

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of a Working Case to Consider Best Practices for Recovery of Past-Due Utility Customer Payments After the Covid-19 Pandemic Emergency )  
 ) **File No. AW-2020-0356**  
 )

**STAFF REPORT ON UTILITY DATA REQUEST RESPONSES**

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

1. On August 19, 2020, the Commission issued its *Order Directing Staff to Gather Information about Utility Disconnections*. Staff was directed to gather information from the state’s utilities regarding current levels of disconnection for non-payment, anticipated levels of such disconnections by those utilities in the next six months, number of customers with past due accounts, number of customers that have received a final disconnection notice, and number of customers participating in payment plans.

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

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

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

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

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

7. 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.

8. Starting with next month's report, Staff will begin adding a baseline showing the monthly average values prior to the pandemic to show how much the current numbers deviate from the pre-pandemic norm, per the Commission's August 11, 2021 Order.

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

Respectfully Submitted,

**/s/ Travis J. Pringle**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to all parties and/or counsels of record on this 20<sup>th</sup> day of August, 2021.

**/s/ Travis J. Pringle**

# MISSOURI PUBLIC SERVICE COMMISSION

## STAFF REPORT



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

FILE NO. AW-2020-0356

August 20, 2021

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**FILE NO. AW-2020-0356**

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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 15<sup>th</sup> day of each following month.<sup>1</sup> This report represents the twelfth such update, incorporating information through the end of July 2021 when available.

In response to the Order,<sup>2</sup> 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

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

<sup>2</sup> 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.

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

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

The following utilities did not respond to the Staff data request with month-end July 2021 data: Confluence Rivers Utility Operating Company, Inc. ("Confluence Rivers - Water"), Elm Hills Utility Operating Company, Inc. ("Elm Hills - Water"), Hillcrest Utility Operating Company, Inc. ("Hillcrest - Water"), Indian Hills Utility Operating Company, Inc. ("Indian Hills - Water"), and Raccoon Creek Utility Operating Company, Inc. ("Raccoon Creek - Sewer"). All of the above listed utilities are part of the Central States Water Resources ("CSWR") family



of water and sewer utilities. Information for the CSWR utilities will be provided through month-end June 2021 in this report.

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

The information reported below for Questions 1 and 3 is presented for the period September 2019 through July 2020 (orange dots and line), and for the period of September 2020 through July 2021 (blue dots and line). As this report is updated in the future, the orange dots and line and the blue dots and line will extend through future months. This method of presentation will allow for a direct comparison of the reported information for each month from September 2020 to July 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 July 2021 compared to June 2021).

Starting with next month's report, in compliance with the Commission's Order in this case dated August 11, 2021, Staff will include an additional line in each utility's graphs for Questions 1 and 3 presenting pre-pandemic metric values to compare to the pandemic period totals for 2020 and 2021.

### **Summary of Responses to Questions 1 and 3**

Regarding Question 1a and 3a, almost all of the individual utilities reported decreases in the number of customer disconnections for July 2021 compared to the previous month, June 2021. Comparisons between July 2021 and July 2020 disconnection totals are not particularly meaningful as most of the utilities were not disconnecting any customers one year ago during the pandemic.

For Question 1b and 3b, more of the responding utilities reported increases in the number of past-due customer accounts in July 2021 compared to the amount from June 2021. Approximately an equal number of utilities reported increases and decreases in the number of past-due customers for July 2021 compared to July 2020.

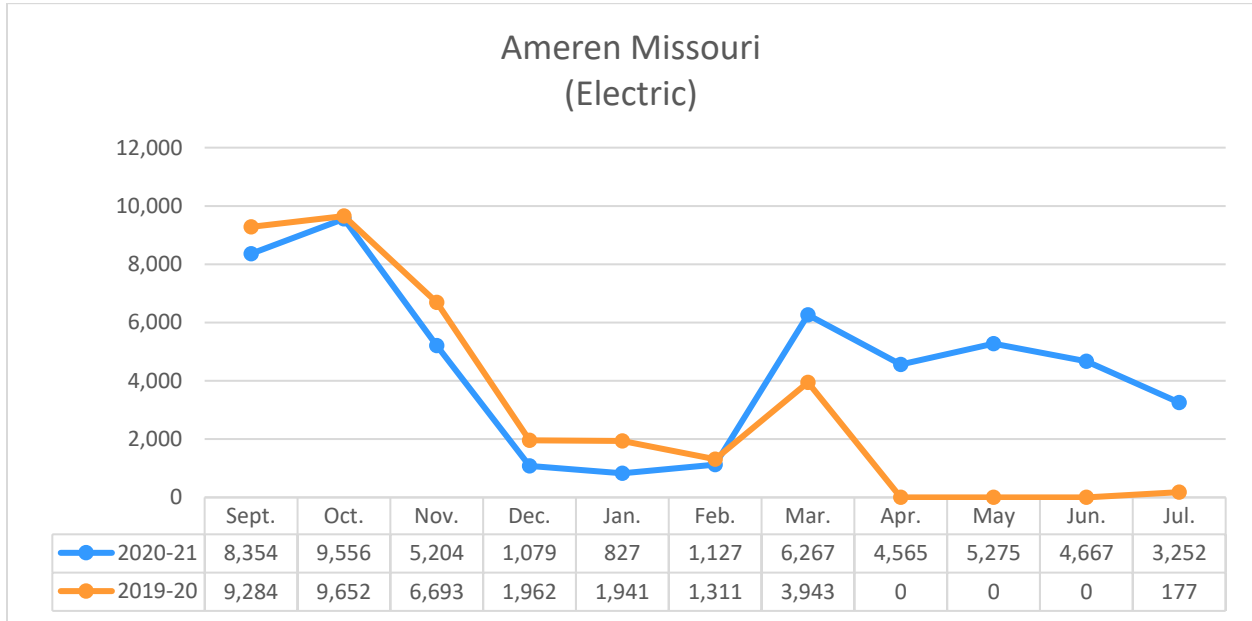
For Question 1c and 3c, in July 2021, about the same number of utilities reported increases or decreases in the number of customers who have received final disconnection notices, but have not yet been disconnected, compared to June 2021. Comparisons between July 2021 and July 2020 for this metric are not particularly meaningful as most utilities were not issuing final disconnection notices one year ago during the pandemic.

Regarding Question 1d and 3d, more utilities reported decreases than increases in the number of customers participating in payment plans in July 2021 compared to June 2021. More utilities reported increases than decreases in this metric for July 2021 compared to July 2020.

**Individual Utility Responses:**

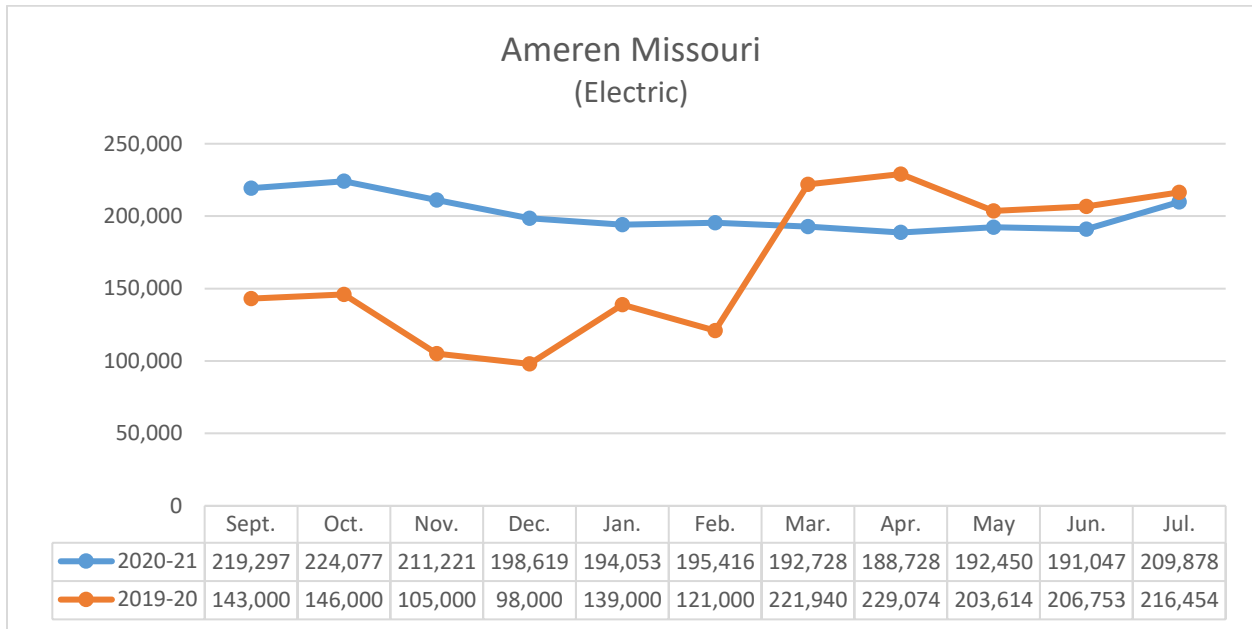
**Questions 1 & 3 (Ameren Missouri – Electric)**

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



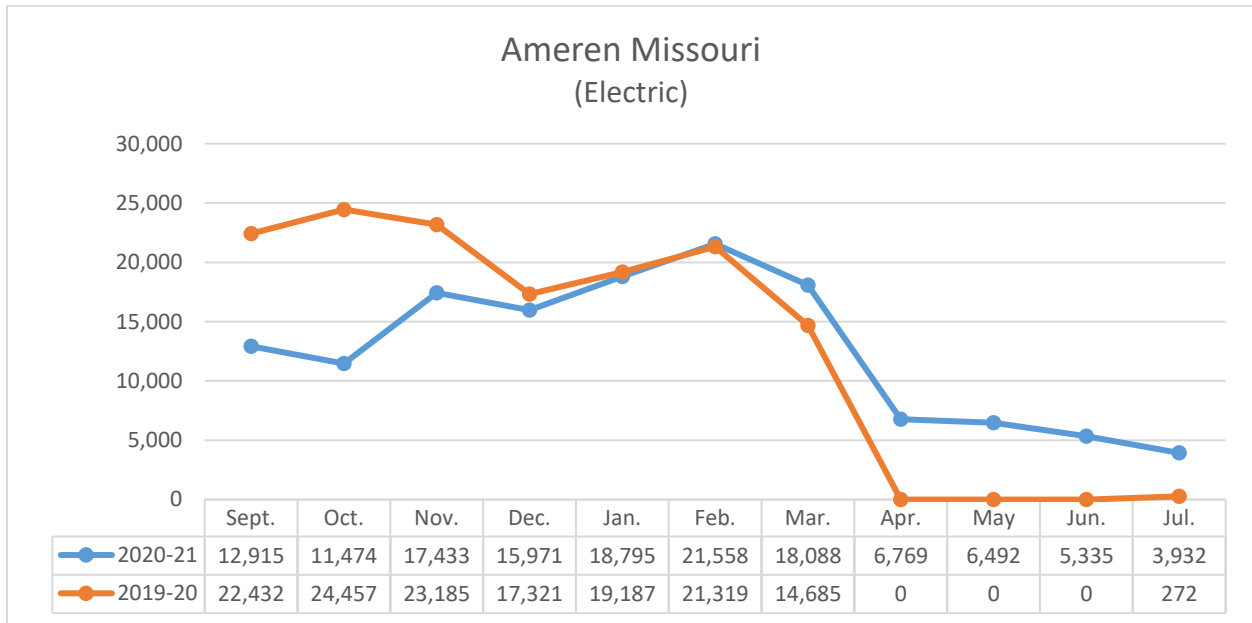
As shown in the previous graph, Ameren Missouri had 3,252 disconnections for non-payment in July 2021 versus 177 in July 2020 and about 30% fewer in July 2021 than in June 2021. The number of actual disconnections by Ameren Missouri in July 2021 was 43% below the amount projected by Ameren Missouri for the same month.

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



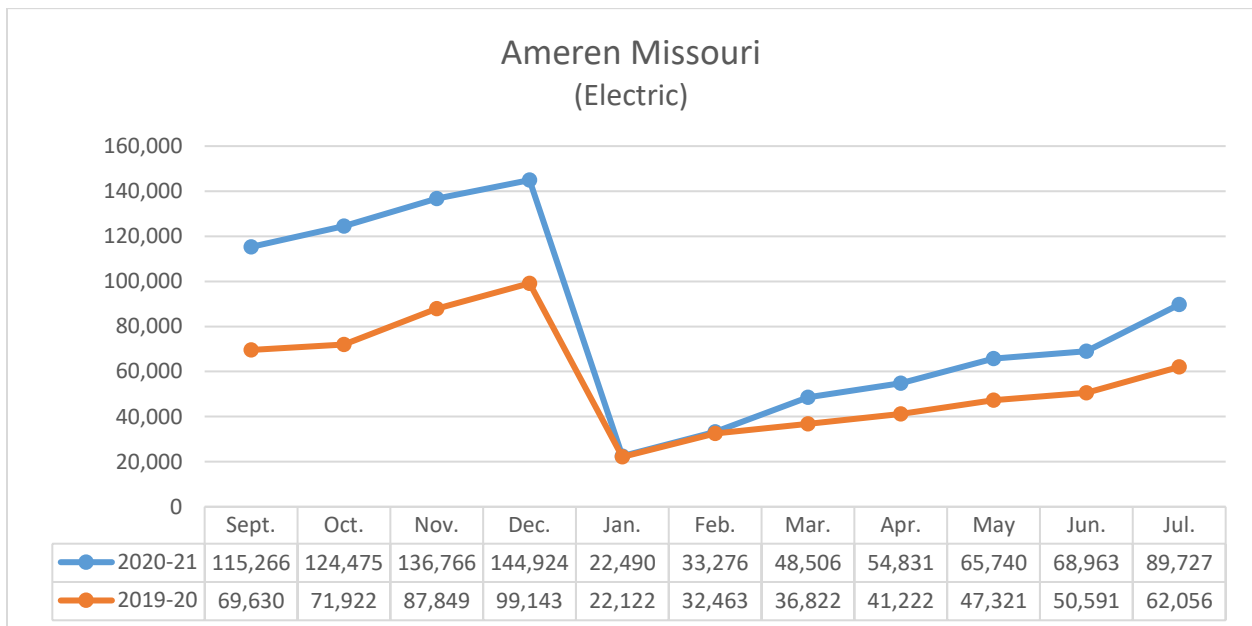
The previous data indicates that there were approximately 3% fewer Ameren Missouri customers with past-due accounts in July 2021 versus July 2020 and approximately 10% more in July 2021 than in June 2021. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

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



As shown by Ameren Missouri’s data, for those customers who received a final disconnection notice there were 3,932 customers who were not disconnected in July 2021 versus 272 in July 2020 and approximately 26% fewer in July 2021 than in June 2021.

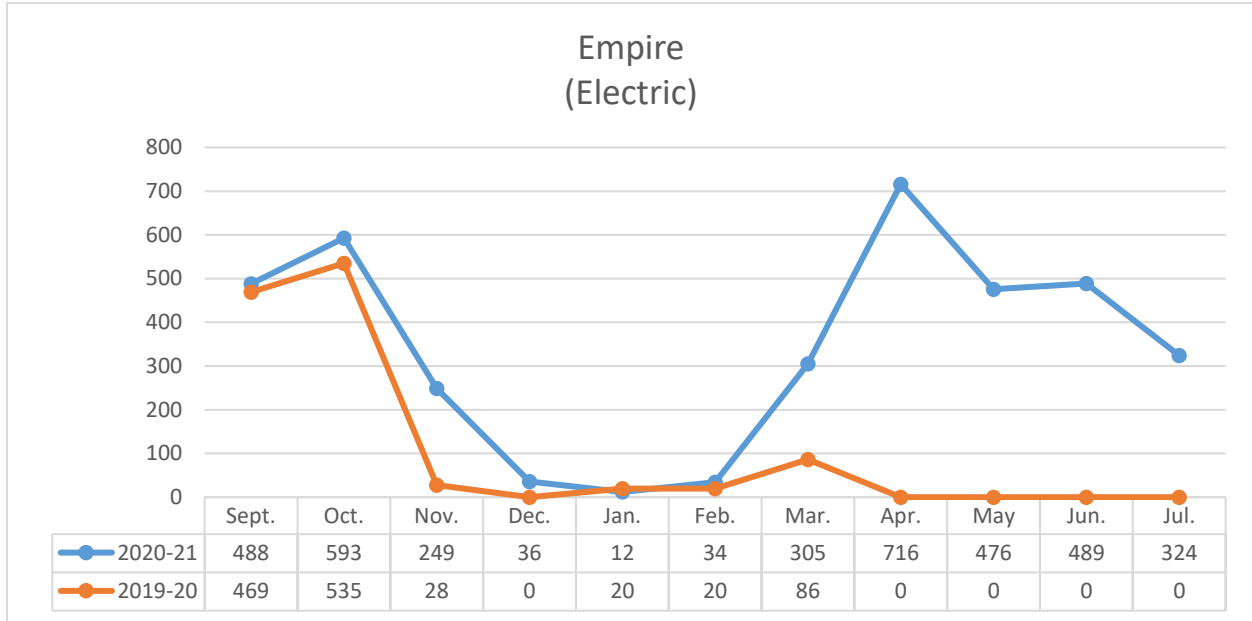
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 45% more Ameren Missouri customers who participated in payment plans in July 2021 versus July 2020 and about 30% more in July 2021 than in June 2021.

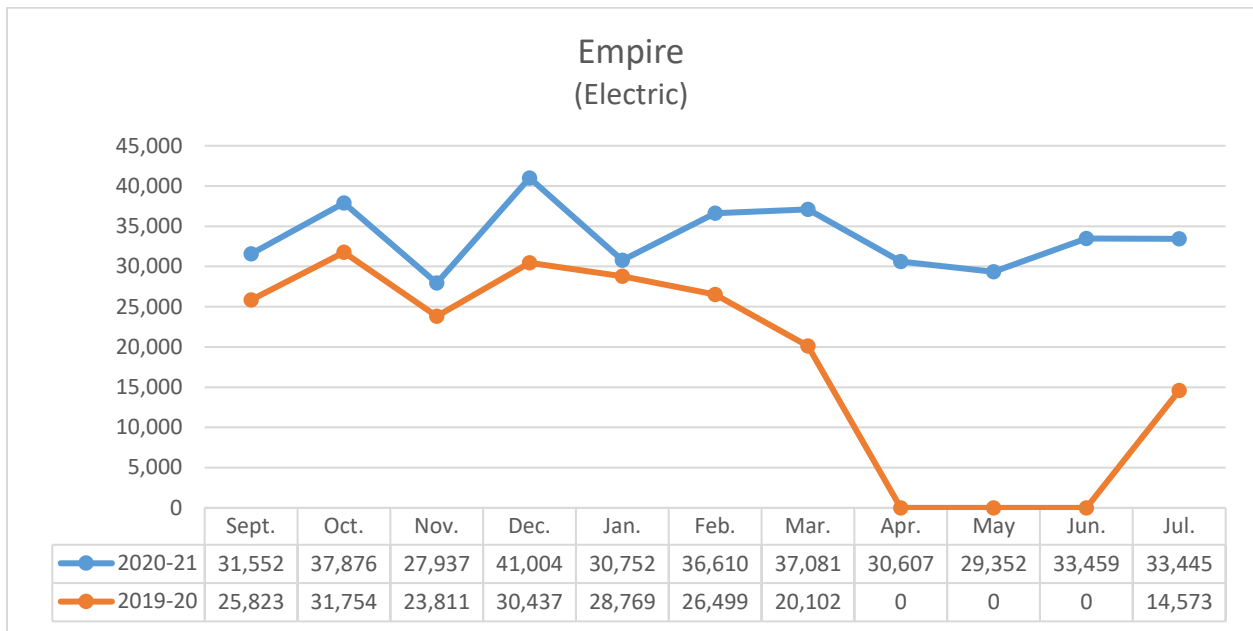
**Questions 1 & 3 (Empire – Electric)**

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



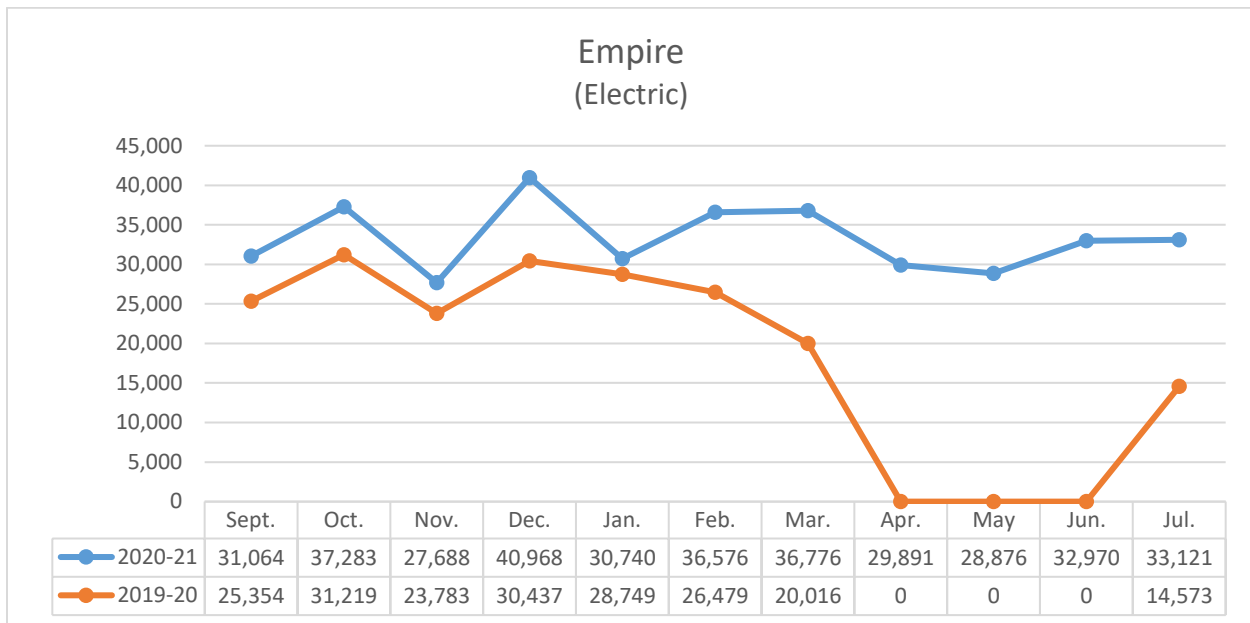
As shown in the previous graph, Empire performed 324 disconnections for non-payment in July 2021 versus none in July 2020 and about 34% fewer in July 2021 than in June 2021. The number of actual disconnections by Empire in July 2021 was 80% below the amount projected by Empire for the same month.

