

**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* (“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. Raytown Water Company was the only utility of the seventeen utilities ordered by the Commission to provide responses for this report that failed to reply to Staff’s initial DRs by updating its information for the September 2021, October 2021, or November 2021 month-ends in a timely manner for inclusion in this report.

9. Per the Commission’s August 11, 2021 Order, starting with the prior month’s 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.

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 21st day of December, 2021.

/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

December 21, 2021

Appendix A

TABLE OF CONTENTS OF 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

Questions 1 & 3 (Ameren Missouri – Electric)	5
Questions 1 & 3 (Empire – Electric)	9
Questions 1 & 3 (Evergy Metro – Electric)	13
Questions 1 & 3 (Evergy West – Electric)	17
Questions 1 & 3 (Ameren Missouri – Gas)	21
Questions 1 & 3 (Spire - Gas).....	25
Questions 1 & 3 (Summit - Gas)	29
Questions 1 & 3 (Empire - Gas).....	33
Questions 1 & 3 (Liberty (MNG) - Gas)	37
Questions 1 & 3 (Liberty - Water).....	41
Questions 1 & 3 (Missouri-American - Water)	45
Questions 1 & 3 (Raytown Water)	49
Questions 1 & 3 (Confluence Rivers - Water).....	53
Questions 1 & 3 (Elm Hills - Water)	57
Questions 1 & 3 (Hillcrest - Water).....	61
Questions 1 & 3 (Indian Hills - Water)	65
Questions 1 & 3 (Raccoon Creek - Sewer).....	69

Question 2	72
Ameren Missouri (Electric).....	72
Empire (Electric).....	73
Evergy Metro (Electric).....	73
Evergy West (Electric).....	73
Ameren Missouri (Gas)	74
Spire (Gas)	74
Summit (Gas).....	74
Empire (Gas)	74
Liberty (MNG) (Gas).....	75
Liberty (Water)	75
Missouri-American (Water).....	75
Raytown Water	75
Confluence Rivers (Water).....	76
Elm Hills (Water)	76
Hillcrest (Water)	76
Indian Hills (Water).....	77
Raccoon Creek (Sewer)	77

Staff Report on Utility Data Request Responses in

File No. AW-2020-0356

On August 19, 2020, the Missouri Public Service Commission (“Commission” or “PSC”) issued its *Order Directing Staff to Gather Information about Utility Disconnections*. In its Order, the Commission directed Staff to gather information from the state’s utilities regarding current levels of disconnections for non-payment, anticipated levels of such disconnections by those utilities in the next six months, number of customers with past-due accounts, number of customers that have received a final disconnection notice, and number of customers participating in payment plans. The Staff was then directed to file a report to share its findings no later than September 21, 2020. The Commission also directed the Staff to file monthly updates to the report on the 15th day of each following month.¹ This report represents the fifteenth such update, incorporating information through the end of November 2021 when available.

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

1) (a) the number of disconnections for non-payment of services as of each month-end; (b) the number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due;” (c) the number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end; and (d) the number of customers at each month-end participating in payment plans. 2) Please provide your company’s estimate of the number of disconnections for non-payment of service for the six-month period of September 2020 through February 2021, with an explanation of the methodology and

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

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

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

In a subsequent December 2, 2020, Order, the Commission directed the Staff to continue filing monthly report updates until further notice. Since the utilities were originally directed to file monthly updates for Question 2) and Question 3) through February 2021, the Staff issued updated data requests for Question 2) from March through August 2021 and Question 3) from March through July 2021, since Staff had already received actual August 2021 Question 3) data from all of the utilities.

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". This order directed Staff to continue to gather information provided in previous reports, but to also include a baseline in the graphs for questions 1 and 3 showing the monthly average values prior to the pandemic. This adjustment will be shown in the report below. Staff also issued updated data requests for Question 2) from September 2021 through February 2022.

For purposes of this updated report, the following utilities responded to this Staff data request with month-end November 2021 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”) Confluence Rivers Utility Operating Company, Inc. (“Confluence Rivers – Water”), Elm Hills Utility Operating Company, Inc. (“Elm Hills – Water”), Hillcrest Utility Operating Company, Inc. (“Hillcrest – Water”), Indian Hills Utility Operating Company, Inc. (“Indian Hills – Water”), and Raccoon Creek Utility Operating Company, Inc. (“Raccoon Creek – Sewer”).

The following utilities did not respond to the Staff data request with month-end September 2021, October 2021, or November 2021 data: The Raytown Water Company (“Raytown Water”). Information for Raytown Water will be provided through month-end August 2021 in this report.

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. The previous information obtained from the separate entities will remain in the report. Moving forward, information will be collected as a whole for Confluence Rivers Utility Operating Company, Inc. The data collected after the effective date of the merger is expected to be included in the January 22, 2021 report.

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

The information reported below for Questions 1 and 3 is presented for the period August 2019 through July 2020 (grey dots and line), for the period of August 2020

through July 2021 (orange dots and line) and August 2021 through October 2021 (blue dots and line). As this report is updated in the future, the blue 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 November 2021 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 November 2021 compared to October 2021). It will also compare the percentage change for each category of information for the current month versus the same month, pre-pandemic.

Summary of Responses to Questions 1 and 3

For question 1a and 3a, most of the utilities reported decreases in the number of customer disconnections in November 2021 compared to the previous month (October 2021) and to November 2020. More utilities had increases than experienced decreases in the number of disconnections in November 2021 compared to pre-pandemic levels (November 2019).

For Question 1b and 3b, most of the responding utilities did not show a big change in the number of past-due customer accounts in November 2021 compared to October 2021 and November 2020. Most utilities showed an increase in past-due accounts in November 2021 compared to the same month two years ago.

For Question 1c and 3c, about the same number of utilities reported increases and decreases in November 2021 compared to the previous month in the number of customers who have received final disconnection notices, but have not yet been disconnected. Most of the utilities reported decreases in this metric in November 2021 compared to the same month in 2020 and 2019.

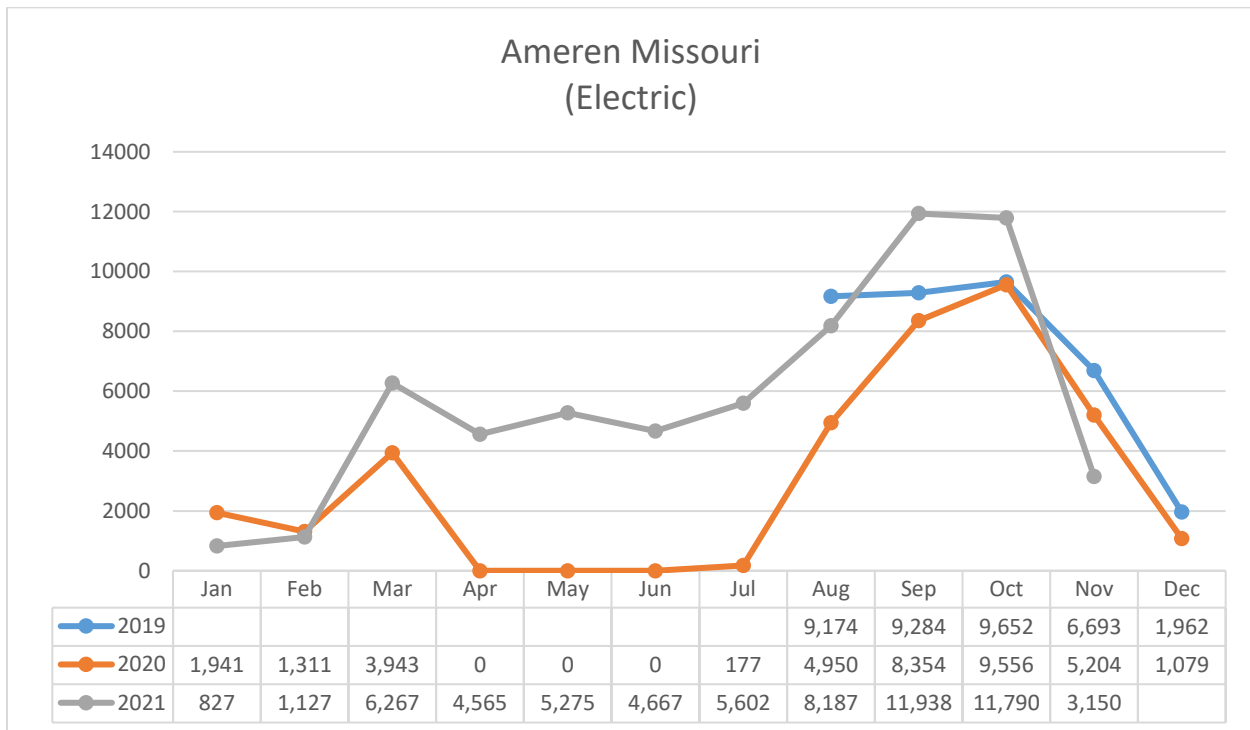
Regarding Question 1d and 3d, most utilities reported increases in the number of customers participating in payment plans in November 2021 compared to October 2021 and November 2019.

However, more utilities reported decreases in this metric in November 2021 compared to November 2020.

Individual Utility Responses:

Questions 1 & 3 (Ameren Missouri – Electric)³

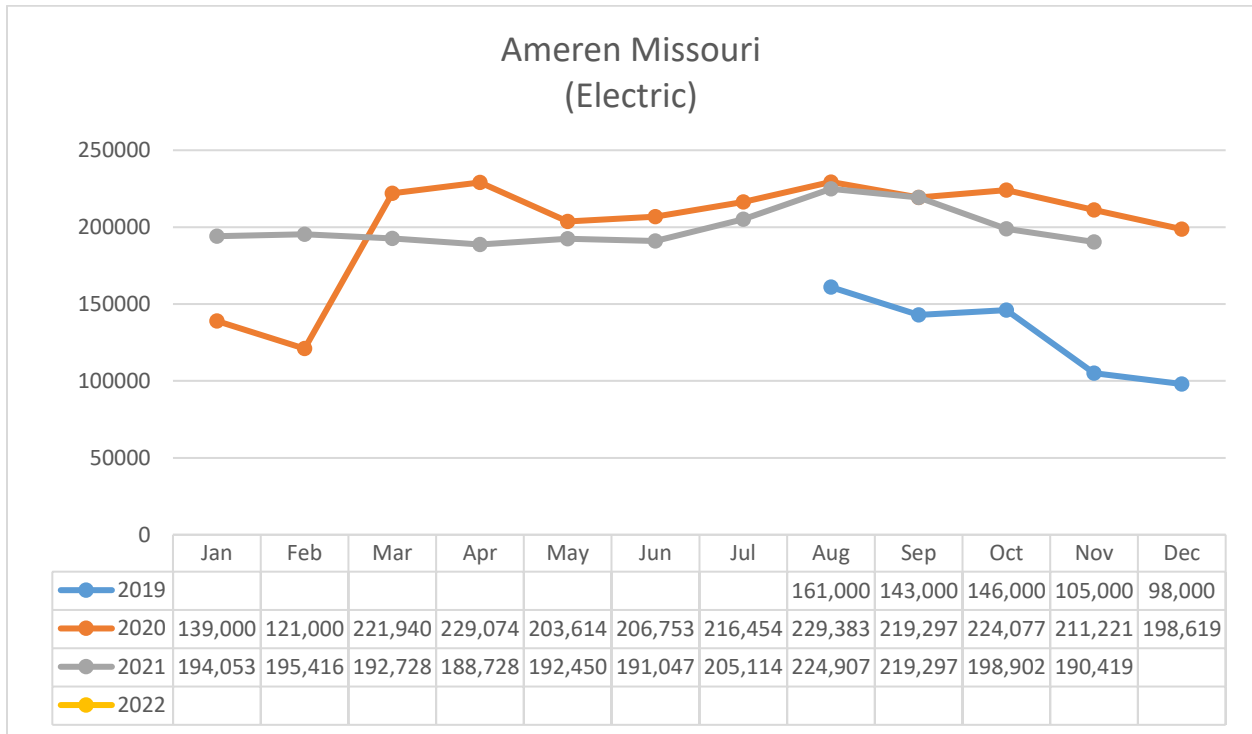
a) The number of disconnections for non-payment of services as of each month-end



As shown in the previous graph, Ameren Missouri had 39% fewer disconnections for non-payment in November 2021 versus in November 2020 and about 73% fewer in November 2021 than in October 2021. The number of actual disconnections by Ameren Missouri in October 2021 was approximately 48% below the amount projected by Ameren Missouri for the same month. There were 53% less disconnections for non-payment in November 2021 versus pre-pandemic, November 2019.

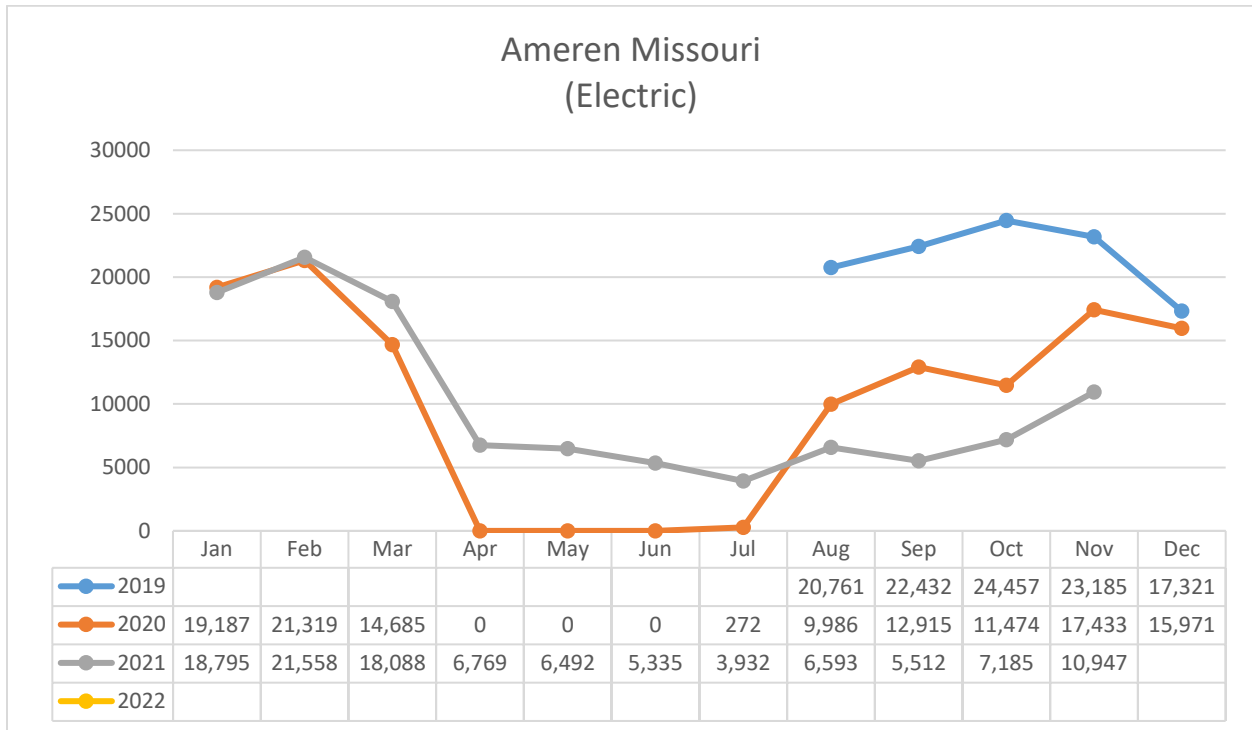
³ Per Data Request Response No. 0004.1s8 from Ameren, the numbers contained in previous DR responses were updated. Remote disconnects were enabled and are now being captured in the data. The data was updated in October and the numbers will be accurate moving forward.

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”



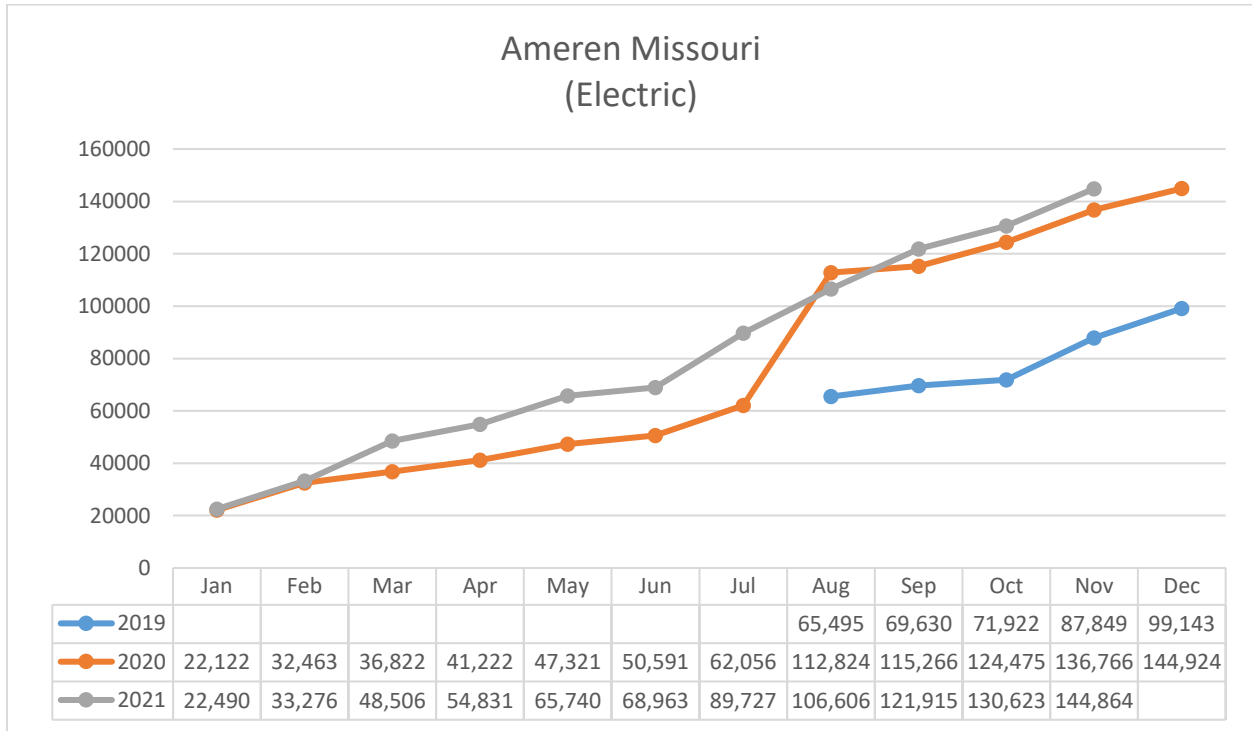
The previous data indicates that there were approximately 10% fewer Ameren Missouri customers with past-due accounts in November 2021 versus November 2020 and 4% fewer in November 2021 than in October 2021. There were 81% more customers with past-due accounts in November 2021 versus pre-pandemic, November 2019. 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 37% fewer customers who were not disconnected in November 2021 versus in November 2020 and approximately 52% more in November 2021 than in October 2021. There were 53% fewer customers who received a final disconnection notice, but have not been disconnected for non-payment in November 2021 versus pre-pandemic, November 2019.

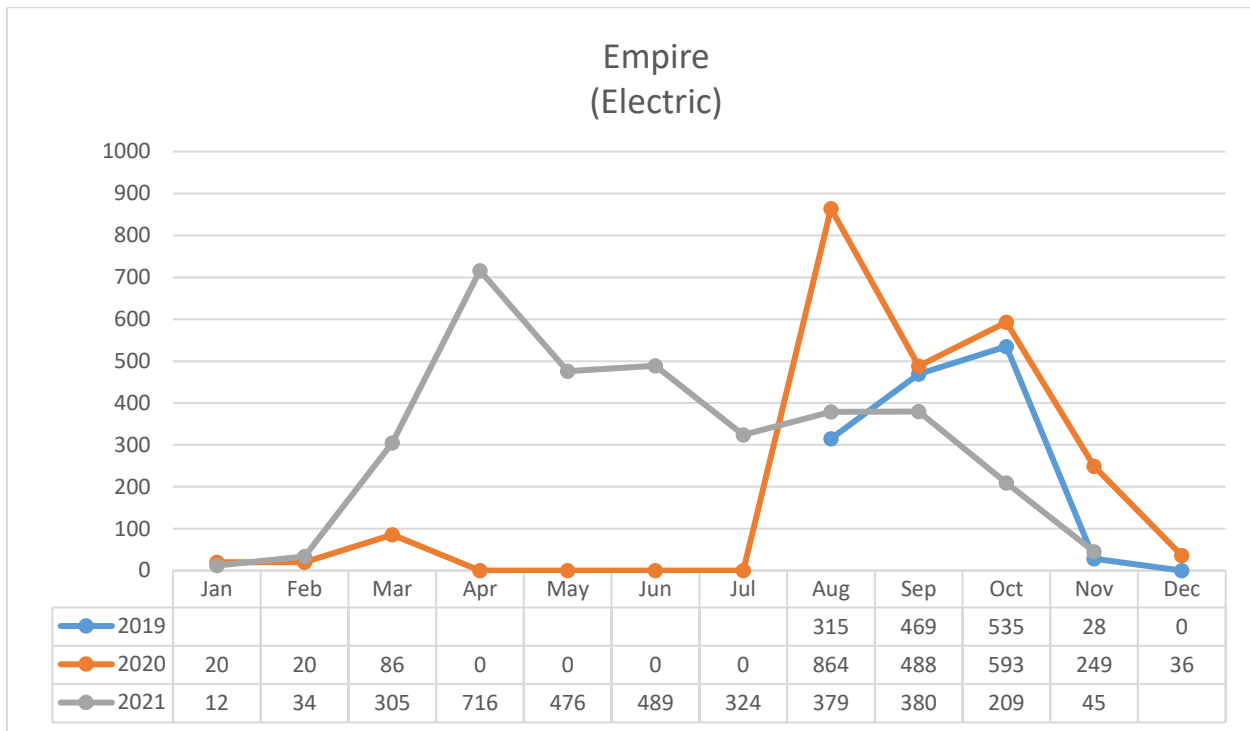
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 6% more Ameren Missouri customers who participated in payment plans in November 2021 versus November 2020 and about 11% more in November 2021 than in October 2021. There were approximately 65% more customers who participated in payment plans in November 2021 versus pre-pandemic, November 2019.

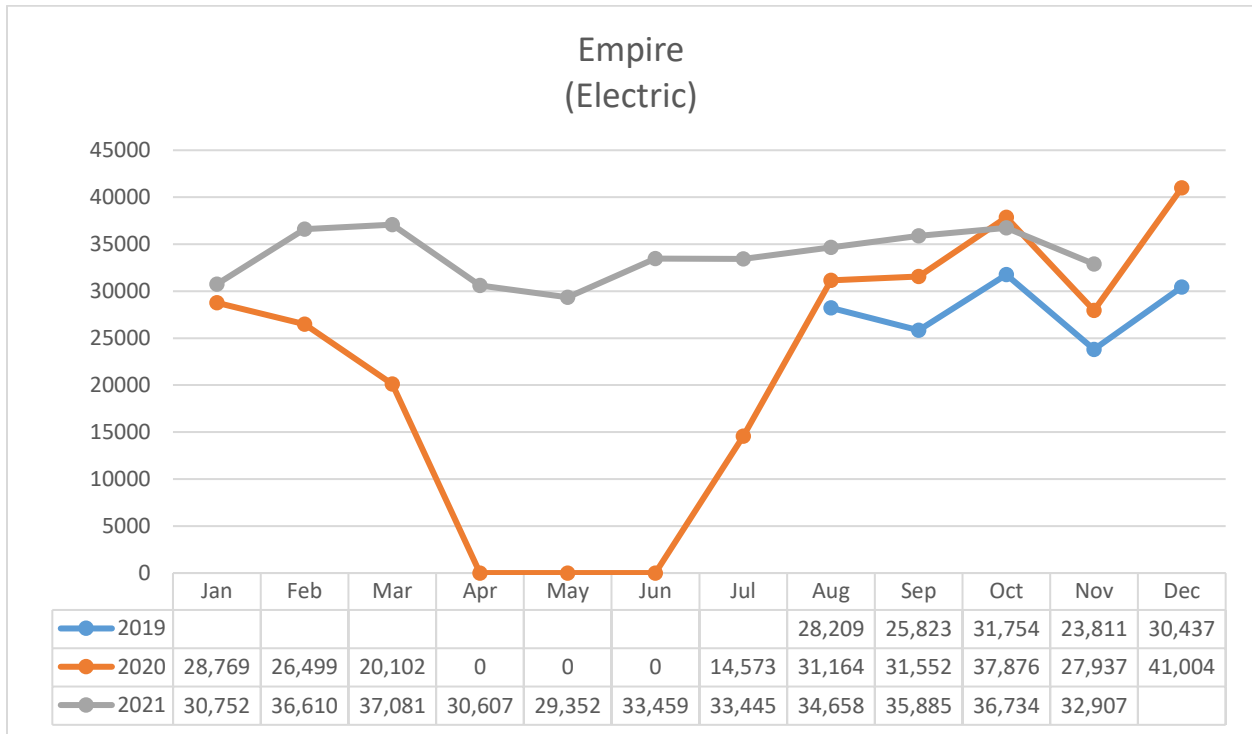
Questions 1 & 3 (Empire – Electric)

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



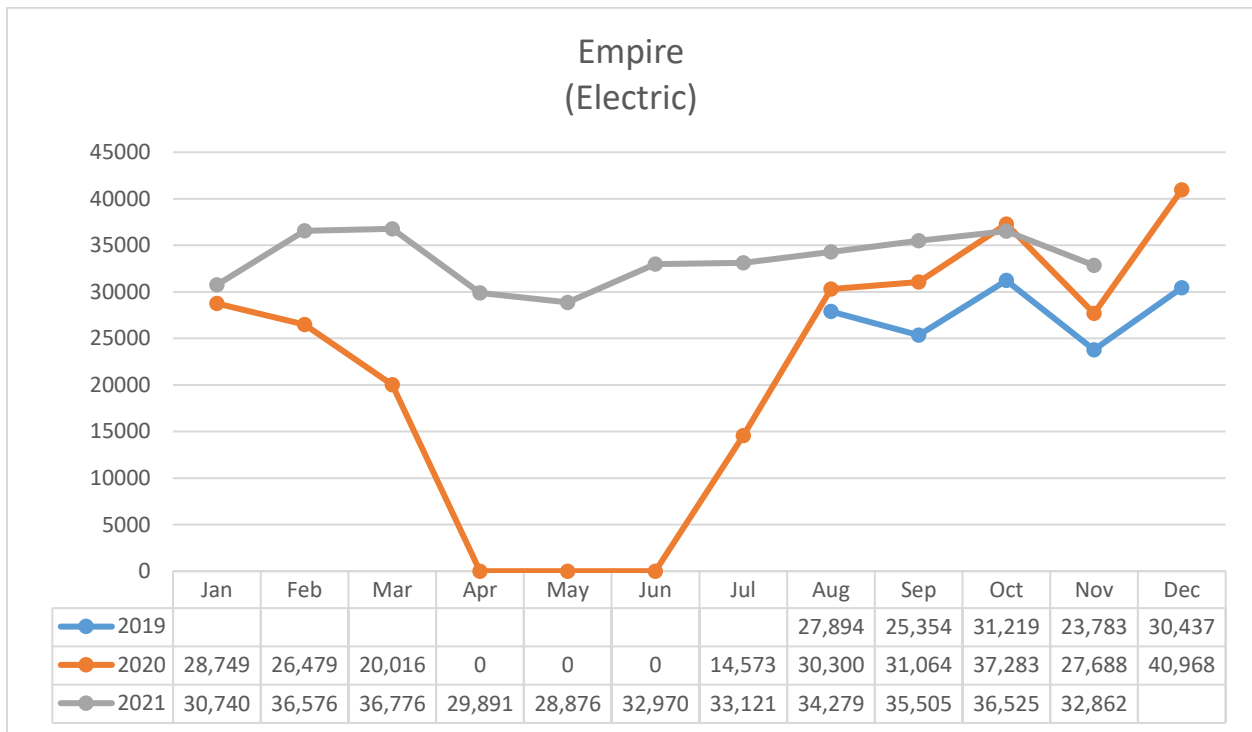
As shown in the previous graph, Empire performed approximately 82% fewer disconnections for non-payment in November 2021 versus November 2020 and about 78% fewer in November 2021 than in October 2021. The number of actual disconnections by Empire in November 2021 was 82% below the amount projected by Empire for the same month. There were about 61% more disconnections for non-payment of services in November 2021 versus pre-pandemic, November 2019.

