The TRM, and certain updates thereto, are also

used to calculate throughput disincentive on a prospective basis (subject to DSIM <sup>1</sup> true-up provisions).

- TRM updates are based on incorporating the final EM&V results from Evergy Missouri Metro's and Evergy Missouri West's program year 1 in MEEIA Cycle 3. These updates are in line with the Company's commitment during the MEEIA Cycle 3 application supporting testimony to enhance the TRM to provide more clarity and sourcing for measure attributes. The proposed revisions to the TRM were reviewed by the Third- Party Evaluators Guidehouse, Inc., and ADM Associates.
- 4. These updates were provided to Commission Staff on November 10, 2021. Commission Staff provided communication to Evergy Missouri that based on their review to date, they do not have any concerns at this time. These updates were also reviewed by the Implementation Team and by the Company's contractors. Additionally, the measure changes will not require any adjustment of the portfolio's goals. The revisions are found in the following attachments:

<u>Attachment</u>	<u>Name</u>	<u>Description</u>
A	A-TRM MEEIA Cycle 3 2022-01-01.xlsm	DSM Measure Assumptions for Evergy MO TRM with updates proposed
CONFIDENTIAL B	B-Incentive Ranges MEEIA Cycle 3 2022- 01-01_CONF.xlsx	Updated Incentive Range list with updates proposed

5. Based on the information provided herein, Evergy Missouri Metro and Evergy Missouri West asks the Commission to approve the TRM as revised to be effective on January 1, 2022. A January 1, 2022 effective date is necessary to align program tracking data and program evaluation data.

<sup>&</sup>lt;sup>1</sup> "Demand-Side Programs Investment Mechanism"

# **WHEREFORE,** the Company requests the Commission issue an order approving the proposed revisions to the TRM with a January 1, 2022 effective date.

Respectfully submitted,

#### |s| Roger W. Steiner

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#### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand delivered, emailed or mailed, postage prepaid, to all counsel of record in this case on this 18<sup>th</sup> day of November 2021.

s Roger W. Steiner

Counsel for Evergy Missouri Metro and Evergy Missouri West