

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

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

Respectfully Submitted,

/s/ Ron Irving

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 31st day of October, 2022.

/s/ Ron Irving

MISSOURI PUBLIC SERVICE COMMISSION

STAFF REPORT



A WORKING CASE TO CONSIDER BEST PRACTICES FOR RECOVERY OF PAST-DUE UTILITY CUSTOMER PAYMENTS AFTER THE COVID-19 PANDEMIC EMERGENCY

FILE NO. AW-2020-0356

October 31, 2022

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Staff Report on Utility Data Request Responses in

File No. AW-2020-0356

On August 19, 2020, the Missouri Public Service Commission (“Commission” or “PSC”) issued its *Order Directing Staff to Gather Information about Utility Disconnections*. In its Order, the Commission directed 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 15th day of each following month.¹

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 assumptions used to develop these projections. 3) Please provide the

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.

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 15th 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 July, August, and September 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”).

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 September 2022 (yellow dots and line). As this report is updated in the future, the yellow dots and line will extend through future months. This method of presentation will allow for a direct comparison of the reported information from August 2019 to September 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 September 2022 compared to August 2022).

Summary of Responses to Question 1

For question 1a, about the same number of utilities reported increases or decreases in the number of customer disconnections in the 3rd quarter of 2022 compared to the 2nd quarter of 2022. All but three utilities reported an increase in customer disconnections for the 3rd quarter of 2022 as compared to the 3rd quarter of 2021.

For Question 1b, all of the water utilities reported increases in the number of past-due customer accounts in the 3rd quarter of 2022 compared to the 2nd quarter of 2022. All but three utilities reported increases in the number of past-due customer accounts in the 3rd quarter of 2022 as compared to the 3rd quarter of 2021.

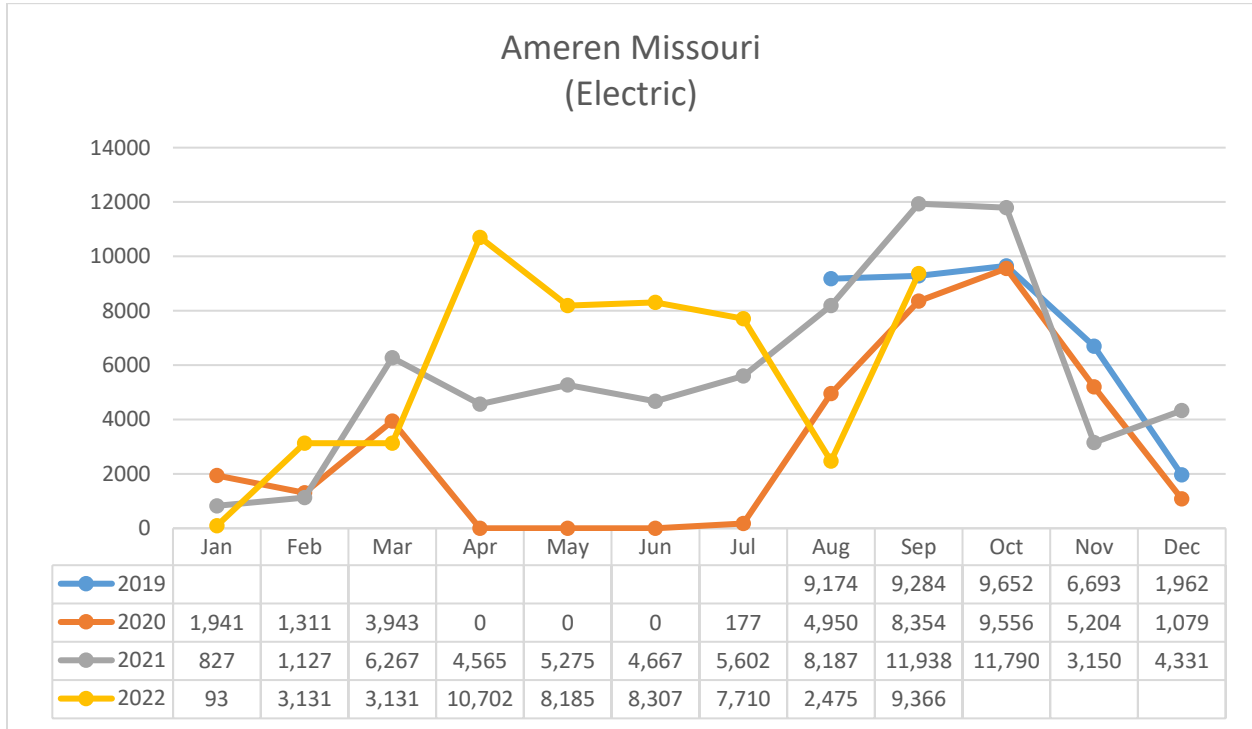
For Question 1c, all utilities but one, reported increases in the number of customer who have received final disconnection notices but have not yet been disconnected in the 3rd quarter of 2022 as compared to the 3rd quarter of 2021. In Staff's last quarterly report, this also occurred for the 2nd quarter of 2022 when compared to 2021. Also, a little more than half of the utilities reported increases in this metric in the 3rd 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 3rd quarter of 2022 compared to the 2nd quarter of 2022 and the 3rd quarter of 2021. Also, one utility reported its lowest number of customers participating in payments plans since this reporting began, while one utility reported its highest number for this metric.

Individual Utility Responses:

Question 1 (Ameren Missouri – Electric)³

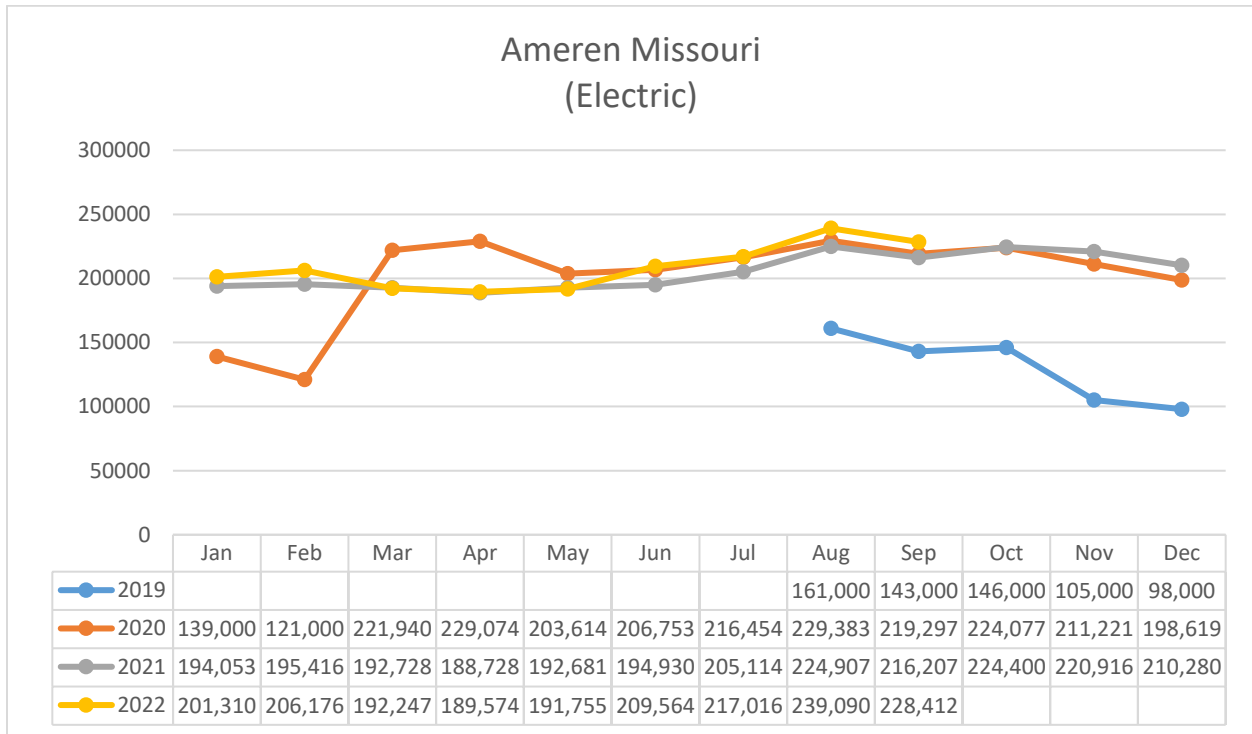
a) The number of disconnections for non-payment of services as of each month-end



As shown in the previous graph, Ameren Missouri had 38% more disconnections for non-payment in July 2022 versus July 2021, 70% fewer in August 2022 versus August 2021, and 22% fewer in September 2022 versus September 2021. There were about 7% fewer disconnections for non-payment in July 2022 compared to June 2022, 68% fewer in August 2022 compared to July 2022, and 278% more in September 2022 compared to August 2022. The number of actual disconnections by Ameren Missouri in July 2022 was less than 1% below the amount projected by Ameren Missouri for the same month, 78% below for August 2022, and 13% below in September 2022.

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

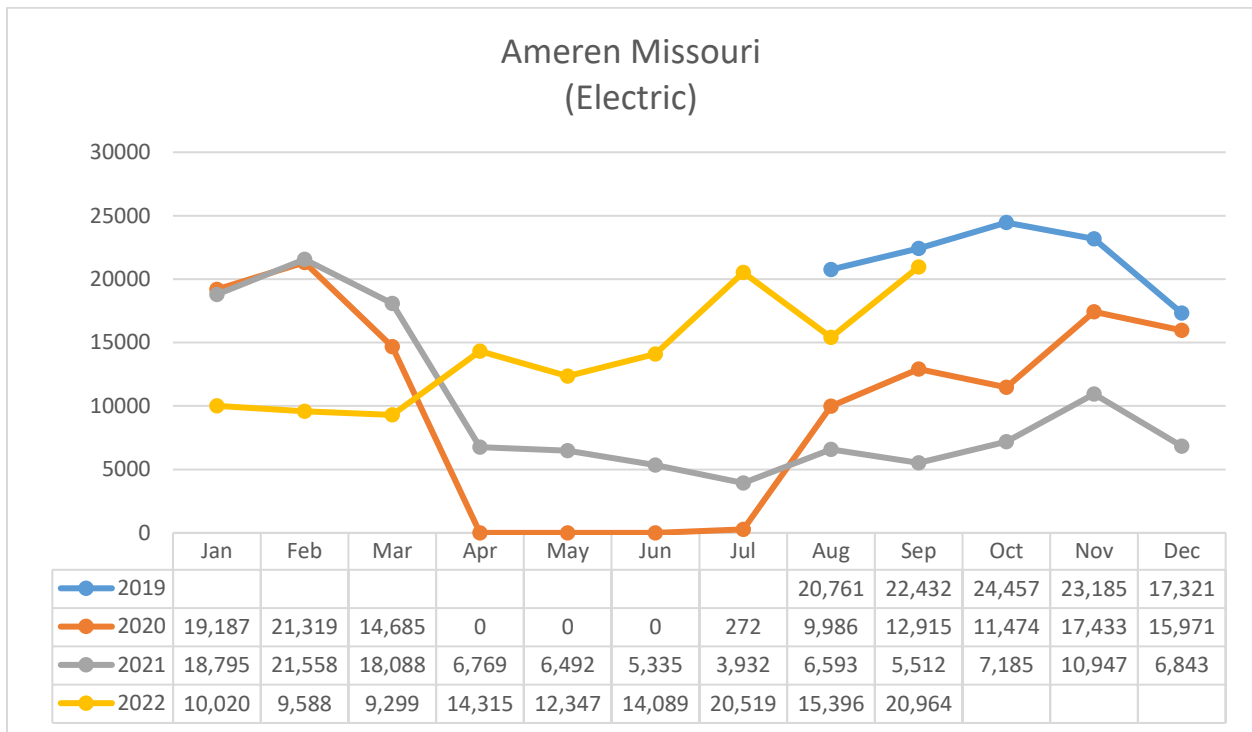
b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”⁴



The previous data indicates that there were approximately 6% more Ameren Missouri customers with past-due accounts in July 2022 versus July 2021, 6% more in August 2022 versus August 2021, and 6% more in September 2022 versus September 2021. There were 4% more customers with past-due accounts in July 2022 compared to June 2022, 10% more in August 2022 compared to July 2022, and 4% fewer in September 2022 versus August 2022. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

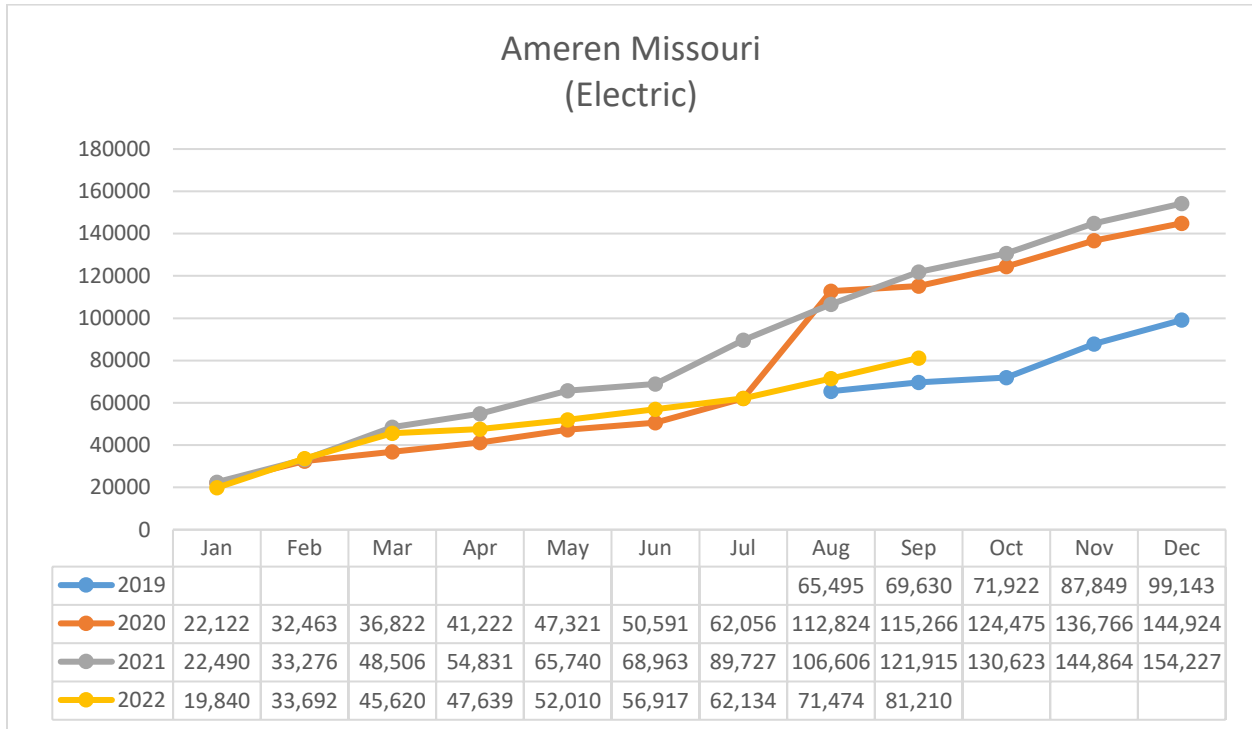
⁴ Per Data Request Response No. 0004.1s10 from Ameren, the numbers contained in previous data request responses were updated. An adjustment was made in data point (1b) due to certain regional areas were excluded for some months. May through November numbers were updated. The numbers were reviewed for 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 422% more customers who were not disconnected in July 2022 versus July 2021, 134% more in August 2022 versus August 2021, and 280% more in September 2022 versus September 2021. There were approximately 46% more customers who received a final disconnection notice in July 2022 compared to June 2022, 25% fewer in August 2022 compared to July 2022, and 36% more in September 2022 compared to August 2022.

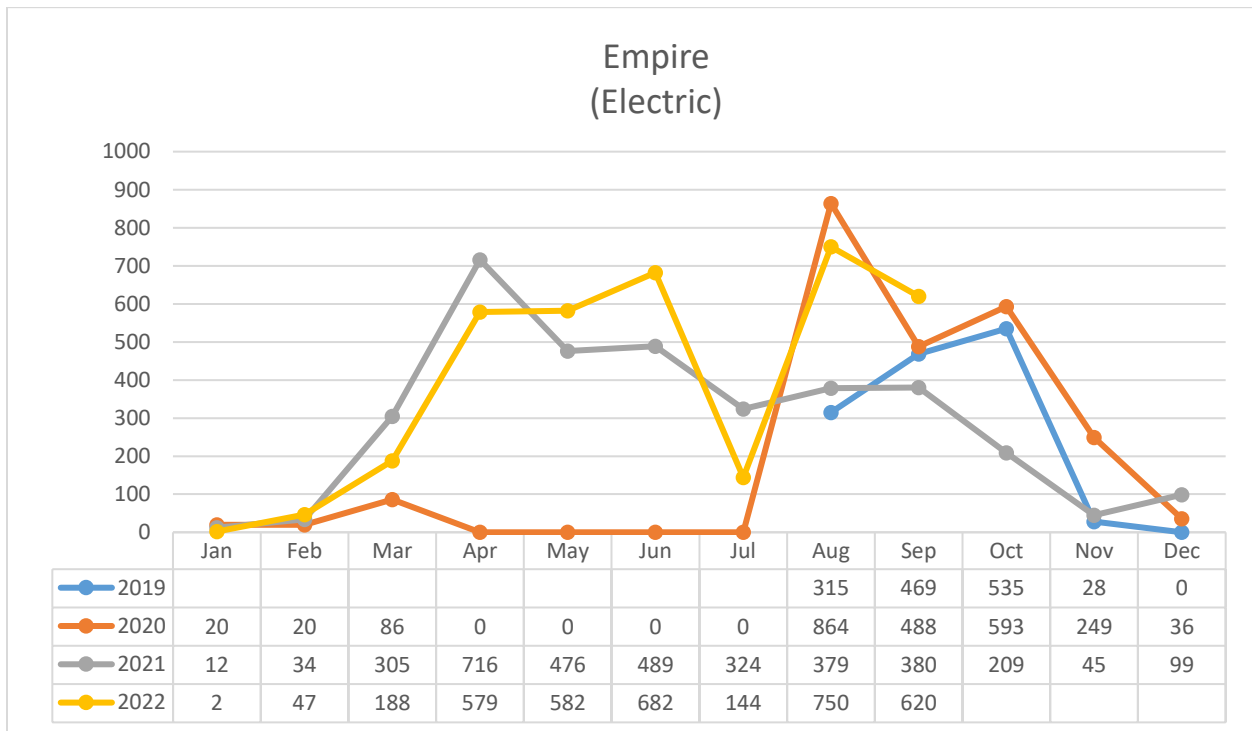
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 31% fewer Ameren Missouri customers who participated in payment plans in July 2022 versus July 2021, 33% fewer in August 2022 versus August 2021, and 33% fewer in September 2022 versus September 2021. There was 9% more customers who participated in payment plans in July 2022 compared to June 2022, 15% more in August 2022 compared to July 2022, and 14% more in September 2022 compared to August 2022.

