

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

In the Matter of the Tariff Filing to Change the Name of Kansas City Power & Light Company To Evergy Metro, Inc. d/b/a Evergy Missouri Metro.))	File No. EN-2020-0063
))	Tracking No. JE-2020-0045
))	

In the Matter of the Tariff Filing to Change the Name of KCP&L Greater Missouri Operations Company To Evergy Missouri West, Inc. d/b/a Evergy Missouri West))	File No. EN-2020-0064
))	Tracking No. JE-2020-0046
))	

In the Matter of the Tariff Filing to Change the Name of KCP&L Greater Missouri Operations Company (Steam/Heat) To Evergy Missouri West, Inc. d/b/a Evergy Missouri West))	File No. HN-2020-0065
))	Tracking No. JH-2020-0047
))	

**KANSAS CITY POWER & LIGHT COMPANY AND
KCP&L GREATER MISSOURI OPERATIONS COMPANY'S
REQUEST FOR VARIANCE OR WAIVER OF SIXTY-DAY NOTICE**

COME NOW Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively, the “Company”) and for its *Request For Variance or Waiver* from Missouri Public Service Commission (“Commission”) rule 20 CSR 4240-4.017(1) respectfully states as follows:

1. On June 4, 2018, the transactions authorized by the Commission Report and Order dated May 24, 2018 in Case No. EM-2018-0012 closed. As a result, Great Plains Energy Incorporated, a Missouri corporation, was merged with Westar Energy, Inc., a Kansas corporation, and Evergy, Inc. (“Evergy”) was created as a holding company owning, directly and indirectly, subsidiary operating utility companies. Since that time, KCP&L and GMO (direct subsidiaries of Evergy) have decided to change their legal names to, respectively, Evergy Metro, Inc. and Evergy Missouri West, Inc. On a going forward basis, subsequent to the legal name changes, the rate area formerly denominated as KCP&L’s Missouri operations will be known as Evergy Missouri Metro and the rate area formerly denominated as GMO will be known as

Evergy Missouri West. The use of these rate area names will ensure that customers can access the appropriate tariffs for their respective service territories. The adoption notices contained in the tariff sheets filed to initiate this proceeding serve to effectuate this change in rate area names. The proposed effective date of the adoption notices, October 7, 2019, is the first day that customer bills bearing the Evergy brand name (and the Evergy Missouri Metro and Evergy Missouri West rate area names) will be mailed to customers. Although the re-branding initiative has been the subject of extensive planning since the merger closed in June of 2018, the decision on whether or not to go live with the re-branding initiative on October 7, 2019 required point-in-time assessment of the status of execution of those plans, and this go live decision was not, and could not have been, made until mid-August 2019. Therefore, it was not possible for the Company to make a 60-day notice filing of this proceeding under Commission rule 20 CSR 4240-4.017(1).

2. The Company has previously communicated to the Commission Staff (“Staff”) and the Office of the Public Counsel (“OPC”) about the impending name changes and the name changes and general timelines were discussed with the Commission during the June 5, 2019 update session regarding the merger of Great Plains Energy Incorporated and Westar Energy, Inc. conducted in Case No. EM-2018-0012. See Attachment A, pp. 13-18. No other communication with the office of the Commission regarding the impending name change or any substantive issue likely to be in the case has occurred within the prior one hundred fifty (150) days. Any delay in the filing and processing of these adoption notices would cause harm to the Company by extending the period of time before it can operate under the Evergy brand and with the new rate area names Evergy Missouri Metro and Evergy Missouri West and this would not serve the best interest of their customers. Accordingly, good cause exists, pursuant to 20 CSR 4240-4.017(1)(D), to grant a waiver of 20 CSR 4240-4.017(1).

WHEREFORE, Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company request the Commission issue an order granting the Company a variance or waiver of Commission Rule 20 CSR 4240-4.017(1).

Respectfully submitted,

/s/ Robert J. Hack

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Roger W. Steiner, MBN 39586
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Telephone: (816) 556-2314
Facsimile: (816) 556-2787
E-Mail: Rob.Hack@evergy.com
Roger.Steiner@evergy.com

**Attorneys for Kansas City Power & Light
Company and KCP&L Greater Missouri
Operations Company**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served upon the parties listed below on this 6th day of September 2019, by either e-mail or U.S. Mail, postage prepaid.

Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

Office of the Public Counsel
P.O. Box 2230
Jefferson City, MO 65102
opcservice@opc.mo.gov

/s/ Robert J. Hack

Attorney for Kansas City Power & Light Company
and KCP&L Greater Missouri Operations Company

VERIFICATION

STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

I, Darrin R. Ives, being duly affirmed according to the law, depose and state that I am Vice President – Regulatory Affairs for Kansas City Power & Light Company and that I am authorized to make this verification on behalf of KCP&L and GMO, and that the facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief.



