

**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. Five of the seventeen utilities ordered by the Commission to provide responses for this report failed to reply to Staff’s initial DRs by updating its information for August 2021 in a timely manner for inclusion in this report. Those entities are:

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

9. One of the seventeen utilities, Raytown Water Company, did not respond to the additional DR submitted by staff on August 26, 2021.

10. Per the Commission's August 11, 2021 Order, Staff began adding a baseline in this update 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

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 22nd day of September, 2021.

/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

September 22, 2021

Appendix A

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FOR RECOVERY OF PAST-DUE UTILITY CUSTOMER PAYMENTS
AFTER THE COVID-19 PANDEMIC EMERGENCY

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Staff Report on Utility Data Request Responses in

File No. AW-2020-0356

On August 19, 2020, the Missouri Public Service Commission (“Commission” or “PSC”) issued its *Order Directing Staff to Gather Information about Utility Disconnections*. In its Order, the Commission directed Staff to gather information from the state’s utilities regarding current levels of disconnections for non-payment, anticipated levels of such disconnections by those utilities in the next six months, number of customers with past-due accounts, number of customers that have received a final disconnection notice, and number of customers participating in payment plans. The Staff was then directed to file a report to share its findings no later than September 21, 2020. The Commission also directed the Staff to file monthly updates to the report on the 15th day of each following month.¹ This report represents the thirteenth such update, incorporating information through the end of August 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 graphs presented below. Staff also issued updated data requests for Question 2) covering the period of September 2021 through February 2022 to the utilities.

For purposes of this updated report, the following utilities responded to this Staff data request with month-end August 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 and August 2021 data in sufficient time for inclusion in this update: 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. These companies did respond to the updated data request for question 2.

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 (blue dots and line). As this report is updated in the future, the blue dots and line representing post-July 2021 data will extend through future months. This method of presentation will allow for a direct comparison of the reported information from August 2020 to August 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 August 2021 compared to July 2021). It will also compare the percentage change for each category of information for the current month versus the same month in 2019.

Summary of Responses to Questions 1 and 3

Regarding Question 1a and 3a, most of the individual utilities reported increases in the number of customer disconnections for August 2021 compared to the previous month, July 2021. Conversely, most of the utilities reported decreases in the number of disconnections between the months of August 2020 and August 2021. Approximately equal numbers of utilities reported increases and decreases in this metric for August 2021 compared to the pre-pandemic level of disconnections in August 2019.

For Question 1b and 3b, almost all of the responding utilities reported decreases in the number of past-due customer accounts in August 2021 compared to July 2021. Most utilities also reported decreases in the number of past-due customers for August 2021 compared to July 2020. Likewise, most utilities reported decreases in this metric for August 2021 compared to the pre-pandemic level in August 2019.

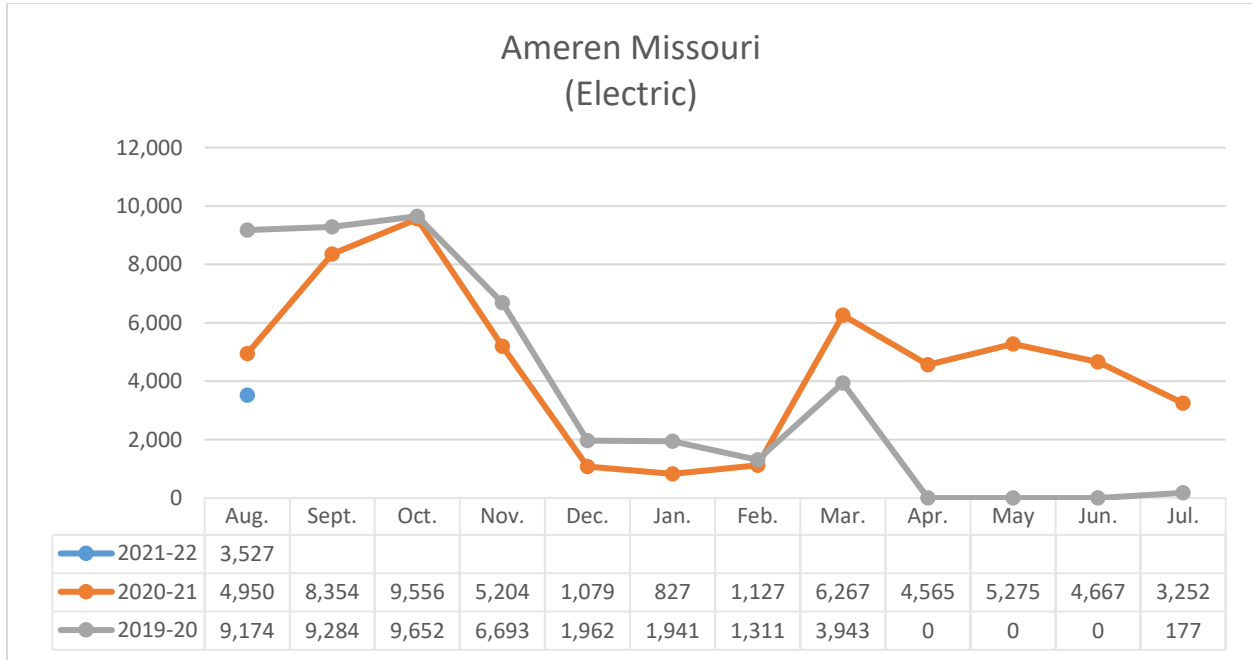
For Question 1c and 3c, in August 2021, approximately equal numbers of utilities reported increases and decreases in the number of customers who have received final disconnection notices, but have not yet been disconnected, compared to July 2021. Most utilities reported decreases for this metric between August 2021 and August 2020. Most of the utilities also reported decreases in this metric from August 2021 to the pre-pandemic level in August 2019.

Regarding Question 1d and 3d, most of the utilities reported decreases in the number of customers participating in payment plans in August 2021 compared to July 2021. Most utilities also reported decreases in this metric for August 2021 compared to August 2020. Finally, most utilities reported increases in the number of customers enrolled in payment plans in August 2021 compared to the pre-pandemic level in August 2019, with a majority of the increases being quite large.

Individual Utility Responses:

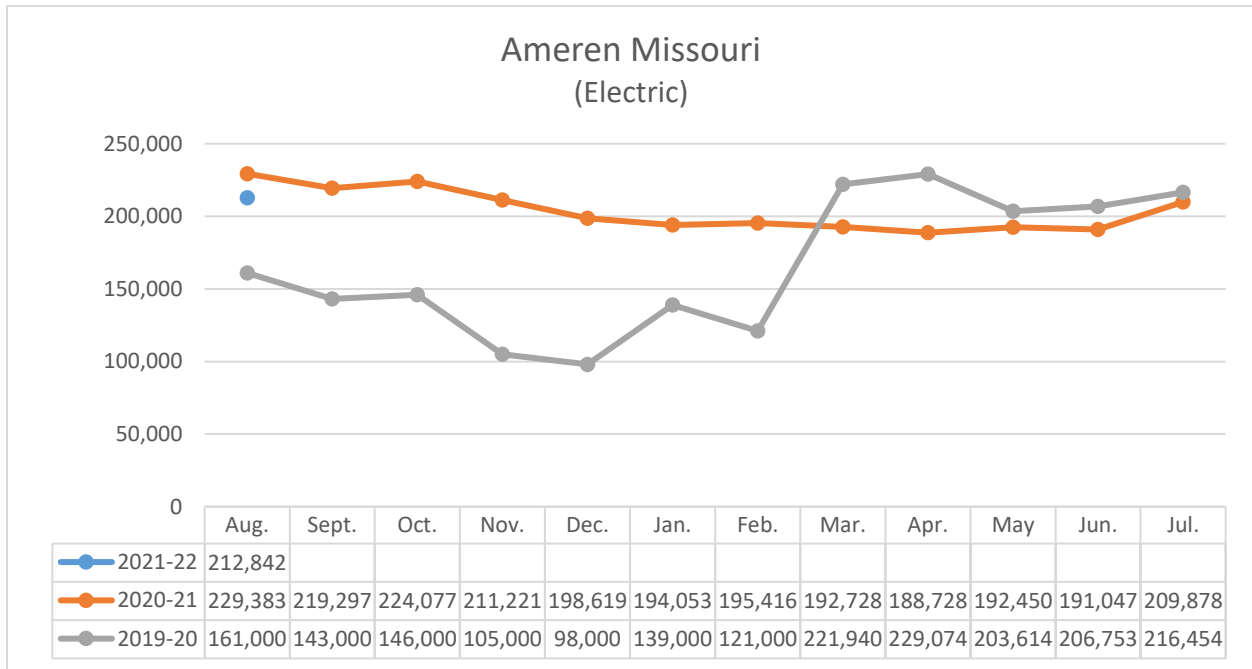
Questions 1 & 3 (Ameren Missouri – Electric)

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



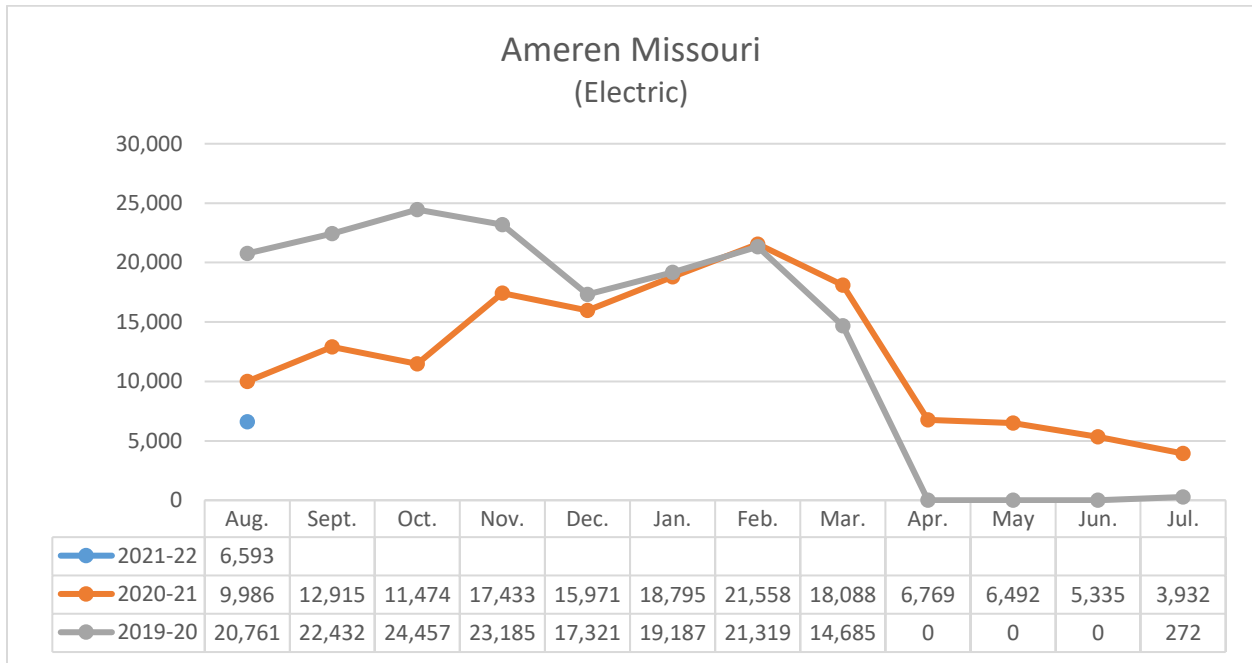
As shown in the previous graph, Ameren Missouri had 29% fewer disconnections for non-payment in August 2021 versus in August 2020 and about 8% more in August 2021 than in July 2021. The number of actual disconnections by Ameren Missouri in August 2021 was 36% below the amount projected by Ameren Missouri for the same month. There were 62% fewer disconnections for non-payment in August 2021 versus pre-pandemic, August 2019.

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



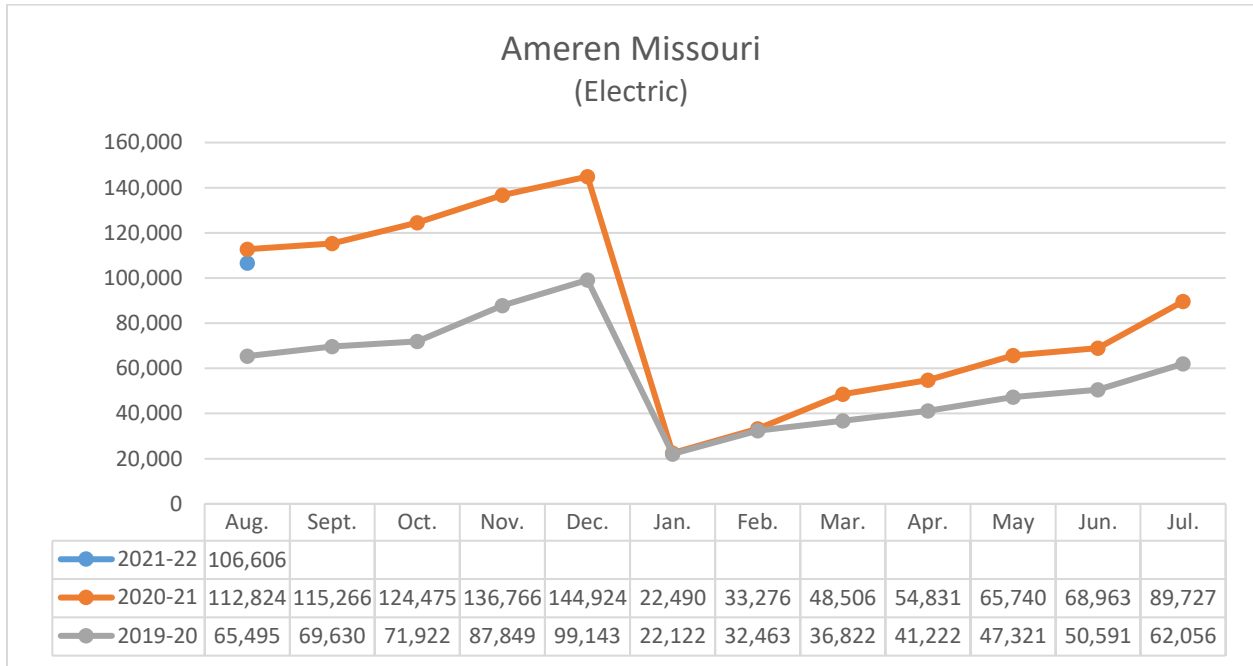
The previous data indicates that there were approximately 7% fewer Ameren Missouri customers with past-due accounts in August 2021 versus August 2020 and approximately 1% more in August 2021 than in July 2021. There were 32% more customers with past-due accounts in August 2021 versus pre-pandemic, August 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 34% fewer customers who were not disconnected in August 2021 versus in August 2020 and approximately 68% more in August 2021 than in July 2021. There were 68% fewer customers who received a final disconnection notice, but have not been disconnected for non-payment in August 2021 versus pre-pandemic, August 2019.

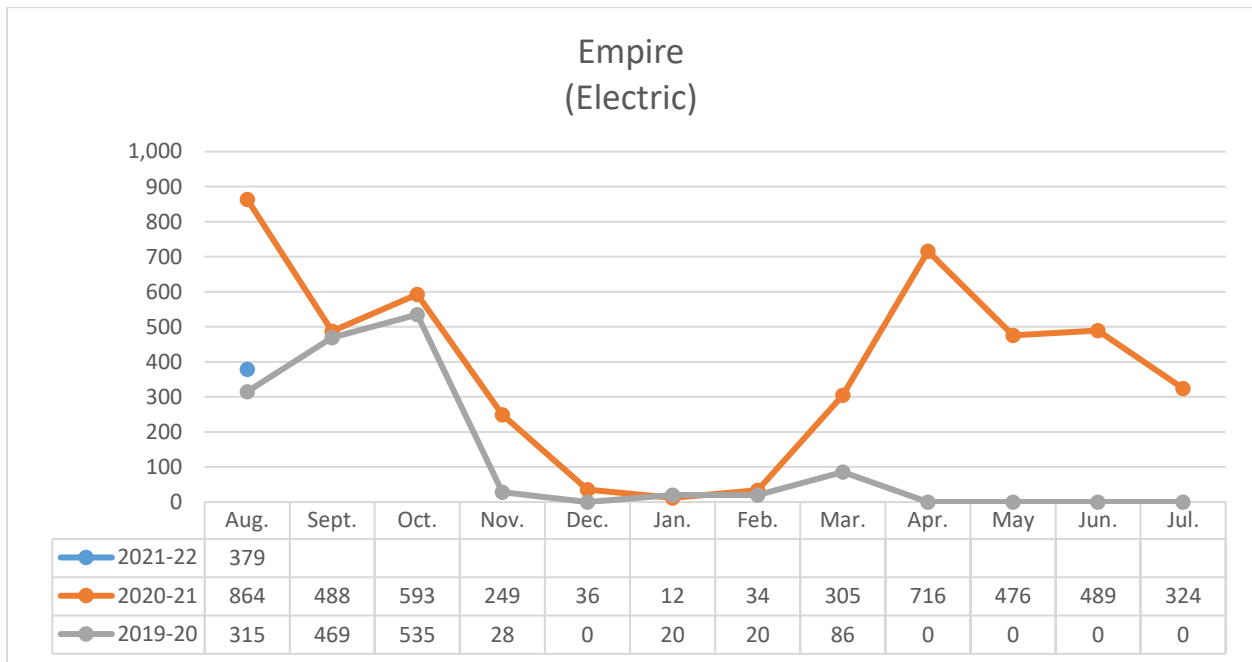
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 6% fewer Ameren Missouri customers who participated in payment plans in August 2021 versus August 2020 and about 19% more in August 2021 than in July 2021. There were 63% more customers who participated in payment plans in August 2021 versus pre-pandemic, August 2019.

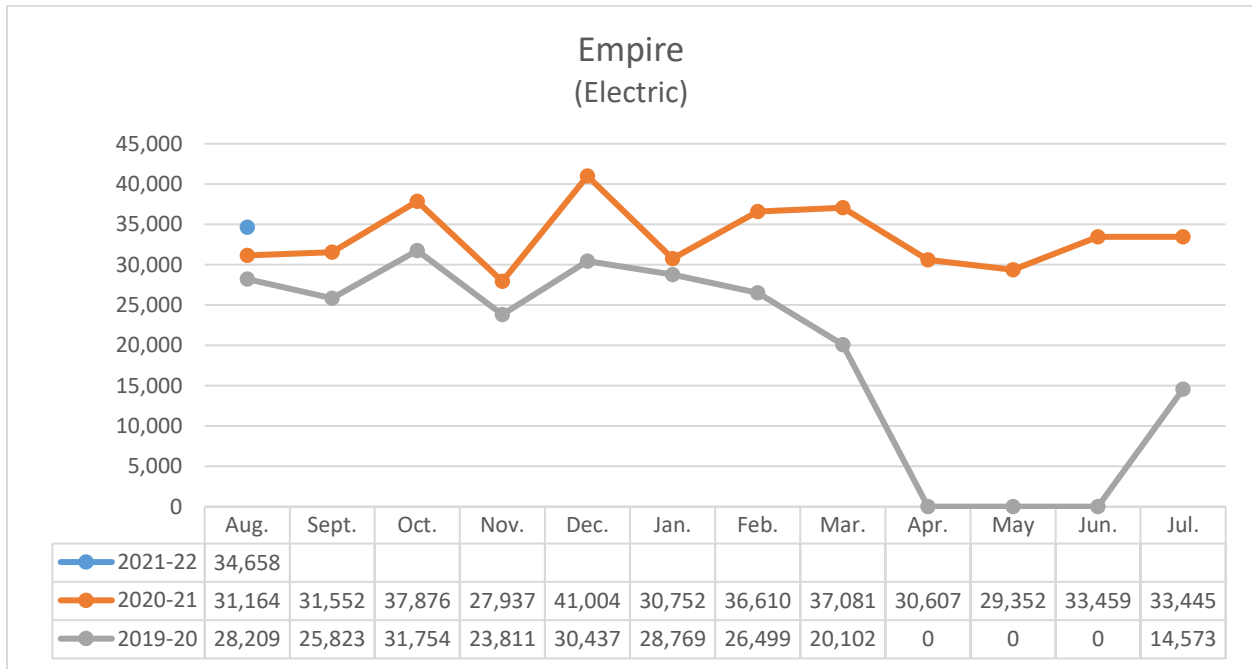
Questions 1 & 3 (Empire – Electric)

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



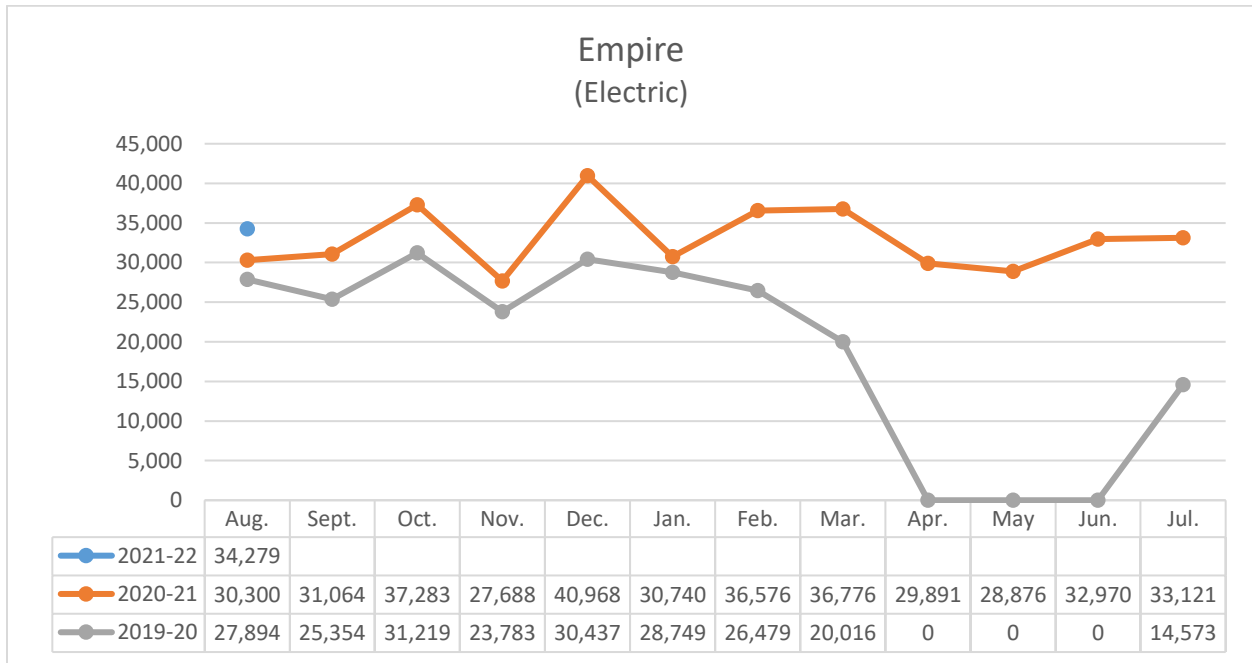
As shown in the previous graph, Empire performed 56% fewer disconnections for non-payment in August 2021 versus in August 2020 and about 17% more in August 2021 than in July 2021. The number of actual disconnections by Empire in August 2021 was 76% below the amount projected by Empire for the same month. There were 20% more disconnections for non-payment of services in August 2021 versus pre-pandemic, August 2019.

