

**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, 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. All of the state’s utilities subject to the Commission’s Order provided updated responses to Staff’s DRs for this month’s report. In addition, the Central States Water Resources (“CSWR”) entities provided the missing data pertaining to Staff’s data requests from November and December. 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.

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 22nd day of February, 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

FEBRUARY 22, 2021

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

FILE NO. AW-2020-0356

Questions 1 & 3 (Ameren Missouri – Electric)	4
Questions 1 & 3 (Empire – Electric)	7
Questions 1 & 3 (Evergy Metro – Electric)	10
Questions 1 & 3 (Evergy West – Electric)	13
Questions 1 & 3 (Ameren Missouri – Gas).....	16
Questions 1 & 3 (Spire - Gas)	19
Questions 1 & 3 (Summit - Gas).....	22
Questions 1 & 3 (Empire - Gas).....	25
Questions 1 & 3 (Liberty - MNG - Gas).....	28
Questions 1 & 3 (Liberty - Water).....	31
Questions 1 & 3 (Missouri-American - Water)	34
Questions 1 & 3 (Raytown Water)	37
Questions 1 & 3 (Confluence Rivers - Water).....	41
Questions 1 & 3 (Elm Hills - Water)	45
Questions 1 & 3 (Hillcrest - Water).....	49
Questions 1 & 3 (Indian Hills - Water).....	53
Questions 1 & 3 (Raccoon Creek - Sewer).....	57

Question 260

Ameren Missouri (Electric).....60

Empire (Electric).....61

Evergy Metro (Electric).....61

Evergy West (Electric).....62

Ameren Missouri (Gas)62

Spire (Gas)62

Summit (Gas).....62

Empire (Gas)63

Liberty (MNG - Gas)63

Liberty (Water)63

Missouri-American (Water).....64

Raytown Water (Water).....64

Confluence Rivers (Water).....64

Elm Hills (Water).....64

Hillcrest (Water)65

Indian Hills (Water).....65

Raccoon Creek (Sewer)65

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 fifth such update, incorporating information through the end of January 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 January 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 Company – Water"), and The Raytown Water Company ("Raytown Water").

In addition to the above utilities, the Central States Water Resources ("CSWR") family of water and sewer utilities also responded to the Staff data request with month-end January 2021 data, and their responses are included in this report. The CSWR utilities include: Confluence Rivers Utility Operating Company, Inc. ("Confluence Rivers – Water"), Elm Hills Utility Operating Company, Inc. ("Elm Hills – Water"), Hillcrest Utility Operating Company, Inc. ("Hillcrest – Water"), Indian Hills Utility Operating Company, Inc. ("Indian Hills – Water"), and Raccoon Creek Utility Operating Company, Inc. ("Raccoon Creek – Sewer").

The following 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 January 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 January 2021 compared to December 2020).

Summary of Responses to Questions 1 and 3

Regarding Question 1a and 3a, most individual utilities reported decreases in the number of customer disconnections in January 2021 compared to the amount from January 2020, and in the number of disconnections for January 2021 compared to the previous month, December 2020.

For Question 1b and 3b, there were approximately equal number of utilities reporting increases and decreases in the number of past-due customer accounts in January 2021 compared to the amount from January 2020. However, most utilities reported little change or decreases in the number of past-due accounts in January 2021 compared to the previous month.

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

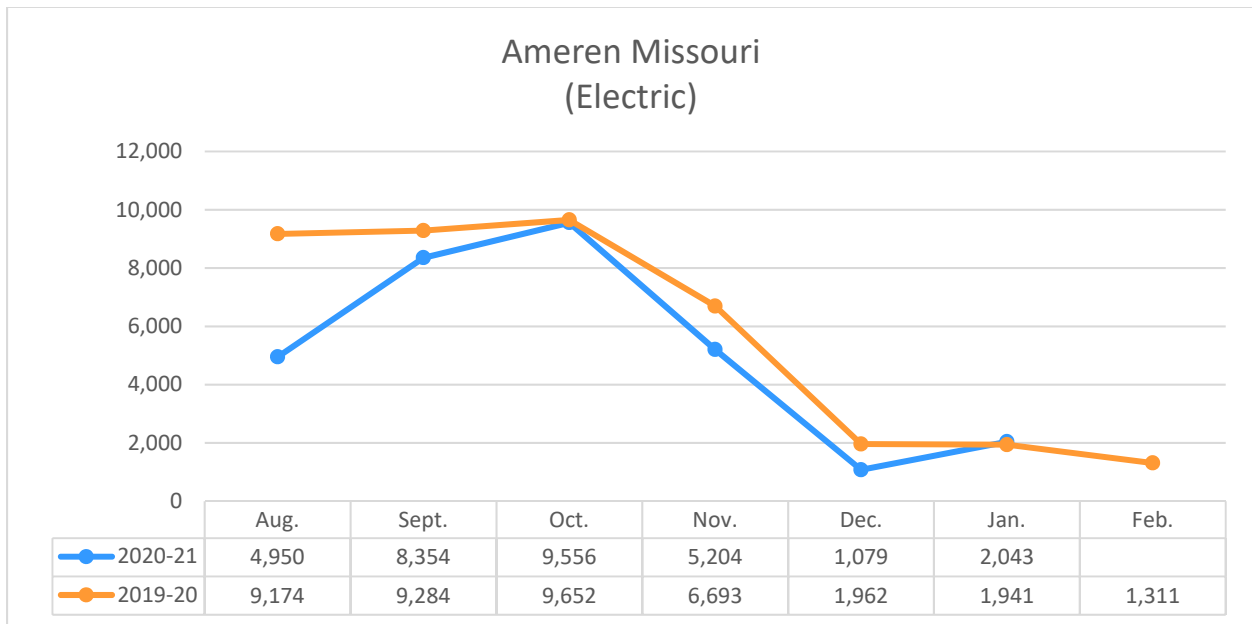
Regarding Question 1d and 3d, almost all utilities reported increases in the number of customers participating in payment plans in January 2021 compared to January 2020, with some of the increases being quite large. However, there were more utilities reporting decreases than increases in the number of customers participating in payment plans in January 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:

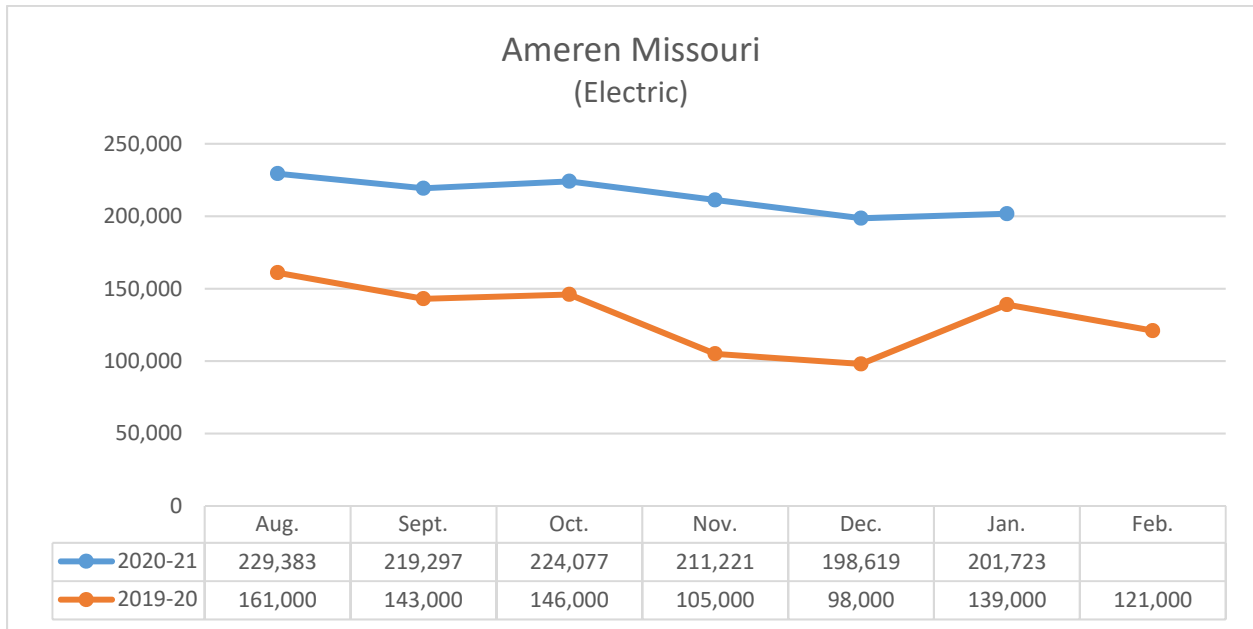
Questions 1 & 3 (Ameren Missouri – Electric)

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



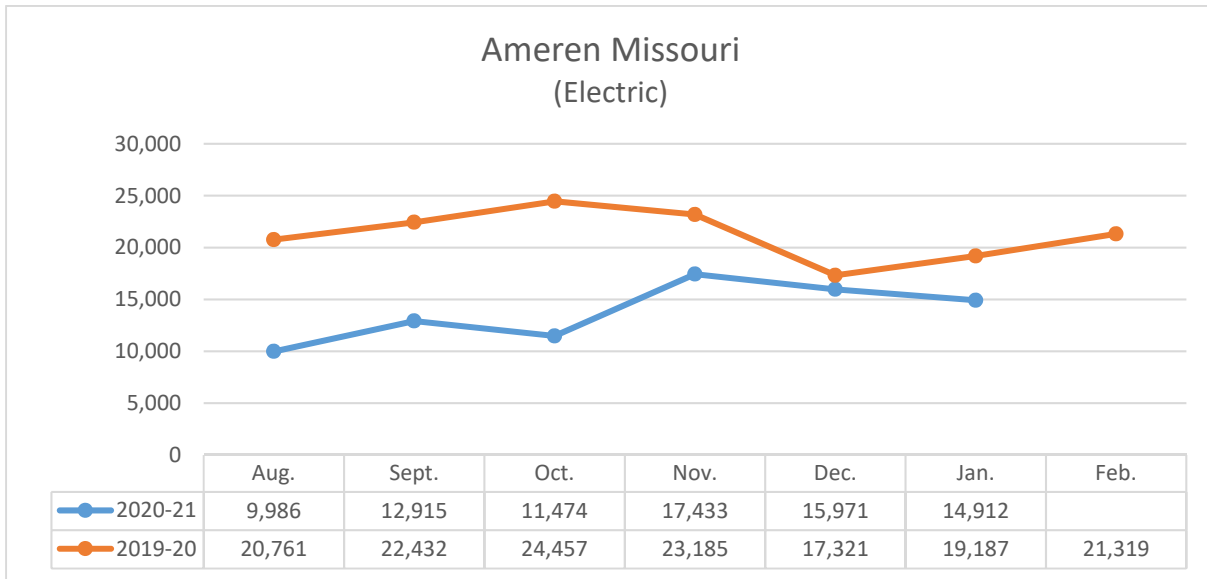
As shown in the previous graph, Ameren Missouri performed approximately 5% more disconnections for non-payment in January 2021 versus January 2020 and about 89% more in January 2021 than in December 2020. The number of actual disconnections by Ameren Missouri in January 2021 was approximately 59% below 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”



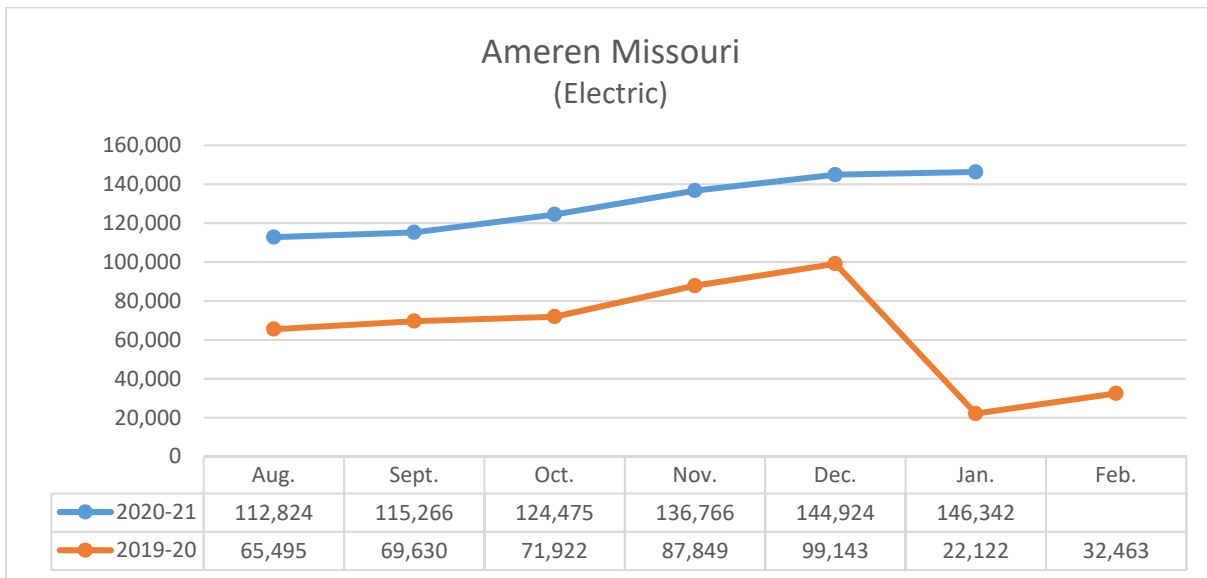
The previous data indicates that there were about 45% more Ameren Missouri customers with past-due accounts in January 2021 versus January 2020 and approximately 2% more in January 2021 than in December 2020. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

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



As shown by Ameren Missouri’s data, for those customers who received a final disconnection notice there were about 22% fewer customers who were not disconnected in January 2021 versus January 2020 and approximately 7% less in January 2021 than in December 2020.

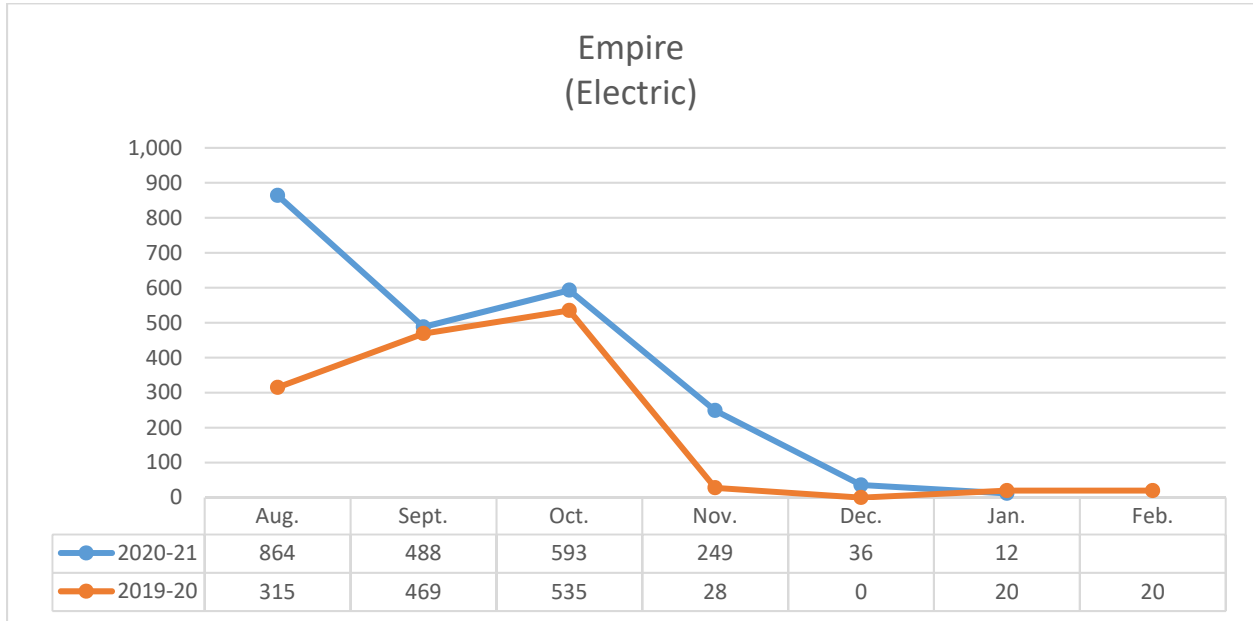
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 562% more Ameren Missouri customers who participated in payment plans in January 2021 versus January 2020 and about 1% more in January 2021 than in December 2020.

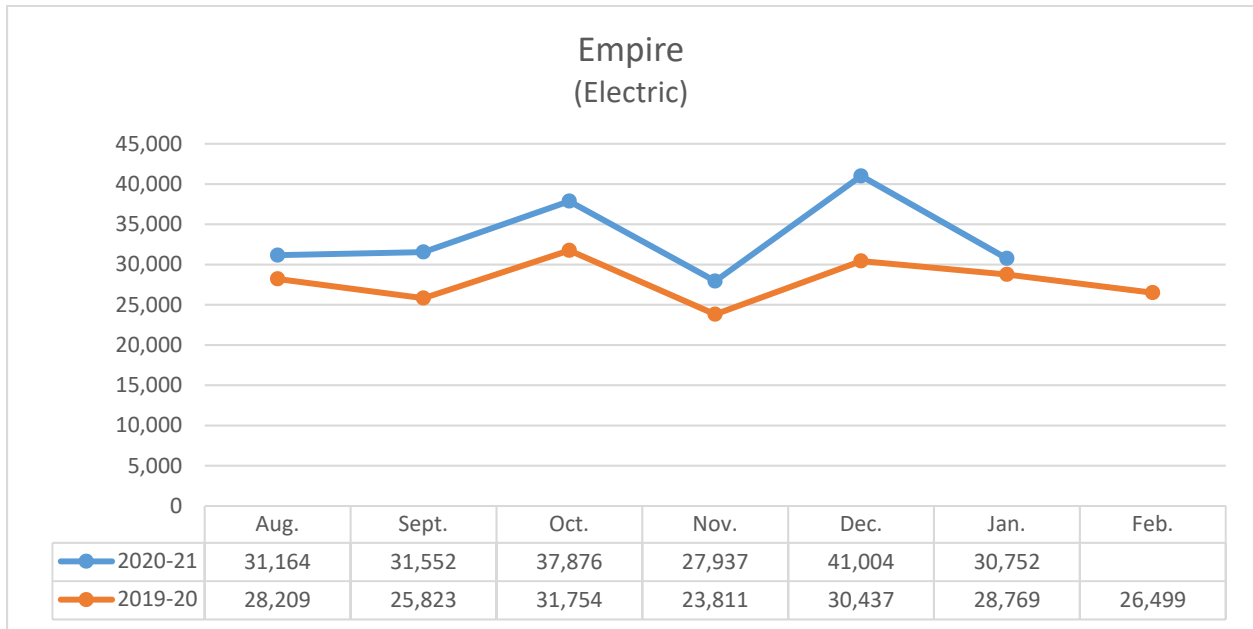
Questions 1 & 3 (Empire – Electric)

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



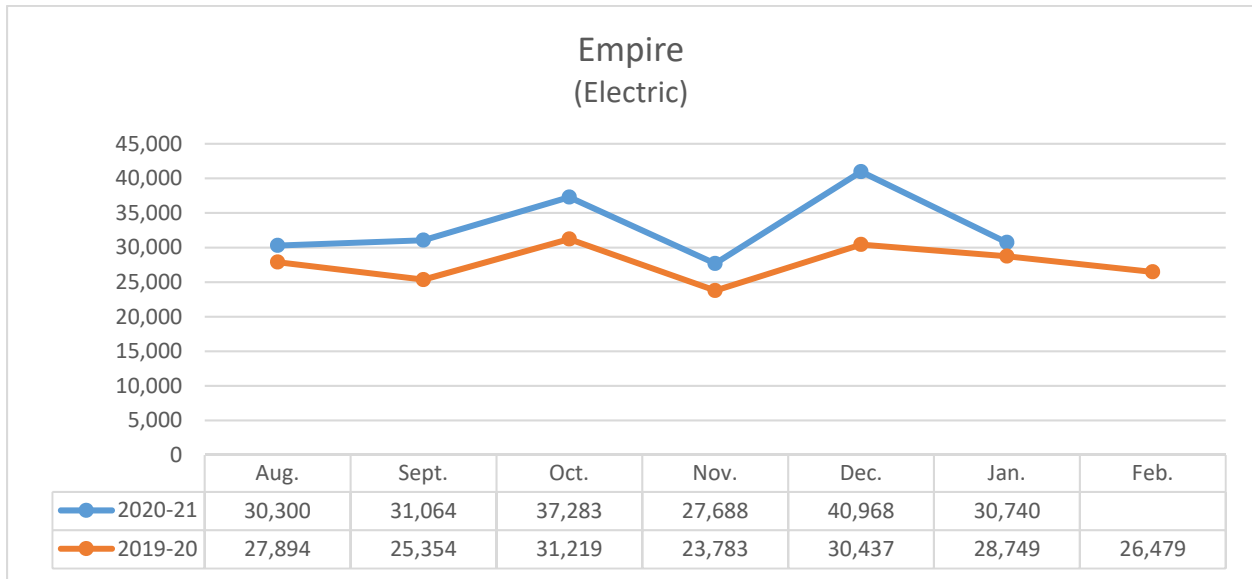
As shown in the previous graph, Empire performed approximately 40% fewer disconnections for non-payment in January 2021 versus January 2020 and about 67% fewer in January 2021 than in December 2020. The number of actual disconnections by Empire in January 2021 was approximately 76% below the number projected 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”



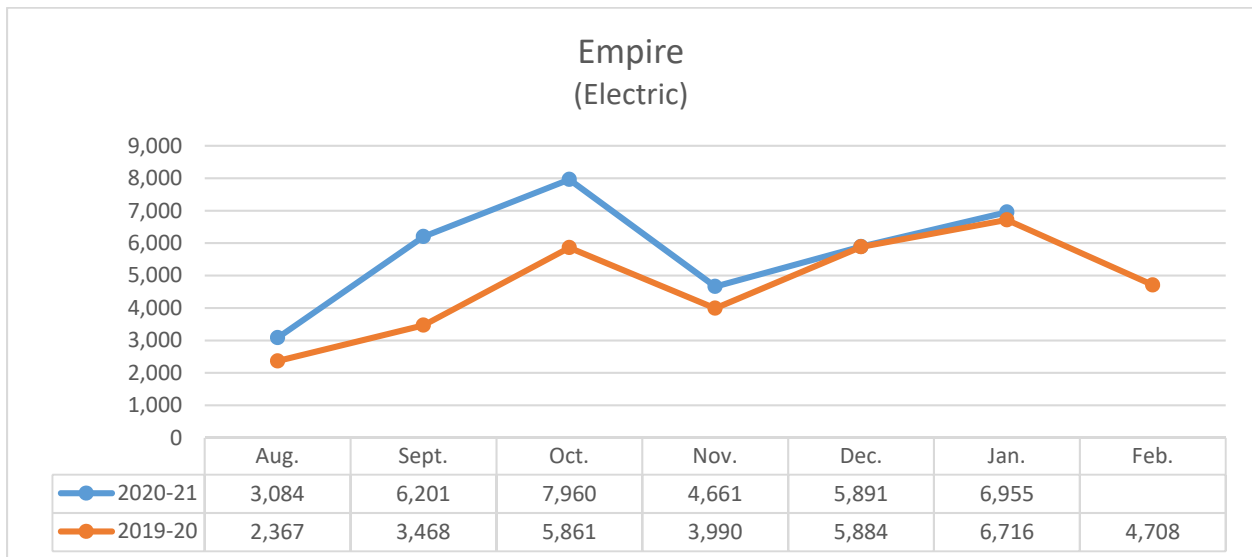
The previous data indicates that there were about 7% more Empire customers with past-due accounts in January 2021 versus January 2020 and approximately 25% fewer in January 2021 than in December 2020. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement due date.

