

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

In the Matter of the Joint Application)
of Evergy Metro, Inc. d/b/a Evergy Missouri)
Metro and Evergy Missouri West, Inc. d/b/a) File No. ET-2024-_____
Evergy Missouri West for Approval of Tariff)
Revisions to TOU Program)

**APPLICATION FOR APPROVAL OF TARIFF REVISIONS TO TIME-OF-USE
PROGRAM, REQUEST FOR WAIVER OF 60 DAY NOTICE REQUIREMENT, AND
MOTION FOR EXPEDITED TREATMENT**

COMES NOW, 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”)(collectively, the “Company”) file this *Application for Approval of Tariff Revisions to TOU Program* (“Application”), *Request for Waiver of 60 Day Notice Requirement and Motion for Expedited Treatment, and Motion to Allow Tariffs To Go Into Effect on Less than 30 Days’ Notice* (“Motion”). In support of its Application, the Company states:

1. Evergy Missouri Metro is a Missouri corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. The Company is primarily engaged in the business of generating, transmitting, distributing, and selling electric energy in portions of eastern Kansas and western Missouri. The Company is an electric corporation and public utility as defined in Section 386.020 Mo. Rev. Stat. (2000), as amended. A Certificate of Good Standing was filed with the Commission in Case No. EN-2020-0063 and is incorporated herein by reference in accordance with 20 CSR 4240-2.060(1)(G).

2. Evergy Missouri West is a Delaware corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. The Company is primarily engaged in the business of generating, transmitting, distributing, and selling electric energy in portions of western Missouri. The Company is an electric corporation and public utility as defined in Section

386.020 Mo. Rev. Stat. (2000), as amended. A Certificate of Authority for a Foreign Corporation to do business in the State of Missouri, evidencing Evergy Missouri West's authority under the 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:

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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-2023-0433, *Bonacci v. Evergy Missouri Metro and Evergy Missouri West*;
- (ii) Docket No. EC-2023-0334, *Kojeski v. Evergy Missouri Metro and Evergy Missouri West*.

- (iii) Docket No. EC-2024-0015, *Timothy Allegri v. Evergy Missouri Metro and Evergy Missouri West*.

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

SUMMARY OF REQUESTED CHANGES TO TOU IMPLEMENTATION PROGRAM

6. The Application requests the approval of revised tariffs for Evergy Missouri Metro and Evergy Missouri West which will authorize the following changes to the Company’s approved Time-of-Use (“TOU”) Implementation Program tariffs. Evergy seeks to:

- (i) Modify the default TOU rate from the high differential 2-period TOU rate [i.e. Standard Peak Saver] to the low differential Peak Adjustment TOU rate [i.e. Peak Reward Saver];

- (ii) Modify the tariffs to allow residential customers to opt-in to the traditional residential rate (i.e. “Anytime Plan”) which has historically been in effect and is proposed to be offered as an option beginning May 1, 2024 rather than being terminated as scheduled under the approved TOU Implementation Program;

- (iii) Restrict rate switching to mitigate adverse revenue impacts by selective switching between the offered tariffs to artificially lower a customer's annual bill below reasonable cost of service through tariff selection only;

- (iv) Revise the estimates of education, outreach and implementation costs consistent with the revisions requested to be approved in the Application.

While this Application is pending before the Commission, Evergy intends to pause its current communication efforts with customers designed to encourage customers to choose a new rate option. Depending upon the Commission’s decision in this matter, Evergy will immediately

resume communicating the available rate options in Missouri following the issuance of the Commission’s decision on this matter.

**BACKGROUND FOR REQUESTED CHANGES
TO THE TOU IMPLEMENTATION TARIFFS AND PLAN**

7. In the last general rate case for Evergy Missouri Metro and Evergy Missouri West (File Nos. ER-2022-0129 and ER-2022-0130, respectively), the Commission approved tariffs authorizing the Company to implement five sets of Time-of-Use (“TOU”) rates.¹ In its Order, the Commission ordered that Evergy’s proposed opt-in high differential 2-period TOU rate (“Standard Peak Saver”) be established as the default residential customer rate, with Staff’s proposed low differential Peak Adjustment TOU rate (“Peak Reward Saver”) be established as an opt-in TOU rate. In addition, the Commission approved a 3-period TOU rate (“Nights and Weekend Saver”), a High Differential EV TOU rate (“Nights and Weekend Max Saver”) and a Separately Metered Electric Vehicle TOU rate (“EV Only Plan”) as optional rates that may be chosen by the customers. The Order stated: “Residential customers who are not currently on a TOU rate plan, will be assigned to the 2-period TOU rate automatically, and may opt-in to either Staff’s low differential, Evergy’s 3-period, High Differential EV rate or Separately Metered EV rate.”² However, there was no option approved by the Commission for customers to opt-in to the traditional rate structure (non-time varying) for residential service, if the traditional rate structure was the customer’s preference. Instead, the Commission Order stated: “The Commission is not approving any traditional ratemaking structure for residential customers to be used after December 31, 2023, when the transition to TOU default rates is completed, with the exception of those residential customers without AMI meters.”³

¹ See *Amended Report and Order*, pp. 70-74, File Nos. ER-2022-0129 and ER-2022-0130 (issued December 8, 2020).

² Id. at 72.

³ Id. at 73.

8. On June 14, 2023, the Commission issued its Report and Order in Ameren Missouri’s most recent rate case, File No. ER-2022-0337 (“*June 14 Ameren Order*”). In its *June 14 Ameren Order*, the Commission approved several TOU rates for residential customers, including a default TOU rate. Unlike the previous Evergy Order, the Commission’s *June 14 Ameren Order* continued to allow for customers to choose to opt into the traditional rate structure (referred to as the “Anytime Rate”) if they did not want to be under a TOU rate structure. The Commission stated:

Staff has asked to eliminate the Anytime plan as an option for customers with an AMI meter. The Commission does not find it appropriate to eliminate the Anytime plan, as it would eliminate a choice available to customers. The Commission encourages customers to take control of their electric utility bills by adopting one of Ameren Missouri’s TOU plans. However, certain customers may want to maintain the same rate for all hours of the day, without having to determine whether they are using electricity during a peak usage time. Therefore, the Commission will maintain the Anytime rate as an option for those customers.⁴

9. As Evergy has been educating its customers about the Commission’s decision to mandate a high differential 2-period TOU rate as the default rate, it has become apparent that there is a significant subset of Evergy customers that prefer a TOU rate structure that is substantially similar to the existing traditional rate structure. The low differential Peak Adjustment TOU rate proposed by the Commission Staff in the last general rate case is the closest approved TOU rate to the traditional residential rate structure; however, it still includes a time variant element with an on-peak and super off-peak charge and credit, respectively.

10. The Company also recently completed a customer survey of Missouri residential customers to gauge the customer reactions and perceptions regarding mandatory TOU rates in Missouri. See **Exhibit A** (Time-Based Rate Campaign Tracker—Missouri residential customer survey (August 2023)). The following summarizes key findings of the customer survey:

- **Very high customer awareness of the mandated move to TOU** – Evergy has very high awareness numbers and recall of the marketing

⁴ See *Report and Order*, p. 37, Re Ameren Missouri, File No. ER-2022-0337.

communications, indicating the marketing is breaking through and effectively achieving the goal of educating customers about TOU.

- 76% of MO residential customers have heard about Evergy's time-based rate plans (slide 12)
- 69% of customers recall seeing communications from Evergy regarding TOU (slide 17)
- **Satisfaction with Evergy is declining since TOU marketing began** – The tracker shows customers who are somewhat to extremely satisfied with Evergy has declined 7% June to August with the sharpest decline is in customers who are very or extremely satisfied (17% decline). (slide 4)
- **Concern about switching to time-based plans is high** – The appeal of time-based plans has declined over the past two months, while the number of customers who are very concerned or extremely concerned about switching has increased. The dominant reason customers are concerned is fear their bill will go up.
 - 19.6% of customers in August find switching to time-based rates very or extremely appealing (slide 24)
 - 84% of customers in August say they are somewhat concerned or extremely concerned about switching to time-based rates (slide 26)
 - 73% of customers are concerned their bill will go up with time-based rates (slide 33)

11. The Company has also observed a substantial number of comments on its social media from customers who have reacted adversely to initial press reports explaining the mandatory TOU program. Customer dissatisfaction expressed on social media is largely about the mandatory aspect of the move to TOU and accusations of price gouging as opposed to customer confusion about the rates or TOU structure. The tone of the comments is mostly negative and speaks to customer frustration with being forced to move rates because Evergy is trying to spike customer bills to increase profits. A sampling of typical customer comments on social media is attached as **Exhibit B**.

12. On August 10, 2023, Evergy representatives (Chuck Caisley and Katie McDonald) made a presentation at the Commissioners' Agenda Meeting giving the Commission a summary of

the progress of the TOU Implementation Program and addressing comments and concerns of the Commissioners. The Company's presentation was filed in File No. EW-2023-0199.⁵ During the Agenda meeting, Evergy suggested that the Company was willing to make additional periodic reports to the Commission regarding the progress of the TOU Implementation Program.

13. On August 30, 2023, the Commission issued its *Order Directing Time-of-Use Customer Choice Transitioning Reporting* in File No. EW-2023-0199 which directed the Company to file monthly updates on data related to the progress of the TOU Implementation Plan and scheduled future On-the-Record presentations and a stakeholder workshop to discuss the progress of the TOU Implementation Plan.⁶

14. During the Commissioners' discussion of the *Order Directing Time-of-Use Customer Choice Transitioning Reporting*, various commissioners expressed concerns with the direction of the TOU Implementation Plan and the misinformation circulating in the media and the public related to the TOU Implementation Plan. Commissioner Hahn, in particular, discussed two options for making changes to the TOU Implementation Plan, including the filing of a new rate case to modify the rate plan, or alternatively, the more expeditious method of filing an application to make tariff changes to modify the TOU Implementation Plan tariffs. Among the possible changes discussed by Commissioners Hahn, Kolkmeier and Holsman was the possibility of changing the default TOU rate option from the 2-period high differential TOU rate to Staff's low differential TOU rate.⁷ Commissioner Hahn also expressed confusion over the brand names of some of the TOU rate options and discussed the possibility of maintaining the existing standard (traditional) residential rate structures as an option for consumers to choose.⁸

⁵ See Notice of Agenda Presentation, File No. EW-2023-0199 (filed August 11, 2023).

⁶ Order Directing Time-of-Use Customer Choice Transitioning Reporting, File No. EW-2023-0199 (issued August 29, 2023).

⁷ <http://psc.mo.gov/Videos/VideoDetail.aspx?Id=6636>

⁸ See Agenda Meeting Discussion at <http://psc.mo.gov/Videos/VideoDetail.aspx?Id=6636> at 18:00 minute mark (August 30, 2023).

15. During the June 1, 2023 Agenda discussion related to the Ameren Missouri TOU rate plans, Commissioner Coleman also expressed support for retaining Ameren Missouri’s standard (traditional) residential rate option (i.e. Anytime Rate), and Commissioner Kolkmeier expressed concerns and hesitations about forcing customers into a TOU rate.⁹

16. Recognizing the Commission’s interest in revisiting rate options related to Evergy’s TOU Implementation Plan and the public’s confusion and discontent with the roll-out of the current TOU Implementation Plan, the Company respectfully requests that the Commission consider the revised tariff changes proposed in this Application that would modify the TOU Implementation Plan on an expedited basis, if approved by the Commission. More specifically, the Company seeks approval by September 29, 2023 of the following tariffs:

Evergy Missouri Metro

- PSC MO. No. 7 Third Revised Sheet No. 5
- PSC MO. No. 7 Twelfth Revised Sheet No. 5A
- PSC MO. No. 7 Twelfth Revised Sheet No. 5B
- PSC MO. No. 7 First Revised Sheet No. 5D
- PSC MO. No. 7 Eighth Revised Sheet No. 6
- PSC MO. No. 7 Third Revised Sheet No. 7
- PSC MO. No. 7 First Revised Sheet No. 7B
- PSC MO. No. 7 First Revised Sheet No. 7F
- PSC MO. No. 7 Twelfth Revised Sheet No. 8

Evergy Missouri West

- PSC MO. No. 1 Second Revised Sheet No. 146
- PSC MO. No. 1 Third Revised Sheet No. 146.1
- PSC MO. No. 1 Third Revised Sheet No. 146.3
- PSC MO. No. 1 Second Revised Sheet No. 146.5
- PSC MO. No. 1 First Revised Sheet No. 146.7
- PSC MO. No. 1 First Revised Sheet No. 146.9
- PSC MO. No. 1 First Revised Sheet No. 165

⁹ See Agenda Meeting Discussion at <http://psc.mo.gov/Videos/VideoDetail.aspx?Id=6601> 1.35 and 1.38 minute mark (June 1, 2023).

**REQUEST FOR AUTHORITY TO DEFAULT RESIDENTIAL CUSTOMERS
TO THE STAFF LOW DIFFERENTIAL TOU RATE STRUCTURE**

17. The Application seeks approval of the revised tariffs filed with this Application that will establish the low differential Peak Adjustment TOU rate, initially proposed by Staff and Office of Public Counsel (“OPC”) in the Company’s last rate case, as the default rate. Evergy customers will continue to have the option to opt-in to one of the other TOU rate structures if they choose to do so. Customers will also be able to fully utilize Evergy’s rate comparison tool which is available on Evergy’s website to assist customers in making an informed decision about which option to choose. The rate comparison tool will also be available to modify their rate choice in the future. This rate comparison tool will continue to educate customers on the various rate options to determine which rate plans work best for their individual situation.

18. The establishment of the low differential Peak Adjustment TOU rate as the default rate is in the public interest since it is the TOU rate that has the least impact on customers who do not or cannot change their usage patterns. This proposal is consistent with the recommendations of Staff and OPC in the Company’s last rate case.¹⁰ For customers who are not fully engaged in choosing a new TOU plan, the low differential Peak Adjustment TOU option will have the least impact on their bills of the other approved TOU plans and would be expected to engender the least controversy since the rate impact will be less if summer peak usage patterns are not modified.

**REQUEST FOR AUTHORITY TO ALLOW RESIDENTIAL CUSTOMERS TO OPT-IN
TO TRADITIONAL RESIDENTIAL RATE STRUCTURES**

19. Evergy Missouri Metro and Evergy Missouri West tariffs sheets do not currently authorize customers to opt-in to the traditional rate structure, or allow the Company to retain the traditional rate structure beyond the implementation date for the TOU rates. The Application requests authority to modify the tariffs to allow residential customers to choose the existing

¹⁰ See Report and Order, pp. 70-71, and OPC Initial Brief, pp. 75-76, File Nos. ER-2022-0129 and ER-2022-0130.

traditional residential rate structure (“Anytime Plan”) on a going forward basis. The Application also seeks authority for the Company to retain its traditional residential rate structure for residential customers as an option for its residential all-electric service and separately metered heating service. Due to the need to re-program Evergy’s billing system to accommodate this option, Evergy proposes that the Anytime Plan will become available as a rate option on May 1, 2024, following the implementation of new default rates starting in October 2023. The modest delay in implementing the Anytime Plan would have the added advantage of allowing all residential customers to experience one of the TOU options before choosing to return to the traditional residential rate structure.

20. This option will be particularly beneficial to Evergy’s residential all-electric customers who heat their homes with electricity, as well as customers on fixed incomes and others who are less able to modify their usage patterns. Unless the traditional residential rate structure is maintained as an option for the residential all-electric and separately metered heating customers and for vulnerable customers who are unable to modify their usage patterns, these customers are likely to have a significant increase in their bills.¹¹ This option is also expected to be attractive to customers that are hesitant or opposed to the adoption of a TOU rate structure and prefer to opt back in to their existing traditional residential rate.

REQUEST TO RESTRICT RATE SWITCHING

21. Evergy also seeks authority to amend its residential tariffs to where customers may choose another rate option at any time, but will be required to wait 12 months before they are able to re-enroll in the rate they exited while retaining the ability to switch to any other open optional rate. This restriction would apply to all residential rates except for the proposed default rate (the

¹¹ The Anytime Plan will be somewhat higher than the existing residential all-electric and separately metered heating rate available under currently approved tariffs as it will not reflect any all-electric discount.

low differential Peak Reward Saver Plan). Currently there are no restrictions in place for the number of times a customer can change rate plans. It is important to note that this design was proposed associated with voluntary opt-in TOU plans proposed by Evergy in its last rate reviews. However, the Commission's Order to mandate TOU as default rates along with eliminating the traditional residential rate necessitates a change to this approach to mitigate potential adverse revenue impacts.

