

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

Timothy Allegri and Denise Allegri,)	
)	
Complainants,)	File No. EC-2024-0015
)	
Evergy Missouri West, Inc.,)	
)	
Respondent.)	

**MOTION FOR CASE REVIEW and
MOTION FOR EXPEDITED TREATMENT**

COME NOW Complainants Timothy and Denise Allegri (“Complainants”), by and through this *Motion for Case Review and Motion for Expedited Treatment*, request the Commission order an expedited case review, and in support thereof state as follows:

1. Evidentiary hearings are currently scheduled for May 14-16, 2024. Complainants’ “*Reply to Docket Item #107, Evergy Missouri West’s Reply to Complainant Allegri’s Response to Motion to Dismiss Due to Lack of Controversy*” is attached hereto by hyperlink ([Docket Item #108](#)) and made of a part of this document for reference.

2. Evergy counsel stated on March 4, 2024:

“Evergy is **changing direction with this project** due to budgetary constraints and will not be pursuing the rebuild of the line **except for in the area that is impacted by MoDot’s [sic] work. Once Evergy has gathered** the necessary information on the **tracts that will be impacted**, it will reach out to those owners individually. In light of this information, there is no need to reconvene the mediation tomorrow.” [emphasis added]

3. Because this Complaint is not only about unauthorized and excessive easements being sought and violations made of CCN orders, but also the methods and practices used by Evergy in the transaction of their business, each issue raised in the complaint(s) must be addressed and deficiencies corrected.

4. Since Evergy's March 4, 2024 statement, it is necessary and reasonable for Evergy to withdraw easements from properties along the project path no longer impacted by the project as stated. Absent this corrective action and based upon past Evergy actions, false verified petitions and misleading methods applied in pressuring landowners into accepting an imagined 'cause' that has always lacked a verified plan, Evergy has not presented a revised project plan and/or information on impacted landowners and tracts, making it difficult for the Commissioners, complainants and all involved in an evidentiary hearing to address *all* of the concerns related to the project at the upcoming evidentiary hearings (see **Items 12, 18 and 19** of [Docket Item #108](#)).

5. In light of this fact, Complainants respectfully request the Commission to consider *rescheduling* the evidentiary hearings until such time Evergy presents its revised plan and files it on EFIS for all parties to see, and prior to beginning work on the revised project. Complainants would prefer to keep the current hearing schedule and do not desire delaying resolution of this matter, but everyone involved needs to be equipped with *all* of the necessary information to obtain a satisfactory outcome.

6. Whether or not the Commission decides to reschedule the May 2024 hearings, there are numerous concerns raised in this complaint that still need to be addressed.

MOTION FOR EXPEDITED TREATMENT

1. Pursuant to 20 CSR 4242.2.080(14) a party may move for expedited treatment of any pleading by including the words "*Motion for Expedited Treatment*" in the title and setting out the day by which the party asks the Commission to act, the harm or benefit resulting from inaction and whether the pleading was filed as soon as possible and if not, why it was not.

2. Complainants request an expedited case review to discuss Evergy's revised project plan as of March 4, 2024; and also to discuss whether or not it would be prudent to reschedule the May 14-16, 2024 evidentiary hearings until such time Evergy files its revised plan on EFIS.

3. By not knowing all of the details of the revised plan and continuing with the May 14-16, 2024 hearings, final orders regarding this case could not (or should not) be made, and would only result in another hearing to be scheduled once Evergy's revised plans become available.

4. Complainants request the Commission to order Evergy to provide a date its revised project plan is scheduled to become available, along with a list of impacted landowners.

5. This pleading was filed as soon as possible.

WHEREFORE, Complainants request the Commission to issue an *Order* setting a case review no later than May 9, 2024 to determine whether or not the evidentiary hearings scheduled for May 14-16, 2024 will be held or rescheduled to a later date when Evergy's revised plans become available, and to order Evergy to provide a date its revised project plan is scheduled to become available, along with a list of impacted landowners; and to file its revised project plan on EFIS prior to beginning work on the project.

Respectfully submitted this 2nd day of May, 2024 to all parties via EFIS by:

/s/ *Timothy P. Allegri*
Timothy P. Allegri

/s/ *Denise W. Allegri*
Denise W. Allegri