

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

4. Staff filed supplemental DRs in this docket on March 26, 2021. The supplemental DRs requested that utilities provide estimates of the number of

disconnections for non-payment of service for the six-month period of March through August 2021.

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

6. In its *Order Extending Direction to Staff to Gather Information About Utility Disconnections* (“Order”), issued August 11, 2021, the Commission directed Staff to continue filing these reports through February 2022, or until further order of the Commission.

7. Staff filed additional DRs on August 26, 2021, requesting that utilities provide estimates of the number of disconnections for non-payment of services for the six month period of September 2021 through February 2022.

8. Per the Commission’s August 11, 2021 Order, starting with the prior month’s report Staff added a baseline showing the monthly average values prior to the pandemic to show how much the current numbers deviate from the pre-pandemic norm.

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

Respectfully Submitted,

/s/ Ron Irving

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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 21st day of January, 2022.

/s/ Ron Irving

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

January 21, 2022

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FOR RECOVERY OF PAST-DUE UTILITY CUSTOMER PAYMENTS
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Staff Report on Utility Data Request Responses in

File No. AW-2020-0356

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

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

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

On July 22, 2021, Staff filed its monthly report and also requested that the Commission issue an order setting a timeline for the filing of further reports in this matter. On August 11, 2021, the Commission issued its "Order Extending Direction to Staff to Gather Information about Utility Disconnections". This order directed Staff to continue to gather information provided in previous reports, but to also include a baseline in the graphs for questions 1 and 3 showing the monthly average values prior to the pandemic. This adjustment will be shown in the report below. Staff also issued updated data requests for Question 2) from September 2021 through February 2022.

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

(Missouri Water), LLC (“Liberty – Water”); Liberty Midstates Gas (“Liberty – MNG – Gas”) Missouri-American Water Company (“Missouri-American - Water”) 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”).

On October 14, 2021, in Case Number WM-2021-0412 the Commission approved the merger of Confluence Rivers Utility Operating Company, Inc.; Hillcrest Utility Operating Company, Inc.; Elm Hills Utility Operating Company, Inc.; Osage Utility Operating Company, Inc.; Raccoon Creek Utility Operating Company, Inc.; and Indian Hills Utility Operating Company, Inc. Confluence Rivers Utility Operating Company, Inc. will be the surviving corporation. The Order became effective November 13, 2021. The previous information obtained from the separate entities will remain in the 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 July 2020 (grey dots and line), for the period of August 2020 through July 2021 (orange dots and line) and August 2021 through December 2021 (blue dots and line). As this report is updated in the future, the blue dots and line will extend through future months. This method of presentation will allow for a direct comparison of the reported information from August 2019 to December 2021 with the same month for each year. Also, the report will specify the most recent month-to-month percentage change for each category of information (e.g., number of disconnections in December 2021 compared to November 2021). It will also

compare the percentage change for each category of information for the current month versus the same month, pre-pandemic.

Summary of Responses to Questions 1 and 3

For question 1a and 3a, about the same number of utilities reported increases and decreases in the number of customer disconnections in December 2021 compared to the previous month (November 2021). However, more utilities had increases than experienced decreases in the number of disconnections in December 2021 compared to the previous year (December 2020) and pre-pandemic levels (December 2019). In particular, all of the state's electric utilities showed very large increases in customer disconnections last month compared to the levels one year earlier. This is probably attributable to the restrictions on disconnection that these utilities had placed upon themselves in late 2020, and to the warmer-than-normal weather conditions occurring in December 2021.

For Question 1b and 3b, most of the responding utilities did not show a big change in the number of past-due customer accounts in December 2021 compared to November 2021, December 2020 and December 2019.

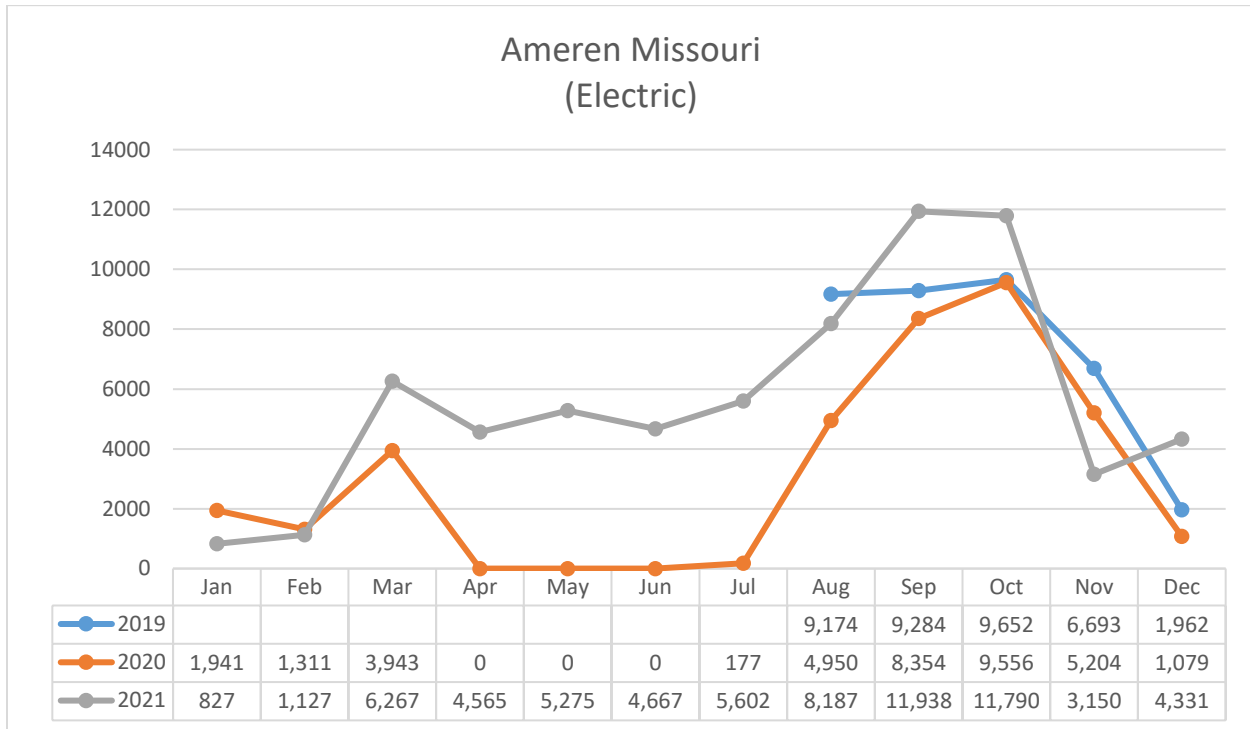
For Question 1c and 3c, about the same number of utilities reported increases and decreases in December 2021 compared to the previous month and previous year in the number of customers who have received final disconnection notices, but have not yet been disconnected. Most of the utilities reported decreases in this metric in December 2021 compared to the same month in 2019.

Regarding Question 1d and 3d, almost all of utilities reported increases in the number of customers participating in payment plans in December 2021 compared to November 2021. About the same number of utilities reported increases or decreases in the December 2021 results compared to December 2020 and 2019.

Individual Utility Responses:

Questions 1 & 3 (Ameren Missouri – Electric)³

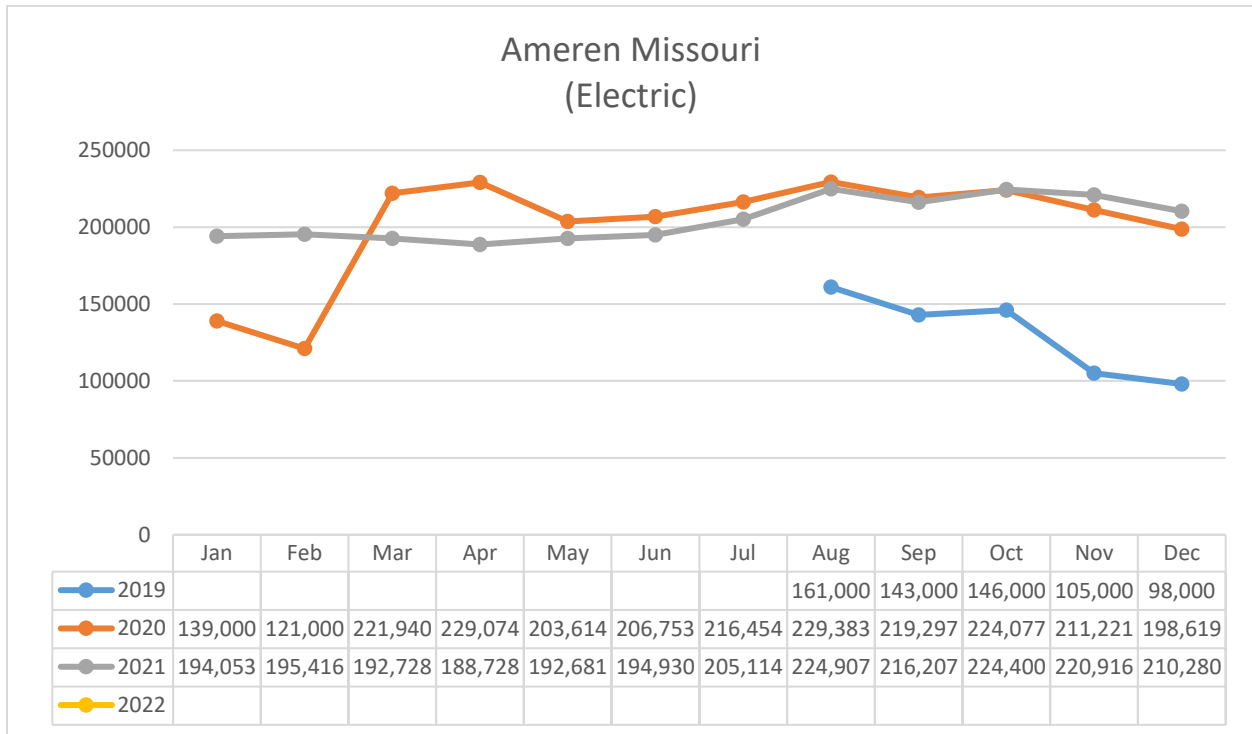
a) The number of disconnections for non-payment of services as of each month-end



As shown in the previous graph, Ameren Missouri had 301% more disconnections for non-payment in December 2021 versus in December 2020 and about 37% more in December 2021 than in November 2021. The number of actual disconnections by Ameren Missouri in December 2021 was approximately 117% above the amount projected by Ameren Missouri for the same month. There were 121% more disconnections for non-payment in December 2021 versus pre-pandemic, December 2019.

³ Per Data Request Response No. 0004.1s8 from Ameren, the numbers contained in previous DR responses were updated. Remote disconnects were enabled and are now being captured in the data. The data was updated in October and the numbers will be accurate moving forward.

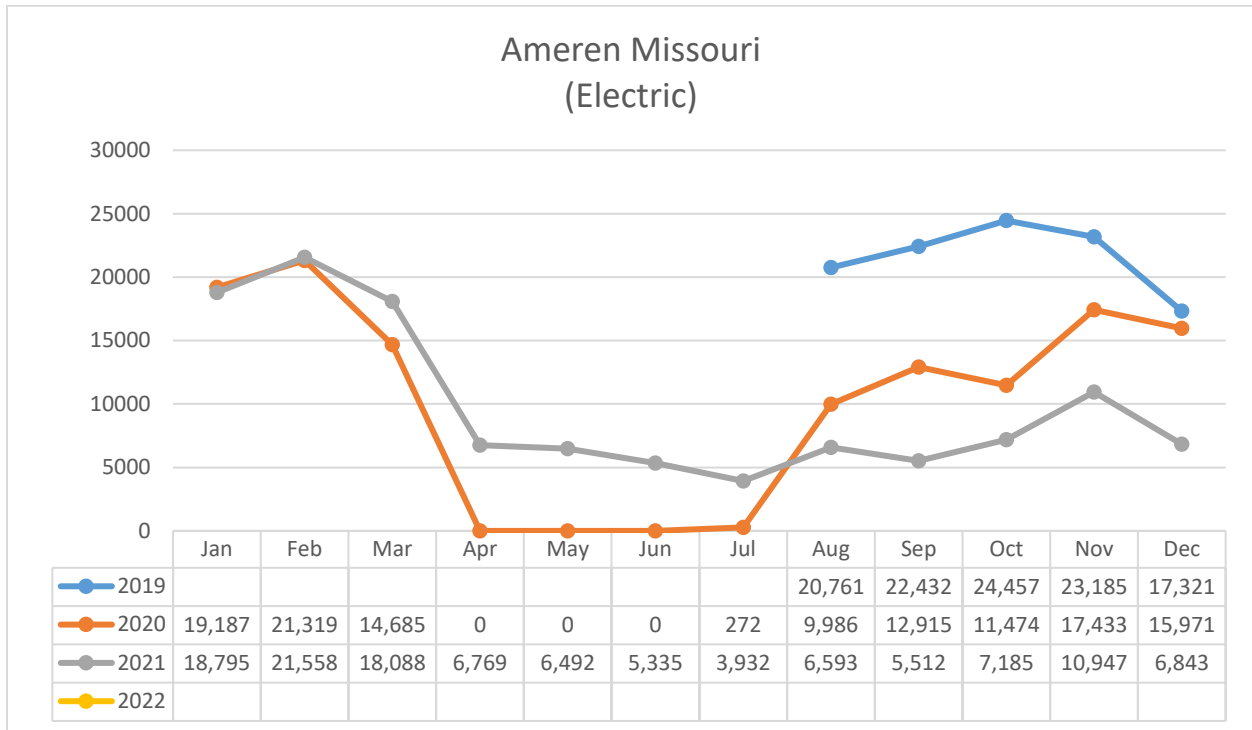
b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”⁴



The previous data indicates that there were approximately 6% more Ameren Missouri customers with past-due accounts in December 2021 versus December 2020 and 5% fewer in December 2021 than in November 2021. There were 115% more customers with past-due accounts in December 2021 versus pre-pandemic, December 2019. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

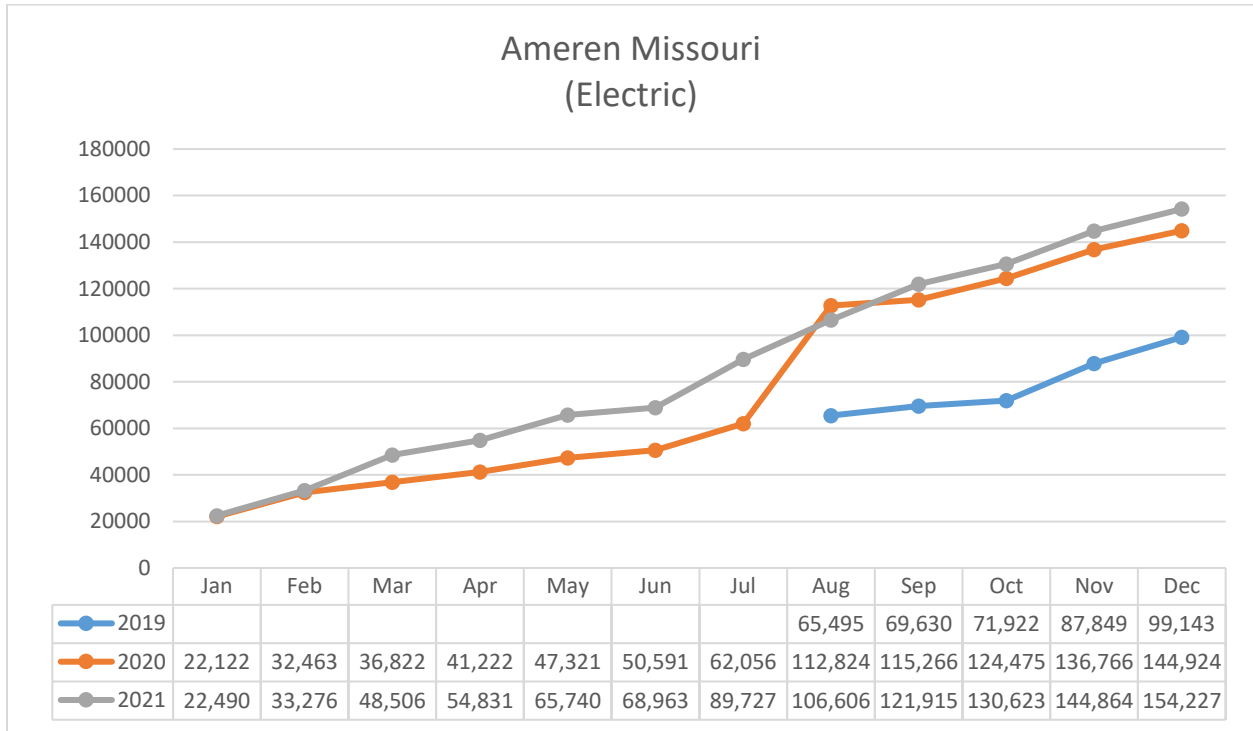
⁴ Per Data Request Response No. 0004.1s10 from Ameren, the numbers contained in previous DR responses were updated. An adjustment was made in data point (1b) due to certain regional areas were excluded for some months. May through November numbers were updated. The numbers were reviewed for accuracy and should be accurate moving forward.

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 57% fewer customers who were not disconnected in December 2021 versus in December 2020 and approximately 37% fewer in December 2021 than in November 2021. There were 60% fewer customers who received a final disconnection notice, but have not been disconnected for non-payment in December 2021 versus pre-pandemic, December 2019.

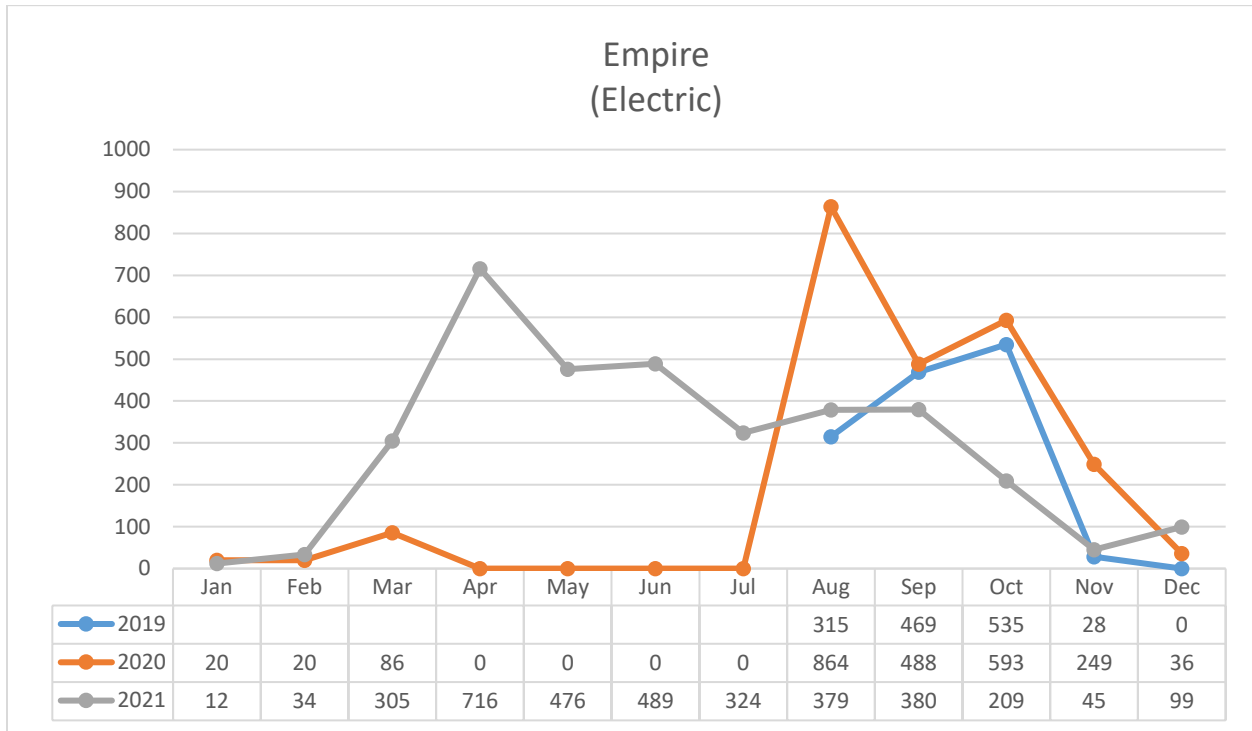
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 6% more Ameren Missouri customers who participated in payment plans in December 2021 versus December 2020 and about 6% more in December 2021 than in November 2021. There were approximately 56% more customers who participated in payment plans in December 2021 versus pre-pandemic, December 2019.

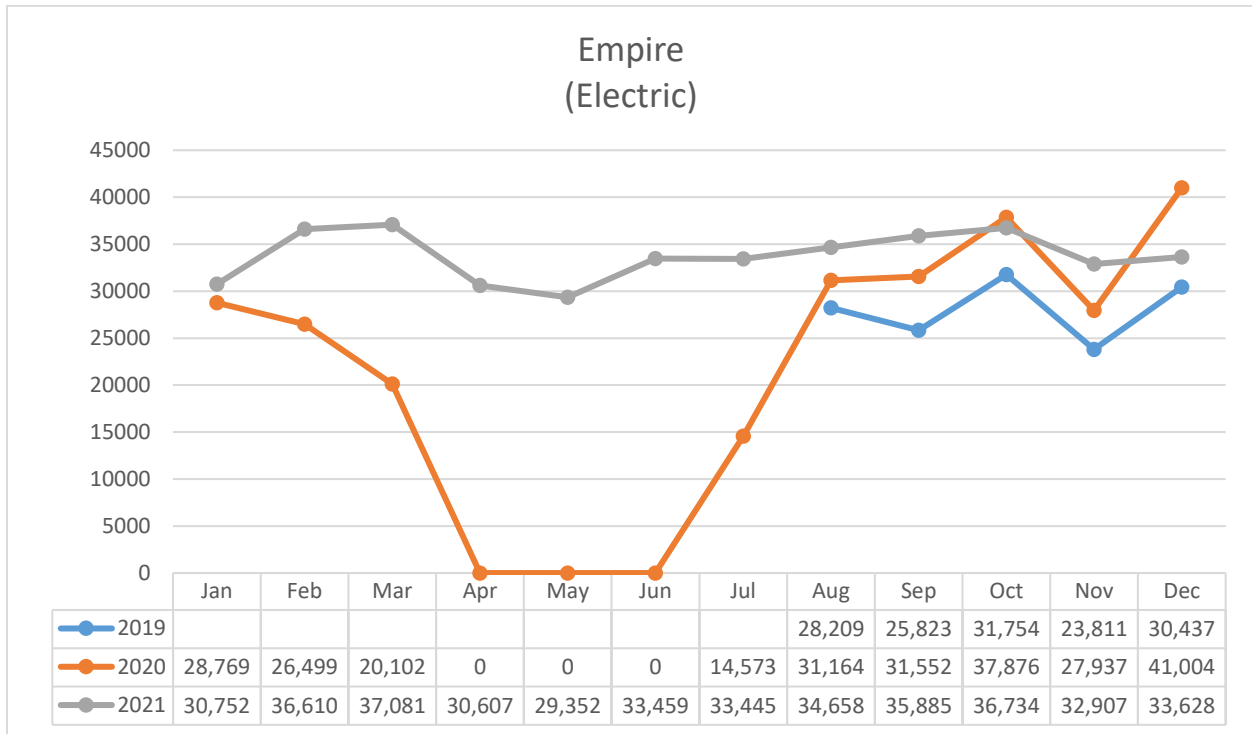
Questions 1 & 3 (Empire – Electric)

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



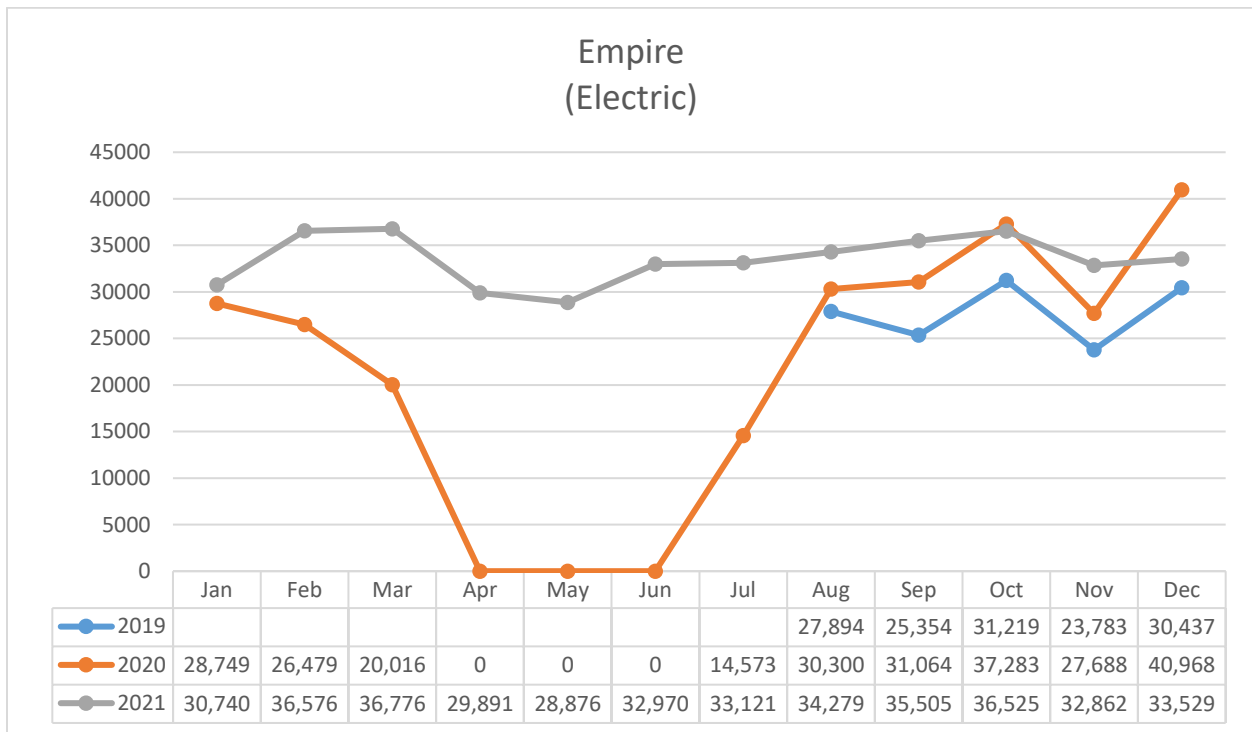
As shown in the previous graph, Empire performed approximately 175% more disconnections for non-payment in December 2021 versus December 2020 and about 120% more in December 2021 than in November 2021. The number of actual disconnections by Empire in December 2021 was 183% above the amount projected by Empire for the same month. There were 99 disconnections for non-payment of services in December 2021 versus 0 pre-pandemic, December 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”



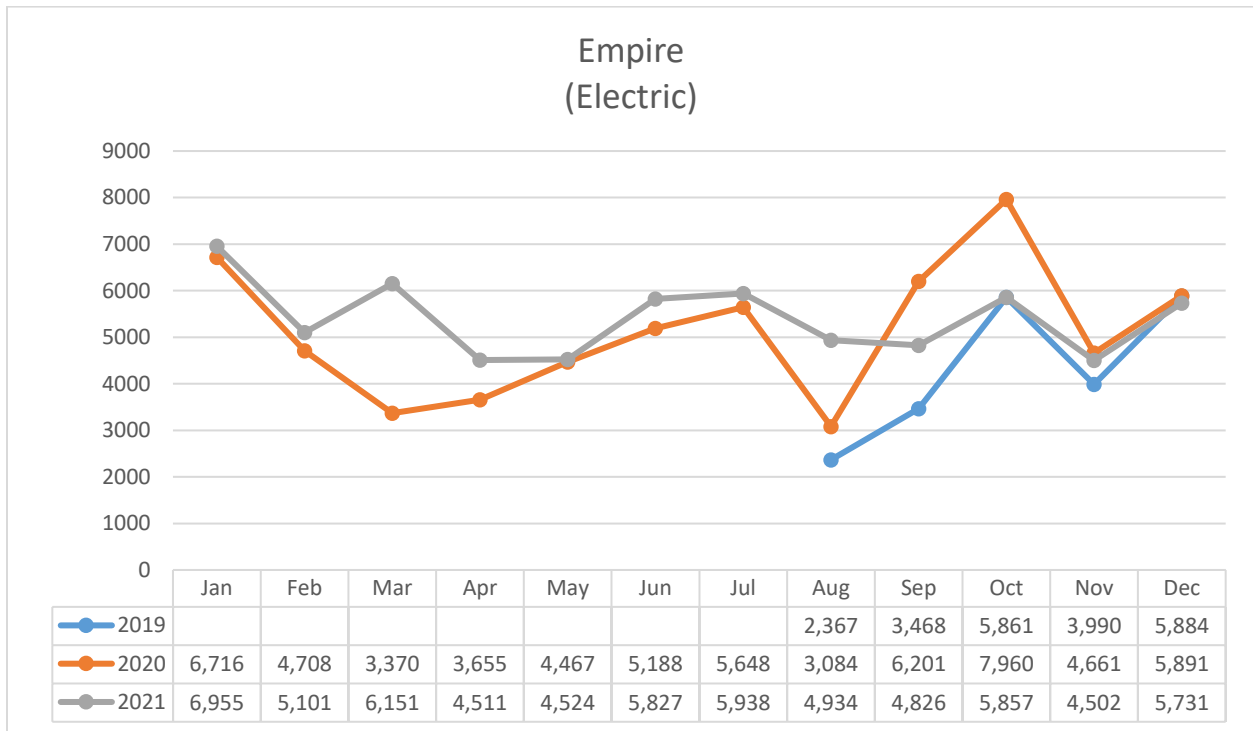
The previous data indicates that there were 18% fewer Empire customers with past-due accounts in December 2021 versus December 2020 and about 2% more customers with past-due accounts in December 2021 compared to November 2021. There were approximately 10% more customers with past-due accounts in December 2021 versus pre-pandemic, December 2019. 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 18% fewer customers who were not disconnected in December 2021 versus December 2020 and approximately 2% more in December 2021 than in November 2021. There were 10% more customers who received a final disconnection notice, but have not been disconnected in December 2021 versus pre-pandemic, December 2019.