Darrin R. Ives
Vice President – Regulatory Affairs

Subscribed and sworn to me this 6th day of September 2019.


Notary Public

My commission expires:

4/26/2021





MPSC Integration Success Update

06/05/2019 – Public

Integration and Merger Commitments Update

Major Merger Commitments Update

- Merger Closed June 4, 2018
- Provided \$300k to community action agencies
- Distributed bill credits to Missouri customers
 - ~\$14.9M – KCP&L-MO
 - ~\$14.2M – GMO
- Included ~\$3M-KCP&L-MO and ~\$6M-GMO merger savings in rate case settlements
- Completed voluntary severance programs consistent with no-layoffs
 - IBEW 1523 and 412 – Power Plant Closures
 - Participants exited service end of 4Q 2018
 - Evergy Non-Union Voluntary Exit Program (VEP)
 - Participants exiting service 2Q 2019 – 2Q 2020
- Worked closely with Staff and OPC to submit an RFP and select provider for independent 3rd party audit of affiliate transactions and corporate cost allocations

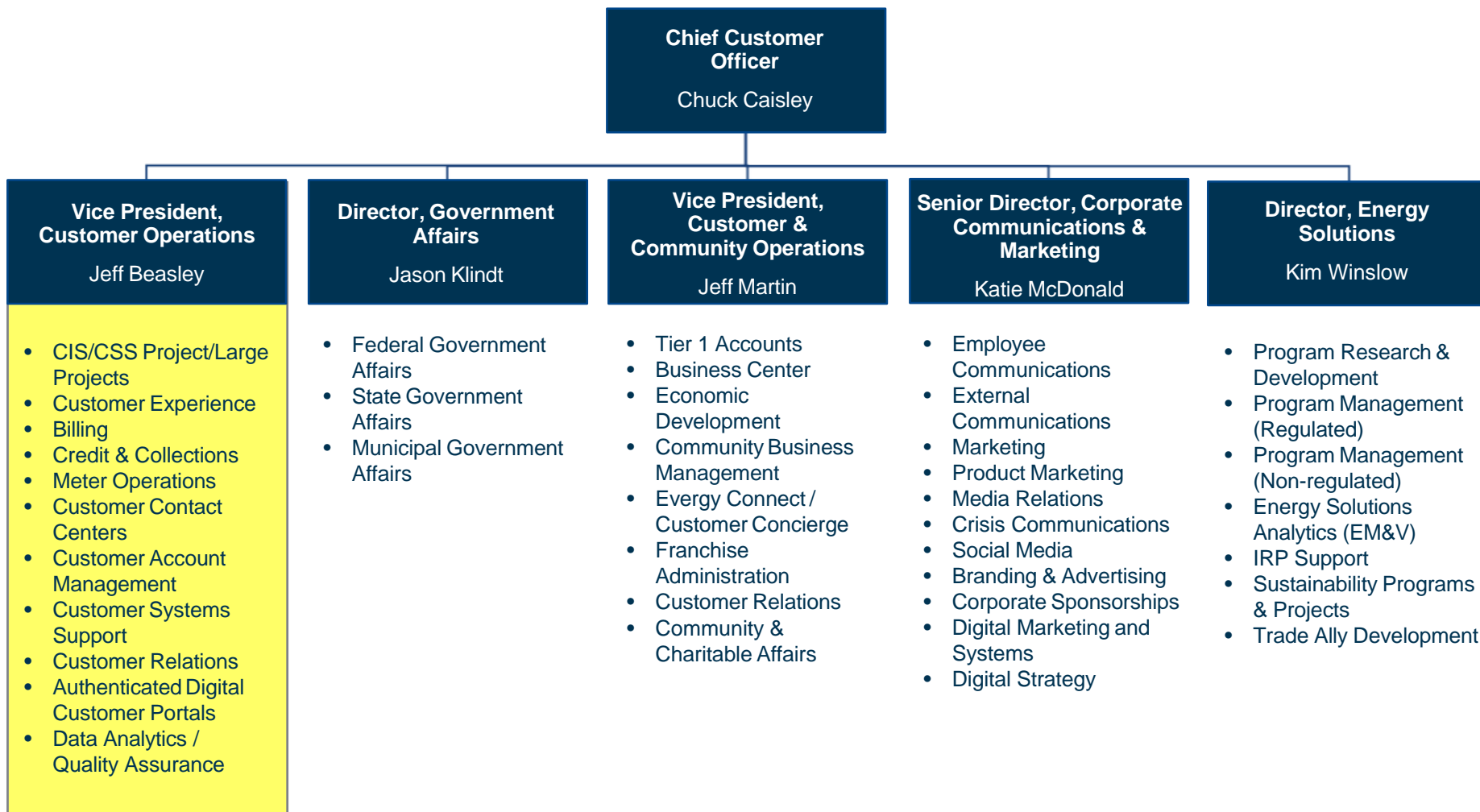
Major Merger Commitments Update – Cont.

