

**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*, and directed Staff 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. Through Staff’s DRs in this docket, initially filed on August 24, 2020, state utilities were asked to update these numbers on a monthly basis.

2. As more thoroughly discussed in Staff’s Report, attached hereto as Appendix A, Staff has received updated information through the end of November 2020 from some of the state’s utilities, and now presents the data for the Commission’s review.

3. In its *Order Extending Direction to Staff to Gather Information About Utility Disconnections* (“Order”), the Commission ordered the state utilities to file updates regarding its disconnection data by the 15th of every month. However, the following state utilities missed the Commission’s ordered deadline:

- a. The Central States Water Resources (“CSWR”) entities, which include:
 - i. Confluence Rivers Utility Operating Company, Inc.;
 - ii. Elm Hills Utility Operating Company, Inc.;
 - iii. Hillcrest Utility Operating Company, Inc.;
 - iv. Indian Hills Utility Operating Company, Inc.; and
 - v. Raccoon Creek Utility Operating Company, Inc.
- b. Raytown Water Company (“Raytown”);
- c. Spire Missouri, Inc. d/b/a Spire (“Spire”); and
- d. Summit Natural Gas of Missouri, Inc. (“Summit”).

4. Summit did not file the updated data in EFIS until December 17, 2020. Raytown and Spire filed the updated data in EFIS on December 21, 2020, the day before Staff’s report was due to be filed. However, Raytown mistakenly filed a response to data requests from the Office of the Public Counsel.¹

5. This mistake stresses the importance of state utilities filing the requested information by the 15th of every month, in compliance with the Order. When compiling last month’s report, Staff discovered that The Empire District Gas Company d/b/a Liberty, Liberty Utilities (Missouri Water) d/b/a Liberty Utilities, and Liberty Utilities (Midstates National Gas) Corp. d/b/a Liberty Utilities (MNG) d/b/a Liberty (MNG) all filed incorrect data. However, because these utilities filed their responses far in advance of Staff’s filing date,² there was time to clarify and correct the responses so that all three utilities could

¹ Raytown’s responses were to the Office of the Public Counsel data requests 2154-2164. Raytown should have responded to Staff data request 0009.

² All three utilities filed their initial responses on November 10, 2020, twelve days before Staff’s ordered filing date of November 22, 2020.

be included in Staff's report; Raytown's late filing leaves no time for a similar chance at correction.

6. While Spire and Summit did eventually produce the updated data, and Raytown attempted to file the correct data, the CSWR entities have not submitted anything at the time of this report's filing.

7. This is the second report in which the CSWR entities and Raytown failed to get updated disconnection data to Staff for incorporation in its report. CSWR and Raytown did not provide updated disconnection data in time for Staff's report filed on October 15, 2020. The missing data was received in time for Staff's subsequent report filed on November 23, 2020.

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

Respectfully Submitted,

/s/ Travis J. Pringle

Travis J. Pringle

Missouri Bar No. 71128

Associate Counsel for the Staff of the
Missouri Public Service Commission

P.O. Box 360

Jefferson City, Mo 65102-0360

(573) 751-4140 (Telephone)

(573) 751-9285 (Facsimile)

(Email) travis.pringle@psc.mo.gov

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 this 22nd day of December, 2020.

/s/ Travis J. Pringle

MISSOURI PUBLIC SERVICE COMMISSION

STAFF REPORT



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

FILE NO. AW-2020-0356

DECEMBER 22, 2020

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FOR RECOVERY OF PAST-DUE UTILITY CUSTOMER PAYMENTS
AFTER THE COVID-19 PANDEMIC EMERGENCY

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Staff Report on Utility Data Request Responses in

File No. AW-2020-0356

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

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

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

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

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

through February 2021, with an explanation of the methodology and assumptions used to develop these projections. 3) Please provide the same information requested in 1)(a) through 1)(d) applicable to your Company's August 2019 through February 2020 billing cycles.

For purposes of this updated report, the following utilities responded to this Staff data request with month-end November 2020 data, and their responses are included in this report: Ameren Missouri ("Ameren Missouri - Electric"); Ameren Missouri ("Ameren Missouri - Gas"); Evergy Missouri Metro, Inc. ("Evergy Metro – Electric"); Evergy Missouri West ("Evergy West – Electric"); Summit Natural Gas of Missouri ("Summit – Gas"); The Empire District Electric Company ("Empire - Electric"); The Empire District Gas Company ("Empire - Gas"); Spire Missouri, Inc. ("Spire – Gas"); Liberty Utilities (Missouri Water), LLC ("Liberty – Water"); Liberty Midstates Gas ("Liberty – MNG – Gas"); Missouri-American Water Company ("Missouri American Water – Water").

The following utilities did not respond to the Staff data request with month-end November 2020 data in time to incorporate the information into this report: The Raytown Water Company ("Raytown 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"). All of the above listed utilities, except for Raytown Water, are part of the Central States Water Resources ("CSWR") family of water and sewer utilities. Information for the Raytown Water and CSWR utilities will be provided through month-end October 2020 in this report and the month-end November 2020 data, if received, will be included in the January 2021 update 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 February 2020 (orange dots and line), and for the period of August 2020 through November 2020 (blue dots and line). As this report is updated in the future, the blue dots and line will eventually extend through at least February 2021. This method of presentation will allow for a direct comparison of the reported information for each month from August 2020 to February 2021 with the same month one year earlier. Also, the report will specify the most recent month-to-month percentage change for each category of information (e.g., number of disconnections in November 2020 compared to October 2020).

Summary of Responses to Questions 1 and 3

Regarding Question 1a and 3a, most of the utilities reported an increase in the number of customer disconnections in November 2020 compared to the amount from November 2019. However, almost all of the utilities reported decreases in the number of disconnections for November 2020 compared to the previous month, October 2020, with most of the decreases being sizeable.

For Question 1b and 3b, most utilities reported increases in the number of past-due customer accounts in November 2020 compared to the amount from November 2019. Looking at all the utilities included in the report, there appeared to be an overall slight decrease for past-due accounts in November 2020 compared to the previous month.

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

There was no clear trend upward or downward for this metric for November 2020 compared to the previous month.

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

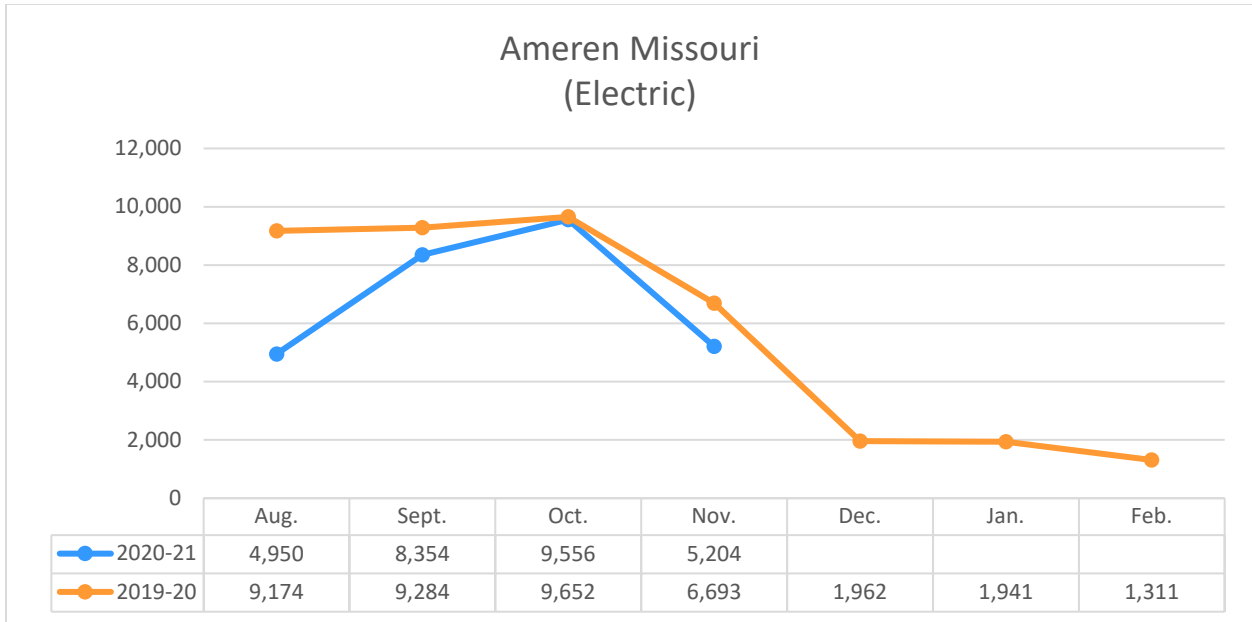
For Question 2 (utility projections of number of disconnections for the period September 2020 through February 2021), no new information was provided by the utilities since the last report was filed other than the updated estimates for January and February 2021 provided by Evergy Metro and Evergy West.

Individual Utility Responses:

Questions 1 & 3 (Ameren Missouri – Electric)

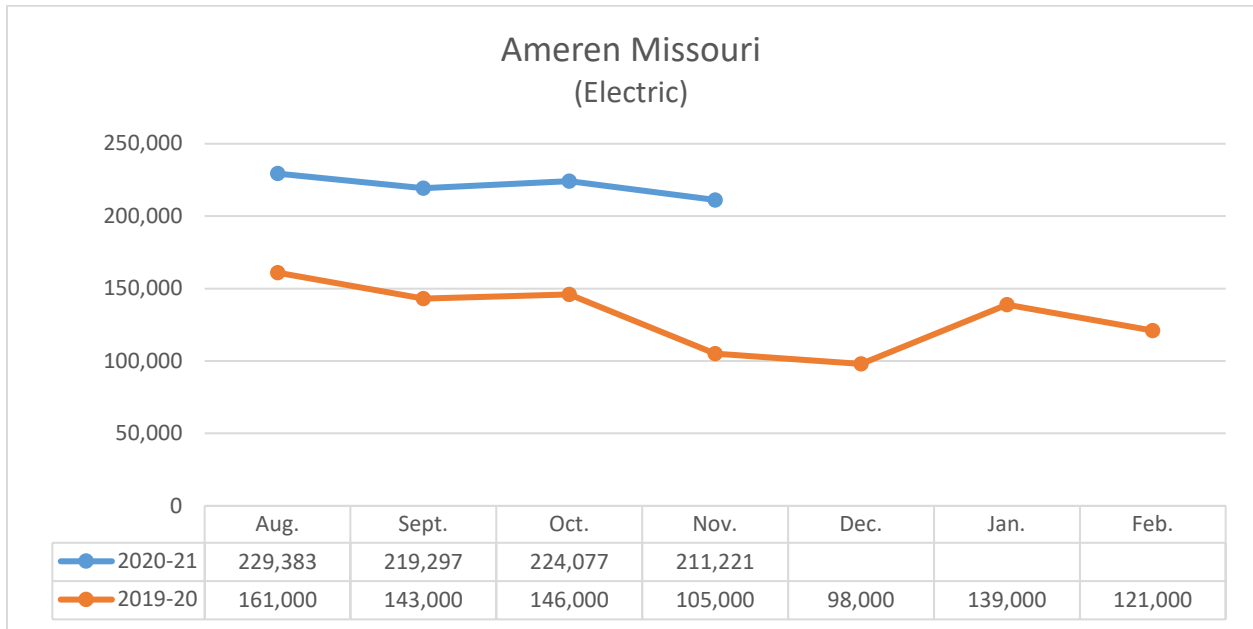
Ameren Missouri – Electric submitted some revised data for Questions 1a, 1b, and 1c for August and September 2020 when it provided its October 2020 data. This corrected information is reflected in the following graphs and accompanying narrative.

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



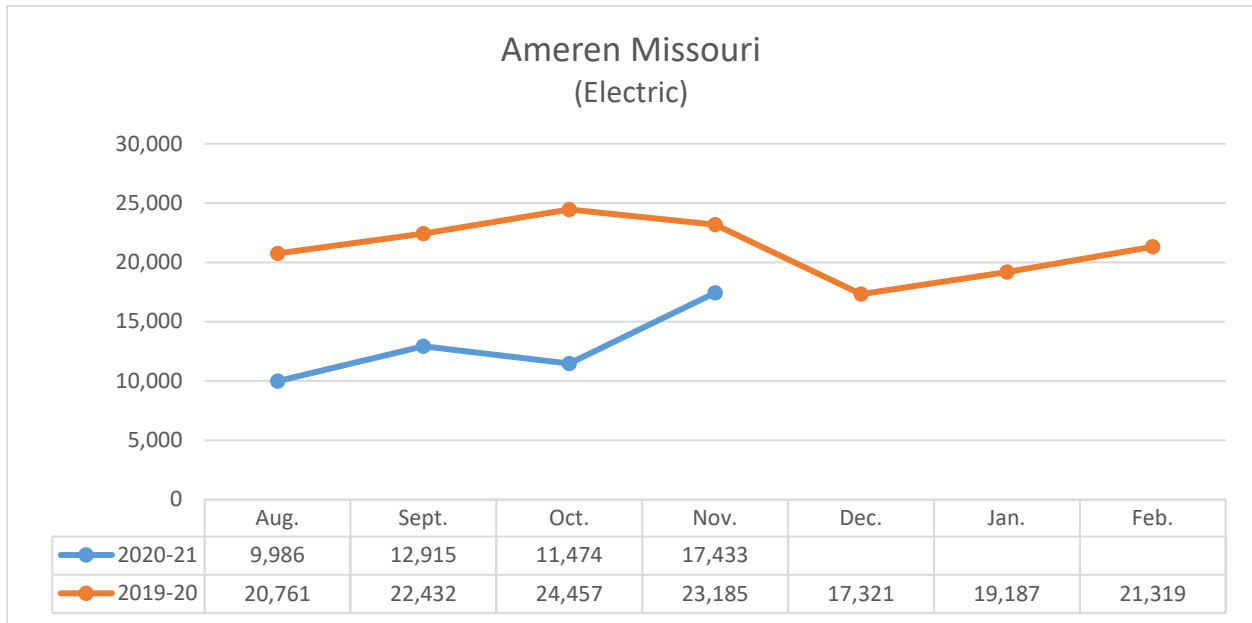
As shown in the previous graph, Ameren Missouri performed approximately 22% fewer disconnections for non-payment in November 2020 versus November 2019 and about 46% fewer in November 2020 than in October 2020. The number of actual disconnections by Ameren Missouri in November 2020 was approximately 26% below the number projected by Ameren Missouri for the same month.

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



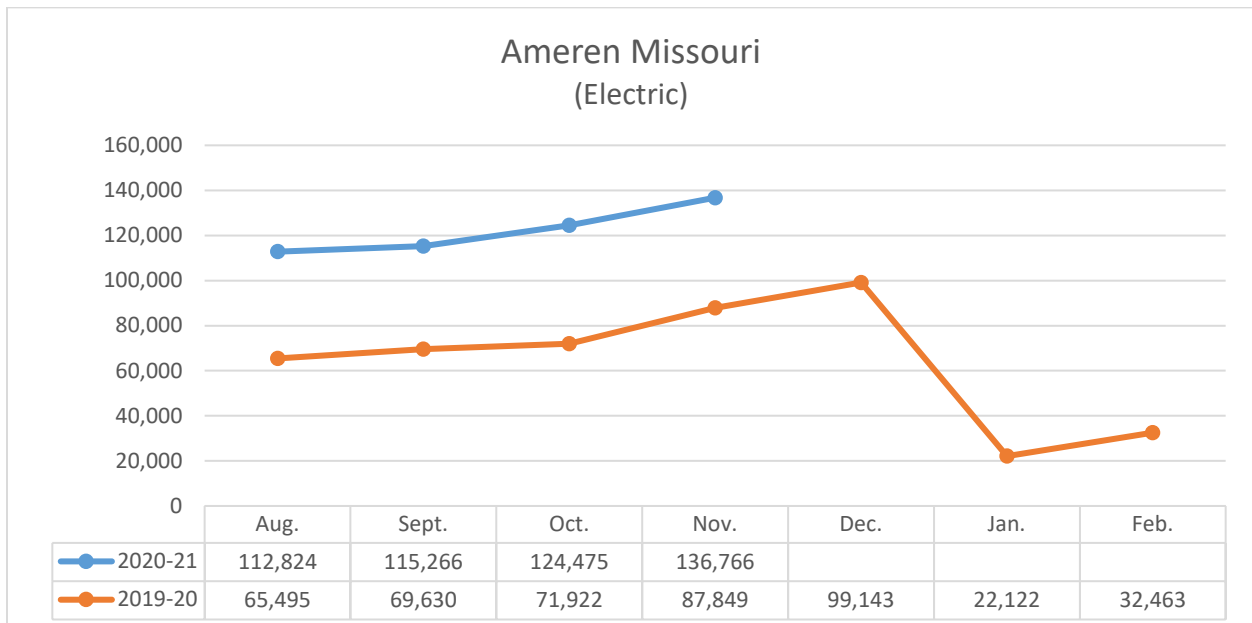
The previous data indicates that there were about 101% more Ameren Missouri customers with past-due accounts in November 2020 versus November 2019 and approximately 6% fewer in November 2020 than in October 2020. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

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



As shown by Ameren Missouri’s data, for those customers who received a final disconnection notice there were about 25% fewer customers who were not disconnected in November 2020 versus November 2019 and approximately 52% more in November 2020 than in October 2020.

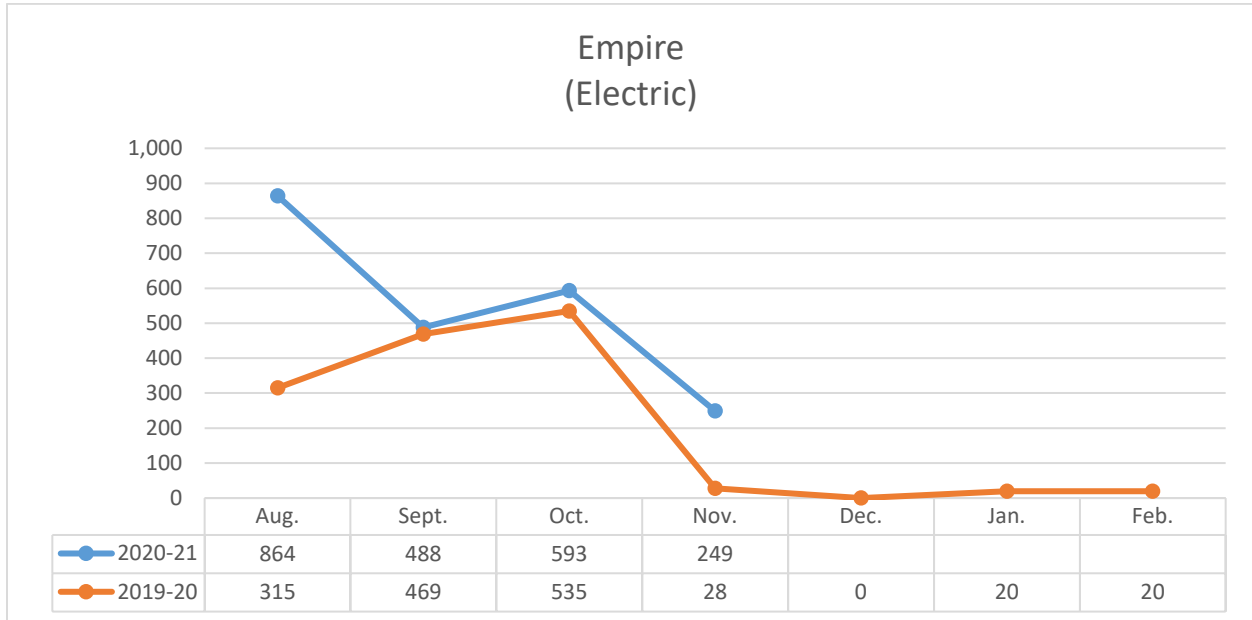
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 56% more Ameren Missouri customers who participated in payment plans in November 2020 versus November 2019 and about 10% more in November 2020 than in October 2020.

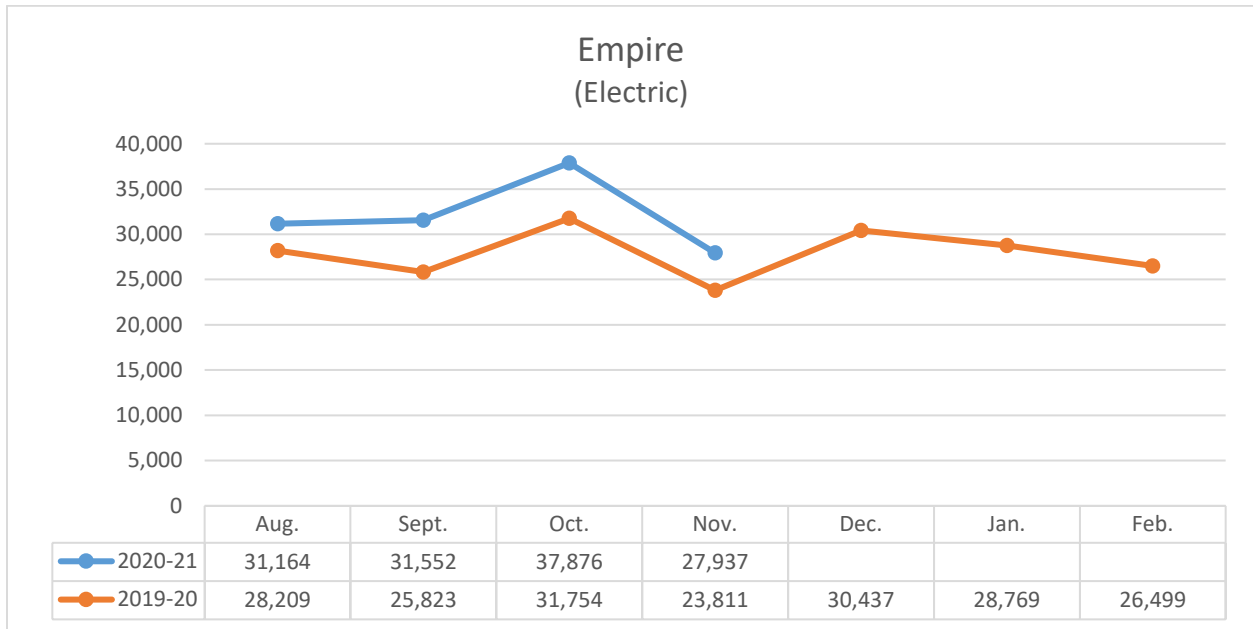
Questions 1 & 3 (Empire – Electric)

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



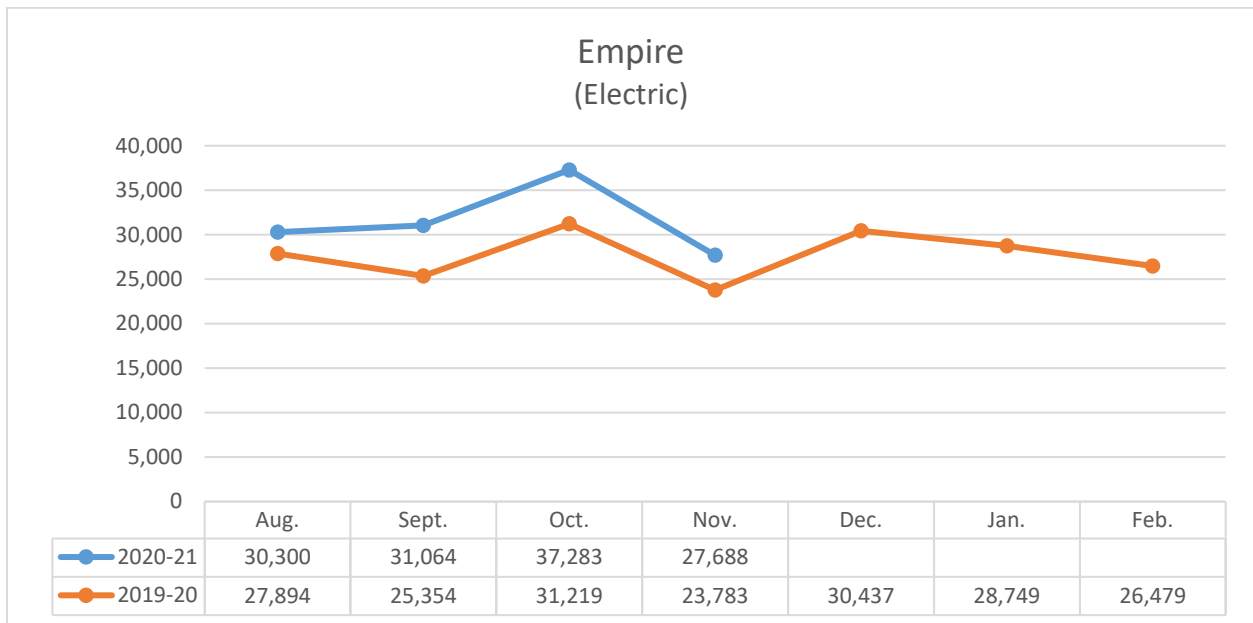
As shown in the previous graph, Empire performed approximately 789% more disconnections for non-payment in November 2020 versus November 2019 and about 58% fewer in November 2020 than in October 2020. The number of actual disconnections by Empire in November 2020 was approximately 398% above the number projected by Empire for the same month.

