CURB News

News from the Watchdog for Residential and Small Commercial Utility Consumers

July 2022

THE CITIZENS' UTILITY RATEPAYER BOARD OF KANSAS

UPDATE: Parties File Written Testimony on Evergy's Application for a New Energy Efficiency Program Portfolio

KCC Docket No. 21-EKME-254-TAR

CURB, Kansas Corporation Commission ("KCC" or "Commission") Staff, and several intervening parties have filed pre-written direct and cross-answering testimony regarding Evergy's application to implement a new portfolio of energy efficiency programs and rebates for customers. CURB retained the services of Synapse Energy Economics, Inc. to review the application and provide technical support and analyses. Synapse is a consulting company that has worked with numerous governmental organizations and consumer interest groups on issues of energy efficiency development and policy. Through this collaboration, CURB has recommended that the Commission approve the creation of Evergy's new energy efficiency program with a number of modifications for future performance.

In its testimony, CURB indicates support for creating new energy efficiency opportunities for customers. CURB believes that cost-effective and accessible energy efficiency programs can reduce the need to rely on spending for new generation facilities to meet customer demand. Kansans are eager to participate in programs that allow for low-cost weatherization upgrades and other measures to lower energy bills. In CURB's view, Evergy's application is a good start to building up Kansas's energy efficiency profile, but there are several areas for modification to improve the benefits for ratepayers. First, a robust energy efficiency program should be supported and maintained by extensive evaluation and transparency. The costs and benefits calculations for each aspect of the portfolio can be traced back to Evergy's Technical Resource Manual (TRM). The TRM contains values for thousands of items and factors that are used to calculate the projected savings and costs for each program. However, many of these values in the TRM do not have a clear source from which the value was derived. This presents difficulty for interested parties looking to analyze the accuracy or methodology of any particular component. CURB is advocating for more transparency in future reviews of the portfolio, which includes a more detailed view of the TRM values and additional layers of third-party evaluations

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MAJOR CASES WE ARE CURRENTLY FOLLOWING:

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- **22-EKME-254-TAR** Evergy – Energy Efficiency Programs
- **22-NETE-419-COC** NextEra Transmission Facilities

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of the programs.

Second, CURB has concerns about the overall bill impact this may have on customers. As part of the application, Evergy is requesting approval of the use of rates that track and effectively reimburses Evergy for the lost revenue associated with the foregone sale of electricity that is inherent with energy efficiency programs. Further, Evergy's application includes the use of performance incentives for Evergy to earn an additional return on investments if Evergy invests or if participation levels pass certain thresholds. Instead, CURB believes that such awards should be tied to the results of energy efficiency efforts, such as reduced consumption or bill savings, rather than the sheer amount of resources invested. An action-oriented approach properly aligns the utility's interests and motivations to provide the programs with the ratepayers' interests in experiencing meaningful results from participation. CURB anticipates that some populations of ratepayers may be unable to utilize Evergy's offerings or to fully realize the proposed level of benefits for any number of reasons. Low-income homeowners and renters may not have the resources to dedicate for any initial investment costs or efforts. CURB is concerned that non-participants will be ultimately subsidizing the programs for others. To that end, CURB recommends that the KCC consider limiting the amount that Evergy is allowed to earn on lost revenues and performance incentives in order to minimize the impact of such a scenario.

CURB, KCC Staff, and several intervenors participated in settlement negotiations during the week of July 25. An evidentiary hearing is scheduled before the KCC from August 9 through August 11. The public will be able to listen in on this hearing via the KCC's YouTube page, accessible through the KCC website. A Commission order on this matter is due October 21, 2022.

UPDATE: Commission Approved Non-Unanimous Settlement Agreement for Evergy's Recovery of Winter Storm Uri Costs

KCC Docket No. 21-EKME-329-GIE

On June 23, 2022, the Commission approved a non-unanimous settlement agreement which resolves the recovery of extraordinary costs incurred by Evergy Kansas Central and the payment of excess revenues received by Evergy Kansas Metro (together, "Evergy") in connection with Winter Storm Uri. Winter Storm Uri was an extremely harsh storm. During Winter Storm Uri, many parts of Kansas (including the Evergy Kansas service territories) suffered thirteen straight days of freezing temperatures, with temperatures in the single digits or below zero. Natural gas prices in the Central United States reached all-time highs, causing record wholesale electricity costs in the Southwest Power Pool ("SPP"), to which Evergy is a member, to exceed $4,000 per MWh at times.

