

**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) **File No. AW-2020-0356**
Payments After the Covid-19 Pandemic Emergency)

**STAFF REPORT ON UTILITY DATA REQUEST RESPONSES AND
NOTICE OF UPDATE TO STAFF DATA REQUESTS**

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, state utilities were asked to update these numbers on a monthly basis. In its *Order Extending Direction to Staff to Gather Information About Utility Disconnections* (“Order”), issued on December 2, 2020, the Commission ordered the state utilities to file updated responses to Staff’s DRs by the 15th of every month.

3. The majority of the state’s utilities provided updated responses to Staff’s DRs. However, the Central States Water Resources (“CSWR”) entities were unable to provide updated data in response to Staff’s DRs. Those entities 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.

4. CSWR explained to Staff on March 19, 2021 that the employee responsible was unable to compile the more detailed information requested in this docket due to an emergency.

NOTICE OF UPDATE TO STAFF DATA REQUESTS

5. When Staff originally issued its DRs in this docket, Staff requested that the utilities provide estimates of the number of disconnections for non-payment of service for the six-month period of September 2020 through February 2021.

6. Staff will be updating its DRs in this docket to request that utilities provide estimates of the number of disconnections for non-payment of service for the six-month period of March through October 2021, starting with next month's report.

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

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 this 22nd day of March, 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

MARCH 22, 2021

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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 sixth such update, incorporating information through the end of February 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.

For purposes of this updated report, the following utilities responded to this Staff data request with month-end February 2021 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"), and The Raytown Water Company ("Raytown Water").

The following utilities did not respond to the Staff data request with month-end February 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 February 2020 (orange dots and line), and for the period of August 2020 through February 2021 (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 February 2021 compared to January 2020).

At this time, it is apparent that the pandemic will continue to affect the levels of utility bad debts and customer disconnections in the coming months. Therefore, starting with the April 2021 report, Staff will be updating its data requests in this docket. For future filings, Staff will be requesting utilities provide (1) estimates of the number of disconnections for non-payment of service for the six-month period of March through October 2021, and (2) monthly information from March through July 2020 for comparison purposes.

Summary of Responses to Questions 1 and 3

Regarding Question 1a and 3a, more individual utilities reported decreases in the number of customer disconnections in February 2021 compared to the amount from February 2020, but more reported increases in the number of disconnections for February 2021 compared to the previous month, January 2021. Some utilities continued to maintain a moratorium on disconnections through all of or a part of February 2021, while others appeared to end their moratoriums during this period or otherwise accelerate the pace of customer disconnections.

For Question 1b and 3b, there were more utilities reporting increases than decreases in the number of past-due customer accounts in February 2021 compared to the amount from February 2020 and also compared to the amount in January 2021.

For Question 1c and 3c, in February 2021, most utilities reported increases in the number of customers who have received final disconnection notices, but have not yet been disconnected, compared to February 2020. There were also more increases than decreases for this metric for February 2021 compared to the previous month.

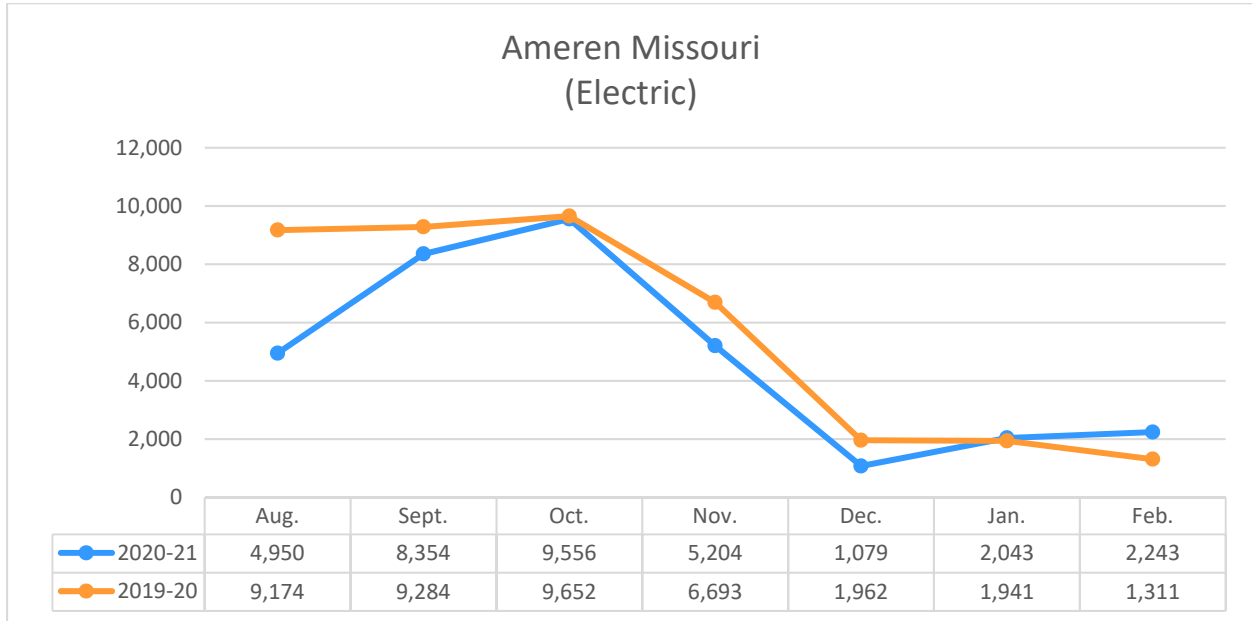
Regarding Question 1d and 3d, more utilities reported increases than decreases in the number of customers participating in payment plans in February 2021 compared to February 2020, with some of the increases being quite large. There were approximately the same number of utilities reporting increases and decreases in the number of customers participating in payment plans in February 2021 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.

Individual Utility Responses:

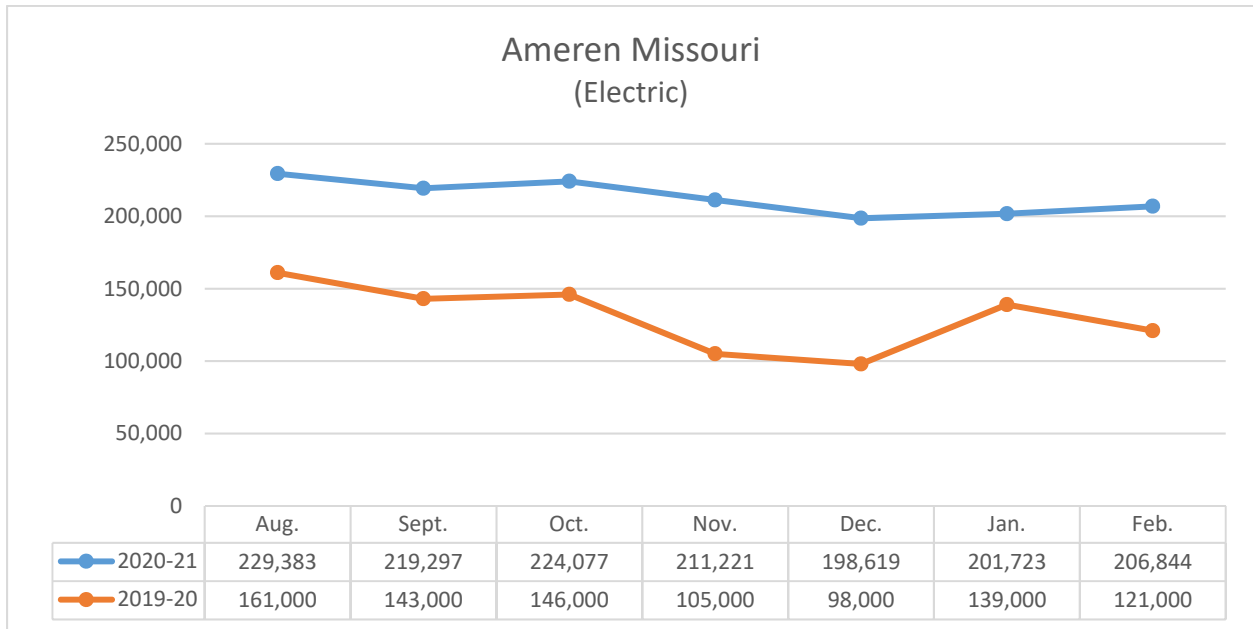
Questions 1 & 3 (Ameren Missouri – Electric)

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



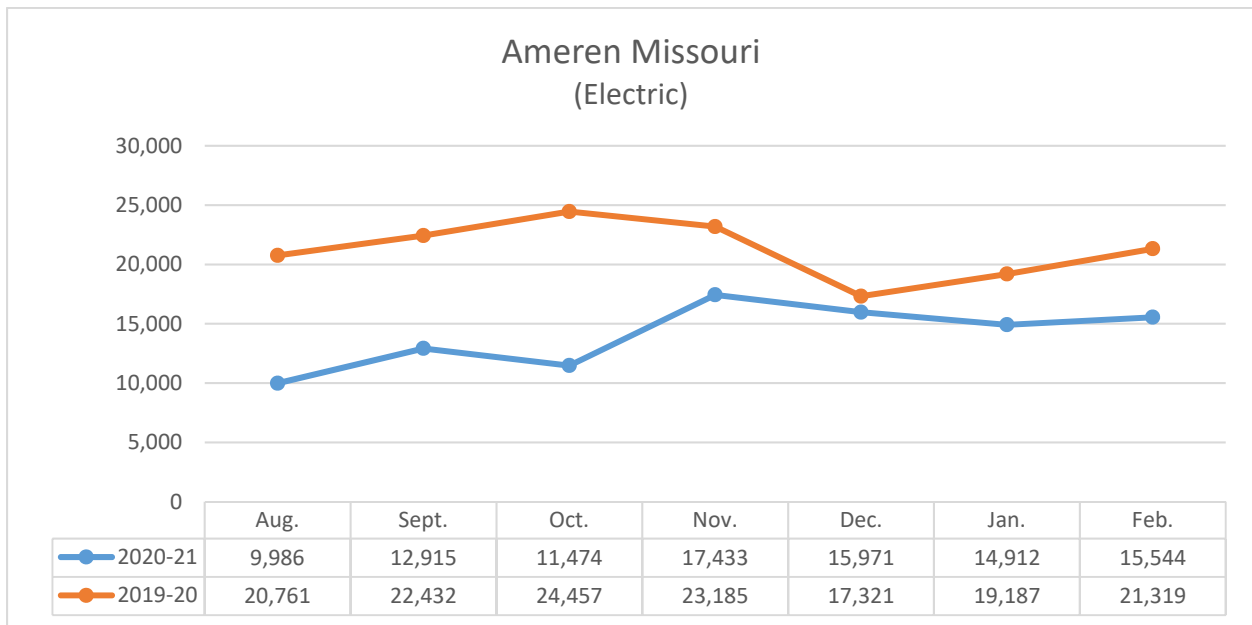
As shown in the previous graph, Ameren Missouri performed approximately 71% more disconnections for non-payment in February 2021 versus February 2020 and about 10% more in February 2021 than in January 2021. The number of actual disconnections by Ameren Missouri in February 2021 was approximately 69% 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”



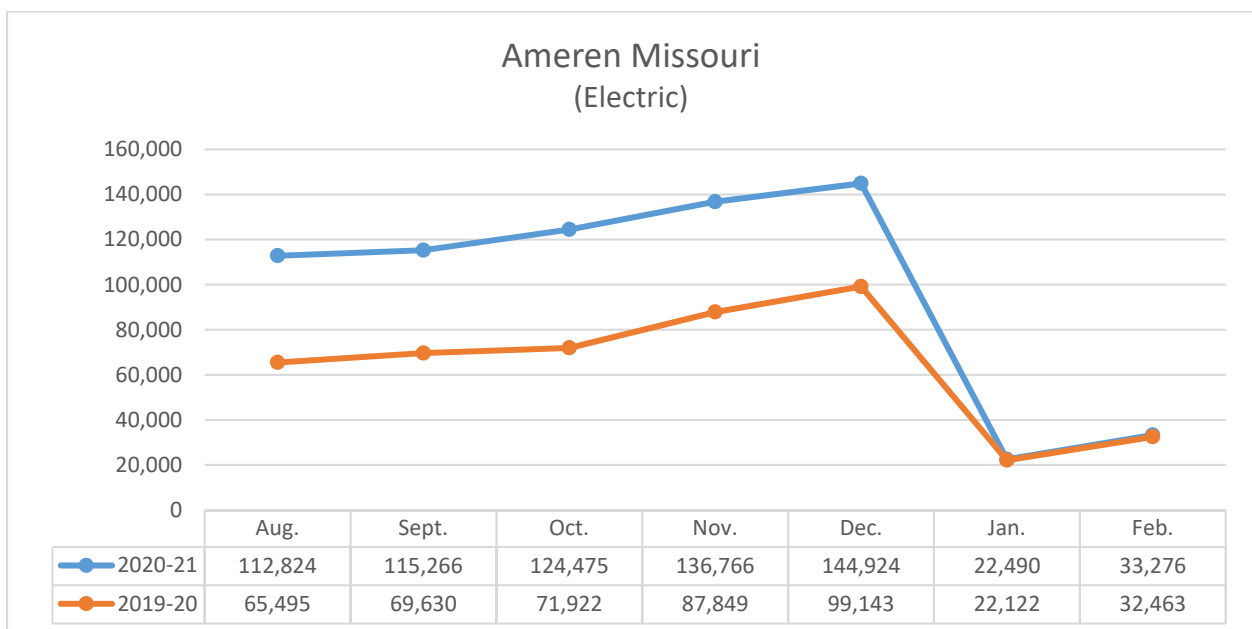
The previous data indicates that there were about 71% more Ameren Missouri customers with past-due accounts in February 2021 versus February 2020 and approximately 3% more in February 2021 than in January 2021. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

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 about 27% fewer customers who were not disconnected in February 2021 versus February 2020 and approximately 4% more in February 2021 than in January 2021.

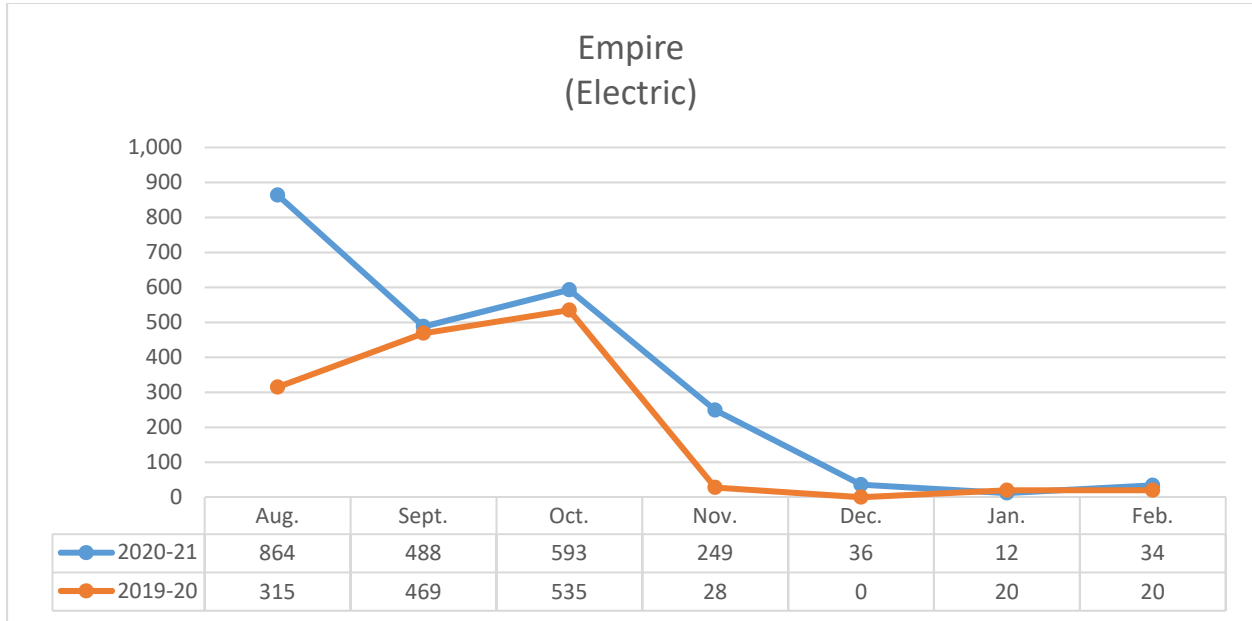
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 3% more Ameren Missouri customers who participated in payment plans in February 2021 versus February 2020 and about 48% more in February 2021 than in January 2021.

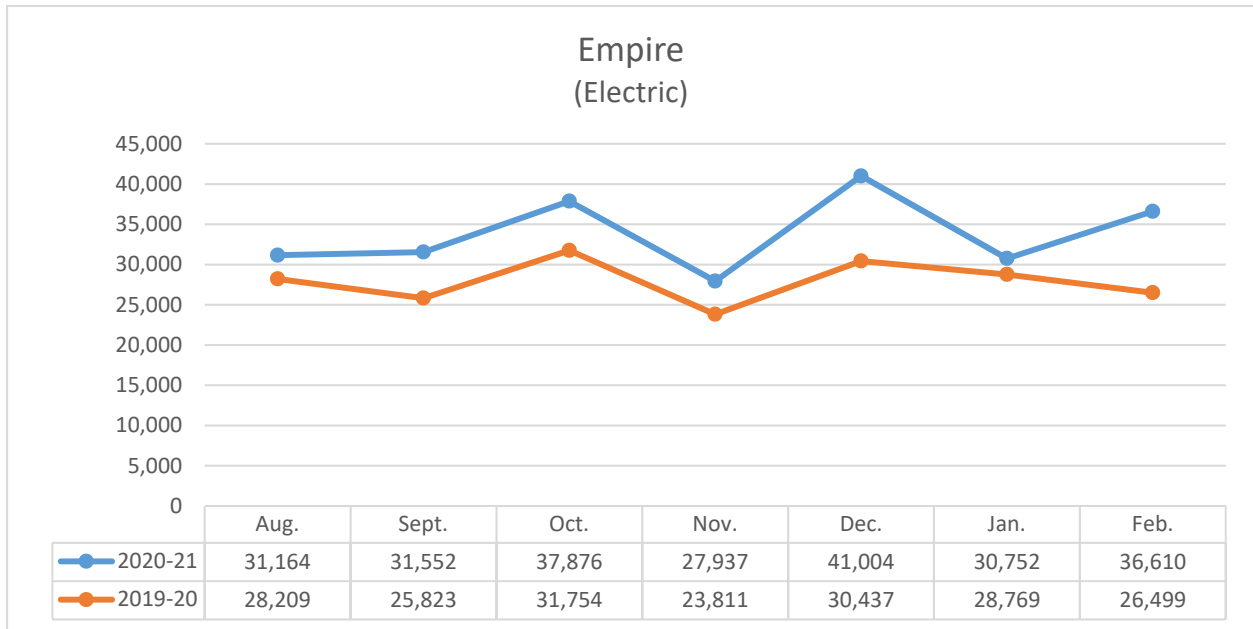
Questions 1 & 3 (Empire – Electric)

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



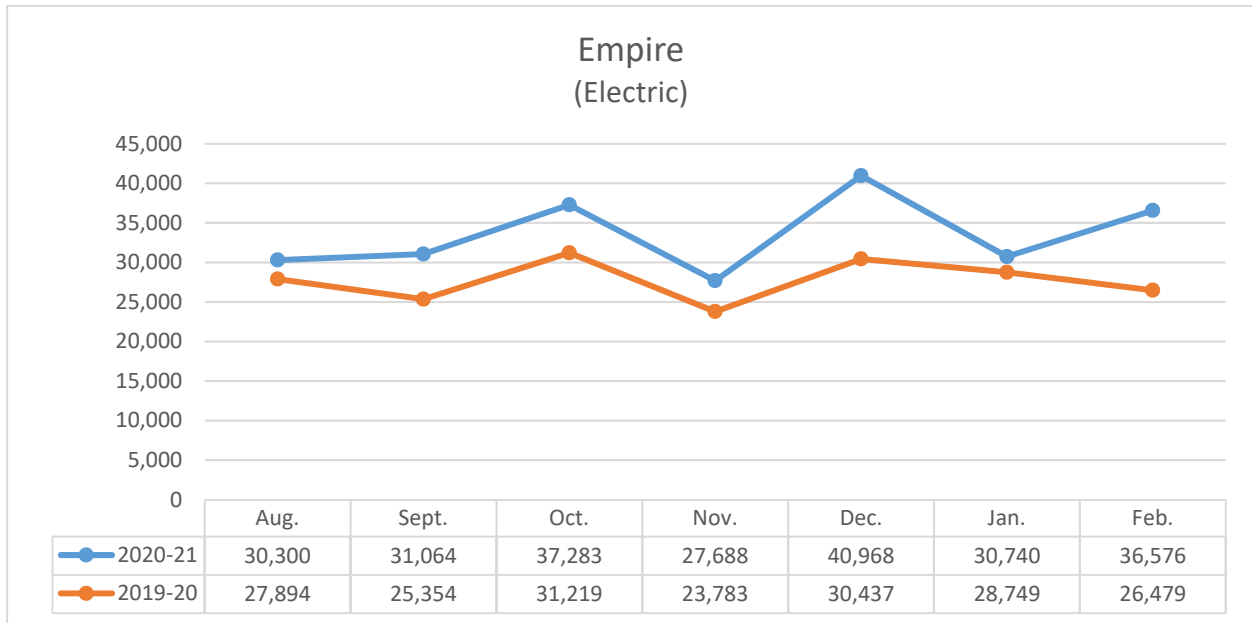
As shown in the previous graph, Empire performed approximately 70% more disconnections for non-payment in February 2021 versus February 2020 and about 183% more in February 2021 than in January 2021. The number of actual disconnections by Empire in February 2021 was approximately 32% below the number 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”



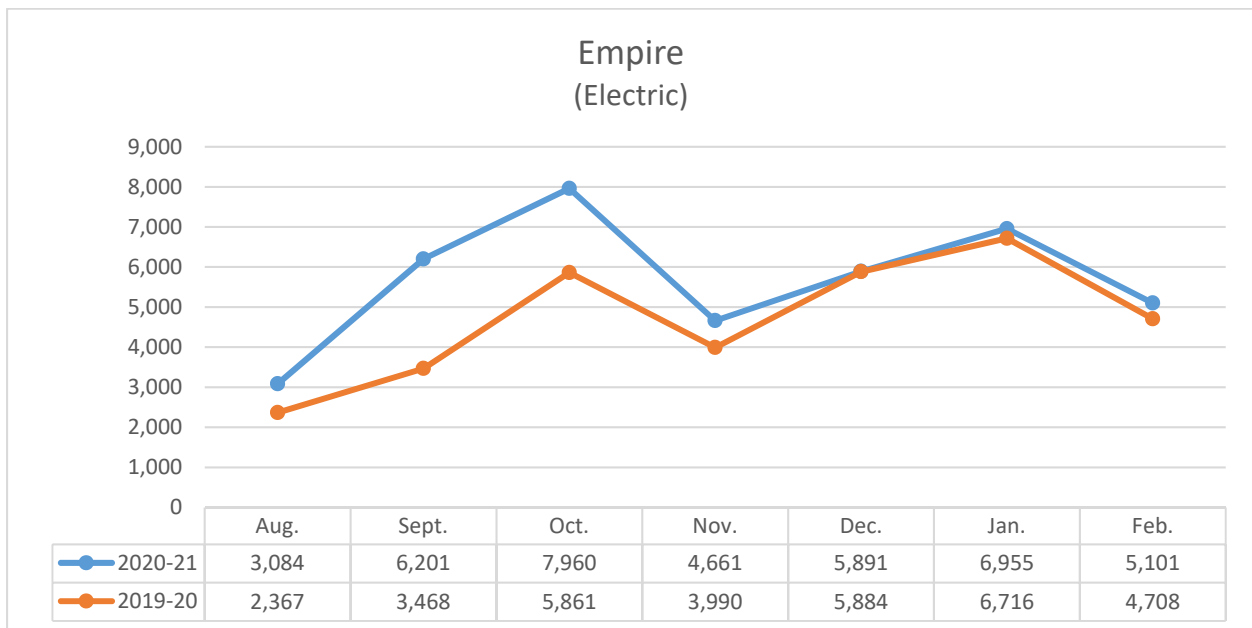
The previous data indicates that there were about 38% more Empire customers with past-due accounts in February 2021 versus February 2020 and approximately 19% more in February 2021 than in January 2021. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the 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 38% more customers who were not disconnected in February 2021 versus February 2020 and approximately 19% more in February 2021 than in January 2021.

