

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

- True-Up from Docket No. 22-EKME-464-TAR (“22-464 Docket”) of over collected costs in the amount of \$18,012 (\$16,510 for residential customers and \$1,502 for non-residential customers);
- True-Up from Docket No. 23-EKME-708-TAR (“23-708 Docket”) of under collected costs in the amount of \$4,684 (overcollection of \$1,848 for residential customers and under collection of \$6,532 for non-residential customers); and
- Deferred costs from Docket No. 24-EKME-651-TAR (“24-651 Docket”) in the amount of \$172,600 (\$90,004 for residential customers and \$82,627 for non-residential customers).<sup>2</sup>

3. On August 21, 2025, the Commission Staff (“Staff”) filed a Request to Modify Year One EM&V Report and Rider Schedule in this Docket and in Docket No. 22-EKME-254-TAR (“22-254 Docket”), requesting modification of the following deadlines:

- A. Extend the deadline for Staff’s Report and Recommendation from August 15 to August 29, 2025;
- B. Extend the deadline for stakeholder responses from September 1, 2025, to September 15, 2025; and
- C. Extend the deadline for a Commission Order from October 1, 2025, to October 15, 2025.

4. On August 21, 2025, the Commission issued an order granting Staff’s request in the 22-254 Docket.

5. On August 27, 2025, Evergy Kansas Metro filed a Motion to Continue Energy Efficiency Rider Rate (“Motion”), requesting to continue its currently authorized EER rate through October 14, 2025, to accommodate the extended deadlines outlined above.<sup>3</sup> This Motion was subsequently granted by the Commission.<sup>4</sup>

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<sup>2</sup> See *id.*; see also, Commission Staff’s Report and Recommendation, pp. 1-2 (Aug. 29, 2025) (“Staff’s R&R”).

<sup>3</sup> Motion to Continue Energy Efficiency Rider Rate (Aug. 27, 2025) (Evergy Kansas Metro proposed that the two added weeks of the current rate which may result in an over or under collection can be handled in its 2026 KEEIA/EER filing).

<sup>4</sup> Order Designating Presiding Officer and Extending Energy Efficiency Rider Date (Sept. 23, 2025).

6. On August 29, 2025, Staff filed a Report and Recommendation in this Docket (“Staff’s R&R”), recommending approval of the requested recovery of expenses, except for the TD and EO incentives due to Evergy Kansas Metro’s failure to provide sufficient information/data to allow Staff to verify this request, and Evergy Kansas Metro’s failure to apply the Normalized Metered Energy Consumption (“NMEC”) analysis “to savings calculations at the minimum level prescribed by the Commission Order.”<sup>5</sup> This recommendation results in a revised KEEIA EER amount of \$4,299,543, including \$2,329,241 from residential customers and \$1,970,303 from non-residential customers, and a revised KEEIA EER factor of \$0.00078/kWh for residential customers and \$0.00056/kWh for non-residential customers, which would be effective October 15, 2025, through September 30, 2026.<sup>6</sup> Ultimately, Staff recommends Evergy Kansas Metro do the following:

- A. File its next KEEIA EER in June 2026, to include costs incurred from Commission-approved programs from May 1, 2025, through April 30, 2026. The filing should 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.
- B. Conduct quarterly meetings to allow Staff to ask questions, evaluate program metrics, provide feedback, and to continue to refine the Technical Reference Manual (“TRM”).
- C. Be denied TD and EO portions with the ability to file for recovery of Plan Year 1 TD and EO in Plan Year 2, if it provides sufficient data to allow Staff to replicate the savings calculations and minimum NMEC analysis to evaluate if the criteria is met.<sup>7</sup>

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<sup>5</sup> Staff’s R&R, p. 2.

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*, p. 19.

