

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

In the Matter of the Application of Evergy Metro,     )  
Inc. d/b/a Evergy Kansas Metro for Approval of its     )  
2022 Energy Efficiency Rider for Program Costs     )  
Incurred January 1 Through December 31, 2021     )  
Docket No. 22-EKME- 464 -TAR

**APPLICATION OF EVERGY KANSAS METRO FOR APPROVAL  
OF ITS 2022 ENERGY EFFICIENCY RIDER**

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Kansas Metro (“Evergy Kansas Metro” or “Company”), f/k/a Kansas City Power & Light Company (“KCP&L”)<sup>1</sup>, and files this Application with the State Corporation Commission of the State of Kansas (“Commission” or “KCC”) for approval of its Energy Efficiency Rider (“EE Rider”). In support of its Application, Evergy Kansas Metro states as follows:

1. Evergy Kansas Metro is a vertically integrated electric public utility company under the jurisdiction of the Commission that is engaged in the production, transmission, delivery and furnishing of power within the meaning of K.S.A. 66-104, in legally designated areas of Kansas. Evergy Kansas Metro holds a certificate of convenience and authority issued by the Commission, authorizing the Company to engage in such utility business. Evergy Kansas Metro has previously filed with the Commission certified copies of its Articles of Incorporation under which it was organized, its Certificate of Registration as a Foreign Corporation authorized to do business in Kansas, and all amendments thereto and restatements thereof, and the same are incorporated herein by reference.

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<sup>1</sup> Effective October 8, 2019, Evergy Kansas Metro adopted the service territory and tariffs of KCP&L; *Order Approving Name Change*, Docket No. 20-KCPE-122-CCN, dated October 8, 2019.

2. On November 20, 2007 the Commission approved a Stipulation and Agreement in Docket No. 07-KCPE-905-RTS (“07-905 S&A”) that provides Evergy Kansas Metro the ability to recover demand-side management (“DSM”) program costs through an EE Rider. The 07-905 S&A requires the Company to make its EE Rider filings by March 31 of each year.

3. On October 1, 2019 in Docket No. 20-KCPE-154-MIS, the Company requested a three-year extension of its five DSM programs until December 31, 2022. The Company provided proposed budgets for 2020, 2021 and 2022. The programs include: Programmable Thermostat (“PT”), Home Energy Analyzer (“HEA”), Business Energy Analyzer (“BEA”), Building Operator Certification (“BOC”) and Income-Eligible Weatherization (“IEW”). On July 23, 2020, the Commission approved the PT and IEW programs and proposed budgets. However, the Commission conditionally approved the three educational programs (HEA, BEA, and BOC) and limited recovery in the EE Rider to the 2019 budgeted amounts that were approved on August 7, 2018 in Docket No. 18-KCPE-124-TAR. Any costs for these programs above the 2019 budgeted amounts would continue to be deferred in a regulatory asset account and Evergy may request recovery of these costs in its next rate case.

4. The Company incurred 2021 DSM costs totaling \$213,940. The educational programs did exceed the 2019 program budgets by \$17,453; therefore, this amount has been excluded from recovery in this filing and will remain deferred for consideration in the Company’s next general rate case. As part of the annual EE Rider filing, the calculation also includes an over-recovery of costs amounting to \$53,698 from two years prior – in this case 2019 costs from Docket No. 20-EKME-410-TAR. The total EE Rider DSM costs for Evergy Kansas Metro included for recovery in this filing is \$160,242.

5. Evergy Kansas Metro hereby files for Commission approval of its 2021 DSM program costs and its proposed 2022 EE Rider tariff. The Company proposes that the Commission approve EE factors effective for July 1, 2022 through June 30, 2023 as shown in the table below.

<b>Service</b>	<b><u>Proposed EE Rider</u></b> <b><u>(\$ per kWh)</u></b>
Residential Service	\$0.00003
Small General Service	\$0.00002
Medium General Service	\$0.00002
Large General Service	\$0.00002

6. Attached to this Application as **Exhibit A** is the proposed 2022 update of the EE Rider tariff, Schedule EE. This tariff reflects the Company's proposal to set the EE factors for each customer class as shown in the table above effective July 1, 2022 through June 30, 2023.

