

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

In the Matter of the Application of Evergy)
Metro, Inc. d/b/a Evergy Missouri Metro)
and Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West for Approval of New)
and Modified Tariffs for Service to Large)
Load Customers)

File No. EO-2025-0154

**JOINTLY PROPOSED LIST OF ISSUES, ORDER OF OPENING STATEMENTS,
LIST AND ORDER OF WITNESSES, AND ORDER OF CROSS-EXAMINATION**

COMES NOW, the Staff of the Missouri Public Service Commission, on behalf of itself and the parties to this docket, and hereby submits its proposed *List of Issues, Order of Opening Statements, List and Order of Witnesses, and Order of Cross-Examination* in accordance with the Procedural Schedule set for the above-captioned proceeding. In preparing this list of issues, the parties attempted to list all contested issues, and attempted to obtain consensus on the descriptions of the issues. Not all of the parties agree with the wording or inclusion of all of the issues set out herein. The inclusion of an issue in the list does not mean that all parties agree with the characterization of the issue or that the matter identified is actually in dispute and/or that a Commission decision on the issue is proper or necessary in this case.

I. List of Issues

- A. Should the Commission adopt Evergy's or Staff's conceptual tariff, rate structure, and pricing in order to comply with Mo. Rev. Stat. Section 393.130.7?
- B. Can the Commission establish terms and conditions to exclude otherwise eligible customers from receiving EDR discounts?
- C. What should be the threshold demand load in megawatts ("MW")/criteria for a large load power service ("LLPS") customer to receive service under a Commission approved LLPS tariff?
 - a. To the extent the threshold captures existing customers, should a grandfathering provision for such customer be adopted?

- D. What other existing programs and riders should or should not be available to LLPS customers, if any?
- E. Should the LLPS customer bear reasonability for its interconnection and related non-FERC transmission infrastructure costs?
 - a. How should such interconnection and related non-FERC transmission infrastructure costs be accounted for or tracked, if at all?
- F. What minimum term of service should be required for a LLPS customer to receive service under the Commission approved LLPS tariffs?
- G. What collateral or other security requirements should be required for a LLPS customer to receive service under the Commission approved LLPS tariffs?
- H. What termination fee (exit fee) provision should a LLPS customer be subject to under the Commission approved LLPS tariffs?
- I. Should any limit be placed on Evergy concerning the amount of LLPS load that it may serve?
- J. Should the Commission approve Evergy's "Path to Power" approach?
 - a. What components of the proposed "Path to Power," if any, should be included in the Commission's approved tariff sheets?
- K. Are changes needed for the Emergency Energy Conservation Plan tariff sheet and related tariff sheets to accommodate LLPS customers?
- L. What studies should be required for customers to take service under the LLPS tariff?
- M. Should a form customer service agreement be included in the Commission approved LLPS tariffs resulting from this case?
- N. Should Evergy be required to disclose information about prospective customers?
 - a. If so, what review should the Commission have of prospective customers and terms applicable to specific customers?
 - b. In what case should said review occur?
- O. Should LLPS customers be included in the FAC?
 - a. What, if any, changes should be made to Evergy's existing FAC tariff sheet?
 - b. When/in what case should these changes be made?
 - c. What if any FAC related costs should the Commission order tracked?
- P. Should LLPS customers be registered with a separate Southwest Power Pool ("SPP") commercial pricing node (subject to SPP support) or alternatively should Evergy be required to provide the Staff-recommended data (Appendix 2, Schedule 2) node?
- Q. Should LLPS customers be a subclass of Evergy's Large Power Service ("LPS") or be a stand-alone class?

- R. What treatment is needed to address revenues from LLPS customers occurring between general rate cases?
- S. Should the Commission approve the Evergy System Support Rider or take other steps to address cost impacts to non-LLPS customers?
- T. Should the proposed additional riders, be authorized by the Commission at this time
 - a. The Customer Capacity Rider?
 - b. The Demand Response & Local Generation Rider?
 - c. The Renewable Energy Program Rider?
 - d. The Green Solution Connections Rider?
 - e. The Alternative Energy Credits Rider?
 - f. The Clean Energy Choice Rider?
- U. Should the Commission order a community benefits program as described in the testimony of Dr. Geoff Marke?

