



3. Consequently, the OPC files this motion identifying the amount “not in question” to be included in interim adjusted FARs pursuant to 20 CSR 4240-20.090(8)(H)3.

4. The total fuel and purchased power adjustment (“FPA”) subject to recovery in this case (after jurisdictional allocation, application of the 95/5 FAC sharing mechanism, true-up, interest, and prior prudence adjustments) is \$104,175,279. *Public Counsel's Response to Filed Tariffs and Staff Recommendation and Memorandum*, exhibit 1 (*Memorandum*) pg. 3, ER-2023-0210, EFIS Item No. 7.

5. In its *Response*, the OPC questioned \$85,420,087 of this amount, but did not question the ability of Evergy West to collect \$18,755,192 of this amount through its FAC. *Public Counsel's Response to Filed Tariffs and Staff Recommendation and Memorandum*, pg. 8 ¶¶ 33 – 35, ER-2023-0210, EFIS Item No. 7.

6. No other party to this case has filed or otherwise sought to question any amount more than the amount called into question by the OPC, and the OPC questions the inclusion in interim rates of any amount greater than the \$18,755,192 identified in its *Response*.

7. Therefore, the only “part of the proposed adjustment that is not in question” as described in 20 CSR 4240-20.090(8)(H)3 is the \$18,755,192 identified in the OPC’s *Response*.

8. Thus, as stated in its initial *Response*, “[t]he Commission should . . . order Evergy West to file a substitute rate schedule with an FPA of \$18,755,192” as this is the amount that is “not in question” pursuant to 20 CSR 4240-20.090(8)(H)3.

WHEREFORE, the Office of the Public Counsel respectfully requests the Commission find that the FPA amount “not in question” in this case is \$18,755,192 and order Evergy West to file tariff sheet(s) to implement interim adjusted FARs to reflect this amount pursuant to 20 CSR 4240-20.090(8)(H)3.

Respectfully submitted,

By:           /s/ John Clizer            
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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this seventeenth day of March, 2023.

          /s/ John Clizer