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



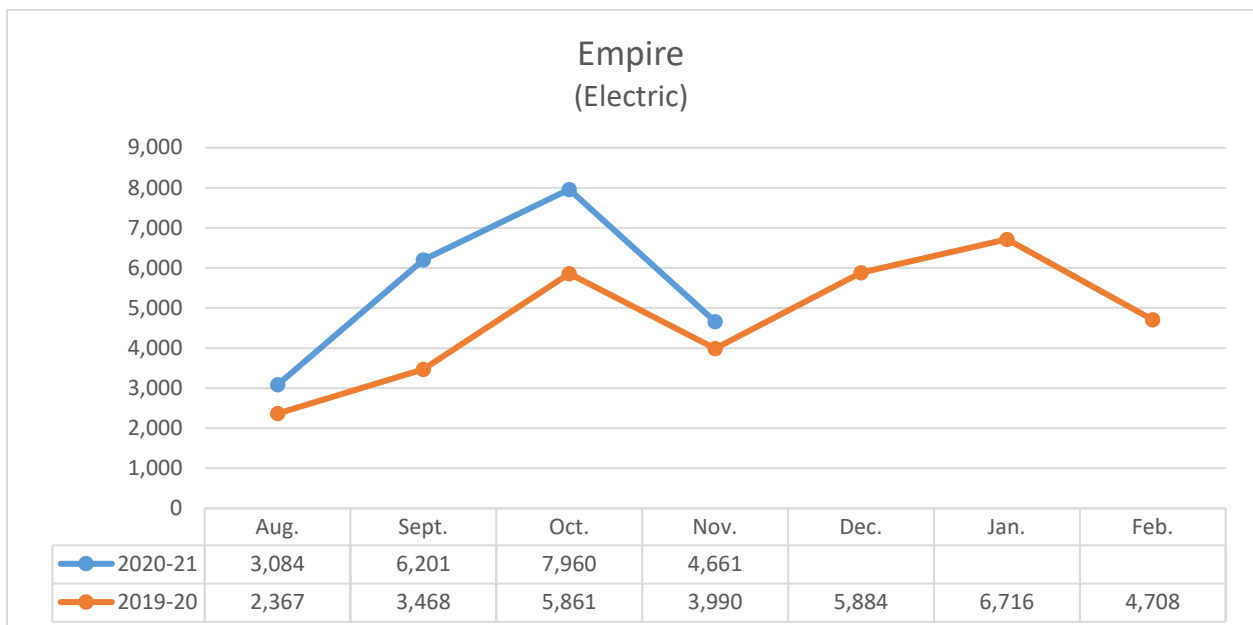
The previous data indicates that there were about 17% more Empire customers with past-due accounts in November 2020 versus November 2019 and approximately 26% fewer in November 2020 than in October 2020. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement due date.

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



As shown by Empire’s data, for those customers who received a final disconnection notice there were about 16% more customers who were not disconnected in November 2020 versus November 2019 and approximately 26% fewer in November 2020 than in October 2020.

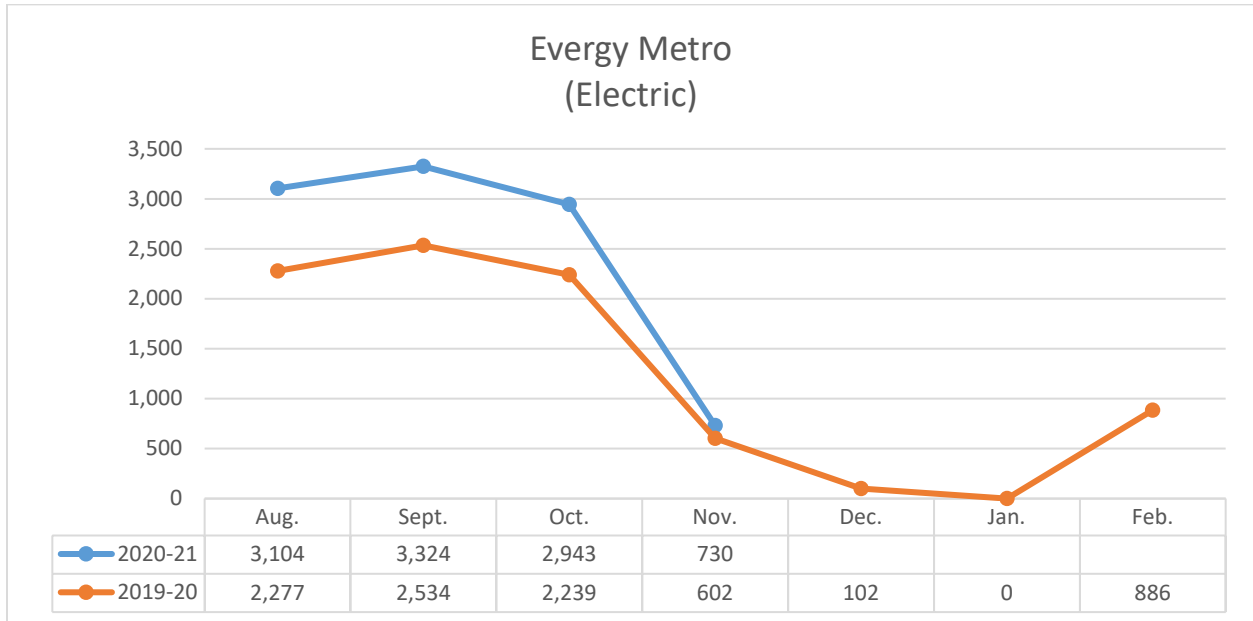
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 17% more Empire customers who participated in payment plans in November 2020 versus November 2019 and about 41% fewer in November 2020 than in October 2020.

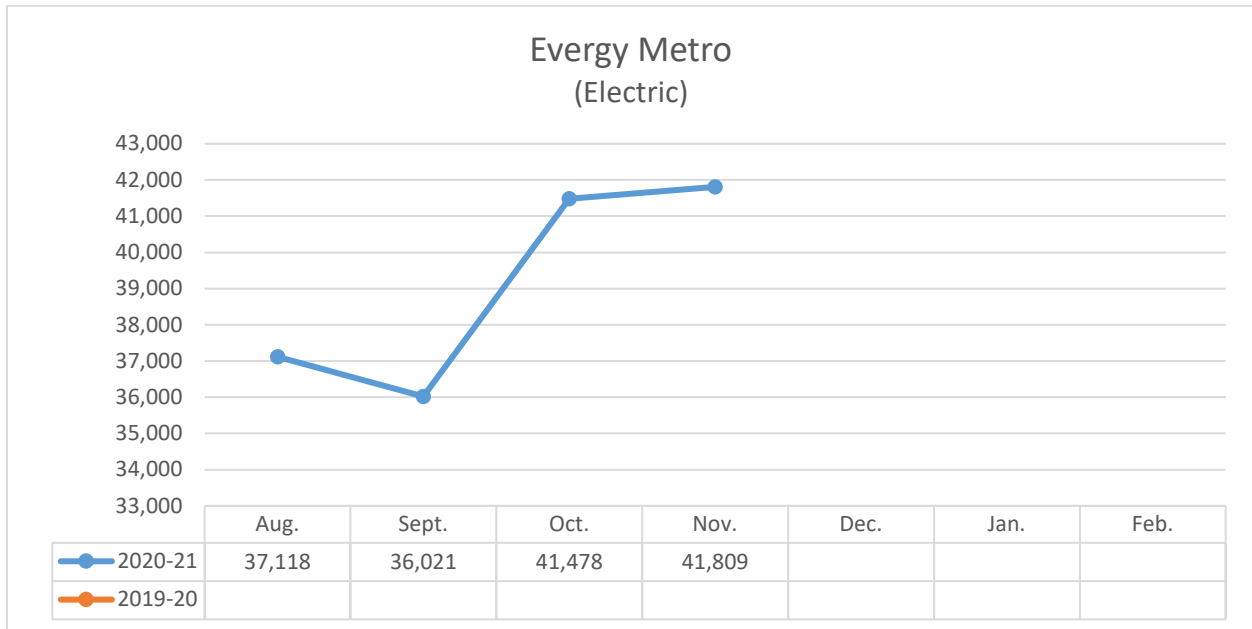
Questions 1 & 3 (Evergy Metro – Electric)

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



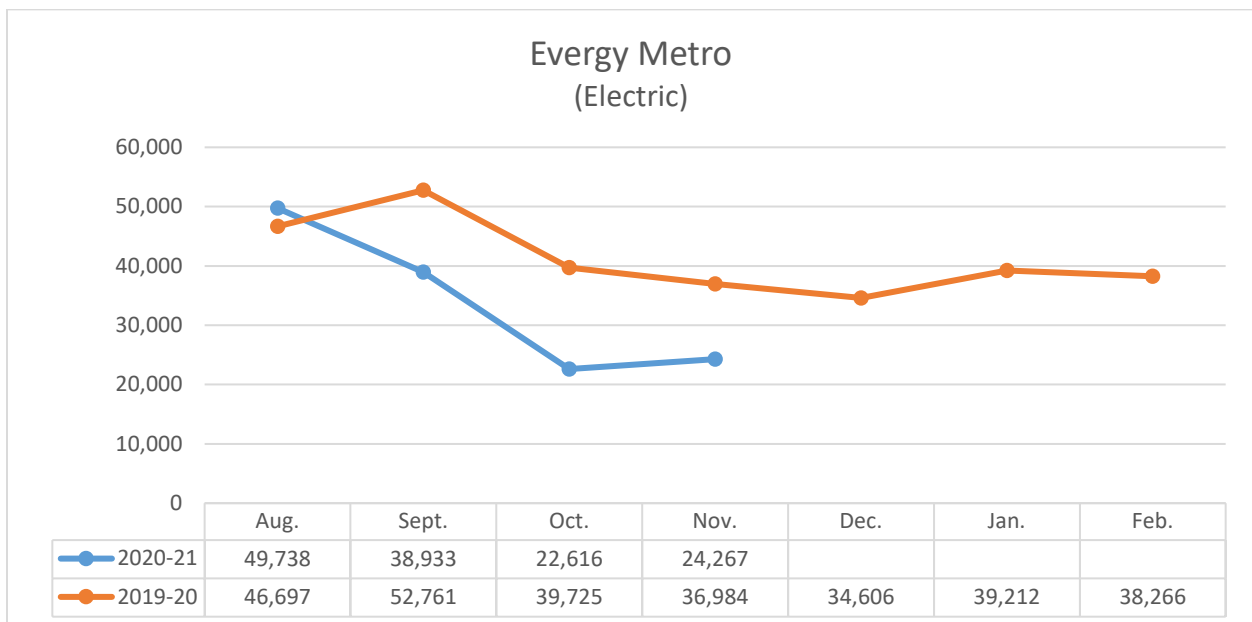
As shown in the previous graph, Evergy Metro performed approximately 21% more disconnections for non-payment in November 2020 versus November 2019 and about 75% less in November 2020 than in October 2020. The number of actual disconnections by Evergy Metro in November 2020 was approximately 11% above the number projected by Evergy Metro for the same month.

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



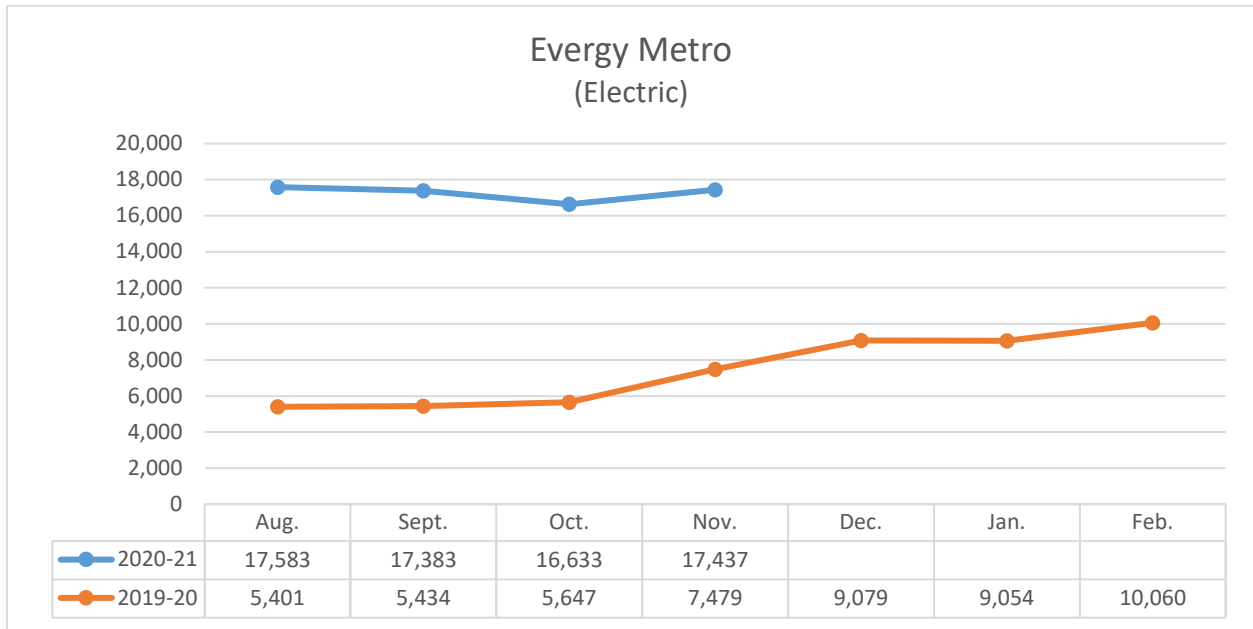
The previous data indicates that there were about 1% more Evergy Metro customers with past-due accounts in November 2020 versus October 2020. Evergy Metro indicated it is unable to provide comparable past-due data for August 2019 to February 2020. Evergy Metro defines past-due accounts as accounts that are more than 30 days in arrears.

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



As shown by Evergy Metro’s data, for those customers who received a final disconnection notice there were about 34% fewer customers who were not disconnected in November 2020 versus November 2019 and approximately 7% more in November 2020 than in October 2020.

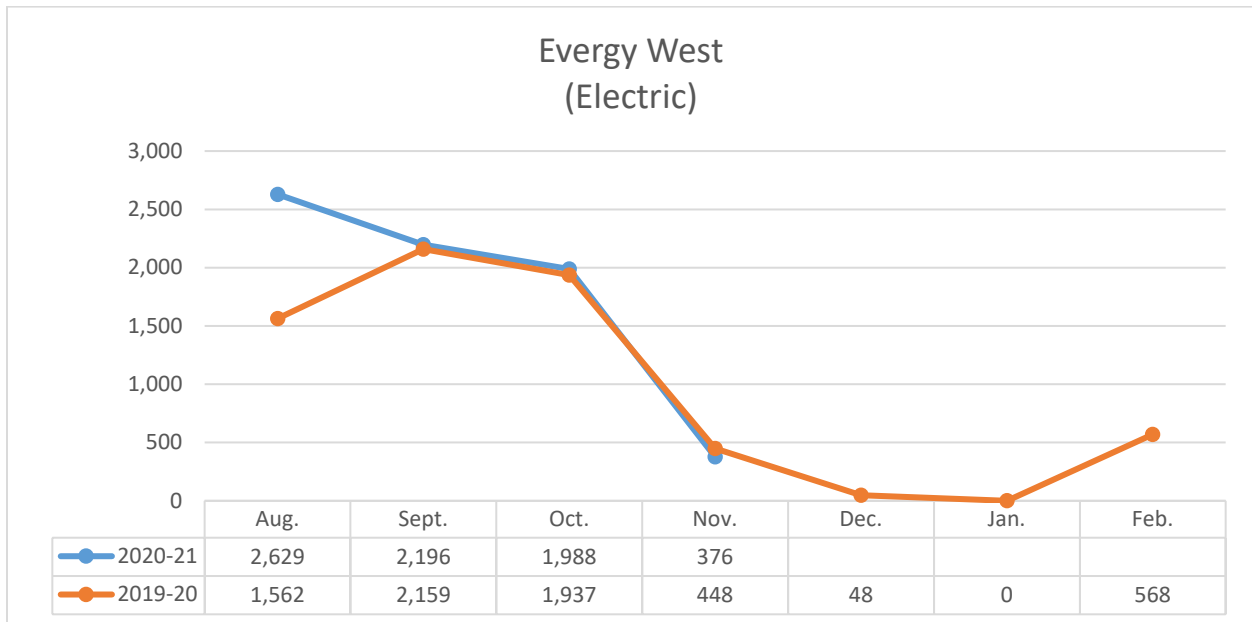
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 133% more Evergy Metro customers who participated in payment plans in November 2020 versus November 2019 and about 5% more in November 2020 than in October 2020.

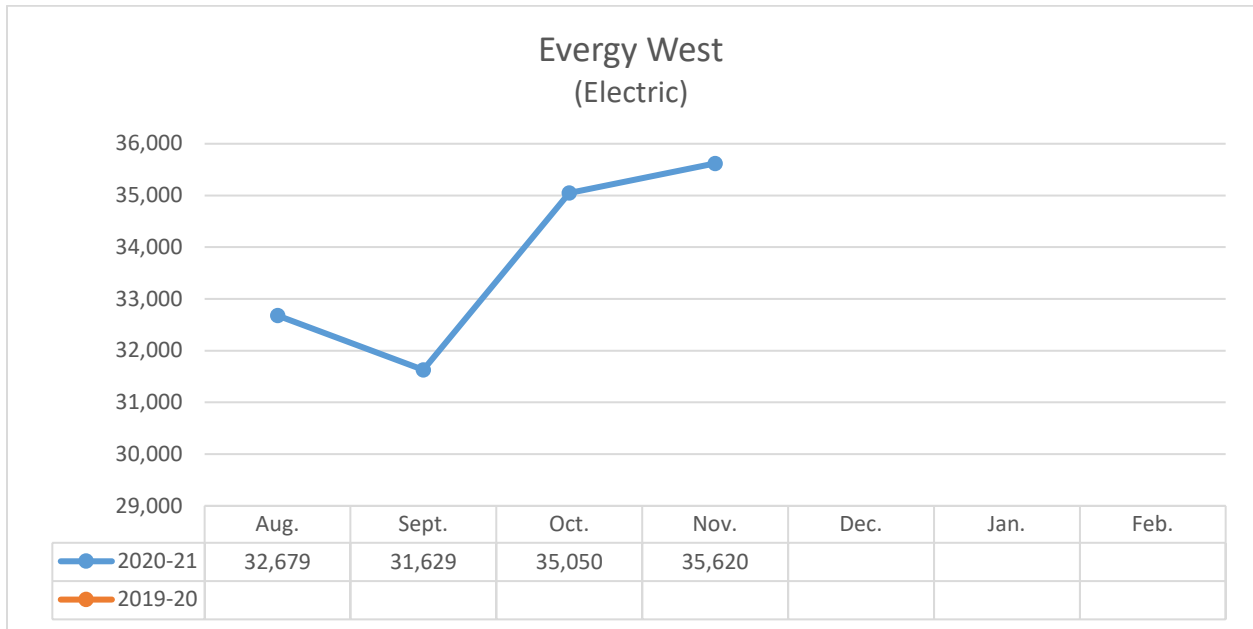
Questions 1 & 3 (Evergy West – Electric)

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



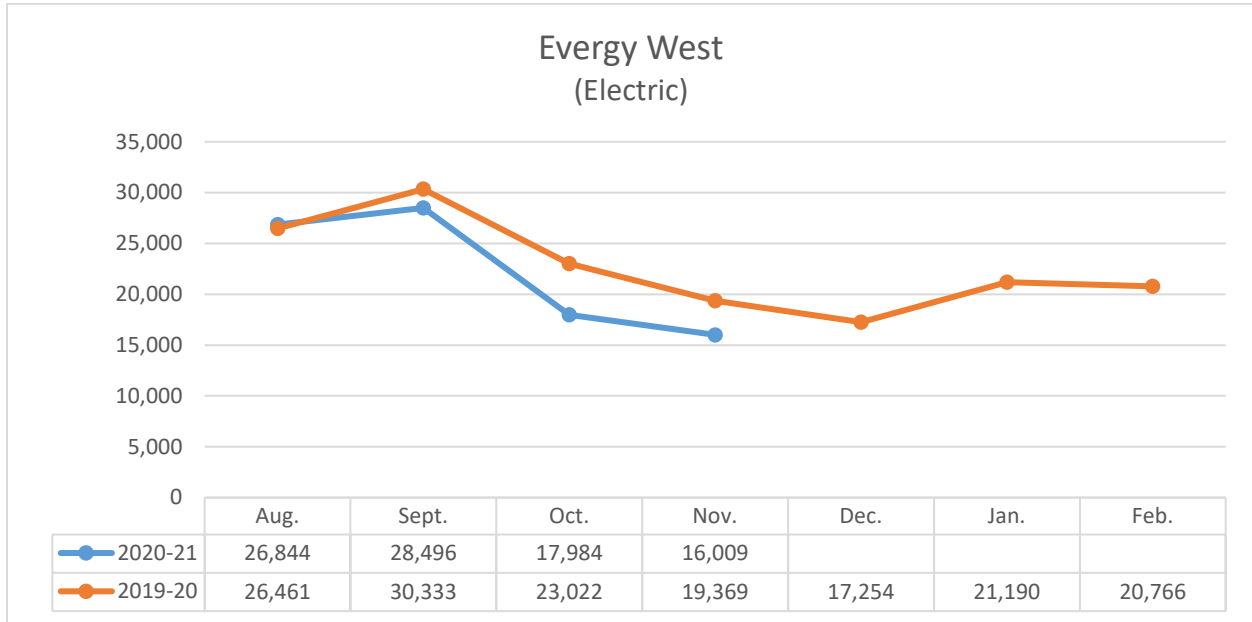
As shown in the previous graph, Evergy West performed approximately 16% fewer disconnections for non-payment in November 2020 versus November 2019 and about 81% fewer in November 2020 than in October 2020. The number of actual disconnections by Evergy West in November 2020 was approximately 15% below the number projected by Evergy West for the same month.

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



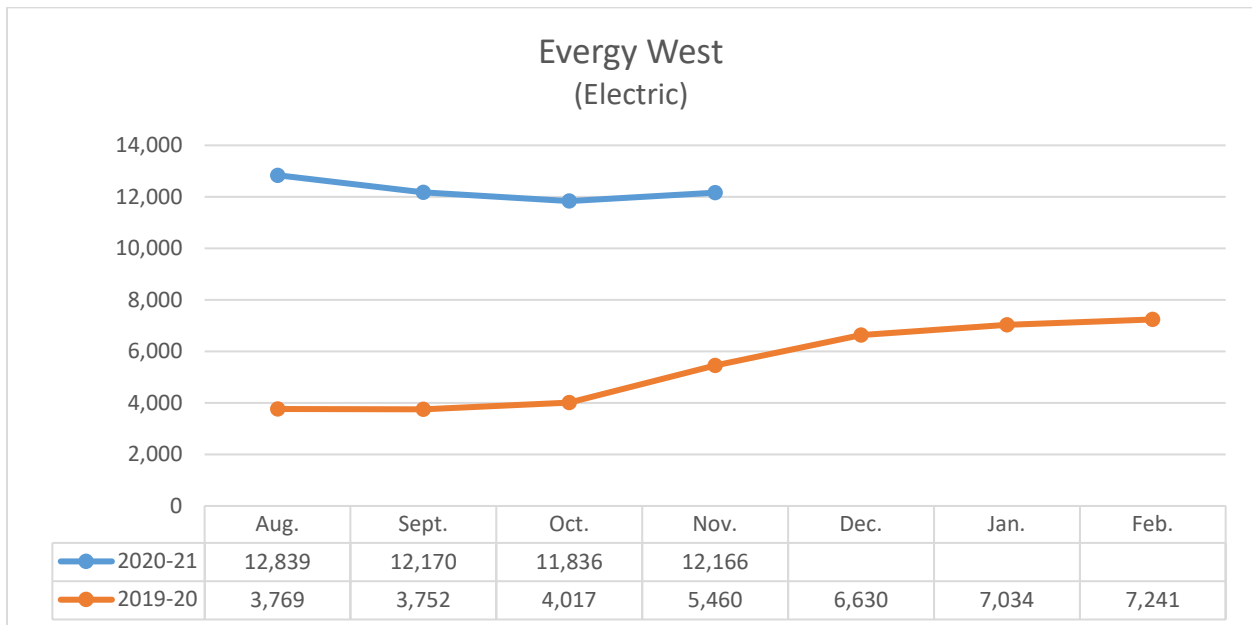
The previous data indicates that there were about 2% more Evergy West customers with past-due accounts in November 2020 versus October 2020. Evergy West indicated it is unable to provide comparable past-due data for August 2019 to February 2020. Evergy West defines past-due accounts as accounts that are more than 30 days in arrears.

