

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

In the Matter of a Motion for an)
Emergency Order Establishing a)
Temporary Moratorium on Utility)
Discontinuances to Protect Public Health)
and Safety by Mitigating the Spread of)
the COVID-19 Pandemic)

File No. AO-2021-0164

STAFF RESPONSE TO MOTION FOR AN EMERGENCY ORDER

The Staff of the Missouri Public Service Commission (Staff), through Staff Counsel’s Office, files this response to the Motion for an Emergency Order filed by the Consumers Council of Missouri.

Summary

It is within the Commission’s sound discretion under Section 386.310, RSMo (2016), whether to issue a temporary order establishing a moratorium on utility disconnections in order to protect the public health, but the Commission would be required by law to hold a hearing before issuing a final moratorium order. Any final order would need to be supported by competent and substantial evidence adduced at the hearing, such as the testimony of an expert witness in public health establishing that the relief Movants seek will more likely than not protect the public health. If the Commission were inclined to issue such an order, it must authorize an accounting mechanism to track the financial impacts to the utility directly resulting from the moratorium. After hearing the Commission should also carefully and narrowly tailor any order to avoid any unintended consequences.

Staff would not oppose a temporary order establishing a moratorium on utility disconnections for customers of electric corporations, gas corporations, and water

corporations that are not a “small water corporation” under Section 393.146.1(4), RSMo (2016), through a date no later than December 31, 2020, on condition that: 1) the Commission hold a hearing on Movant’s request no later than December 31, 2020; and 2) the Commission authorize appropriate accounting mechanisms allowing affected utilities to track the financial impacts of such an order.¹

Staff Response to Motion

I. The Staff does not oppose a temporary emergency order effective through December 31, 2020, but the Commission is required to hold a hearing “as soon as practicable” under Section 386.310.1, RSMo (2016).

Section 386.310 authorizes the Commission “to require the performance of any other act which the health or safety of its employees, customers or the public may demand,” but only “after a hearing.” Sec. 386.310.1, RSMo (2016). The Commission is authorized to waive the requirements for notice and hearing if it determines that “failure to do so would result in the likelihood of imminent threat of serious harm to life or property, provided that the commission shall include in such an order an opportunity for hearing as soon as practicable after the issuance of such order.” *Id.*²

¹ The order should not and need not decide whether a utility should recover these amounts in a future rate case. *Office of Pub. Counsel v. Evergy Mo. West, Inc.*, 609 S.W.3d 857, 872 (Mo. App. W.D. 2020) (an AAO does not set or modify any utility rate, but rather defers specific financial items for consideration in a future rate case).

² Movant’s filing is not denominated a petition for rulemaking under Commission Rule 20 CSR 4240-2.180. Section 386.310.1, RSMo (2016) does authorize the Commission to act by “general or special orders.” However, if the Commission is inclined to grant Movant’s proposed relief, it should consider proceeding under the emergency rulemaking procedures of Section 536.025, RSMo (2016). Under the Missouri Administrative Procedure Act, an agency “announcement of policy or interpretation of law that has future effect and acts on unnamed and unspecified facts is a ‘rule’” that must be promulgated under Chapter 536. *Dep’t of Social Servs. v. Little Hills Healthcare, LLC*, 236 S.W.3d 637, 642 (Mo. banc 2007). Missouri law authorizes emergency rulemaking procedures at Section 536.025, RSMo (2016), and procedures to petition an agency for the adoption of any rule at Section 536.041, RSMo (2016).

In any case where a hearing is required, the Commission's order must be based on competent and substantial evidence. *State ex rel. Pub. Counsel v. pub. Serv. Comm'n*, 210 S.W.3d 344, 354 (Mo. App. W.D. 2006). Only final commission orders are subject to review under 386.510, not interlocutory orders that are tentative, provisional, and contingent, subject to recall, revision or reconsideration. *AG Processing, Inc. V. KCP&L Great Mo. Operations Co.*, 432 S.W.3d 226, 230 (Mo. App. W.D. 2014).

Here, Movant Consumers Council of Missouri has filed a signed but unverified motion asking for an emergency order suspending utility disconnections and late fees until March 31, 2020, for all residential customers of Missouri's electric corporations, gas corporations, and water corporations, as defined by Section 386.020, RSMo (Supp. 2019).³ The motion argues that a utility disconnection moratorium would protect the public health. The motion also seeks a moratorium on late fees, but it does not argue that a moratorium on late fees would provide public health benefits.

Staff generally prefers that any request for an emergency order be supported by a verified pleading or supporting affidavit. However, in the absence of such a filing the Commission is nevertheless authorized by the plain language of Section 386.310 to issue a temporary emergency order where the Commission finds it is necessary to protect against imminent threats to life and property.

An order establishing a moratorium with associated accounting mechanisms would not be inconsistent with the approach taken by some states, but the majority of states

³ The Commission's general rules for pleadings do not require pleadings to be verified or supported by affidavit. 20 CSR 4240-2.080(6) (Rule 2.080). Only Applications (Rule 2.060), Petitions for Rulemaking (Rule 2.180), and Motions for Summary Determination (Rule 2.117) require verified pleadings or supporting affidavits.

have either a voluntary moratorium or a moratorium that has expired. According to the National Association of Utility Regulatory Commissioners (NARUC), ten states have active orders issuing moratoria on utility shutoffs, and fifteen states have voluntary moratoria.⁴ In another twenty-six states, moratoria have expired.⁵ Of the eight states bordering Missouri, Arkansas has an active moratorium order in place, Nebraska and Oklahoma have voluntary moratoria in place, and the remaining states have expired moratoria.⁶

If it is inclined to grant Movant's requested emergency order, the Commission would be required to hold a hearing as soon as practicable before entering a final order under 386.310, and Movant would be required to support its request for a moratorium by competent and substantial evidence on the whole record. If the Commission were to issue a temporary emergency order, Staff's ultimate position would depend on the evidence adduced in the hearing required by Section 386.310. As an example, Commission Staff may inquire into such things as the evidence linking moratoria to public health outcomes, waiver of late fees to public health outcomes, the effectiveness of moratoria compared to other public health interventions, the effectiveness of a blanket moratoria compared to other customer relief programs already offered by various Missouri utilities, and the potential impact on ratepayers. Commission Staff would analyze the evidence generally and as it applied specifically to the electric, gas, and water industry sectors.

⁴ Map of Disconnection Moratoria <https://www.naruc.org/compilation-of-covid-19-news-resources/map-of-disconnection-moratoria/> (last visited Dec. 10, 2020).

⁵ *Id.*

⁶ *Id.*; see also, *In the Matter of Administrative Orders Relating to the Covid-19 State of Emergency*, Ark. Pub. Serv. Comm'n, Docket No. 20-012-A, Order No. 1 (AR PSC, Apr. 10, 2020) (available at http://www.apscservices.info/pdf/20/20-012-A_1_1.pdf) (last visited Dec. 10, 2020) (ordering moratoria until rescinded by Commission for water, gas, and electricity service and authorizing the use of an accounting mechanism to allow future recovery of costs resulting from the moratorium).

Specifically, Staff has been informed that Evergy has extended its voluntary moratorium on residential service disconnections through March 1, 2021, and that both Spire Missouri and Missouri American Water Company have suspended residential service disconnections through the end of the calendar year. In addition, since the Covid-19 pandemic began, the Commission has issued multiple orders authorizing several programs for customers affected by Covid-19 that have been proposed or agreed to by utilities,⁷ and the Commission opened a docket to consider best practices for recovery of past-due customer payments.⁸ Finally, the Commission's cold weather rule, 20 CSR 4240-13.055, is currently in effect through March 31, 2020. Commission Staff would be interested in whether a moratorium order in addition to these existing programs would be likely to produce tangible public health benefits.

In summary, Staff does not oppose a temporary emergency order effective through December 31, 2020, but it would reserve its final position on the evidence adduced at a subsequent hearing if the Commission did issue an emergency order.

⁷ *E.g.*, cases EE-2020-0290 (authorizing variance from tariffs allowing Ameren Missouri to forego collection of late fees and reconnections); GE-2020-0322 (authorizing variance from tariffs allowing Summit Natural Gas to waive reconnection fees); EE-2020-0314 (authorizing variance from tariffs allowing Ameren Missouri to indefinitely waive program requirement limiting the number of missed, late, or partial payments allowed under the Company's Current Program Low-Income Pilot tariff); GT-2020-0316 (authorizing Spire Missouri to revise its low-income tariff to provide approximately \$940,000 in one-time bill credits to customers financially impacted by COVID-19); GE-2020-0289 (authorizing variance from tariffs allowing Spire Missouri to suspend disconnections for residential customers and waive late payment charges through May 31, 2020); AO-2020-0335 (authorizing variance from tariffs allowing Empire/Liberty Utilities entities to forego collection of late payments, not send collection or disconnection notices, and to reconnect recently disconnected customers); ER-2019-0335 (authorizing modification of previous agreement between Ameren Missouri and the Office of Public Counsel to provide approximately \$3.5 million to help low-income Ameren customers); EO-2020-0383 (authorizing voluntary moratorium on disconnections to July 15, 2020, and flexible payment arrangements for Evergy customers); GE-2020-0373 (granting temporary waivers for certain Commission rules due to social distancing orders and guidelines).

⁸ Case AW-2020-0356.

II. If the Commission issues an emergency order, it should apply only to electrical corporations, gas corporations, and water corporations that are not “small water corporations” under Section 393.146.1(4), RSMo (2016), and any order setting should expressly allow interested parties to seek alternatives or exemptions to the blanket moratorium order requested by Movants.

Without the benefit of time to investigate, Staff is unable to establish whether a moratorium would be in the interest of public health in all instances for all utilities. For example, and without taking the position that this hypothetical would actually occur, a residential shutoff moratorium might backfire where the utility risks running out of operating funds and is unable to provide safe and adequate service to all of its customers.

For this reason, Staff recommends that an Order, if it is issued, apply only to the States’ regulated electric corporations, gas corporations, and water corporations that are not “small water corporations” under Section 393.146.1(4), RSMo (2016) (i.e., those regularly serving 8,000 or fewer customer connections). Such an order should not be extended to any such small water corporation unless and until there is an opportunity to present evidence in a hearing demonstrating the effect of a moratorium on their ability to provide safe and adequate service.

If it holds a hearing, the Commission should fully examine the potential for this and any other unintended consequence that may arise from Movant’s requested shutoff moratorium. Any order should be carefully crafted to avoid any unintended consequences.

III. If the Commission does issue an emergency order, it must authorize appropriate accounting mechanisms to allow affected utilities to track the financial impacts of such an order.

The timing of Movant's filing on December 7 and the response deadline of December 14, 2020, does not permit a full analysis of the potential financial impact of the Movant's proposed moratorium on disconnect and late fees. However, the Staff reports on Utility Data Request Responses, for which the most recent update was filed Nov. 23, 2020 in Case Number AW-2020-0356, suggest that the effect of such an order would be significant.⁹

Accordingly, if the Commission were inclined to issue an emergency order in this case, it must also authorize any appropriate accounting mechanisms allowing affected utilities to track any changes in revenues or expenses directly resulting from such an order, without deciding that affected utilities are guaranteed future recovery of those tracked amounts. For larger utilities, the accounting mechanism should be established pursuant to an accounting authority order (AAO) under Section 393.140, RSMo (2016).

⁹ For the convenience of the parties and the Commission, Staff attaches and incorporates that report as **Exhibit 1** to this response.

Granting such accounting treatment would be consistent with the approach of other State regulatory commissions that have issued moratorium orders.¹⁰ It also avoids the potential that such an order could raise unconstitutional takings arguments.¹¹

CONCLUSION

For the reasons stated above, Staff files this response stating that: 1) it does not oppose a temporary emergency order for electric corporations, gas corporations, and water corporations that are not “small water corporations” as defined by Section 393.146.1(4), RSMo (2016), effective through December 31, 2020 on condition that 2) the Commission should hold a hearing on or before December 31, 2020 to fully consider Movant’s request, 3) the Commission should authorize any appropriate accounting mechanisms allowing affected utilities to track the financial impacts of such an order, 4) the Commission should use the hearing to apprise itself of the potential of any unintended consequences, and 5) the Commission should grant such other and further relief the Commission deems just.

¹⁰ See, e.g., Arkansas Docket No. 20-012-A (AR PSC, Jun. 18, 2020) (available at http://www.apscservices.info/EFilings/Docket_Search_Documents.asp?Docket=20-012-A&DocNumVal=1); California Resolution M-4842 at 6 (CA PUC, Apr. 16, 2020) (available at <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M333/K482/333482381.PDF>); Hawaii Order 37251 at 2 (HI PUC, Jul. 31, 2020) (available at <https://puc.hawaii.gov/wp-content/uploads/2020/07/ORDER-37251.pdf>).

¹¹ See, *State ex rel. St. Louis-San Francisco Ry. Co. v. Pub. Serv. Comm’n*, 331 Mo. 438, 53 S.W.2d 868 (Mo. 1932) (rejecting argument that Commission order under predecessor to Section 386.310, was necessarily an unconstitutional taking where “The cost of such an improvement [to a railroad crossing signal] cannot be imposed upon a railroad merely because it is a railroad, but, where the present of the railroad company’s tracks and the condition of its right of way makes a public street crossing dangerous and hazardous to the public, the state has a constitutional right to require improvements which will decrease the danger.”). It is not Staff’s position that an emergency moratorium order would necessarily violate the takings clauses of the Missouri or United States Constitutions.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 14th day of December, 2020, to all parties and/or counsels of record.

/s/ Curt Stokes

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

In the Matter of a Working Case to Consider Best Practices for Recovery of Past-Due Utility Customer Payments After the Covid-19 Pandemic Emergency)
) **File No. AW-2020-0356**

**STAFF REPORT ON UTILITY DATA REQUEST RESPONSES AND
REQUEST FOR COMMISSION ORDER**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its *Staff Report on Utility Data Request Responses and Request for Commission Order* respectfully states as follows:

STAFF REPORT ON UTILITY DATA REQUEST RESPONSES

1. On August 19, 2020, the Commission issued its *Order Directing Staff to Gather Information about Utility Disconnections* (“Order”), and directed Staff to gather information from the state’s utilities regarding current levels of disconnection for non-payment, anticipated levels of such disconnections by those utilities in the next six months, number of customers with past due accounts, number of customers that have received a final disconnection notice, and number of customers participating in payment plans. Through Staff’s DRs in this docket, initially filed on August 24, 2020, state utilities were asked to update these numbers on a monthly basis.

2. As more thoroughly discussed in Staff’s Report, attached hereto as Appendix A, Staff has received updated information through the end of October 2020 from all of the state’s utilities, and now presents the data for the Commission’s review.

REQUEST FOR COMISSION ORDER

3. During the drafting of Staff's October report, it became clear that state utilities were unable to provide the required data in time to file a report by the 15th of each month, as outlined in the Commission's Order.

4. The DRs initially submitted by Staff on August 24, 2020, asked that state utilities respond with updated data by the 10th of each month. Few have actually met that deadline.

5. In order for Staff to have the necessary time to fully analyze and compile the data in this working docket, Staff respectfully requested an extension of the filing date for the remaining reports from the 15th of every month to the 22nd of every month. The Commission granted Staff's request on October 16, 2020.

6. Due to November 22, 2020 falling on a Sunday, Staff's report was set for filing this month on November 20, 2020.

7. However, even with the extension in place, state utilities again failed to get the updated data to Staff in a timely fashion. Staff received updated data from Evergy Missouri West, Inc. d/b/a Evergy Missouri West and Evergy Missouri Metro, Inc. d/b/a Evergy Missouri Metro on November 17, 2020; Spire Missouri, Inc. d/b/a Spire on November 19, 2020; Union Electric Company d/b/a Ameren Missouri on November 18, 2020; and the Central States Water Resources affiliates (Confluence, Elm Hills, Hillcrest, Indian Hills, and Raccoon Creek Utility Operating Companies on November 19, 2020.

8. Due to the delay in the above companies filing, Staff had to request an extension to file its report on November 19, 2020. The Commission granted the request on November 20, 2020, giving Staff November 23, 2020 to file its report.

9. The importance of Staff receiving updated data well in advance of its filing date was made clear this month by The Empire District Gas Company d/b/a Liberty (Empire), Liberty Utilities (Missouri Water) d/b/a Liberty Utilities, and Liberty Utilities (Midstates National Gas) Corp. d/b/a Liberty Utilities (MNG) d/b/a Liberty (MNG). All three utilities filed an initial response on November 10, 2020. However, following Staff's analysis, all three companies filed updated responses that clarified and corrected mistakes in the initial responses.

10. In order to ensure the data is delivered to Staff in a timely manner, and allow for the proper analysis and incorporation of the data into Staff's report, as well as ensure that Staff can meet its filing deadline of the 22nd of each month, Staff respectfully requests the Commission order the state utilities in this docket file a response in EFIS to Staff's DRs no later than the 15th of every month.

WHEREFORE, Staff respectfully submits its report for the Commission's knowledge and consideration, and requests that the Commission order the state utilities in this docket to file a response in EFIS to Staff's DRs no later than the 15th of every month.

Respectfully Submitted,

/s/ Travis J. Pringle

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to all parties and/or counsels of record this 23rd day of November, 2020.

/s/ Travis J. Pringle

MISSOURI PUBLIC SERVICE COMMISSION

STAFF REPORT



**A WORKING CASE TO CONSIDER BEST PRACTICES
FOR RECOVERY OF PAST-DUE UTILITY CUSTOMER PAYMENTS
AFTER THE COVID-19 PANDEMIC EMERGENCY**

FILE NO. AW-2020-0356

NOVEMBER 23, 2020

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Staff Report on Utility Data Request Responses in

File No. AW-2020-0356

On August 19, 2020, the Missouri Public Service Commission (“Commission” or “PSC”) issued its *Order Directing Staff to Gather Information about Utility Disconnections*. In its Order, the Commission directed Staff to gather information from the state’s utilities regarding current levels of disconnections for non-payment, anticipated levels of such disconnections by those utilities in the next six months, number of customers with past-due accounts, number of customers that have received a final disconnection notice, and number of customers participating in payment plans. The Staff was then directed to file a report to share its findings no later than September 21, 2020. The Commission also directed the Staff to file monthly updates to the report on the 15th day of each following month.¹ This report represents the second such update, incorporating information through the end of October 2020 when available.

In response to the Order,² Staff submitted data requests to specific Missouri utilities listed below requesting the following information pertaining to the July and August 2020 billing cycles (providing clarification that “billing cycles” is defined as all billing cycles that are read in a calendar day in a given month):

1) (a) the number of disconnections for non-payment of services as of each month-end; (b) the number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due;” (c) the number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end; and (d) the number of customers at each month-end participating in payment plans. 2) Please provide your company’s estimate of the number of disconnections for non-payment of service for the six-month period of September 2020

¹ On October 16, 2020, the Commission subsequently extended the due date for the updated reports to the 22nd of each month.

² File No. AW-2020-0356 *Order Directing Staff to Gather Information About Utility Disconnections*, page 2, Section 1.

through February 2021, with an explanation of the methodology and assumptions used to develop these projections. 3) Please provide the same information requested in 1)(a) through 1)(d) applicable to your Company's August 2019 through February 2020 billing cycles.

For purposes of this updated report, the following utilities responded to this Staff data request with month-end October 2020 data, and their responses are included in this report: Ameren Missouri ("Ameren Missouri - Electric"); Ameren Missouri ("Ameren Missouri - Gas"); Evergy Missouri Metro, Inc. ("Evergy Metro – Electric"); Evergy Missouri West ("Evergy West – Electric"); Summit Natural Gas of Missouri ("Summit – Gas"); The Empire District Electric Company ("Empire - Electric"); The Empire District Gas Company ("Empire - Gas"); Spire Missouri, Inc. ("Spire – Gas"); Liberty Utilities (Missouri Water), LLC ("Liberty – Water"); Liberty Midstates Gas ("Liberty – MNG – Gas"); Missouri-American Water Company ("Missouri American Water – Water"); Raytown Water Company ("Raytown Water"); Confluence Rivers Utility Operating Company, Inc. (Confluence Rivers – Water), Elm Hills Utility Operating Company, Inc. ("Elm Hills – Water"), Hillcrest Utility Operating Company, Inc. ("Hillcrest – Water"), Indian Hills Utility Operating Company, Inc. (Indian Hills – Water), and Raccoon Creek Utility Operating Company, Inc. ("Raccoon Creek – Sewer").

The following discussion presents the utilities' responses to Questions 1 and 3 in a series of graphs. This information is followed by tables providing the utilities' responses to Question 2.

The information reported below for Questions 1 and 3 is presented for the period August 2019 through February 2020 (orange dots and line), and for the period of August 2020 through October 2020 (blue dots and line). As this report is updated in the future, the blue dots and line will eventually extend through at least February 2021. This method of presentation will allow for a direct comparison of the reported information for each month from August 2020 to February 2021 with the same month one year earlier. Also, the report will specify the most recent

month-to-month percentage change for each category of information (e.g., number of disconnections in October 2020 compared to September 2020).

Summary of Responses to Questions 1 and 3

Regarding Question 1a and 3a, most of the utilities reported an increase in the number of customer disconnections in October 2020 compared to the amount from October 2019. However, some utilities reported increases and others reported decreases in the number of disconnections for October 2020 compared to the previous month, September 2020.

For Question 1b and 3b, most utilities reported increases in the number of past-due customer accounts in October 2020 compared to the amount from October 2019. There appeared to be approximately an equal number of increases and decreases reported for past-due accounts in October 2020 compared to the previous month.

For Question 1c and 3c, most utilities reported decreases in the number of customers who have received final disconnection notices, but have not yet been disconnected, compared to October 2019. Most utilities reported decreases in this metric for October 2020 compared to the previous month.

Regarding Question 1d and 3d, almost all utilities reported increases in the number of customers participating in payment plans in October 2020 compared to October 2019, with some increases being quite large. However, there was no clear trend up or down in the number of customers participating in payment plans in October 2020 compared to the previous month.

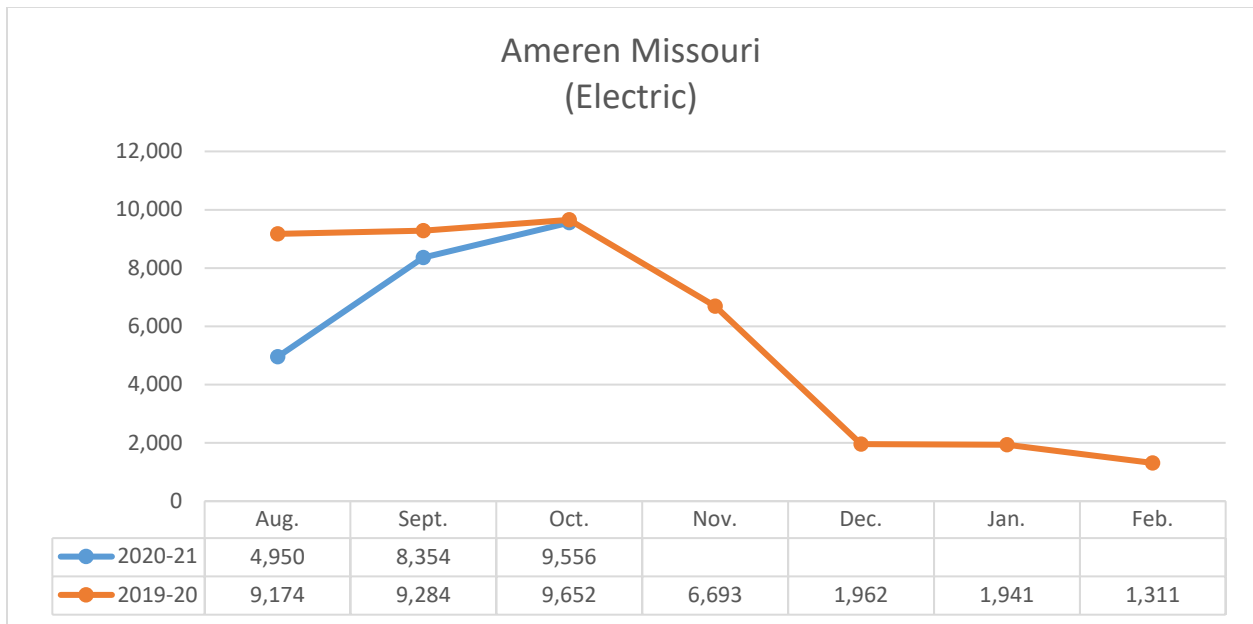
For Question 2 (utility projections of number of disconnections for the period September 2020 through February 2021), no new information was provided by the utilities since the last report was filed.