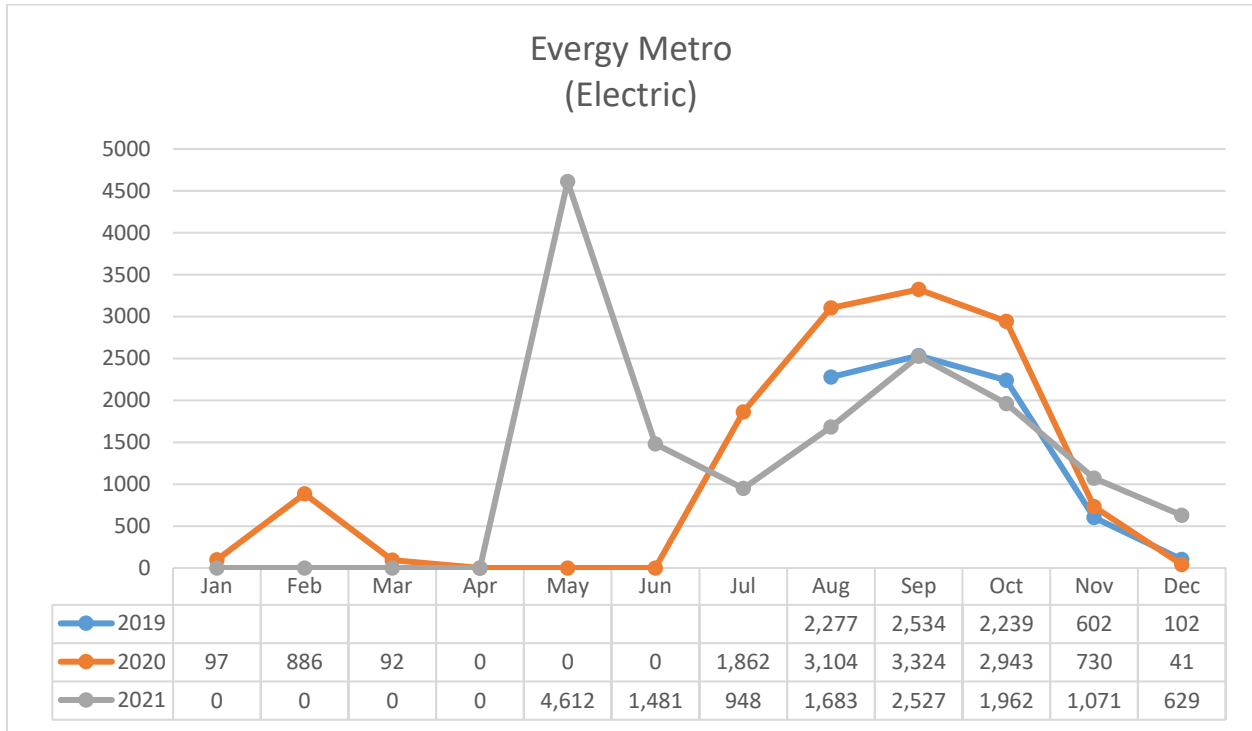
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 3% fewer Empire customers who participated in payment plans in December 2021 versus December 2020 and about 27% more in December 2021 than in November 2021. There were 3% fewer customers participating in payment plans in December 2021 versus pre-pandemic, December 2019.

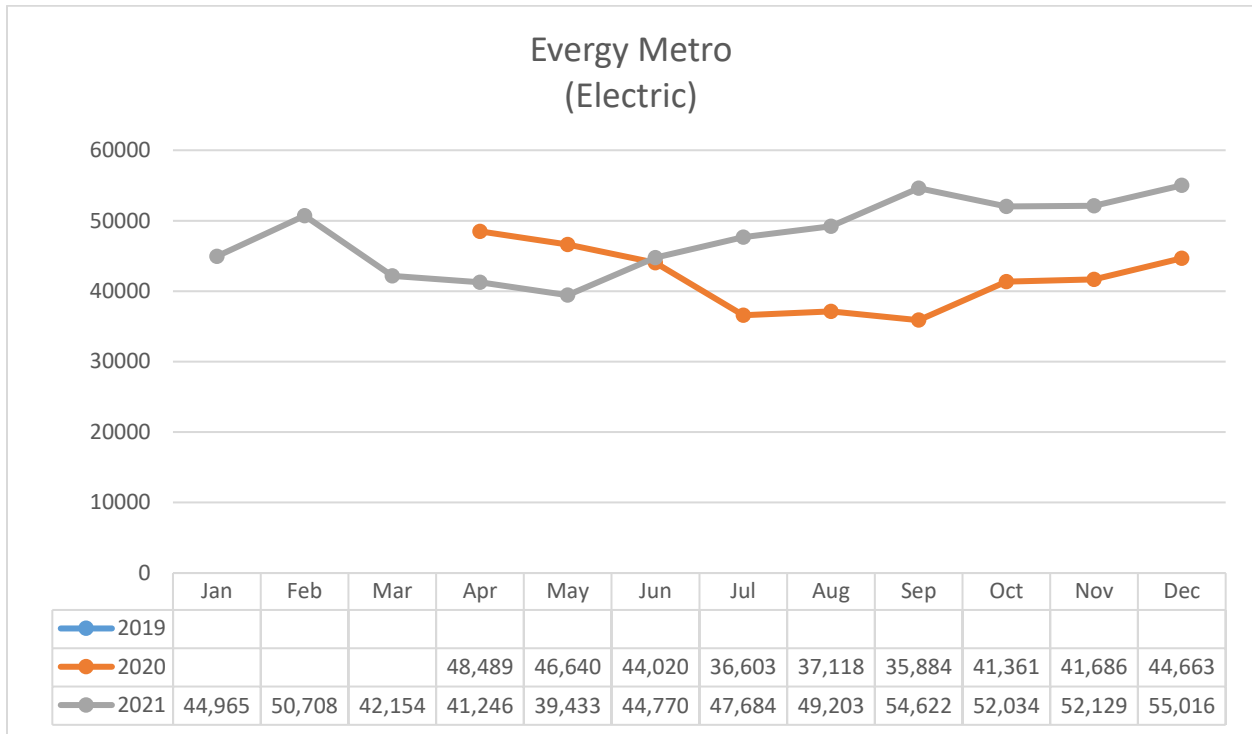
Questions 1 & 3 (Evergy Metro – Electric)

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



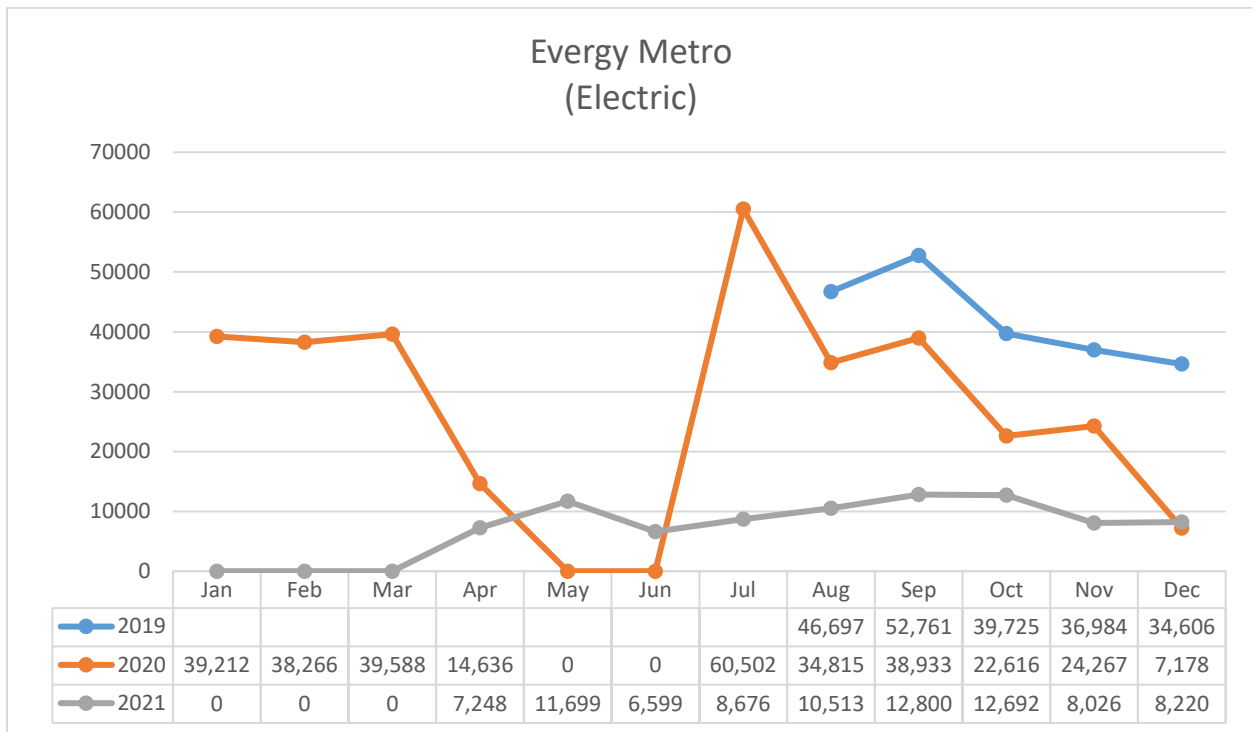
As shown in the previous graph, Evergy Metro performed 1434% more disconnections for non-payment in December 2021 versus December 2020 and about 41% fewer in December 2021 than in November 2021. The number of actual disconnections by Evergy Metro in December 2021 was about 529% above the amount projected by Evergy Metro for the same month. There were approximately 517% more disconnections for non-payment in December 2021 versus pre-pandemic, December 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”



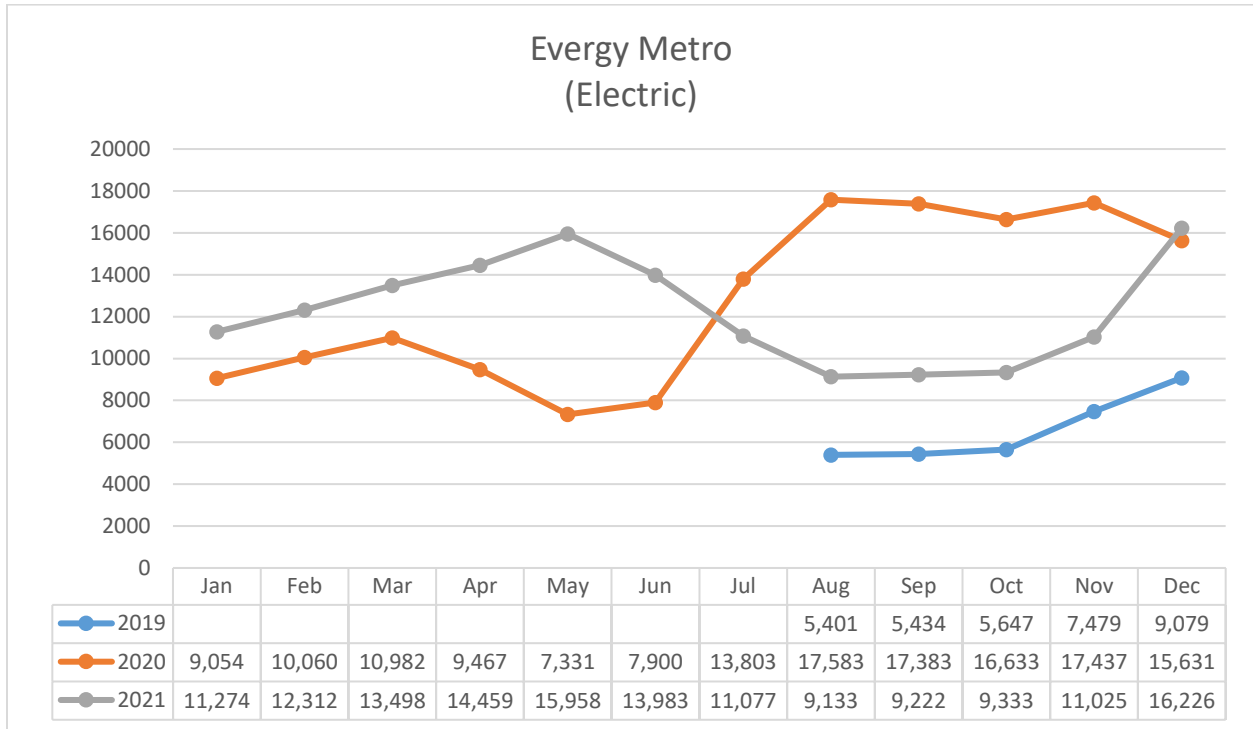
The previous data indicates that there were 23% more Evergy Metro customers with past-due accounts in December 2021 versus December 2020 and approximately 6% more in December 2021 than in November 2021. Staff is unable to compare current past-due accounts to pre-pandemic past-due account numbers as Evergy Metro was unable to provide historical data from August 2019 – March 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 15% more customers who were not disconnected in December 2021 versus December 2020 and approximately 2% more customers in December 2021 than in November 2021. There were 76% fewer customers who received a final disconnection notice, but have not been disconnected for non-payment in December 2021 versus pre-pandemic, December 2019.

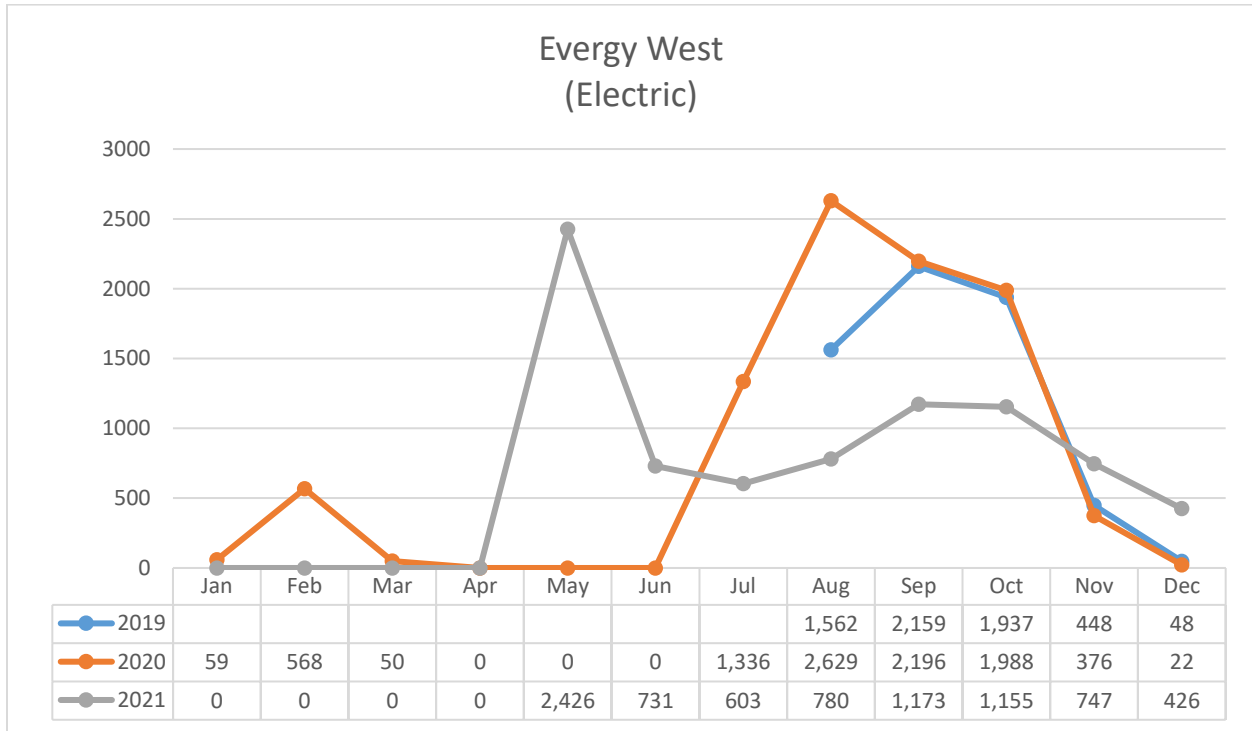
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 4% more Evergy Metro customers who participated in payment plans in December 2021 versus December 2020 and about 47% more in December 2021 than in November 2021. There were 79% more customers participating in payment plans at month-end in December 2021 versus pre-pandemic, December 2019.

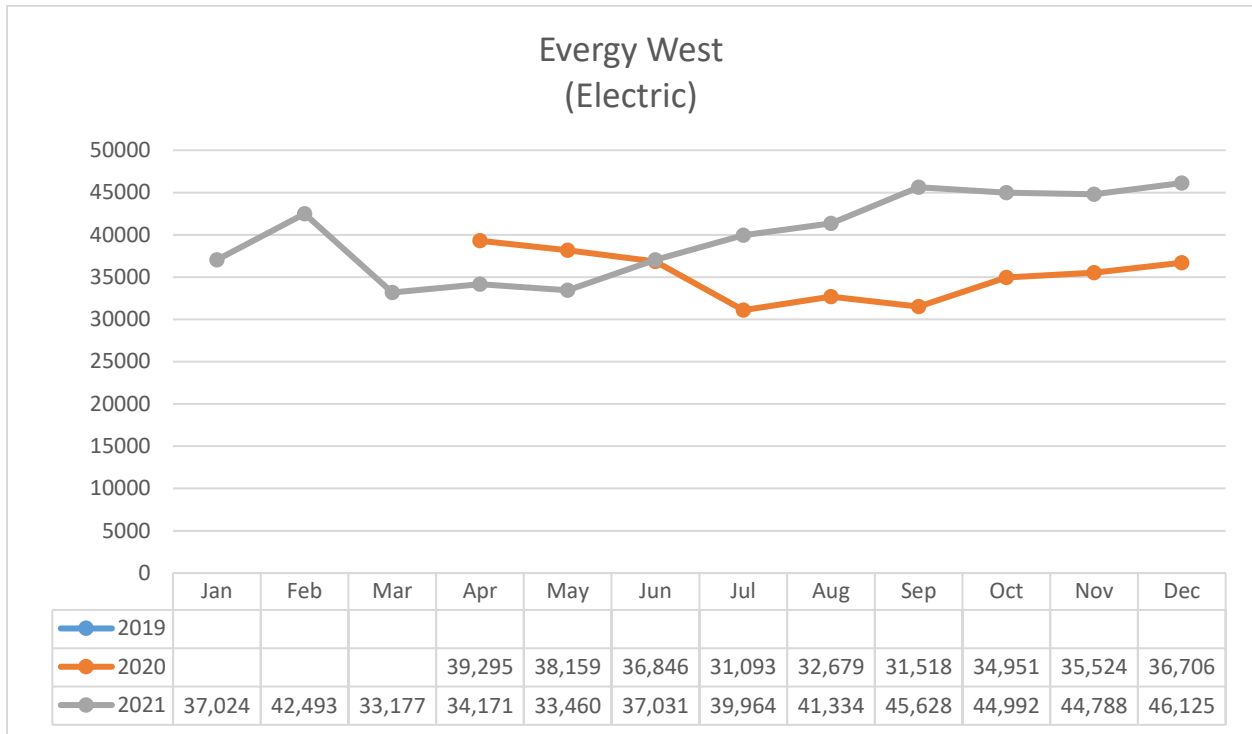
Questions 1 & 3 (Evergy West – Electric)

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



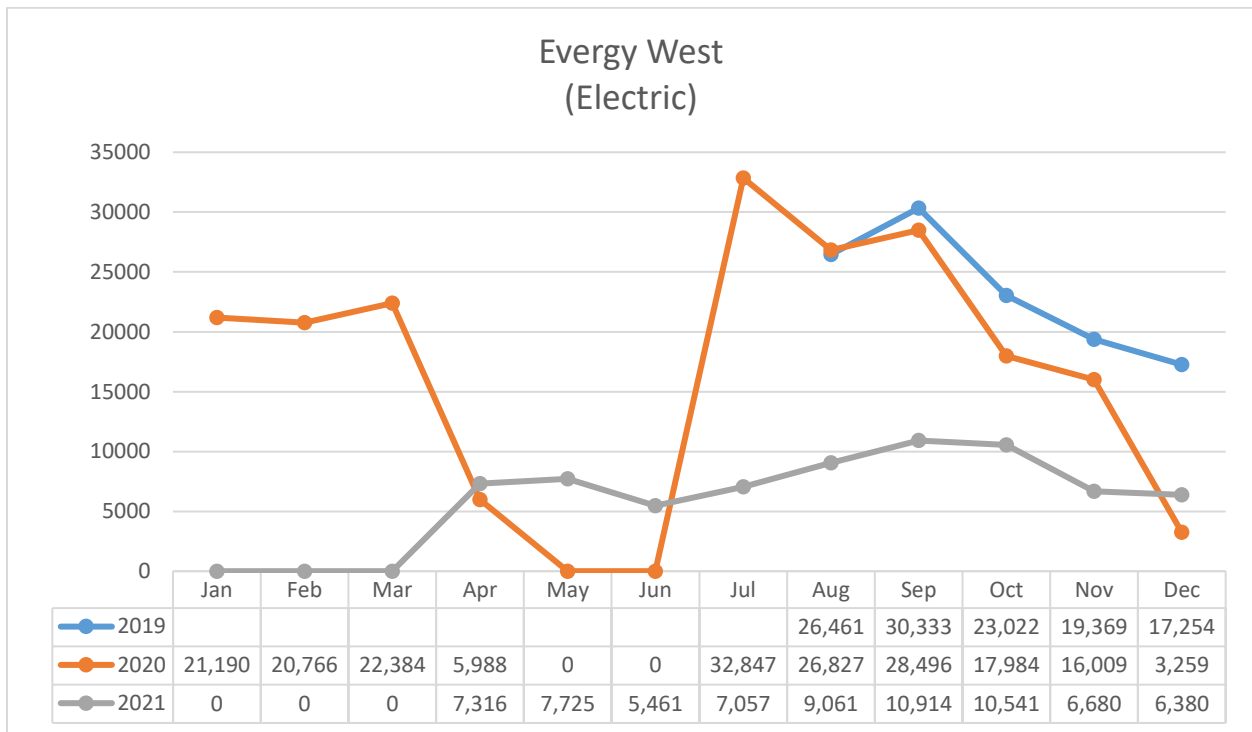
As shown in the previous graph, Evergy West performed 1836% more disconnections for non-payment in December 2021 versus December 2020 and approximately 43% fewer in December 2021 than in November 2021. The number of actual disconnections by Evergy West in December 2021 was 610% more than the amount projected by Evergy West for the same month. The number of disconnections for non-payment of services in December 2021 was 788% more than pre-pandemic, December 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”



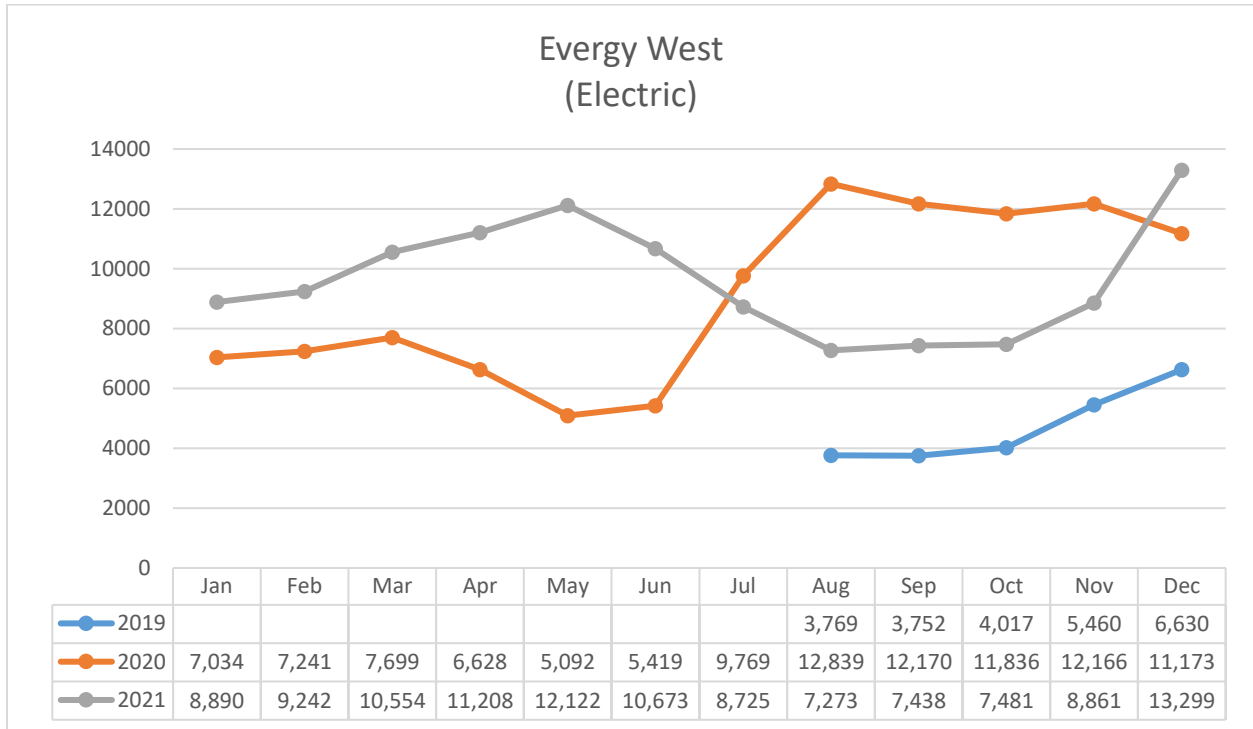
The previous data indicates that there were 26% more Evergy West customers with past-due accounts in December 2021 versus December 2020 and approximately 3% more in December 2021 than in November 2021. Staff is unable to compare current past-due accounts to pre-pandemic past-due account numbers as Evergy West was unable to provide historical data from August 2019 – March 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 96% more customers who were not disconnected in December 2021 versus December 2020 and approximately 4% fewer customers in December 2021 than in November 2021. There are 63% fewer customers who have received a final disconnection notice, but have not been disconnected for non-payment in December 2021 versus pre-pandemic, December 2019.