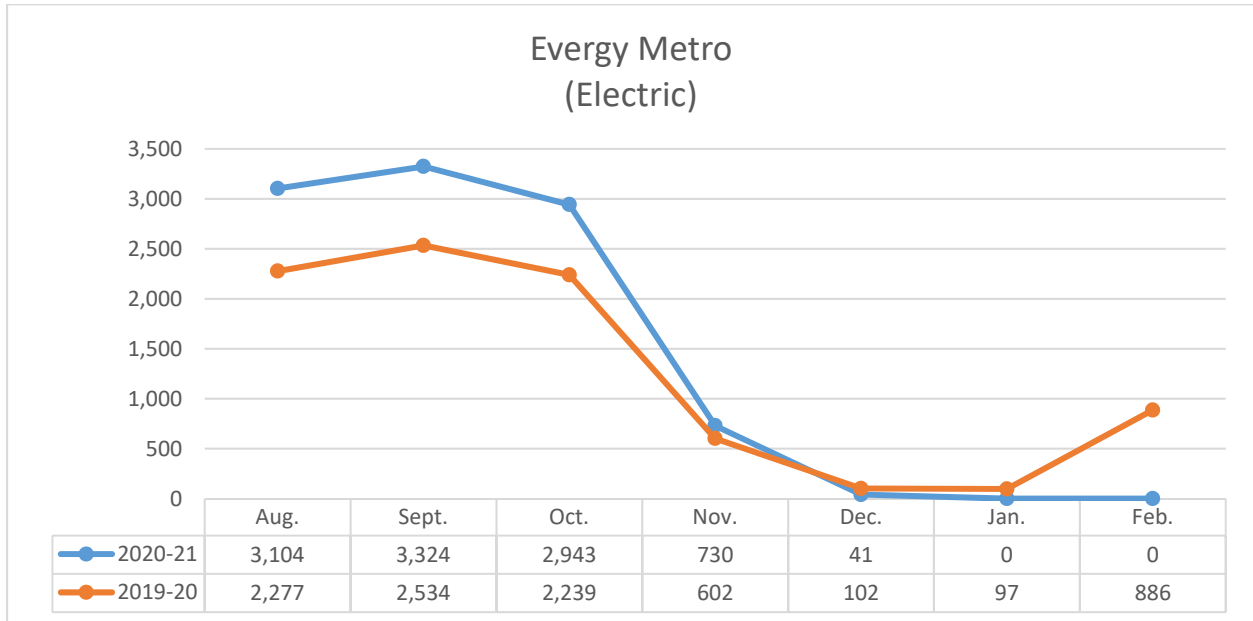
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 8% more Empire customers who participated in payment plans in February 2021 versus February 2020 and about 27% fewer in February 2021 than in January 2021.

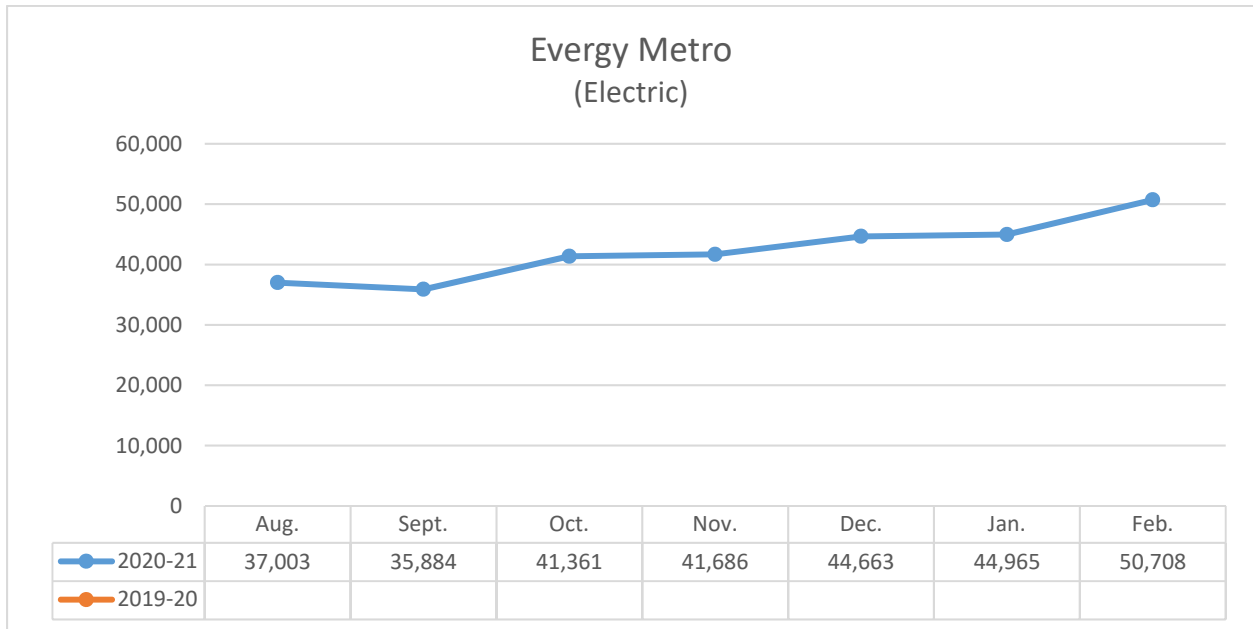
Questions 1 & 3 (Evergy Metro – Electric)

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



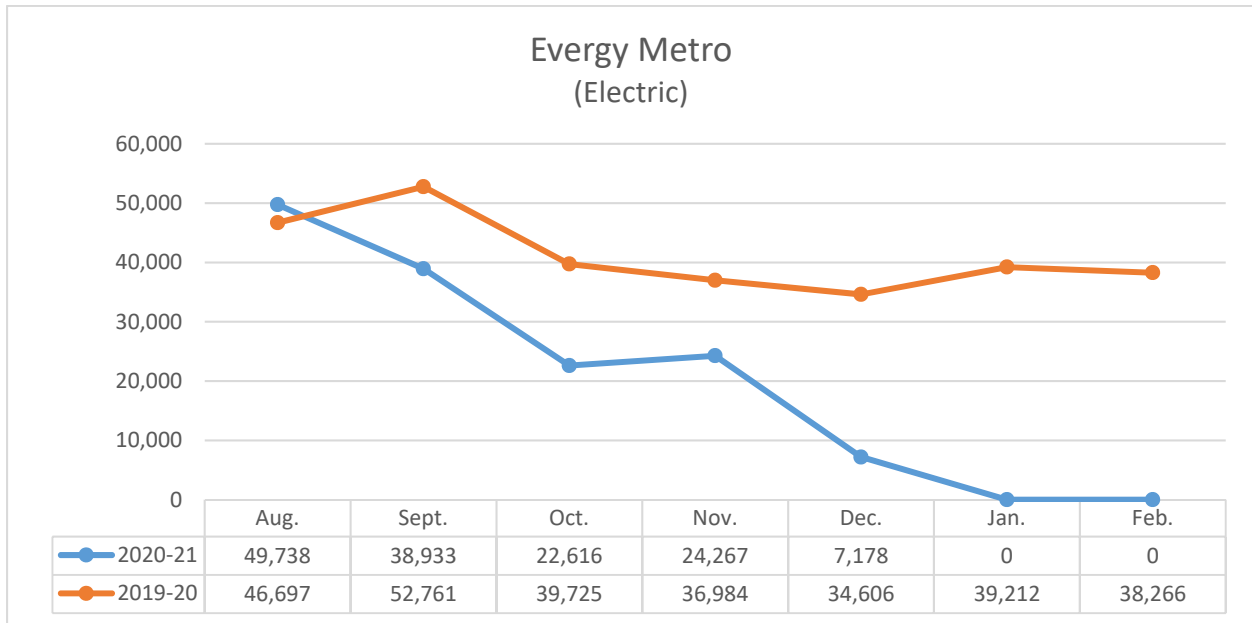
As shown in the previous graph, Evergy Metro performed no disconnections for non-payment in February 2021 versus 886 in February 2020 and none in January 2021. The number of actual disconnections by Evergy Metro in February 2021 was the same as the number projected by Evergy Metro for the same month.

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”



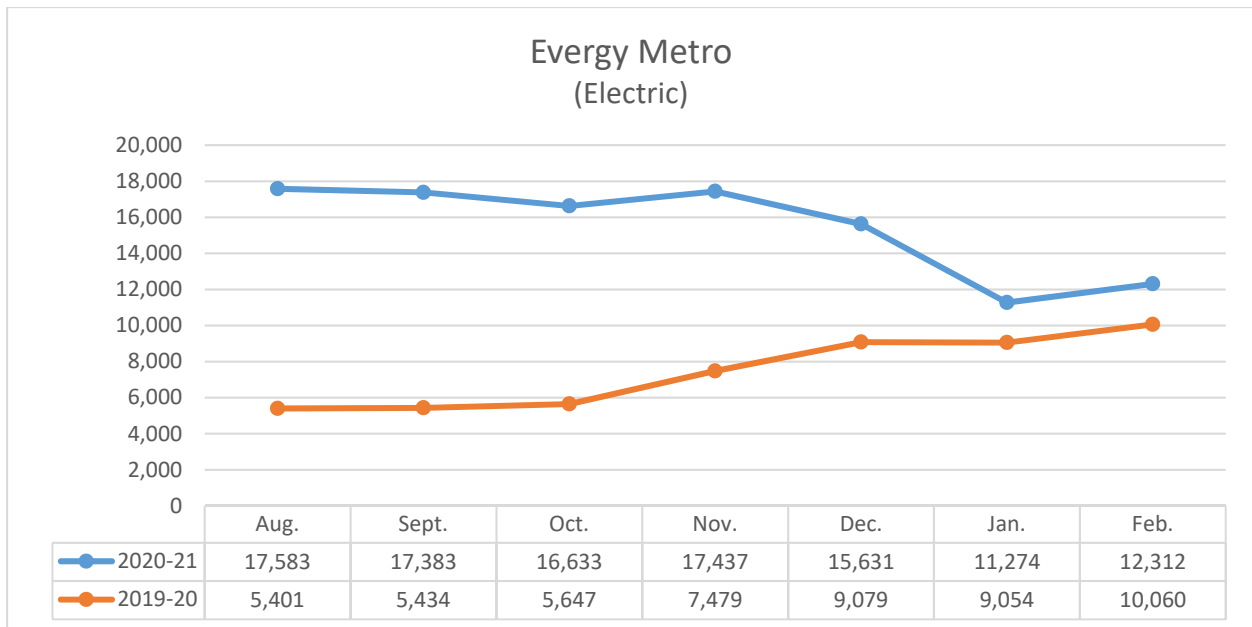
The previous data indicates that there were about 13% more Evergy Metro customers with past-due accounts in February 2021 versus January 2021. Evergy Metro indicated it is unable to provide comparable past-due data for August 2019 to February 2020. Evergy Metro defines past-due accounts as accounts that 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, no customers received a final disconnection notice in February 2021 versus 38,266 in February 2020 and none in January 2021.

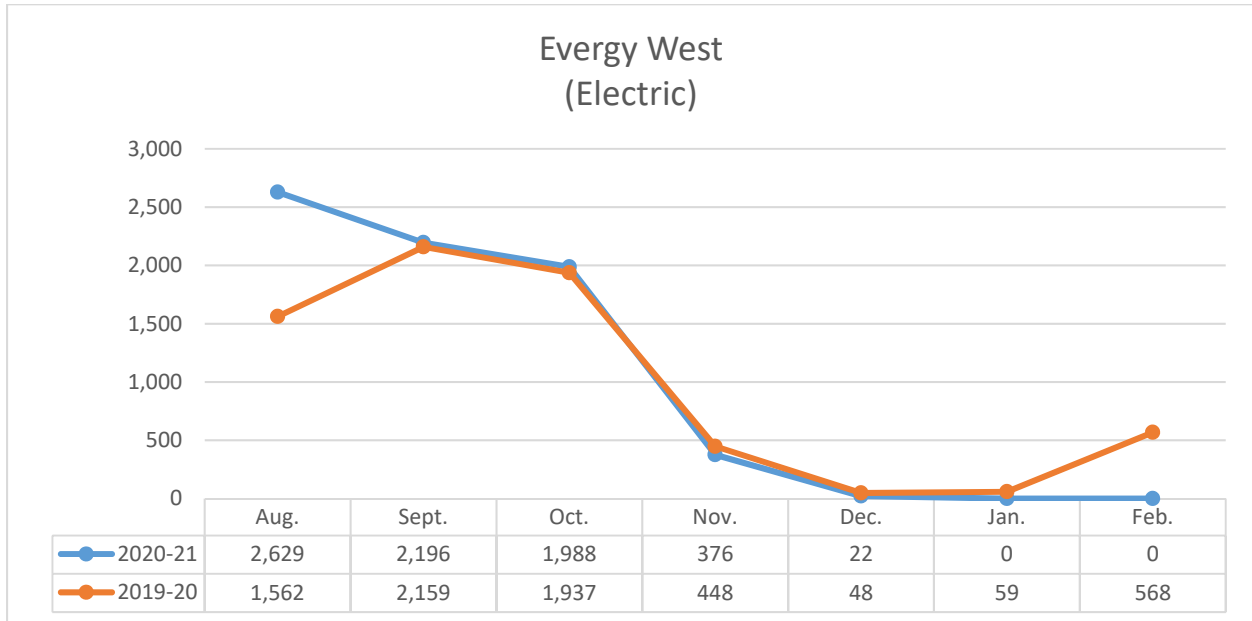
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 22% more Evergy Metro customers who participated in payment plans in February 2021 versus February 2020 and about 9% more in February 2021 than in January 2021.

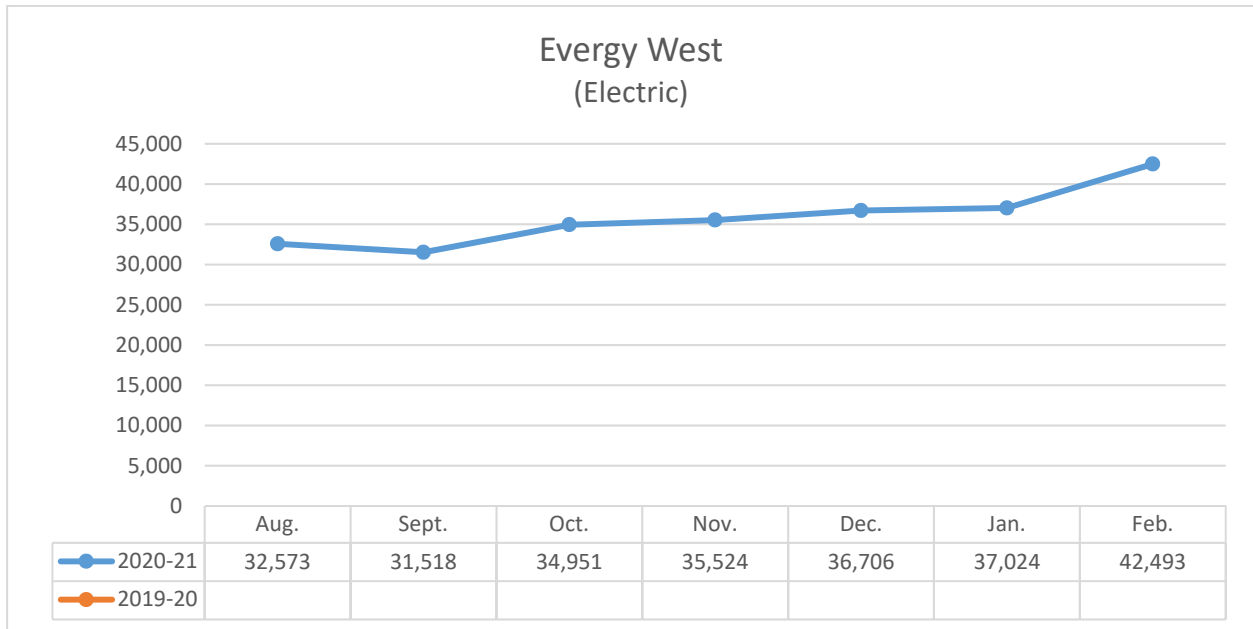
Questions 1 & 3 (Evergy West – Electric)

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



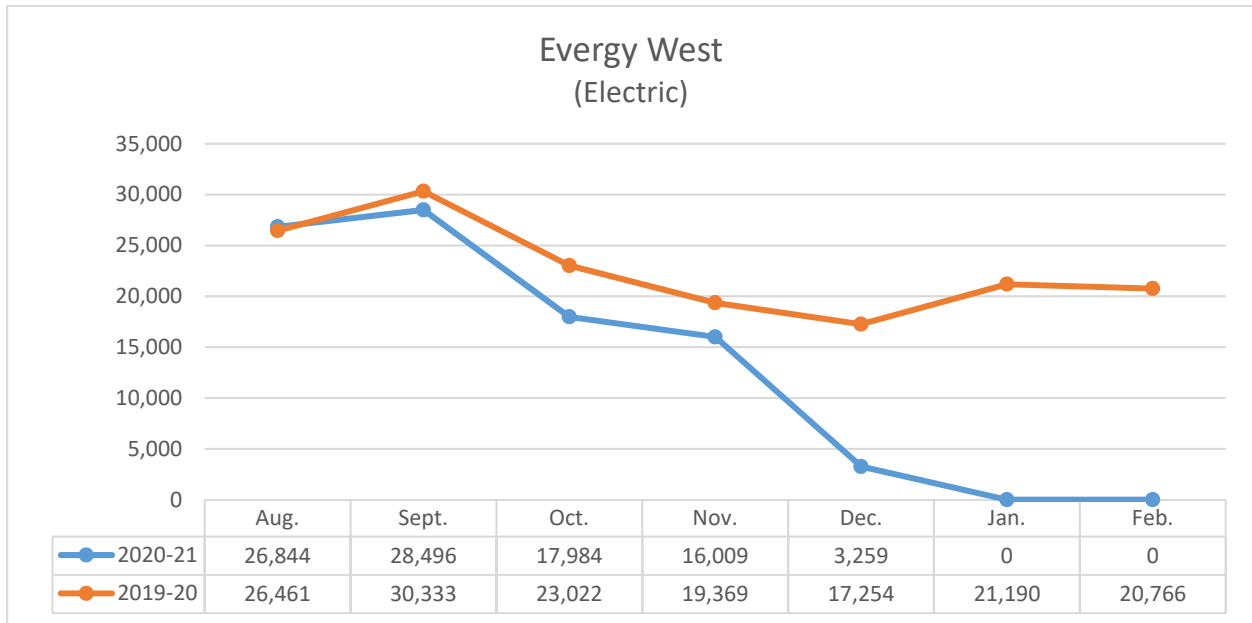
As shown in the previous graph, Evergy West performed no disconnections for non-payment in February 2021 versus 568 in February 2020 and none in January 2021. The number of actual disconnections by Evergy West in February 2021 was the same as the number projected by Evergy West for the same month.

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”



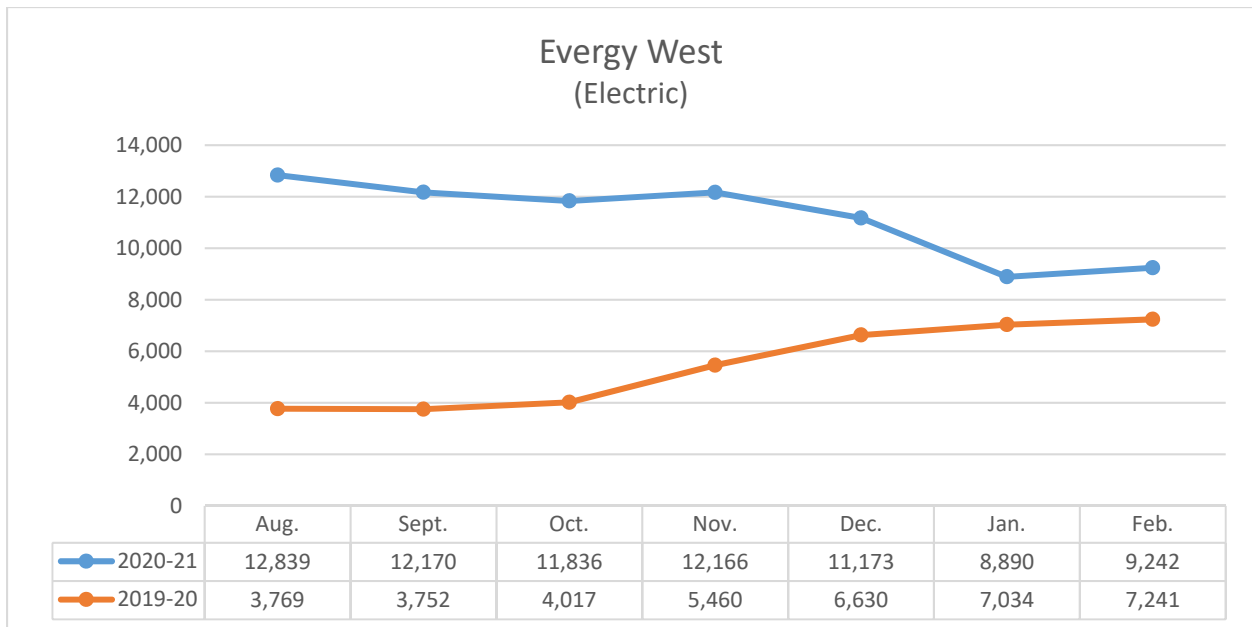
The previous data indicates that there were about 15% more Evergy West customers with past-due accounts in February 2021 versus January 2020. Evergy West indicated it is unable to provide comparable past-due data for August 2019 to February 2020. Evergy West defines past-due accounts as accounts that 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, no customers received a final disconnection notice in February 2021 versus 20,766 in February 2020 and none in January 2021.

