

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

Bethann C. Hill,	)	
	)	
Complainant,	)	File No. EC-2026-0350
	)	
Evergy Missouri West, Inc., d/b/a)	)	
Evergy Missouri West,	)	
	)	
Respondent.	)	

**REPLY TO EVERGY MISSOURI WEST'S
RESPONSE TO COMPLAINANT'S MOTION TO COMPEL**

COMES NOW **Bethann C. Hill** ("Complainant"), and hereby files this *Reply to Evergy Missouri West's ("Evergy") Response to Complainants Motion to Compel ("Reply")* filed September 16, 2026 and, in support of this *Motion*, states as follows:

1. On September 16, 2026, Evergy filed its Response to my *Motion to Compel* regarding Evergy's compliance with supplying requested discovery, as well as asking the Commission to uphold Staff's recommendation for dismissal, which denies enforcement of my discovery rights pursuant to 20 CSR-4240-2.090(2).

2. Complainant has never asked the Commission to rule or make orders on circuit court matters over which it lacks jurisdiction. It is a moot argument pertaining to my complaint. Evergy is intentionally and incorrectly insinuating that Complainant is seeking relief from the Commission for a circuit court eminent domain issue.

3. Staff's dismissal recommendation of my complaint was premature, stating its reason was "**based on the evidence available**" which ironically is what I am seeking -- evidence to prove the allegations.

4. The requested line clearance information directly relates to NESC standards and Commission orders. This information also directly relates to the **dollars** Evergy pays for an easement, which directly affects the **cost of service for its customers (ratepayers)**. Without the requested information, the Commission nor its Staff has sufficient evidence at this point to prove or disprove whether or not Evergy has made any violations, which is why the discovery process and the case must continue. If, at the point Evergy provides all requested information and an evidentiary hearing is held, the Commission will have an opportunity to consider **all** evidence and make its orders. If dismissed, my rights under 20 CSR 4240-2.070 for relief would be violated.

5. Evergy must comply with all discovery requests to produce documents and answer questions in my complaint, and avoid an unfair advantage by concealing information unknown to me and the Commission. I look forward to receiving the documents by September 30, 2026.

6. The Commission's dismissal of my complaint has potential for direct damage to me by a utility it governs. The absurdity of the Commission Staff suggesting dismissal before all of the evidence has been gathered, and ignoring the investigation of potential violations and resulting orders *prior to* Evergy seeking **any** amount of a Missouri citizen's property is unconscionable. Further, Staff has not made any attempts, to my knowledge, to communicate with me regarding evidence related to my case.

7. By its own admission (See the January 5, 2024 statement by Evergy in the subject *Motion to Compel*), Evergy is attempting to move its equipment outside of the MoDOT right-of-way so future expansions pass all costs of moving said equipment on to the State of Missouri rather than to only its customers.

8. Evergy's abuse of discretion related to its transmission line project must be investigated further in order to ensure my statutory rights of entitlement to be heard under RSMo. 386.420. As such, I request the Commission disregard Evergy's response and schedule an evidentiary hearing as soon as discovery has been received, on or before September 30, 2026. I also request the Commission to order Evergy to provide a monthly status report on its project in order to keep *all* parties apprised of the status, including when a completed and final engineering plan will become available which will allow determination of the specific public needs of the transmission line rebuild.

WHEREFORE, for the reasons stated herein, Complainant respectfully asks the Commission to:

- 1) Deny the Staff's Recommendation for dismissal; and
- 2) Soon after September 30, 2026, schedule an evidentiary hearing; and
- 3) Disregard Evergy's Response and order it to comply with all discovery requests until an evidentiary hearing is held, ensuring my statutory right to be heard; and
- 4) Order Evergy to file a monthly status report of its project, due the last business day of each month, beginning September 2026.

Such orders will avoid prejudice to the Complainant as the case moves forward to the point of an evidentiary hearing, and such orders will in no way negatively affect Evergy customers or the general public.

Respectfully Submitted,

/s/ *Bethann C. Hill*

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The foregoing was submitted this 17th day of September, 2026 to all parties via EFIS by:

/s/ *Bethann C. Hill*

Bethann C. Hill