7. Evergy Kansas Metro responded on September 15, 2025, acquiescing to Staff's R&R, but disagreeing with Staff's assessment that it failed to provide sufficient data to allow recovery of the TD and EO expenses and that it failed to apply the NMEC analysis as "there is no requirement for NMEC measurement prescribed by the Commission that restricts recovery of TD and EO."<sup>8</sup> Evergy Kansas Metro argues it complied with existing NMEC measurement parameters outlined in the 22-254 Docket, and its Evaluation Measurement and Verification ("EM&V") Program Year 1 report complied with all applicable Commission directives approved in the 22-254 Docket.<sup>9</sup>

8. Evergy Kansas Metro stated it would respond in the 22-254 Docket to address Staff's concerns regarding the alleged lack of data to justify the TD and EO recovery and the disagreement regarding the applicable NMEC measurements.<sup>10</sup> It also requested approval to seek "recovery of the Plan Year 1 TD and EO with interest" as part of its Plan Year 2 filing, and modification of Staff's recommended dates outlined in paragraph 6(a) above, as follows:

Evergy Kansas Metro shall file its next KEEIA EER in June 2026, to include costs incurred from Commission approved programs for Program Year 1 from May 1, 2025, through July 31, 2025, and Program Year 2 from January 1, 2025, through April 30, 2026. In this filing, Evergy Kansas Metro shall also include a true-up calculation to include the difference between:

- a. Actual amounts collected from January 1, 2025, (including legacy program revenue collected prior to the recovery period start date) to April 30, 2026, plus forecasted amounts to be collected from May 1, 2026, to September 30, 2026, and
- b. The approved recovery amounts from the June 15, 2025, filing.

9. On September 15, 2025, CURB filed a response to Staff's R&R, agreeing with Staff's recommendations.<sup>11</sup>

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<sup>8</sup> Evergy Metro, Inc.'s Response to Staff report and Recommendation, pp. 3-7 (Sept. 15, 2025).

<sup>9</sup> *See id.*

<sup>10</sup> *Id.*, p. 7.

<sup>11</sup> CURB Response to Staff's Notice of Filing of Report and Recommendation (Sept. 15, 2025).

10. The Commission appreciates the anticipated cooperation, and quarterly meetings should minimize future disputes regarding the NMEC measurements and the appropriate data to be supplied for Staff to properly evaluate the EO and TD recovery requests in future EER dockets. Docket 22-254 provides the appropriate forum for the parties to argue their positions in these disputed areas, and the Commission anticipates ruling on these issues before Evergy Kansas Metro's next EER filing in 2026 to provide clarity for the parties.

11. After consideration of Staff's R&R, and the responses from Evergy Kansas Metro and CURB, the Commission finds Staff's R&R should be adopted, with the modification requested by Evergy Kansas Metro as to paragraph 6(a) above.

**THEREFORE, THE COMMISSION ORDERS:**

A. Evergy Kansas Metro is authorized recovery of a revised KEEIA EER amount of \$4,299,543, including \$2,329,241 from residential customers and \$1,970,303 from nonresidential customers, and a revised KEEIA EER factor of \$0.00078/kWh for residential customers and \$0.00056/kWh for non-residential customers, effective October 15, 2025, through September 30, 2026.

B. Evergy Kansas Metro shall file its next KEEIA EER in June 2026, to include costs incurred from Commission approved programs for Program Year 1 from May 1, 2025, through July 31, 2025, and Program Year 2 from January 1, 2025, through April 30, 2026. In this filing, Evergy Kansas Metro shall also include a true-up calculation to include the difference between: Actual amounts collected from January 1, 2025, (including legacy program revenue collected prior to the recovery period start date) to April 30, 2026, plus forecasted amounts to be collected from May 1, 2026, to September 30, 2026; and, the approved recovery amounts from the June 15, 2025, filing.

C. The parties will conduct quarterly meetings to allow Staff to ask questions, evaluate program metrics, provide feedback, and to continue to refine the Technical Reference Manual (“TRM”).

D. Evergy Kansas Metro is denied recovery of the TD and EO portions of its request but will have the ability to file for recovery of Plan Year 1 TD and EO in Plan Year 2, if it provides sufficient data to allow Staff to replicate the savings calculations, and resolution of the disputed NMEC minimum requirements in Docket 22-254.

E. The parties have 15 days from the date of electronic service of this Order to petition for reconsideration.<sup>12</sup>

**BY THE COMMISSION IT IS SO ORDERED.**

French, Chairperson; Keen, Commissioner; Kuether, Commissioner.

Dated: 10/09/2025 \_\_\_\_\_



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Celeste Chaney-Tucker  
Executive Director

ARB

<sup>12</sup> K.S.A. 66-118b; K.S.A. 77-529(a)(1).

## **CERTIFICATE OF SERVICE**

25-EKME-504-TAR

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of electronic service on 10/09/2025.

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## **CERTIFICATE OF SERVICE**

25-EKME-504-TAR

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