

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

Timothy Allegri,)	
)	
Complainant,)	
v.)	File No. EC-2024-0015
)	
Evergy Metro, Inc. d/b/a Evergy Missouri Metro)	
And Evergy Missouri West, Inc. d/b/a Evergy)	
Missouri West,)	
)	
Respondent.)	

MOTION TO CONSOLIDATE

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) (collectively, the “Company” or “Evergy”), by and through its counsel and, for its *Motion to Consolidate Cases* (“Motion”), states as follows:

PROCEDURAL HISTORY

1. On August 1, 2023, Timothy Allegri (“Mr. Allegri”) corrected a deficiency and filed a complaint (“Allegri Complaint”) with the Missouri Public Service Commission (“Commission”).
2. On August 15, 2023, Mr. Allegri filed an amendment (“Amendment”) to his complaint requesting that the Commission add twenty-six self-represented co-complainants to the Allegri Complaint.
3. Pursuant to the Commission’s August 2, 2023 *Order Giving Notice of Complaint, Directing and Answer and A Staff Investigation* (“Order”), the Company submitted its *Answer, Affirmative Defenses, and Motion to Dismiss of Evergy Missouri Metro and Evergy Missouri West* (“Allegri Answer”) on August 30, 2023.

4. On September 6, 2023, the Commission issued its *Order Denying Motion to Add Additional Complainants and Denying Mediation Request*.

5. On September 11, 2023, the following complainants filed complaints against Evergy Missouri West with the Commission:

- EC-2024-0062 Betty Beyers
- EC-2024-0063 David A. Handley
- EC-2024-0064 Denise Allegri
- EC-2024-0065 Charles E. Bracken
- EC-2024-0066 Jesse L. Green, Jr.
- EC-2024-0067 Kendra B. Butner
- EC-2024-0068 Letha Sue Boland
- EC-2024-0069 Susan G. Bracken
- EC-2024-0070 Victor Butner
- EC-2024-0071 Marjorie J. Dyer

6. On September 12, 2023, the following complainants filed complaints against Evergy Missouri West with the Commission:

- EC-2024-0072 Barbara A. Rasa
- EC-2024-0073 Bethann C. Hill
- EC-2024-0074 Candace K. Robertson
- EC-2024-0075 Donald W. Rasa
- EC-2024-0076 Dwayne Marsh
- EC-2024-0077 Norman Howard
- EC-2024-0078 Rebekah L. Marsh
- EC-2024-0079 Scott Rasa
- EC-2024-0080 Stephen L. Robertson
- EC-2024-0081 Teresa Howard
- EC-2024-0082 Bart D. Wyatt
- EC-2024-0083 Carl J. Wouden
- EC-2024-0084 Cheryl K. Wouden
- EC-2024-0085 Dorothy J. Bell
- EC-2024-0086 Steven J. Bell
- EC-2024-0087 Amy Wolfe
- EC-2024-0088 Glen Wolfe
- EC-2024-0089 Mark A. Hill
- EC-2024-0090 Steven A. Dyer
- EC-2024-0091 Walter L. Dyer

7. On September 18, 2023, the following complainants filed complaints against Evergy Missouri West with the Commission:

EC-2024-0093 Aaron Collett
EC-2024-0094 Collette Collett
EC-2024-0095 Chad Krummel
EC-2024-0096 Jessica Krummel
EC-2024-0097 Cheryl Hedden

MOTION TO CONSOLIDATE CASES

8. In each instance, all complainants identified in Paragraphs 1 through 7 above (collectively, the “Complainants”) filed nearly identical complaints (collectively, the “Complaints”).¹

9. In many instances, separate (but nearly identical) complaints appear to have been filed by spouses and/or relatives with the same last name and address.

10. Accordingly, there are common questions of law and fact in the above-referenced cases and the consolidation of the Complaint Cases would be administratively expedient in that it would simplify the filings to be made by all parties to these matters.

11. The Commission issued *Order[s] Giving Notice of Complaint, Directing Answer and Directing Staff Investigation* on September 13, 2023 for Dockets 0062 thru 0091 (“1st Order”) with identical deadlines for Evergy’s answers² and Commission Staff’s (“Staff”) report³ in the relevant dockets as detailed above.

12. Additionally, the Commission issued *Order[s] Giving Notice of Complaint, Directing Answer and Directing Staff Investigation* on September 19, 2023 for Dockets 0093 thru 0097 (“2nd Order”) with identical deadlines for Evergy’s answers⁴ and Commission Staff’s (“Staff”) report⁵ in the relevant dockets as detailed above.

¹ With the exception of the unique addresses listed in Paragraph 1 of each complaint, both the attachment included with each of the Complaints and the separate Attachment A are identical.

² October 13, 2023.

³ October 30, 2023.

⁴ October 19, 2023.

⁵ November 6, 2023.

13. Commission Rule 20 CSR 4240-2.110(3) allows the Commission to consolidate pending actions involving related questions of law or fact.

WHEREFORE, the Company requests that the Commission issue an order consolidating the Complaint Cases with Case No. EC-2024-0015 being the lead case.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorney for Evergy Missouri Metro and Evergy
Missouri West**

CERTIFICATE OF SERVICE

A copy of the foregoing has been served this 21st day of September 2023 upon counsel for all parties of record in this proceeding via electronic service or U.S. mail postage prepaid.

/s/ Roger W. Steiner

Roger W. Steiner