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
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
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:

 Darrin R. Ives  
 Vice President – Regulatory Affairs  
 Evergy, Inc.  
 1200 Main Street  
 P.O. Box 418679  
 Kansas City, MO 64141-9679  
 (816) 556-2522  
 Darrin.Ives@evergy.com

 Anthony R. Westenkirchner  
 Senior Paralegal – Regulatory Affairs  
 Evergy, Inc.  
 1200 Main Street, 19th floor  
 Kansas City, MO 64105  
 (816) 556-2668  
 Anthony.Westenkirchner@evergy.com

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.
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.”\(^3\)

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\(^2\) 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. 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.

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, Kolkmeyer 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.

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.

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

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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

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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

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
Roger W. Steiner, MBN 39586
Evergy, Inc.
1200 Main Street
Kansas City, MO 64105
Phone: (816) 556-2791
Fax: (816) 556-2787
roger.steiner@evergy.com

James M. Fischer, MBN 27543
Fischer & Dority, P.C.
2081 Honeysuckle Lane
Jefferson City, MO 65109
Phone: (573) 353-8647
jfischerpc@aol.com

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

[Notary Seal]
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
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.

  o 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

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

<table>
<thead>
<tr>
<th>Month</th>
<th>Not at all / Not very satisfied</th>
<th>Somewhat satisfied</th>
<th>Very / Extremely satisfied</th>
</tr>
</thead>
<tbody>
<tr>
<td>June</td>
<td>6.8%</td>
<td>26.2%</td>
<td>67.0%</td>
</tr>
<tr>
<td>July</td>
<td>11.4%</td>
<td>36.5%</td>
<td>52.1%</td>
</tr>
<tr>
<td>August</td>
<td>13.9%</td>
<td>36.1%</td>
<td>50.0%</td>
</tr>
</tbody>
</table>
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

Exhibit A - Page 5 of 41
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?

- **June**: Yes, 31%; No, 69%
- **July**: Yes, 73%; No, 27%
- **August**: Yes, 90%; No, 10%
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?

June
- Yes, 47%
- No, 53%

July
- Yes, 65%
- No, 35%

August
- Yes, 80%
- No, 20%
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

June
- I know they exist but don’t know anything about them / I know a very little bit about them: 31.4%
- I know a little bit about them: 23.9%
- I know a good amount about them / I know a lot about them: 44.7%

July
- I know they exist but don’t know anything about them / I know a very little bit about them: 39.3%
- I know a little bit about them: 20.1%
- I know a good amount about them / I know a lot about them: 40.6%

August
- I know they exist but don’t know anything about them / I know a very little bit about them: 35.2%
- I know a little bit about them: 2.8%
- I know a good amount about them / I know a lot about them: 33.4%

Project 23-0013: Missouri Mandatory TOU_Q8 - How familiar are you 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.

- 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).

Customers not familiar with Evergy’s rate plans
Satisfaction with current rate plan is holding steady at “Somewhat Satisfied”

Satisfaction with current rate plan from Evergy

<table>
<thead>
<tr>
<th>Month</th>
<th>Not at all / Not Very satisfied</th>
<th>Somewhat satisfied</th>
<th>Very / Extremely satisfied</th>
</tr>
</thead>
<tbody>
<tr>
<td>June</td>
<td>3.2</td>
<td>52.6%</td>
<td>33.9%</td>
</tr>
<tr>
<td>July</td>
<td>3.1</td>
<td>50.3%</td>
<td>30.9%</td>
</tr>
<tr>
<td>August</td>
<td>3.0</td>
<td>52.3%</td>
<td>27.5%</td>
</tr>
</tbody>
</table>

Exhibit A - Page 11 of 41
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

- **June**
  - Yes, 45%
  - No, 55%

- **July**
  - Yes, 66%
  - No, 34%

- **August**
  - Yes, 76%
  - No, 24%

Exhibit A - Page 12 of 41
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)
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

- The number of customers who know nothing or very little (Bottom 2 Box knowledge) about time-based rates is significantly more among female customers vs. male (41% vs. 29% respectively).
Most customers know very little about the details of time-based rates but we have seen small increases in August.
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