As Winter Storm Uri began, the Commission ordered Evergy and all other Kansas energy utilities that are subject to Commission regulation to do what they could to ensure that Kansans continued to have heat and light during the storm. The Commission also ordered Evergy and the other jurisdictional utilities to keep track of the extraordinary costs the utilities incurred in meeting the Commission's order and to provide a plan by which these costs could be recovered without undue hardship upon utility consumers. The Commission opened specific

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dockets for each jurisdictional utility, and in the case of Evergy, it assigned Docket No. 21-EKME-329-GIE ("Docket 21-329").

CURB intervened in Docket 21-329 for the purpose of representing the residential and small commercial ratepayers. As did many other Kansans, CURB recognized the extraordinary circumstances facing Kansas due to Winter Storm Uri. It was an important fact that Evergy was able to maintain power throughout its system except in connection with directions from SPP to cycle power during certain times to ensure that power was stable throughout the region and due to a very few technical and unforeseeable glitches. It remains CURB's view that utilities have an obligation to maintain reliable power to its customers if that is reasonably possible. However, CURB further recognized that Evergy would likely incur extraordinary costs in meeting that obligation.

In these regards, the evidence showed that every utility in the mid-west region incurred extreme costs in keeping power on for their customers. In fact, Evergy Kansas Metro fared better than other utilities in the SPP region in terms of costs. The Commission found that due to off-system sales margins of $82.2 million, Evergy Kansas Metro's total energy costs and off-system sales margins for February 2021 were actually $44.6 million less than its historical three-year average of fuel and purchased power costs and off-system sales margins for February. Evergy Kansas Central performed better than average compared to other utilizes in the SPP region, but still incurred $33.7 million of fuel costs and $113.1 million of purchased power costs in excess of its three-year average.

In view of the highly unusual circumstances that Winter Storm Uri posed, and after its investigation into Evergy's fuel procurement practices, CURB could not find evidence that Evergy had acted imprudently during Winter Storm Uri. In fact, no party proffered any evidence to suggest imprudence during the emergency conditions. That was an important aspect to CURB which allowed it to resolve the 21-329 docket.

The second matter of high importance to CURB was ensuring that Evergy filed a plan by which recovery of extraordinary fuel costs these utilities incurred during Winter Storm Uri would not unduly burden ratepayers. CURB worked with the KCC Staff and Evergy to formulate a plan by which this goal would be accomplished. The Non-Unanimous Settlement Agreement set forth that plan.

In principle, the Non-Unanimous Settlement Agreement provided that Evergy Kansas Central shall recover its Winter Storm Uri extraordinary fuel costs through its Retail Electric Cost Adjustment mechanism ("RECA") (which Evergy uses to adjust for changes in its fuel costs) over a two-year period beginning with the implementation of its Annual Cost Adjustment ("ACA") that it will file in March 2023. Those extraordinary fuel costs shall bear interest at the annual rate of 1.00% beginning at the time when they were accumulated into the regulatory asset account began to accrue through March 2023 when Evergy Kansas Central begins to recover the regulatory asset from ratepayers. Once recovery through the RECA begins, there will be no carrying charge applied to unrecovered costs. The extraordinary fuel costs will be recovered on a volumetric basis, estimated at an average of approximately $2.81 per month for the average residential consumer – albeit volumes consumers use will swing during the year from summer months to winter months.

Regarding Evergy Kansas Metro, the Non-Unanimous Settlement Agreement provided that Evergy Kansas Metro shall return the excess revenues (over its fuel costs) that it received during Winter Storm Uri through

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its RECA over a one-year period beginning with the implementation of its ACA that it will file in March 2023. Evergy Kansas Metro shall apply carrying charges to the calculation of the regulatory liability account at the annual rate of 1.00% beginning at the time the regulatory liability account began to accrue through March 2023 when Evergy Kansas Central begins to recover the regulatory asset from ratepayers.

