

Public Version



Legal Department

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January 7, 2022

VIA EMAIL:

Morris.Woodruff@psc.mo.gov

Mr. Morris Woodruff
Secretary of the Commission
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, MO 65102

RE: Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”); File No.: ER-2022-0130

Dear Mr. Woodruff:

Filed concurrently with this letter is a separate letter with which is included certain tariff sheets consisting of electric rate schedules designed to increase Evergy Missouri West, Inc. d/b/a Evergy Missouri West’s (“Evergy Missouri West”) electric base rate annual revenues by approximately \$59.8 million. The above-cited figures are exclusive of applicable gross receipts, sales, franchise or occupational fees or taxes. The proposed tariff sheets bear a date of issue of January 7, 2022, and an effective date of February 6, 2022.

The test year employed by the Company is the 12 months ending June 30, 2021, with certain pro-forma adjustments to include known and measurable items through May 31, 2022, the true-up cutoff date the Evergy Missouri West is requesting in this case, as discussed in the direct testimony of Evergy Missouri West witness Ron Klote.

The rate increase sought by this filing is driven by several factors. These include infrastructure investment to improve reliability and enhance customer service as well as property taxes. This filing incorporates other changes in the Company's revenue requirement since base rates were last reset.

Also included herein or in Schedules to this letter is the information required by 20 CSR 4240-3.030(3)(B), as follows:

3(B)1. See Schedule 1.

3(B)2. See Schedule 2.

3(B)3. See Schedule 3.

3(B)4. See Schedule 4.

3(B)5. See Schedule 5.

3(B)6. See attached press release.

3(B)7. To reflect changes in net base energy costs, rate base, and other operating and maintenance expenses, to continue the Company's fuel adjustment clause, and to make changes to rate design offerings for customers.

As required by 20 CSR 4240-2.065(1), this filing includes Evergy Missouri West's direct testimony relating to this general rate increase request. Direct Testimony is provided by the following witnesses:

<u>Witness Name:</u>	<u>Topics:</u>
Michael Adams	Property Tax Tracker, Lead/Lag Study
Bruce Akin	Reliability Report, Storm Reserve, Distribution System Investments
Kirkland Andrews	Capital Structure, Cost of Debt, Proposed Return on Equity ("ROE")
Albert Bass	COVID Demand Impact on Test-Year, Weather Normalization, Advanced Metering Infrastructure ("AMI")
Ann Bulkley	Cost of Capital, Capital Structure, ROE
Charles Caisley	Customer Service and Experience, Community and COVID-19 Response, Economic Relief Program, Dollar Aid, Time Of Use ("TOU")
Jim Fluke	Transmission ROE, Transource
Melissa Hardesty	Excess Deferred Income Taxes ("EDIT"), Current Tax and Accumulated Deferred Income Tax ("ADIT"), Potential Federal Tax Increase, Property Tax
Ryan Hledik	Subscription Pricing
Darrin Ives	Policy and Overview, Merger Commitments, Storm Reserve, Major Maintenance, Sibley Accounting Authority Order ("AAO"), Property Tax, Bad Debts, Rate Modernization and Clean Charge Network ("CCN")
Larry Kennedy	Sibley Retirement
Ronald Klote	Plant In Service Accounting ("PISA"), Pay As You Save ("PAYS®") Program, Sibley AAO, COVID AAO, Pension Issues, Storm Reserve, MO/KS Allocators, Allocations, Oher Misc. Accounting Adjustments
Jeffrey Kopp	Decommissioning Studies
Bradley Lutz	Community Solar, Green Power, Tariff Issues, Class Cost Of Service ("CCOS"), TOU, AMI
Marisol Miller	Annualized/Normalized Revenues, CCOS, Tariffs, Rate Design
Linda Nunn	Electric/Steam Allocation Factors, Fuel Adjustment Clause ("FAC"),

	Line Loss Study, NUCOR, Other Misc. Accounting Adjustments Electric/Steam Allocation Factors, FAC, Line Loss Study, Bad Debts, NUCOR, Misc. Accounting, Allocations, Test-Year, MFRs
Eric Peterson	Fuel Expense, Purchased Power Expense, Wholesale Sales, FAC Support
John Spanos	Depreciation Studies
Jessica Tucker	Fuel and Emissions Prices, Fuel and Emissions Costs, Fuel Inventories FAC Support including Hedging
Kimberly Winslow	Rate Modernization Plan, Time of Use Rates, Business Transportation Electrification, Residential Battery Energy Storage Pilot, Low-Income Solar Subscription Pricing Pilot, Green Pricing RECs, Low-Income Weatherization, Market Based Demand Response (“MBDR”), Chapter 13 Variances

Also included with this letter is a verification as required by 20 CSR 4240-22.080(18) and gross receipts tax information required by 20 CSR 4240-10.060.

Also attached to this letter as Schedule KHW-1 is a list of variances from 20 CSR 240-13 (Chapter 13 Billing Practices rules) and justification for the variances related to the Company’s request to implement a Subscription Pricing and other pre-pay pilot programs.

I request that you please bring this filing to the attention of the appropriate Commission personnel and see that a copy of all correspondence, notices, orders or other communications in connection with this matter and proceeding are furnished to the undersigned counsel for the Company at the address listed in the letterhead above, and also to the following persons:

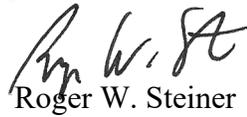
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Thank you for your assistance with this filing. Should you have any questions, please contact me.

Sincerely,



Roger W. Steiner

RWS/arw

cc: Counsel for Staff of Missouri Public Service Commission
Counsel for Office of the Public Counsel
Counsel representing residential customers in File Nos. ER-2018-0145 and ER-2018-0146, and newspapers with largest circulation in each county within the Company's service area, sent by First Class Mail, pursuant to 20 CSR 4220-13.065(2).

INFORMATION FILED IN ACCORDANCE WITH
4 CSR-240-3.030 (3) (B) (1)

Aggregate Annual Increase

The aggregate annual increase over current revenues reflecting impacts before the rebasing of fuel for the fuel adjustment clause, is \$27.7 million or 3.85% for Evergy Missouri West jurisdiction. The aggregate annual increase over current revenues which the tariffs propose including the rebasing of fuel for the fuel adjustment clause is \$59.8 million or 8.31% for Evergy Missouri West. The tariffs also reflect a continuation of the fuel adjustment clause as approved in ER-2007-0004 including the rebasing of the net fuel cost. Within this fuel clause, recovery/return of the over/under net fuel spend as compared to that base will be collected/reimbursed at 95% of the difference.