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



As shown by Empire’s data, for those customers who received a final disconnection notice there were about 7% more customers who were not disconnected in January 2021 versus January 2020 and approximately 25% fewer in January 2021 than in December 2020.

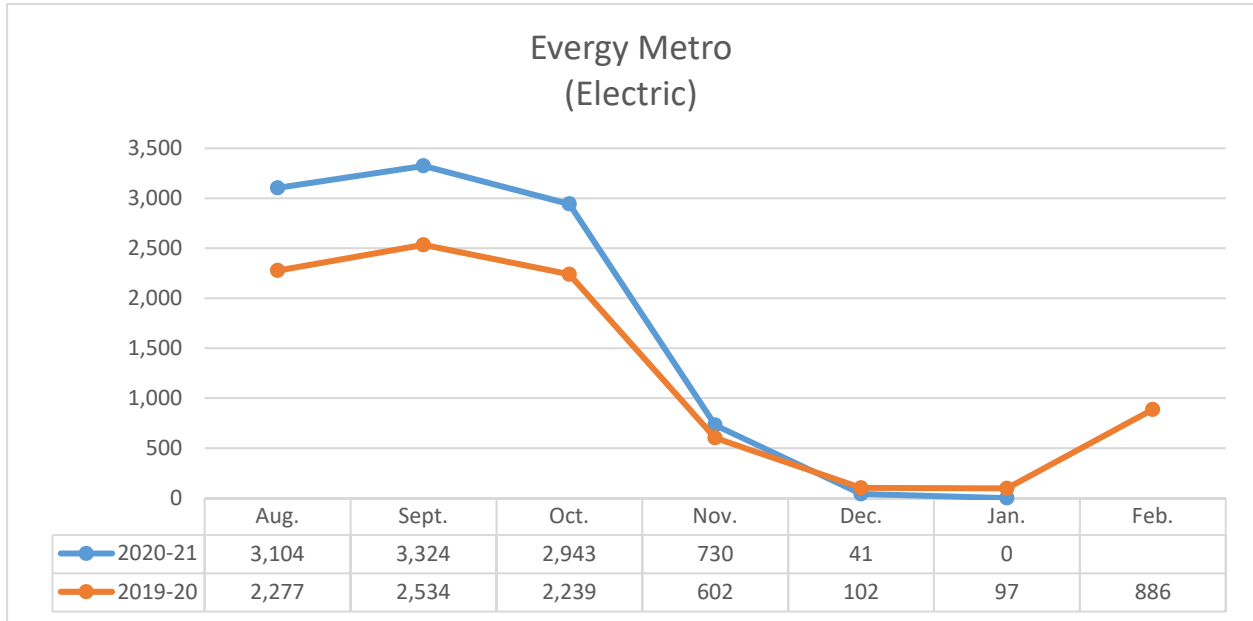
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 4% more Empire customers who participated in payment plans in January 2021 versus January 2020 and about 18% more in January 2021 than in December 2020.

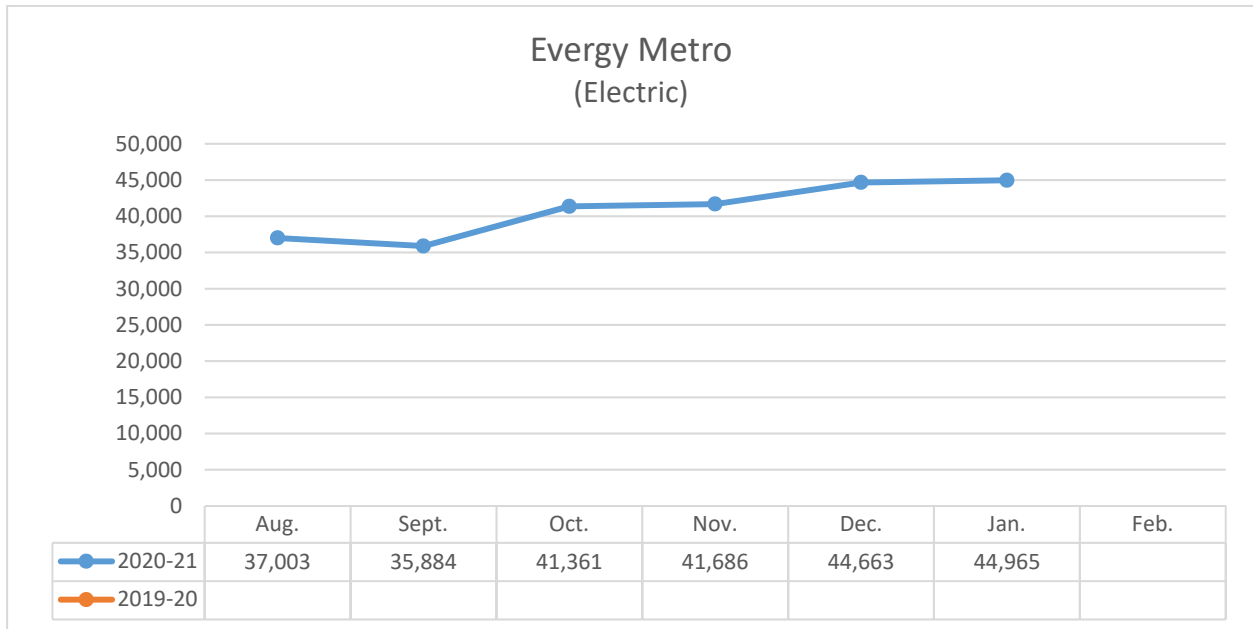
Questions 1 & 3 (Everty Metro – Electric)

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



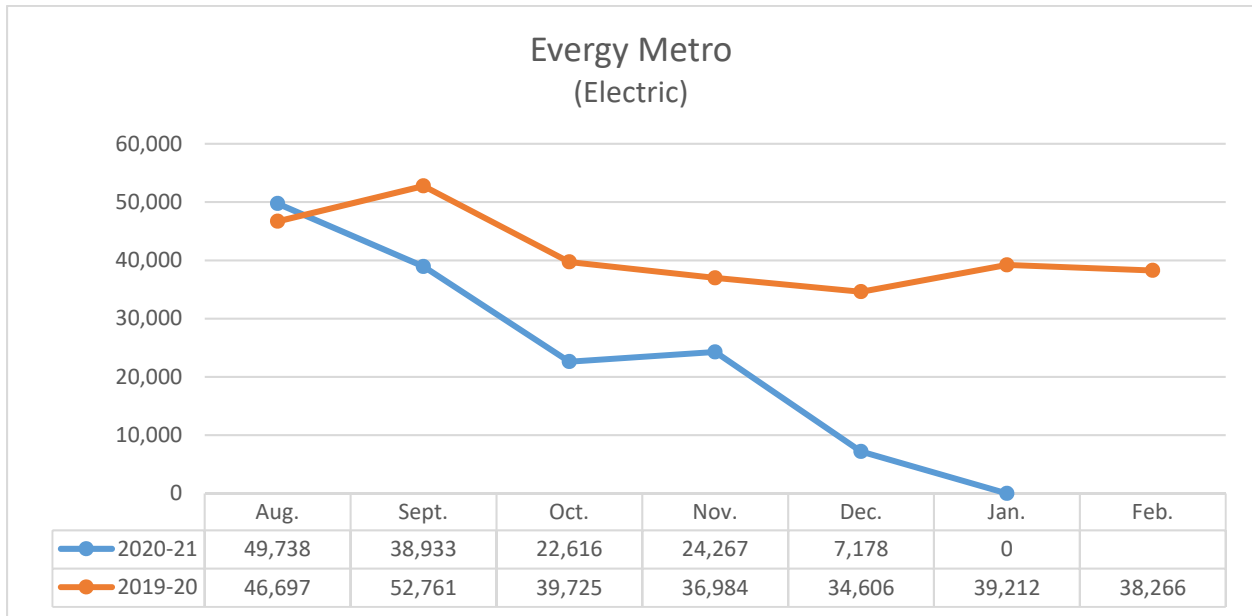
As shown in the previous graph, Everty Metro performed no disconnections for non-payment in January 2021 versus 97 in January 2020 and 41 in December 2020. The number of actual disconnections by Everty Metro in January 2021 was the same as the number projected by Everty Metro for the same month.

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



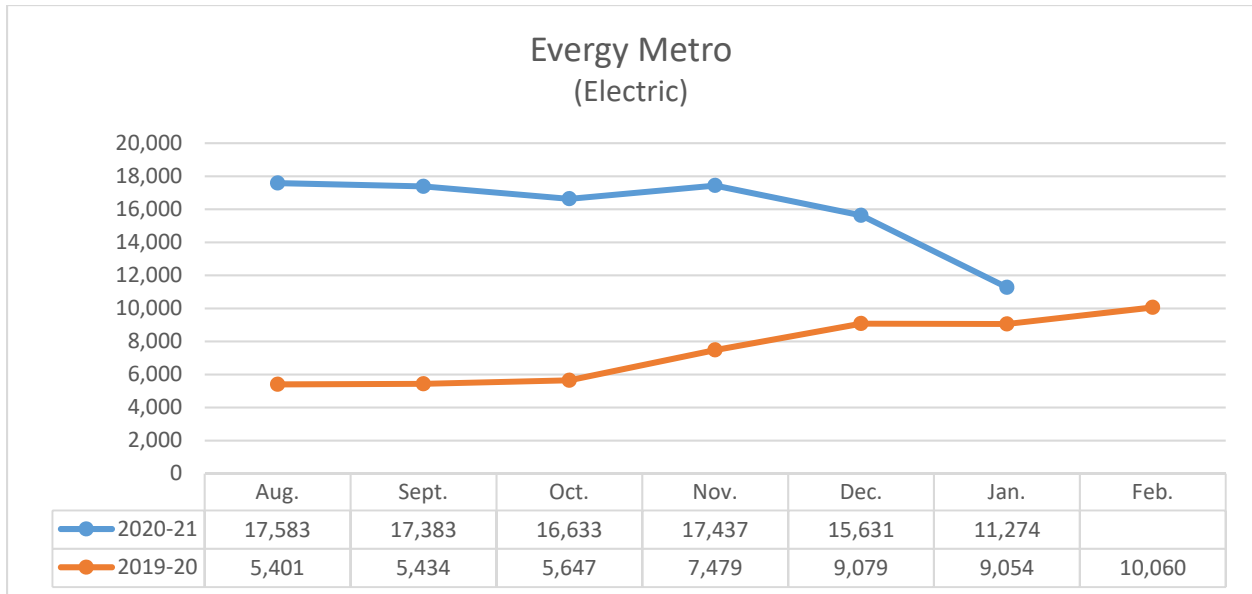
The previous data indicates that there were about 1% more Evergy Metro customers with past-due accounts in January 2021 versus December 2020. Evergy Metro indicated it is unable to provide comparable past-due data for August 2019 to February 2020. Evergy Metro defines past-due accounts as accounts that are more than 30 days in arrears.

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



As shown by Evergy Metro’s data, no customers received a final disconnection notice in January 2021 versus 39,212 in January 2020 and 7,178 in December 2020.

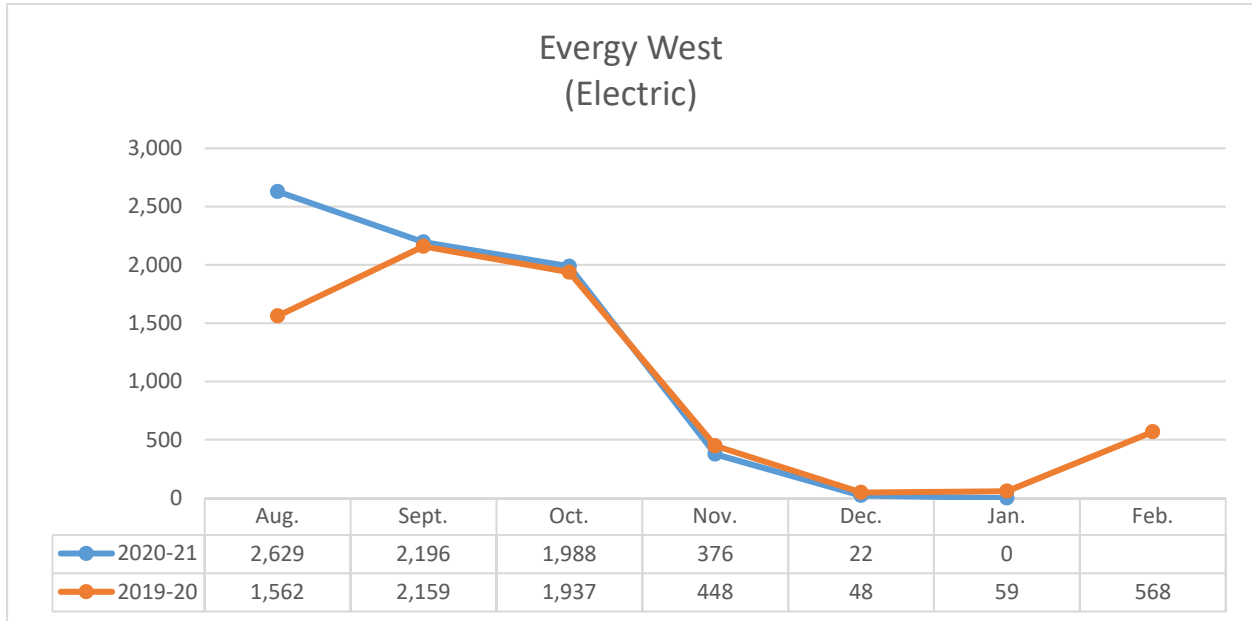
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 25% more Evergy Metro customers who participated in payment plans in January 2021 versus January 2020 and about 28% fewer in January 2021 than in December 2020.

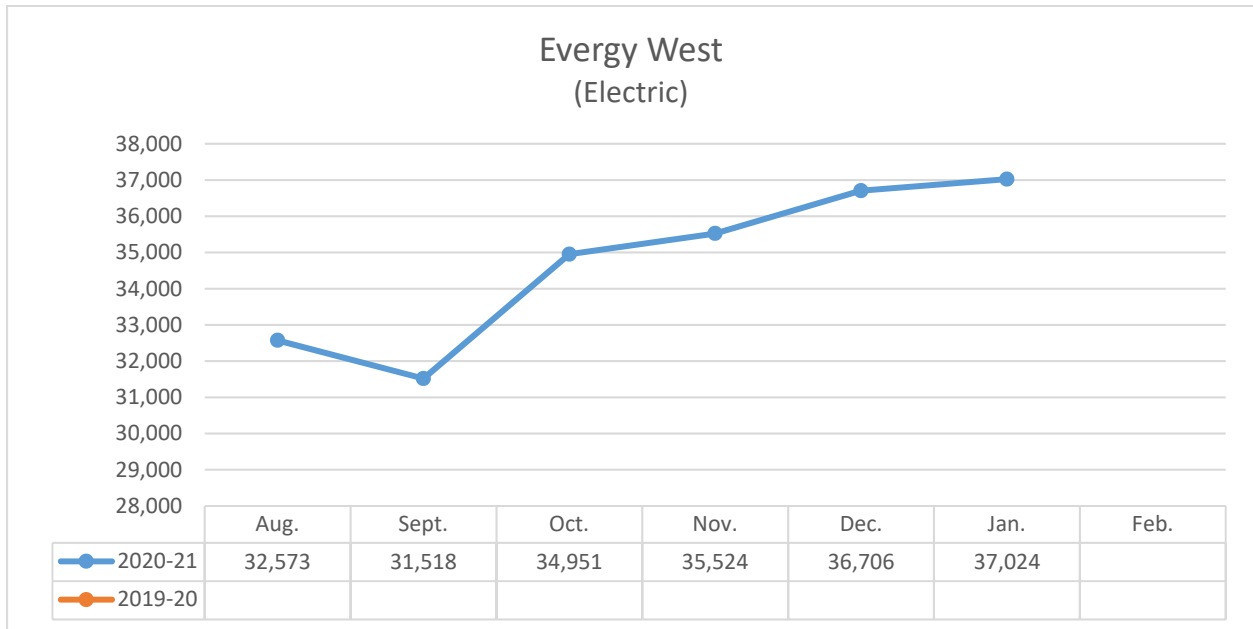
Questions 1 & 3 (Evergy West – Electric)

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



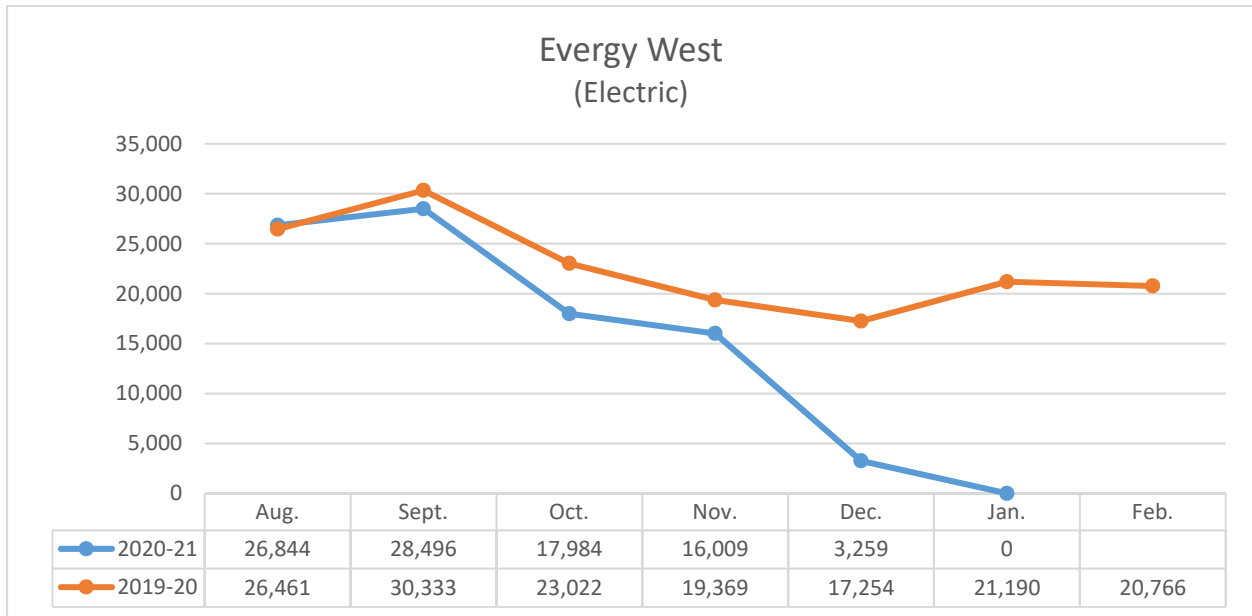
As shown in the previous graph, Evergy West performed no disconnections for non-payment in January 2021 versus 59 in January 2020 and 22 in December 2020. The number of actual disconnections by Evergy West in January 2021 was the same as the number projected by Evergy West for the same month.

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”



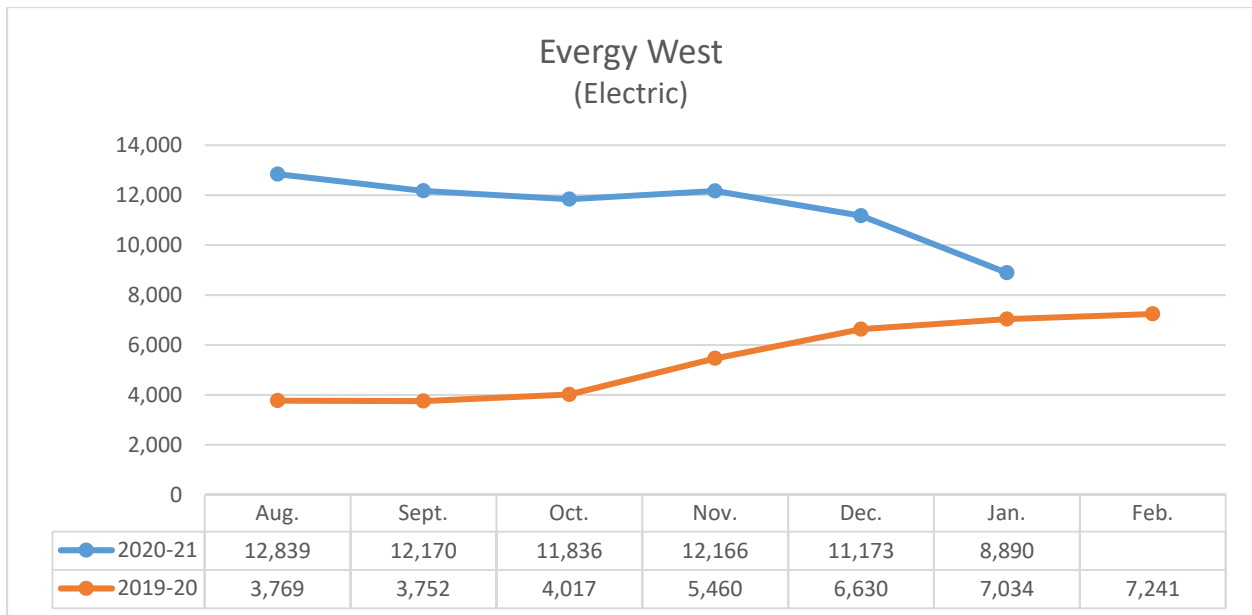
The previous data indicates that there were about 1% more Evergy West customers with past-due accounts in January 2021 versus December 2020. Evergy West indicated it is unable to provide comparable past-due data for August 2019 to February 2020. Evergy West defines past-due accounts as accounts that 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 January 2021 versus 21,190 in January 2020 and 3,259 in December 2020.