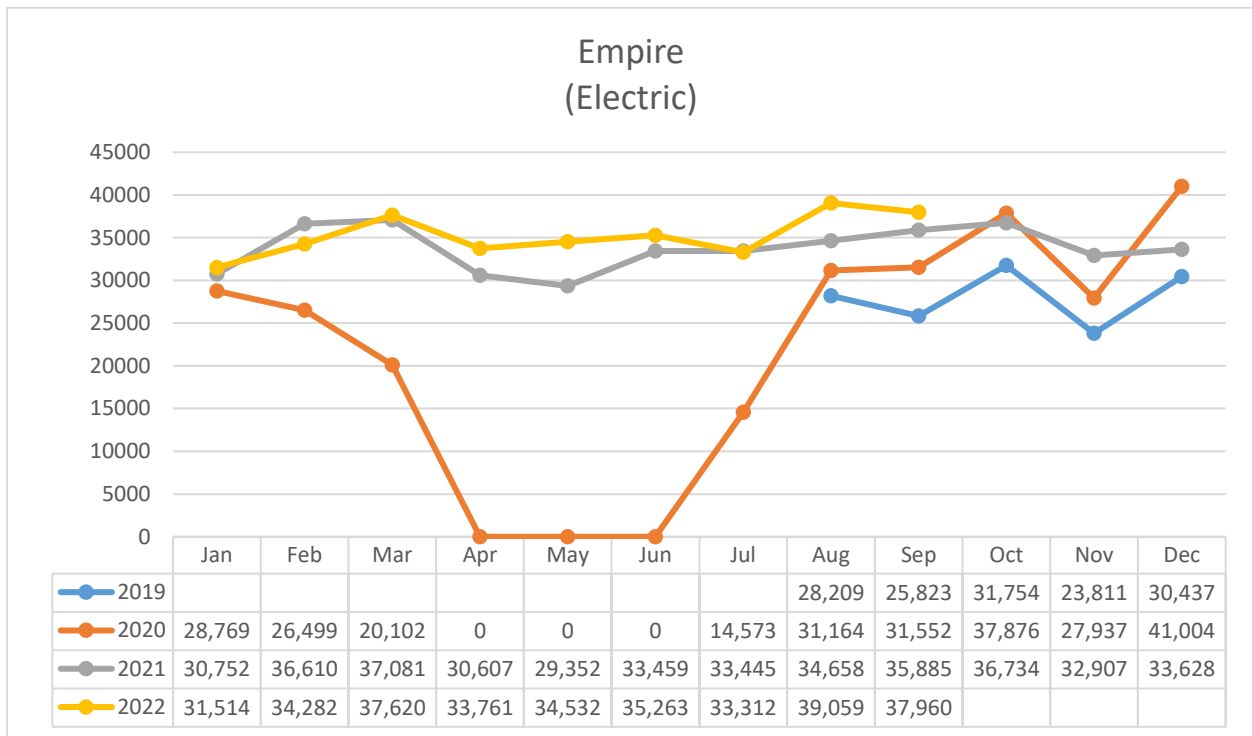
Question 1 (Empire – Electric)

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



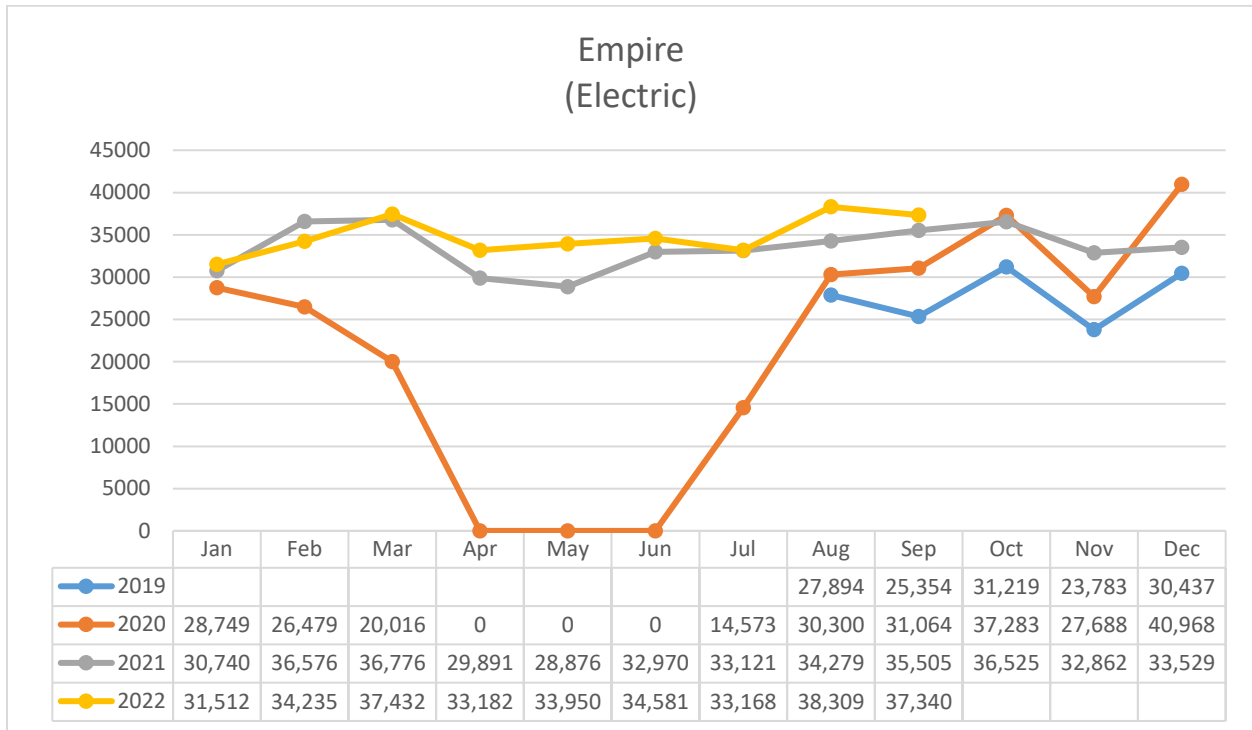
As shown in the previous graph, Empire performed approximately 56% fewer disconnections for non-payment in July 2022 versus July 2021, 98% more in August 2022 versus August 2021, and 63% more in September 2022 versus September 2021. There were about 79% fewer disconnections for non-payment in July 2022 compared to June 2022, 421% more in August 2022 compared to July 2022, and 17% fewer in September 2022 compared to August 2022. The number of actual disconnections for non-payment in July 2022 was 45% below the projected number of disconnections for the same month, 137% above for August 2022, and 151% above for September 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”



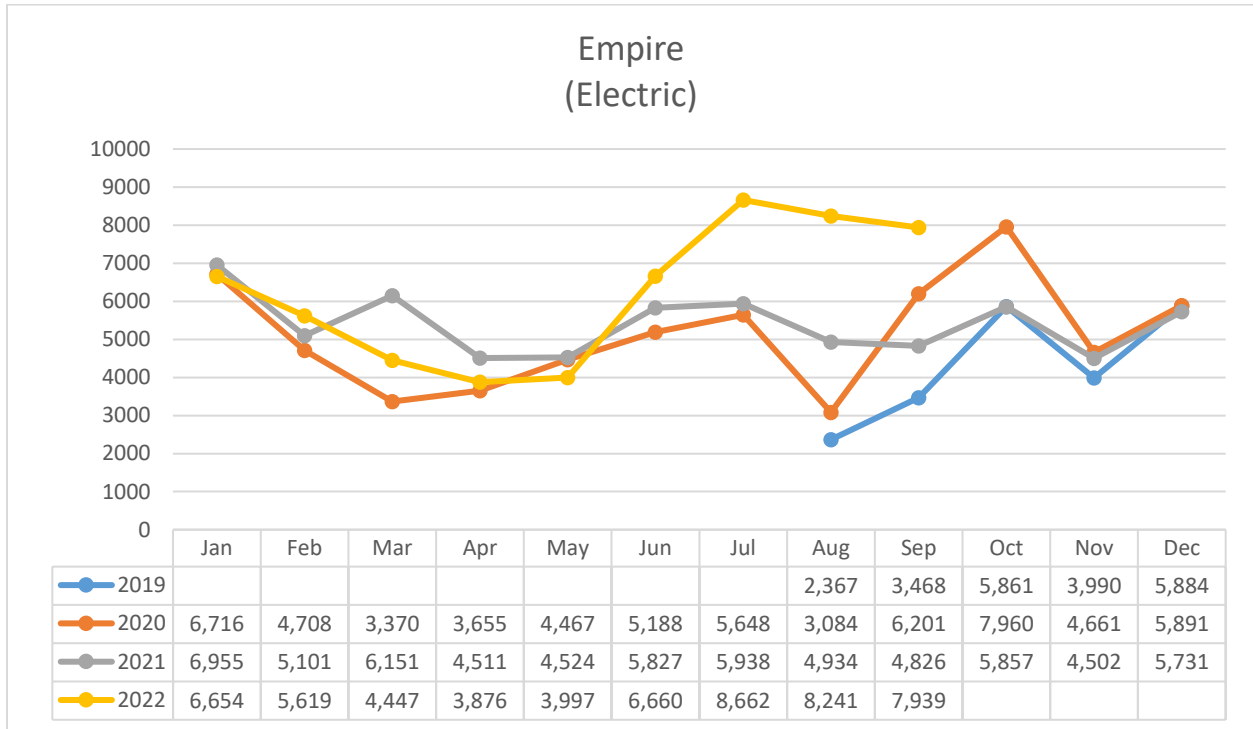
The previous data indicates that there was less than 1% fewer Empire customers with past-due accounts in July 2022 versus July 2021, 13% more in August 2022 versus August 2021, and 6% more in September 2022 versus September 2021. There were 6% fewer customers with past-due accounts in July 2022 compared to June 2022, 17% more in August 2022 compared to July 2022, and 3% fewer in September 2022 compared to August 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 July 2022 versus July 2021, 12% more in August 2022 versus August 2021, and 5% more in September 2022 versus September 2021. There were approximately 4% fewer customers who received a final disconnection notice in July 2022 compared to June 2022, 15% more in August 2022 compared to July 2022, and 3% fewer in September 2022 compared to August 2022.

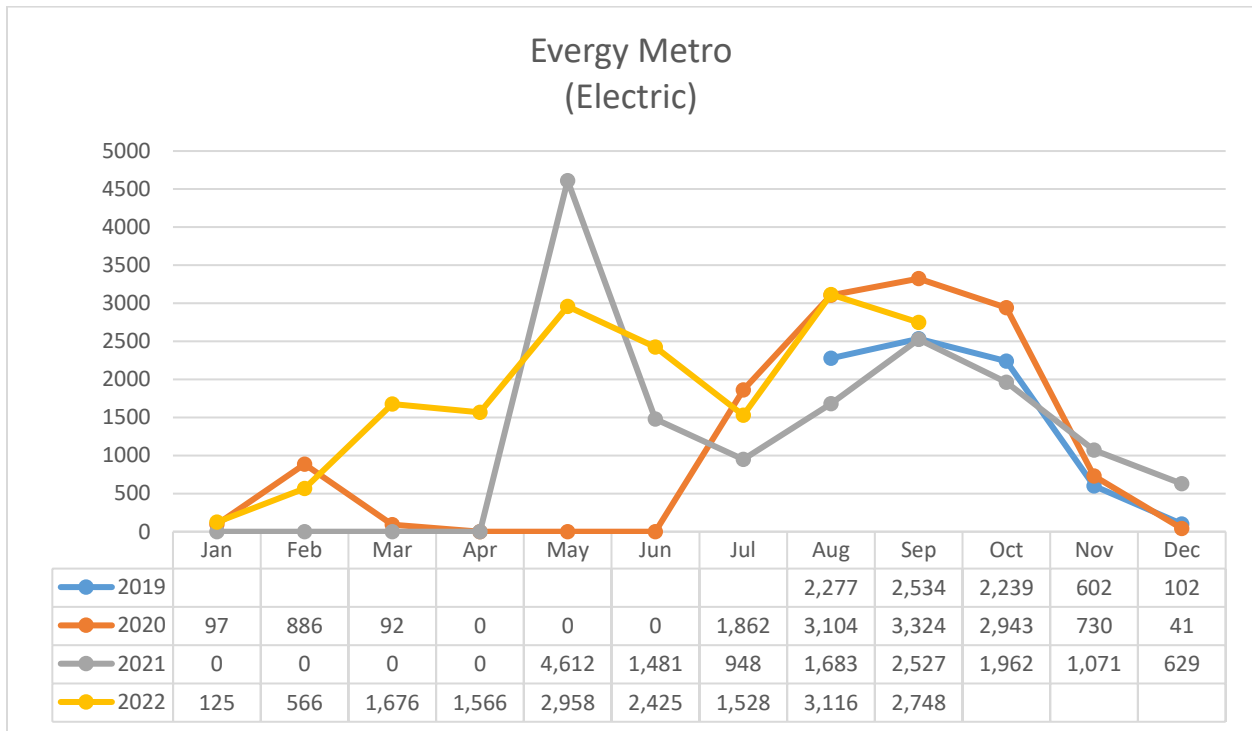
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 46% more Empire customers who participated in payment plans in July 2022 versus July 2021, 67% more in August 2022 versus August 2021, and 65% more in September 2022 versus September 2021. There were 30% more customers who participated in payment plans in July 2022 compared to June 2022, 5% fewer in August 2022 compared to July 2022, and 4% fewer in September 2022 compared to August 2022.

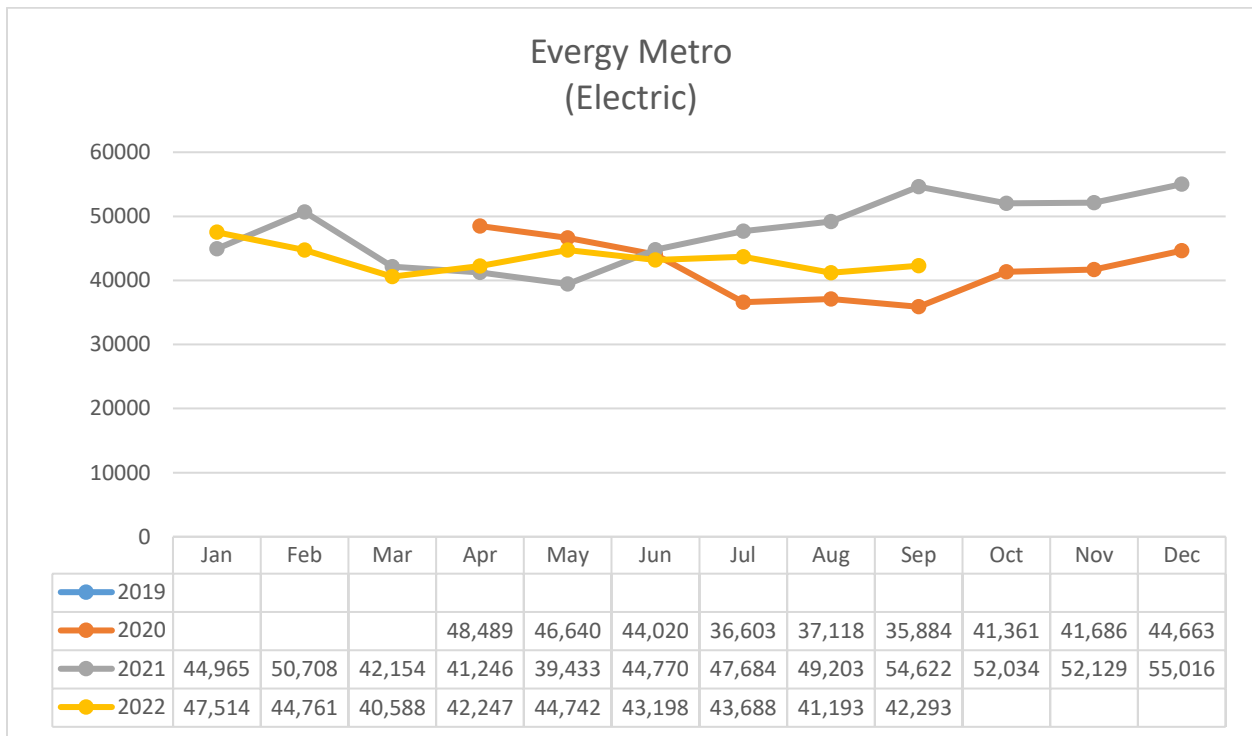
Question 1 (Evergny Metro – Electric)

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



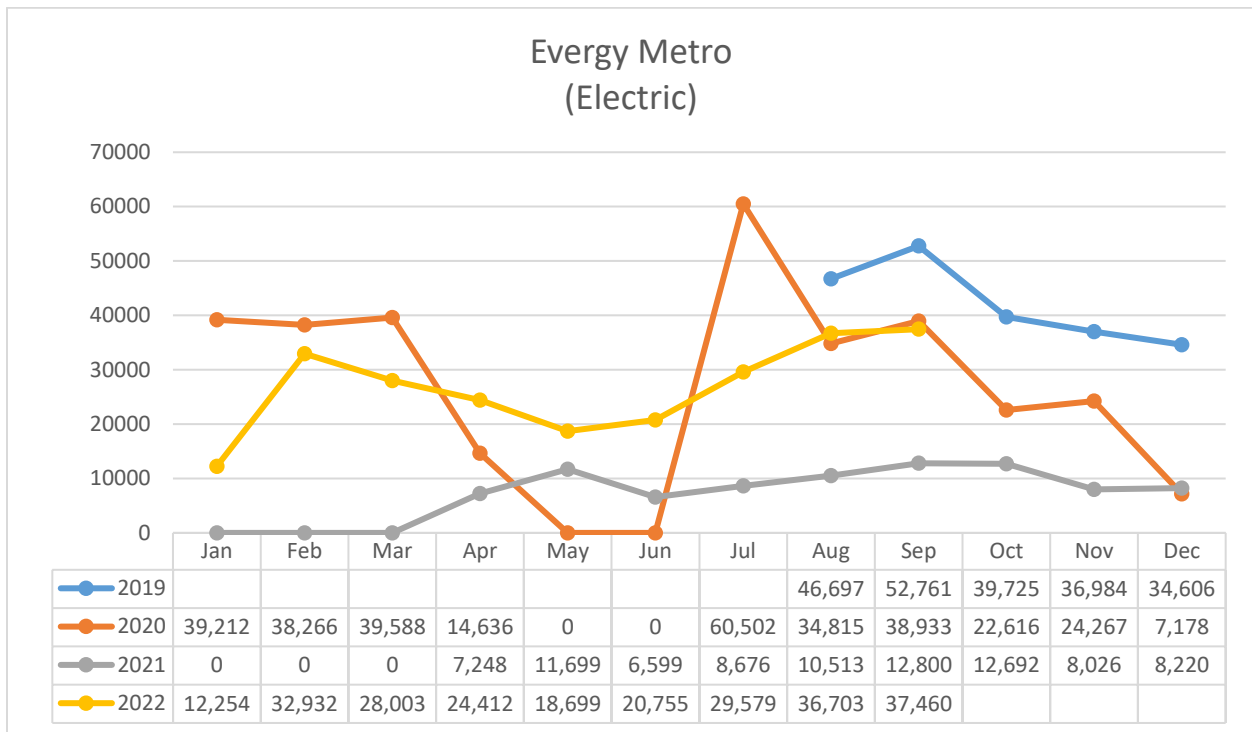
As shown in the previous graph, Evergny Metro performed approximately 61% more disconnections for non-payment in July 2022 versus July 2021, 85% more in August 2022 versus August 2021, and 9% more in September 2022 versus September 2021. There were 37% fewer disconnections for non-payment in July 2022 compared to June 2022, 104% more in August 2022 compared to July 2022, and 12% fewer in September 2022 compared to August 2022. The number of actual disconnections by Evergny Metro in July 2022 was about 49% below the amount projected by Evergny Metro for the same month, 11% below in August 2022, and 14% below in September 2022.

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



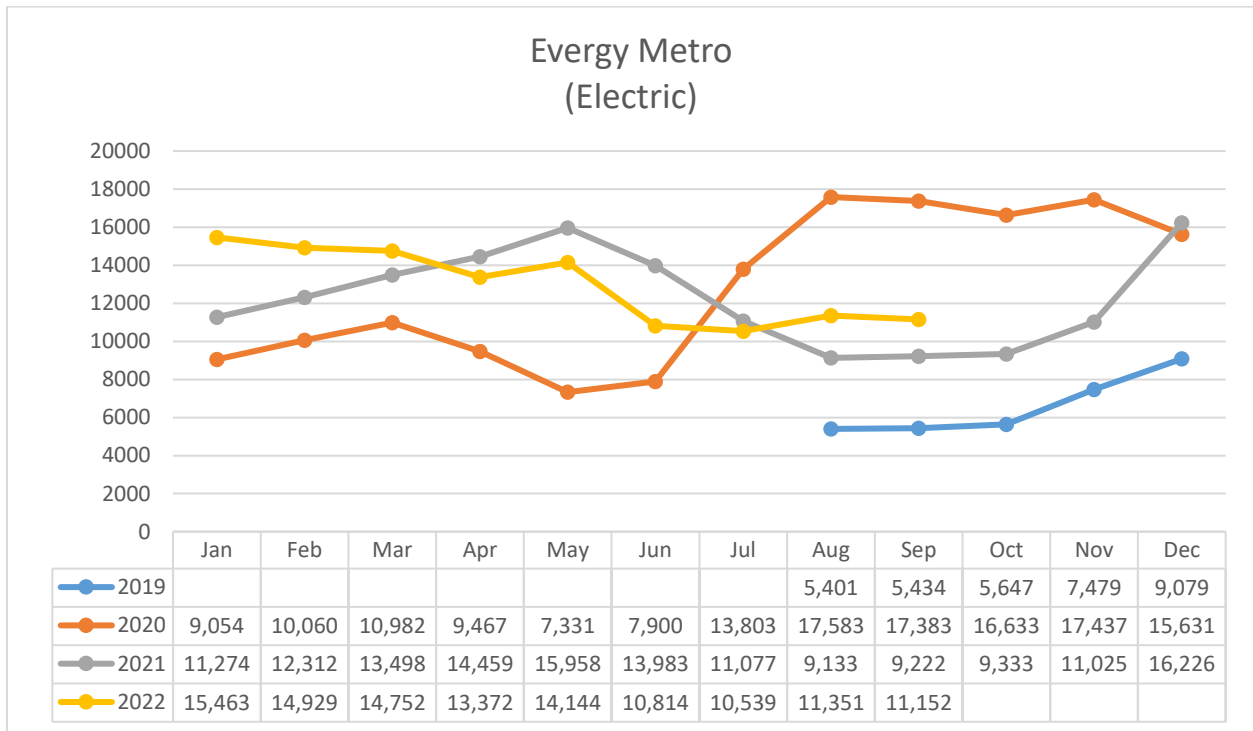
The previous data indicates that there were 8% fewer Evergy Metro customers with past-due accounts in July 2022 versus July 2021, 16% fewer in August 2022 versus August 2021, and 23% fewer in September 2022 versus September 2021. There were 1% more customers with past-due accounts in July 2022 compared to June 2022, 6% fewer in August 2022 compared to July 2022, and 3% more in September 2022 compared to August 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 241% more customers who were not disconnected in July 2022 versus July 2021, 249% more in August 2022 versus August 2021, and 193% more in September 2022 versus September 2021. There were approximately 43% more customers who received a final disconnection notice in July 2022 compared to June 2022, 24% more in August 2022 compared to July 2022, and 2% more in September 2022 compared to August 2022.

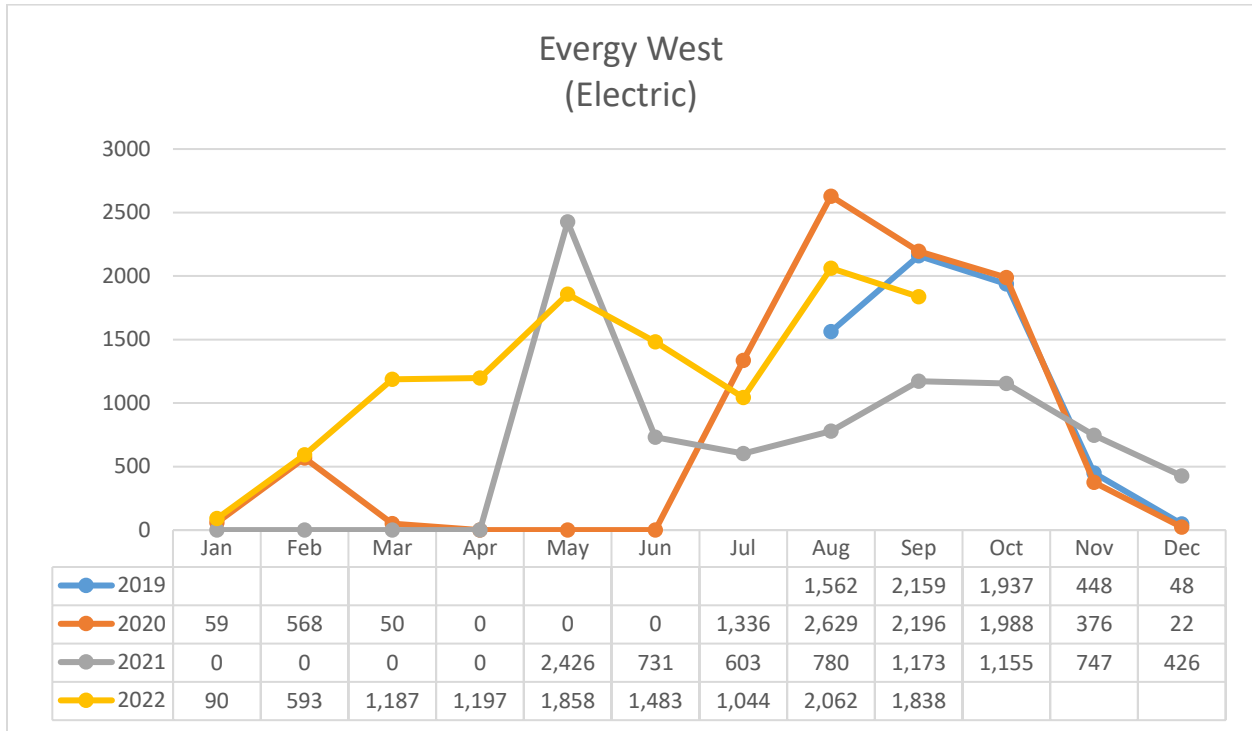
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 5% fewer Evergy Metro customers who participated in payment plans in July 2022 versus July 2021, 24% more in August 2022 versus August 2021, and 21% more in September 2022 versus September 2021. There were approximately 3% fewer customers who participated in payment plans in July 2022 compared to June 2022, 8% more in August 2022 compared to July 2022, and 2% fewer in September 2022 compared to August 2022.

