

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

Ramey Chisum,)	
)	
Complainant,)	
)	<u>File No. EC-2025-0192</u>
v.)	
)	
Evergy Metro, Inc. d/b/a Evergy Missouri)	
Metro,)	
)	
Respondent.)	

STAFF’S REQUEST FOR DEADLINE EXTENSION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and requests the Commission’s Order extending the deadline for Staff’s Recommendation or other pleadings:

1. On December 31, 2024, Ramey Chisum filed a Complaint against Evergy Metro, Inc. d/b/a Evergy Missouri. On January 7, 2025,¹ the Commission issued its Order Giving Notice of Case Filing and Directing an Answer. The Commission issued its order that if any party believed the matter should not proceed under the small formal complaint procedure, that party might file a motion consistent with the Commission’s rule. No such motion has been filed. The Commission ordered Evergy Missouri to file any Answer to the Complaint no later than February 7. Evergy Missouri filed its Answer on that date.

2. Rule 20 CSR 4240.2.070 (15) (D) provides that the Commission Staff shall, within forty-five days after a complaint is filed, investigate the complaint and file a report

¹ All date references will be to 2025 unless otherwise indicated.

detailing its findings and recommendations. The rule provides that the regulatory law judge may allow additional time to complete its investigation for good cause shown. Although the rule mandates a “recommendation,” the rule also states that “Staff shall not advocate a position beyond reporting the results of its investigation.” The rule states: “If staff believes it should advocate a position, it may file a motion to change the status of the complaint under subsection (B) of this section.”

3. Section (B) provides:

If any party believes that a complaint should or should not be handled as a small formal complaint, that party may file a motion with the commission requesting that the status of the complaint be changed. In response to such motion, or acting on its own motion, the commission shall, at its discretion, decide how the complaint shall be handled.

4. Evergy Missouri filed its Answer on February 7. The Answer revealed information of which Staff was unaware and which Staff needs in order to complete its investigation and make the decisions and filings which the Rule requires and, specifically, which Staff needs in order to determine whether to advocate a position in this case and file the motion which the Commission’s Order and the rule’s’ Section (B) contemplate. Staff believes that it will need a 32-day deadline extension to perform its tasks and file the appropriate pleadings.

5. Because Staff did not receive the information required to conduct the investigation and make the determinations which the Rule requires until the Commission-ordered February 7 deadline for Evergy Missouri’s Answer, there exists good cause to extend the Rule 20 CSR 4240.2.070 (15) (D) deadline.

WHEREFORE, Staff prays the Commission's Order extending the Staff's pleading deadline to March 18, 2025, and for other such orders as the Commission may deem necessary and proper.

Respectively Submitted,

/s/ Paul T. Graham

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this February 13, 2025.

/s/ Paul T. Graham