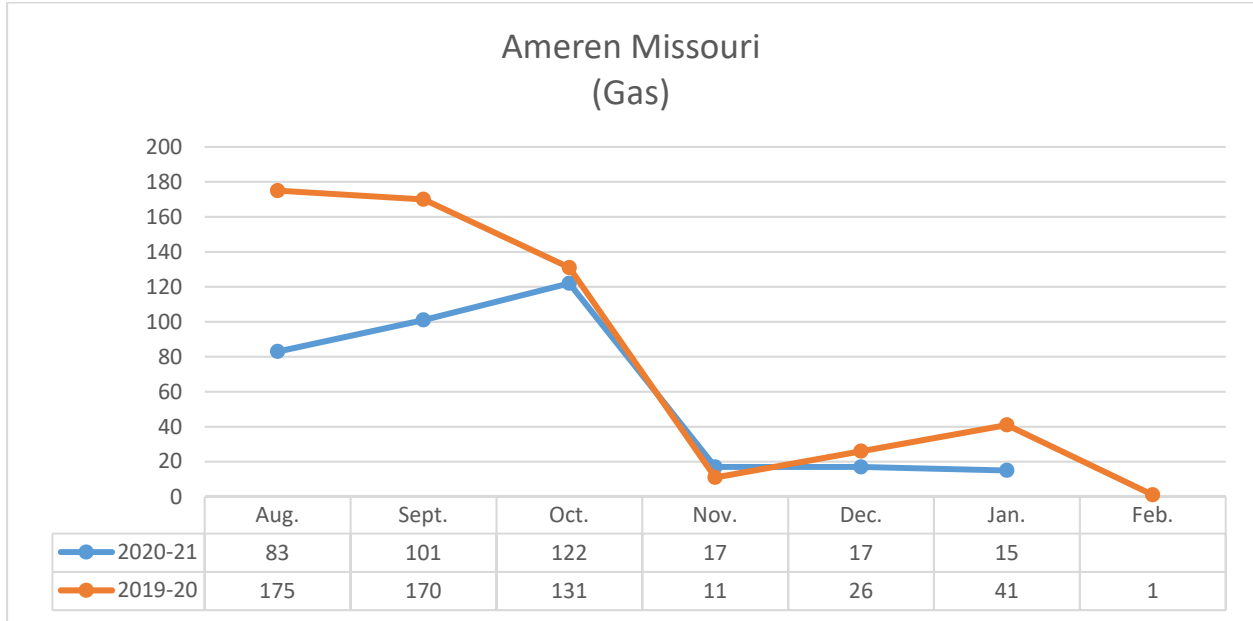
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 26% more Evergy West customers who participated in payment plans in January 2021 versus January 2020 and about 20% fewer in January 2021 than in December 2020.

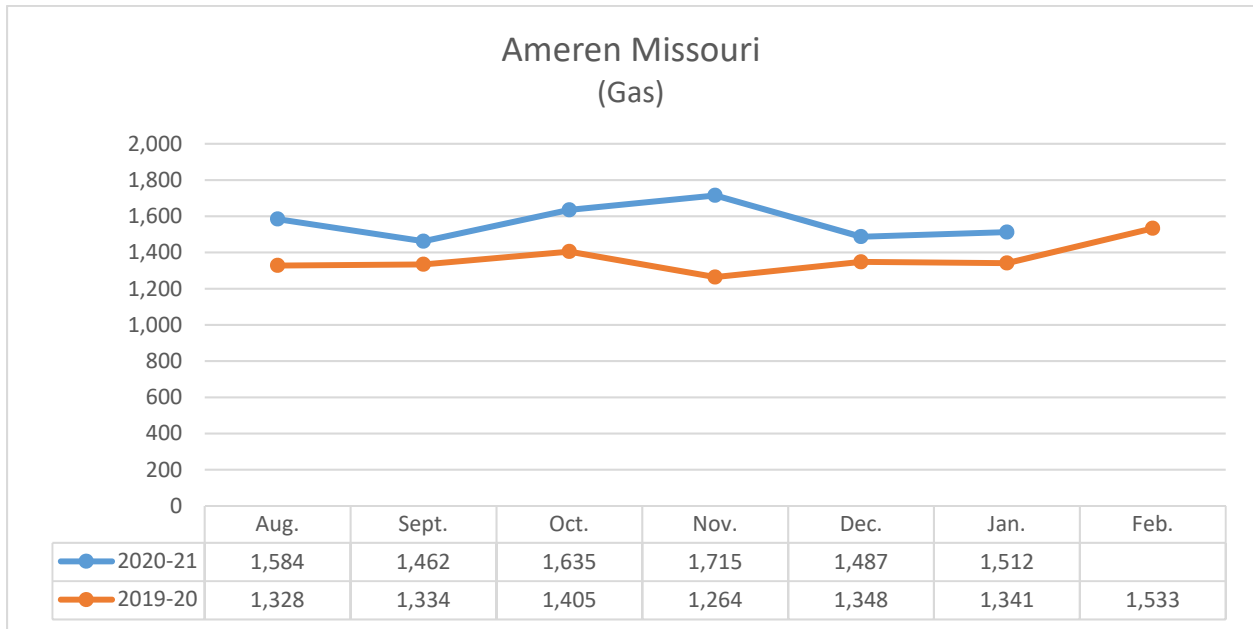
Questions 1 & 3 (Ameren Missouri – Gas)

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



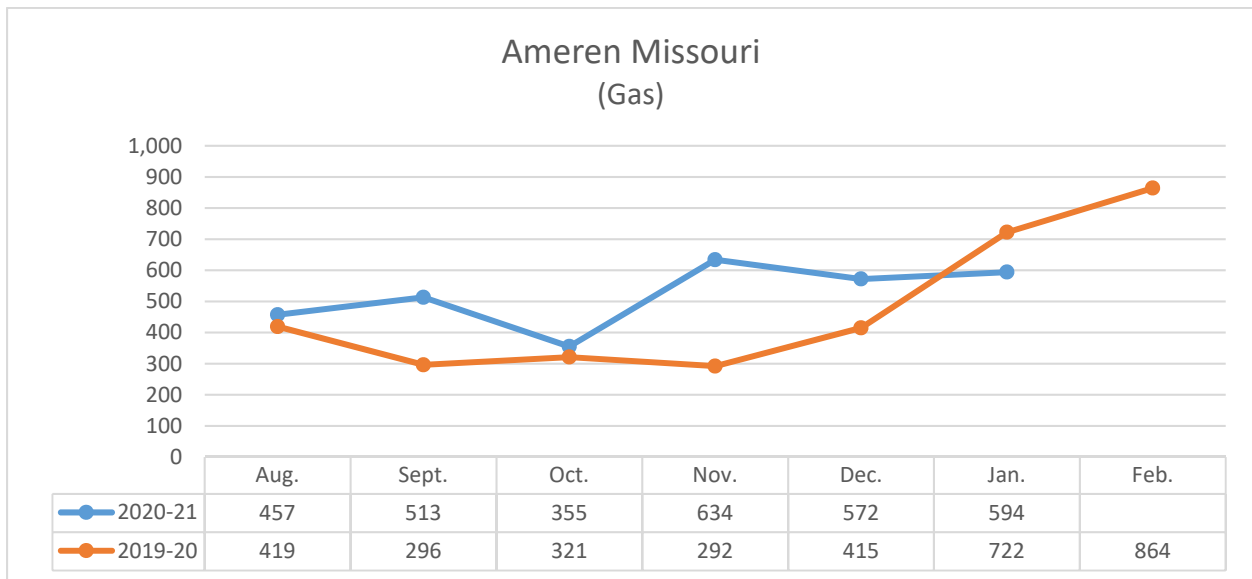
As shown in the previous graph, Ameren Missouri performed approximately 63% fewer disconnections for non-payment in January 2021 versus January 2020 and 12% fewer in January 2021 as in December 2020. The number of actual disconnections by Ameren Missouri in January 2021 was approximately 73% below the 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”



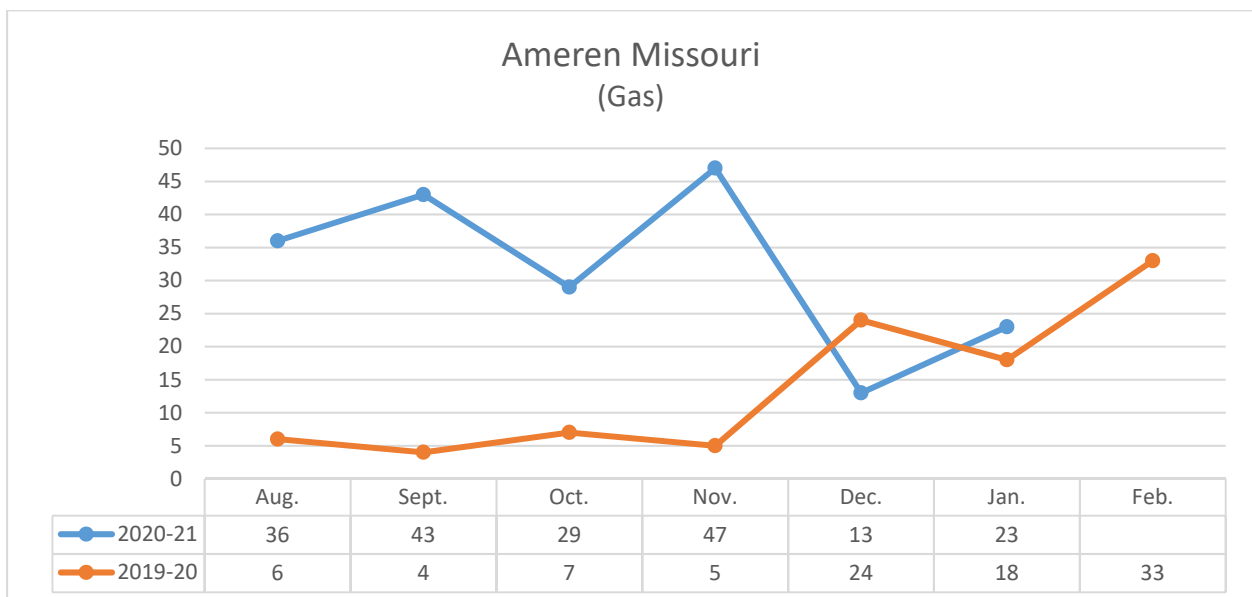
The previous data indicates that there were about 13% more Ameren Missouri customers with past-due accounts in January 2021 versus January 2020 and about 2% more in January 2021 than in December 2020. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

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



As shown by Ameren Missouri’s data, for those customers who received a final disconnection notice there were about 18% fewer customers who were not disconnected in January 2021 versus January 2020 and about 4% more in January 2021 than in December 2020.

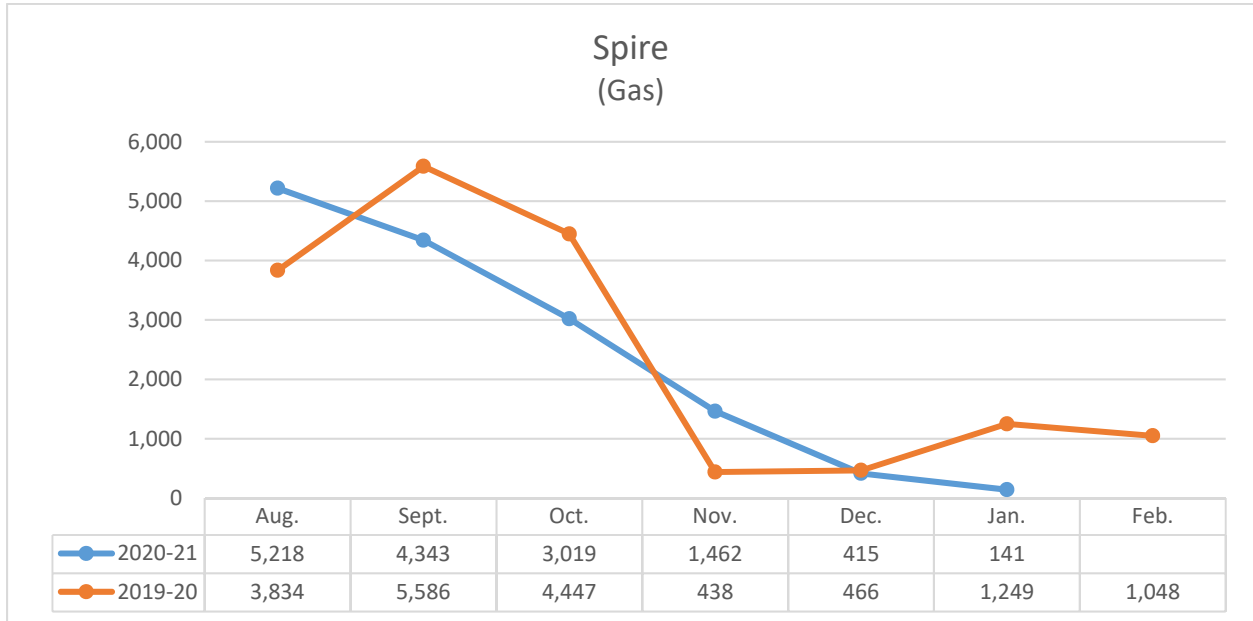
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 28% more Ameren Missouri customers who participated in payment plans in January 2021 versus January 2020 and about 77% more in January 2021 than in December 2020.

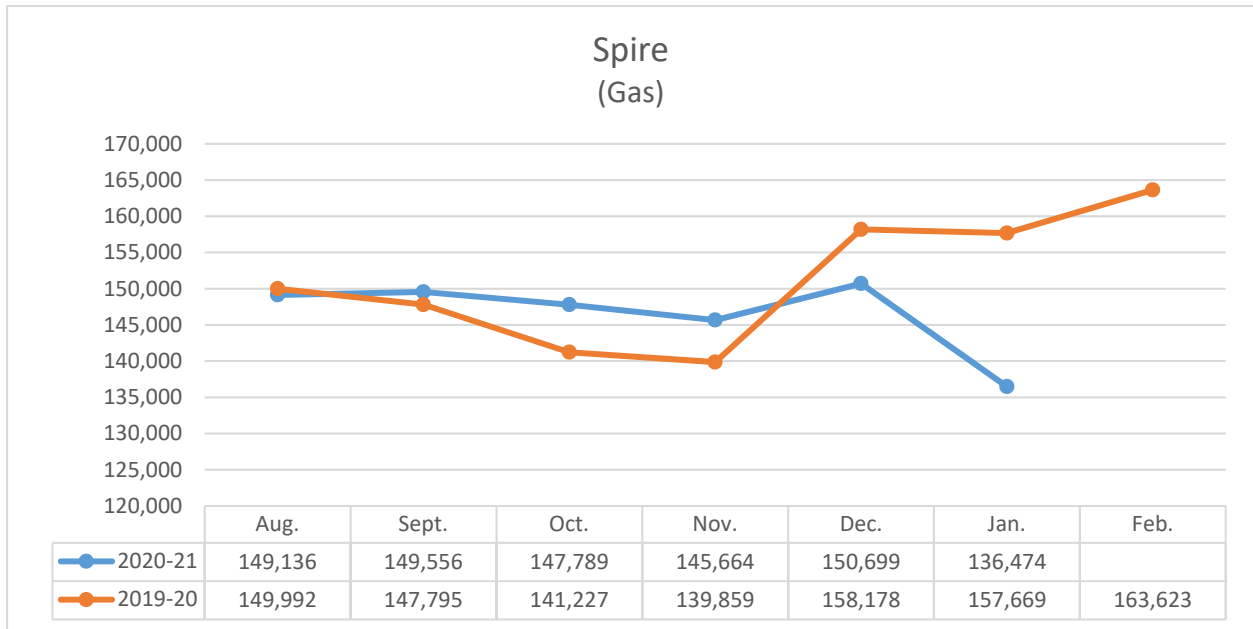
Questions 1 & 3 (Spire - Gas)

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



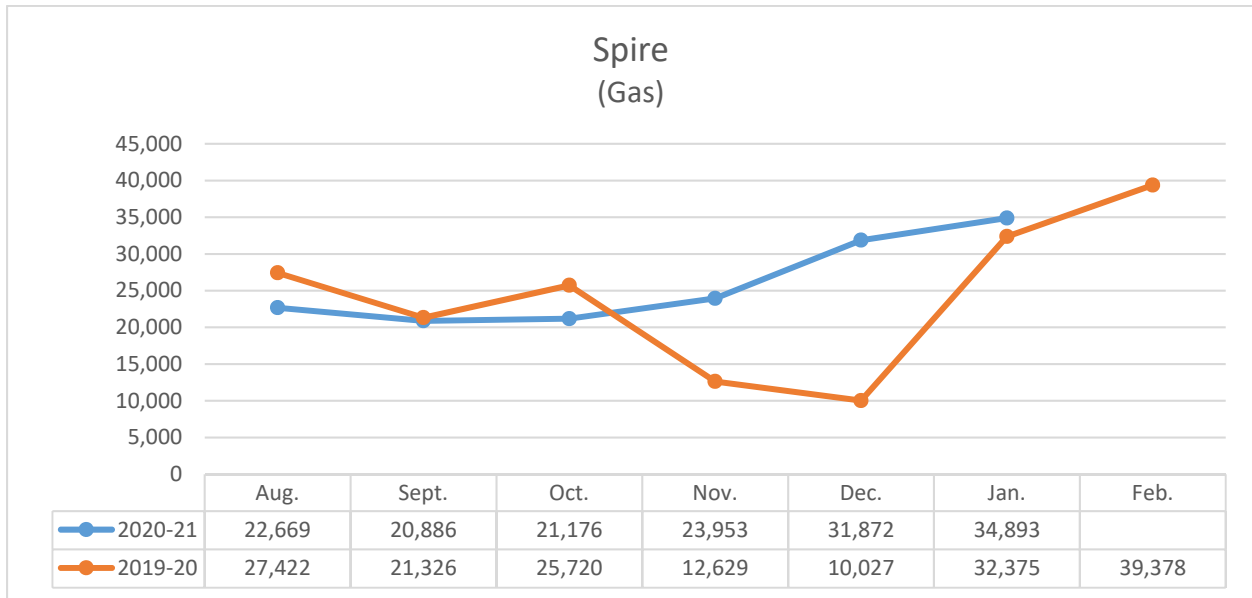
As shown in the previous graph, Spire performed approximately 89% fewer disconnections for non-payment in January 2021 versus January 2020 and approximately 66% less in January 2021 than in December 2020. The number of actual disconnections by Spire in January 2021 was approximately 84% below the number 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”



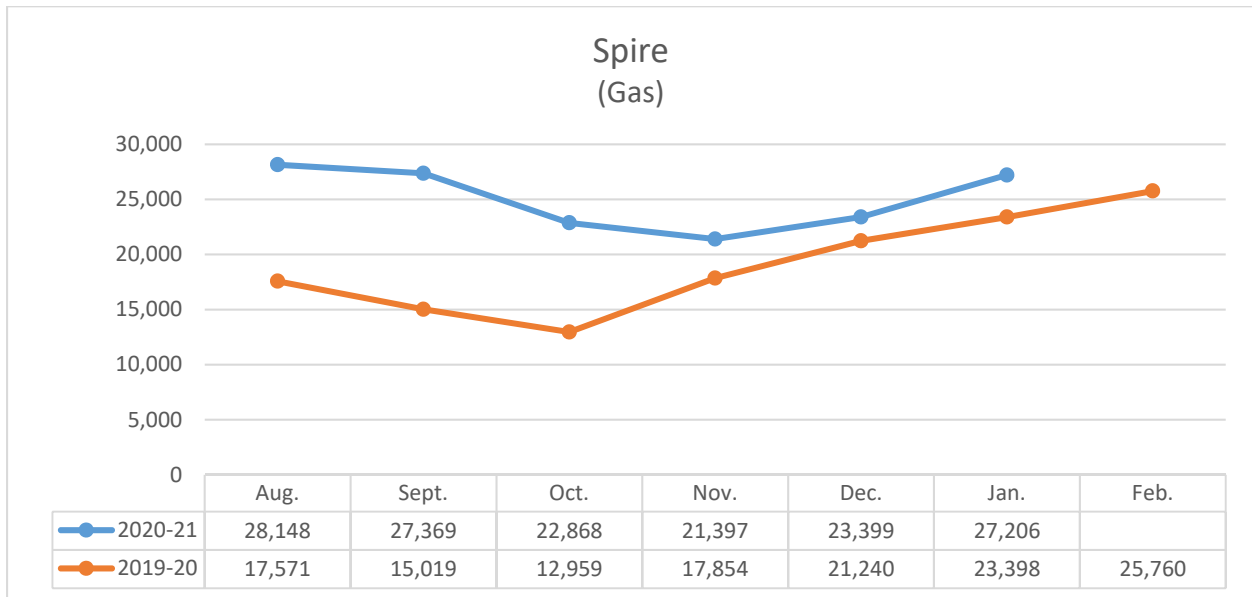
The previous data indicates that there were about 13% fewer Spire customers with past-due accounts in January 2021 versus January 2020 and approximately 9% less in January 2021 than in December 2020. Spire reported that past-due accounts are defined as accounts with arrear amounts owed for over 30 days that were not final billed at month’s end.

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



As shown by Spire’s data, for those customers who received a final disconnection notice there were about 8% more customers who were not disconnected in January 2021 versus January 2020 and approximately 9% more in January 2021 than in December 2020.

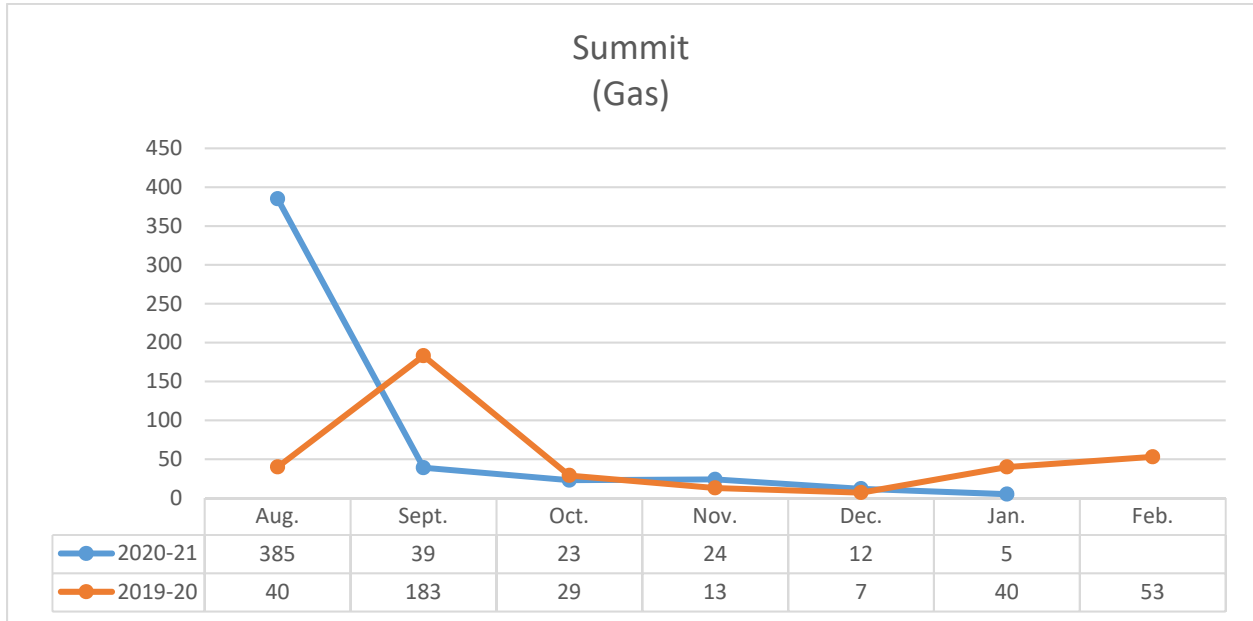
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 16% more Spire customers who participated in payment plans in January 2021 versus January 2020 and about 16% more in January 2021 than in December 2020.