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”



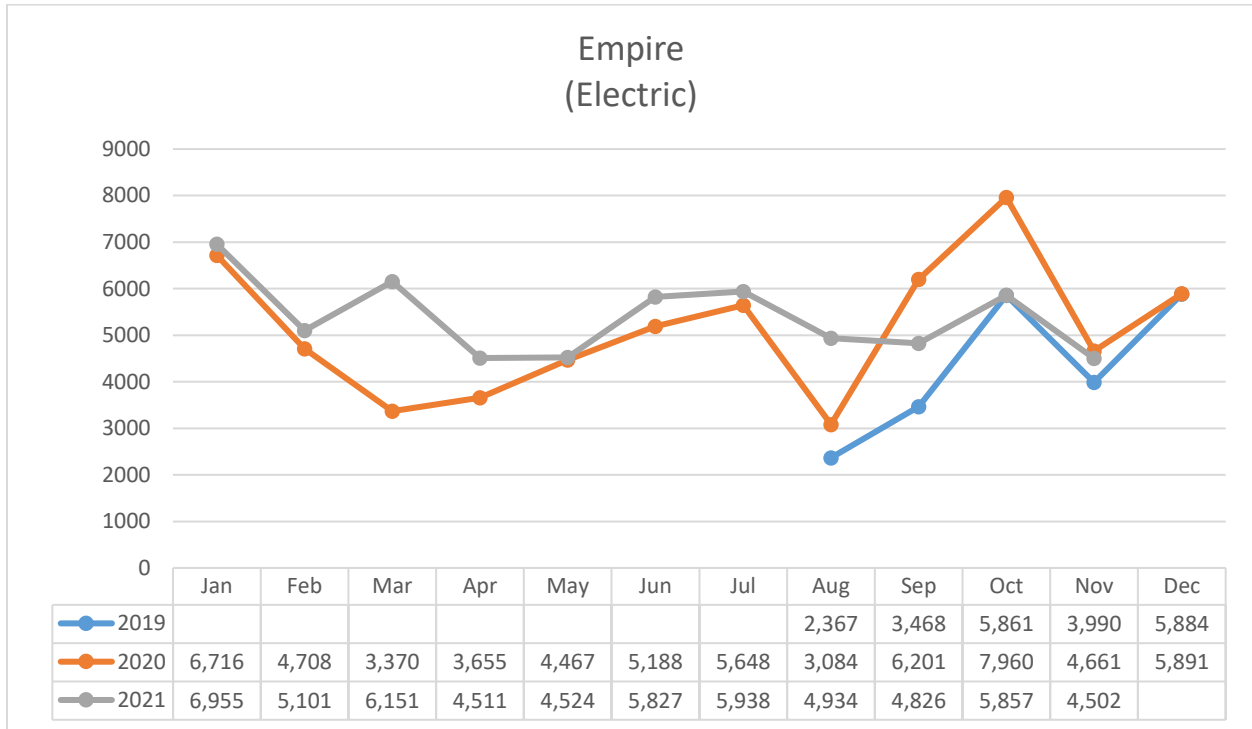
The previous data indicates that there were 18% more Empire customers with past-due accounts in November 2021 versus November 2020 and about 10% fewer customers with past-due accounts in November 2021 compared to October 2021. There were approximately 38% more customers with past-due accounts in November 2021 versus pre-pandemic, November 2019. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement due date.

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



As shown by Empire’s data, for those customers who received a final disconnection notice there were about 19% more customers who were not disconnected in November 2021 versus November 2020 and approximately 10% fewer in November 2021 than in October 2021. There were 38% more customers who received a final disconnection notice, but have not been disconnected in November 2021 versus pre-pandemic, November 2019.

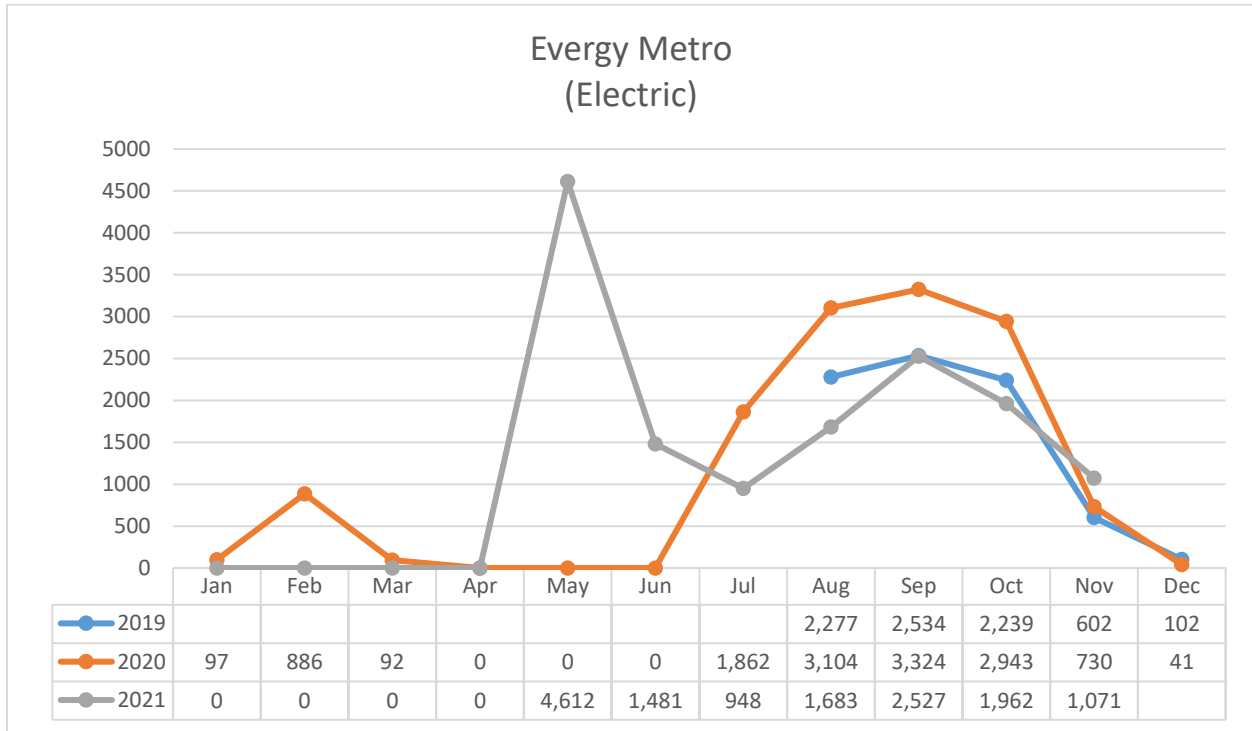
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 3% fewer Empire customers who participated in payment plans in November 2021 versus November 2020 and about 23% fewer in November 2021 than in October 2021. There were 13% more customers participating in payment plans in November 2021 versus pre-pandemic, November 2019.

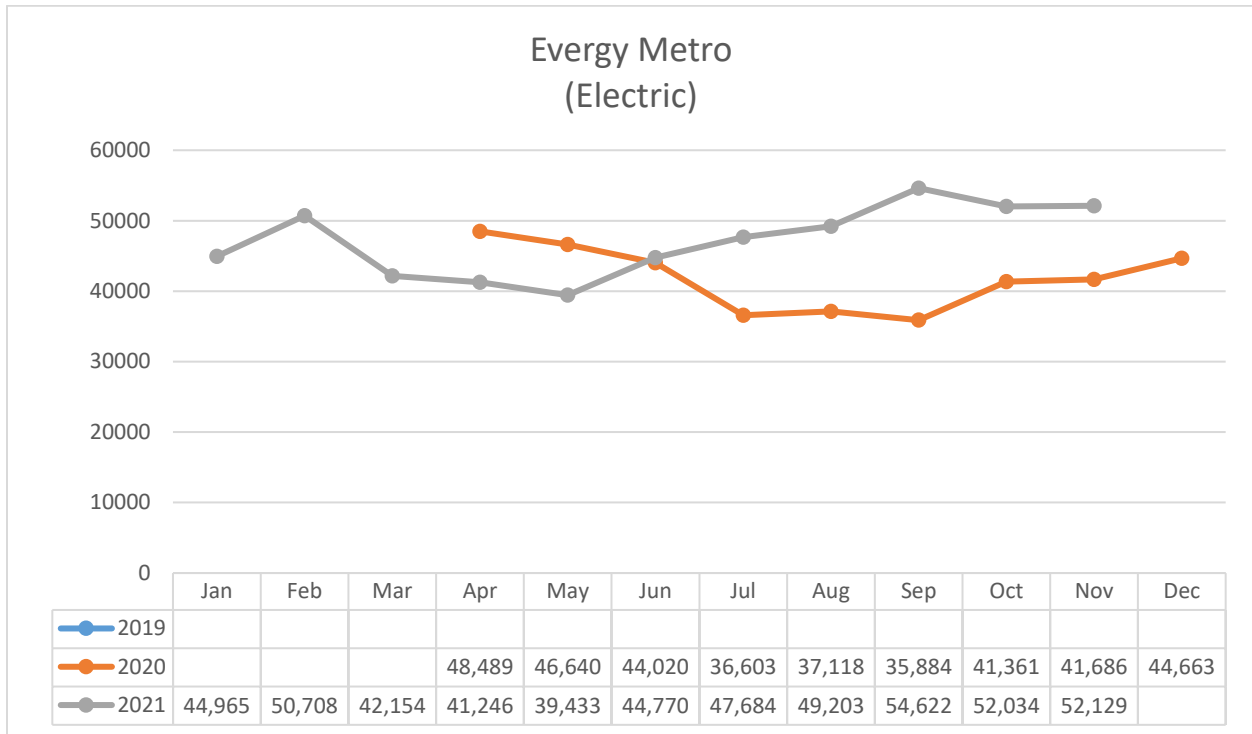
Questions 1 & 3 (Evergy Metro – Electric)

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



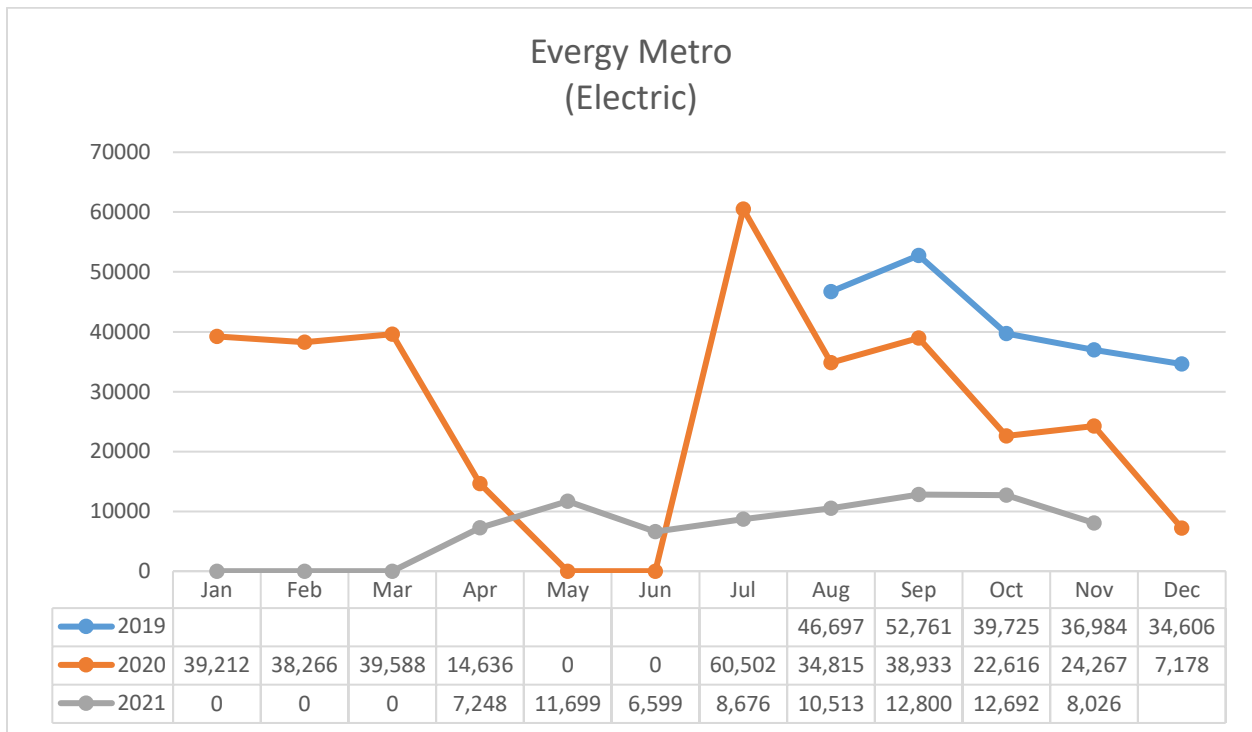
As shown in the previous graph, Evergy Metro performed 47% more disconnections for non-payment in November 2021 versus November 2020 and about 45% fewer in November 2021 than in October 2021. The number of actual disconnections by Evergy Metro in November 2021 was about 189% above the amount projected by Evergy Metro for the same month. There were approximately 78% more disconnections for non-payment in November 2021 versus pre-pandemic, November 2019.

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”



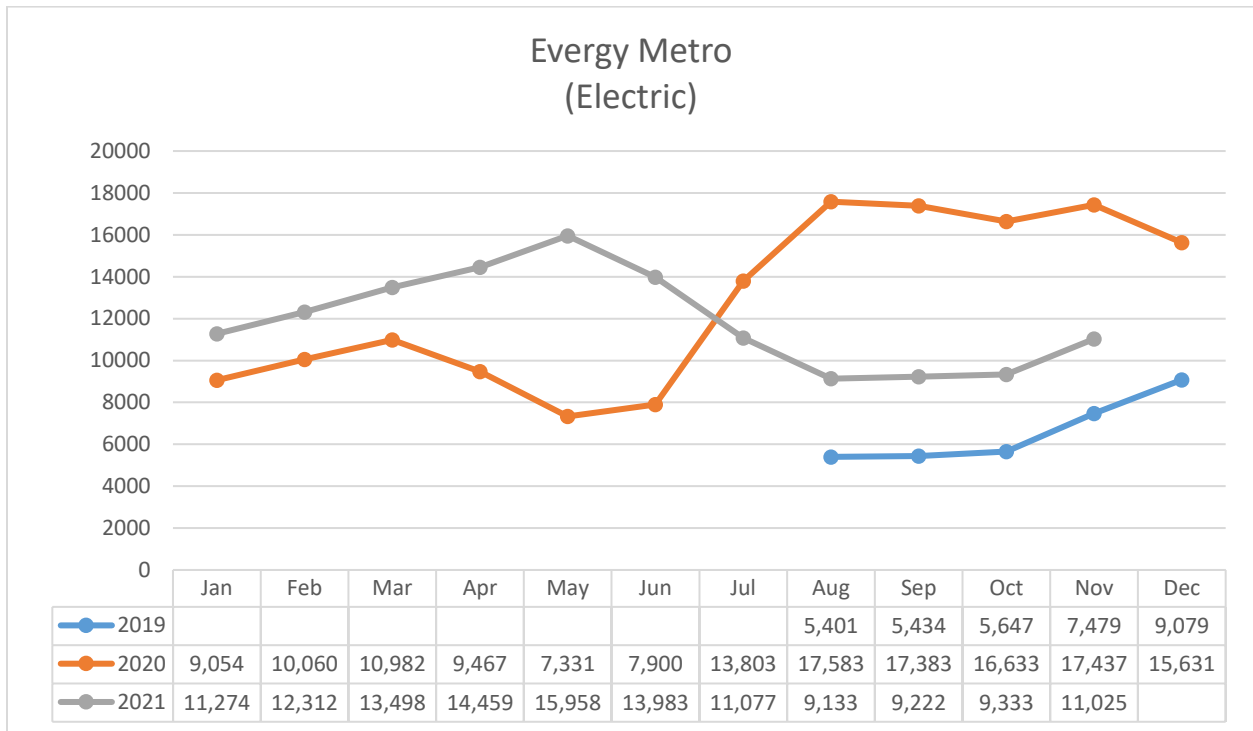
The previous data indicates that there were 25% more Evergy Metro customers with past-due accounts in November 2021 versus November 2020 and less than 1% more in November 2021 than in October 2021. Staff is unable to compare current past-due accounts to pre-pandemic past-due account numbers as Evergy Metro was unable to provide historical data from August 2019 – March 2020. Evergy Metro defines past-due accounts as accounts that are more than 30 days in arrears.

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



As shown by Evergy Metro’s data, for those customers who received a final disconnection notice, there were 67% fewer customers who were not disconnected in November 2021 versus November 2020 and approximately 37% fewer customers in November 2021 than in October 2021. There were 78% fewer customers who received a final disconnection notice, but have not been disconnected for non-payment in November 2021 versus pre-pandemic, November 2019.

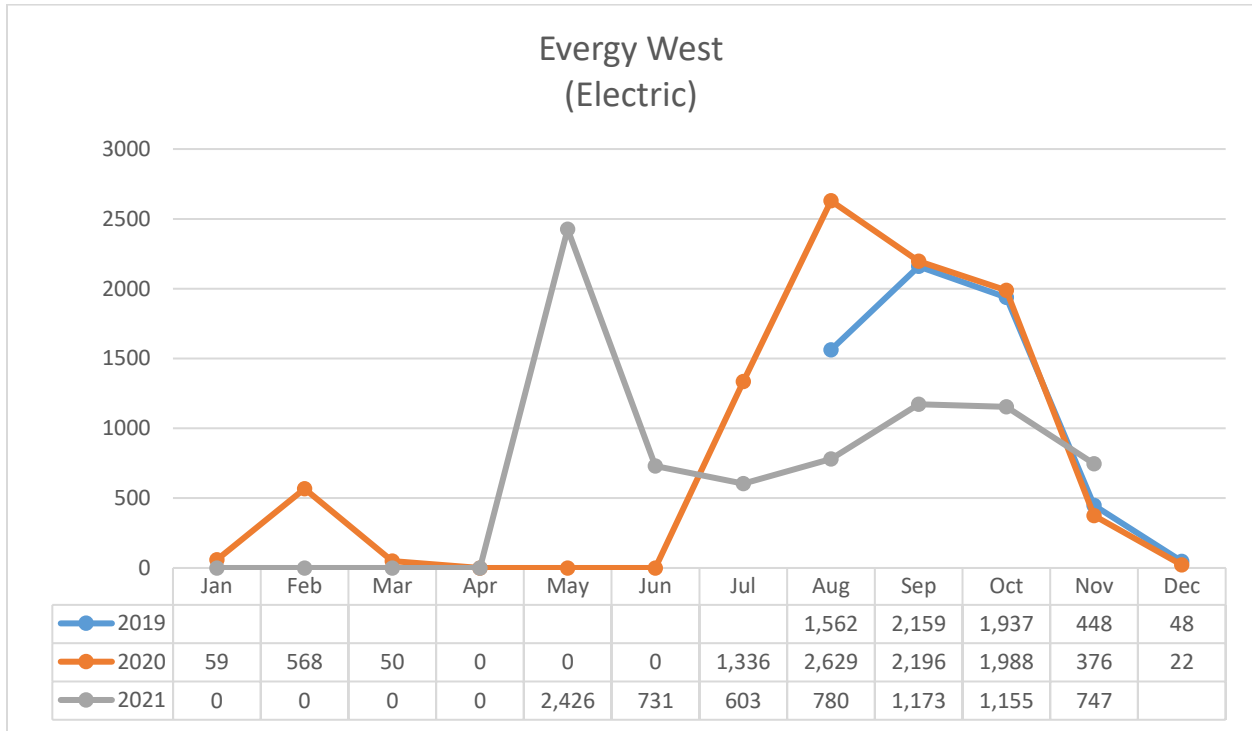
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 37% fewer Evergy Metro customers who participated in payment plans in November 2021 versus November 2020 and about 18% more in November 2021 than in October 2021. There were 47% more customers participating in payment plans at month-end in November 2021 versus pre-pandemic, November 2019.

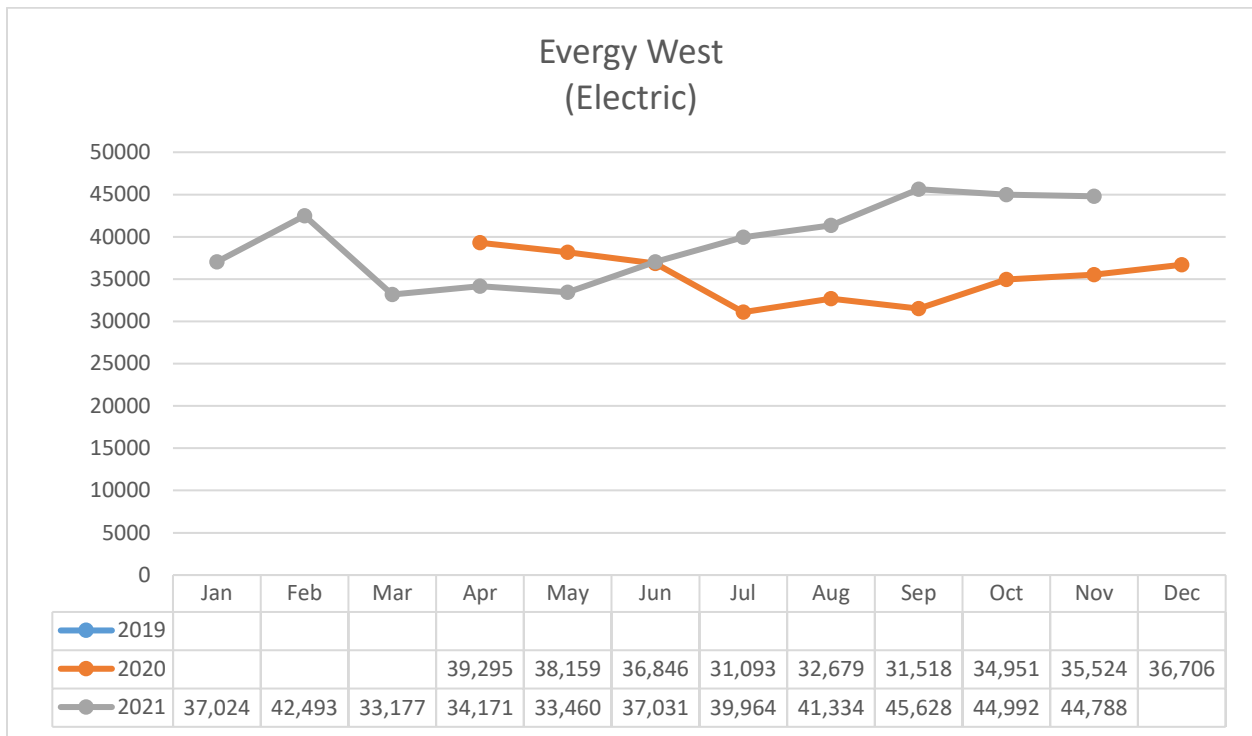
Questions 1 & 3 (Evergny West – Electric)

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



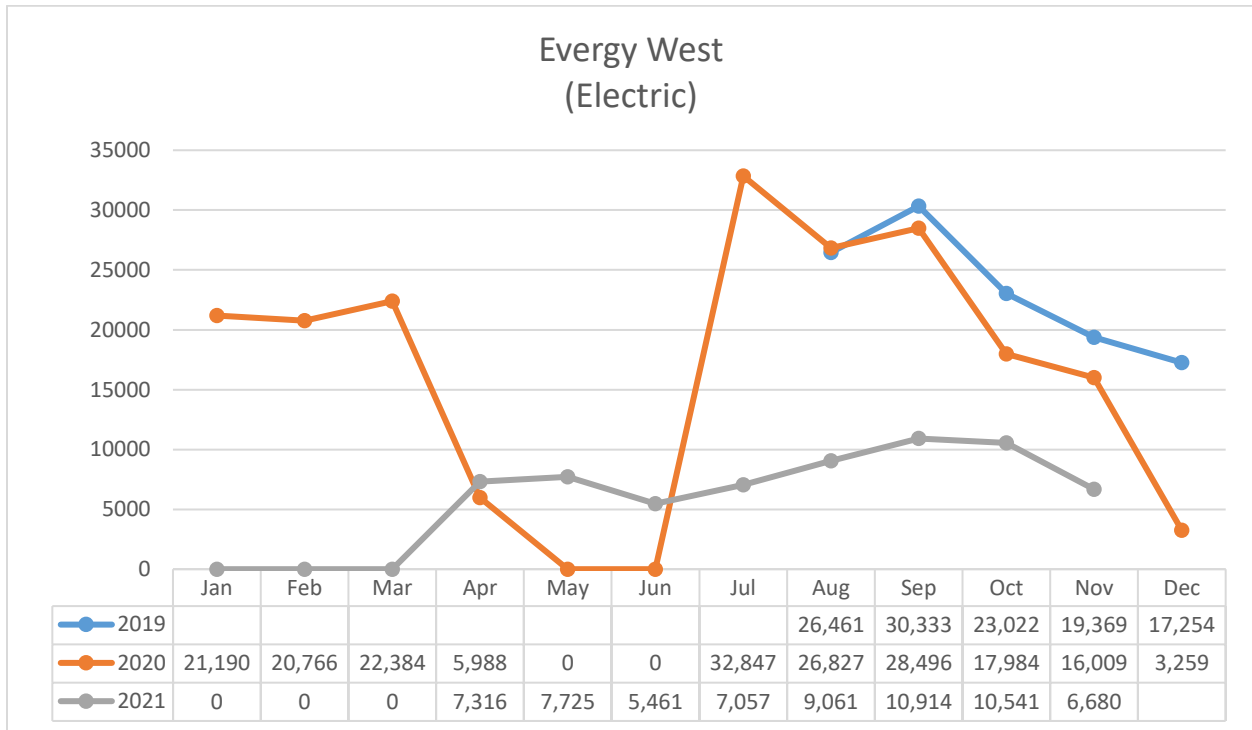
As shown in the previous graph, Evergny West performed 99% more disconnections for non-payment in November 2021 versus November 2020 and approximately 35% fewer in November 2021 than in October 2021. The number of actual disconnections by Evergny West in November 2021 was 199% more than the amount projected by Evergny West for the same month. The number of disconnections for non-payment of services in November 2021 was 67% more than pre-pandemic, October 2019.

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”



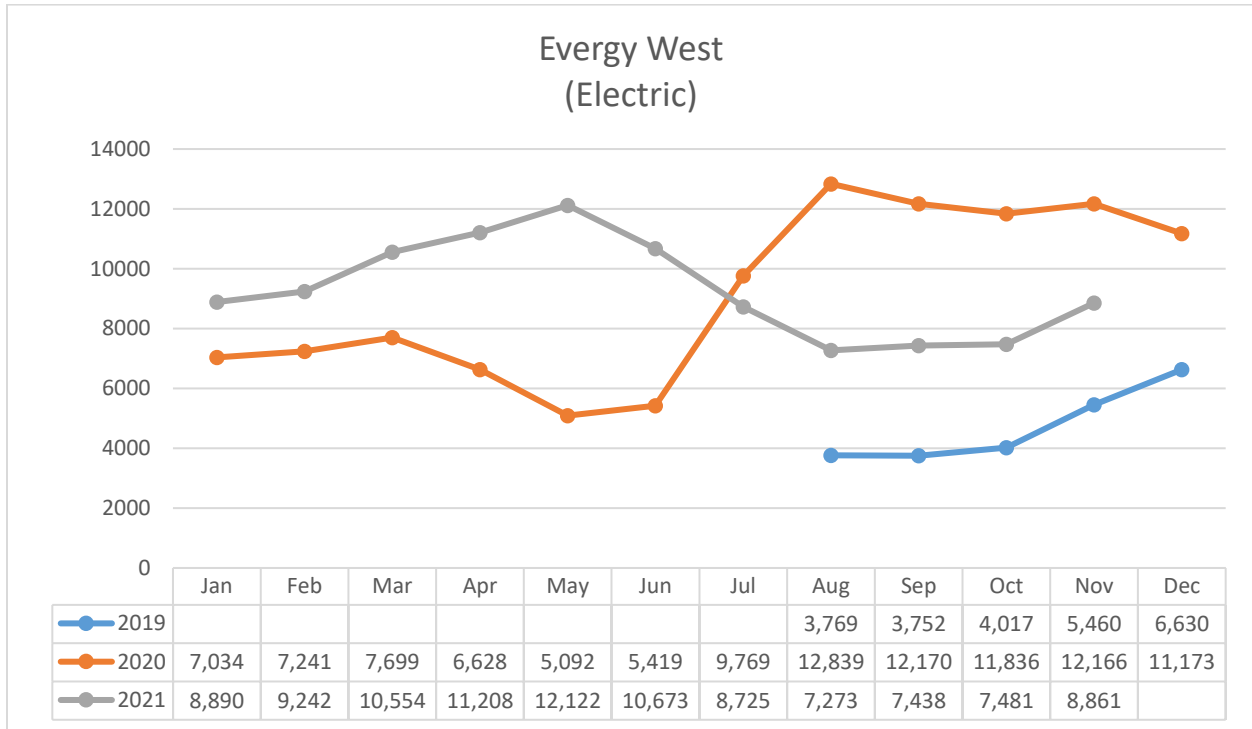
The previous data indicates that there were 26% more Evergy West customers with past-due accounts in November 2021 versus November 2020 and less than 1% less in November 2021 than in October 2021. Staff is unable to compare current past-due accounts to pre-pandemic past-due account numbers as Evergy West was unable to provide historical data from August 2019 – March 2020. Evergy West defines past-due accounts as accounts that are more than 30 days in arrears.