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



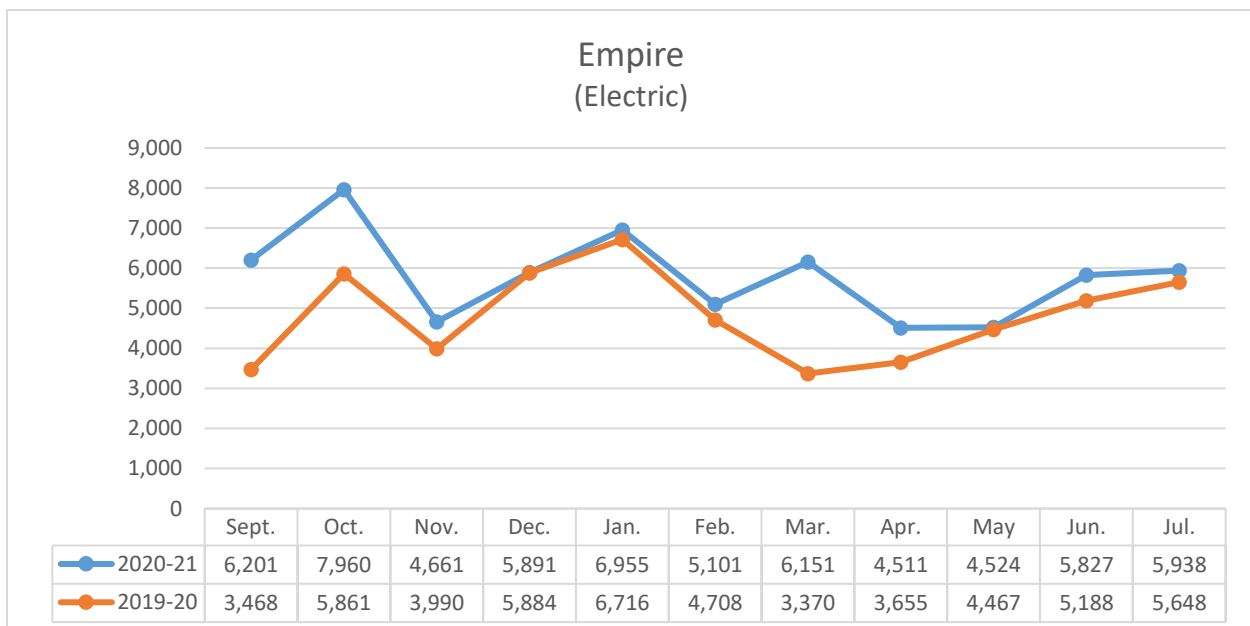
The previous data indicates that there were 129% more Empire customers with past-due accounts in July 2021 versus July 2020 and approximately the same number of customers with past-due accounts in July 2021 compared to June 2021. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement due date.

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



As shown by Empire’s data, for those customers who received a final disconnection notice there were about 127% more customers who were not disconnected in July 2021 versus July 2020 and approximately .5% more in July 2021 than in June 2021.

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

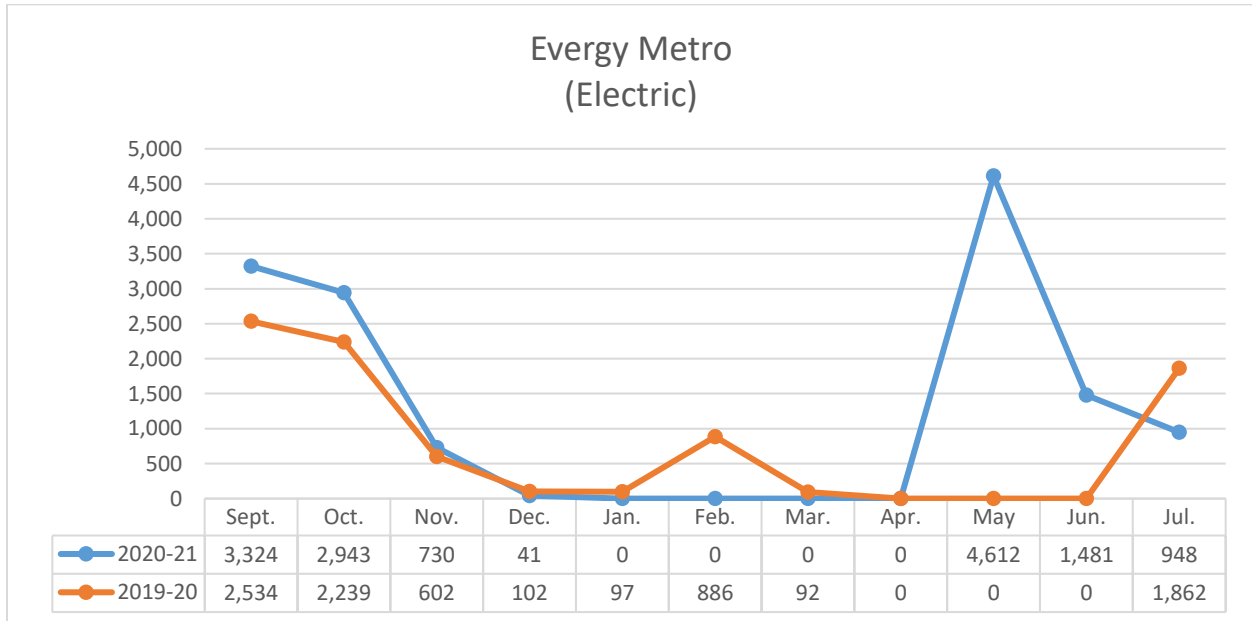




The previous graph illustrates that there were approximately 5% more Empire customers who participated in payment plans in July 2021 versus July 2020 and about 2% more in July 2021 than in June 2021.

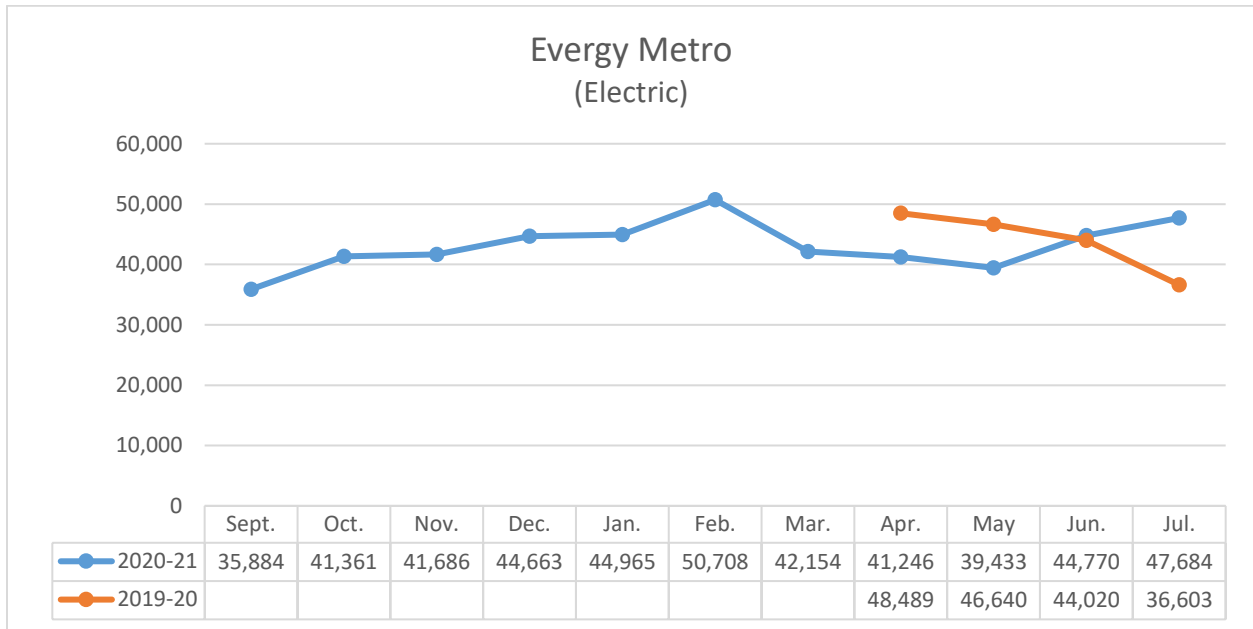
**Questions 1 & 3 (Evergy Metro – Electric)**

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



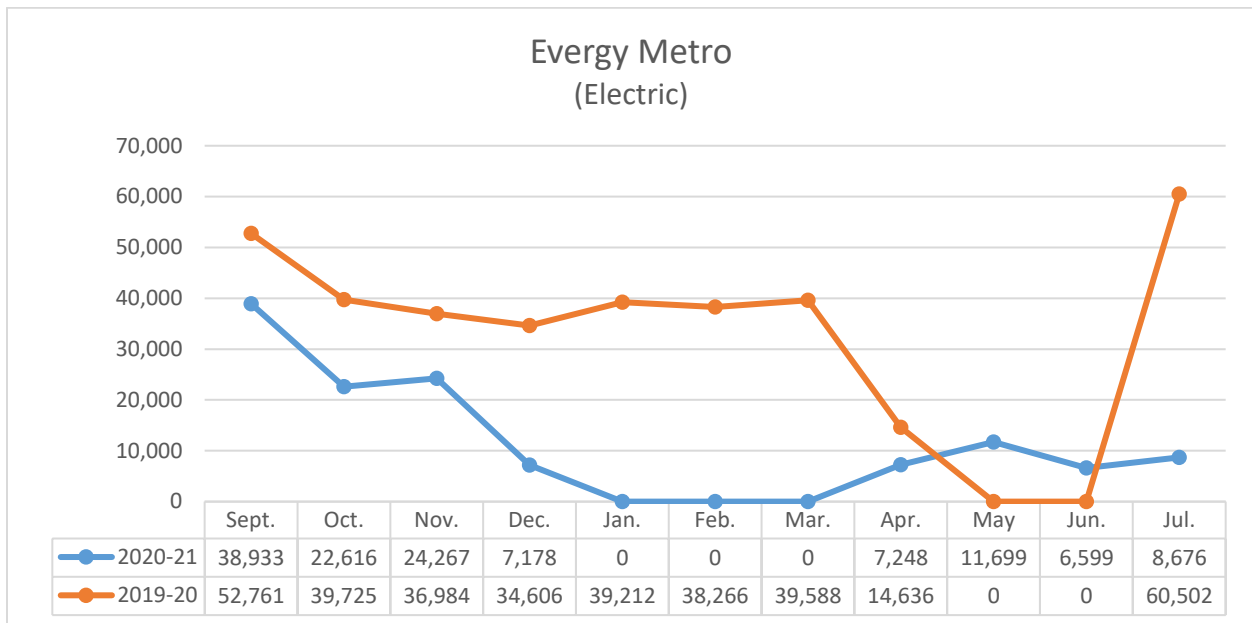
As shown in the previous graph, Evergy Metro performed 49% fewer disconnections for non-payment in July 2021 versus July 2020 and about 36% fewer in July 2021 than in June 2021. The number of actual disconnections by Evergy Metro in July 2021 was about 71% below the amount projected by Evergy Metro for the same month.

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



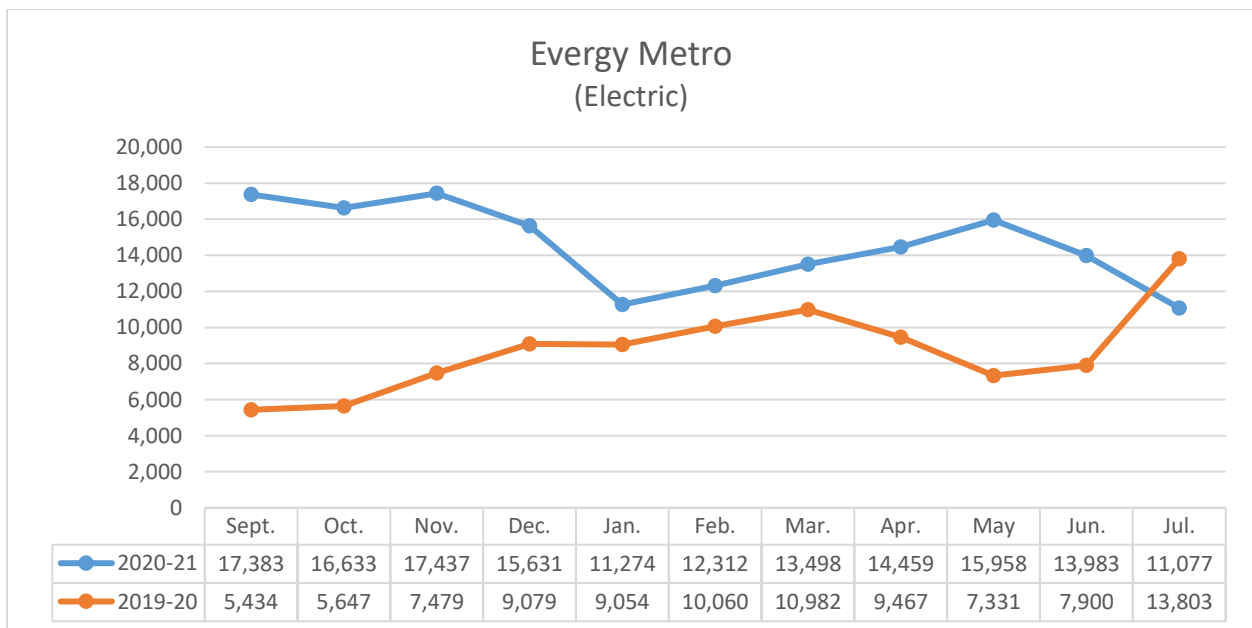
The previous data indicates that there were 30% more Evergy Metro customers with past-due accounts in July 2021 versus July 2020 and approximately 7% more in July 2021 than in June 2021. Evergy Metro defines past-due accounts as accounts that are more than 30 days in arrears.

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



As shown by Evergy Metro’s data, for those customers who received a final disconnection notice, there were 86% fewer customers who were not disconnected in July 2021 versus July 2020 and approximately 31% more customers in July 2021 than in June 2021.

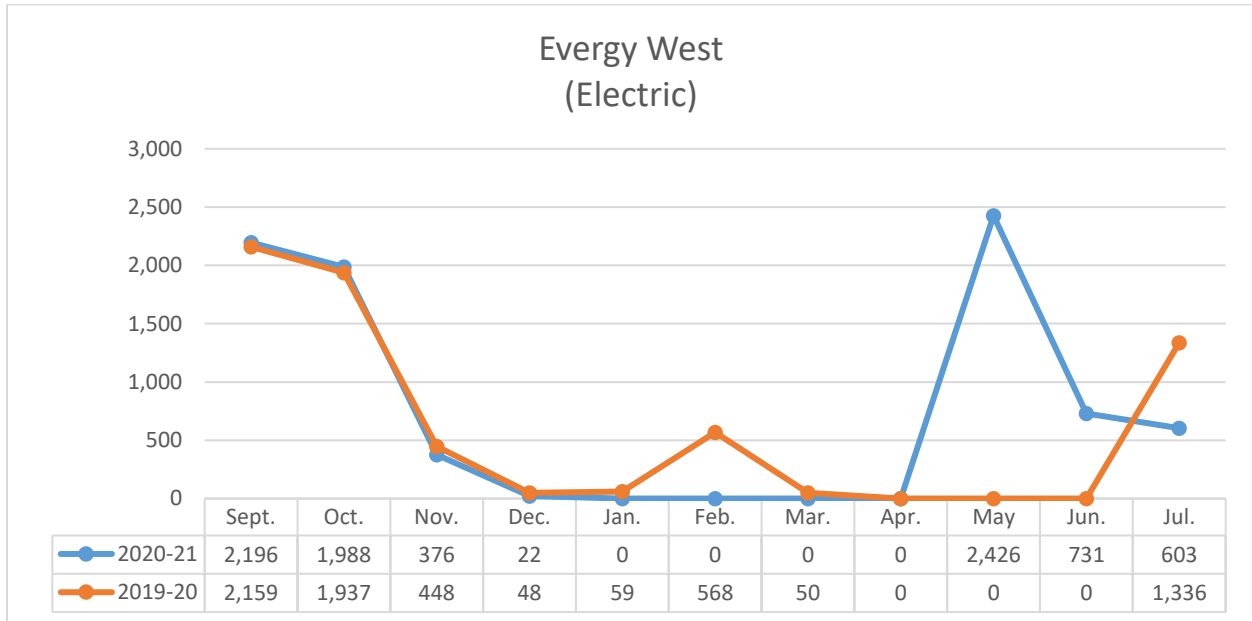
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 20% fewer Evergy Metro customers who participated in payment plans in July 2021 versus July 2020 and about 21% fewer in July 2021 than in June 2021.

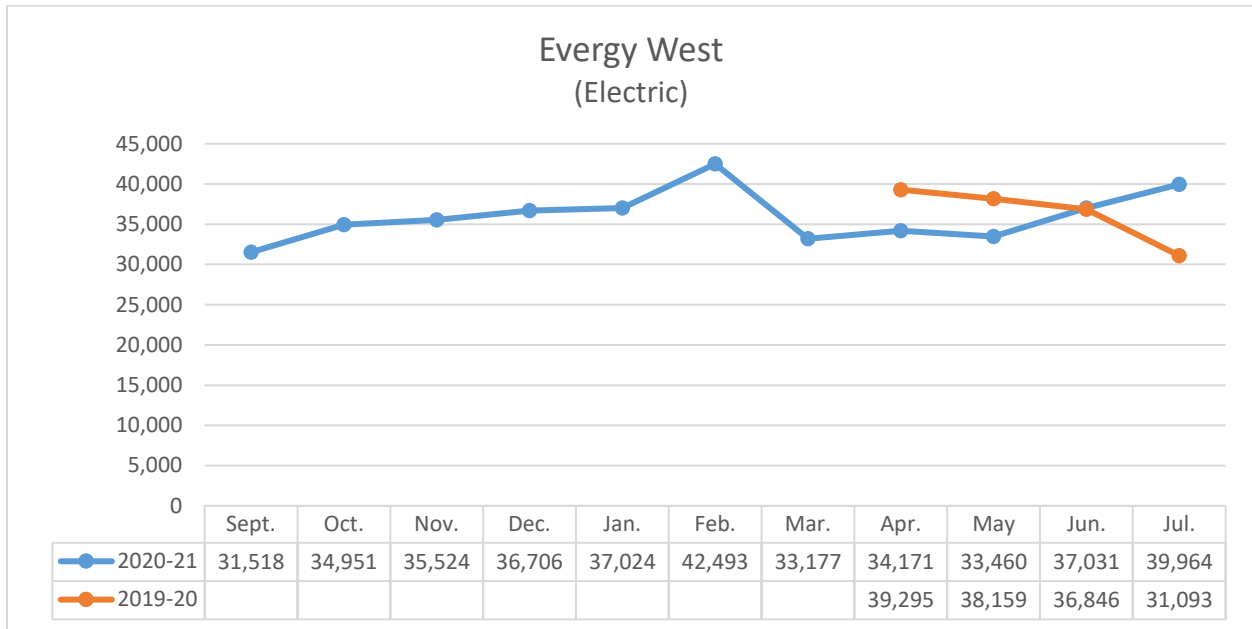
**Questions 1 & 3 (Evergy West – Electric)**

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



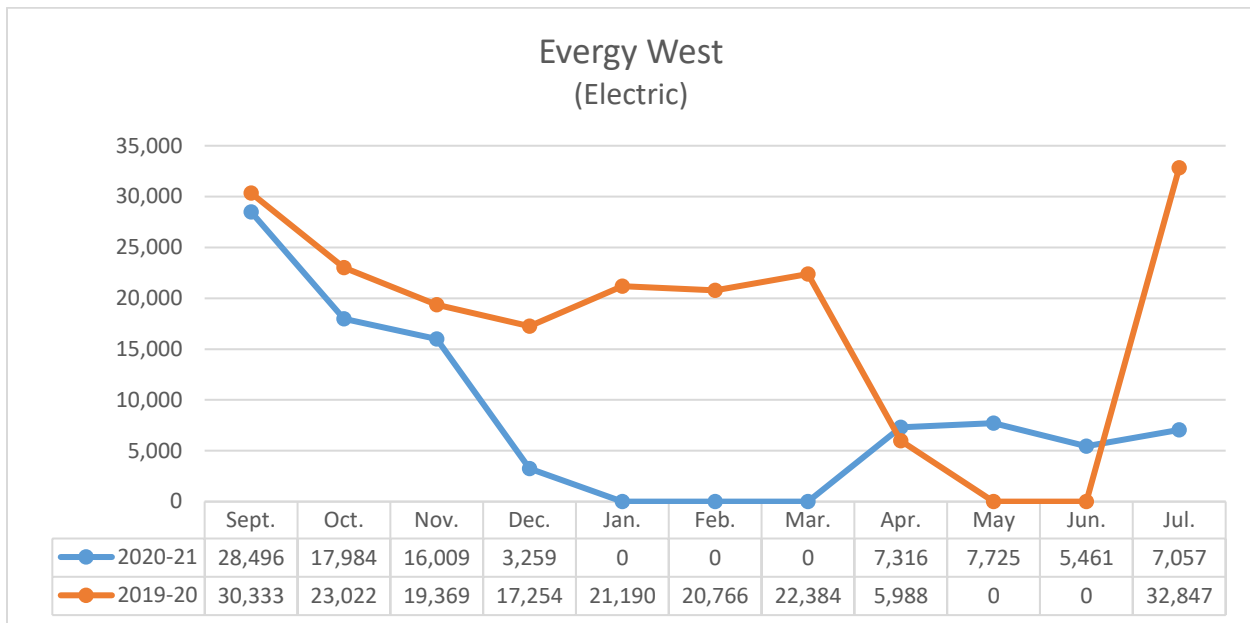
As shown in the previous graph, Evergy West performed 55% fewer disconnections for non-payment in July 2021 versus July 2020 and 18% fewer in July 2021 than in June 2021. The number of actual disconnections by Evergy West in June 2021 was 73% less than the amount projected by Evergy West for the same month.

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



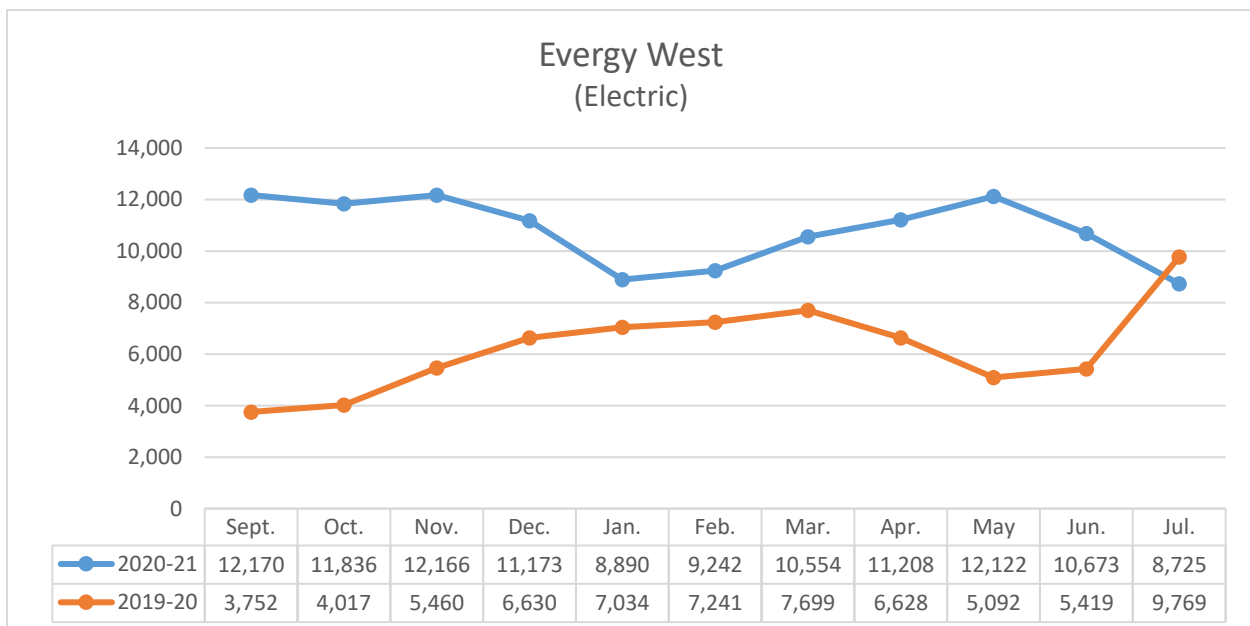
The previous data indicates that there were 28% more Evergy West customers with past-due accounts in July 2021 versus July 2020 and approximately 8% more in July 2021 than in June 2021. Evergy West defines past-due accounts as accounts that are more than 30 days in arrears.

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



As shown by Evergy West’s data, for those customers who received a final disconnection notice, there were 79% fewer customers who were not disconnected in July 2021 versus July 2020 and approximately 29% more customers in July 2021 than in June 2021.