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



As shown by Evergy West’s data, for those customers who received a final disconnection notice there were about 17% fewer customers who were not disconnected in November 2020 versus November 2019 and approximately 11% less in November 2020 than in October 2020.

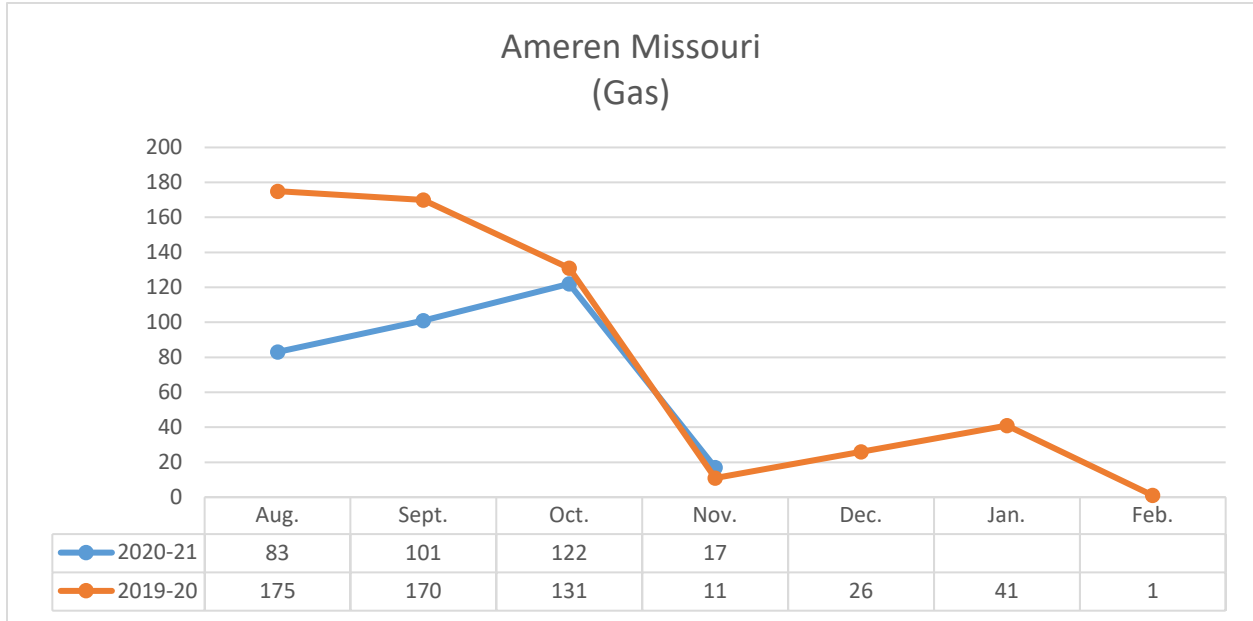
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 123% more Evergy West customers who participated in payment plans in November 2020 versus November 2019 and about 3% more in November 2020 than in October 2020.

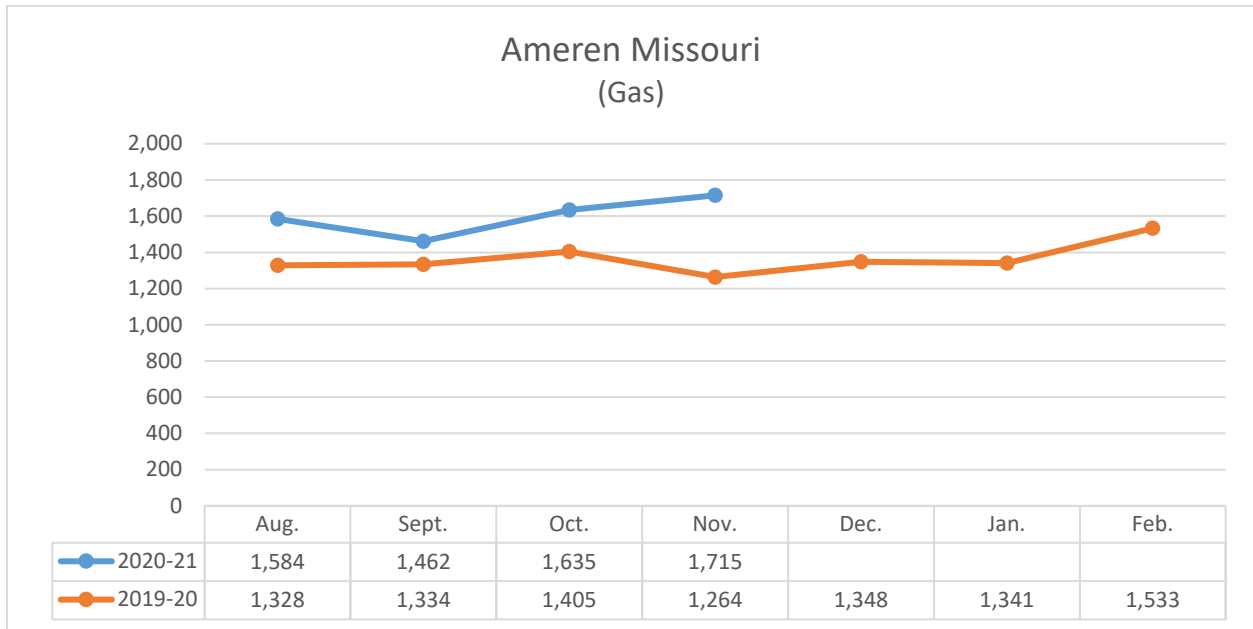
Questions 1 & 3 (Ameren Missouri – Gas)

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



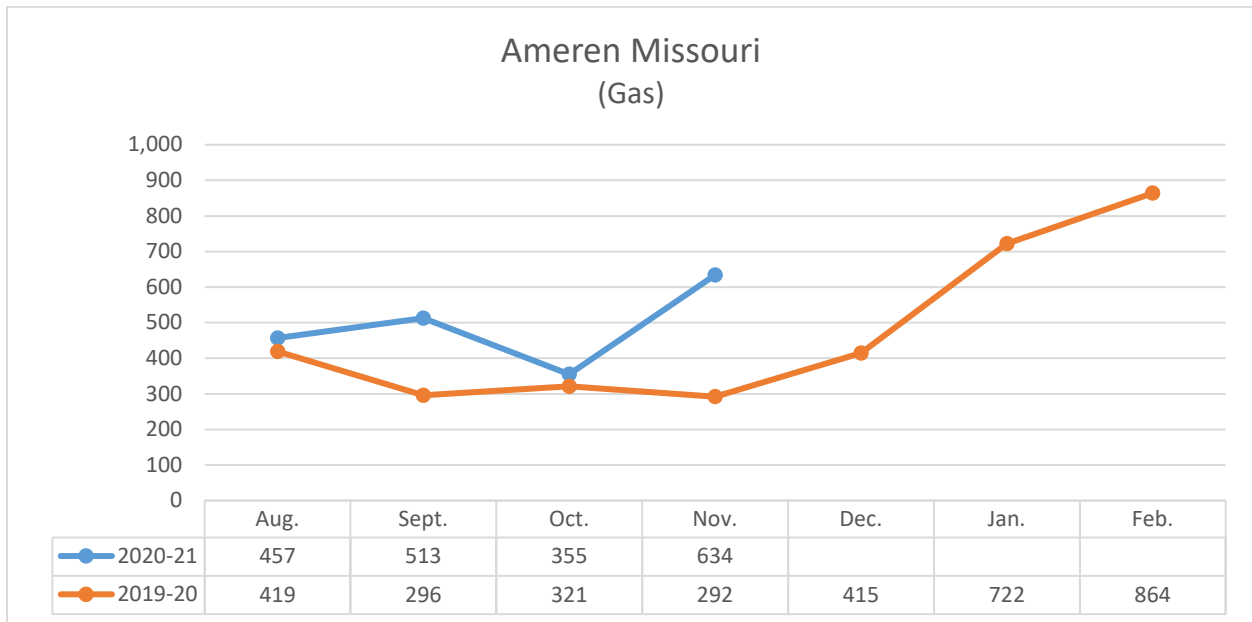
As shown in the previous graph, Ameren Missouri performed approximately 55% more disconnections for non-payment in November 2020 versus November 2019 and about 86% fewer in November 2020 than in October 2020. The number of actual disconnections by Ameren Missouri in November 2020 was approximately 13% above the number projected by Ameren Missouri for the same month.

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



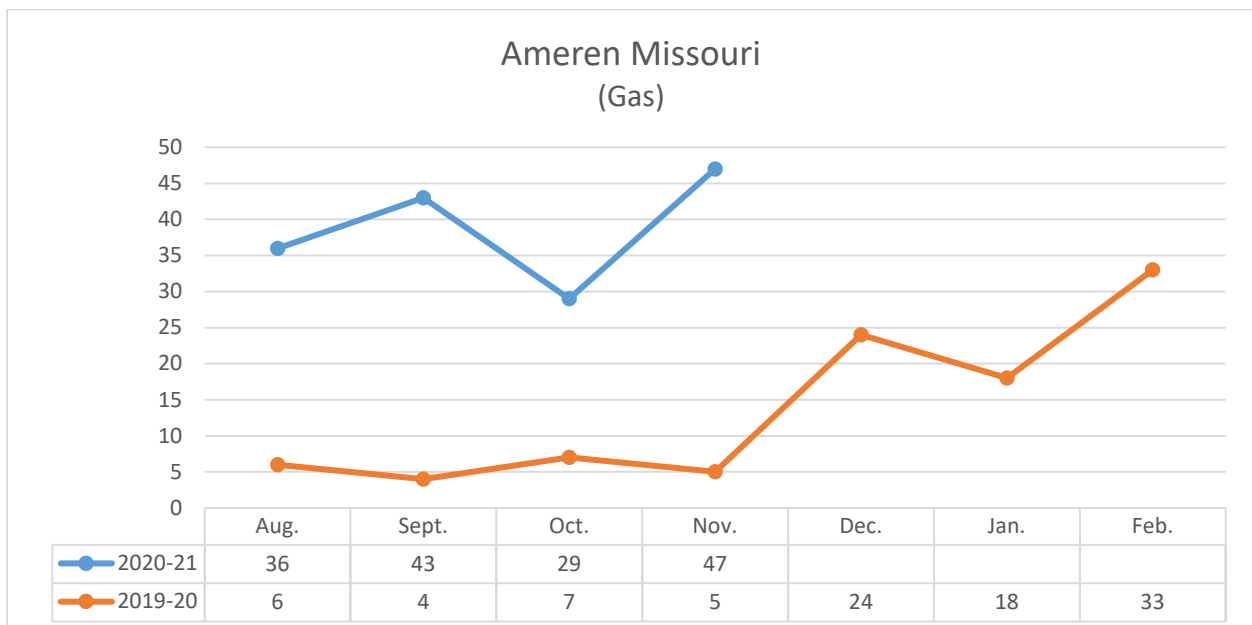
The previous data indicates that there were about 36% more Ameren Missouri customers with past-due accounts in November 2020 versus November 2019 and about 5% more in November 2020 than in October 2020. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

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



As shown by Ameren Missouri’s data, for those customers who received a final disconnection notice there were about 117% more customers who were not disconnected in November 2020 versus November 2019 and about 79% more in November 2020 than in October 2020.

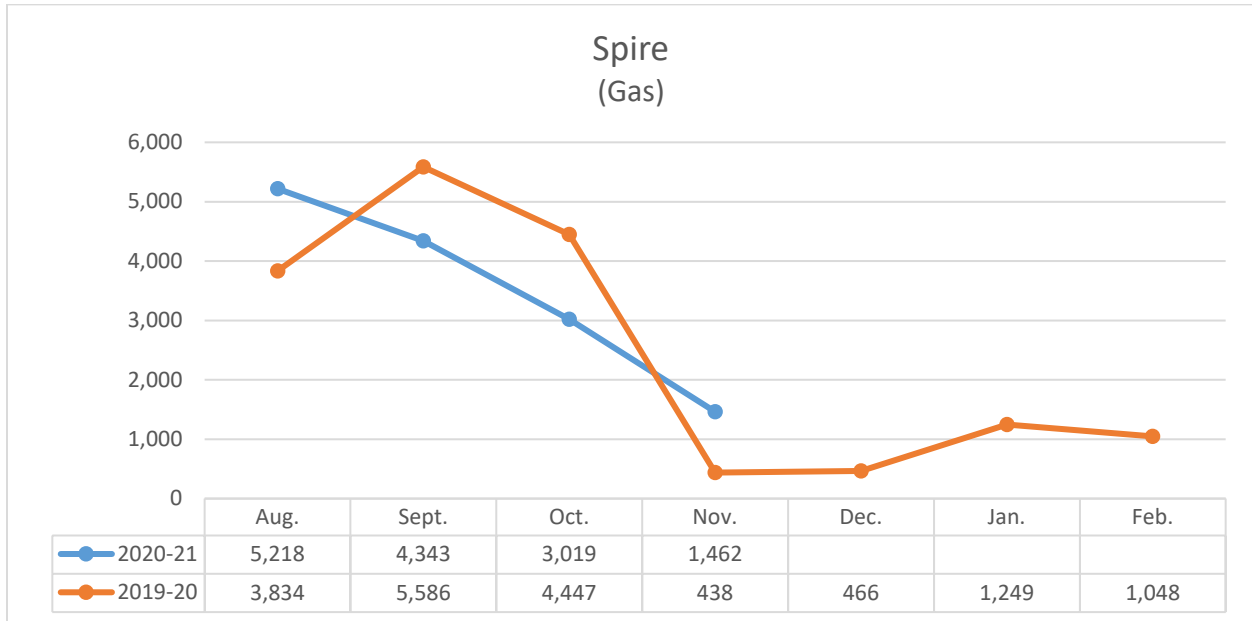
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 840% more Ameren Missouri customers who participated in payment plans in November 2020 versus November 2019 and about 62% more in November 2020 than in October 2020.

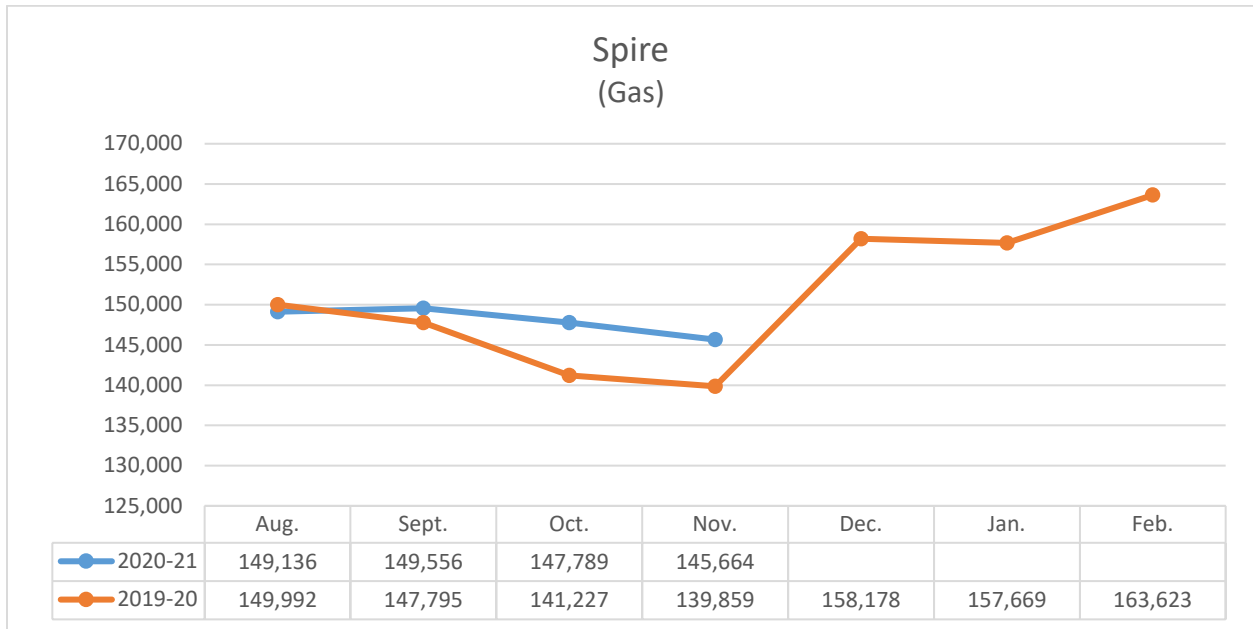
Questions 1 & 3 (Spire - Gas)

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



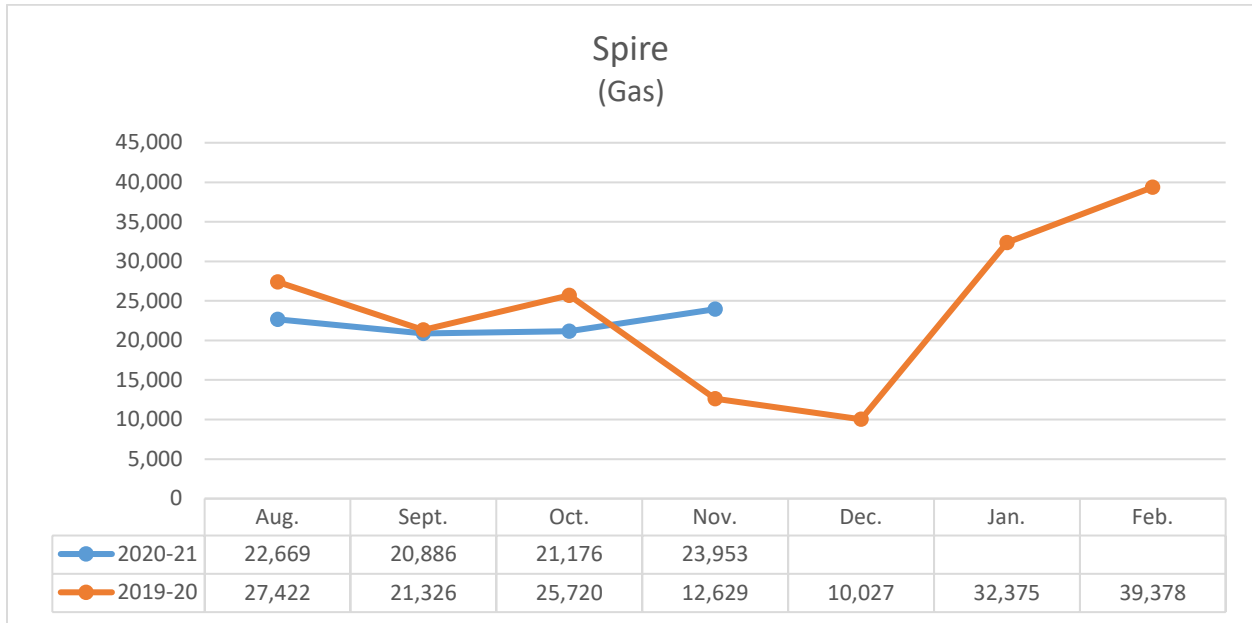
As shown in the previous graph, Spire performed approximately 234% more disconnections for non-payment in November 2020 versus November 2019 and approximately 52% less in November 2020 than in October 2020. The number of actual disconnections by Spire in November 2020 was approximately 34% above the number projected by Spire for the same month.

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



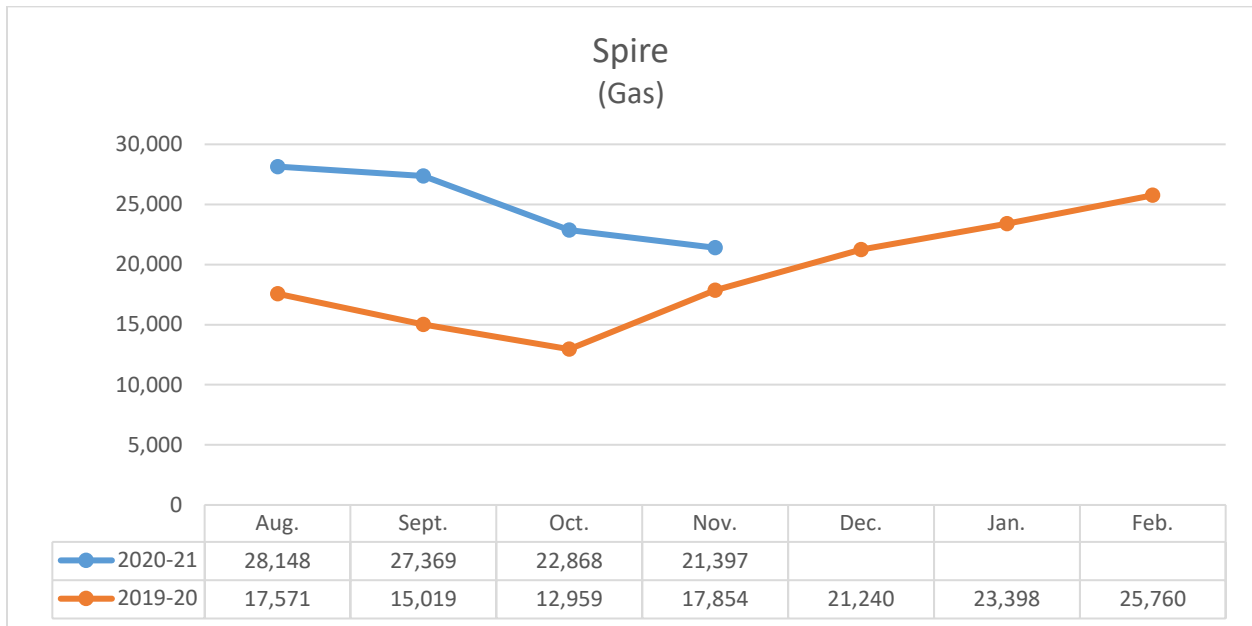
The previous data indicates that there were about 4% more Spire customers with past-due accounts in November 2020 versus November 2019 and approximately 1% fewer in November 2020 than in October 2020. Spire reported that past-due accounts are defined as accounts with arrear amounts owed for over 30 days that were not final billed at month’s end.

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



As shown by Spire’s data, for those customers who received a final disconnection notice there were about 90% more customers who were not disconnected in November 2020 versus November 2019 and approximately 13% more in November 2020 than in October 2020.

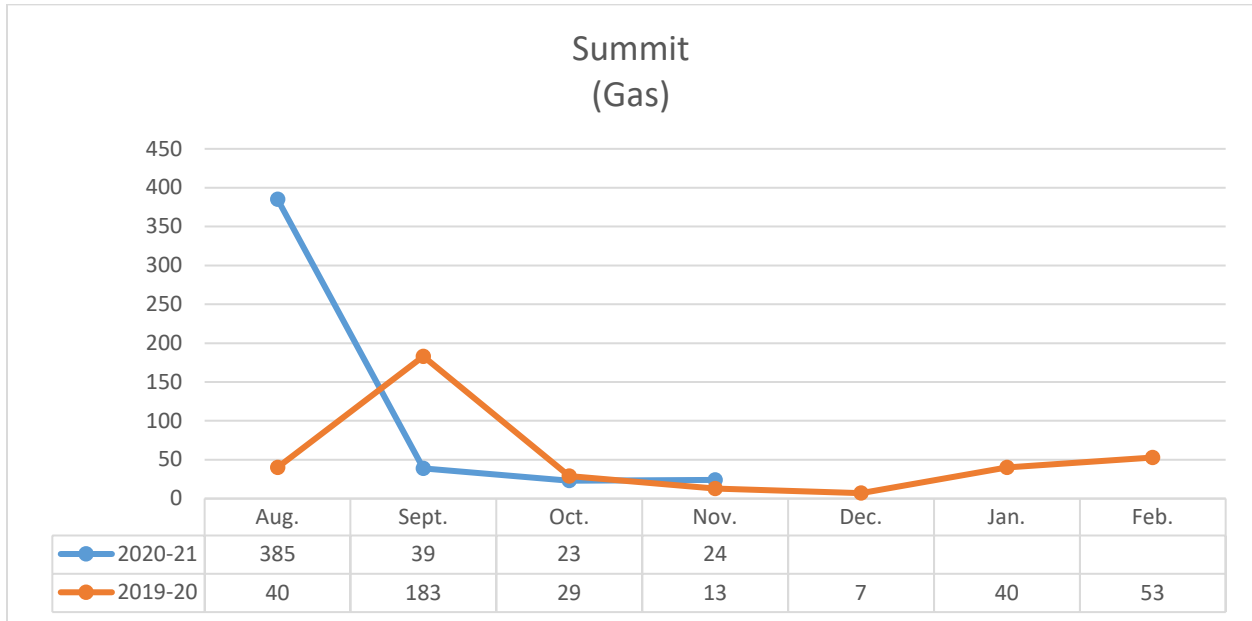
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 20% more Spire customers who participated in payment plans in November 2020 versus November 2019 and about 6% less in November 2020 than in October 2020.

