

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

In the Matter of the Fourth Prudence)
Review of Costs Subject to the)
Commission-Approved Fuel Adjustment) Case No. EO-2022-0064
Clause of Evergy Metro, Inc. d/b/a Evergy)
Missouri Metro)

In the Matter of the Tenth Prudence)
Review of Costs Subject to the)
Commission-Approved Fuel Adjustment) Case No. EO-2022-0065
Clause of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West)

**EVERGY MISSOURI METRO’S AND EVERGY MISSOURI WEST’S
REQUEST FOR HEARING**

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, the “Company”) and hereby submit their *Request for Hearing* and, in support thereof, state as follows:

1. On February 28, 2022, following its 4th prudence review related to the fuel adjustment clause (“FAC”) for Evergy Missouri Metro, Staff (“Staff”) for the Missouri Public Service Commission (“Commission”) filed its 4th *Prudence Review of Costs Related to the Fuel Adjustment Clause* related to Evergy Missouri Metro (“Metro Staff Report”) in this proceeding, as required by Commission Rule 20 CSR 4240-20.090(11) and Missouri Revised Statute 16 Section 386.266.5(4). The Metro Staff Report identifies:

[E]vidence of imprudence by Evergy Missouri Metro when Evergy Missouri Metro failed to take any action that would have allowed it to generate revenue from the sale of 1,153,813 renewable energy credits (“RECs”) that were not needed to satisfy its RES compliance and simply allowed them to expire during the Review Period. Staff

recommends the Commission order an Ordered Adjustment (“OA”) in the amount of \$3,922,964.”¹

2. Also, on February 28, 2022, following its 10th prudence review related to the fuel adjustment clause (“FAC”) for Evergy Missouri West, Staff for the Commission filed its *10th Prudence Review of Costs Related to the Fuel Adjustment Clause* related to Evergy Missouri Metro (“Metro Staff Report”) in this proceeding, as required by Commission Rule 20 CSR 4240-20.090(11) and Missouri Revised Statute 16 Section 386.266.5(4). The West Staff Report identifies:

[E]vidence of imprudence by Evergy Missouri West when Evergy Missouri West failed to take any action that would have allowed it to generate revenue from the sale of 79,994 renewable energy credits (“RECs”) that were not needed to satisfy its RES compliance and simply allowed them to expire during the Review Period. Staff recommends the Commission order an Ordered Adjustment (“OA”) in the amount of \$271,980.”²

3. The Company disputes the Staff’s alleged disallowances. Consequently, and in compliance with Commission Rule 20 CSR 4240-20.090(11)B, the Company hereby requests a hearing regarding the Metro Staff Report and West Staff Report. In addition, the Company asks the Commission to promptly set a prehearing conference so that the parties can develop a recommended procedural schedule for this case.

WHEREFORE, the Company respectfully requests a hearing regarding the Staff Report(s) and asks that the Commission promptly schedule a prehearing conference so that a procedural schedule may be developed.

¹ See, *Metro Staff Report*, p. 2, Ins. 14-99, Docket No. EO-2022-0064.

² See, *West Staff Report*, p. 2, Ins. 18-20 through p. 3 Ins. 1-2, Docket No. EO-2022-0065.

Respectfully submitted,

/s/ Roger W. Steiner

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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, to the Staff of the Commission and to the Office of the Public Counsel this 7th day of March 2022.

/s/ Roger W. Steiner

**Attorney for Evergy Missouri Metro and
Evergy Missouri West**