# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Timothy Allegri, et al.	)	
Complainants,	)	
v.	)	File No. EC-2024-0015, et al.
	)	[consolidated]
Evergy Missouri West, Inc. d/b/a Evergy	)	
Missouri West,	)	
	)	
Respondent.	)	

#### ANSWER OF EVERGY MISSOURI WEST TO CONSOLIDATED COMPLAINTS

COMES NOW, Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("EMW"), by and through its counsel, and hereby submits its *Answer to Consolidated Complaints* ("Consolidated Answer") to the Complaints<sup>1</sup> (collectively, the "Complainants") consolidated by the Missouri Public Service Commission's ("Commission") *Order Consolidating Files and Dismissing Party* ("Consolidation Order") issued on October 3, 2023.

#### **ANSWER TO CONSOLIDATED COMPLAINTS**

- 1. EMW hereby incorporates its *Answer, Affirmative Defenses, and Motion to Dismiss* ("Answer") filed on August 30, 2023 in File No. EC-2024-0015.
- 2. Except as specifically admitted in its Answer, EMW denies, or is without sufficient knowledge to admit or deny, each and every allegation and statement in the Complaints and all

<sup>&</sup>lt;sup>1</sup> See, Consolidation Order, p. 3, Ordering ¶1.

related attachments that may be materially different from or tangentially related to those previously responded to in its Answer.<sup>2</sup>

WHEREFORE, EMW respectfully submits for Commission consideration this Consolidated Answer to the Complaints and again moves the Commission for an order dismissing the Complaints with prejudice for failure to state a claim upon which relief can be granted, as detailed in both its Answer and Consolidated Answer, and for any such further relief the Commission deems appropriate.

Respectfully submitted,

### |s| Roger W. Steiner

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**Attorneys for Evergy Missouri West** 

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<sup>&</sup>lt;sup>2</sup> This Consolidated Answer is submitted in response to the Complaints and pursuant to the Commission's *Order[s] Giving Notice of Complaint, Directing Answer and Directing Staff Investigation* issued on September 13, 2023 for File Nos. EC-2024-0062 thru EC-2024-0091; *Order[s] Giving Notice of Complaint, Directing Answer and Directing Staff Investigation* issued on September 19, 2023 for File Nos. EC-2024-0093 thru EC-2024-0097; and *Order[s] Giving Notice of Complaint, Directing Answer and Directing Staff Investigation* issued on September 29, 2023 for File Nos. EC-2024-0114 and EC-2024-0115.

## **CERTIFICATE OF SERVICE**

A copy of the foregoing has been served this 13<sup>th</sup> day of October 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