

In the Matter of:

THE RATE DESIGN CASE OF EVERGY METRO, INC., d/b/a EVERGY MISSOURI, etc.

EO-2021-0349 AND EO-2021-0350, VOL. II

September 28, 2021



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BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

TRANSCRIPT OF PROCEEDINGS

On-the-Record Presentation

September 28, 2021

Jefferson City, Missouri

Volume 2

WebEx

In the Matter of the Rate Design) File No.
Case of Evergy Metro, Inc. d/b/a) EO-2021-0349
Evergy Missouri Metro)

In the Matter of the Rate Design) File No.
Case of Evergy Missouri West, Inc.) EO-2021-0350
d/b/a Evergy Missouri West)

RON PRIDGIN, Presiding
REGULATORY LAW JUDGE

RYAN A. SILVEY, Chairman
SCOTT T. RUPP
MAIDA J. COLEMAN
JASON R. HOLSMAN
GLEN KOLKMEYER,
COMMISSIONERS

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A P P E A R A N C E S

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P R O C E E D I N G S

1
2 JUDGE PRIDGIN: We are on the record. Good
3 afternoon. This is the on-the-record presentation for
4 File Nos. EO-2021-0349 and 0350. This is the Time of
5 Use Rate Design -- or these are the Time of Use Rate
6 Design Reports for the Evergy Companies. And I would
7 like to get entries of appearance from counsel, please,
8 because with the Evergy Companies.

9 MR. FISCHER: Judge, on behalf of the Evergy
10 Companies, let the record reflect the appearance of
11 James Fischer. I'm with the law firm of Fischer &
12 Dority, and our address is 101 Madison Street, Suite
13 400, Jefferson City, Missouri 65101. I'm not sure that
14 Roger Steiner is on at the moment.

15 JUDGE PRIDGIN: Thank you. I don't see
16 Mr. Steiner, but thank you for your entry. Any entry of
17 appearance on behalf of the Staff of the Commission?

18 MR. STOKES: Yes, Judge Pridgin. My name is
19 Curt Stokes, C-u-r-t S-t-o-k-e-s, on behalf of the
20 Staff, address is 200 Madison Street, Jefferson City,
21 Missouri 65101.

22 JUDGE PRIDGIN: Thank you. Any entry on
23 behalf of the Office of the Public Counsel?

24 MR. WILLIAMS: Nathan Williams, PO Box 2230,
25 Jefferson City, Missouri 65102.

1 JUDGE PRIDGIN: Mr. Williams, thank you.
2 Because we are on WebEx, to the extent that you can, I
3 would ask everyone have your microphone on mute unless
4 you plan to speak. That will hopefully reduce the
5 feedback for the court reporter. And she may need to
6 jump in once in awhile to ask who is speaking, because
7 she can't see like she normally would in a hearing room.

8 I expect everyone is familiar with having to
9 deal with issues like these on WebEx, but I just wanted
10 to remind you. My plan is to hear from the companies
11 first and then the Company would need to be ready to
12 address Commission questions, and then we'll do
13 similarly for Staff and Public Counsel.

14 Is there anything from the parties or from the
15 bench before we hear presentation from Evergy?

16 MR. WILLIAMS: Judge, this is Nathan Williams.

17 JUDGE PRIDGIN: Yes, sir, go ahead.

18 MR. WILLIAMS: Dr. Geoff Marke will be
19 speaking on behalf of Public Counsel when you get to
20 that point in the presentation.

21 JUDGE PRIDGIN: Okay. Very good. Thank you.
22 Anything further? All right. If there's nothing
23 further, Mr. Fischer, whenever you are ready, sir.

24 MR. FISCHER: Judge, first of all, I'd just
25 like to thank the Commission for convening this

1 opportunity to make a presentation to the Commissioners
2 and the RLJ and the parties. Today we've got Brad Lutz
3 who has prepared a power point on the Time of Use
4 Report, and I'd like to just turn it over to him at this
5 point if that would be all right. Brad, are you on?

6 JUDGE PRIDGIN: That's just fine. Thank you.

7 MR. LUTZ: I am. I am. If I may, may I share
8 my screen?

9 JUDGE PRIDGIN: Certainly.

10 MR. LUTZ: Hopefully this is coming through.

11 JUDGE PRIDGIN: I can see it just fine.
12 Whenever you're ready, sir.

13 MR. LUTZ: Okay. Perfect. Thank you again.
14 As I'll echo Mr. Fischer's comment, we thank you for the
15 opportunity to come before you today and offer this
16 presentation concerning the Evergy Time of Use Rate
17 Design Case Report.

18 Representing Evergy today will be myself. My
19 name is Brad Lutz. I'm the Director of Regulatory
20 Affairs, and I also have Kim Winslow, Senior Director of
21 Energy Solutions, with me today.

22 The information we'll share has been taken
23 from the Company Report in this case and details our
24 efforts to deploy the Time of Use rates in our Missouri
25 jurisdictions. The report also details our plans to

1 expand adoption of Time of Use Rate Designs and to
2 modernize our rate options for customers. As is our
3 practice, we begin meetings with a short safety moment.
4 Our topic for today is emergency preparedness.

5 If you turn to slide 2, or I'll advance the
6 slides, September is National Preparedness Month and
7 Ready.gov sets out a four-step plan that folks should
8 use to address being prepared for emergencies.

9 We would encourage you to take the opportunity
10 to look at that plan and consider doing something
11 similar for you and your families.

12 Within the Evergy Rate Design Report, we've
13 attempted to lay out a proposal, a plan forward that we
14 will adopt.

15 (Off the record.)

16 MR. LUTZ: Thank you. We've attempted to set
17 out a proposal that will give shape to a rate design
18 that will ultimately be offered in our next general rate
19 proceeding. And in a nutshell, the rate design that
20 we're looking at will build on the success that we
21 believe that the Evergy opt-in TOU rate has had over the
22 last couple of years as we've worked through that
23 deployment.

24 We do acknowledge that there's always room to
25 learn and grow, and with that we've sought to modify the

1 existing TOU designs that we have but also to add to
2 those to find options that can appeal to a larger range
3 of customers and continue to appeal this rate design
4 alternative to our customers.

5 Now, also we acknowledge that this rate alone
6 is not the way to address what customers need. As has
7 been our process or has been a key factor of many of the
8 things that we've been attempting to deploy and execute
9 as Evergy, having the customer at the center of those
10 initiatives is important. And we recognize that we need
11 to have a broad portfolio of rates to address customer
12 needs and are setting forth a Rate Modernization Plan
13 that can help us lay out those alternatives.

14 TOU is certainly recognized as a cornerstone
15 of that, but we do see that there's a range of
16 alternatives that customers will need to see in order to
17 better engage with their rate designs and their energy
18 usage.

19 Now, briefly, I just want to reinforce that
20 the work that we're doing here is part of a broader
21 effort. As Evergy continues to set forth and respond
22 and build off of successes from its merger, we are also
23 endeavoring to do the Sustainability Transformation
24 Plan. And within that there are many customer aspects
25 and elements that we think harmonize well with the Rate

1 Modernization Plan and what we've set out here. Again,
2 TOU being a key element of all of that.

3 Now, this slide I won't devote much time to,
4 but it was an effort to capture some of the formal
5 pieces that led us to where we are today with respect to
6 this case.

7 Now we'd like to take just a moment and talk
8 about our current TOU rates. Kim Winslow, if you would,
9 please take a look at that or lead us on that, please.

10 MS. WINSLOW: Yes. Thank you, Brad. Thank
11 you, Commissioners and Judge for having us here today.
12 As Brad mentioned, I lead our Energy Solutions Team,
13 which is very critical in delivering our products to our
14 customers.

15 One of the things that you'll continue to hear
16 Brad and I talk about today is just the element of
17 educating customers in the importance of helping them
18 along the path and meeting them where they are. We're
19 very pleased to offer the current 3-Period TOU rate
20 which began in October of 2019, and we have successfully
21 achieved our target. Within our stipulation and
22 agreement, our target was 3,500 customers. We currently
23 have 5,629 customers enrolled on our 3-Period TOU rate.

24 As you can see, our current TOU rate, we have
25 a six times differential between the peak -- I'm sorry,

1 from the peak to the super off peak rate which has shown
2 to be very effective within our marketing and within the
3 behavioral changes for our customers.

4 We have completed one EMV. This was a
5 preliminary EMV, and from that EMV we found that there
6 are customer benefits as well as high acceptance by our
7 customers. So far we have seen roughly about a 3 to 10
8 percent annual bill savings, as well as reduction of
9 their peak demand which is around 4 to 9 percent.

