

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of Evergy)
Metro, Inc. d/b/a Evergy Missouri Metro and)
Evergy Missouri West, Inc. d/b/a Evergy) File No. EU-2020-0350
Missouri West for an Accounting Authority)
Order Allowing the Companies to Record and)
Preserve Costs Related to COVID-19 Expenses)

RESPONSE TO ORDER DIRECTING EXPEDITED FILING

COME NOW, the Midwest Energy Consumers Group (“MECG”) and for its Response to the Commission’s November 3, 2020 Order Directing Expedited Filing respectfully states as follows:

1. On September 9, 2020, the parties submitted their *List of Issues, List and Order of Witnesses, Order of Opening Statements, and Order of Cross Examination*. The *List of Issues* included the following subissue regarding materiality:

OPC / MECG / [Sierra Club] Issue: Is the resulting economic impact material within the scope of the Uniform System of Accounts?

2. Following a postponement of the procedural schedule to allow parties to engage in settlement discussions, the Commission issued its October 28, 2020 Order setting an evidentiary hearing.

3. On October 23, 2020, the undersigned counsel submitted, on behalf of the parties, a revised *List of Issues, List and Order of Witnesses, Order of Opening Statements, and Order of Cross-Examination*. That revised pleading was intended to change only the *Order of Witnesses, Order of Opening Statements and Order of Cross-Examination* portion of the original pleading. It was not intended to make any changes to the *List of Issues* portion of the original pleading.

4. In preparing that revised *List of Issues*, undersigned counsel sloppily worked from a draft version of the original *List of Issues* that did not include the materiality subissue. Worse

still, counsel carelessly informed the other parties and the RLJ that the *List of Issues* portion of the pleading was identical in all respects to the original *List of Issues*.

5. MECG apologizes for its careless drafting and suggests that the *List of Issues* portion of the pleading should mirror the original *List of Issues* including the materiality subissue.

WHEREFORE, MECG apologizes for its sloppy drafting and careless representation to the parties / judge and submits that the original *List of Issues*, including the materiality subissue, should be used in this proceeding.

Respectfully submitted,

/s/ David L. Woodsmall

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ATTORNEY FOR THE MIDWEST ENERGY
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Certificate of Service

I hereby certify that a true and correct copy of the foregoing was electronically served on this 3rd day of November, 2020, on the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ David L. Woodsmall