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



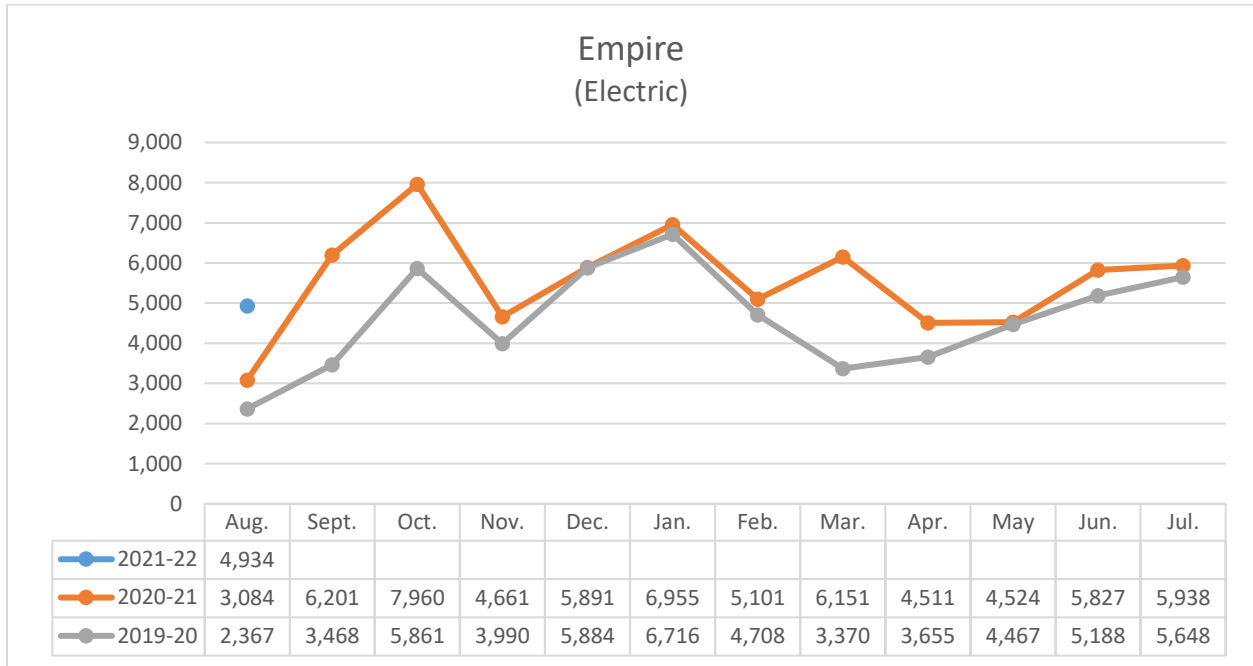
The previous data indicates that there were 11% more Empire customers with past-due accounts in August 2021 versus August 2020 and 4% more customers with past-due accounts in August 2021 compared to July 2021. There were 23% more customers with past-due accounts in August 2021 versus pre-pandemic, August 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 13% more customers who were not disconnected in August 2021 versus August 2020 and approximately 3% more in August 2021 than in July 2021. There were 23% more customers who received a final disconnection notice, but have not been disconnected in August 2021 versus pre-pandemic, August 2019.

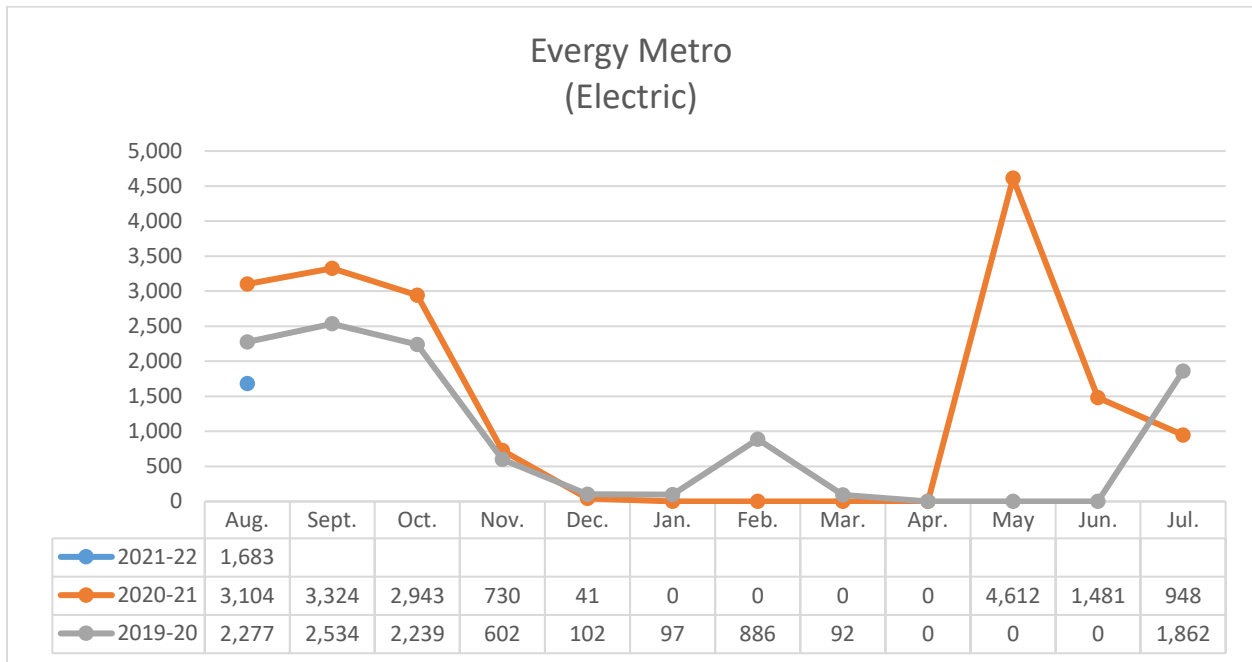
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 60% more Empire customers who participated in payment plans in August 2021 versus August 2020 and about 17% fewer in August 2021 than in July 2021. There were 108% more customers participating in payment plans in August 2021 versus pre-pandemic, August 2019.

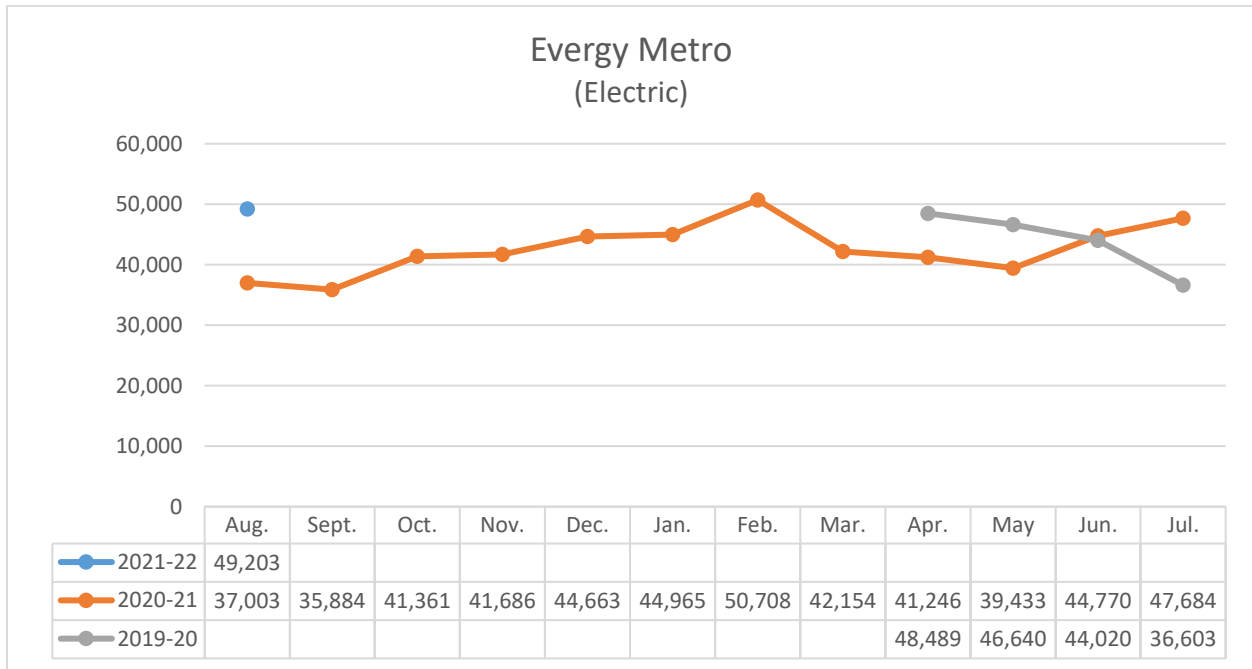
Questions 1 & 3 (Evergy Metro – Electric)

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



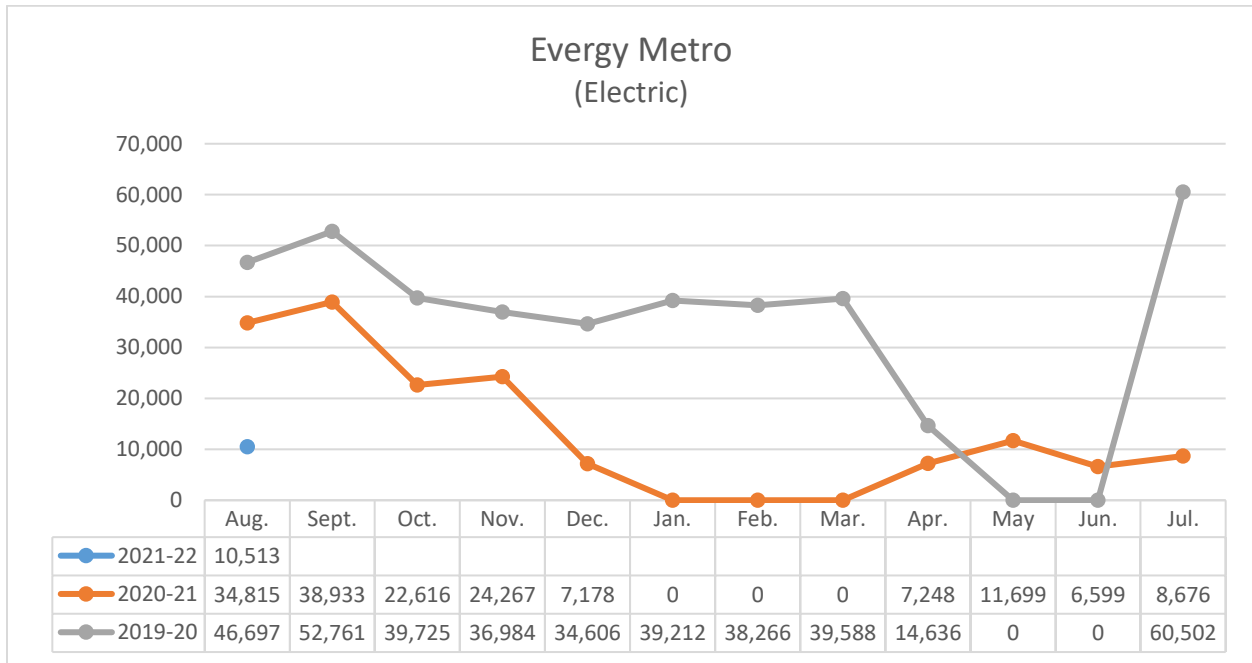
As shown in the previous graph, Evergy Metro performed 46% fewer disconnections for non-payment in August 2021 versus August 2020 and about 78% more in August 2021 than in July 2021. The number of actual disconnections by Evergy Metro in August 2021 was about 49% below the amount projected by Evergy Metro for the same month. There were 26% fewer disconnections for non-payment in August 2021 versus pre-pandemic, August 2019.

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



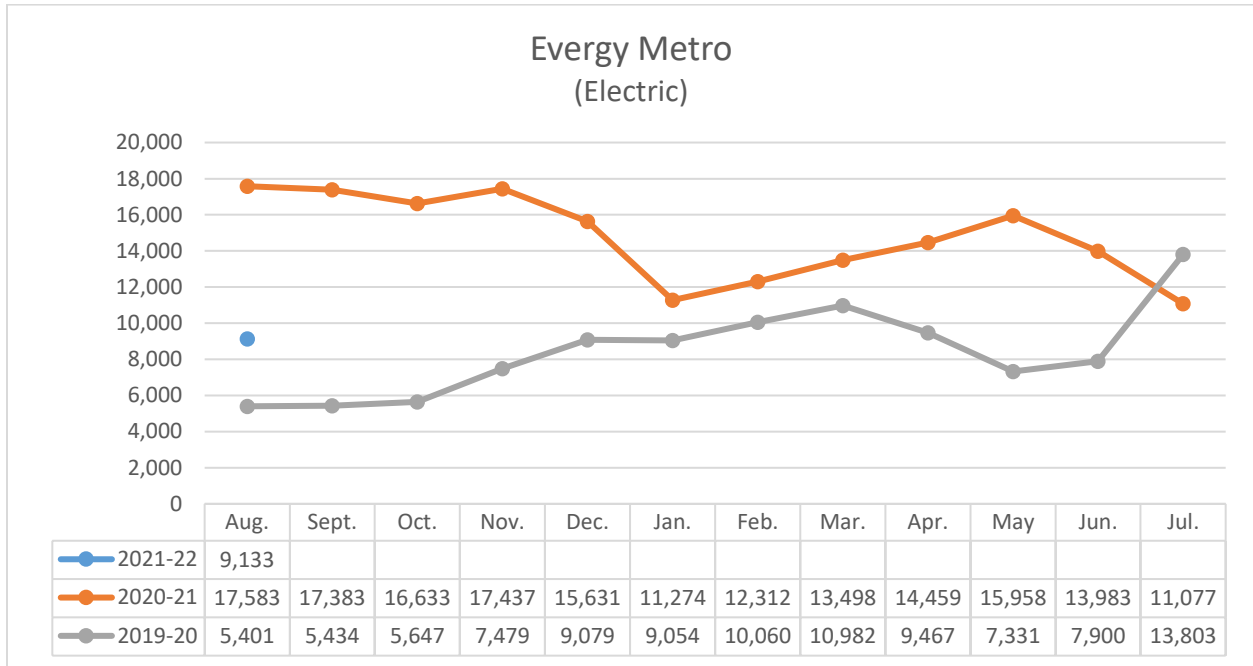
The previous data indicates that there were 33% more Evergy Metro customers with past-due accounts in August 2021 versus August 2020 and approximately 3% more in August 2021 than in July 2021. Staff is unable to compare current past-due accounts to pre-pandemic past-due account numbers as Evergy Metro 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 70% fewer customers who were not disconnected in August 2021 versus August 2020 and approximately 21% more customers in August 2021 than in July 2021. There were 77% fewer customers who received a final disconnection notice, but have not been disconnected for non-payment in August 2021 versus pre-pandemic, August 2019.

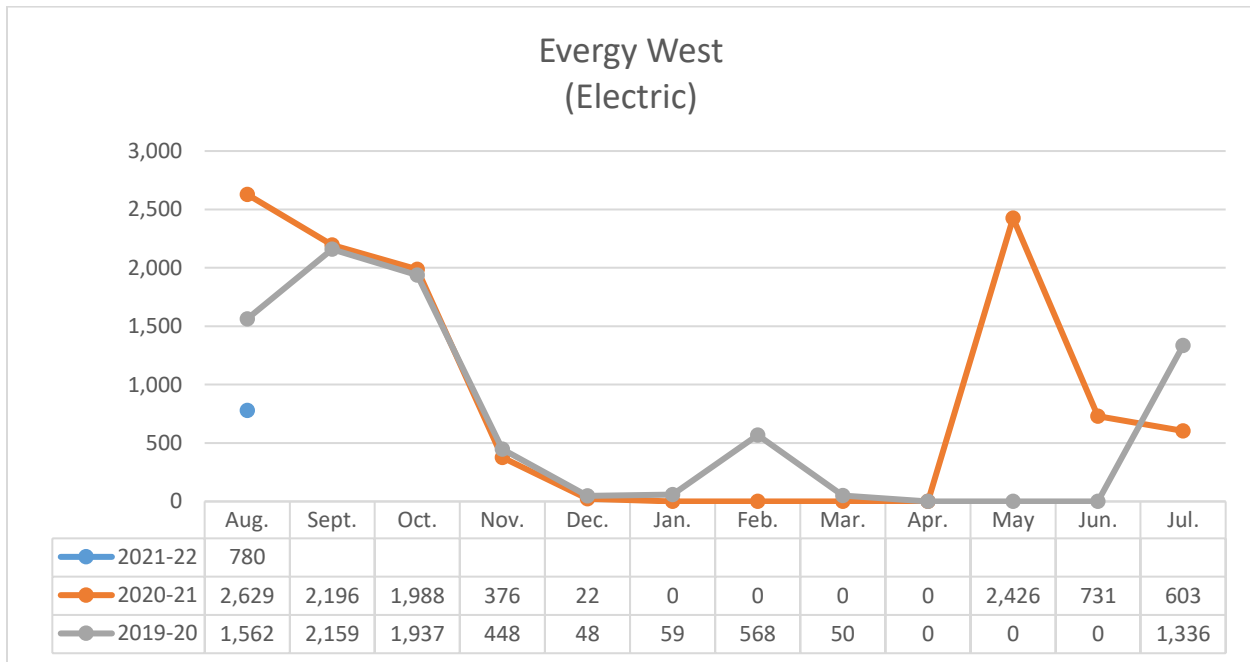
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 48% fewer Evergy Metro customers who participated in payment plans in August 2021 versus August 2020 and about 18% fewer in August 2021 than in July 2021. There were 69% more customers participating in payment plans at month-end in August 2021 versus pre-pandemic, August 2019.

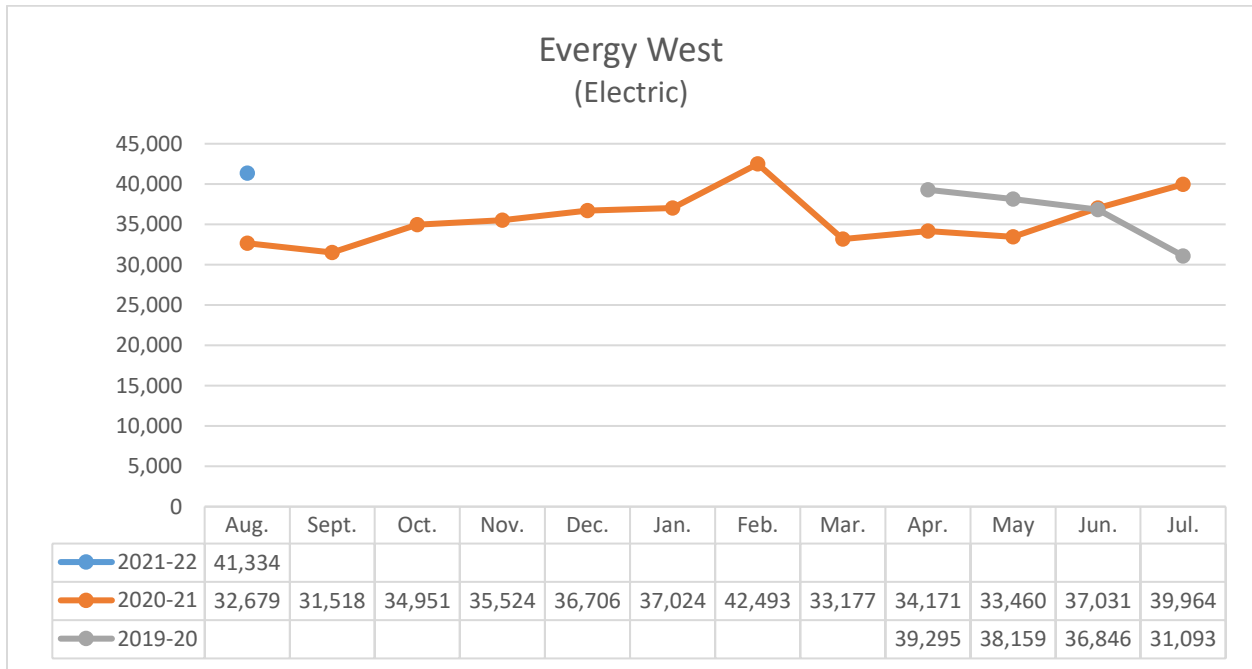
Questions 1 & 3 (Evergny West – Electric)

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



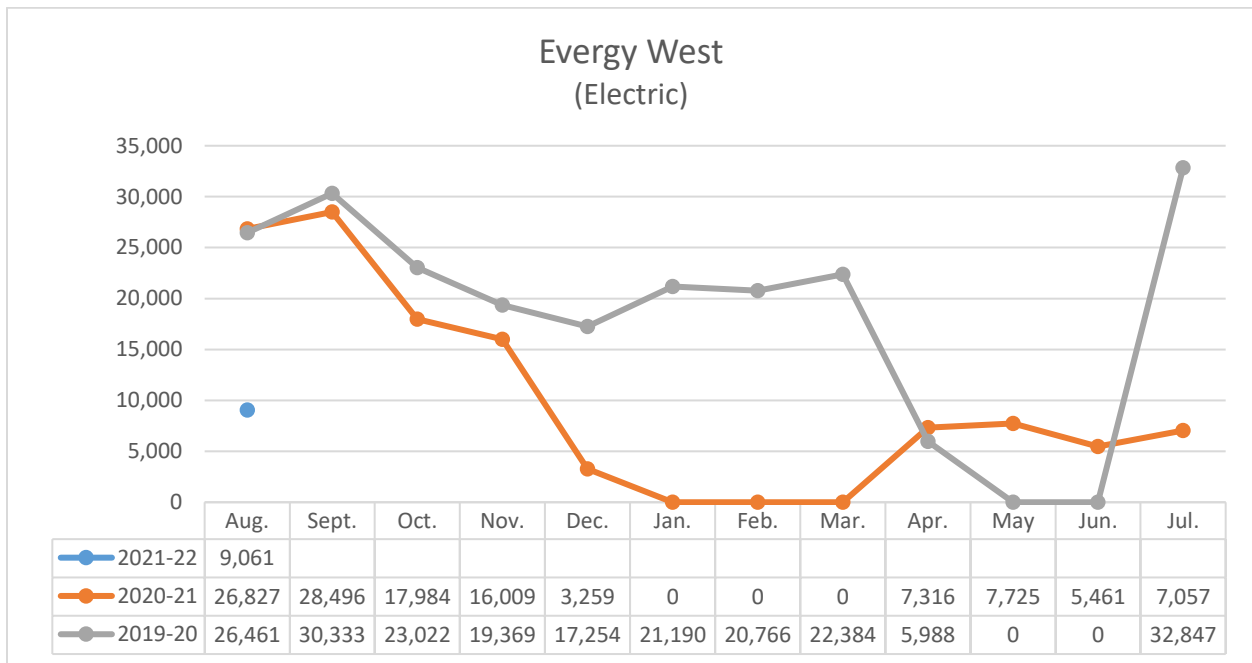
As shown in the previous graph, Evergny West performed 70% fewer disconnections for non-payment in August 2021 versus August 2020 and 29% more in August 2021 than in July 2021. The number of actual disconnections by Evergny West in August 2021 was 65% less than the amount projected by Evergny West for the same month. The number of disconnections for non-payment of services in August 2021 was 50% less than pre-pandemic, August 2019.

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



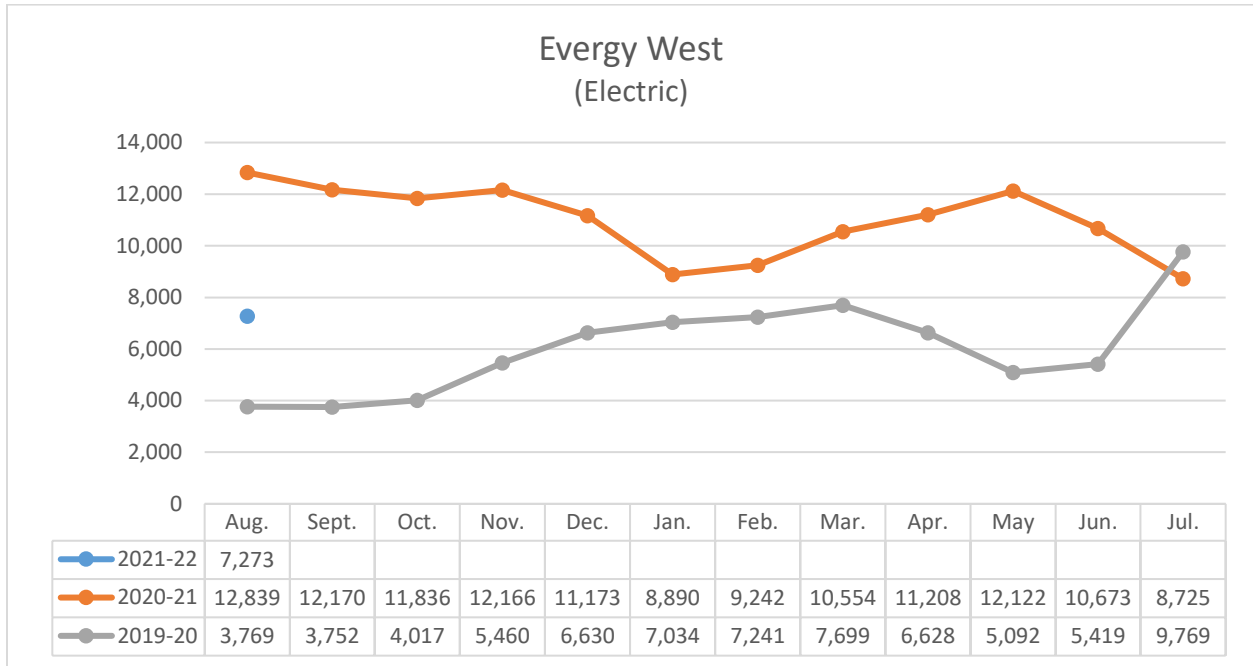
The previous data indicates that there were 26% more Evergy West customers with past-due accounts in August 2021 versus August 2020 and approximately 3% more in August 2021 than in July 2021. Staff is unable to compare current past-due accounts to pre-pandemic past-due account numbers as Evergy Metro was unable to provide historical data from August 2019 – March 2020. Evergy 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 66% fewer customers who were not disconnected in August 2021 versus August 2020 and approximately 28% more customers in August 2021 than in July 2021. There are 66% fewer customers who have received a final disconnection notice, but have not been disconnected for non-payment in August 2021 versus pre-pandemic, August 2019.

