

**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 AND
REQUEST FOR EXTENSION FOR REMAINING REPORTS**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its *Staff Report on Utility Data Request Responses and Motion for Extension for Remaining Reports* respectfully states as follows:

STAFF REPORT ON UTILITY DATA REQUEST RESPONSES

1. On August 19, 2020, the Commission issued its *Order Directing Staff to Gather Information about Utility Disconnections*, and directed Staff to gather information from the state’s utilities regarding current levels of disconnection for non-payment, anticipated levels of such disconnections by those utilities in the next six months, number of customers with past due accounts, number of customers that have received a final disconnection notice, and number of customers participating in payment plans.
2. As more thoroughly discussed in Staff’s Report, attached hereto as Appendix A, Staff has received updated information through the end of September 2020 from most of the state’s utilities, and now presents the data for the Commission’s review.
3. However, Staff did not receive timely responses from The Raytown Water Company; Confluence Rivers Utility Operating Company, Inc.; Elm Hills Utility Operating Company, Inc.; Hillcrest Utility Operating Company, Inc.; Indian Hills Utility Operating Company, Inc.; and Raccoon Creek Utility Operating Company, Inc. Staff has received data from the above companies for August 2020, and has included that data in this report.

Once received, the requested September 2020 data will be included in Staff's November report.

REQUEST FOR EXTENSION FOR REMAINING REPORTS

4. As Staff has received the responses from state utilities for this report, it has become clear that a filing by the 15th of every month gives Staff very little time to analyze and compile the data received.

5. Further, though the DRs submitted by Staff ask that state utilities respond by the 10th of each month, few have actually met that deadline.

6. In order for Staff to have the necessary time to fully analyze and compile the data in this working docket, Staff respectfully requests that the Commission extend the filing date for the remaining reports from the 15th of every month to the 22nd of every month.

WHEREFORE, Staff respectfully submits its report for the Commission's knowledge and consideration, and requests that the Commission extend the filing date for the remaining reports in this docket from the 15th of every month to the 22nd.

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 15th day of October, 2020.

/s/ Travis J. Pringle

MISSOURI PUBLIC SERVICE COMMISSION

STAFF REPORT



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

FILE NO. AW-2020-0356

OCTOBER 15, 2020

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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. This report represents the first such update, incorporating information through the end of September 2020 when available.

In response to the Order,¹ Staff submitted data requests to specific Missouri utilities listed below requesting the following information pertaining to the July and August 2020 billing cycles (providing clarification that “billing cycles” is defined as all billing cycles that are read in a calendar day in a given month):

- 1) (a) the number of disconnections for non-payment of services as of each month-end; (b) the number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due;” (c) the number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end; and (d) the number of customers at each month-end participating in payment plans. 2) Please provide your company’s estimate of the number of disconnections for non-payment of service for the six-month period of September 2020 through February 2021, with an explanation of the methodology and assumptions used to develop these projections. 3) Please provide the

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

same information requested in 1)(a) through 1)(d) applicable to your Company's August 2019 through February 2020 billing cycles.

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

The following utilities did not respond to the Staff data request with month-end September 2020 data in time to incorporate the information into this report: The Raytown Water Company ("Raytown Water"); Confluence Rivers Utility Operating Company, Inc. (Confluence Rivers – Water), Elm Hills Utility Operating Company, Inc. ("Elm Hills – Water"), Hillcrest Utility Operating Company, Inc. ("Hillcrest – Water"), Indian Hills Utility Operating Company, Inc. (Indian Hills – Water), and Raccoon Creek Utility Operating Company, Inc. ("Raccoon Creek – Sewer"). Information for these utilities will be provided through month-end August 2020 in this report and the month-end September 2020 data will be included in the updated November 2020 report.

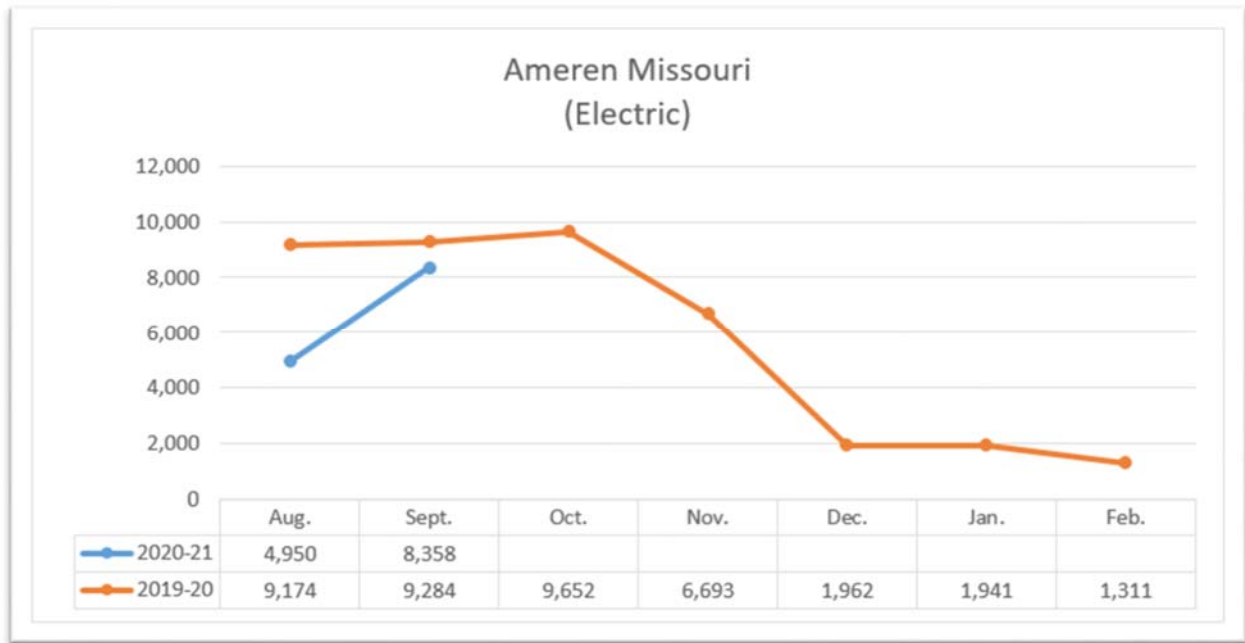
The following discussion presents the utilities' responses to Questions 1 and 3 in a series of graphs. This information is followed by tables providing the utilities' responses to Question 2.

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). This 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 September 2020 compared to August 2020).

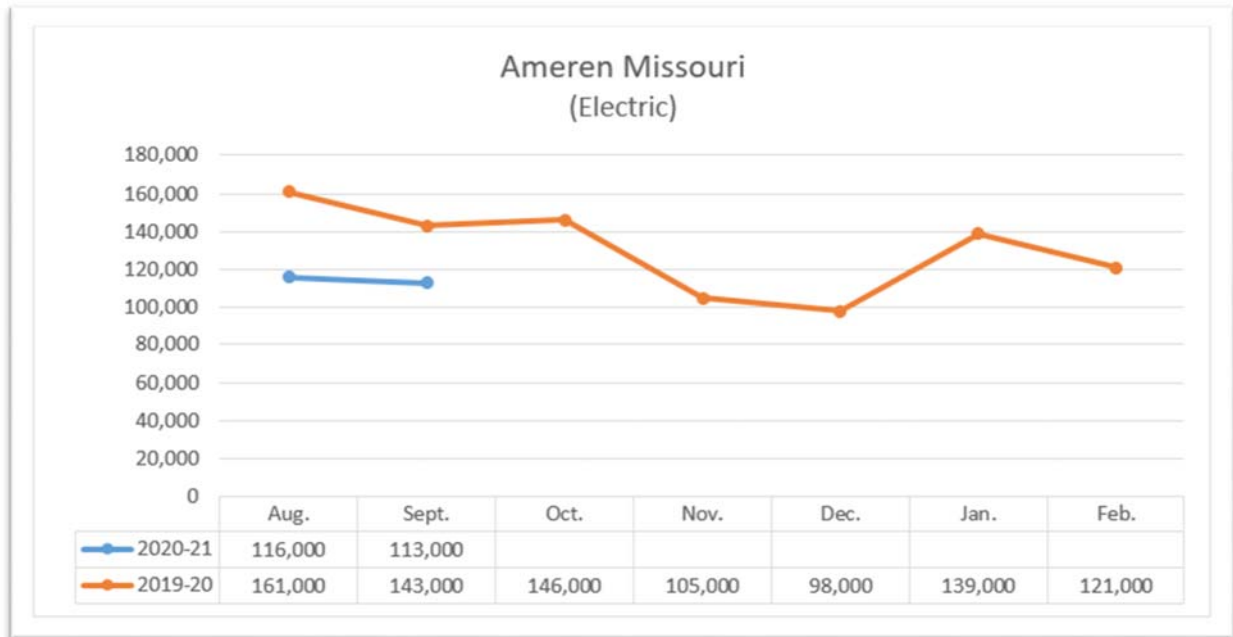
Questions 1 & 3 (Ameren Missouri – Electric)

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



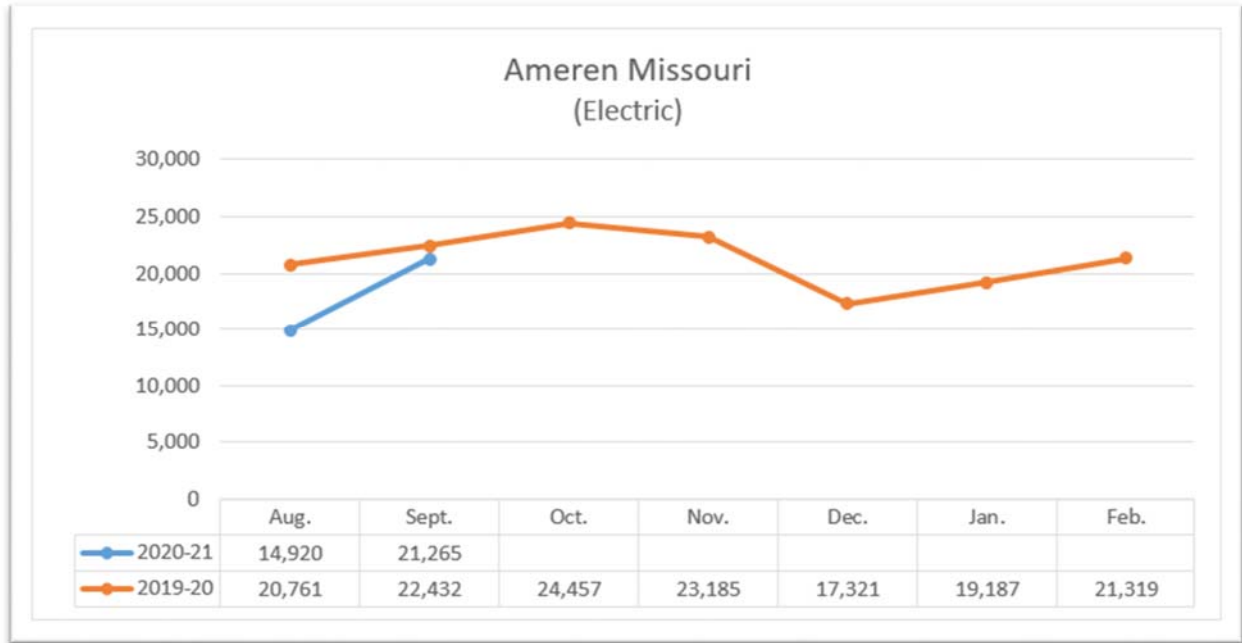
As shown in the previous graph, Ameren Missouri performed approximately 10% fewer disconnections for non-payment in September 2020 versus September 2019 and about 69% more in September 2020 than in August 2020.

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”



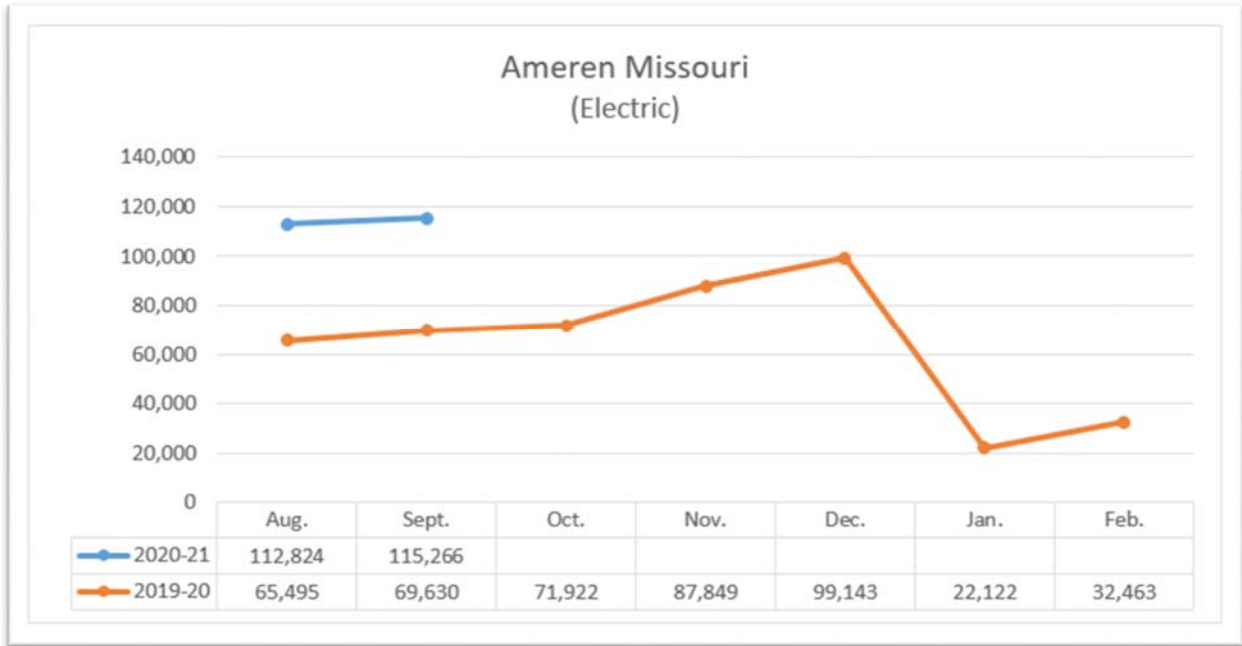
The previous data indicates that there were about 21% fewer Ameren Missouri customers with past-due accounts in September 2020 versus September 2019 and approximately 3% less in September 2020 than in August 2020. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

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 5% fewer customers who were not disconnected in September 2020 versus September 2019 and approximately 43% more in September 2020 than in August 2020.

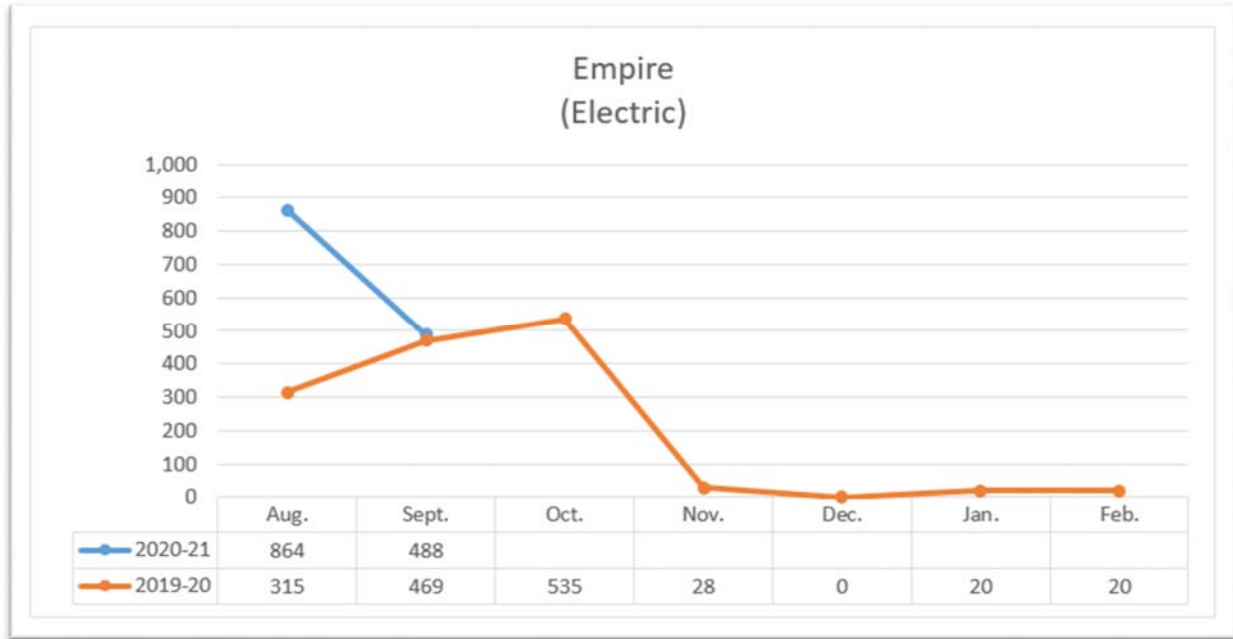
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 66% more Ameren Missouri customers who participated in payment plans in September 2020 versus September 2019 and about 2% more in September 2020 than in August 2020.

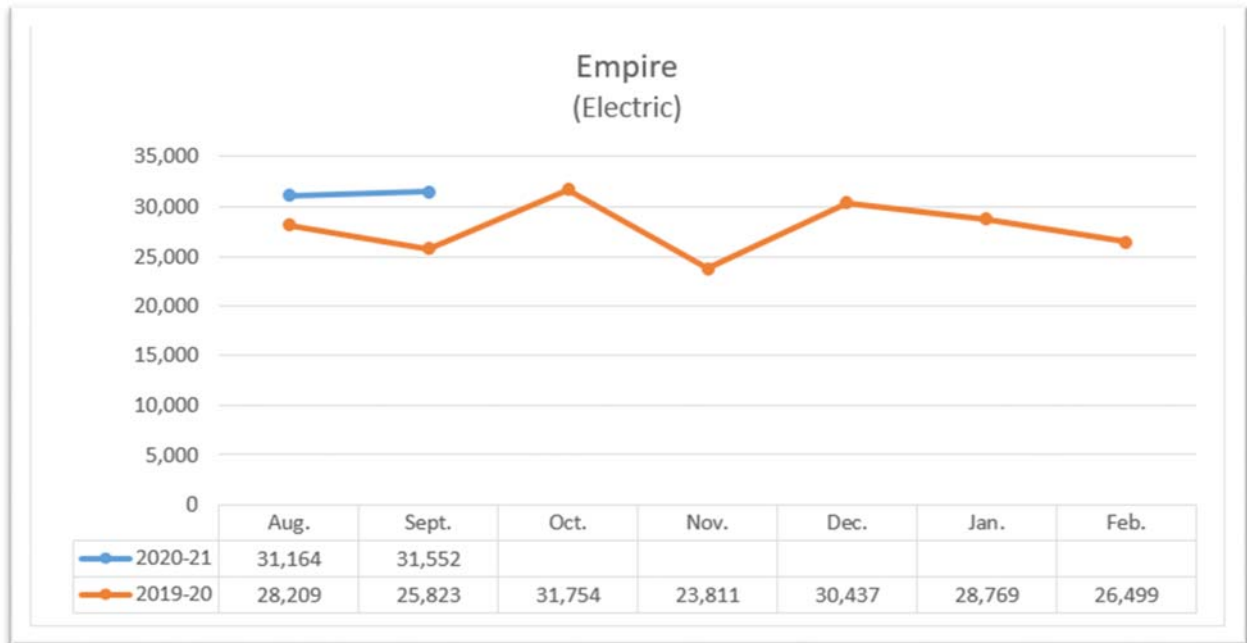
Questions 1 & 3 (Empire – Electric)

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



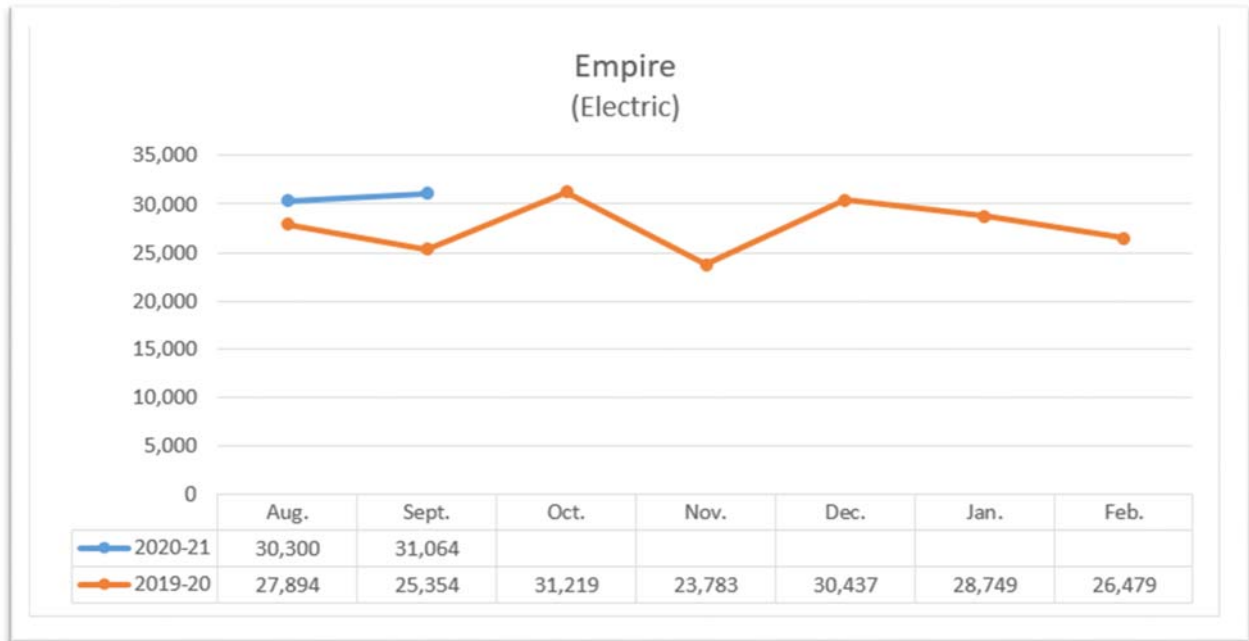
As shown in the previous graph, Empire performed approximately 4% more disconnections for non-payment in September 2020 versus September 2019 and about 44% fewer in September 2020 than in August 2020.