The Non-Unanimous Settlement Agreement also provided that Evergy shall work with CURB concerning notices pertaining to the resolution of this issue as regarding residential and small commercial ratepayers. Evergy also agreed to work with CURB on statutory language which would allow low-income rate assistance, as it has been working with CURB on this issue for some time. The Non-Unanimous Settlement Agreement also provided for certain improvements to be made to help avoid the incurrence of extraordinary fuel costs in the event of another severe weather event.

In CURB's view, the low interest rate approved in Docket 21-329 and Evergy's pledge to work on statutory authorization for low-income rate assistance will help to minimize the burden that ratepayers may experience with these costs. Although nobody enjoys high bills associated with any extreme weather event, Evergy's system maintained service so that consumers could use the energy they needed to stay warm through Winter Storm Uri. Therefore, CURB joined the Non-Unanimous Settlement Agreement as reasonable under the extreme circumstances. The KCC Staff, Evergy, and Kansas Electric Power Cooperative, Inc. were also signatories to the agreement.

However, the Natural Gas Transportation Customer Coalition; Kansas Industrial Consumers Group); Coffeeville Resources Refining & Marketing; and USD 259 Sedgwick County, Kansas (collectively, the "opponents") opposed the Non-Unanimous Settlement Agreement. Therefore, the Commission scheduled a hearing on May 11, 2022, when all proponents and opponents to the Non-Unanimous Settlement Agreement could present evidence as to whether the Commission should approve the same.

At the hearing, the opponents argued that they were assigned too much of a share of the Winter Storm Uri extraordinary costs incurred by Evergy Kansas Central. They argued that these costs should be assigned to the various rate classes based upon usage during the period from February 12 through February 16, 2021. They argued that industrial customers all conserved energy during that period of time and to use the RECA to recover Winter Storm Uri costs would unduly penalize them. However, the evidence showed that every rate class in the Evergy Kansas Central system had some ratepayers who attempted to conserve energy during Winter Storm Uri and some who did not. Moreover, the extraordinary fuel costs incurred by Evergy Kansas Central occurred throughout the month of February, not just from February 12 through February 16. Finally, CURB and others pointed out that all Evergy customers benefitted from reliability during the extreme winter event and should fairly be responsible for these costs; and the RECA was a reasonable means by which to recover those costs from all Evergy Kansas Central customers.

In its order approving the Non-Unanimous Settlement Agreement, the Commission found that Docket 21-329 involves extraordinary costs incurred to maintain the integrity of the entire electric system and to prevent a cascading collapse that would have been catastrophic for every customer class. Therefore, it is reasonable to spread the costs across the classes. The Commission further found that using the RECA to handle the under-

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recovery of costs from Evergy Kansas Central customers and the over-recovery of costs from Evergy Kansas Metro customers is appropriate and conforms to applicable law. Upon these and other bases, the Commission found that the Non-Unanimous Settlement Agreement met its criteria for its determination that the agreement was just and reasonable, allowing it to be approved in accordance with Kansas law.

Kansas Gas Service and Atmos Request to Securitize Extraordinary Costs from Winter Storm Uri

KCC Docket Nos. 22-KGSG-466-TAR and 22-ATMG-538-TAR

During February 2021, sub-zero temperatures and increased demand for electricity and natural gas caused by Winter Storm Uri placed significant stress on utilities. Meanwhile, wholesale natural gas prices increased up to hundreds of times higher than normal.

Using traditional rate-making treatment to recover the extraordinary costs associated with Winter Storm Uri would result in extreme customer rate impacts. Therefore, both Kansas Gas Service (KGS) and Atmos Energy (Atmos) have requested to securitize the extraordinary costs. Under securitization, Securitized Utility Tariff Bonds would be issued to finance the qualified extraordinary costs (QECs). These bonds can result in lower carrying charges than customary rate-making over an extended repayment period.

KGS Securitization Plan

On March 31, 2022, in Docket No. 22-KGSG-466-TAR, Kansas Gas Service (KGS) filed its initial plan to securitize QECs associated with Winter Storm Uri.

On July 14, 2022, a unanimous settlement agreement was reached between KGS, KCC Staff, and CURB.

Per the Agreement, Kansas Gas Service would be authorized to recover an estimated $328,264,080 of QECs through the issuance of securitized customer backed bonds. KGS would be allowed flexibility to issue securitized bonds with a scheduled final maturity of between seven to ten years.