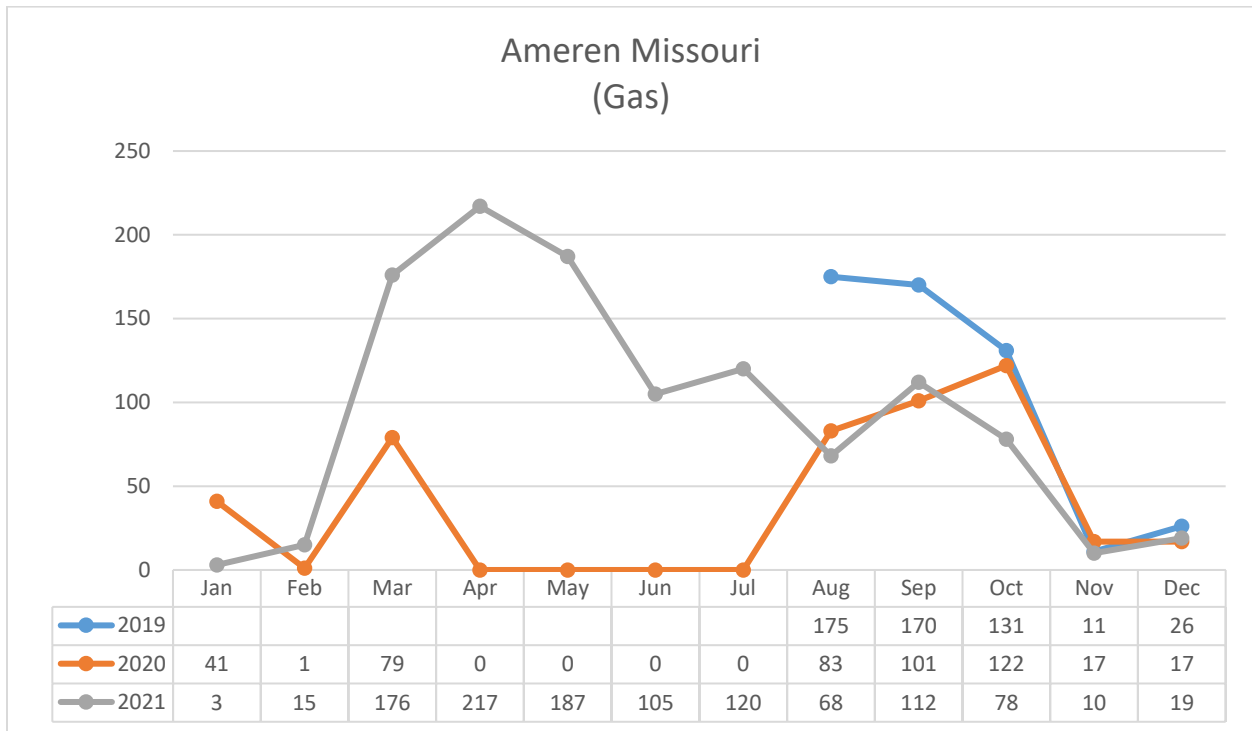
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 19% more Evergy West customers who participated in payment plans in December 2021 versus December 2020 and about 50% more in December 2021 than in November 2021. There were 101% more customers participating in payment plans at month-end in December 2021 versus pre-pandemic, December 2019.

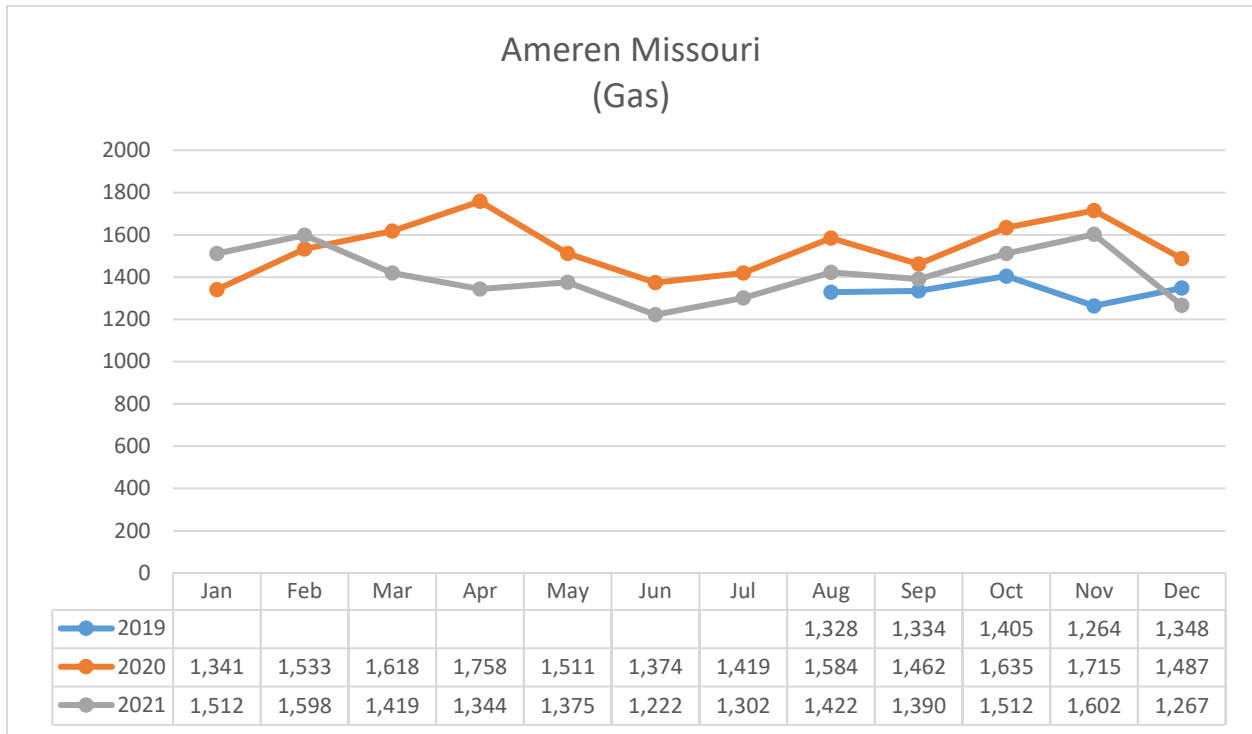
Questions 1 & 3 (Ameren Missouri – Gas)

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



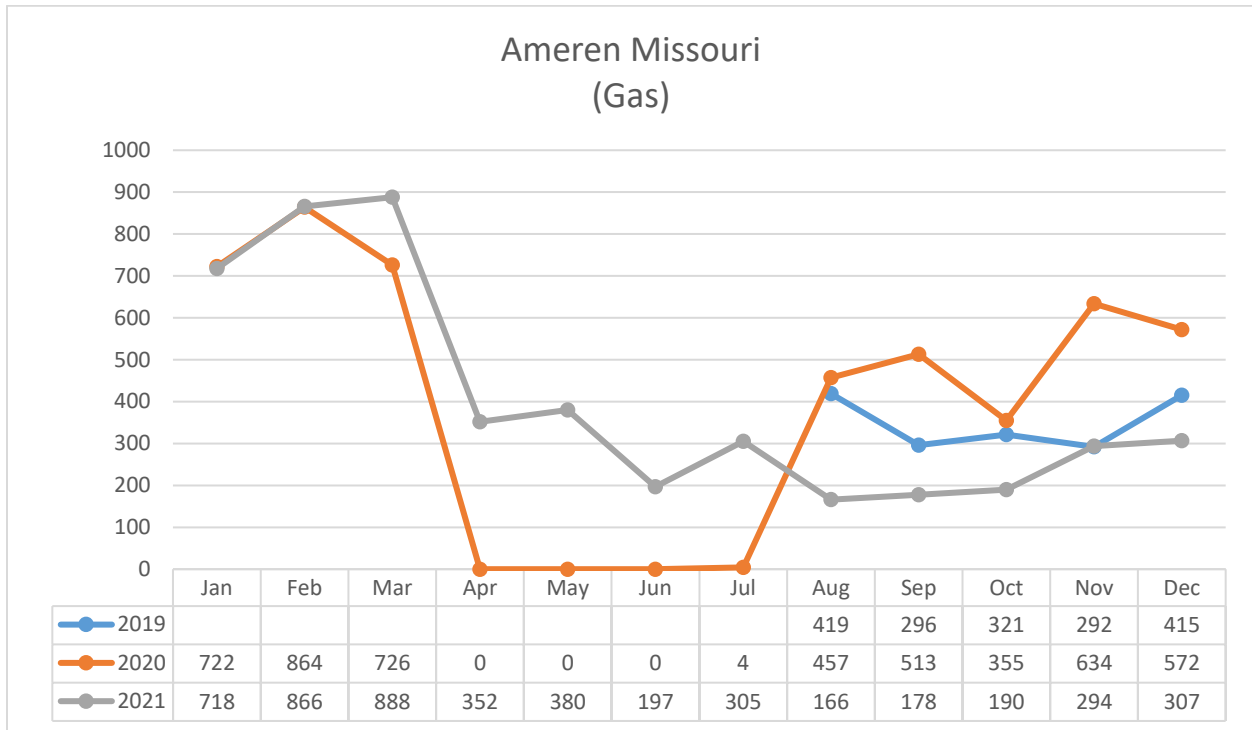
As shown in the previous graph, Ameren Missouri performed 2 more disconnections for non-payment in December 2021 versus December 2020 and 9 more in December 2021 than in November 2021. There were 6 fewer actual disconnections by Ameren Missouri in December 2021 than the amount projected by Ameren Missouri for the same month. There were approximately 7 fewer disconnections for non-payment services in December 2021 versus pre-pandemic, December 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”



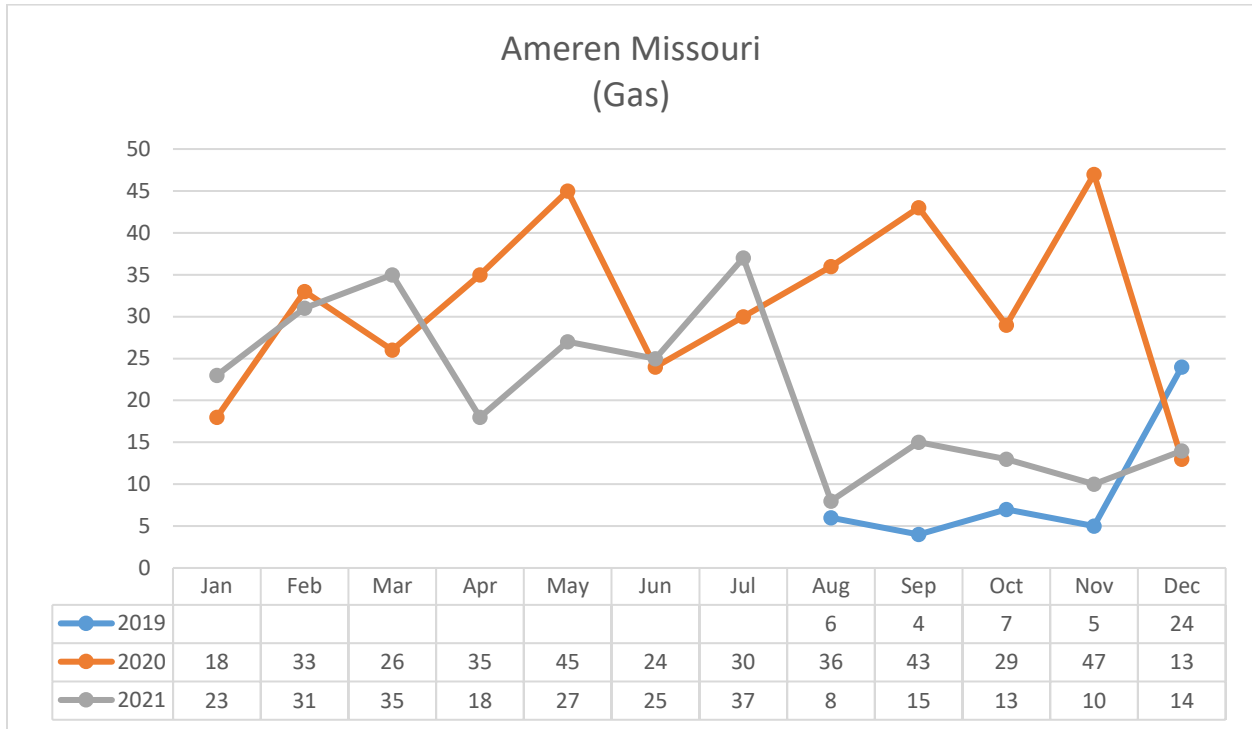
The previous data indicates that there were approximately 15% fewer Ameren Missouri customers with past-due accounts in December 2021 versus December 2020 and approximately 21% fewer in December 2021 than in November 2021. There were about 6% fewer customers with past-due accounts in December 2021 versus pre-pandemic, December 2019. 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 46% fewer customers who were not disconnected in December 2021 versus in December 2020 and approximately 4% more in December 2021 than in November 2021. There were 26% fewer customers who received a final disconnection notice, but have not been disconnected for non-payment in December 2021 versus pre-pandemic, December 2019.

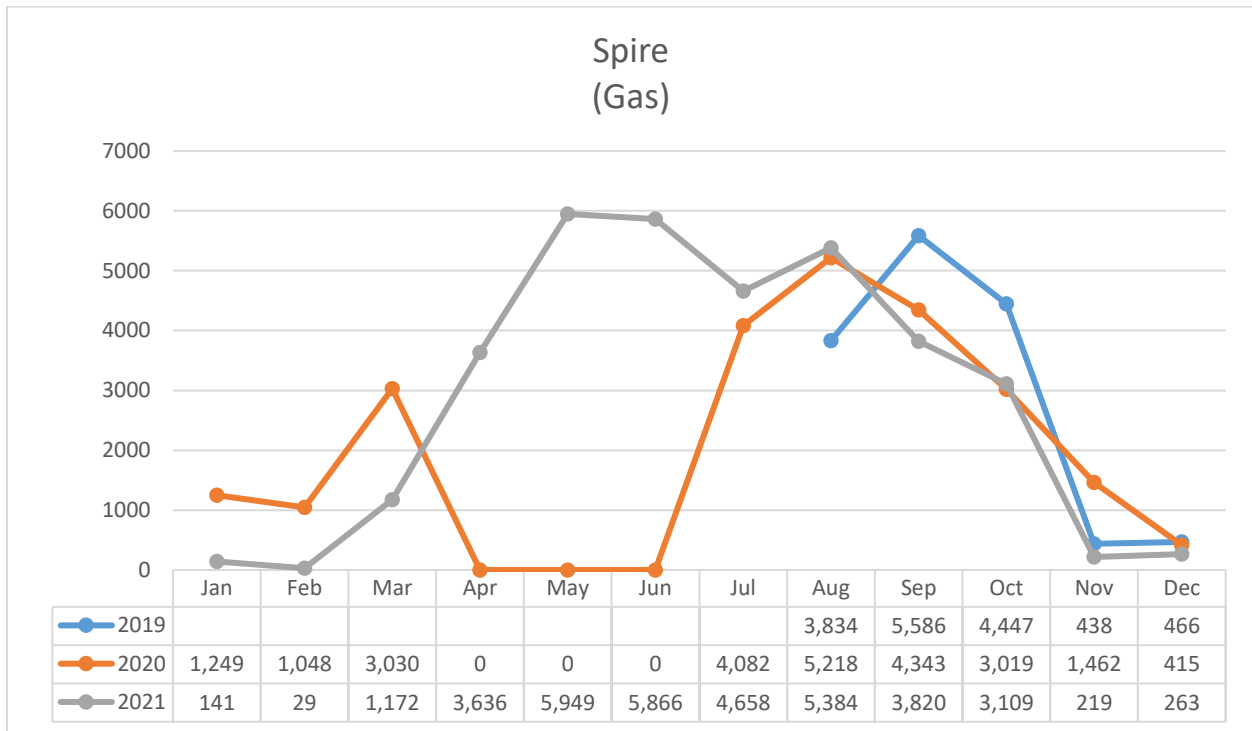
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there was one more Ameren Missouri customer who participated in payment plans in December 2021 versus December 2020 and 4 more customers participating in December 2021 than in November 2021. There were 10 less customers participating in payment plans in December 2021 versus in pre-pandemic, December 2019.

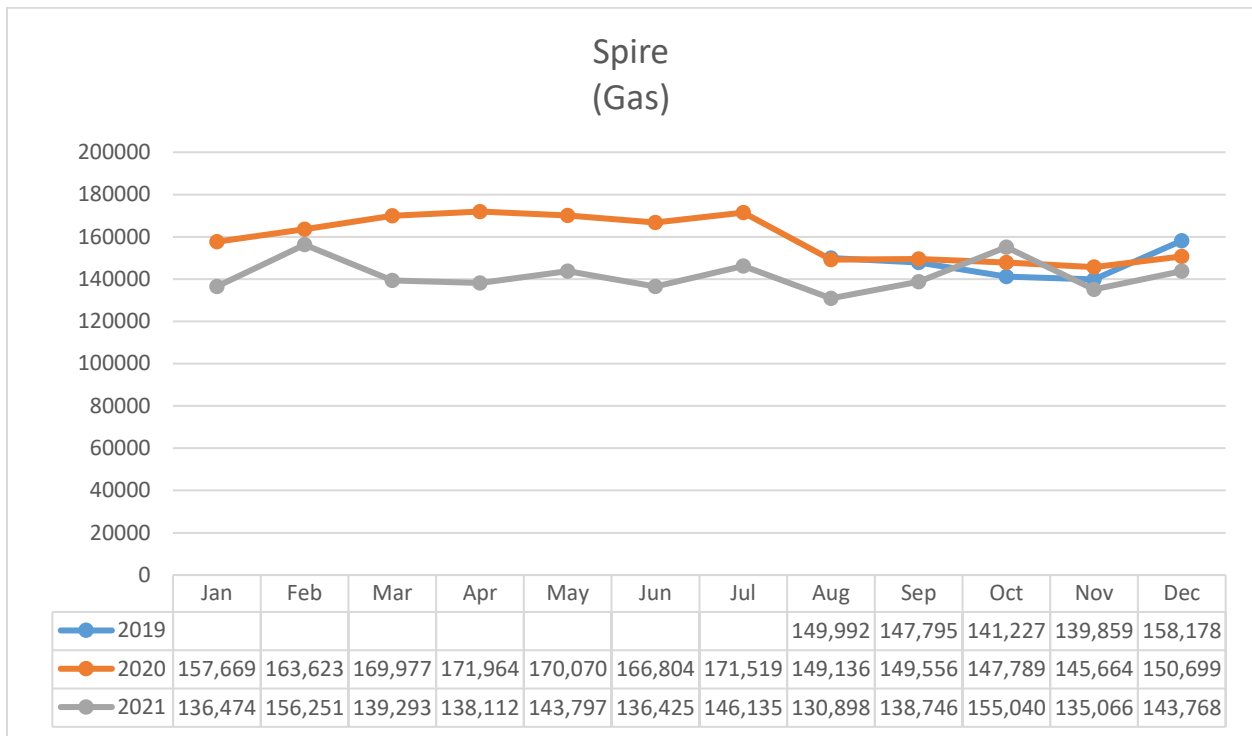
Questions 1 & 3 (Spire - Gas)

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



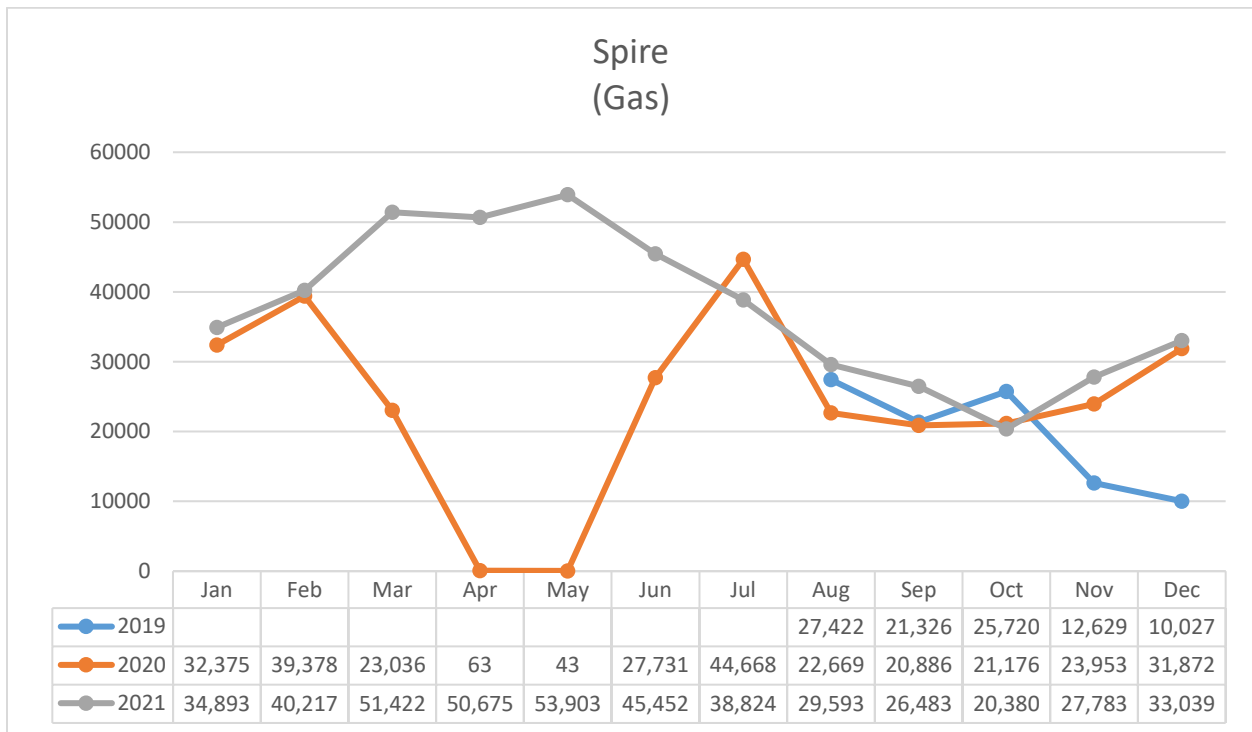
As shown in the previous graph, Spire performed approximately 37% fewer disconnections for non-payment in December 2021 versus December 2020 and approximately 20% more in December 2021 than in November 2021. The number of actual disconnections by Spire in December 2021 was about 73% lower than the amount projected by Spire for the same month. There were 44% fewer disconnections for non-payment in December 2021 versus pre-pandemic, December 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”



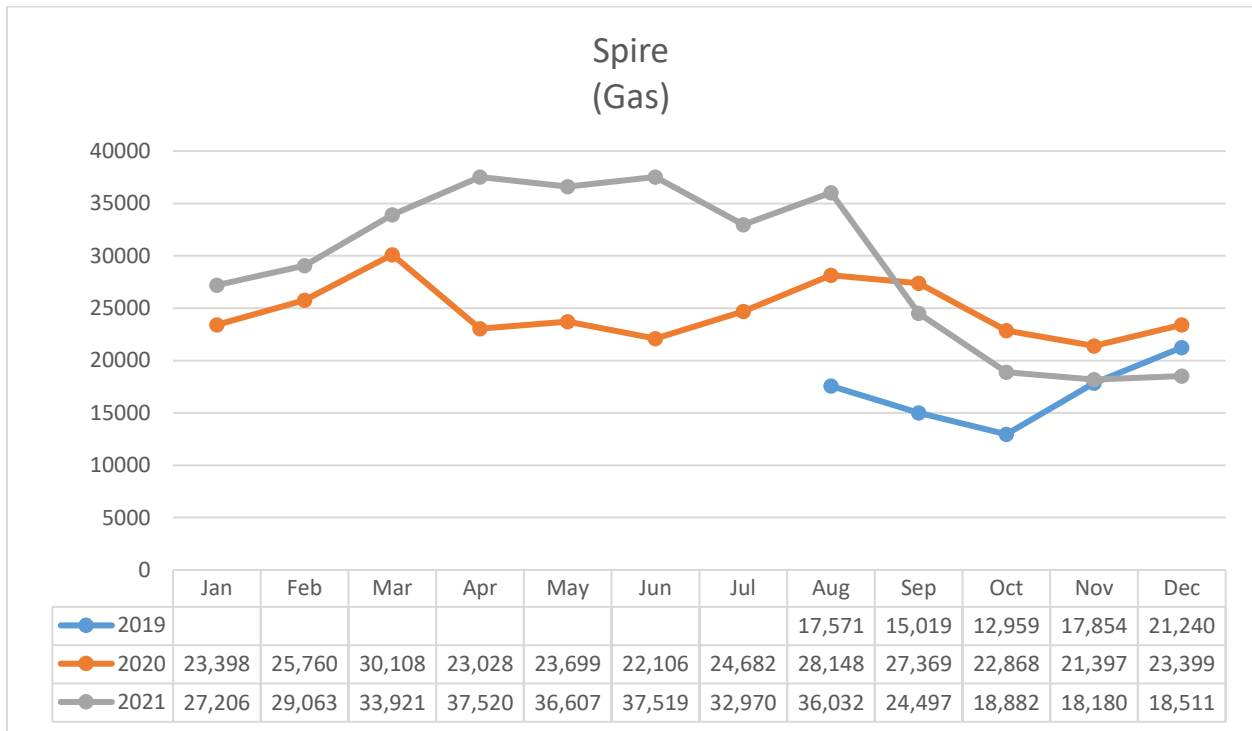
The previous data indicates that there were about 5% fewer Spire customers with past-due accounts in December 2021 versus December 2020 and approximately 6% more in December 2021 than in November 2021. There were about 9% less customers with past-due accounts in December 2021 versus pre-pandemic, December 2019. 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 4% more customers who were not disconnected in December 2021 versus in December 2020 and approximately 19% more in December 2021 than in November 2021. There were 230% more customers who have received a final disconnection notice, but have not been disconnected for non-payment of services in December 2021 versus pre-pandemic, December 2019.

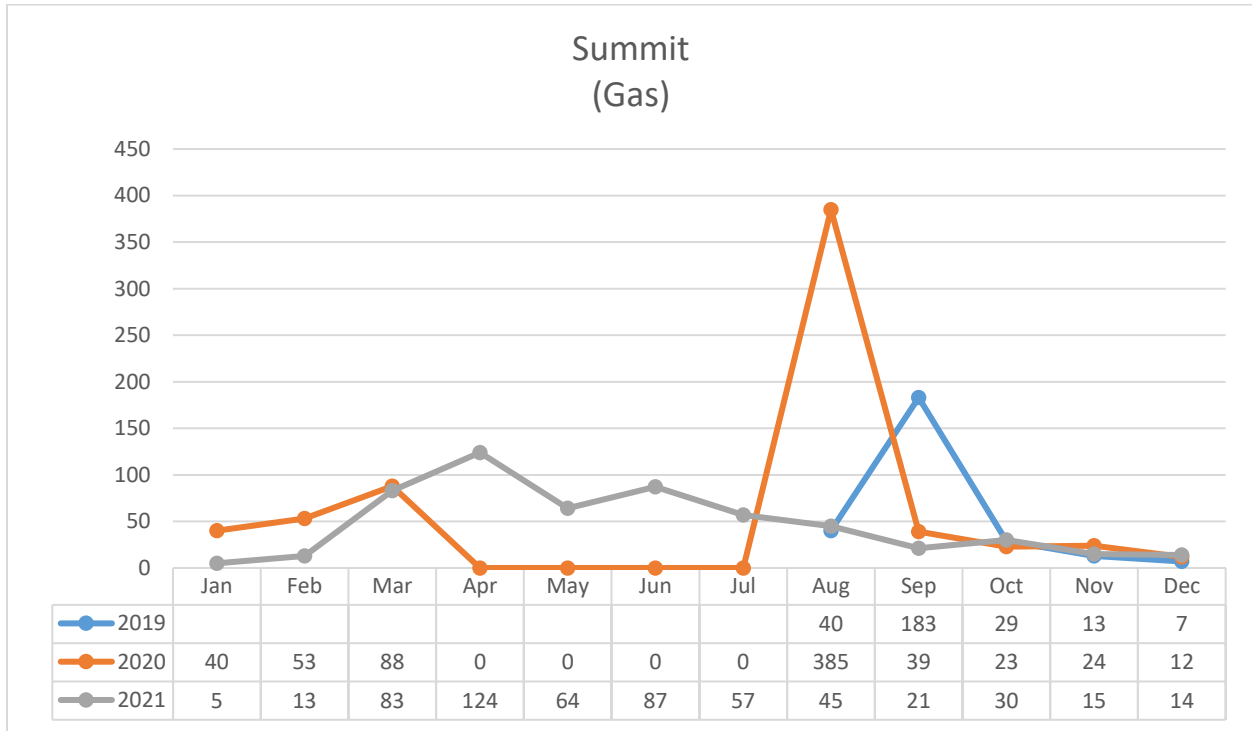
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 21% fewer Spire customers who participated in payment plans in December 2021 versus December 2020 and about 2% more in December 2021 than in November 2021. There were 13% fewer customers participating in payments plans in December 2021 versus pre-pandemic, December 2019.