7. In compliance with the Commission's Order Amending Procedural Schedule filed December 15, 2016 in the 16-446 Docket, paragraph 9(b) and Ordering paragraph B, the Company has included an analysis of expenditures associated with its existing DSM programs in this application as confidential **Exhibit B**. Consistent with the Company's Motion to File Out of Time Its Response to CURB, filed December 13, 2016 in that docket, the Company is filing its workpapers showing the analysis of expenditures requested for recovery.<sup>2</sup> These workpapers are

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<sup>2</sup> On November 28, 2016, in the 16-446 Docket, CURB filed its CURB's Response to Kansas City Power & Light Company's Motion to Extend Existing Demand Side Management Programs and Budgets which, in part, recommended that the Commission order KCP&L to file "an analysis of expenditures associated with its six DSM programs in its March 1, 2017 Energy Efficiency Rider application". CURB did not further define such proposed "analysis of expenditures." KCP&L responded to CURB's Response on December 13, 2016 indicating that it would file the analysis of expenditures normally provided to Staff with its annual EE Rider filings and, if CURB was recommending something other than this normal expenditure analysis, then KCP&L objected. CURB did not respond to KCP&L's filing and the Commission did not address a definition of the required "analysis" in its Order. Therefore, KCP&L has interpreted CURB's silence and the Commission's Order as agreement that the normal analysis is compliant.

consistent with the workpapers the Company has always provided Staff associated with its annual EE Rider filings.

8. Certain information included in **Exhibit B** is confidential and the Company requests that it be treated as such by the Commission and Staff pursuant to K.S.A. 66-1220a and K.A.R. 82-1-221a. K.S.A. 66-1220a limits the disclosure of trade secrets or confidential commercial information of regulated entities. K.A.R. 82-1-221a also provides standards for the safekeeping of a regulated entity's confidential commercial information. The information denoted as confidential contained in the **Exhibit B** and submitted to Staff is confidential because it contains information that has not be disclosed to the public and, if disclosed, could place the Company at a competitive disadvantage in negotiating future energy efficiency and demand-side management contracts. As such, Evergy Kansas Metro hereby requests that the Commission issue a Protective Order in this docket to govern the disclosure and dissemination of confidential information.

9. In addition to the undersigned, all correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

Lisa A. Starkebaum  
Manager - Regulatory Affairs  
Evergy, Inc.  
1200 Main Street – 19<sup>th</sup> Floor  
Kansas City, Missouri 64105  
Phone: (816) 652-1277  
Fax: (816) 556-2110  
Email: [lisa.starkebaum@evergy.com](mailto:lisa.starkebaum@evergy.com)

Anthony R. Westenkirchner  
Senior Paralegal, Regulatory Affairs  
Evergy, Inc.  
1200 Main Street – 16<sup>th</sup> Floor  
Kansas City, Missouri 64105  
Phone: (816) 652-1100  
Fax: (816) 556-2110  
Email: [anthony.westenkirchner@evergy.com](mailto:anthony.westenkirchner@evergy.com)

Leslie R. Wines  
Senior Executive Administrative Assistant  
Evergy, Inc.  
818 South Kansas Avenue  
Topeka, Kansas 66612  
Phone: (785) 575-1584  
Email: [leslie.wines@evergy.com](mailto:leslie.wines@evergy.com)

WHEREFORE, Evergy Kansas Metro respectfully requests the Commission approve the proposed Energy Efficiency Rider factors and tariff sheet Schedule EE to be effective July 1, 2022 through June 30, 2023 .

