

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

In the Matter of the Application of Evergy)
Missouri West, Inc. d/b/a Evergy Missouri)
West for Permission and Approval of a)
Certificate of Public Convenience and)
Necessity Authorizing It to Purchase, Own,)
Operate, Maintain and Otherwise Control and)
Manage an Existing Wind Generation Facility)
in Oklahoma)

File No. EA-2022-0328

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

COMES NOW, the Staff of the Missouri Public Service Commission (“Staff”), on behalf of itself and the parties to this docket, and hereby submits its proposed *List of Issues, Order of Opening Statements, List and Order of Witnesses, and Order of Cross-Examination* in accordance with the Procedural Schedule set for the above-captioned proceeding. With respect to the list of issues, the list is joint. However, the inclusion of an issue in the list does not mean that all parties jointly agree that the matter identified is actually in dispute and/or that a Commission decision on the issue is proper or necessary in this case.

I. List of Issues

A. Does the evidence establish that granting an Operating Certificate of Convenience and Necessity (“CCN”) to Evergy Missouri West, Inc. (“EMW”) to own, operate, and maintain the 198.6 MW wind generation facility located in Woodward, Ellis and Dewey Counties in Oklahoma (“Persimmon Creek” or the “Project”) is necessary or convenient for the public service, pursuant to Section 393.170.2-.3, RSMo, and 20 CSR 4240-20.045(2)-(3)?

1. Is there a need for EMW to operate Persimmon Creek?

2. Does EMW have the financial ability to operate Persimmon Creek?
 3. Is EMW qualified to operate Persimmon Creek?
 4. Is EMW's proposed operation of Persimmon Creek economically feasible?
 5. Does EMW's proposed operation of Persimmon Creek promote the public interest?
- B. If the Commission grants an Operating CCN for the Project, what conditions, if any, should the Commission impose on the CCN?
1. Should a production tax credit tracker be established?
 2. Should the Commission order that EMW track revenues produced by Persimmon Creek for ratemaking purposes?
- C. Should the Commission Order EMW to provide resource-specific economic analysis utilizing reasonable assumptions beyond the IRP results, LCOE estimates, and installed capacity costs in support of future CCN applications?
- D. What, if any, additional project-specific analysis requirements should the Commission Order from EMW for future CCN requests?
- E. Does the evidence establish that authorizing EMW under Section 393.190.1 to complete the asset transfer and merger described in the Application so that it may own and operate Persimmon Creek is not detrimental to the public interest?

II. Order of Opening Statements

Every Missouri West
Renew Missouri
Office of the Public Counsel (OPC)
Staff

III. List and Order of Witnesses

Dority (EMW)
Humphrey (EMW)
Messamore (EMW)

Owen (Renew Missouri)

Seaver (OPC)
Mantle (OPC)

Hull (Staff)
Won (Staff)
Young (Staff)
Lange (Staff)
Fortson (Staff)
Eubanks (Staff)
Luebbert (Staff)

IV. Order of Cross-Examination

EMW Witnesses

Renew Missouri
OPC
Staff

Renew Missouri Witness

EMW
OPC
Staff

OPC Witnesses

Staff
Renew Missouri
EMW

Staff Witnesses

OPC
Renew Missouri
EMW

Respectfully submitted,

/s/ Nicole Mers

Nicole Mers, #66766

Deputy Counsel

Staff Counsel's Office

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CERTIFICATE OF SERVICE

The undersigned certifies by her signature below that on February 9, 2023, she filed the above document in the EFIS file of the Missouri Public Service Commission.

/s/ Nicole Mers