INFORMATION FILED IN ACCORDANCE WITH
20 CSR-4240-3.030 (3) (B) 2

Names of Counties and Communities Affected by Proposed Electric Rate Increase

EVERGY MISSOURI WEST

Page 1 of 3

Andrew County

Amazonia
Bolckow
Cosby
Country Club Village
Fillmore
Flag Springs
Helena
Nodaway
Rea
Rochester
Rosendale
Savannah
Whitesville
Wyeth

Atchison County

Fairfax
Langdon
Phelps City
Tarkio
Watson
Westboro

Barton County

Burgess
Hannon
Iantha
Irwin
Lamar Heights
Milford

Bates County

Adrian
Amoret

Amsterdam
Foster
Hume
Merwin
Rockville
Virginia
Worland

Benton County

Blue Branch
Cole Camp
Ionia
Lincoln
Warsaw
Whitakerville
White Branch

Buchanan County

Agency
Armour
DeKalb
Faucett
Halls
Lewis & Clark
Maxwell Heights
Rushville
Saint Joseph
San Antonio
Sugar Lake
Wallace
Winthrop

Carroll

Norborne

Cass County

Archie
Baldwin Park
Belton
Creighton
Drexel
East Lynne
Freeman
Garden City
Gunn City
Lake Winnebago
Peculiar
Pleasant Hill
Raymore
Strasburg

Cedar County

Clay County

Glenaire
Liberty
Missouri City
Nashua
Paradise
Smithville

Clinton County

Gower
Grayson
Hemple
Trimble

Dade County

NW Rural

INFORMATION FILED IN ACCORDANCE WITH
20 CSR-4240-3.030 (3) (B) 2

Names of Counties and Communities Affected by Proposed Electric Rate Increase

EVERGY MISSOURI WEST

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Daviess

Jamesport
Lock Springs

DeKalb County

Clarksdale
Stewartsville
Union Star

Gentry County

Gentry
King City

Grundy County

Brimson
Dunlap
Edinburg
Laredo
Spickard
Tindall
Trenton

Harrison County

Blythedale
Cainsville
Eagleville
Martinsville
Mount Moriah
New Hampton
Ridgeway

Henry County

Blairstown
Brownington
Calhoun

Clinton
Deepwater
Montrose
Urich
Windsor

Holt County

Bigelow
Craig
Forbes
Forest City Fortescue
Maitland
Mound City
New Point
Oregon

Jackson County

Blue Springs
Buckner
Grain Valley
Grandview
Greenwood
Kansas City
Lake Lotawana
Lake Tapawingo
Lee's Summit
Levasy
Little Blue
Lone Jack
Oak Grove
Raytown
Sibley
Tarsney Lakes
Unity Village

Johnson County

Centerview
Chilhowee
Holden
Kingsville
Knob Noster
La Tour
Leeton
Montserrat
Pittsville
Postoak
Warrensburg
Whiteman AFB

Lafayette County

Bates City
Concordia
Dover
Higginsville
Lexington
Napoleon
Wellington

Livingston County

Chula

Mercer County

Mill Grove
Modena

Nodaway County

Arkoe
Barnard
Burlington Junction
Clearmont

INFORMATION FILED IN ACCORDANCE WITH
20 CSR-4240-3.030 (3) (B) 2

Names of Counties and Communities Affected by Proposed Electric Rate Increase

EVERGY MISSOURI WEST

Page 3 of 3

Clyde	<u>Ray County</u>	<u>Worth County</u>
Conception	Camden	Allendale
Conception Junction	Fleming	Denver
Elmo	Hardin	Grant City
Graham	Henrietta	Isadora
Guilford	Orrick	Sheridan
Hopkins	Richmond	Worth
Maryville	Swanwick	
Parnell		
Pickering	<u>Saint Clair County</u>	
Quitman	Appleton City	
Ravenwood	Lowry City	
Skidmore	Osceola	
Wilcox	Roscoe	
<u>Pettis County</u>	<u>Vernon County</u>	
Green Ridge	Arthur	
La Monte	Bronaugh	
Sedalia	Deerfield	
	Eve	
<u>Platte County</u>	Hardwood	
Bean Lake	Horton	
Beverly	Metz	
Camden Point	Milo	
Dearborn	Moundville	
Edgerton	Nevada	
Farley	Richards	
Ferrelview	Schell City	
Iatan	Sheldon	
New Market	Walker	
Platte City		
Tracy		

This file is CONFIDENTIAL as it contains individual, customer-specific data.

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Evergy Files Missouri Rate Review to Recover Costs to Modernize Grid, Improve Reliability and Enhance Customer Service

Ongoing savings from 2018 merger exceed projections,
reduce the rate increase request by more than half.

KANSAS CITY, Mo. – Jan. 7, 2022 — Today Evergy submitted a detailed rate review to the Missouri Public Service Commission (MPSC). The requested rate adjustment reflects investments to improve reliability, enhance customer service and enable the company's transition to cleaner energy resources.

Missouri law requires Evergy to file a rate review to update rates at least once every four years. If approved, this will be the first base rate increase for Evergy Missouri customers in more than five years. In recent years, Evergy has reduced operating costs and is passing savings on to customers in this rate review at levels greater than projected at the time of the merger. Including the current rate review request, throughout the last decade Evergy Missouri customers have experienced price increases that are well under the average annual rate of inflation for the same time period.

For Evergy Missouri Metro customers, the company is requesting approximately a 5.2% increase to its base rates. For Evergy Missouri West customers, the company is requesting approximately a 3.85% increase in base rates. The prices customers pay for electric service are calculated based on actual costs the company incurs. The filing today begins an 11-month process where regulators and interveners will review, audit and evaluate the request to assure the resulting prices reflect the cost of serving Evergy's Missouri customers. The process will include public hearings, which are yet to be scheduled. To justify any price increase, Evergy must demonstrate that the costs were warranted and prudent. For more information on Evergy's service areas, visit <https://www.evergy.com/manage-account/rate-information-link/service-areas>.

"Since Evergy was formed in 2018, reducing operational costs to help fund our investments and make our rates more competitive has been one of our primary goals," said David Campbell, Evergy president and chief executive officer. "We've exceeded our merger savings targets and are passing on those savings to customers as promised. These savings have enabled us to avoid base rate increases for five years. This year we're asking to adjust our rates to reflect and recover necessary investments we have made to enhance reliability and sustainability and better serve our customers."

The most significant driver of the rate increase request is focused infrastructure improvement aimed at enhancing reliability. While Evergy has a track record of solid performance, as the electric system ages, modern upgrades are needed to maintain and improve reliability. For example, upgrades in advanced automation technologies will reduce restoration times during outage events, while recent enhancements in data analytics programs allow Evergy to better model potential outage risk areas and target investments and improvements accordingly.