- Merger Integration: Conducted four update meetings with Staff & OPC
 - Submitted three quarterly staffing and contingent labor reports
 - Submitted three board presentations related to merger
- Submitted monthly customer service and operational level reports to Staff
- Submitted customer survey results
- Met with Staff to review contact center and other service quality performance
- Met with Staff, OPC, and Community Action Agencies to discuss progress to date for assisting the low-income population
- Completing reorganization of functions in Operations and Customer & Community Operations
 - Previously Customer Operations was within Operations; Now within Customer & Community Operations
 - Reorganized functions within Generation, Transmission and Distribution

Operations – Post April 2019 Reorganization



Customer & Community Operations – Post April 2019 Reorganization

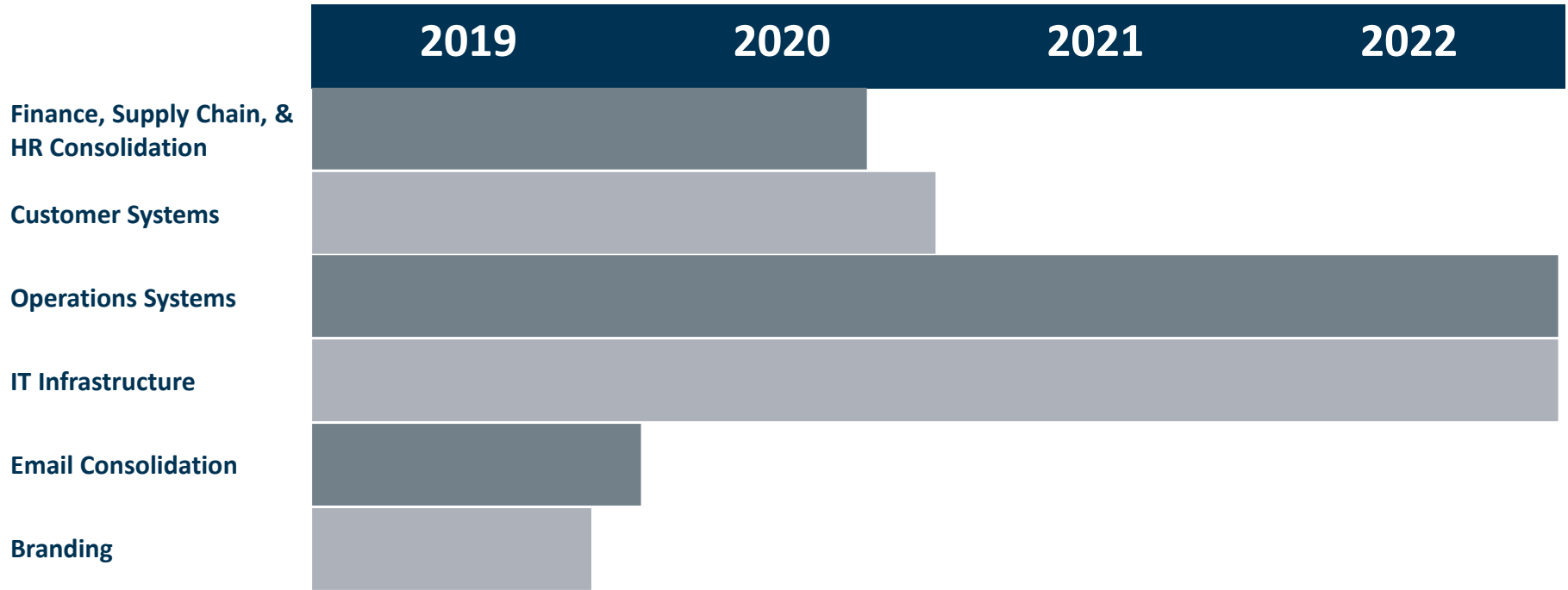


IT Integration Update

IT Integration Update

- Executing IT Roadmap developed during Integration Planning
 - Leveraging complementary technology decisions made by legacy companies
 - For Example: Distribution Enterprise Asset Management – Westar
Customer System – KCP&L
- Continued focus on cybersecurity and operational technology
 - Identity and Access Management project underway
 - Energy Management System upgrades
 - Network and IT infrastructure consolidation ongoing