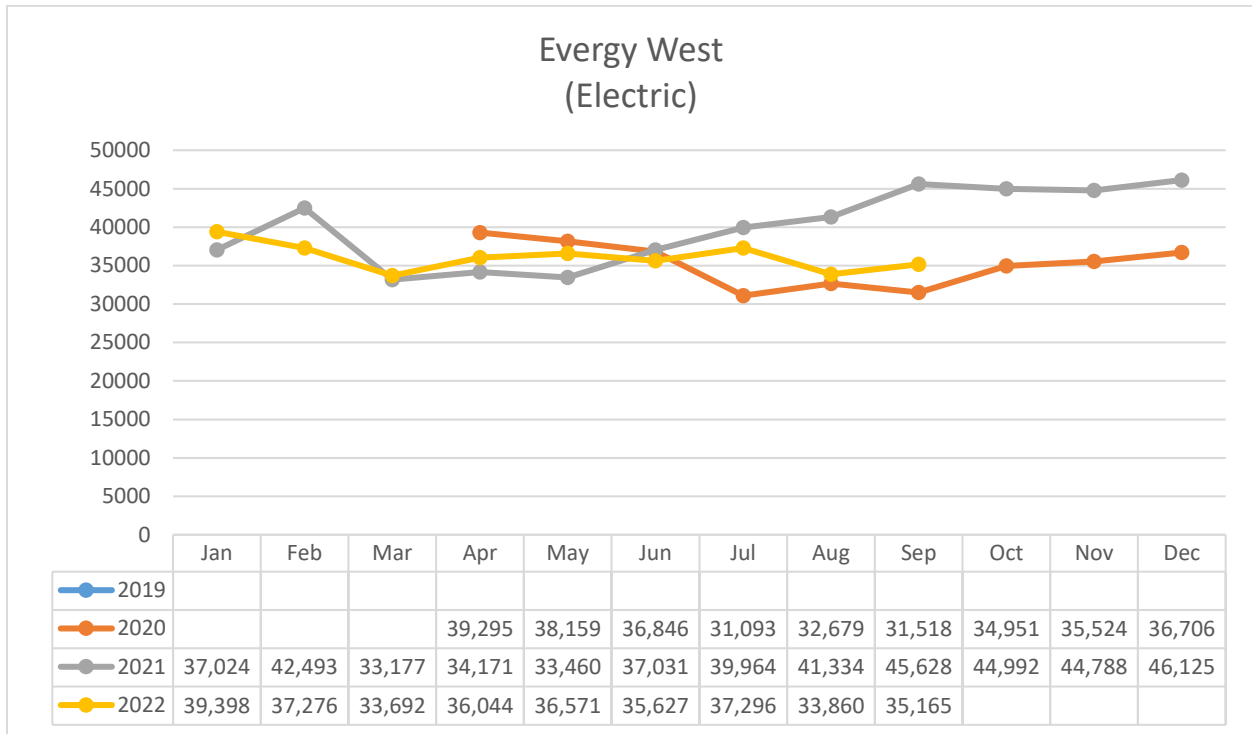
Question 1 (Every West – Electric)

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



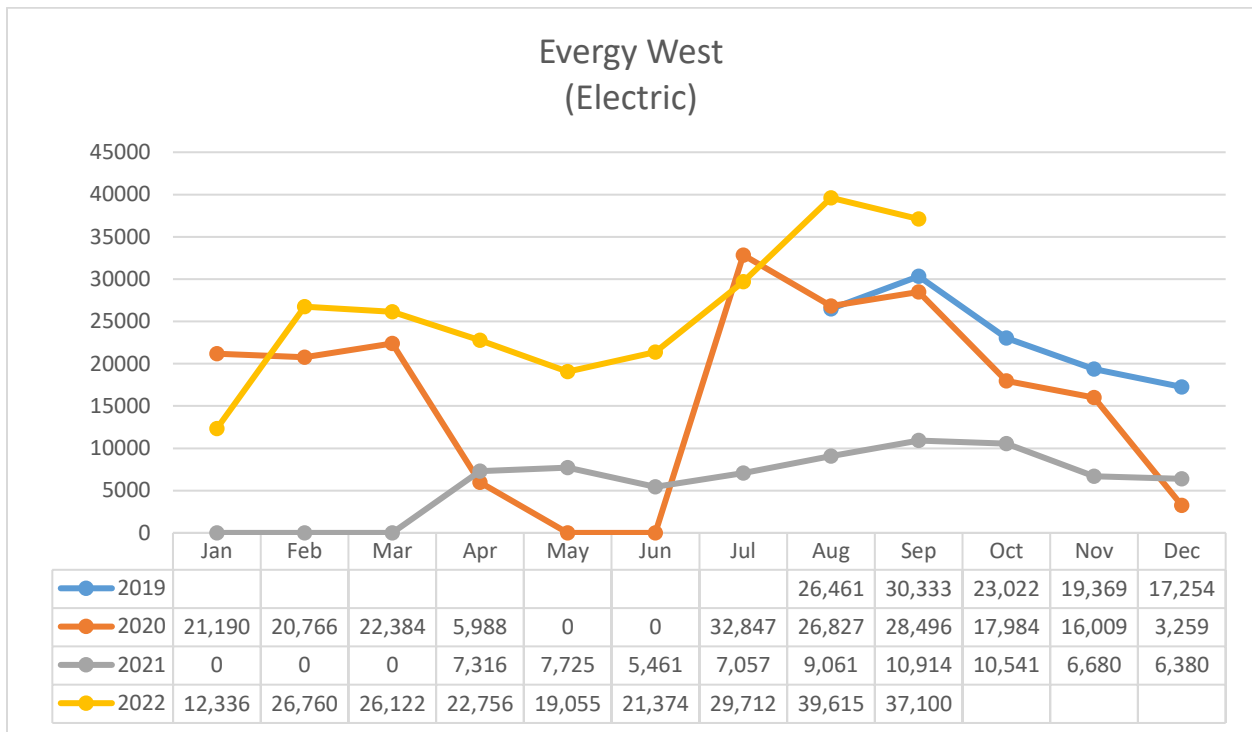
As shown in the previous graph, Every West performed 73% more disconnections for non-payment in July 2022 versus July 2021, 164% more in August 2022 versus August 2021, and 57% more in September 2022 versus September 2021. There were approximately 30% fewer disconnection for non-payment in July 2022 compared to June 2022, 98% more in August 2022 compared to July 2022, and 11% fewer in September 2022 compared to August 2022. The number of actual disconnections by Every West in July 2022 was 30% below the amount projected by Every West for the same month, 14% below in August 2022, and 12% below in September 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”



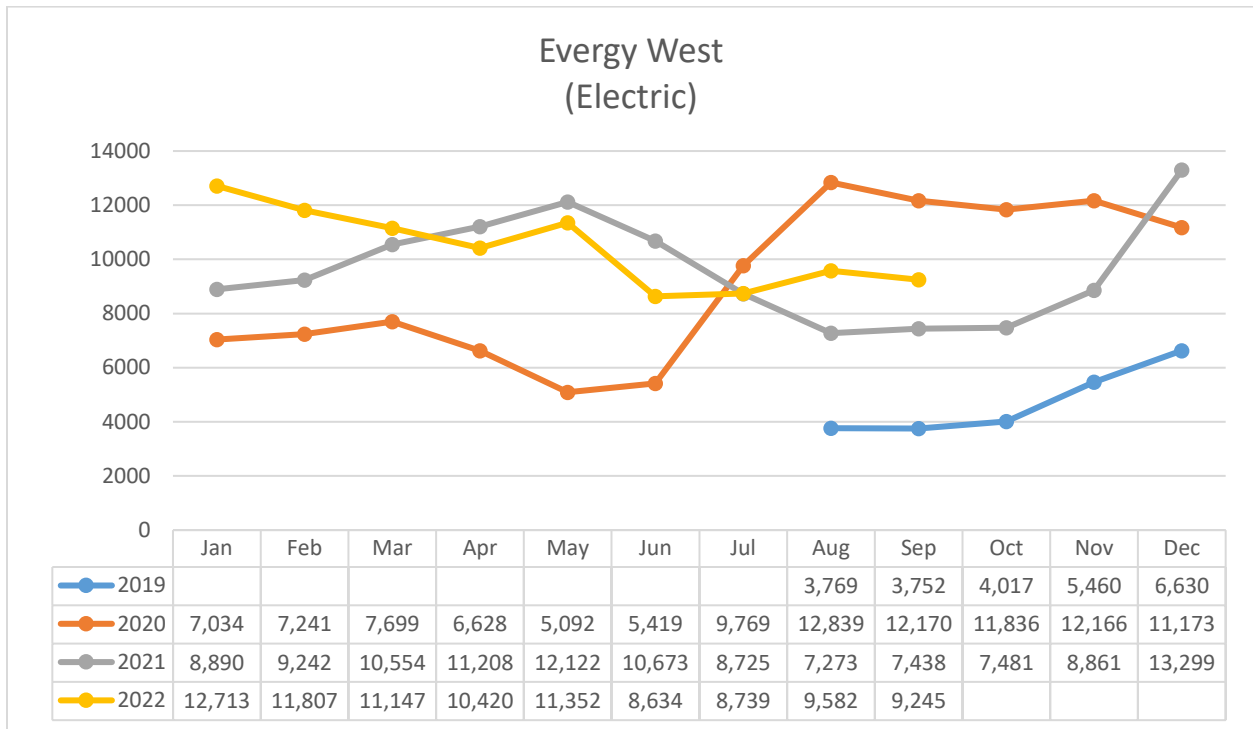
The previous data indicates that there were 7% fewer Evergy West customers with past-due accounts in July 2022 versus July 2021, 18% fewer in August 2022 versus August 2021, and 23% fewer in September 2022 versus September 2021. There were approximately 5% more customers with past-due accounts in July 2022 compared to June 2022, 9% fewer in August 2022 compared to July 2022, and 4% more in September 2022 compared to August 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 Energy West’s data, for those customers who received a final disconnection notice, there were approximately 321% more customers who were not disconnected in July 2022 versus July 2021, 337% more in August 2022 versus August 2021, and 240% more in September 2022 versus September 2021. There were 39% more customers who received a final disconnection notice in July 2022 compared to June 2022, 33% more in August 2022 compared to July 2022, and 6% fewer in September 2022 compared to August 2022.

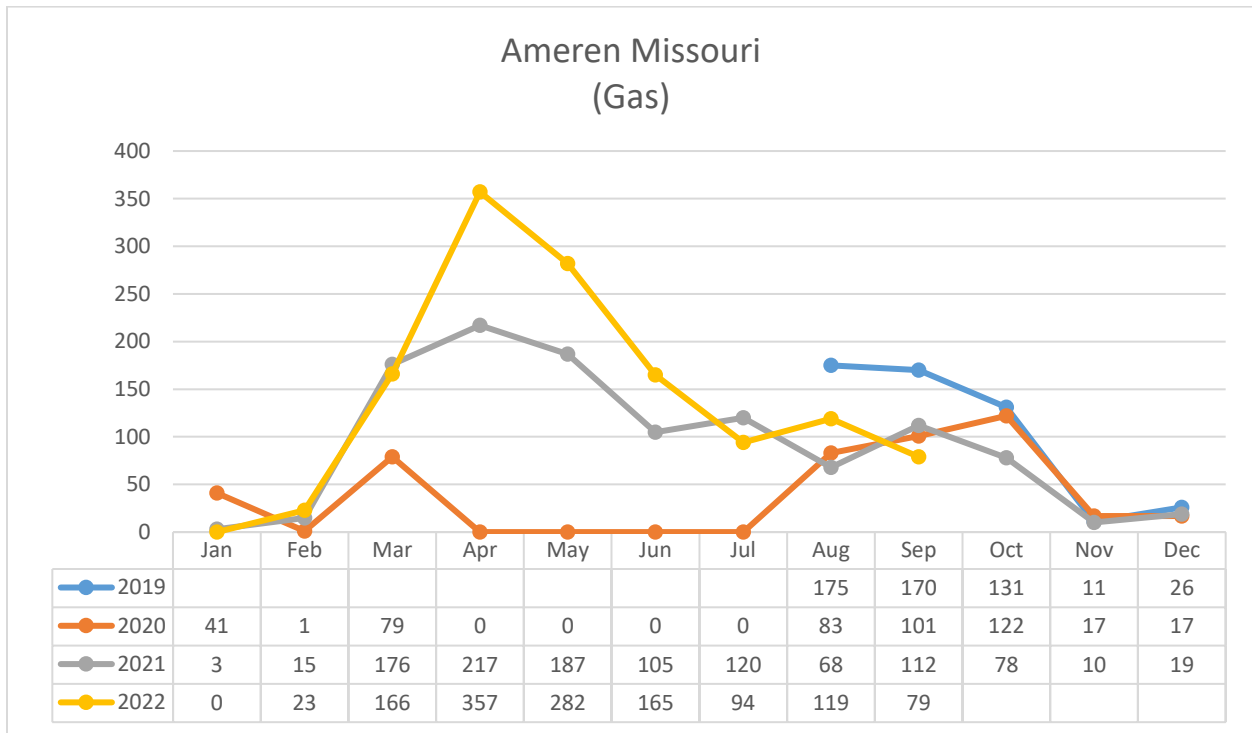
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there was less than 1% more Evergy West customers who participated in payment plans in July 2022 versus July 2021, 32% more in August 2022 versus August 2021, and 24% more in September 2022 versus September 2021. There were approximately 1% more customers who participated in payment plans in July 2022 compared to June 2022, 10% more in August 2022 compared to July 2022, and 4% fewer in September 2022 compared to August 2022.

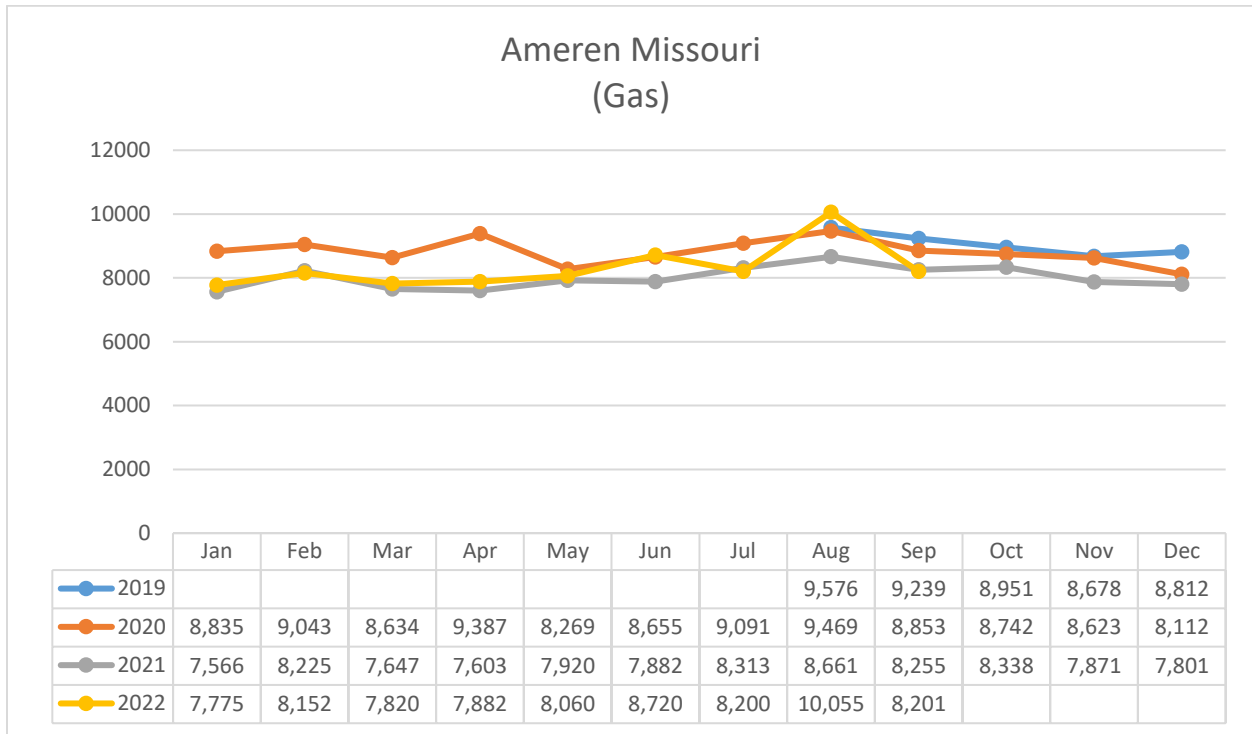
Question 1 (Ameren Missouri – Gas)

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



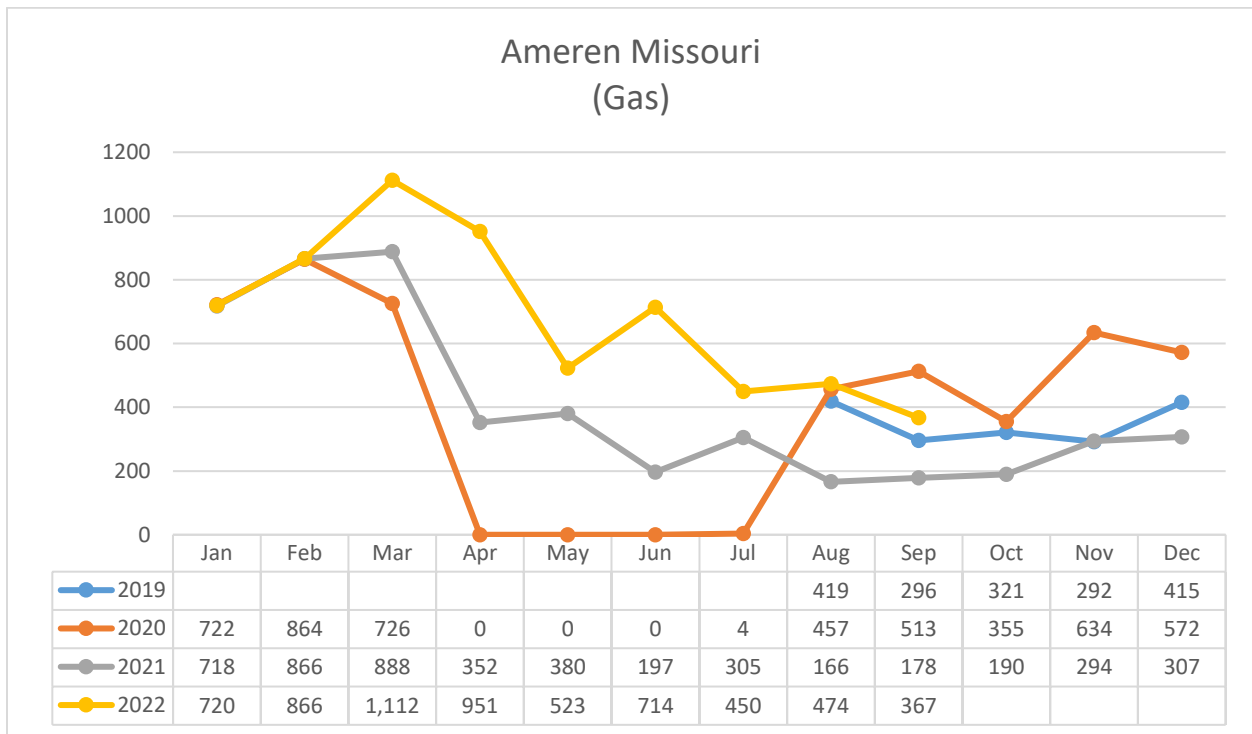
As shown in the previous graph, Ameren Missouri performed 22% fewer disconnections for non-payment in July 2022 versus July 2021, 75% more in August 2022 versus August 2021, and 29% fewer in September 2022 versus September 2021. There were 43% fewer disconnections for non-payment in July 2022 compared to June 2022, 27% more in August 2022 compared to July 2022, and 34% fewer in September 2022 compared to August 2022. The number of actual disconnections by Ameren Missouri in July 2022 was 51% below the projected number for the same month, 36% below in August 2022, and 44% below in September 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”



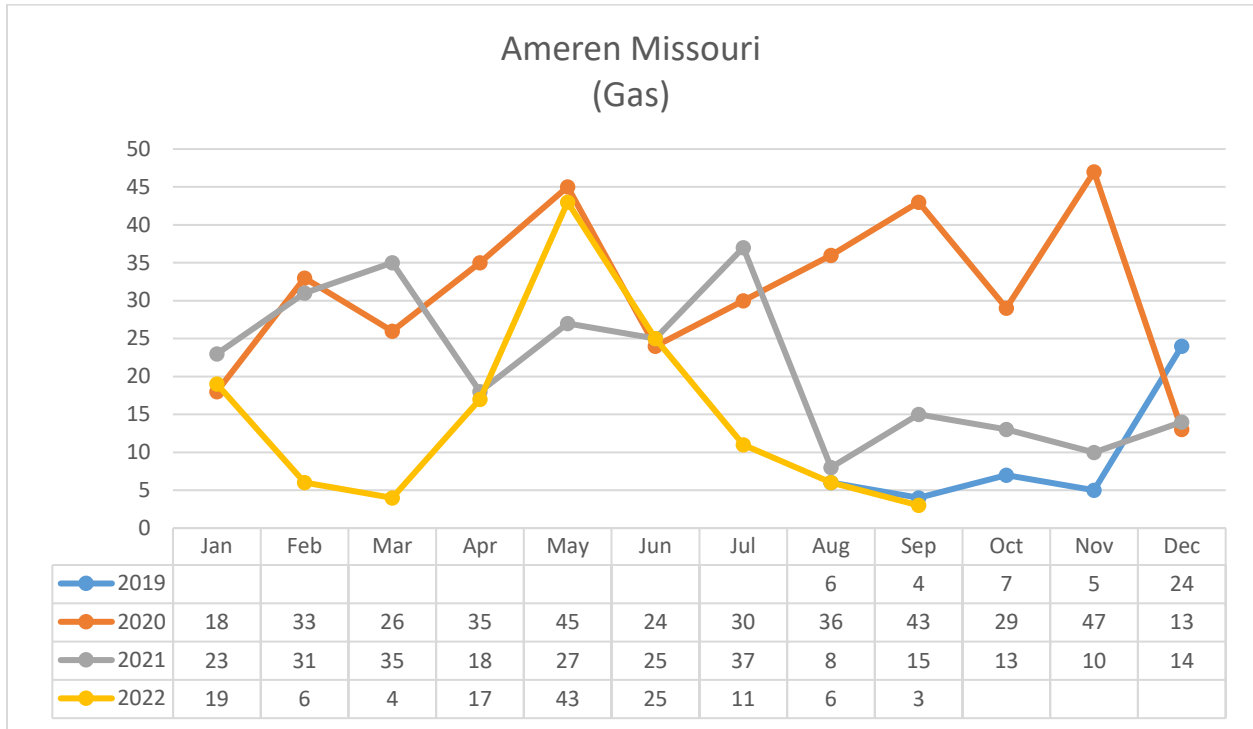
The previous data indicates that there were approximately 1% fewer Ameren Missouri customers with past-due accounts in July 2022 versus July 2021, 16% more in August 2022 versus August 2021, and 1% fewer in September 2022 versus September 2021. There were approximately 6% fewer customers with past-due accounts in July 2022 compared to June 2022, 23% more in August 2022 compared to July 2022, and 18% fewer in September 2022 compared to August 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 48% more customers who were not disconnected in July 2022 versus July 2021, 186% more customers who were not disconnected in August 2022 versus August 2021, and 106% more in September 2022 versus September 2021. There were approximately 37% fewer in July 2022 compared to June 2022, 5% more customers who received a final disconnection notice in August 2022 compared to July 2022, and 23% fewer in September 2022 compared to August 2022.