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



As shown by Evergy West’s data, for those customers who received a final disconnection notice, there were 58% fewer customers who were not disconnected in November 2021 versus November 2020 and approximately 37% fewer customers in November 2021 than in October 2021. There are 66% fewer customers who have received a final disconnection notice, but have not been disconnected for non-payment in November 2021 versus pre-pandemic, November 2019.

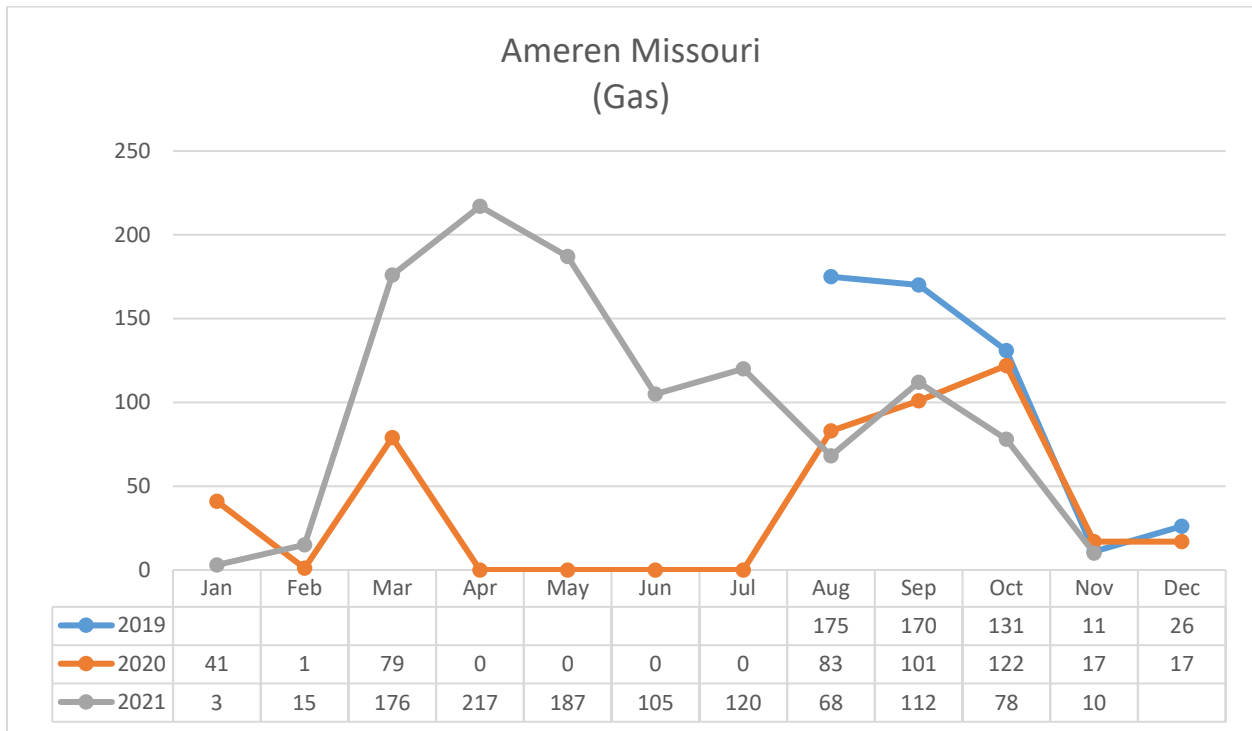
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 27% fewer Evergy West customers who participated in payment plans in November 2021 versus November 2020 and about 18% more in November 2021 than in October 2021. There were 62% more customers participating in payment plans at month-end in November 2021 versus pre-pandemic, November 2019.

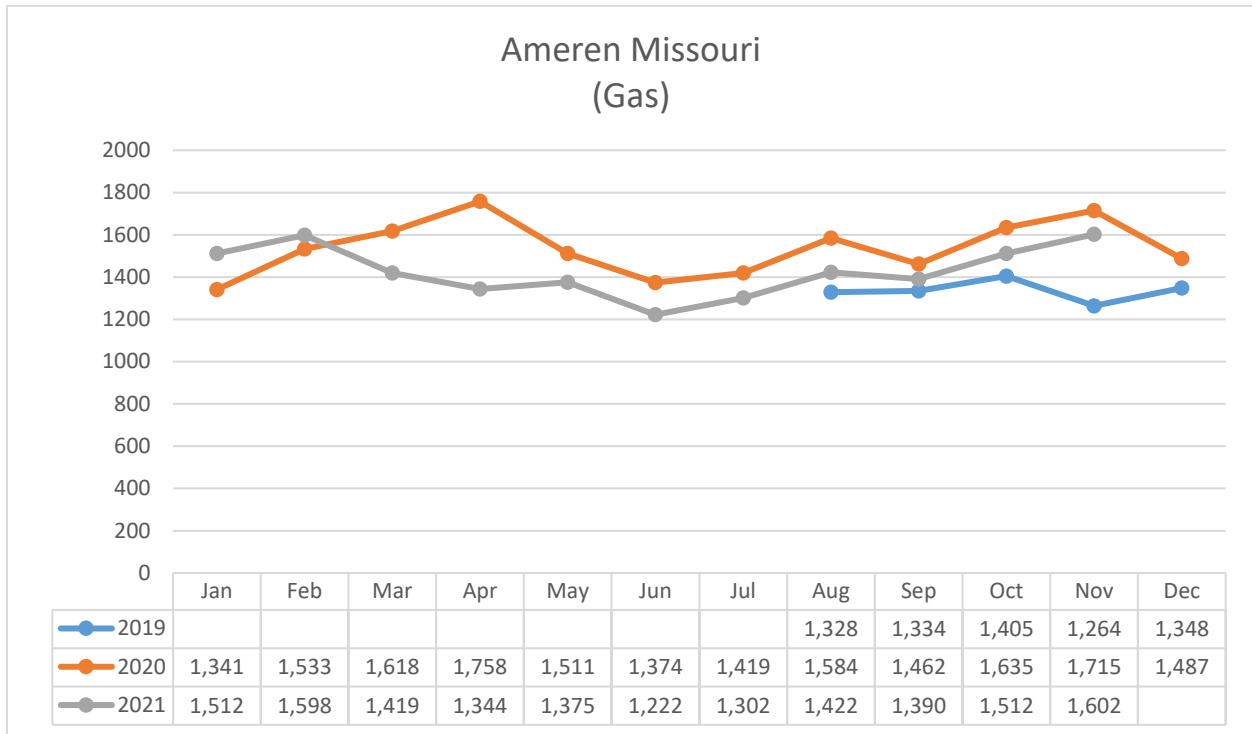
Questions 1 & 3 (Ameren Missouri – Gas)

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



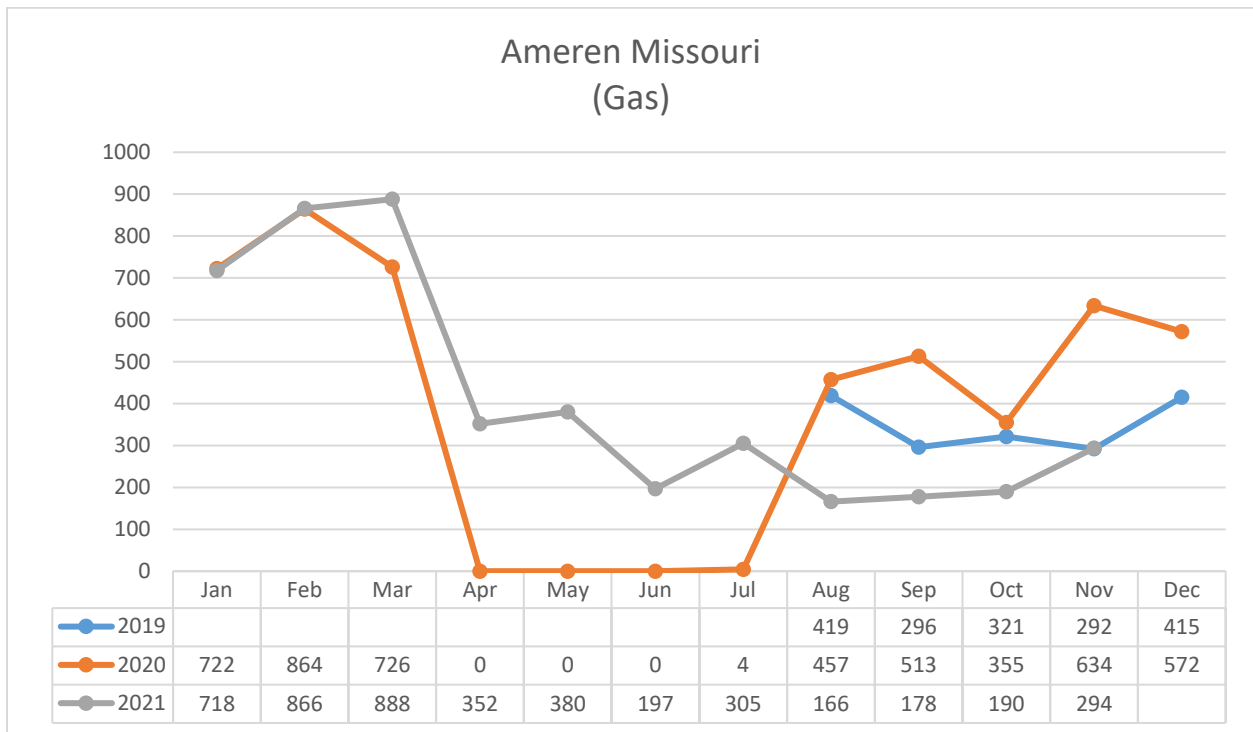
As shown in the previous graph, Ameren Missouri performed 41% fewer disconnections for non-payment in November 2021 versus November 2020 and about 87% fewer in November 2021 than in October 2021. The number of actual disconnections by Ameren Missouri in November 2021 was 71% below the amount projected by Ameren Missouri for the same month. There were approximately 9% fewer disconnections for non-payment services in November 2021 versus pre-pandemic, November 2019.

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”



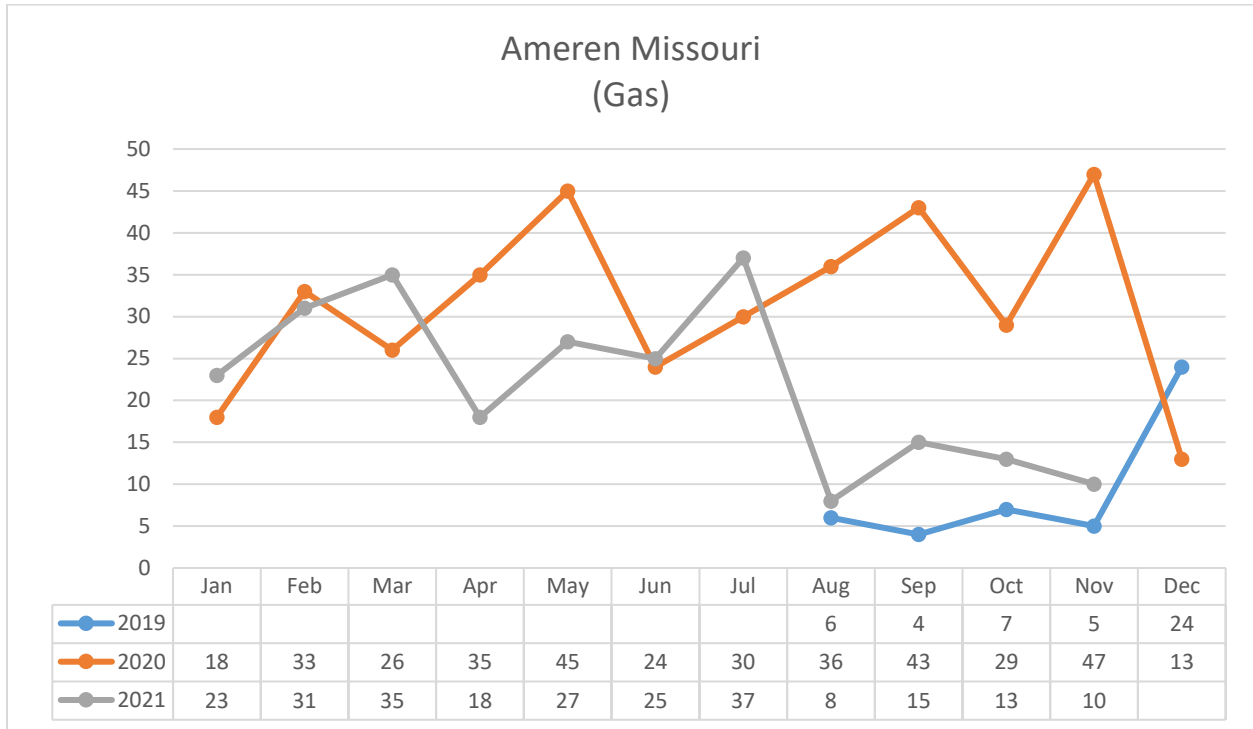
The previous data indicates that there were approximately 7% fewer Ameren Missouri customers with past-due accounts in November 2021 versus November 2020 and approximately 6% more in November 2021 than in October 2021. There were about 27% more customers with past-due accounts in November 2021 versus pre-pandemic, November 2019. 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 54% fewer customers who were not disconnected in November 2021 versus in November 2020 and approximately 55% more in November 2021 than in October 2021. There were 2 more customers who received a final disconnection notice, but have not been disconnected for non-payment in November 2021 versus pre-pandemic, November 2019.

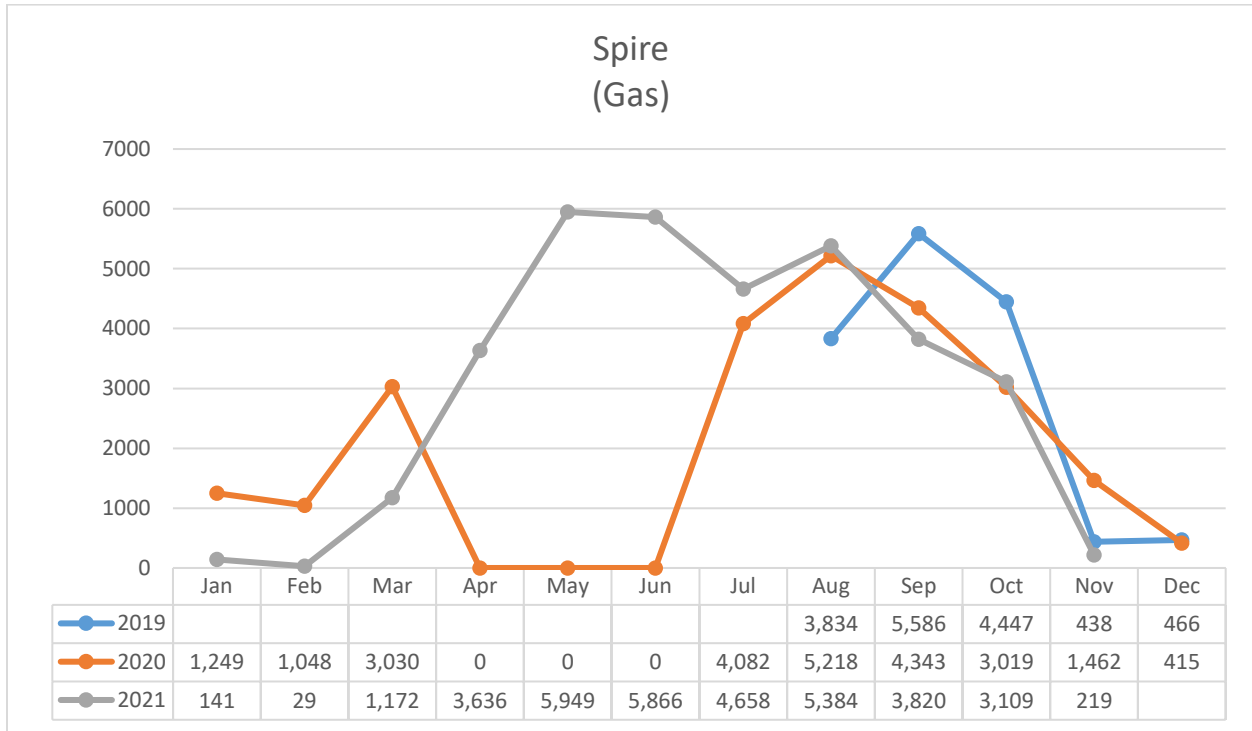
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 79% fewer Ameren Missouri customers who participated in payment plans in November 2021 versus November 2020 and 3 less customers participating in November 2021 than in October 2021. There were 5 more customers participating in payment plans in November 2021 versus in pre-pandemic, November 2019.

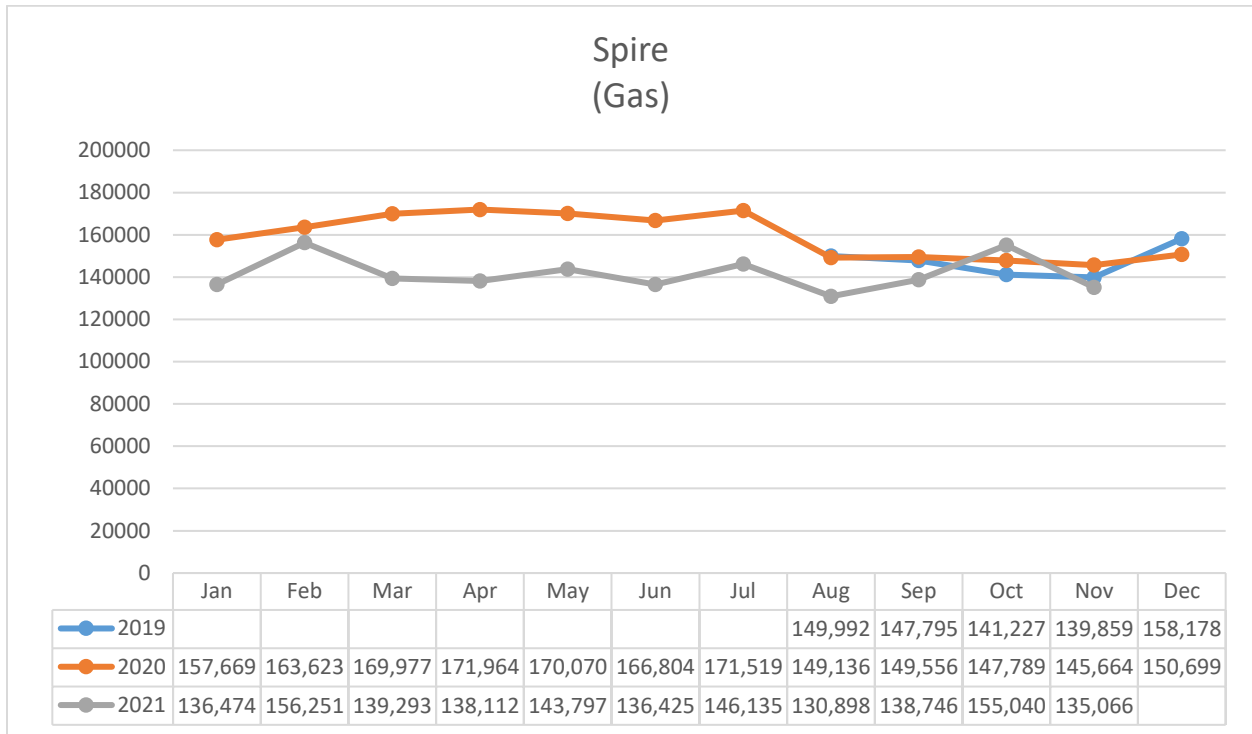
Questions 1 & 3 (Spire - Gas)

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



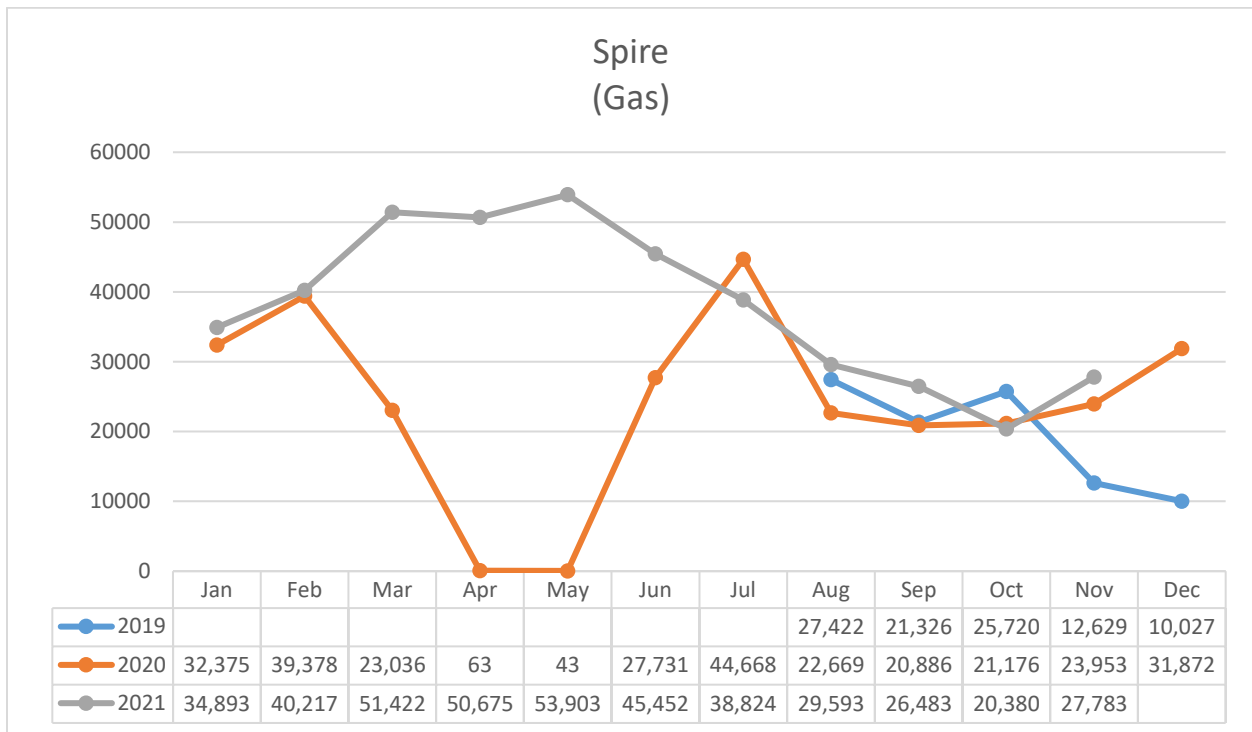
As shown in the previous graph, Spire performed approximately 85% fewer disconnections for non-payment in November 2021 versus November 2020 and approximately 93% fewer in November 2021 than in October 2021. The number of actual disconnections by Spire in November 2021 was about 80% lower than the amount projected by Spire for the same month. There were 50% fewer disconnections for non-payment in November 2021 versus pre-pandemic, November 2019.

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”



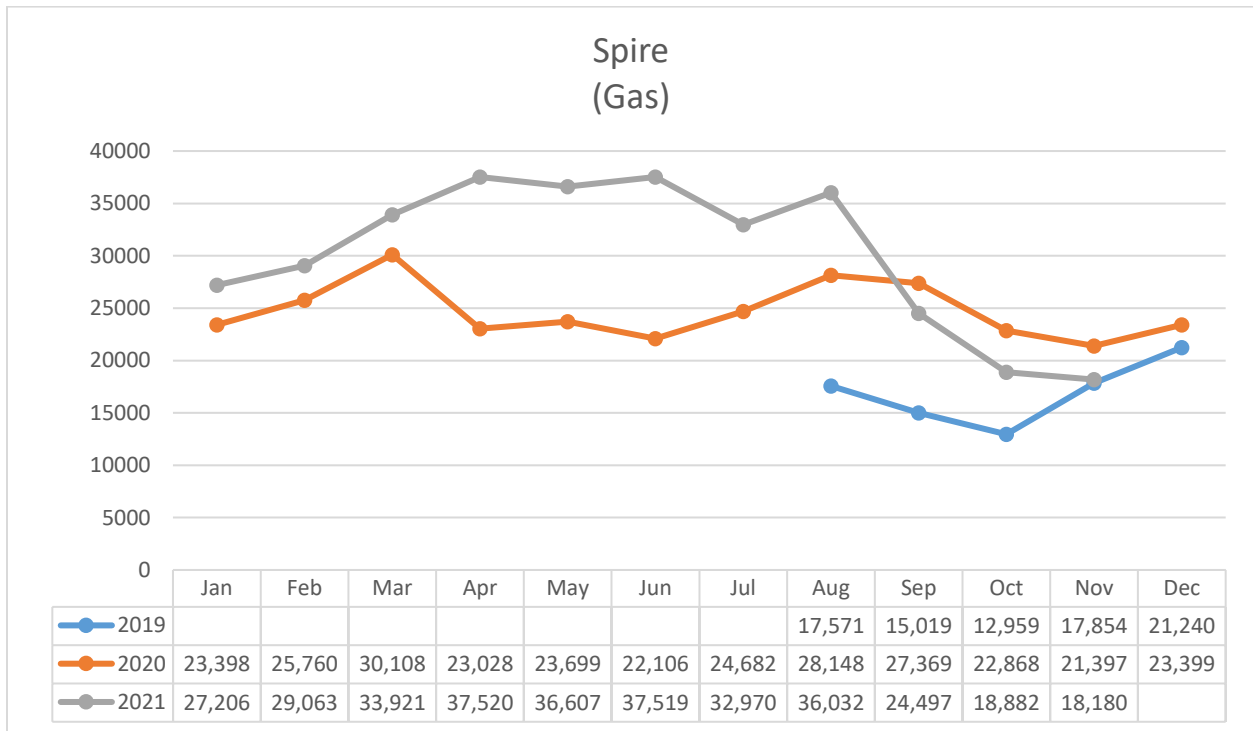
The previous data indicates that there were about 7% fewer Spire customers with past-due accounts in November 2021 versus November 2020 and approximately 13% fewer in November 2021 than in October 2021. There were about 3% less customers with past-due accounts in November 2021 versus pre-pandemic, November 2019. Spire reported that past-due accounts are defined as accounts with arrear amounts owed for over 30 days that were not final billed at month’s end.

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



As shown by Spire’s data, for those customers who received a final disconnection notice there were about 16% more customers who were not disconnected in November 2021 versus in November 2020 and approximately 36% more in November 2021 than in October 2021. There were 120% more customers who have received a final disconnection notice, but have not been disconnected for non-payment of services in November 2021 versus pre-pandemic, November 2019.

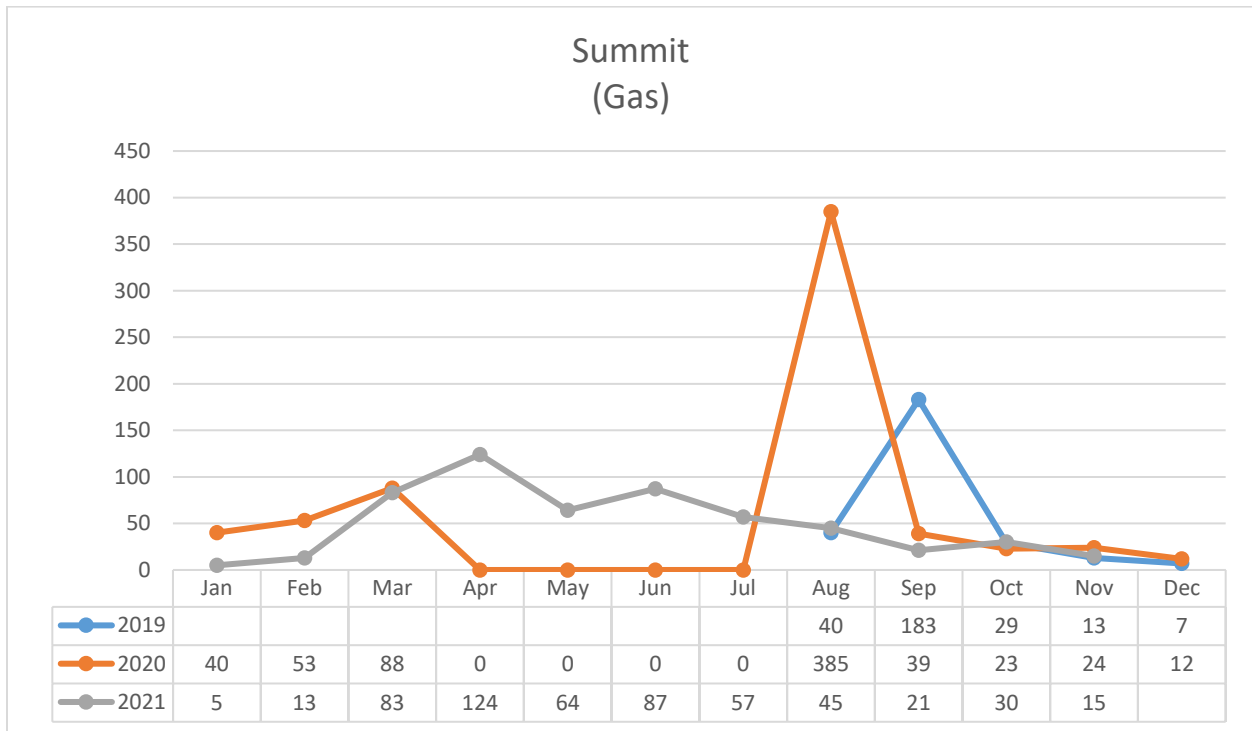
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 15% fewer Spire customers who participated in payment plans in November 2021 versus November 2020 and about 4% fewer in November 2021 than in October 2021. There were 2% more customers participating in payments plans in November 2021 versus pre-pandemic, November 2019.