Questions 1 & 3 (Summit - Gas)⁵

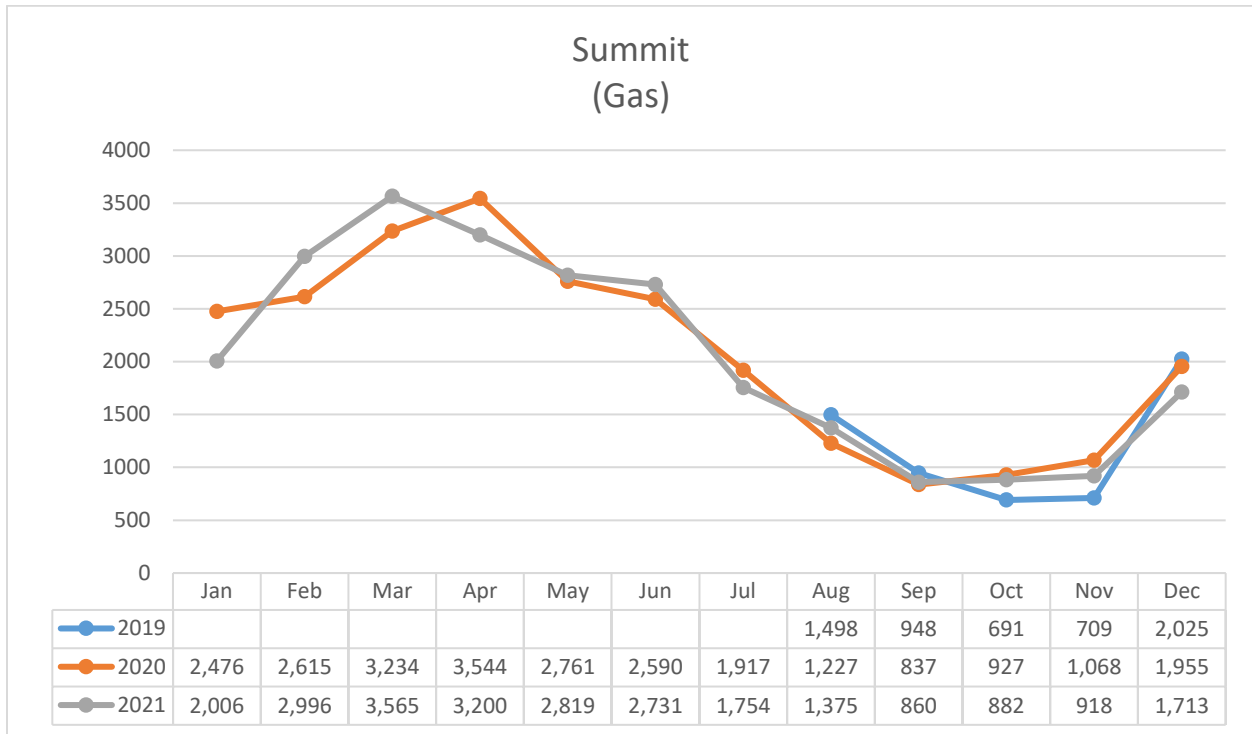
a) The number of disconnections for non-payment of services as of each month-end



As shown in the previous graph, Summit performed 2 more disconnections for non-payment in December 2021 versus December 2020 and 1 less in December 2021 than in November 2021. The number of actual disconnections by Summit in December 2021 was 1 customer above the amount projected by Summit for the same month. There were 14 disconnections for non-payment of services in December 2021 versus 7 disconnections pre-pandemic, December 2019.

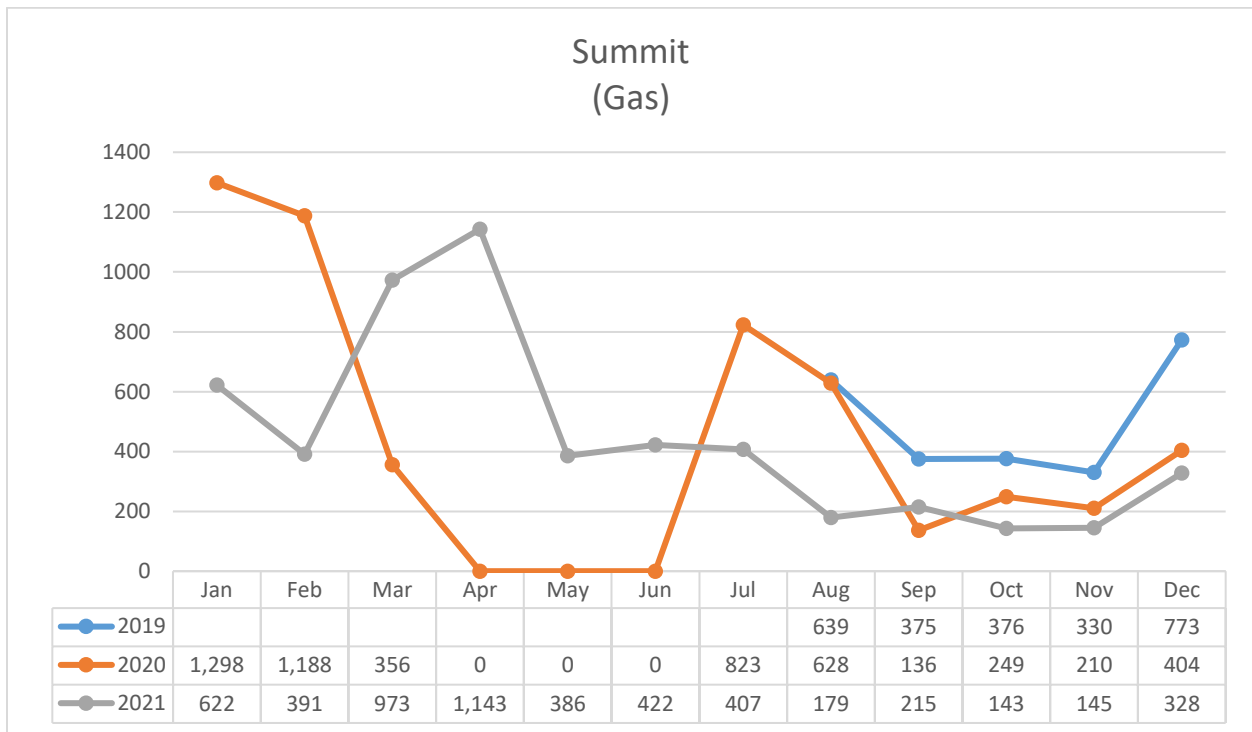
⁵ Correspondence sent regarding discrepancy in past numbers. No response as of date of drafting this report. Will include explanation in next month's report and updated numbers if applicable.

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”



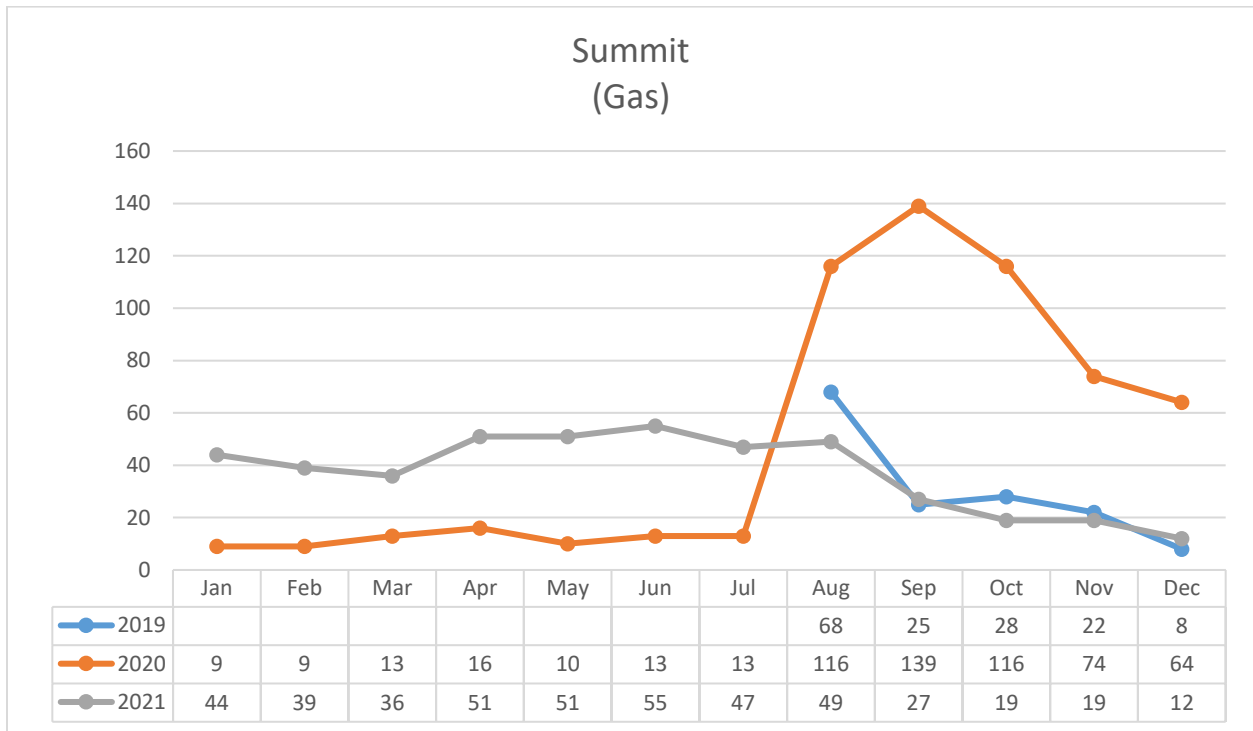
The previous data indicates that there were about 12% fewer Summit customers with past-due accounts in December 2021 versus December 2020 and approximately 87% more in December 2021 than in November 2021. There were approximately 15% less customers with past-due accounts as of month-end in December 2021 versus pre-pandemic, December 2019. 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 approximately 19% fewer customers who were not disconnected in December 2021 versus December 2020 and approximately 126% more in December 2021 than in November 2021. There were 58% fewer customers who have received a final disconnection notice, but have not been disconnected for non-payment of services in December 2021 versus pre-pandemic, December 2019.

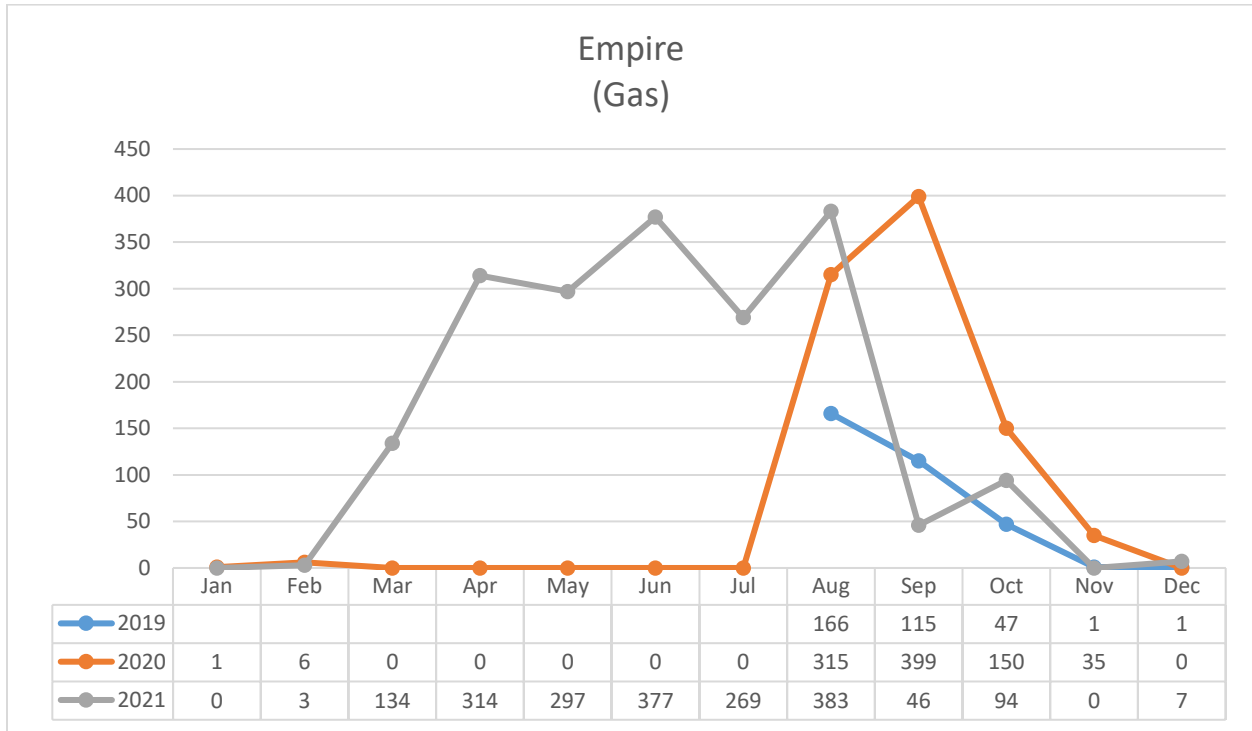
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 81% fewer Summit customers who participated in payment plans in December 2021 versus December 2020 and 7 fewer customers who participated in payment plans in December 2021 than in November 2021. There were 4 more customers participating in payment plans in December 2021 versus pre-pandemic, December 2019.

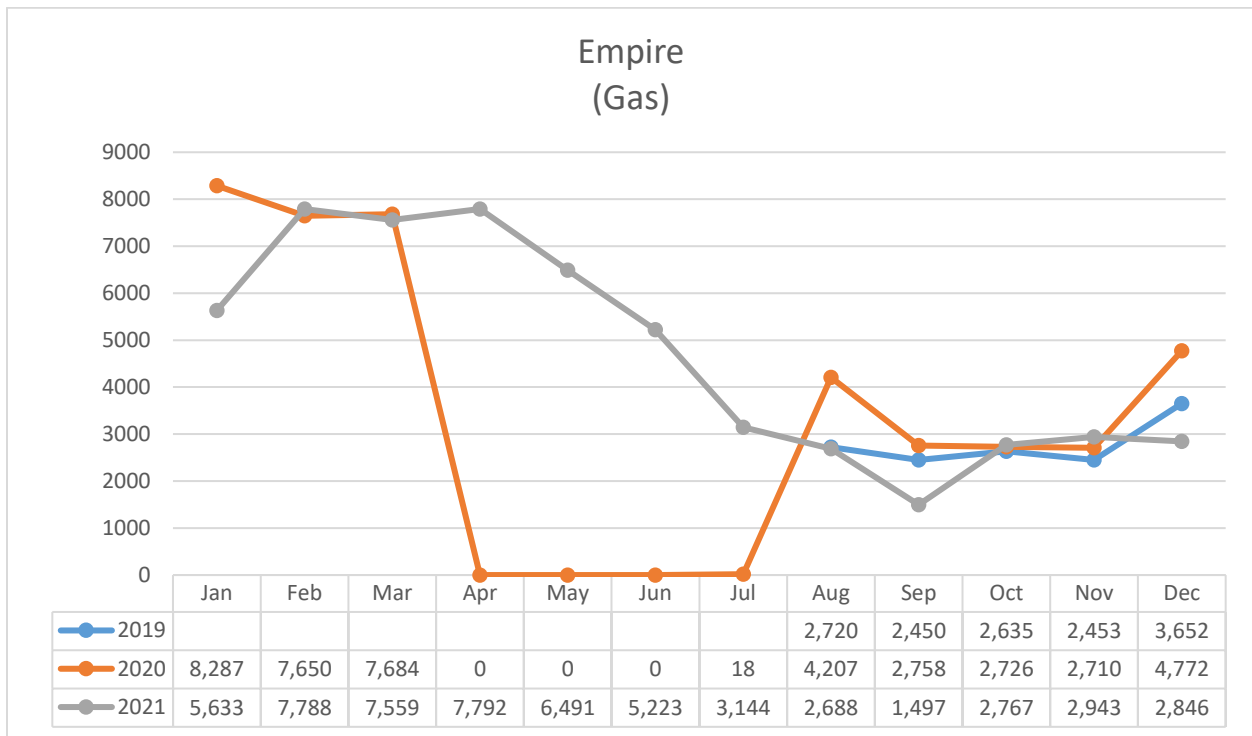
Questions 1 & 3 (Empire - Gas)

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



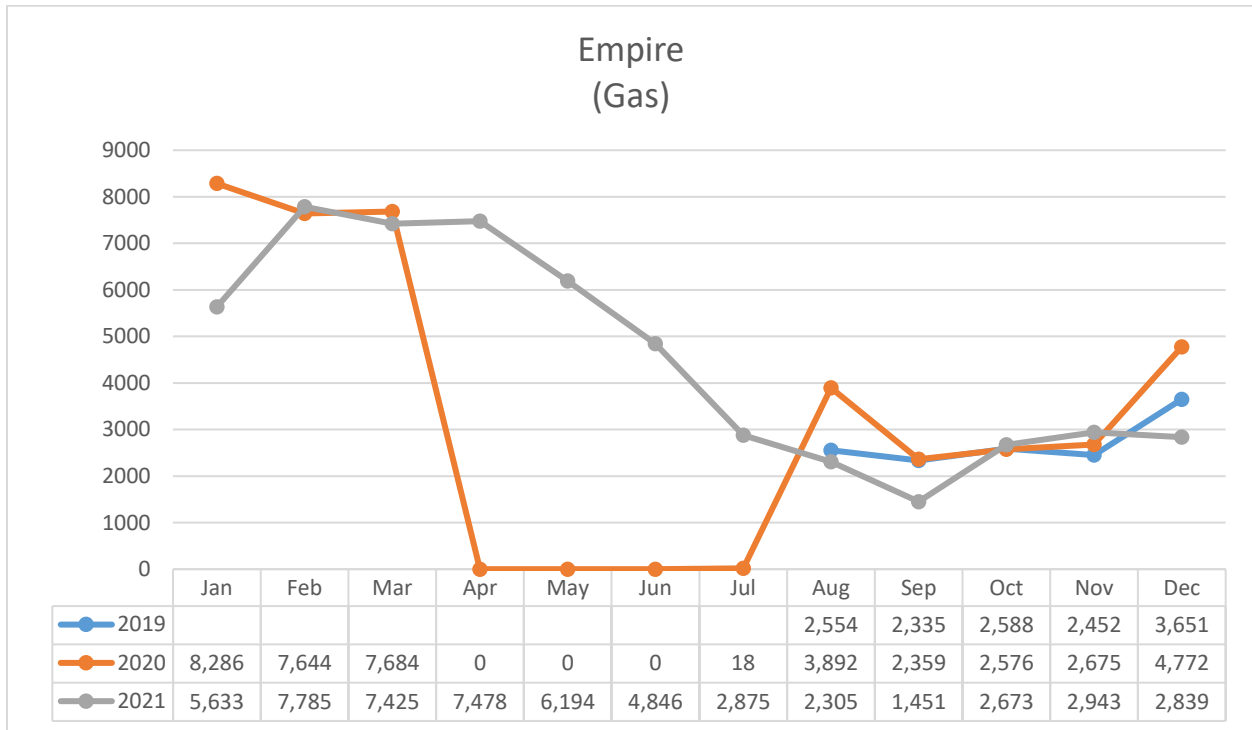
As shown in the previous graph, Empire performed 7 disconnections for non-payment in December 2021 versus 0 in December 2020 and 7 in December 2021 versus 0 in November 2021. The number of actual disconnections by Empire in December 2021 was 7 and above the 0 disconnections projected by Empire for the same month. There were 7 disconnections for non-payment of services in December 2021 versus 1 pre-pandemic, December 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”



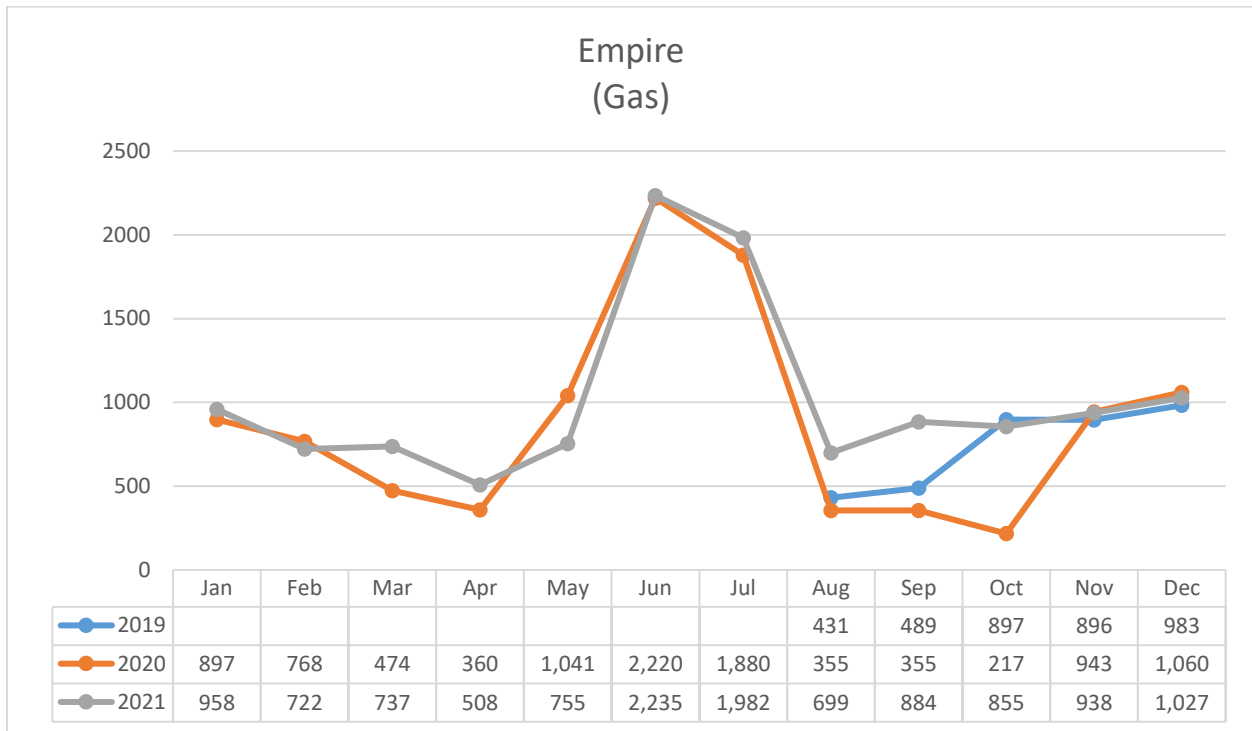
The previous data indicates that there were approximately 40% fewer Empire customers with past-due accounts in December 2021 versus December 2020 and approximately 3% fewer in December 2021 than in November 2021. There were 22% fewer customers with past-due accounts in December 2021 versus pre-pandemic, December 2019. 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 approximately 41% fewer customers who were not disconnected in December 2021 versus December 2020 and approximately 4% fewer in December 2021 than in November 2021. There were 22% fewer customers who have received a final disconnection notice, but have not been disconnected in December 2021 versus pre-pandemic, December 2019.

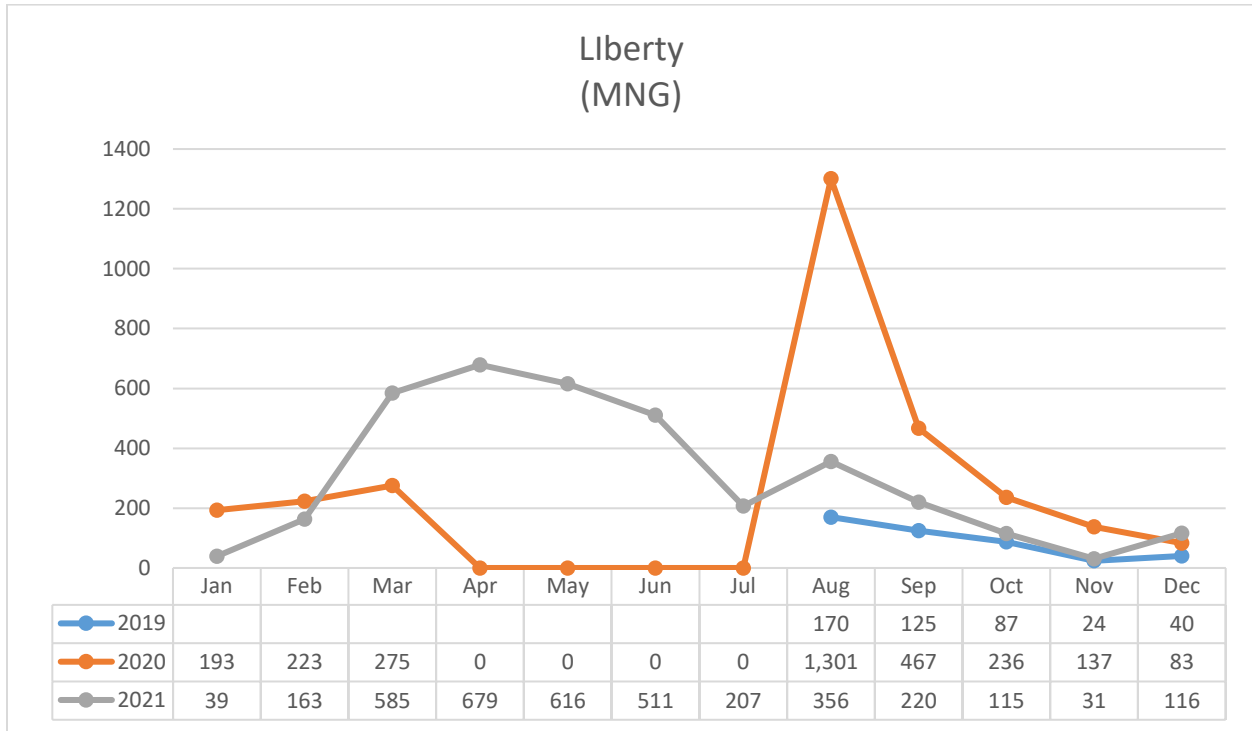
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were 3% fewer Empire customers who participated in payment plans in December 2021 versus December 2020 and about 9% more in December 2021 than in November 2021. There were about 4% more customers participating in payment plans in December 2021 versus pre-pandemic, December 2019.

