

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

In the Matter of the Application of Evergy)	
Missouri West, Inc. d/b/a Evergy Missouri)	<u>File No. EF-2022-0155</u>
West for a Financing Order Authorizing the)	Tariff Tracking No. JE-2024-0112
Financing of Extraordinary Storm Costs)	Tariff Tracking No. JE-2024-0114
Through an Issuance of Securitized Utility)	
Tariff Bonds)	

STAFF COMPLIANCE TARIFF RECOMMENDATION

COMES NOW Staff of the Missouri Public Service Commission, and for its Compliance Tariff Recommendation (“Recommendation”) ordered in the *Order Directing Staff to Submit Ducera Report and Staff Recommendation* (“Order”) issued by the Commission by delegation of authority on February 13, 2024, respectfully states as follows:

1. The Order directed, in part, that “No later than close of business on the second [business] day after submission of the IAL, Staff must provide the Commission with Ducera’s opinion on the Securitized Utility Tariff Bond issuance as well as pleadings containing a brief statement of Staff’s opinion and any concerns Staff has with the final terms of the Securitized Utility Tariff Bonds and **Staff’s recommendation about Evergy Missouri West’s compliance tariff.**” (emphasis added) [the IAL and the Ducera letter are addressed in a separate pleading filed herein by Staff]

2. Evergy Missouri West filed two of the compliance tariff sheets referenced in the Order on February 15, 2024, with a requested effective date of February 23, 2024, which were assigned Tariff Tracking File No. JE-2024-0112.¹ Evergy Missouri West filed a third compliance tariff sheet referenced in the Order on February 16, 2024, with a

¹ **EVERGY MISSOURI WEST, INC. d/b/a EVERGY MISSOURI WEST, P.S.C. MO No. 1**, 1st Revised Sheet No. 168.2 Canceling Original Sheet No. 168.2 and 1st Revised Sheet No. 168.5 Canceling Original Sheet No. 168.5

requested effective date of February 26, 2024, which was assigned Tariff Tracking File No. JE-2024-0114.²

3. Staff has reviewed the tariff sheets³ filed by Evergy Missouri West in Tariff Tracking File Nos. JE-2024-0112 and JE-2024-0114, and has determined that they are in substantial compliance with the Commission's *Amended Report and Order* issued November 17, 2022 (the "Financing Order") as the same may have been corrected by written order, and accordingly recommends that the Commission allow said tariff sheets to go into effect by operation of law as requested by Evergy Missouri West.

4. For purposes of this Recommendation, the information used in preparing this Recommendation may have been obtained from or through the utility, the issuer, the underwriters, Staff's advisors, the Issuance Advice Letter, the certifications, public sources or otherwise. Staff has assumed and relied upon, without undertaking any independent verification of, the accuracy and completeness of all of the factual, financial, and other information supplied or otherwise made available to, discussed with, or reviewed by Staff (including information that is available from generally recognized public sources), and Staff assumes no liability therefor. Staff has further assumed that all of the information furnished by the underwriters, the utility, the issuer and any other person (including, for the avoidance of doubt, the certifications) is complete and accurate as of the date hereof (except to the extent superseded by other information provided prior to the date hereof) and does not contain any material omissions or misstatement of material facts.

Staff assumes no responsibility for and expresses no view as to any projected financial data relating to the utility or the issuer, or the assumptions on which they are based, including,

² **EVERGY MISSOURI WEST, INC. d/b/a EVERGY MISSOURI WEST, P.S.C. MO No. 1**, 1st Revised Sheet No. 168.1 Canceling Original Sheet No. 168.1

³ See Footnotes 1 and 2 above.

but not limited to, any assumptions made regarding energy sales forecasts, ratepayer payment and charge-off patterns, defaults by third party suppliers, or servicing or administrative costs. With respect to any market data, projections, forecasts, and estimates, Staff has assumed that they have been reasonably prepared on bases reflecting the best currently available estimates and good faith judgments of the utility, the issuer, and underwriters.

Staff has assumed that the utility and the issuer will implement the transaction in accordance with the terms of the Financing Order and the transaction documents. Staff expresses no view regarding the sufficiency of true-up adjustments or other actions that the utility or the issuer are required to take under the transaction documents and the Financing Order.

WHEREFORE Staff submits this Recommendation in compliance with the Commission's *Order Directing Staff to Submit Ducera Report and Staff Recommendation*⁴ issued February 13, 2024, and prays the Commission accept same.

Respectfully submitted,

/s/ Jeffrey A. Keevil

Jeffrey A. Keevil

Missouri Bar No. 33825

P. O. Box 360

Jefferson City, MO 65102

(573) 526-4887 (Telephone)

(573) 751-9285 (Fax)

Email: jeff.keevil@psc.mo.gov

Attorney for the Staff of the
Missouri Public Service Commission

⁴ As noted in paragraph 1 above, the IAL filed by Evergy Missouri West and the Ducera letter are addressed in a separate Staff pleading.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 20th day of February 2024.

/s/ Jeffrey A. Keevil

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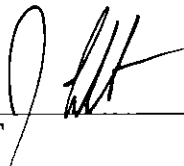
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AFFIDAVIT OF J LUEBBERT

STATE OF MISSOURI)	
)	ss.
COUNTY OF COLE)	

COMES NOW J LUEBBERT and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Compliance Tariff Recommendation*; and that the same is true and correct according to his best knowledge and belief.

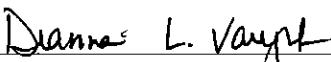
Further the Affiant sayeth not.



J LUEBBERT

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 20th day of February 2024.



 Notary Public

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: July 18, 2027 Commission Number: 15207377
