

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

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

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

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”) and for its *Staff Report on Utility Data Request Responses* 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* (“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. 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.

5. Staff also supplemented its DRs to request that utilities provide monthly information from March through July 2020 to continue to compare disconnect data from a yearly perspective.

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 October, November, and December 2022, is due to the Commission by January 31, 2023.

## **REQUEST FOR COMMISSION ORDER**

10. Staff has filed a report on disconnect data since August 2020.

11. The state of Missouri considers the COVID-19 pandemic over.<sup>1</sup>

12. If the Commission wishes for Staff to continue this reporting, Staff respectfully requests an order from the Commission setting a timeline for the filing of further reports in this matter.

**WHEREFORE**, Staff respectfully submits its report for the Commission's knowledge and consideration, and respectfully requests a Commission order setting a timeline for the filing of further reports in this matter.

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 31<sup>st</sup> day of January, 2023.

**/s/ Ron Irving**

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<sup>1</sup> On March 30, 2022, Governor Parson announced in a press conference the end of the COVID-19 crisis in Missouri and will begin the endemic phase of the pandemic on April 1, 2022.

# 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 31, 2023

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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 the Staff of the Missouri Public Service Commission (“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 began 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 October, November, and December 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"), 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”), The Raytown Water Company (“Raytown Water”) and Confluence Rivers Utility Operating Company, Inc. (“Confluence Rivers - Water”).

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 December 2022 (yellow dots and line). This method of presentation will allow for a direct comparison of the reported information from August 2019 to December 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 December 2022 compared to November 2022).

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

For question 1a, all but three of the utilities reported decreases in the number of customer disconnections in the 4th quarter of 2022 compared to the 3rd quarter of 2022. Two utilities experienced the lowest number of customer disconnections in one quarter since September 2019 and one utility experience the highest number of customer disconnections for this same time period. All but four utilities reported in increase in customer disconnections for the 4th quarter of 2022 as compared to the 4th quarter of 2021.

For Question 1b, about the same number of utilities reported increases or decreases in the number of past-due customer accounts in the 4th quarter of 2022 compared to the 3rd quarter of 2022. One utility reported its highest number of past-due customers accounts for the 4<sup>th</sup> quarter when compared to other quarters since September 2019. About the same number of utilities reported increases and decreases in the number of past-due customer accounts in the 4th quarter of 2022 as compared to the 4th quarter of 2021.

For Question 1c, all utilities but one, reported increases in the number of customer who have received final disconnection notices but have not yet been disconnected in the 4th quarter of 2022 as compared to the 4th quarter of 2021. In Staff's last two quarterly reports, this also occurred for the 2<sup>nd</sup> and 3<sup>rd</sup> quarters of 2022 when compared to 2021. However, it should be noted that it is not the same utility reporting the decrease for all three quarters. One utility experienced its highest month of number of customers who have received final disconnection notices since this reporting began. Also, all but 4 utilities reported increases in this metric in the 4<sup>th</sup> quarter of 2022 compared to the previous quarter.

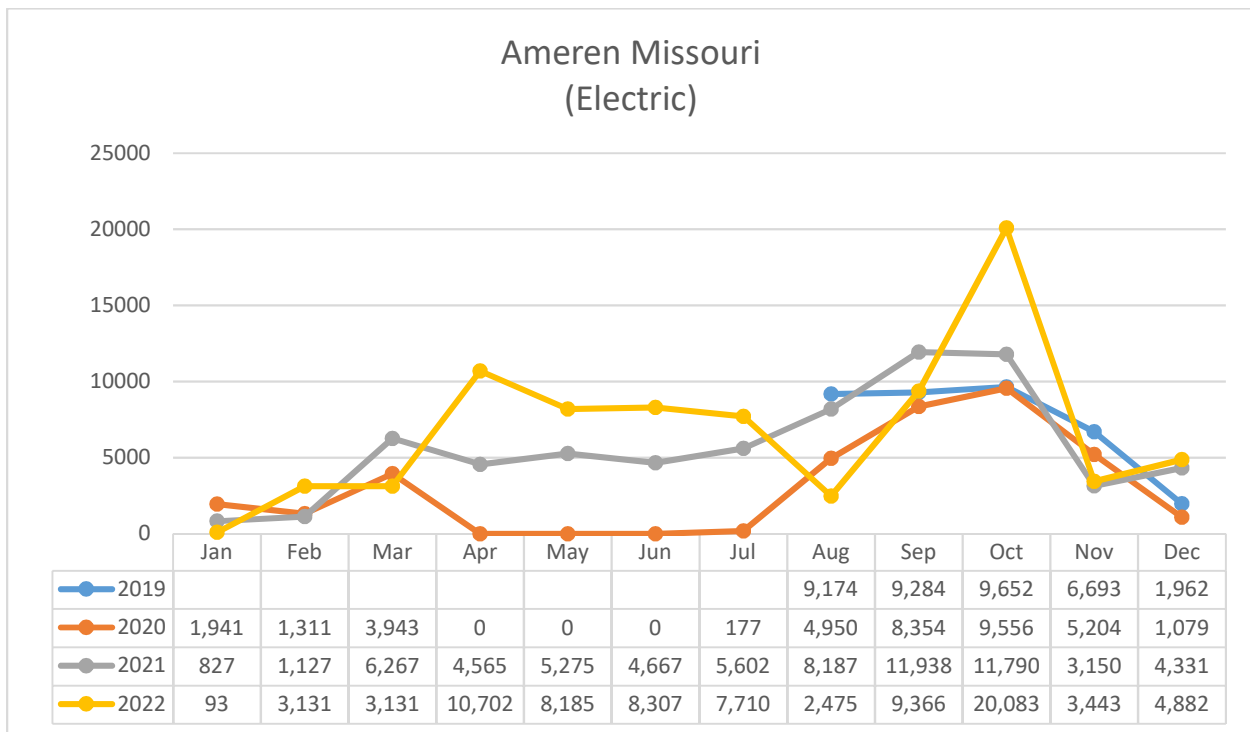
Regarding Question 1d, about the same number of utilities reported increases or decreases in the number of customers participating in payment plans in the 4th quarter of 2022 compared to

the 3rd quarter of 2022. Also, one utility reported its lowest number of customers participating in payments plans since this reporting began while another reported its highest number of customers enrolled in a payment plan. All but four utilities reported increases in the number of customers participating in payment plans in the 4<sup>th</sup> quarter of 2022 as compared to the same quarter in 2021.

**Individual Utility Responses:**

**Question 1 (Ameren Missouri – Electric)<sup>3</sup>**

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

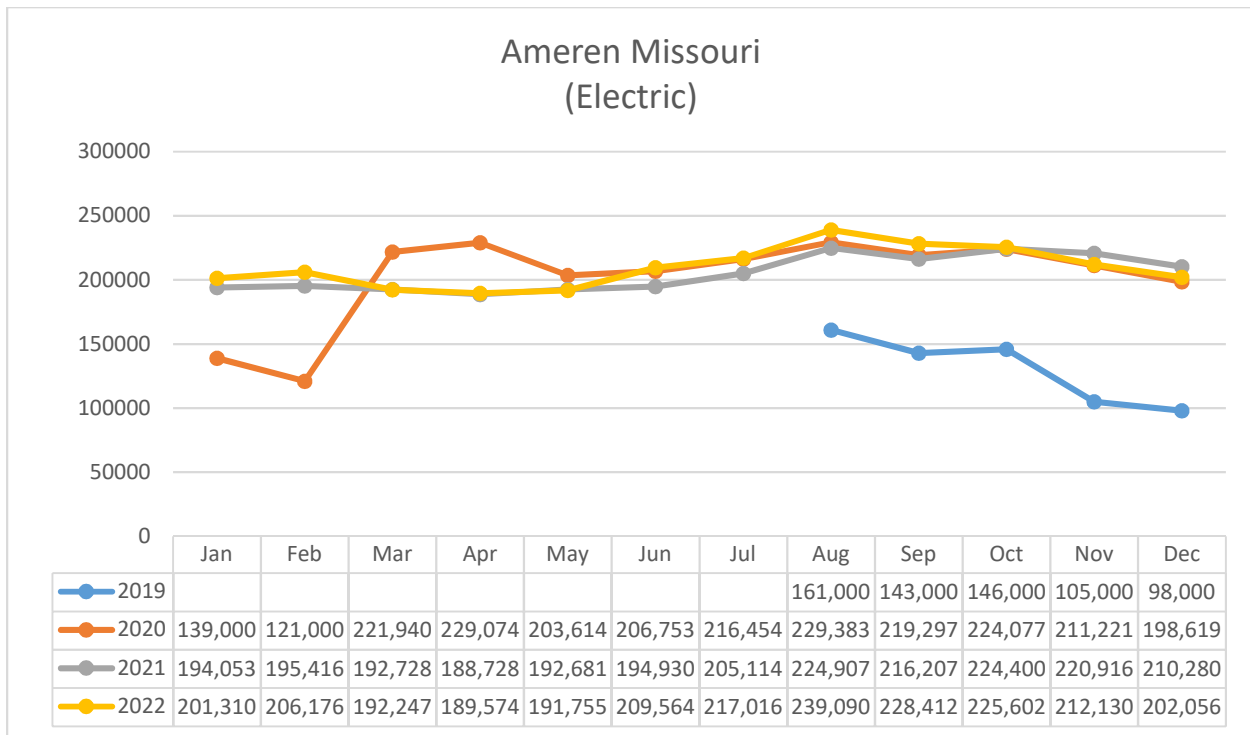


As shown in the previous graph, Ameren Missouri had 70% more disconnections for non-payment in October 2022 versus October 2021, 9% more in November 2022 versus November 2021, and 13% more in December 2022 versus December 2021. There were about 114% more disconnections for non-payment in October 2022 compared to September 2022, 83% fewer in November 2022 compared to October 2022, and 42% more in December 2022 compared to November 2022. The

<sup>3</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 2022 and the numbers will be accurate moving forward.

number of actual disconnections by Ameren Missouri in October 2022 was 70% above the amount projected by Ameren Missouri for the same month, 17% below for November 2022, and 80% above in December 2022.

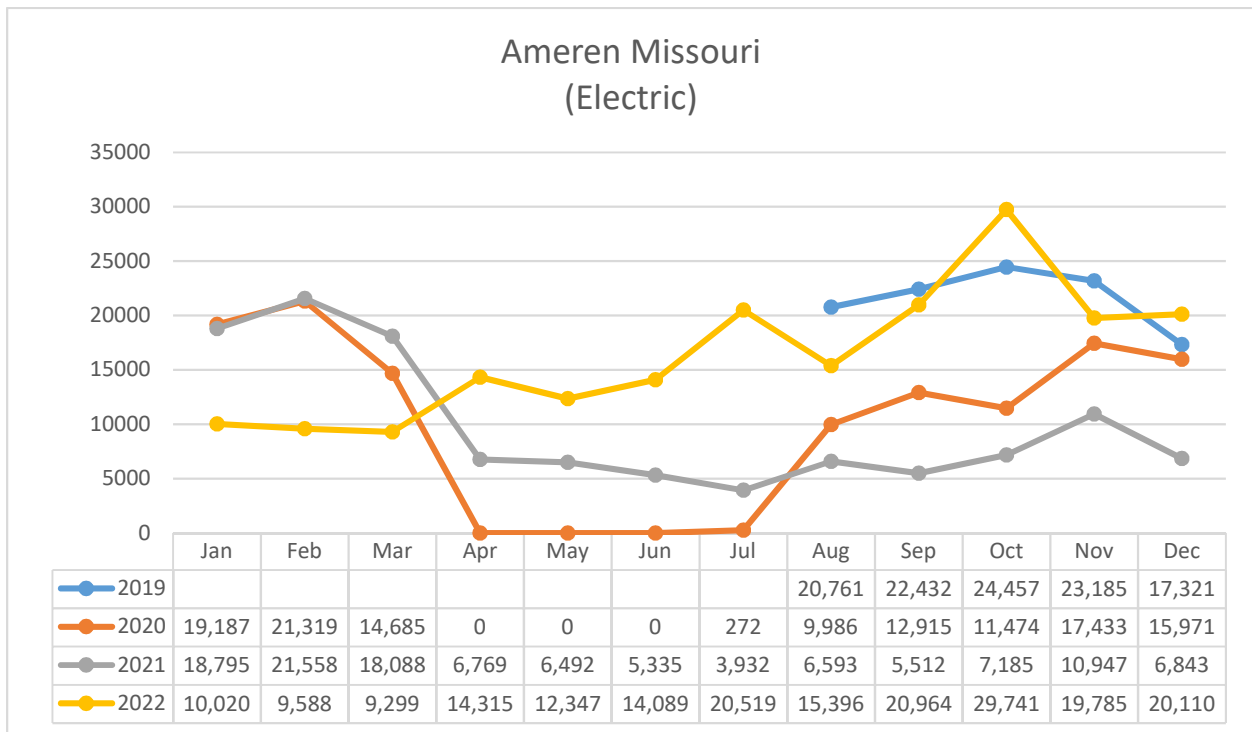
**b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”<sup>4</sup>**



The previous data indicates that there were approximately 1% more Ameren Missouri customers with past-due accounts in October 2022 versus October 2021, 4% fewer in November 2022 versus November 2021, and 4% fewer in December 2022 versus December 2021. There were 1% fewer customers with past-due accounts in October 2022 compared to September 2022, 6% fewer in November 2022 compared to October 2022, and 5% fewer in December 2022 versus November 2022. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

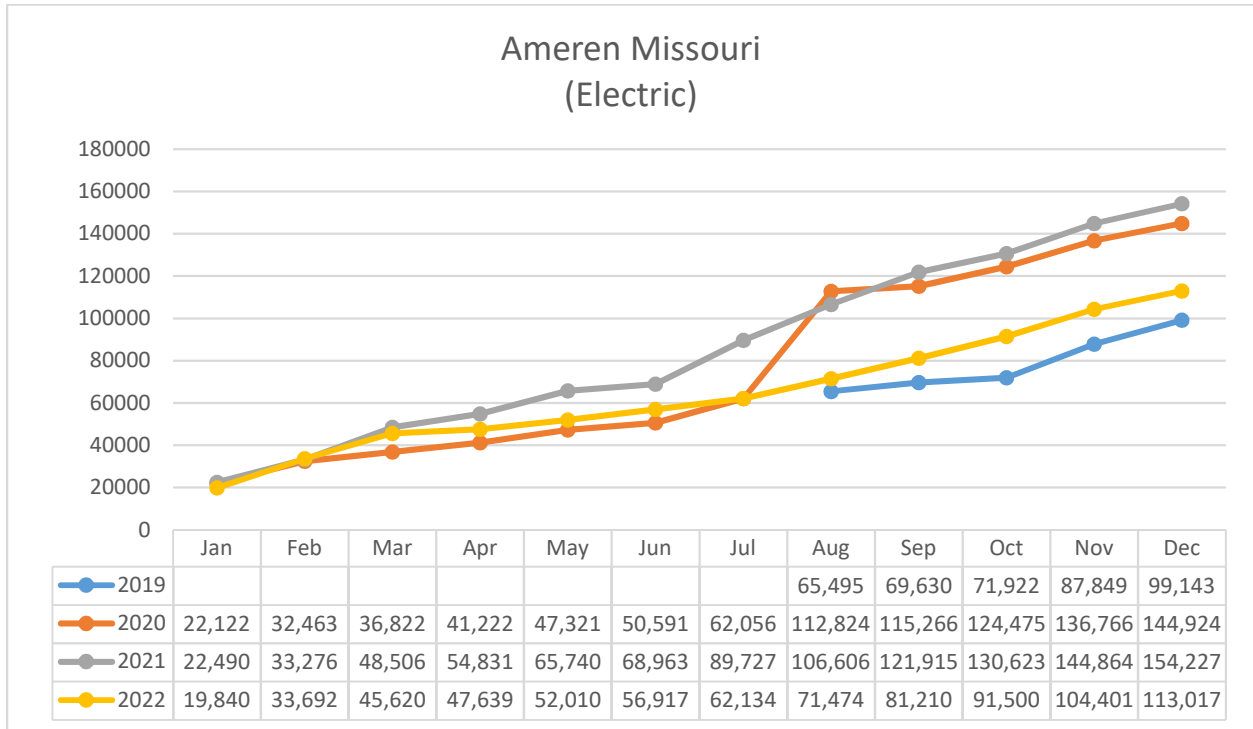
<sup>4</sup> Per Data Request Response No. 0004.1s10 from Ameren, the numbers contained in previous data request responses were updated. An adjustment was made in data point (1b) due to certain regional areas were excluded for some months. May through November numbers were updated. The numbers were reviewed for accuracy and should be accurate moving forward.

**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 314% more customers who were not disconnected in October 2022 versus October 2021, 81% more in November 2022 versus November 2021, and 194% more in December 2022 versus December 2021. There were approximately 42% more customers who received a final disconnection notice in October 2022 compared to September 2022, 33% fewer in November 2022 compared to October 2022, and 2% more in December 2022 compared to November 2022.

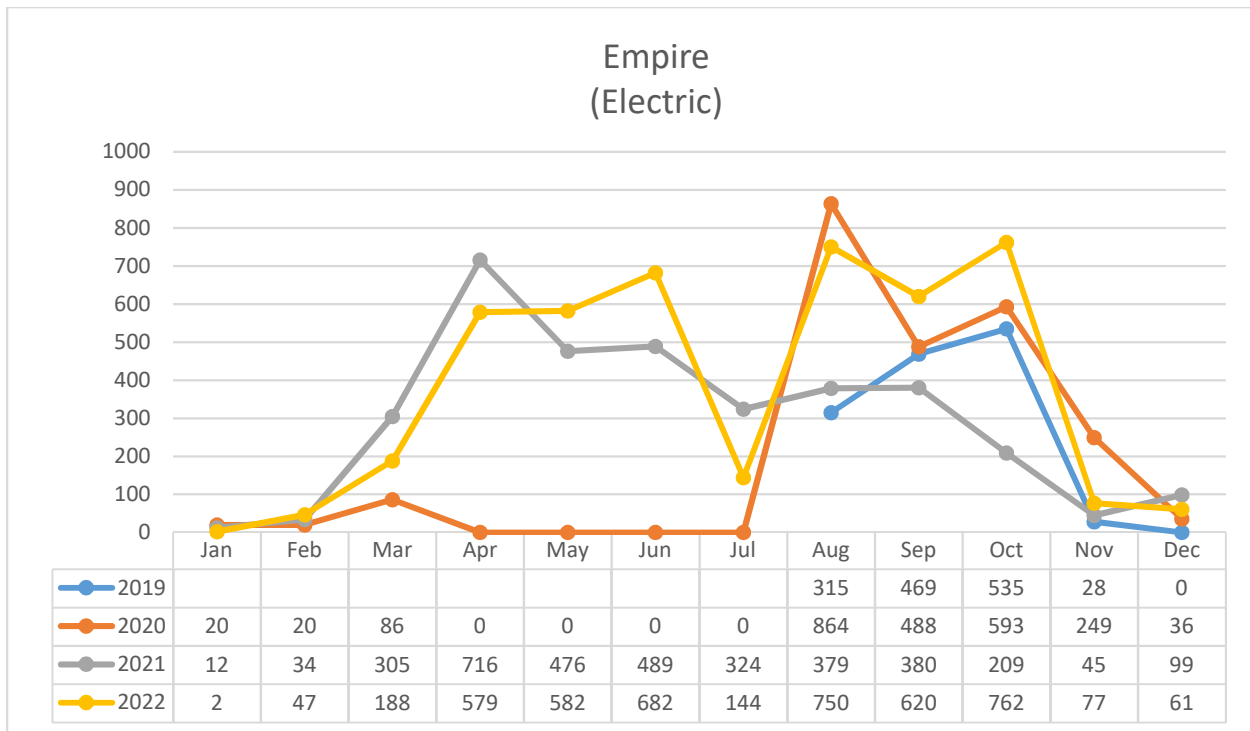
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 30% fewer Ameren Missouri customers who participated in payment plans in October 2022 versus October 2021, 28% fewer in November 2022 versus November 2021, and 27% fewer in December 2022 versus December 2021. There was 13% more customers who participated in payment plans in October 2022 compared to September 2022, 14% more in November 2022 compared to October 2022, and 8% more in December 2022 compared to November 2022.

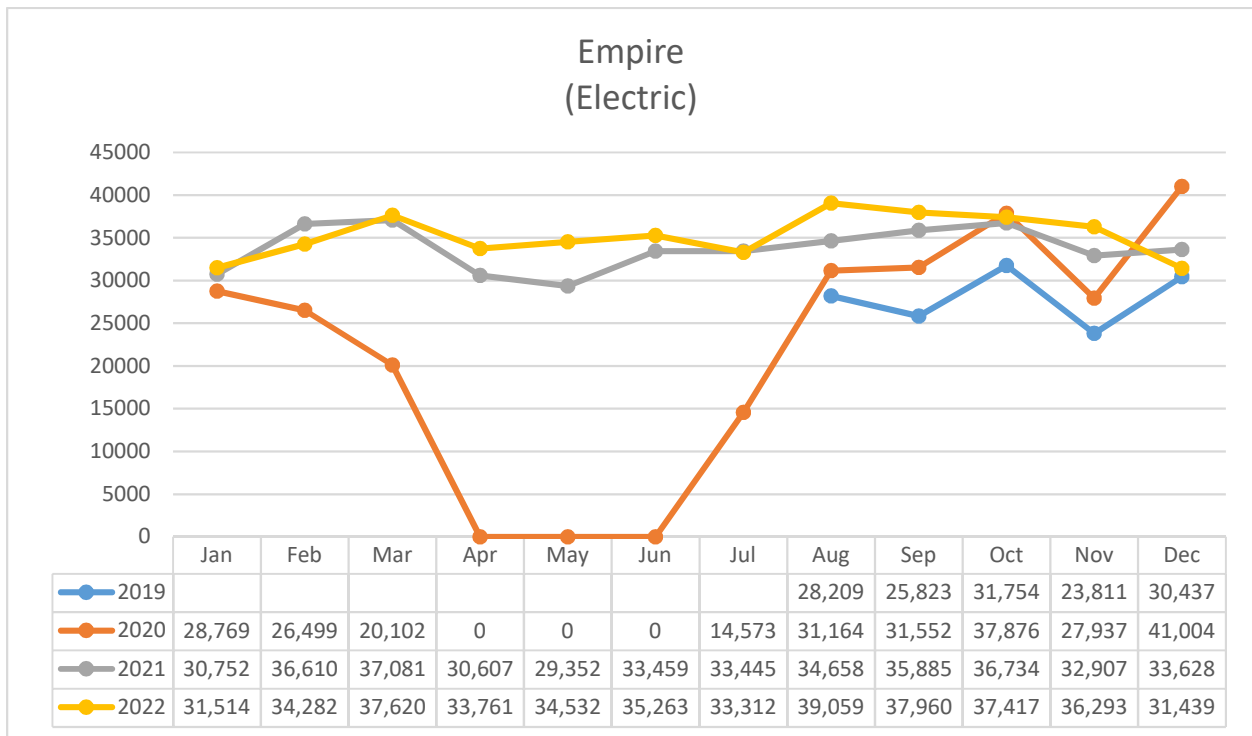
**Question 1 (Empire – Electric)**

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



As shown in the previous graph, Empire performed approximately 265% more disconnections for non-payment in October 2022 versus October 2021, 71% more in November 2022 versus November 2021, and 38% fewer in December 2022 versus December 2021. There were about 23% more disconnections for non-payment in October 2022 compared to September 2022, 90% fewer in November 2022 compared to October 2022, and 21% fewer in December 2022 compared to November 2022. The number of actual disconnections for non-payment in October 2022 was 448% above the projected number of disconnections for the same month, 48% below for November 2022, and 10% below for December 2022.

