

**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 DRs in this docket, initially filed on August 24, 2020, Staff asked state utilities to update these numbers on a monthly basis. In its *Order Extending Direction to Staff to Gather Information About Utility Disconnections*, issued on December 2, 2020, the Commission ordered the state utilities to file updated responses to Staff’s DRs by the 15th of every month.

3. When Staff originally issued it 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, starting with this month's report.

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. Five of the seventeen utilities ordered by the Commission to provide responses for this report failed to reply to either Staff's initial or supplemental DRs. The Central States Water Resources ("CSWR") entities that did not provide any updated data are:

- a. Confluence Rivers Utility Operating Company, Inc.;
- b. Elm Hills Utility Operating Company, Inc.;
- c. Hillcrest Utility Operating Company, Inc.;
- d. Indian Hills Utility Operating Company, Inc.; and
- e. Raccoon Creek Utility Operating Company, Inc.

7. A representative from CSWR reached out to Staff on May 6, 2021 with a spreadsheet responsive to DRs from the Office of the Public Counsel. Staff informed the representative from CSWR that the spreadsheet was not responsive to Staff's DRs. Staff shared a copy of Staff's initial DR, the supplemental DR, and a copy of a response the Raccoon Creek Utility Operating Company, Inc. filed in November 2020 to help CSWR properly respond to Staff's DRs in this docket.

8. Staff followed up with the CSWR representative on May 18, 2021 to inquire if responses to Staff's DRs were forthcoming.

9. CSWR informed Staff on May 24, 2021 that personnel matters resulted in CSWR's inability to respond to Staff's DRs.

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

Respectfully Submitted,

/s/ Travis J. Pringle

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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 24th day of May, 2021.

/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

May 24, 2021

Appendix A

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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 eighth such update, incorporating information through the end of April 2021 when available.

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

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

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

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

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

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

For purposes of this updated report, the following utilities responded to this Staff data request with month-end April 2021 data and the updated data requests, and their responses are included in this report: Ameren Missouri ("Ameren Missouri - Electric"), Ameren Missouri ("Ameren Missouri - Gas"), Evergy Missouri Metro, Inc. ("Evergy Metro – Electric"), Evergy Missouri West ("Evergy West – Electric"), Summit Natural Gas of Missouri ("Summit – Gas"), The Empire District Electric Company ("Empire - Electric"), The Empire District Gas Company ("Empire - Gas"); Spire Missouri, Inc. ("Spire – Gas"), Liberty Utilities (Missouri Water), LLC ("Liberty – Water"); Liberty Midstates Gas ("Liberty – MNG – Gas"), Missouri-American Water Company ("Missouri-American – Water"), and The Raytown Water Company ("Raytown Water").

The following utilities did not respond to the Staff data request with month-end April 2021 data in time to incorporate the information into this report: 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 are part of the Central States Water Resources (“CSWR”) family of water and sewer utilities. Information for the CSWR utilities will be provided through month-end January 2021 in this 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 April 2020 (orange dots and line), and for the period of August 2020 through April 2021 (blue dots and line). As this report is updated in the future, the orange dots and line and the blue dots and line will extend through future months. This method of presentation will allow for a direct comparison of the reported information for each month from August 2020 to April 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 April 2021 compared to March 2021).

Summary of Responses to Questions 1 and 3

Regarding Question 1a and 3a, most of the individual utilities reported increases in the number of customer disconnections for April 2021 compared to the previous month, March 2021. Several utilities experienced sizeable increases in this metric between the two months.

For Question 1b and 3b, all of reporting utilities reported either decreases in the number of past-due customer accounts in April 2021 compared to the amount from March 2021, or steady numbers between the two months.

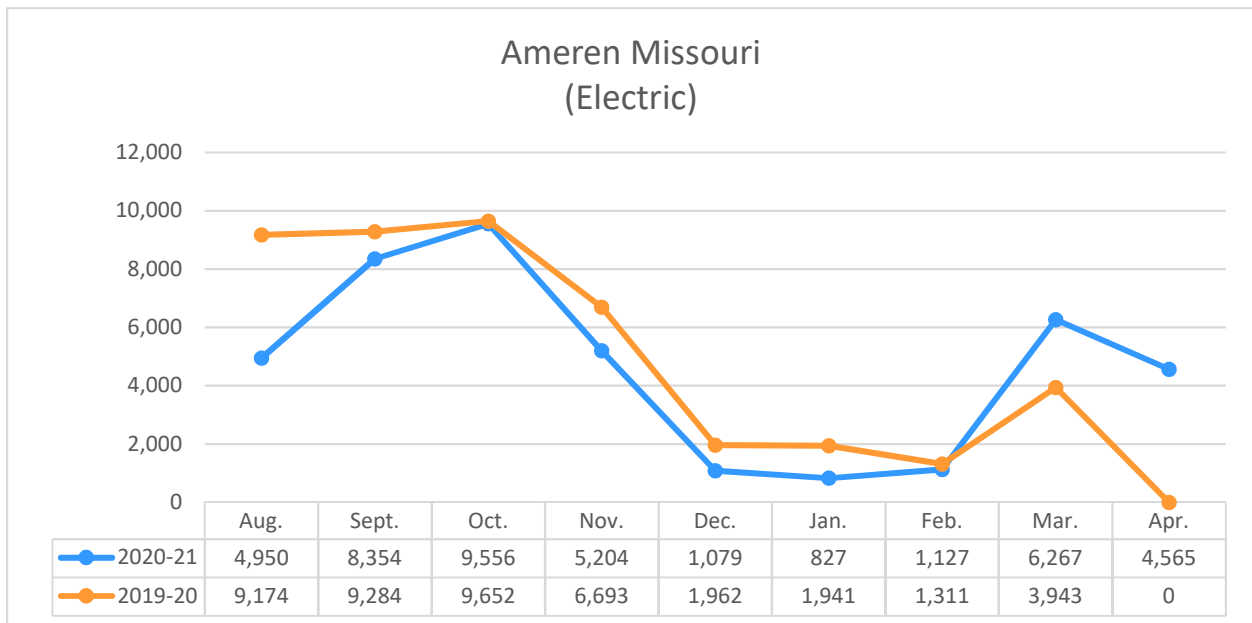
For Question 1c and 3c, in April 2021, more utilities reported decreases than increases in the number of customers who have received final disconnection notices, but have not yet been disconnected, compared to March 2021.

Regarding Question 1d and 3d, approximately the same number of utilities reported increases and decreases in the number of customers participating in payment plans in April 2021 compared to March 2021.

Individual Utility Responses:

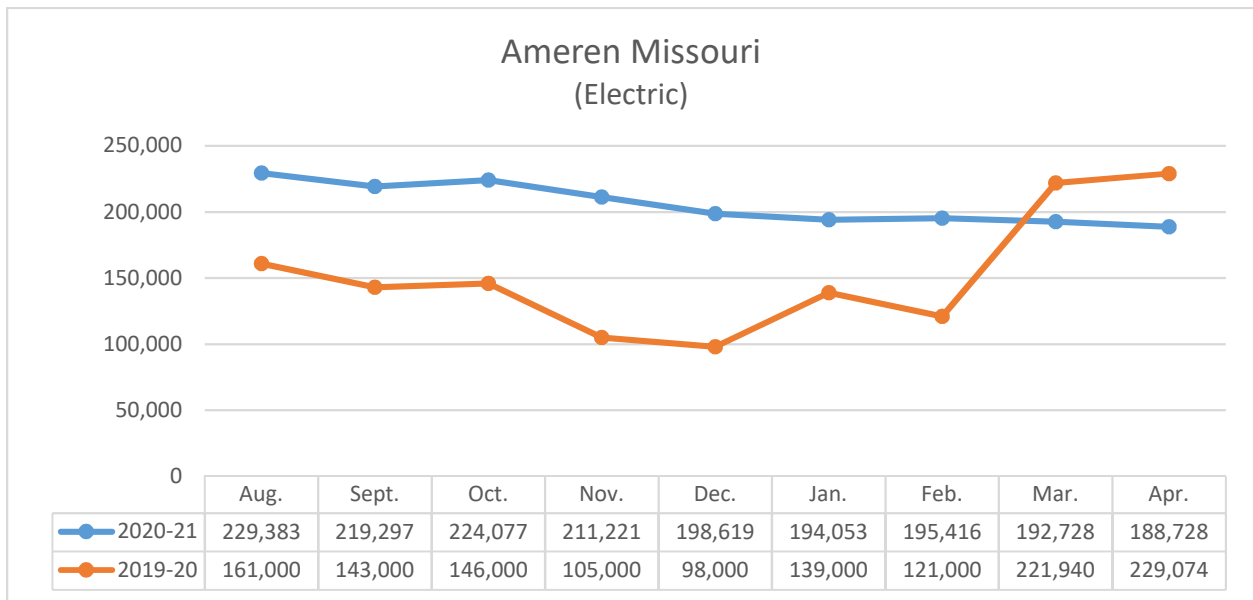
Questions 1 & 3 (Ameren Missouri – Electric)

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



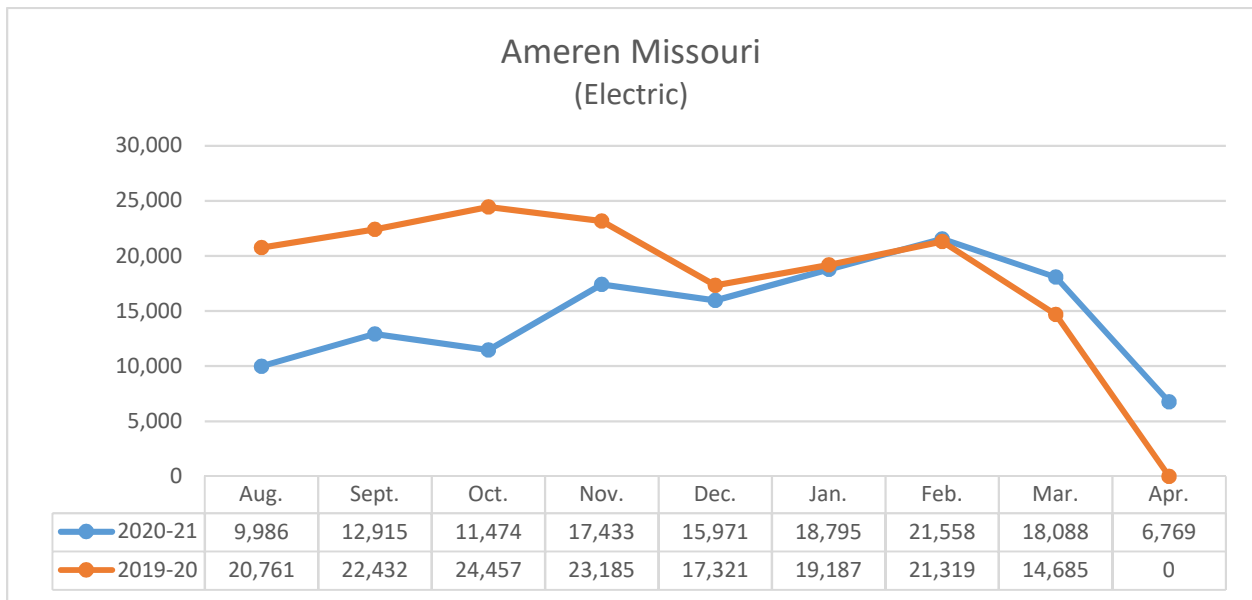
As shown in the previous graph, Ameren Missouri 4,565 disconnections for non-payment in April 2021 versus none in April 2020 and about 27% fewer in April 2021 than in March 2021. Estimated data was not provided that would enable Staff to calculate a comparison with the number projected by Ameren Missouri 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”



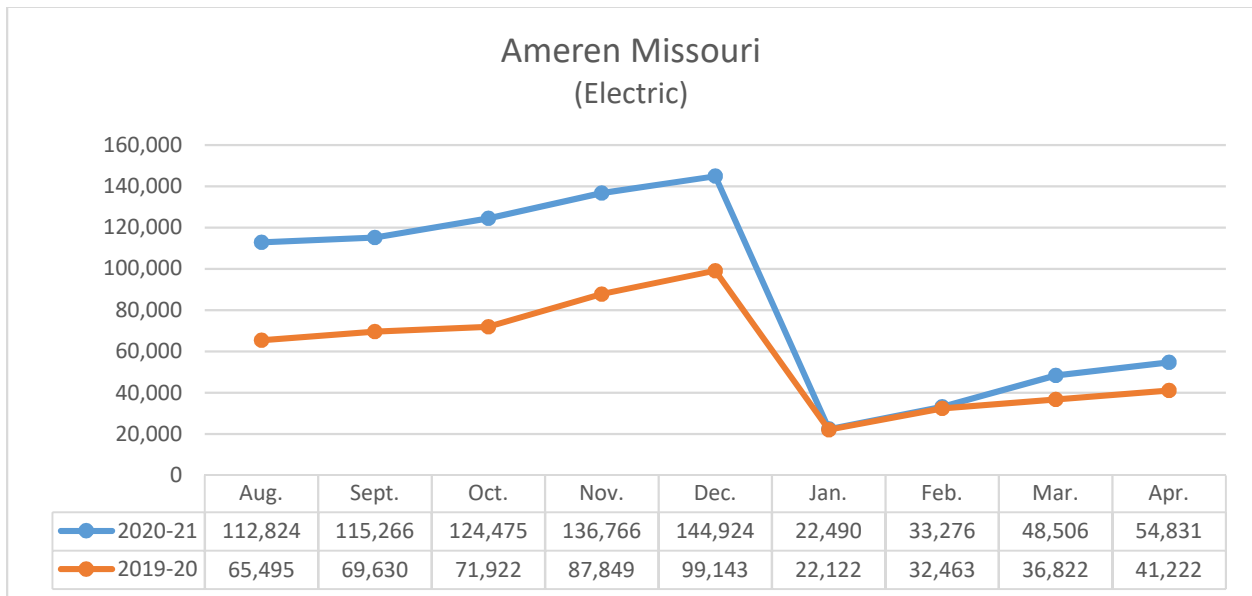
The previous data indicates that there were approximately 18% fewer Ameren Missouri customers with past-due accounts in April 2021 versus April 2020 and approximately 2% fewer in April 2021 than in March 2021. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

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 6,769 customers who were not disconnected in April 2021 versus none in April 2020 and approximately 63% less in April 2021 than in March 2021.

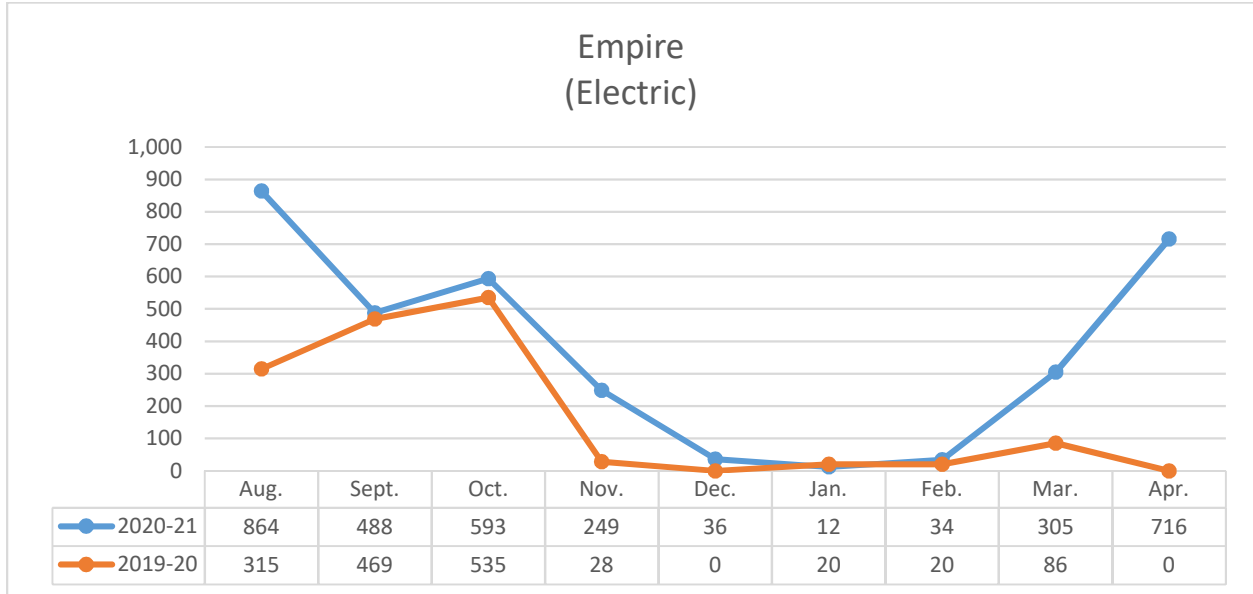
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 33% more Ameren Missouri customers who participated in payment plans in April 2021 versus April 2020 and about 13% more in April 2021 than in March 2021.

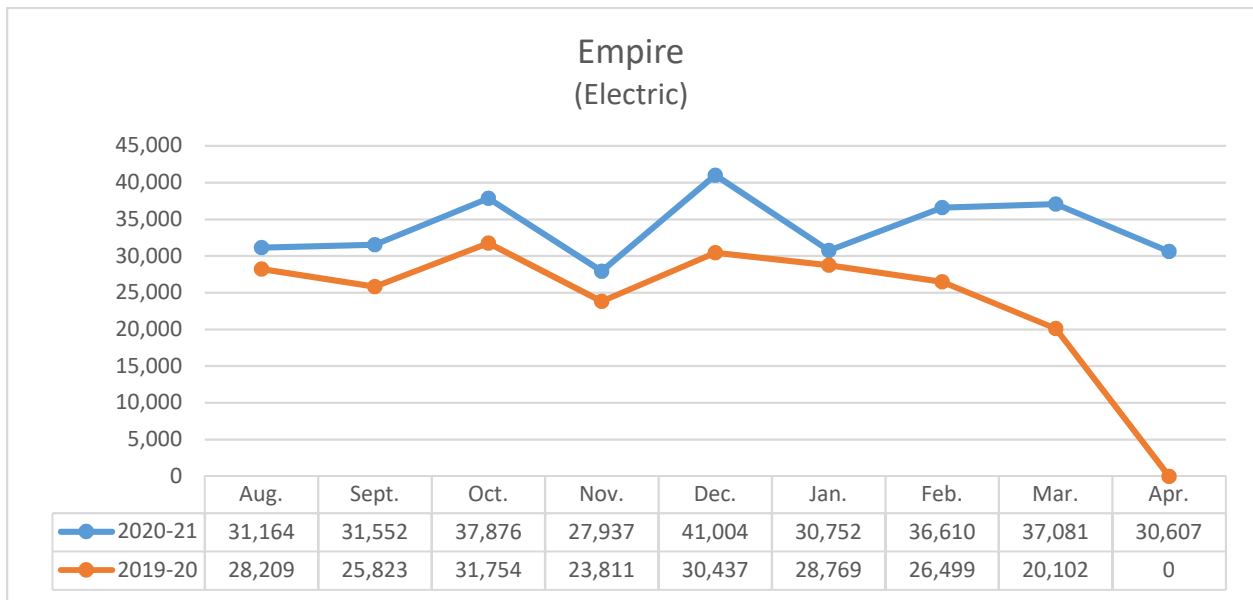
Questions 1 & 3 (Empire – Electric)

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



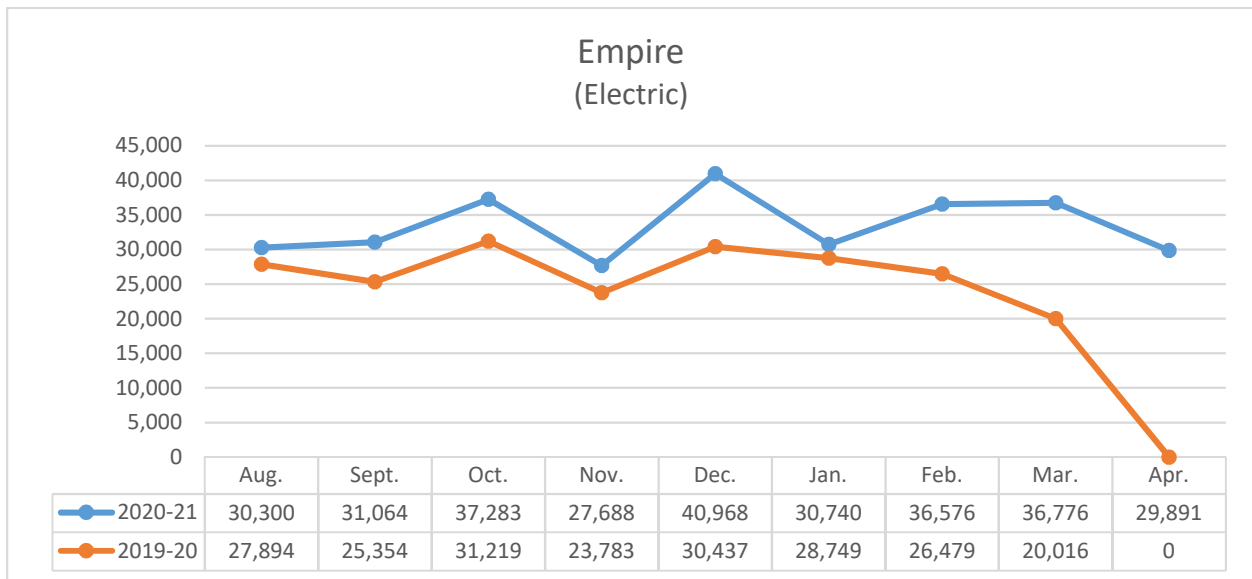
As shown in the previous graph, Empire performed 716 disconnections for non-payment in April 2021 versus none in April 2020 and about 135% more in April 2021 than in March 2021. The number of actual disconnections by Empire in April 2021 was 28% below the amount projected by Empire for the same month.

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”



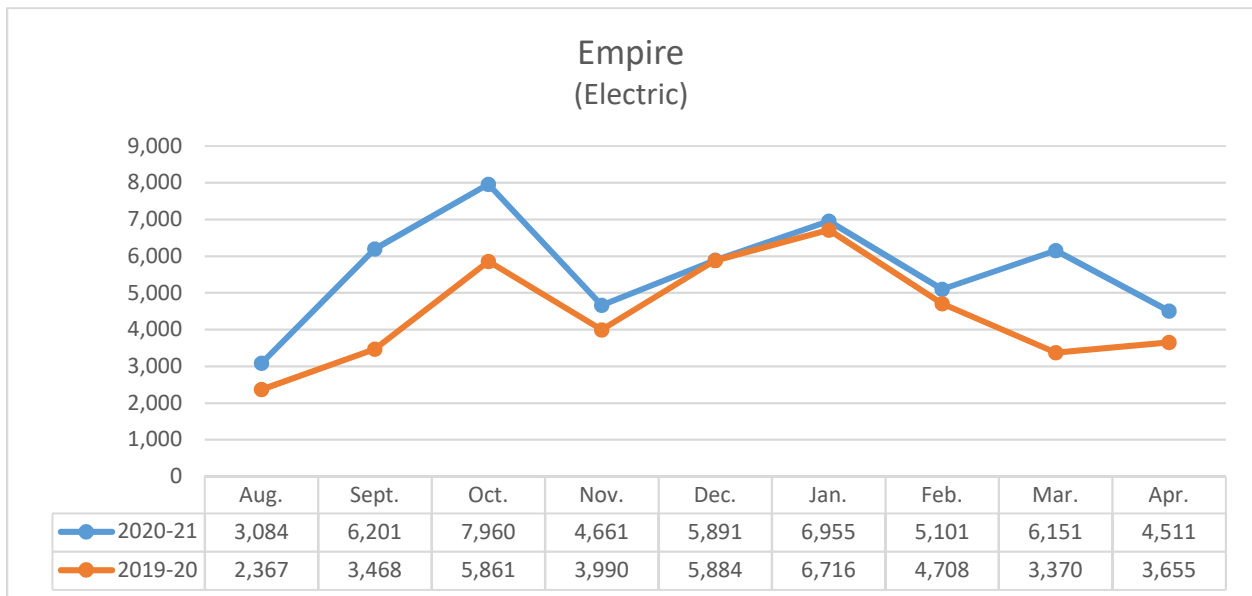
The previous data indicates that there were 30,607 Empire customers with past-due accounts in April 2021 versus none in April 2020 and approximately 17% fewer in April 2021 than in March 2021. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement 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 29,891 customers who were not disconnected in April 2021 versus none in April 2020 and approximately 19% less in April 2021 than in March 2021.

