

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

In the Matter of the Eleventh) Prudence Review of Costs Subject to) the Commission-Approved Fuel) Adjustment Clause of Evergy Missouri) West, Inc. d/b/a Evergy Missouri West)	Case No. EO-2023-0277
---	-----------------------

RESPONSE TO STAFF RECOMMENDATION AND REQUEST FOR HEARING

COMES NOW the Office of the Public Counsel (“OPC”) and for its *Response to Staff Recommendation and Request for Hearing*, states as follows:

1. On August 30, 2023, the Staff of the Public Service Commission (“Staff”) filed its *Eleventh Prudence Review Report* in the above styled case.
2. According to that *Eleventh Prudence Review Report*, Staff found evidence of imprudence by Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy West” or “Company”).
3. After reviewing the Staff’s *Eleventh Prudence Review Report*, the OPC generally agrees with the conclusions drawn.
4. However, the OPC believes Staff has overlooked additional issues of imprudence that have resulted in substantial harm to Evergy West’s customers.
5. Specifically, Staff’s review does not appear to have considered the impact of Evergy West’s resource planning process on fuel and power costs incurred in the prudence review period of June 1, 2021 through November 30, 2022.

6. Evergy West has imprudently neglected to ensure adequate generating resources to meet the energy requirements imposed by its customers and, as a result, has incurred unnecessarily high purchased power costs.

7. The OPC estimates that prudent management of Evergy West's resource planning would have reduced the Company's net energy costs by \$164,624,505.¹

8. However, the OPC acknowledges that prudent management of Evergy West's resource planning would have resulted in increased capital costs borne by Evergy West's customers of approximately \$78,248,211.²

9. Therefore, the OPC recommends the Commission disallow the difference between the excess net energy costs and the increased capital costs, which is \$86,376,294.

10. In support of the values included in this motion, the OPC has included as Attachment A the workpaper of OPC Senior Analyst Lena M. Mantle, P.E.

11. Pursuant to Commission Rule 20 CSR 4240-20.090(11)B, the OPC hereby requests a hearing regarding the *Eleventh Prudence Review Report* filed by the Commission's Staff in the above filed case for the reasons outlined herein.

¹ This number reflects the reduction to Evergy West's net energy cost that would have resulted if Evergy West and its sister utility, Evergy Metro, Inc., operated as a combined entity in a manner consistent with how their resource planning has been conducted.

² This number reflects the increase in Evergy West's revenue requirement that would have resulted if Evergy West and Evergy Metro, Inc. operated as a combined entity in a manner consistent with how their resource planning has been conducted.

WHEREFORE, the Office of the Public Counsel respectfully requests the Commission order an evidentiary hearing in the above styled case and set a prehearing conference so that the parties can develop a recommended procedural schedule for this case.

Respectfully submitted,

By: /s/ John Clizer
John Clizer (#69043)
Senior Counsel
Missouri Office of the Public
Counsel
P.O. Box 2230
Jefferson City, MO 65102
Telephone: (573) 751-5324
Facsimile: (573) 751-5562
E-mail: john.clizer@opc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this eleventh day of September, 2023.

 /s/ John Clizer