

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. FOR)
APPROVAL TO MAKE CERTAIN CHANGES)
IN THEIR CHARGES FOR ELECTRIC SERVICE)
PURSUANT TO K.S.A. 66-117.)

DOCKET NO. 25-EKCE-294-RTS

DIRECT TESTIMONY

JOSH FRANTZ

ON BEHALF OF

THE CITIZENS' UTILITY RATEPAYER BOARD

JUNE 6, 2025

I. Statement of Qualifications

Q. State your name, employer, and business address.

A. My name is Joshua (Josh) Frantz. I am employed by the Citizens' Utility Ratepayer Board (CURB) as a Senior Regulatory Analyst. My business address is 1500 SW Arrowhead Road, Topeka, Kansas 66604.

Q. Describe your educational background and qualifications.

A. I earned a Master of Business Administration degree from Washburn University of Topeka, Kansas. I also earned a Bachelor of Business Administration degree from Washburn University. My undergraduate majors were finance, marketing, and management.

Q. Describe your professional background and qualifications.

A. Since April 2019, I have served in my current position as Senior Regulatory Analyst with CURB.

From August 2015–April 2019, I was employed by the Kansas Corporation Commission (KCC or “Commission”) in the Utilities division. I began my employment with the KCC as a Senior Research Economist and was promoted to Managing Rate Analyst.

Q. Have you previously testified before the Commission?

A. Yes. Over the course of my employment with CURB and prior employment with KCC

Staff, I have provided testimony and recommendations in several proceedings before the Commission. A list of my prior filings is available, upon request.

II. Summary of Testimony

Q. What is the purpose of your testimony?

A. My testimony addresses the Stay Connected Pilot (“SCP” or “ESCP”¹) program which is proposed by Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. (together “Company” or “EKC”) in its Application and supported by Kim Winslow in Direct Testimony on behalf of the Company.

III. Stay Connected Pilot

A. Program Overview

Q. Provide an overview of the Company’s proposed SCP program.

A. The SCP is a pilot program designed to relieve financial hardship for qualified (i.e. low-income) residential EKC customers in the form of monthly bill credits. The goal of the program is to help vulnerable customers in the lowest income brackets remain consistent on their accounts and remain connected to electric service.²

¹ Alternately referred to in testimony and exhibits as either the Stay Connected Pilot (SCP) or the Evergy Stay Connected Program (ESCP).

² General Terms and Conditions (“GT&C”) §14.01, Sheet 1 [proposed].

Q. What is the proposed term for the SCP?

A. The SCP is proposed for a three-year pilot term.

Q. How is “Qualified Customer” defined?

A. The proposed tariff defines “Qualified Customer” as a customer receiving residential service under Schedule R, who is classified as income-eligible by Missouri Department of Social Services criteria and whose annual household income is no greater than 250% of the federal poverty level (FPL).³ However, in response to CURB-33, the Company has clarified that it will be using Kansas Department of Children and Families (DCF) criteria, not Missouri criteria, as a guide to qualify EKC participants.

Q. What are the eligibility requirements for the SCP?

A. The SCP is available to customers in the EKC service territory who satisfy the following eligibility requirements:⁴

- Participant must be a customer receiving residential service under the Company’s Schedule R;
- Participant’s annual household income must be verified initially, and annually thereafter, as being no greater than 250% of FPL;
- Participants who have outstanding arrearages will enter into special pay arrangements as mutually agreed to by both the Participant and the Company;
- Participants must provide, via an interview or questionnaire, information related to their energy use and program participation;
- Any provision of the Company’s rules and regulations applicable to the Company’s Schedule R customers will also apply to ESCP participants;
- Participants will not be subject to late payment penalties while participating in the program;

³ GT&C §14.01, Sheet 2 [proposed].

⁴ GT&C §14.01, Sheet 2 [proposed].