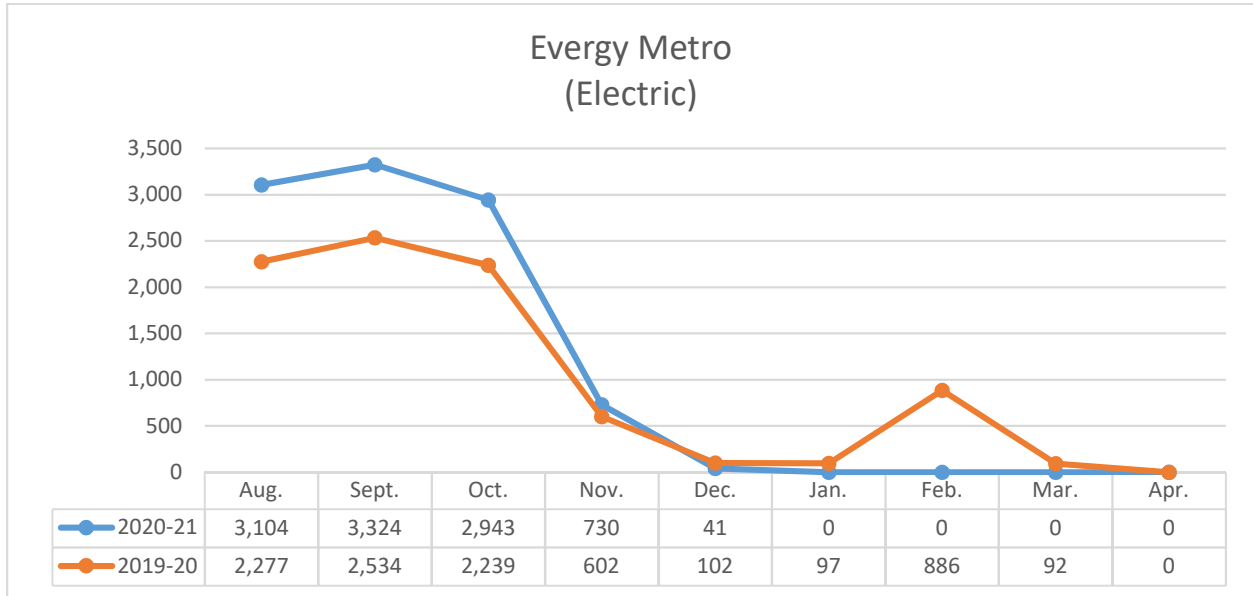
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 23% more Empire customers who participated in payment plans in April 2021 versus April 2020 and about 27% fewer in April 2021 than in March 2021.

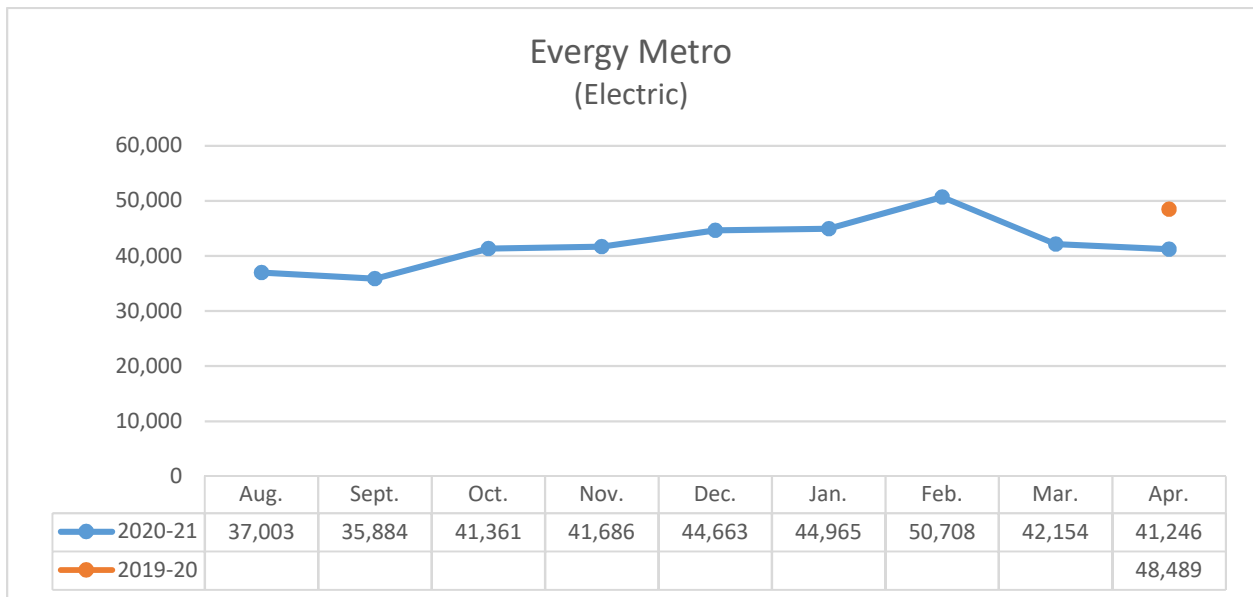
Questions 1 & 3 (Evergy Metro – Electric)

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



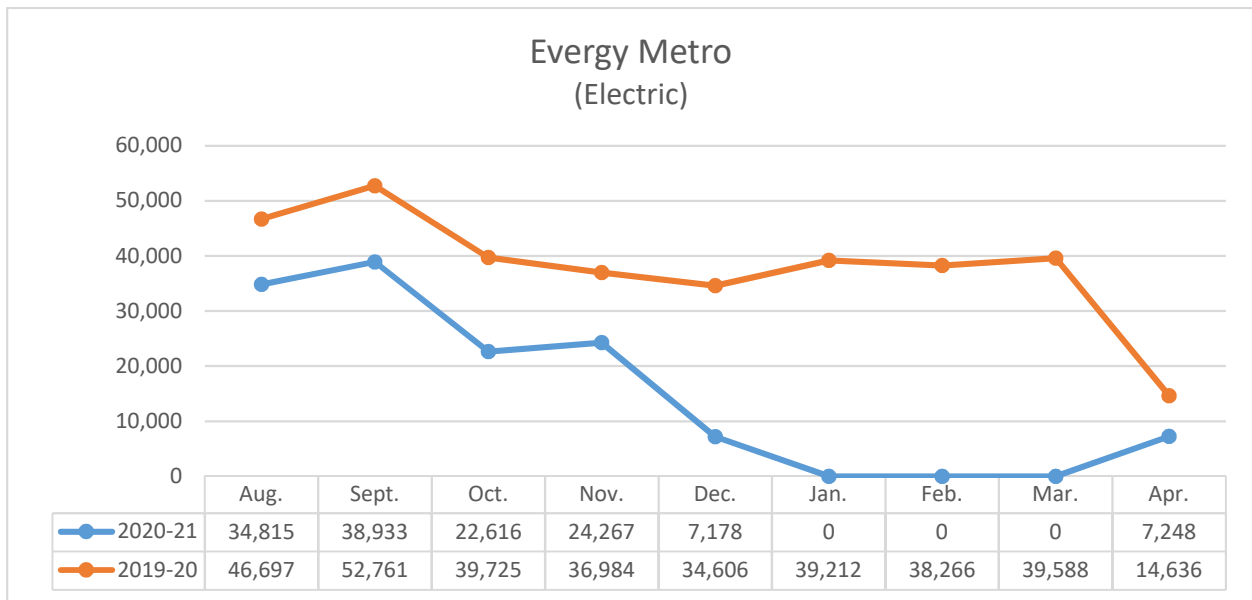
As shown in the previous graph, Evergy Metro performed no disconnections for non-payment in April 2021, none in April 2020, and none in March 2021. The number of actual disconnections by Evergy Metro in April 2021 was the same as the number projected by Evergy Metro for the same month.

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”



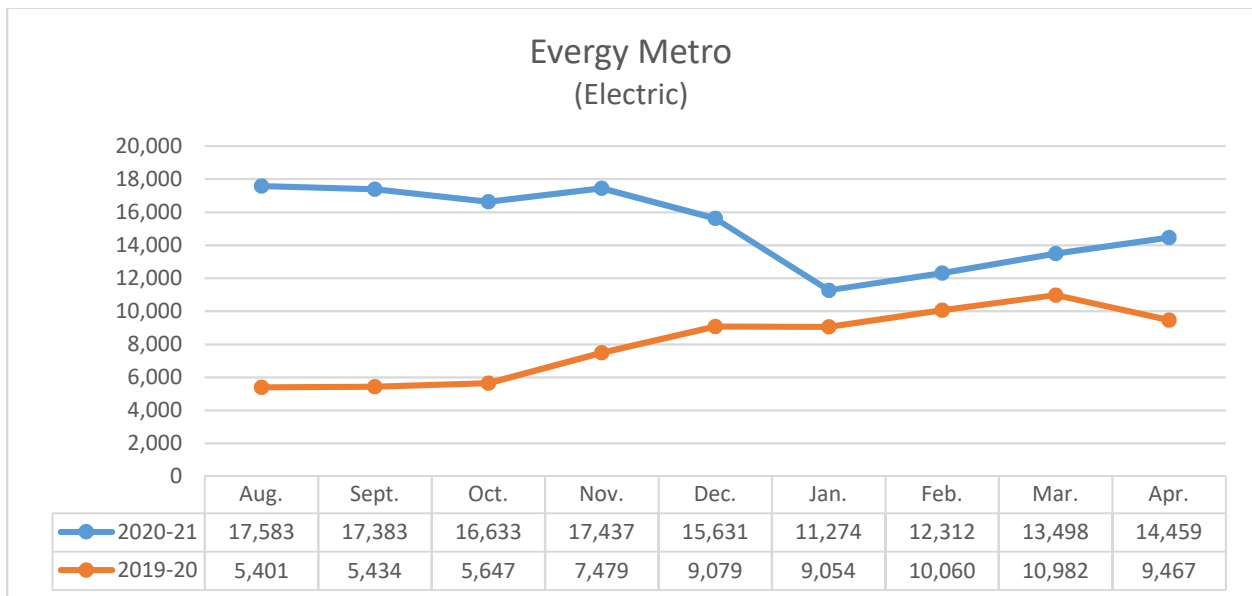
The previous data indicates that there were 15% fewer Evergy Metro customers with past-due accounts in April 2021 versus April 2020 and approximately 2% fewer in April 2021 than in March 2021. Evergy Metro defines past-due accounts as accounts that are more than 30 days in arrears.

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 50% fewer customers who were not disconnected in April 2021 versus April 2020 and 7,248 customers in April 2021 versus none in March 2021.

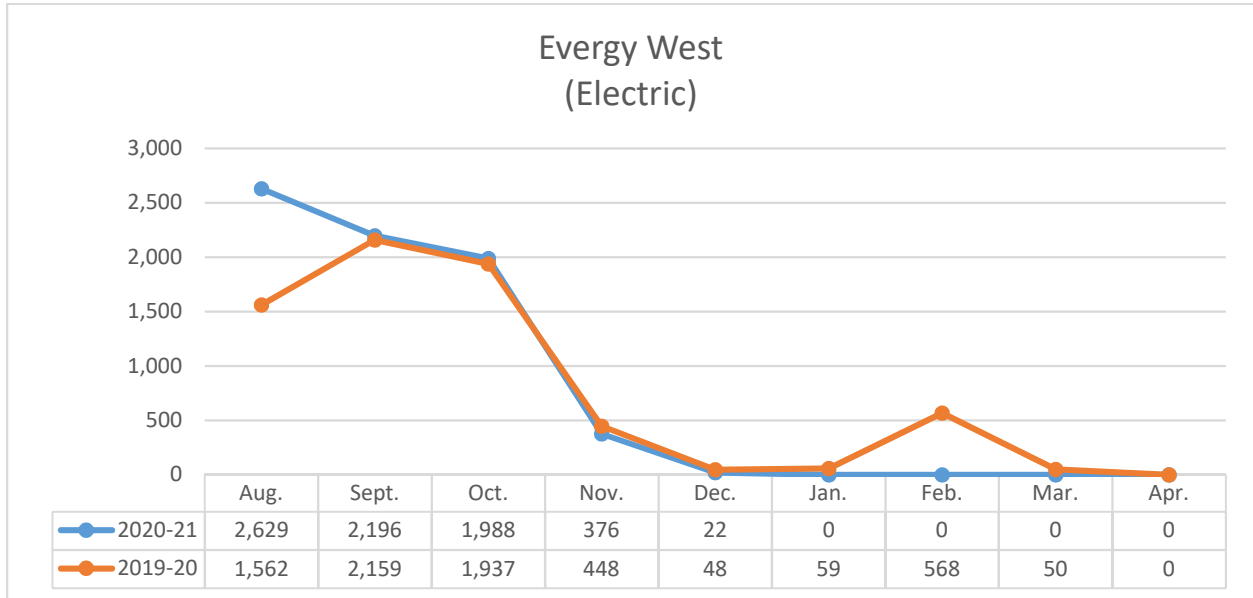
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 53% more Evergy Metro customers who participated in payment plans in April 2021 versus April 2020 and about 7% more in April 2021 than in March 2021.

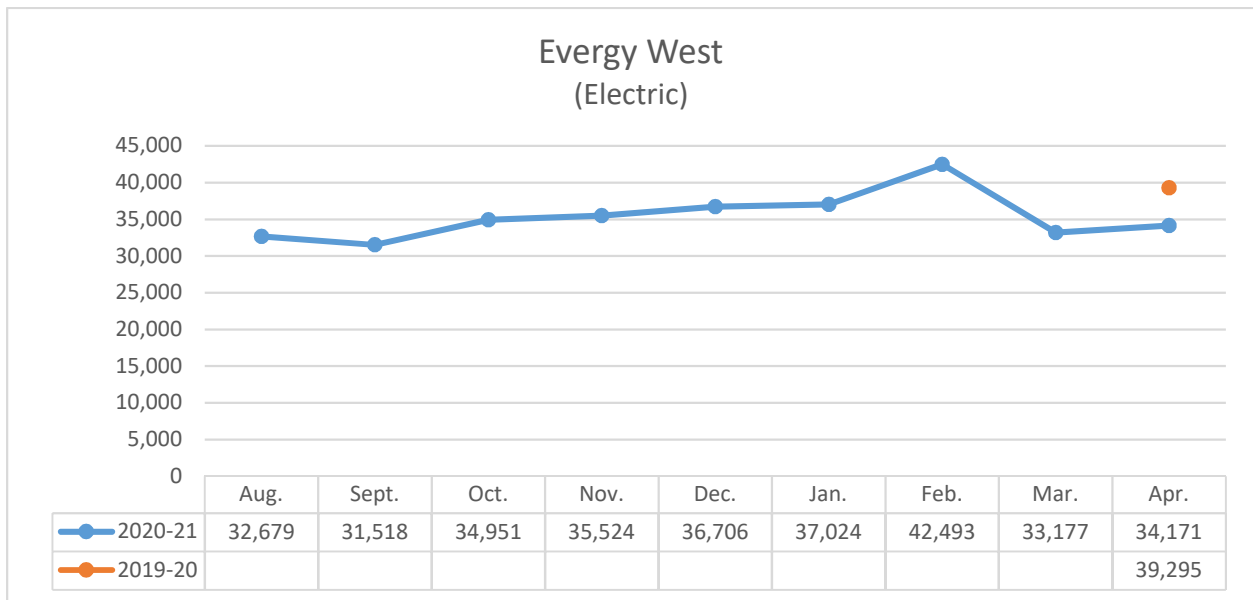
Questions 1 & 3 (Evergy West – Electric)

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



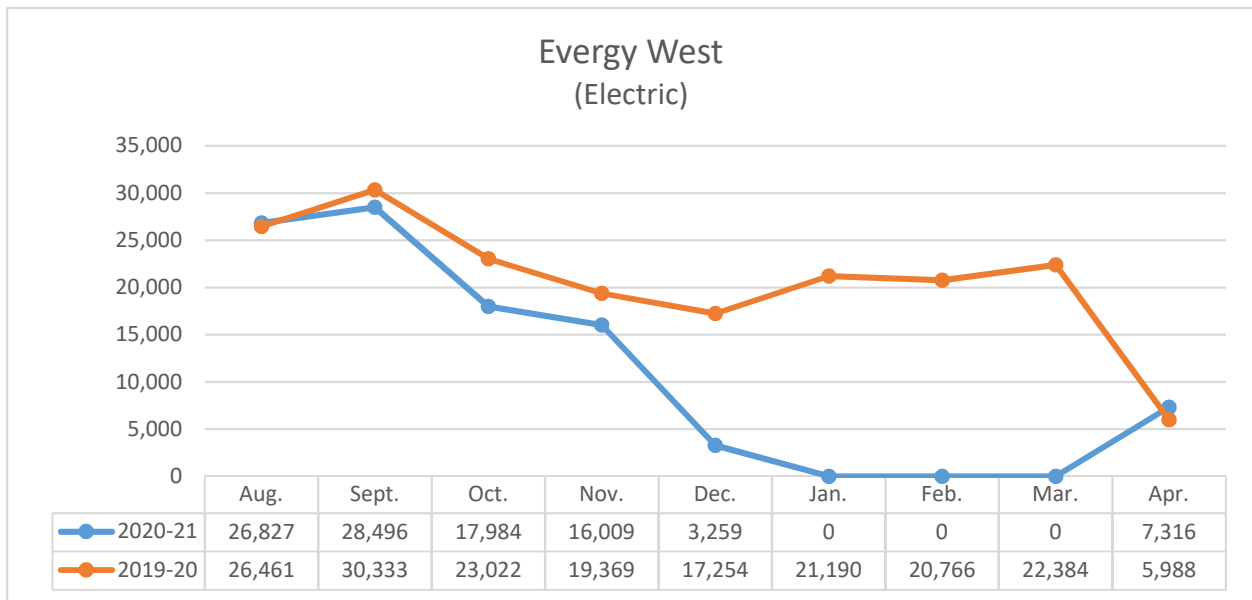
As shown in the previous graph, Evergy West performed no disconnections for non-payment in April 2021, none in April 2020, and none in March 2021. The number of actual disconnections by Evergy West in April 2021 was the same as the number projected by Evergy West for the same month.

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”



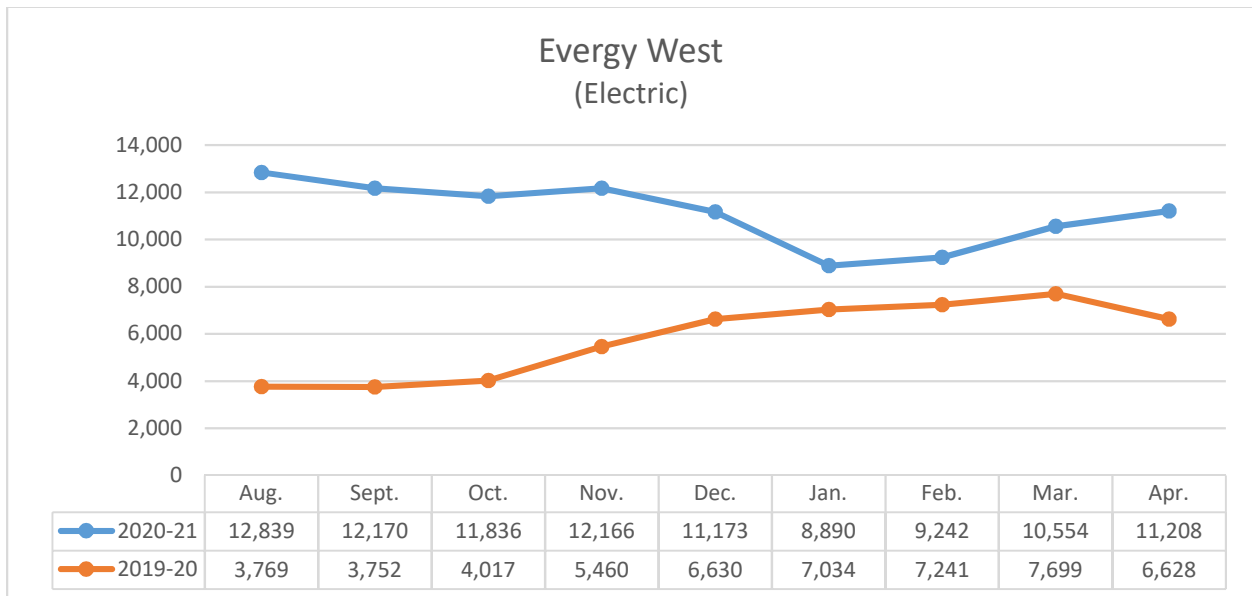
The previous data indicates that there were 13% fewer Evergy West customers with past-due accounts in April 2021 versus April 2020 and approximately 3% more in April 2021 than in March 2021. Evergy West defines past-due accounts as accounts that are more than 30 days in arrears.

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 22% more customers who were not disconnected in April 2021 versus April 2020 and 7,316 customers in April 2021 versus none in March 2021.