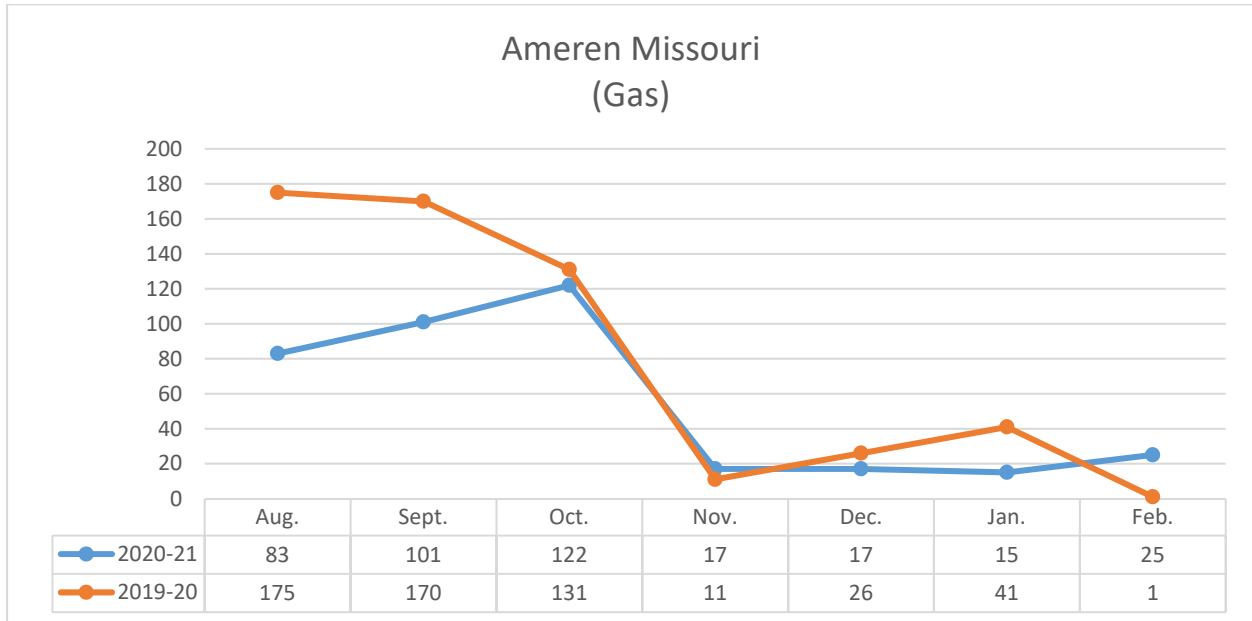
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 28% more Evergy West customers who participated in payment plans in February 2021 versus February 2020 and about 4% more in February 2021 than in January 2021.

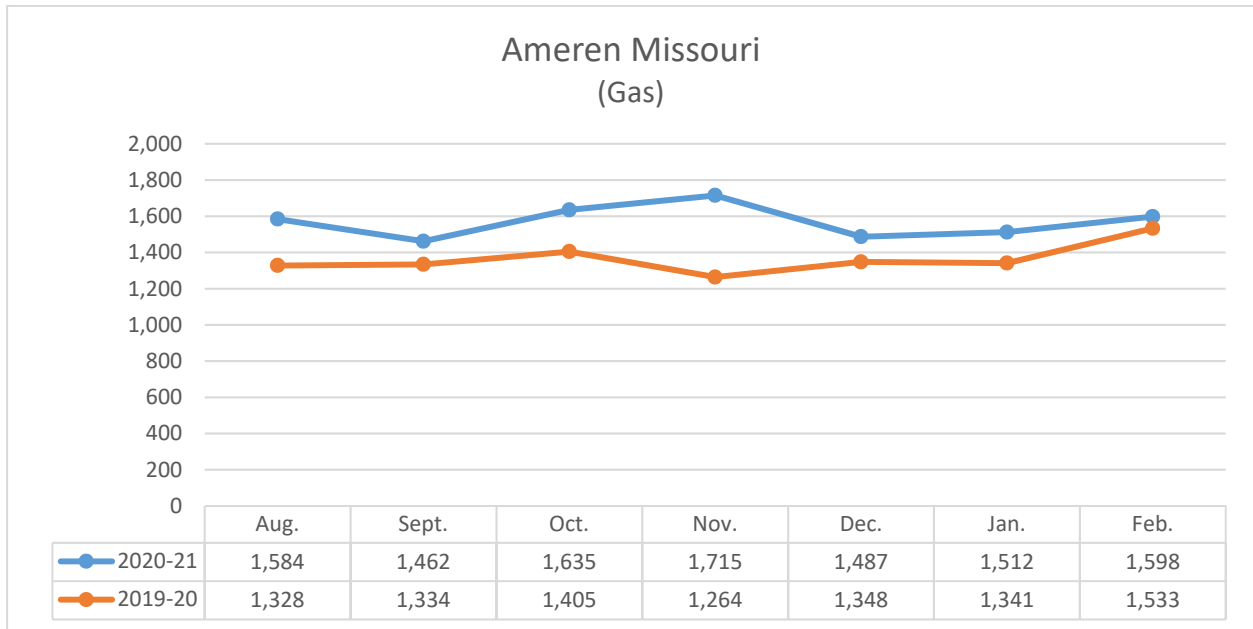
Questions 1 & 3 (Ameren Missouri – Gas)

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



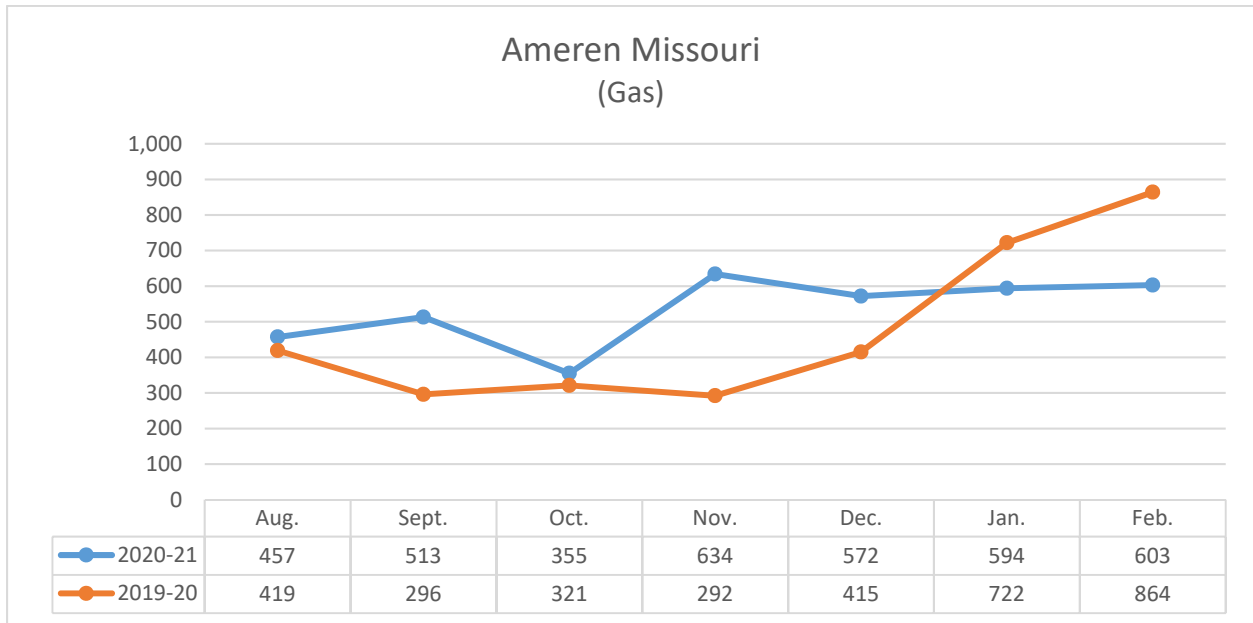
As shown in the previous graph, Ameren Missouri performed approximately 2,400% more disconnections for non-payment in February 2021 versus February 2020 (only one disconnection in 2020 compared to 25 in 2021), and 67% more in February 2021 as in January 2021. The number of actual disconnections by Ameren Missouri in January 2021 was approximately 1,150% 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”



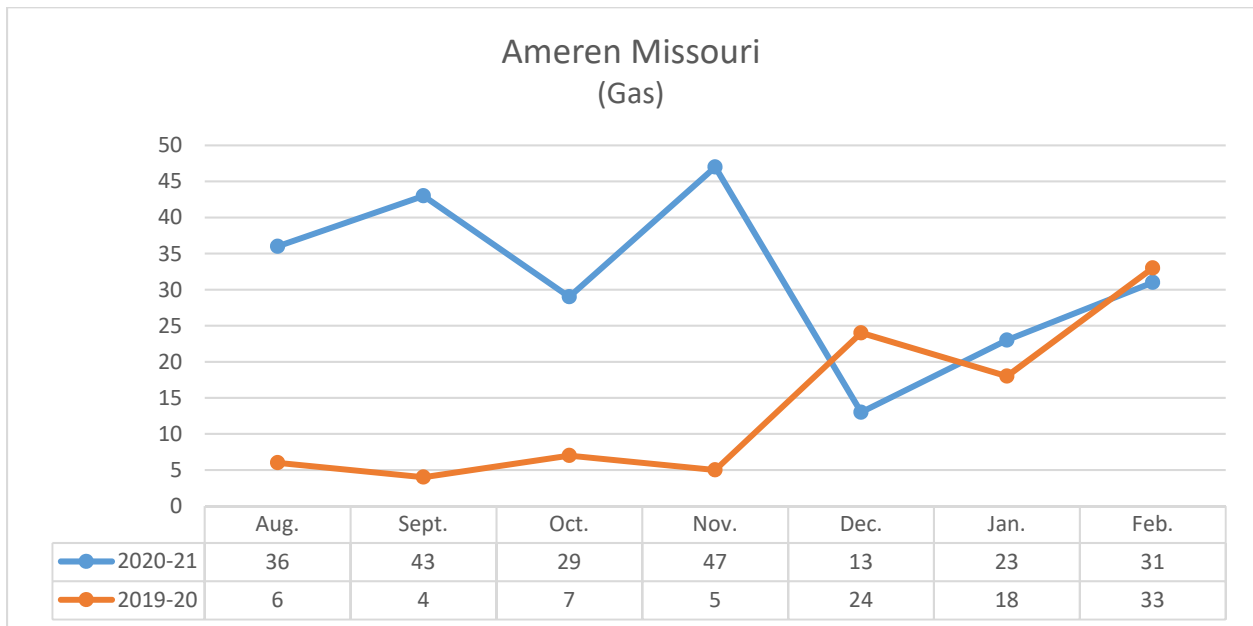
The previous data indicates that there were about 4% more Ameren Missouri customers with past-due accounts in February 2021 versus February 2020 and about 6% more in February 2021 than in January 2021. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

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 about 30% fewer customers who were not disconnected in February 2021 versus February 2020 and about 2% more in February 2021 than in January 2021.

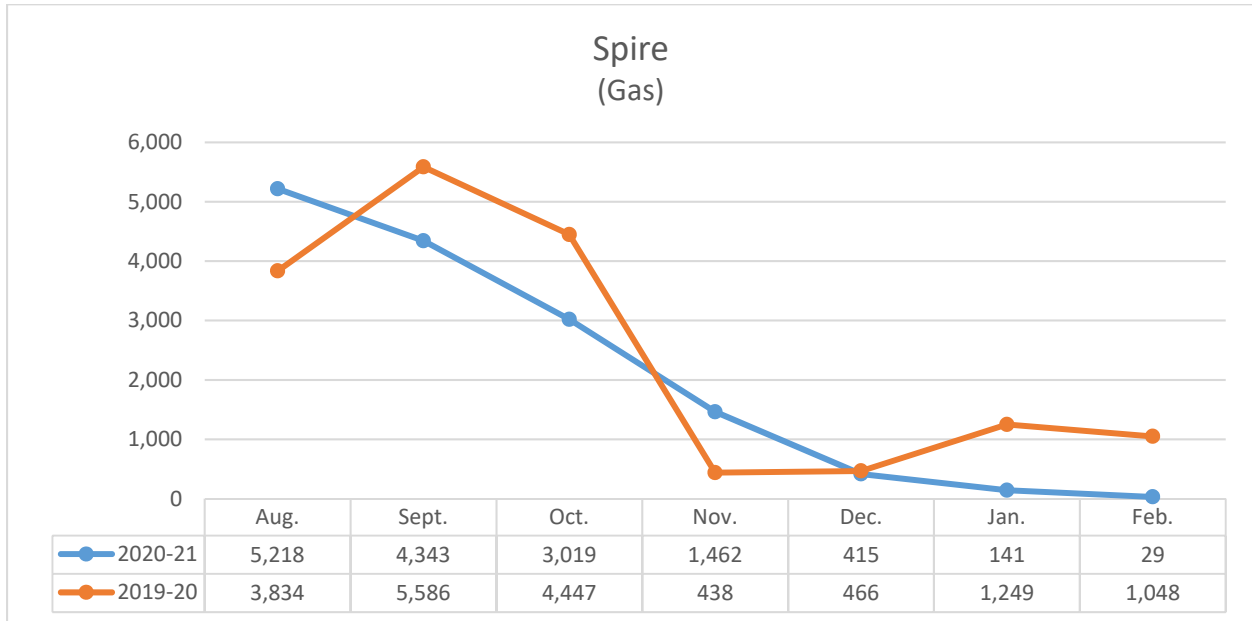
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 6% fewer Ameren Missouri customers who participated in payment plans in February 2021 versus February 2020 and about 35% more in February 2021 than in January 2021.

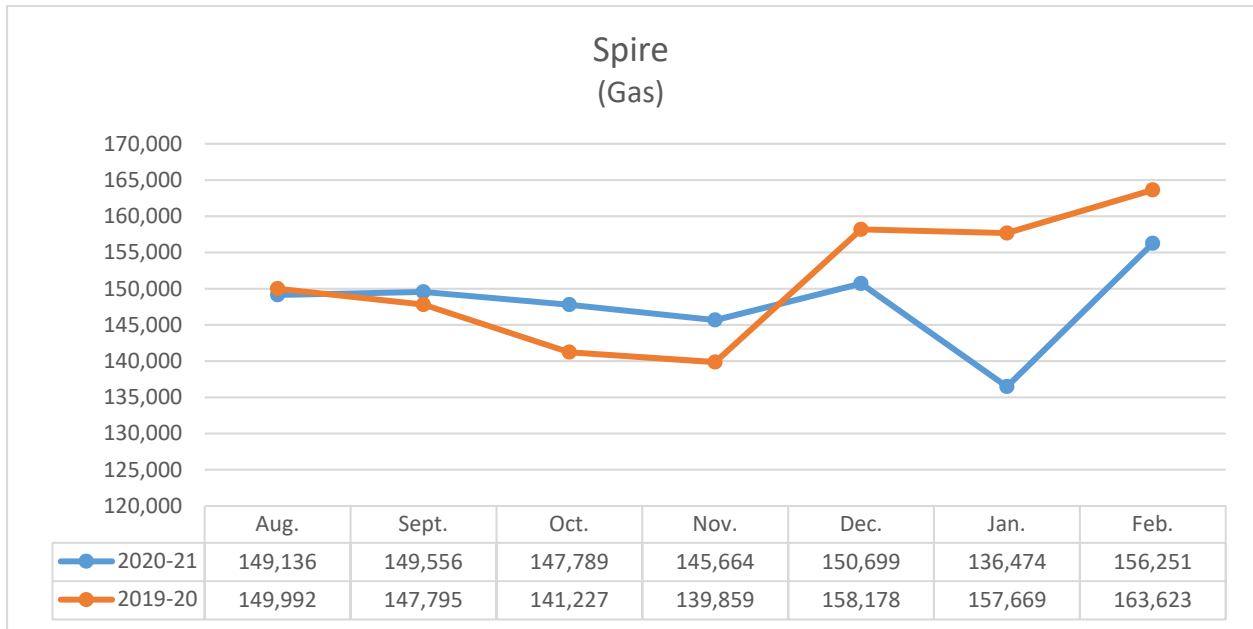
Questions 1 & 3 (Spire - Gas)

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



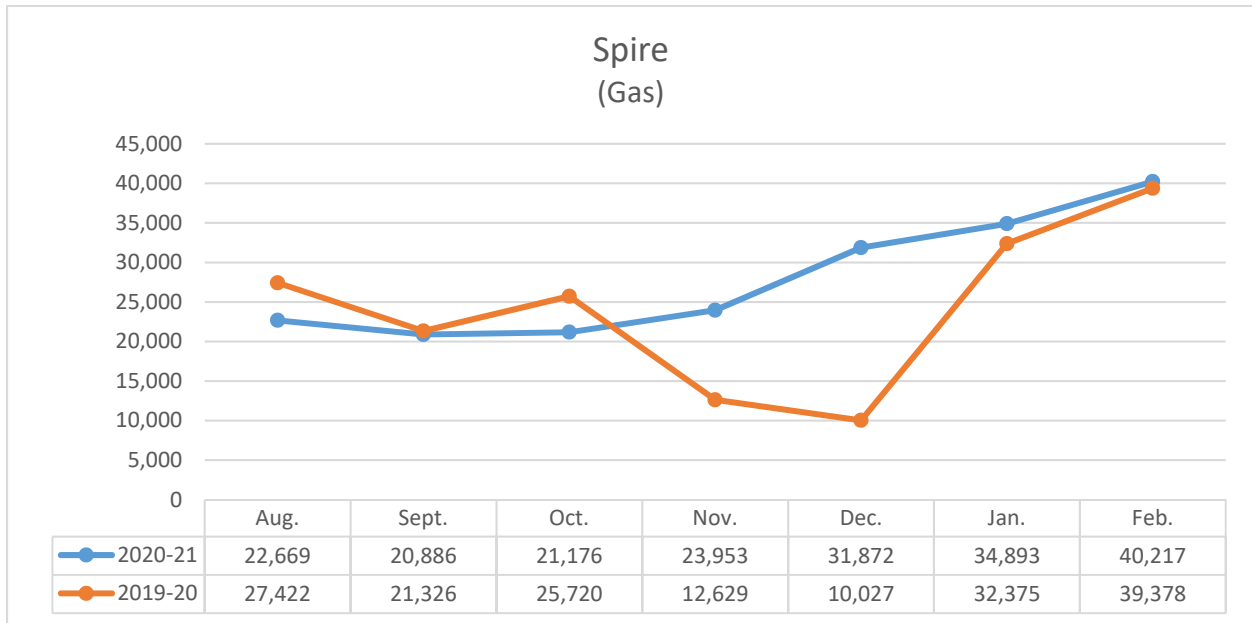
As shown in the previous graph, Spire performed approximately 97% fewer disconnections for non-payment in February 2021 versus February 2020 and approximately 79% less in February 2021 than in January 2021. The number of actual disconnections by Spire in February 2021 was approximately 99% below the 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”



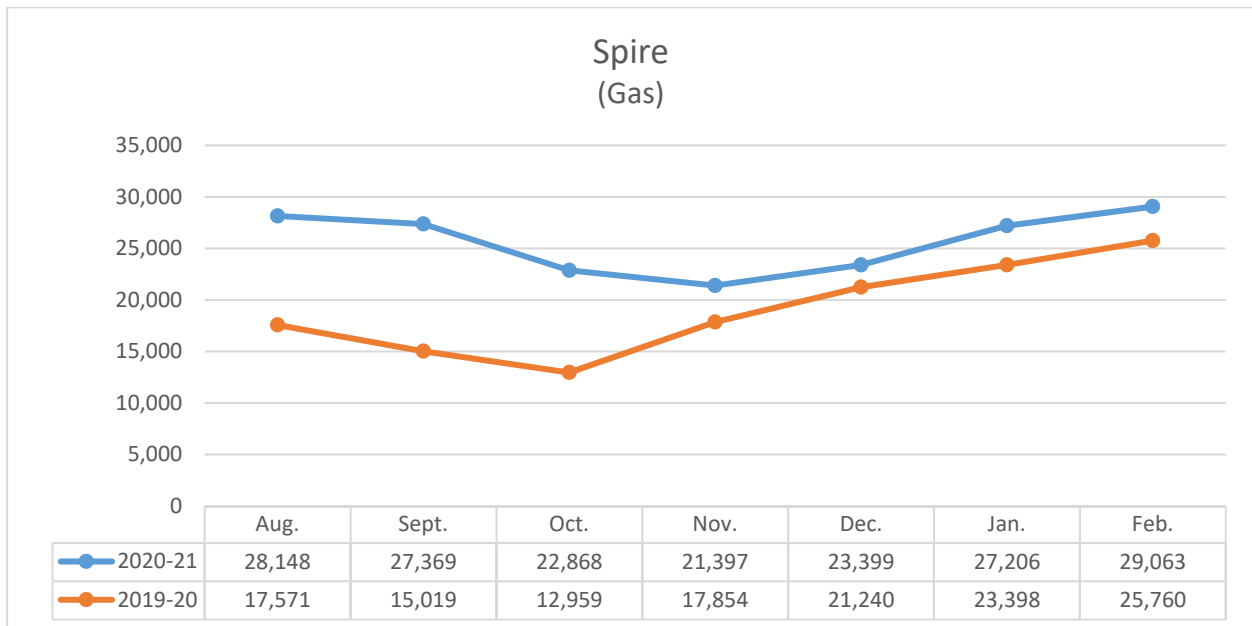
The previous data indicates that there were about 5% fewer Spire customers with past-due accounts in February 2021 versus February 2020 and approximately 14% more in February 2021 than in January 2021. Spire reported that past-due accounts are defined as accounts with arrear amounts owed for over 30 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 2% more customers who were not disconnected in February 2021 versus February 2020 and approximately 15% more in February 2021 than in January 2021.

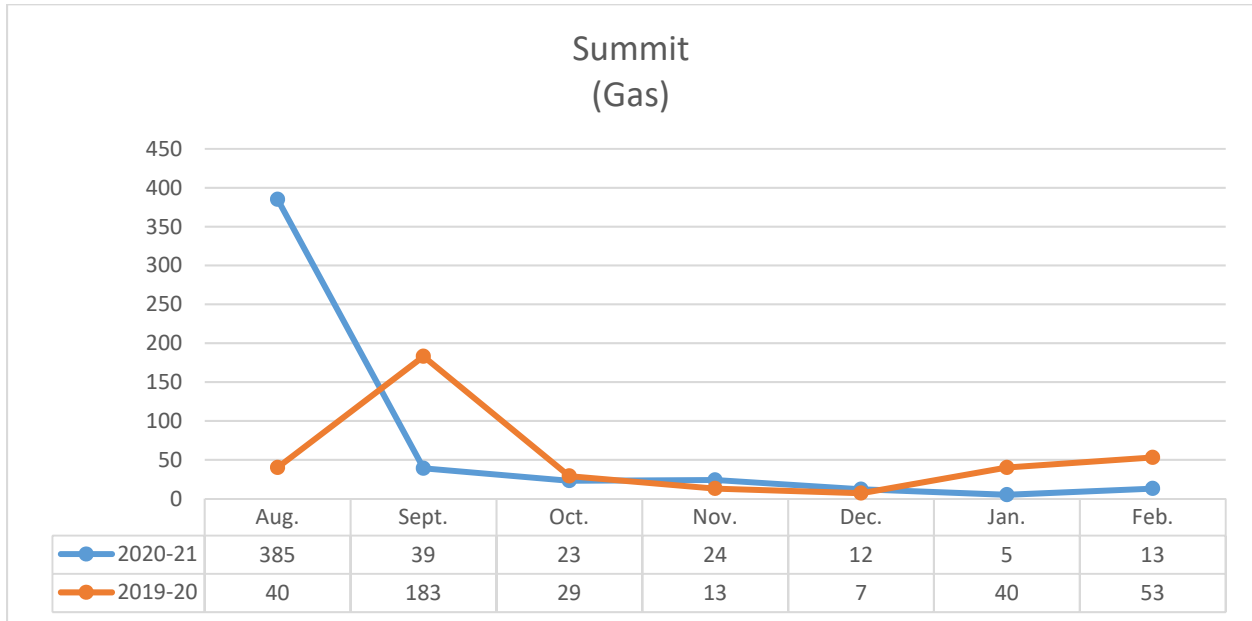
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 13% more Spire customers who participated in payment plans in February 2021 versus February 2020 and about 7% more in February 2021 than in January 2021.

