

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

In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri)
Metro Request for Variance of 20 CSR 4240-3.175) File No. EE-2021-0423
)

In the Matter of Evergy Missouri West, Inc. d/b/a Evergy)
Missouri West Request for Variance of 20 CSR 4240-3.175) File No. EE-2021-0424
)

**EVERGY MISSOURI METRO’S AND EVERGY MISSOURI WEST’S
MOTION FOR REHEARING/RECONSIDERATION**

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) (collectively “Evergy” or the “Company”) and submits their *Motion for Rehearing/Reconsideration* (“Motion”) to the Missouri Public Service Commission (“Commission”), pursuant to 20 CSR 4240-2.160 and, in support thereof, states as follows:

MOTION FOR REHEARING/RECONSIDERATION

1. On August 4, 2021, the Commission issued its *Order Granting Variance* (“Order”) wherein it:

The Commission grants Evergy requests for variance from Rule 20 CSR 5250-3.175(1)(B), subject to the condition that Evergy shall submit depreciation studies, databases and property unit catalogs to the Commission’s Energy Department and the Office of the Public Counsel as soon as they are final and, in any event, no later than October 1, 2021.¹

2. Evergy regrets having to file variance requests in order to file its depreciation studies. The Company was focused on aligning the depreciation study with Evergy’s upcoming rate cases and inadvertently missed the filing deadlines set by Commission rule. Evergy appreciates the Commission’s grant of the requested variance. However, due to several factors,

¹ See, *Order*, Ordering ¶2, p. 4.

the Company is not able to meet the October 1, 2020 deadline set by the Commission for the filing of the depreciation studies and property unit catalogs. First, the depreciation studies are based on a June 30, 2021 test period in order to align with the anticipated test year in the upcoming rate cases in January 2022. This end of June balance information was not final until mid- July and the Company's accounting department is now in the process of compiling the June information in order to send it to the Company's depreciation consultant in mid-August. The study will need to be prepared by the depreciation consultant and reviewed by the Company before it can be filed and this process will take several months. However, the Company can comply with the Staff's recommendation that the depreciation studies be filed not later than its January 2022 rate cases.

3. The Company believes that no harm will come to Staff or any other potential interested party by the Commission's extension of the October 1 due date to the date of the January 2022 rate cases as the January 2022 rate cases will fully address the contents of the depreciation studies.

4. Evergy requests the Commission issue an order extending the deadline for submitting the depreciation studies and property unit catalogs to the Commission to the date of its January 2022 rate cases. Such an order would be consistent with Staff's July 21, 2021 recommendation in this case (p.8). Should the depreciation study be completed and reviewed before the date of the rate case filings, the Company will file the materials with the Commission earlier.

WHEREFORE, for the foregoing reasons, the Company respectfully requests the Commission grant its Motion and issue an order extending the due date for submission of the Studies and related documentation.

Respectfully submitted,

/s/ Roger W. Steiner

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**ATTORNEY FOR EVERGY MISSOURI
METRO AND EVERGY MISSOURI WEST**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand delivered, emailed or mailed, postage prepaid, this 19th day of August 2021, to counsel for Staff for the Commission and the Office of the Public Counsel.

/s/ Roger W. Steiner

Roger W. Steiner