

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

In the Matter of the Application of Kansas)
City Power & Light Company for)
Authority to Extend the Transfer of)
Functional Control of Certain Transmission)
Assets to the Southwest Power Pool, Inc.)

Case No. EO-2012-0135

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for)
Authority to Extend the Transfer of)
Functional Control of Certain Transmission)
Assets to the Southwest Power Pool, Inc.)

Case No. EO-2012-0136

**JOINT MOTION OF EVERGY MISSOURI METRO, EVERGY MISSOURI WEST,
STAFF OF THE MISSOURI PUBLIC SERVICE COMMISSION,
OFFICE OF THE PUBLIC COUNSEL, AND DOGWOOD ENERGY, LLC
TO MODIFY STIPULATIONS**

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”), Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) (collectively, the “Companies”)¹ the Staff of the Missouri Public Service Commission (“Staff”), the Office of the Public Counsel (“OPC”), and Dogwood Energy, LLC (“Dogwood”) (individually, “Party” and collectively, “Parties”) hereby file this Joint Motion to Further Modify Stipulation and Agreements (“Joint Motion”) and state as follows:

1. On June 19, 2013, the Commission approved separate Stipulation and Agreements in the above captioned dockets, which were filed on May 16, 2013 (“May 16, 2013 Stipulations”). Section II.E(4) of the May 16, 2013 Stipulations contains a provision requiring KCP&L (now known as Evergy Missouri Metro) and GMO (now known as Evergy Missouri West) to file a pleading by June 30, 2017 regarding its continued participation in a regional

transmission organization or its operation under an independent coordinator of transmission. Attachment A to each of the May 16, 2013 Stipulations sets forth certain dates for meetings, in particular, with the Staff, and OPC concerning the content and planning of the benefit-cost studies and the associated Interim Reports.

2. On August 22, 2016, the Companies filed a motion to be excused from conducting the benefit-cost studies and filing the 2017 Interim Reports. The Companies argued that their exit fee obligations from the Southwest Power Pool (“SPP”), combined with the positive benefit-cost ratios shown by various analyses that had been performed by SPP, made incurring the cost to perform the benefit-cost studies unwarranted at that time. On September 14, 2016, the Commission in an Order Granting Motion to Relieve KCP&L and GMO of Stipulation Requirements (“September 14, 2016 Order”) approved the Companies’ motion to modify the separate Stipulation and Agreements, relieving the Companies of their obligation to conduct the impending benefit-cost studies and to file the related 2017 Interim Reports.

3. On August 23, 2019, the Companies file a motion to further modify Stipulations and requested an order that the Companies not be required to perform the analysis needed to produce the 2020 Interim Report nor provide the Interim Report. No party opposed the motion and the Commission issued an order granting the modification on October 30, 2019. The October 30, 2019 Order also provided that the Companies file additional information regarding the benefits of SPP participation in its June 30, 2020 application for continued SPP participation. The requested information is attached as **Attachment C**. This information includes an estimate

¹ Effective October 7, 2019, Evergy Missouri Metro adopted the service territory and tariffs of Kansas City Power & Light Company (“KCP&L”) and Evergy Missouri West adopted the service territory and tariffs of KCP&L Greater Missouri Operations Company (“GMO”).

of the benefits and costs of remaining in the SPP by looking at the load ratio share approximation methodology as suggested by the Commission. The following information can be found in Attachment C.

- i. The SPP calculated load ratio share of the costs and benefits to the Missouri portion of the SPP footprint, and to Evergy Missouri Metro and Evergy Missouri West separately, for the Value of Transmission Study.
- ii. The SPP calculated load ratio share of the costs and benefits to the Missouri portion of the SPP footprint, and to Evergy Missouri Metro and Evergy Missouri West separately, for the Integrated Marketplace Benefits Study.
- iii. The Missouri portion of the SPP footprint and Evergy Missouri Metro and Evergy Missouri West specific cost and benefit results from the Regional Cost Allocation Review II study.