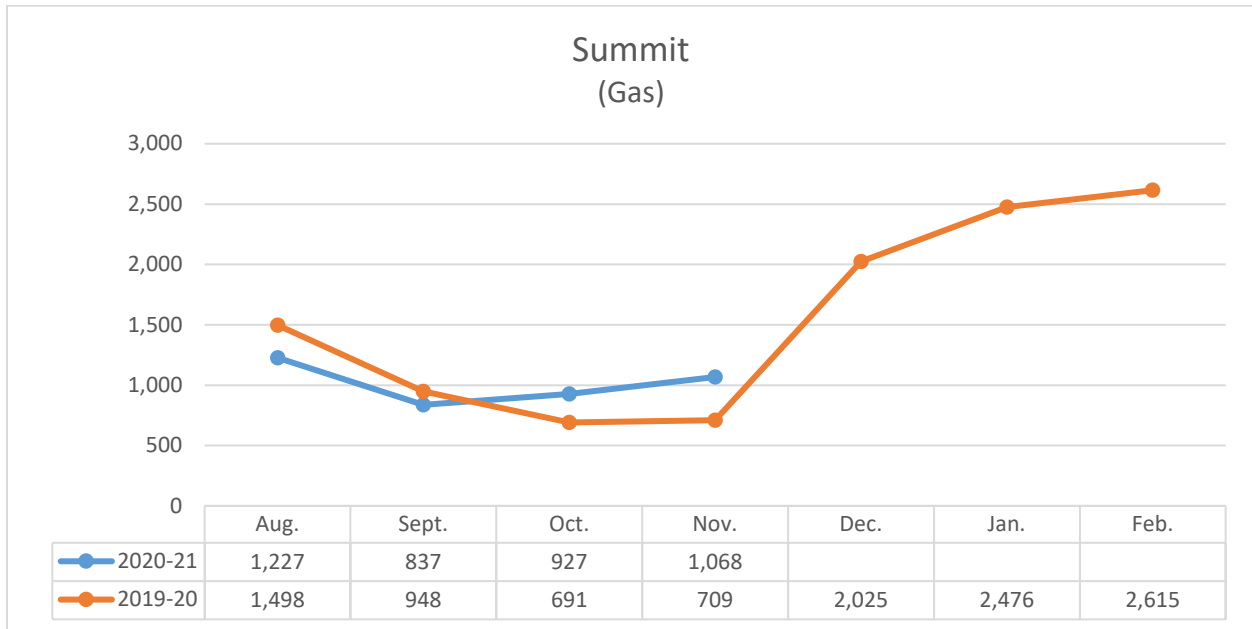
Questions 1 & 3 (Summit - Gas)

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



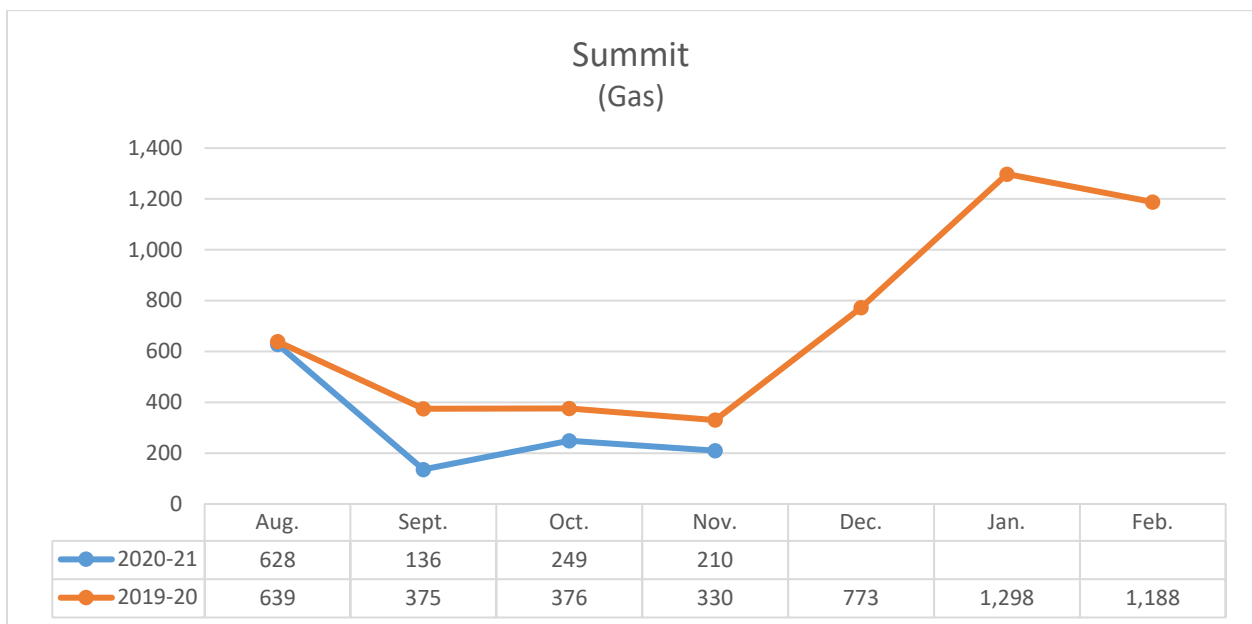
As shown in the previous graph, Summit performed approximately 85% more disconnections for non-payment in November 2020 versus November 2019 and about 4% more in November 2020 than in October 2020. The number of actual disconnections by Summit in November 2020 was approximately 85% above the number projected by Summit for the same month.

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



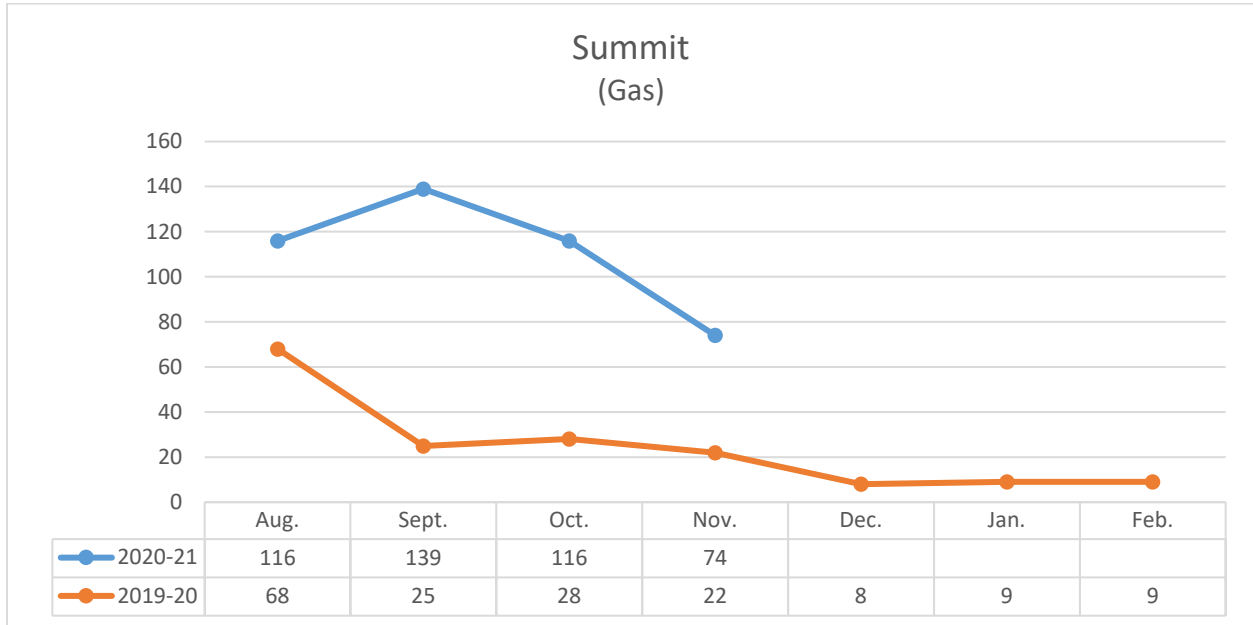
The previous data indicates that there were about 51% more Summit customers with past-due accounts in November 2020 versus November 2019 and approximately 15% more in November 2020 than in October 2020. Summit did not respond how it defines past-due accounts.

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



As shown by Summit’s data, for those customers who received a final disconnection notice there were about 36% fewer customers who were not disconnected in November 2020 versus November 2019 and approximately 16% less in November 2020 than in October 2020.

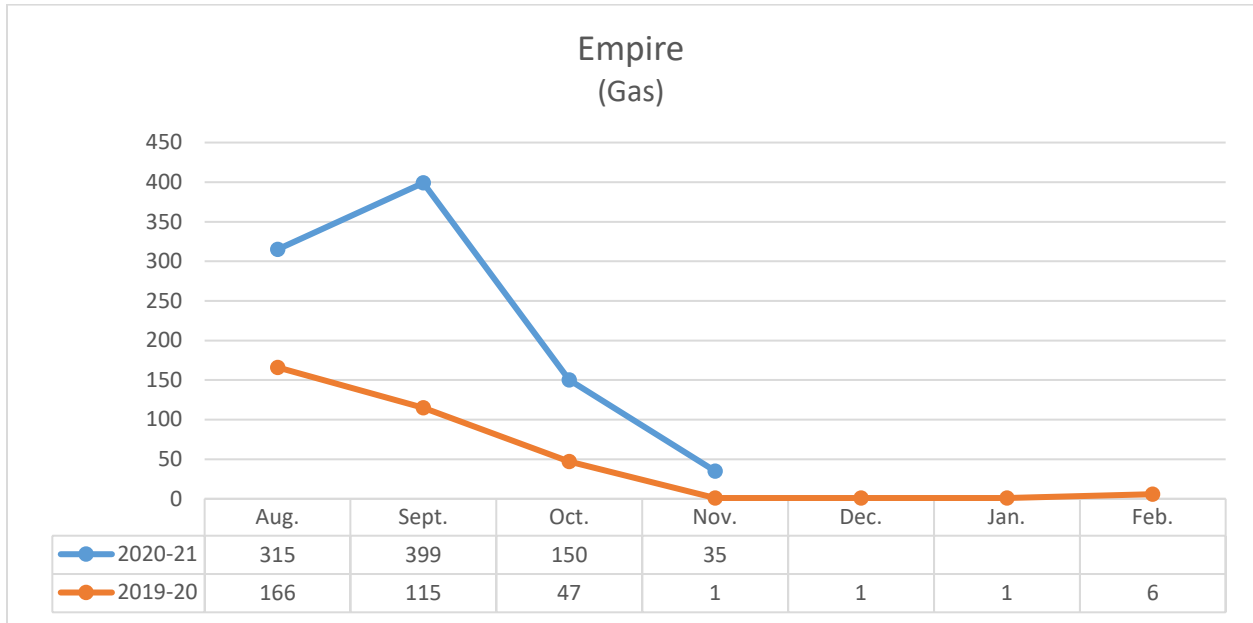
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 236% more Summit customers who participated in payment plans in November 2020 versus November 2019 and about 36% fewer in November 2020 than in October 2020.

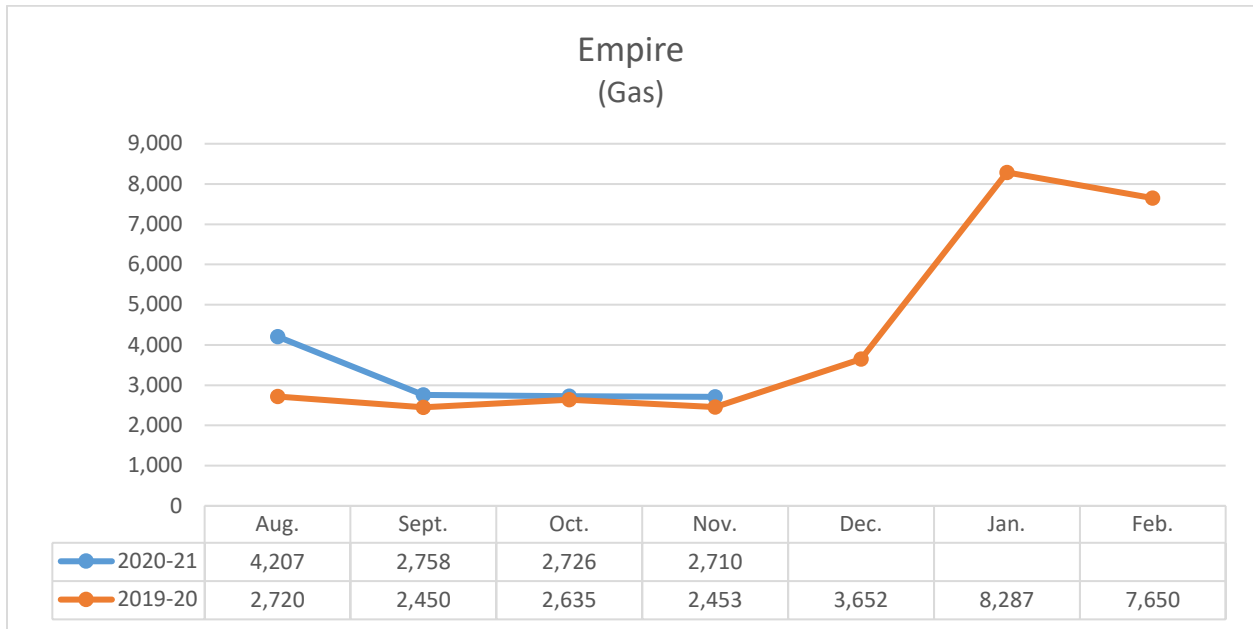
Questions 1 & 3 (Empire - Gas)

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



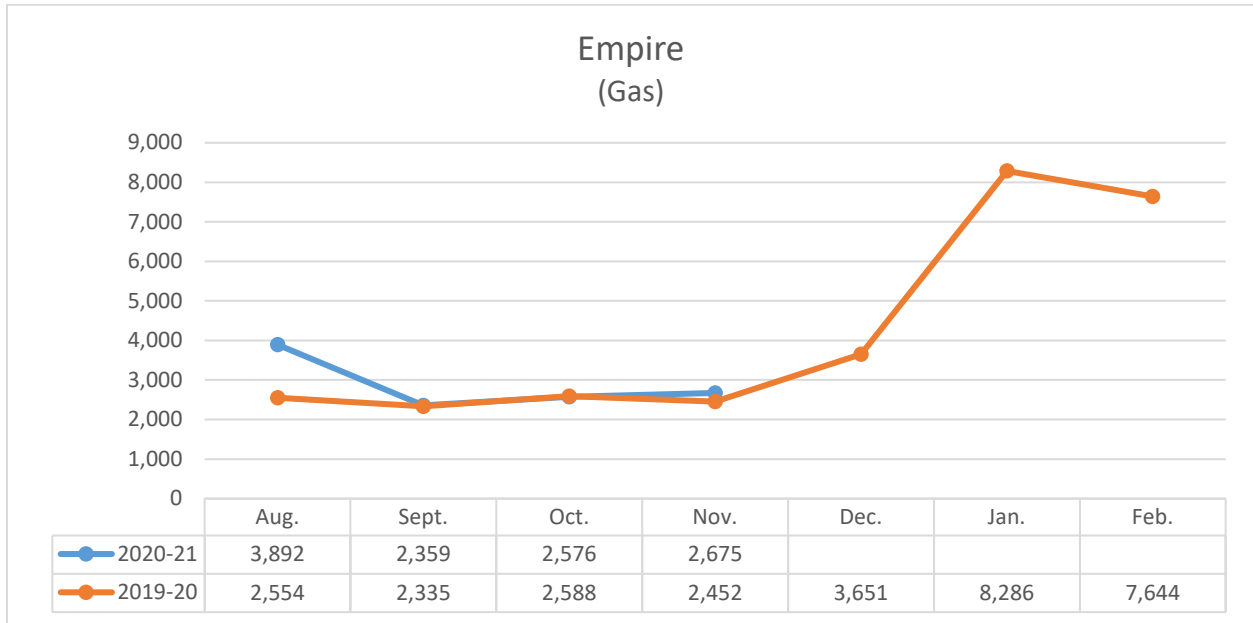
As shown in the previous graph, Empire performed approximately 3,400% more disconnections for non-payment in November 2020 versus November 2019 and about 77% fewer in November 2020 than in October 2020. The number of actual disconnections by Empire in November 2020 was approximately 30% below the number projected by Empire for the same month.

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



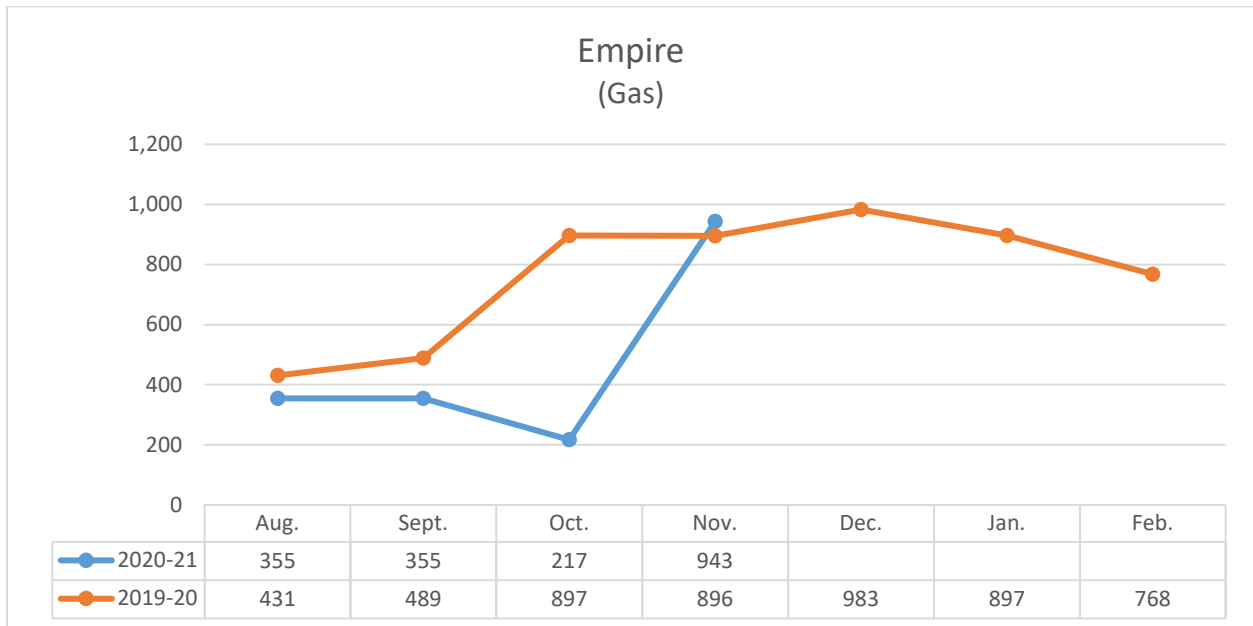
The previous data indicates that there were about 10% more Empire customers with past-due accounts in November 2020 versus November 2019 and approximately 1% fewer in November 2020 than in October 2020. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement due date.

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



As shown by Empire’s data, for those customers who received a final disconnection notice there were about 9% more customers who were not disconnected in November 2020 versus November 2019 and approximately 4% more in November 2020 than in October 2020.

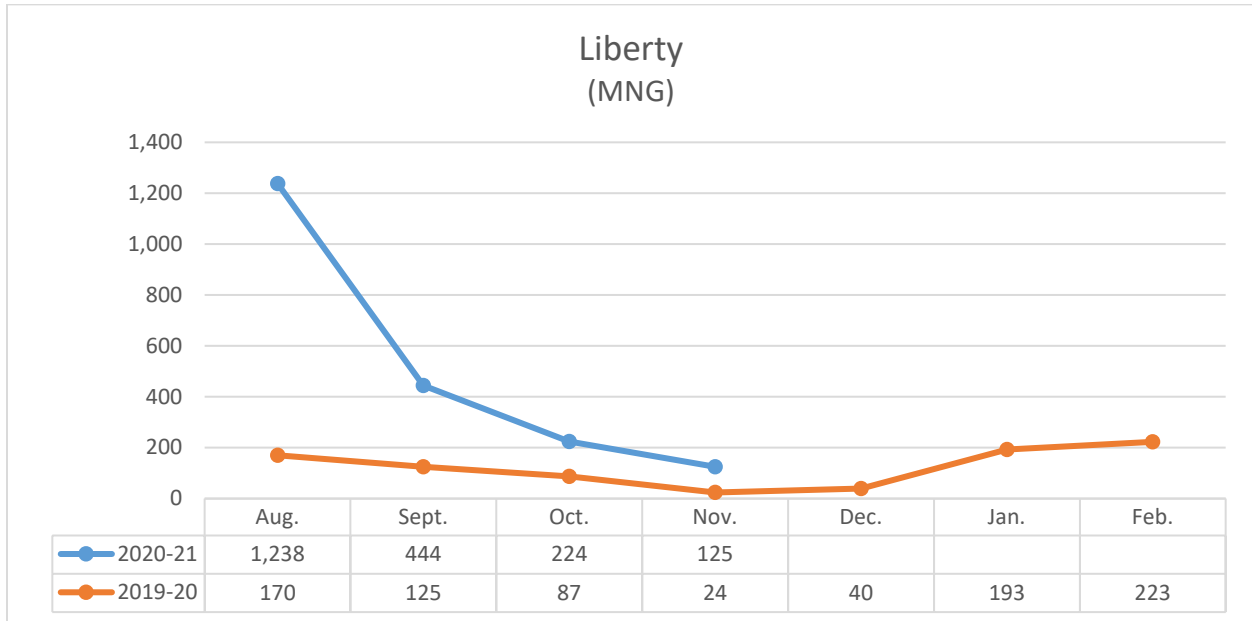
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 5% more Empire customers who participated in payment plans in November 2020 versus November 2019 and about 335% more in November 2020 than in October 2020.