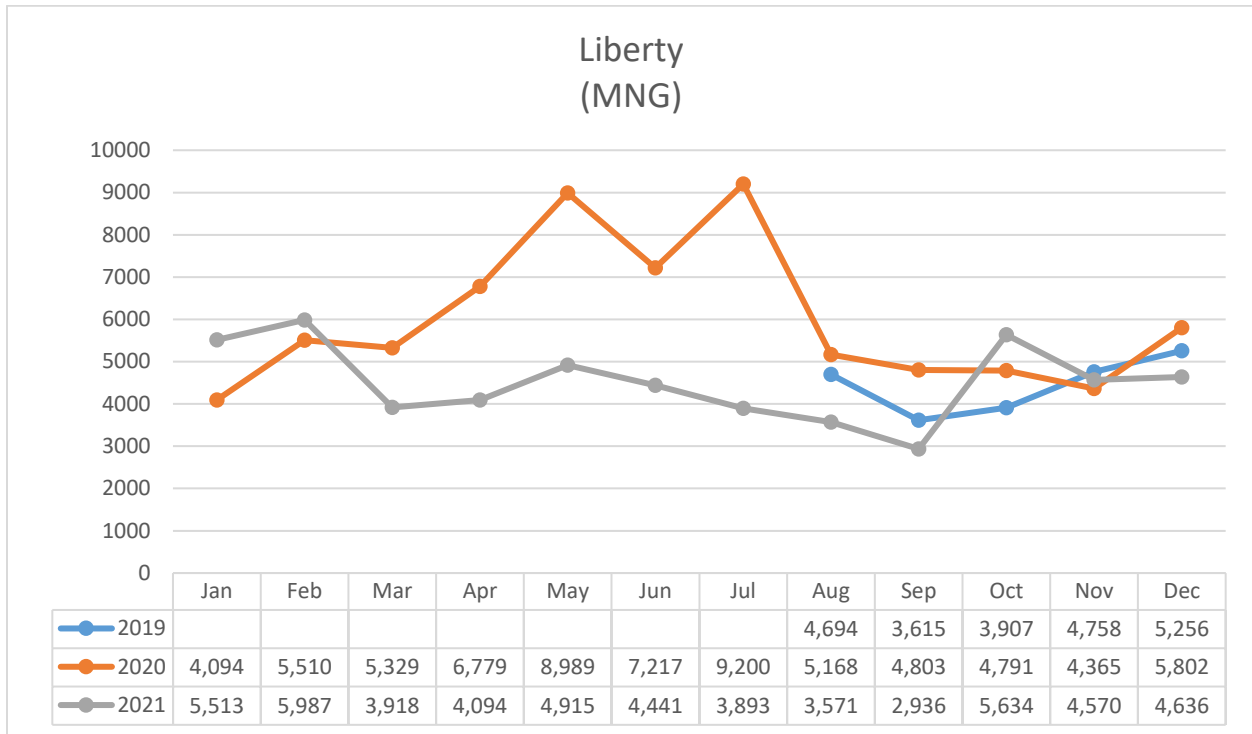
Questions 1 & 3 (Liberty (MNG) - Gas)

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



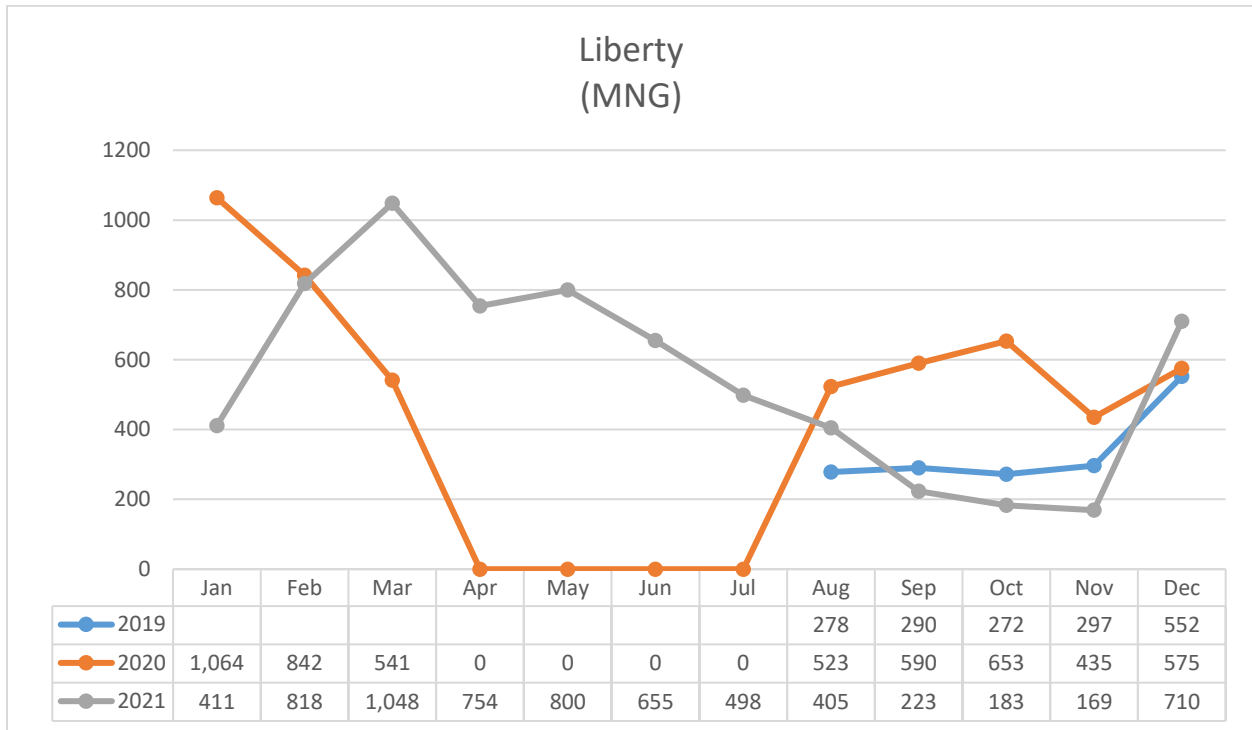
As shown in the previous graph, Liberty (MNG) performed 40% more disconnections for non-payment in December 2021 versus December 2020 and about 274% more in December 2021 than in November 2021. The number of actual disconnections by Liberty (MNG) in December 2021 was 16% above the amount projected by Liberty (MNG) for the same month. There were approximately 190% more disconnections for non-payment in December 2021 versus pre-pandemic, December 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”



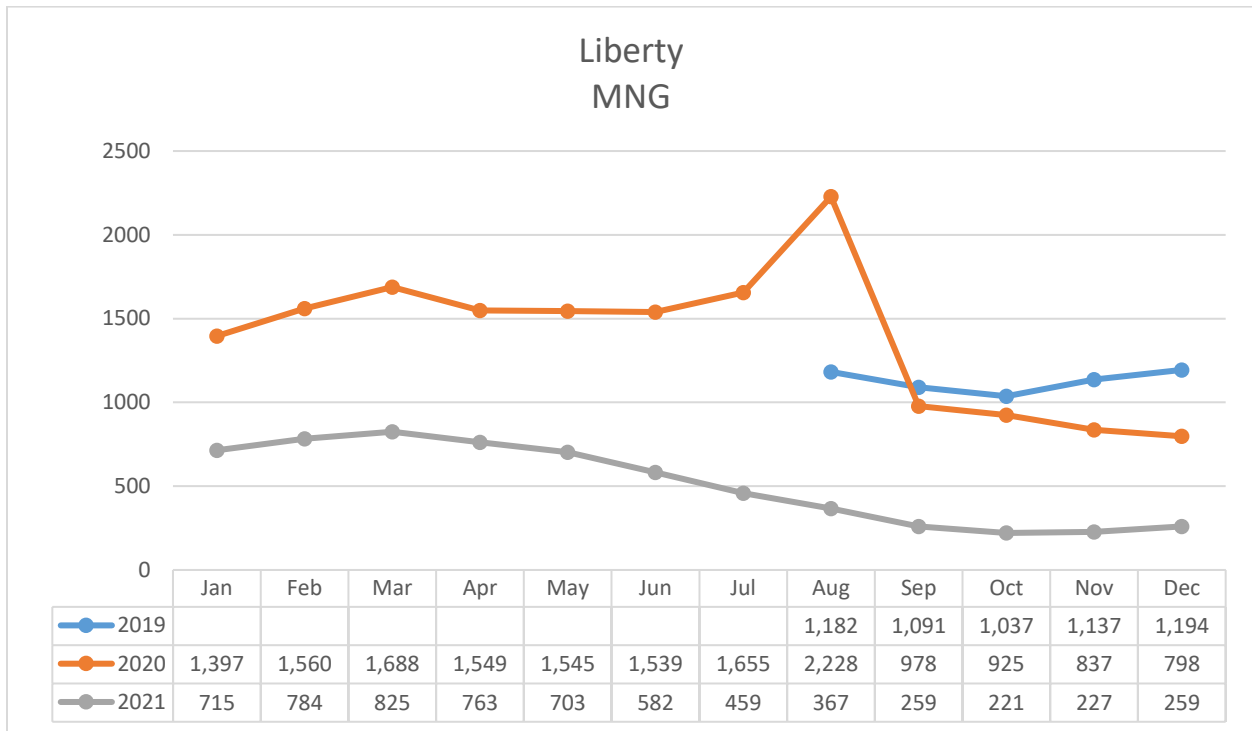
The previous data indicates that there were approximately 20% fewer Liberty (MNG) customers with past-due accounts in December 2021 versus December 2020 and approximately 1% more in December 2021 than in November 2021. There were approximately 12% fewer customers with past-due accounts in December 2021 versus pre-pandemic, December 2019. 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 23% more customers who were not disconnected in December 2021 versus December 2020 and approximately 320% more in December 2021 than in November 2021. There were 29% more customers who received a final disconnection notice but were not disconnected in December 2021 versus pre-pandemic, December 2019.

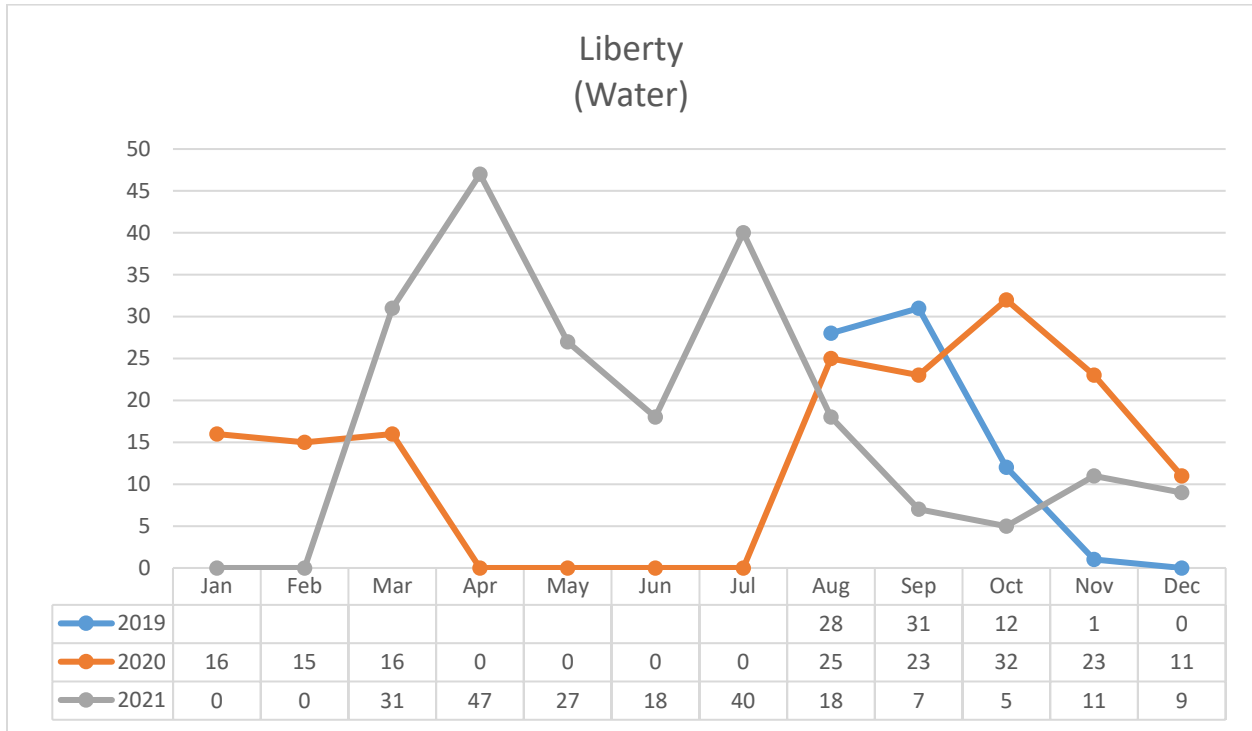
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 68% fewer Liberty (MNG) customers who participated in payment plans in December 2021 versus December 2020 and 14% more customers in December 2021 than in November 2021. There were 78% fewer customers participating in payment plans in December 2021 versus pre-pandemic, December 2019.

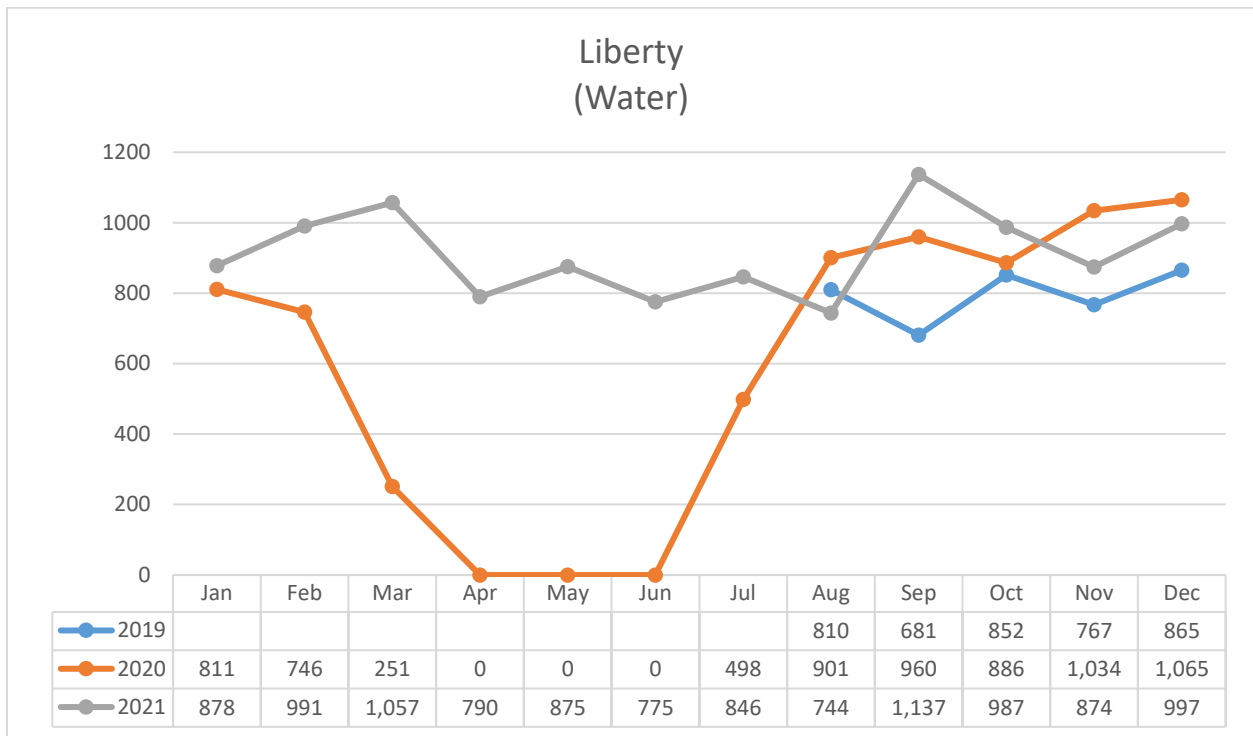
Questions 1 & 3 (Liberty - Water)

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



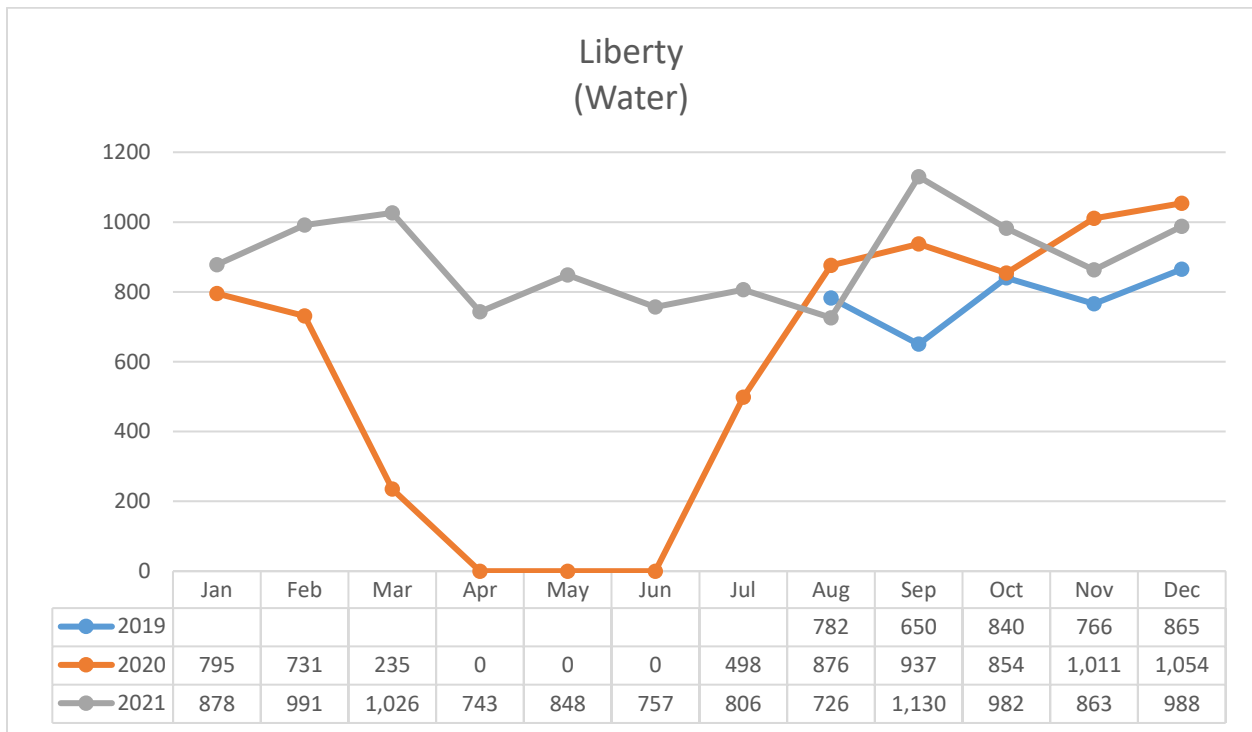
As shown in the previous graph, Liberty performed 2 fewer disconnections for non-payment in December 2021 versus December 2020 and 2 fewer in December 2021 than in November 2021. The number of actual disconnections by Liberty in December 2021 was 1 below the amount projected by Liberty for the same month. There were 9 more disconnections for non-payment in December 2021 versus pre-pandemic, December 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”



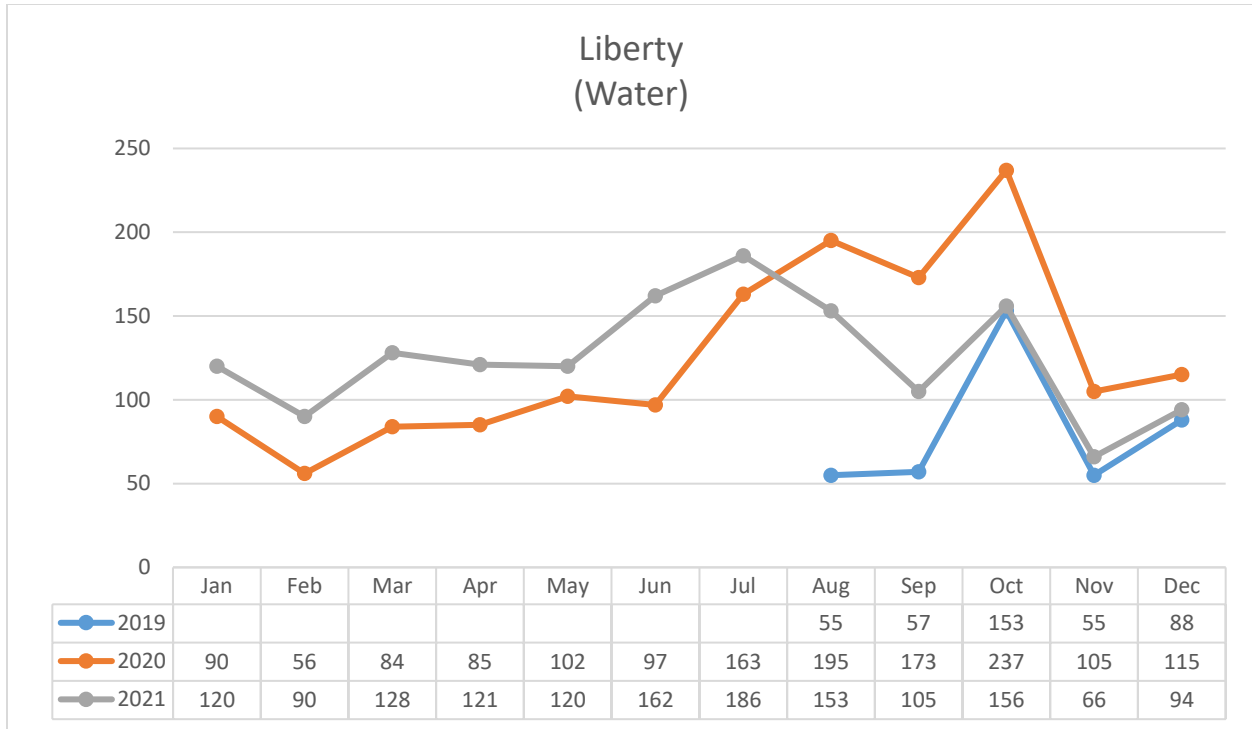
The previous data indicates that there were 6% fewer Liberty customers with past-due accounts in December 2021 versus December 2020 and approximately 14% more in December 2021 than in November 2021. There were about 15% more customers with past-due accounts in December 2021 versus pre-pandemic, December 2019. 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 6% fewer customers who were not disconnected in December 2021 versus December 2020 and approximately 14% more in December 2021 than in November 2021. There were 14% more customers who received a final disconnection notice, but have not been disconnected for non-payment in December 2021 versus pre-pandemic, December 2019.

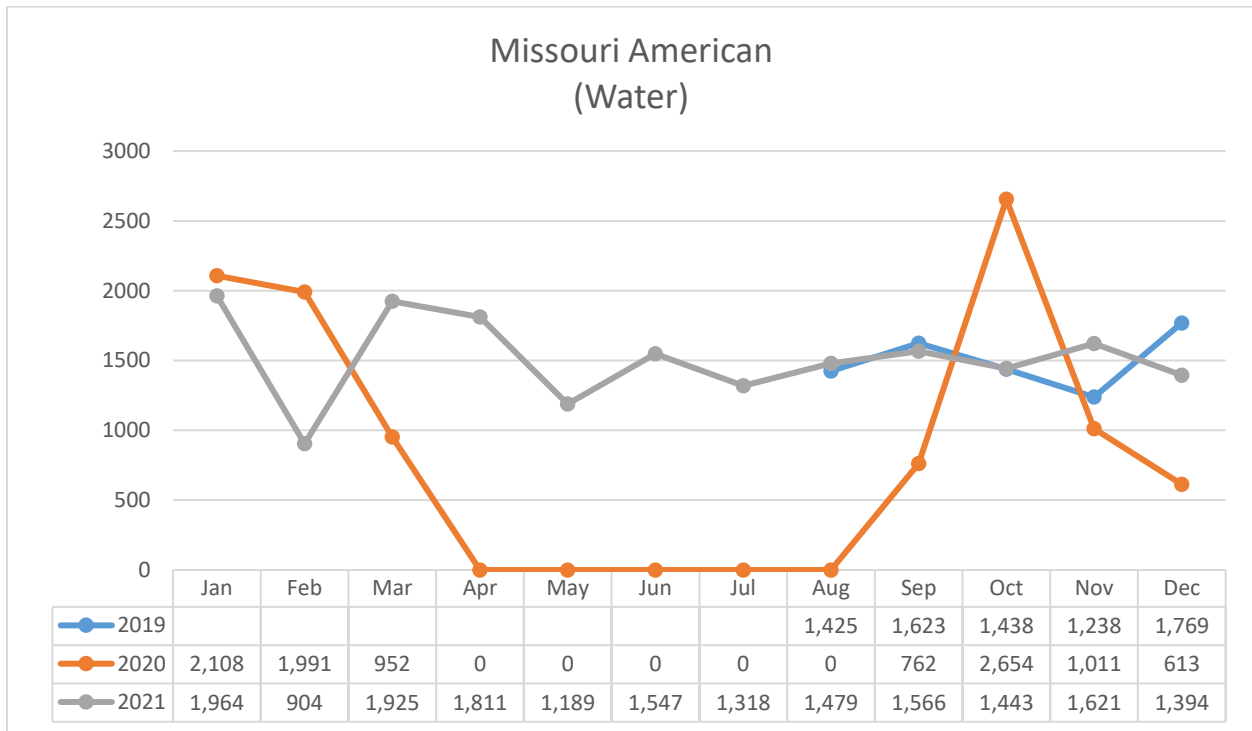
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 18% fewer Liberty customers who participated in payment plans in December 2021 versus December 2020 and about 42% more in December 2021 than in November 2021. There were 6 more customers participating in payment plans in December 2021 versus pre-pandemic, December 2019.

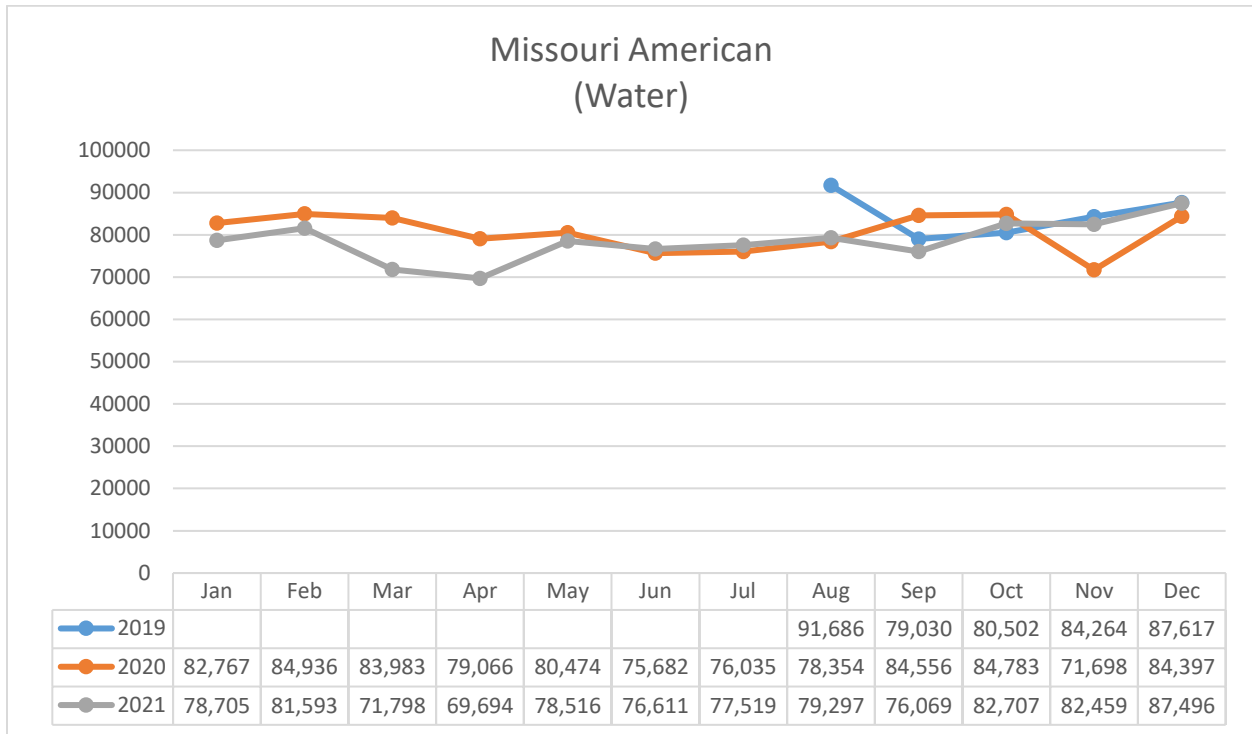
Questions 1 & 3 (Missouri-American - Water)

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



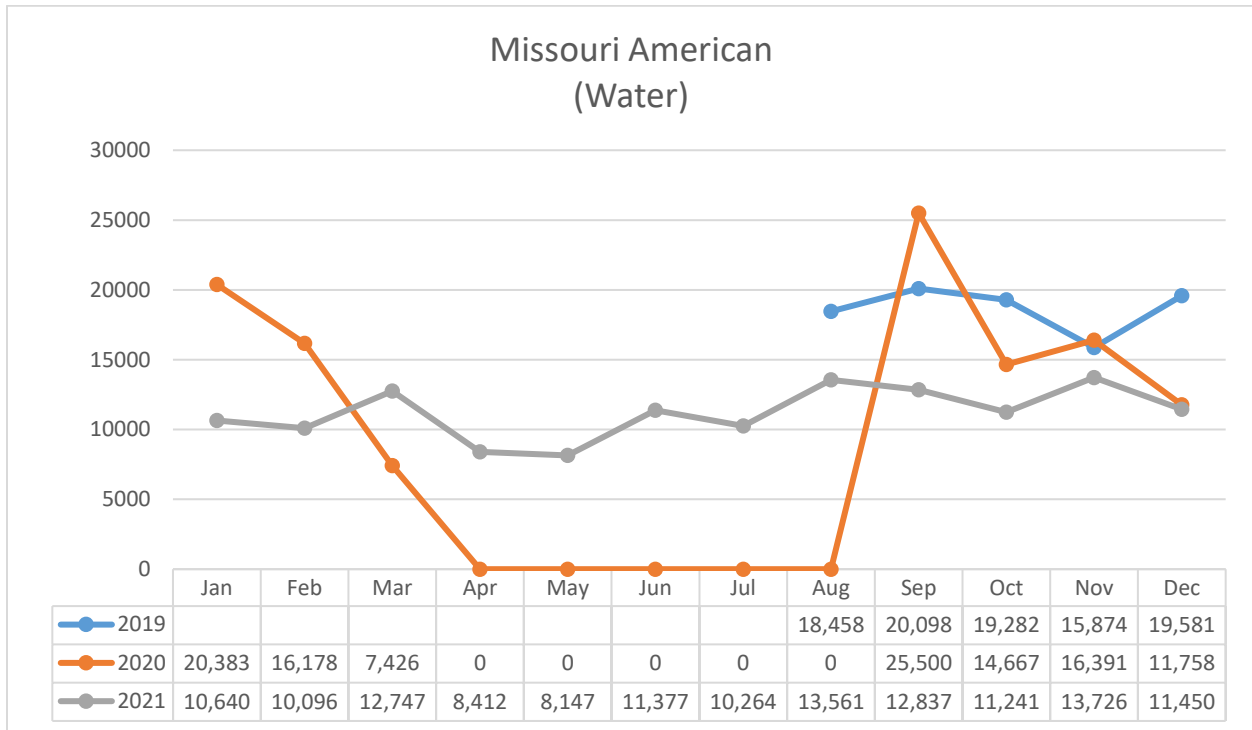
As shown in the previous graph, Missouri-American performed about 127% more disconnections for non-payment in December 2021 versus December 2020 and about 14% fewer in December 2021 than in November 2021. Missouri-American does not forecast the number of disconnections for non-payment. There were less than 21% fewer disconnections for non-payment in December 2021 versus pre-pandemic, December 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”



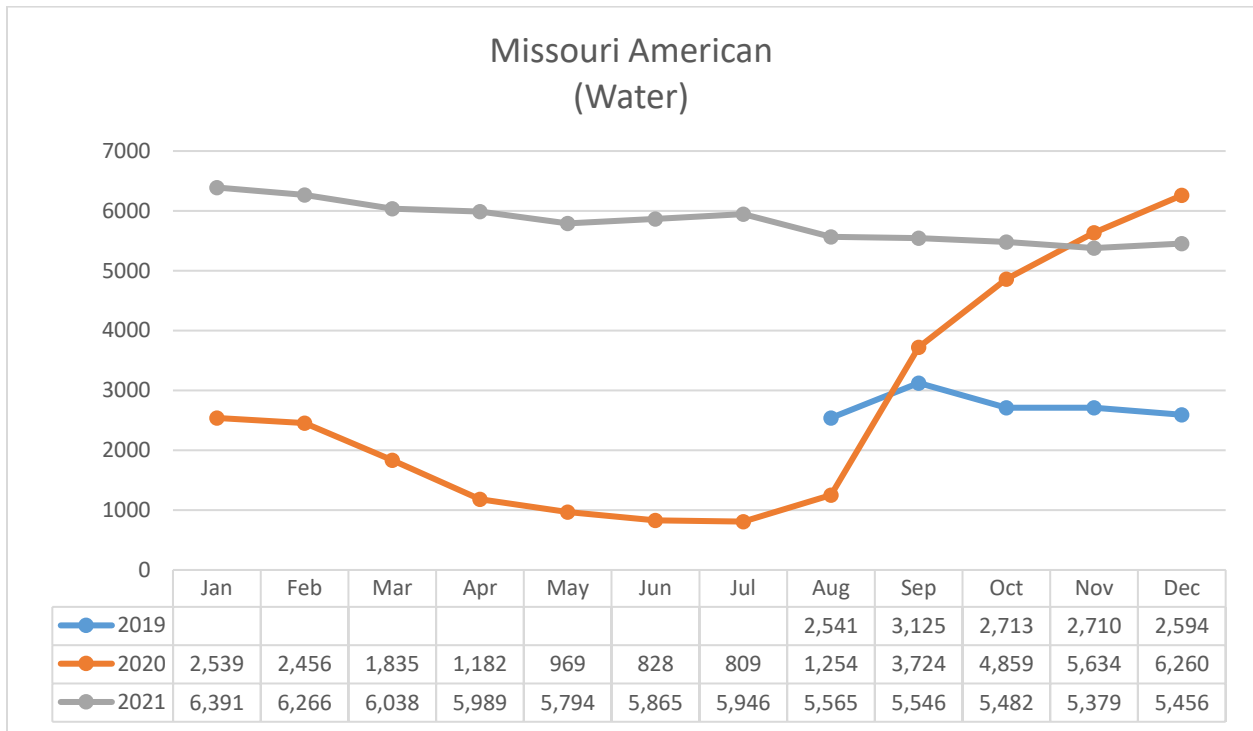
The previous data indicates that there were about 4% more Missouri-American customers with past-due accounts in December 2021 versus December 2020 and approximately 6% more in December 2021 than in November 2021. There were less than 1% fewer customers with past-due accounts in December 2021 versus pre-pandemic, December 2019. 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 3% fewer customers who were not disconnected in December 2021 versus December 2020 and approximately 17% fewer in December 2021 than in November 2021. There were 42% fewer customers who received a final disconnection notice, but have not been disconnected in December 2021 versus pre-pandemic, December 2019.