10 We've also seen that customers have been
11 highly acceptive -- of the ones who are participating,
12 highly acceptive of this rate and also they're driven by
13 the savings and they appreciate the choice that we are
14 able to offer to the customer.

15 Next one, next slide. Great. Thank you. I
16 know that we have been before you a couple different
17 times speaking with the Commission on the success of our
18 program. So I don't want to spend too much time here.
19 Just as a reminder, we have done, you know, whenever we
20 first rolled out our program, our TOU program, we did
21 have extensive customer research in education and
22 outreach plan associated with that.

23 So when we first kicked off our TOU program,
24 we did six qualitative in-person focus groups so that we
25 could understand more about the tools upon which the

1 customers would want to rely upon. We also believe it's
2 very important to understand what are the expectations
3 and awareness of our program, and that is done through
4 some of our enrollment as well as our unenrollment
5 surveys.

6 Customers also, they also get behavior surveys
7 which is also used to measure that customer satisfaction
8 and the effectiveness of our tools. When we think about
9 the effectiveness of our tools, we turn to what we call
10 our Rate Education Report and our online Rate Analysis
11 Tool. What's very important that we see on all of the
12 surveys, as well as the education tools that we have, is
13 that we do have highly engaged customers involved in the
14 TOU rate.

15 We have found that there's about a 42 percent
16 unique open rate on both the Rate Education Report, and
17 then we have about 60 percent, over 60 percent
18 interaction with the Rate Analysis Tool which is on our
19 website. We're seeing very good engagement from our
20 customers.

21 We are also seeing that after customers
22 participate in this program they are also opening up
23 what we call the Rate Coach Report which is received on
24 a weekly basis. There's a 57 percent unique open rate
25 on those reports, and we still continue to see a large

1 amount of viewing, over 63,000 views from our customers
2 viewing their hourly usage and costs on the web.

3 Go to the next slide, Brad. When we first
4 began thinking about our education plan, we wanted to
5 make sure that we had established the right objectives.
6 So we had also reviewed this with stakeholders
7 throughout the process. So we wanted to make sure that
8 we were informing customers on the TOU rate option and
9 how usage during the day affected their bill, how it
10 affected their pricing.

11 We also wanted to continue to educate
12 customers on the TOU option and how that rate plan works
13 and enrolling customers in the TOU through targeted and
14 data driven marketing. So we have continued to assist
15 customers by enrolling them and creating the tools for
16 this ongoing communication campaign.

17 And if you recall, we do have a simple tag
18 line Wait 'til 8 to get a lower rate, because our peak
19 period is between 4:00 p.m. to 8:00 p.m. And on the
20 next slide with respect to our Marketing Plan, as I
21 mentioned, we have the tag line and this helps customers
22 again kind of put it in their mind when they should be
23 using energy and when they shouldn't.

24 We also have a very effective multi-channel
25 approach where we're reaching out to customers and

1 providing that large-scale awareness which also drives
2 enrollment. So we are reaching our customers through
3 website, through video, digital, social, radio and
4 email.

5 When we first also began our marketing plan,
6 we connected with the innovators, those customers who
7 really try to -- they want to try the new things first.
8 Those are our innovators and early adopters. We first
9 built greater awareness with those groups before we
10 reached out to our large customer base which we are
11 working with currently and have been for some time.

12 As I mentioned, we did complete an EMV that
13 was done last year and we will have a final report that
14 we will provide to the stakeholders and the
15 Commissioners which will be performed by the end of this
16 year. So that gives us yet another summer peak season
17 to see how customers are interacting with the Time of
18 Use rate.

19 As I mentioned earlier, we have seen great
20 results from the EMV from the analysis that they have
21 done, and we have seen that the consumption has reduced
22 both in the summer and non-summer season which drives
23 those participant bill savings. We have seen customers
24 lower their demand 4 to 9 percent of the system
25 coincident peak, as well as that they're saving money

1 annually.

2 So overall, I mean, we do feel like we have
3 had great success with our TOU program to this point.
4 Brad, I will turn it over for you to talk more about our
5 Rate Plan.

6 MR. LUTZ: Thank you, Kim. Now, turning
7 forward we want to build off of that success. No
8 question we're proud of what we've been able to
9 accomplish with the TOU rate to this point and recognize
10 the hard work that it's taken to develop those plans and
11 execute that customer interaction and marketing to
12 achieve what we have.

13 But to go forward, we felt that we needed to
14 keep a close eye to the industry. We need to make sure
15 that we know what is going on both across the nation but
16 also locally and try to look to those sources for best
17 practices or lessons learned.

18 We also need to look at our own data and see
19 how customers are responding and make sure that we're
20 seeing and understanding what's occurring. Lastly to
21 that we want to make sure that whatever we're proposing
22 is part of a larger comprehensive effort, and that leads
23 me to the Rate Modernization Plan that I've mentioned a
24 couple of times.

25 Before we get there, let's look at the

1 industry a little bit. For us, we retained some help
2 from some industry consultants who are leaders in this
3 area but also complemented that with our own research to
4 understand that TOU is kind of a bit of a puzzle. Not
5 that it's difficult to understand or execute or some of
6 those things but just that there's a lot of local
7 variation to it. But we did find some things that we
8 felt were kind of key learnings, key takeaways from what
9 we were seeing in the industry.

10 Just a couple of those is that the TOUs are
11 still really getting on their feet. Despite the rate
12 design being, you know, something that's been around for
13 quite awhile, it hasn't been until recently that the TOU
14 rate designs have really been able to reach their
15 potential and companies are starting to utilize them in
16 quite a larger effort but are still really connecting
17 with customers and allowing people to understand and
18 help them understand how these rates can be used and
19 allow people to move away from rate designs that they've
20 been familiar with nearly all their lives.

21 The other thing that we attempted to do was to
22 affirm many of the things that we know are of issue.
23 You know, the opt-in/opt-out question was certainly
24 important in 2018, when we first put these rates into
25 practice. And at that time and since then we've tried

1 to keep a close eye on what are some of the general
2 practices around these deployment approaches. These are
3 some of the observations that we have found relative to
4 whether an opt-in or opt-out might be preferred or might
5 help the Company and stakeholders achieve certain goals.
6 But in general we would offer that opt-in approaches
7 tend to have higher participation -- excuse me -- higher
8 retention and performance on a per customer basis, but
9 there's no question that the opt-out will touch a larger
10 number of customers. So the offset for that or the
11 concern for us is some of the factors around customer
12 satisfaction, and we believe that there is a direct
13 relationship between the opt-out approach and some of
14 those customer satisfaction observations.

15 But still, you know, we're keeping an on eye
16 on that and making sure that that's understood as we
17 continue to roll forward in this TOU effort.

18 Another part, and we mentioned this a couple
19 of times, but the customer is no question a foundational
20 element to what we're preparing to do. As Kim
21 mentioned, we've utilized a number of touch points with
22 customers to better understand what they want, how they
23 want their rates to work and find ways to connect with
24 them.

25 On this particular slide, you'll see a series

1 of studies and initiatives that we've purposefully went
2 through across time to understand how our customers
3 behave and how they look at a TOU rate. Some of these
4 studies go back a number of years, and a number of them
5 have been progressively more detailed as we've continued
6 to seek deeper understanding.

7 We even have plans going forward on here to
8 continue to interact with customers through focus groups
9 and some other mechanisms to continue that
10 understanding. Another piece that we use to inform
11 ourselves was to monitor what's going on in the state.
12 It's wise to be aware of what's going on in Missouri and
13 make sure that the developments and things there that we
14 understand them and that if they are applicable to us
15 that we find ways to provide recognition to that but
16 certainly have to understand that not always is what's
17 good for one good for the other. And we're in the
18 process of evaluating that.

19 On this particular slide, we are aware of
20 what's been going on with Ameren and their deployment of
21 TOU and we've been monitoring the proposals made by
22 Empire in their recent case. We admit there's promise
23 I'm sure in both of those approaches and we want to try
24 to glean from that what we can. But we do have to
25 acknowledge that we're noticing differences just in the

1 positioning of Evergy relative to Empire and to Ameren.
2 Maybe it begins simply just in our status on AMI
3 deployment but it might also go further. Maybe into the
4 way we choose to interact with customers. Needless to
5 say, we're trying to be sensitive and aware of these
6 other developments, but certainly we're seeking to find
7 a path that makes sense for Evergy as we get ready to
8 file our own rate cases and explore this even further.

9 So boiling it down, with respect strictly to
10 Time of Use, our proposal has three parts. First of
11 all, we want to build on the success of the 3-part rate.
12 Without question, we believe that the initial design is
13 meaningful and that it achieves results. As Kim
14 mentioned, we are able to see those results.