- 1 ▪ Participants who have not previously completed an application for the Low Income
- 2 Energy Assistance Program (LIEAP) agree to apply for LIEAP when the program
- 3 becomes available; and
- 4 ▪ Applicants agree to apply for any other available energy savings and assistance
- 5 programs identified by the Company.

6 In response to CURB-74, the Company added that “a copy of the most recent Evergy
7 bill, a copy of the state or federal issued identification, an active Evergy account in good
8 standing and proof of income for all household members 18yrs or older will be required.”

9
10 **Q. How will the Company verify income eligibility?**

11 A. The Salvation Army will be the “agency partner” tasked with verifying the income
12 eligibility and credit placement for each completed application.^{5,6}

13
14 **Q. How is the SCP bill credit amount calculated?**

15 A. Participants will receive a fixed monthly SCP credit in the amount of the most recent 12-
16 month average of bills at their premise, not to exceed \$100 per month. The credit amount
17 will be determined by the Company at the time of enrollment.⁷

18
19 **Q. What is the term limit for participation in the SCP?**

20 A. Participants in the SCP will receive a monthly bill credit for a period of up to 24 months.
21 At the end of the term period, the customer may reapply to participate further in the

⁵ EKC responses to CURB-34 and CURB-74.

⁶ Direct Testimony of Kim Winslow, p. 26 (January 31, 2025) (“Winslow Direct”).

⁷ GT&C §14.01, Sheets 2–3 [proposed].

1 program, through the term of the pilot.⁸

2 In response to CURB-76, the Company clarified that participants solely receiving
3 social security income will be enrolled for 24 months. All other participants will be enrolled
4 for 12 months.

5 In response to CURB-38, the Company clarified that participants would need to re-
6 apply for the program if they moved to a different service address.

7
8 **Q. What is the amount of funding for the SCP?**

9 A. The proposed tariff states that annual ratepayer funding for the SCP is \$2,000,000.⁹
10 However, in response to response to CURB-36, the Company clarified that the estimated
11 annual cost for the SCP is actually \$1.6 million, which is consistent with the Company's
12 corresponding adjustment CS-44 to the customer assistance expenses account.

13
14 **Q. How will the SCP be funded?**

15 A. The Company recommends SCP costs be funded 100% by rate revenues. These costs
16 would be socialized among all residential customers.¹⁰

17
18 **Q. How will any excess program funds be addressed at the end of the pilot term?**

19 A. If program funds in excess of actual program expenses remain at the end of the SCP

⁸ GT&C §14.01, Sheet 1 [proposed].

⁹ GT&C §14.01, Sheet 1 [proposed].

¹⁰ Direct Testimony of Kim Winslow, p. 27.

1 program, they would be carried forward to future SCP expenditures or allocated to another
2 Evergy Kansas rate jurisdiction with a higher SCP demand.¹¹

3
4 **Q. Are there any other aspects of the SCP?**

5 A. Yes, the Company will partner with Promise Pay to assist with Supplemental Nutritional
6 Assistance Program (SNAP) eligibility identification and Low Income Energy Assistance
7 Program (LIEAP) cross promotion. For context, LIEAP and the Low Income Home Energy
8 Assistance Program (LIHEAP) are two distinct, interrelated programs that provide energy
9 bill assistance to low-income households. LIHEAP is the federal program and LIEAP is
10 Kansas's program that distributes the federally funded benefits to eligible households
11 within the state.

12 According to the Company, "the process of promoting LIEAP proactively and in
13 2025 to SNAP recipients, along with the SCP program, allows EKC to more holistically
14 assist customers in the low-income bracket and help them avoid getting into a crisis
15 payment situation."¹²

16
17 **B. Program Evaluation**

18 **Q. Is CURB generally supportive of low-income relief programs, in concept?**

19 A. Yes, in several KCC dockets and before the Kansas Legislature, CURB has advocated for
20 the study of energy burden (the proportion of a household's income spent on energy bills)

¹¹ GT&C §14.01, Sheet 4 [proposed].

¹² Winslow Direct, p. 26.

