

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

In the Matter of the Application of)	
KCP&L Greater Missouri Operations Company)	
For Approval of a Special Rate for a Facility)	File No. EO-2019-0244
Whose Primary Industry is the Production or)	
Fabrication of Steel in or Around Sedalia, Missouri.)	

**WITHDRAWAL OF MOTION TO REJECT TARIFF AND, INSTEAD,
MOTION TO MODIFY TARIFF**

COMES NOW, the Midwest Energy Consumers Group, and withdraws its motion to reject Evergy’s Schedule SIL tariff:

1. On December 9, 2019, MECG filed its Motion requesting that the Commission reject Evergy’s proposed Schedule SIL. MECG suggested that the proposed tariff would allow Evergy to set rates for any future customers to be served under that schedule.

2. On December 12, 2019, Evergy filed its response indicating that, under the proposed tariff, Evergy would be required to seek Commission approval of any such rate at least 60 days prior to offering that rate to a future customer. Given this, MECG withdraws its motion to reject the Evergy tariff.

3. That said, however, the 60 day period for the Commission to approve such a rate in the future is not adequate. In this case, Evergy filed its Application to serve Nucor on July 12, 2019. Ultimately, after several extensions in the procedural schedule, the Commission issued its order approving the proposed rate on November 13, 2019. Thus, this case took approximately 4 months instead of the 2 months now contemplated by Evergy’s proposed Schedule SIL. Frankly, 60 days is not adequate to provide for discovery, pre-filed testimony and any evidentiary hearing. As such, the Commission should modify Evergy’s proposed Schedule SIL to provide for 120 days for the Commission to act. In the event that a shorter time is necessary, then Evergy could seek expedited treatment from the Commission.

WHEREFORE, MECG respectfully requests that the Commission modify Evergy's proposed Schedule SIL.

Respectfully submitted,

 /s/ David Woodsmall
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**ATTORNEY FOR THE MIDWEST
ENERGY CONSUMERS GROUP**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.

 /s/ David Woodsmall
David L. Woodsmall

Dated: December 16, 2019