



May 30, 2025

Kansas Corporation Commission  
1500 SW Arrowhead Rd.  
Topeka, Kansas 66604-4027

25-EKCE-447-TAR

**RE: 25-EKCE- 447 CPL Evergy Kansas Central, Inc and Evergy Kansas South, Inc. Annual Compliance filing pursuant to K.S.A. 66-1283**

To Whom it May Concern:

Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. (collectively referred to herein as "Evergy Kansas Central") are submitting their Annual Compliance Filing as required by K.S.A. 66-1283.

Per Statute, this Annual Compliance Filing provides the following:

(f) On or before May 31 of each year, each public utility shall submit an annual report to the commission describing the results of such demand-side programs for the previous calendar year. The report shall include:

- (1) Program expenditures, including incentive payments;
- (2) Peak demand and energy savings impacts and the techniques used to estimate such impacts;
- (3) Avoided costs and the techniques used to estimate such costs;
- (4) The estimated cost-effectiveness of the demand-side programs;
- (5) The net economic benefits of the demand-side programs; and
- (6) A comparison of the commission authorized program budget to actual costs.

Additionally, the Commission's order in Docket 22-EKME-254-TAR requires Evergy's collaboration with Staff and reporting on any federal funding developments that may warrant modification of the Commission's order. Evergy has collaborated with Staff at the Kansas Energy Office with previous reports filed on October 31, 2023 and May 31, 2024. Evergy stated in the May 31, 2024 filing that future reports would be included with this Annual Compliance filing by May 31<sup>st</sup> each year. Kansas Energy Office Staff confirms they are awaiting DOE feedback on two applications submitted for the IRA Home Energy Rebate. Evergy will continue to collaborate with the Kansas Energy Office on DOE progress to identify any impact on Evergy's KEEIA programs.



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

Linda Nunn  
Manager - Regulatory Affairs  
Evergy, Inc.  
1200 Main Street – 19<sup>th</sup> Floor  
Kansas City, Missouri 64105  
Phone: (816) 652-1292  
Email: [linda.nunn@evergy.com](mailto:linda.nunn@evergy.com)

And

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

Sincerely,

A handwritten signature in blue ink that reads "Cathryn Dinges".

Cathryn J. Dinges  
Sr Director & Regulatory Affairs Counsel

Attorney for Evergy Kansas Central, Inc. and  
Evergy Kansas South, Inc.

cc: Linda Nunn  
Robin Allacher

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Utility: EVERGY KANSAS CENTRAL  
KEEIA Cycle 1 Annual Report  
Report Date: 05/30/2025  
Period: 01/01/2024 - 12/31/2024  
Portfolio Start Date: 03/01/2024

Program Expenditures- Commission-Authorized Program Budget to  
Actual Costs Comparison and Incentive Payments:

Programs' Expenditures (Recorded)	1ST YEAR ACTUAL TOTAL EXPENDITURES	1ST YEAR BUDGET	1ST YEAR VARIANCE	1ST YEAR % OF BUDGET	1ST YEAR INCENTIVE PAYMENTS*
Business Demand Response	\$ 1,157,589	\$ 453,582	\$ (704,006)	255.21%	\$ 447,151
Business Energy Education	\$ 423,762	\$ 927,222	\$ 503,459	45.70%	\$ 423,762
Hard To Reach Business	\$ 1,156,830	\$ 1,548,969	\$ 392,139	74.68%	\$ 747,166
Whole Business Efficiency	\$ 1,304,632	\$ 4,004,356	\$ 2,699,724	32.58%	\$ 335,444
Home Demand Response	\$ 1,452,762	\$ 2,039,239	\$ 586,477	71.24%	\$ 739,059
Home Energy Education	\$ 909,504	\$ 721,387	\$ (188,117)	126.08%	\$ 905,764
Hard To Reach Homes	\$ 1,495,627	\$ 1,650,689	\$ 155,062	90.61%	\$ 953,953
Whole Home Efficiency	\$ 868,087	\$ 858,514	\$ (9,573)	101.12%	\$ 470,996
Pilot Incubator	\$ 170,582	\$ 191,764	\$ 21,182	88.95%	\$ 83,752
Incremental All Programs' Costs	\$ 8,939,375	\$ 12,395,722	\$ 3,456,346	72.12%	\$ 5,107,047

\* Incentive payments are any consideration provided by Evergy directly or through the Program Administrator and Program Partners, including buydowns, markdowns, rebates, bill credits, payment to third parties, direct installations, giveaways and education, which encourages the adoption of Measures. 22-EKME-254-TAR Section 13 Sheet 1 (EKC) Section 12 Sheet 1 (EKM)

