BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. Seeking Approval of its 2025 KEEIA Energy Efficiency Rider.	))))	Docket No. 25-EKCE-503-TAR

NOTICE OF FILING OF STAFF'S
REPORT AND RECOMMENDATION

COMES NOW, the Staff of the State Corporation Commission of the State of Kansas ("Staff" and "Commission," respectively), and files the instant Report and Recommendation ("R&R") regarding Staff's review of Evergy Kansas Central, Inc. and Evergy Kansas South, Inc.'s d/b/a Evergy Kansas Central ("Evergy Kansas Central") updated 2025 Kansas Energy Efficiency Investment Act ("KEEIA") Energy Efficiency Rider ("EER"), which allows Evergy Kansas Central to recover costs associated with KEEIA and various energy efficiency programs.

While Staff finds the program costs to be recoverable, Staff contends that Evergy Kansas Central has not provided sufficient information or data to allow Staff to replicate the energy savings results and has also failed to apply Normalized Metered Energy Consumption ("NMEC") analysis to savings calculations at the minimum level prescribed by the Commission Order. Therefore, Staff recommends the Commission not allow recovery of the TD and EO incentives for any Program Year 1 costs where the savings calculations cannot be replicated or where NMEC analysis was not used to meet prescribed minimums for program savings calculations.

Staff's recommendation results in a revised KEEIA EER amount of $11,421,206, including $5,727,906 to be collected from residential customers and $5,693,300 to be collected from non-residential customers. This results in a revised KEEIA EER factor of $0.00084/kWh for residential

customers and $0.00041/kWh for non-residential customers to be effective October 15, 2025, through September 30, 2026.

WHEREFORE, Staff submits its Report and Recommendation for Commission review and consideration and for such other relief as the Commission deems just and reasonable.

Respectfully submitted,

/s/ Carly R. Masenthin

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REPORT AND RECOMMENDATION
UTILITIES DIVISION

TO: Chairperson Andrew J. French
Commissioner Dwight D. Keen
Commissioner Annie Kuether

FROM: Abigail Hayes, Senior Research Economist
Lana Ellis, Interim Chief of Economics and Rates
Robert Glass, Chief of Economics and Rates
Matthew Ghilino, Utilities Engineer
Paul Ownings, Chief Engineer
Katie Figgs, Managing Auditor
Andria Jackson, Deputy Chief of Accounting and Financial Analysis
Chad Unrein, Chief of Accounting and Financial Analysis
Justin Grady, Director of Utilities

DATE: August 29, 2025

SUBJECT: Docket No. 25-EKCE-503-TAR – In the Matter of the Application of Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. Seeking Approval of its 2025 KEEIA Energy Efficiency Rider.

EXECUTIVE SUMMARY:

On June 13, 2025, Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. d/b/a Evergy Kansas Central ("Evergy Kansas Central") submitted an Application seeking approval of its updated 2025 Kansas Energy Efficiency Investment Act ("KEEIA") Energy Efficiency Rider ("EER") allowing Evergy Kansas Central to recover costs associated with KEEIA and various energy efficiency programs. Evergy Kansas Central is seeking cost recovery in the amount of $12,598,189 ($6,446,229 for residential customers and $6,151,961 for non-residential customers) of its Commission-approved energy efficiency programs, which includes the following:

- Program Costs ("PC") in the amount of $9,200,817 ($4,954,669 for residential customers and $4,246,149 for non-residential customers)
- Throughput Disincentive ("TD") in the amount of $93,134 ($59,772 for residential customers and $33,363 for non-residential customers)
- Earnings Opportunity ("EO") in the amount of $1,083,849 ($658,551 for residential customers and $425,298 for non-residential customers)
- Energy Efficiency Demand Response ("EEDR") in the amount of $2,148,784 ($758,151 for residential customers and $1,390,633 for non-residential customers)

- True-Up from Docket No. 25-EKCE-080-TAR ("25-080 Docket") of under collected costs in the amount of $71,604 ($15,086 for residential customers and $56,518 for non-residential customers)

While Staff finds the program costs to be recoverable, Staff contends that Evergy Kansas Central has not provided sufficient information or data to allow Staff to replicate the energy savings results and has also failed to apply Normalized Metered Energy Consumption ("NMEC") analysis to savings calculations at the minimum level prescribed by the Commission Order. Therefore, Staff recommends the Commission not allow recovery of the TD and EO incentives for any Program Year 1 costs where the savings calculations cannot be replicated or where NMEC analysis was not used to meet prescribed minimums for program savings calculations.

Staff's recommendation results in a revised KEEIA EER amount of $11,421,206, including $5,727,906 to be collected from residential customers and $5,693,300 to be collected from non-residential customers. This results in a revised KEEIA EER factor of $0.00084/kWh for residential customers and $0.00041/kWh for non-residential customers to be effective October 15, 2025, through September 30, 2026. Per the Suspension Order dated June 24, 2025, a Commission Order is due in this Docket by February 9, 2026. However, a Commission Order will need to be issued no later than October 15, 2025, in order to facilitate an effective date of October 15, 2025, for the proposed KEEIA EER factor.

BACKGROUND:

In Docket No. 08-WSEE-862-ACT ("08-862 Docket"), Evergy Kansas Central (formerly Westar Energy) initially sought to accumulate energy efficiency program costs in sub-account 182.3 – Other Regulatory Assets. The Commission Order issued on November 12, 2008, conditionally approved Evergy Kansas Central's request to establish an EER subject to certain requirements.[1] Evergy Kansas Central's specific programs, with the respective Dockets, include:

- WattSaver Air Conditioner Cycling Program, Docket No. 09-WSEE-636-TAR
- Energy Efficiency Demand Response Program, Docket No. 10-WSEE-141-TAR
- SimpleSavings Program Rider, Docket No. 10-WSEE-775-TAR

These programs are known as the Legacy Energy Efficiency and Demand Response Programs ("Legacy Programs"). Evergy Kansas Central has received Commission approval to treat the deferral of costs associated with the individual energy efficiency filings listed above as a regulatory asset for future cost recovery. This filing is consistent with the Commission's policy directives on cost recovery established in the Order issued in Docket No. 08-GIMX-441-GIV ("08-441 Docket"), in which the Commission indicated that EERs should be implemented in a manner that "…maintains the Commission's responsibility to review costs for prudence."[2] However, the Commission also stated that utilities should make formal tariff applications for program approval to allow the Commission the opportunity to review program applications in light of Commission

[1] *Final Order*, 08- 862 Docket, p 5 (Nov. 12, 2008). The Commission's Order in the 08-862 Docket established certain requirements including (a) the separate tracking of accumulated costs for each energy efficiency program, and (b) the filing of separate Application with separate tariffs (rates or riders) as applicable for each program.
[2] *Final Order*, 08-441 Docket, pp. 10-1, 37-38 (Nov. 14, 2008).

policy directives.[3] As all energy efficiency programs requested for cost recovery have been previously approved by the Commission, Staff limits its reviews of EERs to examinations of expenditures consistency – both in scope and amount – to that previously granted approval by the Commission.

Energy efficiency has been a long-term interest and goal of the State of Kansas. In 2014, the Kansas Legislature and Governor set State policy to encourage cost-effective energy efficiency programs by passing KEEIA into law. This legislation is intended to encourage and value cost-effective demand-side programs and investments. However, the State made little official progress towards this goal, even with high interest from constituents in implementing these programs.[4]

To aid the State with these energy efficiency goals, the Commission on September 1, 2023,previously granted an order approving Evergy Kansas Central's requested EER and Demand Side Management ("DSM") Portfolio in Docket No. 22-EKME-254-TAR ("22-254 Docket") in accordance with the KEEIA on September 1, 2023, with new customer programs able to launch by March 1, 2024. These nine programs (four residential, four business, one pilot), also known as the KEEIA 2024 – 2028 DSM Portfolio or KEEIA programs, are:

1) **Hard-to-Reach Businesses**: incentives for small businesses and non-profits. This program launched in April 2024.
2) **Hard-to-Reach Homes**: no-cost home upgrades, energy assessments, and saving kits for rural and low-income customers. This program launched in June and September 2024.
3) **Business Energy Education**: tools, resources, and guidance for business, primarily small businesses, interested in energy-related savings.
    a. This program is not included in 25-503 Docket, as Evergy Kansas Central did not report savings.
4) **Home Energy Education**: marketing, outreach, and educational services for rural and low-income customers to learn energy efficiency. This program launched in May 2024.
5) **Business Demand Response**: aid customers with reducing energy consumption during peak demand hours. This program launched in July 2024.
6) **Home Demand Response**: aid customers with reducing energy consumption during peak demand hours, as well as free thermostats and water heater controllers. This program launched in July 2024.
7) **Whole Business Efficiency**: incentives for business customers to install energy efficient, lighting, equipment, and building envelope improvements. This program launched in April 2024.
8) **Whole Home Efficiency**: HVAC rebates, discounts, and on-bill financing in single and multifamily residences, as well as discounted energy savings kits and no cost energy assessments. This program launched in June 2024.
9) **Pilot Incubator**: identify and evaluate new DSM program concepts for future customer needs and utilize evolving technology.
    a. This program is not included in 25-503 Docket, as Evergy Kansas Central did not report savings.

[3] *Id*., ¶ 34.
[4] *See* Order of Evergy's Application and Settlement Agreement for Docket No. 22-EKME-254-TAR.

Evergy Kansas Central transitioned from the Legacy Programs to the KEEIA 2024 – 2028 DSM Portfolio, it was anticipating that EE Costs in July 2023 through February 2024 and True-Up for the preceding EER year would be filed on July 15, 2024, for recovery over the period from November 2024 through September 2025. It was further contemplated the transition over to the KEEIA Programs would occur in the June 2025 filing for the first program year—March 2024 to December 2024 months—with recovery over the period of October 2025 through September 2026. These filings would also continue to include the EEDR recovery as ordered in Docket No. 10-WSEE-141-TAR ("10-141 Docket") and Docket No. 18-KG&E-303-CON ("18-303 Docket").[5]

Through Docket No. 25-EKCE-080-TAR ("25-080 Docket"), Evergy requested to recover final costs from the Legacy Programs, which ended February 2024, with an effective EE factor of $0.000251/kWh charge per applicable customer and with a recovery period of November 2024 to September 2025. Evergy Kansas Central was granted KEEIA program EEDR and True-Up cost recovery for March 2024 to June 2024 in 25-080 Docket and now requests that costs for July 2024 to December 2024 be approved for recovery in 25-503 Docket. However, no expenditure from PC, TD, or EO have been recovered for the KEEIA programs yet.

Therefore, Staff concludes that 25-080 Docket began the first part of transitioning from the Legacy Programs to the KEEIA Programs, and 25-503 Docket is completing the last part. The requested EER in 25-503 Docket will be the first time Evergy Kansas Central will recover costs from the KEEIA programs.

This EER intends to recover costs from applicable customers by using an EE factor multiplied by kWh of billed electricity on a per-customer basis. This charge will be specified and shown on a separate line in the customer's bill. In compliance with the Commission's Order in the 22-254 Docket, Evergy Kansas Central calculates the EE factor with the following variables:

$$EE\ factor = \frac{[PC + TD + EO + EEDR + TRUE]}{PE}$$

Where:

PC = Actual Program Costs incurred
TD = Throughput Disincentive incurred
EO = Earnings Opportunity
EEDR = Energy Efficiency Demand Response
TRUE = the annual True-Up amount for an EER year
PE = Projected Energy, or kWh usage forecasted to be delivered to applicable customers

Program Costs

Program Costs are the actual amount Evergy Kansas Central spends deploying and maintaining the KEEIA programs, which are designed to reduce energy consumption and demand. These costs are entirely reported by Evergy Kansas Central, which are then used to determine the cost-effectiveness and savings of the programs, and they are the largest expense to be recovered.

Per the tariff, PC indicates any prudently incurred program expenditures. These expenditures may include program planning and design; administration; delivery; end-use measures and incentive

[5] *See* Docket No. 25-EKCE-503-TAR sheet 3 of 13 of the filed EER

payments; advertising expense; evaluation, measurement, and verification; market potential studies; and other variables costs deemed necessary to successfully deliver the approved programs. Additionally, PC will include interest carrying costs at Evergy Kansas Central's average of 12 months short-term debt and 6 months of long-term debt on over- or under-recovered balances, calculated by the following:

$$((Short-term\ debt\ interest\ rate\ multiplied\ by\ 12)\ + \\ (Long-term\ debt\ interest\ rate\ multiplied\ by\ 6))\ /\ 18$$

Throughput Disincentive

The TD exists to alleviate the disincentive an electric utility and its shareholders have when implementing DSM programs, which directly cause a decrease in electricity consumption, and therefore, a reduction in revenue. It is meant to represent the utility's lost margins associated with the successful application of the KEEIA programs.