Individual Utility Responses:

Questions 1 & 3 (Ameren Missouri – Electric)

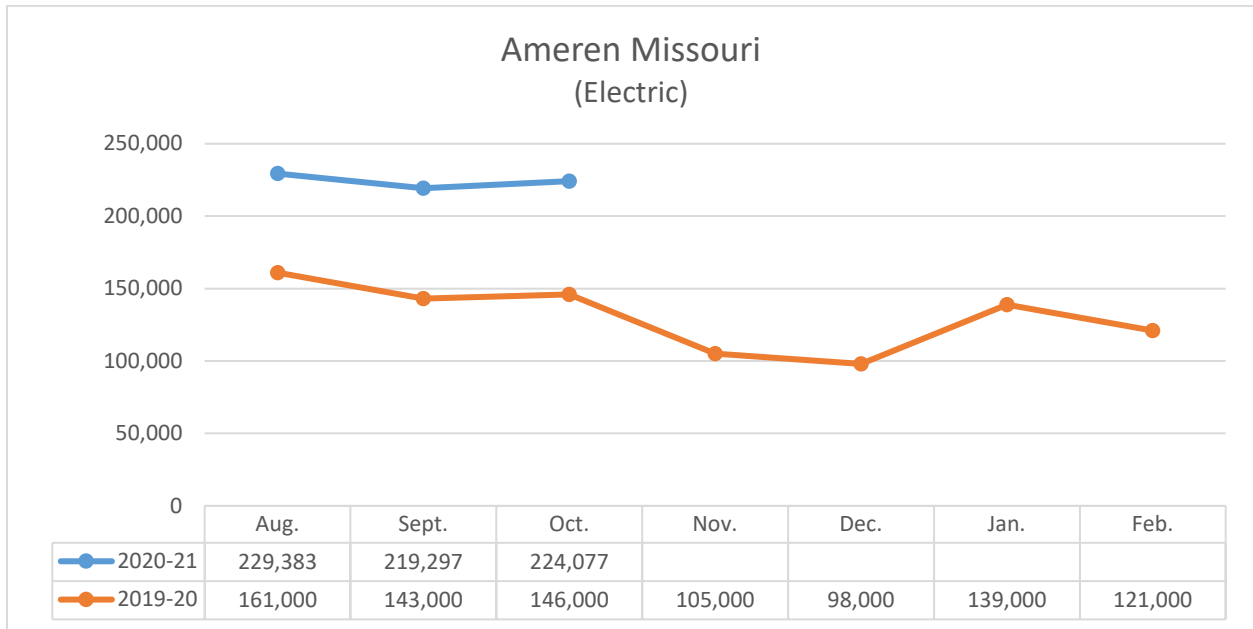
Ameren Missouri – Electric submitted some revised data for Questions 1a, 1b, and 1c for August and September 2020 when it provided its October 2020 data. This corrected information is reflected in the following graphs and accompanying narrative.

a) The number of disconnections for non-payment of services as of each month-end



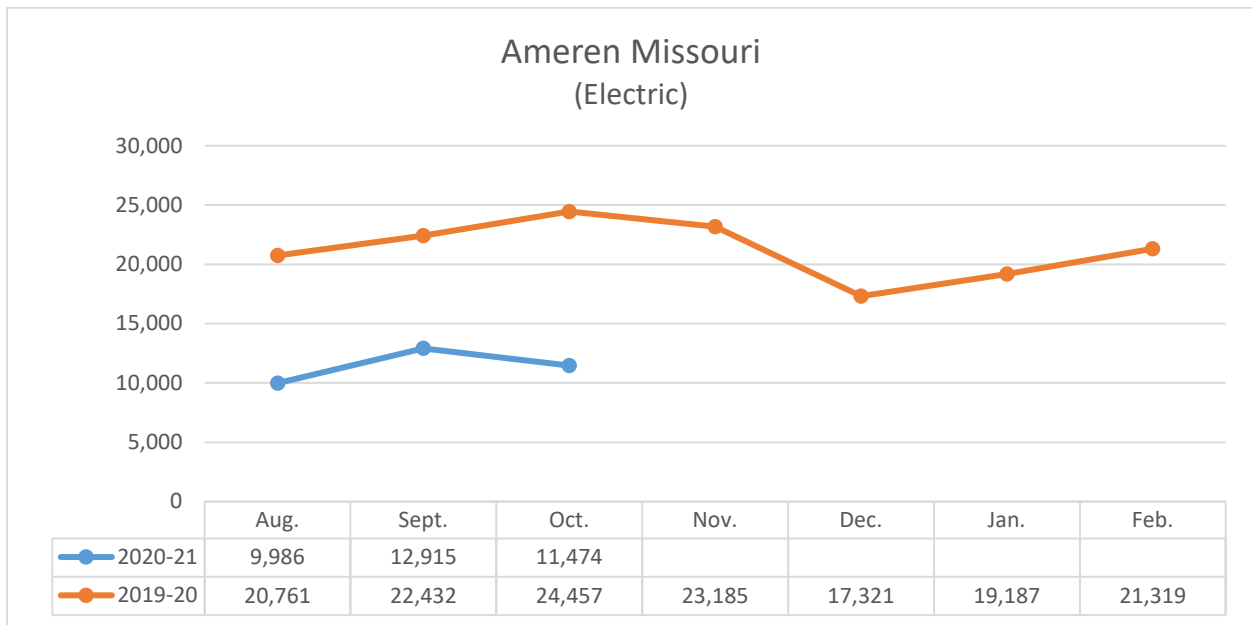
As shown in the previous graph, Ameren Missouri performed approximately 1% fewer disconnections for non-payment in October 2020 versus October 2019 and about 14% more in October 2020 than in September 2020.

b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”



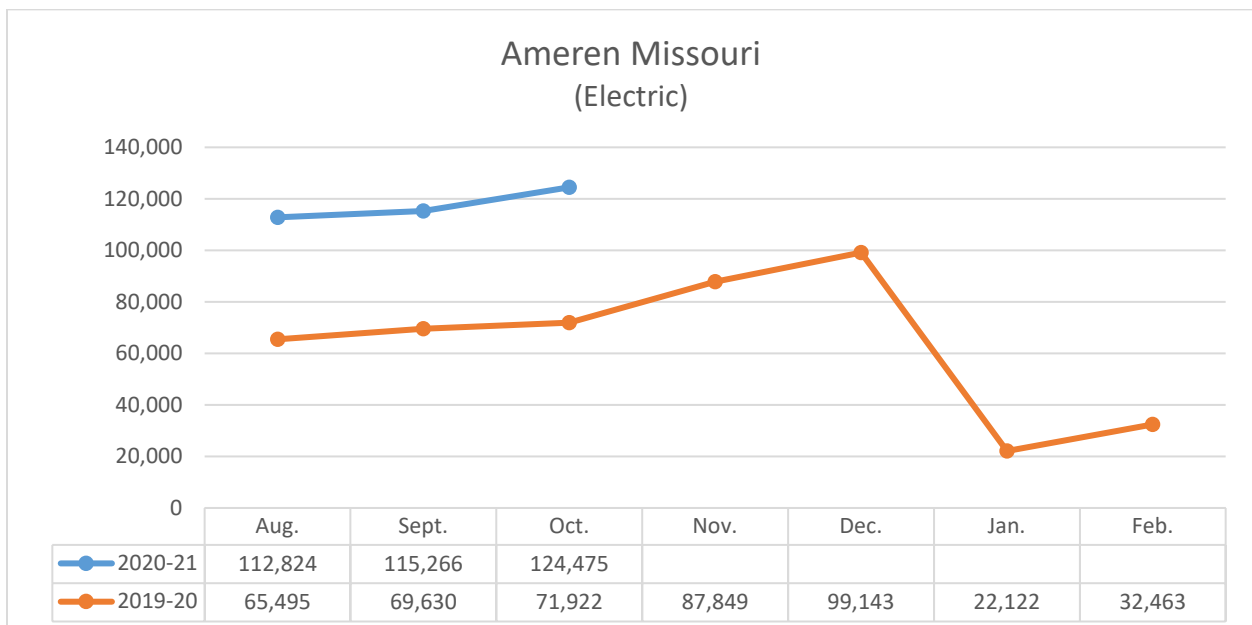
The previous data indicates that there were about 53% more Ameren Missouri customers with past-due accounts in October 2020 versus October 2019 and approximately 2% more in October 2020 than in September 2020. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



As shown by Ameren Missouri’s data, for those customers who received a final disconnection notice there were about 53% fewer customers who were not disconnected in October 2020 versus October 2019 and approximately 11% less in October 2020 than in September 2020.

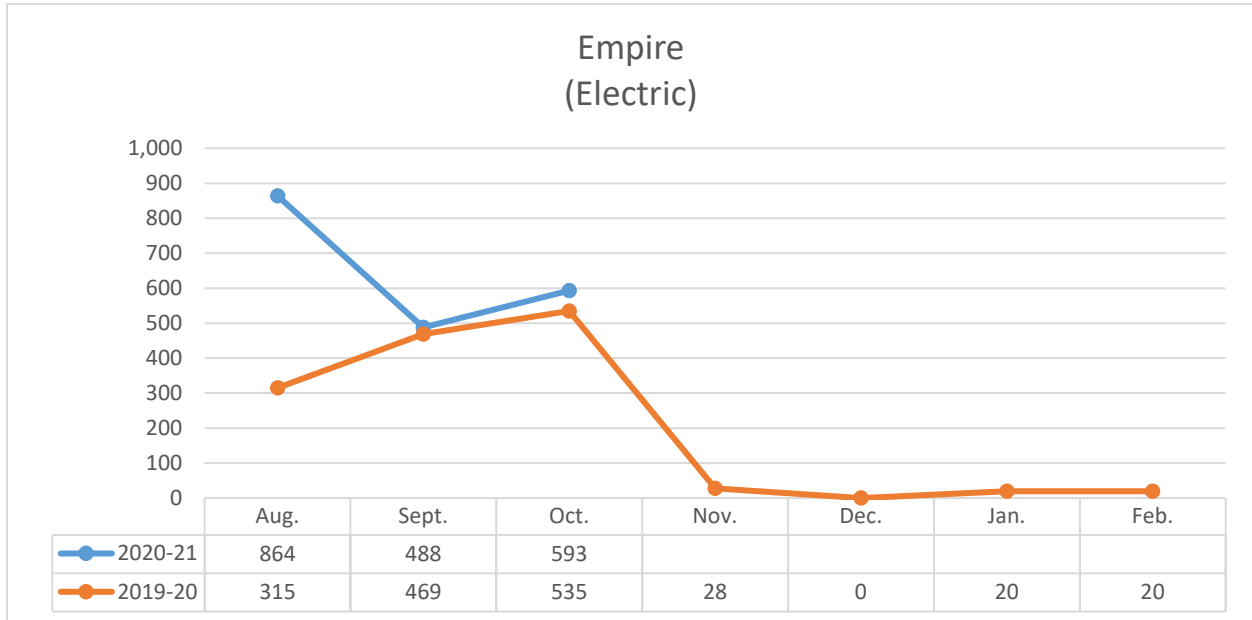
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 73% more Ameren Missouri customers who participated in payment plans in October 2020 versus October 2019 and about 8% more in October 2020 than in September 2020.

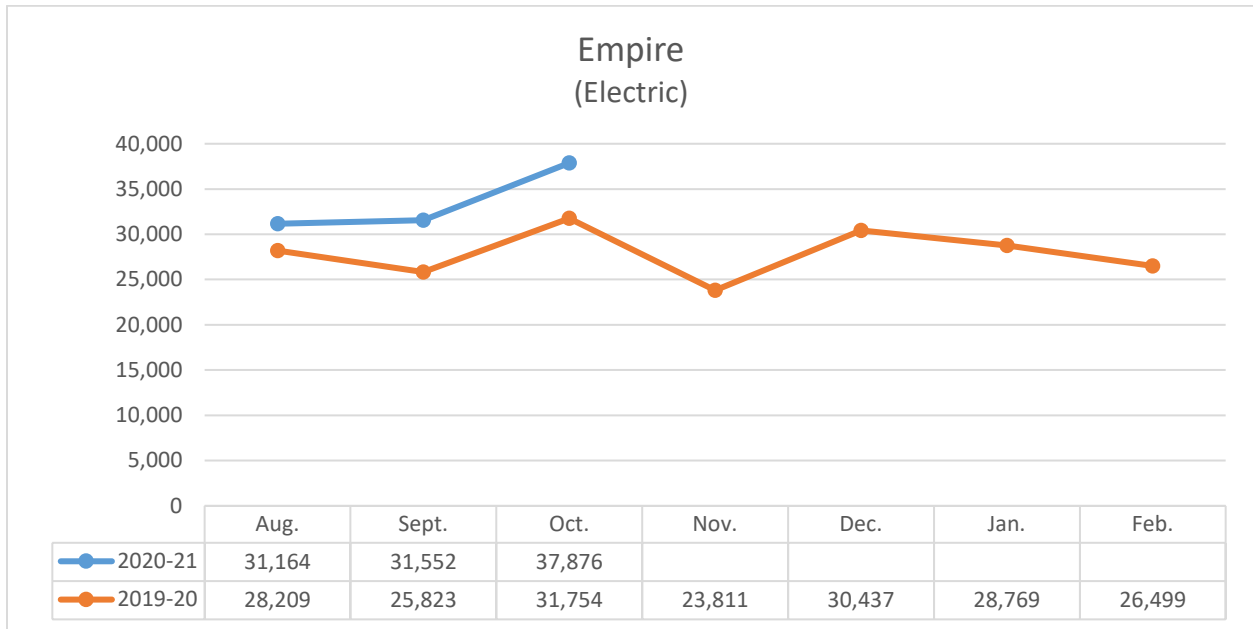
Questions 1 & 3 (Empire – Electric)

a) The number of disconnections for non-payment of services as of each month-end



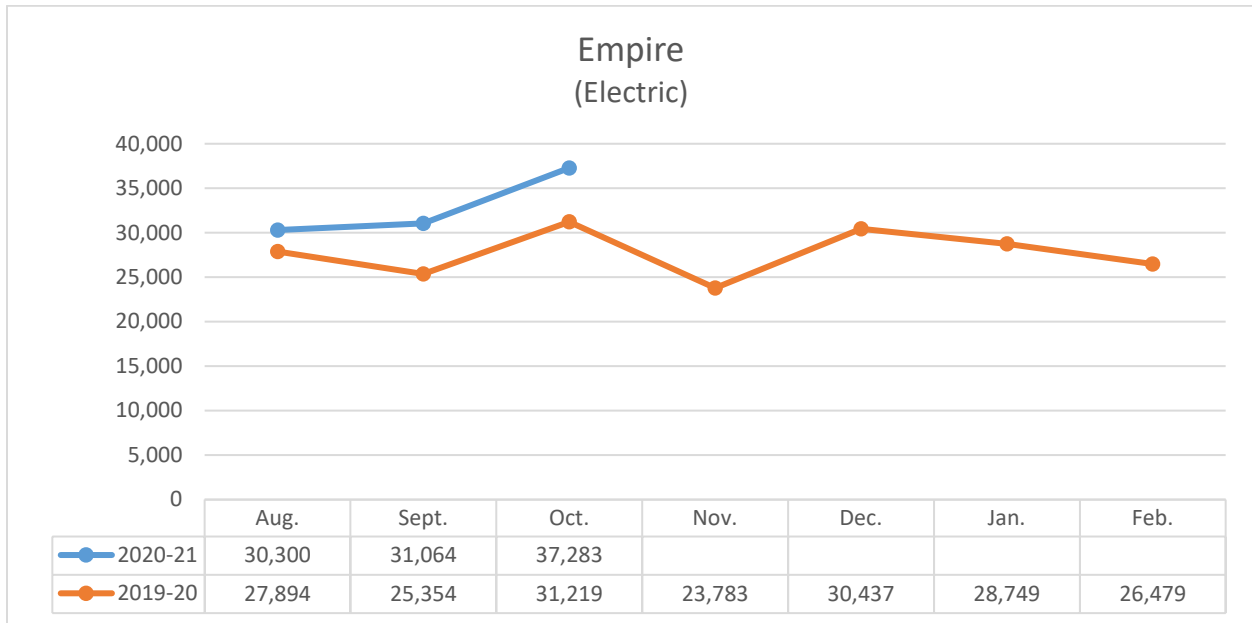
As shown in the previous graph, Empire performed approximately 11% more disconnections for non-payment in October 2020 versus October 2019 and about 22% more in October 2020 than in September 2020.

b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”



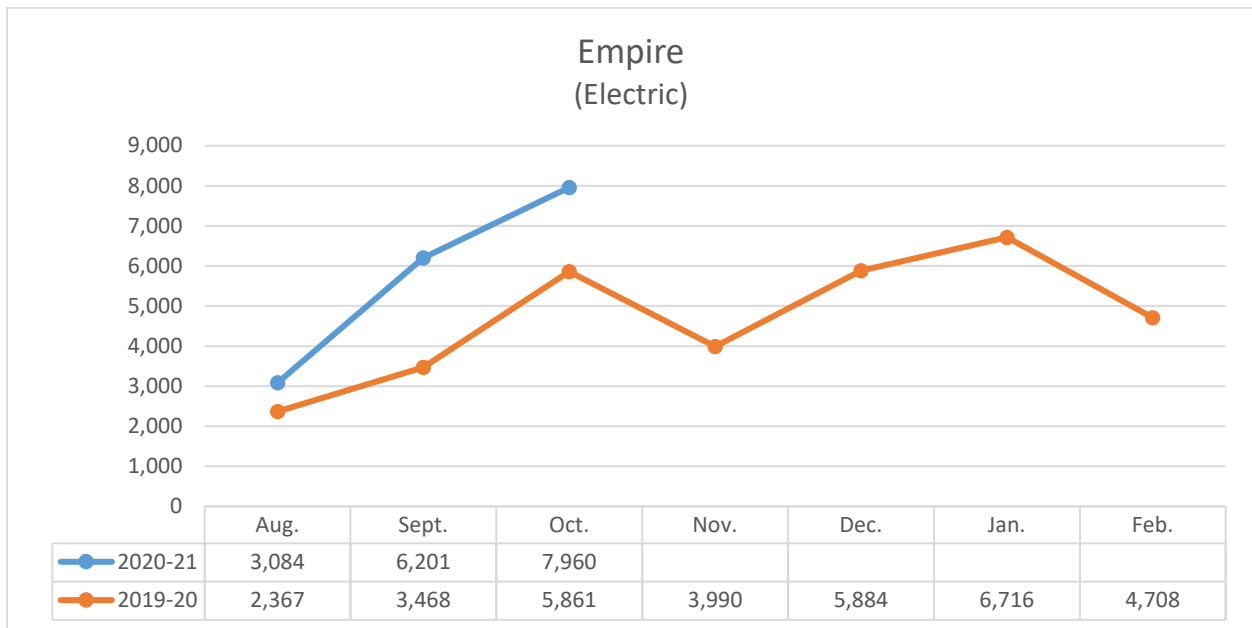
The previous data indicates that there were about 19% more Empire customers with past-due accounts in October 2020 versus October 2019 and approximately 20% more in October 2020 than in September 2020. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement due date.

c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



As shown by Empire’s data, for those customers who received a final disconnection notice there were about 19% more customers who were not disconnected in October 2020 versus October 2019 and approximately 20% more in October 2020 than in September 2020.

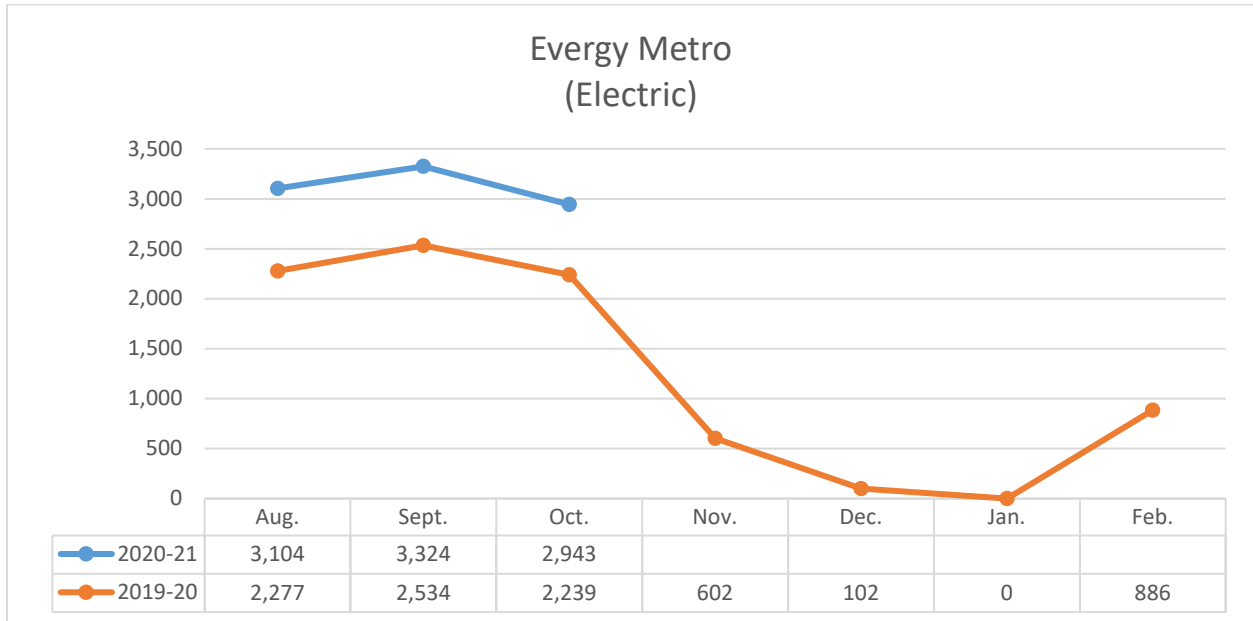
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 36% more Empire customers who participated in payment plans in October 2020 versus October 2019 and about 28% more in October 2020 than in September 2020.

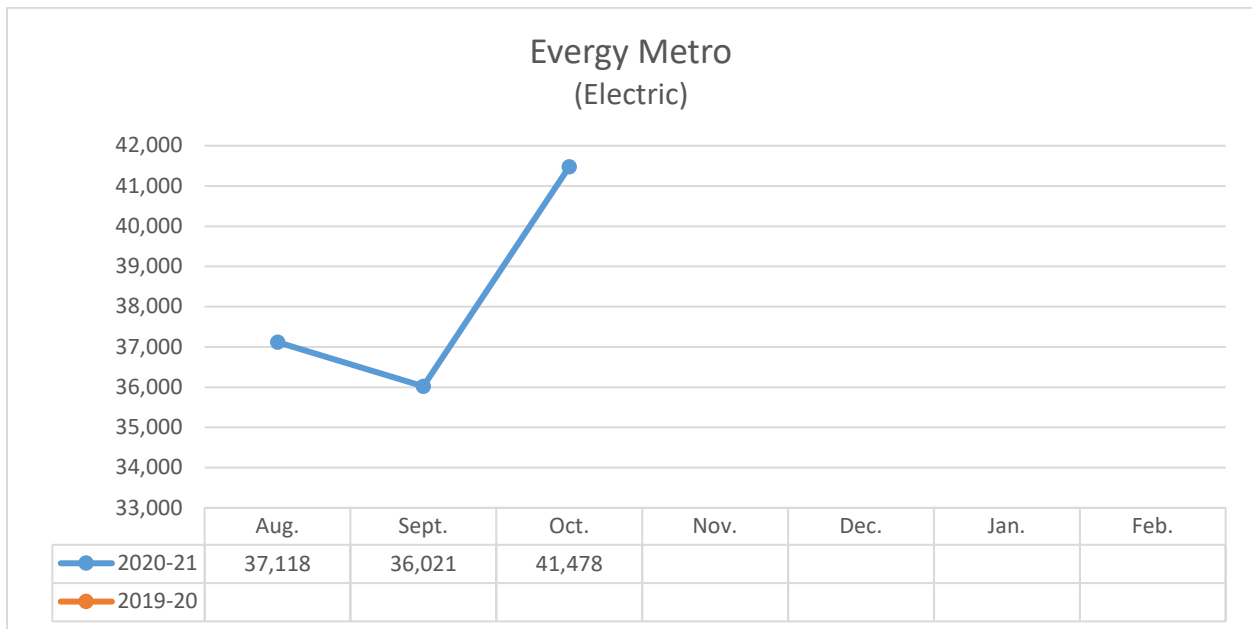
Questions 1 & 3 (Evergy Metro – Electric)

a) The number of disconnections for non-payment of services as of each month-end



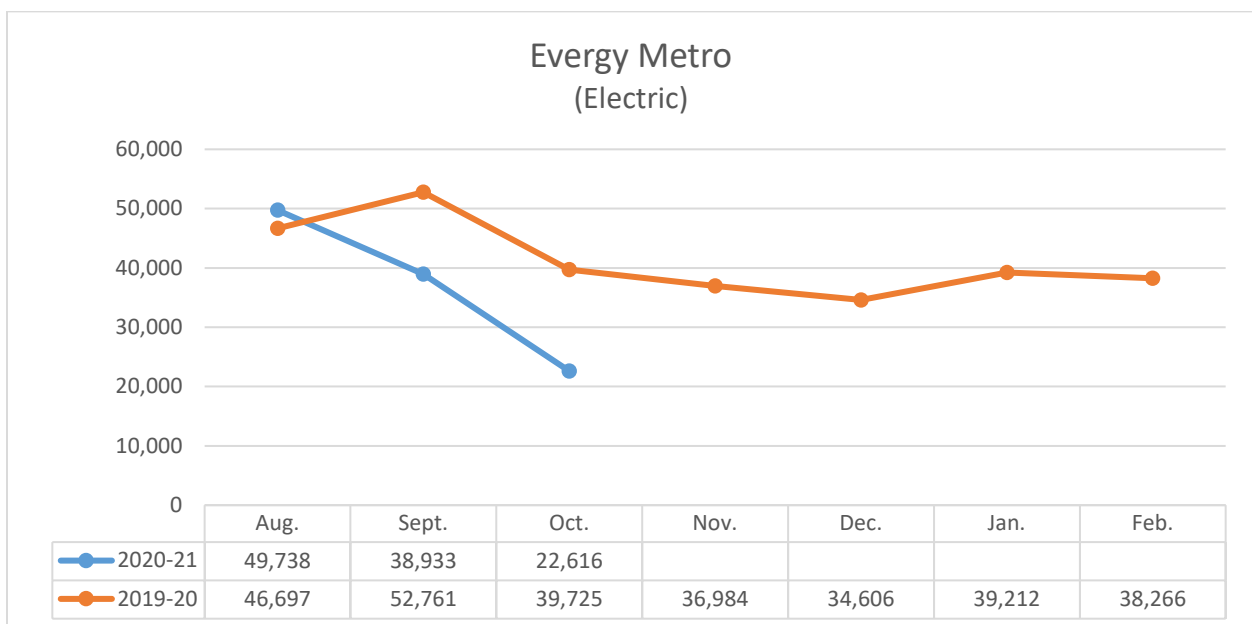
As shown in the previous graph, Evergy Metro performed approximately 31% more disconnections for non-payment in October 2020 versus October 2019 and about 12% less in October 2020 than in September 2020.

b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”



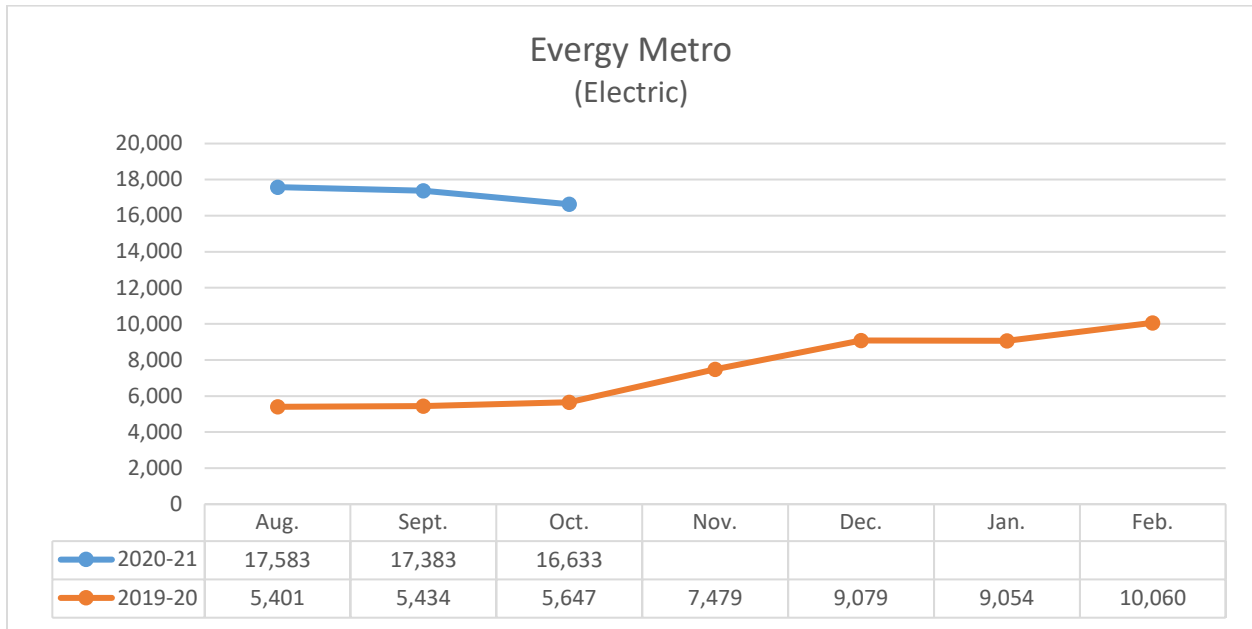
The previous data indicates that there were about 15% more Evergy Metro customers with past-due accounts in October 2020 versus September 2020. Evergy Metro indicated it is unable to provide comparable past-due data for August 2019 to February 2020. Evergy Metro defines past-due accounts as accounts that are more than 30 days in arrears.

c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



As shown by Evergy Metro’s data, for those customers who received a final disconnection notice there were about 43% fewer customers who were not disconnected in October 2020 versus October 2019 and approximately 42% less in October 2020 than in September 2020.

