

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

In the Matter of Every Missouri West, Inc. d/b/a)
Every Missouri West’s Tariff Revision to) **File No. ER-2020-0189**
Implement Rate Adjustments Required by) Tracking No. JE-2020-0109
20 CSR 4240-20.090(8) and the Company’s)
Approved Fuel and Purchased Power Cost)
Recovery Mechanism)

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and submits its Recommendation as follows:

1. On December 31, 2019, Every Missouri West, Inc. d/b/a Every Missouri West (“Every Missouri West”) submitted direct testimony and a tariff designed to implement an adjustment to its Fuel and Purchased Power Adjustment Clause (“FAC”). The submitted tariff bears an effective date of March 1, 2020.
2. Concurrently on December 31, 2019, Every Missouri West submitted a true-up filing in File No. EO-2020-0188 to identify the net fuel costs it over- or under-charged customers during the twenty-second Recovery Period prescribed by its FAC. This amount is used when calculating the new Fuel Adjustment Rates (“FARs”) in this case.
3. On January 2, 2020, the Commission ordered Staff to examine and analyze Every Missouri West’s filings in this case, and to file its recommendation no later than January 30, 2020, as required by Rule 20 CSR 4240-20.090(8).
4. Any party wishing to intervene was given a deadline of January 16, 2020 to file an application with the Commission.
5. No parties have filed to intervene in this matter.

6. Staff's *Memorandum*, attached hereto as Appendix A and incorporated by reference, recommends the Commission issue an order indicating the proposed revised tariff sheet Evergy Missouri West filed on December 31, 2019 become effective on March 1, 2020, by operation of law. Further, Staff's recommendation comes with the acknowledgment that Evergy Missouri West's FAC allows for retrospective adjustments in subsequent FAR filings, at which time there is expected to be a more comprehensive understanding of the methodology and framework of 393.1655, RSMo, and its impact on adjustments for Evergy Missouri West in the future.

7. Commission Rule 20 CSR 4240-20.090(8) states: "An electric utility that has a FAC shall file proposed tariff sheet(s) to adjust its FARs following each accumulation period." The rule requires Staff to "determine if the proposed adjustment to the FARs is in accordance with the provisions of this rule, section 386.266, RSMo, and the FAC mechanism established, continued, or modified in the utility's most recent general rate proceeding."¹

8. If so, "Within sixty (60) days after the electric utility files its testimony and tariff sheet(s) to adjust its FARs, the commission shall either (1) Issue an interim rate adjustment order approving the tariff sheet(s) and the adjustments to the FARs; (2) Allow the tariff sheet(s) and the adjustments to the FARs to take effect without commission order; or..." the commission may reject the proposed rate sheets, suspend the timeline, set a prehearing date, and order the parties to propose a procedural schedule.²

¹ Commission Rule 20 CSR 4240-20.090(8)(F).

² Commission Rule 20 CSR 4240-20.090(8)(H)1-3.

9. Evergy Missouri West's filing in this case requests Commission approval of one tariff sheet bearing an effective date of March 1, 2020, that revises the current FARs in its FAC. The filing includes testimony and work papers of Evergy Missouri West witness Lisa A. Starkebaum supporting the Company's calculation of the Fuel and Purchased Power Adjustment ("FPA").

10. The FPA amount, subject to prudence review, is \$3,013,594. This represents the total requested decrease in the amount sought to be collected in customer FAC charges over the applicable recovery period. The FPA amount includes the difference between Annual Net Energy Costs ("ANEC") and Net Base Energy Cost ("B") the Company experienced during the 25th Accumulation Period, including application of the Commission approved 95 percent sharing ratio, plus the amount from the true-up for the 22nd Recovery Period in File No. EO-2020-0188, and applicable interest.

11. The proposed changes to FARs will result in a decrease to the typical Evergy Missouri West residential non-large customer's monthly bill (1,000 kWh), before taxes, from \$4.95 to \$1.75, for a decrease of \$3.20.

12. Effective January 1, 2019, Evergy Missouri West elected to make plant in service accounting ("PISA") deferrals permitted under 393.1400, RSMo, and further refined under 393.1655, RSMo. Evergy Missouri West is prohibited from not just increasing its Large Power Service class members above a 2% compound annual growth rate ("CAGR"), but is also prohibited from increasing its overall customer rates by no more than 3% CAGR through the end of 2023.