Each program has its own TD calculation in $/kWh to reflect all revenue lost on kWh minus riders, determined by the following:

$$TD\$ = MS\ x\ NMR$$

Where:

TD$ = throughput disincentives dollars to be collected per month, per customer class basis;
MS = the sum of all programs monthly savings in kWh, per month, per customer class basis; and

NMR = net margin revenue, given by Table 1

Table 1: Net Margin Revenue Rates by Rate Class By Month

Class	January	February	March	April	May	June	July	August	September	October	November	December
Residential - RES	$ 0.07901	$ 0.07901	$ 0.07901	$ 0.07901	$ 0.07901	$ 0.08666	$ 0.08666	$ 0.08666	$ 0.08666	$ 0.07901	$ 0.07901	$ 0.07901
Residential - RSDG	$ 0.07753	$ 0.07753	$ 0.07753	$ 0.07753	$ 0.07753	$ 0.08607	$ 0.08607	$ 0.08607	$ 0.08607	$ 0.07753	$ 0.07753	$ 0.07753
Non Residential - SGS	$ 0.06737	$ 0.06737	$ 0.06737	$ 0.06737	$ 0.06737	$ 0.07355	$ 0.07355	$ 0.07355	$ 0.07355	$ 0.06737	$ 0.06737	$ 0.06737
Non Residential - MGS	$ 0.02187	$ 0.02187	$ 0.02187	$ 0.02187	$ 0.02187	$ 0.02777	$ 0.02777	$ 0.02777	$ 0.02777	$ 0.02187	$ 0.02187	$ 0.02187
Non Residential - LGS	$ 0.02449	$ 0.02449	$ 0.02449	$ 0.02449	$ 0.02449	$ 0.02366	$ 0.02366	$ 0.02366	$ 0.02366	$ 0.02449	$ 0.02449	$ 0.02449
Non Residential - LPS	$ 0.02346	$ 0.02346	$ 0.02346	$ 0.02346	$ 0.02346	$ 0.02239	$ 0.02239	$ 0.02239	$ 0.02239	$ 0.02346	$ 0.02346	$ 0.02346
Non Residential - LTM	$ 0.03528	$ 0.03528	$ 0.03528	$ 0.03528	$ 0.03528	$ 0.03544	$ 0.03544	$ 0.03544	$ 0.03544	$ 0.03528	$ 0.03528	$ 0.03528
Non Residential - ICS	$ 0.04568	$ 0.04568	$ 0.04568	$ 0.04568	$ 0.04568	$ 0.04568	$ 0.04568	$ 0.04568	$ 0.04568	$ 0.04568	$ 0.04568	$ 0.04568
Non Residential - SPECIAL	$ 0.02341	$ 0.02341	$ 0.02341	$ 0.02341	$ 0.02341	$ 0.02465	$ 0.02465	$ 0.02465	$ 0.02465	$ 0.02341	$ 0.02341	$ 0.02341
Non Residential - CHURCH	$ 0.07120	$ 0.07120	$ 0.07120	$ 0.07120	$ 0.07120	$ 0.10509	$ 0.10509	$ 0.10509	$ 0.10509	$ 0.07120	$ 0.07120	$ 0.07120
Non Residential - SCHOOL	$ 0.05484	$ 0.05484	$ 0.05484	$ 0.05484	$ 0.05484	$ 0.06002	$ 0.06002	$ 0.06002	$ 0.06002	$ 0.05484	$ 0.05484	$ 0.05484
Non Residential - EV	$ 0.09957	$ 0.09957	$ 0.09957	$ 0.09957	$ 0.09957	$ 0.13057	$ 0.13057	$ 0.13057	$ 0.13057	$ 0.09957	$ 0.09957	$ 0.09957

Further, *MS* is calculated by the following:

$$MS = (MASCY + CASPY - RB)\ x\ LS$$

Where:

MC = measure count for a given program year, for a given class, for each measure is the number of measures installed in the current program year;
ME = measure energy, or the savings for each measure reported in the final Evaluation Measurement & Verification ("EM&V") report for the current program year;
MAS = the sum of *MC* multiplied by *ME* for all measures in a program in the current program year;
CAS = cumulative sum of *MAS* for each program for the KEEIA programs;
CY = current program year;

PY = prior program year;
RB = rebasing adjustment[6]; and
LS = load shape of each program monthly, as shown in Table 2.

Table 2: Load Shape Percent for Each Program by Month

Program Name	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Whole Business Efficiency	8.117%	7.809%	8.087%	8.291%	9.156%	8.765%	9.264%	8.805%	7.652%	8.337%	8.021%	7.695%	100.000%
Business Energy Education	8.179%	8.120%	8.098%	8.325%	8.469%	7.799%	8.543%	8.495%	7.907%	9.084%	8.687%	8.294%	100.000%
Hard-to-Reach Businesses	7.805%	7.539%	7.881%	8.365%	9.589%	9.288%	9.810%	8.999%	7.486%	8.080%	7.742%	7.416%	100.000%
Hard-to-Reach Homes	5.945%	4.702%	3.666%	3.687%	7.312%	16.682%	17.456%	17.112%	11.193%	3.296%	3.617%	5.330%	100.000%
Home Demand Response	1.864%	1.561%	1.245%	2.153%	7.472%	20.996%	22.390%	22.384%	14.106%	2.290%	1.409%	2.129%	100.000%
Whole Home Efficiency	3.864%	3.076%	2.419%	3.069%	7.738%	19.364%	20.049%	19.668%	12.397%	2.529%	2.363%	3.464%	100.000%
Home Energy Education	7.702%	7.150%	8.021%	7.853%	8.530%	8.863%	9.385%	9.398%	8.511%	8.612%	7.952%	8.023%	100.000%

Additionally, like PC, TD will include interest carrying costs at Evergy Kansas Central's average of 12 months short-term debt and 6 months of long-term debt on unrecovered balances, calculated by the following:

$$((Short-term\ debt\ interest\ rate\ multiplied\ by\ 12)\ + (Long-term\ debt\ interest\ rate\ multiplied\ by\ 6))\ /\ 18.$$

Earning Opportunity Award

The EO provides a direct incentive for Evergy Kansas Central to help its customers use energy more efficiently, since Evergy Kansas Central only accesses its EO when customers save energy. If customers do not benefit, then Evergy Kansas Central does not receive earnings.[7]

The EO is the annual incentive ordered by the Commission based on actual performance verified through EM&V against planned targets. This is calculated through an EO Awards matrix, seen in Table 3. For this filing, Evergy Kansas Central and Staff are focused on Program Year 1 performance and calculations.

[6] The Rebasing Adjustment shall equal the CAS defined below applicable as of the date used for the KEEIA normalization in any general rate case resulting in new rates becoming effective during the accrual and collection of TD$ pursuant to KEEIA 2024 – 2028 DSM Portfolio. In the event more than one general rate case resulting in new rates becoming effective during the accrual and collection of TD$ pursuant to KEEIA 2024 – 2028 DSM Portfolio, the Rebasing Adjustment shall include each and every prior Rebasing Adjustment calculation. *See* Docket No. 25-EKCE-503-TAR sheet 7 and 8 of 13 of the filed EER.
[7] *See* Docket No. 22-EKME-254-TAR Order on Evergy's Application and Settlement Agreements.

Table 3: Evergy Kansas Central Earnings Opportunity Matrix (w/ reserve budget)

Program Name	Target Incentive		Stretch Incentive	
	Metric	Amount	Metric	Amount
Hard-to-Reach Businesses	Note 1	$ 815,915	Same as Target	
Hard-to-Reach Homes	Note 2	$ 368,713		
Business Energy Education	Note 3	$ 306,567		
Home Energy Education	Note 3	$ 203,915		
Business Demand Response	Note 4	$ 1,236,165	125% of Target	$ 1,545,206
Home Demand Response	Note 5	$ 1,699,613	125% of Target	$ 2,124,516
Whole Business Efficiency	Note 6	$ 4,476,539	125% of Target	$ 5,595,673
Whole Home Efficiency	Note 7	$ 2,089,126	125% of Target	$ 2,611,408
Total		$ 11,196,553		$ 13,571,914

The metrics referenced in the matrix can be seen in Table 4.

Table 4: Annual Earnings Opportunity Calculation

Note 1	The annual Hard-to Reach Business Program performance metric is based on first-year incremental MWh energy savings reported in the EM&V report. The calculation of the Annual Incentive Amount is MWh achieved multiplied by the rate of $23.21/MWh.
Note 2	The annual Hard-to Reach Homes Program performance metric is based on first-year incremental MWh energy savings reported in the EM&V report. The calculation of the Annual Incentive Amount is MWh achieved multiplied by the rate of $25.88/MWh.
Note 3	1) Community Events held quarterly w/ documentation (4 / year); 2) minimum of 10% eligible customers completing online energy analysis yearly; 3) EM&V customer survey of awareness of programs greater than 50%. If metrics are achieved, then the annual Incentive Amount is 25% of the target total of $306,567 over four years for Business and $203,915 over four years for Home.
Note 4	This performance metric will be based on the cumulative MW demand response capability at the end of each program year. For Business DR, the cumulative demand response capability will be the evaluated MW from customers enrolled during each year's summer peak events. The cumulative DR capability will be reported each year in the EM&V report. The target is 47.20 MW. Target Incentive Amount is calculated as 15% of Net Benefits from Business DR at target MW reduction. The calculation of the Annual Incentive Amount is incremental MW achieved multiplied by a rate of $26,190.17/MW.
Note 5	This performance metric will be based on a combination of the cumulative MW demand response capability at the end of each program year and first-year incremental MWh energy savings reported in the EM&V report. For Home DR, the cumulative demand response capability in each year will be the normalized average peak savings per participant multiplied by the number of participants enrolled at the end of the program year. The cumulative DR capability will be reported each year in the EM&V report. The total target is 61.64 MW. The total target for Cumulative Incremental First Year MWh savings is 3.936 MWh. Target Incentive Amount is calculated as 15% of Net Benefits from Home DR at target MW reduction. The calculation of the Annual Incentive Amount is incremental MW achieved multiplied by a rate of $26,190.17/MW and MWh achieved multiplied by the rate of $21.69/MWh.
Note 6	The performance metric for Whole Business Efficiency will be a combination of first-year incremental MW coincident peak demand savings reported in the EM&V report and first-year incremental MWh energy savings reported in the EM&V report. The hard to reach and energy education energy savings will be excluded from this performance metric. The total targets for Cumulative Incremental First Year MWh savings is 81,451 MWh. The total target for Cumulative Incremental MW Coincident with System Peak is 29.75 MW. The calculation of the Annual Incentive Amount is MW achieved multiplied by a rate of $91,093.72/MW and MWh achieved multiplied by the rate of $21.69/MWh.
Note 7	The performance metric for Whole Home Efficiency will be a combination of first-year incremental MW coincident peak demand savings reported in the EM&V report and first-year incremental MWh energy savings reported in the EM&V report. The hard to reach and energy education energy savings will be excluded from this performance metric. The total target for Cumulative Incremental First Year MWh savings is 24,150 MWh. The total target for Cumulative Incremental MW Coincident with System Peak is 17.18 MW. The calculation of the Annual Incentive Amount is MW achieved multiplied by a rate of $91,093.72/MW and MWh achieved multiplied by the rate of $21.69/MWh.

Energy Efficiency Demand Response

As previously stated, this filing continues to include the EEDR recovery as ordered in the 10-141 Docket and 18-303 Docket. In the 10-141 Docket, legacy Westar stated that the EEDR will "supplement, enhance, and expand" the utility's ability to interrupt large users of energy and was allowed by Commission order to defer EEDR program-associated costs as a regulatory asset, as well as defer cost recovery to future EER filings. In 18-303 Docket, the Commission granted another order that maintained the EEDR's ability to recover its costs through the EER. In general, the EEDR intends to recover costs associated with customers participating in DR programs, such as Interruptible Service.

For participating in the program, customers are given a monthly capacity incentive credit equal to $4.00 per kW of DR load. They also receive Event Payment credits at a variable rate of $75.00 to $100.00 for all reduced load during the curtailment event. If the participant fails to reduce load as required by the program, they receive a $16.00 per kW per month penalty for all excess customer demand.[8]

Annual True-Up

The annual true-up amount for an EER year is determined prior to filing the next EER and intends to be applied to the subsequent EE Factor calculation. The true-up amount will reflect any difference between the approved recovery amount and the actual recovery amount during the time the EE Factor was in effect for the prior recovery period. Such true-up amounts may be positive or negative.

Projected Energy

Evergy Kansas Central has calculated the KEEIA EER rates by utilizing the demand allocator and forecasted kWh to be delivered to the customers to which the EER applies during the applicable recovery period of October 2025 through September 2026. The purpose of projected energy is to serve as the denominator for spreading the EER costs over usage to calculate the rider charge. It is essential for determining a specific $/kWh charge per customer class.

ANALYSIS:

Evergy Kansas Central is requesting recovery of EER KEEIA costs totaling $12,598,189. Of this amount $12,526,585 is related to current unrecovered costs which can be broken down into the following two components: (1) deferred KEEIA 2024 – 2028 DSM Portfolio costs related to Program Year 1 totaling $10,377,901;[9] and (2) unrecovered charges from the Legacy and DRP totaling $2,148,784. The remaining $71,604 is related to the true-up of unrecovered costs resulting from the 25-080 Docket.

[8] *See* Docket No. 10-WSEE-141-TAR

[9] This amount reflects the sum of $9,200,817 related to PC, $93,134 related to TD incentives, and $1,083,849 related to EO incentive. It should be noted that the PC and TD amounts includes interest carrying costs based on the Company's average of 12 months of short-term debt and 6 months of long-term debt on the unrecovered balances.

Consistent with the tariff, these costs are recovered through the KEEIA EER rates. Staff has calculated revised KEEIA EER rates based on its recommended revised costs and utilizing the demand allocator and forecasted kWhs for the period October 2025 through September 2026. As shown in Table 5 below, this results in effective EE factors of $0.00084 for residential customers and $0.00041 for non-residential customers. All variables of interest are discussed and analyzed in further detail below.

Table 5: June 2025 EKC KEEIA, Energy Efficiency and Demand Response Expenditures Rate Calculations

		Residential	Non-Residential	Total Costs
Program Costs + Interest	Program Year 1	$ 4,954,669	$ 4,246,149	$ 9,200,817
Throughput Disincentive	Program Year 1	59,772	33,363	93,134
Earnings Opportunity	Program Year 1	658,551	425,298	1,083,849
Energy Efficiency Demand Response Rider (EEDR)	July 2024 through December 2024	758,151	1,390,633	2,148,784
Total Program Year 1		$ 6,431,143	$ 6,095,442	$ 12,526,585
True up - Docket 25-EKCE-080-TAR	July 2024 through December 2024	15,086	56,518	71,604
Total True-up		$ 15,086	$ 56,518	$ 71,604
Evergy Kansas Metro Total Costs		$ 6,446,229	$ 6,151,961	$ 12,598,189
Staff's Adjustment to Throughput Disincentive		(59,772)	(33,363)	(93,134)
Staff's Adjustment to Earning Opportunity		(658,551)	(425,298)	(1,083,849)
Total Staff Adjustment		$ (718,323)	$ (458,661)	$ (1,176,984)
Staff's Adjusted Total Costs		$ 5,727,906	$ 5,693,300	$ 11,421,206
Forecasted kWh	October 2025 through September 2026	6,786,236,889	13,872,938,388	20,659,175,277
		Residential	**Non-Residential**	
Staff's Revised Energy Efficiency Rate:		**$ 0.00084**	**$ 0.00041**	

Program Cost

Evergy Kansas Central is requesting to recover program-related costs totaling $9,200,817, which includes $4,954,669 for residential customers and $4,246,149 for non-residential customers. Staff confirmed that the costs for these programs were incurred properly and recorded by Evergy Kansas Central for the period of March 2024 through April 2025.