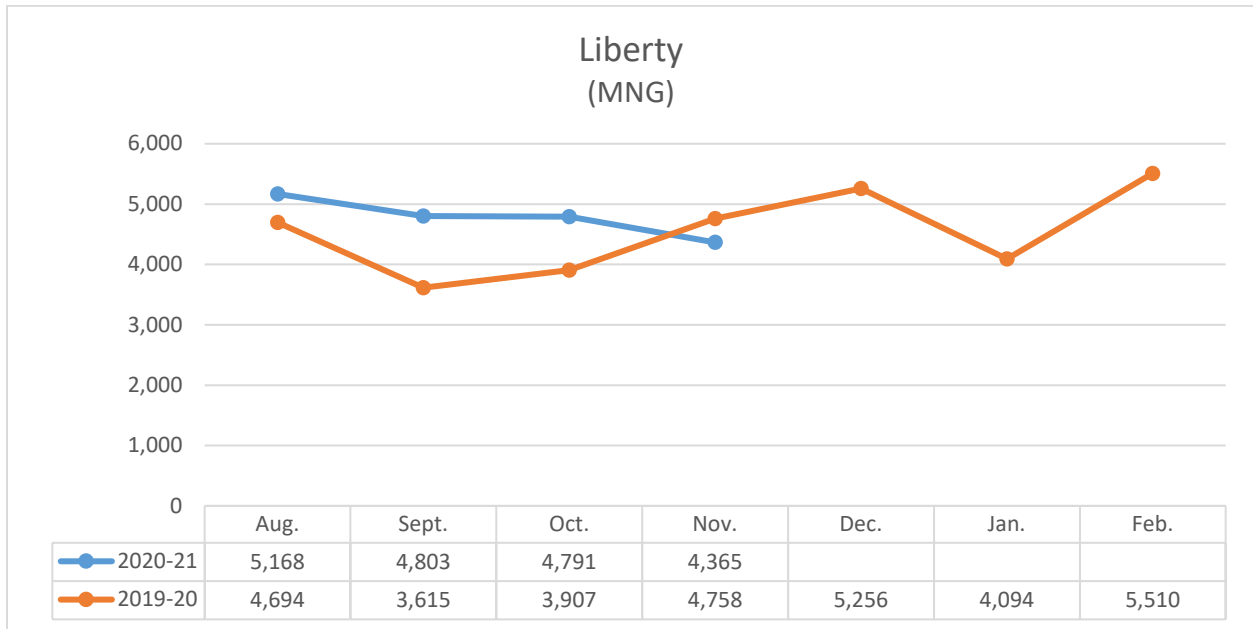
Questions 1 & 3 (Liberty - MNG - Gas)

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



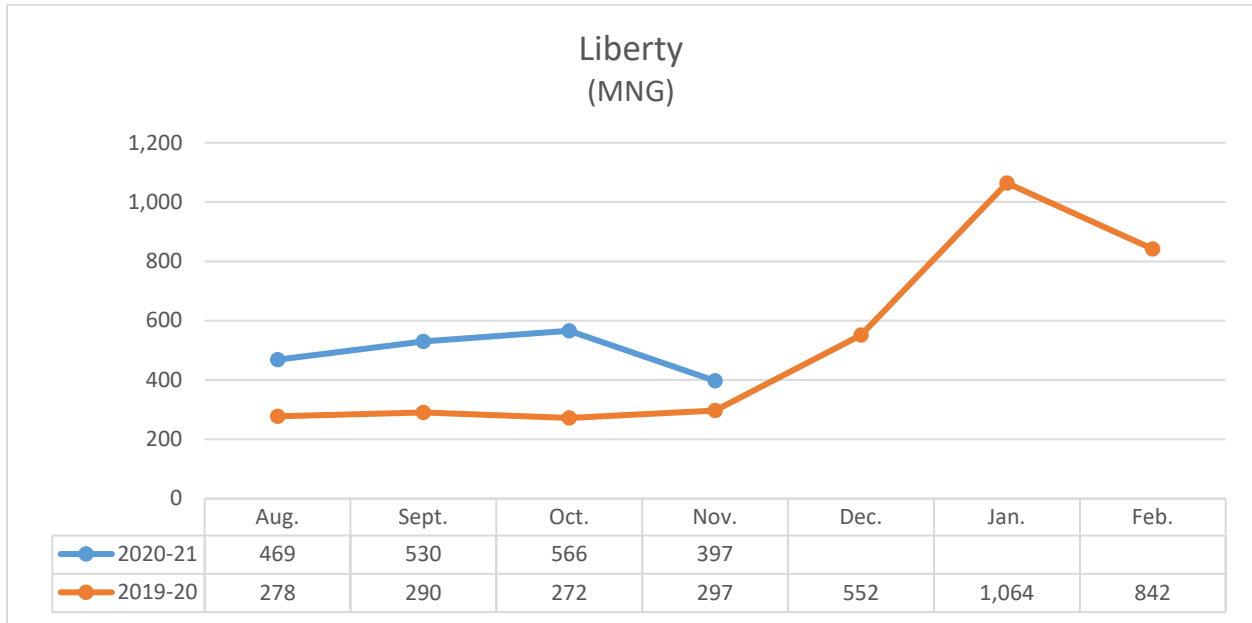
As shown in the previous graph, Liberty (MNG) performed approximately 421% more disconnections for non-payment in November 2020 versus November 2019 and about 44% less in November 2020 than in October 2020. The number of actual disconnections by Liberty (MNG) in November 2020 was approximately 90% below the number projected by Liberty (MNG) for the same month.

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



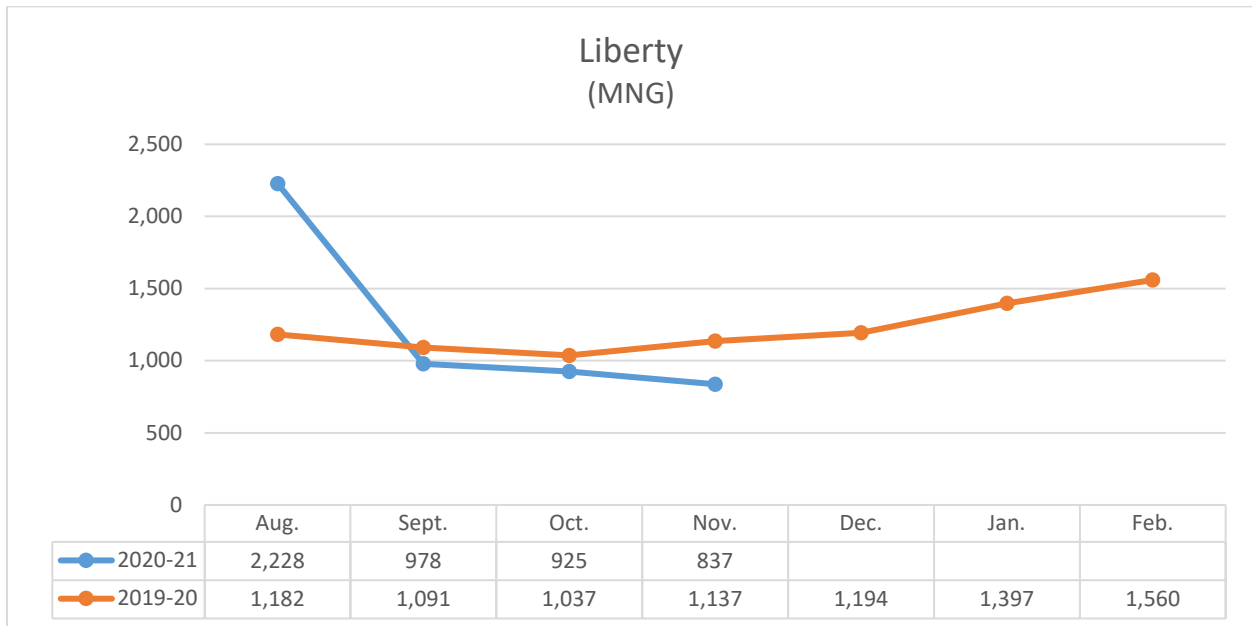
The previous data indicates that there were about 8% fewer Liberty (MNG) customers with past-due accounts in November 2020 versus November 2019 and approximately 9% less in November 2020 than in October 2020. Liberty (MNG) reported that it considers accounts past-due when they have a past-due balance for greater than two days and they are not on budget billing.

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



As shown by Liberty (MNG)'s data, for those customers who received a final disconnection notice there were about 34% more customers who were not disconnected in November 2020 versus November 2019 and approximately 30% fewer in November 2020 than in October 2020.

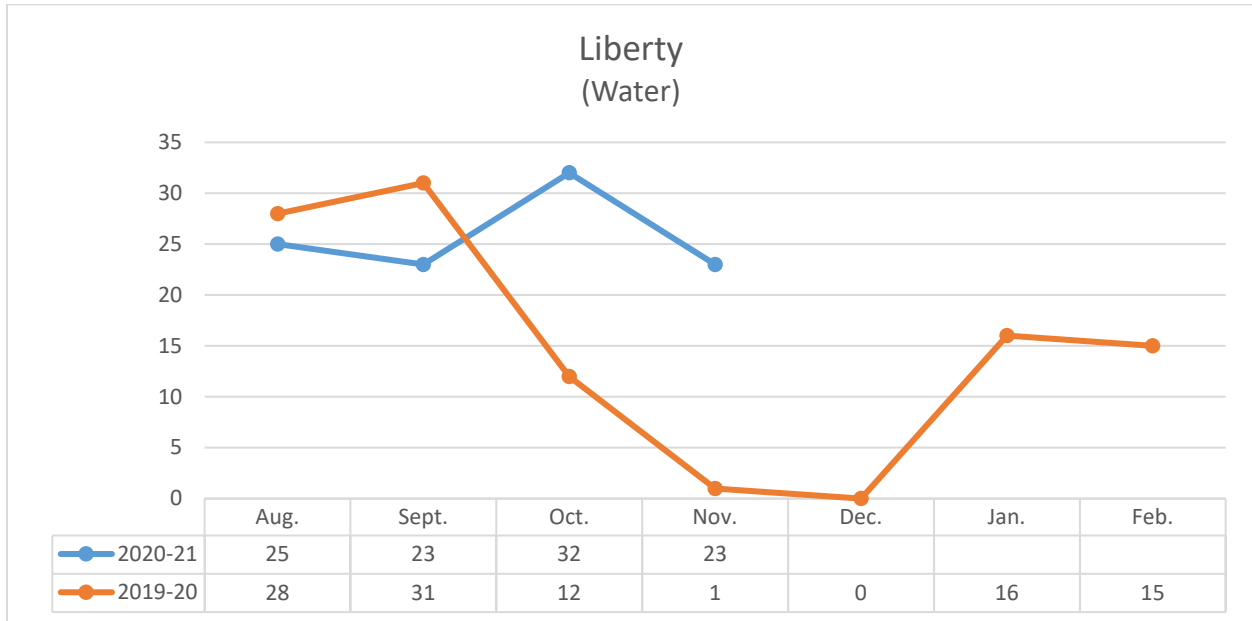
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 26% less Liberty (MNG) customers who participated in payment plans in November 2020 versus November 2019 and 10% less in November 2020 than in October 2020.

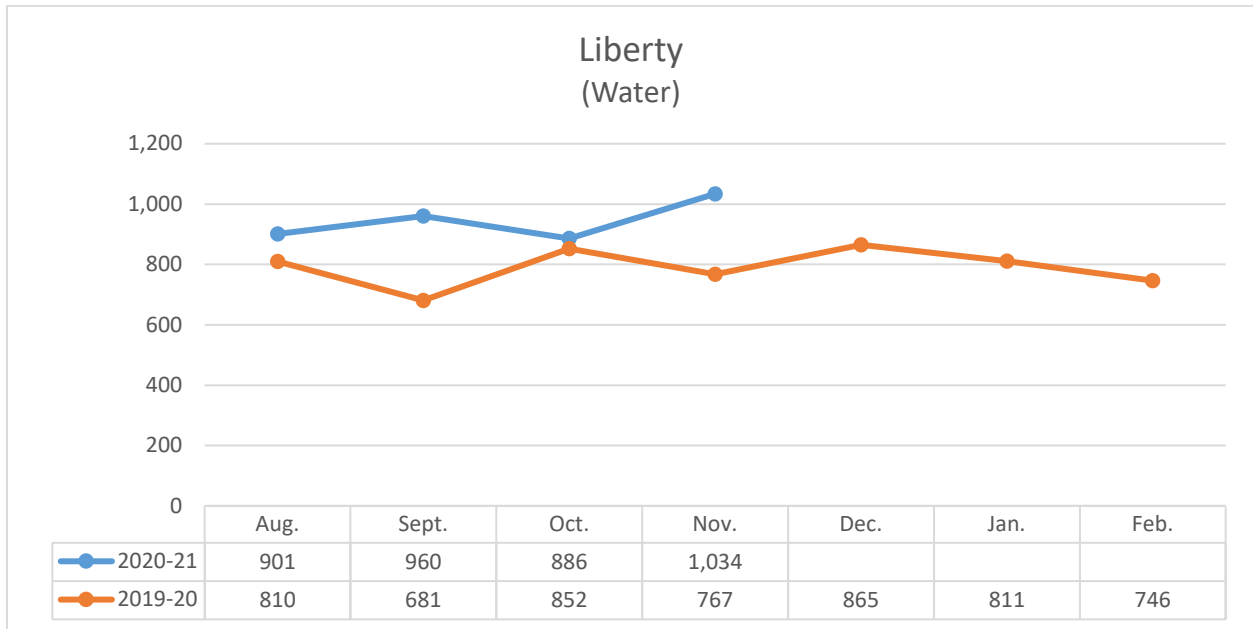
Questions 1 & 3 (Liberty - Water)

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



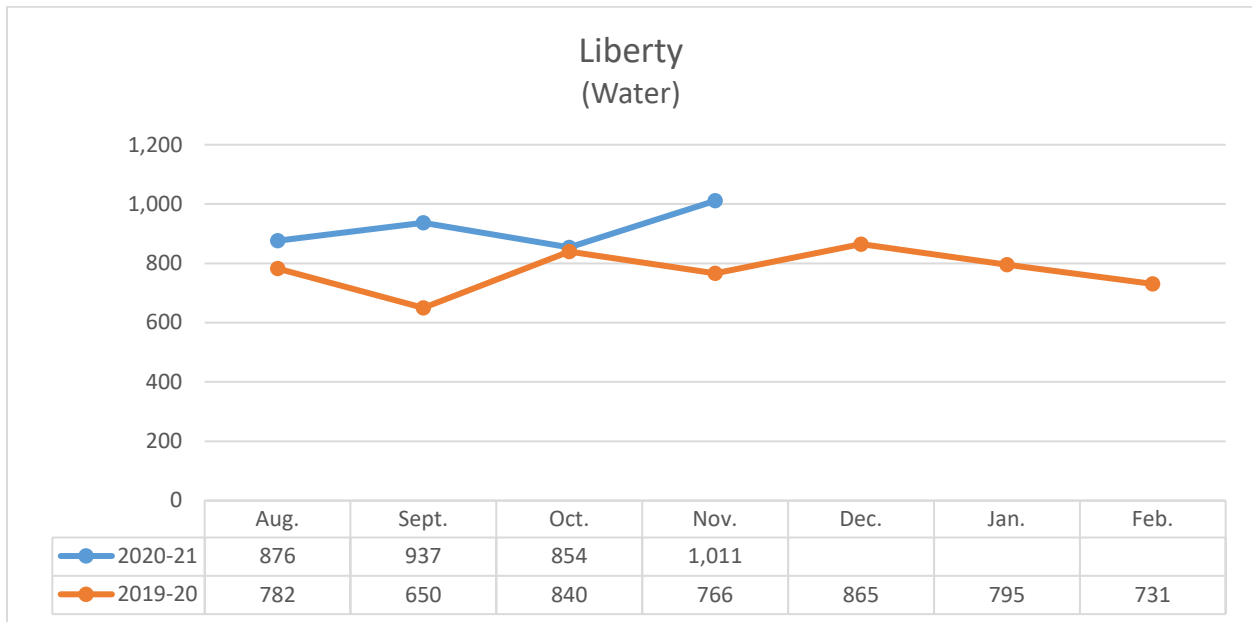
As shown in the previous graph, Liberty performed approximately 2,200% more disconnections for non-payment in November 2020 versus November 2019 and about 28% fewer in November 2020 than in October 2020. The number of actual disconnections by Liberty in November 2020 was approximately 43% below the number projected by Liberty for the same month.

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



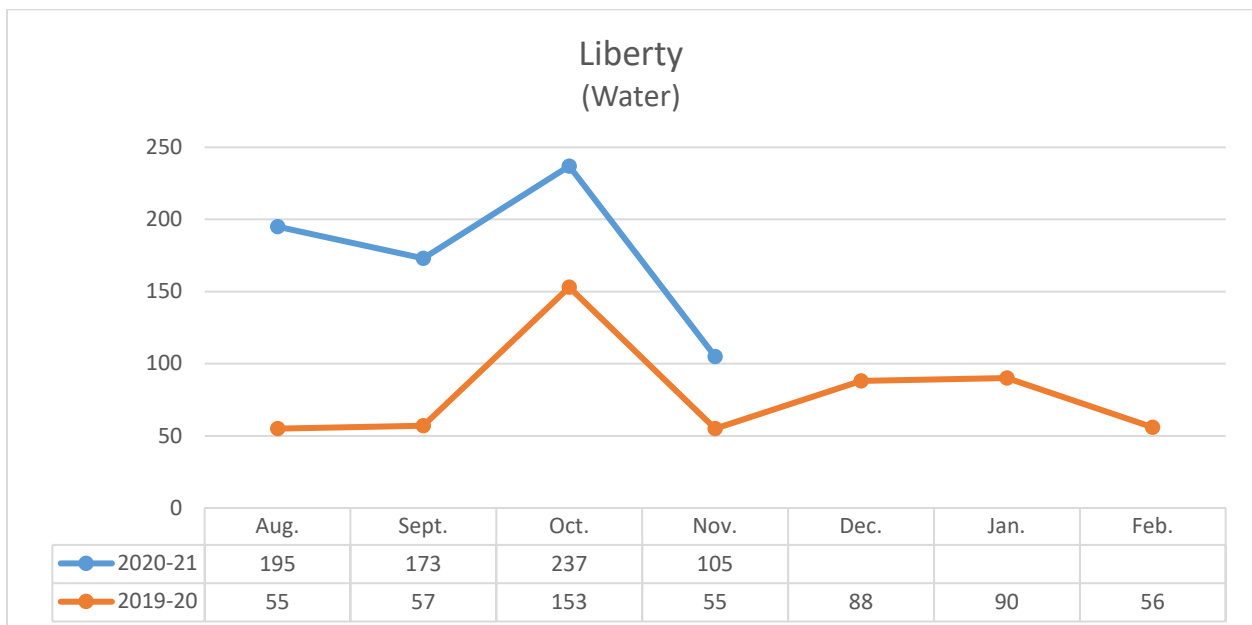
The previous data indicates that there were about 35% more Liberty customers with past-due accounts in November 2020 versus November 2019 and approximately 17% more in November 2020 than in October 2020. Liberty reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement due date.

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



As shown by Liberty’s data, for those customers who received a final disconnection notice there were about 32% more customers who were not disconnected in November 2020 versus November 2019 and approximately 18% more in November 2020 than in October 2020.

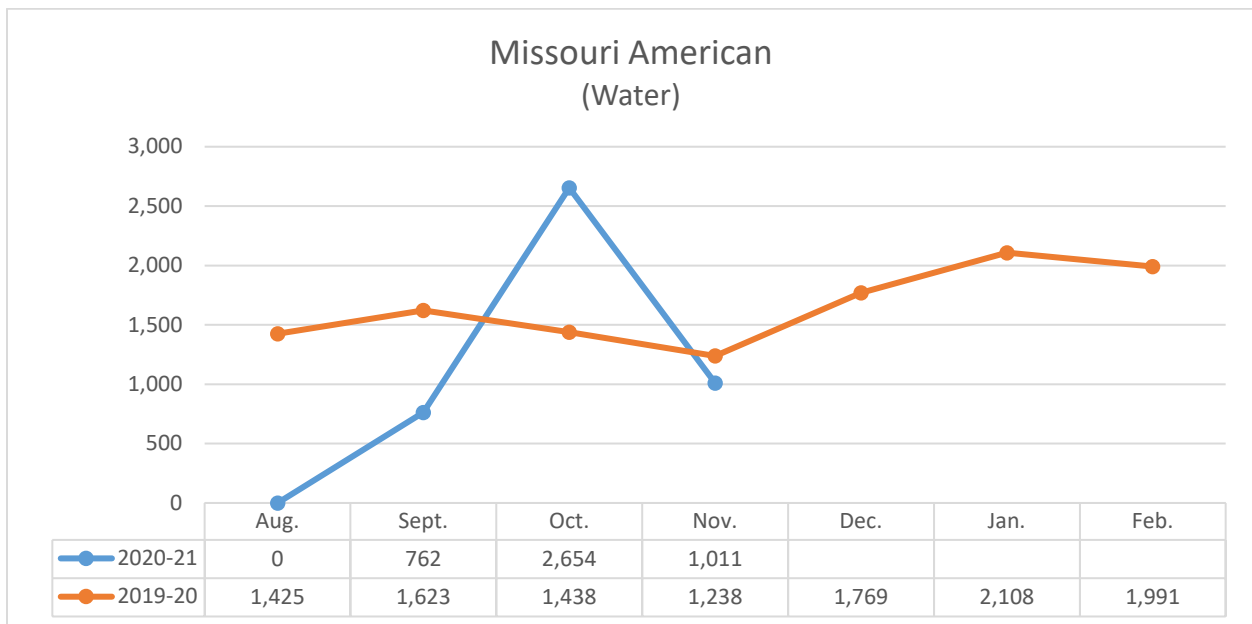
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 91% more Liberty customers who participated in payment plans in November 2020 versus November 2019 and about 56% fewer in November 2020 than in October 2020.

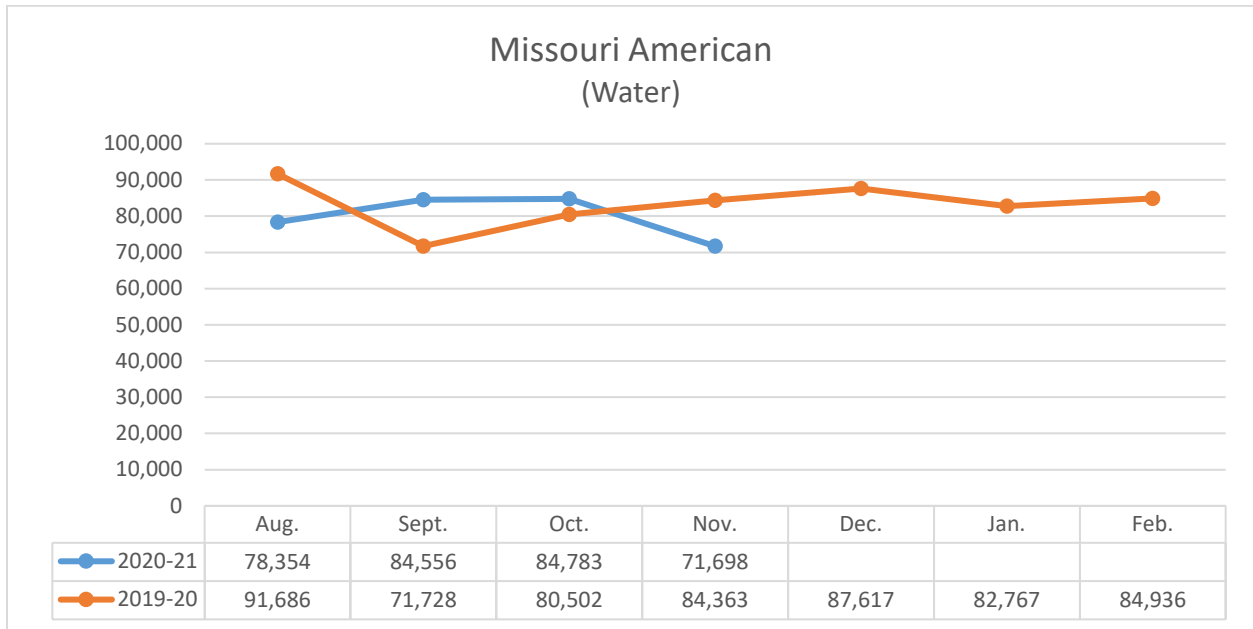
Questions 1 & 3 (Missouri American - Water)

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



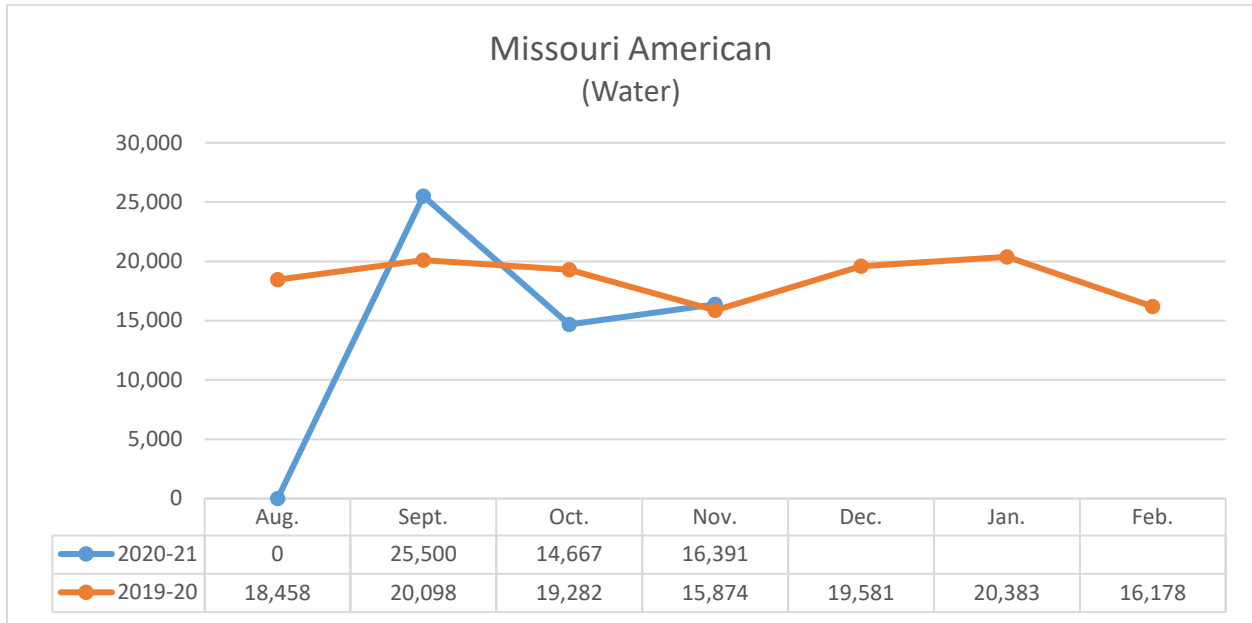
As shown in the previous graph, Missouri American performed approximately 18% fewer disconnections for non-payment in November 2020 versus November 2019 and about 62% less in November 2020 than in October 2020. Missouri American does not forecast the number of disconnections for non-payment.