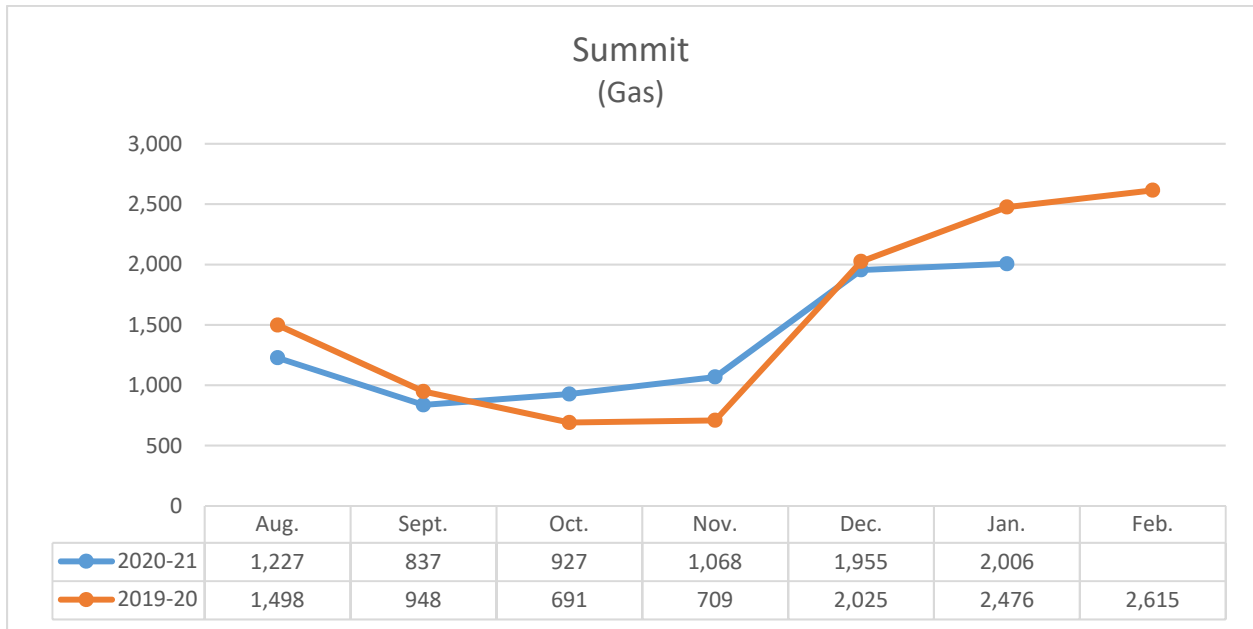
Questions 1 & 3 (Summit - Gas)

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



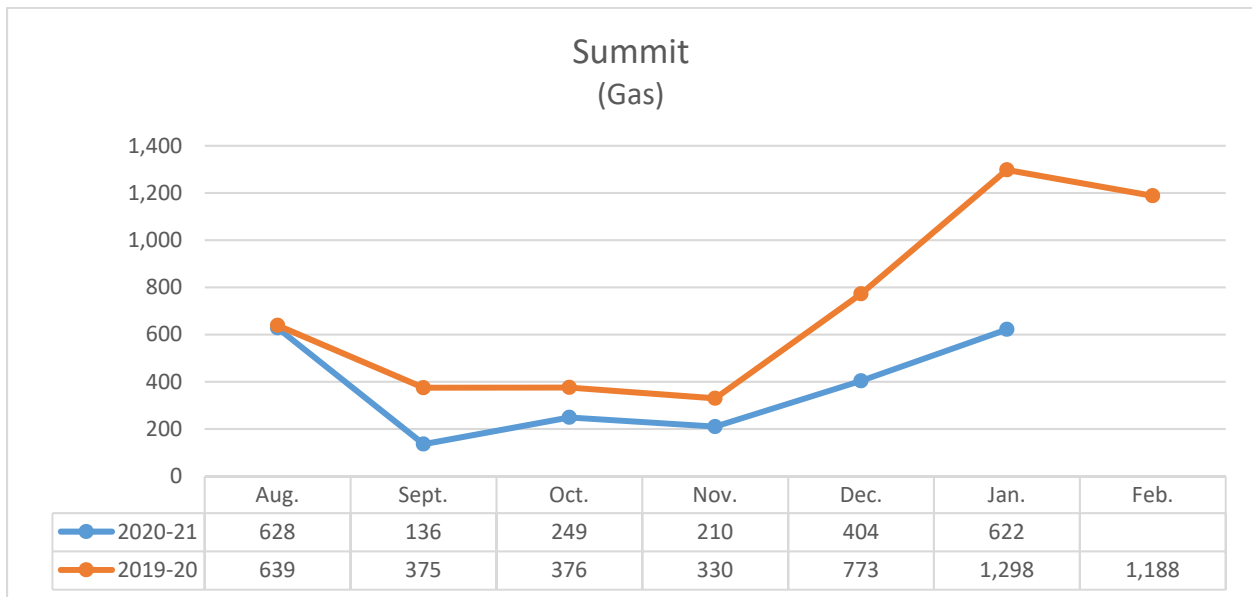
As shown in the previous graph, Summit performed approximately 88% fewer disconnections for non-payment in January 2021 versus January 2020 and about 58% less in January 2021 than in December 2020. The number of actual disconnections by Summit in January 2021 was approximately 88% below the number projected 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”



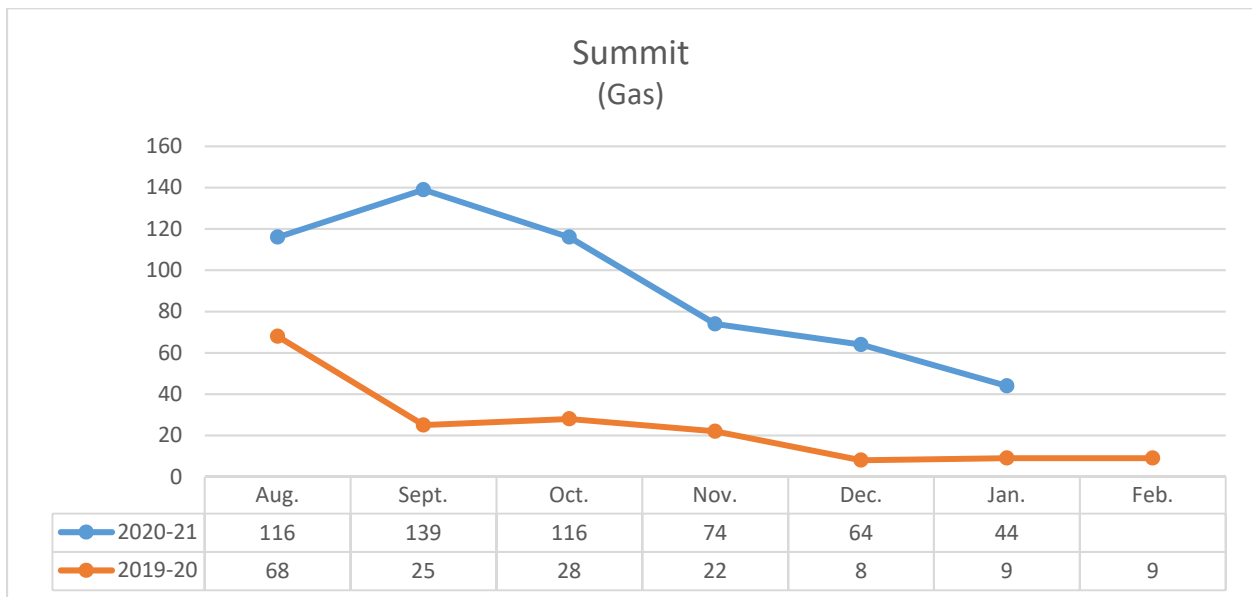
The previous data indicates that there were about 19% fewer Summit customers with past-due accounts in January 2021 versus January 2020 and approximately 3% more in January 2021 than in December 2020. Summit did not respond how it defines past-due accounts.

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



As shown by Summit’s data, for those customers who received a final disconnection notice there were about 52% fewer customers who were not disconnected in January 2021 versus January 2020 and approximately 54% more in January 2021 than in December 2020.

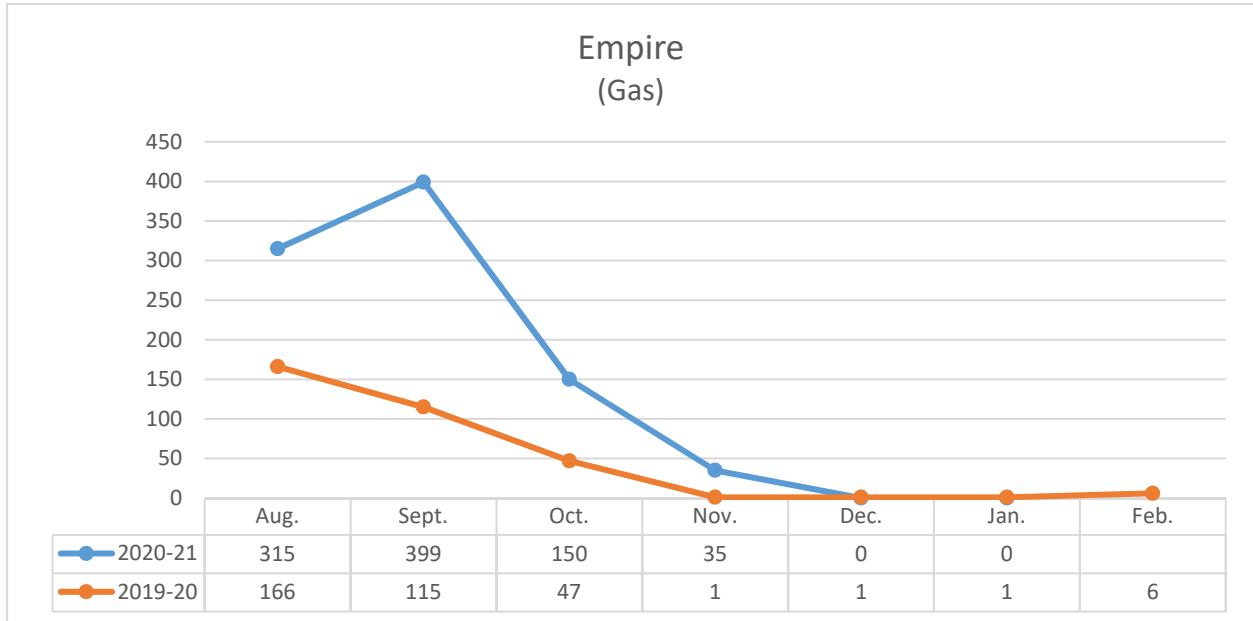
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 389% more Summit customers who participated in payment plans in January 2021 versus January 2020 and about 31% fewer in January 2021 than in December 2020.

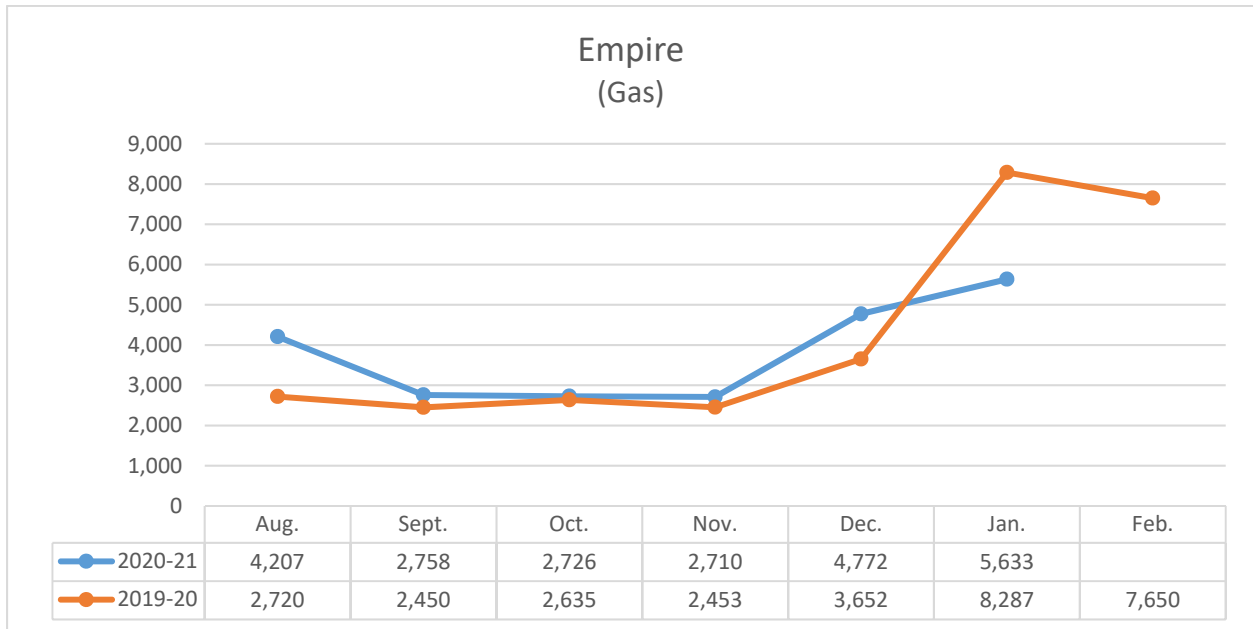
Questions 1 & 3 (Empire - Gas)

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



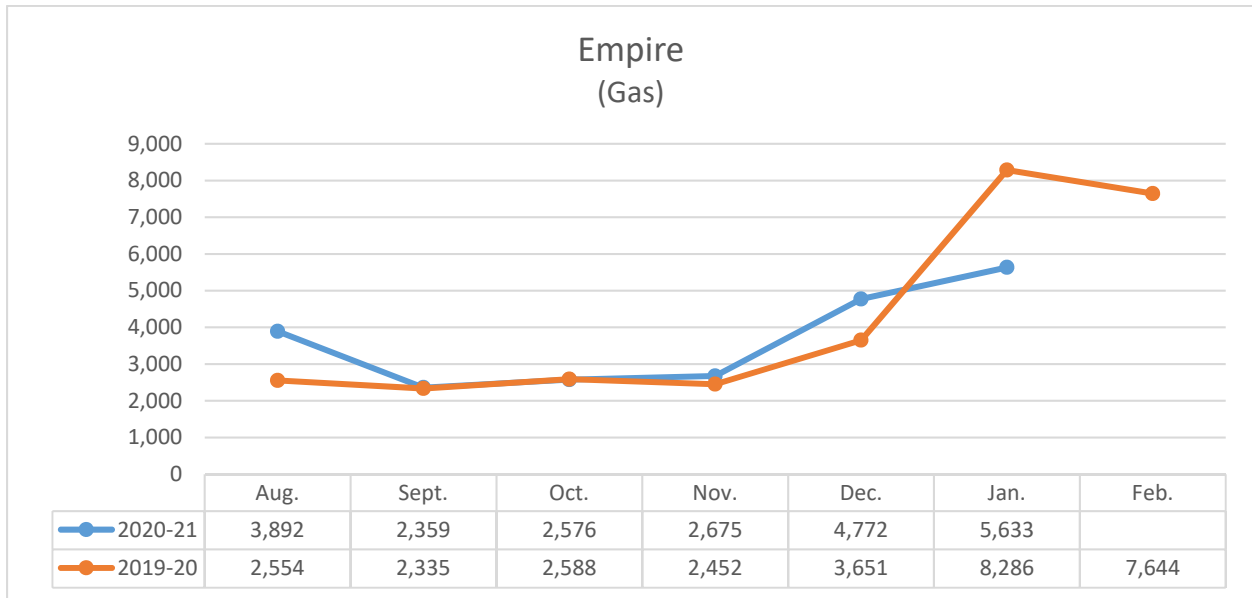
As shown in the previous graph, Empire performed no disconnections for non-payment in January 2021 versus one disconnection in January 2020, and the zero number of disconnections for non-payment in January 2021 compares to zero in December 2020. Empire had earlier provided a projection that it would perform 50 disconnections in January 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”



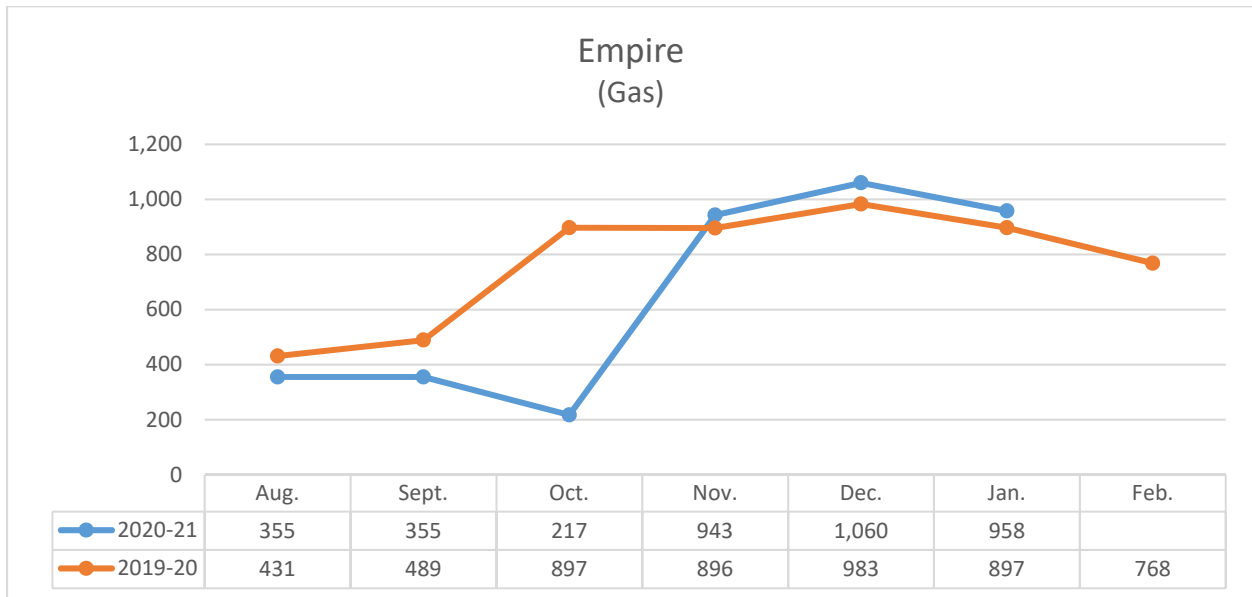
The previous data indicates that there were about 32% fewer Empire customers with past-due accounts in January 2021 versus January 2020 and approximately 18% more in January 2021 than in December 2020. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement due date.

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



As shown by Empire’s data, for those customers who received a final disconnection notice there were about 32% fewer customers who were not disconnected in January 2021 versus January 2020 and approximately 18% more in January 2021 than in December 2020.

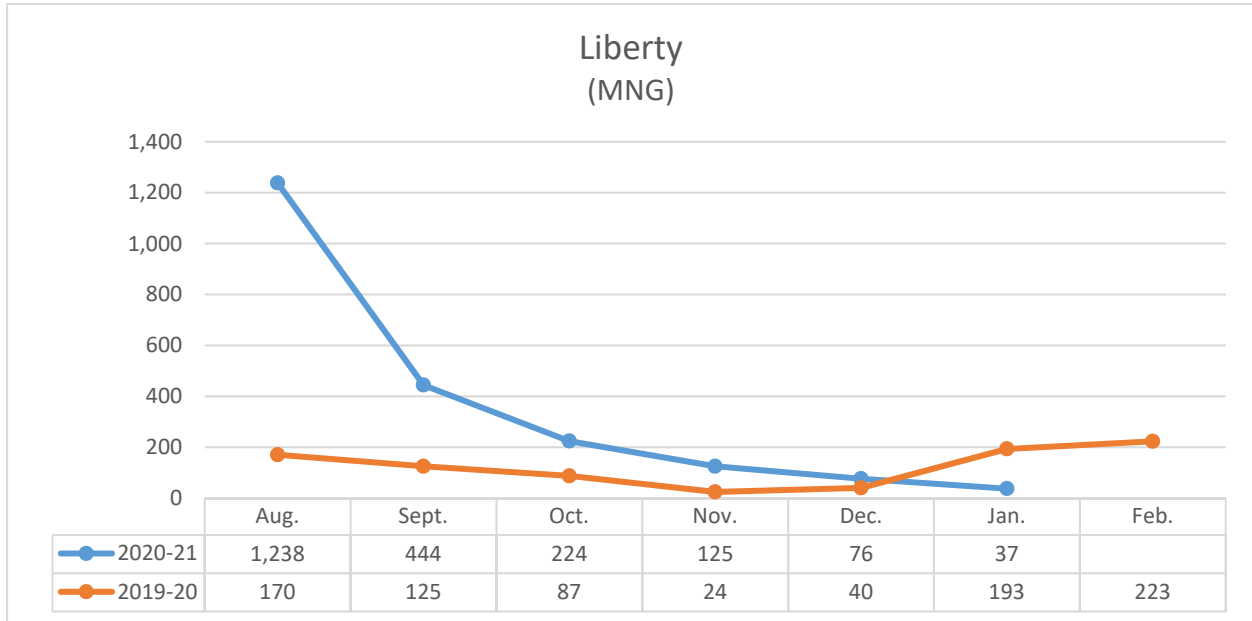
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 7% more Empire customers who participated in payment plans in January 2021 versus January 2020 and about 10% fewer in January 2021 than in December 2020.

