

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

In the Matter of Evergy Metro, Inc. d/b/a Evergy)
Missouri Metro’s Request for Authority to) **Case No. ER-2022-0129**
Implement A General Rate Increase for Electric)
Service)

In the Matter of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West’s Request for Authority to) **Case No. ER-2022-0130**
Implement A General Rate Increase for Electric)
Service)

STAFF RESPONSE TO NOTICE OF ADDING NEW SPP CHARGE TYPES

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through undersigned counsel, and for its *Response to Notice of Adding New SPP Charge Types* (“Response”), respectfully states as follows:

1. On November 1, 2024, Evergy Missouri West, Inc. d/b/a Evergy Missouri West and Evergy Metro, Inc. d/b/a Evergy Missouri Metro (collectively “Evergy”), in accordance with Commission Rule 20 CSR 4240-20.090(8)(D)1.A., filed a *Notice of Adding New SPP Charge Types* (“Notice”) in Case Nos. ER-2022-0129 and ER-2022-0130. The Notice stated that Evergy intends to include new Southwest Power Pool (“SPP”) charge types in its next Fuel Adjustment Rate (“FAR”) filing to be made on January 1, 2025.

2. Commission Rule 20 CSR 4240-20.090(8)(D)1.B. requires the Notice include:

- (I) Identification of the account affected by the change; (II) A description of the new market settlement type or schedule demonstrating that the cost or revenue it covers possesses the characteristics of, and is of the nature of, a cost or revenue allowed in the electric utility’s FAC by the commission in the most recent general rate proceeding; and (III) Identification of the preexisting

schedule, or market settlement type which the new settlement type or schedule replaces or supplements;

3. Commission Rule 20 CSR 4240-20.090(8)(D)1.C.(I) requires any party that wishes to challenge the inclusion of these new charge types do so via filing within 30 days of the Notice. In this instance, that would be December 2, 2024.¹

4. Staff issued data requests to Evergy requesting further information to determine if these new SPP charge types demonstrated that the “cost or revenue it covers possesses the characteristics of, and is of the nature of, a cost or revenue allowed in the electric utility’s FAC by the commission in the most recent general rate proceeding,” as required by Commission Rule 20 CSR 4240-20.090(8)(D)1.B.(II).

5. Having reviewed Evergy’s Notice and subsequent responses to Staff data requests, Staff does not challenge the inclusion of these new SPP charge types at this time.

6. However, based on the responses for the Uninstructed Resource Deviation (“URD”) charge types, Staff’s understanding is that these charge types would mainly occur when a resource is experiencing unit issues or equipment failures, which can be outside the control of the utility. If these charge types are experienced as the result of Evergy deviating from its dispatch instructions for reasons within its control, Staff may question the prudence of these charge types in a future prudence review.

¹ December 1, 2024 is thirty days from the filing of Evergy’s Notice. However, because December 1, 2024 falls on a Sunday, Commission Rule 20 CSR 4240-2.050(1) provides that, when the last day of a period of time contemplated by the Commission falls on a Saturday, Sunday, or legal holiday, the period shall run until the end of the next day which is not a Saturday, Sunday, or legal holiday. In this instance, that would be Monday, December 2, 2024.

7. Staff will continue to monitor these new SPP charge types in future Fuel Adjustment Clause (“FAC”) prudence reviews. This Response is not indicative, and should not be misconstrued as indicative, of the prudence of these charge types.

WHEREFORE, Staff submits this Response for the Commission’s knowledge and information.

Respectfully submitted,

/s/ Travis J. Pringle

Travis J. Pringle
Missouri Bar No. 71128
Chief Deputy Counsel
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Mo 65102-0360
(573) 751-5700 (Telephone)
(573) 526-1500 (Facsimile)
(Email) travis.pringle@psc.mo.gov

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 26th day of November, 2024.

/s/ Travis J. Pringle

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc. d/b/a Evergy)
Missouri Metro’s Request for Authority to) Case No. ER-2022-0129
Implement a General Rate Increase for Electric)
Service)

In the Matter of Evergy Missouri West, Inc.)
d/b/a Evergy Missouri West’s Request for) Case No. ER-2022-0130
Authority to Implement a General Rate)
Increase for Electric Service)

AFFIDAVIT OF BROOKE MASTROGIANNIS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW BROOKE MASTROGIANNIS, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Response*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Brooke Mastrogiannis

BROOKE MASTROGIANNIS

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 26th day of November 2024.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2027
Commission Number: 15207377

Dianna L. Vaught

Notary Public