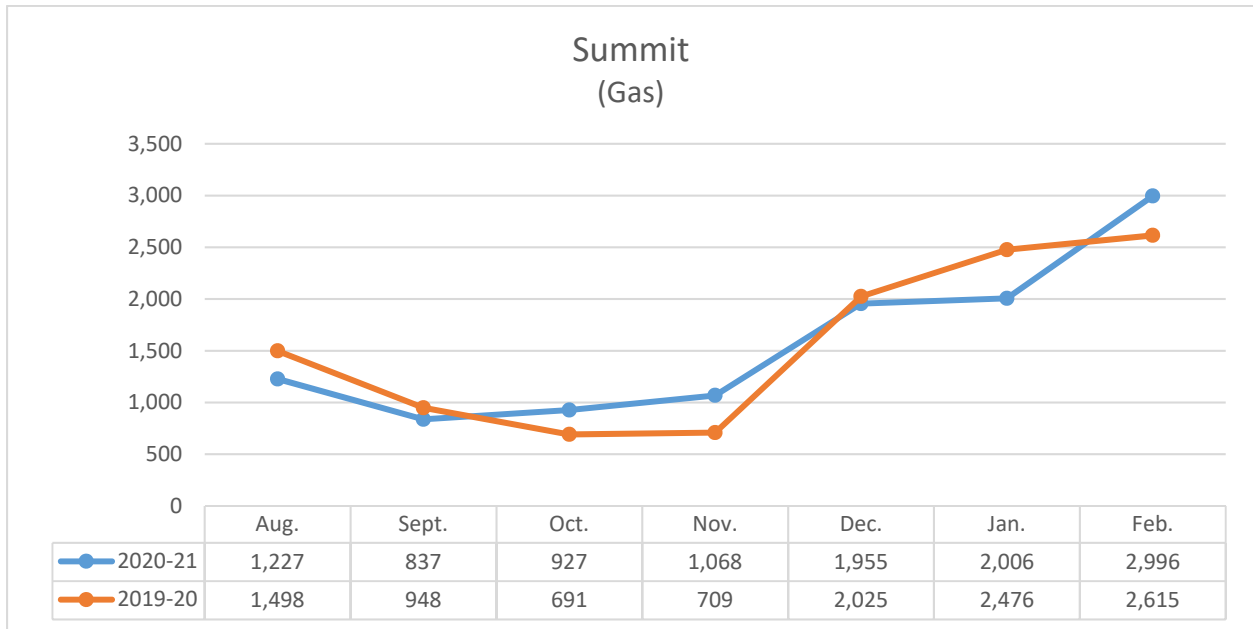
Questions 1 & 3 (Summit - Gas)

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



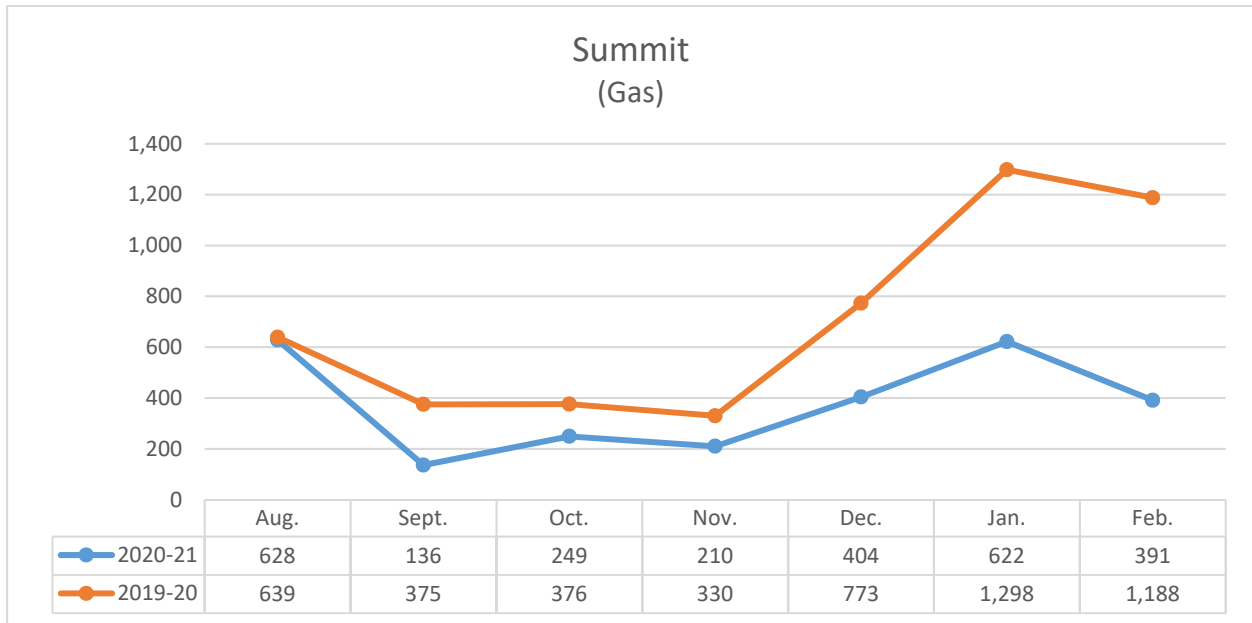
As shown in the previous graph, Summit performed approximately 75% fewer disconnections for non-payment in February 2021 versus February 2020 and about 160% more in February 2021 than in January 2021. The number of actual disconnections by Summit in February 2021 was approximately 76% below the number 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”



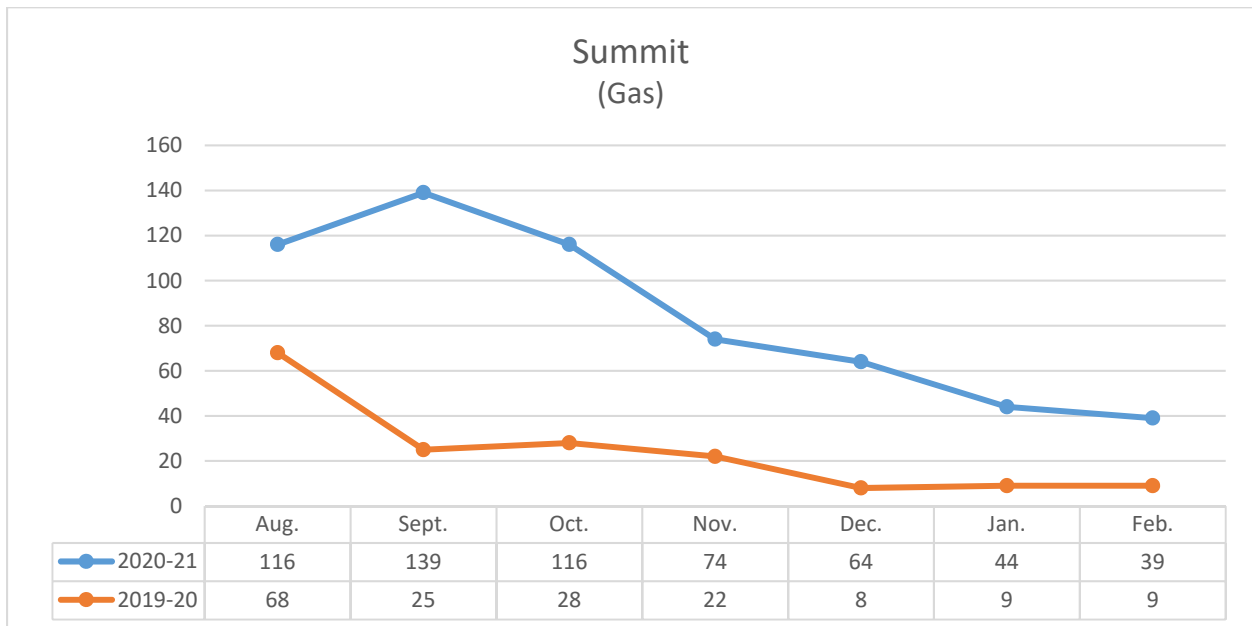
The previous data indicates that there were about 15% more Summit customers with past-due accounts in February 2021 versus February 2020 and approximately 49% more in February 2021 than in January 2021. Summit did not respond how it defines past-due accounts.

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 about 67% fewer customers who were not disconnected in February 2021 versus February 2020 and approximately 37% less in February 2021 than in January 2021.

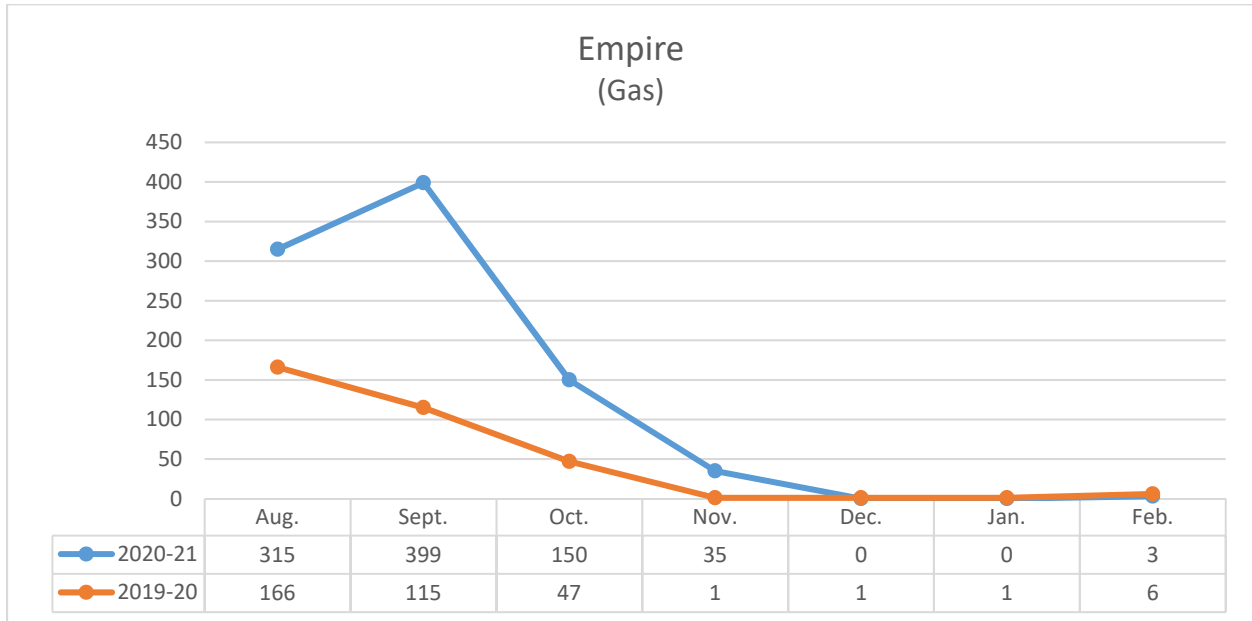
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 333% more Summit customers who participated in payment plans in February 2021 versus February 2020 and about 11% fewer in February 2021 than in January 2021.

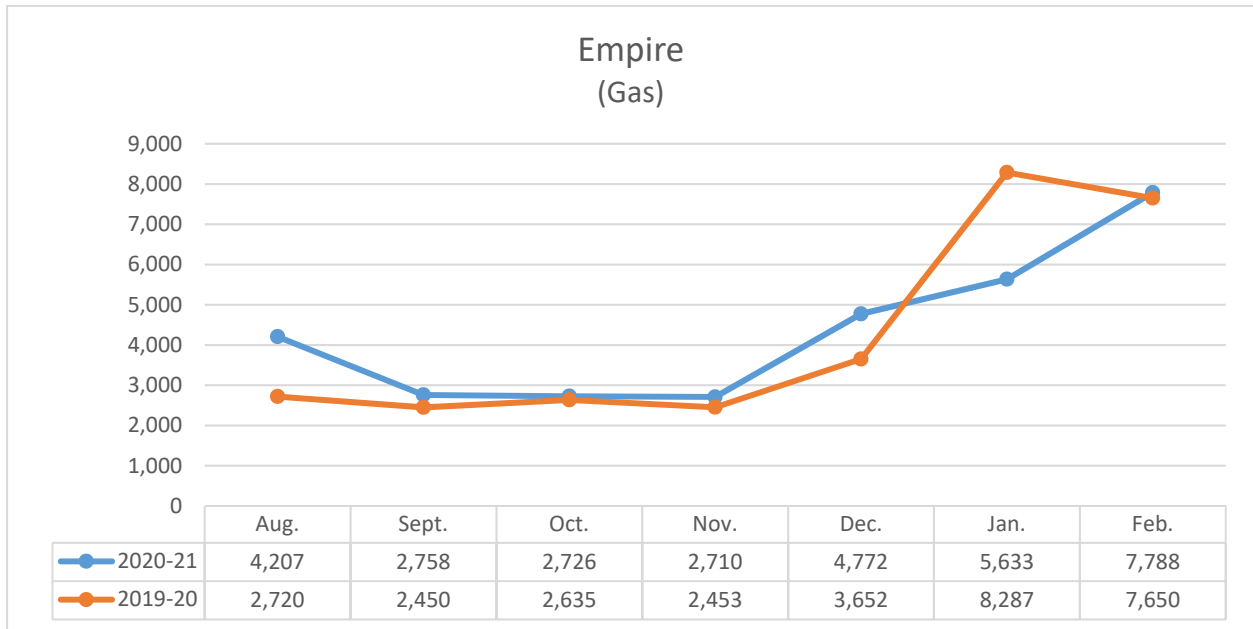
Questions 1 & 3 (Empire - Gas)

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



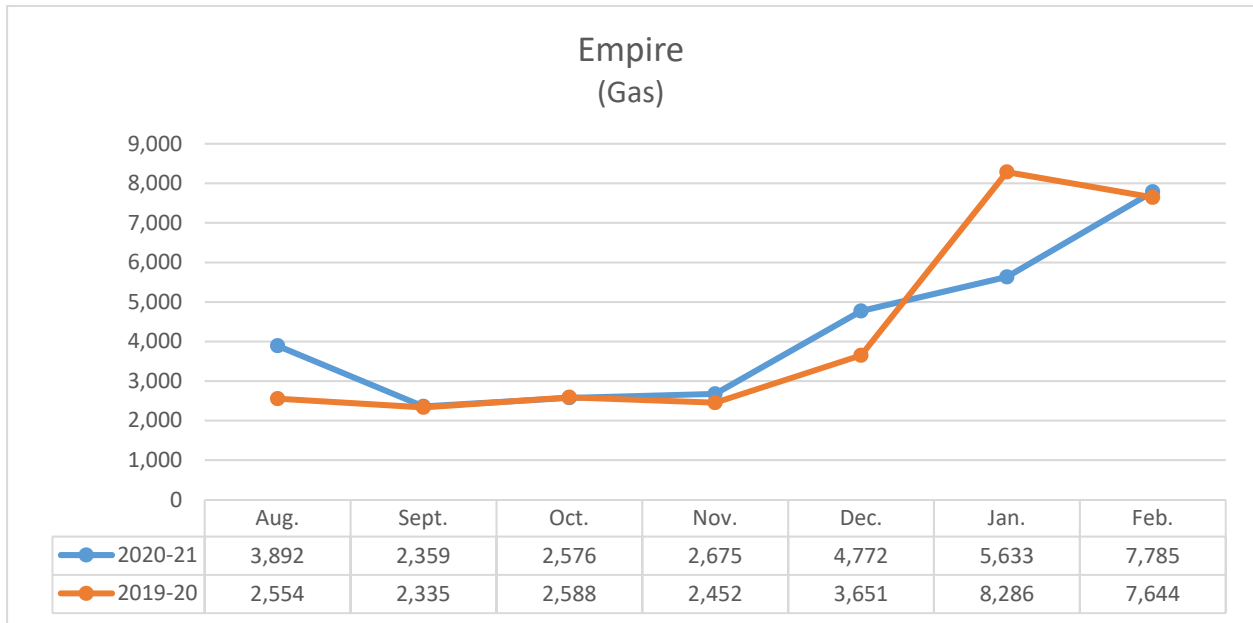
As shown in the previous graph, Empire performed approximately 50% fewer disconnections for non-payment in February 2021 versus February 2020, and the 3 disconnections for non-payment in February 2021 compares to zero in January 2021. The number of actual disconnections by Empire in February 2021 was approximately 94% 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”



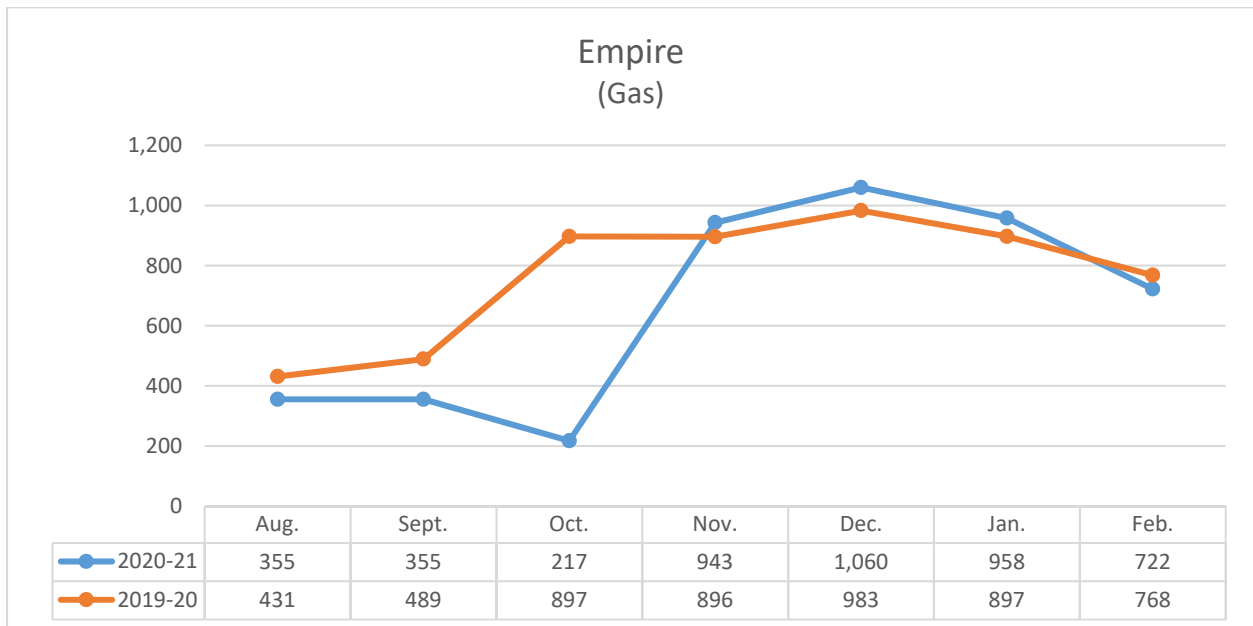
The previous data indicates that there were about 2% more Empire customers with past-due accounts in February 2021 versus February 2020 and approximately 38% more in February 2021 than in January 2021. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the 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 2% more customers who were not disconnected in February 2021 versus February 2020 and approximately 38% more in February 2021 than in January 2021.

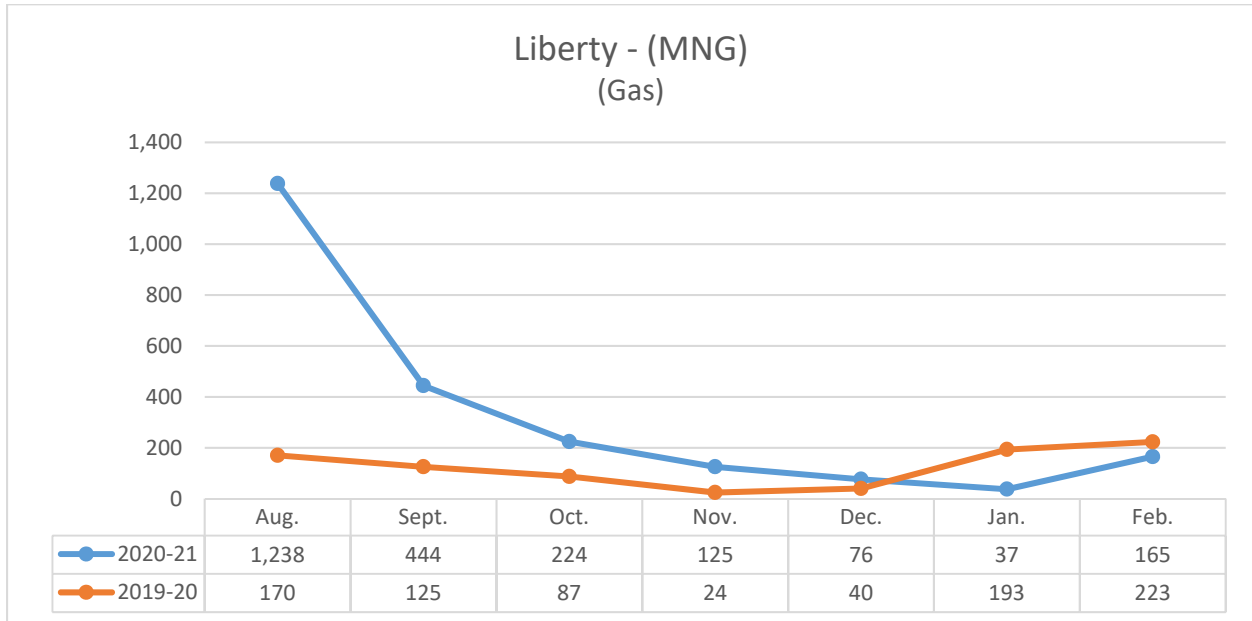
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 6% fewer Empire customers who participated in payment plans in February 2021 versus February 2020 and about 25% fewer in February 2021 than in January 2021.

