

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

In the Matter of Evergy Metro, Inc. d/b/a)	
Evergy Missouri Metro’s Request for)	File No. ER-2022-0129
Authority to Implement a General Rate)	Tracking Nos. YE-2022-0200;
Increase for Electric Service)	YE-2022-0201

In the Matter of Evergy Missouri West, Inc.)	
d/b/a Evergy Missouri West’s Request for)	File No. ER-2022-0130
Authority to Implement a General Rate)	Tracking Nos. YE-2022-0202
Increase for Electric Service)	

**MECG OBJECTION TO EXPEDITED
TREATMENT OF COMPLIANCE TARIFFS**

COMES NOW the Midwest Energy Consumers Group (MECG), and for its objection to Expedited Treatment of Compliance Tariffs, states:

1. The Commission’s Order in this case addressed the disputes related to rate design for commercial and industrial customers by stating:

Given the unique make-up of non-residential customers, including small business, such as gas stations and restaurant, whose power consumption is customer driven, the Commission does not find Staff’s proposed default TOU rate for non-residential customers appropriate without further study. **The Commission agrees with Evergy’s proposal.** Evergy proposed a new Time-Related Pricing rate, seasonal alignment matching EMM to EMW, code consolidation and elimination of select end use rates. The Commission is persuaded that the expansion of rate offerings while simplifying the codes and end use rates will improve customer satisfaction, efficiency and will result in just and reasonable rates to non-residential customers.¹

¹ Report and Order, p. 70 (emphasis added).

MECG understood that provision to mean that the Commission was approving the method of allocation of any increase to the rate components for Commercial and Industrial customers that was proposed by Evergy and supported by MECG.

2. Evergy's initial brief asserted that the Commission should "approve the rate schedules, rate structures and rate designs proposed by Evergy for non-residential class. See Ex. 58 at 45-47 (Miller Direct); Ex. 118 at 34-39 (Miller Direct), and EMM and EMW's proposed tariffs.)"²

3. Within that testimony cited, Evergy witness Miller testified:

"Generally, for the C&I classes, the Company attempted narrow the gap between how costs are incurred and how rates are designed and applied 125% of each class increase to the fixed cost rate components (i.e. customer charges and demand charges) and 75% to the variable cost rate components (i.e. energy charges)."³

4. In its testimony, MECG supported the company's proposal to allocate 125% of any increase to demand components and 75% to energy components as corrected in the testimony of Kavita Maini.⁴

5. On Friday, December 2nd, the company filed its compliance tariffs and asked for expedited approval for those rates to be effective on Tuesday, December 6th. MECG is still undertaking its review of the sheets filed.

6. At this time, MECG believes that the rates for Commercial and Industrial customers in the compliance tariffs do not correctly apply 125% of any increase to fixed costs components and 75% to variable cost components. Because of this, the tariffs need to be substituted with corrections which will take some time to complete.

² Evergy Initial Brief, p. 61.

³ Ex. 58 at pp. 43-44 (Miller Direct).

⁴ See Maini Direct p. 34.

7. For these reasons, MECG objects to the expedited treatment of compliance tariffs so that parties have an opportunity to submit corrected tariff sheets and rates before the changes become effective.

WHEREFORE, MECG submits its Objection to Expedited Treatment of Compliance Tariffs.

Respectfully,

/s/ Tim Opitz

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 5th day of December 2022:

/s/ Tim Opitz
