

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



The Office of the Public Counsel and  
The Midwest Energy Consumers Group,

Complainants,

v.

KCP&L Greater Missouri Operations  
Company

Respondent.

**File No. EC-2019-0200**

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**REPORT AND ORDER**

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**Issue Date: October 17, 2019**

**Effective Date: October 27, 2019**

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The Office of the Public Counsel and	)	
The Midwest Energy Consumers Group,	)	
	)	
Complainants,	)	
	)	
v.	)	<b><u>File No. EC-2019-0200</u></b>
	)	
KCP&L Greater Missouri Operations	)	
Company	)	
	)	
Respondent.	)	

## **APPEARANCES**

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For the Office of the Public Counsel and the Public.

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For the Midwest Energy Consumers' Group.

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**Karl Zobrist**, Attorney at Law, Dentons US LLP, 4520 Main Street, Suite 1100, Kansas City, Missouri 64111.

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For KCP&L Greater Missouri Operations Company<sup>1</sup>

**Casi Aslin**, Associate Counsel, and **Nicole Mers**, Deputy Staff Counsel, 200 Madison Street, Suite. 800, Jefferson City, Missouri 65102-0360.

For the Staff of the Missouri Public Service Commission.

Chief Regulatory Law Judge: **Morris L. Woodruff**

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<sup>1</sup> After the final briefs were submitted, KCP&L Greater Missouri Operations Company changed its name to Evergy Missouri West. Similarly, Kansas City Power & Light Company changed its name to Evergy Missouri Metro. To avoid confusion, the Commission will refer to the companies by the names used throughout the case.

# REPORT AND ORDER

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The Missouri Public Service Commission, having considered all the competent and substantial evidence upon the whole record, makes the following findings of fact and conclusions of law. The positions and arguments of all of the parties have been considered by the Commission in making this decision. Failure to specifically address a piece of evidence, position, or argument of any party does not indicate that the Commission has failed to consider relevant evidence, but indicates rather that the omitted material was not dispositive of this decision.

## Procedural History

On December 28, 2018, the Office of the Public Counsel and the Midwest Energy Consumers Group (MECG) filed what they denominated as a Petition for an Accounting Order. That petition asked the Commission to order KCP&L Greater Missouri Operations Company (GMO) to record as a regulatory liability in Account 254 the revenue and the return on the Sibley unit investments collected in rates for non-fuel operations and maintenance costs, taxes, including accumulated deferred income taxes, and all other costs associated with Sibley units 1, 2, 3, and common plant.

The Petition for an Accounting Order was filed as a petition, not as a complaint, and it was assigned File No. EU-2019-0197 in the Commission's Electronic Filing and Information System (EFIS). The Commission, acting on its own motion, determined that the Petition could best be considered using complaint-type procedures. The Commission closed File No. EU-2019-0197, and reassigned the Petition to File No. EC-2019-0200, which is a complaint designation within EFIS. The Commission then issued a Notice of Complaint to provide notice of the filing to GMO, and directed GMO to file an answer to the "complaint" by February 1, 2019.

GMO filed its answer on February 1, 2019, and on February 5, 2019, filed a motion to dismiss the complaint for failure to state a claim for relief. The Commission denied that motion to dismiss on March 6, 2019. Thereafter, the Commission adopted a procedural schedule.

The parties prefiled direct, rebuttal, cross-rebuttal, and surrebuttal testimony. An evidentiary hearing was held on August 7 and 8, 2019. Thereafter, the parties filed initial briefs on August 29, 2019, and reply briefs on September 10, 2019.

### **Pending Motion**

The Commission's Staff filed a motion on September 12, 2019, asking the Commission to strike a section of MEEG's reply brief. The challenged section of MEEG's brief is entitled "Staff Lacks Objectivity in Recent KCPL and GMO Cases,"<sup>2</sup> and consists largely of accusations that the Commission's Staff has recently taken positions in various cases that are overly aligned with the positions espoused by Kansas City Power and Light Company (KCP&L) and its sister utility, GMO. The brief warns the Commission to beware of Staff's lack of objectivity so that it "may adequately consider whether Staff's position

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<sup>2</sup> Reply Brief of the Midwest Energy Consumers' Group, Section H1, pages 16-19.

establishes an appropriate balancing of the interest of ratepayers and shareholders.”<sup>3</sup> Staff contends the challenged section of the brief is intended to “improperly poison the Commission’s mind against Staff” and on the basis should be struck. MEGC did not respond to Staff’s Motion to Strike.

