BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro for Authority 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-2022-0025 Tariff No. JE-2022-0024

EVERGY MISSOURI METRO RESPONSE TO PUBLIC COUNSEL'S RESPONSE TO INTERIM TARIFF

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("Evergy Missouri Metro" or the "Company"), by and through counsel, and for their *Reply* ("Reply") to the Office of the Public Counsel's ("OPC") for the *Response to Interim Tariff* ("Response") dated October 5, 2021, states as follows:

1. In the Commission's Order issued on September 15, 2021, *Order Rejecting Tariff* to Change Fuel Adjustment Rates, the Commission indicated that the parties should determine if there is any part of the proposed adjustment not now in question that could be included in an interim FAC tariff revision.

2. After further discussions, Evergy, Staff and OPC agreed that the rates filed by Evergy on September 30, 2021 represent the undisputed amount that should go into effect. The undisputed amount represents a credit to customers that will lower the rates for the customers once the interim rates become effective. These are the same rates that were originally filed by Evergy on July 30, 2021.

3. As explained in Evergy's cover letter accompanying its September 30, 2021, revised tariff filing, the only disputed amounts in question are the extraordinary revenues from Winter Storm Uri that Evergy Missouri Metro had excluded from its proposed Fuel Adjustment Rate ("FAR") filing on July 30. Those revenues are now subject to dispute, and the question of

whether extraordinary revenues from Winter Storm Uri may be deferred into the future will be determined by the Commission in this FAC proceeding, or alternatively <u>In the Matter of the Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for an Accounting Authority Order Allowing the Companies to Record and Preserve Costs Related to the February 2021 Cold Weather Event, File No. EU-2021-0283. Evergy believes it would be more administratively efficient for the Commission to resolve this issue along with all other issues related to the deferral of costs and revenues related to the Winter Storm Uri event in File No. EU-2021-0283. However, it will proceed forward in this current FAC file, as directed by the Commission.</u>

4. In its Response filed October 5, 2021, OPC does not oppose the rates in Evergy Missouri Metro's interim tariff filing (Tariff No. JE-2022-0066) becoming effective. However, OPC seems concerned that the revised interim tariff sheet indicates that it will be effective from customer usage beginning November 1, 2021 (i.e. effective date of new interim tariff) and through March 31, 2022.

5. In order to allow the undisputed credits that are due customers to begin being returned to customers and give the Commission a reasonable opportunity to review the revised interim tariff (i.e. 6th Revised Sheet No. 50.31), Evergy Missouri Metro and Staff have agreed that the current effective tariff rates (5th Revised Sheet No. 50.31) that went into effect on April 1, 2021, will remain in effect for an additional month through October 31, 2021. Any needed adjustments necessary as a result of the extension of the current effective tariff rates by one month will be made in the true-up related to the FAC tariffs.

6. OPC's recommendation in their Response is not needed as no changes to the tariff

are needed for it to go into effect, and any adjustment needed as a result of the one-month delay in

the effective date of the interim tariffs will be addressed in the true-up.

WHEREFORE, Evergy Missouri Metro submits its Reply to the Commission.

Respectfully submitted,

|s| Roger W. Steiner

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ATTORNEYS FOR EVERGY MISSOURI METRO

CERTIFICATE OF SERVICE

I hereby certify that a true and copy of the foregoing application was emailed on this 12th

day of October 2021, to counsel of record.

<u>|s| Roger W. Steiner</u>

Roger W. Steiner