1 and energy insecurity (the inability to adequately meet basic household energy needs) in
2 Kansas, including the consideration and development of low-income relief programs.

3 Furthermore, CURB represents Kansas as a member of The National Association
4 of State Consumer Advocates (NASUCA). NASUCA strongly supports LIHEAP which
5 provides energy bill assistance to low-income households.

6 Generally speaking, the entire community benefits from its individuals having
7 consistent access and connection to essential utility services. Bill payment assistance can
8 help maintain family stability and improve health outcomes for vulnerable populations,
9 including the elderly and young children.

10 Furthermore, by maintaining the utility service connection of customers who may
11 otherwise be disconnected for non-payment, utility ratepayers can benefit from reductions
12 to overall expenses for disconnection, collections, and bad debt.

13
14 **Q. Do you have any concerns with the proposed EKC SCP program?**

15 A. I appreciate the Company's effort to develop and put forward a bill relief pilot program in
16 Kansas, but I do have several concerns with the proposed SCP program design.

17 **(a) Enrollment Expectations**

18 **Q. Do you expect that SCP enrollment will exceed the Company's projections?**

19 A. Yes, I expect the SCP will exceed the Company's enrollment projections for two primary
20 reasons, as follows.

21 First, the Company estimates that "[a]pproximately 32% of Evergy's KS customers

1 fall below 250% of [FPL].”¹³ For context, EKC’s Residential Standard customer count is
2 626,207 so approximately 32% would be 200,386 customers. Yet, according to Ms.
3 Winslow, the Company only estimates “up to 2,500 customers could be enrolled at any
4 given time in the SCP program.”¹⁴ The projected annual number of participants used to
5 develop the budget was 1,700,¹⁵ even less than Ms. Winslow’s estimation.

6 Second, the entire federal staff who administer LIHEAP were fired on April 1,
7 2025.¹⁶ My expectation is that future federal LIHEAP funding (and thus state LIEAP
8 funding) will significantly diminish from \$4.1 billion nationally and perhaps be eliminated
9 entirely. For context, EKC’s 2024 LIHEAP revenue was \$12.4 million.¹⁷

10 At the very least, there is uncertainty regarding the future of the federal program.
11 Officially, DCF’s LIEAP application page currently states, “The 2025 LIEAP application
12 period has ended. Information regarding the next application period will be provided when
13 it is available.”¹⁸ In response to news outlets, the Company has stated it is “waiting to hear
14 how this program will work moving forward.”¹⁹

15 In response to CURB-75, the Company stated, “In the event that LIHEAP ended or
16 significantly defunded, the importance of a program like Stay Connected would be
17 substantially increased.” I agree with this sentiment, which is part of why I expect SCP

¹³ EKC response to CURB-34.

¹⁴ Winslow Direct, p. 24.

¹⁵ EKC response to CURB-36.

¹⁶ Haigh, S. (Apr. 3, 2025) *Trump administration fires staff of program that helps low-income households pay for heat* Associated Press <https://apnews.com/article/heating-assistance-hhs-layoffs-kennedy-trump-91e466c458ac804b098be00867a92106> Accessed June 6, 2025.

¹⁷ EKC response to CURB-77.

¹⁸ <https://www.dcf.ks.gov/services/ees/Pages/EnergyAssistance.aspx> Accessed June 6, 2025.

¹⁹ EKC response to CURB-78.

enrollment will exceed the Company's projections.

(b) Participation Criteria

Q. What are your concerns regarding the Company's definition of "Qualified Customer"?

A. The Company's definition of Qualified Customer broadly incorporates the income eligibility criteria of DCF; however, some of DCF's criteria appear to be contradictory to the Company's participation criteria stated in the Availability section of the tariff. For example, DCF's LIEAP income eligibility criterion is set at 150% of FPL,²⁰ compared to the Company's proposed 250% threshold of FPL.

