

**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 Data Requests (“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*, 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. When Staff originally issued its DRs in this docket, Staff requested that the utilities provide estimates of the number of disconnections for non-payment of service for the six-month period of September 2020 through February 2021.

4. Staff filed supplemental DRs in this docket on March 26, 2021. The supplemental DRs requested that utilities provide estimates of the number of

disconnections for non-payment of service for the six-month period of March through August 2021.<sup>1</sup>

5. Staff also supplemented its DRs to request that utilities provide monthly information from March 2020 to continue to compare disconnect data from a yearly perspective.<sup>2</sup>

6. In its *Order Extending Direction to Staff to Gather Information About Utility Disconnections* (“Order”), issued August 11, 2021, the Commission directed Staff to continue filing these reports through February 2022, or until further order of the Commission.

7. Staff filed additional DRs on August 26, 2021, requesting that utilities provide estimates of the number of disconnections for non-payment of services for the six month period of September 2021 through February 2022.

8. Per the Commission’s August 11, 2021 Order, starting with the September 2021 report Staff added a baseline showing the monthly average values prior to the pandemic to show how much the current numbers deviate from the pre-pandemic norm.

9. On March 30, 2022, the Commission issued its *Order Extending Direction to Staff to Gather and Report Information About Utility Disconnections* in which the Commission directed Staff to continue filing reports. This current report, which covers the months of March, April, May, and June 2022, is due by July 31, 2022. The subsequent report which covers the months of July, August, and September 2022, is due by

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<sup>1</sup> In its *Staff Report on Utility Data Request Responses and Notice of Update to Staff Data Requests* filed March 22, 2021, Staff gave notice to the Commission that it would update its Data Requests in this docket.

<sup>2</sup> Id.

October 31, 2022. The remaining 2022 report which covers the months of October, November, and December 2022, is due to the Commission by January 31, 2023.

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

Respectfully Submitted,

**/s/ Ron Irving**

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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 27<sup>th</sup> day of July, 2022.

**/s/ Ron Irving**

# 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**

**July 27, 2022**

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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 15<sup>th</sup> day of each following month.<sup>1</sup>

In response to the Order,<sup>2</sup> 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 through February 2021, with an explanation of the methodology and assumptions used to develop these projections. 3) Please provide the

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

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

same information requested in 1)(a) through 1)(d) applicable to your Company's August 2019 through February 2020 billing cycles.

In a subsequent December 2, 2020, Order, the Commission directed the Staff to continue filing monthly report updates until further notice. On July 22, 2021, Staff filed its monthly report and also requested that the Commission issue an order setting a timeline for the filing of further reports in this matter. On August 11, 2021, the Commission issued its "Order Extending Direction to Staff to Gather Information about Utility Disconnections" extending the reports be filed through February 2022. On March 30, 2022, the Commission ordered Staff to continue to file the reports requiring them to be filed quarterly, with the first report due no later than July 31, 2022. Staff has compiled the requested information for its reports by sending data requests to the various utilities. On April 8, 2022, Staff requested information for Question 1) and Question 2) to be updated from March 2022 through December 2022. On April 11, 2022, Staff filed a motion asking the Commission to issue an order directing the utilities to file updated responses to Staff's data requests by the 15<sup>th</sup> of every month from March 2022 through December 2022. On April 22, 2022, the Commission issued its "Order Directing Utilities to Respond to Staff Data Requests". Because the information available and reviewed in this report begins in March of 2020, the pre-pandemic comparison that was previously included is no longer applicable and not included in the report.

For purposes of this updated report, the following utilities responded to this Staff data request with month-end March, April, May, and June 2022 data and the updated data requests, and their responses are included in this report: Ameren Missouri ("Ameren Missouri – Electric"), Ameren Missouri ("Ameren Missouri – Gas")<sup>3</sup>, Evergy Missouri Metro, Inc. ("Evergy Metro –

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<sup>3</sup> Ameren Missouri – Electric and Ameren Missouri - Gas submitted February data after the filing of the previous report. The February information in addition to March, April, May and June are included in this report for Ameren Missouri.



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”), The Raytown Water Company (“Raytown Water”) and Confluence Rivers Utility Operating Company, Inc. (“Confluence Rivers”).

On October 14, 2021, in Case Number WM-2021-0412 the Commission approved the merger of Confluence Rivers Utility Operating Company, Inc.; Hillcrest Utility Operating Company, Inc.; Elm Hills Utility Operating Company, Inc.; Osage Utility Operating Company, Inc.; Raccoon Creek Utility Operating Company, Inc.; and Indian Hills Utility Operating Company, Inc. Confluence Rivers Utility Operating Company, Inc. will be the surviving corporation. The Order became effective November 13, 2021. Staff has compared data for Confluence Rivers starting January 2022.

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

The information reported below for Question 1 is presented for the period August 2019 through July 2020 (grey dots and line), for the period of August 2020 through July 2021 (orange dots and line) August 2021 through December 2021 (blue dots and line) and January 2022 through June 2022 (yellow dots and line). As this report is updated in the future, the yellow dots and line will extend through future months. This method of presentation will allow for a direct comparison of the reported information from August 2019 to June 2022 with the same month for each year. Also, the report will specify the most recent month-to-month percentage

change for each category of information (e.g., number of disconnections in June 2022 compared to May 2022).

### **Summary of Responses to Question 1**

For question 1a, all but three utilities reported increases in the number of customer disconnections in the 2<sup>nd</sup> quarter of 2022 compared to the 2<sup>nd</sup> quarter of 2021. All but one utility reported an increase in customer disconnections for the 2<sup>nd</sup> quarter of 2022 as compared to the previous quarter of 2022. The increase in disconnections for the 2<sup>nd</sup> quarter is most likely due to the cold weather rule being in effect for portions of the 1<sup>st</sup> quarter of 2022.

For Question 1b, all of the utilities reported increases in the number of past-due customer accounts in the 2<sup>nd</sup> quarter of 2022 compared to the 2<sup>nd</sup> quarter of 2021.

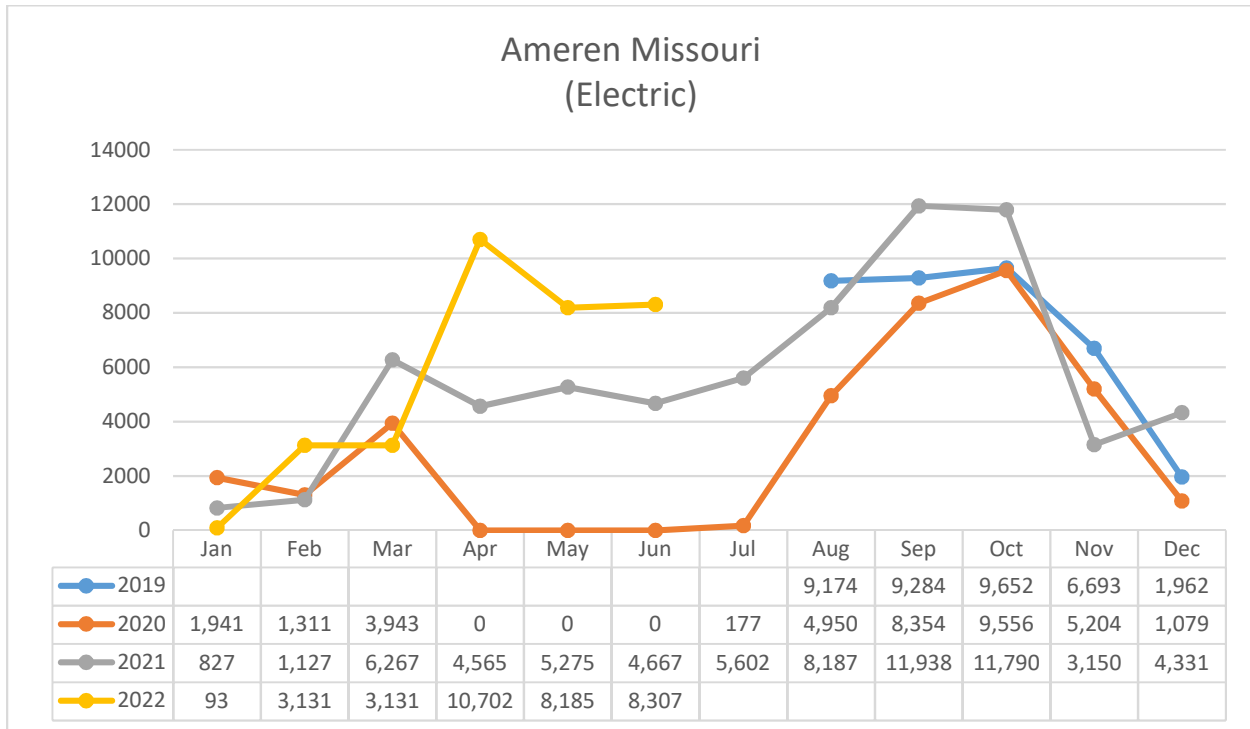
For Question 1c, all utilities but one, reported increases in the 2<sup>nd</sup> quarter of 2022 compared to the 2<sup>nd</sup> quarter of 2021, with two of the utilities reporting the highest quarterly number of customers who have received final disconnection notices but have not yet been disconnected since this reporting began. In addition, a little more than half of the utilities reported increases in this metric in the 2<sup>nd</sup> quarter of 2022 compared to the previous quarter.

Regarding Question 1d, about the same number of utilities reported increases or decreases in the number of customers participating in payment plans in the 2<sup>nd</sup> quarter of 2022 compared to the 1<sup>st</sup> quarter of 2022 and the 2<sup>nd</sup> quarter of 2021. However, most of the utilities reported an increase in the number of customers participating in payment plans compared to the 2<sup>nd</sup> quarter of 2020.

**Individual Utility Responses:**

**Question 1 (Ameren Missouri – Electric)<sup>4</sup>**

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

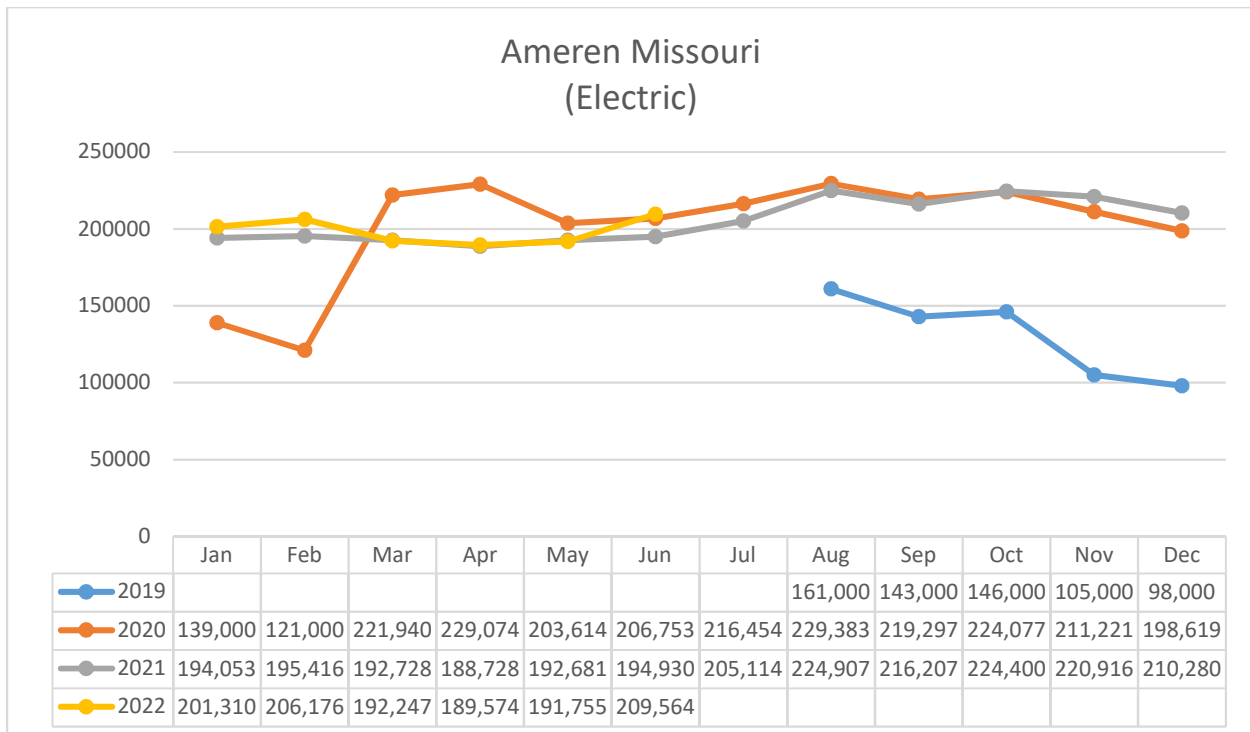


As shown in the previous graph, Ameren Missouri had 178% more disconnections for non-payment in February 2022 versus February 2021, 50% fewer in March 2022 versus March 2021, 134% more in April 2022 versus April 2021, 55% more in May 2022 versus May 2021, and 78% more in June 2022 versus June 2021. There were about 3267% more disconnections for non-payment in February 2022 compared to January 2022, the same number in March 2022 compared to February 2022, 242% more in April 2022 compared to March 2022, 24% fewer in May 2022 compared to April 2022, and 1% more in June 2022 compared to May 2022. The number of actual disconnections by Ameren Missouri in February 2022 was approximately 4% above the amount projected by Ameren Missouri for the same month. Due to timing issues and some discrepancies in reporting, Ameren Missouri did not provide projected

<sup>4</sup> Per Data Request Response No. 0004.1s8 from Ameren, the numbers contained in previous data request responses were updated. Remote disconnects were enabled and are now being captured in the data. The data was updated in October and the numbers will be accurate moving forward.

estimations until June 2022. The number of actual disconnections by Ameren Missouri in June 2022 was approximately 14% above the amount projected by Ameren Missouri for the same month. There were 138% more disconnections for non-payment in February 2022 versus pre-pandemic, February 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”<sup>5</sup>**

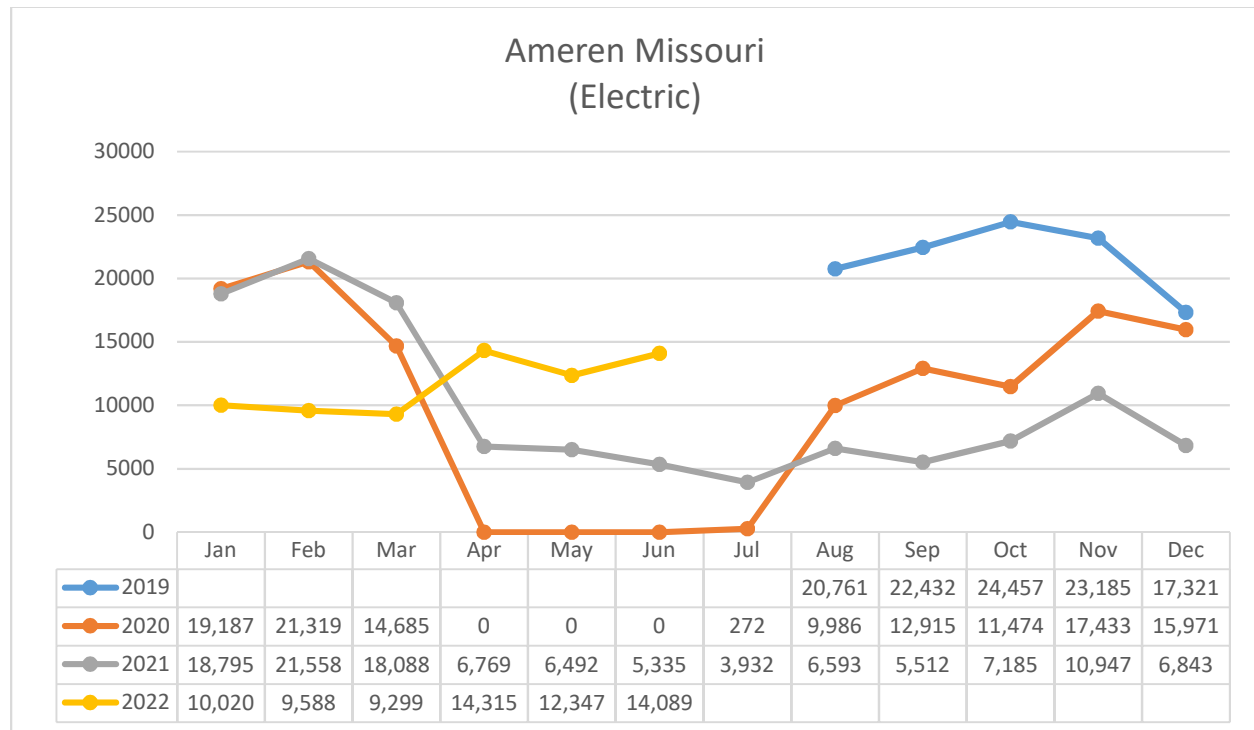


The previous data indicates that there were approximately 6% more Ameren Missouri customers with past-due accounts in February 2022 versus February 2021, 1% fewer in March 2022 versus March 2021, 1% more in April 2022 versus April 2021, less than 1% fewer in May 2022 versus May 2021, and 8% more in June 2022 versus June 2021. There were 2% more customers with past-due accounts in February 2022 compared to January 2022, 7% fewer in March 2022 compared to February 2022, 1% fewer in April 2022 versus March 2022, 1% more in May 2022 compared to April 2022, and 9% more in June 2022 compared to May 2022. There were 70% more customers

<sup>5</sup> Per Data Request Response No. 0004.1s10 from Ameren, the numbers contained in previous data request responses were updated. An adjustment was made in data point (1b) due to certain regional areas were excluded for some months. May through November numbers were updated. The numbers were reviewed for accuracy and should be accurate moving forward.

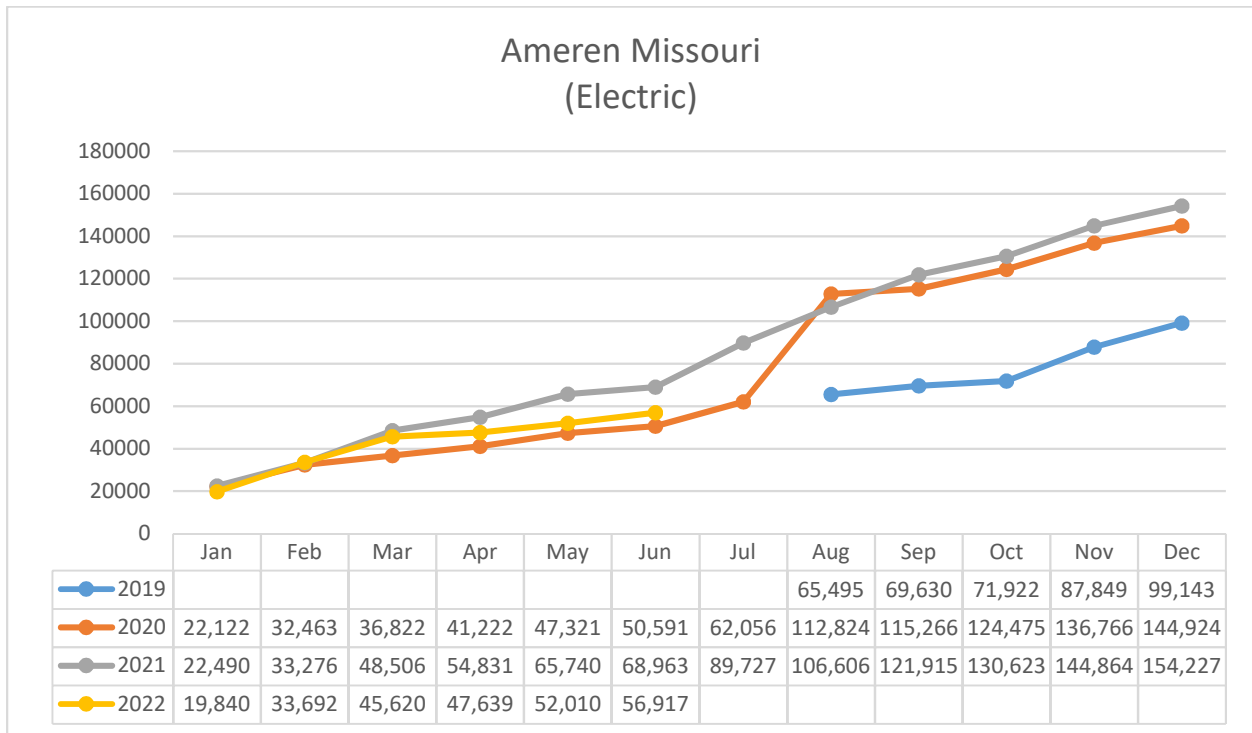
with past-due accounts in February 2022 versus pre-pandemic, February 2020. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

**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 56% fewer customers who were not disconnected in February 2022 versus February 2021, 49% fewer in March 2022 versus March 2021, 111% more in April 2022 versus April 2021, 90% more in May 2022 versus May 2021, and 164% more in June 2022 versus June 2021. There were approximately 4% fewer customers who received a final disconnection notice in February 2022 compared to January 2022, 3% fewer in March 2022 compared to February 2022, 54% more in April 2022 compared to March 2022, 14% fewer in May 2022 compared to April 2022, and 14% more in June 2022 compared to May 2022. There were 55% fewer customers who received a final disconnection notice, but have not been disconnected for non-payment in February 2022 versus pre-pandemic, February 2020.

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

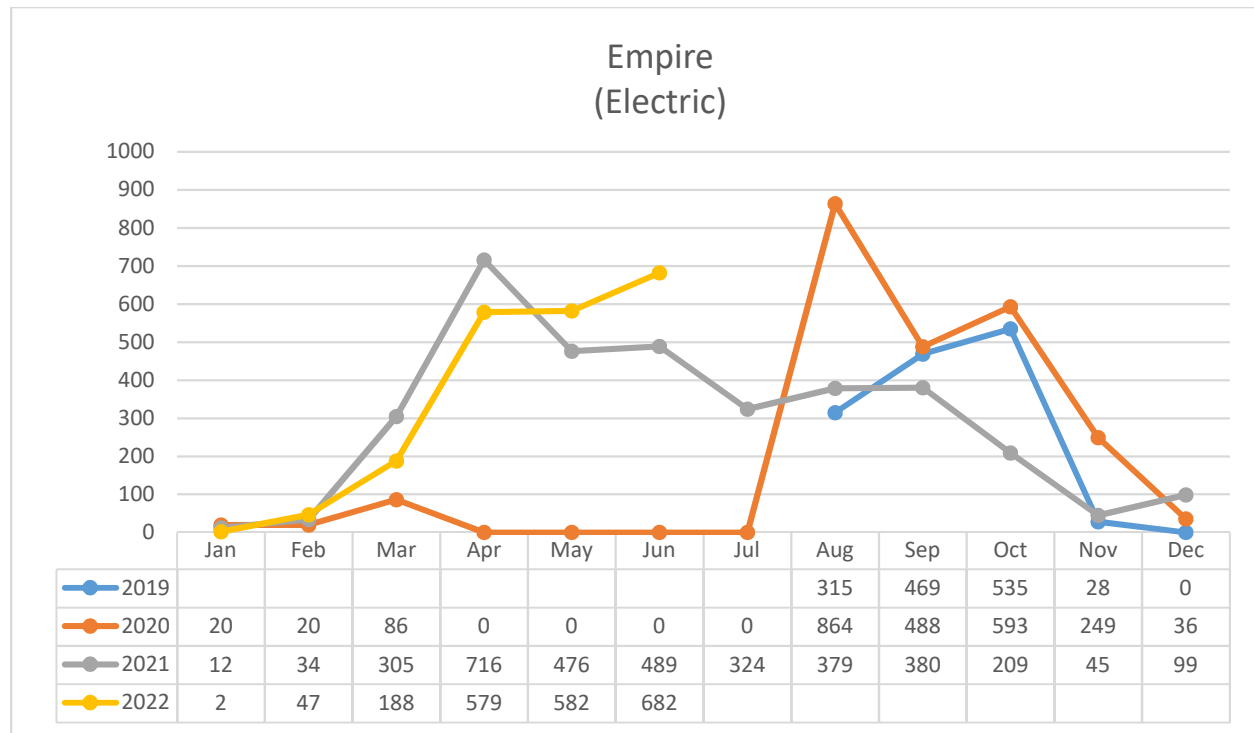


The previous graph illustrates that there were approximately 1% more Ameren Missouri customers who participated in payment plans in February 2022 versus February 2021, 6% fewer in March 2022 versus March 2021, 13% fewer in April 2022 versus April 2021, 21% fewer in May 2022 versus May 2021, and 17% fewer in June 2022 versus June 2021. There was 70% more customers who participated in payment plans in February 2022 compared to January 2022, 35% more in March 2022 compared to February 2022, 4% more in April 2022 compared to March 2022, 9% more in May 2022 compared to April 2022, and 9% more in June 2022 compared to May 2022.