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”



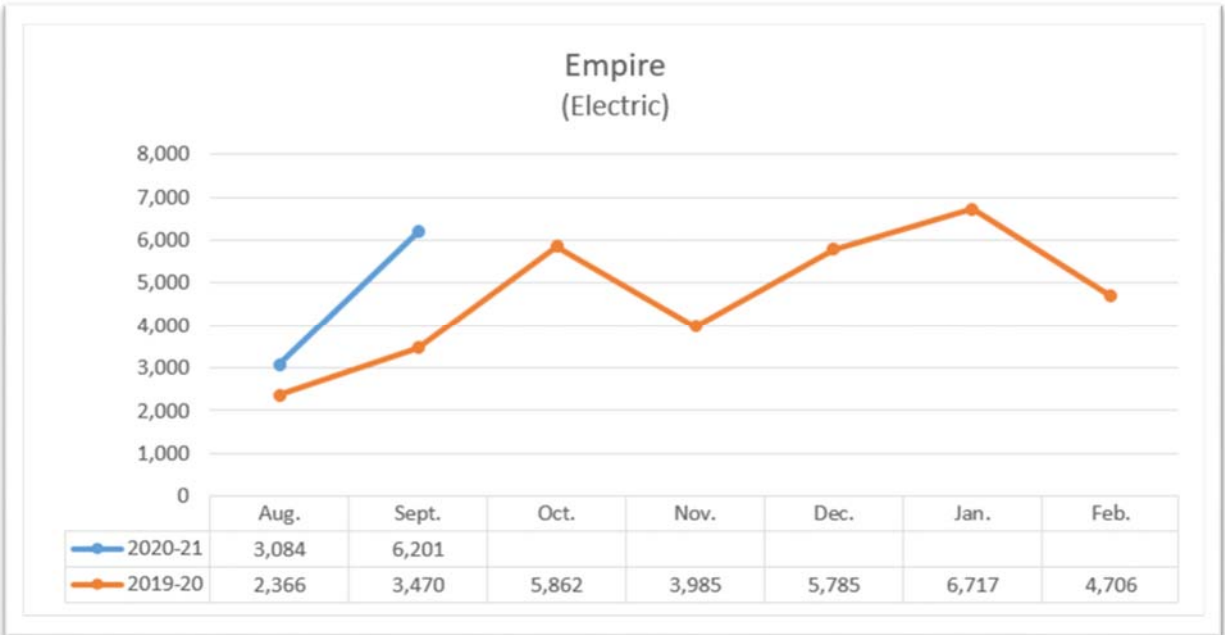
The previous data indicates that there were about 22% more Empire customers with past-due accounts in September 2020 versus September 2019 and approximately 1% more in September 2020 than in August 2020. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the 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 22% more customers who were not disconnected in September 2020 versus September 2019 and approximately 3% more in September 2020 than in August 2020.

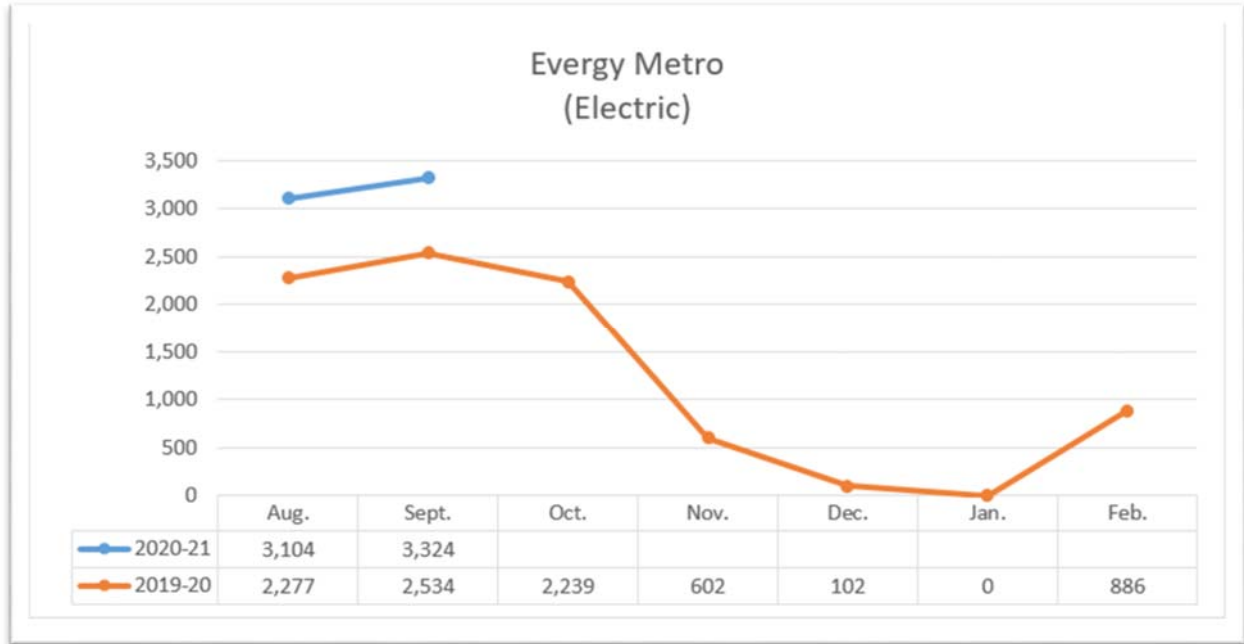
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 79% more Empire customers who participated in payment plans in September 2020 versus September 2019 and about 101% more in September 2020 than in August 2020.

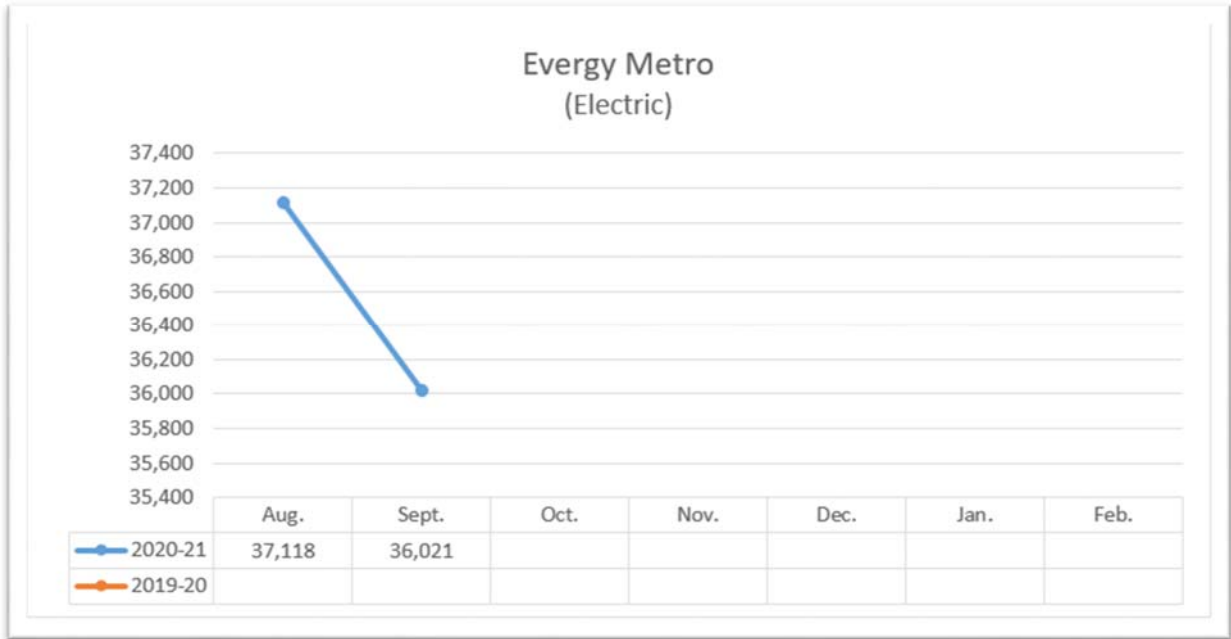
Questions 1 & 3 (Evergy Metro – Electric)

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



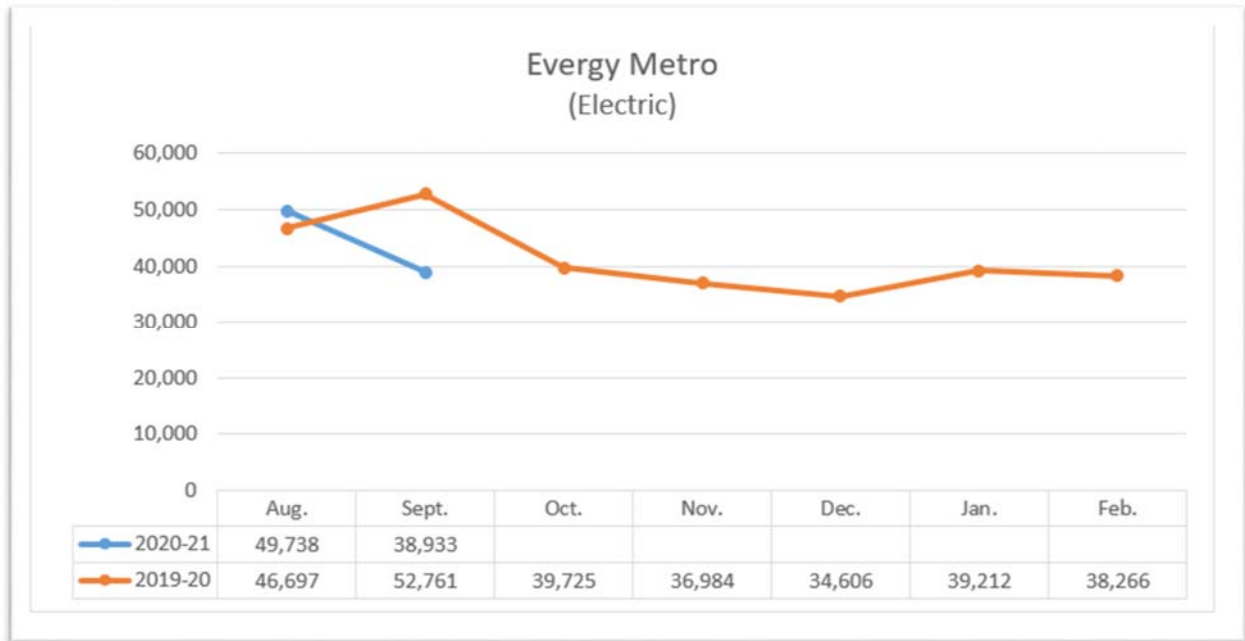
As shown in the previous graph, Evergy Metro performed approximately 31% more disconnections for non-payment in September 2020 versus September 2019 and about 7% more in September 2020 than in August 2020.

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”



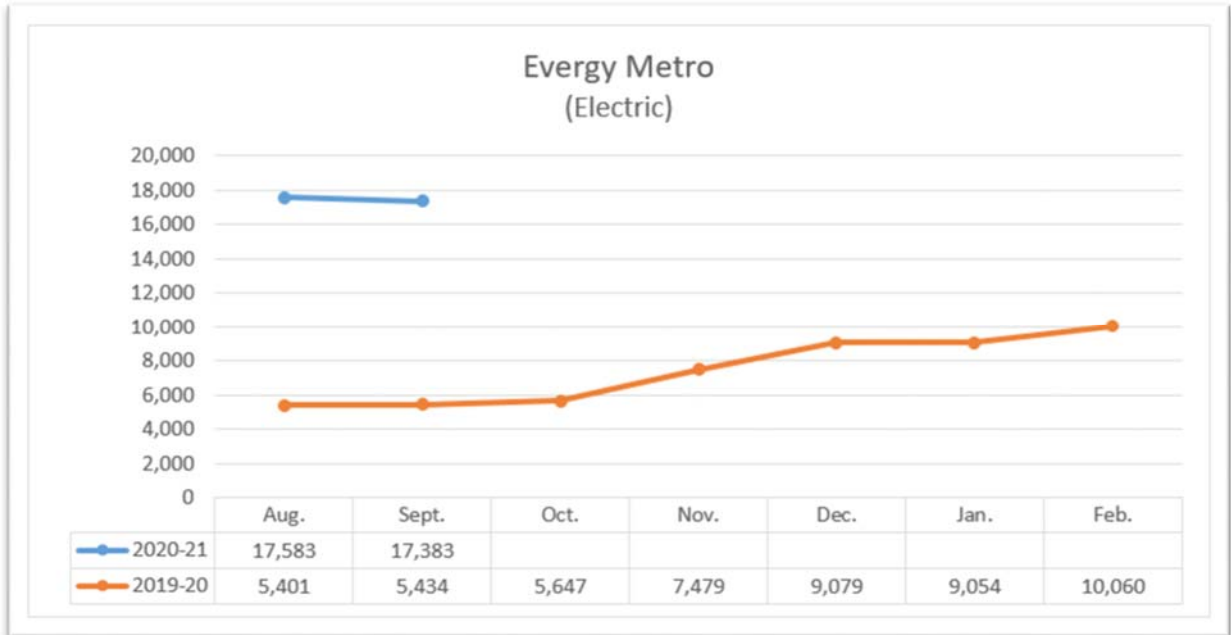
The previous data indicates that there were about 3% fewer Evergy Metro customers with past-due accounts in September 2020 versus August 2020. Evergy Metro indicated it is unable to provide comparable past-due data for August 2019 to February 2020. Evergy Metro defines past-due accounts as accounts that are more than 30 days in arrears.

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



As shown by Evergy Metro's data, for those customers who received a final disconnection notice there were about 26% fewer customers who were not disconnected in September 2020 versus September 2019 and approximately 22% less in September 2020 than in August 2020.

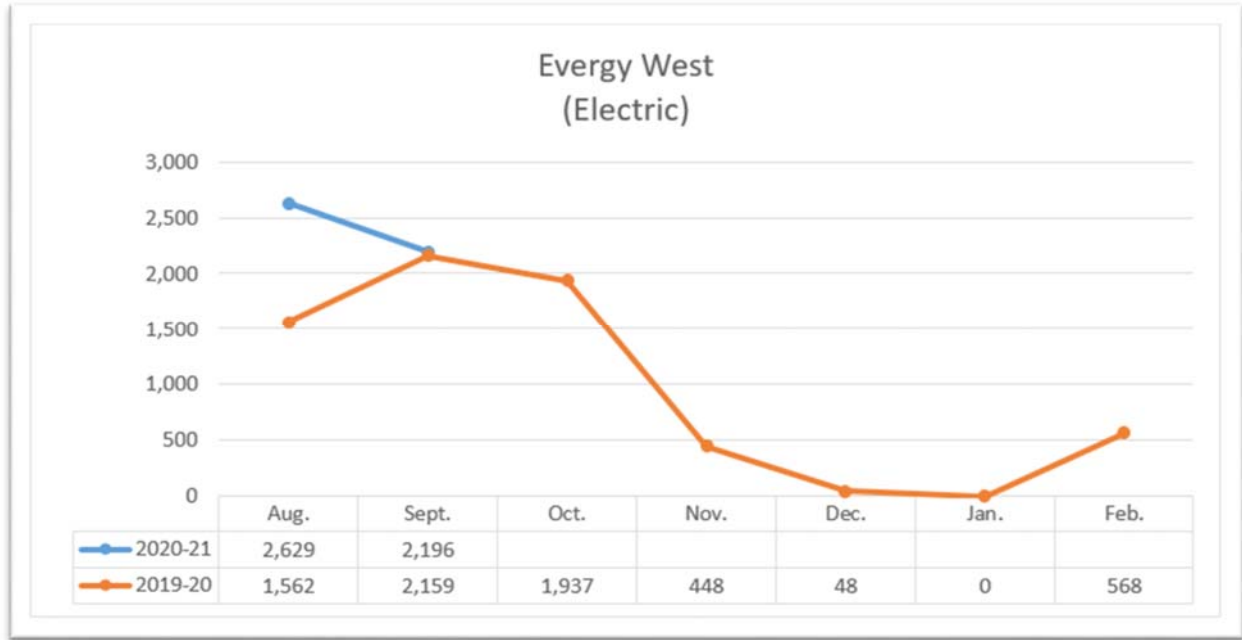
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 220% more Evergy Metro customers who participated in payment plans in September 2020 versus September 2019 and about 1% less in September 2020 than in August 2020.