"Our customers depend on the constant flow of electricity we provide. In this part of the country, it's important that we continue to improve the grid, making it stronger and more resilient to limit power outages from severe weather, and be better protected against physical and cyber threats," Campbell said. "This rate request includes investments to improve reliability, such as replacing aging electrical infrastructure with new technologies that speed restoration by automatically detecting power outages and quickly rerouting power to customers."

Evergy's requested rate review also seeks to address customer interest in cleaner energy sources and more choice in electric rate options. Today about half of Evergy's energy comes from emission-free sources. As Evergy makes the transition to cleaner, more sustainable sources of energy, the company's focus remains on advancing that transition at the appropriate pace to ensure reliability and affordability. For example, this rate review includes recovery of the costs to retire one of the company's older Missouri coal-fired power plants. In addition, Evergy is also asking to give customers more choices in their electric rates. Building on its successful time of use program,



Evergy is seeking to introduce additional rate options, including expanding time of use options and a subscription pricing pilot, pre-payment options and other sustainable rate programs.

The COVID pandemic and resulting economic crisis created an urgent and unprecedented need for assistance. In 2020, Evergy donated \$1.8 million for COVID relief efforts at no cost to Evergy's customers. These donations were directed to 120 local agencies to help with emergency efforts, economic development programs, workforce training, and customer payment assistance. Evergy's COVID relief effort was in addition to its annual \$6.5 million in community support to hundreds of agencies throughout Evergy's Missouri and Kansas service areas. Evergy's community support donations are not included in customer rates.

With new COVID federal dollars available for rental and utility assistance, Evergy conducted approximately 500 outreach and social media events in 2020 and 2021 to connect and advise customers with bill assistance applications. Additionally, Evergy launched a one-stop location on its website with all assistance programs, links, helpful hints, and videos. Since 2020, these efforts have helped secure more than \$67 million in utility bill payment assistance for Evergy customers.

In addition to the COVID relief efforts, Evergy continued to safely operate its customer walk-in facility, Evergy Connect. With health and safety protocols in place, Evergy provided assistance to customers in need through face-to-face service and virtual consultations. Since 2019, Evergy Connect has provided customized, direct service to more than 27,000 customers, including billing and payment assistance, energy-efficiency and weatherization tools and other resources.

Evergy is also asking the MPSC to continue reflecting fuel and purchased power increases and decreases in its Fuel Adjustment Clause (FAC) on customer bills. The FAC allows Evergy to adjust customers' bills two times per year, up or down, based on actual costs of fuel and purchased power and is also reset following each rate review. As a result of substantially higher natural gas prices and power costs, Evergy is asking for an additional .45% increase for Evergy Missouri Metro customers and 4.46% for Evergy Missouri West customers in this rate review.

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About Evergy, Inc.

Evergy, Inc. (NYSE: EVRG) serves approximately 1.6 million customers in Kansas and Missouri. We were formed in 2018 when long-term local energy providers KCP&L and Westar Energy merged. About half our power comes from emission-free sources. We support our local communities where we live and work, and strive to meet the needs of customers through energy savings and innovative solutions

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Forward Looking Statements

Statements made in this document that are not based on historical facts are forward-looking, may involve risks and uncertainties, and are intended to be as of the date when made. Forward-looking statements include, but are not limited to, statements relating to Evergy's strategic plan, including, without limitation, those related to earnings per



share, dividend, operating and maintenance expense and capital investment goals; the outcome of legislative efforts and regulatory and legal proceedings; future energy demand; future power prices; plans with respect to existing and potential future generation resources; the availability and cost of generation resources and energy storage; target emissions reductions; and other matters relating to expected financial performance or affecting future operations. Forward-looking statements are often accompanied by forward-looking words such as “anticipates,” “believes,” “expects,” “estimates,” “forecasts,” “should,” “could,” “may,” “seeks,” “intends,” “proposed,” “projects,” “planned,” “target,” “outlook,” “remain confident,” “goal,” “will” or other words of similar meaning. Forward-looking statements involve risks, uncertainties and other factors that could cause actual results to differ materially from the forward-looking information.

In connection with the safe harbor provisions of the Private Securities Litigation Reform Act of 1995, Evergy, Inc., Evergy Kansas Central, Inc. and Evergy Metro, Inc. (collectively, the Evergy Companies) are providing a number of risks, uncertainties and other factors that could cause actual results to differ from the forward-looking information. These risks, uncertainties and other factors include, but are not limited to: economic and weather conditions and any impact on sales, prices and costs; changes in business strategy or operations; the impact of federal, state and local political, legislative, judicial and regulatory actions or developments, including deregulation, re-regulation, securitization and restructuring of the electric utility industry; decisions of regulators regarding, among other things, customer rates and the prudence of operational decisions such as capital expenditures and asset retirements; changes in applicable laws, regulations, rules, principles or practices, or the interpretations thereof, governing tax, accounting and environmental matters, including air and water quality and waste management and disposal; the impact of climate change, including increased frequency and severity of significant weather events and the extent to which counterparties are willing to do business with, finance the operations of or purchase energy from the Evergy Companies due to the fact that the Evergy Companies operate coal-fired generation; prices and availability of electricity in wholesale markets; market perception of the energy industry and the Evergy Companies; the impact of the Coronavirus (COVID-19) pandemic on, among other things, sales, results of operations, financial condition, liquidity and cash flows, and also on operational issues, such as the availability and ability of the Evergy Companies’ employees and suppliers to perform the functions that are necessary to operate the Evergy Companies; changes in the energy trading markets in which the Evergy Companies participate, including retroactive repricing of transactions by regional transmission organizations (RTO) and independent system operators; financial market conditions and performance, including changes in interest rates and credit spreads and in availability and cost of capital and the effects on derivatives and hedges, nuclear decommissioning trust and pension plan assets and costs; impairments of long-lived assets or goodwill; credit ratings; inflation rates; the transition to a replacement for the London Interbank Offered Rate (LIBOR) benchmark interest rate; effectiveness of risk management policies and procedures and the ability of counterparties to satisfy their contractual commitments; impact of physical and cybersecurity breaches, criminal activity, terrorist attacks and other disruptions to the Evergy Companies’ facilities or information technology infrastructure or the facilities and infrastructure of third-party service providers on which the Evergy Companies rely; ability to carry out marketing and sales plans; cost, availability, quality and timely provision of equipment, supplies, labor and fuel; ability to achieve generation goals and the occurrence and duration of planned and unplanned generation outages; delays and cost increases of generation, transmission, distribution or other projects; the Evergy Companies’ ability to manage their transmission and distribution development plans and transmission joint ventures; the inherent risks associated with the ownership and operation of a nuclear facility, including environmental, health, safety, regulatory and financial risks; workforce risks, including those related to the Evergy Companies’ ability to attract and retain qualified personnel, maintain satisfactory relationships with their labor unions and manage costs of, or changes in, retirement, health care and other benefits; disruption, costs and uncertainties caused by or related to the actions of individuals or entities, such as activist shareholders or special interest groups, that seek to influence Evergy’s strategic plan, financial results or operations; the possibility that strategic initiatives, including mergers, acquisitions and divestitures, and long-term financial plans, may not create the value that they are expected to achieve in a timely manner or at all; difficulties in maintaining relationships with customers, employees, regulators or suppliers; and other risks and uncertainties.