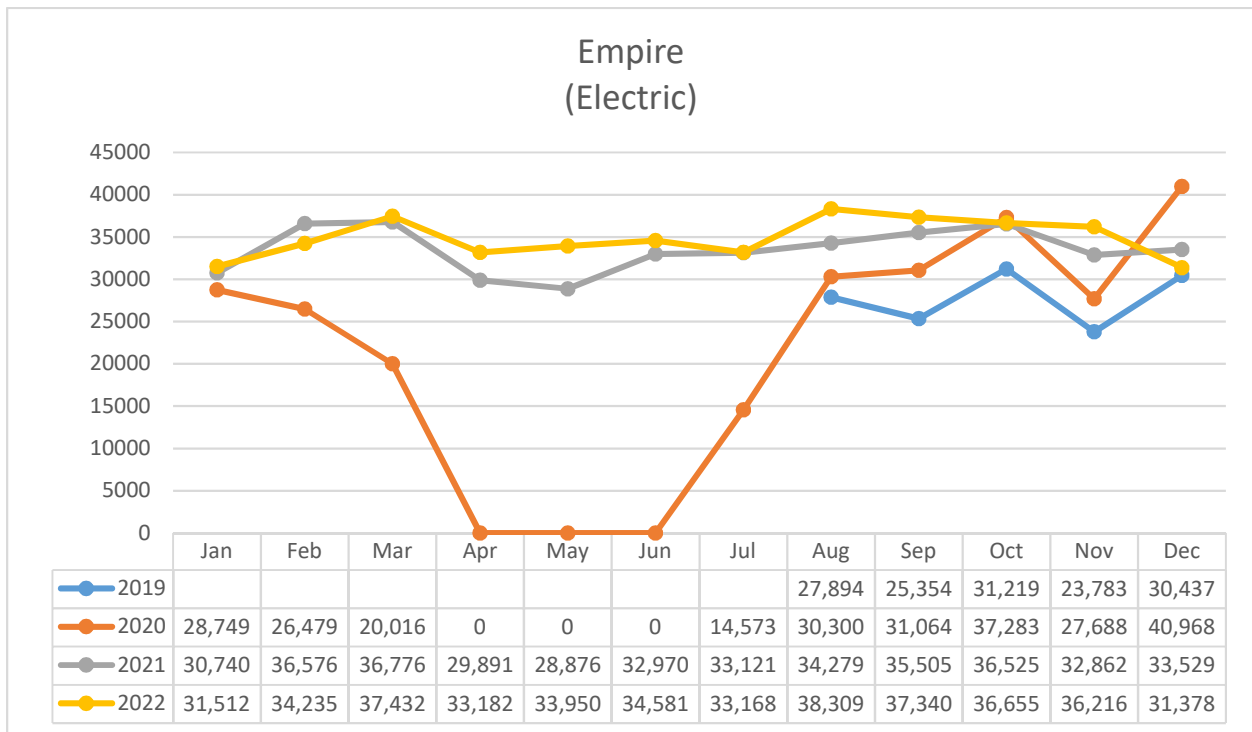
**b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”**



The previous data indicates that there was 2% more Empire customers with past-due accounts in October 2022 versus October 2021, 10% more in November 2022 versus November 2021, and 7% fewer in December 2022 versus December 2021. There were 1% fewer customers with past-due accounts in October 2022 compared to September 2022, 3% fewer in November 2022 compared to October 2022, and 13% fewer in December 2022 compared to November 2022. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement due date.

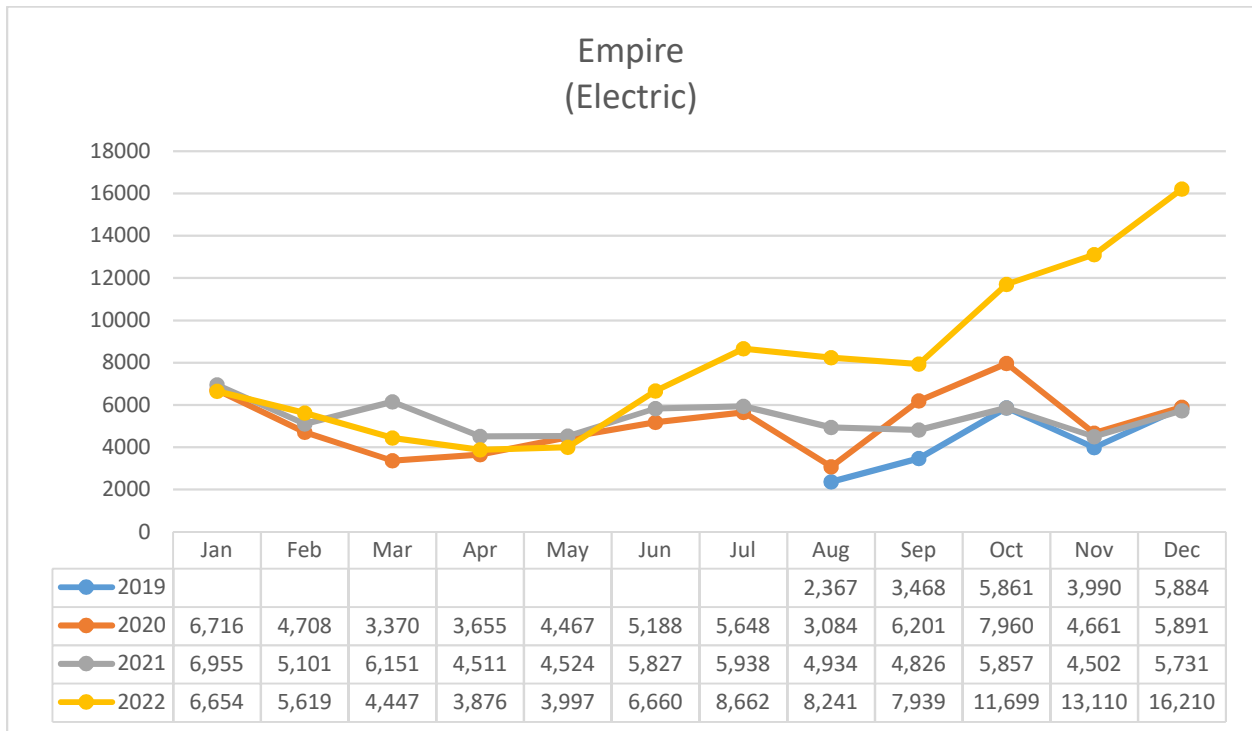


**c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end**



As shown by Empire’s data, for those customers who received a final disconnection notice there was less than 1% more customers who were not disconnected in October 2022 versus October 2021, 10% more in November 2022 versus November 2021, and 6% fewer in December 2022 versus December 2021. There were approximately 2% fewer customers who received a final disconnection notice in October 2022 compared to September 2022, 1% fewer in November 2022 compared to October 2022, and 13% fewer in December 2022 compared to November 2022.

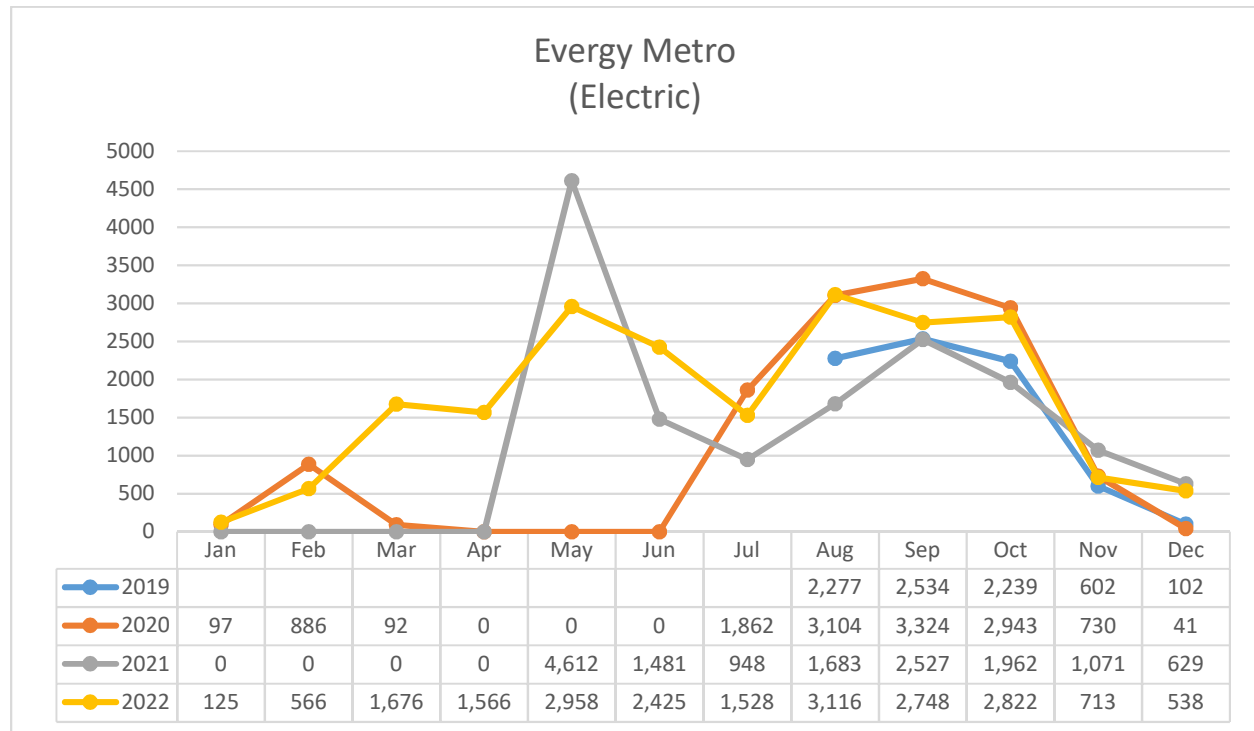
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 100% more Empire customers who participated in payment plans in October 2022 versus October 2021, 191% more in November 2022 versus November 2021, and 183% more in December 2022 versus December 2021. There were 47% more customers who participated in payment plans in October 2022 compared to September 2022, 12% more in November 2022 compared to October 2022, and 24% more in December 2022 compared to November 2022.

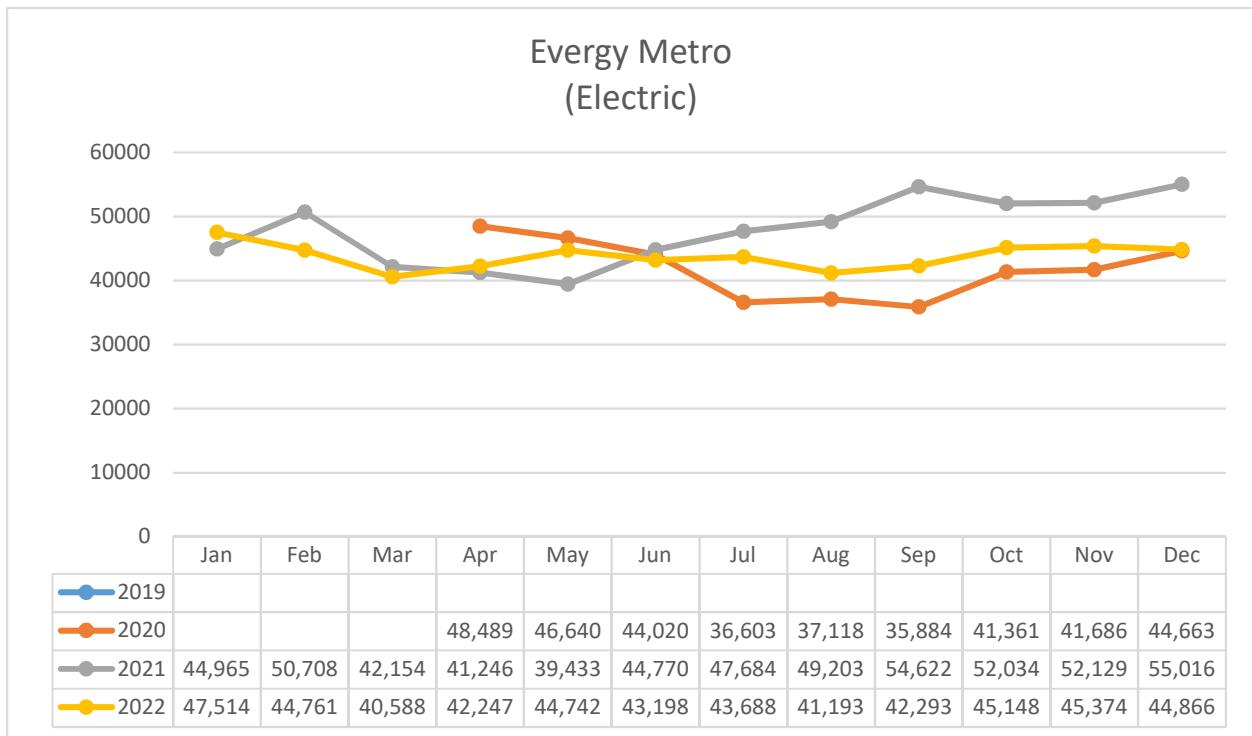
**Question 1 (Everggy Metro – Electric)**

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



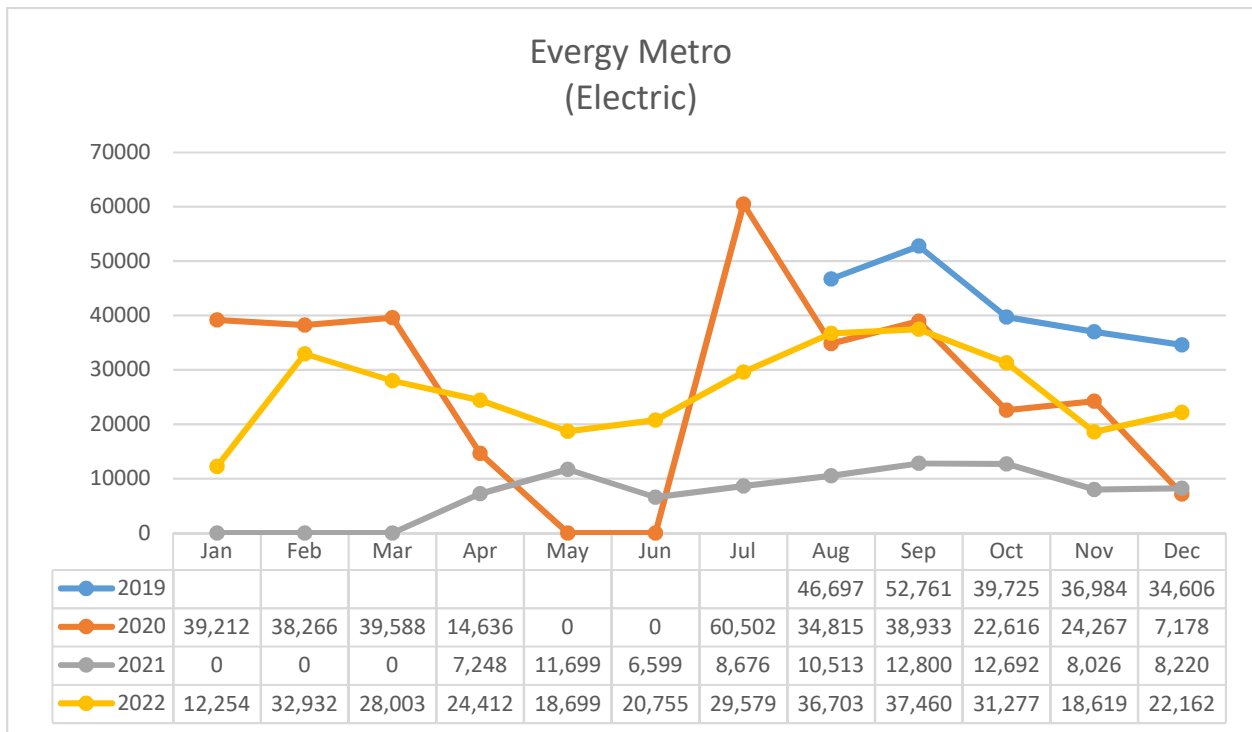
As shown in the previous graph, Evergy Metro performed approximately 44% more disconnections for non-payment in October 2022 versus October 2021, 33% fewer in November 2022 versus November 2021, and 14% fewer in December 2022 versus December 2021. There were 3% more disconnections for non-payment in October 2022 compared to September 2022, 75% fewer in November 2022 compared to October 2022, and 25% fewer in December 2022 compared to November 2022. The number of actual disconnections by Evergy Metro in October 2022 was about 6% below the amount projected by Evergy Metro for the same month, 43% above in November 2022, and 330% above in December 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”**



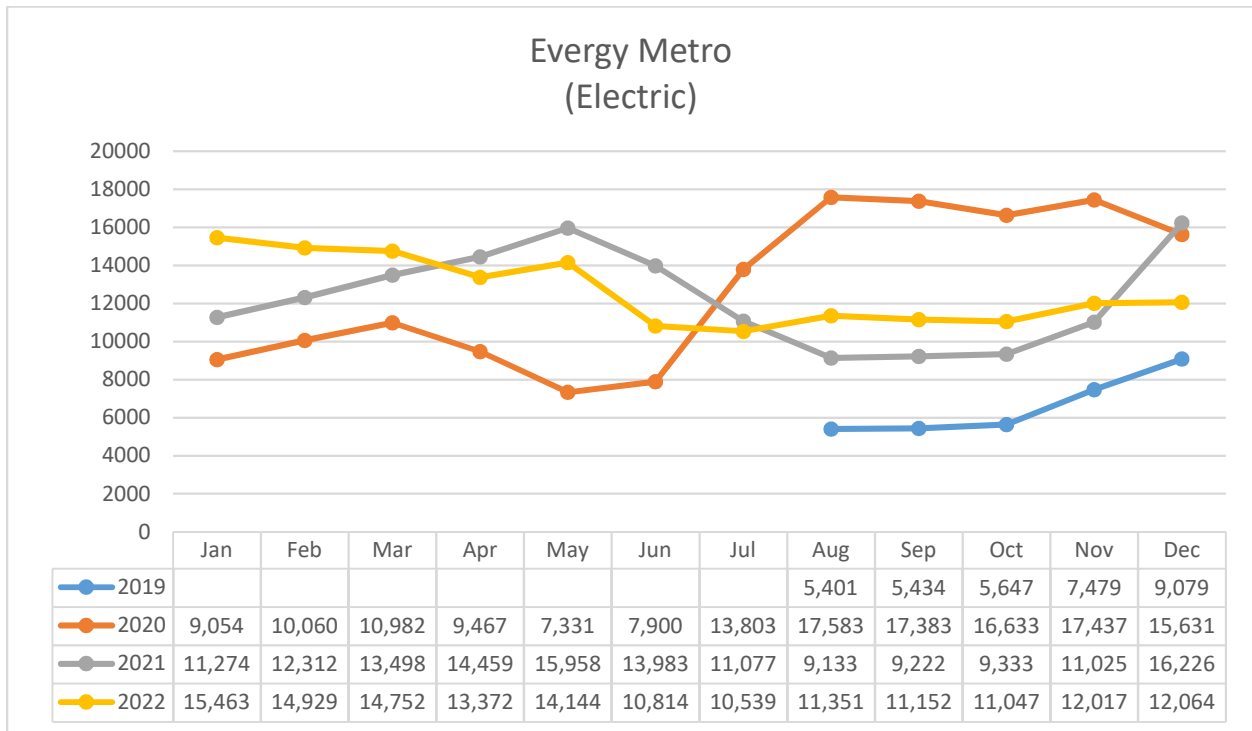
The previous data indicates that there were 13% fewer Evergy Metro customers with past-due accounts in October 2022 versus October 2021, 13% fewer in November 2022 versus November 2021, and 18% fewer in December 2022 versus December 2021. There were 7% more customers with past-due accounts in October 2022 compared to September 2022, 1% more in November 2022 compared to October 2022, and 1% fewer in December 2022 compared to November 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 146% more customers who were not disconnected in October 2022 versus October 2021, 132% more in November 2022 versus November 2021, and 170% more in December 2022 versus December 2021. There were approximately 17% fewer customers who received a final disconnection notice in October 2022 compared to September 2022, 40% fewer in November 2022 compared to October 2022, and 19% more in December 2022 compared to November 2022.