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



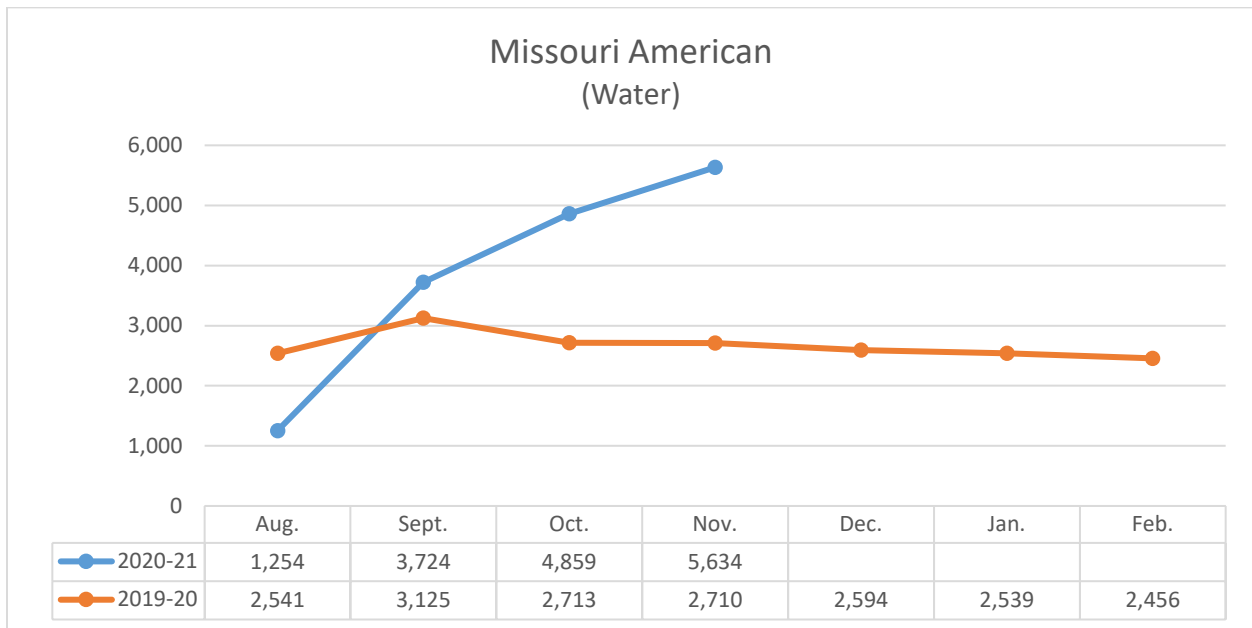
The previous data indicates that there were about 15% fewer Missouri American customers with past-due accounts in November 2020 versus November 2019 and approximately 15% less in November 2020 than in October 2020. Missouri American reported that it defines “past-due” as any unpaid amount past the due date on the customer bill.

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



As shown by Missouri American’s data, for those customers who received a final disconnection notice there were about 3% more customers who were not disconnected in November 2020 versus November 2019 and approximately 12% more in November 2020 than in October 2020.

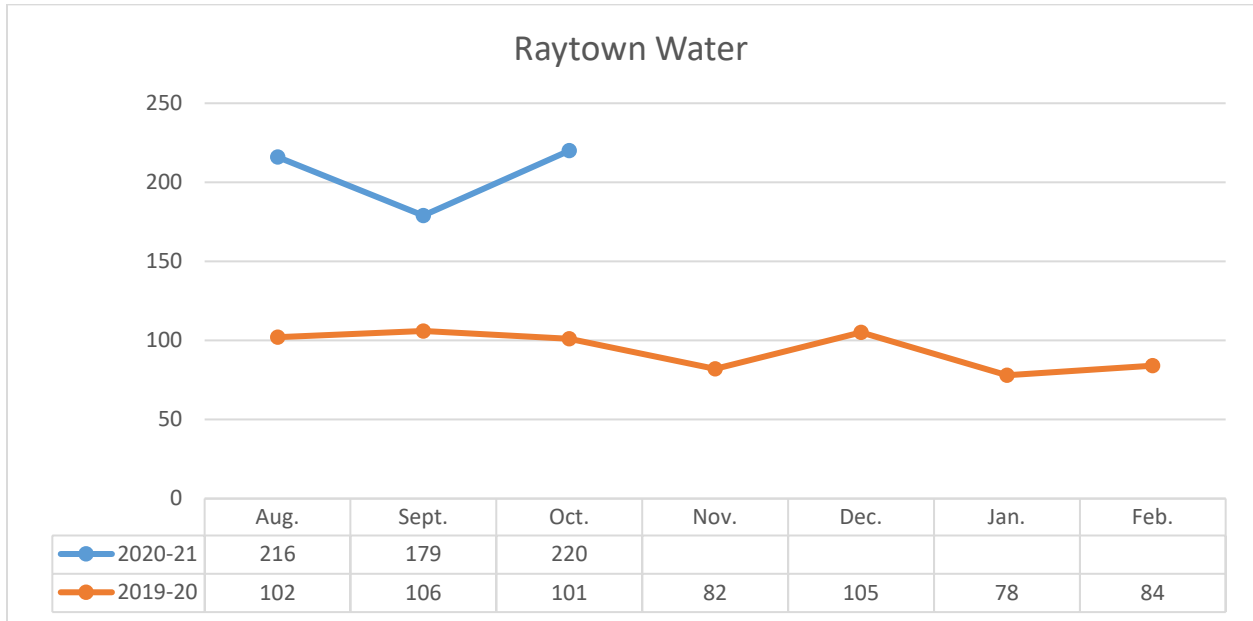
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 108% more Missouri American customers who participated in payment plans in November 2020 versus November 2019 and about 16% more in November 2020 than in October 2020.

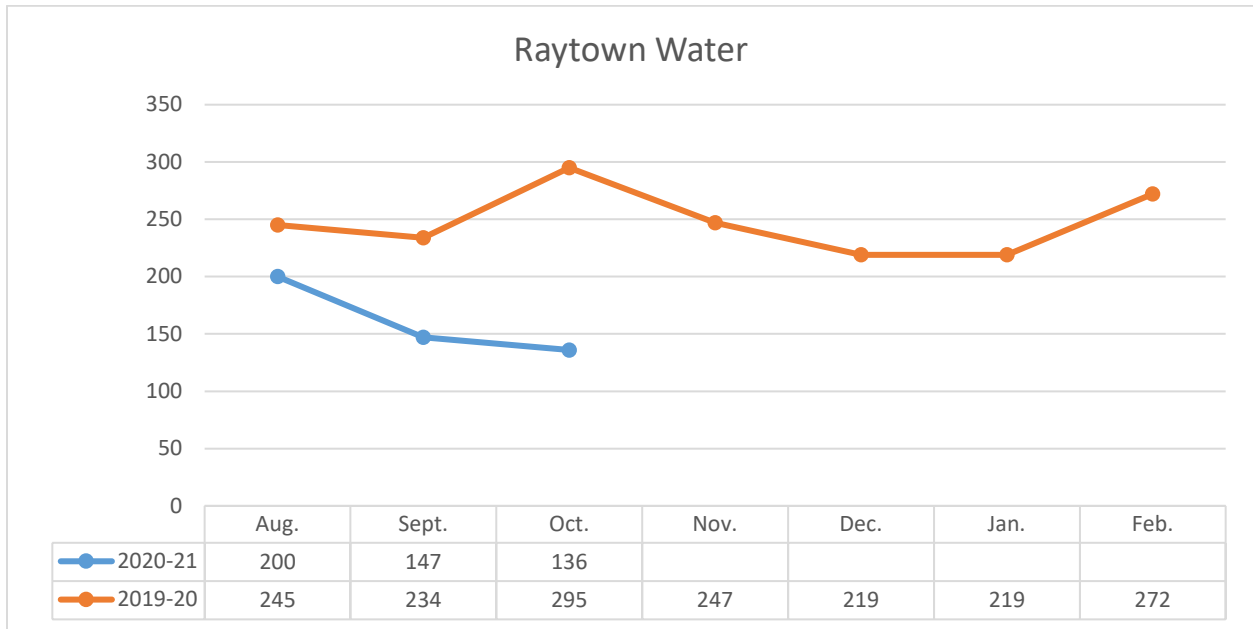
Questions 1 & 3 (Raytown Water)

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



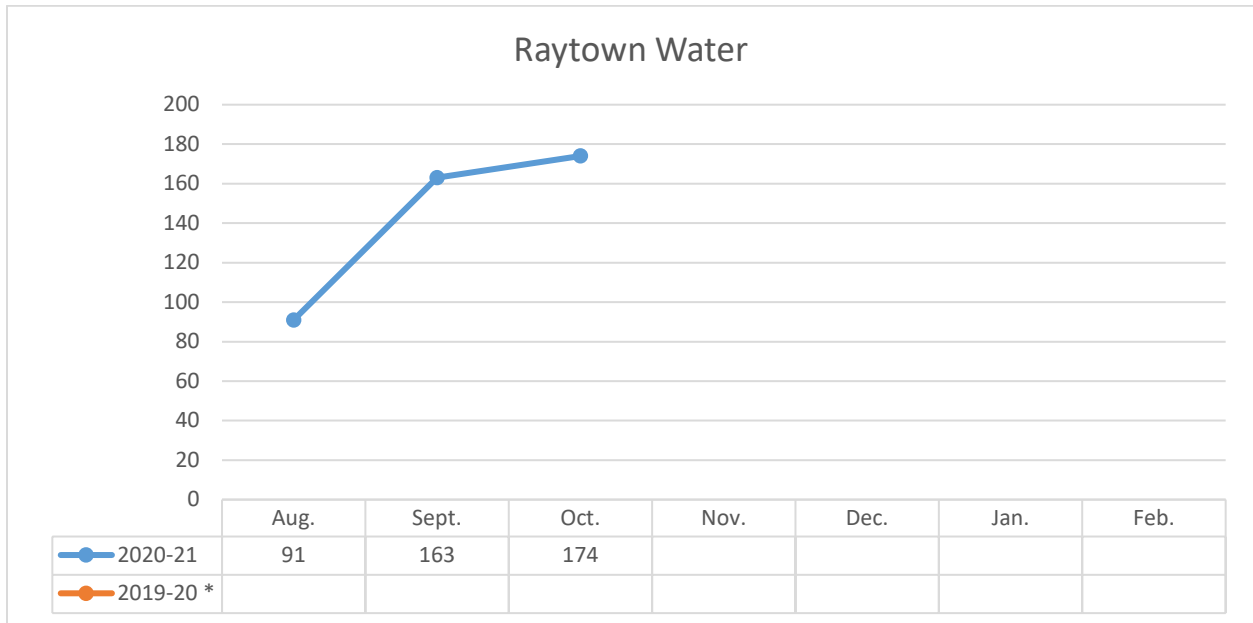
As shown in the previous graph, Raytown Water performed approximately 118% more disconnections for non-payment in October 2020 versus October 2019 and about 23% more in October 2020 than in September 2020. The number of actual disconnections by Raytown Water in October 2020 was approximately 6% above the number projected by Raytown Water for the same month.

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



The previous data indicates that there were about 54% fewer Raytown Water customers with past-due accounts in October 2020 versus October 2019 and approximately 8% less in October 2020 than in September 2020. Raytown Water reported that it defines “past-due” as accounts with balances that are over 31 days.

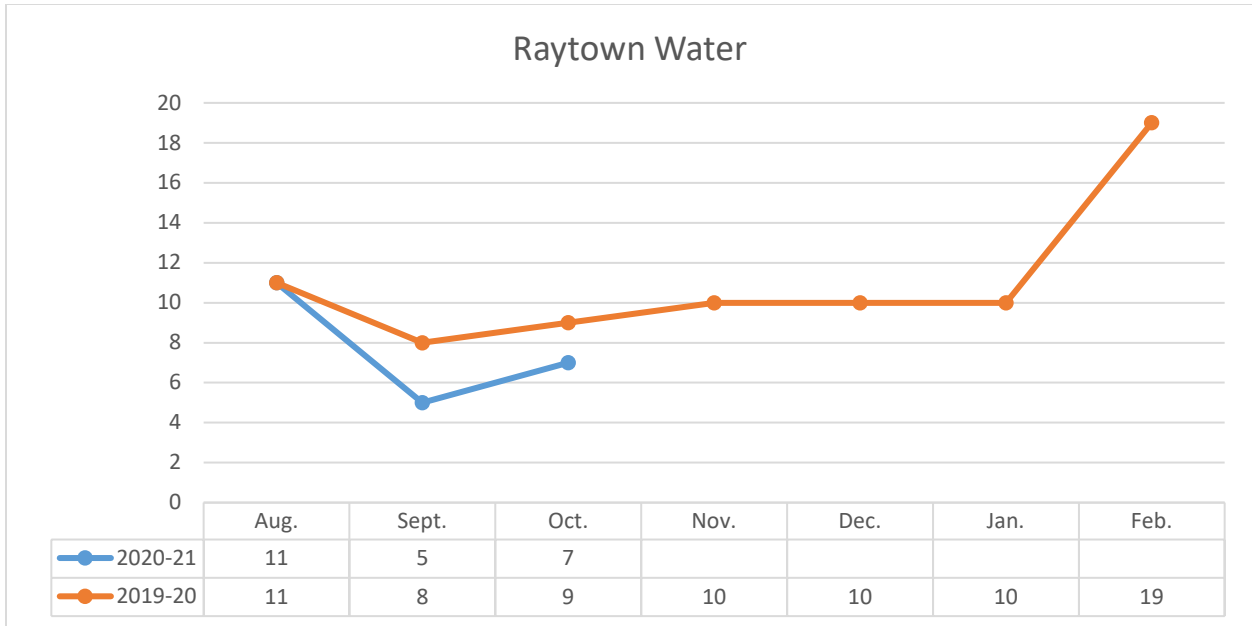
c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



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

As shown by Raytown Water’s data, 174 customers received a final disconnection notice in August 2020 but were not disconnected for non-payment of service. The Company’s data request response stated that this information was not readily available for the August 2019 through February 2019 time period. Raytown Water had approximately 7% more customer that received a final disconnection notice but were not disconnected for non-payment of service in October 2020 than in September 2020.

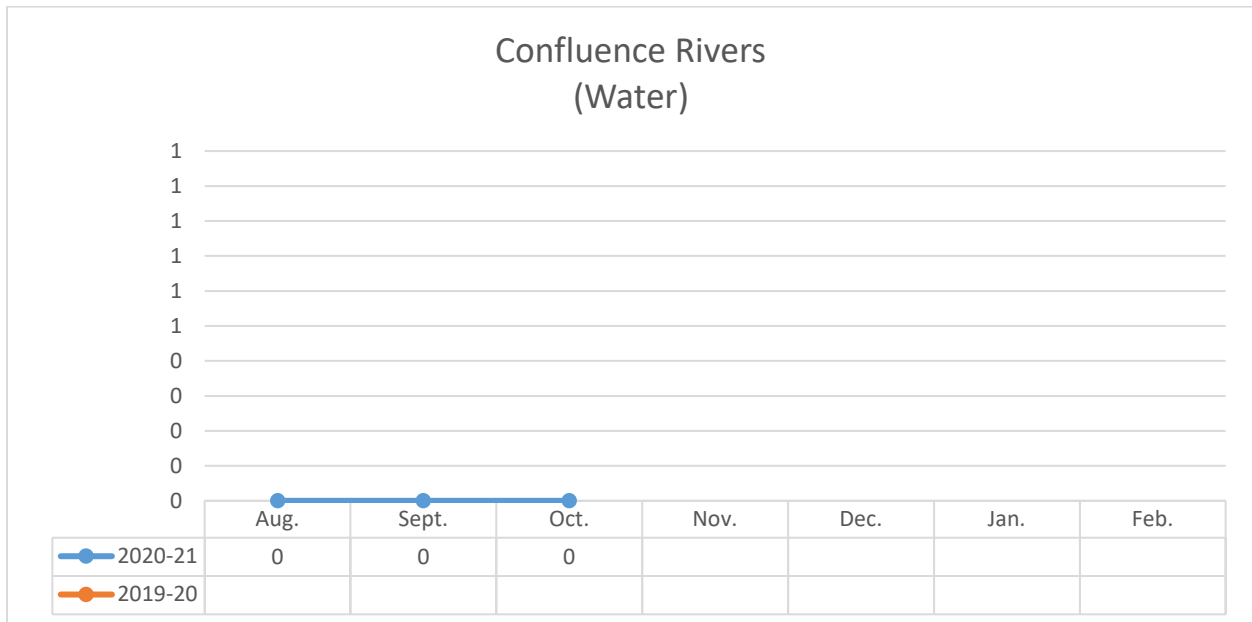
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 22% fewer Raytown Water customers who participated in payment plans in October 2020 versus October 2019 and about 40% more in October 2020 than in September 2020.

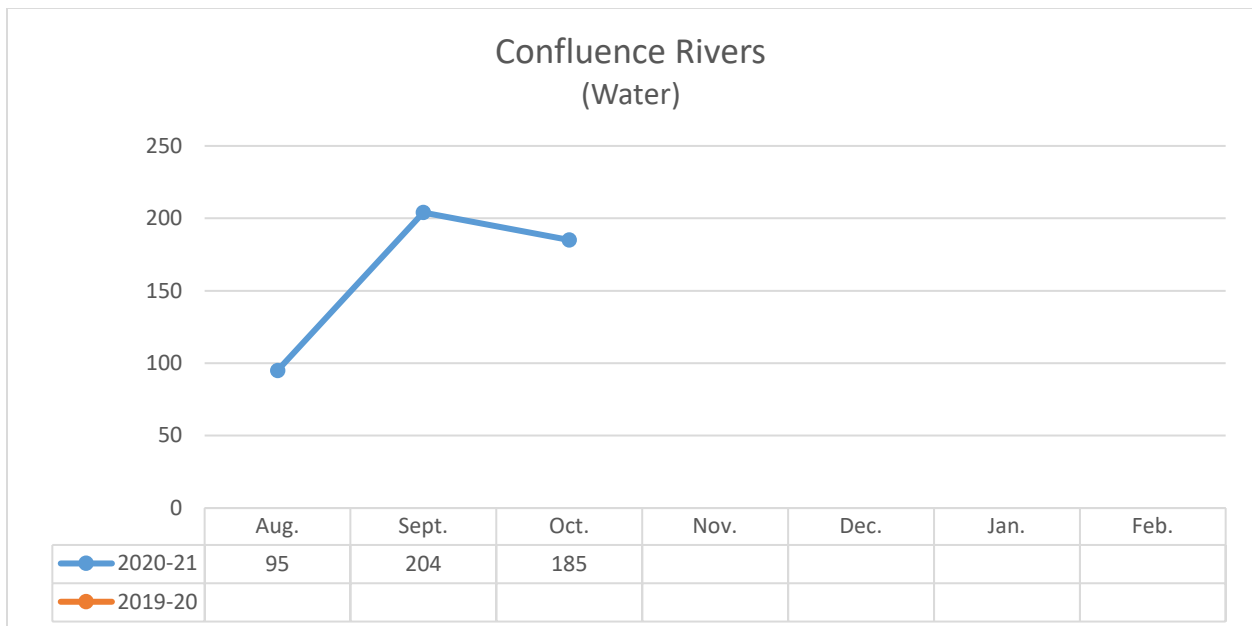
Questions 1 & 3 (Confluence Rivers - Water)

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



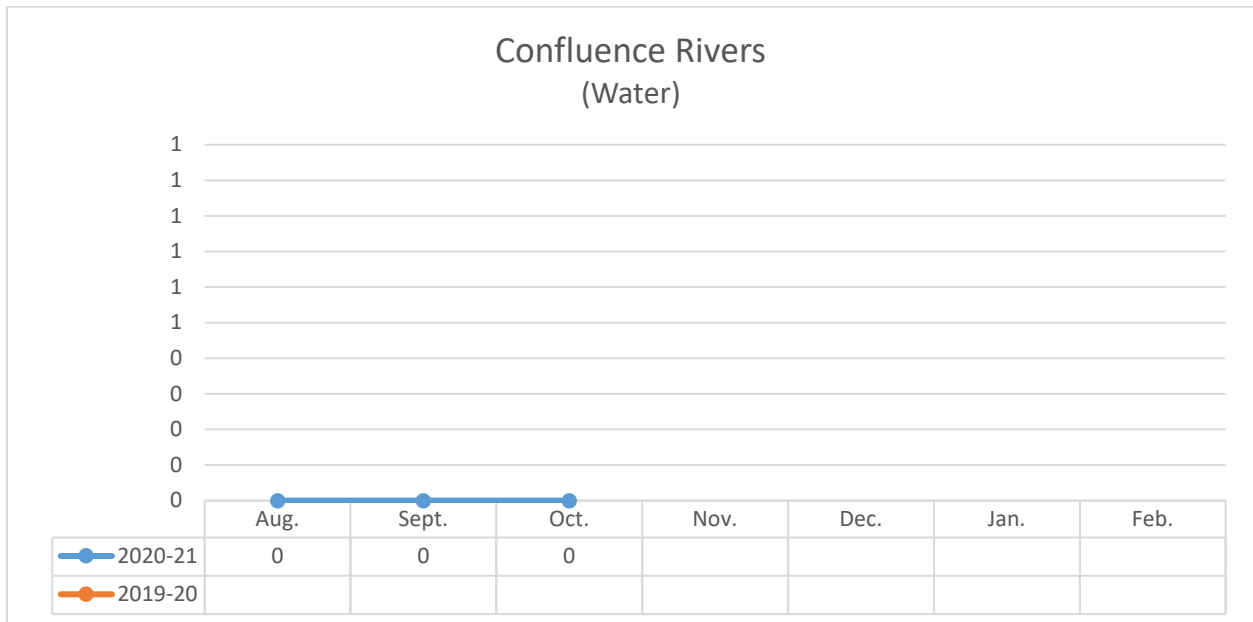
As shown in the previous graph, Confluence Rivers performed no disconnections in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 24 disconnections was performed.

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



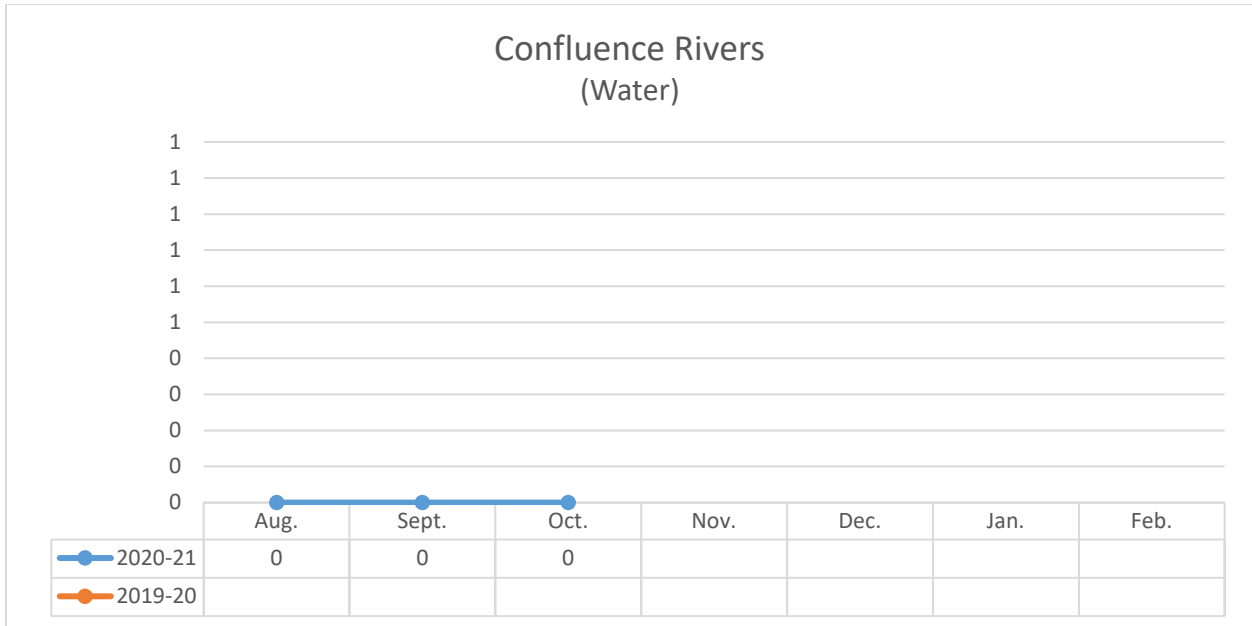
The previous data indicates there were about 9% fewer Confluence Rivers customers with past-due accounts in October 2020 versus September 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 37 customers with “past-due” accounts during this time period. Confluence Rivers reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid.