Respectfully submitted,

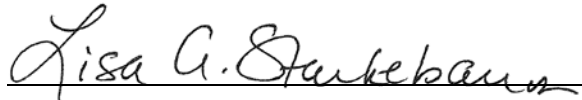
/s/ Cathryn J. Dinges

Cathryn J. Dinges, #20848  
Sr Director and Regulatory Affairs Counsel  
818 South Kansas Avenue  
Topeka, Kansas 66612  
Phone: (785) 575-8344  
[Cathy.dinges@evergy.com](mailto:Cathy.dinges@evergy.com)  
**COUNSEL FOR EVERGY KANSAS METRO**

## VERIFICATION

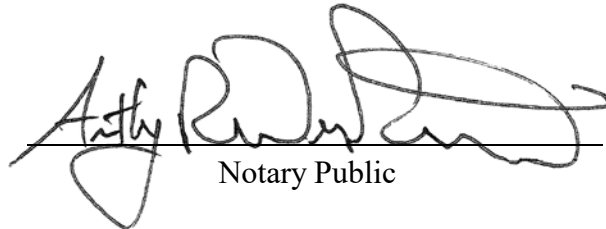
STATE OF MISSOURI     )  
  ) ss  
COUNTY OF JACKSON    )

The undersigned, Lisa A. Starkebaum, upon oath first duly sworn, states that she is the Manager, Regulatory Affairs of Evergy, Inc., that she has reviewed the foregoing Application, that she is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of her knowledge and belief.



Lisa A. Starkebaum  
Manager, Regulatory Affairs of Evergy, Inc.

Subscribed and sworn before me this 31st day of March 2022.

  
Notary Public

My Commission expires:

4/26/2025



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**THE STATE CORPORATION COMMISSION OF KANSAS**

EVERGY METRO, INC., d.b.a. EVERGY KANSAS METRO

(Name of Issuing Utility)

SCHEDULE EE

EVERGY KANSAS METRO RATE AREA

(Territory to which schedule is applicable)

Replacing Schedule EE Sheet 1which was filed June 29, 2021No supplement or separate understanding  
shall modify the tariff as shown hereon.

Sheet 1 of 3 Sheets

**ENERGY EFFICIENCY RIDER  
Schedule EE****AVAILABILITY:**

This Energy Efficiency (EE) Rider (Schedule EE) shall be applicable to all non-lighting Kansas Retail Rate Schedules for Evergy Kansas Metro.

**PURPOSE:**

This EE Rider is designed to recover all costs associated with the following Commission-approved Income-Eligible, Energy Efficiency and Demand Response schedules: (1) IEW; (2) PT; (3) BOC; (4) ER; (5) CHP; (6) NH; (7) RHER; (8) RSTP; and (9) DRI. Evergy Kansas Metro will file a new EE Rider no later than March 31 of each year to recover EE Program costs incurred during the prior calendar year for recovery over the following July through June period.

**BASIS:**

Program Costs will be recovered using an EE factor applied to each customer's bill. The EE factor will be applied to the customer's usage on a kilowatt-hour basis (\$/kWh). Retail customer charges for EE Program Costs are determined by multiplying the kilowatt-hours of electricity billed by the corresponding EE factor. The customer charges associated with this EE Rider will be identified and shown as a separate line on the customer's bill.

**ENERGY EFFICIENCY RIDER AMOUNT CALCULATION:**

A separate EE factor will be calculated for each customer class based upon the demand allocator and total kWh for each class. The EE factor (EEF) for each customer class will be calculated to recover the Program Costs for approved EE Programs from the specified period plus any applicable true up amount from the prior period by applying a class Demand Allocator and then dividing by the total kilowatt-hours (kWh) for that class as follows:

$$EEF_{(class)} = \frac{(EEC_n + TRUE_{n-1}) \times DA_{(class)}}{KWH_n (class)}$$

Issued March 31 2022  
Month Day Year

Effective July 1 2022  
Month Day Year

By 

Darrin Ives, Vice President

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Sheet 2 of 3 Sheets

**ENERGY EFFICIENCY RIDER  
Schedule EE**

Where:

$EEC_n$  = All actual costs associated with Commission-approved EE Programs incurred during the applicable time-period (n). These costs are recorded in a deferred regulatory asset account established to accumulate the Kansas jurisdictional costs of all EE Programs.

