

**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

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

1. On August 19, 2020, the Commission issued its *Order Directing Staff to Gather Information about Utility Disconnections*. Staff was directed 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.

2. 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. In its *Order Extending Direction to Staff to Gather Information About Utility Disconnections* (“Order”), issued on December 2, 2020, the Commission ordered the state utilities to file updated responses to Staff’s DRs by the 15th of every month.

3. The majority of the state’s utilities provided updated responses to Staff’s DRs. However, the Central States Water Resources (“CSWR”) entities could only provide data pertaining to Staff’s first request, regarding current levels of disconnection for non-payment. Those entities are:

- a. Confluence Rivers Utility Operating Company, Inc.;
- b. Elm Hills Utility Operating Company, Inc.;

- c. Hillcrest Utility Operating Company, Inc.;
- d. Indian Hills Utility Operating Company, Inc.; and
- e. Raccoon Creek Utility Operating Company, Inc.

4. CSWR explained to Staff on January 6 that, due to employee turnover, there was no longer anyone trained to compile the more detailed information requested in this docket.

5. However, CSWR can continue to supply the total number of disconnections. For both November and December, CSWR reported no disconnections.

6. CSWR is unsure at this time when it can resume providing all of the data requested by Staff in this docket.

WHEREFORE, Staff respectfully submits its report for the Commission's knowledge and consideration.

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 on this 22nd day of January, 2021.

/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

JANUARY 22, 2021

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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 fourth such update, incorporating information through the end of December 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 December 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"), and The Raytown Water Company ("Raytown Water").

The following utilities did not respond to the Staff data request with month-end December 2020 data in time to incorporate the information into this report: 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"). All of the above listed utilities are part of the Central States Water Resources ("CSWR") family of water and sewer utilities. Information for the CSWR utilities will be provided through month-end October 2020 in this report, although the CSWR utilities stated there were no disconnections for non-payment in November and December 2020. The CSWR utilities did not indicate when they will resume submitting monthly report updates.

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 December 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 December 2020 compared to November 2020).

Summary of Responses to Questions 1 and 3

Regarding Question 1a and 3a, individual utilities reported both increases and decreases in the number of customer disconnections in December 2020 compared to the amount from December 2019. However, almost all of the utilities reported decreases in the number of disconnections for December 2020 compared to the previous month, November 2020, with many of the decreases being sizeable.

For Question 1b and 3b, most utilities reported increases in the number of past-due customer accounts in December 2020 compared to the amount from December 2019. Most utilities also reported increases in the number of past-due accounts in December 2020 compared to the previous month.

For Question 1c and 3c, in December 2020, approximately half of the utilities reported increases in the number of customers who have received final disconnection notices, but have not

yet been disconnected, and half reported decreases in this metric, compared to December 2020. There was no clear trend upward or downward for this metric for December 2020 compared to the previous month.

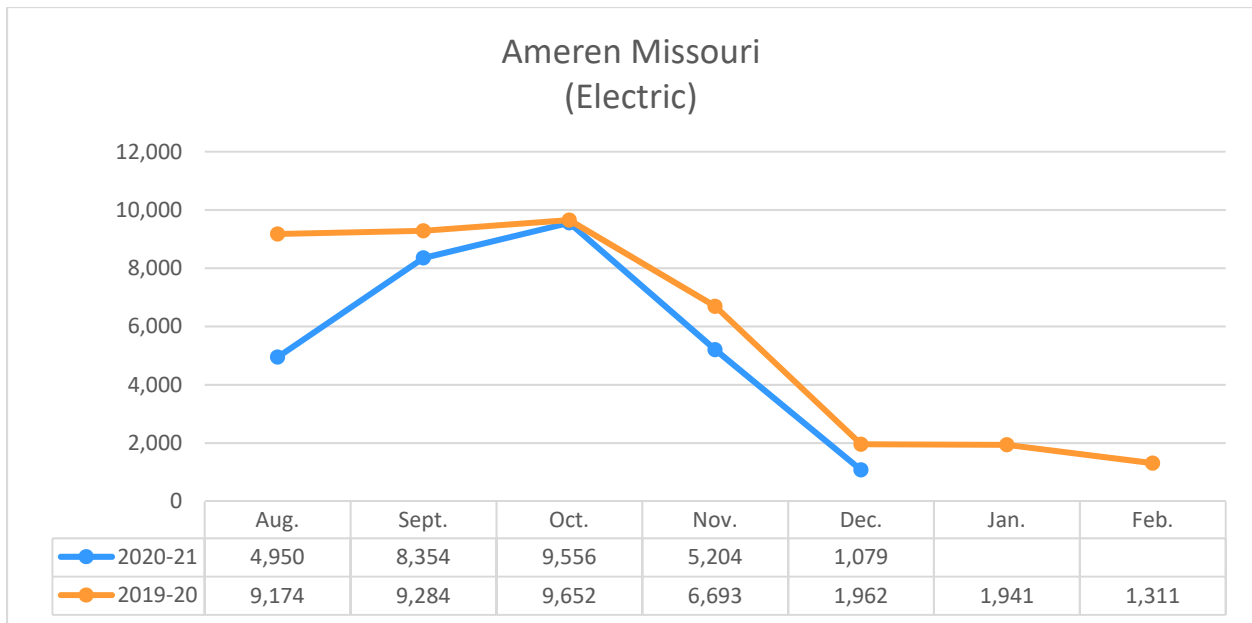
Regarding Question 1d and 3d, almost all utilities reported increases in the number of customers participating in payment plans in December 2020 compared to December 2019. However, there was no clear trend upward or downward apparent across all utilities in the number of customers participating in payment plans in December 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)

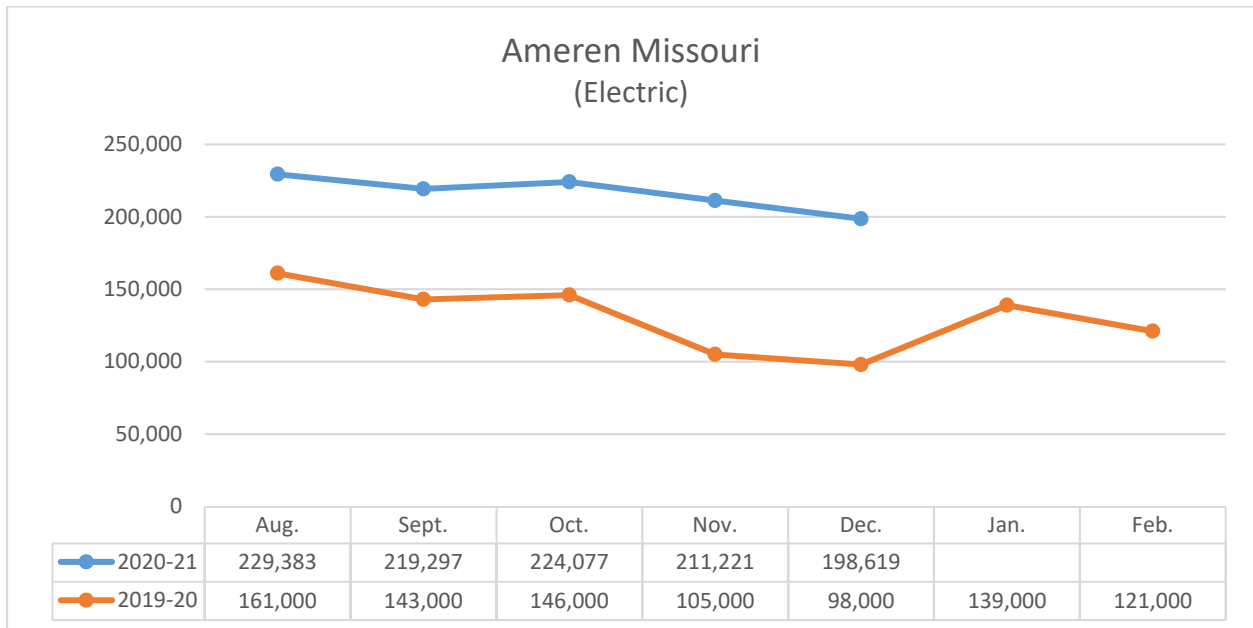
a) The number of disconnections for non-payment of services as of each month-end



As shown in the previous graph, Ameren Missouri performed approximately 45% fewer disconnections for non-payment in December 2020 versus December 2019 and about 79% fewer

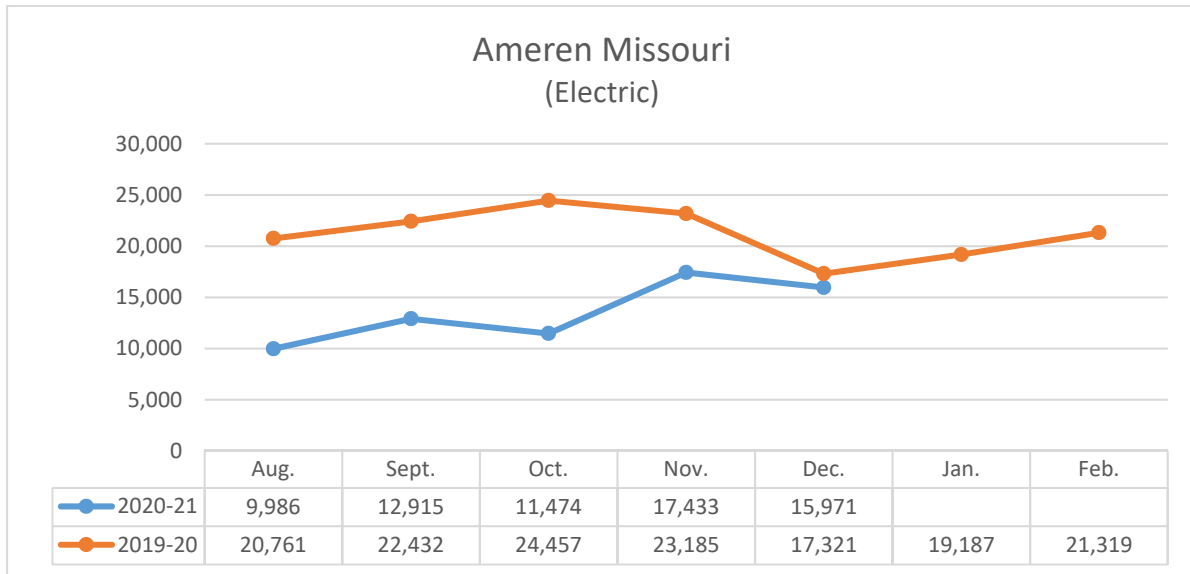
in December 2020 than in November 2020. The number of actual disconnections by Ameren Missouri in December 2020 was approximately 78% below the number projected by Ameren Missouri for the same month.

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”



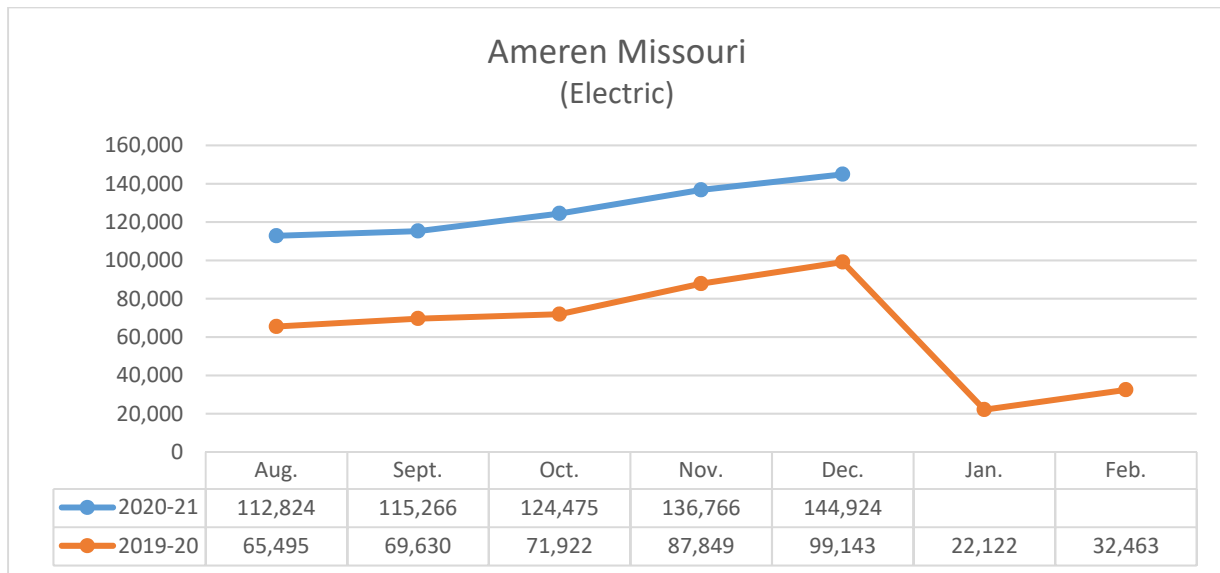
The previous data indicates that there were about 103% more Ameren Missouri customers with past-due accounts in December 2020 versus December 2019 and approximately 6% fewer in December 2020 than in November 2020. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

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 8% fewer customers who were not disconnected in December 2020 versus December 2019 and approximately 8% less in December 2020 than in November 2020.

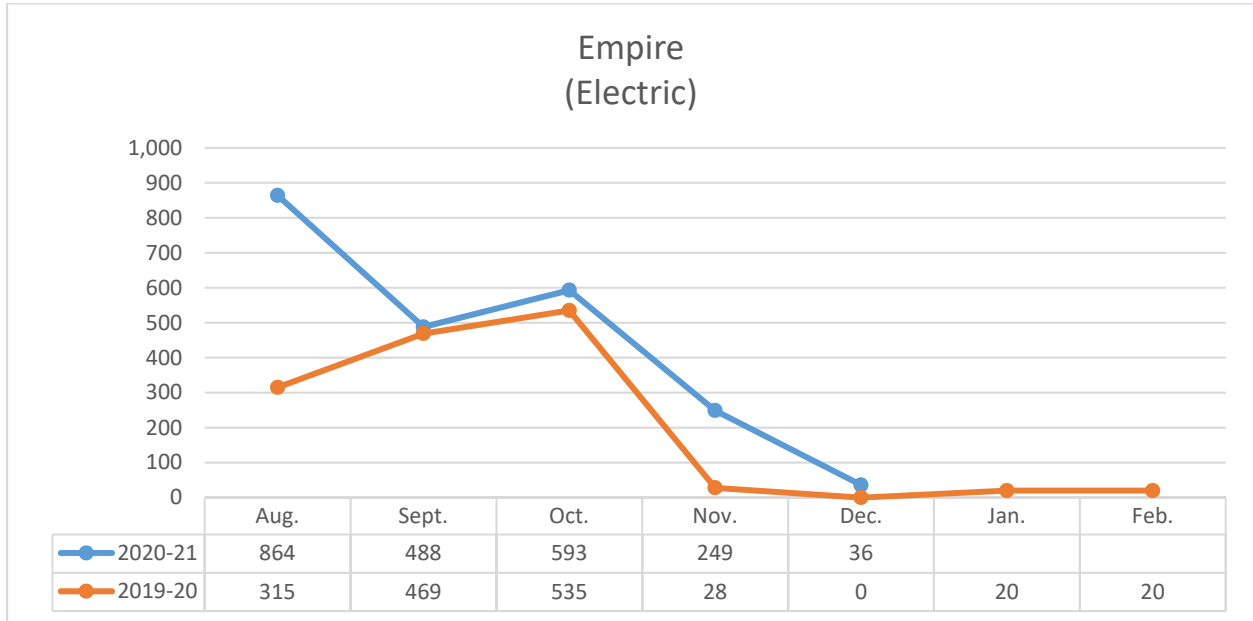
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 46% more Ameren Missouri customers who participated in payment plans in December 2020 versus December 2019 and about 6% more in December 2020 than in November 2020.

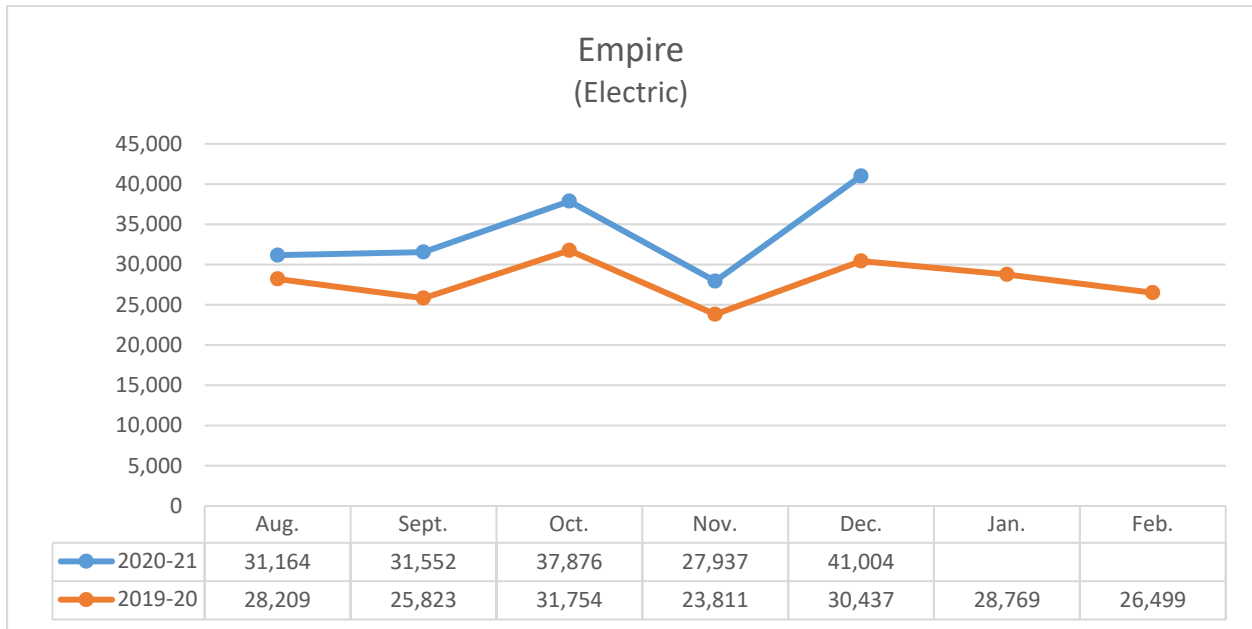
Questions 1 & 3 (Empire – Electric)

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



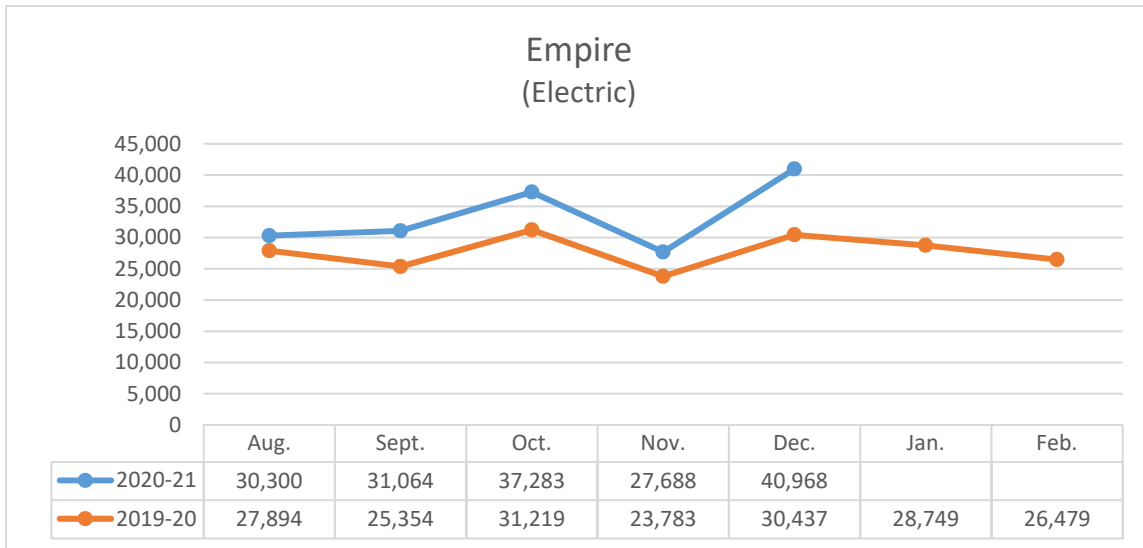
As shown in the previous graph, Empire performed 36 disconnections for non-payment in December 2020 versus 0 in December 2019 and about 86% fewer in December 2020 than in November 2020. The number of actual disconnections by Empire in December 2020 was approximately 28% below the number projected by Empire for the same month.

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”



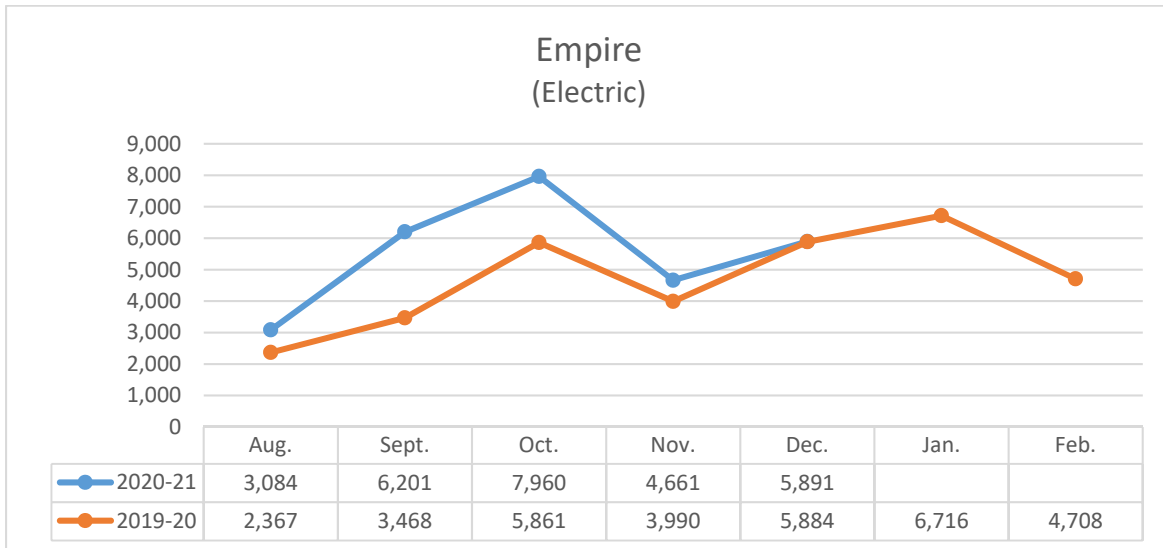
The previous data indicates that there were about 35% more Empire customers with past-due accounts in December 2020 versus December 2019 and approximately 47% more in December 2020 than in November 2020. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the 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 35% more customers who were not disconnected in December 2020 versus December 2019 and approximately 48% more in December 2020 than in November 2020.

