

Exhibit:

Issues: AMI meters, customer  
issues, Clean Charge  
Network, TOU

Witness: Charles A: Caisley

Type of Exhibit: Surrebuttal Testimony

Sponsoring Party: Evergy Missouri Metro and  
Evergy Missouri West

Case No. ER-2022-0129 / 0130

Date Testimony Prepared: August 16, 2022

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO.: ER-2022-0129 / 0130**

**SURREBUTTAL TESTIMONY**

**OF**

**CHARLES A: CAISLEY**

**ON BEHALF OF**

**EVERGY MISSOURI METRO and EVERGY MISSOURI WEST**

**Kansas City, Missouri  
August 2022**

## **Table of Contents**

1	I. INTRODUCTION .....	1
2	II. CLEAN CHARGE NETWORK .....	2
3	III. CUSTOMER EXPERIENCE .....	3
4	IV. TOU RATES AND CUSTOMER RATE CHOICE.....	17
5	V. CRITICAL NEEDS AND REHOUSING PILOT PROGRAMS .....	22
6	VI. AMI METERS.....	23
7	VII. ALLEGED CONFLICT OF INTEREST.....	24

**SURREBUTTAL TESTIMONY**

**OF**

**CHARLES A. CAISLEY**

**Case No. ER-2022-0129 / 0130**

1

**I. INTRODUCTION**

2 **Q: Please state your name and business address.**

3 A: My name is Charles A. Caisley. My business address is 1200 Main, Kansas City, Missouri  
4 64105.

5 **Q: Are you the same Charles A. Caisley who submitted direct and rebuttal testimony in**  
6 **these dockets?**

7 A: Yes.

8 **Q: On whose behalf are you testifying?**

9 A: I am testifying on behalf of Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy  
10 Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy  
11 Missouri West”) (collectively, the “Company” or “Evergy”).

12 **Q: What is the purpose of your surrebuttal testimony?**

13 A: The purpose of my surrebuttal testimony is to respond to several witnesses’ rebuttal  
14 testimonies on the following subject matters:

- 15
- Clean Charge Network
  - 16 • Customer Experience
  - 17 • Time of Use (“TOU”) rates and Customer Rate Choice
  - 18 • Critical Needs and Rehousing Pilot Programs
  - 19 • Advanced Metering Infrastructure (“AMI”)

- Alleged Conflict of Interest

## II. CLEAN CHARGE NETWORK

**Q: Do you agree with the Office of Public Counsel (“OPC”) witness Marke’s rebuttal testimony stating the Clean Charge Network is “a textbook case for failed adoption”<sup>1</sup>?**

**A:** Not at all. My rebuttal testimony detailed both the fatal errors in Dr. Marke’s analysis and the ongoing role of Evergy’s Clean Charge Network to support Evergy customers.

**Q: Why does OPC witness Marke refer to Evergy’s proposed Commercial EV Charger Rebate Program (“CRP”) as an expansion of the Clean Charge Network (“CCN”)?**

**A:** I cannot say. Dr. Marke’s characterization is particularly inexplicable given that Evergy and OPC actively engaged in discussions related to this very program for much of last year. At one point, Dr. Marke’s testimony describes the CRP as “rebates to third-party electric vehicle (“EV”) charge station providers”<sup>2</sup>. While this description suggests that Dr. Marke understands the CRP will generate charging stations that are not part of Evergy’s owned and operated CCN and Evergy is not requesting that any part of the CRP be rate based, Dr. Marke’s testimony nevertheless refers to the proposed rebate program repeatedly as an “expansion” of the CCN.

To be clear, this filing does not include a proposal to expand the CCN by raising the jurisdictional caps on the number of stations allowed within the Clean Charge Network. Such a request was included in File Nos. ET-2021-0151/0269 and was approved by the Commission as detailed in my rebuttal testimony.

---

<sup>1</sup> Marke Rebuttal, Page 41, Line 15

<sup>2</sup> Marke Rebuttal, Page 41, Line 10

1 **III. CUSTOMER EXPERIENCE**

2 **Q: How do you respond to OPC witnesses’ (Dr. Marke and Ms. Kremer) view of**  
3 **customer experience and the difference between customer need and choice?**

4 A: Evergy agrees that customers need safe, reliable, and affordable power. In addition,  
5 customers need a way to engage with their utility to start service, consume the bill, make  
6 payments and arrangements, and get questions answered on usage, rates, etc. Interaction  
7 with their utility is an example of how customers can have choice with their utility. Both  
8 Dr. Marke and Ms. Kremer mention customer use of Interactive Voice Response (“IVR”)  
9 technology and online interactions and the concern that customers prefer the human touch.

10 There is value in providing a variety of ways to interact with a business to meet the  
11 many needs of different types of customers. For example, through July 2022, over 60% of  
12 our customer calls were handled daily via the Intelligent Voice Assistant (“IVA”), which  
13 is not mandated by Evergy, but is by customer choice. In addition, approximately 79% of  
14 our customer payments are through digital channels and thanks to new functionality on  
15 both the web and IVA since the Customer Forward implementation, approximately 80%  
16 of payment arrangement enrollments happen through self-service channels. Even with the  
17 rise in self-serve adoption, Evergy realizes there are some customers and even certain  
18 situations when customers want to speak to a customer service representative (“CSR”). As  
19 noted in previous testimony, speaking with a CSR will always be an option for Evergy  
20 customers.

21 In addition, Evergy was an industry leader in realizing the importance of working  
22 with customers one-on-one and face-to-face. In 2018, it opened Connect, which provides  
23 customers the opportunity to meet face-to-face with Evergy to resolve a myriad of issues.