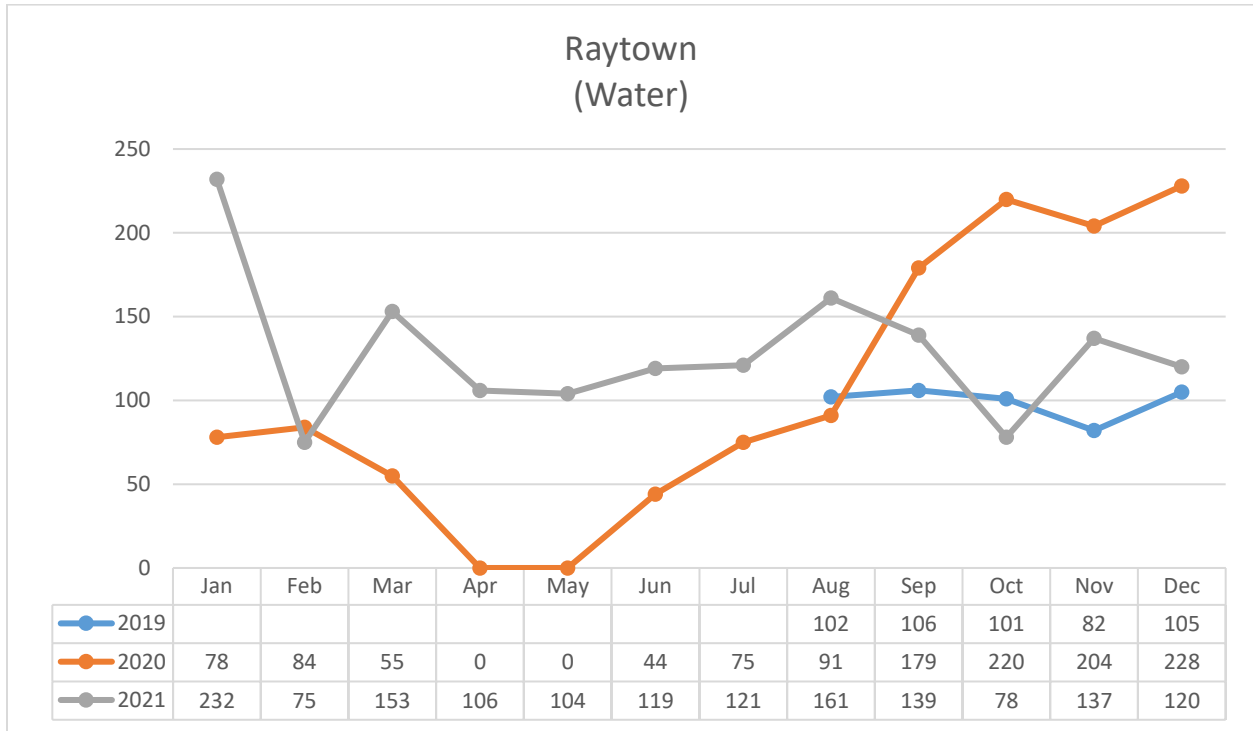
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 13% fewer Missouri-American customers who participated in payment plans in December 2021 versus December 2020 and 1% more in December 2021 than in November 2021. There were 110% more customers participating in payment plans in December 2021 versus pre-pandemic, December 2019.

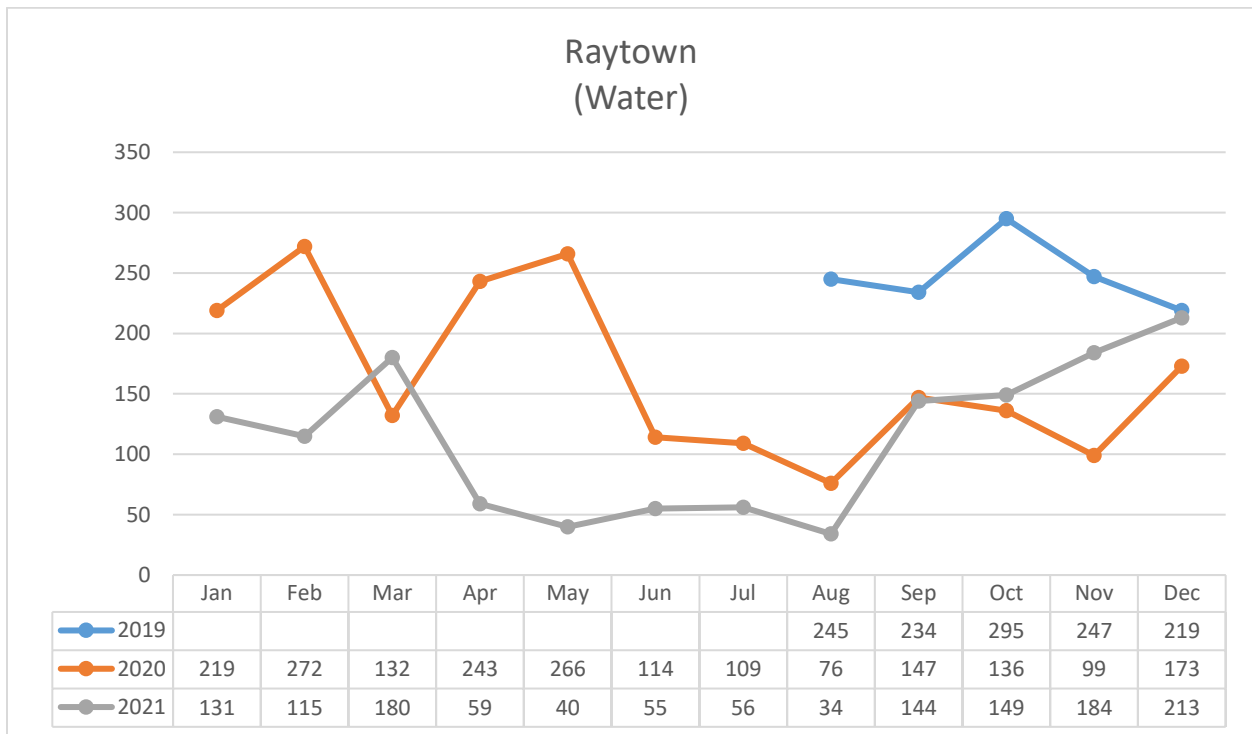
Questions 1 & 3 (Raytown Water)

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



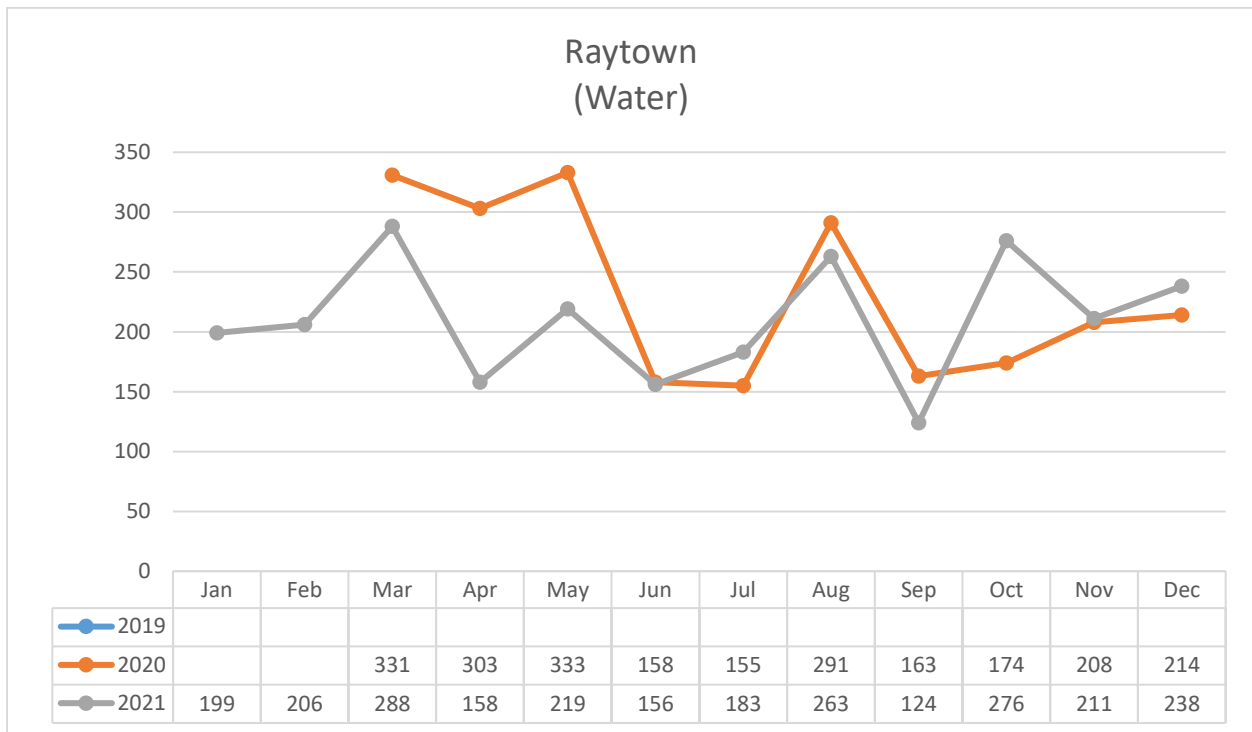
As shown in the previous graph, Raytown Water performed approximately 47% fewer disconnections for non-payment in December 2021 versus December 2020 and 12% fewer disconnections for non-payment in December 2021 versus November 2021. The number of actual disconnections by Raytown Water in December 2021 was approximately 9% below the number projected by Raytown Water for the same month. There were 14% more disconnections in December 2021 versus pre-pandemic, December 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”



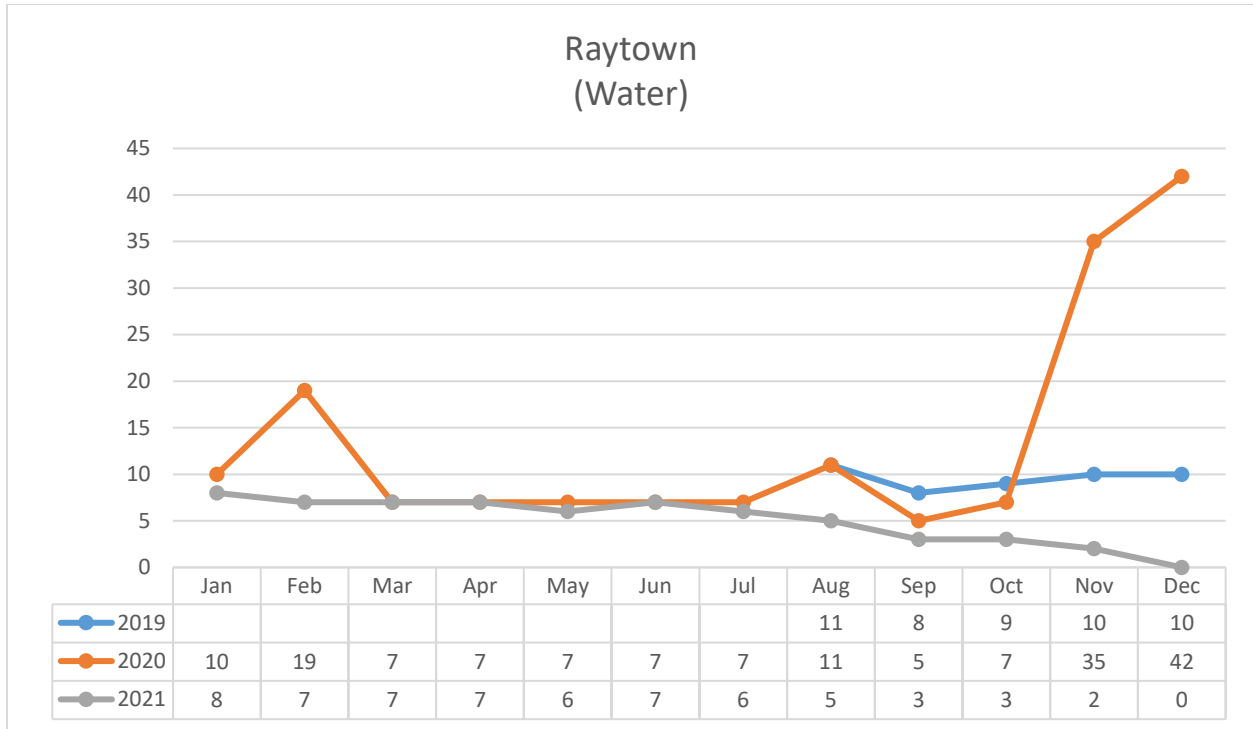
The previous data indicates that there were about 23% more Raytown Water customers with past-due accounts in December 2021 versus December 2020 and approximately 16% more in December 2021 than in November 2021. There were 6 fewer customers with past due accounts in December 2021 versus pre-pandemic, December 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



As shown by Raytown Water’s data, for those customers who received a final disconnection notice there were approximately 11% more customers who were not disconnected in December 2021 versus December 2020 and approximately 13% more in December 2021 than in November 2021. Staff is unable to compare December 2021 data to pre-pandemic data as Raytown Water was unable to provide historical data for December 2019.

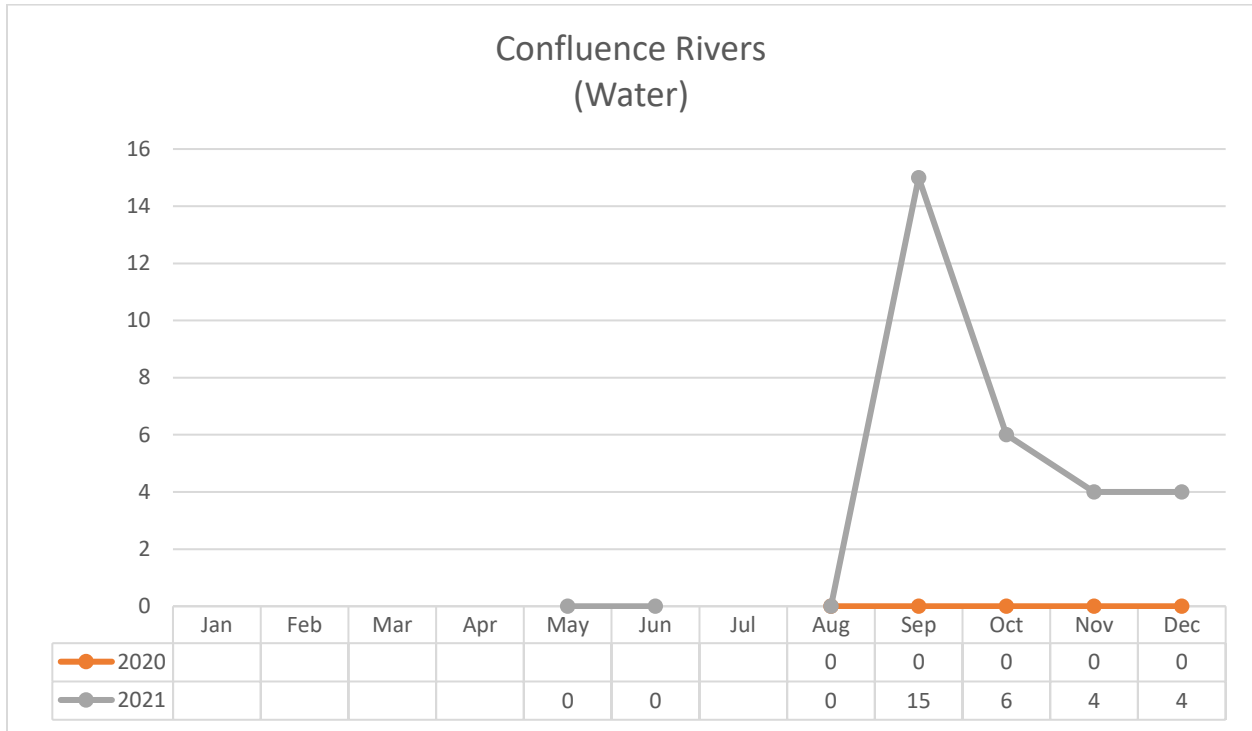
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were 0 customers of Raytown Water who participated in payment plans in December 2021 versus 42 in December 2020. There were 0 customers participating in a payment plan in December 2021 in comparison to 2 in November 2021. There were 0 customers participating in payment plans in December 2021 versus 10 pre-pandemic, December 2019.

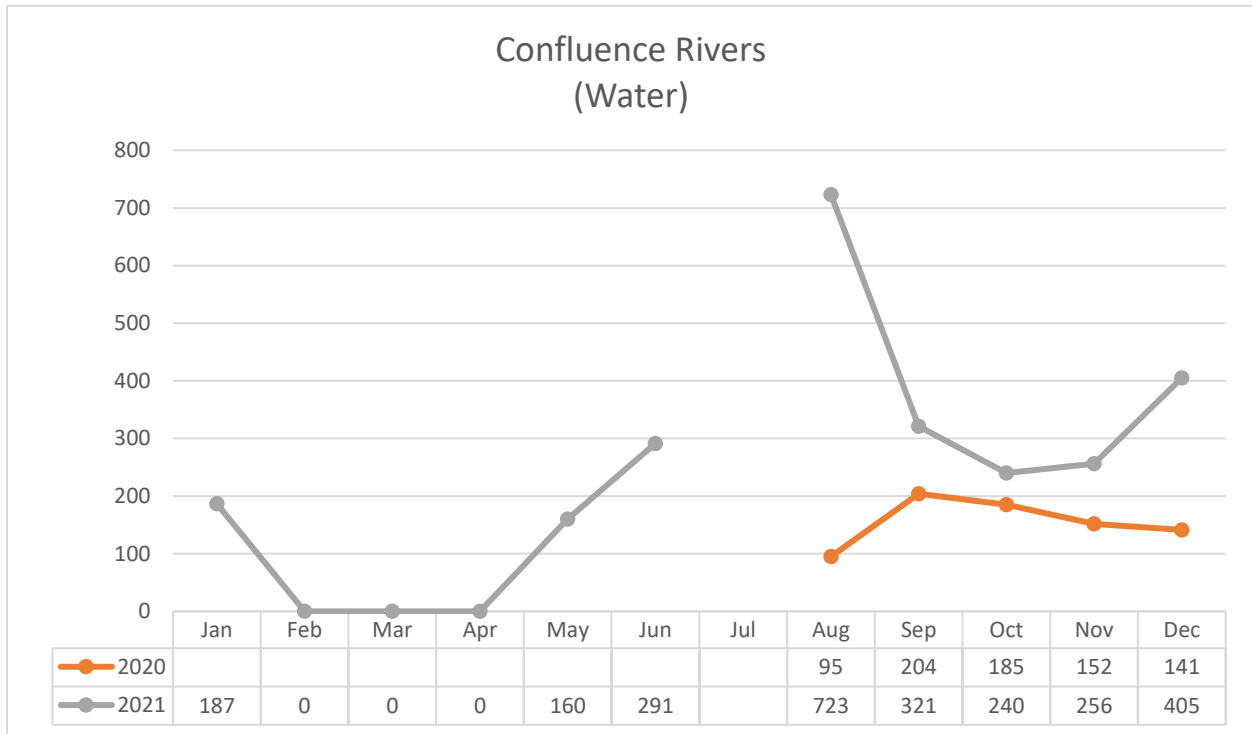
Questions 1 & 3 (Confluence Rivers - Water)

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



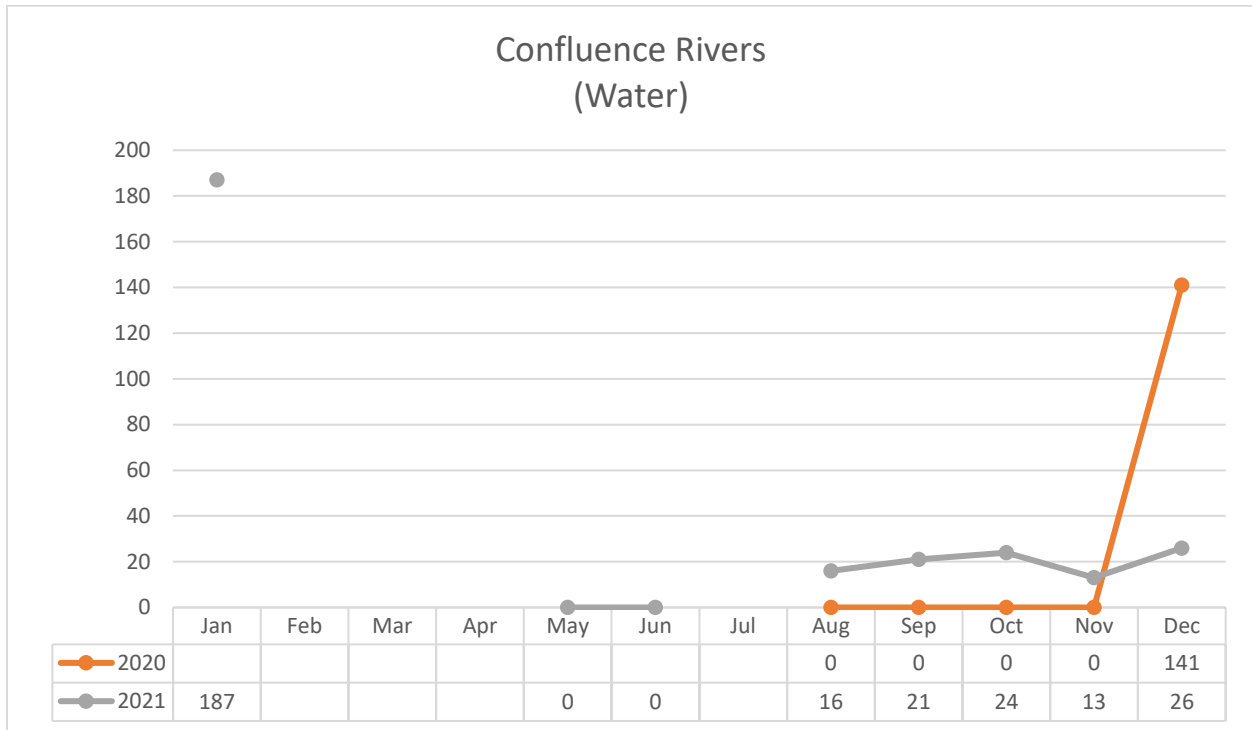
As shown in the previous graph, Confluence Rivers performed 4 disconnections in December 2021 and none in December 2020. There were 4 disconnections in both December 2021 and November 2021. A total of 24 disconnections were performed from August 2019 through February 2020 but that total was not broken down by month. Confluence Rivers completed 73% fewer disconnections than their forecasted number for December 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”



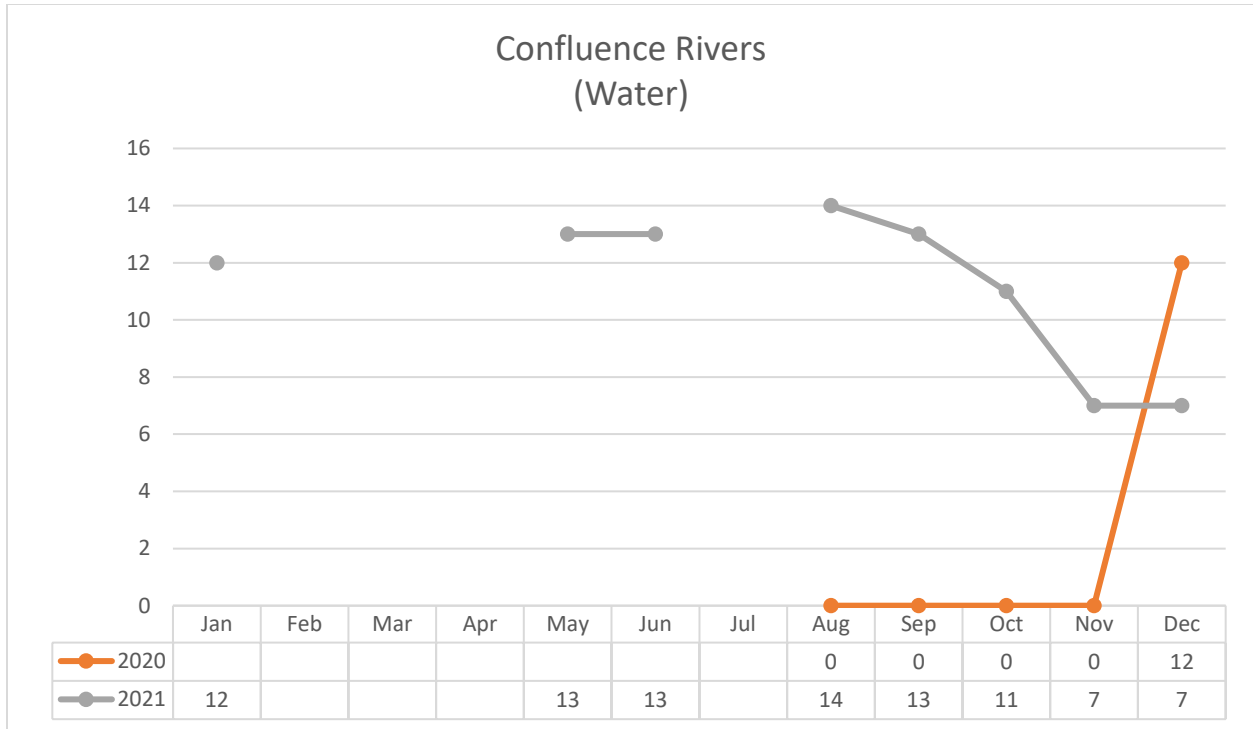
The previous data indicates there were approximately 187% more Confluence Rivers’ customers with past-due accounts in December 2021 versus December 2020 and approximately 58% more in December 2021 than in November 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there was a total of 37 customers with “past-due” accounts through February 2020. 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, there were 82% fewer customers who received a final disconnection notice but were not disconnected for non-payment of service in December 2021 compared to December 2020. There were 100% more customers who received a final notice in December 2021 than in November 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there were a total of 13 customers who received final disconnection notices but were not disconnected through February 2020.