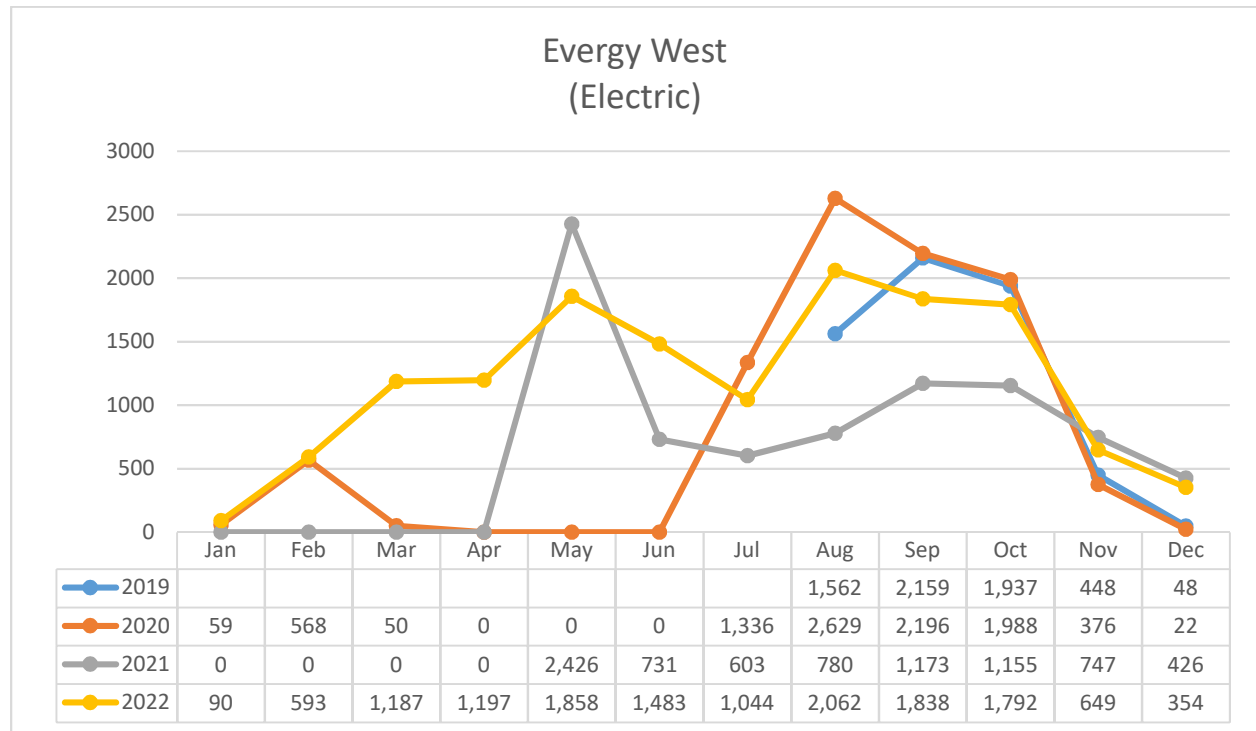
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 18% more Evergy Metro customers who participated in payment plans in October 2022 versus October 2021, 9% more in November 2022 versus November 2021, and 26% fewer in December 2022 versus December 2021. There were approximately 1% fewer customers who participated in payment plans in October 2022 compared to September 2022, 9% more in November 2022 compared to October 2022, and less than 1% more in December 2022 compared to November 2022.

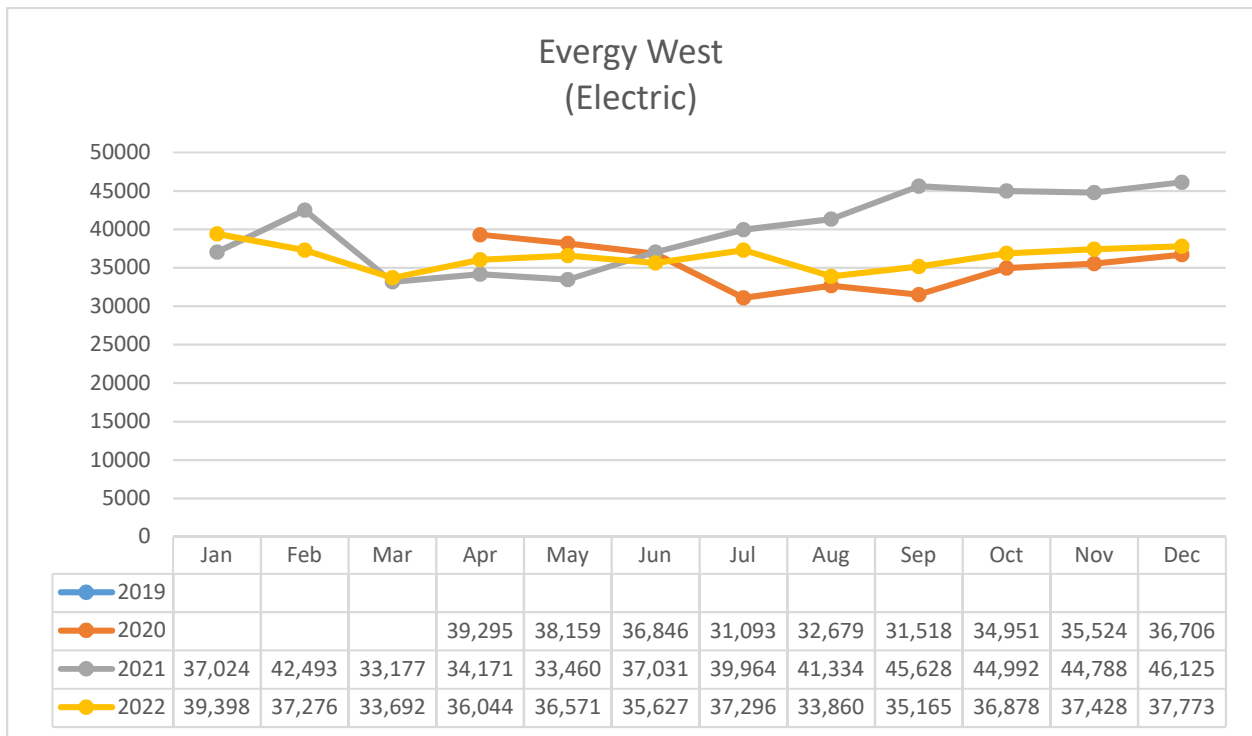
**Question 1 (Evergny West – Electric)**

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



As shown in the previous graph, Evergny West performed 55% more disconnections for non-payment in October 2022 versus October 2021, 13% fewer in November 2022 versus November 2021, and 17% fewer in December 2022 versus December 2021. There were approximately 3% fewer disconnection for non-payment in October 2022 compared to September 2022, 64% fewer in November 2022 compared to October 2022, and 45% fewer in December 2022 compared to November 2022. The number of actual disconnections by Evergny West in October 2022 was 10% below the amount projected by Evergny West for the same month, 19% below in November 2022, and 254% above in December 2022.

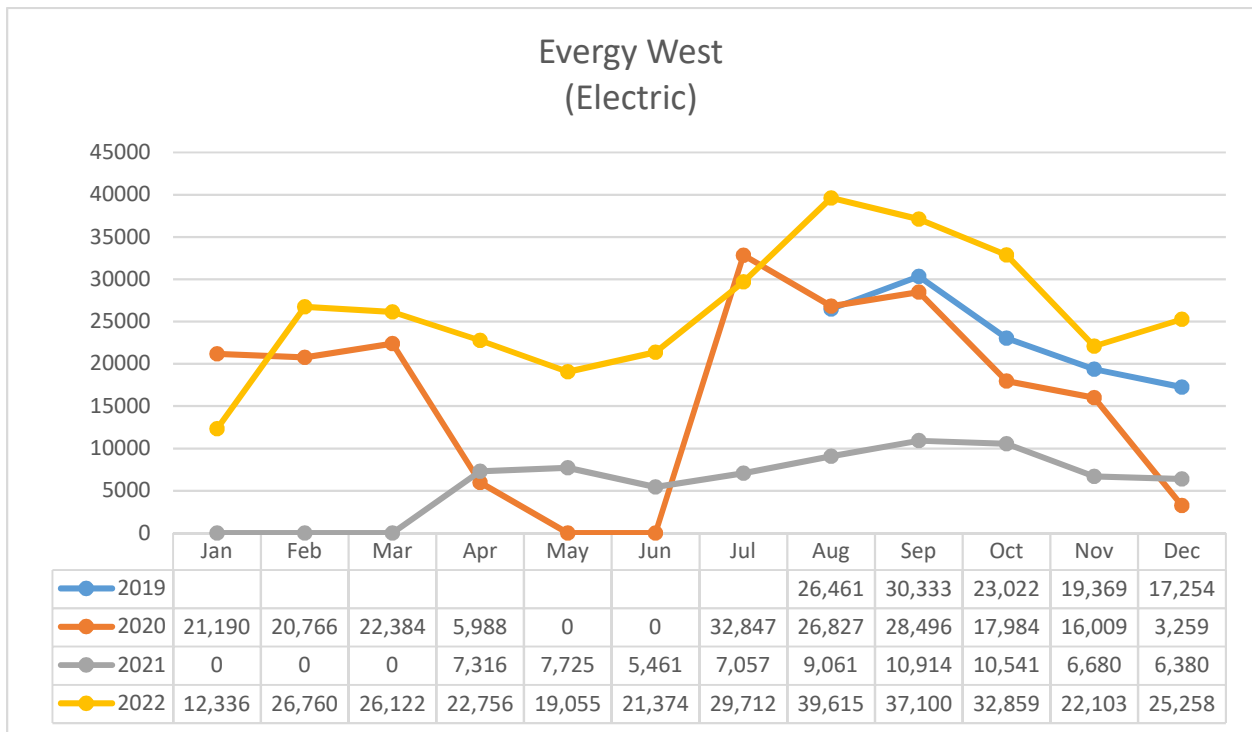
**b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”**



The previous data indicates that there were 18% fewer Evergy West customers with past-due accounts in October 2022 versus October 2021, 16% fewer in November 2022 versus November 2021, and 18% fewer in December 2022 versus December 2021. There were approximately 5% more customers with past-due accounts in October 2022 compared to September 2022, 1% more in November 2022 compared to October 2022, and 1% more in December 2022 compared to November 2022. Evergy West defines past-due accounts as accounts that are more than 30 days in arrears.

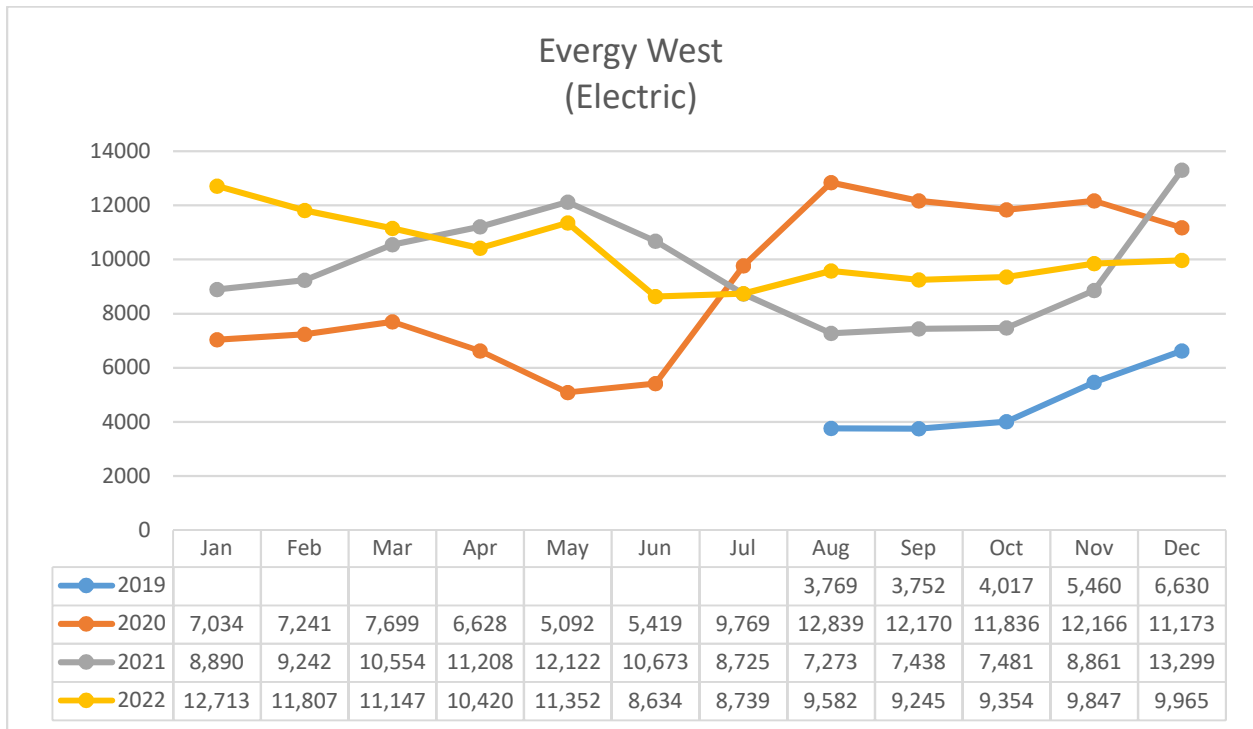


**c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end**



As shown by Evergy West’s data, for those customers who received a final disconnection notice, there were approximately 212% more customers who were not disconnected in October 2022 versus October 2021, 231% more in November 2022 versus November 2021, and 296% more in December 2022 versus December 2021. There were 11% fewer customers who received a final disconnection notice in October 2022 compared to September 2022, 33% fewer in November 2022 compared to October 2022, and 14% more in December 2022 compared to November 2022.

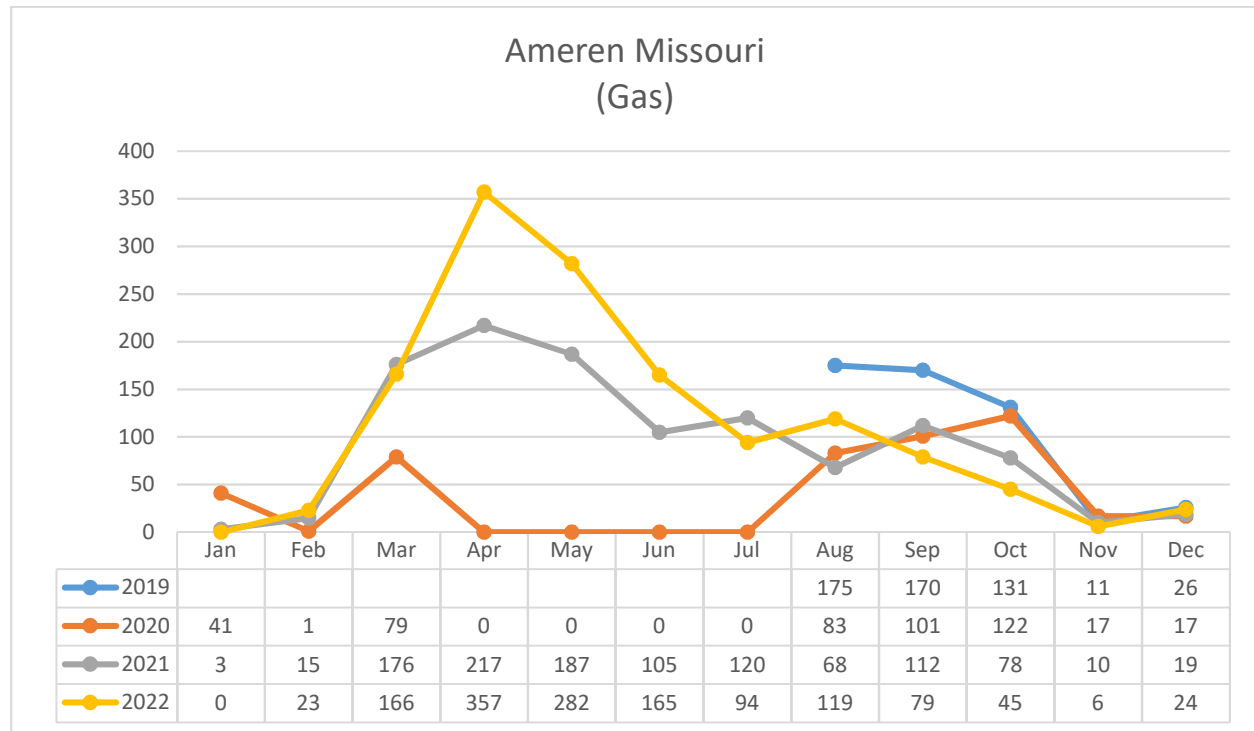
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 25% more Evergy West customers who participated in payment plans in October 2022 versus October 2021, 11% more in November 2022 versus November 2021, and 25% fewer in December 2022 versus December 2021. There were approximately 1% more customers who participated in payment plans in October 2022 compared to September 2022, 5% more in November 2022 compared to October 2022, and 1% more in December 2022 compared to November 2022.

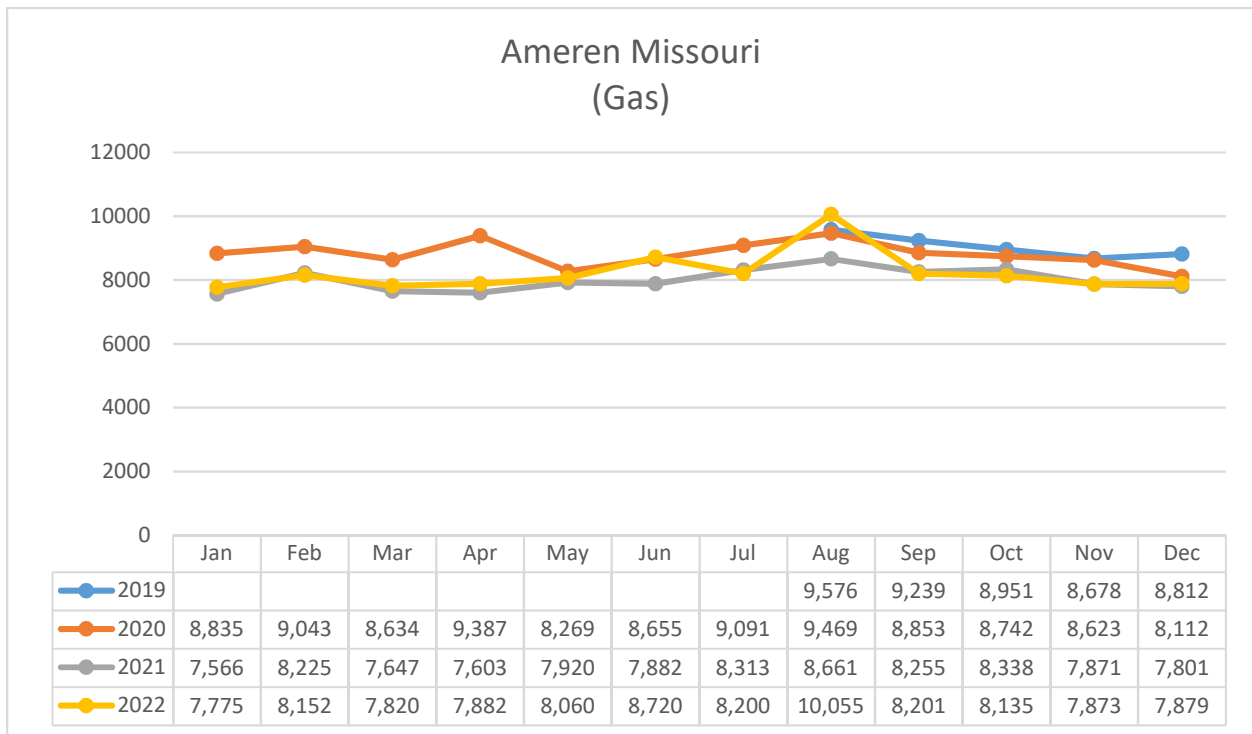
**Question 1 (Ameren Missouri – Gas)**

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



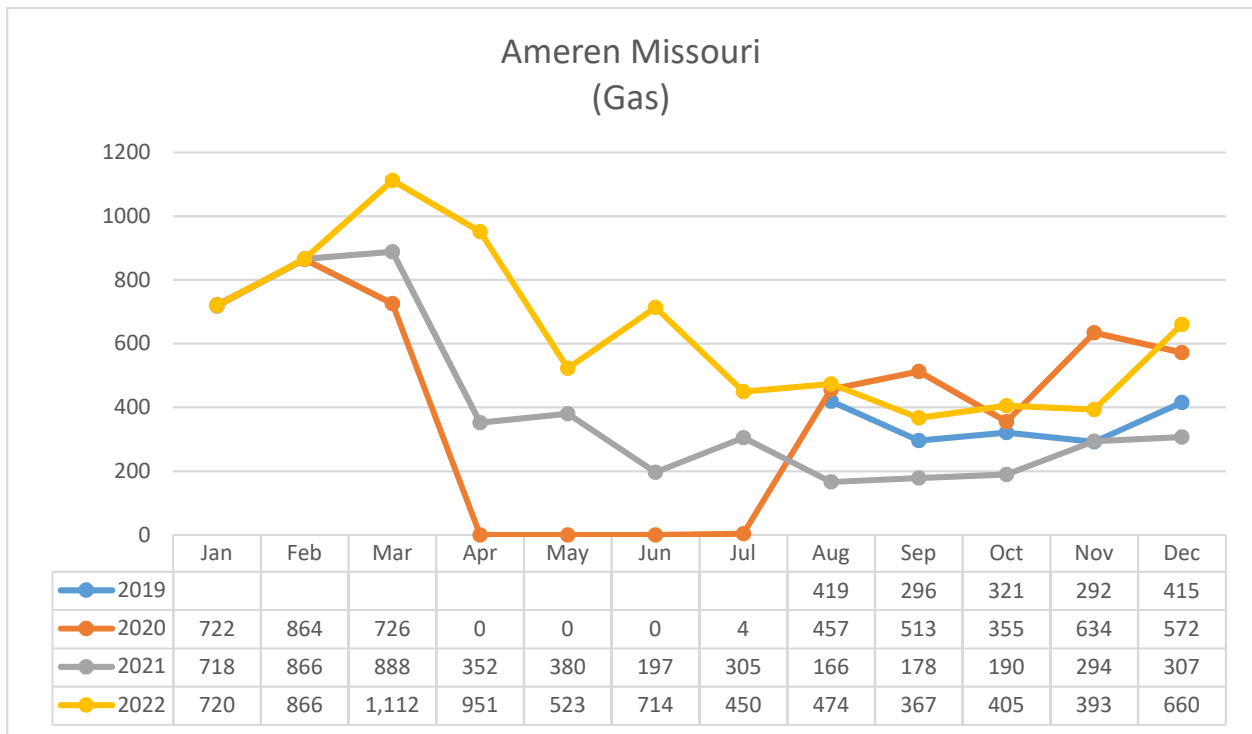
As shown in the previous graph, Ameren Missouri performed 42% fewer disconnections for non-payment in October 2022 versus October 2021, 40% fewer in November 2022 versus November 2021, and 26% more in December 2022 versus December 2021. There were 43% fewer disconnections for non-payment in October 2022 compared to September 2022, 87% fewer in November 2022 compared to October 2022, and 300% more in December 2022 compared to November 2022. The number of actual disconnections by Ameren Missouri in October 2022 was 57% below the projected number for the same month, 63% below in November 2022, and 9% above in December 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”**