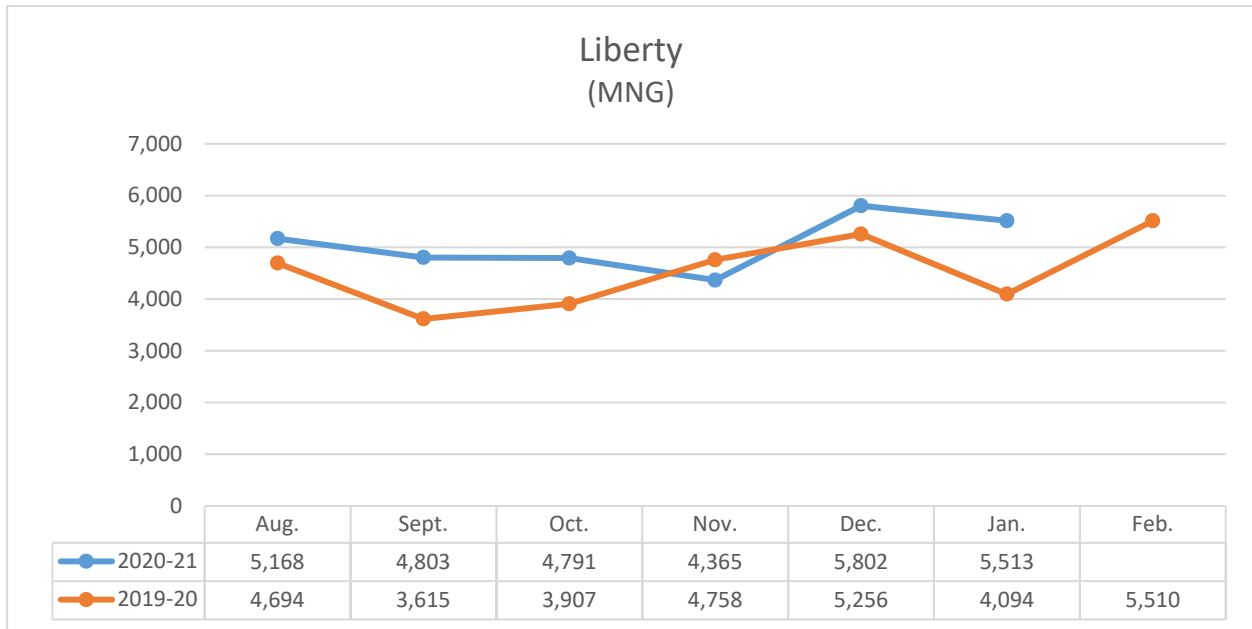
Questions 1 & 3 (Liberty - MNG - Gas)

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



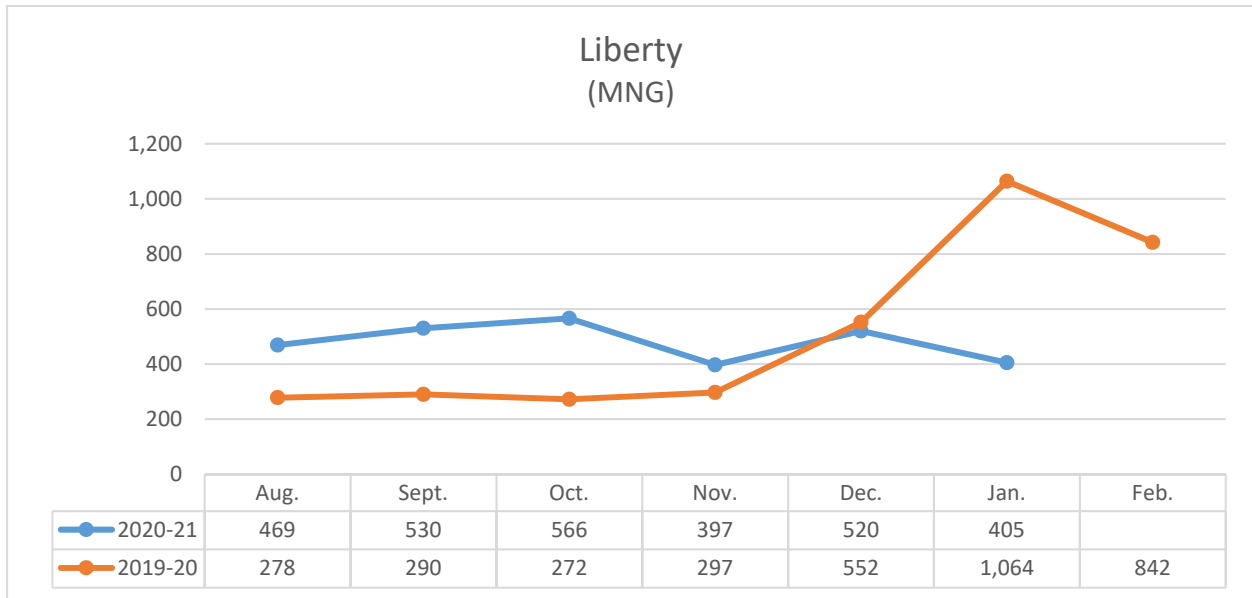
As shown in the previous graph, Liberty (MNG) performed approximately 81% fewer disconnections for non-payment in January 2021 versus January 2020 and about 51% less in January 2021 than in December 2020. The number of actual disconnections by Liberty (MNG) in January 2021 was approximately 48% above 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”



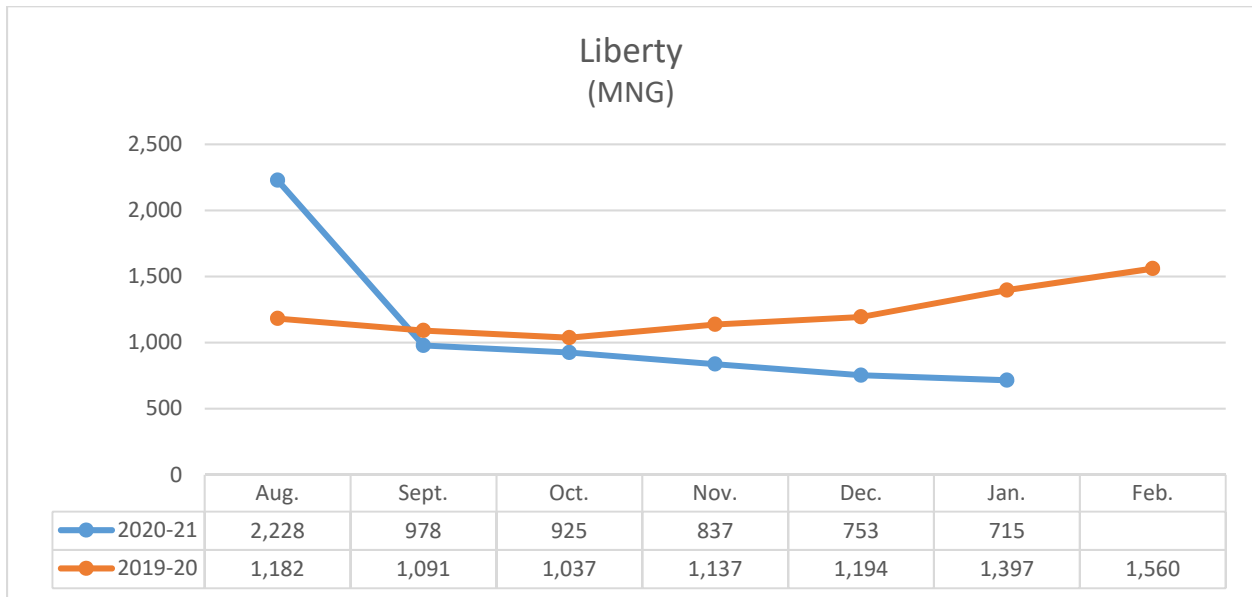
The previous data indicates that there were about 35% more Liberty (MNG) customers with past-due accounts in January 2021 versus January 2020 and approximately 5% fewer in January 2021 than in December 2020. Liberty (MNG) reported that it considers accounts past-due when they have a past-due balance for greater than two days and they are not on budget billing.

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



As shown by Liberty (MNG)’s data, for those customers who received a final disconnection notice there were about 62% fewer customers who were not disconnected in January 2021 versus January 2020 and approximately 22% less in January 2021 than in December 2020.

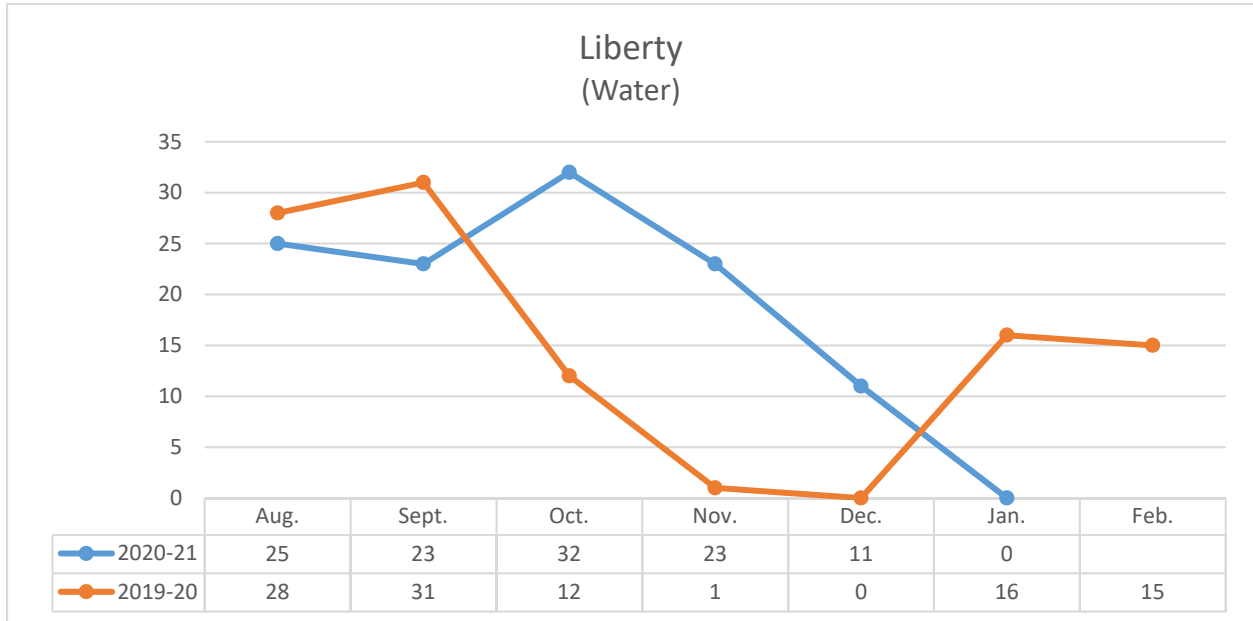
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 49% fewer Liberty (MNG) customers who participated in payment plans in January 2021 versus January 2020 and 5% less in January 2021 than in December 2020.

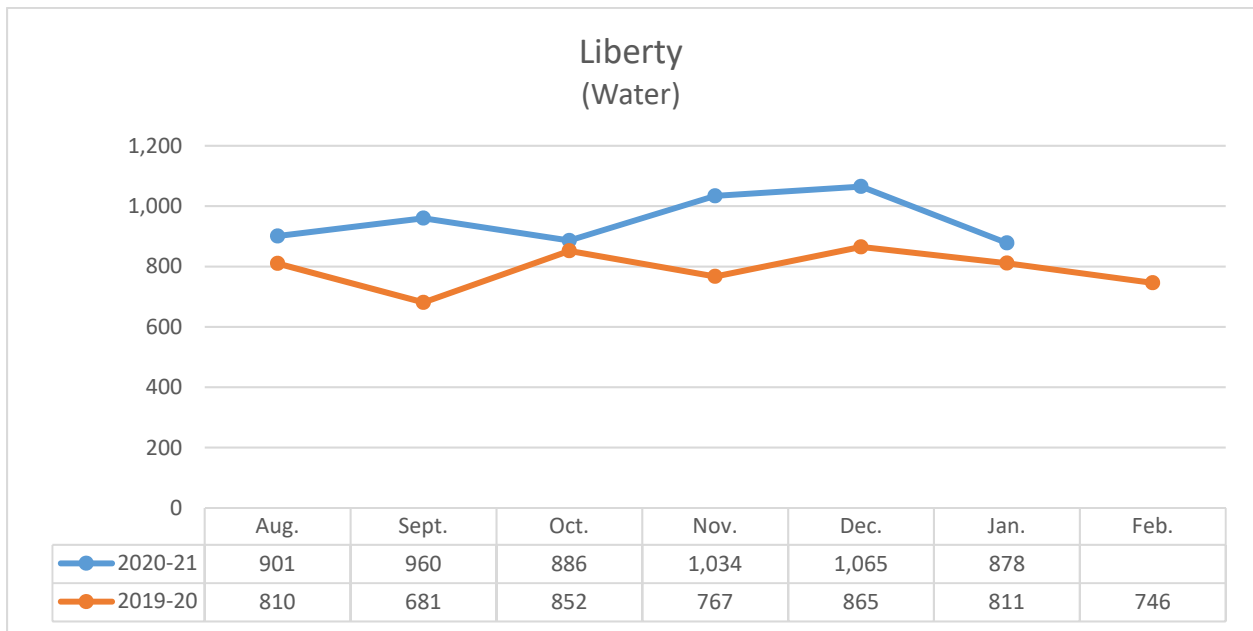
Questions 1 & 3 (Liberty - Water)

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



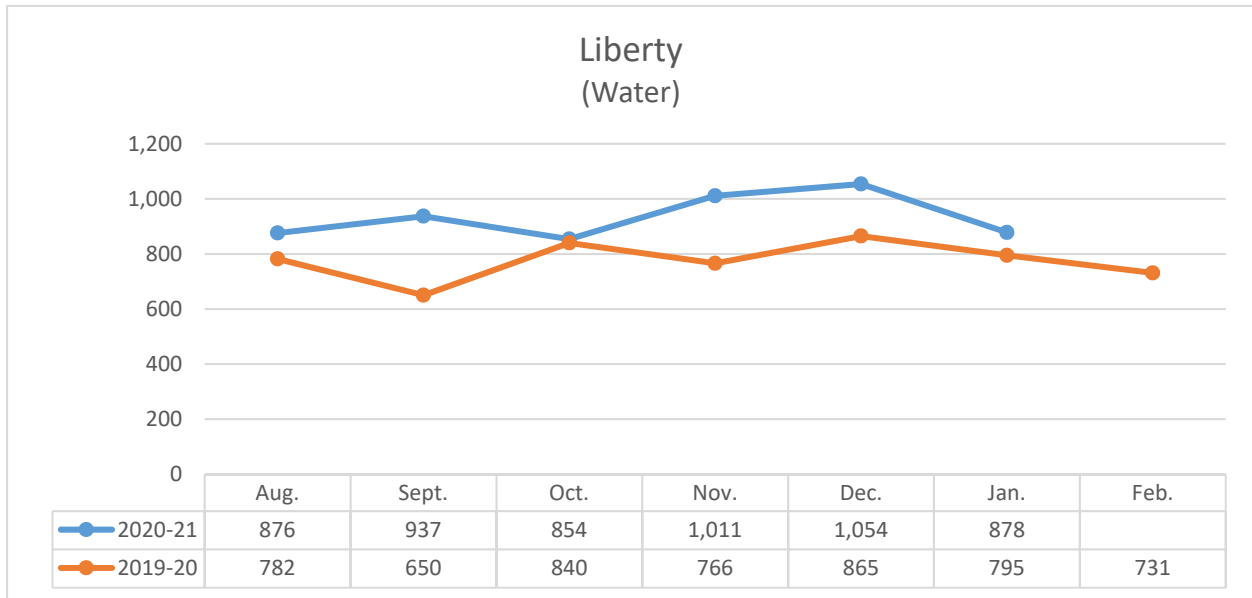
As shown in the previous graph, Liberty performed no disconnections for non-payment in January 2021 versus 16 in January 2020 and compared to 11 in December 2020. Liberty projected 40 disconnections for non-payment in January 2021.

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”



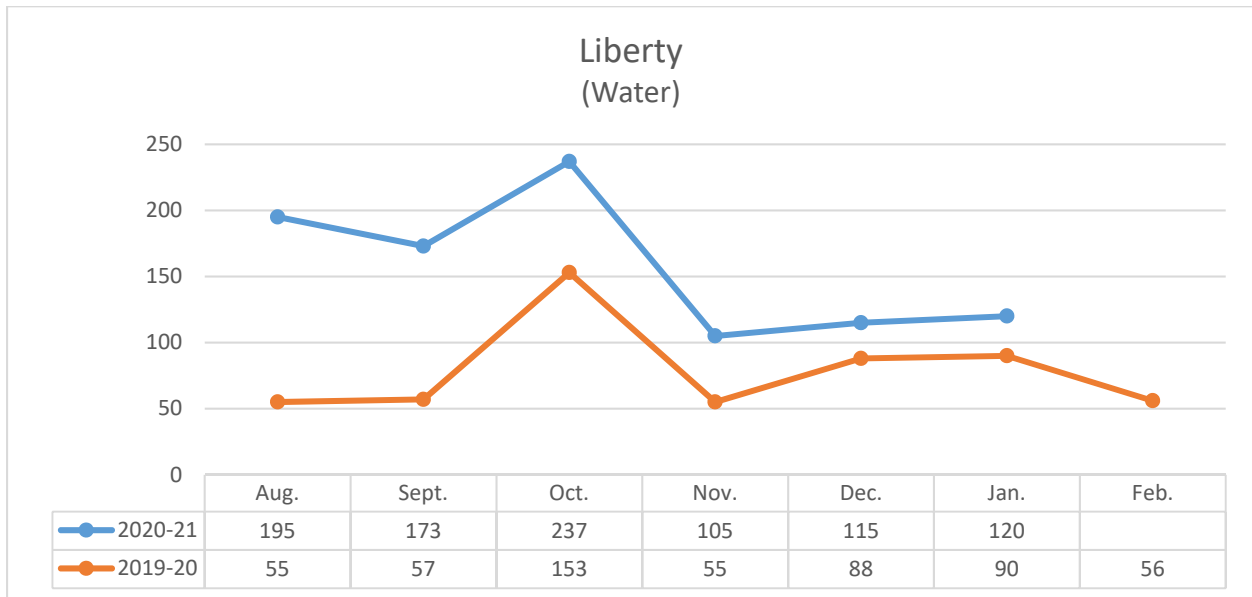
The previous data indicates that there were about 8% more Liberty customers with past-due accounts in January 2021 versus January 2020 and approximately 18% fewer in January 2021 than in December 2020. Liberty reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement due date.

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



As shown by Liberty’s data, for those customers who received a final disconnection notice there were about 10% more customers who were not disconnected in January 2021 versus January 2020 and approximately 17% fewer in January 2021 than in December 2020.

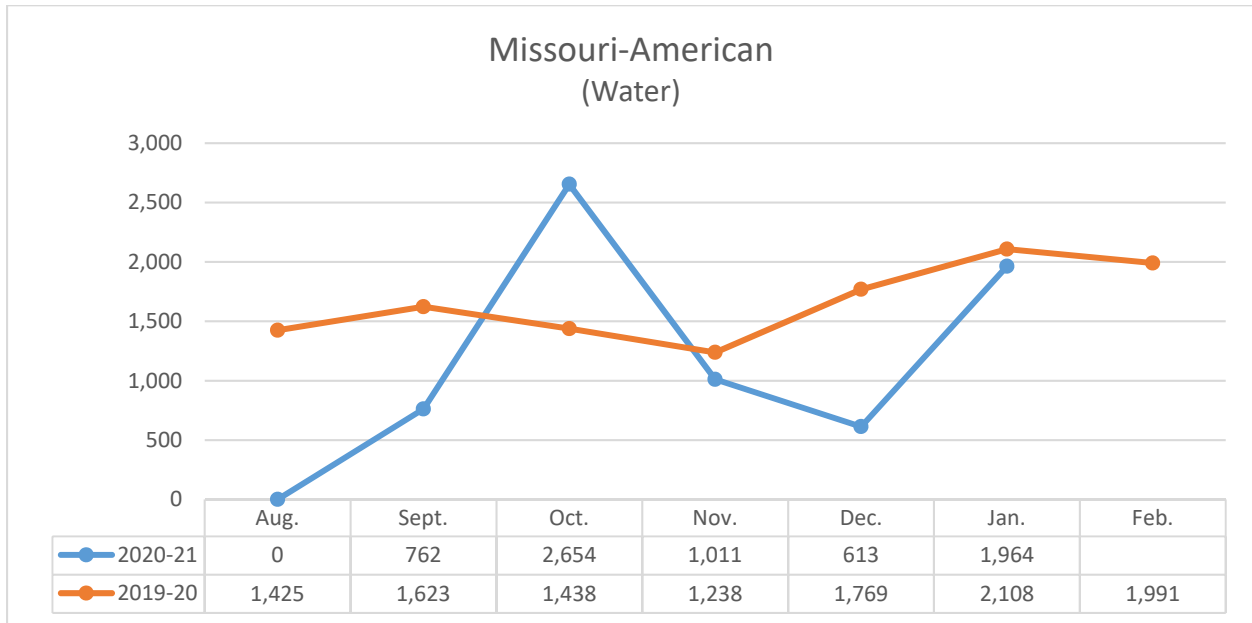
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 33% more Liberty customers who participated in payment plans in January 2021 versus January 2020 and about 4% more in January 2021 than in December 2020.

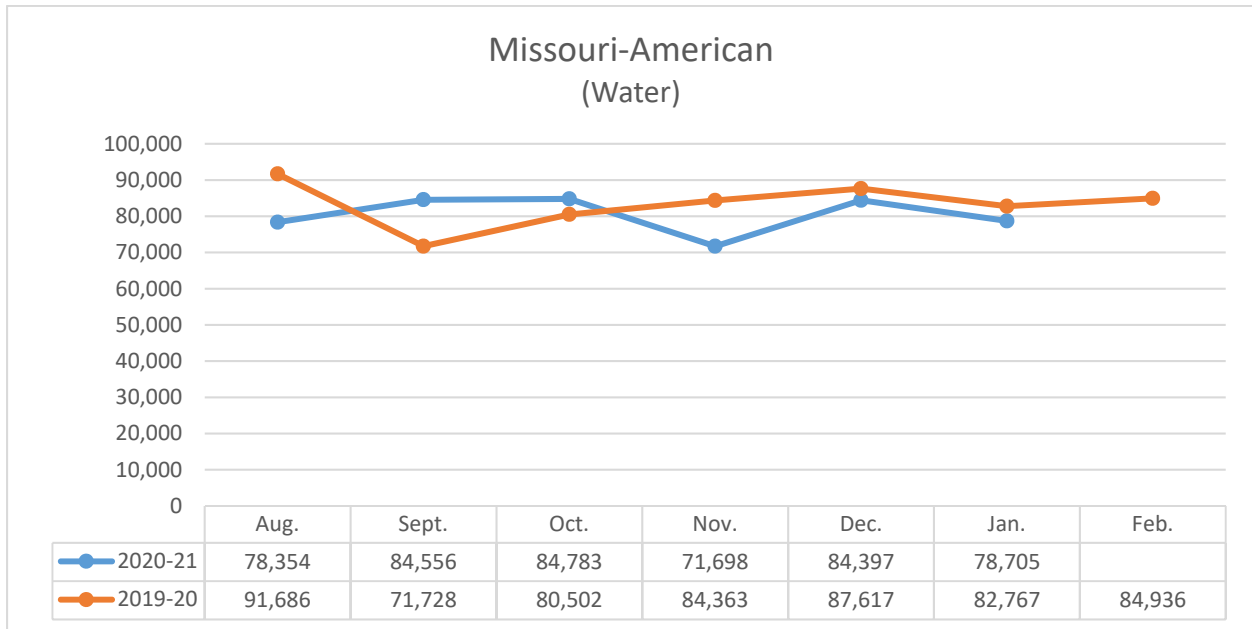
Questions 1 & 3 (Missouri-American - Water)

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



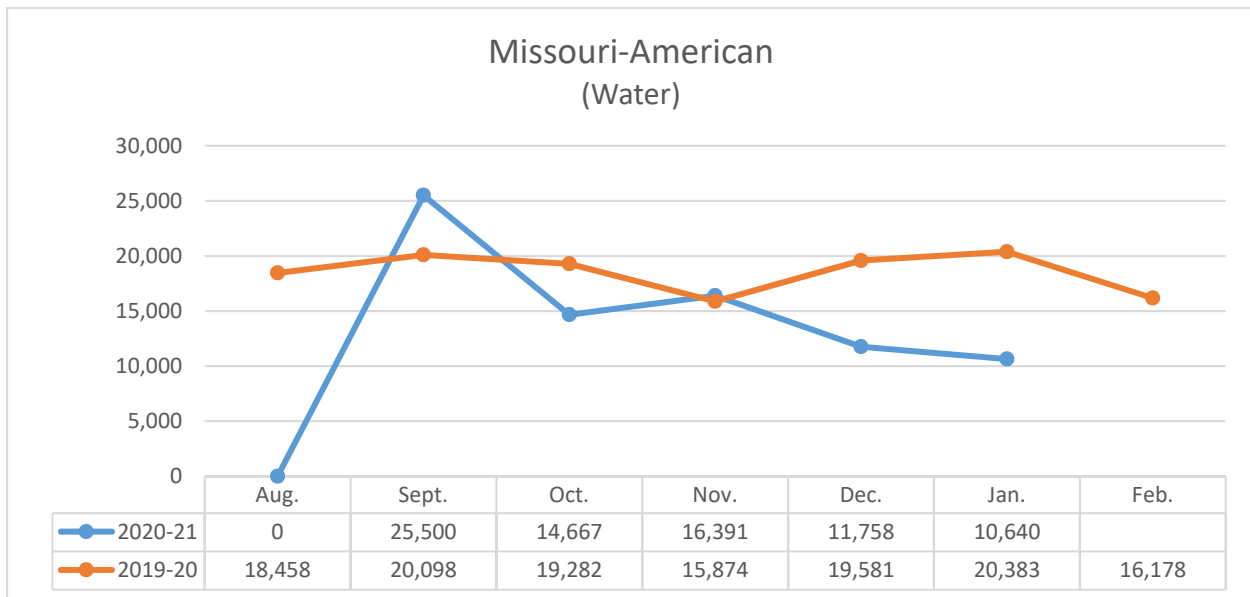
As shown in the previous graph, Missouri-American performed approximately 7% fewer disconnections for non-payment in January 2021 versus January 2020 and about 220% more in January 2021 than in December 2020. Missouri-American does not forecast the number of disconnections for non-payment.