This list of factors is not all-inclusive because it is not possible to predict all factors. You should also carefully consider the information contained in our other filings with the Securities and Exchange Commission (SEC).



Additional risks and uncertainties are discussed in the Annual Report on Form 10-K for the year ended December 31, 2020 filed by the Evergy Companies with the SEC, and from time to time in current reports on Form 8-K and quarterly reports on Form 10-Q filed by the Evergy Companies with the SEC. Each forward-looking statement speaks only as of the date of the particular statement. The Evergy Companies undertake no obligation to publicly update or revise any forward-looking statement, whether as a result of new information, future events or otherwise, except as required by law.

**Gross Receipts Tax Information
Required by 20 CSR 4240-10.060**

**IS CONFIDENTIAL INFORMATION
NOT AVAILABLE TO THE PUBLIC.**

ORIGINALS FILED UNDER SEAL.

**TABLE OF REQUESTED VARIANCES FOR
ADVANCE EASY PAY (AEP) PILOT PROGRAM AND
RESIDENTIAL SUBSCRIPTION PRICING (RSP) PILOT PROGRAM**

20 CSR 4240-2.060(4) – Applications for Variances or Waivers

	Variance Requested ^{1,2}	Rationale ³	Justification ⁴
<p>20 CSR 4240-13.020</p> <p>Billing and Payment Standards</p>	<p>(1) A utility shall normally render a bill for each billing period to every residential customer in accordance with commission rules and its approved tariff.</p>	<p>AEP: No bills will be issued for a billing period because of daily access to actual usage and cost information.</p> <p>SP: Bills will be rendered according to the approved Residential Subscription Pricing Pilot tariff with appropriate waivers below.</p>	<p>AEP: Additional issuance of a periodic bill would be redundant and untimely, and would likely cause confusion.</p> <p>SP: The program is unique in the nature of the charge being agreed to by the customer for 12 months. The charge will change annually with notification to the customer prior. Therefore, there is no need for monthly actual information on a standard bill.</p>
	<p>(2) Each billing statement rendered by a utility shall be computed on the actual usage during the billing period except as follows:*...</p> <p>*Full text omitted to conserve space.</p>	<p>AEP: No billing statements will be issued for a billing period because of daily access to actual usage and cost information. For clarity, estimates for historical usage and forward expected usage will utilize the rules outlined in (2)(C) for estimation.</p> <p>SP: Customers will receive a monthly bill in accordance with their agreed upon monthly charge at the start of joining the program.</p>	<p>AEP: Additional issuance of a periodic bill would be redundant and untimely, and would likely cause confusion. Due to the nature of AEP, Company will need to estimate future usage.</p> <p>SP: As the program will be set up with an agreed upon monthly charge at the start, there is not a need to bill based on actual usage monthly. Customers will still have options available to find out their actual usage other than the actual bill.</p>

	Variance Requested ^{1,2}	Rationale ³	Justification ⁴
<p>20 CSR 4240-13.020</p> <p>Billing and Payment Standards (Con't)</p>	<p>(6) A utility may bill its customers on a cyclical basis if the individual customer receives each billing on or about the same day of each billing period. If a utility changes a meter reading route or schedule which results in a change of nine (9) days or more of a billing cycle, notice shall be given to the affected customer at least fifteen (15) days prior to the date the customer receives a bill based on the new cycle.</p>	<p>AEP: Customer’s billing periods will no longer be valid as they will receive access to their usage and cost information daily.</p>	<p>AEP: The nature of AEP is that there are no billing periods and therefore no changes to them except for when the customer returns to a standard rate.</p>
	<p>(7) A monthly-billed customer shall have at least twenty-one (21) days and a quarterly- billed customer shall have at least sixteen (16) days from the rendition of the bill to pay the utility charges, unless a customer has selected a preferred payment date in accordance with a utility’s preferred payment date plan. - *</p> <p>*Full text omitted to conserve space.</p>	<p>AEP: Customers will no longer have billing periods or specific due dates when participating in AEP. The customer will be paying in advance for usage and not tied to minimum periods of billing or minimum periods to pay.</p>	<p>AEP: The program offers customers the opportunity to have all their usage and cost information available daily and will not require billing periods or payment periods based on the nature of pre-payment.</p>
	<p>(9) Every bill for residential utility service shall clearly state— *</p> <p>*Full text omitted to conserve space.</p>	<p>AEP: Payment will be accomplished before usage occurs, and no bill will be rendered. Additionally, because bills are not rendered, and instead the service is paid in advance, advising the customer of an amount due and payment due dates are not feasible.</p> <p>SP: Customers will no longer have bills that are reliant on monthly usage reads as they have previously agreed to their monthly charge.</p>	<p>AEP: Payment due dates will be unnecessary. Information that remains relevant – account balance, taxes, and energy usage and charges – will be available daily via the participant's selected communication methods.</p> <p>SP: (9)(A) Based on a fixed monthly bill amount for a 12 month period, the customer will not need beginning and ending meter readings on their bill.</p>

	Variance Requested ^{1,2}	Rationale ³	Justification ⁴
20 CSR 4240-13.020 Billing and Payment Standards (Con't)	(12) During the billing period prior to any tariffed seasonal rate change, a utility shall notify each affected customer, on the bill or on a notice accompanying the bill, of the expected effect of the upcoming seasonal rate change on the customer's bill and the months during which the forthcoming seasonal rate will be in effect.	AEP: Payment will be accomplished before usage occurs, and no bill will be rendered. SP: Customers will receive a monthly bill in accordance with their agreed upon monthly rate at the start of joining the rate.	AEP: This information will be proactively provided through outbound communications, along with seasonal efficiency tips. Customers will have access to their usage and cost information on a daily basis. SP: The agreed upon fixed monthly charge accounts for seasonal rate changes. It will not be provided to the SP customer to minimize confusion of their fixed rate offer and guaranteed offer for no true-up.