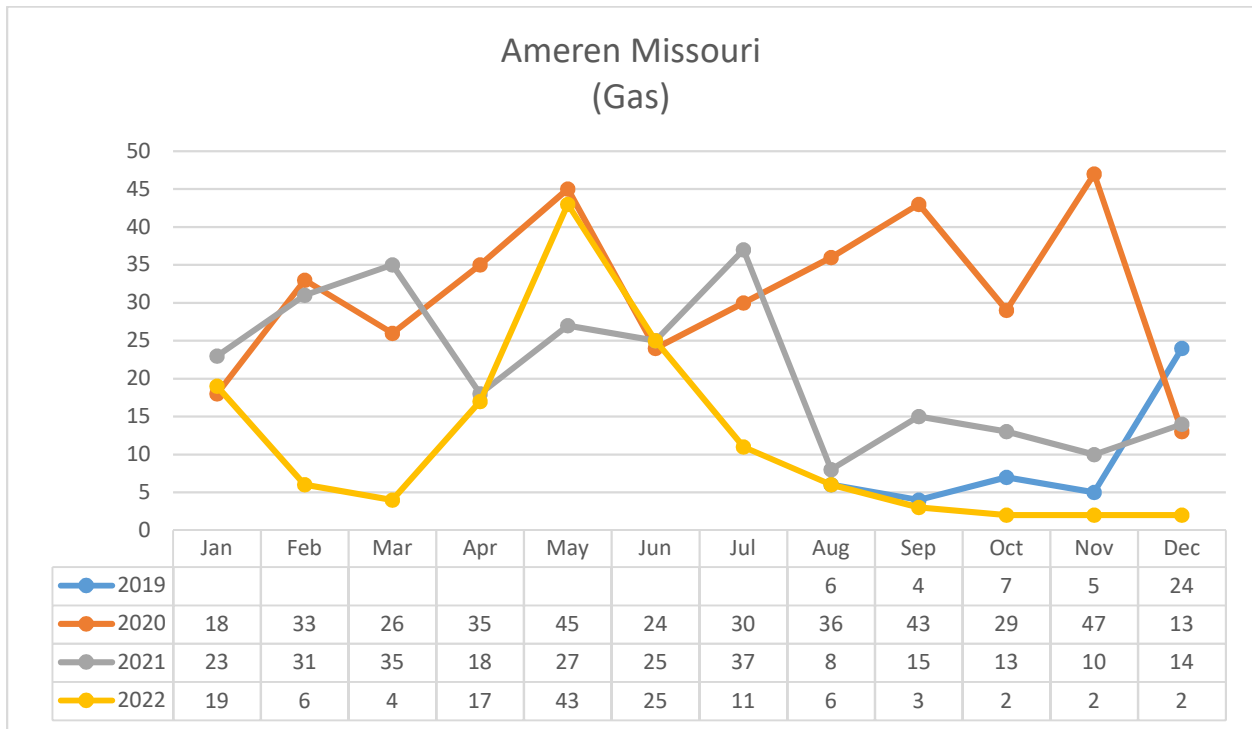
The previous data indicates that there were approximately 2% fewer Ameren Missouri customers with past-due accounts in October 2022 versus October 2021, less than 1% more in November 2022 versus November 2021, and 1% more in December 2022 versus December 2021. There were approximately 1% fewer customers with past-due accounts in October 2022 compared to September 2022, 3% fewer in November 2022 compared to October 2022, and less than 1% more in December 2022 compared to November 2022. 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 approximately 113% more customers who were not disconnected in October 2022 versus October 2021, 34% more customers who were not disconnected in November 2022 versus November 2021, and 115% more in December 2022 versus December 2021. There were approximately 10% more in October 2022 compared to September 2022, 3% fewer customers who received a final disconnection notice in November 2022 compared to October 2022, and 68% more in December 2022 compared to November 2022.

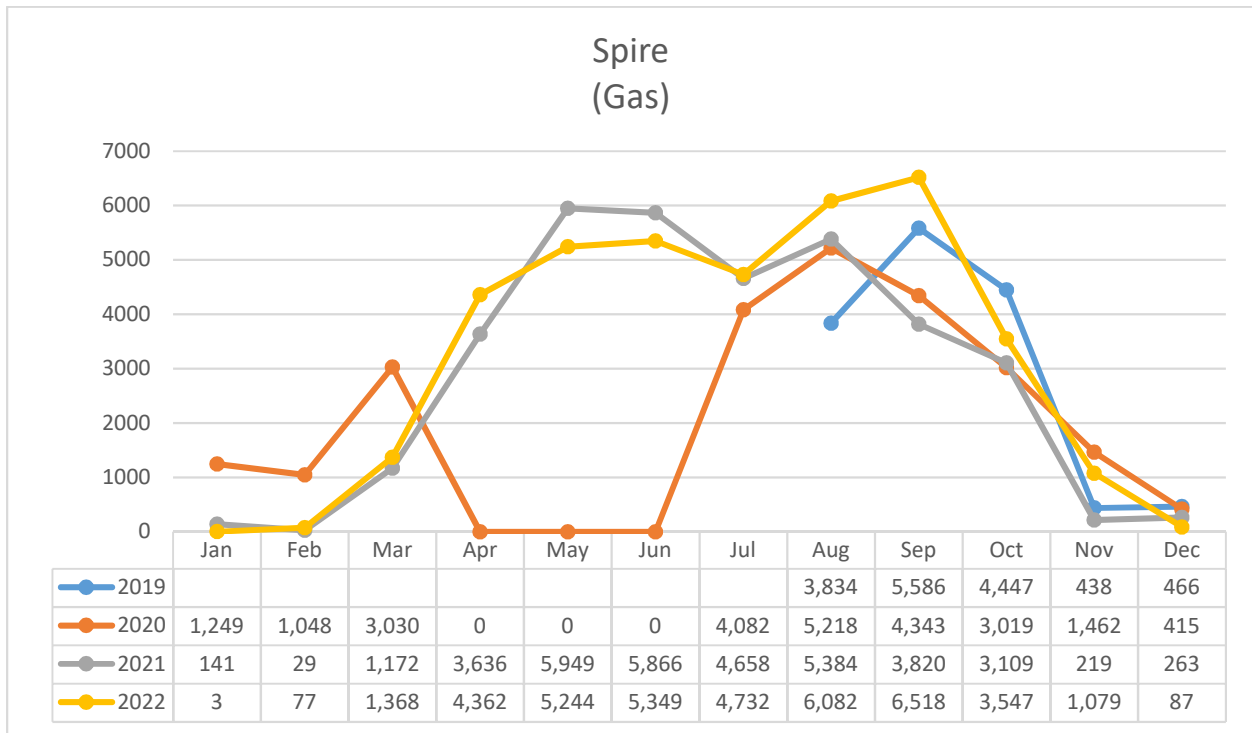
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there was 85% fewer Ameren Missouri customers who participated in payment plans in October 2022 versus October 2021, 80% fewer in November 2022 versus November 2021, and 86% fewer in December 2022 versus December 2021. There was 1 fewer customers participating in October 2022 compared to September 2022, the same number in November 2022 compared to October 2022, and the same number in December 2022 compared to November 2022.

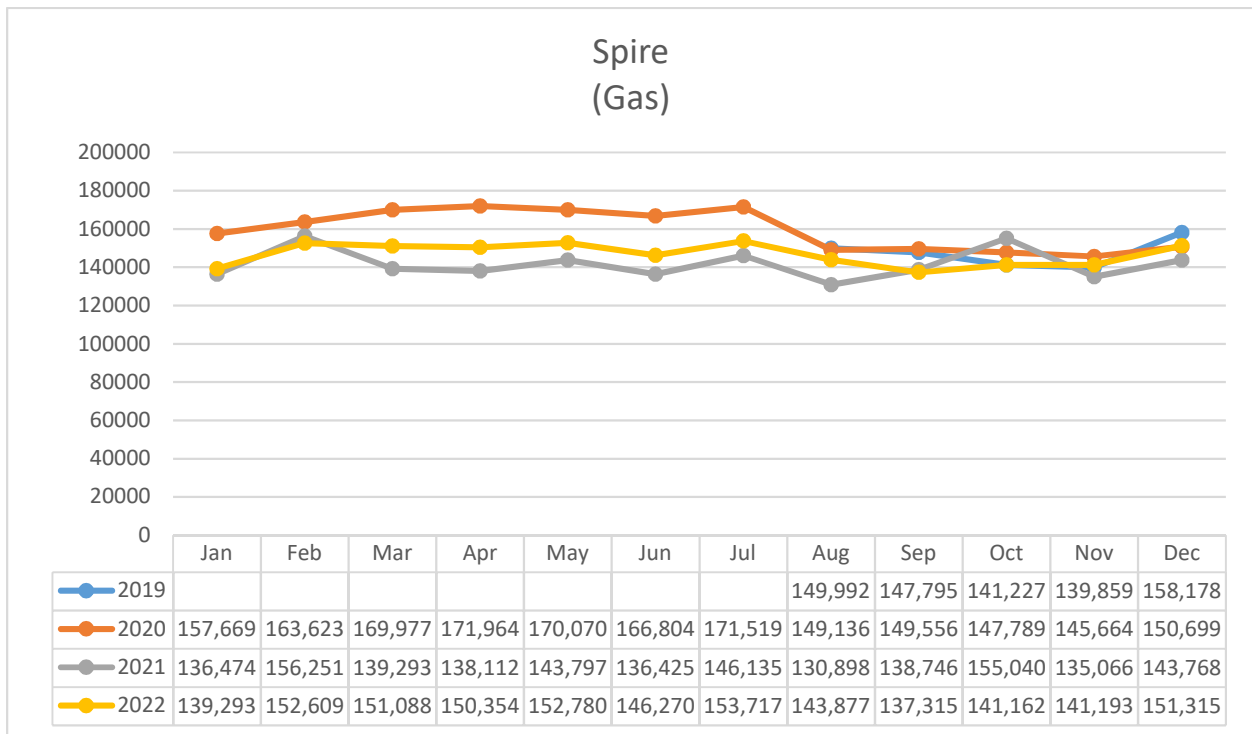
**Question 1 (Spire - Gas)**

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



As shown in the previous graph, Spire performed approximately 14% more disconnections for non-payment in October 2022 versus October 2021, 393% more in November 2022 versus November 2021, and 67% fewer in December 2022 versus December 2021. There were 46% fewer disconnections for non-payment in October 2022 compared to September 2022, 70% fewer in November 2022 compared to October 2022, and 92% fewer in December 2022 compared to November 2022. The actual number of disconnections for October 2022 was 24% below the projected number of disconnections for the same month, 11% below for November 2022 and 92% below for December 2022.

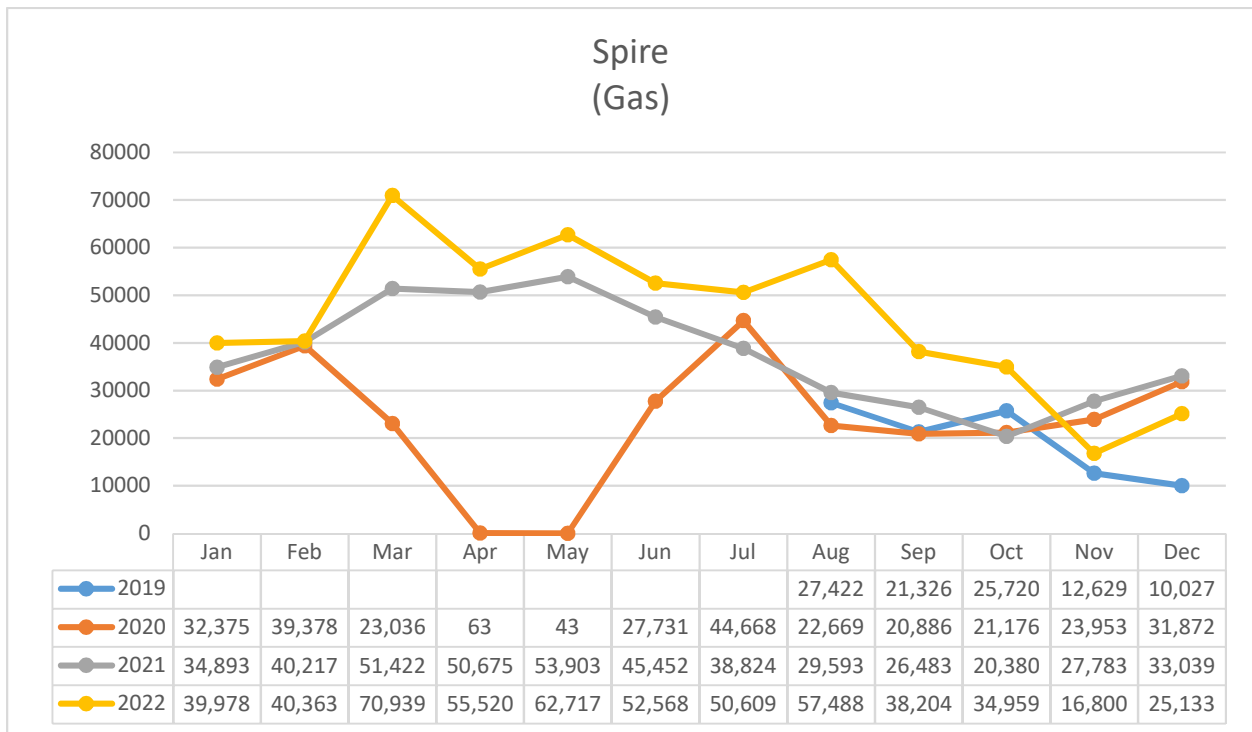
**b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”**



The previous data indicates that there were about 9% fewer Spire customers with past-due accounts in October 2022 versus October 2021, 5% more in November 2022 versus November 2021, and 5% more in December 2022 versus December 2021. There were about 3% more customers with past-due accounts in October 2022 compared to September 2022, less than 1% more in November 2022 compared to October 2022, and 7% more in December 2022 compared to November 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.

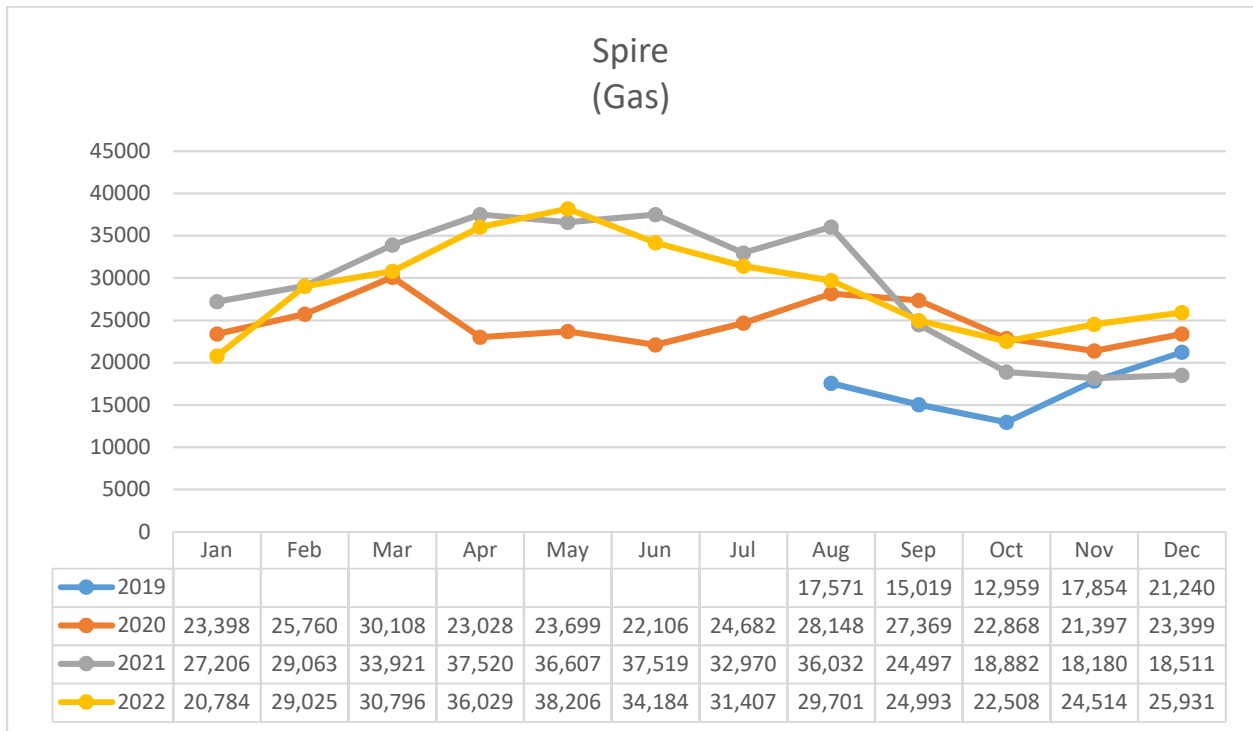


**c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end**



As shown by Spire’s data, for those customers who received a final disconnection notice there was 72% more customers who were not disconnected in October 2022 versus October 2021, 40% fewer in November 2022 versus November 2021, and 24% fewer in December 2022 versus December 2021. There were 8% fewer customers who received a final disconnection notice in October 2022 compared to September 2022, 52% fewer in November 2022 compared to October 2022, and 50% more in December 2022 compared to November 2022.

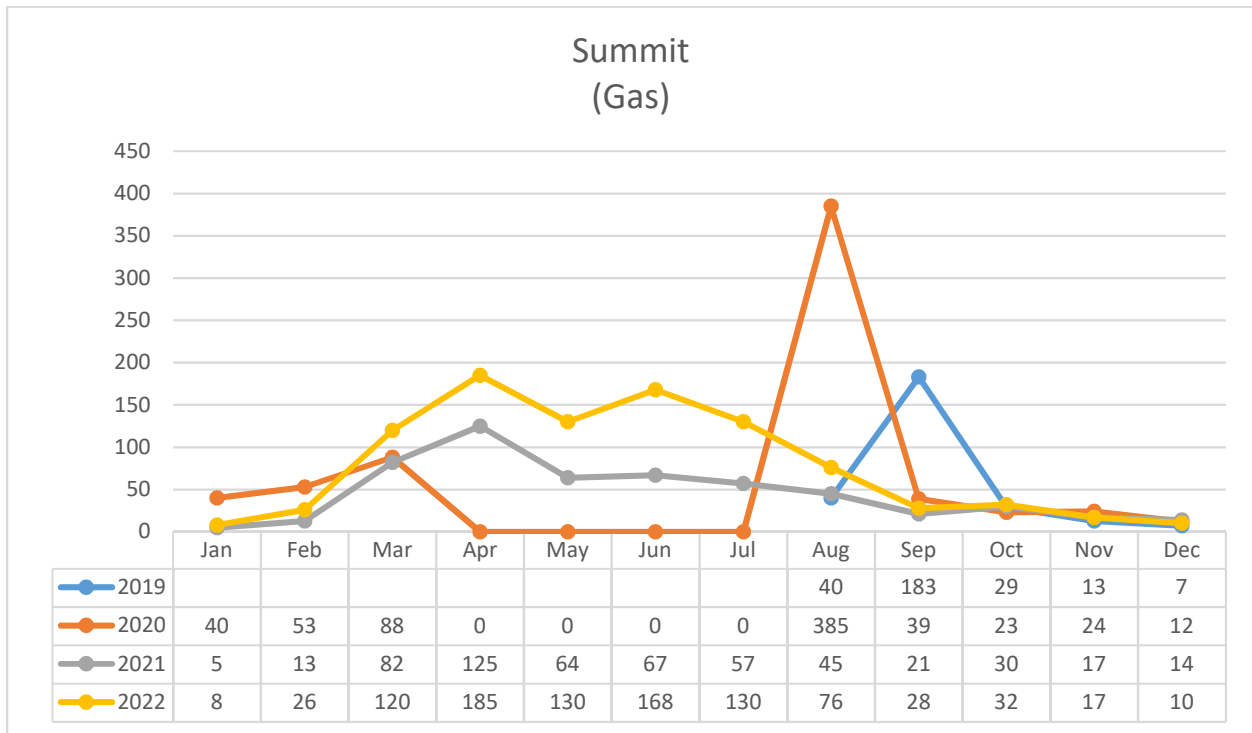
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were 19% more Spire customers who participated in payment plans in October 2022 versus October 2021, 35% more in November 2022 versus November 2021, and 40% more in December 2022 versus December 2021. There were approximately 10% fewer customers who participated in payment plans in October 2022 compared to September 2022, 9% more in November 2022 compared to October 2022, and 6% more in December 2022 compared to November 2022.