To facilitate its review of Evergy Kansas Central's energy efficiency program costs, Staff submitted various data requests, including supporting invoices, workpapers, etc. Staff also reviewed general ledger support for these costs and has confirmed that the costs indeed were recorded by Evergy Kansas Central for these program for the year 2024. Staff also had several discussions with Evergy Kansas Central about the costs requested for recovery.

During the course of its audit, Staff examined the annual expenditures included in the current filing for each of Evergy Kansas Central's energy efficiency programs compared to their respective annual program budgets. This comparison, including any overspending that may have occurred during the 2024 program year, are reflected in the table below.

Table 6: Staff's Comparison of Program Budget Year 1 vs. Actual Expenditures

Program	Program Budget for Year 1	Expenditures January 2024 - December 2024	Budget Overage
Business Demand Response	$453,582	$1,157,589	($704,007)
Whole Business Efficiency	$4,004,356	$1,304,632	-
Business Energy Education	$927,222	$423,762	-
Hard-to-Reach Businesses	$1,548,969	$1,156,830	-
Business Sub-total	**$6,934,129**	**$4,042,814**	
Hard-to-Reach Homes	$1,650,689	$1,495,627	-
Home Demand Response	$2,039,239	$1,452,762	-
Whole Home Efficiency	$907,024	$868,087	-
Home Energy Education	$721,387	$909,504	($188,117)
Residential Sub-total	**$5,318,338**	**$4,725,980**	
Pilot Incubator	$191,764	$170,582	-
Total	**$12,444,231**	**$8,939,375**	**$0**

As depicted in the table, Evergy Kansas Central expenditures for its Business Demand Response and Home Energy Education programs related to its non-residential and residential customers, respectively, exceeded the annual program budget amounts for year one of the programs (PY1 budget). Staff notes that while these programs weren't significantly over budget, the budget overages were offset by the underspending related to the other programs included in the total budget. Therefore, the portfolio as a whole was within PY1 budget tolerances, a few programs within EKC exceeded their first-year budgets due to higher than anticipated customer participation and initial start-up costs. These overages are linked to program delivery expenses and incentive payments that surpassed initial budget projections. More specifically, in response to Staff inquiries regarding these overages, Evergy Kansas Central provided the following information:

- **Business Demand Response overages:** Evergy Kansas Central exceeded its budget by 155% primarily due to start-up delivery costs and higher enrollment than expected. Incentive spending was also elevated as Evergy Kansas Central surpassed its energy savings targets, achieving 10.8 MW against a 7.1 MW goal. Delivery costs are expected to align with the four-year budget on a straight-line basis.
- **Home Energy Education overspending:** Evergy Kansas Central went approximately 26% over budget in this program's first year by investing in foundational marketing and education efforts it found critical for the successful launch and sustained impact of KEEIA. This included prepaying for four years of marketing collateral to support quarterly mailed reports, establishing a strategic outreach framework.

Additionally, Staff reviewed the program cost expenditures based on Staff's historical understanding of the purpose and scope of the programs. This portion of Staff's review consisted of: (1) researching previous filing made by Evergy Kansas Central related to its energy efficiency program offerings; and (2) reviewing the costs in light of the agreed-upon terms related to public

outreach and education expenditures outlined in the tariff. Based on these assessments, Staff finds Evergy Kansas Central is maintaining a similar level of energy efficiency programs and offerings. Therefore, based on these assessments, Staff concludes that the program-related expenditures requested for recovery in this docket appear to be in line with previous Commission Orders.

Throughput Disincentive

Evergy Kansas Central is requesting to recover a total of $93,134 related to TD costs, including $59,772 for residential customers and $33,363 for non-residential customers.

In its Application initiating the 22-254 Docket (Application), Evergy included an outline of its plans to conduct EM&V as part of the DSM proposal. The Application proposed to engage a third-party vendor to conduct EM&V. Further, the EM&V was expected to be an independent assessment of the program that would serve as a continuous improvement and quality assurance tool for program delivery.

The Application also requested Commission approval of a Technical Reference Manual (TRM), that would be used as the basis for calculating the energy savings and revenue requirement associated with the DSM portfolio. The TRM consists of an extensive list of "measures" that can be undertaken to reduce the amount of energy used by a given piece of equipment or facility while delivering equivalent end-use service. The TRM provides an estimate of the annual energy and demand savings associated with each measure. In this case, the TRM relies extensively on energy savings values developed by the State of Illinois. The Application proposed that the measures and their associated savings estimates be approved by the Commission as the basis for calculating the energy savings and Lost Revenue Adjustment Mechanism (LRAM) in the DSM portfolio.

On September 1, 2023, The Commission issued an Order approving the 22-254 Application (22-254 Order) and subsequent settlement agreement with conditions. With respect to the EM&V process, the Commission noted its preference for a "robust and modern EM&V methodology" and expressed a strong preference for, "… 'measured savings,' as opposed to 'deemed savings' approaches. And more specifically, meter-based data should be used in every instance where it is feasible and cost-effective." In order to provide further guidance to Evergy regarding the meaning of the phrase "measured savings", the Commission included a footnote to its order directing the parties to an order issued by the California Public Utilities Commission (CPUC) discussing an EM&V process using meter-based measurement.

On January 23, 2024, Evergy and Staff filed a joint motion for approval of a "meter-based" EM&V methodology and an updated implementation timeline. On February 29, 2024, the Commission approved the proposed timeline and incorporated by reference in its Order the EM&V Methodology (Methodology) contained in the earlier joint motion from Evergy and Staff. In this document, Evergy commits to using the evaluation framework from the CPUC "NMEC Rulebook", Version 2.0 that was released on January 7, 2020. The section of the methodology states, however, that there will be times when NMEC will not be the preferred verification method. In the EM&V Plan, Evergy recommends that:

> The Kansas TRM should be utilized for **exceptions when "measured savings" and meter-based data are not feasible and cost-effective** (emphasis added); and for measures for which the TRM is selected as the method of calculating

> savings, Evergy will explain its rationale—including specific reasons that measured savings are not practical for the given measures—to the Commission.

In another section of the Methodology, Evergy states:

> When the outside-of-NMEC standards are used for EM&V on behalf of KEEIA programs, Evergy's independent, third-party EM&V vendor will document and explain the use of the other standards and exactly how they vary from NMEC Rulebook.

In January 2025, ADM Associates, Inc. (ADM), the company selected by Evergy to perform the EM&V analysis, provided Staff with an EM&V Plan for KEEIA Project Year 1 (PY1). For the most part, this plan follows the Methodology contained in the Commission's February 2024 Order.

Although Evergy Kansas Central is not required to seek Commission approval of the PY1 EM&V Report, Staff notes a transparent, accurate, and complete EM&V for PY1 is crucial to providing a recommendation in this Docket, because the claimed savings provide the basis for the EO and TD calculations. In other words, any error in claimed savings will result in inaccurate values for the EER to be collected from the ratepayer.

Using discovery responses, Staff reviewed the seven programs in the portfolio for compliance with Sections 2.4.1 and 2.8 of the Methodology. Our comments related to compliance with these sections of the Plan are attached as Exhibit 2 as a scorecard for each of the programs included in the M&V Report. Based on Staff's subjective review of the Report compared to the 18 criteria listed in the Methodology, Staff rated compliance with the Methodology requirements as 21.4% satisfactory, 19.8% needs improvement, and 45.2% unsatisfactory.[10] In performing this review, Staff requested Bates White to evaluate-among other things- Evergy Kansas Central's compliance with the requirement that the M&V process must be transparent and replicable. With respect to transparency, the Commission Order requires[11]:

- M&V Plans must describe M&V transparency, which must include (but is not limited to) discussion of the following components of transparency.
- To demonstrate the replicability of savings calculations, the Commission will be provided all analytical methods, work papers, and data, including M&V spreadsheets, R code, explanatory presentations (e.g., workshop presentations and tutorials), and supporting files, references, and literature.
- M&V methods must utilize open-source software and analytical tools, if possible. Examples of software and tools include M&V spreadsheets, open-source R code, and the R application "RM&V 2.0" developed by Berkeley Lab, a leader in advanced M&V research.
- Proprietary software and methods are not encouraged but are not prohibited if the Commission determines that it is satisfied with its ability to review and appropriately vet the proprietary software and methods.

[10] Based on review Section 2.4 of the Methodology for each program included in the Report. Percentages do not add to 100% because of other scores that are labeled as not applicable or unknown.
[11] *See* Section 2.4.1 Number 18 of the Methodology, ibr in Commission Order dated February 29, 2024, 22-254 Docket.

Using responses to data requests in the EER dockets as well as work papers associated with the Report, the Bates White analysis focused on the replicability of the Whole Home Efficiency Program energy savings calculations. As noted in their report (see Exhibit 1), Bates White concluded they could not replicate the kWh energy savings calculations, nor could they replicate peak demand reduction savings.

Based on Staff's review of the PY1 EM&V and the Bates White findings, Staff further concludes Evergy Kansas Central was unable to adhere to the Commission's requirement to use NMEC or meter-based data in every instance where it is feasible and cost-effective. While the plan contained in the Commission's Order projected that NMEC analysis or metered data would be used for 94.4% of the total savings[12], the EM&V PY1 Report states the program was only able to verify 62.8% of the savings through NMEC for the 2024 results.

For those energy savings calculations that did not use NMEC or AMI meter data, Evergy Kansas Central used some version of the TRM that was included in the original 22-254 Application.[13] In an attempt to provide more precise savings calculations without measuring the savings, Evergy adjusted the TRM to reflect known parameters in what are referred to as "engineering-based calculated savings". For example, for the measures that involved upgrades to lighting, Evergy adjusted the TRM to reflect data collected for two to four weeks from lighting loggers and used that data to adjust the estimated savings.[14] Table 7, shown below, provides a sense as to the accuracy of the TRM when compared to NMEC. In this case, the realization rate[15], which can be loosely defined as the ratio of TRM forecasted savings to NMEC calculated savings, appears to vary inversely with NMEC verified savings for the residential programs. In other words, residential program savings tend to be lower when using NMEC than when calculated using TRM based measures. Because demand response calculations depend on an accurate kWh savings calculation, it is possible the home demand response realization rate also was indirectly influenced by TRM calculations even though NMEC was used to determine demand savings.

[12] *See* Table 1: EM&V Utilization of NMEC and/or AMI Data per KEEIA Program, Commission Order dated February 29, 2024.
[13] *See* discussion on Standard for Verification found in Sections 1.3.1.4; 1.3.1.5; D.3.1; and E.3 of the Report.
[14] *See* Exhibit 3.
[15] Defined in Section 2.4.1 as the relationship between calculated values versus what they were originally forecasted to be. Staff understands the forecasted rates were based on the TRM while the calculate rates were based on NMEC if it was available.

Table 7: Program Planned and Actual Percentage of NMEC Utilized by Jurisdiction – PY1[16]

Jurisdiction	Sector	Program	Planned % of NMEC Analyses and/or Utilizing AMI Data[1]	NMEC Verified Savings	Total Verified Savings	Actual % of NMEC Analyses and/or Utilizing AMI Data
Kansas Central	Residential Programs	Whole Home Efficiency	92.7%	1,532,893	1,532,893	100.0%
		Hard-to-Reach Homes	81.0%	184,131	3,491,415	5.3%
		Home Energy Education	100.0%	589,077	589,077	100.0%
		Home Demand Response	100.0%	493,210	493,210	100.0%
		Residential Programs Subtotal	**92.6%**	**2,799,311**	**6,106,595**	**45.8%**
	Business Programs	Whole Business Efficiency	95.9%	1,719,695	2,209,915	77.8%
		Hard-to-Reach Businesses	92.6%	2,895,548	3,288,102	88.1%
		Business Demand Response[2]	100.0%	0	0	100.0%
		Business Programs Subtotal	**95.2%**	**4,615,243**	**5,498,017**	**83.9%**
Kansas Metro	Residential Programs	Whole Home Efficiency	92.7%	1,813,246	1,813,246	100.0%
		Hard-to-Reach Homes	81.0%	33,153	479,883	6.9%
		Home Energy Education	100.0%	238,612	238,612	100.0%
		Home Demand Response	100.0%	152,810	152,810	100.0%
		Residential Programs Subtotal	**92.6%**	**2,237,821**	**2,684,551**	**83.4%**
	Business Programs	Whole Business Efficiency	95.9%	1,018,454	2,977,033	34.2%
		Hard-to-Reach Businesses	92.6%	444,093	643,357	69.0%
		Business Demand Response[2]	100.0%	0	0	100.0%
		Business Programs Subtotal	**95.2%**	**1,462,547**	**3,620,390**	**40.4%**
Portfolio Total			**94.4%**	**11,114,922**	**17,909,553**	**62.1%**

[1] Planned NMEC percentages were developed at the utility level.
[2] The Business Demand Response Program did not claim energy savings in PY1 (only peak demand reduction).

As noted above, the Methodology allows the use of TRM deemed or partially deemed savings in the savings analysis, provided that the analysis that is used documents and explains why energy savings from a particular measure were unable to comply with NMEC standards and exactly how the use of the non-NMEC standard varies from NMEC Rulebook.[17] The PY1 EM&V Report somewhat addresses this discrepancy by listing measure categories for which TRM was used. [18] However, the Methodology specifically requires an explanation of the variance from the agreed measurement methodology ***for each*** measure where NMEC is not followed, and that level of detail is not included in the report or workpapers that were provided to Staff. In response to a Staff data request, the EM&V consultant indicates there may have been insufficient time to analyze meter-based utility bills for post installation periods at least for a portion of the measures.[19] In another response, the EM&V consultant provided rationale as to why NMEC based savings were not feasible in many cases.[20] However, Staff finds the lack of rationale justifying why NMEC was not utilized in many cases in the EM&V report itself, and the subsequent rationale by the EM&V consultant through discovery, insufficient to justify deviating from the NMEC requirements.

