

**BEFORE THE MISSOURI 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) File No. EU-2020-0350
For an Accounting Authority Order Allowing the)
Companies to Record and Preserve Costs Related)
To COVID-19 Expenses)

**THE NATIONAL HOUSING TRUST’S OBJECTION TO
THE NON-UNANIMOUS STIPULATION AND AGREEMENT**

COMES NOW, the National Housing Trust (“NHT”) pursuant to the Commission’s rule 4 CSR 240-2.115(2)(B) and its October 9, 2020 *Order Setting Time for Objections*, and submits its objection to the October 8, 2020 *Non-Unanimous Stipulation and Agreement*” submitted in this case by Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. (“Evergy” or the “Company”), the Staff of the Missouri Public Service Commission (“Staff”), Missouri Industrial Energy Consumers (“MIEC”), Midwest Energy Consumers Group (“MECG”), and Sierra Club (“Sierra Club”) (collectively referred to as the “Signatories”). For its Objection, NHT states the following:

1. On October 8, 2020, the Signatories submitted the *Non-Unanimous Stipulation and Agreement* in this case. The Commission thereafter issued its *Order* that established October 15 as the deadline for objections.
2. With this filing, NHT formally objects to the Non-Unanimous Stipulation and Agreement and requests a hearing in this case.
3. Commission Rule 4 CSR 240-2.115(2)(D) requires that a “non-unanimous stipulation and agreement to which a timely objection has been filed shall be considered to be merely a position of the signatory parties to the stipulated position, except that no party shall be

bound by it. All issues shall remain for determination after hearing.” In addition, rule 4 CSR 240-2.115(2)(E) states that a party may indicate that it does not oppose all or parts of a non-unanimous stipulation and agreement.

4. For its part, NHT submitted the Rebuttal Testimony of Roger Colton that provided context for the economic and health consequences of the current COVID-19 pandemic, articulated the regulatory principles that should be applied to cost recovery, and suggested conditions that should be placed on Evergy’s proposed Authorized Accounting Order.

Specifically:

a. Mr. Colton’s testimony recommends proactive steps Evergy should take that can provide a path for Evergy to generate revenue and reduce costs relative to alternative approaches, so as to achieve a least-cost scenario.

b. Mr. Colton’s testimony contextualizes this case by highlighting low-income households’ struggles to adapt to an unprecedented economic and health disaster.

c. Mr. Colton’s testimony recommends actions to mitigate COVID-related arrearages, particularly for the most vulnerable customers. These steps include expanding the Economic Relief Pilot Program, creating a best-practice arrearage management program, establishing long-term deferred payment plans, and targeting these programs to the extreme poor.

d. Mr. Colton’s testimony also recommends suspension of disconnections for non-payment, elimination of late fees, and suspension of reconnection fees for the duration of the pandemic.

e. Mr. Colton’s testimony also recommends the public reporting of data, including additional metrics not included in paragraph 9 of the Non-Unanimous Stipulation and Agreement.

5. The *Non-Unanimous Stipulation and Agreement* fails to address these foregoing concerns, in addition to other concerns which NHT plans to address at the hearing.

WHEREFORE, the National Housing Trust submits this Objection to the October 8, 2020 *Non-Unanimous Stipulation and Agreement* submitted by the Signatories in this case.

Respectfully Submitted,

/s/ Andrew J. Linhares

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 15th day of October 2020:

/s/ Andrew J. Linhares