IT Integration Update



Merger Efficiencies

Merger Efficiencies Summary

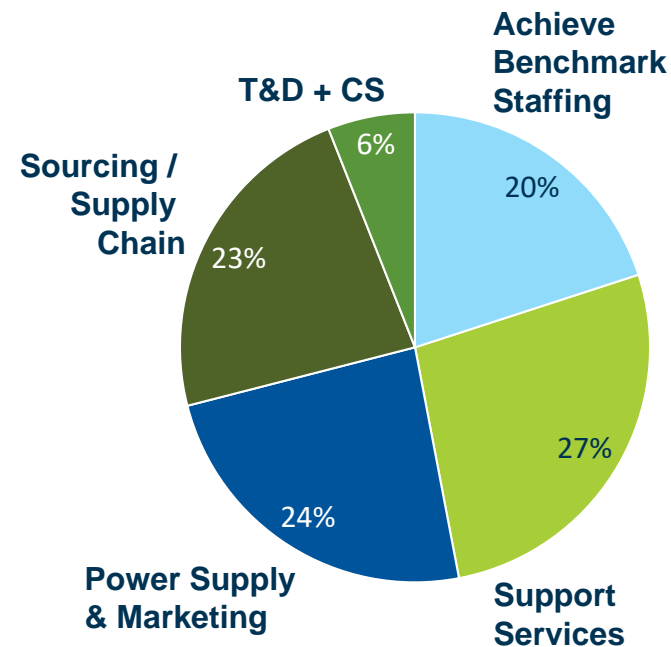
Savings Summary (\$M)

Gross Efficiencies
\$627.0

Savings Summary by type and year (\$M)

Efficiencies	2018	2019	2020	2021	2022	Total
NFOM	\$46.8	\$108.0	\$133.1	\$137.3	\$146.3	\$571.6
Fuel	\$0.7	\$1.0	\$1.1	\$1.3	\$2.3	\$6.4
Inventory Carrying Costs	\$2.2	\$7.9	\$12.3	\$13.3	\$13.4	\$49.0
Gross Efficiencies	\$49.7	\$116.9	\$146.5	\$151.9	\$162.0	\$627.0

Gross Efficiencies Summary by Source



Merger Savings Highlights

- Finished 2018 moderately ahead of planned gross savings
- Currently tracking ahead of 2019 planned gross savings
 - Addressing headwinds including fast ramp up of savings charters and January 2019 winter storm
- Savings highlights:
 - Over 50% of filed efficiency charters producing savings
 - Administering voluntary employee exit programs consistent with plans
 - Completed Wave 1 and Wave 2 sourcing with better than plan results
 - Annual insurance procurements yielding favorable results
 - Aligned rural vegetation management practices
 - Reducing redundant support services contracts in line with plan
 - Added charters for Wolf Creek Support Centralization and VEP
 - Chartered additional efficiencies in IT, Compliance, Fleet, F&A, Customer and Community Affairs, Generation, and Legal

Branding Update





WHAT IT MEANS

OUR NAME is the combination of ever + energy, conveying our proud history as a reliable, enduring source of energy for our community, and our vision to continue being so far into the future. When it comes to energy, we are ever evolving, ever innovating, and ever looking ahead.