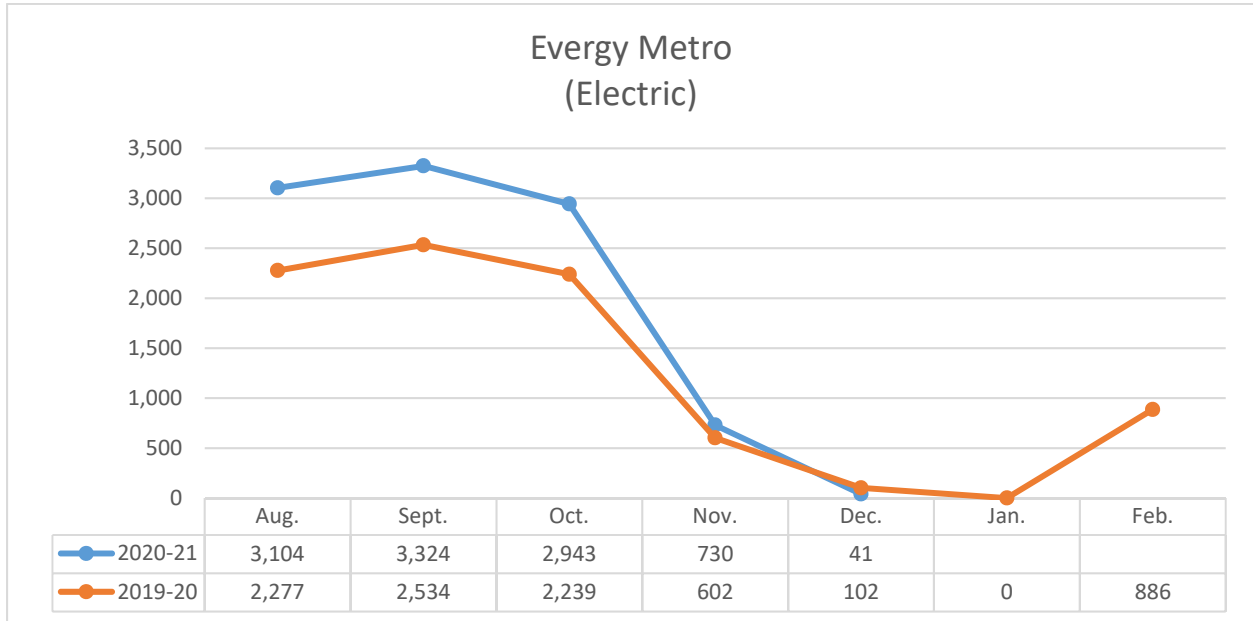
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately .12% more Empire customers who participated in payment plans in December 2020 versus December 2019 and about 26% more in December 2020 than in November 2020.

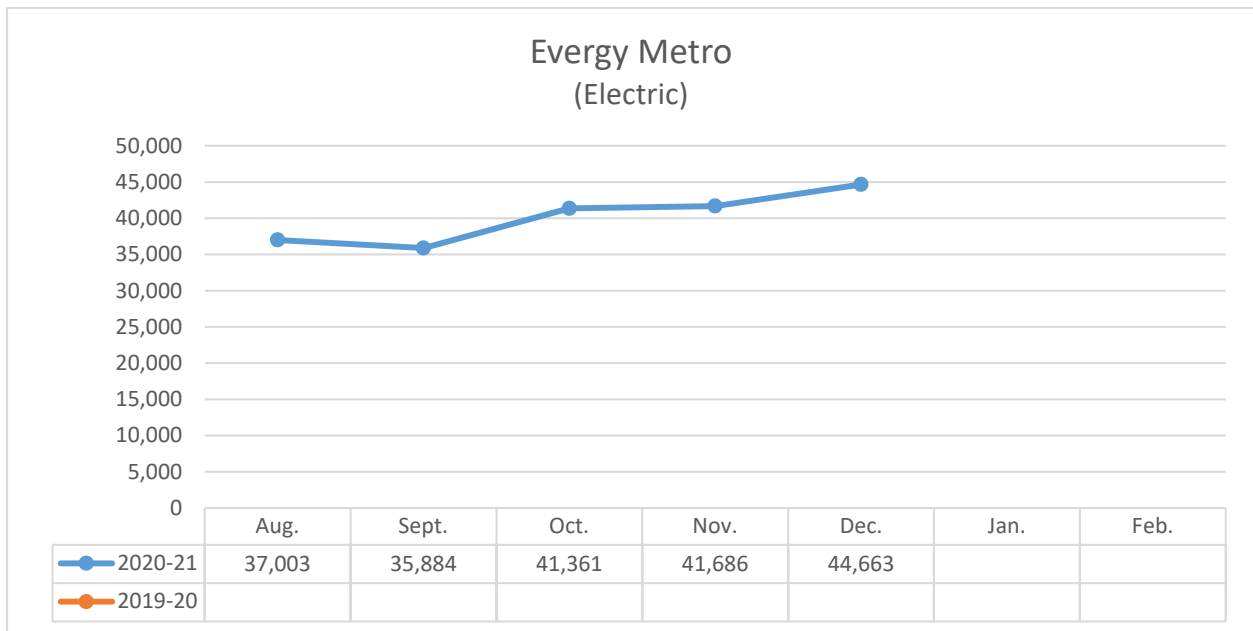
Questions 1 & 3 (Evergy Metro – Electric)

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



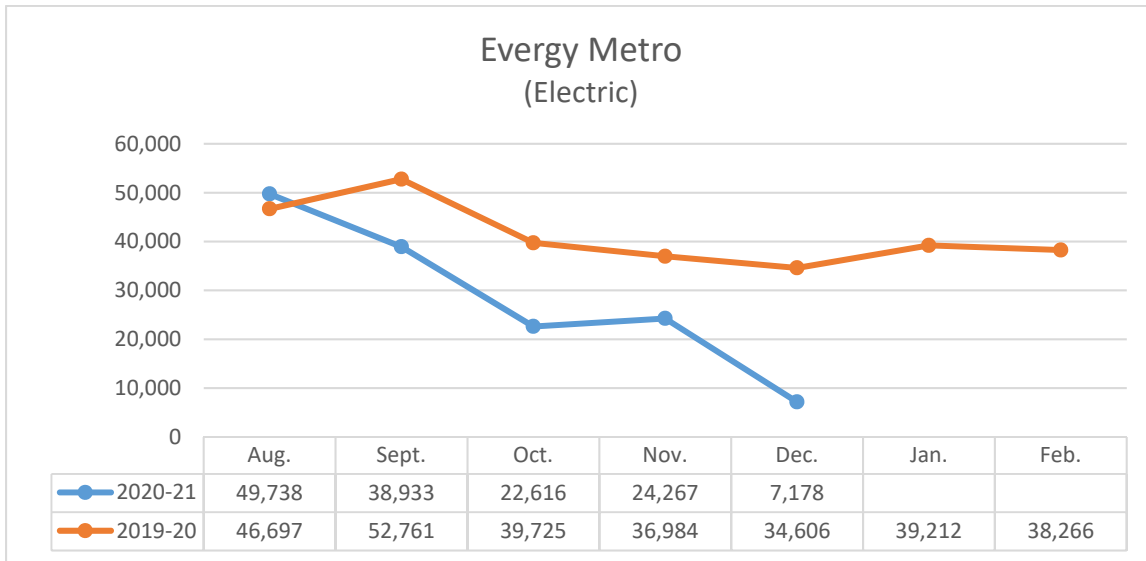
As shown in the previous graph, Evergy Metro performed approximately 60% fewer disconnections for non-payment in December 2020 versus December 2019 and about 94% less in December 2020 than in November 2020. The number of actual disconnections by Evergy Metro in December 2020 was approximately 59% below the number projected by Evergy Metro for the same month.

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”



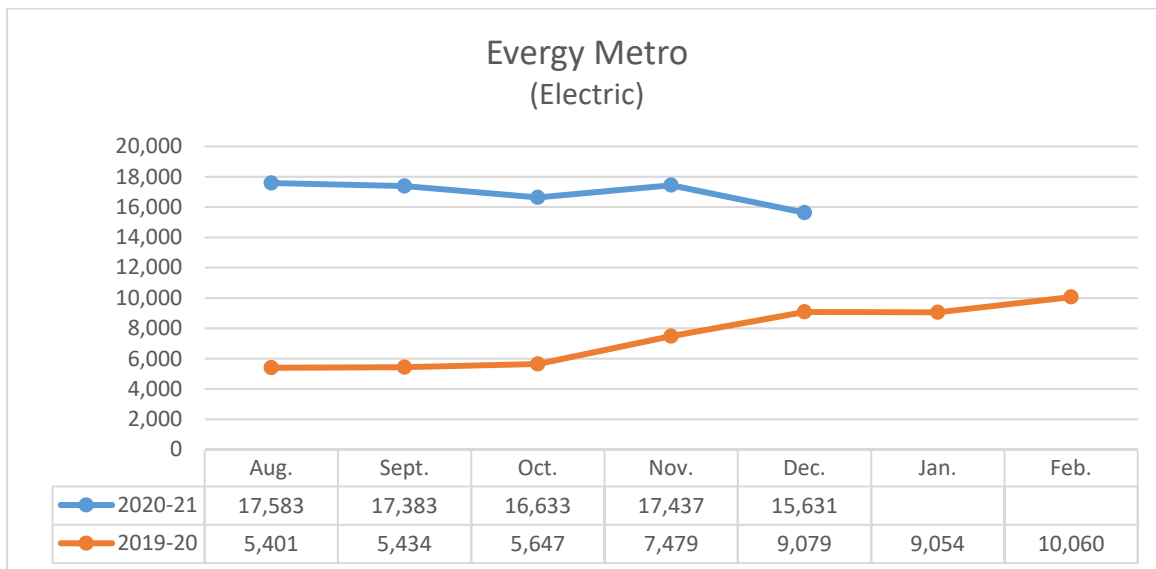
Evergy Metro submitted some revised data for Question 1b for August, September, October, and November 2020 when it submitted its December 2020 data. This corrected information is reflected in the above graph. The previous data indicates that there were about 7% more Evergy Metro customers with past-due accounts in December 2020 versus November 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 79% fewer customers who were not disconnected in December 2020 versus December 2019 and approximately 70% less in December 2020 than in November 2020.

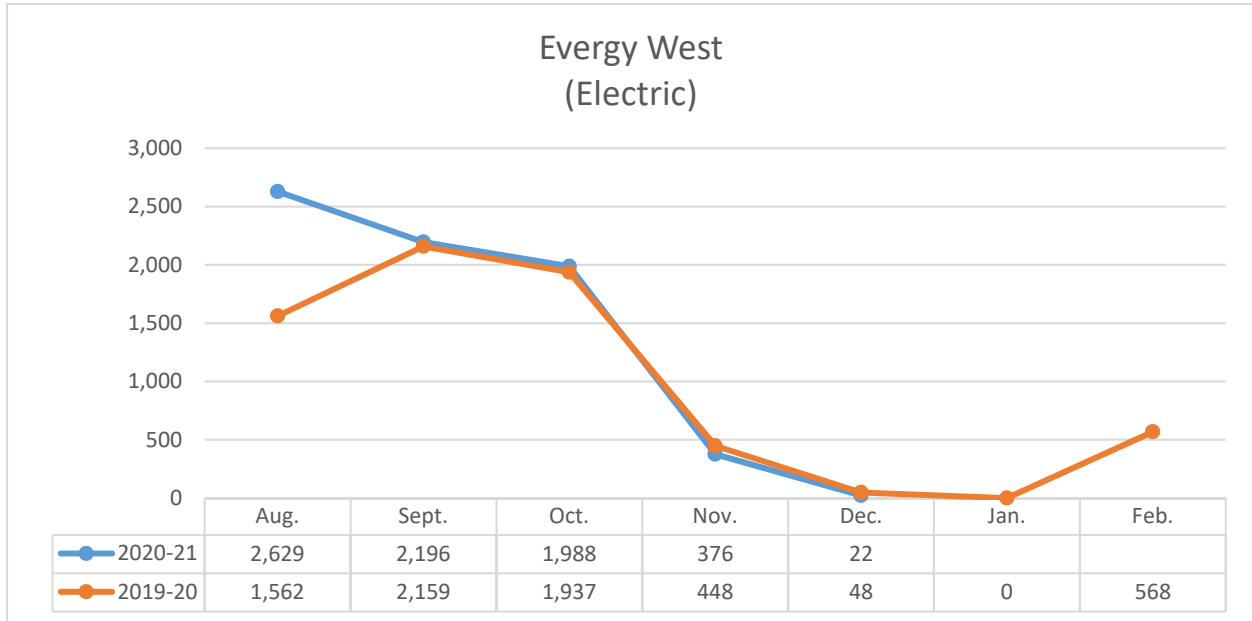
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 72% more Evergy Metro customers who participated in payment plans in December 2020 versus December 2019 and about 10% fewer in December 2020 than in November 2020.

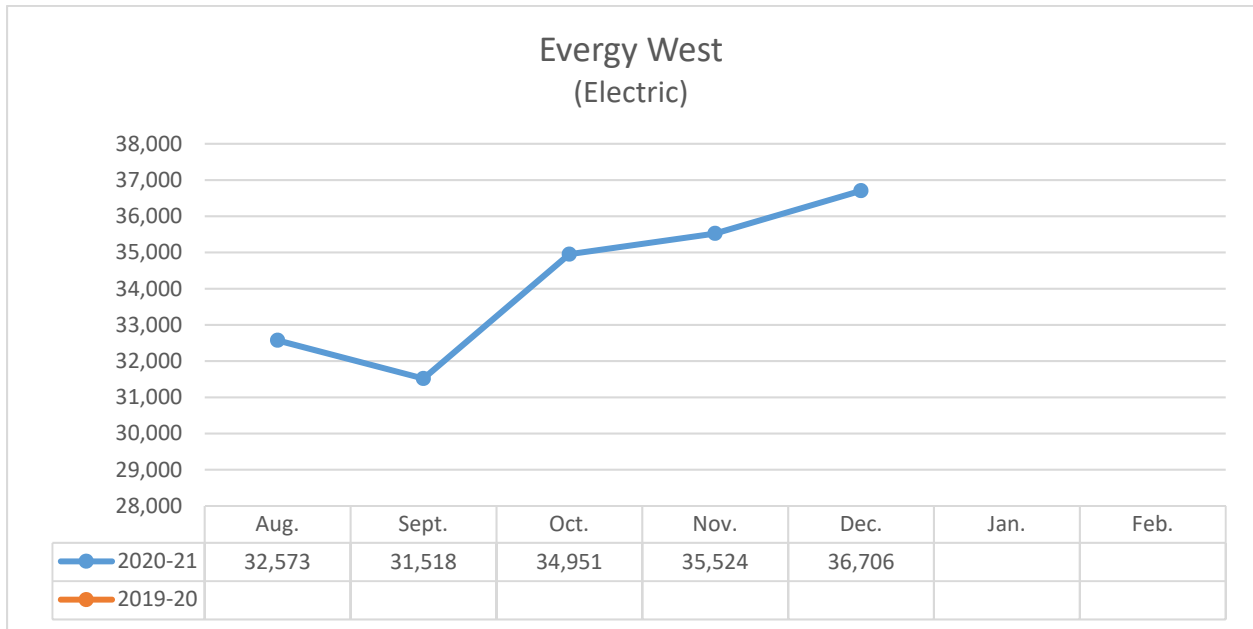
Questions 1 & 3 (Evergy West – Electric)

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



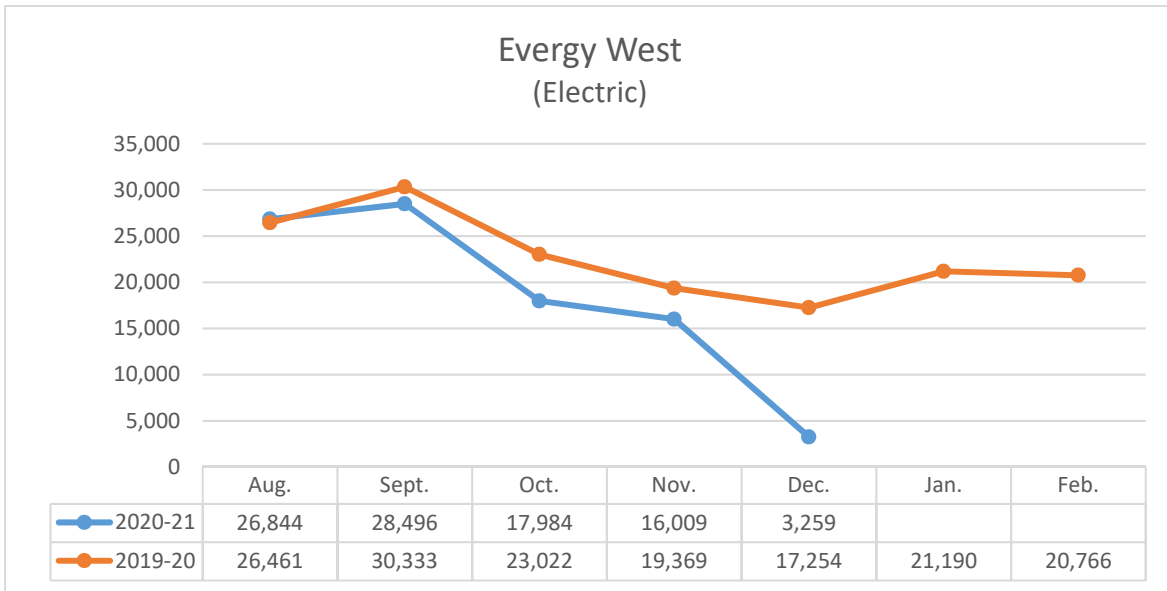
As shown in the previous graph, Evergy West performed approximately 54% fewer disconnections for non-payment in December 2020 versus December 2019 and about 94% fewer in December 2020 than in November 2020. The number of actual disconnections by Evergy West in December 2020 was approximately 63% below the number projected by Evergy West for the same month.

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”



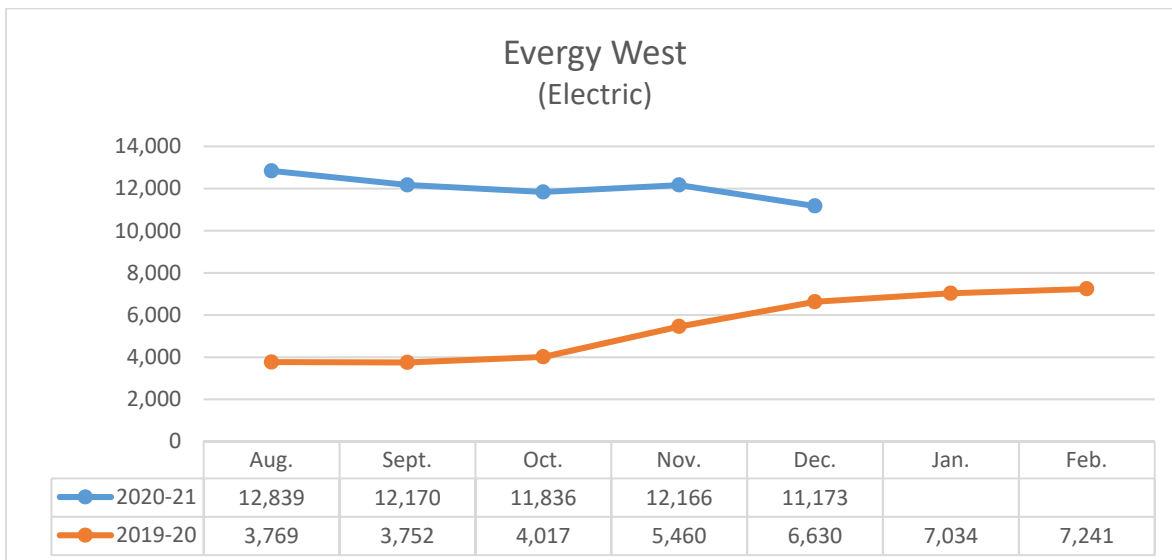
Evergy West submitted some revised data for Question 1b for August, September, October, and November 2020 when it submitted its December 2020 data. This corrected information is reflected in the above graph. The previous data indicates that there were about 3% more Evergy West customers with past-due accounts in December 2020 versus November 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 81% fewer customers who were not disconnected in December 2020 versus December 2019 and approximately 80% less in December 2020 than in November 2020.