22. Evergy is concerned that customers may move from one of the three "high differential" TOU rates (Standard Peak Saver, Nights and Weekends Saver, Nights and Weekends Max Saver) and into one of the two "low differential" rates (the low differential Peak Adjustment TOU or the proposed traditional residential rate "Anytime Plan") to take advantage of seasonal differences in the rates. There is a high summer rate and low winter rate component on each of the three high differential rates and the Company cannot recover its costs to serve if customers take seasonal advantage of this difference. For this reason, other than the proposed default rate (the low differential Peak Adjustment TOU rate), the Company seeks Commission approval of tariff changes which allows a customer to choose another rate option at any time, but will be required to wait 12 months before they are able to re-enroll in the rate they exited. This requirement will restrict rate switching to mitigate adverse revenue impacts by selective switching between the offered tariffs to artificially lower the annual bill below reasonable cost of service through tariff selection only.

REVISED EDUCATION, OUTREACH AND IMPLEMENTATION COSTS

23. As mentioned above, there is a need to align education and outreach efforts to customers regarding the revised TOU Implementation Program after it is approved by the Commission. The following system changes will be needed to accomplish the changes in the TOU program, as described herein:

- Configure the billing system to accommodate the low differential Peak Adjustment TOU rate as the default rate for residential customers where appropriate (premise details may dictate other default options such as net metering, non-AMI, parallel

generation, or low income solar subscription customers). The changes will need to be tested through all channels including Intelligent Virtual Agent (“IVA”) and Website;

- Update and test the tool that has been developed to transition customers by billing cycle and which will preserve their account information such as payment arrangements, budget billing, and other impacting characteristics. The tool was built to accommodate the 2-period TOU as the default and will need to be updated and tested accordingly;
- Build and test the functionality to allow customers to select the traditional residential rate (“Anytime Plan”) as a "change my rate" option through the self-service channel via the website as well as via a Customer Service Representative. This will become available May 1, 2024 pending Commission approval;
- Build and reconfigure reports to manage the transition process to ensure customers are on correct rates based on premise details.

24. Evergy is in the process of estimating the additional costs necessary to implement the changes requested in the Application. Evergy intends to file a late-filed Exhibit which will estimate and summarize the incremental costs by no later than September 20, 2023. Evergy requests that in its order on this Application, the Commission approve the inclusion of the additional costs associated with education, outreach, and implementation of the revised TOU Implementation Plan to be tracked and deferred to the regulatory asset ordered for TOU Implementation in File Nos. ER-2022-0129 and ER-2022-0130 for consideration of possible recovery in a future rate case, as previously approved by the Commission.¹² The Company will implement the incremental additional costs necessary into its current on-going reporting for the implementation costs.

NOTICE OF RATE PLAN NAME CHANGES

25. While the Company is not required or seeking approval from the Commission to change the brand name of its various tariffed rate plans, the Company is providing notice that it intends to modify the name for certain rate plans. The Company proposal to change the default rate from the Commission’s previously ordered high differential 2-period TOU rate to the low

¹² Report and Order, p. 99, Re Evergy Rate Case, File Nos. ER-2022-0129 and ER-2022-0130.

differential Peak Adjustment TOU rate necessitates a change to the name of the rate plans in order to avoid future confusion on which rate is the standard or default rate. In order to be more descriptive for customers who are choosing their rate plans, Evergy proposes to change the names of (1) the high differential 2-period TOU rate from “Standard Peak Saver” to “Summer Peak Time Based Plan” and (2) the low differential Peak Adjustment TOU rate from “Peak Reward Saver” to “Default Time Based Plan.” This also addresses some stakeholder feedback so each name describes the rate option without emphasizing a “savings” aspect for the rate since other TOU rate options are likely to result in larger savings if customers modify their usage behavior. In addition, in the event that the Commission approves continuation of the traditional residential rate structure as a rate plan option, the Company intends to name this rate plan the “Anytime Plan”.

MOTION FOR EXPEDITED TREATMENT

26. Pursuant to 20 CSR 4240-2.080(14), the Company requests that the Commission issue an order in this docket as soon as possible with an effective date no later than Friday, September 29, 2023 so that the Company may transition all applicable customers to a TOU rate plan by the end of the year, as ordered by the Commission. There will be no negative effect on the Company’s customers or the general public if the Commission acts by this date. This date would also provide a decision from the Commission that will allow the new default rates to go into effect consistent with the previously ordered default transition schedule. This application was filed as soon as it could have been following the Commissioner discussion at the August 30, 2023, Agenda meeting.

MOTION TO APPROVE TARIFFS ON LESS THAN 30 DAYS’ NOTICE

27. Concurrent with the filing of this Application, Evergy is also filing tariff sheets with a 30-day effective date, as required by law, to implement the proposed revisions to its TOU Implementation Plan. Evergy respectfully requests that the tariffs be allowed to go into effect on less than 30-days' notice (by September 29, 2023), for good cause shown. The good cause for this

request is that the changes to the TOU Implementation Plan are needed and in the public interest to avoid further confusion and misinformation regarding the Commission-mandated TOU rates, and to avoid the high differential 2-period TOU rate from going into effect as the default rate in October 2023.

REQUEST FOR HEARING

28. Given the expedited nature of this request, Evergy requests the Commission immediately schedule and convene an evidentiary hearing with live testimony from the Company, and any other interested stakeholder to allow Staff, Public Counsel or other stakeholders to testify and/or comment on the proposed changes to the TOU Implementation Plan, and allow the Commissioners, Regulatory Law Judge, and other parties to ask any questions regarding the Company's proposal.

WAIVER OF 60-DAY NOTICE

29. 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 under 4.017(1)(D). 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 is currently under the requirement to implement the TOU program no later than October 1, 2023 and the 60-day notice requirement would delay the filing of the Application after this date. Since there has been intense interest by the public, legislators, the press and other interested parties, the Company has had some communication with the office of the commission within the prior 150 days regarding substantive issues involving the implementation of its TOU rate plans. These

discussions include Commissioner and legal advisor staff participation at an Agenda Meeting on August 10, 2023, the TOU implementation workshop in File No. EW-2023-0199 and other more informal discussions concerning TOU implementation.

WHEREFORE, Evergy Missouri Metro and Evergy Missouri West respectfully request that the Commission issue an order approving the revised tariffs to be effective no later than September 29, 2023, waive for good cause the provisions of 20 CSR 4240-4.017(1), and for additional relief as found appropriate by the Commission.

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.



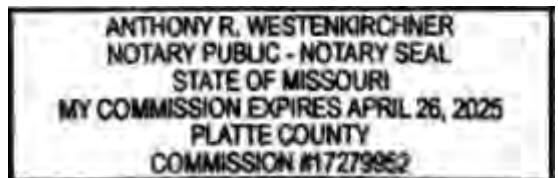
Darrin Ives

Subscribed and sworn to before me this 8th day of September 2023.



Notary Public

My Commission Expires: 4/26/2025



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 8th day of September 2023.

/s/ Roger W. Steiner

Roger W. Steiner



Time-Based Rate Campaign Tracker

Missouri residential customer survey

(23-0013)

August 2023





Methodology

Evergy's Missouri Residential Customers

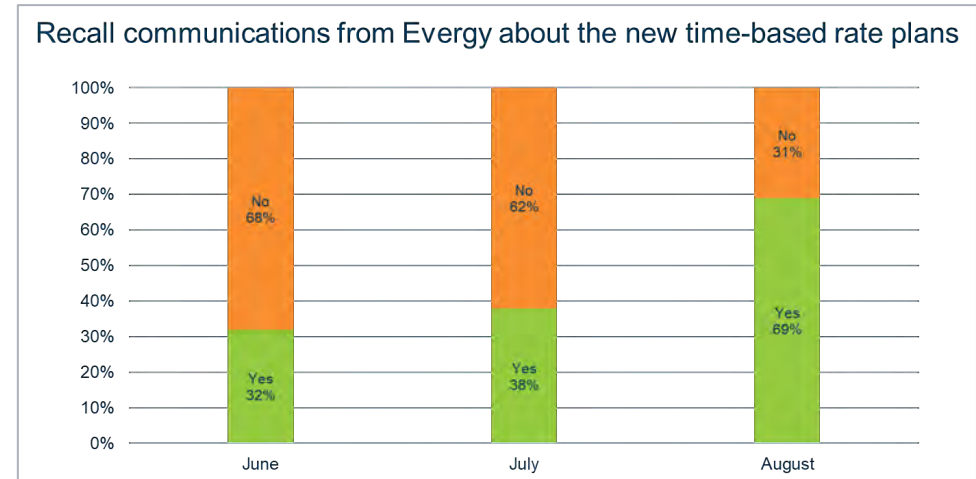
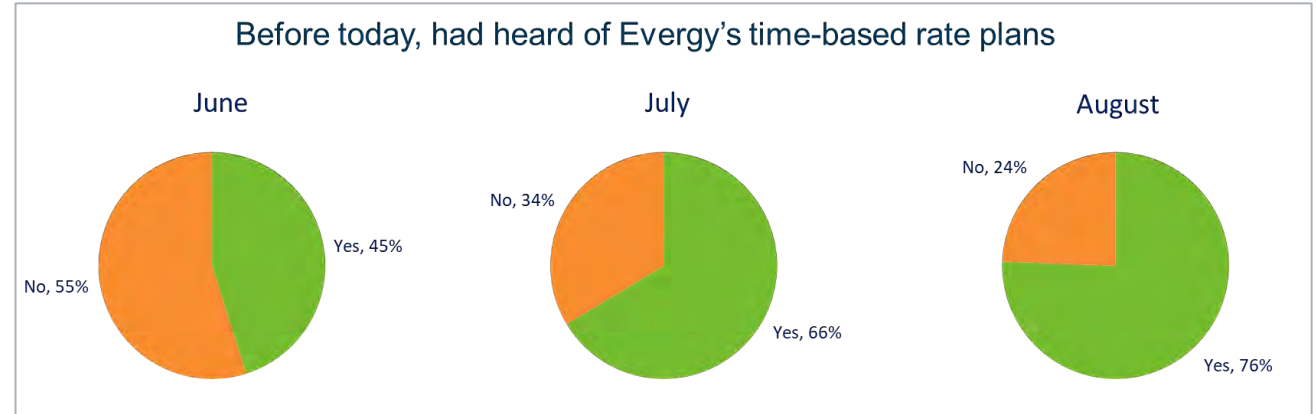
- Evergy email survey to Missouri customers only
- Data collection: June - December 2023
- 40 questions

Evergy Mandated Time-Based Rate Campaign

Executive Summary

Evergy's Time-Based Rate Campaign has proven to be successful in creating awareness among Missouri residential customers.

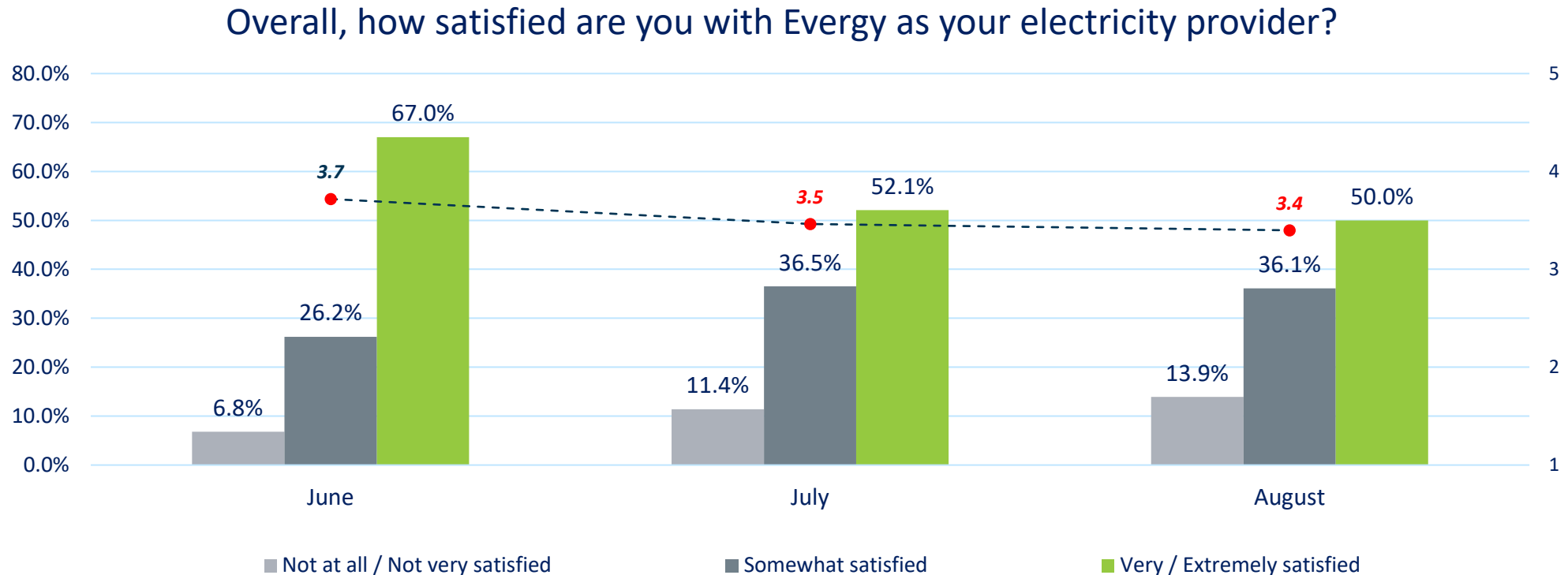
- In August, 76% of Missouri residential customers had heard about Evergy's time-based rates. That is a 68% increase from the baseline measurement in June.
- The number of Missouri residential customers who recall Evergy communications about the new time-based rates has doubled in the past couple of months (increased from 32% to 69%)
- Knowledge of Evergy's time-based rate plans is fairly low (15% Top 2 Box) and remains flat at this point. The details of the time-based rates are just now starting to be communicated in this phase of the campaign and were expected to be fairly low in August.
- There are specific demographics such as Gender, Age, and Income that will be highlighted throughout the report showing significant differences in the survey results.
 - In general, customers who are female, younger to middle aged, and low income customers are less aware and knowledgeable about Evergy's time-based rates at this time.