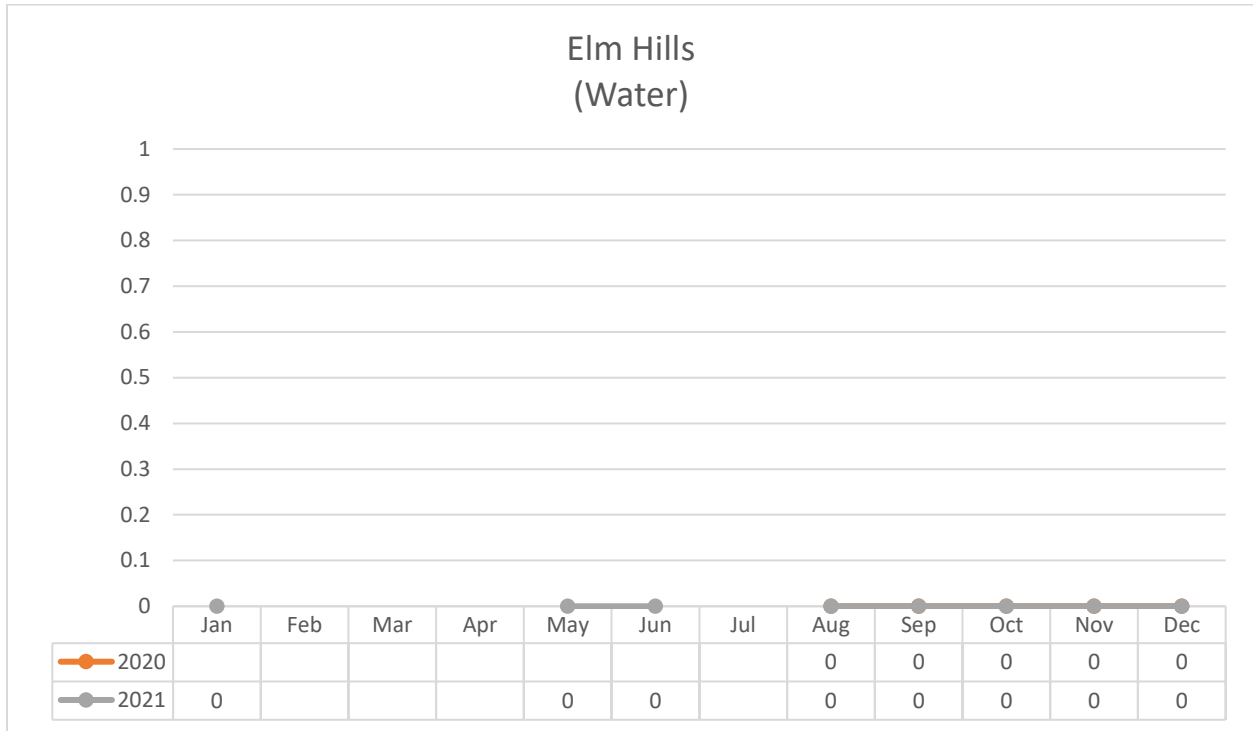
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were 7 Confluence Rivers’ customers who participated in payment plans in December 2021 versus 12 in December 2020. There were 7 customers participating in a payment plan in both December 2021 and November 2021. No monthly, comparative data was provided for August 2019 to July 2020, although the Company reported there were no customers who participated in payment plans through February 2020.

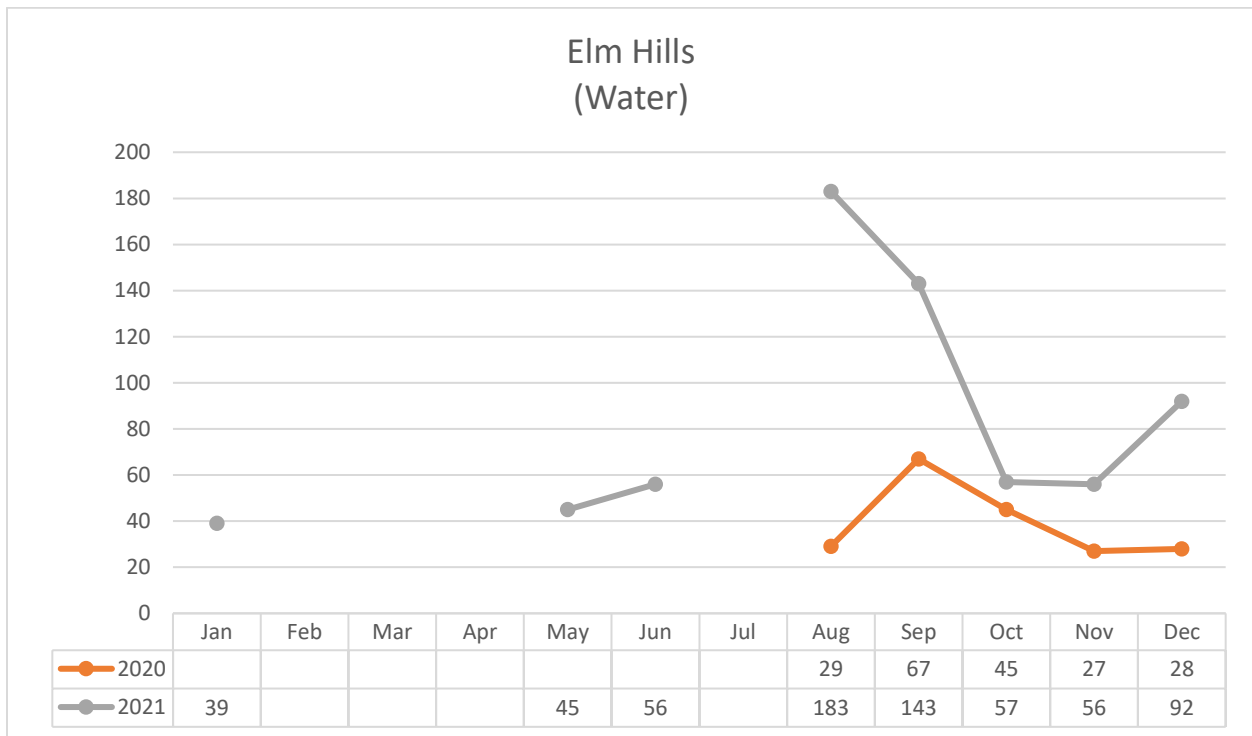
Questions 1 & 3 (Elm Hills - Water)

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



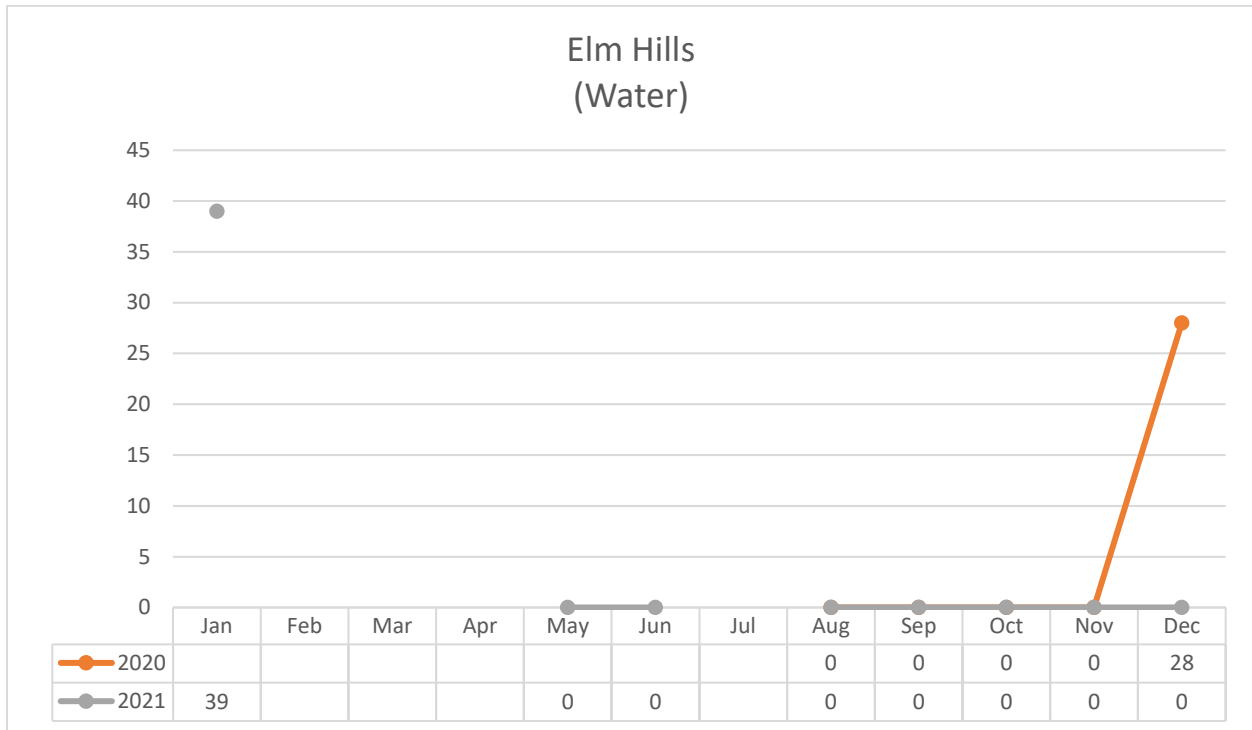
As shown in the previous graph, Elm Hills performed no disconnections in December 2021 or in December 2020. There were no disconnections for comparison in December 2021 or November 2021. There was no data was provided for August 2019 to July 2020, as no disconnections were performed during this time period. Elm Hills forecasted there would be 4 disconnections in December 2021, none were performed.

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



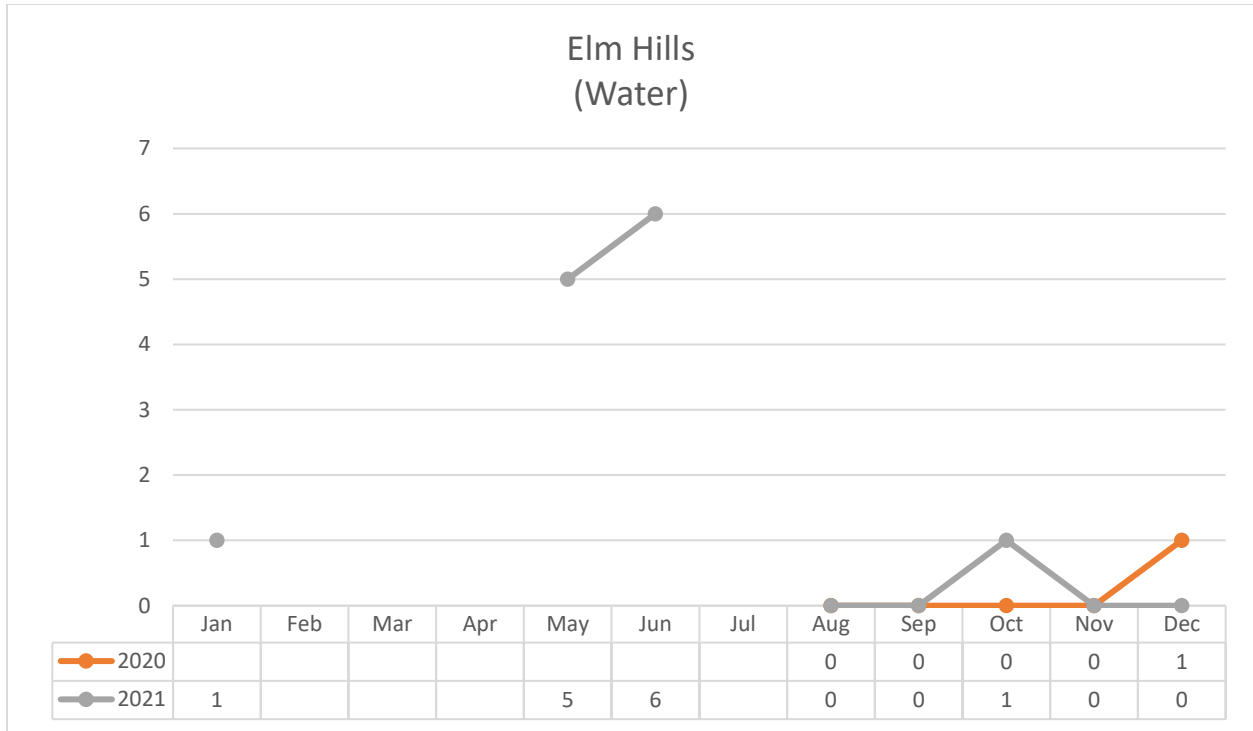
The previous data indicates there were about 229% more Elm Hills customers with past-due accounts in December 2021 versus December 2020 and 64% more in December 2021 compared to November 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there was a total of 1 customer with a “past-due” account through February 2020. 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, there were no customers who received a final disconnection notice but were not disconnected for non-payment of service in December 2021 versus 28 in December 2020. There were no customers who received a final disconnection but were not disconnected in comparison for December 2021, or for November 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there was a total of 1 customer who received final disconnection notices but was not disconnected through February 2020.

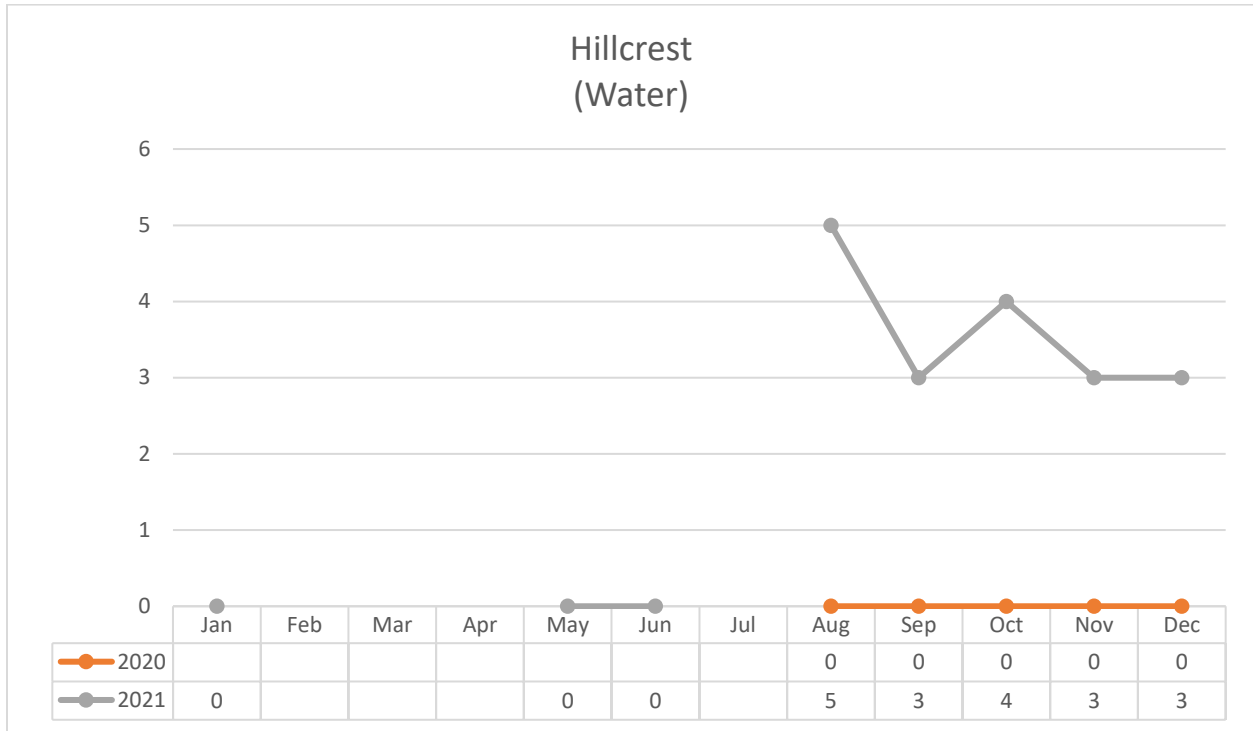
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were no Elm Hills customers who participated in a payment plan in December 2021 versus one in December 2020. There were no customers who participated in a payment plans in December 2021, or November 2021. No monthly, comparative data was provided for August 2019 to July 2020.

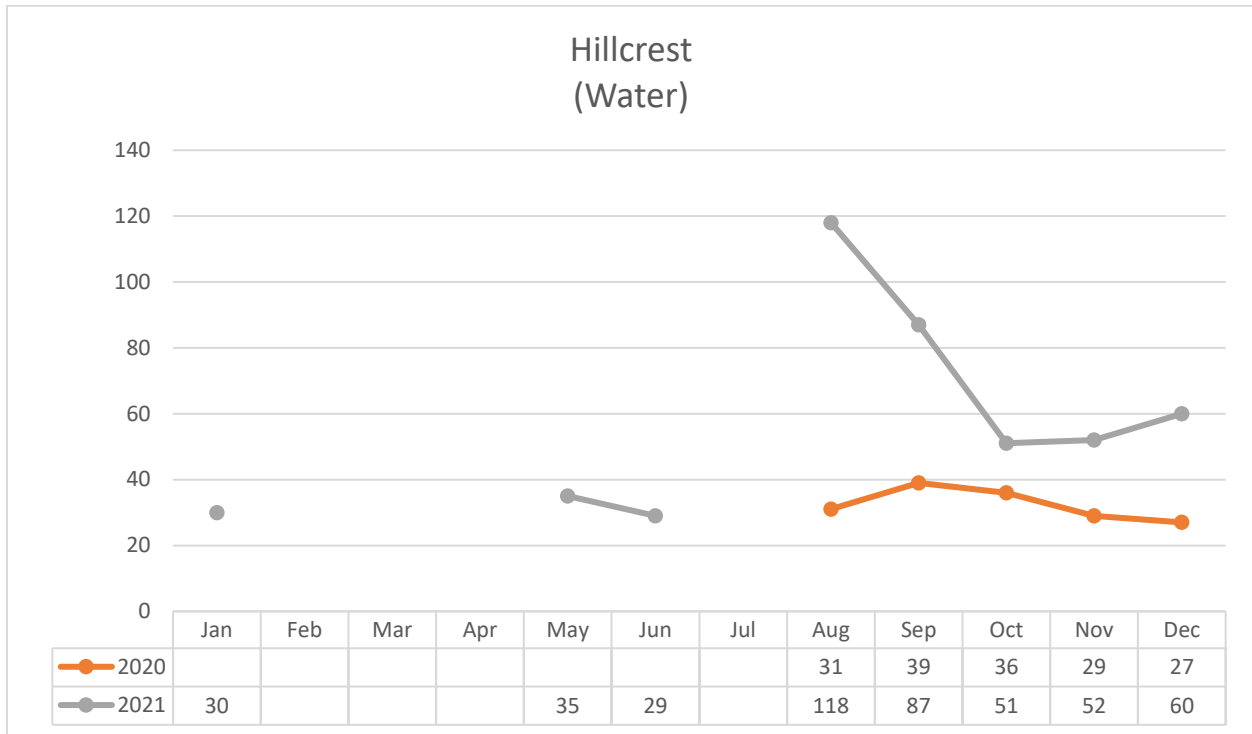
Questions 1 & 3 (Hillcrest - Water)

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



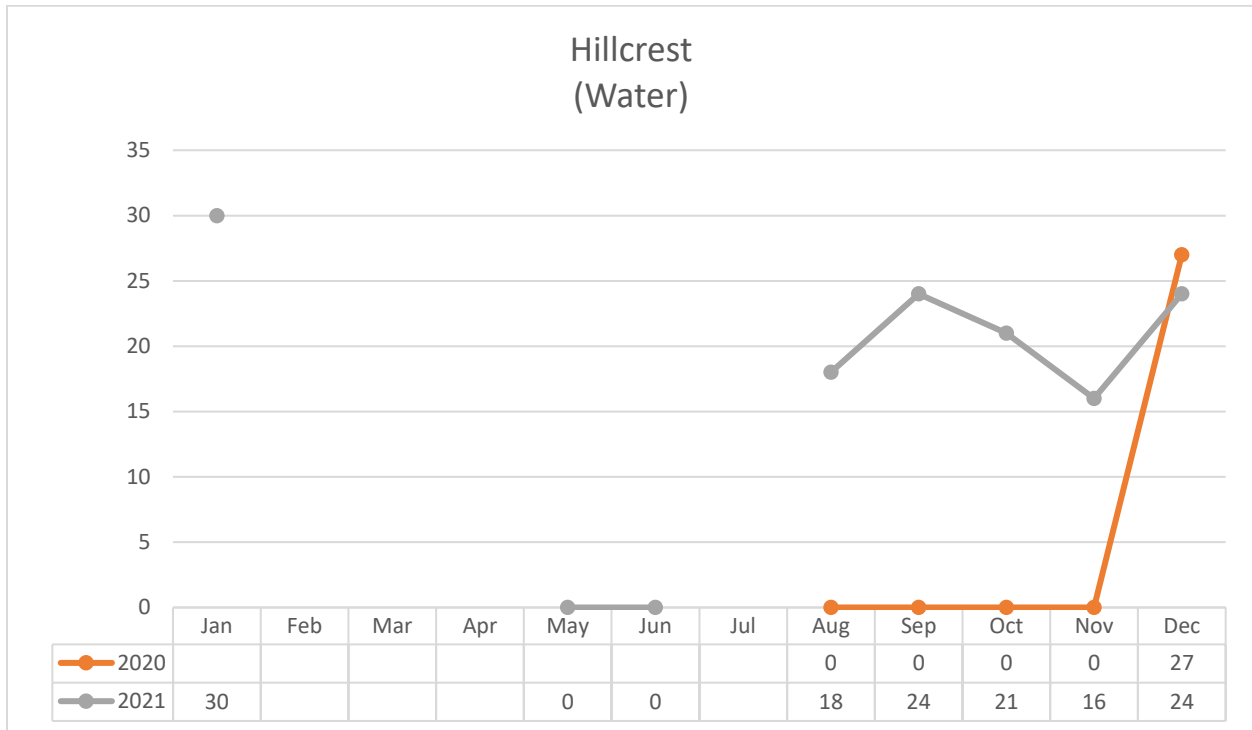
As shown in the previous graph, Hillcrest performed 3 disconnections in December 2021 versus none in December 2020. There were 3 disconnections performed in December 2021 and the same for November 2021. Hillcrest forecasted 3 disconnections for December 2021, and performed 3. No monthly, comparative data was provided for August 2019 to July 2020, although a total of 12 disconnections were performed through February 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”



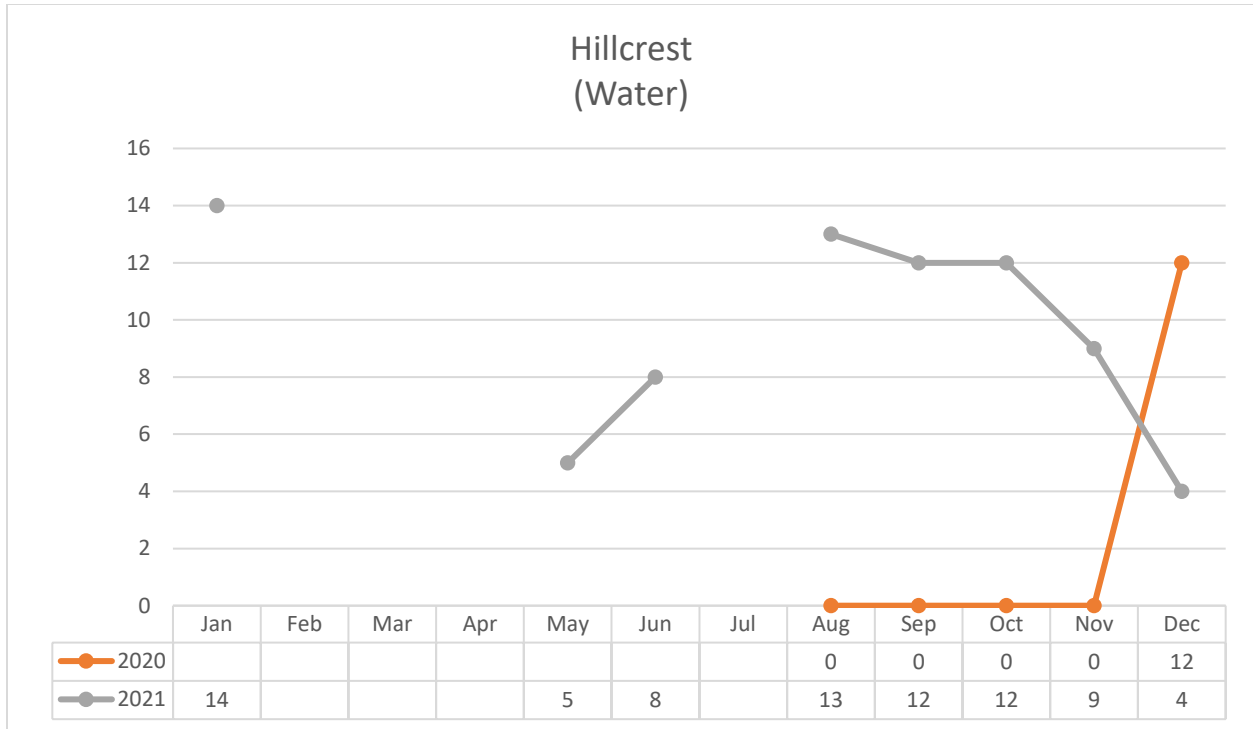
The previous data indicates there were about 122% more Hillcrest customers with past-due accounts in December 2021 versus December 2020 and 8 more customers with past-due accounts in December 2021 versus November 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there was a total of 16 customers with “past-due” accounts through February 2020. 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, there were 24 customers who received a final disconnection notice in December 2021 versus 27 in December 2020. There were 8 more customers who received a final notice but have not been disconnected in December 2021 than in November 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there were a total of 4 customers through February 2020 who received final disconnection notices during this time period but were not disconnected.

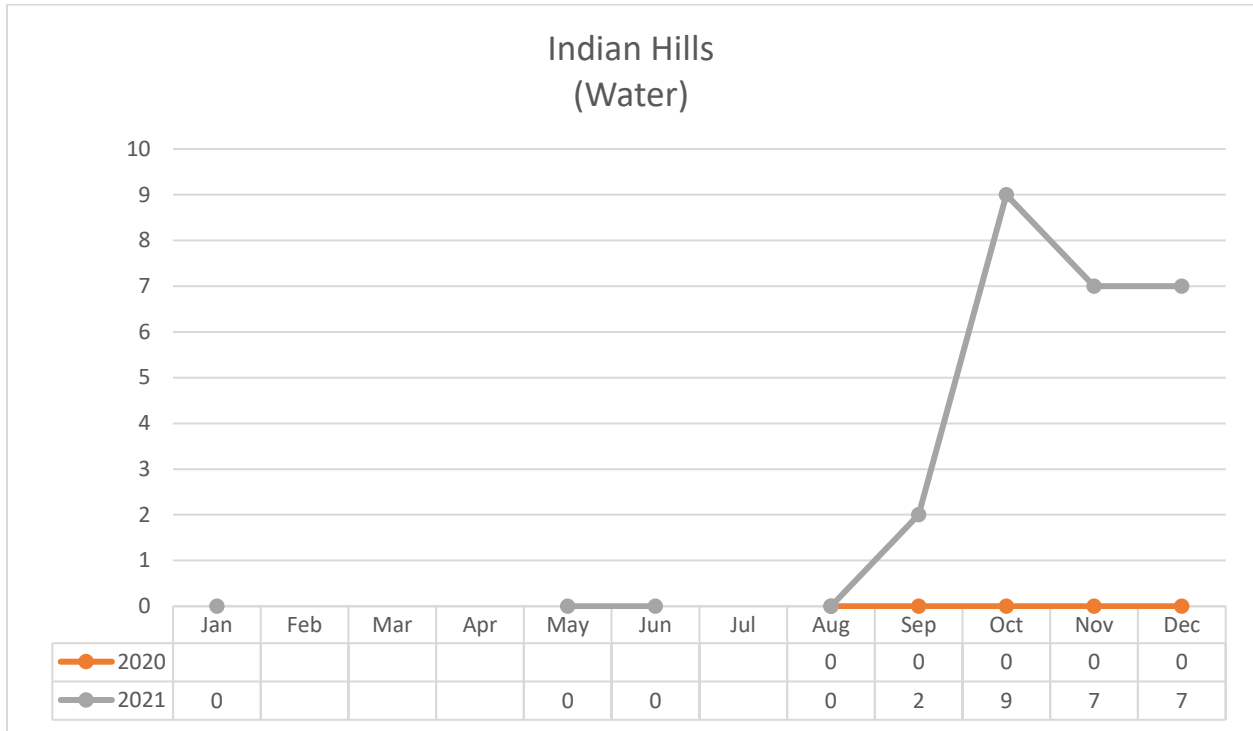
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were 4 Hillcrest customers who participated in payment plans in December 2021 versus 12 in December 2020. There were 5 less customers that participated in a plan in December 2021 versus November 2021. No monthly, comparative data was provided for August 2019 to July 2020, although the Company reported there were no customers who participated in payment plans through February 2020.

