

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

In the Matter of Evergy Metro, Inc. dba)	
Evergy Missouri Metro's Request for)	<u>Case No. ER-2022-0129</u>
Authority to Implement a General Rate)	Tariff No. YE-2022-0200
Increase for Electric Service.)	and YE-2022-0201

In the Matter of Evergy Missouri West,)	
Inc. dba Evergy Missouri West's Request)	<u>Case No. ER-2022-0130</u>
for Authority to Implement a General Rate)	Tariff No. YE-2022-0202
Increase for Electric Service.)	

STAFF STATEMENT OF DISCOVERY DISAGREEMENTS AND CONCERNS

COMES NOW the Staff of the Missouri Public Service Commission and for its *Statement of Discovery Disagreement and Concern*, states as follows:

1. Staff's concerns are as follows:
 - A. DR 113, Quarterly Financial Statements. Needs to be updated to March 31, 2022, in both cases.
 - B. DR 115, Capital Components. Needs to be updated to March 31, 2022, in both cases.
 - C. DR 116, Cost of Capital. Needs to be updated to March 31, 2022, in both cases.
 - D. DR 380, Transource Incentives. Case ER-2022-0129. We simply asked for supporting workpapers for their adjustment.
 - E. DR 379, Transource Incentives. Case ER-2022-0130. We simply asked for supporting workpapers for their adjustment

- F. DR 378: AFUDC rates. Case ER-2022-0129. We asked for the rates. They did not object to the same data request in the 0130 docket.
- G. DRs 373, 378, 380, 384, 386, 388, and 393 in Case No. ER-2022-0129.
- H. DRs 372, 379, 383, 385, 387, and 392 in Case No. ER-2022-0130.
- I. Inadequate response to DR 247.2 (Case ER-2022-0130), follow-up to DR 247 and workpapers of Mr. Bass.
- J. Inadequate response to DR 250.2 (Case ER-2022-0129), follow-up to DR 250 and workpapers of Mr. Bass.
- K. DR 355 in ER-2022-0129. Inadequate response. This request was a follow up to DR 0116. Company provided the Excel Spreadsheet but with no formulas intact.
- L. DR 016 in ER-2022-0130. Inadequate response.
- M. Responses to DRs 115 and 116 were filed as Confidential. The information in both data requests are for previous years (2019, 2020, and 2021) that are publicly available in their 10K's.

2. The requested information is necessary for Staff to prepare its case and to audit the Evergy entities' compliance with applicable Missouri statutes, Commission regulations, orders, and approved stipulations. The Evergy entities objections are inapplicable or incorrect.

WHEREFORE, Staff submits this Statement of Discovery Disagreement or Concern in advance of the Discovery Conference currently scheduled for May 5, 2022 at 10:30 a.m.

Respectfully submitted,

/s/ Kevin A. Thompson

KEVIN A. THOMPSON

Chief Staff Counsel

Mo. Bar No. 36288

P. O. Box 360

Jefferson City, MO 65102

(573) 751-6514 (Telephone)

(573) 522-6969 (Facsimile)

kevin.thompson@psc.mo.gov

/s/ Nicole Mers

Deputy Counsel

Mo. Bar No. 66766

P.O. Box 360

Jefferson City, MO 65102

(573) 751-6651 (Telephone)

(573) 751-9285 (Facsimile)

nicole.mers@psc.mo.gov

**Counsel for Staff of the
Missouri Public Service
Commission**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this **2nd day of May, 2022**, to all parties and/or counsels of records.

/s/ Kevin A. Thompson