Similar to Staff's position that compliance with the Commission approved EM&V methodology is fundamental to completing the EER calculation, Staff contends that stringent quality assurance/quality control (QA/QC) requirements throughout the implementation of the various

[16] *See* Exhibit 3.
[17] EM&V Plan Section 2.7
[18] *See* Section 1.3.1 and Table 4-1 of the Report.
[19] *See* Exhibit 3.
[20] *See* Response to DR 8.

programs are fundamental to ensuring the EM&V process has accurate and transparent data to audit and evaluate. Staff notes the Methodology did not establish minimum requirements for QA/QC; however, the EM&V PY1 Report references QC in the whole home efficiency and hard to reach home programs several times as needing QC improvements in future project years.[21]

The Report appears satisfied with the QC process in the business programs[22] stating:

> The program has established internal QA/QC procedures; no significant issues were identified in PY1. The implementation team conducts on-site inspections for all projects that require pre-approval and 10 percent of "fast track" projects under $15,000.

However, the Report then goes on to include several recommendations for improvements of business programs that indicate to Staff there was at least a moderate deficiency of quality assurance. One such recommendation states:

> …By specifying exact locations where measures are installed, it becomes easier to track and monitor their performance. This helps in identifying any issues or inefficiencies quickly. Accurate location data ensures that the evaluation is based on precise and reliable information, leading to more accurate results. Specific locations allow evaluators to verify that the measures have been installed correctly and are functioning as intended.[23]

This statement implies to Staff that the accuracy of data was affected by inadequate location information. QA improvements, such as tracking the exact location of measures, are necessary to improve the accuracy of results and ultimately calculate an accurate EER. Staff also notes the implementers for the business programs appear to rely heavily on customer applications to determine the type of equipment being replaced rather than performing site visits or documenting existing conditions with photographs. Staff also contend that conducting onsite reviews of only 10% of the post-installation projects that cost less than $15,000 is insufficient to ensure installations are documented and completed correctly. Staff contends that a rigorous QA/QC program is the lynchpin to the entire EM&V process and subsequent EER calculation. Without proper quality control and documentation of the installed measures, savings calculations are called into question regardless of the TRM or NMEC methodology used for the calculation. To follow up on what we perceive as shortcomings to the EM&V Report, Staff intends to file a more extensive Report and Recommendation in the 22-254 Docket regarding the PY1 Report.

Staff recognizes the time limitations for this first year of the KEEIA may have limited Evergy Kansas Central's ability to use NMEC, but we do not believe noncompliance with the Commission's Order should be allowed in Evergy Kansas Central earnings opportunities that will be paid by ratepayers despite time limitations. Our review of the Report demonstrates Evergy Kansas Central has not provided sufficient information or data to allow Staff to replicate the savings results. Evergy Kansas Central has also failed to apply NMEC analysis to savings calculations at the minimum level prescribed by the Commission Order. Therefore, Staff recommends the Commission not allow recovery of the TD or EO in the EER Dockets for any PY1 programs where the savings calculations cannot be replicated. Alternatively, if the

[21] *See* Sections 3.5.2.1; 3.5.2.2; and A.1.2
[22] *See* Section D.9.5
[23] *See* Section D.10, page 266.

Commission finds sufficient transparency, Staff recommends the Commission not allow recovery of the TD for any PY1 programs where NMEC analysis was not used to meet prescribed minimums for program savings calculations. As noted above, both of these compliance issues may be related to year 1 startup problems. Assuming sufficient data is available to replicate the savings calculations, and minimum NMEC analysis criteria are met, Staff believes it may be appropriate to allow the PY1 TD to be recovered in the PY2 EER filings.

Earnings Opportunity Awards

Evergy Kansas Central is requesting to recover a total of $1,083,849 related to EO costs, including $658,551 for residential customers and $425,298 for non-residential customers.

Hard-to-Reach Businesses
From the EM&V report, Evergy Kansas Central reported net verified savings of 3,057,935 kWh. The annual incentive amount is calculated by multiplying verified MWh savings by a rate of $23.21 per MWh. Therefore, the total incentive amount requested to be recovered for this program is $70,975.

Hard-to-Reach Homes
From the EM&V report, Evergy Kansas Central reported net verified savings of 3,491,415 kWh. The annual incentive amount is calculated by multiplying these savings by a rate of $25.88 per MWh for a total requested incentive amount of $90,358.

Business Energy Education
Since this program did not achieve the metrics Evergy Kansas Central was required to, it did not request any annual incentive amount.

Home Energy Education
Like the Business Energy Education program, Evergy Kansas Central did not achieve its metric goals and therefore did not request recovery of any incentive amount.

Business Demand Response
From the EM&V report, Evergy Kansas Central reported net verified demand reduction of 10,888 kW. The annual incentive amount is calculated by multiplying the kW reduction by a rate of $26,190 per MW. This total annual requested incentive amounts to $285,163.

Home Demand Response
From the EM&V report, Evergy Kansas Central reported net verified savings of 493,210 kWh and net verified demand reduction of 17,822 kW. The kWh savings are multiplied by a rate of $21.69 per MWh and the kW reductions are multiplied by a rate of $26,190 per MW; these annual incentive amounts calculate to $10,698 for MWh savings and $466,757 for MW savings for a total requested incentive amount of $477,455.

Whole Business Efficiency
From the EM&V report, Evergy Kansas Central reported net verified savings of 2,143,617 kWh and net verified demand reduction of 249 kW. The kWh savings are multiplied by a rate of $21.69 per MWh and the kW reductions are multiplied by a rate of $91,094 per MW. Therefore, the annual

incentive amount requested for kWh savings calculates to $46,495 and kW savings to $22,666; resulting in a requested total incentive amount of $69,161.

Whole Home Efficiency
From the EM&V report, Evergy Kansas Central reported net verified savings in kWh of 1,126,992 and in kW of 728. The kWh savings are multiplied by a rate of $21.69 per MWh and the kW reductions are multiplied by a rate of $91,094 per MW. The annual incentive amount requested to recover for kWh savings is $24,444.46 and $66,294.37 for kW reductions, for a total requested recovery of $90,739.

As Staff previously stated, a transparent, accurate, and complete EM&V for PY1 is crucial to providing a recommendation in this Docket, because the claimed savings provide the basis for the EO and TD calculations. In other words, any error in claimed savings will result in inaccurate values for the EER to be collected from the ratepayers. As discussed in the TD section above, Staff's review of the Report demonstrates Evergy Kansas Central has not provided sufficient information or data to allow Staff to replicate the savings results. Evergy Kansas Central has also failed to apply NMEC analysis to savings calculations at the minimum level prescribed by the Commission Order.

Staff recommends the Commission disallow recovery of the EO for any PY1 programs where the savings calculations cannot be replicated. Alternatively, if the Commission finds sufficient transparency, Staff recommends the Commission not allow recovery of the TD for any PY1 programs where NMEC analysis was not used to meet prescribed minimums for program savings calculations. Assuming sufficient data is available to replicate the savings calculations and minimum NMEC analysis criteria are met, Staff believes it may be appropriate to allow the PY1 EO to be recovered in the PY2 EER filings.

Energy Efficiency Demand Response

Evergy Kansas Central is requesting to recover a total of $2,148,784 related to EEDR costs, including $758,151 for residential customers and $1,390,633 for non-residential customers. Staff finds the level of these costs reflected in the proposed EER rate calculation to be reasonable and accurate and has confirmed that the costs were properly recorded by Evergy Kansas Central for the period of July 2024 through December 2024.

Similar to the budget analysis conducted for the program costs discussed above, Staff examined the annual expenditure related to the EEDR included in the current filing compared to the respective annual budget. Since the EEDR expenditures related to the period of January 2024 through June 2024 were included for recovery in the 25-080 Docket, Staff has prorated the budget for the remaining six month of the year reflected in the current filing based on a monthly budget average.

Table 8: EEDR Budget vs. Actual Comparison

Description	Amount
Annual Budget	$3,926,112
Monthly Average	$327,176
Prorated Budget (6-month period)	$1,963,056
July 2024-December 2024	$2,148,784
Overage	($185,728)

As shown, Evergy Kansas Central's expenditures for its EEDR exceeded the prorated level of their annual program budget amount by approximately 9.4%. In the Order for the Commission's general investigation in Docket No. 08-GIMX-442-GIV ("08-442 Docket"), the Commission and stakeholders contemplated a threshold to offer utilities flexibility in the budget process. In its findings, the Commission stated:

> …granting a utility flexibility to adjust a program's budget up to 10%, based on the program's initial budget (or subsequent budget approved by the Commission in a two-year review or other proceeding) is appropriate as it should permit utilities to more quickly adjust to changing circumstances.[24]

Therefore, since Evergy Kansas Central is within the 10% threshold, Staff concludes that the EEDR expenditures should be approved for recovery.

True-Up

Evergy Kansas Central is requesting the recovery of annual true-up costs related to the under collection of costs resulting from the 25-080 Docket totaling $71,604, including $15,086 to be recovered from residential customers and $56,518 to be recovered from non-residential customers. As per 25-080 Docket, Evergy is allowed to recover True-Up costs for the recovery period of July 2024 to December 2024. Staff has reviewed the true-up calculation and finds the requested amount accurately reflects the difference between the approved recovery amount resulting from the 25-080 Docket and the actual recovery amount.

Staff's review of the True-Up consisted of two parts. First, Staff verifying the amounts for the cost components based upon the prior amount approved for recovery in the 25-080 Docket filing. Staff accessed the workpapers filed in the 25-080 Docket, as well as the respective Commission Order approving the requested EER, published on the Commission website. While these costs were reviewed using the same review process as described above for the 2024 expenditures, Staff's review in this docket ensures errors were not inadvertently overlooked in the previous audit, information remained the same, and that there was no prior-year correction to be made. Second, Staff verified the total offsetting revenue component of the true-up by verifying the accuracy of the EE factor rates effective during the prior recovery period and then utilized the rates to calculate the appropriate amount for the six-month period of July 2024 through December 2024.

[24] *Commission Order*, 08-442 Docket, ¶ 181 (Date).

Projected Energy

Evergy Kansas Central forecasted 6,786,236,889 kWh for residential customers and 13,872,938,388 kWh for non-residential customers, for a total of 20,659,175,277 kWh.

Staff evaluated the Evergy Kansas Central forecasts by (1) developing its own models and comparing the forecasts with Evergy Kansas Central's forecasts, and (2) using an in-sample assessment of Evergy Kansas Central's forecast of customer count with actual customer count data.

First, Staff developed multiple, simple time series models for estimating customer count and weather normalization models for estimating average customer usage. Then Staff used these models to forecast customer count and average customer usage and then multiplying them together to give a forecast of total customer energy usage—total kWh. Staff's forecasts were close to Evergy Kansas Central's forecasts.

Second, Staff had actual Residential customer count data for an additional nine months after Evergy Kansas Central's estimation period and compared Evergy Kansas Central's forecasted customer count with actual customer count—an out of sample test of forecast accuracy. For Central North and Central South, Evergy Kansas Central's model was accurate enough to be reasonable. In all cases Evergy Kansas Central's forecasts were reasonable.

Evergy Kansas Central developed the anticipated energy estimates using a hybrid forecasting approach with the primary drivers being the energy usage for cooling, heating, and base load variables. The hybrid approach combines engineering-based estimates of energy consumption with statistical estimates to produce kWh forecasts.

The statistical forecasts start by using a regression equation that has heating and cooling temperature variables, and then adds structural variables such as income along with autoregressive moving average (ARMA) terms are added to the regression equation. The estimated equation is used to forecast future customer counts and customer energy usage. Forecasts for income and other structural variables along with average heating and cooling temperature variables are used to forecast future number of customers and total energy usage.

The engineering-based estimates begin with Evergy Kansas Central's appliance saturation survey and then uses the Energy Information Agency's end-use energy forecasts for customer use of air conditioning and refrigeration among other appliances. Evergy Kansas Central also uses the EPRI electric vehicle forecast. The statistical forecast is then adjusted for the effect of demand side management programs, electric vehicle expected usage and expect installation of solar in residential and commercial buildings. Finally, there is an administrative adjustment based on known changes within the service territory within the near future.

Because the statistical model and the engineering and administrative adjustments are reasonable, Staff recommends accepting Evergy Kansas Central's forecasted energy usage for the calculation of the EER rate.

RECOMMENDATION:

Staff recommends the Commission approve Staff's revised KEEIA EER amount of $11,421,206, including $5,727,906 to be collected from residential customers and $5,693,300 to be collected from non-residential customers, with the following conditions:

1. Evergy Kansas Central shall file its next KEEIA EER in June 2026, to include costs incurred from Commission-approved programs from May 1, 2025, through April 30, 2026. In this filing Evergy Kansas Central shall also include a true-up calculation to include the amounts collected from October 1, 2025, to September 30, 2026, versus the amounts intended to be collected during that time period.
2. Evergy Kansas Central shall conduct quarterly meetings to allow Staff the opportunity to ask questions, evaluate program metrics, provide feedback, and to continue to refine TRM standards going forward to identify the standards used to evaluate future program years.
3. Staff recommends denial of the TD and EO costs in the instant docket. However, should the Commission determine the TD and EO incentives related to Plan Year 1 should be recovered in Plan Year 2, Staff recommends Evergy Kansas Central be required to provide sufficient data to allow Staff to replicate the savings calculations and minimum NMEC analysis criteria necessary to evaluate whether the criteria met.