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



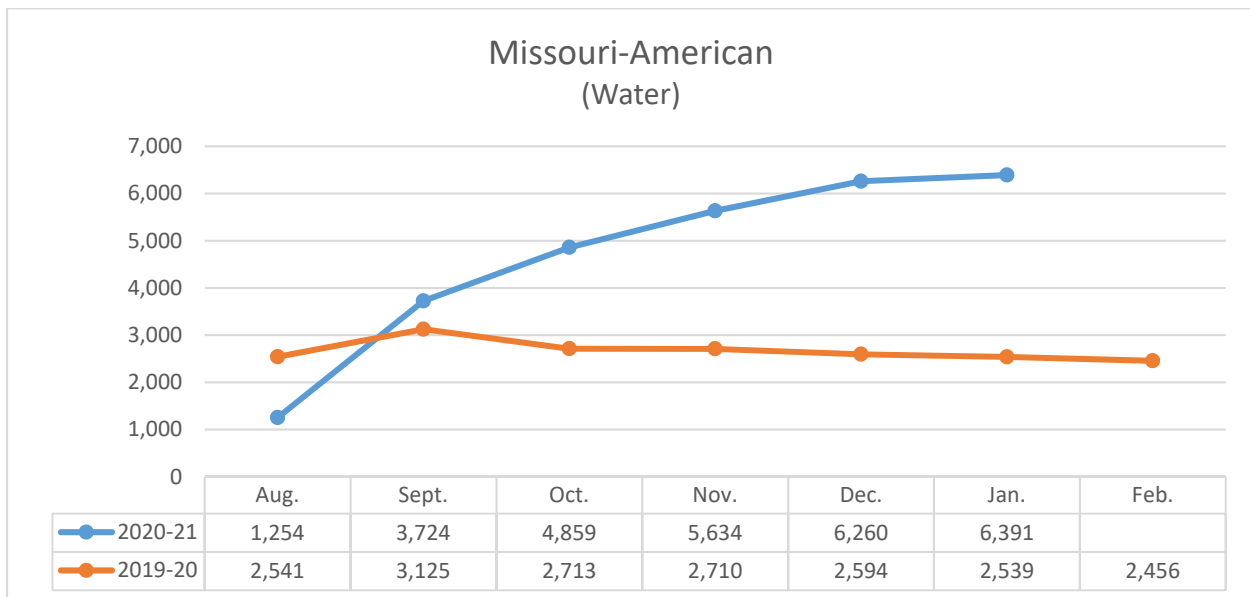
The previous data indicates that there were about 5% fewer Missouri-American customers with past-due accounts in January 2021 versus January 2020 and approximately 7% fewer in January 2021 than in December 2020. Missouri-American reported that it defines “past-due” as any unpaid amount past the due date on the customer bill.

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



As shown by Missouri-American’s data, for those customers who received a final disconnection notice there were about 48% fewer customers who were not disconnected in January 2021 versus January 2020 and approximately 10% less in January 2021 than in December 2020.

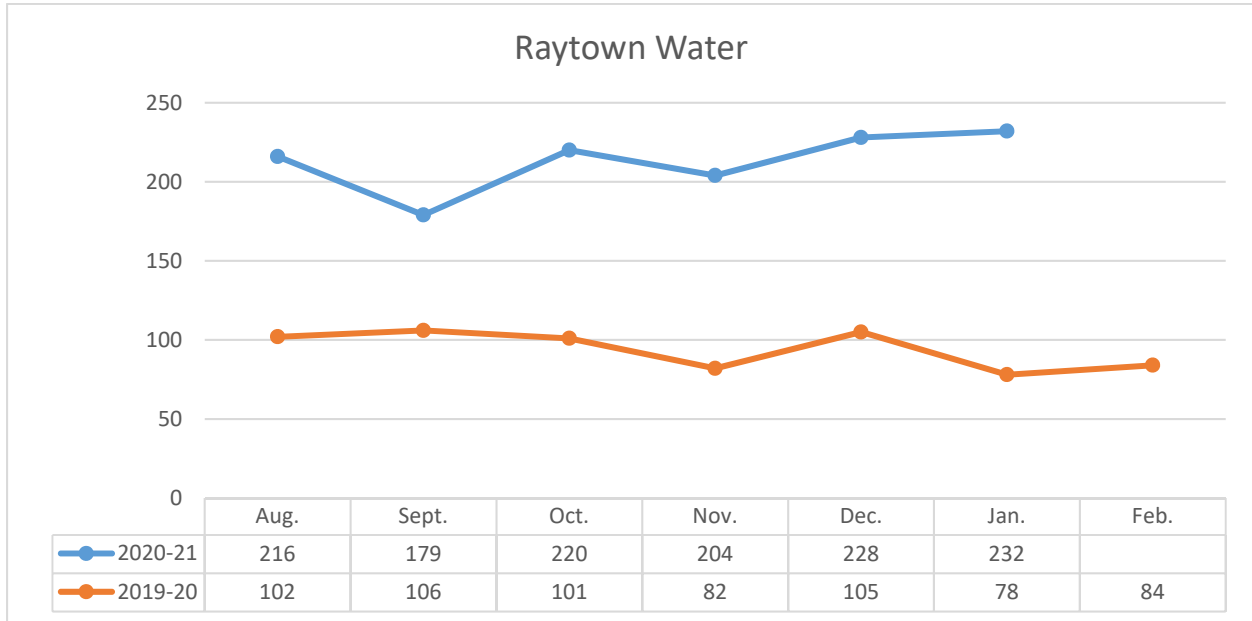
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 152% more Missouri-American customers who participated in payment plans in January 2021 versus January 2020 and about 2% more in January 2021 than in December 2020.

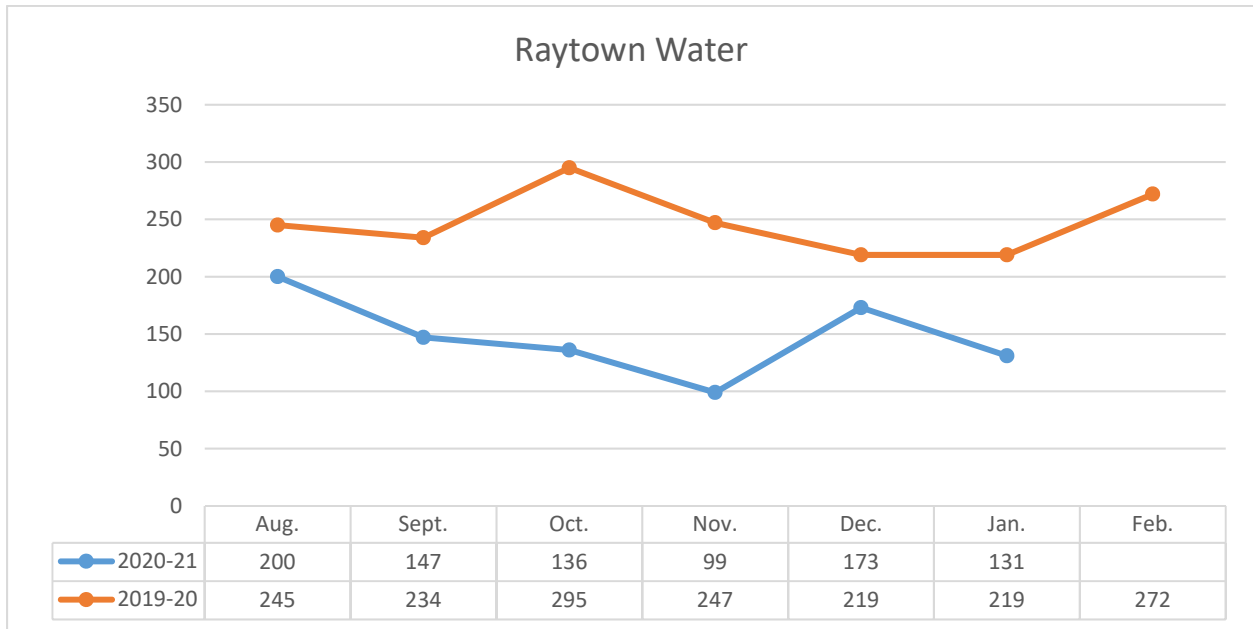
Questions 1 & 3 (Raytown Water)

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



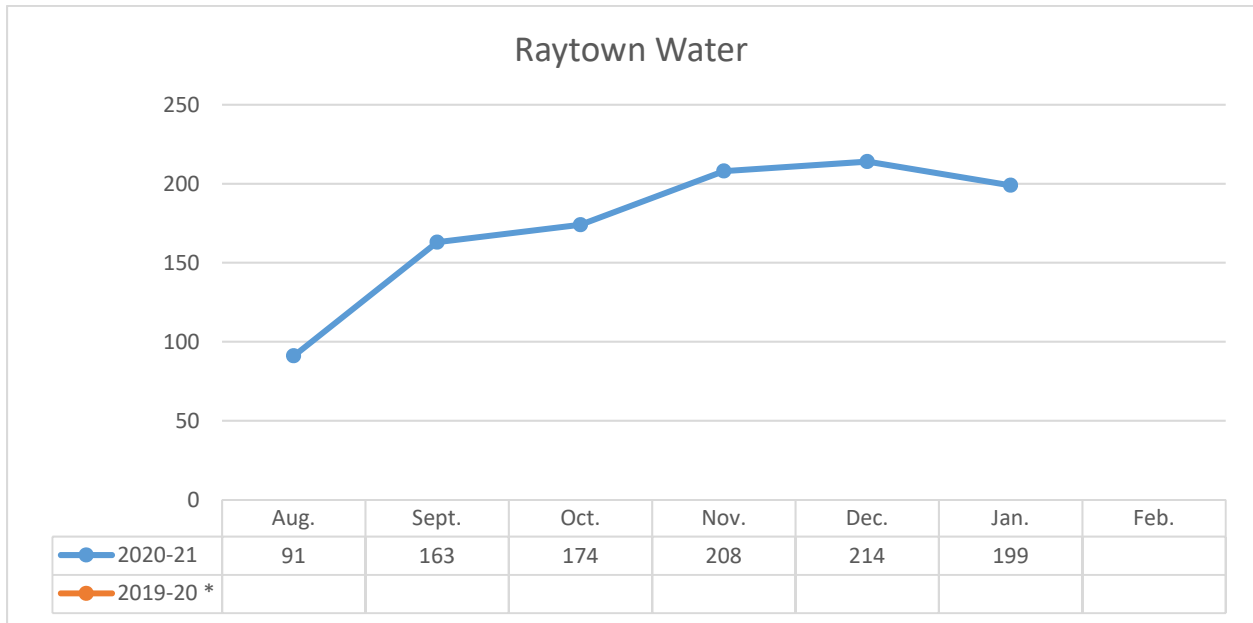
As shown in the previous graph, Raytown Water performed approximately 197% more disconnections for non-payment in January 2021 versus January 2020 and about 2% more in January 2021 than in December 2020. The number of actual disconnections by Raytown Water in December 2020 was approximately 173% above 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 40% fewer Raytown Water customers with past-due accounts in January 2021 versus January 2020 and approximately 24% fewer in January 2021 than in December 2020. Raytown Water reported that it defines “past-due” as accounts with balances that are over 31 days.

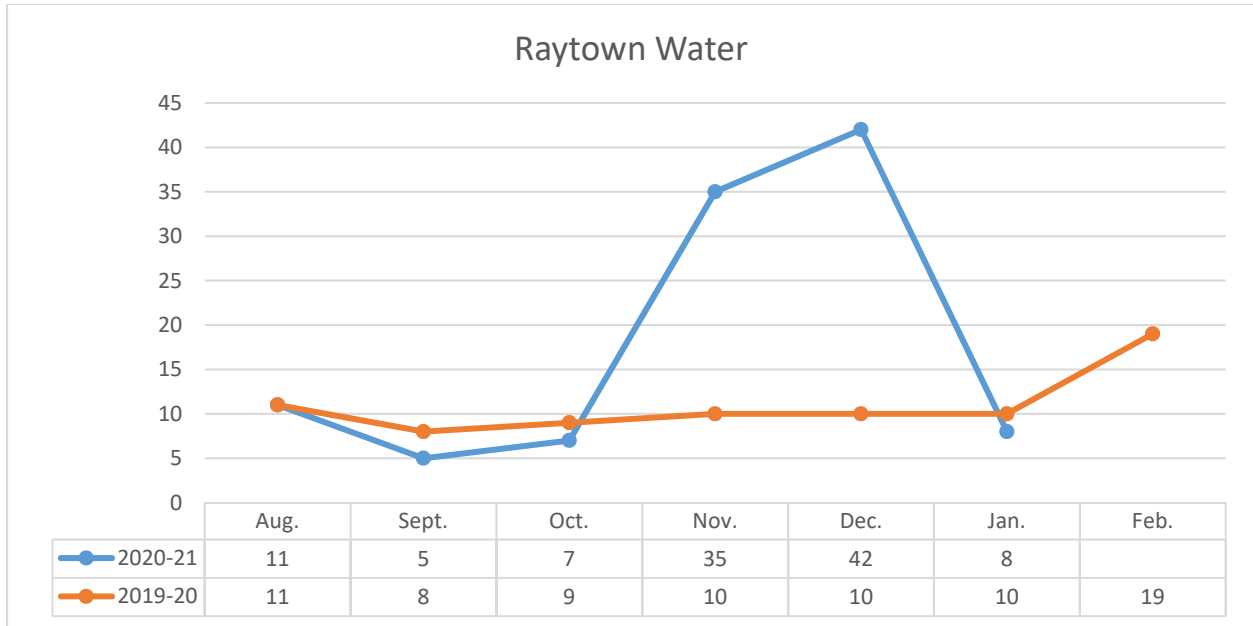
c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end



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

As shown by Raytown Water’s data, 199 customers received a final disconnection notice in January 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 7% fewer customers that received a final disconnection notice but were not disconnected for non-payment of service in January 2021 than in December 2020.

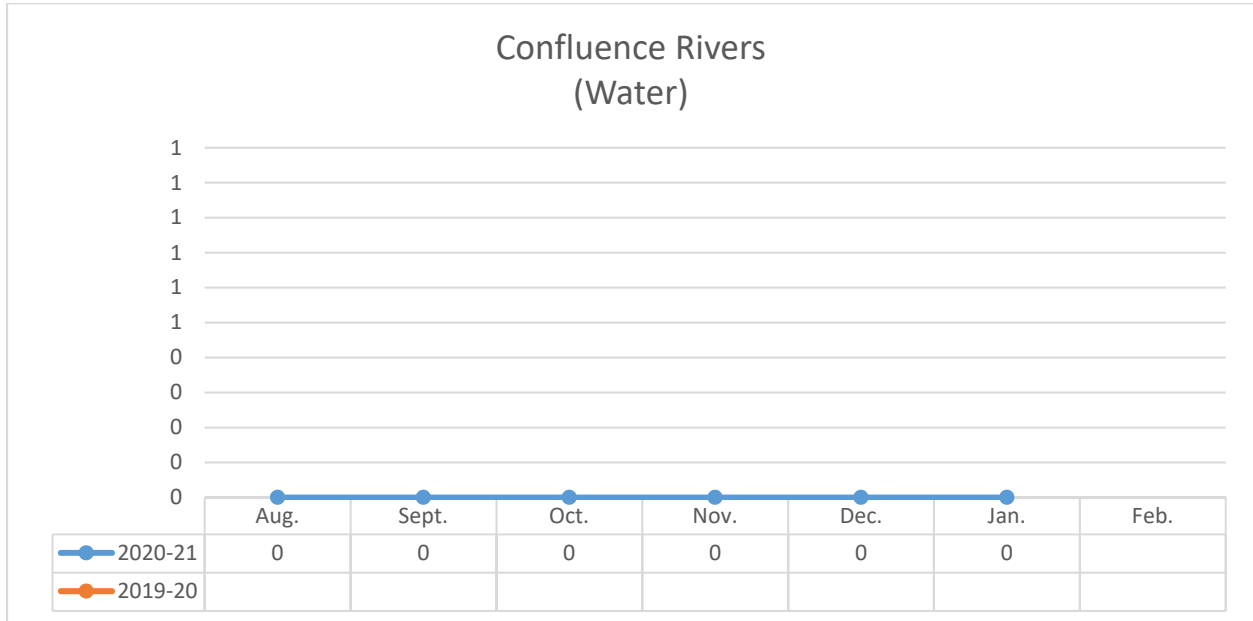
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 20% fewer Raytown Water customers who participated in payment plans in January 2021 versus January 2020 and about 81% fewer in January 2021 than in December 2020.

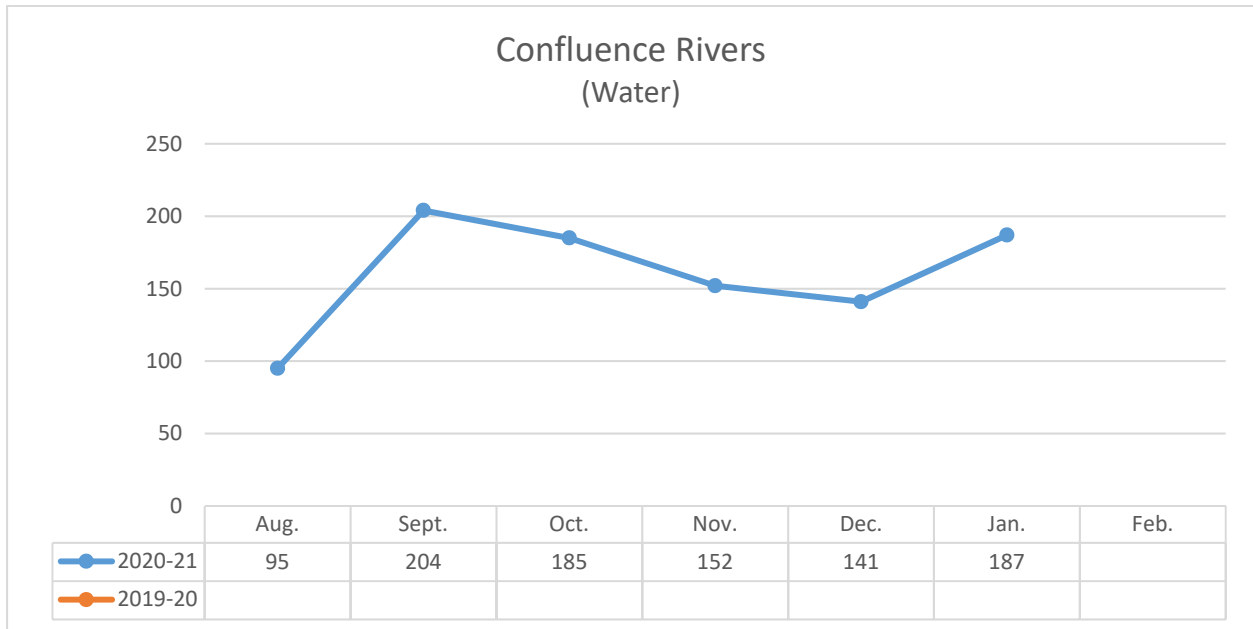
Questions 1 & 3 (Confluence Rivers - Water)

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



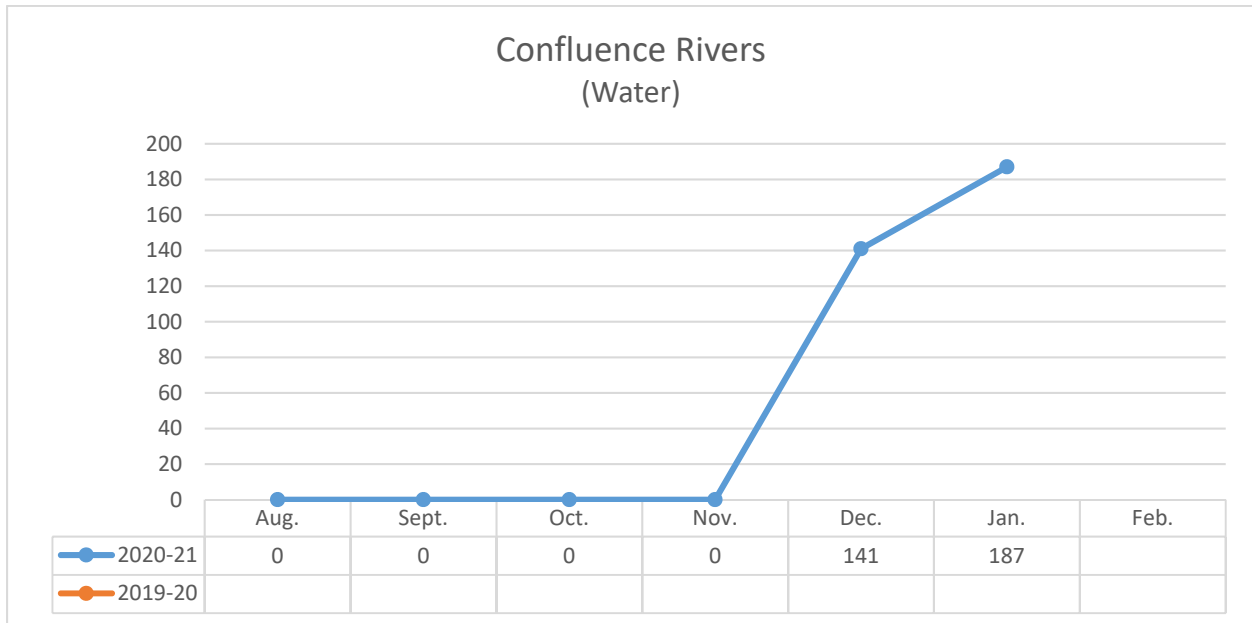
As shown in the previous graph, Confluence Rivers performed no disconnections in January 2021. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 24 disconnections was performed. Confluence Rivers does not forecast the number of disconnections for non-payment.

