Exhibit No.:	
Issues:	Income-Eligible Solar Subscription Programs
Witness:	Philip A. Fracica
Sponsoring Party:	Renew Missouri Advocates
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Case No.:	ER-2026-0143
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MISSOURI PUBLIC SERVICE COMMISSION

ER-2026-0143

REBUTTAL TESTIMONY

OF

PHILIP A. FRACICA

ON BEHALF OF

RENEW MISSOURI ADVOCATES

August 11, 2026

PURPOSE OF TESTIMONY AND SUMMARY OF RECOMMENDATIONS

Q. PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.

A. My name is Philip A. Fracica, Director of Programs for Renew Missouri. My business address is 501 Fay Street Suite 206, Columbia, Missouri, 65201.

Q. ARE YOU THE SAME PERSON WHO FILED DIRECT TESTIMONY ON JUNE 30, 2026 AND JULY 14, 2026 CONCERNING EVERGY'S REVENUE REQUIREMENT?

A. Yes.

Q. **WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A. Evergy's current low-income programs, including bill assistance and energy efficiency, are admirable but a gap exists in providing access to renewable energy. Community solar can be utilized to address barriers like homeownership and upfront costs, while offering financial savings and flexibility. Renew Missouri believes future moderate program expansion can be designed to complement existing programs and aims to provide a continuum of affordability, reducing energy burdens for low-income customers.

The federal funding landscape for community solar programs has changed, and Evergy should explore various funding mechanisms to maximize economic benefits for income-eligible participants. Evergy should evaluate expanding its existing Income-Eligible Solar Subscription Pilot into a permanent program, focusing on affordability and leveraging existing relationships and programs.

I. RESPONSE TO COMPANY WITNESS McDONALD - LOW-INCOME AFFORDABILITY AND COMMUNITY SOLAR

Q. HAVE YOU REVIEWED THE DIRECT TESTIMONY OF EVERGY MISSOURI METRO WITNESS KATIE R. MCDONALD?

A. Yes. I have reviewed Ms. McDonald's testimony regarding Evergy Missouri Metro's programs and services for low-income and medically vulnerable customers.

Q. WHAT DOES MS. MCDONALD IDENTIFY AS EVERGY'S APPROACH TO SERVING LOW-INCOME CUSTOMERS?

A. Ms. McDonald describes a portfolio that includes bill-payment assistance, arrearage relief, flexible payment arrangements, energy efficiency, weatherization, and community-based outreach. She further states that Evergy seeks to combine affordability with tools that promote "financial stability, energy efficiency and long-term resilience."

Ms. McDonald identifies several specific programs, including the Economic Relief Pilot Program, Dollar Aide, the Rehousing Pilot Program, the Critical Medical Needs Program, Income-Eligible Weatherization, Weatherization Ready/KC-LILAC, and the Income-Eligible Multifamily Program.

Q. DO YOU SUPPORT EVERGY'S CONTINUED EFFORTS TO PROVIDE THESE PROGRAMS?

A. Yes. These programs provide important assistance to customers experiencing high energy burdens or financial hardship. In particular, I support programs that combine immediate bill assistance with longer-term investments, such as weatherization and energy efficiency, that can reduce a customer's energy usage and bills over time.

However, I believe Evergy's current portfolio leaves an important gap. Income-eligible customers should also have meaningful opportunities to participate in and receive the economic benefits of renewable energy.

Q. Why do you believe this represents a gap in Evergy's current low-income portfolio?

A. Many income-eligible customers face structural barriers that prevent them from installing rooftop solar. A customer may rent their home, live in multifamily housing, have a roof that is unsuitable for solar, or simply lack the financial resources necessary to make an upfront investment in a rooftop system.

These barriers are particularly relevant for income-eligible households because the customers who could benefit significantly from additional tools to reduce their monthly energy burden may be among those least able to make the upfront investment necessary to participate in customer-owned renewable generation.

Community solar provides a mechanism for addressing many of these barriers. As I discussed in my rebuttal testimony in Evergy's 2022 rate cases,[1] community solar can provide financial savings and flexibility for customers who cannot utilize rooftop solar. Community solar can take advantage of economies of scale, reduce upfront entry costs, allow participation by customers who do not own their home, and eliminate the need for participating customers to maintain an individual solar system.

A properly designed income-eligible community solar program can therefore allow customers to receive the economic benefits of solar generation without requiring them to own a home, install equipment on their property, or provide significant upfront capital.