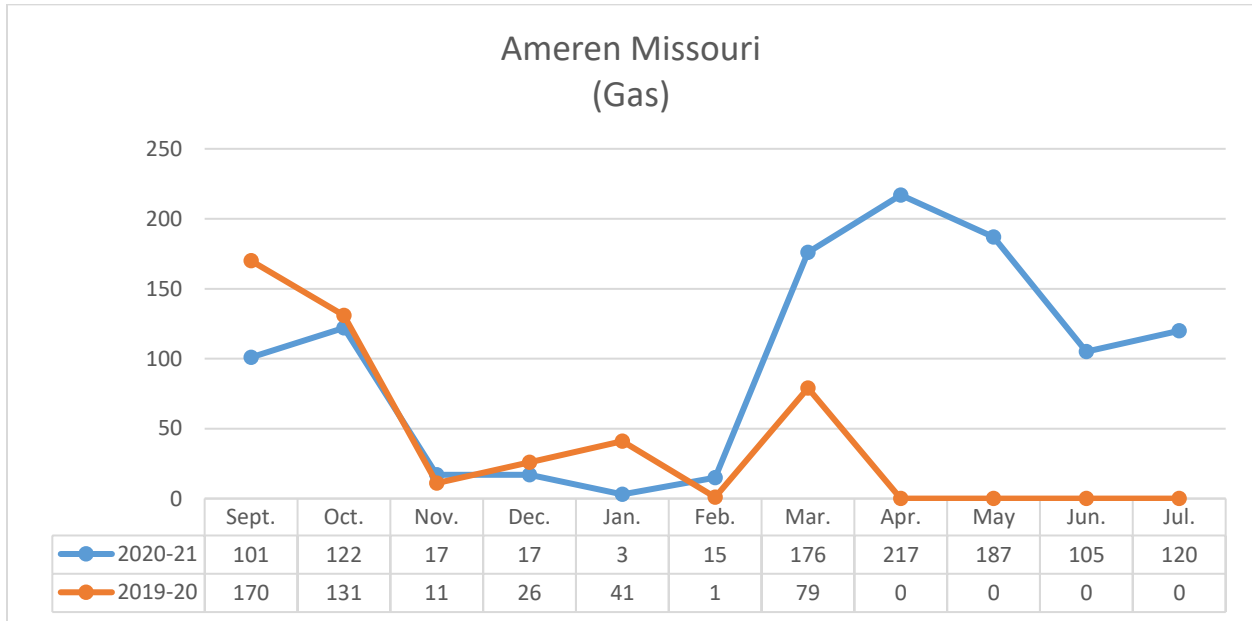
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 11% fewer Evergy West customers who participated in payment plans in July 2021 versus July 2020 and about 18% fewer in July 2021 than in June 2021.

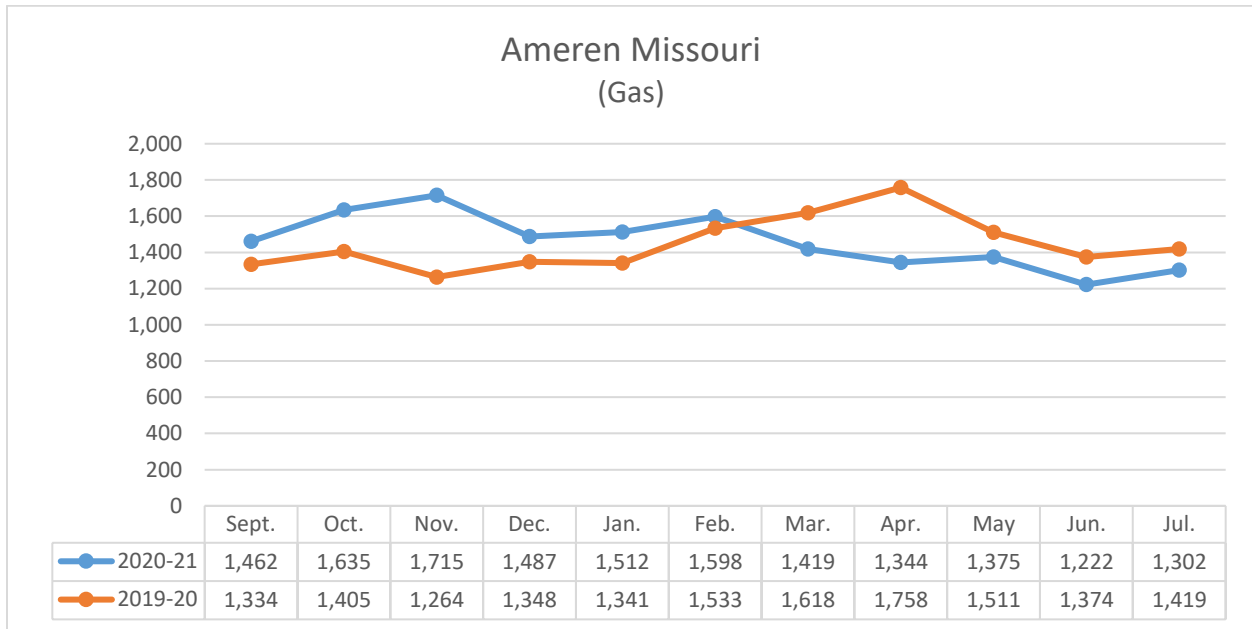
**Questions 1 & 3 (Ameren Missouri – Gas)**

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



As shown in the previous graph, Ameren Missouri performed 120 disconnections for non-payment in July 2021 versus none in July 2020 and about 14% more in July 2021 than in June 2021. The number of actual disconnections by Ameren Missouri in July 2021 was 71% above the amount projected by Ameren Missouri for the same month.

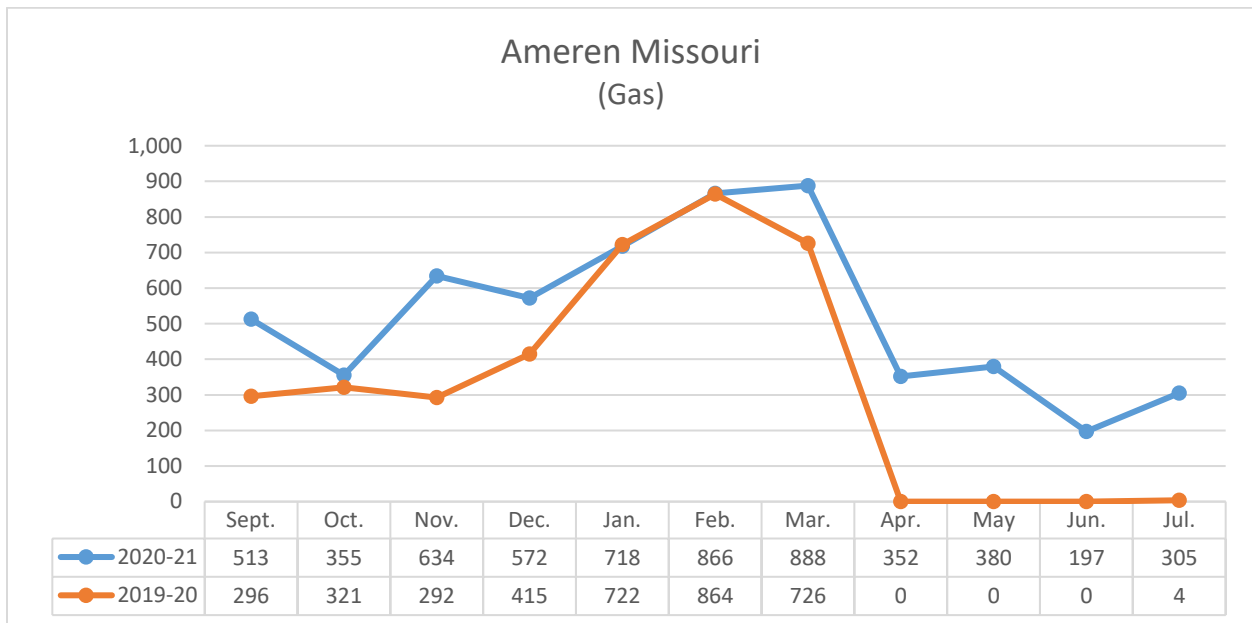
**b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”**



The previous data indicates that there were approximately 8% fewer Ameren Missouri customers with past-due accounts in July 2021 versus July 2020 and approximately 7% more in July 2021 than in June 2021. Ameren Missouri defines “past-due” as more than 30 days from the date the bill is issued.

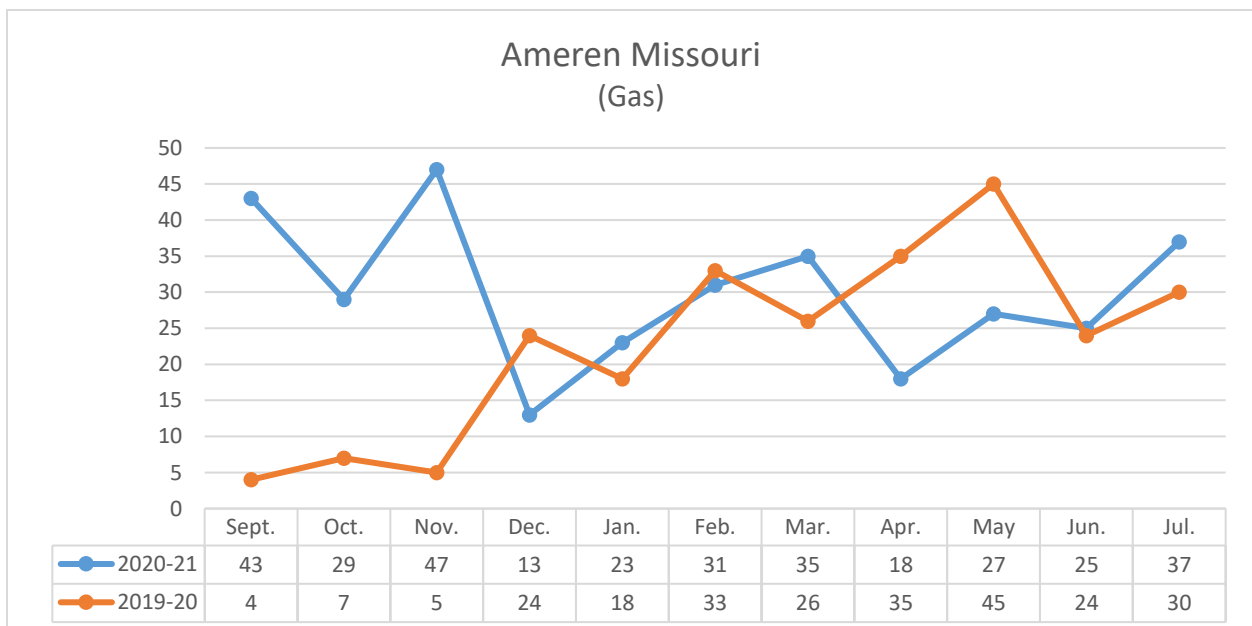


**c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end**



As shown by Ameren Missouri’s data, for those customers who received a final disconnection notice there were 305 customers who were not disconnected in July 2021 versus four in July 2020 and approximately 55% more in July 2021 than in June 2021.

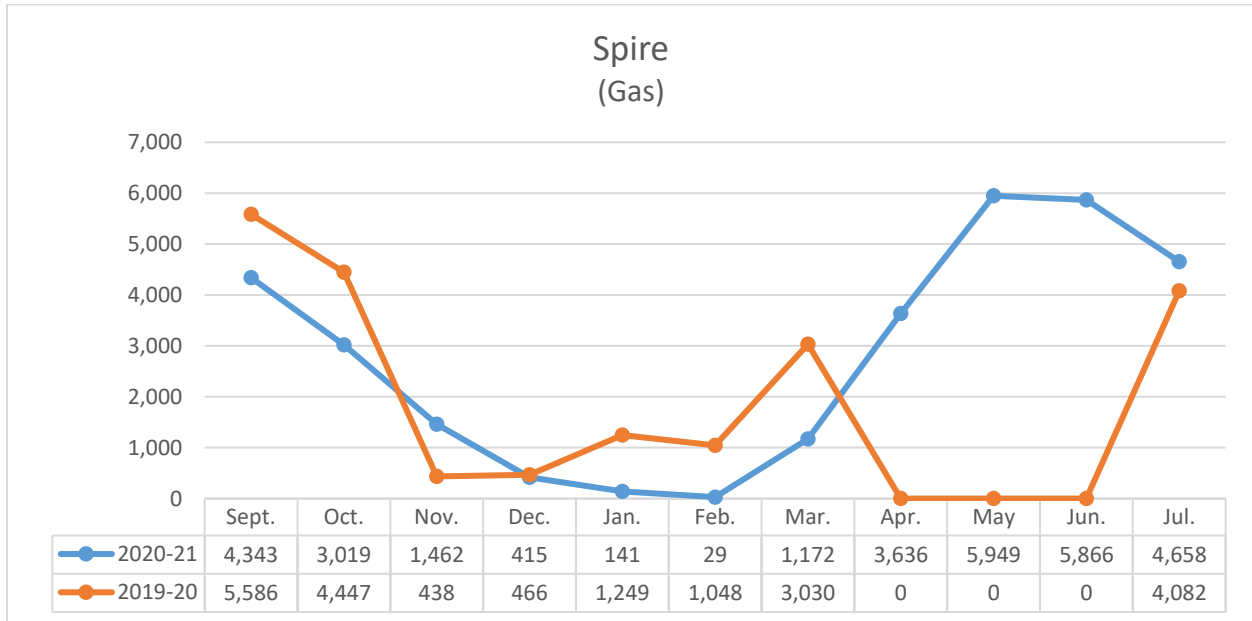
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 23% more Ameren Missouri customers who participated in payment plans in July 2021 versus July 2020 and about 48% more in July 2021 than in June 2021.

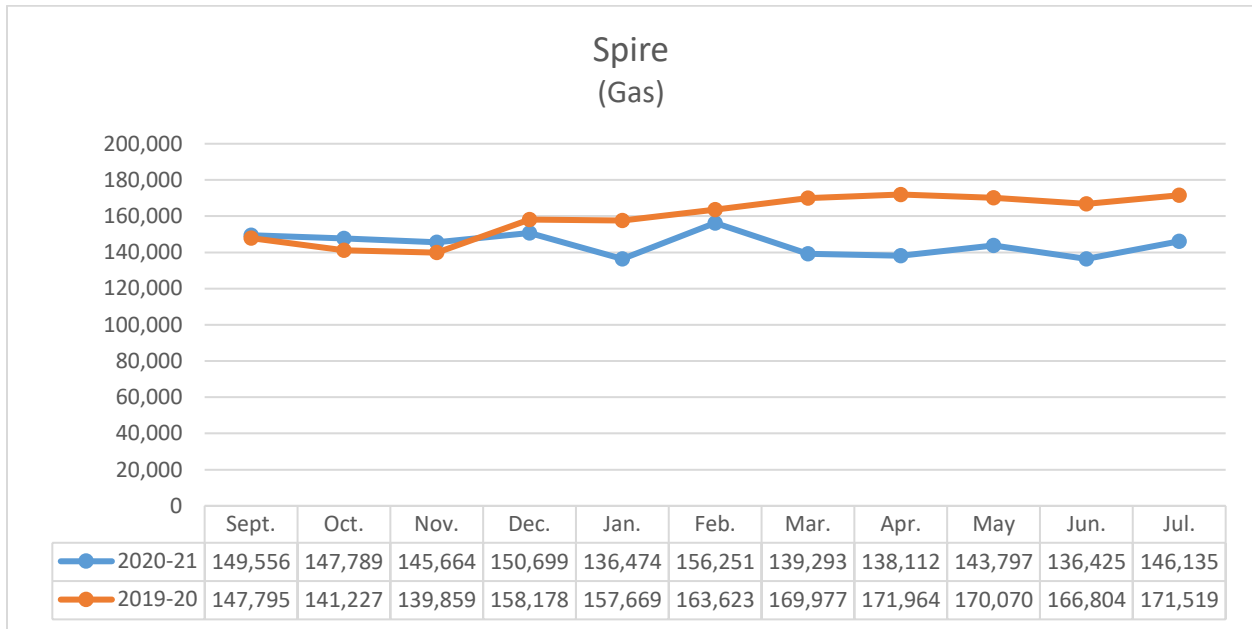
**Questions 1 & 3 (Spire - Gas)**

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



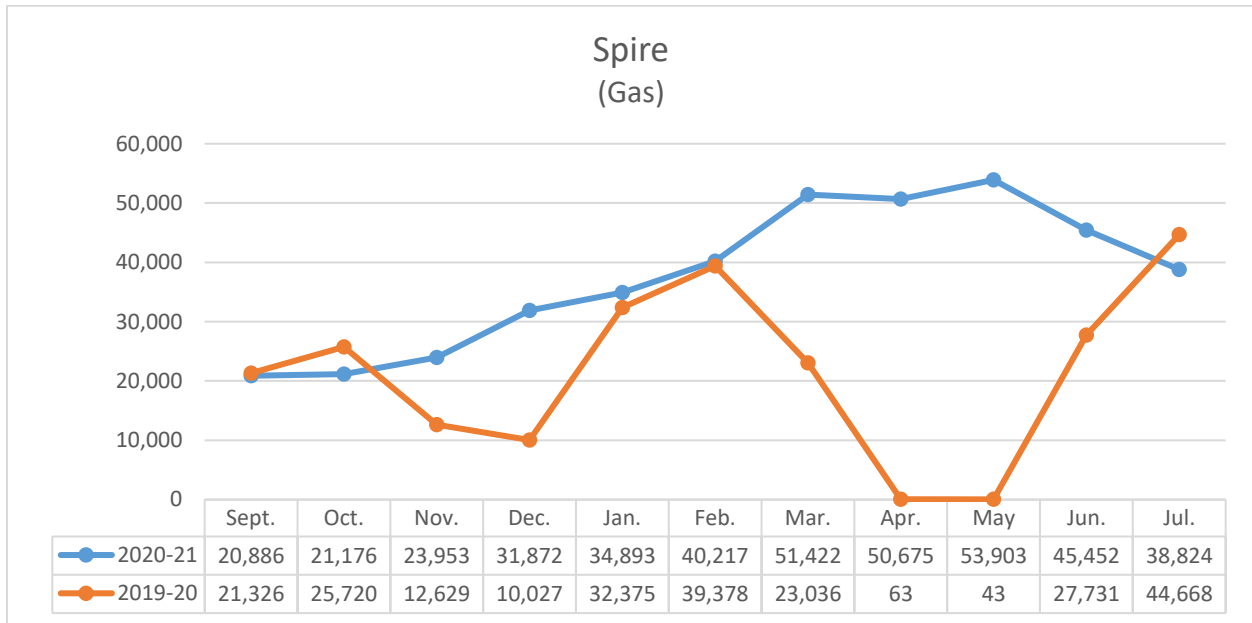
As shown in the previous graph, Spire performed 14% more disconnections for non-payment in July 2021 versus July 2020 and approximately 21% fewer in July 2021 than in June 2021. The number of actual disconnections by Spire in June 2021 was 38% below the amount projected by Spire for the same month.

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



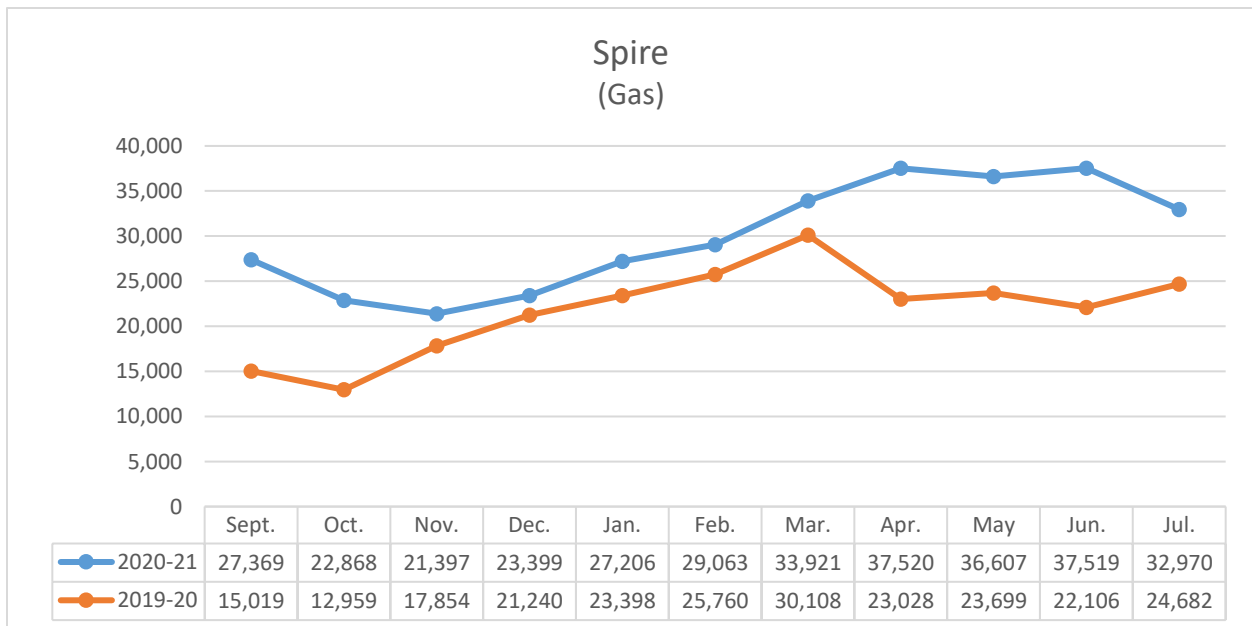
The previous data indicates that there were about 15% fewer Spire customers with past-due accounts in July 2021 versus July 2020 and approximately 7% more in July 2021 than in June 2021. Spire reported that past-due accounts are defined as accounts with arrear amounts owed for over 30 days that were not final billed at month’s end.

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



As shown by Spire’s data, for those customers who received a final disconnection notice there were about 13% fewer customers who were not disconnected in July 2021 versus in July 2020 and approximately 15% fewer in July 2021 than in June 2021.

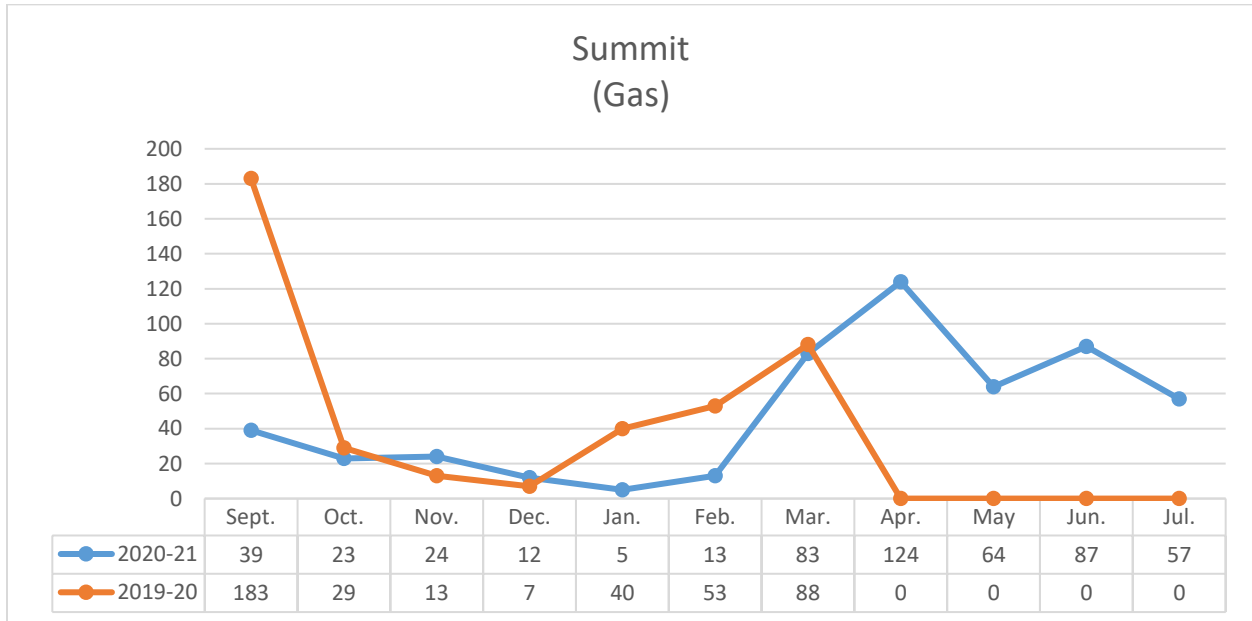
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 34% more Spire customers who participated in payment plans in July 2021 versus July 2020 and about 12% fewer in July 2021 than in June 2021.

