

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

In the Matter of Evergy Metro, Inc. d/b/a)	
Evergy Missouri Metro’s 2023 Integrated)	<u>Case No. EO-2023-0212</u>
Resource Plan Annual Update Filing)	
)	

THE OFFICE OF THE PUBLIC COUNSEL’S COMMENTS

COMES NOW the Office of the Public Counsel and, by the extended August 31, 2023, filing date the Commission ordered for comments on Evergy Missouri Metro’s 2023 Integrated Resource Plan Annual Update Filing, provides its comments in the attached verified memorandum of Public Counsel employees Lena Mantle, P.E., and Jordan Seaver, Policy Analyst. They point out that:

- 1) Evergy Missouri Metro plans to rely excessively on the Southwest Power Pool energy and capacity markets thereby exposing its retail customers to potential extreme costs¹;
- 2) It is unclear how Evergy Missouri Metro is planning for the addition of Schedule MKT customers; and
- 3) Evergy Missouri Metro’s projected baseline customer energy usage and demand growth are essentially flat, its demand-side management and demand response programs extremely costly with little impact—impact likely to occur without them; therefore, imposing the costs of those programs on Evergy Missouri Metro’s customers is not justified.

¹ For example, costs Evergy Missouri West and Liberty incurred due to Storm Uri.

Respectfully,

/s/ Nathan Williams

Nathan Williams
Chief Deputy Public Counsel
Missouri Bar No. 35512

Office of the Public Counsel
Post Office Box 2230
Jefferson City, MO 65102
(573) 526-4975 (Voice)
(573) 751-5562 (FAX)
Nathan.Williams@opc.mo.gov

Attorney for the Office
of the Public Counsel

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 31st day of August 2023.

/s/ Nathan Williams