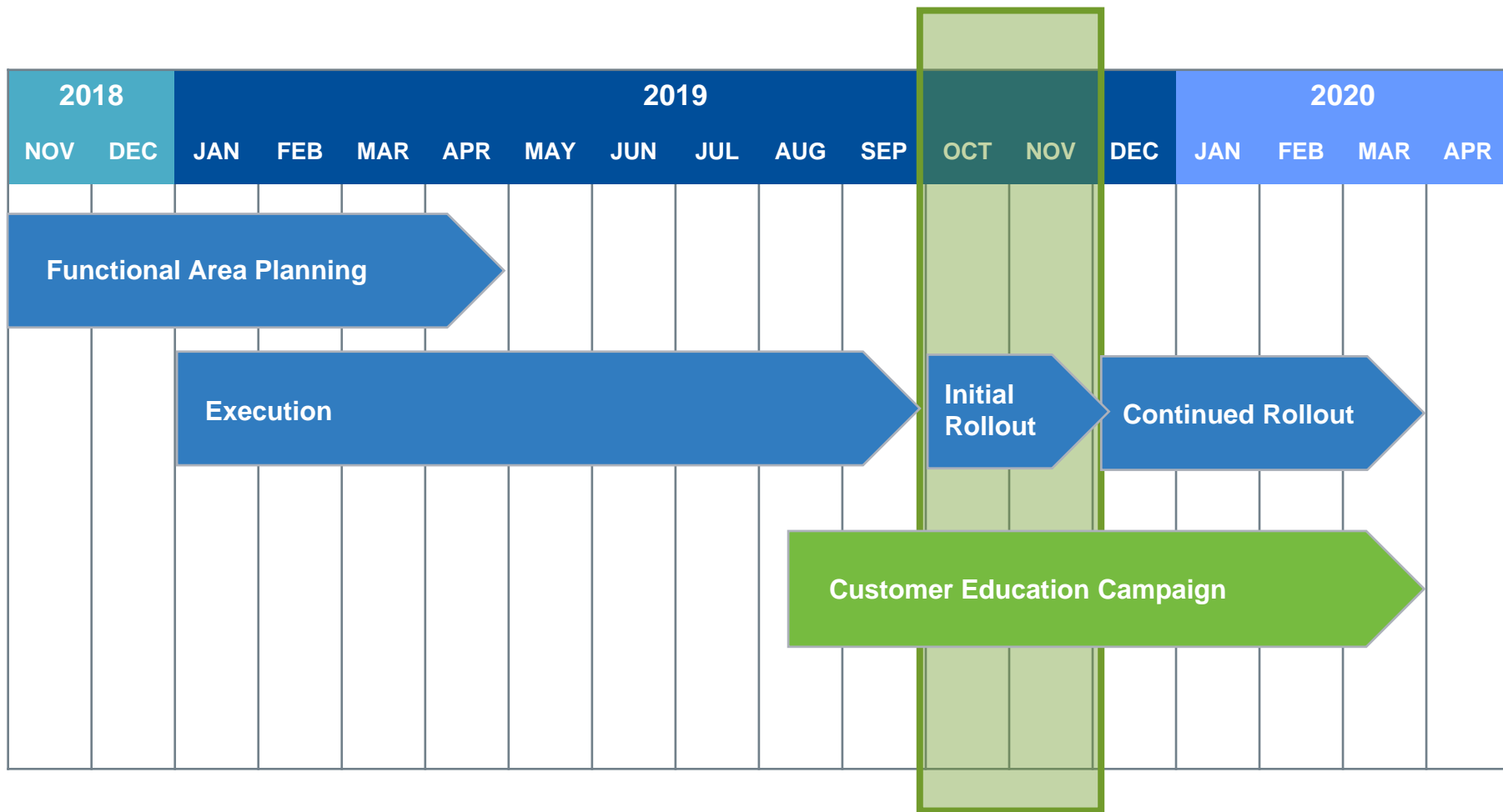
OUR LOGO is led by a dynamic arrow-like shape that visualizes our forward momentum. The soft edges and lowercase letters reflect our genuine, friendly and open nature.

OUR ICON consists of four shapes coming together to form an arrow, each representing one of our four core values: safety, integrity, ownership and adaptability. The shapes also represent the coming together of many pieces, both those that made our two companies into Evergy today, and those that could become part of Evergy in the future. Together, we are moving energy and our communities forward.

Evergy. Moving Energy Forward.

