

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

In the Matter of Evergy Metro, Inc. d/b/a)
Evergy Missouri Metro’s Request for Authority) **Case No. ER-2022-0129**
to Implement A General Rate Increase for Electric)
Service)

In the Matter of Evergy Missouri West Inc. d/b/a)
Evergy Missouri West’s Request for Authorization to) **Case No. ER-2022-0130**
Implement A General Rate Increase for Electric)
Service)

**MOTION TO CORRECT TRANSCRIPT AND
MOTION FOR EXPEDITED TREATMENT**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and requests that certain portions of the hearing transcripts (Volumes 8 and 9) be corrected as reflected below. In support, Staff states:

1. These two particular transcripts were made from recordings of the hearing proceedings on September 1 and 2, 2022. The transcripts for Volume 8 and 9 were filed on September 27, 2022, and consists of 367 pages. This motion is filed within ten (10) days pursuant to Rule 20 CSR 4240-2.110(7).

2. In preparing its brief, Staff discovered a few errors that could potentially change the intent or meaning of the sworn testimony.

3. Staff has reviewed recordings for Thursday, September 1 and Friday, September 2 and replayed the recordings at sufficient volume to determine that the transcript should read as follows, with additions in bold, and subtractions in strikethrough. Transcript and recording citations are also noted next to the corrections.

Transcript Volume 8

p. 188, lines 1-5 (hearing timestamp 2:46:02-2:46:19)

MS. WHIPPLE: In the 2018 rate case, did you serve true-up discovery?

MR. MAJORS: I believe so. I was ~~not~~ involved in most, if not all, of the discovery in the entire 2018 and 2016 rate cases.

p. 191, line 8-17 (hearing timestamp 2:53:09-2:53:54)

MS. WHIPPLE: Yes, please. Where it says "Response."

MR. MAJORS: One and two and (for KCPL Greater Missouri Operations please see the attached spreadsheet below). Plant reserve data provided as of June 30, 2018. Production plant depreciation reserve is not maintained by individual generating unit except for Iatan unit 2. Depreciation reserve reported in DR data request 0027T has been allocated to each generating unit, except for Iatan unit 2. Response prepared by Larry Mulligan."

p. 220, line 2-12 (hearing timestamp 4:59:07-5:00:00)

MR. MAJORS: ...And by the same token, in comparison to Sibley, they still had a substantial net book value on the books. Now, that net book value for Montrose was not separately calculated by Mr. Spanos or any other depreciation expert. It would have been simply buried in the depreciation reserve. So that's kind of a -- it's a ~~contrast~~ **contrast** between where we are at Sibley because it had another 20 years of life left. Whereas Montrose, I don't believe did. Or at any time, or in the near past, those units were just

expected to be retired because of their age, efficiency, and the investment required to keep them running.

p. 243, line 6 – 12 (hearing timestamp 5:37:00-5:37:27)

JUDGE HATCHER: I'm sorry. Reallocation from the general to the specific generating units. Is that what you mean, reallocation?

MR. CUNIGAN: Yeah. So when Mr. Majors was talking, the plant balances for the individual FERC accounts are not ~~ties~~ **tied** to the unit or location, but the total balance for that FERC account would remain the same.

p. 253, line 20- p. 254, line 6 (hearing timestamp 5:56:03-5:56:55)

MR. CLIZER: So the company will earn a higher return, or rather the company will make more in the return on those remaining plants as a result of this.

MR. CUNIGAN: I think the issue you run into with that is that, again, the accounts aren't actually segregated. So when you look at the total account balance that remains the same. But because Sibley is being removed from that account balance, that's where you run into the issue. And I think I touched on that in my testimony that it is the timing of the reallocation that makes it seem **odd**. If this was done back in 2010, it wouldn't have been as big of an issue.

Transcript Volume 9

p. 406, line 2-6 (hearing timestamp 1:21:18-1:21:45)

Q. But do you disagree with that statement?

A. I guess depending on what he means by lower cost, I mean, lower ~~MNM~~ **O&M** cost is a potential, but we haven't seen actual demonstration that that has occurred.

p.416, line 22 – p. 417, line 4 (hearing timestamp 1:37:15-1:37:40)

Q. My question is: I used different numbers in my opening statement based upon what our understanding of the reconciliation shows; would the second reconciliation be the most current numbers?

A. The reconciliation includes the reserve adjustment, so yes, that's correct. That would be six percent essentially for GMO and ~~90~~ **9** percent for KCP&L. That's correct.

4. Undersigned counsel for Staff confirmed these corrections with the appropriate witnesses in writing. If requested, Staff will prepare a signed and notarized statement supporting the above corrections. In the interest of expediting the motion, Staff is filing this motion immediately.

5. Expedited treatment is needed to ensure all parties can rely on an accurate record and not further delay briefing. Ordering this correction allows the parties to cite to the corrected transcript if they wish.

WHEREFORE Staff requests an order reflecting these corrections. This motion is filed as soon as it could have after it was discovered that the transcript corrections were necessary.

/s/ Nicole Mers

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail or by U.S. Mail, postage prepaid, on October 6, 2022 to all counsel of record.

/s/ Nicole Mers