

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

In the Matter of Evergy Missouri West, Inc.            )  
d/b/a Evergy Missouri West’s Request for            )  
Authority to Implement a General Rate                )  
Increase for Electric Service                            )            **File No. ER-2022-0130**

**STATEMENT OF POSITION OF THE CITY OF ST. JOSEPH**

COMES NOW the City of St. Joseph, Missouri, by and through counsel, and files its Statement of Position as follows:

**XLIII: Streetlighting (West Only)**

**A. Should language be added to Evergy West’s Municipal Street Lighting Service Tariff providing that streetlights installed by a city contractor or a city-approved developer shall be deemed to be owned by Evergy, after inspection and approval by the Company, and shall not be subject to additional installation or structure charges?**

Yes. This practice, which served St. Joseph well for many years, should be restored so that the capital costs of such streetlights can be borne by the City contractor or City-approved developer rather than being shifted to operating costs of the City through its electric rates.

**B. Should language be added to Evergy West’s Municipal Street Lighting Service Tariff providing that no “Optional Equipment” charges in Section 4.0 or 5.0 of Municipal Street Lighting Service Tariff will be charged to streetlight facilities which are deemed to be owned by the Company and installed by a city or its contractor, or by a developer of a city-approved development?**

Yes. The cost of such “Optional Equipment” as breakaway bases and related undergrounding for those streetlights would be borne by the City contractor or City-

approved developer. Company should not be allowed to charge the City again for such costs through Sections 4.0 and 5.0 of its Streetlighting tariff.

**C. Should the Company be required to remove from its rate base streetlights that were installed by city contractors or city-approved developers?**

Yes. The capital cost of such streetlights has been borne by the contractor or developer, not by the Company or its investors. Such streetlights should be considered contributed capital and not part of Company's rate base, recovering depreciation expense and return on equity through its rates.

**D. Should the Company be required not to charge the City of St. Joseph for breakaway bases, undergrounding and other "Optional Equipment" charges under Sections 4.0 and 5.0 of the tariff for streetlights that were installed by city contractors or city-approved developers?**

Yes. Numerous such streetlights have become the property of Company since 1995. The cost of such "Optional Equipment" as breakaway bases and related undergrounding for those streetlights has been borne by the City contractor or City-approved developer. Company should not be allowed to charge the City again for such costs through Sections 4.0 and 5.0 of its Streetlighting tariff.

**Other Issues:**

St. Joseph takes no position at this time on the other issues in this case but reserves the right to do so as additional evidence is presented to the Commission. Further, St. Joseph reserves the right to cross-examine witnesses on, and to brief, any issue.

Respectfully submitted,

***/s/ William D. Steinmeier***

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**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the PSC Staff Counsel's office (at [staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)), on the Office of the Public Counsel (at [opcservice@opc.mo.gov](mailto:opcservice@opc.mo.gov)) and on all parties of record on this 22<sup>nd</sup> day of August 2022.

***/s/ William D. Steinmeier***

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William D. Steinmeier