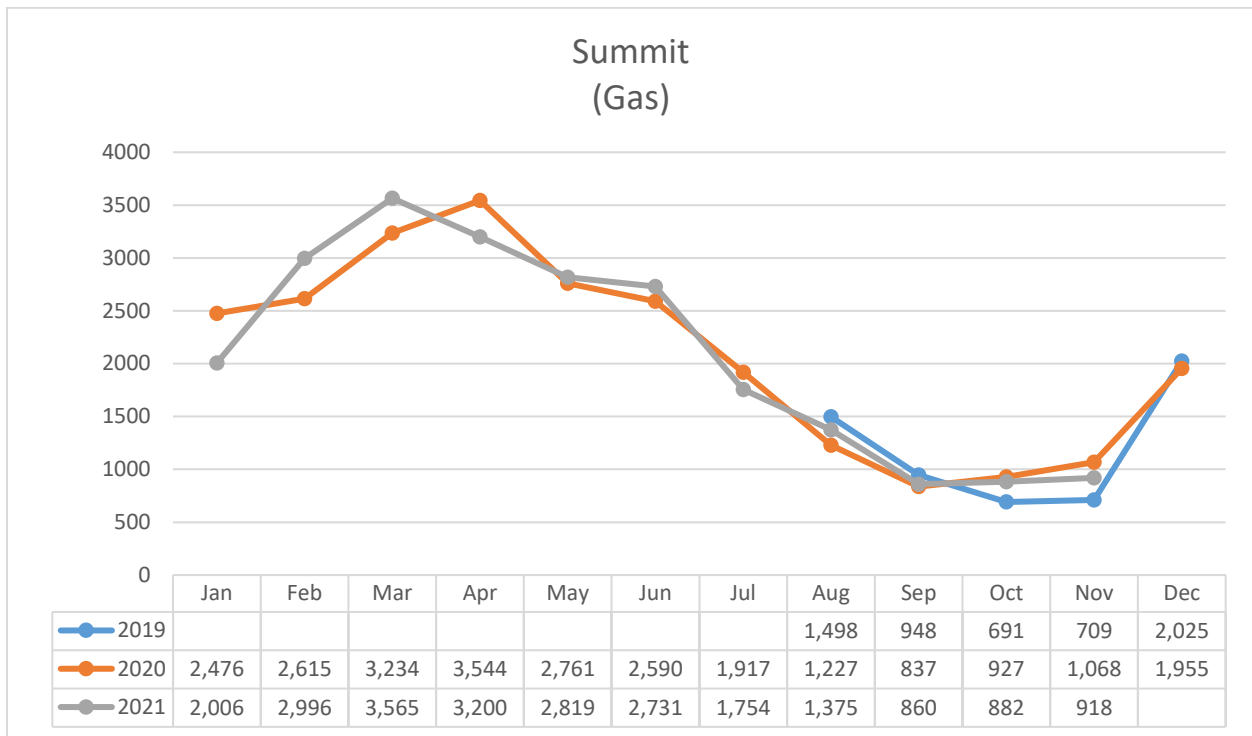
Questions 1 & 3 (Summit - Gas)

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



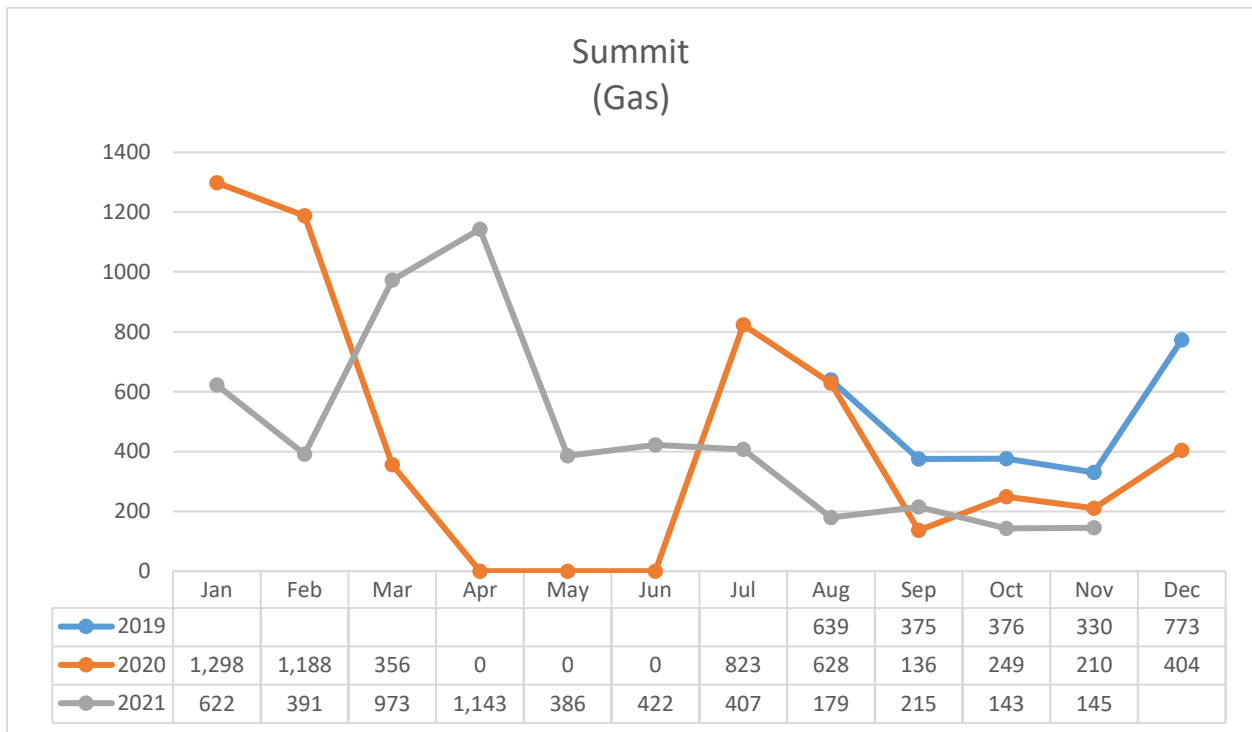
As shown in the previous graph, Summit performed 38% less disconnections for non-payment in November 2021 versus November 2020 and about 50% less in November 2021 than in October 2021. The number of actual disconnections by Summit in November 2021 was 2 customers below the amount projected by Summit for the same month. There was 2 more disconnections for non-payment of services in November 2021 versus pre-pandemic, November 2019.

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”



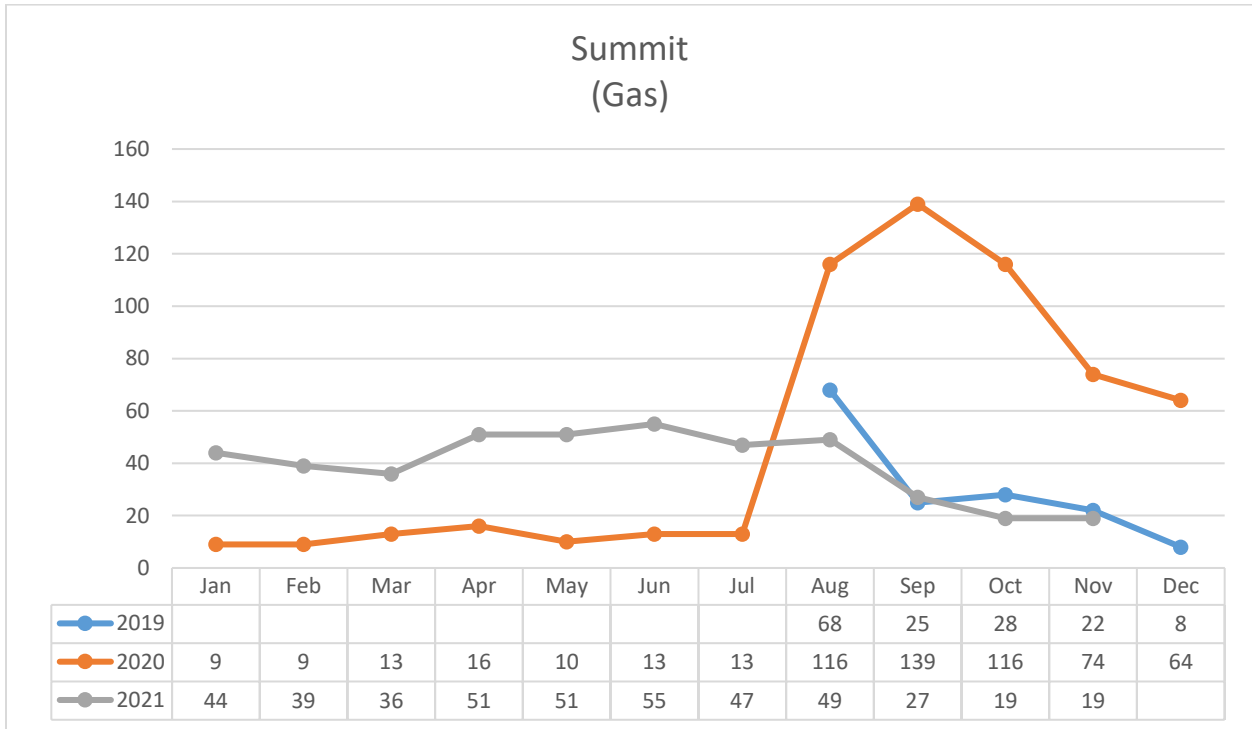
The previous data indicates that there were about 14% fewer Summit customers with past-due accounts in November 2021 versus November 2020 and approximately 4% more in November 2021 than in October 2021. There were approximately 29% more customers with past-due accounts as of month-end in November 2021 versus pre-pandemic, November 2019. 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 31% fewer customers who were not disconnected in November 2021 versus November 2020 and approximately 1% more in November 2021 than in October 2021. There were 56% fewer customers who have received a final disconnection notice, but have not been disconnected for non-payment of services in November 2021 versus pre-pandemic, November 2019.

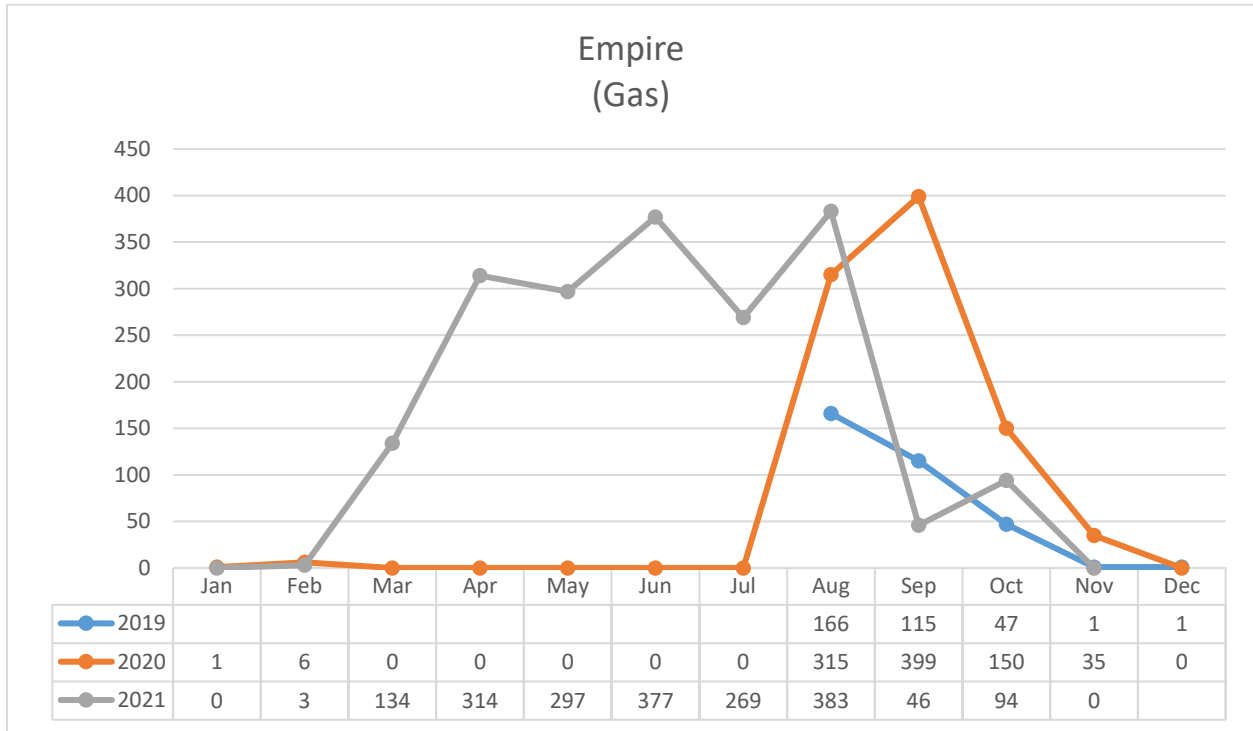
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 74% fewer Summit customers who participated in payment plans in November 2021 versus November 2020 and the same amount of customers who participated in payment plans in November 2021 than in October 2021. There were 14% fewer customers participating in payment plans in November 2021 versus pre-pandemic, November 2019.

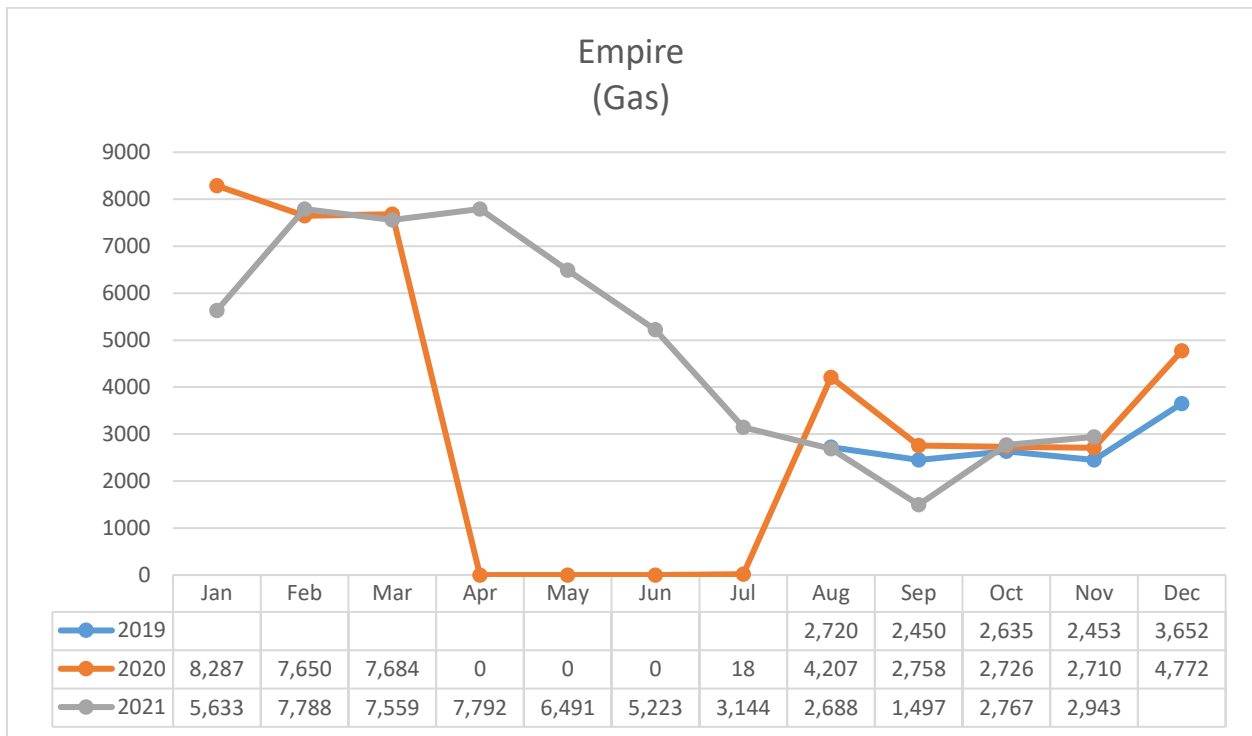
Questions 1 & 3 (Empire - Gas)

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



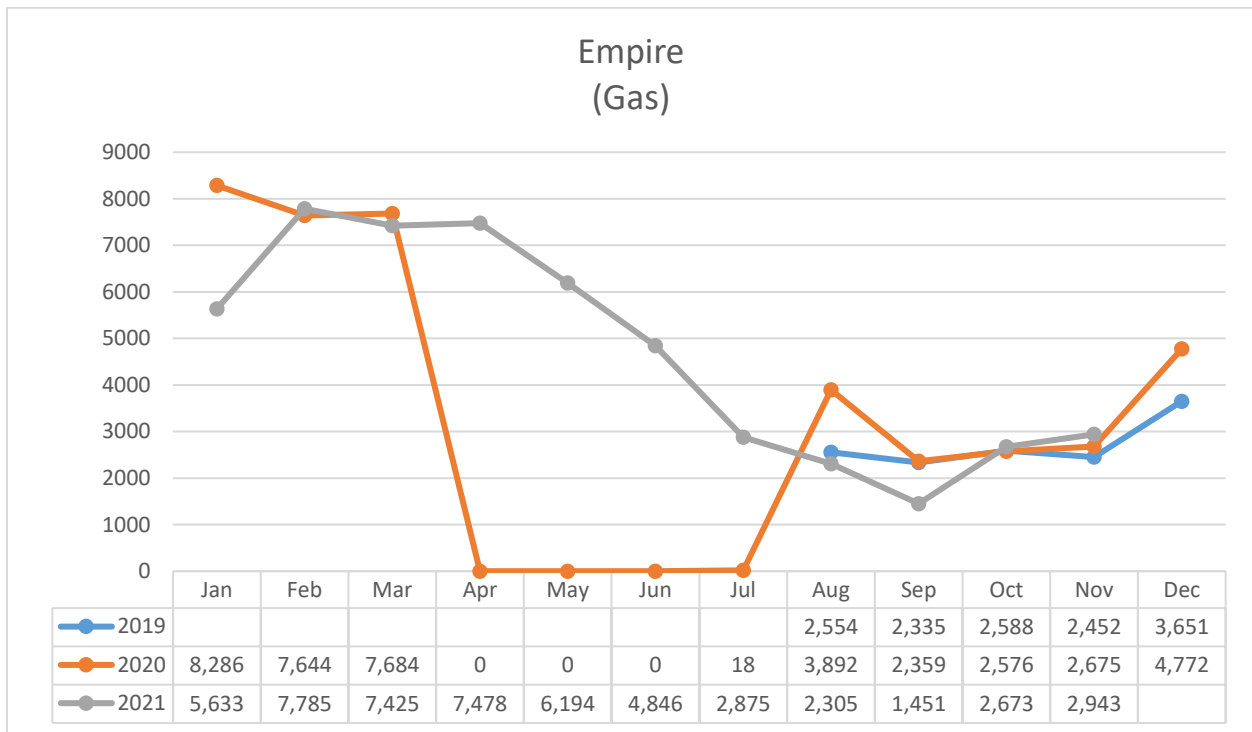
As shown in the previous graph, Empire performed 0 disconnections for non-payment in November 2021 versus 35 in November 2020 and about 0 in November 2021 versus 94 in October 2021. The number of actual disconnections by Empire in November 2021 was 0 and below the 35 disconnections projected by Empire for the same month. There were 0 disconnections for non-payment of services in November 2021 versus 1 pre-pandemic, November 2019.

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”



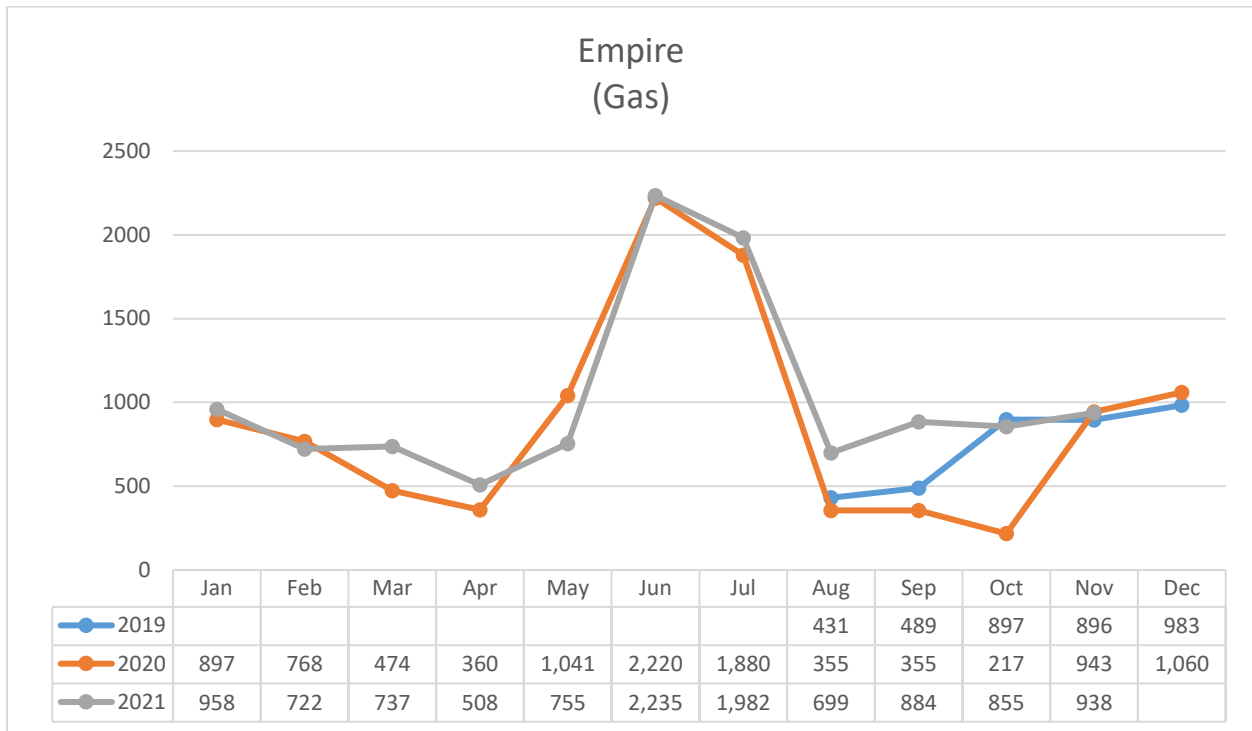
The previous data indicates that there were approximately 9% more Empire customers with past-due accounts in November 2021 versus November 2020 and approximately 6% more in November 2021 than in October 2021. There were 20% more customers with past-due accounts in November 2021 versus pre-pandemic, November 2019. 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 10% more customers who were not disconnected in November 2021 versus November 2020 and approximately 10% more in November 2021 than in October 2021. There were 20% more customers who have received a final disconnection notice, but have not been disconnected in November 2021 versus pre-pandemic, November 2019.

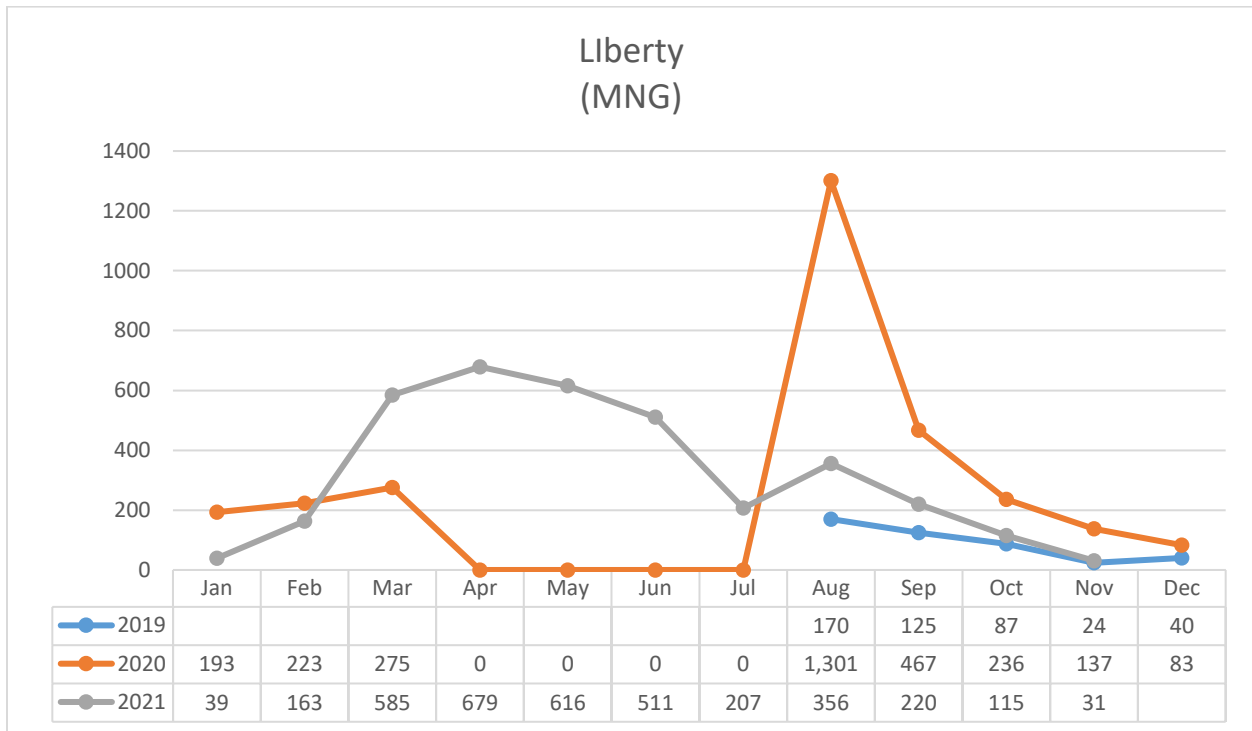
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were 5 fewer Empire customers who participated in payment plans in November 2021 versus November 2020 and about 10% more in November 2021 than in October 2021. There were about 5% more customers participating in payment plans in November 2021 versus pre-pandemic, November 2019.

