BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Joint Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for a Variance from the Commission's Billing And Payment Standards

File No. ET-2020-0133

STAFF REQUEST FOR EXTENSION OF TIME TO FILE RECOMMENDATION

COMES NOW Staff of the Missouri Public Service Commission and for its Request for Extension of Time to File Recommendation respectfully states as follows:

1. On November 12, 2019, Evergy Metro, Inc., d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc., d/b/a Evergy Missouri West (collectively the "Company") filed an Application for Variances and Motion for Expedited Treatment ("Application") requesting a variance from a portion of the Commission's billing and payment standards.

2. On the following day, November 13, 2019, the Commission issued an Order Directing Notice and Establishing Time for Responses, in which the Commission ordered Staff to file a recommendation in this matter no later than November 27, 2019.

3. Staff respectfully notifies the Commission that it will be unable to file a recommendation by November 27, 2019. Based on Staff's review of Company's responses to data request(s) submitted in this docket to date, Staff has concerns regarding apparent billing and usage discrepancies which will require additional discussions between Staff and Company, as well as the potential for more formal discovery, such as additional data requests. In addition, Staff's other workload at this time includes two electric corporation general rate cases as well as numerous other proceedings which limit the amount of time assigned Staff is able to dedicate to this case.

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4. Further complicating processing of this case is a pending Ameren Missouri case, Case No. EE-2019-0382, which contains an issue very similar to the issue in this case, and which has been set for hearing in late February 2020.

5. Company noted in its Application that it has already requested and received permission from the Commission to offer time of use ("TOU") rates in Docket No. ER-2018-0145 and Docket No. ER-2018-0146 respectively. Therefore, allowing Staff additional time to file a recommendation will not harm the Company.

6. Based on the foregoing, Staff respectfully requests until February 26, 2020 to file its recommendation in this case. If possible, and if unable to resolve this proceeding, Staff will file its recommendation sooner than February 26.

WHEREFORE, Staff respectfully requests the Commission issue an order granting Staff until February 26, 2020 to file a recommendation in this matter.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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Attorney for the Staff of the Missouri Public Service Commission

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 this 27th day of November, 2019.

<u>/s/ Jeffrey A. Keevil</u>