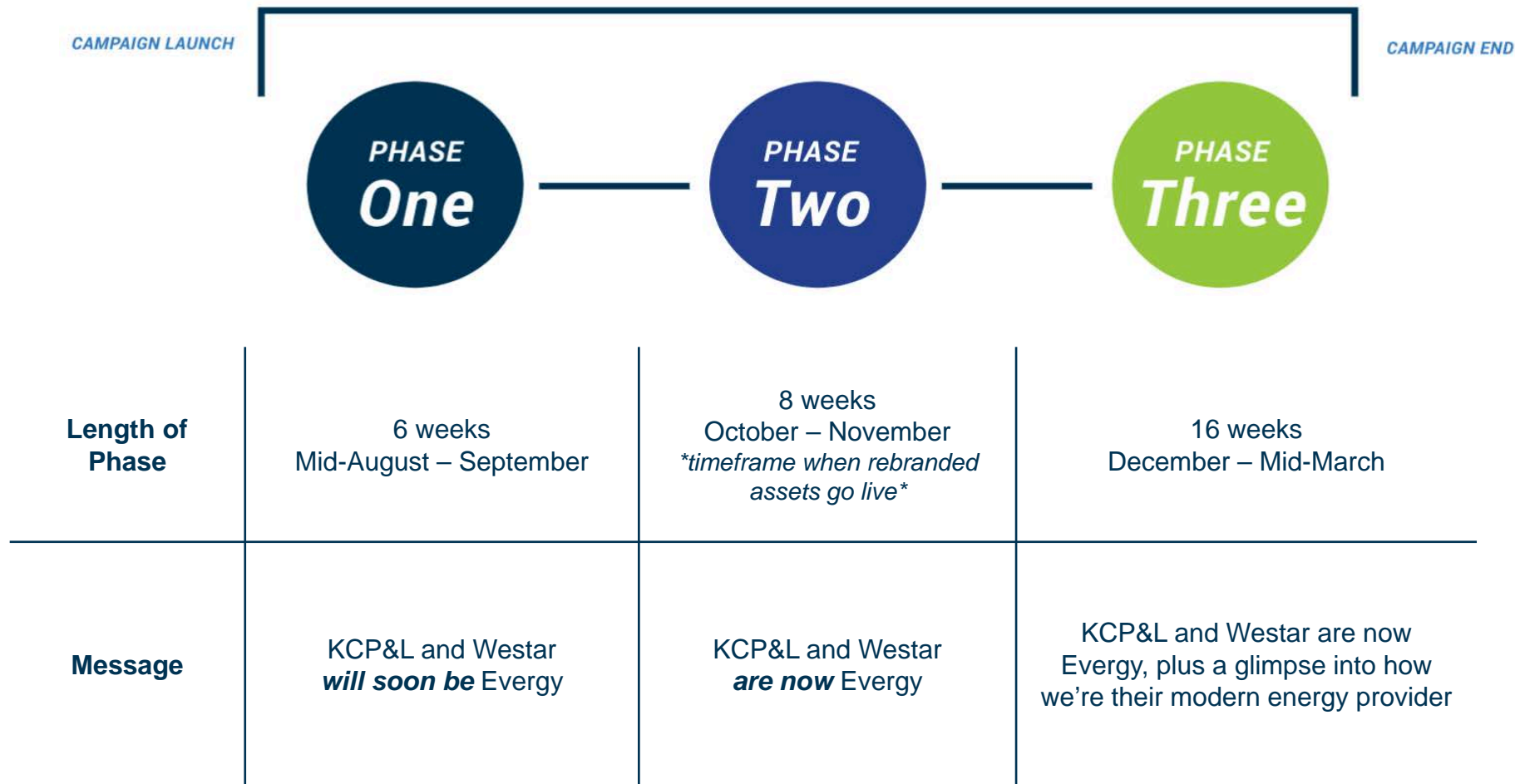
Evergy Rebranding Project Timeline

Oct-Nov 2019: Launch & Initial Rollout Window

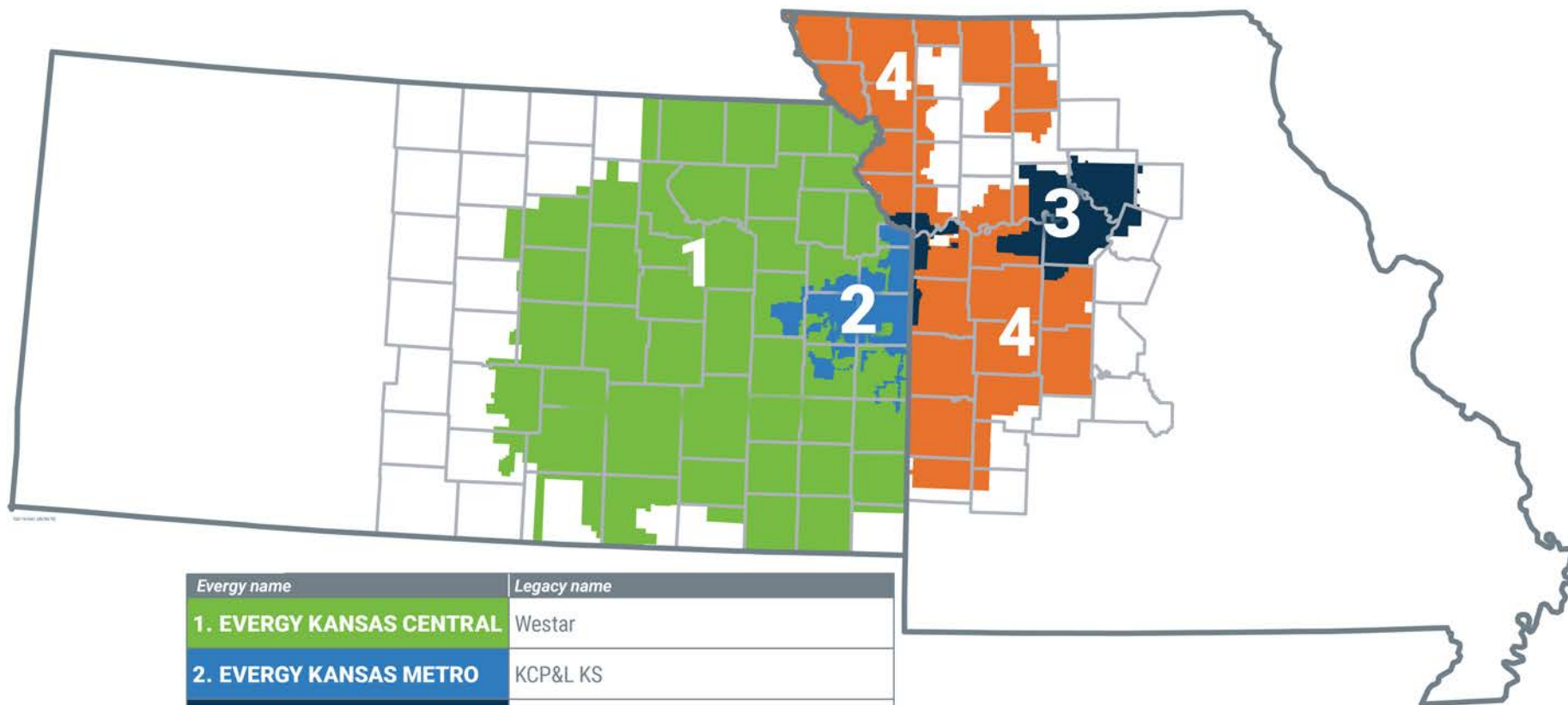


***In accordance with our merger agreement, rebranding costs are paid by shareholders**

Customer Education Campaign Timeline



Rate Area Identification



Evergy name	Legacy name
1. EVERGY KANSAS CENTRAL	Westar
2. EVERGY KANSAS METRO	KCP&L KS
3. EVERGY MISSOURI METRO	KCP&L MO
4. EVERGY MISSOURI WEST	KCP&L Greater Missouri Operations (GMO)



Customers will be able to easily identify their rate area in several ways

In the vast majority of communications, we will refer to ourselves simply as Evergy. Rate areas will be referenced when they are needed for a customer to understand how rates and tariffs apply to them.

Each customer will be able to know their specific rate area by:


- Looking at their bill
- Viewing our website, especially when they are logged into their account
- Calling or emailing the Contact Center, if needed

Additionally, rate areas will be communicated through:

- Press releases and announcements pertaining to rate areas
- Our website – public pages explaining the various rate areas

Appendix

Evergy Missouri West Bill Mock Up



For billing and service information: 816-471-5275
or toll-free: 1-888-471-5275
For emergencies or lights out: 1-888-544-4852

Customer Name: xxxxxxxxxx
Account Number: xxxxxxxxxx

Page 1 of 2
Billing Date: 04/01/2019