**Question 1 (Summit - Gas)<sup>5</sup>**

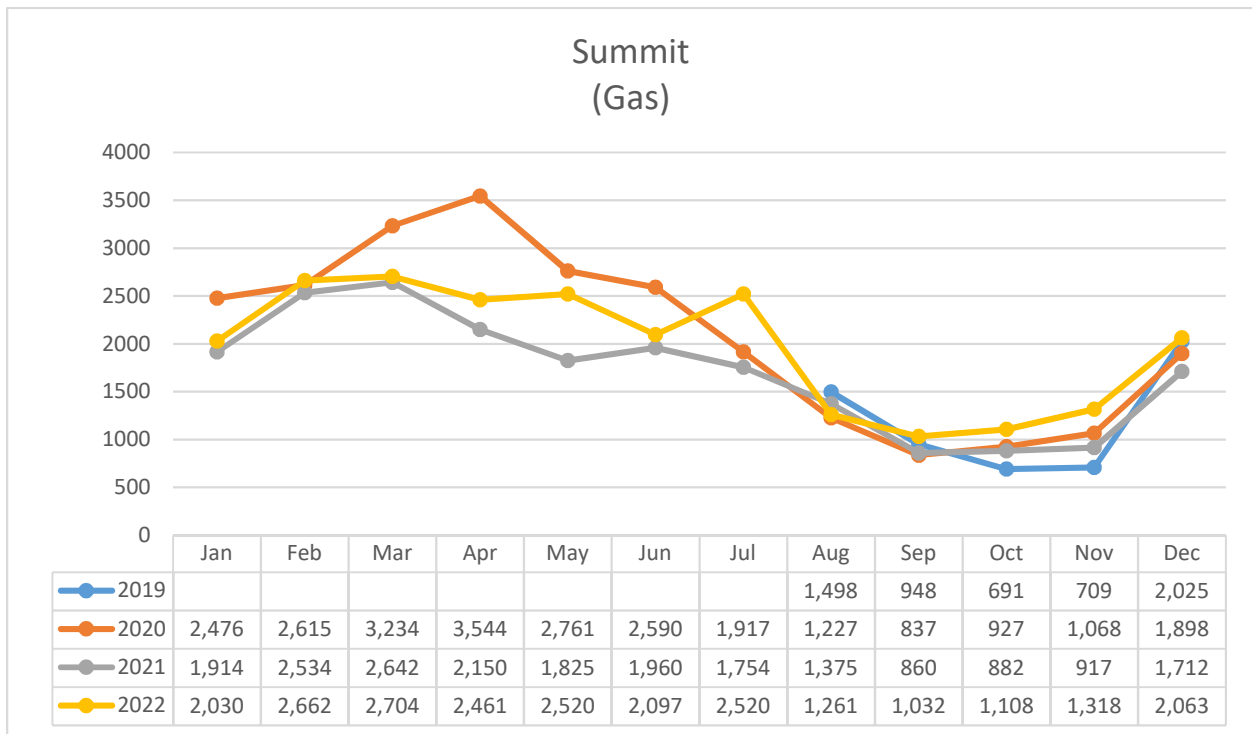
**a) The number of disconnections for non-payment of services as of each month-end**



As shown in the previous graph, Summit performed 7% more disconnections for non-payment in October 2022 versus October 2021, the same number in November 2022 versus November 2021, and 29% fewer in December 2022 versus December 2021. There were 14% more disconnections in October 2022 compared to September 2022, 47% fewer in November 2022 compared to October 2022, and 41% fewer in December 2022 compared to November 2022. The number of actual disconnections by Summit in October 2022 was 14% above the amount projected by Summit for the same month, the same number in November 2022, and 29% below in December 2022.

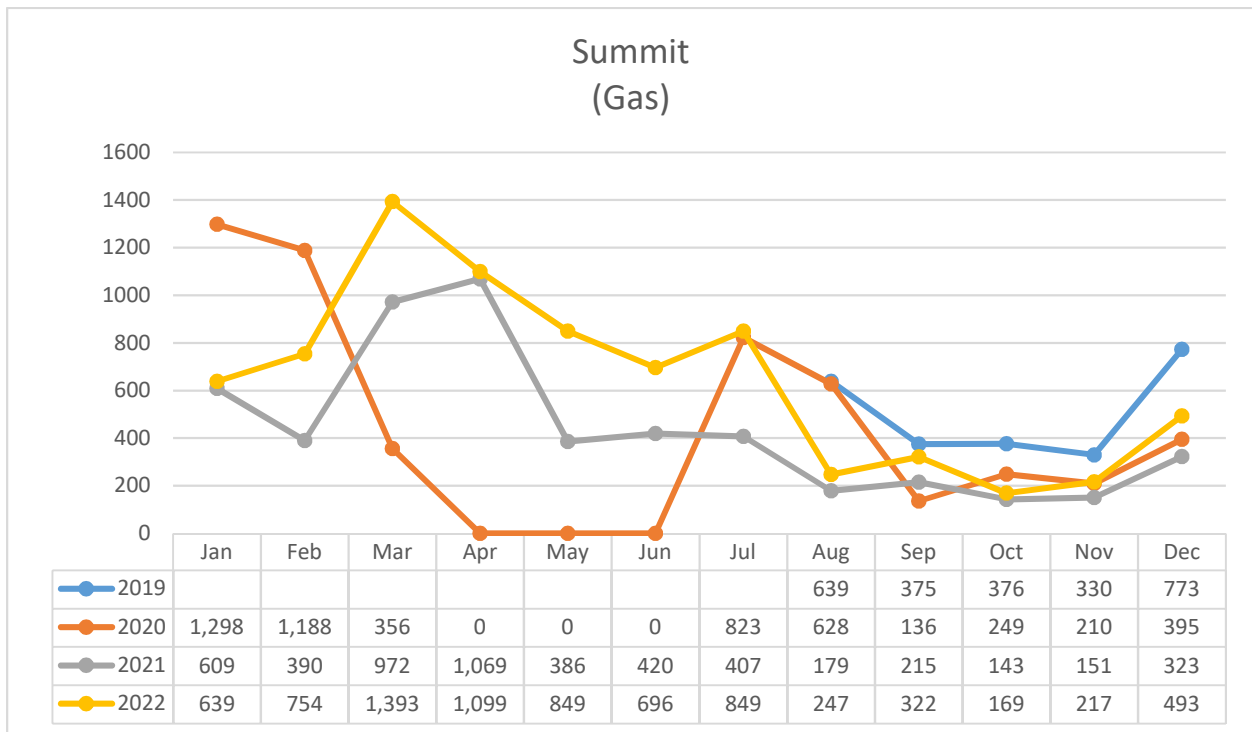
<sup>5</sup> Revised Data Request Response No. 0007.1 stated a discrepancy was identified in the numbers reported for sections 1(a), 1(b), 1(c), and 1(d). Data would sometimes fluctuate from a previous response in subsequent months. Data variations include information updated to utilize dates of resolutions, 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”**



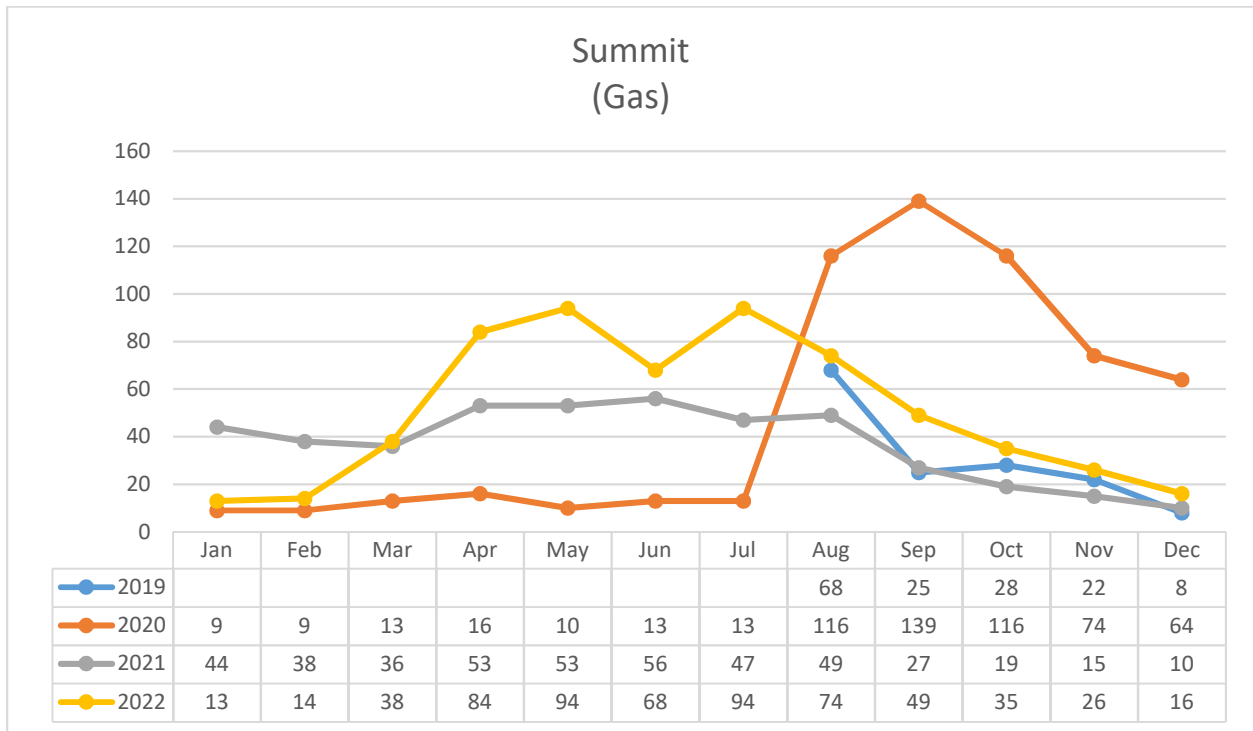
The previous data indicates that there were about 26% more Summit customers with past-due accounts in October 2022 versus October 2021, 44% more in November 2022 versus November 2021, and 21% more in December 2022 versus December 2021. There were 7% more customers with past-due accounts in October 2022 compared to September 2022, 19% more in November 2022 compared to October 2022, and 57% more in December 2022 compared to November 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 18% more customers who were not disconnected in October 2022 versus October 2021, 44% more in November 2022 versus November 2021, and 53% more in December 2022 versus December 2021. There were approximately 48% fewer customers who received a final disconnection notice in October 2022 compared to September 2022, 28% more in November 2022 compared to October 2022, and 127% more in December 2022 compared to November 2022.

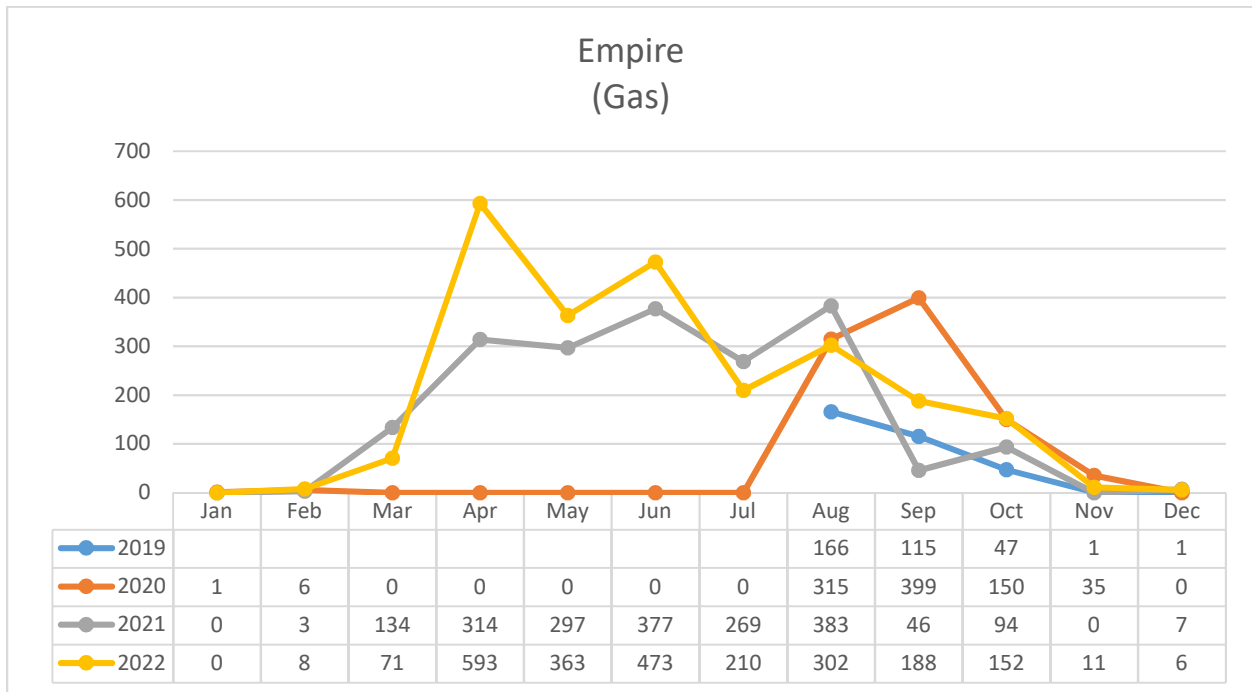
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 84% more Summit customers who participated in payment plans in October 2022 versus October 2021, 73% more in November 2022 versus November 2021, and 60% more in December 2022 versus December 2021. There were 29% fewer customers who participated in payment plans in October 2022 compared to September 2022, 26% fewer in November 2022 compared to October 2022, and 38% fewer in December 2022 compared to November 2022.

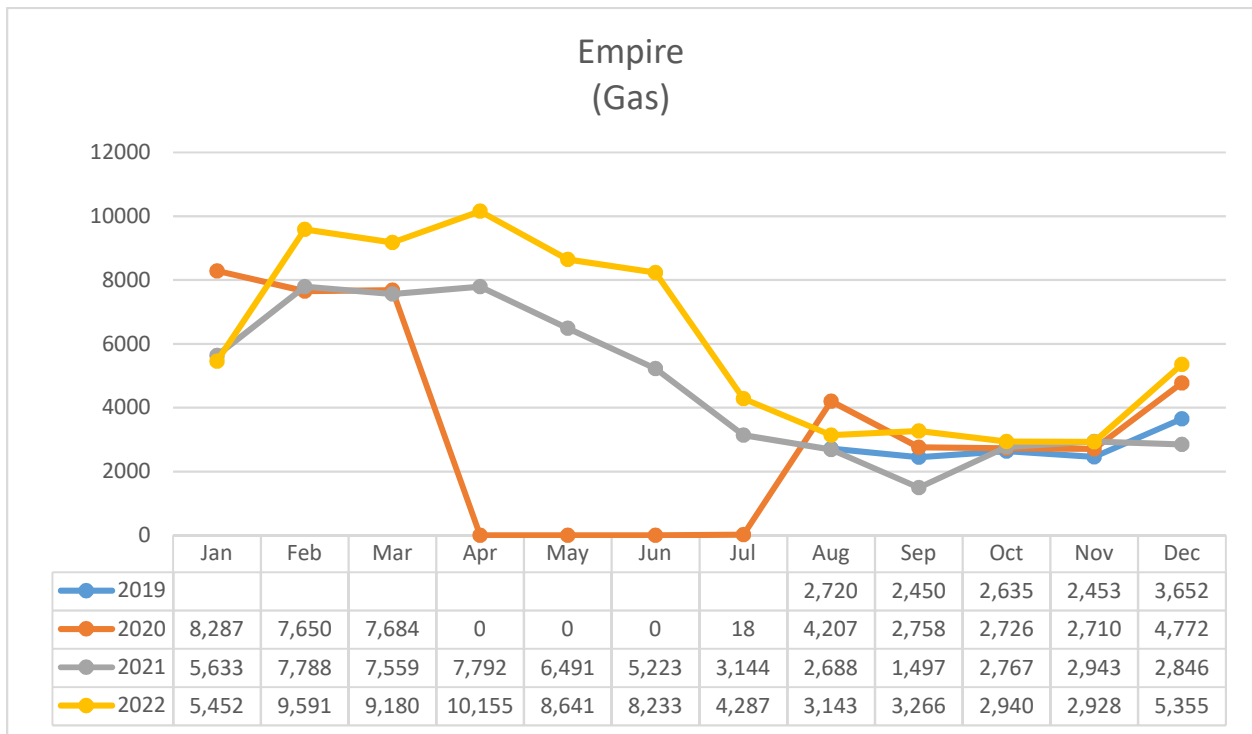
**Question 1 (Empire - Gas)**

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



As shown in the previous graph, Empire performed 62% more disconnections for non-payment in October 2022 versus October 2021, there were 11 in November 2022 versus 0 in November 2021, and 1 fewer in December 2022 versus December 2021. There were 19% fewer disconnections for non-payment in October 2022 compared to September 2022, 93% fewer in November 2022 compared to October 2022, and 45% fewer in December 2022 compared to November 2022. The projected number of disconnections by Empire for October 2022 was 114% above the projected number of disconnections for the same month, 39% below for November 2022, and 50% above for December 2022.

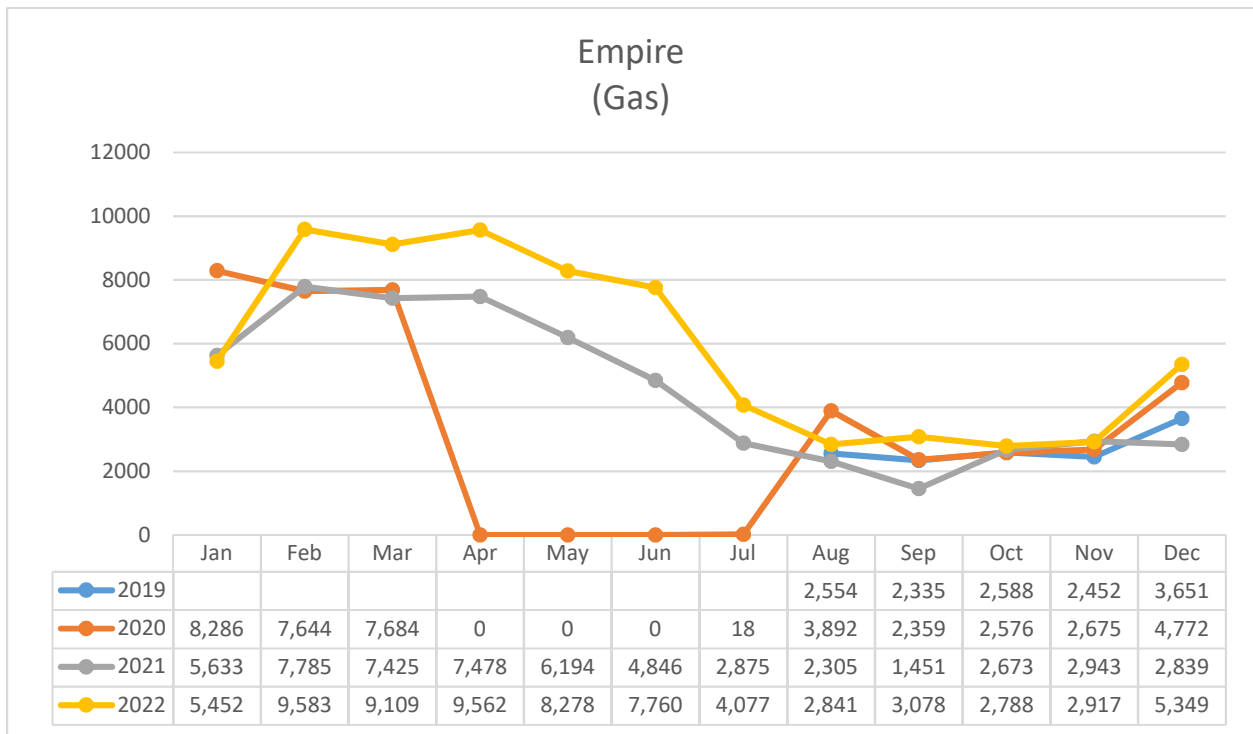
**b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”**



The previous data indicates that there were approximately 6% more Empire customers with past-due accounts in October 2022 versus October 2021, 1% fewer in November 2022 versus November 2021, and 88% more in December 2022 versus December 2021. There were 10% fewer customers with past-due accounts in October 2022 compared to September 2022, less than 1% fewer in November 2022 compared to October 2022, and 83% more in December 2022 compared to November 2022. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement due date.

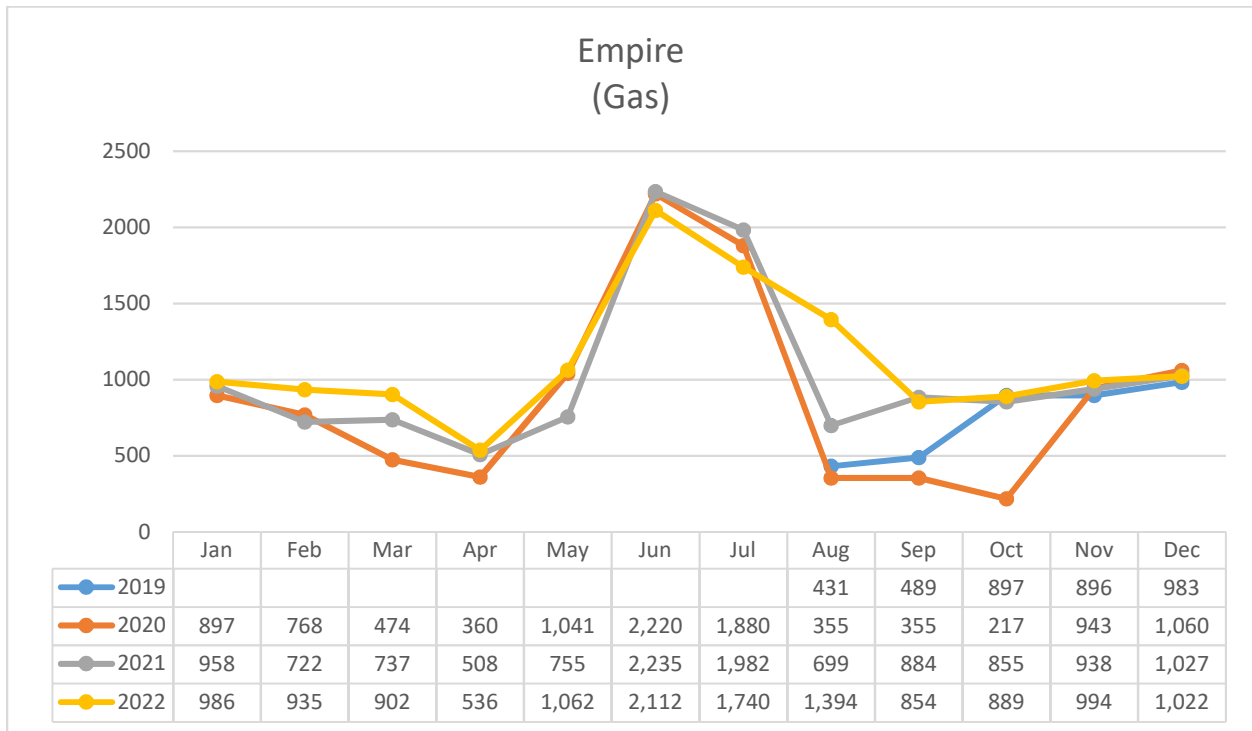


**c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end**



As shown by Empire’s data, for those customers who received a final disconnection notice there were approximately 4% more customers who were not disconnected in October 2022 versus October 2021, 1% fewer in November 2022 versus November 2021, and 88% more in December 2022 versus December 2021. There were 9% fewer customers who received a final disconnection notice in October 2022 compared to September 2022, 5% more in November 2022 compared to October 2022, and 83% more in December 2022 compared to November 2022.