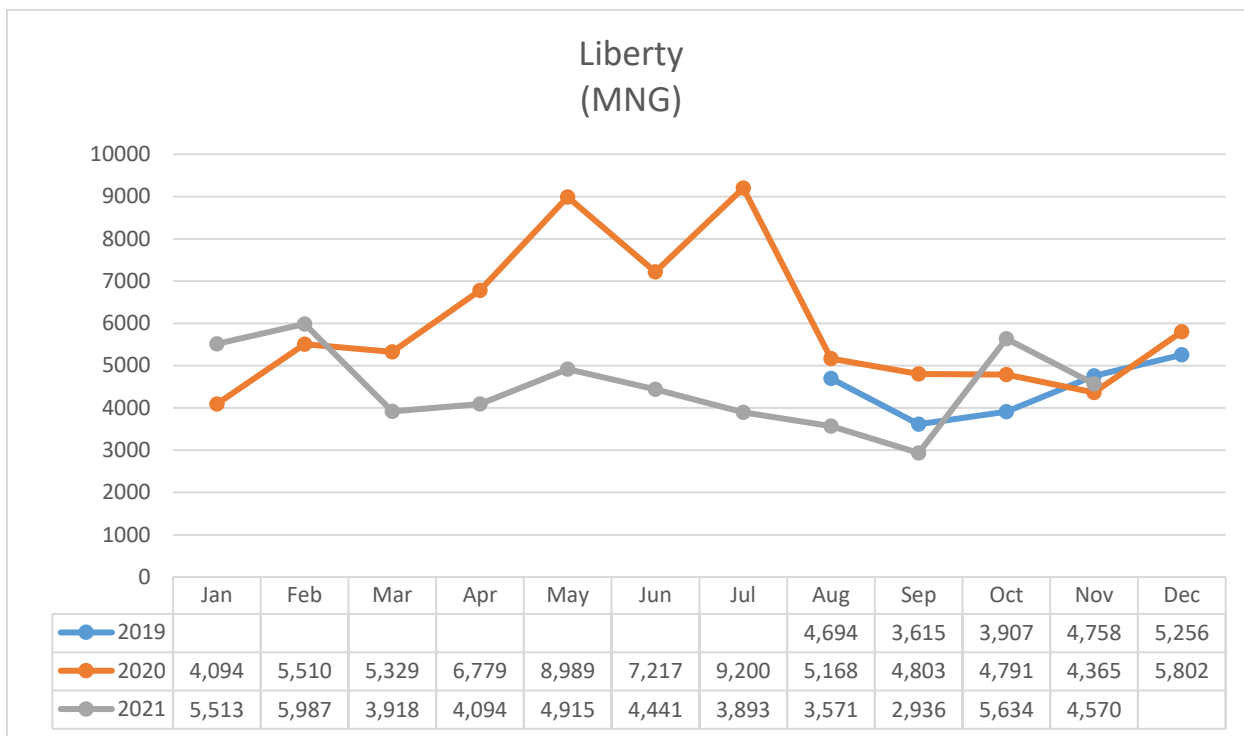
Questions 1 & 3 (Liberty (MNG) - Gas)

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



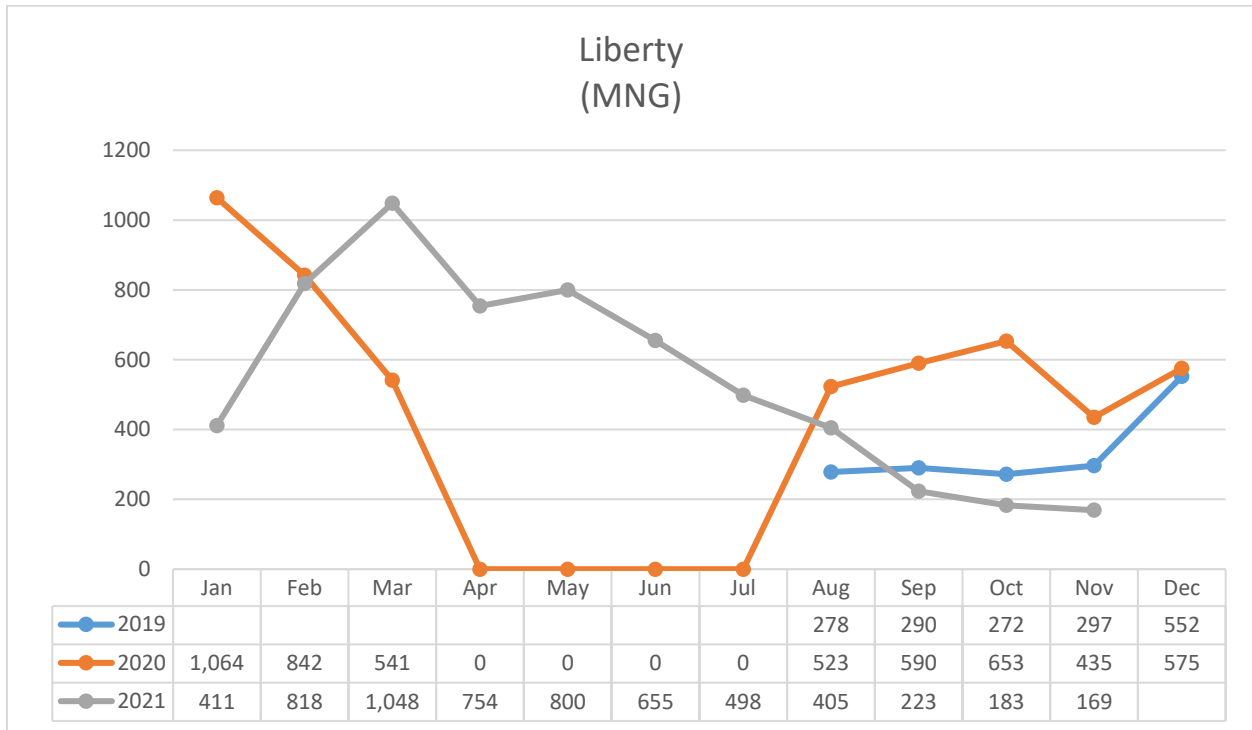
As shown in the previous graph, Liberty (MNG) performed 77% fewer disconnections for non-payment in November 2021 versus November 2020 and about 73% fewer in November 2021 than in October 2021. The number of actual disconnections by Liberty (MNG) in November 2021 was 79% fewer than the amount projected by Liberty (MNG) for the same month. There were approximately 29% more disconnections for non-payment in November 2021 versus pre-pandemic, November 2019.

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”



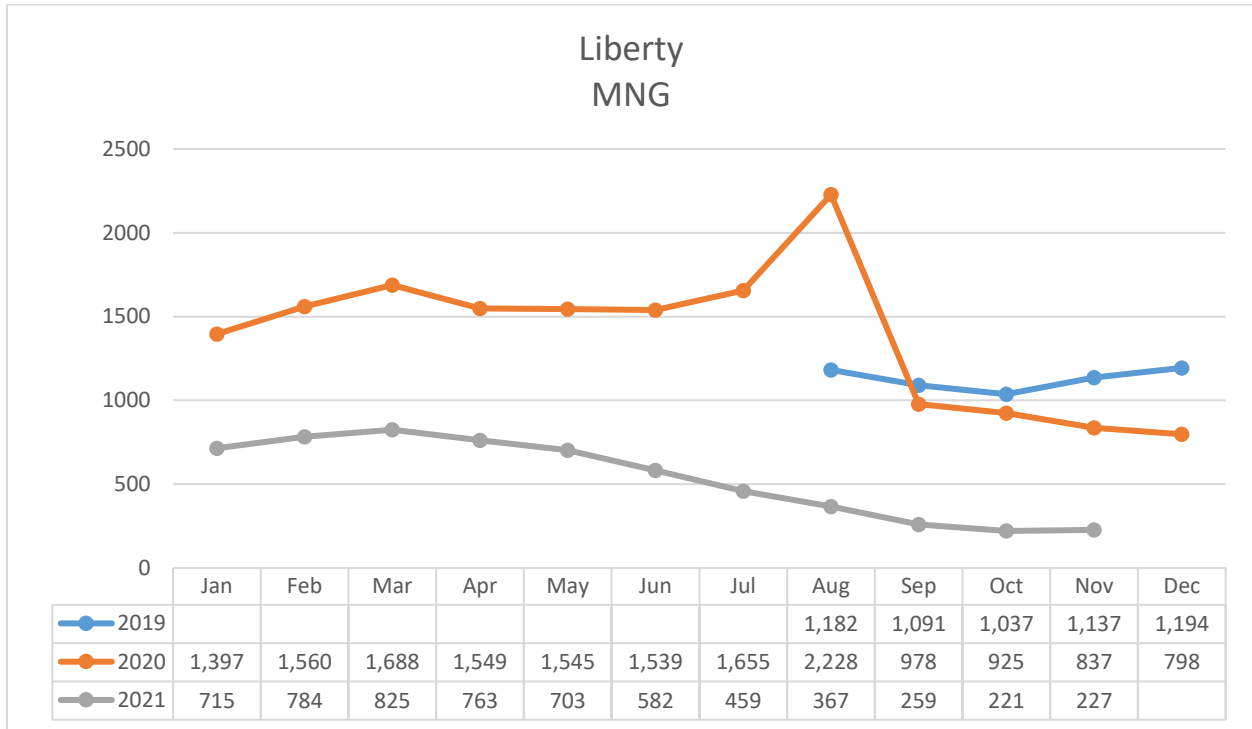
The previous data indicates that there were approximately 5% more Liberty (MNG) customers with past-due accounts in November 2021 versus November 2020 and approximately 19% fewer in November 2021 than in October 2021. There were approximately 4% fewer customers with past-due accounts in November 2021 versus pre-pandemic, November 2019. 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 61% fewer customers who were not disconnected in November 2021 versus November 2020 and approximately 8% fewer in November 2021 than in October 2021. There were 43% fewer customers who received a final disconnection notice but were not disconnected in November 2021 versus pre-pandemic, November 2019.

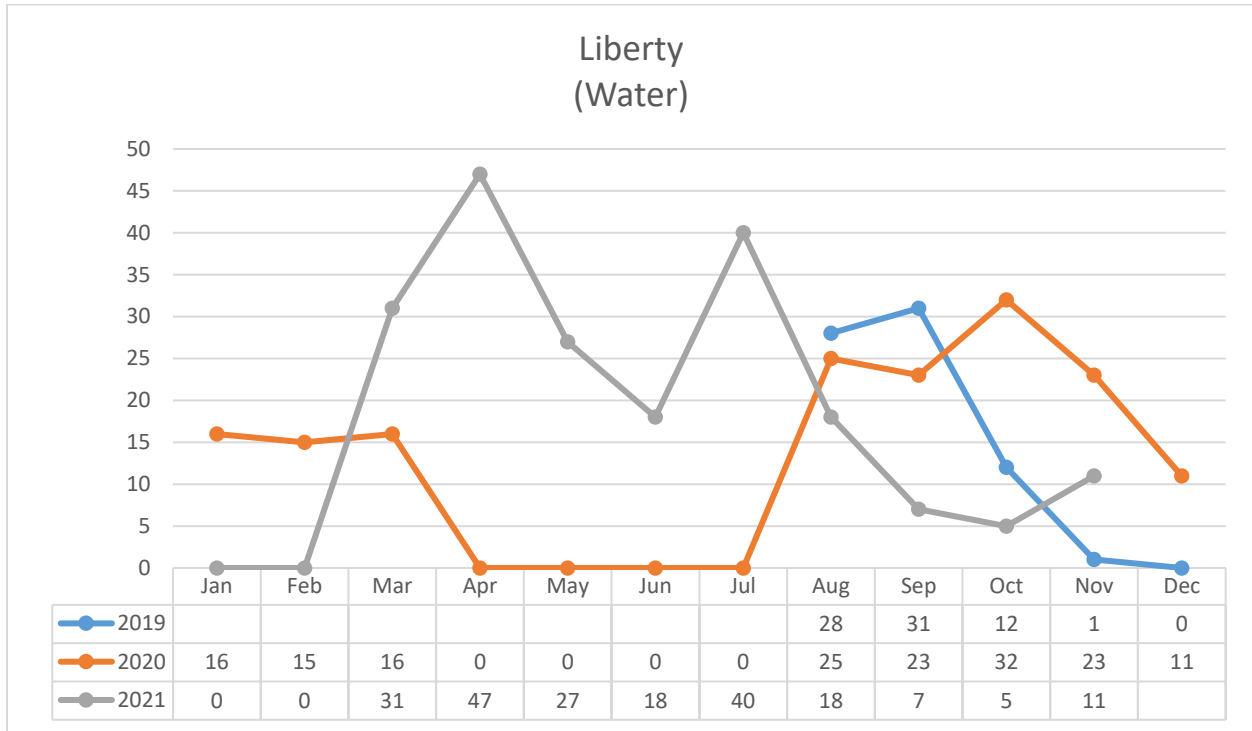
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 73% fewer Liberty (MNG) customers who participated in payment plans in November 2021 versus November 2020 and 6 more customers in November 2021 than in October 2021. There were 80% fewer customers participating in payment plans in November 2021 versus pre-pandemic, November 2019.

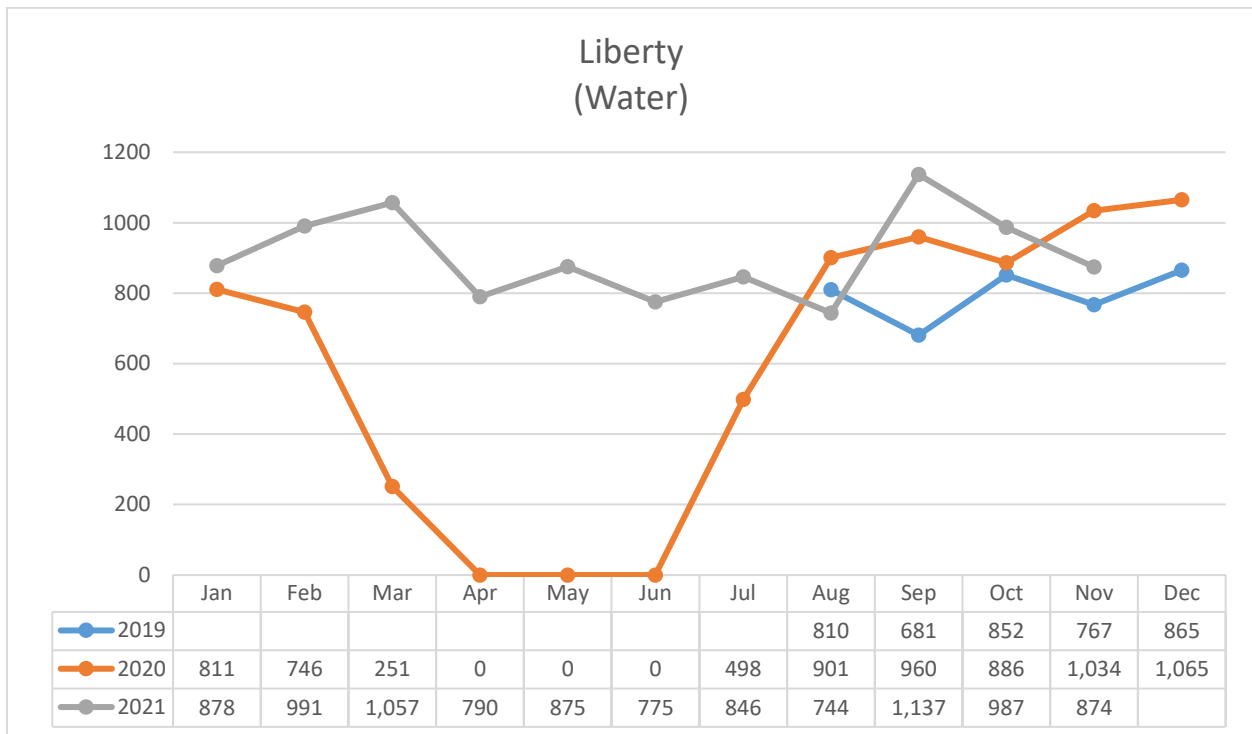
Questions 1 & 3 (Liberty - Water)

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



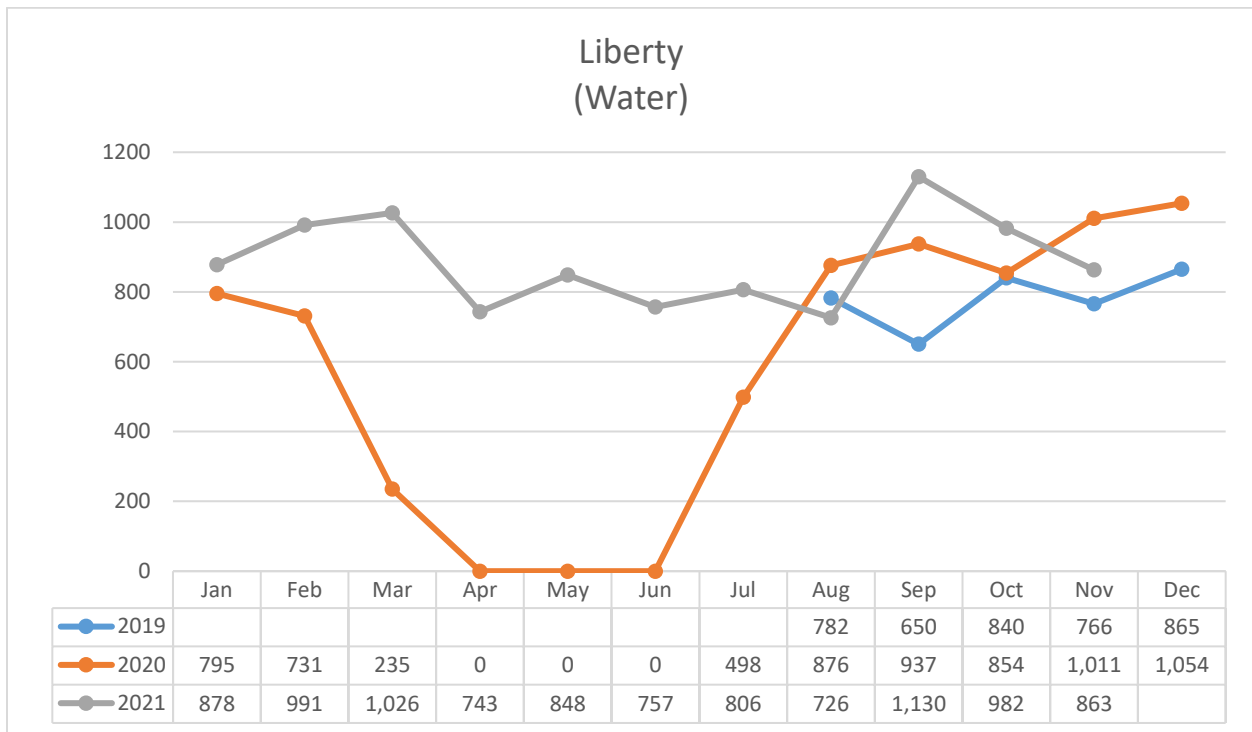
As shown in the previous graph, Liberty performed approximately 52% fewer disconnections for non-payment in November 2021 versus November 2020 and 6 more in November 2021 than in October 2021. The number of actual disconnections by Liberty in November 2021 was about 56% below the amount projected by Liberty for the same month. There were 10 more disconnections for non-payment in November 2021 versus pre-pandemic, November 2019.

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”



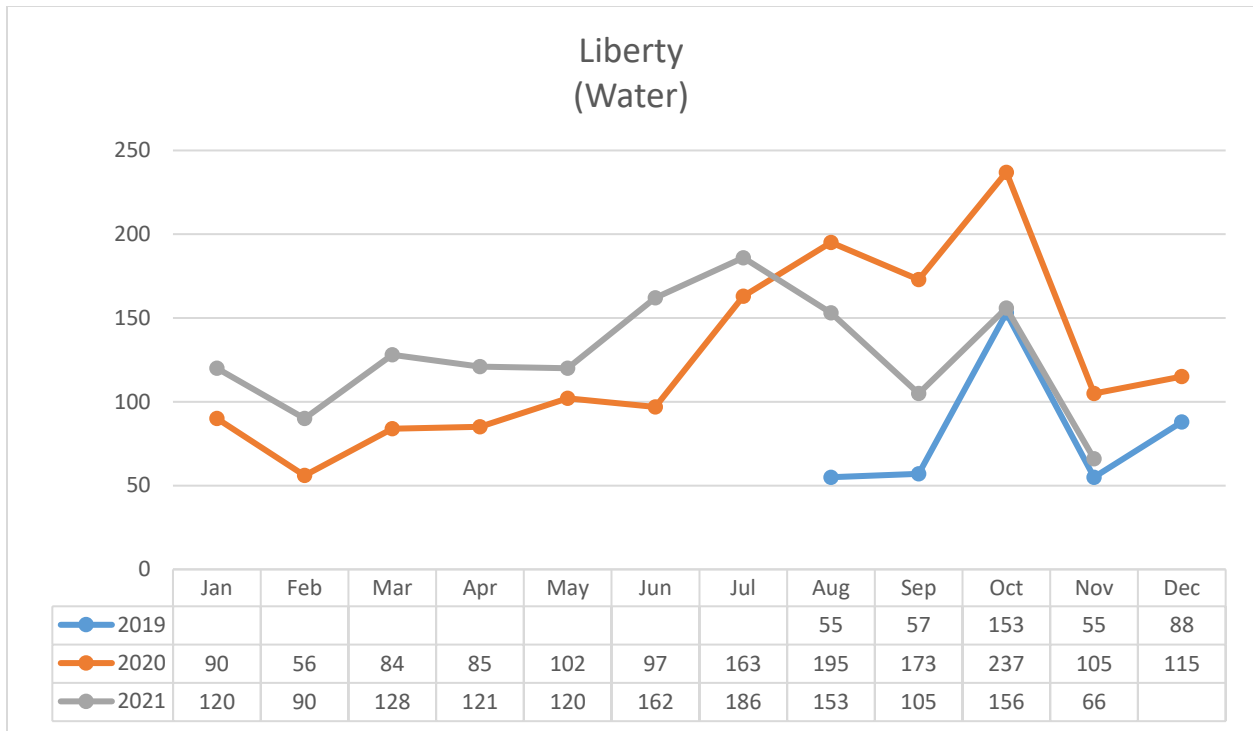
The previous data indicates that there were 15% fewer Liberty customers with past-due accounts in November 2021 versus November 2020 and approximately 11% fewer in November 2021 than in October 2021. There were about 14% more customers with past-due accounts in November 2021 versus pre-pandemic, November 2019. 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 15% fewer customers who were not disconnected in November 2021 versus November 2020 and approximately 12% fewer in November 2021 than in October 2021. There were 13% more customers who received a final disconnection notice, but have not been disconnected for non-payment in November 2021 versus pre-pandemic, November 2019.

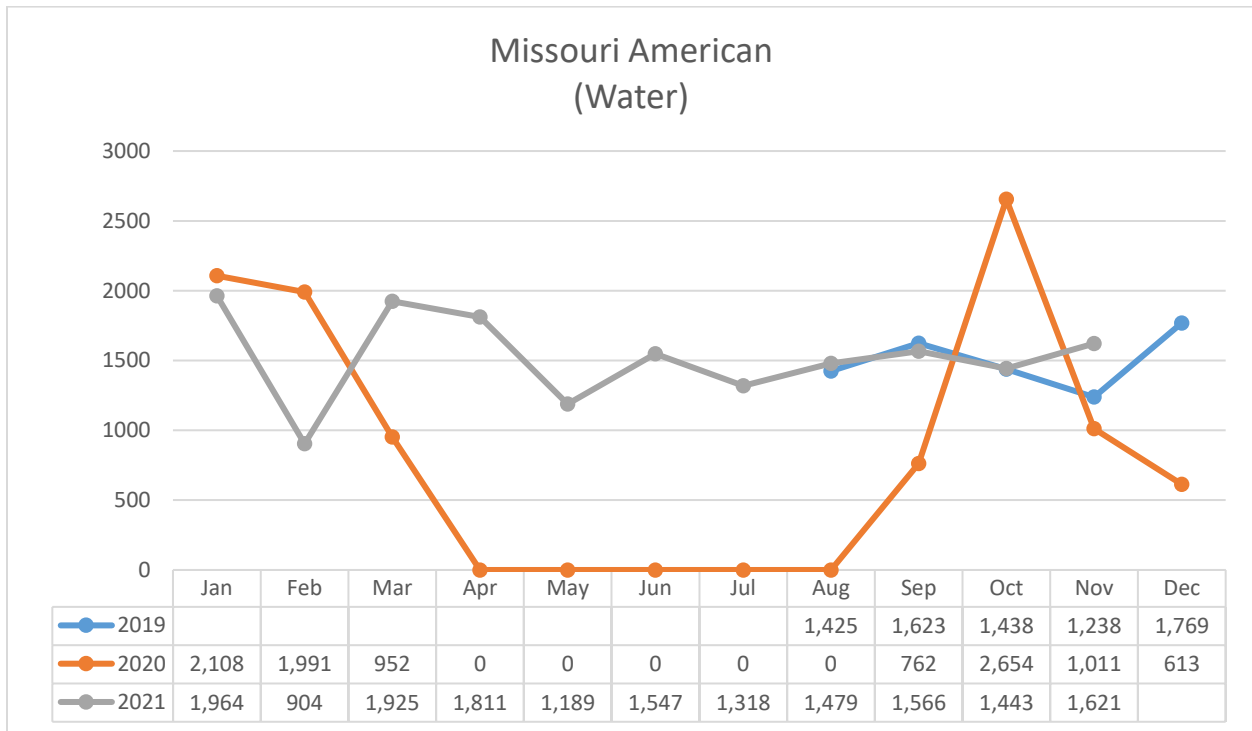
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 37% fewer Liberty customers who participated in payment plans in November 2021 versus November 2020 and about 58% fewer in November 2021 than in October 2021. There were 11 more customers participating in payment plans in November 2021 versus pre-pandemic, November 2019.

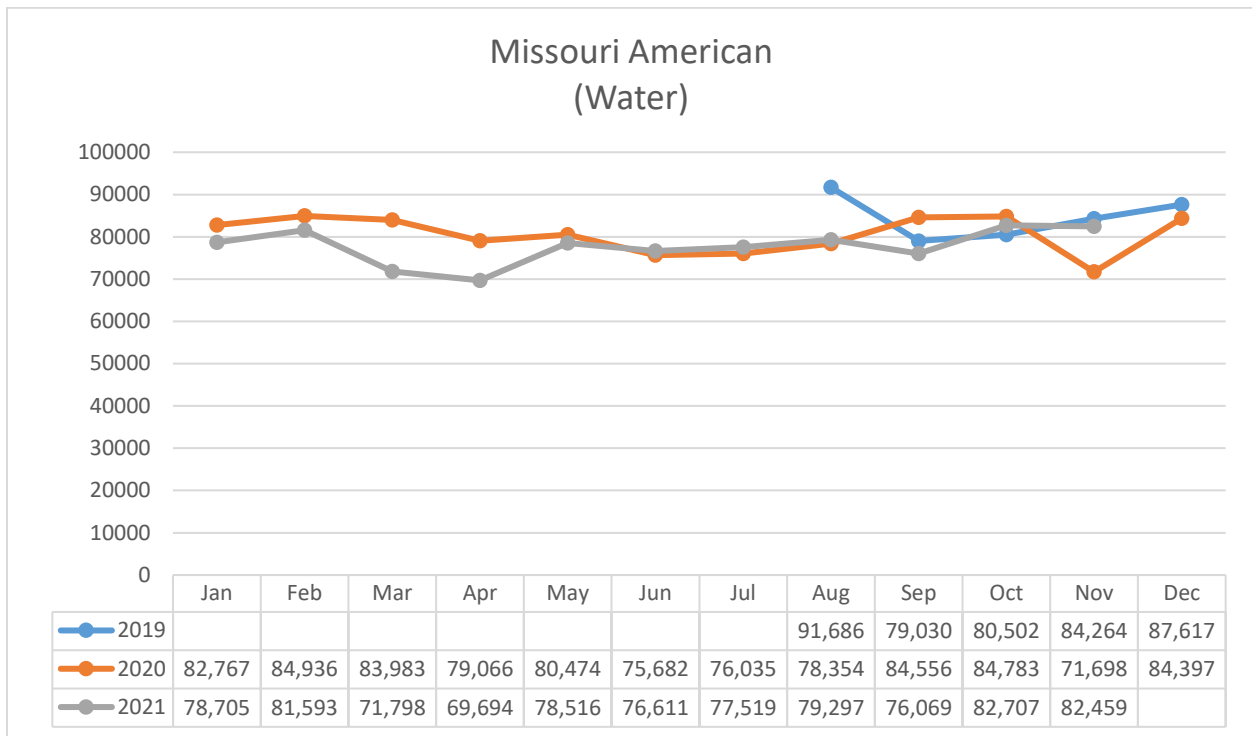
Questions 1 & 3 (Missouri-American - Water)

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



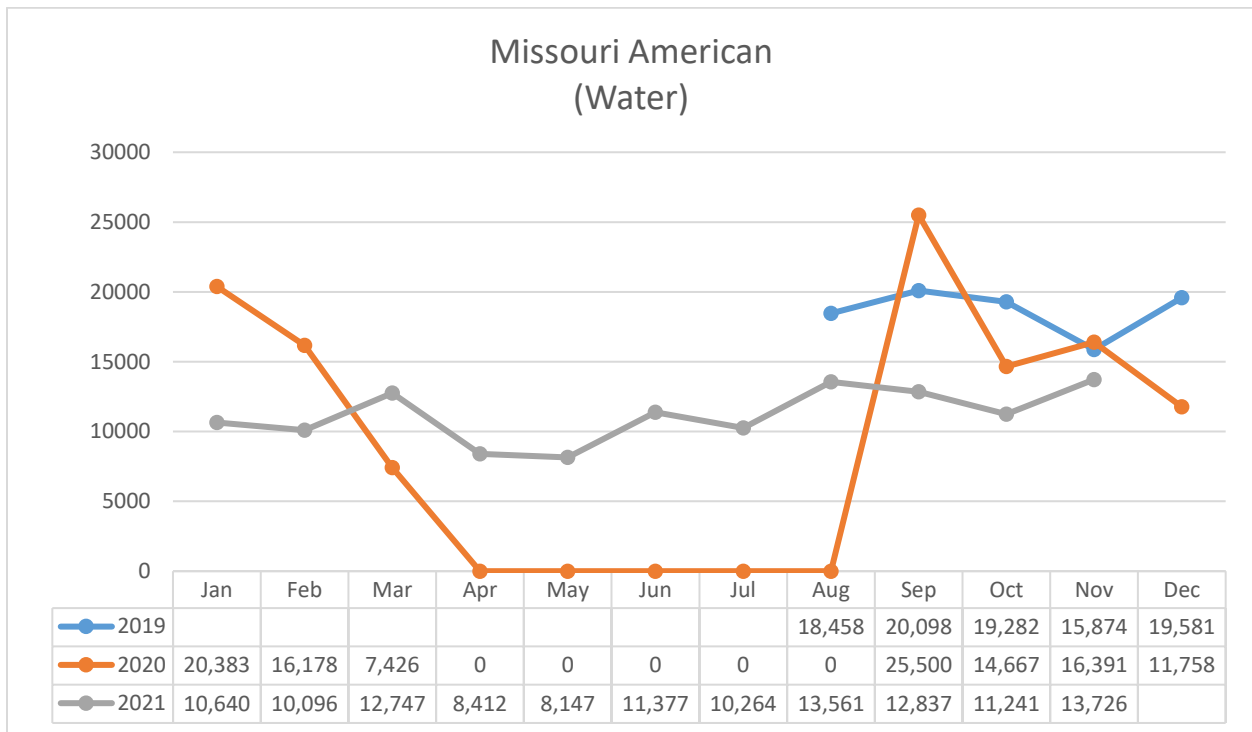
As shown in the previous graph, Missouri-American performed about 60% more disconnections for non-payment in November 2021 versus November 2020 and about 12% more in November 2021 than in October 2021. Missouri-American does not forecast the number of disconnections for non-payment. There were less than 31% more disconnections for non-payment in November 2021 versus pre-pandemic, November 2019.