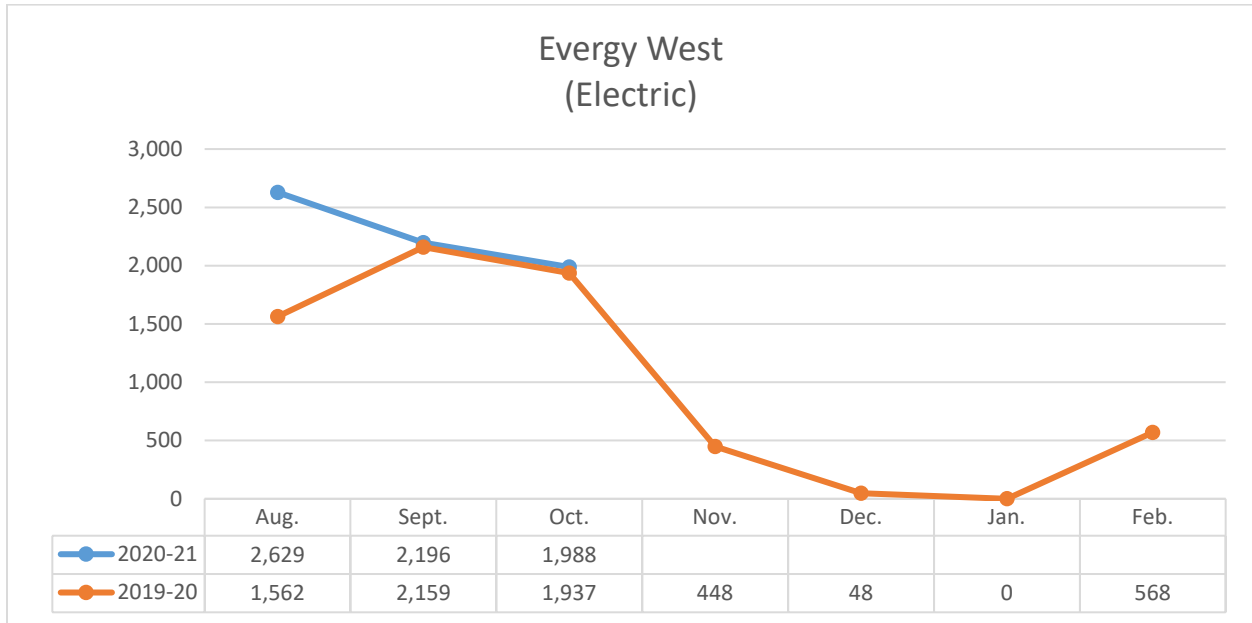
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 195% more Evergy Metro customers who participated in payment plans in October 2020 versus October 2019 and about 4% less in October 2020 than in September 2020.

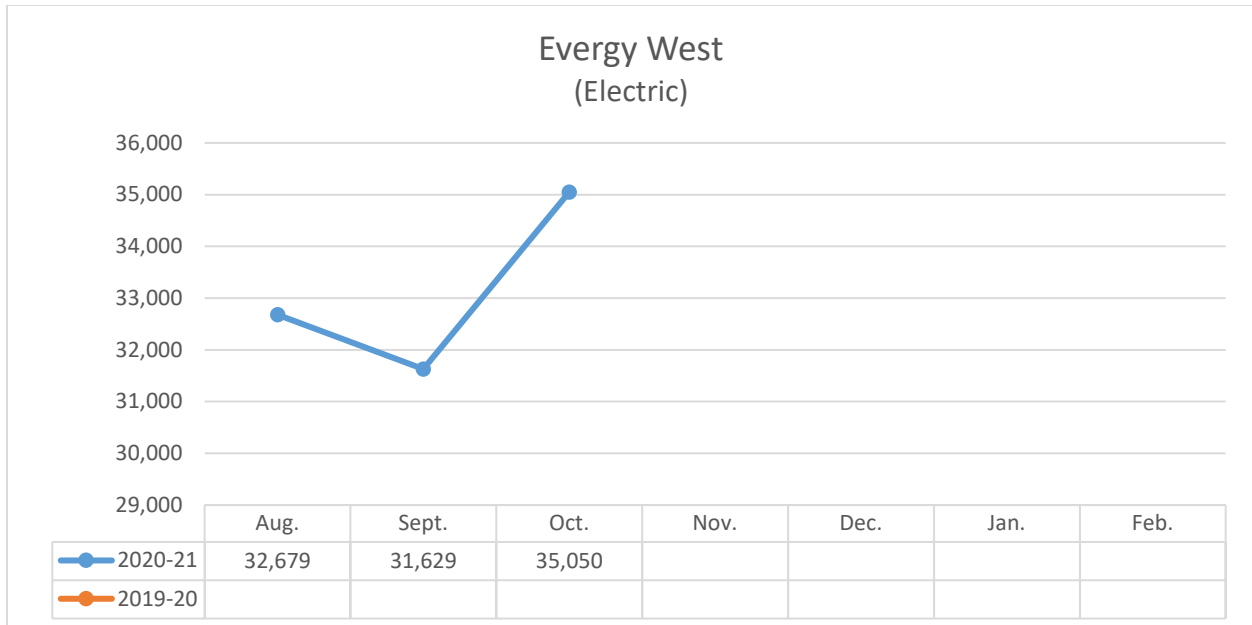
Questions 1 & 3 (Evergy West – Electric)

a) The number of disconnections for non-payment of services as of each month-end



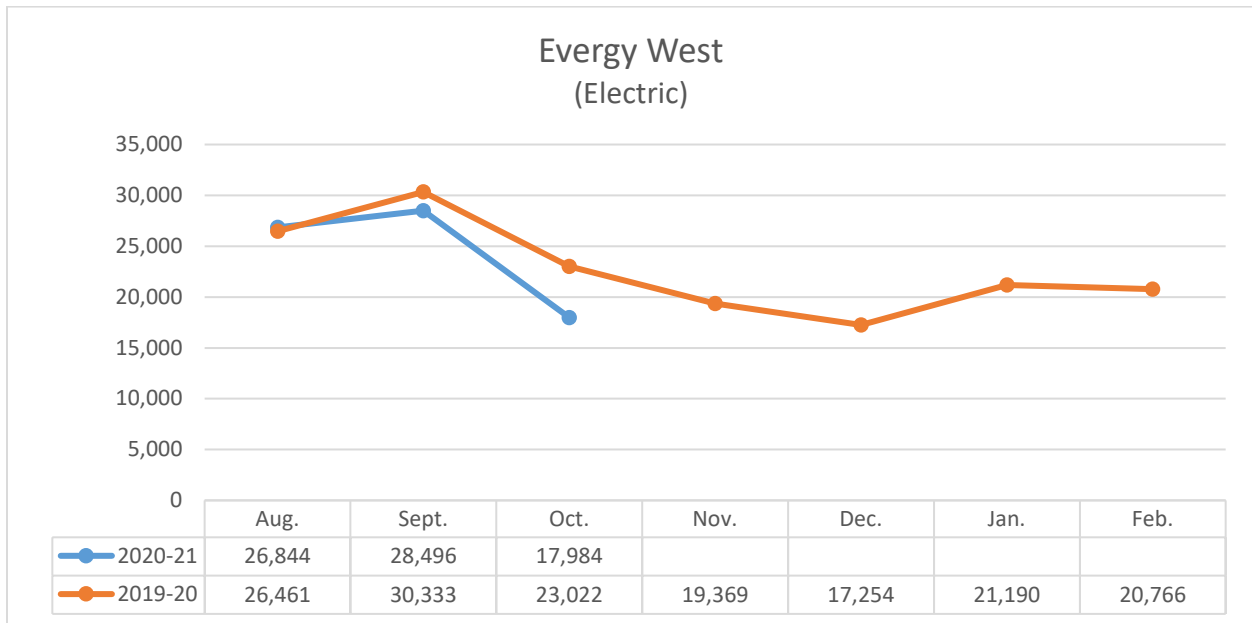
As shown in the previous graph, Evergy West performed approximately 3% more disconnections for non-payment in October 2020 versus October 2019 and about 10% fewer in October 2020 than in September 2020.

b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”



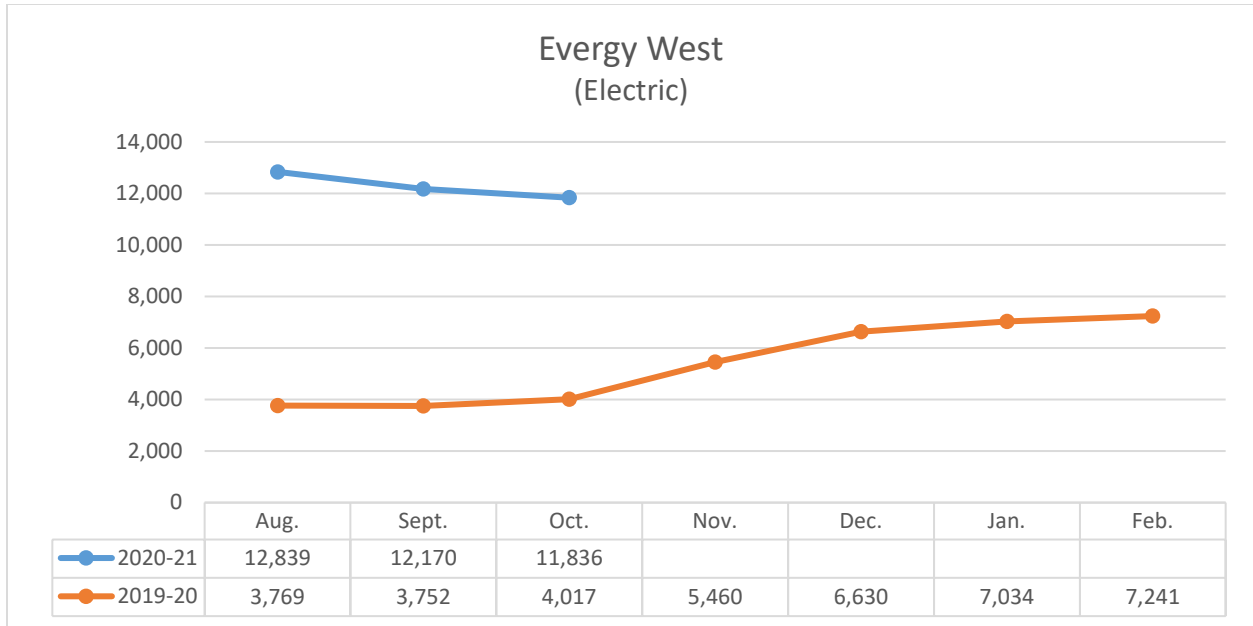
The previous data indicates that there were about 11% more Evergy West customers with past-due accounts in October 2020 versus September 2020. Evergy West indicated it is unable to provide comparable past-due data for August 2019 to February 2020. Evergy West defines past-due accounts as accounts that are more than 30 days in arrears.

c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



As shown by Evergy West’s data, for those customers who received a final disconnection notice there were about 22% fewer customers who were not disconnected in October 2020 versus October 2019 and approximately 37% less in October 2020 than in September 2020.

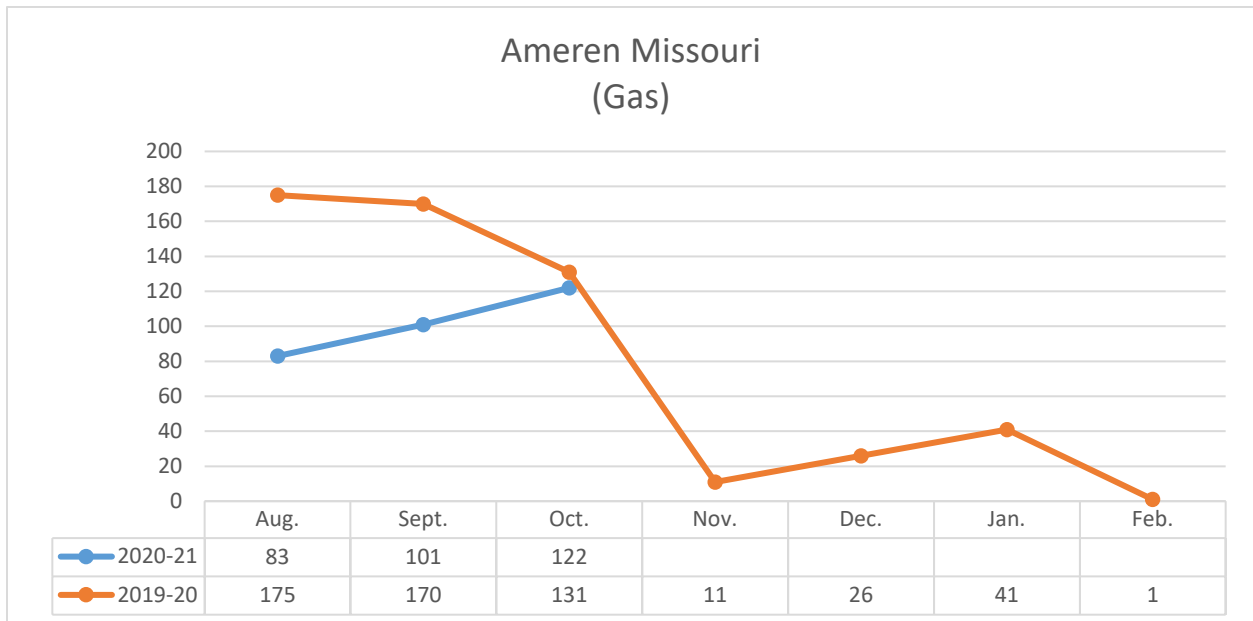
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 195% more Evergy West customers who participated in payment plans in October 2020 versus October 2019 and about 3% less in October 2020 than in September 2020.

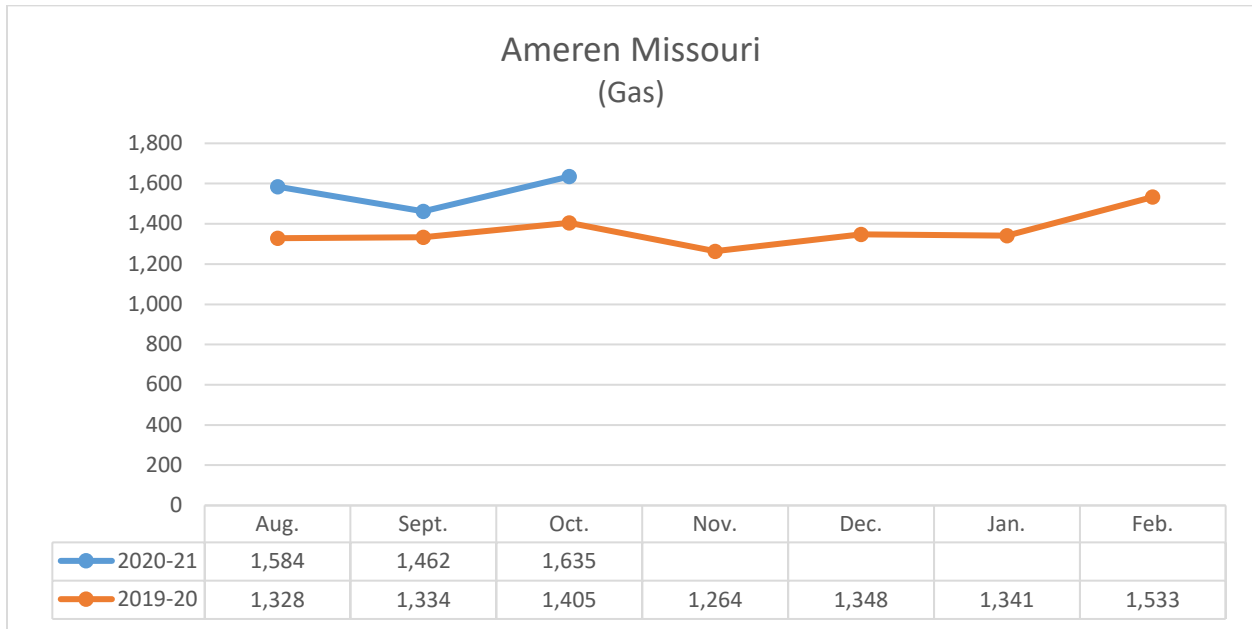
Questions 1 & 3 (Ameren Missouri – Gas)

a) The number of disconnections for non-payment of services as of each month-end



As shown in the previous graph, Ameren Missouri performed approximately 7% fewer disconnections for non-payment in October 2020 versus October 2019 and about 21% more in October 2020 than in September 2020.

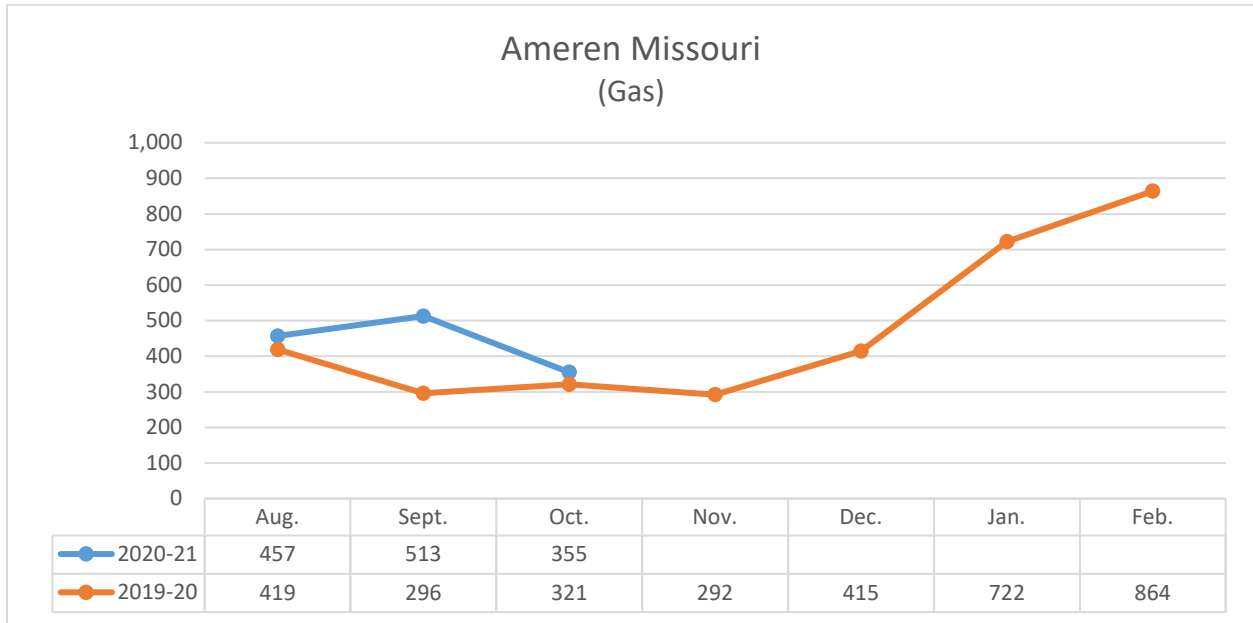
b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”



The previous data indicates that there were about 16% more Ameren Missouri customers with past-due accounts in October 2020 versus October 2019 and about 12% more in October 2020 than in September 2020. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

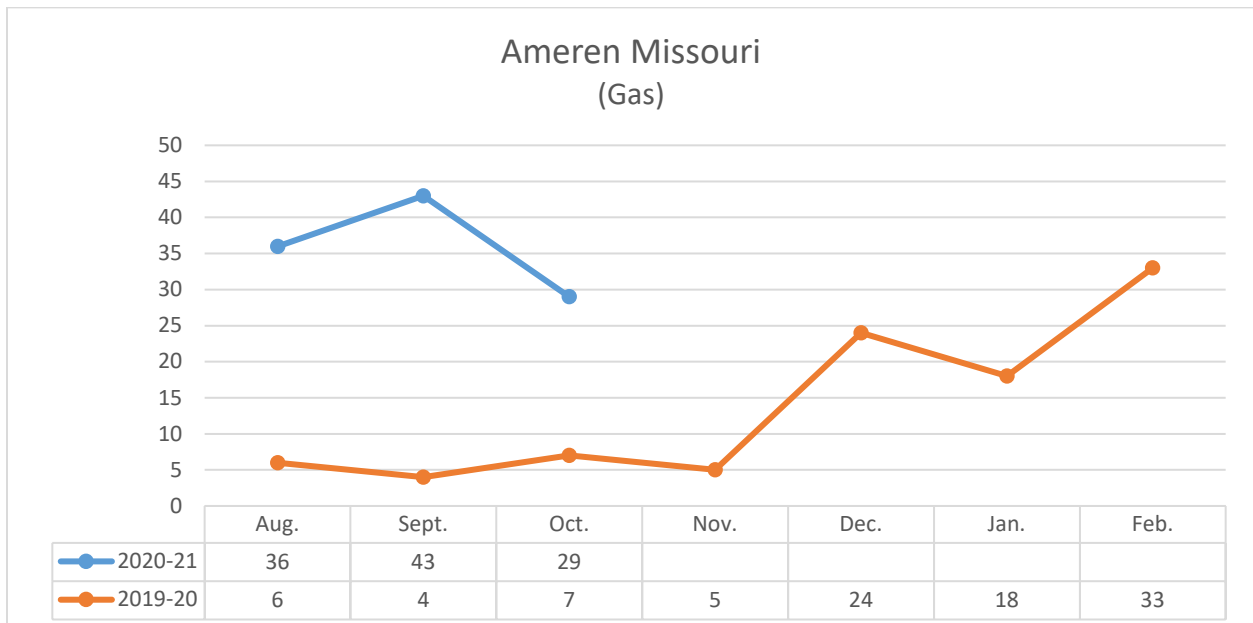
Ameren Missouri – Gas submitted some revised data for Question 1c for August and September 2020 when it provided its October 2020 data. This corrected information is reflected in the following graph and accompanying narrative.

c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



As shown by Ameren Missouri’s data, for those customers who received a final disconnection notice there were about 11% more customers who were not disconnected in October 2020 versus October 2019 and about 31% fewer in October 2020 than in September 2020.

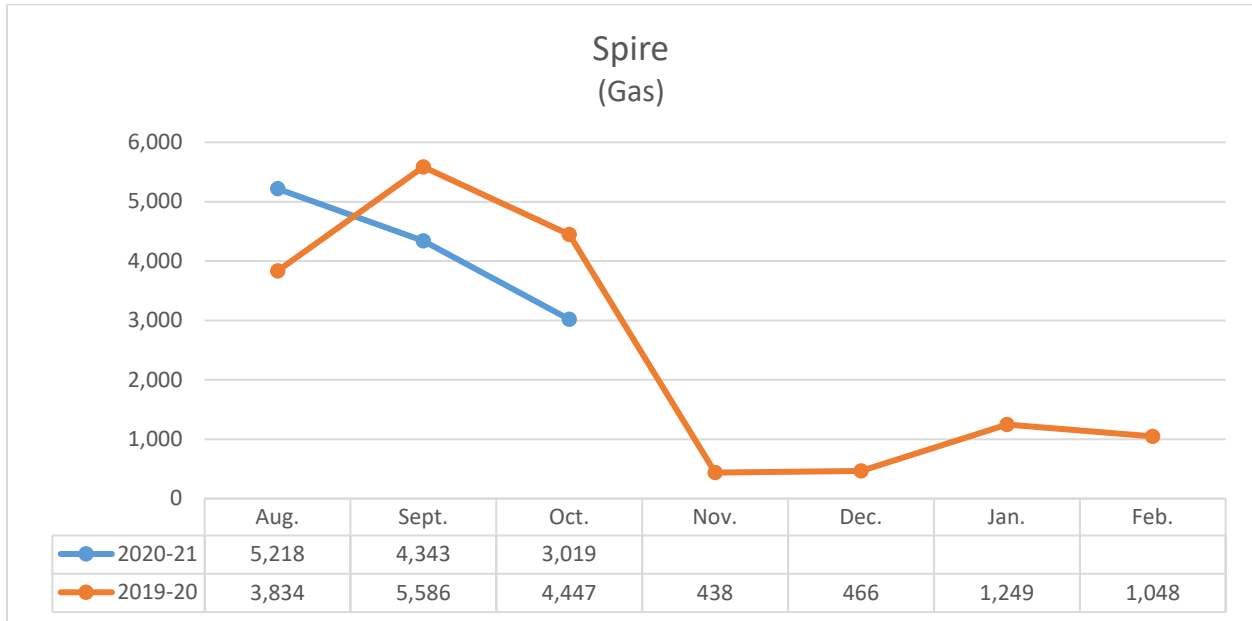
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 314% more Ameren Missouri customers who participated in payment plans in October 2020 versus October 2019 and about 33% fewer in October 2020 than in September 2020.