1 The Connect team has helped thousands of customers avoid disconnections and enroll in  
2 energy efficiency, payments assistance programs and medical programs. The Kansas City  
3 Connect has impacted many customers through:

- 4 • Helping more than 31,000 customers with direct and customized service
- 5 • Stopping more than 1,000 disconnections with proactive assistance.
- 6 • Enrolling nearly 2,000 customers in energy efficiency, payments assistance and  
7 medical programs.
- 8 • Functioning as a venue for nearly a hundred community events/meetings,  
9 workshops, assistance outreach and workforce/career events.

10 Our customer representatives work with customers to establish payment plans and  
11 direct them to payment resources.

12 I stress the point that there is not just one way to work with customers – completing  
13 transactions digitally, speaking directly with a CSR on phone, working through an IVA or  
14 meeting with an Evergy team member face-to-face are all important and meaningful ways  
15 to engage.

16 **Q: In Dr. Marke’s rebuttal testimony he claims to be puzzled by your testimony that**  
17 **customers prefer choice and judge customer service through a broader lens than just**  
18 **comparable utility service. Can you assist Dr. Marke by clarifying your comments**  
19 **and assist in his comprehension of your point?**

20 **A:** I will certainly try. First, I never claimed Evergy was not a “natural monopoly.” In fact,  
21 that monopoly status is exactly the reason why that it is important for us to give customers  
22 a choice. Our rate case filing and our customer service guiding principles are replete with  
23 efforts to offer customers choices. If a customer cannot choose its utility provider, then a

1 utility provider should do its utmost to provide its customers with choices around service  
2 within the context of its monopoly status. A customer that can tailor its electrical service  
3 in areas that are important to him or her are generally more satisfied. Evergy offers choices  
4 in multiple areas, to name a few key areas:

- 5 • Billing: a customer can receive mailed, emailed, or portal and text alerts.
- 6 • Rates: we are proposing a myriad of rates for residential customers in optimize their  
7 rate to best fit their lifestyle.
- 8 • Customer service: we offer online portals, are developing a next generation mobile  
9 app for release later in 2022, we have an IVA, a customer call center, social media,  
10 email and text options, and we have a walk-in Connect center for those who prefer  
11 in-person interactions. This is all to allow customers to choose how they want to  
12 interact, communicate with and receive their customer service from us.
- 13 • Energy efficiency and demand response programs: these provide customers a  
14 choice in how they actually use and manage their energy usage.
- 15 • Renewable energy programs: these allow customers choice in their level of  
16 sustainability and increased ability to choose where their energy comes from and  
17 how it is made.

18 What I find puzzling is why a senior member of the state entity with the  
19 responsibility for representing residential consumers does not understand why customers  
20 of a “natural monopoly” would not feel better served if they had choices from that service  
21 provider and were not just forced into a one size fits all, the state of Missouri knows best  
22 customer service rubric. Yet, that is exactly what Dr. Marke and OPC witnesses advocate  
23 for in this case. They want to restrict and prohibit choice in rates. They offer no substantive

1 analysis, peer findings or evidence other than their “expert” opinion that rate choice would  
2 harm customers. They just make that unsupported assertion and advocate for not allowing  
3 choice in rates. Rather, they would substitute their own judgment on rates and not only  
4 prevent customers from having a choice, but mandate all residential customers without an  
5 opt-out into mandatory TOU rates.

6 In this way, OPC is acting more like a natural state monopoly than Evergy.  
7 Evergy’s rate choice options are mostly pilots. Customers can choose to try them out.  
8 And, they can choose to withdraw from them. OPC’s recommendation is to force  
9 customers into a one-size-fits all rate that requires more effort not less, more financial risk  
10 and without almost any evidence to support that it would be beneficial for customers or  
11 that customers are in favor of it.

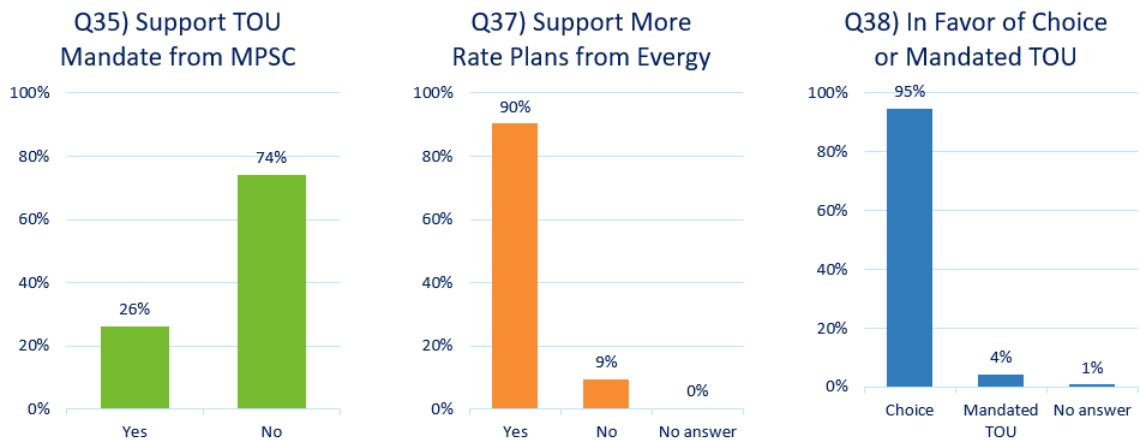
12 Conversely, Evergy favors giving customers more choice generally and more  
13 choice with respect to the rates. This is supported by voluminous research and study  
14 conducted over more than a year by Evergy and filed as part of this case. It is supported  
15 by industry research conducted by J.D. Power & Associates, the Cogent Trusted Brand &  
16 Customer Engagement study, and by eSource. And, it is augmented by ongoing customer  
17 research conducted by Evergy.