15 So with our forward-looking proposal, we seek
16 to tweak that just a bit just to see if we can better
17 improve some of the performance or some of the adoption
18 levels, but largely the 3-part rate is successful and we
19 want to build on that.

20 The building we think is going to occur
21 through the proposal of a 2-part Time of Use rate. The
22 point here being is that we're finding that some
23 customers are just unwilling to commit to the high peak
24 differentials that we see in the 3-part design and are
25 believing that a 2-part design would soften some of that

1 and allow a larger number of customers to engage the TOU
2 rate design.

3 We also believe the TOU rate design might be
4 able to address some concerns with customers with
5 heating and maybe even for electric vehicles, a segment
6 that we've continued to try to reach out to.

7 The last is that we want to make sure that our
8 plan continues to leverage strong customer education;
9 that without question the success of these rates require
10 education of the customer not only to just make them
11 aware but also to make them -- educate them on how to
12 put the rate to use.

13 A TOU rate, unlike many of the rate designs we
14 have used in the past, it's an active rate design. You
15 have to be aware of and respond to the time signals,
16 time periods that are part of the rate design. For
17 years for decades we've had more passive rate designs
18 where you just simply use energy and at the end of the
19 month you receive a bill and it's very difficult to
20 understand or to control that. It's very, very binary.
21 Either you use energy or you don't, where TOU now
22 introduces the idea of shifting some energy use to
23 different periods to begin to effect your ultimate
24 energy rate.

25 So on this slide this details some of the

1 adjustments that we want to make to our 3-Part rate.
2 They're not many. You can see them highlighted in
3 orange down here and listed in the boxes along the top.
4 In general, we want to adjust the seasons a little bit
5 to better align them across our jurisdictions, but also
6 we want to effect a little bit of change to the
7 differentials between the peaks and the off-peak
8 pricing. We think this better follows the costs that we
9 observe and sets out a better expectation for the
10 customers.

11 On the TOU, on the 2-Part TOU, excuse me,
12 we're wanting to focus on the summer. This is no
13 question a period of time of highest cost relevance for
14 the Company, and we believe that by putting forth a TOU
15 design that addresses that period will allow us to gain
16 the primary benefit of the rate but not expose customers
17 to the full year round effect of the TOU and especially
18 those customers who might have heating or some other
19 off-peak usage of energy that is attractive to the
20 Company.

21 So you can see the details here. Many of the
22 periods and price differentials are very similar to the
23 3-Part rate, but there's just a bit of a difference in
24 the deployment focusing instead on the 2-Period design.

25 I mentioned the customer education. This

1 slide highlights the elements of that customer education
2 plan and it really boils down to those four words along
3 the left side. We want to continue to make the message
4 simple. We want to be able to connect with our
5 customers. We want them to see consistency across all
6 of our platforms, and we want them to understand what
7 they're signing up for and be a part of what Evergy is
8 trying to help them understand.

9 So as we shift to the Modernization Plan, we
10 would like to conclude our presentation with a couple
11 slides that just gives the Commission an indication of
12 the direction that we intend to go in our future rate
13 case. We've talked about the TOU element a bit, and
14 that certainly is at the core. But I wanted to
15 highlight quickly our commitment to the belief that a
16 portfolio approach is the way to go. I think we've seen
17 similar positions taken by other utilities both in the
18 state and in the area, but the idea is, and this graphic
19 kind of gives life to that a little bit, is that there
20 is a spectrum of rates that can be made available to a
21 customer. That spectrum of rates balances between the
22 risk and the change of price for their bill and the
23 savings that they might receive.

24 So let me give you an example. There could be
25 a rate design, let's just say TOU for example, that

1 tends to be more dynamic, it tends to move around more
2 but it does give the customer a pretty high chance to
3 save if they're willing to respond and change behaviors,
4 but on the other end of the spectrum there could be rate
5 designs that customers prefer that are less variable
6 that maybe even are fixed and in exchange are more
7 expensive but in the portfolio approach of the rate
8 design appeals to a segment of customers who honestly
9 aren't willing or maybe even able to change their energy
10 usage and adjust to those Time of Use periods like other
11 customers met.

12 The key point being is that this portfolio
13 approach allows you to set forth a series of rate
14 options that can meet the customers where they are and
15 help them pick solutions that provide a balance between
16 those two elements and engage them in their energy usage
17 and their energy behavior.

18 Now, I won't spend a lot of time on this
19 slide. I think there's a number of folks in this
20 meeting who have seen this before, but this is some of
21 the background around the context of our Rate
22 Modernization Plan. Many of the drivers, some borne out
23 of our sustainability and transformation plan, but
24 others coming out of more common industry points of view
25 have set out the foundation for what we're trying to

1 accomplish.

2 Now, on that this is kind of the elements that
3 we see coming with respect to our Rate Modernization
4 Plan. In addition to the Time of Use proposal that we
5 just discussed moments ago, Evergy plans to devote quite
6 a bit of effort to continuing to consolidate our rates
7 and continue to move to one set of rate designs for our
8 jurisdictions. I think you could probably anticipate
9 that our first goal is to try to come together at the
10 state level, and that's certainly our near term goal.

11 What you should expect to see is continued
12 movement to bring Missouri Metro and Missouri West in
13 alignment as far as rate structures, rate offerings. We
14 also plan to introduce Subscription + and Prepay, a
15 couple of rate options that can stand on the other side
16 of the spectrum from TOU and fulfill that portfolio
17 approach that we talked about a few slides ago.

18 We believe that there is a segment of our
19 customer population that wants these rates, and we've
20 doing our due diligence to understand how they work
21 within the industry and set forth some examples in our
22 filings that will provide an opportunity for customers
23 to use these rates.

24 The last is kind of a compliance nod here, but
25 I want to make sure that we've not lost sight of it. In

1 our Modernization Plans, we do want to address low
2 income solar. This has been an element that we've
3 embedded in a couple of stipulations and we're certainly
4 working to understand how to make this happen and will
5 have this as part of our proposal in that future rate
6 case as well.

7 So to conclude and just to reiterate our rate
8 design proposal. Around TOU we believe we've been
9 successful in putting forth a good rate design and we
10 have accompanied it with the education and marketing to
11 help really connect with customers and build an active
12 user set.

13 Within that, we do plan to tweak the existing
14 TOU rate design, the 3-Part rate design, and complement
15 it with a 2-Part rate design, and then finally we will
16 have TOU at the center of our Rate Modernization Plans
17 as we consider ways to deploy a portfolio of rates for
18 our customers in our Missouri jurisdiction.

19 With that, we're open to field any questions
20 that anyone might have about that material.

21 JUDGE PRIDGIN: Thank you. Let me see if we
22 have any questions or comments from the bench.

23 Mr. Chairman, any questions?

24 CHAIRMAN SILVEY: Thank you, Judge. Thank you
25 for the information update on the TOU rates. I do have

1 a question for Evergy. It's my understanding that Staff
2 feels that the Company has failed to file a cost of -- a
3 class cost of service study that's been required in
4 previous stipulations. So I'm wondering what is the
5 status of that study?

6 MR. LUTZ: Those agreements I think what
7 you'll find is that we've been in contact with Staff
8 throughout the time that has passed since those original
9 agreements end today. There are efforts underway to
10 address or have considered that those have been
11 addressed along the way. Some of that came out of the
12 consolidation studies that we filed earlier in the year.
13 But looking forward certainly we expect that all of our
14 rate cases will include those levels of data, those
15 consolidated studies that are referenced there.

16 So to the extent that something is left
17 unaddressed, it certainly will be as part of the
18 upcoming rate cases.

19 CHAIRMAN SILVEY: Okay. Thank you. Thank
20 you, Judge.

21 JUDGE PRIDGIN: Thank you. Any questions,
22 Commissioner Rupp?

23 COMMISSIONER RUPP: Yeah, thank you, Judge.
24 This is Commissioner Rupp for the court reporter. I
25 wanted to follow up, Mr. Lutz, on the Chairman's

1 question. So what I heard you say is that you are
2 guaranteeing that in your next rate case you're going to
3 address the things that you were supposed to address in
4 the 2016 and 2018 stipulations; that's what I thought I
5 heard. Can you confirm that I heard that correctly?

6 MR. LUTZ: Yes. And the caveat that I would
7 offer to that is that we have been participating in some
8 other filings and other exchanges with Staff and parties
9 along the way, and there could be some debate about some
10 of those elements, but we've been trying to accomplish
11 those along the way. And to the extent that there's any
12 that remain, we will attempt to cover those in the rate
13 case, yes.