There were approximately 4% more customers who participated in payment plans in February 2022 versus pre-pandemic, February 2020.

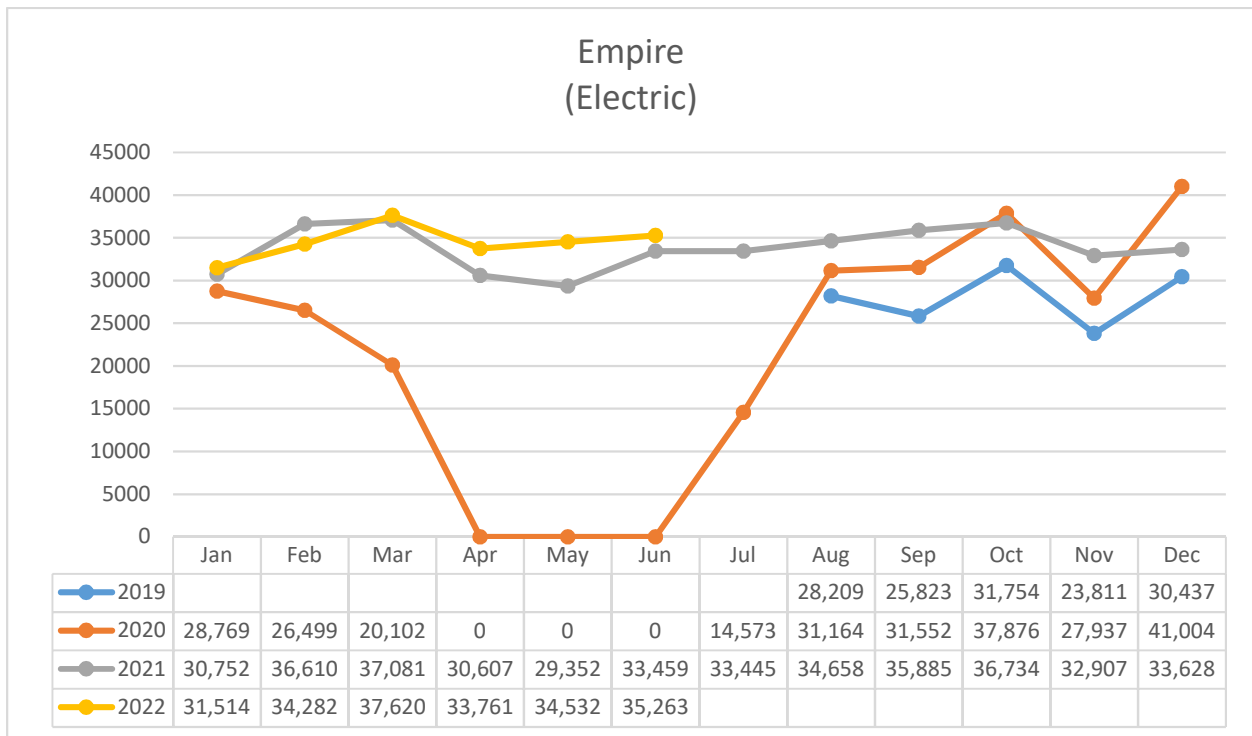
**Question 1 (Empire – Electric)**

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



As shown in the previous graph, Empire performed approximately 38% fewer disconnections for non-payment in March 2022 versus March 2021, 19% fewer in April 2022 versus April 2021, 22% more in May 2022 versus May 2021, and 39% more in June 2022 versus June 2021. There were about 300% more disconnections for non-payment in March 2022 compared to February 2022, 208% more in April 2022 compared to March 2022, 1% more in May 2022 compared to April 2022, and 17% more in June 2022 compared to May 2022. Due to the timing of the request for additional information (Question 2 below), Empire did not project disconnections for the month of March. The projected number of disconnections for non-payment in April 2022 was 10% below the number of actual disconnections, 45% above for May 2022, and 64% above for June 2022.

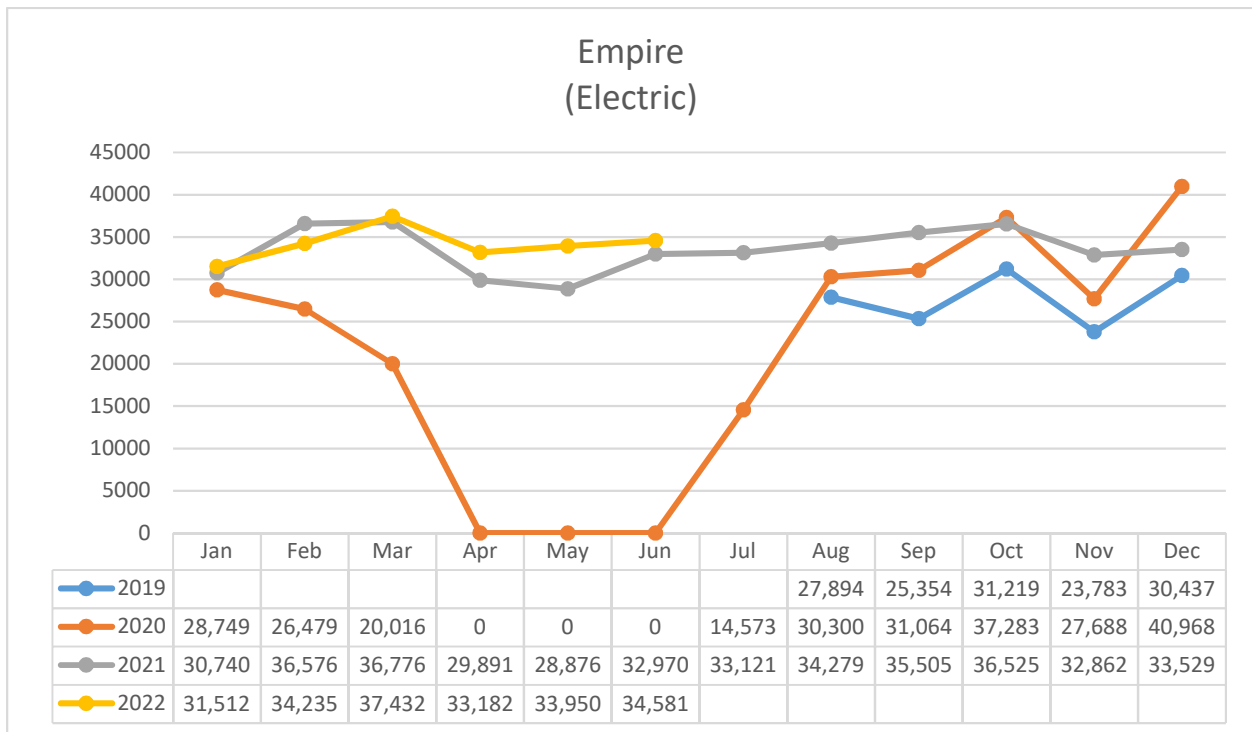
**b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”**



The previous data indicates that there were 1% more Empire customers with past-due accounts in March 2022 versus March 2021, 10% more in April 2022 versus April 2021, 18% more in May 2022 versus May 2021, and 5% more in June 2022 versus June 2021. There were 10% more customers with past-due accounts in March 2022 compared to February 2022, 10% fewer in April 2022 compared to March 2022, 2% more in May 2022 compared to April 2022, and 2% more in June 2022 compared to May 2022. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement due date.

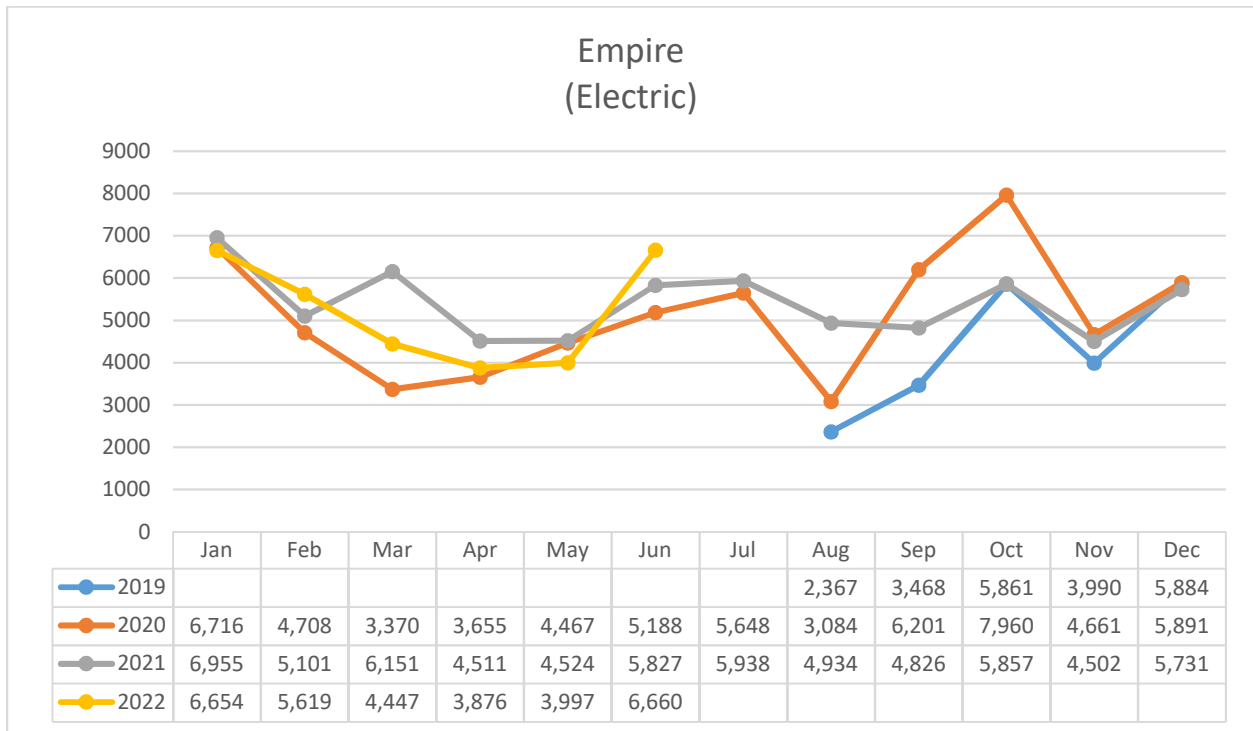


**c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end**



As shown by Empire’s data, for those customers who received a final disconnection notice there were about 2% more customers who were not disconnected in March 2022 versus March 2021, 11% more in April 2022 versus April 2021, 18% more in May 2022 versus May 2021, and 5% more in June 2022 versus June 2021. There were approximately 9% more customers who received a final disconnection notice in March 2022 compared to February 2022, 11% fewer in April 2022 compared to March 2022, 2% more in May 2022 compared to April 2022, and 2% more in June 2022 compared to May 2022.

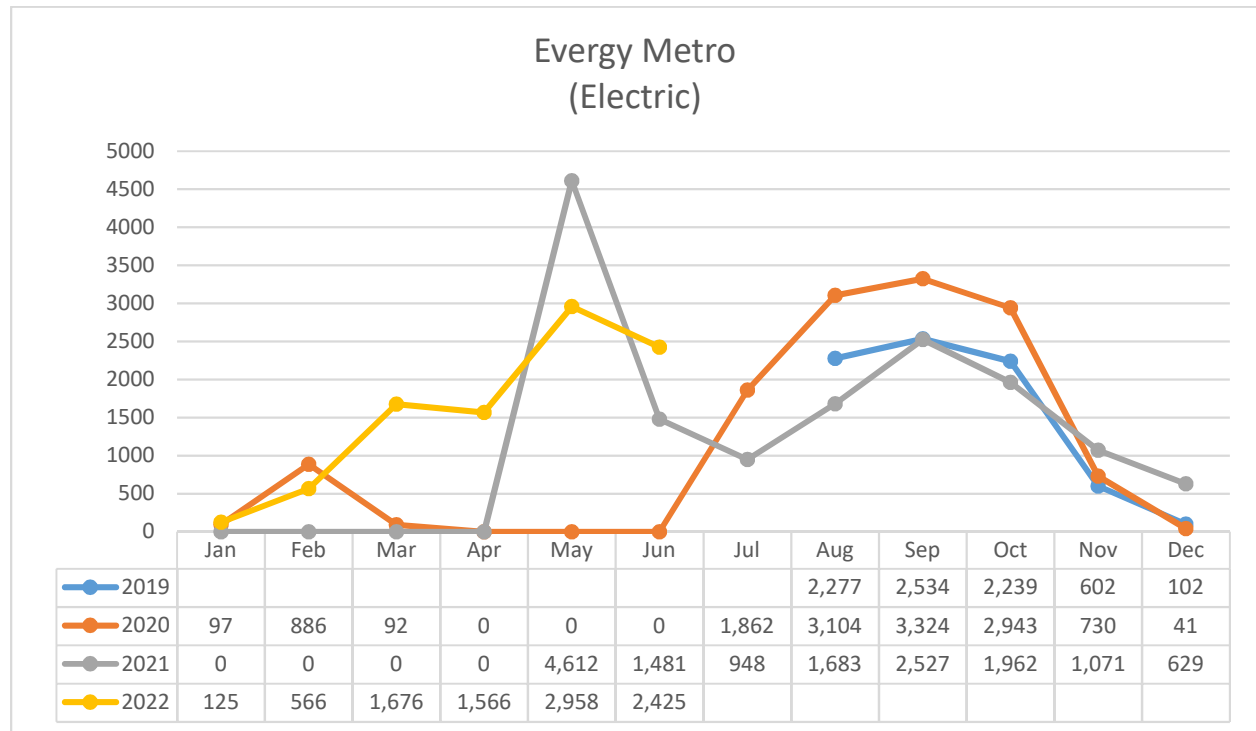
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 28% fewer Empire customers who participated in payment plans in March 2022 versus March 2021, 14% fewer in April 2022 versus April 2021, 12% fewer in May 2022 versus May 2021, and 14% more in June 2022 versus June 2021. There were 21% fewer customers who participated in payment plans in March 2022 compared to February 2022, 13% fewer in April 2022 compared to March 2022, 3% more in May 2022 compared to April 2022, and 67% more in June 2022 compared to May 2022.

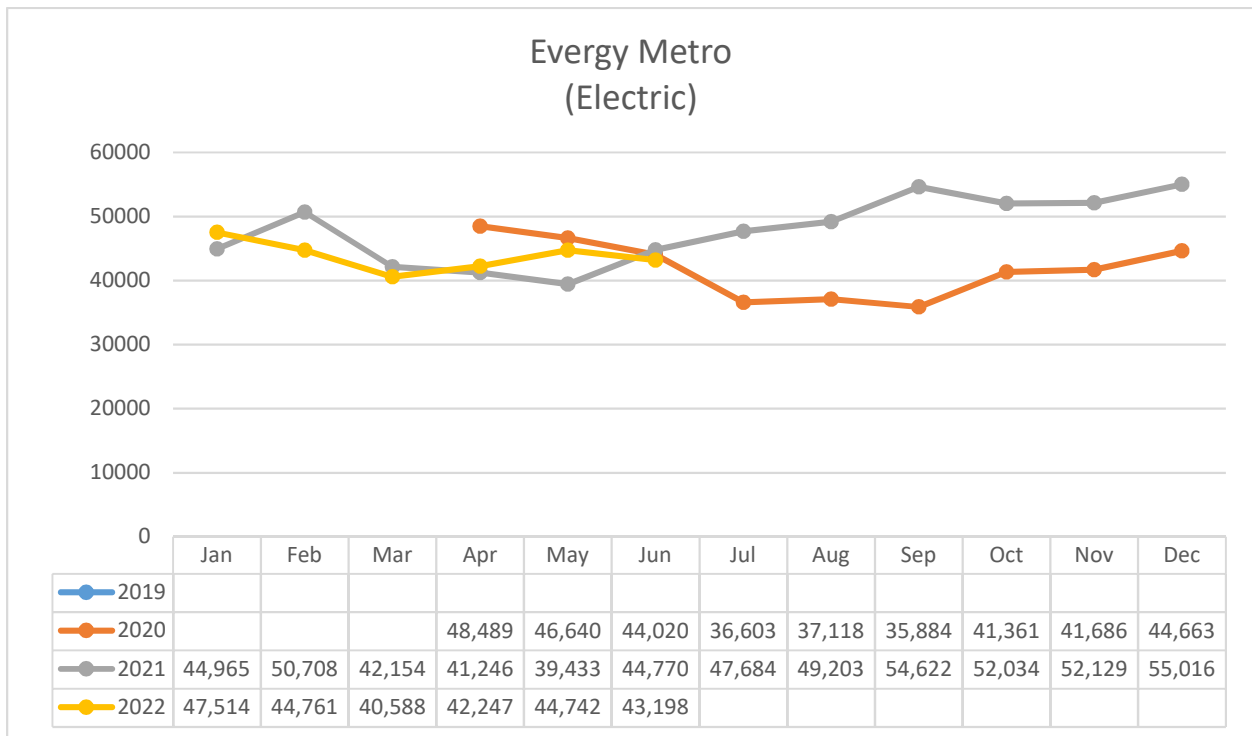
**Question 1 (Everty Metro – Electric)**

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



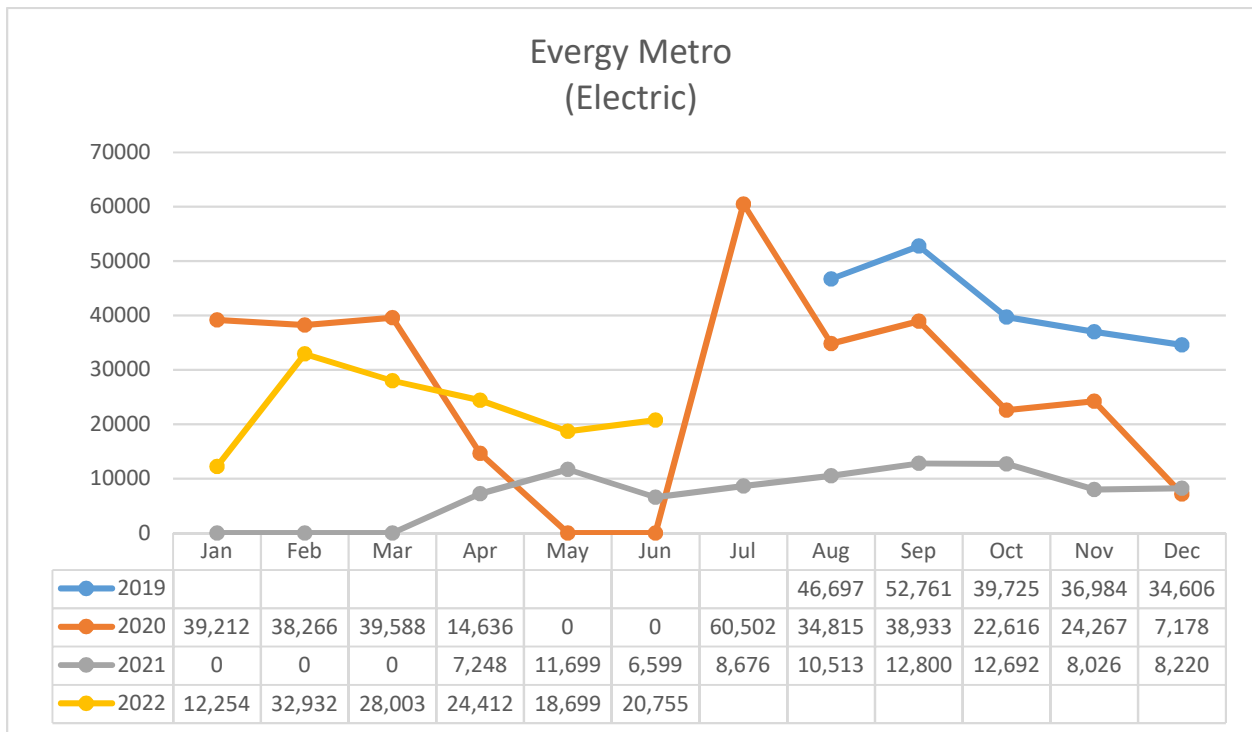
As shown in the previous graph, Everty Metro performed 1676 disconnections for non-payment in March 2022 versus 0 in March 2021, 1566 in April 2022 versus 0 in April 2021, approximately 36% fewer in May 2022 versus May 2021, and 64% more in June 2022 versus June 2021. There were 196% more disconnections for non-payment in March 2022 compared to February 2022, 7% fewer in April 2022 compared to March 2022, 89% more in May 2022 compared to April 2022, and 18% fewer in June 2022 compared to May 2022. The number of actual disconnections by Everty Metro in March 2022 was about 110% above the amount projected by Everty Metro for the same month, 12% more in April, 97% more in May, and 52% more in June.

**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”**



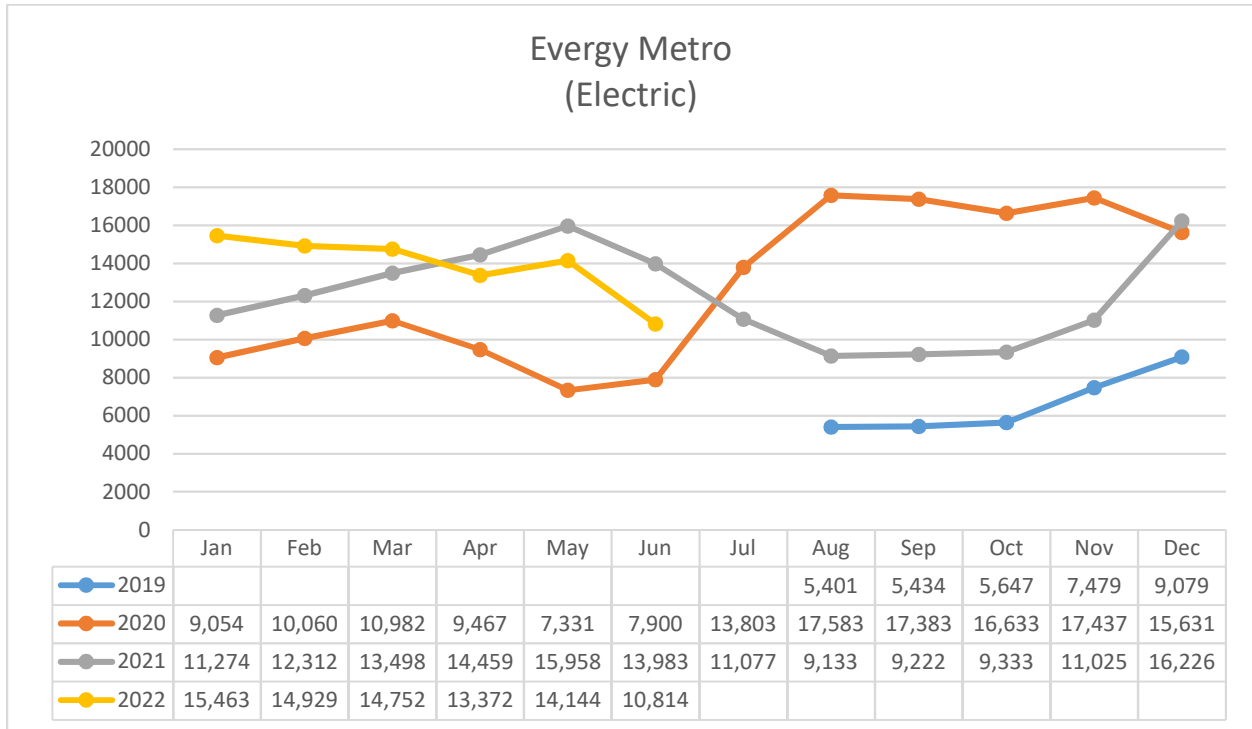
The previous data indicates that there were 4% fewer Evergy Metro customers with past-due accounts in March 2022 versus March 2021, 2% more in April 2022 versus April 2021, 13% more in May 2022 versus May 2021, and 4% fewer in June 2022 versus June 2021. There were 9% fewer customers with past-due accounts in March 2022 compared to February 2022, 4% more in April 2022 compared to March 2022, 6% more in May 2022 compared to April 2022, and 3% fewer in June 2022 compared to May 2022. 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 28,003 customers who were not disconnected in March 2022 versus 0 in March 2021, 237% more in April 2022 versus April 2021, 60% more in May 2022 versus May 2021, and 215% more in June 2022 versus June 2021. There were approximately 15% fewer customers who received a final disconnection notice in March 2022 compared to February 2022, 13% fewer in April 2022 compared to March 2022, 23% fewer in May 2022 compared to April 2022, and 11% more in June 2022 compared to May 2022.