<table>
<thead>
<tr>
<th></th>
<th>June</th>
<th>July</th>
<th>August</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>32%</td>
<td>38%</td>
<td>69%</td>
</tr>
<tr>
<td>No</td>
<td>68%</td>
<td>62%</td>
<td>31%</td>
</tr>
</tbody>
</table>

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

- **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).
### Awareness of time-based rate changes is significantly increasing

#### Changes to your Evergy electric service

<table>
<thead>
<tr>
<th>Option</th>
<th>June</th>
<th>July</th>
<th>August</th>
</tr>
</thead>
<tbody>
<tr>
<td>You now have the ability to choose from four new time-based rate plans to help save money and align with your personal budget, lifestyle and energy usage</td>
<td>21%</td>
<td>3%</td>
<td>51%</td>
</tr>
<tr>
<td>All Missouri customers will be required to be on a time-based rate by the end of the year</td>
<td>3%</td>
<td>51%</td>
<td>63%</td>
</tr>
<tr>
<td>If you don’t switch to a time-based rate plan you will automatically be enrolled in one</td>
<td>3%</td>
<td>3%</td>
<td>68%</td>
</tr>
<tr>
<td>Evergy is going paperless</td>
<td>15%</td>
<td>8%</td>
<td>8%</td>
</tr>
<tr>
<td>Evergy rates are going to increase</td>
<td>36%</td>
<td>50%</td>
<td>49%</td>
</tr>
<tr>
<td>Evergy rates are going to decrease</td>
<td>0%</td>
<td>1%</td>
<td>2%</td>
</tr>
<tr>
<td>Evergy is providing rate plans to help fit your lifestyle</td>
<td>28%</td>
<td>22%</td>
<td>30%</td>
</tr>
<tr>
<td>Evergy is providing rate plans to help fit how you use electricity and to save you money</td>
<td>28%</td>
<td>38%</td>
<td>35%</td>
</tr>
<tr>
<td>Other (please specify)</td>
<td>3%</td>
<td>3%</td>
<td>8%</td>
</tr>
<tr>
<td>None of the above</td>
<td>22%</td>
<td>8%</td>
<td>3%</td>
</tr>
</tbody>
</table>

Exhibit A - Page 19 of 41
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

June: No 76%, Yes 24%
July: No 40%, Yes 60%
August: No 26%, Yes 74%
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 varying 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)
Reasons you believe Evergy is switching customers to a time-based rates
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.

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

- Not at all / Not very appealing
- Somewhat appealing
- Very / Extremely appealing

June: 26.4% Not at all / Not very appealing, 43.9% Somewhat appealing, 23.0% Very / Extremely appealing
July: 30.7% Not at all / Not very appealing, 39.2% Somewhat appealing, 19.6% Very / Extremely appealing
August: 39.5% Not at all / Not very appealing, 21.3% Somewhat appealing, 42.6% Very / Extremely appealing

Exhibit A - Page 24 of 41
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.

- 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).
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).
Current Rate Plan

Selected or Assigned Current Rate Plan

- Jun-23: 71% Did not choose, 29% Selected a plan
- Jul-23: 75% Did not choose, 25% Selected a plan
- Aug-23: 69% Did not choose, 31% Selected a plan

Exhibit A - Page 29 of 41
What electric rate plan did you choose?

- Time-based: 39%, 18%, 12%
- Standard: 39%, 26%, 12%
- Tier: 3%, 1%, 0%
- EV Rate: 2%, 1%, 0%
- Solar: 3%, 3%, 1%
- Green: 1%, 1%, 0%
- Other: 14%, 12%, 12%
- Don't know: 11%, 11%, 11%
Project 23-0013: Missouri Mandatory TOU_Q11) (IF Q9 = I did not choose a rate plan) Do you know what electric rate plan you are on?
Where Heard about These Changes

Where Heard about These Changes (If recall)

- Email from Evergy: 59%
- Mail from Evergy: 30%
- Online/social media: 21%
- Television: 19%
- Insert in bill: 19%
- Outdoor: 13%
- Radio: 4%
- In-person event: 0%
- Other: 5%
- Don't know: 2%

Aug-23

Exhibit A - Page 32 of 41
What Concerns about Switching to Time-based Rate Plan

What concerns, if any, do you have about switching to a rate plan where the costs of electricity will vary based on the time of day that you use it?