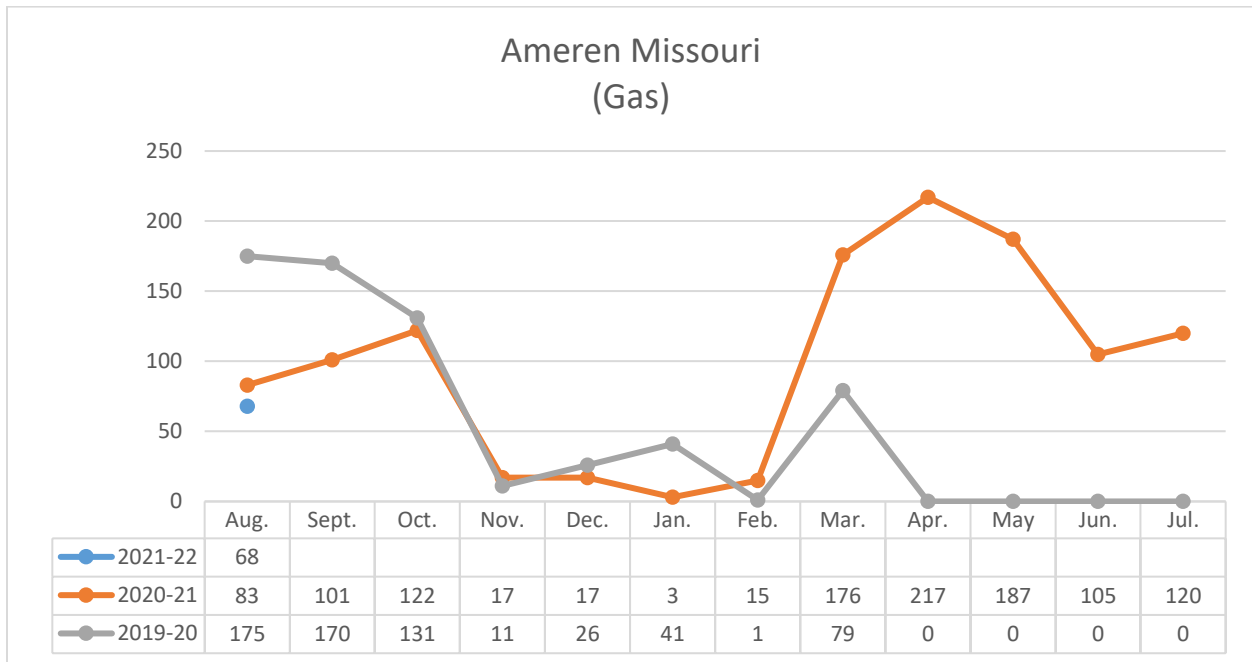
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 43% fewer Evergy West customers who participated in payment plans in August 2021 versus August 2020 and about 17% fewer in August 2021 than in July 2021. There were 93% more customers participating in payment plans at month-end in August 2021 versus pre-pandemic, August 2019.

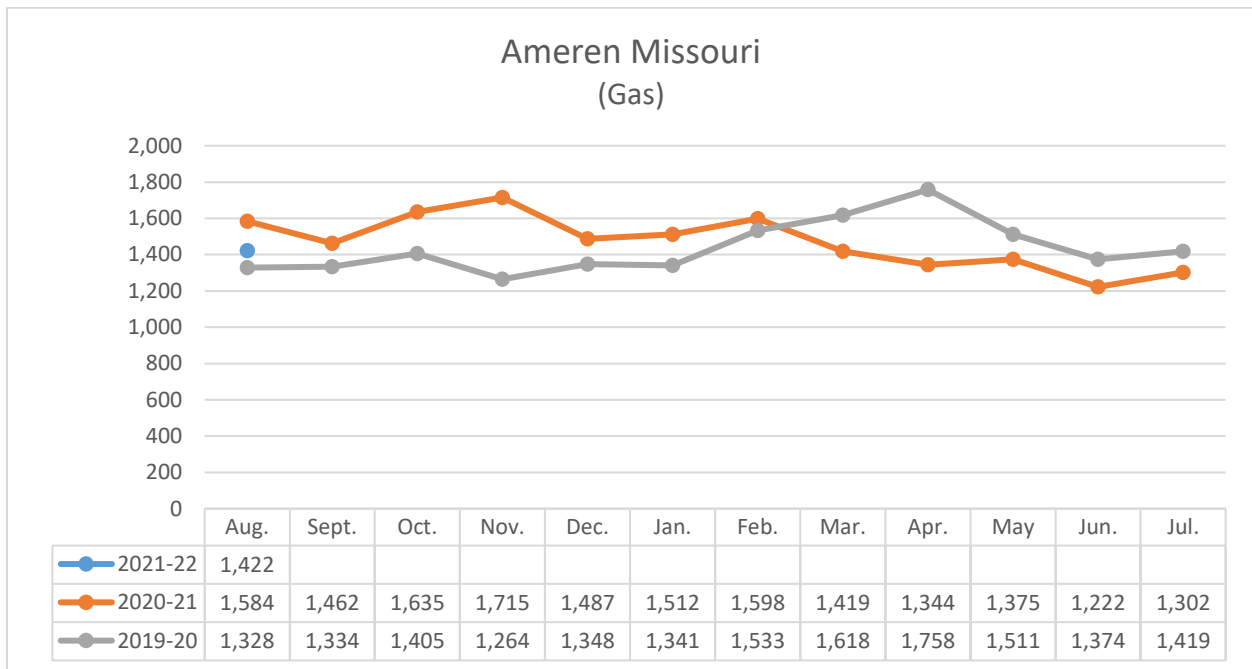
Questions 1 & 3 (Ameren Missouri – Gas)

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



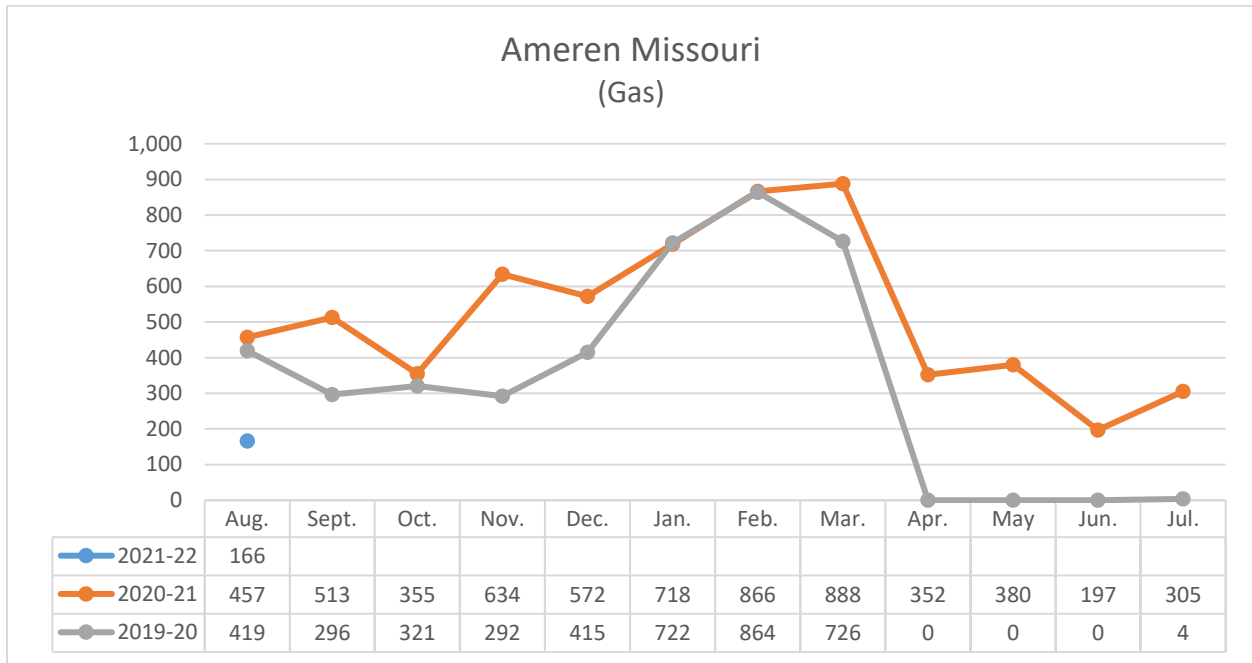
As shown in the previous graph, Ameren Missouri performed 18% fewer disconnections for non-payment in August 2021 versus in August 2020 and about 43% fewer in August 2021 than in July 2021. The number of actual disconnections by Ameren Missouri in August 2021 was 15% below the amount projected by Ameren Missouri for the same month. There were 61% fewer disconnections for non-payment services in August 2021 versus pre-pandemic, August 2019.

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



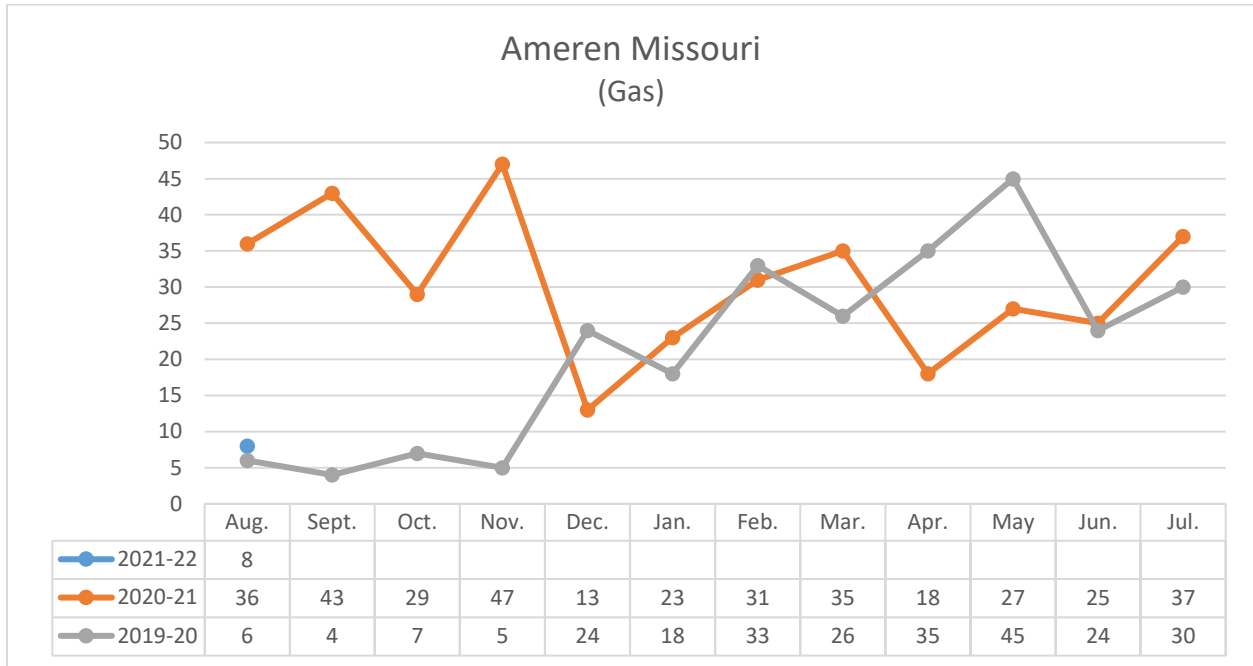
The previous data indicates that there were approximately 10% fewer Ameren Missouri customers with past-due accounts in August 2021 versus August 2020 and approximately 9% more in August 2021 than in July 2021. There were 7% more customers with past-due accounts in August 2021 versus pre-pandemic, August 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 64% fewer customers who were not disconnected in August 2021 versus in August 2020 and approximately 46% fewer in August 2021 than in July 2021. There were 60% fewer customers who received a final disconnection notice, but have not been disconnected for non-payment in August 2021 versus pre-pandemic, August 2019.

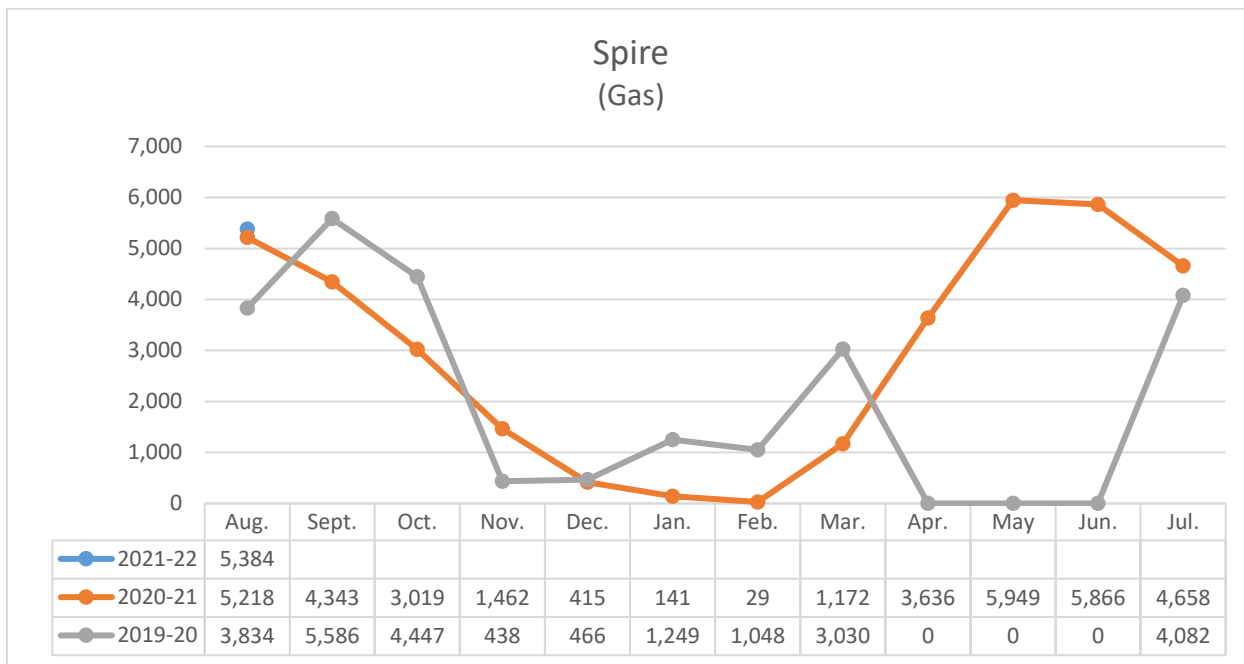
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 78% fewer Ameren Missouri customers who participated in payment plans in August 2021 versus August 2020 and about 78% fewer in August 2021 than in July 2021. The data provided by Ameren Missouri shows that there were 8 customers participating in payment plans in August 2021 versus 6 in August 2019.

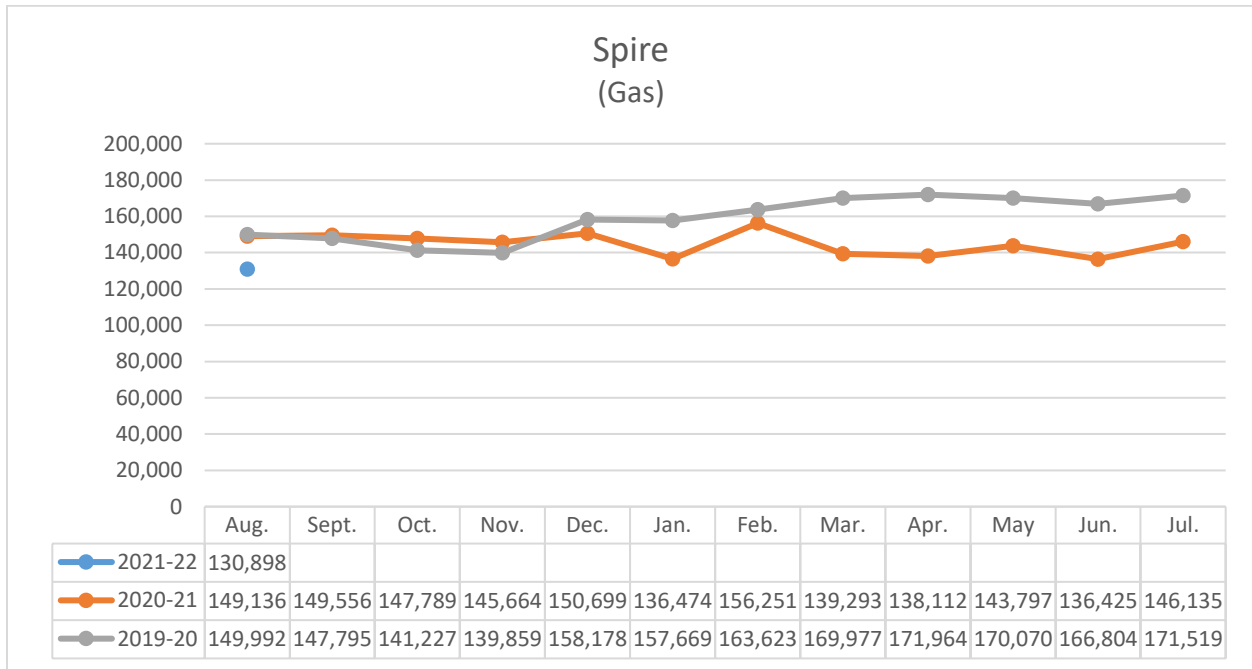
Questions 1 & 3 (Spire - Gas)

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



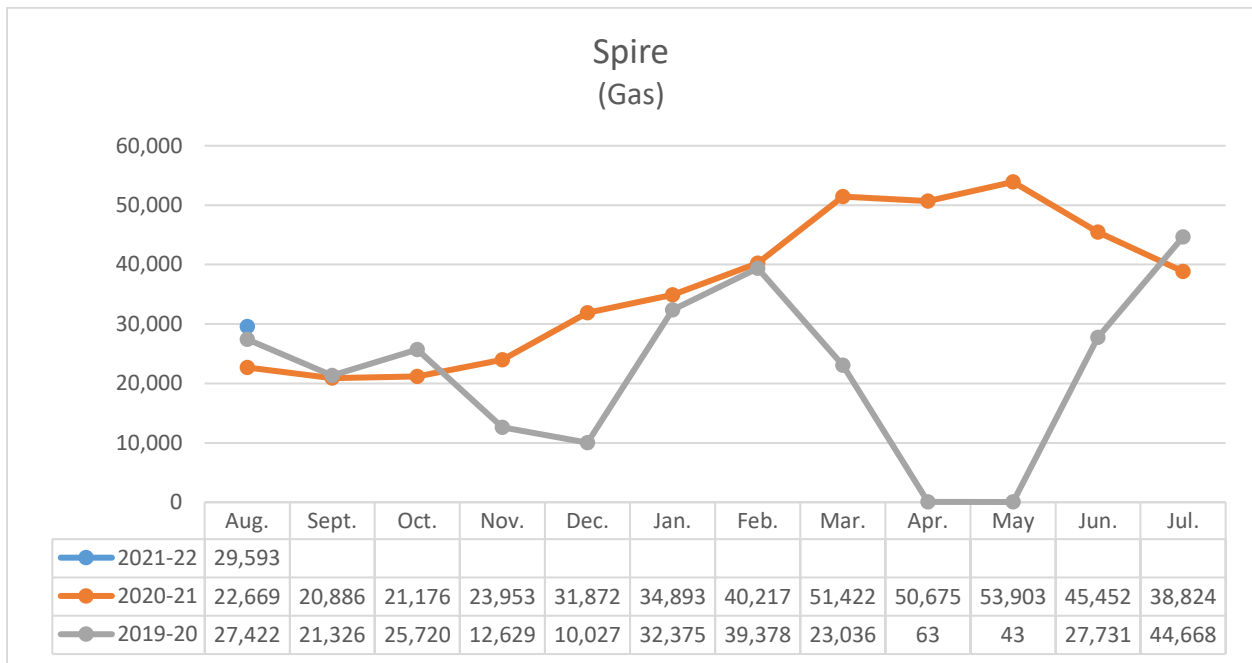
As shown in the previous graph, Spire performed 3% more disconnections for non-payment in August 2021 versus August 2020 and approximately 16% more in August 2021 than in July 2021. The number of actual disconnections by Spire in August 2021 was 8% higher than the amount projected by Spire for the same month. There were 40% more disconnections for non-payment in August 2021 versus pre-pandemic, August 2019.

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



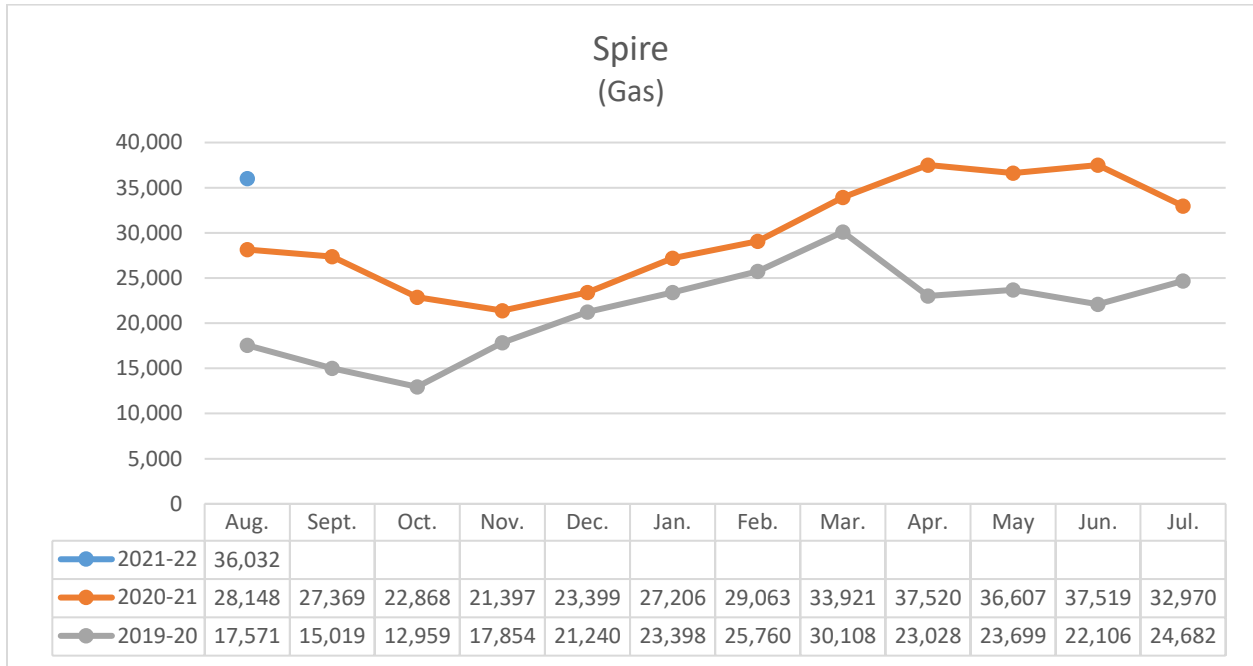
The previous data indicates that there were about 12% fewer Spire customers with past-due accounts in August 2021 versus August 2020 and approximately 10% fewer in August 2021 than in July 2021. There were 13% fewer customers with past-due accounts in August 2021 versus pre-pandemic, August 2019. Spire 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 31% more customers who were not disconnected in August 2021 versus in August 2020 and approximately 24% fewer in August 2021 than in July 2021. There were 8% more customers who have received a final disconnection notice, but have not been disconnected for non-payment of services in August 2021 versus pre-pandemic, August 2019.

