

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

In the Matter of a Working Case to Explore)
Emerging Issues in Utility Regulation) Case No. EW-2017-0245

**EVERGY MISSOURI METRO’S AND EVERGY MISSOURI WEST’S
COMMENTS ON FOURTH DRAFT RULE**

COMES NOW Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy MO Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy MO West”) (collectively, “Evergy” or “the Company”) and hereby submits its comments on the fourth draft rule (20 C.S.R. 4240-22.055) proposed by Staff (“Staff”) of the Missouri Public Service Commission (“Commission”) on January 15, 2020. For its comments, the Company states as follows:

1. The Company appreciates that Staff incorporated much of the feedback received in comments responsive to the third draft prepared by Staff. The Company has additional comments on the Staff’s fourth draft, as follows:

- Subsection (2)(A)1: Delete “as further summarized by areas of low, medium, and high penetration.” It is unclear how the Company would determine what “low, medium, and high” is and, even if it were clear, it is unnecessary for the Company to categorize the penetration; information users will be able to readily identify what distributed generation and storage is on the system, and where it is located.
- Subsection (4)(C): Insert “using the total resource cost test, and any additional tests the utility deems relevant,” as suggested in the Utilities’ November 1, 2019 comments in order to remain consistent with MEEIA rules.

2. With respect to the cost of compliance with the proposed rule should it ultimately be adopted, the Company anticipates costs associated with performing a Distributed Energy Resource (“DER”) Adoption Potential Study (estimating \$200,000+ for each triennial filing,

increasing over time as DER becomes more prevalent), as well as the cost of a full-time engineer for specific, incremental analysis that would be required as a result of the proposed rule.

WHEREFORE, the Company request the Commission accept its comments on Staff's fourth draft rule.

Respectfully submitted,

/s/ Roger W. Steiner

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand delivered, emailed or mailed, postage prepaid, this 14th day of February 2020, to all counsel of record.

/s/ Roger W. Steiner

**Counsel for Evergy Missouri Metro and Evergy
Missouri West**