Customer Satisfaction with Evergy

Satisfaction is slowly declining like our other research results have been showing

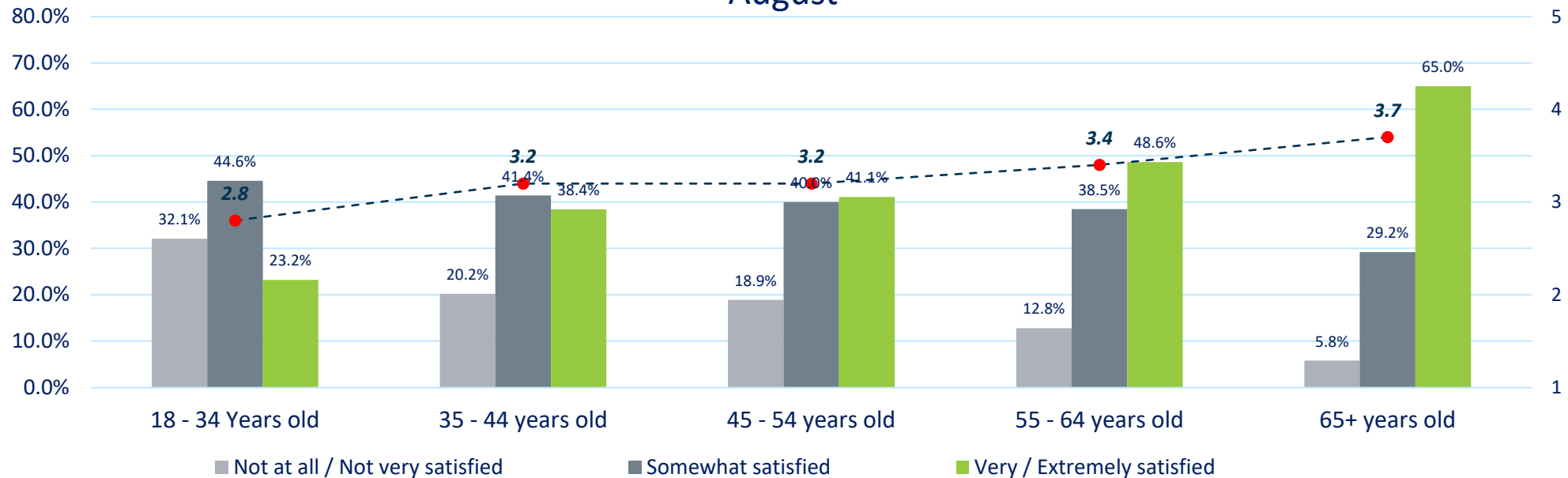




Customer Satisfaction with Evergy

Satisfaction increases with age and is highest among 65+ year olds

Overall, how satisfied are you with Evergy as your electricity provider?
August

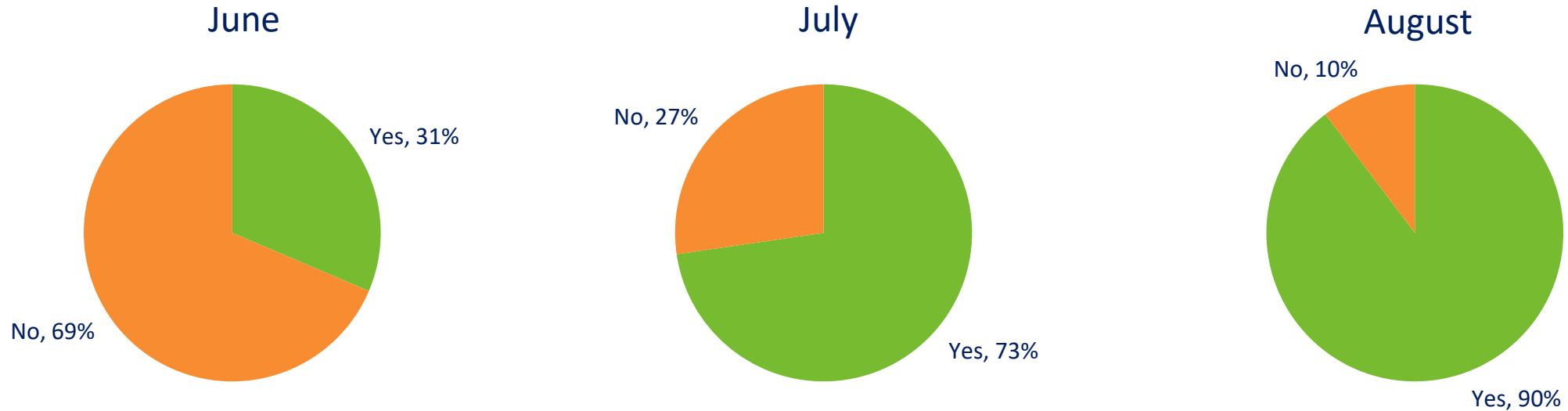




Seen or Heard of New Rate Options

In August, nine out of ten customers had seen or heard about Evergy's new rate options

Seen or heard anything recently about Evergy offering new rate plan options to customers?

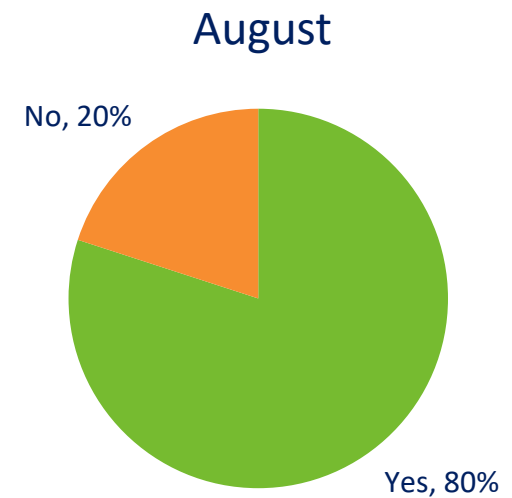
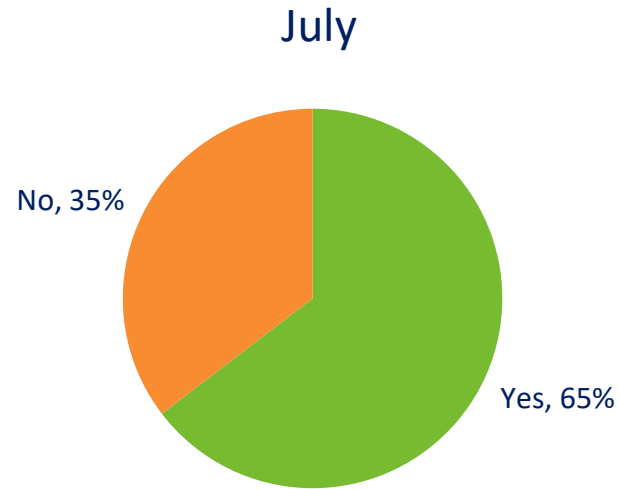
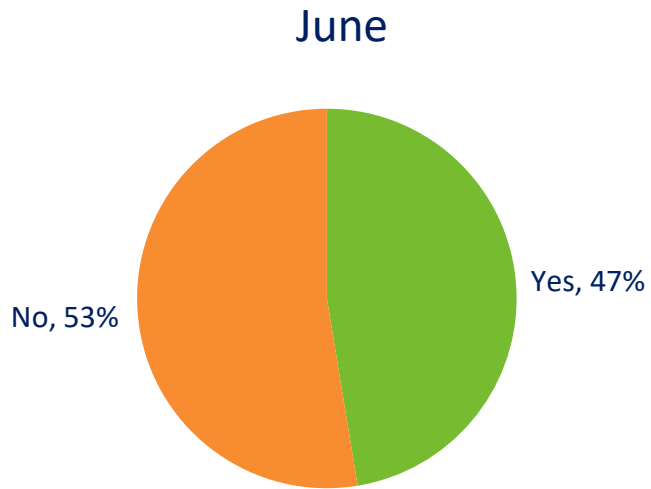




Awareness of Evergy Currently Offering Choices

Eight out of ten customers are aware that Evergy offers choices in rate plans

Aware that Evergy currently offers you choices of different types of rate plans?

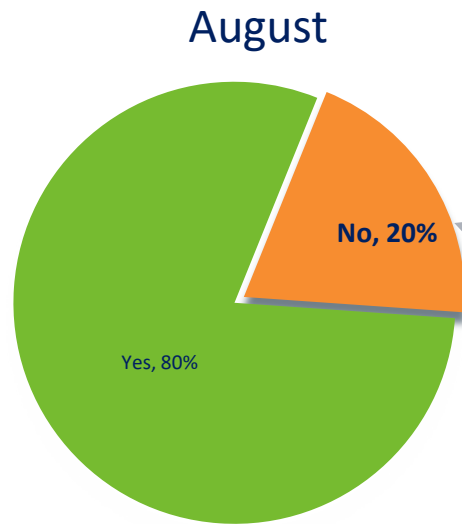




Customers Not Aware of Evergy Offering Choices

One-fifth (20%) of customers are not aware of Evergy offering choices

Customers who are not aware that Evergy currently offers you choices of rate plans



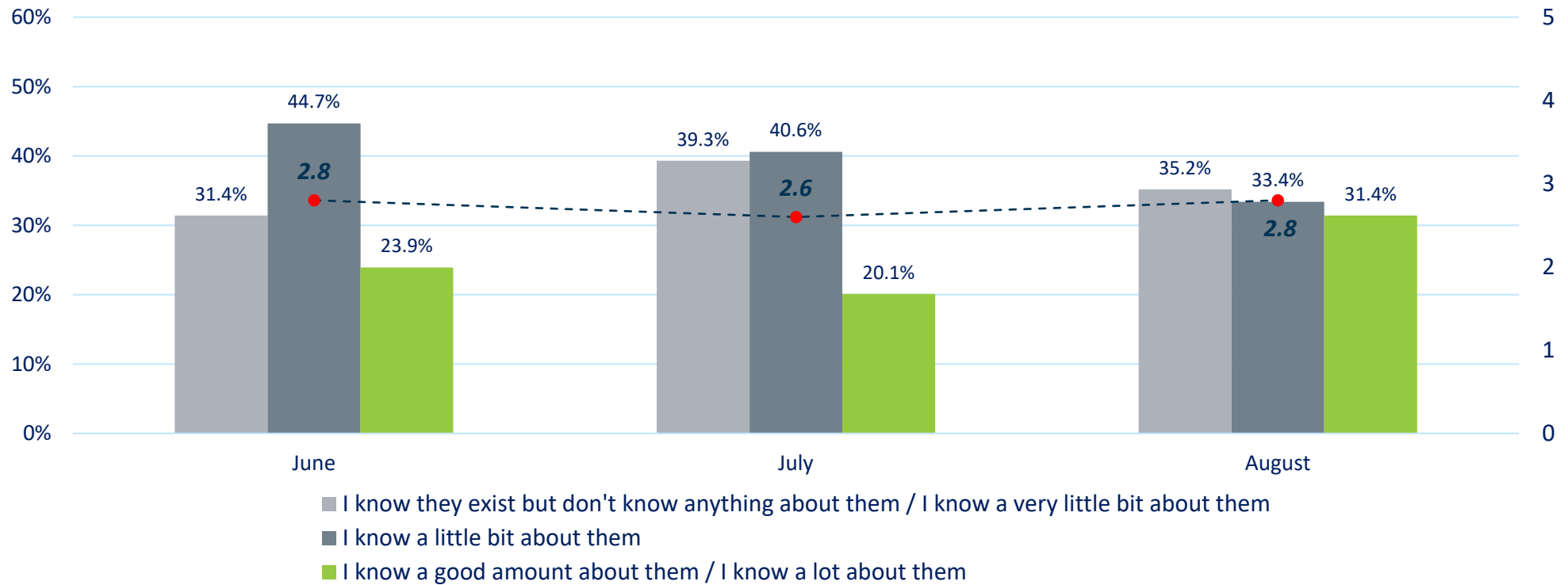
- Among those not aware of Evergy offering choices in rate plans, middle age customers **35 – 54 years old** are the most likely to not be aware
- **Female** customers are significantly more likely to not be aware of Evergy offering rate choices compared to male customers (24% vs. 17% respectively)
- 30% of **Low income** (less than \$30k) customers are not aware of Evergy offering rate options



Familiarity with Evergy Rate Plans

Familiarity with Evergy's rate plan offerings is slowly increasing

Familiarity with the different type of rate plans available from Evergy

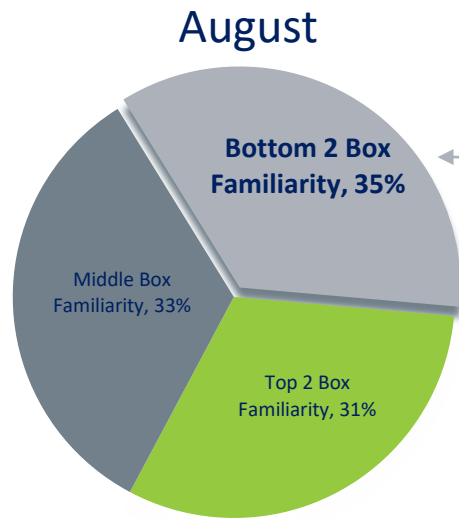




Customers with Limited Familiarity with Evergy Rate Plans

Just over one-third (35%) of customers indicated they are not familiar with Evergy's rate plans at this point

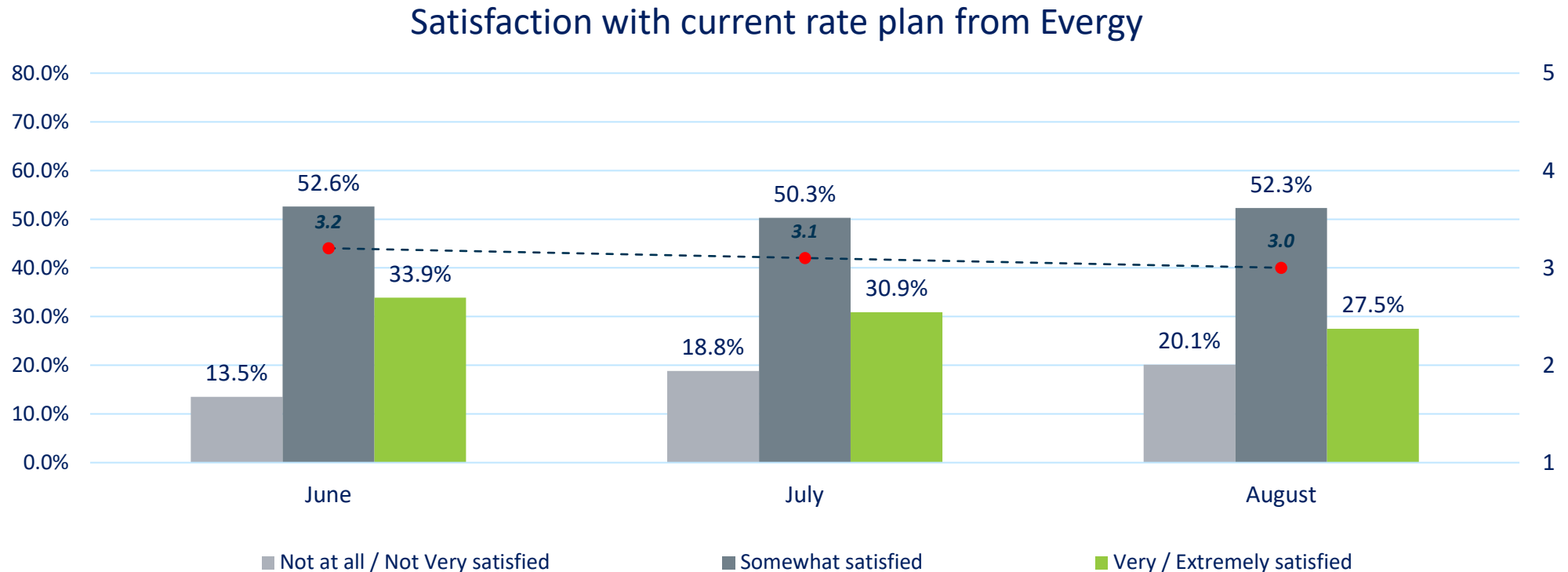
Customers not familiar with Evergy's rate plans



- Familiarity of Evergy's rate plans is significantly less among customers **45 – 64 years old** vs. customers 18 – 34 years old (40% vs. 21% respectively)
- **Female** customers are significantly less familiar with Evergy's rate plans vs. male (42% vs. 30% respectively)

Customer Satisfaction with Current Rate Plan

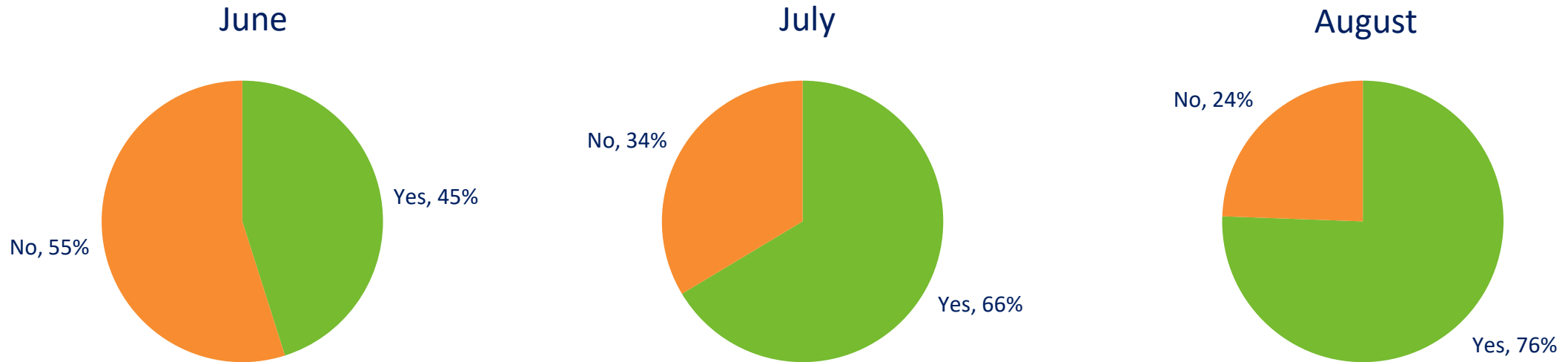
Satisfaction with current rate plan is holding steady at “Somewhat Satisfied”