In support of its Motion, Staff cites Missouri’s Rule of Civil Procedure 55.27(e), which allows the court to strike from any pleading “any redundant, immaterial, impertinent, or scandalous matter.” Staff also cites Commission Rule 20 CSR 4240-2.080(6)(A), which requires that arguments before the Commission must not be “presented or maintained for any improper purpose, such as to harass ... .”

After reviewing the challenged section of MEGC’s reply brief, the Commission finds it to be an unpersuasive attempt to cast aspersions on the integrity of the Commission’s Staff. Nevertheless, the arguments presented in the brief do echo matters addressed at the hearing and on that basis should not be struck. While the Commission will not strike the portions of the brief challenged by Staff, it will address the argument raised in that section later in this order.

### **Findings of Fact**

1. GMO is a Missouri certificated electrical corporation as defined by Subsection 386.020(15), RSMo 2016, and is authorized to provide electric service to portions of Missouri.

2. Sibley units 1, 2, and 3 were coal-fired generation units located near the town of Sibley, in Jackson County, Missouri.<sup>4</sup>

3. The Sibley units were initially constructed by GMO’s predecessor, Missouri Public Service Company. Sibley 1, completed in June 1960, had a capacity of 48 MWs.

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<sup>3</sup> Reply Brief of the Midwest Energy Consumers’ Group, page 19.

<sup>4</sup> Transcript, Page 398, Lines 20-25.

Sibley 2, completed in May 1962, had a capacity of 51 MWs. Sibley 3, built in June 1969, had a capacity of 364 MWs.<sup>5</sup>

4. In 1991, Missouri Public Service Company completed a major renovation of the Sibley units to extend the life of the units and to allow the units to burn low sulfur western coal.<sup>6</sup>

5. GMO added scrubbers to Sibley unit 3 in 2009 to meet environmental requirements.<sup>7</sup>

6. On June 2, 2017, GMO announced it would be retiring Sibley units 1, 2, and 3 by December 31, 2018.<sup>8</sup>

7. The Sibley 3 unit suffered a forced outage on September 5, 2018 as a result of turbine vibrations and ceased generating electricity at that time.<sup>9</sup>

8. Rather than repair the Sibley 3 unit, all three Sibley units were retired by GMO on November 13, 2018.<sup>10</sup> All of Sibley unit 1, except the boiler, had previously been retired on June 1, 2017.<sup>11</sup>

9. The aggregate financial impact of the retirement of the Sibley units exceeds five percent of GMO's reported net income, although the parties disagree about the exact amount of that impact.<sup>12</sup>

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<sup>5</sup> Meyer Direct, Ex. 1, Page 3, Lines 7-11.

<sup>6</sup> Meyer Direct, Ex. 1, Page 3, Lines 12-13.

<sup>7</sup> Transcript, Pages 176-177, Lines 22 -25, 1-13.

<sup>8</sup> Ives Rebuttal, Ex. 24, Page 11, Lines 4-8.

<sup>9</sup> Transcript, Page 377, Lines 7-11. *See also*, Ex. 26 and Transcript, Page 379, Lines 12-17.

<sup>10</sup> Transcript, Page 402, Lines 7-8.

<sup>11</sup> Spanos Rebuttal, Ex. 21, Page 6, fn.1.

<sup>12</sup> Oligtschlaeger Cross-Rebuttal, Ex. 17, Pages 6-7, Lines 21-22. 1-3, Schallenberg Direct, Ex. 5, Pages 10-12, Lines 24-30, 1-15, 1-7. Spanos Rebuttal, Ex. 21, Schedule JJS-1. Meyer Direct, Ex. 1, Page 14, Lines 9-14.