18 In June of 2022, Evergy conducted a survey of its online panel of customers to  
19 update our rate choice research. This survey is attached to my Direct Testimony as  
20 **Confidential Schedule CAC-5**. This was an online panel of nearly one thousand Missouri  
21 residential customers. Results show that customers are interested in more rate options.  
22 90% said Evergy should offer more rate plans (just 9% said no), and 52% said if more rate  
23 options were available, they would very likely consider changing rate plans. In addition,



1 this survey also gauged residential customer perspectives of the possibility of mandating  
2 TOU for all Missouri customers by the Missouri Public Service Commission (“MPSC”).  
3 Nearly three-quarters of all respondents said they did not support this move by the MPSC,  
4 and fully 95% said they preferred that customers have the ability to choose the rate plan  
5 that is best for them. If all Missouri customers were required to switch to a TOU plan,  
6 satisfaction with both Evergy and the MPSC would fall.

*Most would not support mandated TOU rate, want choice of rates*



7  
8 In addition, Dr. Marke gratuitously states with no corresponding evidence to  
9 support, “If customers did judge Evergy’s customer service relative to other utilities they  
10 would likely be very disappointed.” This statement is augmented with the footnote: One  
11 can draw their own conclusions as to whether or not customers would stay with Evergy if  
12 they had a choice for other options like what is commonplace in “the market.” Luckily for  
13 Dr. Marke, we do not have to draw our own conclusions, there is third-party empirical  
14 evidence directly on point. According to the full year Cogent Trusted Brand & Customer  
15 Engagement study for 2021, Evergy residential customers are no more likely to switch  
16 electric utility providers than the average Midwest utility. This study reports that if Evergy  
17 customers had the ability to choose another viable electric provider only 46% would

1 consider doing so, with just 6% stating they would be very likely to switch to another  
2 provider. The same study reports that the Midwest average for switching to another  
3 provider is 46%, with 8% stating they would be very likely to switch providers. In the  
4 same study, 38% of Ameren Missouri customers and 45% of Ameren Illinois customers  
5 reported they would potentially switch providers, with 8% of Ameren Missouri customers  
6 very likely to switch. For Spire West Missouri, the comparable number is 44% and for  
7 Spire East Missouri it is 46%, with 8% and 7% respectively very likely to switch. In other  
8 words, despite Dr. Marke's conjecture that Evergy customers would be likely to switch  
9 providers if they had a choice, that is not the case for the majority of Evergy customers.  
10 Further, Evergy's performance in this area is not out of line with our Midwest peers and  
11 does not materially differ from our Missouri peers.

12 Dr. Marke predicates this unfounded assertion on Evergy's J.D. Power scores.  
13 However, his rebuttal testimony on J.D. Power is outdated and incorrect. In addition, in  
14 the areas of customer service and experience, both J.D. Power and Cogent score Evergy  
15 above the Midwest utility average. I will address this further later in my testimony.

16 Moreover while, I agree that Evergy holds a monopoly on the generation and sale  
17 of electricity within its regulated jurisdictions, as Missouri is not a deregulated state,  
18 customers do have a growing choice in how they choose to use electricity, how they engage  
19 with us and how they may receive energy.

20 Over the past decade, electricity has increasingly become more competitive. There  
21 are many factors that contribute to that. For example, large customers are seeking ways to  
22 meet their sustainability goals; solar and storage are becoming more cost competitive with  
23 the cost of electricity and increasing customer options; or companies are approaching

1 customers to partner with them on bidding energy into the wholesale market, providing  
2 renewable energy credits, or managing their electric bill. These are only a few examples  
3 of how customers are faced with choice but are not regulated directly by a commission.  
4 Evergy must provide choice to its customers to stay relevant and meet customer needs.  
5 Customers do have options to replace Evergy; just not in the myopic and traditional sense  
6 that Dr. Marke refers.

7 Finally, I would like to clarify my testimony regarding the context through which  
8 customers judge customer service. When I stated that customers judge customer service,  
9 not just by their experience with utility service providers, but by what they experience in  
10 the broader marketplace, it was meant to simply convey that customers don't have a  
11 separate set of expectations for utilities and banks and retailers and auto dealerships. They  
12 don't categorize their customer experience by industry. They have a general perception of  
13 what good customer service looks like informed by all their interactions with companies.  
14 Therefore, while it is important to know how Evergy is performing relative to its peers,  
15 that should not be the only frame of reference when deciding how best to approach and  
16 improve customer experience. Rather, we should look to a broader set of industries and  
17 companies to understand what our customers expect and value.

18 In fact, most of our industry best-practices for customer experience and service  
19 today, originated in other industries first. Authenticated portals, social media used for  
20 communication and customer service, chat, text and a myriad of other practices all  
21 originated in other industries first, became increasingly commonplace and were adopted  
22 by utilities because customers began to expect them from their experience outside of  
23 utilities.

1 **Q: What is your response to Dr. Marke’s rebuttal testimony regarding J.D. Power and**  
2 **customer experience?**

3 A: As stated previously in my testimony, Dr. Marke’s testimony in this area is not current and  
4 it is not informed. First, historically, KCP&L has had solid performance (first and second  
5 quartile performance) in J.D. Power surveys. However, Evergy is a newly formed  
6 company, comprised of two neighboring electric utilities. Since that merger, Evergy J.D.  
7 Power performance has not been as good. This is not because customer service has  
8 declined. In fact, Evergy customer service has enhanced capabilities and platforms relative  
9 to KCP&L. Rather, it is for a host of reasons originating with the merger that have  
10 significantly and negatively put Evergy’s performance on J.D. Power in a hole. These  
11 factors include:

- 12 • **Merger process:** Both legacy company brands suffered reputational damage as a result  
13 of a long, protracted and contentious process for transaction approval. For more than  
14 two years there was significant media coverage, often negative during the process to  
15 obtain regulatory approval.
- 16 • **Brand equity:** KCP&L had more than 130 years of customer recognition and brand  
17 equity in its name. And, Westar had more than 25 years of brand equity behind its  
18 name. When the new company was named all of that equity was erased. Evergy spent  
19 very little in advertising to drive new brand equity. Rather, Evergy spent just enough  
20 on advertising to ensure that customers would not mistakenly throw away their Evergy  
21 bills. J.D. Power surveys repeatedly show significant decreased performance when a  
22 company changes its name.