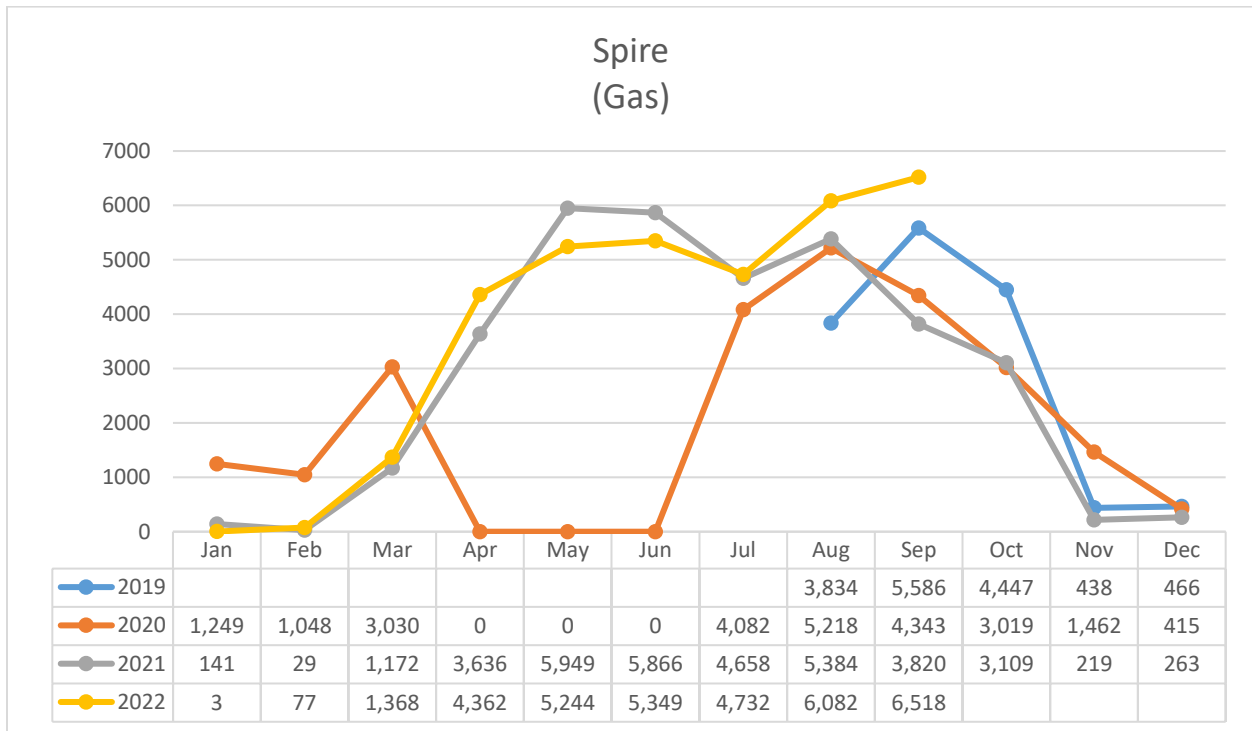
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there was 70% fewer Ameren Missouri customers who participated in payment plans in July 2022 versus July 2021, 25% fewer in August 2022 versus August 2021, and 80% fewer in September 2022 versus September 2021. There were 56% fewer customers participating in July 2022 compared to June 2022, 5 fewer in August 2022 compared to July 2022, and 3 fewer in September 2022 compared to August 2022.

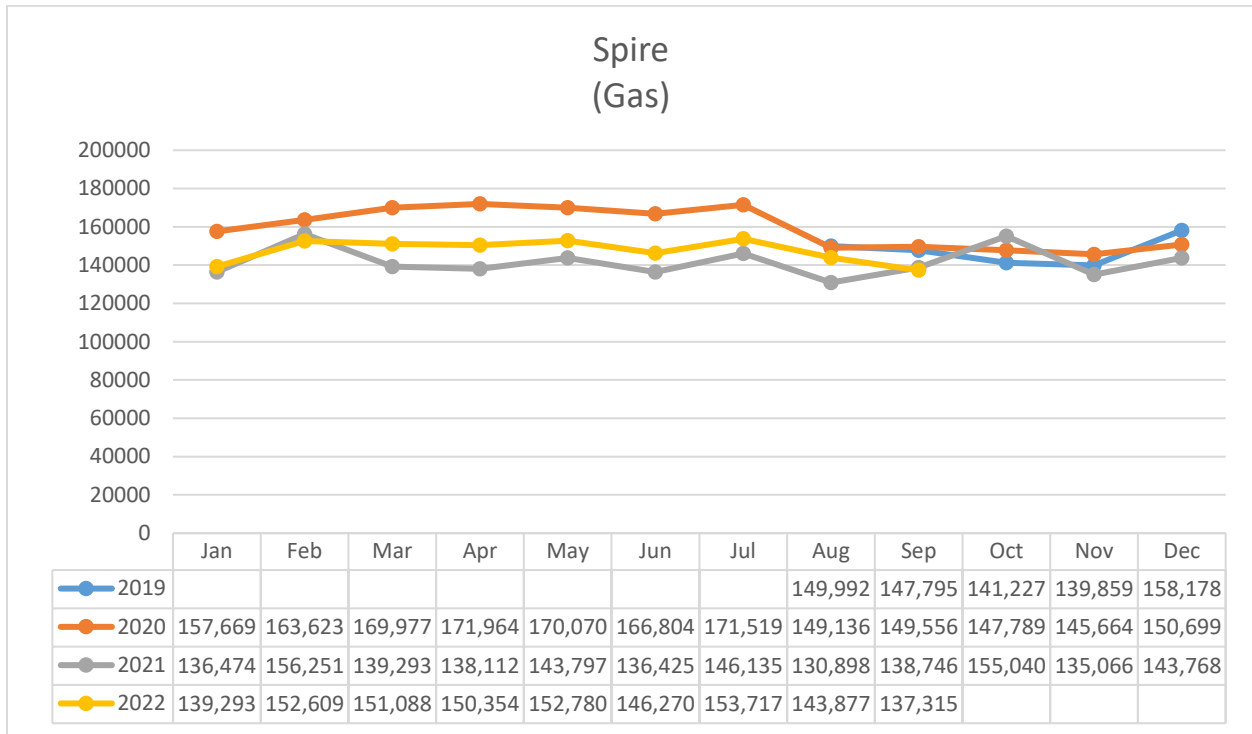
Question 1 (Spire - Gas)

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



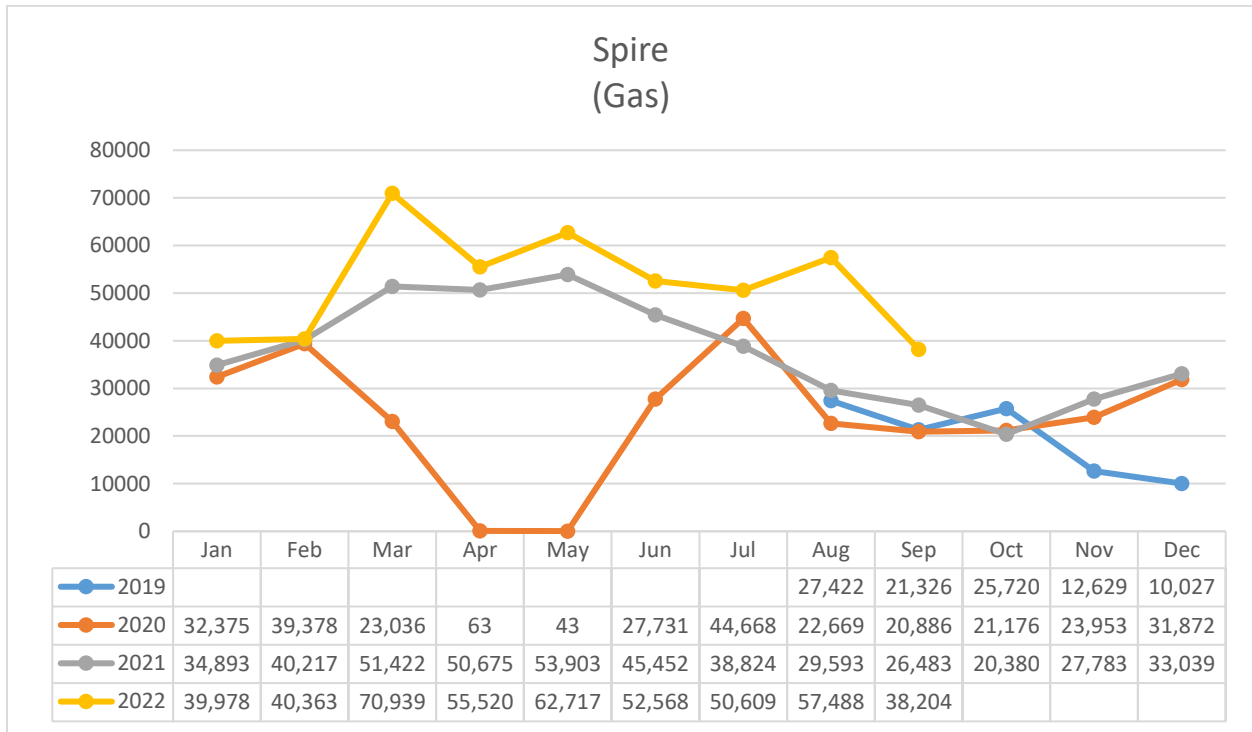
As shown in the previous graph, Spire performed approximately 2% more disconnections for non-payment in July 2022 versus July 2021, 13% more in August 2022 versus August 2021, and 71% more in September 2022 versus September 2021. There were 12% fewer disconnections for non-payment in July 2022 compared to June 2022, 29% more in August 2022 compared to July 2022, and 7% more in September 2022 compared to August 2022. The actual number of disconnections for July 2022 was 44% below the projected number of disconnections for the same month, 7% above for August 2022 and 36% above for September 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”



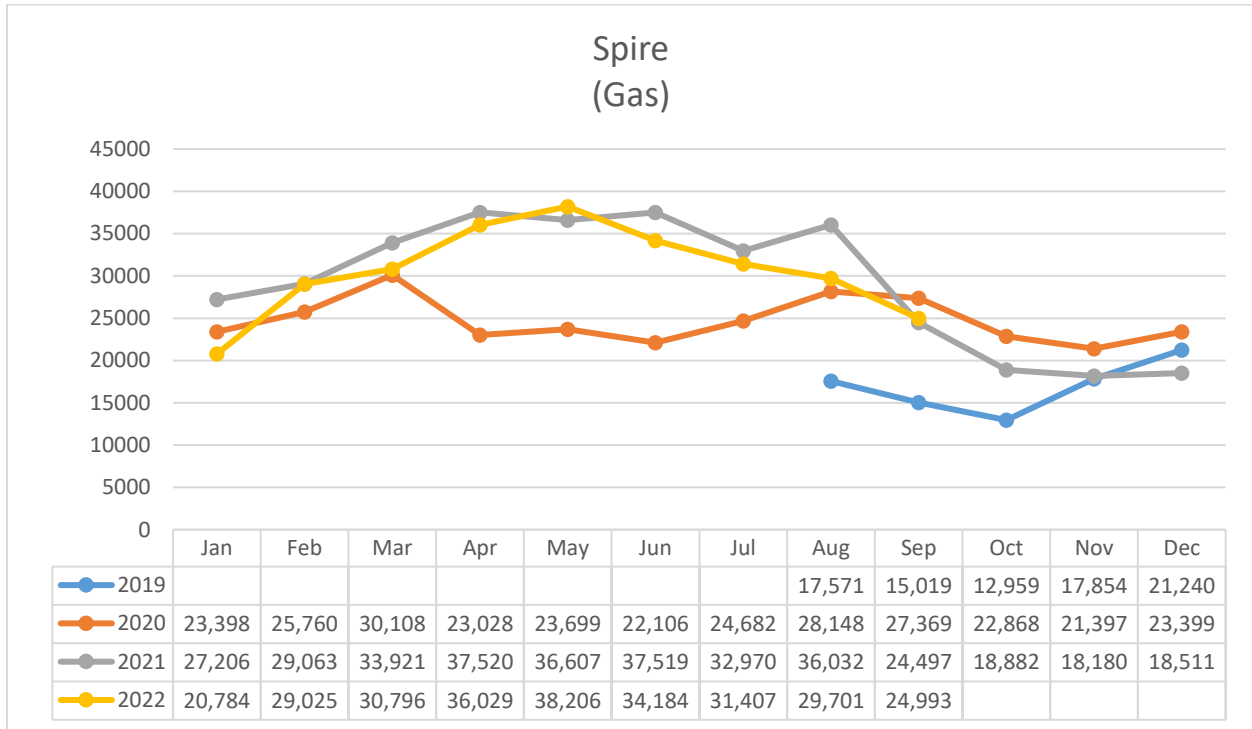
The previous data indicates that there were about 5% more Spire customers with past-due accounts in July 2022 versus July 2021, 10% more in August 2022 versus August 2021, and 1% fewer in September 2022 versus September 2021. There were about 5% more customers with past-due accounts in July 2022 compared to June 2022, 6% fewer in August 2022 compared to July 2022, and 5% fewer in September 2022 compared to August 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 30% more customers who were not disconnected in July 2022 versus July 2021, 94% more in August 2022 versus August 2021, and 44% more in September 2022 versus September 2021. There were 4% fewer customers who received a final disconnection notice in July 2022 compared to June 2022, 14% more in August 2022 compared to July 2022, and 34% fewer in September 2022 compared to August 2021.

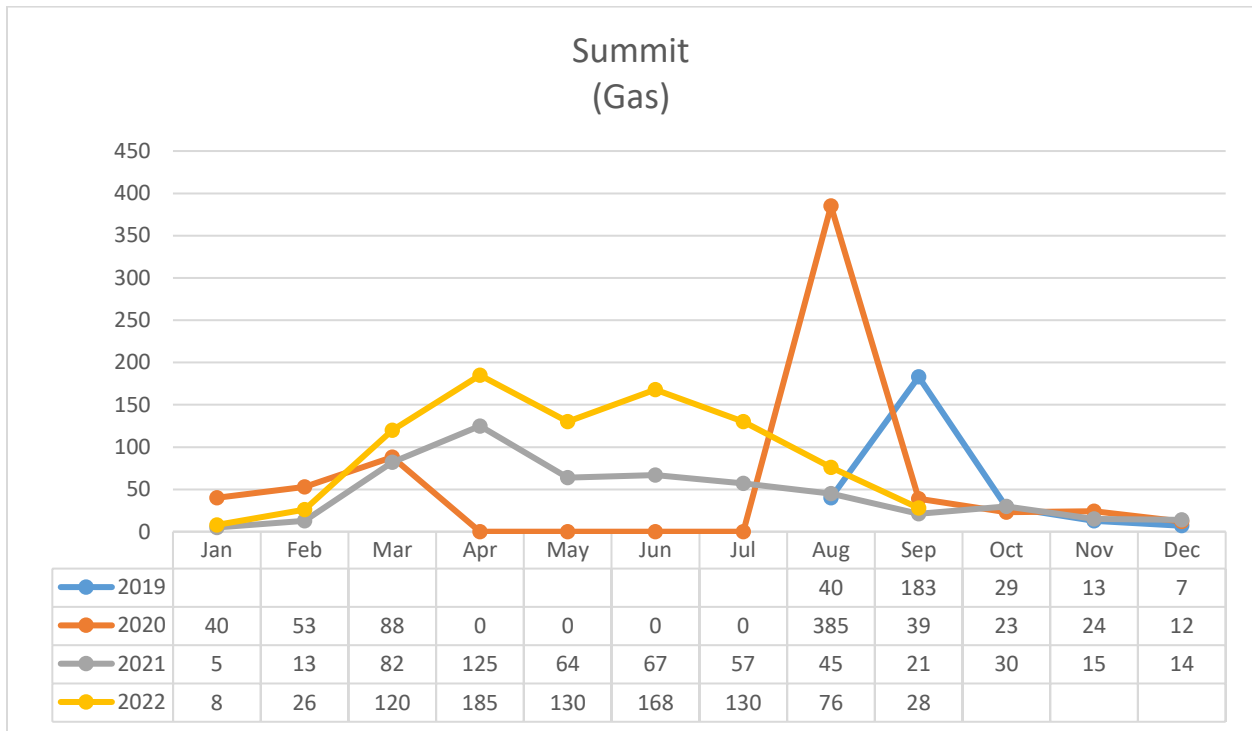
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were 5% fewer Spire customers who participated in payment plans in July 2022 versus July 2021, 18% fewer in August 2022 versus August 2021, and 2% more in September 2022 versus September 2021. There were approximately 8% fewer customers who participated in payment plans in July 2022 compared to June 2022, 5% fewer in August 2022 compared to July 2022, and 16% fewer in September 2022 compared to August 2022.

Question 1 (Summit - Gas)⁵

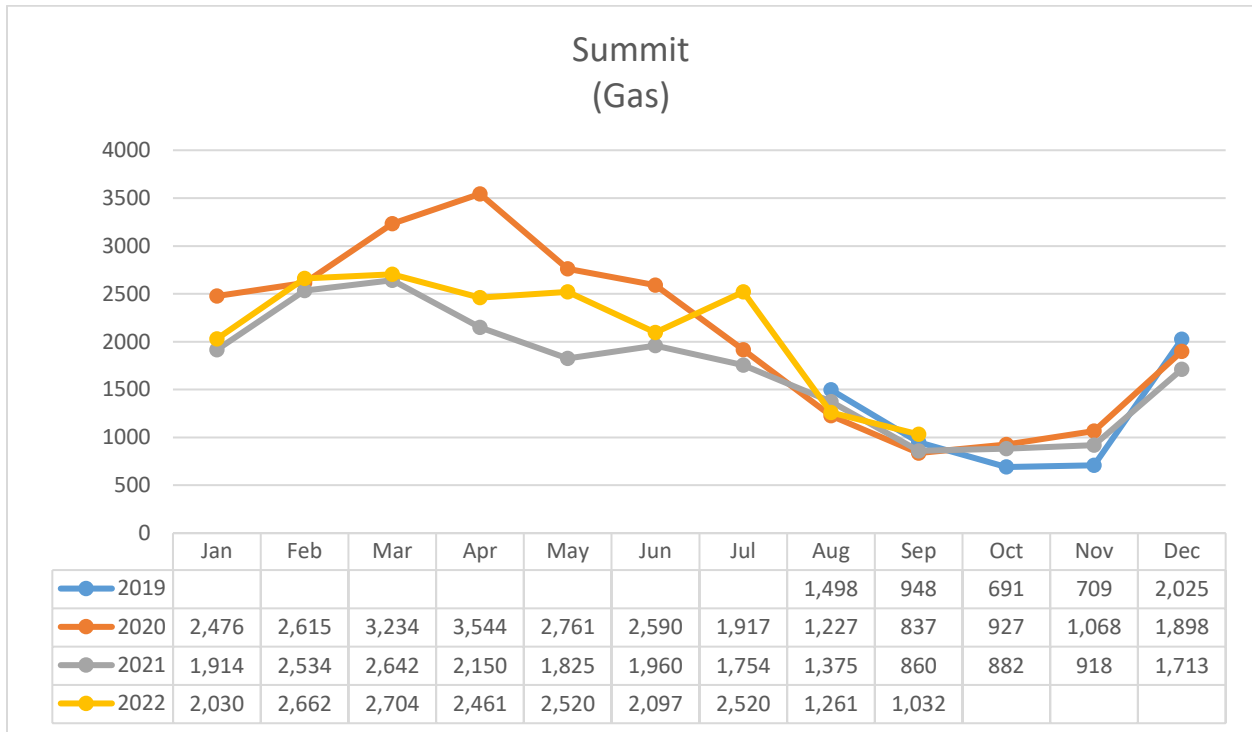
a) The number of disconnections for non-payment of services as of each month-end



As shown in the previous graph, Summit performed 128% more disconnections for non-payment in July 2022 versus July 2021, 69% more in August 2022 versus August 2021, and 33% more in September 2022 versus September 2021. There were 23% fewer disconnections in July 2022 compared to June 2022, 42% fewer in August 2022 compared to July 2022, and 63% fewer in September 2022 compared to August 2022. The number of actual disconnections by Summit in July 2022 was 69% above the amount projected by Summit for the same month, 81% above in August 2022, and 17% above in September 2022.

