

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc.)
d/b/a Evergy Missouri Metro's Request for)
Authority to Implement a General Rate) Case No. ER-2022-0129
Increase for Electric Service)

In the Matter of Evergy Missouri West, Inc.)
d/b/a Evergy Missouri West's Request for)
Authority to Implement a General Rate) Case No. ER-2022-0130
Increase for Electric Service)

**STATEMENT OF POSITION OF
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

COMES NOW the Missouri Industrial Energy Consumers ("MIEC") by and through
counsel, and files its Statement of Position as follows:

XVIII. Rate Design/Class Cost of Service

**A. What is the appropriate allocation of revenue requirement among the rate
classes of each company?**

Class cost of service is the starting point and the most important guideline for
establishing the level of rates charged to customers.

The Average and Excess Four Coincident Peak class cost of service study presented
by Metro for allocation of generation and transmission fixed costs is reasonable and
follows generally accepted industry standards.

Current rates for all classes are so far from cost of service that equity demands a
significant movement toward cost. The cost-of-service movement required for each

customer class is shown on Schedule MEB-COS-1 as expanded on Schedule MEB-COS-2. In no event should the movement toward cost of service be less than the results under Metro's proposed allocation of its proposed revenue increase.

Metro's allocation is acceptable if it receives the same level of revenue it proposed. If Metro does not receive as much of the increase as requested, the increased proposed for the Residential class and the Clean Charge Network (CCN) should be maintained at the level proposed by Metro, and the difference between the awarded revenue increase and the increase proposed by Metro should be distributed proportionately to the Non-Residential customer classes as an equal percentage decrease from the proposed revenue level.

B. What are the appropriate rate schedules, rate structures, and rate designs for the non-residential customers of each company?

Metro's proposal for the design of the LGS and LPS rate is acceptable. If this case results in less revenue from the LGS and LPS rates, then the proposed energy charges should be reduced by uniform amount per kWh to achieve the adjusted revenue target. In the unlikely event that this case results in a revenue level from the LGS and LPS classes that is higher than Metro's proposal, the Commission should increase the proposed demand and customer charges by the same percentage to collect the additional revenue, leaving the energy charges at their proposed level.

C. What are the appropriate rate schedules, rate structures, and rate designs for the Residential customers of each utility?

The rates to the Residential and Clean Charge Network (CCN) should be set at the level proposed by Metro. To the extent that additional revenue is required to reach the awarded revenue level, it should be recovered by a uniform percentage increase over present rates of the remaining customer classes. If a decrease is required, it should be apportioned as an equal percent reduction to the remaining customers classes.

Respectfully submitted,

Curtis, Heinz, Garrett & O'Keefe, P.C.

By: /s/ Diana M. Plescia

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been served on all parties.

/s/ Diana M. Plescia