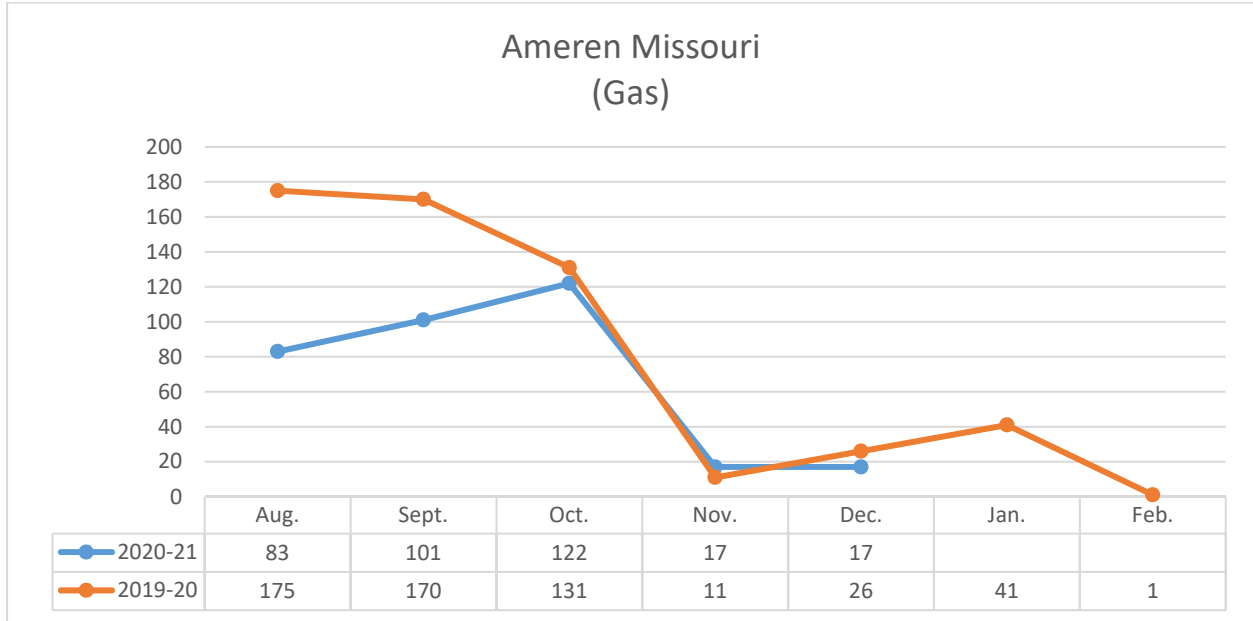
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 69% more Evergy West customers who participated in payment plans in December 2020 versus December 2019 and about 8% fewer in December 2020 than in November 2020.

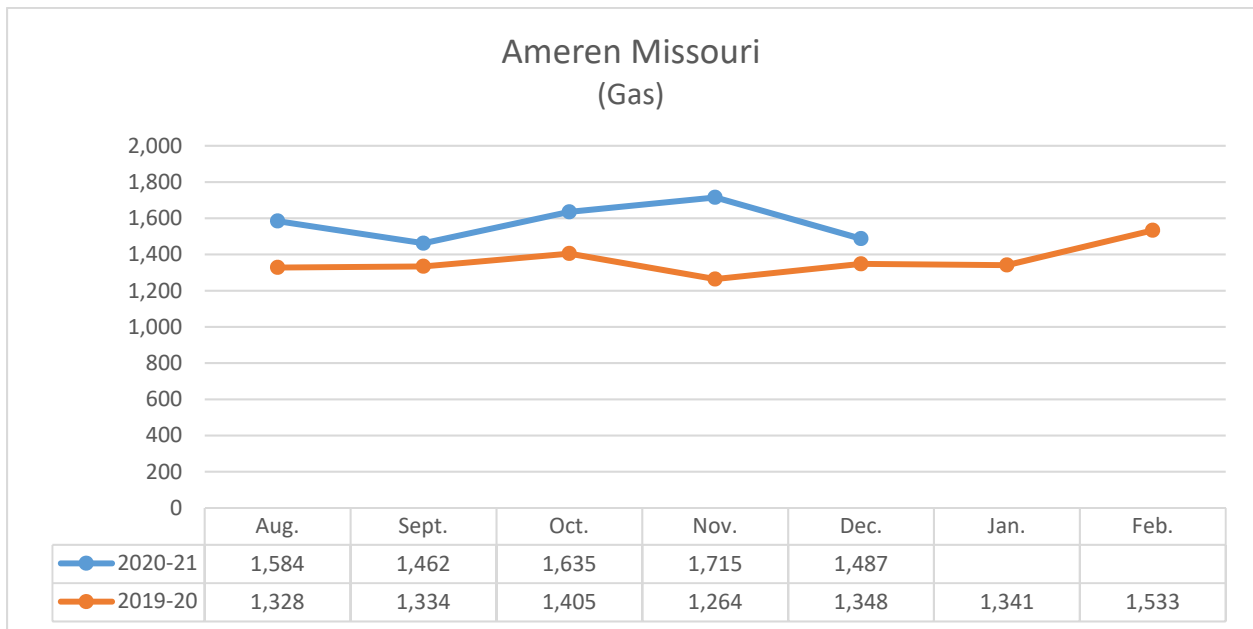
Questions 1 & 3 (Ameren Missouri – Gas)

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



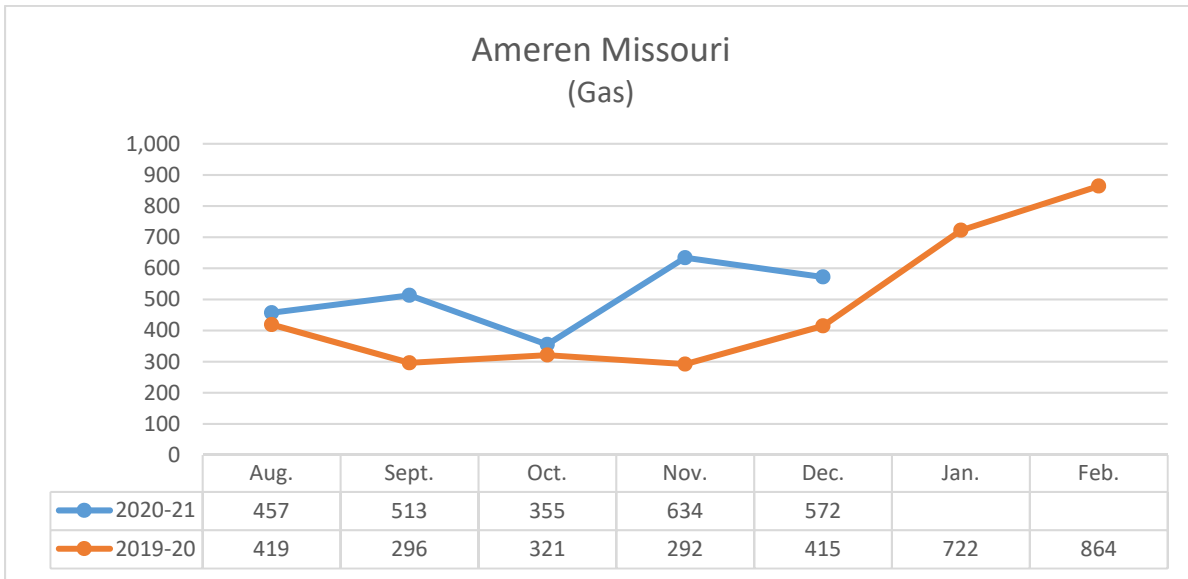
As shown in the previous graph, Ameren Missouri performed approximately 35% fewer disconnections for non-payment in December 2020 versus December 2019 and the same number in December 2020 as in November 2020. The number of actual disconnections by Ameren Missouri in December 2020 was approximately 51% below the number projected by Ameren Missouri for the same month.

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”



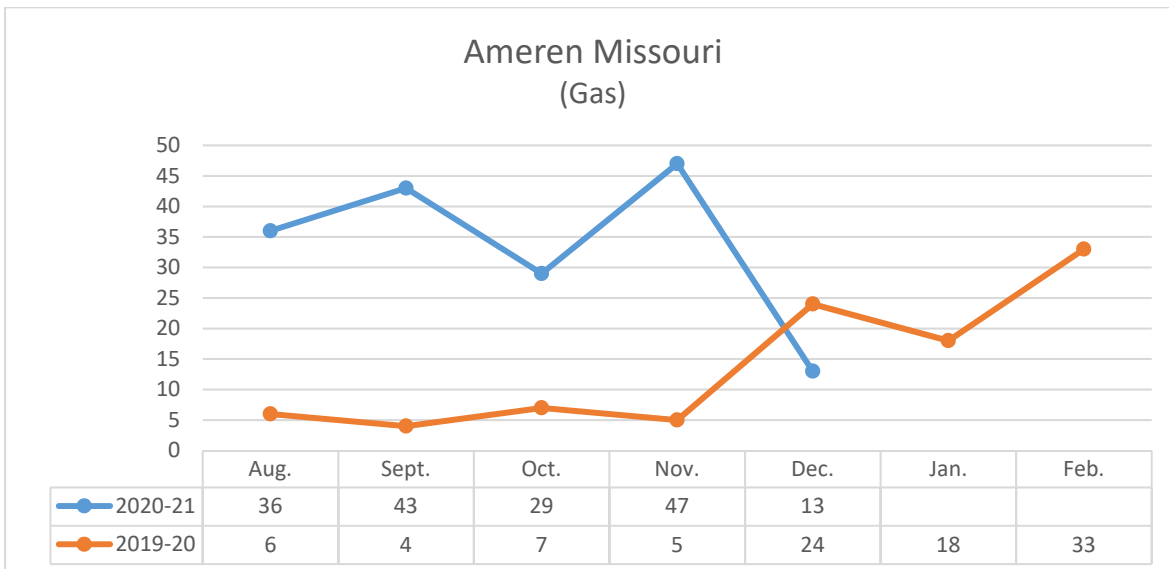
The previous data indicates that there were about 10% more Ameren Missouri customers with past-due accounts in December 2020 versus December 2019 and about 13% fewer in December 2020 than in November 2020. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

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 38% more customers who were not disconnected in December 2020 versus December 2019 and about 10% fewer in December 2020 than in November 2020.

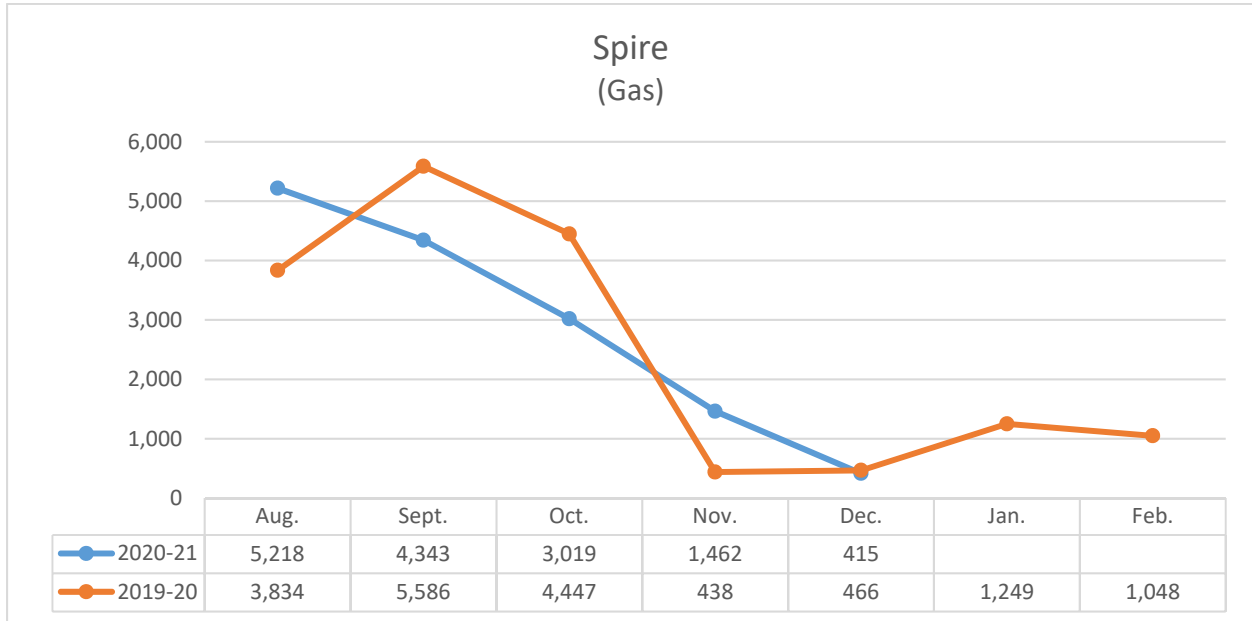
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 46% fewer Ameren Missouri customers who participated in payment plans in December 2020 versus December 2019 and about 72% less in December 2020 than in November 2020.

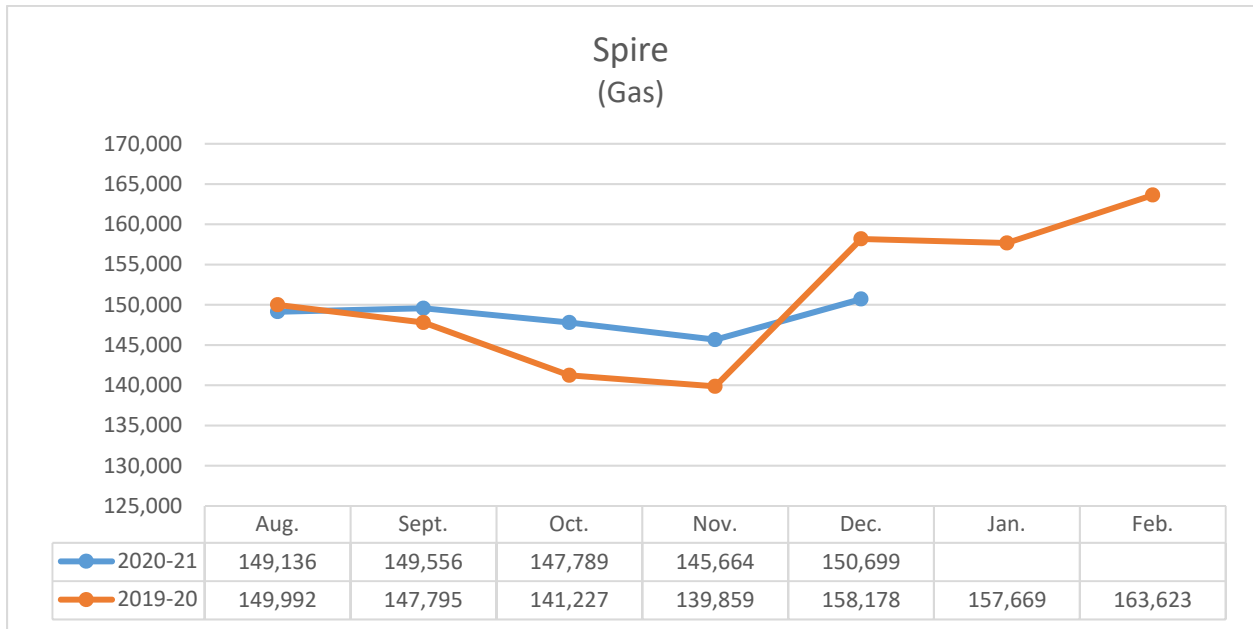
Questions 1 & 3 (Spire - Gas)

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



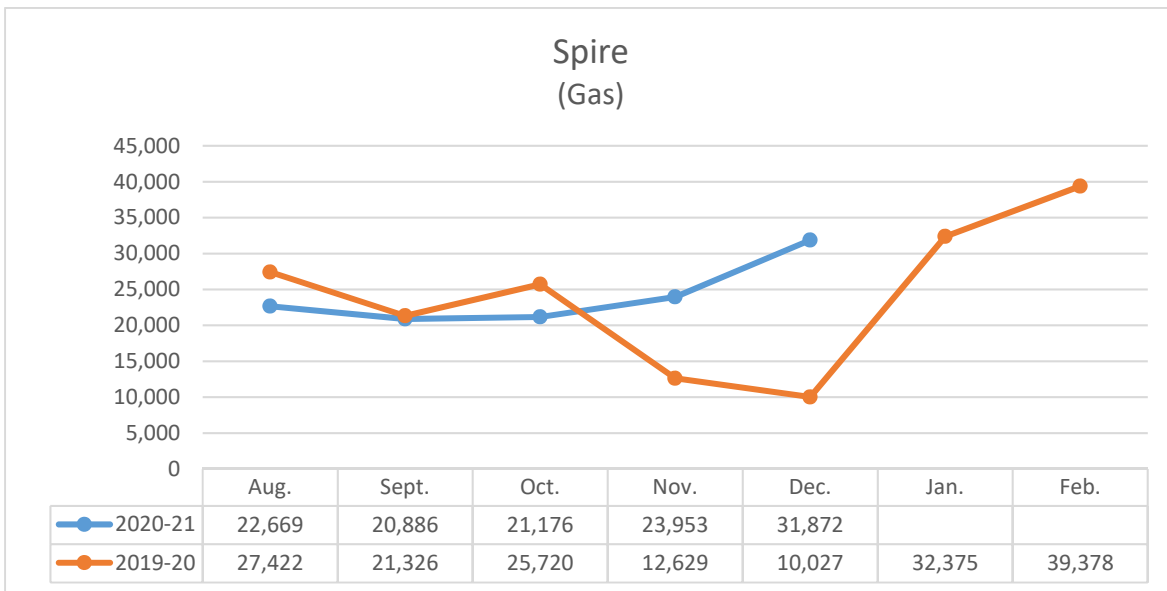
As shown in the previous graph, Spire performed approximately 11% fewer disconnections for non-payment in December 2020 versus December 2019 and approximately 72% less in December 2020 than in November 2020. The number of actual disconnections by Spire in December 2020 was approximately 57% below the number projected by Spire for the same month.

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”



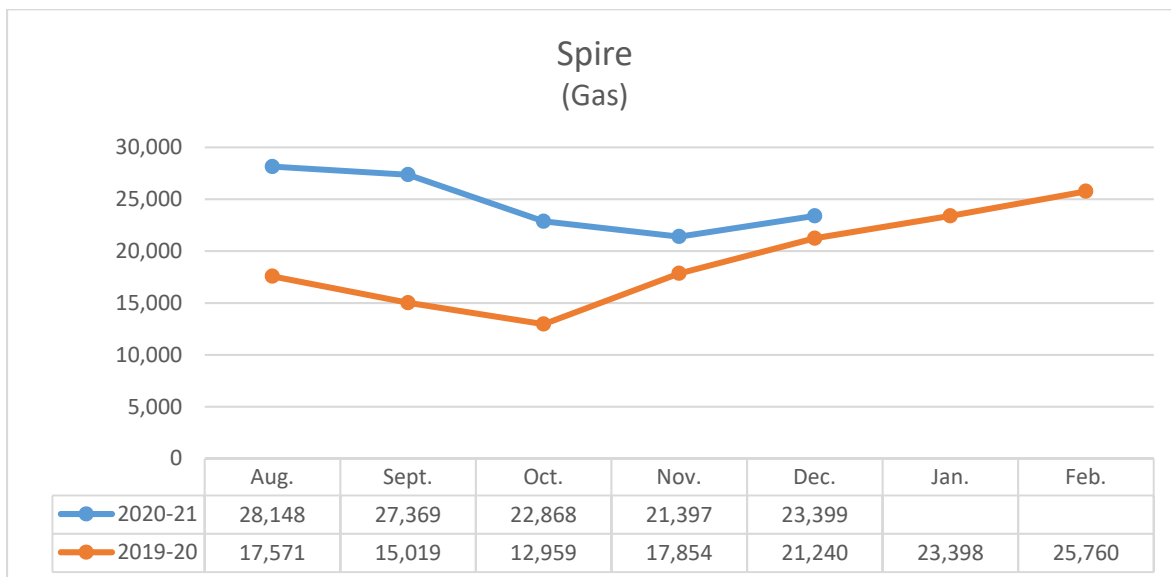
The previous data indicates that there were about 5% fewer Spire customers with past-due accounts in December 2020 versus December 2019 and approximately 4% more in December 2020 than in November 2020. Spire reported that past-due accounts are defined as accounts with arrear amounts owed for over 30 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 218% more customers who were not disconnected in December 2020 versus December 2019 and approximately 33% more in December 2020 than in November 2020.

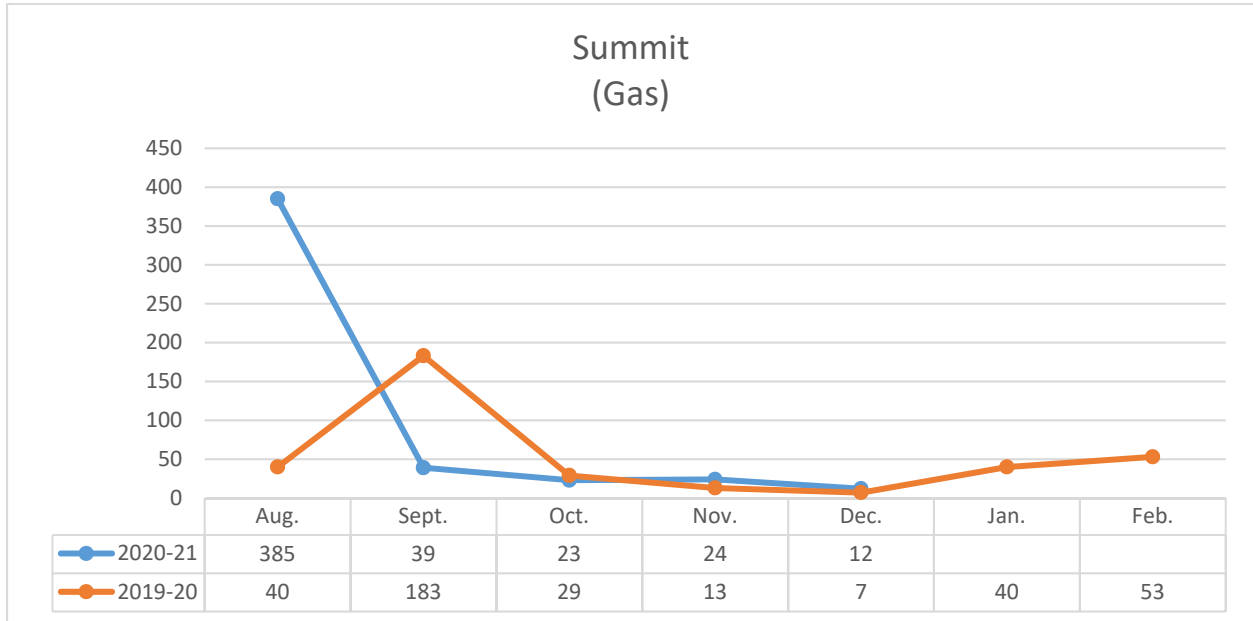
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 10% more Spire customers who participated in payment plans in December 2020 versus December 2019 and about 9% more in December 2020 than in November 2020.

