

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

In the Matter of Requests from Evergy Metro,)
Inc. d/b/a Evergy Missouri Metro and Evergy)
Missouri West, Inc. d/b/a Evergy Missouri West)
for Customer Account Data Production) **File No. EO-2024-0002**

MOTION FOR DISCOVERY CONFERENCE

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by counsel, and in support of its Motion for Discovery Conference states as follows:

1. On October 5, 2023, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (EMM) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (EMW) (collectively, “Evergy”), on behalf of the parties, filed a *Joint Proposed Procedural Schedule* the above-captioned case.

2. On October 18, 2023, the Commission entered an *Order Setting Procedural Schedule*, and established a procedural schedule in the above-captioned case.

3. As part of its October 18, 2023 *Order*, several procedures were established, including discovery dispute resolution procedures. Specifically, it states, in paragraph 3.E.(1) that “A party with an unresolved discovery dispute may file a motion to request a discovery conference.”

4. Between November 2, 2023, and November 14, 2023, Staff served over 170 Data Requests (DRs) upon Evergy. To date, Evergy responded to some of the DRs, but has not responded to the majority of the DRs.

5. On November 7, November 9, and November 14, 2023, Evergy served letters objecting to DRs 1 through 6, 7 through 147, and 148 through 174, respectively, upon Staff. Each of those letters raised general, blanket objections to all of

the DRs propounded upon Evergy, rather than specific objections directed at any specific DR. Evergy also requested an extension of time within which to answer the DRs.

6. Staff hereby request a discovery conference to be scheduled on Tuesday, November 21, 2023, as allowed by and outlined in the October 18, 2023 *Order Setting Procedural Schedule* so that the parties can discuss and resolve the issues surrounding the objections made by Evergy to Staff's DRs that remain unanswered and unresolved.

7. Staff has conferred with Evergy, and it is not opposed to the granting of this *Motion*.

8. This Motion is made in the interest of justice and without the intent to unreasonably delay or hinder these proceedings in any manner.

WHEREFORE, Staff requests the Commission to set a discovery conference on Tuesday, November 21, 2023, as outlined above, and order the parties to comply with it.

Respectfully submitted,

/s/ Carolyn H. Kerr

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Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, on this 16th day of November, 2023, to all counsel of record.

/s/ Carolyn H. Kerr