Because the Company's requirements for eligibility are presented thoroughly in the Availability section of the tariff, broadly referencing the independent criteria of the DCF in the definition of Qualified Customer is unnecessary (and potentially contradictory) and referencing other eligibility criteria in both the definition of Qualified Customer and the eligibility requirements seems duplicative. Therefore, I recommend the Company's definition of Qualified Customer be revised to the following: "A customer who satisfies the eligibility requirements of the ESCP."

Q. What are your concerns regarding the Company's proposed income eligibility level?

A. The Company is proposing an SCP income eligibility threshold at 250% of FPL. Given the

²⁰ <https://www.dcf.ks.gov/services/ees/Pages/EnergyAssistance.aspx> Accessed June 6, 2025.

1 SCP is the pilot iteration of a low-income bill assistance program for Kansas, I find the
2 Company's request for flexibility to reach "moderate" income households²¹ to be an
3 overreach; particularly given the current uncertainty regarding LIHEAP.

4 The stated purpose of the program is "to relieve the financial hardship experienced
5 by [EKC's] most vulnerable customers." I do not believe it is good public policy, at least
6 initially, for non-participants to contribute to bill relief beyond those parameters.

7 If SCP enrollment exceeds the Company's projections, I believe it would be
8 challenging, both logistically and from a PR perspective, to scale the program down by
9 restricting eligibility and resetting prioritizations to conserve funding for customers in the
10 direst circumstances. The alternative, also undesirable, would be to allow the funds to
11 quickly deplete since the availability of participation is "limited to the available funds,"²²
12 (i.e., first come, first served.)
13

14 **Q. What is your proposed income eligibility criteria?**

15 A. I believe the better approach would be to initiate the pilot with more conservative income
16 eligibility criteria. Therefore, I recommend the SCP income eligibility be set to 200% of
17 FPL. This represents a midpoint between DCF criteria and the Company's proposal and
18 helps balance the considerations discussed above. Furthermore, this figure is consistent
19 with the Evergy Economic Relief Pilot Program (ERPP) offered in Missouri.²³

²¹ EKC response to CURB-33.

²² GT&C §14.01, Sheet 2 [proposed].

²³ EKC response to CURB-34.

(c) Bill Credit Methodology

Q. What are your concerns regarding the Company’s methodology for calculating the SCP bill credit amount?

A. The Company’s use of a 12-month billing average to calculate a fixed monthly credit amount does not align with the seasonality of usage for most residential customers. For summer peaking customers, the designed credit amount will likely be disproportionately low in summer months. In other months, the SCP credit may be large enough to generate a credit balance on the customer’s account which would be applied to the following month’s bill.²⁴

Q. Do you believe it would be especially advantageous for participants in the SCP to enroll in the Average Payment Plan?

A Yes, the Average Payment Plan establishes a monthly billing amount using the average of the prior twelve bills,²⁵ which closely aligns with the Company’s proposed methodology for calculating the SCP bill credit amount.

The Average Payment Plan can be particularly beneficial for low-income ratepayers. Across the industry, such plans are often referred to as “budget billing” because a more consistent utility bill is easier to budget. A predictable expense helps customers avoid potential late payment fees or service disruptions due to unexpectedly high bills.

²⁴ Winslow Direct, p. 26.

²⁵ See <https://www.evergy.com/manage-account/billing/payment-options/average-payment-plan> Accessed June 6, 2025.

1 Thus, the intention of the Average Payment Plan and the goals of the SCP are in alignment.

2
3 **Q. Are you proposing SCP participants should be required to enroll in the Average**
4 **Payment Plan?**

5 A. Yes, although general enrollment in the Average Payment Plan is optional and should
6 remain optional, I propose that enrollment in the Average Payment Plan be required for
7 participation in the SCP. At the very least, if the Commission approves the SCP, I strongly
8 suggest the Company incorporate a strategy to cross-promote the Average Payment Plan
9 at the time of SCP enrollment.