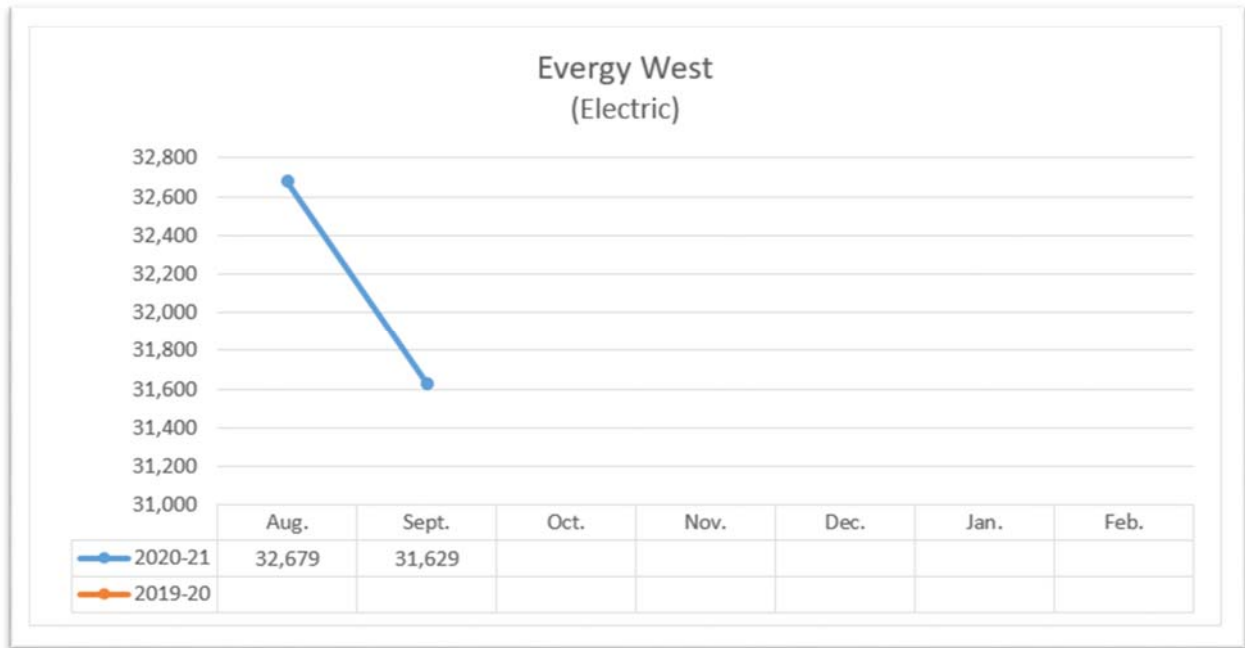
Questions 1 & 3 (Evergy West – Electric)

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



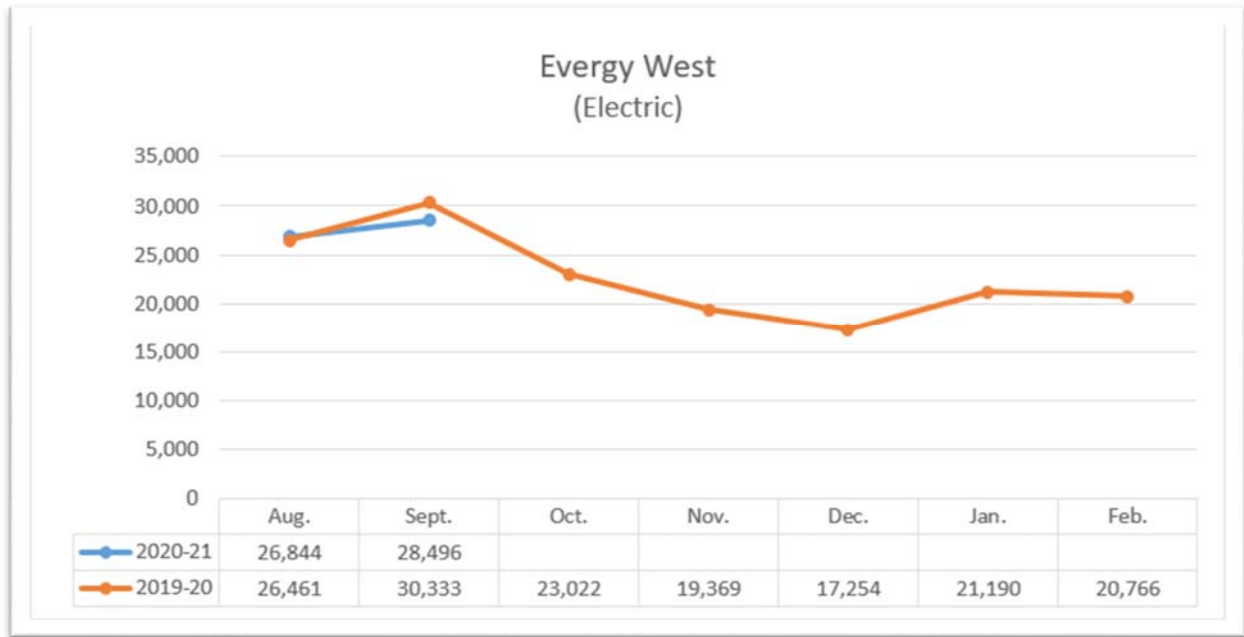
As shown in the previous graph, Evergy West performed approximately 2% more disconnections for non-payment in September 2020 versus September 2019 and about 17% fewer in September 2020 than in August 2020.

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”



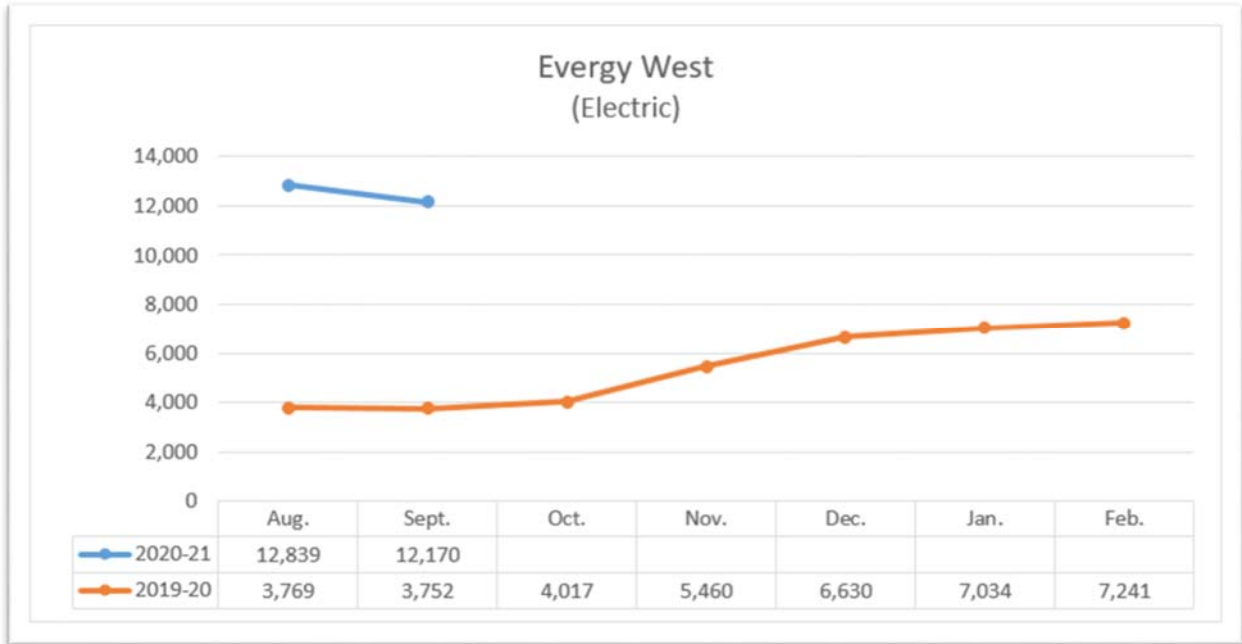
The previous data indicates that there were about 3% fewer Evergy West customers with past-due accounts in September 2020 versus August 2020. Evergy West indicated it is unable to provide comparable past-due data for August 2019 to February 2020. Evergy West defines past-due accounts as accounts that are more than 30 days in arrears.

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



As shown by Evergy West’s data, for those customers who received a final disconnection notice there were about 6% fewer customers who were not disconnected in September 2020 versus September 2019 and approximately 6% more in September 2020 than in August 2020.

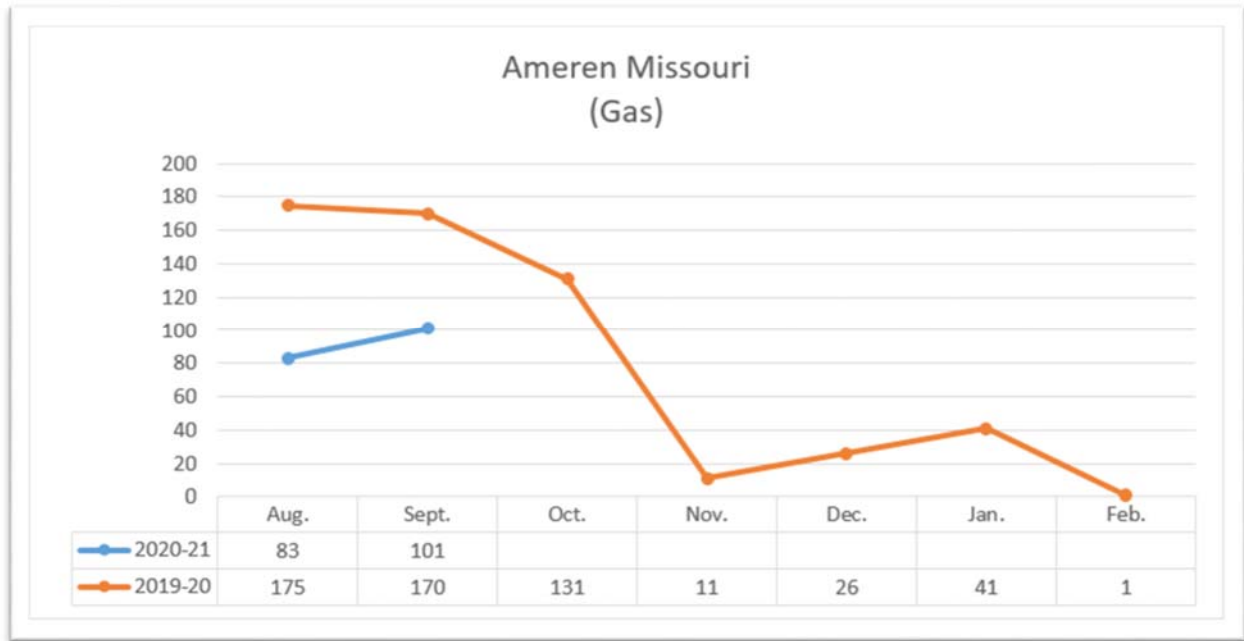
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 224% more Evergy West customers who participated in payment plans in September 2020 versus September 2019 and about 5% less in September 2020 than in August 2020.

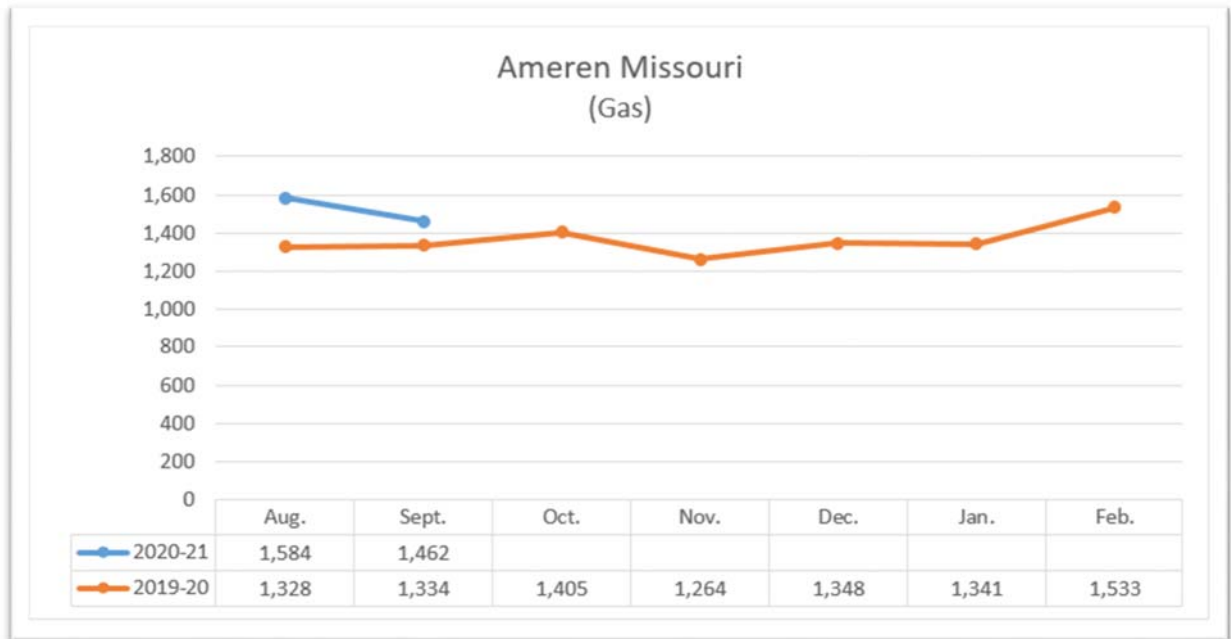
Questions 1 & 3 (Ameren Missouri – Gas)

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



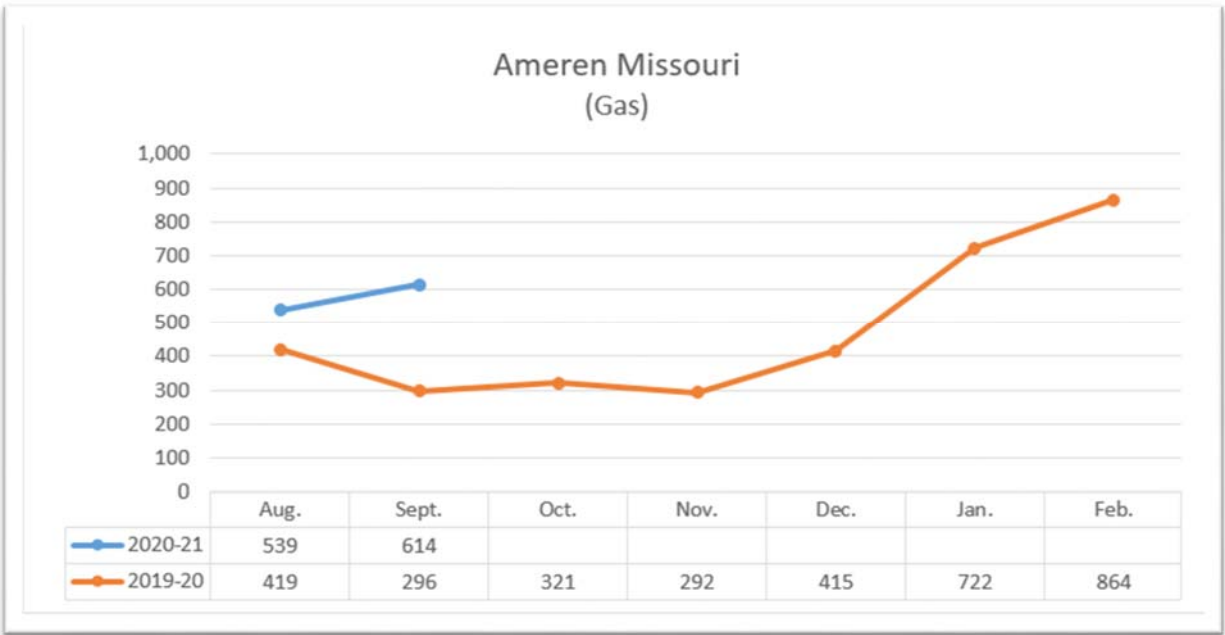
As shown in the previous graph, Ameren Missouri performed approximately 41% fewer disconnections for non-payment in September 2020 versus September 2019 and about 22% more in September 2020 than in August 2020.

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



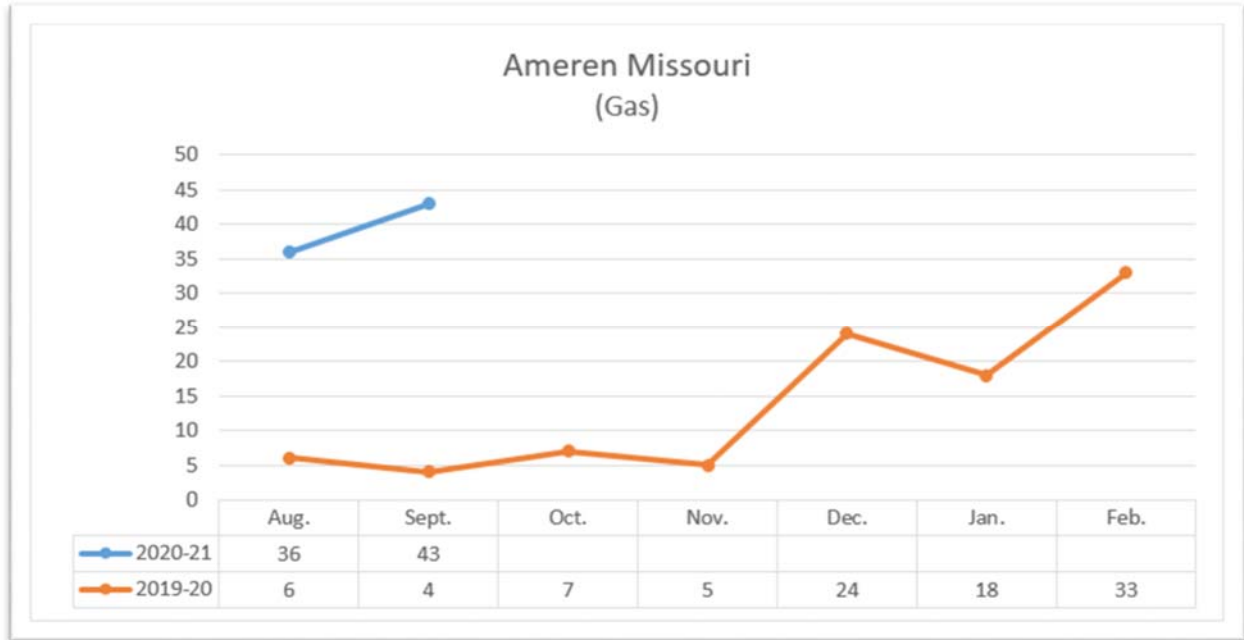
The previous data indicates that there were about 10% more Ameren Missouri customers with past-due accounts in September 2020 versus September 2019 and about 8% less in September 2020 than in August 2020. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

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 107% more customers who were not disconnected in September 2020 versus September 2019 and about 14% more in September 2020 than in August 2020.

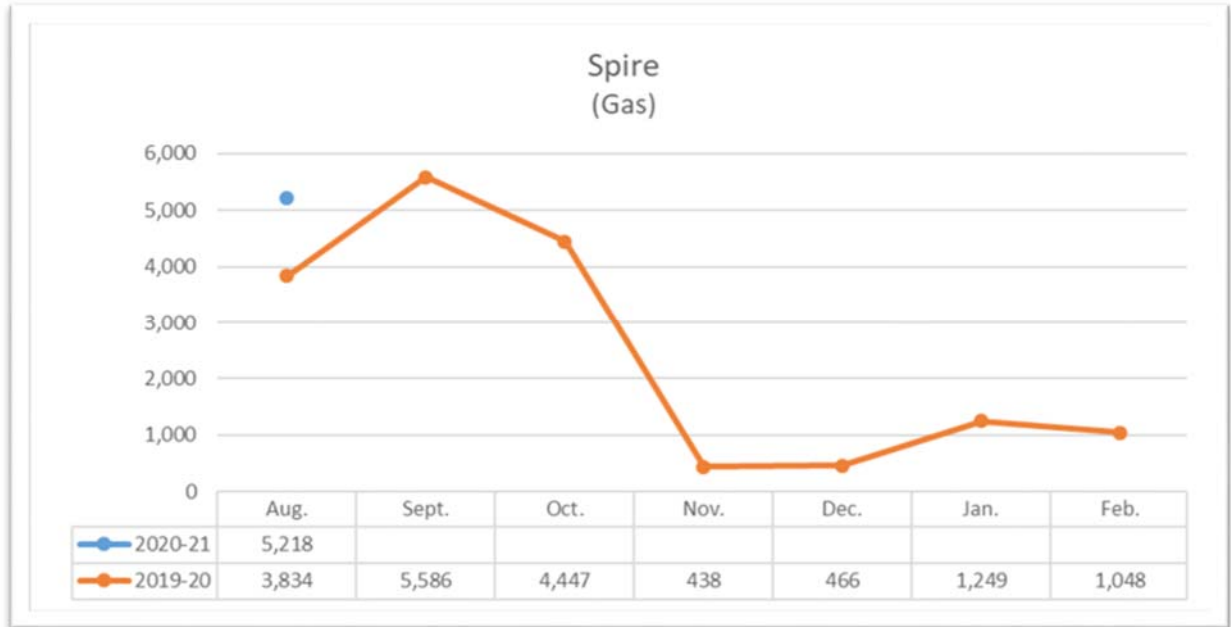
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 975% more Ameren Missouri customers who participated in payment plans in September 2020 versus September 2019 and about 19% more in September 2020 than in August 2020.