13. As a result of Section 393.1655, RSMo, Evergy Missouri West's FAR filing proposes implementation of separate rates for Large Power Service customers and Non-Large Power Service customers.

14. This is the third filing where the provisions of Sections 393.1400.5 and 393.1655 RSMo have been applied. This filing is not affected by any PISA adjustments; however, Evergy Missouri West's proposed bifurcation of the FAC in this FAR filing represents one way – but not the only way – to perform such implementation. Again, Staff's recommendation comes with the understanding that Evergy Missouri West's FAC allows for retrospective adjustments in subsequent FAR filings as more data regarding the growth rate limitations and methodologies under 393.1655, RSMo, is collected and more experience with the statute refines the approaches taken.

15. Staff would also like to note that Evergy Missouri West removed a credit of \$429,299 related to the cost of removing coal and propane from the retired Sibley generation facility. This follows the previous removal of \$185,857 worth of expenses related to the same costs in the previous FAR filing.³ Staff will continue to verify that these related costs/revenues are removed from each FAR filing, as well as verify that all costs were correctly removed in Evergy Missouri West's next prudence review.

16. Staff has verified that Evergy Missouri West has filed its 2018 annual report and is not delinquent on any assessment. Evergy Missouri West is current on its submission of its Surveillance Monitoring reports as required in 20 CSR 4240-20.090(6), and its periodic monthly reports as required by 20 CSR 4240-20.090(5).

³ See ER-2019-0413.

With the exception of the true-up filing in File No. EO-2020-0188, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

WHEREFORE, Staff recommends the Commission issue an order indicating the 2nd Revised Sheet No. 127.23 Canceling 1st Revised Sheet No. 127.23 become effective on March 1, 2020 by operation of law.

Respectfully Submitted,

/s/ Travis J. Pringle

Travis J. Pringle
Missouri Bar No. 71128
Legal Counsel for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Mo 65102-0360
(573) 751-4140 (Telephone)
(573) 751-9285 (Facsimile)
(Email) travis.pringle@psc.mo.gov

CERTIFICATE OF SERVICE

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

/s/ Travis J. Pringle

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2020-0189, Tariff Tracking No. JE-2020-0109
Evergy Missouri West, Inc., d/b/a Evergy Missouri West

FROM: Brooke Mastrogiannis, Utility Regulatory Auditor IV
Lisa Wildhaber, Utility Regulatory Auditor III
Cynthia M. Tandy, Utility Regulatory Auditor II

DATE: /s/ Brad J. Fortson 01/30/2020 /s/ Travis Pringle 01/30/2020
Energy Resources Dept. / Date Staff Counsel Department / Date

SUBJECT: Staff Recommendation for Approval of Tariff Sheet Filed to Change Rates Related to Evergy Missouri West, Inc.’s, d/b/a Evergy Missouri West Fuel Adjustment Clause Pursuant to the Commission’s Report and Order in Case No. ER-2018-0146

DATE: January 30, 2020

Staff Recommendation

On December 31, 2019, Evergy Missouri West, Inc., d/b/a Evergy Missouri West (“Evergy Missouri West”), f/k/a KCP&L Greater Missouri Operations Company (“GMO”), filed one (1) tariff sheet, 2nd Revised Sheet No. 127.23 Canceling 1st Revised Sheet No. 127.23, bearing a proposed effective date of March 1, 2020, to revise Evergy Missouri West’s current annual Fuel Adjustment Rates (“FARs”) (lines 16, 19, 22, and 25 on 2nd Revised Sheet No. 127.23) of its Fuel Adjustment Clause (“FAC”). Evergy Missouri West filed direct testimony of its witness Lisa A. Starkebaum on December 31, 2019, and submitted to Staff work papers in support of the direct testimony and filed tariff sheet. The Commission assigned the tariff sheet to Tariff Tracking No. JE-2020-0109 and ordered Missouri Public Service Commission Staff (“Staff”) to file its recommendation concerning the tariff sheet no later than January 30, 2020.

Staff recommends the Commission issue an order indicating proposed 2nd Revised Sheet No. 127.23 of the FAC for Evergy Missouri West become effective on March 1, 2020, by operation of law.

