

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

In the Matter of the Establishment of a)
Working Case for the Review and)
Consideration of Amending the Commission’s) File No. EW-2021-0165
Rule on Reporting Requirements for Electric)
Utilities and Rural Electric Cooperatives)

**EVERGY MISSOURI METRO’S AND EVERGY MISSOURI WEST’S
RESPONSE TO ORDER DIRECTING FILING**

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) (collectively, “Evergy” or the “Company”),¹ and, pursuant to the Missouri Public Service Commission’s (“Commission”) “Order”) issued in the above-captioned docket on December 16, 2020 responds as follows:

Evergy appreciates the opportunity and respectfully submits the following comments in response to the proposed solutions offered by Staff.

1. *Require the provision of interval data by the utility on a monthly basis, and retention of interval data for retrieval and study.*

RESPONSE: Provision of customer level, interval data on a regular basis represents a monumental effort and introduces a number of concerns that should be considered. Under current technologies, extracting a single month of hourly data for Evergy’s customers would require about 100 hours and would result in a file approximately 188 gigabytes in size. Additionally, this data would include customer specific information requiring levels of security and control at the Commission appropriate to protect personally identifiable information (PII). The Commission

¹ Effective October 7, 2019, Evergy Metro Inc. d/b/a Evergy Missouri Metro adopted the service territory and tariffs of Kansas City Power & Light Company (“KCP&L”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West adopted the service territory and tariffs of KCP&L Greater Missouri Operations Company (“GMO”).

should remain aware that this proposed requirement will be impactful to the Commission and its data infrastructure. With that consideration, and to stay consistent with the type of data that is presented in rate case proceedings, the Company believes it is most appropriate to provide the data at a more consolidated level, specifically, class data, Class Cost of Service (CCOS) Residential, Small General Service, Medium General Service, Large General Service, Large power, and Lighting, at the hourly level from a calendar month view. For the ease of both parties and given that the email systems allow for limited file transfer and may be unsecure, the Company recommends the PSC access and download the monthly data via the Company's web portal.

2. *Require the provision of hourly day-ahead cleared, real-time, and ancillary services at each generating unit.*

RESPONSE: Evergy can provide this information. It is highly confidential data that would disclose the Company's market position.

3. *Require the provision of hourly day-ahead schedule and real-time load at load nodes.*

RESPONSE: This is highly confidential information that the Company can provide.

4. *Require the consistent reporting of generation from PPAs as purchased power.*

RESPONSE: Evergy believes all purchased power agreements are purchased power and should be reported as such.

5. *Require that format changes in reported data be accompanied by notification from the utility and an explanation of the changes made.*

RESPONSE: When there are format changes in the reported data, the Company can provide a notification and explanation of the changes made at the time the report is filed.

6. *Require that password protection be removed from any electronic data file submitted to the Commission to meet these reporting requirements.*

RESPONSE: Evergy does not utilize password protection for electronic data files that are submitted to the Commission. Confidential information is filed accordingly through EFIS.

7. *Require enhanced reporting of decisions to permanently retire power plants.*

RESPONSE: The Company recommends that the Commission follow the SPP process for reporting plant retirement notifications and information. Per the SPP process, the Company is required to notify SPP at least 12 months prior to a plant retirement. This notification initiates a study process to determine if the plant can be retired without adverse impacts to the transmission system. The plant retirement notification/study request is confidential until the study is completed, and the requestor confirms that the final retirement decision has been made. It would be appropriate for the Commission to be aligned with the SPP process and for notifications to remain confidential until a final retirement decision has been made.

8. *Require the reporting of unit heat rate curve data.*

RESPONSE: This is highly confidential information that the Company can provide.

9. *Require the reporting of unit ramp rate data.*

RESPONSE: Any bid offer related information is viewed as marketing intelligence. This is highly confidential data that the Company can provide.

10. *Require the reporting of unit variable operations and maintenance data.*

RESPONSE: This is highly confidential information that the Company can provide.

11. *Require the reporting of fuel price data used for dispatch of coal units, when the dispatch fuel price uses the market price of coal.*

RESPONSE: The Company can provide the monthly delivered cost of coal, based upon forecasted coal deliveries for the operating month for each station, used in its coal unit market offers. This information is highly confidential.

12. *Require reporting of outages due to unforeseen occurrences.*

RESPONSE: The Company supports inclusive language that would require the reporting for forced outages of any fossil-fuel fired generating unit(s) with an accredited capacity of

greater than one hundred (100) megawatts that reasonably could be anticipated to last longer than three (3) days, when the unit(s) is forced out due to a common occurrence or unforeseen occurrences.

13. *Require the use of an administratively controlled form maintained on the PSC public website for the reporting of accidents or events by electric utilities and rural electric cooperatives. Reporting via telephone, fax machine, email, or EFIS notification will still be accepted.*

RESPONSE: The Company has no initial concerns with reporting accidents or events via telephone, fax, email, EFIS, or requiring the use of an administratively controlled form maintained on the PSC website.

WHEREFORE, Evergy Missouri Metro and Evergy Missouri West respectfully submit the above responses pursuant to the Commission's Order.

Respectfully submitted,

/s/ Robert J. Hack

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**Attorneys for Evergy Missouri Metro and
Evergy Missouri West**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served upon all counsel for Staff and the Office of the Public Counsel on this 2nd day of March 2021, via e-mail.

/s/ Robert J. Hack

Robert J. Hack