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



As shown by Confluence Rivers data, no customers received a final disconnection notice in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 13 customers who received final disconnection notices but were not disconnected during this time period.

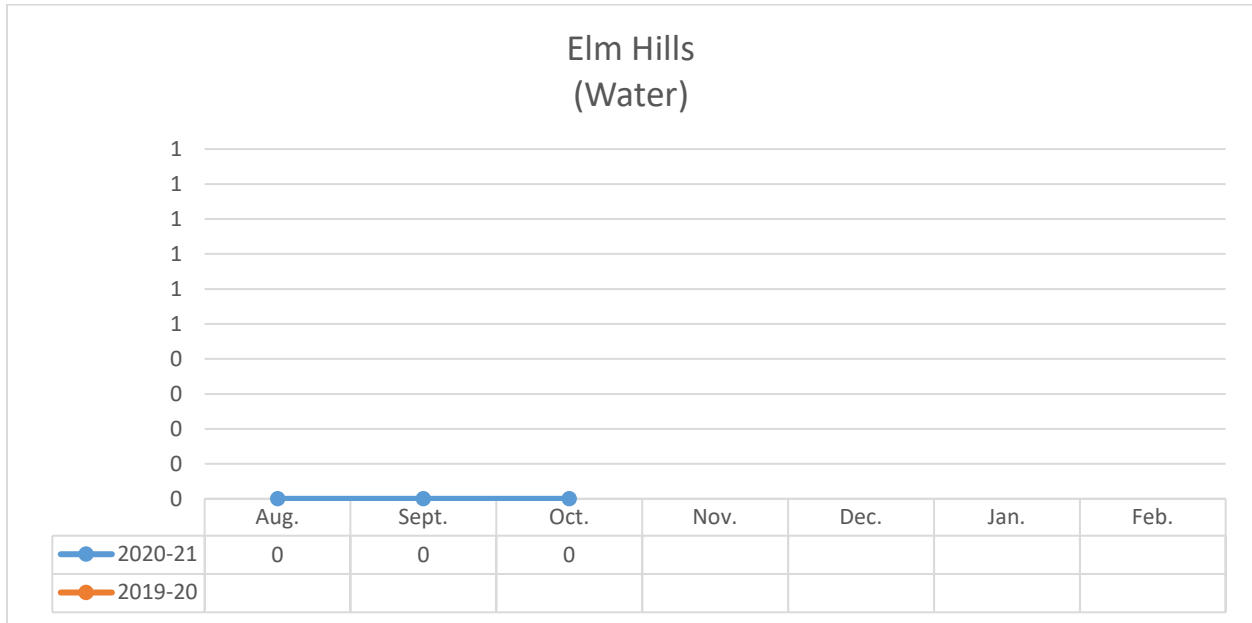
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were no Confluence Rivers customers who participated in payment plans in October 2020. The Company indicated that it will begin offering payment plans in November 2020. No monthly, comparative data was provided for August 2019 to February 2020, although the Company reported there were no customers who participated in payment plans during this time period.

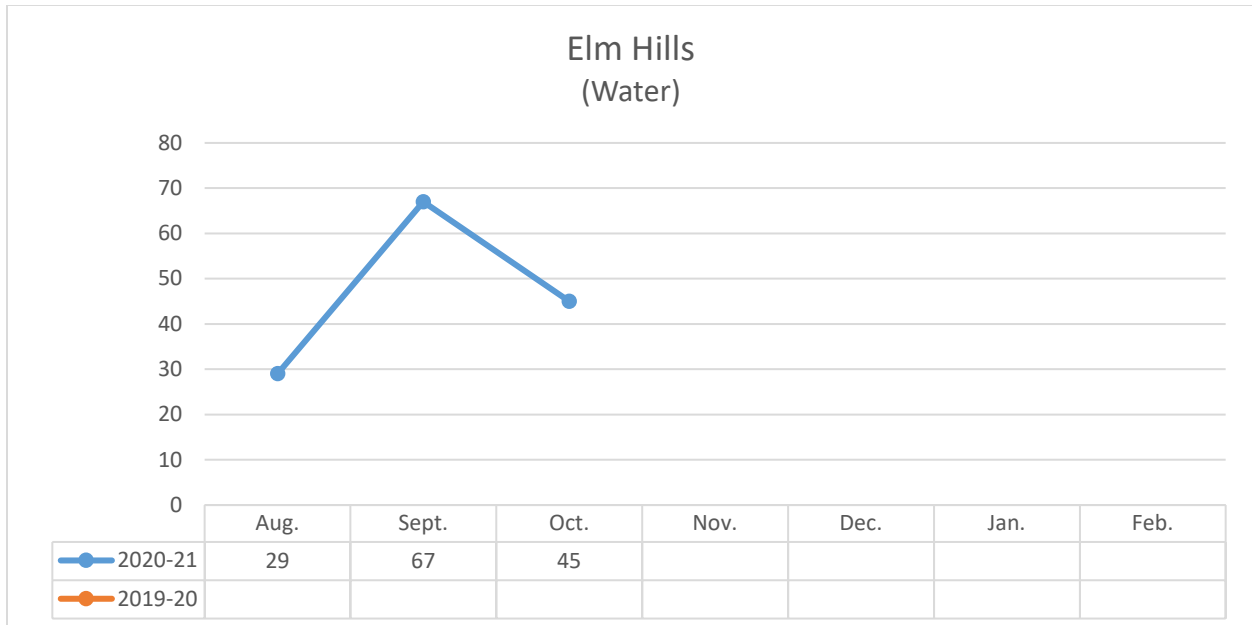
Questions 1 & 3 (Elm Hills - Water)

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



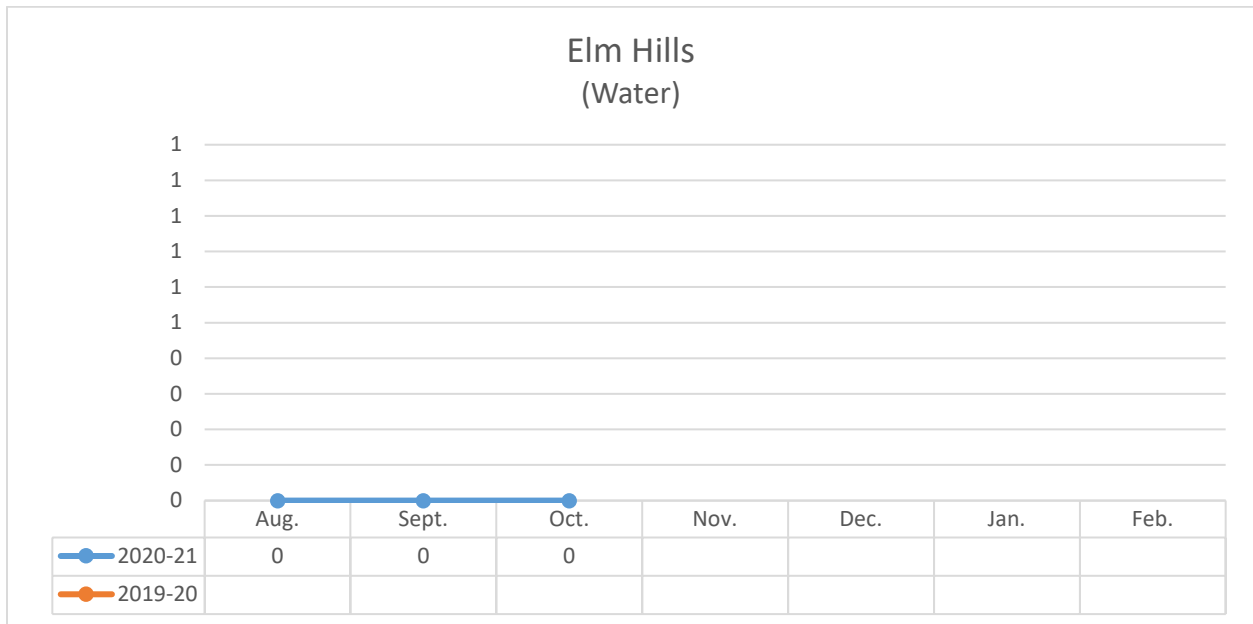
As shown in the previous graph, Elm Hills performed no disconnections in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although no disconnections were performed during this time period.

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



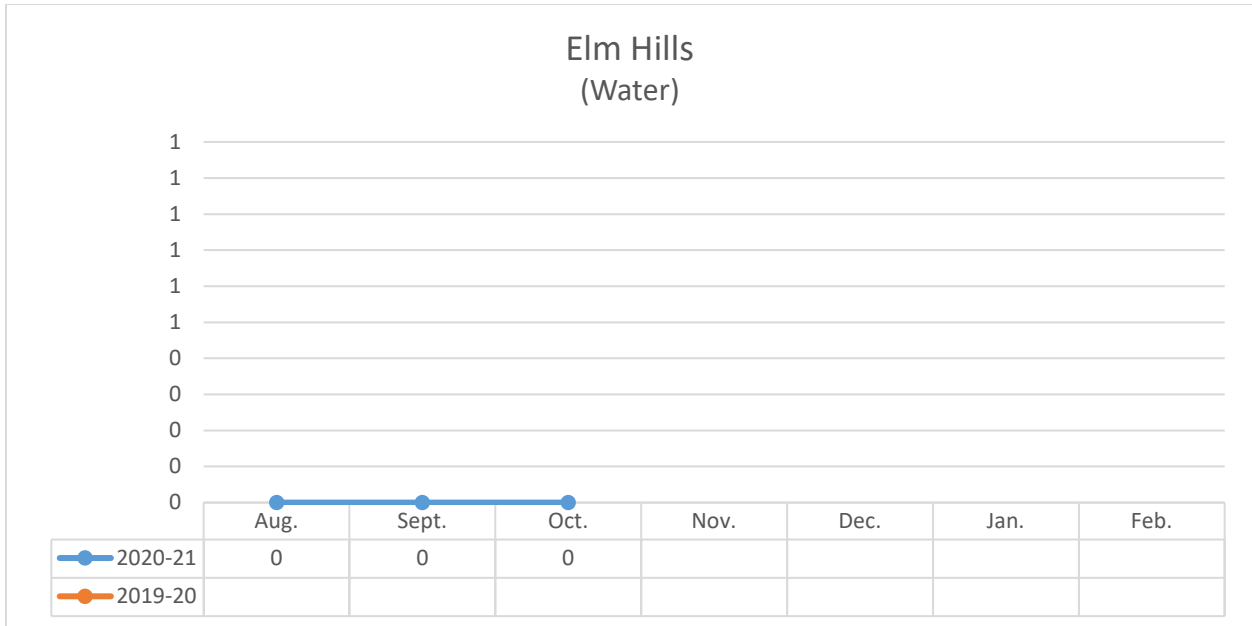
The previous data indicates there were about 33% fewer Elm Hills customers with past-due accounts in October 2020 versus September 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 1 customer with a “past-due” account during this time period. Elm Hills reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid.

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



As shown by Elm Hills data, no customers received a final disconnection notice in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 1 customer who received a final disconnection notice but was not disconnected during this time period.

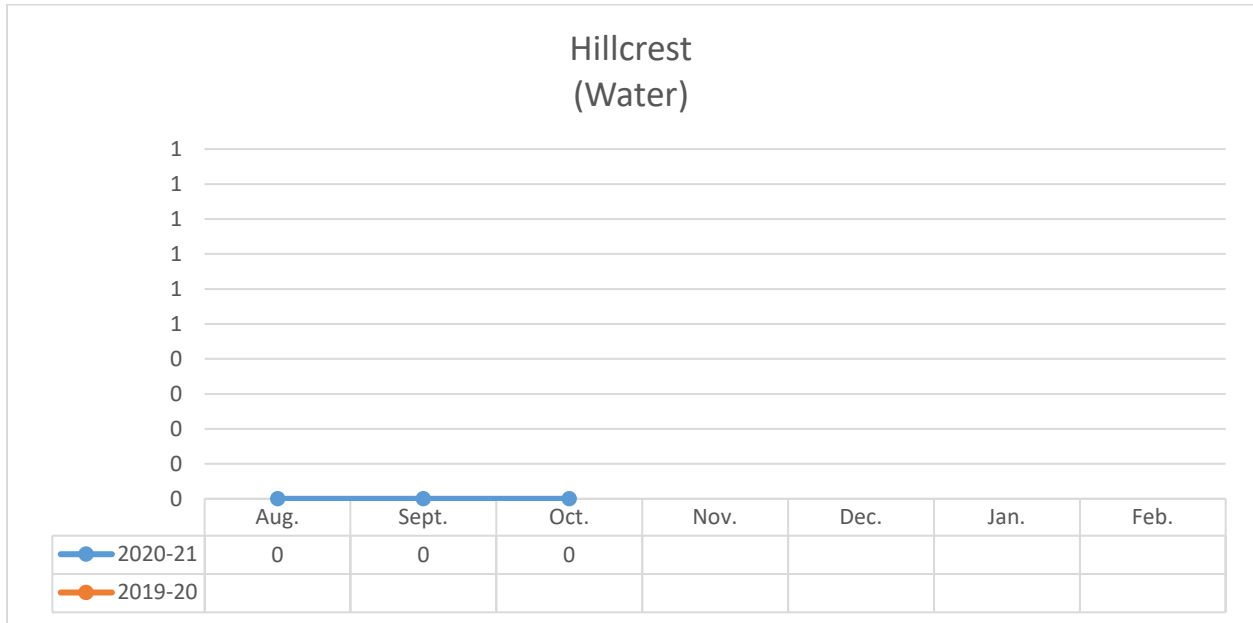
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were no Elm Hills customers who participated in payment plans in October 2020. The Company indicated that it will begin offering payment plans in November 2020. No monthly, comparative data was provided for August 2019 to February 2020, although the Company reported there were no customers who participated in payment plans during this time period.

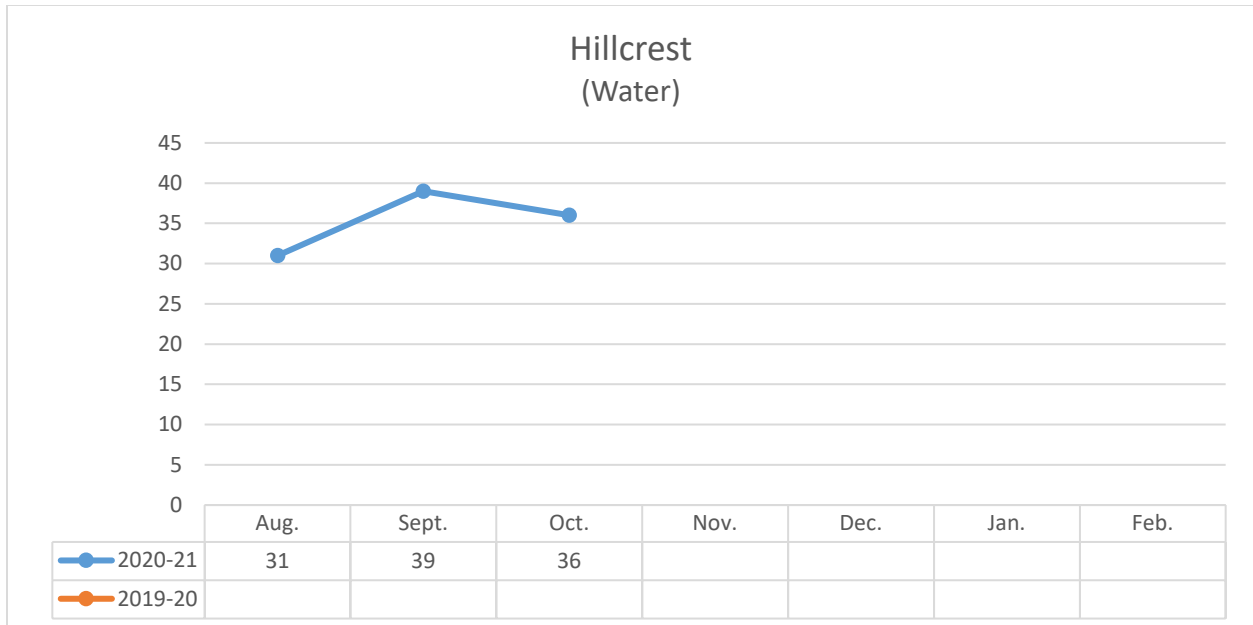
Questions 1 & 3 (Hillcrest - Water)

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



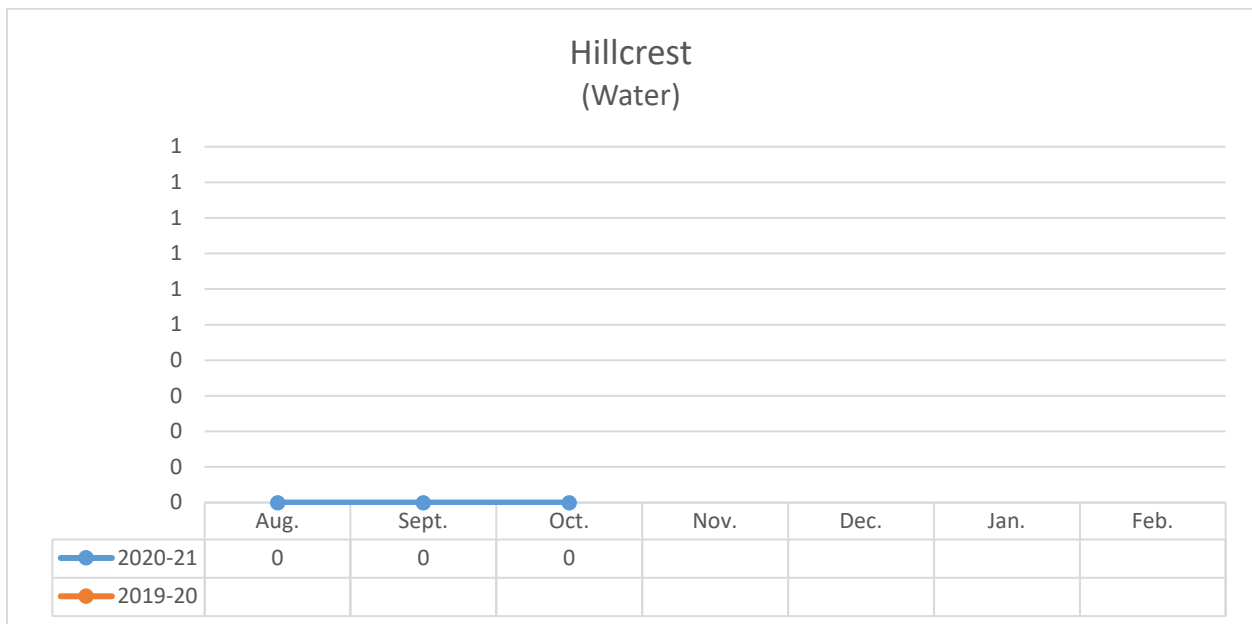
As shown in the previous graph, Hillcrest performed no disconnections in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 12 disconnections was performed during this time period.

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



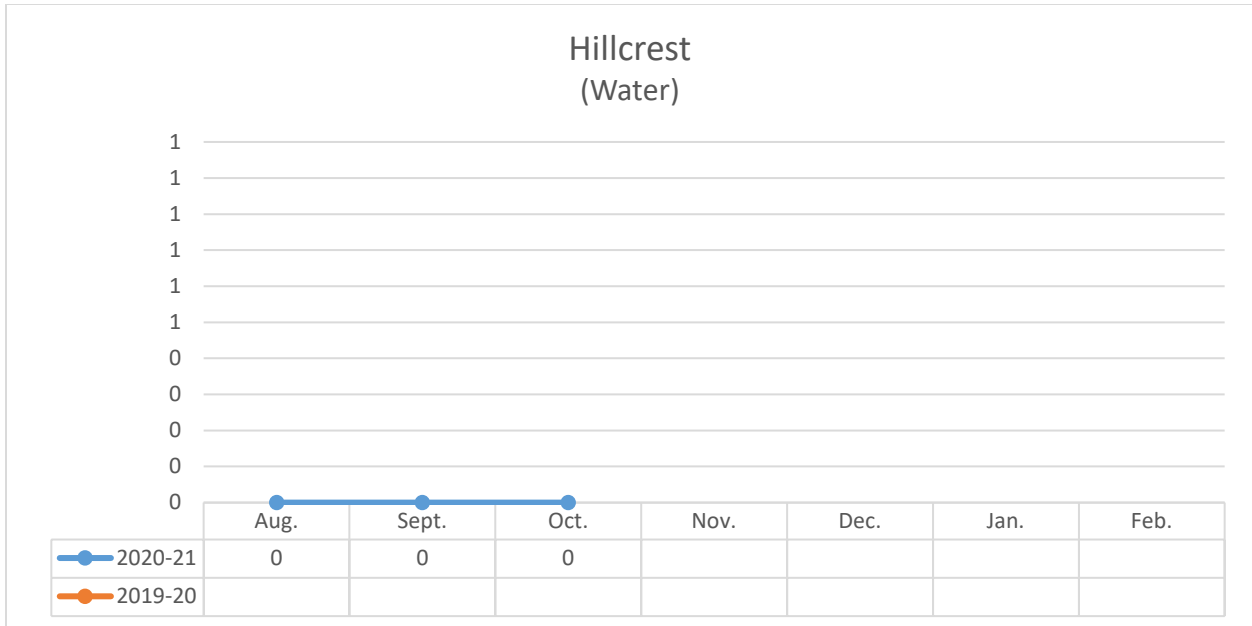
The previous data indicates there were about 8% fewer Hillcrest customers with past-due accounts in October 2020 versus September 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 16 customers with “past-due” accounts during this time period. Hillcrest reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid.

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



As shown by Hillcrest’s data, no customers received a final disconnection notice in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 4 customers who received final disconnection notices during this time period but were not disconnected.

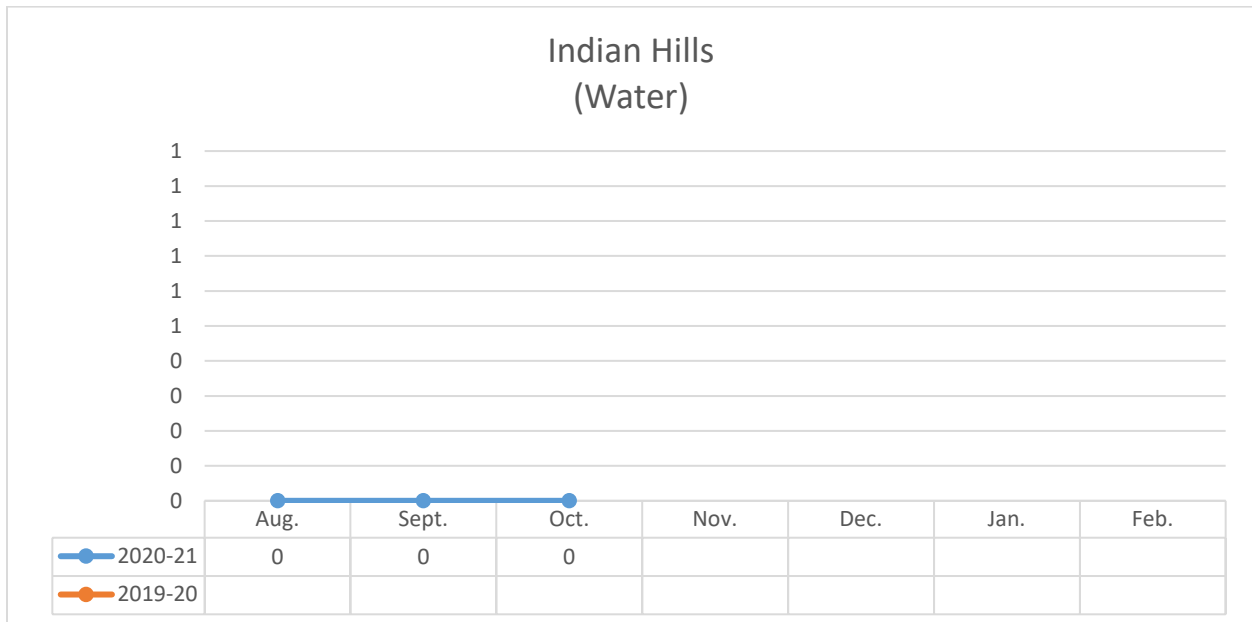
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were no Hillcrest customers who participated in payment plans in October 2020. The Company indicated that it will begin offering payment plans in November 2020. No monthly, comparative data was provided for August 2019 to February 2020, although the Company reported there were no customers who participated in payment plans during this time period.

