

**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 Implement a General Rate Increase for Electric ) **Case No. ER-2022-0129**  
Service )

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

**EVERGY MISSOURI METRO’S AND EVERGY MISSOURI WEST’S REPLY TO  
STAFF AND OPC RESPONSES TO  
NOTICE OF ADDING NEW SPP CHARGE TYPES**

COME NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“EMM”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“EMW”) (collectively, “Evergy” or “the Company”) and, for their *Reply* (“Reply”) to Staff (“Staff”) for the Missouri Public Service Commission’s (“Commission”) and the Office of the Public Counsel’s (“OPC”) respective responses to Evergy’s *Notice of Adding New SPP Charge Types* (“Notice”) filed on November 1, 2024, state as follows:

1. The Company filed its Notice on November 1, 2024, pursuant to 20 CSR 4240-20.090(8)(D)1A.
2. Staff and OPC filed their respective responses to the Notice on November 26, 2024.
3. Staff indicated in its response (“Staff Response”) that it, “[D]oes not challenge the inclusion of the new SPP charge types.”<sup>1</sup>
4. OPC requested that the Commission deny the Company’s proposal to add six new SPP charge types, arguing that Evergy has not shown that the Uninstructed Resource Deviation (“URD”) cost covered by the new codes are a cost or revenues included in the Company’s fuel

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<sup>1</sup> See, Staff Response, p. 2, ¶5.

adjustment clause since they are new charge types recently initiated by SPP to discourage operators from deviating from dispatch instructions.

5. OPC's argument should be rejected as the new codes are related to current SPP costs. Historically, SPP included URD charges within the RT MWP Distribution charge type. Beginning in October 2024, SPP removed the URD charges from the RT MWP Distribution charge type and began listing it as its own charge type. Although these appear to be new SPP charge types, functionally they provide greater clarity than what was reflected in the RT MWP Distribution charge type.

6. OPC's position that the Company should wait until its next rate case to include these new SPP codes should also be rejected as the Commission's rules (20 CSR 4240-20.090(8)(D)1A) have a procedure which allows a utility to add new codes between rate cases. The Company has followed this procedure, and this case is the appropriate docket to add new SPP codes.

**WHEREFORE**, the Company submits its Reply to the Staff and OPC Responses for consideration by the Commission.

Respectfully submitted,

*/s/ Roger W. Steiner*

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**Attorneys for Evergy Missouri Metro and  
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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 counsel for all parties on this 11<sup>th</sup> day of December 2024, by either e-mail or U.S. Mail, postage prepaid.

*/s/ Roger W. Steiner*

Roger W. Steiner