Accumulation Period 25 FARs

The testimony and work papers include information supporting Evergy Missouri West’s calculation of the Fuel and Purchased Power Adjustment (“FPA”) amount of \$3,013,594 (line 11¹

¹ Line 11 is the FPA amount subject to prudence review, line 11.1 is the PISA amount deferred to a PISA regulatory asset account, and line 11.2 is the FPA amount subject to recover in true-up.

of 2nd Revised Sheet No. 127.23) for Accumulation Period 25 (“AP25”) (June 1, 2019 through November 30, 2019) reflecting the sum of:

1. The amount of \$2,316,614 on line 7 of 2nd Revised Sheet No. 127.23, which is equal to 95% of the difference between a) Eversource Missouri West’s Missouri jurisdiction² Actual Net Energy Costs (ANEC) (fuel costs plus net emission costs plus purchased power costs plus transmission costs less off-system sales revenue less renewable energy credit revenue) and b) Eversource Missouri West’s Missouri jurisdiction Net Base Energy Cost;
2. The true-up amount³ reflected on line 8 of 2nd Revised Sheet No. 127.23, of \$128,984; and
3. The interest amount reflected on line 9 of 2nd Revised Sheet No. 127.23, of \$567,995.

The Current Period Eversource Missouri West FAR of \$0.00033 per kWh for Large Power Service rate class (line 13 of 2nd Revised Sheet No. 127.23) is equal to Eversource Missouri West’s Large Power Service rate class FPA amount of \$797,189 divided by the estimated Recovery Period 25 (“RP25”)⁴ Retail Net System Input (“RNSI”) at the generator level⁵ (“S_{RP}”) of 2,415,723,749 kWh (line 12 of 2nd Revised Sheet No. 127.23).

The Current Period Eversource Missouri West FAR of \$0.00033 per kWh for Non-Large Power Service rate classes (line 13 of 2nd Revised Sheet No. 127.23) is equal to Eversource Missouri West’s Non-Large Power Service rate class FPA amount of \$2,216,405 divided by the estimated RP25 RNSI at the S_{RP} of 6,667,726,054 kWh (line 12 of 2nd Revised Sheet No. 127.23).

Because of differences in line losses for secondary, primary, substation, and transmission secondary voltage service levels,⁶ tariff sheet lines 14, 17, 20, and 23 reflect different current

² See line 4 of 2nd Revised Sheet No. 127.23 and definition of J on Original Sheet No. 127.21.

³ The true-up amount was requested by Eversource Missouri West in its December 31, 2019 filing in File No. EO-2020-0188.

⁴ RP25 includes March 1, 2020 through February 28, 2021.

⁵ See definition of S_{RP} on Original Sheet No. 127.22.

⁶ The voltage adjustment factors (VAFs) for Eversource Missouri West for primary, secondary, substation and transmission voltage service levels are included on lines 26 through 29 of 2nd Revised Sheet No. 127.23.

period FARs for service taken at secondary, primary, substation, and transmission voltage service levels.

The Accumulation Periods, Recovery Periods, and other specifications of Evergy Missouri West's FAC for AP25 are set out in its tariff sheets identified in the following table:

For Service Provided December 6, 2018 and Thereafter
Original Sheet No. 127.13
Original Sheet No. 127.14
Original Sheet No. 127.15
Original Sheet No. 127.16
Original Sheet No. 127.17
Original Sheet No. 127.18
Original Sheet No. 127.19
Original Sheet No. 127.20
Original Sheet No. 127.21
Original Sheet No. 127.22
Original Sheet No. 127.23
1 st Revised Sheet No. 127.23

Listed below are Evergy Missouri West's proposed Current Annual FARs on 2nd Revised Sheet No. 127.23, and the Evergy Missouri West Current Annual FARs on 1st Revised Sheet No. 127.23 together with the changes between them for primary, secondary, substation, and transmission voltage service levels.

Evergy Missouri West Current Annual Fuel Adjustment Rates \$ per kWh			
Service	Proposed 2nd Revised Sheet No. 127.23	Now Effective 1st Revised Sheet No. 127.23	Difference
Secondary-Large Power Service	\$0.00133	\$0.00337	\$0.00197 Decrease
Secondary-Non-Large Power Service	\$0.00175	\$0.00495	\$0.00311 Decrease
Primary-Large Power Service	\$0.00132	\$0.00329	\$0.00204 Decrease
Primary-Non-Large Power Service	\$0.00173	\$0.00484	\$0.00320 Decrease
Substation-Large Power Service	\$0.00129	\$0.00327	\$0.00198 Decrease
Substation-Non-Large Power Service	\$0.00170	\$0.00482	\$0.00312 Decrease
Transmission-Large Power Service	\$0.00129	\$0.00327	\$0.00198 Decrease
Transmission-Non-Large Power Service	\$0.00169	\$0.00481	\$0.00312 Decrease

The proposed changes to FARs will result in a decrease to the typical Evergy Missouri West residential non-large customer's monthly bill (1,000 kWh) before taxes of \$3.20, i. e., from \$4.95 to \$1.75.