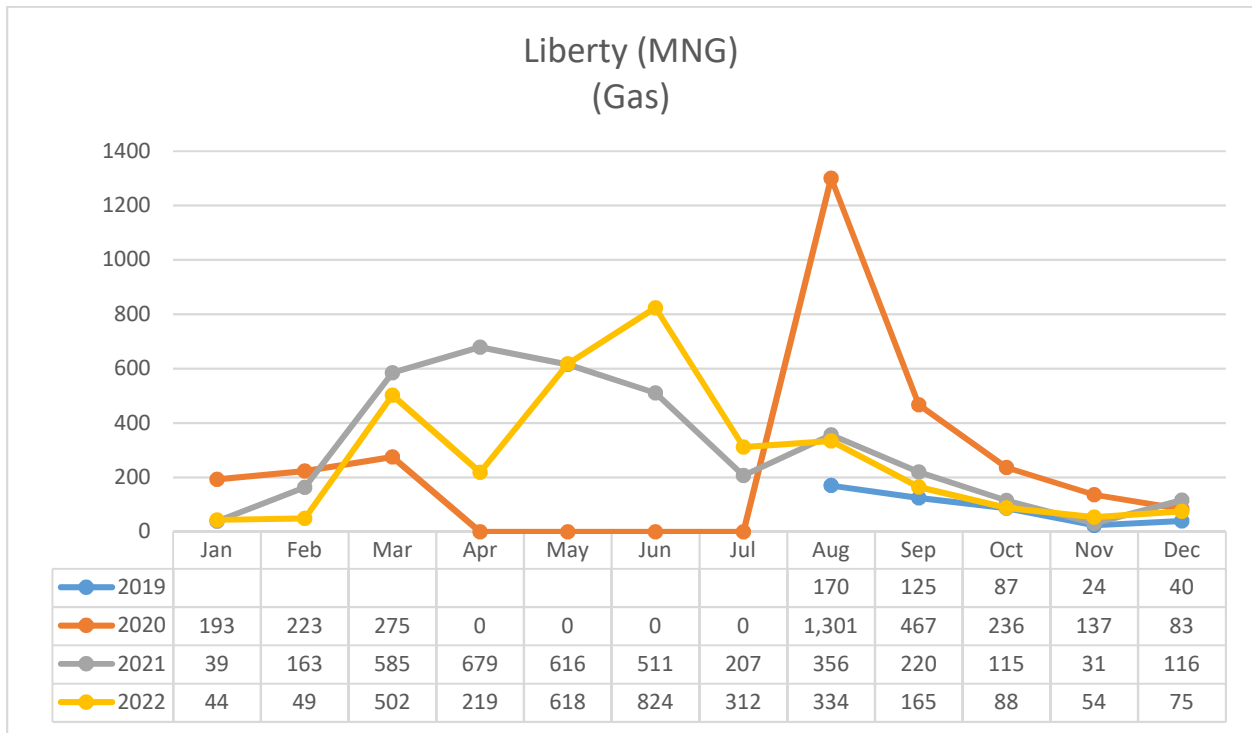
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were 4% more Empire customers who participated in payment plans in October 2022 versus October 2021, 6% more in November 2022 versus November 2021, and less than 1% fewer in December 2022 versus December 2021. There were about 4% more customers who participated in payment plans in October 2022 compared to September 2022, 12% more in November 2022 compared to October 2022, and 3% more in December 2022 compared to November 2022.

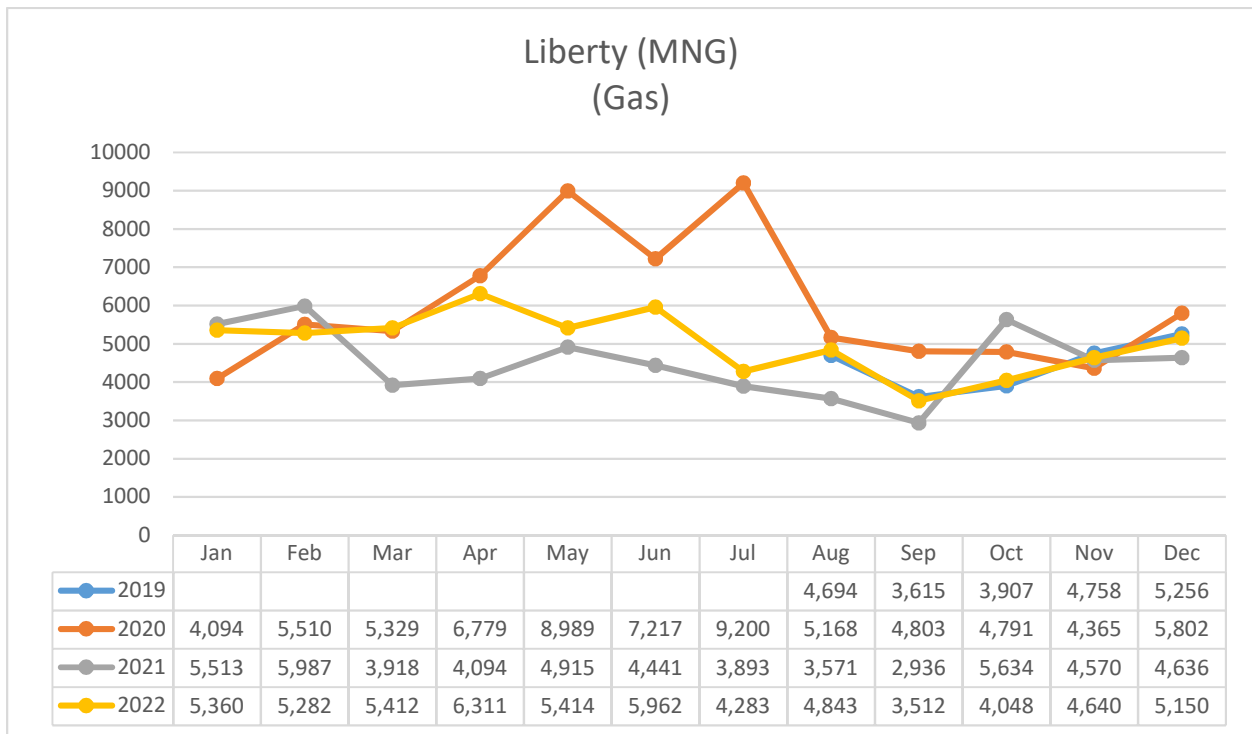
**Question 1 (Liberty (MNG) - Gas)**

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



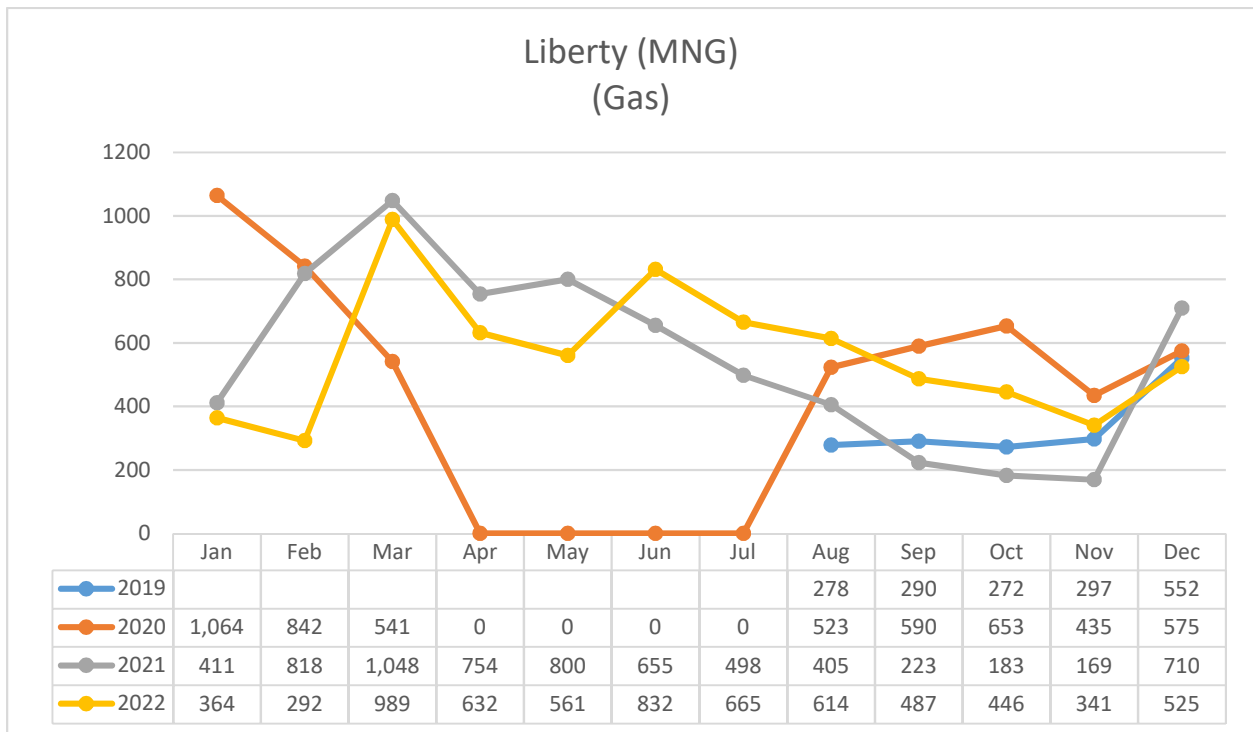
As shown in the previous graph, Liberty (MNG) performed 23% fewer disconnections for non-payment in October 2022 versus October 2021, 74% more in November 2022 versus November 2021, and 35% fewer in December 2022 versus December 2021. There were 47% fewer disconnections for non-payment in October 2022 compared to September 2022, 39% fewer in November 2022 compared to October 2022, and 39% more in December 2022 compared to November 2022. The actual number of disconnections by Liberty (MNG) for October 2022 was 78% below the amount projected by Liberty (MNG) for the same month, 82% below in November 2022, and 25% below in December 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”**



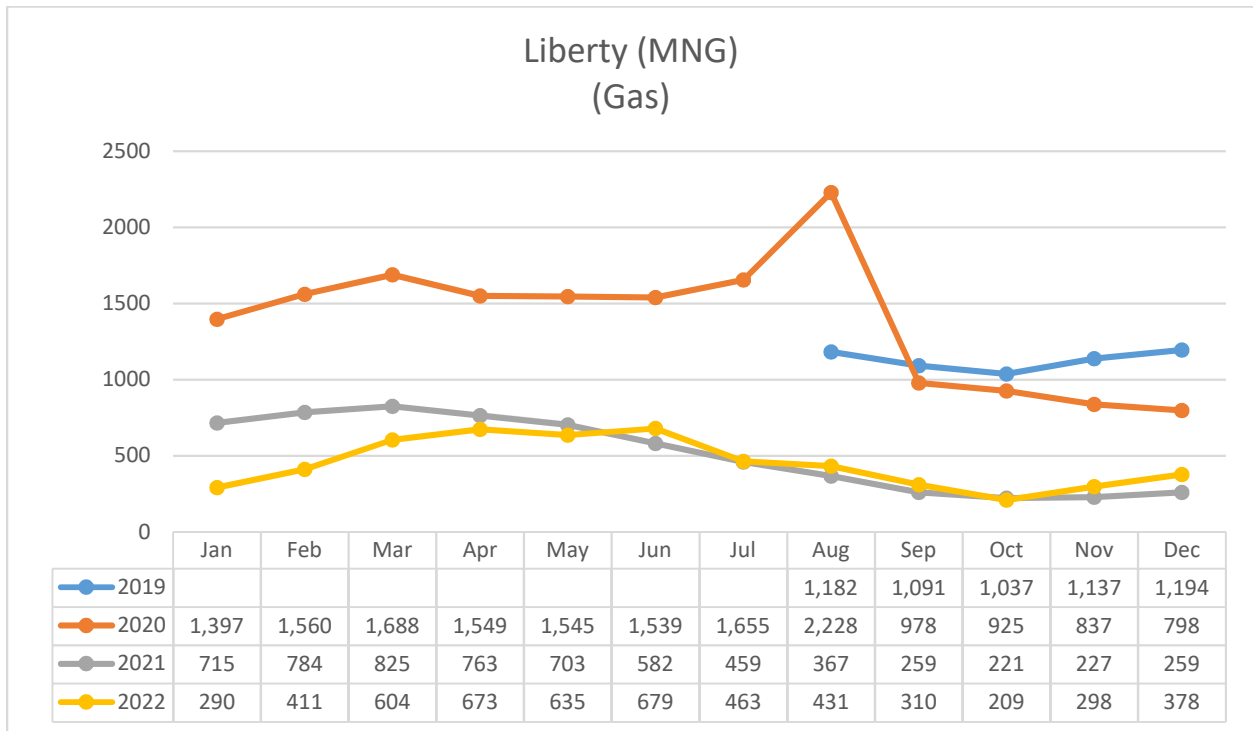
The previous data indicates that there were approximately 28% fewer Liberty (MNG) customers with past-due accounts in October 2022 versus October 2021, 2% more in November 2022 versus November 2021, and 11% more in December 2022 versus December 2021. There were approximately 15% more customers with past-due accounts in October 2022 compared to September 2022, 15% more in November 2022 compared to October 2022, and 11% more in December 2022 compared to November 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 144% more customers who were not disconnected in October 2022 versus October 2021, 102% more in November 2022 versus November 2021, and 26% fewer in December 2022 versus December 2021. There were approximately 8% fewer customers who received a final disconnection notice in October 2022 compared to September 2022, 24% fewer in November 2022 compared to October 2022, and 54% more in December 2022 compared to November 2022.

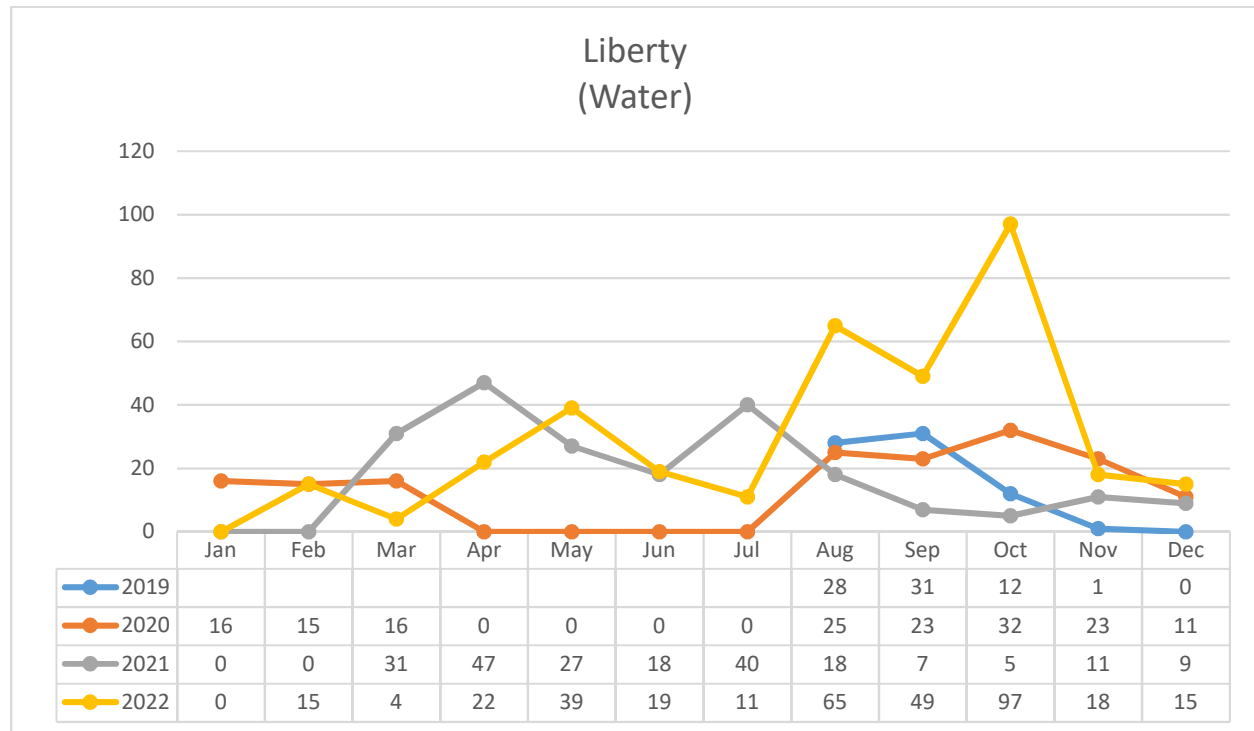
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 5% fewer Liberty (MNG) customers who participated in payment plans in October 2022 versus October 2021, 31% more in November 2022 versus November 2021, and 46% more in December 2022 versus December 2021. There were 33% fewer customers participating in payment plans in October 2022 compared to September 2022, 43% more in November 2022 compared to October 2022, and 27% more in December 2022 compared to November 2022.

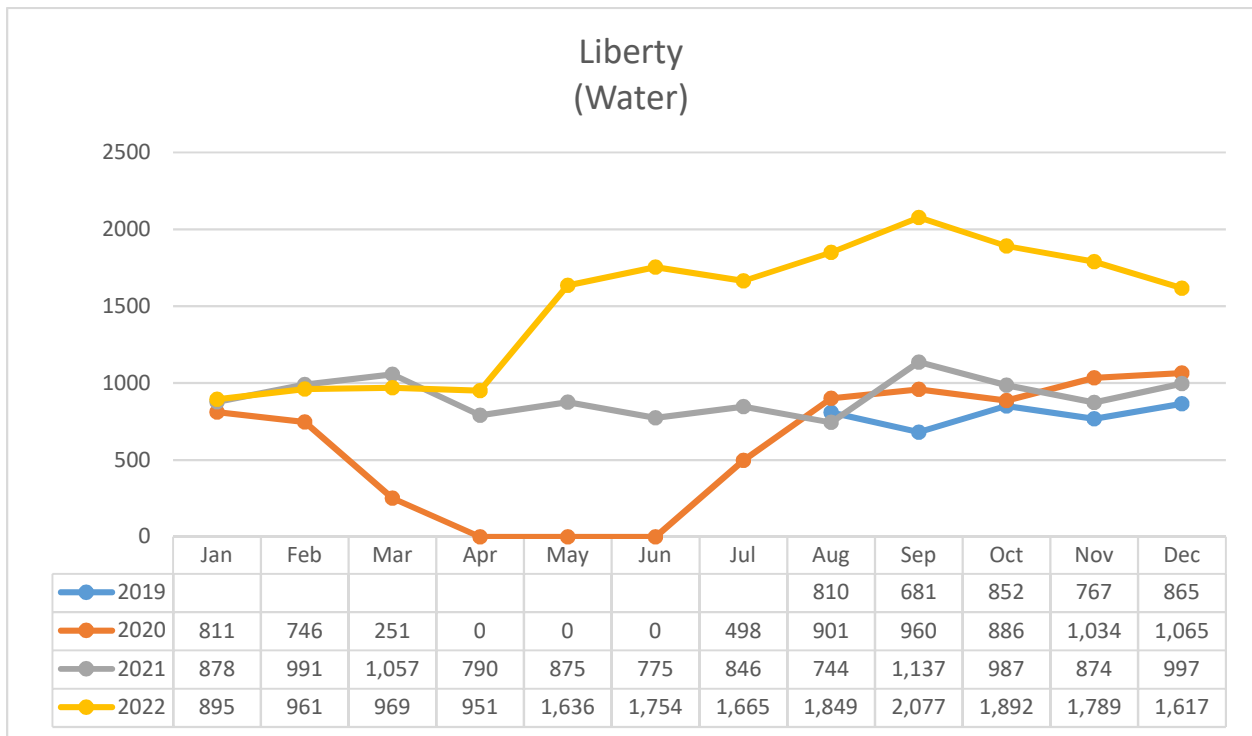
**Question 1 (Liberty - Water)**

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



As shown in the previous graph, Liberty performed 97 disconnections for non-payment in October 2022 versus 5 in October 2021, 64% more in November 2022 versus November 2021, and 67% more in December 2022 versus December 2021. There were approximately 98% more disconnections for non-payment in October 2022 compared to September 2022, 81% fewer in November 2022 compared to October 2022, and 17% fewer in December 2022 compared to November 2022. Liberty projected 3 disconnections for the month of October 2022 but actually disconnected 97. The actual number of disconnections by Liberty for November 2022 was 6% above the projected amount for the same month, and 50% above in December 2022.

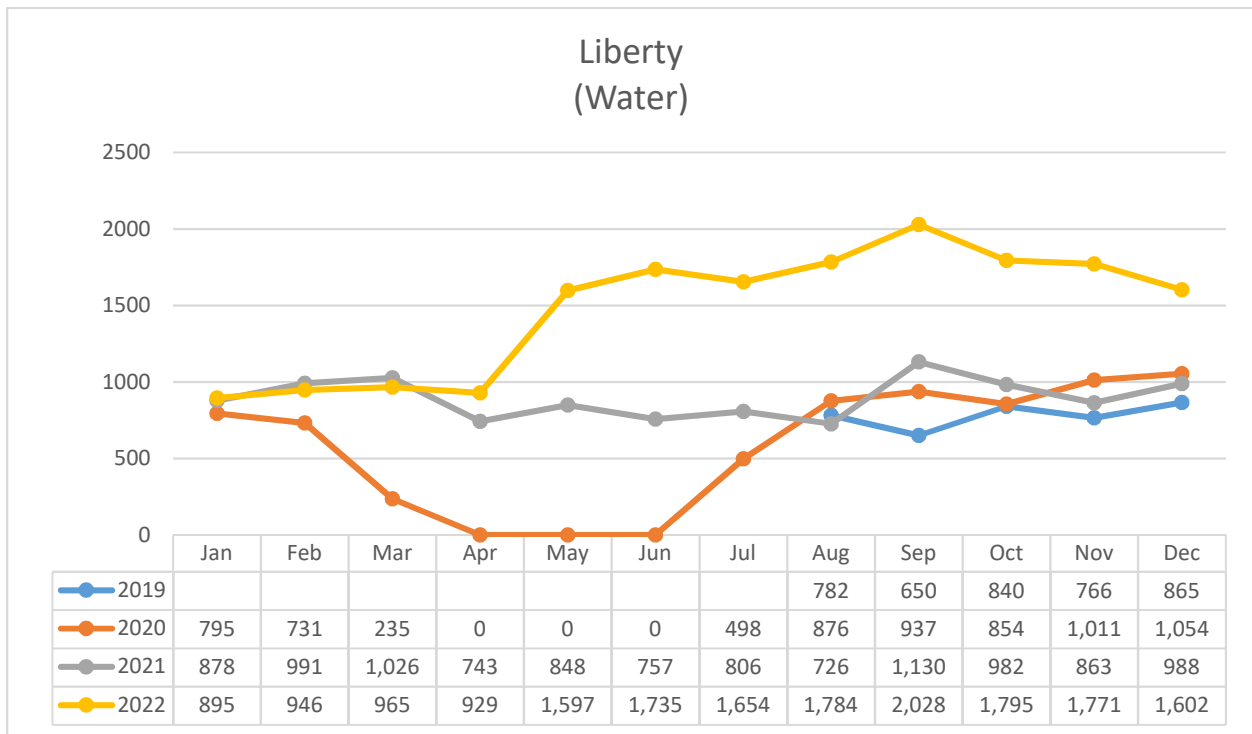
**b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”**



The previous data indicates that there were 92% more Liberty customers with past-due accounts in October 2022 versus October 2021, 105% more in November 2022 versus November 2021, and 62% more in December 2022 versus December 2021. There were approximately 9% fewer customers with past-due accounts in October 2022 compared to September 2022, 5% fewer in November 2022 compared to October 2022, and 10% fewer in December 2022 compared to November 2022. Liberty reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement due date.

