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 2023 Integrated Resource Plan Annual Update Filing (Case No. EO-2023-0213) (Case No. EO-2023-0213) (Case No. EO-2023-0213)	
THE OFFICE OF THE PUBLIC COUNSEL'S COMMENTS	
COMES NOW the Office of the Public Counsel and, by the extended August 31, 20	123
ling date the Commission ordered for comments on Evergy Missouri West's 2023 Integra	itec
esource Plan Annual Update Filing, provides its comments in the attached verified memorand	lum
f Public Counsel employees Lena Mantle, P.E., and Jordan Seaver, Policy Analyst. They po	oin
ut that:	
1) Evergy Missouri West plans to continue to rely excessively on the Southwest Power P	00
energy market and capacity purchases thereby exposing its retail customers to the poten	ıtia
of extreme costs ¹ ;	
2) The capacity balance graph of Evergy Missouri West's preferred plan as shown on pa	age
97 of its annual update is misleading;	
3) Evergy Missouri West does not have the **	
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4) Evergy Missouri West's explanation in its annual update regarding the potential acquisit	ior
of a portion of the Dogwood Energy Center is incomplete;	
5) It is unclear how Evergy Missouri West is planning for the addition of Schedule M	ΚT
customers;	

¹ For example, due to Storm Uri Evergy Missouri West incurred \$280,667,566 in fuel and purchased power costs plus \$27,143,680 in carrying costs that the Commission has authorized Evergy Missouri West to recoup by issuing bonds secured by customer charges (Case No. EF-2022-0155). Those costs are largely due to Evergy Missouri West's SPP energy market purchases during Storm Uri.

- 6) Evergy Missouri West's projected baseline customer energy usage and demand growth are essentially flat, its demand-side management and demand response programs extremely costly with little impact—impact likely to occur without them; therefore, imposing the costs of those programs on Evergy Missouri West's customers is not justified; and
- 7) Evergy Missouri West's workpapers are inconsistent with its annual update.

Respectfully,

/s/ Nathan Williams

Nathan Williams Chief Deputy Public Counsel Missouri Bar No. 35512

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Attorney for the Office of the Public Counsel

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 31st day of August 2023.

/s/ Nathan Williams