

law to conduct business in the State of Missouri, was filed with the Commission in Case No. EN-2020-0064 and is incorporated herein by reference in accordance with 20 CSR 4240-2.060(1)(G). Evergy Missouri West's fictitious name registration was also filed in Case No. EN-2020-0064 and is incorporated herein by reference.

3. In addition to the undersigned counsel, all correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

Darrin R. Ives
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4. Neither Evergy Missouri Metro nor Evergy Missouri West have any pending actions or final unsatisfied judgments or decisions against them from any state or federal agency or court, which involve customer service or rates, which action, judgment, or decision has occurred within three years of the date of the Application, except for:

- (i) Docket No. EC-2020-0079, *Unice Harris v. Kansas City Power & Light Company*;
- (ii) Docket No. EC-2020-0088, *Patricia Sue Stinnett v. Kansas City Power & Light Company*.

5. Joint Applicants have no annual reports or regulatory assessment fees that are overdue in Missouri.

6. 20 CSR 4240-13.020 (9) states in part, “Every bill for residential utility service shall clearly state (A) The beginning and ending meter readings of the billing period and the dates of these readings[...].”

7. Utility bills issued with beginning and ending registered reads are losing relevance as utilities are adopting Time of Use (“TOU”) rates, dynamic rates, and installing interval or electronic meters for billing purposes. Evergy Missouri Metro and Evergy Missouri West requested and received permission from the Commission to offer TOU rates in Docket No. ER-2018-0145 and Docket No. ER-2018-0146 respectively. The TOU rate has three daily pricing periods (off-peak, super off-peak, on-peak) and a different rate is applied to each period. As a result, it is necessary to have interval meter data (i.e., the usage within each of the three daily pricing periods) in order to bill a customer using a TOU rate. The beginning and ending registered meter reads measuring the cumulative usage over the month are not relevant to the calculation of the customer’s bill under a TOU rate. What is important is the number of kWh consumed in each time period (e.g., on peak or off-peak). Due to rounding, the cumulative sum of a meter’s interval data and the total usage indicated by the difference between its beginning and ending reads can produce slightly different totals when used to calculate a customer’s usage. Though the difference is small, showing both the interval usage and beginning and ending meter reads on a customer’s bill could produce different results and would cause confusion for the customer.

8. For customers who continue to have non-AMI meters in place, the Company will continue to comply with 20 CSR 4240-13.020(9)(A) and provide the beginning and ending meter reads for the period on a customer’s bill. However, the Company is requesting a waiver with respect to this requirement for customers on the TOU rate that have AMI meters in place.

9. For customers on the TOU rate with AMI meters, the Company requests that the Commission allow the Company to include the interval data provided by the AMI meter on the customer's bill without also providing the beginning and ending meter reads for the billing period.

10. Evergy Missouri West tariff sheet R-39 requires the inclusion of the billing and ending meter reads. Attached as Exhibit A is an exemplar tariff sheet consistent with this Application. Evergy Missouri West will file compliance tariffs following Commission approval of this Application.

11. No public utility will be affected by the approval of this variance request.

12. The Company requests that the Commission issue an order in this docket within 30 days of the date this Application is filed. There will be no negative effect on the Company's customers or the general public if the Commission acts by this date. This application was filed as soon as it could have been.

13. 20 CSR 4240-4.017(1) states in part:

(1) Any person that intends to file a case shall file a notice with the secretary of the commission a minimum of sixty (60) days prior to filing such case. Such notice shall detail the type of case and issues likely to be before the commission and shall include a summary of all communication regarding substantive issues likely to be in the case between the filing party and the office of the commission that occurred in the ninety (90) days prior to filing the notice.

The Company seeks a waiver of this rule requirement. Good cause exists, pursuant to 20 CSR 4240-4.017(1)(D), to grant a waiver of 20 CSR 4240-4.017(1), because the Company has no communication with the office of the commission within the prior 150 days regarding any substantive issue likely to be in the case.

WHEREFORE, Evergy Missouri Metro and Evergy Missouri West respectfully request that the Commission issue an order waiving the portion of Section 20 CSR 4240-13.020(9) (A) discussed above.