- 1       • **Differential in J.D. Power performance:** Historically, there was a significant  
2 differential in performance on J.D. Power between KCP&L and Westar. At the time  
3 the merger was announced, KCP&L was in the top half of the first quartile and Westar  
4 was ranked next to last. Now, those scores are averaged under the Evergy brand and  
5 that had an immediate negative effect on the overall company score simply through  
6 averaging the legacy company's performance. This was an immediate change despite  
7 the fact that day one the two companies became Evergy and there was no day one  
8 change in service. That performance variance remains to this day, however, the  
9 differential has narrowed considerably.
- 10       • **Multiple jurisdictions:** Evergy has four service territories operating under one brand  
11 in the same media market. This exaggerates the perceived frequency of rate increases.  
12 Every time there is a rate increase for an individual service territory, the resulting media  
13 coverage creates the perception it is an increase for everyone. The same can be said  
14 for adjustments to the fuel adjustment clause and in Kansas, the transmission delivery  
15 charge adjustments. Price is one of the major six components in the J.D. Power  
16 Customer Satisfaction Index and this attribute is significantly and negatively impacted  
17 by customer perceptions of multiple and ongoing adjustments to rates.
- 18       • **Implementing new Customer Information Systems (“CIS”):** During the past four  
19 years, both legacy KCP&L and Westar completed CIS projects which drove change for  
20 both customers and employees alike. As anticipated, contact center service levels were  
21 impacted during the early phases of these projects, when customer contact volumes  
22 were high, and teams were acclimating to new technology and consolidated business  
23 processes. However, as noted in previous testimony, these technology improvements

1 led to enhanced customer interactions and new self-serve functionality which will  
2 continue to improve our overall customer experience.

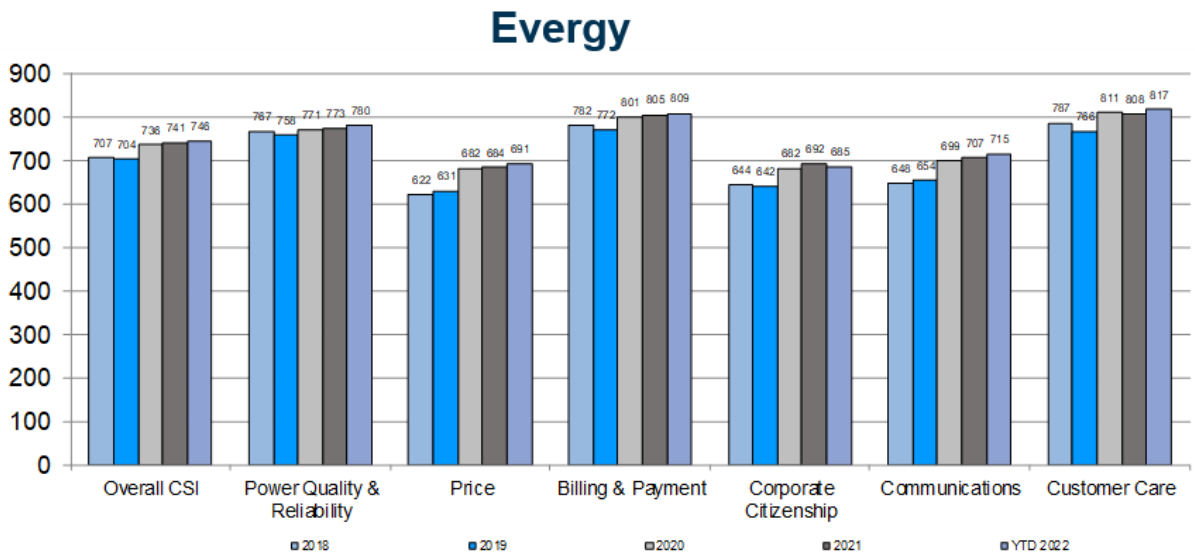
- 3 • **Advertising:** Outside of awareness advertising around rebranding to Evergy, the  
4 company spends very little on brand advertising. Evergy spends much less than almost  
5 every peer in this area and continues to underspend. One of J.D. Power's annual  
6 recommendations is to significantly increase brand advertising and communication if  
7 Evergy would like to see scores improve significantly. While brand advertising might  
8 improve scores, it does not in and of itself improve customer experience, so Evergy  
9 prioritizes other meaningful activities.

- 10 • **Energy Efficiency:** A component of J.D. Power is energy efficiency programs and  
11 energy efficiency program awareness. More than 60% of Evergy customers do not  
12 have access to those types of programs, since those programs are not available to our  
13 Kansas customers.

- 14 • **Evergy is a member of the SPP:** All of Evergy's peers in the Midwest Large section  
15 of the J.D. Power Customer Satisfaction Index survey are members of MISO. As such,  
16 in 2021, when the SPP required member companies to reduce load and run temporary  
17 forced power interruptions, this had a significant impact reputationally and on customer  
18 service scores for reliability for Evergy. Customers did not know that we had enough  
19 generation capacity to meet our customer demand and were being required to shut off  
20 power to preserve reliability in the 15-state region of the SPP. None of our peer  
21 companies in the Midwest Large section had a similar occurrence as members of  
22 MISO.