Q. IS THE CONCEPT OF AN INCOME-ELIGIBLE SOLAR PROGRAM NEW TO EVERGY?

A. No. In fact, Evergy and stakeholders have considered this issue for a number of years.

[1] Ex. 502, *Rebuttal Testimony of Philip Fracica*, In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's Request for Authority to Implement A General Rate Increase for Electric Service, Case No, ER-2022-0129.

Renew Missouri was a signatory to the Stipulation and Agreement in Evergy's 2018 rate case under which the Company agreed to consider utilizing a portion of the solar resources constructed to serve its Solar Subscription Program for income-eligible customers. I subsequently provided rebuttal testimony[2] in Evergy's 2022 rate cases regarding the Company's proposed Low-Income Solar Subscription Pilot.

At that time, the proposed program contemplated making a portion of Evergy's solar subscription resource available to income-qualified customers who historically had been unable to realize the benefits of photovoltaic generation on their own property because of upfront cost barriers. Importantly, the stated purpose included allowing those customers to participate in solar generation and achieve bill savings.

My recommendation in this case therefore does not represent an entirely new policy direction for Evergy. Rather, it builds upon work that the Company and stakeholders have already undertaken regarding how solar subscription programs can better serve income-eligible customers.

Q. HOW WOULD INCOME-ELIGIBLE COMMUNITY SOLAR COMPLEMENT THE PROGRAMS DISCUSSED BY MS. MCDONALD?

A. I view these programs as complementary rather than competing approaches.

Bill-payment assistance and arrearage programs provide essential support when customers are already experiencing difficulty paying their bills. Weatherization and energy efficiency reduce the amount of energy a household needs to purchase. Income-eligible community solar can provide another mechanism for reducing the cost associated with the electricity that the household continues to consume.

[2] *Id.*

This type of coordination is also consistent with Evergy's previous approach. In 2022, the Company proposed integrating its Low-Income Solar Subscription Pilot with other economic-support programs available through Evergy in order to provide an economic benefit to income-eligible customers.[3]

Rather than treating bill assistance, energy efficiency, weatherization, and renewable energy as isolated programs, Evergy should seek opportunities to coordinate these resources so that income-eligible customers can receive the greatest practical reduction in their overall energy burden.

Q. WHY IS THAT DISTINCTION IMPORTANT FROM AN AFFORDABILITY PERSPECTIVE?

A. Assistance programs are necessary when a customer faces an immediate affordability crisis, but the Company's long-term affordability strategy should also include investments that reduce the underlying energy burden before a crisis occurs.

For example, bill assistance can help a household address an immediate arrearage. Weatherization and energy efficiency can reduce the household's energy consumption going forward. An appropriately designed community solar program can complement those measures by reducing the cost of the remaining electricity the household purchases.

The objective should be to develop a continuum of affordability programs that both respond to immediate financial hardship and provide customers with opportunities for durable, long-term reductions in their energy costs.

Q. DOES EVERGY CURRENTLY PROVIDE SUBSTANTIAL BILL-PAYMENT ASSISTANCE TO CUSTOMERS?

[3] *Id.*

A. Yes. Ms. McDonald states that in 2025 Evergy linked EMM customers to approximately $5.783 million in bill-payment support and linked EMM and EMW customers collectively to approximately $10.9 million in bill-payment assistance.

I commend the Company for helping customers access these resources. At the same time, the continuing need for substantial bill assistance illustrates why the Commission and Evergy should continue exploring strategies that can provide durable reductions in customer energy burdens.

Bill assistance and long-term bill-reduction investments should not be viewed as substitutes for one another. Both can be important components of a comprehensive affordability strategy.

Q. WHY SHOULD BILL SAVINGS BE A CENTRAL OBJECTIVE OF AN INCOME-ELIGIBLE COMMUNITY SOLAR PROGRAM?

A. Because an income-eligible solar program serves a fundamentally different purpose than a conventional voluntary renewable-energy product.

Some customers may voluntarily pay a premium for renewable energy because obtaining renewable energy is itself their primary objective. For an income-eligible household experiencing a high energy burden, however, affordability should be the central consideration.

Accordingly, the appropriate measure of success should not simply be whether renewable energy is technically available to an income-eligible customer. Participation should provide a reasonable expectation of net bill savings.

This distinction was central to my testimony regarding Evergy's proposed Low-Income Solar Subscription Pilot in 2022.[4] At that time, I recommended modifications intended to increase the savings available to participants and concluded that the program would be most impactful if it could provide greater energy savings to participating income-eligible households.