The issuance of securitized bonds to recover the QECs from the Winter Event is expected to provide net quantifiable rate benefits to customers, estimated in the range of $35 million to $46 million based on KGS's most recent estimates of securitized bond interest rates from seven to ten years as compared to recovering the QECs using traditional ratemaking methods. KGS has formulated a fixed charge by class, allocated based upon each class's percentage of total February sales volumes. Residential customers would face a monthly charge of approximately $4.87–$6.42 for a period of seven to ten years, respectively, if securitized bonds were issued. This compares to $9.04 per month if these costs were recovered over a five-year period using traditional ratemaking.

CURB is concerned over the impact of rising energy bills on low-income customers. Low-income customers generally have a high energy burden (household energy bills as a percentage of income). CURB success-

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fully negotiated for the Agreement to call for efforts to study and look into ways to alleviate energy burden for the most vulnerable populations.

An evidentiary hearing on this matter is scheduled for August 4, 2022. A Commission order is due by September 27, 2022.

Atmos Securitization Plan

On May 25, 2022, in Docket No. 22-ATMG-538-TAR, Atmos filed its initial plan to securitize its extraordinary costs associated with Winter Storm Uri.

Atmos estimates the amount of extraordinary cost to be securitized is approximately $92.7 million. If ten-year securitized bonds were issued, residential customers would face a monthly fixed charge of approximately $5.87. Whereas, if the costs were recovered over a five-year period using traditional ratemaking, residential customers would face an estimated monthly charge of $10.55.

A settlement on this matter, if reached, is due by September 15, 2022. An evidentiary hearing on this matter is scheduled for September 27–29, 2022. A Commission order is due by November 17, 2022.

In both the KGS and Atmos cases, CURB is troubled that the securitized bond charge to customers would be applied as a fixed charge as opposed to volumetric. Customers have no control over the bill impact of a fixed charge and fixed charges discourage energy conservation. However, CURB recognizes that the utility would be significantly less likely to obtain a favorable rating on securitized bonds with a volumetric charge, which would add considerable interest amounts and substantially reduce net benefits to ratepayers, likely making securitization impractical. Thus, CURB acknowledges the trade-off involved in these cases.

UPDATE: Agreement Reached on NextEra Subsidiary's Application for Certification to Build Transmission Line

KCC Docket No. 22-NETE-419-COC

On February 28, 2022, NextEra Energy Transmission Southwest, LLC ("NEET SW"), a subsidiary of NextEra Energy Transmission, LLC, filed an application with the Commission to obtain a certificate of convenience and necessity ("CCN") as a new transmission-only public utility in Kansas and to construct, own, operate, and maintain bulk electric transmission facilities located in the State of Kansas, pursuant to K.S.A. 66-131. 2. In its application, NEET SW explained how it was selected through the Southwest Power Pool's ("SPP") competitive Transmission Owner Solicitation Process as the Designated Transmission Owner for a new transmission line to resolve transmission congestion issues in the SPP region. NEET SW's proposal creates a 94-mile, single-circuit 345 kV transmission line between the existing Wolf Creek Substation in Coffey County, KS and the Blackberry Substation in Jasper County, MO. Approximately 85 miles of the line will be sited in Kansas. NEET SW's winning bid listed the total cost for the Project at $85.2 million and provided for an early in-service date of January 1, 2025.

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CURB intervened and began reviewing the application and the potential bill impacts this project may have on Kansas ratepayers. At the onset, CURB noted that transmission projects, such as NEET SW's, receive unique ratemaking treatment outside of KCC jurisdiction. SPP and the Federal Energy Regulatory Commission are the entities responsible for overseeing the ratemaking process for interstate transmission. These rates are collected from ratepayers within a particular utility's jurisdiction by that utility. The KCC's role in such transmission planning is to review any new proposals to build in Kansas and ensure that any new project is in the public interest.