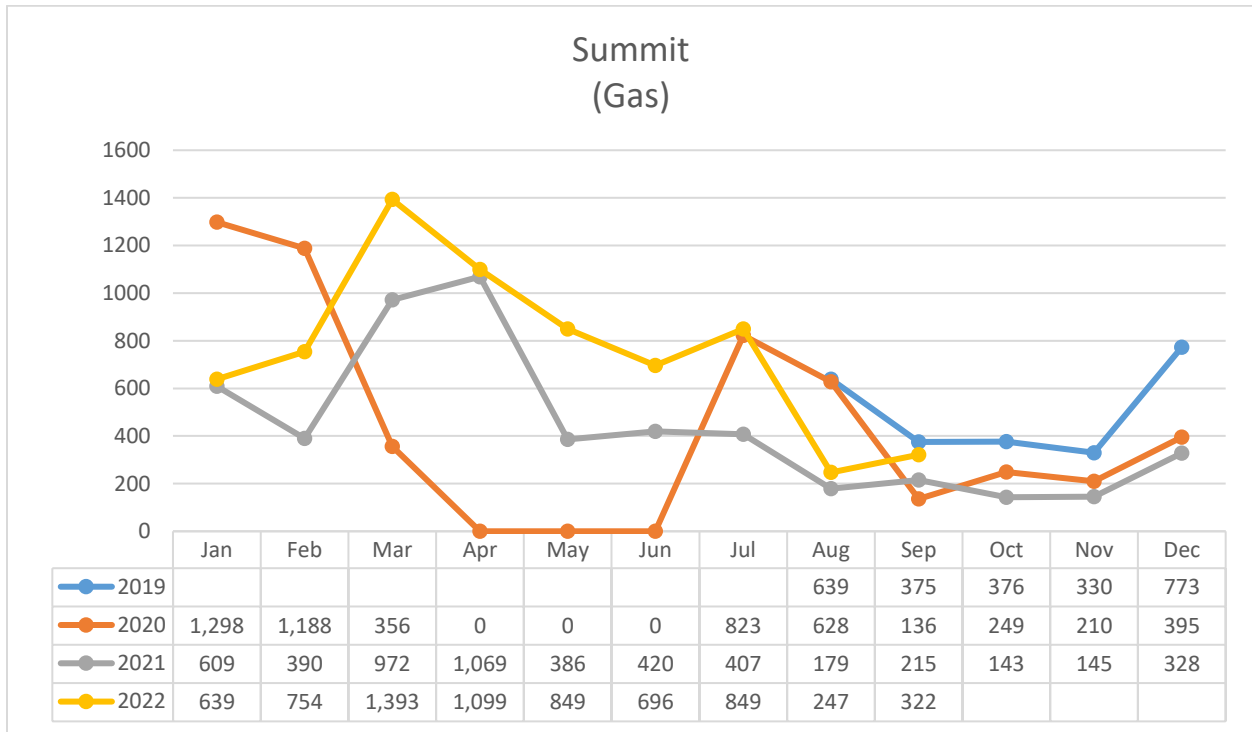
⁵ Revised Data Request Response No. 0007.1 stated a discrepancy was identified in the numbers reported for sections 1(a),1(b),1(c), and 1(d). Data would sometimes fluctuate from a previous response in subsequent months. Data variations include information updated to utilize dates of resolutions, customers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



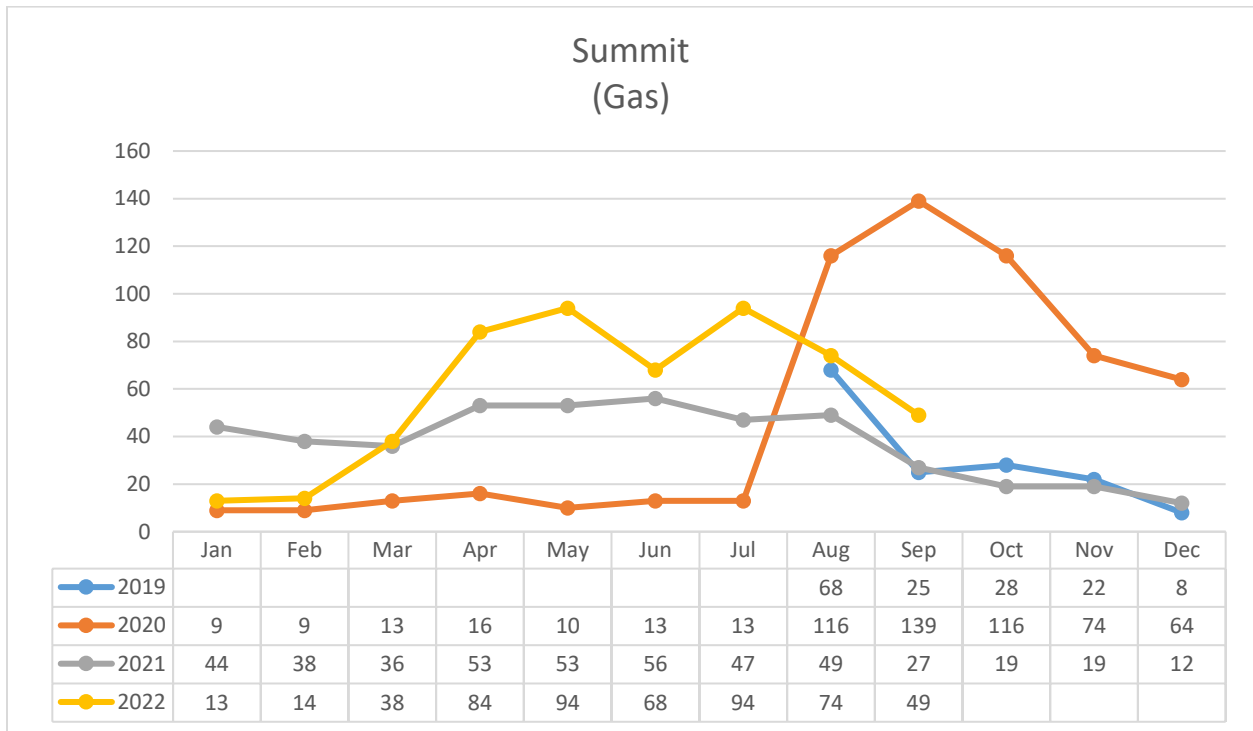
The previous data indicates that there were about 44% more Summit customers with past-due accounts in July 2022 versus July 2021, 8% fewer in August 2022 versus August 2021, and 20% more in September 2022 versus September 2021. There were 20% more customers with past-due accounts in July 2022 compared to June 2022, 50% fewer in August 2022 compared to July 2022, and 18% fewer in September 2022 compared to August 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 109% more customers who were not disconnected in July 2022 versus July 2021, 38% more in August 2022 versus August 2021, and 50% more in September 2022 versus September 2021. There were approximately 22% more customers who received a final disconnection notice in July 2022 compared to June 2022, 71% fewer in August 2022 compared to July 2022, and 30% more in September 2022 compared to August 2022.

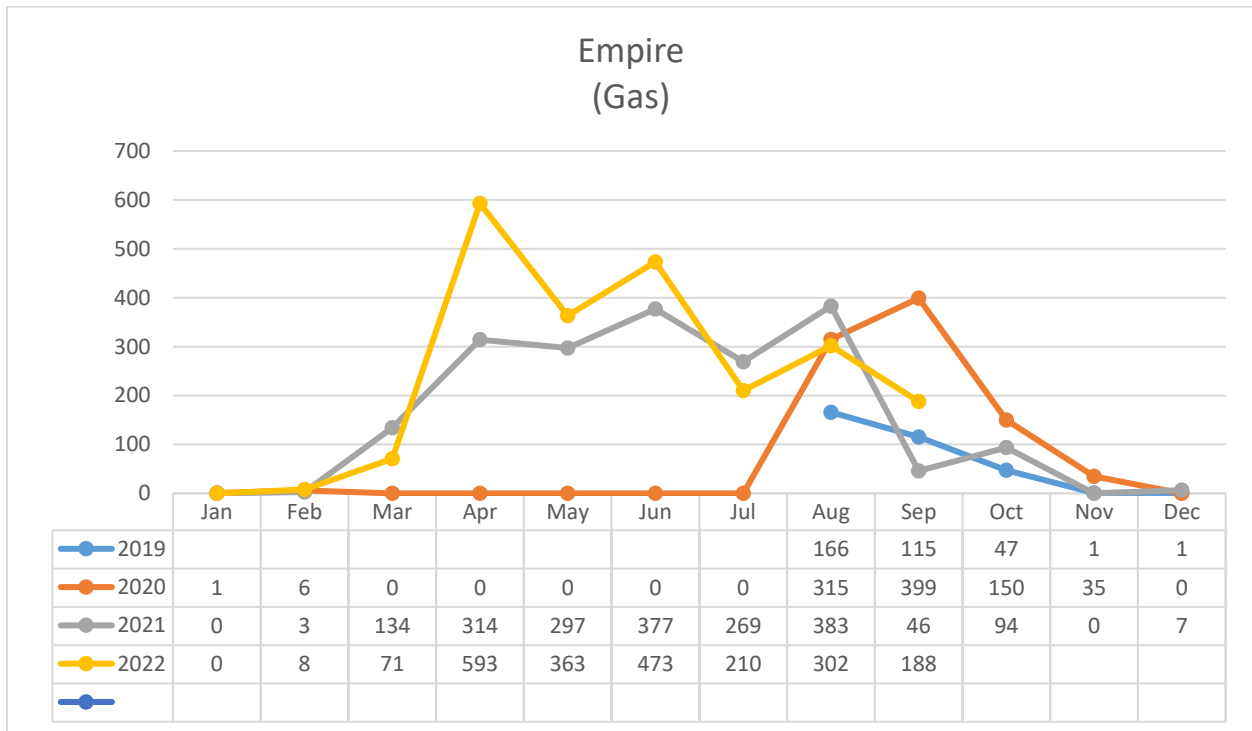
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 100% more Summit customers who participated in payment plans in July 2022 versus July 2021, 51% more in August 2022 versus August 2021, and 81% more in September 2022 versus September 2021. There were 38% more customers who participated in payment plans in July 2022 compared to June 2022, 21% fewer in August 2022 compared to July 2022, and 34% fewer in September 2022 compared to August 2022.

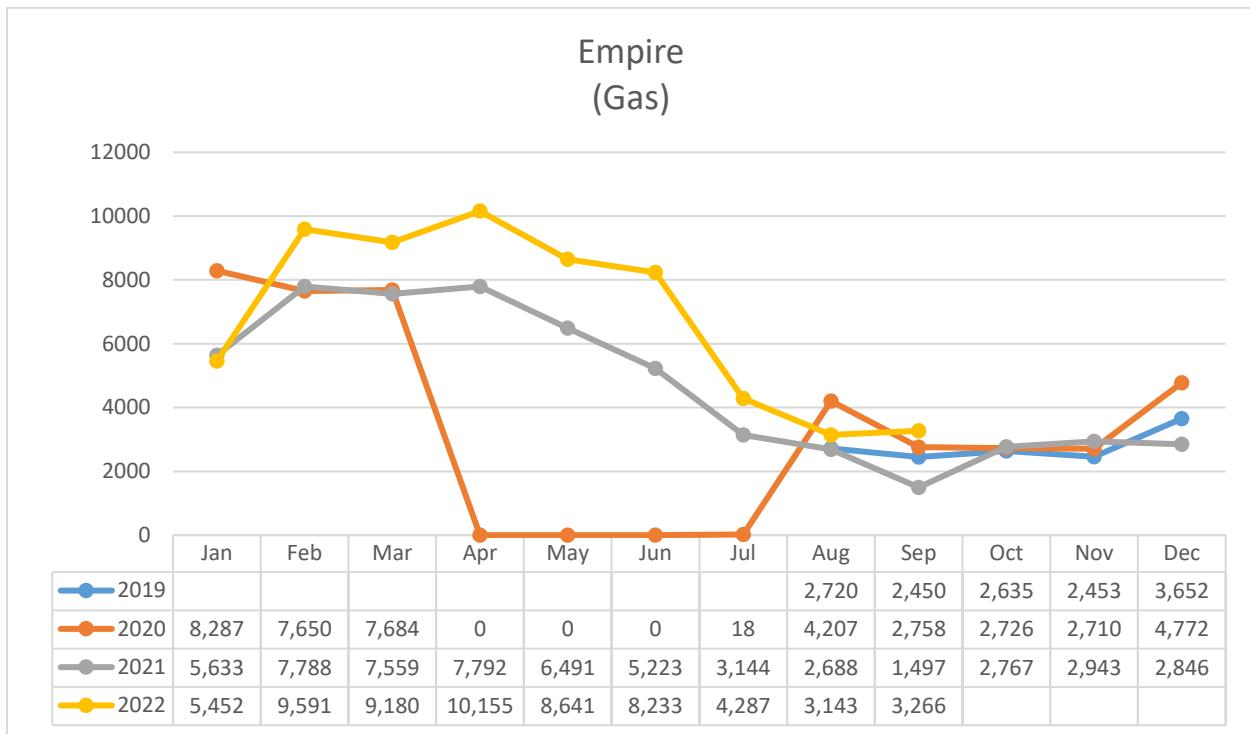
Question 1 (Empire - Gas)

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



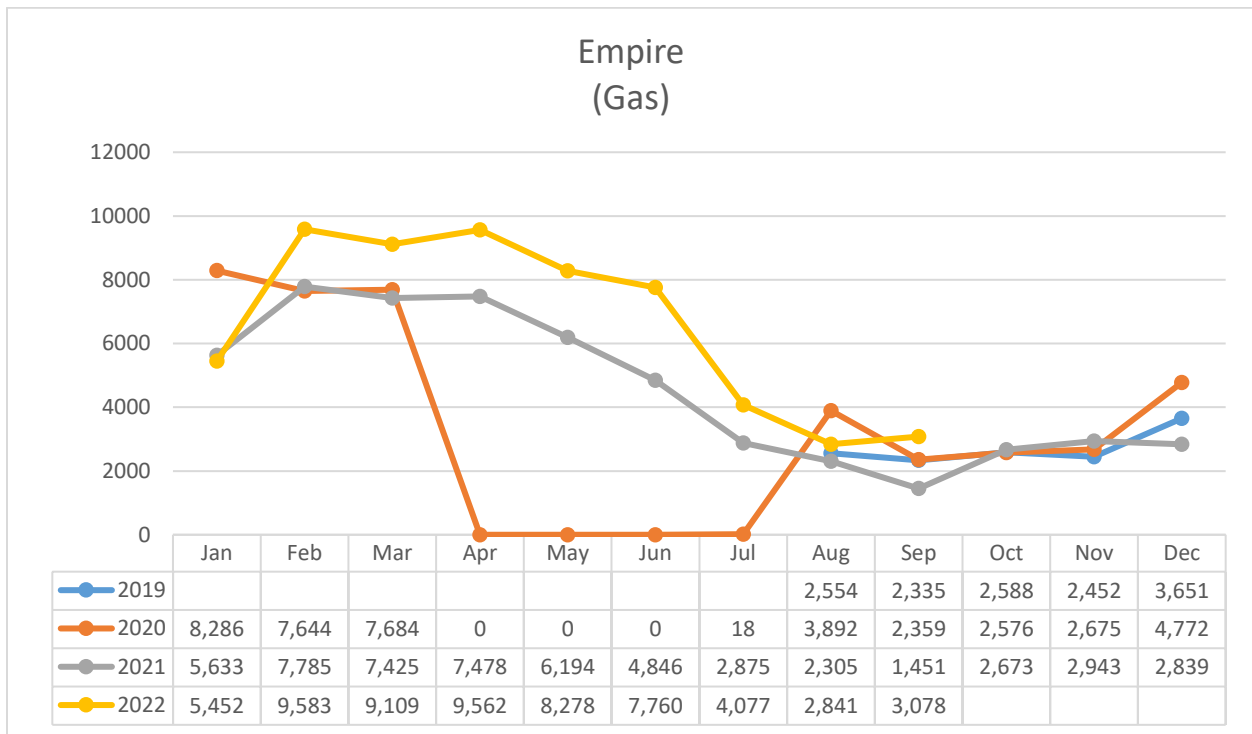
As shown in the previous graph, Empire performed 22% fewer disconnections for non-payment in July 2022 versus July 2021, 21% fewer in August 2022 versus August 2021, and 309% more in September 2022 versus September 2021. There were 56% fewer disconnections for non-payment in July 2022 compared to June 2022, 44% more in August 2022 compared to July 2022, and 38% fewer in September 2022 compared to August 2022. The projected number of disconnections by Empire for July 2022 was 11% below the projected number of disconnections for the same month, 13% below for August 2022, and 104% above for September 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”



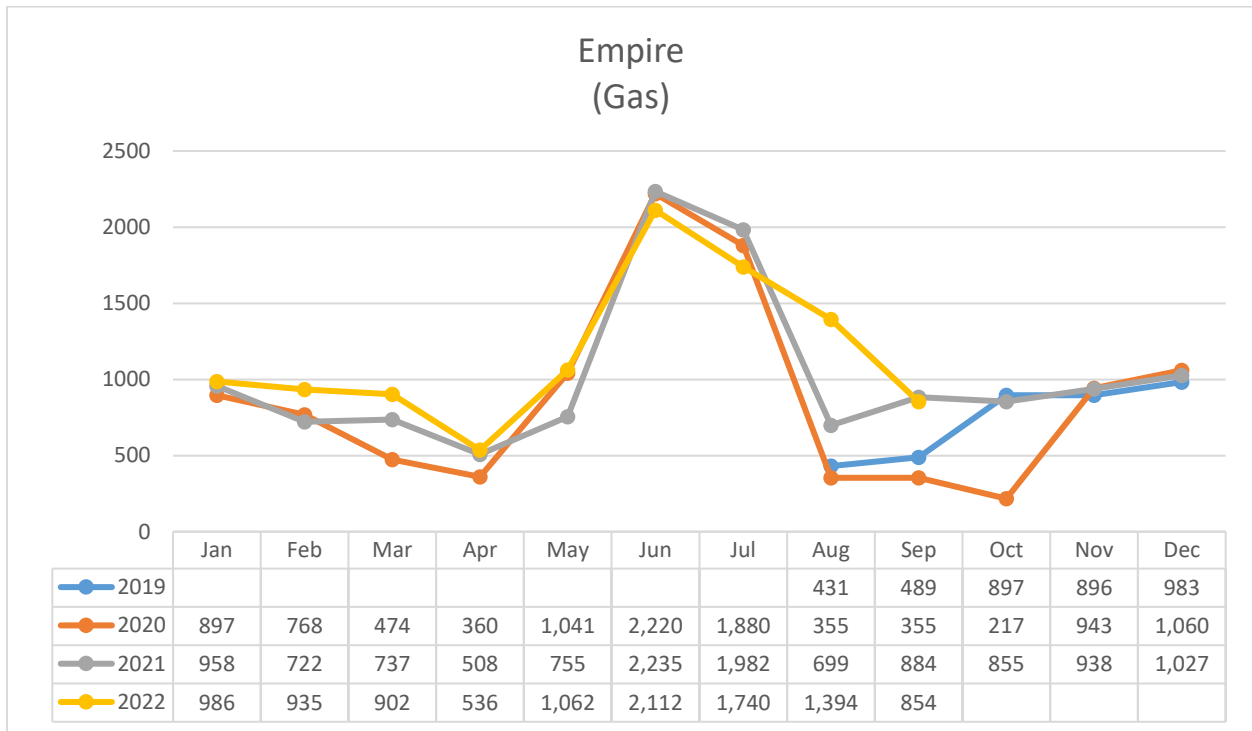
The previous data indicates that there were approximately 36% more Empire customers with past-due accounts in July 2022 versus July 2021, 17% more in August 2022 versus August 2021, and 118% more in September 2022 versus September 2021. There were 48% fewer customers with past-due accounts in July 2022 compared to June 2022, 27% fewer in August 2022 compared to July 2022, and 4% more in September 2022 compared to August 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 42% more customers who were not disconnected in July 2022 versus July 2021, 23% more in August 2022 versus August 2021, and 112% more in September 2022 versus September 2021. There were 47% fewer customers who received a final disconnection notice in July 2022 compared to June 2022, 30% fewer in August 2022 compared to July 2022, and 8% more in September compared to August 2022.

