

**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
Implement a General Rate Increase for Electric
Service

File No. ER-2026-0143

RENEW MISSOURI'S STATEMENT OF POSITIONS

COMES NOW, Renew 2Missouri Advocates d/b/a Renew Missouri (Renew Missouri), and for its *Statement of Position* states that Renew Missouri has not taken a position at this time on all of the issues, but reserves the right to take a position based on evidence presented at hearing. For the issues Renew Missouri did sponsor testimony covering, Renew Missouri states as follows:

39. Green Button Connect

- A. Should the Commission order EMM to implement Green Button Connect ("GBC") in this rate case?**
- B. If the Commission orders EMM to implement GBC, should the Commission adopt Renew Missouri's revenue requirement recommendation?**
- C. If the Commission orders EMM to implement GBC, should Renew Missouri's recommended revenue requirement for studying a regional data hub be ordered by the Commission?**
- D. If the Commission orders EMM to implement GBC, should the Commission adopt Renew Missouri's revenue requirement recommendation?**
- E. If the Commission orders EMM to implement GBC, should Renew Missouri's recommended revenue requirement for studying a regional data hub be ordered by the Commission?**

Position: Renew Missouri respectfully requests the Commission order Evergy to implement GBC, with the associated revenue requirement of ****[REDACTED]****, as updated by Evergy witness Katie McDonald, for both the implementation and the regional hub participation. Across the U.S., numerous other state commissions have required utilities to implement data-sharing platforms of various types. Ameren Missouri will also be implementing GBC as a result of the settlement in

ER-2024-0319. Liberty is also evaluated the steps necessary to implement GBC as part of the settlement in ER-2024-0261. This is in recognition of consumers being able to reduce their energy usage and participate in demand response offerings, which mitigate system-wide peaks. Additionally, GBC will enable Missouri to implement FERC Order 2222, which emphasizes the need for automated data sharing systems for wholesale market participation, aligning with GBC's implementation. The cost estimates provided are reasonable and are based on recent costs from other jurisdictions and updated according to estimates provided by Evergy witness Katie McDonald in rebuttal testimony. The costs associated with GBC will bring numerous benefits, with a recent study showing a range of \$14.17 to \$133.20 of benefit returned per **each** dollar spent per customer.¹ A conservative estimate would expect Evergy customers to see **** [REDACTED] [REDACTED] **** in benefits over time. Growing growth pressures from large load customers also increase the value of demand response and other energy efficiency programs. Evergy's opposition to GBC is based on concerns about cost, cybersecurity, and implementation. However, these concerns are countered by the benefits of GBC, including cost savings for ratepayers, improved demand response programs, and increased competition in the energy market. The implementation of GBC is a necessary step to ensure fair and efficient energy management for all customers.

Furthermore, the proposed tariff provides critical requirements to ensure fairness in the relationship between Evergy and customer-authorized data recipients. Without clarity about certain provisions such as service guarantees or non-discriminatory application of eligibility criteria, monopolies such as Evergy can abuse their power and unfairly diminish the ability of energy management firms to compete on a level playing field. A tariff is necessary to ensure that

¹ Presentation of Eversource, Liberty Utilities and Unitil to the New Hampshire Public Utilities Commission dated October 12th, 2024. Available at https://www.puc.nh.gov/Regulatory/Docketbk/2019/19-197/LETTERS-MEMOS-TARIFFS/19-197_2023-10-09_GSEC_JOINT-GOVERNANCE-COUNCIL-GRIP-PRESENTATION.PDF

ratepayers have the ability to choose energy management providers that best suit them without undue interference. The tariff outlines important definitions, data portability obligations, eligibility criteria for third parties, liability limitations, data quality, and other general provisions. A tariff is necessary to prevent utilities from imposing unfair terms on data recipients and to ensure that customers receive the full benefits of GBC.

The proposed tariff outlines eligibility criteria for third parties to access customer data through the GBC platform. These criteria include technical capability, contact information, acknowledgment of the tariff, and adherence to DataGuard or a similar privacy standard. The tariff also addresses liability, stating Evergy is not liable for third-party actions, and emphasizes data quality and integrity, requiring Evergy to provide accurate and timely data.

The proposed tariff for GBC addresses concerns about utilities imposing unfair terms and conditions on data recipients by mandating independent yearly certification for adherence to GBC standards, sets a 99.5% uptime requirement, and prohibits utilities from unilaterally terminating data-sharing authorizations. The tariff also requires yearly end-to-end testing of the GBC platform to ensure functionality and customer data security.

40. Customer Battery Programs

a. Should the Commission order the adoption of Renew Missouri's proposed battery programs?

Position: Yes, the Commission should order Evergy to comply with the steps outlined the testimonies of Philip Fracica to develop battery programs to offer in its next general rate case. This should include three pilot programs: a Residential Battery Demand Response Pilot Program, a Targeted Residential Grid Support Rebate Pilot Program, and a Large Customer Battery Partnership Pilot Program. The incentive structure should reflect the differing value each battery provides to the electric system, with incentives varying based on customer participation, customer

class, and the distribution system benefits provided. The former two programs are designed to drive reliability and grid resiliency benefits intended to provide all Evergy customers benefits, via (1) a Residential Battery Demand Response Pilot Program designed compensate customers for providing dispatchable grid services and (2) a Targeted Residential Grid Support Rebate Pilot Program that directs incentives toward batteries providing the greatest distribution system value. The Large Customer program involves utility-owned battery systems hosted by large commercial and industrial customers, providing benefits like enhanced resiliency and cost-effective infrastructure solutions. These programs will help Evergy gather operational experience and inform a comprehensive Battery Energy Storage program in future rate proceedings.

41. Income-Eligible Solar Program

a. Should the Commission order the adoption of Renew Missouri's proposed evaluation and expansion of the Income-Eligible solar program?

Position: Yes. Renew recommends expanding Evergy's Solar Subscription Program due to high customer demand, with an additional 4.5 MW of capacity, with 4.0 MW for general subscribers and 500 kW reserved for low-income customers. Unsubscribed low-income capacity should be available to all subscribers after a reasonable enrollment period. Future funding opportunities, such as LIHEAP and the Clean Energy Connector, should be leveraged to improve participation and customer savings. In particular, Renew recommends:

1. Evergy utilizing the additional 4 MW of community solar capacity previously identified for future Solar Subscription Program enrollment, to the extent practicable. If that capacity is no longer available or cannot be transitioned to customer subscriptions within a reasonable timeframe, Evergy should seek Commission approval to expand the Solar Subscription Program through the development of additional community solar resources.

2. An expansion of at least 4.5 MW of additional community solar capacity, with approximately 4 MW made available for general subscribers and 500 kW reserved for an Income-Eligible Solar Subscription Program.
3. Continuing to offer a dedicated Income-Eligible Solar Subscription Program while resizing the reserved capacity to better reflect demonstrated customer participation and allowing any unsubscribed low-income capacity to become available to the general subscriber pool after a reasonable enrollment period.
4. Continue designing the Solar Subscription Program in a manner that allows it to leverage future federal and state funding opportunities, including potential coordination with LIHEAP, the Clean Energy Connector, and, if ultimately available, Missouri's Solar for All program.

WHEREFORE, Renew Missouri respectfully requests the Commission order Renew Missouri position on each of the list issues, and any other relief it deems appropriate in the circumstances.

Respectfully submitted,

/s/Nicole Mers
Nicole Mers
Bar No. 66766
501 Fay Street
Suite 206
Columbia, MO 65201
Phone: 314-308-2729
nicole@renewmo.org

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 25th day of September 2026.

/s/ Nicole Mers