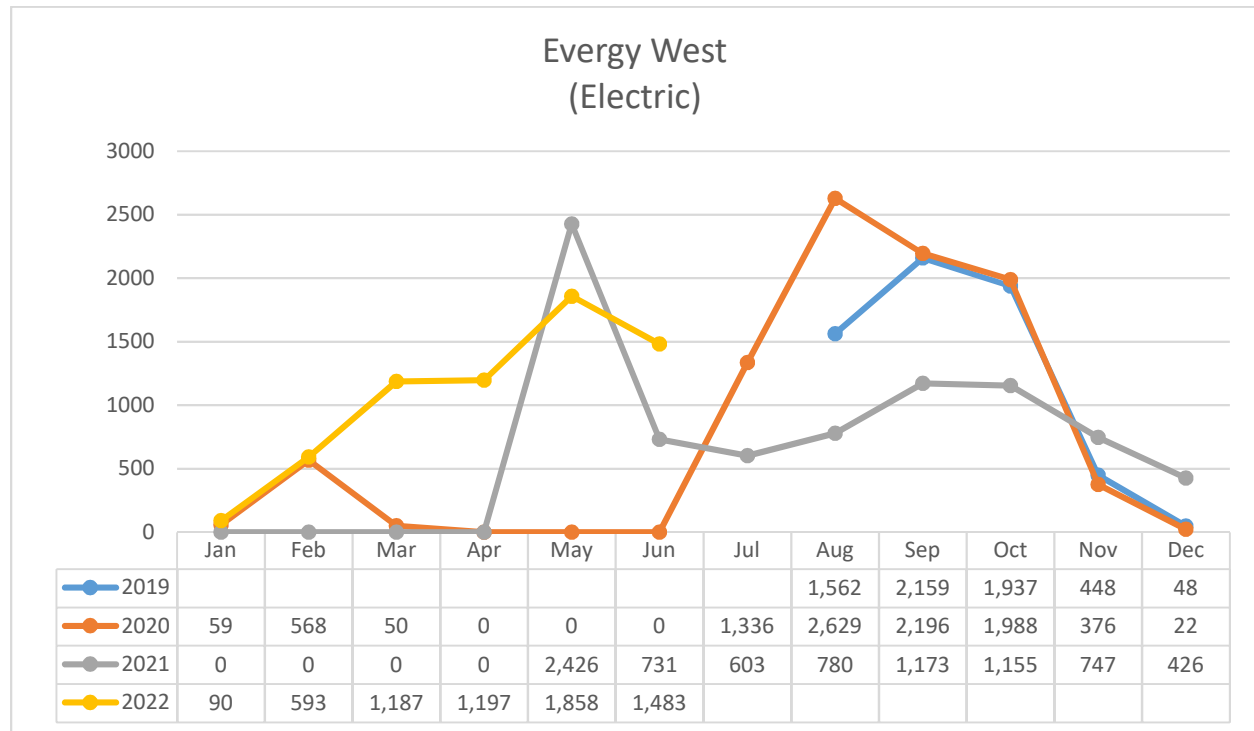
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 9% more Evergy Metro customers who participated in payment plans in March 2022 versus March 2021, 8% fewer in April 2022 versus April 2021, 11% fewer in May 2022 versus May 2021, and 23% fewer in June 2022 versus June 2021. There were approximately 1% fewer customers who participated in payment plans in March 2022 compared to February 2022, 9% fewer in April 2022 compared to March 2022, 6% more in May 2022 compared to April 2022, 24% fewer in June 2022 compared to May 2022.

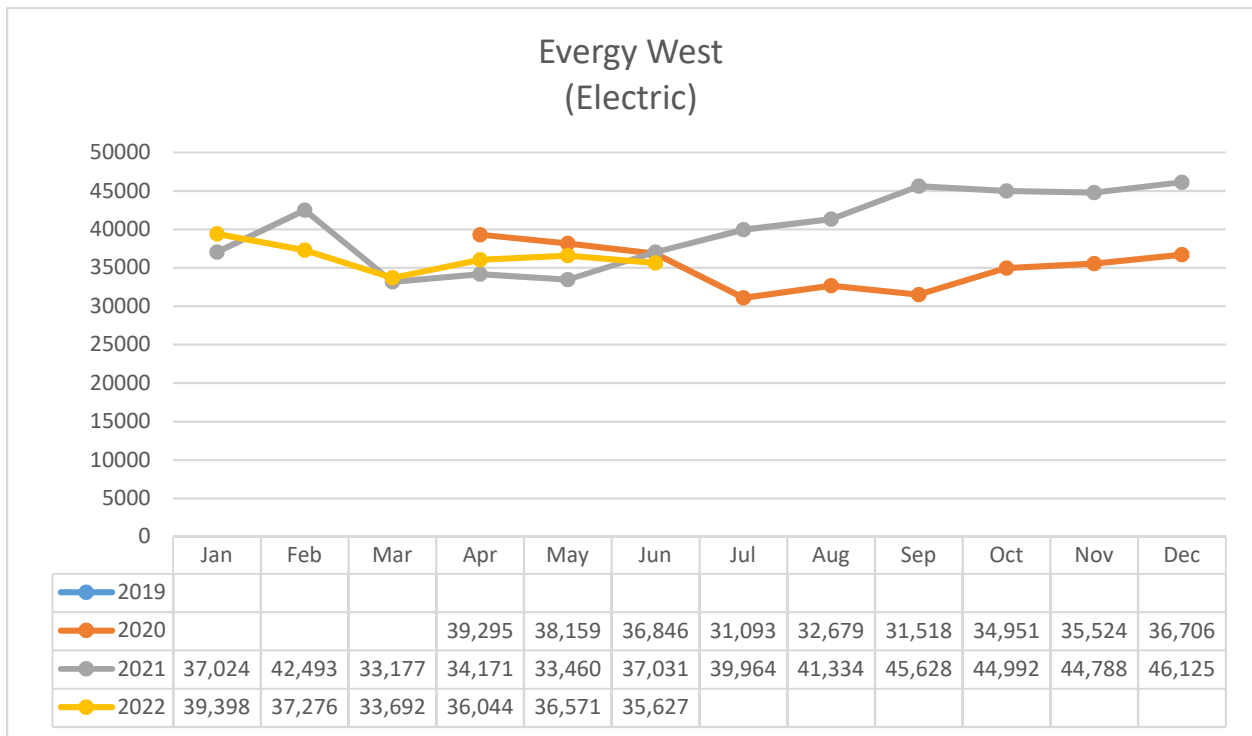
**Question 1 (Evergny West – Electric)**

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



As shown in the previous graph, Evergny West performed 1187 disconnections for non-payment in March 2022 versus 0 in March 2021, 1197 in April 2022 versus 0 in April 2021, 23% fewer in May 2022 versus May 2021, and 103% more in June 2022 versus June 2021. There were approximately 100% more disconnection for non-payment in March 2022 compared to February 2022, 1% more in April 2022 compared to March 2022, 55% more in May 2022 compared to April 2022, and 20% fewer in June 2022 compared to May 2022. The number of actual disconnections by Evergny West in March 2022 was 137% more than the amount projected by Evergny West for the same month, 64% more in April 2022, 86% more in May 2022, and 35% more in June 2022.

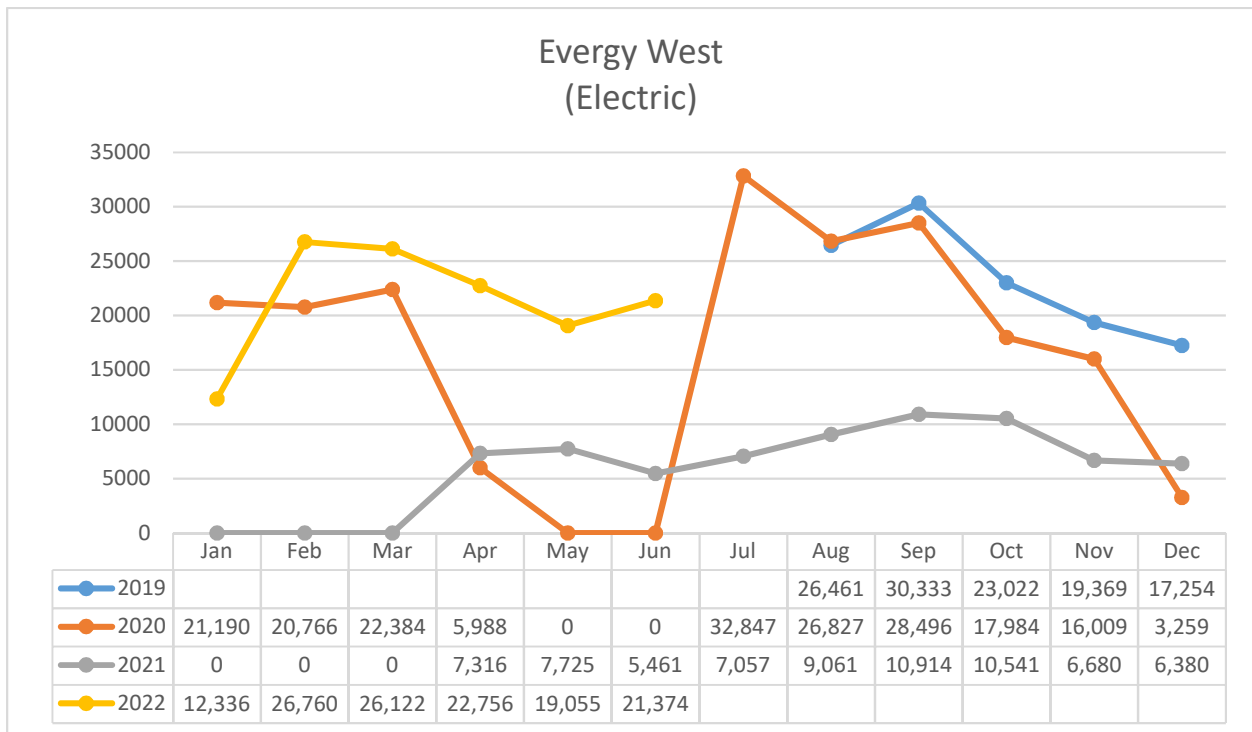
**b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”**



The previous data indicates that there were 2% more Evergy West customers with past-due accounts in March 2022 versus March 2021, 5% more in April 2022 versus April 2021, 9% more in May 2022 versus May 2021, and 4% fewer in June 2022 versus June 2021. There were approximately 10% fewer customers with past-due accounts in March 2022 compared to February 2022, 7% more in April 2022 compared to March 2022, 1% more in May 2022 compared to April 2022, and 3% fewer in June 2022 compared to May 2022. Evergy West defines past-due accounts as accounts that are more than 30 days in arrears.

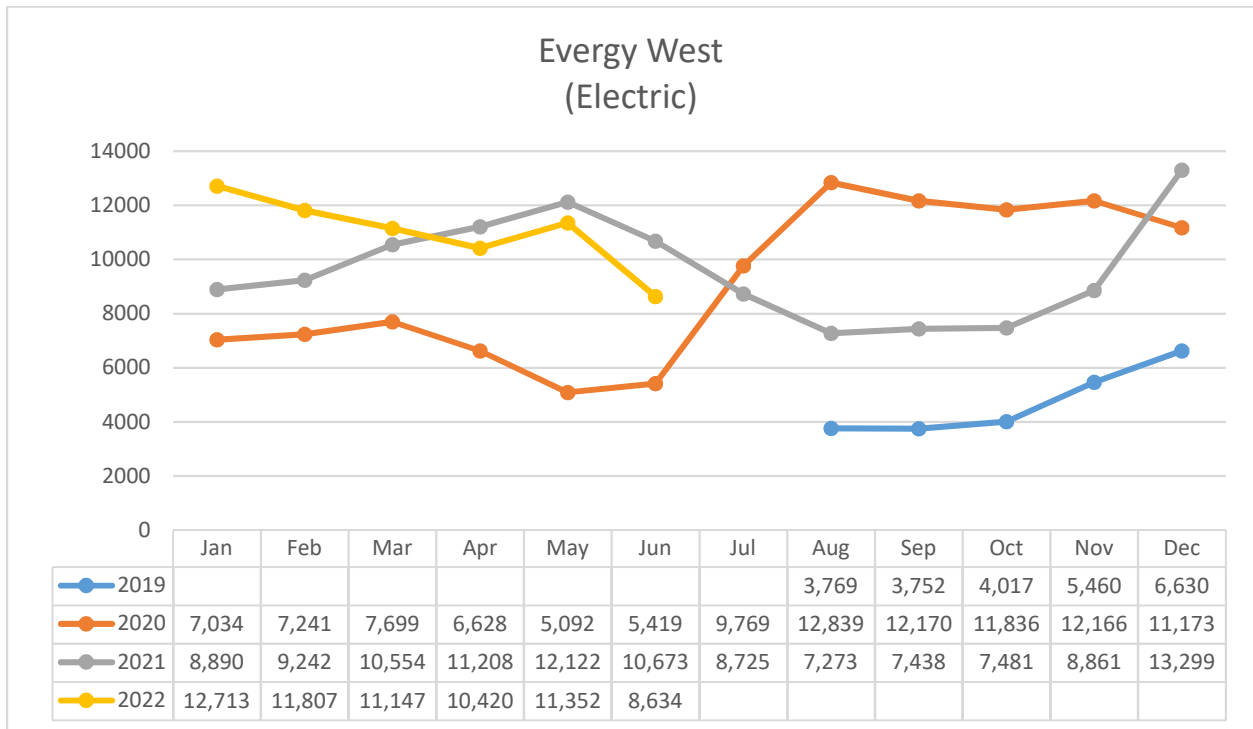


**c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end**



As shown by Eversky West’s data, for those customers who received a final disconnection notice, there were 26,122 customers who were not disconnected in March 2022 versus 0 in March 2021, 211% more in April 2022 versus April 2021, 147% more in May 2022 versus May 2021, and 291% more in June 2022 versus June 2021. There were 2% fewer customers who received a final disconnection notice in March 2022 compared to February 2022, 13% fewer in April 2022 compared to March 2022, 16% fewer in May 2022 compared to April 2022, and 12% more in June 2022 compared to May 2022.

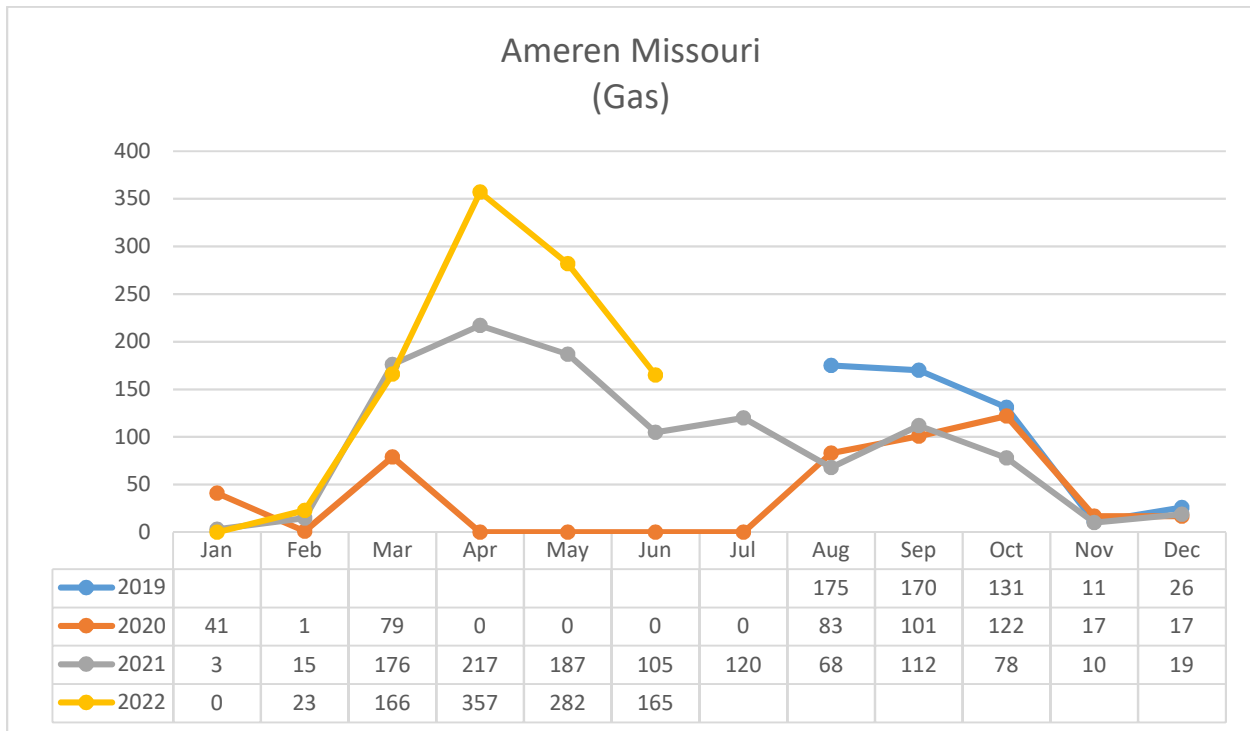
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 6% more Evergy West customers who participated in payment plans in March 2022 versus March 2021, 7% fewer in April 2022 versus April 2021, 6% fewer in May 2022 versus May 2021, and 19% fewer in June 2022 versus June 2021. There were approximately 6% fewer customers who participated in payment plans in March 2022 compared to February 2022, 7% fewer in April 2022 compared to March 2022, 9% more in May 2022 compared to April 2022, and 24% fewer in June 2022 compared to May 2022.

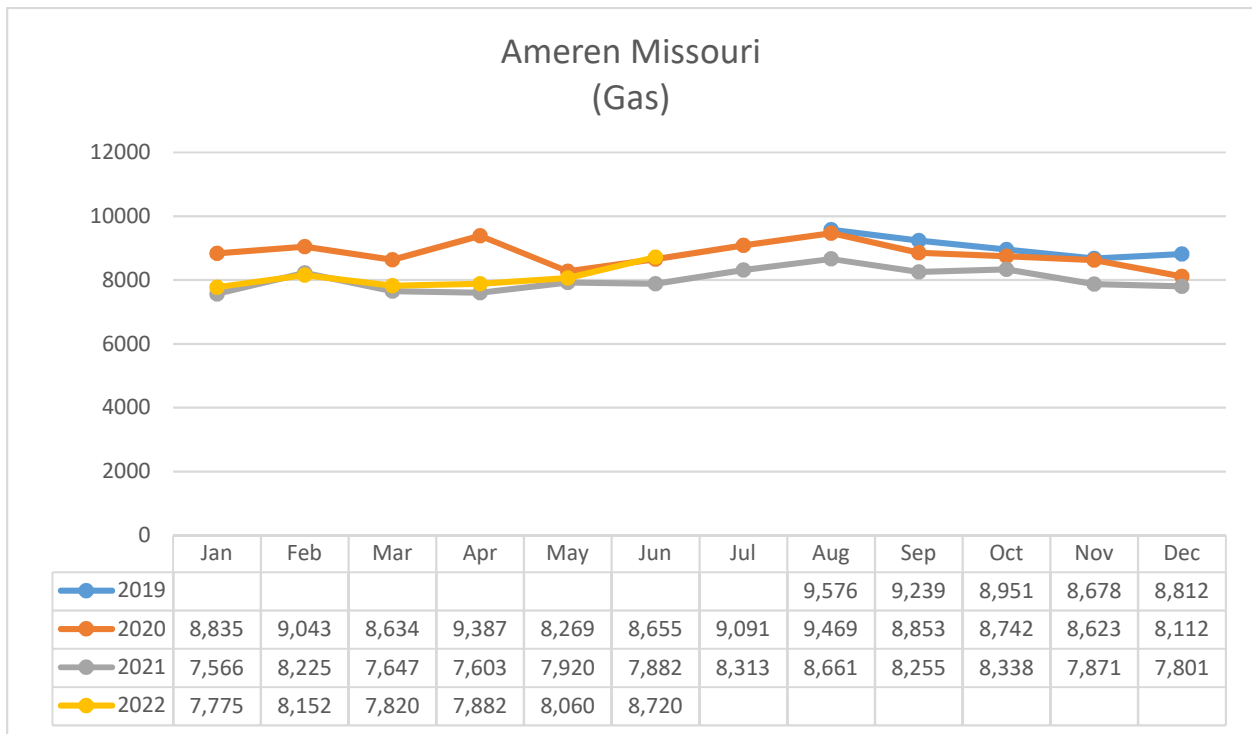
**Question 1 (Ameren Missouri – Gas)**

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



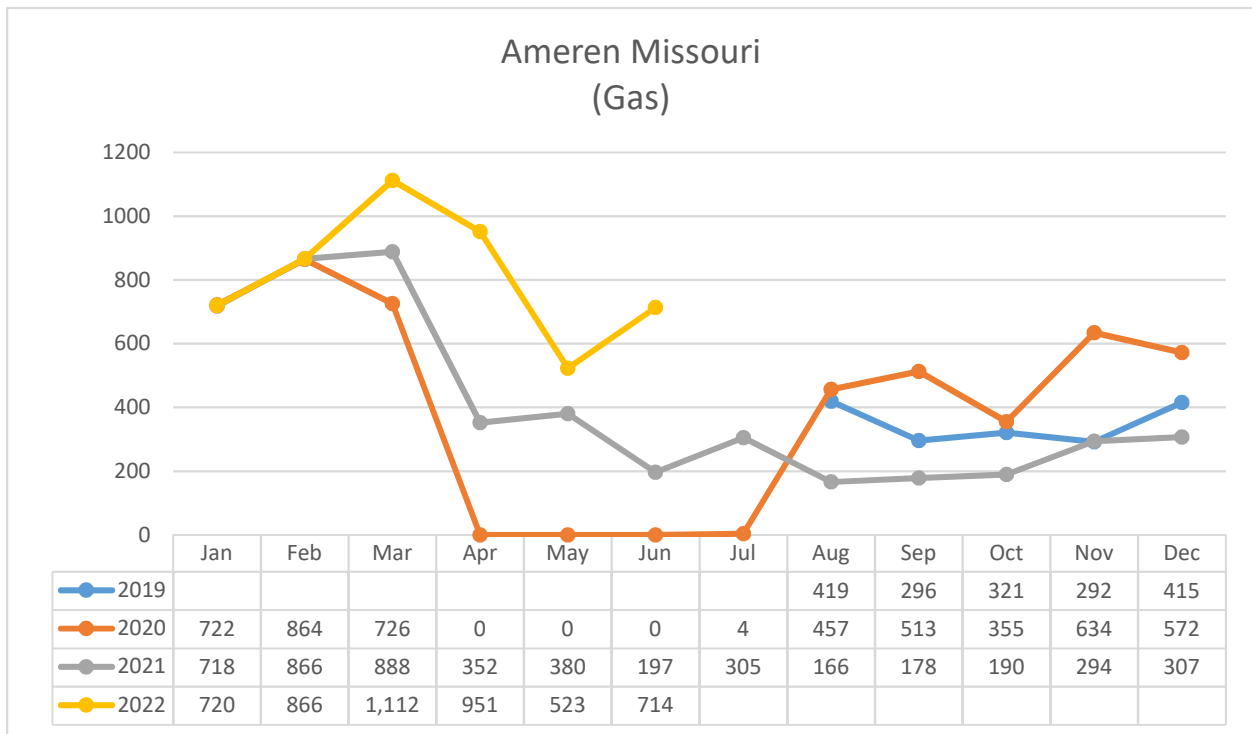
As shown in the previous graph, Ameren Missouri performed 53% more disconnections for non-payment in February 2022 versus February 2021, 6% fewer in March 2022 versus March 2021, 65% more in April 2022 versus April 2021, 51% more in May 2022 versus May 2021, and 57% more in June 2022 versus June 2021. There were 23 more disconnections for non-payment in February 2022 compared to January 2022, 622% more in March 2022 compared to February 2022, 115% more in April 2022 compared to March 2022, 21% fewer in May 2022 compared to April 2022, and 41% fewer in June 2022 compared to May 2022. There were 43% fewer actual disconnections by Ameren Missouri in February 2022 than the amount projected by Ameren Missouri for the same month. There were 23 disconnections for non-payment services in February 2022 versus 1 pre-pandemic, February 2020. The projected number of disconnections was not received for March, April, or May. The projected number of disconnections for June was 38% below the number of actual disconnections.