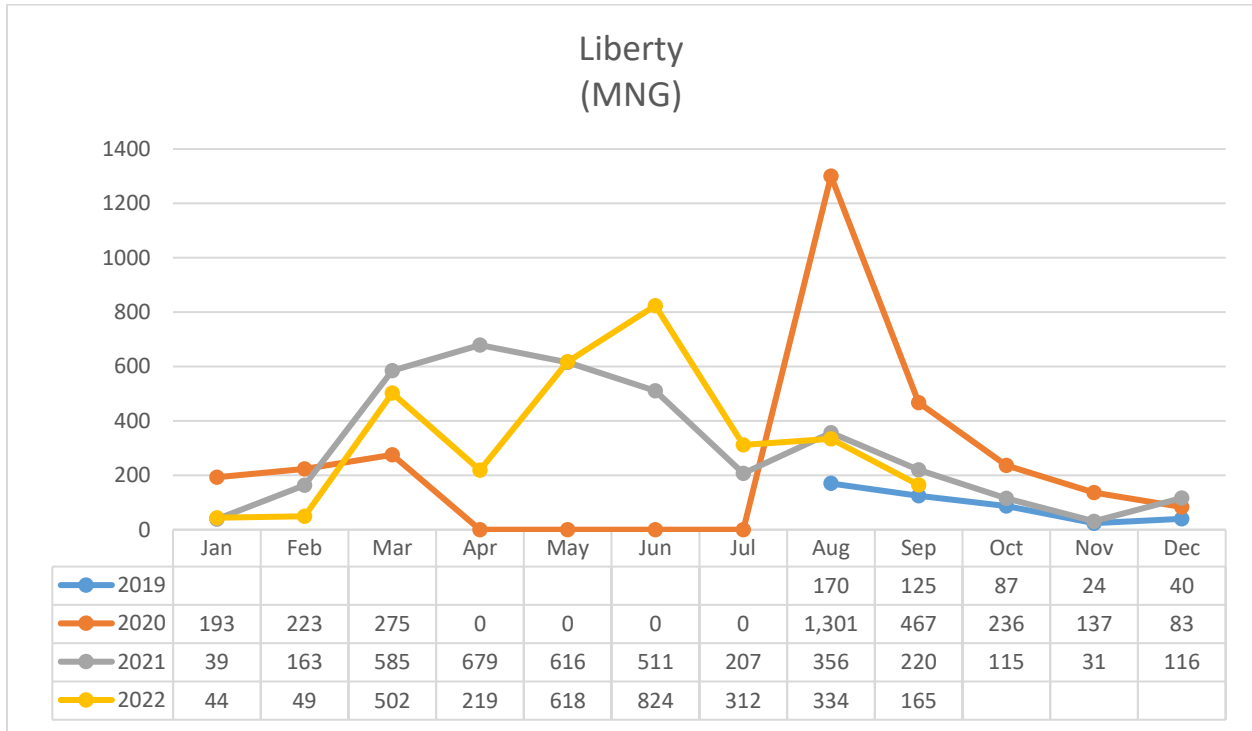
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were 12% fewer Empire customers who participated in payment plans in July 2022 versus July 2021, 99% more in August 2022 versus August 2021, and 3% fewer in September 2022 versus September 2021. There were about 18% fewer customers who participated in payment plans in July 2022 compared to June 2022, 20% fewer in August 2022 compared to July 2022, and 39% fewer in September 2022 compared to August 2022.

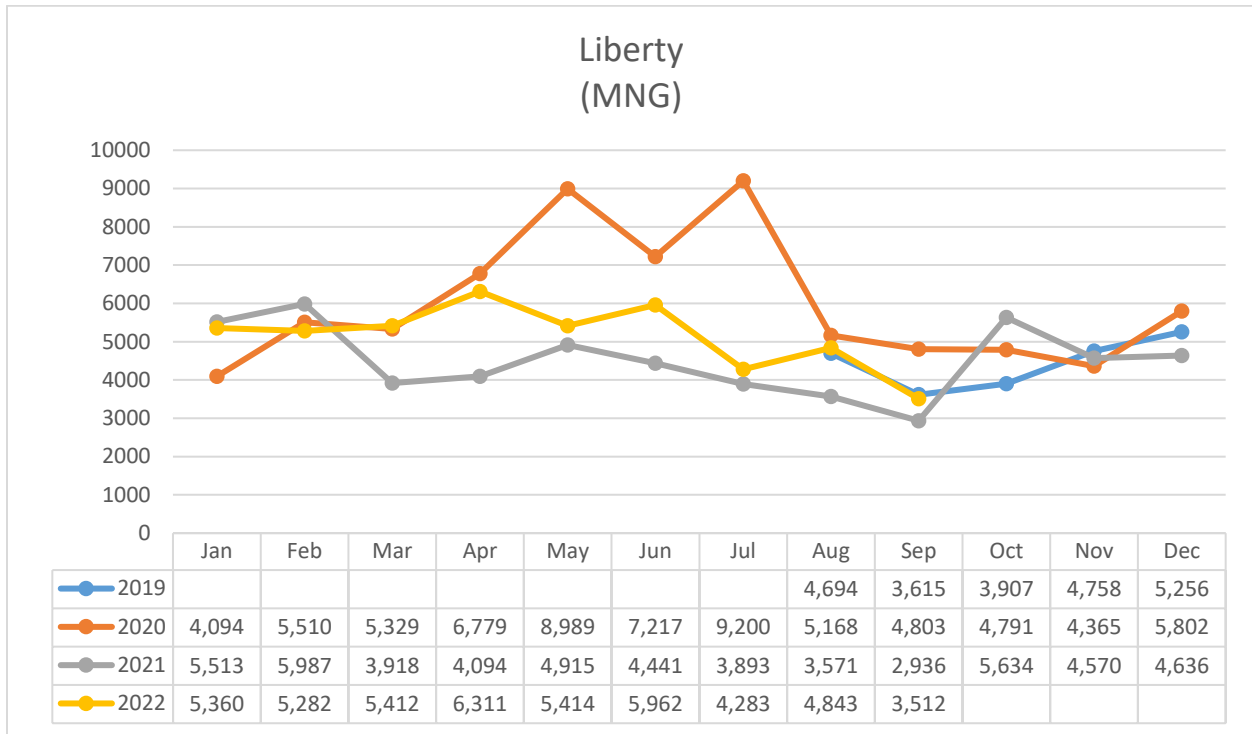
Question 1 (Liberty (MNG) - Gas)

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



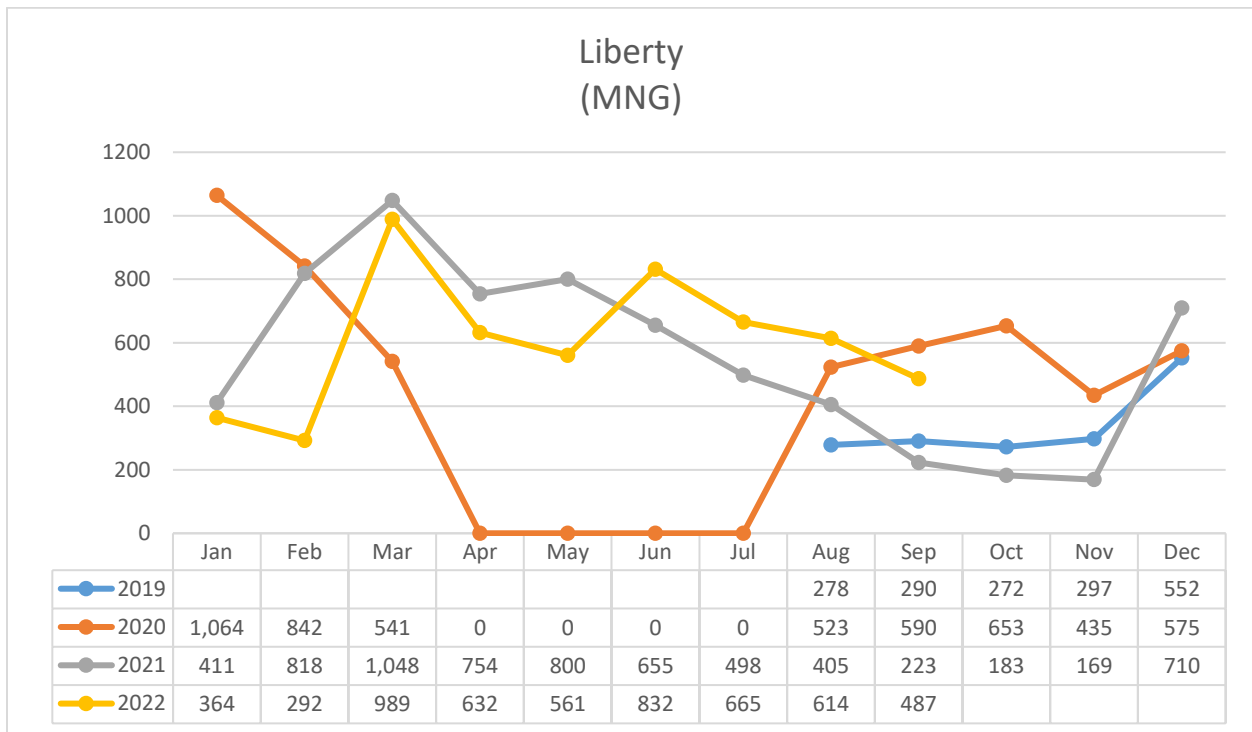
As shown in the previous graph, Liberty (MNG) performed 51% more disconnections for non-payment in July 2022 versus July 2021, 6% fewer in August 2022 versus August 2021, and 25% fewer in September 2022 versus September 2021. There were 62% fewer disconnections for non-payment in July 2022 compared to June 2022, 7% more in August 2022 compared to July 2022, and 51% fewer in September 2022 compared to August 2022. The actual number of disconnections by Liberty (MNG) for July 2022 was 55% below the amount projected by Liberty (MNG) for the same month, 17% below in August 2022, and 59% below in September 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”



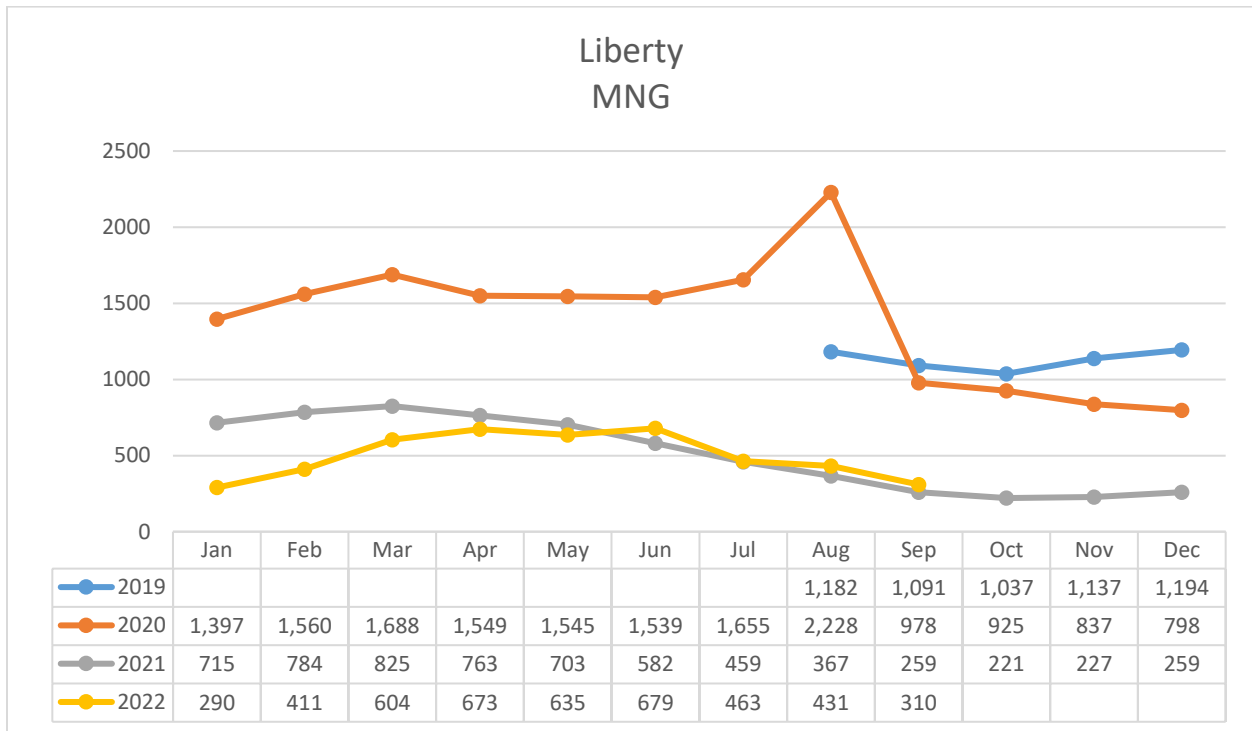
The previous data indicates that there were approximately 10% more Liberty (MNG) customers with past-due accounts in July 2022 versus July 2021, 36% more in August 2022 versus August 2021, and 20% more in September 2022 versus September 2021. There were approximately 28% fewer customers with past-due accounts in July 2022 compared to June 2022, 13% more in August 2022 compared to July 2022, and 27% fewer in September 2022 compared to August 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 34% more customers who were not disconnected in July 2022 versus July 2021, 52% more in August 2022 versus August 2021, and 118% more in September 2022 versus September 2021. There were approximately 20% fewer customers who received a final disconnection notice in July 2022 compared to June 2022, 8% fewer in August 2022 compared to July 2022, and 21% fewer in September 2022 compared to August 2022.

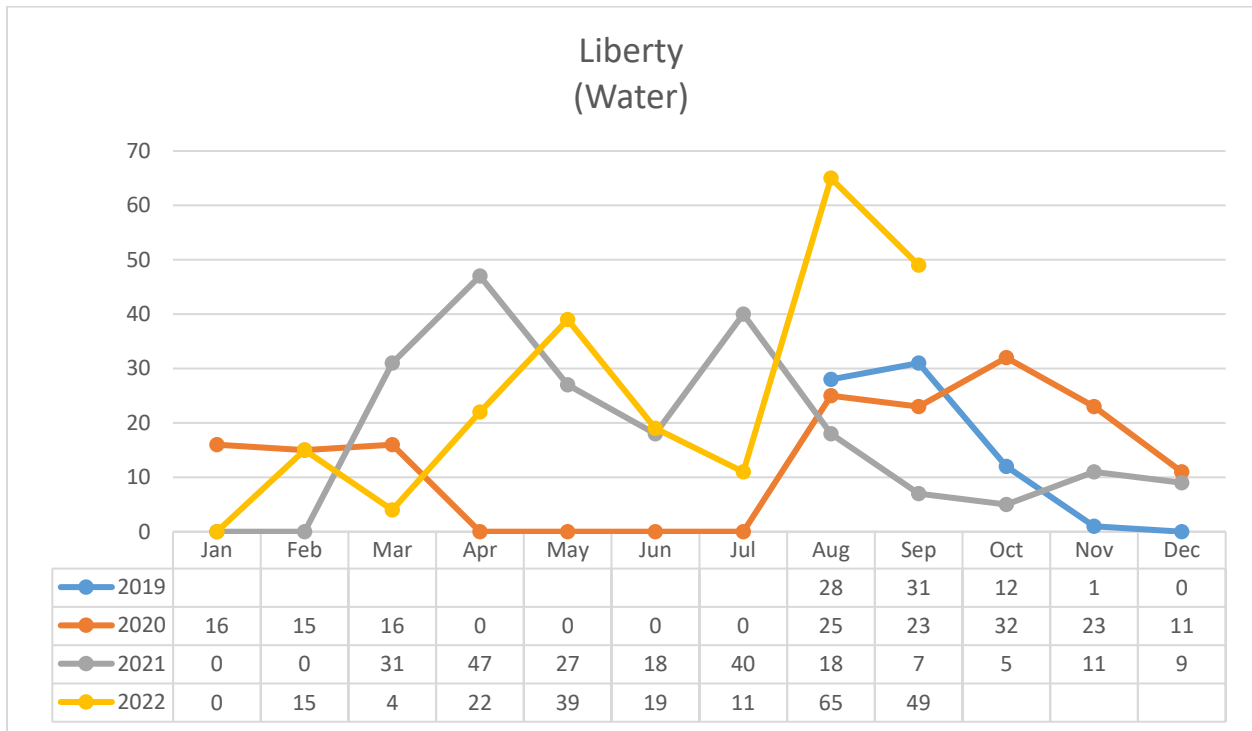
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 1% more Liberty (MNG) customers who participated in payment plans in July 2022 versus July 2021, 17% more in August 2022 versus August 2021, and 20% more in September 2022 versus September 2021. There were 32% fewer customers participating in payment plans in July 2022 compared to June 2022, 7% fewer in August 2022 compared to July 2022, and 28% fewer in September 2022 compared to August 2022.

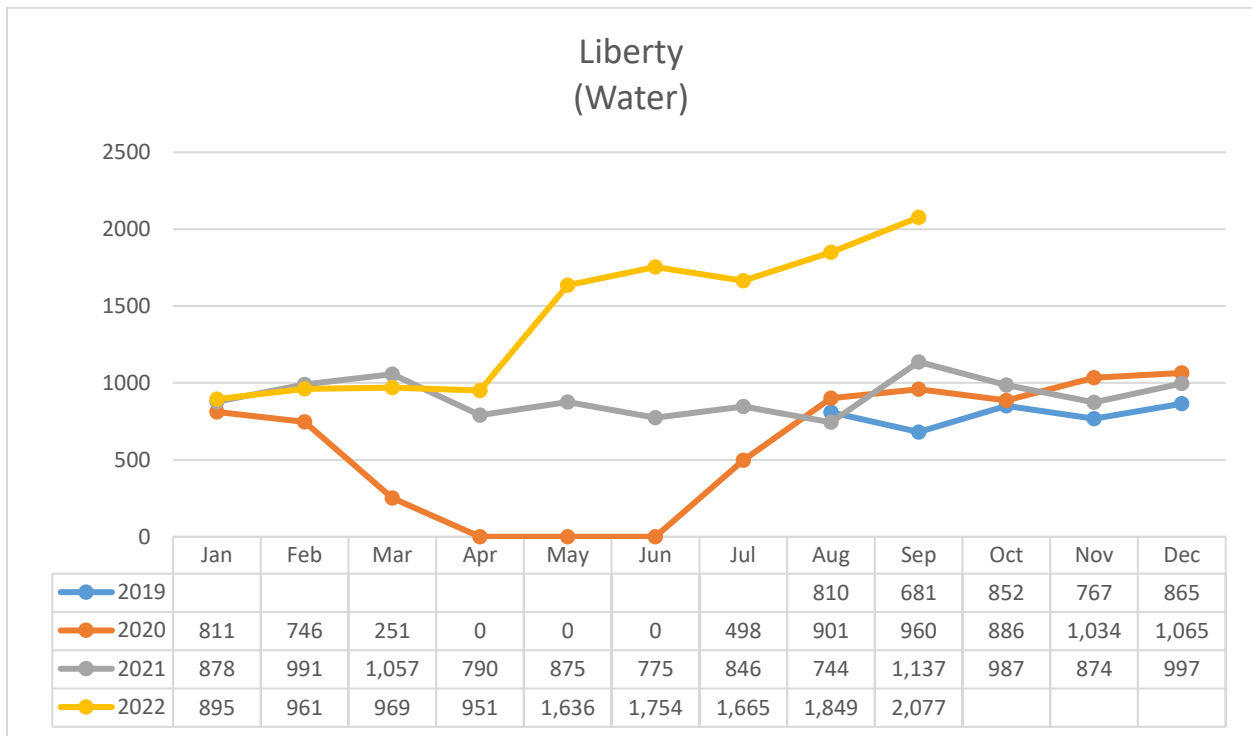
Question 1 (Liberty - Water)

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



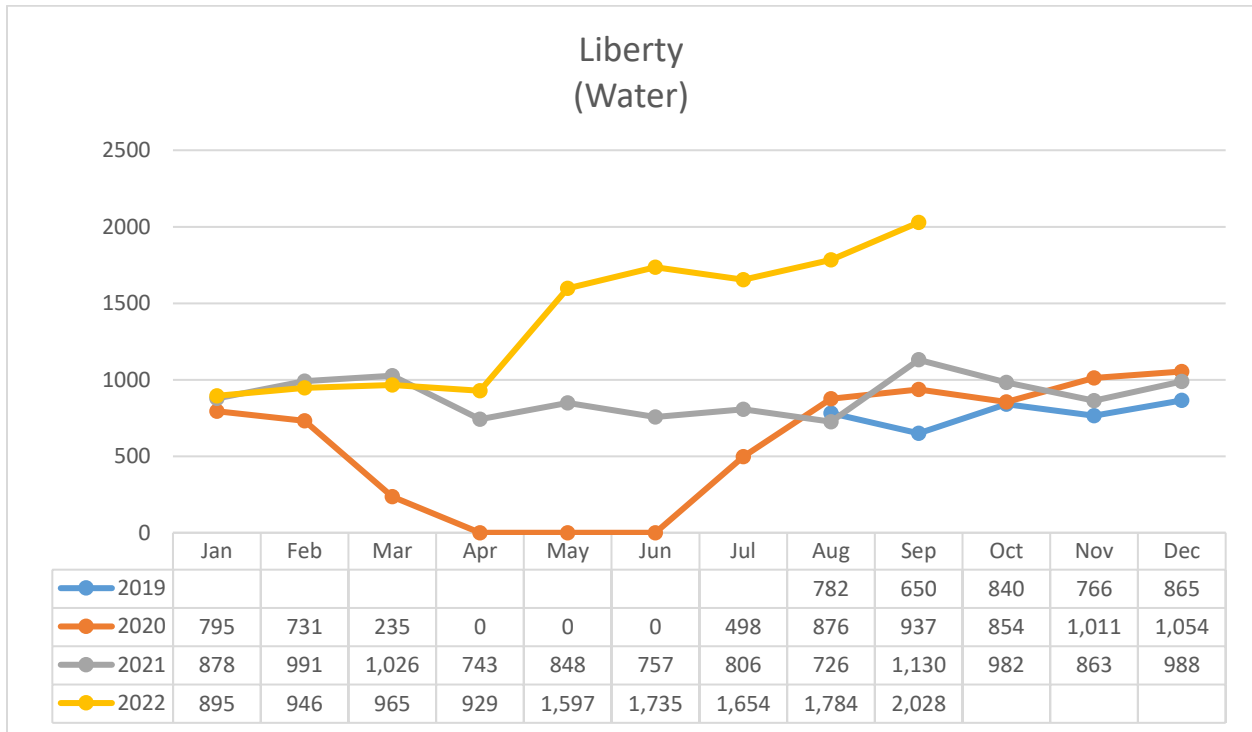
As shown in the previous graph, Liberty performed 73% fewer disconnections for non-payment in July 2022 versus July 2021, 261% more in August 2022 versus August 2021, and 600% more in September 2022 versus September 2021. There were approximately 42% fewer disconnections for non-payment in July 2022 compared to June 2022, 491% more in August 2022 compared to July 2022, and 25% fewer in September 2022 compared to August 2022. The actual number of disconnections by Liberty for July 2022 was 69% below than the projected amount for the same month, 400% above in August 2022, and 1533% above in September 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”



