

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ET-2021-0110
Eversource Missouri West, Inc.

FROM: Robin Kliethermes, Regulatory Compliance Manager

/s/ Natelle Dietrich 10/23/2020
Director/ Commission Staff / Date

/s/ Nicole Mers 10/23/2020
Staff Counsel Division / Date

SUBJECT: Staff Recommendation to Approve Eversource Missouri West (“Eversource West”) Proposed Tariff Revisions

DATE: October 23, 2020

Eversource West Application

On October 8, 2020, Eversource West filed an Application for approval of tariff revisions, request for waiver of 60 day notice requirement and motion for expedited treatment with the Commission. Exemplar tariffs were attached to the Company’s Application, but compliance tariffs are expected to be filed to coincide with January 18, 2021.

On October 9, 2020, the Commission issued its Order Directing Notice and Setting Expedited Deadlines for Intervention and Staff Recommendation.

Staff Review

Staff has reviewed the tariff revisions. In discussions with the Company and Office of the Public Counsel (OPC), Staff understands that the compliance tariffs filed in this docket will match the exemplar tariffs attached to the Company’s Application with the exception of the bold language, provided below.

ET-2021-0109, sheet 1.23, section 6.06(A) and ET-2021-0110, sheet R-37, section 6.04(B)(1.1)(a) the first sentence will read:

*For customers with Advanced Metering Infrastructure (AMI) meters, when a current meter read is unavailable, the Meter Data Management (MDM) system will average consumption from the **last read plus the three-prior days** to estimate the daily meter read.*

ET-2021-0109, sheet 1.09A, section 2.07(D)(1) the last sentence will read:

*For non-residential customers, a security deposit shall not exceed two (2) times the highest bill for utility charges actually incurred by the customer, **or in the case of a new customer estimated to be incurred**, during the most proximate twelve (12) month period at the service location.*

Further, the Company seeks a waiver from 20 CSR 4240-4.017(1) and asserts good cause exists because a 60 day notice period will not permit the Company to meet its November testing deadline for changes to the Company's January 18, 2021 implementation of the Customer Forward Program. However, the Company shared the tariff changes with Staff in advance of filing its Application. Staff is not aware of the cause of delay in simply filing a notice of intent per the Commission Rules. However, accuracy of customer bills and calculation of deposits are important to not only the success of the Customer Forward Program, but also necessary to Evergy West's obligation to provide reasonable service to its customers; therefore, Staff does not oppose the requested waiver.

Lastly, the Company's Application seeks Commission authority to allow non-residential customers to pay with an approved credit or debit card while incurring a third-party vendor transaction fee. The Company's Application further states that the fee is currently set at 2.7% and is charged by and paid to the third party vendor processing the commercial card payment. Staff is not aware of a Commission Rule or tariff provision that prohibits the Company from allowing non-residential customers the ability to pay with an approved credit or debit card through a third-party vendor; therefore neither the requested tariff revision nor an explicit grant of Commission authority is necessary. However, because the requested tariff revision may assist customers in differentiating the treatment of residential versus non-residential customers, Staff is not opposed to promulgation of the requested change.

Staff Recommendation

Staff recommends that the Commission approve the Company's Application with the exceptions noted above.

Staff has verified that Evergy West is not delinquent on any assessment and has filed its Annual Report. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Evergy)
Missouri West, Inc. d/b/a Evergy Missouri)
West for Approval of Tariff Revisions) **Case No. ET-2021-0110**

AFFIDAVIT OF ROBIN KLIETHERMES

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW Robin Kliethermes, and on their oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation in Memorandum form*; and that the same is true and correct according to her best knowledge and belief, under penalty of perjury.

Further the Affiant sayeth not.

/s/ Robin Kliethermes
Robin Kliethermes