14 COMMISSIONER RUPP: Okay. Because, yeah, we
15 can have debate on whether or not, but it's pretty darn
16 clear that what you guys were supposed to perform and I
17 understand you can debate that. But I believe at least
18 from my position and I believe with the question you got
19 from the Chairman is that the Commission standpoint is
20 it was pretty darn clear and there shouldn't be any gray
21 area about what you should do. So I'm encouraged that
22 you guys are actually going to finally get around to
23 doing that.

24 We've been allowing you to get this return on
25 these investments for, what, six years now. And so your

1 company is reaping the benefits of this and we haven't
2 yet seen the utilization of this technology to the
3 benefit for the ratepayers at that point, and not
4 complying with the things that we have put out and that
5 you've agreed to just causes concern when we go to look
6 at other things in the future. But I'm encouraged, I'm
7 very encouraged that in your next rate case that you're
8 going to be using the data set that was required in the
9 2016 agreement or Staff's alternative data set. Are
10 those the data sets you're going to use?

11 MR. LUTZ: Yes. To those points, I mean, the
12 data, if I may clarify, I mean, the point you're
13 mentioning echoes some of the sentiments offered by OPC
14 I would believe. And you know, although I can
15 understand the desire and the connection with the rate
16 design elements and the AMI system, I would like to
17 assure you, sir, that we've been reaping a number of
18 benefits on behalf of the customer through those years.
19 Looking back, I've done some research on my own to
20 understand the timing of those things, and if I
21 understand it correctly, we were at end of life on an
22 automated meter reading system and this AMI investment
23 allowed us to continue to benefit from automated
24 metering. And when you combine that with the work that
25 has been done on the billing systems, we've been able to

1 present to customers over that time period a number of
2 new data options and billing improvements that have
3 benefited those customers that I would contend, sir,
4 that there have been benefits along the way. And
5 certainly TOU represents another level to that and we
6 want to get there, but I would disagree that there has
7 not been any customer benefit along those years.

8 COMMISSIONER RUPP: I agree that there has
9 been benefits but you have not maximized or even come
10 close to maximizing the technology. To your point, yes,
11 you have been achieving benefits. I think some of it is
12 overshadowed by the fact that you failed to comply with
13 two stipulations in 2016, 2018, and at times those
14 glaring omissions tend to overshadow some of the
15 successes that you were having along the way.

16 I'm encouraged that in 2022 rate case that
17 we're kind of anticipating here that you're going to be
18 rectifying those situations. So that is great.

19 The only other questions I have is I know you
20 guys talked about on your previous slide a rate -- a
21 panel of rate options. I can't remember the word you
22 used and stuff. Your plan elements. Did you guys look
23 at modified seasonal rates in your proposal?

24 MR. LUTZ: To clarify, are you talking about
25 just a change of seasons with respect to the current

1 block rate designs?

2 COMMISSIONER RUPP: Yeah, I'm kind of trying
3 to identify there's other types of rate designs that
4 were mentioned in the 2016 stipulation and agreement
5 that you are to look at, and I did not see, you know,
6 modified seasonal rates. They weren't mentioned in your
7 report, responsible energy or for use of inclining block
8 rates that wasn't mentioned in the report, but I believe
9 that was in the 2016 agreement.

10 The electric vehicle TOU rates for standalone
11 chargers, didn't see that in the report. The realtime
12 pricing, didn't see that in the report. The peak time
13 rebates, I think that was mentioned once in the report.
14 Your critical peak rates and pricing, I think that was
15 mentioned once in the report. So did you look at those
16 things that were in the 2016 stipulation and did you
17 just not put them in the report because you didn't want
18 to move forward or did you contemplate that or did you
19 ignore it like you did the rest of the stuff in the 2016
20 stipulation?

21 MR. LUTZ: Oh, no, nothing has been ignored.
22 I mean, I think what I would offer is that there's been
23 just a lot of transition that has occurred since 2016.
24 I mean, without question, I mean, if you look at
25 everything, whether it be the mergers, whether it be the

1 billing system implementations, whether it be the
2 finalization of the AMI-MDM rollouts. There have been
3 just a furious pace of change that's occurred from 2016
4 to today, and the Company has done its best to try to
5 adjust and respond to those commitments in light of that
6 change. Unfortunately it doesn't always line up; that
7 in some cases it's just more practical to not do those
8 things at that time.

9 And we've been trying to be communicative to
10 Staff and other parties on our processes so that they
11 know where we're at. But more specific to your rates, I
12 think what you would find there is that those rates are
13 finding different paths. For example, the electric
14 vehicle rates are probably being pulled into the
15 electrification to some degree, the other filings that
16 we have before you.

17 Others are being pulled into discussions at
18 MEEIA level. So like peak time rebates or some of those
19 other designs are finding a better path through the
20 MEEIA channels. What I would offer is that those are
21 being distributed out where they make the most sense as
22 opposed to being kept somewhat arbitrarily in this
23 relationship with TOU. Some of those things aren't
24 really what I would say companions to TOU or options to
25 TOU.

1 Some of them are just other rate designs. And
2 so the logic of keeping them wed to TOU may not be
3 practical at this point. So that's what you're seeing.
4 It's not being ignored at all, but sometimes those
5 things are being parsed out to different approaches that
6 the Company is taking.

7 COMMISSIONER RUPP: Yeah, I can understand
8 that and I appreciate that response. I can see how some
9 of those probably may be being addressed in some of the
10 other aspects. It's hard to go back from 2016 to five
11 years and track that when it could be included in
12 previous things if they would have been addressed.

13 MR. LUTZ: That highlights a good point that
14 at minimum in our rate case filing we need to provide a
15 pathway, a transition, a way to connect the dots between
16 then and now so that questions like this can be
17 addressed as part of the direct filing. So that's good
18 advice. I appreciate that.

19 COMMISSIONER RUPP: That's actually a good
20 point you just mentioned, because I think in the IRP and
21 the special circumstances and stuff we do allow the
22 utilities to just say this is being addressed here and
23 to just reference it. It does help us follow those
24 things so that it does not give the impression that
25 you're failing to follow through on commitments if we

1 can't detract them with a cursory review. Yeah, that's
2 a good point you mentioned, Brad. I appreciate that.
3 That's all I had for now, Judge. Thank you for your
4 time.

5 MR. LUTZ: Thank you, sir.

6 JUDGE PRIDGIN: Judge, this is Commissioner
7 Holsman. I have a question.

8 JUDGE PRIDGIN: Commissioner Holsman, thank
9 you. Let me see if Commissioner Coleman, do you have
10 any questions, Commissioner Coleman?

11 COMMISSIONER COLEMAN: It's hard for me to
12 unmute. No, I don't have any. Thank you very much.

13 JUDGE PRIDGIN: Commissioner Coleman, thank
14 you. Commissioner Holsman, when you're ready, sir.

15 COMMISSIONER HOLSMAN: Thank you. Could you
16 elaborate on how the Company specifically plans to
17 overcome the challenges identified in the report to
18 specifically address the accessibility of Time of Use
19 Rates Design for net metered customers? We've had this
20 discussion in previous Time of Use rate discussions. I
21 want to see how Evergy plans to handle it.

22 MR. LUTZ: Right. We've had a lot of
23 discussion about this. I mean, to begin we think that
24 the constraint starts with statute; that the way the
25 current net metering statutes and by proxy the

1 regulations in our tariff, they just preclude us from
2 using Time of Use periods for the purpose of netting.
3 So honestly the best solution that we've been able to
4 come up with is one that we've come up with just very
5 recently. In fact, we're trying to come up with some
6 tariff language as we speak. But that is to come to the
7 Commission with a mirror tariff, in a sense a largely
8 duplicative tariff to the net metering tariff that's
9 already there but to include provisions that would allow
10 and handle the TOU netting processes. This would allow
11 us to not be constrained by the legislative process to
12 change that statute but would allow the Commission to
13 exercise its authority to approve a rate design or a
14 tariff and we could create a mirror of the current net
15 metering but one that has proper provisions to deal with
16 TOU periods instead of being constrained by the monthly
17 billing period that's embedded in statute.

18 COMMISSIONER HOLSMAN: Okay. And so what's
19 the likelihood that you think you're going to require a
20 statutory change to be able to provide TOU to net
21 metering customers? Are you confident that the work
22 around will be successful or do you still think you're
23 going to have to change the statute?

24 MR. LUTZ: Two parts there. I believe that
25 the tariff approach we've not consulted with all legal

1 internally to drive this completely to ground, but I
2 have all reason to believe that the Commission has the
3 authority to approve a tariff that's in addition to the
4 one that's there to comply with statute. So I think I
5 feel very good there that that will be well received.