[4] *Id.*

I continue to believe that principle should guide the design of any future income-eligible solar offering.

Q. ARE YOU RECOMMENDING THE SAME FUNDING APPROACH YOU PROPOSED IN YOUR 2022 TESTIMONY?

A. Not necessarily. My 2022 testimony focused substantially on the opportunity that existed at that time to leverage federal Weatherization Assistance Program funding and coordinate with the Missouri Department of Natural Resources. I recommended that Evergy and DNR explore whether those resources could be used to increase the savings available through the proposed pilot.

The federal funding landscape has changed considerably since that testimony was filed. Accordingly, my recommendation in this case is broader. Evergy should evaluate available federal, state, utility, and other funding mechanisms that could increase the economic benefit provided to income-eligible participants rather than designing the long-term viability of the program around any single funding source.

One potential pathway is the U.S. Department of Energy's Clean Energy Connector. The Connector is intended to facilitate enrollment of LIHEAP-eligible households in qualifying community solar programs that provide meaningful customer savings. DOE has indicated that additional states may participate where a state has an eligible low-income community solar program, cooperation between the state's community solar and LIHEAP administering agencies, and qualifying community solar capacity available for enrollment. Federal guidance also recognizes that LIHEAP funds may be used for community solar subscription fees.

Another potential funding source could emerge if funding previously awarded through EPA's Solar for All program becomes available again. Missouri had been selected for a $156 million Solar for All award intended to support residential solar programs benefiting low-income and disadvantaged households. EPA terminated the national Solar for All program in August 2025, and that termination is currently the subject of litigation. Therefore, I do not recommend that Evergy rely upon those funds today. However, if funding becomes available again, Evergy should evaluate whether it could support expansion of an income-eligible community solar offering.

The principle from my prior testimony that remains relevant is that the program should be designed to maximize the economic benefit delivered to participating households.

Q. SHOULD EVERGY COORDINATE ENROLLMENT IN SUCH A PROGRAM WITH ITS EXISTING LOW-INCOME PROGRAMS?

A. Yes. Evergy already has relationships with customers, community organizations, and assistance agencies that could help identify eligible participants and reduce administrative barriers.

This is also consistent with my previous recommendation. In 2022, I recommended prioritizing outreach to income-eligible customers already receiving some level of energy assistance and coordinating the solar offering with Evergy's broader suite of customer programs.[5]

Where practicable, Evergy should also utilize existing income-qualification processes rather than requiring customers to separately demonstrate eligibility for each individual program.

Q. WHAT DO YOU RECOMMEND?

A. I recommend that the Commission direct Evergy to evaluate expansion of its existing Income-Eligible Solar Subscription Pilot into a permanent or expanded program, with the goal of presenting a proposed program design no later than its next rate case.

[5] *Id.*

If federal or other outside funding becomes available before that time including through restoration of Solar for All funding or another qualifying funding opportunity, I recommend that Evergy evaluate whether that funding provides an opportunity to expand the program between rate cases rather than unnecessarily delaying implementation until its next rate case.

Q. WHAT PRINCIPLES SHOULD GUIDE THE DESIGN OF AN INCOME-ELIGIBLE COMMUNITY SOLAR PROGRAM?

A. At a minimum, I recommend that Evergy consider a program that:

- provides measurable and meaningful net bill savings to participating income-eligible customers;
- does not require a significant upfront payment;
- minimizes or eliminates potential contractual barriers;
- allows participation by renters and customers living in multifamily housing;
- utilizes existing income-qualification processes where practicable rather than creating unnecessary additional administrative barriers;
- coordinates enrollment with Evergy's existing energy-efficiency, weatherization, bill-assistance, and other income-eligible programs;
- utilizes Evergy's existing relationships with community organizations and assistance agencies for customer outreach and enrollment;
- evaluates opportunities to leverage outside funding or complementary programs where doing so can increase participant savings; and

- regularly evaluates participant bill impacts, enrollment, retention, and other relevant metrics to determine whether the program is successfully reducing household energy burdens.

The objective should not simply be to make renewable energy available to income-eligible customers. The program should be designed and evaluated as another affordability tool.

II. RESPONSE TO COMPANY WITNESS LUTZ - SOLAR SUBSCRIPTION AND CUSTOMER AFFORDABILITY

Q. HAVE YOU ALSO REVIEWED THE DIRECT TESTIMONY OF COMPANY WITNESS BRADLEY D. LUTZ?

A**.** Yes. I have reviewed Mr. Lutz's testimony, including his discussion of Evergy's Solar Subscription Service and the Service & Access charge applicable to that service.