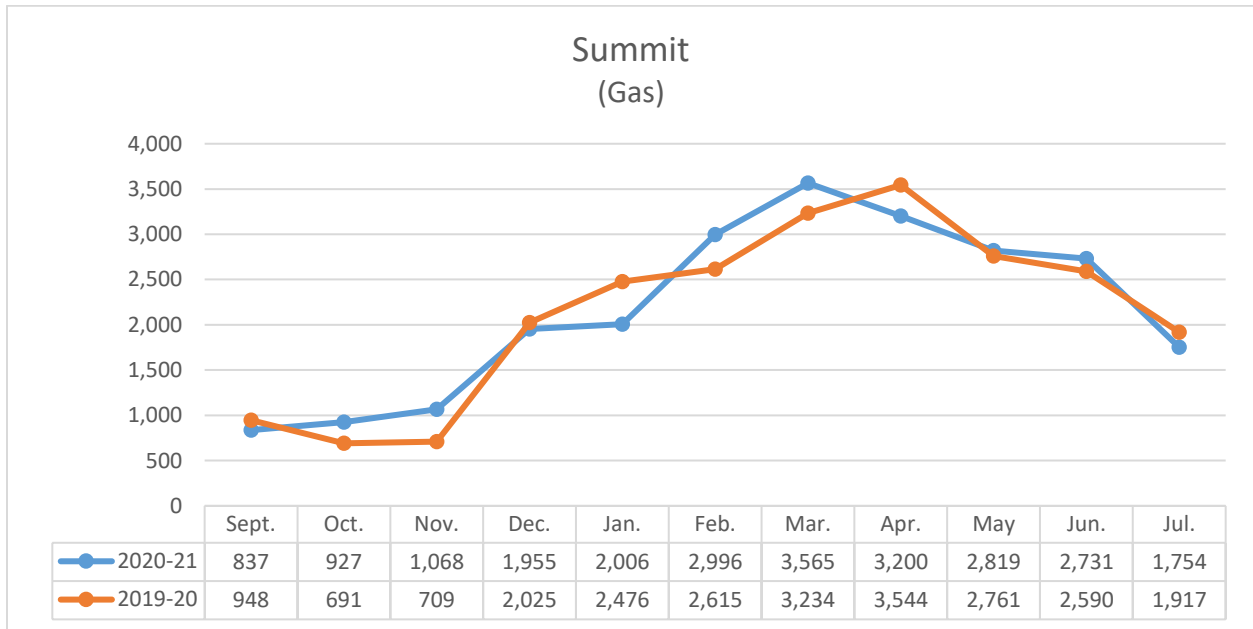
**Questions 1 & 3 (Summit - Gas)**

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



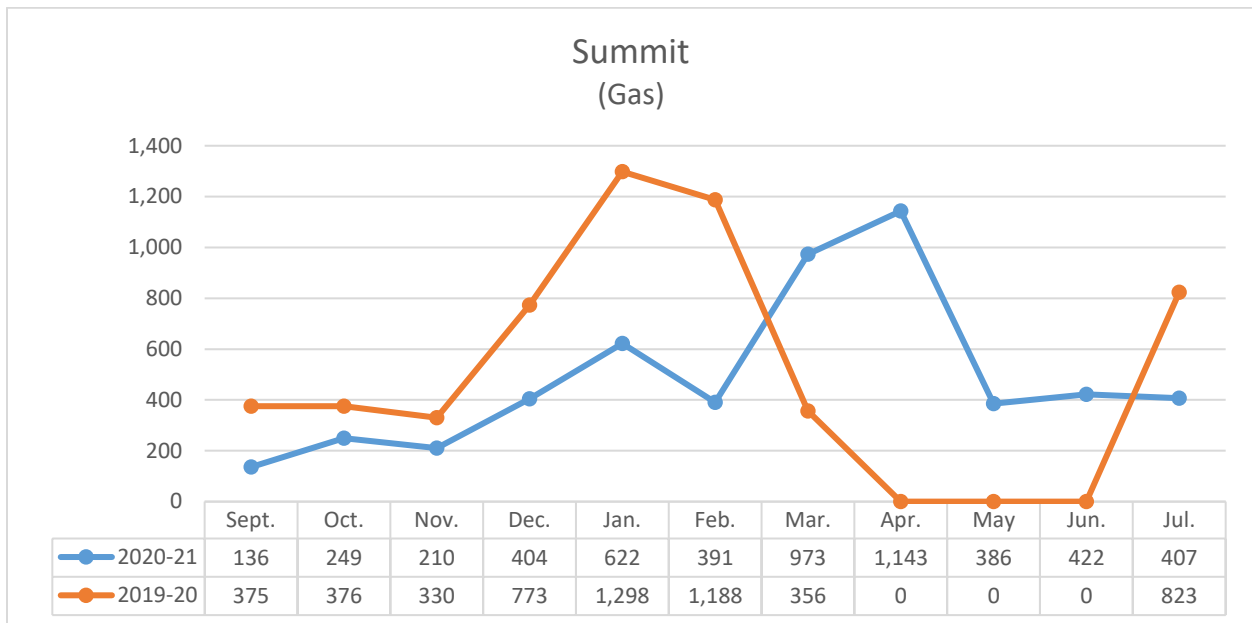
As shown in the previous graph, Summit performed 57 disconnections for non-payment in July 2021 versus none in July 2020 and about 34% fewer in July 2021 than in June 2021. The number of actual disconnections by Summit in July 2021 was about 62% below the amount projected by Summit for the same month.

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



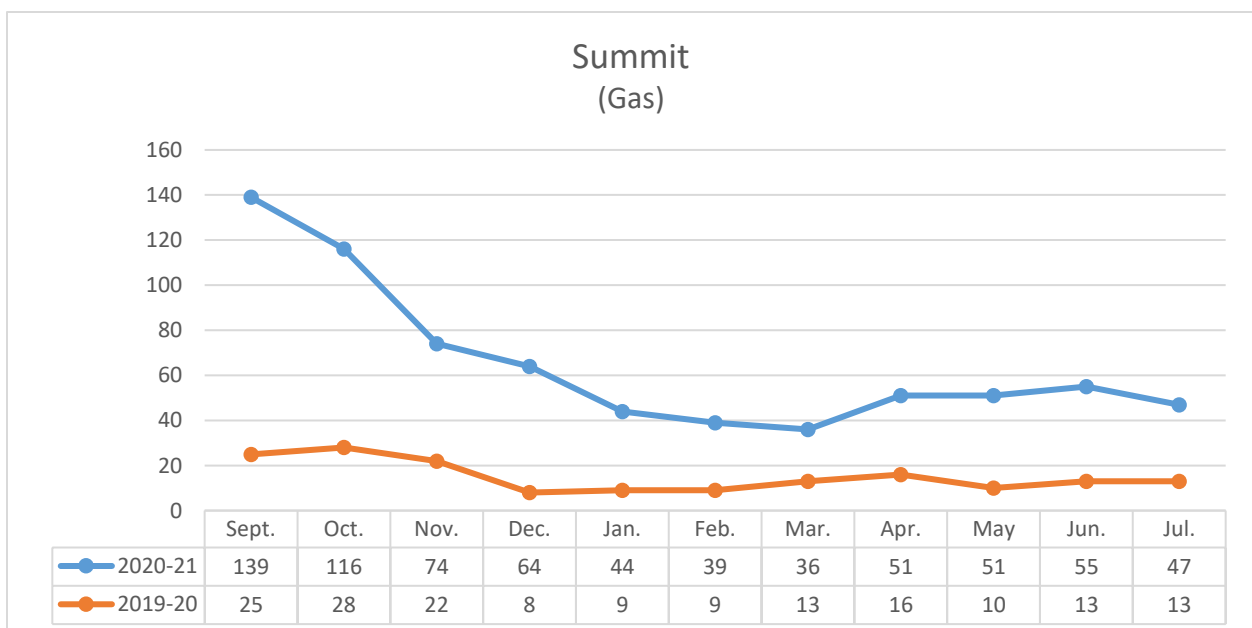
The previous data indicates that there were about 9% fewer Summit customers with past-due accounts in July 2021 versus July 2020 and approximately 36% fewer in July 2021 than in June 2021. Summit did not respond how it defines past-due accounts.

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



As shown by Summit’s data, for those customers who received a final disconnection notice there were 51% fewer customers who were not disconnected in July 2021 versus July 2020 and approximately 4% fewer in July 2021 than in June 2021.

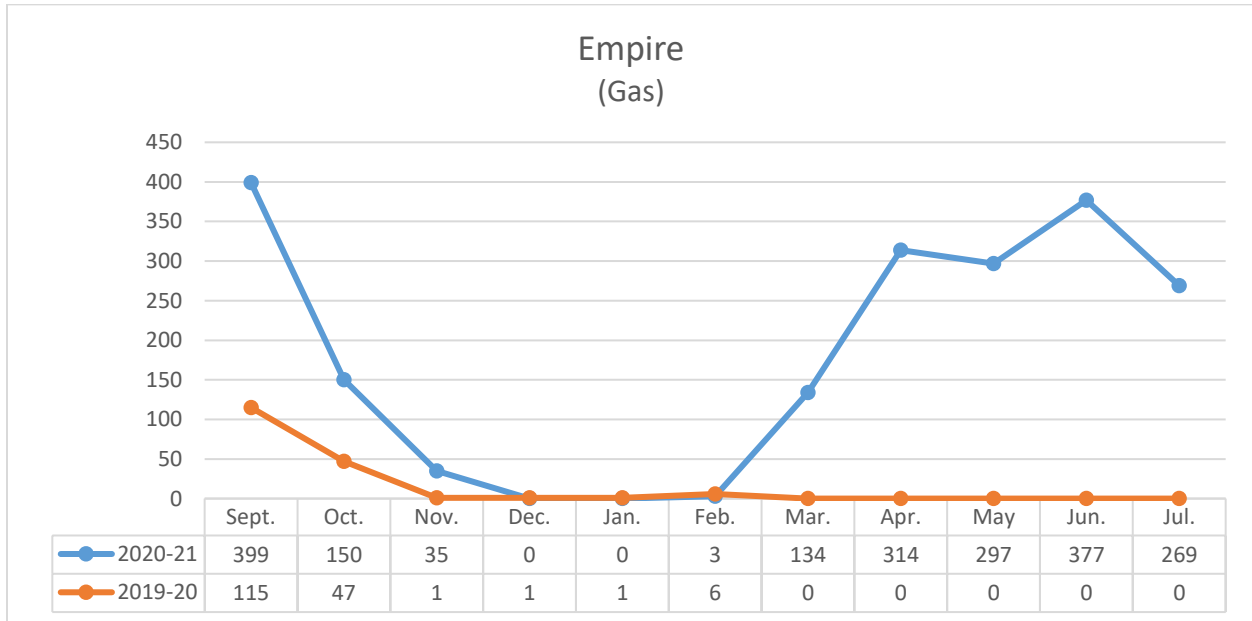
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 262% more Summit customers who participated in payment plans in July 2021 versus July 2020 and 15% fewer customers who participated in payment plans in July 2021 than in June 2021.

**Questions 1 & 3 (Empire - Gas)**

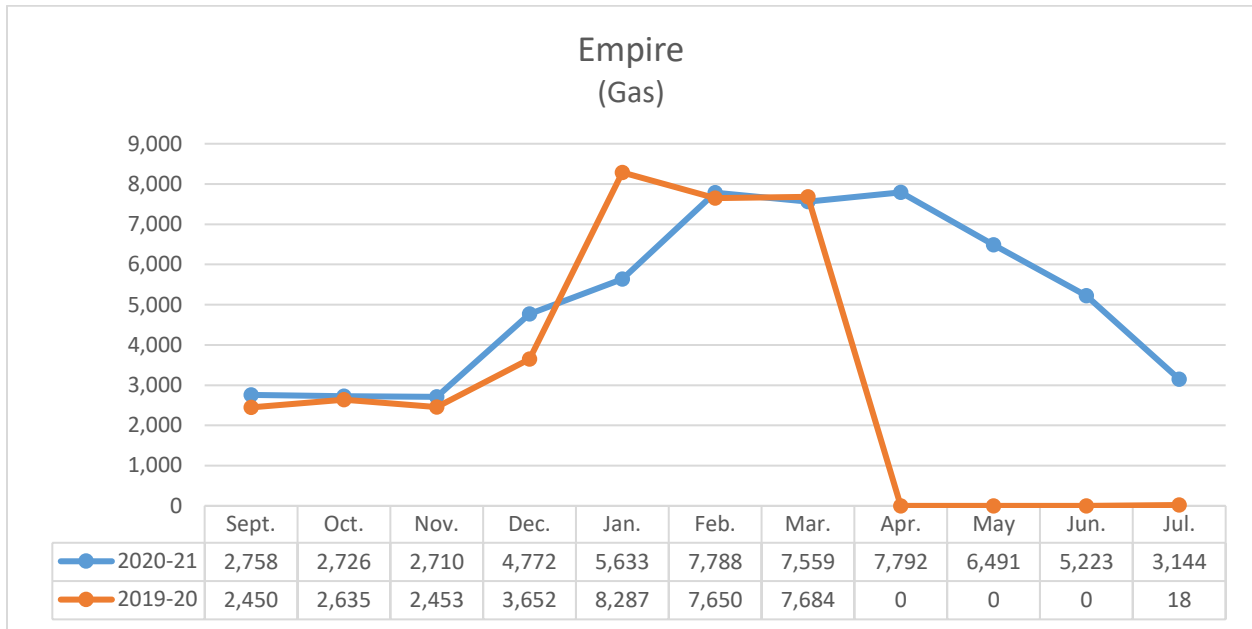
**a) The number of disconnections for non-payment of services as of each month-end**



As shown in the previous graph, Empire performed 269 disconnections for non-payment in July 2021 versus none in July 2020 and about 29% fewer in July 2021 than in June 2021. The number of actual disconnections by Empire in July 2021 was about 33% below the amount projected by Empire for the same month.

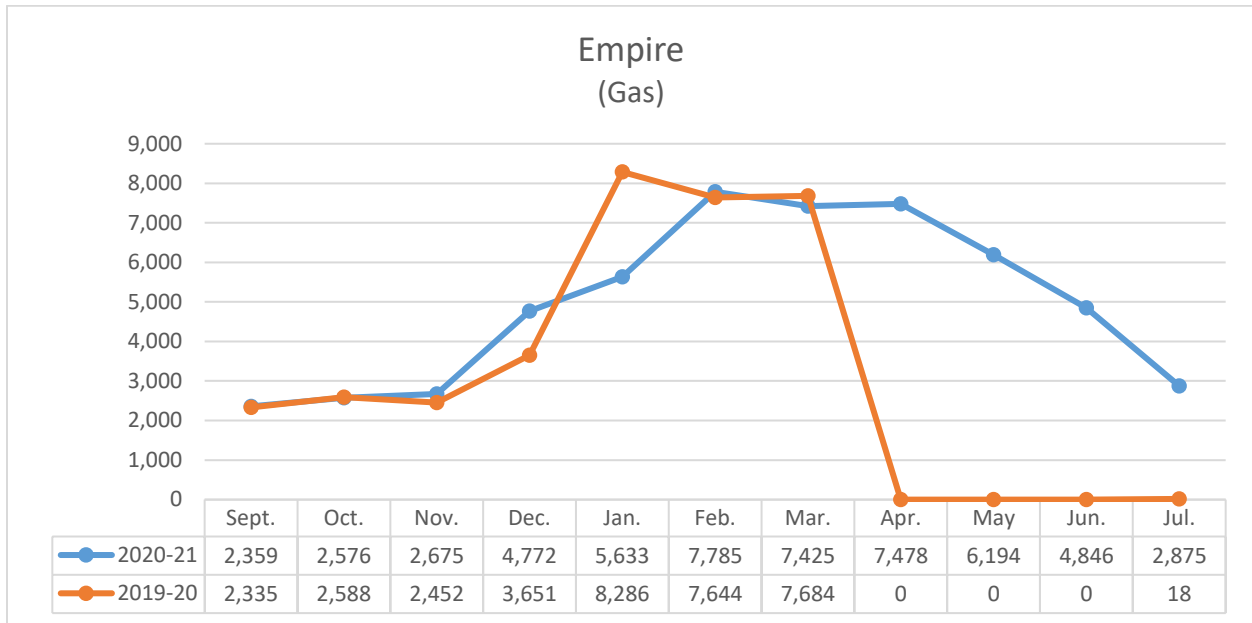


**b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”**



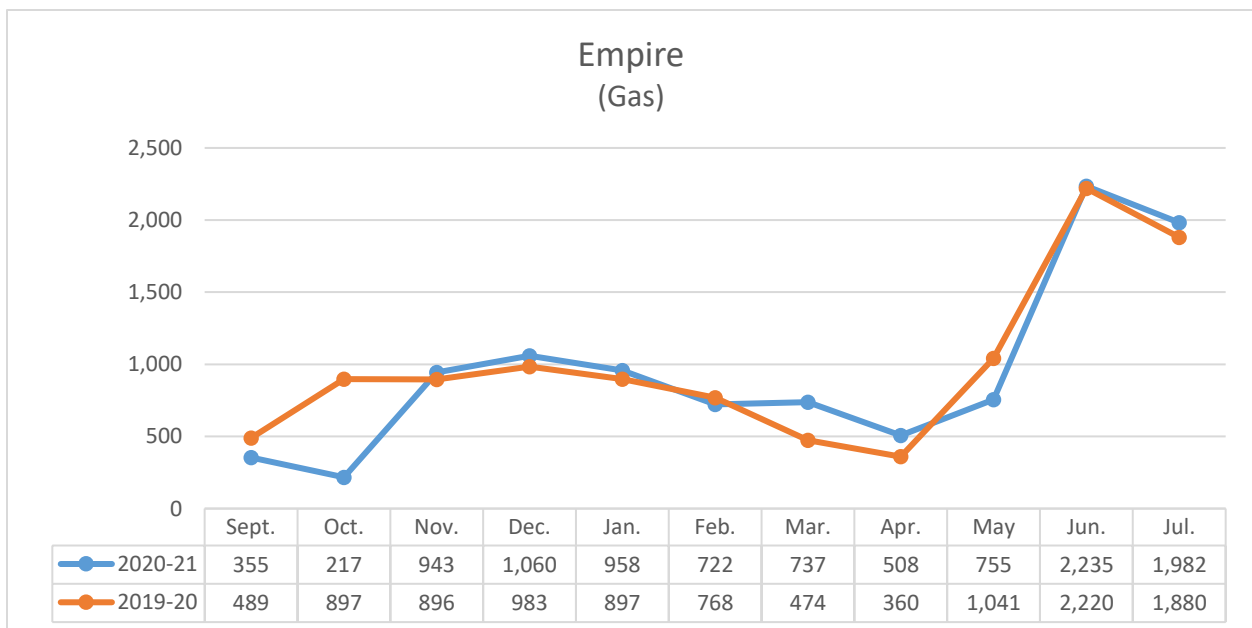
The previous data indicates that there were 3,144 Empire customers with past-due accounts in July 2021 versus 18 in July 2020 and approximately 40% fewer in July 2021 than in June 2021. Empire reported that a shut-off notice is sent for any account that owes \$50.00 or more after the statement due date.

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



As shown by Empire’s data, for those customers who received a final disconnection notice there were 2,875 customers who were not disconnected in July 2021 versus 18 in July 2020 and approximately 41% fewer in July 2021 than in June 2021.

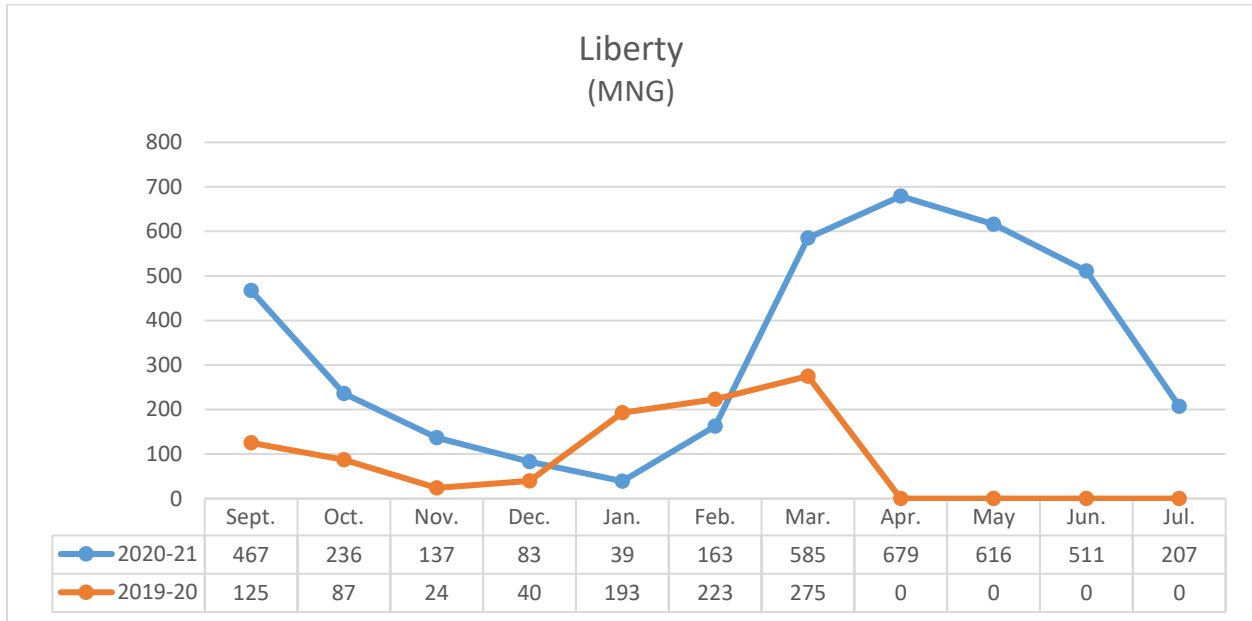
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 5% more Empire customers who participated in payment plans in July 2021 versus July 2020 and about 11% fewer in July 2021 than in June 2021.

