

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

In the Matter of the Establishment of a )  
Collaborative Working Case Dedicated to )  
Reviewing the Consolidation of Jurisdictions )  
of Evergy Metro, Inc. d/b/a Evergy Missouri )  
Metro and Evergy Missouri West, Inc. d/b/a )  
Evergy Missouri West )

Case No. EW-2025-0220

**THE OFFICE OF THE PUBLIC COUNSEL’S QUESTIONS FOR DISCUSSION AT THE  
FIRST WORKSHOP**

**COMES NOW** the Office of the Public Counsel (the “OPC”) and respectfully submits its questions for discussion at the first workshop to Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) and Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Metro” and collectively with Evergy Missouri West, “Evergy”). In support, the OPC states:

1. As a part of the Stipulation and Agreement to resolve Evergy Missouri West’s most recent rate case, Case No. ER-2024-0189, Evergy Missouri West agreed to “open a new Commission non-contested docket dedicated to reviewing the consolidation of Evergy Missouri Metro and [Evergy Missouri West].” (Unanimous Stip. & Agr. 5, Doc. 264, Case No. ER-2024-0189). The parties to that Stipulation and Agreement agreed that as part of the new docket, Evergy Missouri West would participate in “at least three workshops” that “will entail the Company updating the Commission, Staff, OPC, and other stakeholders as to the progress it has made up to that point on consolidation of [Evergy Missouri West] and Evergy Missouri Metro.” (*Id.*). Further, Evergy Missouri West agreed that it would “respond to questions and seek input from the Commission and stakeholders.” (*Id.*). Evergy Missouri West also agreed to request an on the record presentation before the Public Service Commission of the State of Missouri (the “Commission”) “to present what

it considers to be the most important consolidation issues that need to be addressed and to solicit initial input from the Commission and interested stakeholders.” (*Id.* 5-6).

2. On February 11, 2025, Evergy filed a Motion to Open a New Docket Dedicated to Reviewing Consolidation of Jurisdictions, seeking to establish a new docket to fulfill the requirement of the Stipulation and Agreement from Case Number ER-2024-0189. (Doc. 1).
3. On March 12, 2025, the Commission granted Evergy’s request and scheduled an on-the-record presentation for May 20, 2025. (Doc. 2).
4. On May 20, 2025, Evergy presented at an on-the-record presentation before the Commission. In doing so, it showed a PowerPoint and provided each of the Parties in attendance a printed copy of the PowerPoint.
5. The OPC appreciates Evergy’s presentation at the on-the-record presentation, as well as its willingness to address stakeholders’ questions. The OPC looks forward to thorough and thought-provoking conversations during the upcoming workshops.
6. Evergy’s on-the-record presentation has raised several questions for the OPC. To ensure that Evergy has time to consider and formulate complete answers to these questions, the OPC is filing those questions in advance of the first workshop. The OPC also reserves the right to raise additional questions before, during, and after each of the upcoming workshops.
7. The OPC’s current questions are:
  - a. Please identify all differences in current workload between Evergy Metro and Evergy Missouri West employees.
    - i. In regards to those employees who do work for both Evergy Metro and Evergy Missouri West, please identify all differences in workload between the two entities for each employee and generally.

- ii. Please identify all instances where identical or substantially similar work is being done separately by employees of Evergy Metro and Evergy Missouri West and explain why this separation is necessary.
- b. Please identify all employees who are tasked with analyzing the consolidation information.
- c. Please provide Evergy's definition of "jurisdictional" and "jurisdictional consolidation."
- d. Please identify and explain all differences Evergy sees in the terms "jurisdiction" and "rate district."
- e. Please identify and explain if the Company believes it is possible to achieve consolidation within Missouri without needing to separate Evergy Metro into two distinct legal entities (between Kansas and Missouri). If the Company does not believe this is possible, please explain why Evergy Metro must be legally separated between Missouri and Kansas to achieve consolidation in Missouri.
- f. Please identify any cost-of-service differences that Evergy calculates would arise if Missouri rates are consolidated, broken down by rate class.
- g. Please identify the jurisdictions that Evergy sees as possible outcomes of potential consolidation.
  - i. In doing so, please identify and explain all terms Evergy uses to describe the consolidation(s) (*i.e.* would the consolidation of Evergy Missouri West with Evergy Metro (without splitting Evergy Metro between Kansas and Missouri) be considered "rate jurisdiction" consolidation<sup>1</sup> or something else?).
- h. Please identify all current outstanding debt instruments for each utility operating company.
- i. For any type of consolidation to occur, please identify all necessary approvals required for each outstanding debt instrument identified in response to question 7(h).
- j. Has Evergy engaged the Kansas Corporation Commission to determine its view of potential consolidation and/or legal restructuring to disaggregate Evergy's subsidiaries according to state jurisdiction (*i.e.* Evergy Missouri (to include all Missouri electric utility operations) and Evergy Kansas (to

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<sup>1</sup> The OPC offers this only as an example of an answer that Evergy may identify in response to this question. It reflects the OPC's current understanding of the terms used and may not accurately reflect Evergy's response.

include all Kansas electric utility operations)))? If so, please provide materials/information exchanged.

