

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

In the Matter of the Fourth Prudence )  
Review of Costs Subject to the )  
Commission-Approved Fuel Adjustment ) Case No. EO-2022-0064  
Clause of Evergy Metro, Inc. d/b/a Evergy )  
Missouri Metro )

In the Matter of the Tenth Prudence )  
Review of Costs Subject to the )  
Commission-Approved Fuel Adjustment ) Case No. EO-2022-0065  
Clause of Evergy Missouri West, Inc. )  
d/b/a Evergy Missouri West )  
)

**PUBLIC COUNSEL’S POSITION STATEMENT**

**COMES NOW** the Office of the Public Counsel (“Public Counsel”) and, for its position on the listed issues, states:

**Issue:** Was it imprudent for Evergy Missouri Metro and Evergy Missouri West to allow 1,153,813 and 79,994 renewable energy credits (“RECs”), respectively, to expire during the review periods of these cases rather than to take action which would have allowed the companies to generate revenues from those RECs? If so, should Staff’s recommended disallowances be adopted by the Commission?

**Position:** Both Evergy Missouri Metro and Evergy Missouri West were imprudent to allow the respective 1,153,813 and 79,994 of RECs to expire during the review periods of these cases rather than selling them, and the Commission should adopt Staff’s quantifications of the revenues those sales would have generated as prudence disallowance amounts to flow to Evergy Missouri Metro’s and Evergy Missouri West’s customers through their respective fuel adjustment clauses.

Respectfully,

/s/ Nathan Williams

Nathan Williams  
Chief Deputy Public Counsel  
Missouri Bar No. 35512

Office of the Public Counsel  
Post Office Box 2230  
Jefferson City, MO 65102  
(573) 526-4975 (Voice)  
(573) 751-5562 (FAX)  
[Nathan.Williams@opc.mo.gov](mailto:Nathan.Williams@opc.mo.gov)

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 19<sup>th</sup> day of July 2022.

/s/ Nathan Williams