

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of Evergy)
Metro, Inc. d/b/a Evergy Missouri Metro and)
Evergy Missouri West, Inc. d/b/a Evergy) File No. EU-2020-0350
Missouri West for an Accounting Authority)
Order Allowing the Companies to Record and)
Preserve Costs Related to COVID-19 Expenses)

**LIST OF ISSUES, LIST AND ORDER OF WITNESSES,
ORDER OF OPENING STATEMENTS, AND
ORDER OF CROSS-EXAMINATION**

COME NOW Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc. (“Evergy Missouri West”) (collectively, “Evergy”), the Staff of the Missouri Public Service Commission (“Staff”), Office of the Public Counsel (“OPC”), Missouri Industrial Energy Consumers (“MIEC”), Midwest Energy Consumers Group (“MECG”), Sierra Club (“Sierra Club”), Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”), National Housing Trust (“NHT”), Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”), Spire Missouri, Inc. (“Spire”), and Missouri-American Water Company (“MAWC”) and respectfully submit the following *List of Issues, List and Order of Witnesses, Order of Opening Statements, and Order of Cross-Examination*:

List of Issues¹:

1. Is the Covid 19 pandemic an extraordinary event within the scope of the Uniform System of Accounts as it has been historically interpreted and applied by the Commission or as subsequently modified by Missouri courts?
2. Should the Commission approve the Application for an accounting authority order (“AAO”) permitting Evergy to accumulate and defer to a regulatory asset for consideration of recovery in future rate case proceedings before the Missouri Public Service Commission (“Commission”) extraordinary costs and financial impacts incurred as a result of the coronavirus disease (“COVID-19”) pandemic?

¹Not all parties agree that all the listed issues are actually issues to be decided in the case.

3. If the Commission determines that an AAO or other deferral accounting mechanism should be ordered in connection with the COVID-19 pandemic, what items should be deferred?
 - a. Uncollectible expense in excess of amounts included in rates in the most recent general rate cases of Evergy Missouri Metro and Evergy Missouri West, respectively?
 - b. Costs incurred in connection with the one- and four-month Pandemic payment plan incentives that the Commission permitted the Company to implement in Case No. EO-2020-0383 (including credits awarded as incentives and costs related to customer communications)?
 - c. Waived late payment fees / reconnection fees to the extent that they fall short of the amount included in rates?
 - d. Information technology-related costs incurred to enable employees to work from home, including hardware, licensing fees and connectivity costs?
 - e. Costs incurred to protect employees unable to work from home, including cleaning supplies, personal protective equipment, temperature testing, employee sequestration preparation (and employee sequestration if that becomes necessary)?
 - f. Lost revenues associated with the reduction of electric usage during the Pandemic? As an alternative, should the Commission order the deferral of pandemic-related lost fixed cost recovery due to the pandemic?
 - g. Other incremental costs or other unfavorable financial impacts resulting from the Pandemic not presently identified?

- h. What pandemic-related savings should be booked as a regulatory liability or included as an offset to the regulatory asset related to the pandemic-financial impacts?
 - i. Should carrying costs be excluded during the deferral period and be considered for inclusion in rates in Evergy's next general rate case?
- 4. Should the Commission adopt a sunset provision in connection with the AAO and, if so, how should it be structured? Should any sunset provision include the opportunity for the AAO to be extended?
- 5. If the Commission adopts an AAO for some or all of the costs and revenues associated with the COVID-19, should the Commission order periodic reporting of information associated with the deferral? If so, what information should be reported and how often?
- 6. Should the Commission adopt the recommendations of NHT related to extension of the moratorium on nonpayment service disconnections, arrearage management programs, long-term payment deferment plans, expansion of the Economic Relief Program, income-eligible energy efficiency plans, suspend credit reporting, suspend disconnection and reconnection fees, or other customer programs?
- 7. Should the Commission adopt any of the customer-specific recommendations of OPC including: 1) waiving disconnection and reconnection fees; 2) ceasing full credit reporting; 3) waiving late payment fees and deposits; 4) expanding payment plans to 12 months or greater; and 5) establishing an arrearage matching program, dollar-for-dollar on bad debt for eligible customers.
- 8. What, if any, other conditions should the Commission adopt in connection with the AAO?

List and Order of Witnesses:

Thursday, November 12, 2020:

9:00 AM: Preliminary Matters

Opening Statements

Every Witness:

Charles Caisley (to be taken out of order starting at 2:00 pm on November 13 unless his travel schedule allow him to participate on the morning of November 12)

Ronald A. Klote

Darrin R. Ives

Staff Witnesses:

Kimberly K. Bolin

Byron M. Murray

Robin Kliethermes

Natelle Dietrich

MIEC/MECG Witness:

Greg R. Meyer (must appear on November 12)

SC Witness:

Cheryl Roberto

OPC Witnesses:

Robert E. Schallenberg

Geoff Marke

David Murray

NHT Witness:

Roger Colton

Friday, November 13, 2020:

9:00 A.M. Testimony, continued as needed.

Order of Opening Statements:

Evergy
Ameren Missouri
Spire
MAWC
Staff
SC
MIEC
MECG
OPC
NHT
Renew Missouri

Order of Cross-Examination:

Evergy Witnesses: Ameren Missouri, Spire, MAWC, Staff, MIEC, MECG, SC, Renew Missouri, OPC and NHT

Staff Witnesses: Evergy, MIEC, MECG, SC, Ameren Missouri, Spire, MAWC, Renew Missouri, OPC, NHT

OPC Witnesses: NHT, Renew Missouri, Ameren Missouri, Spire, MAWC, Evergy, Staff, MIEC, MECG, SC

MIEC/MECG Witness: Evergy, Staff, SC, Ameren Missouri, Spire, MAWC, Renew Missouri, OPC, NHT

SC Witness: Evergy, Staff, MIEC, MECG, Ameren Missouri, Spire, MAWC, Renew Missouri, OPC, NHT

NHT Witness: OPC, Renew Missouri, Ameren Missouri, Spire, MAWC, SC, MIEC, MECG, Staff, Evergy

WHEREFORE, MECG prays on behalf of all of the parties herein that the Commission will accept this List and Order of Witnesses, Order of Opening and Order of Cross-examination.

Respectfully submitted,

David L. Woodsmall, MBE #40747
308 E. High Street, Suite 204
Jefferson City, Missouri 65101
(573) 636-6006 (telephone)
(573) 636-6007 (facsimile)
Internet: david.woodsmall@woodsmalllaw.com

ATTORNEY FOR THE MIDWEST ENERGY
CONSUMERS' GROUP

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this 23rd day of October, 2020, on the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ David L. Woodsmall