

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

In the Matter of an Agreement Between) Case No. EO-2021-0032
Every, Inc., and Elliott Management, Inc.)

SECOND MOTION FOR EXTENSION OF TIME

COMES NOW the Staff of the Missouri Public Service Commission and for its *Second Motion for Extension of Time*, hereby states as follows:

1. On August 6, 2020, the Commission’s Staff filed a motion asking the Commission to open an investigation into the agreement between Every, Inc. and Elliott Management Corporation and related activities, including the Sustainability Transformation Plan announced on August 5, 2020.

2. On August 12, 2020, the Commission granted Staff’s motion, stating “The Commission’s Staff shall undertake an investigation of the agreement between Every, Inc. and Elliott Management Corporation and related activities, including the Sustainability Transformation Plan announced on August 5, 2020.”

3. The Commission further directed Staff to report its findings, stating “Staff shall file a final report regarding its investigation no later than November 13, 2020.”

4. On October 23, 2020, the Commission granted Staff’s *Motion for Extension of Time* and extended the due date to January 29, 2021.

5. Staff now moves the Commission to extend the due date for its report up to and including February 26, 2021. Every has held a couple of workshops to provide information on the STP, and is going to schedule another workshop for early February, covering customer experience topics, and Staff would like the opportunity to take this information into account in the Staff report. Additionally, Staff will be reviewing of at least

some of Evergy's "charter" documents supporting its planned O&M reduction categories. Staff has recently submitted DRs for this information. Since there are currently 230 separate charters, it will take Staff additional time to perform the review and to reflect its analysis of the proposed O&M reductions in the report.

WHEREFORE, Staff prays that the Commission will grant it an extension of time within which to file its report, up to and including February 26, 2021, and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

/s/ Kevin A. Thompson

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CERTIFICATE OF SERVICE

The undersigned certifies that he has served electronically a true and correct copy of the foregoing upon all parties of record pursuant to the Service List maintained by the Commission's Data Center on this 21st day of January, 2021.

/s/ Kevin A. Thompson