$TRUE_{n-1}$  = The annual true-up amount for an EE Rider year, to be determined prior to filing the next EE Rider and to be applied to the subsequent EE factor calculation. The true-up amount will reflect any difference between the total EE revenue collected and the actual costs ( $EEC_n$ ) for the previous applicable time-period (n-1). Such true-up amount may be positive or negative. The true-up amount used to calculate the EEF for the first EE Rider equals zero.

$DA_{(class)}$  = The demand allocator for the applicable non-lighting classes. This demand allocator shall be based on the 12-CP allocator utilized by the Company for its Class Cost of Service Study in the most recent Kansas retail rate case.

$KWH_n (class)$  = The actual kWh electric sales for the Kansas jurisdiction for the applicable time-period (n) of the Class Cost of Service Study for the applicable class.

**TERM:**

This EE Rider shall remain in effect until such time the Commission-approved amount is recovered. In the event the Commission rules on, or a law is passed regarding treatment of such expenses, then Everygy Kansas Metro shall have the right to file for Commission approval of a compliant recovery methodology to replace or revise this EE Rider. Everygy Kansas Metro shall have the right to continue recovery under this EE Rider until such time a replacement methodology is approved and implemented or all Commission-approved amounts are recovered.

**NOTES TO THE TARIFF:**

1. The references to Accounts within the EE tariff are as defined in the FERC uniform system of accounts.
2. The EEC factor will be expressed in dollars per kilowatt-hour (kWh) rounded to five decimal places.

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which was filed June 29, 2021

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Sheet 3 of 3 Sheets


**ENERGY EFFICIENCY RIDER  
Schedule EE**

**EE FACTORS FOR JULY 1, 2022 THROUGH JUNE 30, 2023 USAGE:**

- |    |                        |               |
|----|------------------------|---------------|
| 1. | Residential Service    | \$0.00003/kWh |
| 2. | Small General Service  | \$0.00002/kWh |
| 3. | Medium General Service | \$0.00002/kWh |
| 4. | Large General Service  | \$0.00002/kWh |

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**ENERGY EFFICIENCY RIDER  
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**EE FACTORS FOR JULY 1, ~~2021-2022~~ THROUGH JUNE 30, ~~2022-2023~~ USAGE:**

- |    |                        |   |
|----|------------------------|---|
| 1. | Residential Service    | \$0. <del>00010</del> <u>00003</u> /kWh |
| 2. | Small General Service  | \$0. <del>00009</del> <u>00002</u> /kWh |
| 3. | Medium General Service | \$0. <del>00009</del> <u>00002</u> /kWh |
| 4. | Large General Service  | \$0. <del>00008</del> <u>00002</u> /kWh |

Issued March 31 2022  
Month Day Year

Effective July 1 2022  
Month Day Year

By \_\_\_\_\_  
Darrin Ives, Vice President

**Evergy Kansas Metro**  
**Energy Efficiency Program Cost Recovery**  
**January 1, 2021 through December 31, 2021**

**2021**

**Current Costs (EEC)**

Company Labor	\$	-	
Company Non-Labor	\$	-	
Contractor Costs	\$	231,393	
Less: Amounts over 2019 Approved Educational Budgets	\$	(17,453)	
2021 Program Costs	\$	213,940	See tab EER Detail

**Annual True-Up (TRUE)**

2019 Program Costs to be Recovered	\$	-	Per Docket No. 20-EKME-410-TAR
2019 Program Costs recovered July 2020 - June 2021	\$	(53,698)	
2019 (Over)/Under recovered	\$	(53,698)	See tab TRUE 20-21 EER Collection

**Total EE Rider DSM Costs to be Recovered**

<b>\$</b>	<b>160,242</b>
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**Confidential**