Q. WHY IS MR. LUTZ'S TESTIMONY RELEVANT TO YOUR RECOMMENDATION REGARDING INCOME-ELIGIBLE COMMUNITY SOLAR?

A**.** Mr. Lutz's testimony demonstrates that Evergy already has experience administering a subscription-based solar offering and incorporating that offering into its regulated tariff structure. Mr. Lutz explains that Evergy's Solar Subscription Rider, Schedule SSP, includes a Service & Access, or S&A, charge. He states that the charge was originally based on the embedded transmission and distribution costs allocated to the residential class and was added to the cost of the solar resource to represent the costs of the grid.

In this case, Evergy proposes to maintain the S&A charge at $0.040 per kWh.

Q. WHAT DOES THE EXISTENCE OF THE SOLAR SUBSCRIPTION SERVICE DEMONSTRATE?

A**.** It demonstrates that creating a subscription-based mechanism through which customers can participate in a solar resource is not a new concept for Evergy.

In fact, Evergy's experience extends beyond its general Solar Subscription Service. As I discussed previously, Evergy has also developed the Low-Income Solar Subscription Pilot.

This history is significant because my recommendation does not require the Company to start from scratch. Evergy has experience with many of the administrative, billing, tariff, customer-enrollment, and cost-allocation issues associated with a solar subscription product.

The remaining question is how that existing experience can be used to create an offering for customers for whom affordability, rather than simply renewable-energy preference, is the primary consideration.

Q. ARE YOU RECOMMENDING THAT INCOME-ELIGIBLE CUSTOMERS SIMPLY BE ENROLLED IN THE EXISTING SOLAR SUBSCRIPTION SERVICE?

A**.** No. I recommend that Evergy evaluate how its existing income-eligible solar subscription pilot program could be modified or supplemented to create a full program.

Q. WOULD SUCH A PROGRAM NECESSARILY REQUIRE OTHER CUSTOMERS TO BEAR THE COSTS OF SERVING PARTICIPATING CUSTOMERS?

A**.** Not necessarily. Mr. Lutz's testimony demonstrates that Evergy already considers transmission and distribution costs when establishing the pricing of its Solar Subscription Service. He explains that the S&A charge was designed to represent the costs of the grid associated with serving solar subscription customers.

The appropriate program design and cost allocation for an income-eligible offering would need to be evaluated as part of program development. Evergy should examine the cost of the solar resource, expected participant savings, appropriate treatment of transmission and distribution costs, potential outside funding sources, and any other program costs or benefits relevant to establishing a sustainable offering.

Q. WHAT DO YOU RECOMMEND REGARDING THE COMPANY'S SOLAR SUBSCRIPTION SERVICE?

A. I recommend that the Commission direct Evergy to evaluate expansion of its existing Income-Eligible Solar Subscription Pilot into a permanent or expanded affordability-focused offering that builds upon the Company's existing experience with Schedule SSP.

At minimum, that evaluation should examine expected participant bill savings, program pricing, treatment of the Service & Access charge, eligibility requirements, enrollment barriers, coordination with existing assistance and energy-efficiency programs, and opportunities to leverage federal or other outside funding.

Evergy should present the results of that evaluation and, where feasible, a proposed expanded program no later than its next general rate case. If a significant outside funding opportunity becomes available before that filing, particularly funding specifically intended to support low-income community solar, I recommend that the Company evaluate implementation between rate cases rather than waiting for its next rate case to act.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Request of Evergy Metro, Inc. d/b/a Evergy Missouri Metro for Authority to Implement a General Rate Increase for Electric Service	))))	**File No. ER-2026-0143**

AFFIDAVIT OF PHILIP FRACICA

STATE OF MISSOURI)
) **ss**
COUNTY OF BOONE)

COMES NOW Philip Fracica and on his oath states that he is of lawful age; that he prepared the attached Rebuttal Testimony; and that the same is true and correct to the best of his knowledge and belief.

Further the Affiant sayeth not.

Philip Fracica

Subscribed and sworn before me this 11 day of August, 2026.

Notary Public

REGGIE D. BULLOCK
Notary Public - Notary Seal
STATE OF MISSOURI
Boone County
My Commission Expires: April 6, 2029
Commission # 25493480

My Commission expires: April 6, 2029