**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”**



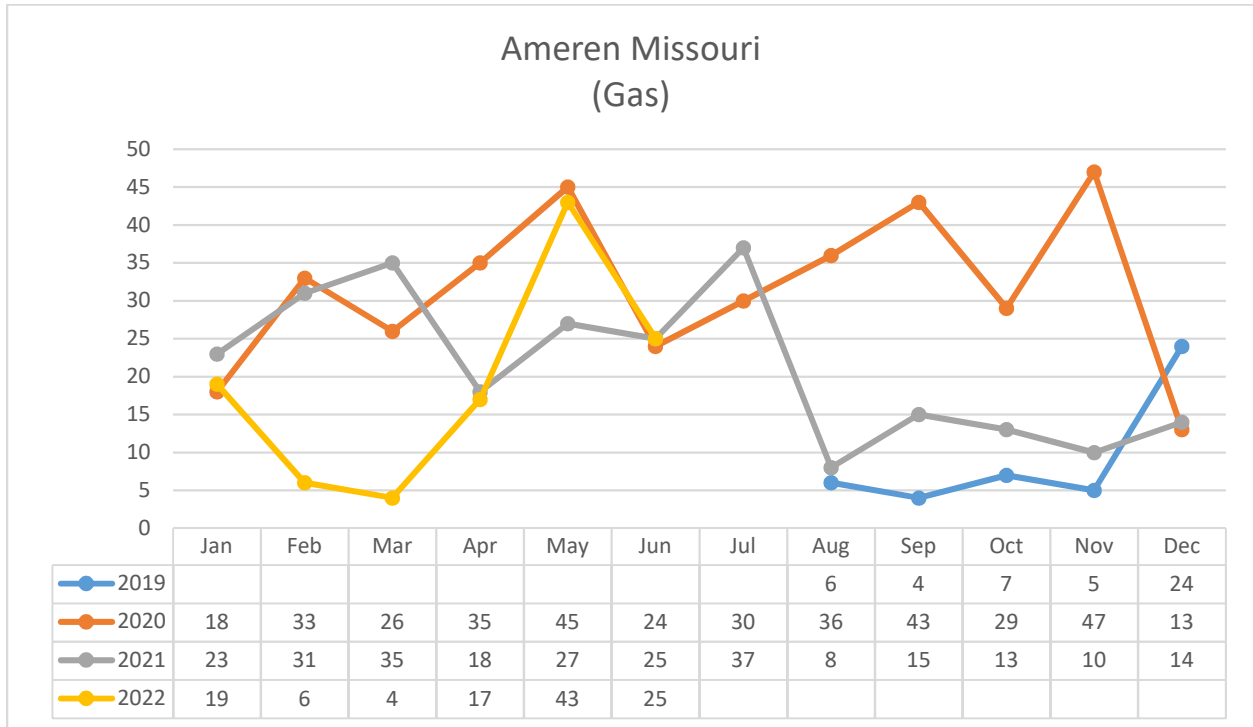
The previous data indicates that there were approximately 1% fewer Ameren Missouri customers with past-due accounts in February 2022 versus February 2021, 2% more in March 2022 versus March 2021, 4% more in April 2022 versus April 2021, 2% more in May 2022 versus May 2021, and 11% more in June 2022 versus June 2021. There were approximately 5% more customers with past-due accounts in February 2022 compared to January 2022, 4% fewer in March 2022 compared to February 2022, 1% more in April 2022 compared to March 2022, 2% more in May 2022 compared to April 2022, and 8% more in June 2022 compared to May 2022. There were about 10% fewer customers with past-due accounts in February 2022 versus pre-pandemic, February 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 the same number of customers who were not disconnected in February 2022 versus February 2021, 25% more customers who were not disconnected in March 2022 versus March 2021, 170% more in April 2022 versus April 2021, 38% more in May 2022 versus May 2021, and 262% more in June 2022 versus June 2021. There were approximately 20% more in February 2022 compared to January 2022, 28% more customers who received a final disconnection notice in March 2022 compared to February 2022, 14% fewer in April 2022 compared to March 2022, 45% fewer in May 2022 compared to April 2022, and 37% more in June 2022 compared to May 2022. There were 2 more customers who received a final disconnection notice, but have not been disconnected for non-payment in February 2022 versus pre-pandemic, February 2020.

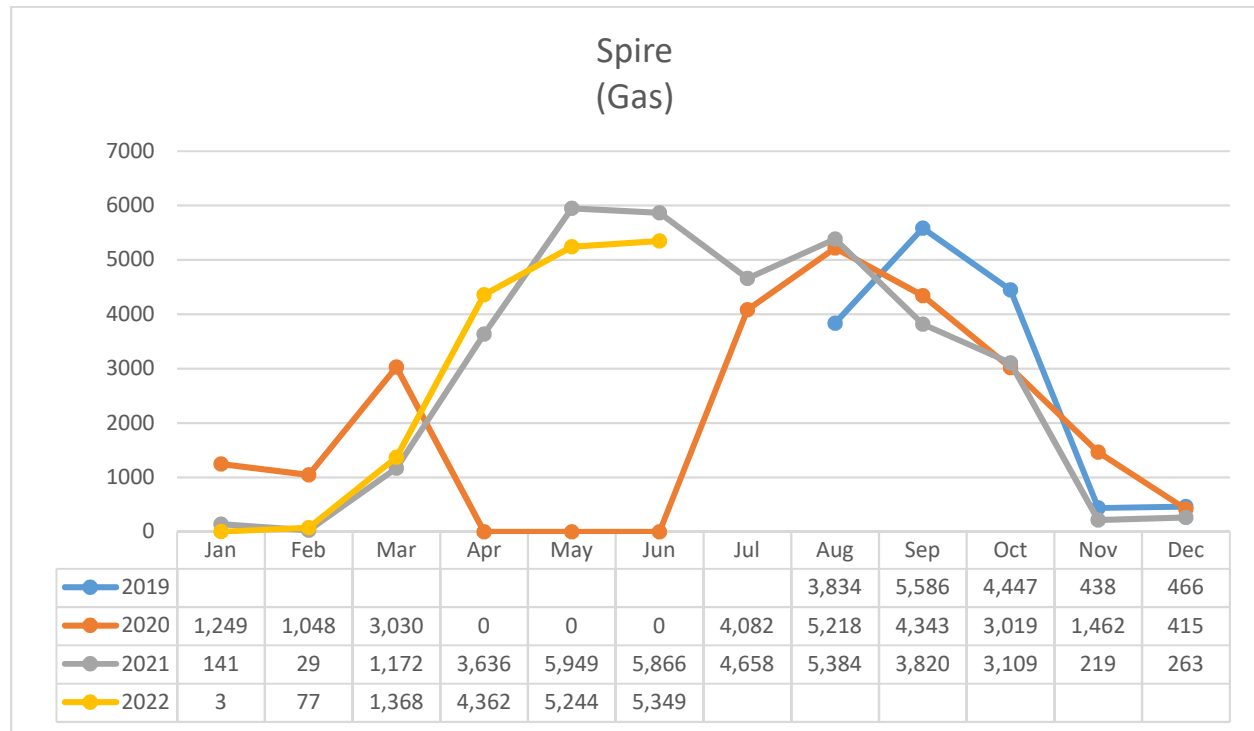
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there was 81% fewer Ameren Missouri customers who participated in payment plans in February 2022 versus February 2021, 89% fewer in March 2022 versus March 2021, 1 less in April 2022 versus April 2021, 59% more in May 2022 versus May 2021, and the same number of customers in June 2022 versus June 2021. There were 68% fewer customers participating in February 2022 compared to January 2022, 2 fewer in March 2022 compared to February 2022, 325% more in April 2022 compared to March 2022, 153% more in May 2022 compared to April 2022, and 42% fewer in June 2022 compared to May 2022. There were 82% fewer customers participating in a payment plan in February 2022 versus in pre-pandemic, February 2020.

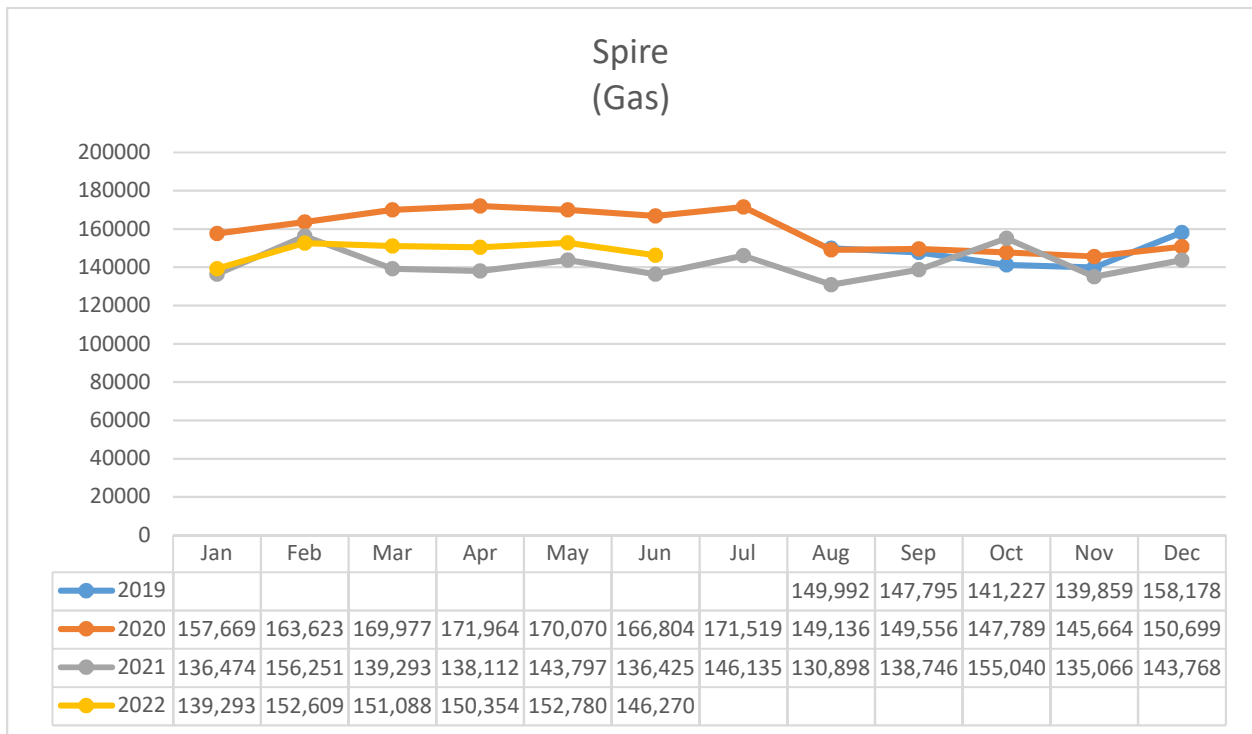
**Question 1 (Spire - Gas)**

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



As shown in the previous graph, Spire performed approximately 17% more disconnections for non-payment in March 2022 versus March 2021, 20% more in April 2022 versus April 2021, 12% fewer in May 2022 versus May 2021, and 9% fewer in June 2022 versus June 2021. There were 1368 disconnections for non-payment in March 2022 compared to 77 in February 2022, 219% more in April 2022 compared to March 2022, 20% more in May 2022 compared to April 2022, and 2% more in June 2022 compared to May 2022. The projected number of disconnections for March 2022 was not submitted before the month end. The actual number of disconnections for April 2022 was 12% lower than the projected number of disconnections, 51% lower for May 2022 and 46% lower for June 2022.

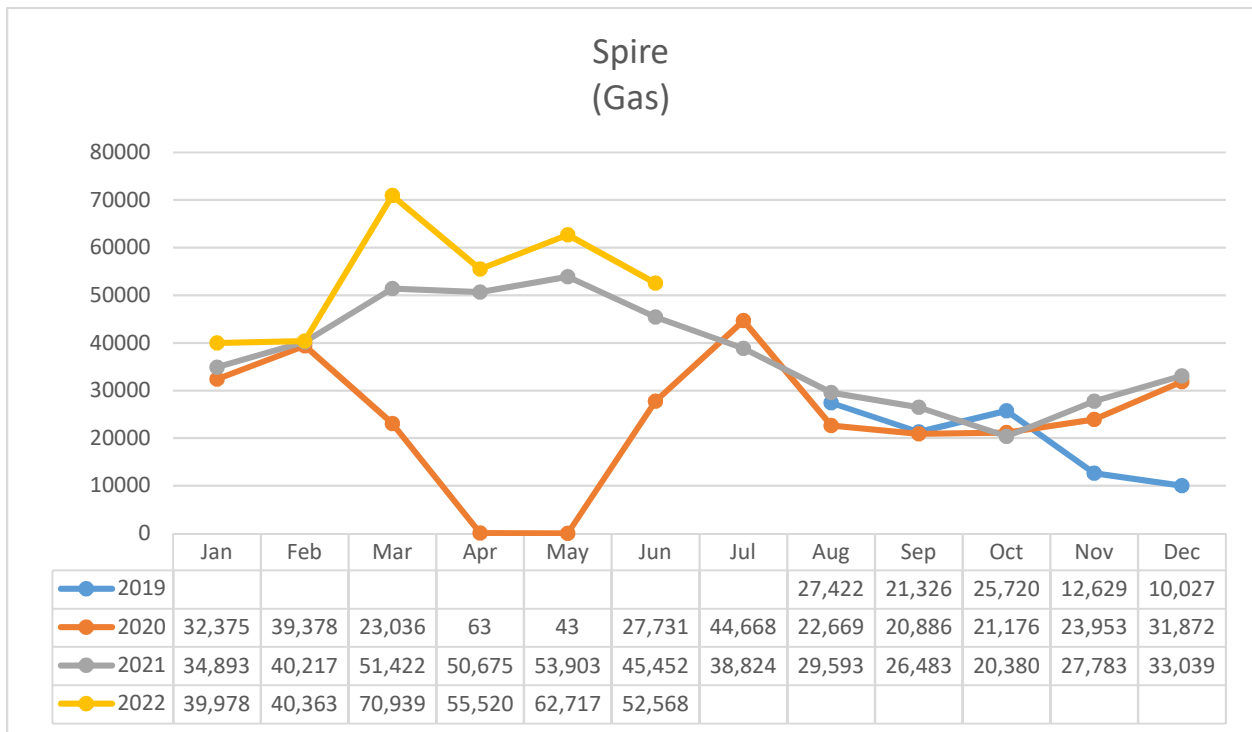
**b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”**



The previous data indicates that there were about 8% more Spire customers with past-due accounts in March 2022 versus March 2021, 9% more in April 2022 versus April 2021, 6% more in May 2022 versus May 2021, and 7% more in June 2022 versus June 2021. There were about 1% less customers with past-due accounts in March 2022 compared to February 2022, less than 1% fewer in April 2022 compared to March 2022, 2% more in May 2022 compared to April 2022, and 4% fewer in June 2022 compared to May 2022. 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.

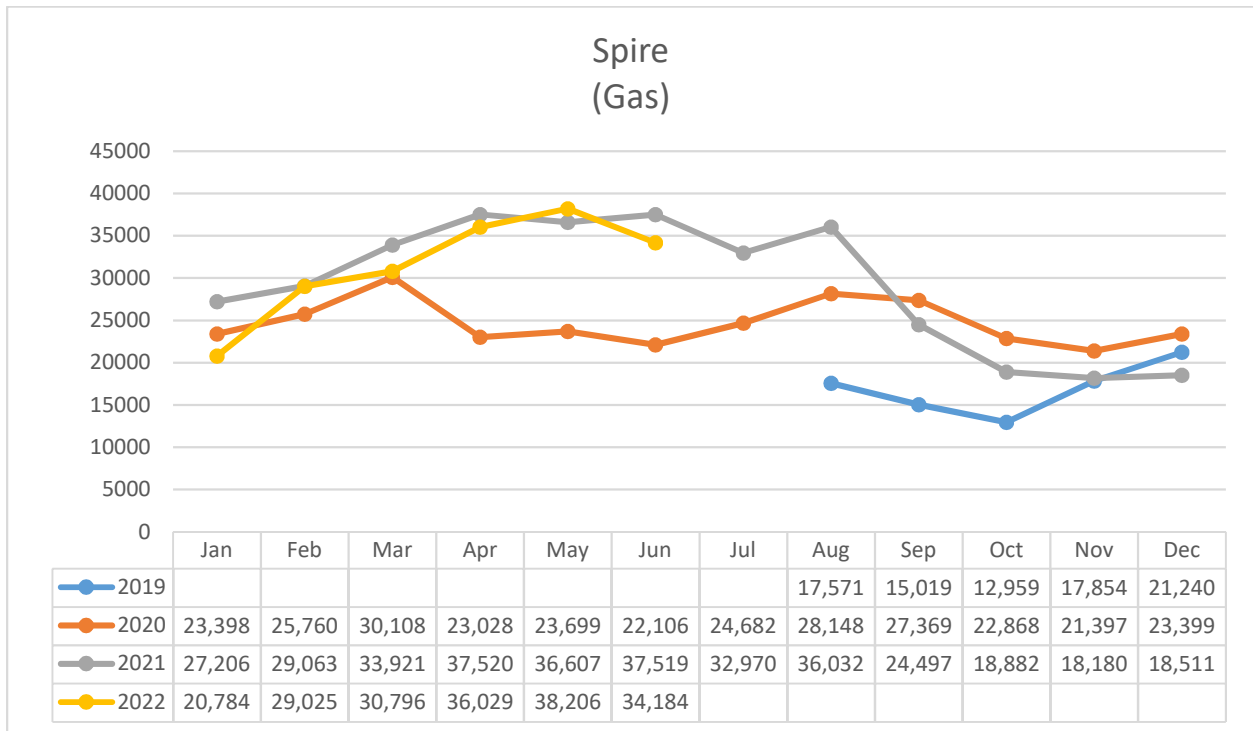


**c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end**



As shown by Spire’s data, for those customers who received a final disconnection notice there was 38% more customers who were not disconnected in March 2022 versus March 2021, 10% more in April 2022 versus April 2021, 16% more in May 2022 versus May 2021, and 16% more in June 2022 versus June 2021. There were 76% more customers who received a final disconnection notice in March 2022 compared to February 2022, 22% fewer in April 2022 compared to March 2022, 13% more in May 2022 compared to April 2021, and 16% fewer in June 2022 compared to May 2021.

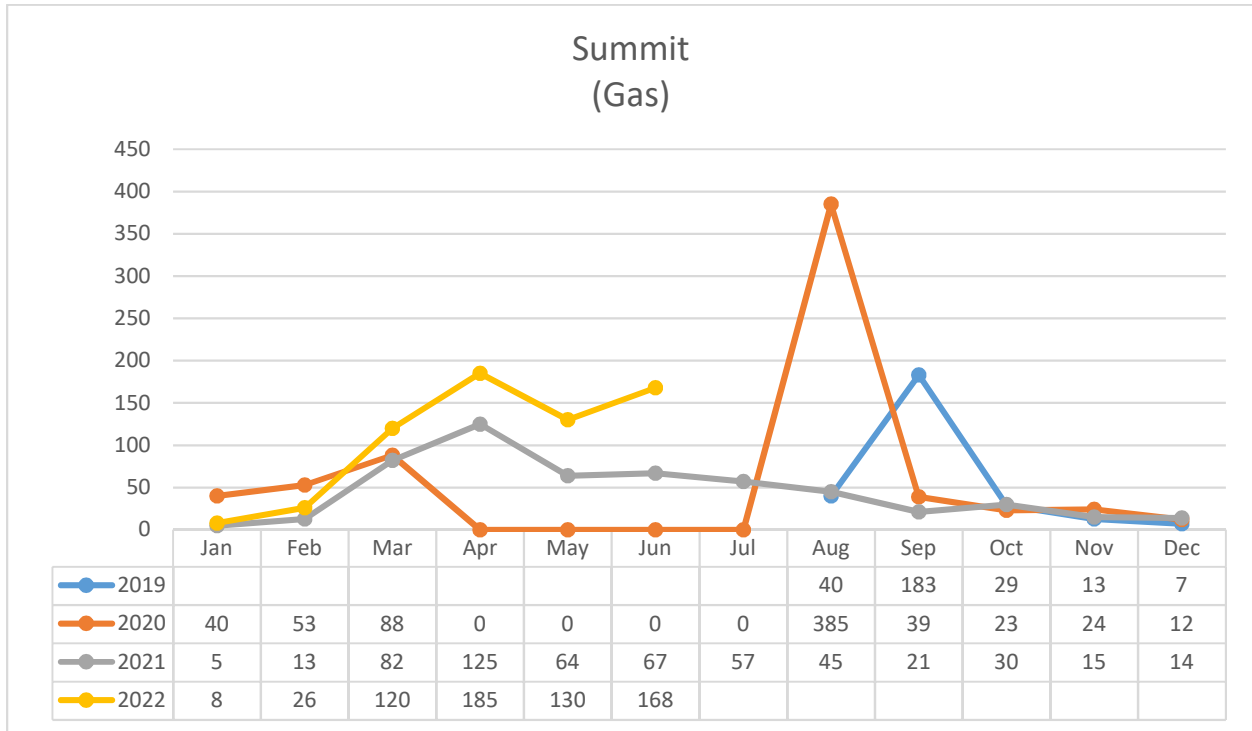
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were 9% fewer Spire customers who participated in payment plans in March 2022 versus March 2021, 4% fewer in April 2022 versus April 2021, 4% more in May 2022 versus May 2021, and 9% fewer in June 2022 versus June 2021. There were approximately 6% more customers who participated in payment plans in March 2022 compared to February 2022, 17% more in April 2022 compared to March 2022, 6% more in May 2022 compared to April 2022, and 11% fewer in June 2022 compared to June 2021.