Heard of Evergy's Time-Based Rate Plans

Three out of four customers had heard about Evergy's time-based rate plans

Before today, had heard of Evergy's time-based rate plans

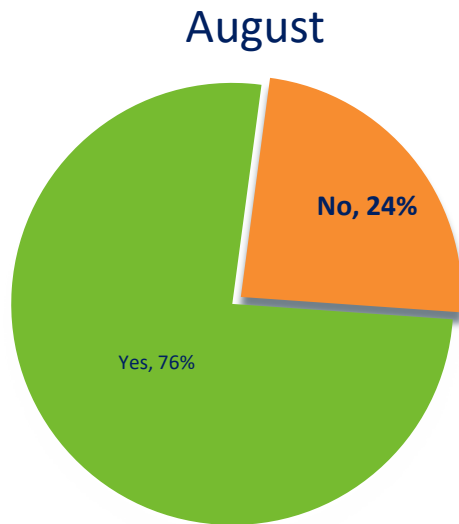




Customers Who Have Not Heard of Time-Based Rates

One out of four (24%) customers indicated they had not heard about Evergy's time-based rates before the survey

Before today, had NOT heard of Evergy's time-based rate plans



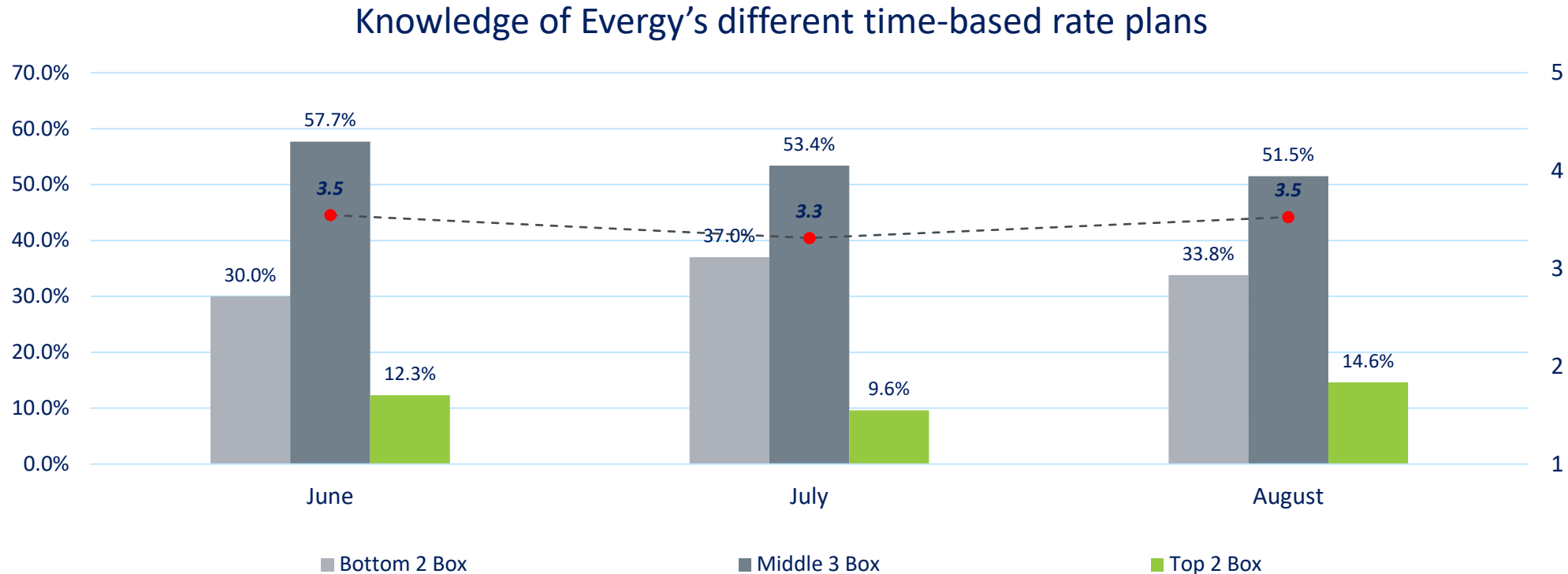
- **Female** customers are significantly more likely to have not heard of time-based rates compared to males (28% vs. 20% respectively)
- **Low income** (less than \$30k) customers are significantly more likely to have not heard of time-based rates compared to higher income customers (Between \$30,000 - \$69,999 / Between \$70,000 - \$124,999 / \$125,000 or more) (39% vs. 25% / 17% / 13% respectively)
- **Renters** are significantly more likely to have not heard of time-based rates compared to customers who own their home (38% vs. 21% respectively)

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Knowledge of Evergy's Different Time-Based Rate Plans

Knowledge of Evergy's time-based rate plans is remaining flat at this point in the communications campaign

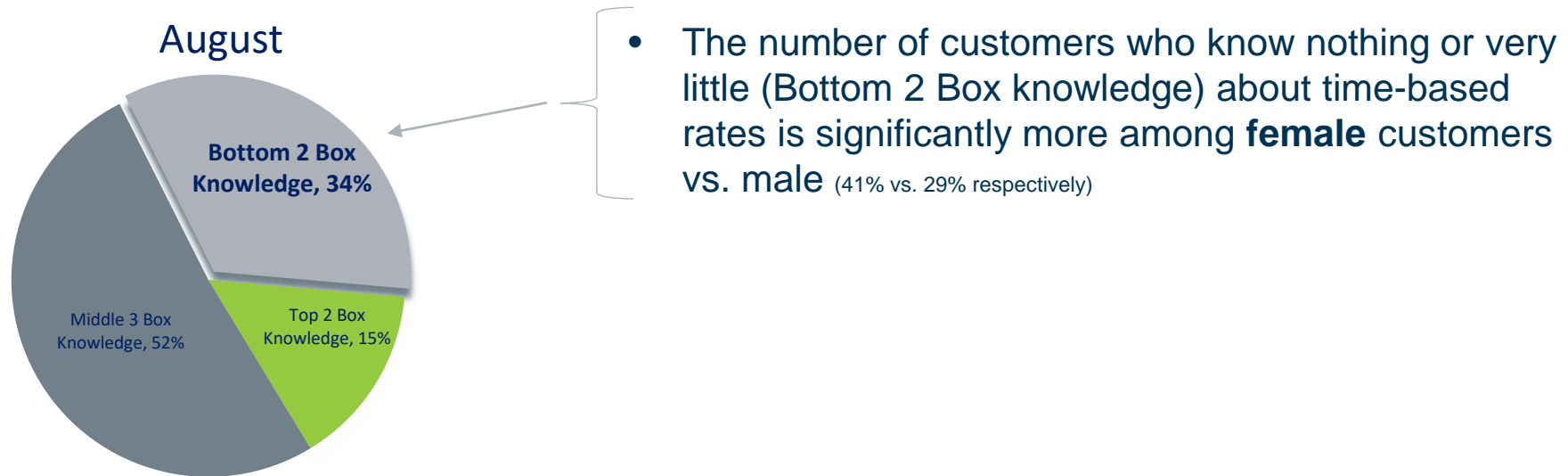




Customers with Limited Knowledge of Time-Based Rates

Just over one-third (34%) of customers indicated they know nothing or very little about Evergy's time-based rates at this point

Knowledge of Evergy's different time-based rate plans

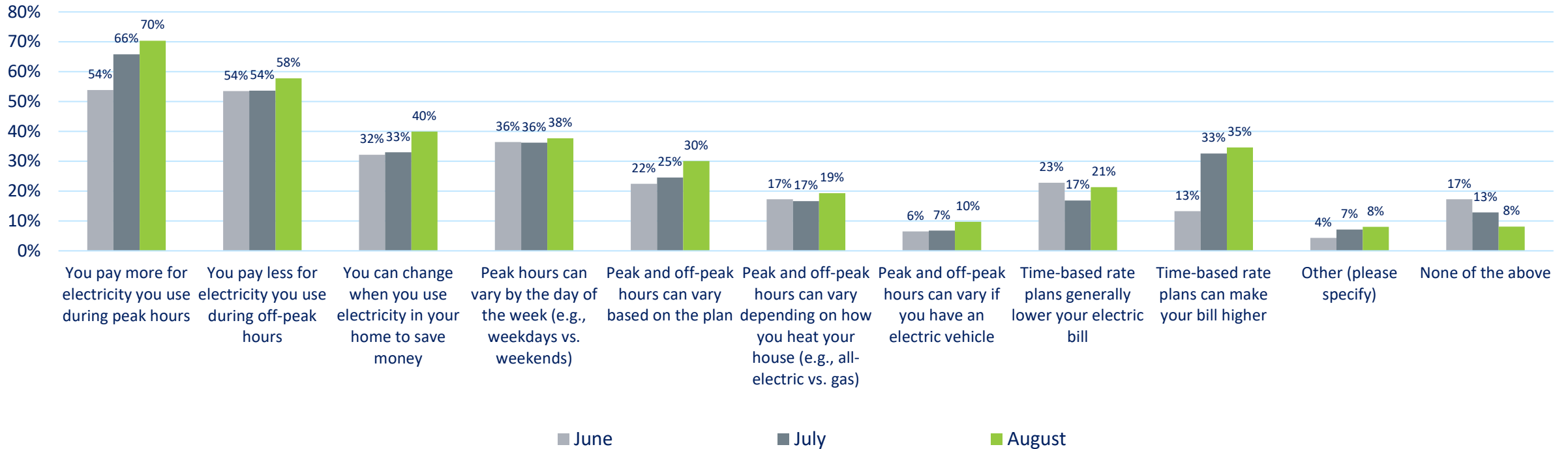




Statements Believed To Be True About Time-Based Rates

Most customers know very little about the details of time-based rates but we have seen small increases in August

Believed to be true about time-based rates

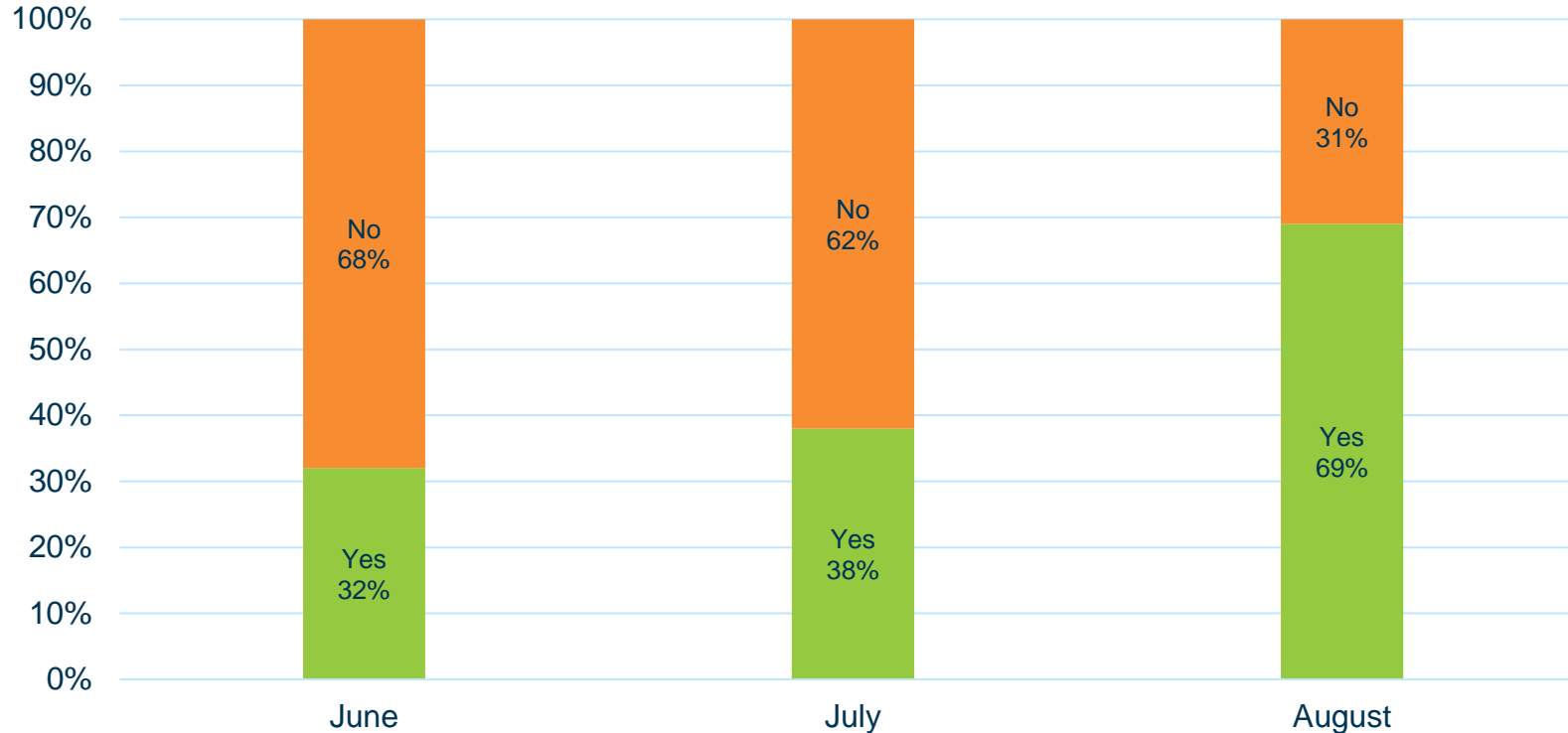




Recall Communications About Time-Based Rate Plans

Two out of three customers recall communications about Evergy's time-based rate plans

Recall communications from Evergy about the new time-based rate plans

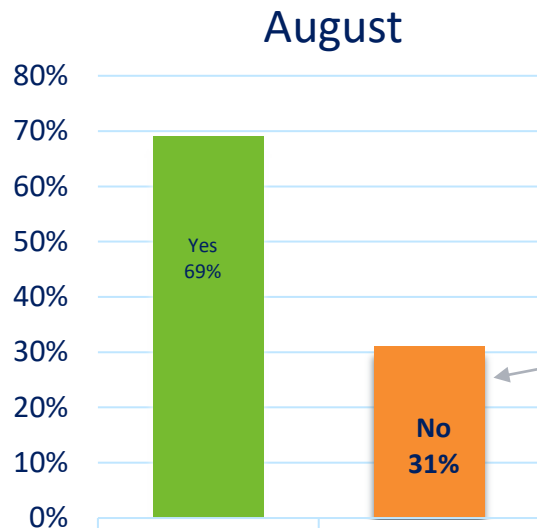




Do Not Recall Time-Based Rate Communications

Just under one-third (31%) of customers do not recall any time-based rate plan communications from Evergy

Do NOT recall Evergy's time-based rate communications



- **Female** customers are significantly more likely to not recall communications about Evergy's time-based rates compared to males (36% vs. 28% respectively)
- **Low income** (less than \$30k) customers are significantly more likely to not recall communications about Evergy's time-based rates compared to higher income customers (Between \$70,000 - \$124,999 / \$125,000 or more) (44% vs. 25% / 27% respectively)
- **Renters** are significantly more likely to not recall communications about Evergy's time-based rates compared to customers who own their home (40% vs. 29% respectively)

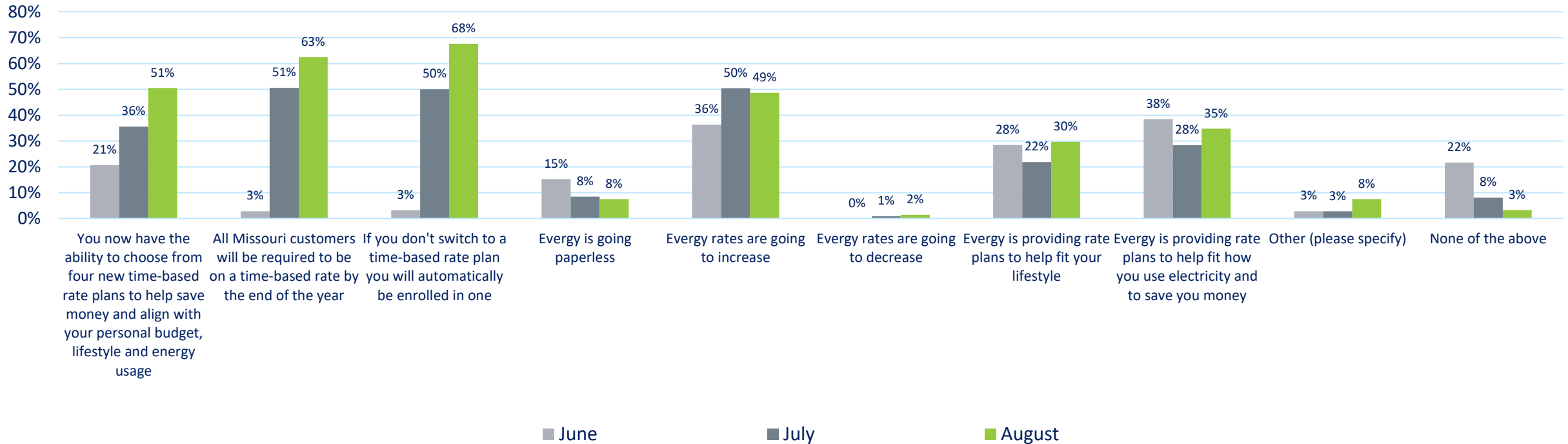
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Changes To Your Electric Service