¹ 20 CSR 4240-2.060(4)(A) – The regulation from which the Company requests a waiver and/or variance in order to implement the pilots.

² 20 CSR 4240-2.060(4)(C) – Every Missouri is the only public utility affected by this variance request.

³ 20 CSR 4240-2.060(4)(B) – The reason the waiver and/or variance is requested to accommodate the pilots.

⁴ 20 CSR 4240-2.060(4)(B) – The justification for the waiver/and or variance, e.g., why no one will be harmed, and may even benefit, from its waiver for the purposes of the pilots.

	Variance Requested ^{1,2}	Rationale ³	Justification ⁴
20 CSR 4240-13.025 Billing Adjustments	<p>(1)(C) In the event of an undercharge, the utility shall offer the customer the option to pay the adjusted bill over a period at least double the period covered by the adjusted bill...</p>	<p>AEP: Three options will be available for undercharged amounts: 1) the undercharges will move to unpaid balance, and 25% of the initial and all future payments will go towards the arrears until the amount is repaid; 2) The customer can pay the amount in full; or 3) participants can move back to traditional billing.</p>	<p>AEP: The customer will have the option to make payments on a different time schedule through the 25% arrearage payoff mechanism contemplated by AEP in order to remain in the program. Otherwise, the customer may return to traditional billing and therefore have access once again to the typical payment agreement and its applicable time period for repayment.</p>
20 CSR 4240-13.030 Deposits	<p>(2)(C) [The utility may require a deposit if the] customer has failed to pay an undisputed bill on or before the delinquent date for five (5) billing periods out of twelve (12) consecutive monthly billing periods, or two (2) quarters out of four (4) consecutive quarters. Prior to requiring a customer to post a deposit under this subsection, the utility shall send the customer a written notice explaining the utility's right to require a deposit or include such explanation with each written discontinuance notice. Notwithstanding the foregoing; a utility may not require a deposit from a customer if such customer [under certain specific circumstances.]*</p> <p>*Full text omitted to conserve space.</p> <p>(4)(C) Upon discontinuance or termination other than for a change of service address, [the deposit] shall be credited, with accrued interest, to the utility charges stated on the final bill and the balance, if any, shall be returned to the customer within twenty-one (21) days of the rendition of the final bill...</p>	<p>AEP: If for any reason the customer chooses to return or is removed from AEP and returned to traditional billing before completing six months of participation, the customer will be required to provide a deposit at that time or restore their prior deposit amount as if they had not participated in AEP.</p> <p>Notwithstanding the foregoing, if participation in AEP increased the customer's credit with the Company, that improved credit will be taken into consideration.</p> <p>AEP: AEP anticipates using the deposit – as well as accrued interest – as a credit towards the participant's AEP account so that any unused deposit can be applied to pre-paid service or towards arrearages.</p>	<p>AEP: If customers who are deemed a credit risk are unsuccessful on AEP, in that short timeframe, it is likely they still have the same issues with traditional billing that required the prior deposit. It is therefore reasonable to collect a deposit immediately on return to traditional payment status. The deposit could be paid in installments as necessary.</p> <p>The intent is to either restore the customer to the same deposit position they would be in were it not for participation in AEP or, if the customer's credit with the Company actually improved through participation, allow that improvement to be taken into consideration.</p> <p>AEP: Because the program applies any remaining deposit to AEP, it is reasonable to also use the interest that has accrued to that deposit for the same purpose.</p>
	Variance Requested ^{1,2}	Rationale ³	Justification ⁴

20 CSR 4240-
13.030
Deposits
(Con't)

(4)(D) Upon satisfactory payment of all undisputed utility charges during the last twelve (12) billing months, it shall be promptly refunded or credited, with accrued interest, against charges stated on subsequent bills. Payment of a charge is satisfactory if received prior to the date upon which the charge becomes delinquent provided it is not in dispute. Payment of a disputed bill shall be satisfactory if made within ten (10) days of resolution or withdrawal of the dispute. A utility may withhold refund of a deposit pending the resolution of a dispute with respect to charges secured by the deposit...

AEP: The customer's participation in AEP will not be counted against the customer in computing the time after which a deposit will be returned. For example, if a customer utilizes traditional payment methods for three months, participates in AEP for four months, then reverts back to traditional billing and reinstates the deposit, the Company will be allowed to return the deposit after nine additional months, assuming all other conditions of the section are met.

AEP: This method of time calculation is intended to restore the customer to the same deposit position they would be in were it not for participation in AEP.

	Variance Requested ^{1,2}	Rationale ³	Justification ⁴
<p>20 CSR 4240-13.045 Disputes</p>	<p>(1) A customer shall advise a utility that all or part of a charge is in dispute by written notice, in person, or by a telephone message directed to the utility during normal business hours. A dispute must be registered with the utility at least twenty-four (24) hours prior to the date of proposed discontinuance for a customer to avoid discontinuance of service as provided by these rules.</p>	<p>AEP: Because a customer dispute may be lodged shortly before the money in an AEP account runs out and the services are automatically terminated, it will not always be possible for the participants to accomplish 24-hour advance notice to the company.</p> <p>That said, customers will receive, through the two channels of communication to which they agreed for participation in the pilot, notices 5 days before, 2 days before, and the day before an anticipated zero balance, with an additional final notice occurring at 8 am the date of disconnection. Additionally, no disconnection will occur during non-business hours.</p>	<p>AEP: Because of access to usage information on a daily basis, and because of the consistent notifications the customer will receive in advance of an anticipated zero account balance, a customer should be able to more quickly raise and resolve any disputes. If they do not, however, it may not be possible – due to the automated nature of the process – for the Company to prevent disconnection of the service.</p> <p>If the customer disputes the charges after disconnection and the dispute is credible, service can be restored promptly. Importantly: 1) Low income customers will not be disconnected under this pilot, but instead will (as necessary) be shifted back to traditional payment; and 2) the meters of those participating in the AEP program with remote connection enabling devices will be capable of restoring service, under normal conditions, within an hour of any payment or resolution.</p>