In the case of a regional transmission organization like SPP, ratepayers from all states with SPP members are subject to these costs, which are allocated based on a number of factors such as location of a project. As part of this regional outlook, SPP periodically reviews transmission issues that impact "zones" rather than by specific states. This approach produces data on a "zonal" basis, rather than a state-specific or utility-specific basis. Through its transmission planning process, SPP identified Southeast Kansas as an area of substantial transmission congestion issues due to an infrastructure deficiency as set forth in a 2019 report. This congestion contributed to higher prices in the region for electricity from the SPP's integrated marketplace. To address this deficiency, SPP held a competitive bidding process in which bidders submitted proposals to build additional infrastructure. A panel of industry experts graded each proposal on a number of criteria before ultimately recommending NEET SW's proposal to move forward. The panel placed much value on the fact that NEET SW's projected total cost was approximately 50% of the estimation made by SPP in its 2019 report.

In June 2022, several intervening parties filed direct and cross-answering testimony in response to NEET SW's proposal. Among the comments, parties thoroughly examined NEET SW's capabilities to build and operate the transmission line and cost containment measures related to preventing significant cost overruns. Some parties expressed concerns over the lack of information and study available to the KCC regarding Kansas-specific costs and benefits. SPP acknowledged that it does not perform state-specific analyses in its transmission planning due to the regional nature of its operations to facilitate interstate transmission. Other parties had concerns with the potential use of eminent domain to seize land in order to build the project and raised concerns about the line being used to send energy generated in Kansas to other states. In its cross-answering testimony, CURB recognized these concerns regarding Kansas-specific data, and even highlighted the KCC's own efforts to obtain this level of analysis from SPP. As part of that observation, CURB noted that the KCC has recognized that the SPP membership provides net benefits to Kansas, even if every single project undertaken by SPP does not directly benefit the state. CURB identified an example of this unmeasured benefit by reference of the 2021 Winter Event and SPP's coordination with utilities to minimize uncontrolled outages and maintained service. In light of such findings and analyses by Staff and others, CURB concluded that the project would provide benefits to Kansas in the form of lower transmission prices as a result of reduced line congestion.

On June 6, CURB, Staff, NEET SW, Evergy, SPP, Sunflower Electric Power Corp., and Kansas Electric Power Co-op, Inc. entered into a settlement agreement and asked the KCC to approve NEET SW's application as modified by the agreement. From June 8-9, parties presented live testimony and exhibits before the KCC

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in an evidentiary hearing on whether to approve the settlement agreement. An order on the agreement is due by August 29, 2022.

UPDATE: Commission's Order on Empire's Abbreviated Rate Case

KCC Docket No. 21-EPDE-444-RTS

As mentioned in the April 2022 issue of CURB News, parties had reached a partial Settlement Agreement in this docket and submitted it to the Commission. Parties had been unable to reach agreement regarding the acquisition of the Wind Projects.

An Evidentiary Hearing was held by the Commission on March 8–9, 2022. During the Hearing, CURB's argument was that the Wind Projects were not needed to serve Kansas ratepayers and therefore should not be included in rates. However, if the Commission determined that they should be included in rates, CURB recommended a non-traditional methodology for recovery at a rate substantially lower than that proposed by Empire.

Following the Evidentiary Hearing all parties filed Briefs on the issues.

Unexpectedly, in early May, CURB was notified by Empire that they were considering withdrawing their request regarding the Wind Projects. On May 16, 2022, Empire did file a Motion requesting to withdraw the Wind Projects without prejudice. CURB did not object to the Motion.

As part of the Motion, CURB and KCC Staff retain all rights to object to the inclusion of the costs relating the Wind Projects in Kansas rates in any future proceeding in which Empire renews its request to include the costs of the Wind Projects in Kansas rates. Conversely, CURB and KCC Staff preserve the right to recommend to the Commission that Empire be required to respond to a show cause motion to determine whether the Wind Projects are needed to serve Kansas customers in the event that Empire becomes capacity-deficient or energy-deficient in the future, or that the wind projects become necessary for the provision of efficient and sufficient service.

On May 26, 2022, the Commission issued its Order in the docket. In the Order, the Empire's Motion to Withdraw Request to Recover Acquisition and Operating Costs of Wind Projects in Rates was granted without prejudice. The Commission also approved the Unanimous Partial Settlement as agreed to by the parties.

CURB believes this is a big win for residential and small commercial ratepayers.