4. Since the October 30, 2019 Order, the Companies have had further discussions with the Staff and OPC regarding the Companies' desired proposals concerning the terms and conditions of future RTO participation beyond September 30, 2021. Additionally, the Companies informed Staff and OPC that the Companies had requested that SPP provide them with a current estimate of the Companies' transmission related exit fee obligations if the Companies were to withdraw from SPP. The combined exit fee estimate for that SPP provided to the Companies is in excess of ** [REDACTED] ** total for the Companies, and ** [REDACTED] ** total when also including Evergy subsidiaries Evergy Central , Prairie Wind, and Transource. This estimated SPP exit fee information is attached as **CONFIDENTIAL Attachment D**. The

Companies have indicated a desire that the Commission issue an order providing that the “interim and conditional” approval described in Section II.A(1) of the May 16, 2013 Stipulations be extended until September 30, 2024 and the dates for the associated 2021 Interim Period also be extended for an identical three-year period, to be identified as the 2024 Interim Period. This requested extension would result in the revised deadlines respecting the Stipulations as outlined on Attachment A to the instant filing. The Companies have also noted that under Section II.F(2) of the May 16, 2013 Stipulations, if the Commission does not issue an order to terminate or extend its interim approval prior to 24 months before the end of the existing 2018 Interim Period, the 2018 Interim Period shall automatically be extended under the same terms and conditions from year-to-year (“Extended Interim Period”) unless otherwise ordered by the Commission.

5. The requested three-year extension, if approved, will result in necessary revisions to the date-related references in Section II of the May 16, 2013 Stipulations. These date-related reference revisions, as described in **Attachment B**², will result in revisions to the following subsections of Section II of both of the May 16, 2013 Stipulations: II.A(1), II.A(2)(d), II.B(2)(a), II.E(1), II.E(2), II.E(4), II.F(2), II.G(1).

6. The Companies will contact and meet with the Parties should an event(s) or circumstance(s) occur in the SPP footprint that the Companies believe significantly affects the Companies’ position within SPP. Also, should a Party believe an event(s) or circumstance(s) has occurred in the SPP footprint that significantly affects the Companies’ position within SPP, a

² There are also several revisions described in Attachment B to correct case number and company reference errors in solely the KCP&L May 16, 2013 Stipulation. These revisions to case number and company related references, which are included in Subsections II.E(1) and II.G(10) of the KCP&L May 16, 2013 Stipulation, are unrelated to the instant extension request. The related references in the GMO May 16, 2013 Stipulation are correct and, thus, do not require revision.

Party may request the Companies to convene a meeting to discuss with the Parties whether the extension of the time to file the next case to June 30, 2023 remains reasonable.

7. The Companies and the Parties agree that the requested three-year extension is not detrimental to the public interest. (*See* Section 393.190.1 RSMo. 2016; 4 CSR 240-3.110).

8. Counsel for SPP has indicated that SPP does not object to the relief requested in the Joint Motion.

WHEREFORE, the Companies and the Parties request that the Commission issue an order as described above, and in Attachment A and Attachment B, hereto, which would (1) relieve the Companies of their obligations to file Pleadings regarding continued participation in a regional transmission organization or its operation under an independent coordinator of transmission no later than June 30, 2020; (2) extend the “interim and conditional” approval described in Section II.A(1) of the May 16, 2013 Stipulations until September 30, 2024, extend all associated Interim Period dates described in Section II (and subsections of Section II) of the May 16, 2013 Stipulations for an identical three-year period, and (3) designate the 2017 Interim Reports described in Section II of the May 16, 2013 Stipulations as 2023 Interim Reports with attendant activities and dates.

Respectfully submitted,

<p><i>/s/ Roger W. Steiner</i></p> <hr/> <p>Roger W. Steiner, MO #39586 Evergy, Inc. 1200 Main Street, 16th Floor Kansas City, MO 64105 Telephone: (816) 556-2314 Facsimile: (816) 556-2110 Email: Roger.Steiner@evergy.com</p> <p>Attorney for Evergy Missouri Metro and Evergy Missouri West</p>	<p><i>/s/ Nicole Mers</i></p> <hr/> <p>Nicole Mers Deputy Counsel Missouri Bar No. 66766 Attorney for the Staff of the Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65012 (573) 751-6651 (Telephone) (573) 751-9285 (Fax) Nicole.mers@psc.mo.gov</p> <p>Attorney for the Staff of the Missouri Public Service Commission</p>
<p><i>/s/ Nathan Williams</i></p> <hr/> <p>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</p> <p>Attorney for the Office of Public Counsel</p>	<p><i>/s/ Carl J. Lumley</i></p> <hr/> <p>Carl J. Lumley, MO #32869 130 S. Bemiston, Suite 200 Clayton, Missouri 63105 (314) 725-8788 (314) 725-8789 (Fax) Email: clumley@lawfirmemail.com</p> <p>Attorney for Dogwood Energy, LLC</p>

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all parties of record on this 30th day of June 2020.