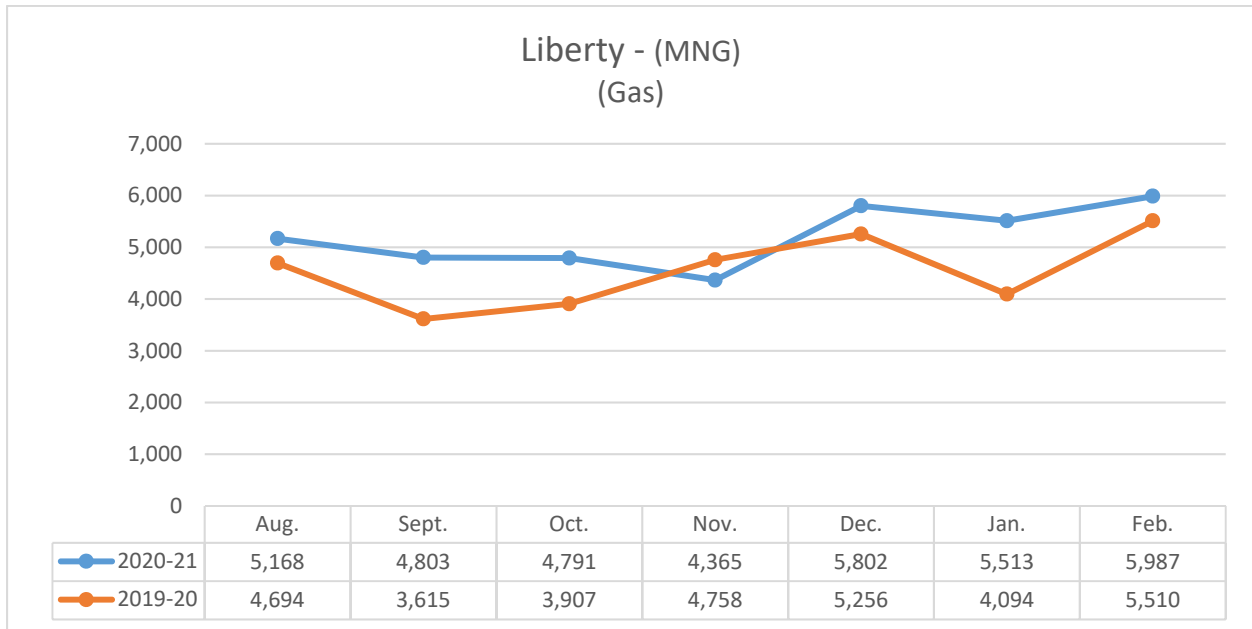
Questions 1 & 3 (Liberty - (MNG) - Gas)

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



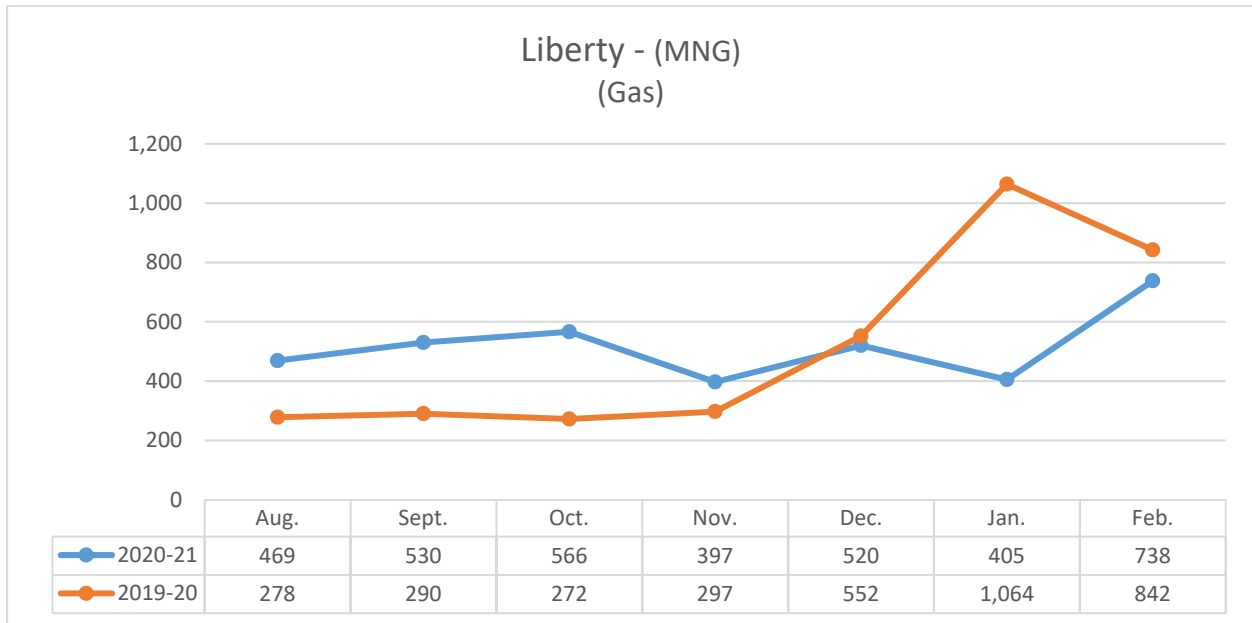
As shown in the previous graph, Liberty - (MNG) performed approximately 26% fewer disconnections for non-payment in February 2021 versus February 2020 and about 346% more in February 2021 than in January 2021. The number of actual disconnections by Liberty - (MNG) in February 2021 was approximately 38% above 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”



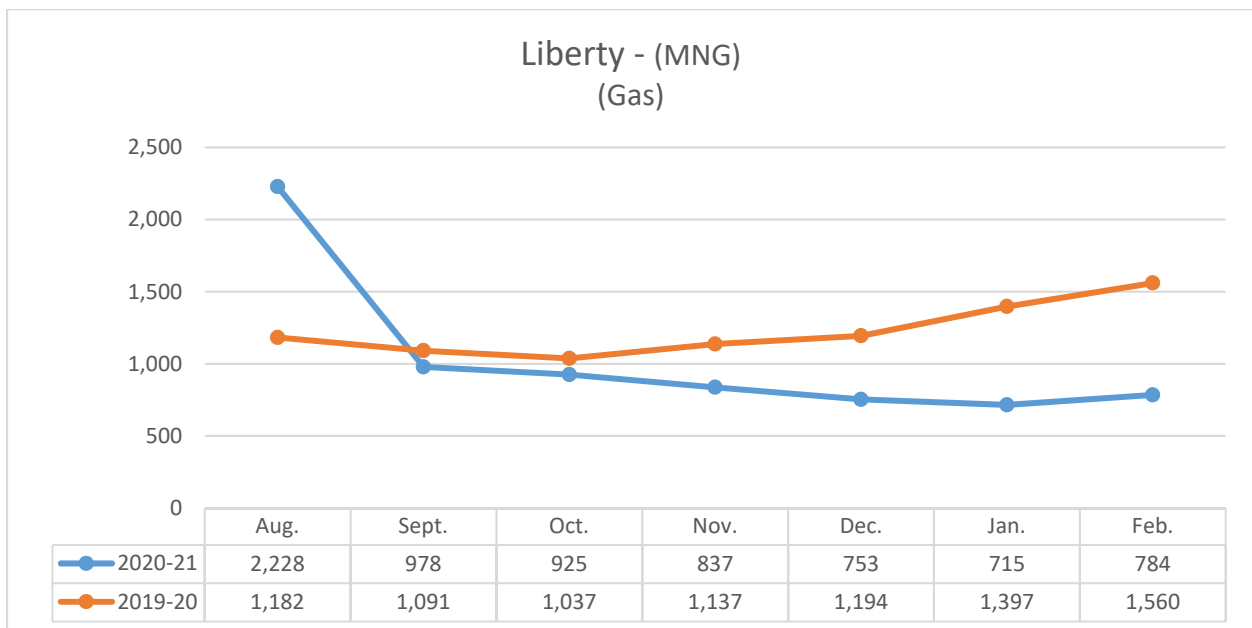
The previous data indicates that there were about 9% more Liberty - (MNG) customers with past-due accounts in February 2021 versus February 2020 and approximately 9% more in February 2021 than in January 2021. Liberty - (MNG) reported that it considers accounts past-due when they have a past-due balance 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 about 12% fewer customers who were not disconnected in February 2021 versus February 2020 and approximately 82% more in February 2021 than in January 2021.

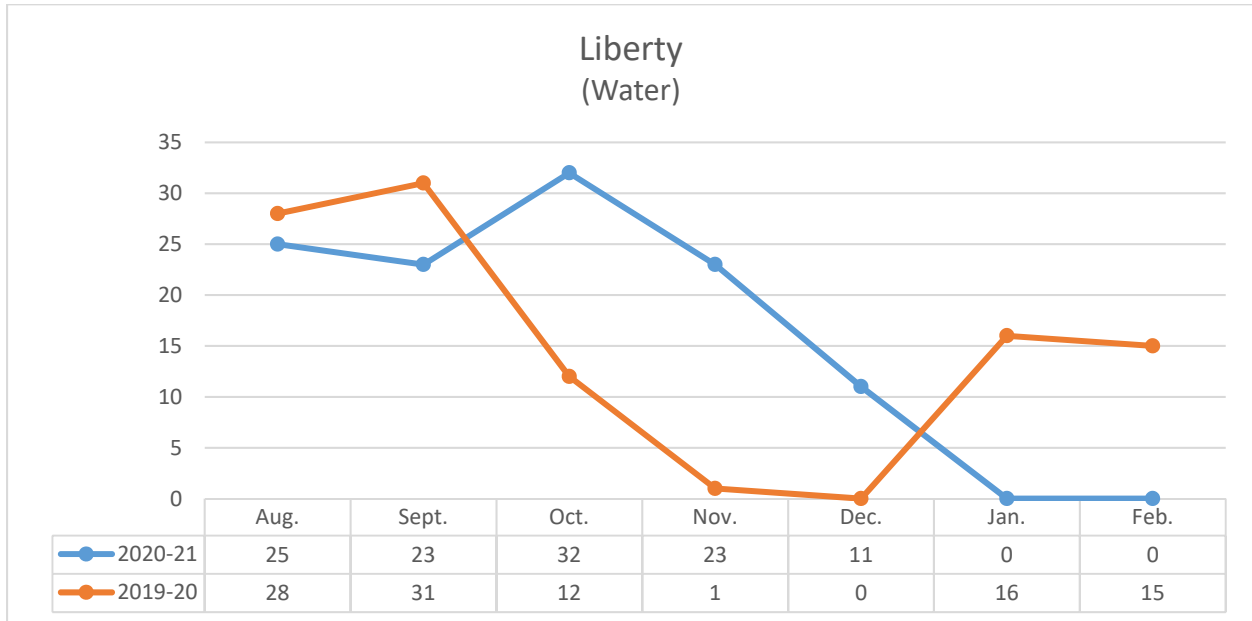
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 50% fewer Liberty - (MNG) customers who participated in payment plans in February 2021 versus February 2020 and 10% more in February 2021 than in January 2021.

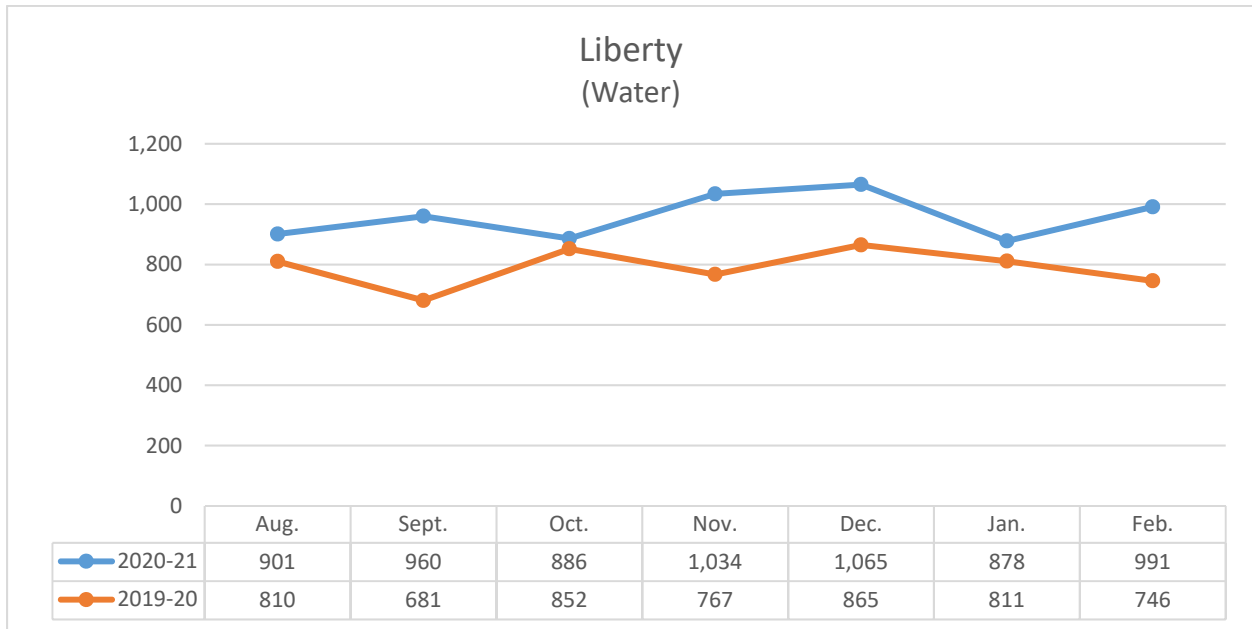
Questions 1 & 3 (Liberty - Water)

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



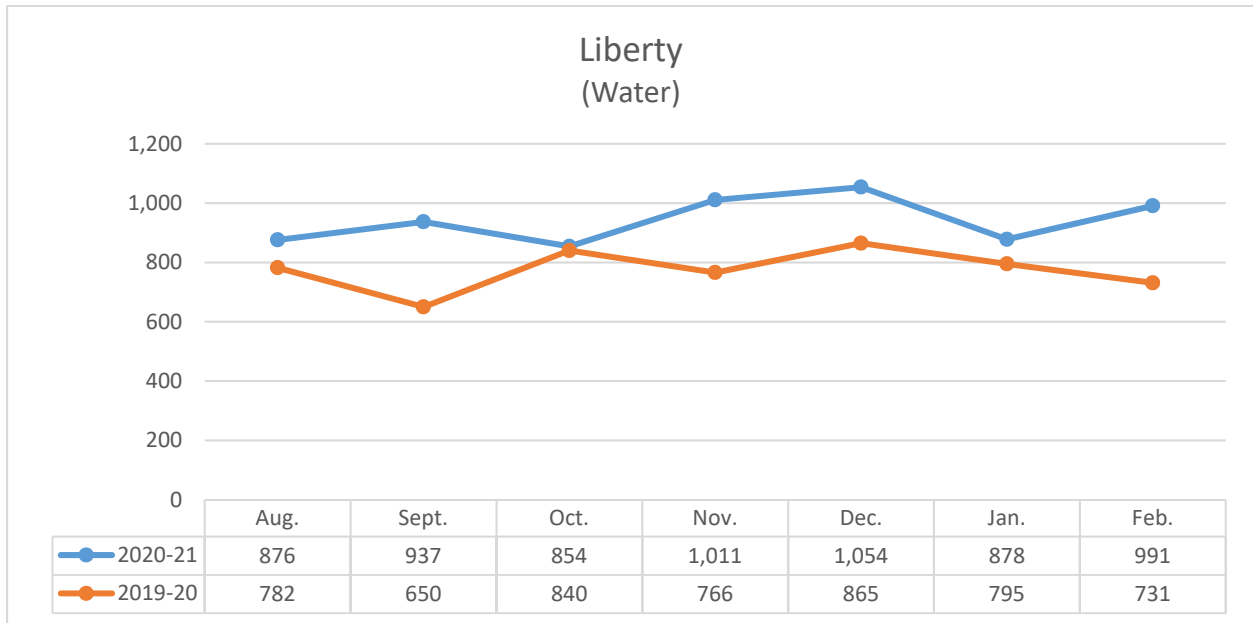
As shown in the previous graph, Liberty performed no disconnections for non-payment in February 2021 versus 15 in February 2020 and compared to none in January 2021. Liberty projected 40 disconnections for non-payment in February 2021.

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



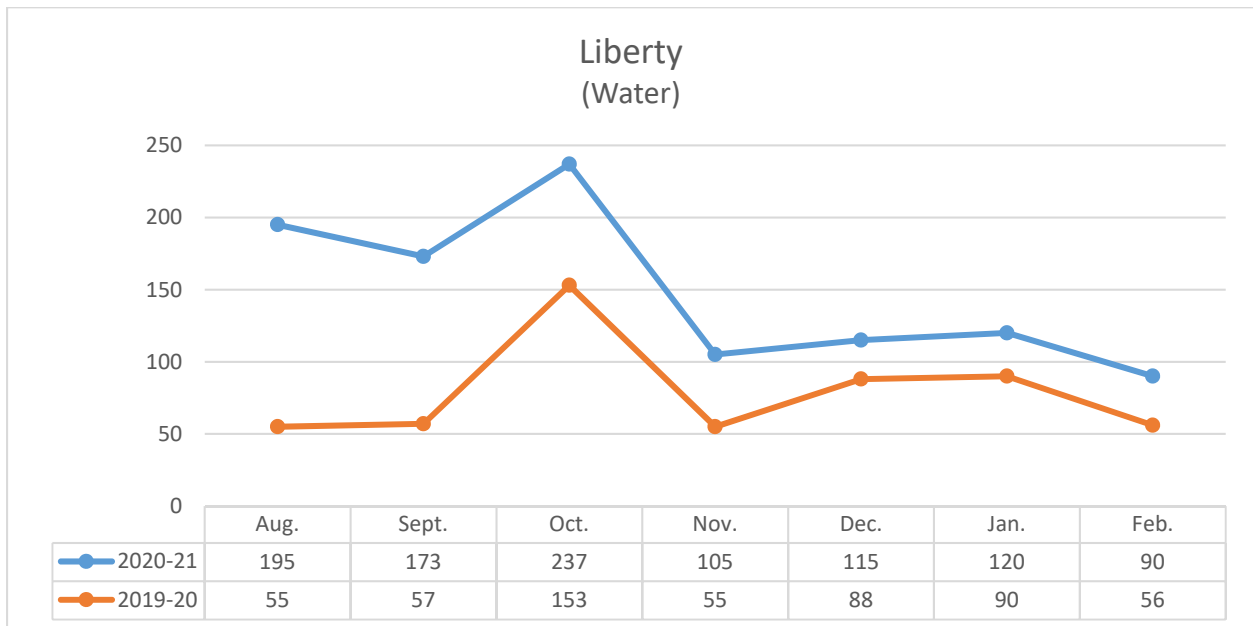
The previous data indicates that there were about 33% more Liberty customers with past-due accounts in February 2021 versus February 2020 and approximately 13% more in February 2021 than in January 2021. Liberty reported that a shut-off notice is sent for any account that owes \$50.00 or more after the 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 36% more customers who were not disconnected in February 2021 versus February 2020 and approximately 13% more in February 2021 than in January 2021.

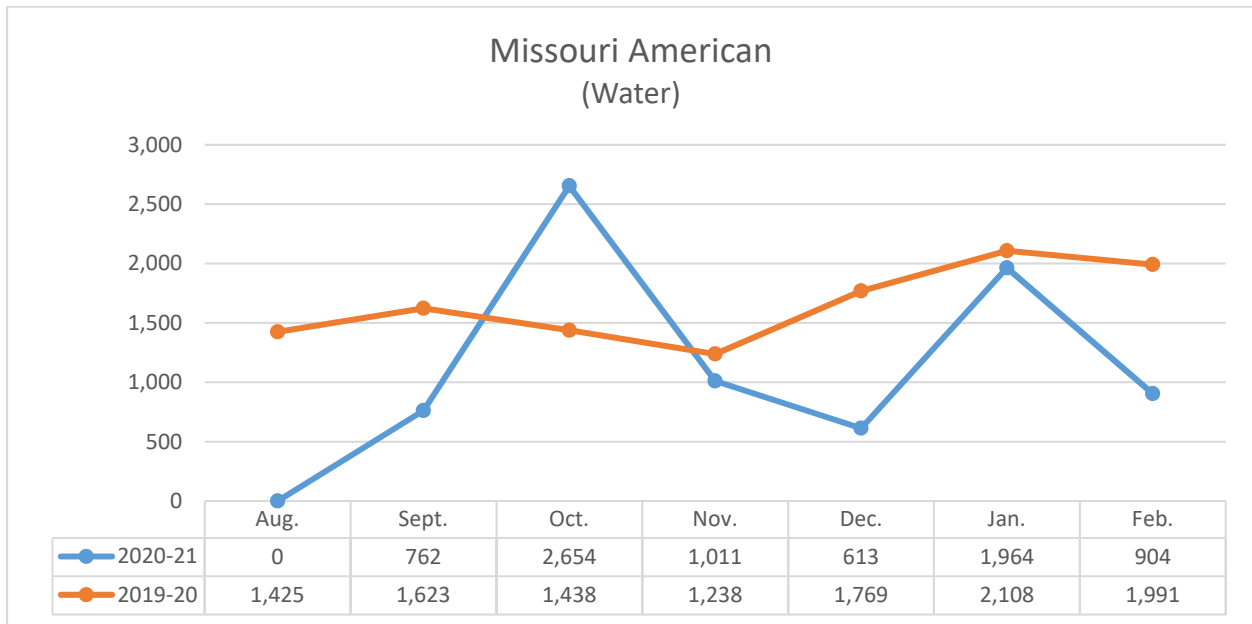
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 61% more Liberty customers who participated in payment plans in February 2021 versus February 2020 and about 25% fewer in February 2021 than in January 2021.

