

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

In the Matter of the Establishment of a Working)
Case Regarding FERC Order 2222 Regarding)
Participation of Distributed Energy Resource) File No. EW-2021-0267
Aggregators in Markets Operated by Regional)
Transmission Organizations and Independent)
System Operators.)

RESPONSE TO EVERGY’S MOTION FOR CLARIFICATION

COMES NOW, Voltus, Inc. (“Voltus”), by and through counsel, and respectfully files this *Response to Evergy’s Motion for Clarification* (“Response”). In support of its Response, Voltus states as follows:

1. On October 12, 2023, the Missouri Public Service Commission (“Commission”) issued its *Order Partially Modifying the Commission’s 2010 Order Regarding ARCs* (“Order”).

2. On November 7, 2023, Evergy Missouri Metro, Inc. *d/b/a* Evergy Missouri Metro and Evergy Missouri West, Inc. *d/b/a* Evergy Missouri West (collectively, “Evergy”) filed a *Motion for Clarification* (“Evergy’s Motion”) on a variety of issues. Among other points of clarification, Evergy sought to clarify the following:

- e. Does the Order allow for the continuation of Evergy’s Market Based Demand Response tariff (“MBDR”) that allows for customers who participate in the retail Business Demand Response (“BDR”) tariff program to also bid into the wholesale market for energy and ancillary services?

- f. Does the Order allow for movement between retail and wholesale demand response programs at any time or is there only specific times or terms of either intended?¹
3. On November 13, 2023, the Commission issued an *Order Setting Time for Responses*, in which the Commission set a deadline of November 27, 2023 for interested stakeholders to respond to Evergy’s Motion.
4. Given the timeline set by the Commission for stakeholder responses to Evergy’s Motion, Voltus files this response and concurs with Evergy that clarification on the points raised in paragraph 2 above would be helpful to Voltus’ understanding and application of the Commission’s Order.

WHEREFORE, Voltus respectfully submits this Response to Evergy’s Motion requesting clarification on the items listed in Paragraph 2 above.

Respectfully submitted,

/s/ Anne E. Callenbach

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ATTORNEYS FOR VOLTUS, INC.

¹ File No. EW-2021-0267, *Motion for Clarification*, ¶ 8 (Nov. 7, 2023). Note, for ease of cross-reference and brevity, Voltus uses the same numbering (*i.e.*, “e” and “f”) as it appears in Evergy’s Motion.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served upon the parties listed on the official service list by email, this 27th day of November 2023.

/s/ Anne E. Callenbach