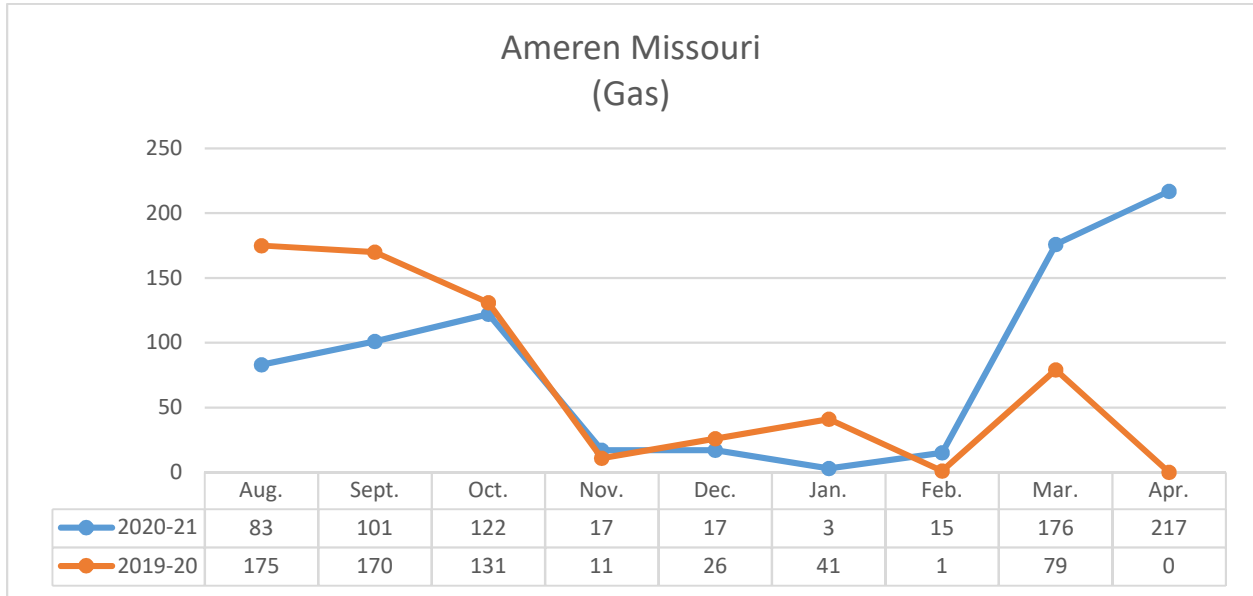
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 69% more Evergy West customers who participated in payment plans in April 2021 versus April 2020 and about 6% more in April 2021 than in March 2021.

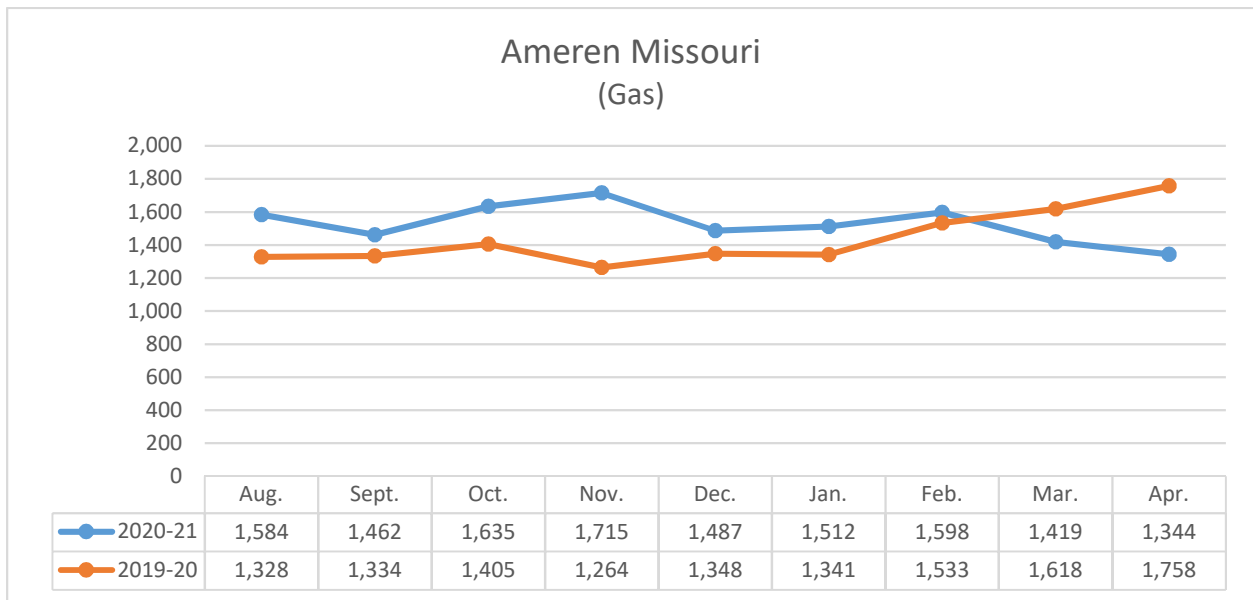
Questions 1 & 3 (Ameren Missouri – Gas)

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



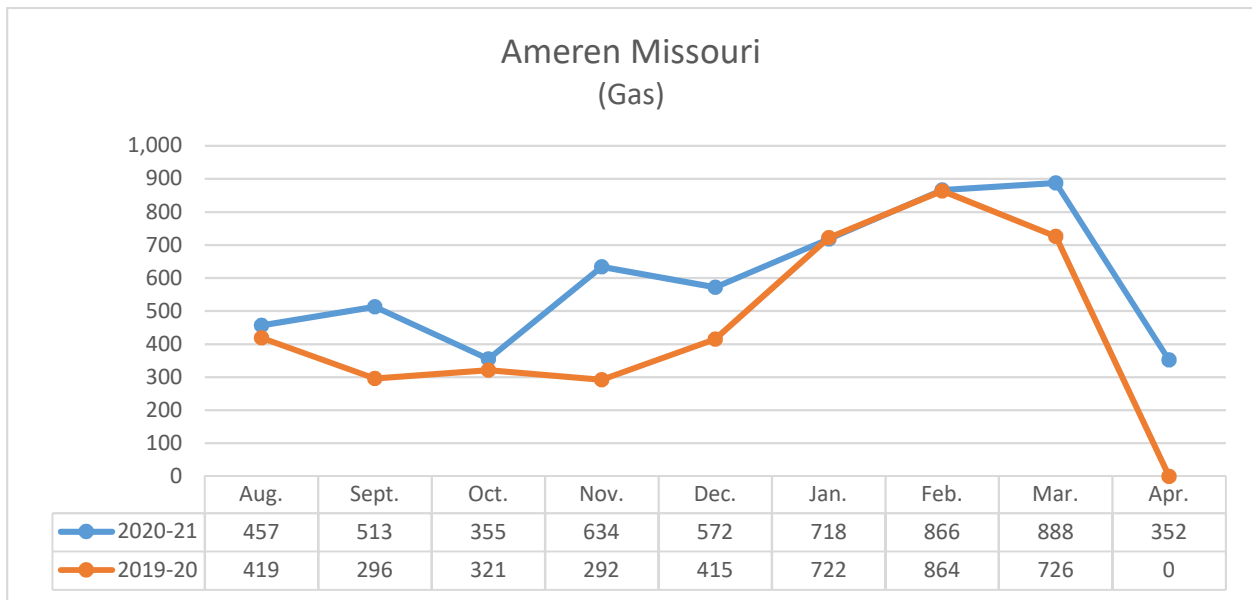
As shown in the previous graph, Ameren Missouri performed 217 disconnections for non-payment in April 2021 versus none in April 2020 and about 23% more in April 2021 than in March 2021. Estimated data was not provided that would enable Staff to calculate a comparison with the number projected by Ameren 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”



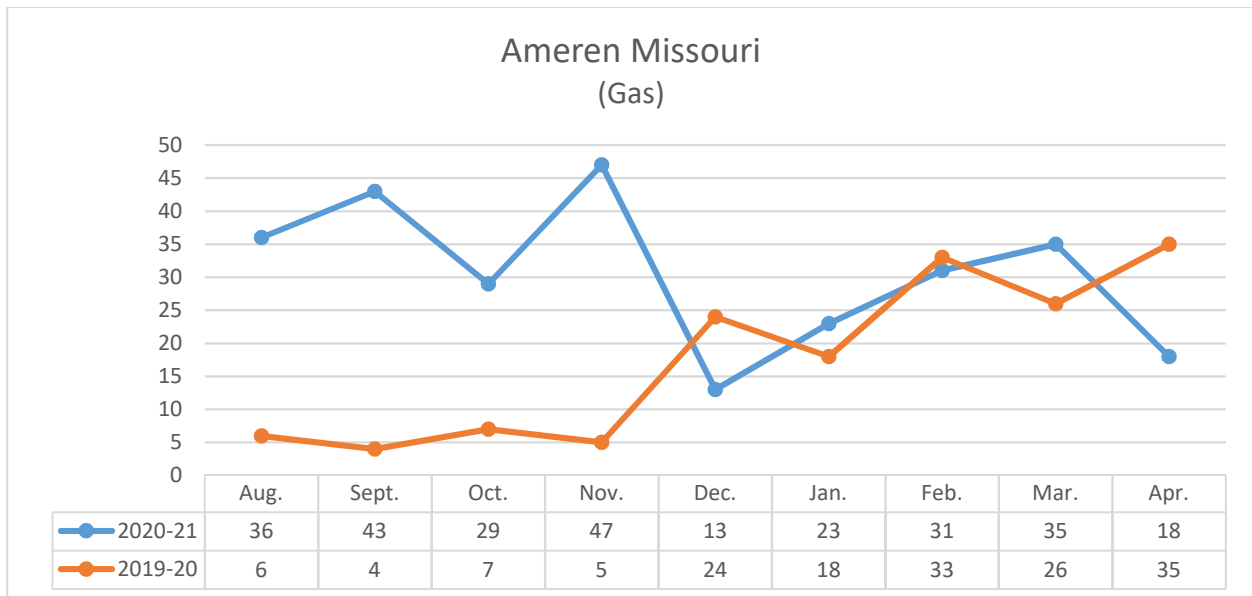
The previous data indicates that there were approximately 24% fewer Ameren Missouri customers with past-due accounts in April 2021 versus April 2020 and approximately 5% fewer in April 2021 than in March 2021. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

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 352 customers who were not disconnected in April 2021 versus none in April 2020 and approximately 60% less in April 2021 than in March 2021.

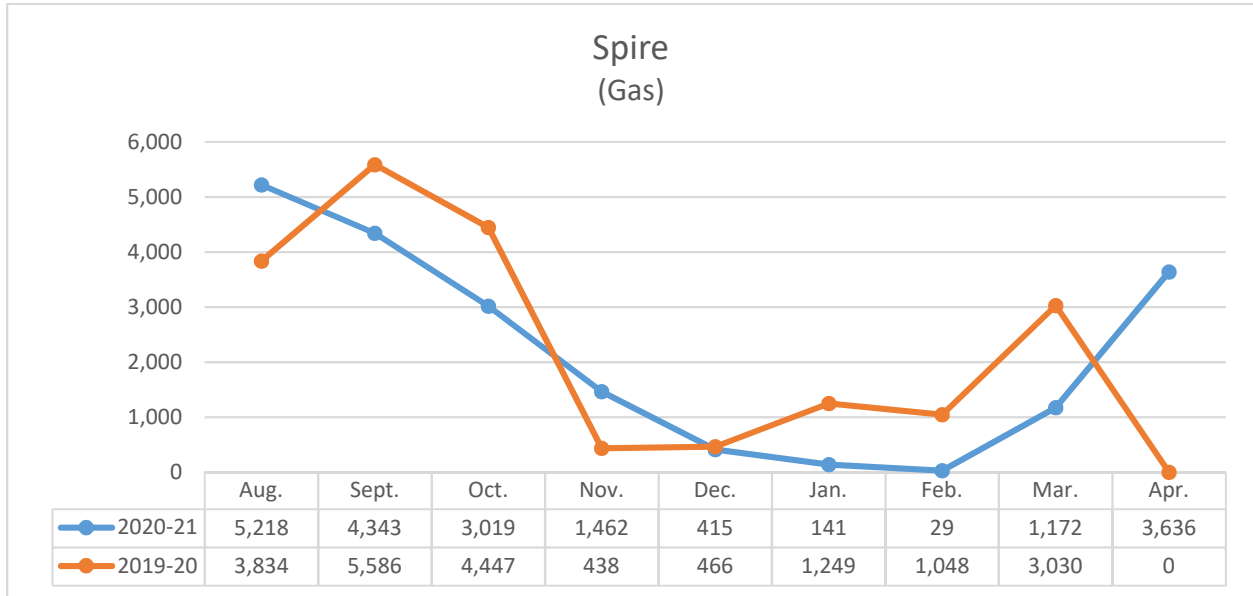
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 49% fewer Ameren Missouri customers who participated in payment plans in April 2021 versus April 2020 and about 49% fewer in April 2021 than in March 2021.

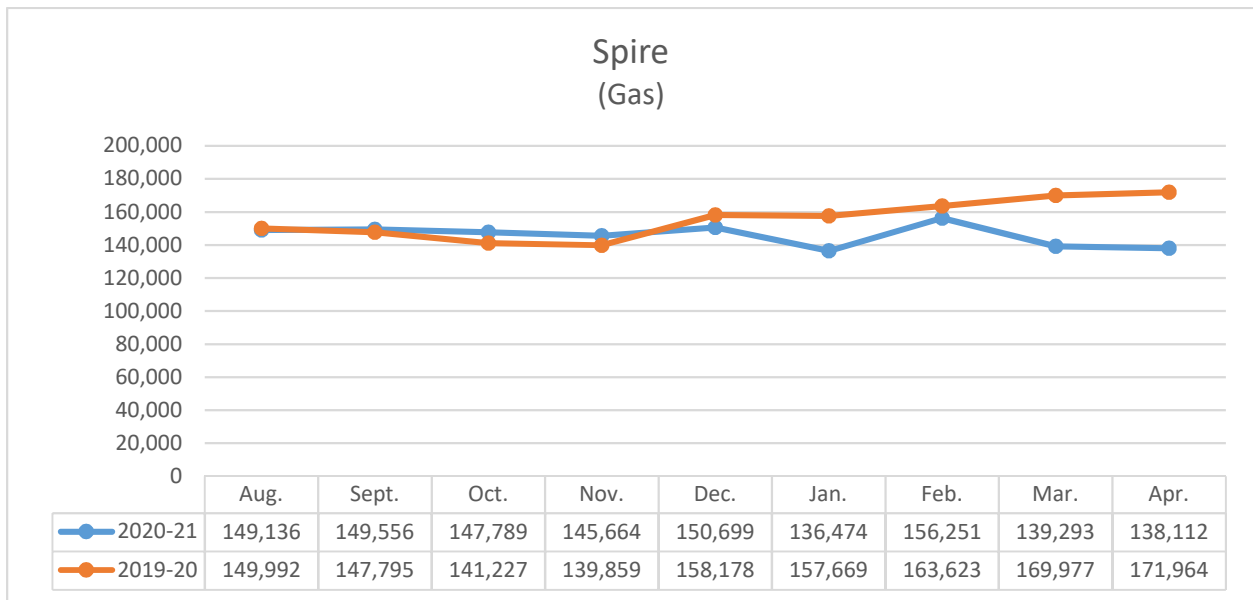
Questions 1 & 3 (Spire - Gas)

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



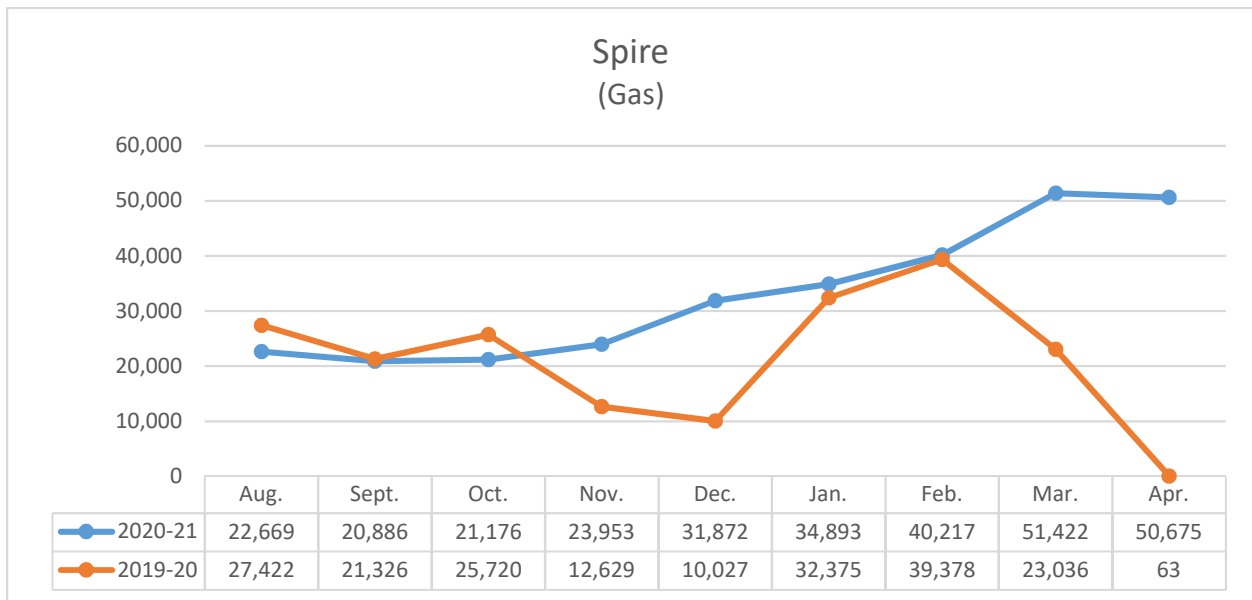
As shown in the previous graph, Spire performed 3,636 disconnections for non-payment in April 2021 versus none in April 2020 and approximately 210% more in April 2021 than in March 2021. The number of actual disconnections by Spire in April 2021 was 48% below the amount projected by Spire for the same 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”



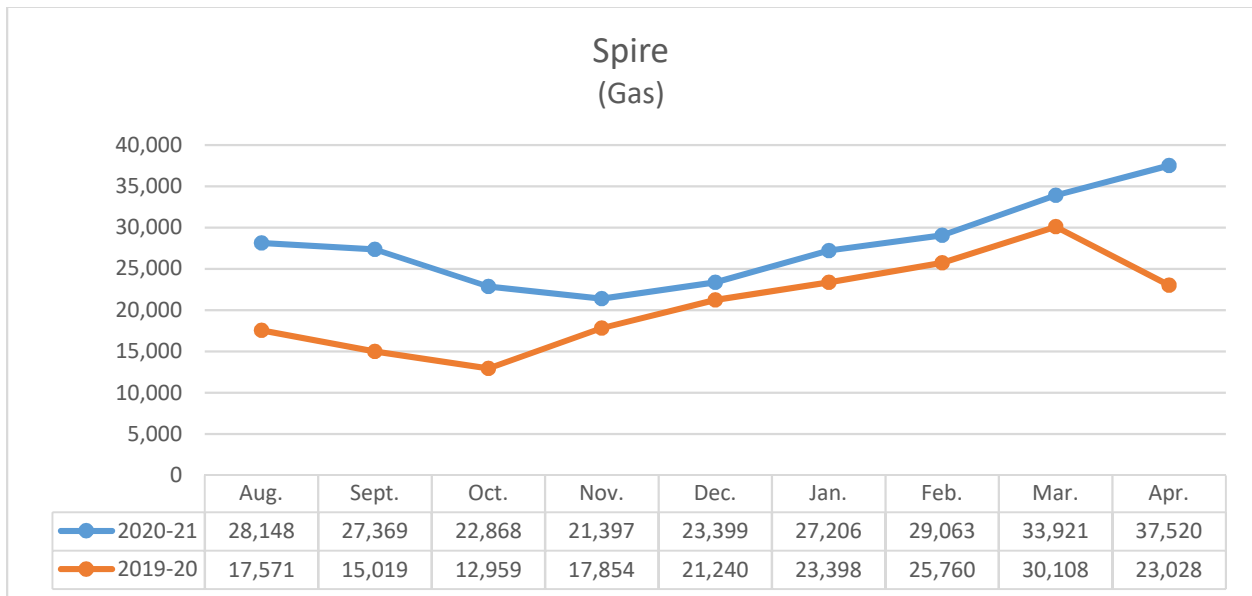
The previous data indicates that there were about 20% fewer Spire customers with past-due accounts in April 2021 versus April 2020 and approximately 1% less in April 2021 than in March 2021. Spire reported that past-due accounts are defined as accounts with arrear amounts owed for over 30 days that were 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 50,675 customers who were not disconnected in April 2021 versus 63 in April 2020 and approximately 1% fewer in April 2021 than in March 2021.

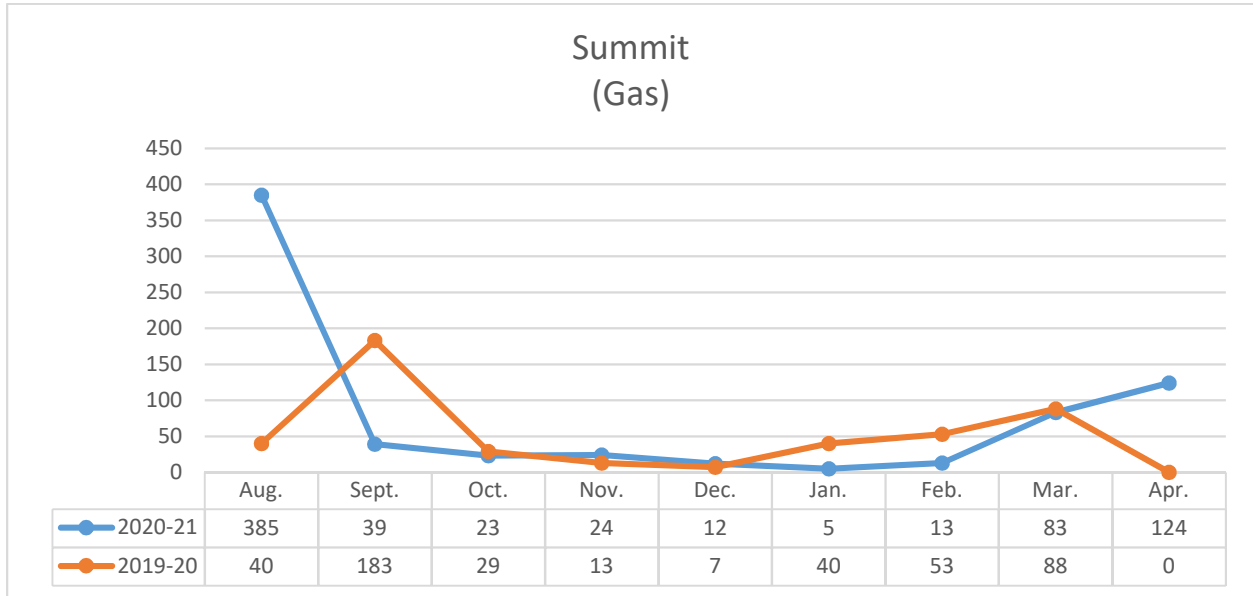
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 63% more Spire customers who participated in payment plans in April 2021 versus April 2020 and about 11% more in April 2021 than in March 2021.