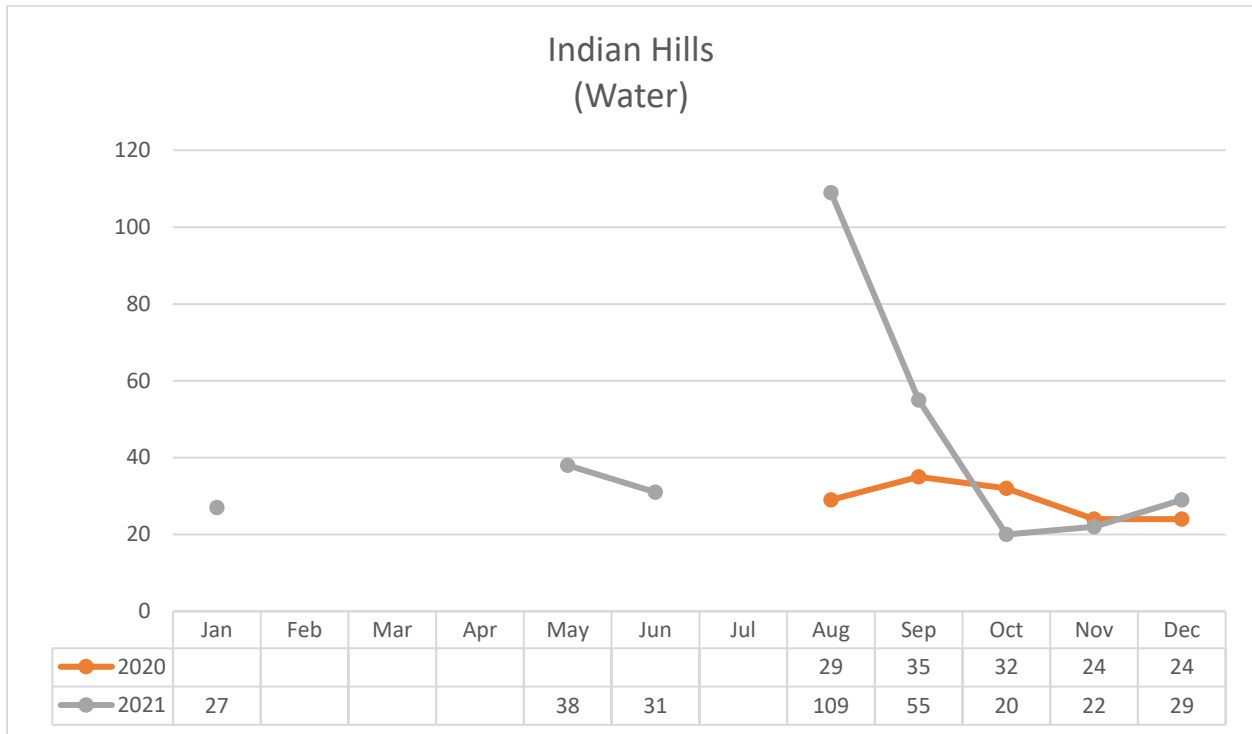
Questions 1 & 3 (Indian Hills - Water)

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



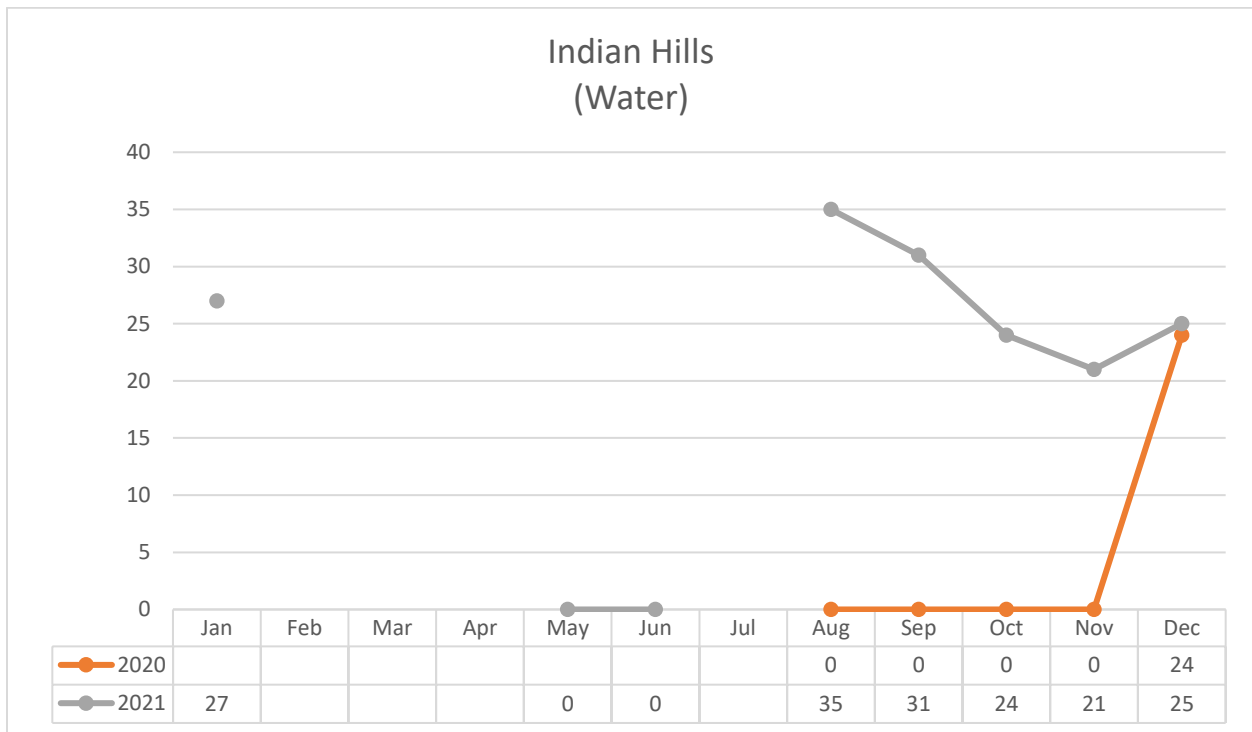
As shown in the previous graph, Indian Hills performed 7 disconnections in December 2021 versus none in December 2020. There were 7 disconnections in December 2021 and the same for November 2021. Indian Hills projected 2 disconnections in December 2021 and performed 7. No monthly, comparative data was provided for August 2019 to July 2020, although a total of 6 disconnections were performed through February 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”



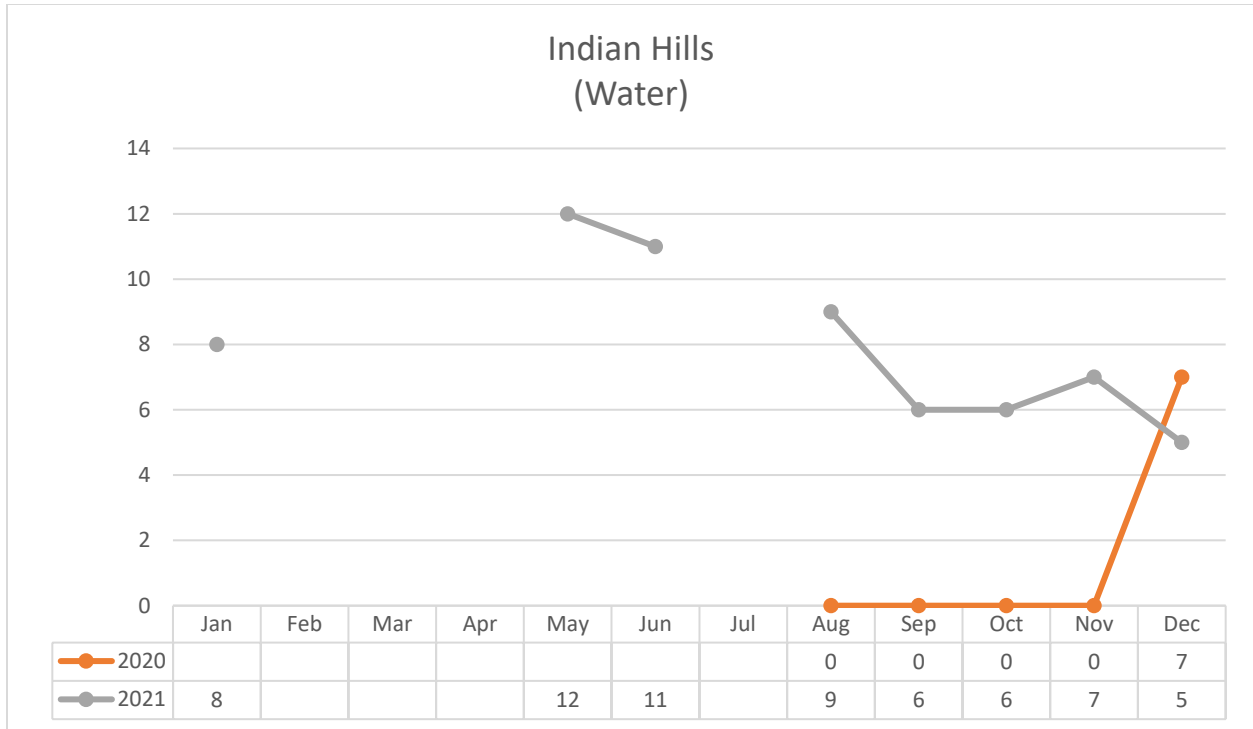
The previous data indicates there were 5 more Indian Hills customers with past-due accounts in December 2021 versus December 2020 and 7 more customers with past-due accounts in December 2021 versus November 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there was a total of 11 customers with “past-due” accounts through February 2020. 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, there were 25 customers who received a final disconnection notice in December 2021 versus 24 in December 2020 and 4 more customers who received a final disconnection notice in December 2021 versus November 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there were a total of 6 customers who received final disconnection notices through February 2020 but were not disconnected.

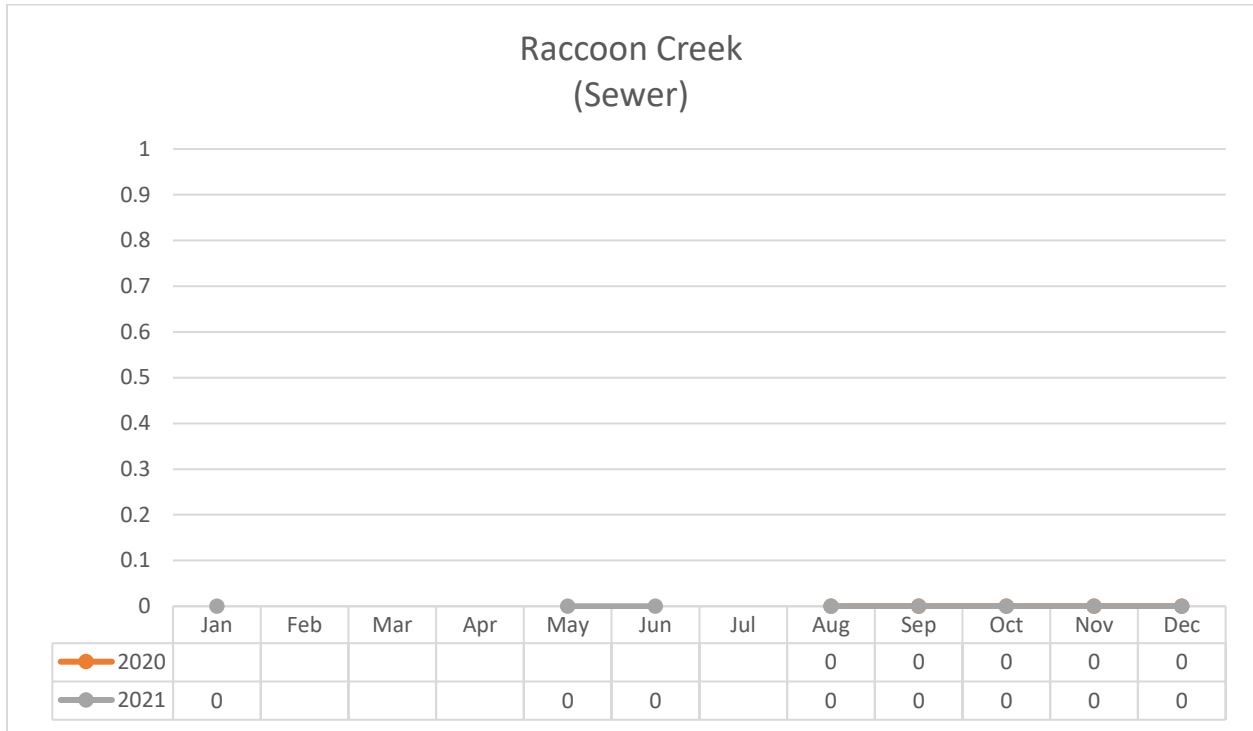
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were 5 Indian Hills customers who participated in payment plans in December 2021 versus 7 in December 2020 and 2 fewer customers who participated in payment plans in December 2021 versus November 2021. No monthly, comparative data was provided for August 2019 to July 2020, although the Company reported there was a total of 11 customers who participated in payment plans through February 2020.

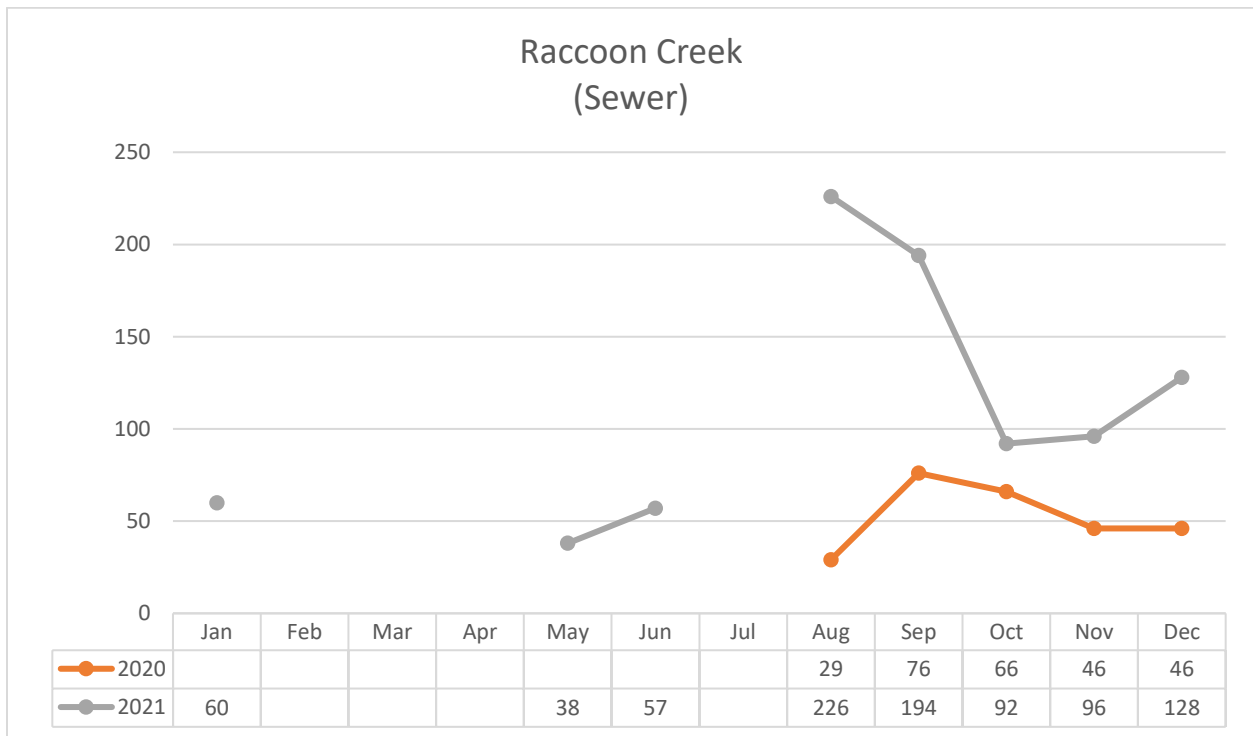
Questions 1 & 3 (Raccoon Creek - Sewer)

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



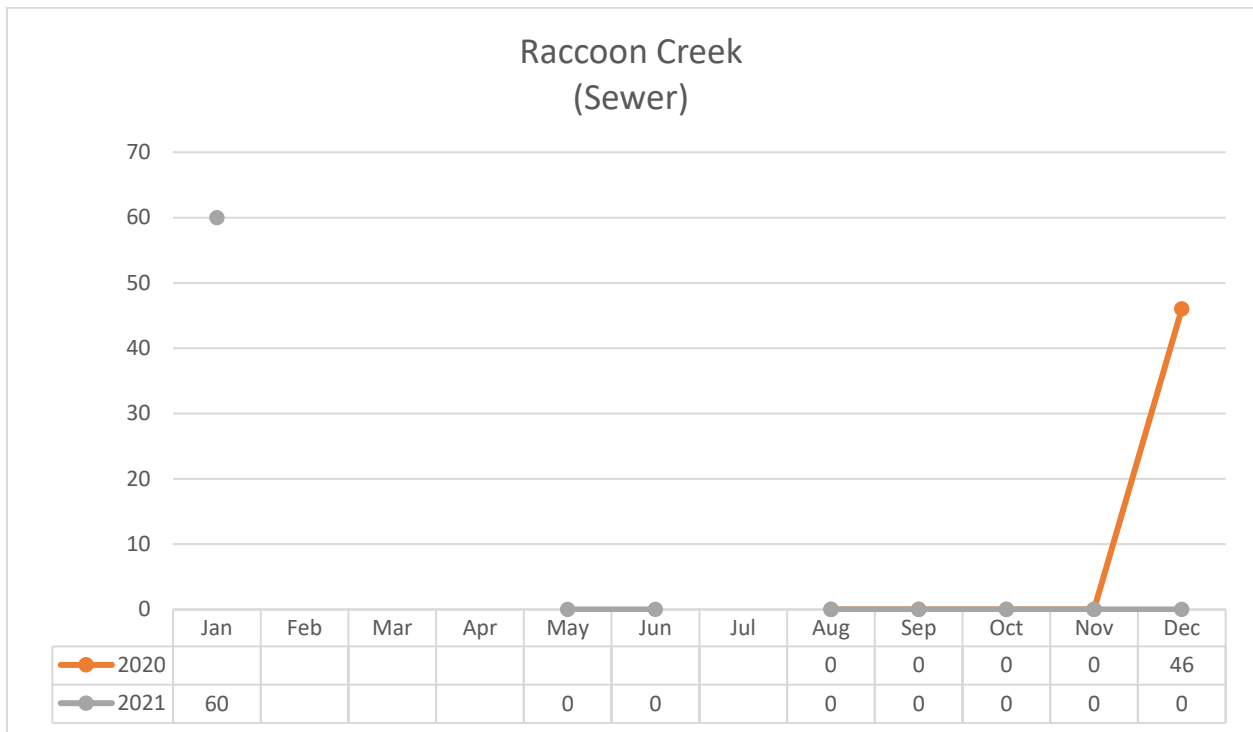
As shown in the previous graph, Raccoon Creek performed no disconnections in December 2021 or in December 2020 and no disconnections in December 2021 versus no disconnections in November 2021. Raccoon Creek forecasted 5 disconnections in December 2021 and performed none. No monthly, comparative data was provided for August 2019 to July 2020, although a total of 1 disconnection was performed through February 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”



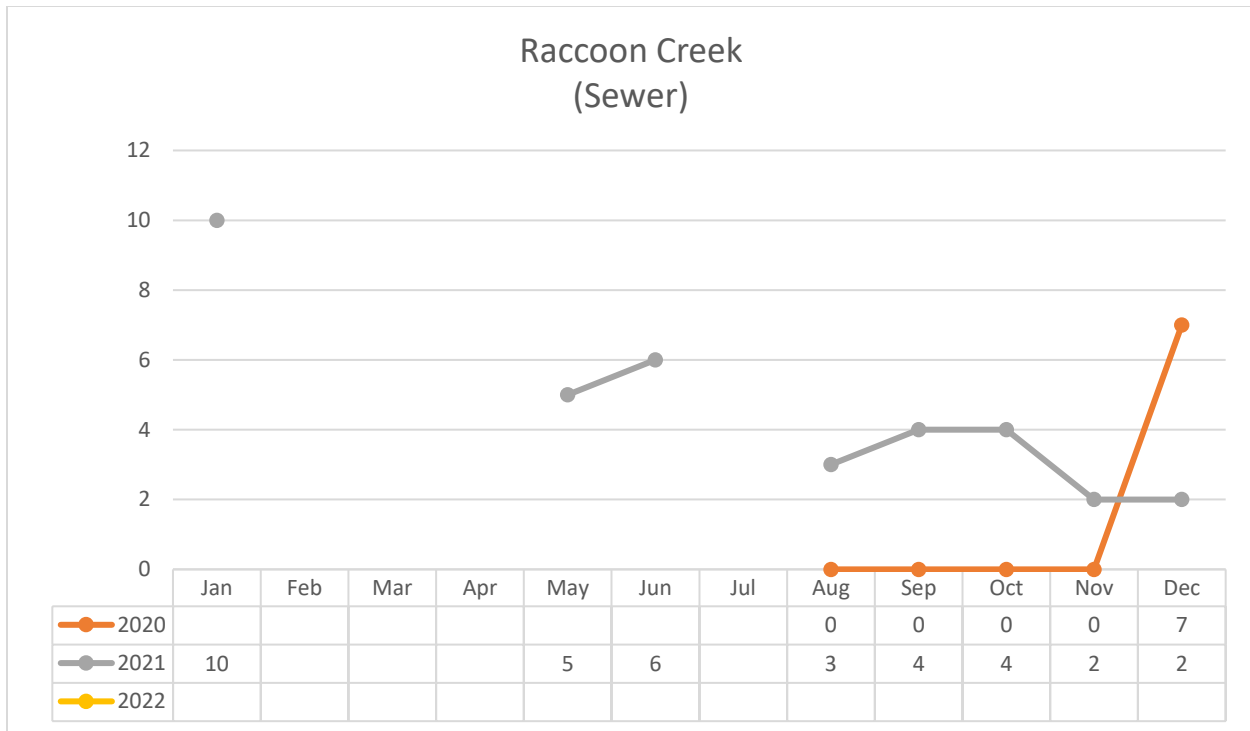
The previous data indicates there were about 178% more Raccoon Creek customers with past-due accounts in December 2021 versus December 2020 and 33% more customers with past-due accounts in December 2021 than November 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there were a total of 3 customers with “past-due” accounts through February 2020. Raccoon Creek reported that it defines “past-due” as any customer whose balance from the previous month remains unpaid with a minimum threshold of \$25.00 due.

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



As shown by Raccoon Creek’s data, there were no customers who received a final disconnection notice in December 2021 versus 46 in December 2020. There were none in December 2021 or November 2021. No monthly, comparative data was provided for August 2019 to July 2020, although there was a total of 2 customers who received final disconnection notices through February 2020 but were not disconnected.

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



The previous graph illustrates that there were 2 Raccoon Creek customers who participated in payment plans in December 2021 versus 7 in December 2020. There were 2 customers who participated in a payment plan in December 2021 and the same for November 2021. No monthly, comparative data was provided for August 2019 to July 2020, although the Company reported there were no customers who participated in payment plans through February 2020.

Question 2

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

Ameren Missouri (Electric)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
9,000	10,000	6,000	2,000	2,000	3,000

Ameren Missouri (Electric) stated that its projections are determined by taking an average of the past three years’ monthly disconnections.

Empire (Electric)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
490	600	250	35	15	35

Empire (Electric) projections are based off of the 2020-2021 disconnect data, with the assumption that the upcoming winter weather will be similar. Several factors prevent the Company from processing disconnects in the winter months (November – February). These factors include temperatures and the holidays which occur in November and December. Also, during this time period many customers participate in the Cold Weather Agreement (CWA) to prevent being disconnected for non-pay.

Evergy Metro (Electric)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
1850	1480	370	100	100	100

Evergy Metro responded that its estimates are based on recent and previous year data and resource capacity. November assumes reduced days eligible to cut for residential due to weather. December through February assumes commercial only due to likely Cold Weather Rule restrictions.

Evergy West (Electric)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
1250	1000	250	60	60	60

Evergy West responded that its estimates are based on recent and previous year data and resource capacity. November assumes reduced days eligible to cut for residential due to weather. December through February assumes commercial only due to likely Cold Weather Rule restrictions.

Ameren Missouri (Gas)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
170	200	35	25	20	40

Ameren Missouri (Gas) stated that its projections are determined by taking an average of the past three years' monthly disconnections.

Spire (Gas)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
4364	4138	1091	963	959	1949

Spire based its estimates on the average number of disconnects from 2017 to 2019 due to the COVID-19 related disconnection moratoriums in 2020.

Summit (Gas)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
116	29	17	13	27	59

Summit projections were determined by taking the sum of non-payment disconnections for 2018, 2019 and 2020 then dividing by 3 to get an average.

Empire (Gas)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
400	150	35	0	0	5

Empire (Gas) projections are based off of the 2020-2021 disconnect data, with the assumption that the upcoming winter weather will be similar. Several factors prevent the Company from processing disconnects in the winter months (November – February). These factors include temperatures and the holidays which occur in November and December. Also, during this time period many customers participate in the Cold Weather Agreement (CWA) to prevent being disconnected for non-pay.

Liberty (MNG) (Gas)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
400	250	150	100	75	75

Liberty MNG projections are based off of the 2020-2021 disconnect data, with the assumption that the upcoming winter weather will be similar. Several factors prevent the Company from processing disconnects in the winter months (November – February). These factors include temperatures and the holidays which occur in November and December. Also, during this time period many customers participate in the Cold Weather Agreement (CWA) to prevent being disconnected for non-pay.

Liberty (Water)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
25	30	25	10	0	0

Liberty Water based its projections off of the 2020-2021 disconnect data, with the assumption that the upcoming winter weather will be similar.

Missouri-American (Water)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022

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

Raytown Water

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022

As of the date of filing, Raytown Water has not provided updated data to project an estimated number of disconnections for non-payment of service for the six-month period of September 2021 through February 2022.

Confluence Rivers (Water)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
15	15	15	15	15	15

CSWR, LLC's Missouri entities have limited recent data to use for estimating future shut-offs. This is due in part to the moratorium on service disconnections during the pandemic and also the fact that many of the Company's customer connections were acquired over the last year, coinciding with pandemic restrictions. As shut-off procedures again become a regular part of CSWR's response to delinquencies, the Company expects that the percentage of customers eligible for shut-off procedures will go down. Based on Confluence Rivers' allocation of past-due accounts, CSWR, LLC expects to shut off approximately 15 customers per month for the 6 month period.

Elm Hills (Water)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
4	4	4	4	4	4

CSWR, LLC's Missouri entities have limited recent data to use for estimating future shut-offs. This is due in part to the moratorium on service disconnections during the pandemic and also the fact that many of the Company's customer connections were acquired over the last year, coinciding with pandemic restrictions. As shut-off procedures again become a regular part of CSWR's response to delinquencies, the Company expects that the percentage of customers eligible for shut-off procedures will go down. Based on Elm Hills' allocation of past-due accounts, CSWR, LLC expects to shut off approximately 4 customers per month for the 6 month period.

Hillcrest (Water)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
3	3	3	3	3	3

CSWR, LLC's Missouri entities have limited recent data to use for estimating future shut-offs. This is due in part to the moratorium on service disconnections during the pandemic and also

the fact that many of the Company's customer connections were acquired over the last year, coinciding with pandemic restrictions. As shut-off procedures again become a regular part of CSWR's response to delinquencies, the Company expects that the percentage of customers eligible for shut-off procedures will go down. Based on Hillcrest's allocation of past-due accounts, CSWR, LLC expects to shut off approximately 3 customers per month for the 6 month period.

Indian Hills (Water)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
2	2	2	2	2	2

CSWR, LLC's Missouri entities have limited recent data to use for estimating future shut-offs. This is due in part to the moratorium on service disconnections during the pandemic and also the fact that many of the Company's customer connections were acquired over the last year, coinciding with pandemic restrictions. As shut-off procedures again become a regular part of CSWR's response to delinquencies, the Company expects that the percentage of customers eligible for shut-off procedures will go down. Based on Indian Hills' allocation of past-due accounts, CSWR, LLC expects to shut off approximately 2 customers per month for the 6 month period.

Raccoon Creek (Sewer)

9/2021	10/2021	11/2021	12/2021	1/2022	2/2022
5	5	5	5	5	5

CSWR, LLC's Missouri entities have limited recent data to use for estimating future shut-offs. This is due in part to the moratorium on service disconnections during the pandemic and also the fact that many of the Company's customer connections were acquired over the last year, coinciding with pandemic restrictions. As shut-off procedures again become a regular part of CSWR's response to delinquencies, the Company expects that the percentage of customers eligible for shut-off procedures will go down. Based on Raccoon Creek's allocation of past-due accounts, CSWR, LLC expects to shut off approximately 5 customers per month for the 6 month period.