

Rachael Staude d/b/a
Grand Property Management KC,

Complainant,

V.

Evergy Metro, Inc. d/b/a Evergy Missouri Metro,

Respondent.

File No. EC-2021-0084

MOTION FOR EXTENSION OF TIME TO FILE REPORT

COMES NOW Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and respectfully states as follows:

1. On September 23, 2020 Complainant Rachael Staude filed a complaint with the Commission against Evergy Metro, Inc. ("Evergy"). The complaint suggests that the disputed accounts are in the name of Ms. Staude, as well as in the name of Grand Property Management KC. Only Ms. Staude signed the complaint. Under 20 CSR 4240-2.040(5), a natural person may only represent himself or herself and not another entity.

2. On September 25, 2020 the Commission ordered Evergy to respond to Ms. Staude's complaint by October 26, 2020 and for Grand Property Management KC to cure its deficient application and be represented by an attorney no later than October 26, 2020, or face dismissal. Also on September 25, 2020, the Commission issued an order directing Staff to file its report no later than November 9, 2020.

3. Staff submitted data requests (“DRs”) to Evergy on October 15, 2020, and Evergy responded on November 4, 2020. Staff is in the process of reviewing the responses and completing its investigation. There is a potential that Staff will need to submit follow up DRs to further its understanding of the information provided. In order to conduct follow up discovery and incorporate the information from all of the current and potential Evergy’s DR responses in its report, Staff requests an extension of time to December 10, 2020 to file its report. Staff will file it earlier, if possible.

4. Counsel exchanged emails with Roger Steiner, counsel for Evergy, who stated that he does not oppose this request.

5. At the time of this filing, counsel has not received a response from Ms. Staude.

6. No party would be prejudiced by this extension being granted.

WHEREFORE, Staff requests that the Commission grant it an extension of time to December 10, 2020 to file its report.

Respectfully submitted,

/s/ Nicole Mers

Nicole Mers

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

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to all parties and/or counsel of record on this 6th day of November, 2020.

/s/ Nicole Mers