**Program Activity Detail**

**(Account 182680) - January 1, 2021 through December 31, 2021**

**Docket No. Docket No.**  
**18-KCPE-124-TAR 20-KCPE-154-MIS**

<b>Project</b>	<b>Description</b>	<b>Cost Category</b>	<b>2021</b>	<b>2019 Approved Program Budget</b>	<b>2020 Approved Program Budget</b>	<b>Amount Over Budget</b>
SIA002	Low Income Weatherization	Company Labor Company Non-Labor Contractor Costs				Income Eligible Weatherization not limited to budget
	SIA002 Total					
SID001	A/C Cycling	Company Labor Company Non-Labor Contractor Costs				Programmable Thermostat not limited to budget
	SID001 Total					
SIE001	Residential On-line Analysis	Company Labor Company Non-Labor Contractor Costs				Home Energy Analyzer EE Rider limited to 2019 budget
	SIE001 Total					
SIE020	Commercial On-line analysis	Company Labor Company Non-Labor Contractor Costs				Business Energy Analyzer EE Rider limited to 2019 budget
	SIE020 Total					
SIE024	Building Operator Certification	Company Labor Company Non-Labor Contractor Costs				Building Operator Certification EE Rider limited to 2019 budget
	SIE024 Total					
		<b>Company Labor</b>				
		<b>Company Non-Labor</b>				
		<b>Contractor Costs</b>				
		<b>Less amounts over budget</b>				
		<b>Total</b>				

**Evergy Kansas Metro**  
**Energy Efficiency Program Cost Recovery (Account 182441/182680)**  
**July 1, 2020 through June 30, 2021**

**Per Docket No. 20-EKME-410-TAR**

2019 Program Costs	\$	250,193.48
2017 Program Costs	\$	-
2017 Collection	\$	-
2017 Under/(Over)		-
2019 Deferred Program Costs		(250,193.48)
	\$	-

Per EER Order \$ -

Recovered through EER

July 2020	\$	(53,322.72)
August 2020		(272.14)
September 2020		17.75
October 2020		(48.73)
November 2020		(1.48)
December 2020		(16.26)
January 2021		(33.23)
February 2021		(19.64)
March 2021		(2.79)
April 2021		(0.21)
May 2021		2.30
June 2021		(1.13)
	\$	(53,698.28)

Total (Over)/Under recovered \$ (53,698.28)

**Evergy Kansas Metro**  
**Energy Efficiency Program Cost Recovery (Account 182680)**  
**July 1, 2021 through June 30, 2022**

**Per Docket No. 21-EKME-380-TAR**

2020 Program Costs	\$	250,575.64
2018 Program Costs	\$	1,034,181.01
2018 Collection	(953,838.85)	
2018 Under/(Over)		80,342.16
2019 Deferred Program Costs		250,193.48
	\$	<u>581,111.28</u>

Per EER Order \$ 581,111.28

Recovered through EER<sup>1</sup>

July 2021	\$	(28,428.40)	
August 2021		(60,052.86)	
September 2021		(59,876.84)	
October 2021		(45,208.81)	
November 2021		(38,029.11)	
December 2021		(42,577.37)	
January 2022		(50,054.55)	
February 2022		(44,551.76)	<i>projected</i>
March 2022		(42,260.93)	<i>projected</i>
April 2022		(38,786.54)	<i>projected</i>
May 2022		(44,918.15)	<i>projected</i>
June 2022		(53,943.84)	<i>projected</i>
	\$	<u>(548,689.15)</u>	

Total (Over)/Under recovered \$ 32,422.13 *projected*



**Evergy Kansas Metro**  
**Energy Efficiency Rider Calculation and Impact Workpaper**  
**March 31, 2022**

**Inputs**

**2021 DSM Expense \$ 160,241.53**

**Demand Allocation of DSM Expenses and Calculation of Class EER Rate**

	<b>Residential</b>	<b>Small General</b>	<b>Medium General</b>	<b>Large General</b>	<b>Lighting</b>	<b>Total</b>
Demand Allocator (12 CP Method) <sup>1</sup>	50.2190%	5.8270%	11.2680%	31.8860%	0.8000%	100.0000%
Allocation without Lighting class	50.6240%	5.8740%	11.3590%	32.1430%		100.0000%
Allocated DSM Expense	\$ 81,120.67	\$ 9,412.59	\$ 18,201.84	\$ 51,506.43		\$ 160,241.53
Total kWh <sup>2</sup>	2,847,796,936	379,290,426	758,322,278	2,366,184,952	54,013,182	6,405,607,774
<b>EER Rate</b>	<b>\$ 0.00003</b>	<b>\$ 0.00002</b>	<b>\$ 0.00002</b>	<b>\$ 0.00002</b>		