Bates White Analysis

****CONFIDENTIAL****

#	Whole Home Efficiency Program	Score	Comment 1	Comment 2	Comment 3
1	Description of the program target population and participant eligibility criteria.	**Needs Improvement**	No information in EM&V regarding participant eligibility criteria.	Target population is not explicitly described.	
2	Description of incentive structure, including which entity receives compensation at each stage of the project, and methods/tools used to calculate incentives or compensation.	**Unsatisfactory**	No description in EM&V of incentive structure specifically regarding which entity receives compensation at each stage of the project.	Lacks thorough description of methods/tools used to calculate incentives or compensation.	
3	Detailed documentation and supporting work papers for expected costs, baseline, baseline period (e.g., the 12-month period immediately preceding intervention), energy savings, peak impacts, and effective useful life (EUL) of planned measures and intervention strategies; also describe how project-level EUL will be calculated.	**Needs Improvement**	No mention of effective useful life (EUL) of planned measures. No descriptions of, or calculations of the project-level EUL.		
4	Description of methodology, analytical methods, and software employed for calculating NMEC, gross savings, and net savings resulting from the energy efficiency measures installed and not influenced by unrelated changes in energy consumption.	**Unknown**	EM&V Table 4-1, 100.0% NMEC Verified Savings for WHE Program. However, Staff can not verify accuracy of the 100% Verified Savings value.	EM&V Paragraph A.2.3.3 and Paragraph A.3.1.1 discuss "Energy Savings Calculation" and "Gross Energy Savings and Demand Reduction, respectively."	**NMEC Concerns:** Staff notes that in Paragraph A.4.2, it is stated that "While savings differ on a measure-by-measure basis, the results from the usage regression analyses showed greater energy savings and slightly lower demand savings for the program overall..." when compared to engineering analysis.
5	Description of methodology must address weather normalization, calculation of hourly load shape impacts, and other factors including adjustments for non-routine events.	**Needs Improvement**	EM&V Paragraph A.2.2 notes that "monitoring results were normalized using local weather station data and extrapolated onto a typical meteorological year (TMY) to develop a yearly cooling and heating EFLH value." EFLH being defined as an equivalent full-load hour.	However, the on-site monitoring study was only applied to a sample of projects (51 central air conditioners and 28 air source heat pumps), EM&V Paragraph A.2.2. This represents a minority of the 1243 unique projects in the program, EM&V Paragraph A.2.2.1	EM&V Paragraph A.2.3.2 discusses how independent Heating Degree Hours (HDH) and Cooling Degree Hours(CDH) for weather was included in the model.
6	Detailed Sampling Plan.	**Satisfactory**	EM&V Paragraph A.2.1		
7	For any program design targeting large treatment groups, the M&V Plan must provide a detailed explanation of the selection process for treatment and representative control groups; this requirement also applies to Randomized Controlled Trials (RCTs).	**Unsatisfactory**	Staff can not find any explanation of the selection process for treatment and representative control groups for the WHE Program.	EM&V Paragraph A.2.2.1 notes 1243 unique projects in the program through November 2024	
8	Detailed Data Collection Plan, including description of monitoring activities for each energy efficiency measure category that is expected to be implemented and sampled; data collection includes all AMI data, metered data, sub-metered data, building energy management system data, and logger data.	**Needs Improvement**	EM&V Paragraph A.2.2, ADM deployed current transducers onto the HVAC units, utilized motor on/off loggers on compressor motors. However detailed data collection for Building shells and Duct Repair and Sealing are not described.		
9	Description of methods of determining program influence through detailed data collection and analysis	**Satisfactory**	EM&V Paragraph A.2.2.1, A.2.2.2, participant and contractor surveys were conducted.	EM&V Paragraph A.3 discusses Impact Evaluation Results.	

#	Whole Home Efficiency Program	Score	Comment 1	Comment 2	Comment 3
10	For programs or projects that target savings less than ten percent of annual consumption, a detailed description of rationale and methods for distinguishing savings from normal variations in consumption.	**Unsatisfactory**	Staff can not determine if program savings are less than ten percent of annual consumption.	If program target savings are assumed to be less than ten percent of annual consumption. There is no detailed description of rationale and methods for distinguishing savings from normal variations in consumption.	
11	If targeting to-code savings, a detailed description of the following. • Identify the specific code that is targeted. • Specify the equipment types, building types, geographical locations, and/or customer segments that will provide cost-effective to-code savings. • Describe the specific barriers that are preventing code-compliant equipment replacements. • Describe the reasons that natural turnover is inadequate for certain markets or technologies. • Explain program interventions that would effectively accelerate equipment turnover.	**Unsatisfactory**	No descriptions of the following: • Identify the specific code that is targeted. • Specify the equipment types, building types, geographical locations, and/or customer segments that will provide cost-effective to-code savings. • Describe the specific barriers that are preventing code-compliant equipment replacements. • Describe the reasons that natural turnover is inadequate for certain markets or technologies. • Explain program interventions that would effectively accelerate equipment turnover.		
12	Any Bid M&V Plan submitted by third-party implementers in their bids (at minimum, must include above-listed items 1, 3, 4, 5, and 8).	**Unknown**	Staff can not find any bid M&V plans provided by third-party implementers for this program.		
13	Detailed description of the timing of real-time M&V activities, including M&V schedules that will enable Evergy to use ex-post verified savings (as determined by the independent EM&V contractor) to determine a significant portion of customer and implementer incentives	**Unsatisfactory**	Staff could not find detailed descriptions of the timing of real-time M&V activities, including M&V schedules and implementer incentives		
14	Methods to account for interactive effects for participants in multiple programs, i.e., ensure that there is no double counting of reported savings.	**Unsatisfactory**	EM&V Paragraph 5.3 notes that "ADM investigated participant spillover through its Whole Home, Whole Business Efficiency, and Hard-to-Reach Businesses participant surveys"		
15	Methods for calculating cost effectiveness.	**Satisfactory**	EM&V Paragraph 3.4, methods informed by California Standard Practice Manual.	https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_public_website/content/utilities_and_industries/energy_-_electricity_and_natural_gas/cpuc-standard-practice-manual.pdf	
16	Detailed description of M&V schedules, including a timeline for all activities, the frequency of M&V review/input to ensure adherence to the real-time M&V approach, specific real-time M&V milestones throughout the program year, and M&V reporting schedules and deadlines	**Unsatisfactory**	Staff could not find detailed descriptions of M&V schedules, including a timeline for all activities, the frequency of M&V review/input to ensure adherence to the real-time M&V approach, specific real-time M&V milestones throughout the program year, and M&V reporting schedules and deadlines in the EM&V.		

#	Whole Home Efficiency Program	Score	Comment 1	Comment 2	Comment 3
17	Any other information required by the Commission, including (but not limited to) description of program compliance with the Commission approved Stipulations and the Commission Order in Docket 22-EKME-254-TAR.	**Unsatisfactory**	No description of program compliance with the Commission approved Stipulations and Commission Order in Docket 22-EKME-254-TAR.		
18	M&V Plans must describe M&V transparency, which must include (but is not limited to) discussion of the following components of transparency. • To demonstrate the replicability of savings calculations, the Commission will be provided all analytical methods, work papers, and data, including M&V spreadsheets, R code, explanatory presentations (e.g., workshop presentations and tutorials), and supporting files, references, and literature.	**Unsatisfactory**	Staff is unable to replicate the savings calculations conducted by ADM.		

#	Hard-to-Reach Homes Program	Score	Comment 1	Comment 2	Comment 3
1	Description of the program target population and participant eligibility criteria.	**Needs Improvement**	EM&V Paragraph B.1 notes that the program provides home upgrades for multi-family residences, weatherization home upgrades, foodbank giveaways, energy assessments and energy savings kits for income eligible customers. However specific eligibility criteria is not explicitly described.	Target population is not explicitly described.	
2	Description of incentive structure, including which entity receives compensation at each stage of the project, and methods/tools used to calculate incentives or compensation.	**Unsatisfactory**	No description in EM&V of incentive structure specifically regarding which entity receives compensation at each stage of the project.	Lacks thorough description of methods/tools used to calculate incentives or compensation.	
3	Detailed documentation and supporting work papers for expected costs, baseline, baseline period (e.g., the 12-month period immediately preceding intervention), energy savings, peak impacts, and effective useful life (EUL) of planned measures and intervention strategies; also describe how project-level EUL will be calculated.	**Needs Improvement**	No mention of effective useful life (EUL) of planned measures. No descriptions of, or calculations of the project-level EUL.		
4	Description of methodology, analytical methods, and software employed for calculating NMEC, gross savings, and net savings resulting from the energy efficiency measures installed and not influenced by unrelated changes in energy consumption.	**Unsatisfactory**	EM&V Table 4-1, 6.0% NMEC Verified Savings for HRH Program, less than 90.0% NMEC Verified Savings.	EM&V Paragraph 1.3.1.2, in reference to the Community Energy Efficiency Kits, Energy Savings Kits, and Income Eligible Multi-Family that "*ADM primarily relied on the Kansas Technical Reference Manual (TRM) for algorithms and deemed inputs to calculate measure savings,* which includes industry standard algorithms for an engineering review of the program measures." (Emphasis added)	
5	Description of methodology must address weather normalization, calculation of hourly load shape impacts, and other factors including adjustments for non-routine events.	**Unsatisfactory**	Staff could not find descriptions of methodology in the EM&V addressing weather normalization for the HRH Program.		
6	Detailed Sampling Plan.	**Unsatisfactory**	No Sampling Plan Provided in the EM&V		
7	For any program design targeting large treatment groups, the M&V Plan must provide a detailed explanation of the selection process for treatment and representative control groups; this requirement also applies to Randomized Controlled Trials (RCTs).	**Unsatisfactory**	Staff can not find any explanation of the selection process for treatment and representative control groups for the HRH Program.	EM&V Table B-2 notes that PY1 had a total of 18,283 Number of Participants/Kits.	
8	Detailed Data Collection Plan, including description of monitoring activities for each energy efficiency measure category that is expected to be implemented and sampled; data collection includes all AMI data, metered data, sub-metered data, building energy management system data, and logger data.	**Unsatisfactory**	EM&V Paragraph 1.3.1.2, in reference to the Community Energy Efficiency Kits, Energy Savings Kits, and Income Eligible Multi-Family that "*ADM primarily relied on the Kansas Technical Reference Manual (TRM) for algorithms and deemed inputs to calculate measure savings,* which includes industry standard algorithms for an engineering review of the program measures." (Emphasis added)	EM&V Paragraph 1.3.1.2, "**Weatherization Assistance:** In the evaluation of the Weatherization Assistance Program, energy savings and peak demand reductions were estimated using regression analyses consisting of population-level NMEC in which energy savings were determined using an NMEC approach based on pre- and post-installation AMI data..."	

#	Hard-to-Reach Homes Program	Score	Comment 1	Comment 2	Comment 3
9	Description of methods of determining program influence through detailed data collection and analysis	**Unsatisfactory**	EM&V Paragraph 1.3.1.2, in reference to the Community Energy Efficiency Kits, Energy Savings Kits, and Income Eligible Multi-Family that "*ADM primarily relied on the Kansas Technical Reference Manual (TRM) for algorithms and deemed inputs to calculate measure savings,* which includes industry standard algorithms for an engineering review of the program measures." (Emphasis added)	EM&V Paragraph B 3.2.3, notes discrepancies between the TRM and reported values	
10	For programs or projects that target savings less than ten percent of annual consumption, a detailed description of rationale and methods for distinguishing savings from normal variations in consumption.	**Unknown**	Staff can not determine if program savings are less than ten percent of annual consumption.		
11	If targeting to-code savings, a detailed description of the following. • Identify the specific code that is targeted. • Specify the equipment types, building types, geographical locations, and/or customer segments that will provide cost-effective to-code savings. • Describe the specific barriers that are preventing code-compliant equipment replacements. • Describe the reasons that natural turnover is inadequate for certain markets or technologies. • Explain program interventions that would effectively accelerate equipment turnover	**N/A**	Not targeting to-code savings.		
12	Any Bid M&V Plan submitted by third-party implementers in their bids (at minimum, must include above-listed items 1, 3, 4, 5, and 8).	**Unknown**	Staff can not find any bid M&V plans provided by third-party implementers for this program.		
13	Detailed description of the timing of real-time M&V activities, including M&V schedules that will enable Evergy to use ex-post verified savings (as determined by the independent EM&V contractor) to determine a significant portion of customer and implementer incentives	**Unsatisfactory**	Staff could not find detailed descriptions of the timing of real-time M&V activities, including M&V schedules and implementer incentives		
14	Methods to account for interactive effects for participants in multiple programs, i.e., ensure that there is no double counting of reported savings.	**Unsatisfactory**	Staff can not find this information in the EM&V for the HRH program. EM&V Paragraph 5.3 notes that "ADM investigated participant spillover through its Whole Home, Whole Business Efficiency, and Hard-to-Reach Businesses participant surveys"	EM&V Table B-12, Smart Thermostats appear in this table. However there is no confirmation that the savings from this program are not double counted in the Home Demand Response Program.	
15	Methods for calculating cost effectiveness.	**Satisfactory**	EM&V Paragraph 3.4, methods informed by California Standard Practice Manual.	https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_public_website/content/utilities_and_industries/energy_-_electricity_and_natural_gas/cpuc-standard-practice-manual.pdf	

#	Hard-to-Reach Homes Program	Score	Comment 1	Comment 2	Comment 3
16	Detailed description of M&V schedules, including a timeline for all activities, the frequency of M&V review/input to ensure adherence to the real-time M&V approach, specific real-time M&V milestones throughout the program year, and M&V reporting schedules and deadlines	**Unsatisfactory**	Staff could not find detailed descriptions of M&V schedules, including a timeline for all activities, the frequency of M&V review/input to ensure adherence to the real-time M&V approach, specific real-time M&V milestones throughout the program year, and M&V reporting schedules and deadlines in the EM&V.		
17	Any other information required by the Commission, including (but not limited to) description of program compliance with the Commission approved Stipulations and the Commission Order in Docket 22-EKME-254-TAR.	**Unsatisfactory**	No description of program compliance with the Commission approved Stipulations and Commission Order in Docket 22-EKME-254-TAR.		
18	M&V Plans must describe M&V transparency, which must include (but is not limited to) discussion of the following components of transparency. • To demonstrate the replicability of savings calculations, the Commission will be provided all analytical methods, work papers, and data, including M&V spreadsheets, R code, explanatory presentations (e.g., workshop presentations and tutorials), and supporting files, references, and literature.	**Unsatisfactory**	Staff is unable to replicate the savings calculations conducted by ADM.	Staff can not confirm the accuracy of the savings stated and notes several cases for concern. EM&V B.3.2.3 "*Window Film Kits:* The energy savings for Window Film Kits have a realization rate of 3 percent, and the demand savings have a realization rate of 100 percent. The significant discrepancy in the energy savings realization rate was *caused by the reported savings calculation erroneously multiplying the unit savings by the quantity twice."* (Emphasis Added). The same error was also preformed on the Weatherization Strips Measure.	EM&V B.3.2.3 "*LED Bulbs:* The energy savings for LED Bulbs have a *realization rate of 180 percent* , and the demand savings have a realization rate of 107 percent. The energy savings realization rate was primarily affected by a *difference in Hours of Use applied* between reported and verified gross savings..." (Emphasis Added)

