

Exhibit No.:
Issue(s): *Low Income Programs*
Witness: *Amy L. Eichholz*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Rebuttal Testimony*
Case No.: *EO-2023-0369 and*
EO-2023-0370
Date Testimony Prepared: *July 9, 2024*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

REBUTTAL TESTIMONY

OF

AMY L. EICHHOLZ

EVERGY METRO, INC. d/b/a
Evergy Missouri Metro
CASE NO. EO-2023-0369

EVERGY MISSOURI WEST, INC.
d/b/a Evergy Missouri West CASE
NO. EO-2023-0370

Jefferson City, Missouri
July 9, 2024

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **AMY L. EICHHOLZ**

4 **EVERGY METRO, INC.**
5 **d/b/a Evergy Missouri Metro**
6 **CASE NO. EO-2023-0369**

7 **EVERGY MISSOURI WEST, INC.**
8 **d/b/a Evergy Missouri West CASE**
9 **NO. EO-2023-0370**

10 Q. Please state your name and business address.

11 A. My name is Amy L. Eichholz, and my business address is Missouri Public
12 Service Commission, P. O. Box 360, Jefferson City, Missouri 65102.

13 Q. Are you the same Amy L. Eichholz that filed direct testimony on May 24, 2024,
14 in this case?

15 A. Yes, I am.

16 Q. What is the purpose of your rebuttal testimony?

17 A. The purpose of my rebuttal testimony is to briefly discuss Evergy Metro, Inc.
18 d/b/a Evergy Missouri Metro (“EMM”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri
19 West (“EMW”) (collectively, “Evergy” or “Company”) hard-to-reach programs for
20 income-eligible customers.

21 **HARD-TO-REACH PROGRAMS**

22 Q. What does the Company propose in the Hard-to-Reach Program for
23 income-eligible customers in its Missouri Energy Efficiency Investment Act (“MEEIA”)
24 Cycle 4?

1 A. The Company is proposing a Hard-To-Reach Program encouraging
2 income-eligible customers to incorporate energy efficiency into their homes and increasing
3 access to information about how to lower energy costs. There are two different programs
4 available under the Hard-to-Reach Program: the Income Eligible Program and the
5 Hard-To-Reach Energy Education Program:

6 1. Income Eligible Program provides multiple components that focus on delivering
7 long-term energy savings and bill reductions to income-eligible single family and multi-family
8 customers. Evergy will utilize data analytics and internal data billing information to assess the
9 expected and actual effect of the program on these customers ability to pay their bills and avoid
10 disconnections. Evergy proposes seven components, listed below:¹

- 11 • Low Income Single Family
- 12 • Low Income Multi-Family
- 13 • Moderate Income Single Family
- 14 • Energy Savings Kits & Assessments
- 15 • Enhanced Home Products
- 16 • Income Eligible Single Family New Construction
- 17 • Income Eligible Multi-Family New Construction

18 2. Hard-to-Reach Energy Education Program is designed to educate customers about
19 energy efficiency and influence customer's energy behaviors through education. Evergy
20 proposes three components, listed below:²

¹ EMM & EMW MEEIA Cycle 4 Filing 2025 – 2028 Pages 19 & 20

² EMM & EMW MEEIA Cycle 4 Filing 2025 – 2028 Page 20

Rebuttal Testimony of
Amy L. Eichholz

- 1 • KC-LILAC (“Kansas City–Low Income Leadership Assistance Collaborative”)
- 2 • Market Influencer Training & Outreach
- 3 • Customer Education

4 Q. Does Staff oppose the Hard-to-Reach Program?

5 A. Yes. Staff is opposed to the Hard-to-Reach Program due to all of the other
6 non-MEEIA funding available for income eligible assistance such as:

- 7 • Inflation Reduction Act (“IRA”) which is a federally funded program that is
8 funneling millions of dollars into Missouri to offer rebates to help promote
9 energy efficiency upgrades to residents and businesses of Missouri.
- 10 • Weatherization, a voluntary program that is intended to assist qualified
11 residential customers in reducing their use of energy through weatherization
12 and conservation.
- 13 • Rehousing, a low-income Pilot Program used to provide additional resources to
14 electric customers meeting the eligibility requirements while assessing the
15 delivery methods used in the Program and the impacts on revenues and costs.

16 Q. Does Staff believe it is necessary to continue with the MEEIA income-eligible
17 programs that are currently provided?

18 A. No. With the Federal, State, and the other non-MEEIA programs available to
19 customers, MEEIA income-eligible programs are not necessary.

20 Q. Does this conclude your rebuttal testimony?

21 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 Notice of Intent to)	Case No. EO-2023-0369
File an Application for Authority to Establish)	
a Demand-Side Programs Investment)	
Mechanism)	
)	
n the Matter of Evergy Missouri West, Inc.)	
d/b/a Evergy Missouri West's Notice of)	Case No. EO-2023-0370
Intent to File an Application for Authority to)	
Establish a Demand-Side Programs)	
Investment Mechanism)	

AFFIDAVIT OF AMY L. EICHHOLZ

STATE OF MISSOURI)	
)	ss.
COUNTY OF COLE)	

COMES NOW AMY L. EICHHOLZ and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Amy L. Eichholz*; and that the same is true and correct according to her best knowledge and belief.

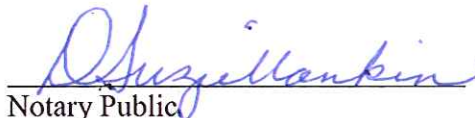
Further the Affiant sayeth not.


AMY L. EICHHOLZ

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 3rd day of July 2024.

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