

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

In the Matter of Evergy Metro, Inc. d/b/a Evergy)
Missouri Metro’s Request for Authority to) File No: ER-2022-0129
Implement a General Rate Increase for Electric)
Service)

In the Matter of Evergy Missouri West, Inc.)
d/b/a Evergy Missouri West’s Request for) File No: ER-2022-0130
Authority to Implement a General Rate Increase)
for Electric Service)

PUBLIC COUNSEL DATA REQUESTS NOS. 5067-5069

The Office of Public Counsel (Public Counsel) hereby presents the following Data Requests Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West. Please provide electronic responses to the following: opcservice@opc.mo.gov, lisakremer@mchsi.com, and john.clizer@opc.mo.gov. Public Counsel asks that Evergy Metro, Inc. and Evergy Missouri West, Inc. respond to each of these requests within 10 calendar days. The data requests are continuing in nature and require supplemental responses as soon as further or different information is obtained that is responsive to them.

DEFINITIONS

As used herein, the words “document” or “documents” include any original and all copies of any written, printed, typed, electronically stored, or graphic matter of any kind or nature, however produced or reproduced, now in your possession, custody or control, or in the possession, custody or control of your agents, representatives, employees of you or any and all persons acting in your behalf, including documents at any time in the possession, custody or control of such individuals or entities, or known by you to exist.

DATA REQUESTS

5067. With reference to Mr. Caisley's Rebuttal Testimony, page 3 lines 8 through 10, please provide a list of all of the regulated utilities, state Commissions, trade associations the Company consulted and all other research that the Company conducted that supported or did not support Mr. Caisley's statement that OPC's request for CIS simulated access was a "highly unusual request" and that the Company "is not aware of anywhere in the U.S. where a regulatory stakeholder has requested and been granted access to a utility's customer-facing portals."

5068. With reference to Mr. Caisley's Rebuttal Testimony, page 3 lines 11 and 12 indicating OPC's request for CIS access would "pose significant cost" to the Company, please provide a cost estimate for OPC's request including a breakdown by cost category for the estimate.

5069. With reference to Mr. Caisley's Rebuttal Testimony, page 24 lines 4 through 5, please provide the results of all research the Company has conducted to support its statements that "most regulated utilities" have had the goal over the last 15 years to "improve and increase the use of automation and customer self-service channels." Please indicate how such goals help meet customer expectations as identified in Mr. Caisley's rebuttal testimony and which specific customer segmentations have such expectations, such as low-income, elderly, middle to upper income, etc.

Submitted July 18, 2022, by Lisa Kremer



Legal Department

Roger W. Steiner
Corporate Counsel
Telephone: (816) 556-2314
Facsimile: (816) 556-2110
Roger.Steiner@evergy.com

July 22, 2022

VIA EMAIL: John.Clizer@opc.mo.gov

John Clizer
200 Madison Street, Suite 650
Jefferson City, MO 65102

RE: File Nos. ER-2022-0129/0130; The Office of the Public Counsel (“OPC”) Data Requests

Dear John:

This letter is in response to the following Data Requests:

- (i) Data Requests nos. 3040 through 3041 and 5067 through 5069 in File Nos. ER-2022-0129/0130 which Evergy Metro, Inc. d/b/a as Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”)(collectively, the “Company”) received from OPC.

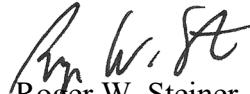
This letter should be considered an objection on behalf of the Company to the Data Requests described above (collectively, the “Data Requests”) in accordance with Commission Rule 20 CSR 4240-2.090(2), for the reasons described below.

The Company objects to the Data Requests to the extent they seek documents or information protected by the attorney client privilege, the attorney work product doctrine, or any other applicable privileges or doctrines. Any inadvertent disclosure of such privileged documents or information shall not be deemed to be a waiver by the Company of the attorney-client privilege, work product doctrine, or other applicable privileges or doctrines.

Additionally, the Company objects to the Data Requests as overly broad, unduly burdensome, calling for speculation and not reasonably calculated to lead to the discovery of admissible evidence and not relevant or material to the subject matter of this proceeding. Moreover, several Data Requests call for the repeat of statements that are already contained in pre-filed testimony and to the extent already provided, the Company will not repeat its testimony in its response.

The Company will provide responses to these Data Requests subject to the objections asserted above.

Sincerely,



Roger W. Steiner

Evergy Missouri Metro
Case Name: 2022 Evergy MO Metro Rate Case
Case Number: ER-2022-0129

Requestor Kremer Lisa -
Response Provided August 01, 2022

Question:5067

With reference to Mr. Caisley's Rebuttal Testimony, page 3 lines lines 8 through 10, please provide a list of all of the regulated utilities, state Commissions, trade associations the Company consulted and all other research that the Company conducted that supported or did not support Mr. Caisley's statement that OPC's request for CIS simulated access was a "highly unusual request" and that the Company "is not aware of anywhere in the U.S. where a regulatory stakeholder has requested and been granted access to a utility's customer-facing portals."

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

The Company objects to this data request as unduly burdensome and not reasonably calculated to lead to the production of relevant information. Moreover, this data request is not necessary to evaluate whether the systems are used and useful and serving customers. The functionality described by the Company in its testimony is able to be benchmarked against functionality provided to customers by other utilities to determine prudence and the effectiveness of meeting customer service thresholds.