In her direct testimony Ms. Starkebaum states:

Evergy Missouri West's ANEC are \$5.4 million lower in the 25th accumulation period as compared to the previous 24th accumulation period primarily due to a decrease in purchased power expense of \$4.9 million. Fuel costs are slightly higher in the 25th accumulation period amounting to \$487K due to 6% more generation which in part allowed for the decrease in purchased power. In addition, there was a 7% increase in retail load requirements or Net System Input ("NSI") in the 25th accumulation period over the 24th accumulation period. While the months of June, July and August were 6% cooler than normal, September was 87% warmer than normal as shown in the table below⁷. In addition, October and November were 38% colder than normal. Lastly, there was excess generation to sell amounting to an increase in off-system sales revenues of \$924K compared to the prior 24th accumulation period.⁸

⁷ The table is not shown here, but is shown in Lisa A. Starkebaum's testimony at the bottom of pg. 5.

⁸ Evergy Missouri West witness Lisa A. Starkebaum's direct testimony, pg. 5, ln. 1-12.

Plant in Service Accounting (PISA) Deferrals Permitted Under Section 393.1400, RSMo, And Limitations On Rate Modifications Permitted Under Section 393.1655, RSMo

On December 31, 2018, Eversource Missouri West elected to make the deferrals set forth in Section 393.1400.5 RSMo - Plant in Service Accounting (“PISA”) effective January 1, 2019 through, at least, December 31, 2023. As stated in Lisa A. Starkebaum’s testimony:

...Second, the Company has performed the plant in service accounting (“PISA”) calculations to determine the impact, if any, of this semi-annual FAR filing on the Average Overall Rate and Class Average Overall Rate for the Large Power customer class as set forth in the rule under the provisions of section 393.1655 RSMo, rate cap limitations. The compound average growth rate cap provisions of section 393.1655 RSMo., applied to this FAR filing are 3.73% for the average overall rate cap and 2.48% for the class average overall rate cap for Large Power customers. The change in the FAC charge proposed in this filing does not exceed the average overall rate by more than 3.73% and, as such, the provisions of section 393.1655.5 do not affect this FAR filing. In addition, the Company is using projected Large Power sales to calculate a Large Power FAC rate. In accordance with section 393.1655.6 RSMo., the proposed FAC charge applicable to Large Power customers does not exceed 2.48% of the class average overall rate for this rate class. Therefore, there are no PISA adjustments in this FAR filing.⁹

Eversource Missouri West’s current FAR filing is not affected by any PISA adjustments. However, since there were approved separate rates for Large Power Service customers and Non-Large Power Service customers in the previous FAR filing, that results in reflecting separate rates for the Large Power Service customers and Non-Large Power Service customers in this FAR filing as well.

This is the third filing where Sections 393.1400.5 and 393.1655 provisions have been applied to this, or any other, rate adjustment. Staff’s recommendation comes with the acknowledgment that Eversource Missouri West’s FAC allows for retrospective adjustments in subsequent FAR filings, if in the future there is a more comprehensive understanding of the

⁹ *Id.*, pg. 6, ln. 7-21.

methodology and framework of 393.1655, RSMo., and its impact on adjustments for Eversource Missouri West in the future.

Retirement of Sibley Generation Facility

In the last FAR filing, Case No. ER-2019-0413, Eversource Missouri West removed \$185,857 of expenses related to the cost of removal of coal and propane at the retired Sibley generation facility. In this current FAR filing, Eversource Missouri West removed a credit of \$429,299 related to the same type of costs/revenues for the retired Sibley generation facility. The Company stated in their *KCP&L Greater Missouri Operations Company's Response to Order Directing Filing* filed on September 12, 2019 in Case No. ER-2019-0413, "GMO will not seek to recover the \$185,857 (the amount removed by GMO from the FAR associated with Sibley fuel transfers) in accumulation period 24 or any other accumulation period in its Fuel Adjustment Clause." Going forward, Staff will continue to verify in the Company work papers that these related costs/revenues are removed from each FAR filing. In addition, in the next Eversource Missouri West prudence review, Staff will verify all related costs/revenues were correctly removed from the FAC for all months under the review period.