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



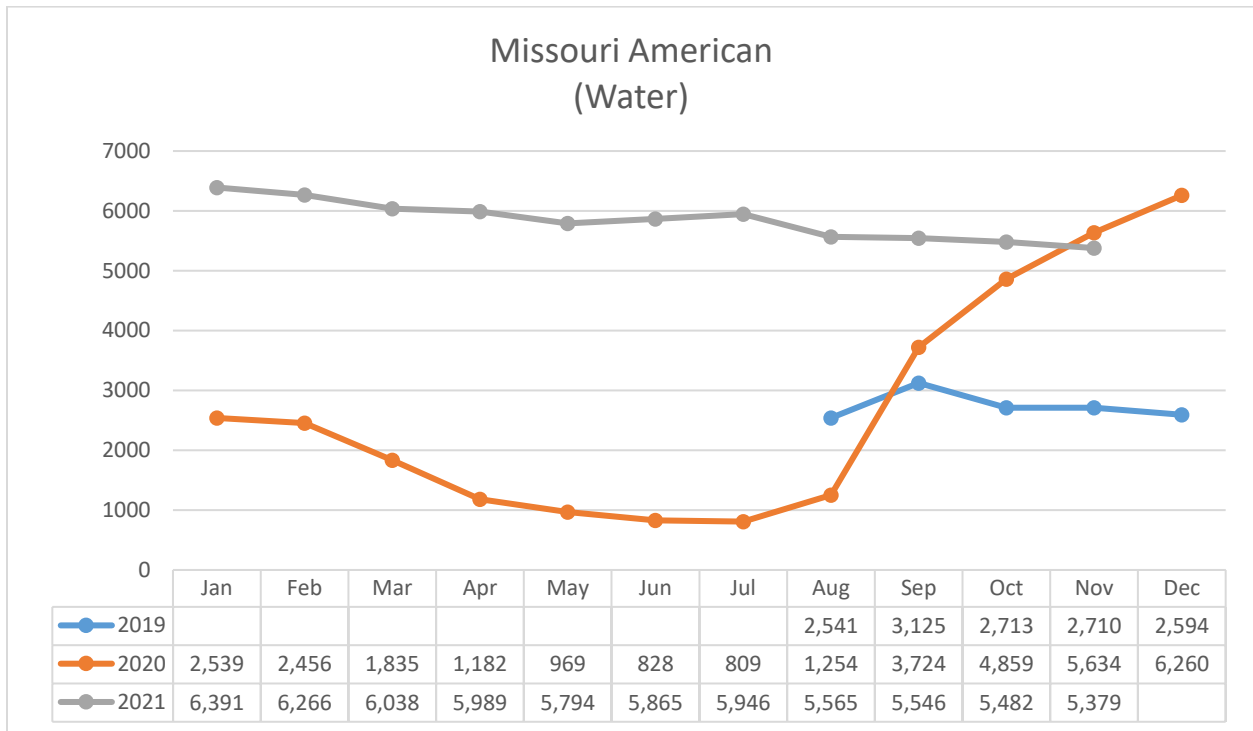
The previous data indicates that there were about 15% more Missouri-American customers with past-due accounts in November 2021 versus November 2020 and less than 1% fewer in November 2021 than in October 2021. There were 2% fewer customers with past-due accounts in November 2021 versus pre-pandemic, November 2019. 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 16% fewer customers who were not disconnected in November 2021 versus November 2020 and approximately 22% more in November 2021 than in October 2021. There were 14% fewer customers who received a final disconnection notice, but have not been disconnected in November 2021 versus pre-pandemic, November 2019.

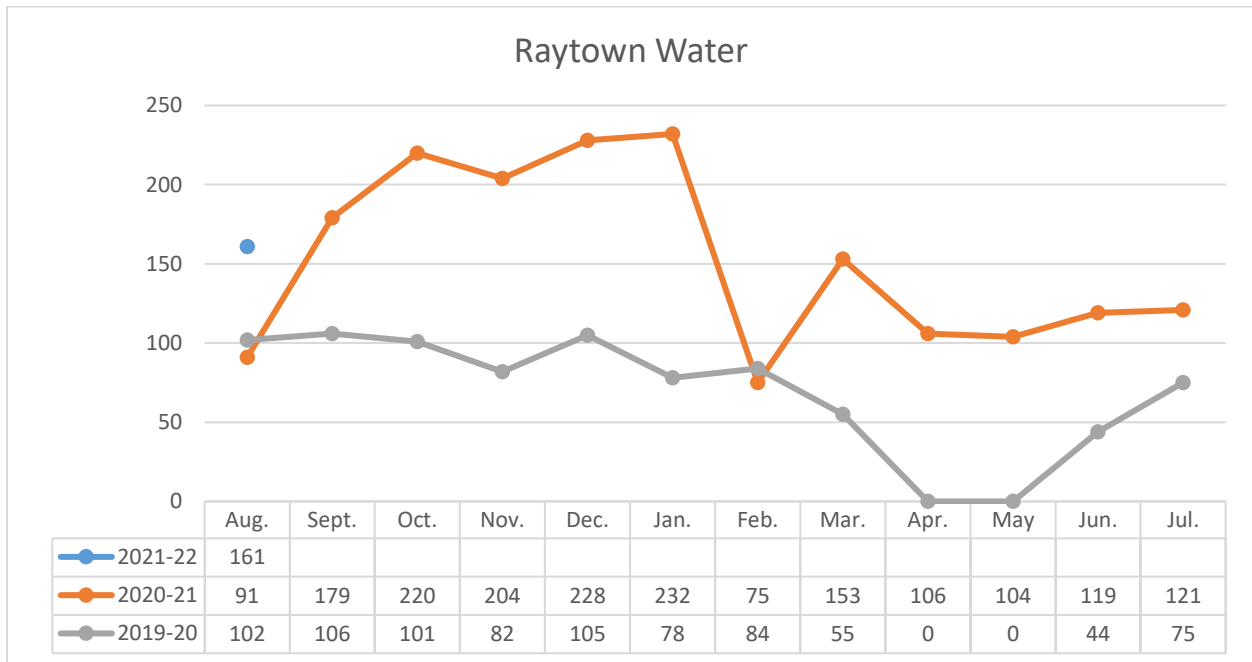
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 5% fewer Missouri-American customers who participated in payment plans in November 2021 versus November 2020 and 2% fewer in November 2021 than in October 2021. There were 98% more customers participating in payment plans in November 2021 versus pre-pandemic, November 2019.

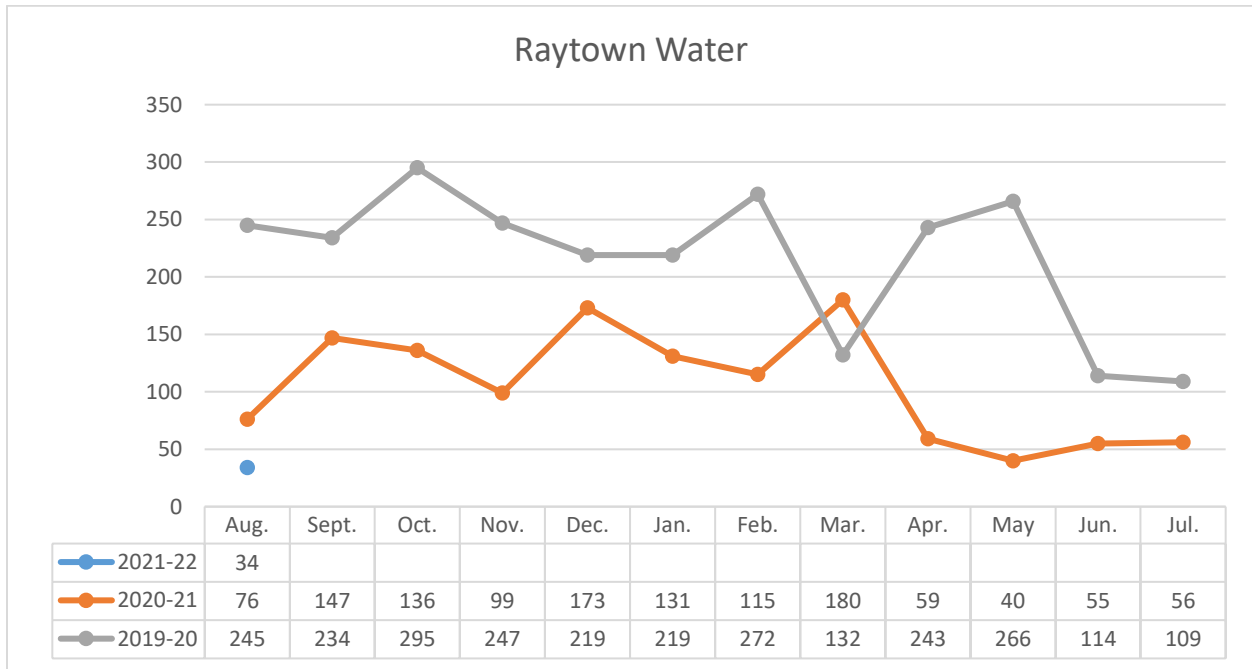
Questions 1 & 3 (Raytown Water)

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



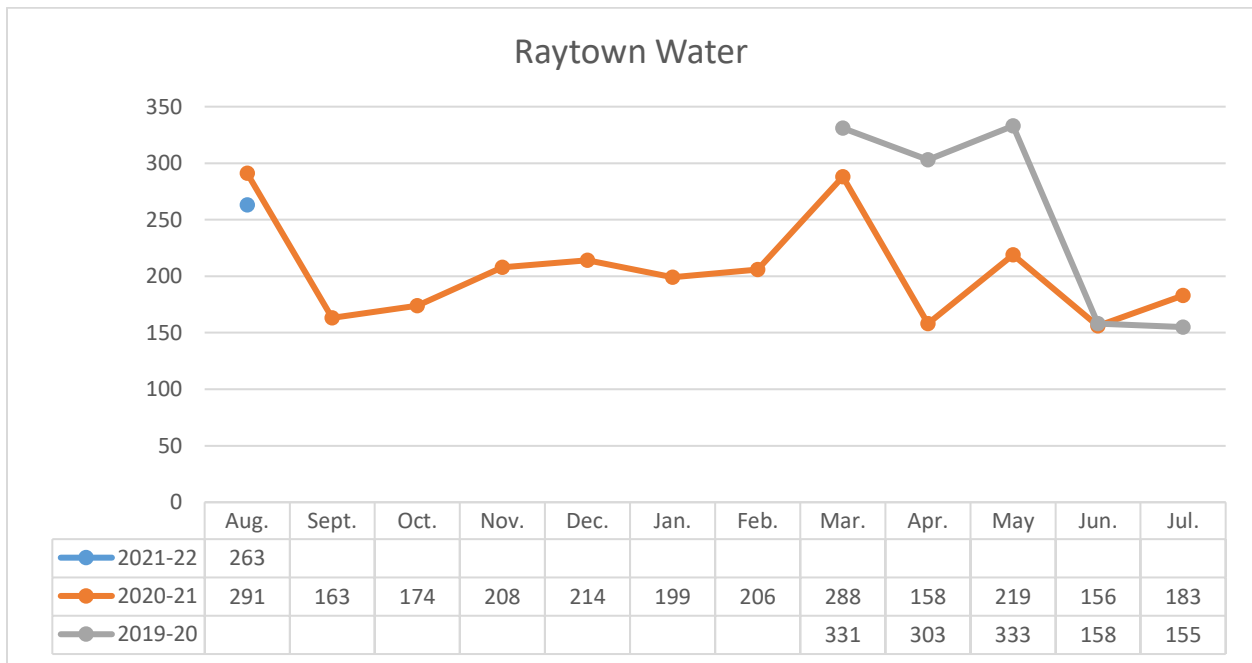
As shown in the previous graph, Raytown Water performed approximately 77% more disconnections for non-payment in August 2021 versus August 2020 and 33% more disconnections for non-payment in August 2021 versus July 2021. The number of actual disconnections by Raytown Water in August 2021 was approximately 55% more than the number projected by Raytown Water for the same month. There were 58% more disconnections in August 2021 versus pre-pandemic, August 2019.

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”



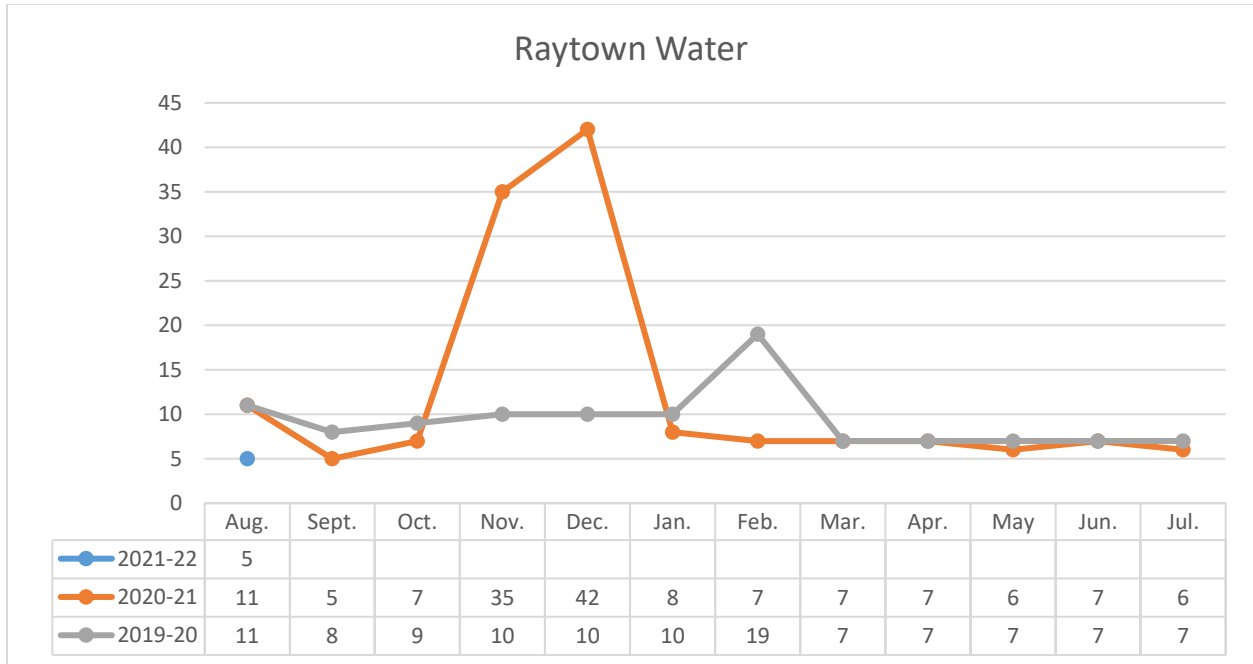
The previous data indicates that there were about 55% fewer Raytown Water customers with past-due accounts in August 2021 versus August 2020 and approximately 39% fewer in August 2021 than in July 2021. There were 86% fewer customers with past due accounts in August 2021 versus pre-pandemic, August 2019. 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 10% fewer customers who were not disconnected in August 2021 versus August 2020 and approximately 44% more in August 2021 than in July 2021. Staff is unable to compare August 2021 data to pre-pandemic data as Raytown Water was unable to provide historical data for August 2019.

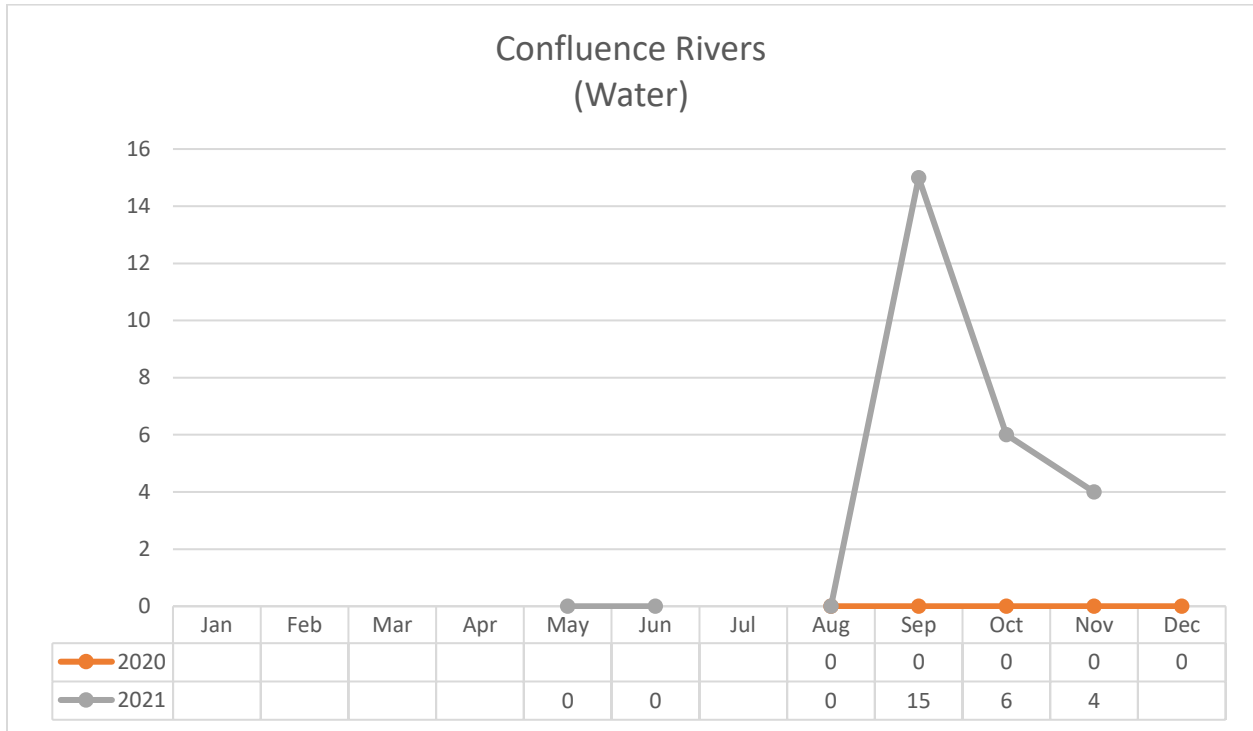
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were 55% fewer customers of Raytown Water who participated in payment plans in August 2021 versus August 2020. There was one fewer customer participating in a payment plan in August 2021 in comparison to July 2021. There were 55% fewer customers participating in payment plans in August 2021 versus pre-pandemic, August 2019.

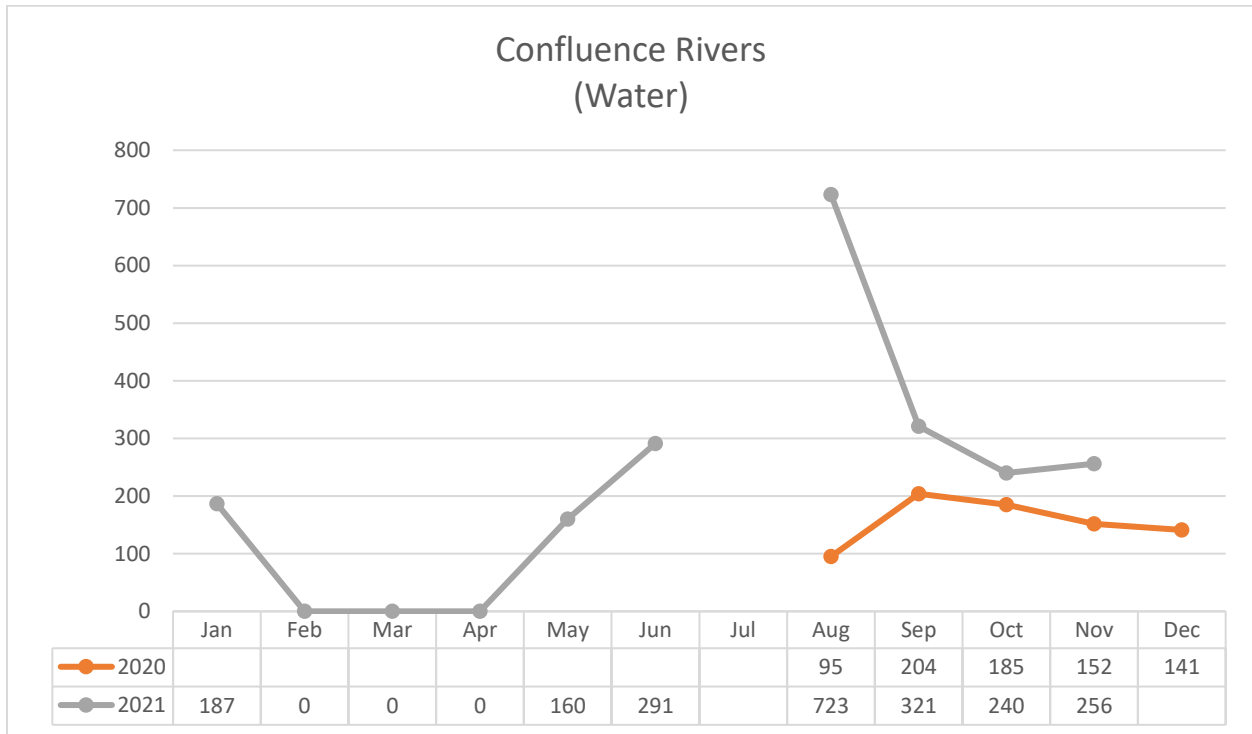
Questions 1 & 3 (Confluence Rivers - Water)

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



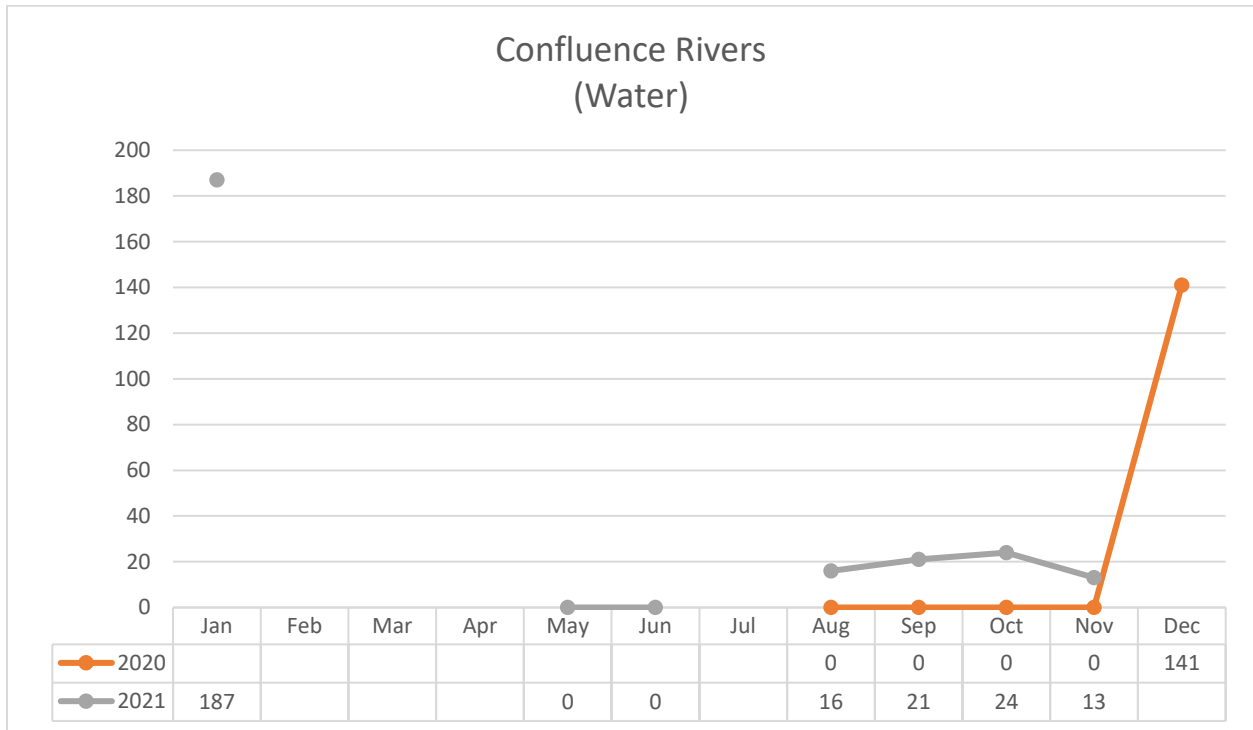
As shown in the previous graph, Confluence Rivers performed 4 disconnections in November 2021 and none in November 2020. There were 4 disconnections in November 2021 verses 6 in October 2021. A total of 24 disconnections were performed from August 2019 through February 2020 but that total was not broken down by month. Confluence Rivers completed 73% fewer disconnections than their forecasted number for November 2021.

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”



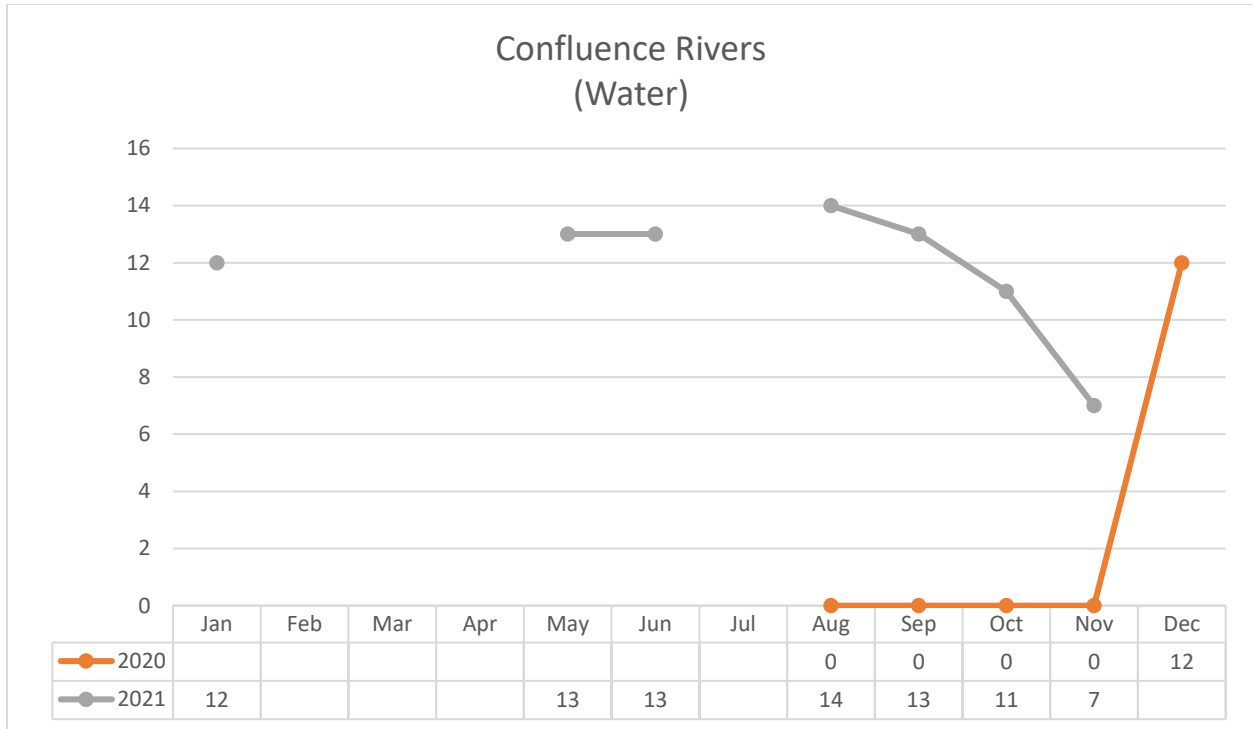
The previous data indicates there were approximately 68% more Confluence Rivers’ customers with past-due accounts in November 2021 versus November 2020 and approximately 7% more in November 2021 than in October 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there was a total of 37 customers with “past-due” accounts through February 2020. Confluence Rivers reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid with a minimum threshold of \$25.00 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



As shown by Confluence Rivers’ data, there were 13 customers who received a final disconnection notice but were not disconnected for non-payment of service in November 2021 compared to none in November 2020. There were 46% fewer customers who received a final notice in November 2021 than in October 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there were a total of 13 customers who received final disconnection notices but were not disconnected through February 2020.

