

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

In the Matter of the Application of Evergy)
Missouri West, Inc. d/b/a Evergy Missouri)
West for Permission and Approval of)
Certificates of Convenience and Necessity)
Authorizing It to Construct, Install, Own)
Operate, Manage, Maintain, and Control)
Two Solar Generation Facilities)

File No. EA-2024-0292

**STAFF’S RESPONSE TO EVERGY MISSOURI WEST’S RESPONSE TO STAFF’S MOTION
FOR EXTENSION AND TO THE COMMISSION’S SUA SPONTE ORDER GRANTING
STAFF’S MOTION FOR EXTENSION OF TIME**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and for its *Response to Evergy Missouri West’s Response to Staff’s Motion for Extension and to the Commission’s Sua Sponte Order Granting Staff’s Motion for Extension of Time* respectfully states as follows:

1. On October 25, 2024, Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“EMW”) filed an application with the Commission (“Commission”), pursuant to Section 393.170 RSMo., requesting certificates of convenience and necessity (“CCN”) authorizing EMW to construct, install, own, operate, manage, maintain, and control two solar generating facilities in Wilson County, Kansas (“Sunflower Sky”) and Jasper County, Missouri (“Foxtrot”).

2. The Commission issued its *Order Directing Notice, Setting Intervention Deadline, and Directing Staff Recommendation* on October 30, 2024, directing Staff to file a recommendation or, in the alternative, a status report stating when it expects to file a recommendation. The Commission directed Staff to make such a filing no later than December 16, 2024. Staff requested, and the Commission approved, March 17, 2025 as the date for the filing of Staff’s recommendation regarding this matter.

3. On March 14, 2025, Staff filed its *Motion for Extension*, explaining that EMW has informed Staff of material facts affecting Staff’s analysis of the Sunflower Sky project. Staff requested additional time in which to complete its recommendation due to this new information being reported to Staff only 18 days before Staff’s March 17, 2025 filing date for its recommendation.

4. Also on March 14, 2025, the Commission found Staff's request reasonable and granted an extension through April 17, 2025, for Staff to file a recommendation regarding EMW's application or a status report stating when it expects to file a recommendation.

5. On March 19, 2025, EMW filed its *Response to Staff's Motion for Extension and to the Commission's Sua Sponte Order Granting Staff's Motion for Extension of Time*, stating in part that EMW "respectfully requests that the Commission deny Staff's second request for a lengthy extension of time and instead require Staff to file its recommendation in this matter on or before April 7, 2025."

6. Also on March 19, 2025, the Commission issued its *Order Directing Expedited Staff Response*, which ordered Staff to file a response to EMW's *Response to Staff Motion for Extension and to the Commission's Sua Sponte Order Granting Staff's Motion for Extension of Time* no later than March 24, 2025.

7. Staff reiterates that on February 27, 2025, EMW informed Staff of new information regarding the Sunflower Sky project, Staff pursued discovery regarding that development, and Staff discussed the possibility of separating the projects - with Staff filing a recommendation on March 17 that would only cover Foxtrot. However, it was decided to keep the projects together rather than seek an extension only for Staff's recommendation regarding Sunflower Sky.

8. Staff's request for additional time in which to file a recommendation is not a lengthy extension of time; rather, it is only 10 days from the date on which EMW suggests Staff be required to file.

9. Additionally, Staff believes it is in the Commission's best interest to ensure that Staff has adequate time to provide the most complete recommendation possible. Staff recognizes EMW's desire to have Staff file its recommendation on or before April 7, 2025, and Staff will endeavor to file its recommendation sooner if at all possible. However, Staff nevertheless requests the Commission uphold its March 14, 2024, order finding that Staff's request is reasonable and which grants until April 17, 2025, for Staff to file a recommendation regarding EMW's application or a status report stating when it expects to file a recommendation.

WHEREFORE, Staff respectfully submits this *Response to Evergy Missouri West's Response to Staff's Motion for Extension and to the Commission's Sua Sponte Order Granting Staff's Motion for Extension of Time*, and requests the Commission uphold its order directing Staff to submit its recommendation no later than Thursday, April 17, 2025.

Respectfully submitted,

/s/ Travis J. Pringle

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**Attorneys for the Staff of the
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to all parties and/or counsel of record this 24th day of March, 2025.

/s/ Travis J. Pringle