- 73% My bill will go up
- 45% Need electricity during peak hours
- 42% Can't use electricity when I need to
- 37% I don't know enough I will pick the wrong plan
- 30% Businesses more expensive
- 25% Other
- 8%

Aug-23
How Easy to Make Changes to Fit Rate Plan

Project 23-0013: Missouri Mandatory TOU_Q28) How easy will it be for you to make changes to your electric usage to fit with your new rate plan?

Mean Score
YTD 2023 = 2.32
How Much will Save

Project 23-0013: Missouri Mandatory TOU_Q30) (IF Q29 = Yes) How much money do you think you will save? (1 = Very little; 5 = A lot)

Mean Score
YTD 2023 = 2.65

How Much Will You Save

- A little (1-2)
- Some (3)
- A lot (4-5)

Exhibit A - Page 36 of 41
Project 23-0013: Missouri Mandatory TOU Q31) Did you know that Evergy is providing tools on their website which you can use to understand your electricity usage to help you choose the time-based rate plan which is best for you?

**Aware of Tools on Evergy Website**

- **June 2023**: 81% aware, 19% not aware
- **July 2023**: 68% aware, 32% not aware
- **August 2023**: 48% aware, 52% not aware

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**Exhibit A - Page 37 of 41**
Visited Evergy Website and Used Tools

Visited Evergy Website and Used Tools (if aware)

- Jun-23: 59% No, 41% Yes
- Jul-23: 52% No, 48% Yes
- Aug-23: 36% No, 64% Yes

Project 23-0013: Missouri Mandatory TOU_Q32) (IF Q31 = Yes) Have you visited the Evergy website and used any of these tools?
Project 23-0013: Missouri Mandatory TOU_Q33) How does switching to a rate plan where the costs of electricity will vary based on the time of day that you use it change your opinions of Evergy?
### Which Statement(s) Apply to Evergy

<table>
<thead>
<tr>
<th>Statement</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Evergy provides resources and information</td>
<td>23%</td>
</tr>
<tr>
<td>Evergy is proactive and transparent</td>
<td>20%</td>
</tr>
<tr>
<td>Evergy seeks customer or community input</td>
<td>16%</td>
</tr>
<tr>
<td>Evergy helps manage home energy use</td>
<td>15%</td>
</tr>
<tr>
<td>Evergy helps manage my bill seasonal weather</td>
<td>15%</td>
</tr>
<tr>
<td>Evergy more reliable than other companies</td>
<td>14%</td>
</tr>
<tr>
<td>Evergy affordable and reliable</td>
<td>14%</td>
</tr>
<tr>
<td>Communications from Evergy fit their image</td>
<td>14%</td>
</tr>
<tr>
<td>Evergy supports businesses and community</td>
<td>9%</td>
</tr>
<tr>
<td>Evergy is important beyond providing energy</td>
<td>8%</td>
</tr>
<tr>
<td>Evergy is leader in communities</td>
<td>6%</td>
</tr>
<tr>
<td>Evergy cares my home be myself</td>
<td>5%</td>
</tr>
<tr>
<td>Evergy is innovator in communities</td>
<td>5%</td>
</tr>
<tr>
<td>Evergy has my best interest at heart</td>
<td>5%</td>
</tr>
<tr>
<td>Evergy helps manage my bill seasonal weather</td>
<td>5%</td>
</tr>
<tr>
<td>Evergy seeks customer or community input</td>
<td>5%</td>
</tr>
<tr>
<td>Evergy adds value beyond energy</td>
<td>5%</td>
</tr>
<tr>
<td>None of the above</td>
<td>46%</td>
</tr>
</tbody>
</table>
TOU Comment Examples from Facebook and Twitter

David
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.

Christy
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.

Kyle
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.

Chris
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.

Debora
Chris ripping us all off.

Exhibit B
Page 1 of 3
Brandi
If everyone files a complaint with the Missouri public service commission we can get this voided for predatory price gouging!!!!!!!!!

Lucy __
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!
The plan change that @everypower 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.

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

Like · Reply · Hide · 4w

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

Like · Reply · Hide · 7w