

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Evergy Metro, Inc. d/b/a)	
Evergy Missouri Metro's Demand Side)	
Investment Mechanism Rider Rate)	<u>File No. ER-2020-0154</u>
Adjustment and True-Up Required by)	Tariff No. JE-2020-0093
20 CSR 4240-20.093(4))	

In the Matter of Evergy Missouri West,)	
Inc., d/b/a Evergy Missouri West's)	
Demand Side Investment Mechanism)	<u>File No. ER-2020-0155</u>
Rider Rate Adjustment and True-Up)	Tariff No. JE-2020-0094
Required by 20 CSR 4240-20.093(4))	

**STAFF RESPONSE TO COMMISSION'S ORDER
DIRECTING FILING**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through the undersigned counsel, and for its response to *Order Directing Filing* to the Missouri Public Service Commission ("Commission") respectfully states:

1. On December 23, 2019, Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (collectively referred to as "Evergy") filed a motion requesting permission to supplement its testimony to include a projection of its Cycle 3 Missouri Energy Efficiency Investment Act ("MEEIA 3") costs in the DSIM rider tariff sheets Evergy filed on December 2, 2019.

2. As part of Evergy's motion, it states that it intended to extend the tariff effective dates from February 1, 2020 to March 1, 2020. Evergy also requested that Staff be allowed until February 1, 2020 to submit its recommendation, in order to allow Staff sufficient time to review the filings.

3. The Commission seeks clarification from Staff as to why a Commission order moving the date of Staff's recommendation by 30 days is more advantageous than

the Company withdrawing its existing DSIM filing and filing a new DSIM tariff filing with a March 1, 2020 effective date.

4. Commission Rule 20 CSR 4240-20.093(4) sets the guidelines for Staff filings, requiring a Staff recommendation no later than 30 days after the tariff is filed, as well as requiring the Commission to act within 60 days of the filing, or else the filed tariffs will take effect by operation of law.

5. However, Commission Rule 20 CSR 4240-20.093(14) permits the Commission to grant a variance from any provision of the rule “[u]pon request and for good cause shown” and Commission Rule 20 CSR 4240-2.205 permits the Commission to “grant a variance from or waive any rule or provision of a rule....upon a finding of good cause.”

6. While Evergy could withdraw the original filing and refile on January 1, 2020 to include the projected MEEIA 3 costs, Staff does not believe that to be a superior course of action to granting the variance per Commission Rules 20 CSR 4240-20.093(14) or 20 CSR 4240-2.205.

7. Further, because the variance would grant Staff more time to review Evergy’s filing, Staff has no objection to the Commission granting a variance.

WHEREFORE, Staff respectfully submits this *Response to Commission’s Order Directing Filing*, and prays the Commission accept the same as satisfying the Commission’s *Order Directing Filing*.

Respectfully submitted,

/s/ Travis J. Pringle
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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were mailed, electronically mailed, or hand-delivered to all counsel of record this 26th day of December, 2019.

/s/ Travis J. Pringle