6 Now, to your original question about the
7 statutory change, we have reached out to Ameren and have
8 discovered that they had some language that had been
9 proposed to address this. So we're working maybe at my
10 level at least at this point to start to coordinate what
11 it might look like for us to explore statutory change.

12 I think the language, sir, might have even
13 been shared with you and your advisors, I believe. So
14 that's the language that we're considering today.

15 COMMISSIONER HOLSMAN: Well, and the issue
16 from my vantage individually having been in the
17 legislature when a lot of this came to be, I'm always
18 worried about opening up chapters that would encourage
19 other changes that may not be as welcomed as this change
20 so if there is a way to do it. So would you ask for a
21 waiver or variance, something that would allow us to do
22 a mirror tariff?

23 MR. LUTZ: I'm going to rely on my legal
24 counsel to tell me that. I don't know if we think a
25 waiver is needed yet. Like I say, we're in our very

1 early stages of rounding out this proposal. But I would
2 believe as a nonlawyer that we've complied with statute
3 through the existing tariff and that this would be an
4 additional tariff to address a new subset of customers.
5 It would be in largely the same except it would have
6 specific provisions to handle the time periods
7 introduced by TOU instead of being reliant on a monthly
8 billing period.

9 COMMISSIONER HOLSMAN: Okay. Well, I guess
10 we'll cross that bridge when we get there. I have a
11 second question here that deals with electric vehicles.
12 The report shares that the electric vehicle owners made
13 a substantial movement to charging their vehicles
14 overnight after enrolling in the plan and the report
15 says from 24 to 84 percent. How does this compare to
16 what your expectations were, and can that level of load
17 shifting persist? Does the 84 percent represent the
18 upper limit of what you think is possible or is there
19 still more capacity for folks to make that choice?

20 MR. LUTZ: Kim Winslow, would you be able to
21 assist on that response?

22 MS. WINSLOW: Yes, I'll do my best. So that
23 EMV can show kind of that range there, we will continue
24 with our secondary EMV or our final EMV. We are
25 continuing to work or, you know, have that analysis done

1 yet that is still persisting. That wasn't a very small
2 number of EMV drivers. We did not see as much of an
3 uptake with EMV drivers onto the TOU rate as what we had
4 hoped. That was a result of that EMV analysis, and we
5 had been focused more on this year 2021 trying to
6 connect some of our messaging back with EMV drivers as
7 well as the thermostat customer low income and with
8 partnering with that TOU. So we have seen some increase
9 in EMV driver adoption with those TOU rates. It has
10 been with a more focused campaign. So we are going to
11 be really looking forward to seeing how that continues
12 to unfold especially with respect to the EMV that we'll
13 have complete at the end of this year.

14 COMMISSIONER HOLSMAN: Okay. Thank you.
15 Judge, that concludes my questions for the moment.
16 Thank you.

17 JUDGE PRIDGIN: Thank you. Let me see if we
18 have any further questions. Commissioner Kolkmeyer, any
19 questions?

20 COMMISSIONER KOLKMEYER: No, sir. No thank
21 you. Thank you, Judge.

22 JUDGE PRIDGIN: I think I may have just a few
23 questions and I'll just let this up to whomever from
24 Everyg would like to respond. This is on customer
25 education and shadow billing. I think on page 21 the

1 Company discussed shadow billing and how it formed the
2 foundation for its TOU engagement strategy, and I guess
3 I wonder if the Company could talk about what role
4 shadow billing would continue to have in customer
5 education and engagement strategies.

6 MS. WINSLOW: Do you want me to take that one,
7 Brad?

8 MR. LUTZ: Please.

9 THE COURT REPORTER: I'm sorry. Judge --

10 JUDGE PRIDGIN: Yes.

11 THE COURT REPORTER: -- I need Ms. Winslow to
12 start again and to speak up. She's not coming through
13 very loud.

14 JUDGE PRIDGIN: I would echo that. I can hear
15 you, Ms. Winslow, but I can't always make out the words
16 you're saying. I'm hoping you can get closer to a
17 microphone.

18 MS. WINSLOW: I'm sorry about that. Is this a
19 little bit better? No?

20 JUDGE PRIDGIN: I heard you say I'm sorry
21 about that pretty clearly and then I lost you after
22 that.

23 MS. WINSLOW: This is a little bit better?

24 JUDGE PRIDGIN: Yes.

25 MS. WINSLOW: Okay. I'm so sorry about that,

1 yeah. Yes, so with respect to the shadow billing
2 question, so we had, you know, significant discussion
3 with stakeholders early on when we first began, you
4 know, putting forth our education plan. We discussed
5 shadow billing and what role that would play. What we
6 did find was that rather than what is more impactful
7 than having, you know, within on the bill, on the paper
8 bill with the comparison of the customer's use under the
9 Time of Use rate versus the general service rate, we
10 have taken the route of those rate coach report and
11 those weekly reports that we are sending to customers.
12 So we have found that to be very effective. As I
13 mentioned, there was -- we have a very high open rate
14 with our customers who are on the TOU rate and engaging
15 with those reports. So kind of moving towards again
16 more the digital aspect, sending them emails with
17 respect to how they're performing on their rate and
18 giving that more I guess not realtime feedback. I mean,
19 they can certainly go out and look on the website to see
20 how they are doing but they are receiving these weekly
21 AMI reports to see how they are performing on the rate.
22 So that is -- When we talked with stakeholders, that is
23 our version of the shadow billing and that is found to
24 be very well adopted across the utility industry.

25 JUDGE PRIDGIN: Thank you. And regarding

1 Prepay and before the Company even filed this report, is
2 it true that customers can already make prepayments even
3 before you filed this report?

4 MR. LUTZ: Yes, I'll address that. As far as
5 prepay, I am not aware of any option that we have
6 currently for prepayment in our Missouri jurisdictions.
7 Kim, is that consistent with your understanding?

8 MS. WINSLOW: Yeah, that's correct, Brad, yes.

9 JUDGE PRIDGIN: Okay. Thank you. I think the
10 report also discusses subscription pricing options. Are
11 you able to identify other utilities across the country
12 that offer a similar program?

13 MR. LUTZ: Yes. Again, we're working with
14 Brattle, a consultant in this area, to round out that
15 research. Certainly, yes, one of the more prolific
16 examples that you might hear about recently is the Duke
17 Florida examples. Lon Huber has led an effort to deploy
18 a subscription rate design there, and that has been
19 communicated quite a bit through many of the industry
20 publications and is probably the most easily accessible
21 example to draw from.

22 JUDGE PRIDGIN: Do you know if any of the
23 other utilities that offer subscription pricing will
24 couple that program with demand response or energy
25 efficiency incentives?

1 MR. LUTZ: Yes, sir. The Subscription +
2 approach they call it is actually I think generally
3 preferred, because stand alone the subscription rate
4 might be considered to have some weaknesses but when
5 partnered with other offerings it can lead to more
6 general benefit for both participants and the
7 non-participants.

8 JUDGE PRIDGIN: All right. Thank you. I
9 think those are all my questions. Anything further from
10 the bench before we move on to Staff? All right.
11 Hearing nothing. Everyy, thank you very much. And
12 Mr. Stokes, or whoever is presenting from Staff,
13 whenever you're ready.

14 MR. STOKES: Thank you, Judge. Can you hear
15 me okay?

16 JUDGE PRIDGIN: I can. Thank you.

17 MR. STOKES: May it please the Commission.
18 I'm Curt Stokes on behalf of the Commission Staff. This
19 is primarily an informational case. It's not a rate
20 design case. Traditionally there are no tariffs to
21 promulgate and nobody is asking for new rates or
22 presenting evidence to support new rates.

23 In addition, under Section 393.1400 and
24 393.1675, Everyy had elected use of treatment and would
25 be prohibited from updating its rates until its next

1 rate case anyway, which we anticipate in early 2022.

2 THE COURT REPORTER: I'm sorry, Judge. Judge,
3 I was wondering if Mr. Stokes could maybe slow down and
4 maybe take his mask off. I'm having a hard time
5 catching him.

6 MR. STOKES: I'm going to get closer to the
7 phone. How is this? Is this better?

8 In summary, any decisions about Evergy's rates
9 should be reserved for its upcoming rate case and should
10 be based on the evidence presented in that case.

11 However, Staff does ask the Commission to exercise its
12 authority under Section 393.140(5) of the Revised
13 Statutes of Missouri to issue an order in this case
14 requiring Evergy to include a plan to roll out system
15 wide Time of Use rates in its direct filing in its next
16 rate case.