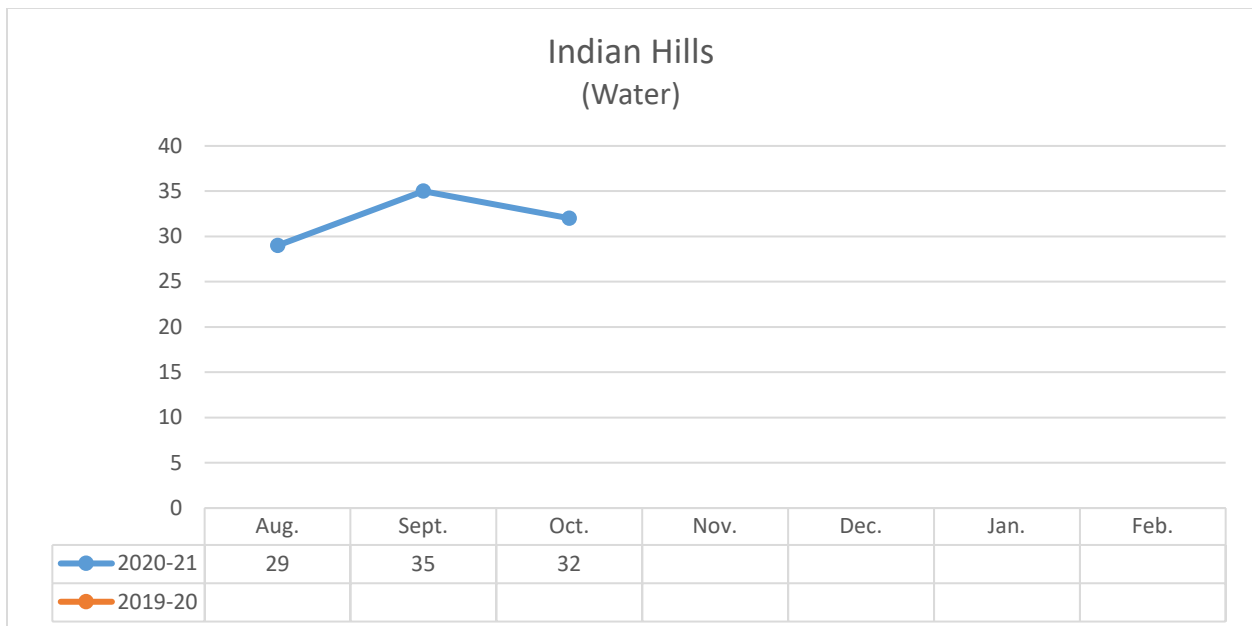
Questions 1 & 3 (Indian Hills - Water)

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



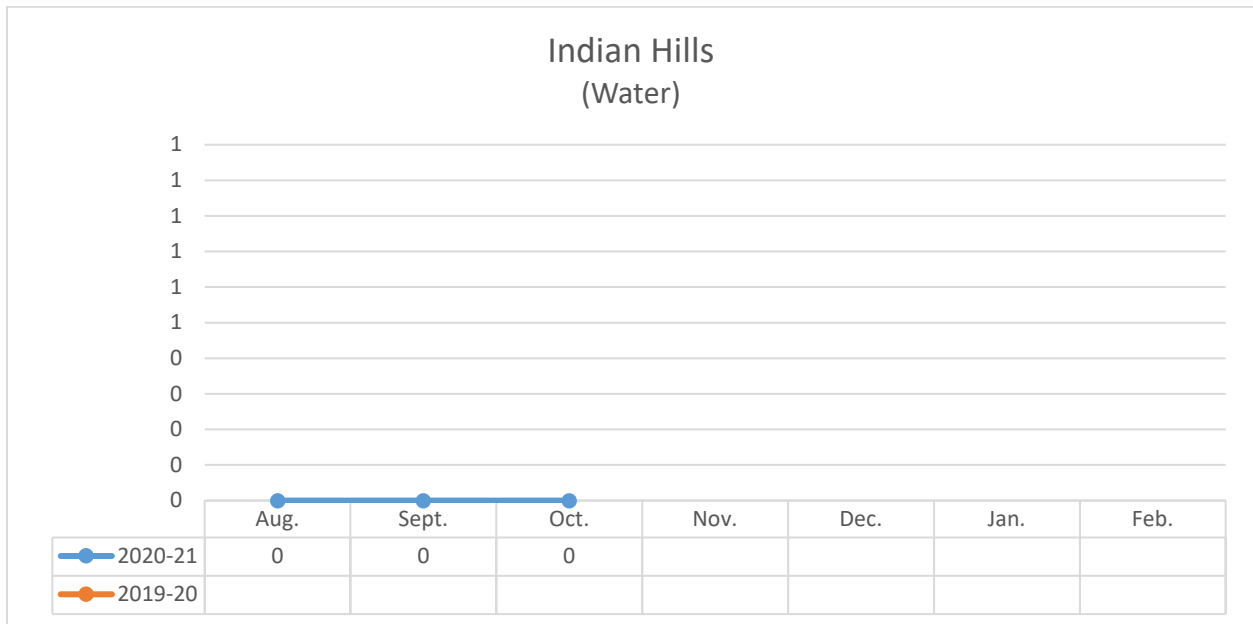
As shown in the previous graph, Indian Hills performed no disconnections in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 6 disconnections was performed during this time period.

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



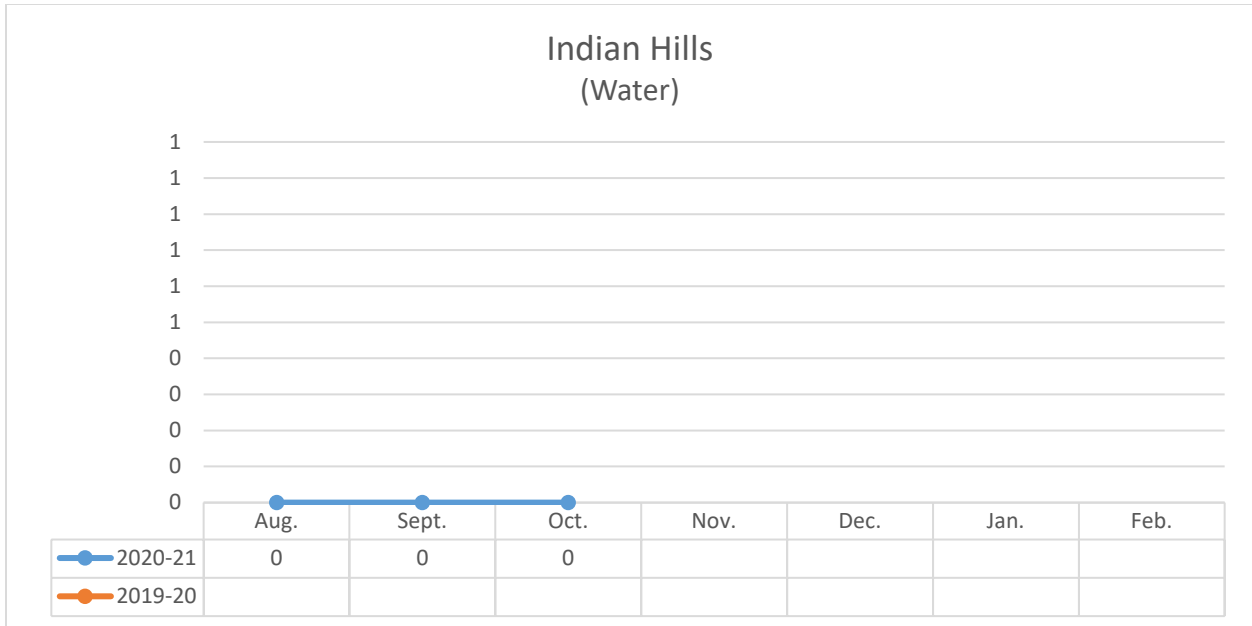
The previous data indicates there were about 9% fewer Indian Hills customers with past-due accounts in October 2020 versus September 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 11 customers with “past-due” accounts during this time period. Indian Hills reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid.

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



As shown by Indian Hills data, no customers received a final disconnection notice in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 6 customers who received final disconnection notices during this time period but were not disconnected.

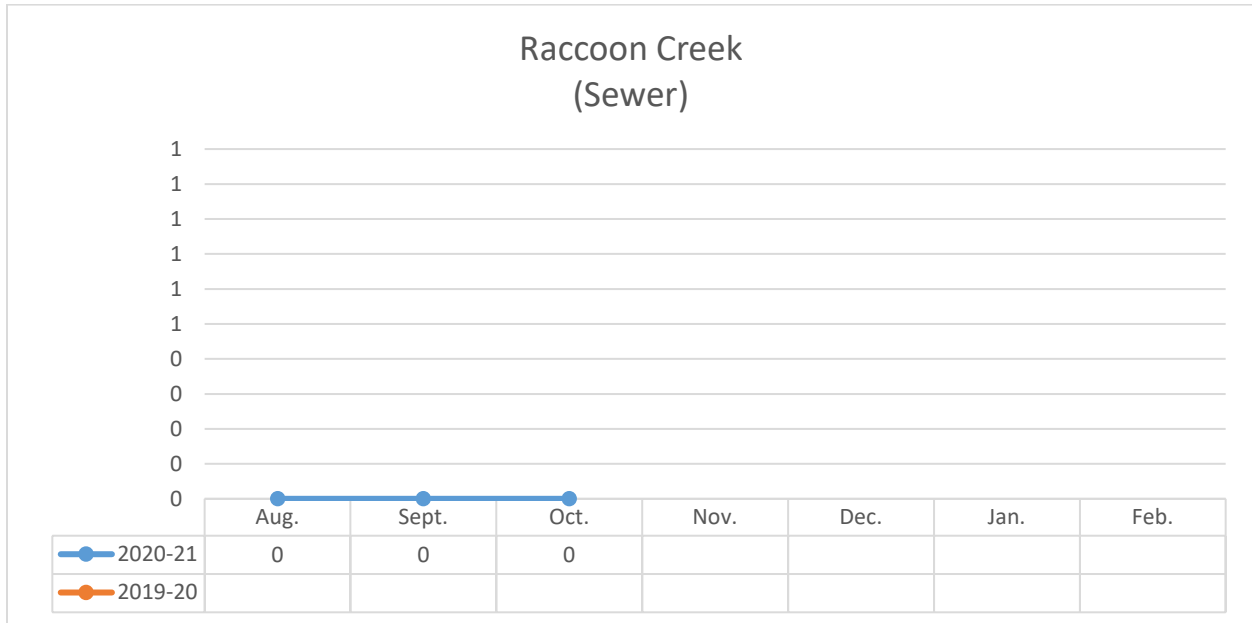
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were no Indian Hills customers who participated in payment plans in October 2020. The Company indicated that it will begin offering payment plans in November 2020. No monthly, comparative data was provided for August 2019 to February 2020, although the Company reported there was a total of 11 customers who participated in payment plans during this time period.

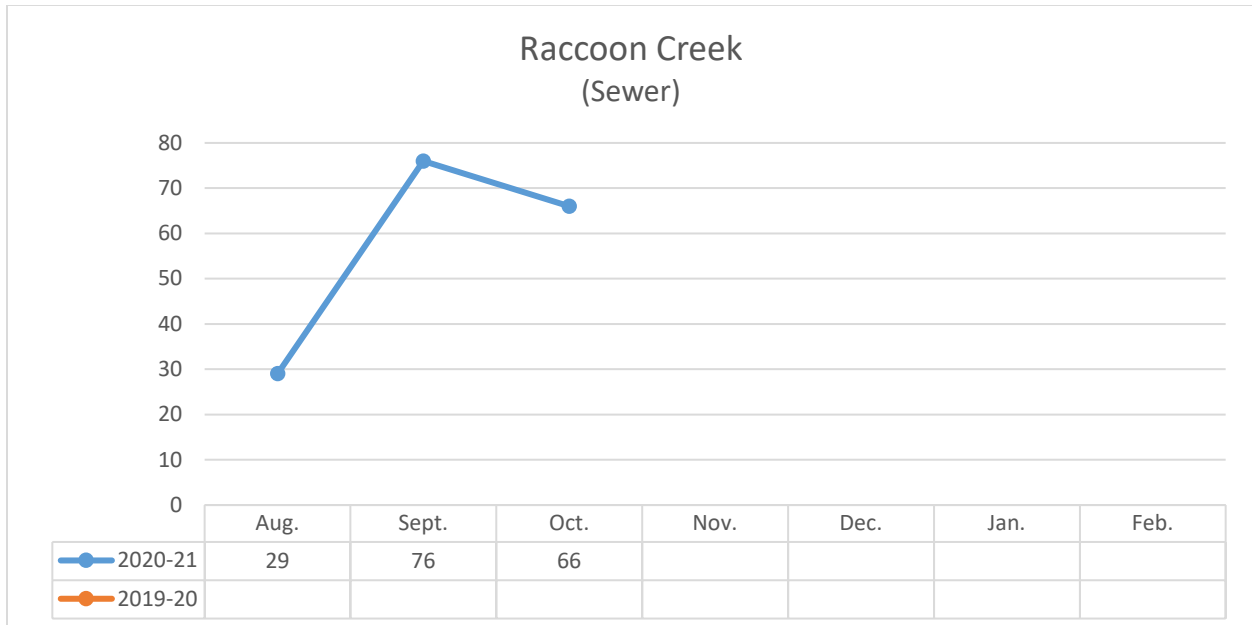
Questions 1 & 3 (Raccoon Creek - Sewer)

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



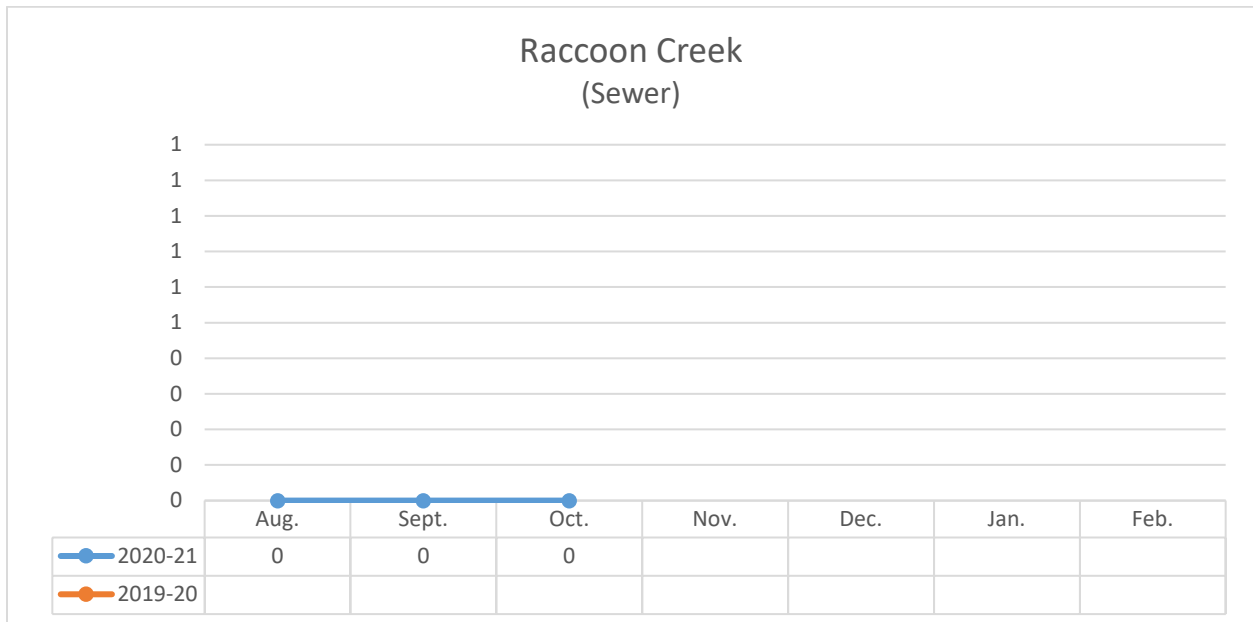
As shown in the previous graph, Raccoon Creek performed no disconnections in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although a total of one (1) disconnection was performed during this time period.

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



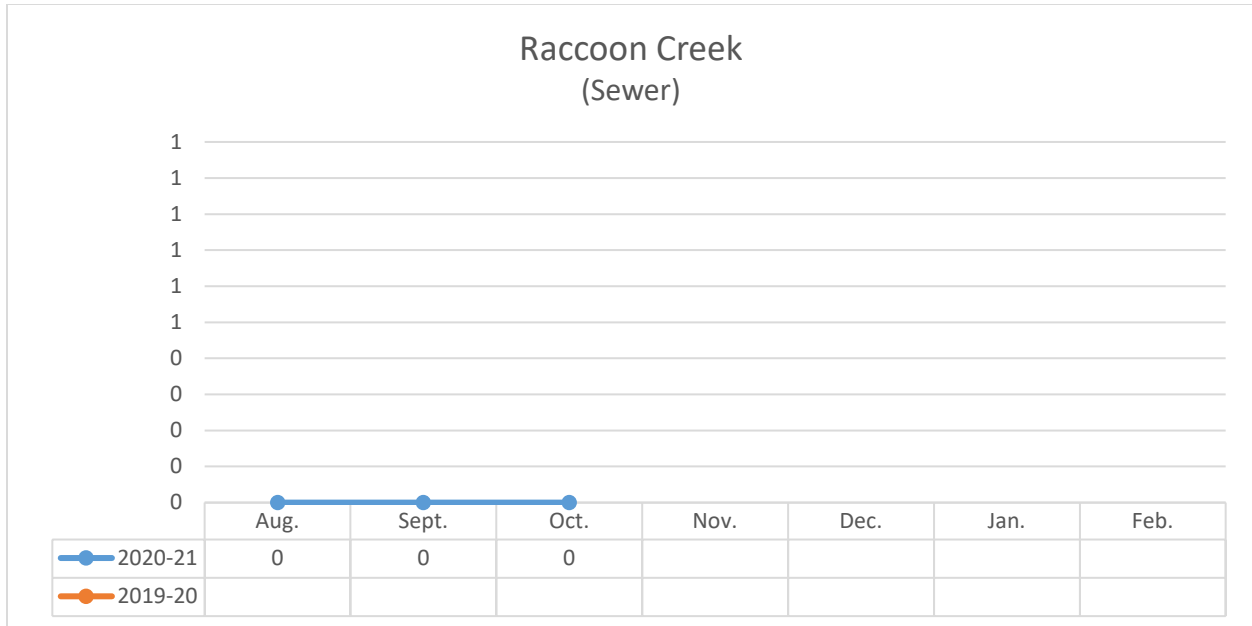
The previous data indicates there were about 13% fewer Raccoon Creek customers with past-due accounts in October 2020 versus September 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 3 customers with “past-due” accounts during this time period. Raccoon Creek reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid.

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



As shown by Raccoon Creek data, no customers received a final disconnection notice in October 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 2 customers who received final disconnection notices during this time period but were not disconnected.

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



The previous graph illustrates that there were no Raccoon Creek customers who participated in payment plans in October 2020. The Company indicated that it will begin offering payment plans in November 2020. No monthly, comparative data was provided for August 2019 to February 2020, although the Company reported there were no customers who participated in payment plans during this time period.

Question 2

Please provide your company’s estimate of the number of disconnections for non-payment of service for the six-month period of September 2020 through February 2021, with an explanation of the methodology and assumptions used to develop these projections.

Ameren Missouri (Electric)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
9,000	9,000	7,000	5,000	5,000	7,190

Ameren Missouri responded with an estimated total of 42,190 disconnections for non-payment of service for the six-month period of September 2020 through February 2021. Ameren Missouri stated that the total number was based on a 35% increase from last year because, since resuming disconnects in August 2020, the disconnect orders have increased 35% over August 2019.

Empire (Electric)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
1,600	1,600	50	50	50	50

Empire responded that several factors prevent it from working disconnects in the winter season (November-February). These factors include: temperatures and several holidays in November and December. Also, during this time period many customers participate in the cold weather agreement to avoid being disconnected for non-pay. Empire looked at the historical averages, and stated the current disconnects in August were higher than the previous years due to COVID. It was unable to disconnect for non-payment during the moratorium from March to July. It has also enlisted the help of its service centers, which will enable Empire to work more disconnects, weather permitting. With the help of its service department, Empire is projecting a maximum of 1,600 disconnects per month for September and October.

Evergy Metro (Electric)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
3,300	3,300	660	100	0	0

Evergy Metro responded that its estimates are based on recent and previous year data and resource capacity. In November, it assumed a reduced number of days that it will be eligible to do shut-offs due to weather. For December – February it assumes commercial shut-offs only due to likely Cold Weather Rule restrictions. Evergy Metro reduced its estimate for disconnections for non-payment for the months of January 2021 and February 2021 from 100 to 0 in its November 2020 data request response.

Evergy West (Electric)

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

Evergy West responded that its estimates are based on recent and previous year data and resource capacity. In November, it assumed a reduced number of days that it will be eligible to do shut-offs

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due to weather. For December – February it assumes commercial shut-offs only due to likely Cold Weather Rule restrictions. Evergy West reduced its estimate for disconnections for non-payment for the months of January 2021 and February 2021 from 60 to 0 in its November 2020 data request response.

Ameren Missouri (Gas)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
230	176	15	35	55	2

Ameren Missouri responded with an estimated total of 530 disconnections for non-payment of service for the six-month period of September 2020 through February 2021. Ameren Missouri stated that the total number was based on a 35% increase from last year because, since resuming disconnects in August 2020, the disconnect orders have increased 35% over August 2019.

Spire (Gas)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
5,673	5,379	1,091	963	862	2,249

Spire responded that its estimate includes a 3-year average each month and Sept/Oct with 30% added due to expected volume.

Summit (Gas)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
201	64	13	7	40	53

Summit did not provide an explanation of the methodology and assumptions used to develop these projections.

Empire (Gas)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
1,140	1,140	1,140	50	50	50

Staff Report

Empire responded that normally in November through December it is not able to disconnect very many customers because the Credit reps are on the phones helping to keep up the service level. Also, the temperatures aren't usually the most favorable during that time period. Empire is normally able to start disconnects again the beginning of the year, weather permitting. It believes that the bills are going to be quite a bit higher due to the pandemic. It is projecting a maximum of 1,140 disconnects per month for September and October, with the probability of disconnects being very minimal in November-February due to taking calls and weather.

Liberty (MNG - Gas)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
1,200	1,200	1,200	25	25	120

Liberty responded that its estimates are based on August 2020 disconnections for September and October. It used historical averages of the past three years for the winter months of November thru February. It also said that weather constraints will play a major part in disconnects especially in its Northern areas.

Liberty (Water)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
60	60	40	40	40	40

Liberty responded that several factors prevent it from working disconnects in the winter season (November-February). These factors include: temperatures and several holidays in November and December. Liberty also looked at the historical averages and found that the current disconnects in August were higher than the previous years due to COVID. Liberty was unable to disconnect for non-payment during the moratorium from March to July.

Missouri American (Water)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
Do not forecast	-	-	-	-	-

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

Raytown Water (Water)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
105	208	71	88	85	72

Raytown Water responded that its estimated numbers are based on an average of 2018-2019 data for the same month.

Confluence Rivers (Water)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
0	Unknown at this time	-	-	-	-

Confluence Rivers responded that it does not have an estimated amount of disconnections for the time period specified. It plans to resume disconnection processes in October.

Elm Hills (Water)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
0	Unknown at this time	-	-	-	-

Elm Hills responded that it does not have an estimated amount of disconnections for the time period specified. It plans to resume disconnection processes in October.

Hillcrest (Water)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
0	Unknown at this time	-	-	-	-

Hillcrest responded that it does not have an estimated amount of disconnections for the time period specified. It plans to resume disconnection processes in October.

Indian Hills (Water)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
0	Unknown at this time	-	-	-	-

Indian Hills responded that it does not have an estimated amount of disconnections for the time period specified. It plans to resume disconnection processes in October.

Raccoon Creek (Sewer)

9/2020	10/2020	11/2020	12/2020	1/2021	2/2021
0	Unknown at this time	-	-	-	-

Raccoon Creek responded that it does not have an estimated amount of disconnections for the time period specified. It plans to resume disconnection processes in October.