

**BEFORE THE MISSOURI 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) File No. EU-2020-0350
For an Accounting Authority Order Allowing the)
Companies to Record and Preserve Costs Related)
To COVID-19 Expenses)

RENEW MISSOURI’S STATEMENT OF POSITIONS

COMES NOW Renew Missouri Advocates (“Renew Missouri”) and submits its *Statement of Positions*.

ISSUES

1. *Is the Covid 19 pandemic an extraordinary event within the scope of the Uniform System of Accounts as it has been historically interpreted and applied by the Commission or as subsequently modified by Missouri courts?*

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

OPC/MECG/SC Issue:

- a. *Is the resulting economic impact material within the scope of the Uniform System of Accounts?*

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

2. *Should the Commission approve the Application for an accounting authority order (“AAO”) permitting Evergy to accumulate and defer to a regulatory asset for consideration of recovery in future rate case proceedings before the Missouri Public Service Commission (“Commission”) extraordinary costs and financial impacts incurred as a result of the coronavirus disease (“COVID-19”) pandemic?*

Renew Missouri Position:

The Commission should approve the Application for an AAO subject to certain conditions related to protections for customers affected by the COVID-19 pandemic outlined in the Rebuttal Testimony of NHT's witness Roger Colton.

3. *If the Commission determines that an AAO or other deferral accounting mechanism should be ordered in connection with the COVID-19 pandemic, what items should be deferred?*
 - a. *Uncollectible expense in excess of amounts included in rates in the most recent general rate cases of Evergy Missouri Metro and Evergy Missouri West, respectively?*
 - b. *Costs incurred in connection with the one- and four-month Pandemic payment plan incentives that the Commission permitted the Company to implement in Case No. EO-2020-0383 (including credits awarded as incentives and costs related to customer communications)?*
 - c. *Waived late payment fees / reconnection fees to the extent that they fall short of the amount included in rates?*
 - d. *Information technology-related costs incurred to enable employees to work from home, including hardware, licensing fees and connectivity costs?*
 - e. *Costs incurred to protect employees unable to work from home, including cleaning supplies, personal protective equipment, temperature testing, employee sequestration preparation (and employee sequestration if that becomes necessary)?*
 - f. *Lost revenues associated with the reduction of electric usage during the Pandemic? As an alternative, should the Commission order the deferral of pandemic-related lost fixed cost recovery due to the pandemic?*
 - g. *Other incremental costs or other unfavorable financial impacts resulting from the Pandemic not presently identified?*
 - h. *What pandemic-related savings should be booked as a regulatory liability or included as an offset to the regulatory asset related to the pandemic-financial impacts?*
 - i. *Should carrying costs be excluded during the deferral period and be considered for inclusion in rates in Evergy's next general rate case?*

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

4. *Should the Commission adopt a sunset provision in connection with the AAO and, if so, how should it be structured? Should any sunset provision include the opportunity for the AAO to be extended?*

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

5. *If the Commission adopts an AAO for some or all of the costs and revenues associated with the COVID-19, should the Commission order periodic reporting of information associated with the deferral? If so, what information should be reported and how often?*

Renew Missouri Position:

The Commission should order the collection and public reporting the metrics at pages 114-116 of Roger Colton's Rebuttal testimony.

6. *Should the Commission adopt the recommendations of NHT related to extension of the moratorium on nonpayment service disconnections, arrearage management programs, long-term payment deferment plans, expansion of the Economic Relief Program, income-eligible energy efficiency plans, suspend credit reporting, suspend disconnection and reconnection fees, or other customer programs?*

Renew Missouri Position:

The Commission should adopt, as conditions for an AAO, the extension of the moratorium on nonpayment service disconnections, adoption of an arrearage management program, adoption of long-term payment plans, expansion of the Economic Relief Program, income-eligible energy efficiency plans, suspend credit reporting, and suspend the disconnection and reconnection fees.

7. *Should the Commission adopt any of the customer-specific recommendations of OPC including: 1) waiving disconnection and reconnection fees; 2) ceasing full credit reporting; 3) waiving late payment fees and deposits; 4) expanding payment plans to 12 months or greater; and 5) establishing an arrearage matching program, dollar-for-dollar on bad debt for eligible customers.*

Renew Missouri Position:

The Commission should adopt, as conditions for an AAO, the recommendations of OPC with the exception of items 4 and 5. For those points, Renew Missouri is generally supportive, but recommends the Commission adopt the arrearage program and payment plan contained the Rebuttal testimony of Roger Colton.

8. *What, if any, other conditions should the Commission adopt in connection with the AAO?*

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

WHEREFORE, Renew Missouri submits its *Statement of Positions*.

Respectfully Submitted,

/s/ Tim Opitz

Tim Opitz, Mo. Bar No. 65082
409 Vandiver Drive, Building 5, Ste. 205
Columbia, MO 65202
T: (573) 825-1796
F: (573) 303-5633
tim@renewmo.org

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 16th day of September 2020:

/s/ Tim Opitz
