

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

In the Matter of the Establishment of a Working Case for the Review and Consideration of Rewriting and Writing of Existing and New Affiliate Transaction Rules and HVAC Affiliate Transaction Rules.)))))) File No. AW-2018-0394

**EVERGY’S RESPONSE TO ORDER
REQUESTING ADDITIONAL RESPONSES**

COMES NOW Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (collectively, “Evergy” or “Company”), and as requested by the Commission’s November 7, 2019 *Order Requesting Additional Responses*, provides the following comments on the draft rule submitted in this workshop docket by the Staff on September 9, 2019:

1. The Company appreciates the opportunity to respond to the draft rule which has been submitted by the Missouri Commission Staff (“Staff”) after receiving previous input from stakeholders through filed comments and workshop discussions. This updated draft rule strikes an appropriate balance in providing intended protections from subsidization and preserving the original intent of the Affiliate Transactions Rule, while also improving the ability for companies to operate and work with their affiliates by limiting onerous and unnecessary restrictions.

2. 20 CSR 4240-10.XXX(1)(E) – Definition of “Corporate Support”. The Company suggests adding five common major areas to the non-exclusive list: supply chain, legal services, regulatory affairs, facilities management and security.

3. 20 CSR 4240-10.XXX(5)(B). The Company suggests the first sentence be modified to add the following language at the end of the sentence: “or in a separate filing no later than two years after the effective date of this rule.” The first sentence of (5)(B) would now read:

(B) Each covered utility shall file a CAM for approval by the commission as part of its first general rate case after the effective

date of this rule or in a separate filing no later than two years after the effective date of this rule.

This additional language will give the utility flexibility and potentially simplify issues to be addressed during a rate case.

Respectfully submitted,

/s/ Roger W. Steiner

Robert J. Hack, MBN 36496
Roger W. Steiner, MBN 39586
Evergy, Inc.
1200 Main Street, 16th Floor
Kansas City, MO 64105
Telephone: (816) 556-2791
Telephone: (810) 556-2314
Facsimile: (816) 556-2110
E-Mail: Rob.Hack@evergy.com
E-Mail: Roger.Steiner@evergy.com

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

Dated: December 9, 2019

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 9th day of December 2019.

/s/ Robert J. Hack

Robert J. Hack