II. Order of Opening Statements

Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (collectively “Evergy”)
Staff of the Missouri Public Service Commission
Union Electric Company d/b/a Ameren Missouri
The Empire District Electric Company d/b/a Liberty¹
Google LLC
Data Center Coalition
Nucor Steel Sedalia, LLC
Velvet Tech Services, LLC
Sierra Club
Renew Missouri
Office of the Public Counsel

III. List and Order of Witnesses

Kevin D. Gunn (Evergy)
Jason Klindt, adopting the testimony of Jeff Martin (Evergy)
Derek Brown (Evergy)
Bradley D. Lutz (Evergy)
Jim Busch (Staff)
Shawn Lange (Staff)
Michael L. Stahlman (Staff)
Brooke Mastrogiannis (Staff)

¹Liberty filed its Motion to Intervene Out of time on August 20, 2025, and was assigned Exhibit Nos. 750-799 in the Commission’s September 10, 2025, Order Setting Blocks of Exhibit Numbers.

Jordan Hull (Staff)²
Brad Fortson (Staff)³
Amanda Arandia (Staff)⁴
Brodrick Niemeier (Staff)
Claire Eubanks (Staff)
J Luebbert (Staff)
Sarah Lange (Staff)
Robert B. Dixon (Ameren Missouri)
Ajay K. Arora (Ameren Missouri)
Steven M. Wills (Ameren Missouri)
Carolyn A. Berry (Google LLC)
Kevin C. Higgins (Data Center Coalition)
Shana Ramirez (Data Center Coalition)
Jessica Polk Sentell (Renew Missouri)⁵
Lena Mantle (OPC)
Geoff Marke (OPC)

IV. Order of Cross-Examination

Everygy Witnesses

Ameren Missouri
Liberty
Google LLC
Data Center Coalition
Nucor Steel Sedalia, LLC
Velvet Tech Services, LLC
Sierra Club
Renew Missouri
Staff of the Missouri Public Service Commission
Office of the Public Counsel

Staff of the Missouri Public Service Commission Witnesses

Office of the Public Counsel
Nucor Steel Sedalia, LLC
Velvet Tech Services, LLC
Data Center Coalition
Google LLC
Sierra Club
Renew Missouri
Ameren Missouri
Liberty
Everygy

² This witness is unavailable on Friday, October 3, and may be called out of order before that date if needed.

³ This witness is unavailable on Friday, October 3, and may be called out of order before that date if needed.

⁴ This witness is unavailable on Friday, October 3, and may be called out of order before that date if needed.

⁵ This witness will be available on Wednesday, October 1, and Thursday, October 2, 2025.

Union Electric Company d/b/a Ameren Missouri Witnesses

Liberty
Energys
Renew Missouri
Nucor Steel Sedalia, LLC
Velvet Tech Services, LLC
Google LLC
Data Center Coalition
Sierra Club
Office of the Public Counsel
Staff of the Missouri Public Service Commission

Google LLC Witness

Data Center Coalition
Velvet Tech Services, LLC
Nucor Steel Sedalia, LLC
Liberty
Renew Missouri
Sierra Club
Ameren Missouri
Energys
Office of the Public Counsel
Staff of the Missouri Public Service Commission

Data Center Coalition Witnesses

Google LLC
Velvet Tech Services, LLC
Nucor Steel Sedalia, LLC
Renew Missouri
Sierra Club
Liberty
Ameren Missouri
Energys
Office of the Public Counsel
Staff of the Missouri Public Service Commission

Renew Missouri Witness

Sierra Club
Energys
Ameren Missouri
Liberty
Google LLC
Data Center Coalition
Nucor Steel Sedalia, LLC
Velvet Tech Services, LLC

Office of the Public Counsel
Staff of the Missouri Public Service Commission

Office of Public Counsel Witnesses

Staff of the Missouri Public Service Commission
Data Center Coalition
Nucor Steel Sedalia, LLC
Velvet Tech Services, LLC
Google LLC
Sierra Club
Renew Missouri
Liberty
Ameren Missouri
Evergy

Respectfully submitted,

/s/ Travis J. Pringle

Travis J. Pringle
Chief Deputy Counsel
Missouri Bar No. 71128

Alexandra Klaus
Senior Counsel
Missouri Bar. No. 67196

Andrea Hansen
Associate Counsel
Missouri Bar No. 73737
200 Madison Street
P.O. Box 360
Jefferson City, Missouri 65102
Phone: (573) 751-5700
Fax: (573) 526-1500
E-mail: Travis.Pringle@psc.mo.gov

**Attorneys for the Staff of the
Missouri Public Service Commission**

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 18th day of September, 2025.

/s/ Travis J. Pringle