**Question 1 (Summit - Gas)<sup>6</sup>**

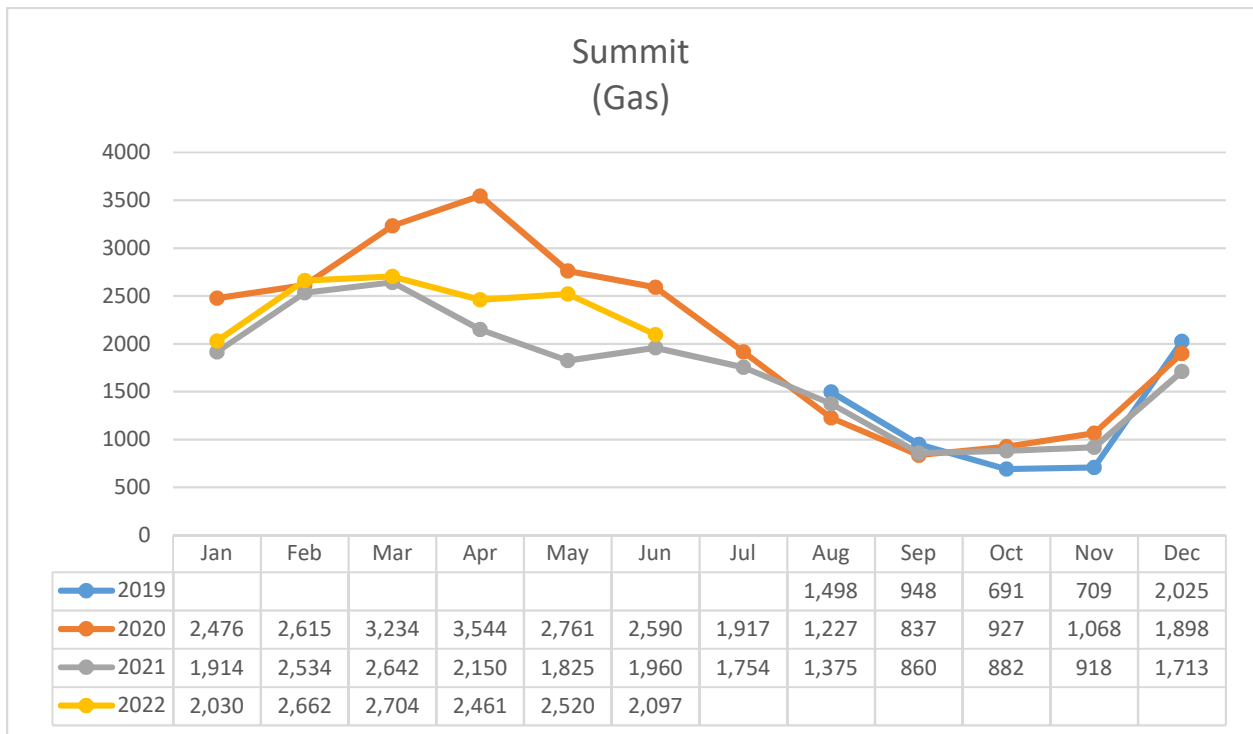
**a) The number of disconnections for non-payment of services as of each month-end**



As shown in the previous graph, Summit performed 46% more disconnections for non-payment in March 2022 versus March 2021, 48% more in April 2022 versus April 2021, 103% more in May 2022 versus May 2021, and 151% more in June 2022 versus June 2021. There were 362% more disconnections in March 2022 compared to February 2022, 54% more in April 2022 compared to March 2022, 30% fewer in May 2022 compared to April 2022, and 29% more in June 2022 compared to May 2022. The number of actual disconnections by Summit in March 2022 was 36% more than the amount projected by Summit for the same month, 49% more in April 2022, 103% more in May 2022, and 93% more in June 2022.

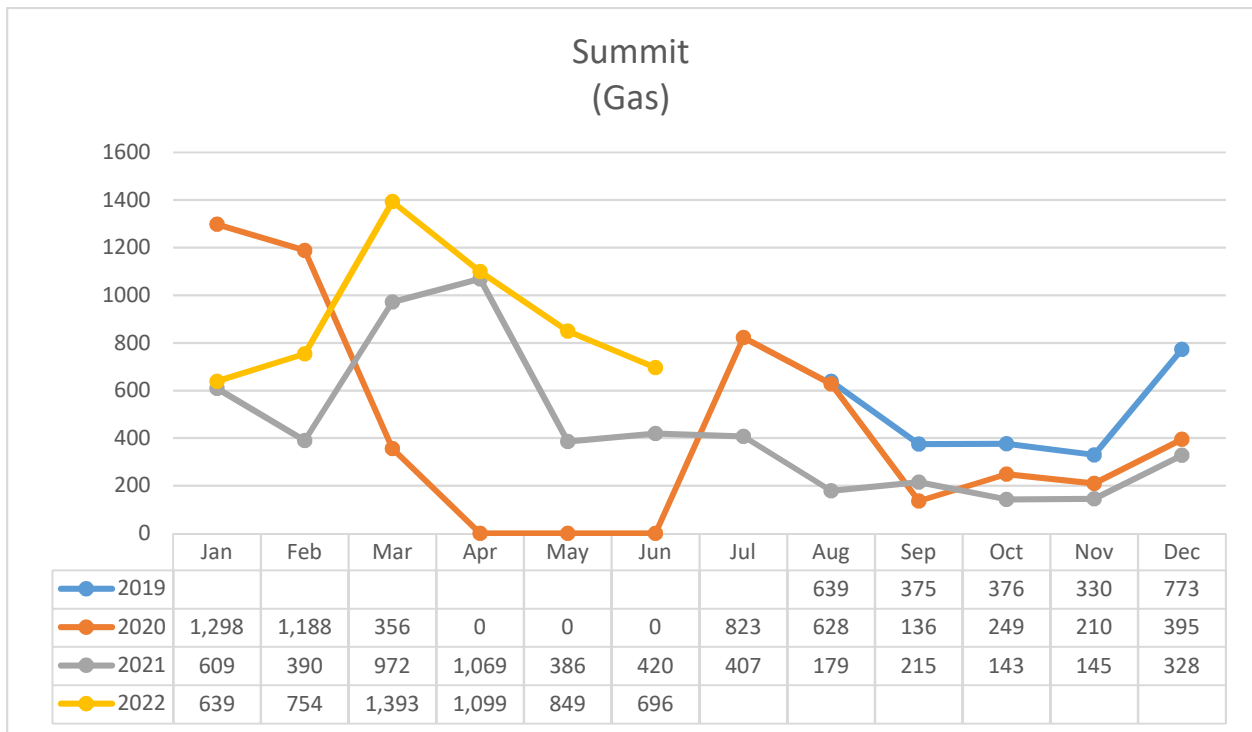
<sup>6</sup> Revised Data Request Response No. 0007.1 stated a discrepancy was identified in the numbers reported for sections 1(a),1(b),1(c), and 1(d). Data would sometimes fluctuate from a previous response in subsequent months. Data variations include information updated to utilize dates of resolutions, customers on Budget Bill were included but actually not past-due, data updated to only count an account once per month instead of based on how many total notices were sent, and variances in live date.

**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”**



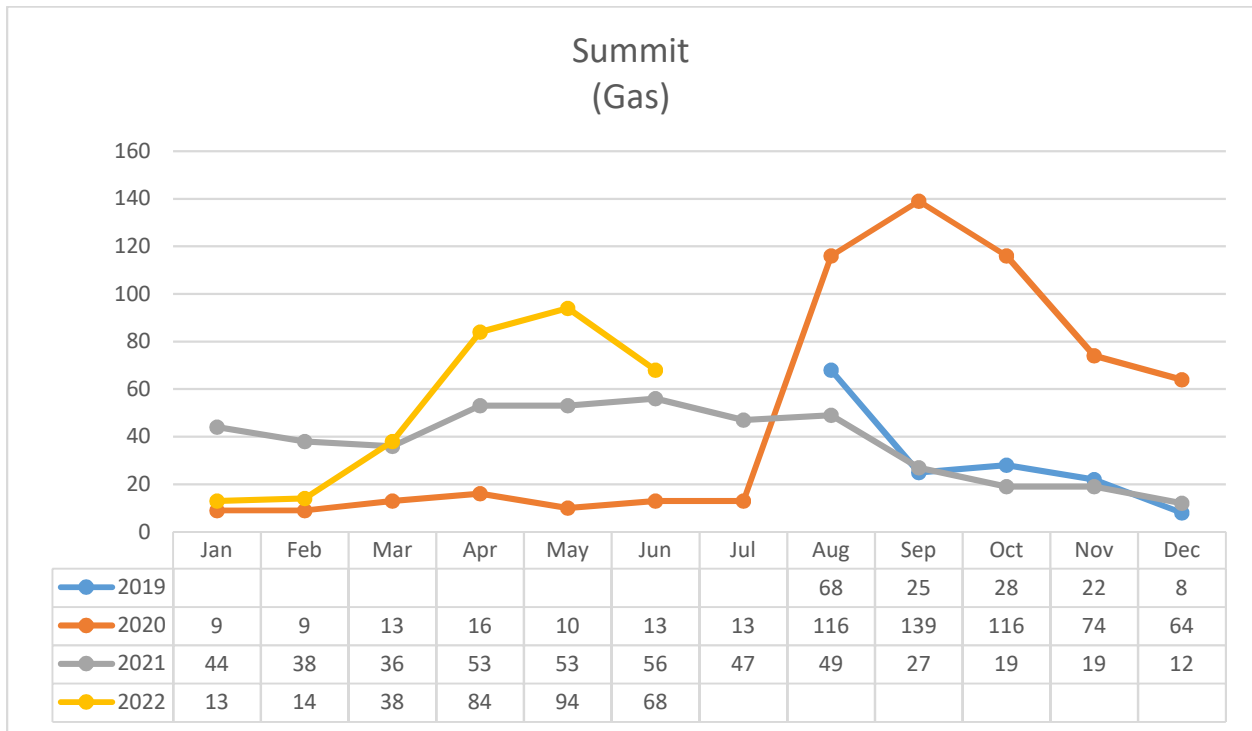
The previous data indicates that there were about 2% more Summit customers with past-due accounts in March 2022 versus March 2021, 14% more in April 2022 versus April 2021, 38% more in May 2022 versus May 2021, and 7% more in June 2022 versus June 2021. There were 2% more customers with past-due accounts in March 2022 compared to February 2022, 9% fewer in April 2022 compared to March 2022, 2% more in May 2022 compared to April 2022, and 17% fewer in June 2022 compared to May 2022. 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 approximately 43% more customers who were not disconnected in March 2022 versus March 2021, 3% more in April 2022 versus April 2021, 120% more in May 2022 versus March 2021, and 66% more in June 2022 versus June 2021. There were approximately 85% more customers who received a final disconnection notice in March 2022 compared to February 2022, 21% fewer in April 2022 compared to March 2022, 23% fewer in May 2022 compared to April 2022, and 18% fewer in June 2022 compared to May 2022.

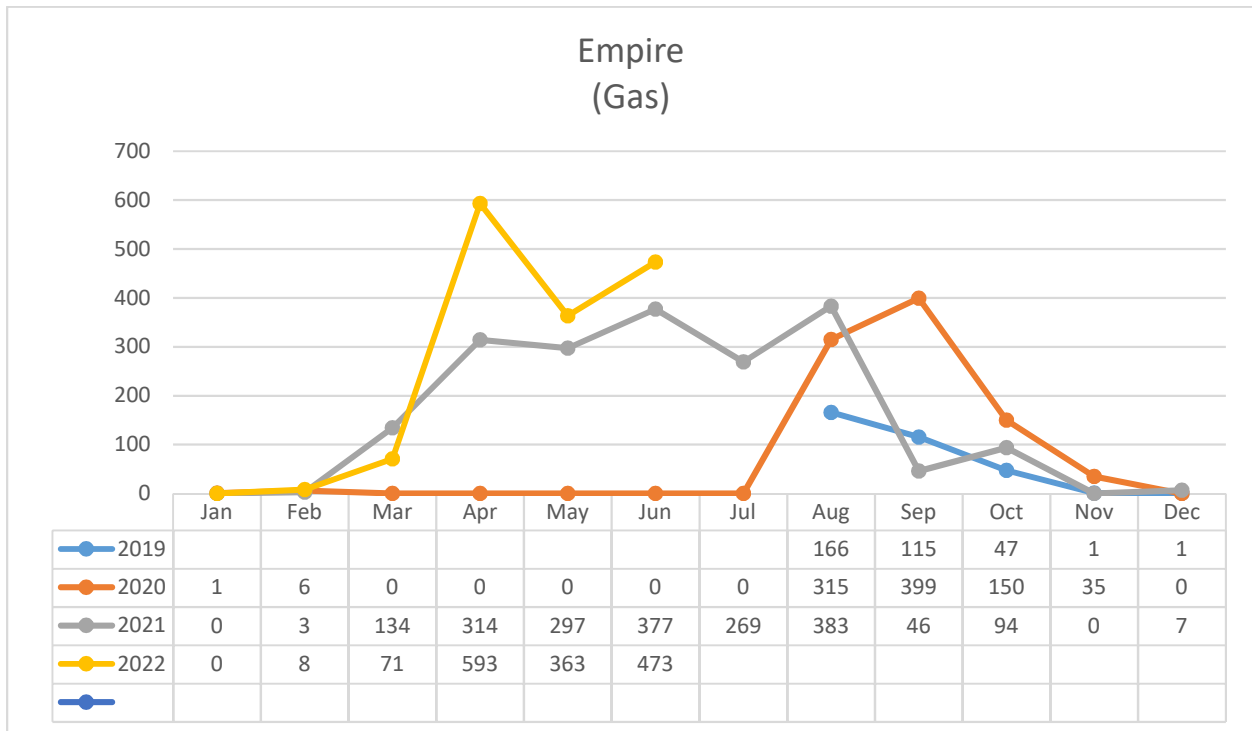
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 6% more Summit customers who participated in payment plans in March 2022 versus March 2021, 58% more in April 2022 versus April 2021, 77% more in May 2022 versus May 2021, and 21% more in June 2022 versus June 2021. There were 171% more customers who participated in payment plans in March 2022 compared to February 2022, 121% more in April 2022 compared to March 2022, 12% more in May 2022 compared to April 2022, and 28% fewer in June 2022 compared to May 2022.

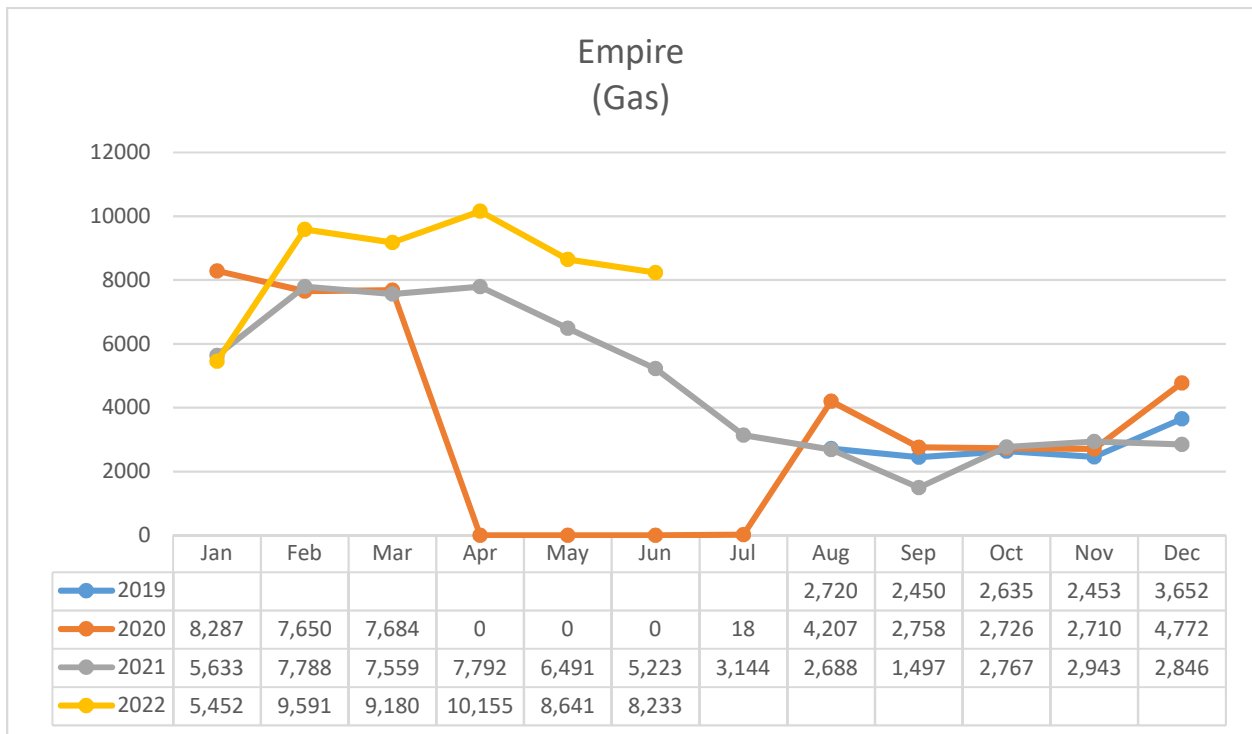
**Question 1 (Empire - Gas)**

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



As shown in the previous graph, Empire performed 47% fewer disconnections for non-payment in March 2022 versus March 2021, 89% more in April 2022 versus April 2021, 22% more in May 2022 versus May 2021, and 25% more in June 2022 versus June 2021. There were 788% more disconnections for non-payment in March 2022 compared to February 2022, 735% more in April 2022 compared to March 2022, 39% less in May 2022 compared to April 2022, and 30% more in June 2022 compared to May 2022. The projected number of disconnections by Empire for March 2022 was not provided. The actual number of disconnections for April 2022 was 114% more than the projected number of disconnections, 40% more for May 2022, and 39% more for June 2022.

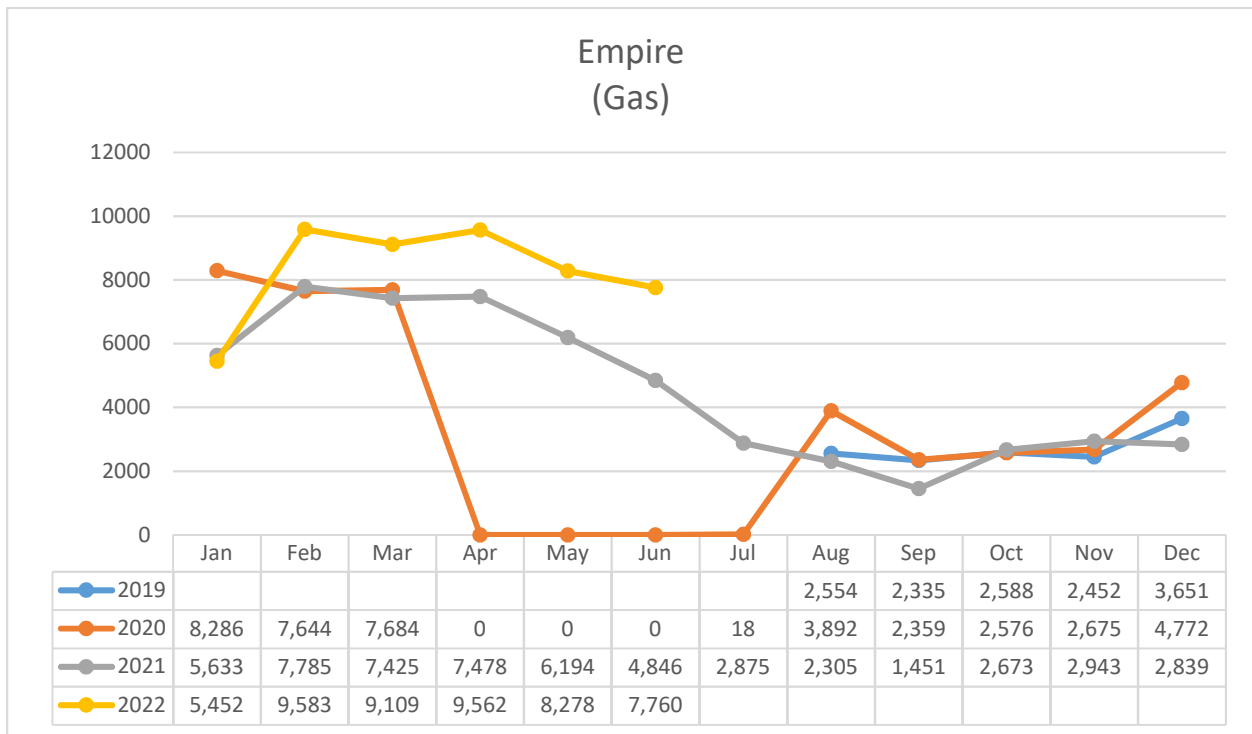
**b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”**



The previous data indicates that there were approximately 21% more Empire customers with past-due accounts in March 2022 versus March 2021, 30% more in April 2022 versus April 2021, 33% more in May 2022 versus May 2021, and 58% more in June 2022 versus June 2021. There were 4% fewer customers with past-due accounts in March 2022 compared to February 2022, 11% more in April 2022 compared to March 2022, 15% fewer in May 2022 compared to April 2022, and 5% fewer in June 2022 compared to May 2022. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement due date.

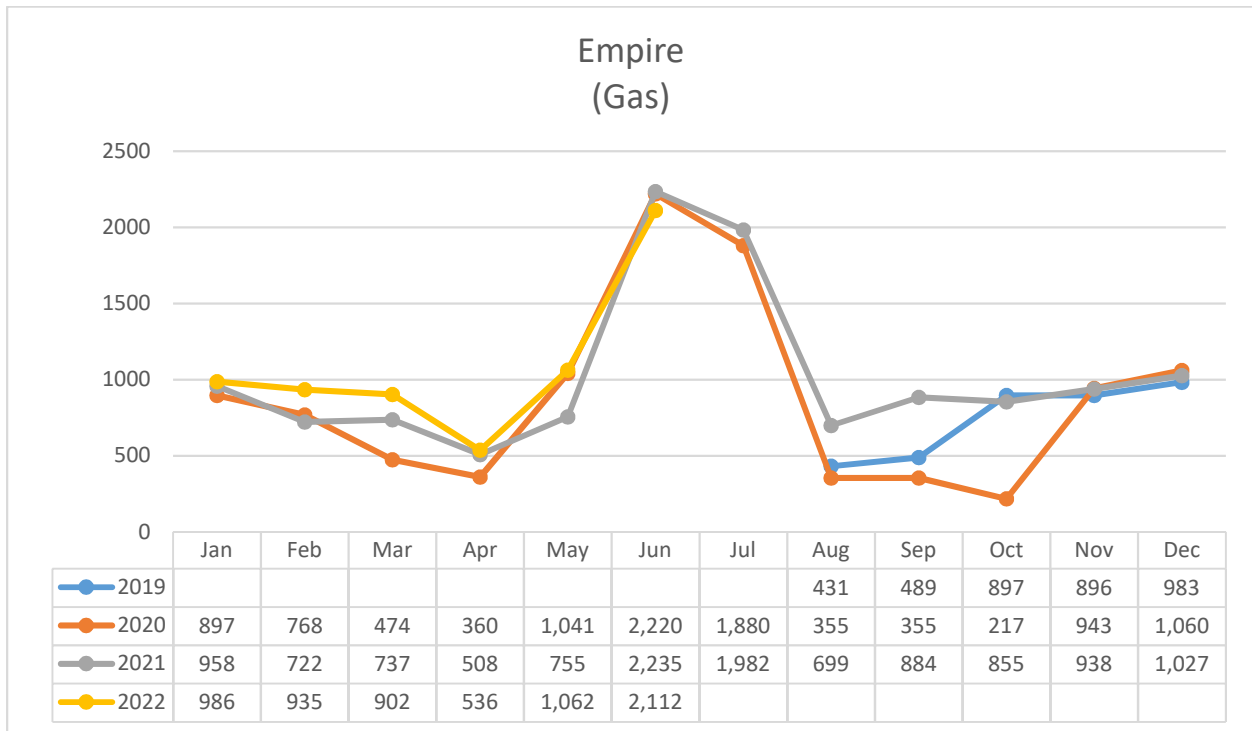


**c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end**



As shown by Empire’s data, for those customers who received a final disconnection notice there were approximately 23% more customers who were not disconnected in March 2022 versus March 2021, 28% more in April 2022 versus April 2021, 34% more in May 2022 versus May 2021, and 60% more in June 2022 versus June 2021. There were 5% fewer customers who received a final disconnection notice in March 2022 compared to February 2022, 5% more in April 2022 compared to March 2022, 13% fewer in May compared to April 2022, and 6% fewer in June 2022 compared to May 2022.