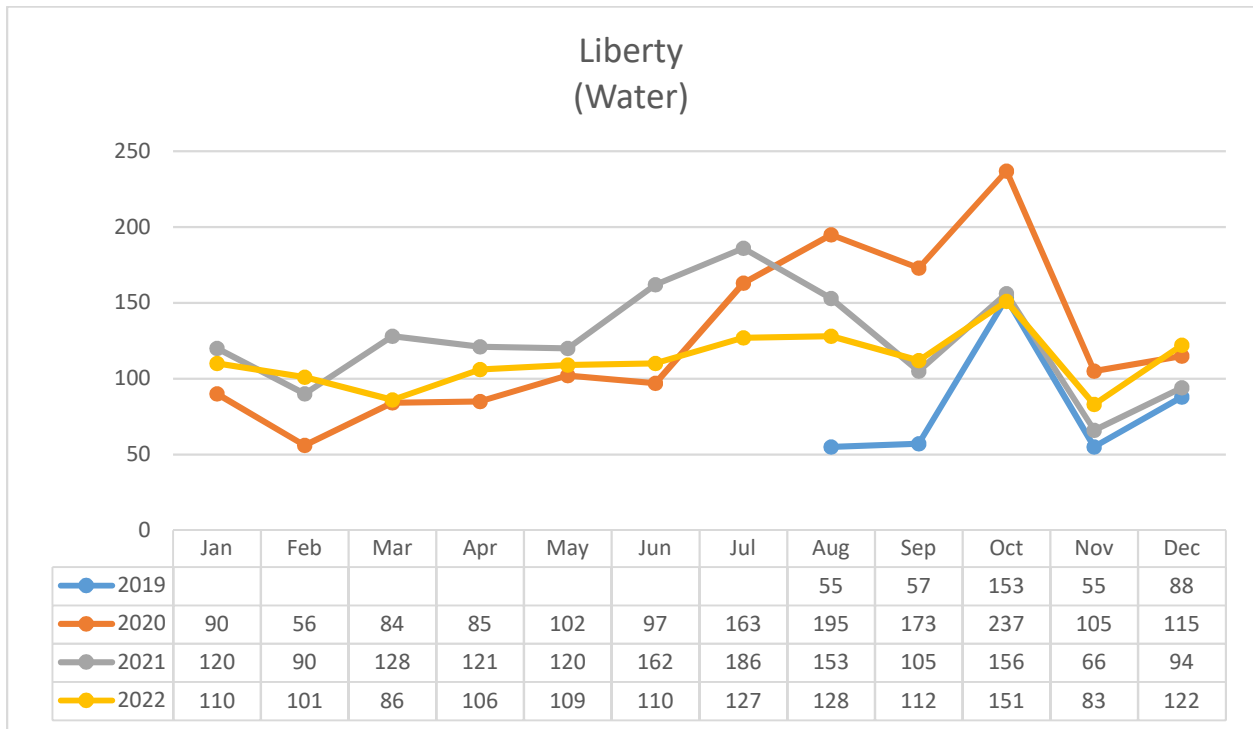


**c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end**



As shown by Liberty’s data, for those customers who received a final disconnection notice there were 83% more customers who were not disconnected in October 2022 versus October 2021, 105% more in November 2022 versus November 2021, and 62% more in December 2022 versus December 2021. There were approximately 11% fewer customers who received a final disconnection in October 2022 compared to September 2022, 1% fewer in November 2022 compared to October 2022, and 10% fewer in December 2022 compared to November 2022.

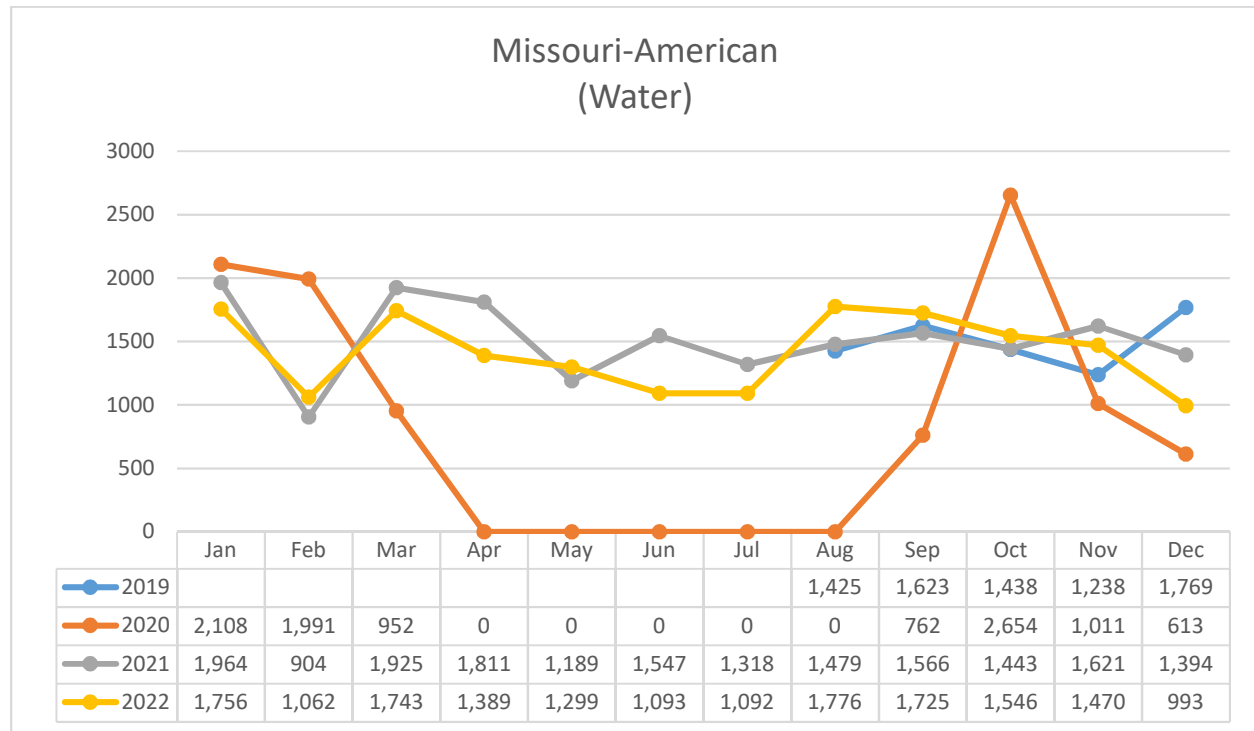
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 3% fewer Liberty customers who participated in payment plans in October 2022 versus October 2021, 26% more in November 2022 versus November 2021, and 30% more in December 2022 versus December 2021. There were about 35% more customers who participated in payment plans in October 2022 compared to September 2022, 45% fewer in November 2022 compared to October 2022, and 47% more in December 2022 compared to November 2022.

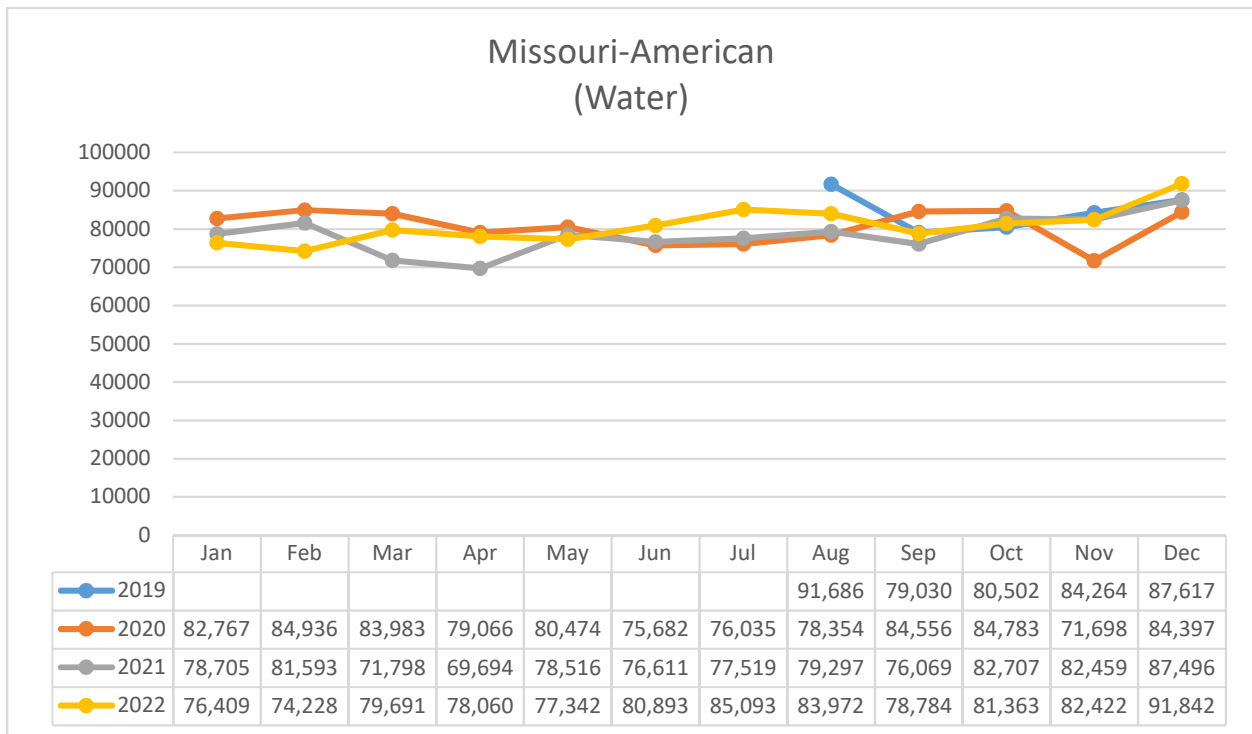
**Question 1 (Missouri-American - Water)**

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



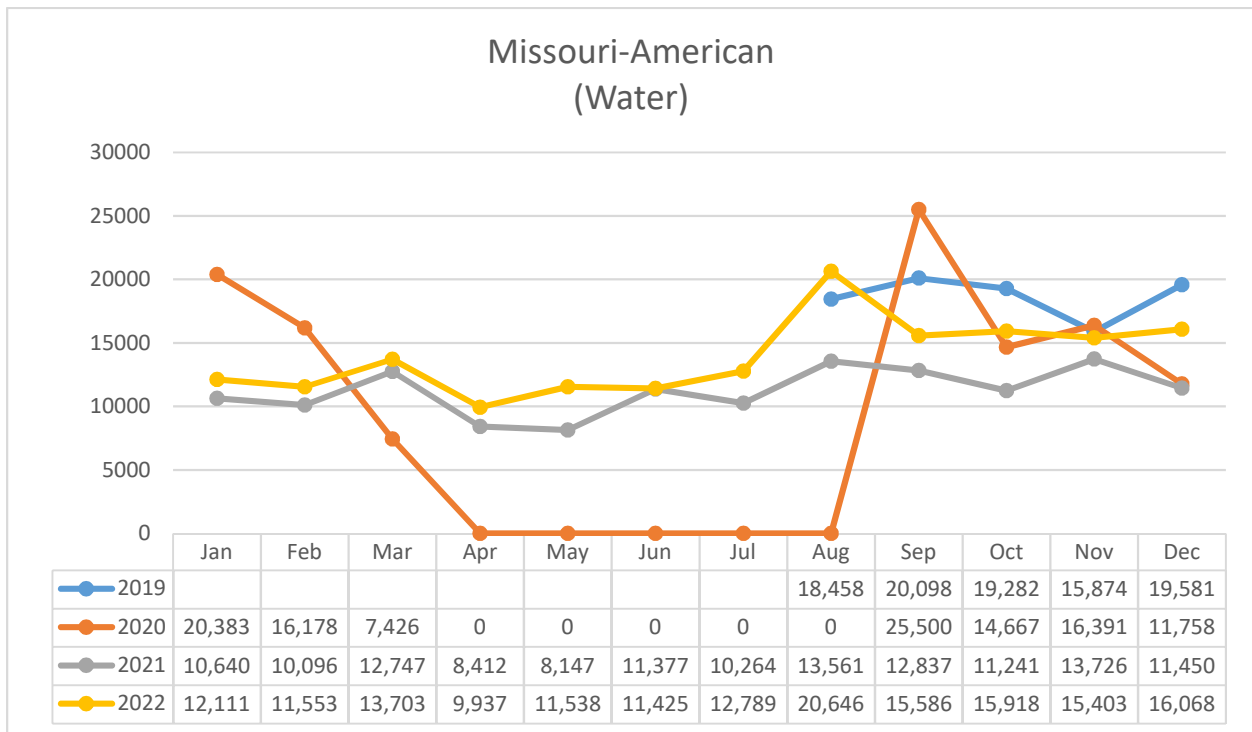
As shown in the previous graph, Missouri-American performed about 7% more disconnections for non-payment in October 2022 versus October 2021, 9% fewer in November 2022 versus November 2021, and 29% fewer in December 2022 versus December 2021. There were 10% fewer disconnections for non-payment in October 2022 compared to September 2022, 5% fewer in November 2022 compared to October 2022, and 32% fewer in December 2022 compared to November 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”**



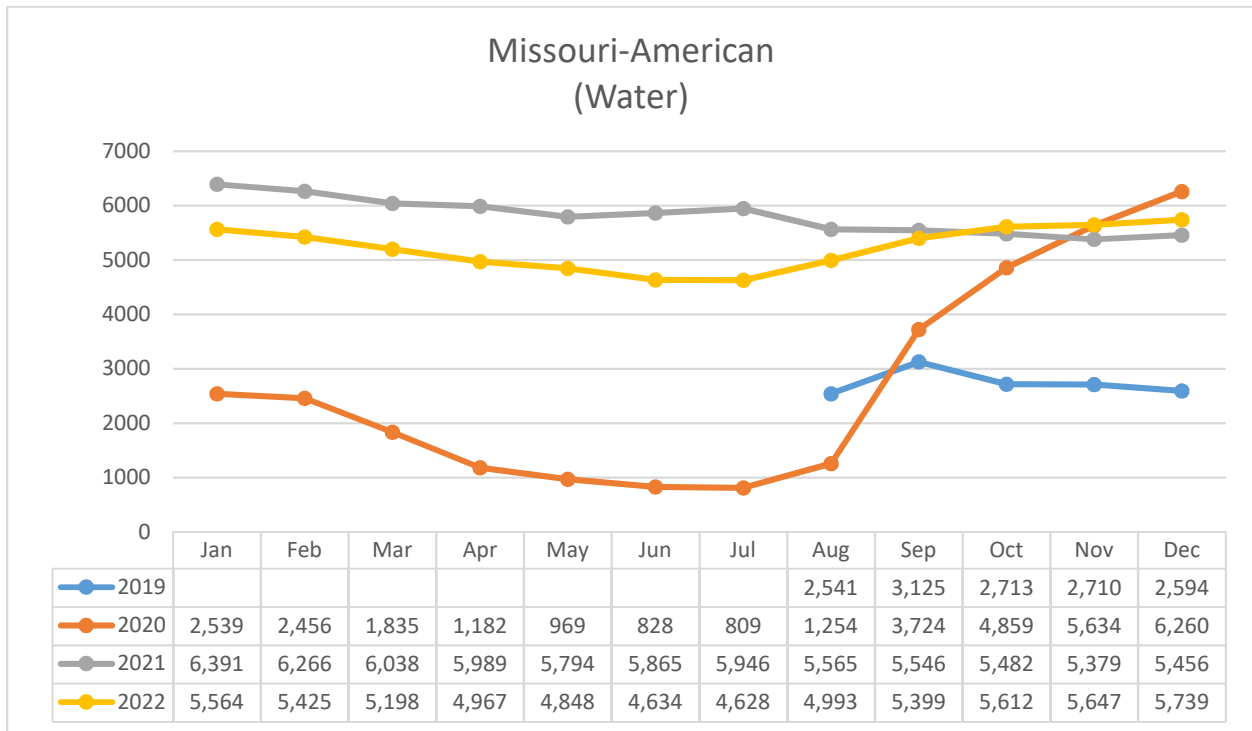
The previous data indicates that there were about 2% fewer Missouri-American customers with past-due accounts in October 2022 versus October 2021, less than 1% fewer in November 2022 versus November 2021, and 5% more in December 2022 versus December 2021. There were approximately 3% more customers with past-due accounts in October 2022 compared to September 2022, 1% more in November 2022 compared to October 2022, and 11% more in December 2022 compared November 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 42% more customers who were not disconnected in October 2022 versus October 2021, 12% more in November 2022 versus November 2021, and 40% more in December 2022 versus December 2021. There were approximately 2% more customers who received a final disconnection notice in October 2022 compared to September 2022, 3% fewer in November 2022 compared to October 2022, and 4% more in December 2022 compared to November 2022.

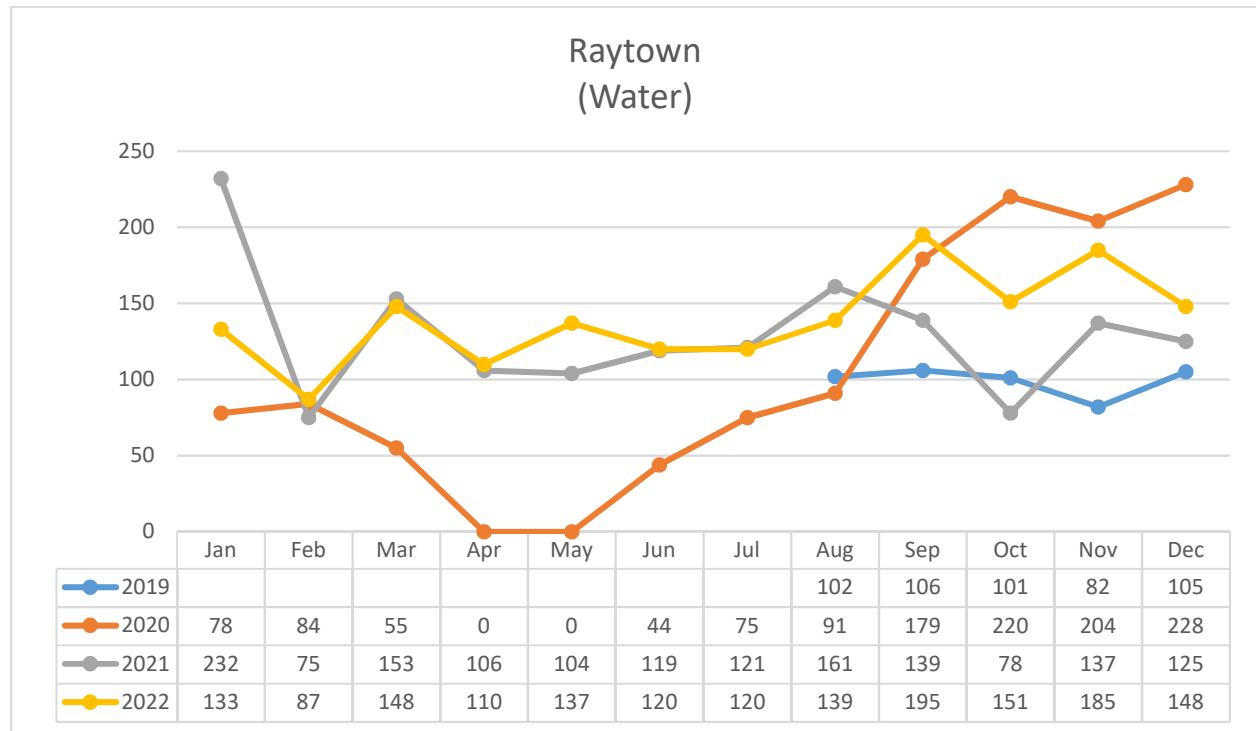
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 2% more Missouri-American customers who participated in payment plans in October 2022 versus October 2021, 5% more in November 2022 versus November 2021, and 5% more in December 2022 versus December 2021. There were 4% more customers who participated in payment plans in October 2022 compared to September 2022, 1% more in November 2022 compared to October 2022, and 2% more in December 2022 compared to November 2022.

