

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

In the Matter of the Application of)
KCP&L Greater Missouri Operations Company)
For Approval of a Special Rate for a Facility) File No. EO-2019-0244
Whose Primary Industry is the Production or)
Fabrication of Steel in or Around Sedalia, Missouri.)

**EVERGY MISSOURI WEST’S RESPONSE TO
MECG’S MOTION TO REJECT TARIFFS**

COMES NOW, Evergy Missouri West, Inc. d/b/a Evergy Missouri West (f/k/a KCP&L Greater Missouri Operations Company) (“Evergy MO West” or the “Company”)¹, and for its Response to Midwest Energy Consumers Group (“MECG”) *Motion to Reject Tariffs* (“Motion”) filed in this matter on December 9, 2019, as follows:

1. MECG is mistaken when it alleges that the Missouri Public Service Commission (“Commission”) would abdicate its authority by approving the SIL tariff. The terms of the SIL tariff clearly defines that if any future industrial customers were to request service under the SIL tariff, the Commission must approve the SIL rates for those customers before they become effective. Even though MECG earlier indicated weeks ago that it did not oppose the *Non-Unanimous Stipulation and Agreement* filed in this docket on September 19, 2019 (which contained the SIL tariffs which the Company is trying to get approved), MECG now makes another last-ditch effort to prevent the SIL rate from becoming effective. MECG wants the Commission to reject the SIL tariff under which Nucor Steel Sedalia, LLC, a Division of Nucor Corporation (“Nucor”) is expecting to take service on January 1, 2020 by arguing that it takes away from the Commission’s future authority.

¹ Effective October 7, 2019, Evergy Missouri West, Inc. d/b/a Evergy Missouri West adopted the service territory and tariffs of KCP&L Greater Missouri Operations Company.

2. Evergy MO west tariff sheet 157.1 states that at least 60 days prior to the effective date of the Special Incremental Load Rate Contract, the Company will file the individual Special Incremental Load Rate Contract and supporting documentation with the Commission for approval. MECG's argument that approval of the SIL tariff sidesteps the Commission's future authority concerning other large users who may wish to use the SIL tariff is incorrect and therefore, MECG's motion should be rejected by the Commission.

WHEREFORE, the Company respectfully submits its Response to MECG's Motion and requests that the Commission approve the Nucor Agreement and the Company's SIL Tariff, with the additional customer protections contained in the Stipulation filed on September 19, 2019.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorneys for Evergy Missouri West, Inc.
d/b/a Evergy Missouri West (f/k/a KCP&L
Greater Missouri Operations Company)**

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 December 2019, to all counsel of record.

/s/ Roger W. Steiner

Roger W. Steiner