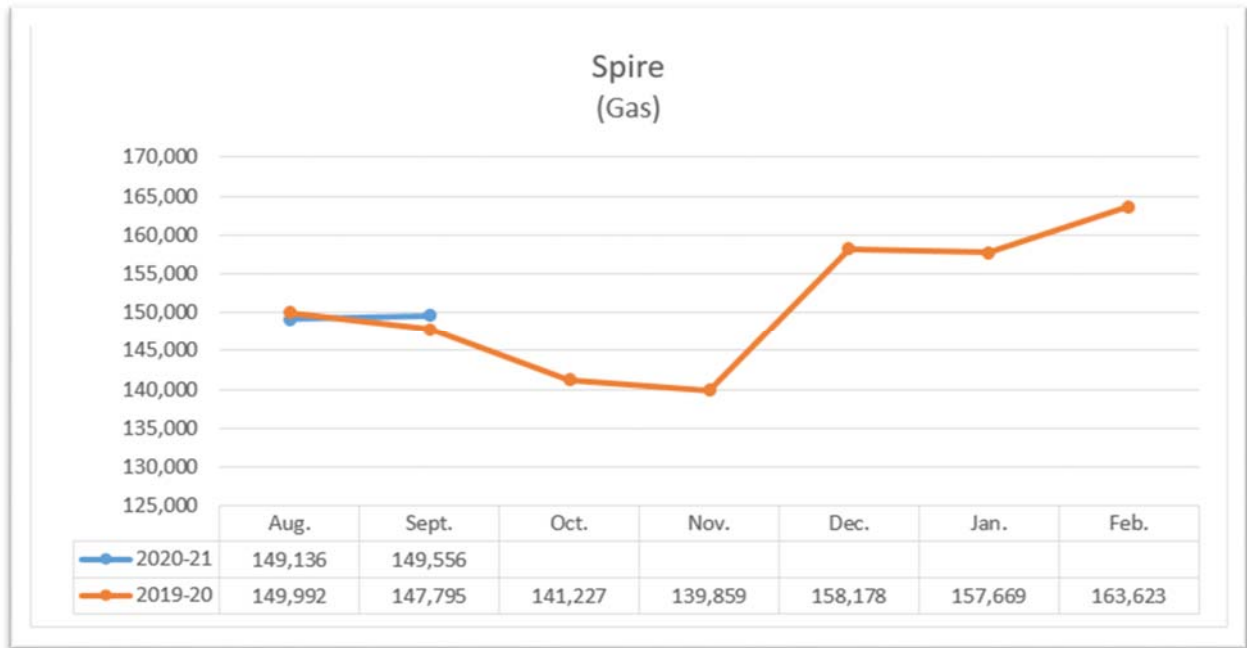
Questions 1 & 3 (Spire - Gas)

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



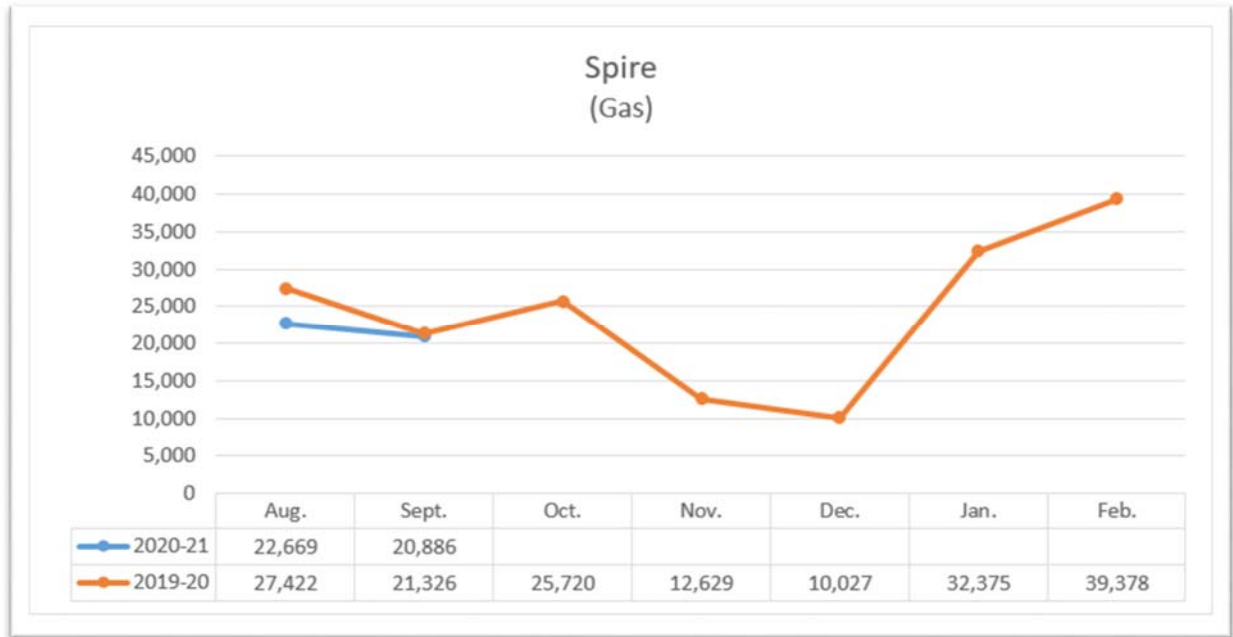
As shown in the previous graph, Spire performed approximately 36% more disconnections for non-payment in August 2020 versus August 2019. Spire did not report the number of disconnections for non-payment for September 2020.

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”



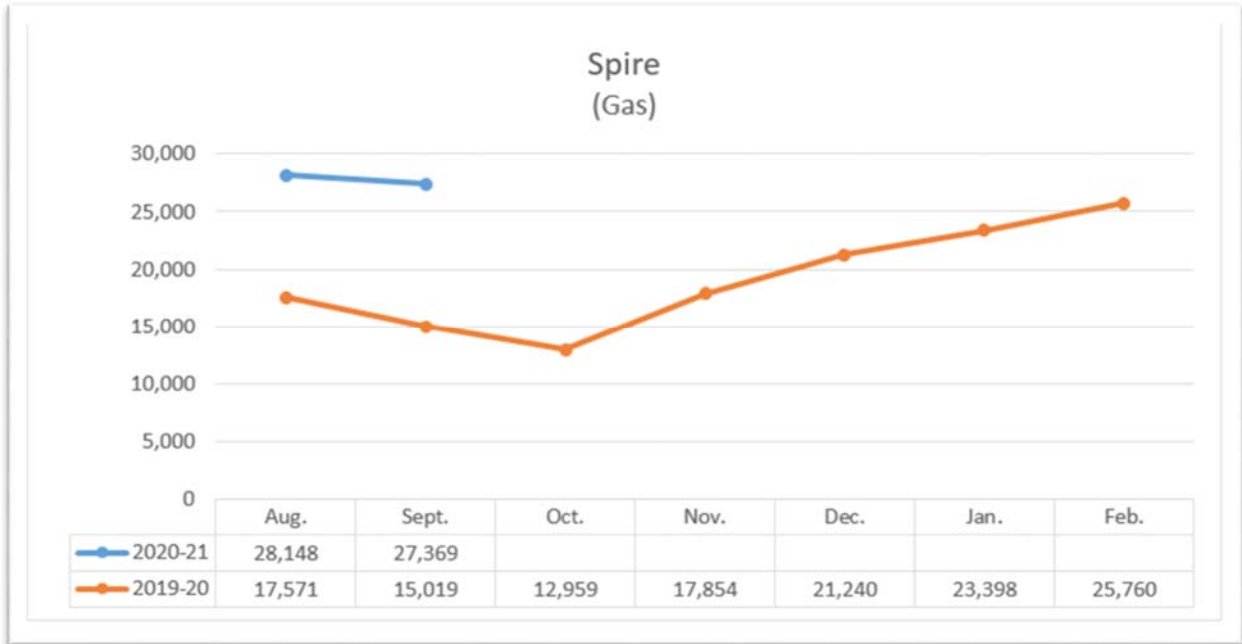
The previous data indicates that there were about 1% more Spire customers with past-due accounts in September 2020 versus September 2019 and approximately 0.3% more in September 2020 than in August 2020. Spire reported that past-due accounts are defined as accounts with arrear amounts owed for over 30 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 2% fewer customers who were not disconnected in September 2020 versus September 2019 and approximately 8% less in September 2020 than in August 2020.

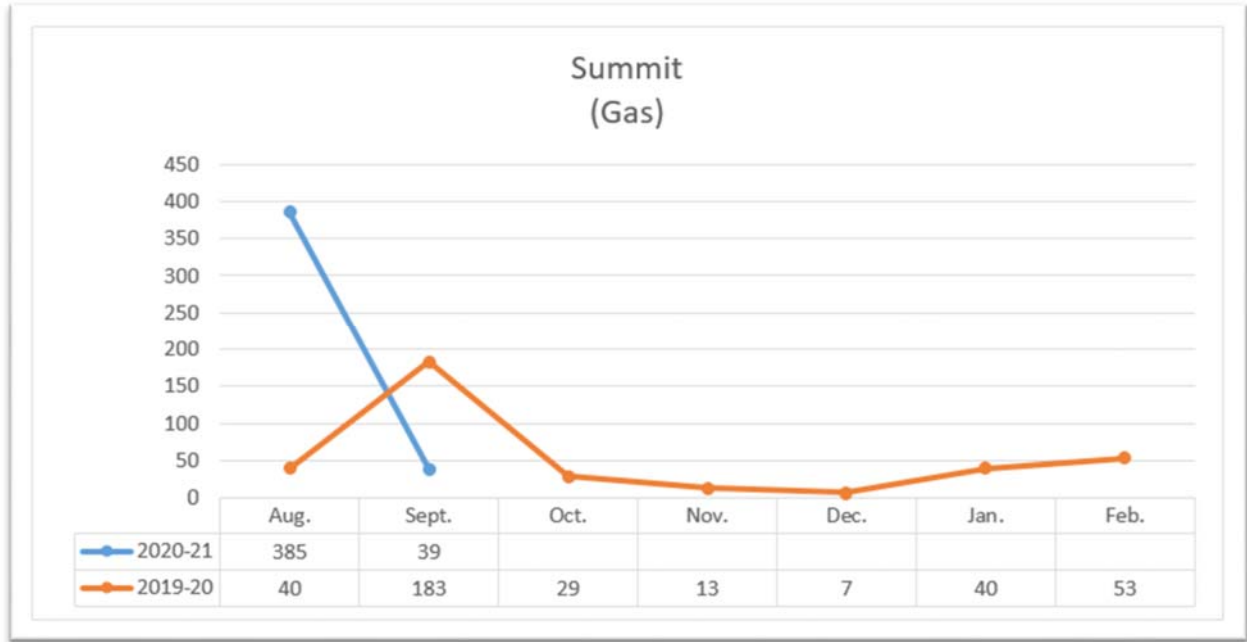
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 82% more Spire customers who participated in payment plans in September 2020 versus September 2019 and about 3% less in September 2020 than in August 2020.

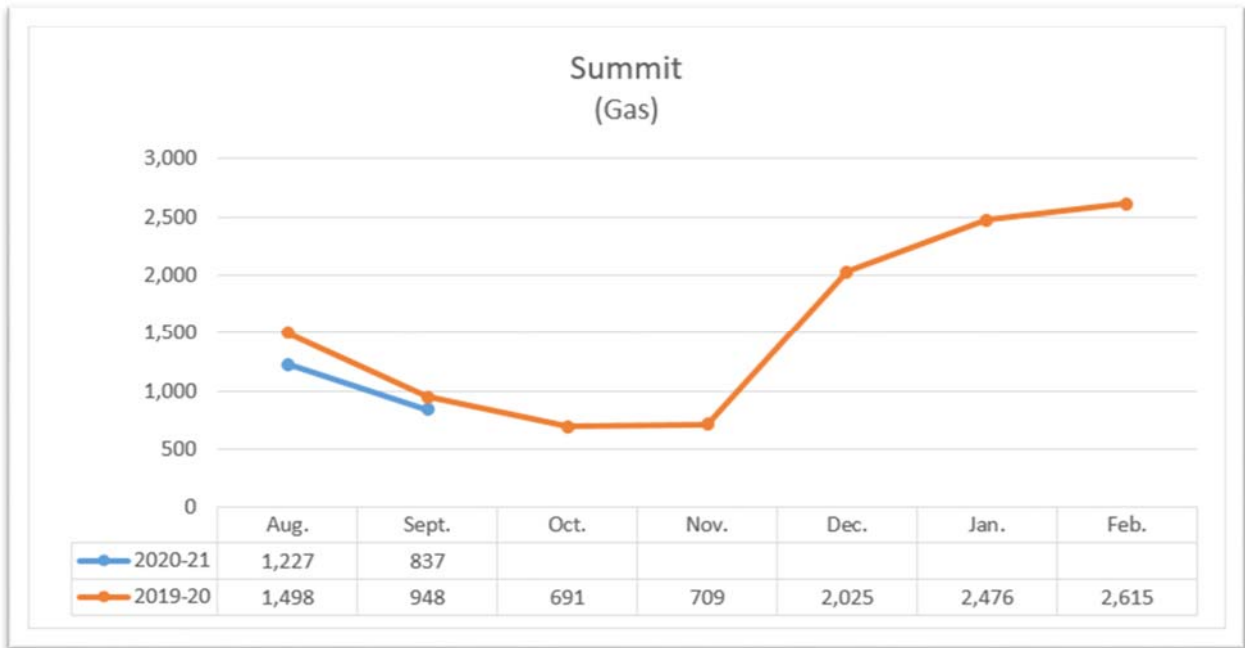
Questions 1 & 3 (Summit - Gas)

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



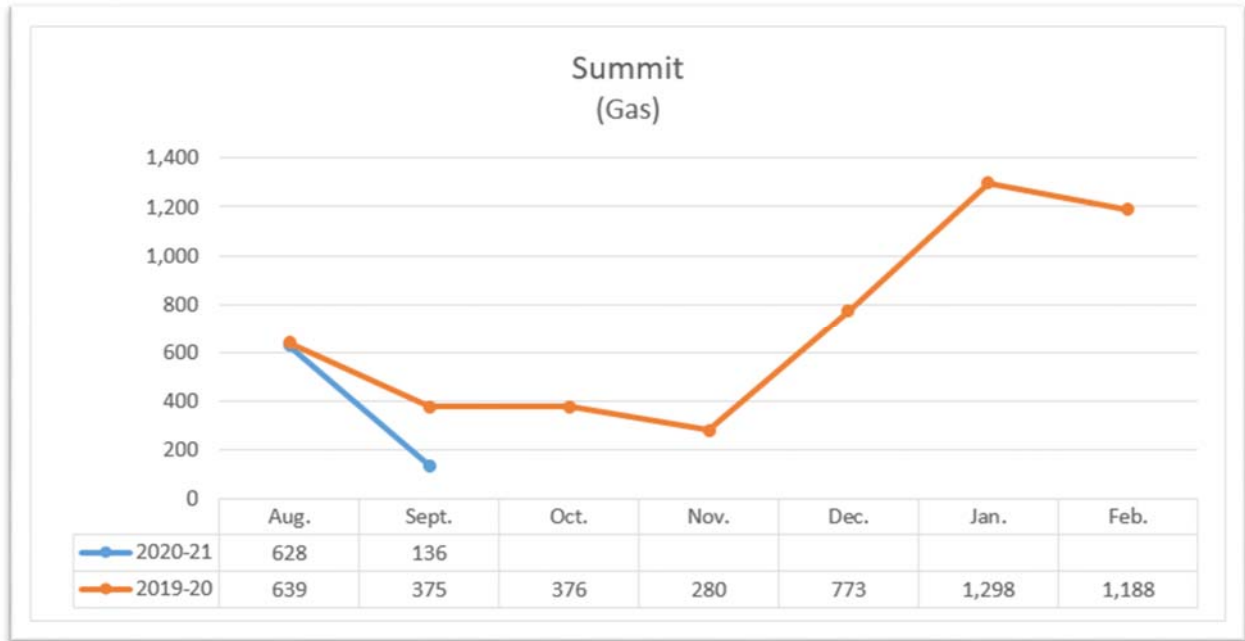
As shown in the previous graph, Summit performed approximately 79% fewer disconnections for non-payment in September 2020 versus September 2019 and about 90% less in September 2020 than in August 2020.

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”



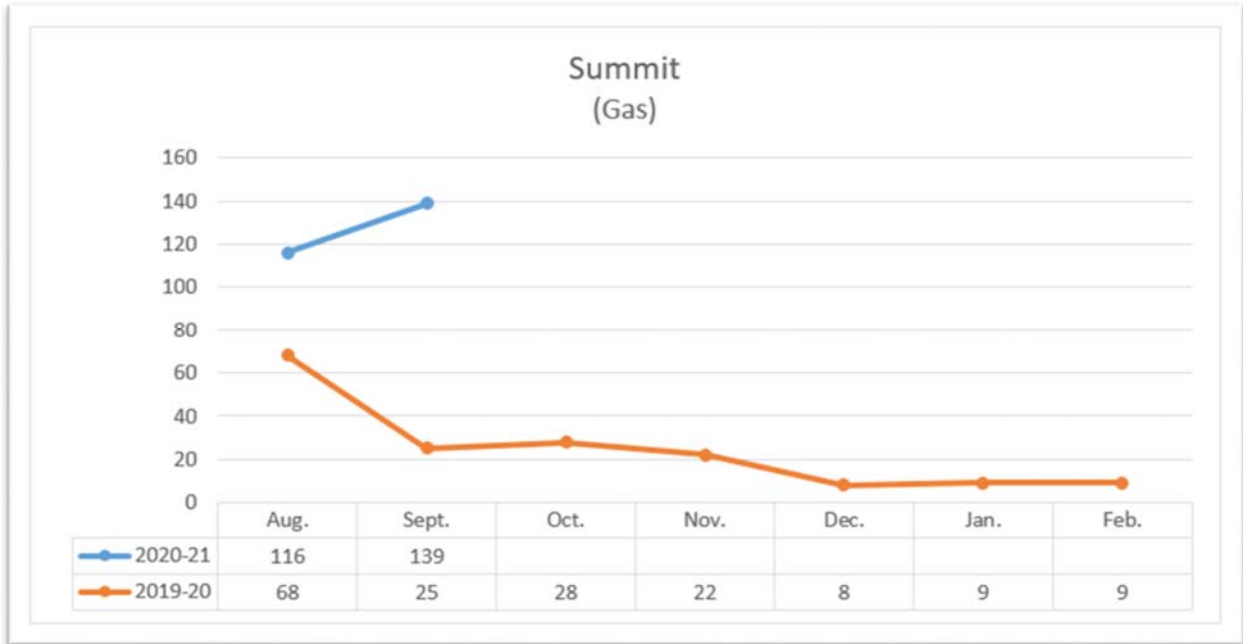
The previous data indicates that there were about 12% fewer Summit customers with past-due accounts in September 2020 versus September 2019 and approximately 32% less in September 2020 than in August 2020. Summit did not respond how it defines past-due accounts.

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 64% fewer customers who were not disconnected in September 2020 versus September 2019 and approximately 78% less in September 2020 than in August 2020.

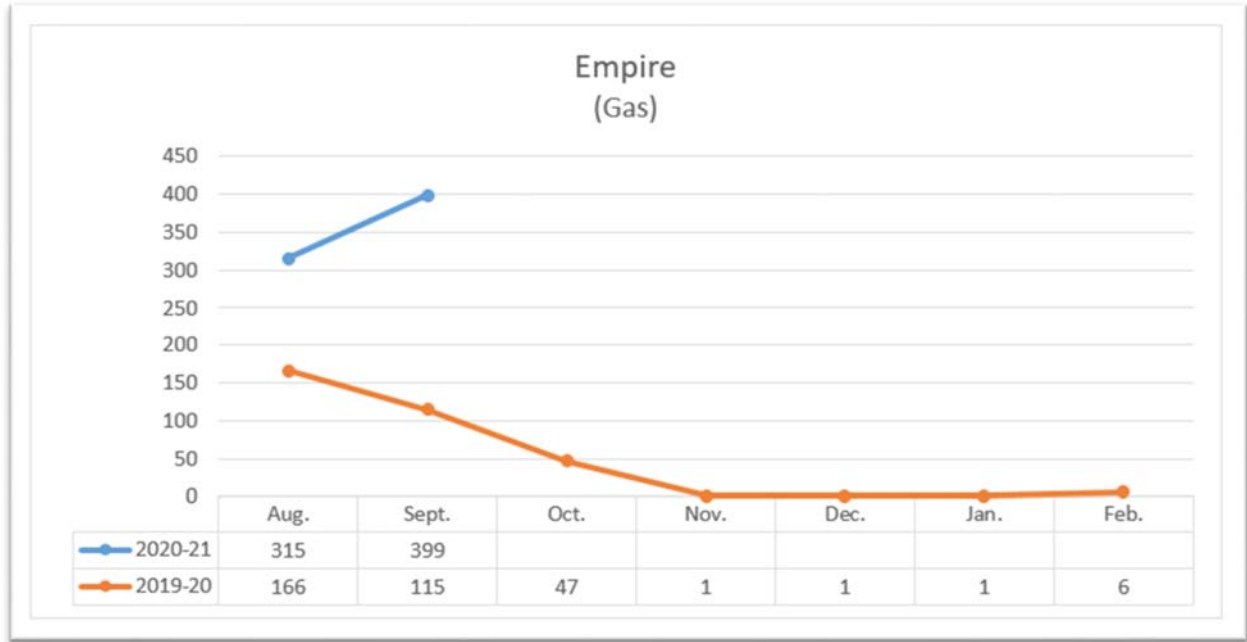
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 456% more Summit customers who participated in payment plans in September 2020 versus September 2019 and about 20% more in September 2020 than in August 2020.

