

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

In the Matter of the Fifth Prudence Review )  
Of Costs Subject to the Commission-Approved ) **Case No. EO-2023-0276**  
Fuel Adjustment Clause of Evergy Metro, )  
Inc. d/b/a Evergy Missouri Metro )

In the Matter of the Eleventh Prudence )  
Review of Costs Subject to the Commission- )  
Approved Fuel Adjustment Clause of Evergy ) **Case No. EO-2023-0277**  
Missouri West, Inc. d/b/a Evergy Missouri West )

**STAFF'S AMENDED STATEMENT OF POSITIONS**

**COMES NOW** Staff of the Missouri Public Service Commission, by and through counsel, and, as directed by the Commission's *Order Setting Procedural Schedule* issued March 15, 2024, hereby tenders this *Amended Statement of Positions* regarding the Amended List of Issues filed herein by Evergy Missouri West on May 9, 2024:

1. Has the Office of the Public Counsel applied the Commission recognized prudence standard in evaluating their proposed disallowances?

**Staff's Position:**

Staff takes no position on this issue at this time.

6. Was Evergy Missouri West's continuing decision to not acquire sufficient generation to protect its customers from the risks of the energy market and instead to rely on the energy market to meet a substantial portion of its customers' load requirements imprudent?

**Staff's Position:**

Staff agrees that Evergy Missouri West has relied on the market at times to meet its customers' energy needs. However, Staff does not consider this to be imprudent

and is unsure of what a reasonable disallowance would be based on the number of variables that would need to be considered when trying to quantify such a number.<sup>1</sup>

8. If Evergy Missouri West was imprudent with respect to Issue 6, above, should there be a disallowance?

If so, how much should the disallowance be?

D. Should the Commission adopt OPC's proposed ordered adjustment of \$86,376,294, with interest, to be applied in Evergy Missouri West's next FAR filing?

**Staff's Position:**

See Staff's Position on Issue 6 above.

**WHEREFORE**, Staff respectfully submits its *Amended Statement of Positions* in response to the Commission's *Order Setting Procedural Schedule* issued herein on March 15, 2024.

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

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Missouri Public Service Commission

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<sup>1</sup> Rebuttal testimony of Jordan Hull, page 3 lines 7-10.

**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 10<sup>th</sup> day of May 2024.

**/s/ Jeffrey A. Keevil**