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”



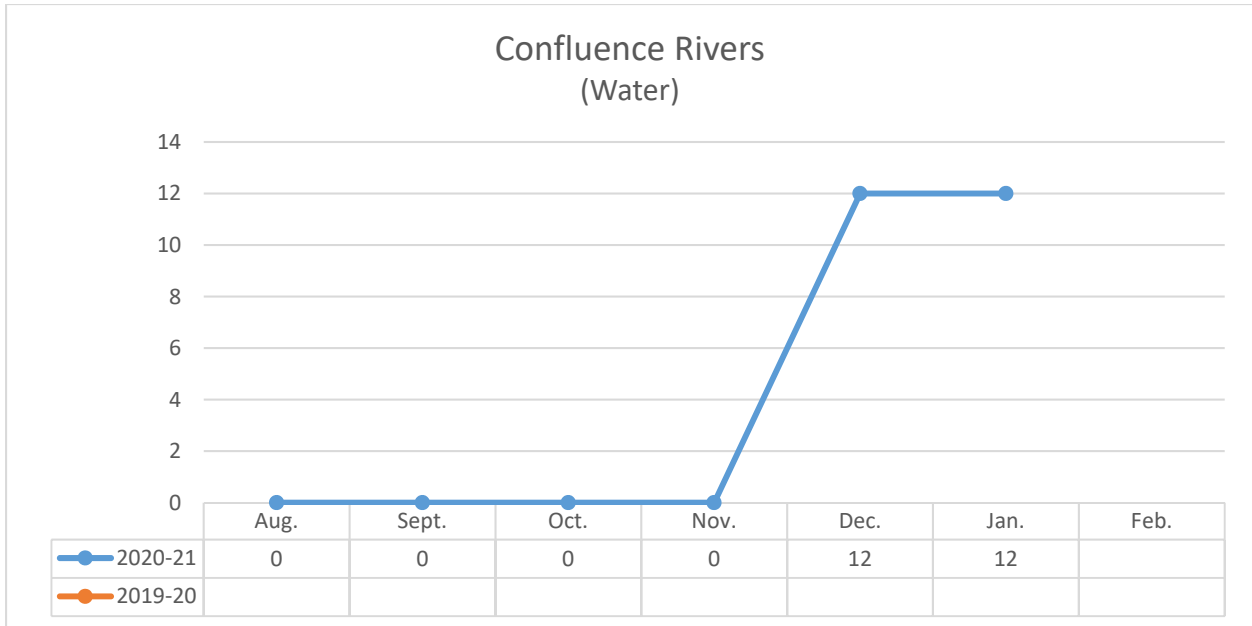
The previous data indicates there were about 33% more Confluence Rivers customers with past-due accounts in January 2021 versus December 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 37 customers with “past-due” accounts during this time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

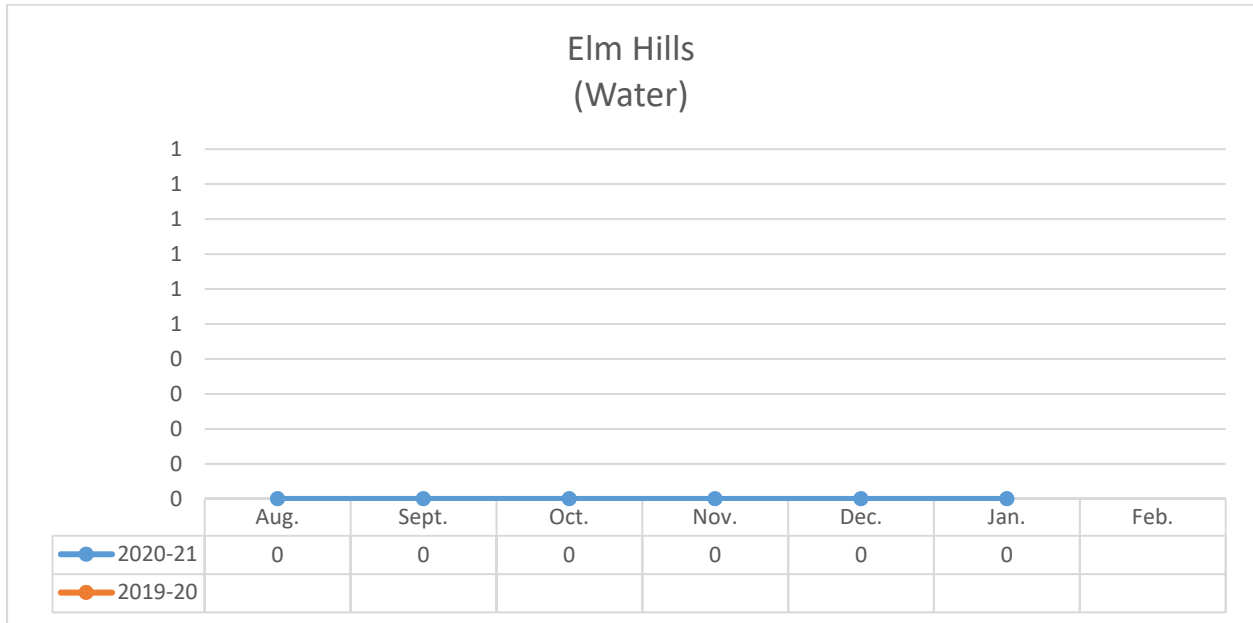
d) The number of customers at each month-end participating in payment plans



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.

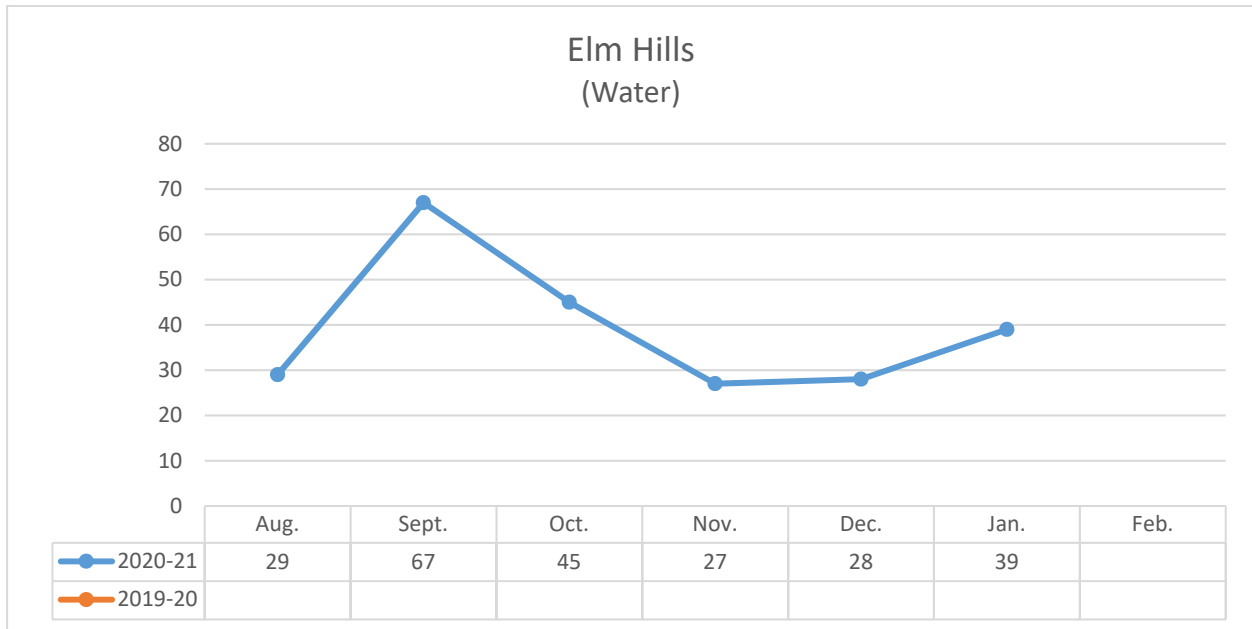
Questions 1 & 3 (Elm Hills - Water)

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



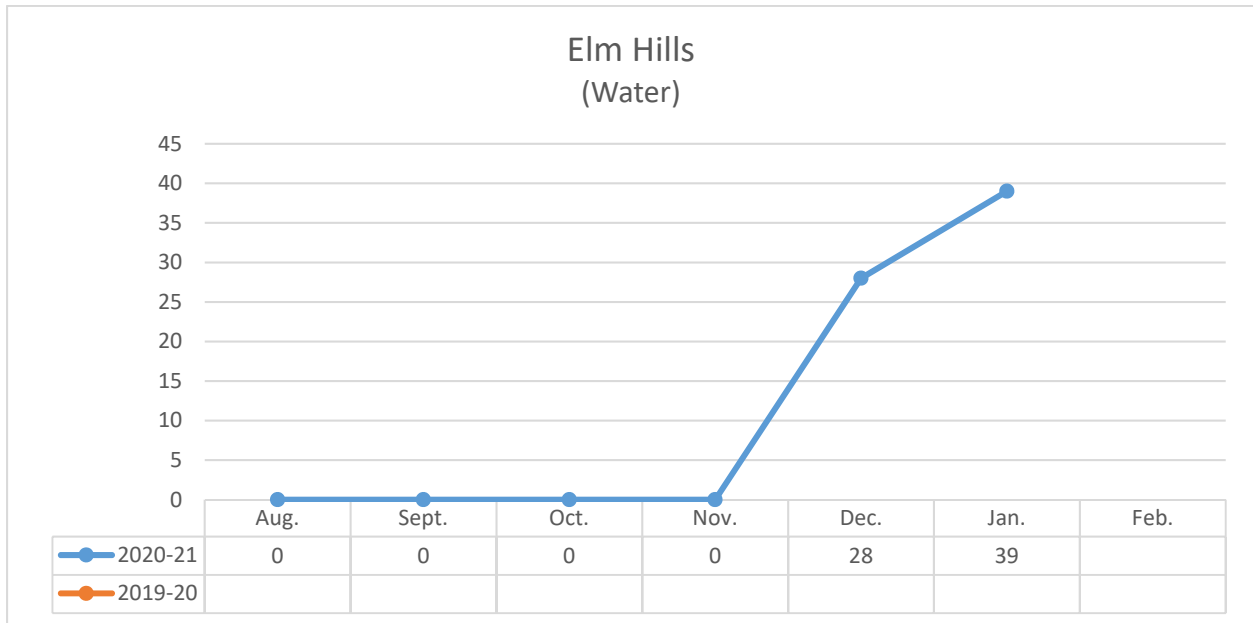
As shown in the previous graph, Elm Hills performed no disconnections in January 2021. No monthly, comparative data was provided for August 2019 to February 2020, although no disconnections were performed during this time period.

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”



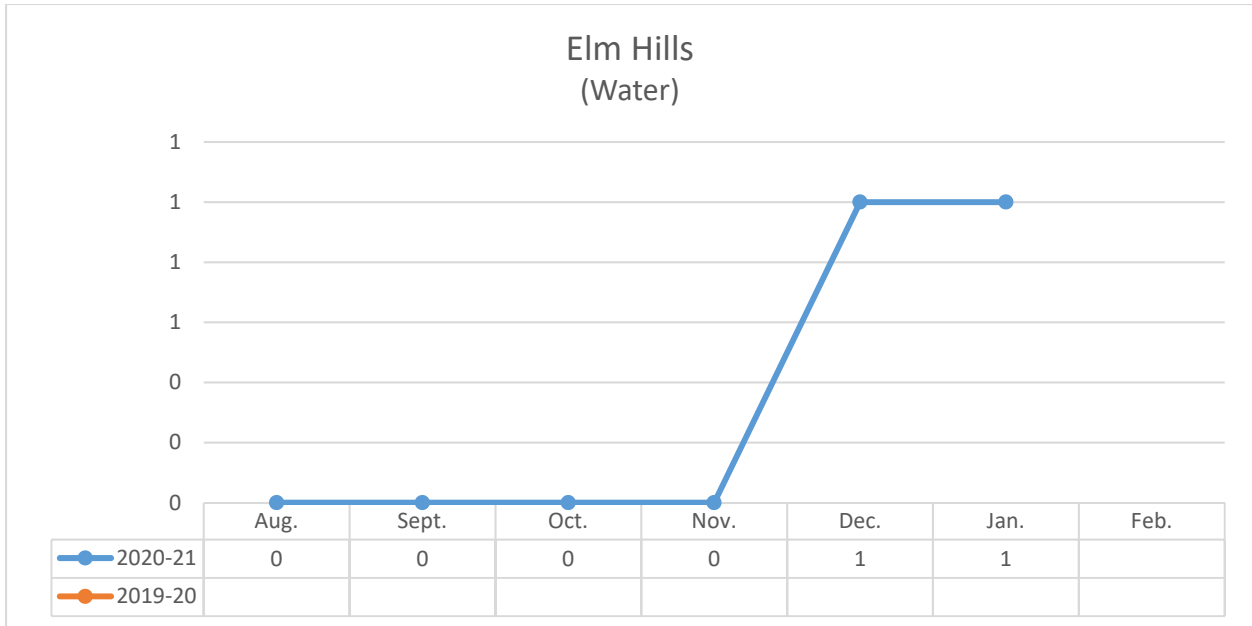
The previous data indicates there were about 39% more Elm Hills customers with past-due accounts in January 2021 versus December 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 1 customer with a “past-due” account during this time period.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

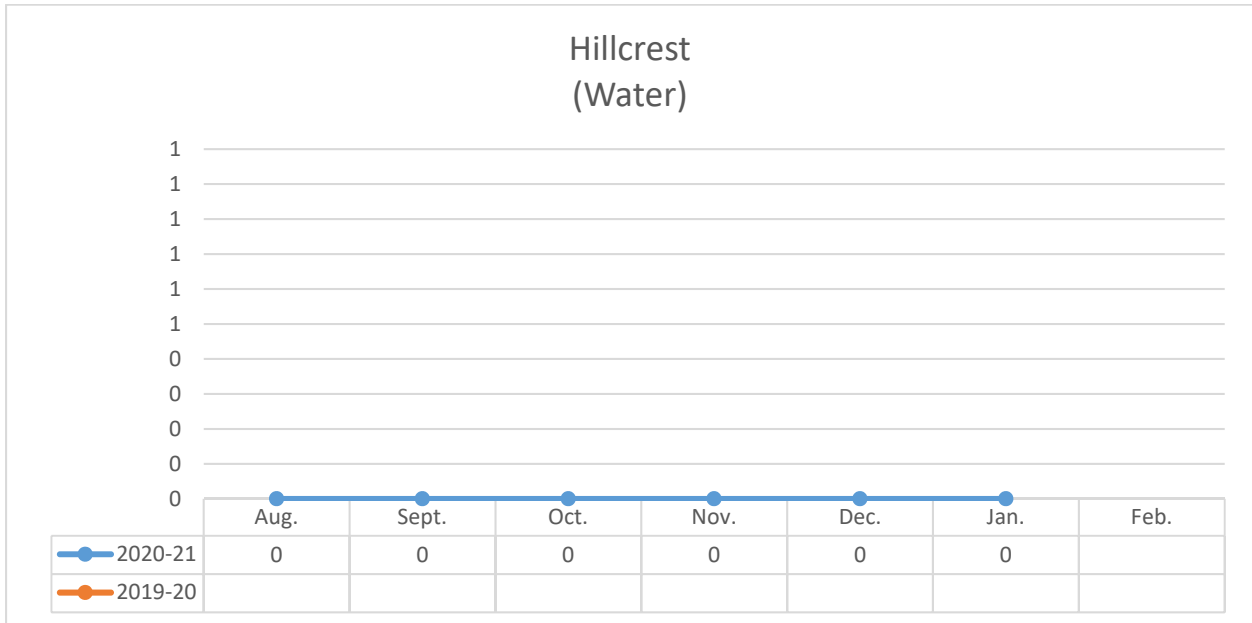
d) The number of customers at each month-end participating in payment plans



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.

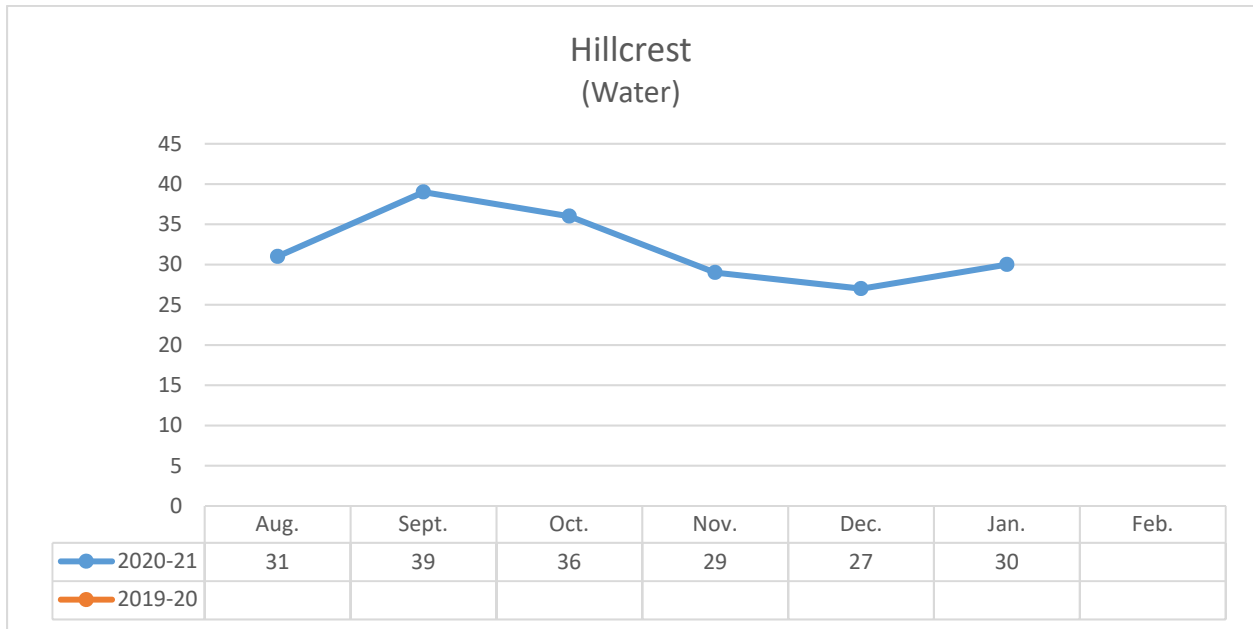
Questions 1 & 3 (Hillcrest - Water)

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



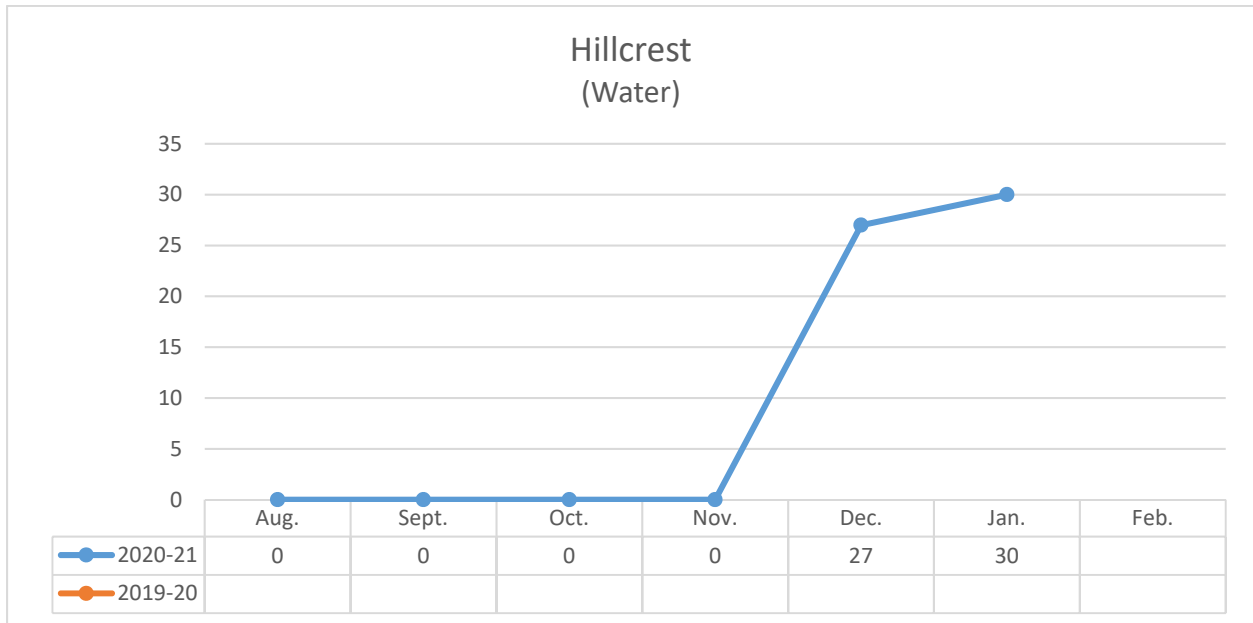
As shown in the previous graph, Hillcrest performed no disconnections in January 2021. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 12 disconnections was performed during this time period.