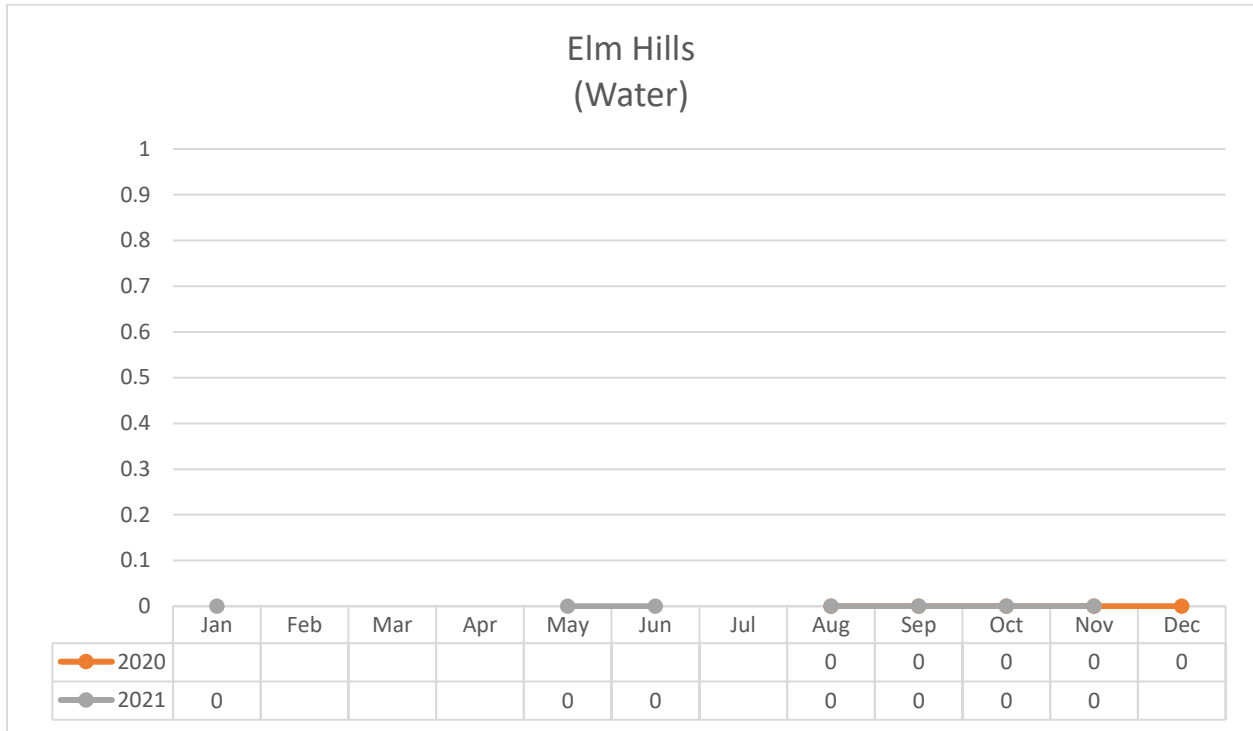
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were 7 Confluence Rivers’ customers who participated in payment plans in November 2021 versus none in November 2020. There were 4 fewer customer participating in a payment plan in November 2021 in comparison to October 2021. No monthly, comparative data was provided for August 2019 to July 2020, although the Company reported there were no customers who participated in payment plans through February 2020.

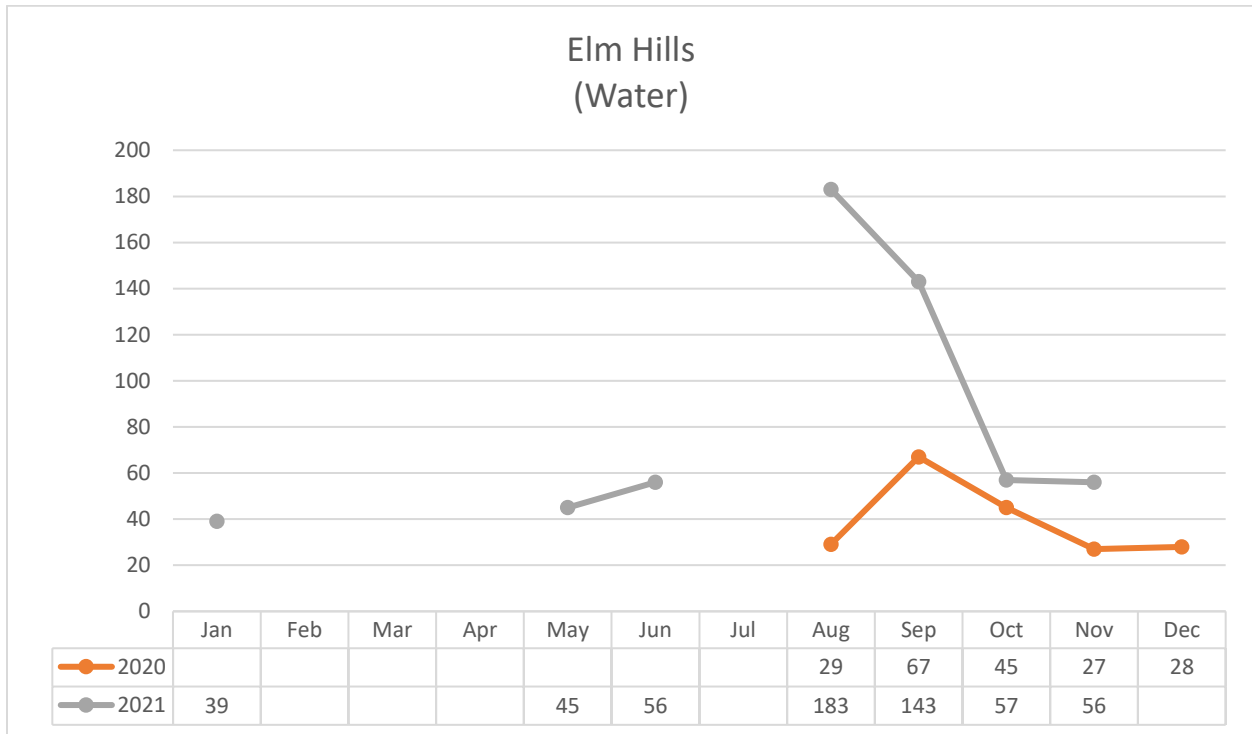
Questions 1 & 3 (Elm Hills - Water)

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



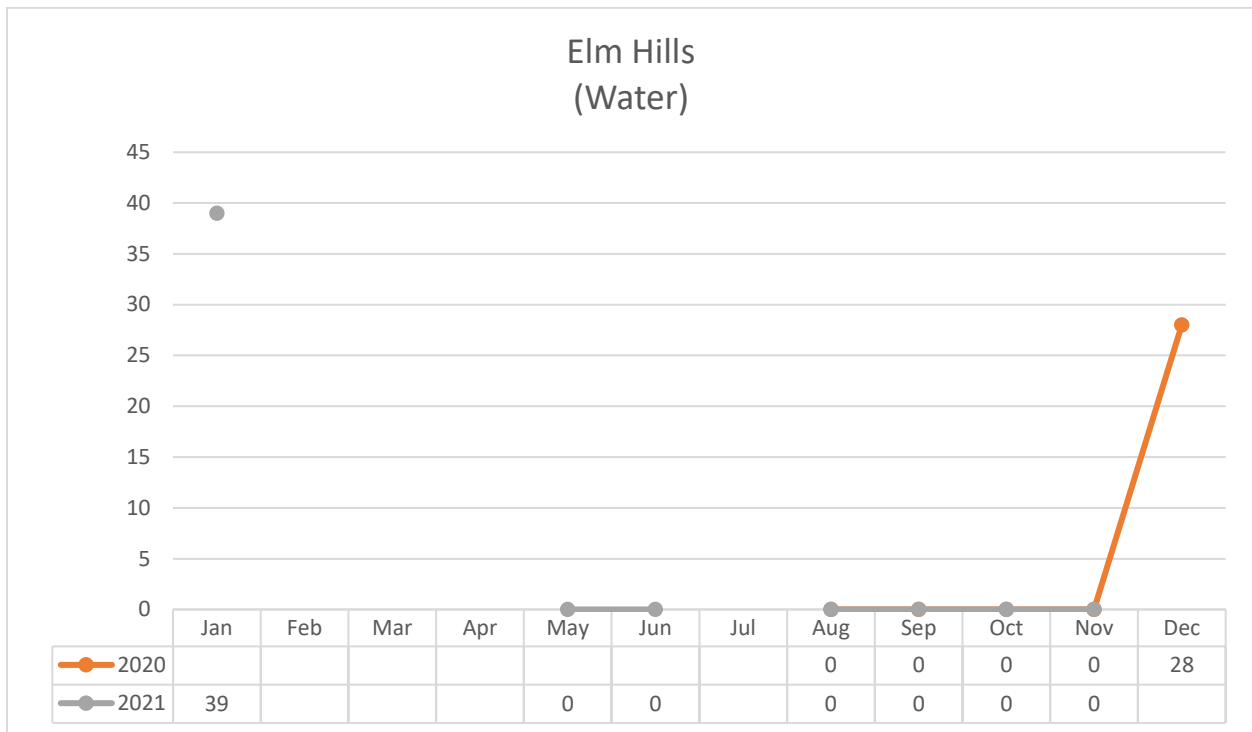
As shown in the previous graph, Elm Hills performed no disconnections in November 2021 or in November 2020. There were no disconnections for comparison in November 2021 or October 2021. There was no data was provided for August 2019 to July 2020, as no disconnections were performed during this time period. Elm Hills forecasted there would be 4 disconnections in November 2021, none were performed.

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



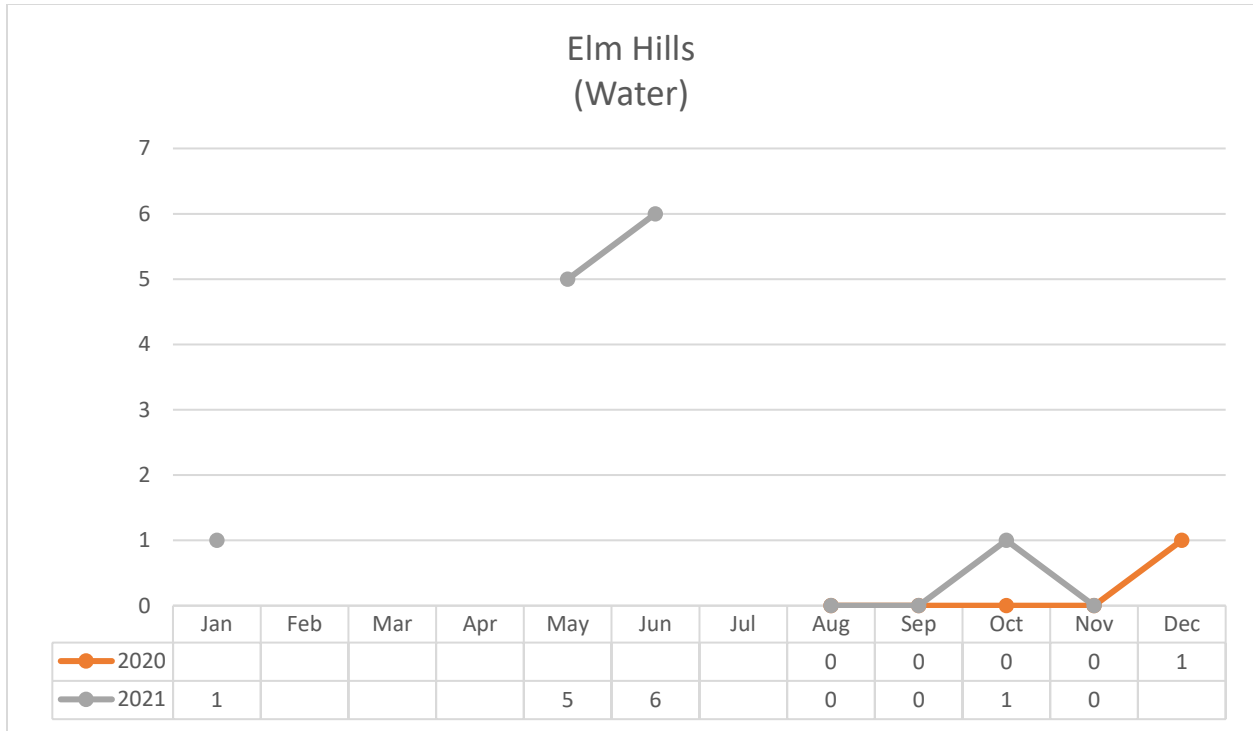
The previous data indicates there were about 107% more Elm Hills customers with past-due accounts in November 2021 versus November 2020 and 1 fewer in November 2021 compared to October 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there was a total of 1 customer with a “past-due” account through February 2020. Elm Hills reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid with a minimum threshold of \$25.00 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



As shown by Elm Hills’ data, there were no customers who received a final disconnection notice in November 2021 or in November 2020 but were not disconnected for non-payment of service. There were no customers who received a final disconnection but were not disconnected in comparison for November 2021, or for October 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there was a total of 1 customer who received final disconnection notices but was not disconnected through February 2020.

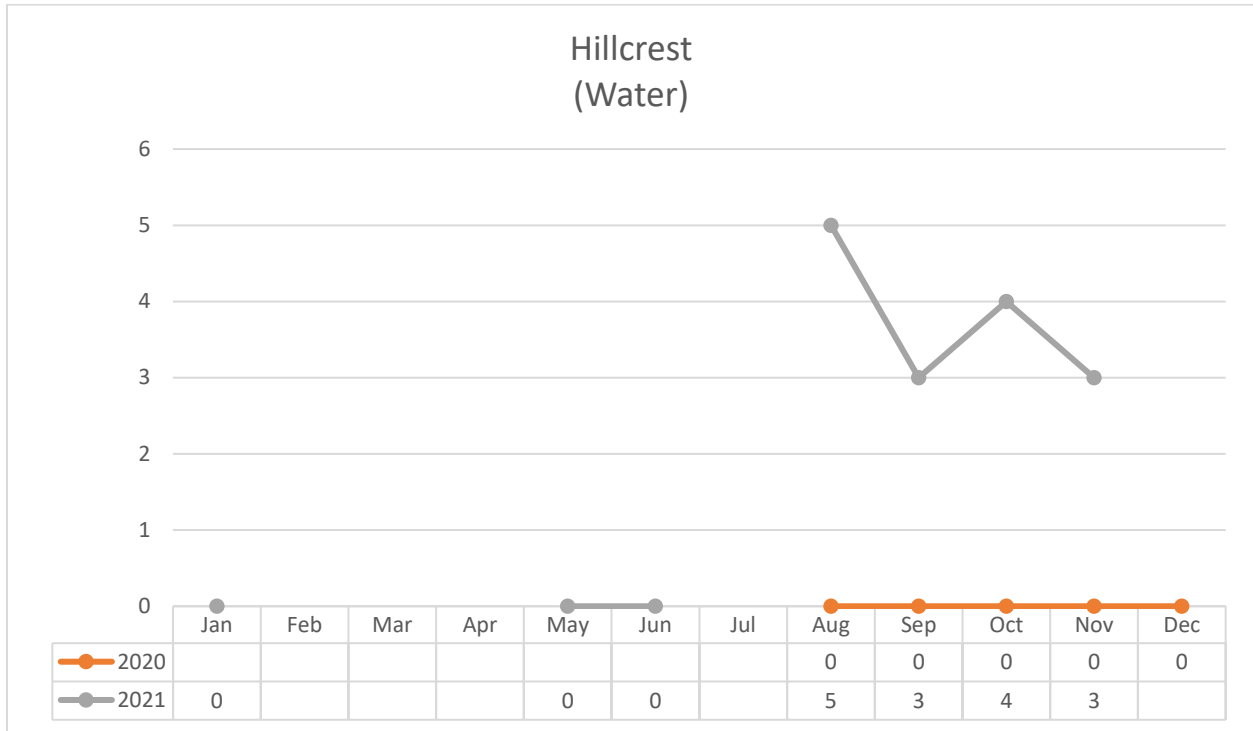
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were no Elm Hills customers who participated in a payment plan in November 2021 or in November 2020. There was one less customer who participated in a payment plan in November 2021, in comparison to October 2021. No monthly, comparative data was provided for August 2019 to July 2020.

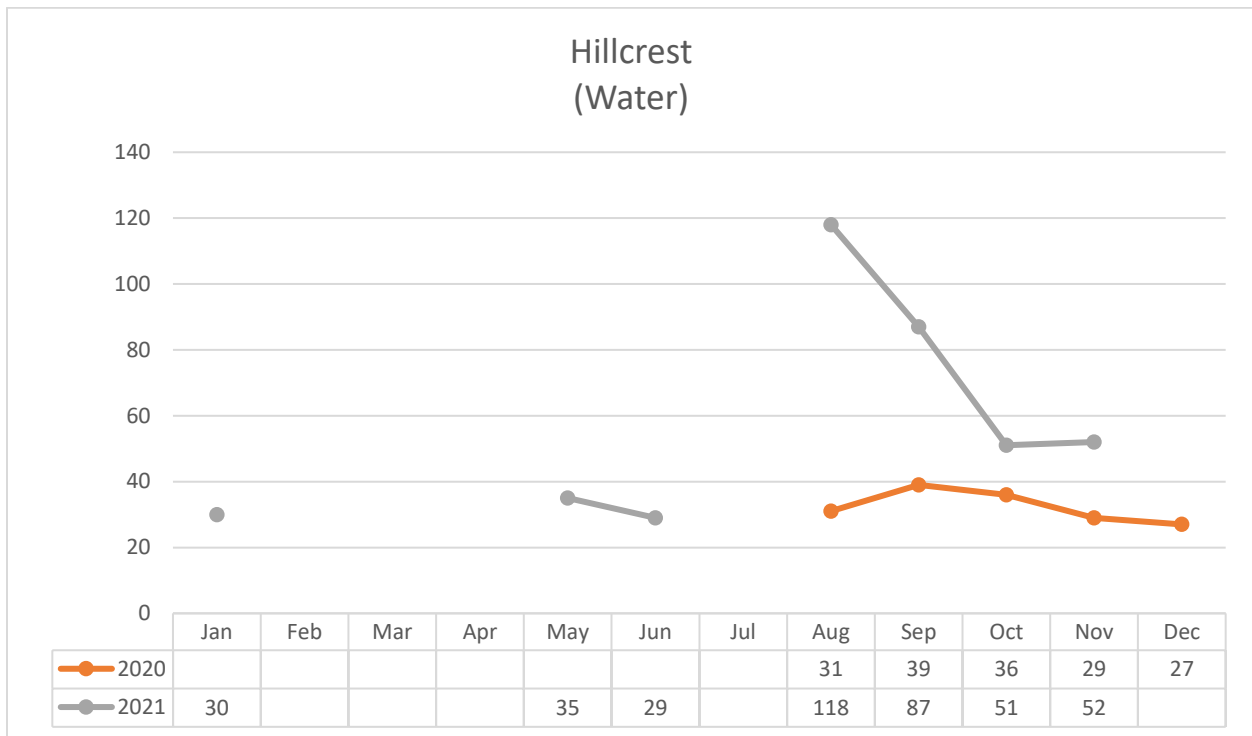
Questions 1 & 3 (Hillcrest - Water)

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



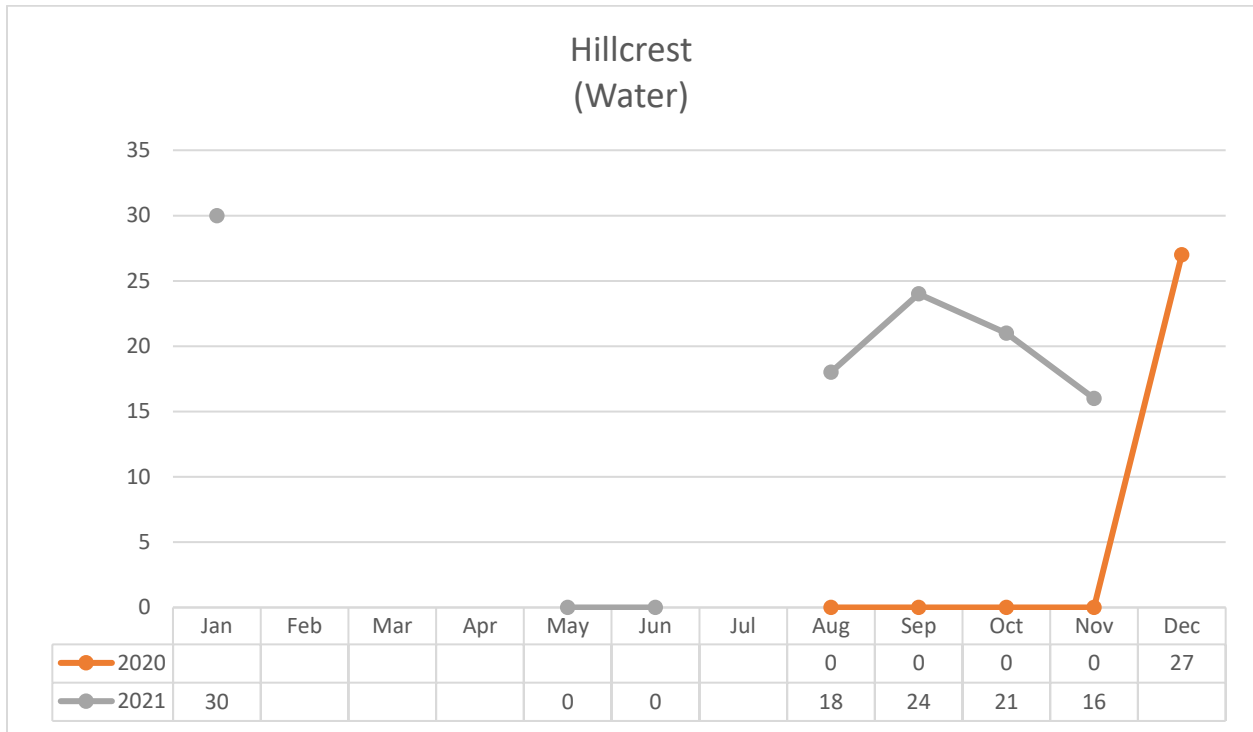
As shown in the previous graph, Hillcrest performed 3 disconnections in November 2021 versus none in November 2020. There were 3 disconnections performed in November 2021 versus 4 in October 2021. Hillcrest forecasted 3 disconnections for November 2021, and performed 3. No monthly, comparative data was provided for August 2019 to July 2020, although a total of 12 disconnections were performed through 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”



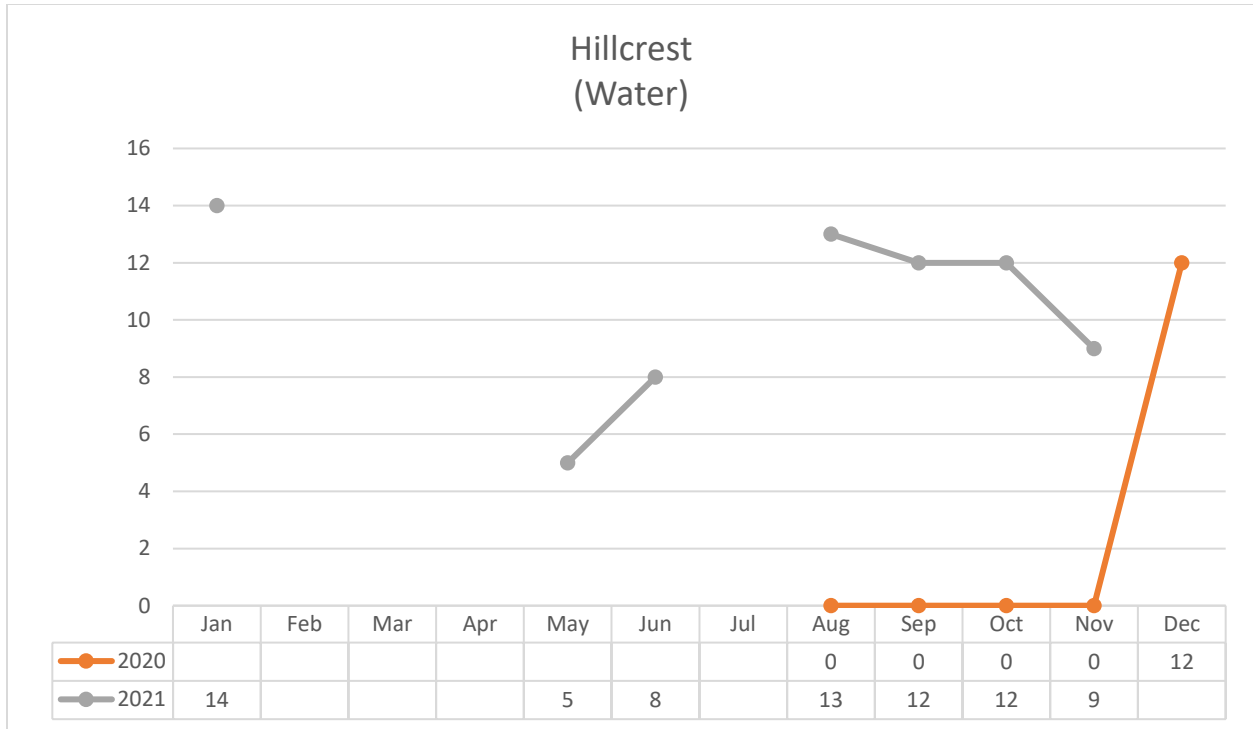
The previous data indicates there were about 79% more Hillcrest customers with past-due accounts in November 2021 versus November 2020 and 1 more customer with past-due accounts in November 2021 versus October 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there was a total of 16 customers with “past-due” accounts through February 2020. Hillcrest reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid with a minimum threshold of \$25.00 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



As shown by Hillcrest’s data, there were 16 customers who received a final disconnection notice in November 2021 versus none in November 2020. There were 5 fewer customers who received a final notice but have not been disconnection in November 2021 than in October 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there were a total of 4 customers through February 2020 who received final disconnection notices during this time period but were not disconnected.

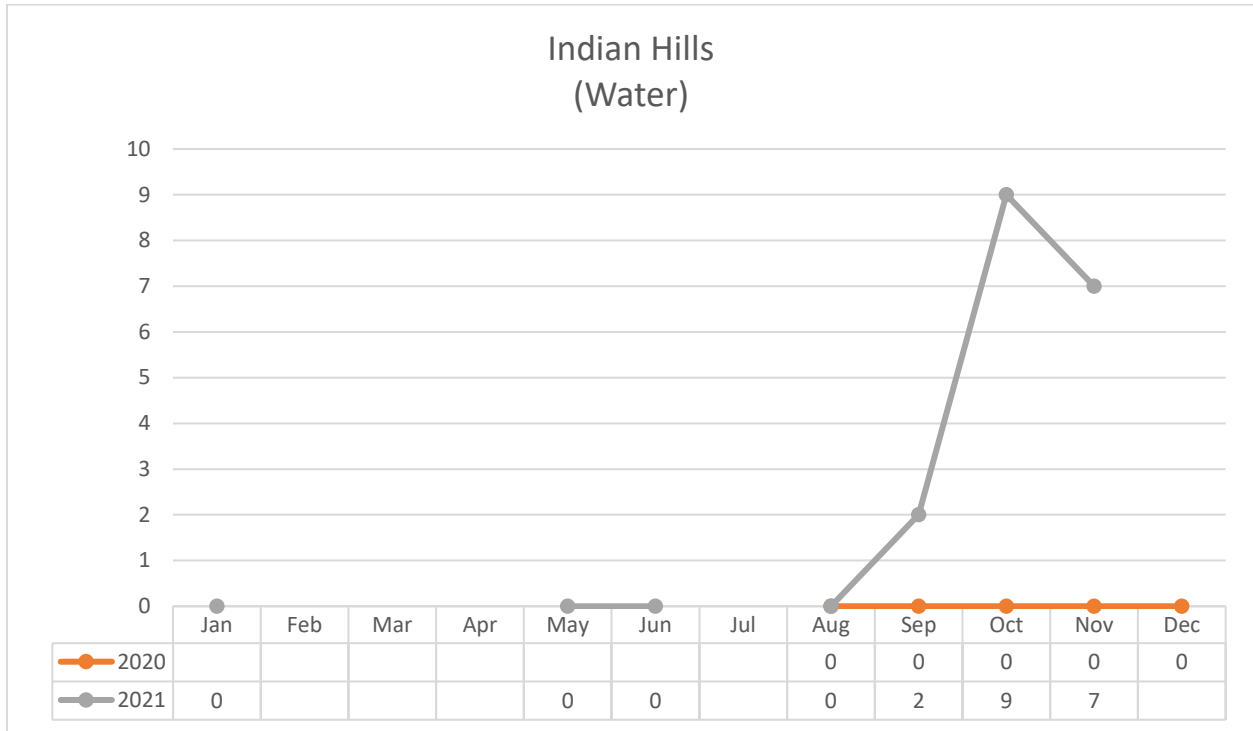
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were 9 Hillcrest customers who participated in payment plans in November 2021 versus none in November 2020. There were 3 less customers that participated in a plan in November 2021 versus October 2021. No monthly, comparative data was provided for August 2019 to July 2020, although the Company reported there were no customers who participated in payment plans through February 2020.

