

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

In the Matter of Evergy Missouri West,)
Inc. d/b/a Evergy Missouri West's)
Request for Authority to Implement a)
General Rate Increase for Electric Service) **File No. ER-2024-0189**

STAFF'S RESPONSE TO ORDER DIRECTING FILING

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and in response to the Commission's *Order Directing Filing*, filed in response to Evergy Missouri West's (Evergy's) *Request for Reconsideration and/or Clarification of Order Granting Motion to Compel* states as follows:

1. On February 2, 2024, Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("EMW" or "Evergy"), filed its *Request for Authority to Implement a General Rate Increase for Electric Service* pursuant to 20 CSR 4240-22.080(18), along with proposed revised tariff sheets in the above-captioned case.

2. On February 16, 2024, Staff served Data Request No. 159 upon Evergy, and on February 16, 2024, Staff served Data Request No.160 upon Evergy.

3. On May 8, 2024, a discovery conference was held in the above-captioned case to discuss issues the parties were having obtaining information concerning the above-referenced data requests.

4. On May 13, 2024, Staff filed a *Motion to Compel* regarding Data Request Nos. 159 and 160, and on May 20, 2024, Evergy filed its *Response* to that *Motion to Compel*.

5. The *Motion to Compel* was granted on June 4, 2024, and later that same day, Evergy filed a *Request for Reconsideration and/or Clarification of Order Granting to*

[sic] Motion to Compel. Evergy argued that the scope of the data requested in Data Request Nos. 159 and 160 and that was ordered to be produced was too broad, in that the data requested to be produced in the data requests is similar but not the same as what was ordered to be produced or what can be produced in case number EO-2024-0002, as referenced by in the *Order Granting the Motion to Compel*.

6. Staff requests that the Commission order Evergy to provide in response to Staff Data Request Nos. 159 and 160 whatever information it can produce, and to explain why it cannot produce any information it cannot produce. Staff suggests a date of June 17, 2024, at the latest, for this information to be submitted in response to Data Request Nos. 159 and 160 in EFIS.¹

WHEREFORE, Staff requests the Commission to issue an order compelling Respondent to provide responses to Staff Data Request Nos. 159 and 160, or explanations for any deficiency therein, and for such other relief it deems reasonable and just under the circumstances.

Respectfully submitted,

/s/ Carolyn H. Kerr
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¹ Staff is unaware of any aspect of the Commission's May 22, 2024 *Report and Order* which restricted Data Set 8(c)(3) and (4) to 100 total customers, as opposed to 100 customers per rate code, or all customers on a rate code on which less than 100 customers take service, as Evergy alleges.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, on this 11th day of June, 2024, to all counsel of record.

/s/ Carolyn H. Kerr