

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

In the Matter of the Propriety of the Rate)
Schedules for Steam Service of KCP&L)
Greater Missouri Operations Company)

File No. HR-2018-0231

WITHDRAWAL OF OBJECTION

COMES NOW Staff of the Missouri Public Service Commission and for this Withdrawal of Objection respectfully states as follows:

1. On October 3, 2019, KCP&L Greater Missouri Operations Company¹ (“GMO” or “Company”) filed what it denominated as a Stipulation and Agreement (“Stipulation”), along with the testimony of Linda J. Nunn in support of the Stipulation. Attached to Ms. Nunn’s testimony were, among other things, exemplar or sample tariff sheets designed to reflect implementation of the Stipulation and signed letters of agreement from each of GMO’s five steam customers. Therefore, even though the customers are not parties to this case and the only party to the case which actually signed the Stipulation was GMO², there is evidence that each steam customer supports approval of the Stipulation.

2. In response to GMO’s filing of the Stipulation, on October 10, 2019, Staff filed an Objection to Stipulation and Agreement (“Objection”) objecting to the Stipulation. In its Objection Staff stated that “Staff is not at this time recommending that the Stipulation be *either* accepted *or* rejected. Staff simply needs more time to review and analyze the

¹ KCP&L Greater Missouri Operations Company is now known as Evergy Missouri West, Inc. d/b/a Evergy Missouri West.

² Due to the unique facts and circumstances presented by this case, this pleading does not address the question raised in Staff’s Objection to Stipulation and Agreement as to whether a stipulation signed by only one party to a case constitutes a true stipulation under the Commission’s rule 20 CSR 4240-2.115 regarding stipulations and agreements.

Stipulation and data underlying the Stipulation” and “After adequate review is performed, Staff may not object to the stipulation, and may in fact support the Stipulation or withdraw this objection.”

3. After discussions between GMO and Staff regarding the Stipulation and the exemplar tariffs submitted by GMO, on November 12, 2019 GMO filed a Notice of Changes to Exemplar Tariffs, along with new exemplar tariff sheets to address matters raised by Staff.

4. On October 10, 2019, the Commission issued an Order Directing Filing (“Order”) in which it ordered Staff to file either a recommendation or status report with regard to the Stipulation no later than November 15, 2019. Based on GMO’s November 12th filing and a review of available cost of service support, Staff believes the Stipulation and the new (November 12th) exemplar tariff sheets are reasonable. Staff therefore hereby withdraws its Objection previously filed herein and recommends the Commission approve the Stipulation.

WHEREFORE, pursuant to the Commission’s Order issued October 10, 2019, Staff respectfully requests the Commission issue an order approving the Stipulation and ordering the filing of compliance tariff sheets reflecting the exemplar tariff sheets filed by GMO on November 12, 2019.

Respectfully submitted,

/s/ Jeffrey A. Keevil

Jeffrey A. Keevil

Missouri Bar No. 33825

P. O. Box 360

Jefferson City, MO 65102

(573) 526-4887 (Telephone)

(573) 751-9285 (Fax)

Email: jeff.keevil@psc.mo.gov

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 15th day of November, 2019.

/s/ Jeffrey A. Keevil