10. At the time of the retirement of the Sibley units, GMO had a general rate case pending before the Commission in File No. ER-2018-0146. The Commission used a historic test year in that rate case, with a true-up date of June 30, 2018.<sup>13</sup> The Sibley units were operating at that time and the cost of operating those units are incorporated into GMO's current rates, which went into effect on December 6, 2018. That means GMO's ratepayers are continuing to pay for GMO's ongoing expenses to operate the Sibley units even though they are no longer producing power.<sup>14</sup>

11. GMO's position in the rate case was that while it anticipated the Sibley units would be retired by December 31, 2018, that decision had not been finally made and the retirement could be delayed by unforeseen circumstances such as the loss of other generating facilities.<sup>15</sup>

12. GMO's rate case in File No. ER-2018-0146 was resolved through a series of stipulations and agreements that were presented to the Commission on October 3, 2018.<sup>16</sup> GMO did not inform the signatories to the stipulation and agreement, including Public Counsel, or the Commission, except for a routine notification to Staff, that Sibley 3 had ceased operation in September until the units were formally retired in November,<sup>17</sup> which was after the stipulation and agreement had been approved by the Commission on October 31, 2019.<sup>18</sup>

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<sup>13</sup> Transcript, Page 232, Lines 2-10.

<sup>14</sup> *In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement a General Rate Increase for Electric Service*, File No. ER-2018-0146, Order Approving Stipulations and Agreements, October 31, 2018, Partial Stipulation and Agreement resolving revenue requirement issues, Page 9.

<sup>15</sup> Transcript, Page 404, Lines 3-15.

<sup>16</sup> Transcript Page 395, Lines 8-15.

<sup>17</sup> Transcript, Page 397, Lines 11-18.

<sup>18</sup> *In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement a General Rate Increase for Electric Service*, File No. ER-2018-0146, Order Approving

13. In a provision regarding the retirement of the Sibley and Lake Road units, the approved stipulation and agreement included a provision stating:

This Stipulation does not preclude any Signatory from proposing an accounting authority order (“AAO”) or any other ratemaking treatment, for the recovery of any other costs associated with the KCP&L and GMO retirements listed above. This Stipulation does not preclude any party from opposing an AAO, or any other ratemaking treatment, for the recovery of any other costs associated with the KCP&L and GMO retirements of the units listed above.<sup>19</sup>

14. The approved stipulation and agreement also required GMO to:

[C]reate a regulatory liability to capture the amount of depreciation expense included in GMO’s revenue requirement beginning when each of the following units is retired and depreciation expense is no longer recorded on GMO’s books: Sibley units 1, 2, and 3, including common plant, and Lake Road unit 4/6.<sup>20</sup>

15. If the parties had known that Sibley 3 had ceased producing power and would be retired, they could have proposed an isolated adjustment outside the test year and true-up date to remove the operating costs of the retired units from GMO’s new rates.<sup>21</sup>

16. Because of GMO’s election to use Plant In Service Accounting (PISA) as it is allowed to do under Section 393.1400(5) RSMo, its rates are currently frozen by the terms of Section 393.1655.2 RSMo, and new rates cannot be effective before December 6, 2021.<sup>22</sup>

17. GMO has not retired a major generating facility in the last thirty years. Its last retirements were the Edmond Street plant in 1987 and Ralph Green Units 1 and 2 in

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Stipulations and Agreements, October 31, 2018.

<sup>19</sup> *In the Matter of KCP&L Greater Missouri Operations Company’s Request for Authority to Implement a General Rate Increase for Electric Service*, File No. ER-2018-0146, Non-Unanimous Partial Stipulation and Agreement, Page 9. See also, Transcript, Page 182, Lines 7-14.

<sup>20</sup> *In the Matter of KCP&L Greater Missouri Operations Company’s Request for Authority to Implement a General Rate Increase for Electric Service*, File No. ER-2018-0146, Non-Unanimous Partial Stipulation and Agreement, Page 9.

<sup>21</sup> Transcript, Page 310, Lines 14-17.

<sup>22</sup> Ives Rebuttal, Ex. 24, Page 26, Lines 12-13. See also, Transcript, Page 296, Lines 17-22.



