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

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 Missouri West for	)	File No. EA-2022-0043
Permission and Approval of a Certificate of Public	)	
Convenience and Necessity Authorizing It to	)	
Construct, Install, Own, Operate, Maintain, and	)	
Otherwise Control and Manage Solar Generation	)	
Facilities in Kansas City, Missouri		

## Renew Missouri's Request for Extension of Response Deadline

COMES NOW, Renew Missouri Advocates d/b/a Renew Missouri ("Renew Missouri"), pursuant to the Missouri Public Service Commission's (the "Commission") January 11, 2022, Order Directing Staff to File a Recommendation and Setting a Time for Responses issued in the above-captioned docket, Renew Missouri respectfully states:

### **Background**

- 1. On December 14, 2021 Evergy Missouri Metro and Evergy Missouri West (together "Evergy" or "the Company") filed an Application for a Certificate of Convenience and Necessity authorizing it to construct, install, own, operate, maintain and otherwise control and manage electrical solar production and related facilities in Kansas City, Missouri.
- 2. On January 7, 2022 Evergy filed tariff sheets and direct testimony to implement a general rate increase. (Case Nos. ER-2022-0129; ER-2022-0130).
- 3. On January 11, 2022 the Commission directed Staff to file a Recommendation for Evergy's CCN Application by March 10, 2022, and set a deadline of March 21, 2022 for all other responses to Staff's Recommendation and Evergy's CCN application. (January 11, 2022 Order 1, Doc. 9).

- 4. On March 10, 2022 Staff filed its Recommendation, which recommended the approval of Evergy's CCN Application subject to fifteen conditions. (Staff's Recommendation, Doc. 11).
- 5. On March 18<sup>th</sup>, Evergy requested an extension of time to respond to Staff's Recommendation (Doc. 13), which was granted by the Commission the same day. (Doc. 14). The Order extended Evergy's deadline to respond until April 7, 2022.
- 6. On March 21, 2022, the Office of Public Counsel ("OPC") filed a Motion for Extension or, in the Alternative, Request for Hearing. (Doc. 15). The same day, the Commission granted OPC's Motion for Extension and set the deadline for response as April 7, 2022.
- 7. Renew Missouri is working to engage with the parties to this case and to review the overlapping issues between Evergy's CCN Application and the rate case filing. Due to the complex and overlapping issues in these cases and the parties' stated needs to clarify Staff's conditions, Renew Missouri asks the Commission to grant a two-week extension of the response deadline so that Renew Missouri can submit its response. The extension would not prejudice any party to this matter, as all other parties have been granted an extension.

**WHEREFORE**, Renew Missouri respectfully requests that the Commission grant it a two week extension of the response deadline.

Respectfully submitted,

# /s/ Alissa Greenwald

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Attorney for Renew Missouri

# Certificate of Service

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 21st day of March 2022:

/s/ Alissa Greenwald