#	Home Energy Education Program	Score	Comment 1	Comment 2	Comment 3
1	Description of the program target population and participant eligibility criteria.	**Needs Improvement**	No information in EM&V regarding participant eligibility criteria.	Target population is not explicitly described.	
2	Description of incentive structure, including which entity receives compensation at each stage of the project, and methods/tools used to calculate incentives or compensation.	**Unsatisfactory**	No description in EM&V of incentive structure specifically regarding which entity receives compensation at each stage of the project.	Lacks thorough description of methods/tools used to calculate incentives or compensation.	
3	Detailed documentation and supporting work papers for expected costs, baseline, baseline period (e.g., the 12-month period immediately preceding intervention), energy savings, peak impacts, and effective useful life (EUL) of planned measures and intervention strategies; also describe how project-level EUL will be calculated.	**Needs Improvement**	No mention of effective useful life (EUL) of planned measures. No descriptions of, or calculations of the project-level EUL.		
4	Description of methodology, analytical methods, and software employed for calculating NMEC, gross savings, and net savings resulting from the energy efficiency measures installed and not influenced by unrelated changes in energy consumption.	**Needs Improvement**	EM&V Table 4-1, 100.0% NMEC Verified Savings for HEE Program. However, Staff can not verify accuracy of the 100% Verified Savings value.		
5	Description of methodology must address weather normalization, calculation of hourly load shape impacts, and other factors including adjustments for non-routine events.	**Satisfactory**	EM&V Paragraph C.3.4,		
6	Detailed Sampling Plan.	**Unsatisfactory**	No Sampling Plan Provided in the EM&V		
7	For any program design targeting large treatment groups, the M&V Plan must provide a detailed explanation of the selection process for treatment and representative control groups; this requirement also applies to Randomized Controlled Trials (RCTs).	**Satisfactory**	EM&V Paragraph C.2, "The methods detailed in the Uniform Methods Project (UMP) behavioral chapter by the National Renewable Energy Laboratory were followed for this evaluation."	https://docs.nrel.gov/docs/fy18osti/70472.pdf	
8	Detailed Data Collection Plan, including description of monitoring activities for each energy efficiency measure category that is expected to be implemented and sampled; data collection includes all AMI data, metered data, sub-metered data, building energy management system data, and logger data.	**Satisfactory**	EM&V Paragraph C.2 "Pre-treatment and post-treatment AMI data for participants and non-participants. The data started on April 1, 2023, and ended on February 28,2025, with the start date depending on when customers were added to program cohorts.		
9	Description of methods of determining program influence through detailed data collection and analysis	**Satisfactory**	EM&V Paragraph C.2, "The methods detailed in the Uniform Methods Project (UMP) behavioral chapter by the National Renewable Energy Laboratory were followed for this evaluation."	https://docs.nrel.gov/docs/fy18osti/70472.pdf	
10	For programs or projects that target savings less than ten percent of annual consumption, a detailed description of rationale and methods for distinguishing savings from normal variations in consumption.	**Satisfactory**	EM&V Paragraph C.3 notes methods taken from the UMP to consider any small systematic differences in pre-treatment usage trends.	https://docs.nrel.gov/docs/fy18osti/70472.pdf	

#	Home Energy Education Program	Score	Comment 1	Comment 2	Comment 3
11	If targeting to-code savings, a detailed description of the following. • Identify the specific code that is targeted. • Specify the equipment types, building types, geographical locations, and/or customer segments that will provide cost-effective to-code savings. • Describe the specific barriers that are preventing code-compliant equipment replacements. • Describe the reasons that natural turnover is inadequate for certain markets or technologies. • Explain program interventions that would effectively accelerate equipment turnover	**N/A**	Not targeting to-code savings.		
12	Any Bid M&V Plan submitted by third-party implementers in their bids (at minimum, must include above-listed items 1, 3, 4, 5, and 8).	**Unknown**	Staff can not find any bid M&V plans provided by third-party implementers for this program.		
13	Detailed description of the timing of real-time M&V activities, including M&V schedules that will enable Evergy to use ex-post verified savings (as determined by the independent EM&V contractor) to determine a significant portion of customer and implementer incentives	**Unsatisfactory**	Staff could not find detailed descriptions of the timing of real-time M&V activities, including M&V schedules and implementer incentives		
14	Methods to account for interactive effects for participants in multiple programs, i.e., ensure that there is no double counting of reported savings.	**Satisfactory**	EM&V Paragraphs C.3.9-10		
15	Methods for calculating cost effectiveness.	**Satisfactory**	EM&V Paragraph 3.4, methods informed by California Standard Practice Manual.	https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_public_website/content/utilities_and_industries/energy_-_electricity_and_natural_gas/cpuc-standard-practice-manual.pdf	
16	Detailed description of M&V schedules, including a timeline for all activities, the frequency of M&V review/input to ensure adherence to the real-time M&V approach, specific real-time M&V milestones throughout the program year, and M&V reporting schedules and deadlines	**Unsatisfactory**	Staff could not find detailed descriptions of M&V schedules, including a timeline for all activities, the frequency of M&V review/input to ensure adherence to the real-time M&V approach, specific real-time M&V milestones throughout the program year, and M&V reporting schedules and deadlines in the EM&V.		
17	Any other information required by the Commission, including (but not limited to) description of program compliance with the Commission approved Stipulations and the Commission Order in Docket 22-EKME-254-TAR.	**Unsatisfactory**	No description of program compliance with the Commission approved Stipulations and Commission Order in Docket 22-EKME-254-TAR.		

#	Home Energy Education Program	Score	Comment 1	Comment 2	Comment 3
18	M&V Plans must describe M&V transparency, which must include (but is not limited to) discussion of the following components of transparency. • To demonstrate the replicability of savings calculations, the Commission will be provided all analytical methods, work papers, and data, including M&V spreadsheets, R code, explanatory presentations (e.g., workshop presentations and tutorials), and supporting files, references, and literature.	**Unsatisfactory**	Staff is unable to replicate the savings calculations conducted by ADM.		

#	Whole Business Efficiency Program	Score	Comment 1	Comment 2	Comment 3
1	Description of the program target population and participant eligibility criteria.	**Needs Improvement**	No information in EM&V regarding participant eligibility criteria.	EM&V Table D-2 lists types of businesses/ industries served.	
2	Description of incentive structure, including which entity receives compensation at each stage of the project, and methods/tools used to calculate incentives or compensation.	**Unsatisfactory**	No description in EM&V of incentive structure specifically regarding which entity receives compensation at each stage of the project.	Lacks thorough description of methods/tools used to calculate incentives or compensation.	
3	Detailed documentation and supporting work papers for expected costs, baseline, baseline period (e.g., the 12-month period immediately preceding intervention), energy savings, peak impacts, and effective useful life (EUL) of planned measures and intervention strategies; also describe how project-level EUL will be calculated.	**Needs Improvement**	No mention of effective useful life (EUL) of planned measures. No descriptions of, or calculations of the project-level EUL.		
4	Description of methodology, analytical methods, and software employed for calculating NMEC, gross savings, and net savings resulting from the energy efficiency measures installed and not influenced by unrelated changes in energy consumption.	**Unsatisfactory**	EM&V Table 4-1, 79.0% NMEC Verified Savings for WBE Program, less than 90.0% NMEC Verified Savings.	EM&V Table D-4 lists descriptions of verified savings methodology for sampled projects. However this information is not provided for the remaining unsampled projects.	
5	Description of methodology must address weather normalization, calculation of hourly load shape impacts, and other factors including adjustments for non-routine events.	**Unsatisfactory**	Staff can not find descriptions of methodologies that address weather normalization in the EM&V for the WBE Program.	EM&V D.3.2 notes that "ADM utilized normalized energy savings curves to determine peak demand reduction savings for each participant... Normalized energy savings curves were developed for each sampled project by verifying energy use schedules. *Non-sampled measures were assigned annual load shapes from the IL TRM* ." (Emphasis Added)	
6	Detailed Sampling Plan.	**Satisfactory**	EM&V Paragraph D.2.2		
7	For any program design targeting large treatment groups, the M&V Plan must provide a detailed explanation of the selection process for treatment and representative control groups; this requirement also applies to Randomized Controlled Trials (RCTs).	**Unsatisfactory**	EM&V Paragraph D.2.2, "ADM used a stratified sampling plan to reach the overall target..." However, no selection process for treatment nor representative control groups was utilized.		
8	Detailed Data Collection Plan, including description of monitoring activities for each energy efficiency measure category that is expected to be implemented and sampled; data collection includes all AMI data, metered data, sub-metered data, building energy management system data, and logger data.	**Needs Improvement**	EM&V Paragraph D.2.1 notes data collection for M&V review. ADM performed site visits, installed monitory equipment and interviewed customers to confirm details about projects.	EM&V Paragraph D.3.2 "Normalized energy savings curves were developed for each sampled project by verifying energy use schedules. *Non-sampled measures were assigned annual load shapes from the IL TRM* " (Emphasis Added)	EM&V Table D-4 lists descriptions of verified savings methodology for sampled projects. However this information is not provided for the remaining unsampled projects.
9	Description of methods of determining program influence through detailed data collection and analysis	**Unsatisfactory**	EM&V Paragraph D.3.2 "Normalized energy savings curves were developed for each sampled project by verifying energy use schedules. *Non-sampled measures were assigned annual load shapes from the IL TRM* " (Emphasis Added)	EM&V Table D-4 lists descriptions of verified savings methodology for sampled projects. However this information is not provided for the remaining unsampled projects.	

#	Whole Business Efficiency Program	Score	Comment 1	Comment 2	Comment 3
10	For programs or projects that target savings less than ten percent of annual consumption, a detailed description of rationale and methods for distinguishing savings from normal variations in consumption.	**Unknown**	Staff can not determine if target savings is less than ten percent of annual consumption.		
11	If targeting to-code savings, a detailed description of the following. • Identify the specific code that is targeted. • Specify the equipment types, building types, geographical locations, and/or customer segments that will provide cost-effective to-code savings. • Describe the specific barriers that are preventing code-compliant equipment replacements. • Describe the reasons that natural turnover is inadequate for certain markets or technologies. • Explain program interventions that would effectively accelerate equipment turnover.	**Unsatisfactory**	No descriptions of the following: • Identify the specific code that is targeted. • Specify the equipment types, building types, geographical locations, and/or customer segments that will provide cost-effective to-code savings. • Describe the specific barriers that are preventing code-compliant equipment replacements. • Describe the reasons that natural turnover is inadequate for certain markets or technologies. • Explain program interventions that would effectively accelerate equipment turnover.		
12	Any Bid M&V Plan submitted by third-party implementers in their bids (at minimum, must include above-listed items 1, 3, 4, 5, and 8).	**Unknown**	Staff can not find any bid M&V plans provided by third-party implementers for this program.		
13	Detailed description of the timing of real-time M&V activities, including M&V schedules that will enable Evergy to use ex-post verified savings (as determined by the independent EM&V contractor) to determine a significant portion of customer and implementer incentives	**Unsatisfactory**	Staff could not find detailed descriptions of the timing of real-time M&V activities, including M&V schedules and implementer incentives		
14	Methods to account for interactive effects for participants in multiple programs, i.e., ensure that there is no double counting of reported savings.	**Unsatisfactory**	EM&V Paragraph 5.3 notes that "ADM investigated participant spillover through its Whole Home, Whole Business Efficiency, and Hard-to-Reach Businesses participant surveys" However, Staff can not find information that specifically ensured that there was no double counting of reported savings, other than a statement in Paragraph 5.3 stating that a survey was conducted for the WBE program.		
15	Methods for calculating cost effectiveness.	**Satisfactory**	EM&V Paragraph 3.4, methods informed by California Standard Practice Manual.	https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_public_website/content/utilities_and_industries/energy_-_electricity_and_natural_gas/cpuc-standard-practice-manual.pdf	
16	Detailed description of M&V schedules, including a timeline for all activities, the frequency of M&V review/input to ensure adherence to the real-time M&V approach, specific real-time M&V milestones throughout the program year, and M&V reporting schedules and deadlines	**Unsatisfactory**	Staff could not find detailed descriptions of M&V schedules, including a timeline for all activities, the frequency of M&V review/input to ensure adherence to the real-time M&V approach, specific real-time M&V milestones throughout the program year, and M&V reporting schedules and deadlines in the EM&V.		

#	Whole Business Efficiency Program	Score	Comment 1	Comment 2	Comment 3
17	Any other information required by the Commission, including (but not limited to) description of program compliance with the Commission approved Stipulations and the Commission Order in Docket 22-EKME-254-TAR.	**Unsatisfactory**	No description of program compliance with the Commission approved Stipulations and Commission Order in Docket 22-EKME-254-TAR.		
18	M&V Plans must describe M&V transparency, which must include (but is not limited to) discussion of the following components of transparency. • To demonstrate the replicability of savings calculations, the Commission will be provided all analytical methods, work papers, and data, including M&V spreadsheets, R code, explanatory presentations (e.g., workshop presentations and tutorials), and supporting files, references, and literature.	**Unsatisfactory**	Staff is unable to replicate the savings calculations conducted by ADM.		