**Utility: EVERGY KANSAS CENTRAL**  
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**Ex-Post Evaluated Energy Savings and Peak Demand Impacts:**

Programs' Energy Savings (kWh)	1ST YEAR ACTUAL
Business Demand Response	-
Business Energy Education	-
Hard To Reach Business	3,288,102.2437
Whole Business Efficiency	2,209,914.5381
Home Demand Response	493,210.0000
Home Energy Education	589,077.0000
Hard To Reach Homes	3,491,415.1652
Whole Home Efficiency	1,532,893.3272
Pilot Incubator	-
Incremental Total Energy Savings (kWh)	11,604,612.2743

Programs' Peak Demand Savings (kW)	1ST YEAR ACTUAL
Business Demand Response	10,888.1500
Business Energy Education	-
Hard To Reach Business	263.6575
Whole Business Efficiency	256.5192
Home Demand Response	17,821.8300
Home Energy Education	211.5400
Hard To Reach Homes	1,269.3317
Whole Home Efficiency	994.1923
Pilot Incubator	-
Incremental Total Peak Demand Savings (kW)	31,705.2206

**Impacts Estimation Techniques Description:**

The EM&V Report presents and explains transparent, robust, and modern EM&V that utilized rigorous measurement techniques and meter-based data. Based on the Program Year 1 verified savings, meter-based methodology was used to determine 62.8 percent of verified energy impacts. EM&V site-level monitoring for Commercial Programs represents 68 percent of verified savings program level savings. For a breakdown of each methodology used per program, see Appendix A through Appendix G in the Evergy KEEIA Cycle I – PY1 Residential, Business, & Demand Response Final EM&V Report.

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**Avoided Costs:**

**Avoided Capacity Cost**

The avoided capacity costs used in the annual report were developed using a market-based approach. The values and approach were approved by the Commission in the KEEIA Cycle 1 filing case # 22-EKME-254-TAR. The values used are listed below.

	KEEIA 1 Approved Plan
2024	\$63.55
2025	\$66.34
2026	\$79.61
2027	\$81.12
2028	\$117.96
2029	\$120.91
2030	\$123.93
2031	\$127.03
2032	\$168.62
2033	\$172.84
2034	\$177.16
2035	\$181.59
2036	\$186.13
2037	\$190.78
2038	\$195.55
2039	\$200.44
2040	\$205.45
2041	\$210.59
2042	\$215.85
2043	\$221.25

**Avoided Energy Cost**

The corresponding energy costs by year are provided in the table below (values in nominal dollars).

	KEEIA 1 Approved Plan
2024	20.56
2025	22.26
2026	23.94
2027	26.56
2028	29.69
2029	32.75
2030	40.60
2031	54.84
2032	53.31
2033	53.02
2034	54.30
2035	57.36
2036	59.47
2037	59.69
2038	61.22
2039	62.95
2040	65.25
2041	62.47
2042	64.04
2043	65.64

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Estimated Cost-Effectiveness:

Evaluated Cost-Effectiveness Tests	TRC	UCT	PCT	RIM	SCT
Business Demand Response	1.10	0.66	-	0.66	1.10
Business Energy Education	-	-	-	-	-
Hard To Reach Business	1.05	1.33	0.99	0.99	1.34
Whole Business Efficiency	0.80	0.80	1.54	0.67	0.99
Home Demand Response	1.68	1.35	2.33	1.07	1.81
Home Energy Education	5.06	0.04	-	0.04	5.06
Hard To Reach Homes	1.26	1.15	3.94	0.45	1.51
Whole Home Efficiency	1.99	1.99	2.29	0.85	2.78
Pilot Incubator	-	-	-	-	-
	1.27	1.05	2.53	0.68	1.54

TRC - Total Resource Cost  
UCT - Utility Cost Test  
PCT – Participant Cost Test  
RIM – Ratepayer Impact Measure Test  
SCT – Societal Cost Test

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## Net Economic Benefits:

Programs' Net Economic Benefits	1ST YEAR ACTUAL
Business Demand Response	\$ 64,540
Business Energy Education	\$ -
Hard To Reach Business	\$ 80,015
Whole Business Efficiency	\$ (266,016)
Home Demand Response	\$ 731,014
Home Energy Education	\$ 30,714
Hard To Reach Homes	\$ 336,307
Whole Home Efficiency	\$ 821,950
Pilot Incubator	\$ -
Incremental All Programs' Net Economic Benefits	\$ 1,798,525

**Calculation: Gross Benefits for TRC test minus Program Costs from TRC test**