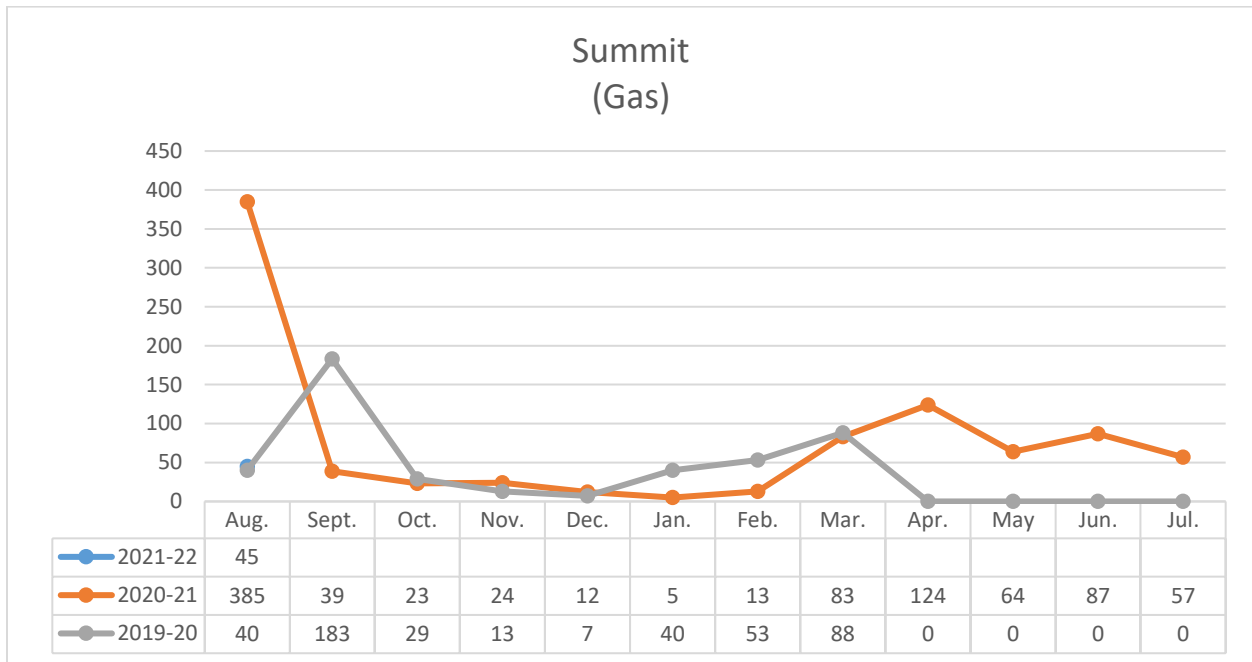
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 28% more Spire customers who participated in payment plans in August 2021 versus August 2020 and about 9% more in August 2021 than in July 2021. There were 105% more customers participating in payments plans in August 2021 versus pre-pandemic, August 2019.

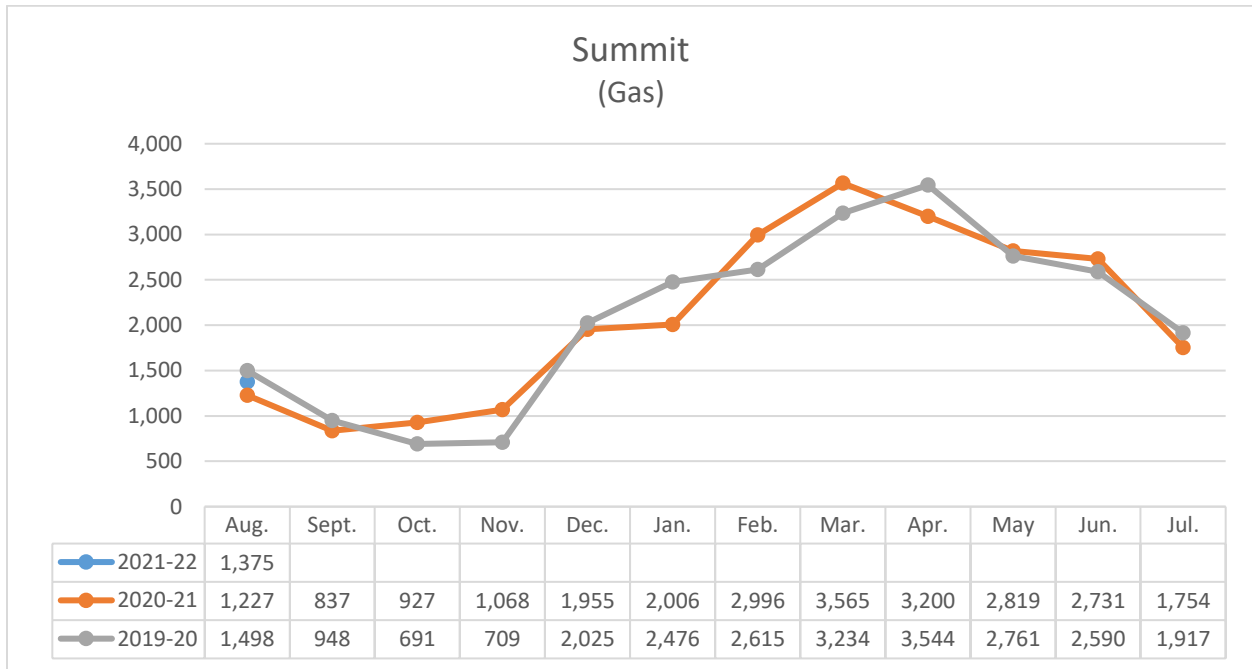
Questions 1 & 3 (Summit - Gas)

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



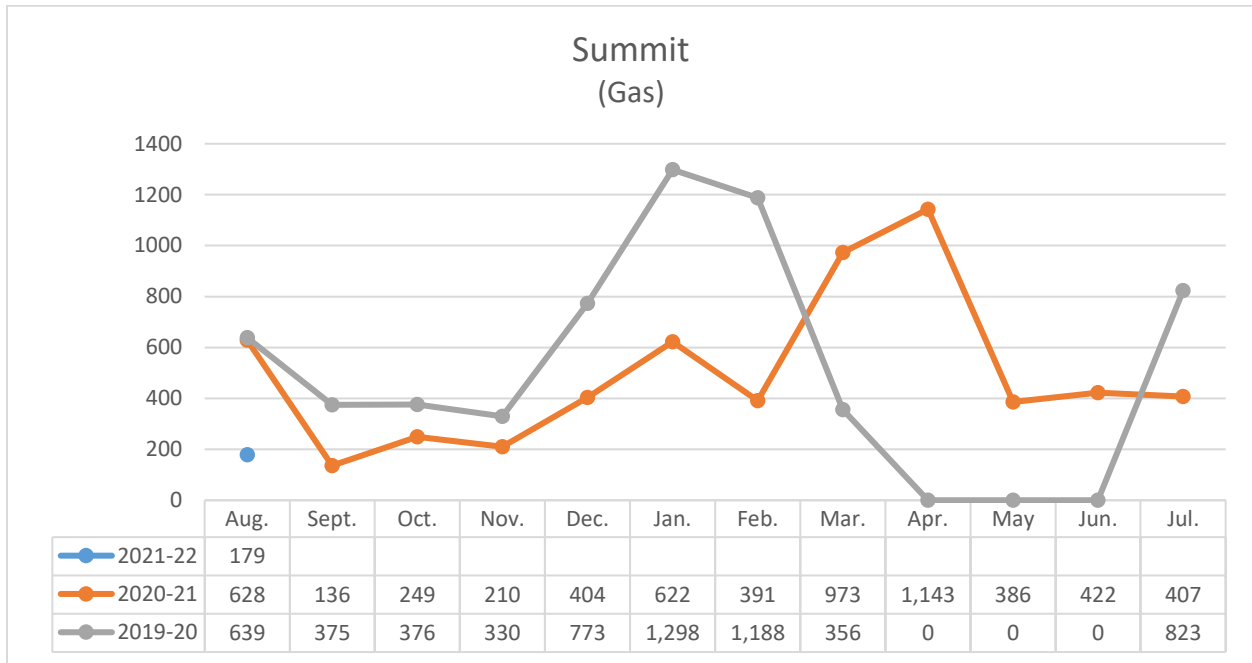
As shown in the previous graph, Summit performed 88% fewer disconnections for non-payment in August 2021 versus August 2020 and about 21% fewer in August 2021 than in July 2021. The number of actual disconnections by Summit in August 2021 was about 70% below the amount projected by Summit for the same month. There were 13% more disconnections for non-payment of services in August 2021 versus pre-pandemic, August 2019.

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



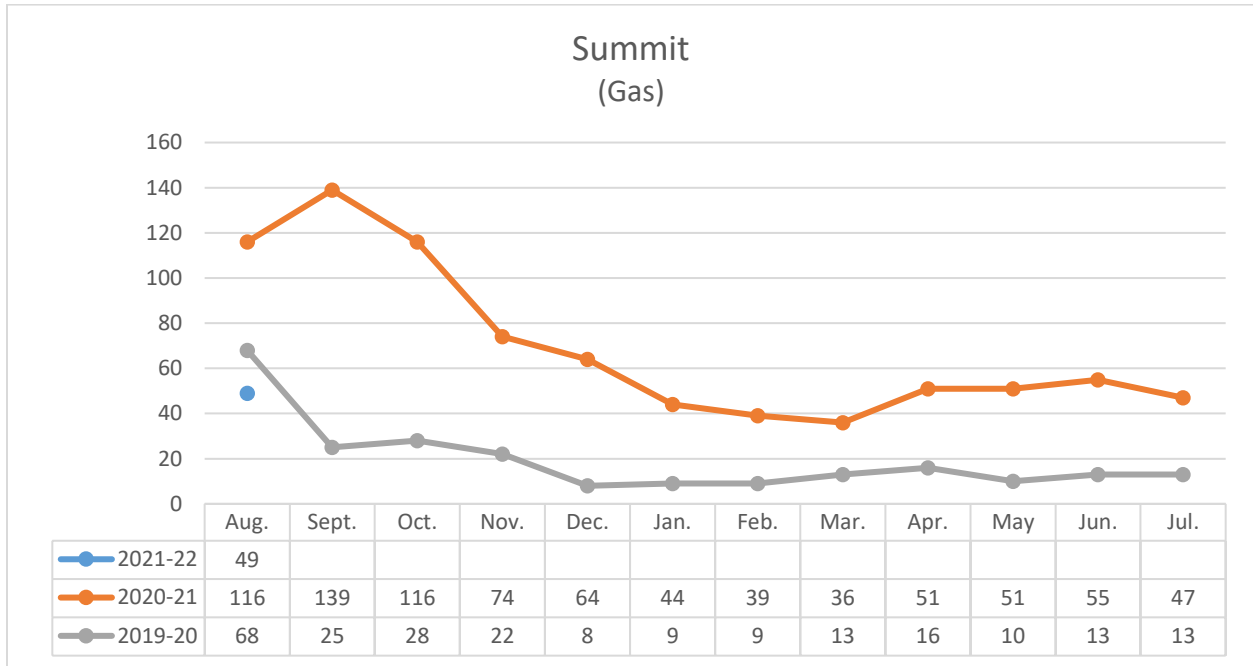
The previous data indicates that there were about 12% more Summit customers with past-due accounts in August 2021 versus August 2020 and approximately 22% fewer in August 2021 than in July 2021. There were 8% fewer customers with past-due accounts as of month-end in August 2021 versus pre-pandemic, August 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 71% fewer customers who were not disconnected in August 2021 versus August 2020 and approximately 56% fewer in August 2021 than in July 2021. There were 72% fewer customers who have received a final disconnection notice, but have not been disconnected for non-payment of services in August 2021 versus pre-pandemic, August 2019.

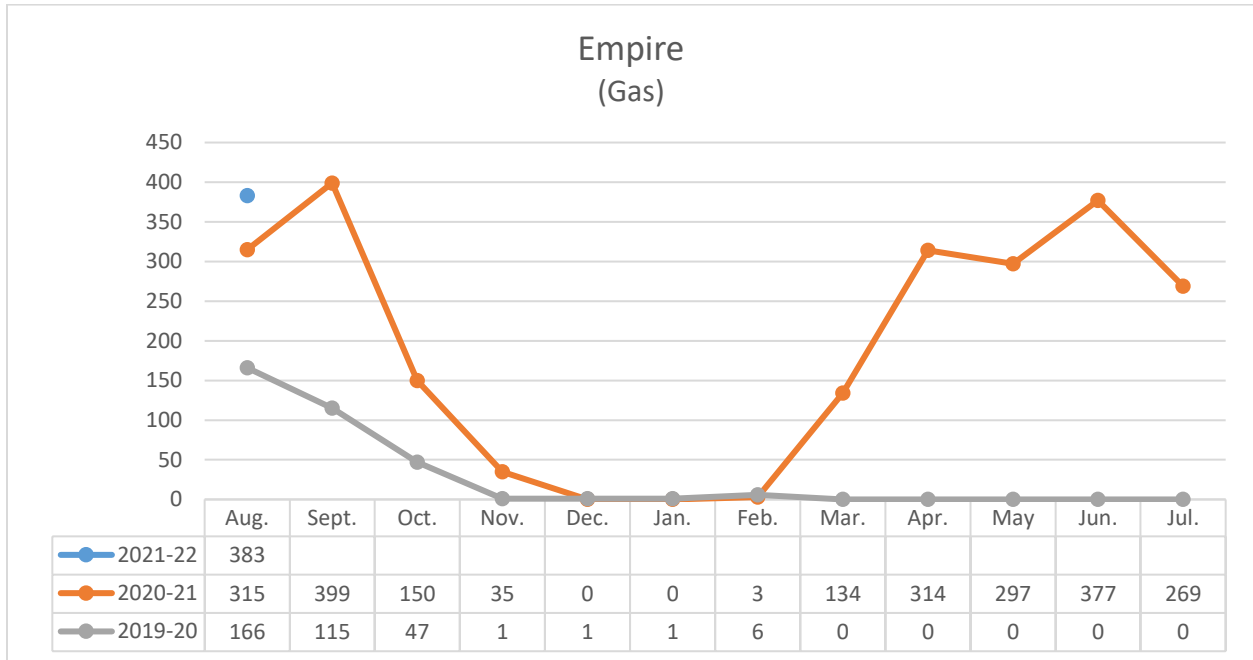
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 58% fewer Summit customers who participated in payment plans in August 2021 versus August 2020 and 4% more customers who participated in payment plans in August 2021 than in July 2021. There were 39% fewer customers participating in payment plans in August 2021 versus pre-pandemic, August 2019.

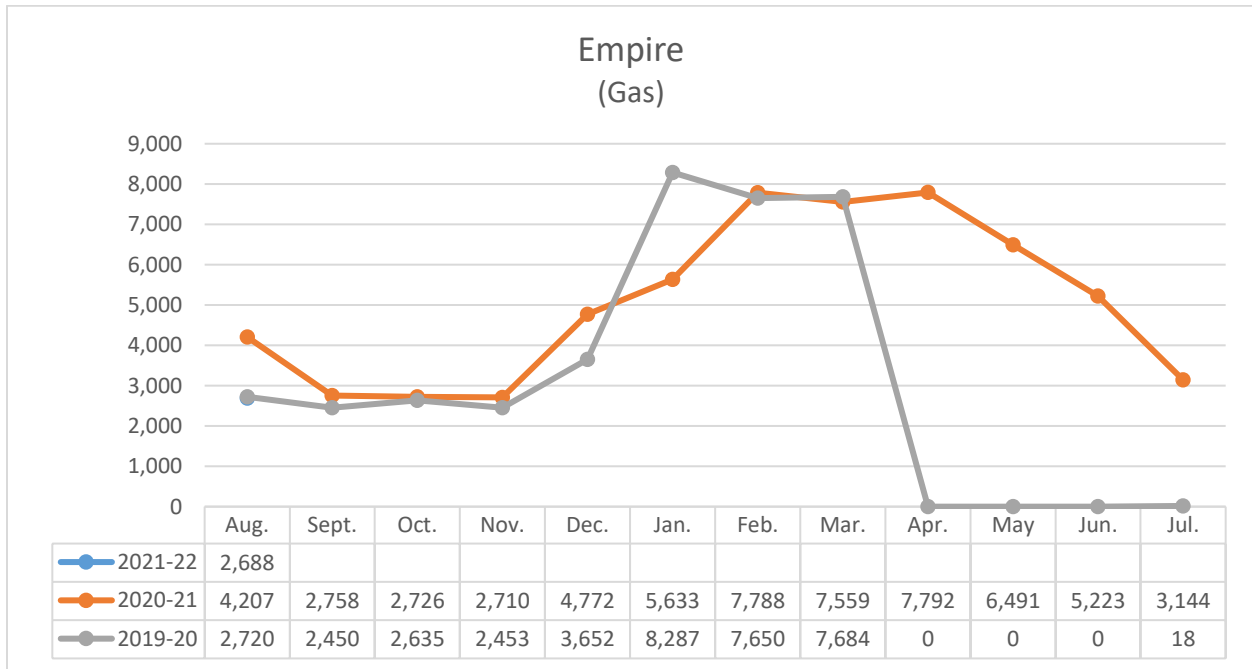
Questions 1 & 3 (Empire - Gas)

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



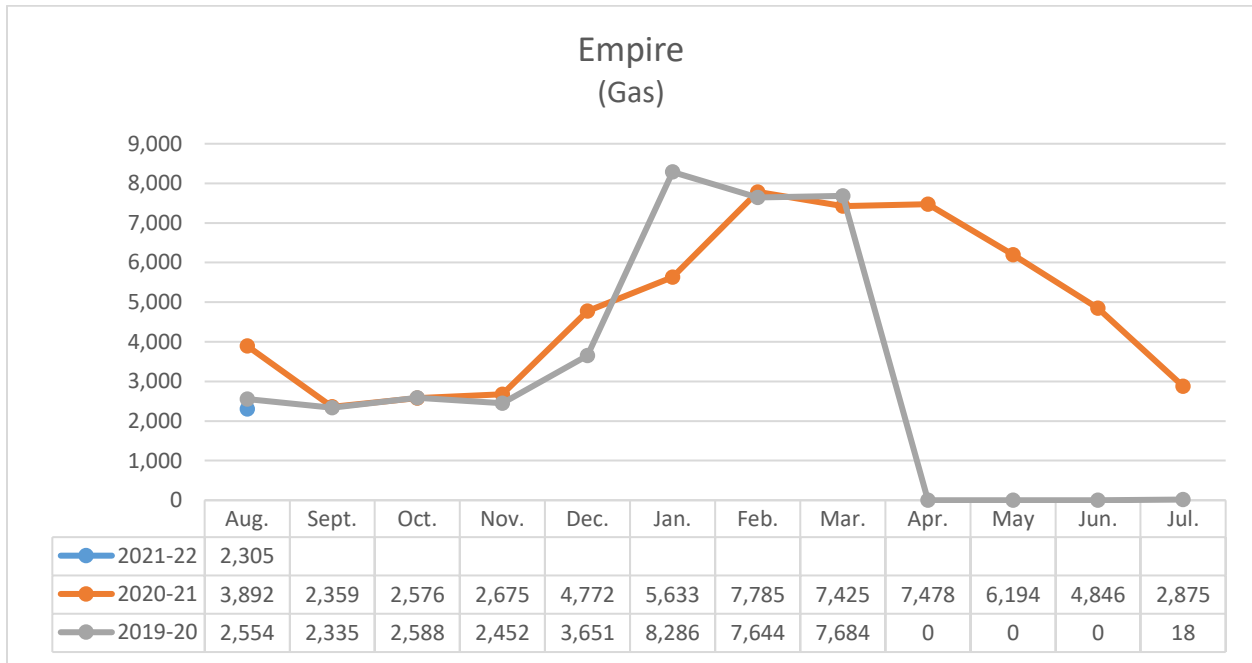
As shown in the previous graph, Empire performed 22% more disconnections for non-payment in August 2021 versus in August 2020 and about 42% more in August 2021 than in July 2021. The number of actual disconnections by Empire in July 2021 was about 4% below the amount projected by Empire for the same month. There were 131% more disconnections for non-payment of services in August 2021 versus pre-pandemic, August 2019.

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



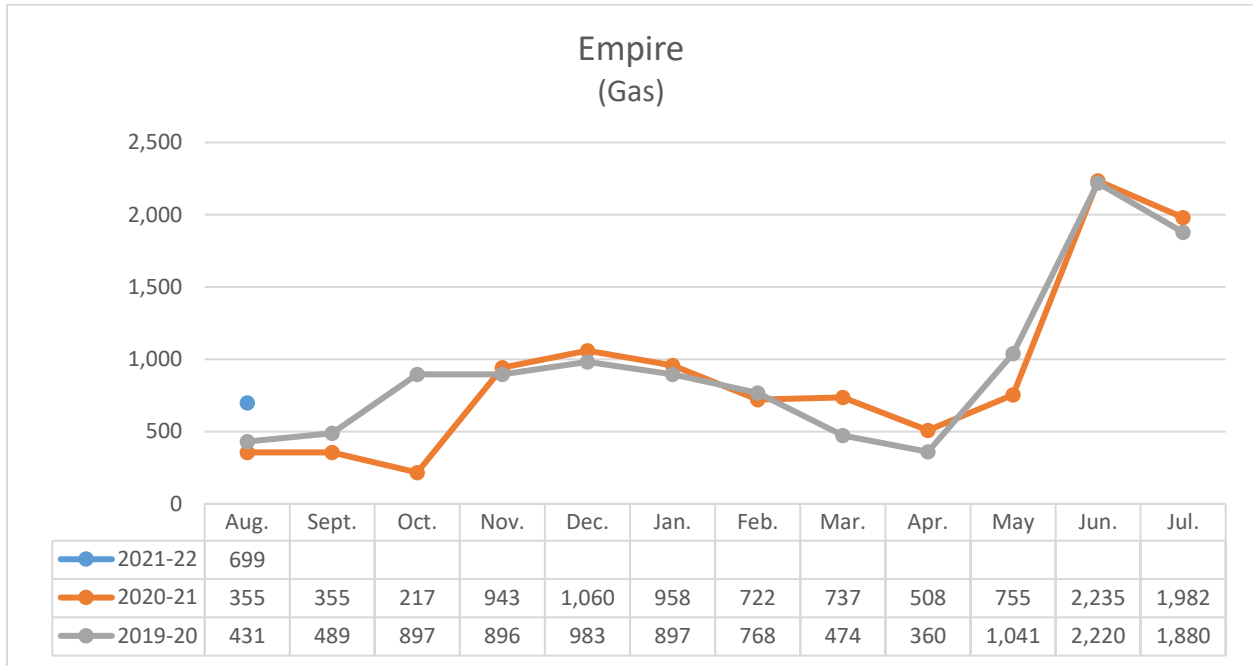
The previous data indicates that there were 36% fewer Empire customers with past-due accounts in August 2021 versus August 2020 and approximately 15% fewer in August 2021 than in July 2021. There were 1% fewer customers with past-due accounts in August 2021 versus pre-pandemic, August 2019. Empire reported 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 14% fewer customers who were not disconnected in August 2021 versus August 2020 and approximately 20% fewer in August 2021 than in July 2021. There were 10% fewer customers who have received a final disconnection notice, but have not been disconnected in August 2021 versus pre-pandemic, August 2019.

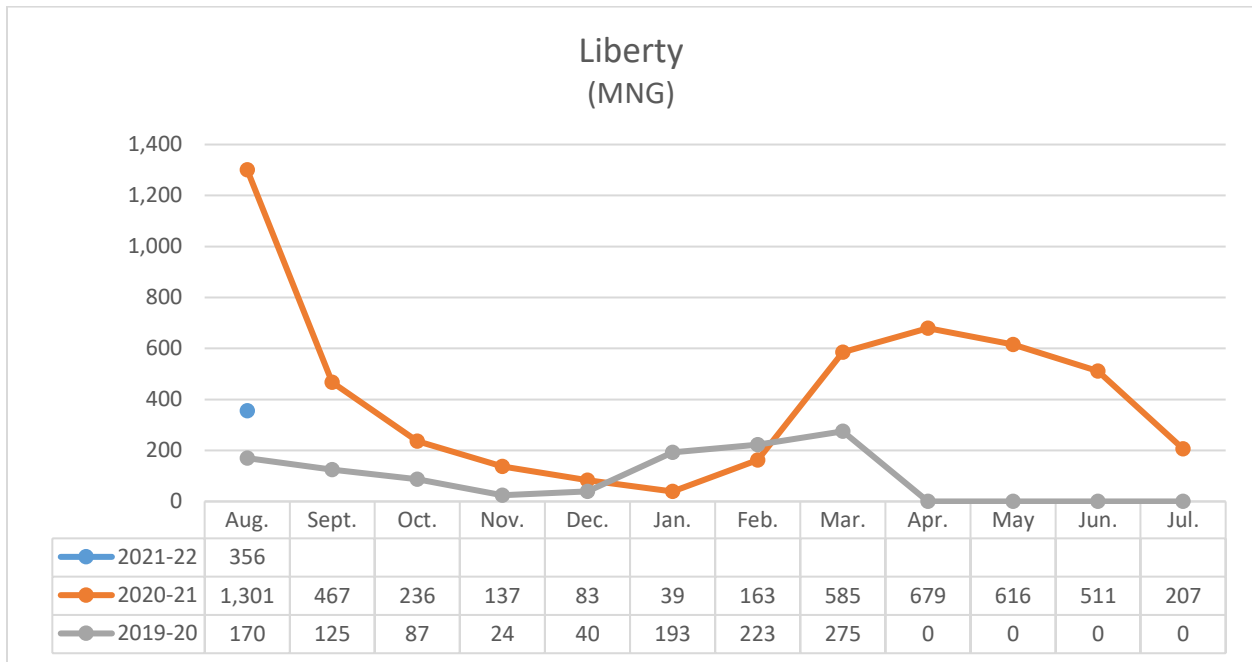
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 97% more Empire customers who participated in payment plans in August 2021 versus August 2020 and about 65% fewer in August 2021 than in July 2021. There were 62% more customers participating in payment plans in August 2021 versus pre-pandemic, August 2019.