Mr. Caisley serves has served as the co-chairperson of the EEI Executive Advisory Committee (EAC) on Customer Service for more than six years. He has been a member of that EAC for more than a decade. In that time, members of the committee have extensively discussed customer information system implementations, customer facing authenticated portals and nearly every aspect of digital customer service. In none of those discussions has a utility member ever discussed giving simulated access to their systems to a non-customer or outside party.

In addition, Mr. Caisley has been a member of the Marketing Executive Conference (MEC) for more than a decade. This is the oldest active investor-owned utility organization dedicated to customer service, customer experience and customer issues generally in the United States. It is comprised of current and former chief customer officers of most of the investor-owned utilities in the U.S. It also has members from large municipal utilities like Los Angeles, SMUD, Salt

River Project, Orlando and others. Mr. Caisley has served as the president of that organization in the past as well as the chairperson of the curriculum and education committees. During the last ten years, the issues of customer-facing software systems, digitalization and automation, and customer information system implementations have been annual topics of conversation and discussion. In addition, these groups and others have discussed in detail the regulatory processes, testimony and success and failures regarding cost recovery and prudence of these systems and their attributes. In that time period, not one utility has ever disclosed nor has Evergy found in public records reviewed in those cases, an instance where a party to a regulatory proceeding requested and received a simulated customer account log-in.

If OPC's consultant, Ms. Kremer, in her knowledge and experience is aware of any investor-owned utility in the U.S. that has granted access to a simulated customer log-in, and is willing to share the company and case number, Evergy would be willing to contact that company and explore further the feasibility of this unusual request.

Information provided by: Julie Dragoo, Sr. Director Customer Strategy & Support

Attachment(s):

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs

Evergy Missouri Metro
Case Name: 2022 Evergy MO Metro Rate Case
Case Number: ER-2022-0129

Requestor Kremer Lisa -
Response Provided July 27, 2022

Question:5068

With reference to Mr. Caisley's Rebuttal Testimony, page 3 lines 11 and 12 indicating OPC's request for CIS access would "pose significant cost" to the Company, please provide a cost estimate for OPC's request including a breakdown by cost category for the estimate

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

The Company objects to this data request as unduly burdensome and not reasonably calculated to lead to the production of relevant information. Moreover, this data request is not necessary to evaluate whether the systems used are useful and serving customers. The functionality described by the Company in its testimony is able to be benchmarked against functionality provided to customers by other utilities to determine prudence and the effectiveness of meeting customer service thresholds.

Further, the rapid adoption and, in some areas, industry leading customer penetration of these systems is evidence of their effectiveness at serving customers. Nowhere in its testimony has OPC offered specific deficiencies or disallowances that would justify the creation of a simulated customer account and log-in or in the creation of the detailed cost estimate requested in this DR. The testimony speaks for itself, and witness Caisley is available for cross-examination on this section of his testimony.

The effort to create a detailed cost estimate is not a reasonable request. To provide a complete cost breakdown of setting up the access that OPC has requested, Evergy would have to create an IT project plan and completely scope the project. This would require planning and providing cost estimates for including, but is not limited to:

- internal and external IT time to work on the project;
- programming costs for reconfiguration of multiple software systems to accommodate a simulated customer account and log-in;
- segregated data pools and integration with multiple software systems;

- development of test cases, with full SIT and UAT testing;
- identifying business areas which would have to be involved both with the integration, testing and fictitious data creation;
- internal and external security design, testing and implementation; and
- determining ongoing overall integration and operation costs.

Just the creation of the cost breakdown that OPC is requesting, would require a detailed project plan that would exceed \$10,000 in internal and external business resources. To actually design, create, integrate, test and secure simulated customer accounts would easily exceed \$100,000 in internal and external labor, programming and other costs.

Finally, there are “costs” that are not hard dollar in nature such as the risk it creates to our production customer billing and accounting systems. As mentioned in previous DR responses and testimony, to recreate all the scenarios contemplated by OPC could be hundreds of accounts and generating fake customer info is not a feasible way to manage the ask.

Information provided by: Julie Dragoo, Sr. Director Customer Strategy and Support and Chuck Caisley, Chief Customer Officer.

Attachment(s):

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs

Evergy Missouri Metro
Case Name: 2022 Evergy MO Metro Rate Case
Case Number: ER-2022-0129

Requestor Kremer Lisa -
Response Provided July 27, 2022

Question:5069

With reference to Mr. Caisley's Rebuttal Testimony, page 24 lines 4 through 5, please provide the results of all research the Company has conducted to support its statements that "most regulated utilities" have had the goal over the last 15 years to "improve and increase the use of automation and customer self-service channels." Please indicate how such goals help meet customer expectations as identified in Mr. Caisley's rebuttal testimony and which specific customer segmentations have such expectations, such as low-income, elderly, middle to upper income, etc.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

There was no need to conduct research to know this about other utilities. Many of our customer service leaders sit on committees with groups such as EEI, AEIC, CS Week, etc. where the topics of discussion include best practices for increased automation and improved self-service for our customers. These goals help drive improved customer satisfaction and reduce the cost to serve our customers. As for meeting customer expectations, all customers regardless of demographics have a desire for their utility to meet their expectations. It is Evergy's responsibility to respond to customers and support them through the channels they desire whether that is via our contact center, IVA, website, or even in person at our Connect center.

Information provided by: Julie Dragoo, Sr. Director Customer Strategy & Support

Attachment(s):

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*

Director Regulatory Affairs