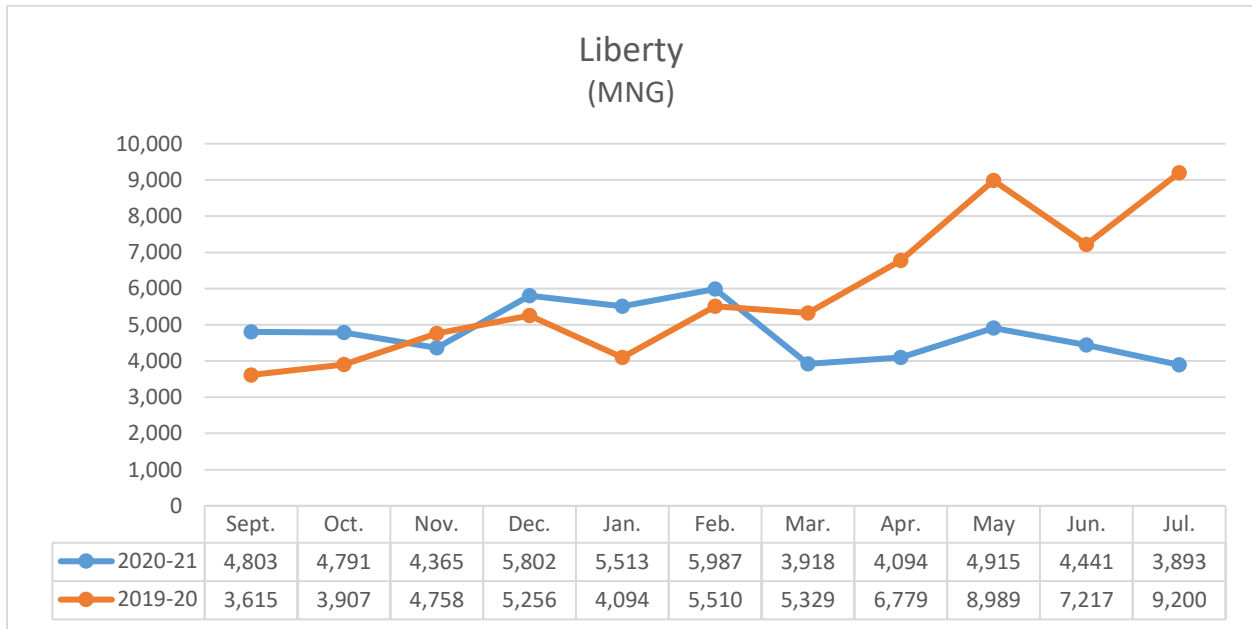
**Questions 1 & 3 (Liberty (MNG) - Gas)**

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



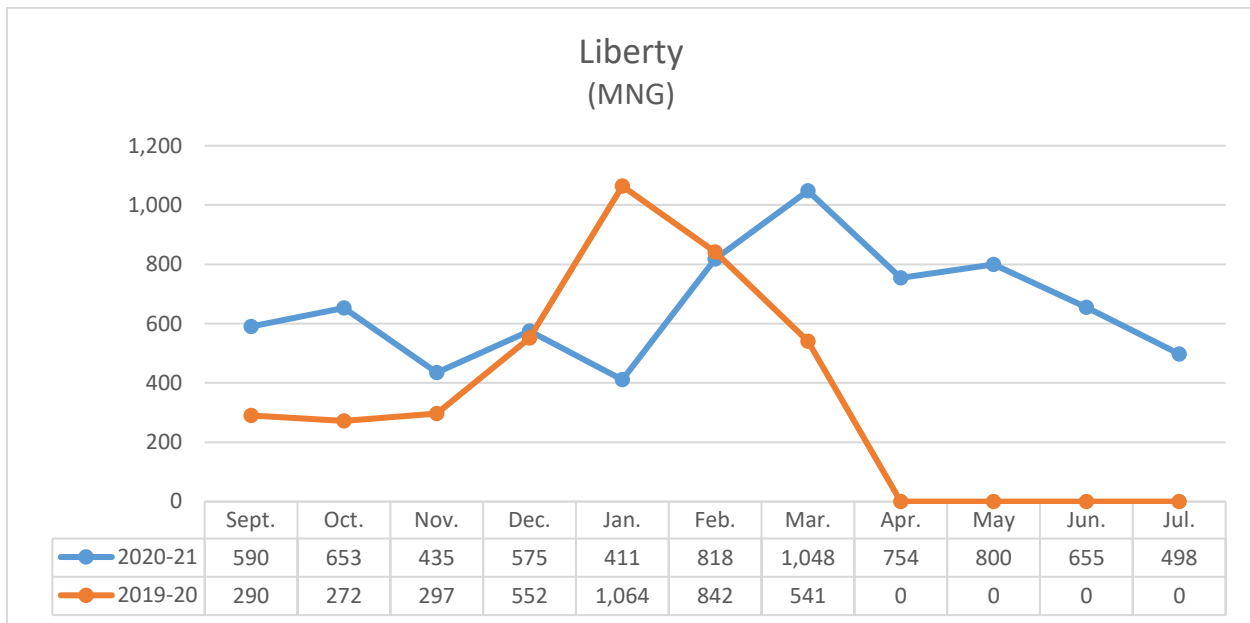
As shown in the previous graph, Liberty (MNG) performed 207 disconnections for non-payment in July 2021 versus none in July 2020 and about 59% fewer in July 2021 than in June 2021. The number of actual disconnections by Liberty (MNG) in July 2021 was about 17% below the amount projected by Liberty (MNG) for the same month.

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



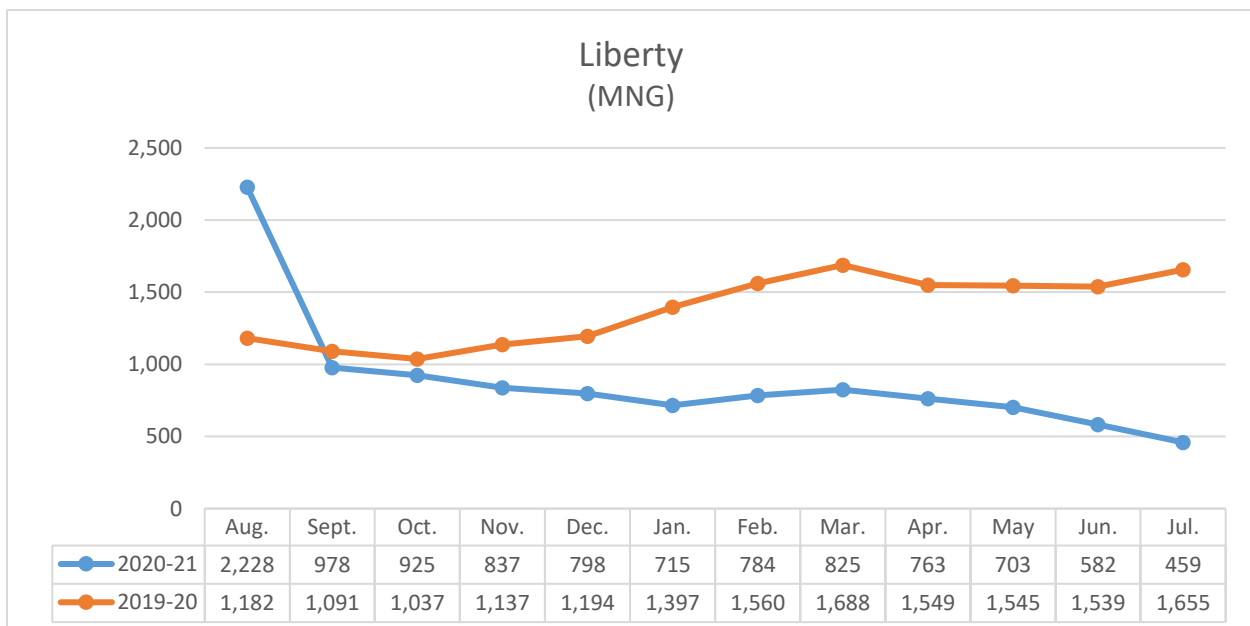
The previous data indicates that there were approximately 58% fewer Liberty (MNG) customers with past-due accounts in July 2021 versus July 2020 and approximately 12% fewer in July 2021 than in June 2021. Liberty (MNG) reported that it considers accounts past due when they have a past due balance for greater than two days and they are not on budget billing.

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



As shown by Liberty (MNG)’s data, for those customers who received a final disconnection notice there were 498 customers who were not disconnected in July 2021 versus none in July 2020 and approximately 24% fewer in July 2021 than in June 2021.

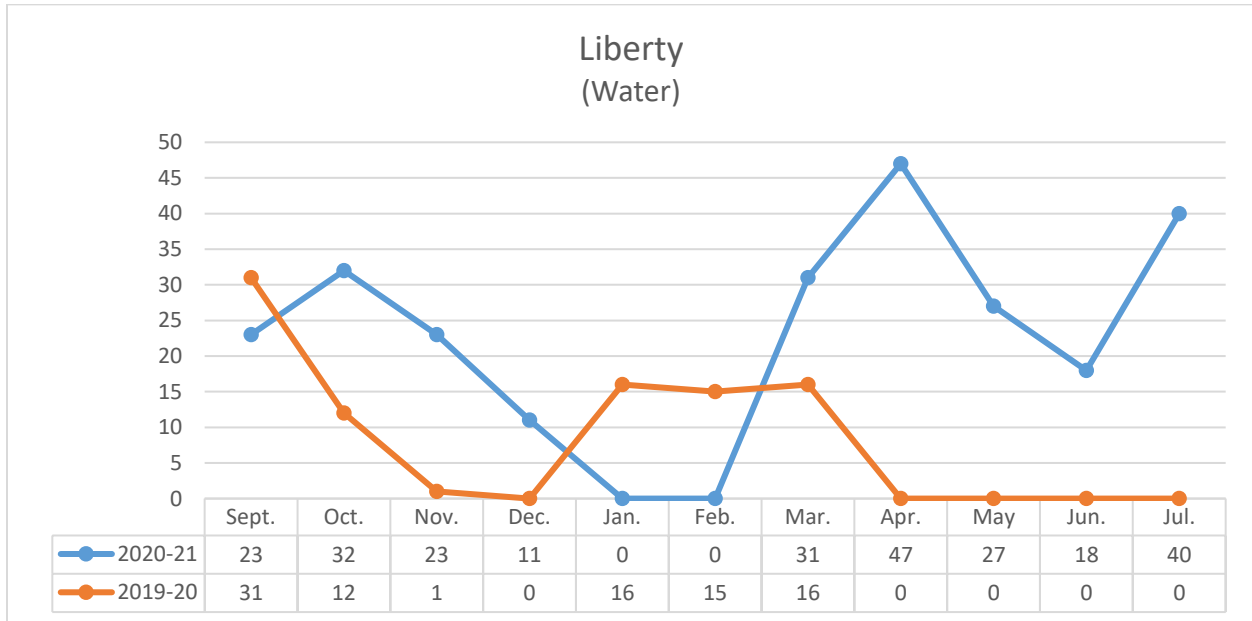
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 72% fewer Liberty (MNG) customers who participated in payment plans in July 2021 versus July 2020 and about 21% fewer in July 2021 than in June 2021.

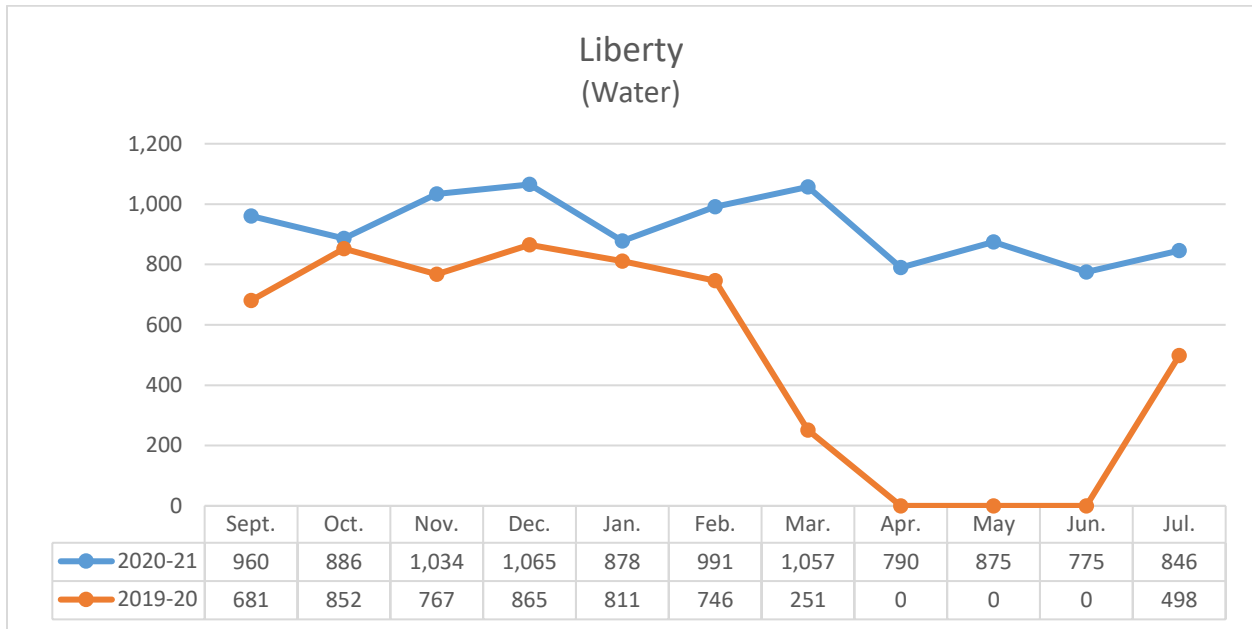
**Questions 1 & 3 (Liberty - Water)**

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



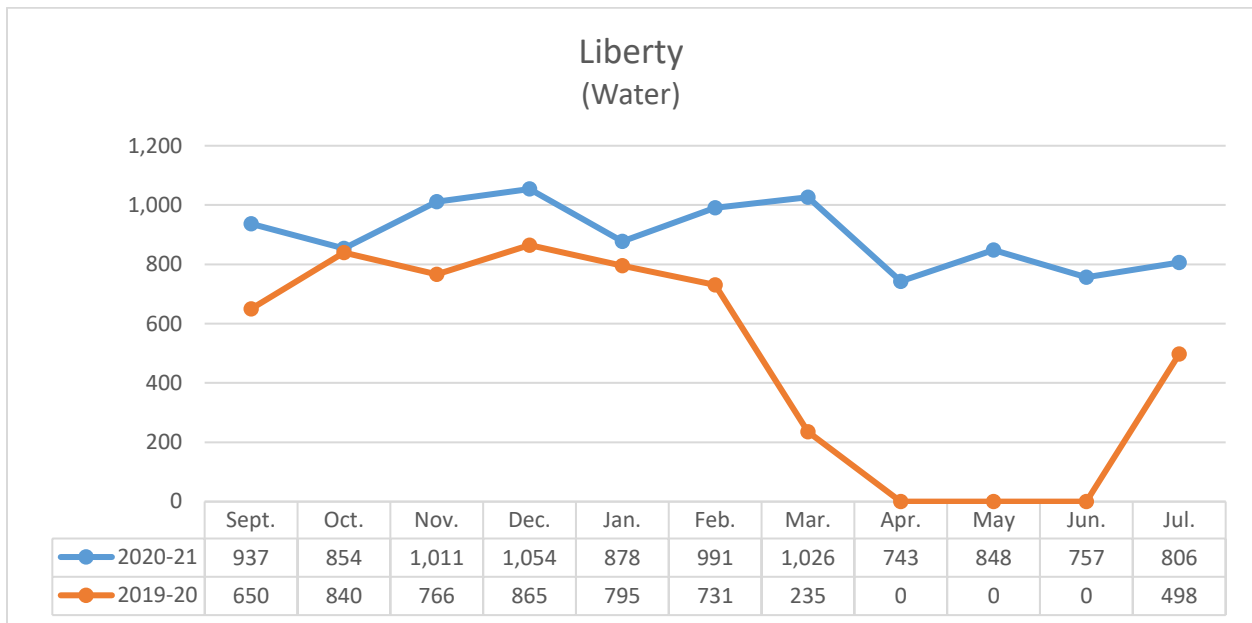
As shown in the previous graph, Liberty performed 40 disconnections for non-payment in July 2021 versus none in July 2020 and about 122% more in July 2021 than in June 2021. The number of actual disconnections by Liberty in July 2021 was about 33% below the amount projected by Liberty for the same month.

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



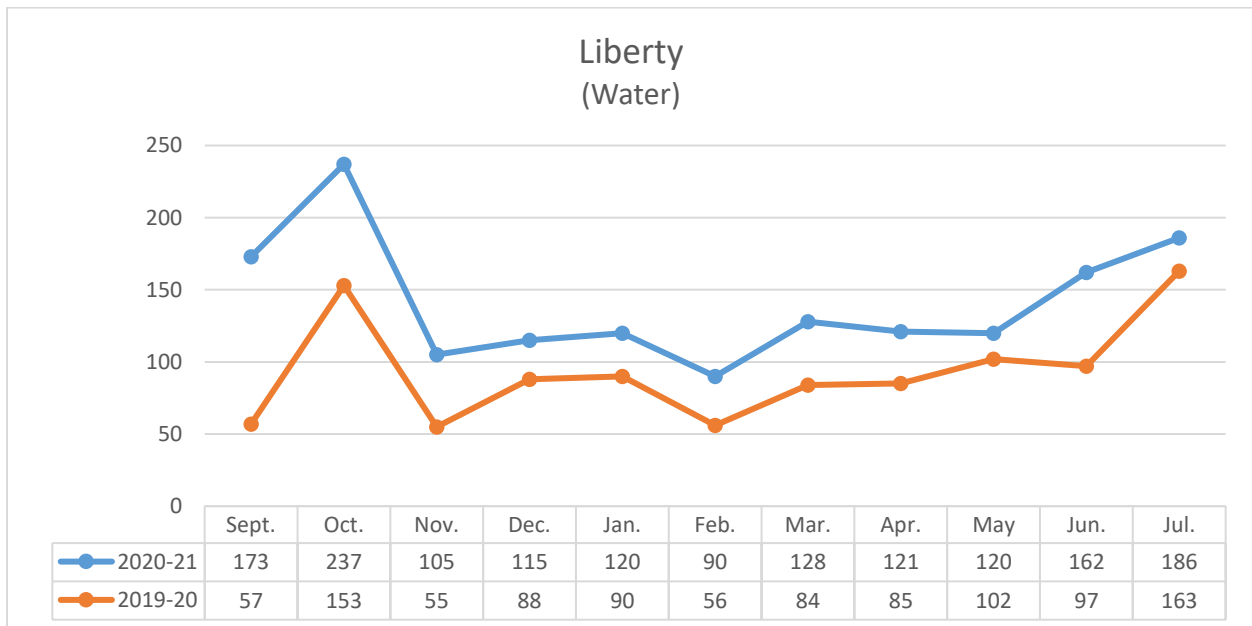
The previous data indicates that there were 70% more Liberty customers with past-due accounts in July 2021 versus July 2020 and approximately 9% more in July 2021 than in June 2021. Liberty reported that it considers accounts past due when they have a past due balance for greater than two days and they are not on budget billing.

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



As shown by Liberty’s data, for those customers who received a final disconnection notice there were 62% more customers who were not disconnected in July 2021 versus July 2020 and approximately 6% more in July 2021 than in June 2021.

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

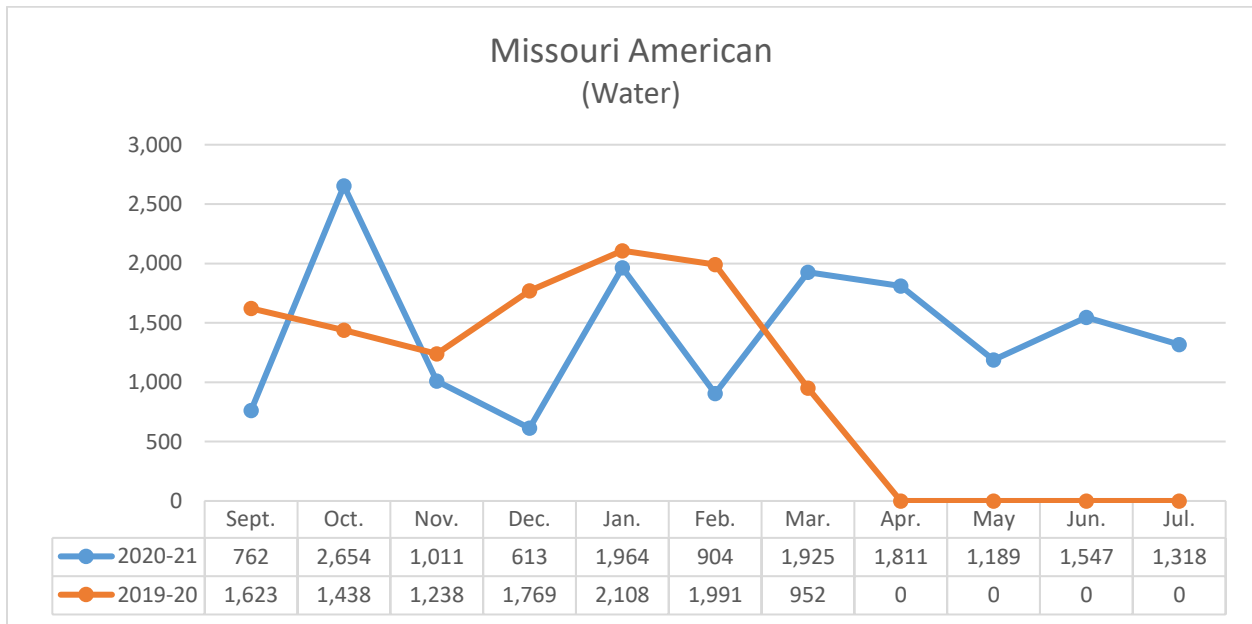




The previous graph illustrates that there were approximately 14% more Liberty customers who participated in payment plans in July 2021 versus July 2020 and about 15% more in July 2021 than in June 2021.

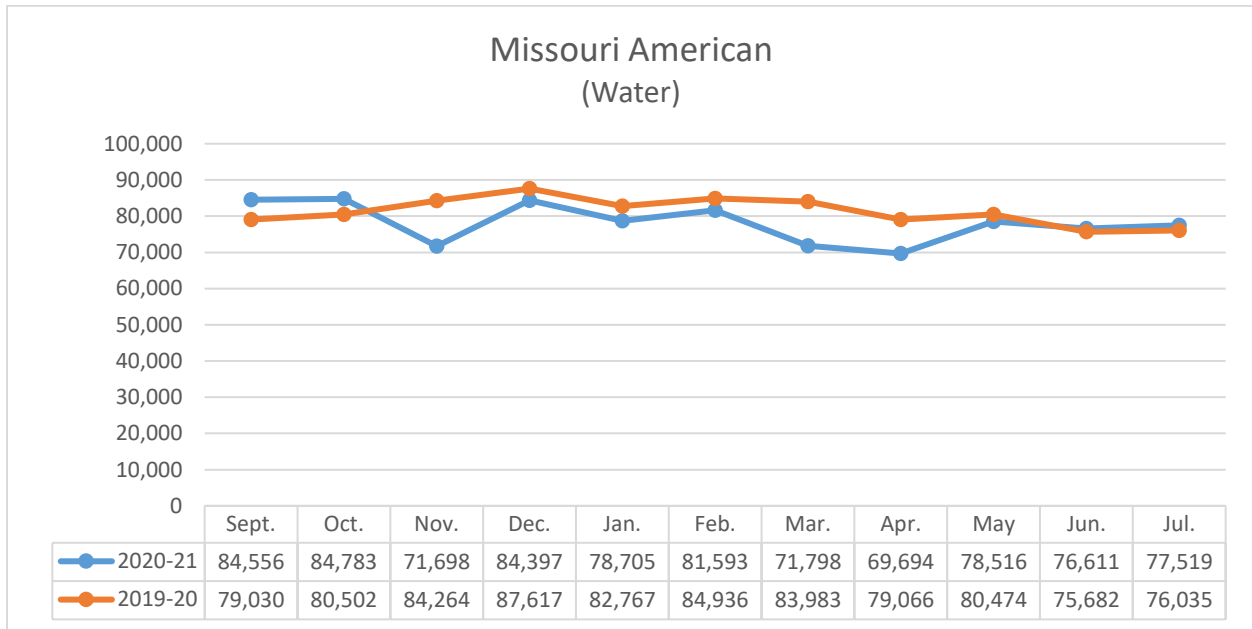
**Questions 1 & 3 (Missouri-American - Water)**

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



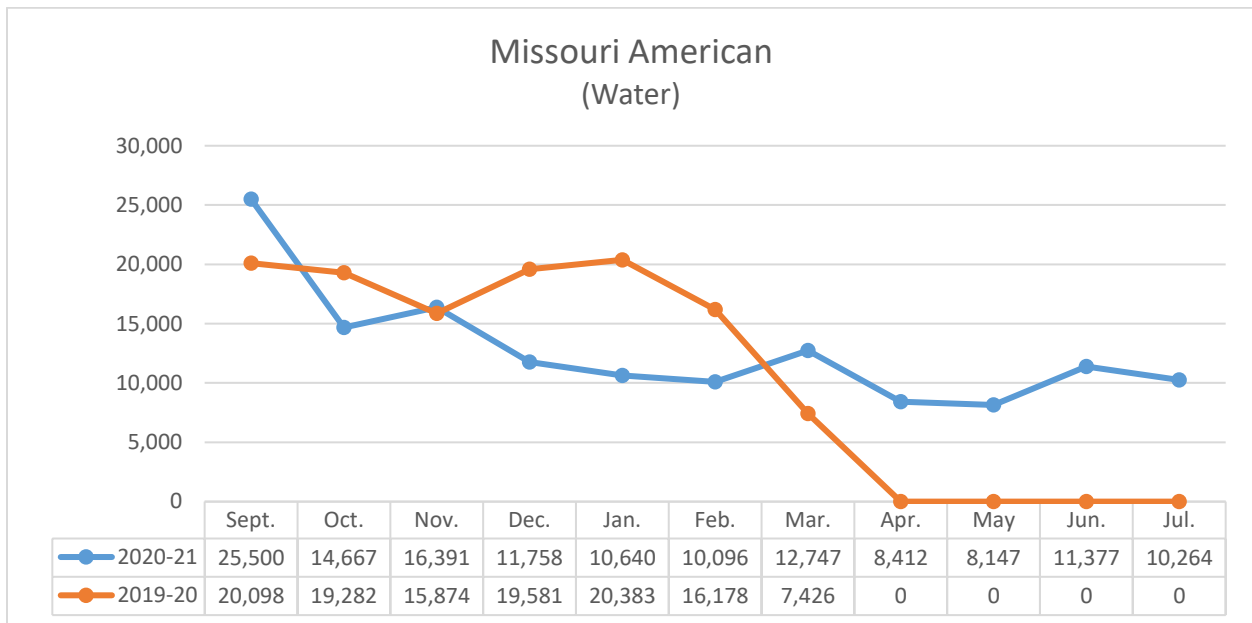
As shown in the previous graph, Missouri-American performed 1,318 disconnections for non-payment in July 2021 versus none in July 2020 and about 15% fewer in July 2021 than in June 2021. Missouri-American does not forecast the number of disconnections for non-payment.