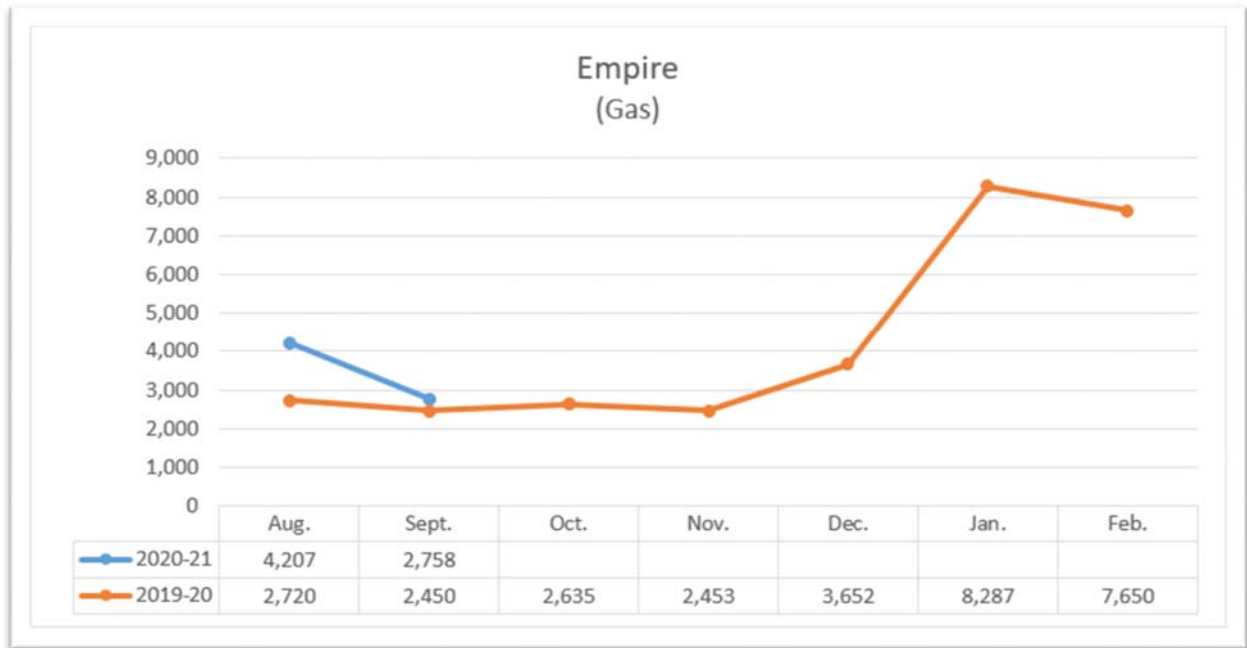
Questions 1 & 3 (Empire - Gas)

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



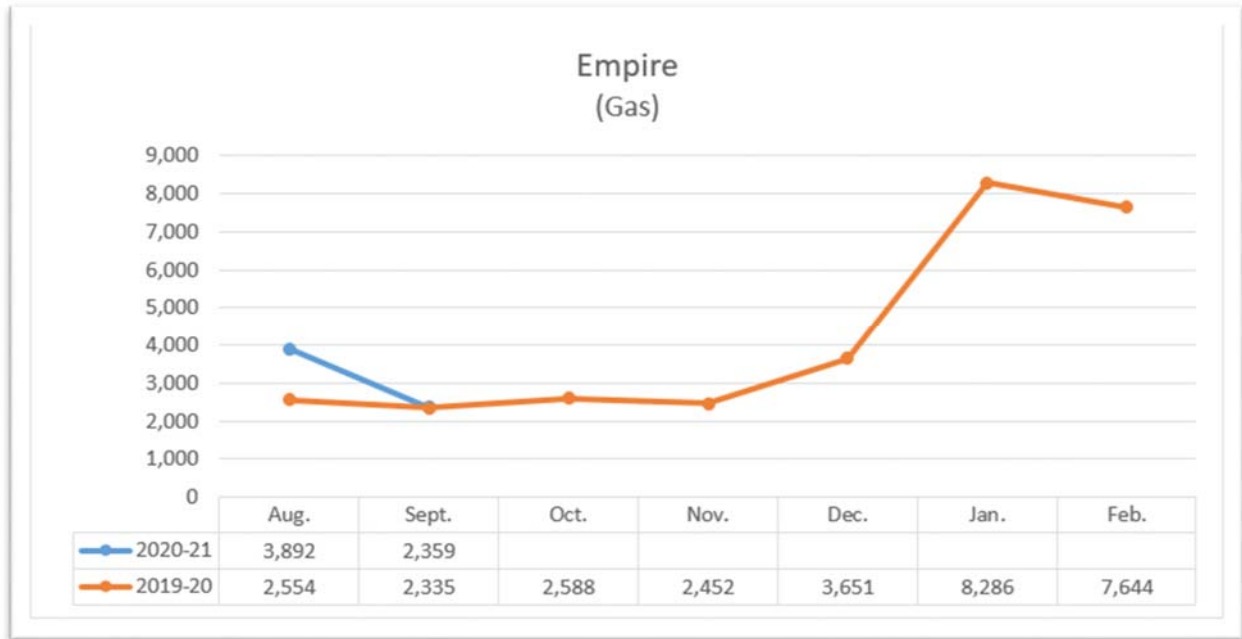
As shown in the previous graph, Empire performed approximately 247% more disconnections for non-payment in September 2020 versus September 2019 and about 27% more in September 2020 than in August 2020.

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”



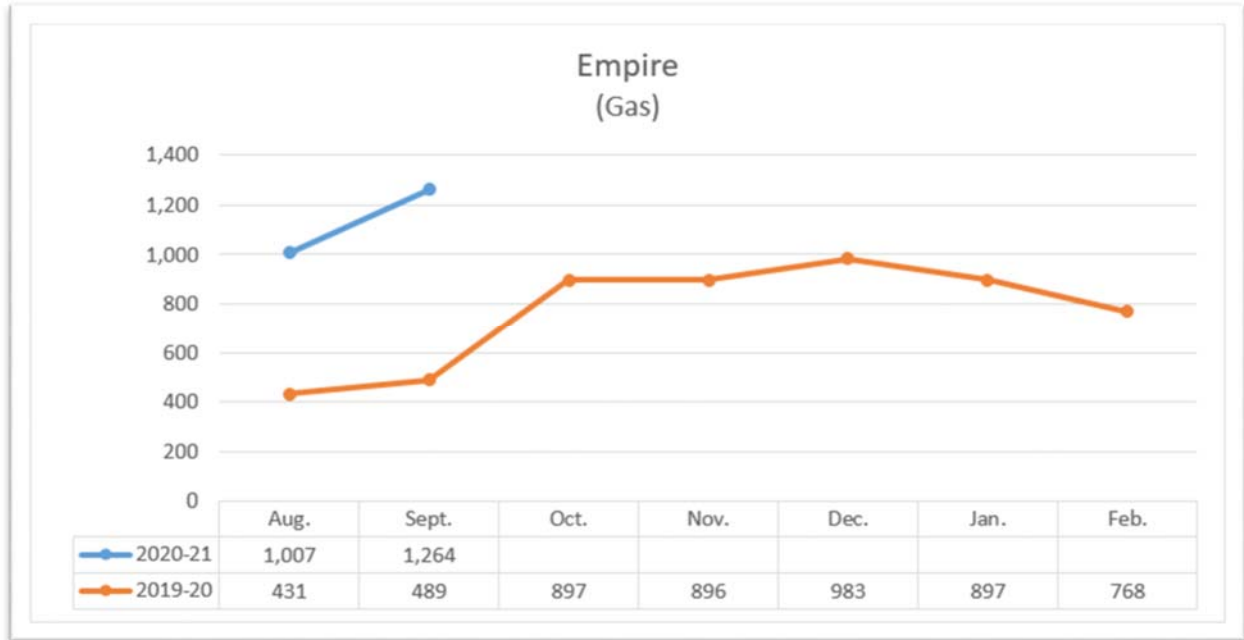
The previous data indicates that there were about 13% more Empire customers with past-due accounts in September 2020 versus September 2019 and approximately 34% less in September 2020 than in August 2020. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the 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 1% more customers who were not disconnected in September 2020 versus September 2019 and approximately 39% less in September 2020 than in August 2020.

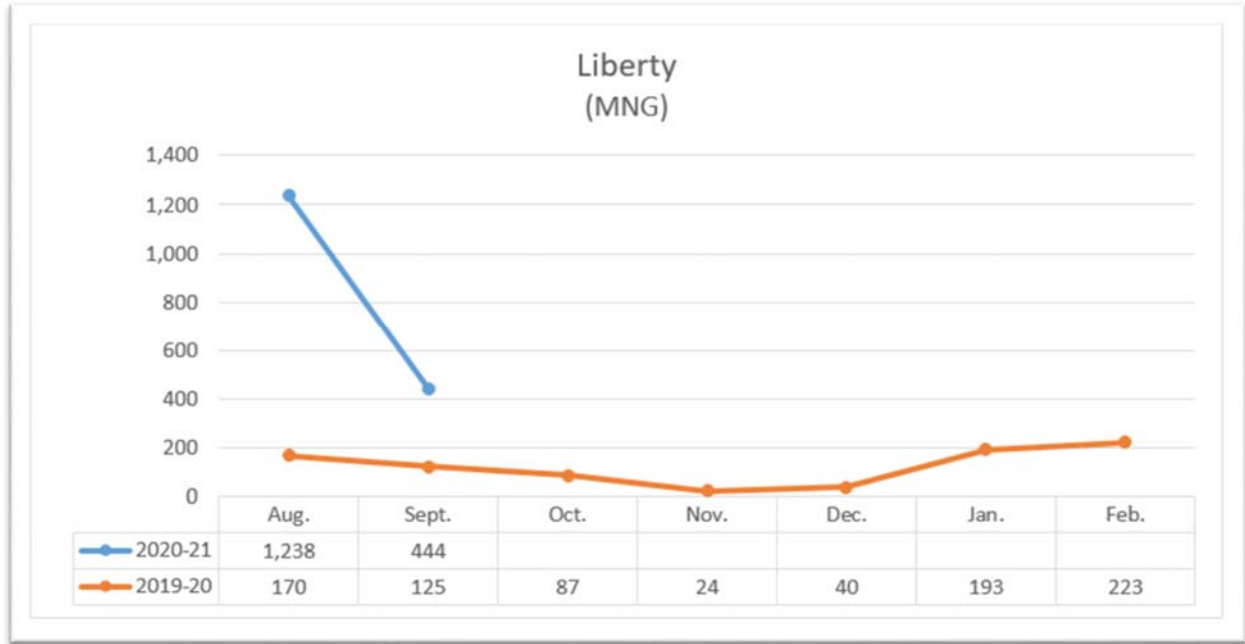
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 158% more Empire customers who participated in payment plans in September 2020 versus September 2019 and about 26% more in September 2020 than in August 2020.

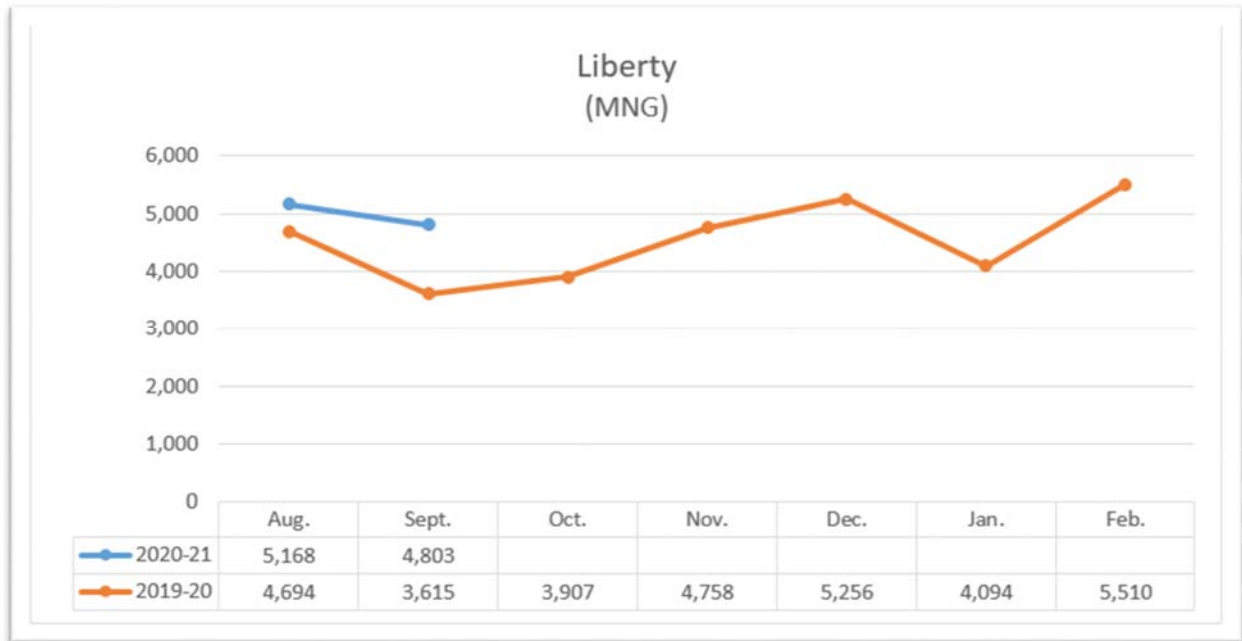
Questions 1 & 3 (Liberty - MNG - Gas)

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



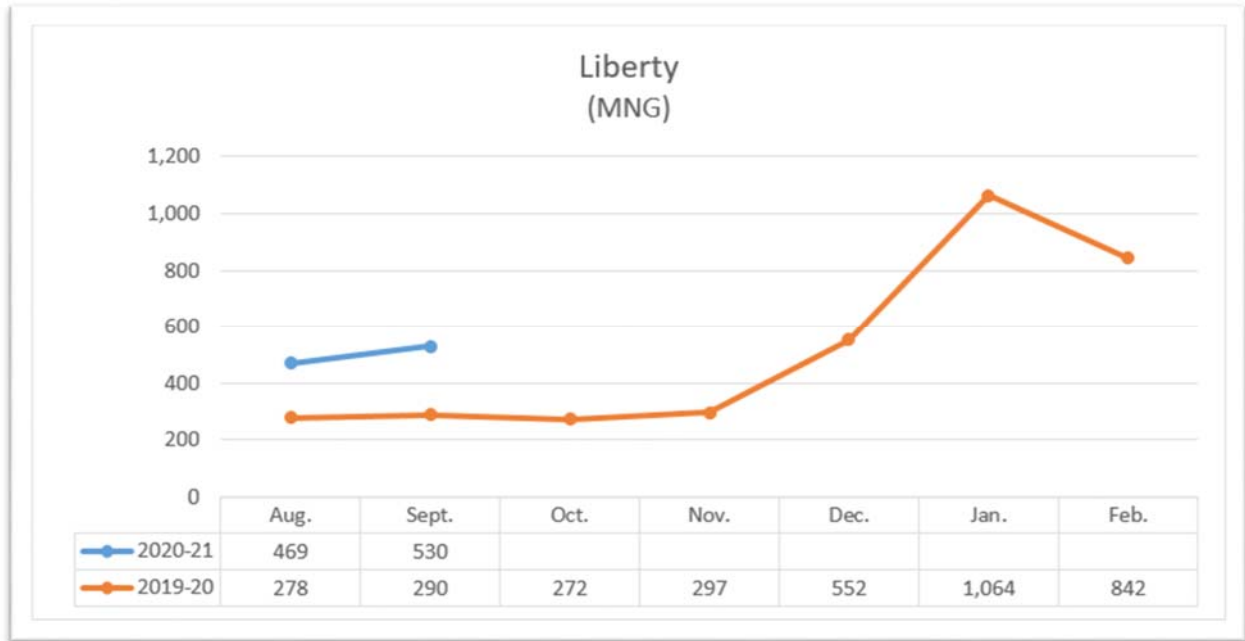
As shown in the previous graph, Liberty (MNG) performed approximately 255% more disconnections for non-payment in September 2020 versus September 2019 and about 64% less in September 2020 than in August 2020.

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”



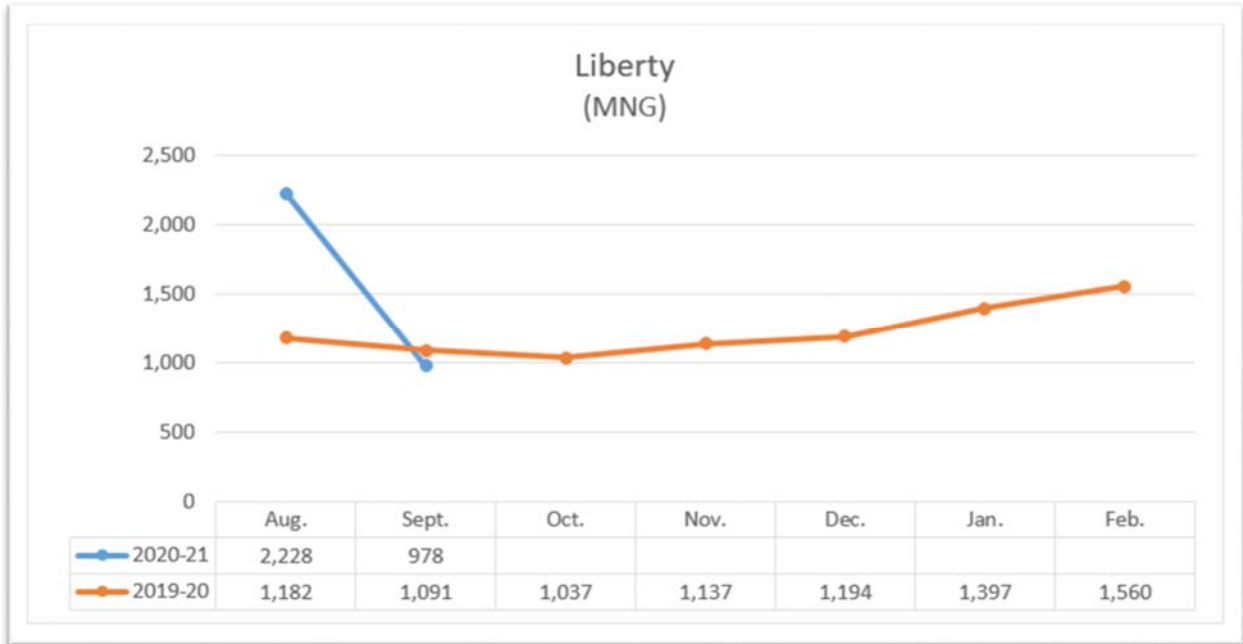
The previous data indicates that there were about 33% more Liberty (MNG) customers with past-due accounts in September 2020 versus September 2019 and approximately 7% less in September 2020 than in August 2020. Liberty (MNG) reported that it considers accounts past-due when they have a past-due balance 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 83% more customers who were not disconnected in September 2020 versus September 2019 and approximately 13% more in September 2020 than in August 2020.

