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 Authority to Implement A General Rate Increase for Electric Service))))	Case No. ER-2022-0129
n the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Request for Authority to Implement A General Rate Increase for Electric Service))))	Case No. ER-2022-0130

OPC STATEMENT OF DISCOVERY DISPUTE/CONCERN

COMES NOW the Office of the Public Counsel ("OPC") and for its *Statement* of *Discovery Dispute/Concern*, states as follows:

1. The OPC has a discovery dispute and/or concern with Evergy Metro, Inc. and Evergy Missouri West, Inc. (collectively "Evergy"), in that, Evergy is declining to provide physical copies of documentation as sought by OPC data request numbers 3018 and 3019.

2. Evergy has offered to allow the OPC to view the documents, which the OPC has already done, but the OPC now needs physical copies of the same to attach as schedules to support pre-filed testimony.

3. The OPC has a second discovery dispute and/or concern with Evergy in that Evergy has declined to provide certain materials related to the meetings of its Board of Directors on the basis of a claimed attorney-client privilege and/or application of the work product doctrine.

4. The OPC disputes the applicability of either doctrine with regard to two specific items requested and seeks discovery of the specific material.

WHEREFORE, the Office of the Public Counsel respectfully submits this Statement of Discovery Dispute/Concern in advance of the Discover Conference currently scheduled for May 5, 2022..

Respectfully submitted,

By: /s/ John Clizer John Clizer (#69043) Senior Counsel Missouri Office of the Public Counsel P.O. Box 2230 Jefferson City, MO 65102 Telephone: (573) 751-5324 Facsimile: (573) 751-5562 E-mail: john.clizer@opc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this second day of May, 2022.

/s/ John Clizer