

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

In the Matter of the Petition of Evergy Missouri)
West, Inc., d/b/a Evergy Missouri West for a)
Financing Order Authorizing the Financing of) Case No. EF-2022-0155
Qualified Extraordinary Storm Costs Through an)
Issuance of Securitized Utility Tariff Bonds)

LIST OF ISSUES AND PROPOSED HEARING SCHEDULE

Evergy Missouri West, Inc., d/b/a Evergy Missouri West (“EMW” or “Company”) submits this list of issues and proposed hearing schedule on behalf of all parties. In preparing this list of issues, the parties attempted to list all the contested issues, and attempted to obtain consensus on the descriptions of the issues. To the extent errors in issues or listed witnesses are discovered, the Commission will be advised as soon as possible. Not all parties agree that the issues listed below are issues to be decided in this case. However, to avoid the need to file multiple lists of issues, the parties have agreed to include all issues in this list whether agreed to or not.

PARTIES

EMW
Staff of the Commission (“Staff”)
Office of the Public Counsel (“OPC”)
Midwest Energy Consumers Group (“MECG”)
Missouri Industrial Energy Consumers (“MIEC”)
Nucor Steel Sedalia, LLC (“Nucor” or “Nucor Steel Sedalia”)
Velvet Tech Services, LLC (“Velvet” or “Velvet Tech Services”)

LIST OF ISSUES

1. What amount of qualified extraordinary costs caused by Winter Storm Uri should the Commission authorize EMW to finance using securitized utility tariff bonds?

OPC Alternative Version: What amount of costs related to Winter Storm Uri should the Commission authorize EMW to finance as qualified extraordinary costs using securitized utility tariff bonds?

- a. What amount of the costs, if any, that EMW is seeking to securitize would EMW recover through customary ratemaking?
- b. What is the appropriate method of customary ratemaking absent securitization?
- c. Under Section 393.1700.2(2)(e),¹ what is the “customary method of financing”? What are the costs that would result “from the application of the customary method of financing and reflecting the qualified extraordinary costs in retail customer rates”?
- d. What is the appropriate adjustment related to non-fuel operations and maintenance (“NFOM”) costs?
- e. Should EMW’s recovery through securitized bonds include more than 95% of fuel and purchased power costs?
- f. Should EMW’s recovery through securitized bonds reflect an offset based on certain higher than normal customer revenues received by EMW during Winter Storm Uri?
- g. Should EMW’s recovery through securitized bonds reflect a disallowance based on EMW’s resource planning?
- h. Were the costs incurred by EMW related to Winter Storm Uri as a result of its resource planning process just and reasonable?
 - (i) If no, should EMW’s recovery through securitized bonds reflect a disallowance?
 - (1) If yes, what amount should the Commission disallow?

¹ All statutory citations are to the Revised Statutes of Missouri (2016), as amended.

- i. Should EMW's recovery through securitized bonds reflect a disallowance for income tax deductions for Winter Storm Uri costs?
 - j. Should Evergy's recovery through securitized bonds reflect a disallowance for the income tax deduction on the carrying costs for Winter Storm Uri costs?
 - k. What are the appropriate carrying costs for Winter Storm Uri?
 - l. What is the appropriate adjustment to the amount of Winter Storm Uri costs to be recovered through securitized bonds, if any, regarding EMW's administration of the Special Incremental Load (SIL) tariff?
 - m. What is the appropriate discount rate or rates to use to calculate the net present value of Winter Storm Uri costs that would be recovered through customary ratemaking?
2. What are the estimated up-front and ongoing financing costs associated with securitizing qualified extraordinary costs associated with Winter Storm Uri?
- a. What is the appropriate return on investment and treatment of earnings in the capital subaccount?
 - b. Is the issuance of multiple series appropriate?
3. Would the issuance of securitized utility tariff bonds and imposition of securitized utility tariff charges provide quantifiable net present value benefits to customers as compared to recovery of the securitized utility tariff costs that would be incurred absent the issuance of bonds?
- a. What is the appropriate discount rate to use to calculate net present value of securitized utility tariff costs that would be recovered for Winter Storm Uri through securitization?

- b. What is the appropriate term and coupon rate for securitization of qualified extraordinary costs related to Winter Storm Uri?
4. How should the SUTC be allocated?
5. What, if any, additions or changes should be made to the Storm Securitized Utility Tariff Rider proposed by EMW?
6. Regarding any designated Staff representatives who may be advised by a financial advisor or advisors, what provisions or procedures should the Commission order to implement the requirements of Section 393.1700.2(3)?
7. What other conditions, if any, are appropriate and not inconsistent with Section 393.1700 that should be included in the financing order?
8. Should the Commission grant a waiver under Section 10(A)(1) of the Affiliate Transactions Rule between EMW and the special purpose entity?

ORDER OF OPENING STATEMENTS

EMW
Staff
MECG
MIEC
Nucor Steel Sedalia
Velvet Tech Services
OPC

ORDER OF CROSS-EXAMINATION

For EMW Witnesses: Velvet, Nucor, MECG, MIEC, Staff, and OPC.

For Staff Witnesses Bolin and Lange: Velvet, Nucor, MECG, MIEC, EMW, and OPC.

For Staff Witnesses Fortson, Luebbert, and Davis: Velvet, Nucor, MECG, MIEC, OPC,
and EMW.

For OPC Witnesses: Velvet, Nucor, MECG, MIEC Staff, and EMW.

ORDER OF WITNESSES – HEARING SCHEDULE²

Monday Aug. 1	Tuesday Aug. 2	Wednesday Aug. 3	Thursday Aug. 4	Friday Aug. 5
Ronald Klote	Matt Gummig	Kayla Messamore (not available Aug. 1)	Brad Fortson (Staff)	David Murray (OPC)
Jason Humphrey	John Carlson	John Reed	Mark Davis (Staff)	John Riley (OPC)
Steffen Lunde	Brad Lutz	Darrin Ives	Kim Bolin (Staff)	John Robinett (OPC)
John Bridson (may need to be taken out of order)	Melissa Hardesty	J Luebbert (Staff) (not available Aug. 4 or 5; may need to take out of order)	Sarah Lange (Staff)	Geoff Marke (OPC)
	Larry Kennedy		Lena Mantle (OPC)	

² Unless indicated otherwise, witnesses are available earlier than the scheduled day if time allows.

WHEREFORE, EMW respectfully submits this List of Issues and Proposed Hearing Schedule on behalf of the parties.

/s/ Roger W. Steiner

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed or mailed, postage prepaid, to all counsel of record as reflected on the service list maintained by the Commission in its electric filing information system on this 25th day of July 2022.

/s/ Roger W. Steiner

Attorney for Evergy Missouri West