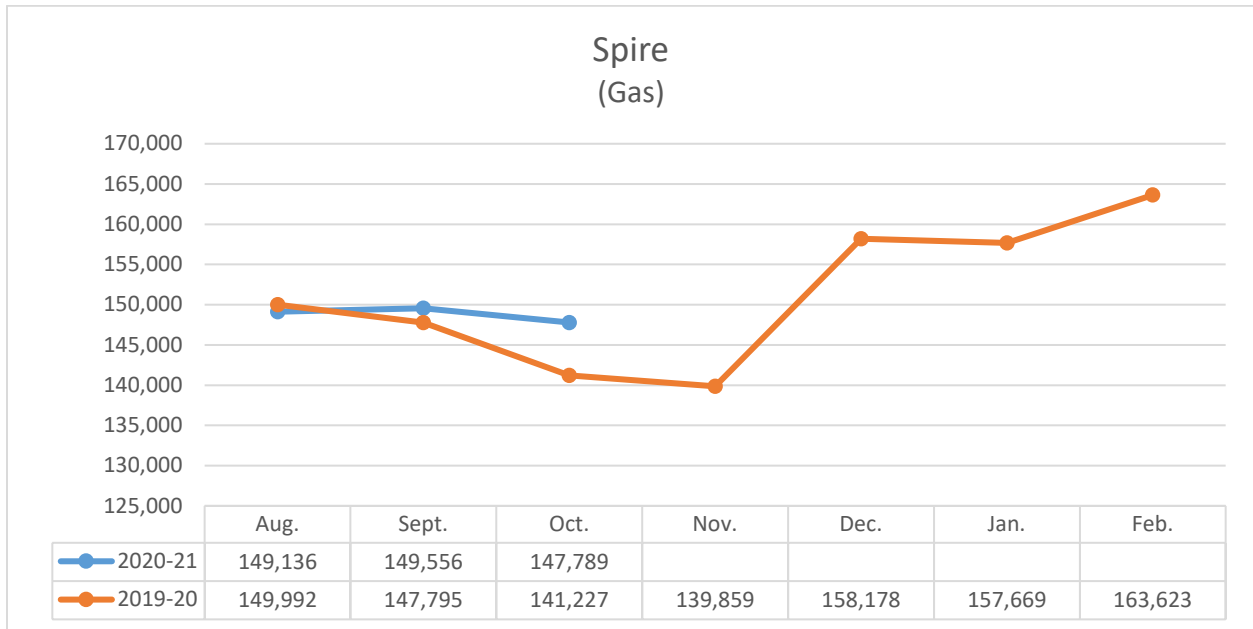
Questions 1 & 3 (Spire - Gas)

a) The number of disconnections for non-payment of services as of each month-end



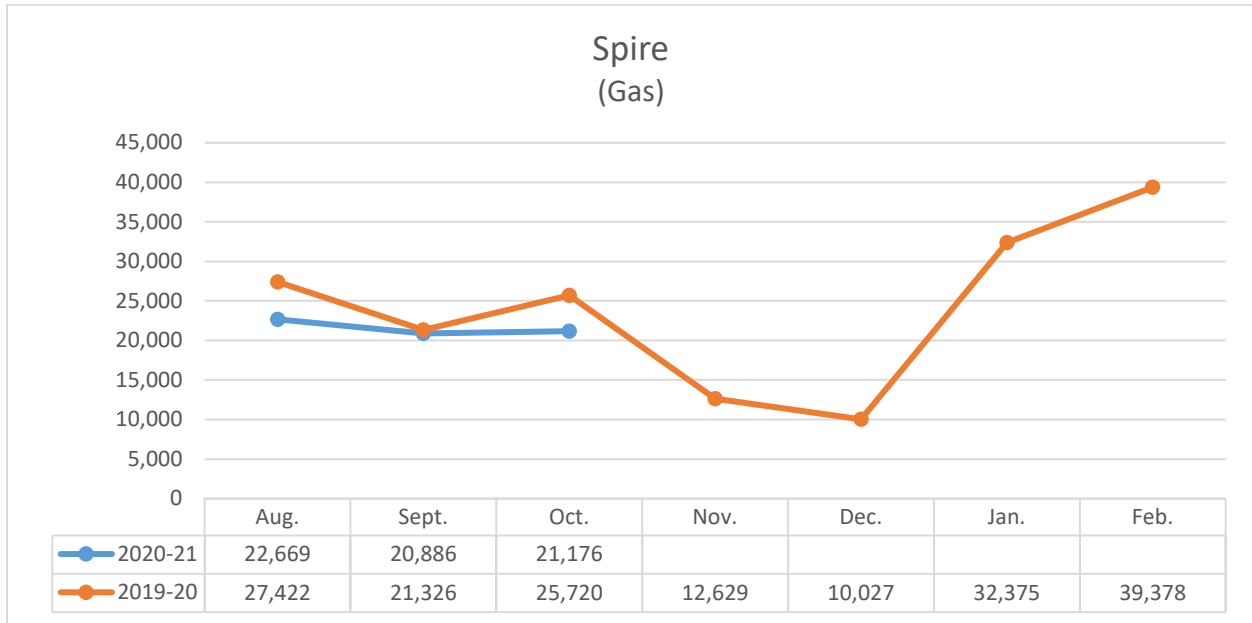
As shown in the previous graph, Spire performed approximately 32% fewer disconnections for non-payment in October 2020 versus October 2019 and approximately 31% less in October 2020 than in September 2020.

b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”



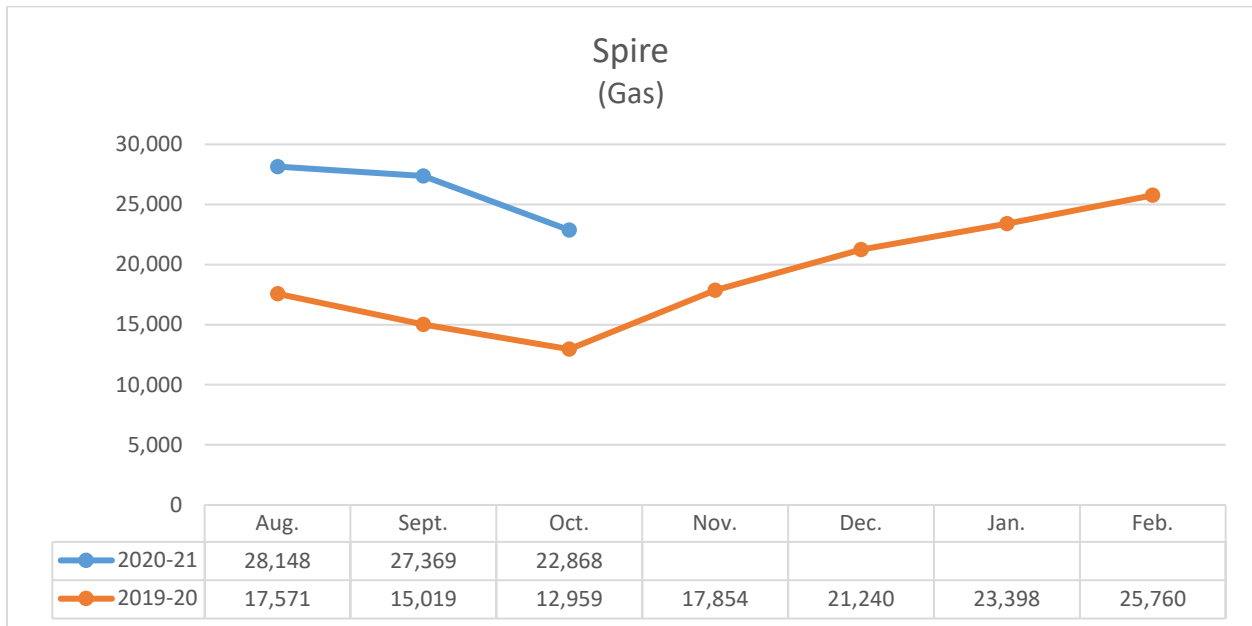
The previous data indicates that there were about 5% more Spire customers with past-due accounts in October 2020 versus October 2019 and approximately 1% fewer in October 2020 than in September 2020. Spire reported that past-due accounts are defined as accounts with arrear amounts owed for over 30 days that were not final billed at month’s end.

c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



As shown by Spire’s data, for those customers who received a final disconnection notice there were about 18% fewer customers who were not disconnected in October 2020 versus October 2019 and approximately 1% more in October 2020 than in September 2020.

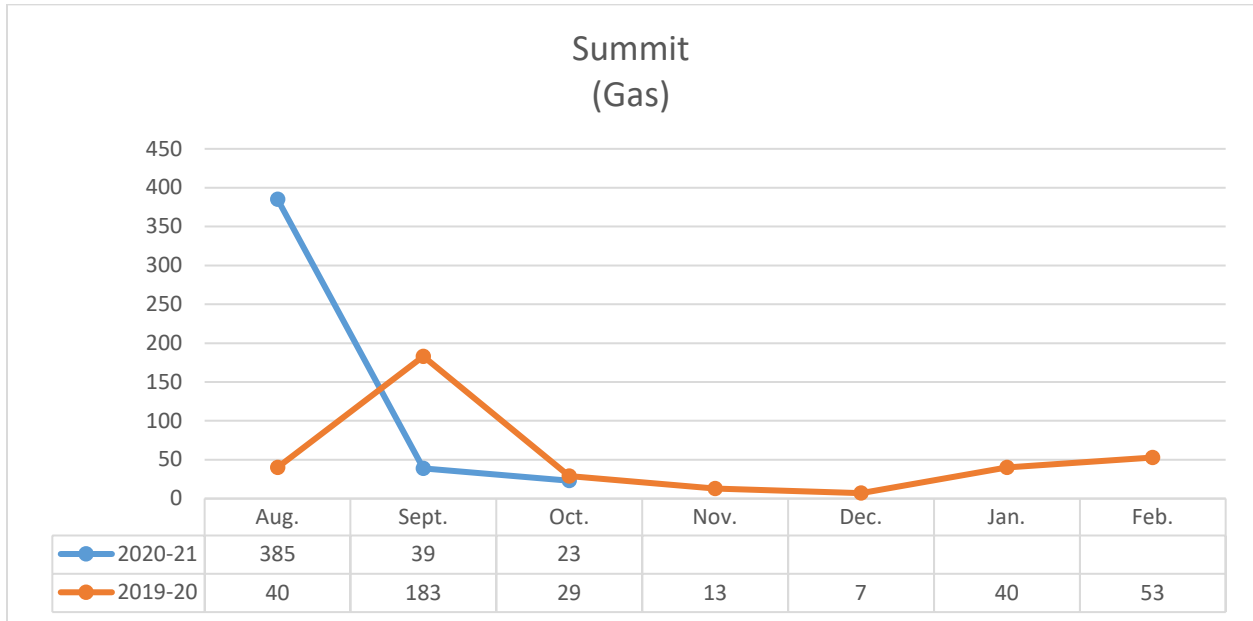
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 76% more Spire customers who participated in payment plans in October 2020 versus October 2019 and about 16% less in October 2020 than in September 2020.

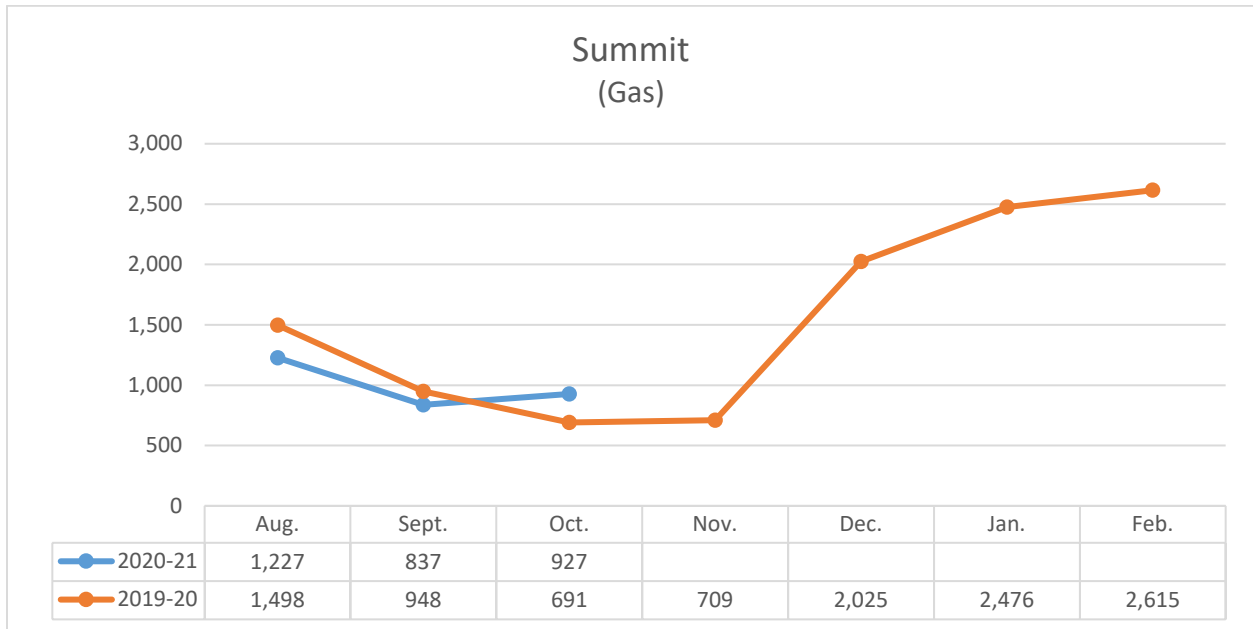
Questions 1 & 3 (Summit - Gas)

a) The number of disconnections for non-payment of services as of each month-end



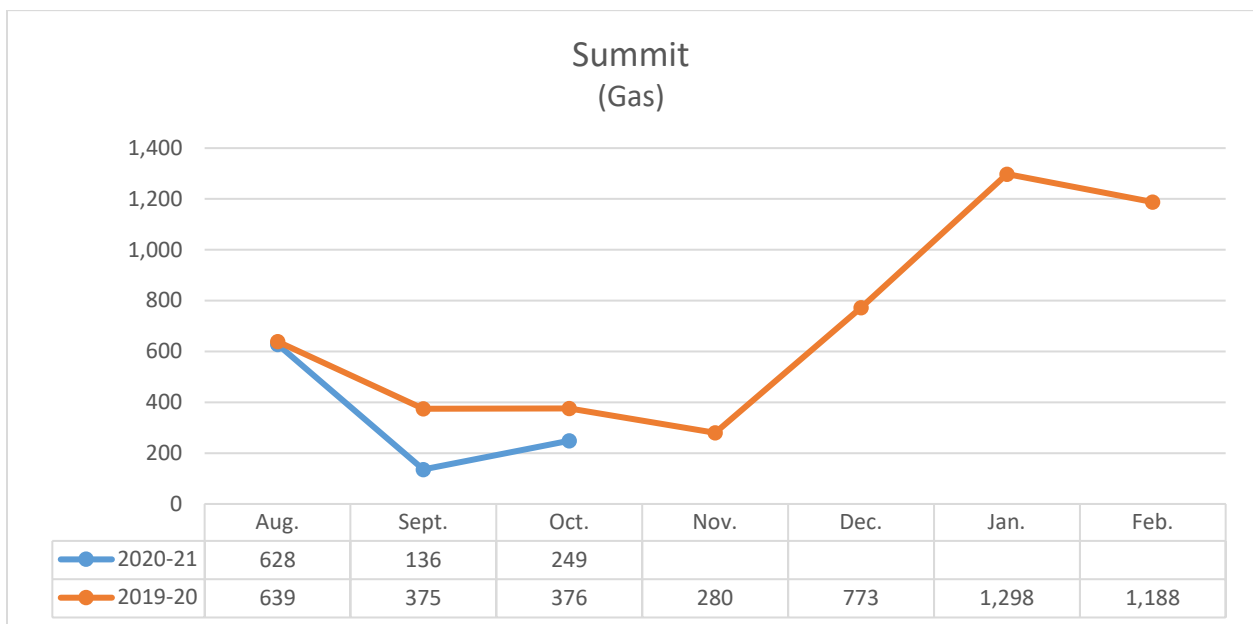
As shown in the previous graph, Summit performed approximately 21% fewer disconnections for non-payment in October 2020 versus October 2019 and about 41% less in October 2020 than in September 2020.

b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”



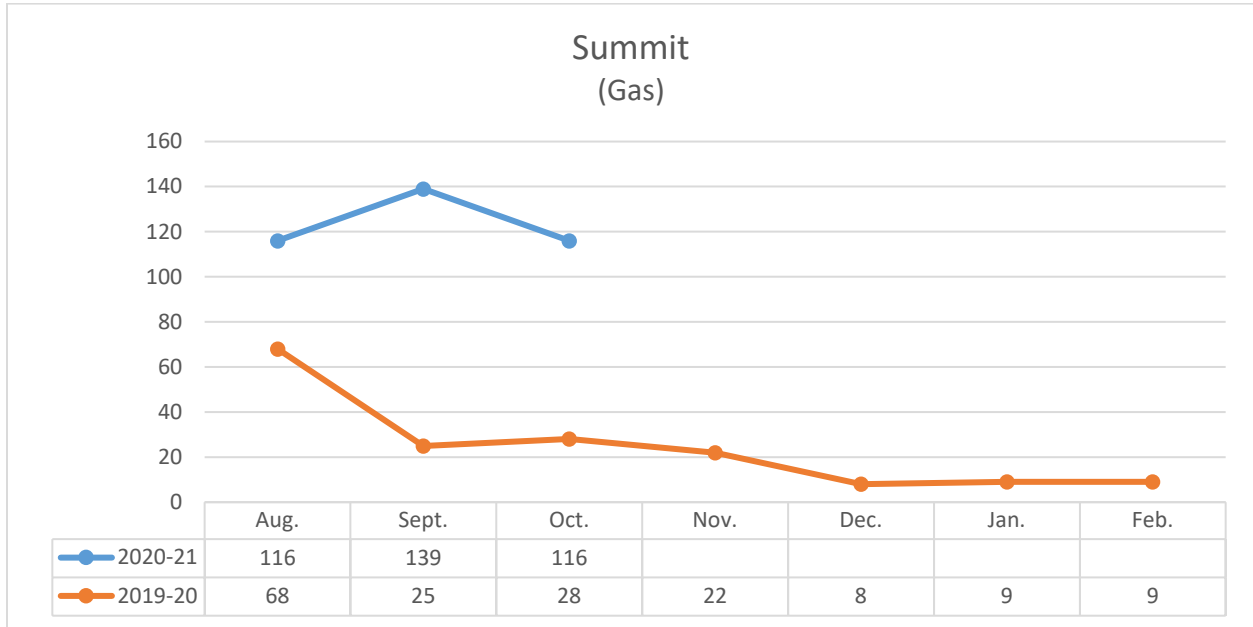
The previous data indicates that there were about 34% more Summit customers with past-due accounts in October 2020 versus October 2019 and approximately 11% more in October 2020 than in September 2020. Summit did not respond how it defines past-due accounts.

c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



As shown by Summit’s data, for those customers who received a final disconnection notice there were about 34% fewer customers who were not disconnected in October 2020 versus October 2019 and approximately 83% more in October 2020 than in September 2020.

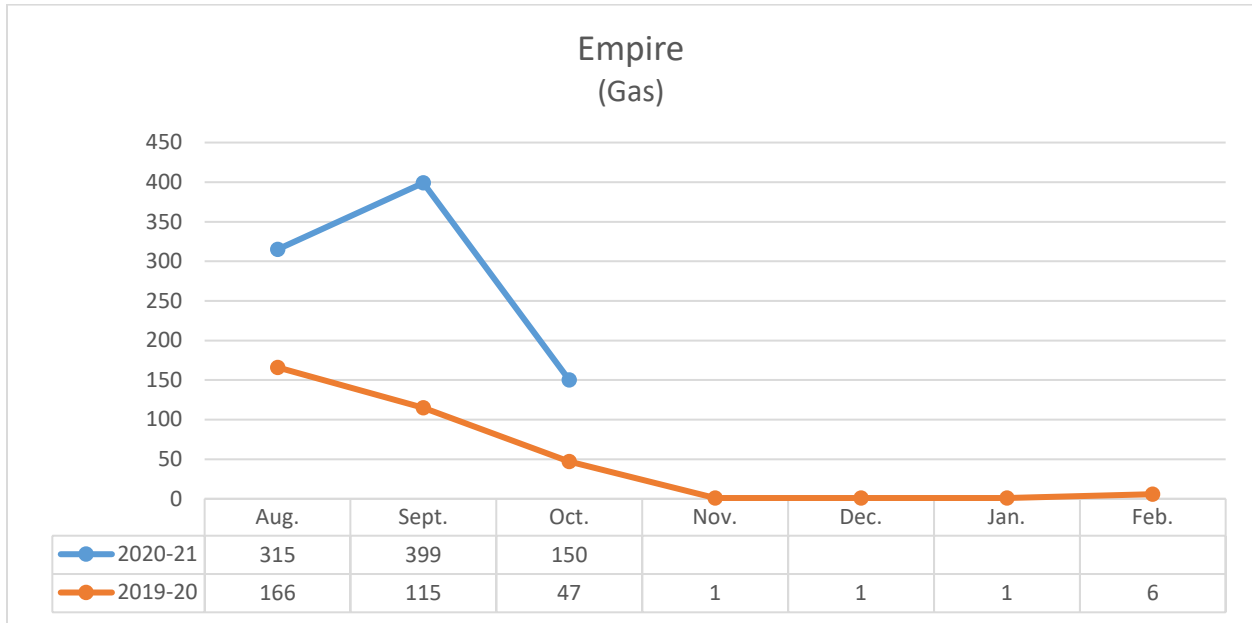
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 314% more Summit customers who participated in payment plans in October 2020 versus October 2019 and about 17% fewer in October 2020 than in September 2020.

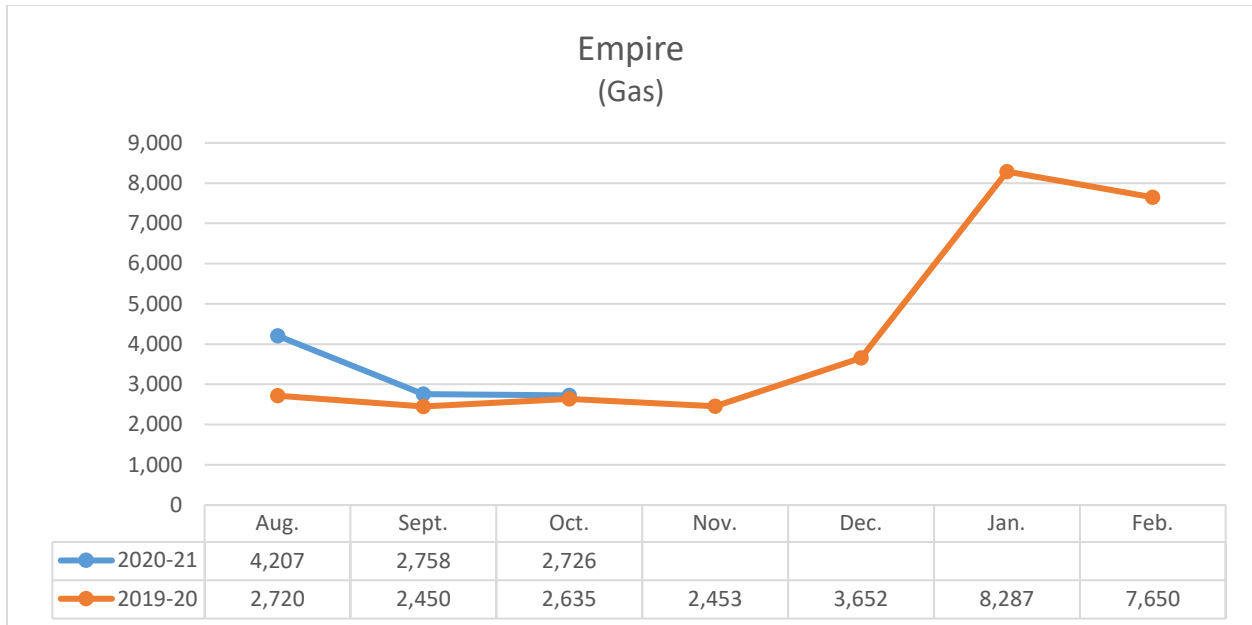
Questions 1 & 3 (Empire - Gas)

a) The number of disconnections for non-payment of services as of each month-end



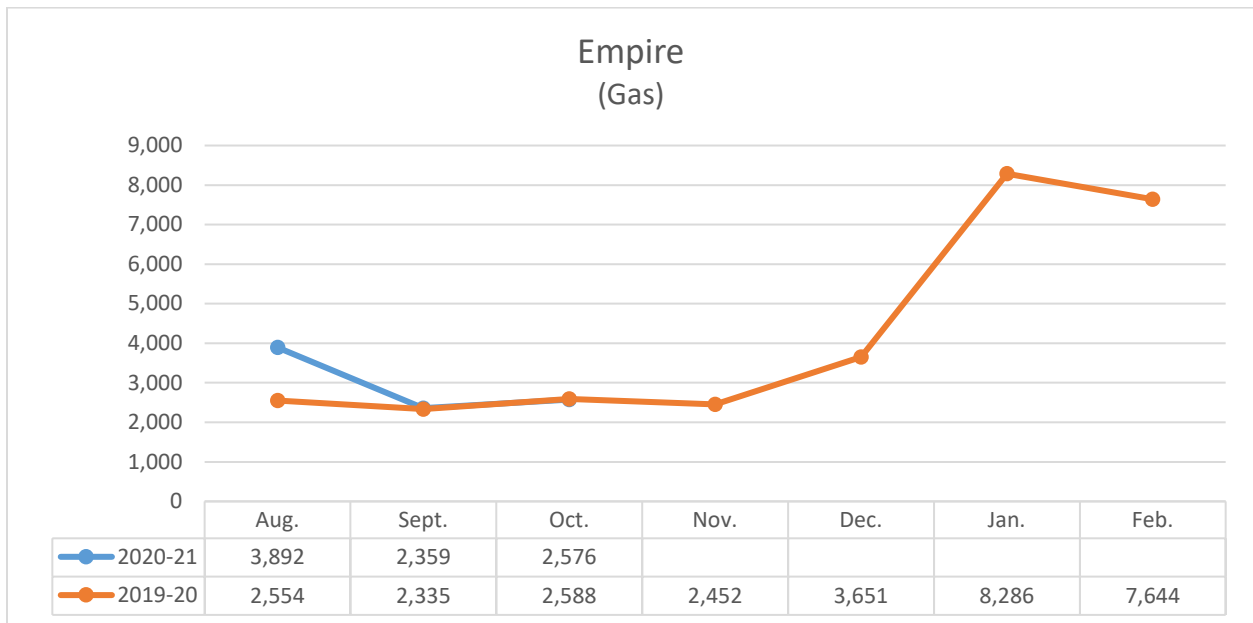
As shown in the previous graph, Empire performed approximately 219% more disconnections for non-payment in October 2020 versus October 2019 and about 62% fewer in October 2020 than in September 2020.

b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”



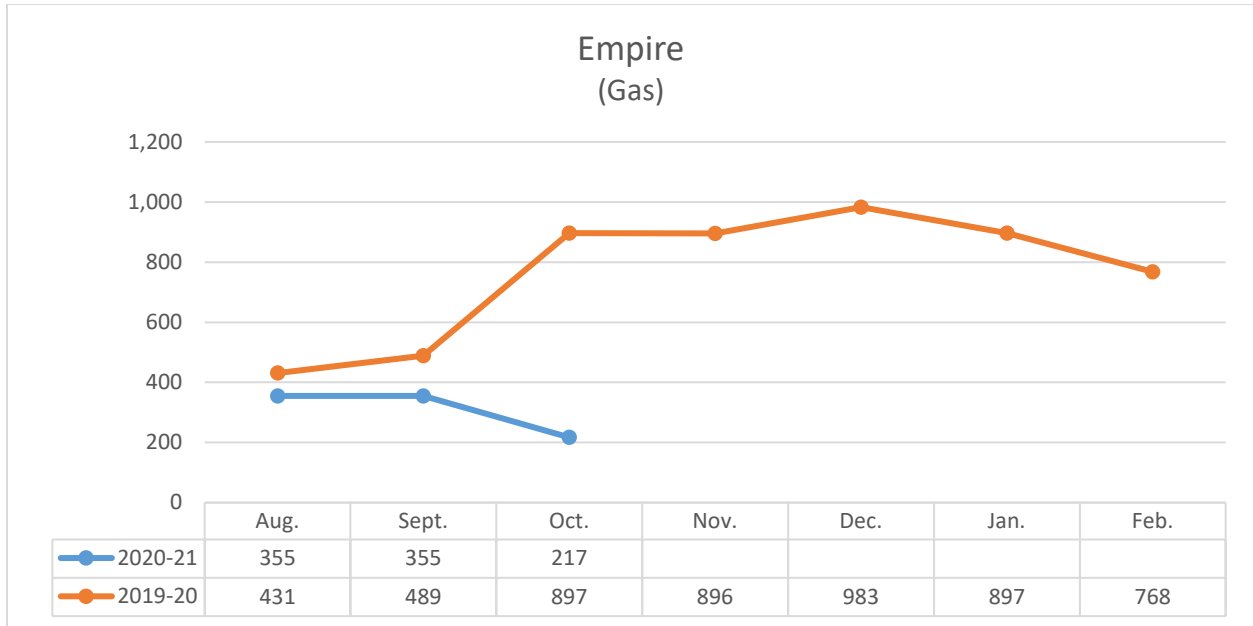
The previous data indicates that there were about 3% more Empire customers with past-due accounts in October 2020 versus October 2019 and approximately 1% fewer in October 2020 than in September 2020. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement due date.

c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



As shown by Empire’s data, for those customers who received a final disconnection notice there were about .5% fewer customers who were not disconnected in October 2020 versus October 2019 and approximately 9% more in October 2020 than in September 2020.

