

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

In the Matter of the Application of Evergy)
Missouri West, Inc. d/b/a Evergy Missouri)
West for Authority to Encumber Assets) **File No. EF-2022-0103**

STAFF REQUEST FOR EXTENSION OF TIME TO FILE RECOMMENDATION

COMES NOW Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and for its Request for Extension of Time to File Recommendation (“Request”) respectfully states as follows:

1. On November 22, 2021, Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“EMW” or “Company”) submitted an application requesting authority to encumber assets. EMW also requested a Commission order no later than February 14, 2022.
2. On November 23, 2021, the Commission issued an *Order Directing Staff to File Recommendation* in which it directed Staff to file a recommendation no later than December 23, 2021.
3. On November 24, 2021, Staff submitted its initial set of 13 data requests to EMW via EFIS. According to EFIS, the Company took 20 days to respond (the maximum time to respond to data requests per Commission rule 20 CSR 4240-2.090) to 4 of Staff’s initial 13 data requests; 21 days to respond to 7 of the initial 13 data requests; 26 days to respond to 1 of the initial 13 data requests; and 27 days to respond to 1 of the initial 13 data requests. In other words, the Company’s responses to almost 70% of the initial 13 data requests were overdue – despite the Company requesting a Commission order by February 14, 2022.

4. After an initial review of the Company's responses received to date, Staff believes additional data requests will be needed, along with time to analyze those responses as well as the responses already received.

5. Although, according to its Application, EMW intends with Commission authorization to establish a new First Mortgage Indenture and Deed of Trust ("Mortgage Indenture") which will establish a first mortgage lien on all its existing and future assets subject to certain exemptions detailed in the Mortgage Indenture, EMW has not provided a copy of such Mortgage Indenture for review. With its Application EMW provided only a "Confidential Indicative Summary of the Mortgage Indenture . . . for illustrative purposes only."

6. Further adding to the difficulty of Staff's review of EMW's Application, although EMW is requesting authority to encumber assets, it is not requesting authority to actually issue any bonds, notes or other evidences of indebtedness.

7. Based on the need for further discovery and review of such discovery, the time it has taken so far to obtain responses to discovery, the unique nature of EMW's request, and the intervening holidays, Staff requests until January 27, 2022, to file its recommendation in this matter. Counsel for EMW has indicated that the Company does not oppose Staff's request for an extension to January 27, 2022. Staff believes this should still allow for a Commission order by February 14, 2022, assuming Staff's recommendation is favorable.

WHEREFORE, Staff respectfully requests the Commission issue an order granting Staff until January 27, 2022, to file its recommendation in this matter and making such further orders as the Commission deems just and reasonable.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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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 as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 21st day of December, 2021.

/s/ Jeffrey A. Keevil