November 1982.<sup>23</sup>

18. Retirement of coal-fired units is more common in the industry as a whole. A total of 89,731 MW of coal-unit capacity has been retired since 1969. About 85 percent of that total, 76,526 MW, has been retired since 2010.<sup>24</sup>

19. GMO's current depreciation rates for Sibley unit 3 are based on a 2040 retirement date.<sup>25</sup>

20. It is unusual to close a generating plant with twenty years of remaining anticipated service life and twenty years of unrecovered depreciation expense.<sup>26</sup>

21. The estimated net book value of each Sibley unit and the common assets at Sibley as of June 30, 2018, as calculated by GMO's witness, is \$145.7 million.<sup>27</sup> Public Counsel's witness estimated that net book value at \$160 million,<sup>28</sup> while MCEG's witness estimated that value at \$300 million.<sup>29</sup>

22. The Sibley retirement is the only coal plant retirement in the Southwest Power Pool footprint that had a projected remaining operation life of more than twenty years and more than \$100 million in remaining book value.<sup>30</sup>

23. In its 2018 10K filed with the Security and Exchange Commission (SEC) Evergy (the parent of GMO) indicates its

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<sup>23</sup> Schallenberg Direct, Ex. 5, Page 12, Lines 17-20.

<sup>24</sup> Rodgers Rebuttal, Ex. 20, Page 8, Lines 19-23.

<sup>25</sup> Schallenberg Direct, Ex. 5, Page 13, Lines 10-13.

<sup>26</sup> Transcript, Page 340, Lines 12-18.

<sup>27</sup> Spanos Rebuttal, Ex. 21, Page 6, Line 17.

<sup>28</sup> Schallenberg Direct, Ex. 5, Page 8, Lines 31-33.

<sup>29</sup> Meyer Direct, Ex. 1, Page 13, Lines 3-9.

<sup>30</sup> Marke Surrebuttal, Ex. 14, Page 10, Lines 20-23.

regulatory assets increased by \$243.4 million primarily due to the reclassification of retired generating plant of \$159.9 million related to GMO's Sibley No. 3 Unit from property, plant and equipment, net to a regulatory asset upon the retirement of the unit in 2018.<sup>31</sup>

The creation of such a regulatory assets means the company believes those costs will probably be recovered from future revenues.<sup>32</sup>

24. The magnitude of the decision to retire the Sibley units is demonstrated by the fact that while GMO reported it retired \$30,998,133 of steam production plant in 2016,<sup>33</sup> and \$26,834,314 in 2017,<sup>34</sup> in 2018 it reported retiring \$486,451,128 of steam production plant, a number that it attributed to the retirement of the Sibley units.<sup>35</sup>

### **Conclusions of Law**

A. Subsection 386.020(15), RSMo 2016 defines "electrical corporation" as including:

every corporation, company, association, joint stock company or association, partnership and person, their lessees, trustees, or receivers appointed by any court whatsoever, ... owning, operating, controlling or managing any electric plant except where electricity is generated or distributed by the producer solely on or through private property for railroad, light rail or street railroad purposes or for its own use or the use of its tenants and not for sale to others;

By the terms of the statute, GMO is an electrical corporation and is subject to regulation by the Commission pursuant to Section 393.140, RSMo 2016.

B. Public Counsel and MCEG are authorized to bring a complaint before the Commission by Section 386.390.1, RSMo 2016.

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<sup>31</sup> Schallenberg Direct, Ex. 5, Page 6, Lines 20-29.

<sup>32</sup> Schallenberg Direct, Ex. 5, Pages 7-8.

<sup>33</sup> Ex. 7.

<sup>34</sup> Ex. 8.

<sup>35</sup> Ex. 9. These numbers are discussed at pages 158-160 of the Transcript.

C. Commission Rule 20 CSR 4240-20.030(1) requires Missouri utilities to keep all accounts in conformity with the Uniform System of Accounts (USOA) as prescribed by the Federal Energy Regulatory Commission, as published at 18 CFR Part 101.

D. Instruction number 7 of the General Instructions for the Uniform System of Accounts provides that a utility's net income should generally reflect all items of profit and loss during the period. However, that instruction allows for special treatment of certain items. In the words of the instruction:

Those items related to the effects of events and transactions which have occurred during the current period and which are of unusual nature and infrequent occurrence shall be considered extraordinary items. Accordingly, they will be events and transactions of significant effect which are abnormal and significantly different from the ordinary and typical activities of the company and which would not reasonably be expected to recur in the foreseeable future. ... To be considered as extraordinary under the above guidelines, and item should be more than approximately 5 percent of income, computed before extraordinary items. Commission approval must be obtained to treat an item of less than 5 percent, as extraordinary.<sup>36</sup>

