

**BEFORE THE PUBLIC SERVICE COMMISSION
FOR THE 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. EX-2025-0034
Rule on Reporting Requirements for Electric)
Utilities and Rural Electric Cooperatives)

**EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST
RESPONSE TO OPC COMMENTS**

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”) and, for their response to the Office of the Public Counsel’s (“OPC”) *Response to Proposed Amendments to the Rule 20 CSR 4240-3.190 Reporting Requirements for Electric Utilities and Rural Electric Cooperative Rules* (“OPC Comments”) filed in this docket on October 3, 2024 with the Missouri Public Service Commission (“Commission”), states as follows:

1. The Company has worked with Staff (“Staff”) for the Commission to ensure that it can meet the proposed reporting requirements of the rule; see *Evergy Comments* filed on October 3, 2024. The Company does not understand why OPC requests in paragraph 3(J) that MWh load be reported each hour. The Company is able to provide load information in kWh format only, because the system of record, MDM, retains meter retail usage data in kWh format.

2. In addition, OPC’s addition of paragraph 3(L) takes the rule beyond normal reporting to include a “catch-all” for any additional information. The Company requests that the Commission reject this open-ended addition.

3. Finally, the Company’s has concerns with OPC’s new language in 3(E) that implies the curve is a result of the heat rate testing. This would require a multi-point heat rate test for each

unit, significantly increasing the Company's cost of compliance. The Company's current heat rate testing procedure includes testing at a single load point. The Company met with Staff on April 30th, 2024 to discuss this provision of the rule and Staff requested heat rate curves be submitted for system modelling. The Company develops and maintains Heat Input curves for the Southwest Power Pool Integrated Marketplace ("SPPIM") and was planning to comply by submitting these curves. A single-point heat rate test would reaffirm the existing curve or could prompt an engineering review/update to the curve. The Company requests that OPC's edits either be clarified or not be included in the rule to avoid confusion. If the Commission adopts OPC's recommendation to split proposed subsection (1)(D), the Company recommends the following edits: "Schedule of planned fuel test burns ~~heat rate tests~~. Documentation of the results of all accreditation runs, fuel test burns, ~~and~~ heat-rate tests and ~~with a~~ current heat-rate curves ~~included in heat rate test documentation.~~"

WHEREFORE, Evergy respectfully submits the attached response to the OPC's Comments.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorney for Evergy Missouri Metro and Evergy
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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 10th day of October 2024 via e-mail.

/s/ Roger W. Steiner

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