

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

In the Matter of Evergy Metro, Inc. d/b/a Evergy)
Missouri Metro’s Request for Authority to) Case No. ER-2022-0129
Implement A General Rate Increase for Electric)
Service)

In the Matter of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West’s Request for Authority to) Case No. ER-2022-0130
Implement A General Rate Increase for Electric)
Service)

**EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST
RESPONSE TO STATEMENTS OF DISCOVERY DISAGREEMENTS
AND CONCERNS FILED BY OPC AND STAFF**

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“EMM”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“EMW”) (collectively, the “Evergy” or “Company”), by and through their counsel and, for their response to the Office of the Public Counsel’s (“OPC”) *Statement of Discovery Dispute/Concern* (“OPC Statement”) and the *Staff Statement of Discovery Disagreements and Concerns* (“Staff Statement”) filed by OPC and Staff (“Staff”) for the Missouri Public Service Commission (“Commission”) on May 2, 2022, state as follows:

RESPONSE TO OPC STATEMENT

1. Due to the confidential nature of the OPC’s request, the Company will address the issues raised at the discovery conference.

RESPONSE TO STAFF STATEMENT

2. None of the data requests listed by Staff are overdue. The Company will not respond to every data request listed by Staff in this Response but only those that require explanation. For the remainder of the data requests, the preparation of responses is in progress. The Company intends to submit responses to these data requests as soon as they are available.

3. Data requests 113, 115 and 116 (both cases) request updates as of March 31, 2022 to Quarterly Financial Statements, Capital Components and Cost of Capital. The Company cannot update these data responses until its books are closed. The Company intends to provide updated data request responses after the Q1 information is filed with the U.S. Securities and Exchange Commission on May 4, 2022.

4. The Company responded to data request 247.2 and 250.2 in a timely manner. The data request asked for weather normalized revenue information for a period outside the test year. The Company has not undertaken the analysis to prepare weather normalized sales information outside the test year and therefore it has nothing to provide in response to Staff's question. The Company's data request responses did provide information so that Staff can perform the outside the test year analysis should Staff wish to do so.

5. Data request 355 (0129) was responded to in a timely manner. The working excel spreadsheet requested in the data request was provided. Similarly, data request 016 (0130) was answered in a timely manner.

6. The responses to data requests 115 and 116 (both cases) were timely filed as Confidential. The Company has reviewed the responses and will redesignate all of the 115 response and the majority of the 116 response as public.

WHEREFORE, EMM and EMW respectfully submit their Response to the OPC Statement and Staff Statement to the Commission.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorneys for Evergy Missouri Metro and
Evergy Missouri West**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served upon counsel for all parties on this 5th day of May 2022, by either e-mail or U.S. Mail, postage prepaid.

/s/ Roger W. Steiner

Roger W. Steiner