/s/ Roger W. Steiner

Roger W. Steiner

ATTACHMENT A
Timeline of the 2024 Interim Period

	<u>Original Schedule</u>	<u>Prior Date</u>	<u>New Date</u>
End of Prior Interim Period: 2013 Interim Period	September 30, 2013	September 30, 2018 (End of 2018 Interim Period)	September 30, 2021
Scheduled Start of SPP Integrated Marketplace	March 1, 2014	Stays the same	Stays the same
Beginning of Period Subject to Benefit-Cost Study Stipulation and Agreement, Sec. II.E(1)	January 1, 2016	January 1, 2019	January 1, 2022
Preliminary Analysis Plan Provided to Staff and Public Counsel Stipulation and Agreement, Sec. II.E(1)	June 30, 2016	June 30, 2019	June 30, 2022
Finalize Analysis Plan after Consultation with Staff and Public Counsel Stipulation and Agreement, Sec. II.E(2)	September 30, 2016	September 30, 2019	September 30, 2022
2017 Interim Report Deadline Stipulation and Agreement, Sec. II.E(4)	June 30, 2017	June 30, 2020 (2020 Interim Report Deadline)	June 30, 2023
End of 2018 Interim Period Stipulation and Agreement, Sec. II.A(1), II.E(1), and II.E(4)	September 30, 2018	September 30, 2021 (End of 2021 Interim Period)	September 30, 2024

Attachment B

KCP&L EO-2012- 0135 Stipulation & Agreement Section	Section Title or Description	Change From:	Change To:	Proposed June 30, 2020 Change:
II.	STIPULATIONS			
II.A	INTERIM AND CONDITIONAL APPROVAL OF KCP&L'S PARTICIPATION IN SPP			
II.A(1)	Approval/Term	September 30, 2018 2018 Interim Period 2017 Interim Report	→ → → September 30, 2021 2021 Interim Period 2020 Interim Report	September 30, 2024 2024 Interim Period 2023 Interim Report
II.A(2)	Approval Provisions			
II.A(2)(a)	Service Agreement Provision		No Changes	No Changes
II.A(2)(b)	Transmission Costs and Revenues		No Changes	No Changes
II.A(2)(c)	Continued and Further Participation in SPP		No Changes	No Changes
II.A(2)(d)	SPP Geographic Scope Provision	2018 Interim Period	→ 2021 Interim Period	2023 Interim Period
II.A(2)(e)	Withdrawal from SPP		No Changes	No Changes
II.A(2)(f)	Joint Operating Agreements Provision		No Changes	No Changes
II.B	SERVICE AGREEMENT			
II.B(1)	Purpose of Service Agreement Relationship between the Service Agreement and FERC Determined Incentives		No Changes	No Changes
II.B(2)	Network Transmission Service under the SPP Open Access Transmission Tariff ("OATT")		No Changes	No Changes
II.B(2)(a)	SPP Administrative Charges	2018 Interim Period	→ 2021 Interim Period	2024 Interim Period
II.B(2)(b)	Charges Related to SPP Cost Allocation for Base Plan Transmission Upgrades		No Changes	No Changes

Attachment B

Attachment B				
KCP&L EO-2012- 0135 Stipulation & Agreement Section	Section Title or Description	Change From:	Change To:	Proposed June 30, 2020 Change:
II.B(2)(c)	Charges Related to SPP Cost Allocation for Economic Balanced Portfolio of Transmission Upgrades	No Changes		No Changes
II.B(2)(d)	Cost for Supplemental Upgrades	No Changes		No Changes
II.B(2)(e)	Costs and Revenues Related to the Operation of the SPP Power Markets	No Changes		No Changes
II.B(2)(f)	Charges for Ancillary Services	No Changes		No Changes
II.C	UNANTICIPATED FERC ACTIONS SUBSEQUENT TO APPROVAL BY THE COMMISSION	No Changes		No Changes
II.D	TRANSMISSION COSTS AND REVENUES			
II.D(1)	Securitizing KCP&L Transmission Revenues	No Changes		No Changes
II.D(2)	Costs and Revenues Related to an Affiliated Transmission Company	No Changes		No Changes
II.E	CONTINUED AND FURTHER PARTICIPATION IN SPP			
II.E(1)	Study of Benefits and Costs of RTO Participation	June 30, 2016 September 30, 2018 January 1, 2016 EO-2012-0136	→ → → →	June 30, 2019 September 30, 2021 January 1, 2019 EO-2012-0135
II.E(2)	Consultation with other Parties	September 30, 2016 2017 Interim Report	→ →	September 30, 2019 2020 Interim Report
				June 30, 2022 September 30, 2024 January 1, 2022 EO-2012-0135
				September 30, 2022 2023 Interim Report