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”



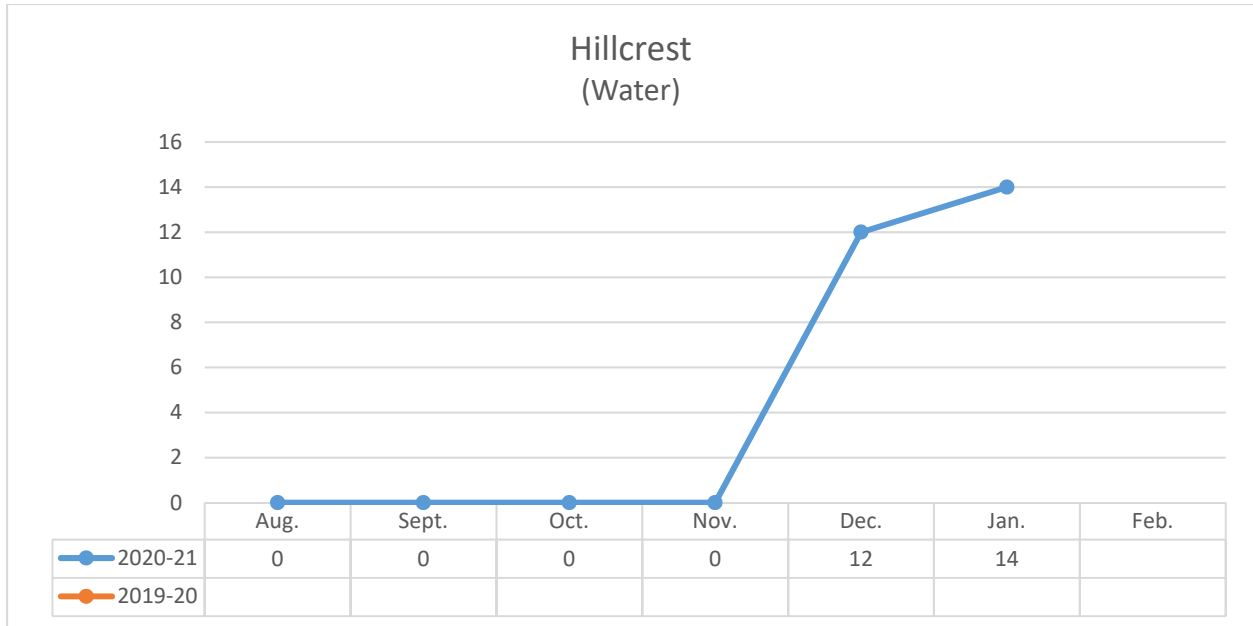
The previous data indicates there were about 11% more Hillcrest customers with past-due accounts in January 2021 versus December 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 16 customers with “past-due” accounts during this time period.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

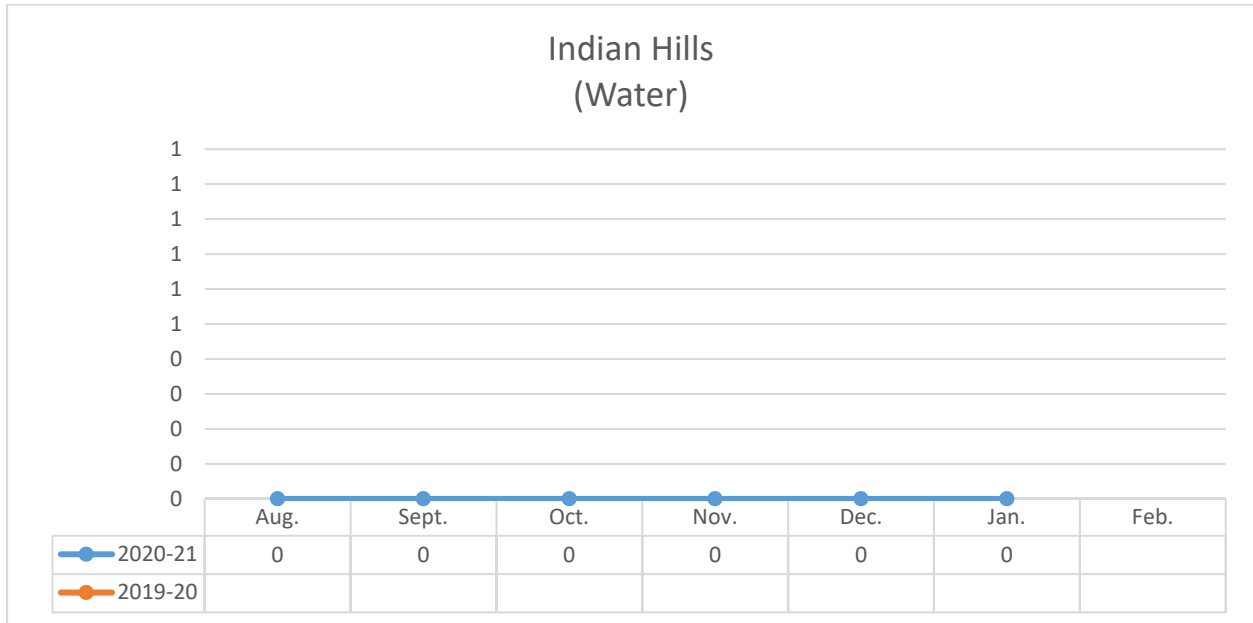
d) The number of customers at each month-end participating in payment plans



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.

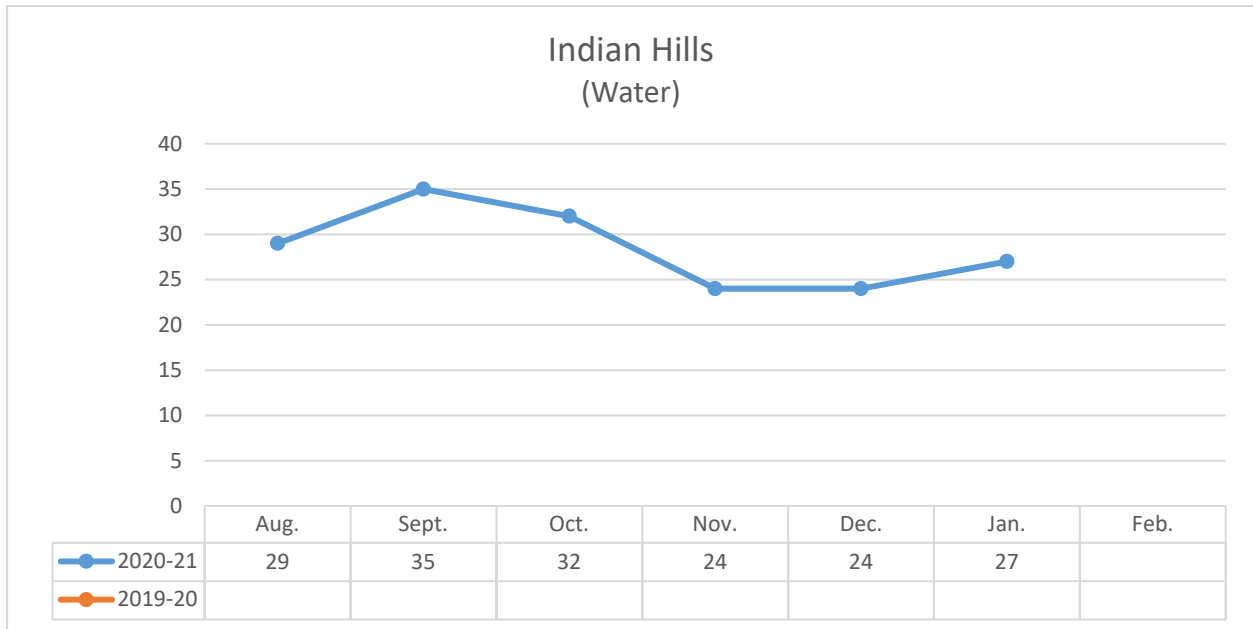
Questions 1 & 3 (Indian Hills - Water)

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



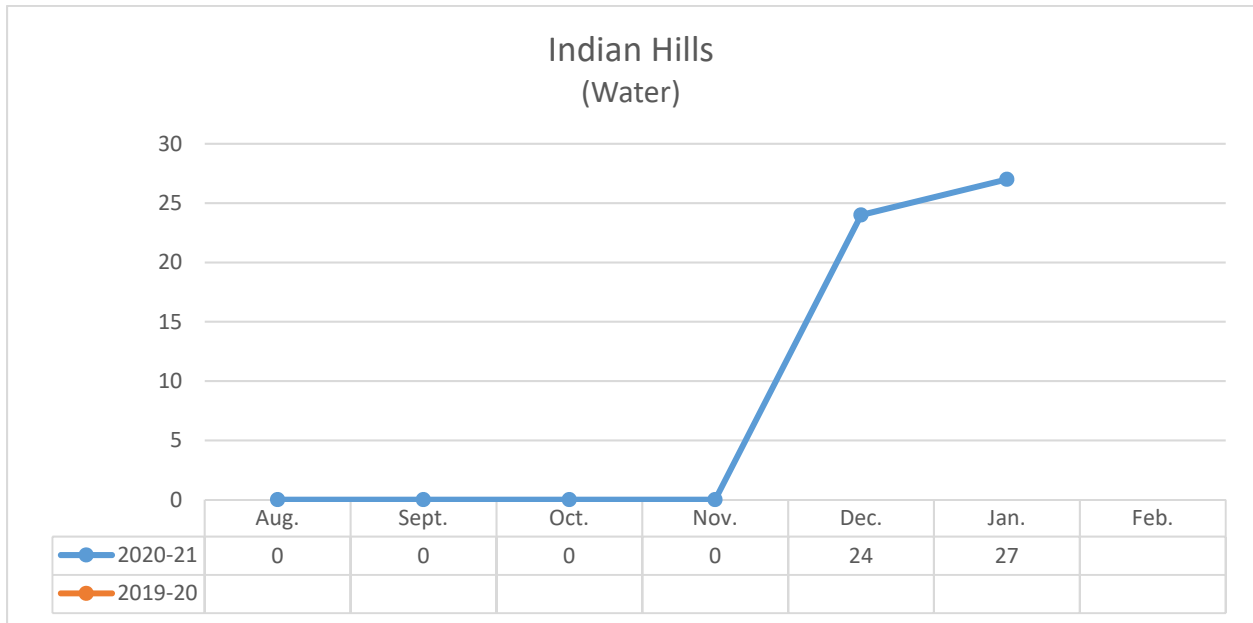
As shown in the previous graph, Indian Hills performed no disconnections in January 2021. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 6 disconnections was performed during this time period.

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”



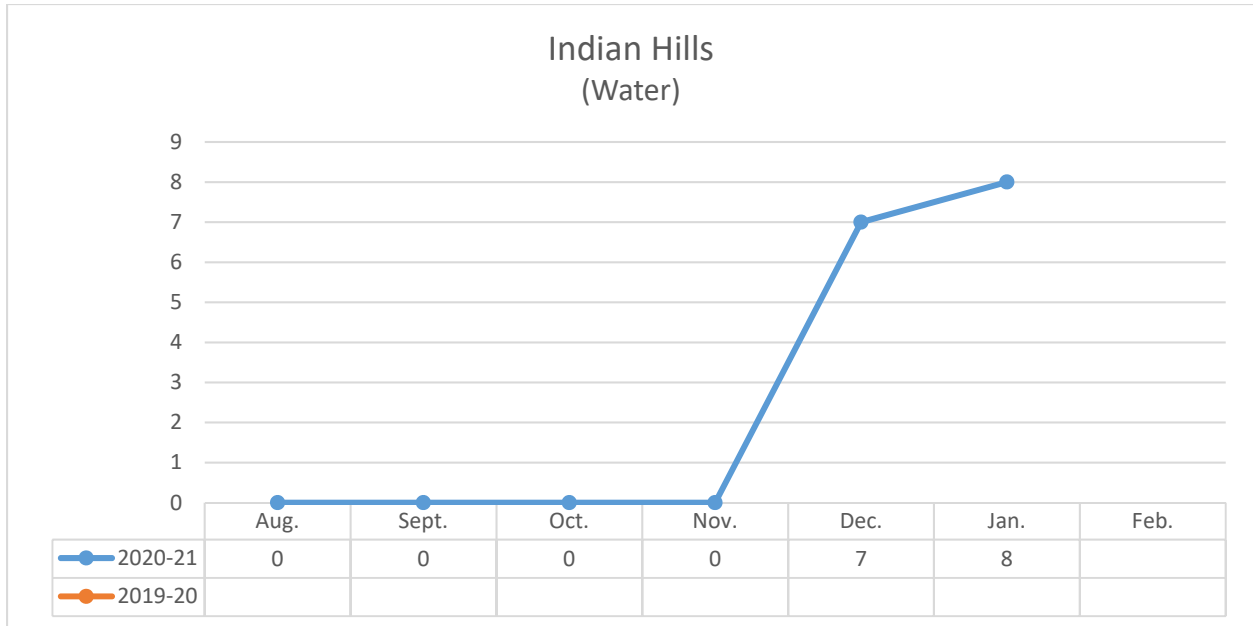
The previous data indicates there were about 13% more Indian Hills customers with past-due accounts in January 2021 versus December 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 11 customers with “past-due” accounts during this time period.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

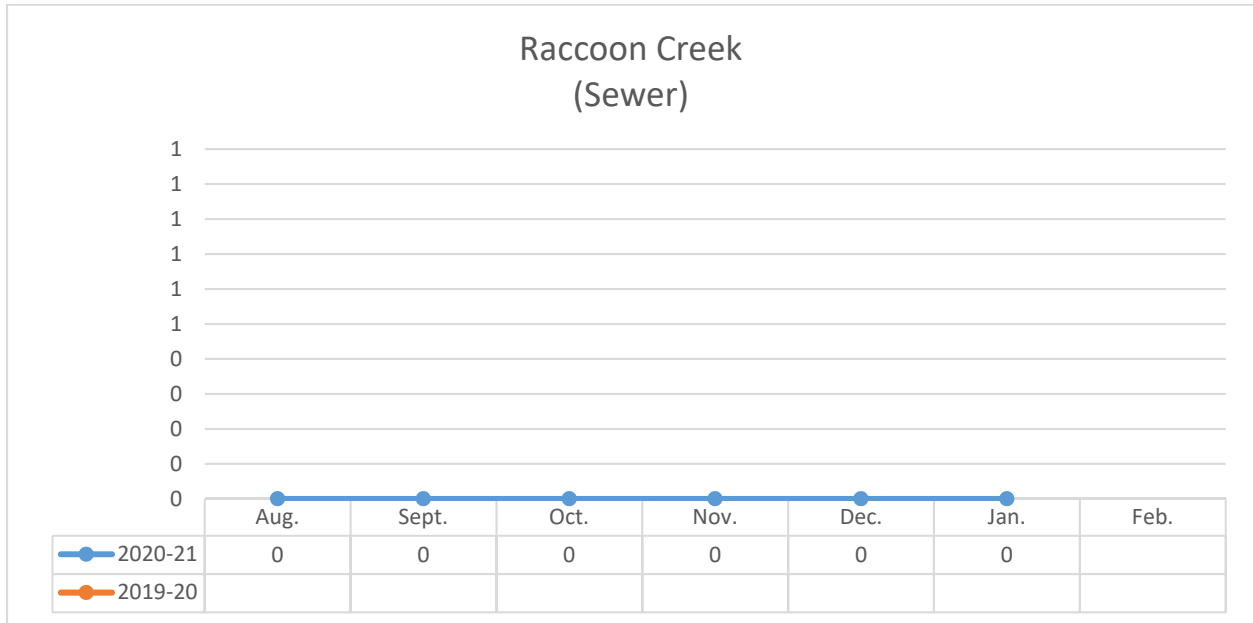
d) The number of customers at each month-end participating in payment plans



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.

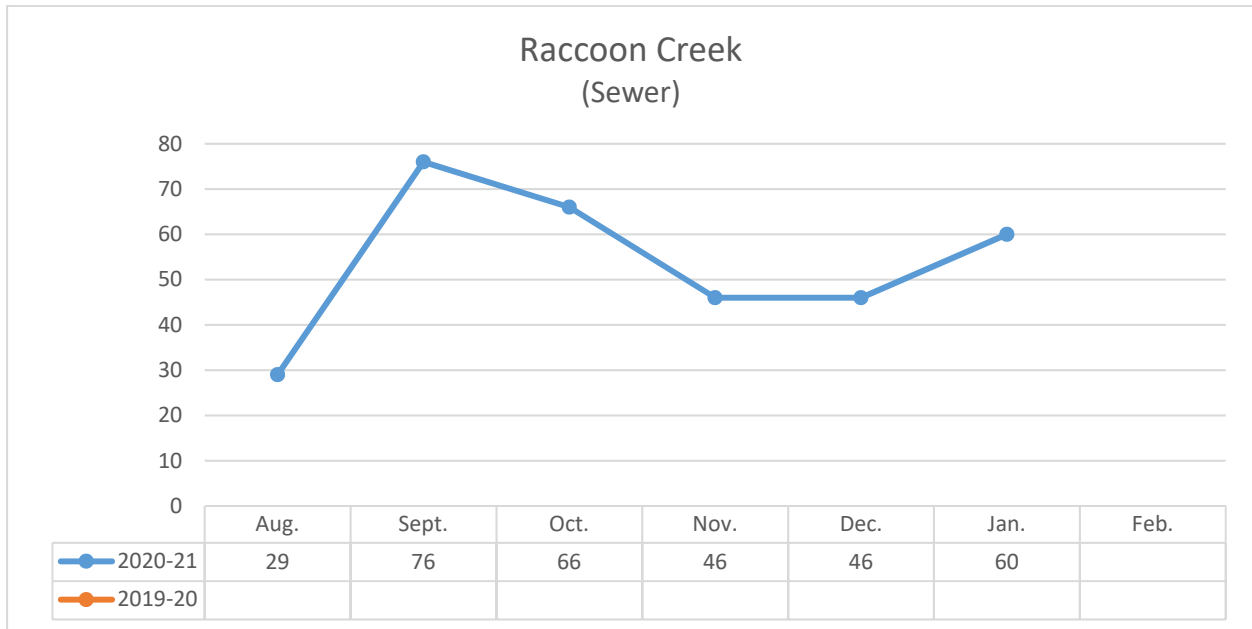
Questions 1 & 3 (Raccoon Creek - Sewer)

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



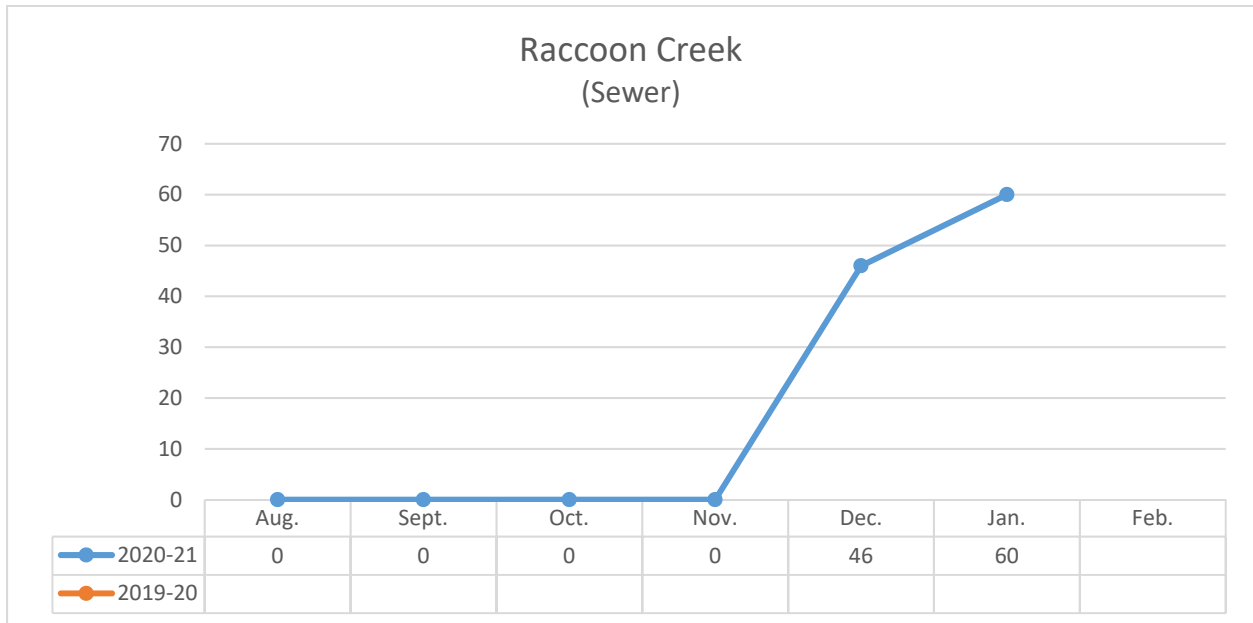
As shown in the previous graph, Raccoon Creek performed no disconnections in January 2021. No monthly, comparative data was provided for August 2019 to February 2020, although a total of one (1) disconnection was performed during this time period.

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”



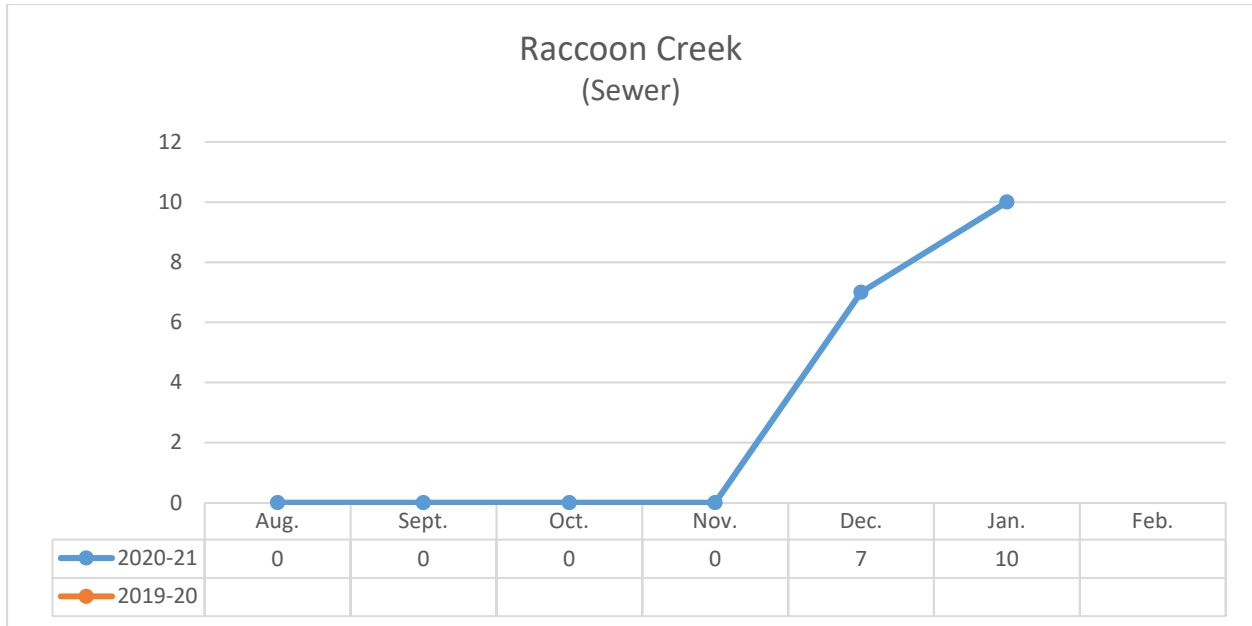
The previous data indicates there were about 30% more Raccoon Creek customers with past-due accounts in January 2021 versus December 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 3 customers with “past-due” accounts during this time period.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