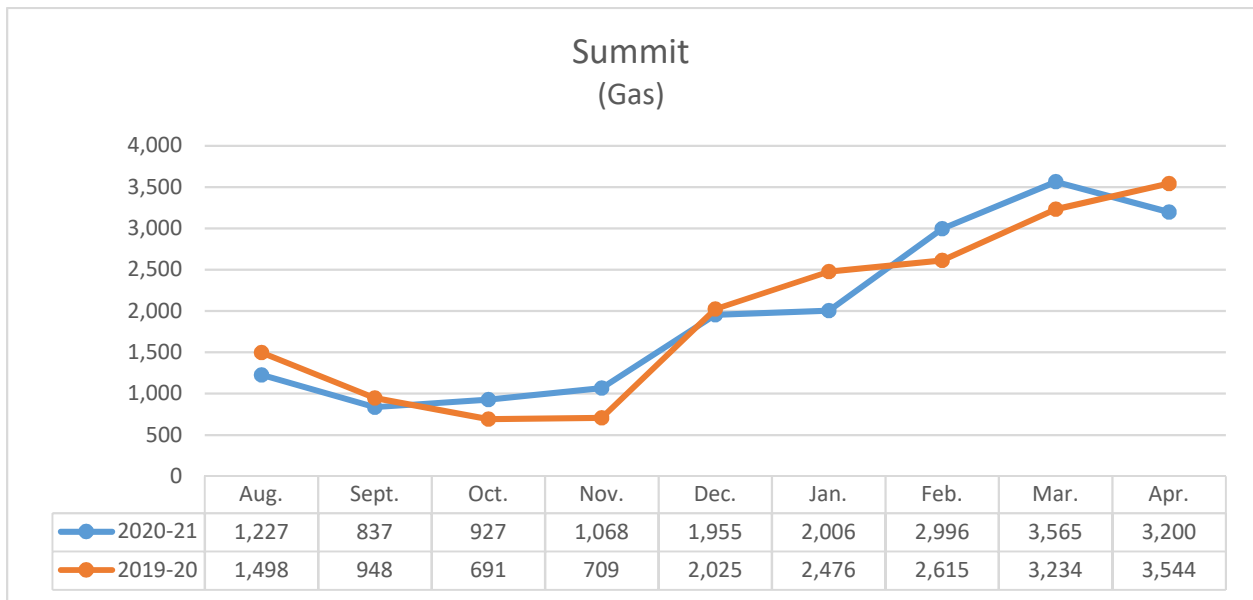
Questions 1 & 3 (Summit - Gas)

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



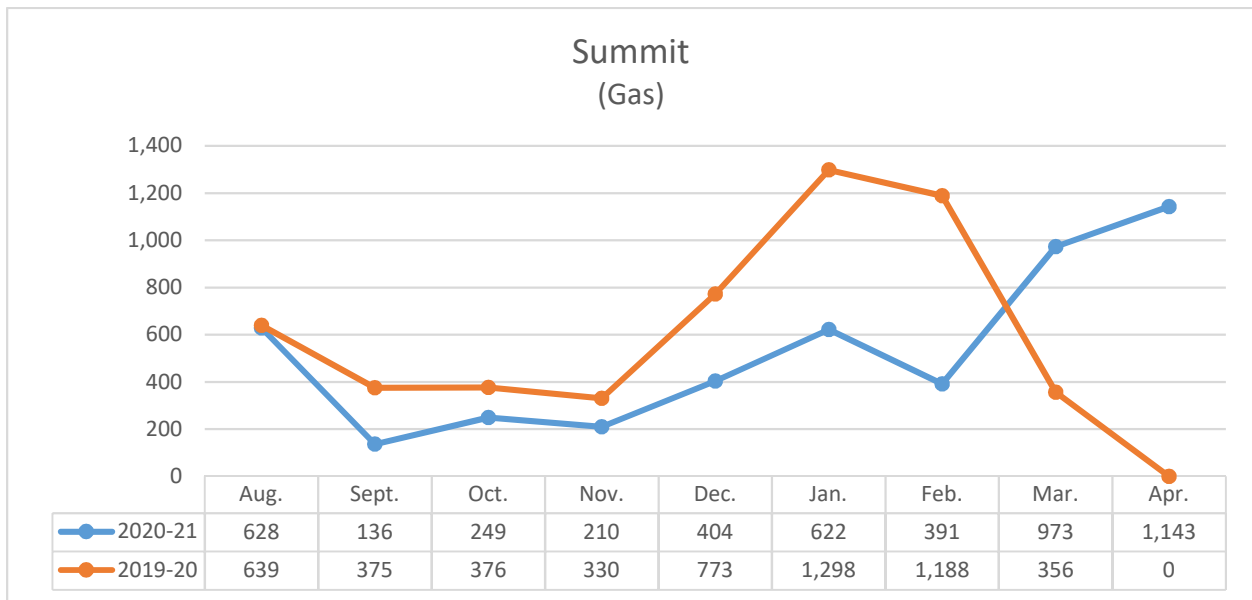
As shown in the previous graph, Summit performed 124 disconnections for non-payment in April 2021 versus none in April 2020 and about 49% more in April 2021 than in March 2021. The number of actual disconnections by Summit in April 2021 was about 40% below the amount projected by Summit for the same 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”



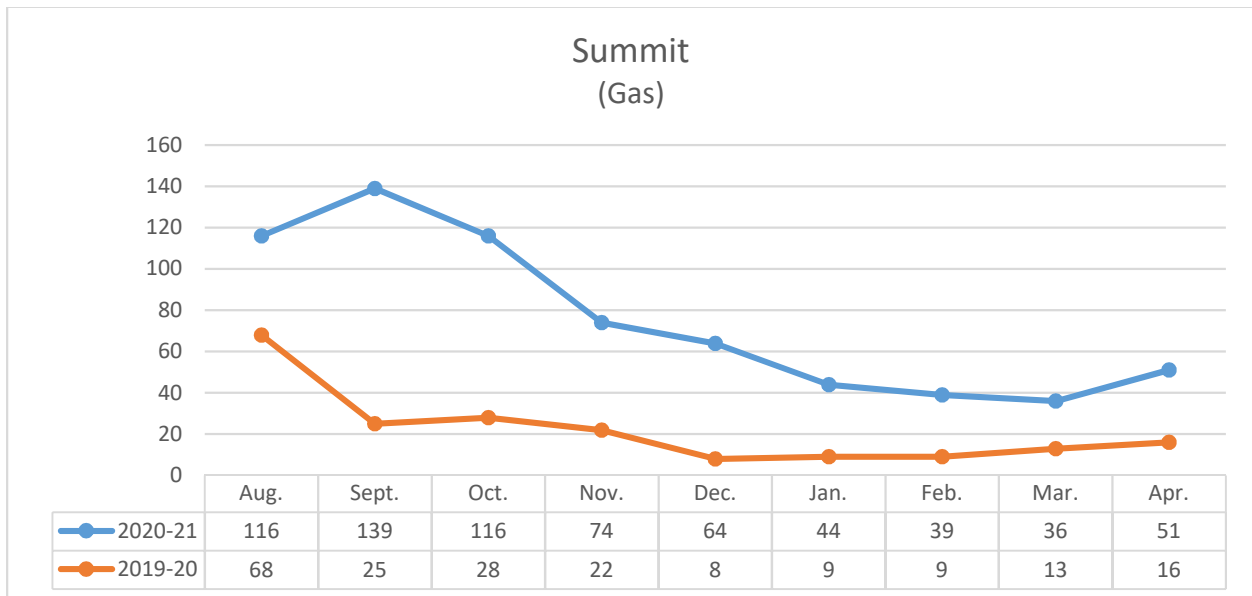
The previous data indicates that there were about 10% fewer Summit customers with past-due accounts in April 2021 versus April 2020 and approximately 10% less in April 2021 than in March 2021. Summit did not respond how it defines past-due accounts.

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 1,143 customers who were not disconnected in April 2021 versus none in April 2020 and approximately 17% more in April 2021 than in March 2021.

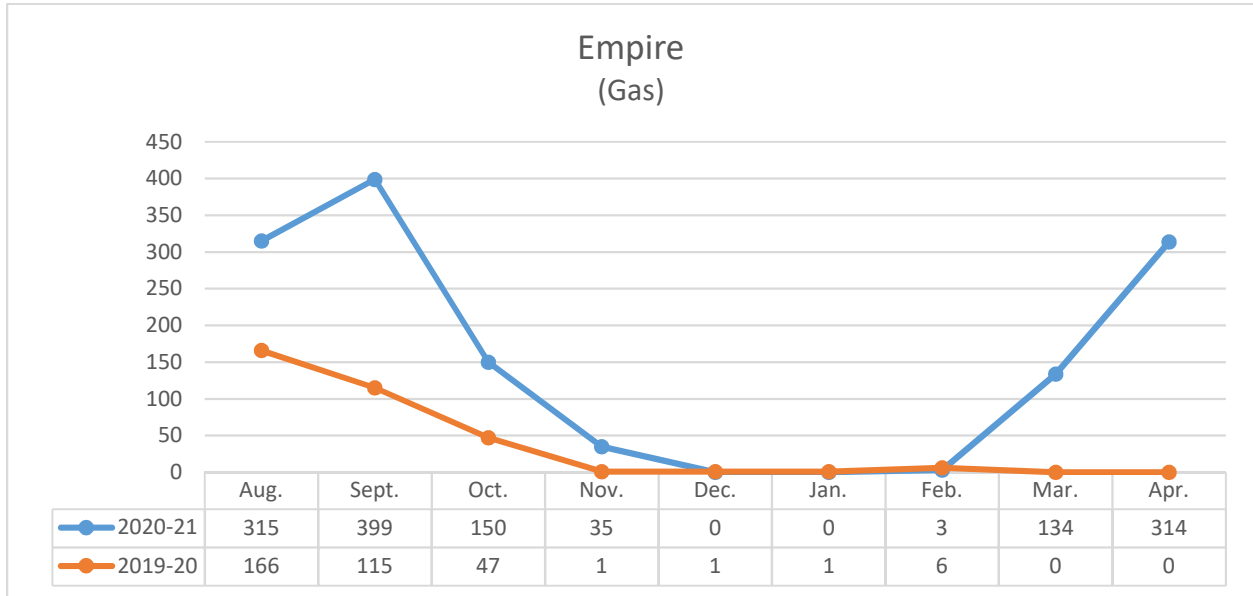
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 219% more Summit customers who participated in payment plans in April 2021 versus April 2020 and about 42% more in April 2021 than in March 2021.

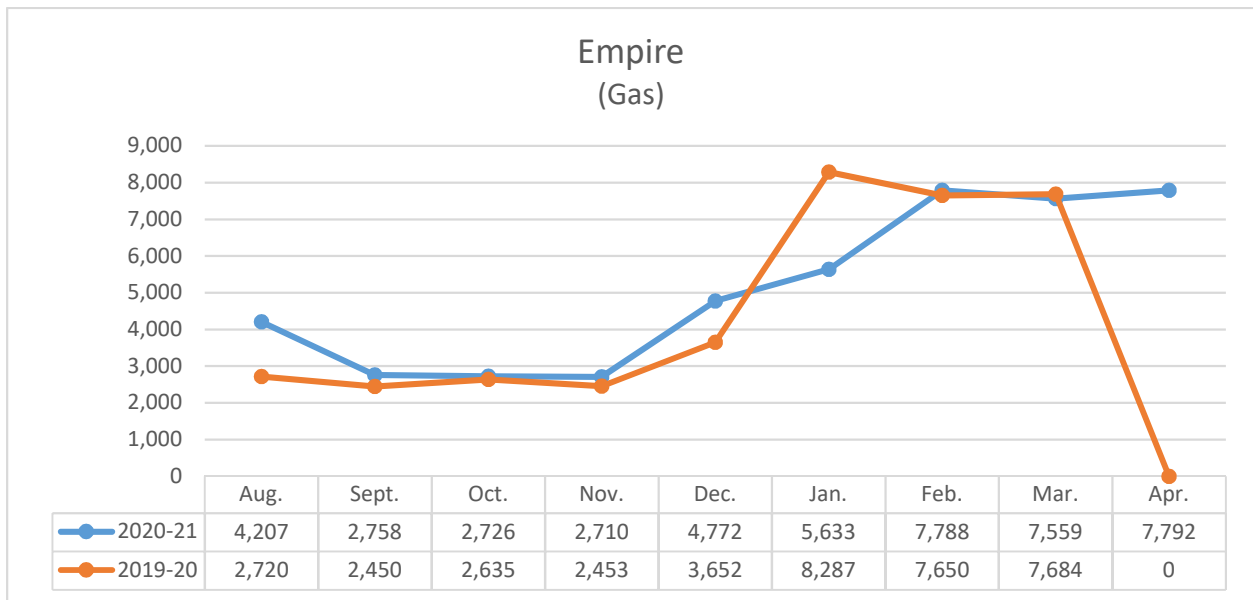
Questions 1 & 3 (Empire - Gas)

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



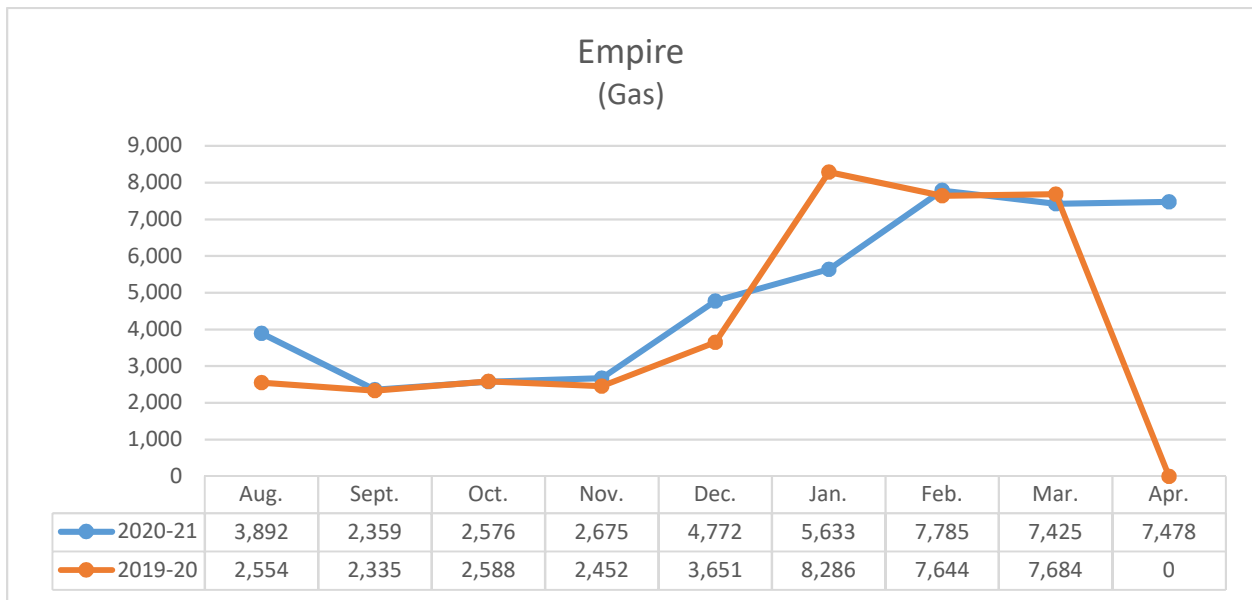
As shown in the previous graph, Empire performed 314 disconnections for non-payment in April 2021 versus none in April 2020 and about 134% more in April 2021 than in March 2021. The number of actual disconnections by Empire in April 2021 was about 14% above the amount projected by Empire for the same 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”



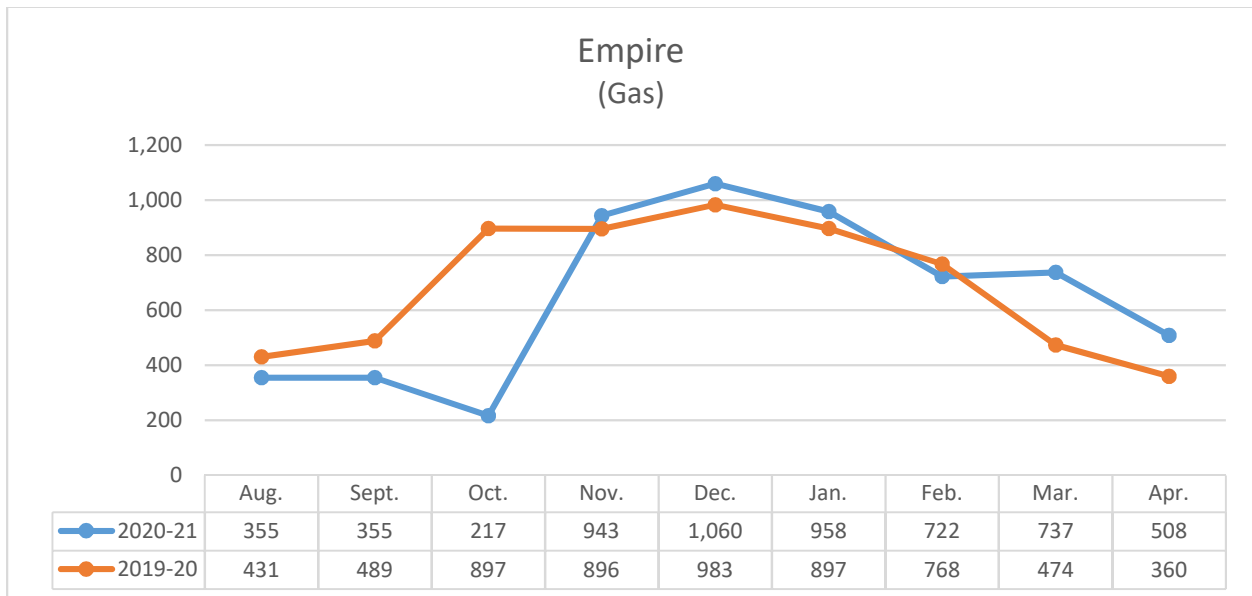
The previous data indicates that there were 7,792 Empire customers with past-due accounts in April 2021 versus none in April 2020 and approximately 3% more in April 2021 than in March 2021. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement due 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 7,478 customers who were not disconnected in April 2021 versus none in April 2020 and approximately 1% more in April 2021 than in March 2021.

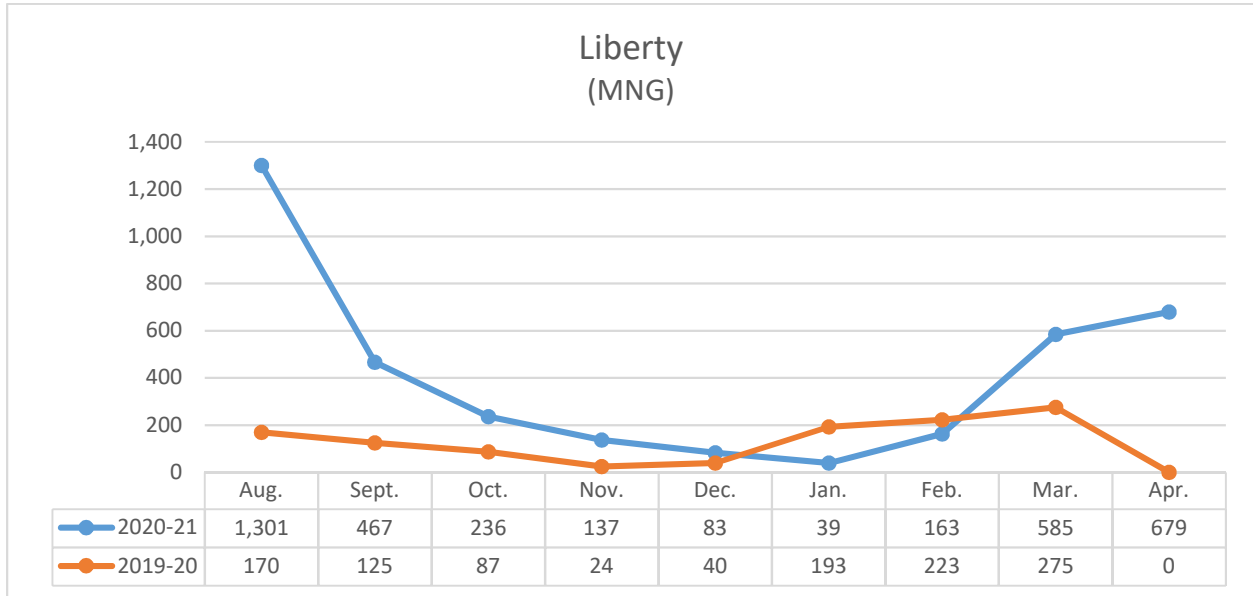
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 41% more Empire customers who participated in payment plans in April 2021 versus April 2020 and about 31% fewer in April 2021 than in March 2021.