Respectfully submitted,

/s/ Roger W. Steiner


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**ATTORNEYS FOR EVERGY
MISSOURI METRO AND EVERGY
MISSOURI WEST**

VERIFICATION


STATE OF MISSOURI)
)
COUNTY OF JACKSON) ss

Darrin Ives, being first duly sworn, on his oath and in his capacity as Vice President – Regulatory Affairs of Evergy, Inc., states that he is authorized to execute this Application on behalf of Evergy Missouri Metro and Evergy Missouri West, and has knowledge of the matters stated in this Application, and that said matters are true and correct to the best of his knowledge, information and belief.



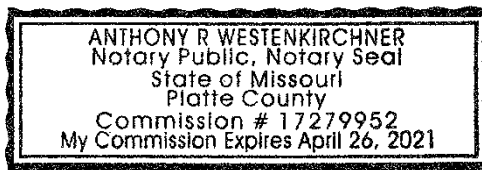
Darrin Ives

Subscribed and sworn to before me this 12th day of November 2019.



Notary Public

My Commission Expires:
 4/26/2021



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been emailed to the Office of the General Counsel and the Office of the Public Counsel this 12th day of November 2019.

Roger W. Steiner

Roger W. Steiner

~~KCP&L GREATER MISSOURI OPERATIONS COMPANY~~ EVERGY MISSOURI WEST

P.S.C. MO. No. 1 2nd3rd Revised Sheet No. R-39
Canceling P.S.C. MO. No. 1 1st2nd Revised Sheet No. R-39

For Missouri Retail Service Area

RULES AND REGULATIONS
ELECTRIC

6.04 Billing and Payment Standards (Continued)

F. A monthly-billed customer shall have at least twenty-one (21) days from the rendition of the bill to pay the electric charges. If the due date or delinquent date falls upon a Sunday, legal holiday, or any other day when the offices of Company regularly used for the payment of customer bills are not open to the general public, the due date or delinquent date shall be extended through the next business day. The date of payment for remittance by mail is the date on which Company receives the remittance. Company shall not base an assessment of a deposit or delinquent charge, or a discontinuance of service, on a payment that was made to a payment agent on or before the due date or delinquent date.

G. Every bill for residential electric service shall clearly state the following:

- (1) The beginning and ending meter readings of the billing period and the dates of these readings; however, as provided below for customers billed under a residential time-variant rate schedule, the company shall use interval metering data.

Residential Time-Variant Rate Schedule Procedures: For residential rate schedules which require cumulative usage be determined for unique time periods during a billing period and usage is determined through interval metering data, beginning and ending meter readings for that billing period may not be utilized in lieu of the interval metering data. In such cases, a customer's bill will reflect the total consumption for each relevant time period but will not indicate a beginning or ending meter reading for the cumulative billing period, pursuant to the variance from Rules 20 CSR 4240-13.020 (9) (A) granted by Commission in File No. _____ . The Company will retain for a minimum of five years the meter information relied upon to generate bills for such customers.

- (2) The date when the bill will be considered due and the date when it will be delinquent, if different.
 - (3) Any previous balance that states the balance due for electric charges separate from charges for services not subject to Commission jurisdiction.
 - (4) The amount due for the most recent billing period for electric usage stated separately from the amount due for the same period for a deposit and the amount due for the same period for service not subject to Commission jurisdiction.
 - (5) The amount due for other authorized charges.
 - (6) The total amount due.
 - (7) The telephone number the customer may call from the customer's service location without incurring toll charges and the address of Company where the customer may initiate an inquiry or complaint regarding the bill as rendered or the service provided. Charges for measured local service are not toll charges for purposes of this Rule.
 - (8) License, occupation, gross receipts, franchise, and sales taxes.
- H. Normally bills will be sent by mail; however, the Company reserves the right to deliver bills or to use electronic posting for qualified customers at their request. The non-receipt of a bill by a customer shall not release or diminish the obligation of the Customer with respect to the full payment thereof, including penalties and interest.

Issued:
Issued by: Darrin R. Ives, Vice President

Effective:
1200 Main, Kansas City, MO 64105