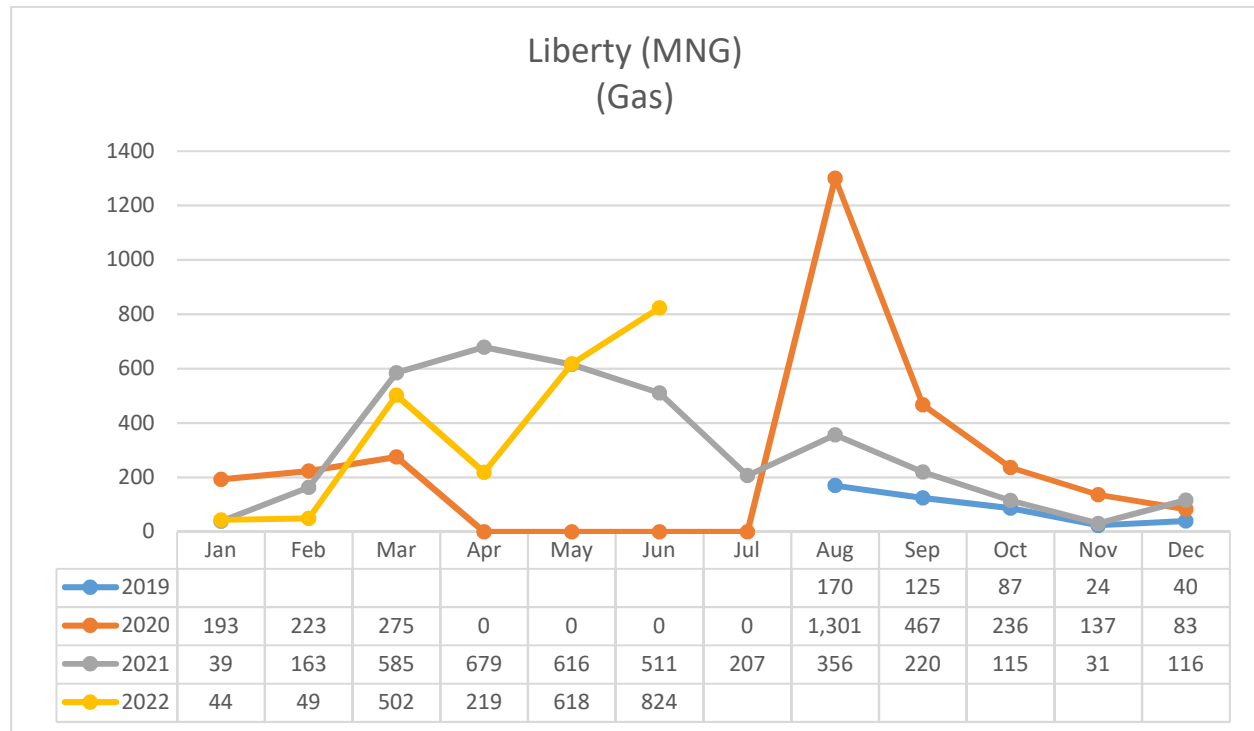
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were 22% more Empire customers who participated in payment plans in March 2022 versus March 2021, 6% more in April 2022 versus April 2021, 41% more in May 2022 versus May 2021, and 6% fewer in June 2022 versus June 2021. There were about 4% fewer customers who participated in payment plans in March 2022 compared to February 2022, 41% fewer in April 2022 compared to March 2022, 98% more in May 2022 compared to April 2022, and 99% more in June 2022 compared to May 2022.

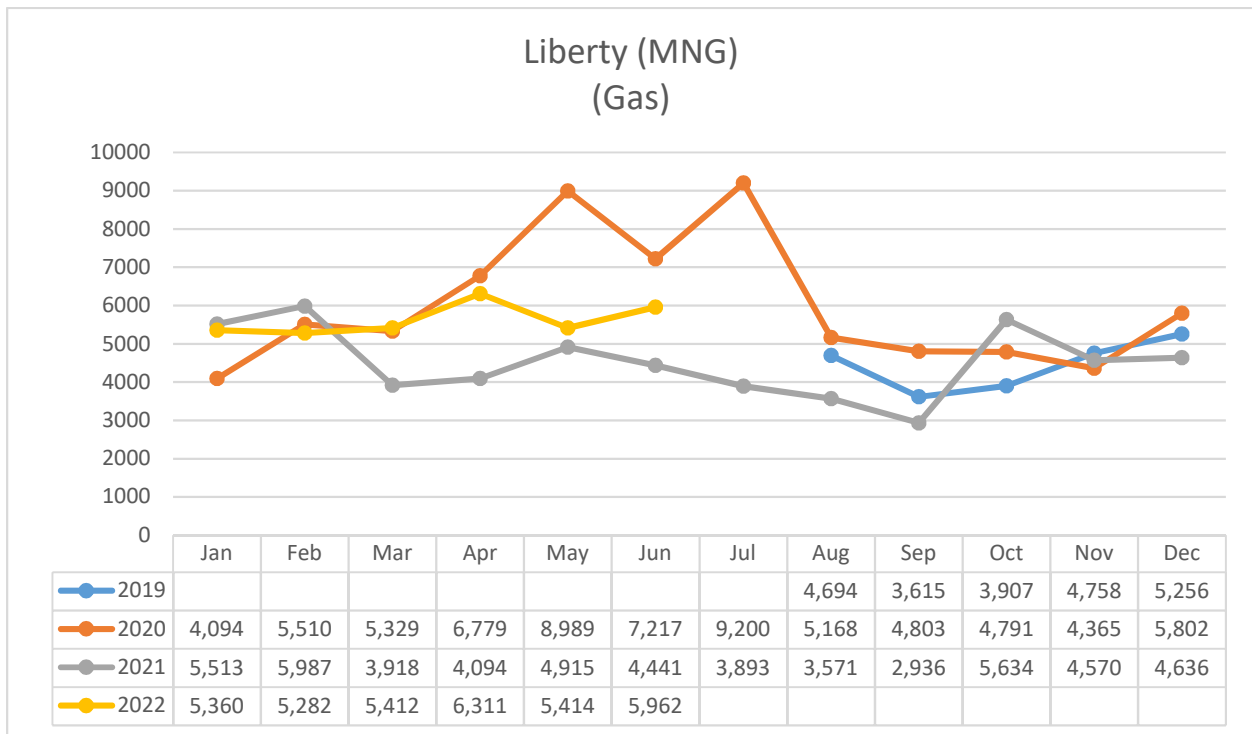
**Question 1 (Liberty (MNG) - Gas)**

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



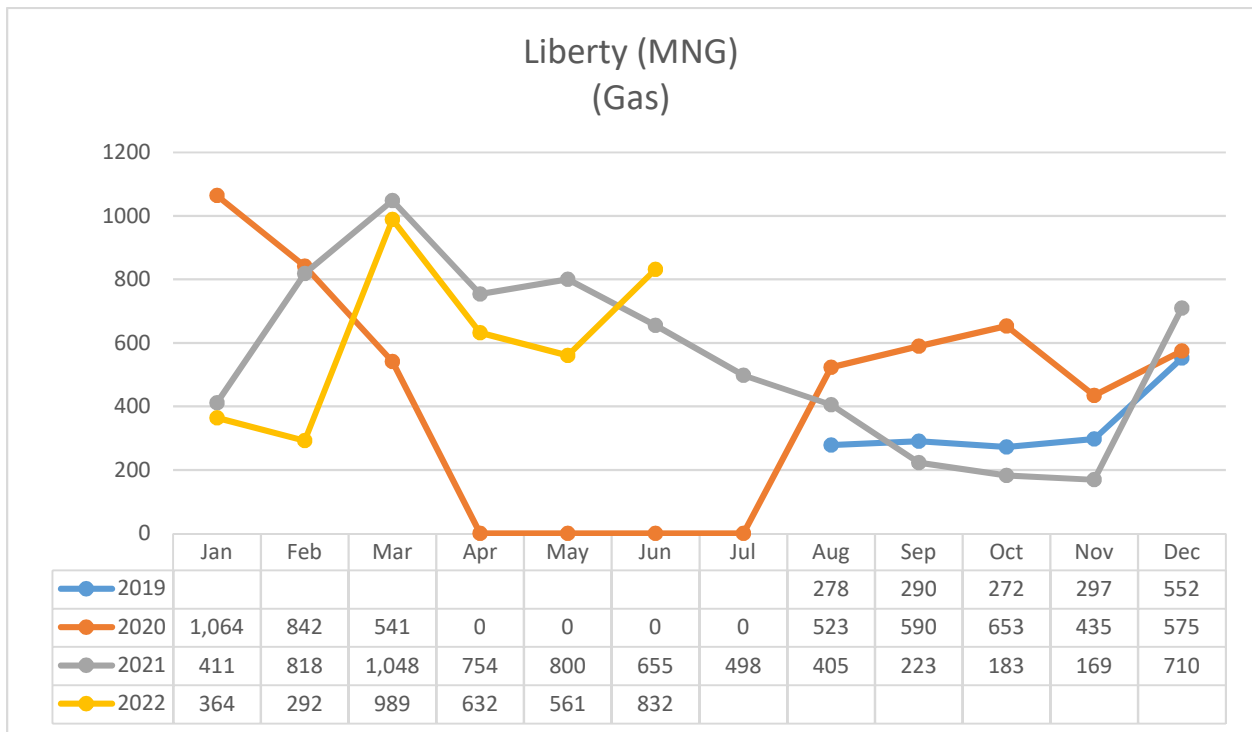
As shown in the previous graph, Liberty (MNG) performed 14% fewer disconnections for non-payment in March 2022 versus March 2021, 68% fewer in April 2022 versus April 2021, less than 1% more in May 2022 versus May 2021, and 61% more in June 2022 versus June 2021. There were 924% more disconnections for non-payment in March 2022 compared to February 2022, 56% fewer in April 2022 compared to March 2022, 182% more in May 2022 compared to April 2022, and 33% more in June 2022 compared to May 2022. The projected number of disconnections by Liberty (MNG) for March 2022 was not provided. The actual number of disconnections in April 2022 was 73% below the amount projected by Liberty (MNG) for the same month, 23% below in May 2022, and 18% above in June 2022.

**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”**



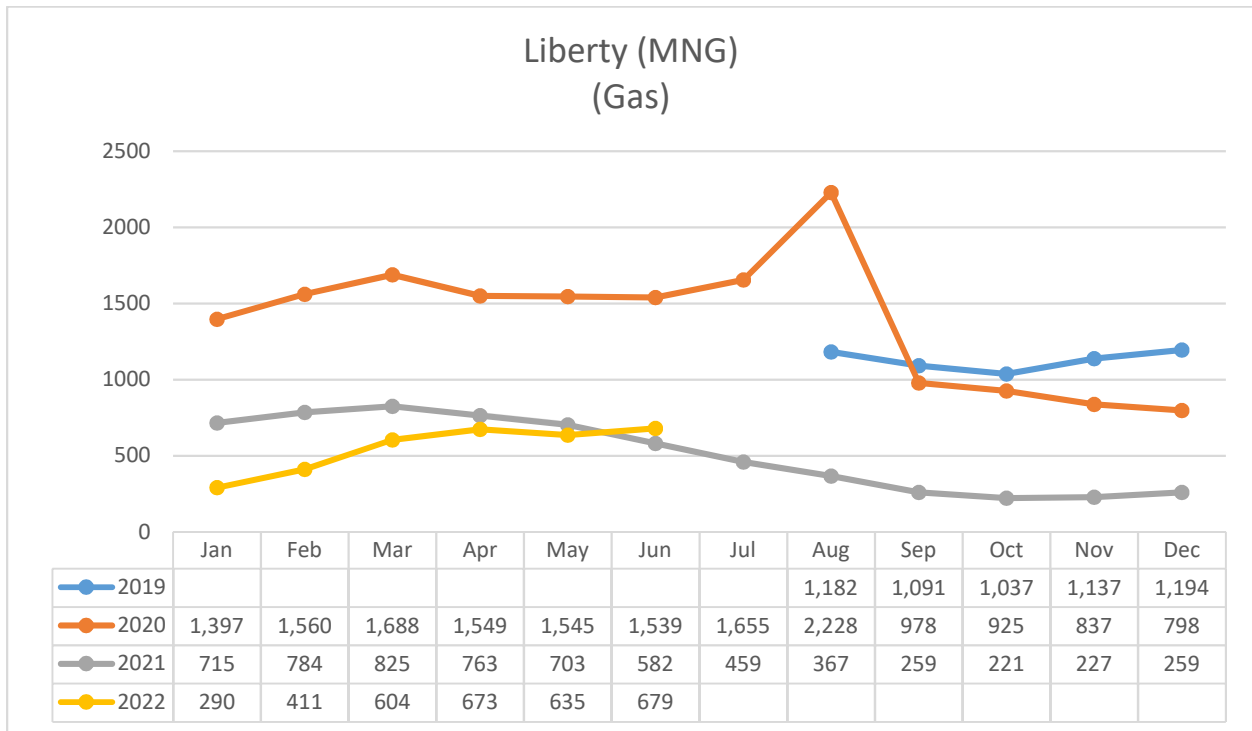
The previous data indicates that there were approximately 38% more Liberty (MNG) customers with past-due accounts in March 2022 versus March 2021, 54% more in April 2022 versus April 2021, 10% more in May 2022 versus May 2021, and 34% more in June 2022 versus June 2021. There were approximately 2% more customers with past-due accounts in March 2022 compared to February 2022, 17% more in April 2022 compared to March 2022, 14% fewer in May 2022 compared to April 2022, and 10% more in June 2022 compared to May 2022. 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 6% fewer customers who were not disconnected in March 2022 versus March 2021, 16% fewer in April 2022 versus April 2021, 30% fewer in May 2022 versus May 2021, and 27% more in June 2022 versus June 2021. There were approximately 239% more customers who received a final disconnection notice in March 2022 compared to February 2022, 36% fewer in April 2022 compared to March 2022, 11% fewer in May 2022 compared to April 2022, and 48% more in June 2022 compared to May 2022.

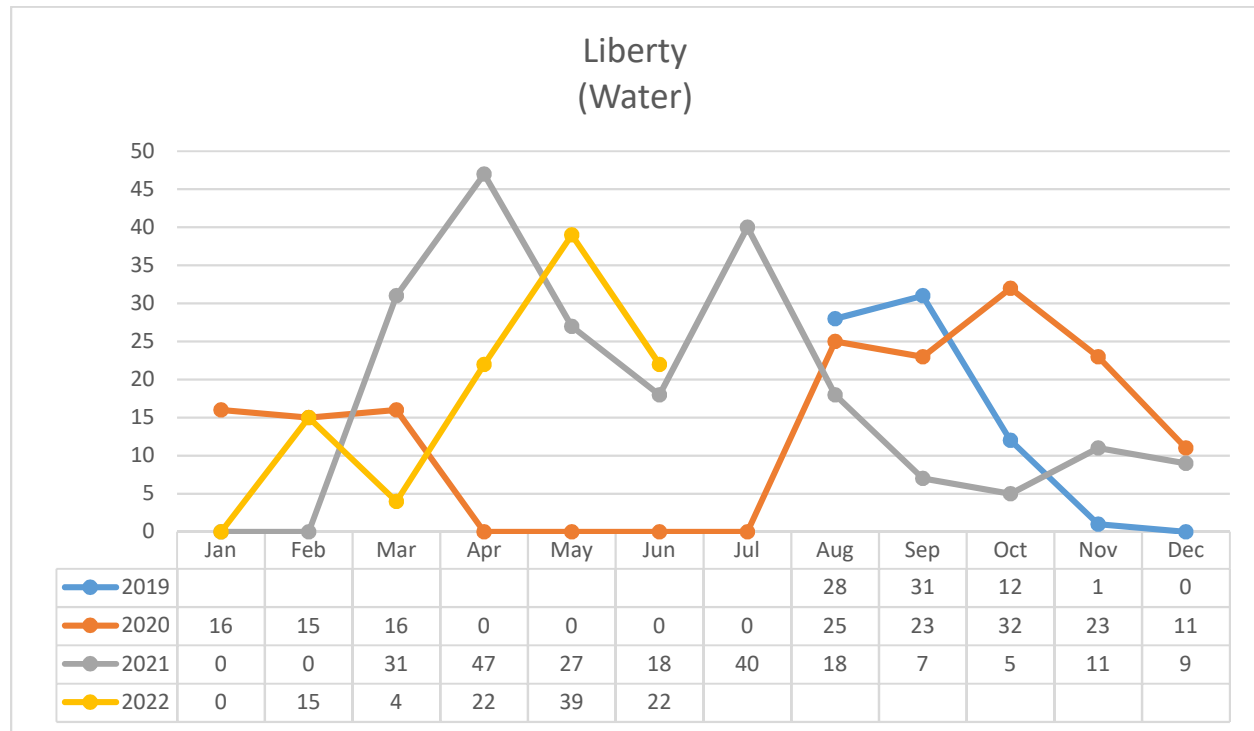
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 27% fewer Liberty (MNG) customers who participated in payment plans in March 2022 versus March 2021, 12% fewer in April 2022 versus April 2021, 10% fewer in May 2022 versus May 2021, and 17% more in June 2022 versus June 2021. There were 47% more customers participating in payment plans in March 2022 compared to February 2022, 11% more in April 2022 compared to March 2022, 6% fewer in May 2022 compared to April 2022, and 7% more in June 2022 compared to May 2022.

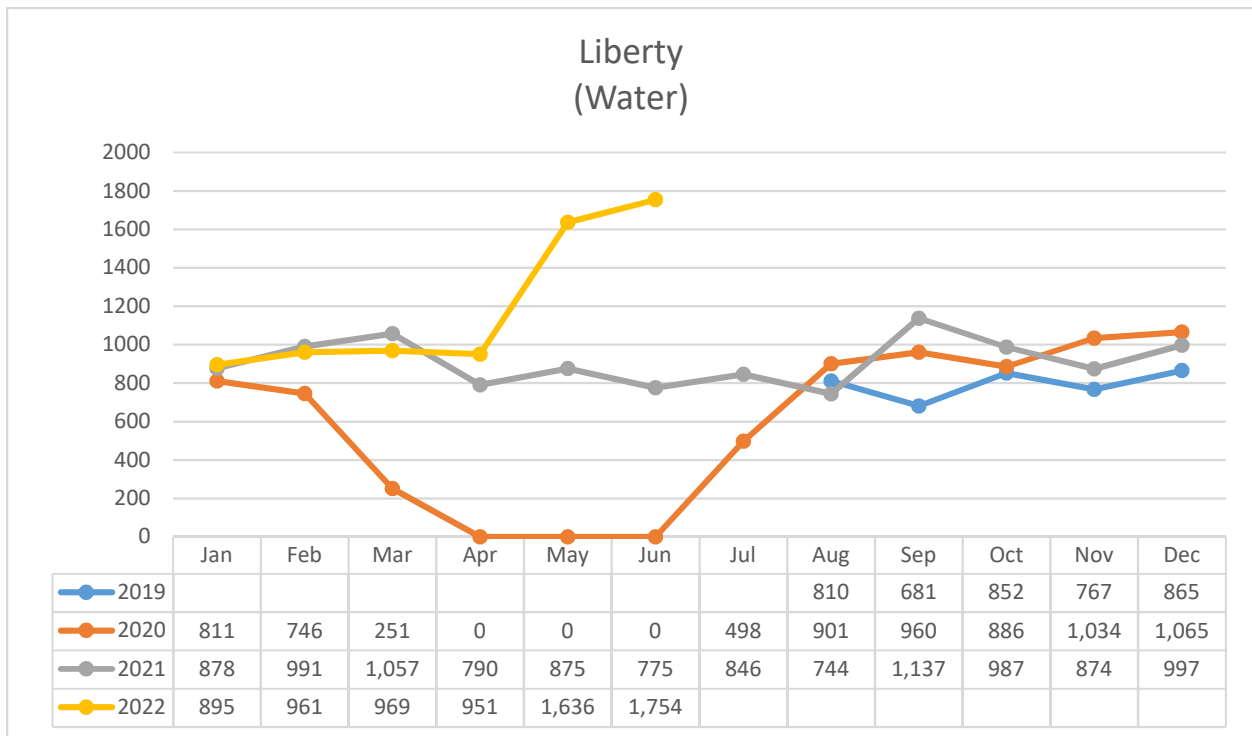
**Question 1 (Liberty - Water)**

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



As shown in the previous graph, Liberty performed 87% fewer disconnections for non-payment in March 2022 versus March 2021, 53% fewer in April 2022 versus April 2021, 44% more in May 2022 versus May 2021, and 22% more in June 2022 versus June 2021. There were approximately 73% fewer disconnections for non-payment in March 2022 compared to February 2022, 450% more in April 2022 compared to March 2022, 77% more in May 2022 compared to April 2022, and 44% fewer in June 2022 compared to May 2022. The projected number of disconnections by Liberty for March 2022 was not provided. There were 46% fewer actual disconnections by Liberty than projected in April 2022, 86% more in May 2022, and 83% more in June 2022.

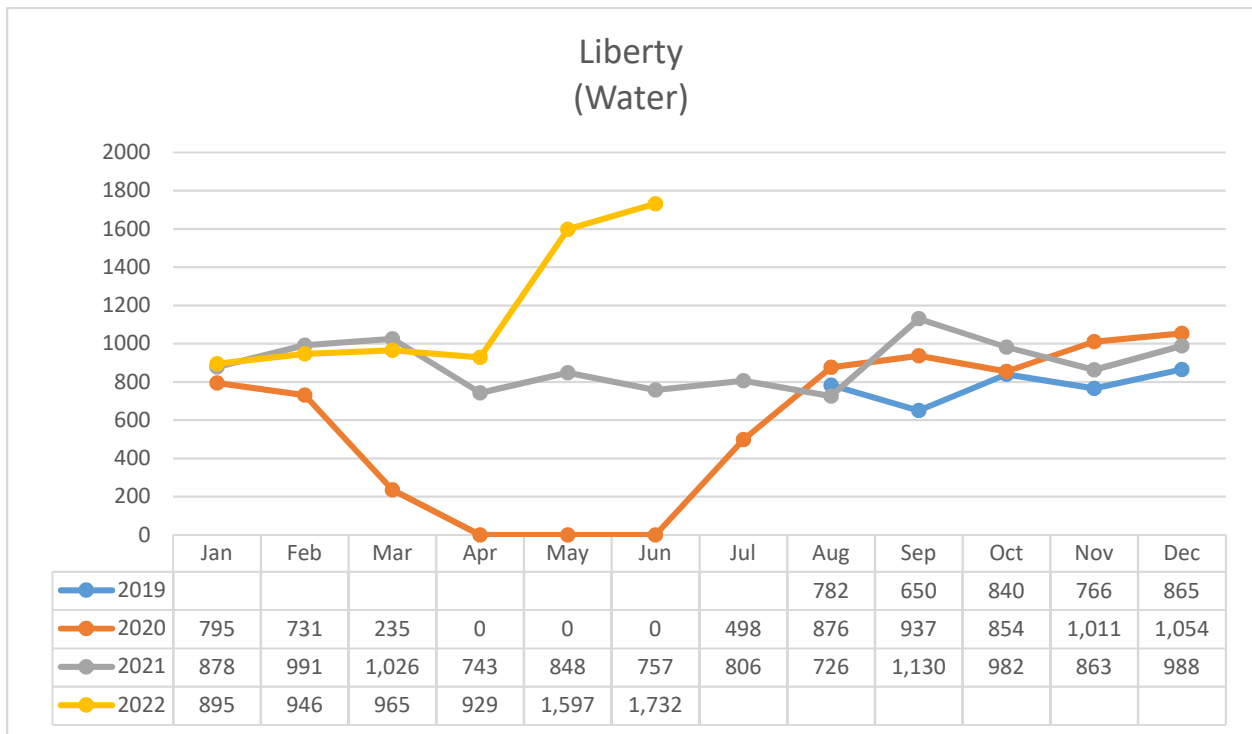
**b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”**



The previous data indicates that there were 8% fewer Liberty customers with past-due accounts in March 2022 versus March 2021, 20% more in April 2022 versus April 2021, 87% more in May 2022 versus May 2021, and 126% more in June 2022 versus June 2021. There were approximately 1% more customers with past-due accounts in March 2022 compared to February 2022, 2% fewer in April 2022 compared to March 2022, 72% more in May 2022 compared to April 2022, and 7% more in June 2022 compared to May 2022. Liberty reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement due date.

