

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)

**INITIAL POST-HEARING BRIEF OF
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

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

In this case, MIEC addressed the issues of class revenue allocation and rate design. The Commission has issued an order approving a stipulation resolving class revenue allocation, but several rate design issues remain for decision¹.

The MIEC recommends that the Commission adopt the Company’s proposed rate design and reduce the proposed energy charges by a uniform amount per kWh to achieve the revenues provided by the approved settlements in this case. The MIEC also recommends that the Commission reject the Staff’s proposal for a mandatory time of use (TOU) rate.

MIEC witness Maurice Brubaker provided testimony supporting approval of the Company’s proposed rate design for non-residential customers, which includes new TOU rates and updates to the Company’s current rate structures². Because the approved revenue

¹ Commission Order Approving Four Partial Stipulations and Agreements, September 22, 2022.

² Direct Testimony of Maurice Brubaker, p. 28 ll. 4-14.

increase is lower than proposed by the Company, the proposed energy charges should be reduced by a uniform amount per kWh to achieve the adjusted revenue target³.

The Commission should reject the Commission's Staff proposal for a non-residential mandatory default TOU rate design.⁴ The Commission Staff did not provide data or analysis to show the customer impacts of this proposal.⁵ To the extent the Commission decides that Staff's proposal should be further evaluated, this can be accomplished in collaborative proceedings which will take place between this case and the next rate case.⁶

³ Id. at p. 28, ll. 3-12.

⁴ Exh. 229, Direct Testimony of Sarah Lange at p. 60, ll. 12-23.

⁵ Exh. 601, Rebuttal Testimony of Maurice Brubaker at p. 9, l. 16 – p. 10, l. 10.

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