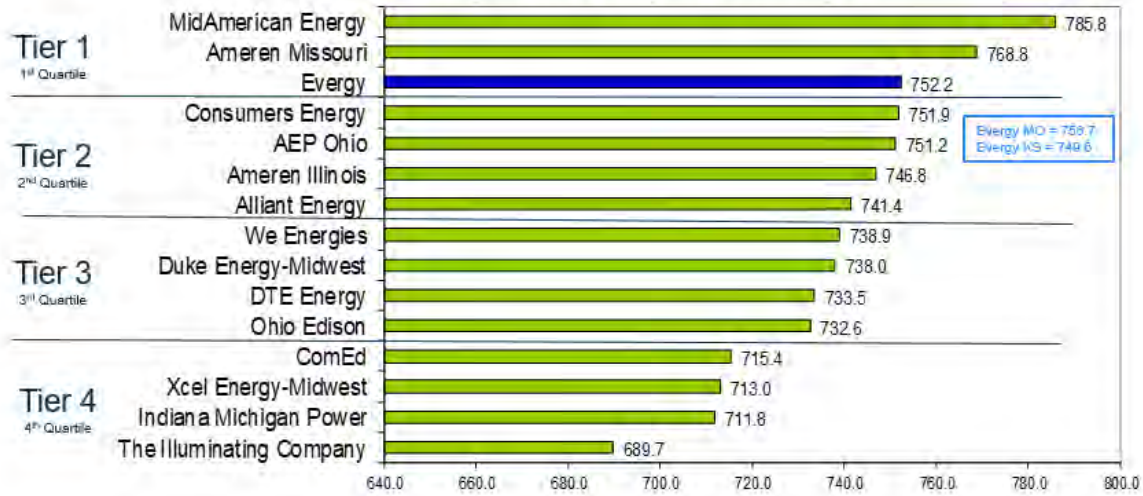
1           Despite having material justification for lower J.D. Power scores, Evergy is not  
 2           using them as an excuse for perpetually lower scores. Rather, as Dr. Marke references  
 3           from my rebuttal testimony, our goal is to steadily improve customer service and  
 4           experience and “to be top quartile among utilities nationwide and to see continual  
 5           improvement” to our customer service scores in J.D. Power and other metrics. And, that  
 6           is EXACTLY what we have done since the merger.

7           According to the most recent J.D. Power Electric Utility Residential Customer  
 8           Satisfaction Study, released for the second quarter of 2022, Evergy has been steadily  
 9           improving its customer satisfaction scores in every component of their Customer  
 10          Satisfaction Index (CSI).



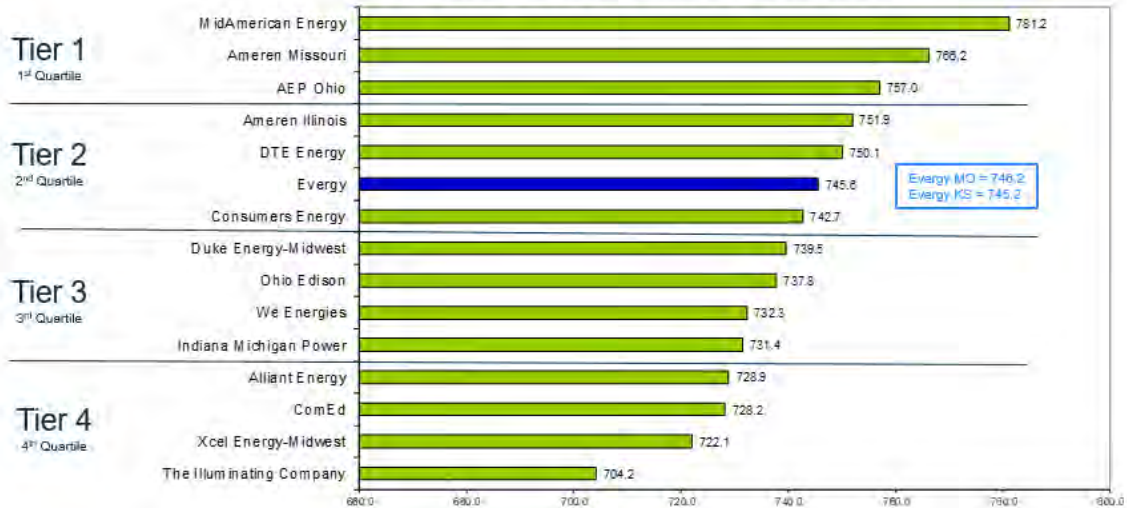
11  
 12           In addition, in the most recent survey, Evergy scored in the top quartile for the  
 13           Midwest Large section for the first time since the merger. Year to date, that puts Evergy  
 14           in the second quartile.

### 2Q22 – Overall Customer Satisfaction



1

### YTD 2022 – Overall Customer Satisfaction



2

3

4

5

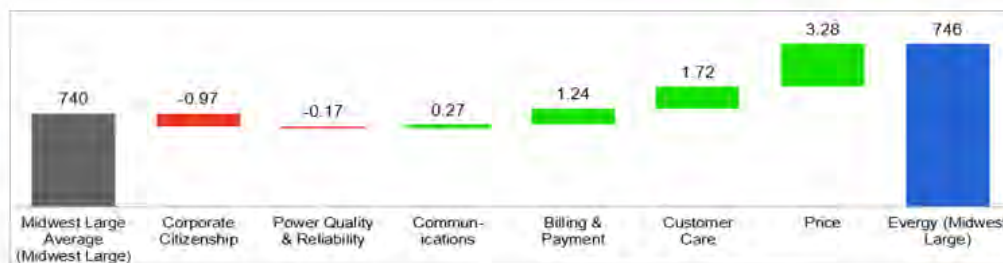
6

7

Further, Evergy is scoring above the Midwest Large average in key components relative to customer service and the customer experience enhancements that we have added as a part of the rate case and continue to work on implementing now and in the future. Note that Customer Care, Billing and Payment and Customer Communications are all above the average in Evergy's section.