- k. Please explain how the securitization charge currently being paid by Evergy Missouri West's customers as a result of the Commission's Order in Case Number EF-2022-0155 would be impacted by each of the following:
  - i. Consolidation of Evergy Missouri West with Evergy Metro (without splitting Evergy Metro between Kansas and Missouri); and
  - ii. Consolidation of Evergy Missouri West with Evergy Metro (after splitting Evergy Metro between Kansas and Missouri).
- l. On slide 17, Evergy mentions that legal consolidation is required to conduct joint resource planning. Specifically, Evergy states "Enables Evergy to perform its integrated resource planning on a statewide basis, rather than OpCo by OpCo." Please explain what is currently preventing Evergy from performing its integrated resource planning in Missouri on a Evergy Metro and Evergy Missouri West consolidated basis, while it submits combined capacity to the Southwest Power Pool ("SPP").
- m. On slide 17, Evergy identifies "purchasing economies of scale" as one of the potential benefits of legal entity consolidation.
  - i. Please identify the current procurement process in light of the shared service company, Evergy Services, Inc.
  - ii. Please identify what goods or services are being procured on an individual legal entity basis versus those procured on a consolidated basis through the use of Evergy's shared service company, Evergy Services, Inc.
  - iii. Please explain how legal entity consolidation would further promote "purchasing economies of scale" in light of the shared service company.
- n. On slide 17, Evergy identifies "simplified corporate structure" as one of the potential benefits of legal entity consolidation. Please identify all estimated cost savings that customers could see as a result of this potential benefit and how those cost estimates were derived.
- o. On slide 21, Evergy uses the term "half measures." Please define "half measures" and provide at least five examples.
- p. Please provide, in native executable Excel form, all workpapers that support the chart showing "Make-Whole Premiums and PV of Interest Cost/(Benefit)" included on slide 22.

- q. Slide 22 indicates Evergy’s subsidiaries may need to obtain bondholder consent to modify indentures (if required). Please identify all bonds in which Evergy’s subsidiaries will need to obtain bondholder consent and what would cause the need or not to modify indentures.
- r. On slide 23, Evergy identifies “Existing Rate Differentials Between Service Areas in Each State” as one of the key challenges to rate jurisdictional consolidation. Can this challenge be avoided by filing a rate case as a Missouri-consolidated entity (*i.e.* Evergy Metro consolidated with Evergy Missouri West)?
  - i. The OPC believes this would be similar to the consolidation of St. Joseph Power & Light with Kansas City Power & Light Greater Missouri Operations Company; a consolidation with which Evergy should be familiar.
    - 1. Please identify what differences exist between that consolidation and the consolidation of Evergy Metro with Evergy Missouri West (including the scenario of splitting Evergy Metro between Kansas and Missouri and not doing so).
    - 2. Please identify any other “lessons learned” from the consolidation of St. Joseph Power & Light with Kansas City Power & Light Greater Missouri Operations Company.
- s. On slide 24, Evergy states “Billing system capabilities may need to be enhanced to accommodate new billing practices or bill impact mitigation approaches.”
  - i. Please identify what “billing system capabilit[y]” differences currently exist for each of the distinct Evergy legal entities.
  - ii. For any differences identified in subpart (i), please explain why these differences exist.
  - iii. If a common billing system is not used for all of Evergy, Inc.’s legal utility entities, please explain why.
  - iv. Please identify any new billing practices that Evergy contemplates as a result of a potential consolidation.
  - v. Please identify any “bill impact mitigation approaches” Evergy contemplates as a result of a potential consolidation.

*[Continued on next page]*

WHEREFORE, the OPC respectfully requests that the Commission accept these Questions for filing in this docket.

Respectfully submitted,

/s/ Lindsay VanGerpen  
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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the forgoing will be emailed to all counsel of record this 3rd day of June 2025.

/s/ Lindsay VanGerpen