10
11 **Q. Does it concern you that SCP participants could receive electric service “for free”?**

12 A. It does. I do not believe it is good public policy to reduce program participants’ energy bills
13 to \$0 in any given month. “Free” social welfare provisions tend to inordinately trigger
14 opposition from non-participants. Going beyond a \$0 bill, the Company has proposed to
15 carry forward excess bill credits which could further exacerbate some non-participants
16 perception of the program.

17 Given that this is a pilot program, it will be subject to review and modifications
18 after the initial 3-year term has passed and new information has been gathered. If reception
19 to the program is largely positive among participants and non-participants alike,
20 stakeholders could reconsider designs of the program to achieve certain outcomes.

1 **Q. What is your proposed alternative methodology for the calculation of SCP bill**
2 **credits?**

3 A. I propose the bill credit for SCP participants be limited to the lesser of 50% of the monthly
4 bill or \$100. Under my alternative proposal, the monthly bill credit amount would not be a
5 fixed amount.

6 With a 50-50 ratio, non-participants' portion will not be greater than the
7 participants' and participants will still receive significant bill relief.

8 I also retain the \$100 credit maximum proposed by the Company in order to
9 maintain an upper boundary on the amount of assistance per customer within the overall
10 budgetary constraints of the program.

11
12 **(d) Program Budget**

13 **Q. Do you have any concerns regarding the inclusion of administrative costs in the**
14 **program budget?**

15 A. Yes, it is not in ratepayers' interest for the administrative costs of this program, projected
16 at \$175,600 annually,²⁶ to be included in rate base. The proposed budget for the program
17 includes more than just the value of the bill credits. Regarding social welfare programs,
18 one of non-participants' or donors' general concerns is how much of the funds are actually
19 received by participants. This is particularly true in non-voluntary programs. As proposed,
20 SCP funds would not be transferred to participants at a 1:1 ratio because the program funds

²⁶ See EKC response to CURB-36.

1 will also be used to support its administration.

2 If the administrative costs of this program were excluded from cost recovery, I
3 believe it would greatly improve the public perception of the program, particularly from
4 non-participants' perspective. Keep in mind that Ms. Winslow's testimony touts Evergy is
5 "committed to the communities it serves."²⁷ As proposed, it is residential ratepayers who
6 would be fully committed to the SCP.

7
8 **Q. Should shareholders fund the administrative costs of the SCP?**

9 A. Yes, I propose that shareholders fund the administrative costs of the SCP so that all
10 program funds can be distributed as bill credits, thereby maximizing the efficacy of non-
11 participants' contributions.

12
13 **Q. Given the changes you are recommending to the SCP, are you suggesting any changes**
14 **to the total amount of the program budget?**

15 A. No, I am not recommending an adjustment to the total \$1.6 million budget of the program,
16 so long as the \$1.6 million is applied entirely for bill credits.

17 As discussed above, I expect participation in the program will exceed projections,
18 particularly with the current uncertainty surrounding LIHEAP. To that extent, the proposed
19 total budget amount of \$1.6 million is still agreeable for the pilot term of the program.

²⁷ Winslow Direct, p. 29.

1 **Q. If there are SCP funds remaining at the end of the term, what do you propose?**

2 A. If excess program funds remain at the end of the SCP pilot term, but the program is renewed
3 or continues in a modified manner, then the funds should be carried forward for the next
4 iteration. However, I do not support the allocation of excess funds to “another Evergy
5 Kansas rate jurisdiction with a higher SCP demand”²⁸ in the event the SCP is terminated
6 entirely. In such a scenario, excess funds should be returned to EKC customers.

7
8 **(f) Reduction of Bad Debt and Disconnections**

9 **Q. Do you expect the SCP will result in a reduction of costs associated with bad debt and**
10 **disconnection?**

11 A. Yes, as is implied by the name of the program, I believe SCP participants will be more
12 likely to stay connected and avoid disconnection due to non-payment. This should result
13 in reduction of costs for the Company related to bad debt and disconnection efforts.