YTD 2022



1  
2 In every area of customer service, Evergy scores above the Midwest Large average  
3 and in many cases in the first quartile in J.D. Power's second quartile of the 2022 survey.  
4 For in-person customer care, Evergy is 31 points year-to-date above the Midwest average  
5 and in the second quartile. For customer service by phone (which includes the much-  
6 maligned by Dr. Marke IVA), Evergy scores 33 points year-to-date above the Midwest  
7 average and in the first quartile. And, for digital customer care, Evergy scores 20 points  
8 above the Midwest average and is in the first quartile. Further, the Cogent Trusted Brand  
9 & Customer Engagement study for the second quarter of 2022 places Evergy six points  
10 above the Electric Midwest average in Customer and Field Service, scoring materially  
11 above peers in customer service through: social media, mobile app, email, text, website  
12 (both desktop and mobile) and text messaging. These are all part of the enhancements,  
13 enabled through CIS and AMI implementations, and part of our customer roadmap that are  
14 adding value for customers and improving customer service.

15 **Q: Dr. Marke recommends Evergy file its five-year road map of executable increments**  
16 **until the Company's next rate case. How do you feel about this recommendation?**

17 **A:** Building a customer experience road map is an ever-evolving activity. Keeping up with  
18 customer expectations as well as implementing new technology for both customer and  
19 employee benefit is a high priority of our digital and customer delivery teams as well as

1 other customer operations areas. I do not believe that filing our five-year plan is necessary  
2 as we are in continuous conversations with Staff and OPC related to new technology, etc.  
3 In addition, it is frequently updated as we balance resources whether it is time or money to  
4 execute new projects. These projects could mean new customer facing technologies such  
5 as a mobile app or new functionality on our web sites, or it could be changes within our  
6 billing or phone systems that make back-office processes more efficient. All these projects  
7 benefit the customer through improved customer interactions or cost savings.

8 Finally, Dr. Marke's recommendation that we should file a five-year plan customer  
9 service roadmap, like many of his recommendations, exceeds regulatory oversight and gets  
10 into management of the company. Despite that, we do have a roadmap. It is  
11 comprehensive. It looks at required resources and budgets. And, it is continually refined  
12 to better meet the changing customer service needs of our customers. The current version  
13 of that roadmap is attached to my Direct Testimony as **Confidential Schedule CAC-6**. It  
14 is a draft and subject to continual evolution.

15 **Q: In Ms. Kremer's testimony, she recommends that Evergy file its "Universal Service"**  
16 **plan with the MPSC. What is your response to this recommendation?**

17 A: My response to Universal Customer Service plans was covered in detail in my Rebuttal  
18 testimony. However, as it relates to the need to file such a plan, I don't believe it is  
19 necessary to file operational plans for Evergy to execute daily business.

1                                    **IV. TOU RATES AND CUSTOMER RATE CHOICE**

2    **Q: How do you respond to Dr. Marke’s statement that Evergy’s rate choice options**  
3                    **proposed in this case “are meant to distract the Commission from ordering**  
4                    **mandatory TOU rates”<sup>3</sup>?**

5    **A:** It is not surprising to me that Dr. Marke continues to beat this drum. The Company has  
6                    done an extreme amount of work on TOU rates, as evidenced by the various studies that  
7                    the Company has undertaken and in fact referenced by Dr. Marke.

8                    The Company described its Rate Modernization plan in great detail in this case  
9                    through my, Ms. Winslow, Mr. Lutz, and Mr. Ives testimonies. In addition, the Company  
10                  presented its Rate Modernization plan to the Commissioners on September 28, 2021, in an  
11                  on the record presentation<sup>4</sup> that also included our research on TOU, which we believe is a  
12                  key element in our overall rate choice plan. Our Rate Modernization plan is not meant to  
13                  “distract” the Commission or offered as a “red herring”<sup>5</sup> to negate the benefits of AMI  
14                  meters. Evergy has offered a robust portfolio of rates in this case that are optional for  
15                  customers to consider based on customer preferences and changing customer needs. We  
16                  have provided customer research to support this portfolio and have provided testimony that  
17                  our customers have received benefits of the AMI investment above solely offering  
18                  mandatory or default TOU rates.

---

<sup>3</sup> Marke Rebuttal, Page 7 , Line 21

<sup>4</sup> “Time of Use Rate Design Plan On The Record MPSC Presentation”, September 28, 2021

<sup>5</sup> Marke Rebuttal, Page 8, Lines 10-13

1 **Q: OPC witness Marke supports Staff’s “training wheels approach” and**  
2 **recommendation for TOU rates agreed upon by Ameren Missouri and Empire**  
3 **District Electric.<sup>6</sup> Please address the status of Ameren’s default TOU rates.**

4 A: I refer to Ameren witness Steven M. Wills testimony in File No. ER-2022-0337. From  
5 my understanding, Ameren began to implement default TOU rates following its 2019 rate  
6 case<sup>7</sup>. Residential customers are defaulted to a low peak/off peak differential TOU rate, or  
7 the Evening/Morning Savers rate (~1.04 differential<sup>8</sup>), within 6 months following the  
8 installation of an AMI meter. The default rate has “low load shift savings potential”<sup>9</sup>.  
9 Additionally, a customer does have the option of returning to a non-TOU rate, if they so  
10 elect.

11 Based on my review of Mr. Wills’ Table 2<sup>10</sup> that summarizes its four TOU rates  
12 and one non-TOU rate for those customers who have an AMI meter installed, I conclude  
13 that:

- 14 • Approximately 13% of Ameren customers who were defaulted to the Evening/Morning  
15 Savers rate after having received an AMI meter elected to return to a non-TOU rate.
- 16 • Approximately 87% of Ameren customers are on the TOU rate with the lowest  
17 potential to shift peak load (Evening/Morning Savers rate).
- 18 • Less than 0.3% of customers elected for a moderate or high TOU off peak/peak  
19 differential.

---

<sup>6</sup> Marke Rebuttal, Page 13, Lines 6-8

<sup>7</sup> Steven Wills Direct testimony, File No. ER-2022-0337

<sup>8</sup> Ibid.

<sup>9</sup> Ibid.

<sup>10</sup> Ibid.