	Variance Requested ^{1,2}	Rationale ³	Justification ⁴
<p>20 CSR 4240-13.045 Disputes (Cont'd)</p>	<p>(7) Failure of the customer to pay to the utility the amount not in dispute within four (4) working days from the date that the dispute is registered or by the delinquent date of the disputed bill, whichever is later, shall constitute a waiver of the customer's right to continuance of service and the utility may then proceed to discontinue service as provided in this rule.</p>	<p>AEP: There will not be a delinquent date of the disputed bill since the key factor is the date and time the participant reaches a zero balance.</p> <p>That said, customers will receive, through the two channels of communication to which they agreed for participation in the pilot, notices 5 days before, 2 days before, and the day before an anticipated zero balance, with an additional final notice occurring at 8 am the date of disconnection. Additionally, no disconnection will occur during non-business hours.</p> <p>Instead, if the Company receives sufficient notice of the dispute in advance of the disconnection, it will move the account to dispute status and delay the disconnection. Any arrearage accrued due to lack of disconnection will be paid off with 25% of each subsequent payment, pursuant to the process established in the AEP tariff.</p>	<p>AEP: Because of access to usage information on a daily basis, customers should be able to more quickly raise and resolve any disputes. Additionally, the participant will be informed of the need to notify the Company as soon as possible of any dispute, or automated disconnection may be unavoidable.</p> <p>The multiple notices that, under normal circumstances, the customer receives before a zero balance and before disconnection should allow sufficient time to dispute any portion of a charge.</p> <p>Importantly: 1) Low income customers will not be disconnected under this pilot, but instead will (as necessary) be shifted back to traditional payment; and 2) the meters of those participating in the AEP program with remote connection enabling devices will be capable of restoring service, under normal conditions, within an hour of any payment.</p>

	Variance Requested ^{1,2}	Rationale ³	Justification ⁴
20 CSR 4240-13.050 Discontinuance of Service	(2) (F) The failure to pay a bill correcting a previous underbilling, whenever the customer claims an inability to pay the corrected amount, unless a utility has offered the customer a payment arrangement equal to the period of underbilling.	AEP: Participants who have an inability to pay a previous underbilling will have two options: 1) The underbilling could be moved to unpaid balance and paid off with 25% of each subsequent account payment; or 2) the customer could move or be moved back to traditional billing and go onto a payment arrangement contemplated in the rule, which anticipates a time period equal to the period of the underbilling.	AEP: The customer will have the option to make payments on a different time schedule – the 25% arrearage payoff mechanism contemplated by AEP – in order to remain in the program. Otherwise, the customer may move, or be moved as may be appropriate, back to traditional billing and therefore have access once again to the typical payment agreement and its applicable time period for repayment.

	Variance Requested ^{1,2}	Rationale ³	Justification ⁴
<p>20 CSR 4240-13.050 Discontinuance of Service (Cont'd)</p>	<p>(4) The notice of discontinuance shall contain the following information: (A) The name and address of the customer and the address, if different, where service is rendered; (B) A statement of the reason for the proposed discontinuance of service and the cost for reconnection; (C) The date on or after which service will be discontinued unless appropriate action is taken; (D) How a customer may avoid the discontinuance; (E) The possibility of a payment agreement if the claim is for a charge not in dispute and the customer is unable to pay the charge in full at one (1) time; and (F) A telephone number the customer may call from the service location without incurring toll charges and the address of the utility prominently displayed where the customer may make an inquiry....</p>	<p>AEP: Program materials and resources clearly state that service is pre-paid, so that as long as the account balance stays above zero, no disconnection will occur. The program does not contemplate the possibility of a payment agreement.</p> <p>Additionally, in order to participate in the program, customers will execute an agreement specifically containing the information required for inclusion in a typical disconnect notice, such as contact information, how to avoid disconnection, etc.</p>	<p>AEP: Participants will still receive communications that contain the information required in (A) through (D) and (f), (or at a minimum, directions on where to find this information based on their communications preferences participants establish for their profile) via mobile app, text, email, telephone (IVR), and smartphone push notifications.</p> <p>Importantly: 1) Low income customers will not be disconnected under this pilot, but instead will (as necessary) be shifted back to traditional payment; and 2) the meters of those participating in the AEP program with remote connection enabling devices will be capable of restoring service, under normal conditions, within an hour of any payment.</p>

	Variance Requested ^{1,2}	Rationale ³	Justification ⁴
<p>20 CSR 4240-13.050 Discontinuance of Service (Cont'd)</p>	<p>(5) An electric, gas, or water utility shall not discontinue residential service pursuant to section (1) unless written notice by first class mail is sent to the customer at least ten (10) days prior to the date of the proposed discontinuance. Service of notice by mail is complete upon mailing. As an alternative, a utility may deliver a written notice in hand to the customer at least ninety-six (96) hours prior to discontinuance. ...</p>	<p>AEP: Rendering of a physical notice, particularly within the time periods established by the rule, is not practical given the nature of the AEP program.</p>	<p>AEP: The customer will have access to their daily account balance and usage data, making such notices unnecessary.</p> <p>Additionally, customers will receive, through the two channels of communication to which they agreed for participation in the pilot, notices 5 days before, 2 days before, and the day before an anticipated zero balance, with an additional final notice occurring at 8 am the date of disconnection.</p> <p>Importantly: 1) Low income customers will not be disconnected under this pilot, but instead will (as necessary) be shifted back to traditional payment; and 2) the meters of those participating in the AEP program with remote connection enabling devices will be capable of restoring service, under normal conditions, within an hour of any payment.</p>
	<p>(6) A utility shall maintain an accurate record of the date of mailing or delivery....</p>	<p>AEP: Rendering of a physical notice, particularly within the time periods established by the rule, is not practical given the nature of the program. Therefore, it will not be possible to retain records of this specific type of disconnection notice.</p>	<p>AEP: Instead, both the customer and the Company will have electronic access to the account's balance history, history of charges, and communication history, which includes anticipated zero balance and disconnection notices.</p>