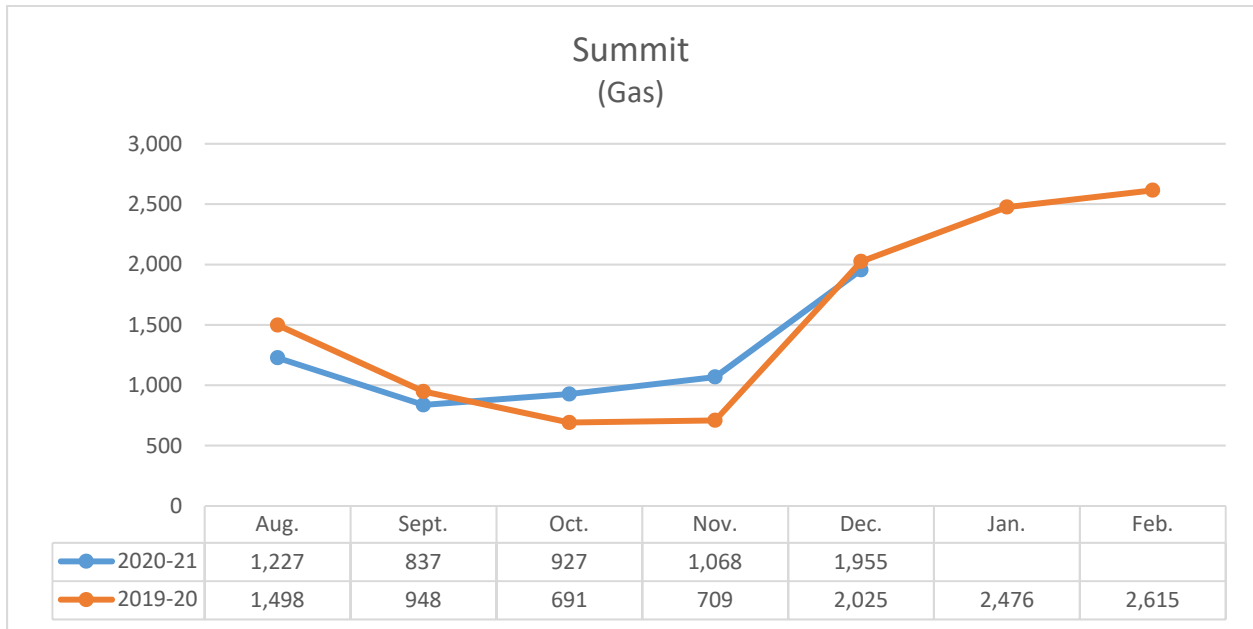
Questions 1 & 3 (Summit - Gas)

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



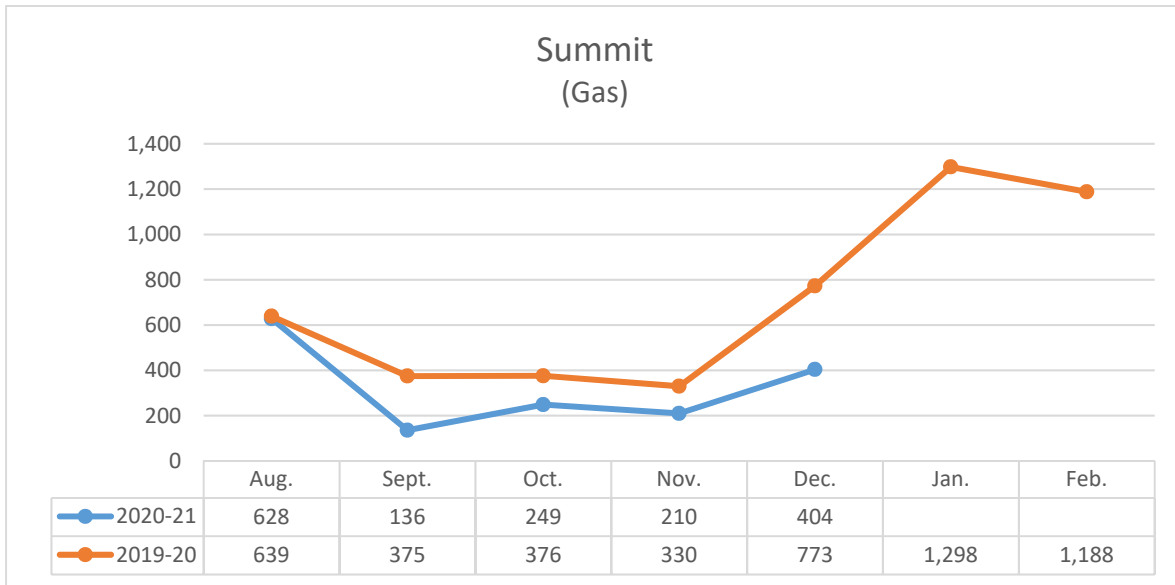
As shown in the previous graph, Summit performed approximately 71% more disconnections for non-payment in December 2020 versus December 2019 and about 50% fewer in December 2020 than in November 2020. The number of actual disconnections by Summit in December 2020 was approximately 71% above the number projected by Summit for the same month.

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”



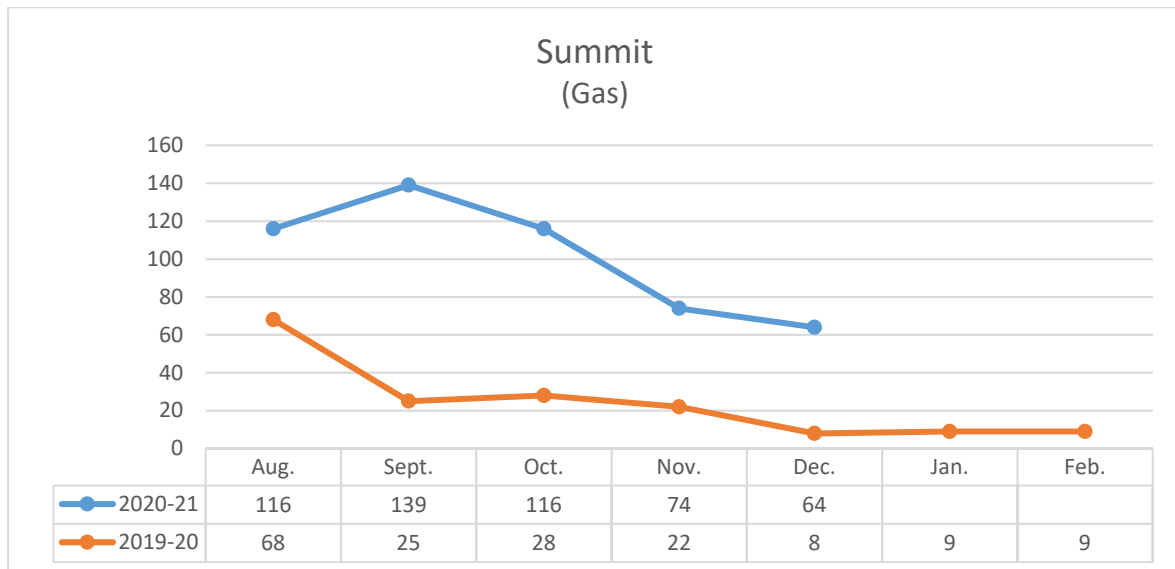
The previous data indicates that there were about 3% fewer Summit customers with past-due accounts in December 2020 versus December 2019 and approximately 83% more in December 2020 than in November 2020. Summit did not respond how it defines past-due accounts.

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 48% fewer customers who were not disconnected in December 2020 versus December 2019 and approximately 92% more in December 2020 than in November 2020.

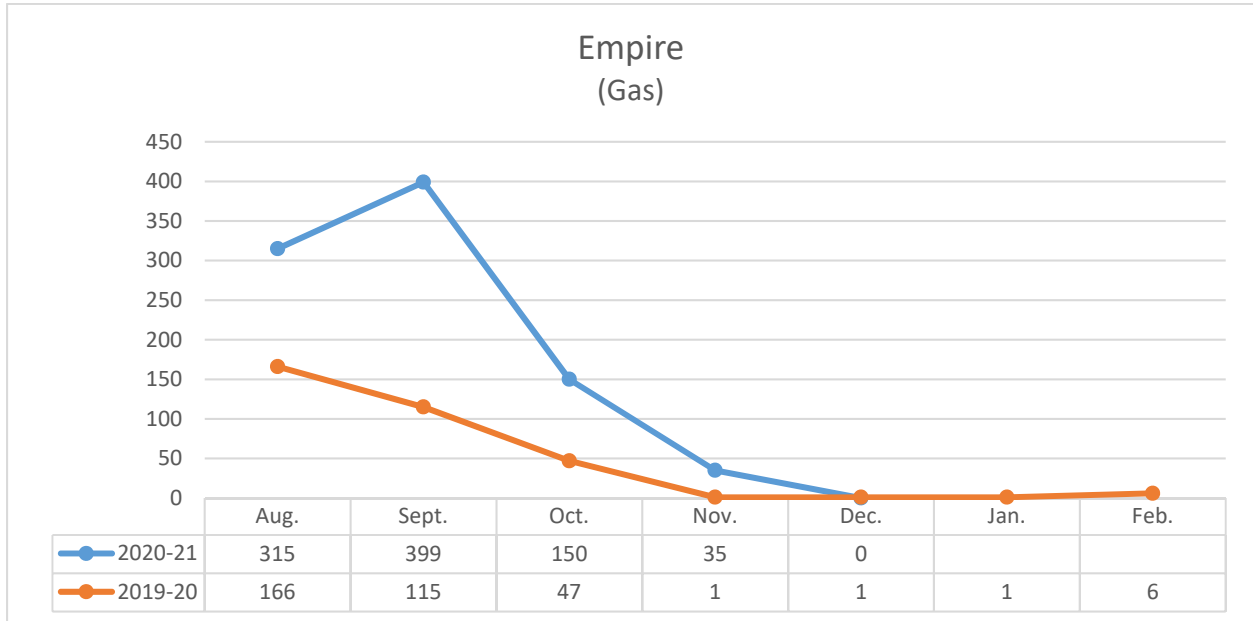
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 700% more Summit customers who participated in payment plans in December 2019 and about 14% fewer in December 2020 than in November 2020.

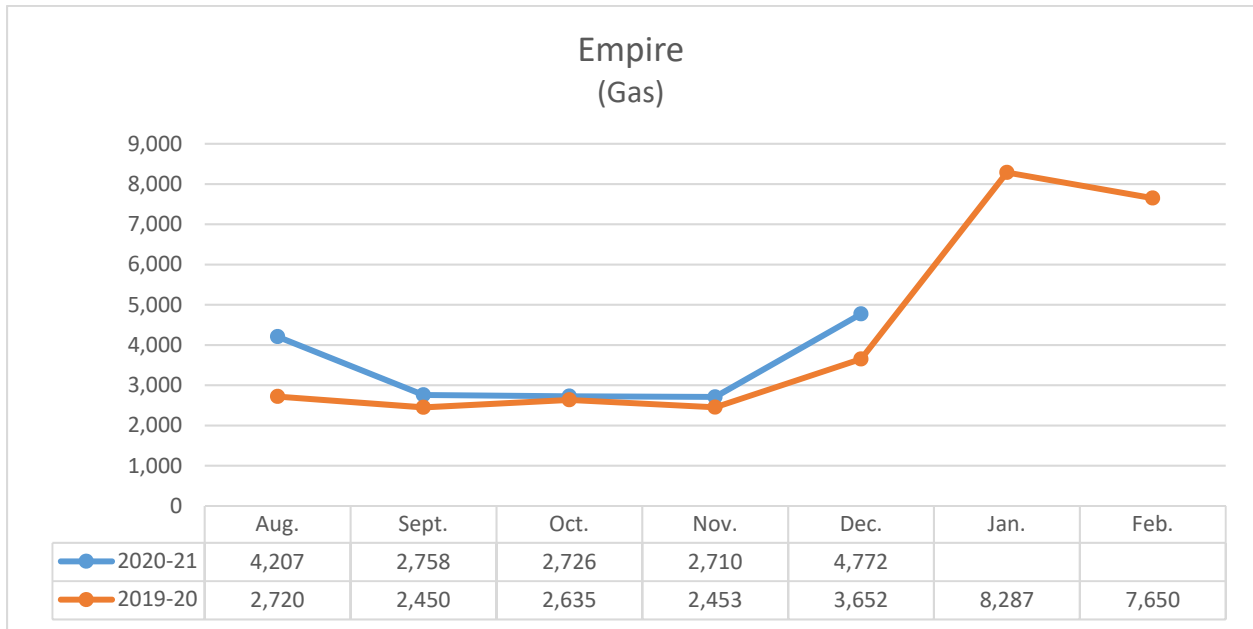
Questions 1 & 3 (Empire - Gas)

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



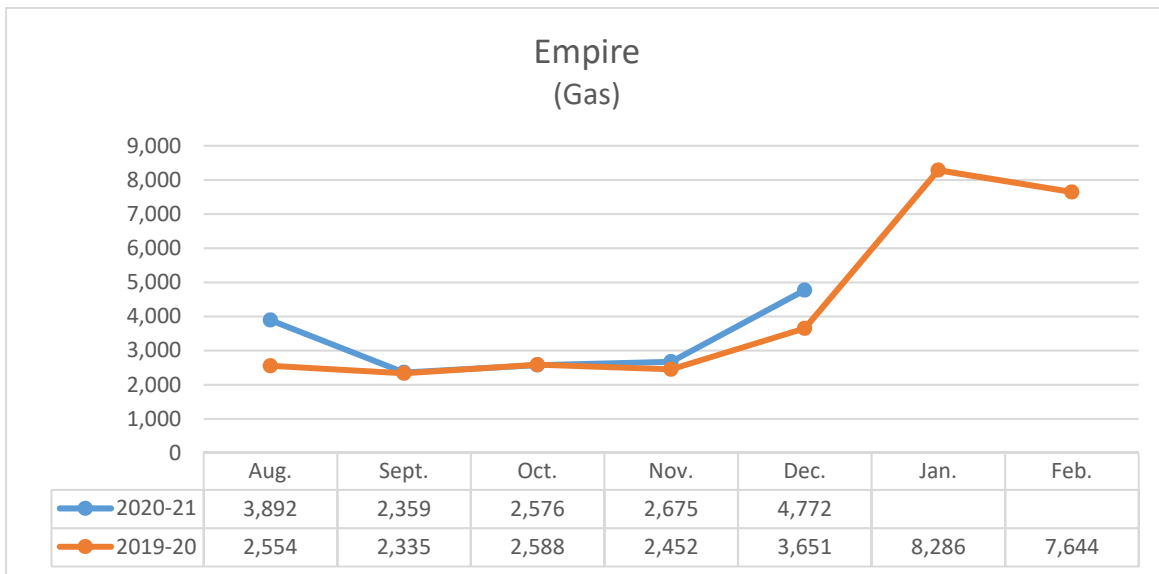
As shown in the previous graph, Empire performed no disconnections for non-payment in December 2020 versus one disconnection in December 2019, and the zero number of disconnections for non-payment in December 2020 compares to 35 in November 2020. Empire had earlier provided a projection that it would perform 50 disconnections in December 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”



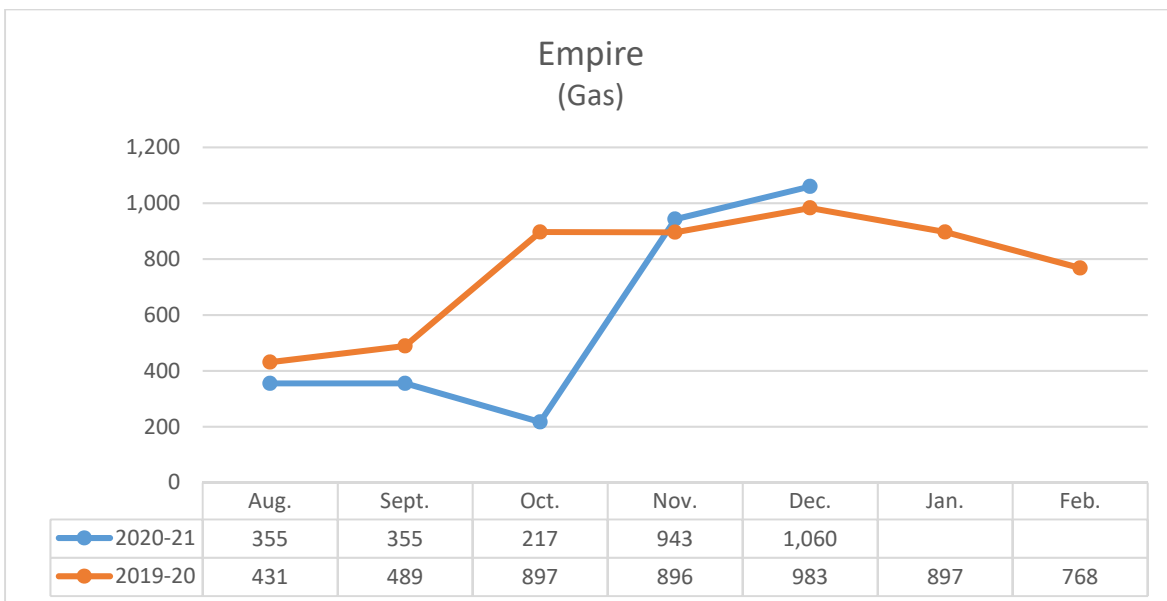
The previous data indicates that there were about 31% more Empire customers with past-due accounts in December 2020 versus December 2019 and approximately 76% more in December 2020 than in November 2020. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the 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 31% more customers who were not disconnected in December 2020 versus December 2019 and approximately 78% more in December 2020 than in November 2020.

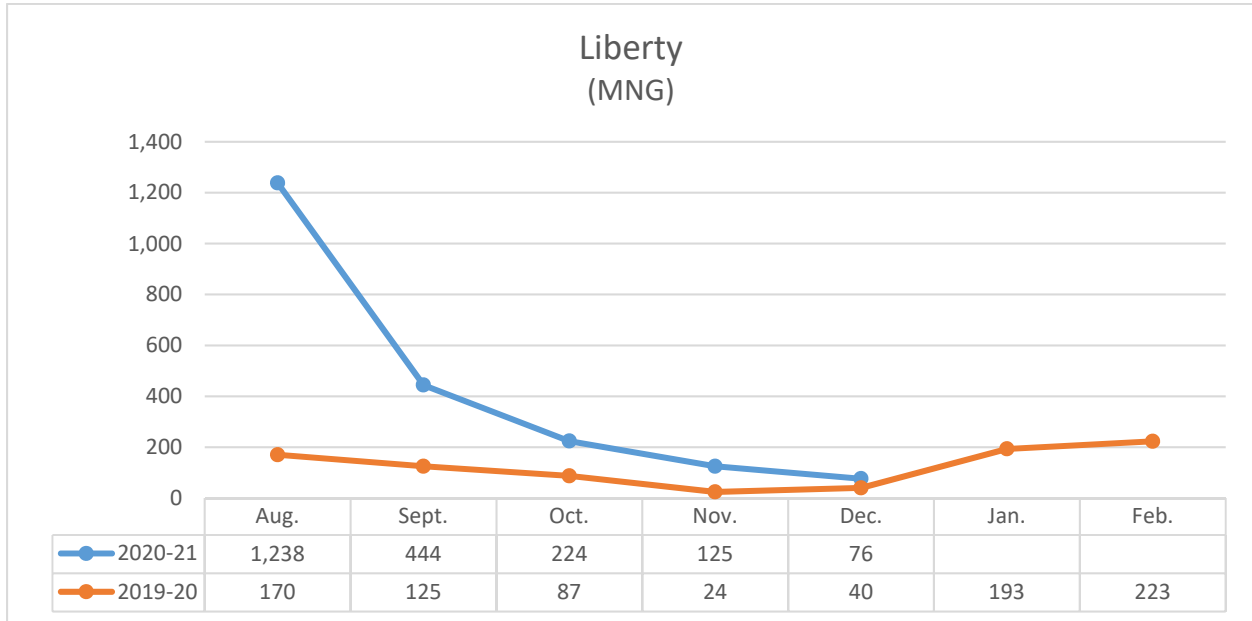
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 8% more Empire customers who participated in payment plans in December 2020 versus December 2019 and about 12% more in December 2020 than in November 2020.