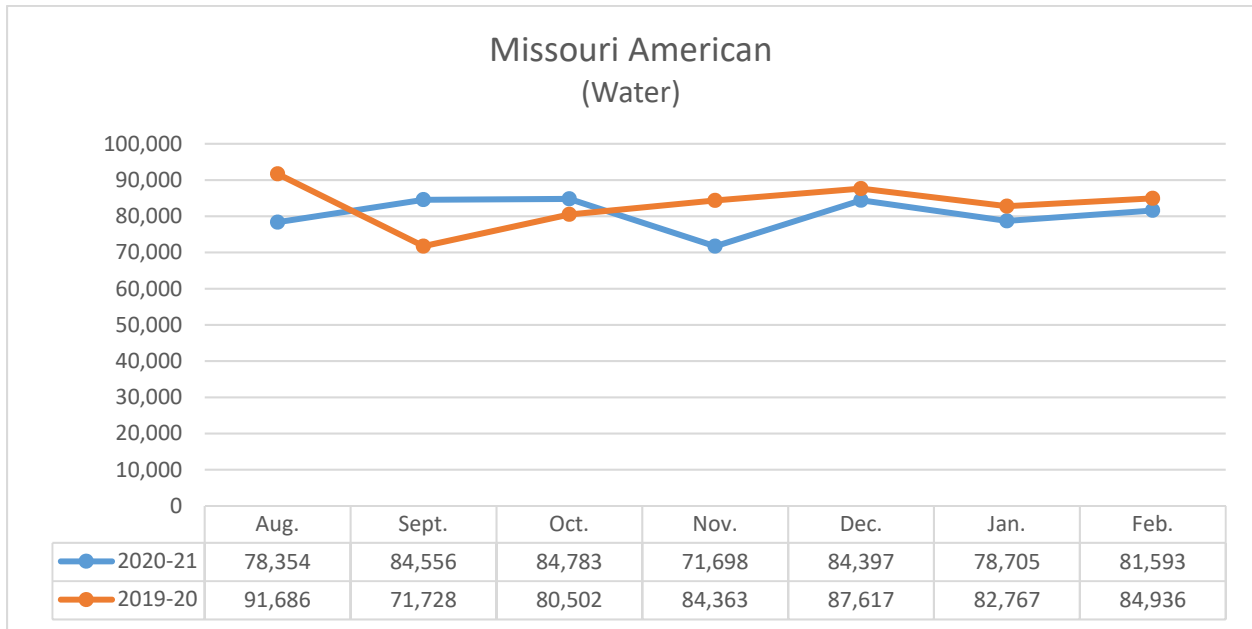
Questions 1 & 3 (Missouri-American - Water)

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



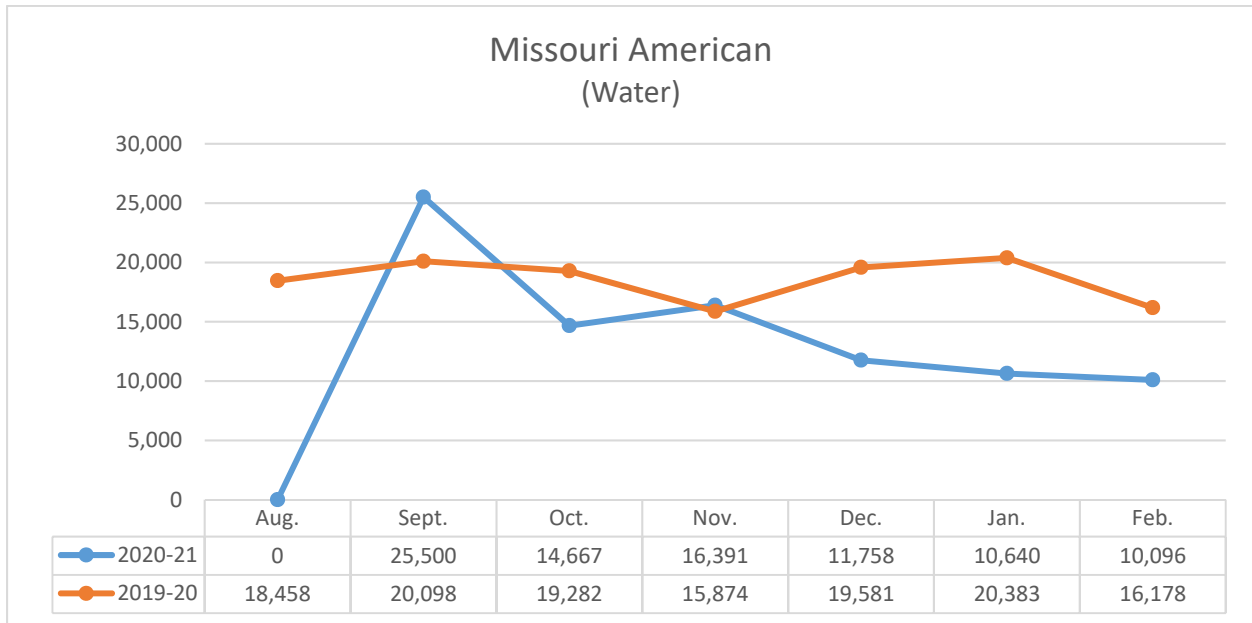
As shown in the previous graph, Missouri-American performed approximately 55% fewer disconnections for non-payment in February 2021 versus February 2020 and about 54% less in February 2021 than in January 2021. Missouri-American does not forecast the number of disconnections for non-payment.

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”



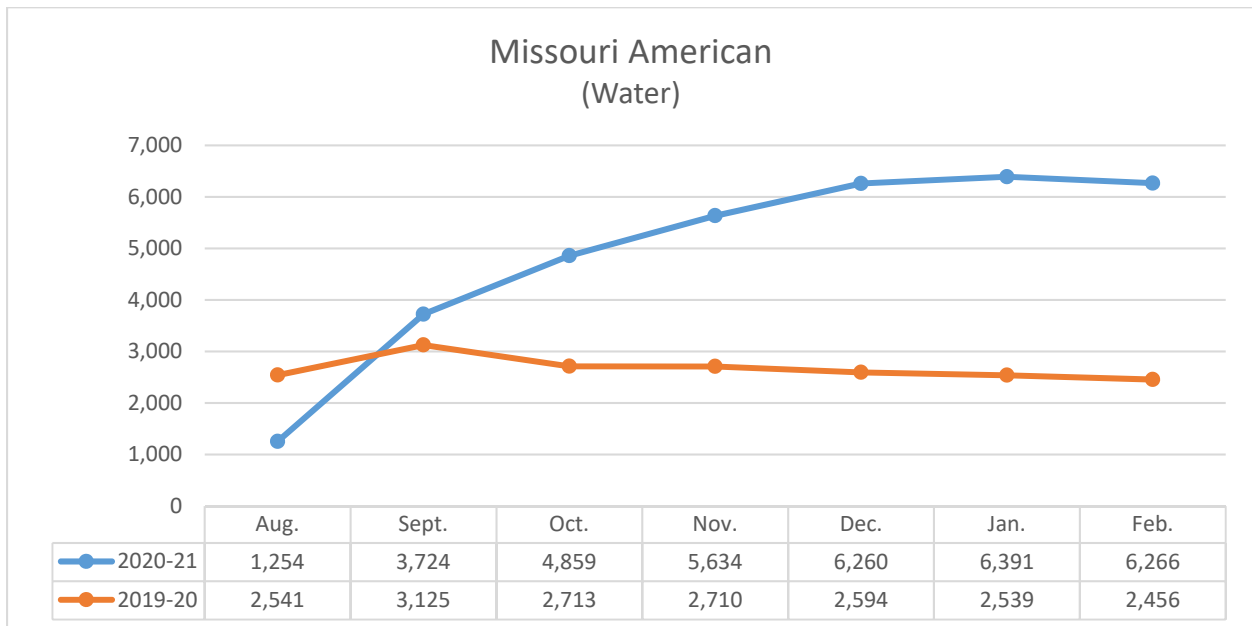
The previous data indicates that there were about 4% fewer Missouri-American customers with past-due accounts in February 2021 versus February 2020 and approximately 4% more in February 2021 than in January 2021. Missouri-American reported that it defines “past-due” as any unpaid amount past the due 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 about 38% fewer customers who were not disconnected in February 2021 versus February 2020 and approximately 5% less in February 2021 than in January 2021.

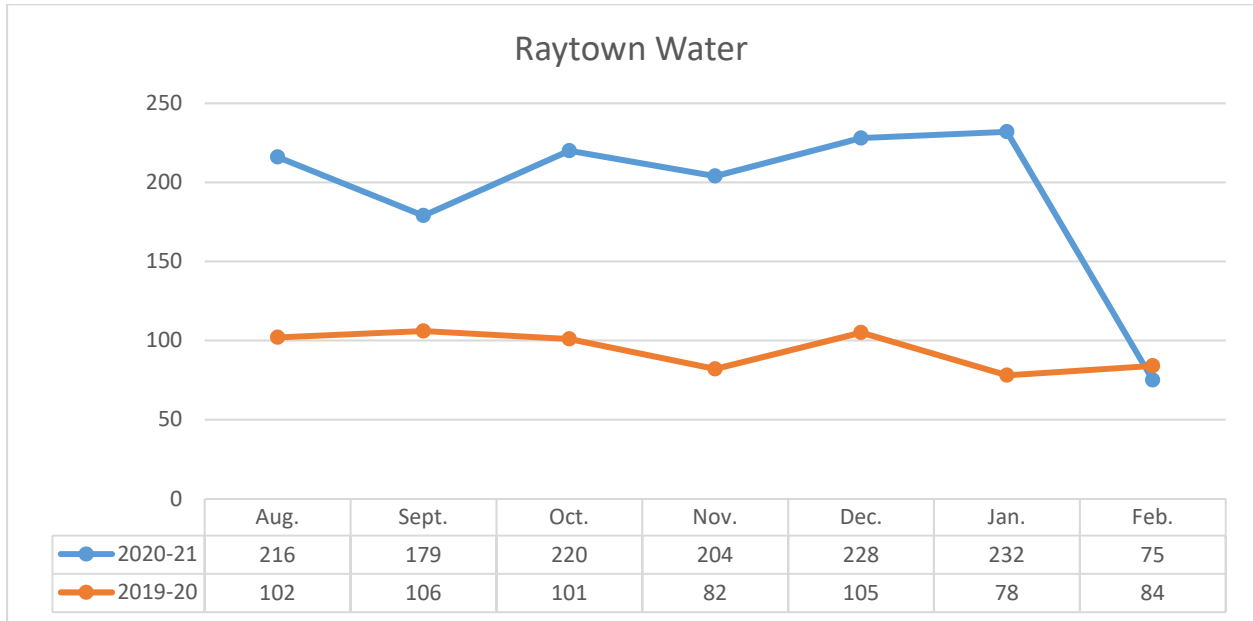
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 155% more Missouri-American customers who participated in payment plans in February 2021 versus February 2020 and about 2% fewer in February 2021 than in January 2021.

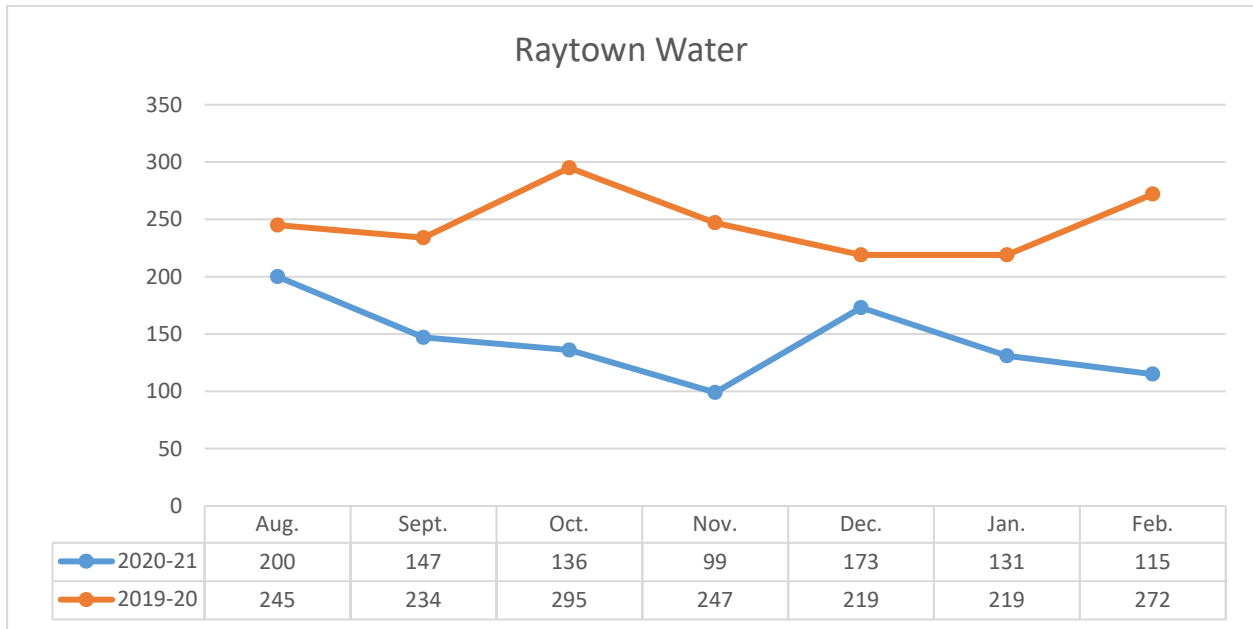
Questions 1 & 3 (Raytown Water)

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



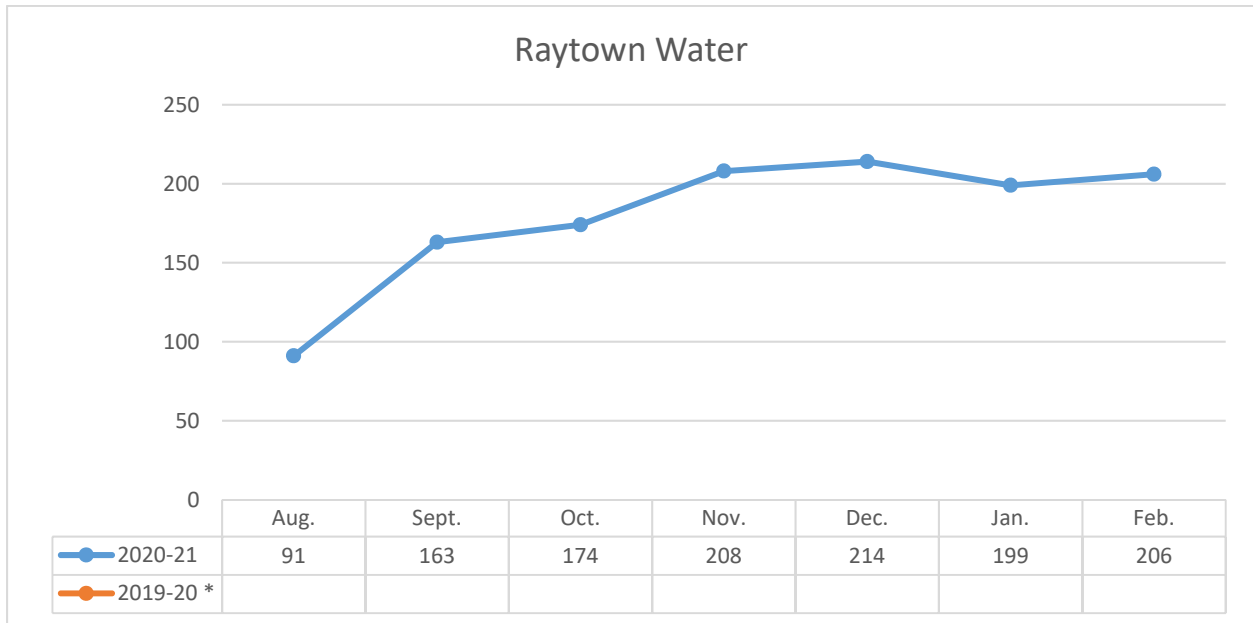
As shown in the previous graph, Raytown Water performed approximately 11% fewer disconnections for non-payment in February 2021 versus February 2020 and about 68% less in February 2021 than in January 2021. The number of actual disconnections by Raytown Water in February 2021 was approximately 4% above 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 58% fewer Raytown Water customers with past-due accounts in February 2021 versus February 2020 and approximately 12% less in February 2021 than in January 2021. Raytown Water reported that it defines “past-due” as accounts with balances that are over 31 days.

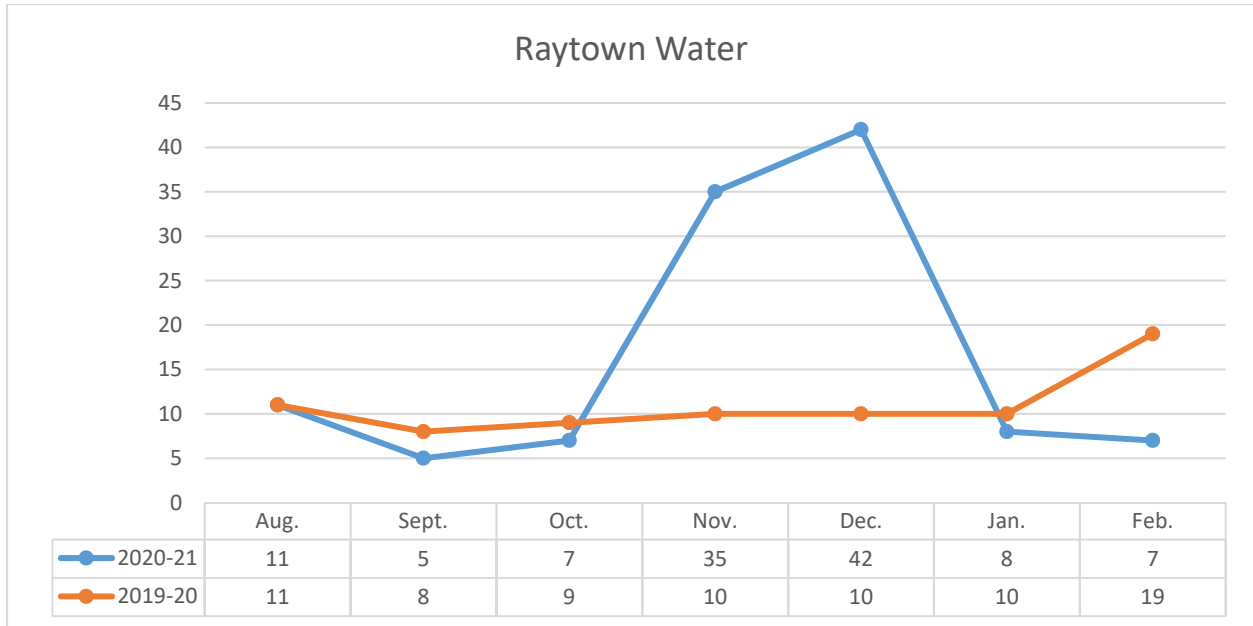
c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



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

As shown by Raytown Water’s data, 206 customers received a final disconnection notice in February 2021 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 4% more customers that received a final disconnection notice but were not disconnected for non-payment of service in February 2021 than in January 2021.

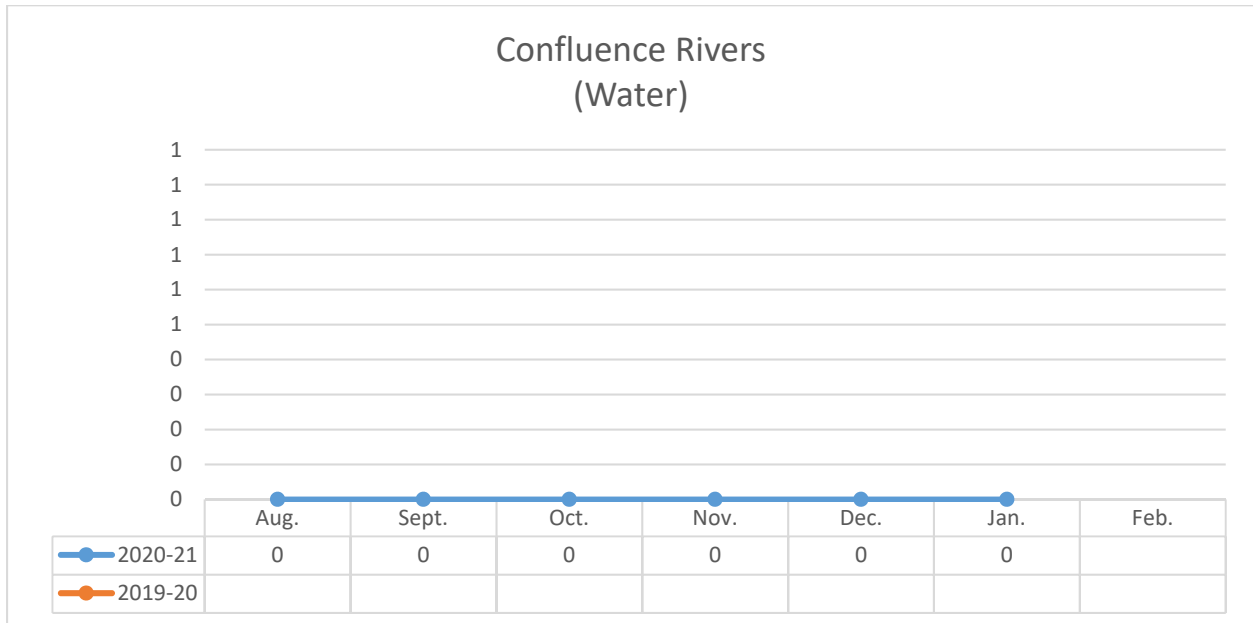
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 63% fewer Raytown Water customers who participated in payment plans in February 2021 versus February 2020 and about 13% fewer in February 2021 than in January 2021.

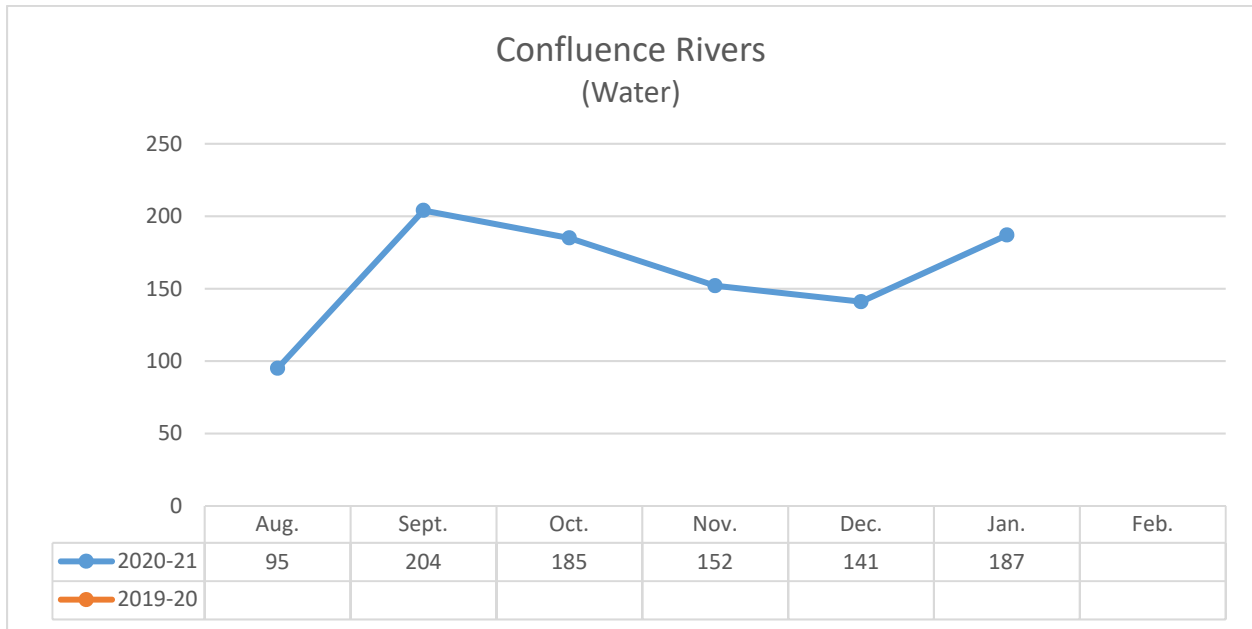
Questions 1 & 3 (Confluence Rivers - Water)

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



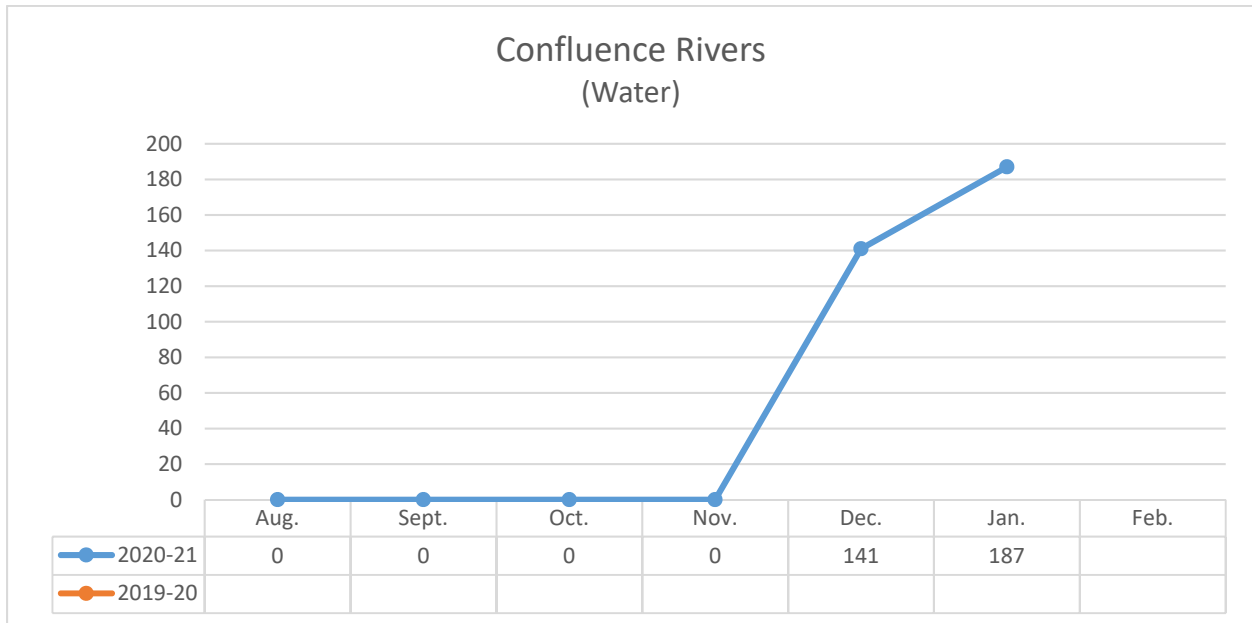
As shown in the previous graph, Confluence Rivers performed no disconnections in January 2021. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 24 disconnections was performed. Confluence Rivers does not forecast the number of disconnections for non-payment.