**Typical Monthly Charge**

	<b>Residential</b>	<b>Small General</b>	<b>Medium General</b>	<b>Large General</b>	<b>Lighting</b>	
Typical Usage (kWh) <sup>3</sup>	1,059	1,361	15,918	172,249	1,070	
Typical Monthly EER Charge	\$ 0.03	\$ 0.03	\$ 0.32	\$ 3.44	\$ -	with rates effective July 1, 2022
Typical Previous Monthly EER Charge	\$ 0.11	\$ 0.12	\$ 1.43	\$ 13.78	\$ -	with current rates effective July 1,
Typical Change in Monthly EER Charge	\$ (0.07)	\$ (0.10)	\$ (1.11)	\$ (10.33)	\$ -	
	-70%	-78%	-78%	-75%		

**Typical Monthly Bill Impact**

	<b>Residential</b>	<b>Small General</b>	<b>Medium General</b>	<b>Large General</b>	<b>Lighting</b>
Typical Monthly Bill before ECA,EER & TDC <sup>4</sup>	\$ 119.11	\$ 162.22	\$ 1,495.82	\$ 12,156.65	\$ 139.16
Typical Monthly EER Charge	\$ 0.03	\$ 0.03	\$ 0.32	\$ 3.44	
% of Base Usage Charge	0.03%	0.02%	0.02%	0.03%	

**Notes:**

- 1 The 12 Coincident Peak (CP) allocator utilized by KCP&L for its Class Cost of Service Study (Docket No. 18-KCPE-480-RTS)
- 2 Class Normalized Billing Demands kWh - KCP&L Revenue Summary MFR Section 2 (18-KCPE-480-RTS)
- 3 Average Monthly kWh Usage per Customer - KCP&L Revenue Summary MFR Section 2 (18-KCPE-480-RTS)
- 4 Total class revenue divided by number of customers divided by 12 - KCP&L Revenue Summary MFR Section 2 (18-KCPE-480-RTS)

## Evergy Kansas Metro

Docket No.: 22-EKME-\_\_\_\_-TAR

Date: March 31, 2022

### **CONFIDENTIAL INFORMATION**

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The following information is provided to the Kansas Corporation Commission under  
CONFIDENTIAL SEAL:

<b>Document/Page</b>	<b>Reason for Confidentiality from List Below</b>
Exhibit B, "Program Activity Detail" workpaper	2, 5 and 6

Rationale for the "confidential" designation is documented below:

- "1" Confidential financial information/budget projections, the disclosure of which could affect the Company's standing in the capital markets and/or affect the Company's stock price and/or facilitate insider trading in violation of SEC rules and/or disadvantage the Company in its contract negotiations.
- "2" Contract terms or specifics, or contract information that could be used by existing or future vendors to the disadvantage of Evergy Kansas Metro.
- "3" Sensitive information that could impact pending or threatened litigation.
- "4" Advice of counsel or other paid experts, advisors or consultants falling under the attorney/client communication or work product privilege or information prepared in anticipation of hearing or other administrative proceedings.
- "5" Trade Secret or Commercially Sensitive Information, the disclosure of which would harm the Company competitively and prevent the Company from protecting such information as allowed under Kansas law.
- "6" Information which is contractually obligated to be kept private, which failure to do so could open the Company up to damages.
- "7" Critical Infrastructure Information which poses a security risk if made public.
- "8" Other (specify) \_\_\_\_\_.

Should any party challenge Evergy Kansas Metro's assertion of confidentiality with respect to the above information, Evergy Kansas Metro reserves the right to supplement the rationale contained herein with additional factual or legal information.