	Variance Requested ^{1,2}	Rationale ³	Justification ⁴
20 CSR 4240-13.050 Discontinuance of Service (Cont'd)	<p>(7)(B) [Notice shall be provided] [a]t least ten (10) days prior to discontinuance of service for nonpayment of a bill or deposit at a multidwelling unit residential building where each unit is individually metered and for which a single customer is responsible for payment for service to all units in the building or at a residence in which the occupant using utility service is not the utility's customer, the utility shall give the occupant(s) written notice of the utility's intent to discontinue service; provided, however, that this notice shall not be required unless one (1) occupant has advised the utility or the utility is otherwise aware that s/he is not the customer...</p>	<p>AEP: It is unlikely that this situation will arise with a participant under this regulation, since it applies to one person being responsible for multiple metered units. Still, should such a customer participate in the program, the physical delivery of a disconnection notice, particularly within the time periods established by the rule, is not practical given the nature of the program.</p>	<p>AEP: Participating customers will have access to their daily account balance and usage data. The customer will also have notice through the program agreement that this process is accomplished based on account balance.</p> <p>Importantly: 1) Low income customers will not be disconnected under this pilot, but instead will (as necessary) be shifted back to traditional payment; and 2) the meters of those participating in the AEP program with remote connection enabling devices will be capable of restoring service, under normal conditions, within an hour of any payment.</p>
	<p>(8) At least twenty-four (24) hours preceding discontinuance, a utility shall make reasonable efforts to contact the customer to advise the customer of the proposed discontinuance and what steps must be taken to avoid it. Reasonable efforts shall include either a written notice following the notice pursuant to section (4), a doorhanger or at least two (2) telephone call attempts reasonably calculated to reach the customer.</p>	<p>AEP: Because it is difficult to predict exactly when an account will reach a zero balance and whether the customer will make a payment before it reaches a zero balance, this level of customer contact is not practical or cost effective.</p> <p>That said, customers will receive, through the two channels of communication to which they agreed for participation in the pilot, notices 5 days before, 2 days before, and the day before an anticipated zero balance, with an additional final notice occurring at 8 am the date of disconnection. Additionally, no disconnection will occur during non-business hours.</p>	<p>AEP: The customer will have access to their daily account balance and usage data, as well as automated disconnection communications. The customer will also have notice through the program agreement that this process is accomplished based on account balance.</p> <p>Importantly: 1) Low income customers will not be disconnected under this pilot, but instead will (as necessary) be shifted back to traditional payment; and 2) the meters of those participating in the AEP program with remote connection enabling devices will be capable of restoring service, under normal conditions, within an hour of any payment.</p>

	Variance Requested ^{1,2}	Rationale ³	Justification ⁴
<p>20 CSR 4240-13.050 Discontinuance of Service (Cont'd)</p>	<p>(9) Immediately preceding the discontinuance of service, the employee of the utility designated to perform this function, except where the safety of the employee is endangered, shall make a reasonable effort to contact and identify him/herself to the customer or a responsible person then upon the premises and shall announce the purpose of his/her presence. When service is discontinued, the employee shall leave a notice upon the premises in a manner conspicuous to the customer that service has been discontinued and the address and telephone number of the utility where the customer may arrange to have service restored.</p>	<p>AEP: Disconnections will be accomplished remotely and no Company employee will be deployed to physically disconnect service.</p> <p>That said, the customer will receive multiple notices before an anticipated zero account balance, including a final notice at 8 am the date of disconnection.</p>	<p>AEP: The customer will have access to their daily account balance and usage data, as well as automated disconnection alerts as noted above. The customer will have notice through the program agreement that this process is accomplished based on account balance.</p> <p>Importantly: 1) Low income customers will not be disconnected under this pilot, but instead will (as necessary) be shifted back to traditional payment; and 2) the meters of those participating in the AEP program with remote connection enabling devices will be capable of restoring service, under normal conditions, within an hour of any payment.</p>
<p>20 CSR 4240-13.055 Cold Weather Rule</p>	<p>(1)(E) Low income registered elderly or disabled customer means a customer registered under the provisions of subsection (1)(C) of this rule whose household income is less than one hundred fifty percent (150%) of the federal poverty guidelines...</p>	<p>AEP: The AEP tariff – and LIHEAP – define "low income" as at or below 200% of the federal poverty level. The Company requests that the same apply to AEP customers under the provisions of the CWR during the cold weather period.</p>	<p>AEP: This waiver will create more consistency between the AEP tariff and LIHEAP.</p>

	Variance Requested ^{1,2}	Rationale ³	Justification ⁴
<p>20 CSR 4240-13.055 Cold Weather Rule (Con't)</p>	<p>(3)(A) [Notice Requirements. From November 1 through March 31, prior to discontinuance of service due to nonpayment, the utility shall...] Notify the customer, at least ten (10) days prior to the date of the proposed discontinuance, by first-class mail, and in the case of a registered elderly or handicapped customer the additional party listed on the customer's registration form of the utility's intent to discontinue service. The contact with the registered individual shall include initially two (2) or more telephone call attempts with the mailing of the notice...</p>	<p>AEP: Physical delivery of a disconnection notice, particularly within the time periods established by the rule, is not practical given the nature of the AEP program.</p> <p>That said, customers will receive, through the two channels of communication to which they agreed for participation in the pilot, notices 5 days before, 2 days before, and the day before an anticipated zero balance, with an additional final notice occurring at 8 am the date of disconnection. Additionally, no disconnection will occur during non-business hours.</p>	<p>AEP: The customer will have access to their daily account balance and usage data, as well as automated disconnection communications. The customer will have notice through the program agreement that this process is accomplished based on account balance. In the case of required personal contact (D), the emergency contact (if provided) will be notified.</p> <p>Importantly: 1) Low income customers will not be disconnected under this pilot, but instead will (as necessary) be shifted back to traditional payment; and 2) the meters of those participating in the AEP program with remote connection enabling devices will be capable of restoring service, under normal conditions, within an hour of any payment.</p>

	Variance Requested ^{1,2}	Rationale ³	Justification ⁴
<p>20 CSR 4240-13.055 Cold Weather Rule (Con't)</p>	<p>(3)(B) [Notice Requirements. From November 1 through March 31, prior to discontinuance of service due to nonpayment, the utility shall...] Make further attempts to contact the customer within ninety-six (96) hours preceding discontinuance of service either by a second written notice as in subsection (3)(A), sent by first class mail; or a door hanger; or at least two (2) telephone call attempts to the customer...</p>	<p>AEP: Physical delivery of a disconnection notice, particularly within the time periods established by the rule, is not practical given the nature of the AEP program.</p> <p>That said, customers will receive, through the two channels of communication to which they agreed for participation in the pilot, notices 5 days before, 2 days before, and the day before an anticipated zero balance, with an additional final notice occurring at 8 am the date of disconnection. Additionally, no disconnection will occur during non-business hours.</p>	<p>AEP: The customer will have access to their daily account balance and usage data, as well as automated disconnection communications. The customer will also have adequate metering capabilities, which will include a meter capable of monitoring a customer's individual residential space. The customer will have notice through the program agreement that this process is accomplished based on account balance. In the case of required personal contact (D), the emergency contact (if provided) will be notified.</p> <p>Importantly: 1) Low income customers will not be disconnected under this pilot, but instead will (as necessary) be shifted back to traditional payment; and 2) the meters of those participating in the AEP program with remote connection enabling devices will be capable of restoring service, under normal conditions, within an hour of any payment.</p>