#	Hard-to-Reach Businesses Program	Score	Comment 1	Comment 2	Comment 3
1	Description of the program target population and participant eligibility criteria.	**Needs Improvement**	No information in EM&V regarding participant eligibility criteria.	EM&V Paragraph E.1, target population is "small business and nonprofit customers."	
2	Description of incentive structure, including which entity receives compensation at each stage of the project, and methods/tools used to calculate incentives or compensation.	**Unsatisfactory**	No description in EM&V of incentive structure specifically regarding which entity receives compensation at each stage of the project.	Lacks thorough description of methods/tools used to calculate incentives or compensation.	
3	Detailed documentation and supporting work papers for expected costs, baseline, baseline period (e.g., the 12-month period immediately preceding intervention), energy savings, peak impacts, and effective useful life (EUL) of planned measures and intervention strategies; also describe how project-level EUL will be calculated.	**Needs Improvement**	Lifetime Energy Savings shown in EM&V Table E-8. However descriptions of how project-level EUL was calculated is not given.	EM&V Tables 8-10 and 8-11 note Gross Energy Savings and Peak Demand Reductions. Verified Savings Methodology is noted for sampled projects, See EM&V Table E-4. However baseline descriptions for unsampled projects, which account for most of the program, can not be found.	
4	Description of methodology, analytical methods, and software employed for calculating NMEC, gross savings, and net savings resulting from the energy efficiency measures installed and not influenced by unrelated changes in energy consumption.	**Unsatisfactory**	EM&V Table 4-1, 53.0% NMEC Verified Savings for HRB Program, less than 90.0% NMEC Verified Savings.		
5	Description of methodology must address weather normalization, calculation of hourly load shape impacts, and other factors including adjustments for non-routine events.	**Needs Improvement**	EM&V Paragraph E.4 "Sampled sites used normalized energy savings curves from the measured primary data. Non-sampled measures were assigned annual load shapes from the IL TRM." Flat load shapes were assigned to measures with uniform yearly usage. Exterior lightings measures were assigned to an ADM created load shape based on KS sunrise and sunset times. Exterior lighting was assumed to be controlled with a photocell to follow sunrise and sunset times.	Staff can not find descriptions of methodologies that address weather normalization in the EM&V for the HRB Program.	
6	Detailed Sampling Plan.	**Satisfactory**	EM&V Paragraph E.2.2		
7	For any program design targeting large treatment groups, the M&V Plan must provide a detailed explanation of the selection process for treatment and representative control groups; this requirement also applies to Randomized Controlled Trials (RCTs).	**Unsatisfactory**	EM&V Table E-2 Notes 374 total projects. No description regarding how sampled sites were chosen compared to unsampled sights. Program did not utilize treatment and representative control groups.		
8	Detailed Data Collection Plan, including description of monitoring activities for each energy efficiency measure category that is expected to be implemented and sampled; data collection includes all AMI data, metered data, sub-metered data, building energy management system data, and logger data.	**Needs Improvement**	EM&V Paragraph E.2.1 describes Data Collection.	The extent of descriptions of methodologies regarding monitoring activities for each energy efficiency measure is "Program tracking data for M&V review was obtained from the energy database."	

#	Hard-to-Reach Businesses Program	Score	Comment 1	Comment 2	Comment 3
9	Description of methods of determining program influence through detailed data collection and analysis	**Needs Improvement**	Description of methods for determining program influence through detailed data collection and analysis is provided for sampled projects, see EM&V Table E-4. However, there is no description of these methods for unsampled projects, which make up a majority of the program.		EM&V Paragraph E.7, ADM conducted a participant survey with 25 respondents.
10	For programs or projects that target savings less than ten percent of annual consumption, a detailed description of rationale and methods for distinguishing savings from normal variations in consumption.	**Unknown**	Staff can not determine if program savings are less than ten percent of annual consumption.		
11	If targeting to-code savings, a detailed description of the following. • Identify the specific code that is targeted. • Specify the equipment types, building types, geographical locations, and/or customer segments that will provide cost-effective to-code savings. • Describe the specific barriers that are preventing code-compliant equipment replacements. • Describe the reasons that natural turnover is inadequate for certain markets or technologies. • Explain program interventions that would effectively accelerate equipment turnover.	**Unsatisfactory**	No descriptions of the following: • Identify the specific code that is targeted. • Specify the equipment types, building types, geographical locations, and/or customer segments that will provide cost-effective to-code savings. • Describe the specific barriers that are preventing code-compliant equipment replacements. • Describe the reasons that natural turnover is inadequate for certain markets or technologies. • Explain program interventions that would effectively accelerate equipment turnover.		
12	Any Bid M&V Plan submitted by third-party implementers in their bids (at minimum, must include above-listed items 1, 3, 4, 5, and 8).	**Unknown**	Staff can not find any bid M&V plans provided by third-party implementers for this program.		
13	Detailed description of the timing of real-time M&V activities, including M&V schedules that will enable Evergy to use ex-post verified savings (as determined by the independent EM&V contractor) to determine a significant portion of customer and implementer incentives	**Unsatisfactory**	Staff could not find detailed descriptions of the timing of real-time M&V activities, including M&V schedules and implementer incentives		
14	Methods to account for interactive effects for participants in multiple programs, i.e., ensure that there is no double counting of reported savings.	**Unsatisfactory**	EM&V Paragraph 5.3 notes that "ADM investigated participant spillover through its Whole Home, Whole Business Efficiency, and Hard-to-Reach Businesses participant surveys."	EM&V Paragraph E.7 notes that there were 25 survey responses from the HRB program participants. This represents a small sample of the 374 total projects noted in Table E-2. Furthermore, Staff can not find information that specifically ensured that there was no double counting of reported savings, other than a statement Paragraph 5.3 stating that a survey was conducted for the HRB program.	

#	Hard-to-Reach Businesses Program	Score	Comment 1	Comment 2	Comment 3
15	Methods for calculating cost effectiveness.	**Satisfactory**	EM&V Paragraph 3.4, methods informed by California Standard Practice Manual.	https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_public_website/content/utilities_and_industries/energy_-_electricity_and_natural_gas/cpuc-standard-practice-manual.pdf	
16	Detailed description of M&V schedules, including a timeline for all activities, the frequency of M&V review/input to ensure adherence to the real-time M&V approach, specific real-time M&V milestones throughout the program year, and M&V reporting schedules and deadlines	**Unsatisfactory**	Staff could not find detailed descriptions of M&V schedules, including a timeline for all activities, the frequency of M&V review/input to ensure adherence to the real-time M&V approach, specific real-time M&V milestones throughout the program year, and M&V reporting schedules and deadlines in the EM&V.		
17	Any other information required by the Commission, including (but not limited to) description of program compliance with the Commission approved Stipulations and the Commission Order in Docket 22-EKME-254-TAR.	**Unsatisfactory**	No description of program compliance with the Commission approved Stipulations and Commission Order in Docket 22-EKME-254-TAR.		
18	M&V Plans must describe M&V transparency, which must include (but is not limited to) discussion of the following components of transparency. • To demonstrate the replicability of savings calculations, the Commission will be provided all analytical methods, work papers, and data, including M&V spreadsheets, R code, explanatory presentations (e.g., workshop presentations and tutorials), and supporting files, references, and literature.	**Unsatisfactory**	Staff is unable to replicate the savings calculations conducted by ADM.	EM&V Paragraph E.10 Notes recommendations that Staff supports. Specifically that father program years should "Include specific information about baseline equipment" such as including phots, model numbers and baseline wattage. Staff also supports the recommendation that future program years "Provide incremental costs for all measures and projects in the tracking data."	

#	Home Demand Response Program	Score	Comment 1	Comment 2	Comment 3
1	Description of the program target population and participant eligibility criteria.	**Satisfactory**	EM&V Paragraph F.1 1. Customers can purchase devices and install the device themselves. 2. Customers can receive devices provided ad a discounted price and receive professional installation. 3. Customers can enroll their eligible existing device.	EM&V Paragraph F.3.2.1 has a section titled "Eligible Units" that further elaborates.	
2	Description of incentive structure, including which entity receives compensation at each stage of the project, and methods/tools used to calculate incentives or compensation.	**Unsatisfactory**	EM&V Paragraph F.1 1. Customers can purchase devices and install the device themselves. 2. Customers can receive devices provided ad a discounted price and receive professional installation. 3. Customers can enroll their eligible existing device.	No description in EM&V of incentive structure specifically regarding which entity receives compensation at each stage of the project.	Lacks thorough description of methods/tools used to calculate incentives or compensation.
3	Detailed documentation and supporting work papers for expected costs, baseline, baseline period (e.g., the 12-month period immediately preceding intervention), energy savings, peak impacts, and effective useful life (EUL) of planned measures and intervention strategies; also describe how project-level EUL will be calculated.	**Needs Improvement**	No mention of effective useful life (EUL) of planned measures. No descriptions of, or calculations of the project-level EUL.	EM&V Paragraph F.3.1.3, Prior-Day Averaging Customer Baselines (CBL)	
4	Description of methodology, analytical methods, and software employed for calculating NMEC, gross savings, and net savings resulting from the energy efficiency measures installed and not influenced by unrelated changes in energy consumption.	**Unsatisfactory**	**Data Collection**: 22-254 DR# 134 and EM&V Table F-8. 48,300 out of 70,006 total enrolled devices were non-contributing. This is 69.0% of the total sample.* **NMEC Concern:** Staff notes that the high non-contribution rate of 69.0% puts into question the accuracy of ADM's claim of 100% NMEC Verified Savings for HDR Program found in EM&V Table 4-1. Furthermore, staff can not verify accuracy of the 100% Verified Savings value.	EM&V Paragraph F.3.1.5, Equation 8-17 Notes HDR Final model. However, this model would be better communicated graphically as well.	
5	Description of methodology must address weather normalization, calculation of hourly load shape impacts, and other factors including adjustments for non-routine events.	**Satisfactory**	EM&V Paragraph F.2.1, two types of weather data utilized. 1) actual recorded weather data from NOAA and 2) 30-year weather normal or Typical Meteorological year (TMY). "Actual weather data was used when fitting the models and TMY data was used to extrapolate savings (if appropriate)."	EM&V Paragraph F.2.1, Heating Degree Hours (HDH) and Cooling Degree Hours (CDH) from NOAA.gov were utilized in regression analysis from the nearest available weather stations and assigned based on zip code.	
6	Detailed Sampling Plan.	**Needs Improvement**	EM&V Paragraph F.2.2, However further clarification is needed, such as listing sample size per jurisdiction, device type per jurisdiction and further elaboration on extrapolated peak demand reduction in the sampling plan.		

#	Home Demand Response Program	Score	Comment 1	Comment 2	Comment 3
7	For any program design targeting large treatment groups, the M&V Plan must provide a detailed explanation of the selection process for treatment and representative control groups; this requirement also applies to Randomized Controlled Trials (RCTs).	**Satisfactory**	EM&V Paragraph F.3.3.1, Propensity Score Matching (PSM) was utilized to create statistically similar, matched pre-period control and treatment groups. Joint chi-square test for covariate balance of p-value of 1.00, further pre-period confirming the treatment and comparison groups are statistically similar.		
8	Detailed Data Collection Plan, including description of monitoring activities for each energy efficiency measure category that is expected to be implemented and sampled; data collection includes all AMI data, metered data, sub-metered data, building energy management system data, and logger data.	**Satisfactory**	EM&V Paragraph F.2.1 describes Data Collection methods. AMI data is collected in 15-minute interval meter data for each participating customer.	EM&V Table 4-1, 100% NMEC Verified Savings for HDR Program.	
9	Description of methods of determining program influence through detailed data collection and analysis	**Needs Improvement**	**Data Collection**: 22-254 DR# 134 and EM&V Table F-8. 48,300 out of 70,006 total enrolled devices were non-contributing. This is 69.0% of the total sample.* EM&V Paragraph F.2.2 "Google devices were not successfully dispatched in PY1." All Google Thermostats were non-contributing for PY1.	EM&V Paragraph F.3.1 describes estimation evaluation impacts.	
10	For programs or projects that target savings less than ten percent of annual consumption, a detailed description of rationale and methods for distinguishing savings from normal variations in consumption.	**Satisfactory**	EM&V Paragraph F.2.1 describes Data Collection methods. AMI data is collected in 15-minute interval meter data for each participating customer.	EM&V Paragraph F.3.1.1, Proxy days were utilized to test the suitability of the baseline approach. "Proxy days represent days like demand response event days in terms of load shape and temperature profiles."	EM&V Paragraph F.3.1.1, Estimated bias (uncertainty) was examined using Mean Percent Error and Root Mean Squared Error.
11	If targeting to-code savings, a detailed description of the following. • Identify the specific code that is targeted. • Specify the equipment types, building types, geographical locations, and/or customer segments that will provide cost-effective to-code savings. • Describe the specific barriers that are preventing code-compliant equipment replacements. • Describe the reasons that natural turnover is inadequate for certain markets or technologies. • Explain program interventions that would effectively accelerate equipment turnover	**N/A**	Not targeting to-code savings.		
12	Any Bid M&V Plan submitted by third-party implementers in their bids (at minimum, must include above-listed items 1, 3, 4, 5, and 8).	**Unknown**	Staff can not find any bid M&V plans provided by third-party implementers for this program.		
13	Detailed description of the timing of real-time M&V activities, including M&V schedules that will enable Evergy to use ex-post verified savings (as determined by the independent EM&V contractor) to determine a significant portion of customer and implementer incentives	**Satisfactory**	EM&V Paragraph F.2.1 describes Data Collection methods. AMI data is collected in 15-minute interval meter data for each participating customer.		