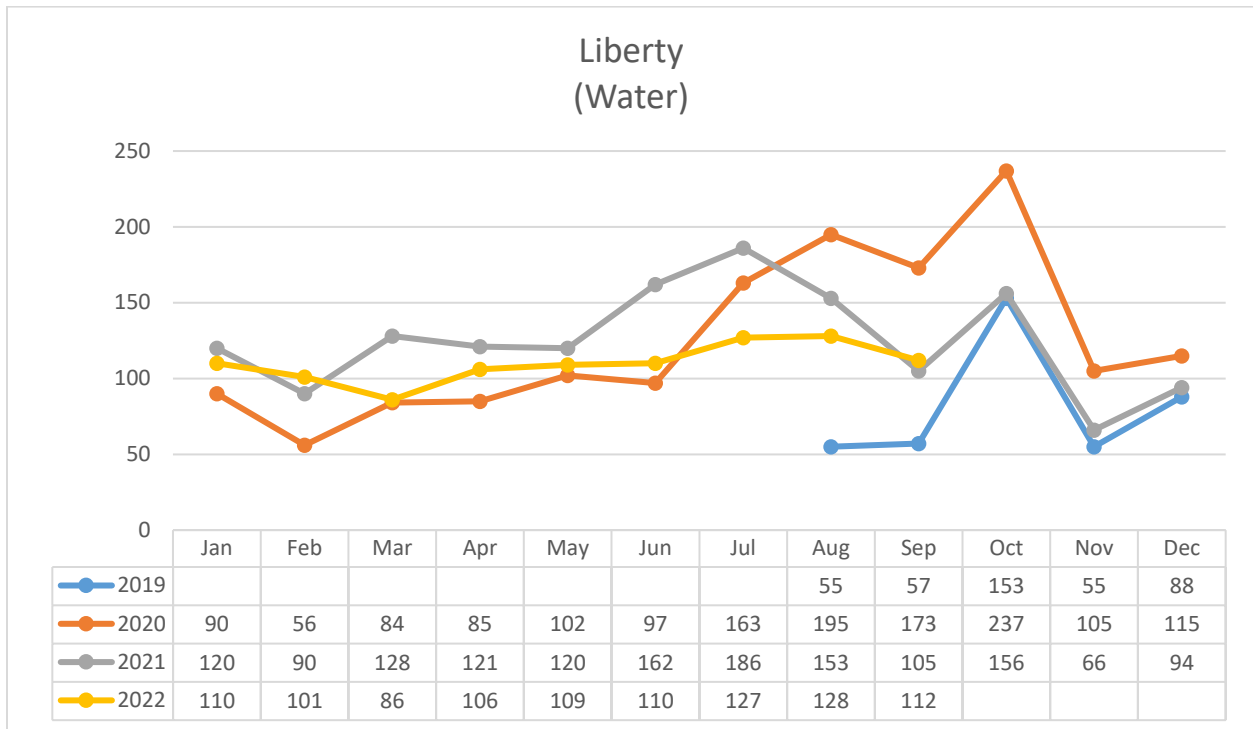
The previous data indicates that there were 97% more Liberty customers with past-due accounts in July 2022 versus July 2021, 149% more in August 2022 versus August 2021, and 83% more in September 2022 versus September 2021. There were approximately 5% fewer customers with past-due accounts in July 2022 compared to June 2022, 11% more in August 2022 compared to July 2022, and 12% more in September 2022 compared to August 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 105% more customers who were not disconnected in July 2022 versus July 2021, 146% more in August 2022 versus August 2021, and 79% more in September 2022 versus September 2021. There were approximately 5% fewer customers who received a final disconnection in July 2022 compared to June 2022, 8% more in August 2022 compared to July 2022, and 14% more in September 2022 compared to August 2022.

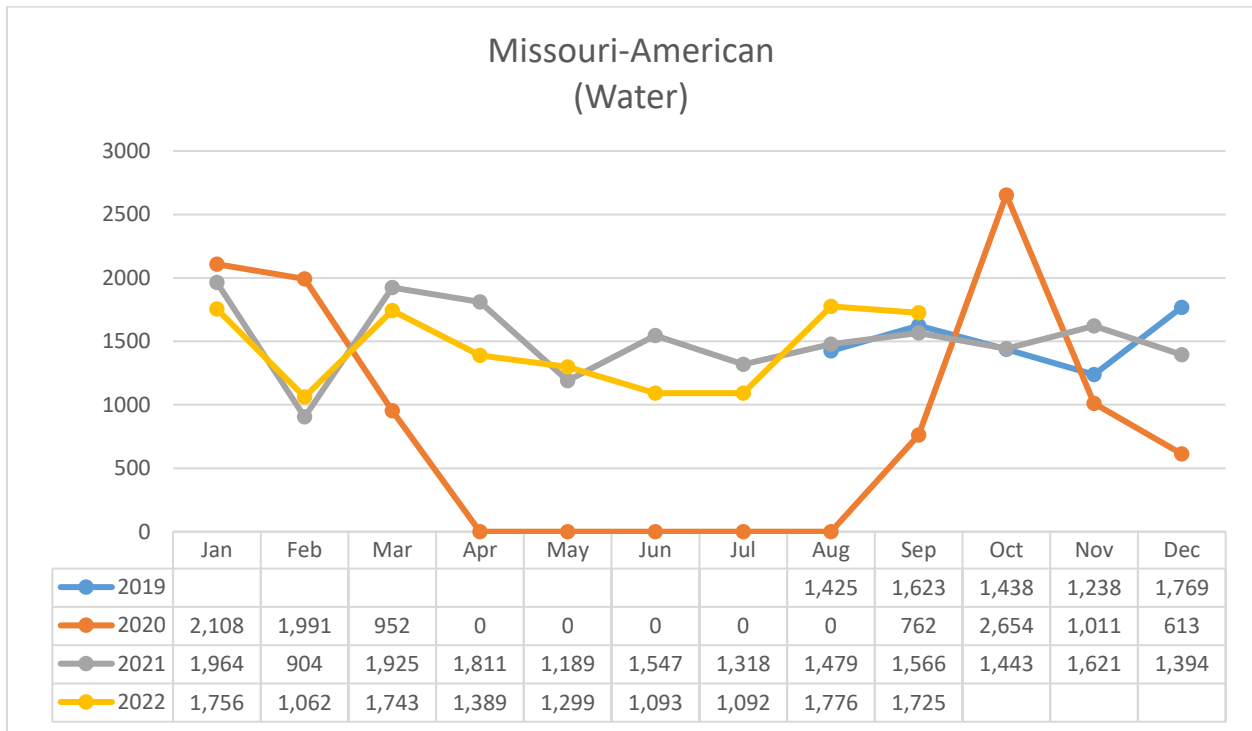
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 32% fewer Liberty customers who participated in payment plans in July 2022 versus July 2021, 16% fewer in August 2022 versus August 2021, and 7% more in September 2022 versus September 2021. There were about 15% more customers who participated in payment plans in July 2022 compared to June 2022, 1% more in August 2022 compared to July 2022, and 13% fewer in September 2022 compared to August 2022.

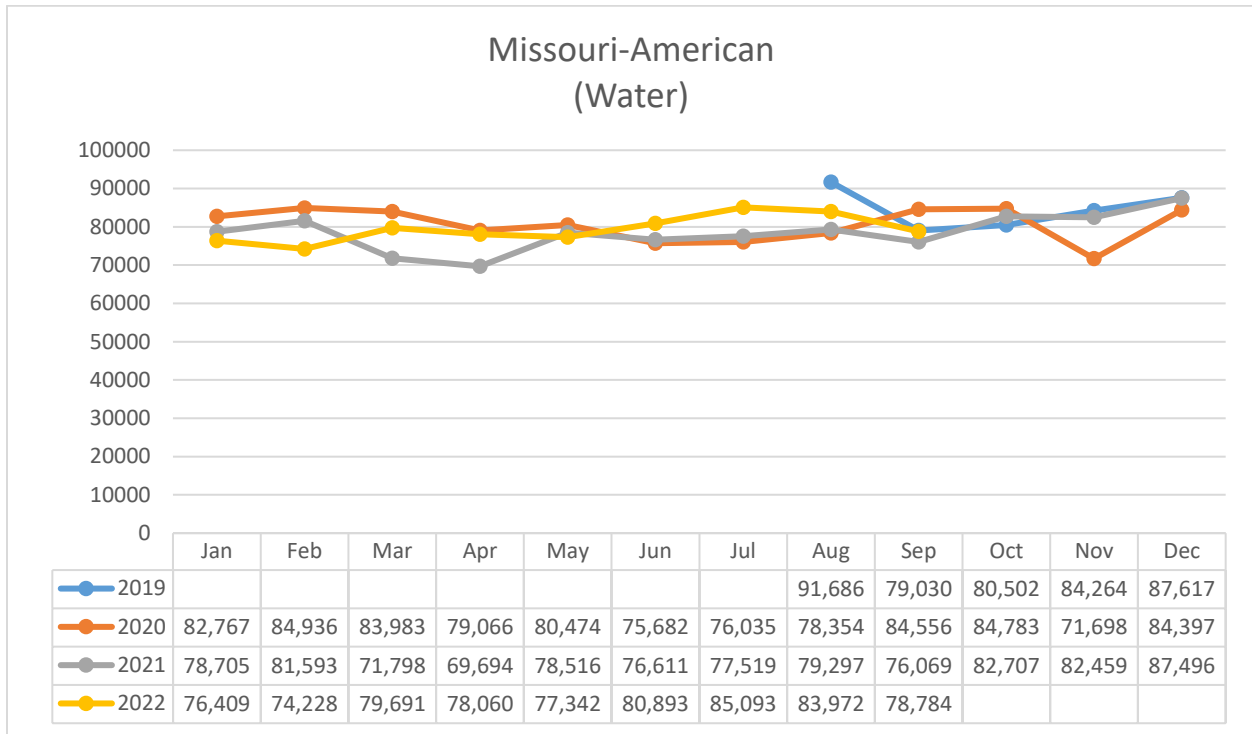
Question 1 (Missouri-American - Water)

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



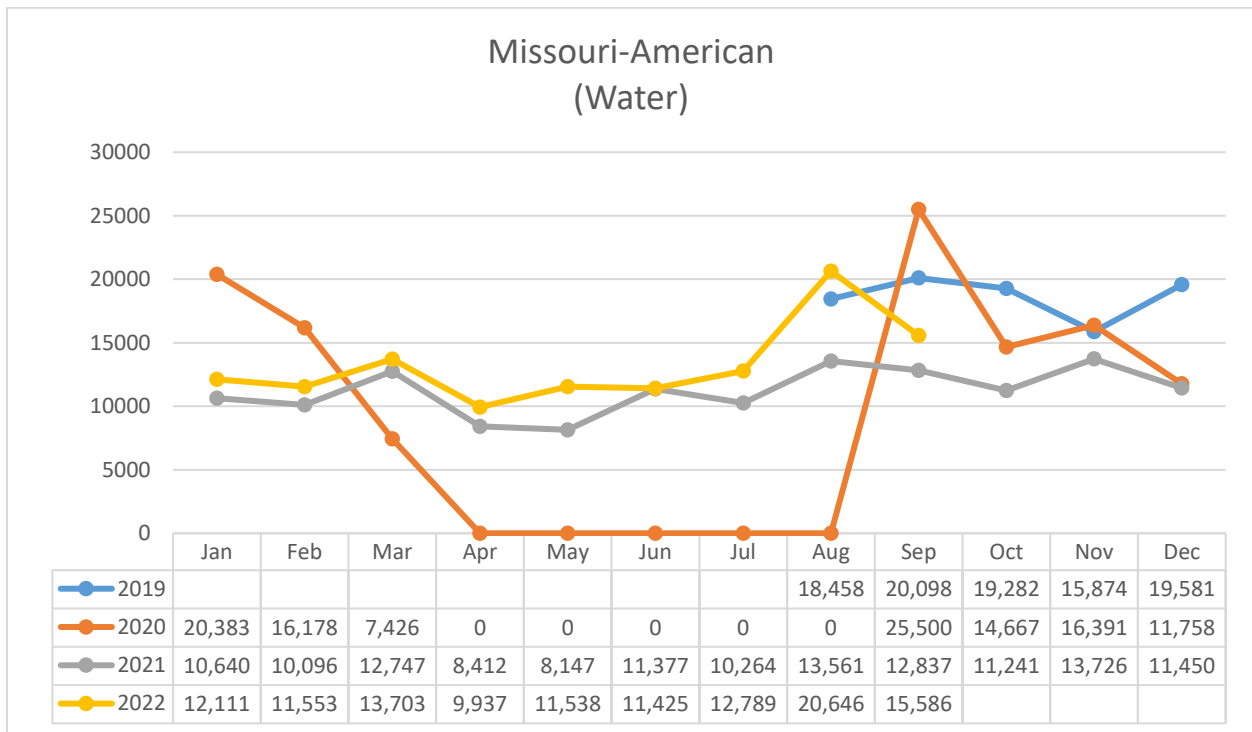
As shown in the previous graph, Missouri-American performed about 17% fewer disconnections for non-payment in July 2022 versus July 2021, 20% more in August 2022 versus August 2021, and 10% more in September 2022 versus September 2021. There one less disconnection for non-payment in July 2022 compared to June 2022, 63% more in August 2022 compared to July 2022, and 3% fewer in September 2022 compared to August 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”



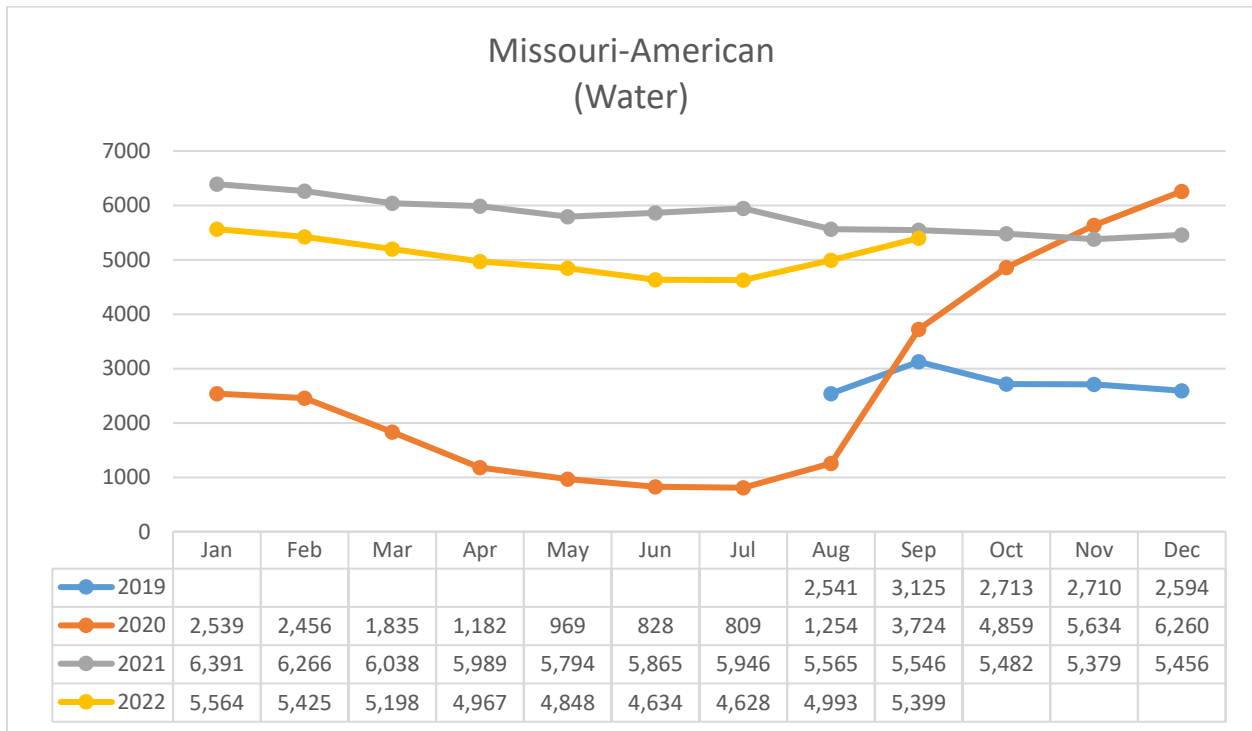
The previous data indicates that there were about 10% more Missouri-American customers with past-due accounts in July 2022 versus July 2021, 6% more in August 2022 versus August 2021, and 4% more in September 2022 versus September 2021. There were approximately 5% more customers with past-due accounts in July 2022 compared to June 2022, 1% fewer in August 2022 compared to July 2022, and 6% fewer in September 2022 compared to August 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 25% more customers who were not disconnected in July 2022 versus July 2021, 52% more in August 2022 versus August 2021, and 21% more in September 2022 versus September 2021. There were approximately 12% more customers who received a final disconnection notice in July 2022 compared to June 2022, 61% more in August 2022 compared to July 2022, and 25% fewer in September 2022 compared to August 2022.

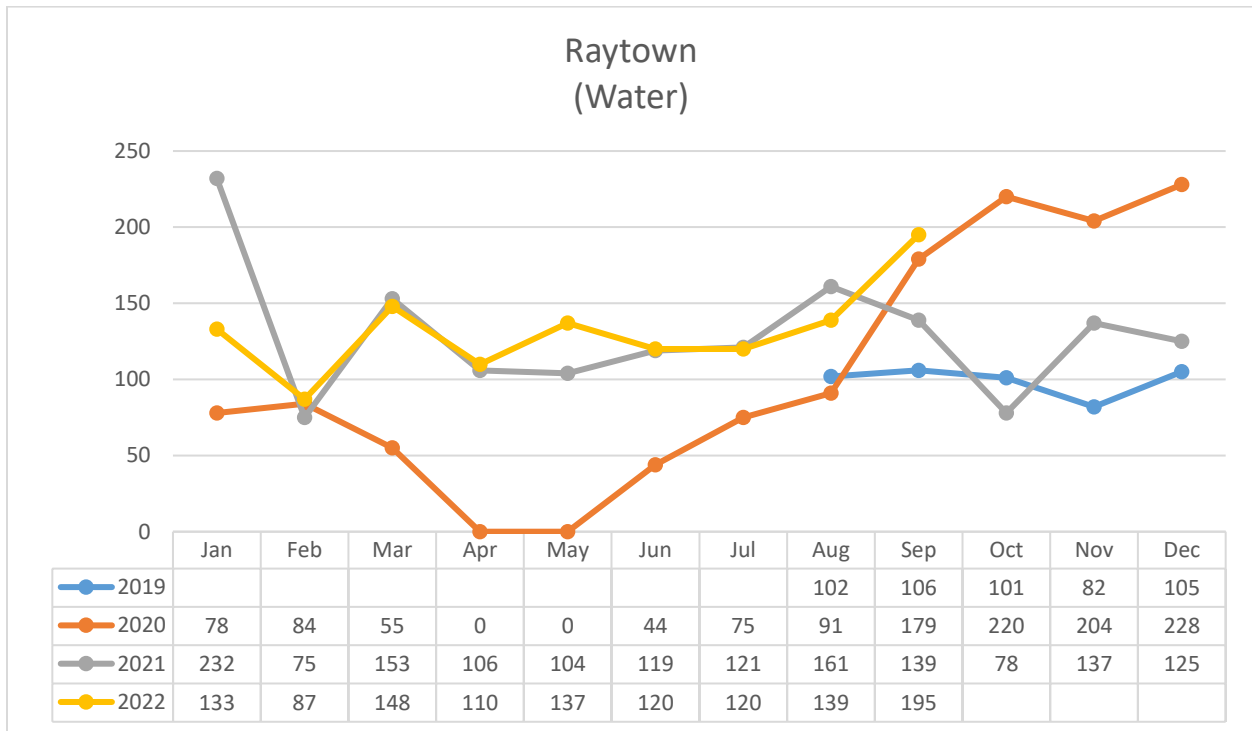
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 22% fewer Missouri-American customers who participated in payment plans in July 2022 versus July 2021, 10% fewer in August 2022 versus August 2021, and 3% fewer in September 2022 versus September 2021. There were less than 1% fewer customers who participated in payment plans in July 2022 compared to June 2022, 8% more in August 2022 compared to July 2022, and 8% more in September 2022 compared to August 2022.