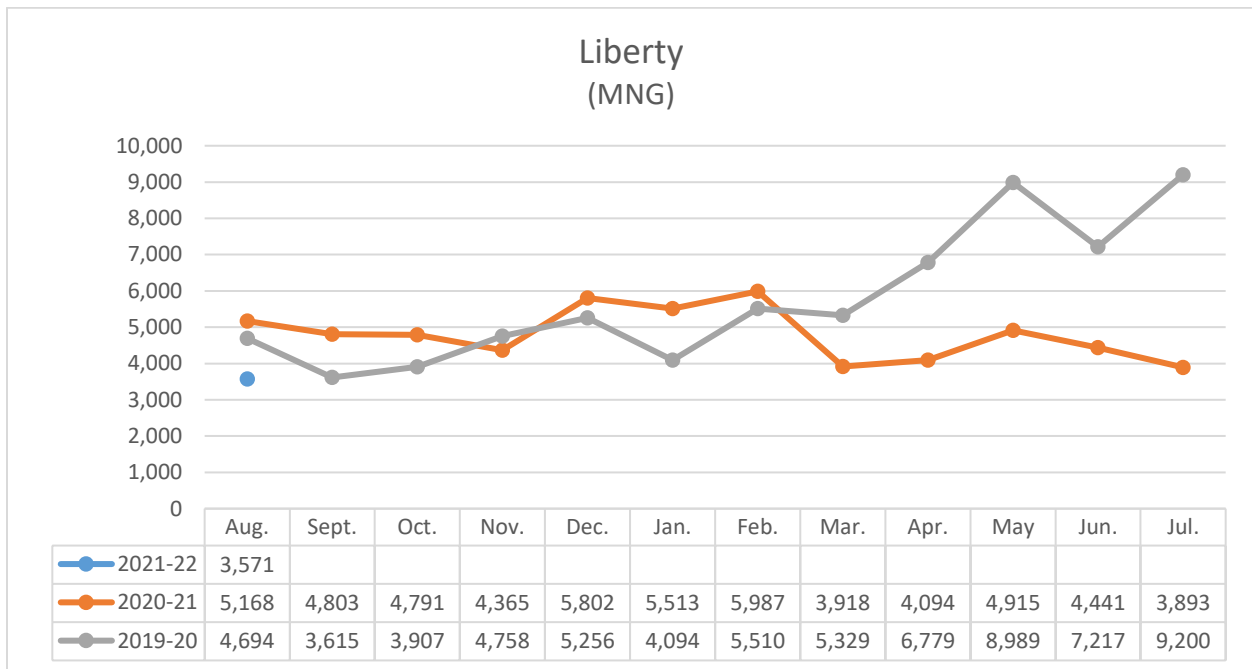
Questions 1 & 3 (Liberty (MNG) - Gas)

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



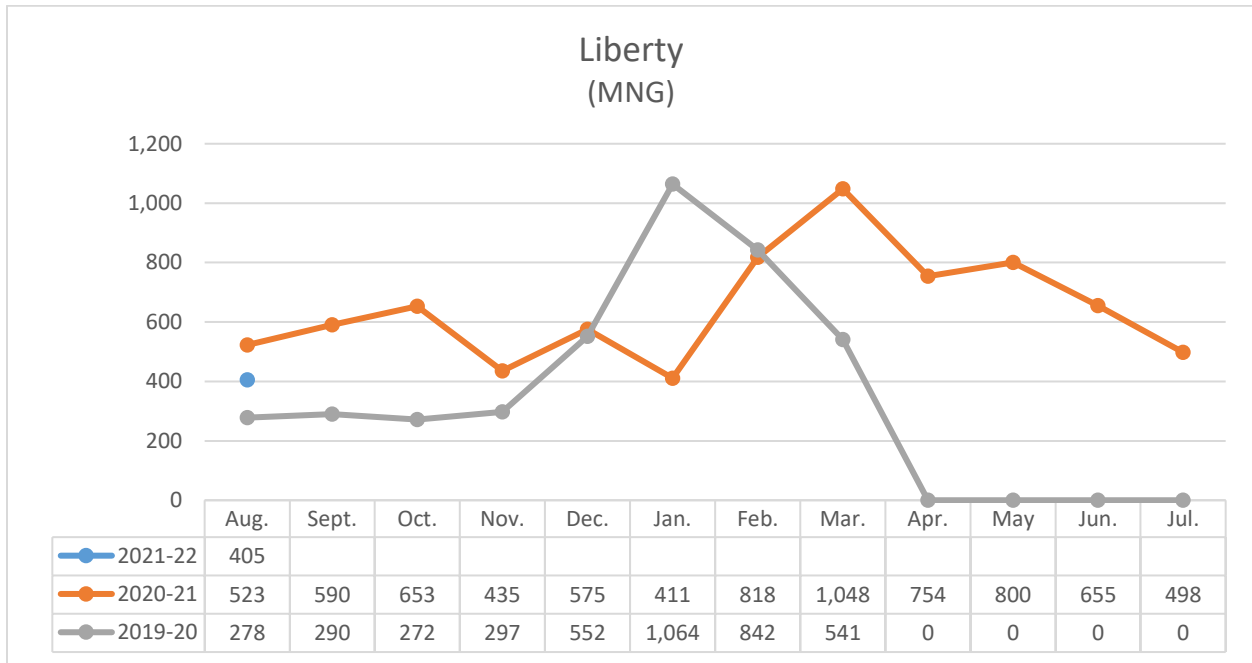
As shown in the previous graph, Liberty (MNG) performed 265% fewer disconnections for non-payment in August 2021 versus August 2020 and about 72% more in August 2021 than in July 2021. The number of actual disconnections by Liberty (MNG) in August 2021 was about 42% more than the amount projected by Liberty (MNG) for the same month. There were 109% more disconnections for non-payment in August 2021 versus pre-pandemic, August 2019.

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



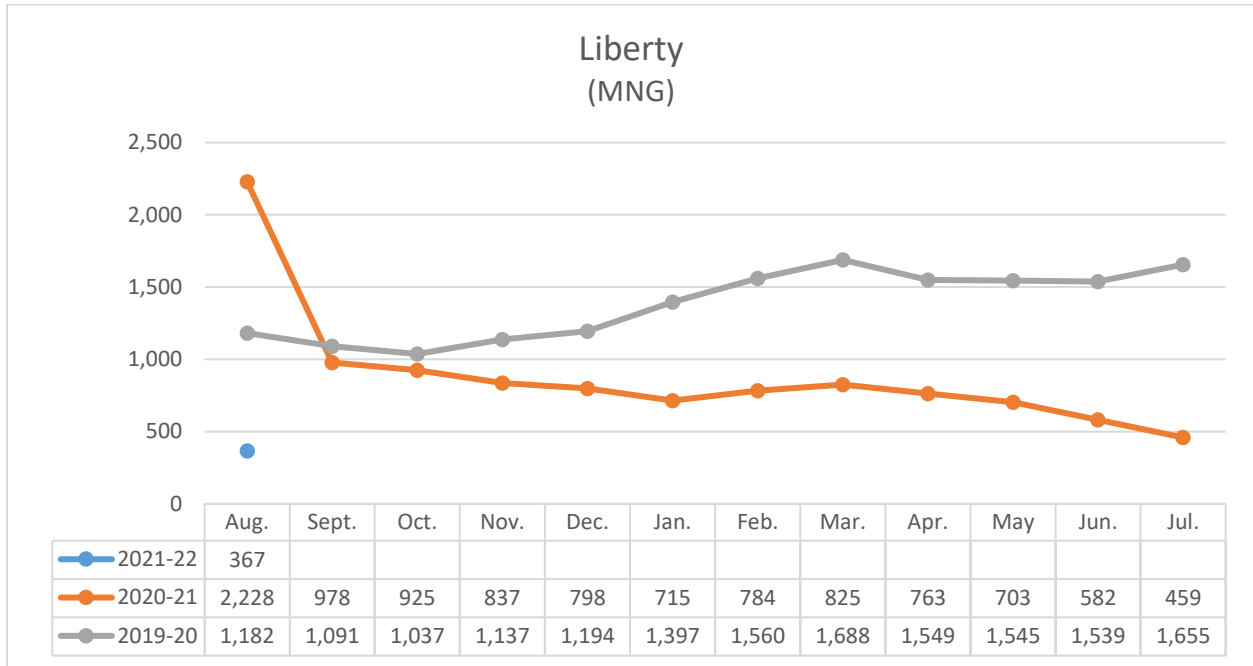
The previous data indicates that there were approximately 31% fewer Liberty (MNG) customers with past-due accounts in August 2021 versus August 2020 and approximately 8% fewer in August 2021 than in July 2021. There were 24% fewer customers with past-due accounts in August 2021 versus pre-pandemic, August 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% fewer customers who were not disconnected in August 2021 versus August 2020 and approximately 19% fewer in August 2021 than in July 2021. There were 46% more customers who received a final disconnection notice but were not disconnected in August 2021 versus pre-pandemic, August 2019.

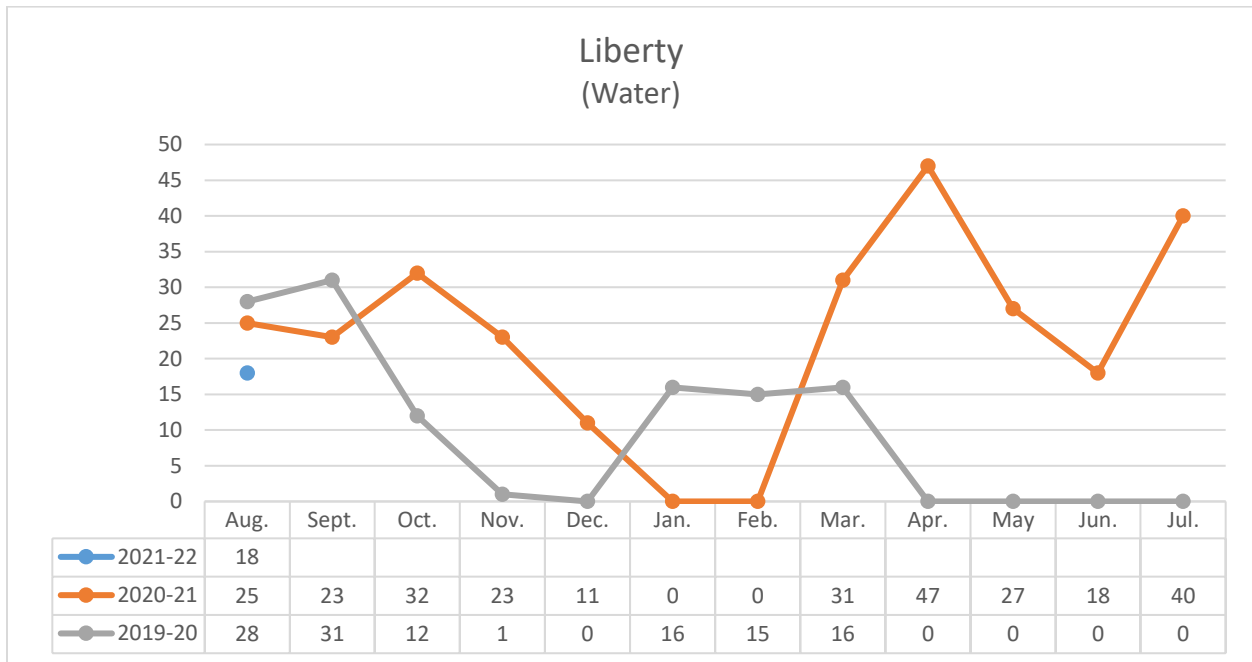
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 507% fewer Liberty (MNG) customers who participated in payment plans in August 2021 versus August 2020 and about 20% fewer in August 2021 than in July 2021. There were 69% fewer customers participating in payment plans in August 2021 versus pre-pandemic, August 2019.

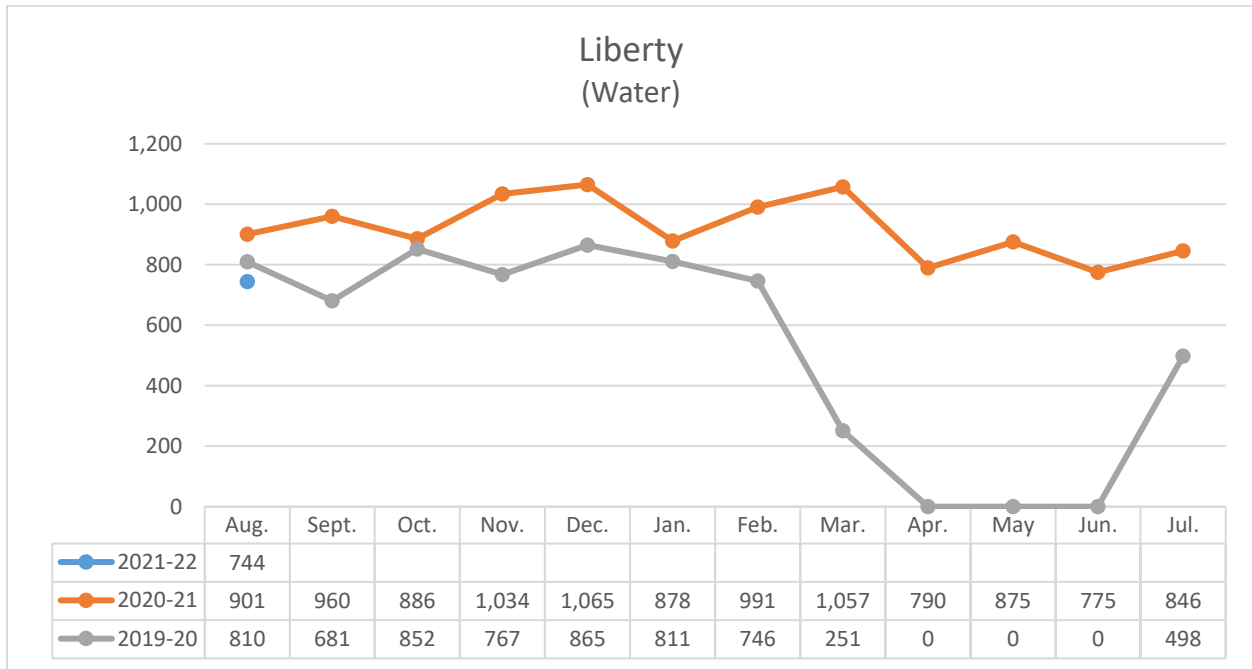
Questions 1 & 3 (Liberty - Water)

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



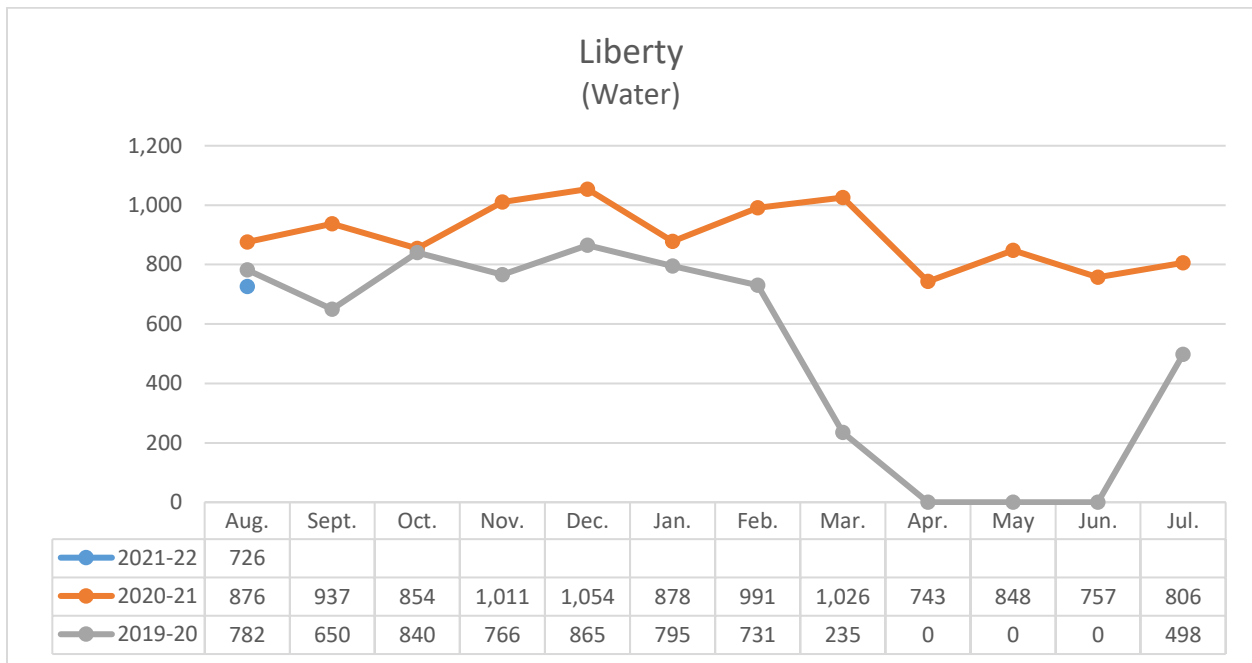
As shown in the previous graph, Liberty performed 28% fewer disconnections for non-payment in August 2021 versus August 2020 and about 55% fewer in August 2021 than in July 2021. The number of actual disconnections by Liberty in July 2021 was about 70% below the amount projected by Liberty for the same month. There were 36% fewer disconnections for non-payment in August 2021 versus pre-pandemic, August 2019.

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



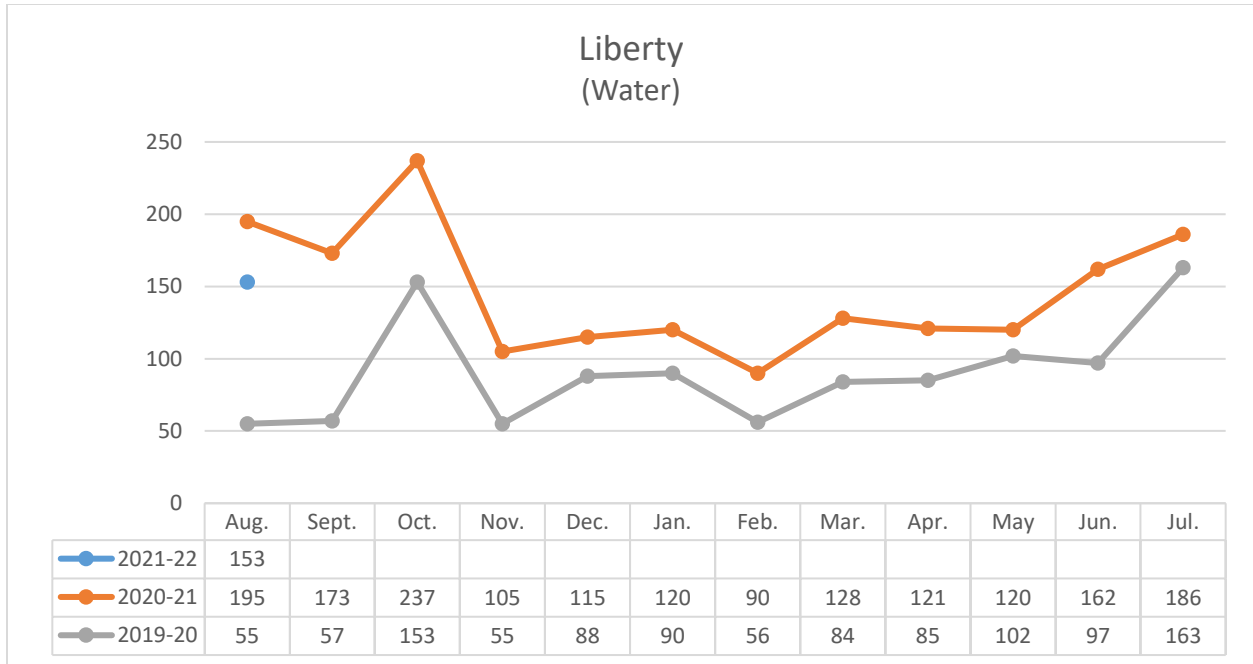
The previous data indicates that there were 17% fewer Liberty customers with past-due accounts in August 2021 versus August 2020 and approximately 12% fewer in August 2021 than in July 2021. There were 8% fewer customers with past-due accounts in August 2021 versus pre-pandemic, August 2019. Liberty 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 17% fewer customers who were not disconnected in August 2021 versus August 2020 and approximately 10% fewer in August 2021 than in July 2021. There were 7% fewer customers who received a final disconnection notice, but have not been disconnected for non-payment in August 2021 versus pre-pandemic, August 2019.

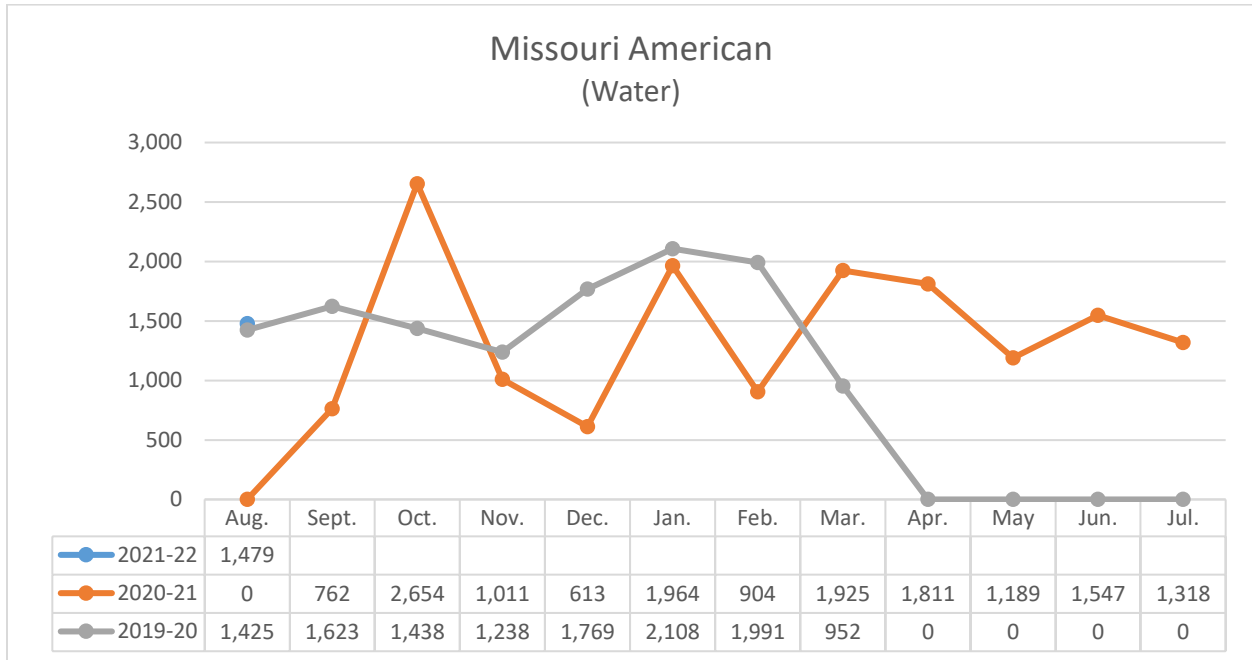
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 22% fewer Liberty customers who participated in payment plans in August 2021 versus August 2020 and about 18% fewer in August 2021 than in July 2021. There were 178% more customers participating in payment plans in August 2021 versus pre-pandemic, August 2019.