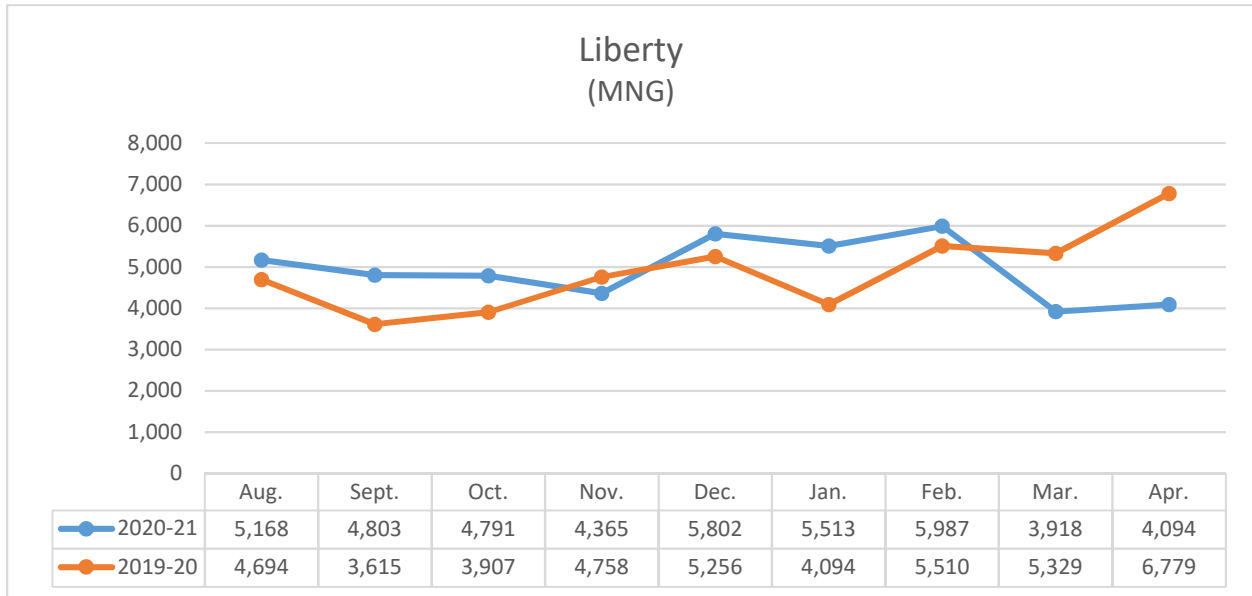
Questions 1 & 3 (Liberty (MNG) - Gas)

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



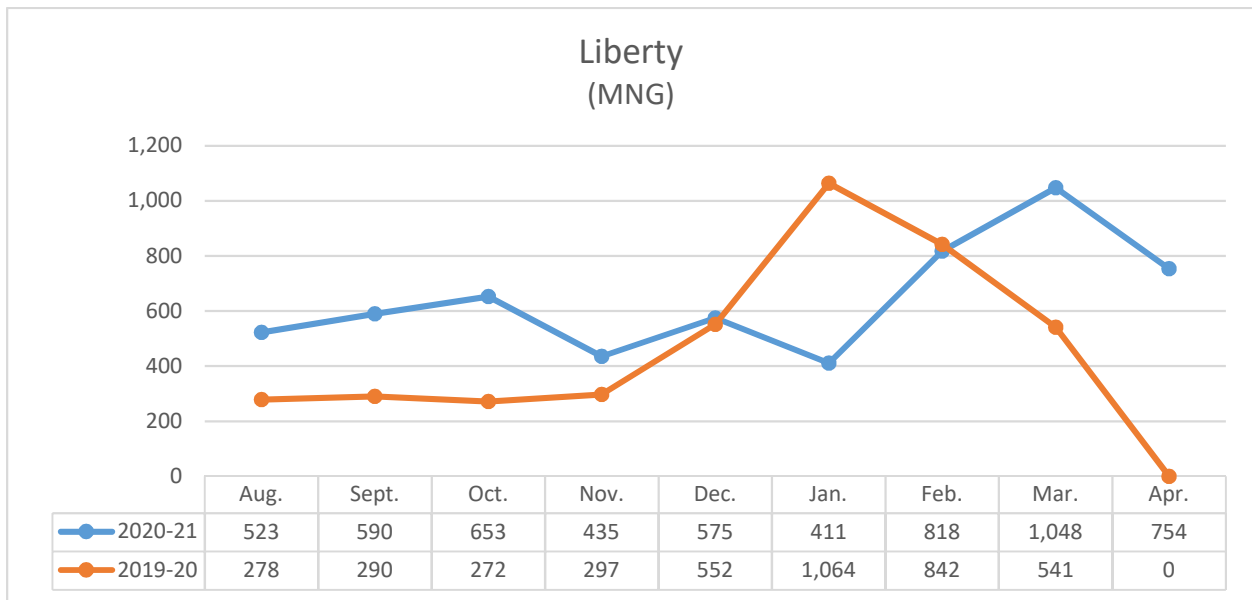
As shown in the previous graph, Liberty (MNG) performed 679 disconnections for non-payment in April 2021 versus none in April 2020 and about 16% more in April 2021 than in March 2021. The number of actual disconnections by Liberty (MNG) in April 2021 was about 36% above the amount projected by Liberty (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”



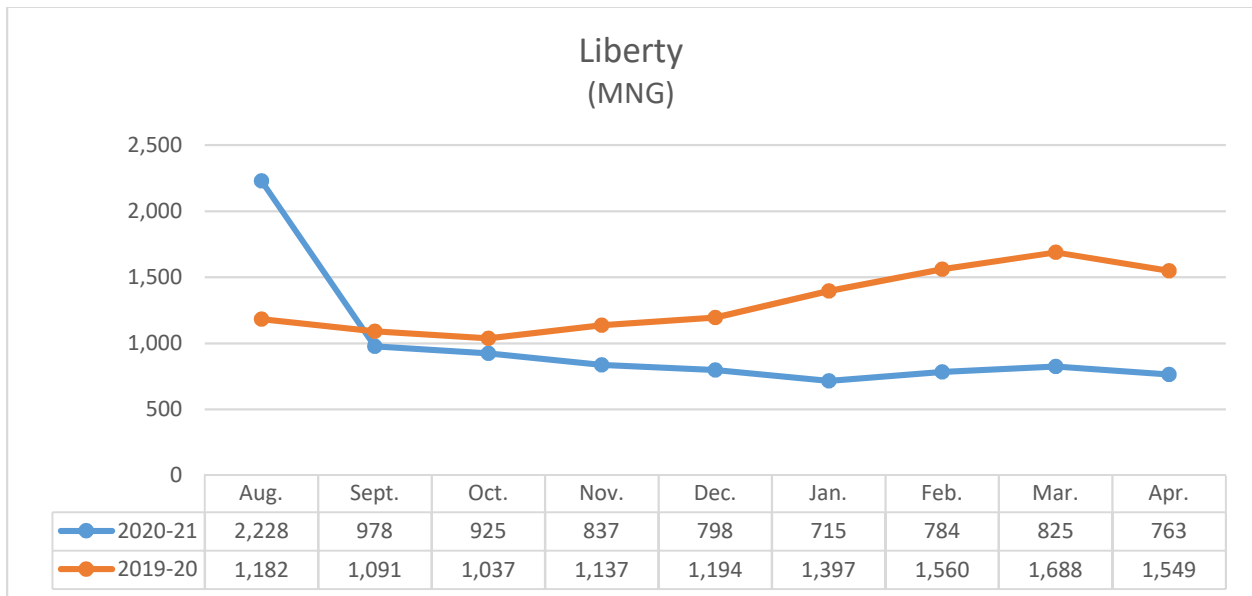
The previous data indicates that there were approximately 40% fewer Liberty (MNG) customers with past-due accounts in April 2021 versus April 2020 and approximately 4% more in April 2021 than in March 2021. Liberty (MNG) reported that it considers accounts past due when they have a past due balance for 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 754 customers who were not disconnected in April 2021 versus none in April 2020 and approximately 28% fewer in April 2021 than in March 2021.

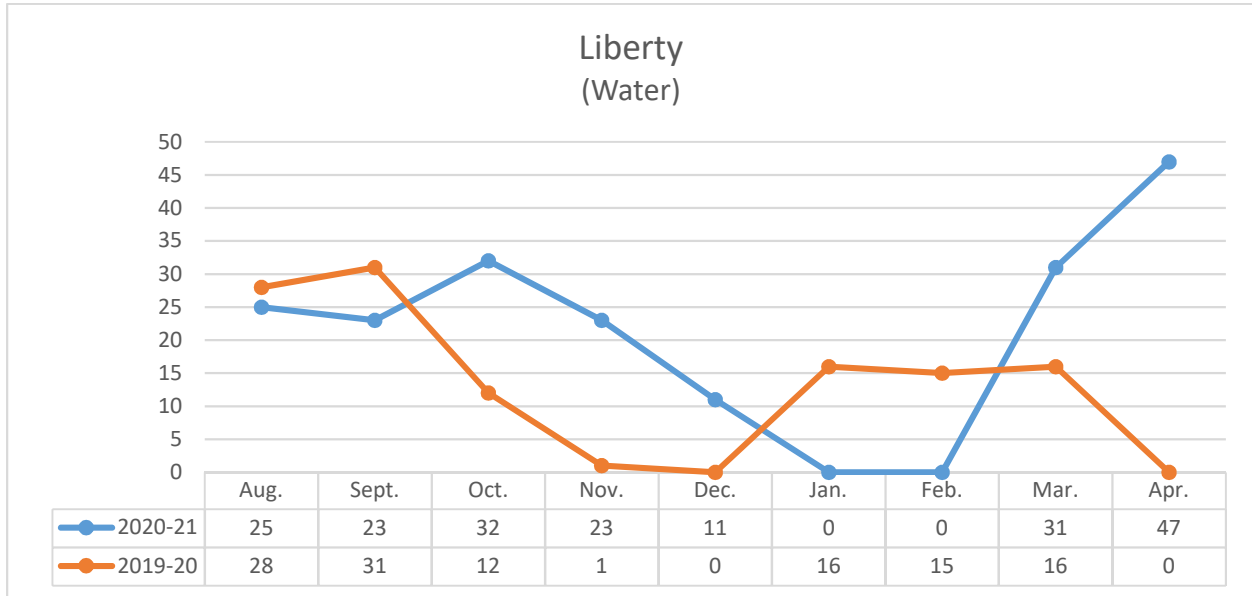
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 51% fewer Liberty (MNG) customers who participated in payment plans in April 2021 versus April 2020 and about 8% fewer in April 2021 than in March 2021.

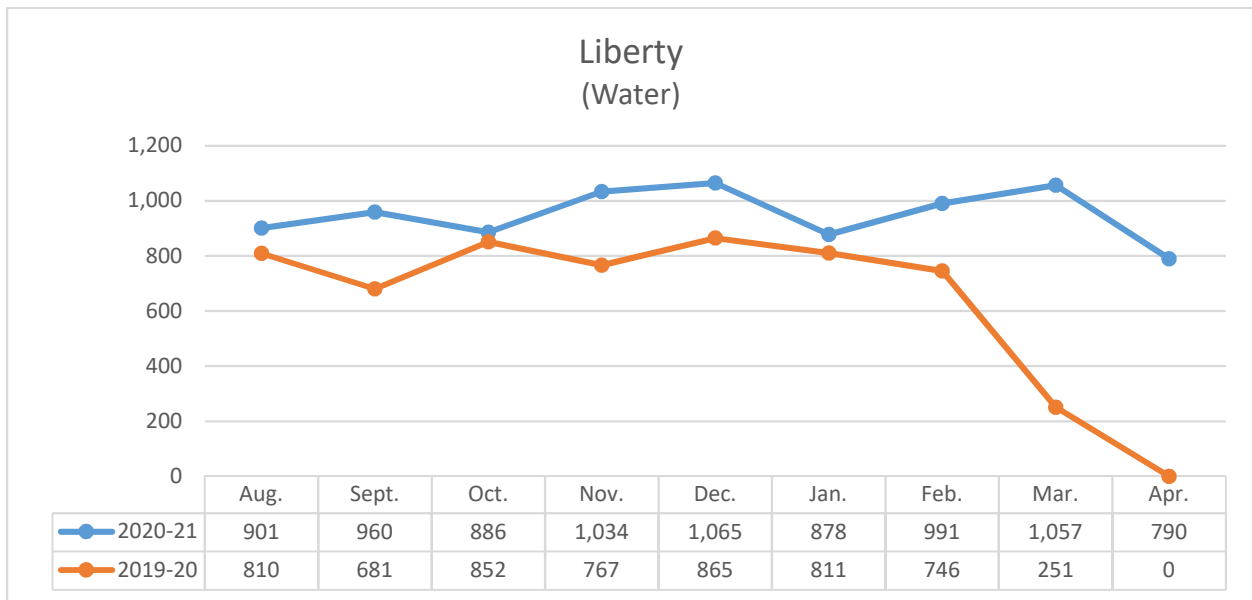
Questions 1 & 3 (Liberty - Water)

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



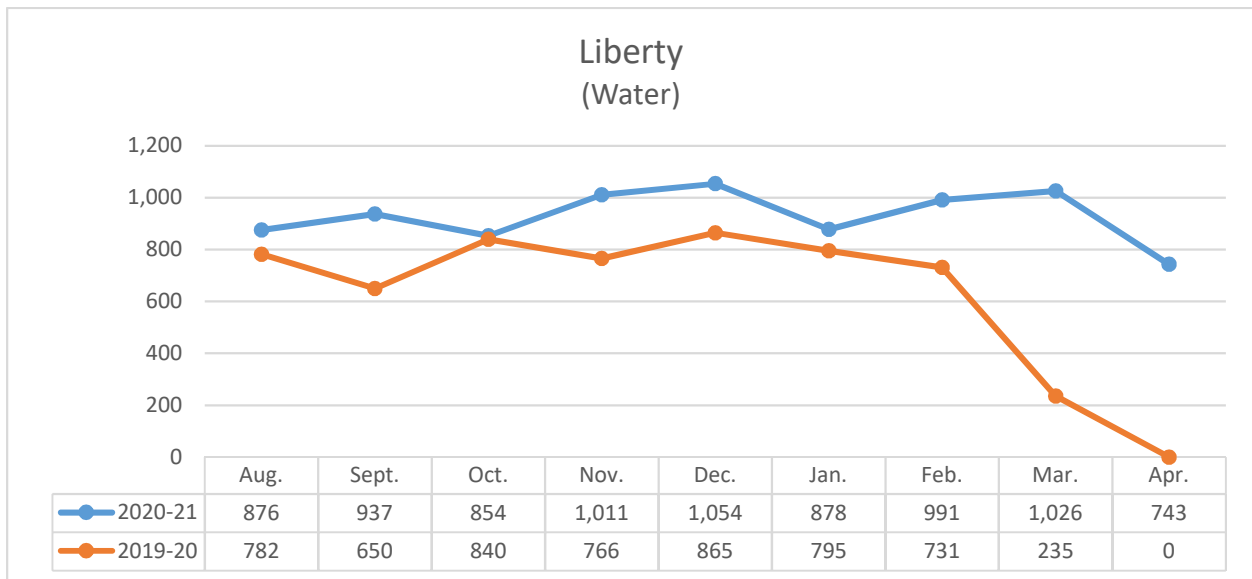
As shown in the previous graph, Liberty performed 47 disconnections for non-payment in April 2021 versus none in April 2020 and about 52% more in April 2021 than in March 2021. The number of actual disconnections by Liberty in April 2021 was about 22% below the amount projected by Liberty for the same 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”



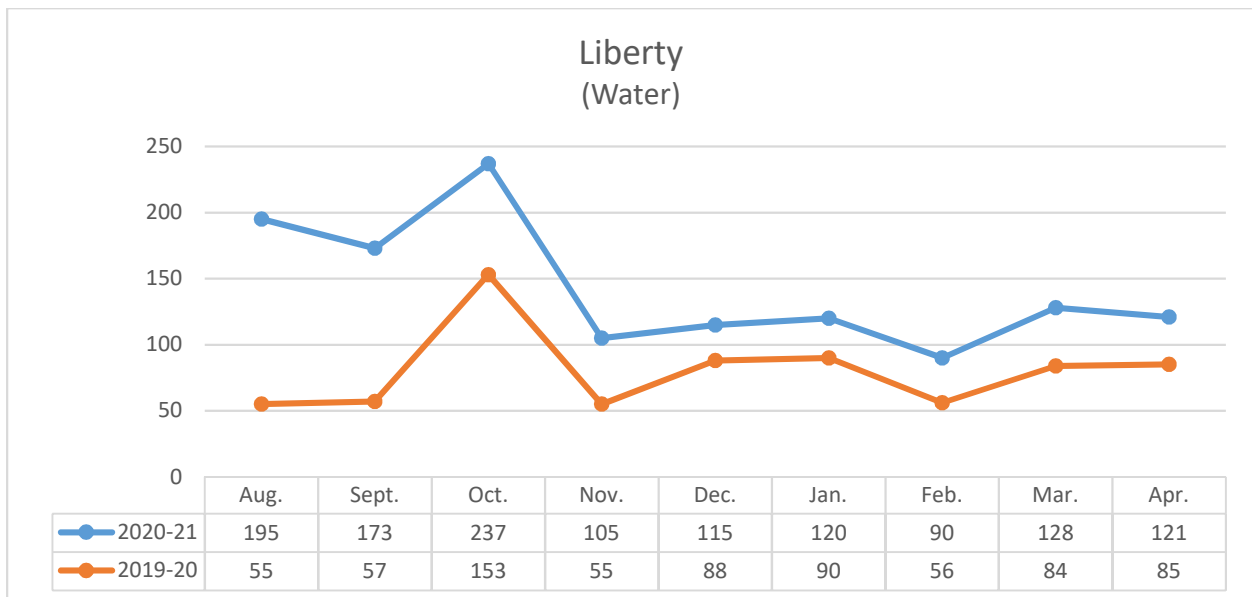
The previous data indicates that there were 790 Liberty customers with past-due accounts in April 2021 versus none in April 2020 and approximately 25% fewer in April 2021 than in March 2021. Liberty reported that it considers accounts past due when they have a past due balance for greater than two days 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’s data, for those customers who received a final disconnection notice there were 743 customers who were not disconnected in April 2021 versus none in April 2020 and approximately 28% fewer in April 2021 than in March 2021.

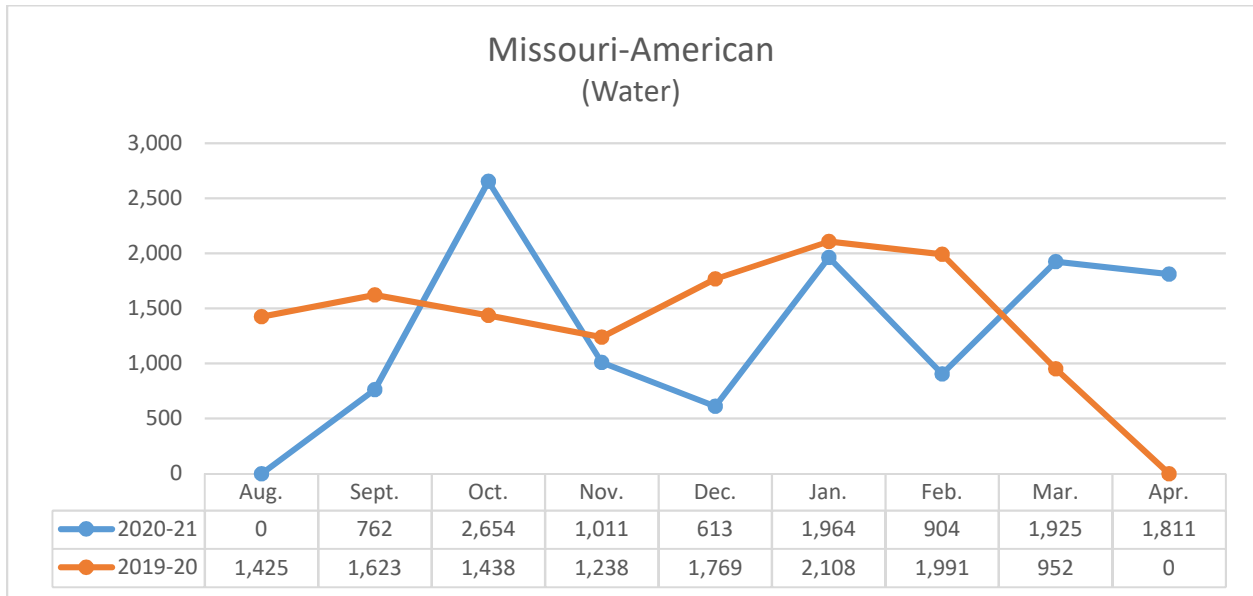
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 42% more Liberty customers who participated in payment plans in April 2021 versus April 2020 and about 5% fewer in April 2021 than in March 2021.

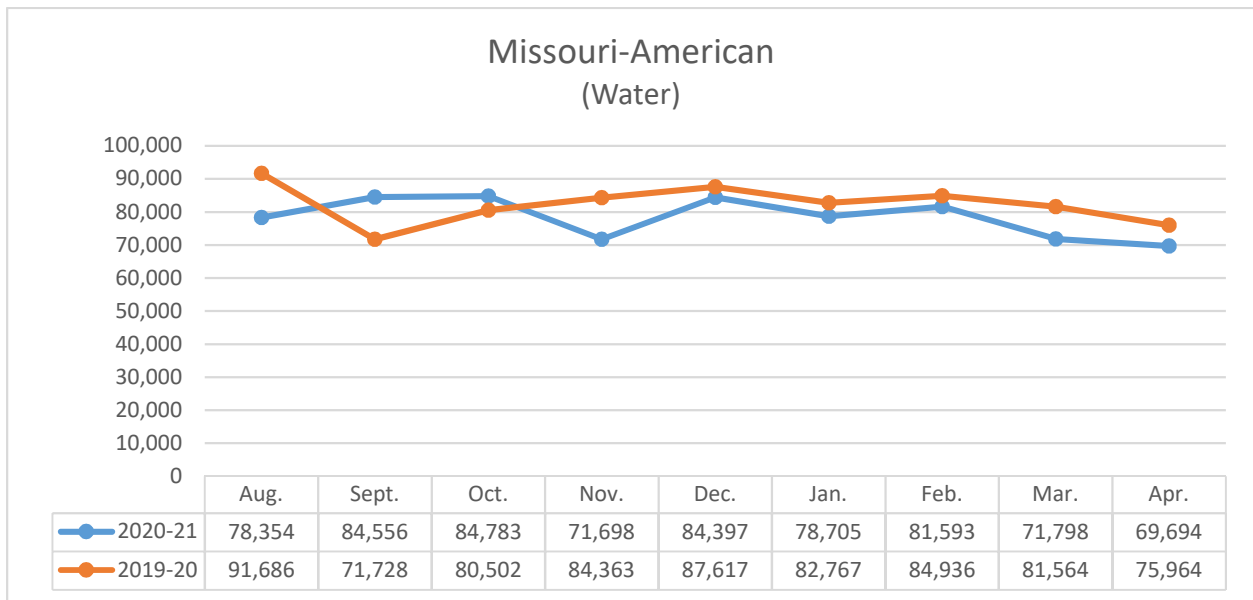
Questions 1 & 3 (Missouri-American - Water)

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



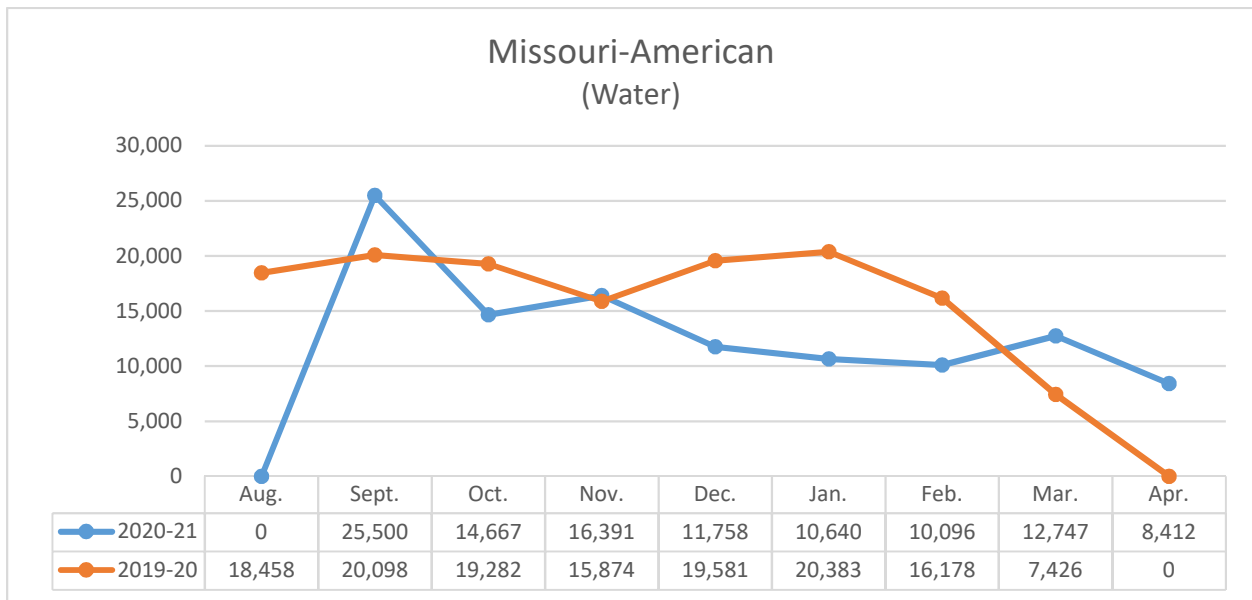
As shown in the previous graph, Missouri-American performed 1,811 disconnections for non-payment in April 2021 versus none in April 2020 and about 6% fewer in April 2021 than in March 2021. Missouri-American does not forecast the number of disconnections for non-payment.