1 As stated by Ms. Winslow in her Rebuttal testimony<sup>11</sup>, Evergy has consistently  
2 emphasized the purpose of TOU rates and industry perspective and learnings on the  
3 shortcomings of implementing a low differential rate.

4 **Q: Do you have any further concerns with Staff’s proposed default TOU rates after your**  
5 **review of Mr. Wills’ testimony?**

6 A: Yes, I’d like to reinforce Ms. Winslow’s rebuttal testimony in that the Commission should  
7 consider the risk of selling customers on the benefits of TOU rates when Staff’s slightly  
8 greater than 1X differential TOU design provides virtually no opportunity for bill savings.  
9 Mr. Wills further emphasizes my concern in his footnote on Page 8 of his direct testimony:  
10 “The Anytime User rate plan and the Evening/Morning Saver rate plan produce very  
11 similar bills for customers, so savings associated with these more advanced TOU rate plans  
12 relative to the new AMI default rate would be very similar to the levels reported relative to  
13 the legacy rate.” In addition, the very purpose of TOU rates is customer peak demand shift  
14 – Ameren identifies that the peak load shift for its Evening/Morning Savers rate is  
15 estimated to be less than 0.3%. Considering participation from the Evening/Morning  
16 Savers rate and those customers who elected to return to a non-TOU rate, Ameren’s AMI  
17 enabled customers barely contribute to any peak demand reduction from default TOU  
18 rates.<sup>12</sup> While Staff and OPC can criticize Evergy’s TOU opt-in plan, approximately 1%  
19 of our customers have verified peak demand shift of 14% in Missouri Metro and 4% in  
20 Missouri West.<sup>13</sup>

---

<sup>11</sup> Winslow Rebuttal, Pages 2-11

<sup>12</sup> Steven Wills Direct testimony, File No. ER-2022-0337

<sup>13</sup> Winslow Direct, Page 9, Lines 21-25

1 **Q: Has Evergy performed any additional research on rate choice since its 2021**  
2 **qualitative and quantitative research?**

3 A: Yes. In June 2022, the Company conducted an additional quantitative survey with nearly  
4 1,000 responses from its Missouri residential customers. The purpose of the research was  
5 to further explore and confirm findings from the qualitative customer research done in late  
6 2021 regarding electric rate plans and offerings from Evergy. I have attached a summary  
7 of that research as **Confidential Schedule CAC-5**.

8 **Q: What are some of the key findings of the research?**

9 A: The insights are highly relevant to the discussion at hand in this case and confirm at scale  
10 the prior results on the same topics. The bottom-line key insight is that (1) customers  
11 appreciate choice in rate plans, (2) there are at least two rate plans that customers gravitate  
12 more towards, and (3) customers responded adversely to mandatory electric rates. Some  
13 points highlighting these insights are as follows:

- 14 • More (90%) think Evergy should offer more rate plans than not (9%), but nearly  
15 half (46%) don't know.
- 16 • The top two plans respondents thought Evergy should offer were Flat Pricing  
17 (57%) and TOU-3 Period (45%).
- 18 • When asked which one rate plan they would be most likely to enroll in, Flat  
19 Pricing (40%) and TOU-3 Period (30%) were most selected.
- 20 • As described, most respondents do not support a Commission mandate for TOU  
21 (74%), do support more rate plans from Evergy (90%), and would prefer a  
22 choice of rates (95%) over mandated TOU (4%).

- 1           • A mandate for TOU from the MPSC would result in lower satisfaction for both  
2           Evergy (58%) and the Commission (69%).

3 **Q: The insight on the impact to Evergy customer satisfaction that would result if the**  
4 **Commission ordered mandatory rates is strongly unfavorable. Do you have any other**  
5 **supporting information from other mandatory TOU deployments?**

6 A: The mandatory approach to TOU rates has been tried in a few different jurisdictions across  
7 the country to a similar negative customer reception as found in the Missouri customer  
8 survey. One meta-study that points to the same issue has been provided in this case related  
9 to Ontario, Canada’s experience<sup>14</sup>. Ontario started with mandatory default TOU in 2011-  
10 12 and have since rolled back to provide rate options in 2020 based on many factors,  
11 including negative customer feedback. California is not always relatable to Missouri based  
12 on climate and policies, but we should learn from their failings of their approach to  
13 mandatory TOU rates and implications as well.

14 **Q: Did the survey get into more insights in regards Subscription Pricing (Flat Pricing)**  
15 **and Advance Easy Pay?**

16 A: Yes, those were two additional options explained to customers that had positive insights  
17 about the attributes and features of the potential options. Company witnesses Winslow and  
18 File will offer additional insights in their surrebuttal testimony on Subscription Pricing and  
19 Advance Easy Pay, respectively, from the June 2022 customer research.

---

<sup>14</sup> <https://www.oeb.ca/sites/default/files/report-RPP-Pilot-Meta-Analysis-20211110.pdf>

1 **Q: How do you respond to OPC witness Marke’s recommendation that the “Commission**  
2 **order Evergy to submit an open-source competitive RFP within thirty days following**  
3 **rates going into effect in which the Company will request a third-party consulting**  
4 **firm to develop and execute a marketing campaign to educate Evergy Missouri**  
5 **customers on the overall value proposition of TOU rates and to inform customers that**  
6 **larger differential rates will be going into effect for all customers following the**  
7 **conclusion of Evergy’s next rate case.<sup>15</sup>”**

8 A: This is an absurd recommendation. Evergy has educated its customers effectively on TOU  
9 – especially given the budget that it expended. Evergy has presented evidence with  
10 stakeholders and the Commission since the 2018 Rate Case and through this filing on the  
11 success of our marketing and education plans for TOU rates. OPC or Staff has not  
12 demonstrated in this case that Evergy did not follow any piece of the Rate Design S&A  
13 with respect to TOU.