17 Staff asks the Commission to order Evergy to
18 address, first, customer notices and education; second,
19 applicable Time of Use determinants; third,
20 establishment of separate winter rates and shoulder
21 rates; and fourth, the meter and usage data that's
22 listed in a document that I'd like to share later.
23 Rather than read through all of the data that we want to
24 be provided in the next rate case, I just ask that we be
25 allowed to email the Judge and the parties and include

1 that.

2 Further, Staff asks the Commission to order
3 Evergy to provide no later than its direct filing in its
4 next rate case as much AMI billing data to Staff and to
5 OPC as can reasonably be provided, and even to the
6 extent that Evergy can provide that AMI data it has in
7 its possession now it's useful for Staff to learn the
8 format and limitations of the billing data that Evergy
9 is retaining.

10 The order the Staff is asking for in this case
11 is necessary to move Evergy forward on its path to fully
12 utilize the AMI its customers are already paying for.

13 Evergy should provide its customers with rates
14 that more accurately reflect cost causation and to
15 inform customer decisions about when and how to use
16 energy. Evergy's rates should ensure the customers
17 causing more costs bear those costs and that customers
18 who are causing fewer costs see appropriate savings in
19 their energy bills.

20 That is not where we are at right now. Evergy
21 began deploying AMI meters in 2014, but Evergy's
22 customers still do not have the price signals
23 unavailable under Time of Use rates and still have not
24 been sufficiently educated on the concepts that in
25 general energy used during the daytime is more cost

1 intensive and energy used during the night is less cost
2 intensive.

3 To achieve the goal of cost effective Time of
4 Use rates that educated customers can benefit from,
5 Staff recommends that the Commission order Evergy to
6 comply with the Commission orders and Staff
7 recommendations issued in previous cases. In Case
8 ER-2016-0156, the Commission approved a stipulation
9 requiring Evergy West then operating as Evergy GMO --
10 I'm sorry, KCP&L GMO to file a case that included GMO's
11 proposal to make Time of Use rates available to all
12 customers, including a study of applicable Time of Use
13 determinants and a study of the reasonableness of
14 modifying GMO's seasonal rates to establish rates for
15 peak winter months separate from the spring and fall
16 shoulder months including applicable billing terms.

17 In Case No. ER-2018-0146, Staff recommended
18 the promulgation of a Time of Use rider for Evergy's
19 general service classes and large power service class.
20 In Case No. ER-2018-0145 and 0146, Staff recommended
21 implementations of a low impact, low differential, long
22 time period Time of Use rate design to begin sending a
23 price signal to customers and introduce the concept that
24 in general energy used during the daytime is more cost
25 intensive and energy used during the nighttime is cost

1 intensive.

2 In that case, Evergy's evidence showed that an
3 AMI meter is insufficient for a customer to benefit from
4 Time of Use rates and that educational programming is
5 necessary for customers to benefit from Time of Use
6 rates. But Evergy did not provide evidence in that case
7 explaining how Evergy proposed to educate its customers
8 on Time of Use rates and Evergy provided no testimony
9 explaining how pilot Time of Use rates might transition
10 to permanent Time of Use rates.

11 From Staff's perspective, the status quo is
12 not acceptable. The path to effective Time of Use rates
13 that can benefit customers is the path proposed by Staff
14 and ordered by the Commission since 2016. Staff asks
15 the Commission to order Evergy to include a proposal to
16 make Time of Use rates available to all customers and
17 all classes in its direct filings in its next general
18 rate case.

19 These Time of Use rates should be designed to
20 more accurately recover costs than current rates without
21 being so aggressive as to adversely impact customers who
22 are unable to shift their demand, shift their usage or
23 significantly impact the revenue recovery.

24 To design effective Time of Use rates that
25 will benefit customers, Evergy's proposal must include

1 four key features. First, customer notices and
2 education. Second, applicable Time of Use determinants.
3 Third, establishment of separate winter rates and
4 shoulder rates. And fourth, the meter and usage data on
5 the exhibit that I would propose to circulate by email.
6 So with those four features, that's really where we want
7 Evergy's filing to go and to provide Time of Use rates
8 that are useful for customers. Are there any questions?

9 JUDGE PRIDGIN: Mr. Stokes, thank you. Let me
10 see if we have any bench questions. Mr. Chairman, any
11 questions or comments? He may be on mute. I'm sorry.
12 Go ahead.

13 CHAIRMAN SILVEY: No questions, Judge. Thank
14 you.

15 JUDGE PRIDGIN: Thank you. Commissioner Rupp,
16 any questions?

17 COMMISSIONER RUPP: Thank you, Judge. I
18 appreciate it. For the court reporter, this is
19 Commissioner Rupp. Thank you, Mr. Stokes, for that list
20 of things that you have recommended that the Commission
21 order. Did I hear in that list that the Commission
22 should have the Company file opt-out TOU rates for
23 residential customer classes?

24 MR. STOKES: Defaults, opt-out, yes. I'm
25 sorry. Default. Not opt-out. My apology.

1 COMMISSIONER RUPP: So was one of your
2 recommendations to have opt-out -- to have default TOU
3 rates?

4 MR. STOKES: Maybe I can have Ms. Lange with
5 Staff explain a little bit more in detail what we're
6 proposing.

7 COMMISSIONER RUPP: I just wanted a
8 clarification. You don't have to go into details. I
9 was trying to listen and write down. I just wanted to
10 see if one of your recommendations was to have the
11 Company file opt-out TOU rates?

12 MS. LANGE: Sure. And at a high level they
13 would not be opt-out rates, they would be the generally
14 applicable rates. I don't think Staff is opposed to
15 continuation of exploring more complex time variant
16 designs. So in a sense you could opt-out of the default
17 TOU rate to a more complex time variant rate, but our
18 intent is, as we've expressed in a number of dockets, is
19 to do away with the time insensitive rates that
20 currently most customers pay.

21 COMMISSIONER RUPP: Okay. So even though like
22 you guys agreed in the Ameren case you agreed to opt-out
23 TOU rates, you're not recommending that the Commission
24 order Evergy to do the same?

25 MS. LANGE: I think that we are -- what we are

1 recommending in this case is for Evergy to present
2 proposals for a rate case and I think what those results
3 would need to be would be questioned subject to
4 litigation in that rate case, and I'm not trying to
5 dodge your question there. It is a very dicey area
6 there on what we can order outside of a general rate
7 case or request you to order outside of a general rate
8 case.

9 COMMISSIONER RUPP: Technically I think you
10 can request anything; we just don't have to do it. So
11 would there be a -- what are your thoughts on having the
12 Company's proposed option two on the Time of Use rates
13 having those be opt-out instead of opt-in?

14 MS. LANGE: I'll take my mask off with risk to
15 my colleagues in my room here. At this point I think
16 that customers outside of the very small less than 1
17 percent of Evergy customers who've experienced those
18 Time of Use rates do not have the education and the
19 background to be prepared for the adverse bill impact
20 that those rates would cause if more broadly deployed or
21 or deployed as an opt-out. We would be very concerned
22 about adverse customer impacts that those were -- if
23 rates of that magnitude were the first step for these
24 customers.

25 COMMISSIONER RUPP: Okay. I think that was

1 all the questions I had for Staff. Thank you, Judge.

2 JUDGE PRIDGIN: Commissioner Rupp, thank you.
3 Commissioner Coleman, any questions?

4 COMMISSIONER COLEMAN: I have no questions.
5 Thank you.

6 JUDGE PRIDGIN: Commissioner Holsman, any
7 questions? I don't know, Commissioner Holsman, if
8 you're still with us or if you're on mute. Let me give
9 you another chance. Commissioner Holsman. Commissioner
10 Kolkmeier, any questions?

11 COMMISSIONER KOLKMEYER: No, Your Honor, not
12 at this time.

13 JUDGE PRIDGIN: All right. Thank you. I
14 think I just have a brief question for Staff and I think
15 I'd asked a similar question of the Company. Is it true
16 that even before filing this report that customers have
17 the opportunity to make prepayments now?

18 MS. LANGE: So Judge, the best person to
19 answer that probably isn't in the room, but it's our
20 understanding that any customer could, if you will,
21 overpay an existing bill or make a payment to the
22 Company. I'm not aware of any provisions that they have
23 that would cause that to be refunded and not applied to
24 a future balance, but we learn something new everyday
25 about these companies' billing system. To our

1 knowledge, yes, you could prepay.

2 JUDGE PRIDGIN: Okay. Thank you, Ms. Lange.
3 Anything further from the bench before we move on to
4 Public Counsel? All right. Hearing nothing.
5 Mr. Williams or Dr. Marke, whoever wants to present,
6 whenever you're ready.