	Variance Requested ^{1,2}	Rationale ³	Justification ⁴
<p>20 CSR 4240-13.055 Cold Weather Rule (Con't)</p>	<p>(3)(C) [Notice Requirements. From November 1 through March 31, prior to discontinuance of service due to nonpayment, the utility shall...] Attempt to contact the customer at the time of the discontinuance of service in the manner specified by 4 CSR 240-13.050(8)...</p>	<p>AEP: Disconnections will be accomplished remotely, and no Company employee will be deployed to physically disconnect service therefore making contact with the customer is not practical with the AEP program.</p> <p>That said, customers will receive, through the two channels of communication to which they agreed for participation in the pilot, notices 5 days before, 2 days before, and the day before an anticipated zero balance, with an additional final notice occurring at 8 am the date of disconnection. Additionally, no disconnection will occur during non-business hours.</p>	<p>AEP: The customer will have access to their daily account balance and usage data, as well as automated disconnection communications. The customer will also have adequate metering capabilities, which will include a meter capable of monitoring a customer's individual residential space. The customer will have notice through the program agreement that this process is accomplished based on account balance. In the case of required personal contact (D), the emergency contact (if provided) will be notified.</p> <p>Importantly: 1) Low income customers will not be disconnected under this pilot, but instead will (as necessary) be shifted back to traditional payment; and 2) the meters of those participating in the AEP program with remote connection enabling devices will be capable of restoring service, under normal conditions, within an hour of any payment.</p>

	Variance Requested ^{1,2}	Rationale ³	Justification ⁴
<p>20 CSR 4240-13.055 Cold Weather Rule (Con't)</p>	<p>(3)(D) [Notice Requirements. From November 1 through March 31, prior to discontinuance of service due to nonpayment, the utility shall...] Make a personal contact on the premises with a registered elderly or handicapped customer or some member of the family above the age of fifteen (15) years, at the time of the discontinuance of service...</p>	<p>AEP: Disconnections will be accomplished remotely, and no Company employee will be deployed to physically disconnect service therefore making contact with the customer is not practical with the AEP program.</p> <p>That said, customers will receive, through the two channels of communication to which they agreed for participation in the pilot, notices 5 days before, 2 days before, and the day before an anticipated zero balance, with an additional final notice occurring at 8 am the date of disconnection. Additionally, no disconnection.</p>	<p>AEP: The customer will have access to their daily account balance and usage data, as well as automated disconnection communications. The customer will also have adequate metering capabilities, which will include a meter capable of monitoring a customer's individual residential space. The customer will have notice through the program agreement that this process is accomplished based on account balance. In the case of required personal contact (D), the emergency contact (if provided) will be notified.</p> <p>Importantly: 1) Low income customers will not be disconnected under this pilot, but instead will (as necessary) be shifted back to traditional payment; and 2) the meters of those participating in the AEP program with remote connection enabling devices will be capable of restoring service, under normal conditions, within an hour of any payment.</p>

	Variance Requested ^{1,2}	Rationale ³	Justification ⁴
<p>20 CSR 4240-13.055 Cold Weather Rule (Con't)</p>	<p>(3)(E) [Notice Requirements. From November 1 through March 31, prior to discontinuance of service due to nonpayment, the utility shall...] Ensure that all of the notices and contacts required in this section shall describe the terms for provisions of service under this rule, including the method of calculating the required payments, the availability of financial assistance from the Division of Family Services and social service or charitable organizations that have notified the utility that they provide that assistance and the identity of those organizations.</p>	<p>AEP: The program clearly states that service is pre-paid, so that as long as the account balance stays above zero, no disconnection will occur.</p> <p>That said, customers will receive, through the two channels of communication to which they agreed for participation in the pilot, notices 5 days before, 2 days before, and the day before an anticipated zero balance, with an additional final notice occurring at 8 am the date of disconnection. These notices will direct the customer to the location of additional information, including a toll- free contact number.</p>	<p>AEP: Participants will still receive alerts and other non-physically rendered communications that will either contain the required information, including the availability of financial assistance, or will direct customers to a location where this additional information is available (e.g., text and voice messages will reference links to websites and toll free numbers where the information will be provided).</p> <p>Importantly: 1) Low income customers will not be disconnected under this pilot, but instead will (as necessary) be shifted back to traditional payment; and 2) the meters of those participating in the AEP program with remote connection enabling devices will be capable of restoring service, under normal conditions, within an hour of any payment.</p>

	Variance Requested ^{1,2}	Rationale ³	Justification ⁴
<p>20 CSR 4240-13.055 Cold Weather Rule (Con't)</p>	<p>(6)(B) [Discontinuance of Service. From November 1 through March 31, a utility may not discontinue heat-related residential utility service due to nonpayment of a delinquent bill or account provided ...] The utility receives an initial payment and the customer enters into a payment agreement both of which are in compliance with section (10) of this rule...</p>	<p>AEP: CWR payment agreements that comply with 4 CSR 240-13.055(10) will not be available under the pilot, so instead, compliance with the AEP arrearage payoff (25% of payments go to any arrearage) will apply. Payment Agreements will only be available if the participant reverts back to traditional billing.</p>	<p>AEP: The customer will have access to their daily account balance and usage data, as well as automated disconnection communications. The customer will have notice through the AEP program agreement that this process is accomplished based on account balance.</p>
	<p>(9)(B) Reconnection Provisions. If a utility has discontinued heat-related utility service to a residential customer due to nonpayment of a delinquent account, the utility, from November 1 through March 31, shall reconnect service to that customer without requiring a deposit; provided— ... (B) The utility receives an initial payment and the customer enters into a payment agreement both of which are in compliance with section (10) of this rule;</p>	<p>AEP: CWR payment agreements that comply with 4 CSR 240-13.055(10) will not be available under the pilot, so instead, compliance with the AEP arrearage payoff (25% of payments go to any arrearage) will apply. Payment Agreements will only be available if the participant reverts back to traditional billing.</p>	<p>AEP: The customer will have access to their daily account balance and usage data, as well as automated disconnection communications. The customer will have notice through the AEP program agreement that this process is accomplished based on account balance.</p>
	<p>(10) Payment Agreements. The payment agreement for service under this rule shall comply with the following...* *Full text omitted to conserve space.</p>	<p>AEP: CWR payment agreements that comply with 4 CSR 240-13.055(10) will not be available under the pilot, so instead, compliance with the AEP arrearage payoff (25% of payments go to any arrearage) will apply. Payment Agreements will only be available if the participant reverts back to traditional billing.</p>	<p>AEP: The customer will have access to their daily account balance and usage data, as well as automated disconnection communications. The customer will have notice through the program agreement that this process is accomplished based on account balance.</p>

VERIFICATION

This undersigned states that this request is substantially consistent with the preferred resource plan specified in the most recent triennial compliance filing made by Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”), pursuant to 20 CSR 4240-22.080(18).



Darrin R. Ives
Vice President-Regulatory Affairs
Evergy Missouri Metro and Evergy Missouri
West