#### 14 **V. CRITICAL NEEDS AND REHOUSING PILOT PROGRAMS**

15 **Q: Has the Company’s position on the Critical Needs or Rehousing Pilot Programs**  
16 **changed?**

17 A: No. I addressed these programs in my Rebuttal testimony<sup>16</sup>. Evergy does not recommend  
18 that the Commission approve these programs based on (1) Dr. Marke’s lack of research to  
19 support these proposed programs; (2) Dr. Marke fails to demonstrate how these programs  
20 differ from other programs that Evergy offers; and (3) Dr. Marke has not demonstrated that  
21 Evergy’s current programs and services do not meet the needs of the targeted customers  
22 for his two proposed programs.

---

<sup>15</sup> Marke Rebuttal, Page 15, Lines 17-25

<sup>16</sup>Caisley Rebuttal, Pages 30-38



1 **VI. AMI METERS**

2 **Q: OPC witness Marke and Staff witness Eubanks make various assertions concerning**  
3 **AMI meters in their rebuttal testimony. How do you respond?**

4 A: As their assertions are very similar to the same assertions made in direct testimony, I  
5 believe my Rebuttal testimony responds to their rebuttal testimony. However, I will also  
6 add that Dr. Marke repeatedly and gratuitously asserts, again with no evidence to support  
7 his claims, that customers have received no benefit from Evergy's CIS and AMI  
8 investments. He further asserts the only remedy for this is to impose mandatory TOU rates  
9 on all residential customers. Our testimony and evidence clearly shows that customers are  
10 opposed to a mandatory TOU rate. Our testimony and evidence clearly show that across a  
11 wide variety of customer service metrics the different projects and enhancements we have  
12 put in place as a direct result of our investments in AMI and CIS or enabled by those  
13 investments have produced steady improvement in customer service. But, just to make sure  
14 that it is clear where value has been created, the following areas are all direct results of or  
15 enabled by Evergy's AMI and CIS investments: remote and automated reconnections;  
16 enhanced customer portals for residential and business customers; enhanced energy usage  
17 and analysis, enhanced natural language IVA with steadily increasing functionality; a new  
18 mobile app; enhanced call center knowledge management and tools to serve customers;  
19 proposed rate modernization and choice; enhanced alerts and notifications; and, significant  
20 sustainable cost reductions to help reduce customer rates.

1 **VII. ALLEGED CONFLICT OF INTEREST**

2 **Q: Witness Kremer alleges that you have an inherent conflict of interest as a result of**  
3 **being the executive responsible for both regulated and non-regulated products and**  
4 **programs at Evergy. What is your response to that allegation?**

5 A: I categorically deny there is any conflict. In fact, I believe this dual role actually helps me  
6 better serve regulated customers. First, I have had responsibility for non-regulated products  
7 and services as well as customer experience for nearly ten years. It has never been raised  
8 by any party as an issue before in any proceeding before the Commission during that time  
9 period. In addition, Ms. Kremer does not offer one scintilla of evidence that there is the  
10 perception of a conflict with Evergy's customers or key stakeholders or any evidence that  
11 customers have suffered any damage or negative ramifications from this dual role. Second,  
12 non-regulated products and services is a tiny part of my responsibilities and no part of the  
13 corporate scorecard or the division scorecard incentivizes me to place non-regulated  
14 activities before regulated ones. In fact, it is just the opposite, that nearly all of my  
15 compensation at risk is directly tied to and impacted by regulated responsibilities and  
16 customer service. Third, the primary reason for my having this dual role is to protect our  
17 brand equity and regulated customer service. We have a clear rule at Evergy with respect  
18 to non-regulated activities: it is not enough for an activity to be profitable, it must be  
19 compliant with affiliate transaction rules, allocate cost pursuant to our cost allocation  
20 manual and ensure that customer service and experience is improved and not hurt. By  
21 having a dual responsibilities, I am in the best position to ensure those requirements are  
22 followed. Fourth, having a role in non-regulated products, services and divisions of Evergy,  
23 I have early access to new trends, technology and companies that could positively add to

1 regulated customer service. Finally, if having dual role or responsibility for regulated and  
2 non-regulated business activities at a utility is a conflict of interest, then most senior utility  
3 executives in the United States would have the same conflict.

4 **Q: Does that conclude your testimony?**

5 A: Yes, it does.

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

In the Matter of Evergy Metro, Inc. d/b/a Evergy )  
Missouri Metro's Request for Authority to ) Case No. ER-2022-0129  
Implement A General Rate Increase for Electric )  
Service )

In the Matter of Evergy Missouri West, Inc. d/b/a )  
Evergy Missouri West's Request for Authority to ) Case No. ER-2022-0130  
Implement A General Rate Increase for Electric )  
Service )

**AFFIDAVIT OF CHARLES A. CAISLEY**

**STATE OF MISSOURI** )  
 ) ss  
**COUNTY OF JACKSON** )

Charles A. Caisley, being first duly sworn on his oath, states:

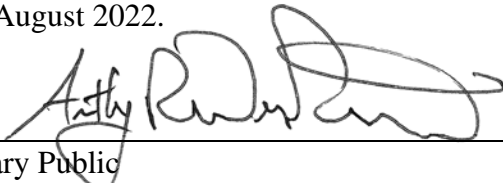
1. My name is Charles A. Caisley. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Senior Vice President – Public Affairs and Chief Customer Officer.

2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of Evergy Missouri Metro and Evergy Missouri West consisting of twenty-five (25) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Charles A. Caisley

Subscribed and sworn before me this 16<sup>th</sup> day of August 2022.

  
\_\_\_\_\_  
Notary Public

My commission expires: 4/26/2025



**SCHEDULES CAC-5 & CAC-6  
CONTAIN CONFIDENTIAL  
INFORMATION  
NOT AVAILBLE TO THE PUBLIC.  
ORIGINALS FILED UNDER SEAL.**