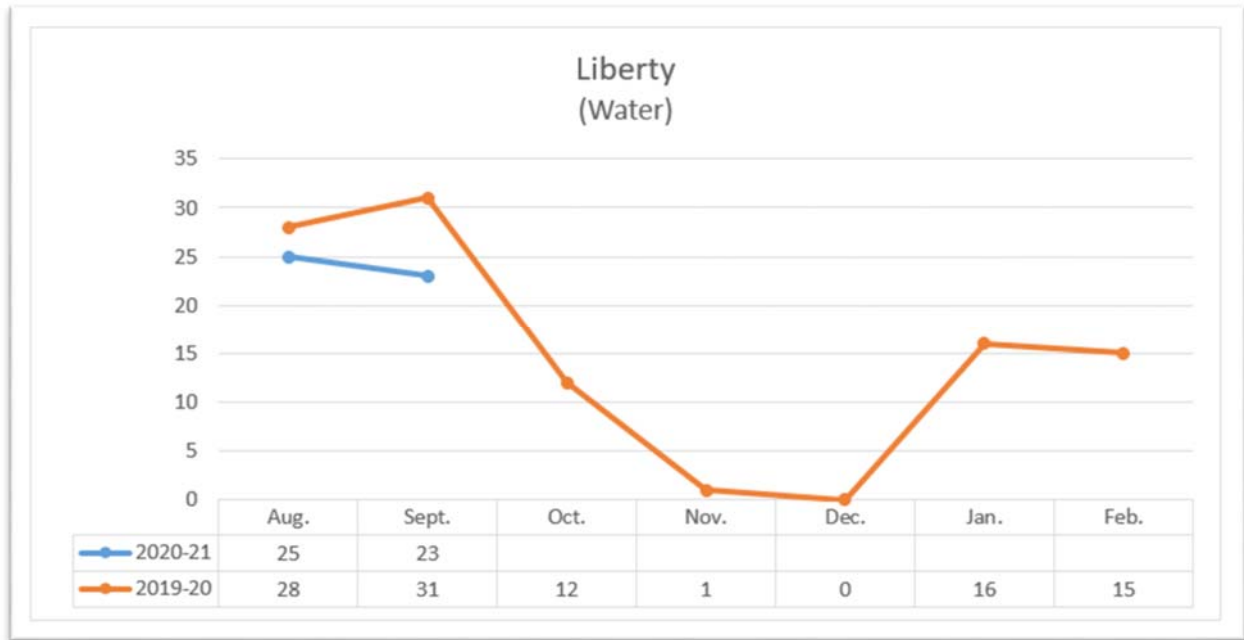
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 10% less Liberty (MNG) customers who participated in payment plans in September 2020 versus September 2019 and 56% less in September 2020 than in August 2020.

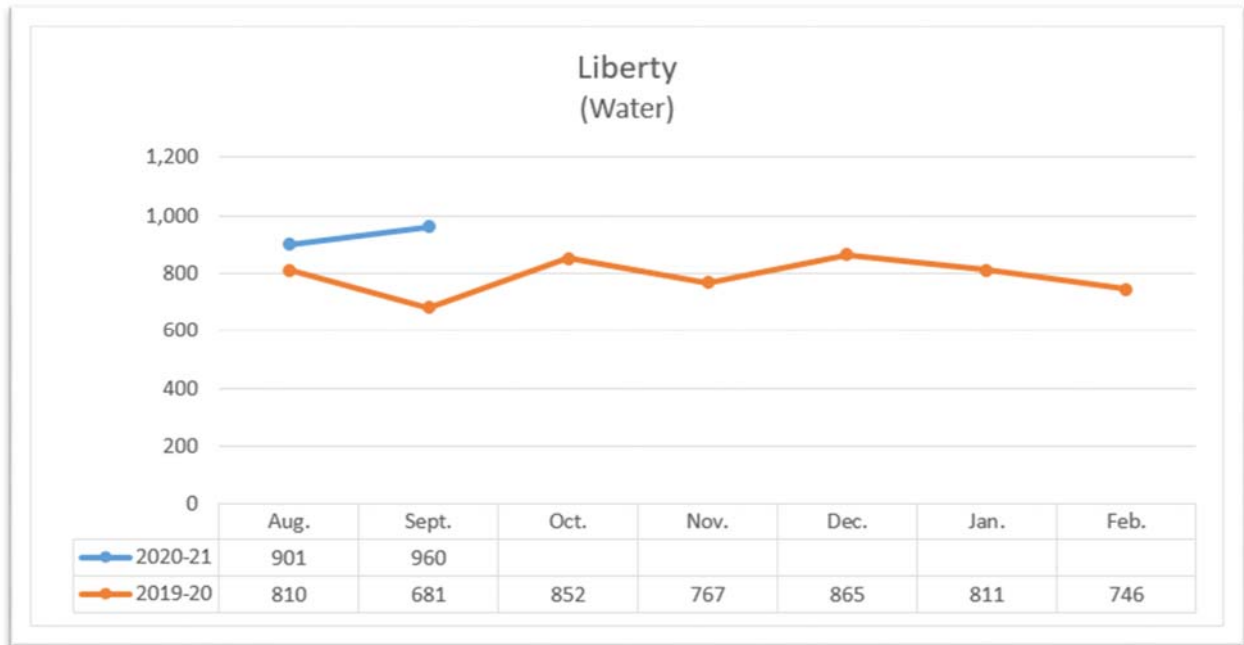
Questions 1 & 3 (Liberty - Water)

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



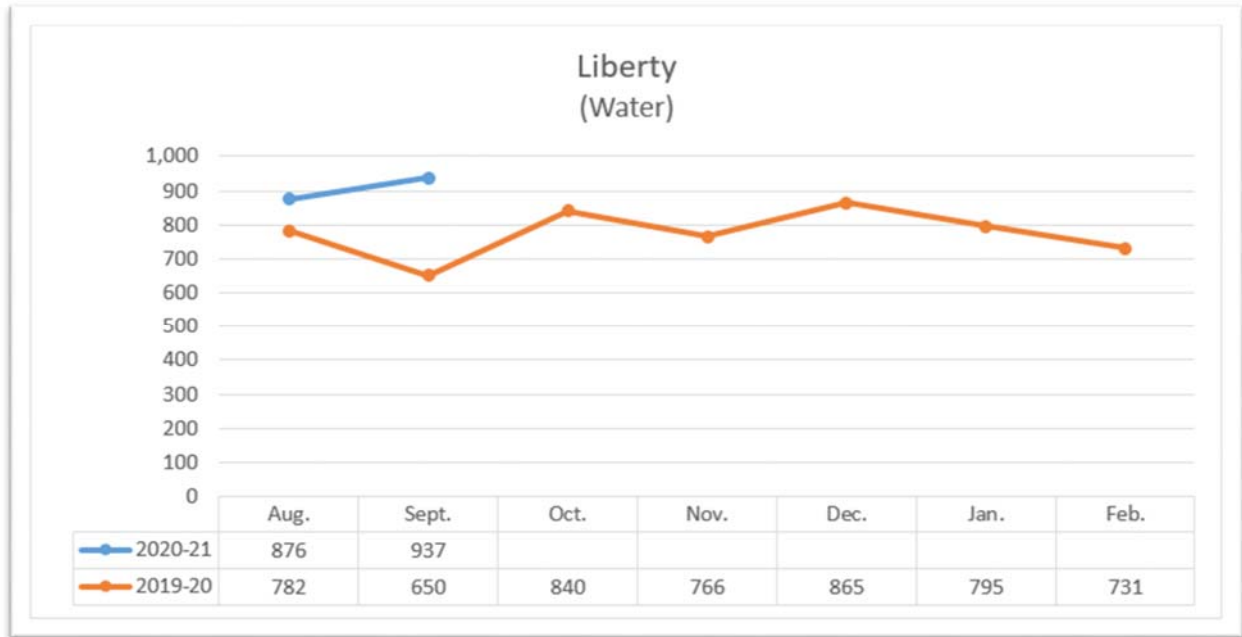
As shown in the previous graph, Liberty performed approximately 26% fewer disconnections for non-payment in September 2020 versus September 2019 and about 8% less in September 2020 than in August 2020.

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”



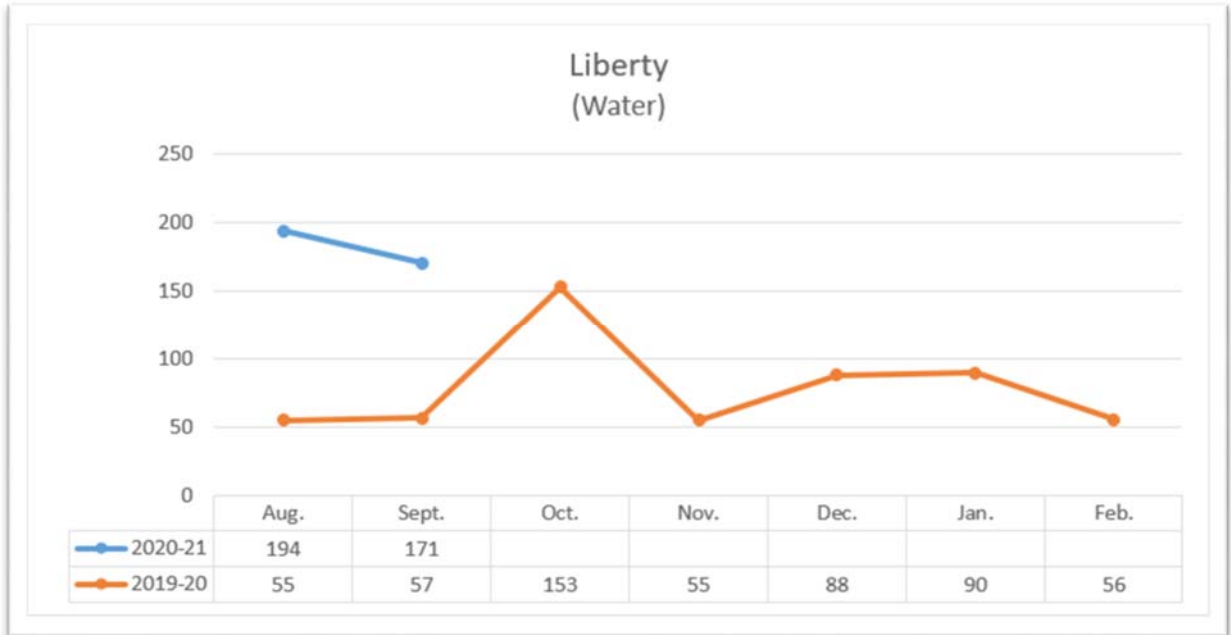
The previous data indicates that there were about 41% more Liberty customers with past-due accounts in September 2020 versus September 2019 and approximately 7% more in September 2020 than in August 2020. Liberty reported that a shut-off notice is sent for any account that owes \$50.00 or more after 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 44% more customers who were not disconnected in September 2020 versus September 2019 and approximately 7% more in September 2020 than in August 2020.

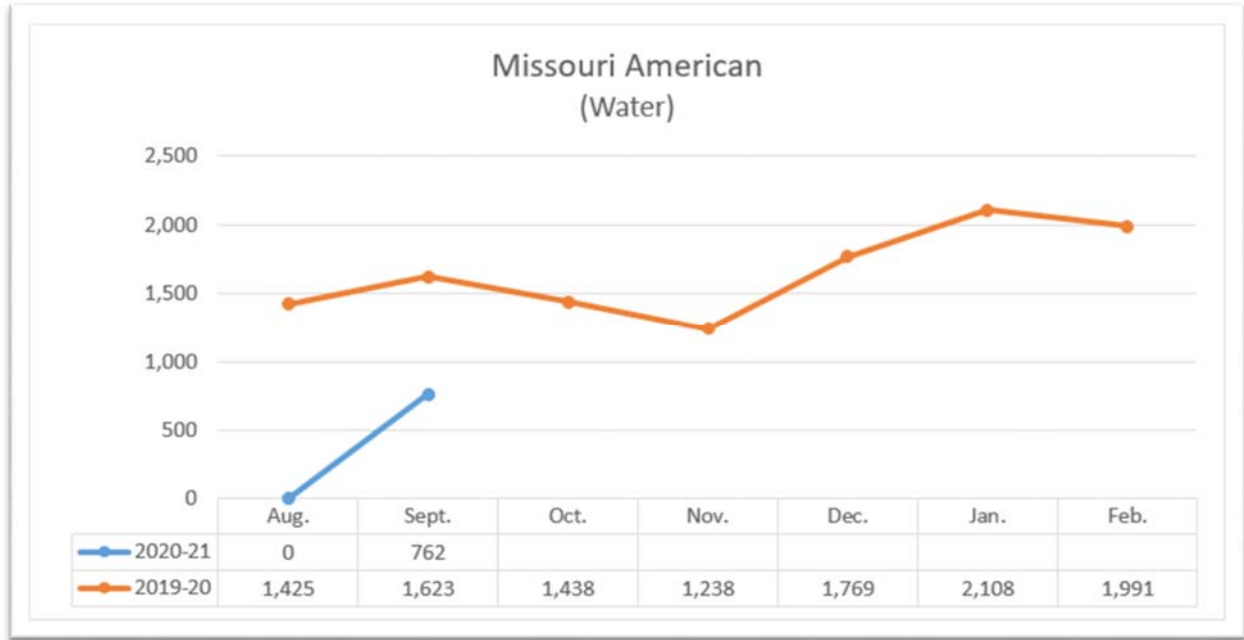
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 200% more Liberty customers who participated in payment plans in September 2020 versus September 2019 and about 12% less in September 2020 than in August 2020.

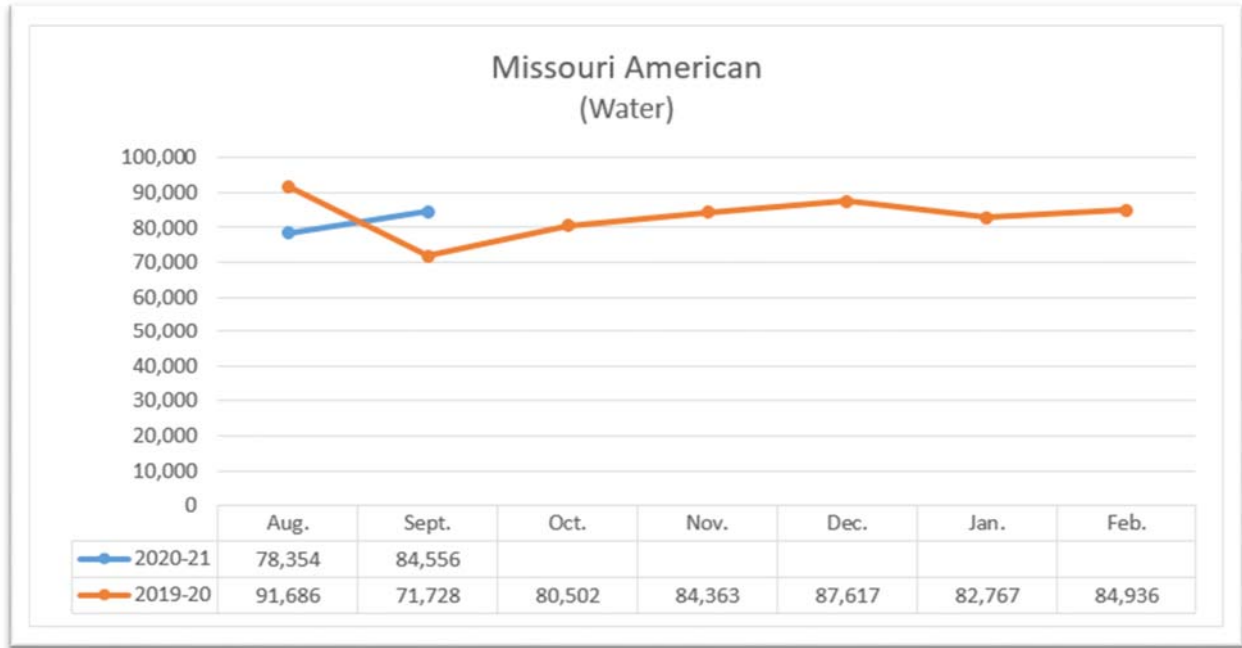
Questions 1 & 3 (Missouri American - Water)

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



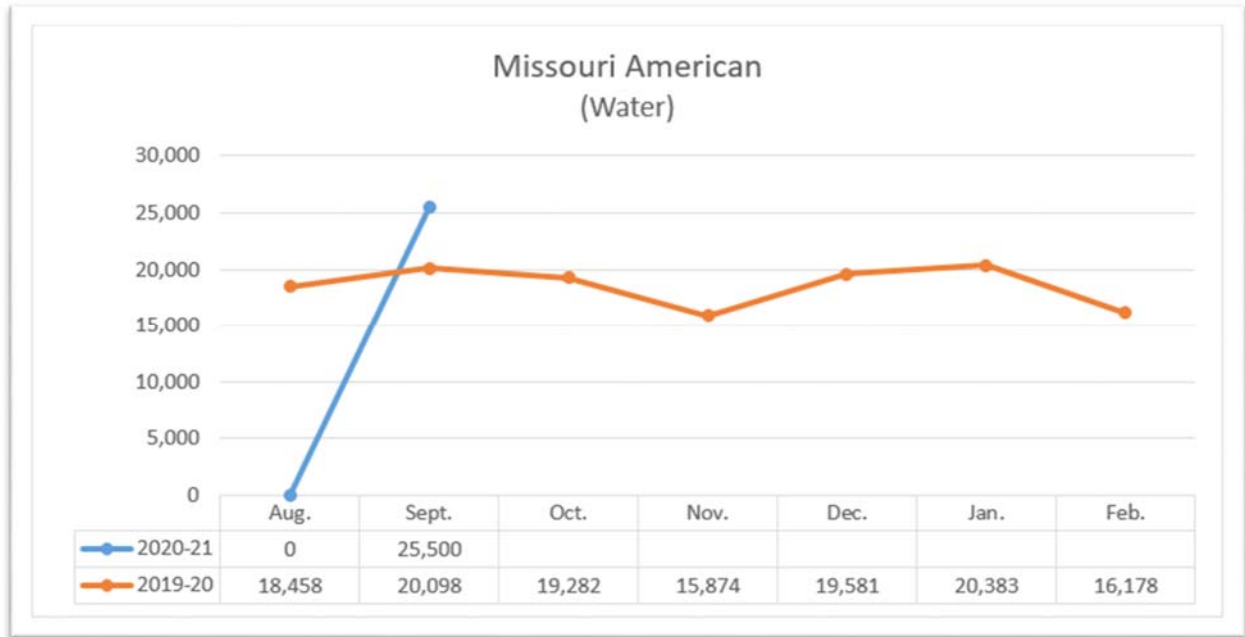
As shown in the previous graph, Missouri American performed approximately 53% fewer disconnections for non-payment in September 2020 versus September 2019. There were 762 disconnections for non-payment in September 2020 versus none in August 2020.

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”



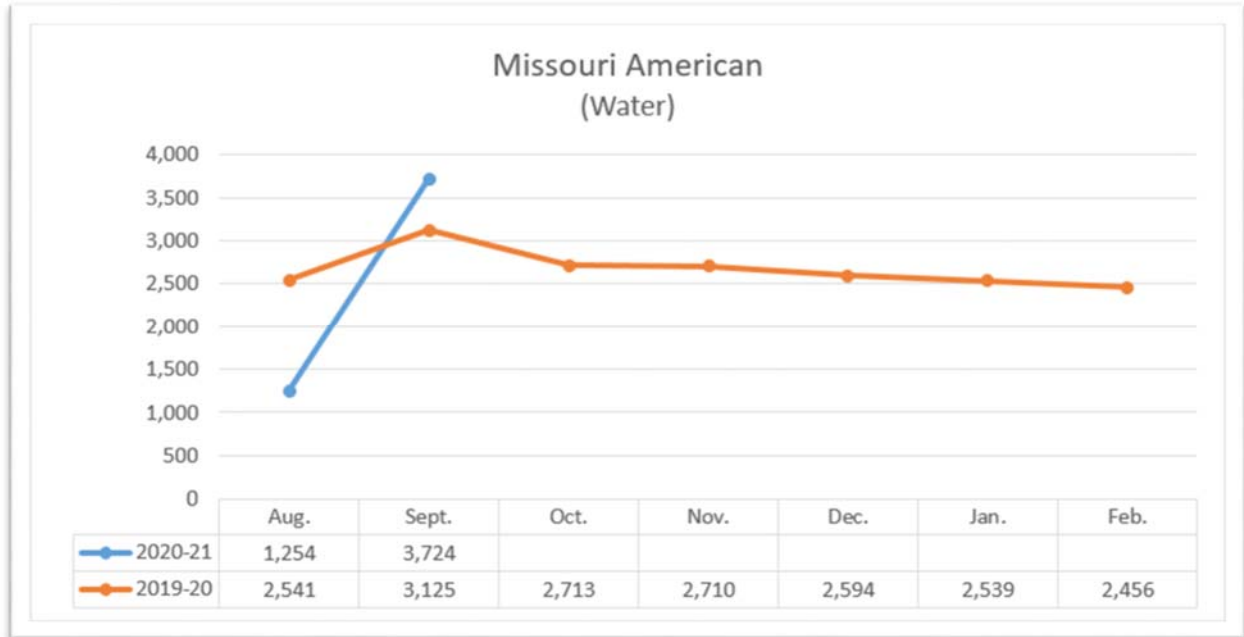
The previous data indicates that there were about 18% more Missouri American customers with past-due accounts in September 2020 versus September 2019 and approximately 8% more in September 2020 than in August 2020. Missouri American reported that it defines “past-due” as any unpaid amount past the due 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 27% more customers who were not disconnected in September 2020 versus September 2019. There were 25,500 customers who received a final disconnection notice and were not disconnected in September 2020 versus none in August 2020.