14
15 **Q. Has the Company conducted studies on how assistance programs affect bad debt**
16 **write offs?**

17 A. No, in its response to CURB-39, the Company indicated it has not conducted any studies
18 or estimations regarding the impact of the SCP or similar assistance programs on bad debt
19 write-offs.

20 Relatedly though, Company has reported that a review of Evergy’s Missouri ERPP

²⁸ GT&C §14.01, Sheet 4 [proposed].

1 showed “approximately 15% of participating customers enter into threat of disconnect
2 whereas the national average of those struggling to pay their utilities is between 25% -
3 30%.”^{29,30}

4
5 **Q. Do you believe the Company expects the SCP will reduce overall costs?**

6 A. Yes, I believe so. Ms. Winslow directly stated, “The SCP program is aimed at helping
7 income-eligible customers stay connected on their accounts by relieving some of their
8 financial burden while reducing overall costs to all EKC customers.”

9
10 **Q. Do you expect the SCP will increase revenue to the Company?**

11 A. Yes, under the presumption that the SCP will successfully reduce disconnections, the
12 Company will also receive additional revenue from customers for continued usage over the
13 period they would otherwise have been disconnected from service.

14
15 **Q. Should the Company financially benefit from the SCP?**

16 A. No, the Company should not financially benefit from the SCP, particularly given the fact
17 that the program is proposed to be 100% funded by ratepayers.³¹

²⁹ Winslow Direct, p. 26.

³⁰ EKC response to CURB-39.

³¹ Winslow Direct, p. 26.

1 **Q. Has the Company accounted for reductions to bad debt or increases in revenue caused**
2 **by the SCP?**

3 A. Not to my knowledge.
4

5 **Q. Should reductions to bad debt and increases in revenue caused by the SCP be**
6 **accounted for?**

7 A. Yes, they should, and doing so would benefit residential ratepayers in both circumstances.
8 However, it is difficult to directly attribute reductions in bad debt or fewer disconnections
9 to the program. There are many externalities that affect customers' financial circumstance,
10 both broadly (e.g., inflation) and customer-specific (e.g., medical expenses).
11

12 **Q. Do you have a specific proposal or adjustment to account for reductions to bad debt**
13 **and increases in revenue caused by the SCP?**

14 A. No, I have not developed a specific adjustment or proposal to account for reductions to bad
15 debt or increases in revenue caused by the SCP. My position at this time is simply that
16 these benefits of the SCP exist and should be accounted for. My intent is to highlight the
17 issue for discussion during settlement negotiations.
18

19 **IV. Recommendation**

20 **Q. Please summarize your recommendations.**

21 A. I am proposing the following modifications to the SCP:

- 1 ▪ The definition of Qualified Customer should be revised to the following: “A customer
- 2 who satisfies the eligibility requirements of the ESCP.”
- 3 ▪ The SCP income eligibility threshold should be 200% of FPL.
- 4 ▪ SCP participants should be required to enroll in the Average Payment Plan.
- 5 ▪ The monthly bill credit for SCP participants should be limited to the lesser of 50% of
- 6 the monthly bill or \$100.
- 7 ▪ Shareholders should fund the administrative costs of the SCP in order that all program
- 8 funds can be distributed as bill credits.
- 9 ▪ In the event the SCP is terminated entirely at the end of the pilot term, any excess
- 10 program funds should be returned to EKC customers.
- 11 ▪ The Company should not financially benefit from the SCP. Reductions to bad debt and
- 12 increases in revenue caused by the SCP should be accounted for.

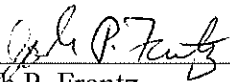
13
14 **Q. Does this conclude your testimony?**

15 **A. Yes.**

VERIFICATION

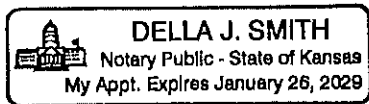
STATE OF KANSAS)
)
COUNTY OF SHAWNEE) ss:

I, Josh P. Frantz, of lawful age and being first duly sworn upon my oath, state that I am a Senior Regulatory Analyst for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.