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



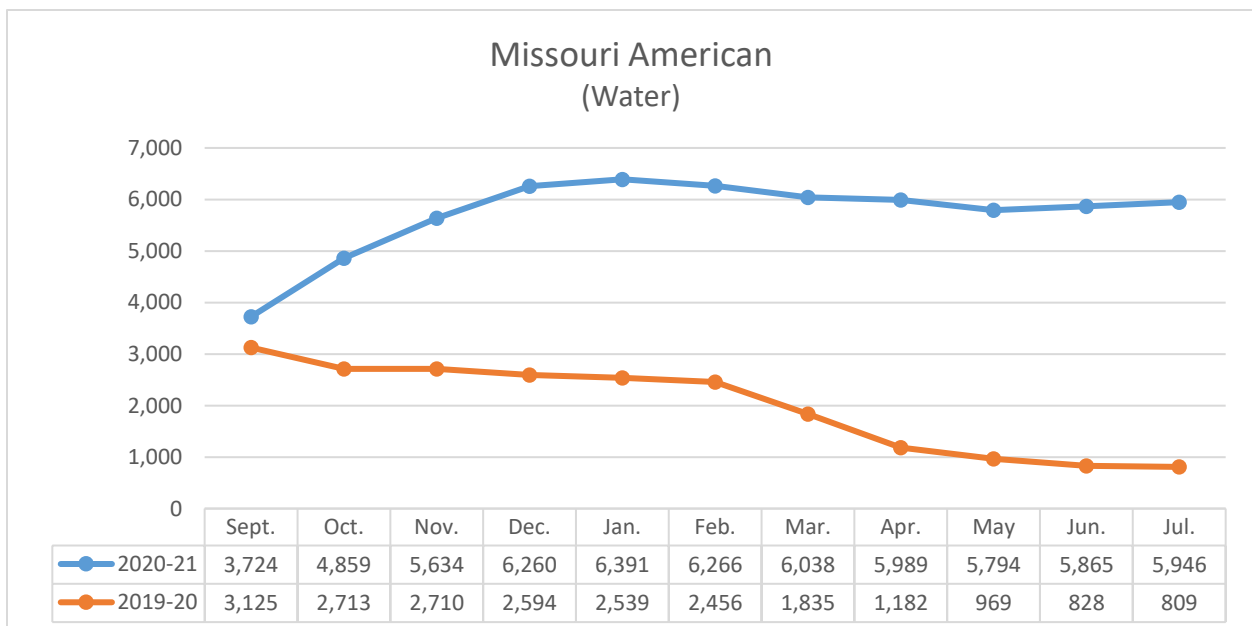
The previous data indicates that there were about 2% more Missouri-American customers with past-due accounts in July 2021 versus July 2020 and approximately 1% more in July 2021 than in June 2021. Missouri-American reported that it defines “past-due” as any unpaid amount past the due date on the customer bill.

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



As shown by Missouri-American’s data, for those customers who received a final disconnection notice there were 10,264 customers who were not disconnected in July 2021 versus none in July 2020 and approximately 10% fewer in July 2021 than in June 2021.

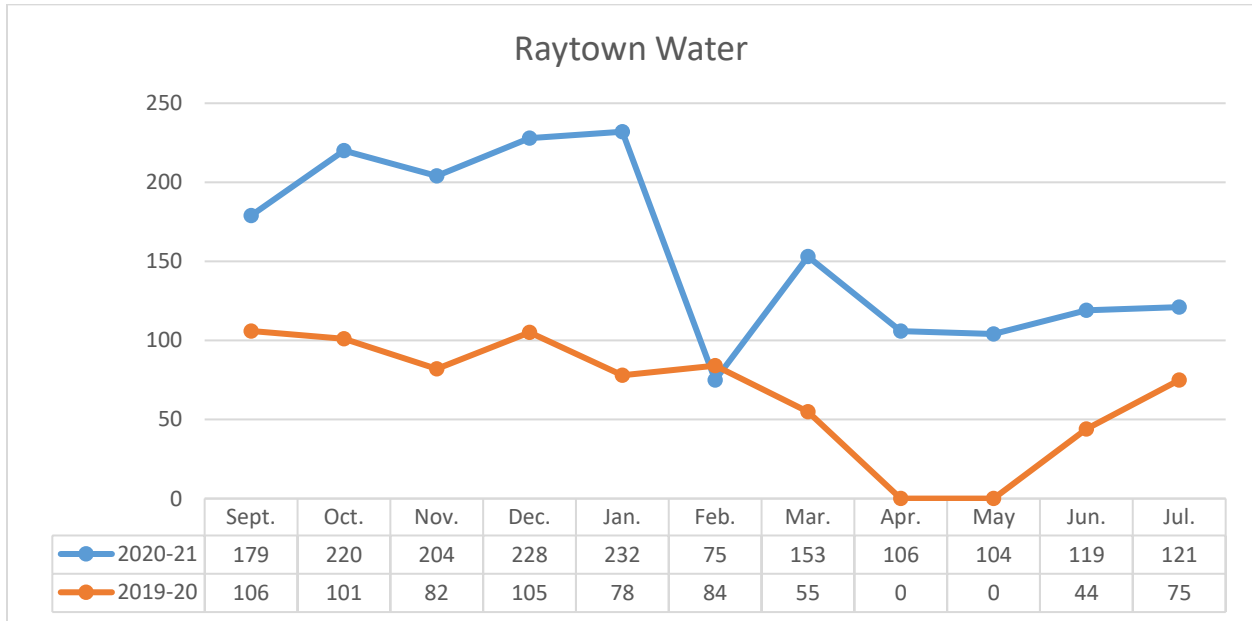
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were approximately 635% more Missouri-American customers who participated in payment plans in July 2021 versus July 2020 and about 1% more in July 2021 than in June 2021.

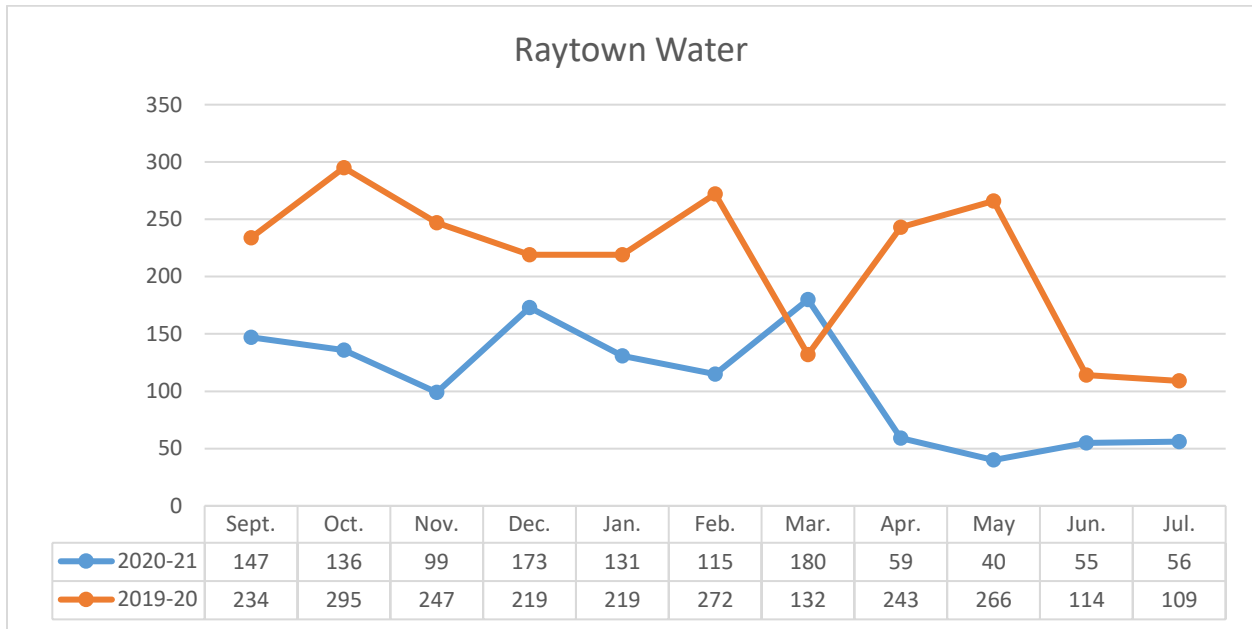
**Questions 1 & 3 (Raytown Water)**

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



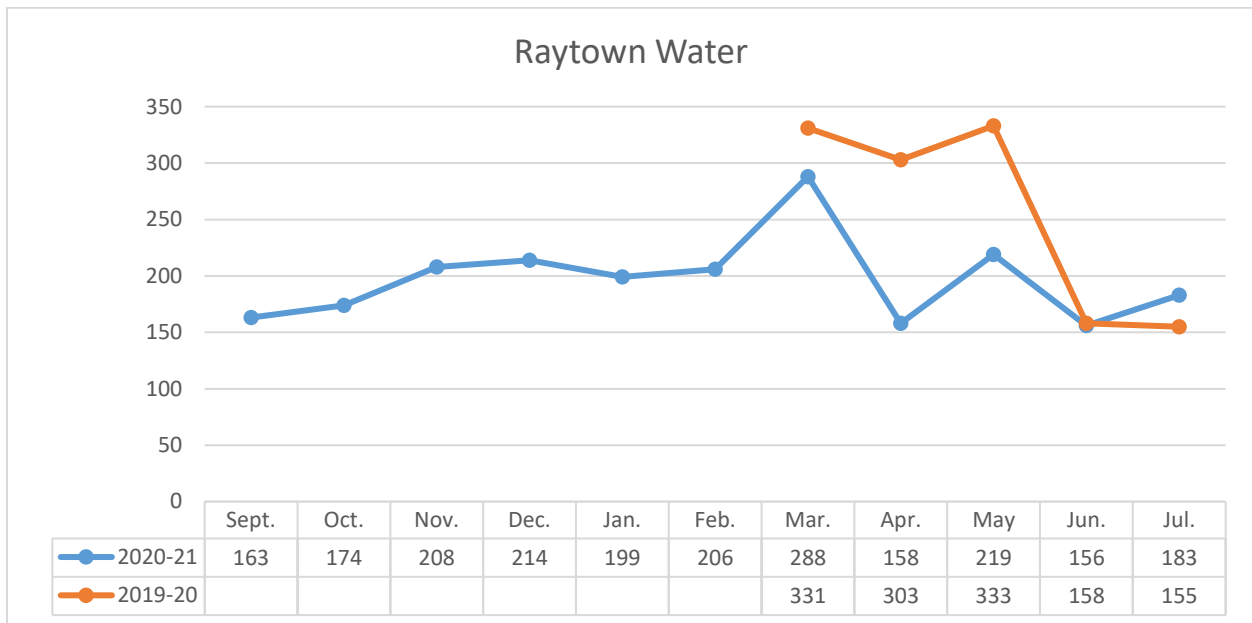
As shown in the previous graph, Raytown Water performed approximately 61% more disconnections for non-payment in July 2021 versus July 2020 and 2% more disconnections for non-payment in July 2021 versus June 2021. The number of actual disconnections by Raytown Water in June 2021 was approximately 22% fewer than the number projected by Raytown Water for the same month.

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



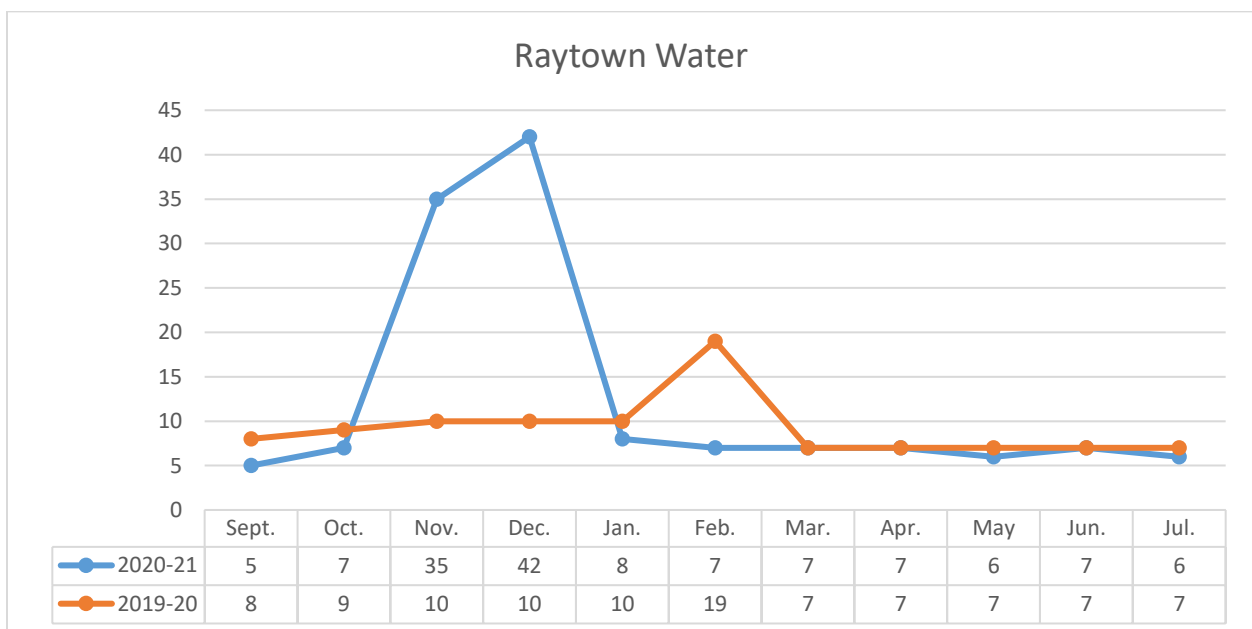
The previous data indicates that there were about 49% fewer Raytown Water customers with past-due accounts in July 2021 versus July 2020 and approximately 2% more in July 2021 than in June 2021. Raytown Water reported that it defines “past due” as accounts with balances that are over 31 days.

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



As shown by Raytown Water’s data, for those customers who received a final disconnection notice there were approximately 18% more customers who were not disconnected in July 2021 versus July 2020 and approximately 17% more in July 2021 than in June 2021.

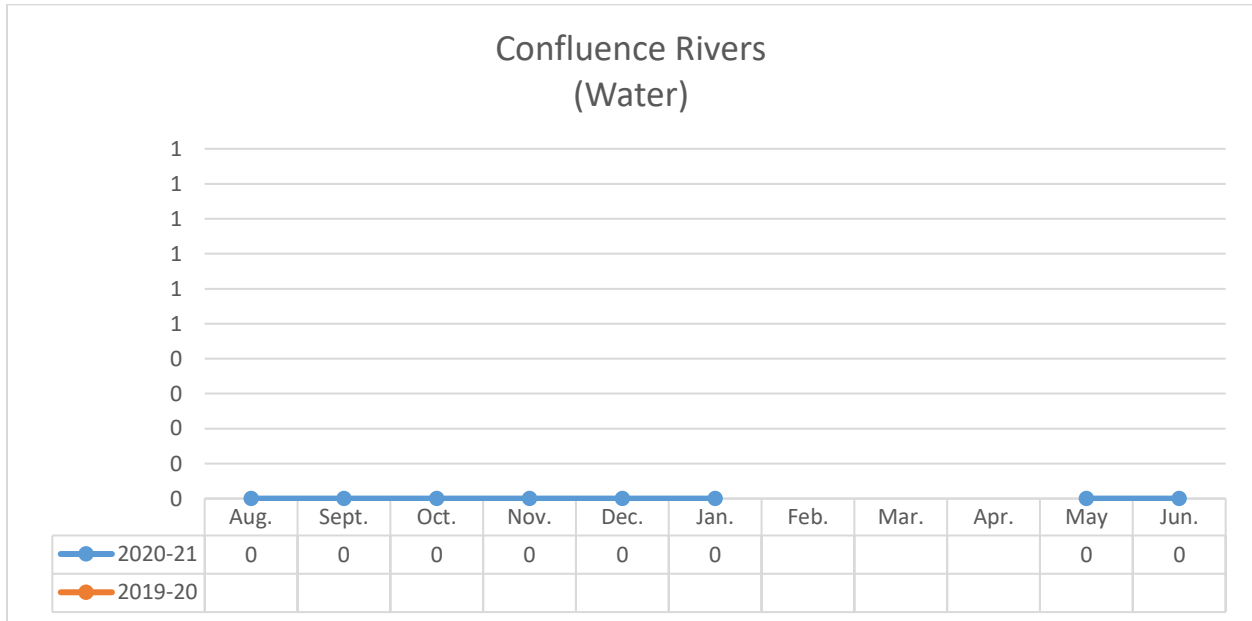
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there was one fewer customer of Raytown Water who participated in payment plans in July 2021 versus July 2020. There was also one fewer customer participating in a payment plan in July 2021 in comparison to June 2021.

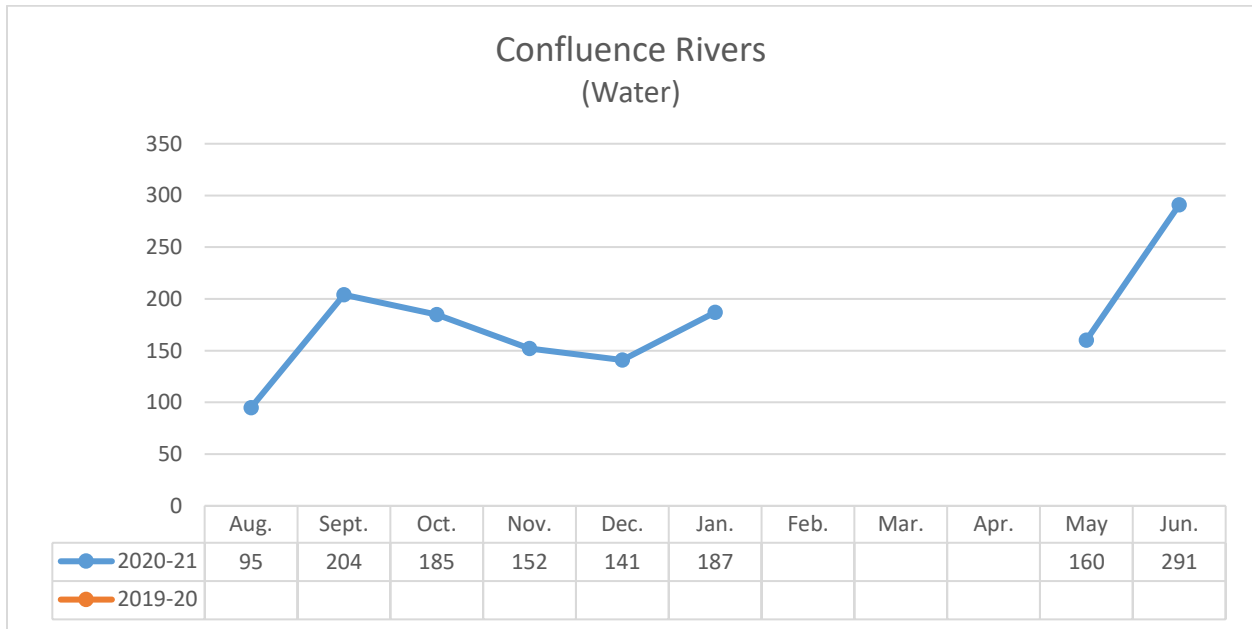
**Questions 1 & 3 (Confluence Rivers - Water)**

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



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

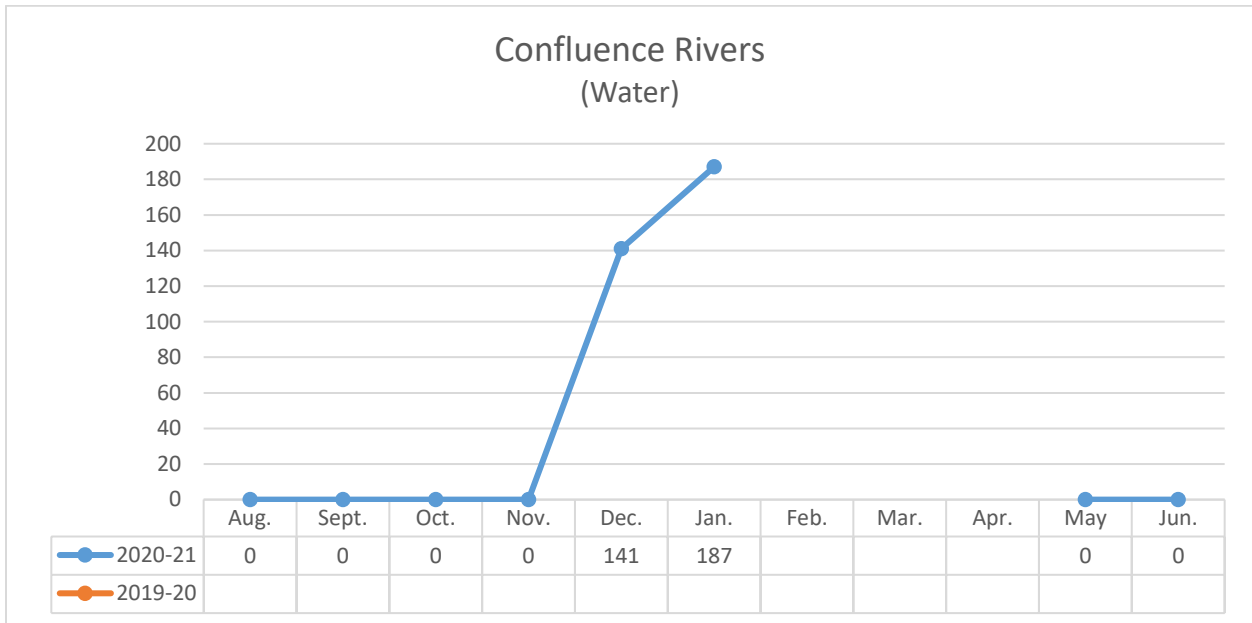
**b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”**



The previous data indicates there were about 82% fewer Confluence Rivers customers with past-due accounts in June 2021 versus May 2021. No monthly, comparative data was provided for August 2019 to June 2020, although there was a total of 37 customers with “past-due” accounts through January 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.

