

**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 NOTICE OF START OF FIFTH RESRAM PRUDENCE REVIEW**

**COMES NOW** Staff of the Missouri Public Service Commission (“Staff”), by and through undersigned counsel, and for its *Notice of Start of Fifth RESRAM Prudence Review* (“Notice”), informs the Commission that, as part of this general rate proceeding, Staff has initiated its fifth RESRAM (“Renewable Energy Standard Rate Adjustment Mechanism”) prudence review as required by Evergy Missouri West, Inc. d/b/a Evergy Missouri West’s (“EMW” or “Company”) tariff and Commission Rule 20 CSR 4240-20.100(6)(A)11 and 20.100(6)(A)26. In further support, Staff states as follows:

1. EMW’s RESRAM was approved by the Commission in Case No. EO-2014-0151 and became effective December 1, 2014.<sup>1</sup>
2. Commission Rule 20 CSR 4240-20.100(6)(A)26 provides in part that “A prudence review of the costs subject to the RESRAM shall be conducted no less frequently than at intervals established in the rate proceeding in which the RESRAM is established.”
3. EMW’s RESRAM tariff (P.S.C. MO. No. 1, 2<sup>nd</sup> Revised Sheet No. 137.2) states in pertinent part:

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<sup>1</sup> See *Order Approving Tariff Filing In Compliance With Commission Order* (EFIS Item No. 55), issued November 18, 2014, in Case No. EO-2014-0151.

**PRUDENCE REVIEWS:**

**A prudence review shall be conducted no less frequently than at twenty-four (24) month intervals. A prudence review shall also be conducted concurrent with any general rate case filed by the Company.** Any costs which are determined by the Commission to have been imprudently incurred or incurred in violation of the terms of this Rider RESRAM shall be credited to customers through future adjustments to the RRR. Adjustments by Commission order, if any, pursuant to any prudence review shall be included in the RESRAM determination in OA above. Such amounts shall include monthly interest at the Company's monthly short-term borrowing rate. (Emphasis added)

4. Further, Commission Rule 20 CSR 4240-20.100(6)(A)11 provides in part that:

Commission approval of proposed rate schedules, to establish or modify a RESRAM, shall in no way be binding upon the commission in determining the ratemaking treatment to be applied to RES compliance costs **during a subsequent general rate proceeding when the commission may undertake to review the prudence of such costs.** (Emphasis added)

5. Pursuant to the foregoing rules and tariff provisions, Staff is undertaking its fifth RESRAM prudence review of EMW's RESRAM as part of the Company's general rate proceeding, Case No. ER-2024-0189. Staff last completed a prudence review of EMW's RESRAM in Case No. ER-2022-0130, for the period of January 1, 2020 through December 31, 2021. In the current case, Staff's prudence review will cover the period of January 1, 2022 through December 31, 2023.

6. Commission Rule 20 CSR 4240-20.100(6)(A)20 provides for intervention as follows:

A person or entity granted intervention in a rate proceeding in which a RESRAM is approved by the commission shall be a party to any subsequent related periodic adjustment proceeding or prudence review, without the necessity of applying to the commission for intervention; and the commission shall issue an order identifying them. **In any subsequent general rate proceeding, such person or entity must seek and be**

**granted status as an intervenor to be a party to that case.**  
(Emphasis added)

Since EMW's RESRAM was initially approved in a separate proceeding, Case No. EO-2014-0151, and this prudence review is being done in the context of EMW's general rate case proceeding, Staff believes that the language in bold above applies to this proceeding.

**WHEREFORE**, Staff prays the Commission accept this Notice of the start of its fifth EMW RESRAM prudence review as part of EMW's general rate case proceeding.

Respectfully submitted,

**/s/ Travis J. Pringle**

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### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all parties and/or counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 28<sup>th</sup> day of June, 2024.

**/s/ Travis J. Pringle**