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”



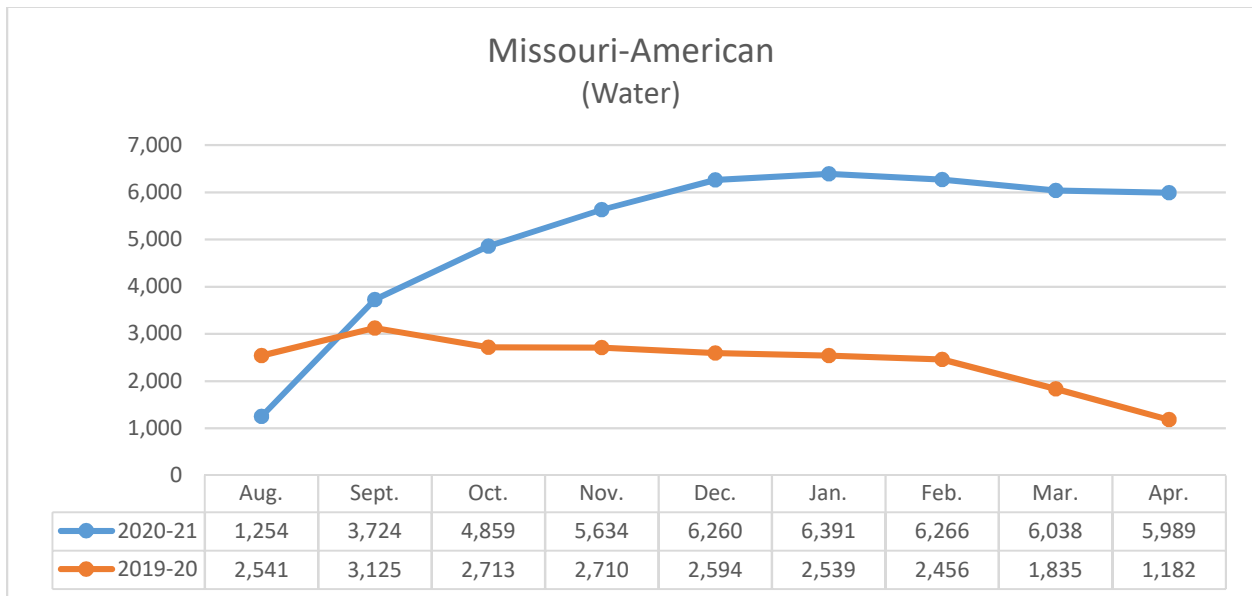
The previous data indicates that there were about 8% fewer Missouri-American customers with past-due accounts in April 2021 versus April 2020 and approximately 3% less in April 2021 than in March 2021. Missouri-American reported that it defines “past-due” as any unpaid amount past the due date on the 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 8,412 customers who were not disconnected in April 2021 versus none in April 2020 and approximately 34% fewer in April 2021 than in March 2021.

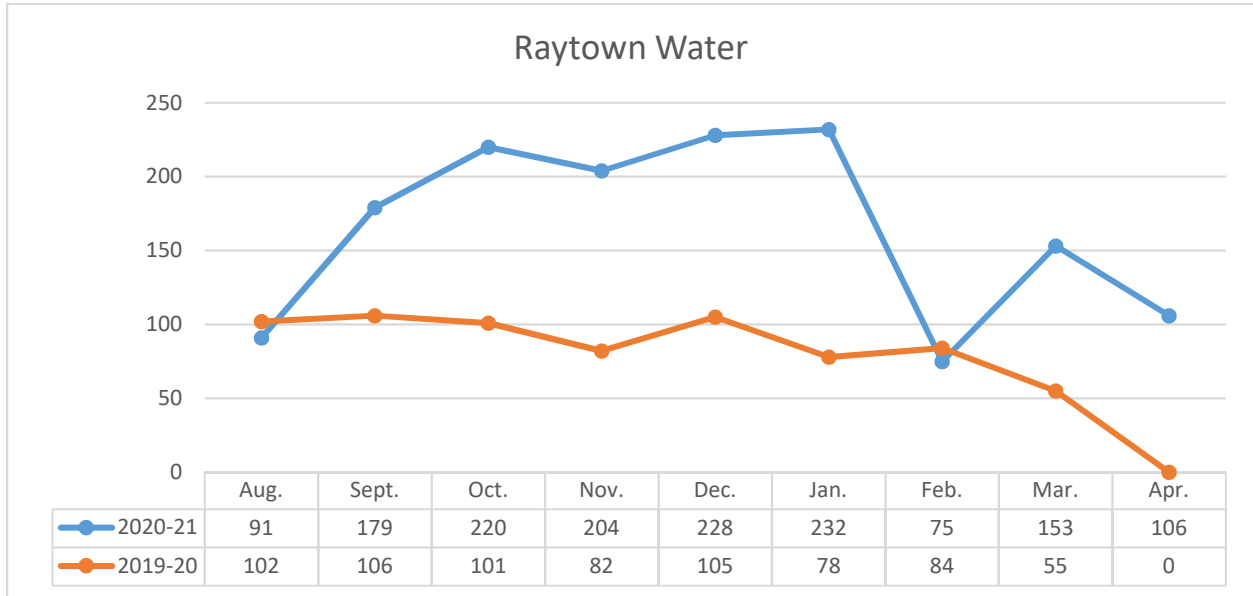
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 407% more Missouri-American customers who participated in payment plans in April 2021 versus April 2020 and about 1% fewer in April 2021 than in March 2021.

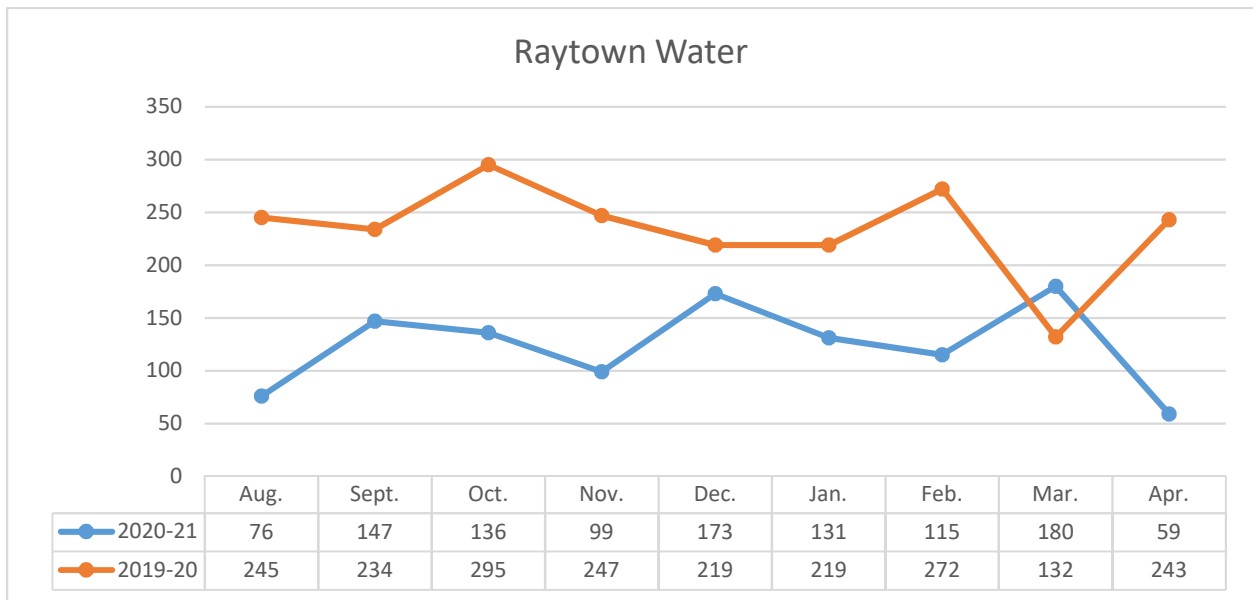
Questions 1 & 3 (Raytown Water)

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



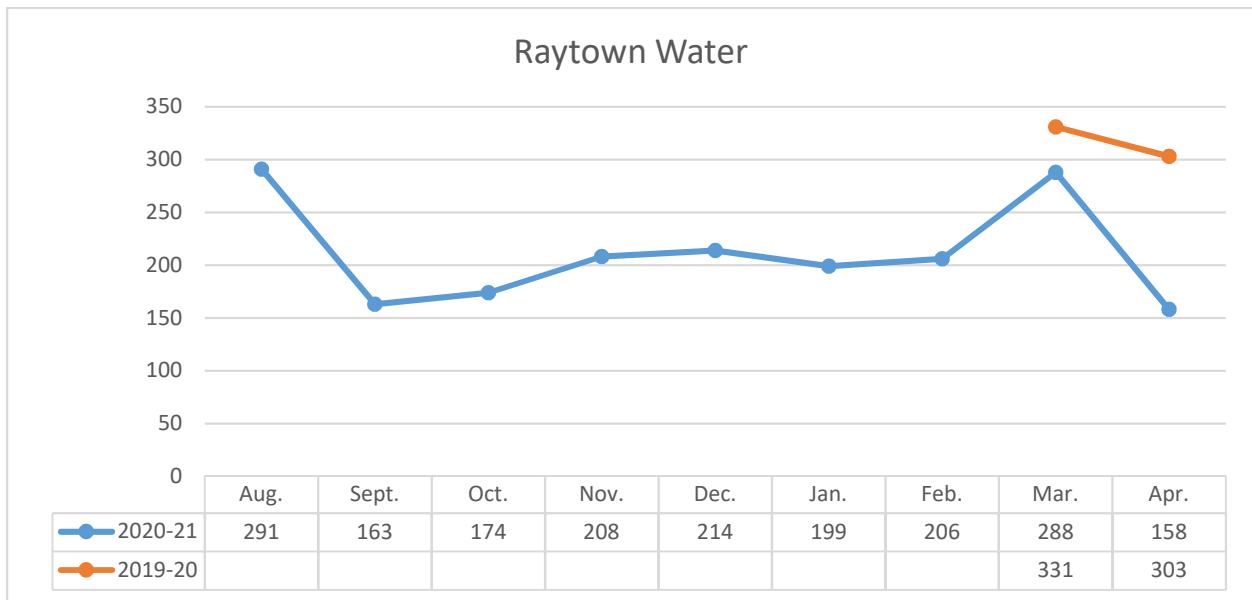
As shown in the previous graph, Raytown Water performed 106 disconnections for non-payment in April 2021 versus none in April 2020 and about 31% fewer in April 2021 than in March 2021. The number of actual disconnections by Raytown Water in April 2021 was approximately 14% below the number projected 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”



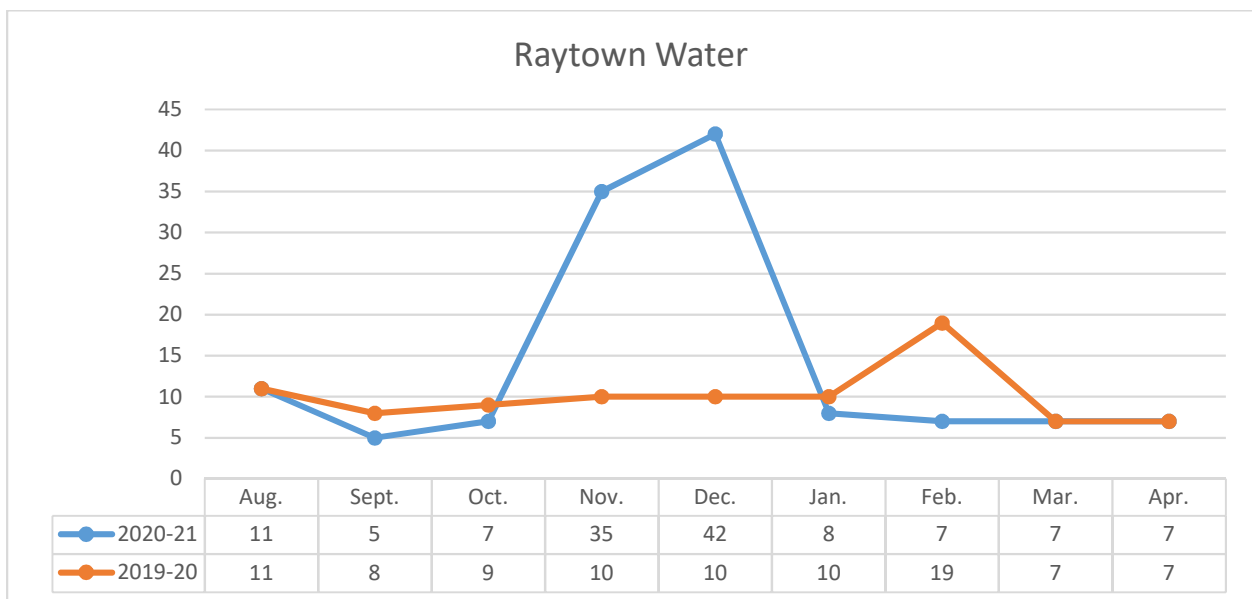
The previous data indicates that there were about 76% fewer Raytown Water customers with past-due accounts in April 2021 versus April 2020 and approximately 67% less in April 2021 than in March 2021. Raytown Water reported that it defines “past due” as accounts with balances that are over 31 days.

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 48% fewer customers who were not disconnected in April 2021 versus April 2020 and approximately 45% less in April 2021 than in March 2021.

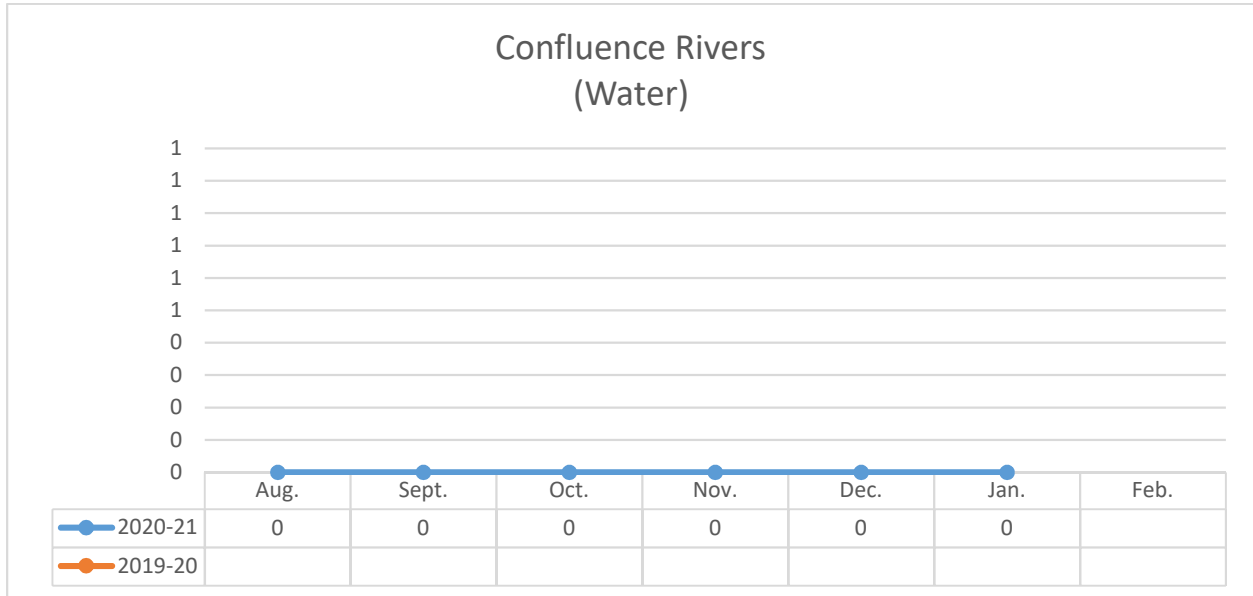
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were seven Raytown Water customers who participated in payment plans in April 2021, seven in April 2020, and seven in March 2020.

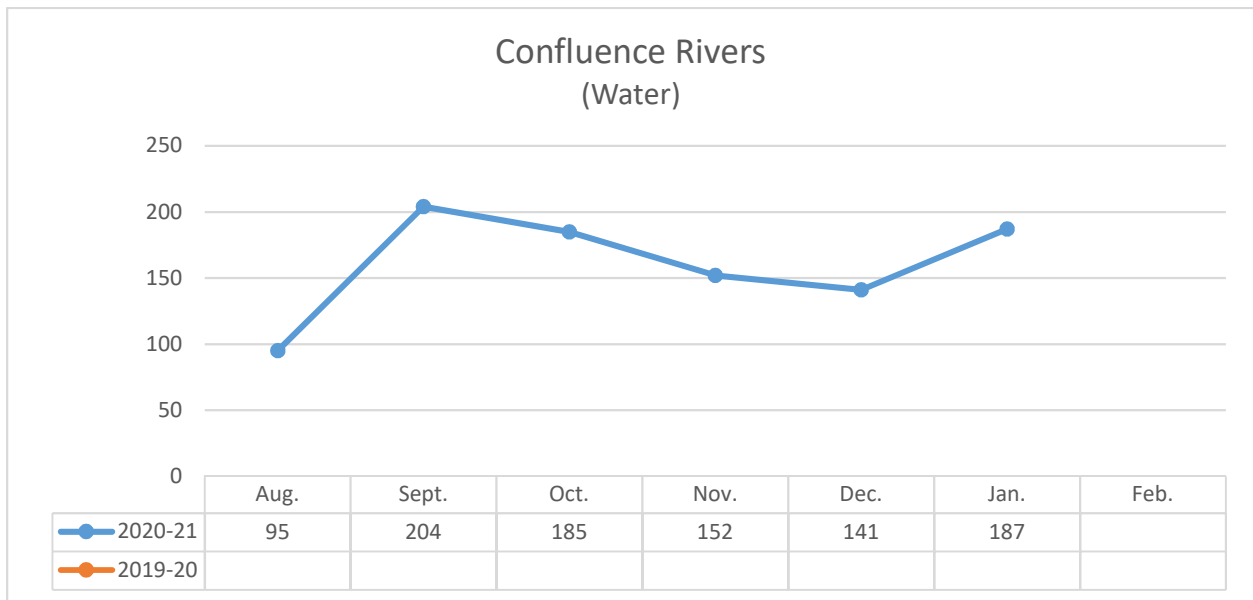
Questions 1 & 3 (Confluence Rivers - Water)

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



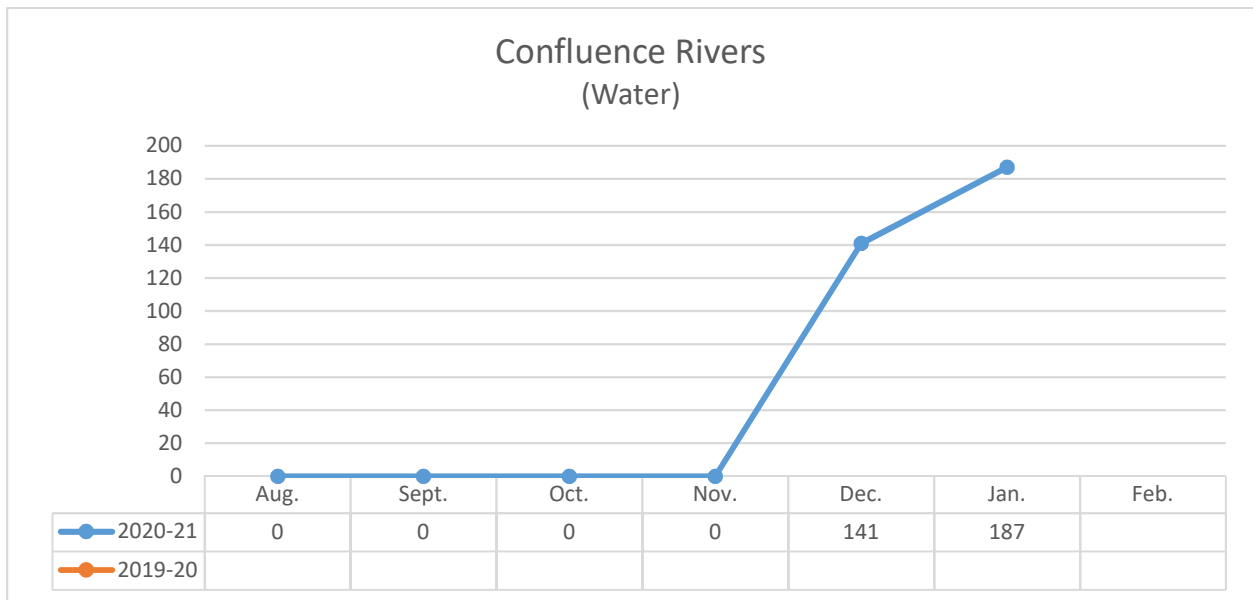
As shown in the previous graph, Confluence Rivers performed no disconnections in January 2021. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 24 disconnections was performed. Confluence Rivers does not forecast the number of disconnections for non-payment.

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”



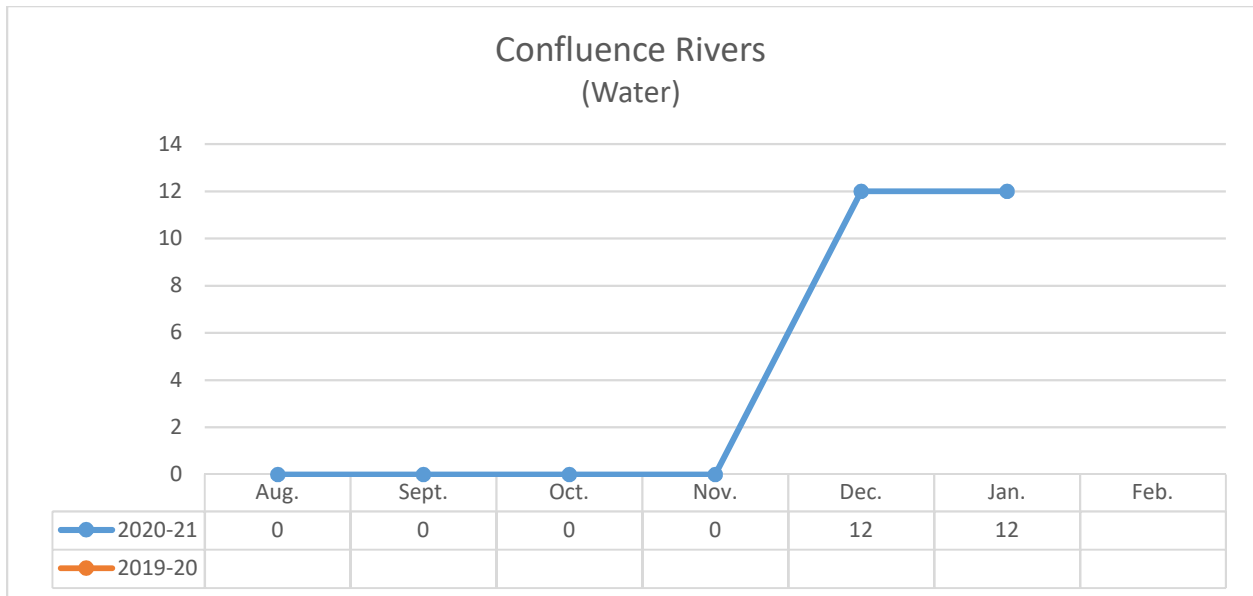
The previous data indicates there were about 33% more Confluence Rivers customers with past-due accounts in January 2021 versus December 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 37 customers with “past-due” accounts during this time period. Confluence Rivers reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid with a minimum threshold of \$25.00 due.

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



As shown by Confluence Rivers’ data, 187 customers received a final disconnection notice in January 2021 but were not disconnected for non-payment of service. 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. Confluence Rivers had approximately 33% more customers that received a final disconnection notice but were not disconnected for non-payment of service in January 2021 than in December 2020.