Josh P. Frantz

SUBSCRIBED AND SWORN to before me this 5th day of June, 2025.





Notary Public

My Commission expires: 01-26-2029.

APPENDIX

REFERENCED DATA REQUEST RESPONSES

CURB-33

CURB-34

CURB-36*

CURB-38

CURB-39*

CURB-74

CURB-75

CURB-76

CURB-77*

CURB-78

*** Confidential attachments not included**



Evergy Kansas Central
Case Name: 2025 KS Central Rate Case
Case Number: 25-EKCE-294-RTS

Requestor Astrab Joseph -
Response Provided April 10, 2025

Question:CURB-33

The ESCP tariff defines a qualified customer as, in part, “classified as income- eligible by the Missouri Department of Social Services criteria....”

- a)Why has Evergy chosen Missouri-based criteria rather than Kansas to qualify EKC participants?
- b)Provide the Missouri Department of Social Services income-eligible criteria.
- c)Please provide the equivalent income-eligible criteria for Kansas, if available.

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:

- a. Evergy will be using the KS Department of Children and Families criteria as a guide to qualify EKC participants (ex.SNAP and LIEAP). This information will be updated in the ESCP tariff.
- b. Currently the Missouri Department of Social Services utilizes 60% of the state median income for program income guidelines. This allows for a family of three in Missouri to have an income of \$53,340 annually.
- c. The income guideline for the ESCP will be 250% of the Federal Poverty Level which would allow for a family of three in Kansas to have an income of \$66,625. This allows the program to have slightly more flexibility in reaching low and moderate income households.

Information provided by: Maria Lopez

Attachment(s): n/a



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 Kansas Central
Case Name: 2025 KS Central Rate Case
Case Number: 25-EKCE-294-RTS

Requestor Astrab Joseph -
Response Provided April 10, 2025

Question:CURB-34

Regarding ESCP eligibility:

- a) Provide the Company's rationale and justification for setting the ESCP income threshold to greater than 250% of the federal poverty level. Please compare this to any similar Evergy program income qualification criteria in other service territories.
- b) Describe the process by which the Company will verify ESCP participants' incomes initially and annually thereafter.
- c) Describe the program eligibility guidelines for the ESCP as it relates to applicants in circumstances of temporary unemployment.
- d) Describe the program eligibility guidelines for the ESCP as it relates to applicants with independent roommates. For example, multiple college students with part-time employment living together in a residential rental unit with one such individual (the applicant) being the primary Evergy account holder.

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:

- a. Approximately 32% of Evergy's KS customers fall below 250% of the federal poverty level (FPL). Setting the income guideline for the ESCP at 250% of the federal poverty level would capture customers in the low to moderate income range and expand the support net to more customers. In comparison to other KS assistance programs, KS LIEAP is 150% FPL, Project Deserve (KS) is 130% FPL, Evergy Cares is 200% FPL and Dollar Aide (MO) is 200% FPL. In Evergy's MO territory, MO LIHEAP is 60% of the state median income and the Evergy Economic Relief Pilot Program (ERPP - MO) is 200% FPL.
- b. Similar to Evergy's ERPP, an agency partner will be tasked with verifying the income eligibility of each completed application.
- c. The ESCP will require a new application at 12 months so income eligibility will be checked at that time.



- d. The ESCP application will ask for all adults in the household to be listed. The combined income for all adults cannot exceed 250% of the federal poverty level.

Information provided by: Maria Lopez

Attachment(s): n/a

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 Kansas Central
Case Name: 2025 KS Central Rate Case
Case Number: 25-EKCE-294-RTS

Requestor Astrab Joseph -
Response Provided April 10, 2025

Question:CURB-38

If an ESCP participant transfers service to a new premise (i.e., changes residence) within the EKC territory, does this impact the customer's ESCP eligibility or the amount of the monthly credit?

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:

An ESCP participant will need to re-apply for the program if they move to a different service address.

