

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

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| In the Matter of the Establishment of a |) | |
| Working Case for the Review and |) | |
| Consideration of Amending the Commission’s |) | File No. EX-2025-0034 |
| Rule on Reporting Requirements for Electric |) | |
| Utilities and Rural Electric Cooperatives |) | |

**COMMENTS OF EVERGY MISSOURI METRO
AND EVERGY MISSOURI WEST**

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 in response to the *Notice of Hearing and Comment Period* (“Order”) issued on August 5, 2024 by the Missouri Public Service Commission (“Commission” or “PSC”), and provides the following comments in advance of the hearing scheduled for October 11, 2024.

Evergy appreciates the opportunity to participate in this rulemaking and the collaborative efforts led by Staff (“Staff”) for the Commission.

Staff and Evergy engaged in multiple helpful exchanges and dialogue regarding the proposed amendments, this includes an email exchange on May 3, 2024, related to criteria in which the Company can comply with the proposed amendment ***A (6) Total load for each hour by: (C) Retail load by: (I) Rate code if customers taking service on a rate code are metered at a consistent voltage.*** The Company respectfully submits the following criteria shared with Staff via email on May 3, 2024, regarding the criteria in which it can and intends to comply with (6)(C)(I) to deliver hourly data by rate code at limited additional expense:

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”).

- Evergy to only offer one month view of data (no historical data);
- The month is a calendar view of data and does not tie to revenue month, billing details or revenue/usage for rate cases;
- The hourly data will be provided by rate code as used in Evergy billing systems; and
- The data set will not be stored by Evergy for future use or compares. It will be a once a month pull.

Regarding (7)(B), *information in this section shall be provided in an electronic format from which the data can be easily extracted for analysis in spreadsheet or database software using the templates provided by the commission*, Evergy will need time to transition from the current reporting formats to the Staff's proposed templates. Barring there are no technology or major enterprise issues outside of the Company's control, Evergy estimates that 3 months are needed to allow for system or reporting configurations to comply with the reporting templates.

WHEREFORE, Evergy respectfully submits the attached responses pursuant to the Commission's Order.

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner, MBN 39586
Phone: (816) 556-2314
E-mail: roger.steiner@evergy.com
Evergy, Inc.
1200 Main – 16th Floor
Kansas City, Missouri 64105
Fax: (816) 556-2787

Attorney 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 3rd day of October 2024 via e-mail.

/s/ Roger W. Steiner

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