

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

In the Matter of the Second Prudence Review)
of the Missouri Energy Efficiency Investment)
Act (MEEIA) Cycle 2 Energy Efficiency) File No. EO-2020-0227
Programs of Evergy Metro, Inc. d/b/a Evergy)
Missouri Metro)

In the Matter of the Second Prudence Review)
of the Missouri Energy Efficiency Investment)
Act (MEEIA) Cycle 2 Energy Efficiency) File No. EO-2020-0228
Programs of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West)

**LIST OF ISSUES, ORDER OF WITNESSES, ORDER OF CROSS-
EXAMINATION, AND JOINT STIPULATION OF FACTS**

COMES NOW, Staff (“Staff”) of the Missouri Public Service Commission (“Commission”), Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”), and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) (collectively “Evergy”) and the Office of the Public Counsel (“OPC”)(collectively the “Parties”) pursuant to the Commission’s *Order Consolidating Cases and Setting Procedural Schedule* (“Order”) issued August 5, 2020 and files this *List of Issues, Order of Witnesses, Order of Cross-Examination and Joint Stipulation of Facts*.

LIST OF ISSUES¹

1. Are Staff’s and OPC’s proposed prudence adjustments within the scope of a MEEIA prudence review as defined by 20 CSR 4240-20.093?

¹ Not all parties agree that all the listed issues are actually issues to be decided in the case.

2. Did Evergy act imprudently in its implementation of the Residential Programmable Thermostat program? If the Commission finds Evergy acted imprudently, what adjustment should the Commission order?

3. Did Evergy act imprudently in its implementation of its Demand Response Incentive Program? If the Commission finds Evergy acted imprudently, what adjustment should the Commission order?

4. Did Evergy act imprudently by not calling more demand response events for the purpose of reducing Southwest Power Pool (SPP) fees? If the Commission finds Evergy acted imprudently, what adjustment should the Commission order?

5. Did Evergy act imprudently by not calling more demand response events for the purpose of reducing the costs associated with day-ahead locational marginal prices? If the Commission finds Evergy acted imprudently, what adjustment should the Commission order?

6. Did Evergy Missouri Metro act imprudently by not entering into more bi-lateral capacity contracts? If the Commission finds Evergy acted imprudently, what adjustment should the Commission order?

7. Did Evergy act imprudently by virtue of its MEEIA programs' incentive to non-incentive costs ratios?

ORDER OF WITNESSES

November 5-6, 2020 via Web Ex

1. John Carlson (Evergy)
2. Brian File (Evergy)
3. Brad Fortson (Staff)
4. Cynthia Tandy (Staff)

5. J Luebbert (Staff)
6. Geoff Marke (OPC)

ORDER OF CROSS-EXAMINATION

1. Staff Witness: OPC, Evergy
2. Evergy Witness: OPC, Staff
3. OPC Witness: Staff, Evergy

JOINT STIPULATED FACTS

The Parties hereto agree to the following list of stipulated facts:

1. Evergy is a regulated investor-owned electric corporation operating in the state of Missouri.
2. Evergy operates energy-efficiency and demand-response programs approved by the Missouri Public Service Commission.
3. Evergy's energy-efficiency and demand-response programs are subject to the Missouri Energy Efficiency and Investment Act (MEEIA).
4. Evergy's operations are within the footprint of the SPP.
5. On August 18, 2020 Staff filed its direct testimony in this case, which generally alleges Evergy acted imprudently by failing to call more demand response events.
6. On September 11, 2020 the Office of Public Counsel filed its rebuttal testimony alleging Evergy acted imprudently by virtue of incentive to non-incentive cost ratios of the MEEIA programs.

WHEREFORE, the Parties submit this *List of Issues, Order of Witnesses, Order of Cross-Examination and Joint Stipulation of Facts* pursuant to the Commission's Order.

Respectfully Submitted,

/s/ Roger W. Steiner

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**Attorney for the Office of the
Public Counsel**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 26th day of October 2020.

/s/ Roger W. Steiner

Roger W. Steiner