Information provided by: Maria Lopez

Attachment(s): n/a

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 Kansas Central
Case Name: 2025 KS Central Rate Case
Case Number: 25-EKCE-294-RTS

Requestor Astrab Joseph -
Response Provided May 06, 2025

Question:CURB-74

Follow-up to CURB-34b: Has Evergy selected an “agency partner” tasked with verifying the income eligibility of each ESCP applicant? If so, please name the partner and describe the eligibility verification process.

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:

Evergy is in discussions with the Salvation Army of Kansas and Western Missouri. This agency currently manages Evergy’s Missouri Economic Relief Pilot Program (ERPP). The eligibility verification process for Stay Connected will be similar to ERPP. A copy of the most recent Evergy bill, a copy of the state or federal issued identification, an active Evergy account in good standing and proof of income for all household members 18yrs or older will be required.

Information provided by: Maria Lopez

Attachment(s): n/a

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 Kansas Central
Case Name: 2025 KS Central Rate Case
Case Number: 25-EKCE-294-RTS

Requestor Astrab Joseph -
Response Provided May 06, 2025

Question:CURB-75

If LIHEAP and/or SNAP were ended or significantly defunded, please broadly describe how that would affect the implementation and scope of the ESCP. As part of this discussion, please describe how such scenarios would affect the role and budget for PromisePay.

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:

In the event that LIHEAP ended or significantly defunded, the importance of a program like Stay Connected would be substantially increased. The implementation of Stay Connected would go on as scheduled, with no changes to the monthly credit amount or eligibility requirements. Promise Pay would maintain its responsibility for outreach related to KS LIHEAP, provided the program remains operational. In the event LIHEAP were ended, Evergy would terminate the LIHEAP outreach portion of the program.

Information provided by: Maria Lopez

Attachment(s): n/a

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).

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Requestor Astrab Joseph -
Response Provided May 06, 2025

Question:CURB-76

Ms. Winslow states on p. 25 of Direct Testimony, “The monthly bill credit will be calculated based on the customer’s average monthly bill during the preceding 12-month period and estimated income level.” Precisely how is a qualifying ESCP applicant’s estimated income level incorporated into the calculation of their monthly bill credit?

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:

The income guideline for the ESCP will be set at or below 250% of the federal poverty level. If the customer is eligible and accepted into the program, the customer’s monthly credit will be determined by their previous 12-month average and the ESCP credit amount will not exceed the average bill amount, nor the \$100 maximum monthly amount.

The program enrollment period will be based on the type of income. Those solely receiving social security income will be enrolled for 24 months. All other customers will be required to reapply after 12 months.

Information provided by: Maria Lopez

Attachment(s): n/a



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*
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Requestor Astrab Joseph -
Response Provided May 06, 2025

Question:CURB-78

According to multiple news sources, all LIHEAP staff were laid off in April 2025. Please provide copies of all public outreach (ex., press releases, social media, mail) from Evergy regarding LIHEAP since April 1, 2025. Please supplement this response if additional public outreach is distributed.

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:

The KS LIEAP season concluded March 31st. All promotion and information regarding LIEAP on our website, social channels, press releases and bill inserts ended prior to April 2025. While Evergy did not extend its own news releases on the issue, the Company did provide the following statement to news outlets:

The Low-income Home Energy Assistance Program (LIHEAP) is an important program that assists some of our communities' most vulnerable residents. Kansas and Missouri have 2025 program funds that have already been received and are available to distribute to qualified customers. The Kansas state application window ended March 31. Missouri's application window is still open. Evergy is working with our national trade association, and we are waiting to hear how this program will work moving forward.

Information provided by: Maria Lopez

Attachment(s): n/a



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-294-RTS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 6th day of June, 2025, to the following:

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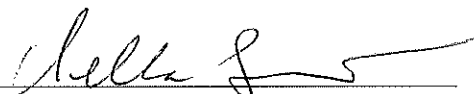
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