

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the Third Prudence Review )  
Of Costs Subject to the Commission-Approved ) File No. EO-2020-0262  
Fuel Adjustment Clause of Evergy Missouri West )  
Inc., d/b/a Evergy Missouri West )

In the Matter of the Third Prudence Review )  
Of Costs Subject to the Commission-Approved ) File No. EO-2020-0263  
Fuel Adjustment Clause of Evergy Metro, Inc., )  
d/b/a Evergy Missouri Metro )

**POSITION STATEMENT OF SIERRA CLUB**

1. Was Evergy imprudent by virtue of the assumptions it included in the integrated resource planning process?

2. Was the decision by Evergy to include capacity sales in its assumptions for its IRP imprudent?

3. Was it imprudent for Evergy to not include FAC cost reductions arising from capacity sale contracts in its FAC rate calculations as modeled in its IRP?

4. Was Evergy imprudent in the management of its demand response programs?

5. Was it imprudent for Evergy to not call additional demand response events in a manner that would have reduced FAC costs?

6. If it was imprudent for Evergy to not call additional demand response events in a manner that would have reduced FAC costs, is it more appropriate to address the imprudent implementation of the programs through an ordered FAC adjustment or an ordered DSIM adjustment?

**Sierra Club takes no position on issues 1–6.**

7. Evergy's Self Scheduling Practices.

**Sierra Club asks the Commission to find on issue 7 according to the Unanimous Partial Stipulation and Agreement filed on January 15, 2021.**

Respectfully submitted,

/s/ Henry B. Robertson

Henry B. Robertson (Mo. Bar No. 29502)

Great Rivers Environmental Law Center

319 N. Fourth Street, Suite 800

St. Louis, Missouri 63102

Tel. (314) 231-4181

Fax (314) 231-4184

hrobertson@greatriverslaw.org

Attorney for Sierra Club

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 21st day of January, 2021, to all counsel of record.

/s/ Henry B. Robertson

Henry B. Robertson