Lake Road Steam Allocation of Auxiliary Power

The Commission, in Case No. EO-2019-0067, issued a Report and Order on November 6, 2019 denying The Office of the Public Counsel's ("OPC") request for a prudence adjustment related to the Lake Road auxiliary power issue. On December 5, 2019, OPC filed a Motion for Rehearing or Reconsideration. Consequently, Eversource Missouri West has not made any additional adjustment for the auxiliary power in this filing.

Staff Review

Staff reviewed Eversource Missouri West's proposed 2nd Revised Sheet No. 127.23 Canceling 1st Revised Sheet No. 127.23, the direct testimony of Eversource Missouri West witness Lisa A. Starkebaum and the work papers in this filing, in addition to Eversource Missouri West's monthly information reports filed in compliance with 20 CSR 4240-20.090(5) for AP25. Staff verified that the actual fuel and purchased power costs less off-system sales revenues match the fuel and purchased power costs less off-system sales revenues in Eversource Missouri West's proposed

2nd Revised Tariff Sheet No. 127.23. Staff reviewed Eversource Missouri West's monthly interest rates that are applied to 95% of the jurisdictional monthly cumulative under-/over- recovery of base fuel and purchased power costs for AP25 and verified that the monthly interest rates and calculations of monthly interest amounts are correct.

The information filed with the proposed tariff sheet and work papers include sufficient data to calculate Eversource Missouri West's FARs based on the actual fuel, purchased power, emission allowance and transmission costs net of off-system sales revenue and renewable energy credit revenue provided by Eversource Missouri West for AP25.

Attachment A includes three charts which provide a summary of Eversource Missouri West's twenty-five (25) FAC rate adjustment filings. Chart 1 illustrates a) Eversource Missouri West's actual net energy cost, net base energy cost and under- (over-) recovery amounts for each accumulation period, and b) that there have been twenty-one (21) accumulation periods with under-recovered amounts and four (4) accumulation periods with over-recovered amounts (AP10, AP16, AP17 and AP18). Chart 2 illustrates Eversource Missouri West's FAC cumulative under-recovered amount at the end of each accumulation period with the cumulative under-recovered amount through AP25 of approximately \$312 million. Chart 3 illustrates Eversource Missouri West's FAC cumulative under-recovered percentage at the end of each accumulation period with the cumulative under-recovered percentage through AP25 of approximately 12%.

Staff Recommendation

Staff is of the opinion that the tariff sheet filed on December 31, 2019, complies with the Commission's *Report and Order* in Case No. ER-2018-0146, Commission Rule 20 CSR 4240-20.090 (Electric Utility Fuel and Purchased Power Cost Recovery Mechanisms Filing and Submission Requirements), and Eversource Missouri West's FAC as embodied in its tariff.

Commission Rule 20 CSR 4240-20.090(8)(H) provides in part:

(H) Within sixty (60) days after the electric utility files its testimony and tariff sheet(s) to adjust its FARs, the commission shall either—

1. Issue an interim rate adjustment order approving the tariff sheet(s) and the adjustments to the FARs;

2. Allow the tariff sheet(s) and the adjustments to the FARs to take effect without commission order; or

3. If it determines the adjustment to the FARs is not in accordance with the provisions of this rule, section 386.266, RSMo, and the FAC mechanism established in the electric utility's most recent general rate proceeding, reject the proposed rate sheets, suspend the timeline of the FAR adjustment filing, set a prehearing date, and order the parties to propose a procedural schedule. The commission may order the electric utility to file tariff sheet(s) to implement interim adjusted FARs to reflect any part of the proposed adjustment that is not in question;

Evergy Missouri West requested that the 2nd Revised Tariff Sheet No. 127.23 Canceling 1st Revised Tariff Sheet No. 127.23, filed December 31, 2019, become effective on March 1, 2020. Staff, based on its examination and analysis of the information Evergy Missouri West filed and submitted in this case, recommends the Commission issue an order indicating the following proposed revised tariff sheet, take effect by operation of law on March 1, 2020:

P.S.C. Mo. No. 1
2nd Revised Sheet No. 127.23 Canceling 1st Revised Sheet No. 127.23

Staff has verified that Evergy Missouri West is not delinquent on any assessment and has filed its 2018 Annual Report. Evergy Missouri West is current on its submission of its Surveillance Monitoring reports as required in 20 CSR 4240-20.090(6) and its monthly reports as required by 20 CSR 4240-20.090(5). Except for Evergy Missouri West's RP22 true-up filing in File No. EO-2020-0188 (also filed on December 31, 2019), Staff is not aware of any other matter pending before the Commission that affects or is affected by this tariff filing. Staff's recommendation for the Current Period FARs is solely based on the accuracy of Evergy Missouri West's calculations, and is not indicative of the prudence of the fuel costs during AP25.

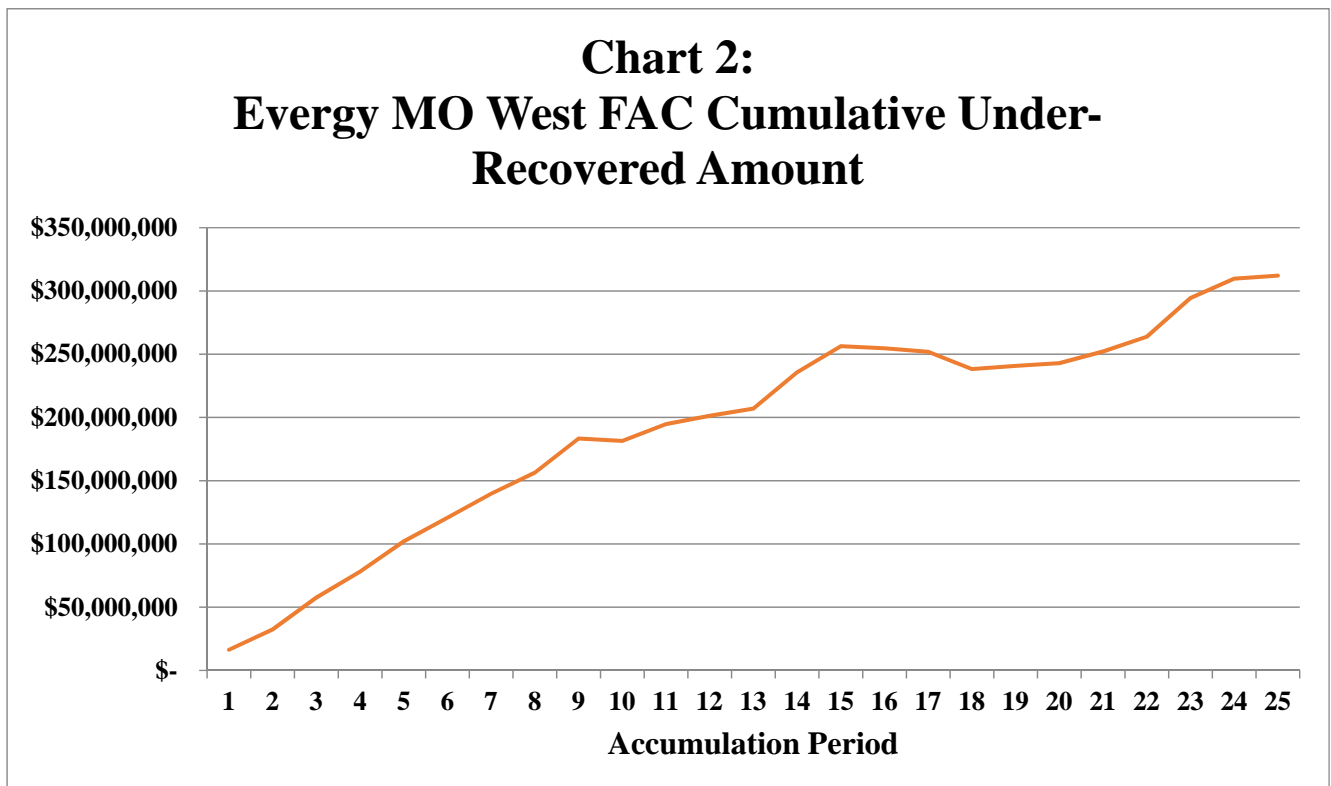
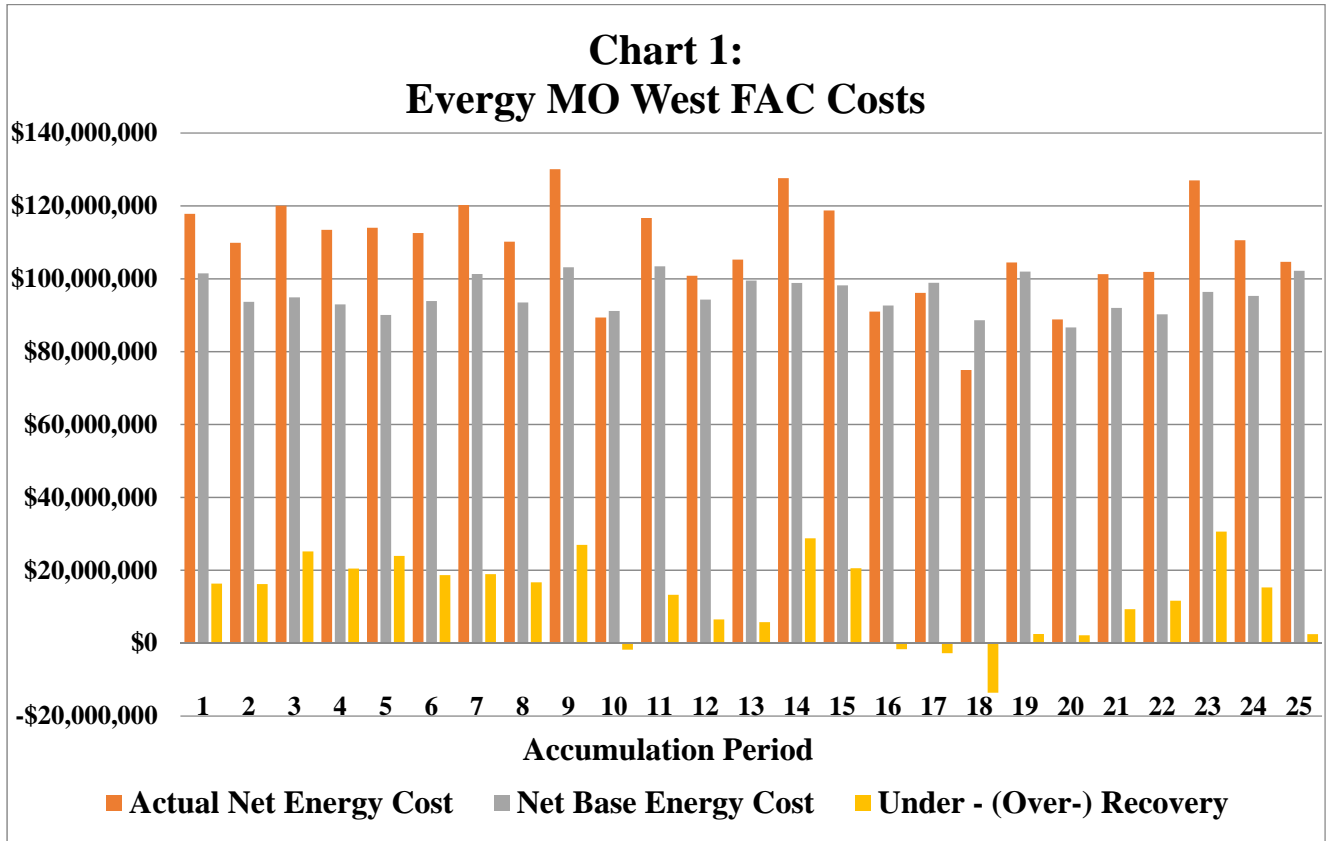
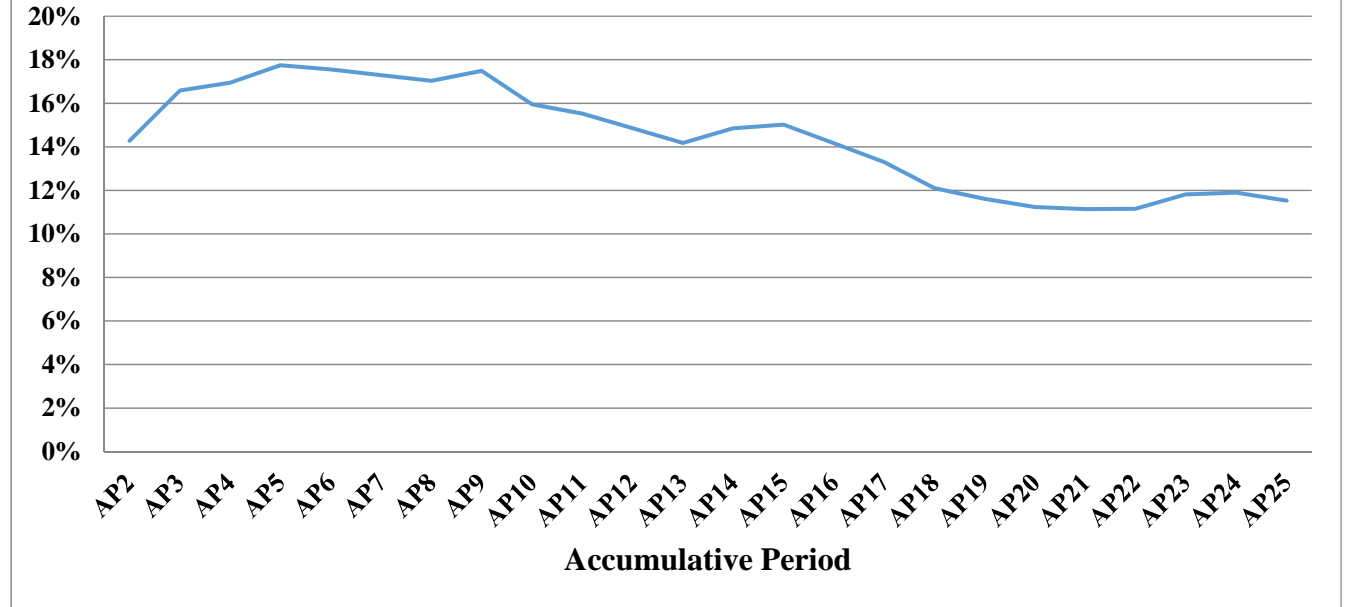