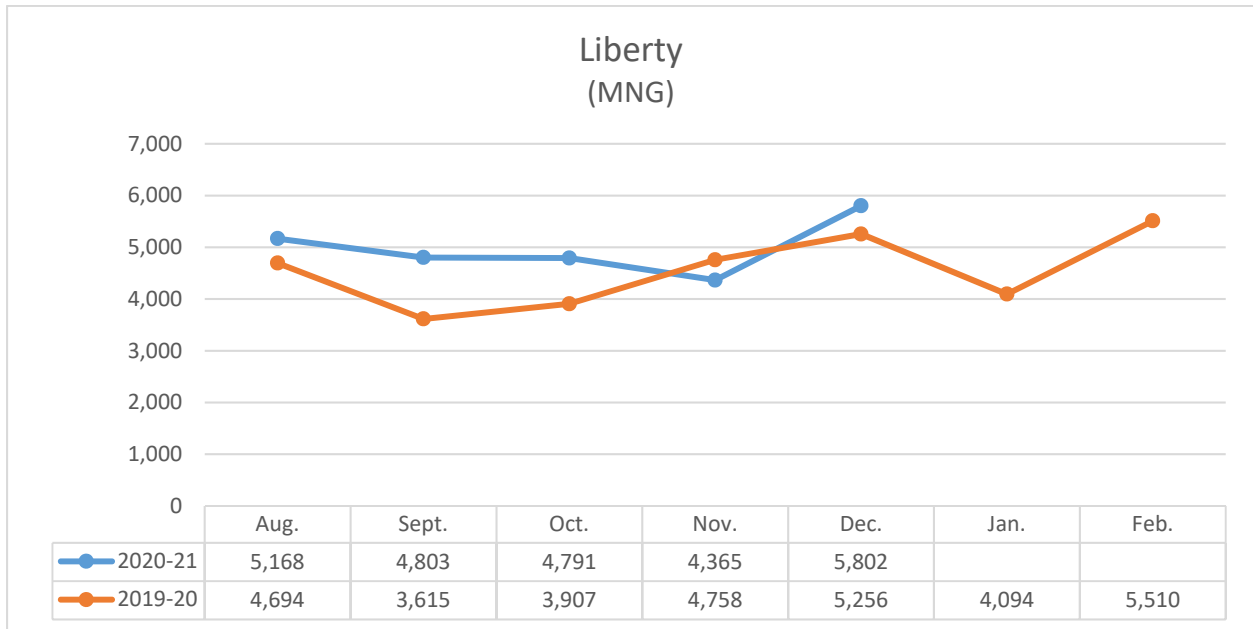
Questions 1 & 3 (Liberty - MNG - Gas)

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



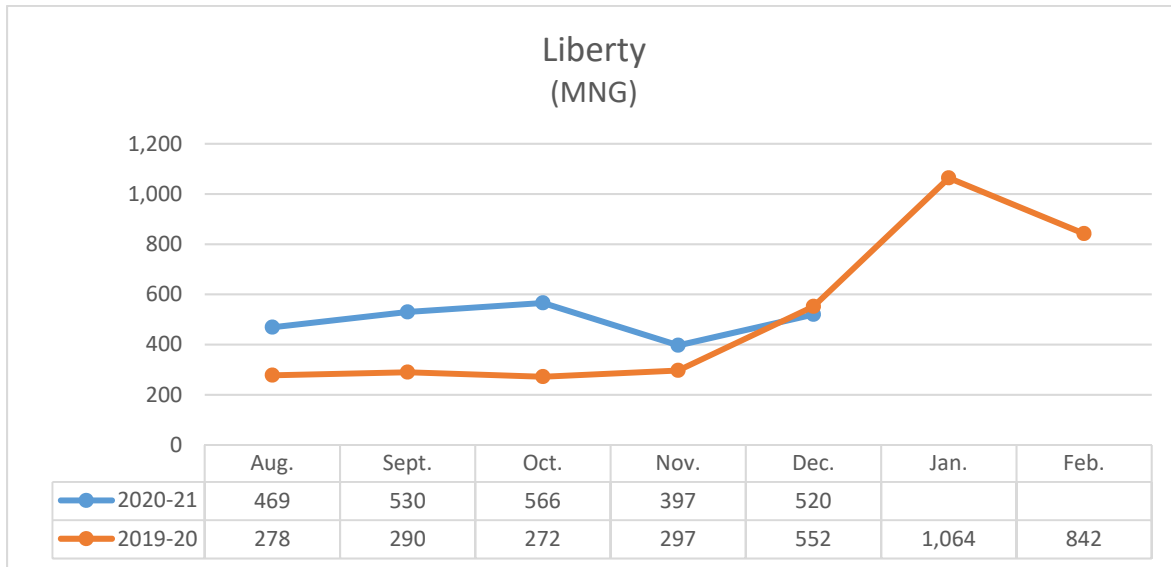
As shown in the previous graph, Liberty (MNG) performed approximately 90% more disconnections for non-payment in December 2020 versus December 2019 and about 39% less in December 2020 than in November 2020. The number of actual disconnections by Liberty (MNG) in December 2020 was approximately 204% above the number projected by Liberty (MNG) for the same month.

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”



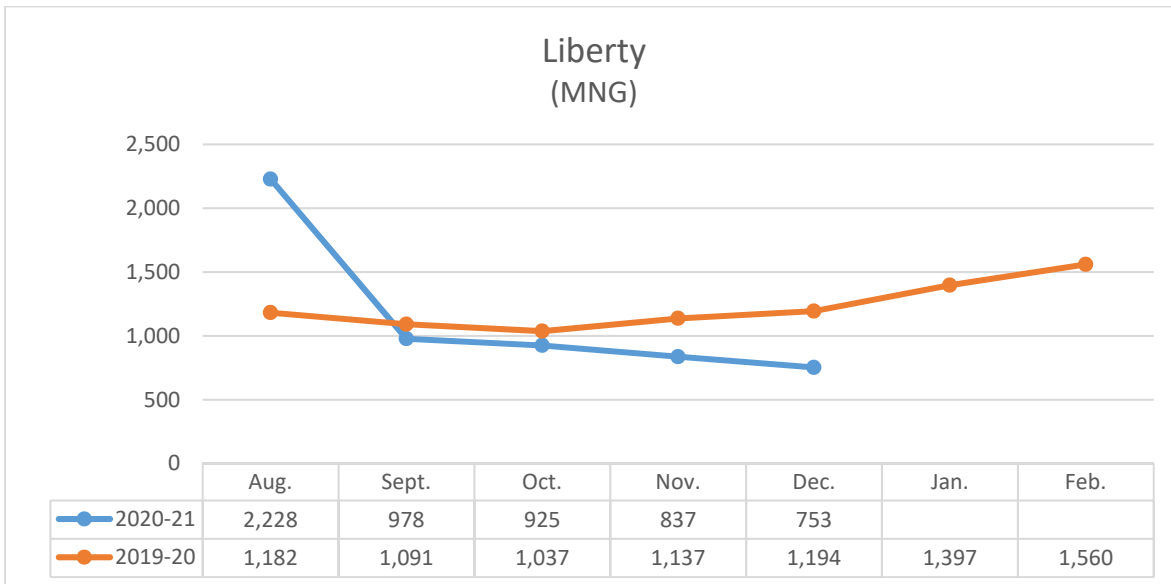
The previous data indicates that there were about 10% more Liberty (MNG) customers with past-due accounts in December 2020 versus December 2019 and approximately 33% more in December 2020 than in November 2020. Liberty (MNG) reported that it considers accounts past-due when they have a past-due balance 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 6% fewer customers who were not disconnected in December 2020 versus December 2019 and approximately 31% more in December 2020 than in November 2020.

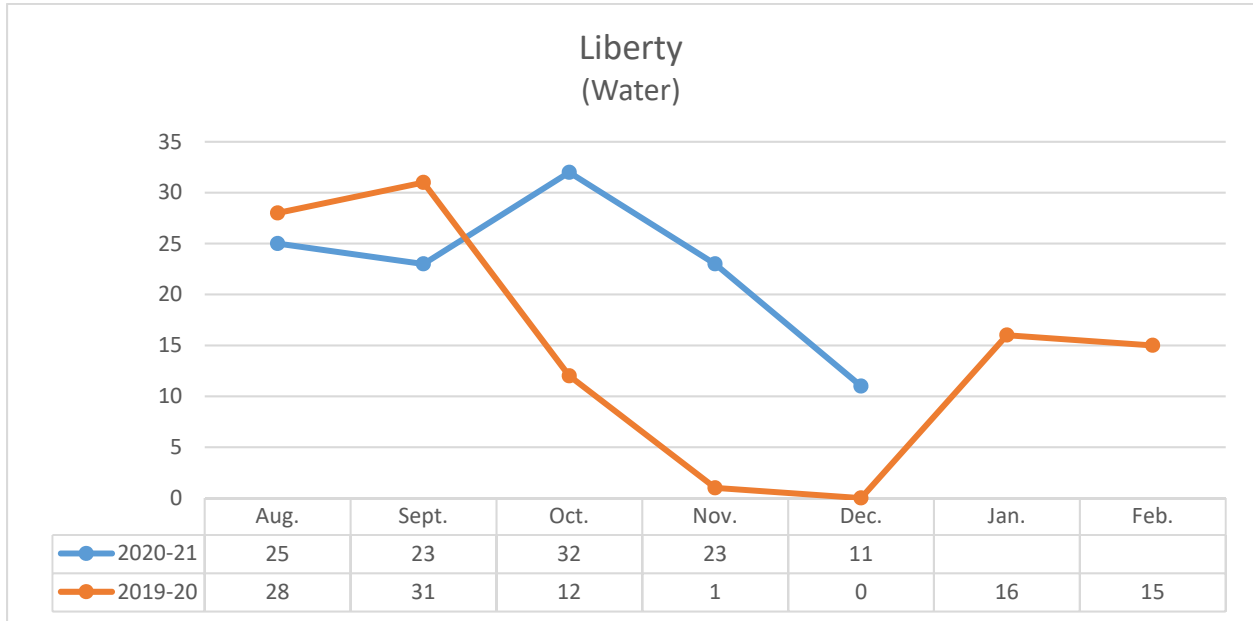
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 37% less Liberty (MNG) customers who participated in payment plans in December 2020 versus December 2019 and 10% less in December 2020 than in November 2020.

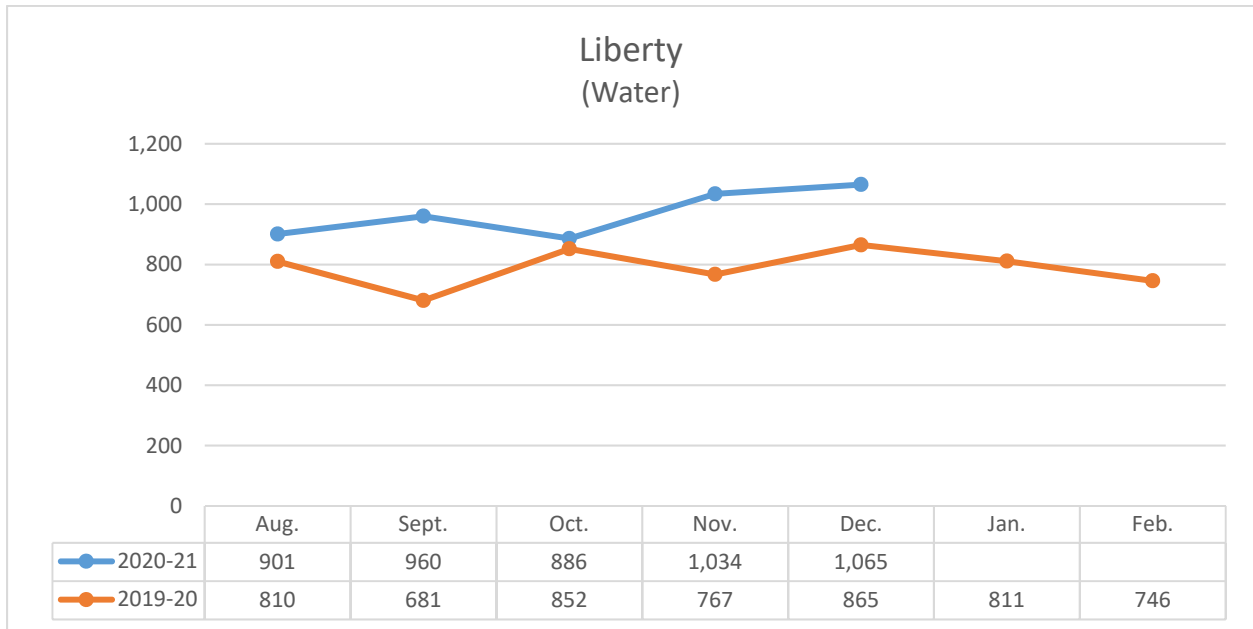
Questions 1 & 3 (Liberty - Water)

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



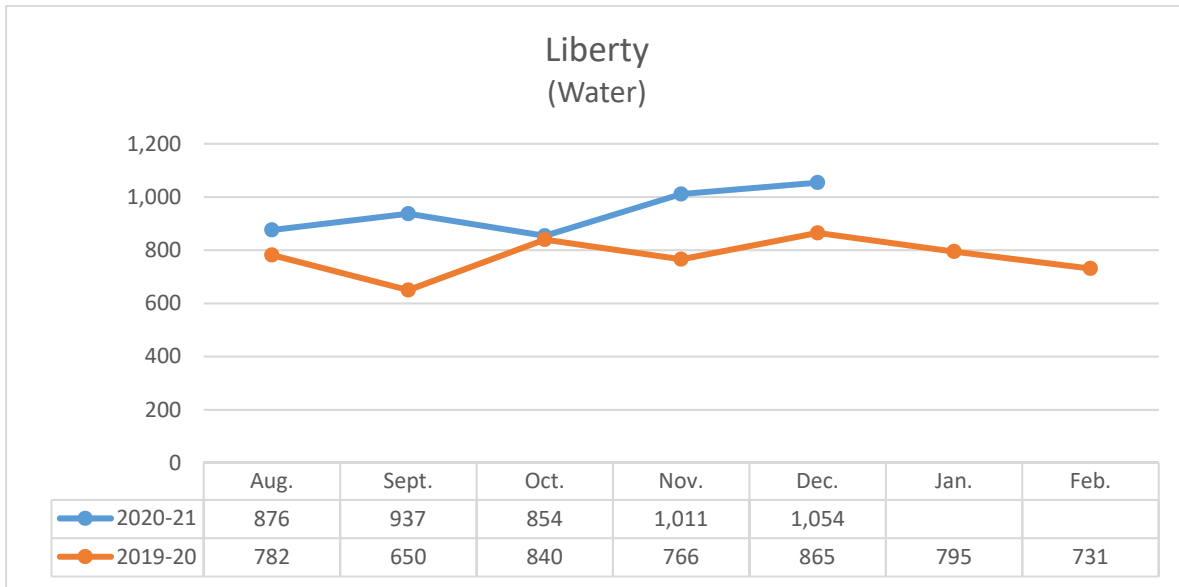
As shown in the previous graph, Liberty performed 11 disconnections for non-payment in December 2020 versus 0 in December 2019 and about 52% fewer in December 2020 than in November 2020. The number of actual disconnections by Liberty in December 2020 was approximately 73% below the number projected by Liberty for the same month.

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”



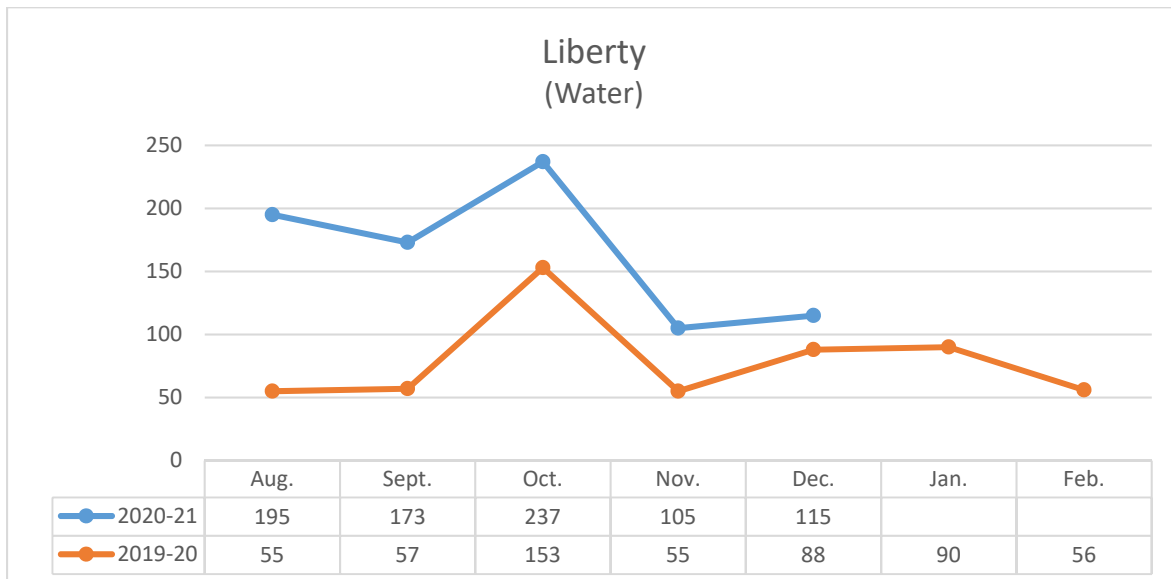
The previous data indicates that there were about 23% more Liberty customers with past-due accounts in December 2020 versus December 2019 and approximately 3% more in December 2020 than in November 2020. Liberty reported that a shut-off notice is sent for any account that owes \$50.00 or more after the 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 22% more customers who were not disconnected in December 2020 versus December 2019 and approximately 4% more in December 2020 than in November 2020.

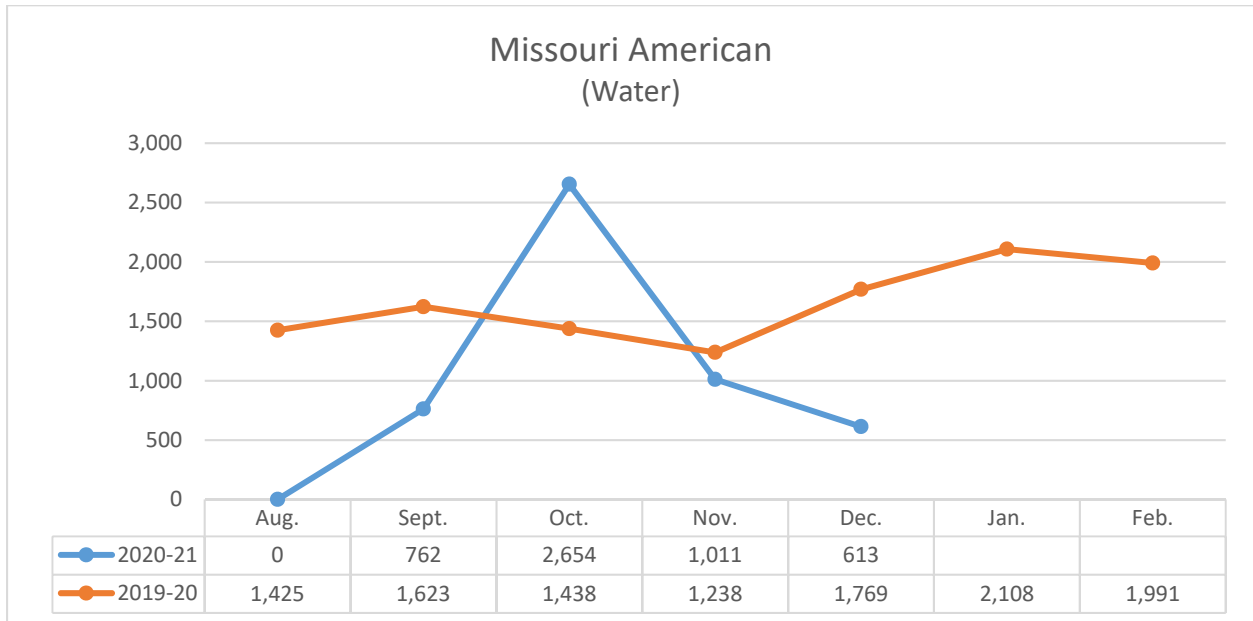
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 31% more Liberty customers who participated in payment plans in December 2020 versus December 2019 and about 10% more in December 2020 than in November 2020.