#	Home Demand Response Program	Score	Comment 1	Comment 2	Comment 3
14	Methods to account for interactive effects for participants in multiple programs, i.e., ensure that there is no double counting of reported savings.	**Unsatisfactory**	Staff can not find this information in the EM&V for the HDR program. EM&V Paragraph 5.3 notes that "ADM investigated participant spillover through its Whole Home, Whole Business Efficiency, and Hard-to-Reach Businesses participant surveys"		
15	Methods for calculating cost effectiveness.	**Satisfactory**	EM&V Paragraph 3.4, methods informed by California Standard Practice Manual.	https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_public_website/content/utilities_and_industries/energy_-_electricity_and_natural_gas/cpuc-standard-practice-manual.pdf	
16	Detailed description of M&V schedules, including a timeline for all activities, the frequency of M&V review/input to ensure adherence to the real-time M&V approach, specific real-time M&V milestones throughout the program year, and M&V reporting schedules and deadlines	**Needs Improvement**	EM&V Table F-6 and Table F-7 describe DR Events in 2024. However, Google Devices were not part of the participating sample, and more than a single event date for Smart Thermostats would be beneficial.	Further information regarding M&V milestones, reporting schedules and deadlines would be beneficial.	
17	Any other information required by the Commission, including (but not limited to) description of program compliance with the Commission approved Stipulations and the Commission Order in Docket 22-EKME-254-TAR.	**Unsatisfactory**	No description of program compliance with the Commission approved Stipulations and Commission Order in Docket 22-EKME-254-TAR.		
18	M&V Plans must describe M&V transparency, which must include (but is not limited to) discussion of the following components of transparency. • To demonstrate the replicability of savings calculations, the Commission will be provided all analytical methods, work papers, and data, including M&V spreadsheets, R code, explanatory presentations (e.g., workshop presentations and tutorials), and supporting files, references, and literature.	**Unsatisfactory**	Staff is unable to replicate the savings calculations conducted by ADM.		

*Staff calculated a total sample non-contribution amount of 69.0% by determining a total device amount from Table F-8 (70006) and calculating a total amount of non-contributing devices from DR-134 (263 Ecobee devices and 42,464 Legacy devices) and Table F- (5573 Google devices) for a total of 48,300 non-contributing devices.

#	Business Demand Response Program	Score	Comment 1	Comment 2	Comment 3
1	Description of the program target population and participant eligibility criteria.	**Satisfactory**	Paragraph G.1 "To remain eligible for the multi-year agreement bonus, participants must meet 90 percent performance."	**Participant eligibility:** Paragraph G.8.2 Target is larger Tier 1 business customers. "These customers must have a peak demand of at least 750kW and sign up for a maximum of 20 hours of curtailment a year."	**Target Population:** Paragraph G.8.2 Target is larger Tier 1 business customers.
2	Description of incentive structure, including which entity receives compensation at each stage of the project, and methods/tools used to calculate incentives or compensation.	**Satisfactory**	**Incentive Structure:** Paragraph G1. One year incentive calculated as "Incentive = $28 x kW Enrolled x Percentage of Enrolled kW Achieved. For multiple years "Incentive = $30 x kW Enrolled x Percentage of Enrolled kW Achieved. Participent recieves compensation.		
3	Detailed documentation and supporting work papers for expected costs, baseline, baseline period (e.g., the 12-month period immediately preceding intervention), energy savings, peak impacts, and effective useful life (EUL) of planned measures and intervention strategies; also describe how project-level EUL will be calculated.	**Unsatisfactory**	**Customer Baseline (CBL):** Paragraph 7.71 Evergy **...**"utilized a *single Customer Baseline (CBL)* for all sites for the baseline counterfactual. Unlike prior program years, Evergy was not able to utilize the Distributed Energy Management System (DERMS) CBL models that ADM provides at the start of each summer DR season, and a *less optimal* CBL model was utilized for reported demand reduction baselines." On Paragraph G.9 ADM notes that "*Utilizing only one CBL model is not recommended for determining demand reductions..* ." Emphasis added.	**Baseline period:** Table G-6, period ranges from 5-10 days before the event, and hours between 2-6pm. **Energy Savings**: See Table G-7	**Peak Impact:** Paragraph G.3.3, "Peak demand reduction was determined as the maximum hourly difference between event hours and a counterfactual non-event period on the system peak day for the jurisdiction." **Effective useful life** or BDR program persistence is not mentioned or calculated anywhere.
4	Description of methodology, analytical methods, and software employed for calculating NMEC, gross savings, and net savings resulting from the energy efficiency measures installed and not influenced by unrelated changes in energy consumption.	**Needs Improvement**	Table 4-1, 100% NMEC Verified Savings for BDR program. Paragraph G.2.1 15-minute interval meter data (AMI) for each customer. However, Staff can not verify accuracy of the 100% Verified Savings value.	DERMS software, however implimentor "staff noted that they encounted challenges with setup or initial usage of the DERMS"	**Gross savings**, See EM&V Paragraphs G.3.2.4 and G.3.4.
5	Description of methodology must address weather normalization, calculation of hourly load shape impacts, and other factors including adjustments for non-routine events.	**Needs Improvement**	**Weather Normalization:** See Table 7-17 for Savings vs weather. Paragraph G.2.1 "ADM collected recorded weather data from... (NOAA)... Data was collected from the Kansas City International Airport	**Calculation of Hourly Load Shape Impacts**: See G.3.3 for Load shape figures, however methodology is not well stated and is vague.	Paragraph G.3.2.1 "determining this baseline is a non-trivial task, especially in the context of commercial and industrial customers whose energy usage could theoretically be a function of the weather, the number of orders received, shift schedules, economic trends, and any number of variables that cannot always be explicitly modeled."
6	Detailed Sampling Plan.	**Unsatisfactory**	**Paragraph G.2.2 Sampling Plan:** states only in its entirety "ADM evaluated a census of participants for the impact evaluation."		
7	For any program design targeting large treatment groups, the M&V Plan must provide a detailed explanation of the selection process for treatment and representative control groups; this requirement also applies to Randomized Controlled Trials (RCTs).	**N/A**	Treatment group was only 28 participants.		

#	Business Demand Response Program	Score	Comment 1	Comment 2	Comment 3
8	Detailed Data Collection Plan, including description of monitoring activities for each energy efficiency measure category that is expected to be implemented and sampled; data collection includes all AMI data, metered data, sub-metered data, building energy management system data, and logger data.	**Satisfactory**	Metered data is used and recorded using DERMS.	Paragraph G.2.1 15-minute interval meter data (AMI)	
9	Description of methods of determining program influence through detailed data collection and analysis	**Staisfactory**	Paragraph G.2.1 Metered data is collected every 15 minutes. ADM reviewed data tracking systems to ensure data provided sufficient information to calculate energy and demand impacts		
10	For programs or projects that target savings less than ten percent of annual consumption, a detailed description of rationale and methods for distinguishing savings from normal variations in consumption.	**Satisfactory**	Curtailment events are used, compared to normal baseline consumption trend of the previous 5 day lookback window.		
11	If targeting to-code savings, a detailed description of the following. • Identify the specific code that is targeted. • Specify the equipment types, building types, geographical locations, and/or customer segments that will provide cost-effective to-code savings. • Describe the specific barriers that are preventing code-compliant equipment replacements. • Describe the reasons that natural turnover is inadequate for certain markets or technologies. • Explain program interventions that would effectively accelerate equipment turnover	**N/A**	Not targeting to-code savings.		
12	Any Bid M&V Plan submitted by third-party implementers in their bids (at minimum, must include above-listed items 1, 3, 4, 5, and 8).	**Unknown**	Staff can not find any bid M&V plans provided by third-party implementers for this program.		
13	Detailed description of the timing of real-time M&V activities, including M&V schedules that will enable Evergy to use ex-post verified savings (as determined by the independent EM&V contractor) to determine a significant portion of customer and implementer incentives	**Needs Improvement**	Paragraph G.2.3 "Based on Kansas regulations, ADM used method 1a and prtocol 2a to evaluate the BDR Program... Evergy does not claim energy savings for demand response initiative(DRI); thus, the evaluation team did not calculate energy savings.		
14	Methods to account for interactive effects for participants in multiple programs, i.e., ensure that there is no double counting of reported savings.	**Unsatisfactory**	Staff can not find this information in the EM&V for the BDR program. EM&V Paragraph 5.3 notes that "ADM investigated participant spillover through its Whole Home, Whole Business Efficiency, and Hard-to-Reach Businesses participant surveys"		
15	Methods for calculating cost effectiveness.	**Satisfactory**	EM&V Paragraph 3.4, methods informed by California Standard Practice Manual.	https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_public_website/content/utilities_and_industries/energy_-_electricity_and_natural_gas/cpuc-standard-practice-manual.pdf	

#	Business Demand Response Program	Score	Comment 1	Comment 2	Comment 3
16	Detailed description of M&V schedules, including a timeline for all activities, the frequency of M&V review/input to ensure adherence to the real-time M&V approach, specific real-time M&V milestones throughout the program year, and M&V reporting schedules and deadlines	**Needs Improvement**	List of curtailment events available "Evergy BDR KS Analysis Results PY2024.xlsx"	Not able to locate real-time M&V reporting schedules and deadlines.	
17	Any other information required by the Commission, including (but not limited to) description of program compliance with the Commission approved Stipulations and the Commission Order in Docket 22-EKME-254-TAR.	**Unsatisfactory**	No description of program compliance with the Commission approved Stipulations and Commission Order in Docket 22-EKME-254-TAR.		
18	M&V Plans must describe M&V transparency, which must include (but is not limited to) discussion of the following components of transparency. • To demonstrate the replicability of savings calculations, the Commission will be provided all analytical methods, work papers, and data, including M&V spreadsheets, R code, explanatory presentations (e.g., workshop presentations and tutorials), and supporting files, references, and literature.	**Unsatisfactory**	Staff is unable to replicate the savings calculations conducted by ADM.		

Evergy KS Central and KS Metro
Case Name: 2022 EKME_EKCE KEEIA
Case Number: 22-EKME-254-TAR

Requestor Ghilino Matthew -
Response Provided July 17, 2025

Question:KCC-97
Regarding: KEEIA Cycle 1, PY1 EM&V report, May 15, 2025; Appendix D, Paragraph D.3.1

Please Provide the Following:
In Paragraph 56 of the Commission Order approving the current KEEIA program, the Commission stated in part, “The Commission expresses a strong preference for "measured savings," as opposed to "deemed savings" approaches. And more specifically, meter-based data should be used in every instance where it is feasible and cost-effective”.
Paragraph D.3.1 of the subject report states that… “The calculation of gross energy savings and demand reduction impacts primarily relied on energy savings values and algorithms from the Evergy TRM and custom algorithms.”
For the Whole Business Efficiency category, please explain why meter-based data was not the primary source for calculating energy savings.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC
Statement: This response is Public. No Confidential Statement is needed.

Response:

ADM knows of the preference for the meter-based data. The first sets of program tracking data were available to ADM at the end of the January 2025, the final set of tracking came in April. It would not have been feasible to analyze meter-based utility bill regressions post periods.

ADM’s most common measurement technique was to measure lighting hours of use with lighting loggers. ADM installed lighting loggers at each site, for more than 2 weeks, with interior lighting measures to measure hours of use. ADM also verified fixture counts and heating and cooling types.

Information above is provided by ADM.

Information provided by:

Adelle Horton, Sr Energy Solutions Analyst

Attachment(s):

Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs

Evergy KS Central and KS Metro
Case Name: 2022 EKME_EKCE KEEIA
Case Number: 22-EKME-254-TAR

Requestor Haynos Leo -
Response Provided August 25, 2025

Question:KCC-140
Regarding: RE: Table 4-1 in KEEIA Cycle 1 Program Year 1 Evaluation, Measurement & Verification ("EM&V") Report, dated May 15, 2025

Please Provide the Following:

Please provide a table similar to table 4-1 showing NMEC verified savings and planned percentage of NMEC for each program in each jurisdiction (EKC and EKM)

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC
Statement: This response is Public. No Confidential Statement is needed.

Response:

See the table below for the NMEC verified savings and planned percentage of NMEC for each program by jurisdiction in PY1, as well as the actual percentage of NMEC.

Jurisdiction	Sector	Program	Planned % of NMEC Analyses and/or Utilizing AMI Data[1]	NMEC Verified Savings	Total Verified Savings	Actual % of NMEC Analyses and/or Utilizing AMI Data
Kansas Central	Residential Programs	Whole Home Efficiency	92.7%	1,532,893	1,532,893	100.0%
		Hard-to-Reach Homes	81.0%	184,131	3,491,415	5.3%
		Home Energy Education	100.0%	589,077	589,077	100.0%
		Home Demand Response	100.0%	493,210	493,210	100.0%
		Residential Programs Subtotal	**92.6%**	**2,799,311**	**6,106,595**	**45.8%**
	Business Programs	Whole Business Efficiency	95.9%	1,719,695	2,209,915	77.8%
		Hard-to-Reach Businesses	92.6%	2,895,548	3,288,102	88.1%
		Business Demand Response[2]	100.0%	0	0	100.0%
		Business Programs Subtotal	**95.2%**	**4,615,243**	**5,498,017**	**83.9%**
Kansas Metro	Residential Programs	Whole Home Efficiency	92.7%	1,813,246	1,813,246	100.0%
		Hard-to-Reach Homes	81.0%	33,153	479,883	6.9%
		Home Energy Education	100.0%	238,612	238,612	100.0%
		Home Demand Response	100.0%	152,810	152,810	100.0%
		Residential Programs Subtotal	**92.6%**	**2,237,821**	**2,684,551**	**83.4%**
	Business Programs	Whole Business Efficiency	95.9%	1,018,454	2,977,033	34.2%
		Hard-to-Reach Businesses	92.6%	444,093	643,357	69.0%
		Business Demand Response[2]	100.0%	0	0	100.0%
		Business Programs Subtotal	**95.2%**	**1,462,547**	**3,620,390**	**40.4%**
Portfolio Total			**94.4%**	**11,114,922**	**17,909,553**	**62.1%**

[1] Planned NMEC percentages were developed at the utility level.
[2] The Business Demand Response Program did not claim energy savings in PY1 (only peak demand reduction).

Information above is provided by ADM.

Information provided by:

Adelle Horton, Sr. Energy Solutions Analyst

Attachment(s):

Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently

discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs

CERTIFICATE OF SERVICE

25-EKCE-503-TAR

I, the undersigned, certify that a true copy of the attached Filing has been served to the following by means of electronic service on August 29, 2025.

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CERTIFICATE OF SERVICE

25-EKCE-503-TAR

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* Denotes those receiving the Confidential version