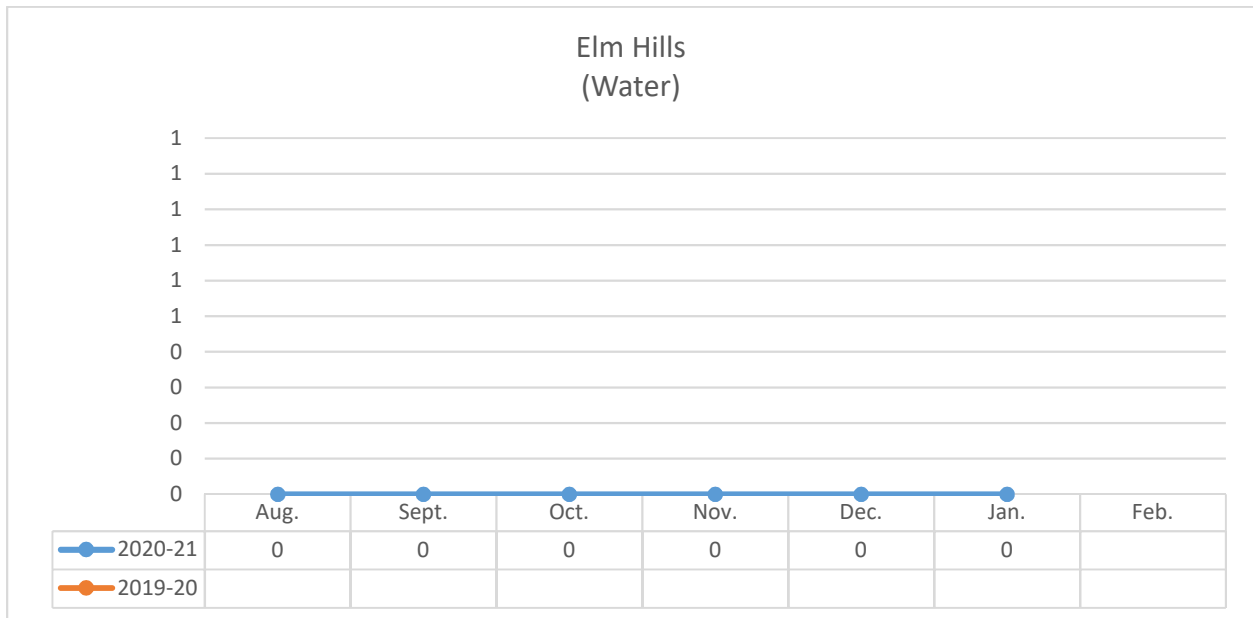
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were 12 Confluence Rivers customers who participated in payment plans in January 2021, which is the same number as in December 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.

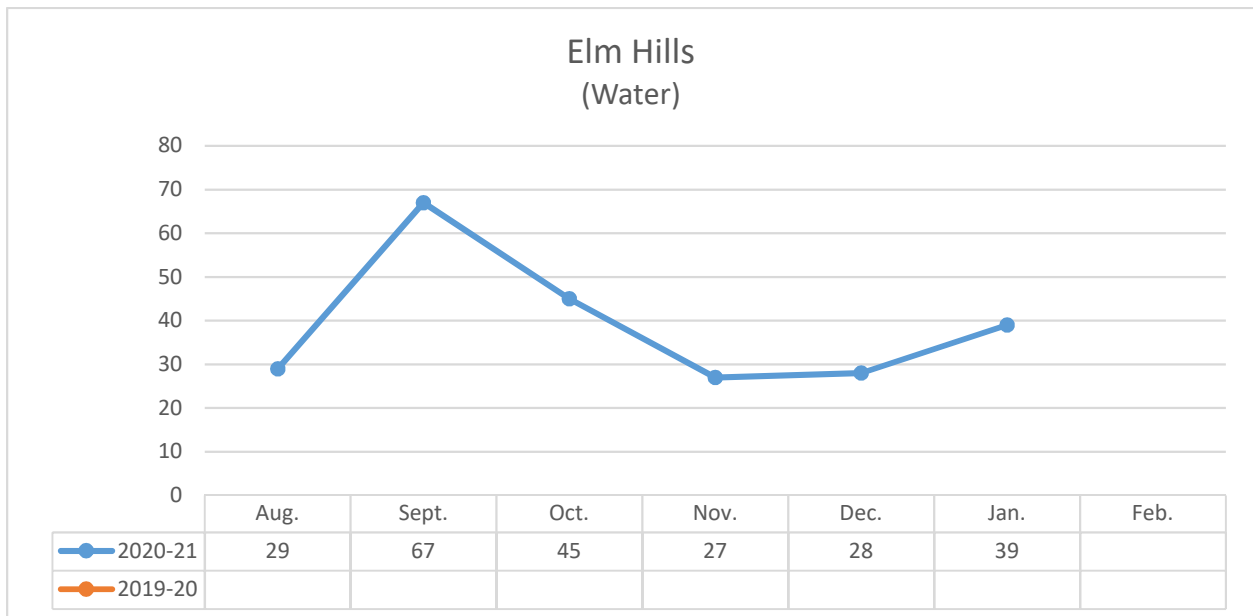
Questions 1 & 3 (Elm Hills - Water)

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



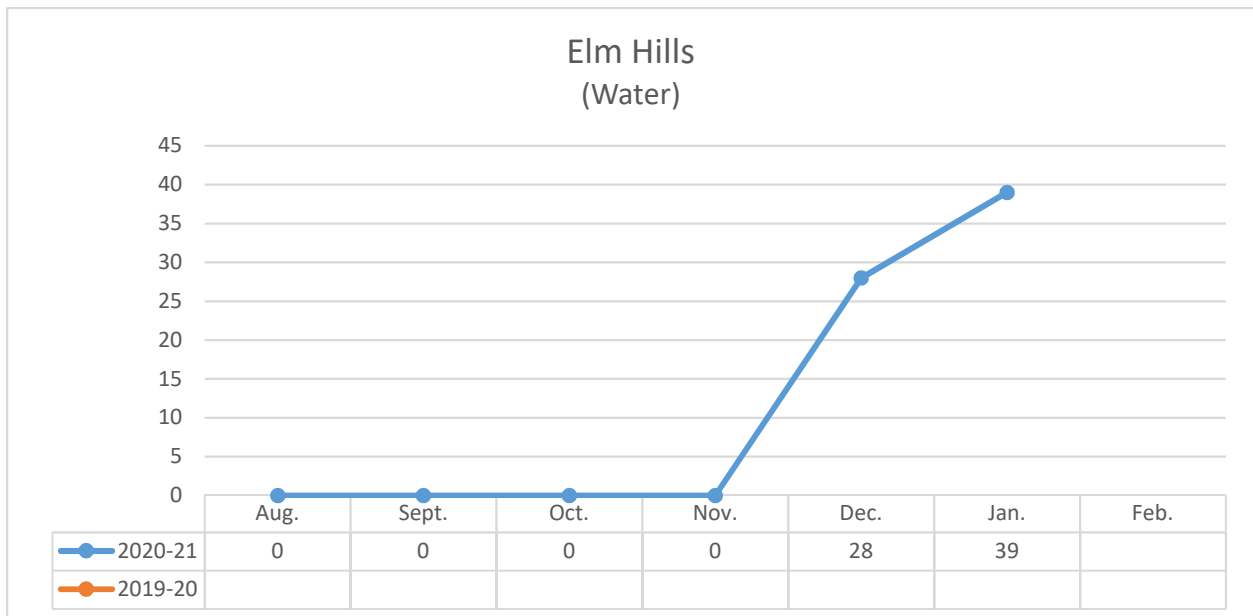
As shown in the previous graph, Elm Hills performed no disconnections in January 2021. No monthly, comparative data was provided for August 2019 to February 2020, although no disconnections were performed during this time period.

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”



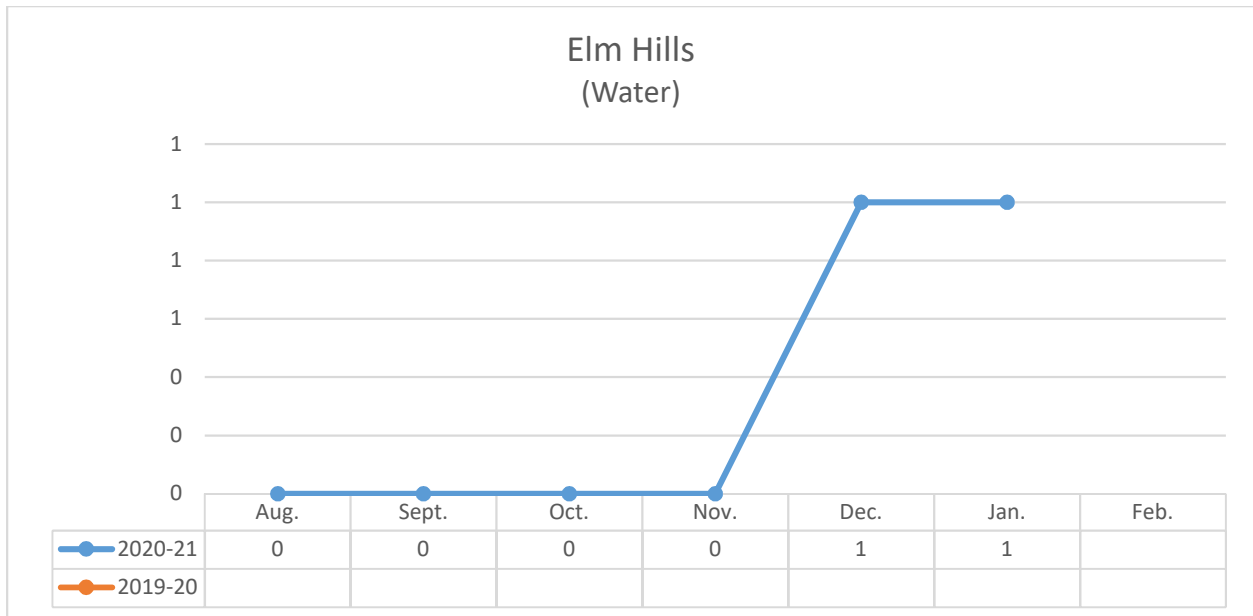
The previous data indicates there were about 39% more Elm Hills customers with past-due accounts in January 2021 versus December 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 1 customer with a “past-due” account during this time period. Elm Hills reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid with a minimum threshold of \$25.00 due.

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



As shown by Elm Hills’ data, 39 customers received a final disconnection notice in January 2021 but were not disconnected for non-payment of service. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 1 customer who received final disconnection notices but were not disconnected during this time period. Elm Hills had approximately 39% more customers that received a final disconnection notice but were not disconnected for non-payment of service in January 2021 than in December 2020.

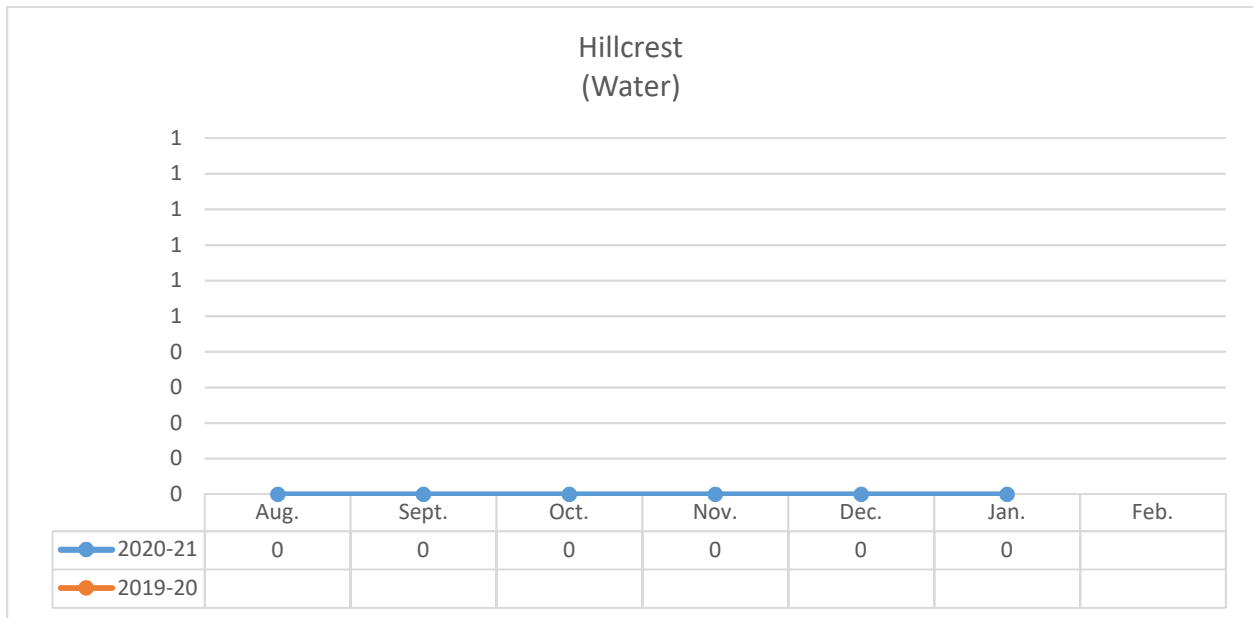
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there was one Elm Hills customer who participated in a payment plan in January 2021, which is the same number as in December 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.

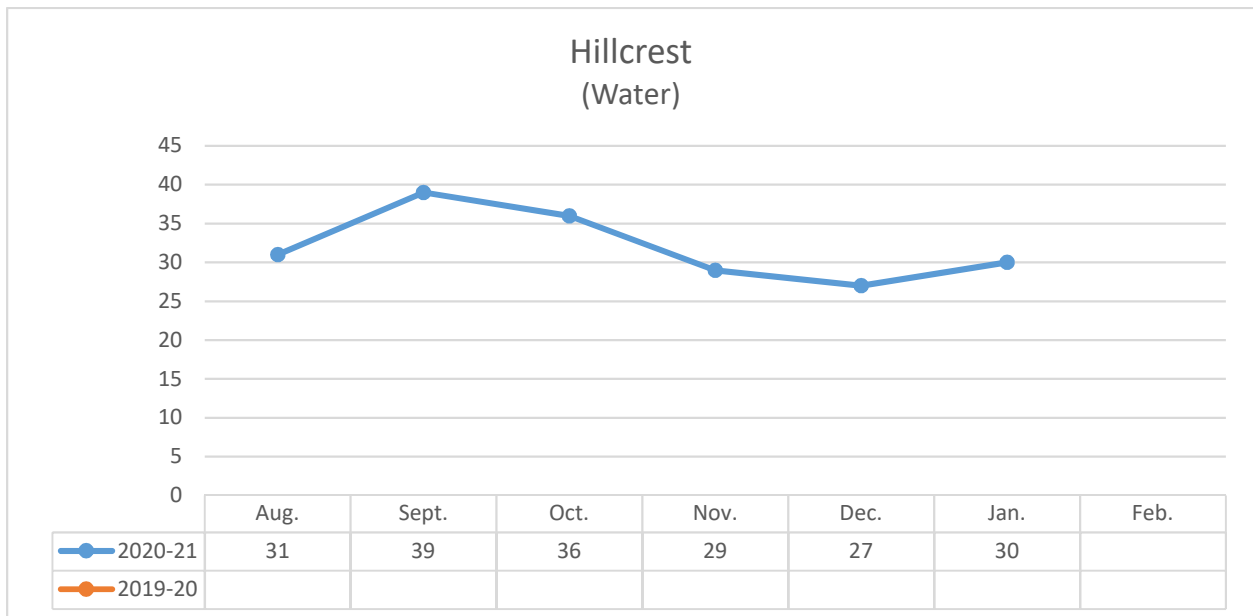
Questions 1 & 3 (Hillcrest - Water)

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



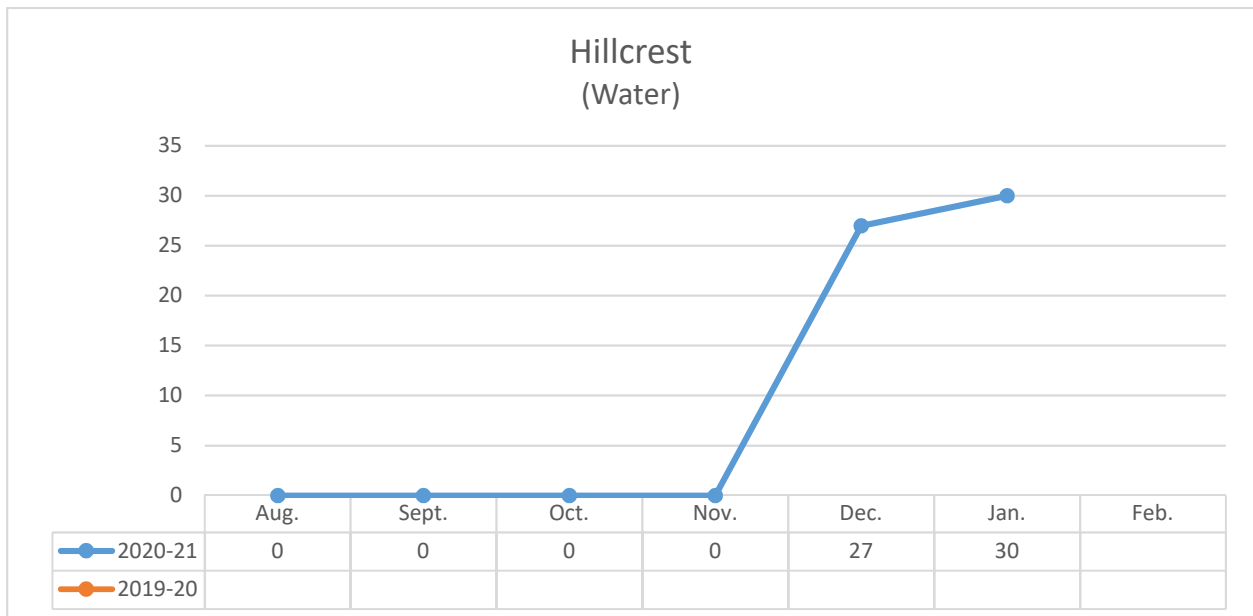
As shown in the previous graph, Hillcrest performed no disconnections in January 2021. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 12 disconnections was performed during this time period.

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”



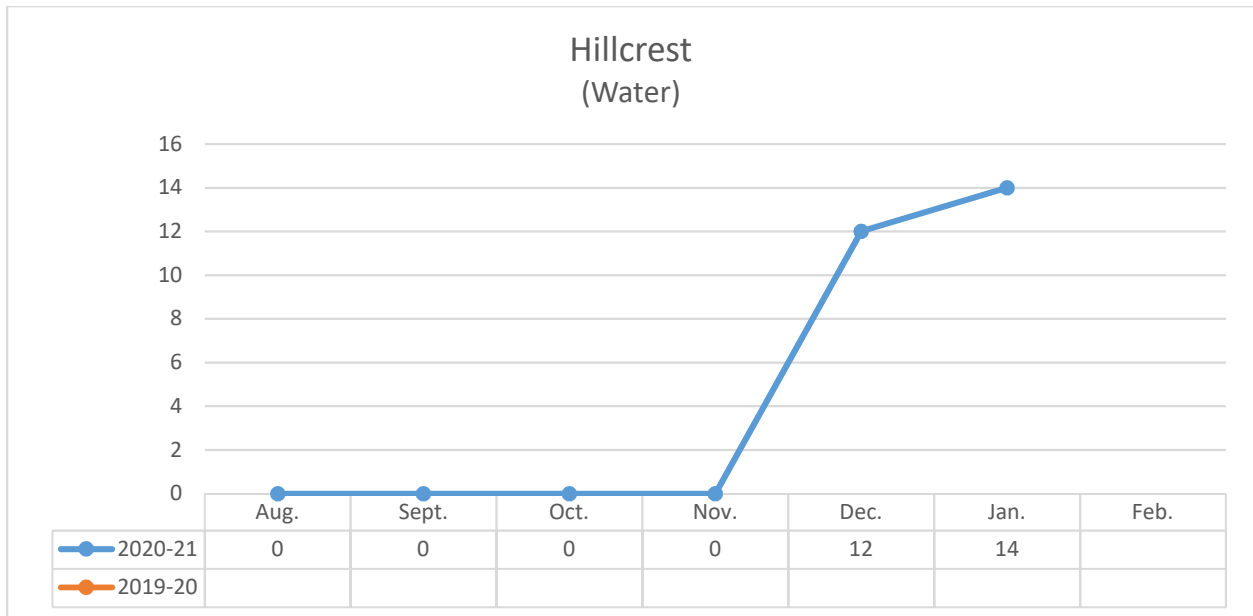
The previous data indicates there were about 11% more Hillcrest customers with past-due accounts in January 2021 versus December 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 16 customers with “past-due” accounts during this time period. Hillcrest reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid with a minimum threshold of \$25.00 due.

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



As shown by Hillcrest’s data, 30 customers received a final disconnection notice in January 2021. 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. Hillcrest had approximately 11% more customers that received a final disconnection notice but were not disconnected for non-payment of service in January 2021 than in December 2020.

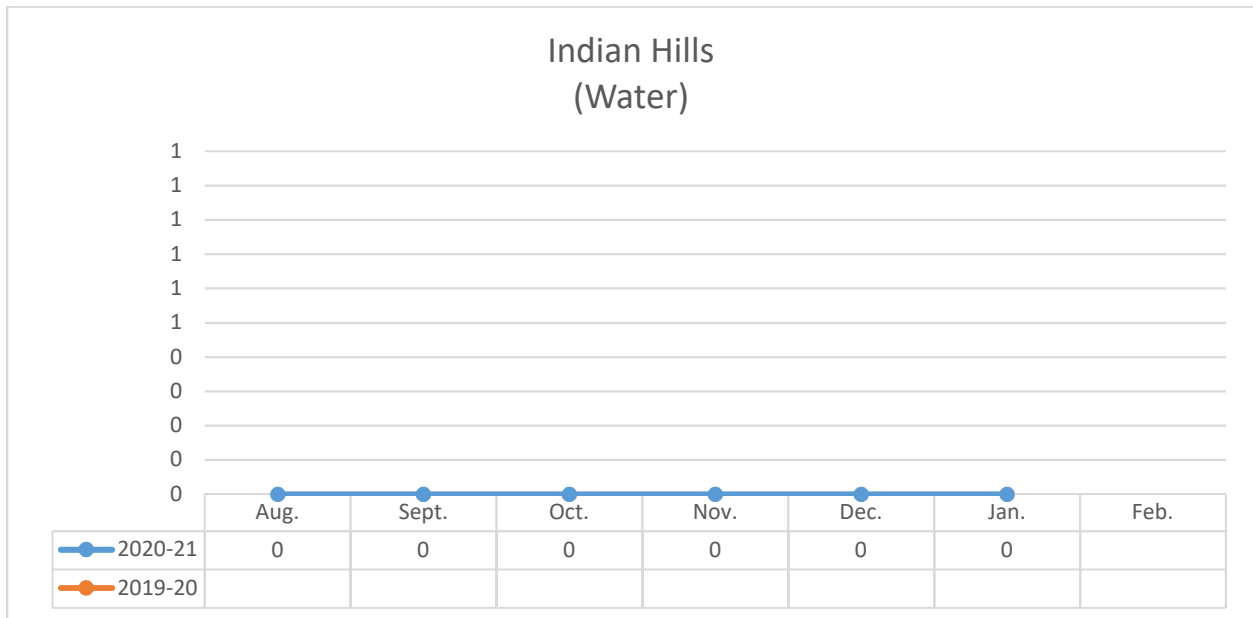
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were 14 Hillcrest customers who participated in payment plans in January 2021. 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. The previous graph illustrates that there were approximately 17% more Hillcrest customers who participated in payment plans in January 2021 than in December 2020.