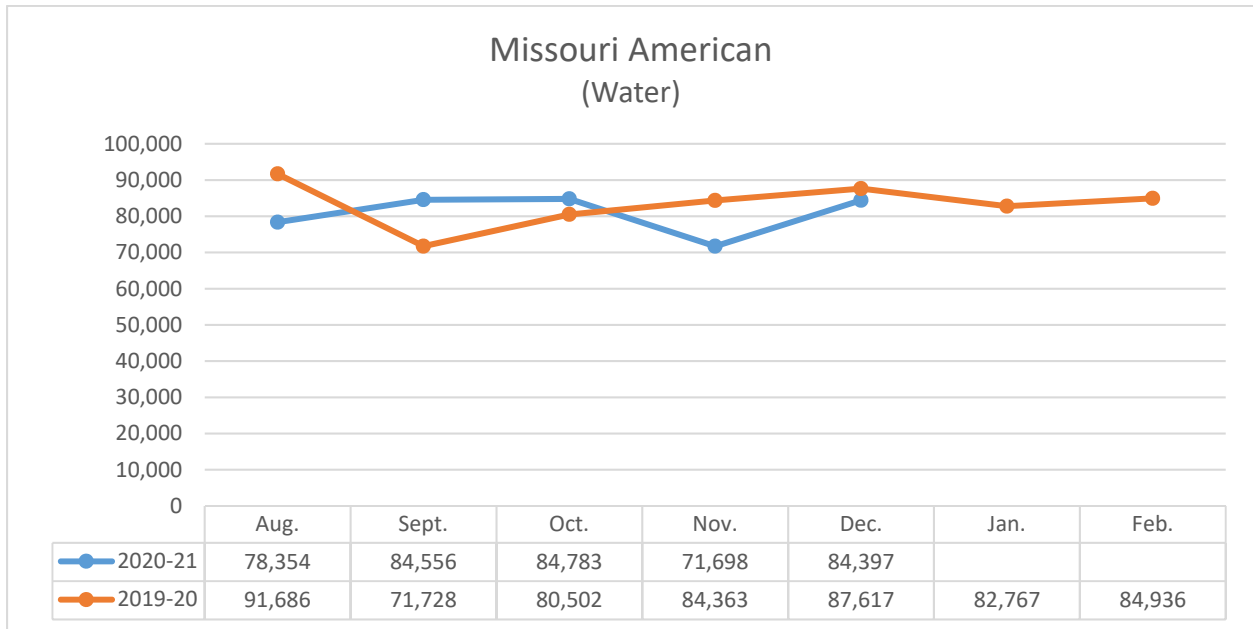
Questions 1 & 3 (Missouri American - Water)

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



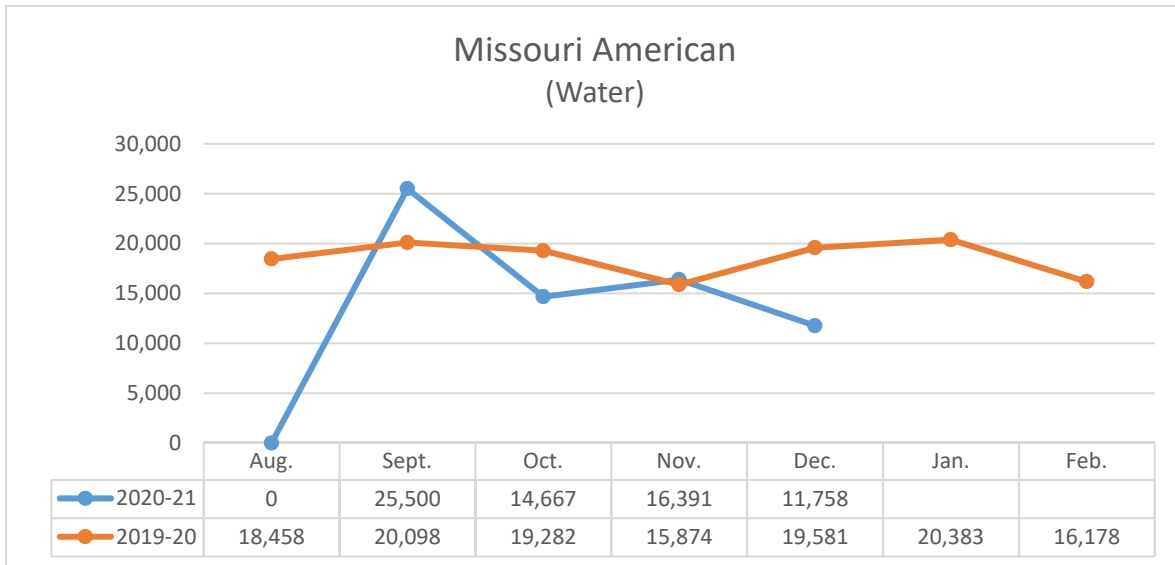
As shown in the previous graph, Missouri American performed approximately 65% fewer disconnections for non-payment in December 2020 versus December 2019 and about 39% less in December 2020 than in November 2020. Missouri American does not forecast the number of disconnections for non-payment.

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”



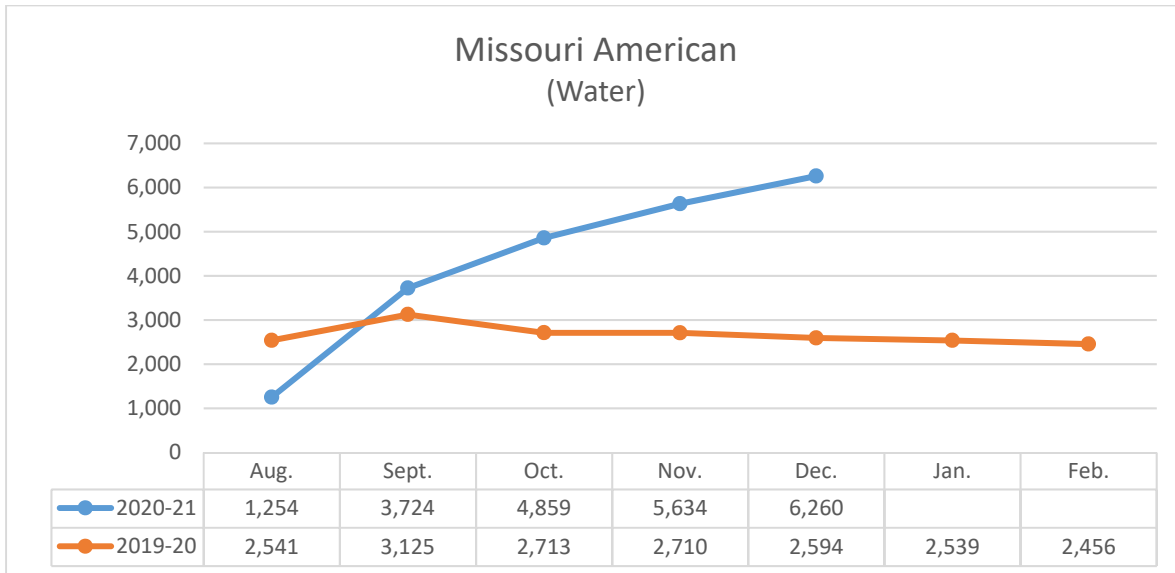
The previous data indicates that there were about 4% fewer Missouri American customers with past-due accounts in December 2020 versus December 2019 and approximately 18% more in December 2020 than in November 2020. Missouri American reported that it defines “past-due” as any unpaid amount past the due 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 40% fewer customers who were not disconnected in December 2020 versus December 2019 and approximately 28% less in December 2020 than in November 2020.

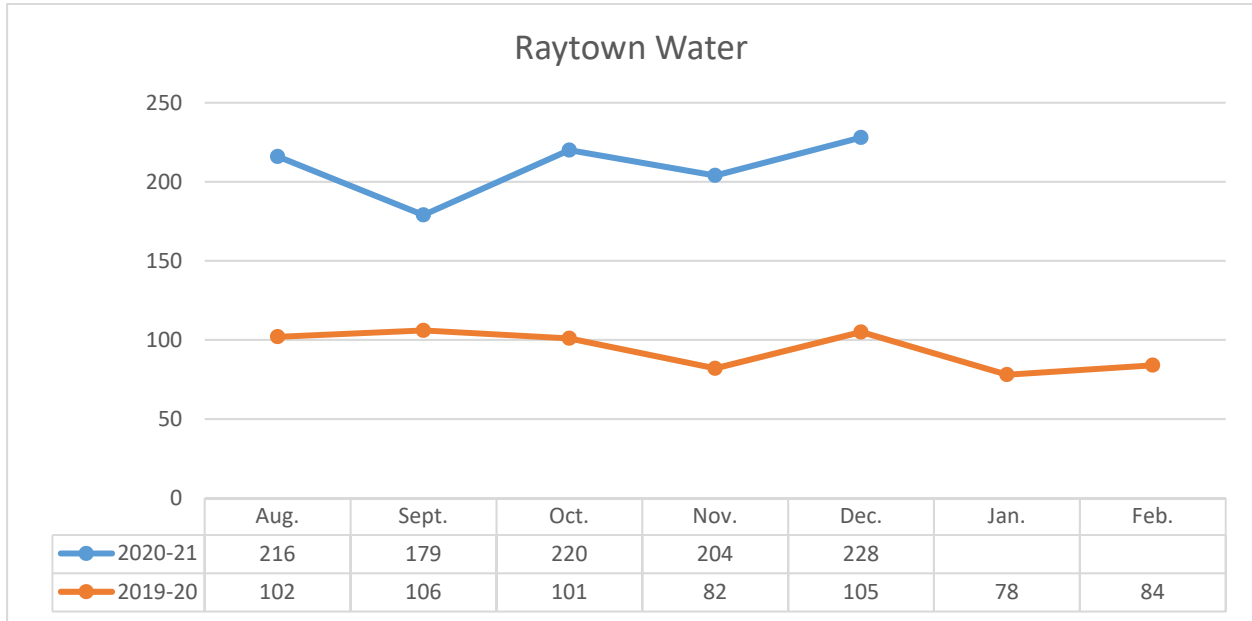
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 141% more Missouri American customers who participated in payment plans in December 2020 versus December 2019 and about 11% more in December 2020 than in November 2020.

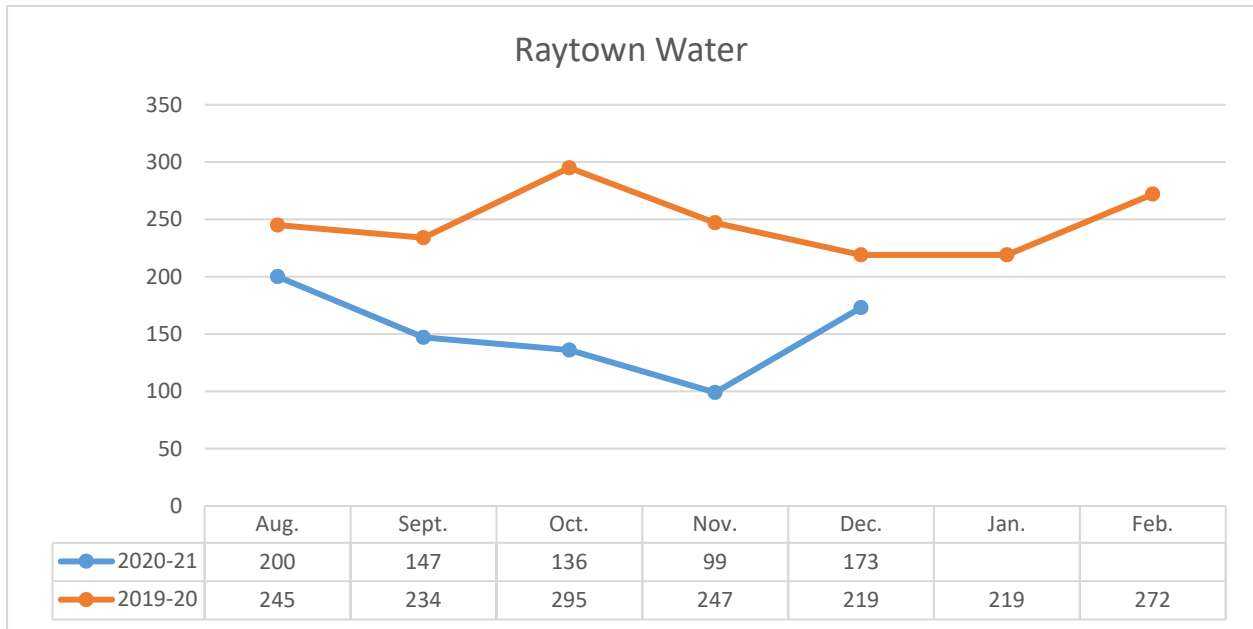
Questions 1 & 3 (Raytown Water)

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



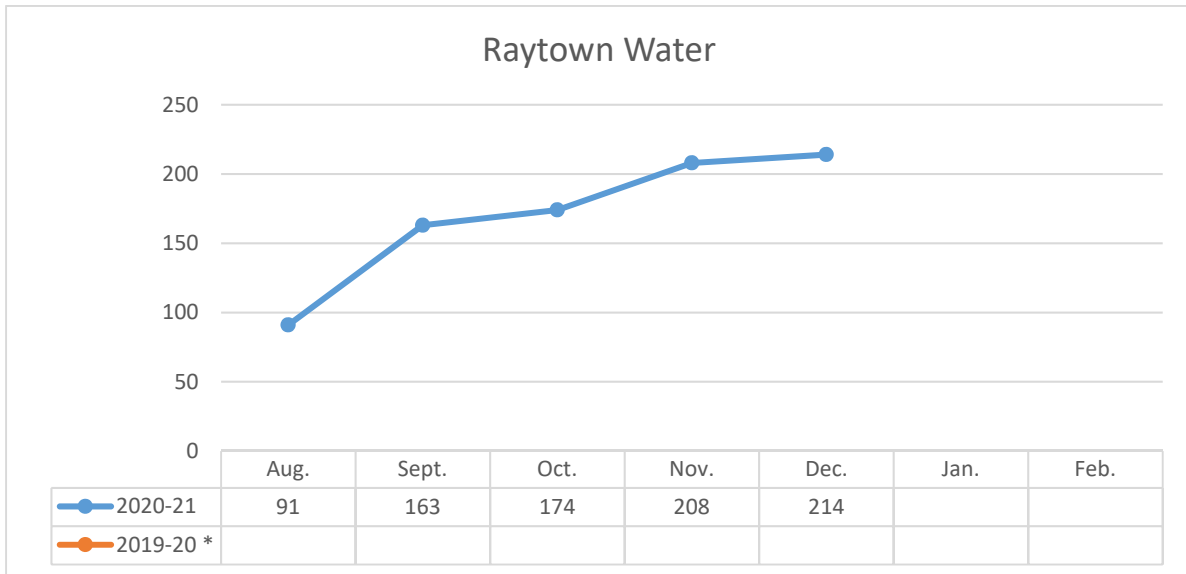
As shown in the previous graph, Raytown Water performed approximately 117% more disconnections for non-payment in December 2020 versus December 2019 and about 12% more in December 2020 than in November 2020. The number of actual disconnections by Raytown Water in December 2020 was approximately 159% above the number projected by Raytown Water for the same month.

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 21% fewer Raytown Water customers with past-due accounts in December 2020 versus December 2019 and approximately 75% more in December 2020 than in November 2020. Raytown Water reported that it defines “past-due” as accounts with balances that are over 31 days.

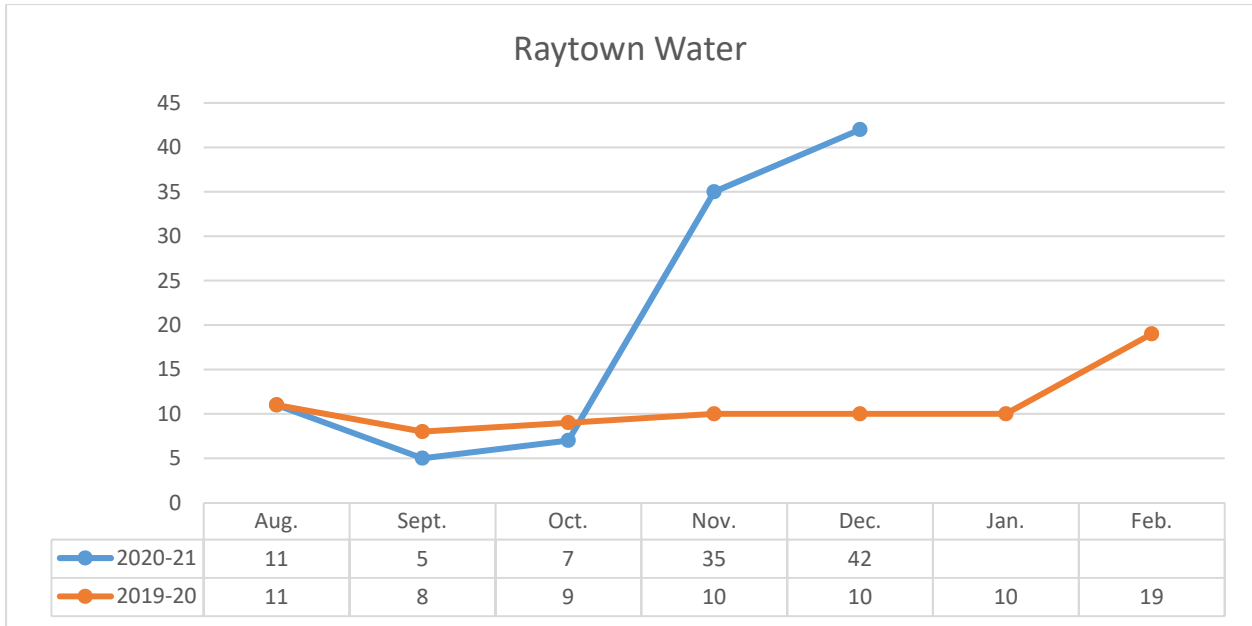
c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



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

As shown by Raytown Water’s data, 214 customers received a final disconnection notice in December 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 3% more customers that received a final disconnection notice but were not disconnected for non-payment of service in December 2020 than in November 2020.

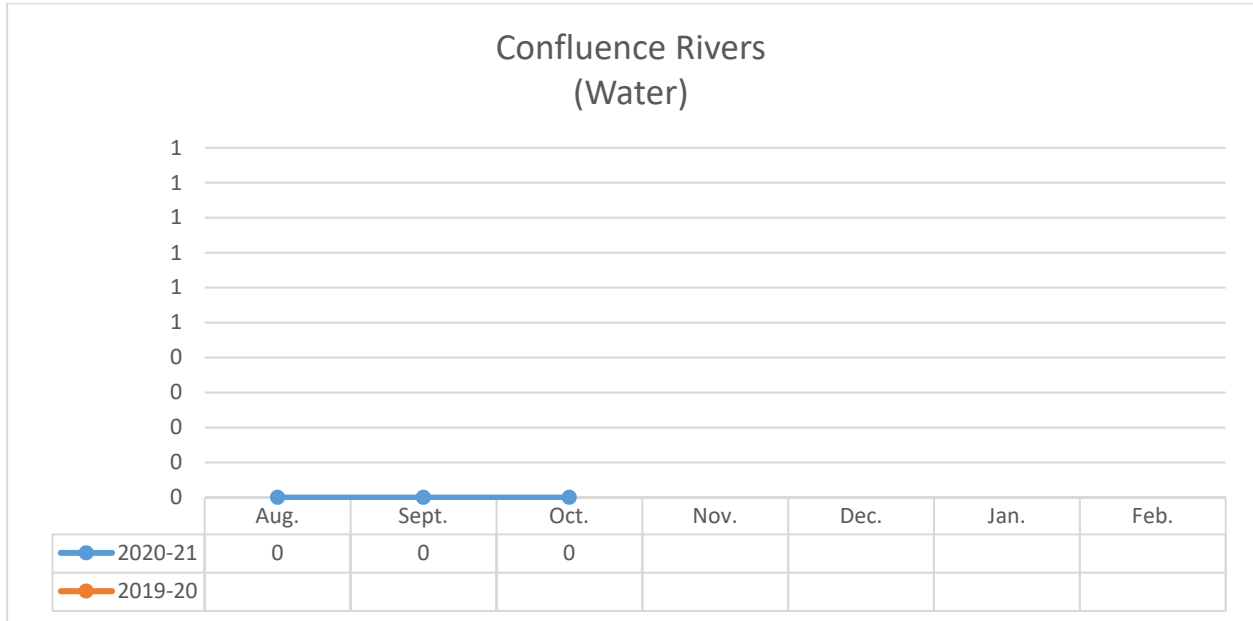
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 320% more Raytown Water customers who participated in payment plans in December 2020 versus December 2019 and about 20% more in December 2020 than in November 2020.

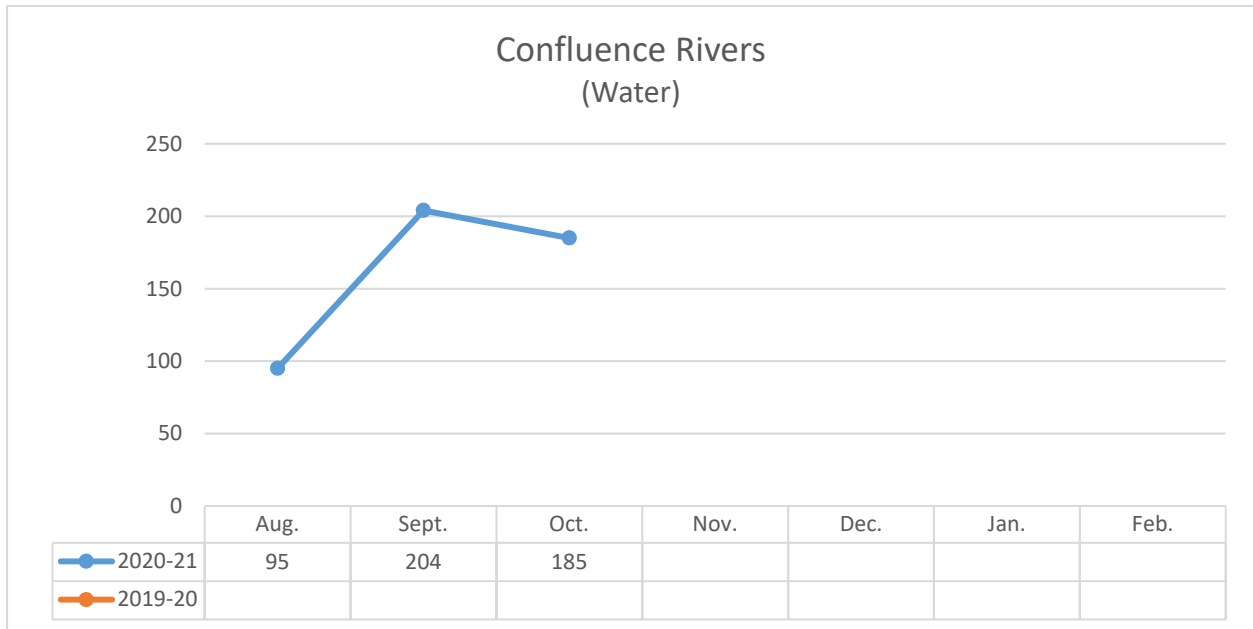
Questions 1 & 3 (Confluence Rivers - Water)

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



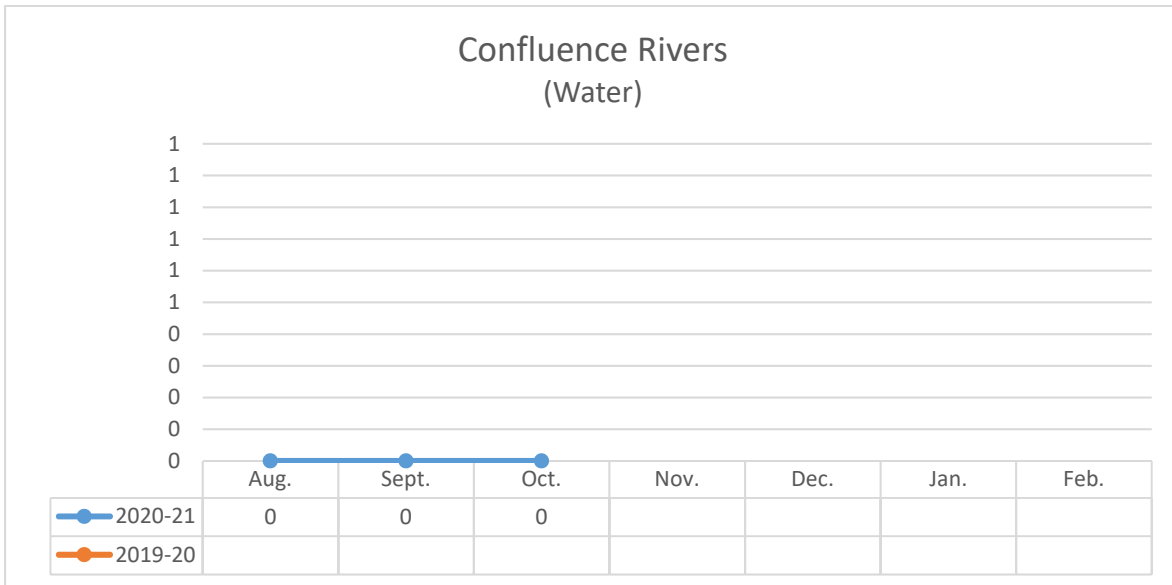
As shown in the previous graph, Confluence Rivers performed no disconnections in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 24 disconnections was performed.