Awareness of time-based rate changes is significantly increasing

Changes to your Evergy electric service





Cost of Electricity Will Vary Based On Time Of Day Awareness

The number of customers who are aware that cost of electricity will vary based on time of day by end of 2023 has tripled since June

Aware cost of electricity will vary based on the time of day by the end of 2023

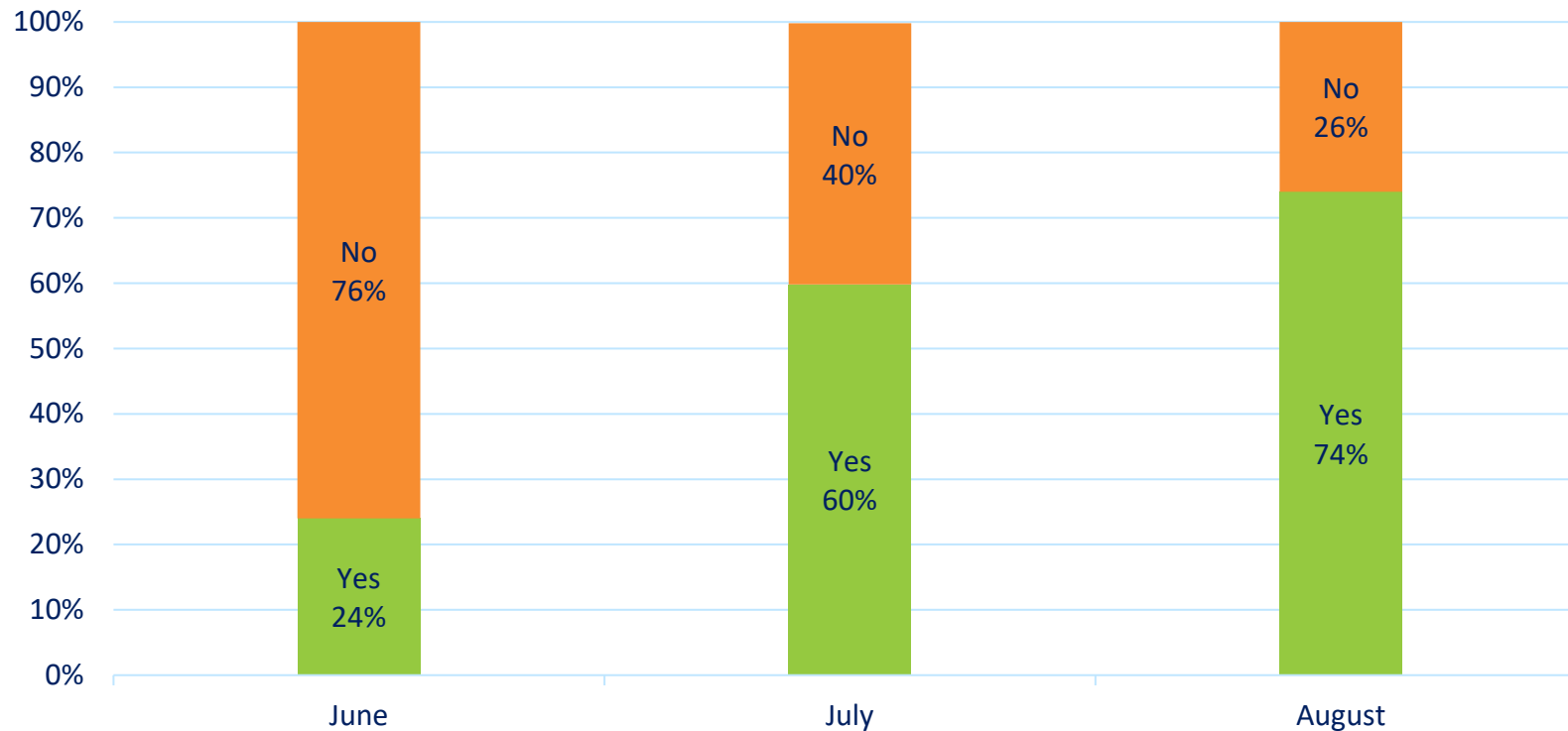


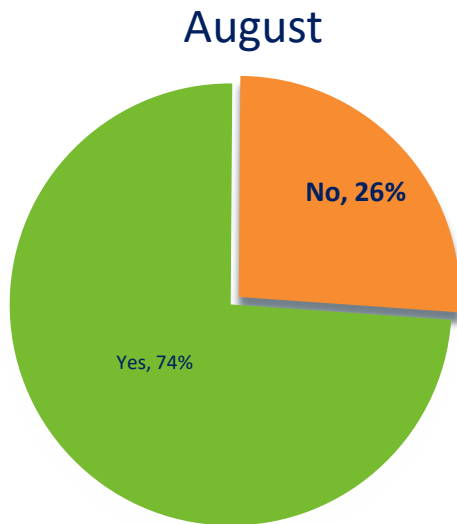
Exhibit A - Page 20 of 41



Customers Not Aware That Cost Will Vary By Time

Approximately one out of four (26%) customers were unaware that cost of electricity will vary based on time of day before this survey

Before today, were NOT aware that cost of electricity will vary by time



- One-third (34%) of customers between the ages of **45 – 54 years old** were unaware that cost of electricity will vary by the time of day
- **Female** customers are significantly less likely to know about cost of electricity varying by time of day compared to males (30% vs. 21% respectively)
- 40% of **Low income** (less than \$30k) were not aware that the cost of electricity will vary by time of day at the end of 2023
- **Renters** are significantly less likely to know about varying cost compared to customers who own their home (36% vs. 22% respectively)

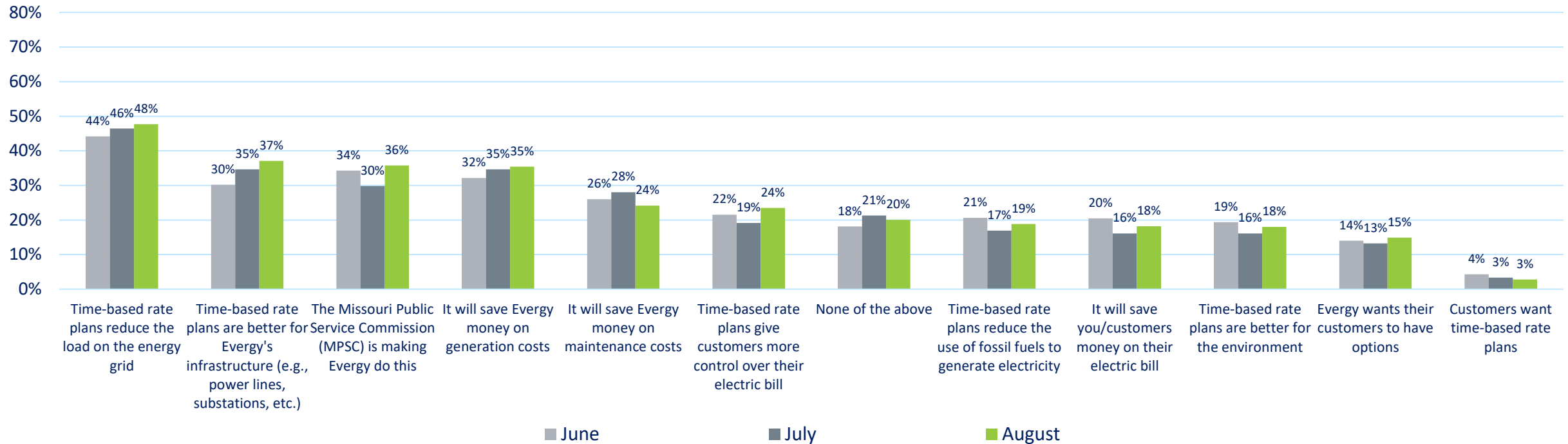
Exhibit A - Page 21 of 41



Reasons for Switching to Time-Based Rates

Perception that time-based rates benefit Evergy more than the customers

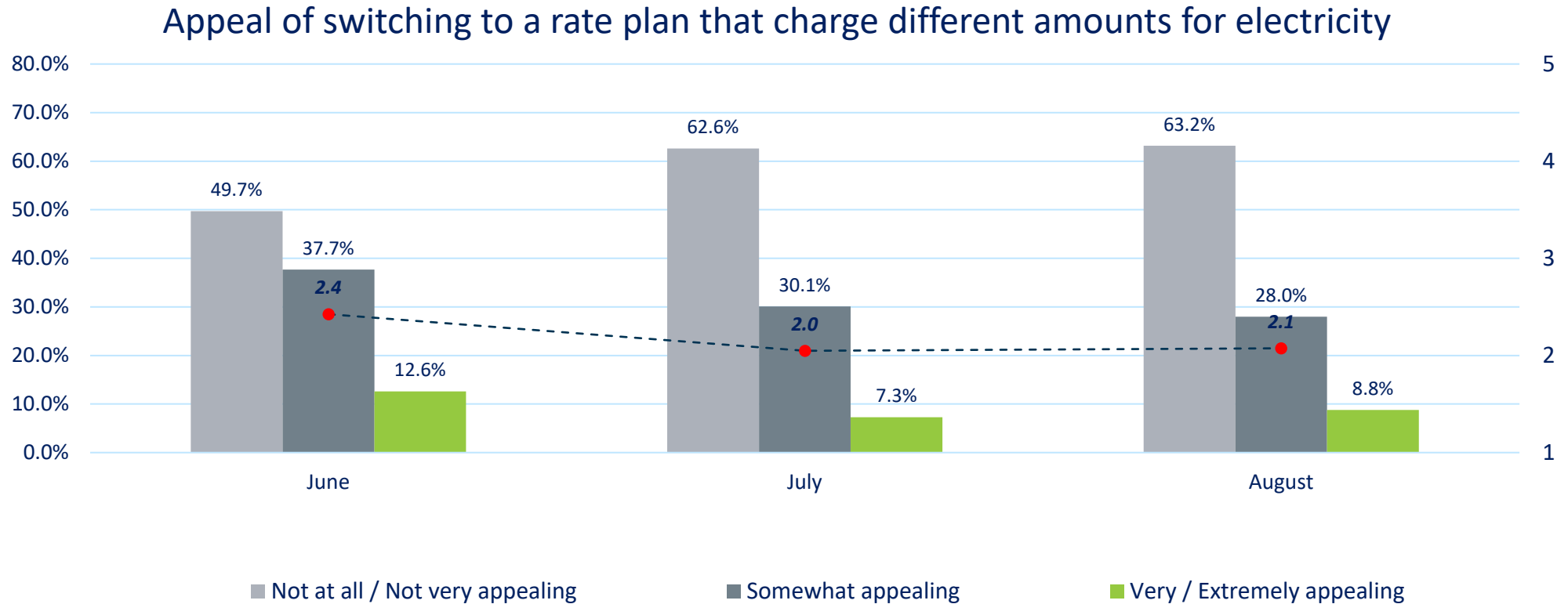
Reasons you believe Evergy is switching customers to a time-based rates





Appeal of Switching to Time-Based Rate

Almost two-thirds (63%) of customers indicated switching to time-based rates is Not very appealing or Not at all appealing



Appeal of Choosing a Time-Based Rate Plan

The number of customers who find the idea of choosing a time-based rate plan to be appealing has declined over the past two months

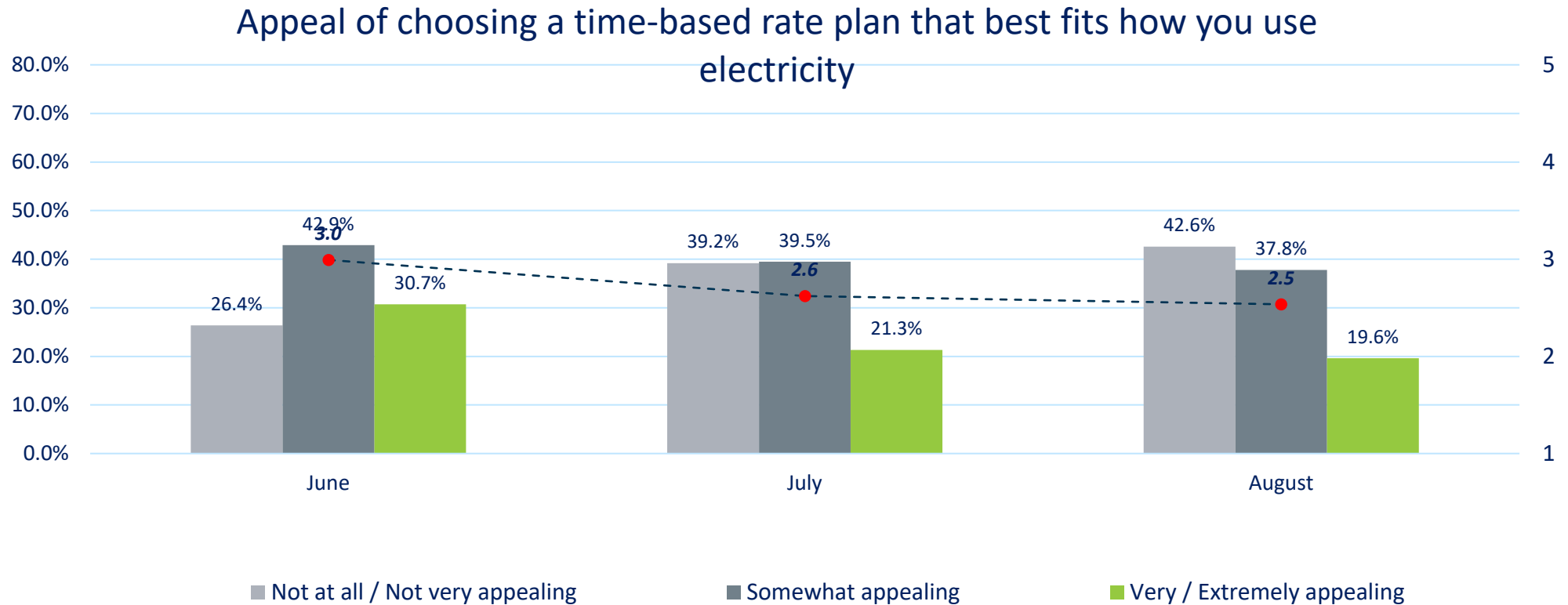
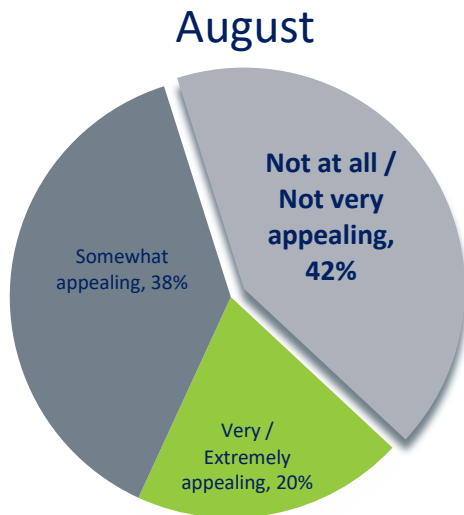


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Appeal of Choosing a Time-Based Rate Plan

Two out of five (42%) customers feel that choosing a rate plan that best fits how you use electricity is Not Very Appealing or Not At All Appealing