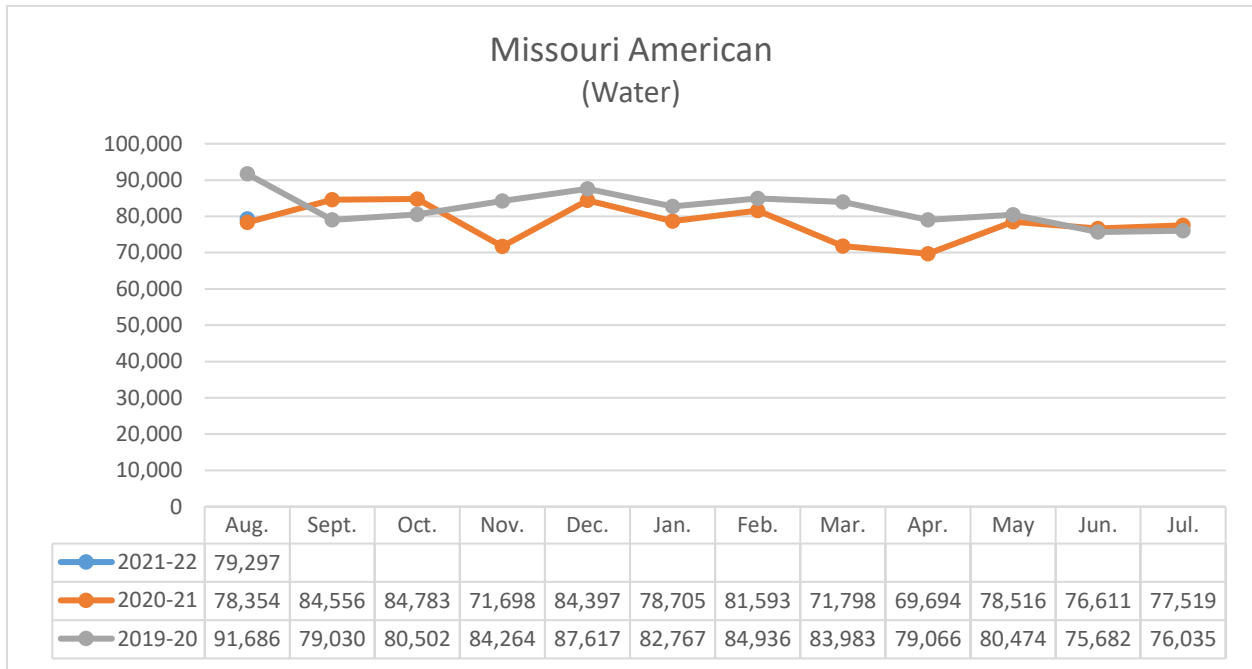
Questions 1 & 3 (Missouri-American - Water)

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



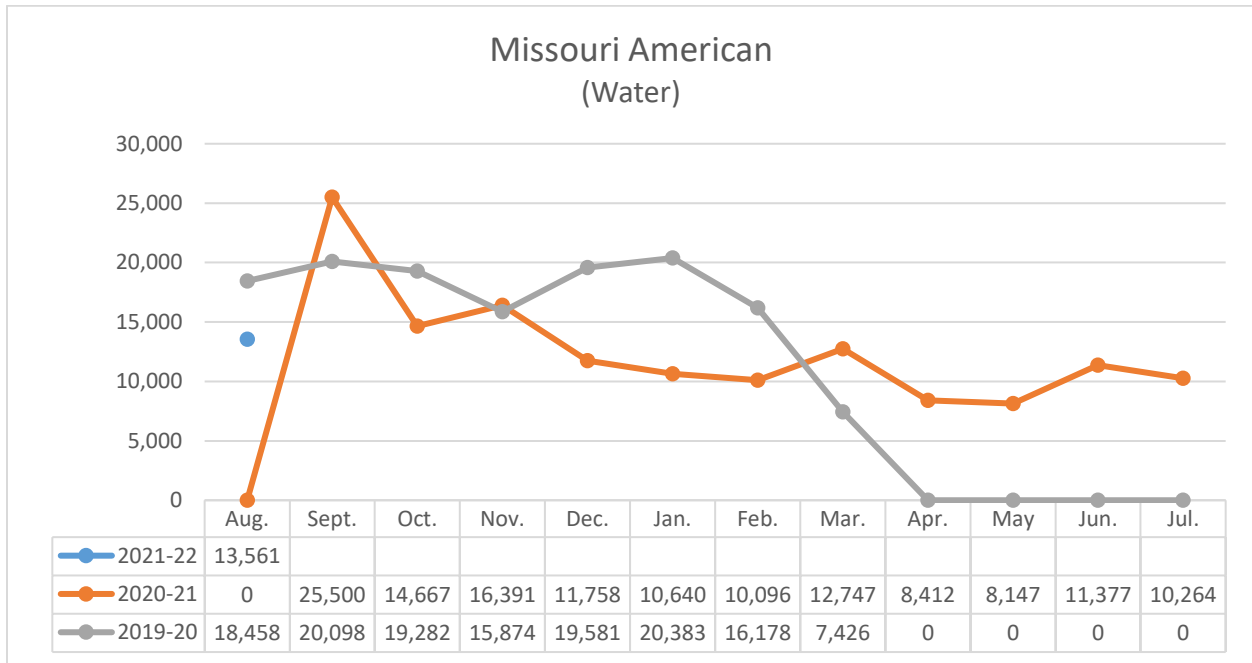
As shown in the previous graph, Missouri-American performed 1,479 disconnections for non-payment in August 2021 versus none in August 2020 and about 12% more in August 2021 than in July 2021. Missouri-American does not forecast the number of disconnections for non-payment. There were 4% more disconnections for non-payment in August 2021 versus pre-pandemic, August 2019.

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



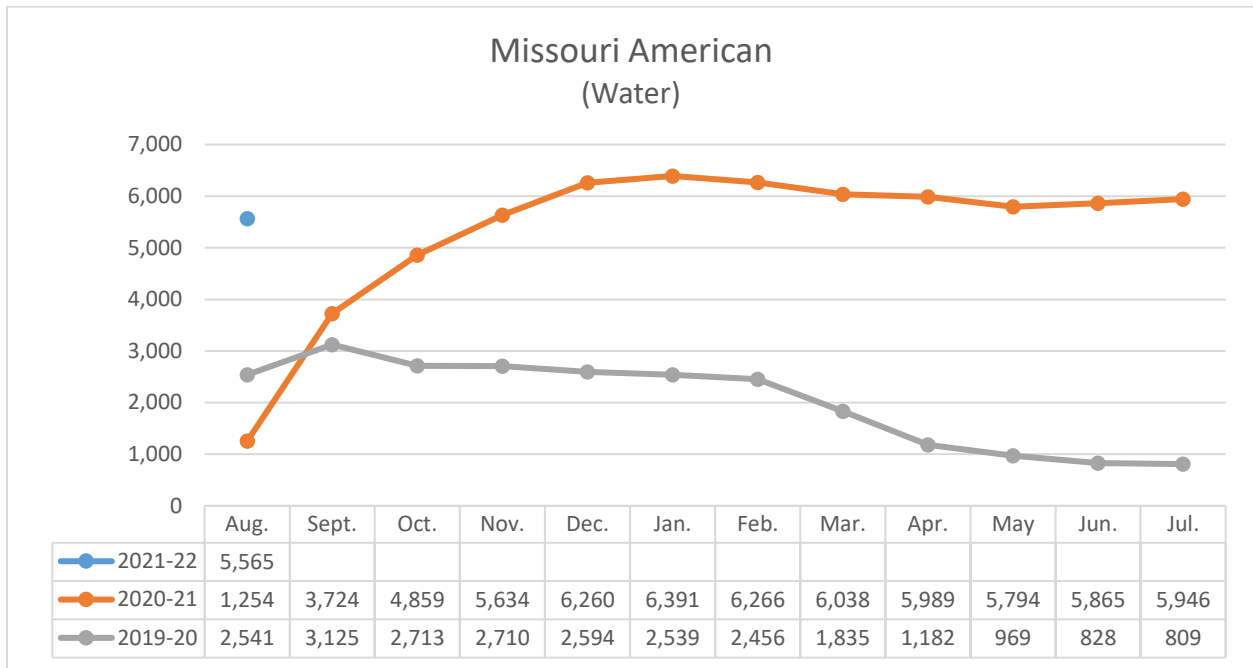
The previous data indicates that there were about 1% more Missouri-American customers with past-due accounts in August 2021 versus August 2020 and approximately 2% more in August 2021 than in July 2021. There were 14% fewer customers with past-due accounts in August 2021 versus pre-pandemic, August 2019. 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 13,561 customers who were not disconnected in August 2021 versus none in August 2020 and approximately 32% more in August 2021 than in July 2021. There were 27% fewer customers who received a final disconnection notice, but have not been disconnected in August 2021 versus pre-pandemic, August 2019.

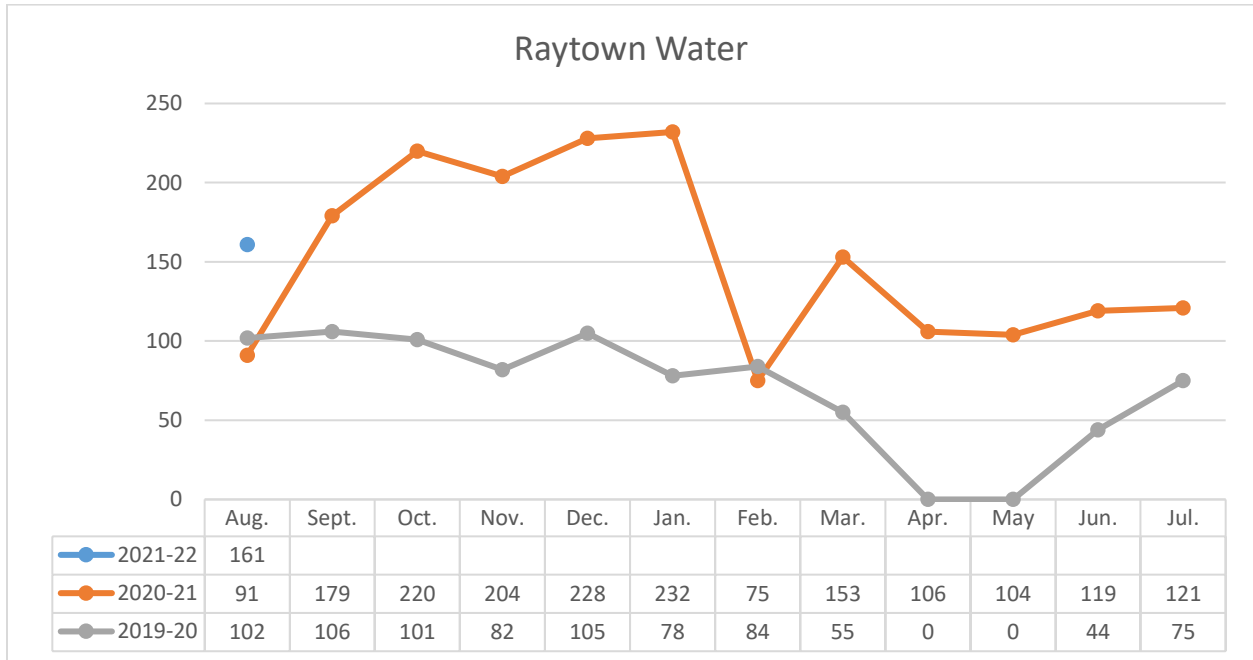
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were approximately 344% more Missouri-American customers who participated in payment plans in August 2021 versus August 2020 and about 6% fewer in August 2021 than in July 2021. There were 119% more customers participating in payment plans in August 2021 versus pre-pandemic, August 2019.

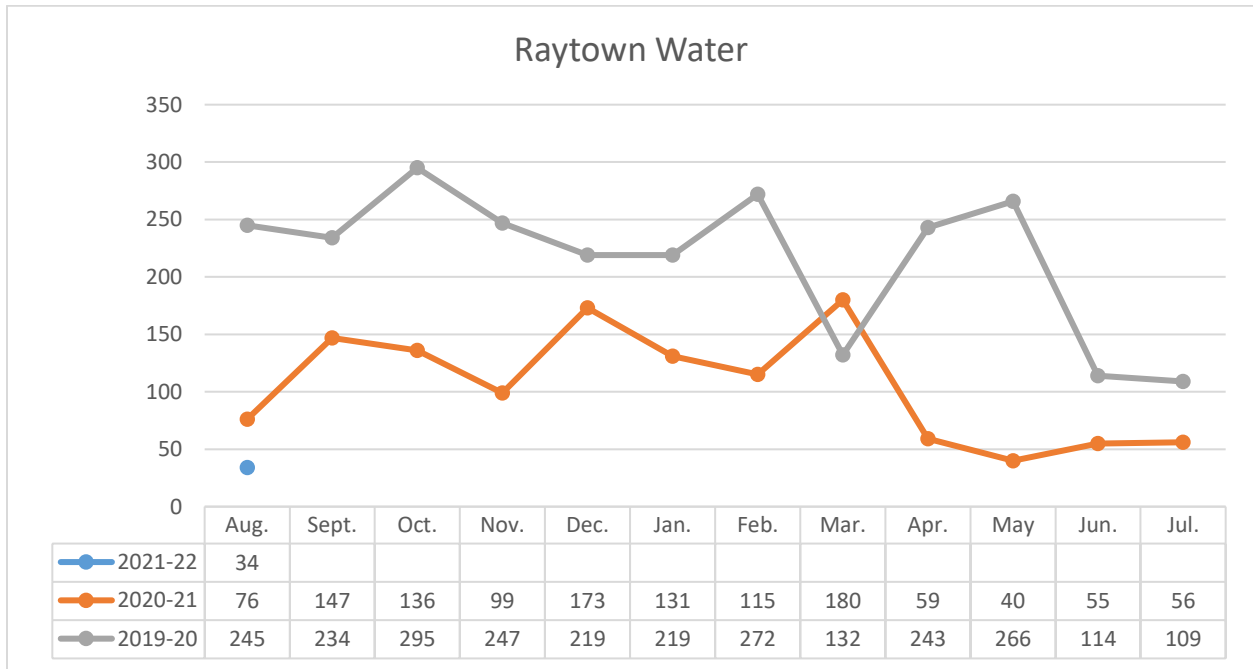
Questions 1 & 3 (Raytown Water)

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



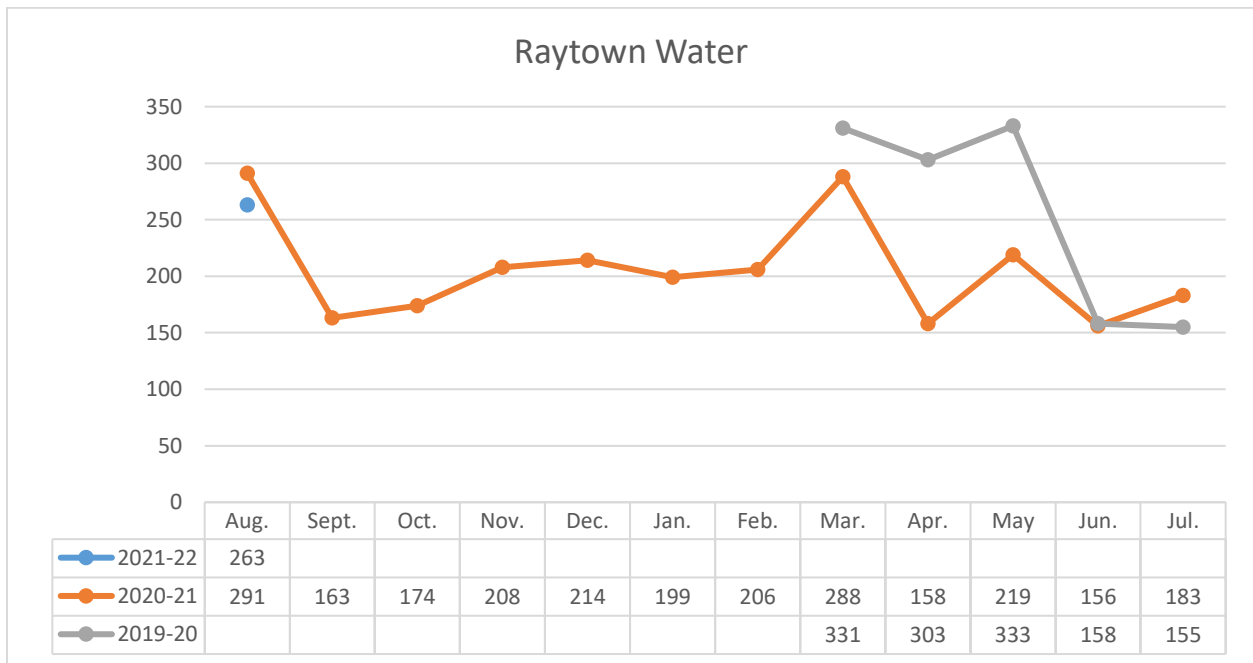
As shown in the previous graph, Raytown Water performed approximately 77% more disconnections for non-payment in August 2021 versus August 2020 and 33% more disconnections for non-payment in August 2021 versus July 2021. The number of actual disconnections by Raytown Water in August 2021 was approximately 55% more than the number projected by Raytown Water for the same month. There were 58% more disconnections in August 2021 versus pre-pandemic, August 2019.

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



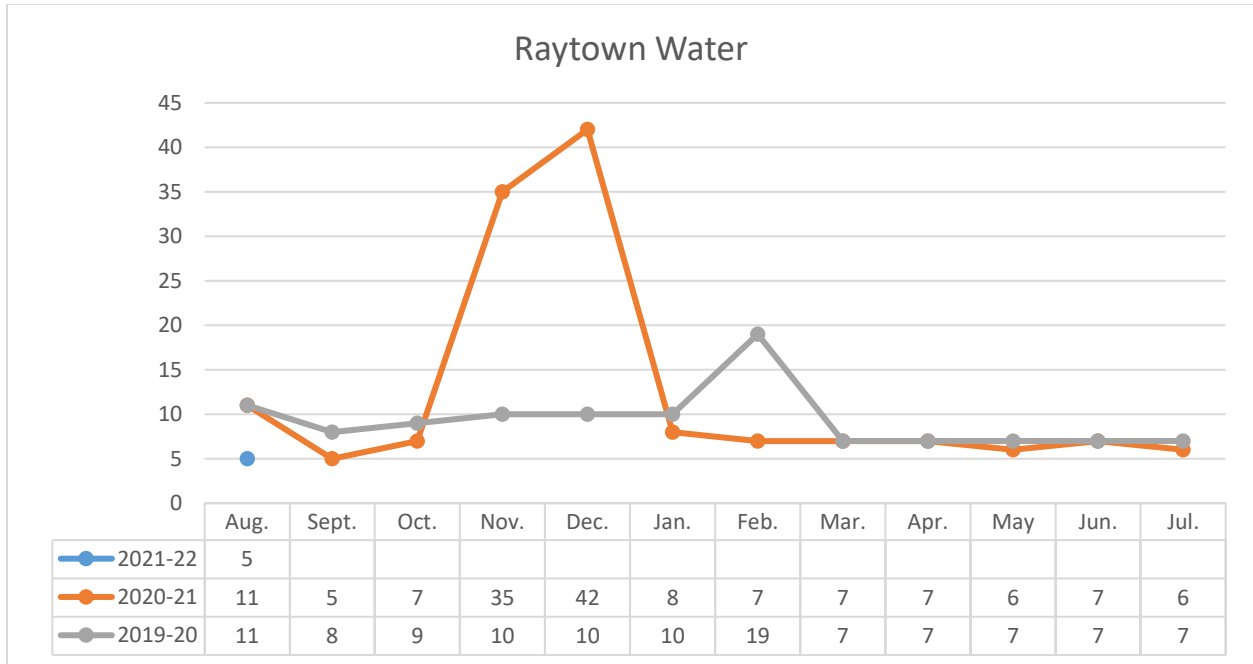
The previous data indicates that there were about 55% fewer Raytown Water customers with past-due accounts in August 2021 versus August 2020 and approximately 39% fewer in August 2021 than in July 2021. There were 86% fewer customers with past due accounts in August 2021 versus pre-pandemic, August 2019. Raytown Water reported that it defines “past due” as accounts with balances that are over 31 days.

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



As shown by Raytown Water’s data, for those customers who received a final disconnection notice there were approximately 10% fewer customers who were not disconnected in August 2021 versus August 2020 and approximately 44% more in August 2021 than in July 2021. Staff is unable to compare August 2021 data to pre-pandemic data as Raytown was unable to provide historical data for August 2019.

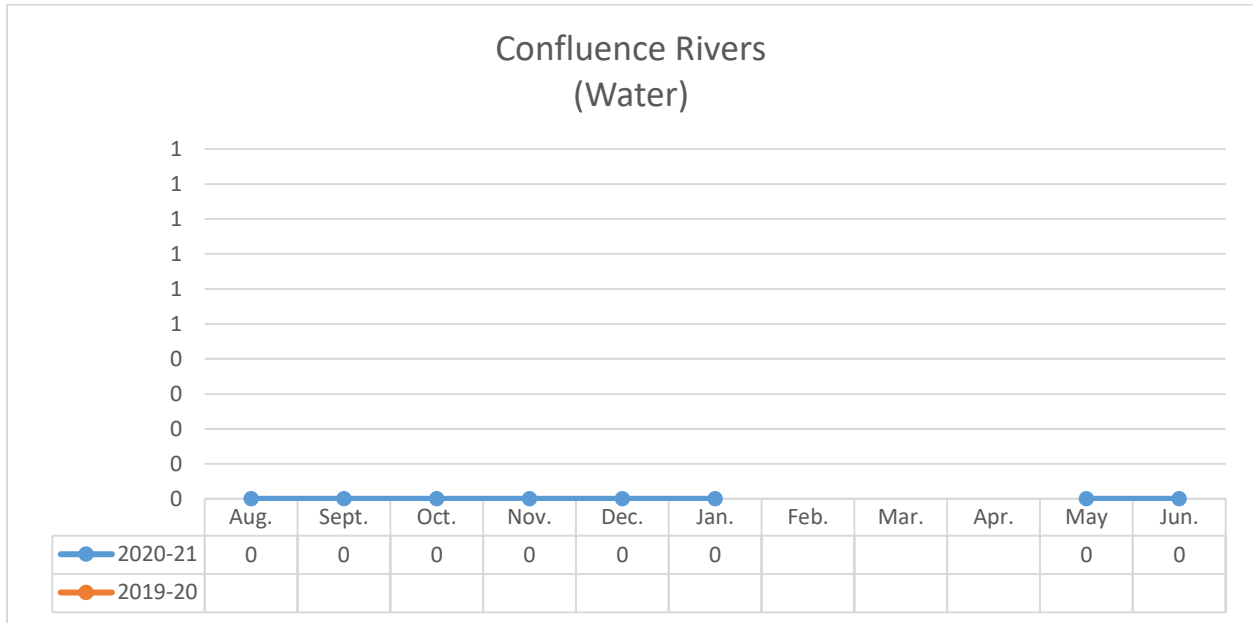
d) The number of customers at each month-end participating in payment plans



The previous graph illustrates that there were 55% fewer customers of Raytown Water who participated in payment plans in August 2021 versus August 2020. There was one fewer customer participating in a payment plan in August 2021 in comparison to July 2021. There were 55% fewer customers participating in payment plans in August 2021 versus pre-pandemic, August 2019.