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”



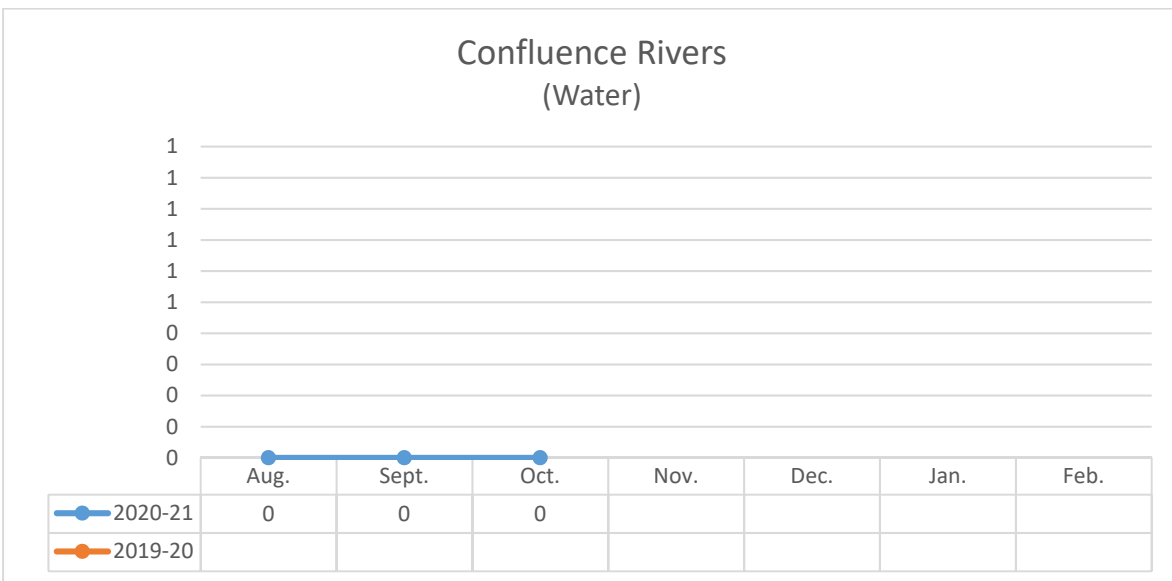
The previous data indicates there were about 9% fewer Confluence Rivers customers with past-due accounts in October 2020 versus September 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 37 customers with “past-due” accounts during this time 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

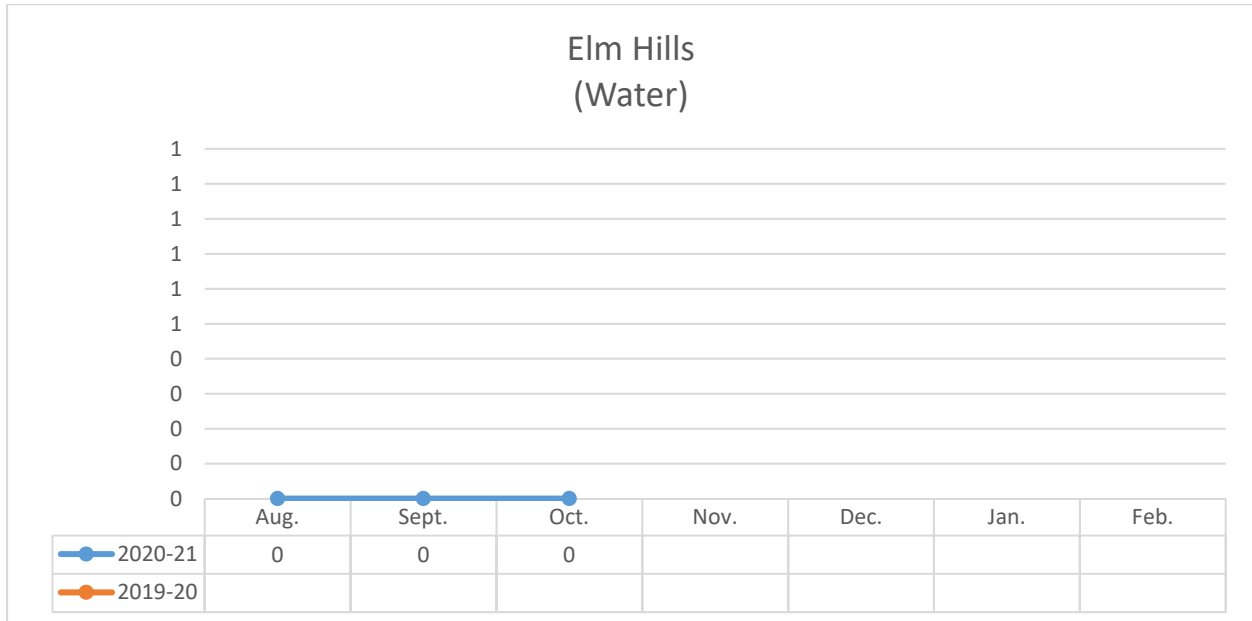


The previous graph illustrates that there were no Confluence Rivers customers who participated in payment plans in October 2020. The Company indicated that it will begin offering payment plans

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.

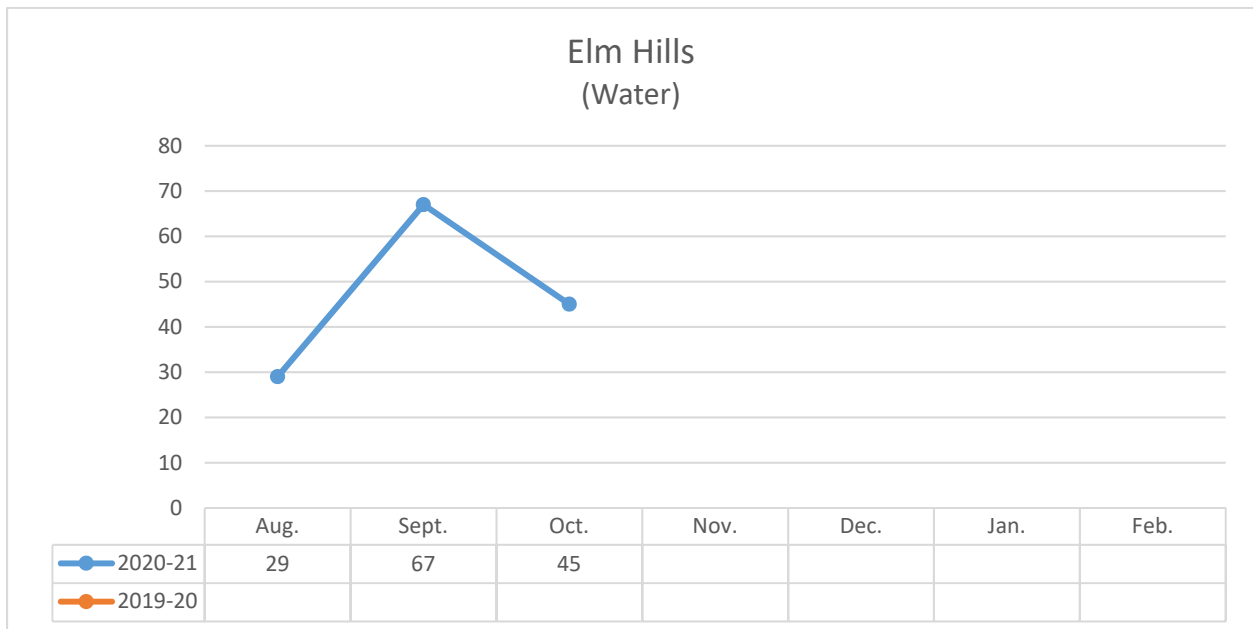
Questions 1 & 3 (Elm Hills - Water)

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



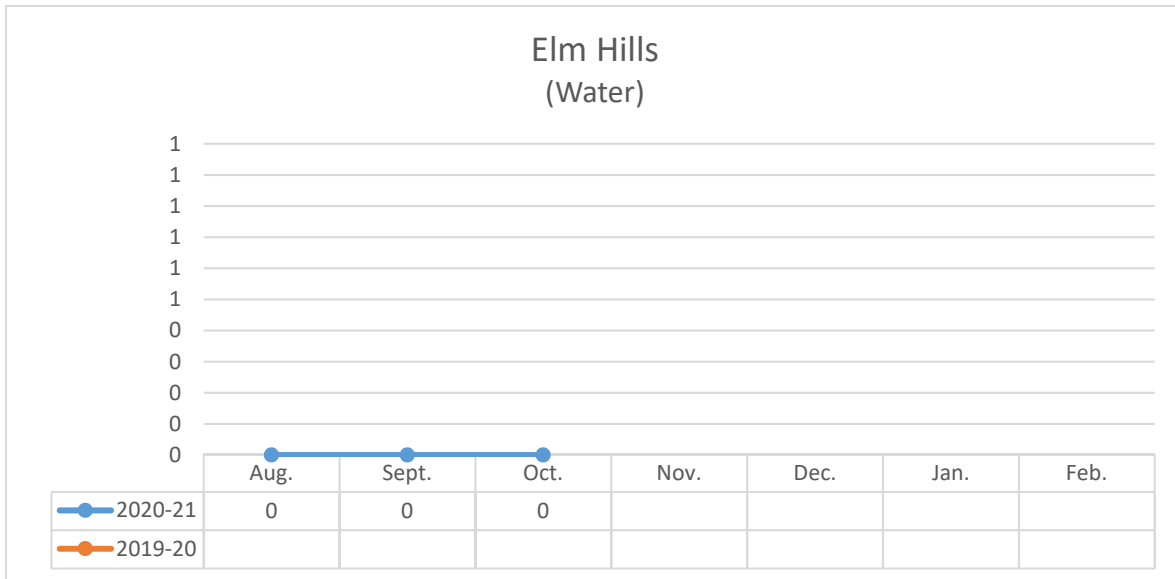
As shown in the previous graph, Elm Hills performed no disconnections in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although no disconnections were performed during this time period.

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”



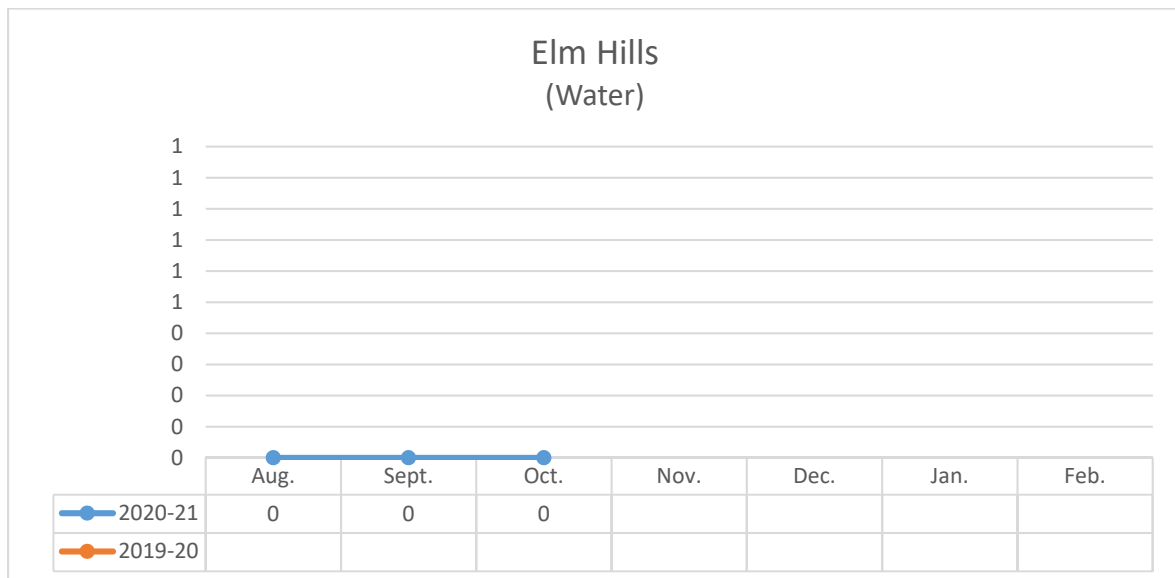
The previous data indicates there were about 33% fewer Elm Hills customers with past-due accounts in October 2020 versus September 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 1 customer with a “past-due” account during this time period. 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

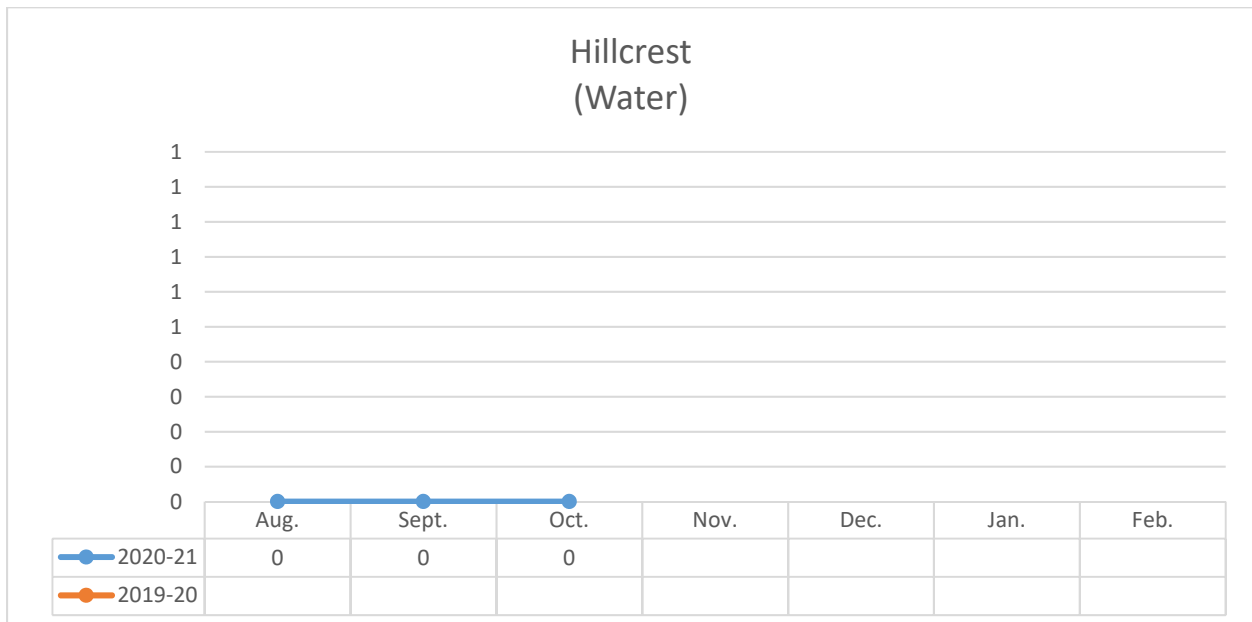


The previous graph illustrates that there were no Elm Hills customers who participated in payment plans in October 2020. The Company indicated that it will begin offering payment plans in

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.

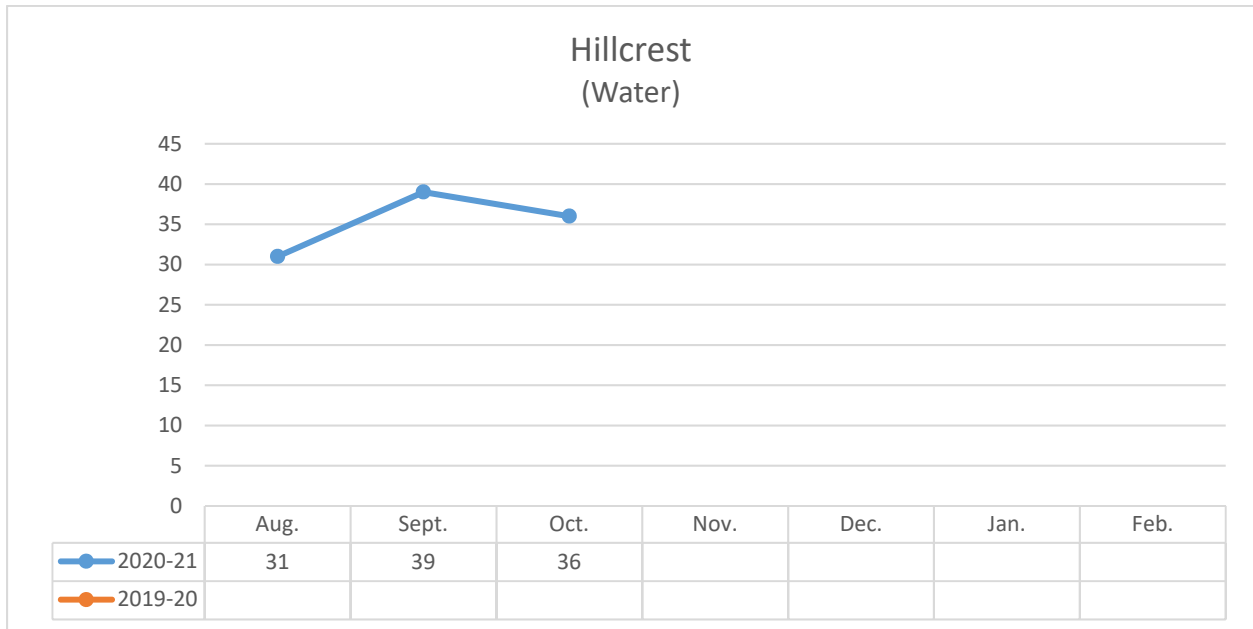
Questions 1 & 3 (Hillcrest - Water)

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



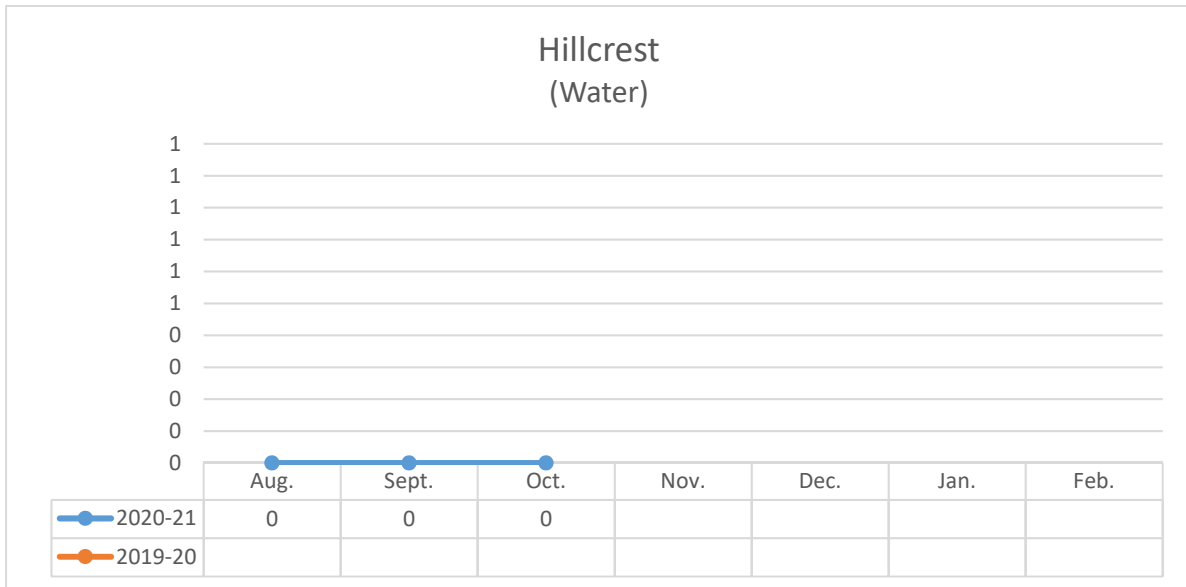
As shown in the previous graph, Hillcrest performed no disconnections in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 12 disconnections was performed during this time period.