Chart 3: Evergy MO West FAC Cumulative Under-Recovered Percent



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 Tariff Revision) File No. ER-2020-0189
to Implement Rate Adjustments Required by)
20 CSR 4240-20.090(8) and the Company's)
Approved Fuel and Purchased Power Cost)
Recovery Mechanism)

AFFIDAVIT OF BROOKE MASTROGIANNIS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

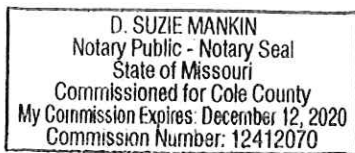
COMES NOW BROOKE MASTROGIANNIS and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

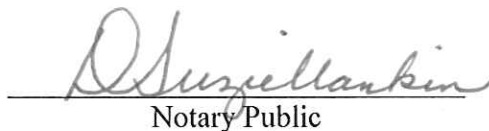
Further the Affiant sayeth not.


BROOKE MASTROGIANNIS

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 30th day of January 2020.




Notary Public

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 Tariff Revision)
to Implement Rate Adjustments Required by)
20 CSR 4240-20.090(8) and the Company's)
Approved Fuel and Purchased Power Cost)
Recovery Mechanism)

File No. ER-2020-0189

AFFIDAVIT OF LISA WILDHABER

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

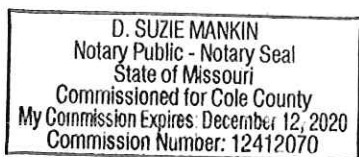
COMES NOW LISA WILDHABER and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

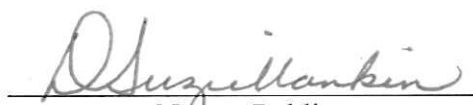
Further the Affiant sayeth not.


LISA WILDHABER

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 30th day of January 2020.




Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

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d/b/a Evergy Missouri West's Tariff Revision)
to Implement Rate Adjustments Required by)
20 CSR 4240-20.090(8) and the Company's)
Approved Fuel and Purchased Power Cost)
Recovery Mechanism)

File No. ER-2020-0189

AFFIDAVIT OF CYNTHIA M. TANDY

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW CYNTHIA M. TANDY and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.




CYNTHIA M. TANDY

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 30th day of January 2020.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: December 12, 2020
Commission Number: 12412070



Notary Public