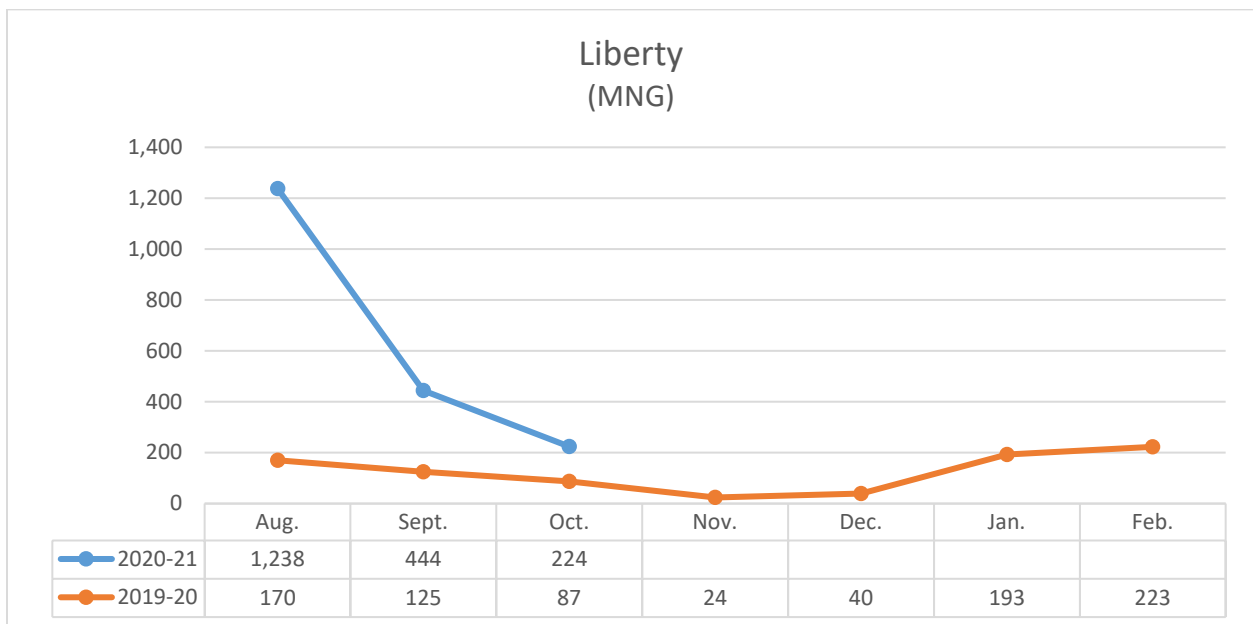
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 76% fewer Empire customers who participated in payment plans in October 2020 versus October 2019 and about 39% less in October 2020 than in September 2020.

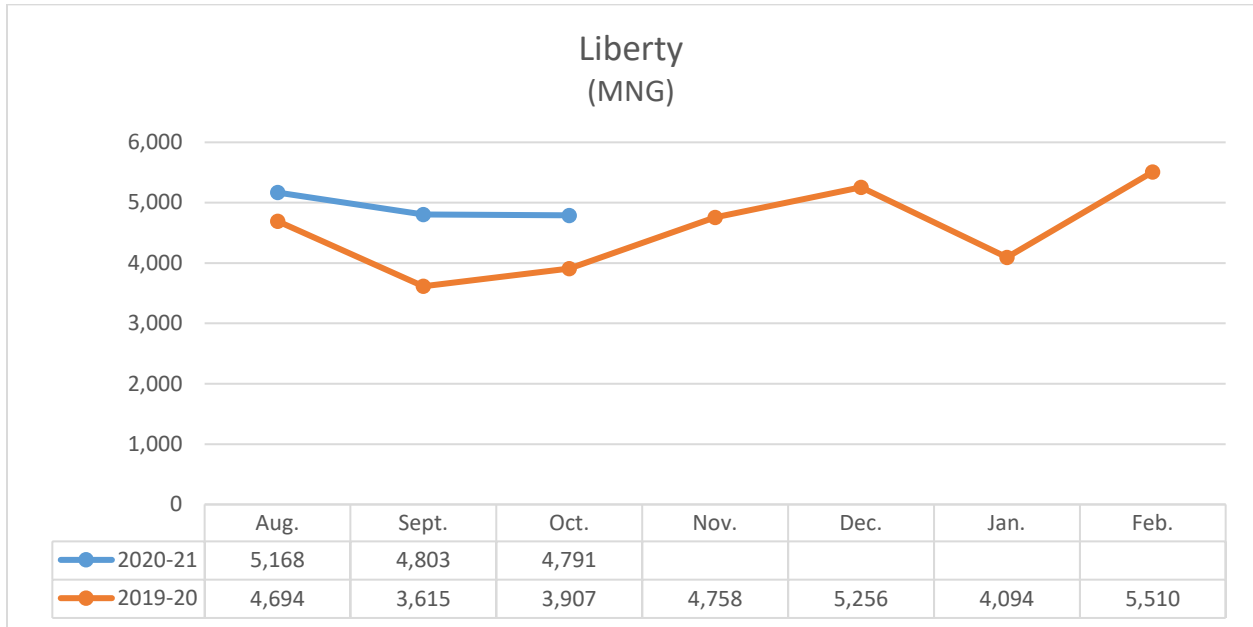
Questions 1 & 3 (Liberty - MNG - Gas)

a) The number of disconnections for non-payment of services as of each month-end



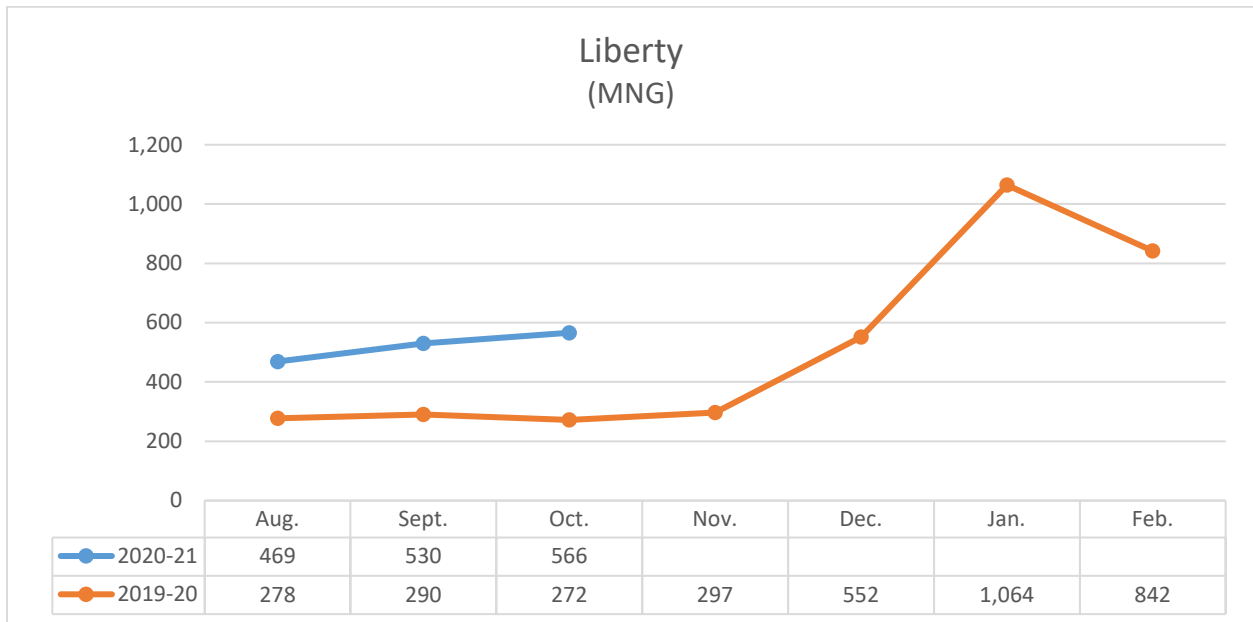
As shown in the previous graph, Liberty (MNG) performed approximately 157% more disconnections for non-payment in October 2020 versus October 2019 and about 50% less in October 2020 than in September 2020.

b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”



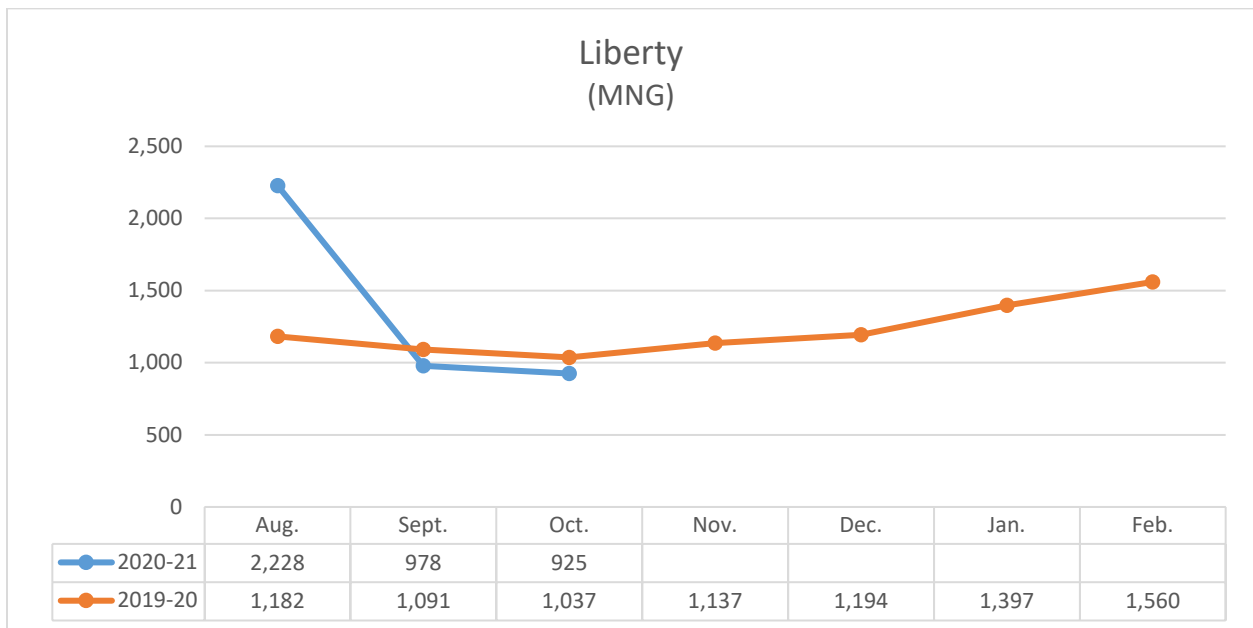
The previous data indicates that there were about 23% more Liberty (MNG) customers with past-due accounts in October 2020 versus October 2019 and approximately .2% less in October 2020 than in September 2020. Liberty (MNG) reported that it considers accounts past-due when they have a past-due balance for greater than two days and they are not on budget billing.

c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



As shown by Liberty (MNG)'s data, for those customers who received a final disconnection notice there were about 108% more customers who were not disconnected in October 2020 versus October 2019 and approximately 7% more in October 2020 than in September 2020.

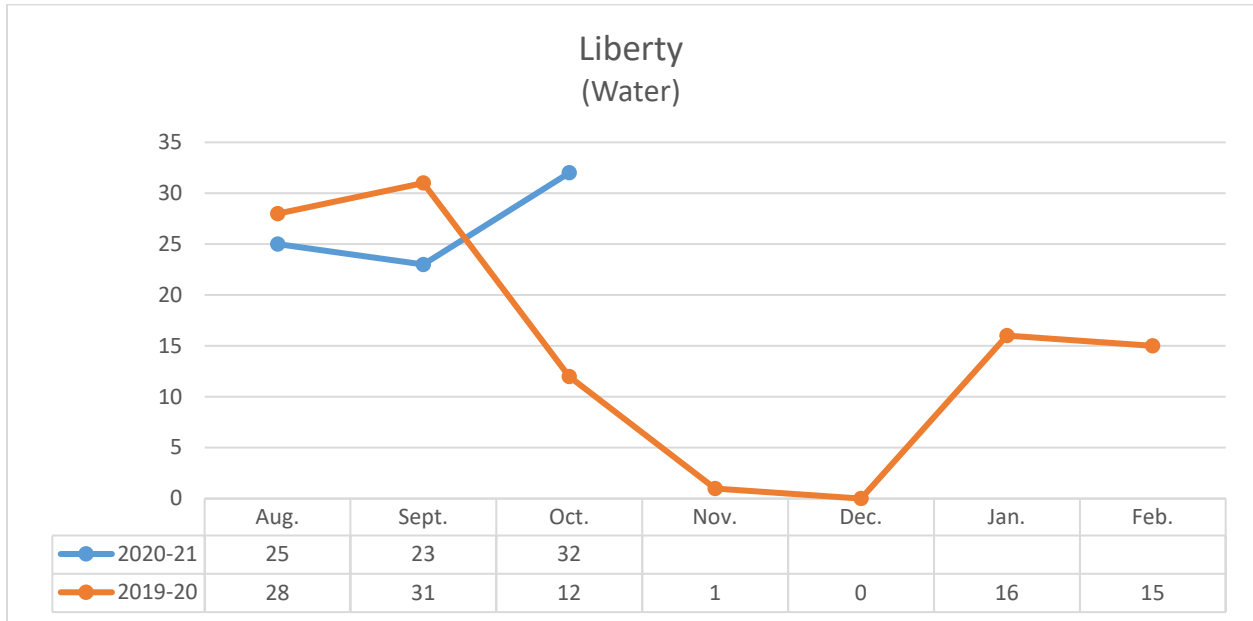
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 11% less Liberty (MNG) customers who participated in payment plans in October 2020 versus October 2019 and 5% less in October 2020 than in September 2020.

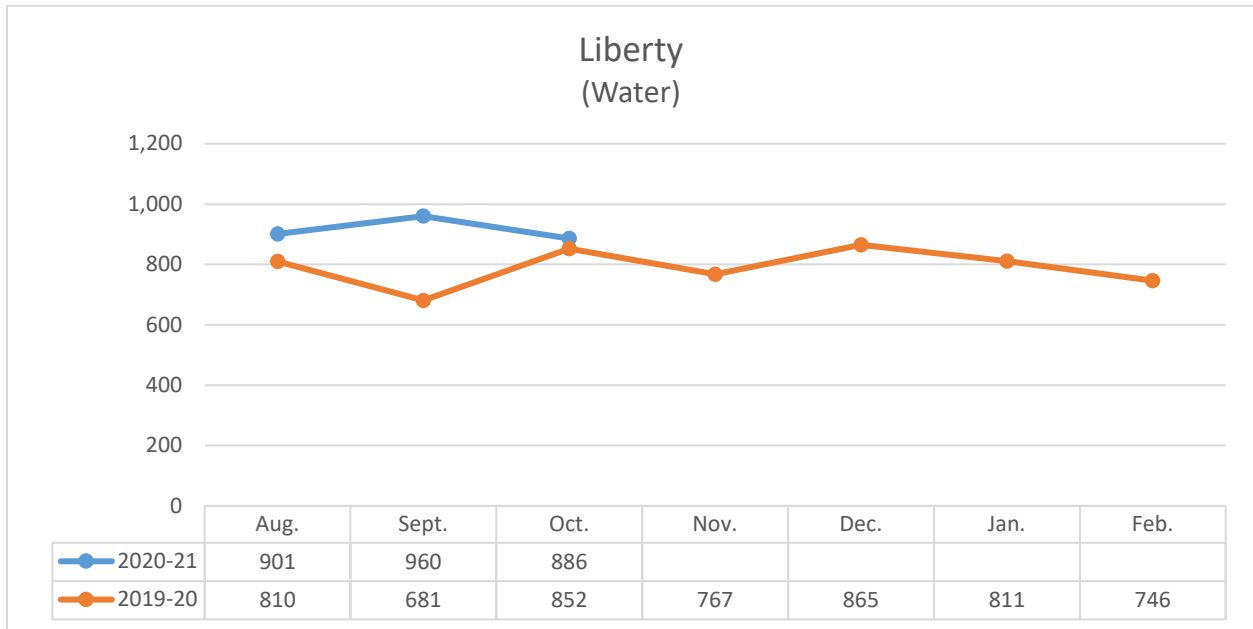
Questions 1 & 3 (Liberty - Water)

a) The number of disconnections for non-payment of services as of each month-end



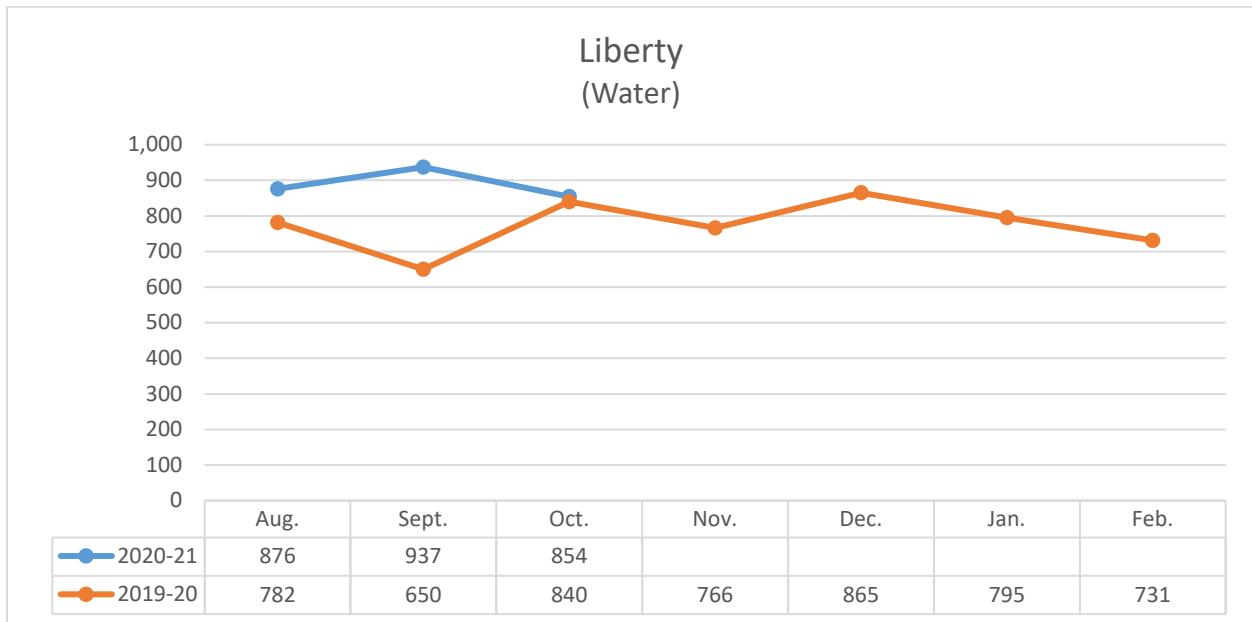
As shown in the previous graph, Liberty performed approximately 167% more disconnections for non-payment in October 2020 versus October 2019 and about 39% more in October 2020 than in September 2020.

b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”



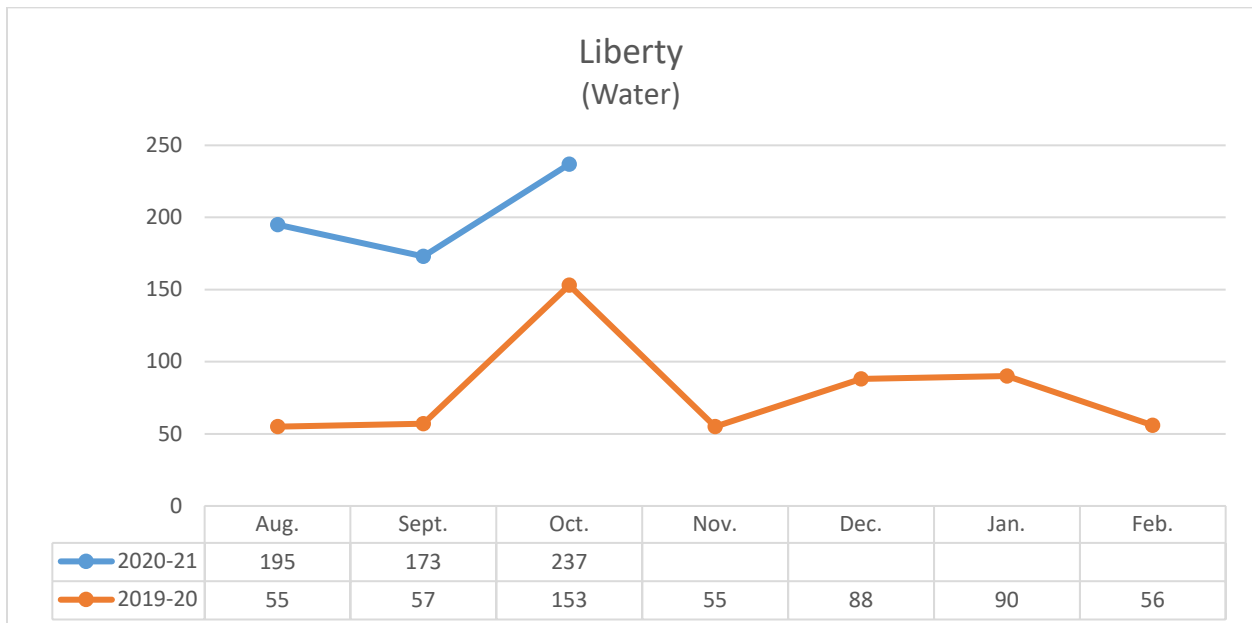
The previous data indicates that there were about 4% more Liberty customers with past-due accounts in October 2020 versus October 2019 and approximately 8% fewer in October 2020 than in September 2020. Liberty reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement due date.

c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



As shown by Liberty’s data, for those customers who received a final disconnection notice there were about 2% more customers who were not disconnected in October 2020 versus October 2019 and approximately 9% fewer in October 2020 than in September 2020.

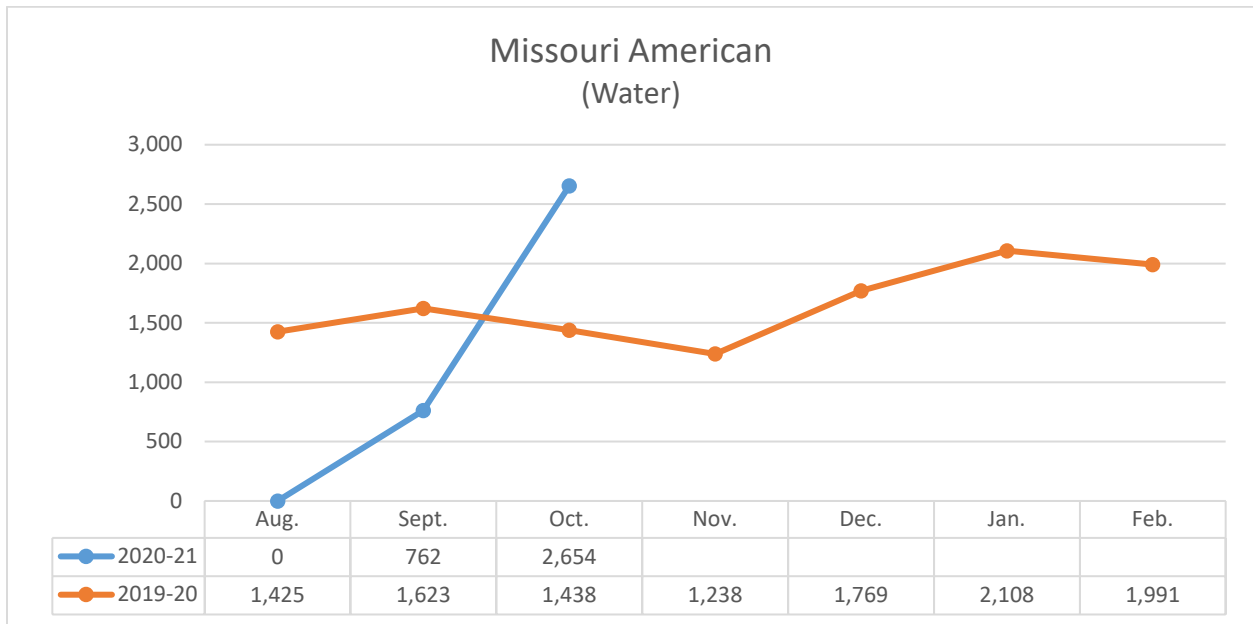
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 55% more Liberty customers who participated in payment plans in October 2020 versus October 2019 and about 37% more in October 2020 than in September 2020.