Appeal of choosing a time-based rate plan that best fits how you use electricity

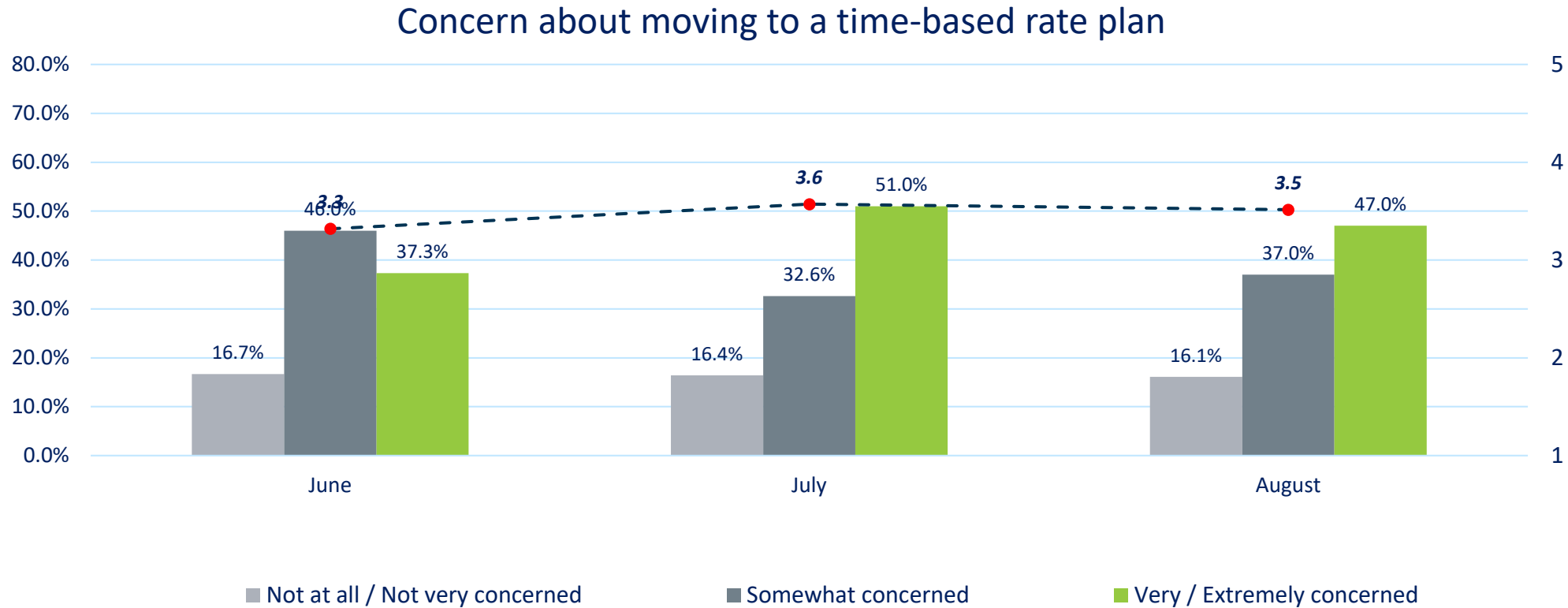


- The appeal of choosing a time-based rates is significantly less appealing (Not Very Appealing/Not At All Appealing) among customers **35 – 64 years old** vs. customers 65+ years old (50% vs. 31% respectively)
- **Males** find choosing a time-based rate that best fits their electric usage significantly less appealing (Not Very Appealing/Not At All Appealing) than females (48% vs. 34% respectively)



Concern About Switching to Time-Based Rate Plan

The number of customers who are Very concerned or Extremely concerned about switching to time-based rates has increased slightly

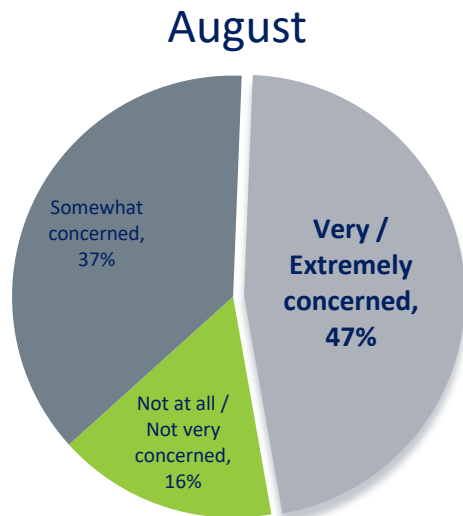




Concern About Switching to Time-Based Rate Plan

Just under half (47%) of customers are Very Concerned or Extremely Concerned about switching to time-based rates

Concern about moving to a time-based rate plan

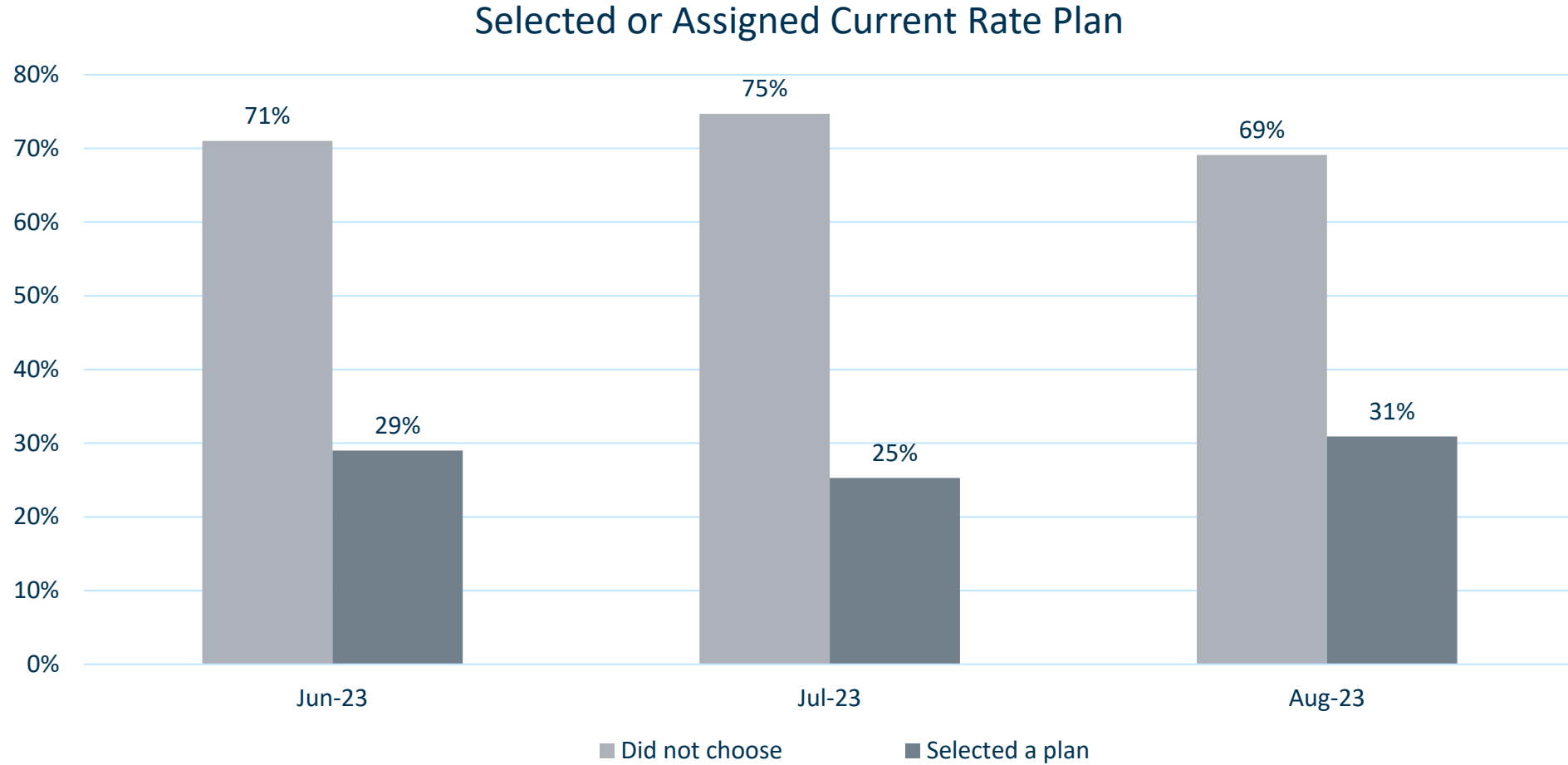


- Customers who are between **18 - 64 years old** are significantly more likely to be Very Concerned or Extremely Concerned compared to those who are 65+ years old (55% vs. 35% respectively)
- **MO West** customers are significantly more likely to be Very Concerned or Extremely Concerned compared to MO Metro customers (51% vs. 42% respectively)
- **Renters** are significantly more likely to be Very Concerned or Extremely Concerned compared to customers who own their home (55% vs. 45% respectively)

Appendix



Current Rate Plan





Selected Rate Plan

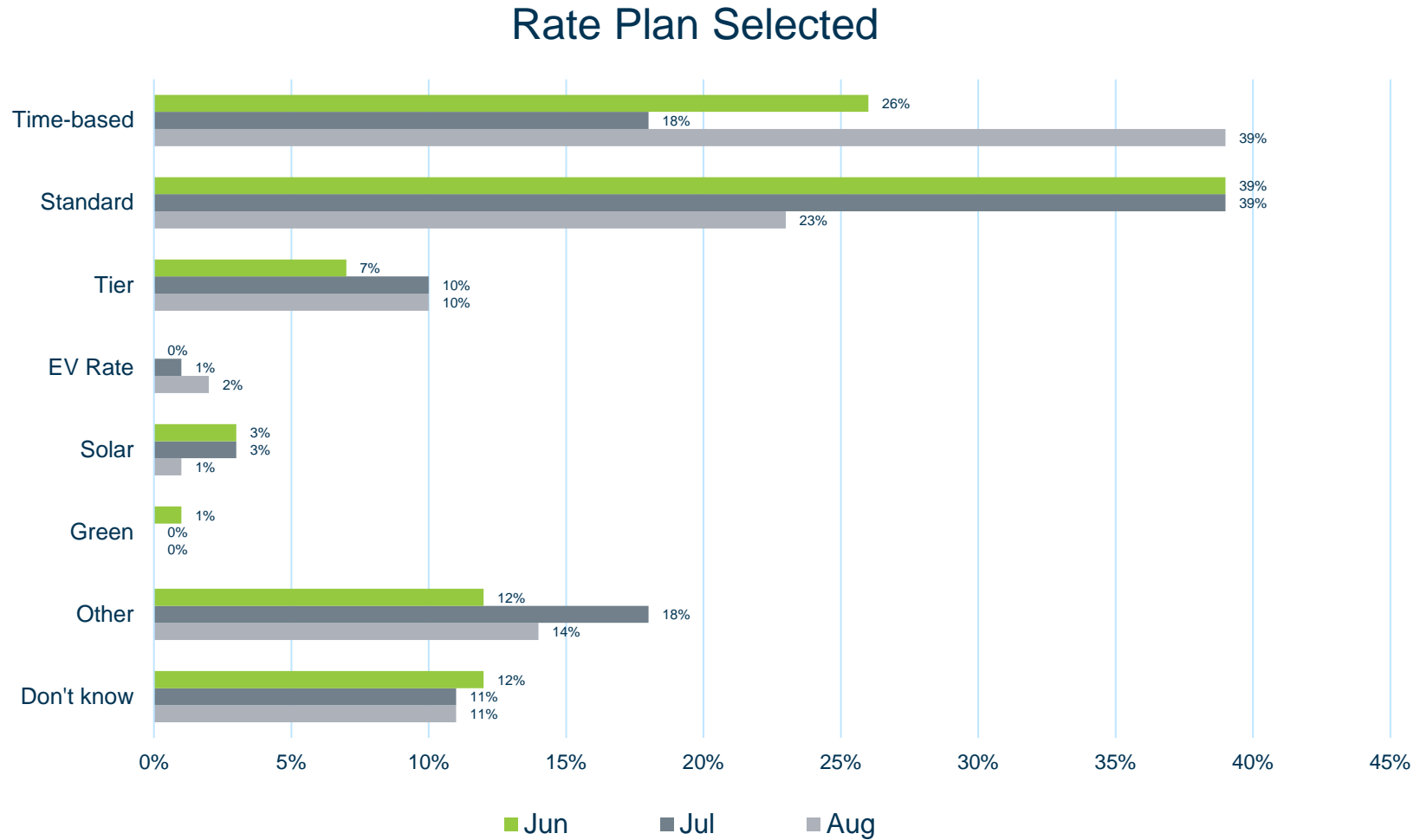


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Assigned Rate Plan

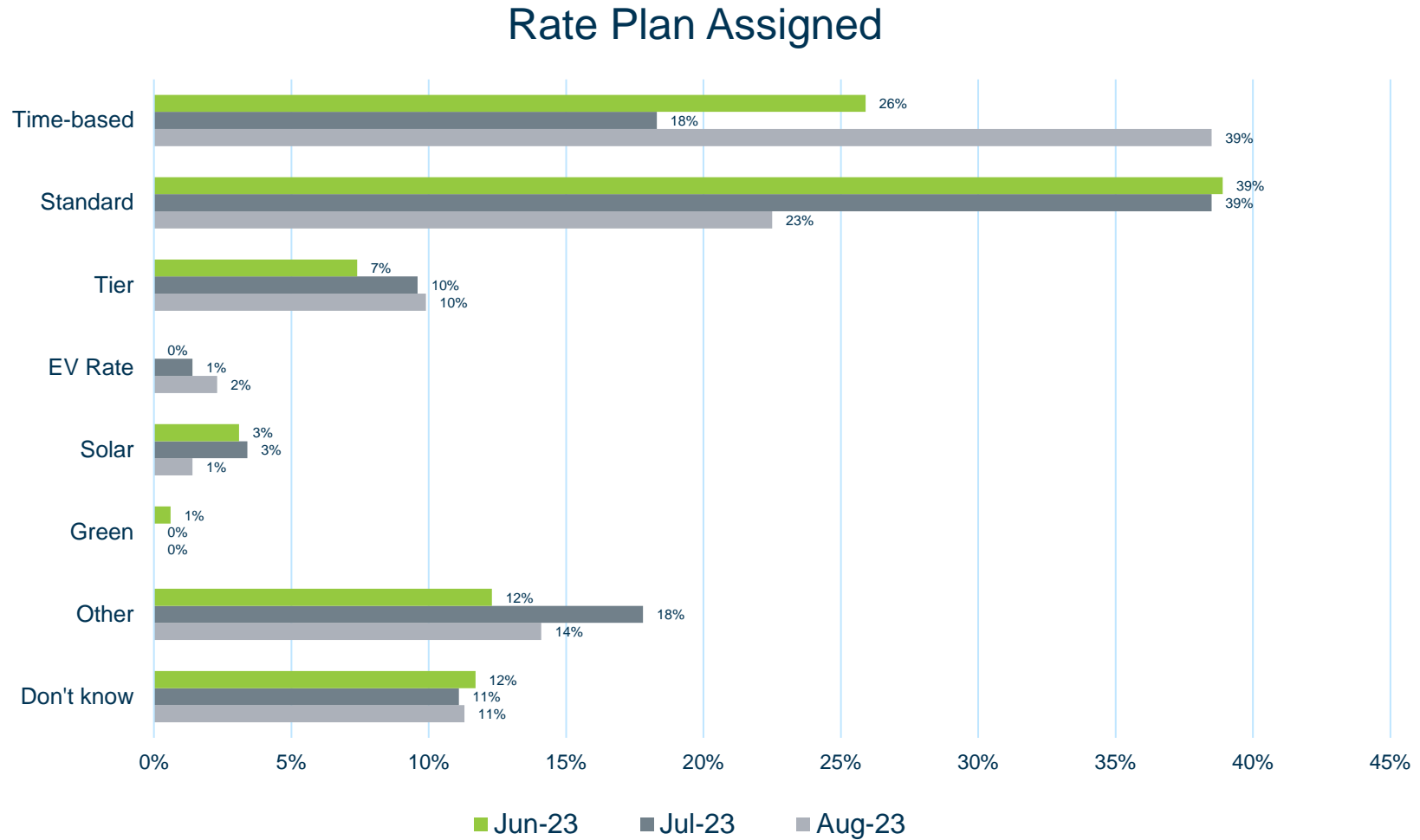


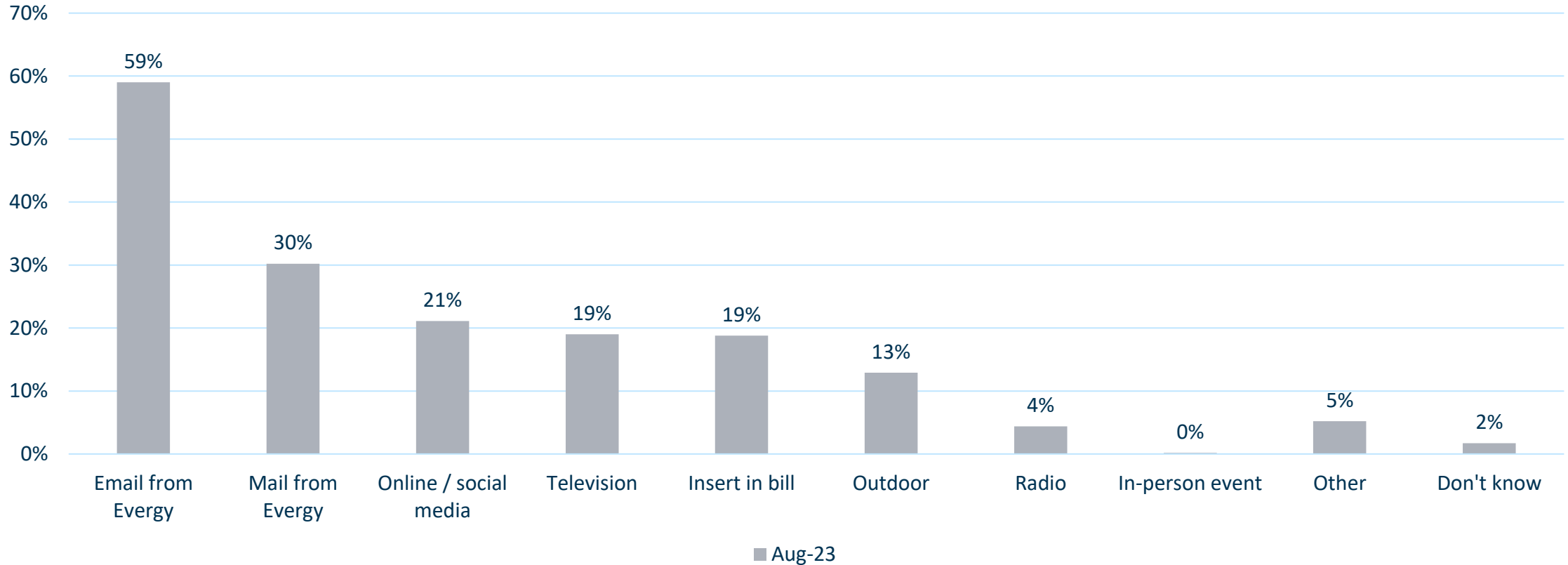
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Where Heard about These Changes