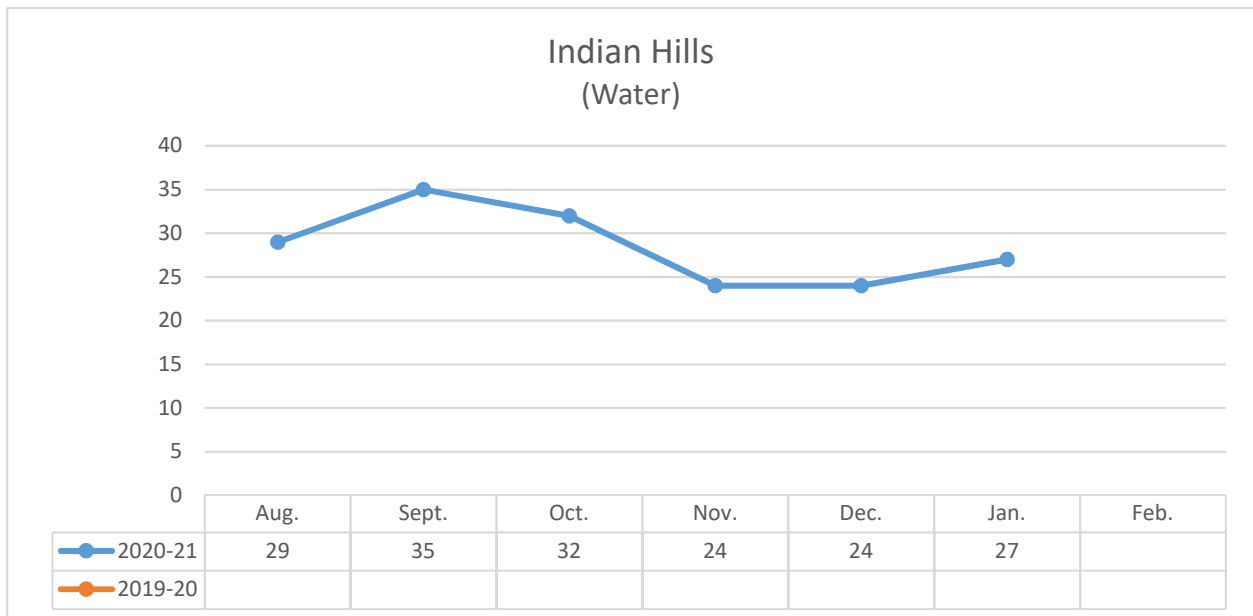
Questions 1 & 3 (Indian Hills - Water)

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



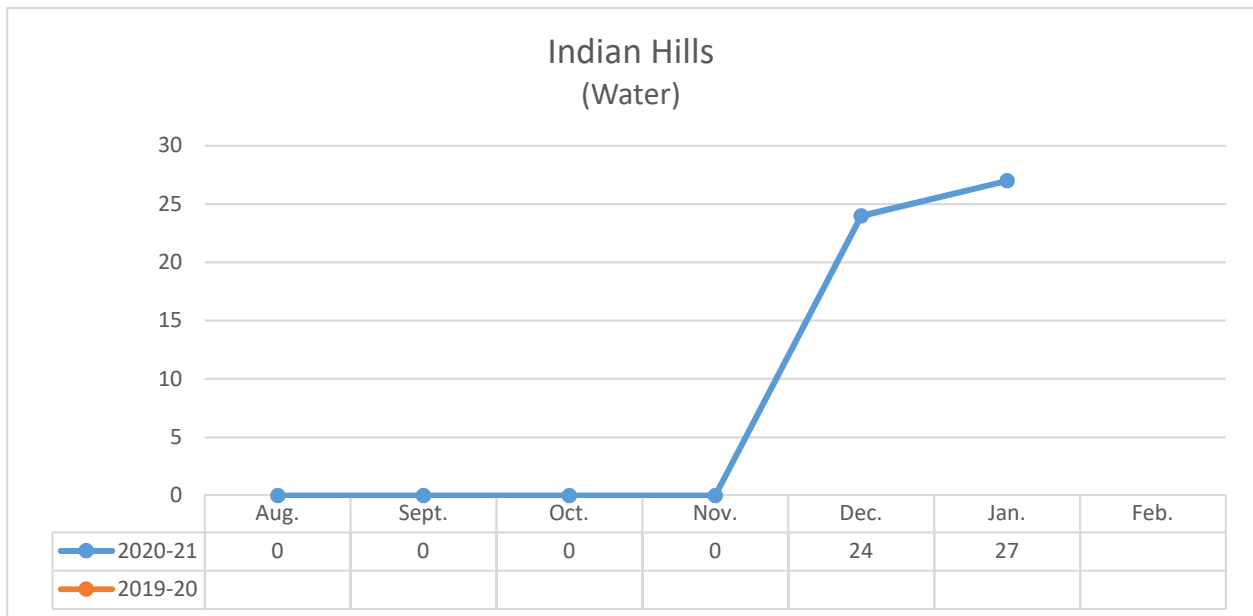
As shown in the previous graph, Indian Hills performed no disconnections in January 2021. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 6 disconnections was performed during this time period.

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”



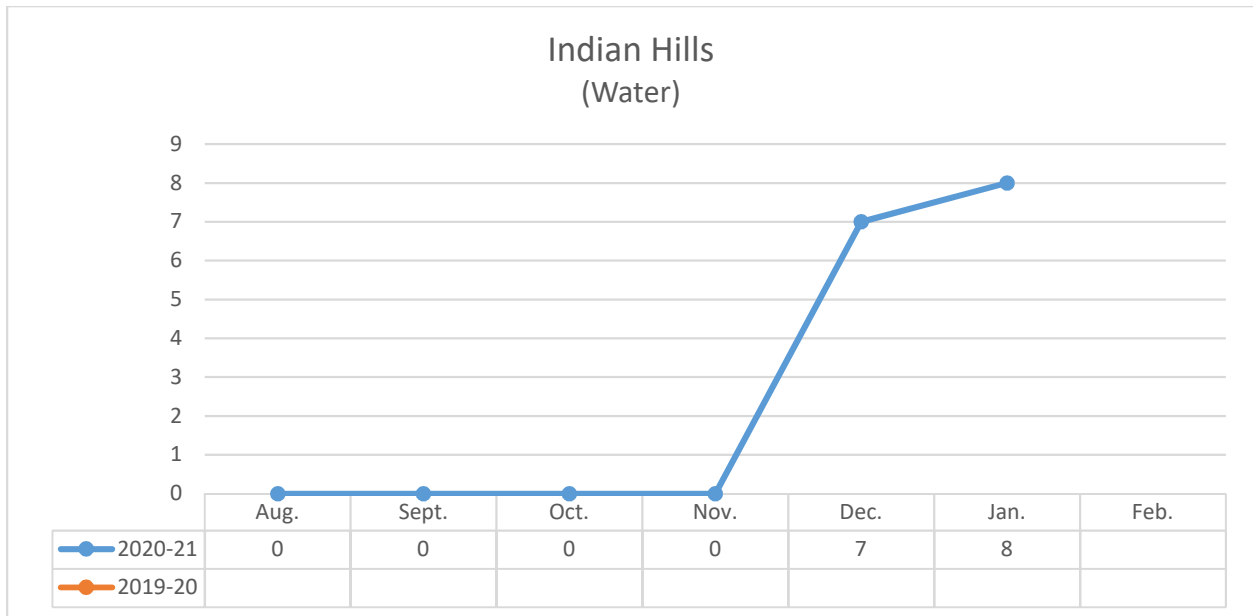
The previous data indicates there were about 13% more Indian Hills customers with past-due accounts in January 2021 versus December 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 11 customers with “past-due” accounts during this time period. Indian Hills reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid with a minimum threshold of \$25.00 due.

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



As shown by Indian Hills’ data, 27 customers received a final disconnection notice in January 2021. 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. Indian Hills had approximately 13% more customers that received a final disconnection notice but were not disconnected for non-payment of service in January 2021 than in December 2020.

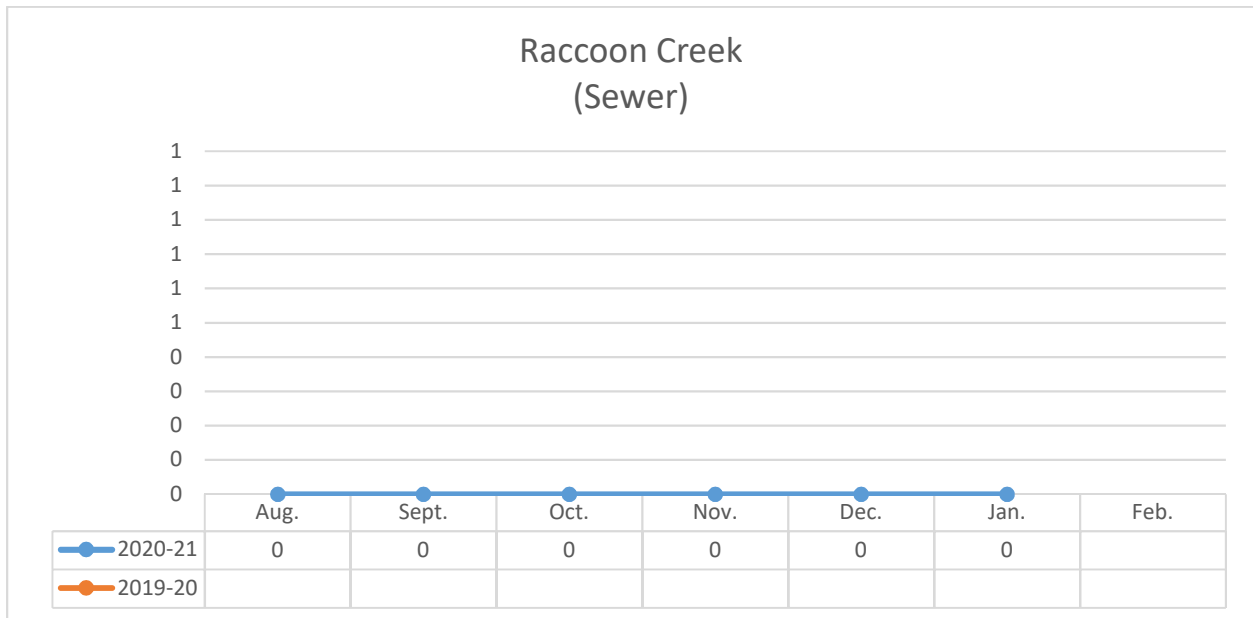
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were 8 Indian Hills customers who participated in payment plans in January 2021. 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. The previous graph illustrates that there were approximately 14% more Indian Hills customers who participated in payment plans in January 2021 than in December 2020.

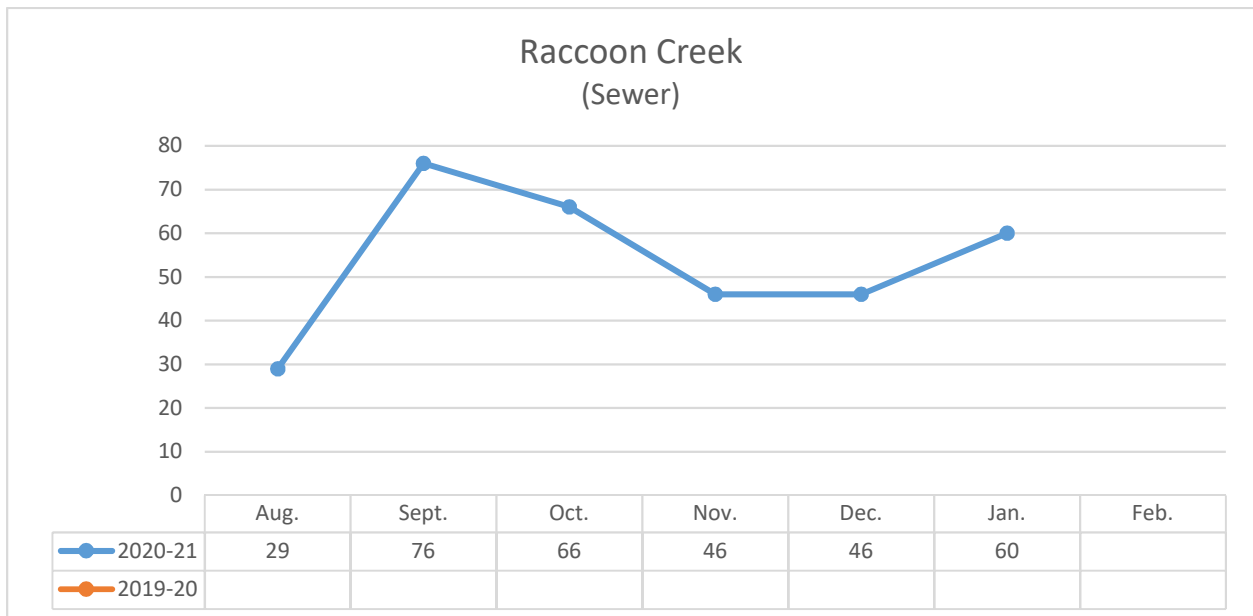
Questions 1 & 3 (Raccoon Creek - Sewer)

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



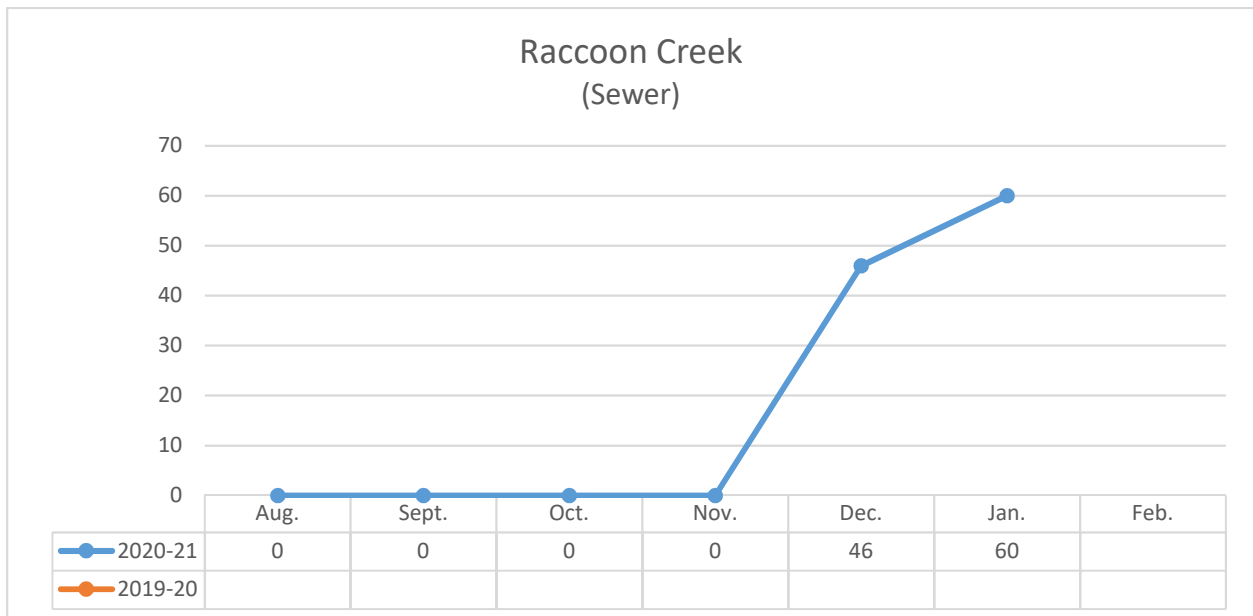
As shown in the previous graph, Raccoon Creek performed no disconnections in January 2021. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 1 disconnection was performed during this time period.

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”



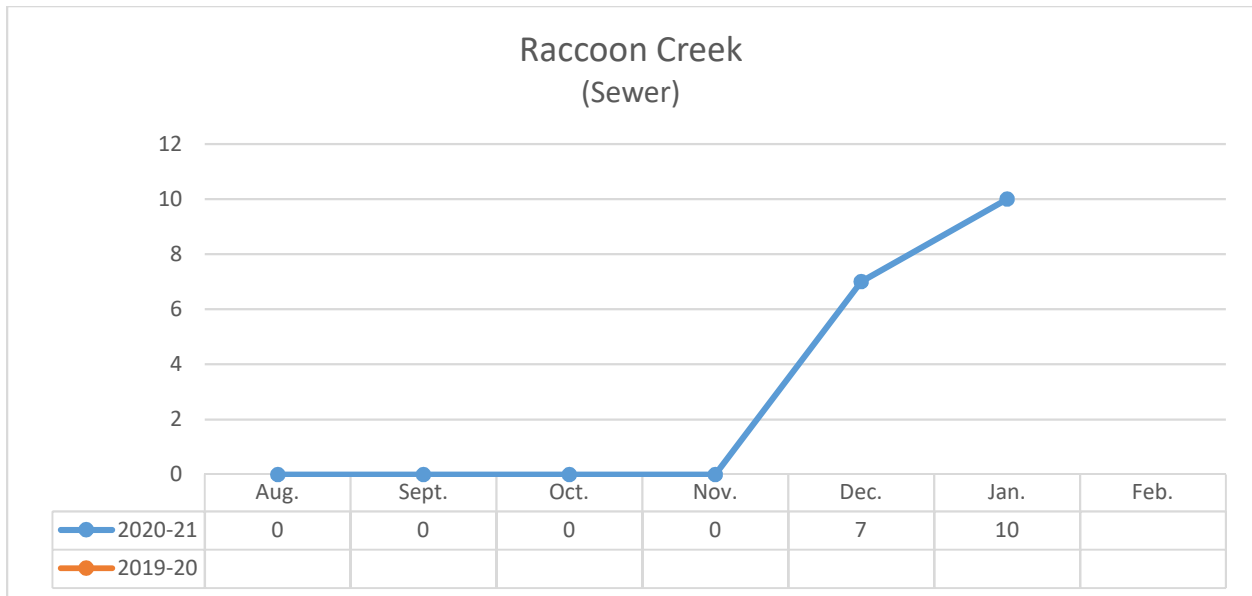
The previous data indicates there were about 30% more Raccoon Creek customers with past-due accounts in January 2021 versus December 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 3 customers with “past-due” accounts during this time period. Raccoon Creek reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid with a minimum threshold of \$25.00 due.

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



As shown by Raccoon Creek’s data, 60 customers received a final disconnection notice in January 2021. 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. Raccoon Creek had approximately 30% more customers that received a final disconnection notice but were not disconnected for non-payment of service in January 2021 than in December 2020.

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



The previous graph illustrates that there were 10 Raccoon Creek customers who participated in payment plans in January 2021. 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. The previous graph illustrates that there were approximately 43% more Raccoon Creek customers who participated in payment plans in January 2021 than in December 2020.

Question 2

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

Ameren Missouri (Electric)

3/2021	4/2021	5/2021	6/2021	7/2021	8/2021
-	-	80	70	70	80

Ameren Missouri (Electric) did not provide an explanation of the methodology for the current set of projections.

Empire (Electric)

3/2021	4/2021	5/2021	6/2021	7/2021	8/2021
540	1000	1600	1600	1600	1600

Empire (Electric) estimates are based on historical averages. It enlisted the help of its service centers which will help to work more disconnects, weather permitting. With the help of its service department, it is projecting a maximum of 1,600 disconnects per month.

Evergy Metro (Electric)

3/2021	4/2021	5/2021	6/2021	7/2021	8/2021
0	0	3300	3300	3300	3300

Evergy Metro responded that its estimates are based on recent and previous year data and resource capacity.

Evergy West (Electric)

3/2021	4/2021	5/2021	6/2021	7/2021	8/2021
0	0	2200	2200	2200	2200

Evergy West responded that its estimates are based on recent and previous year data and resource capacity.

Ameren Missouri (Gas)

3/2021	4/2021	5/2021	6/2021	7/2021	8/2021
-	-	5200	6000	5700	5500

Ameren Missouri (Gas) did not provide an explanation of the methodology for the current set of projections.

Spire (Gas)

3/2021	4/2021	5/2021	6/2021	7/2021	8/2021
1172	7015	9653	8990	7540	4978

Spire responded that its estimate includes a 3-year average for each month of historical disconnection for non-payments. The March 2021 number is the actual number of disconnections for that month.

Summit (Gas)

3/2021	4/2021	5/2021	6/2021	7/2021	8/2021
83	206	232	115	149	149

Summit did not provide an explanation of the methodology for the current set of projections.

Empire (Gas)

3/2021	4/2021	5/2021	6/2021	7/2021	8/2021
265	275	400	400	400	400

Empire (Gas) did not provide an explanation of the methodology for the current set of projections.

Liberty (MNG) (Gas)

3/2021	4/2021	5/2021	6/2021	7/2021	8/2021
750	750	750	500	250	250

Liberty MNG did not provide an explanation of the methodology for the current set of projections.

Liberty (Water)

3/2021	4/2021	5/2021	6/2021	7/2021	8/2021
40	60	60	60	60	60

Liberty did not provide an explanation of the methodology for the current set of projections.

Missouri-American (Water)

3/2021	4/2021	5/2021	6/2021	7/2021	8/2021
Do not forecast	-	-	-	-	-

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

Raytown Water (Water)

3/2021	4/2021	5/2021	6/2021	7/2021	8/2021
81	123	117	93	155	104

Raytown Water projections are based on an average of 2018-2019 data for the same month.

Confluence Rivers (Water)

3/2021	4/2021	5/2021	6/2021	7/2021	8/2021

As of the date of filing, Confluence Rivers has not provided updated data to project an estimated number of disconnections for non-payment of service for the six-month period of March 2021 through August 2021.

Elm Hills (Water)

3/2021	4/2021	5/2021	6/2021	7/2021	8/2021

As of the date of filing, Elm Hills has not provided updated data to project an estimated number of disconnections for non-payment of service for the six-month period of March 2021 through August 2021.

Hillcrest (Water)

3/2021	4/2021	5/2021	6/2021	7/2021	8/2021

As of the date of filing, Hillcrest has not provided updated data to project an estimated number of disconnections for non-payment of service for the six-month period of March 2021 through August 2021.

Indian Hills (Water)

3/2021	4/2021	5/2021	6/2021	7/2021	8/2021

As of the date of filing, Indian Hills has not provided updated data to project an estimated number of disconnections for non-payment of service for the six-month period of March 2021 through August 2021.

Raccoon Creek (Sewer)

3/2021	4/2021	5/2021	6/2021	7/2021	8/2021

As of the date of filing, Raccoon Creek has not provided updated data to project an estimated number of disconnections for non-payment of service for the six-month period of March 2021 through August 2021.