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Chief Judge Nancy Dippell
Chief Regulatory Law Judge and Secretary
Missouri Public Service Commission
Governor Office Building
200 Madison Street
Jefferson City, MO 65101

Re: In re Proposed Amendments of the Commission's Rules Relating to Chapter 4 – Standards of Conduct, No. OX-2026-0335 — Evergy's Proposed Edits to Staff's Proposed Revisions

Dear Chief Judge Dippell:

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, "Evergy" or the "Company") respectfully submit the following proposed edits to Staff of the Missouri Public Service Commission's ("Staff") proposed rule revisions to Chapter 4 – Standard of Conduct, filed on June 12, 2026.

In these comments, Evergy is providing its response to Staff's proposed rule revisions. Additionally, Evergy is providing comments on other rules within Chapter 4 for the Commission's consideration, as the Company believes it is appropriate to address certain broader concerns at this time.

Definition of "Commission Staff" (20 CSR 4240-4.015(4)): Staff has proposed to revise the definition of "Commission staff" to mean "all personnel employed by the commission whether on a permanent or contractual basis who are not members of the general counsel division, administration division, technical advisory staff, personal advisors, or who are not law judges." In OX-2026-0334, Staff indicated that a similar proposed definitional change in Chapter 3 was intended to exclude the Bulk Regional Transmission Unit. Evergy does not have a concern with that group being treated as part of the technical advisory staff for purposes of the Ex Parte Rule. However, it may be helpful to outside stakeholders to have that spelled out in some way. Providing clarification in the definition will help stakeholders understand how to interact appropriately with the Bulk Regional Transmission Unit under the Ex Parte Rule.

In addition, because it is rare that Chapter 4 opens for changes, Evergy proposes a change for discussion:

General Provisions – Notice Requirements (20 CSR 4240-4.017(1)): Evergy proposes a change to the current Commission rule 20 CSR 4240-4.017(1) which requires that the notice of a forthcoming case filing “include a summary of all communication regarding substantive issues likely to be in the case between the filing party and the office of the commission that occurred in the ninety (90) days prior to filing the notice.”

Evergy proposes reducing the look-back period from ninety (90) days to thirty (30) days. The 90-day look-back is an outlier among neighboring states, including Nebraska, Iowa, Arkansas, and Kansas—none of which impose a comparable communication disclosure requirement. Missouri already requires a 60-day notice period prior to a case filing, which is longer than most neighboring states. Combined with the 90-day look-back, this effectively restricts substantive communication with the Commission for nearly half the year preceding a filing. A 30-day look-back period is just and reasonable, addresses the policy objectives underlying the rule, and brings the total disclosure window to 90 days when combined with the existing 60-day notice requirement.

Sincerely,

/s/ Roger W. Steiner

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