E. The Commission has authority to defer extraordinary costs of a utility for consideration in a later period. In doing so, it is not engaging in single-issue rate making.<sup>37</sup>

F. The purpose of an Accounting Authority Order (AAO) is to defer a final decision on current extraordinary costs until a rate case is in order. In that subsequent rate case, the Commission is not bound by the terms of the AAO in setting new rates.<sup>38</sup>

G. In a 1991 decision involving a request for an AAO, the Commission held that an AAO was appropriate where "events occur during a period which are extraordinary, unusual and unique, and not recurring." This has sometimes been described as "the Sibley Standard."<sup>39</sup>

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<sup>36</sup> 18 CFR Ch. 1, Pt. 101, General Instruction 7. That regulation is in the record as Ex. 4.

<sup>37</sup> *State ex rel. Office of Pub. Counsel v. Pub. Serv. Com'n of Mo.* 858 S.W. 2d 806 (Mo. App. W.D. 1993).

<sup>38</sup> *Missouri Gas Energy v. Pub. Serv. Com'n of Mo.*, 978 S.W. 2d 434 (Mo. App. W.D. 1998).

<sup>39</sup> *In the Matter of the Application of Missouri Public Service for the Issuance of an Accounting Order*

H. Retroactive ratemaking, defined as “the setting of rates which permit a utility to recover past losses or which require it to refund past excess profits collected under a rate that did not perfectly match expenses plus rate-of-return with the rate actually established” is prohibited.<sup>40</sup>

I. Section 393.1655.2, RSMo provides that an electrical corporation’s base rates are to be held constant for a period of three years after the utility gave notice of its election under section 393.1400(5), RSMo to make the plant-in service deferrals allowed by that statute.

### **Decision**

This is an unusual case in that most often requests for an AAO are made by a utility seeking to defer to a regulatory asset some cost it has incurred, thereby allowing for the possible recovery of those costs in a later rate case. This time the request for an AAO is coming from parties representing ratepayers and asks the Commission to defer to a regulatory liability the savings the utility will accrue from its decision to close the Sibley generating plant. Despite the identity of the parties requesting the AAO and the fact that creation of a regulatory liability rather than a regulatory asset is sought, this request can be considered under the same standards the Commission has consistently used to evaluate other requests for an AAO.

The USOA definition of extraordinary items for which an AAO may be appropriate clearly applies to both items of profit and loss, as does the Commission’s “Sibley standard” for considering whether an AAO should be issued. Therefore, the question before the

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*Relating to its Electrical Operations*, Case No. EO-91-358, Report and Order, 1 Mo. P.S.C. 3d 200, 205, 1991.

<sup>40</sup> *State ex rel Utility Consumers’ Council of Mo., Inc. v. Pub. Serv. Com’n*, 585 S.W.2d 41, 59 (Mo. banc 1979).

Commission is whether GMO's decision to close the Sibley units is "extraordinary, unusual and unique, and not recurring."

In describing the factors that should be taken into account when deciding whether a given item of profit or loss should be considered "extraordinary", the USOA definition refers to significant events and transactions that are "abnormal and significantly different from the ordinary and typical activities *of the company*." (emphasis added). Thus, the focus of the standard is on the abnormality and significance of the event and transaction on the company, not on the industry as a whole. That is a reasonable focus as the Commission is expected to determine whether the event is extraordinary and a justification for an AAO for a single utility, not for the industry as a whole.

Clearly, it is unusual for GMO to retire a generating unit as it has not done so in the past thirty years. More importantly, it is unusual and unique for a utility to retire a generating unit with twenty years of remaining anticipated service life, and twenty years of unrecovered depreciation expense. It is also significant that the Sibley plant was retired just after GMO's last rate case was resolved and in fact before those new rates went into effect. Because of the PISA related rate freeze, those rates, through which GMO's ratepayers will continue to pay GMO's costs of operating a power plant that no longer produces power, will remain in effect for at least three years.

Most importantly, if GMO requests accelerated recovery of net plant depreciation costs in its next rate case, the Commission should preserve the option of the future Commission to consider the offset of those costs by consideration of the past savings amounts that would be deferred under the AAO. If this AAO is not granted, such an offset could be challenged as retroactive ratemaking.

