

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

In the Matter of the Application of Evergy)	
Metro, Inc. d/b/a Evergy Missouri Metro and)	
Evergy Missouri West, Inc. d/b/a Evergy)	<u>Case No. EU-2021-0283</u>
Missouri West for an Accounting Authority)	
Order Allowing the Companies to Record)	
and Preserve Costs Related to the February)	
2021 Cold Weather Event)	

**MOTION TO SUSPEND
FILING OF PROPOSED PROCEDURAL SCHEDULE**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and in response to the Missouri Public Service Commission’s March 22, 2022 *Order Directing the Filing of a Proposed Procedural Schedule* files a *Motion to Suspend Filing of Proposed Procedural Schedule*¹ in this matter, and, in support thereof, hereby states:

1. The issues and the requests in this case that apply to Evergy Missouri West’s Winter Storm Uri costs and revenues should be held in abeyance pending the resolution of Evergy Missouri West’s Securitization Petition, No. EF-2022-0155.² That proceeding concerns the same Winter Storm Uri costs and revenues that are at issue in this proceeding.

2. The issues and requests in this case that apply to Evergy Missouri Metro (“Metro”) have now been limited to the Missouri-Kansas jurisdictional allocations issue, given the Commission’s recent decision relating to Metro’s fuel adjustment clause.³

¹ The March 22 order directed Staff to file a proposed procedural schedule on behalf of the parties no later than April 15, 2022.

² Petition for a Financing Order, In re Evergy Mo. West, Inc. Petition for a Financing Order Authorizing the Financing of Extraordinary Storm Costs, No. EF-2022-0155 (filed Mar. 11, 2022).

³ See Report & Order, In re Evergy Metro, Inc. for Auth. to Implement Rate Adjustments under its Fuel and Purchased Power Cost Recovery Mechanism, No. ER-2022-0025 (Mar. 26, 2022).

3. Metro has requested an Accounting Authority Order in this case that would defer amounts resulting from the current jurisdictional allocation methodology. Because that is the sole issue in this proceeding related to Metro, the parties agree that all jurisdictional allocation issues should be addressed in the pending Metro rate case (Case No. ER-2022-0129), and that the revenues and costs related to these issues should be deferred to that case.

4. As such, the only remaining issues and requests in this matter would be those of Evergy Missouri West, and they would be held in abeyance until the Securitization Petition proceeding has concluded. The deadline for an order in Case No. EF-2022-0155 is October 12, 2022.

5. Counsel for Evergy Missouri West and Evergy Missouri Metro, Office of the Public Counsel, and Intervenors have been contacted regarding this motion and consent to the suspension of filing a proposed Procedural Schedule in this case.

6. This motion is made in the interest of justice and not with the intent to unreasonably delay or hinder these proceedings in any manner.

WHEREFORE, Staff prays that the Commission will accept this *Motion to Suspend Filing of Proposed Procedural Schedule*; will issue an order in accordance with this *Motion*; and grant such other and further relief as the Commission considers just and reasonable in the circumstances.

Respectfully submitted,

/s/ Carolyn H. Kerr

Carolyn H. Kerr

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 12th day of April, 2022, to all counsel of record.

/s/ Carolyn H. Kerr