Three CURB Members Attend NASUCA Mid-Year Meeting

David Nickel, Consumer Counsel; Joseph Astrab, CURB attorney; and Patrick Orr, CURB Regulatory Analyst attended the mid-year meeting of the National Association of State Utility Consumer Advocates (NASUCA) this past June. CURB has long been a member of NASUCA, along with 54 other member utility con-

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sumer advocate offices. The mid-year meeting was held entirely in person for the first time since the inception of the COVID pandemic. NASUCA meetings provide an opportunity for discourse with other utility consumer advocates about issues which will affect residential and small commercial ratepayers. In addition, the NASUCA meetings have several panelists who discuss important and timely topics in utility regulation.

Some of the topics that panelists discussed at the June mid-year meeting were: methods to analyze and regulate grid modernization expenditures, approaches to cost containment and increasing transparency in transmission spending by utilities, addressing the needs of electric vehicle business fleets as businesses decide to reduce fossil fuel vehicles, and meeting the challenges in reliability caused by increased natural gas costs and the transition from fossil fuel generation to renewable generation. CURB also learned that a number of consumer advocate offices had dealt with the effects of Winter Storm Uri in various manners, including recovery of extraordinary costs associated with that winter event through securitized bonds. Many of the issues that CURB addresses in advocating for Kansas residential and small commercial ratepayers are similar to issues addressed by other consumer advocate offices in several states.

Highlighting the mid-year meeting, Lawrence Berkley National Labs (LBNL) presented a very knowledgeable panel discussing grid modernization. There were a number of important regulatory concepts that the panelist presented. For example, the panel explained the difference between the need for a benefit-costs analysis (BCA) and a least-cost/best fit (LCBF) analysis. A benefit-cost analysis can be used to justify investment in grid modernization. It addresses the issue of whether the benefits of the expenditure in grid modernization exceed the costs. A LCBF analysis presumes the need for the grid modernization expenditure. That analysis attempts to find the least cost investment in grid modernization that best suits the need. In the panel's view, a BCA should be done for grid modernization proposals. They point out that a LCBF analysis cannot address the key issue for consumer advocates, being whether grid modernization pose net benefits to the consumers. Only a BCA can provide an answer to that issue. Moreover, a BCA helps build transparency around that issue.

The LBNL panel discussed various principles associated with economic analysis of grid modernization. Among these were the need for transparency, the requisite of addressing regulatory goals and policies through grid modernization, the value of due consideration of ratepayer equity, and the importance of the application of a life-cycle analysis. Being very mindful of low-income ratepayers, CURB was especially interested in the panel's suggestions regarding how ratepayer equity is important to an economic analysis of investments in grid modernization.

The June mid-year meeting was the first in-person NASUCA meeting that Joseph Astrab and Patrick Orr have been able to attend. Although these members of CURB staff are extremely busy with KCC dockets, they both found the meeting to be very valuable. Meeting other consumer advocates allows CURB staff to reach out to others to gain insight on regulatory issues. Also, the NASUCA panelists often provide "outside of the box" thoughts on important issues that CURB must address in its KCC dockets. Although the meetings are laborious, both Joseph and Patrick expressed their appreciation for the opportunity to learn and confab with other like-interested professionals.

National Association of State Utility Consumer Advocates NASUCA

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About the Citizens' Utility Ratepayer Board (CURB)

Established in 1988, the Citizens' Utility Ratepayer Board (CURB) is an agency focused on advocacy for residential and small commercial utility consumers in Kansas. The Board is composed of five (5) appointed volunteer members representing the four congressional districts in Kansas and one at-large member. CURB was initially founded by the Chairman of the Kansas Corporation Commission upon a perceived need for a stronger consumer advocate. CURB has evolved into an independent agency, currently employing a consumer counsel, two supporting attorneys, two analysts, and two administrative staff.

***OUR MISSION**:* To zealously protect the interests of residential and small commercial utility ratepayers before the Kansas Corporation Commission and the Kansas legislature.

***OUR VISION**:* To protect Kansas residential and small commercial utility ratepayers by promoting the delivery of optimal utility services—being safe, reliable and technically robust, environmentally sensible, cost-effective, and equitably provided to all Kansas utility consumers at just prices.

NOTICE: Melody McCray-Miller, the Board member from the Kansas 4th Congressional District, has resigned from the Board due to time constraints. The Governor is presently searching for her replacement. The remaining Board members are pictured below.