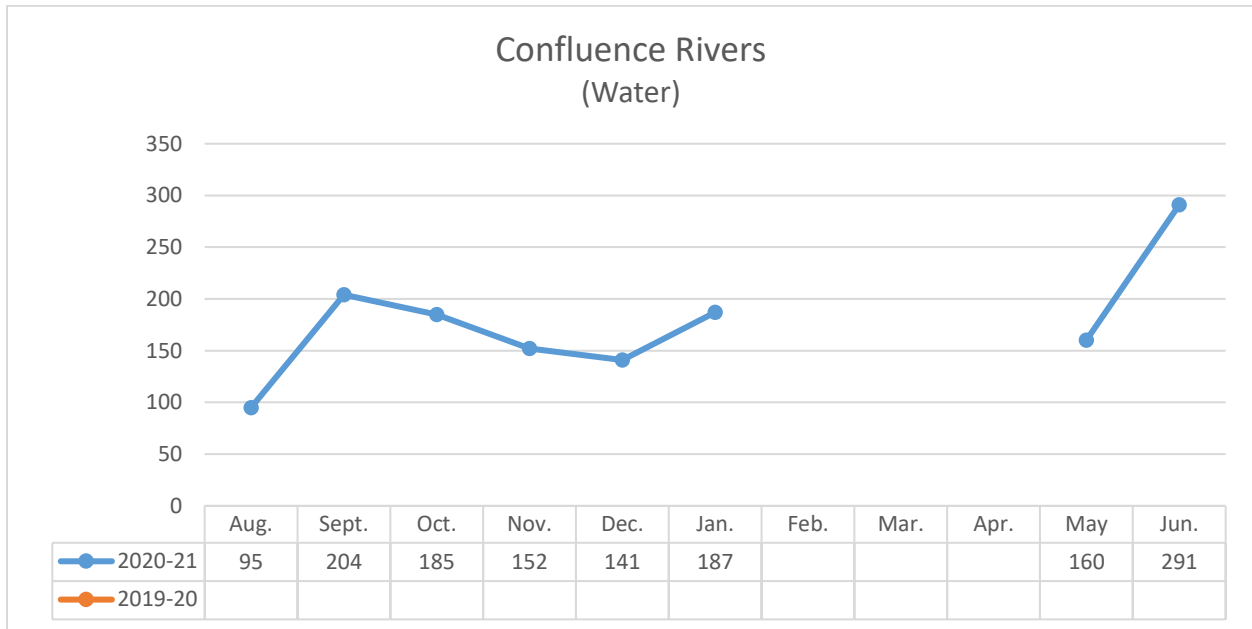
Questions 1 & 3 (Confluence Rivers - Water)

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



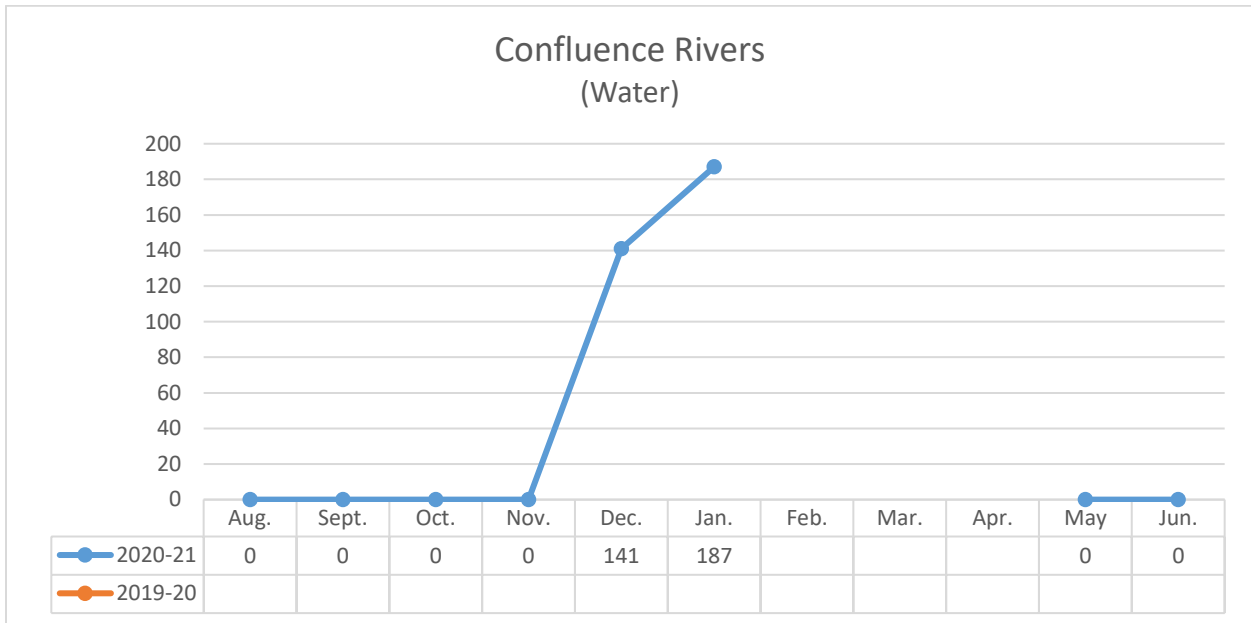
As shown in the previous graph, Confluence Rivers performed no disconnections in May 2021 or June 2021. No monthly, comparative data was provided for August 2019 to June 2020, although a total of 24 disconnections were performed through January 2020. Confluence Rivers does not forecast the number of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



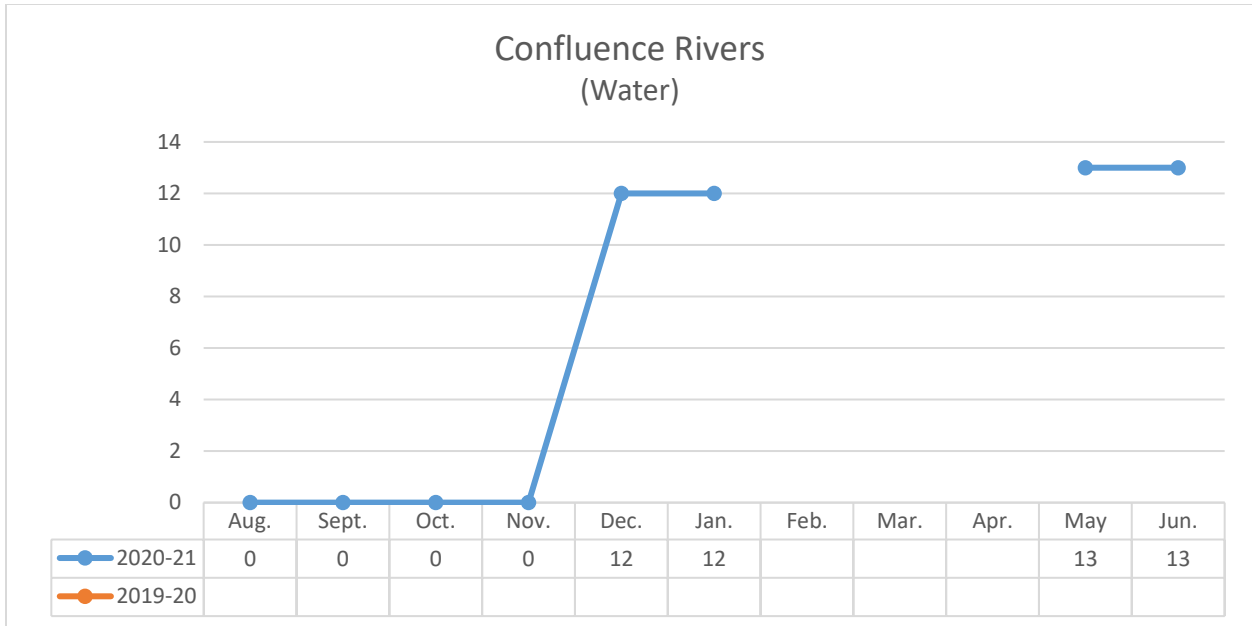
The previous data indicates there were about 82% fewer Confluence Rivers customers with past-due accounts in June 2021 versus May 2021. No monthly, comparative data was provided for August 2019 to June 2020, although there was a total of 37 customers with “past-due” accounts through January 2020. Confluence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

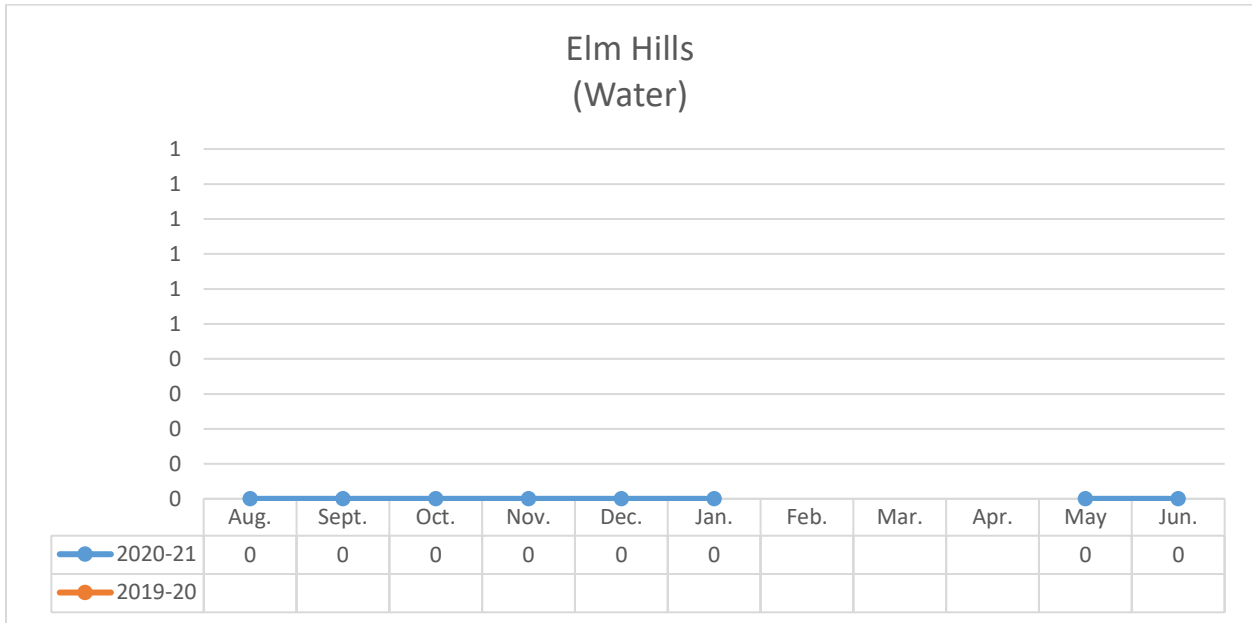
d) The number of customers at each month-end participating in payment plans



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.

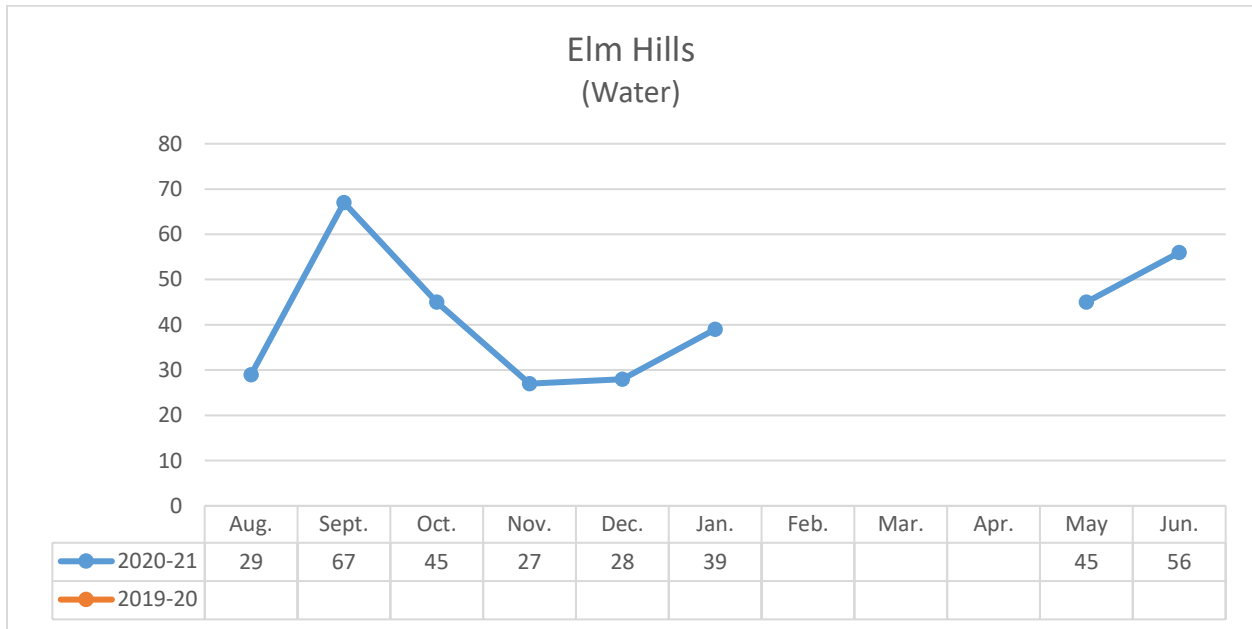
Questions 1 & 3 (Elm Hills - Water)

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



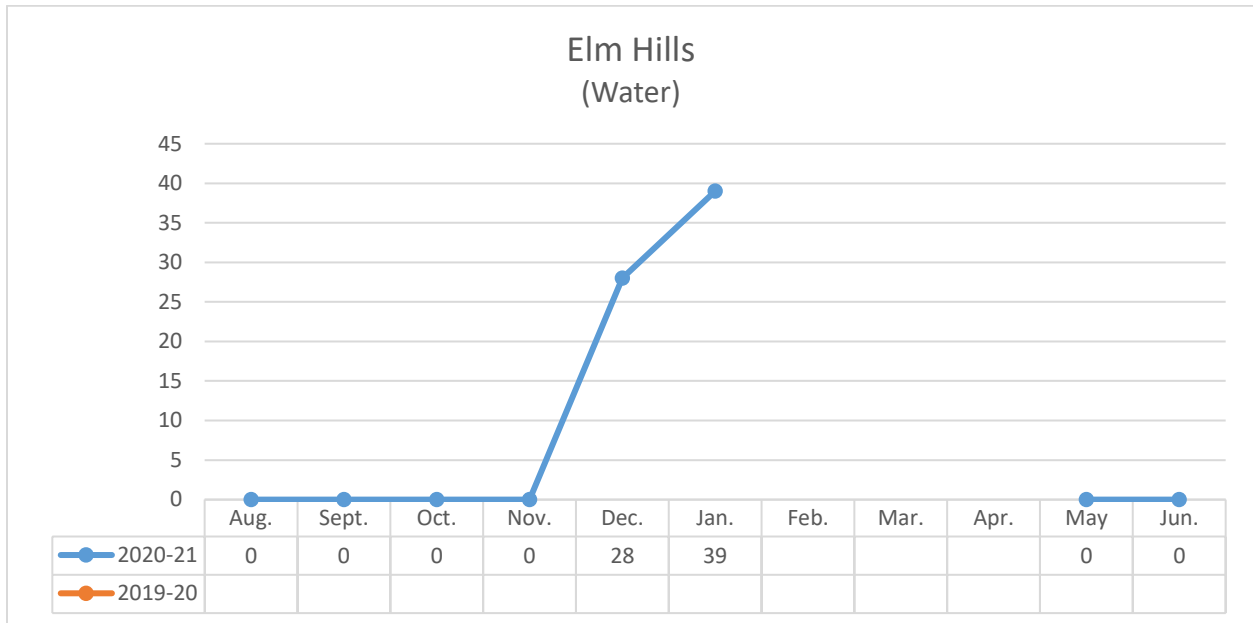
As shown in the previous graph, Elm Hills performed no disconnections in May 2021 or in June 2021. No monthly, comparative data was provided for August 2019 to June 2020, although no disconnections were performed during this time period.

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”



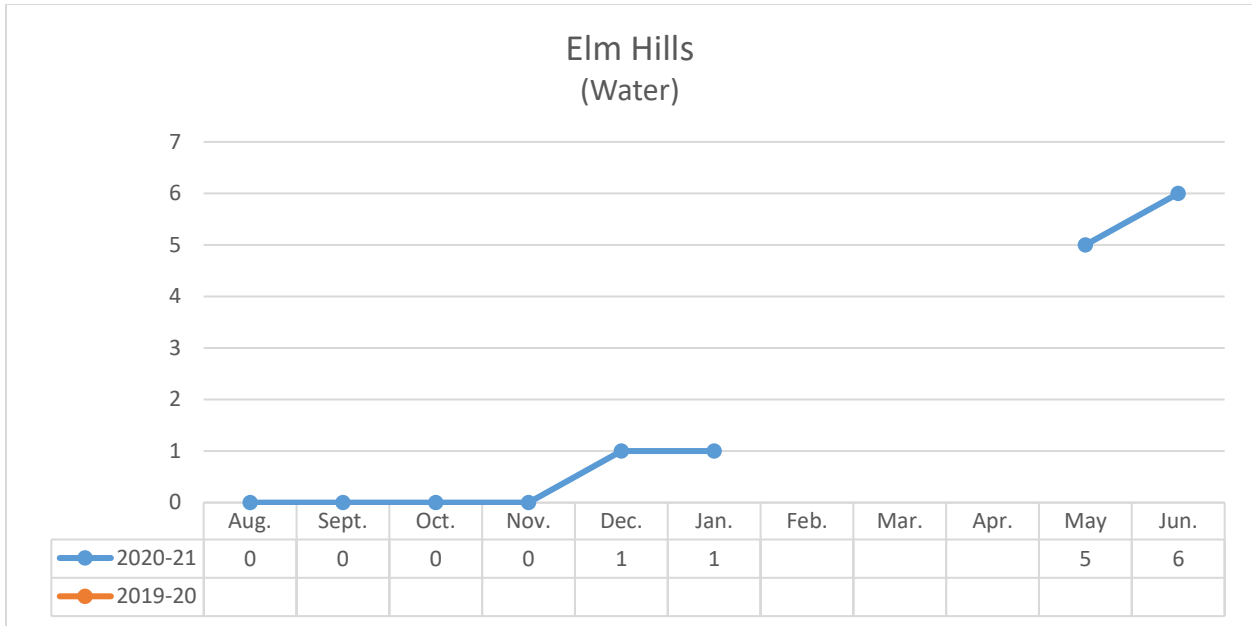
The previous data indicates there were about 24% more Elm Hills customers with past-due accounts in June 2021 versus May 2021. No monthly, comparative data was provided for August 2019 to June 2020, although there was a total of 1 customer with a “past-due” account through January 2020. Elm Hills reported 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.

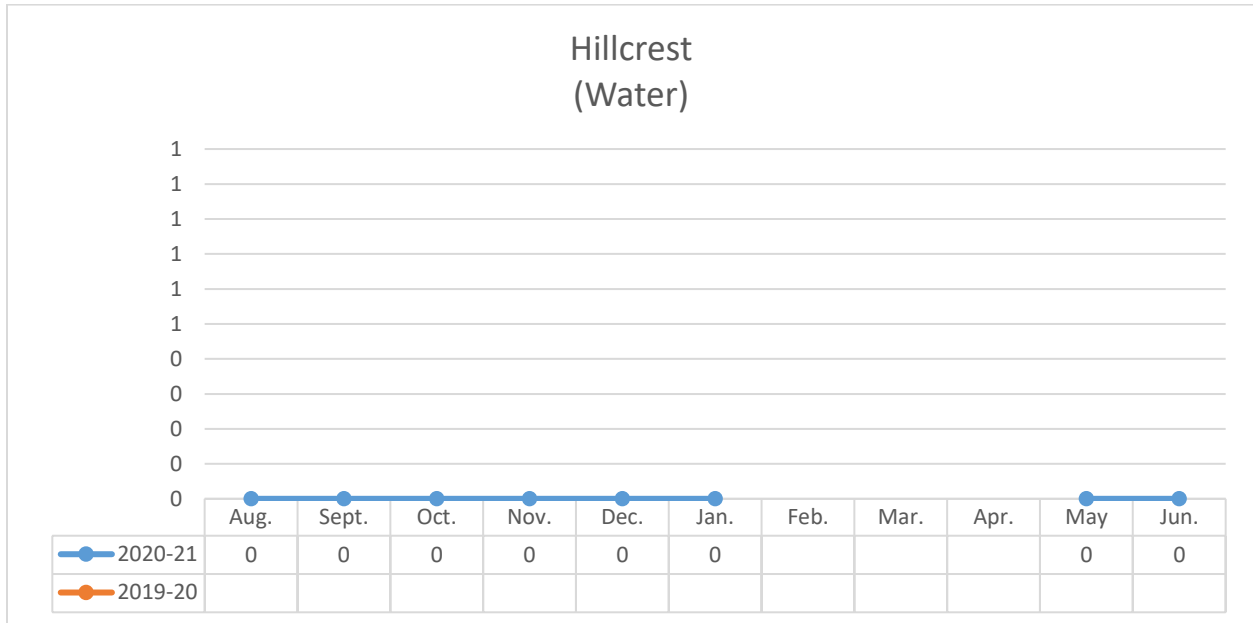
d) The number of customers at each month-end participating in payment plans



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.

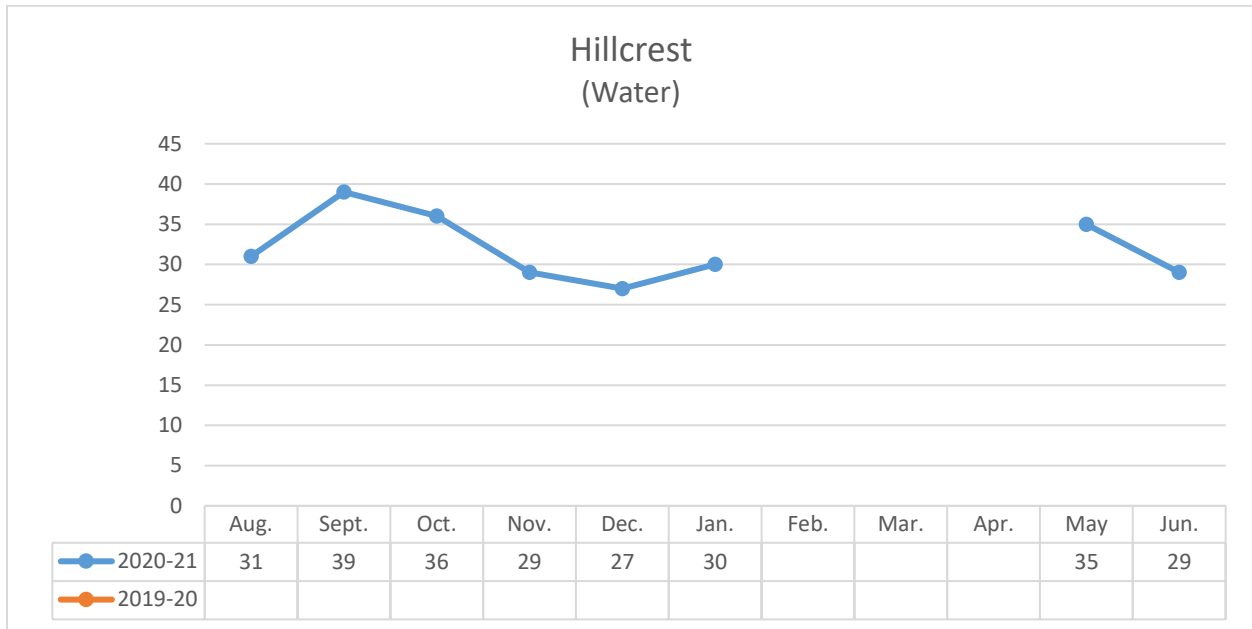
Questions 1 & 3 (Hillcrest - Water)

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



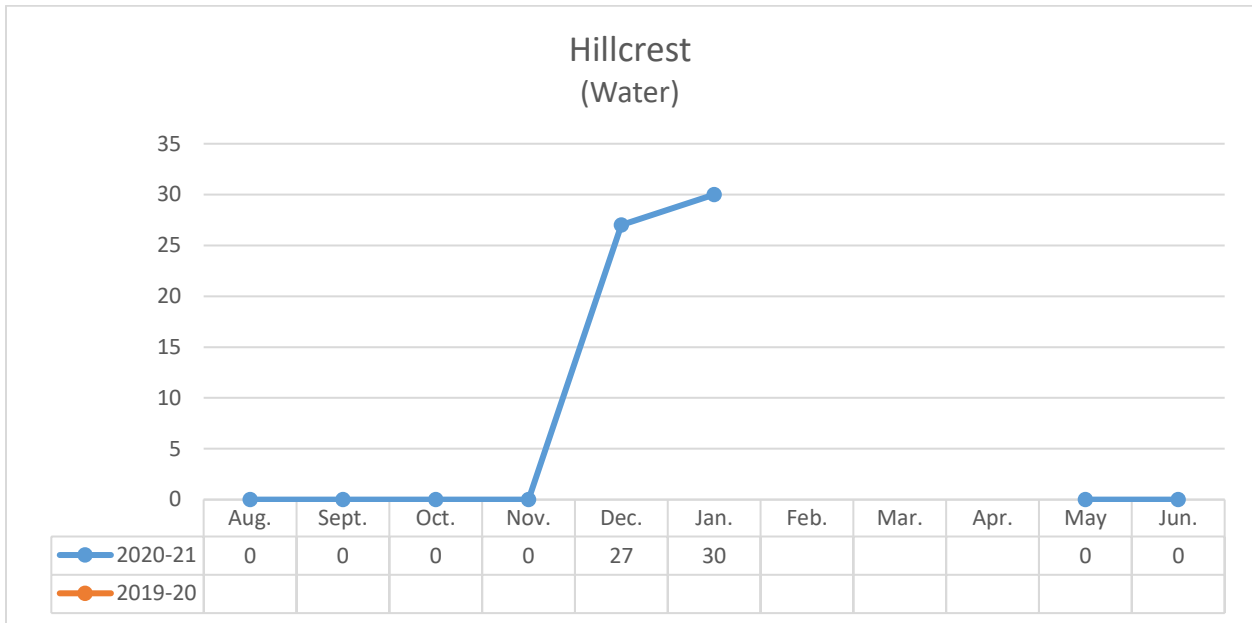
As shown in the previous graph, Hillcrest performed no disconnections in May 2021 or in June 2021. No monthly, comparative data was provided for August 2019 to June 2020, although a total of 12 disconnections were performed through January 2020.