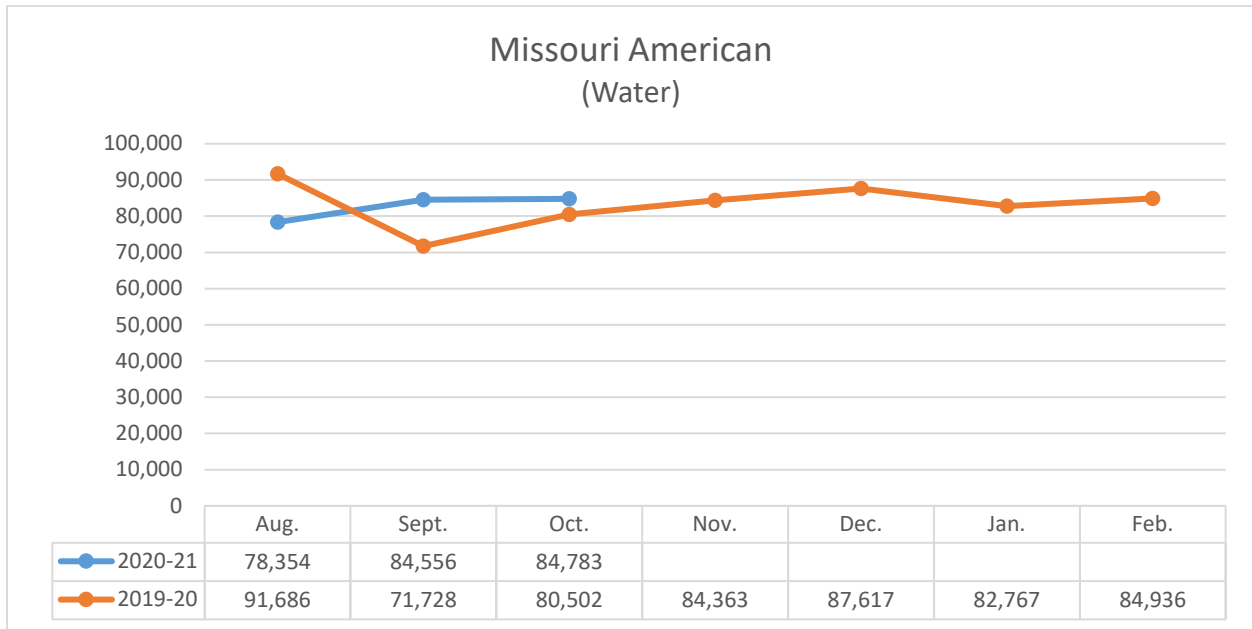
Questions 1 & 3 (Missouri American - Water)

a) The number of disconnections for non-payment of services as of each month-end



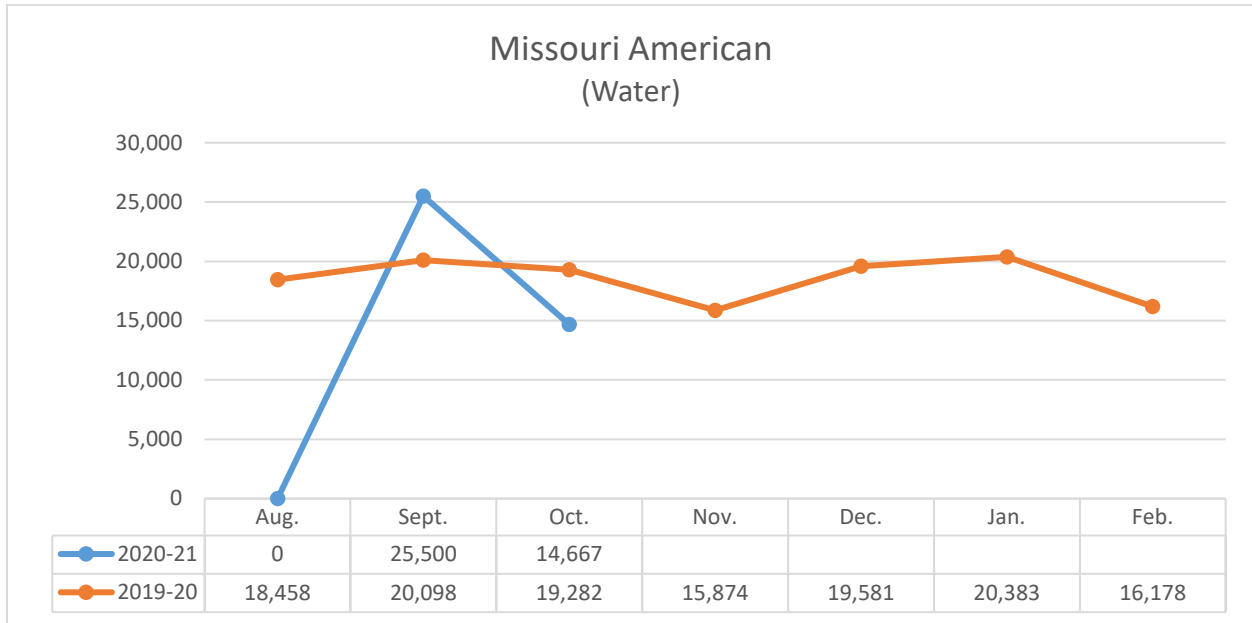
As shown in the previous graph, Missouri American performed approximately 85% more disconnections for non-payment in October 2020 versus October 2019 and about 248% more in October 2020 than in September 2020.

b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”



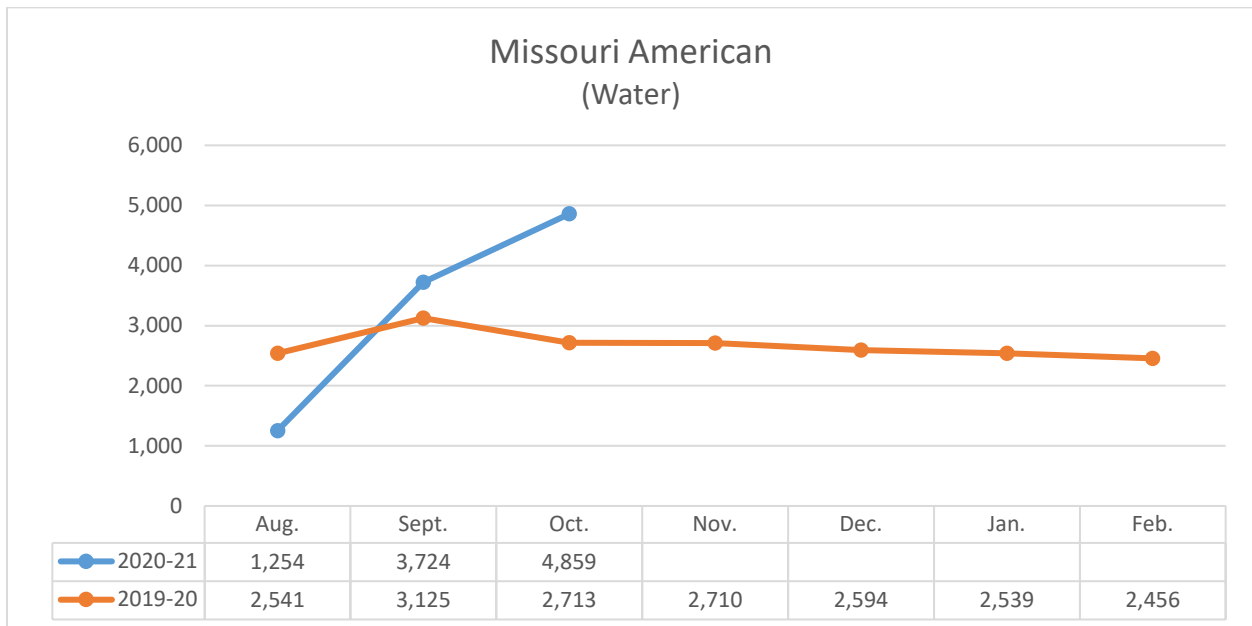
The previous data indicates that there were about 5% more Missouri American customers with past-due accounts in October 2020 versus October 2019 and approximately .3% more in October 2020 than in September 2020. Missouri American reported that it defines “past-due” as any unpaid amount past the due date on the customer bill.

c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



As shown by Missouri American’s data, for those customers who received a final disconnection notice there were about 24% fewer customers who were not disconnected in October 2020 versus October 2019 and approximately 43% less in October 2020 than in September 2020.

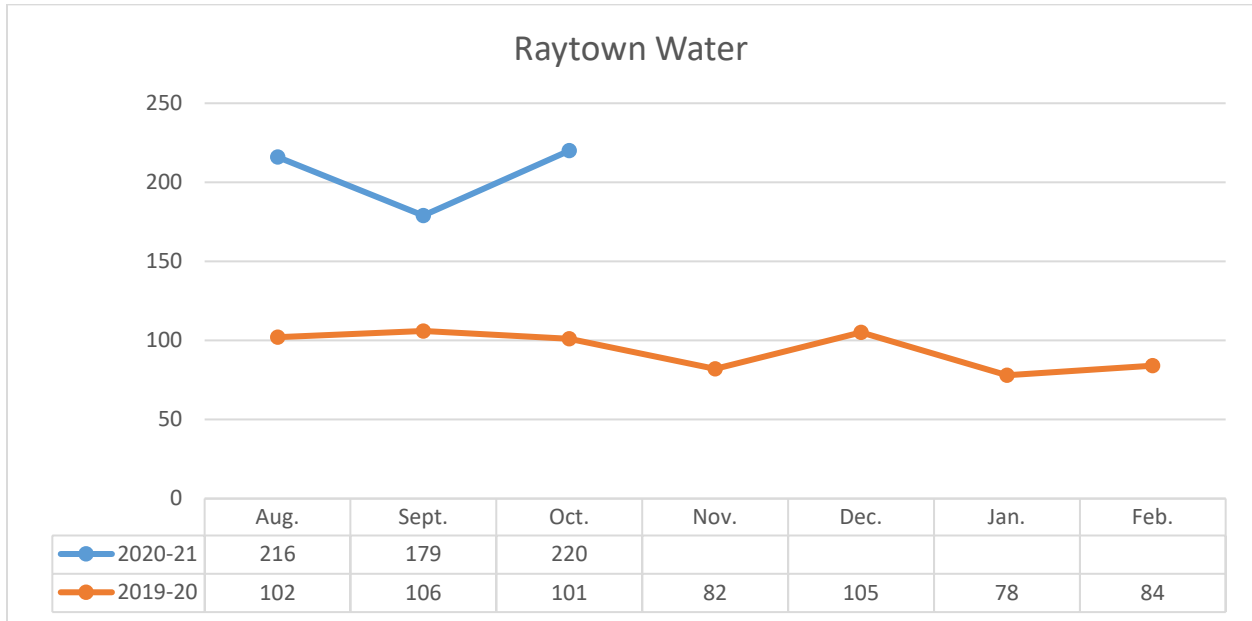
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 79% more Missouri American customers who participated in payment plans in October 2020 versus October 2019 and about 31% more in October 2020 than in September 2020.

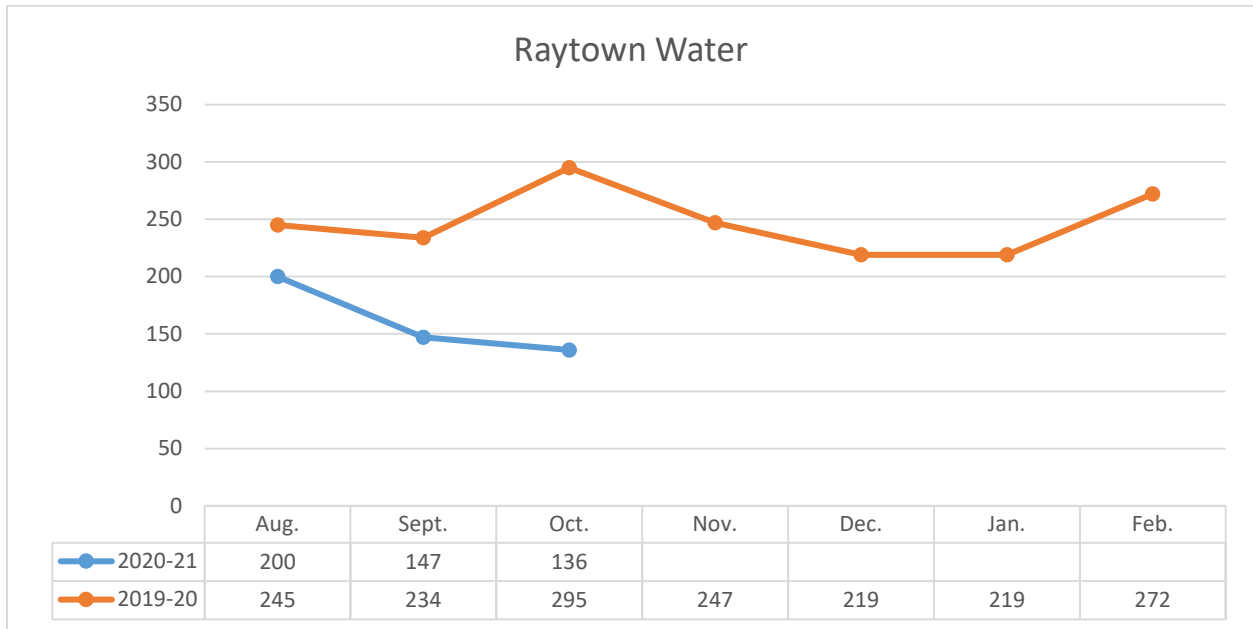
Questions 1 & 3 (Raytown Water)

a) The number of disconnections for non-payment of services as of each month-end



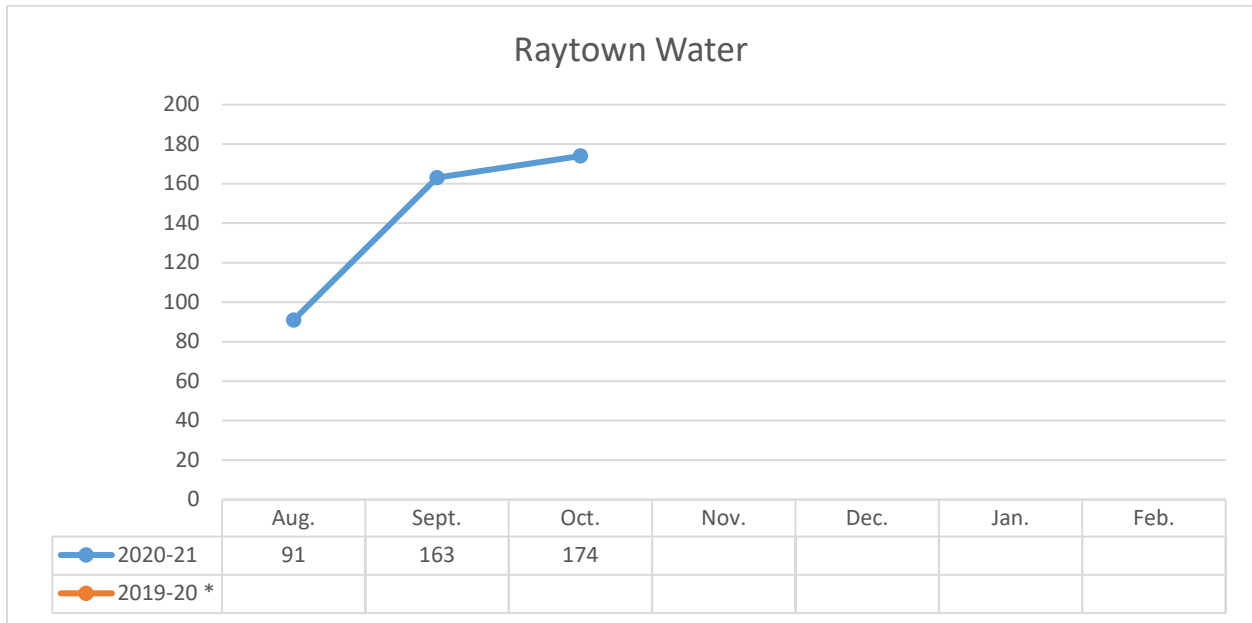
As shown in the previous graph, Raytown Water performed approximately 118% more disconnections for non-payment in October 2020 versus October 2019 and about 23% more in October 2020 than in September 2020.

b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”



The previous data indicates that there were about 54% fewer Raytown Water customers with past-due accounts in October 2020 versus October 2019 and approximately 8% less in October 2020 than in September 2020. Raytown Water reported that it defines “past-due” as accounts with balances that are over 31 days.

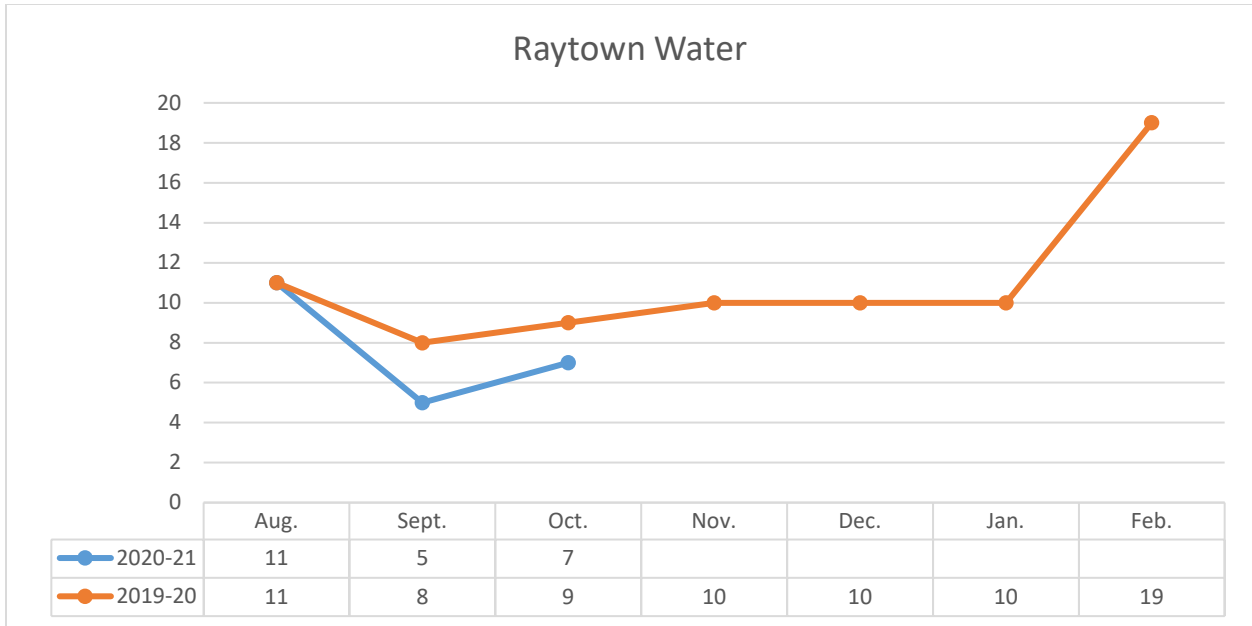
c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



* Raytown Water responded in Data Request No. 0009 that this information is not readily available.

As shown by Raytown Water’s data, 174 customers received a final disconnection notice in August 2020 but were not disconnected for non-payment of service. The Company’s data request response stated that this information was not readily available for the August 2019 through February 2019 time period. Raytown Water had approximately 7% more customer that received a final disconnection notice but were not disconnected for non-payment of service in October 2020 than in September 2020.

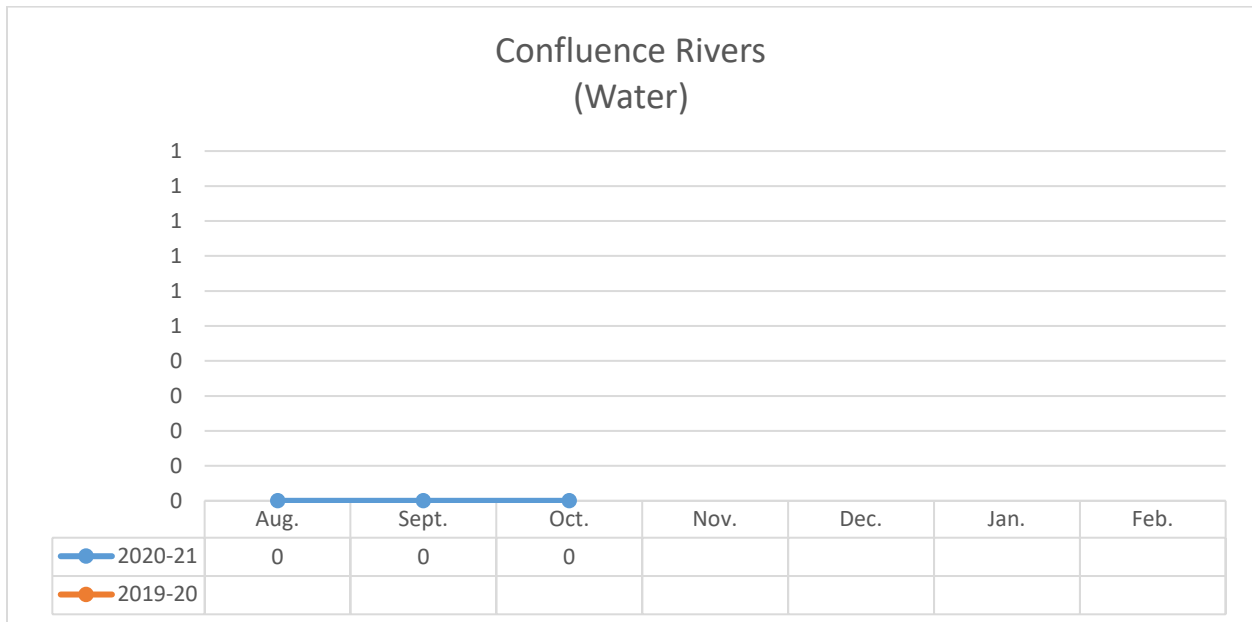
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 22% fewer Raytown Water customers who participated in payment plans in October 2020 versus October 2019 and about 40% more in October 2020 than in September 2020.

