

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

In the Matter of the Application of Evergy)
Missouri West, Inc. d/b/a Evergy Missouri)
West for Permission and Approval of)
Certificates of Convenience and Necessity)
Authorizing It to Construct, Install, Own)
Operate, Manage, Maintain, and Control)
Two Solar Generation Facilities)

File No. EA-2024-0292

**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 parties agree that the issues below are issues to be decided in this case. However, to avoid the need to file multiple lists of issues, the parties have agreed to include all issues in this list, whether agreed to or not.

I. List of Issues

- A. Does the evidence establish that the 65 megawatt ("MW") solar generation facility to be constructed in Wilson County, Kansas ("Sunflower Sky") and the 100 MW solar generation facility to be constructed in Jasper County, Missouri ("Foxtrot") (collectively, "Projects") for which Evergy Missouri West is seeking a certificate of convenience and necessity ("CCN") is necessary or convenient for the public service?

1. Should the Commission find that the Projects satisfy the first *Tartan* Factor of need?
 2. Should the Commission find that the Projects satisfy the second *Tartan* Factor of economic feasibility?
 3. Should the Commission find that the Projects satisfy the third *Tartan* Factor of ability to finance?
 4. Should the Commission find that the Projects satisfy the fourth *Tartan* Factor of qualified to construct?
 5. Should the Commission find that the Projects are in the public interest and satisfies the fifth *Tartan* Factor?
- B. If the Commission grants the CCN for the Projects, what conditions, if any, should the Commission impose on the CCN?
- C. Is this an appropriate proceeding for the Commission to review Evergy Missouri West's Green Solution Connections Program?
1. If so, should the Commission find that the Green Solution Connections Program proposed by Evergy Missouri West is just, reasonable, and not unjustly discriminatory or unduly preferential, and otherwise is lawful?
- D. If the Commission approves the Green Solution Connections Program proposed by Evergy Missouri West what, if any, conditions should the Commission impose on such approval?
- E. Is this CCN docket the appropriate case to determine whether Evergy Missouri West's decision to acquire, construct, own and operate the Projects is prudent under Section 2(C) of Commission Rule 20 CSR 4240-20.045?

1. If this is the appropriate docket, should the Commission grant Everygy Missouri West's request that its decision to acquire, construct, own and operate the Projects is prudent under Section 2(C) of Commission Rule 20 CSR 4240-20.045?

F. Should the Commission grant Everygy Missouri West's requested variances from Commission Rules 20 CSR 4240-20.045(3)(C), 6(I), and 6(J) so that Everygy Missouri West's plans for restoration of safe and adequate service, as well as as-built drawing, can be provided closer to the time when the Projects will commence commercial operations?

II. Order of Opening Statements

Everygy Missouri West
Midwest Energy Consumers Group
Sierra Club
Renew Missouri
Office of Public Counsel
Staff of the Missouri Public Service Commission

III. List and Order of Witnesses

John Carlson (Everygy Missouri West)
John M. Grace (Everygy Missouri West)
Kimberly H. Winslow (Everygy Missouri West)
G. Subash Alias (Everygy Missouri West)
Cody VandeVelde (Everygy Missouri West)
Jason Humphrey (Everygy Missouri West)
Kevin Gunn (Everygy Missouri West)
James Owen (Renew Missouri)
Dr. Geoff Marke (OPC)
Shawn Lange (Staff)
Donald A. Fontana (Staff)
Dr. Seoung Joun Won (Staff)
Justin Tevie (Staff)
Randall T. Jennings (Staff)
Dr. Hari Poudel¹ (Staff)

¹ Dr. Poudel will need to testify on the second day of the hearing, May 28, 2025, and a Motion for Staff Witness to Testify Via Webex was filed with the Commission on May 15, 2025.

Amanda Arandia (Staff)
Marina Gonzales (Staff)
Amanda Conner (Staff)
Sarah L.K. Lange (Staff)
J Luebbert (Staff)

IV. Order of Cross-Examination

Evergy Missouri West Witnesses

Midwest Energy Consumers Group
Sierra Club
Renew Missouri
Office of Public Counsel
Staff of the Missouri Public Service Commission

Renew Missouri Witness

Evergy Missouri West
Midwest Energy Consumers Group
Sierra Club
Office of Public Counsel
Staff of the Missouri Public Service Commission

Office of Public Counsel Witness

Staff of the Missouri Public Service Commission
Sierra Club
Renew Missouri
Midwest Energy Consumers Group
Evergy Missouri West

Staff of the Missouri Public Service Commission Witnesses

Office of Public Counsel
Sierra Club
Renew Missouri
Midwest Energy Consumers Group
Evergy Missouri West

Respectfully submitted,

/s/ Travis J. Pringle

Travis J. Pringle

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**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 20th day of May, 2025.

/s/ Travis J. Pringle