Where Heard about These Changes (If recall)



■ Aug-23
Exhibit A - Page 32 of 41



What Concerns about Switching to Time-based Rate Plan

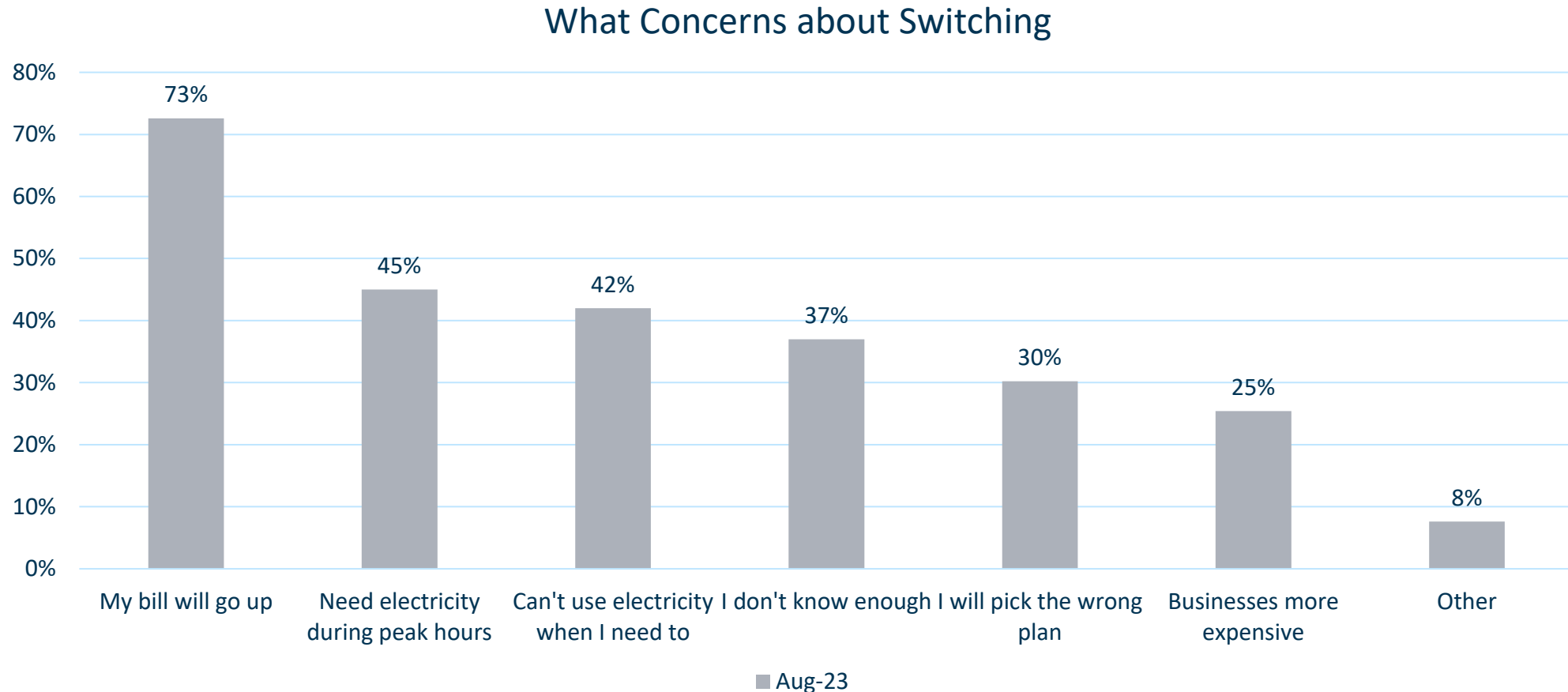
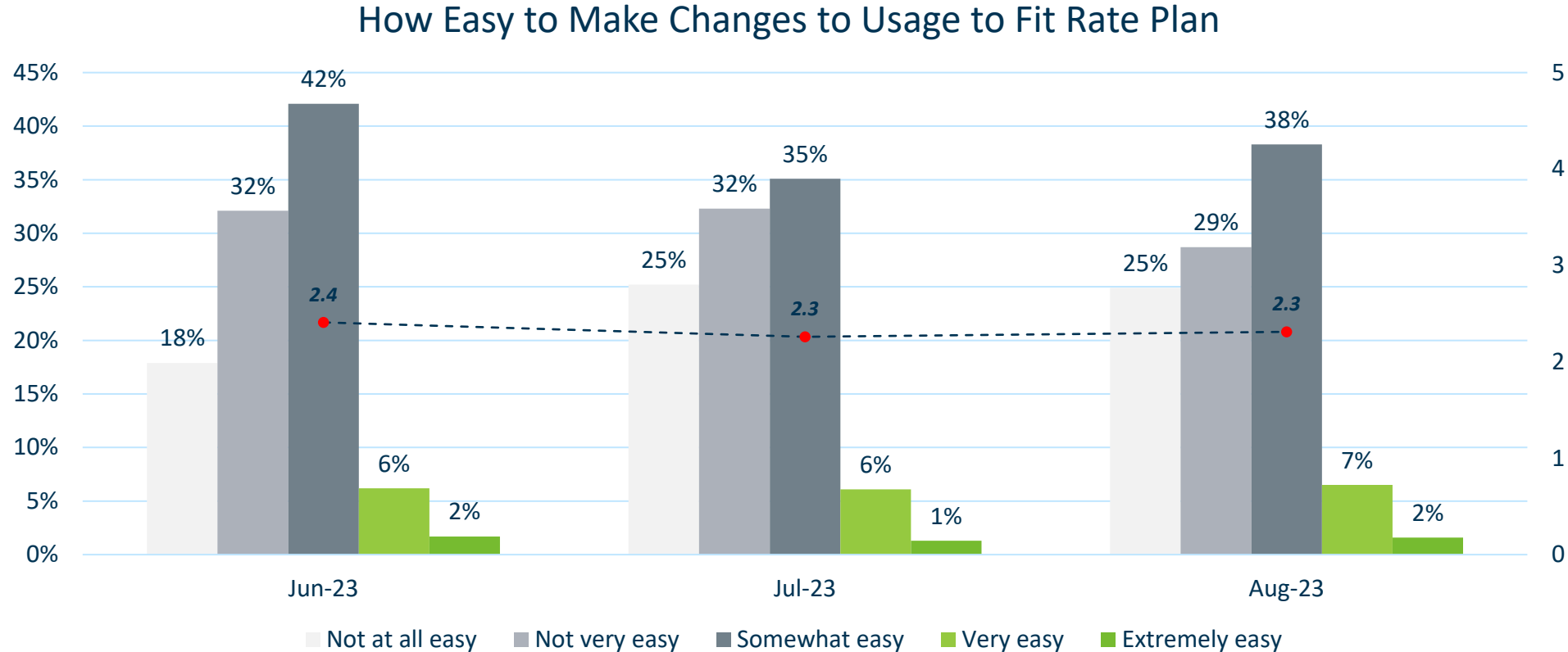


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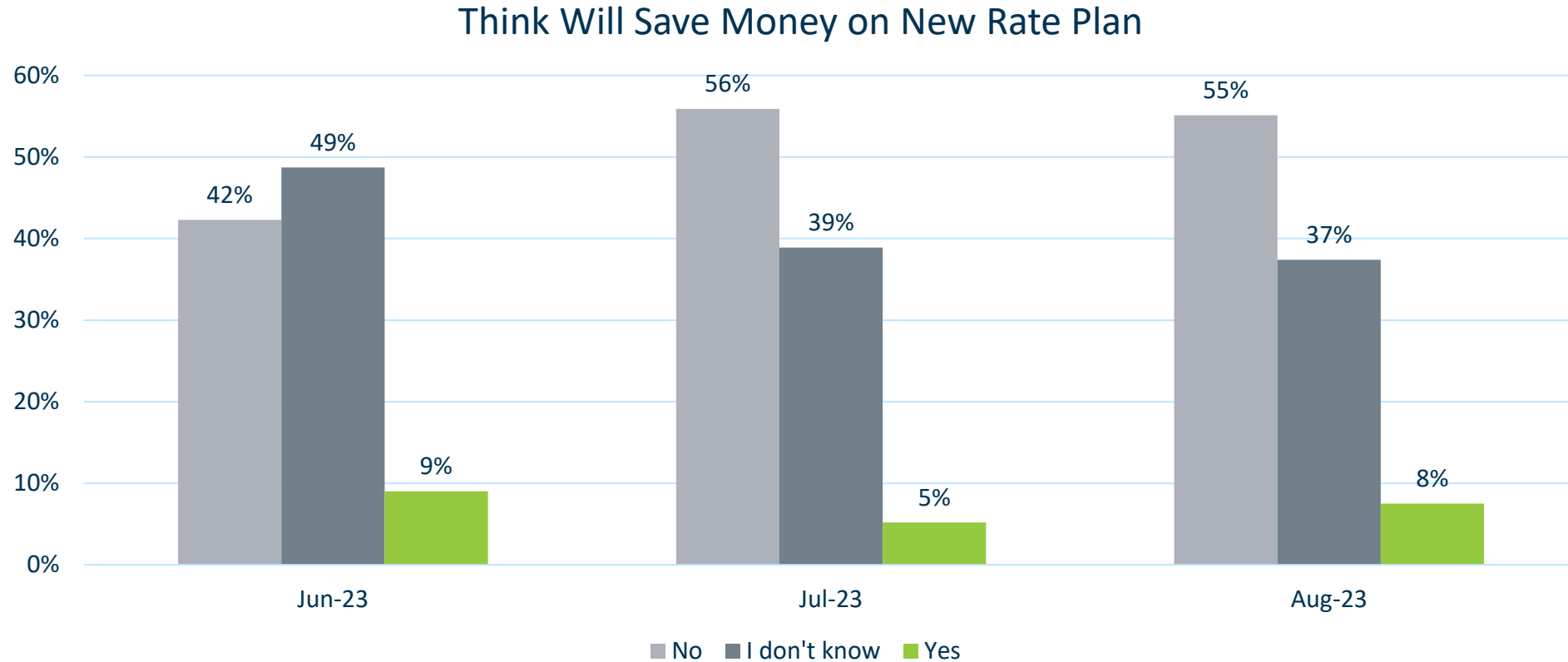
How Easy to Make Changes to Fit Rate Plan