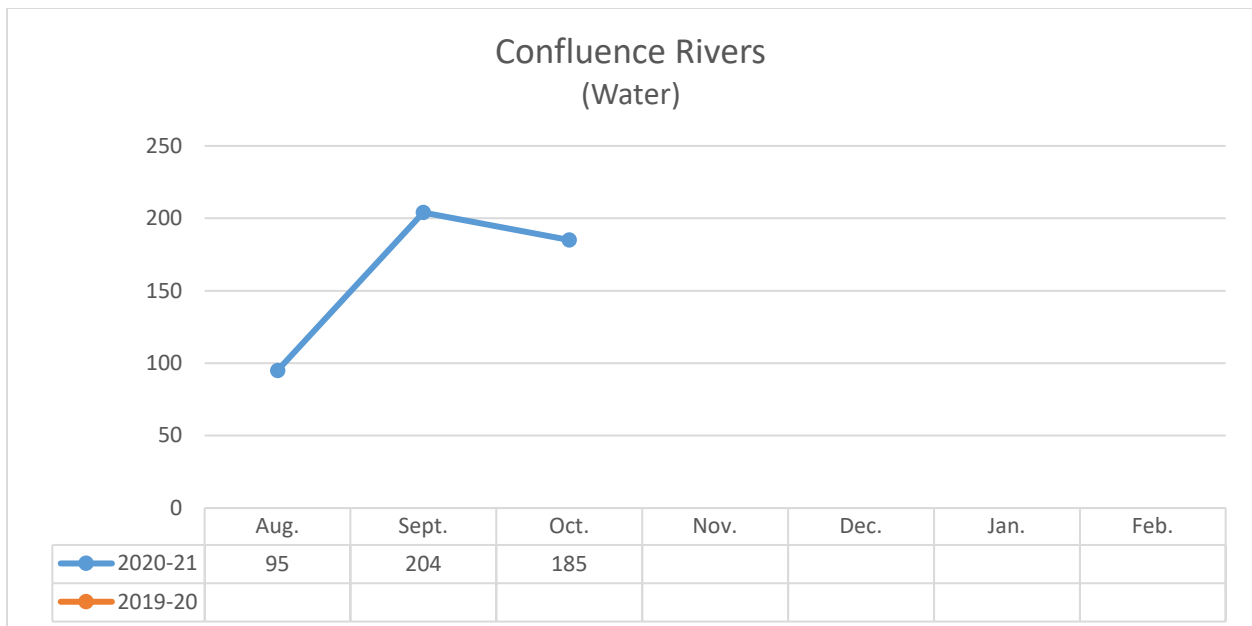
Questions 1 & 3 (Confluence Rivers - Water)

a) The number of disconnections for non-payment of services as of each month-end



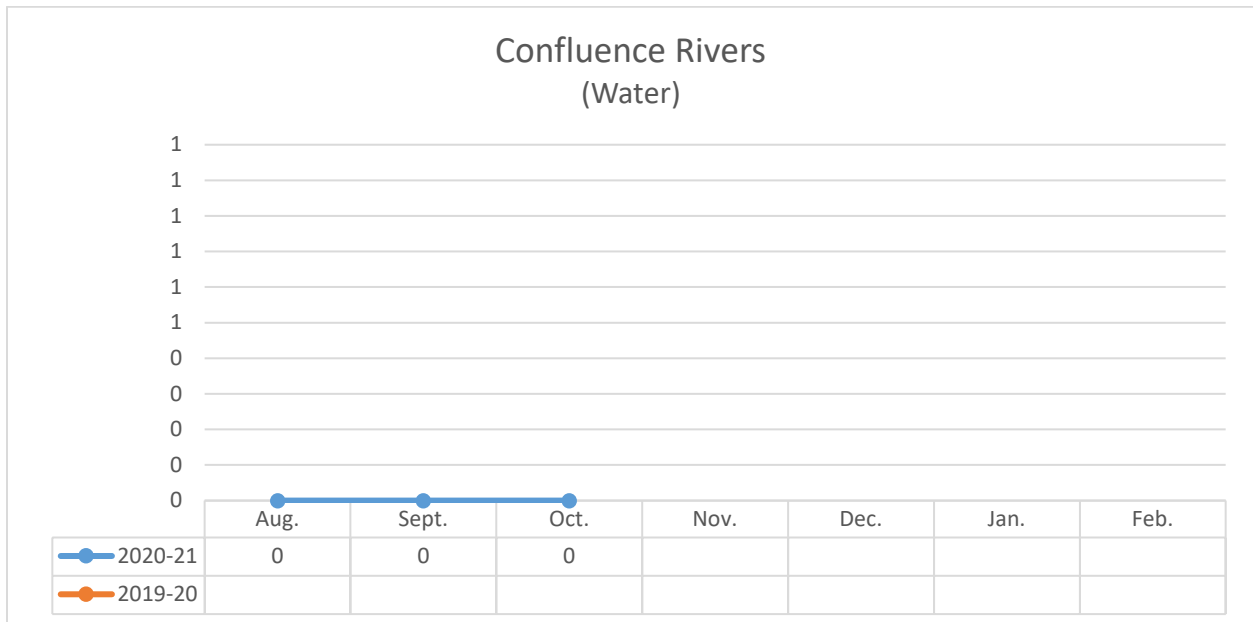
As shown in the previous graph, Confluence Rivers performed no disconnections in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 24 disconnections was performed.

b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”



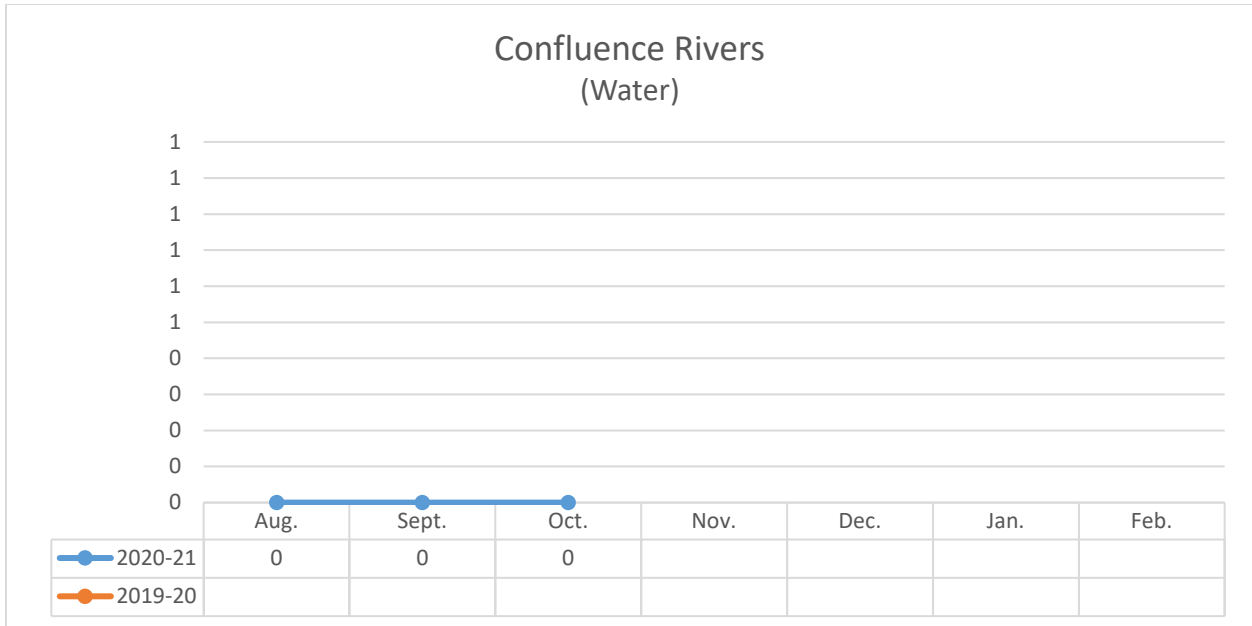
The previous data indicates there were about 9% fewer Confluence Rivers customers with past-due accounts in October 2020 versus September 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 37 customers with “past-due” accounts during this time period. Confluence Rivers reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid.

c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



As shown by Confluence Rivers data, no customers received a final disconnection notice in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 13 customers who received final disconnection notices but were not disconnected during this time period.

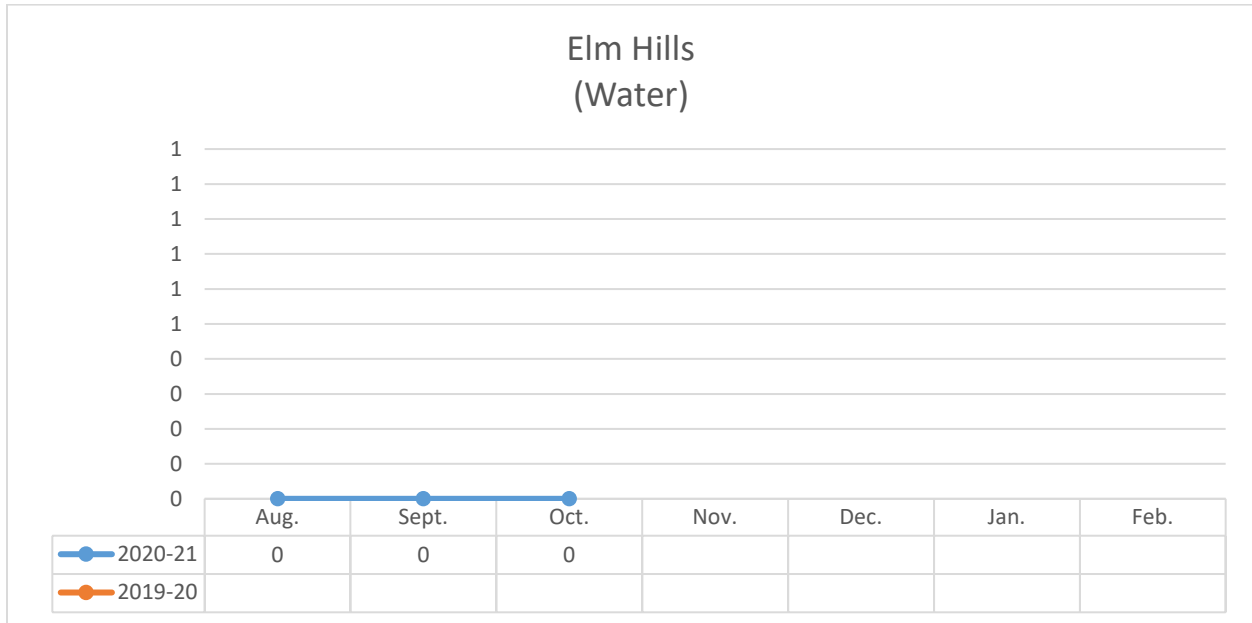
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were no Confluence Rivers customers who participated in payment plans in October 2020. The Company indicated that it will begin offering payment plans in November 2020. No monthly, comparative data was provided for August 2019 to February 2020, although the Company reported there were no customers who participated in payment plans during this time period.

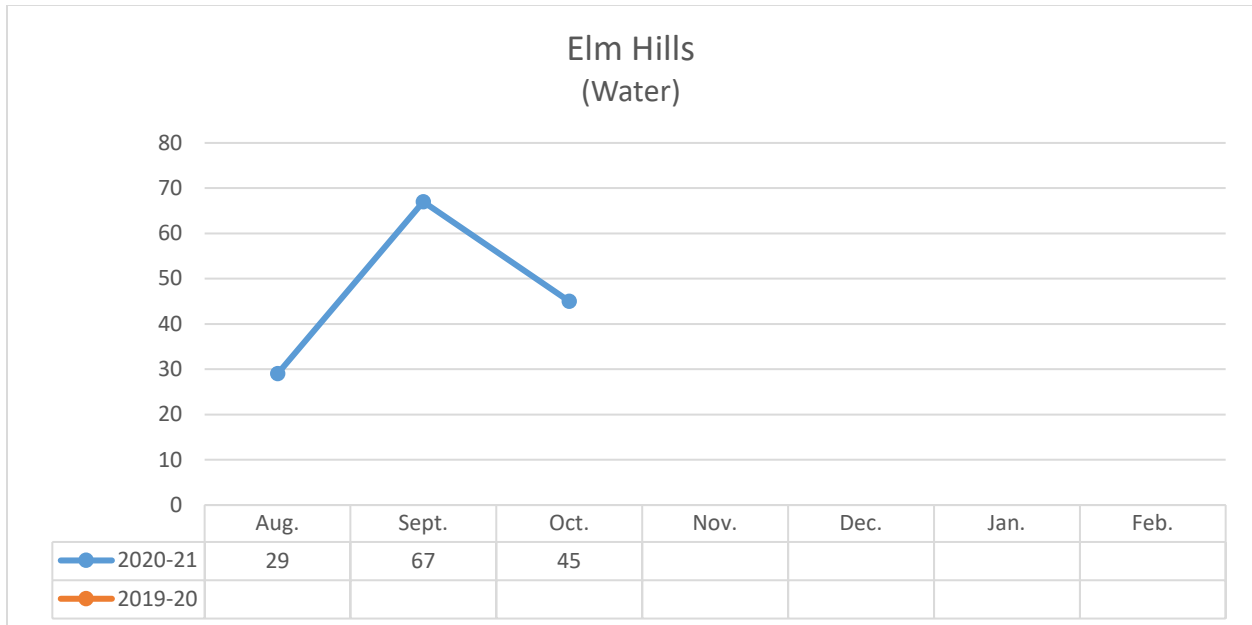
Questions 1 & 3 (Elm Hills - Water)

a) The number of disconnections for non-payment of services as of each month-end



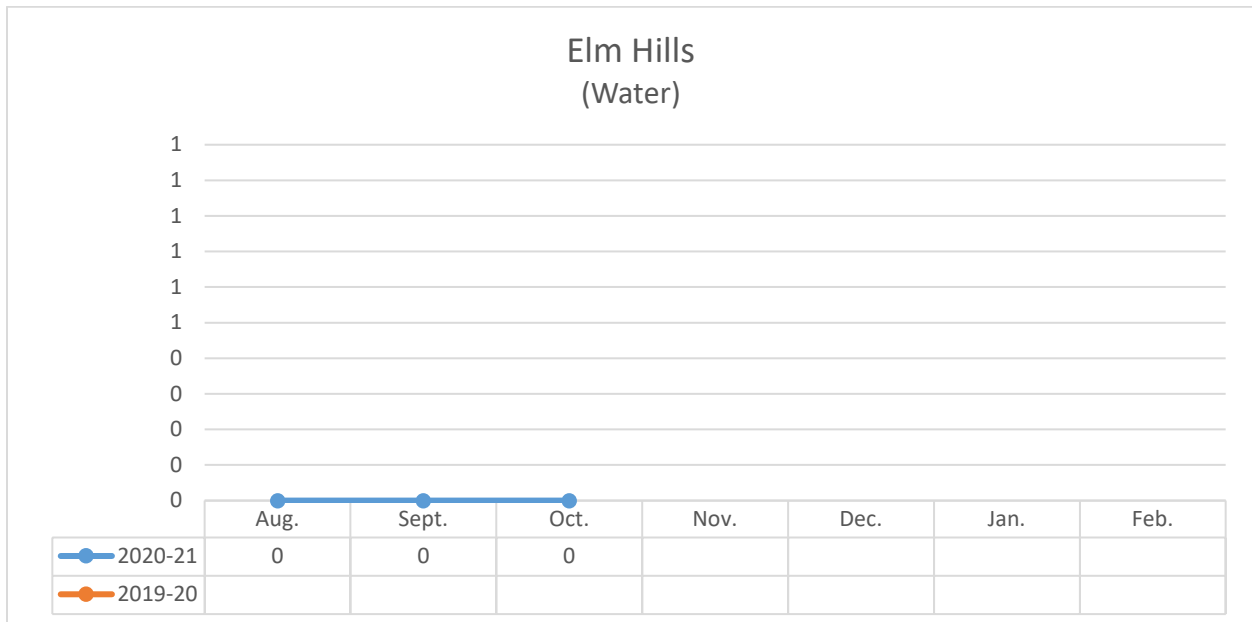
As shown in the previous graph, Elm Hills performed no disconnections in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although no disconnections were performed during this time period.

b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”



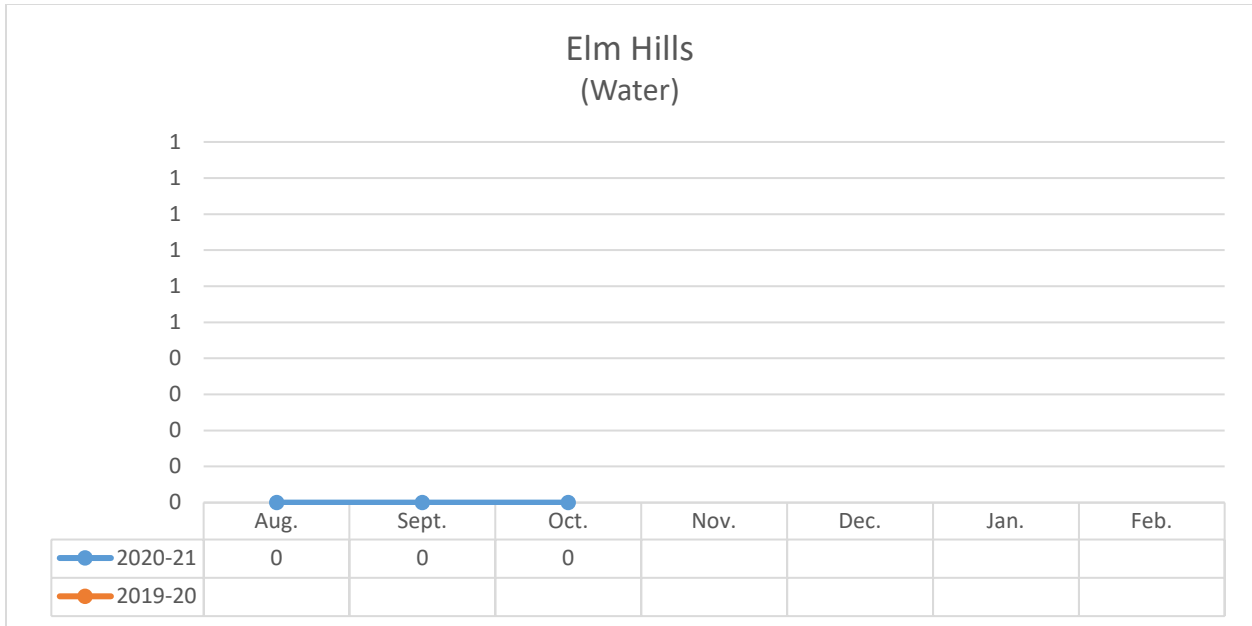
The previous data indicates there were about 33% fewer Elm Hills customers with past-due accounts in October 2020 versus September 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 1 customer with a “past-due” account during this time period. Elm Hills reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid.

c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



As shown by Elm Hills data, no customers received a final disconnection notice in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 1 customer who received a final disconnection notice but was not disconnected during this time period.

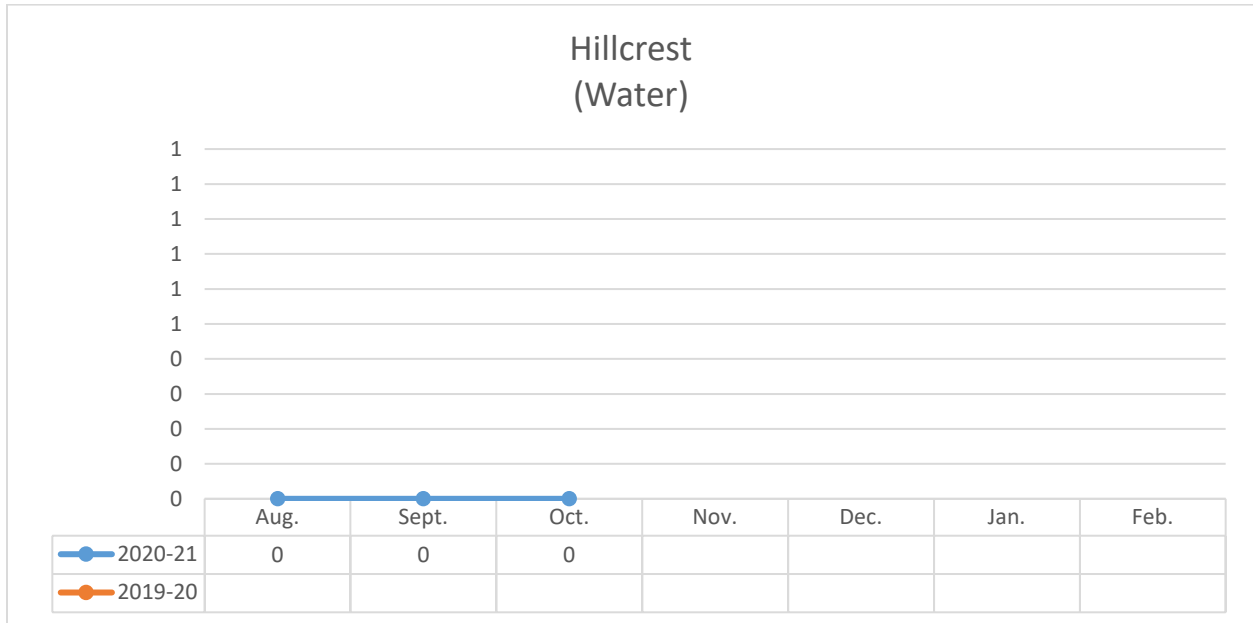
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were no Elm Hills customers who participated in payment plans in October 2020. The Company indicated that it will begin offering payment plans in November 2020. No monthly, comparative data was provided for August 2019 to February 2020, although the Company reported there were no customers who participated in payment plans during this time period.

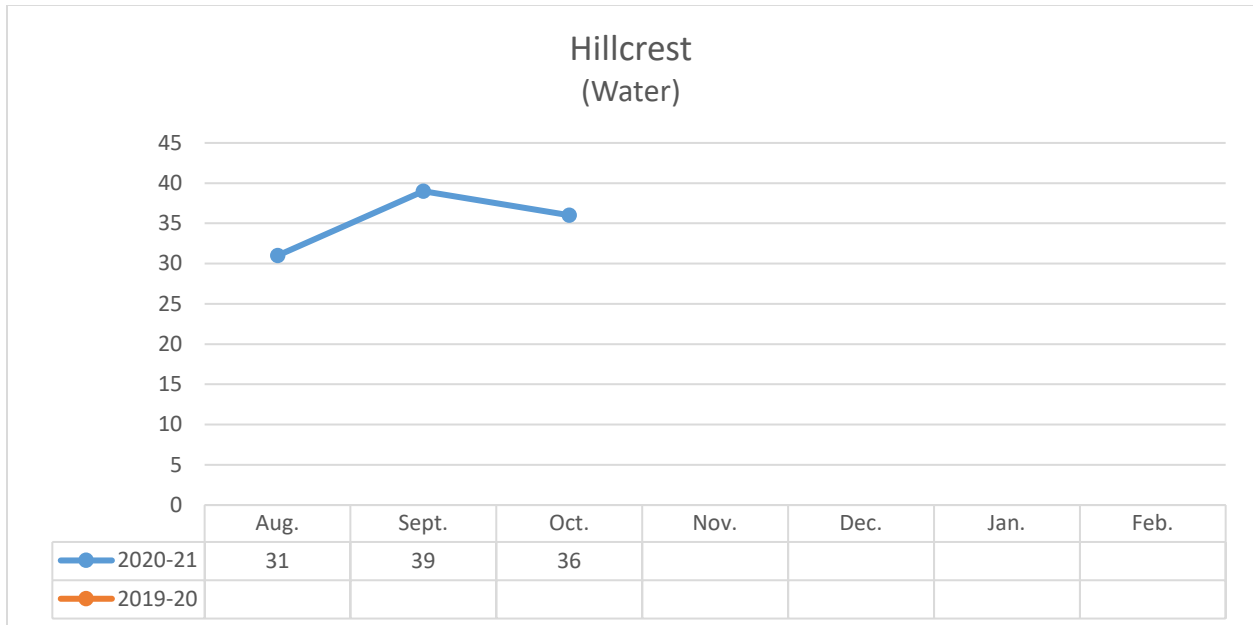
Questions 1 & 3 (Hillcrest - Water)

a) The number of disconnections for non-payment of services as of each month-end



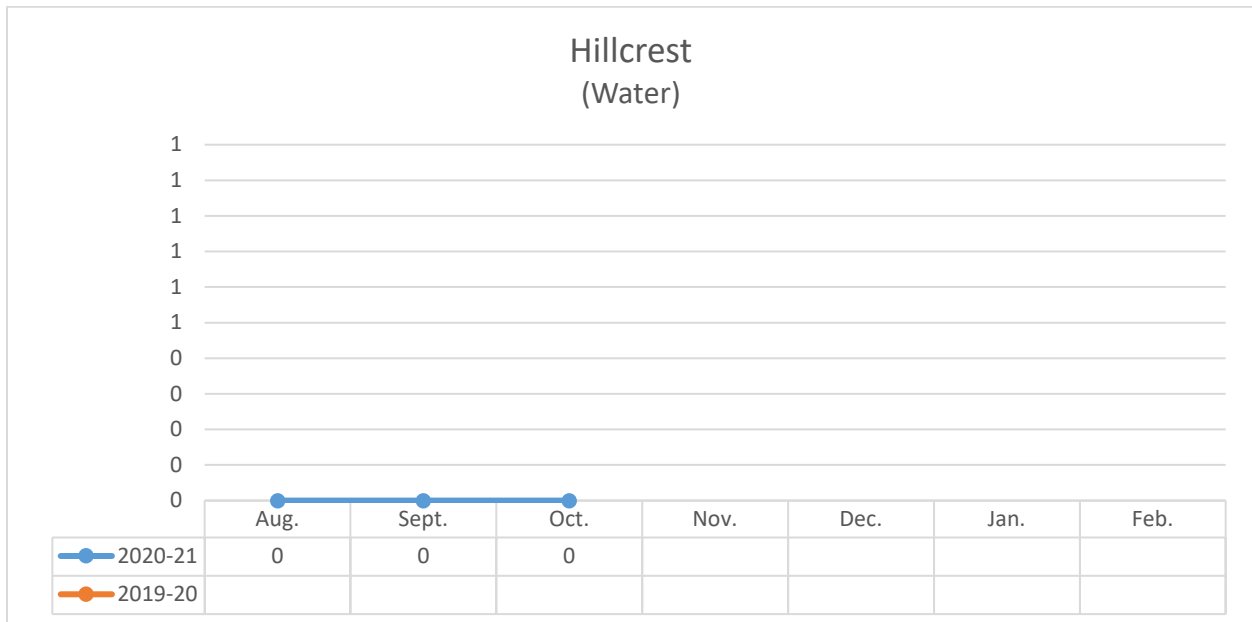
As shown in the previous graph, Hillcrest performed no disconnections in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 12 disconnections was performed during this time period.

b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”



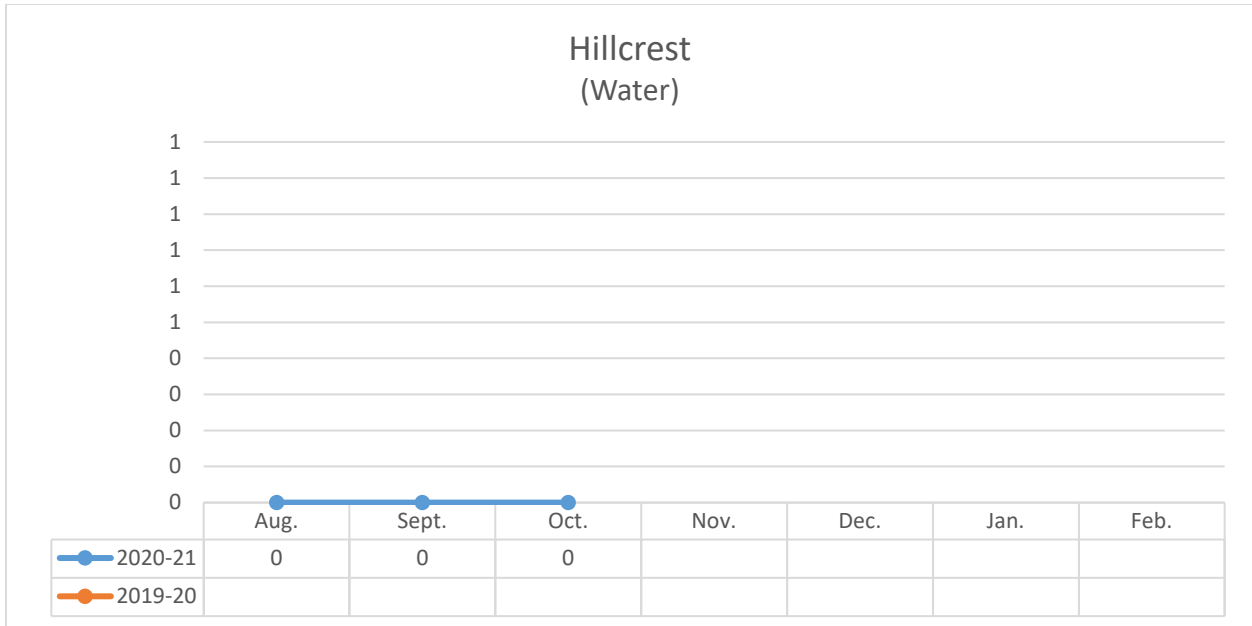
The previous data indicates there were about 8% fewer Hillcrest customers with past-due accounts in October 2020 versus September 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 16 customers with “past-due” accounts during this time period. Hillcrest reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid.

c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



As shown by Hillcrest’s data, no customers received a final disconnection notice in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 4 customers who received final disconnection notices during this time period but were not disconnected.