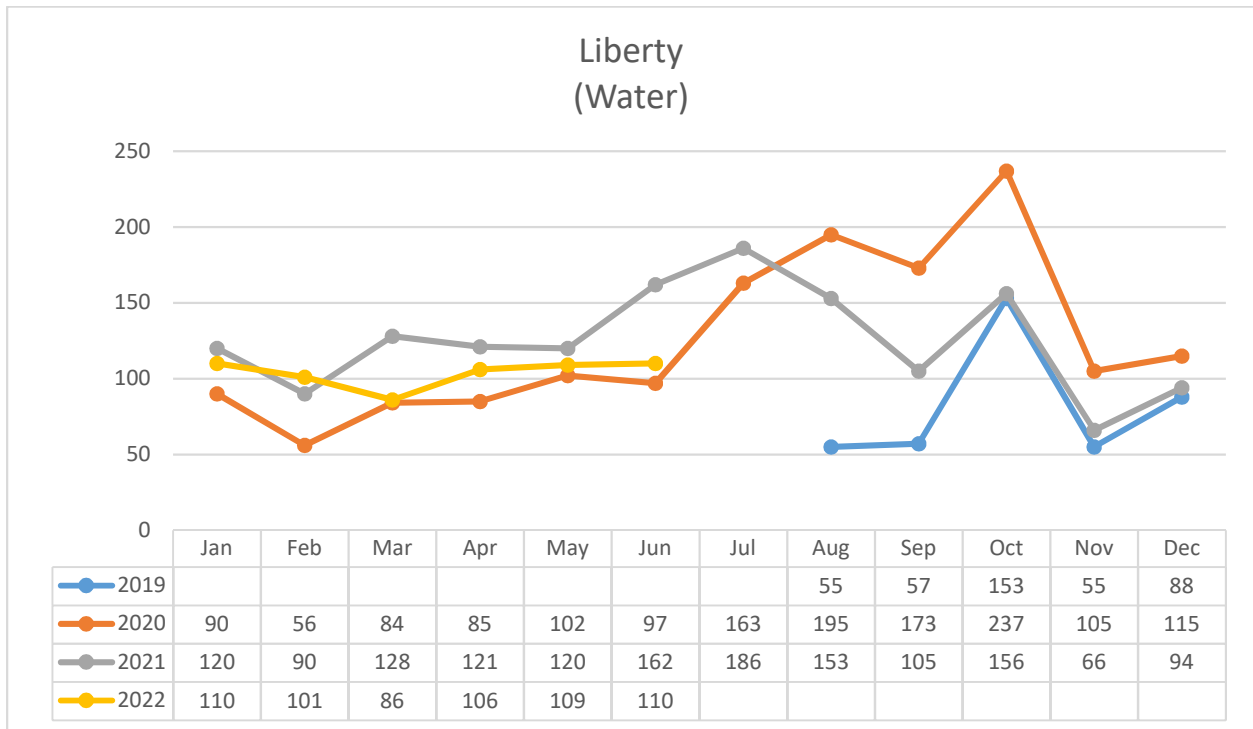


**c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end**



As shown by Liberty’s data, for those customers who received a final disconnection notice there were 6% fewer customers who were not disconnected in March 2022 versus March 2021, 25% more in April 2022 versus April 2021, 88% more in May 2022 versus May 2021, and 129% more in June 2022 versus June 2021. There were approximately 2% more customers who received a final disconnection in March 2022 compared to February 2022, 4% fewer in April 2022 compared to March 2022, 72% more in May 2022 compared to April 2022, and 8% more in June 2022 compared to May 2022.

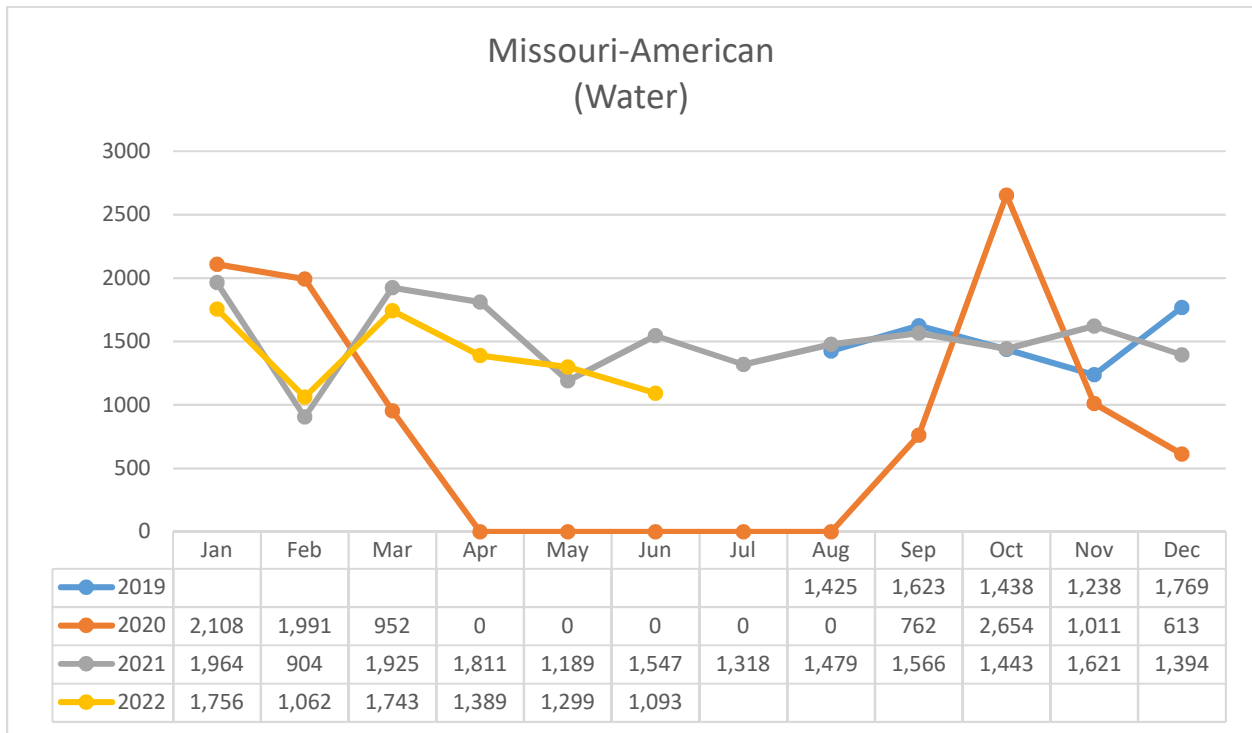
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 33% fewer Liberty customers who participated in payment plans in March 2022 versus March 2021, 12% fewer in April 2022 versus April 2021, 9% fewer in May 2022 versus May 2021, and 32% fewer in June 2022 versus June 2021. There were about 15% fewer customers who participated in payment plans in March 2022 compared to February 2022, 23% more in April 2022 compared to March 2022, 3% more in May 2022 compared to April 2022, and 1% more in June 2022 compared to May 2022.

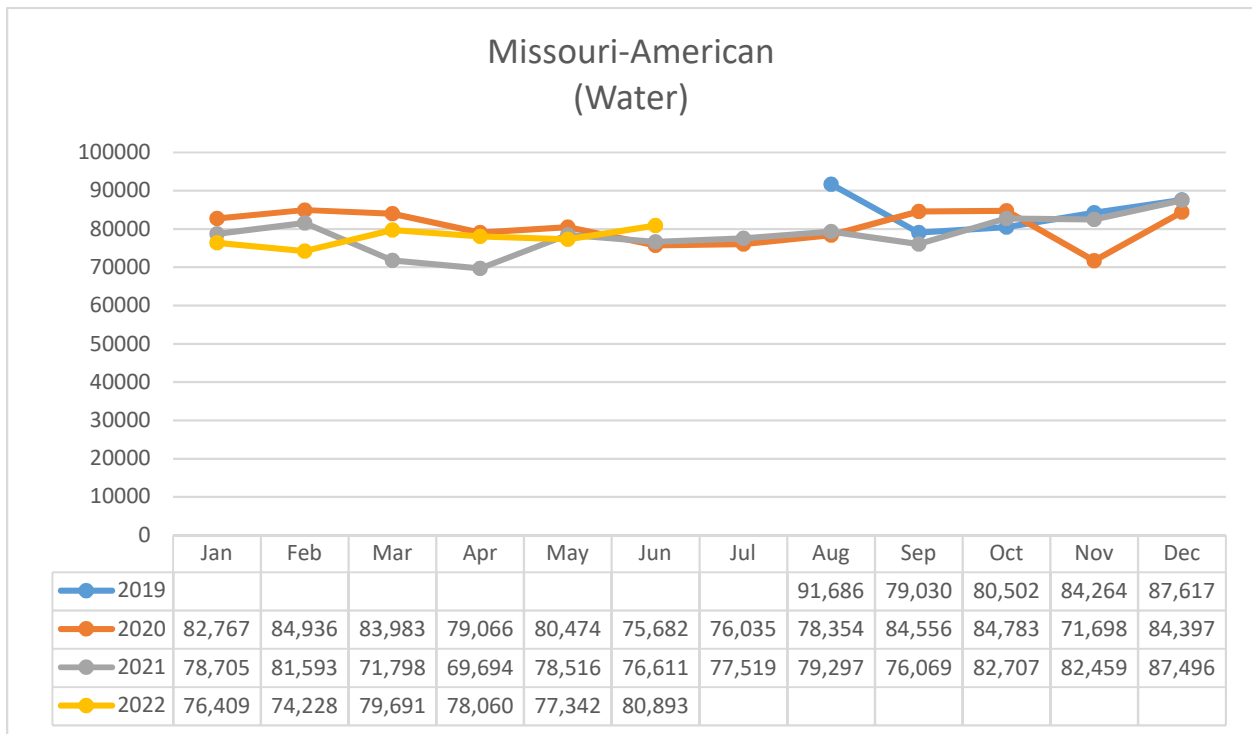
**Question 1 (Missouri-American - Water)**

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



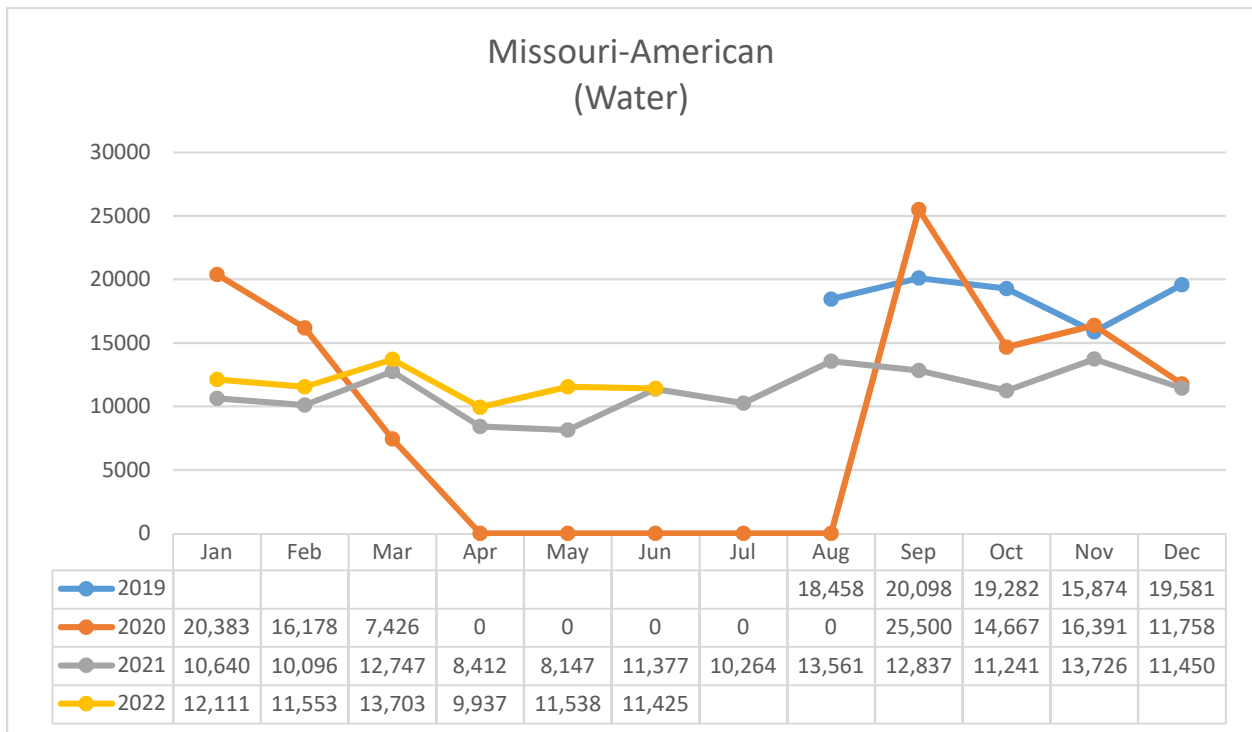
As shown in the previous graph, Missouri-American performed about 9% fewer disconnections for non-payment in March 2022 versus March 2021, 23% fewer in April 2022 versus April 2021, 9% more in May 2022 versus May 2021, and 29% fewer in June 2022 versus June 2021. There were about 64% more disconnections for non-payment in March 2022 compared to February 2022, 20% fewer in April 2022 compared to March 2022, 6% fewer in May 2022 compared to April 2022, and 16% fewer in June 2022 compared to May 2022. 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”**



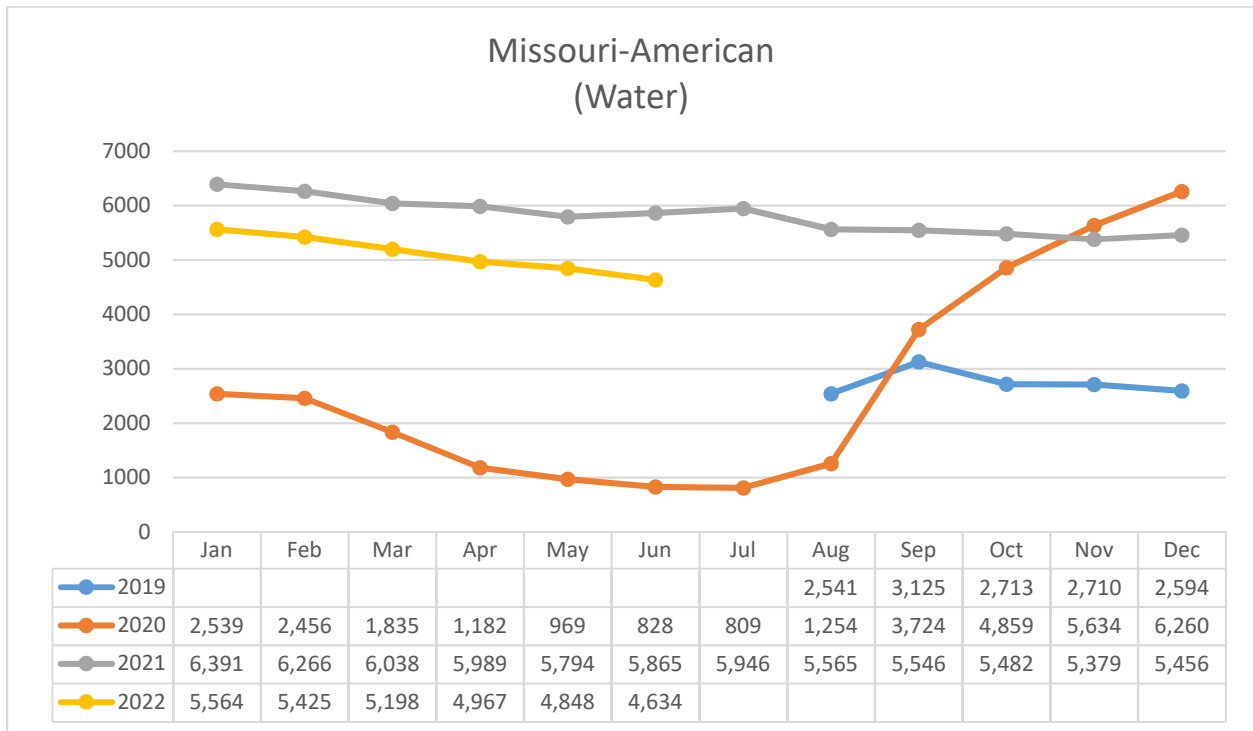
The previous data indicates that there were about 11% more Missouri-American customers with past-due accounts in March 2022 versus March 2021, 12% more in April 2022 versus April 2021, 1% fewer in May 2022 versus May 2021, and 6% more in June 2022 versus June 2021. There were approximately 7% more customers with past-due accounts in March 2022 compared to February 2022, 2% fewer in April 2022 compared to March 2022, 1% fewer in May 2022 compared to April 2022, and 5% more in June 2022 compared to May 2022. 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 7% more customers who were not disconnected in March 2022 versus March 2021, 18% more in April 2022 versus April 2021, 42% more in May 2022 versus May 2021, and less than 1% more in June 2022 versus June 2021. There were approximately 19% more customers who received a final disconnection notice in March 2022 compared to February 2022, 27% fewer in April 2022 compared to March 2022, 16% more in May 2022 compared to April 2022, and 1% fewer in June 2022 compared to May 2022.

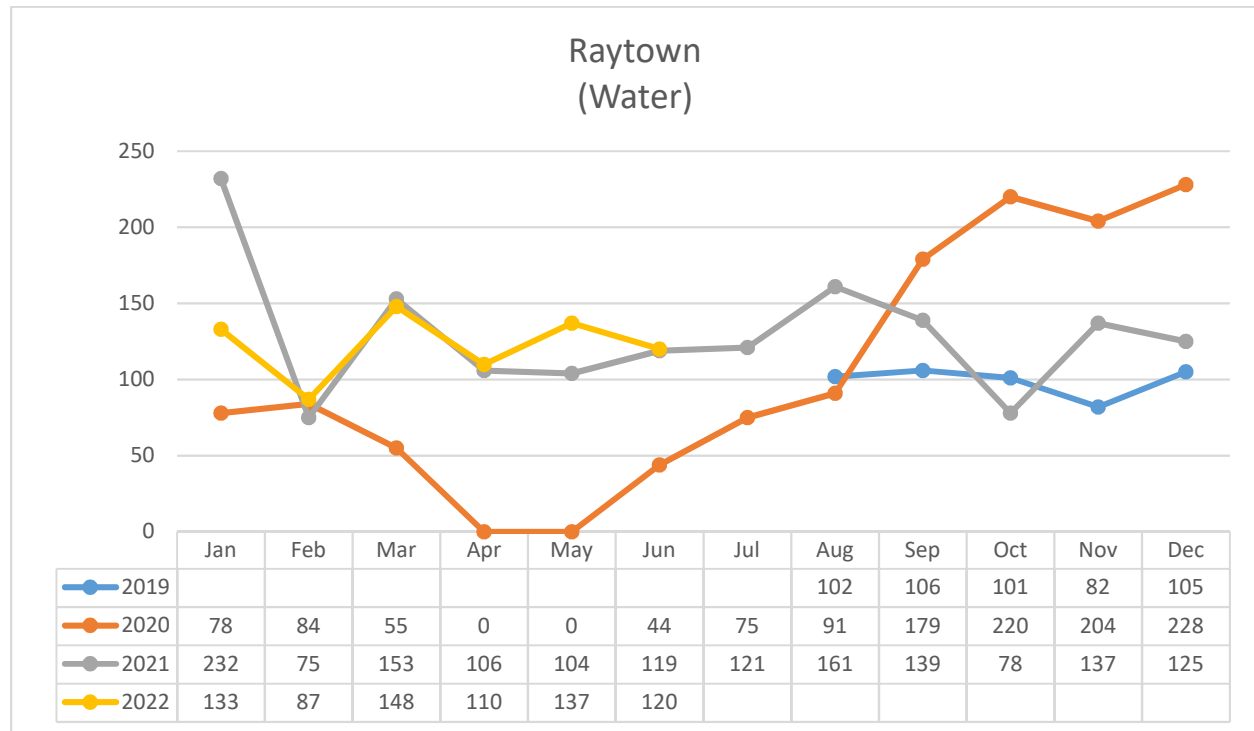
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 14% fewer Missouri-American customers who participated in payment plans in March 2022 versus March 2021, 17% fewer in April 2022 versus April 2021, 16% fewer in May 2022 versus May 2021, and 21% fewer in June 2022 versus June 2021. There were 4% fewer customers who participated in payment plans in March 2022 compared to February 2022, 4% fewer in April 2022 compared to March 2022, 2% fewer in May 2022 compared to April 2022, and 4% fewer in June 2022 compared to May 2022.

**Question 1 (Raytown Water)**

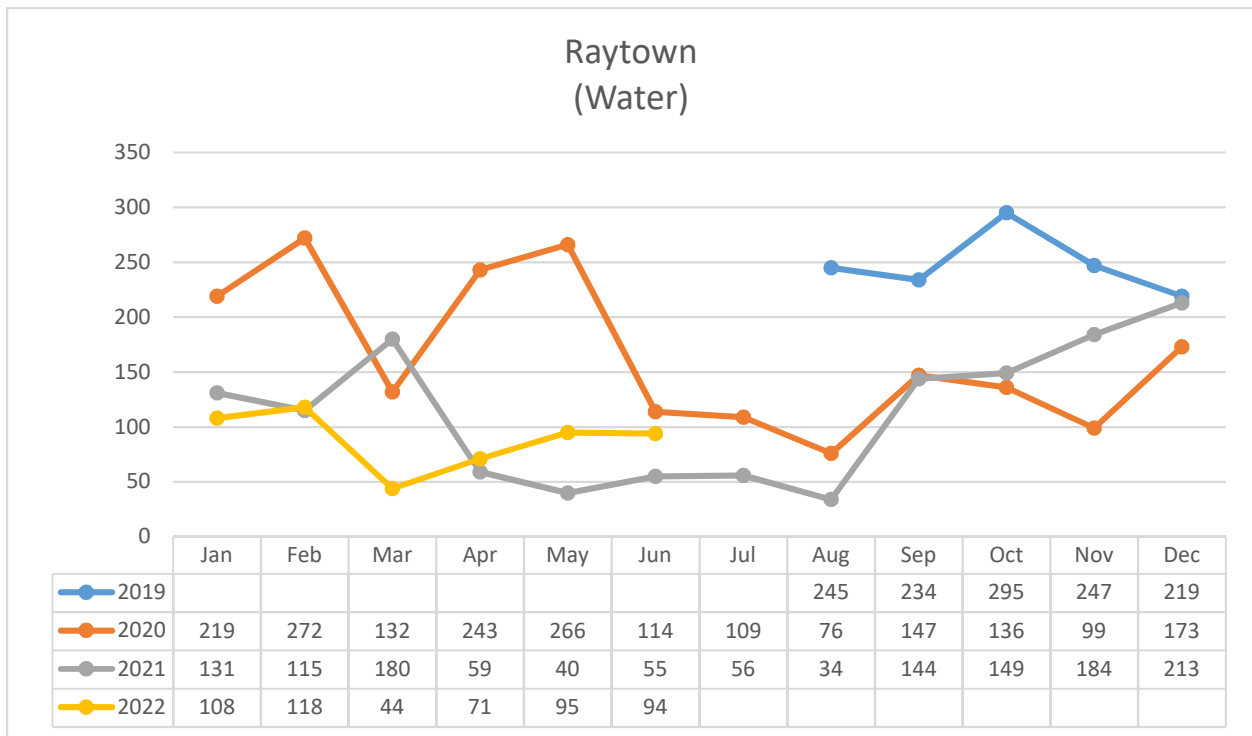
**a) The number of disconnections for non-payment of services as of each month-end<sup>7</sup>**



As shown in the previous graph, Raytown Water performed approximately 3% fewer disconnections for non-payment in March 2022 versus March 2021, 4% more in April 2022 versus April 2021, 32% more in May 2022 versus May 2021, and 1% more in June 2022 versus June 2021. There were 70% more disconnections for non-payment in March 2022 compared to February 2022, 26% fewer in April 2022 compared to March 2022, 25% more in May 2022 compared to April 2022, and 12% fewer in June 2022 compared to May 2022. The projected number of disconnections by Raytown Water was not provided for March 2022 or April 2022. The actual number of disconnections in May 2022 was approximately 17% above the number projected by Raytown Water for the same month and 8% below in June 2022.