Question 1 (Raytown Water)

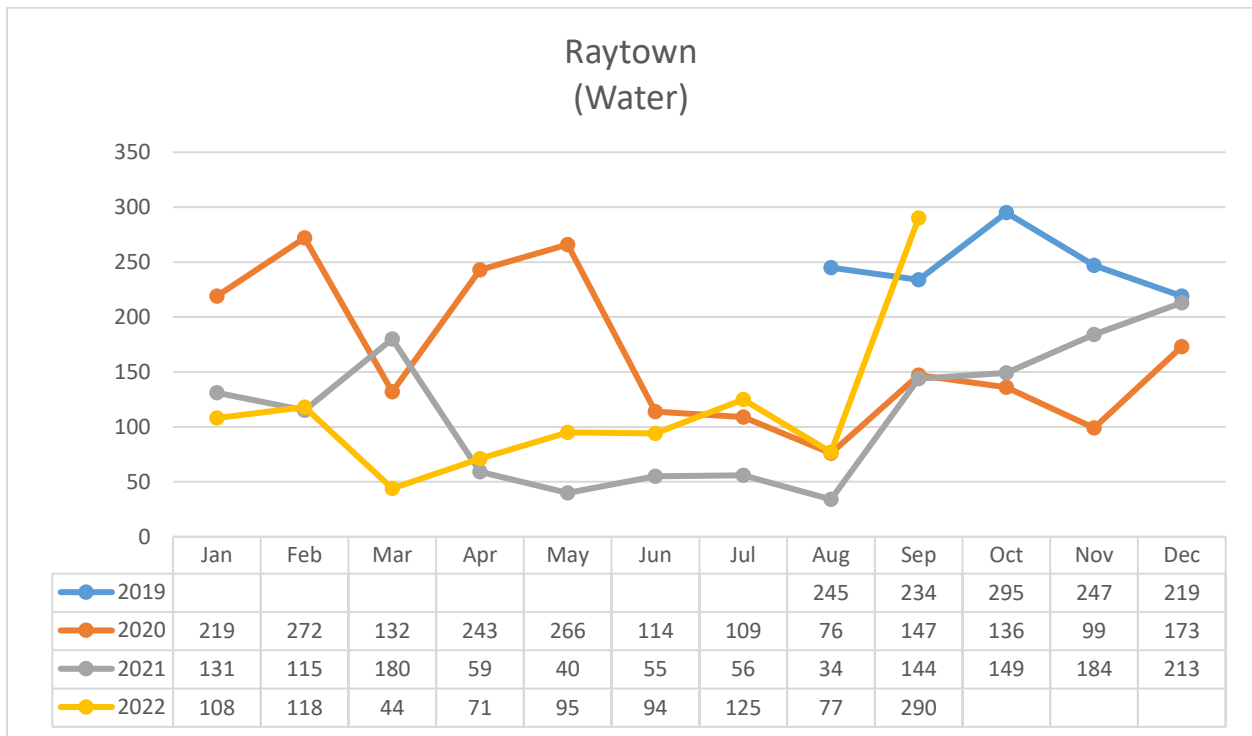
a) The number of disconnections for non-payment of services as of each month-end⁶



As shown in the previous graph, Raytown Water performed approximately 1% fewer disconnections for non-payment in July 2022 versus July 2021, 14% fewer in August 2022 versus August 2021, and 40% more in September 2022 versus September 2021. There were the same number of disconnections for non-payment in July 2022 compared to June 2022, 16% more in August 2022 compared to July 2022, and 40% more in September 2022 compared to August 2022. The projected number of disconnections by Raytown Water was not provided for March 2022 or April 2022. The number of actual disconnections by Raytown in July 2022 was approximately 10% below than the amount projected by Raytown for the same month, 21% below for August 2022, and 30% above for September 2022.

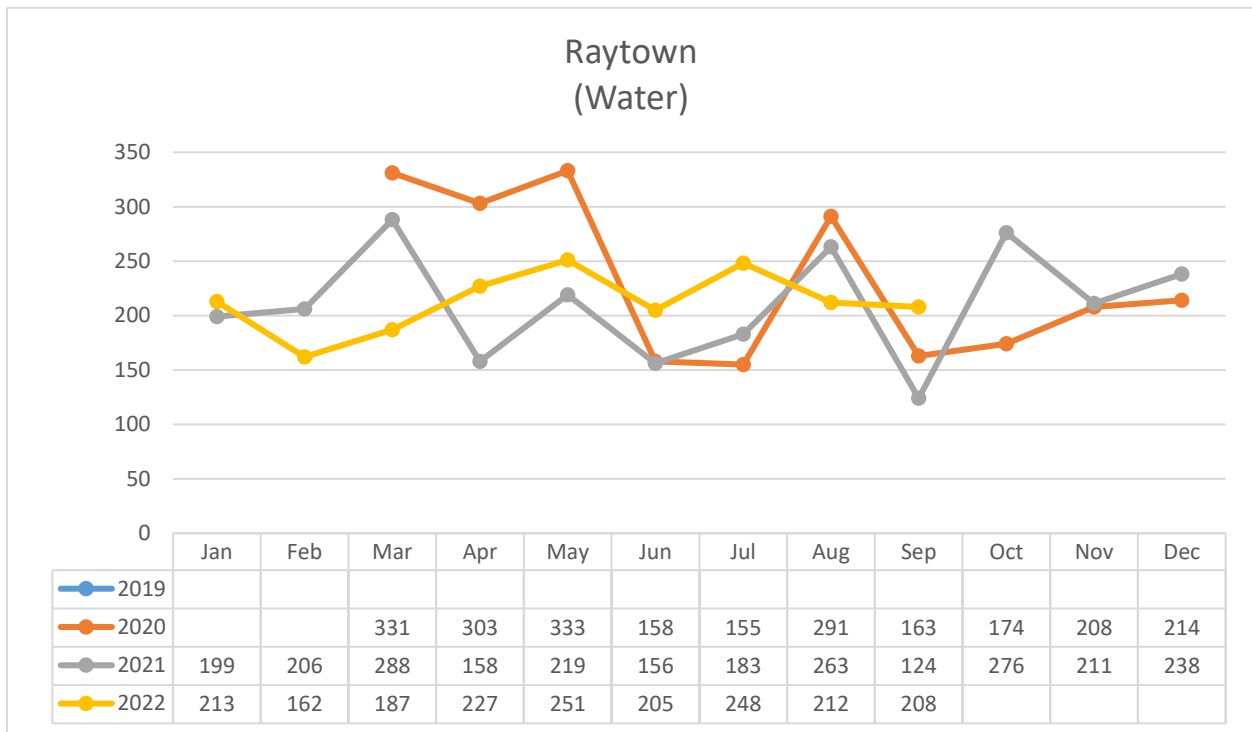
⁶ Disconnection data changed from previous month response. Number updated and correspondence sent regarding an explanation. Nothing received as of the date of the report.

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”



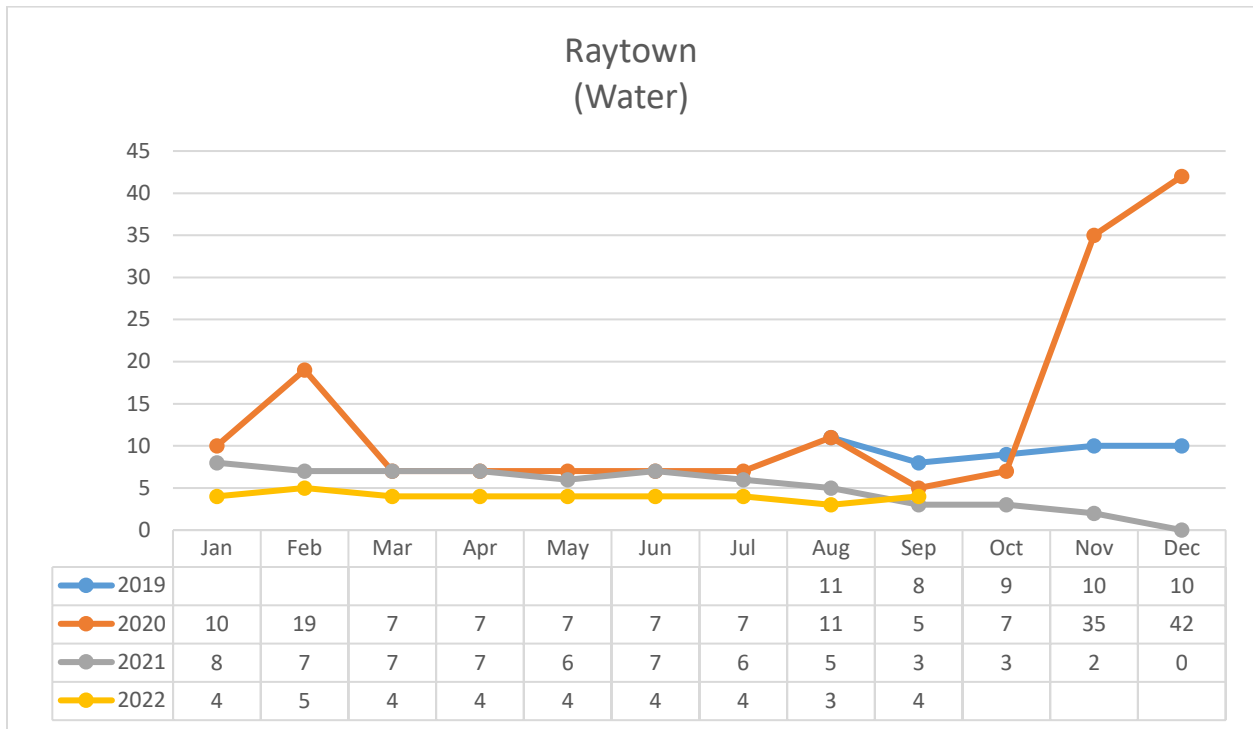
The previous data indicates that there were 123% more Raytown Water customers with past-due accounts in July 2022 versus July 2021, 126% more in August 2022 versus August 2021, and 101% more in September 2022 versus September 2021. There were 33% more customers with past-due accounts in July 2022 compared to June 2022, 38% more in August 2022 compared to July 2022, and 277% more in September 2022 compared to August 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 36% more customers who were not disconnected in July 2022 versus July 2021, 19% fewer in August 2022 versus August 2021, and 68% more in September 2022 versus September 2021. There were approximately 21% more customers who received a final disconnection notice in July 2022 compared to June 2022, 15% fewer in August 2022 compared to July 2022, and 2% fewer in September 2022 compared to August 2022.

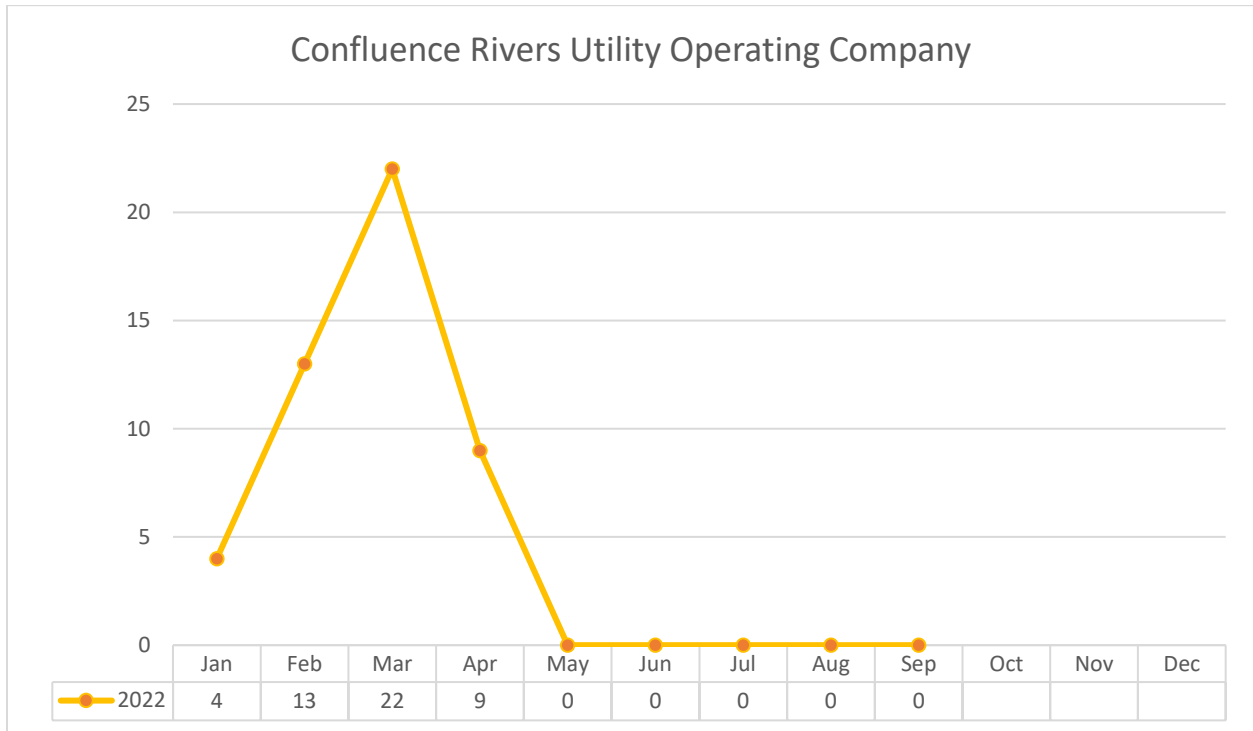
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were 33% fewer customers of Raytown Water who participated in payment plans in July 2022 versus July 2021, 40% fewer in August 2022 versus August 2021, and 33% more in September 2022 versus September 2021. There were the same number of customers participating in a payment plan in July 2022 compared to June 2022, 1 less customer participating in a payment plan for August 2022 compared to July 2022, and 1 more customer participating in a payment plan in September 2022 compared to August 2022.

Question 1 (Confluence Rivers - Water)⁷

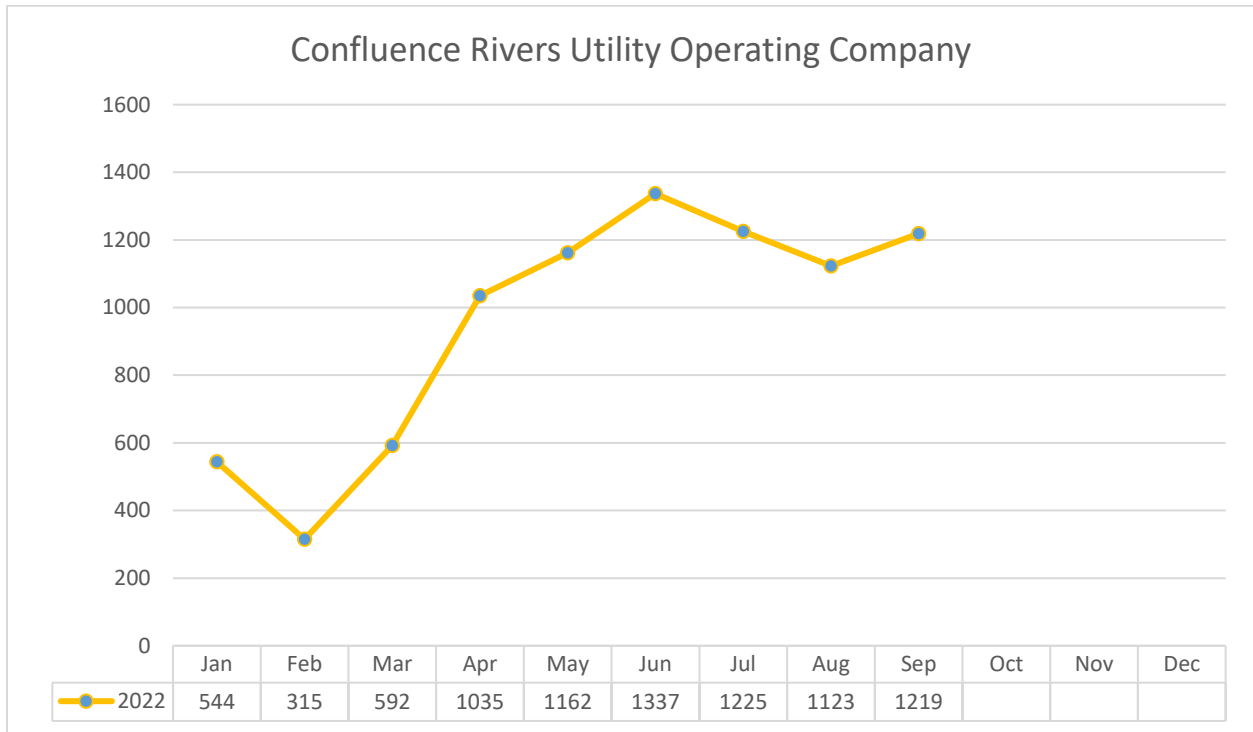
a) The number of disconnections for non-payment of services as of each month-end



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

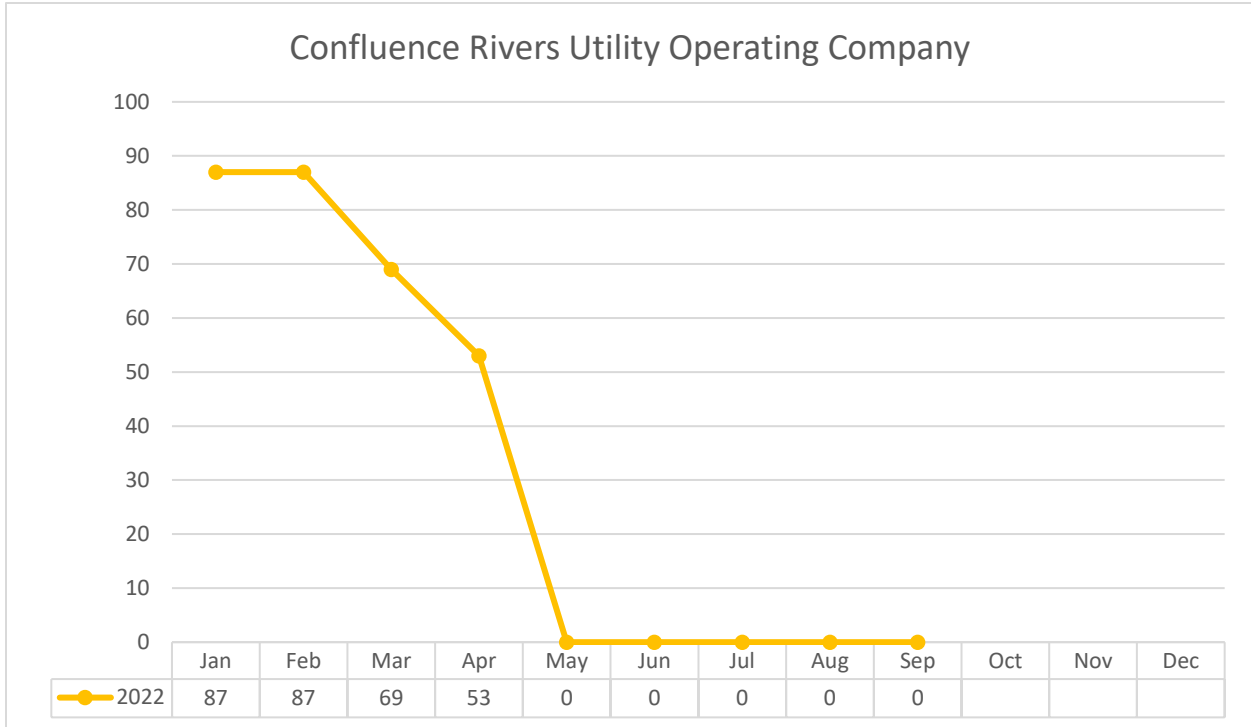
⁷ Per Response to Staff Data Request No. 0011.2, Confluence Rivers has adopted a new customer billing platform and, as such, has suspended shut offs and late fees for the time being.

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”



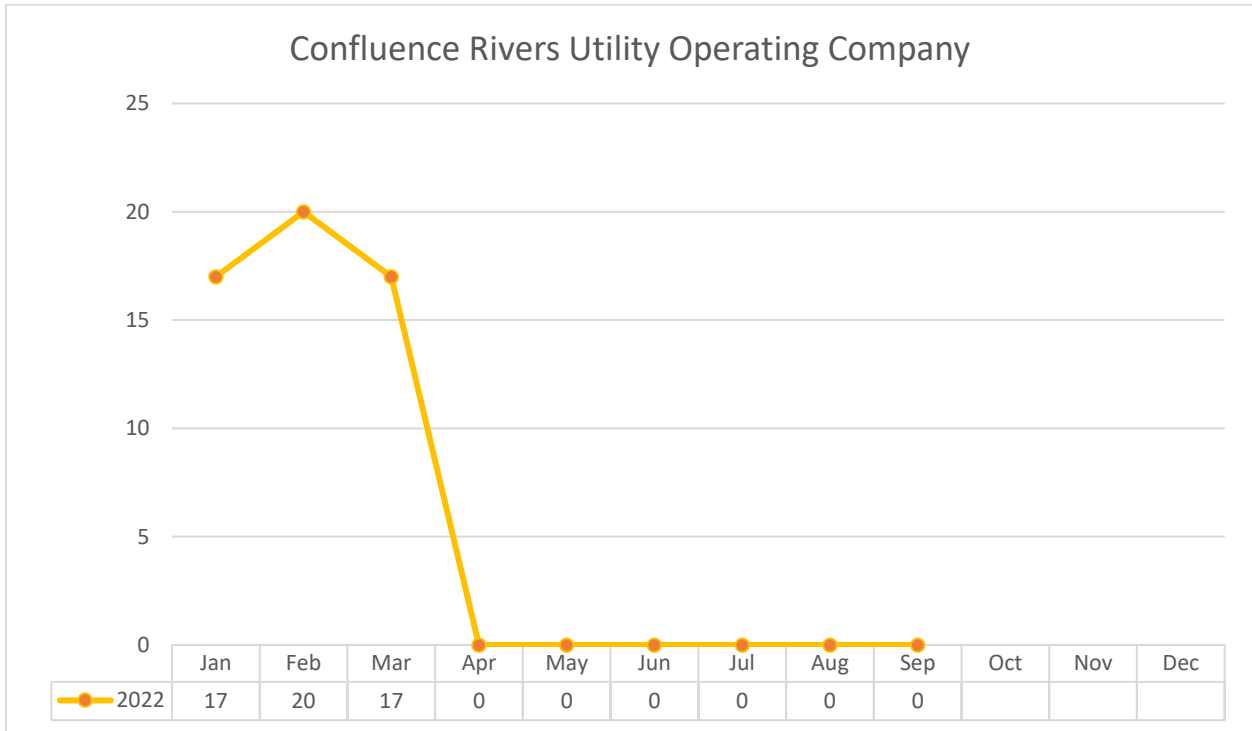
The previous data indicates there were 8% fewer Confluence Rivers’ customers with past-due accounts in July 2022 compared to June 2022, 8% fewer in August 2022 compared to July 2022, and 9% more in September 2022 compared to August 2022. Confluence Rivers reported that it defines “past-due” as any account 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 July, August, and September 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 July, August, and September 2022.

Question 2

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

Ameren Missouri (Electric)

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

Empire (Electric)

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

Evergy Metro (Electric)

3/2022	4/2022	5/2022	6/2022	7/2022	8/2022	9/2022	10/2022	11/2022	12/2022
800	1,400	1,400	1,600	3,000	3,500	3,200	3,000		

Evergy West (Electric)

3/2022	4/2022	5/2022	6/2022	7/2022	8/2022	9/2022	10/2022	11/2022	12/2022
500	730	730	780	1,500	2,400	2,100	2,000		

Ameren Missouri (Gas)

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

Spire (Gas)

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

Summit (Gas)

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

Empire (Gas)

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

Liberty (MNG) (Gas)

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

Liberty (Water)

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

Missouri-American (Water)

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

Raytown Water

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

Confluence Rivers (Water)

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