Attachment B

Attachment B				
KCP&L EO-2012- 0135 Stipulation & Agreement Section	Section Title or Description	Change From:	Change To:	Proposed June 30, 2020 Change:
II.E(3)	Resolution of Conflicts Regarding the Study	No Changes		No Changes
II.E(4)	Filing with the Commission	June 30, 2017 2017 Interim Report September 30, 2018 2018 Interim Period	→ → → →	June 30, 2020 2020 Interim Report September 30, 2021 2021 Interim Period
II.F	WITHDRAWAL FROM SPP			
II.F(1)	Timeliness of Withdrawal from SPP	No Changes		No Changes
II.F(2)	Possible Extension of the Interim Period	2018 Interim Period	→	2021 Interim Period
II.F(3)	Possible Exit Obligations	No Changes		No Changes
II.F(4)	Possible Change in SPP Participation	No Changes		No Changes
II.G	EFFECT OF THIS NEGOTIATED SETTLEMENT (Following Subsections II.G(1) – II.G(11) Typically Found In Stipulation and Agreements Filed With The Commission)			
II.G(1)		2017 Interim Report	→	2020 Interim Report
II.G(2)		No Changes		No Changes
II.G(3)		No Changes		No Changes
II.G(4)		No Changes		No Changes
II.G(5)		No Changes		No Changes
II.G(6)		No Changes		No Changes
II.G(7)		No Changes		No Changes

Attachment B

Attachment B				
KCP&L EO-2012- 0135 Stipulation & Agreement Section	Section Title or Description	Change From:	Change To:	Proposed June 30, 2020 Change:
II.G(8)		No Changes		No Changes
II.G(9)		No Changes		No Changes
II.G(10)		Any filings and submittals required of KCP&L under the similar stipulation filed in File No. EO-2012-0135 and of KCP&L under this Stipulation may be made jointly.	→	Any filings and submittals required of GMO under the similar stipulation filed in File No. EO-2012-0136 and of KCP&L under this Stipulation may be made jointly.
II.G(11)		No Changes		No Changes
II.H	COMMISSION APPROVAL OF THE STIPULATION (Following Subsections II.H(1) – II.H(5) Typically Found In Stipulation and Agreements Filed With The Commission)			
II.H(1)		No Changes		No Changes
II.H(2)		No Changes		No Changes
II.H(3)		No Changes		No Changes
II.H(4)		No Changes		No Changes

Attachment B

Attachment B				
KCP&L EO-2012- 0135 Stipulation & Agreement Section	Section Title or Description	Change From:	Change To:	Proposed June 30, 2020 Change:
II.H(5)		No Changes		No Changes
II.I	MISCELLANEOUS			
II.I(1)	Counterparts	No Changes		No Changes
II.I(2)	Successors and Assigns	No Changes		No Changes
II.I(3)	Section and Subsection Captions	No Changes		No Changes
II.I(4)	Notices	No Changes		No Changes

Table 1: Load Ratio Share of Zones in SPP's Missouri Footprint

NAME OF THE ZONE ¹	LOAD RATIO SHARE IN SPP'S MISSOURI FOOTPRINT ²
Empire District Electric ("EDE") (Zone 4) ³	2.12%
Kansas City Power & Light Company ("KCP&L") (Zone 6) ⁴	4.15%
KCP&L Greater Missouri Operations Company ("GMO") (Zone 9) ⁵	3.85%
City Utilities of Springfield, Missouri ("CUS") (Zone 3) ⁶	1.34%
Southwestern Power Administration ("SPA") (Zone 10) ⁷	0.29%
Total Load Ratio Share of Missouri Load in Southwest Power Pool	11.75%

¹ Zone refers to the SPP transmission pricing Zone. The listed Zones are those contain at least some load in Missouri. The Zones are named for the primary Transmission Owner in the Zone, but may contain load from transmission customers that are unaffiliated with the primary Transmission Owner.

² Load Ratio Share percentages are based on load data from the July 2019 Revenue Requirements and Rates ("RRR") File posted to the SPP website on July 12, 2019 and have been adjusted to reflect only the Missouri portion of the load in the Zone.

³ The Missouri load in the EDE Zone is approximately 89% of the total load in the EDE Zone.

