

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

In the Matter of a Collaborative Workshop for)
Customer Education and Outreach Regarding)
the Introduction of Default Time-of-Use Rates) File No. EW-2023-0199
by Evergy Metro, Inc. d/b/a Evergy Missouri)
Metro and Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West)

**EVERGY’S REPLY TO STAFF’S REQUEST
FOR ADDITIONAL INFORMATION**

COMES NOW, Evergy Metro, Inc. d/b/a as Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) (collectively, “Evergy” or the “Company”) submits its *Reply to Staff’s Request For Additional Information* filed on July 19, 2023 (“Reply”) to the Missouri Public Service Commission (the “Commission”), and states as follows:

I. INTRODUCTION

1. On July 19, 2023, the Staff filed its *Request For Additional Information*. (“Staff’s Request”). This pleading will reply to the Staff’s Request.

2. As Evergy has stated on numerous occasions in this informal working docket, Evergy values the ongoing discussion and feedback with Staff and OPC as we work to finalize and launch our customer education campaign to offer a default Time-of-Use (“TOU”) rate and other TOU options. Considering the insightful feedback provided during Workshop #1 and Workshop #2, Evergy is committed to using the Staff’s and OPC’s feedback to enhance our customer awareness and education initiatives. Evergy appreciates the dialogue, which enables us to adapt the campaign.

3. Evergy’s overriding goal in this process is to ensure that the Company’s roll-out of its TOU rates later this fall will be as successful, understood and embraced by its customers, and

as non-controversial as possible. More specifically, the goals of the TOU rate roll-out program include:

- a. Prepare customers for the upcoming change in rate structures, including the new mandatory rate, and how TOU rates work.
- b. Offer choice and inform customers of their rate options and the benefits depending on the customer's lifestyle.
- c. Provide customers with tools, resources, and reports that serve to help them understand TOU rates and options, empower them to choose their rate, and provide guidance to modify their behaviors so that they can mitigate usage and bill impact to increase their success on a TOU rate.
- d. Help all customers (and with increased emphasis on special customer groups) be successful before, during and after the mandatory TOU rate transition and/or enrollment on their selected TOU rate option.¹

4. Given the intense interest of the customers, press, and other stakeholders in the implementation of TOU rates, Evergy also recognizes its obligation to provide as much information as reasonably possible to the Commission and interested stakeholders as the roll-out process is developed on a collaborative basis among the Company, Staff, OPC, and other interested entities. Notwithstanding this obligation, Evergy strongly believes it would be a mistake to treat this informal, collaborative workshop process as a contested case², prudence review, or similar adversarial proceeding in which extensive discovery is allowed. Evergy also strongly believes that

¹ See Evergy's Time of Use Workshop 2 Presentation, Slide 11 (May 23, 2023).

² The Commission previously recognized that this workshop docket is not a contested case, but it will "serve as a repository for documents and comments." See *Order Opening Working Case*, pp. 1-2, File No. EW-2023-0199 (December 21, 2022).

it must not allow this informal collaborative process to impede the development of a successful roll-out process.

II. EVERGY'S SUGGESTED PLAN FOR PROVIDING ADDITIONAL INFORMATION

5. In order to provide the Commission and interested participants with ongoing information as the roll-out process is finalized, Evergy intends to make a presentation to the Commissioners at the August 10th Agenda Meeting to summarize the progress to date, the upcoming challenges, and provide the opportunity for Commissioners to ask Evergy spokesmen questions regarding the status of the TOU rate program.

6. In addition, Evergy proposes to file a monthly status report that reports operational, education and engagement metrics through the implementation period to the end of the year. Additionally, Evergy will include education and engagement materials that have been completed during the month. Evergy will file this monthly status report post the August 10th Agenda Meeting. This report is in addition to the quarterly reports that Evergy submits detailing the types of education and outreach expenses deferred, as ordered by the Commission.

III. EVERGY RESPONSE TO STAFF'S REQUEST FOR INFORMATION

7. The Company expects to be able to respond to virtually all of the specific information requests by August 1, 2023, as requested by Staff.

8. It should be noted, however, that some of the requested items are "a work in progress" and are not fully developed or finalized.

WHEREFORE, Evergy respectfully requests that the Commission consider its Reply to the Staff's Request For Additional Information filed on July 19, 2023.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorneys for Evergy Missouri Metro and
Evergy Missouri West**

CERTIFICATE OF SERVICE

I hereby certify that a true and copy of the foregoing was emailed on this 28th day of July 2023 to counsel for all parties.

/s/ Roger W. Steiner

Roger W. Steiner