MESSAGE BOARD

KCP&L is now Evergy.

You live in Evergy Missouri West service area. Rate and available programs can vary based on your service area. For more information visit www.evergy.com/ServiceArea.

Effective Sept. 1, the factor for the Fuel Adjustment Clause (FAC) charge on your bill will change. For more info, visit www.evergy.com/my-account.

Upcoming Energy Cost Adjustment (ECA) factors per kWh: January - \$0.02143. For details visit evergy.com/understandmybill.

ACCOUNT SUMMARY

Previously Billed	\$83.66
Utility	\$83.66
Payment Received 04/03/2019 - Thank you	-\$84.12
Current Charges (Details on back)	\$73.40
Utility	\$73.40
Due Upon Receipt	\$72.93
Please pay by May 01, 2019 Pay \$73.29 after May 01, 2019	\$72.93


Please return this portion with your payment. Thank you.

Customer Name: xxxxxxxxxx
Account Number: xxxxxxxxxx
Billing Date: xxxxxxxxxx

Please pay by 05/01/2019: \$72.93
Amount due after 05/01/2019: \$73.29

Amount Enclosed: \$ _____

CHECK HERE
to indicate address or phone
changes on back of stub



EVERGY
PO BOX 219703
KANSAS CITY, MO 64121-9703

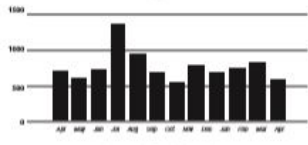
Customer Name: xxxxxxxxxx
Account Number: xxxxxxxxxx

Page 2 of 2
Billing Date: 04/01/2019

1234 MAIN KANSAS CITY, MO

Historical General - kWh

Energy Use



Comparative Usage Information

Period	kWh	Days	kWh/day	Avg Temp
Current	948	28	33.9	59°
Previous	765	30	25.5	59°
Last Year	776	31	25.0	62°