<sup>7</sup> Disconnection data changed from previous month response. Number updated and correspondence sent regarding an explanation. Nothing received as of the date of the report.

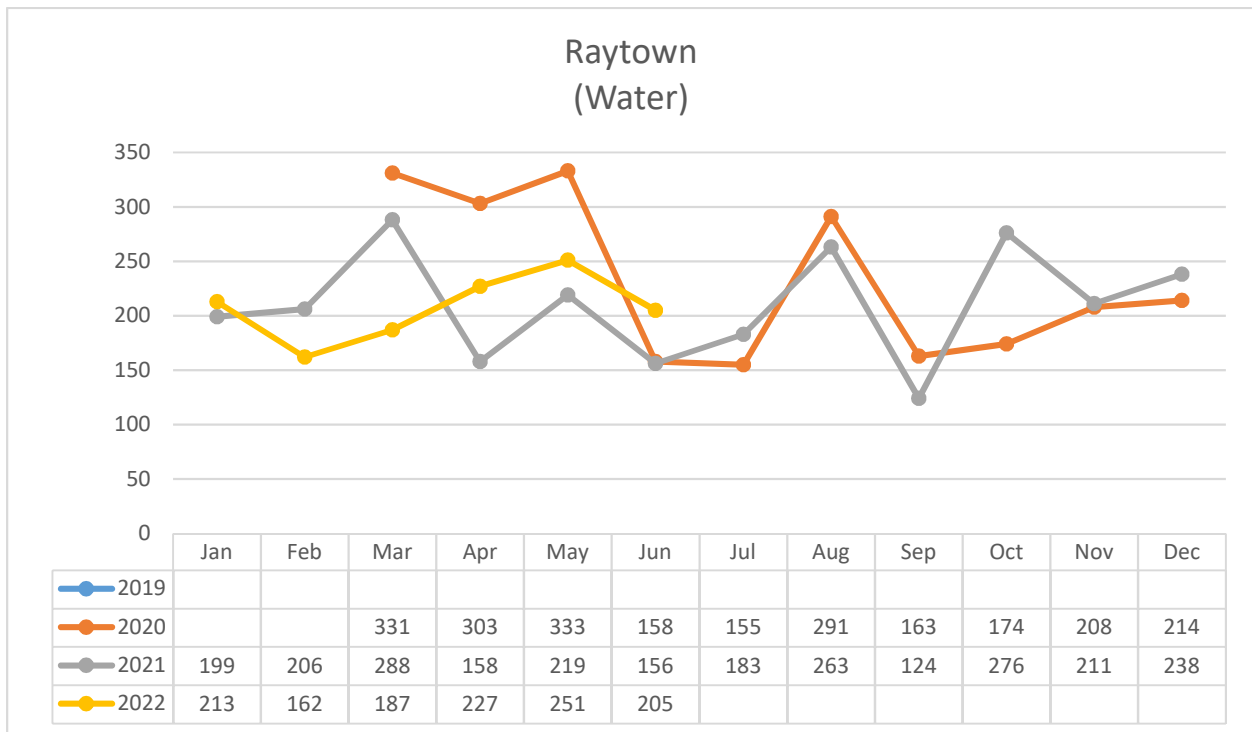
b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”



The previous data indicates that there were 76% fewer Raytown Water customers with past-due accounts in March 2022 versus March 2021, 20% more in April 2022 versus April 2021, 138% more in May 2022 versus May 2021, and 71% more in June 2022 versus June 2021. There were 63% fewer customers with past-due accounts in March 2022 compared to February 2022, 61% more in April 2022 compared to March 2022, 34% more in May 2022 compared to April 2022, and 1% fewer in June 2022 compared to May 2022. Raytown Water reported that it defines “past due” as accounts with balances that are over 31 days.

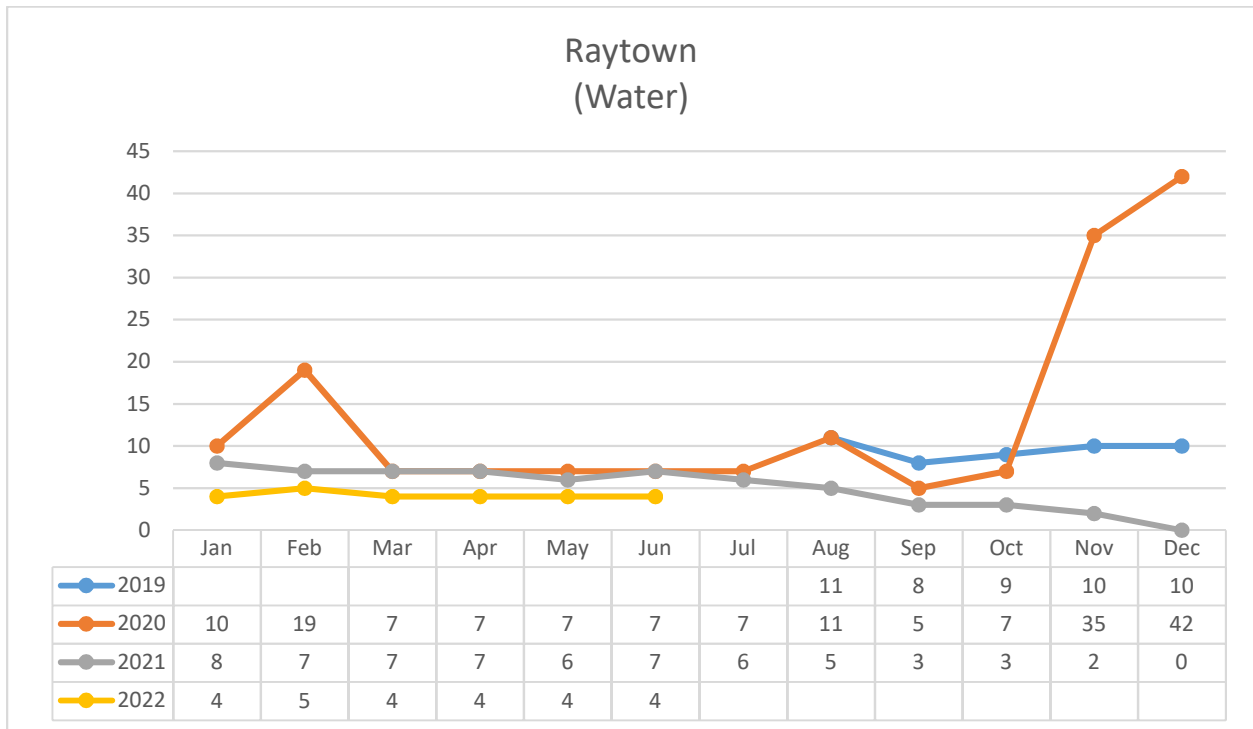


**c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end**



As shown by Raytown Water’s data, for those customers who received a final disconnection notice there were approximately 35% fewer customers who were not disconnected in March 2022 versus March 2021, 44% more in April 2022 versus April 2021, 15% more in May 2022 versus May 2021, and 31% more in June 2022 versus June 2021. There were approximately 15% more customers who received a final disconnection notice in March 2022 compared to February 2022, 21% more in April 2022 compared to March 2022, 11% more in May 2022 compared to April 2022, and 18% fewer in June 2022 compared to May 2022.

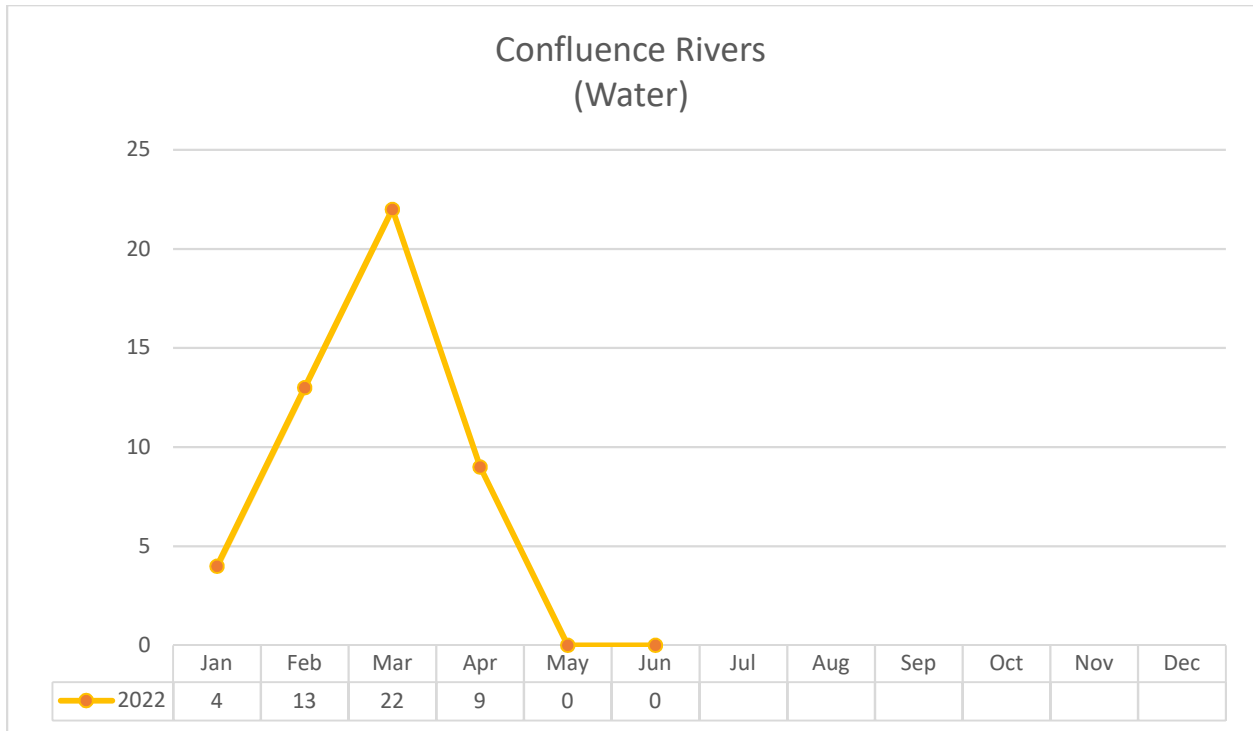
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were 43% fewer customers of Raytown Water who participated in payment plans in March 2022 versus March 2021, 43% fewer in April 2022 versus April 2021, 33% fewer in May 2022 versus May 2021, and 43% fewer in June 2022 versus June 2021. There was 1 less customer participating in a payment plan in March 2022 compared to February 2022, the same number of customers participated in a payment plan for April 2022, May 2022, and June 2022.

**Question 1 (Confluence Rivers - Water)<sup>8</sup>**

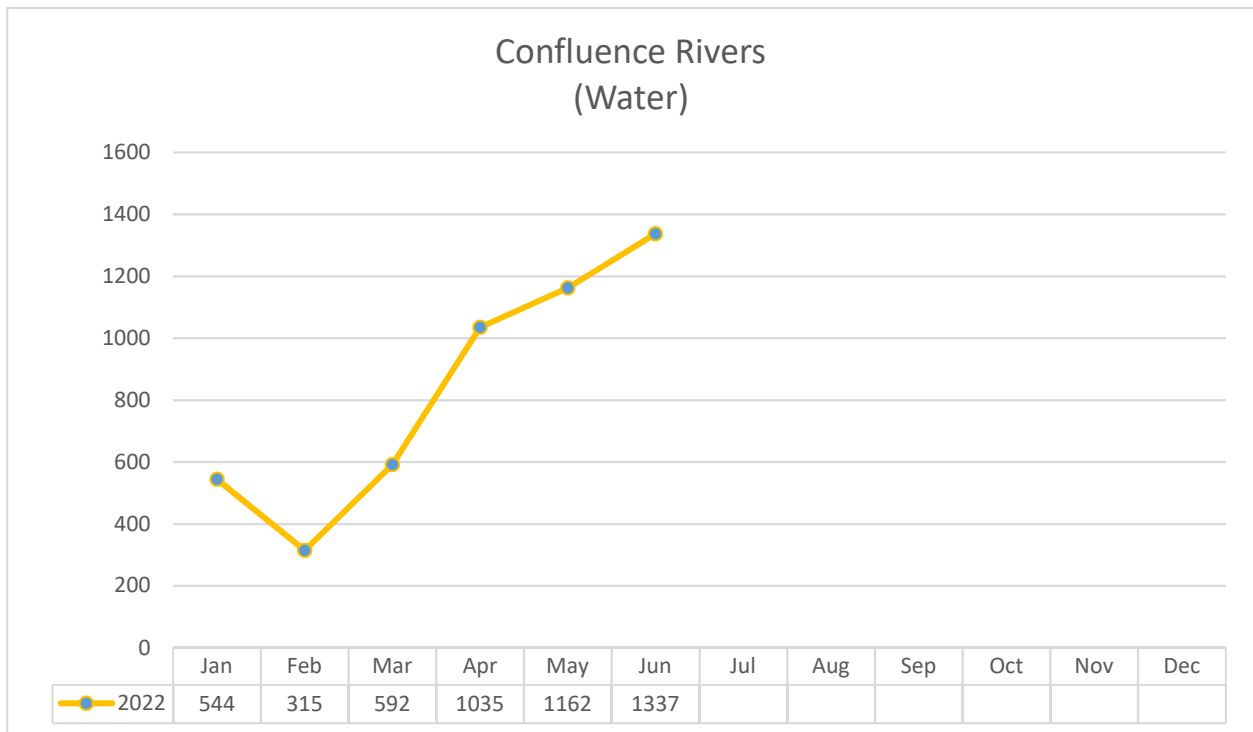
**a) The number of disconnections for non-payment of services as of each month-end**



As shown in the previous graph, Confluence Rivers performed 22 disconnections in March 2022, 9 in April 2022, 0 in May 2022, and 0 in June 2022. Their projected number of disconnections for each of these months was 15.

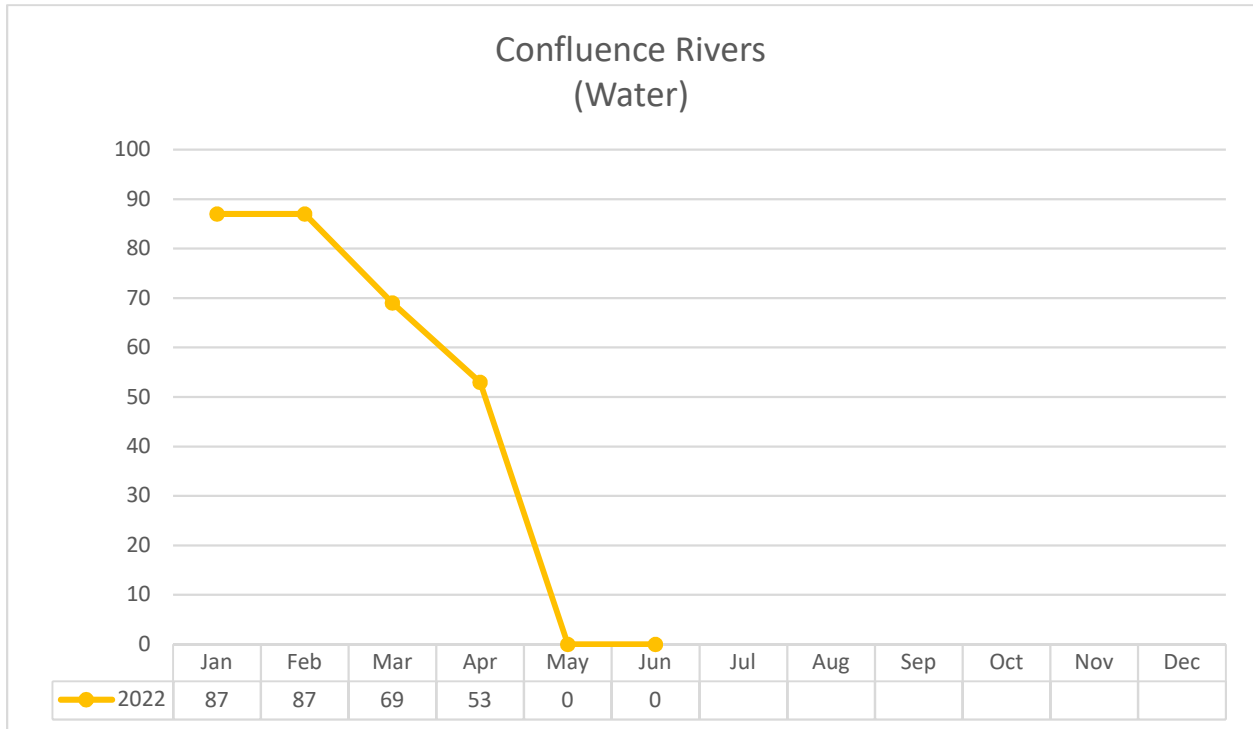
<sup>8</sup> Per Response to Staff Data Request No. 0011.2, Confluence Rivers has adopted a new customer billing platform and, as such, has suspended shut offs and late fees for the time being.

**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”**



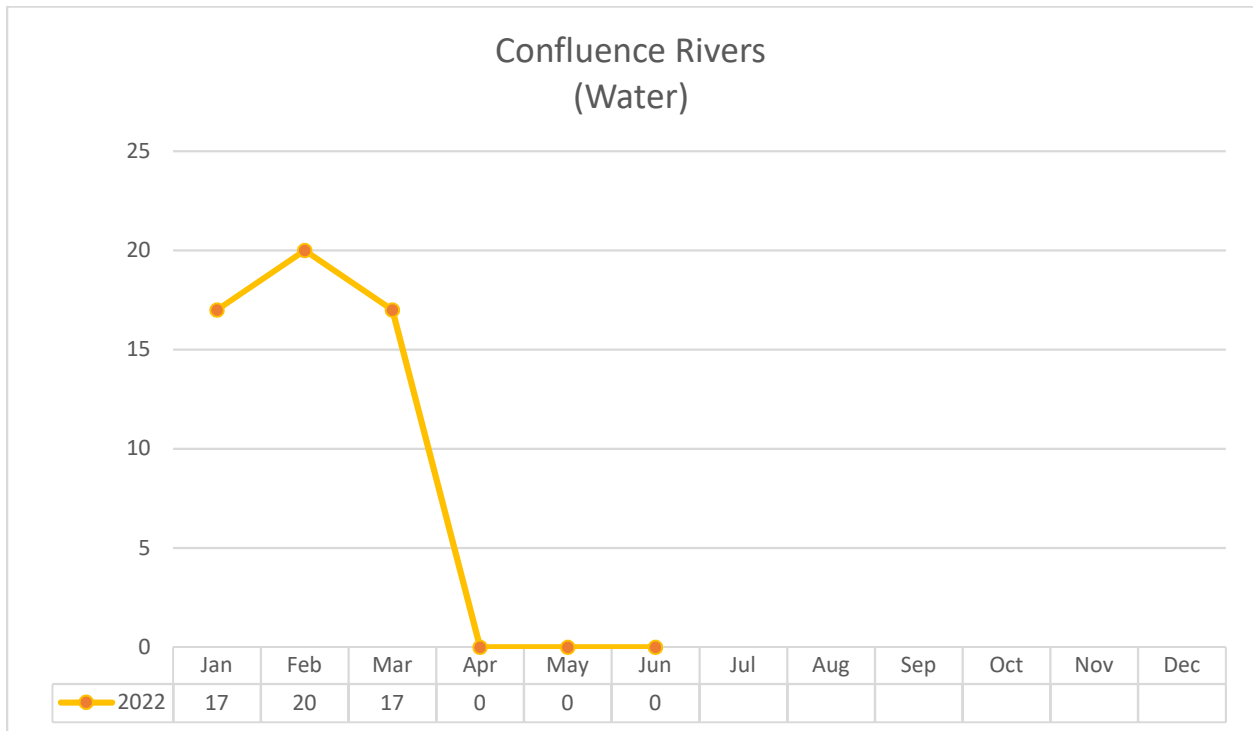
The previous data indicates there were 88% more Confluence Rivers’ customers with past-due accounts in March 2022 compared to February 2022, 75% more in April 2022 compared to March 2022, 12% more in May 2022 compared to April 2022, and 15% more in June 2022 compared to May 2022. Confluence Rivers reported that it defines “past-due” as any account that is over \$25 and is 30 or more days past the due date published on the 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 Confluence Rivers’ data, there were 69 customers who received a final disconnection notice but were not disconnected for non-payment of service in March 2022, 53 in April 2022, 0 in May 2022, and 0 in June 2022. There were 21% fewer customers who received a final disconnection notice in March 2022 compared to February 2022, 23% fewer in April 2022 compared to March 2022. There were 0 customers who received a final disconnection notice in both May 2022 and June 2022.

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



The previous graph illustrates that there were 17 Confluence Rivers’ customers who participated in payment plans in March 2022 and 0 in April 2022, May 2022, and June 2022. There were 15% fewer customers who participated in a payment plan in March 2022 compared to February 2022.

**Question 2**

**Please provide your Company’s estimate of the number of disconnections for non-payment of services for the ten month period of March 2022 through December 2022.**

**Ameren Missouri (Electric)**

3/2022	4/2022	5/2022	6/2022	7/2022	8/2022	9/2022	10/2022	11/2022	12/2022
NA	NA	NA	7,310	7,737	11,241	10,723	11,832	4,153	2,707

**Empire (Electric)**

3/2022	4/2022	5/2022	6/2022	7/2022	8/2022	9/2022	10/2022	11/2022	12/2022
NA	642	401	417	261	316	247	139	147	68

**Evergy Metro (Electric)**

3/2022	4/2022	5/2022	6/2022	7/2022	8/2022	9/2022	10/2022	11/2022	12/2022
800	1,400	1,500	1,600	1,600	2,500	2,500	2,000		

**Evergy West (Electric)**

3/2022	4/2022	5/2022	6/2022	7/2022	8/2022	9/2022	10/2022	11/2022	12/2022
500	730	1,000	1,100	1,200	1,200	1,200	1,000		

**Ameren Missouri (Gas)**

3/2022	4/2022	5/2022	6/2022	7/2022	8/2022	9/2022	10/2022	11/2022	12/2022
NA	NA	NA	266	190	187	142	104	16	22

**Spire (Gas)**

3/2022	4/2022	5/2022	6/2022	7/2022	8/2022	9/2022	10/2022	11/2022	12/2022
NA	4,950	10,685	9,987	8,482	5,688	4,779	4,676	1,209	1,092

**Summit (Gas)**

3/2022	4/2022	5/2022	6/2022	7/2022	8/2022	9/2022	10/2022	11/2022	12/2022
88	124	64	87	77	42	24	28	17	14

**Empire (Gas)**

3/2022	4/2022	5/2022	6/2022	7/2022	8/2022	9/2022	10/2022	11/2022	12/2022
71	277	259	340	235	349	92	71	18	4

**Liberty (MNG) (Gas)**

3/2022	4/2022	5/2022	6/2022	7/2022	8/2022	9/2022	10/2022	11/2022	12/2022
502	800	800	700	700	400	400	400	300	100

**Liberty (Water)**

3/2022	4/2022	5/2022	6/2022	7/2022	8/2022	9/2022	10/2022	11/2022	12/2022
4	41	21	12	35	13	3	3	17	10

**Missouri-American (Water)**

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

**Raytown Water**

3/2022	4/2022	5/2022	6/2022	7/2022	8/2022	9/2022	10/2022	11/2022	12/2022
148	110	117	130	133	177	150	143	147	137

**Confluence Rivers (Water)**

3/2022	4/2022	5/2022	6/2022	7/2022	8/2022	9/2022	10/2022	11/2022	12/2022
15	15	15	15	15	15	15	15	15	15