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”



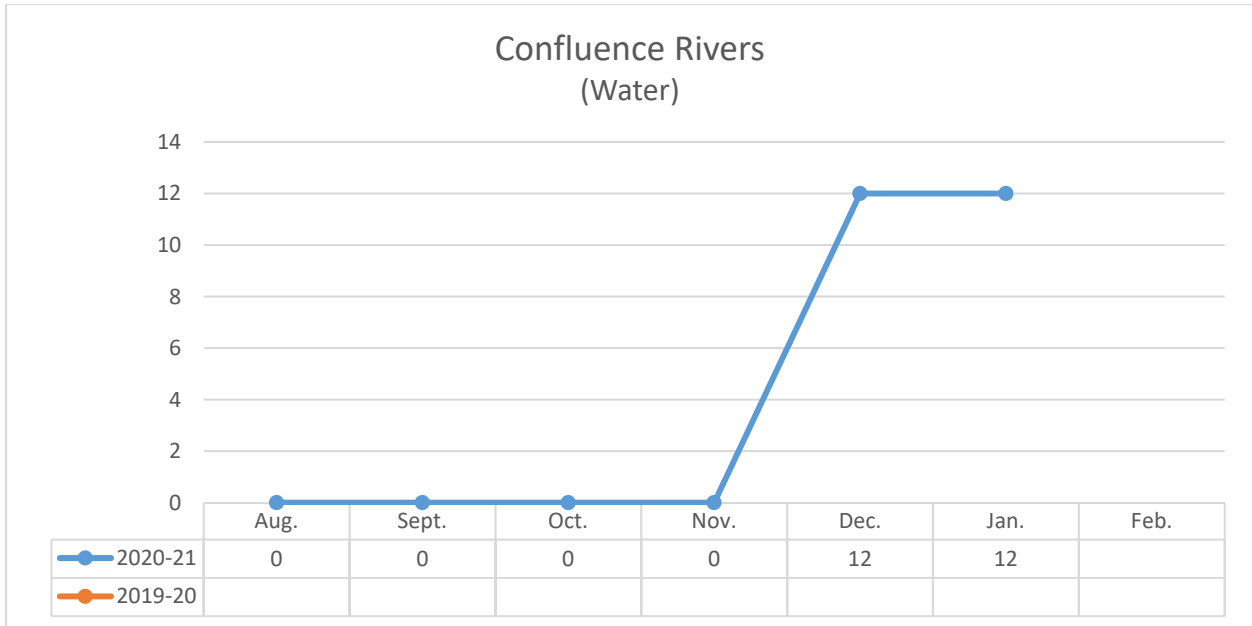
The previous data indicates there were about 33% more Confluence Rivers customers with past-due accounts in January 2021 versus December 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 37 customers with “past-due” accounts during this time 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.

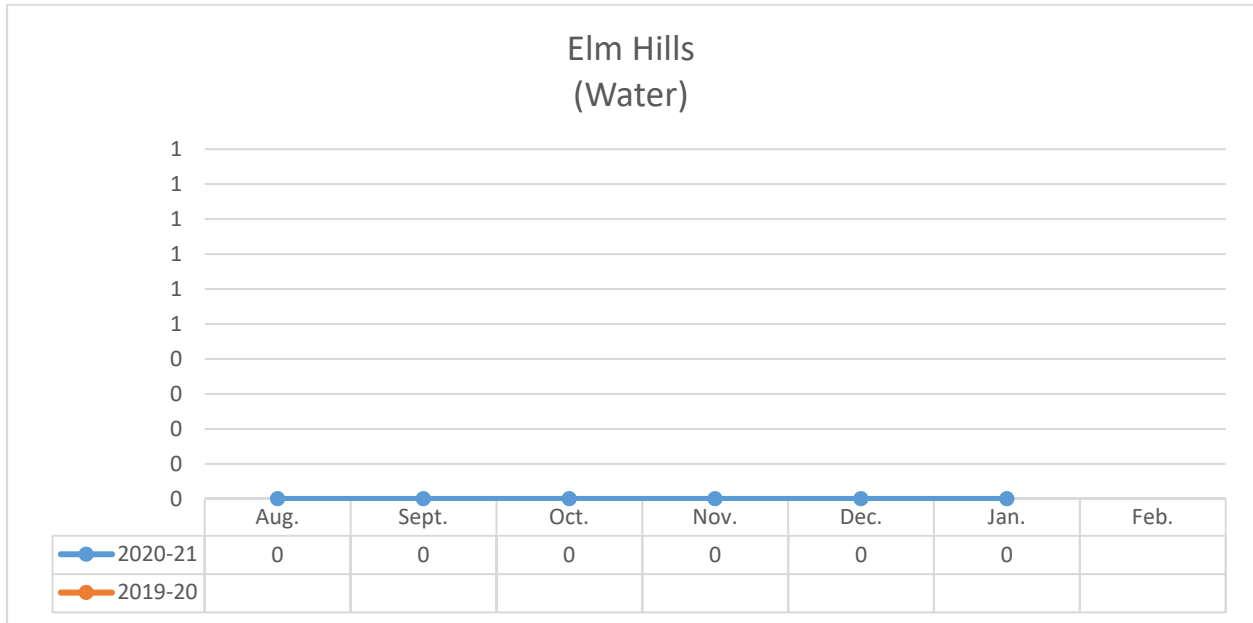
d) The number of customers at each month-end participating in payment plans



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.

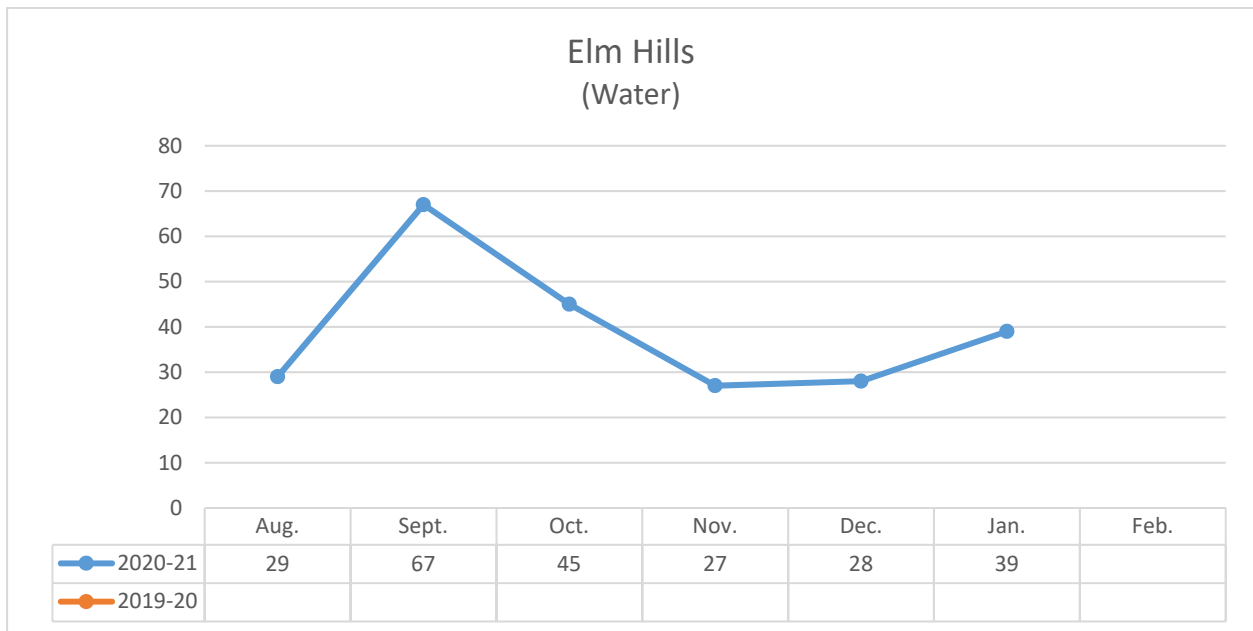
Questions 1 & 3 (Elm Hills - Water)

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



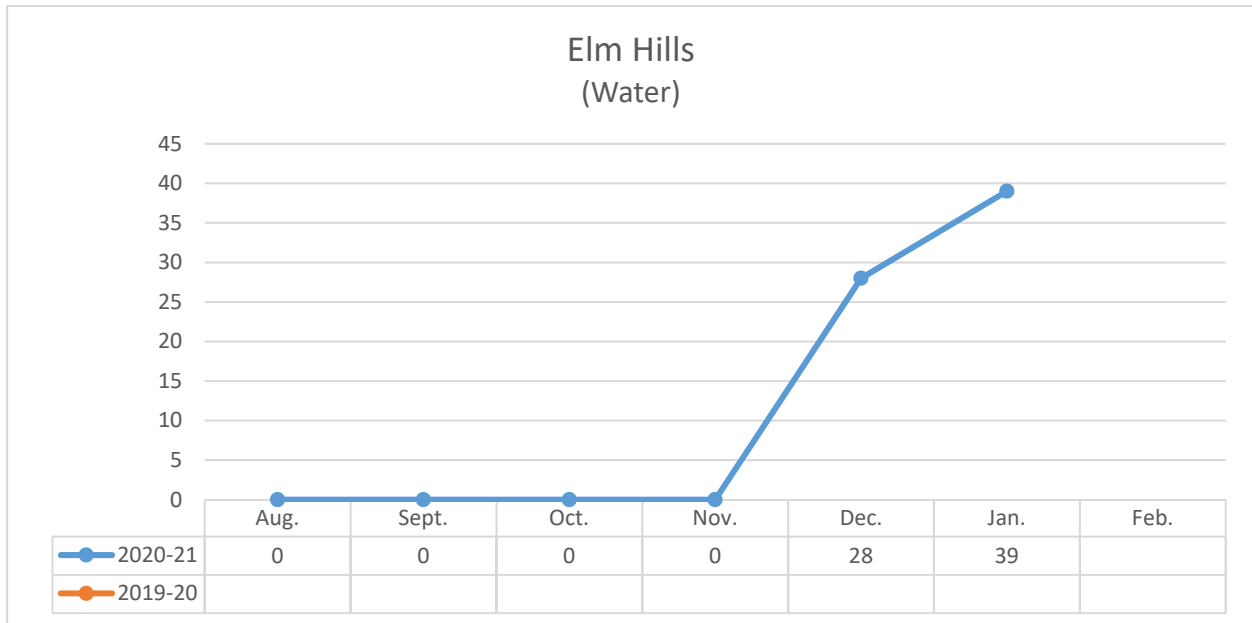
As shown in the previous graph, Elm Hills performed no disconnections in January 2021. No monthly, comparative data was provided for August 2019 to February 2020, although no disconnections were performed during this time period.

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”



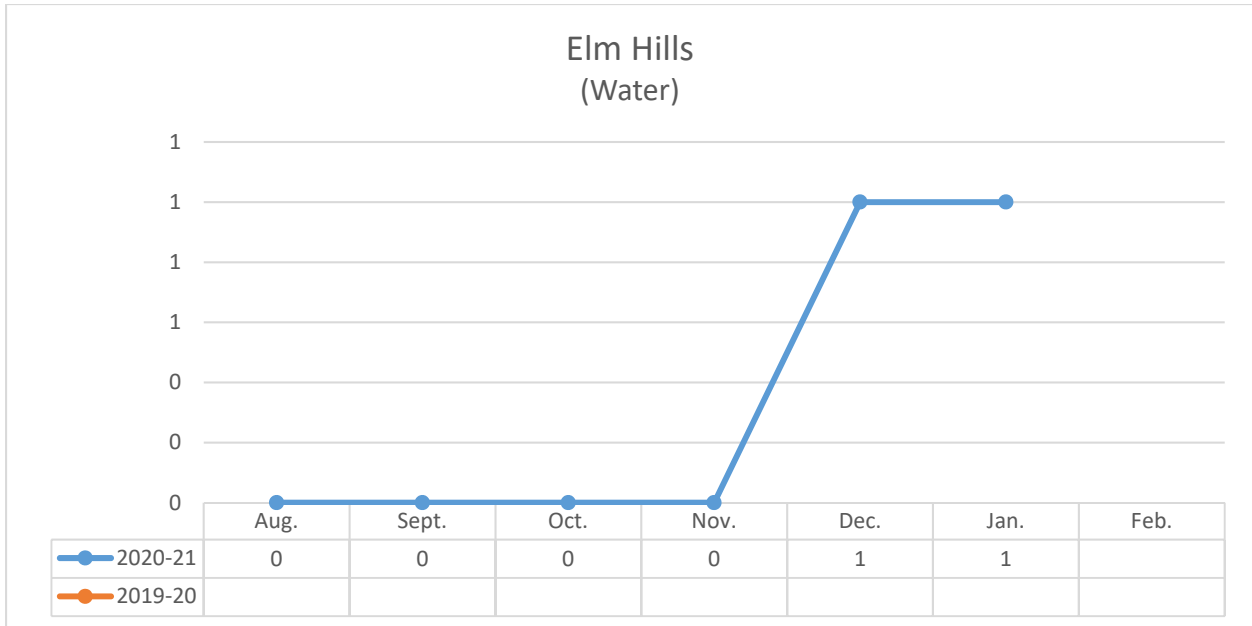
The previous data indicates there were about 39% more Elm Hills customers with past-due accounts in January 2021 versus December 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 1 customer with a “past-due” account during this time period. 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.

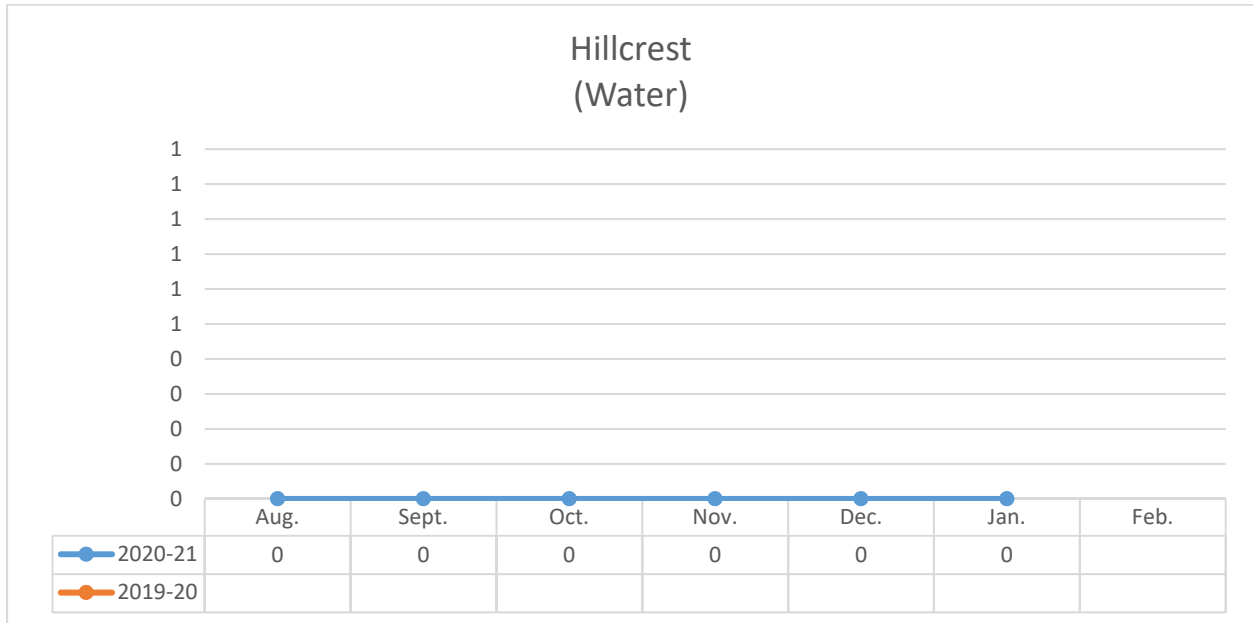
d) The number of customers at each month-end participating in payment plans



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.

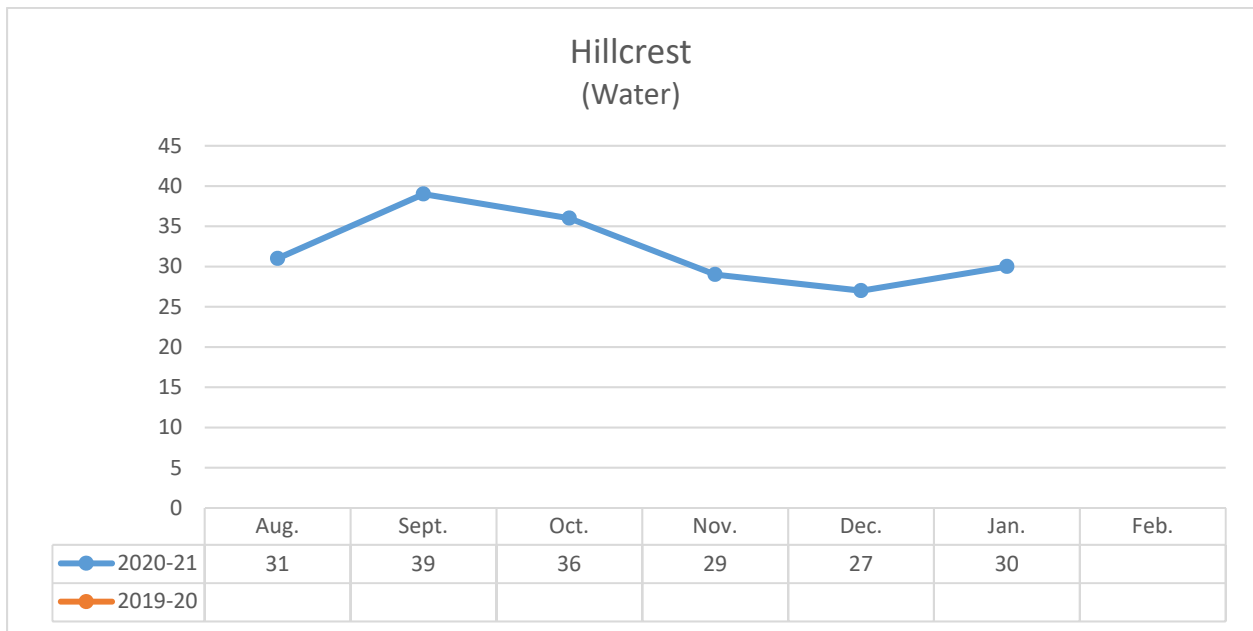
Questions 1 & 3 (Hillcrest - Water)

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



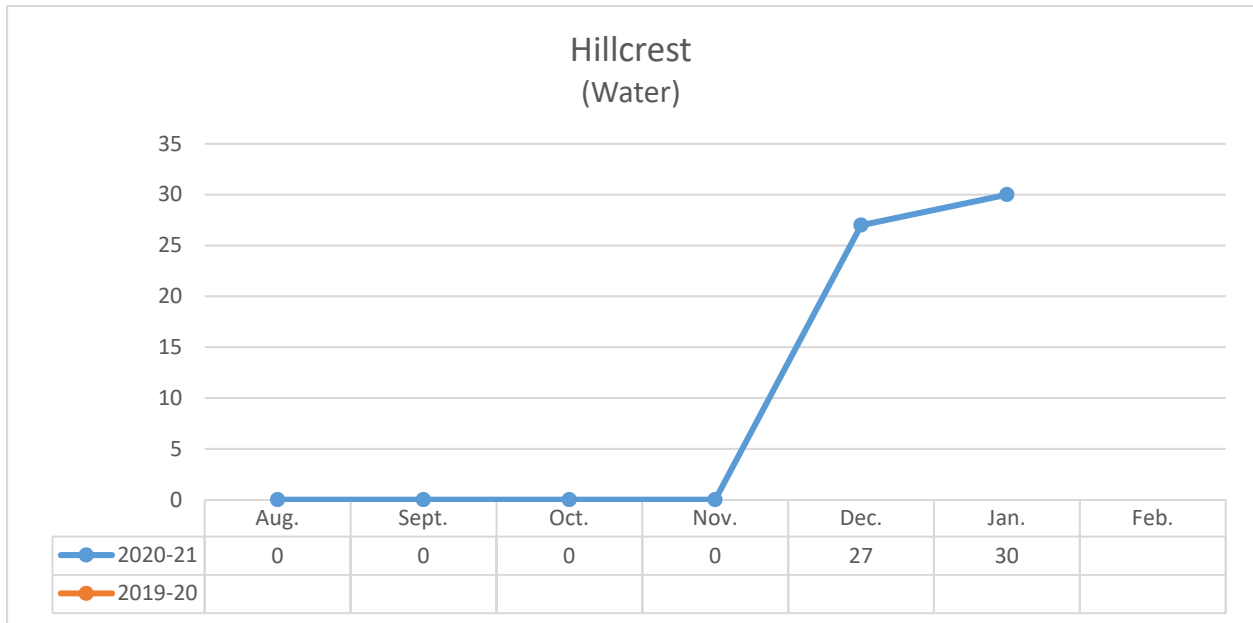
As shown in the previous graph, Hillcrest performed no disconnections in January 2021. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 12 disconnections was performed during this time period.