7 DR. MARKE: I think that will be me, Your
8 Honor. Can you hear me?

9 JUDGE PRIDGIN: I can. Go ahead.

10 DR. MARKE: Excellent. Thank you. Thank the
11 Commission for having this opportunity to address all of
12 you. We filed about eight pages of comments in this
13 docket that I think clearly express where we're at in
14 terms of where we stand on Time of Use in particular
15 with Evergy. I'd like to take this opportunity -- I
16 made some notes here of just what I've heard and just
17 summarized some of the key points. First of all, let's
18 focus on the positives.

19 A 4 to 9 percent reduction in demand is great.
20 A 5 to 10 percent reduction in energy consumption for
21 general residential customers in a 3 to 6 percent
22 reduction in energy consumption for electric space
23 heating customers, if we saw anywhere near those results
24 in any of our MEEIAs, we would be doing backflips.
25 Those are great, great numbers, and it speaks to the

1 power of pricing electricity as close as we can to its
2 actual cost of service.

3 However, I'd like to focus on a couple things
4 that I've heard today and some apprehensions that we
5 have moving forward. First of all, I'd be remiss if I
6 didn't point out that we've had a number of studies over
7 the course of the past six years. My memorandum
8 identified at least 13 studies. Based off of the power
9 point that I saw earlier today, there could be more that
10 I'd be adding to that.

11 We've had at least two rate cases, coming up
12 on our third one, hundreds of millions of dollars in
13 hardware, hundreds of millions of dollars in software.
14 We do have utilities now that are moving towards
15 mandatory Time of Use.

16 Look no further than the state of California
17 that implemented mandatory Time of Use this year. To
18 address the education for a second, I think the Company
19 has invested an enormous amount of capital and time and
20 resources in customer education, coaching, bill
21 analysis, customers facing on their website. We had a
22 total of 5,538 customers between the two utilities that
23 participated in this.

24 I think roughly 1,700 dropped out at some
25 point due to moving or other issues. If I calculated it

1 correctly, based off of Mr. Lutz's earlier power point,
2 noted that there was a 42 percent unique user click in
3 terms of their coaching. That means 42 percent of the
4 5,000 plus customers would have clicked on and followed
5 up with that coaching. That equates to roughly 2,326
6 customers. Of that, of those customers, how many
7 customers still continue to click on it after that first
8 month or after that initial click? According to the
9 power point, it was 61 percent. So this would lower
10 that number even further down to 1,400 customers. 1,400
11 customers out of a little over 5,500 customers comes out
12 to about 25 percent of the customers that were utilizing
13 this technology.

14 I point that out there to illustrate that this
15 sample that we're seeing here, this roughly 1 percent of
16 customers that participated in the pilot program may not
17 be representative of the entire population. Generally
18 customers that would have jumped at the chance to
19 participate in a pilot program, and we know that, for
20 example, there were a lot of like company participants
21 in this pilot program, aren't necessarily the average
22 Everygy customer.

23 So we should probably par back the overall
24 results that we might get a little bit. However, again
25 being spread out to 500,000 plus customers, you're going

1 to see significant energy and demand savings if we were
2 to price electricity more towards actual cost of
3 service.

4 I'd like to speak a little bit about the
5 benefits of AMI technology. And by benefits I'm going
6 to use the quotes here. We have been critical of
7 utilities in the past of moving forward with AMI
8 technology and not utilizing the full benefits that are
9 available to customers.

10 Based off of feedback earlier from Mr. Lutz,
11 the two things that I heard, in addition to what, you
12 know, customers received in terms of benefits were both
13 billing and data. I'd like to address billing first.
14 To recall our last general rate case, billing was a
15 central issue, billing problems were a central issue.
16 That was the conversion into the billing software that
17 we're speaking of.

18 Commission may recall that there was a
19 change.org petition at that time. If not, you can
20 simply Google change.org and do the search word for
21 KCPL. If you were to click on KCPL audit change.org,
22 over 68,000 customers signed a change.org petition in
23 part towards the Commission and to express their
24 dissatisfaction with both the price of electricity and
25 in particular the billing system that was in play.

1 We had continual billing problems earlier this
2 year where KCPL customers had to go ahead -- KCPL had to
3 suspend their disconnections due to billing issues. In
4 terms of data, the Company has cited that the increased
5 amount of data that AMI has allowed the Company to
6 obtain. I would merely point out that the Staff report
7 goes to great lengths in pointing out that that data has
8 not been shared and that the stipulations have not been
9 met to date. So data is an issue and it is an issue
10 that is clearly plaguing this case and is a concern
11 moving forward in terms of sharing that data.

12 On the last point, there was an issue of
13 benefits and peak time rebates was raised as a potential
14 option. There were questions as to electrification, you
15 know, different types of rate designs that were missing
16 from this overall portfolio and peak time rebates was
17 raised.

18 Mr. Lutz stated that this was a dialogue
19 that's taking place currently in MEEIA. I'm aware of no
20 such dialogue with peak time rebates in any discussions
21 I've had with the Company as regards to MEEIA. This is
22 news to me.

23 Next thing I'd like to just address is the
24 Rate Modernization Plan. So the plan includes not only
25 the two Time of Use rates that are being posited out

1 there, but I'd like to spend just a brief moment
2 speaking to the other rates which include the
3 consolidation which is something that our office is most
4 definitely in favor of. We filed now in multiple rate
5 cases on the importance and the cost savings that can
6 come from consolidation of Evergy West and Evergy Metro.

7 In terms of the Subscription + program, I
8 would agree with Mr. Lutz insofar as that the
9 subscription program by itself is not a favorable rate
10 design. Let me break that down for you.

11 A subscription by itself would just be a flat
12 fixed fee. This is the equivalent of just a buffet
13 style price signal. You pay a hundred dollars a month.
14 You use as much electricity as you want. This is the
15 antithesis of a Time of Use rate. The plus is a larger
16 question mark. Mr. Lutz has posited that Lon Huber from
17 Duke, you know, the mastermind behind the Netflix style
18 subscription pricing, might be something that Evergy
19 would be interested in doing. Again, this is the first
20 I've heard of this. We'll definitely be interested in
21 hearing exactly what the Company would be putting on top
22 of that.

23 I would point out just as it is right now a
24 subscription program is not dependent on AMI technology.
25 As to prepay, I routinely pay more for my electric bill

1 than I need to. And that money is then knocked off
2 through my next month's bill. The only difference
3 between that and prepay as an offered program would be
4 the ability to disconnect a customer quicker. That's
5 it.

6 In terms of low income solar, we welcome the
7 Company and again whether or not stipulations are
8 followed up or not, you know, that is one that the
9 Company has put forward that they're going to do. So we
10 encourage the Company to engage stakeholders as soon as
11 possible over the low income solar, because as I can
12 imagine, that is going to be of much interest to a lot
13 of advocates.

14 Finally, I'd just like to focus on -- Let me
15 speak a little bit to Staff comments in terms of the
16 opt-out rates and the opt-out rate default because that
17 is an issue that -- a recommendation that OPC made in
18 this case. I believe we specifically asked for the
19 Commission to give us guidance in terms of Evergy and
20 Staff and intervenors to propose an opt-out default
21 option, a reasonable opt-out default option, and the key
22 word I'm going to focus on there is the term reasonable.
23 And not to put words into Staff's mouth, but this is my
24 interpretation of Staff's position on this that an
25 opt-out -- that the training wheels approach of a Time

1 of Use rates, which is similar to what Ameren has right
2 now, is the preferred method moving forward; that this
3 is due to the lack of time and education having
4 customers largely get used to a day/night rate and
5 slowly acclimating them into larger differentials is the
6 preferred way to move forward. We recommended an
7 opt-out option merely if those differentials were
8 larger. Obviously in a rate case and whatever is put
9 forward there, the rate case -- the record will speak
10 for itself and parties are free to argue one way or the
11 other.

12 We would agree that in general that we need to
13 move towards a mandatory Time of Use option. If the
14 differentials were greater than what, for example,
15 what's included in today's Ameren case, I would put
16 forward that the opt-out option would be preferred. And
17 again, that's OPC speaking here. I'm not speaking for
18 Staff on that, but from our vantage point it would be
19 over concerns over customers having a larger bill than
20 they otherwise would.

21 Again, with the differentials we're talking
22 about here, they're relatively small. That is the idea
23 behind the training wheel approach. I can clarify this
24 in follow up questions if there any. Finally, I'd like
25 to emphasize that OPC is really looking for the

1 Commission -- for the Commission's guidance here, and
2 whether that request is followed through or not that's
3 our request.