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

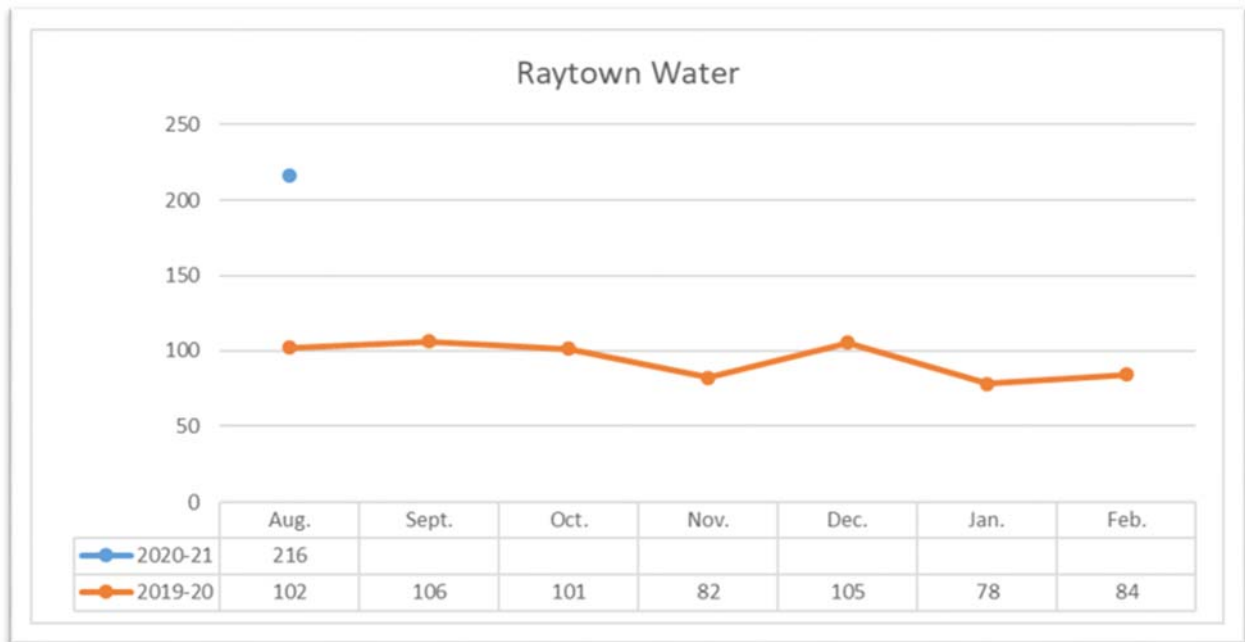


The previous graph illustrates that there were approximately 19% more Missouri American customers who participated in payment plans in September 2020 versus September 2019 and about 197% more in September 2020 than in August 2020.

Questions 1 & 3 (Raytown Water)

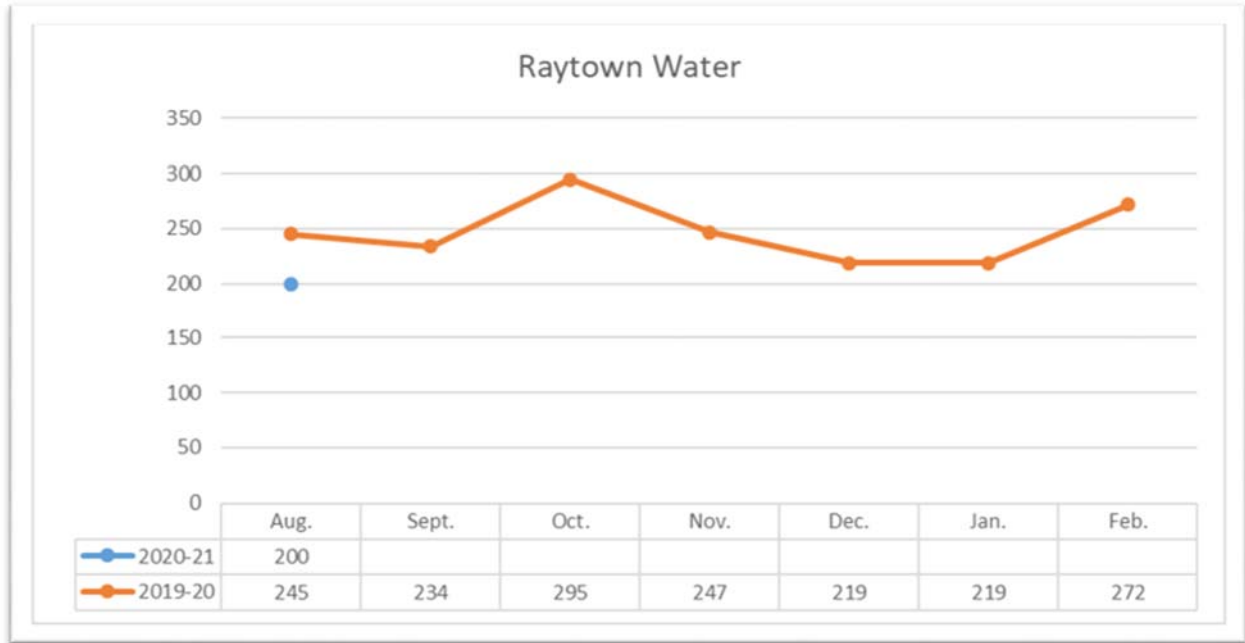
Raytown Water provided a table in response to the data requests that included some September disconnection information, but the table did not directly include all of the information necessary for inclusion in the following discussion. Consequently, Raytown Water’s September data will be incorporated in the next report update that will be filed in November.

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 112% more disconnections for non-payment in August 2020 versus August 2019.

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 18% fewer Raytown Water customers with past-due accounts in August 2020 versus August 2019. Raytown Water reported that it defines “past-due” as accounts with balances that are over 31 days.

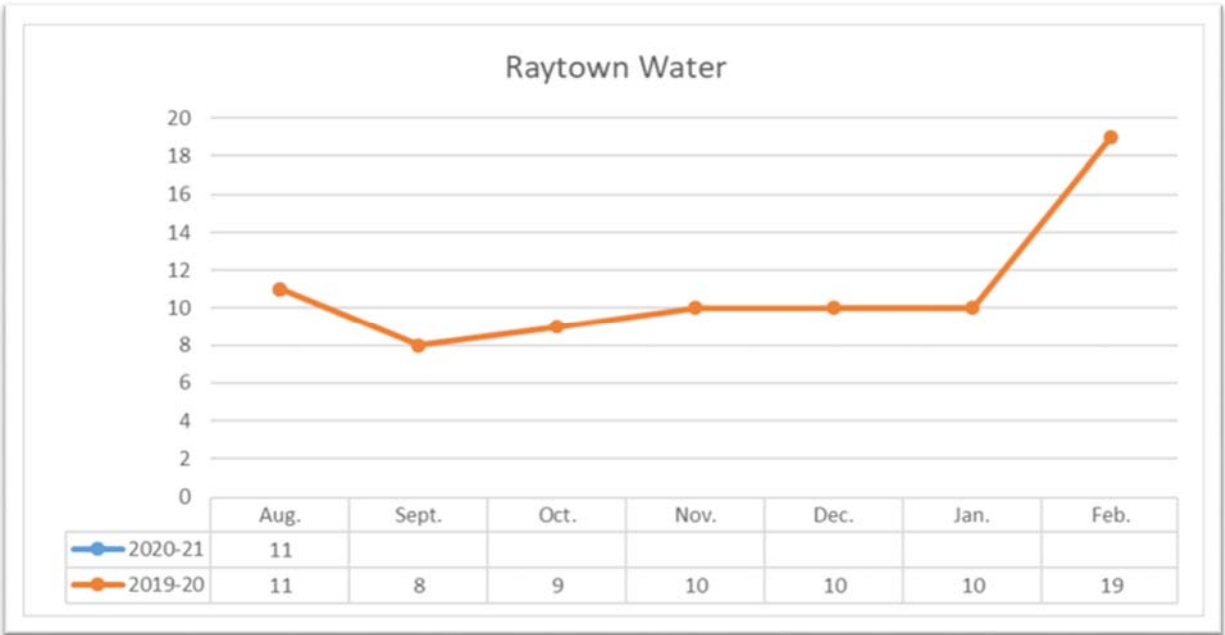
c) **The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end**



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

As shown by Raytown Water’s data, 91 customers received a final disconnection notice in August 2020 but were not disconnected for non-payment of service. The Company’s data request response stated that this information was not readily available for the August 2019 through February 2019 time period.

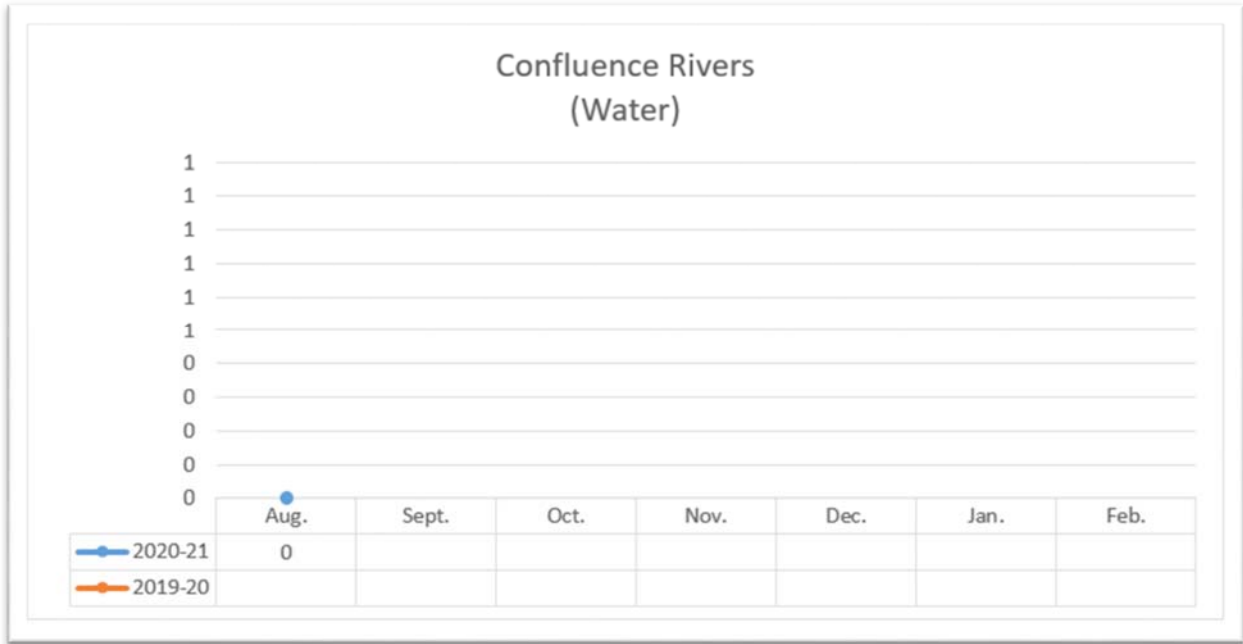
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were 11 Raytown customers who participated in payment plans in both August 2020 and August 2019.

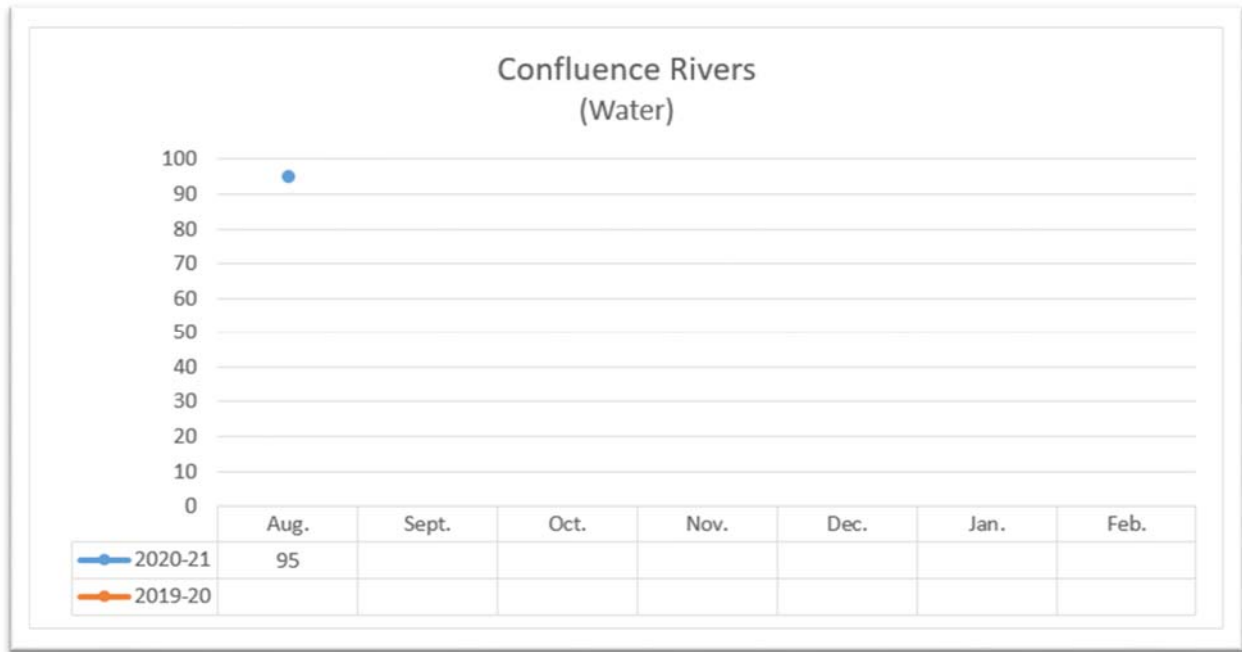
Questions 1 & 3 (Confluence Rivers - Water)

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



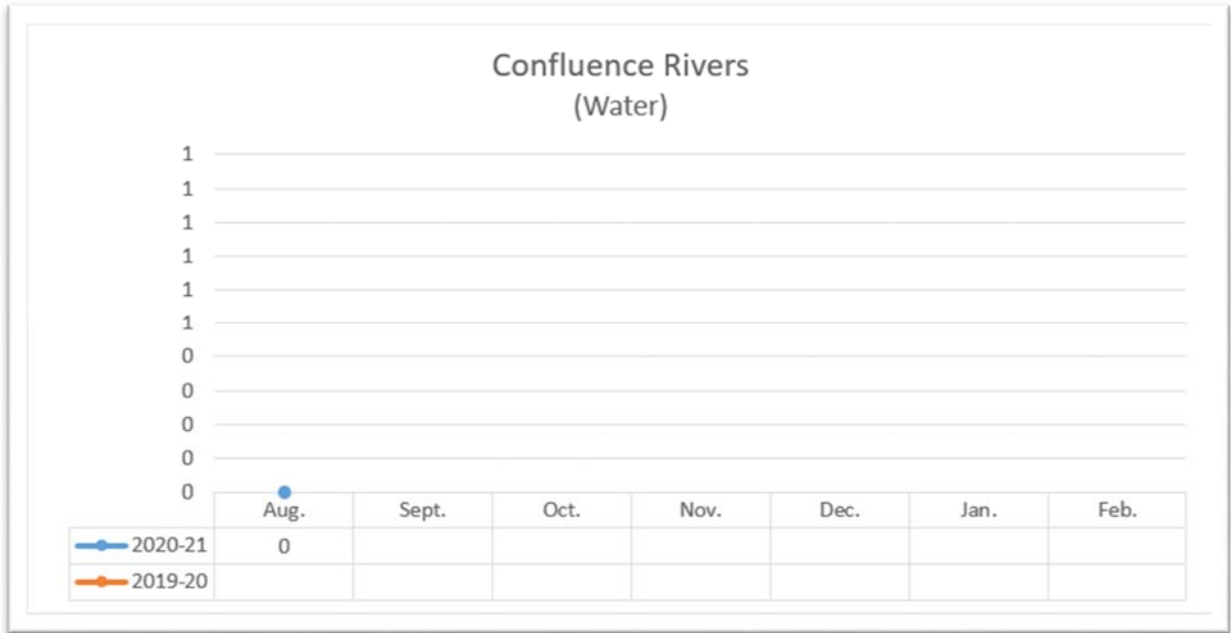
As shown in the previous graph, Confluence Rivers performed no disconnections in August 2020. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 24 disconnections was performed.

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



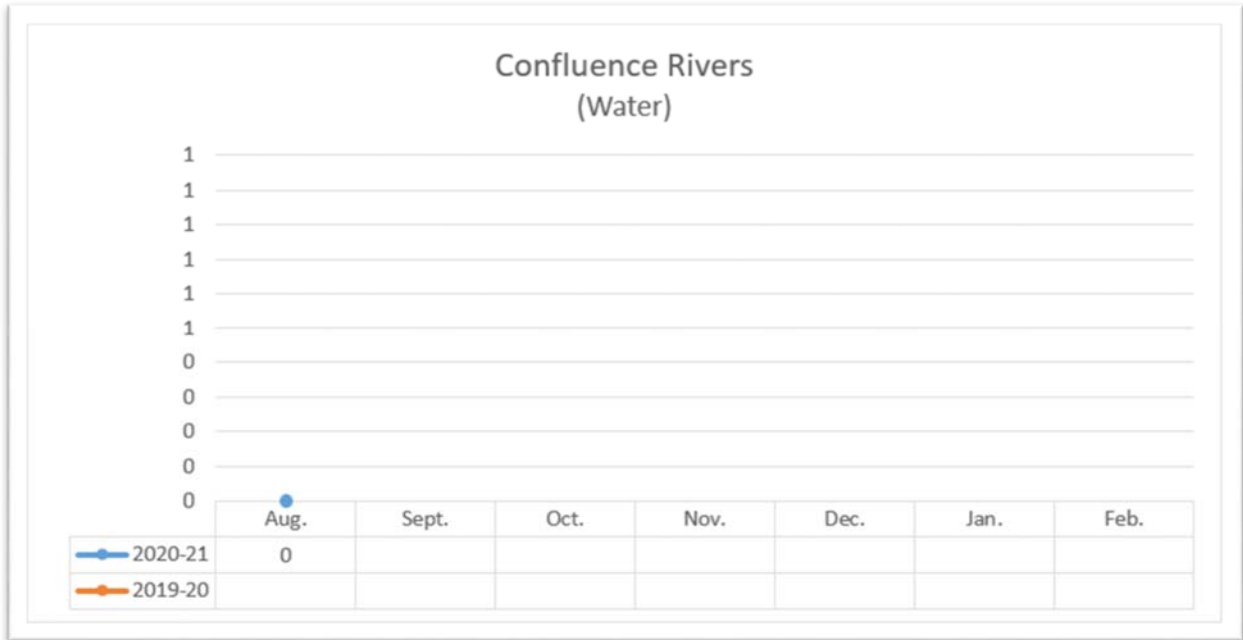
The previous data indicates there were 95 Confluence Rivers customers with past-due accounts in August 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 37 customers with “past-due” accounts during this time period. Confluence Rivers reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid.