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”



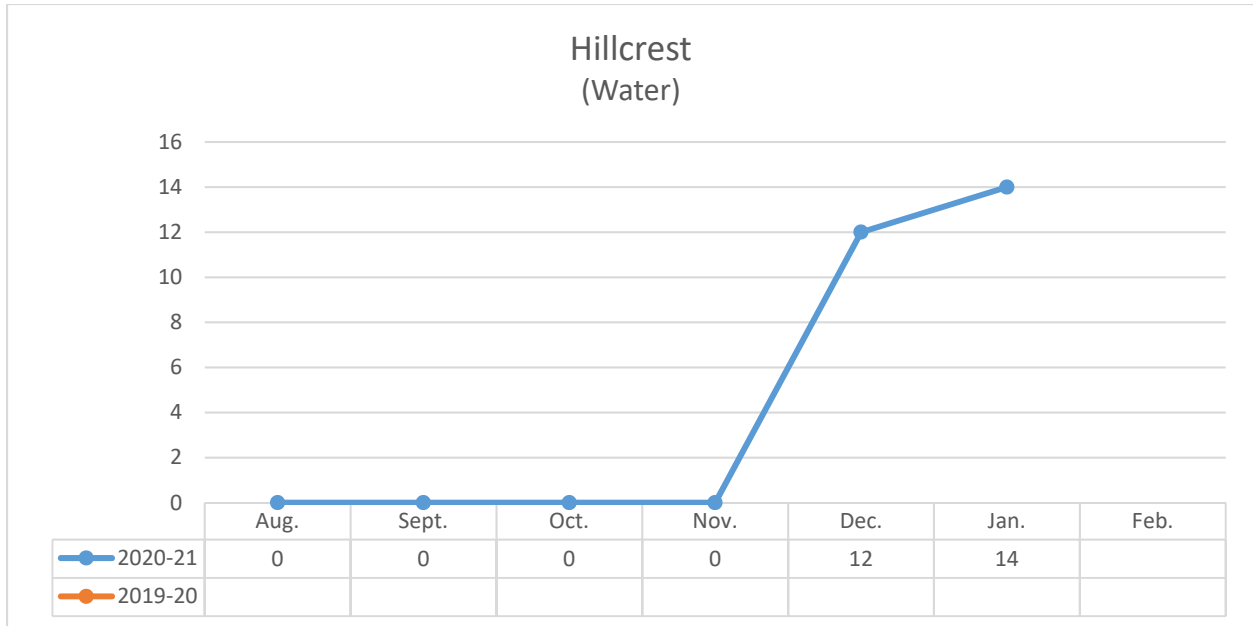
The previous data indicates there were about 11% more Hillcrest customers with past-due accounts in January 2021 versus December 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 16 customers with “past-due” accounts during this time period. 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.

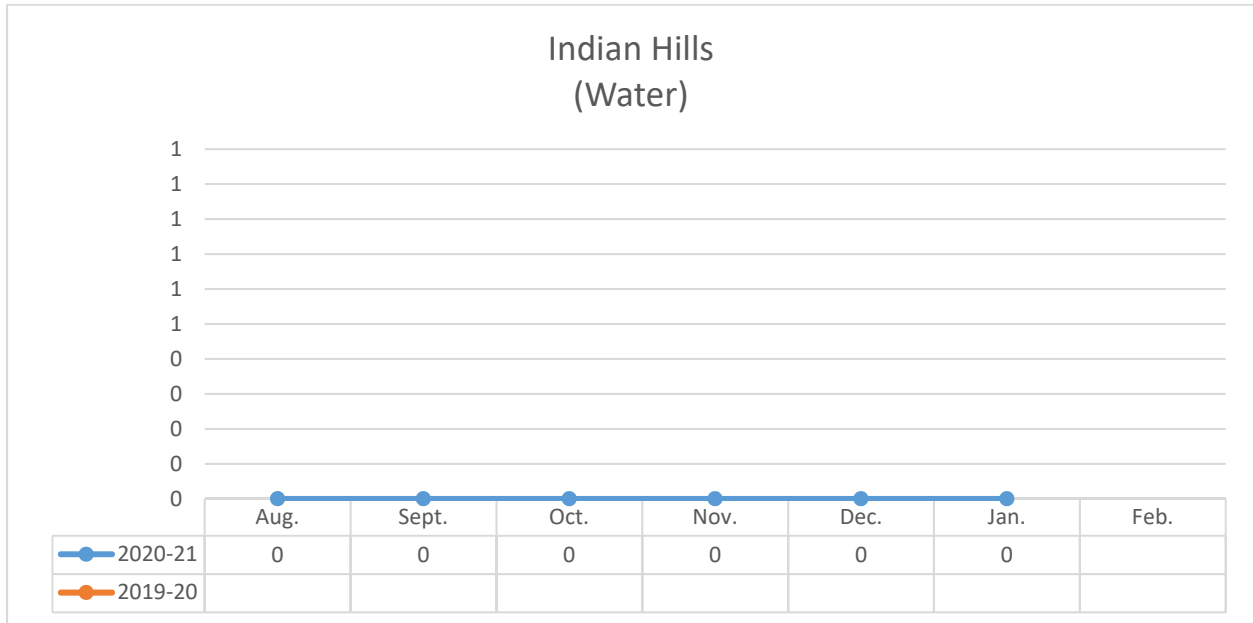
d) The number of customers at each month-end participating in payment plans



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.

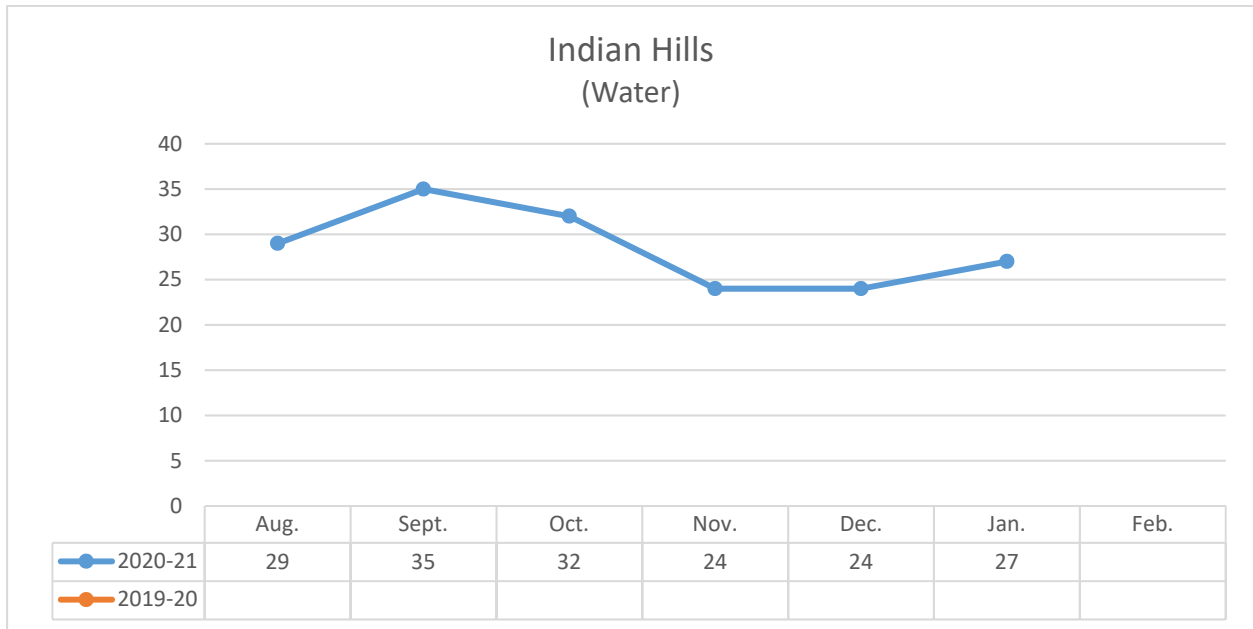
Questions 1 & 3 (Indian Hills - Water)

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



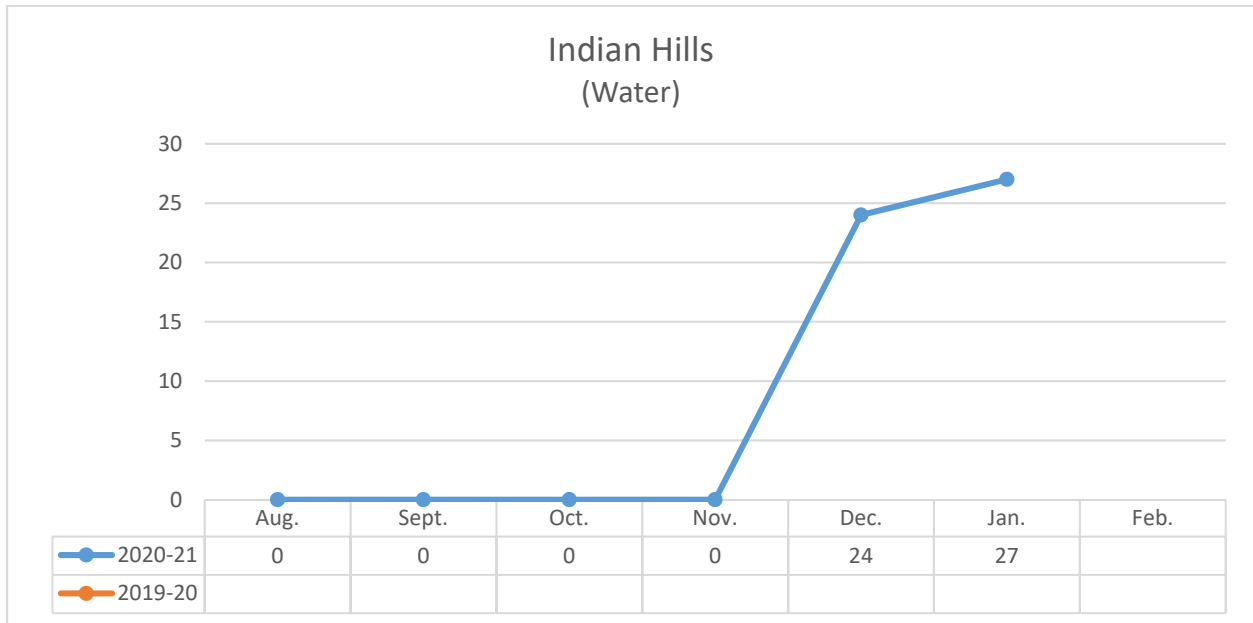
As shown in the previous graph, Indian Hills performed no disconnections in January 2021. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 6 disconnections was performed during this time period.

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”



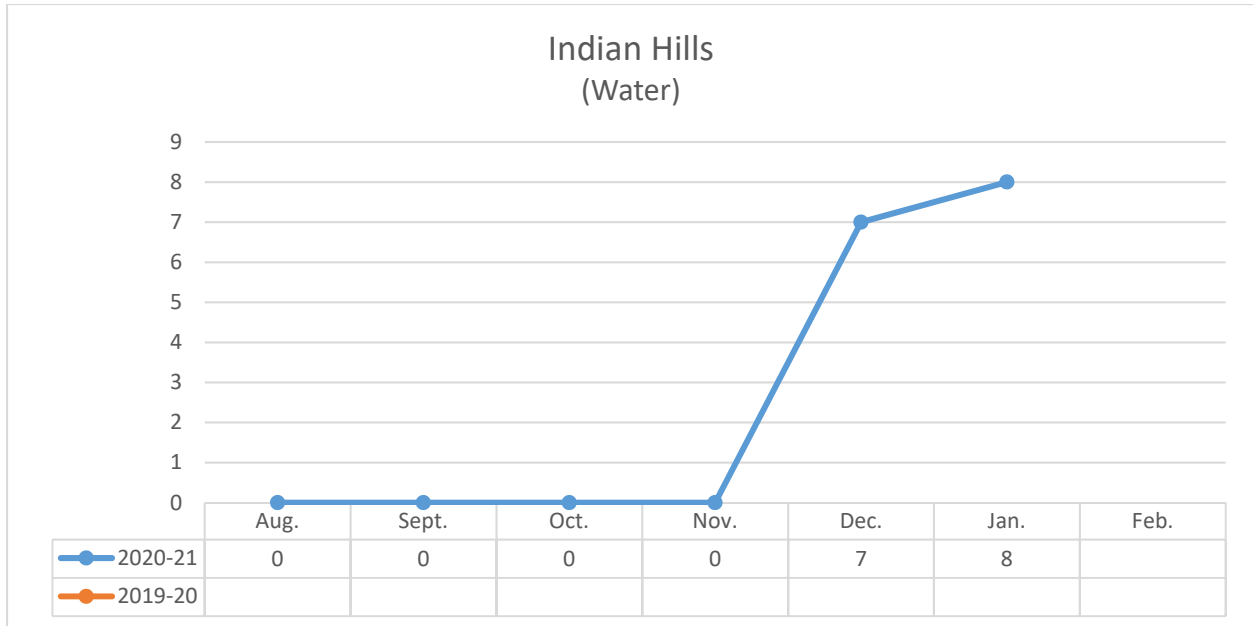
The previous data indicates there were about 13% more Indian Hills customers with past-due accounts in January 2021 versus December 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 11 customers with “past-due” accounts during this time period. 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.

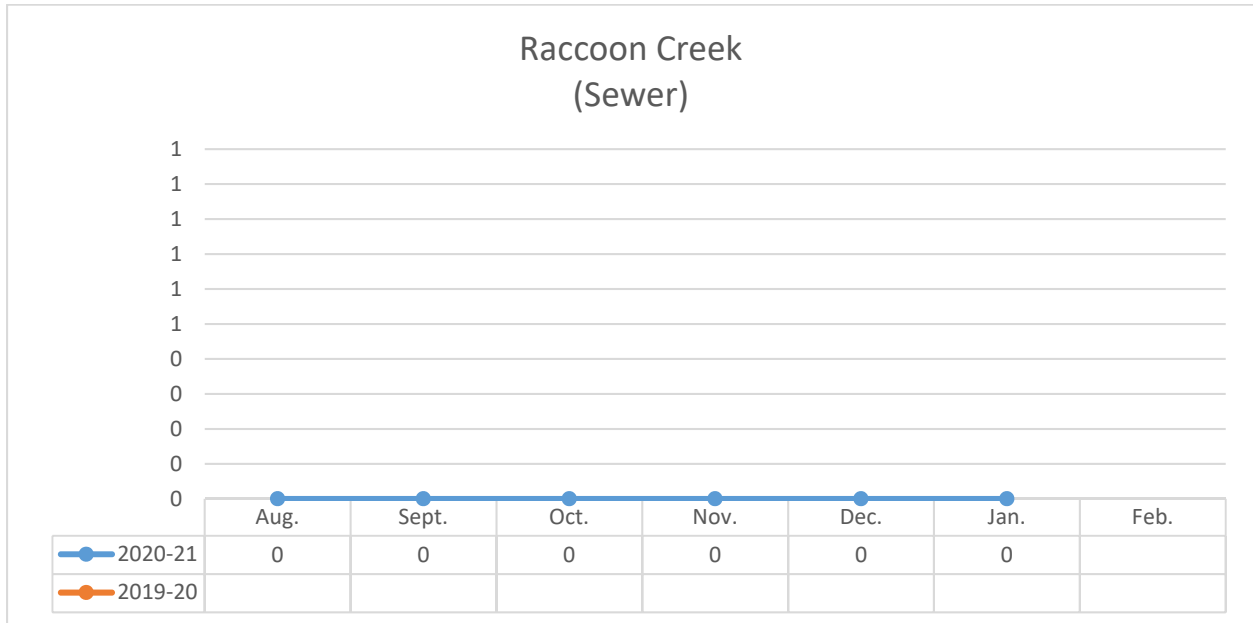
d) The number of customers at each month-end participating in payment plans



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.

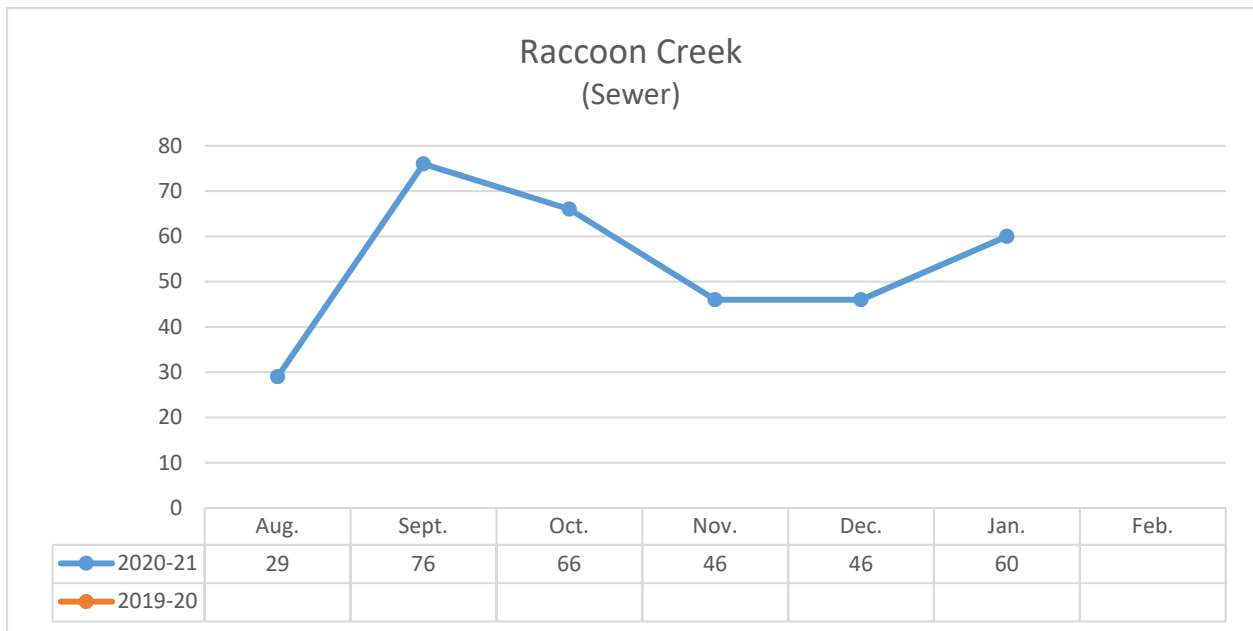
Questions 1 & 3 (Raccoon Creek - Sewer)

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



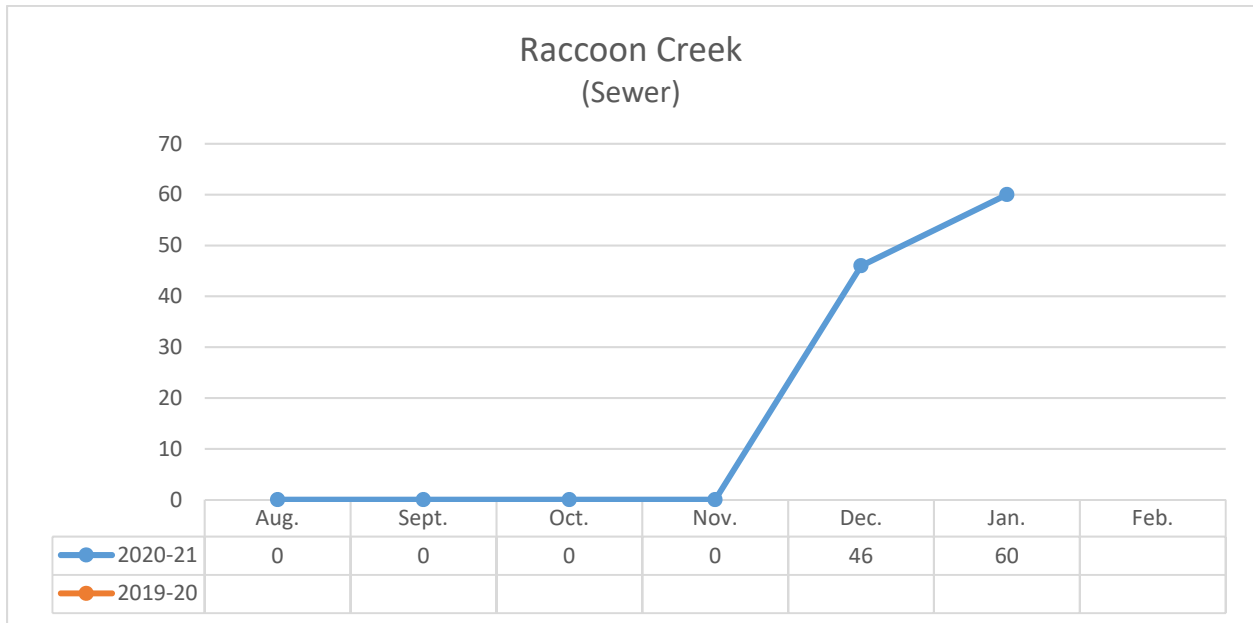
As shown in the previous graph, Raccoon Creek performed no disconnections in January 2021. No monthly, comparative data was provided for August 2019 to February 2020, although a total of one (1) disconnection was performed during this time period.

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”



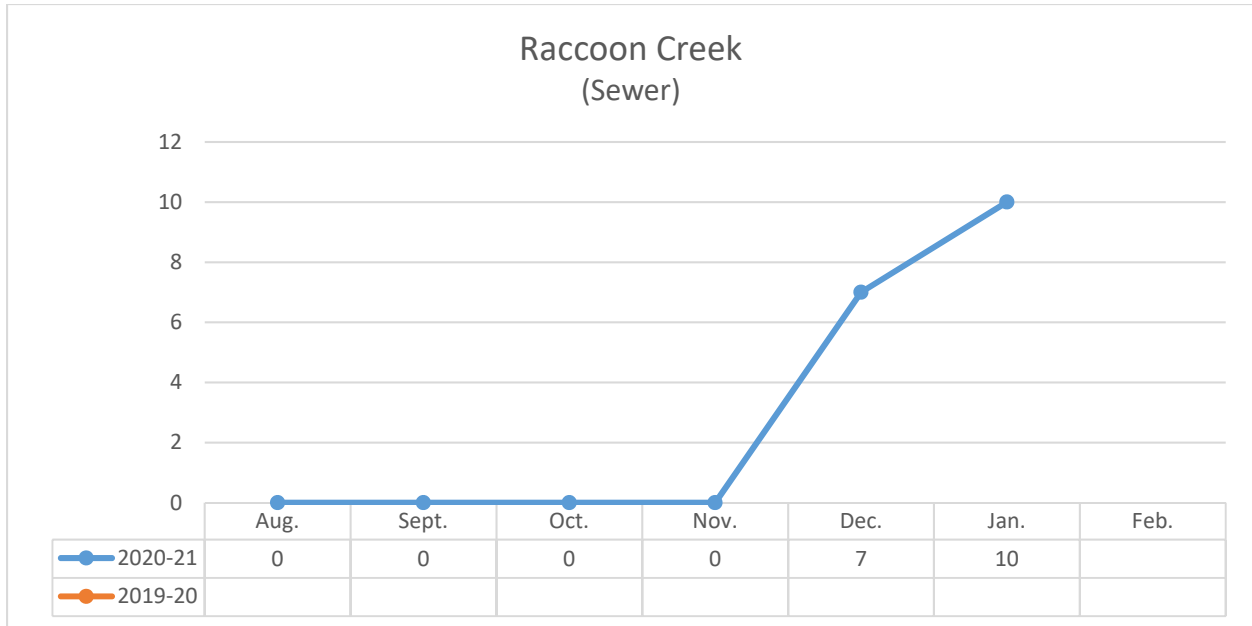
The previous data indicates there were about 30% more Raccoon Creek customers with past-due accounts in January 2021 versus December 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 3 customers with “past-due” accounts during this time period. 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 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 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

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.