

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

**STAFF RESPONSE TO MARCH 28, 2023 PRESENTATION AND  
REQUESTS FOR ADDITIONAL INFORMATION**

**COMES NOW** the Staff of the Missouri Public Service Commission, and for its *Staff Response to March 28, 2023 Presentation and Requests for Additional Information*, states as follows:

1. *Given the Commission’s interest in this matter, Staff is filing its feedback in this working docket, and requests that Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (collectively, “Evergy” or the “Company”) provide its responses to the information requests included here-in in this working docket to the extent practicable.*

*Staff Concerns and Feedback*

2. Staff is concerned about customers receiving information regarding the default rate and education regarding time of use generally at most only 90 days prior to the change in rate plans as Evergy has indicated in this presentation. Staff believes this information should include the default rate and the full-range of the optional rates that a customer can choose. However, information on the default rate should take priority if there other timing limitations due to the number of optional rates in effect. The primary focus should be on educating customers of the bill impacts expected under default ToU

rate, and education on how rate applies to customers' usage. Care must be taken that marketing of optional rates does not distract from education on the default rate.

3. In addition to Evergy's existing ToU education programs, Staff suggests including a line on customer bills as soon as it is possible to do so stating essentially "Your current rate plan will no longer be available beginning in late 2023. Please keep an eye out for further information concerning this important change. Information concerning your expected bill impact based on your current usage pattern will be available online at WEBSITE, beginning in MONTH/DATE. Starting with your MONTH bill, information concerning your expected bill impacts and usage patterns will be included on your bill." Staff suggests then including a line on customer bills as soon as it is possible to do so stating essentially "Your current bill this month was \$xx.xx. In late 2023 you will be transitioned to the 2 Part ToU Rate Plan, unless you select a different optional Time Based rate plan. If you had been on the 2 Part ToU Rate Plan this month, your bill would have been \$xx.xx."

4. This is not intended to preclude additional appropriate education such as mass media, social media, and through community partners.

5. Staff suggests Evergy consider whether different and/or additional information should be provided to customers currently served on discounted rates, such as space heating, and net metering customers.

6. Slide 22 mentions "focus on price discount," Staff is concerned that this is not the most reasonable aspect to emphasize under the circumstances and time constraints of this case.

7. The utility should be recording expenditures in a manner to tie any costs and expenses for which rate recovery will be sought (including deferred expenses) to the purpose for which the costs were incurred. Care should be taken to preserve any delineations between educating customers regarding the default rate and marketing of optional rates

*Supporting and Additional Information Requested*

8. Please provide information on the timing and expected cost of each suggested content item described above in numbers 2-4.

9. What marketing names are being contemplated for the rate plans?

10. Please provide the timing and content of Company's proposed 90/60/30 day marketing materials.

11. Please provide workpapers underlying slides presented on pages 14 – 17 (bill impacts).

12. Please provide notes and any other materials associated with interviews described on slide 20 (Summer 2022 interviews re: ToU deployment at other utilities).

13. Provide workpapers for the budget estimates at page 24.

14. Clearly identify what changes to the bill comparison tool Evergy believes are necessary, and provide estimated cost of each change and estimated timeline of each change.

15. Clearly identify the anticipated changes in call center staffing/training Evergy believes are necessary and provide estimated cost of each change, and estimated timeline of each change.

16. Clearly identify the anticipated changes in billing systems that Evergy believes are necessary and provide the estimated cost of each change, and estimated timeline of each change.

17. Please describe in as much detail as possible Evergy's preliminary plans for deployment/transition, including any targeted initial deployment.

18. Please provide the RFP, Responses, Evergy scoresheets or metrics, and any underlying data or information for the "Customer Marketing and Education" referenced on slide 29.

19. Please provide explanations and justification for all costs incurred to procure outside consulting for purposes of customer education and marketing associated with ToU rate structure implementation since the Commission provided at Agenda the direction it intended to take in its Order concerning default ToU rates.

20. Please provide a detailed explanation of the limitations of Evergy's current employees in implementing customer marketing and education associated with implementation of the ordered rate structures.

**WHEREFORE**, Staff prays the Commission accept this *Staff Response to March 28, 2023 Presentation and Requests for Additional Information*, and grant such other and further relief as it deems just under the circumstances.

Respectfully submitted,

**/s/ Nicole Mers**

Nicole Mers #66766

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**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 14th day of April, 2023.

**/s/ Nicole Mers**