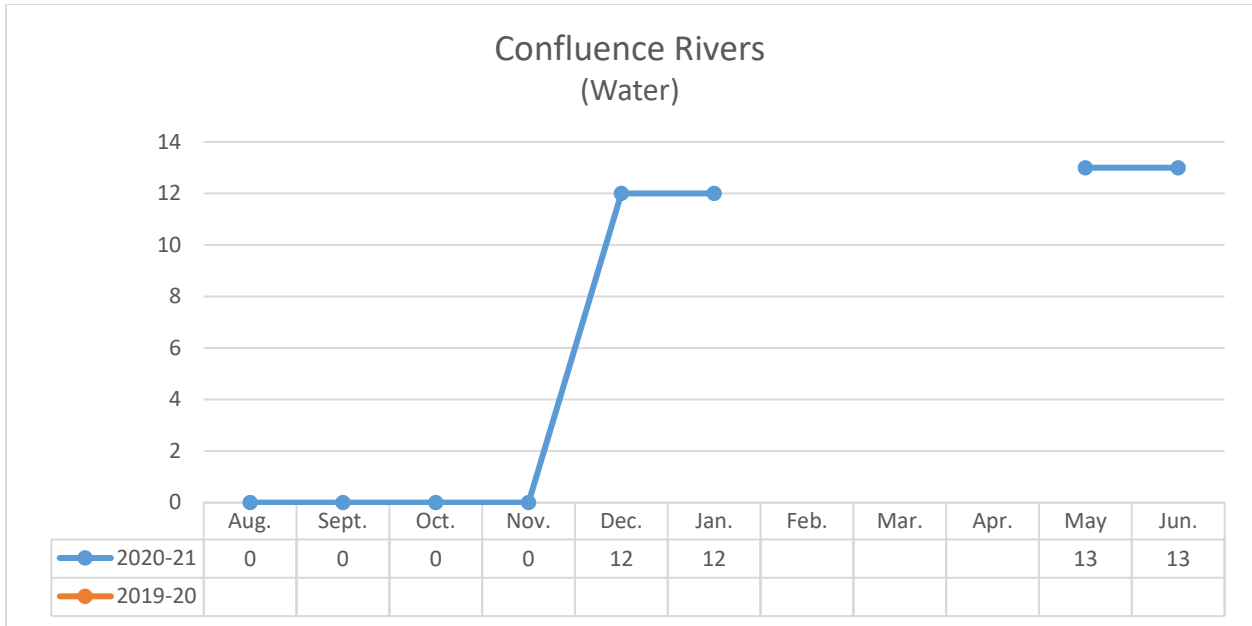


**c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end**



As shown by Confluence Rivers’ data, both in May 2021 and June 2021 there were no customers who received a final disconnection notice but were not disconnected for non-payment of service. No monthly, comparative data was provided for August 2019 to June 2020, although there were a total of 13 customers who received final disconnection notices but were not disconnected through January 2020.

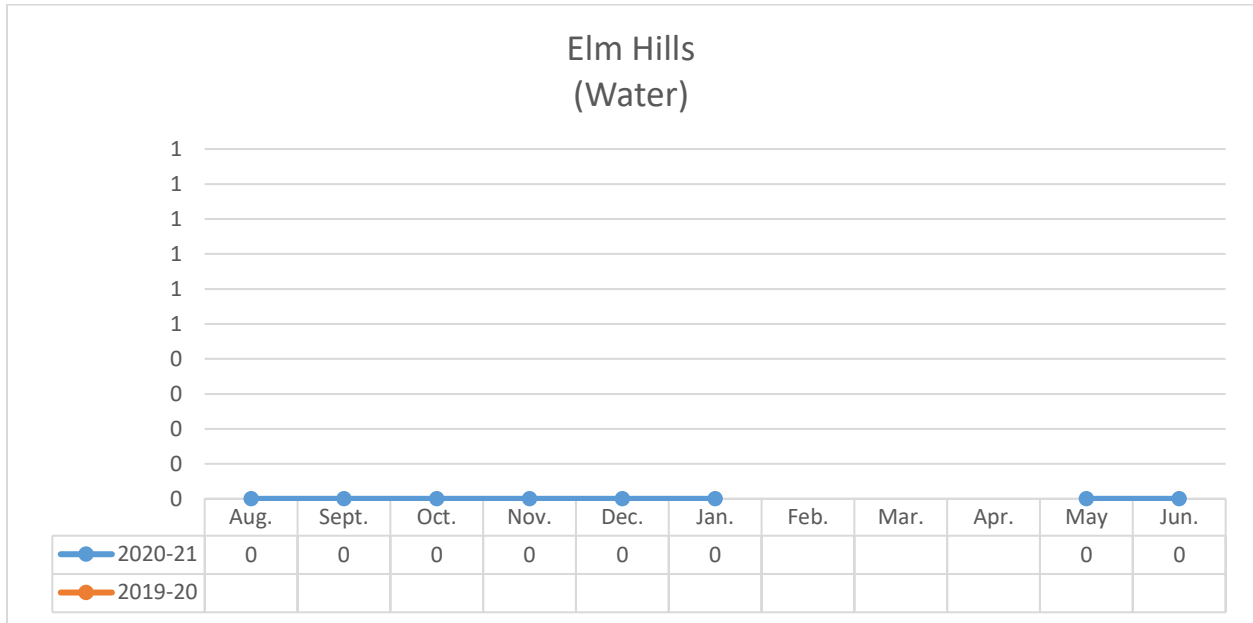
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were 13 Confluence Rivers customers who participated in payment plans in May 2021 and in June 2021. No monthly, comparative data was provided for August 2019 to June 2020, although the Company reported there were no customers who participated in payment plans through January 2020.

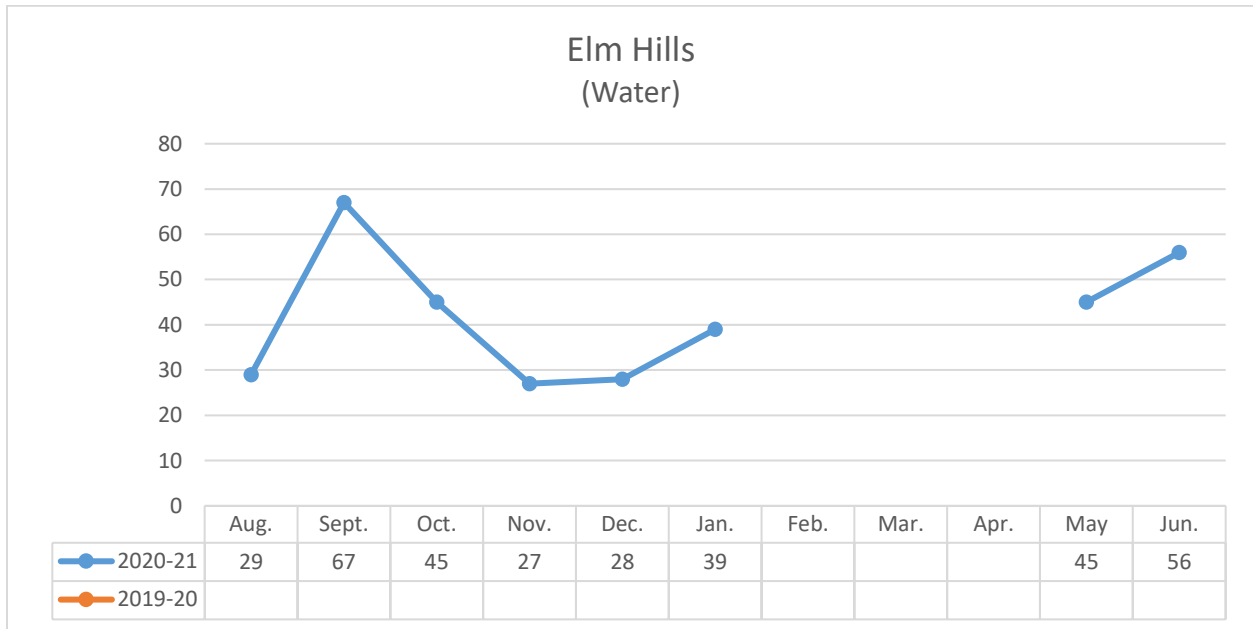
**Questions 1 & 3 (Elm Hills - Water)**

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



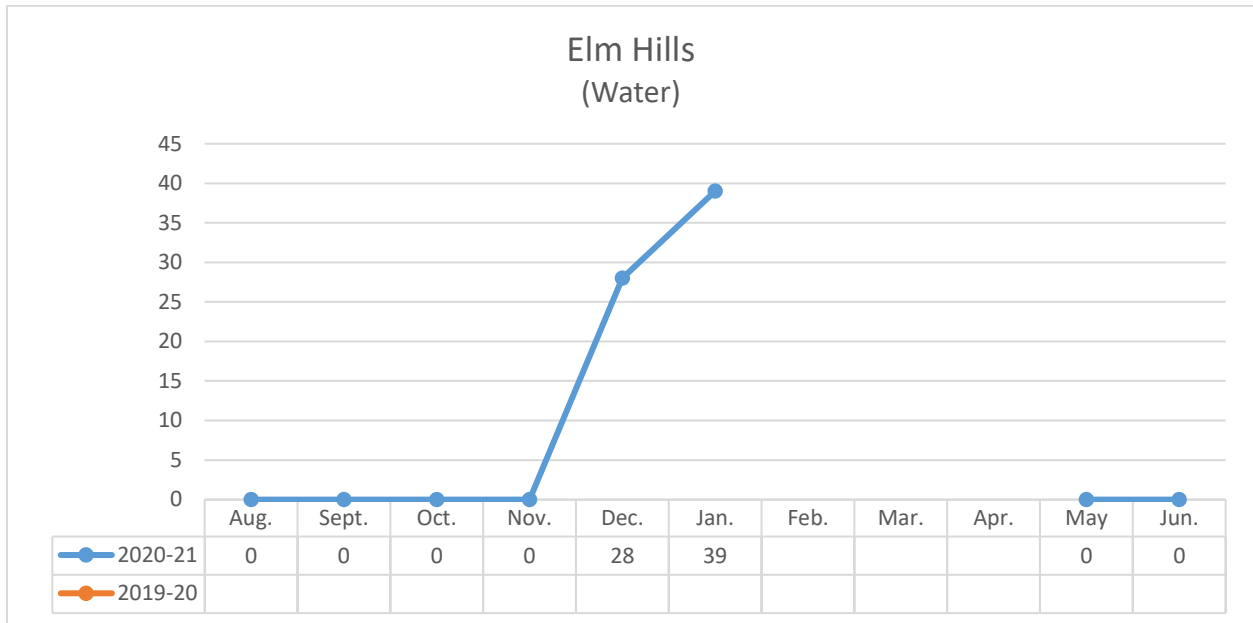
As shown in the previous graph, Elm Hills performed no disconnections in May 2021 or in June 2021. No monthly, comparative data was provided for August 2019 to June 2020, although no disconnections were performed during this time period.

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



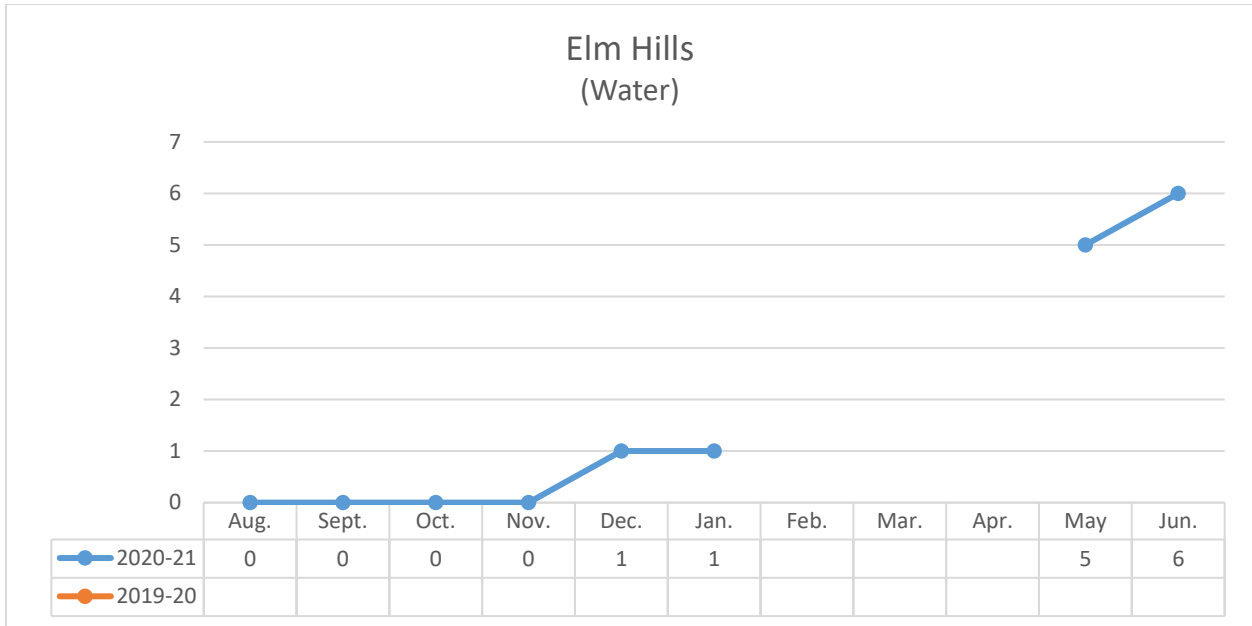
The previous data indicates there were about 24% more Elm Hills customers with past-due accounts in June 2021 versus May 2021. No monthly, comparative data was provided for August 2019 to June 2020, although there was a total of 1 customer with a “past-due” account through January 2020. Elm Hills reported 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 in May 2021 or in June 2021 but were not disconnected for non-payment of service. No monthly, comparative data was provided for August 2019 to June 2020, although there was a total of 1 customer who received final disconnection notices but was not disconnected through January 2020.

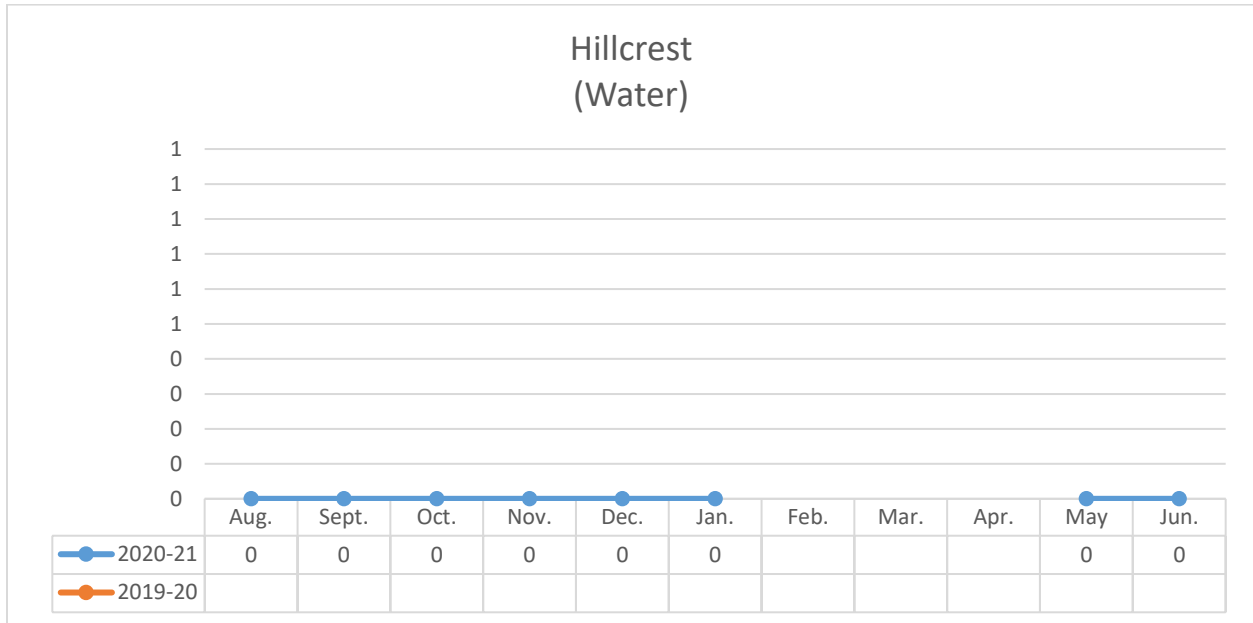
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were 6 Elm Hills customers who participated in a payment plan in June 2021. No monthly, comparative data was provided for August 2019 to June 2020. The previous graph illustrates that there were approximately 20% more Elm Hills customers who participated in payment plans in June 2021 than in May 2021.

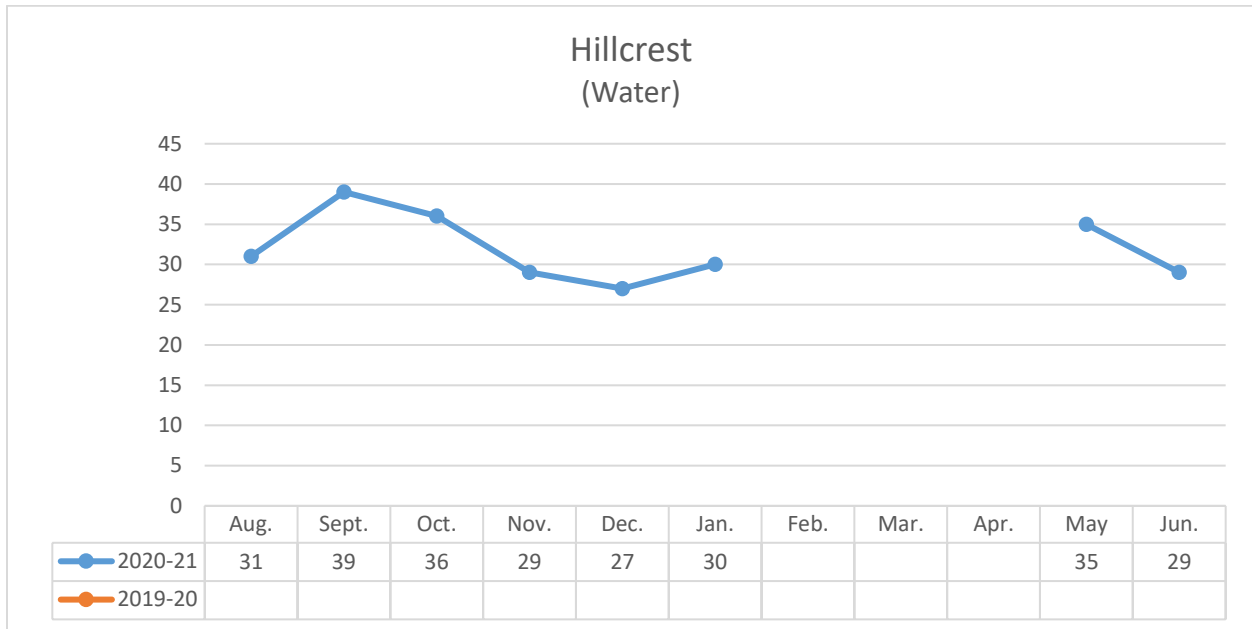
**Questions 1 & 3 (Hillcrest - Water)**

**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 May 2021 or in June 2021. No monthly, comparative data was provided for August 2019 to June 2020, although a total of 12 disconnections were performed through January 2020.

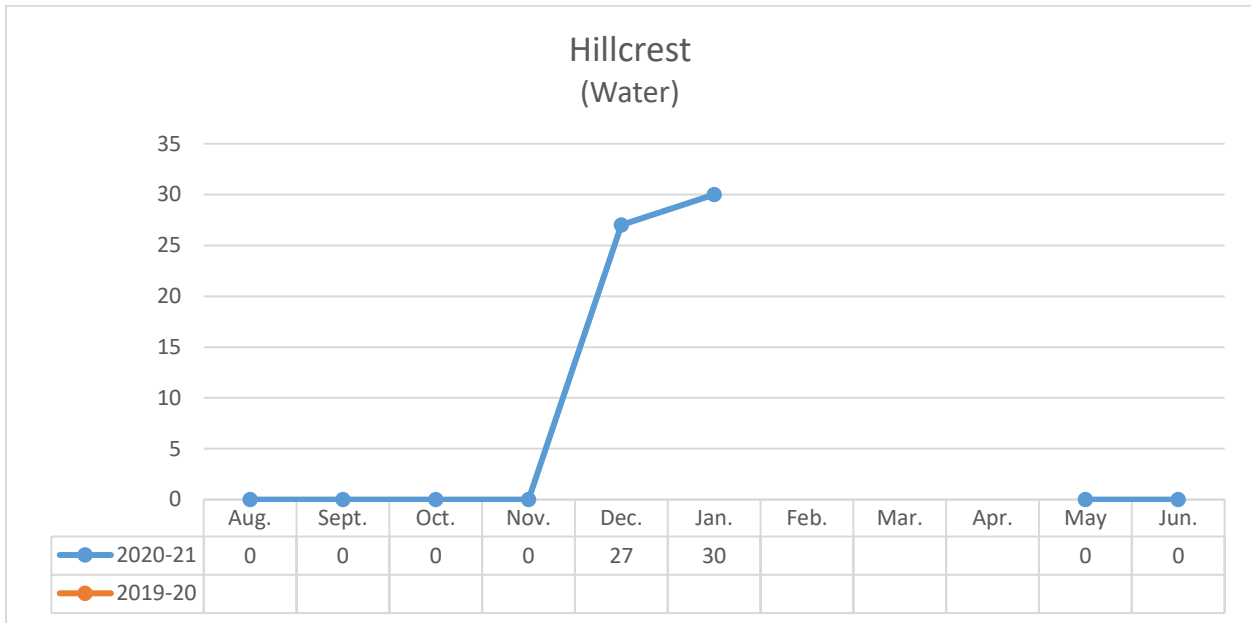
**b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”**



The previous data indicates there were about 17% fewer Hillcrest customers with past-due accounts in June 2021 versus May 2021. No monthly, comparative data was provided for August 2019 to June 2020, although there was a total of 16 customers with “past-due” accounts through January 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.

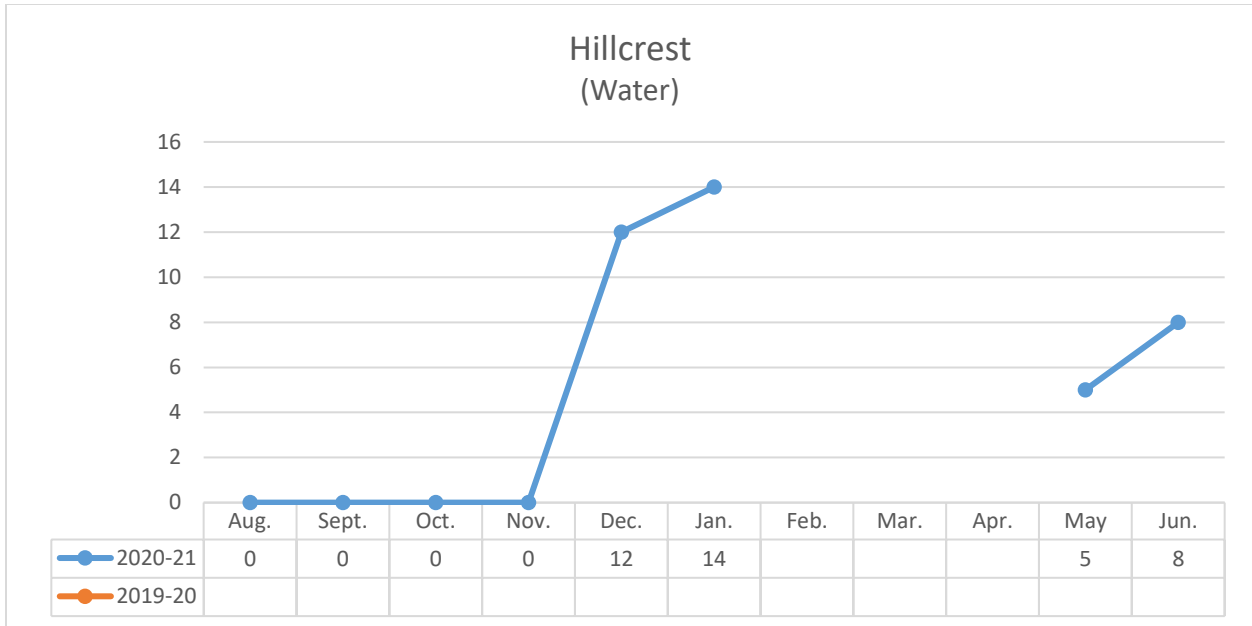


**c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end**



As shown by Hillcrest’s data, there were no customers who received a final disconnection notice in May 2021 or in June 2021. No monthly, comparative data was provided for August 2019 to June 2020, although there were a total of 4 customers through January 2020 who received final disconnection notices during this time period but were not disconnected.