4 Again, two rate cases, hundreds and hundreds
5 of millions of dollars, double digit studies by third
6 parties mind you, multiple third parties again because I
7 hear we're engaged with the Brattle Group again to go
8 ahead and look at more studies. This is not counting
9 the focus groups. This is not counting the surveys that
10 we've put out there. If we were to add all of those
11 dollars together relative to the actual number of
12 customers that have participated in this program, the
13 cost benefit ratio would be out of sync.

14 The costs would far outweigh the actual
15 benefits that have been produced. The Commission is in
16 a perfect opportunity to reverse this trend and move
17 forward and to realize the savings and the benefits that
18 AMI can bring forward. We hope that the Commission
19 gives us guidance on that issue. It's the end of
20 September right now. Rates would -- If the Company is
21 they put forward publicly they plan to file, you know,
22 in the first quarter of 2022, rates, you know, you're
23 not looking for rates to go into effect probably for
24 about a year from now. A year from now seems like a
25 reasonable amount of time for the Company to start

1 engaging customers in education. A year from now seems
2 like a reasonable amount of time to start really
3 following up with all of the money that we've already
4 invested. I'm not even just speaking about the
5 hardware, but the software, the websites, the coaching,
6 all of this. They're in a very unique position to move
7 forward with that. My big concern is that a year from
8 now we will have another pilot, we will have another
9 study, and we will continue this process indefinitely.

10 So the ask here is, you know, at a minimum
11 really just to move forward and having the Company
12 propose something that was similar to what was agreed to
13 in the last Ameren rate case. A company that hasn't
14 realized this sort of return on and of AMI investments
15 like Evergy has but is moving forward with a much more
16 proactive AMI Time of Use rollout.

17 I'll leave my comments there. If there are
18 any questions, be more than happy to answer anything.
19 Thank you.

20 JUDGE PRIDGIN: Dr. Marke, thank you. Let me
21 see if we have any bench questions. Mr. Chairman, any
22 questions?

23 CHAIRMAN SILVEY: No questions.

24 JUDGE PRIDGIN: Thank you. Commissioner Rupp?

25 COMMISSIONER RUPP: Yeah, I'll never miss the

1 opportunity to speak with the good Dr. Marke. First
2 off, thank you, Doctor. I really appreciate how you
3 started with a positive and you really kind of did take
4 the step back that we all kind of do need to see. And
5 that's hat tip and hand claps to the Company. You guys
6 did a good job on educating people. You did a great job
7 with your Wait 'til 8 and people understood it and you
8 saw the reduction in energy. You saw the reductions
9 that were impressive. Dr. Marke, you said if we saw
10 those in a MEEIA program, we'd be super happy. That's a
11 great line. I mean, we would be. And now we're looking
12 at this going well. So I believe that the Company has
13 the opportunity now, and I think the Commission should,
14 and I would encourage all intervenors, all third
15 parties, all Staff, all OPC, all witness, anybody that
16 even has a remote interest in this case to put forth
17 some form of a reasonable opt-out default option of TOU
18 for the Commission to consider.

19 If that is presented, it will be heavily
20 considered by certain Commissioners, and I believe we've
21 seen this already done in the other side of the state.
22 So I encourage that. You are asking for direction
23 hopefully that will serve as some direction. But
24 Dr. Marke, I guess my question to you is in the
25 legislature when there's an issue that you don't want to

1 deal with, what do you do to it?

2 DR. MARKE: You punt it.

3 COMMISSIONER RUPP: You study it.

4 DR. MARKE: That too.

5 COMMISSIONER RUPP: You create an interim
6 committee over the summer. You appoint some people and
7 you study.

8 DR. MARKE: Right.

9 COMMISSIONER RUPP: And the fact that we've
10 had 13 studies, 11 studies, however many, all of us on
11 the Commission we're in the legislature they all know
12 the answer that when you don't want to deal with
13 something, you study it. And Bill Kenney is not here,
14 but this is the most like picturesque, quintessential
15 issue of kicking the can down the road that we have ever
16 seen here in the Commission. Multiple years, 13
17 studies, two rate cases, open dockets and hearings and
18 things of that nature and here we are at the same thing
19 and now we're talking about not even doing as much as
20 what we did six months ago, a year ago with the other
21 side of the state. So I guess my question is more of a
22 comment. Thank you for bringing back the big picture
23 and helping us realize the great job that the Company
24 did do in achieving these metrics with their program,
25 and they've proven that they can do it, they've proven

1 that the customers will respond. It's time to just let
2 them run and let them run with this. Thanks again for
3 being an advocate for these issues and hopefully you'll
4 have the guidance that you're looking for to come up
5 with some type of reasonable opt-out default option for
6 us to consider. Thank you.

7 DR. MARKE: Thank you.

8 JUDGE PRIDGIN: Commissioner Coleman, any
9 questions?

10 COMMISSIONER COLEMAN: No questions, Judge.
11 Thank you.

12 JUDGE PRIDGIN: Commissioner Holsman, I'm not
13 sure if you're still with us. Just in case,
14 Commissioner Holsman, any questions? Commissioner
15 Kolkmeier, any questions?

16 COMMISSIONER KOLKMEYER: No questions, Judge.
17 Thank you.

18 JUDGE PRIDGIN: I think I just maybe have one
19 or two quick questions. Does Public Counsel have any
20 feedback regarding the Company's shadow billing or have
21 any recommendations on how the Company could improve
22 that?

23 DR. MARKE: I don't off the top of my head,
24 Your Honor, but, you know, if something novel comes,
25 we'll be sure to file it in this docket.

1 JUDGE PRIDGIN: Evergy's report discusses the
2 possibility of offering a subscription pricing option.
3 Are you familiar with any similar programs that other
4 utilities have offered across the country?

5 DR. MARKE: I am familiar with the Duke
6 Florida that Mr. Lutz referenced, and I would direct the
7 Commission and interested parties, there's definitely
8 some good writeups in some of the trade journals like
9 Mr. Lutz was talking about, Utility Dive, and probably
10 if you'd just search the word Netflix, you'd find it,
11 but the idea is that you'd have some sort of fixed fee
12 and additional add-ons. In this case, it might be a
13 free thermostat and you would be obliged to go ahead and
14 also have events called. That would be the subscription
15 plus this. So there's something additional that would
16 come to it.

17 I'm curious what the Company means by it
18 because the report itself doesn't go into any great
19 lengths about the Subscription + program. You know, the
20 one concern that we would have is that a lot of the
21 plusses are already being realized or offered in other
22 programs like MEEIA, for example.

23 JUDGE PRIDGIN: All right. Thank you,
24 Dr. Marke. I don't think I have any further questions.
25 Anything further from the bench or from the parties

1 before we wrap up this on-the-record presentation?

2 MR. FISCHER: Judge, on behalf of the Company,
3 I want to thank everyone for giving us the opportunity
4 to be here today and to discuss these issues. I'm
5 getting excited about all the next rate cases and all
6 the discussions that will be continuing in that context.
7 This has certainly been an informational docket, and I
8 think Mr. Lutz and Ms. Winslow did a good job of
9 exploring and explaining to the Commission the Company's
10 plans for the future in that rate case and how we're
11 taking steps to modernize our rate structure.

12 We don't have any request to change rates at
13 this docket. It's not a contested case. And I don't
14 think we really got formal evidence to support an order
15 coming out of the Commission here, but we're very
16 grateful for the opportunity to give you a preview of
17 what's coming in the next rate cases in the next year.
18 I would offer, if it would be helpful to the Commission,
19 that we'd be happy to file that presentation in EFIS and
20 provide a copy of those to all the parties of the
21 presentation we made today if that would be helpful.

22 JUDGE PRIDGIN: I expect that what -- Mr.
23 Fischer, I appreciate the offer and I would appreciate
24 if that gets filed in EFIS.

25 MR. FISCHER: I tried to take notes as quickly

1 as I could on what Staff was suggesting and I really
2 missed more points than I got I think. I think it would
3 be inappropriate for the Commission to issue an order
4 like what Staff is asking here. There's no evidence to
5 support an order like that. While we're certainly
6 interested in the guidance of the parties and what
7 they'd like to see, I think the appropriate place to
8 debate these issues is going to be in the next rate
9 case. We're looking forward to doing that, to moving
10 forward, and I appreciate many of the comments that were
11 made from the Commission and the Staff and Public
12 Counsel too about the progress that we're making here.
13 Thank you very much for that.

14 JUDGE PRIDGIN: Anything further either from
15 the bench or from the parties? All right. Hearing
16 nothing, then we will go off the record in this
17 on-the-record presentation. Thank you so much. We are
18 off the record.

19 (Off the record.)
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