Billing Details service from 03/11/2019 to 04/08/2019

Customer Chg	\$11.47
Energy Chg 548.8614 kWh at \$0.0989 per kWh	\$54.27
OSRM Chg 03-12-2019-04-09-2019 for 548.8614 kWh at \$0.0010 per kWh	\$0.10
FAC Chg 03-12-2019-04-09-2019 for 548.8614 kWh at \$0.0082 per kWh	\$2.70
RESRAM Chg 03-12-2019-04-09-2019 for 548.8614 kWh at \$0.0083 per kWh	\$0.46
OSRM001	\$09.00
Kansas City Franchise Fee	\$4.40
Current Charges	\$73.40

Meter	Start Read Date	End Read Date	Days	End Read	Start Read	Read Difference	Rate	Meter Multiplier	kWh Used
123416081043	03/11	04/10	30	26,014.7986	25,105.9082	908.8914	1.0000	548.8614	

CONTACT INFORMATION CHANGE FORM

Your current telephone listing on file simplifies outage and emergency reporting. Account Number: xxxxxxxxxx

Change to: () _____ - _____

Mailing Address changes only. For service address changes call 816-471-5275 or toll-free 1-888-471-5275.

Mailing Address Line 1: _____


Mailing Address Line 2: _____

City: _____ State: _____ ZIP: _____

E-mail Address (optional): _____

Please print changes in blue or black ink and don't forget to mark the box on the front.

Evergy Missouri Metro Bill Mock Up



For billing and service information: 816-471-5275
or toll-free: 1-888-471-5275
For emergencies or lights out: 1-888-544-4852

Customer Name: xxxxxxxxxx
Account Number: xxxxxxxxxx

Page 1 of 2
Billing Date 03/18/2019

MESSAGE BOARD

KCP&L is now Evergy.

You live in Evergy **Missouri Metro** service area. Rate and available programs can vary based on your service area. For more information visit www.evergy.com/ServiceArea.

Effective Sept. 1, the factor for the Fuel Adjustment Clause (FAC) charge on your bill will change. For more info, visit www.evergy.com/my-account.

ACCOUNT SUMMARY

For service from 02/13/2019 to 03/17/2019

Previously Billed	\$60.84
Utility	\$60.84
Payment Received 03/07/2019 - Thank you	-\$60.84
Current Charges (details on back)	\$75.27
Utility	\$75.27
Due Upon Receipt	\$75.27

DO NOT PAY
\$75.27 will be charged to your card on 04/08/2019


Please return this portion with your payment. Thank you.

Customer Name: xxxxxxxxxx
Account Number: xxxxxxxxxx
Billing Date: xxxxxxxxxx

DO NOT PAY
\$75.27 will be charged to your card on 04/08/2019

Amount Enclosed: \$ _____

CHECK HERE
to indicate address or phone changes on back of stub



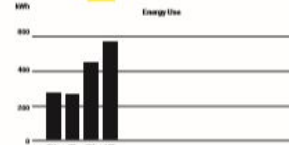
EVERGY
PO BOX 219703
KANSAS CITY, MO 64121-9703

Customer Name: xxxxxxxxxx
Account Number: xxxxxxxxxx

Page 2 of 2
Billing Date continues

1234 MAIN KANSAS CITY MO

Residential General **XMT1**



Comparative Usage Information

Period	kWh	Days	kWh / day	Avg Temp
Current	377	30	12.6	39°
Previous	406	27	15.1	37°

Billing Details service from 02/13/2019 to 03/17/2019

Customer Chg	\$11.47
Energy Chg 576.9540 kWh at \$0.09703 per kWh	\$65.98
DSM Chg 02-14-2013-03-17-2019 for 576.9540 kWh at \$0.00017 per kWh	\$0.10
FAC Chg 02-14-2019-03-17-2019 for 576.9540 kWh at \$0.00566 per kWh	\$3.20
Subtotal	\$70.75
Kansas City Franchise Fee	\$4.52
Current Charges	\$75.27

Meter	Start Read Date	End Read Date	Days	End Read LI	Start Read LI	Read Difference	Meter	Meter	kWh Used
108482130804	02/14	02/14	32	0,891.9762	2,513.9212	1,621.9450	1.0000	1.0000	176.9450

CONTACT INFORMATION CHANGE FORM

Your current telephone listing on file simplifies outage and emergency reporting. Account Number: xxxxxxxxxx

Change for: () _____

Mailing Address changes only. For service address changes call 816-471-5275 or toll-free 1-888-471-5275.

Mailing Address Line 1: _____

Mailing Address Line 2: _____

City: _____ State: _____ ZIP: _____

E-mail Address (optional): _____

Please print changes in blue or black ink and don't forget to mark the box on the front.

Sample Envelope Mock Ups