Mean Score
YTD 2023 = 2.32





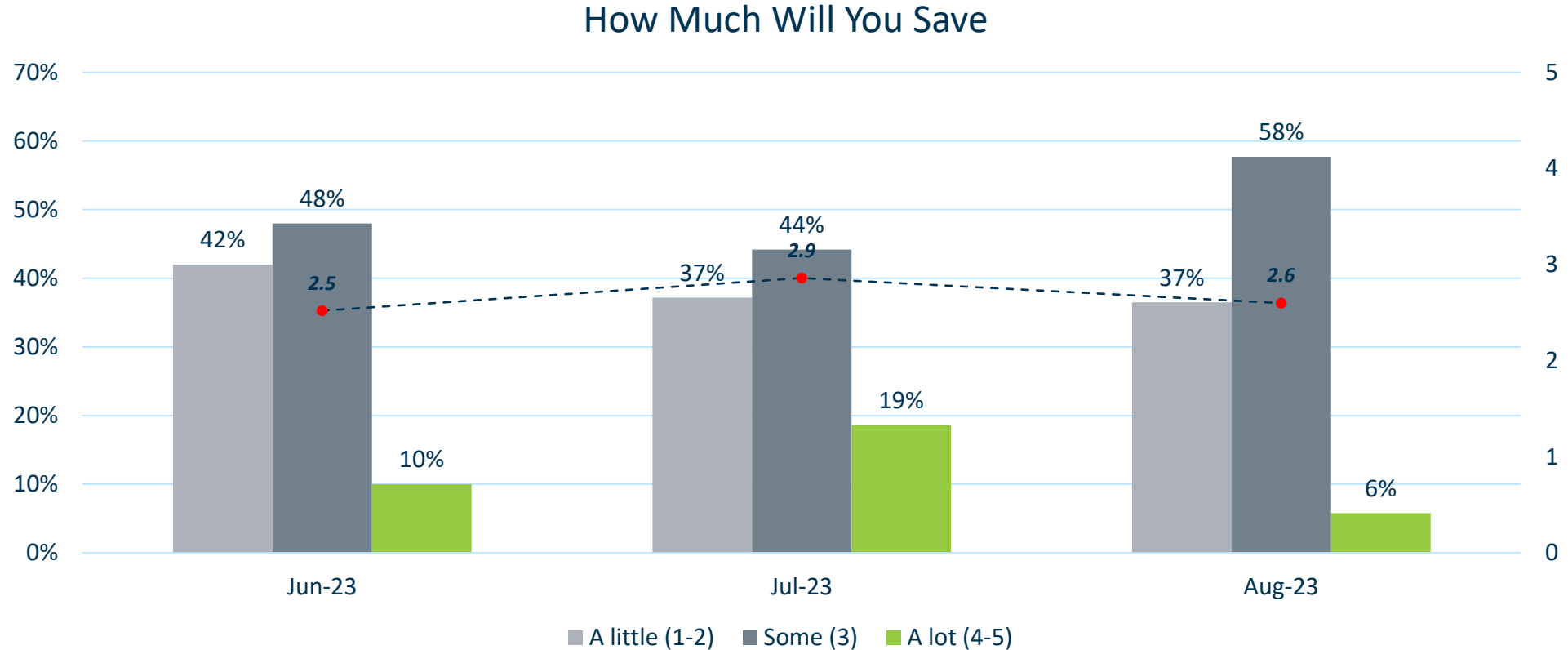
Will Save Money on New Rate Plan





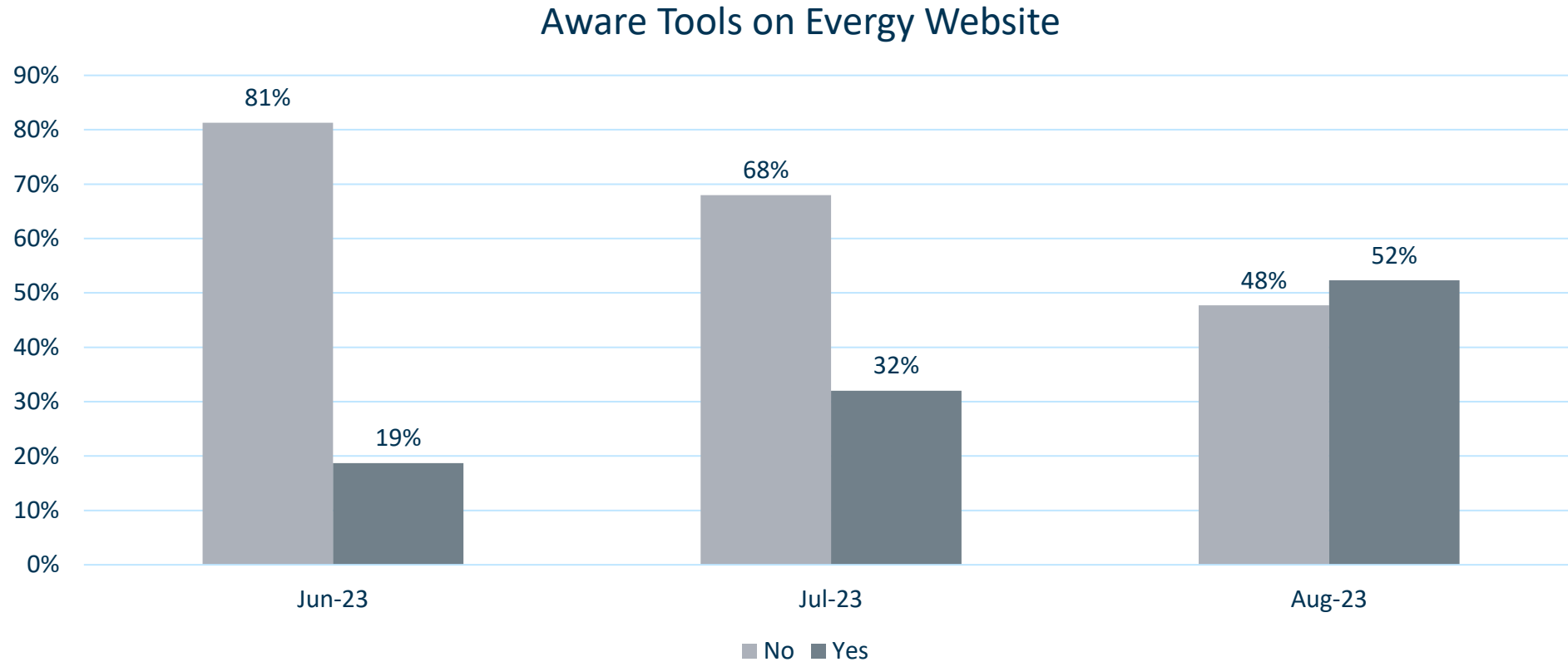
How Much will Save

Mean Score
YTD 2023 = 2.65



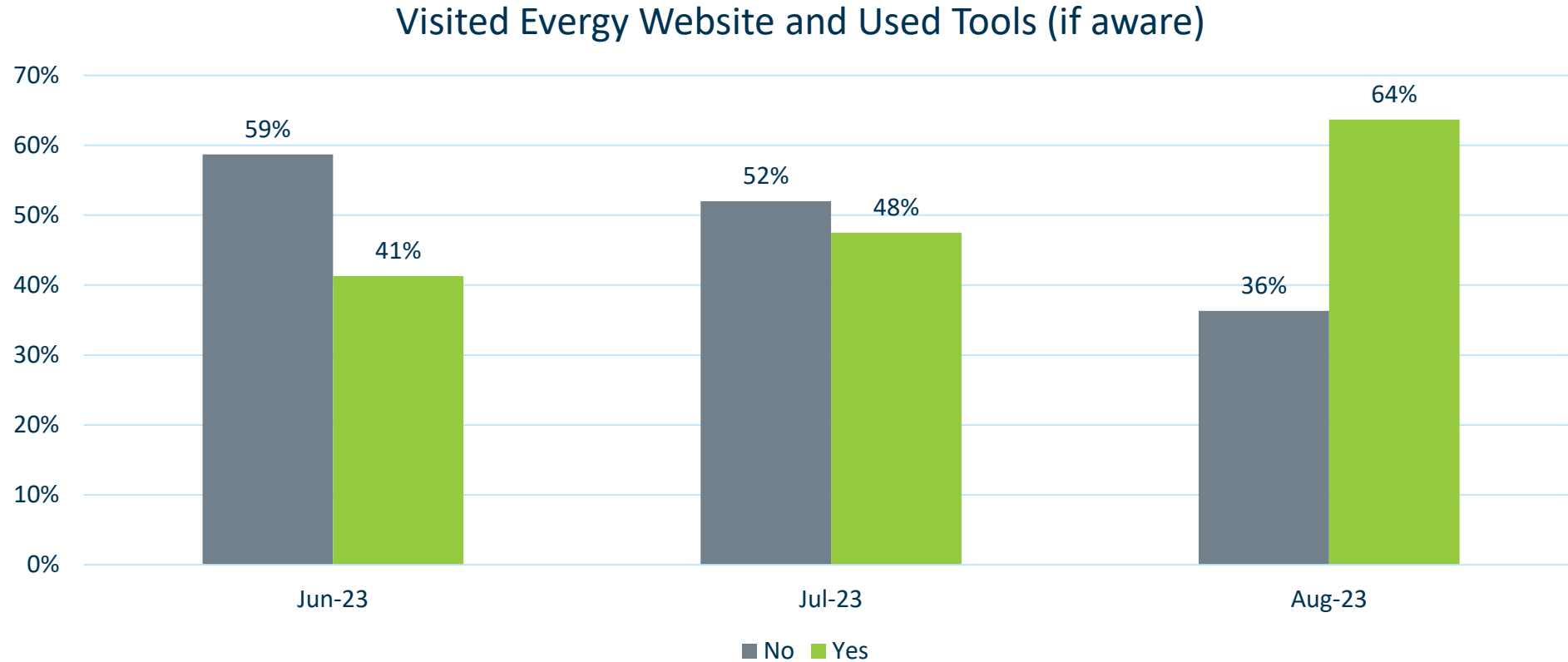


Aware of Tools on Evergy Website





Visited Evergy Website and Used Tools

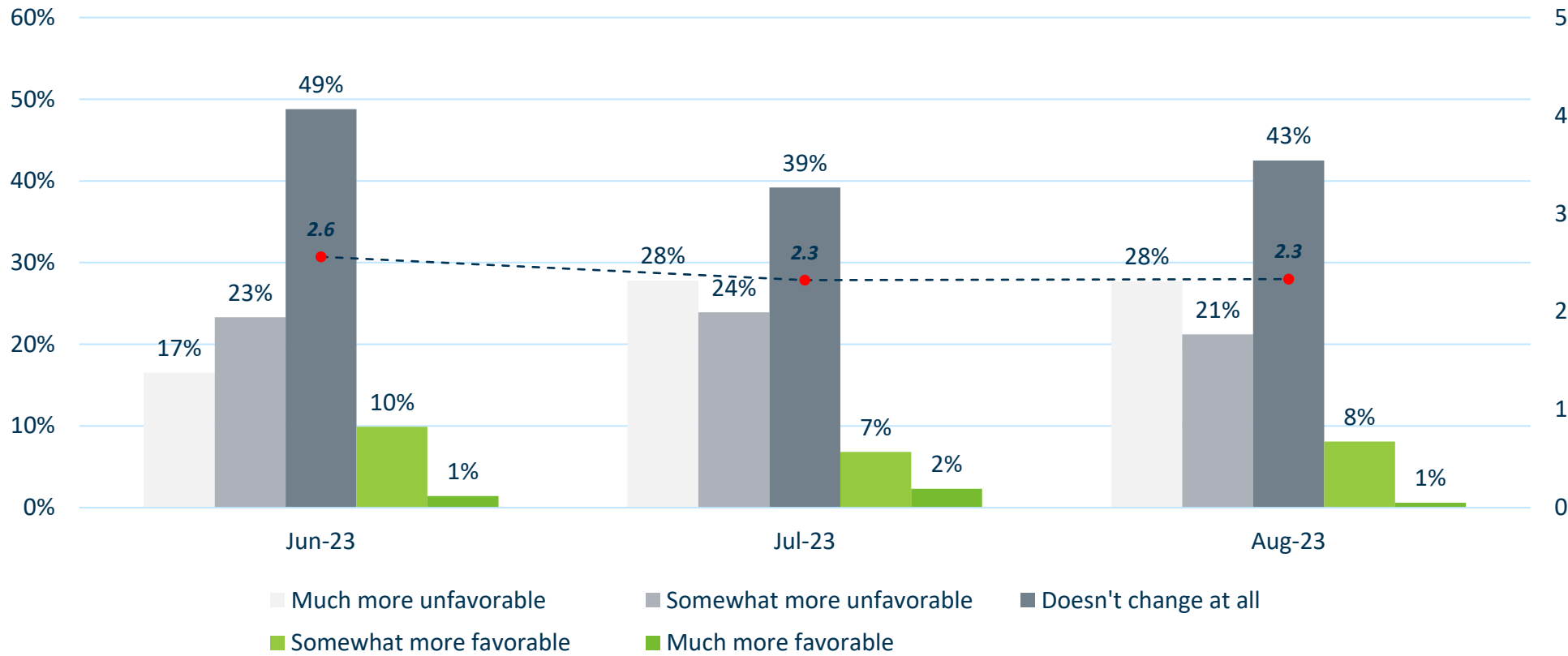




Change in Evergy Favorability due to Time-based Rates

Mean Score
YTD 2023 = 2.39

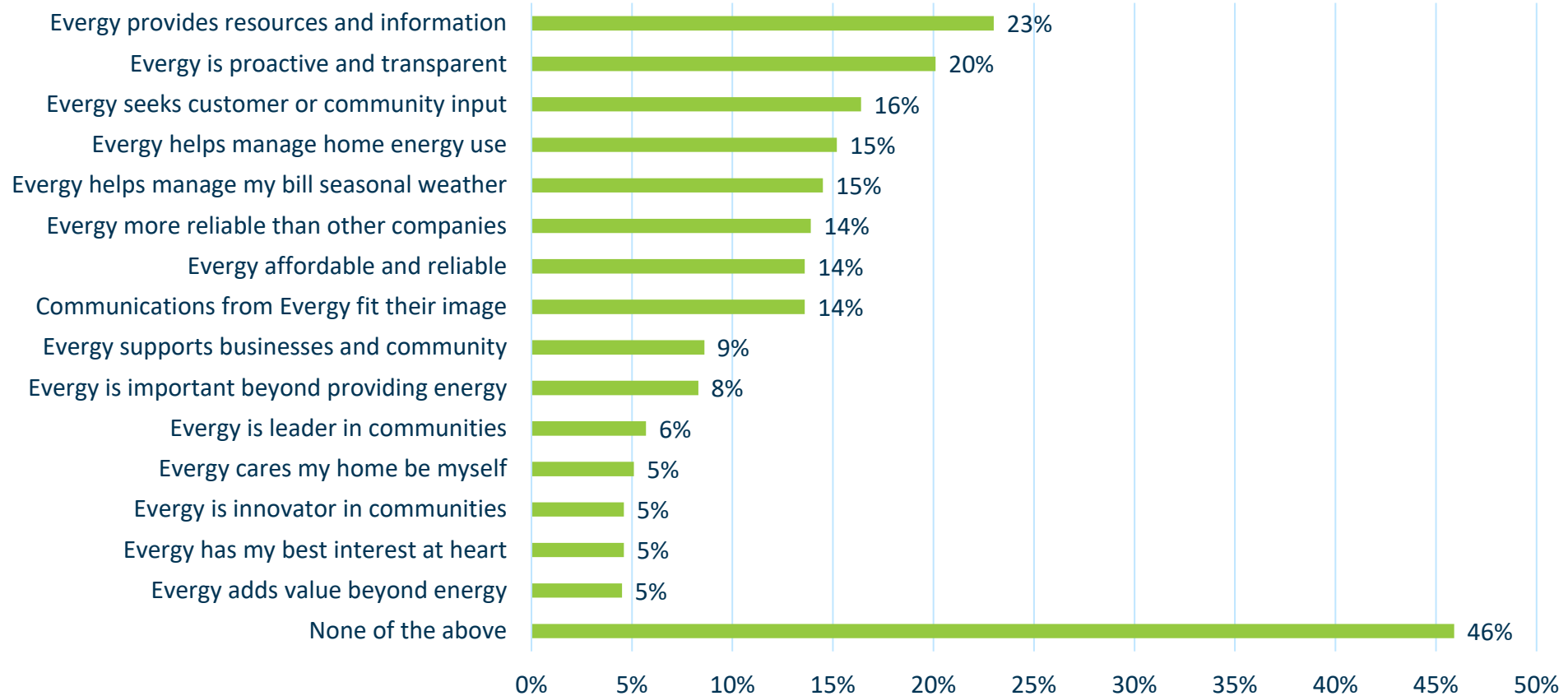
Change in Favorability due to Time-based Rates





Which Statements Apply to Evergy

Which Statement(s) Apply to Evergy



TOU Comment Examples from Facebook and Twitter

David [REDACTED]
Hey Evergy, EAT MY SHORTS! Raising our prices during peak hours (4-8) is like the gas stations doubling and tripling the price of gas immediately after 9/11. And you quadrupled the prices. It's called price gouging and those gas stations were prosecuted. You all need to be prosecuted too.

Like Reply Hide 6w

Christy [REDACTED]
Will Evergy be turning their air-conditioning off between the hours of 4-8 every weekday? Will the executives turn theirs off at the work and home? Why have it if I have to turn it off the only hours I am home? This is price gouging at it's best and should be illegal.

Like Reply Hide 6w

Kyle [REDACTED]
Call this what it really is- price gouging. Charge customers more so you can make more when people most need it. Working active families can't just shift times that are convenient for you. Should government start charging people to breathe during working hours? Should restaurants charge more if you eat during normal eating times? It could go on and on. It doesn't cost you more to create that same electricity during peak hours. That's a lie and a not so clever disguise at sticking it to the customer. The water running through the hydroelectric dams doesn't become more expensive suddenly between the hours of 4-8pm. Good grief. Just another squeeze on peoples' wallets.

Like Reply Hide 7w

Chris [REDACTED]
Please contact the Missouri Public Service Commission and the FTC to voice your opinion on this change! We don't have any other electric providers, so this is price gouging. The company should be building into their pricing the upgrades for infrastructure to adequately handle peak loads.

Like Reply Hide 7w

Debra [REDACTED]
Chris [REDACTED] ripping us all off

Like Reply Hide 7w

Brandi [redacted]
If everyone files a complaint with the Missouri public service commission we can get this voided for predatory price gouging!!!!!!!!!!!!

Like Reply Hide 7w

Finn [redacted]
June 28 · 🌐

Evergy Spokesperson Kelli Kolich explains the new time-based rate structure coming to Missouri Energy customers, "For customers, they will have the opportunity to select one of four rate plans that best suits their lifestyle and energy usage. Actually 70% of folks who do nothing at all, are actually going to see a cost savings on their bill," Kolich said.

THEY CANT EVEN COME UP WITH A SINGLE BENEFICIAL STATISTIC THAT MAKES SENSE. Only 70% of people WHO DO NOTHING AT ALL might see cost savings on their bill?? WHO THE [redacted] IS DOING NOTHING AT ALL AT THEIR HOUSE? HOW THE [redacted] DID THEY EVEN MAKE THIS [redacted] UP?

The new evergy TOU plans will [redacted] over so many people in this city. Everyone needs to get [redacted] ing mad about this.

This is price gouging. This is pure greed. This is a huge [redacted] you to so many demographics in Kansas City and all of Missouri.

Evergy be [redacted] ng ashamed of yourselves.

👍👎 5

Like Comment Share

Lucy [redacted]

Evergy, leave the rates and methods alone. You're drawing attention your overinflated and illicit price gouging. Sadly, you have swung the door open to politics in your search for power grid capitalism. So embarrassing!

Like Reply Hide 1w

[Redacted] @ [Redacted] · Aug 8

The plan change that @evergy power is doing should be illegal. They are purposely making homeowners accountable for deciding the best plan for them, so they some won't choose wisely and will overpay. This practice should be illegal. They have a monopoly.

5 4 16 1,736

Energy should cost what it costs. This is CLEARLY price gouging measure by evergy.

8:29 AM · Aug 8, 2023 · 228 Views

3 Likes

Barbara [Redacted]

Evergy is a price gouging company. Wants to triple our rates cause they need to pay their investors more! BS!

Like Reply Hide 4w 8

Catherine [Redacted]

Let's hit people that can barely squeak by... higher taxes, inflation, higher gas prices and now...Evergy wants their piece of the pie. This is unethical price gouging! And unfortunately, they have a monopoly!

Like Reply Hide 7w