BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Third Prudence Review of)	
Evergy Missouri West, Inc. d/b/a Evergy)	Case No. EO-2020-xxxx
Missouri West's RESRAM as required by)	
20 CSR 4240-20.100(6)11 and 20.100(6)26)	

STAFF'S NOTICE OF START OF THIRD RESRAM PRUDENCE REVIEW

COMES NOW the Staff of the Missouri Public Service Commission, by and through undersigned counsel, and for its *Notice of Start of Third RESRAM Prudence Review* ("Notice") and informs the Commission that the Staff has initiated its third RESRAM ("Renewable Energy Standard Rate Adjustment Mechanism") prudence review as required by Evergy Missouri West, Inc. d/b/a Evergy Missouri West's (EMW) tariff and Commission Rule 20 CSR 4240-20.100(6)11 and 20.100(6)26. Further in support, Staff states:

- 1. EMW's RESRAM was approved by the Commission in Case
 No. EO-2014-0151 and became effective December 1, 2014.1
- 2. EMW's tariff sheet (P.S.C. MO. No. 1, 2nd Revised Sheet No. 137.2, RENEWABLE ENERGY STANDARD RATE ADJUSTMENT MECHANISM Rider RESRAM (continued) ELECTRIC) states in pertinent part "A prudence review shall be conducted no less frequently than at twenty four (24) month intervals." This triggers a prudence review, as Staff last completed a prudence review of EMW's RESRAM in EMW's last rate case ER-2018-0146, for the period January 1, 2016 through December 31, 2017.

¹ See *Order Approving Tariff Filing In Compliance With Commission Order* (EFIS Item No. 55), issued November 18, 2014, in Case No. EO-2014-0151.

- 3. Staff's prudence review will cover the period of January 1, 2018 through December 31, 2019. Staff plans to file its recommendation and report on its review of this period by Tuesday July 28, 2020, within the 180 day requirement of the rule.
- 4. Staff initiates its EMW RESRAM review pursuant to Commission Rule 20 CSR 4240-20.100(6)11 which in relevant part states "Commission approval of proposed rate schedules, to establish or modify an RESRAM, shall in no way be binding upon the commission in determining the ratemaking treatment to be applied to RES compliance costs during a subsequent general rate proceeding when the commission may undertake to review the prudence of such costs..." (emphasis added)
- 5. Staff is filing its notice to comply with the notice timeline requirement of 20 CSR 4240-100.20(6)26.B. requiring "...Staff shall file notice within ten (10) days of starting its prudence audit."

WHEREFORE, Staff prays the Commission accept its notice of start of its third EMW RESRAM prudence review.

Respectfully submitted,

/s/ Nicole Mers

Nicole Mers Deputy Counsel Missouri Bar No. 66766 P.O. Box 360 Jefferson City, MO 65012 (573) 751-6651 (Telephone) (573) 751-9285 (Fax) Nicole.mers@psc.mo.gov

Attorney for the Staff of the Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed with first-class postage, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 30th day of January, 2020.

/s/ Nicole Mers