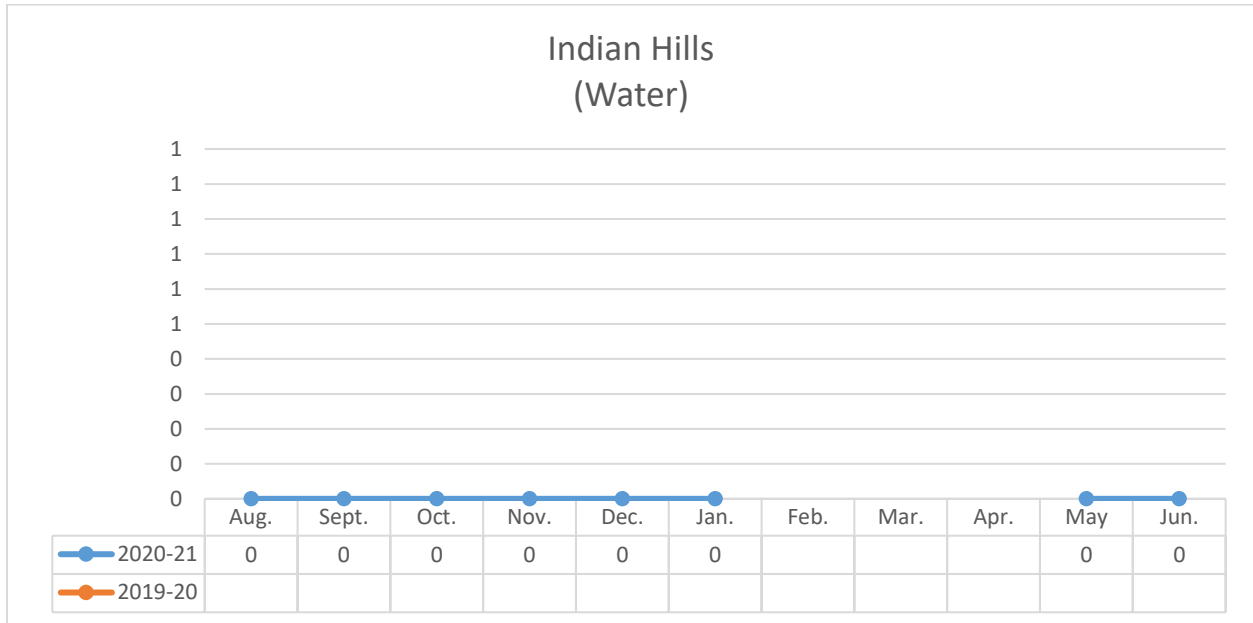
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were 8 Hillcrest customers who participated in payment plans in June 2021. No monthly, comparative data was provided for August 2019 to June 2020, although the Company reported there were no customers who participated in payment plans through January 2020. The previous graph illustrates that there were approximately 60% more Hillcrest customers who participated in payment plans in June 2021 than in May 2021.

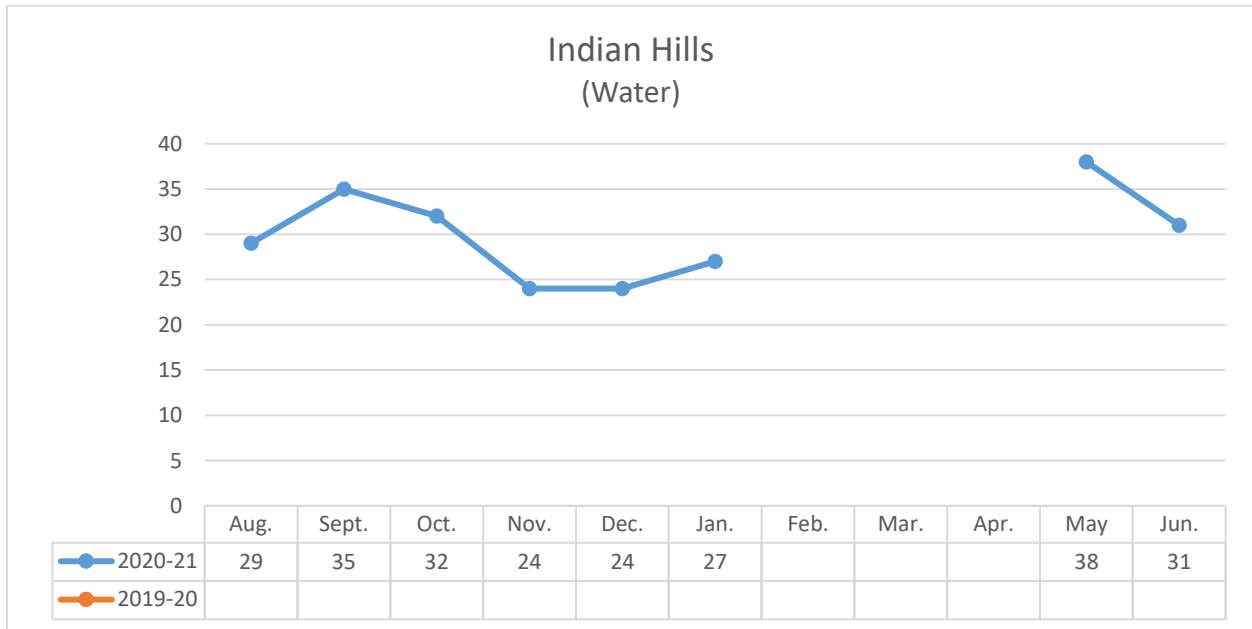
**Questions 1 & 3 (Indian Hills - Water)**

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



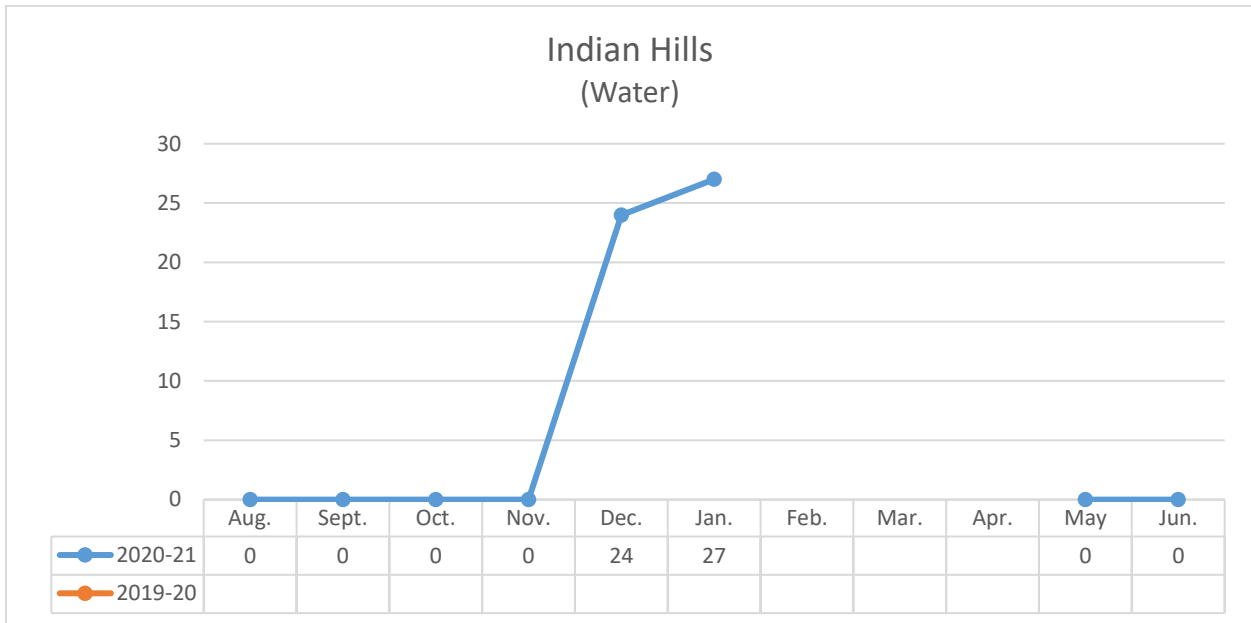
As shown in the previous graph, Indian Hills performed no disconnections in May 2021 or in June 2021. No monthly, comparative data was provided for August 2019 to June 2020, although a total of 6 disconnections were performed through January 2020.

**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”**



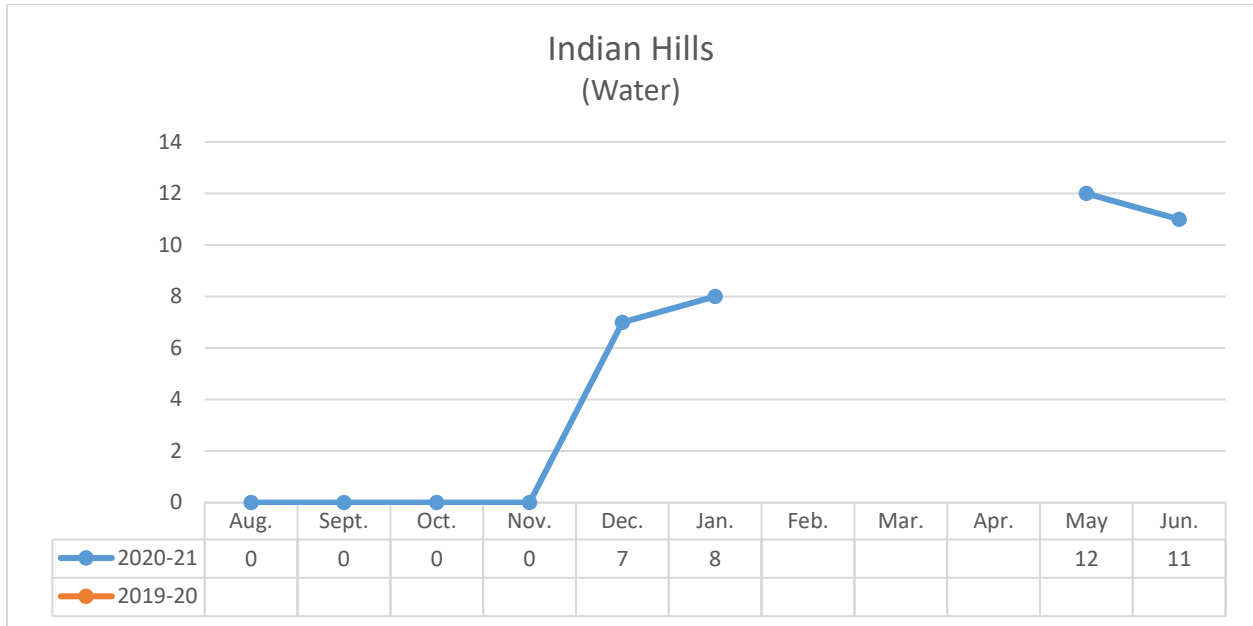
The previous data indicates there were about 18% fewer Indian Hills customers with past-due accounts in June 2021 versus May 2021. No monthly, comparative data was provided for August 2019 to June 2020, although there was a total of 11 customers with “past-due” accounts through January 2020. Indian Hills 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 no customers who received a final disconnection notice in May 2021 or in June 2021. No monthly, comparative data was provided for August 2019 to June 2020, although there were a total of 6 customers who received final disconnection notices through January 2020 but were not disconnected.

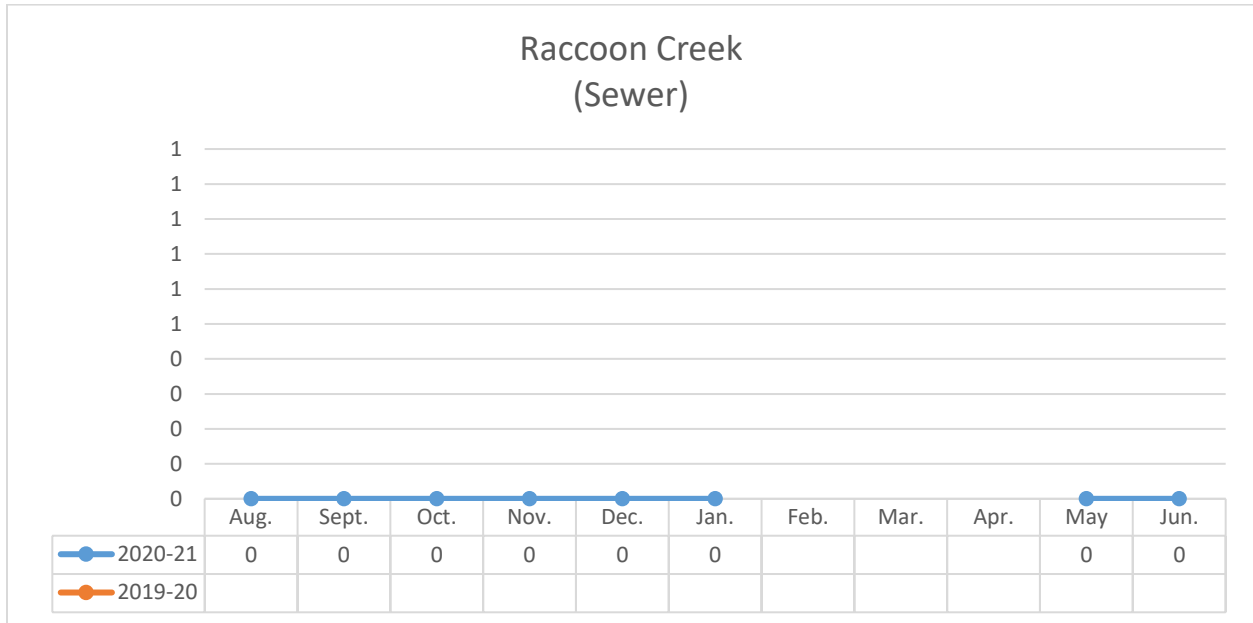
**d) The number of customers at each month-end participating in payment plans**



The previous graph illustrates that there were 11 Indian Hills customers who participated in payment plans in June 2021. No monthly, comparative data was provided for August 2019 to June 2020, although the Company reported there was a total of 11 customers who participated in payment plans through January 2020. The previous graph illustrates that there were approximately 8% fewer Indian Hills customers who participated in payment plans in June 2021 than in May 2021.

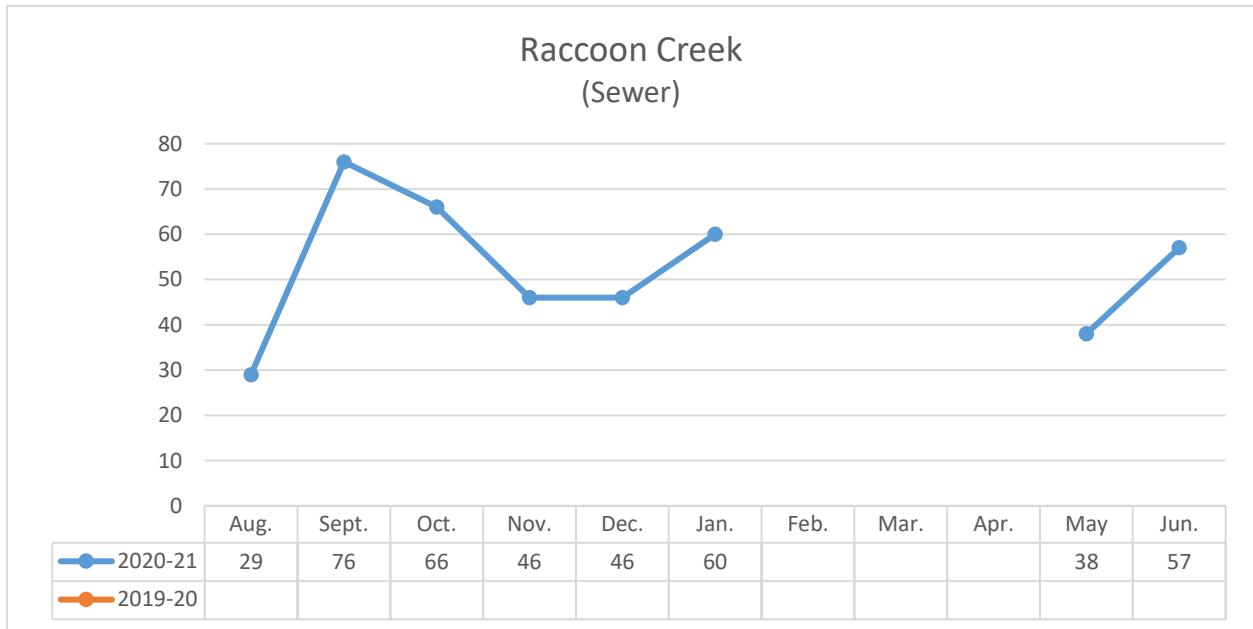
**Questions 1 & 3 (Raccoon Creek - Sewer)**

**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 May 2021 or in June 2021. No monthly, comparative data was provided for August 2019 to June 2020, although a total of 1 disconnection was performed through January 2020.

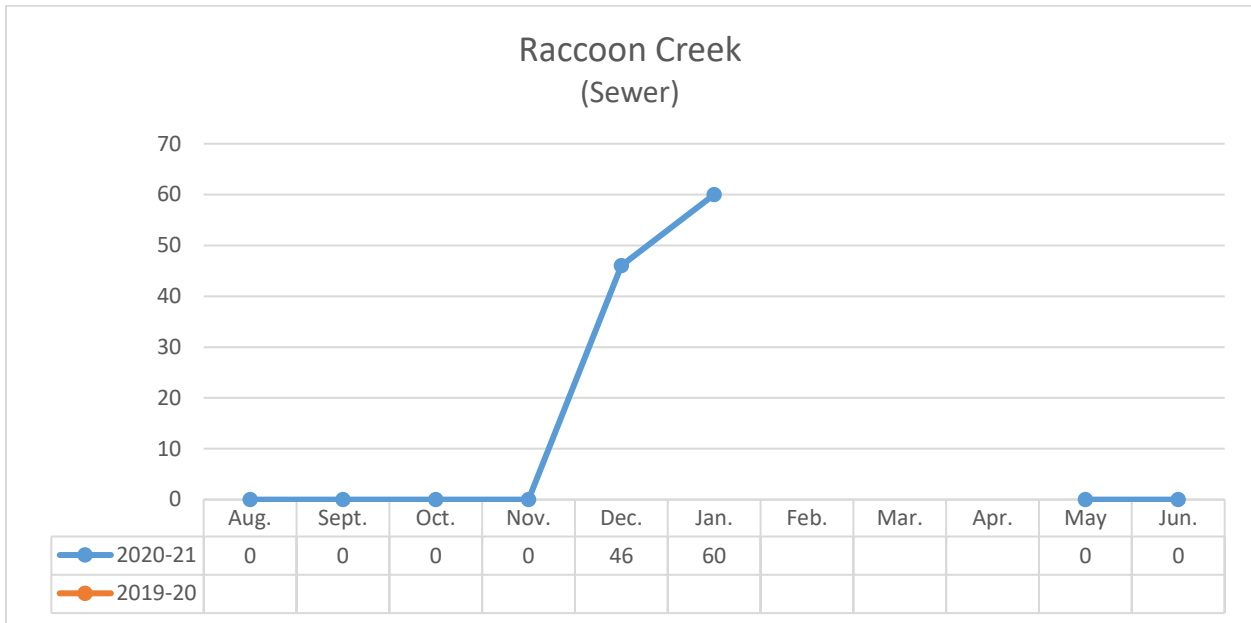
**b) The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define “past-due”**



The previous data indicates there were about 50% more Raccoon Creek customers with past-due accounts in June 2021 versus May 2021. No monthly, comparative data was provided for August 2019 to June 2020, although there were a total of 3 customers with “past-due” accounts through January 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.

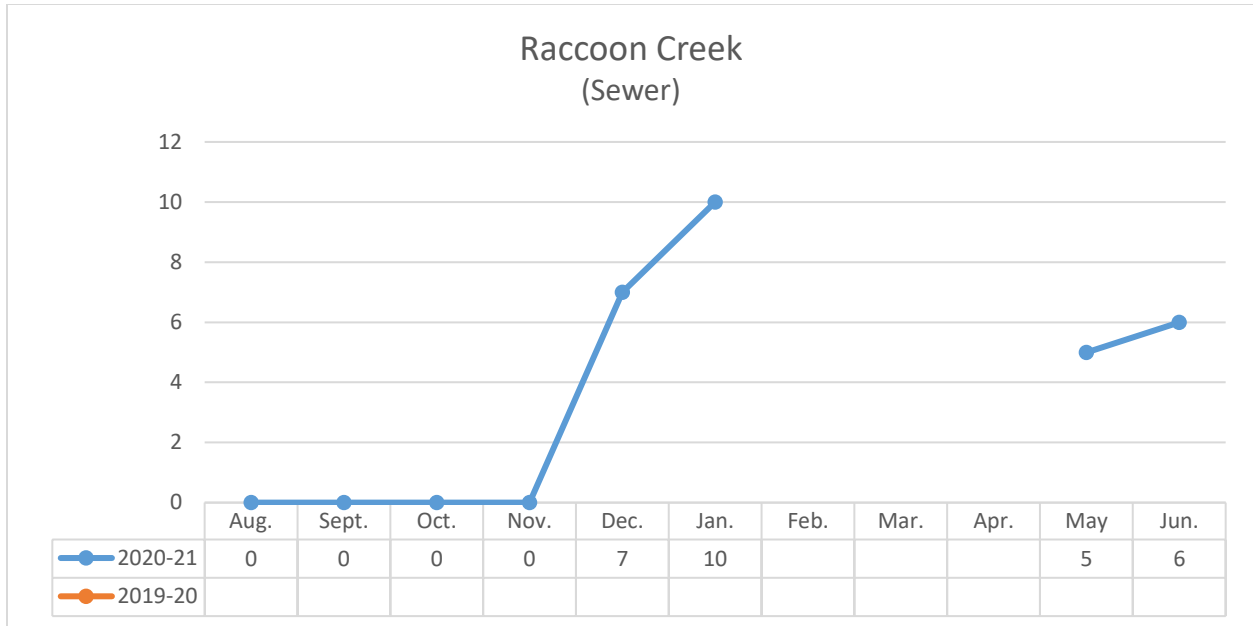


**c) The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end**



As shown by Raccoon Creek’s data, there were no customers who received a final disconnection notice in May 2021 or in June 2021. No monthly, comparative data was provided for August 2019 to June 2020, although there was a total of 2 customers who received final disconnection notices through January 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 6 Raccoon Creek customers who participated in payment plans in June 2021. No monthly, comparative data was provided for August 2019 to June 2020, although the Company reported there were no customers who participated in payment plans through January 2020. The previous graph illustrates that there were approximately 20% more Raccoon Creek customers who participated in payment plans in June 2021 than in May 2021.

**Question 2**

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

**Ameren Missouri (Electric)**

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

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

**Empire (Electric)**

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

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

**Evergy Metro (Electric)**

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

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

**Evergy West (Electric)**

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

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

**Ameren Missouri (Gas)**

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

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

**Spire (Gas)**

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

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

**Summit (Gas)**

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

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

**Empire (Gas)**

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

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

**Liberty (MNG) (Gas)**

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

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

**Liberty (Water)**

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

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

**Missouri-American (Water)**

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

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

**Raytown Water (Water)**

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

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

**Confluence Rivers (Water)**

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

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

**Elm Hills (Water)**

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

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

**Hillcrest (Water)**

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

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

**Indian Hills (Water)**

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

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

**Raccoon Creek (Sewer)**

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

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