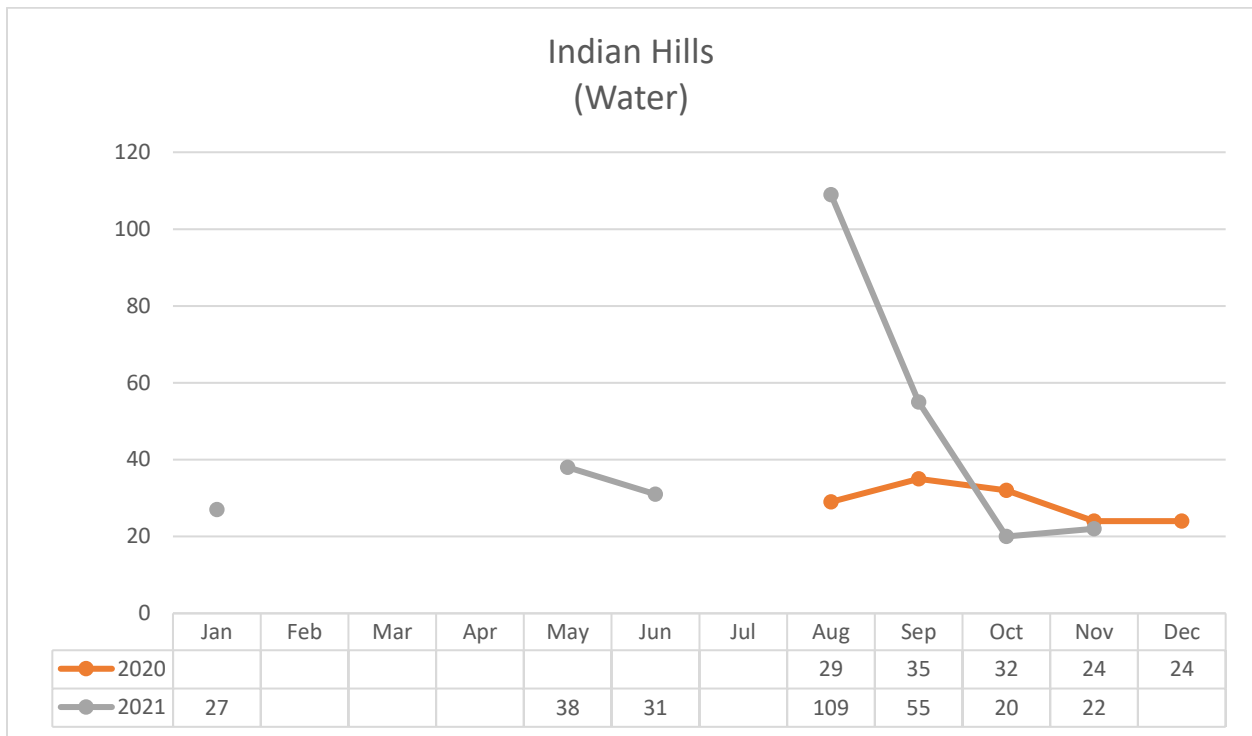
Questions 1 & 3 (Indian Hills - Water)

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



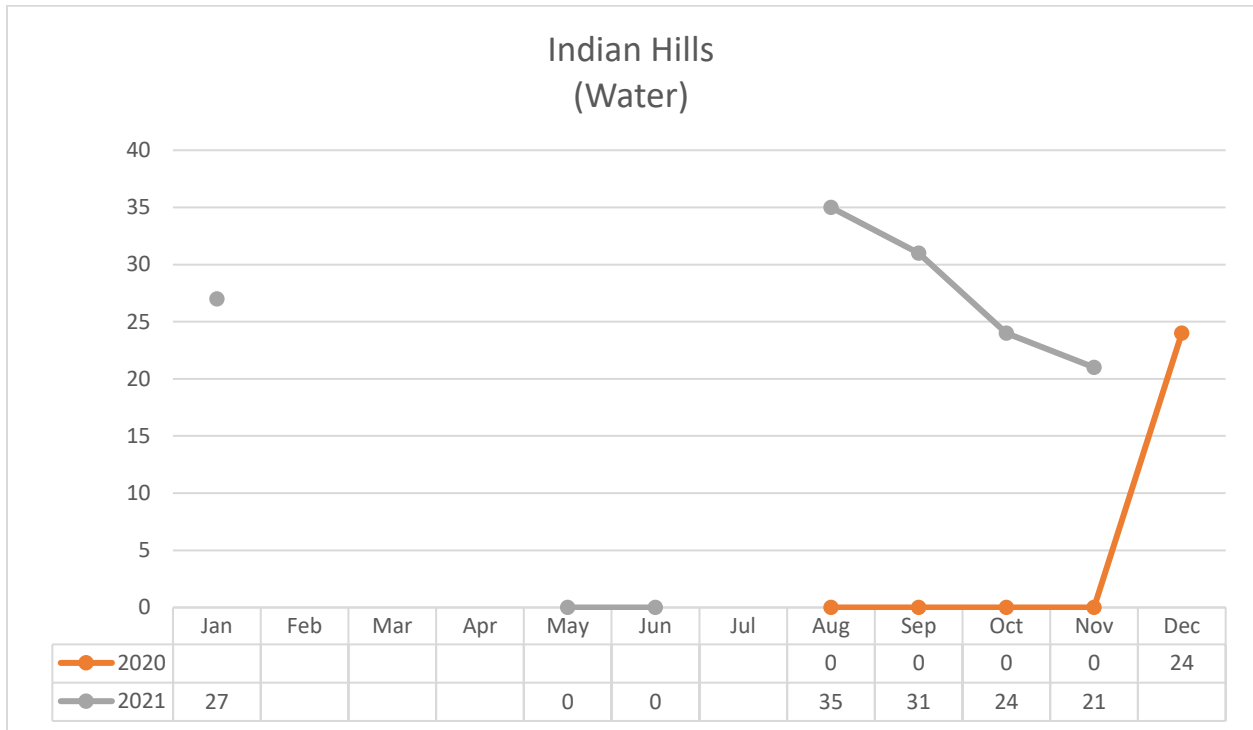
As shown in the previous graph, Indian Hills performed 7 disconnections in November 2021 versus none in November 2020. There were 2 fewer disconnections in November 2021 versus October 2021. Indian Hills projected 2 disconnections in November 2021 and performed 7. No monthly, comparative data was provided for August 2019 to July 2020, although a total of 6 disconnections were performed through 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”



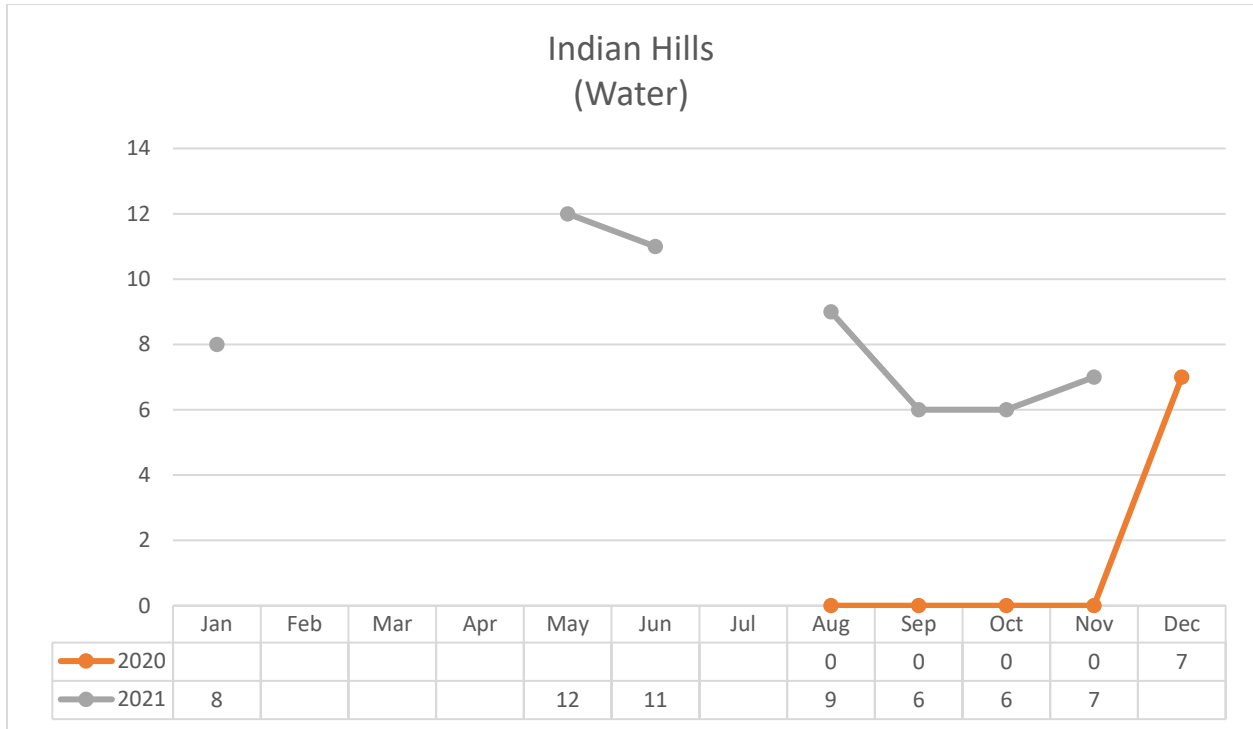
The previous data indicates there were 2 fewer Indian Hills customers with past-due accounts in November 2021 versus November 2020 and 2 more customers with past-due accounts in November 2021 versus October 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there was a total of 11 customers with “past-due” accounts through February 2020. Indian Hills reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid with a minimum threshold of \$25.00 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



As shown by Indian Hills’ data, there were 21 customers who received a final disconnection notice in November 2021 versus none in November 2020 and 3 fewer customers who received a final disconnection notice in November 2021 versus October 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there were a total of 6 customers who received final disconnection notices through February 2020 but were not disconnected.

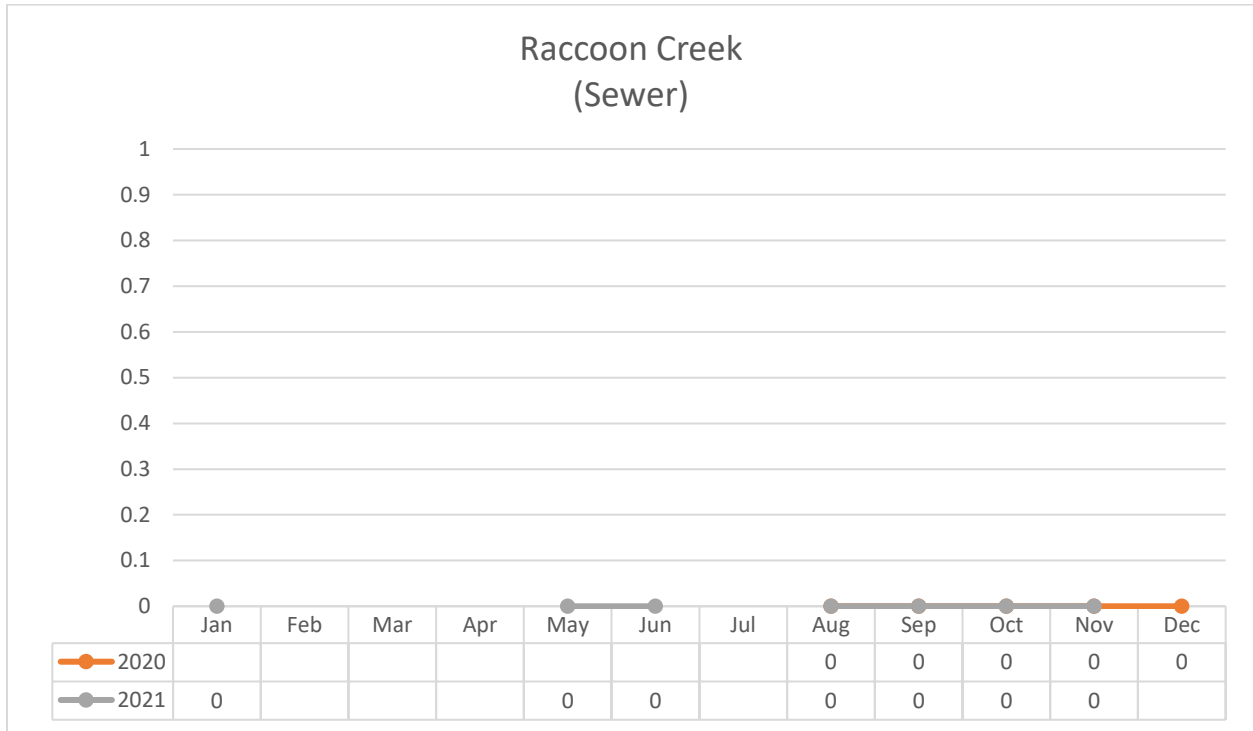
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were 7 Indian Hills customers who participated in payment plans in November 2021 versus none in November 2020 and 1 more customer who participated in payment plans in November 2021 versus October 2021. No monthly, comparative data was provided for August 2019 to July 2020, although the Company reported there was a total of 11 customers who participated in payment plans through February 2020.

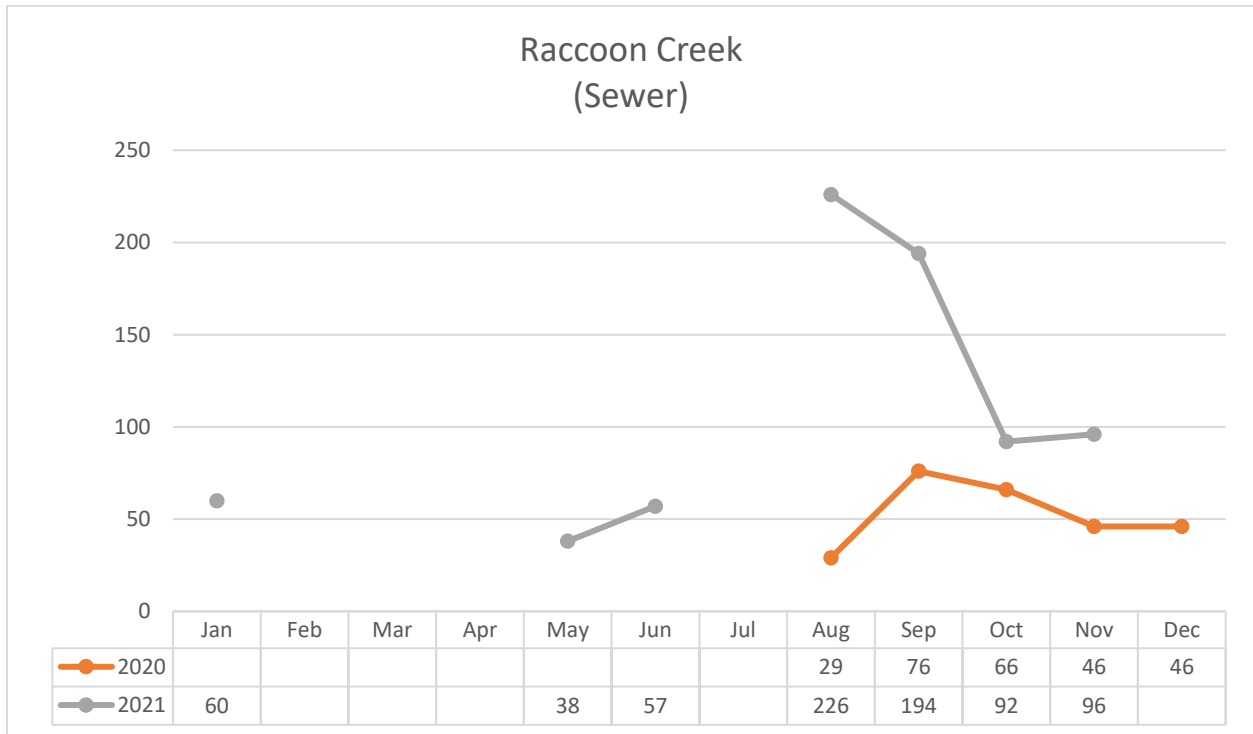
Questions 1 & 3 (Raccoon Creek - Sewer)

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



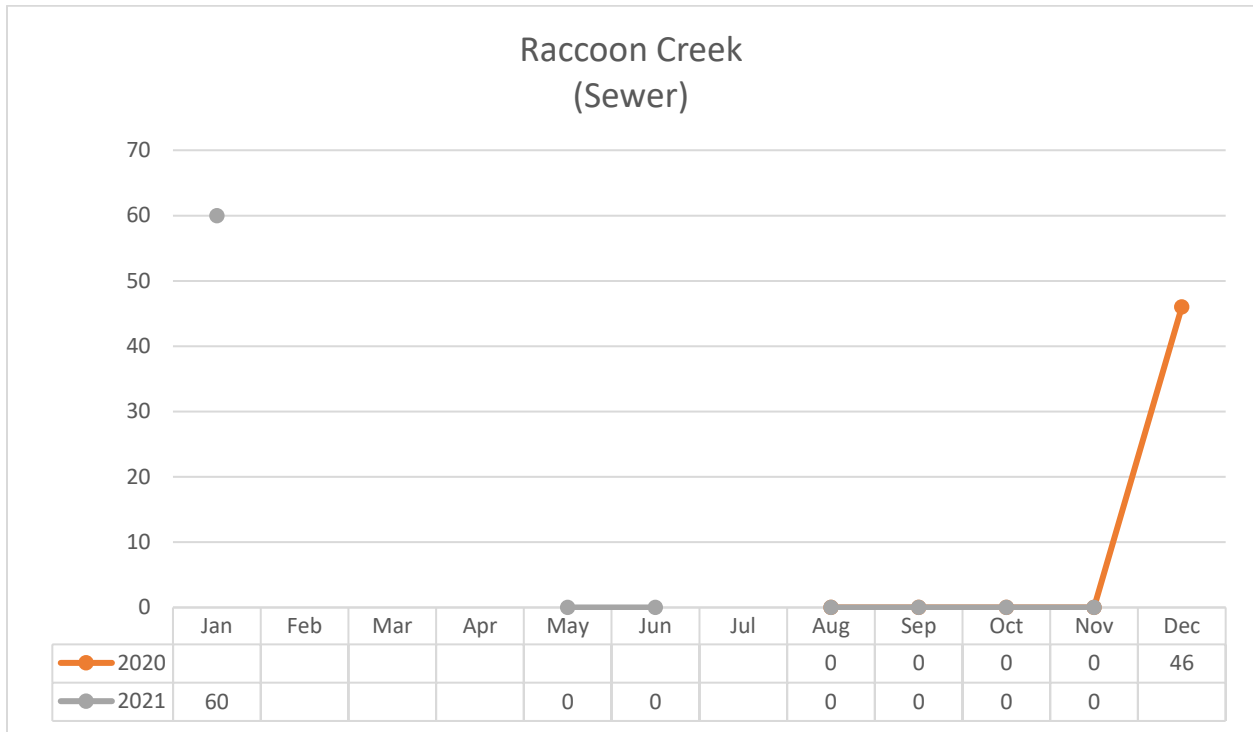
As shown in the previous graph, Raccoon Creek performed no disconnections in November 2021 or in November 2020 and no disconnections in November 2021 versus no disconnections in October 2021. Raccoon Creek forecasted 5 disconnections in November 2021 and performed none. No monthly, comparative data was provided for August 2019 to July 2020, although a total of 1 disconnection was performed through 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”



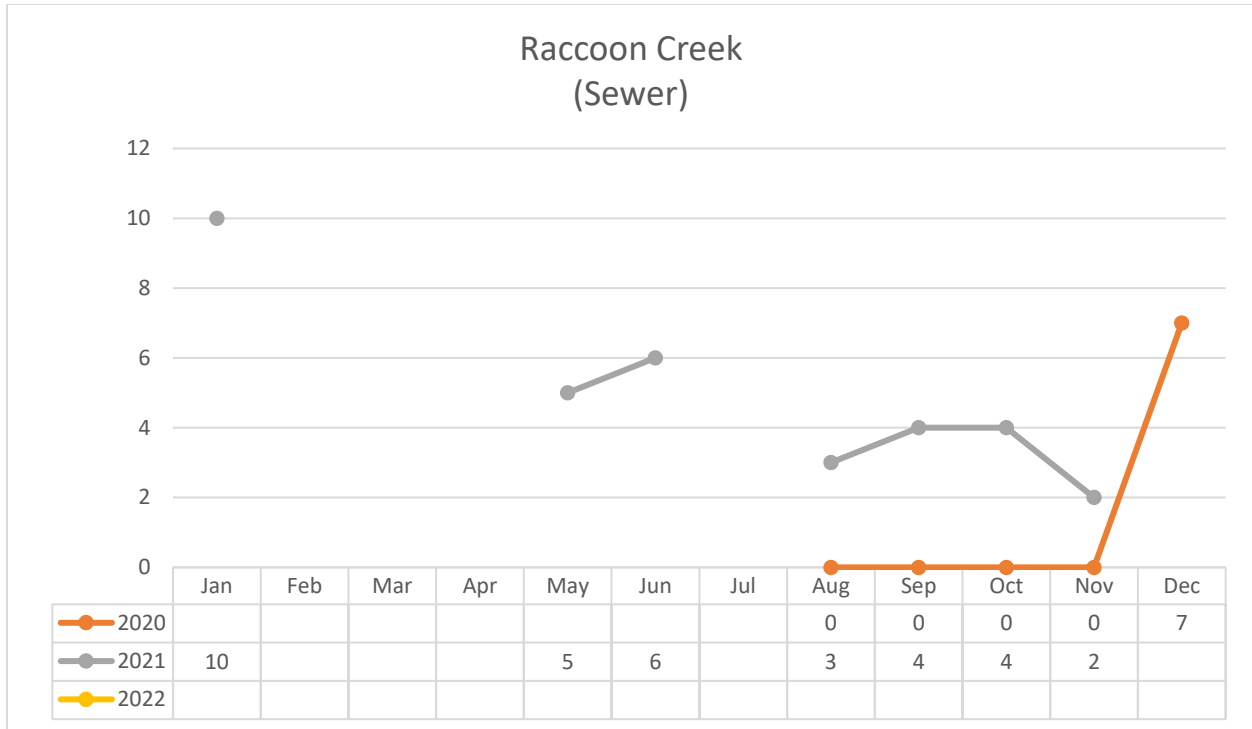
The previous data indicates there were about 109% more Raccoon Creek customers with past-due accounts in November 2021 versus November 2020 and 4 more customers with past-due accounts in November 2021 than October 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there were a total of 3 customers with “past-due” accounts through February 2020. Raccoon Creek reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid with a minimum threshold of \$25.00 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



As shown by Raccoon Creek’s data, there were no customers who received a final disconnection notice in November 2021 or in November 2020 and none in November 2021 in comparison to October 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there was a total of 2 customers who received final disconnection notices through February 2020 but were not disconnected.

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



The previous graph illustrates that there were 2 Raccoon Creek customers who participated in payment plans in November 2021 versus none in November 2020. There were 2 fewer customers who participated in a payment plan in November 2021 compared to October 2021. No monthly, comparative data was provided for August 2019 to July 2020, although the Company reported there were no customers who participated in payment plans through February 2020.

Question 2

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

Ameren Missouri (Electric)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
9,000	10,000	6,000	2,000	2,000	3,000

Ameren Missouri (Electric) stated that its projections are determined by taking an average of the past three years’ monthly disconnections.

Empire (Electric)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
490	600	250	35	15	35

Empire (Electric) projections are based off of the 2020-2021 disconnect data, with the assumption that the upcoming winter weather will be similar. Several factors prevent the Company from processing disconnects in the winter months (November – February). These factors include temperatures and the holidays which occur in November and December. Also, during this time period many customers participate in the Cold Weather Agreement (CWA) to prevent being disconnected for non-pay.

Evergy Metro (Electric)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
1850	1480	370	100	100	100

Evergy Metro responded that its estimates are based on recent and previous year data and resource capacity. November assumes reduced days eligible to cut for residential due to weather. December through February assumes commercial only due to likely Cold Weather Rule restrictions.

Evergy West (Electric)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
1250	1000	250	60	60	60

Evergy West responded that its estimates are based on recent and previous year data and resource capacity. November assumes reduced days eligible to cut for residential due to weather. December through February assumes commercial only due to likely Cold Weather Rule restrictions.

Ameren Missouri (Gas)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
170	200	35	25	20	40

Ameren Missouri (Gas) stated that its projections are determined by taking an average of the past three years' monthly disconnections.

Spire (Gas)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
4364	4138	1091	963	959	1949

Spire based its estimates on the average number of disconnects from 2017 to 2019 due to the COVID-19 related disconnection moratoriums in 2020.

Summit (Gas)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
116	29	17	13	27	59

Summit projections were determined by taking the sum of non-payment disconnections for 2018, 2019 and 2020 then dividing by 3 to get an average.

Empire (Gas)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
400	150	35	0	0	5

Empire (Gas) projections are based off of the 2020-2021 disconnect data, with the assumption that the upcoming winter weather will be similar. Several factors prevent the Company from processing disconnects in the winter months (November – February). These factors include temperatures and the holidays which occur in November and December. Also, during this time period many customers participate in the Cold Weather Agreement (CWA) to prevent being disconnected for non-pay.

Liberty (MNG) (Gas)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
400	250	150	100	75	75

Liberty MNG projections are based off of the 2020-2021 disconnect data, with the assumption that the upcoming winter weather will be similar. Several factors prevent the Company from processing disconnects in the winter months (November – February). These factors include temperatures and the holidays which occur in November and December. Also, during this time period many customers participate in the Cold Weather Agreement (CWA) to prevent being disconnected for non-pay.

Liberty (Water)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
25	30	25	10	0	0

Liberty Water based its projections off of the 2020-2021 disconnect data, with the assumption that the upcoming winter weather will be similar.

Missouri-American (Water)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022

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

Raytown Water

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022

As of the date of filing, Raytown Water has not provided updated data to project an estimated number of disconnections for non-payment of service for the six-month period of September 2021 through February 2022.

Confluence Rivers (Water)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
15	15	15	15	15	15

CSWR, LLC's Missouri entities have limited recent data to use for estimating future shut-offs. This is due in part to the moratorium on service disconnections during the pandemic and also the fact that many of the Company's customer connections were acquired over the last year, coinciding with pandemic restrictions. As shut-off procedures again become a regular part of CSWR's response to delinquencies, the Company expects that the percentage of customers eligible for shut-off procedures will go down. Based on Confluence Rivers' allocation of past-due accounts, CSWR, LLC expects to shut off approximately 15 customers per month for the 6 month period.

Elm Hills (Water)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
4	4	4	4	4	4

CSWR, LLC's Missouri entities have limited recent data to use for estimating future shut-offs. This is due in part to the moratorium on service disconnections during the pandemic and also the fact that many of the Company's customer connections were acquired over the last year, coinciding with pandemic restrictions. As shut-off procedures again become a regular part of CSWR's response to delinquencies, the Company expects that the percentage of customers eligible for shut-off procedures will go down. Based on Elm Hills' allocation of past-due accounts, CSWR, LLC expects to shut off approximately 4 customers per month for the 6 month period.

Hillcrest (Water)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
3	3	3	3	3	3

CSWR, LLC's Missouri entities have limited recent data to use for estimating future shut-offs. This is due in part to the moratorium on service disconnections during the pandemic and also the fact that many of the Company's customer connections were acquired over the last year,

coinciding with pandemic restrictions. As shut-off procedures again become a regular part of CSWR's response to delinquencies, the Company expects that the percentage of customers eligible for shut-off procedures will go down. Based on Hillcrest's allocation of past-due accounts, CSWR, LLC expects to shut off approximately 3 customers per month for the 6 month period.

Indian Hills (Water)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
2	2	2	2	2	2

CSWR, LLC's Missouri entities have limited recent data to use for estimating future shut-offs. This is due in part to the moratorium on service disconnections during the pandemic and also the fact that many of the Company's customer connections were acquired over the last year, coinciding with pandemic restrictions. As shut-off procedures again become a regular part of CSWR's response to delinquencies, the Company expects that the percentage of customers eligible for shut-off procedures will go down. Based on Indian Hills' allocation of past-due accounts, CSWR, LLC expects to shut off approximately 2 customers per month for the 6 month period.

Raccoon Creek (Sewer)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
5	5	5	5	5	5

CSWR, LLC's Missouri entities have limited recent data to use for estimating future shut-offs. This is due in part to the moratorium on service disconnections during the pandemic and also the fact that many of the Company's customer connections were acquired over the last year, coinciding with pandemic restrictions. As shut-off procedures again become a regular part of CSWR's response to delinquencies, the Company expects that the percentage of customers eligible for shut-off procedures will go down. Based on Raccoon Creek's allocation of past-due accounts, CSWR, LLC expects to shut off approximately 5 customers per month for the 6 month period.