

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

In the Matter of Requests for Customer Account)
Data Production) Case No. EO-2024-0002

**EVERGY’S REPLY TO THE STAFF’S OBJECTION
TO AMEREN MISSOURI’S MOTION TO INTERVENE**

COME 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”), by and through their counsel and, for their *Reply to the Staff’s Objection to Ameren Missouri’s Motion To Intervene* states as follows:

1. On June 30, 2023, Evergy filed its *Motion To Establish Docket* (“Motion”), pursuant to a *Stipulation and Agreement* filed by Evergy, Staff (“Staff”) of the Missouri Public Service Commission (“Commission”), the Office of the Public Counsel (“OPC”) and other parties in its last rate case.

2. On July 6, 2023, the Commission issued its *Order Directing Notice, Setting Deadline for Intervention Requests, and Setting Prehearing Conference* (“Order”) The Order established July 27, 2023 as the deadline for interested parties to file their applications to intervene.

In its Order, the Commission stated:

The Company’s Motion also noted a similar request made by Staff to Union Electric Company d/b/a Ameren Missouri. The Motion indicated that Ameren Missouri was consulted and intends to participate in the above captioned file.

The Company’s Motion also noted the interest and intended participation of The Empire District Electric Company d/b/a Liberty.

3. On July 7, 2023, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed its *Application to Intervene* in this proceeding which conformed to the

requirements of 20 CSR 4240-2.075. Ameren Missouri explained that it has an interest in this case to efficiently address data availability issues. More specifically, Ameren Missouri confirmed Evergy's assertion in its Motion that on June 14, 2023, the Commission issued its *Report and Order* in ER-2022-0337, which ordered that Ameren Missouri prepare a study of customer specific information by account, rate schedule and voltage by its next rate case.

4. On July 12, 2023, the Staff filed its Objection to Ameren Missouri's Application to Intervene ("Objection"). In its Objection, Staff acknowledged that "The Commission, in its discretion, may allow Ameren Missouri to intervene if doing so would serve the public interest." (Objection, p. 6). Staff did not assert that granting Ameren Missouri's application would not serve the public interest. Nor did Staff deny the data requested from Evergy and Ameren Missouri is similar, and that it would be more efficient to address these data availability issues in this docket. Instead, Staff makes an assertion that it would somehow be "surrendering its procedural progress it has made with Evergy to date by including Ameren Missouri in this particular Evergy matter." (Objection, p. 6) The Commission should reject this Staff assertion. At this juncture in the proceeding, there have been no discussions about the procedures and/or schedule to be used in this case. The procedures and schedule that will be used in this proceeding will be determined following the prehearing conference that the Commission has scheduled for August 8, 2023.

5. Given the similar nature of the data being requested by Staff from Evergy, Ameren Missouri, and presumably The Empire District Electric Company d/b/a Liberty in the future, it will promote administrative economy, and preserve the scarce resources of the Commission, Staff, Public Counsel other interested parties if all the affected regulated electric companies are allowed to participate in this proceeding.

WHEREFORE, Evergy respectfully requests the Commission issue an order granting the application to intervene filed by Ameren Missouri filed on July 12, 2023.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorneys for Evergy Missouri Metro and Evergy
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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 21st day of July 2022, by either e-mail or U.S. Mail, postage prepaid.

/s/ Roger W. Steiner

Roger W. Steiner