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



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

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



The previous graph illustrates that there were no Confluence Rivers customers who participated in payment plans in August 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 August 2020. No monthly, comparative data was provided for August 2019 to February 2020, although no disconnections were performed during this time period.

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



The previous data indicates there were 29 Elm Hills customers with past-due accounts in August 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 1 customer with a “past-due” account during this time period. Elm Hills reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid.

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



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

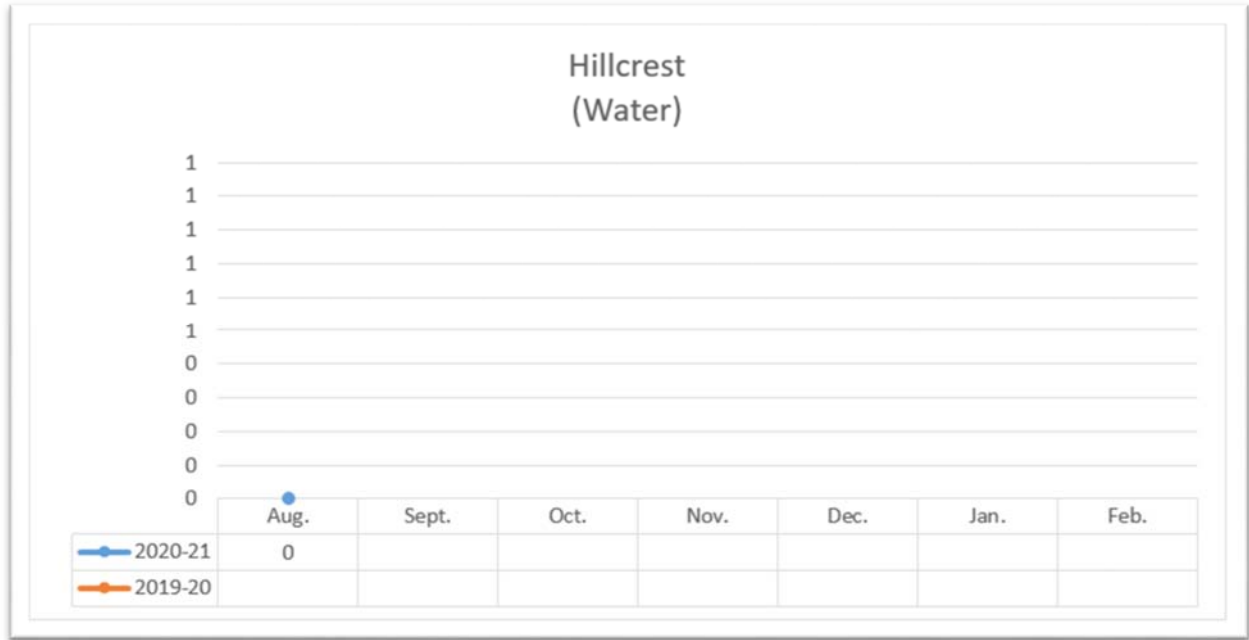
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were no Elm Hills customers who participated in payment plans in August 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



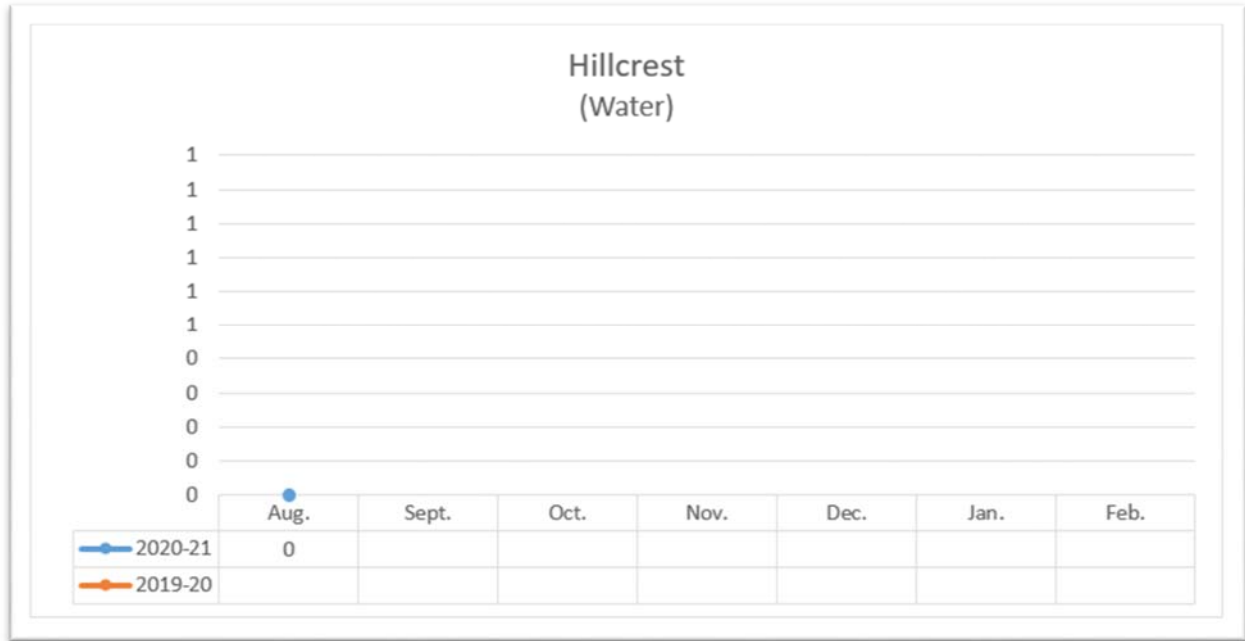
As shown in the previous graph, Hillcrest performed no disconnections in August 2020. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 12 disconnections was performed during this time period.

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



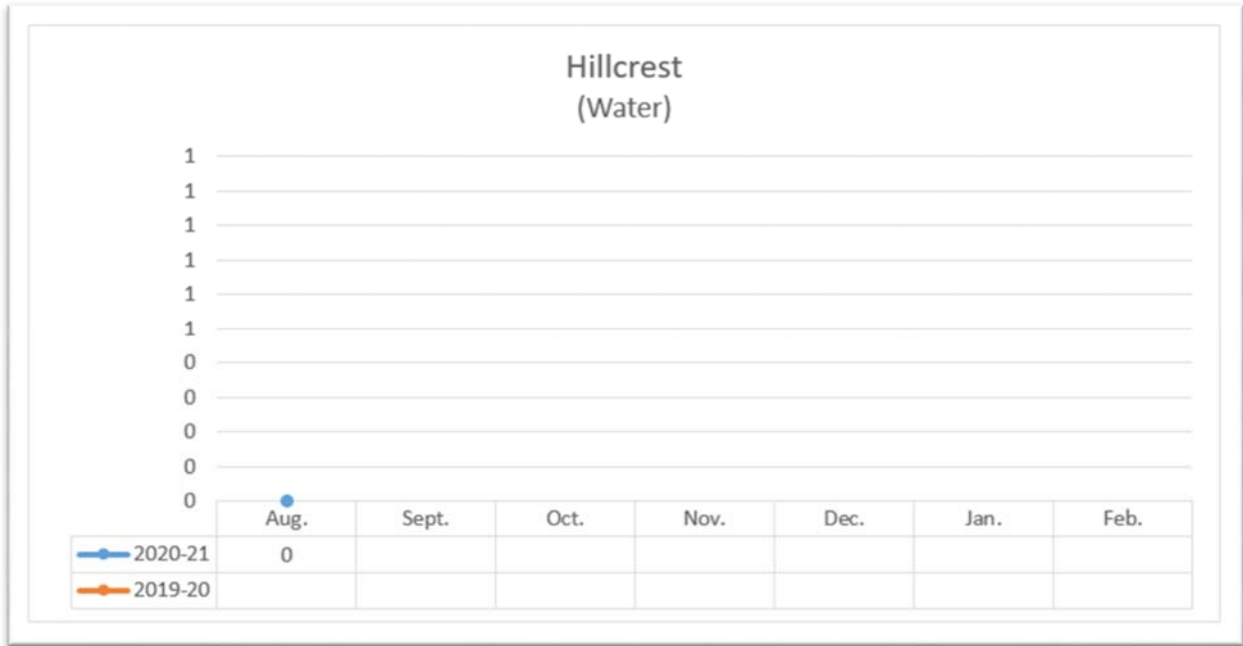
The previous data indicates there were 31 Hillcrest customers with past-due accounts in August 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 16 customers with “past-due” accounts during this time period. Hillcrest reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid.

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



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

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



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

Questions 1 & 3 (Indian Hills - Water)

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



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

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



The previous data indicates there were 29 Indian Hills customers with past-due accounts in August 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 11 customers with “past-due” accounts during this time period. Indian Hills reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid.

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



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

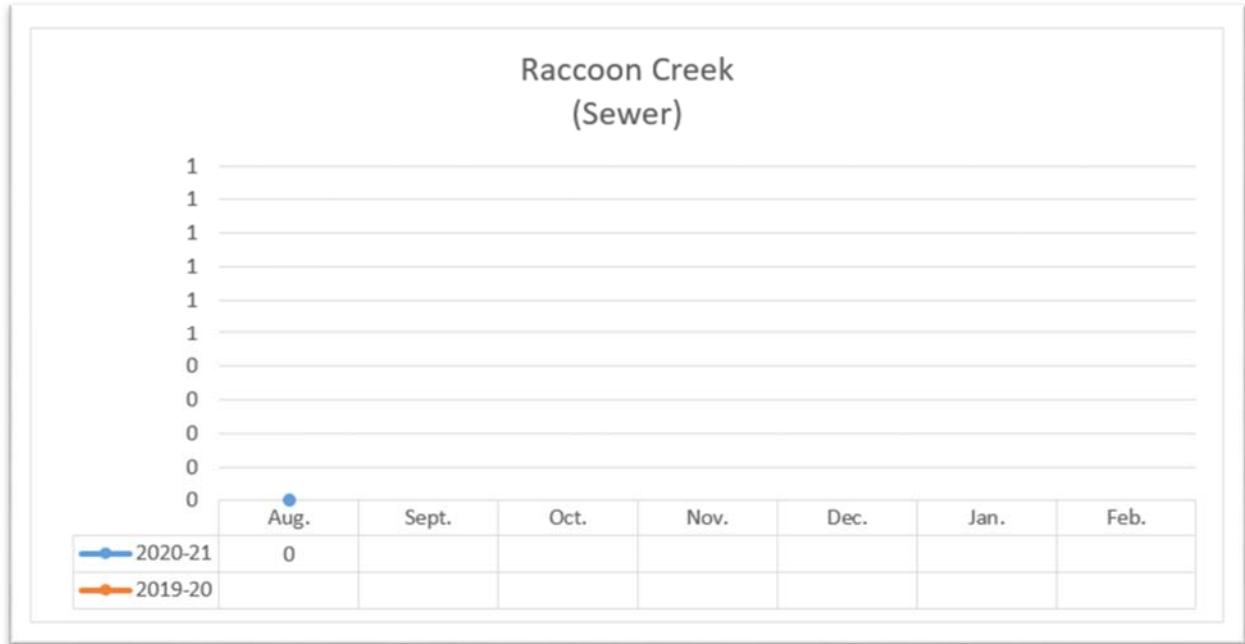
d) The number of customers at each month-end participating in payment plans



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

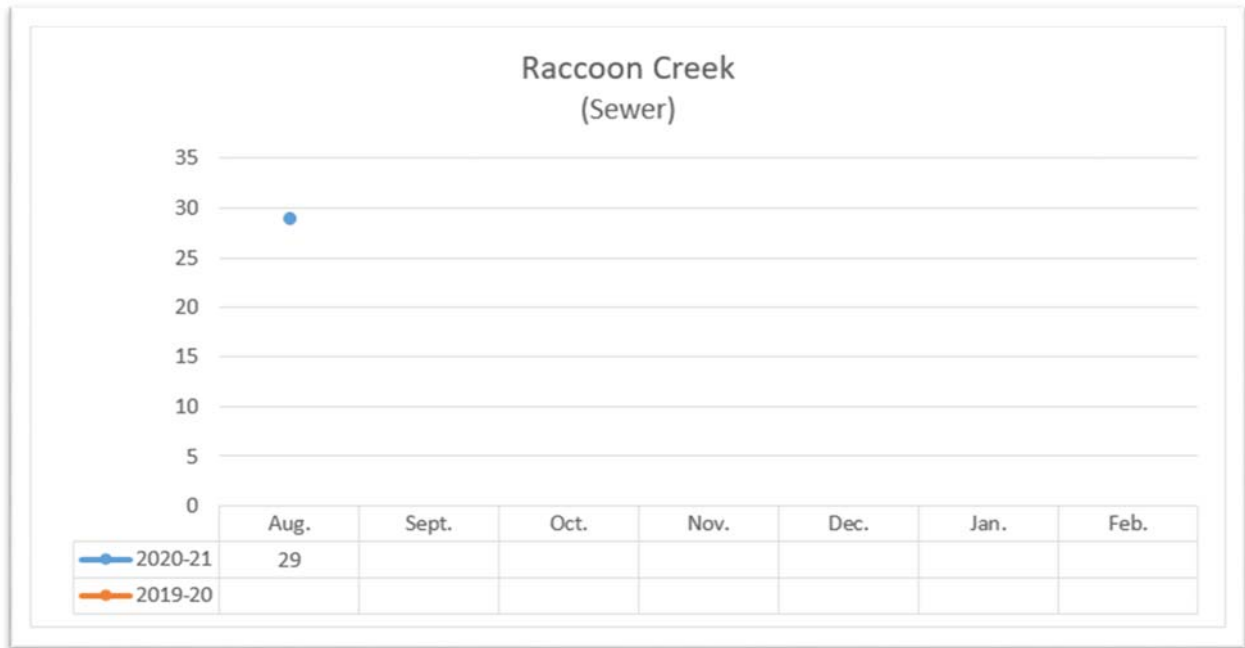
Questions 1 & 3 (Raccoon Creek - Sewer)

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



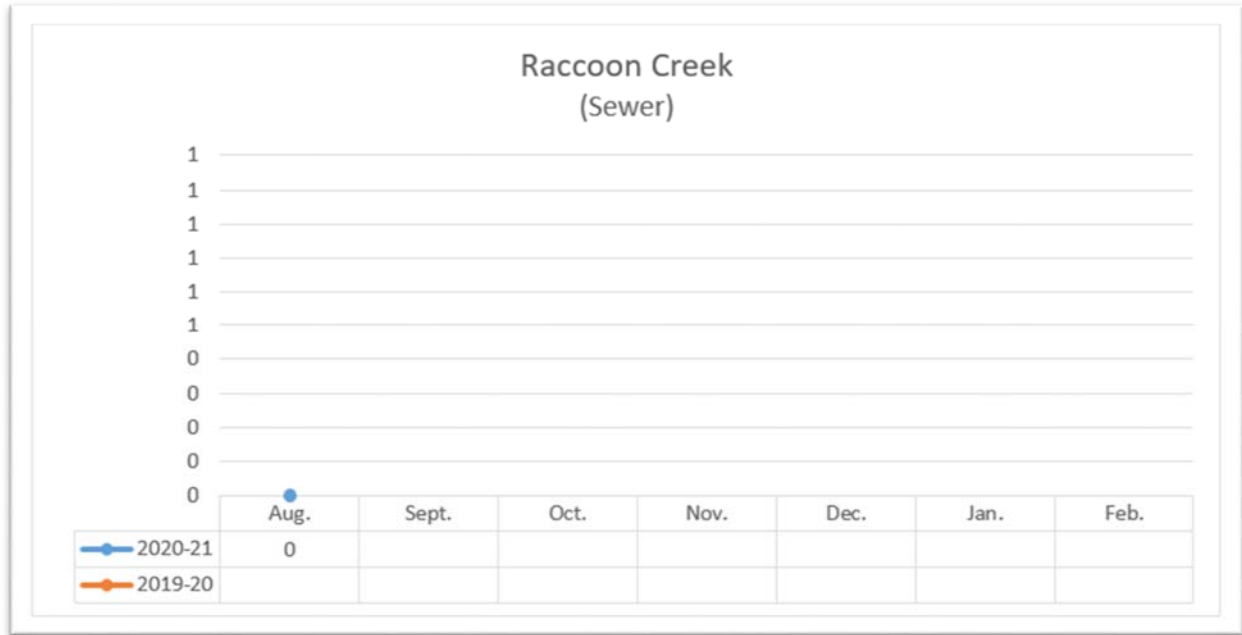
As shown in the previous graph, Raccoon Creek performed no disconnections in August 2020. No monthly, comparative data was provided for August 2019 to February 2020, although a total of 1 disconnection was performed during this time period.

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



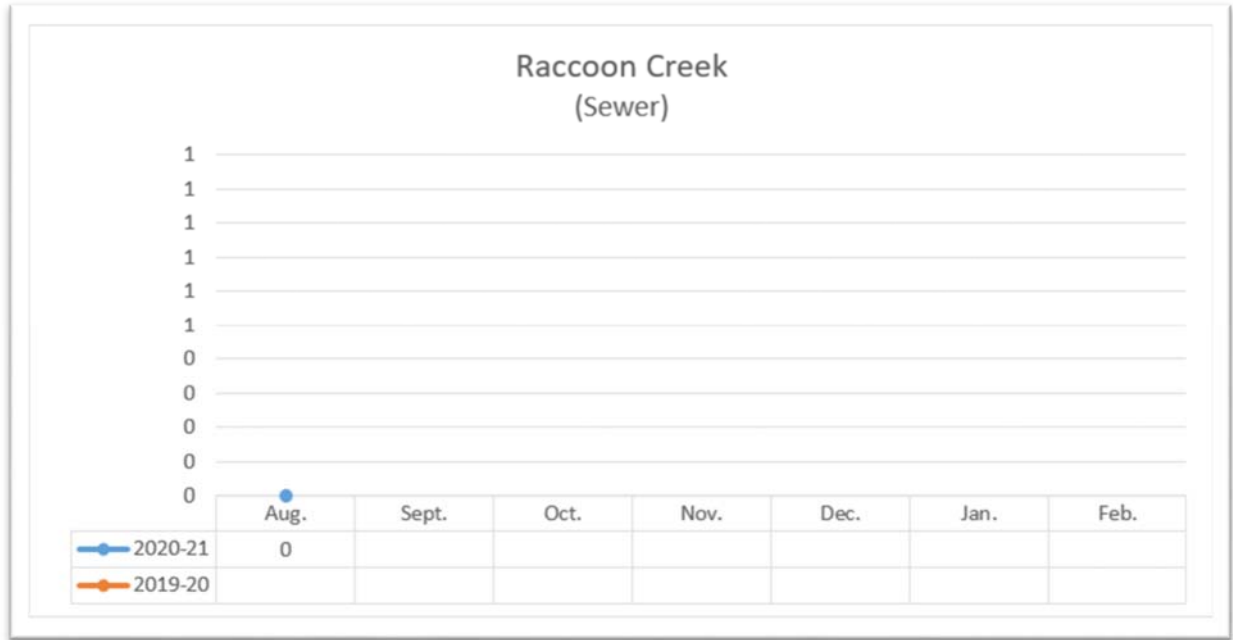
The previous data indicates there were 29 Raccoon Creek customers with past-due accounts in August 2020. No monthly, comparative data was provided for August 2019 to February 2020, although there was a total of 3 customers with “past-due” accounts during this time period. Raccoon Creek reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid.

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



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

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



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

Question 2

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

Ameren Missouri (Electric)

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

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

Empire (Electric)

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

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

Evergy Metro (Electric)

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

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 West (Electric)

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

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.

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	25	25	120	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. After that time, Confluence Rivers will have a more accurate way of estimating what is to come and will provide an answer with that monthly update.

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. After that time, Hillcrest will have a more accurate way of estimating what is to come and will provide an answer with that monthly update.

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. After that time, Hillcrest will have a more accurate way of estimating what is to come and will provide an answer with that monthly update.

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. After that time, Hillcrest will have a more accurate way of estimating what is to come and will provide an answer with that monthly update.

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. After that time, Hillcrest will have a more accurate way of estimating what is to come and will provide an answer with that monthly update.