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”



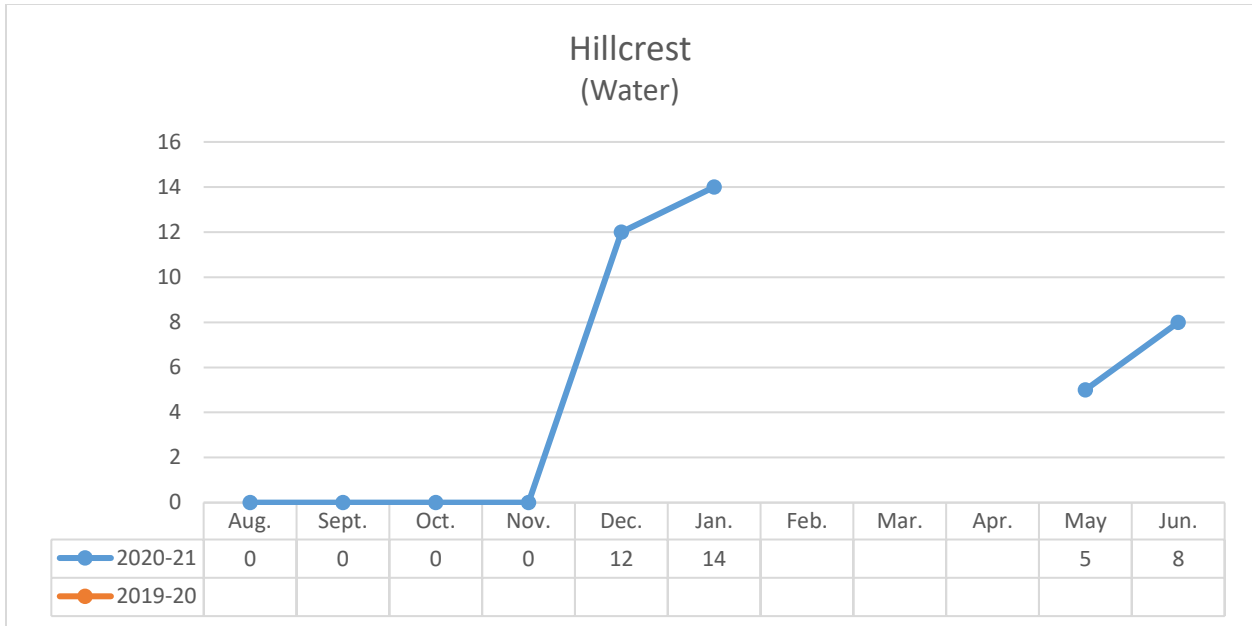
The previous data indicates there were about 17% fewer Hillcrest customers with past-due accounts in June 2021 versus May 2021. No monthly, comparative data was provided for August 2019 to June 2020, although there was a total of 16 customers with “past-due” accounts through January 2020. Hillcrest reported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

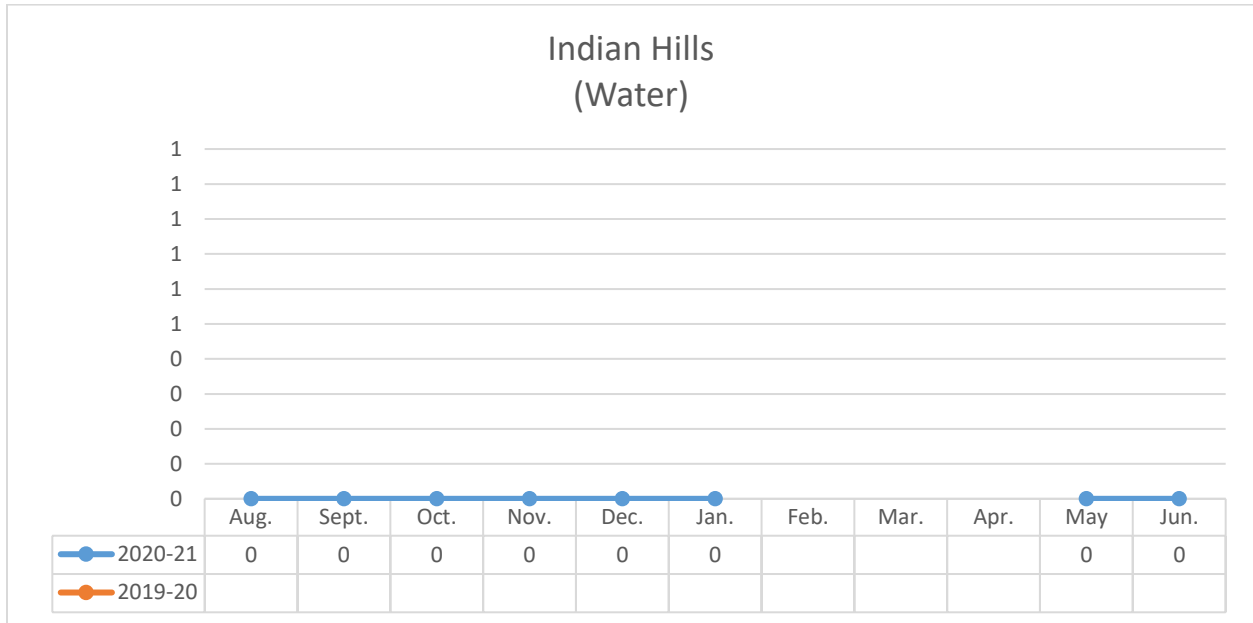
d) The number of customers at each month-end participating in payment plans



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.

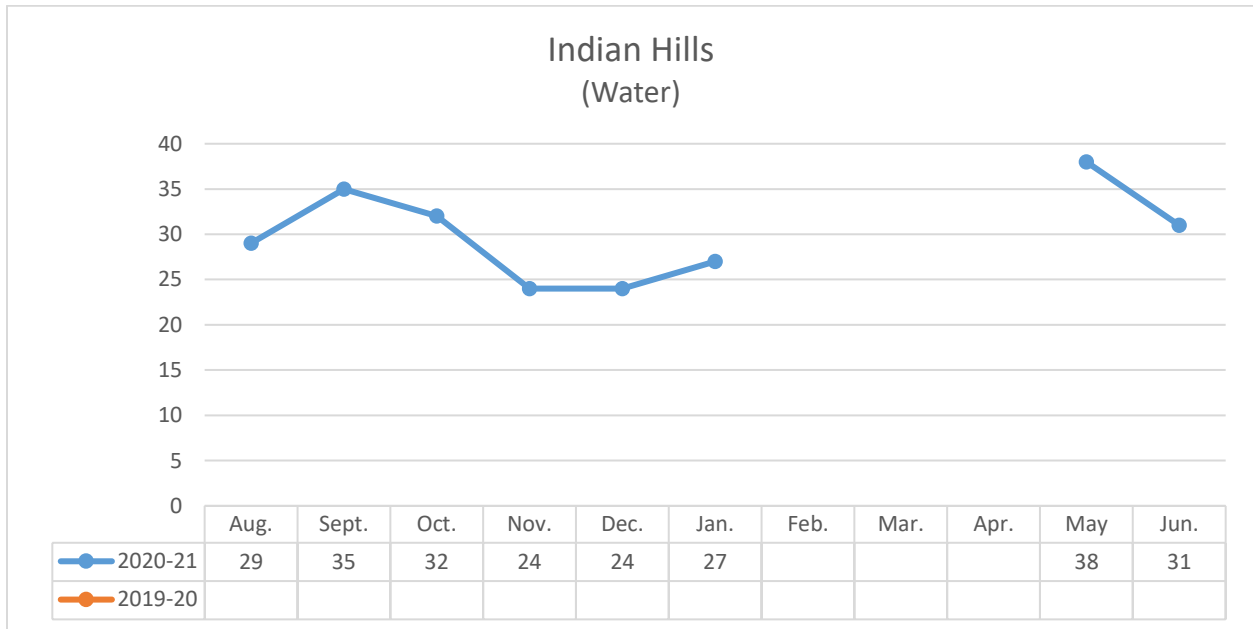
Questions 1 & 3 (Indian Hills - Water)

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



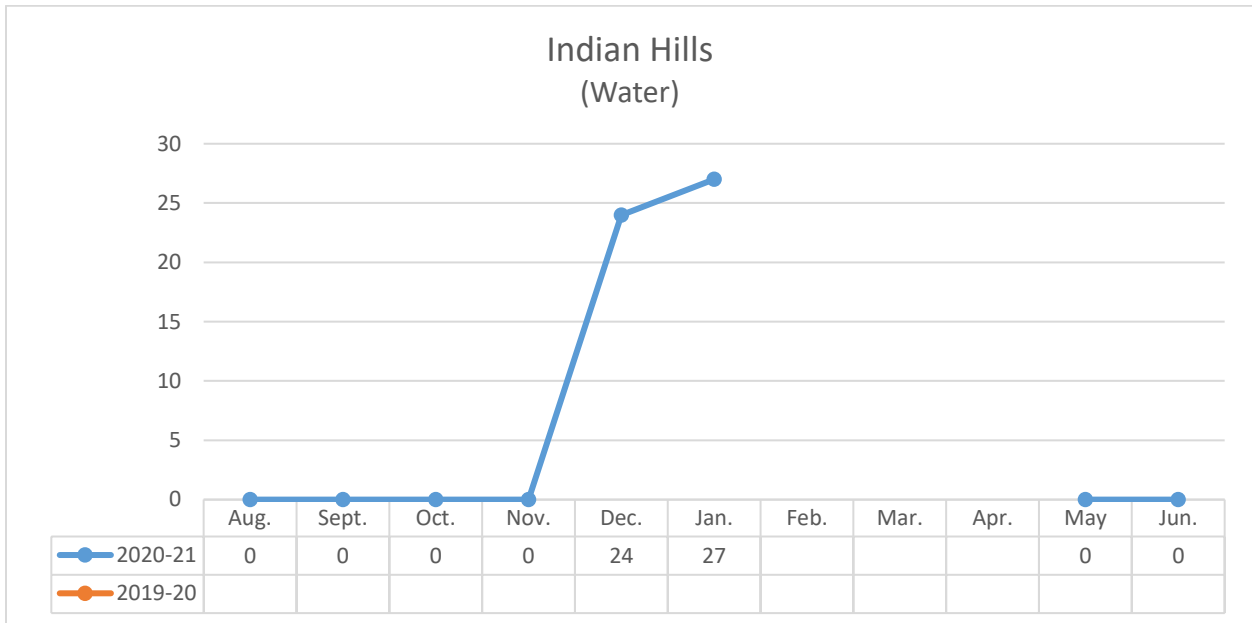
As shown in the previous graph, Indian Hills performed no disconnections in May 2021 or in June 2021. No monthly, comparative data was provided for August 2019 to June 2020, although a total of 6 disconnections were performed through January 2020.

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”



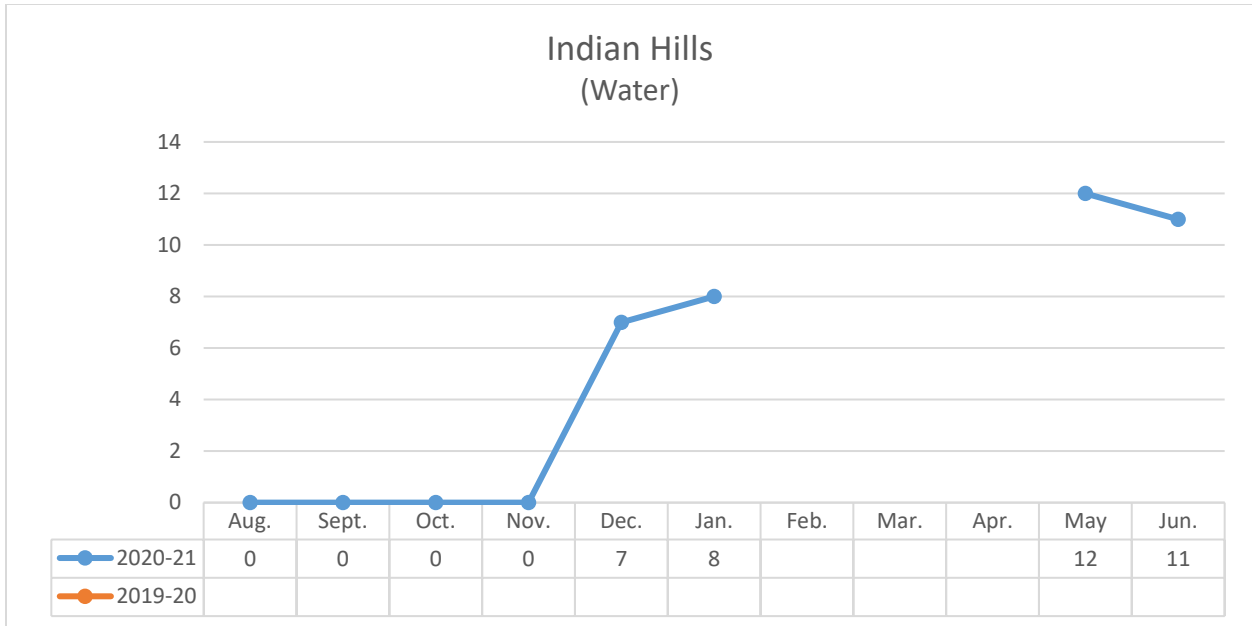
The previous data indicates there were about 18% fewer Indian Hills customers with past-due accounts in June 2021 versus May 2021. No monthly, comparative data was provided for August 2019 to June 2020, although there was a total of 11 customers with “past-due” accounts through January 2020. Indian Hills 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.

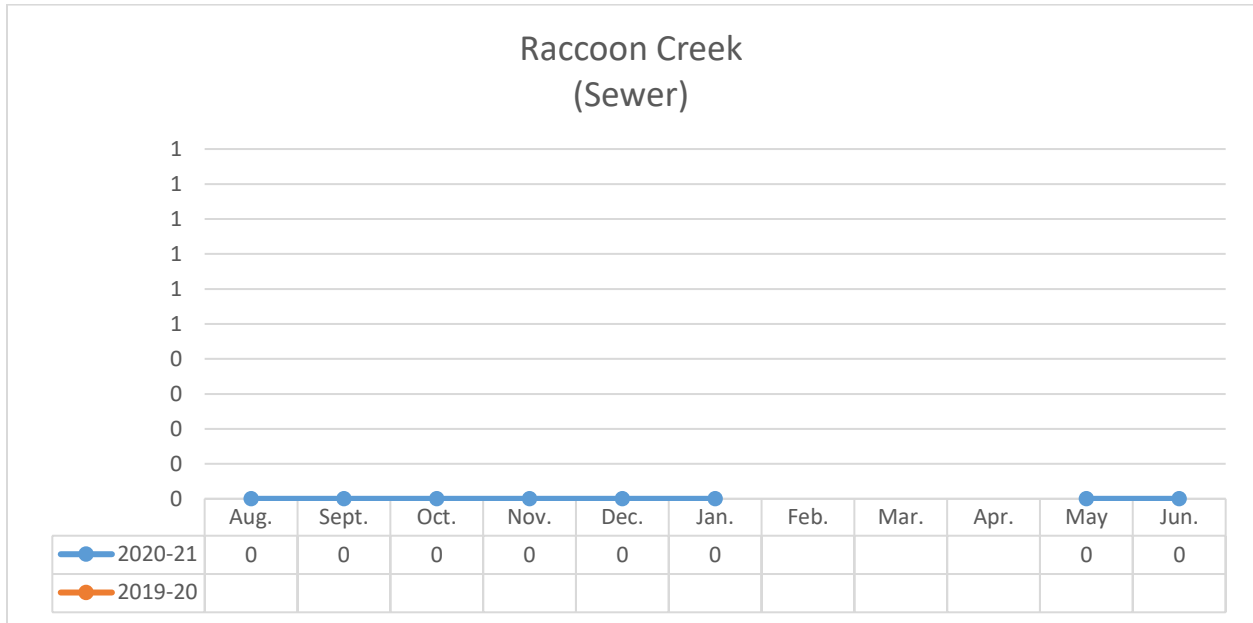
d) The number of customers at each month-end participating in payment plans



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.

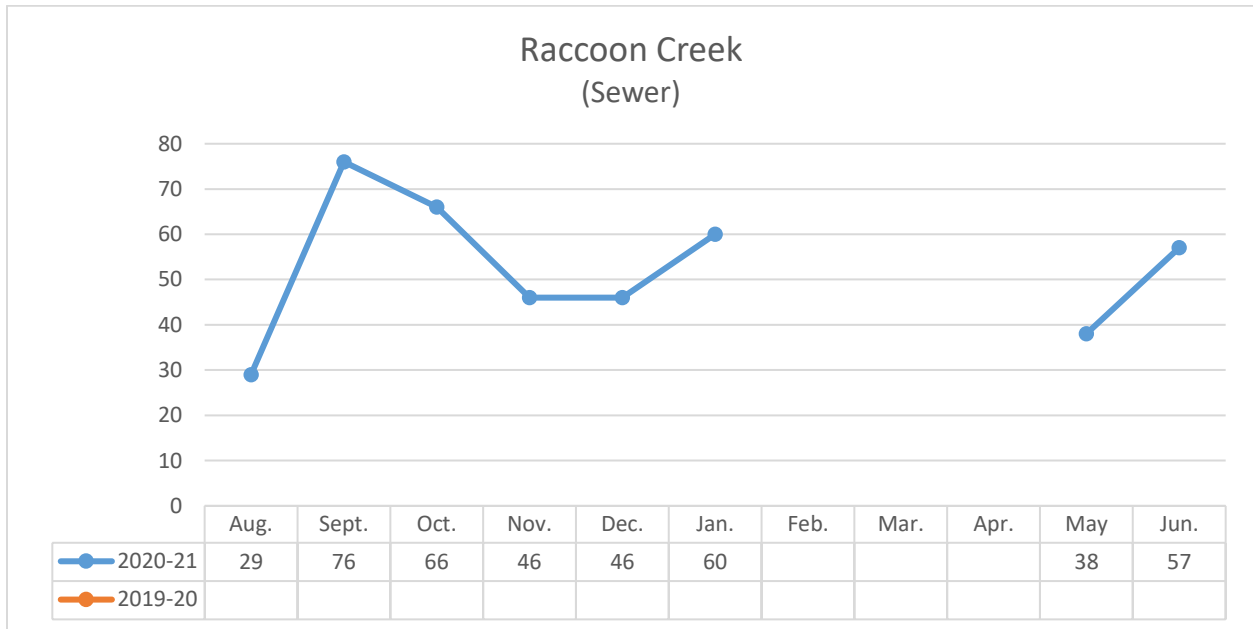
Questions 1 & 3 (Raccoon Creek - Sewer)

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



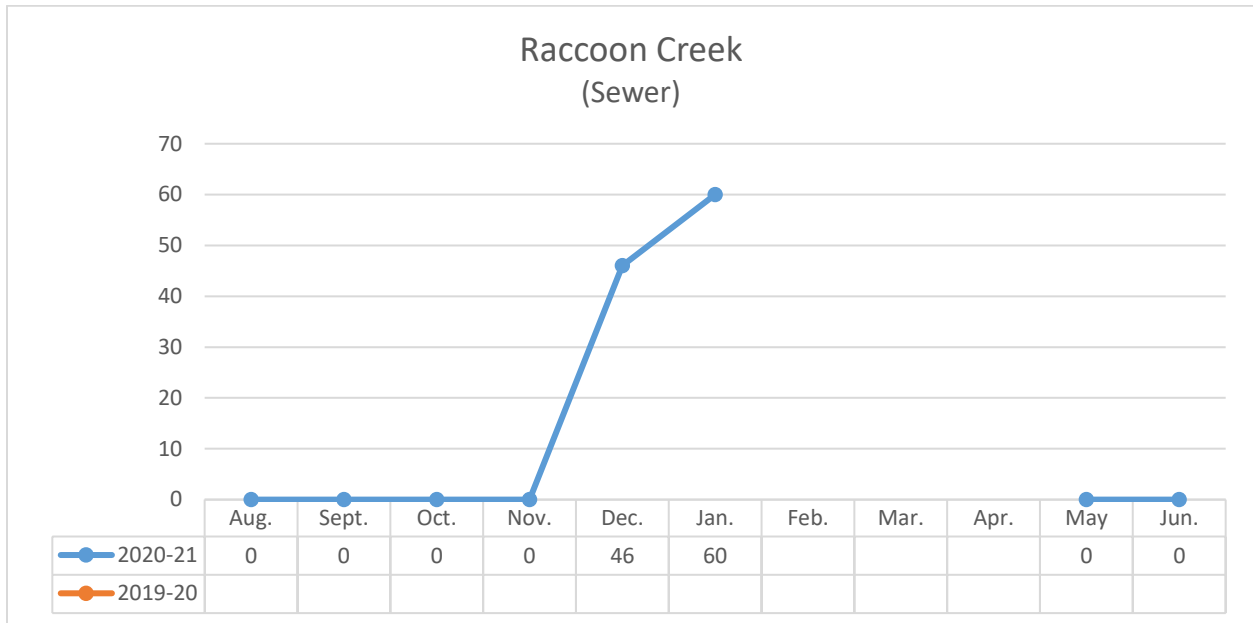
As shown in the previous graph, Raccoon Creek performed no disconnections in May 2021 or in June 2021. No monthly, comparative data was provided for August 2019 to June 2020, although a total of 1 disconnection was performed through January 2020.

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”



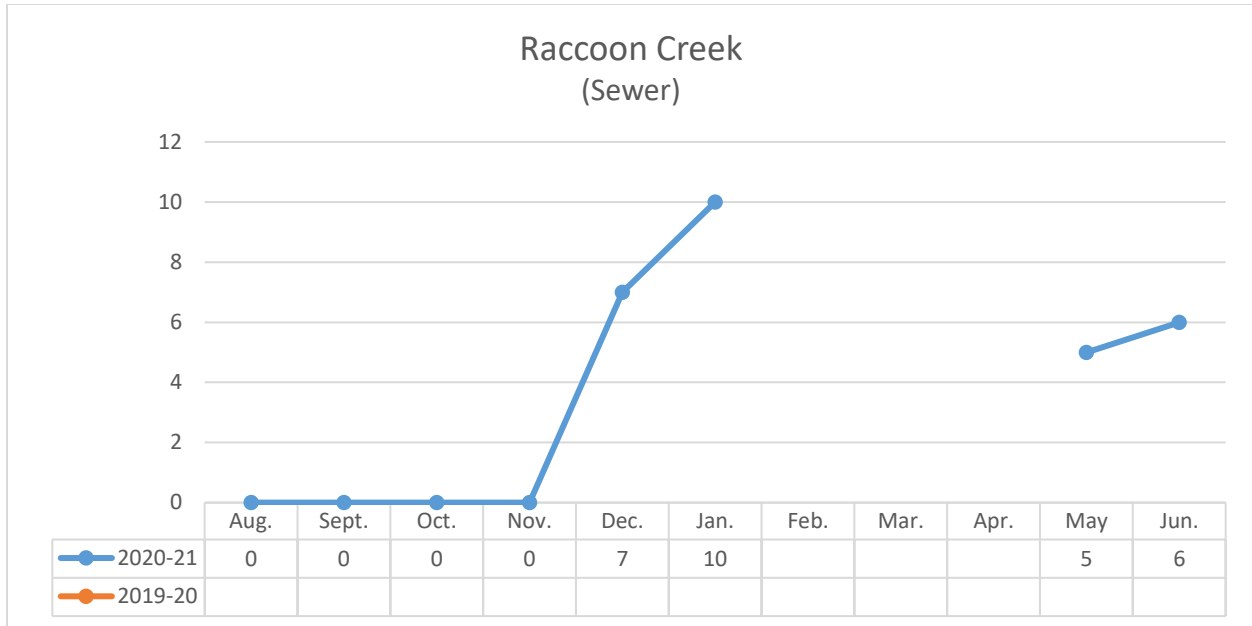
The previous data indicates there were about 50% more Raccoon Creek customers with past-due accounts in June 2021 versus May 2021. No monthly, comparative data was provided for August 2019 to June 2020, although there were a total of 3 customers with “past-due” accounts through January 2020. Raccoon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

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 (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.