GMO chose to close the Sibley units, and the prudence of that decision is not at issue in this case. The question of prudence will be addressed in a future general rate

case. Similarly, GMO's current level of earnings is not a factor in the Commission's decision. The question of whether a utility is currently earning an appropriate rate of return through its established rates is a question to be determined after consideration of all relevant factors in a general rate case. That determination cannot be made with only limited information while considering a request for an AAO.

GMO has suggested that an AAO should not be established because it is currently not earning its allowed return on equity and deferring the savings it would otherwise accrue from the closing of the Sibley units would cause its net earnings levels to drop even lower. As previously indicated, the Commission will not attempt to make any determination of the sufficiency of GMO's current rates in this proceeding. However, those current rates were set in GMO's last rate case using an assumption that the Sibley units were in operation and that the costs of operating those units would be recovered from ratepayers through those rates. GMO's net income was thus enhanced when the costs of operating the Sibley units went away with the closing of the plant, while rates including those costs remain in effect. This order requires GMO to defer that enhancement to its earnings, but it does not impair the company's opportunity to earn the rate of return established in its last rate case.

The Commission also emphasizes that its decision to grant this AAO does not mean the Commission is waiving in its support for renewable energy. On the contrary the State of Missouri, and this Commission in particular firmly support the expansion of renewable energy as a resource to provide clean energy to Missourians. Furthermore this decision should not be taken as an indication that the Commission will dissuade Missouri utilities from retiring economically inefficient coal-fired generation plants in the future. Rather, this decision is based solely on the Commission's consideration of the particular circumstances of this case.

The Commission will briefly address one more issue. MEGC contended at the hearing and in its briefs that the Commission's Staff has been overly supportive of KCP&L and GMO's positions in several recent cases. Aside from a meaningless comparison of the number of data requests submitted in the recent merger case involving Great Plains Energy (KCP&L and GMO's parent company) and Westar Energy, MEGC offers little support for this theory. Although it is denying Staff's motion to strike the portion of MEGC's brief addressing this theory, the Commission will state that it is not persuaded by unsupported accusations of impropriety.

Having decided that an AAO should be established, one more question remains: What amount is to be deferred? This order finds that the retirement of the Sibley units is extraordinary, and will direct GMO to establish the AAO requested by Public Counsel and MEGC. That is the only relief sought by Public Counsel and MEGC, and it is not necessary for them to establish the amount to be deferred. If GMO believes it needs the Commission's guidance on establishing the amount to be deferred, it may file a new application seeking that guidance. That course will make this order a final order from which GMO may seek rehearing and ultimately appeal.

Because of the need for a prompt resolution of this matter, the Commission will make this order effective in ten days.

**THE COMMISSION ORDERS THAT:**

1. Staff's Motion to Strike is denied.
2. KCP&L Greater Missouri Operations Company shall record as a regulatory liability in Account 254 the revenue and the return on the Sibley unit investments collected in rates for non-fuel operations and maintenance costs, taxes, including accumulated

deferred income taxes, and all other costs associated with Sibley units 1, 2, 3, and common plant. The regulatory liability should quantify separately dollars related to return and other cost of service expense savings.

3. This report and order shall be effective on October 27, 2019.

**BY THE COMMISSION**



A handwritten signature in blue ink that reads "Morris L. Woodruff".

Morris L. Woodruff  
Secretary

Silvey, Chm., Rupp, and Coleman, CC., concur;  
Hall, C., concurs with separate concurring opinion to follow;  
Kenney, C., dissents;  
and certify compliance with the  
provisions of Section 536.080, RSMo 2016

Dated at Jefferson City, Missouri,  
on this 17<sup>th</sup> day of October, 2019.



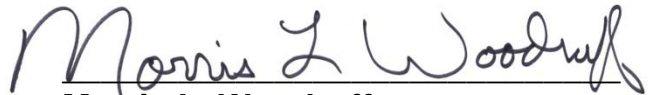
**STATE OF MISSOURI**

**OFFICE OF THE PUBLIC SERVICE COMMISSION**

**I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.**

**WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 17<sup>th</sup> day of October 2019.**



  
**Morris L. Woodruff**  
**Secretary**

**MISSOURI PUBLIC SERVICE COMMISSION**

**October 17, 2019**

**File/Case No. EC-2019-0200**

**Missouri Public Service  
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**Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).**

**Sincerely,**



**Morris L. Woodruff  
Secretary**

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Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.