⁴ The Missouri load in the KCP&L Zone is approximately 55% of the total load in the KCP&L Zone. The Missouri load in the KCP&L Zone contains load for Evergy Metro and Independence Power & Light, as well as Associated Electric Cooperative Incorporated and Ameren Missouri (under grandfathered agreements).

⁵ The Missouri load in the GMO Zone is 100% of the total load in the GMO Zone.

⁶ The Missouri load in the CUS Zone is 100% of the total load in the CUS Zone.

⁷ The Missouri load in the SPA Zone is approximately 54% of the total load in the SPA Zone.

Table 2: Value of Transmission: Costs and Benefits for each Missouri Zone⁸

NAME OF THE ZONE	BENEFITS 40-YR NPV (\$ MILLIONS)	COST 40-YR NPV (\$ MILLIONS)	BENEFIT-TO-COST RATIO
Empire District Electric ("EDE") (Zone 4) (Missouri Load)	\$351.3	\$100.5	3.49
Kansas City Power & Light Company ("KCP&L") (Zone 6) (Missouri Load)	\$689.7	\$197.4	3.49
KCP&L Greater Missouri Operations Company ("GMO") (Zone 9) (Missouri Load)	\$639.2	\$182.9	3.49
City Utilities of Springfield, Missouri ("CUS") (Zone 3) (Missouri Load)	\$222.3	\$63.6	3.49
Southwestern Power Administration ("SPA") (Zone 10) (Missouri Load)	\$48.1	\$13.8	3.49
Total Missouri Benefits and Costs	\$1,950.5	\$558.1	3.49

⁸ The Value of Transmission Study estimated that for the entire SPP footprint that the net present value (NPV) of benefits over a forty-year timeframe was \$16.603 billion and the costs were \$4.751 billion, which is a 3.49 to 1 ratio.

Table 3: RCAR II: Costs and Benefits for each Missouri Zone¹¹

NAME OF THE ZONE	BENEFITS 40-YR NPV (\$ MILLIONS)	COST 40-YR NPV (\$ MILLIONS)	BENEFIT-TO-COST RATIO
Empire District Electric (“EDE”) (Zone 4) (Missouri Load)	\$84.6	\$104.1	0.81
Kansas City Power & Light Company (“KCP&L”) (Zone 6) (Missouri Load)	\$617.1	\$207.9	2.97
KCP&L Greater Missouri Operations Company (“GMO”) (Zone 9) (Missouri Load)	\$412.0	\$192.0	2.15
City Utilities of Springfield, Missouri (“CUS”) (Zone 3) ⁹ (Missouri Load)	\$79.2	\$71.0	1.12
Southwestern Power Administration (“SPA”) (Zone 10) (Missouri Load) ¹⁰	n/a	n/a	n/a
Total Missouri Benefits and Costs	\$1,192.8	\$575.0	2.07

⁹ The CUS Benefits and resulting B/C Ratio reflect the Indicative RCAR II Impact of ~\$38 million of additional Adjusted Production Cost (“APC”) benefits resulting from the Morgan Transformer Project (see SPP Markets and Operations Policy Committee (“MOPC”) April 2017 meeting agenda item 9d).

¹⁰ No benefits or costs were calculated for the SPA Zone in the RCAR II report.

¹¹ RCAR II estimated that for the entire SPP footprint that the 40- year NPV benefits were \$17.599 billion and the costs were \$7.180 billion, which is a 2.45 to 1 benefit/cost ratio.

Table 4: Integrated Marketplace: Costs and Benefits for each Missouri Zone¹²

NAME OF THE ZONE	ANNUAL SAVINGS (\$ MILLIONS)
Empire District Electric (“EDE”) (Zone 4) <i>(Missouri Load)</i>	\$12.1
Kansas City Power & Light Company (“KCP&L”) (Zone 6) <i>(Missouri Load)</i>	\$23.7
KCP&L Greater Missouri Operations Company (“GMO”) (Zone 9) <i>(Missouri Load)</i>	\$21.9
City Utilities of Springfield, Missouri (“CUS”) (Zone 3) <i>(Missouri Load)</i>	\$7.6
Southwestern Power Administration (“SPA”) (Zone 10) <i>(Missouri Load)</i>	\$1.7
Total Missouri Annual Savings	\$67.0

¹² The Integrated Marketplace study estimated that SPP members average \$570 million in annual savings.

**ATTACHMENT D
CONTAINS CONFIDENTIAL
INFORMATION
NOT AVAILABLE TO THE PUBLIC.**

ORIGINAL FILED UNDER SEAL.