

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

In the Matter of the 2020 Integrated Resource)	
Plan Annual Update for Evergy Metro, Inc. d/b/a/a)	<u>File No. EO-2020-0280</u>
Evergy Missouri Metro)	

In the Matter of the 2020 Integrated Resource)	
Plan Annual Update for Evergy Missouri West,)	<u>File No. EO-2020-0281</u>
Inc., d/b/a Evergy Missouri West)	

STAFF REPORT

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its *Staff Report* respectfully states as follows:

1. Staff has reviewed the various filings made to these dockets by Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (collectively, "the Companies"), and has participated in the workshop discussions held on April, 8, 2020, as well as additional discussions with the Companies.

2. On April 17, 2020, the Companies gave notice that no changes would be made to the Annual Update Reports as a result of the discussions at the April 8, 2020 workshop.

3. However, the Companies' Annual Update Reports and the discussions at the workshop haven given Staff concerns that the Companies have not satisfied certain aspects of the Chapter 22 rule. Those concerns are:

- a. Failure to achieve the policy objection of 20 CSR 4240-22.010;
- b. Failure to achieve the goal of developing a set of alternative resource plans ("ARPs") based on substantively different mixes of supply-side

and demand-side resources and variations in the timing of resource acquisitions as set forth in 20 CSR 4240-22.060(3);

- c. Failure to provide the depth and detail in the Annual Reports generally commensurate with the magnitude and significance of the changing conditions since the last filed triennial compliance filing or annual update as required in part by 20 CSR 4240-22.080(3)(B);
- d. Failure to consider mitigation of risks associated with critical uncertain factors that will affect the actual costs associated with ARPs as required by 20 CSR 4240-22.010(2)(C)1;
- e. Failure to consider mitigation of rate increases associated with ARPs as required by 20 CSR 4240-22.010(2)(C)3; and
- f. Failure to describe and document its assessment of whether, and under what circumstances, other uncertain factors associated with the preferred resource plan could materially affect the performance of the preferred resource plan relative to ARPs as required in part by 20 CSR 4240-22.070(2).

4. To remedy these deficiencies, Staff recommends that the Commission order the Companies to address, in its future Chapter 22 filings, Staff's issues and criticisms identified in the *Staff Report*.¹

5. The *Staff Report*, attached hereto as Appendix A, discusses these matters more fully.

¹ See EO-2012-0184, *Order Regarding 2012 Integrated Resource Planning Annual Update Summary*.

WHEREFORE, Staff respectfully submits its *Staff Report* regarding the Annual Updates of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc., d/b/a Evergy Missouri West.

Respectfully Submitted,

/s/ Travis J. Pringle

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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 18th day of May, 2020.

/s/ Travis J. Pringle