

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

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

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

**REPLY BRIEF OF
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

COMES NOW the Missouri Industrial Energy Consumers (“MIEC”) and for its Reply Brief states as follows:

The Staff maintains that the Company’s proposed optional Time of Use (TOU) rates should be rejected in favor of Staff’s proposal for a new mandatory default TOU rate applicable to residential, LGS and LPS customers.¹

Staff’s mandatory default TOU rate proposal is unsupported by customer impact data, and therefore could result in unjust and unreasonable rates. Moreover, Staff’s mandatory TOU rate reduces customer options to the detriment of all affected customer classes. Staff states that its goal is to introduce customers to the concept of a TOU rate but fails to incorporate a rate differential that would demonstrate the value of such a rate to any customer. Contrary to Staff’s goal, this proposal is likely to reduce customer acceptance of TOU rates by confusing and alienating customers.

Staff’s mandatory default TOU proposal diminishes choices for all customers but would be particularly unreasonable for the LGS and LPS classes represented by MECG and

¹ Staff’s Post-Hearing Brief at pp. 41-4

MIEC in this case. Large businesses are fully capable of deciding whether TOU rates will bring value and efficiency to their operations, and no policy interest would be served by applying Staff's proposal to these customers.

Respectfully submitted,

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

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**CERTIFICATE OF
SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed to all parties on the Commission's service list in these cases.

/s/ Diana M. Plescia