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”



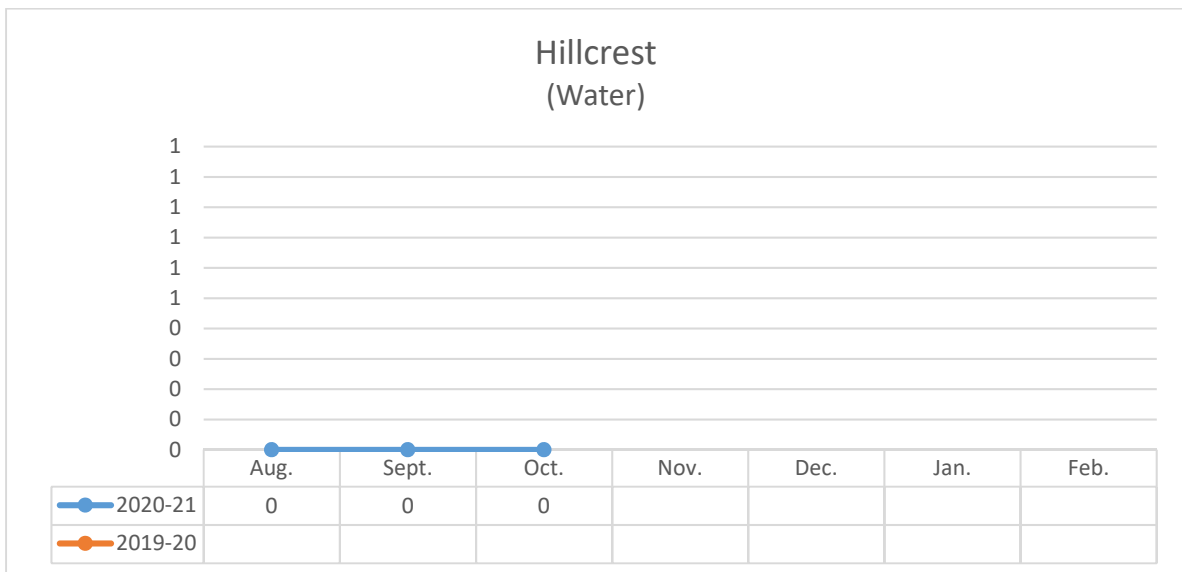
The previous data indicates there were about 8% fewer Hillcrest customers with past-due accounts in October 2020 versus September 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 16 customers with “past-due” accounts during this time period. 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

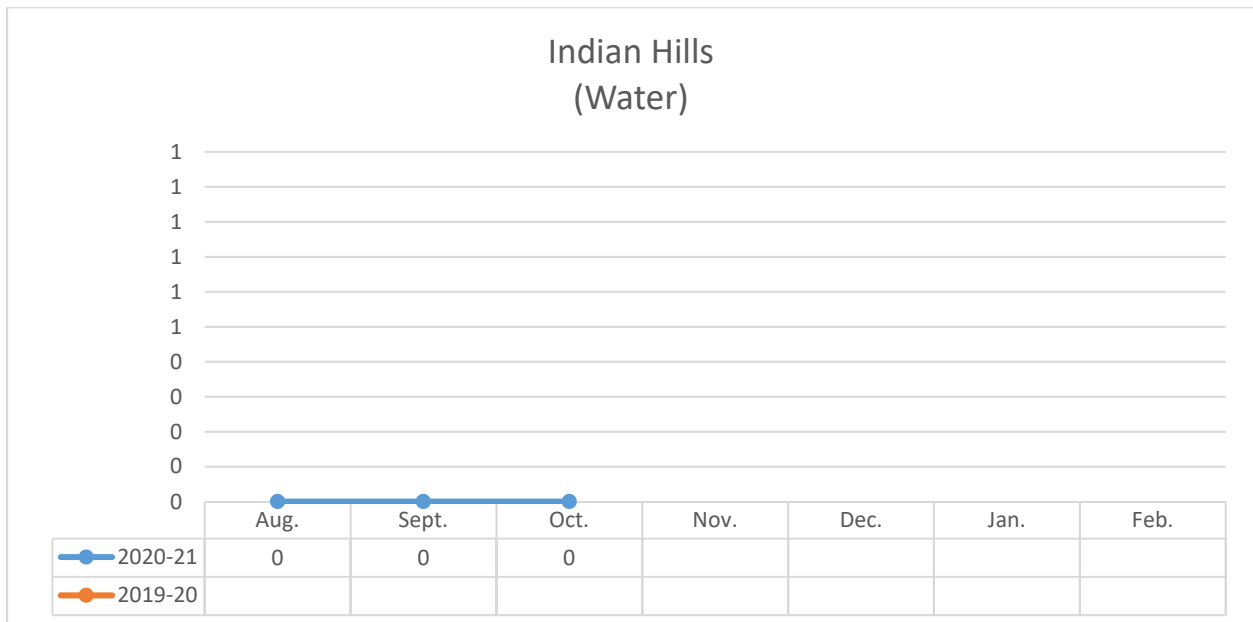


The previous graph illustrates that there were no Hillcrest customers who participated in payment plans in October 2020. The Company indicated that it will begin offering payment plans in

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.

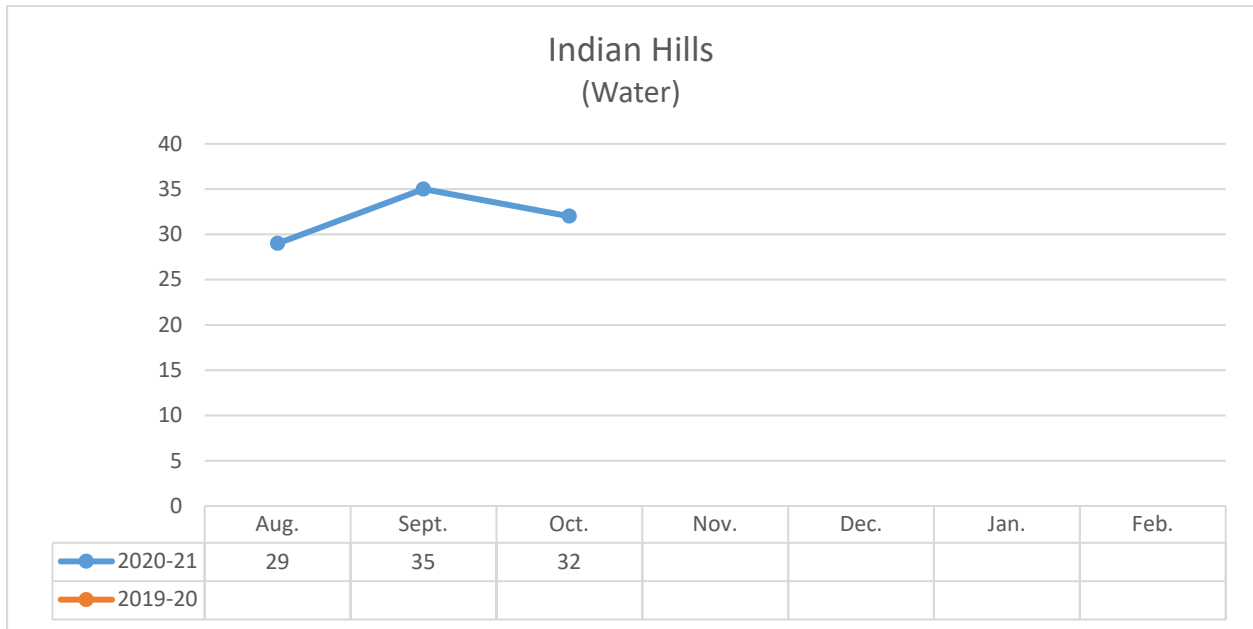
Questions 1 & 3 (Indian Hills - Water)

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



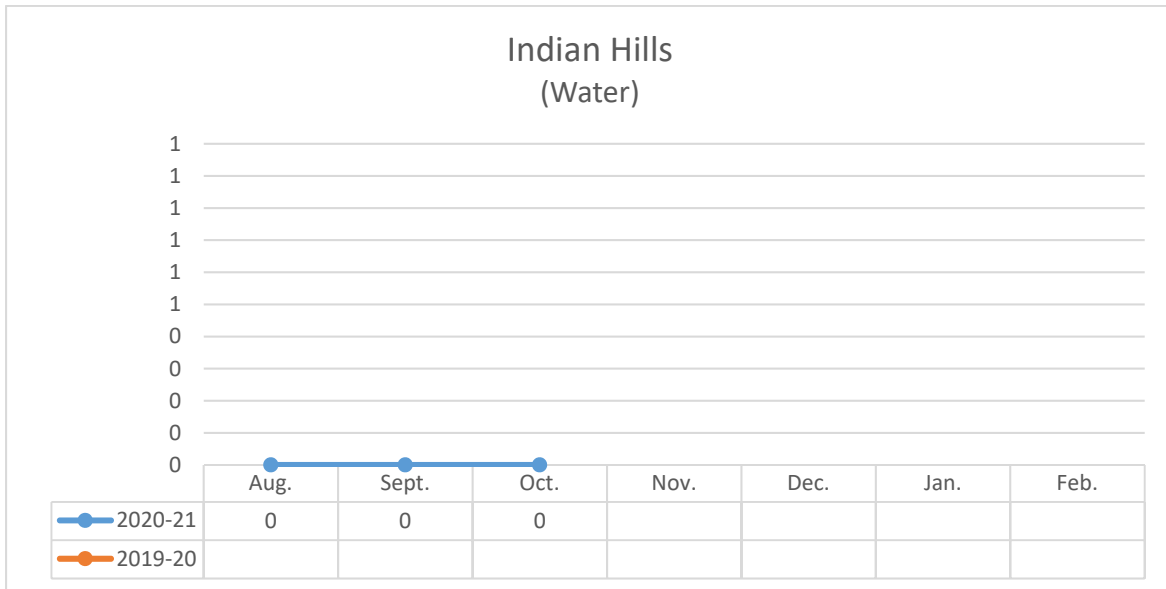
As shown in the previous graph, Indian Hills performed no disconnections in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 6 disconnections was performed during this time period.

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”



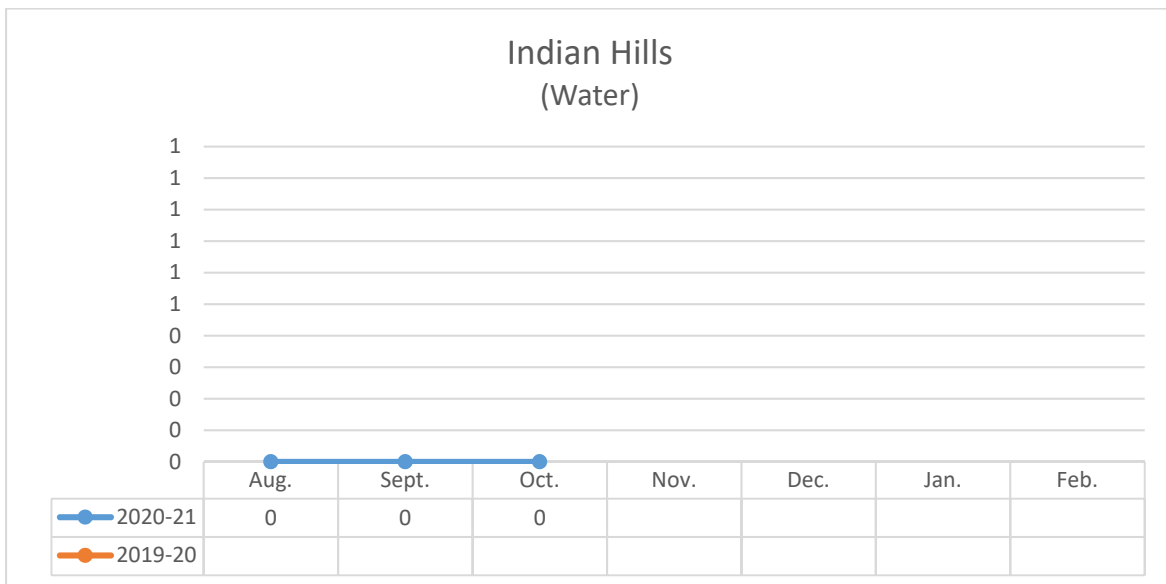
The previous data indicates there were about 9% fewer Indian Hills customers with past-due accounts in October 2020 versus September 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 11 customers with “past-due” accounts during this time period. 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

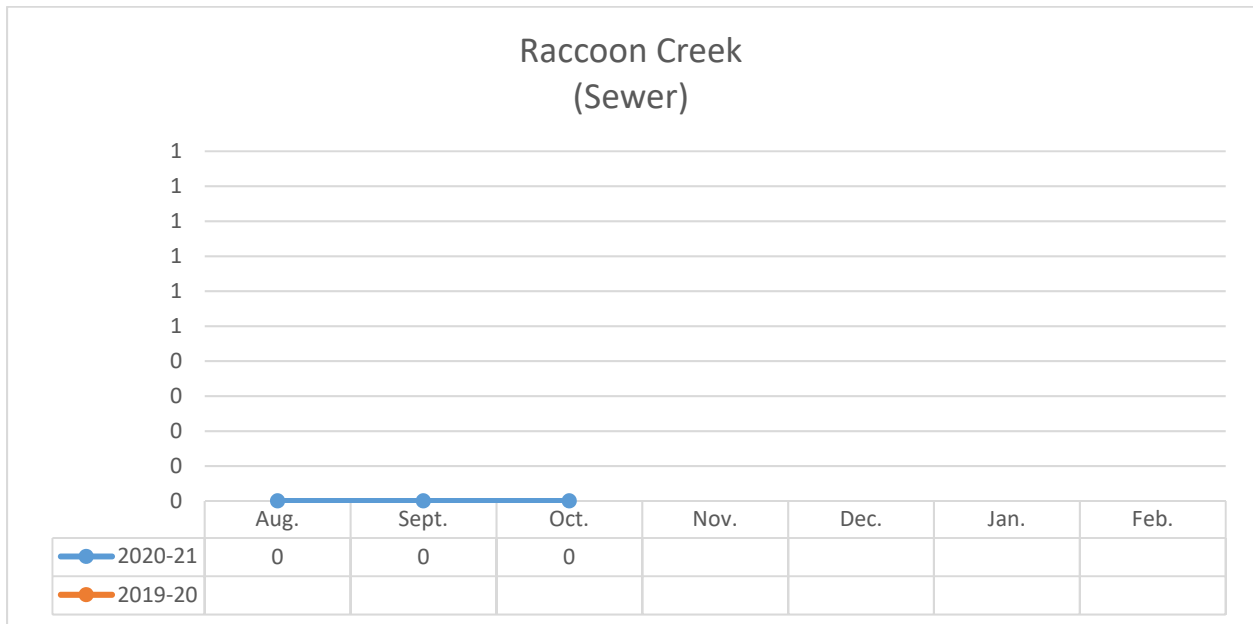


The previous graph illustrates that there were no Indian Hills customers who participated in payment plans in October 2020. The Company indicated that it will begin offering payment plans

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.

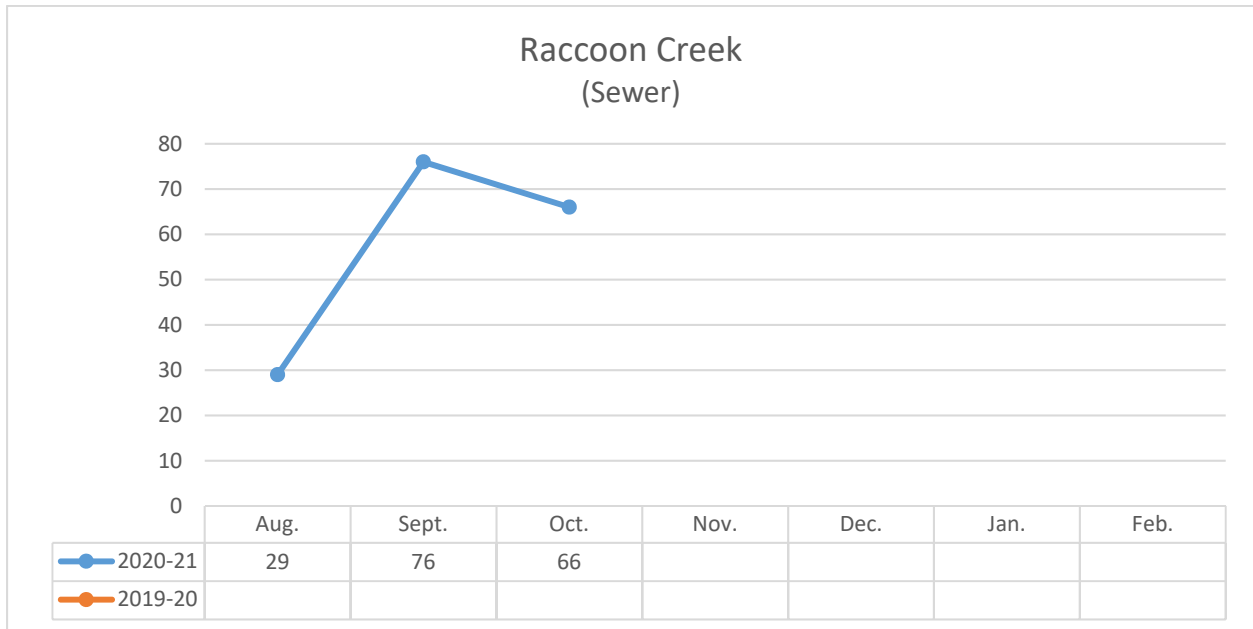
Questions 1 & 3 (Raccoon Creek - Sewer)

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



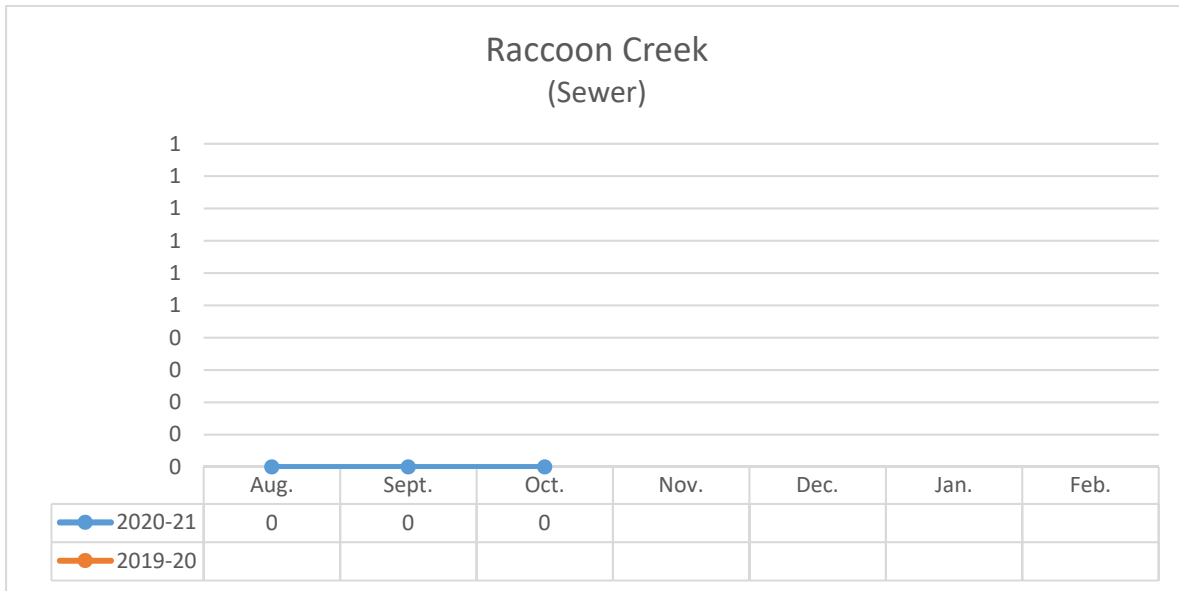
As shown in the previous graph, Raccoon Creek performed no disconnections in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although a total of one (1) disconnection was performed during this time period.

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”



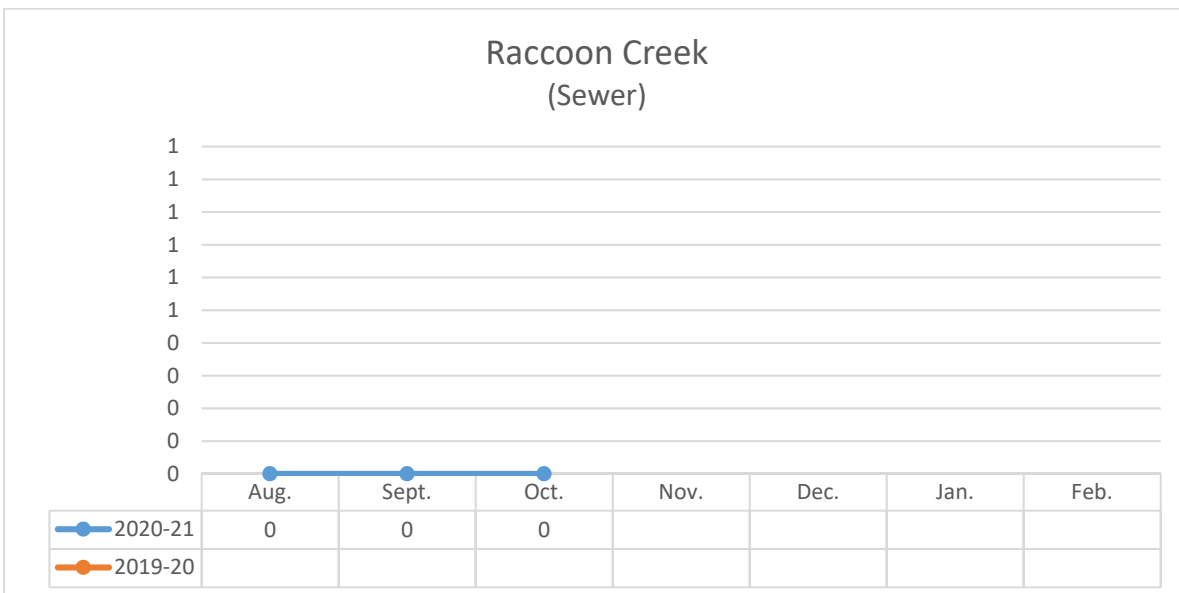
The previous data indicates there were about 13% fewer Raccoon Creek customers with past-due accounts in October 2020 versus September 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 3 customers with “past-due” accounts during this time 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	0	0

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 Metro reduced its estimate for disconnections for non-payment for the months of January 2021 and February 2021 from 100 to 0 in its November 2020 data request response.

Evergy West (Electric)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
2,200	2,200	440	60	0	0

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. Evergy West reduced its estimate for disconnections for non-payment for the months of January 2021 and February 2021 from 60 to 0 in its November 2020 data request response.

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 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.