**Question 1 (Raytown Water)**

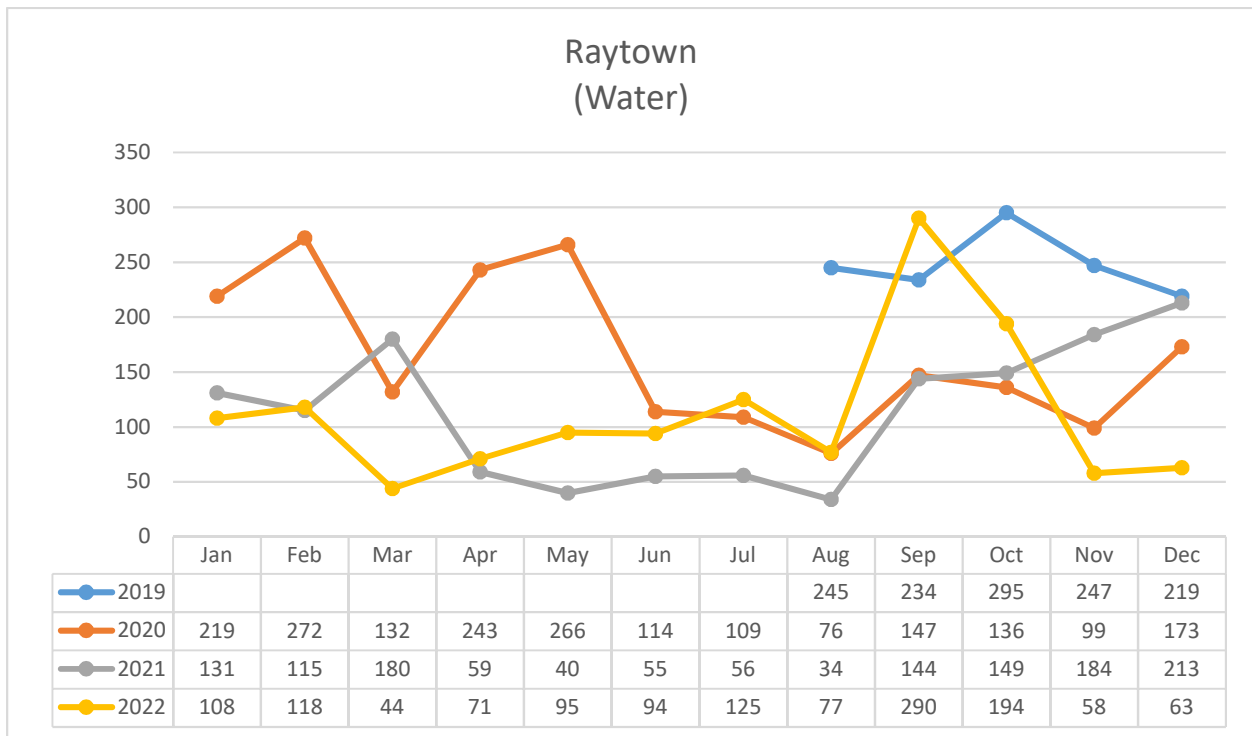
**a) The number of disconnections for non-payment of services as of each month-end<sup>6</sup>**



As shown in the previous graph, Raytown Water performed approximately 94% more disconnections for non-payment in October 2022 versus October 2021, 35% more in November 2022 versus November 2021, and 18% more in December 2022 versus December 2021. There were 23% fewer disconnections for non-payment in October 2022 compared to September 2022, 23% more in November 2022 compared to October 2022, and 20% fewer in December 2022 compared to November 2022. The number of actual disconnections by Raytown in October 2022 was approximately 6% above the amount projected by Raytown for the same month, 26% above for November 2022, and 8% above for December 2022.

<sup>6</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.

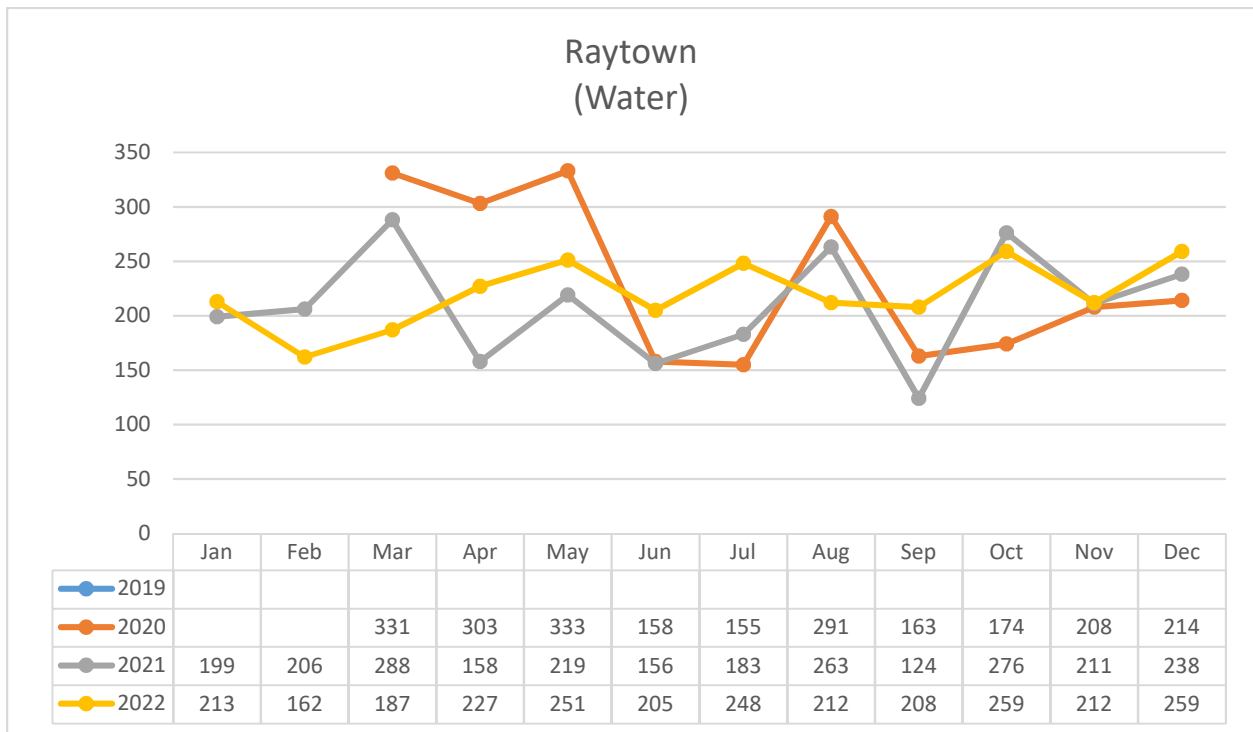
**b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”**



The previous data indicates that there were 30% more Raytown Water customers with past-due accounts in October 2022 versus October 2021, 68% fewer in November 2022 versus November 2021, and 70% fewer in December 2022 versus December 2021. There were 33% fewer customers with past-due accounts in October 2022 compared to September 2022, 70% fewer in November 2022 compared to October 2022, and 9% more in December 2022 compared to November 2022. Raytown Water reported that it defines “past due” as accounts with balances that are over 31 days.

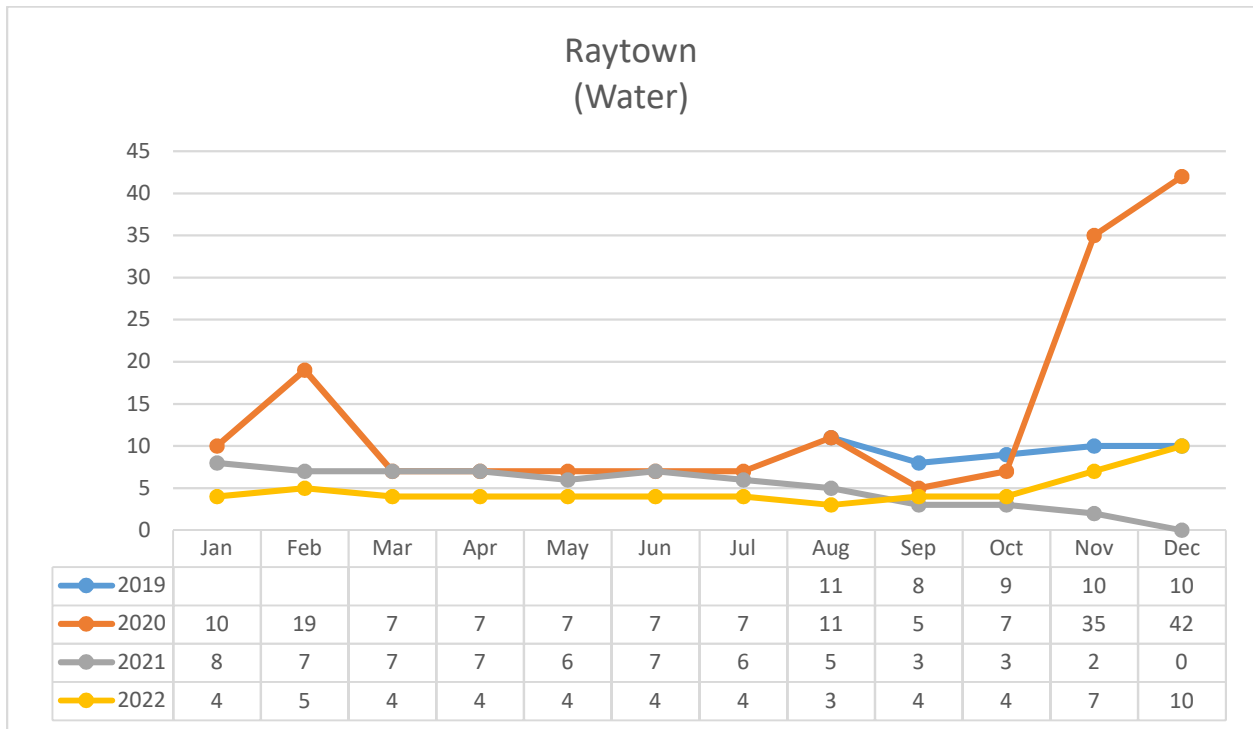


**c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end**



As shown by Raytown Water’s data, for those customers who received a final disconnection notice there were approximately 6% fewer customers who were not disconnected in October 2022 versus October 2021, less than 1% more in November 2022 versus November 2021, and 9% more in December 2022 versus December 2021. There were approximately 25% more customers who received a final disconnection notice in October 2022 compared to September 2022, 18% fewer in November 2022 compared to October 2022, and 22% more in December 2022 compared to November 2022.

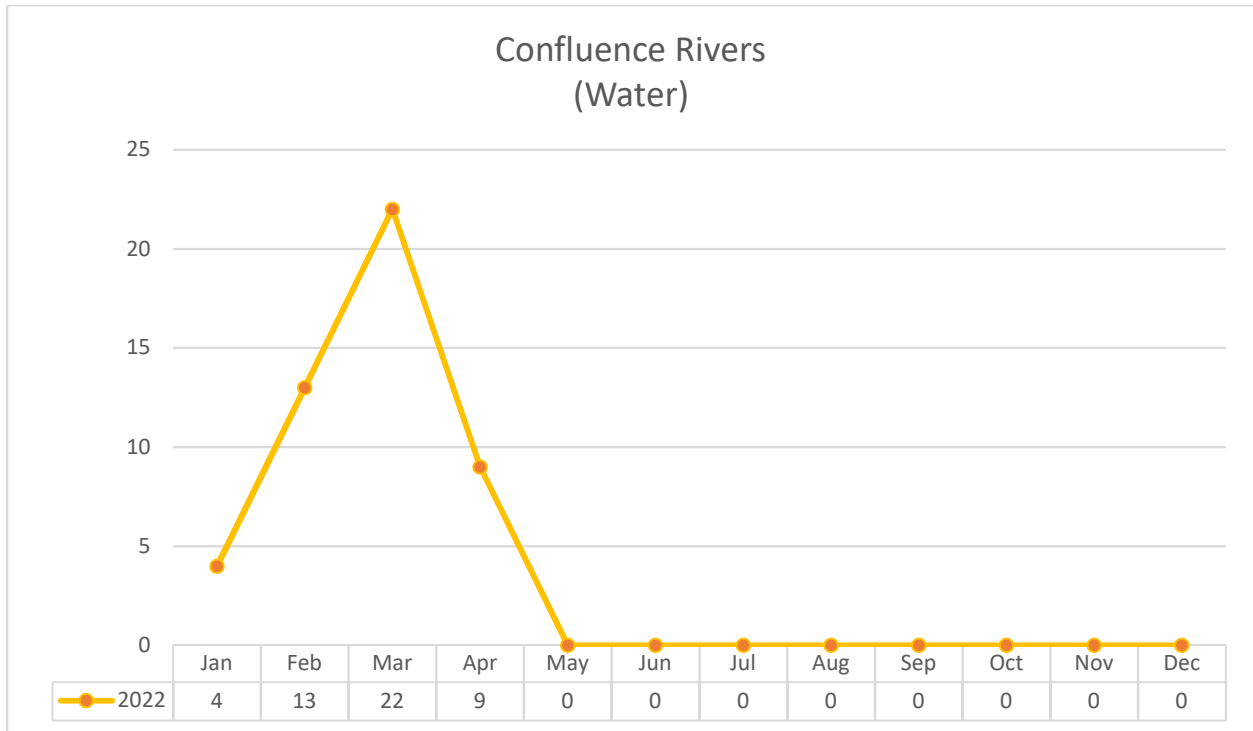
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were 33% more customers of Raytown Water who participated in payment plans in October 2022 versus October 2021, 250% more in November 2022 versus November 2021, and 10 in December 2022 versus 0 in December 2021. There were the same number of customers participating in a payment plan in October 2022 compared to September 2022, 75% more in November 2022 compared to October 2022, and 43% more in December 2022 compared to November 2022.

**Question 1 (Confluence Rivers - Water)<sup>7</sup>**

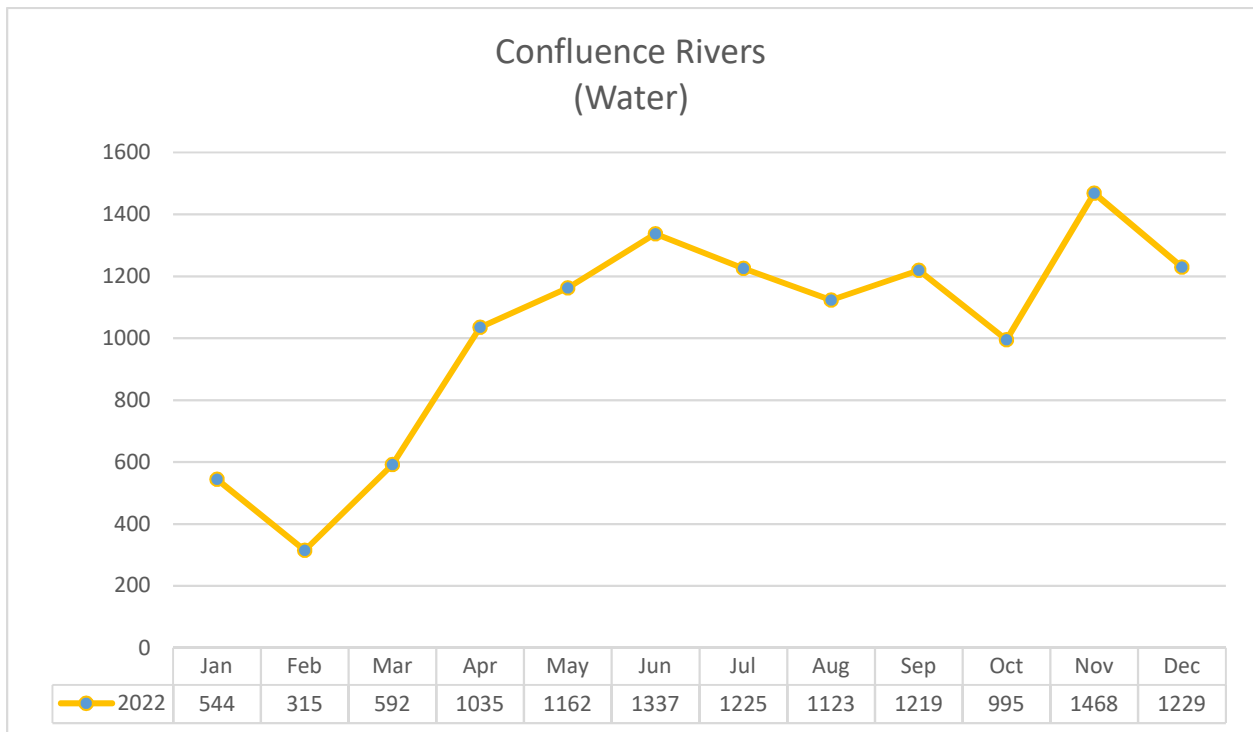
**a) The number of disconnections for non-payment of services as of each month-end**



As shown in the previous graph, Confluence Rivers performed 0 disconnections in October 2022, 0 in November 2022, and 0 in December 2022. Their projected number of disconnections for each of these months was 15.

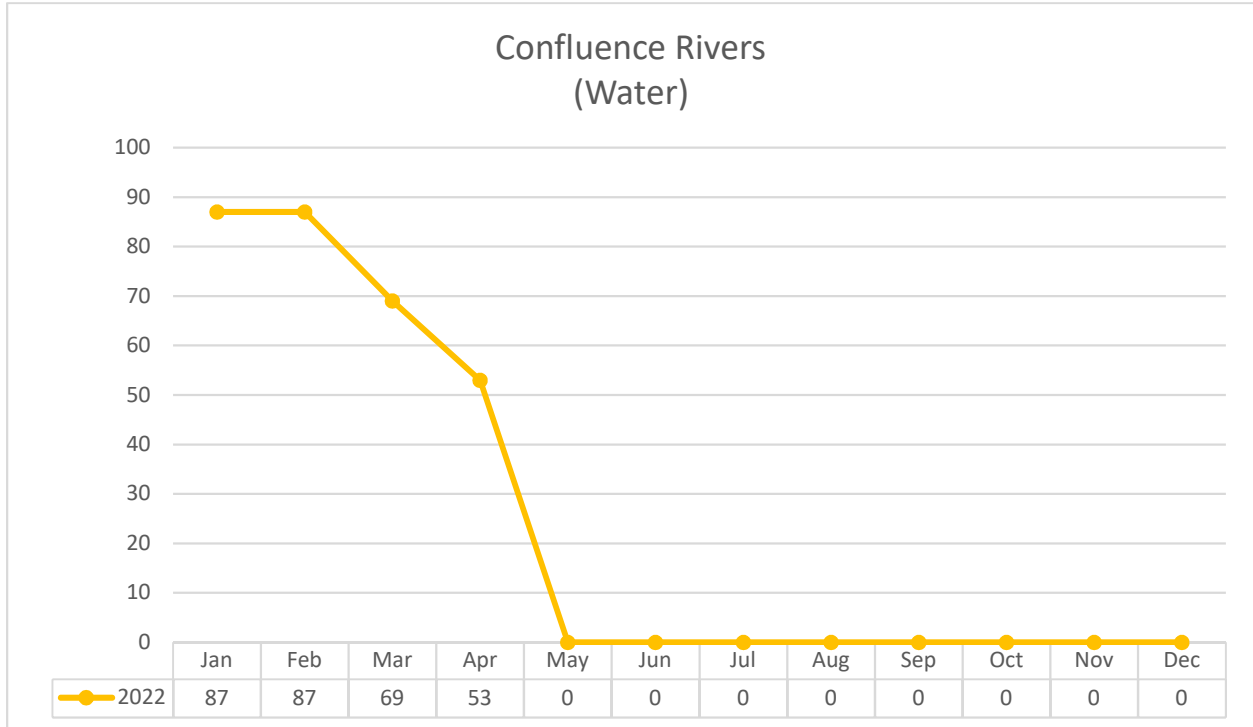
<sup>7</sup> Per Response to Staff Data Request No. 0011.2, Confluence Rivers has adopted a new customer billing platform and, as such, has suspended shut offs and late fees for the time being.

**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”**



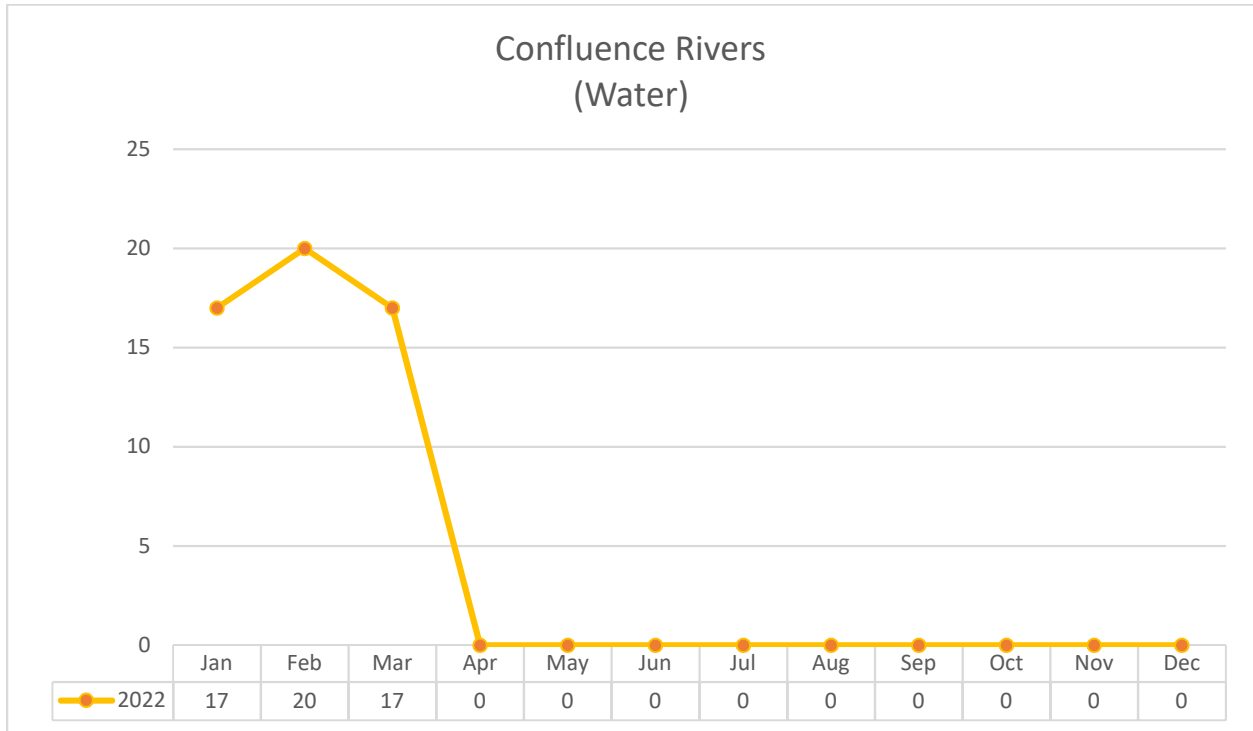
The previous data indicates there were 18% fewer Confluence Rivers’ customers with past-due accounts in October 2022 compared to September 2022, 48% more in November 2022 compared to October 2022, and 16% fewer in December 2022 compared to November 2022. Confluence Rivers reported that it defines “past-due” 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 0 customers who received a final disconnection notice but were not disconnected for non-payment of service in October, November, and December 2022.

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



The previous graph illustrates that there were 0 Confluence Rivers’ customers who participated in payment plans in October, November, and December 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	7737	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	1,400	1,600	3,000	3,500	3,200	3,000	500	125

**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	730	780	1,500	2,400	2,100	2,000	800	100

**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