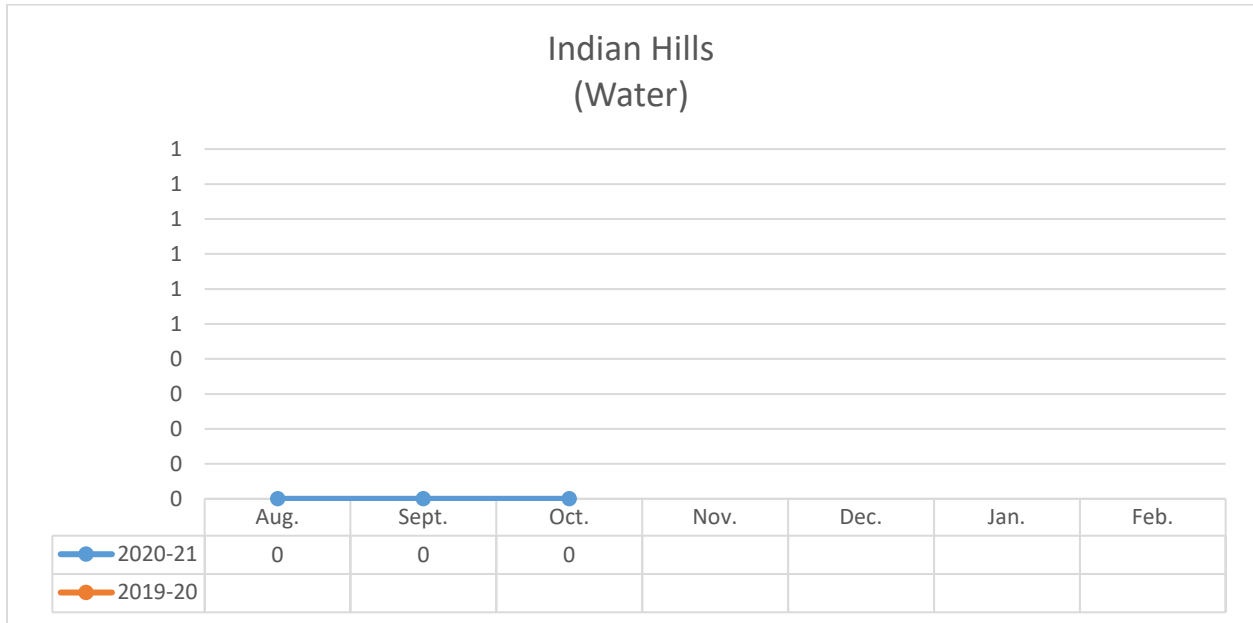
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were no Hillcrest customers who participated in payment plans in October 2020. The Company indicated that it will begin offering payment plans in November 2020. No monthly, comparative data was provided for August 2019 to February 2020, although the Company reported there were no customers who participated in payment plans during this time period.

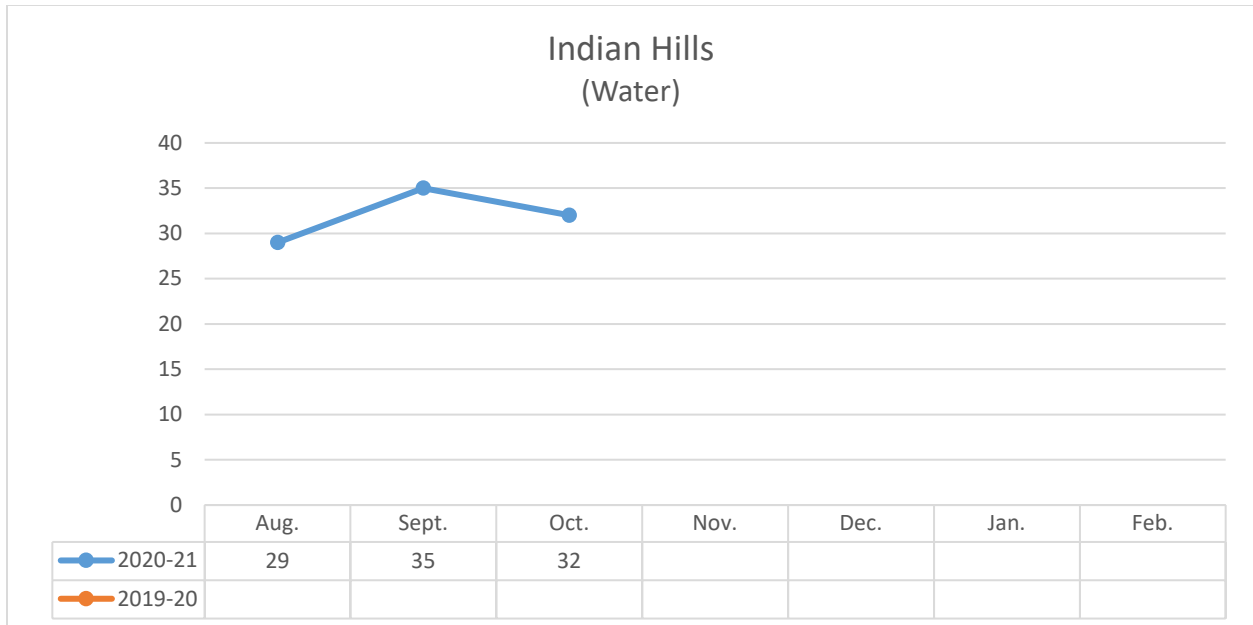
Questions 1 & 3 (Indian Hills - Water)

a) The number of disconnections for non-payment of services as of each month-end



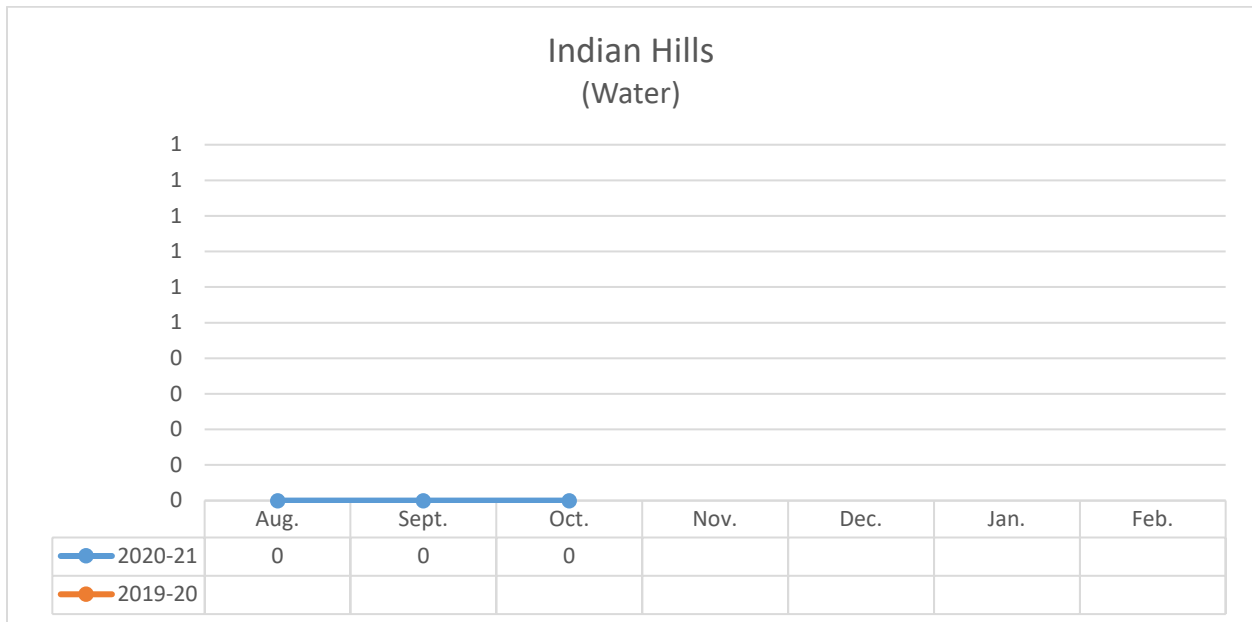
As shown in the previous graph, Indian Hills performed no disconnections in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 6 disconnections was performed during this time period.

b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”



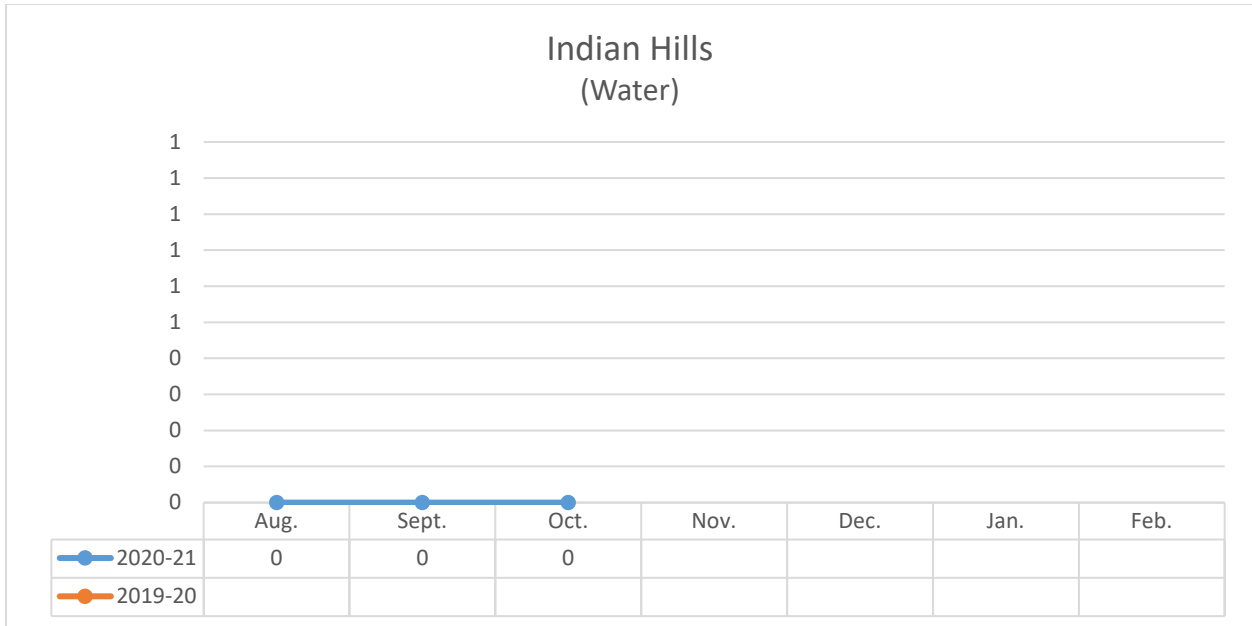
The previous data indicates there were about 9% fewer Indian Hills customers with past-due accounts in October 2020 versus September 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 11 customers with “past-due” accounts during this time period. Indian Hills reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid.

c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



As shown by Indian Hills data, no customers received a final disconnection notice in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 6 customers who received final disconnection notices during this time period but were not disconnected.

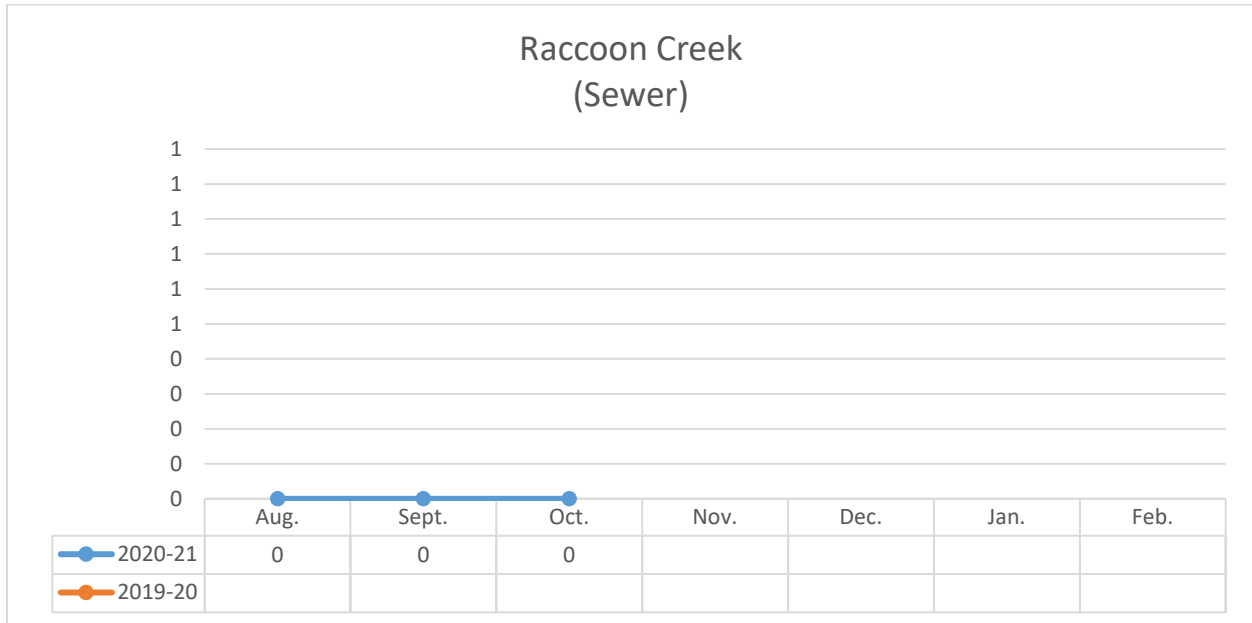
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were no Indian Hills customers who participated in payment plans in October 2020. The Company indicated that it will begin offering payment plans in November 2020. No monthly, comparative data was provided for August 2019 to February 2020, although the Company reported there was a total of 11 customers who participated in payment plans during this time period.

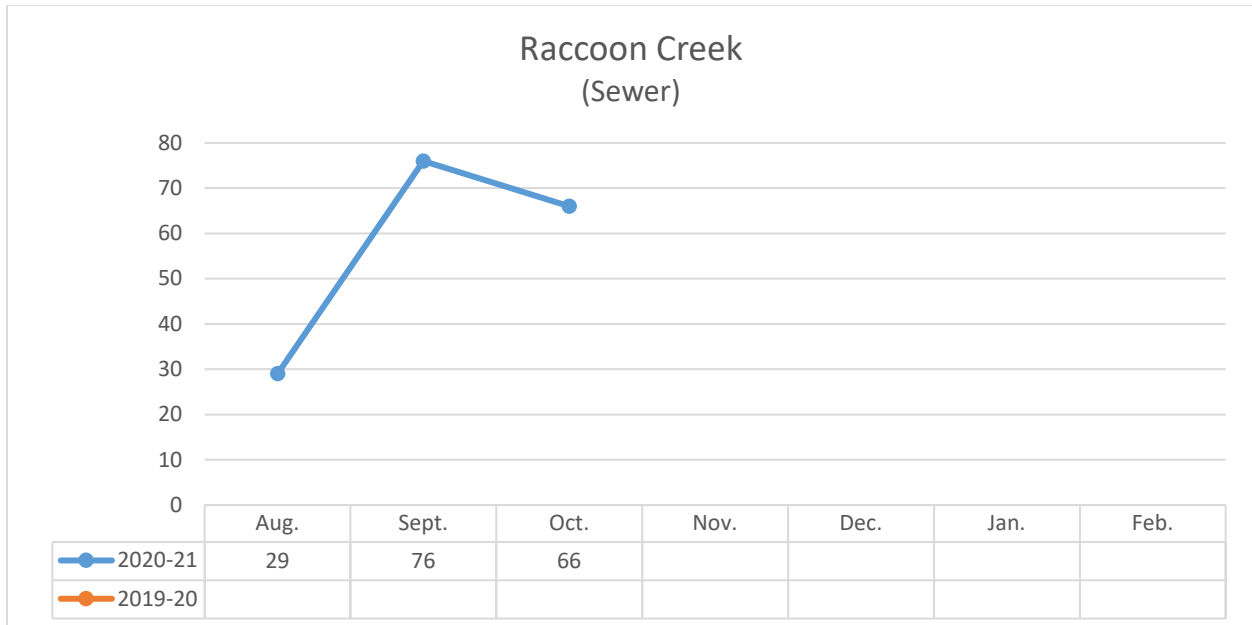
Questions 1 & 3 (Raccoon Creek - Sewer)

a) The number of disconnections for non-payment of services as of each month-end



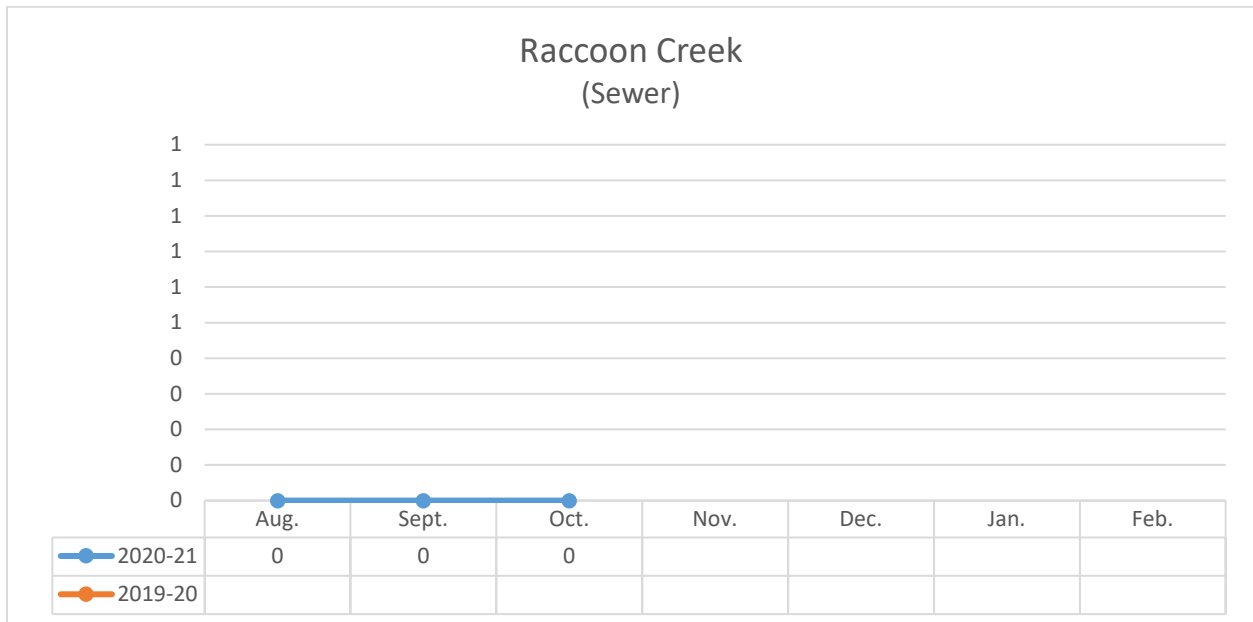
As shown in the previous graph, Raccoon Creek performed no disconnections in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although a total of one (1) disconnection was performed during this time period.

b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”



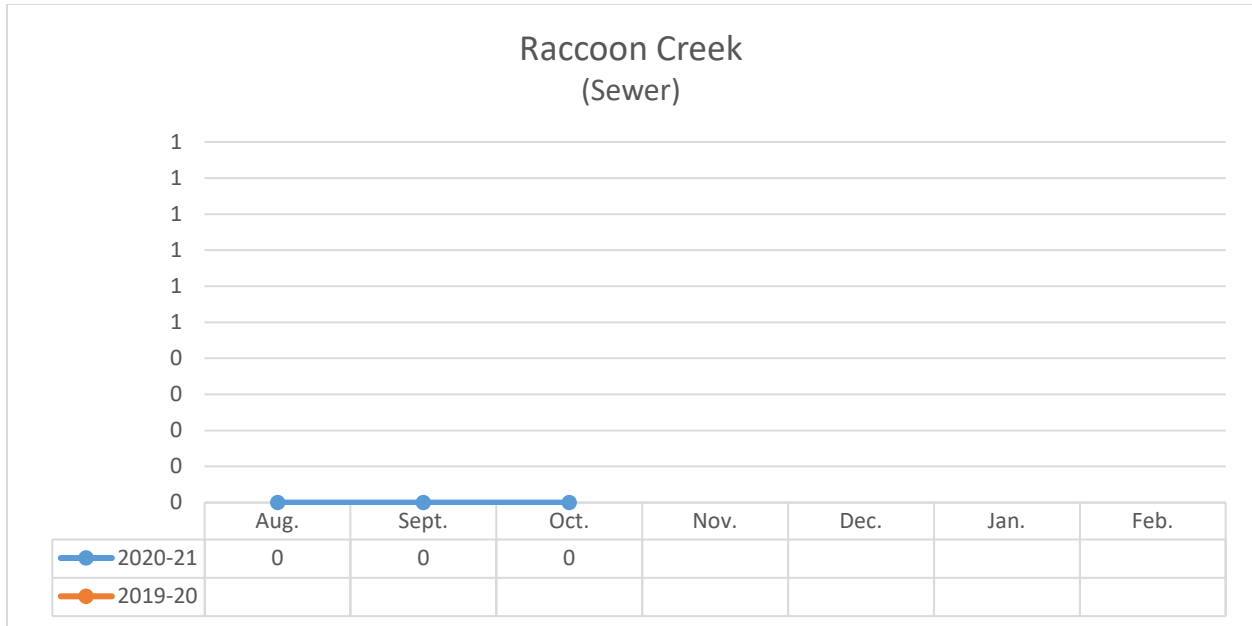
The previous data indicates there were about 13% fewer Raccoon Creek customers with past-due accounts in October 2020 versus September 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 3 customers with “past-due” accounts during this time period. Raccoon Creek reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid.

c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



As shown by Raccoon Creek data, no customers received a final disconnection notice in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 2 customers who received final disconnection notices during this time period but were not disconnected.

d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were no Raccoon Creek customers who participated in payment plans in October 2020. The Company indicated that it will begin offering payment plans in November 2020. No monthly, comparative data was provided for August 2019 to February 2020, although the Company reported there were no customers who participated in payment plans during this time period.

Question 2

Please provide your company’s estimate of the number of disconnections for non-payment of service for the six-month period of September 2020 through February 2021, with an explanation of the methodology and assumptions used to develop these projections.

Ameren Missouri (Electric)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
9,000	9,000	7,000	5,000	5,000	7,190

Ameren Missouri responded with an estimated total of 42,190 disconnections for non-payment of service for the six-month period of September 2020 through February 2021. Ameren Missouri stated that the total number was based on a 35% increase from last year because, since resuming disconnects in August 2020, the disconnect orders have increased 35% over August 2019.

Empire (Electric)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
1,600	1,600	50	50	50	50

Empire responded that several factors prevent it from working disconnects in the winter season (November-February). These factors include: temperatures and several holidays in November and December. Also, during this time period many customers participate in the cold weather agreement to avoid being disconnected for non-pay. Empire looked at the historical averages, and stated the current disconnects in August were higher than the previous years due to COVID. It was unable to disconnect for non-payment during the moratorium from March to July. It has also enlisted the help of its service centers, which will enable Empire to work more disconnects, weather permitting. With the help of its service department, Empire is projecting a maximum of 1,600 disconnects per month for September and October.

Evergy Metro (Electric)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
3,300	3,300	660	100	100	100

Evergy Metro responded that its estimates are based on recent and previous year data and resource capacity. In November, it assumed a reduced number of days that it will be eligible to do shut-offs due to weather. For December – February it assumes commercial shut-offs only due to likely Cold Weather Rule restrictions.

Evergy West (Electric)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
2,200	2,200	440	60	60	60

Evergy West responded that its estimates are based on recent and previous year data and resource capacity. In November, it assumed a reduced number of days that it will be eligible to do shut-offs due to weather. For December – February it assumes commercial shut-offs only due to likely Cold Weather Rule restrictions.

Ameren Missouri (Gas)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
230	176	15	35	55	2

Ameren Missouri responded with an estimated total of 530 disconnections for non-payment of service for the six-month period of September 2020 through February 2021. Ameren Missouri stated that the total number was based on a 35% increase from last year because, since resuming disconnects in August 2020, the disconnect orders have increased 35% over August 2019.

Spire (Gas)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
5,673	5,379	1,091	963	862	2,249

Spire responded that its estimate includes a 3-year average each month and Sept/Oct with 30% added due to expected volume.

Summit (Gas)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
201	64	13	7	40	53

Summit did not provide an explanation of the methodology and assumptions used to develop these projections.

Empire (Gas)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
1,140	1,140	1,140	50	50	50

Empire responded that normally in November through December it is not able to disconnect very many customers because the Credit reps are on the phones helping to keep up the service level. Also, the temperatures aren't usually the most favorable during that time period. Empire is normally able to start disconnects again the beginning of the year, weather permitting. It believes

Staff Report

that the bills are going to be quite a bit higher due to the pandemic. It is projecting a maximum of 1,140 disconnects per month for September and October, with the probability of disconnects being very minimal in November-February due to taking calls and weather.

Liberty (MNG - Gas)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
1,200	1,200	1,200	25	25	120

Liberty responded that its estimates are based on August 2020 disconnections for September and October. It used historical averages of the past three years for the winter months of November thru February. It also said that weather constraints will play a major part in disconnects especially in its Northern areas.

Liberty (Water)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
60	60	40	40	40	40

Liberty responded that several factors prevent it from working disconnects in the winter season (November-February). These factors include: temperatures and several holidays in November and December. Liberty also looked at the historical averages and found that the current disconnects in August were higher than the previous years due to COVID. Liberty was unable to disconnect for non-payment during the moratorium from March to July.

Missouri American (Water)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
Do not forecast	-	-	-	-	-

Missouri American responded that it does not forecast disconnections for non-payment.

Raytown Water (Water)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
105	208	71	88	85	72

Raytown Water responded that its estimated numbers are based on an average of 2018-2019 data for the same month.

Confluence Rivers (Water)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
0	Unknown at this time	-	-	-	-

Confluence Rivers responded that it does not have an estimated amount of disconnections for the time period specified. It plans to resume disconnection processes in October.

Elm Hills (Water)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
0	Unknown at this time	-	-	-	-

Elm Hills responded that it does not have an estimated amount of disconnections for the time period specified. It plans to resume disconnection processes in October.

Hillcrest (Water)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
0	Unknown at this time	-	-	-	-

Hillcrest responded that it does not have an estimated amount of disconnections for the time period specified. It plans to resume disconnection processes in October.

Indian Hills (Water)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
0	Unknown at this time	-	-	-	-

Indian Hills responded that it does not have an estimated amount of disconnections for the time period specified. It plans to resume disconnection processes in October.

Raccoon Creek (Sewer)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
0	Unknown at this time	-	-	-	-

Raccoon Creek responded that it does not have an estimated amount of disconnections for the time period specified. It plans to resume disconnection processes in October.