

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

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

**RESPONSE TO ORDER**

COMES NOW, Evergy Metro, Inc. d/b/a as Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) (collectively, “Evergy” or the “Company”) and, for their *Motion for Clarification* (“Motion”), state as follows:

1. On August 30, 2023, the Missouri Public Service Commission (“Commission”) issued its *Order Directing Time-of-Use Customer Choice Transition Reporting* (“Order”) requesting additional information reporting from the Company, as detailed below. As explained below, the Company believes it can produce the majority of the information requested but some of it will be in a different format or interval as detailed below, and therefore requests clarification/modification of the order.

| Report/Data  | Status                   | Additional Information                                      |
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| <b>TOU Campaign Dashboard / Enrollment Summary:</b> Rate Plan / Jurisdiction / Total   | Will continue to provide | Company will provide by the 10 <sup>th</sup> of each month. |
| <b>TOU Campaign Dashboard / Customer Awareness:</b><br><ul style="list-style-type: none"> <li>● Awareness of Mandatory TOU Change</li> <li>● Number of TOU Pre-Selection</li> <li>● Number of Landing Page Sessions</li> </ul> | Will continue to provide | Company will provide by the 10 <sup>th</sup> of each month. |

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| <p><b>TOU Campaign Dashboard / Online Enrollments:</b></p> <ul style="list-style-type: none"> <li>• % of all Enrollments completed online</li> <li>• % completed through Evergy Contact Center or Connect</li> </ul>   | <p>Will continue to provide</p> | <p>Company will provide by the 10<sup>th</sup> of each month.</p>   |
| <p><b>TOU Campaign Dashboard / Contact Center Engagements:</b> Number of calls offered and average length of TOU calls</p>   | <p>Will continue to provide</p> | <p>Company will provide by the 10<sup>th</sup> of each month.</p>   |
| <p><b>TOU Campaign Dashboard/ Enrollment Summary</b> by certain customer segmentations to include but not be limited to Electric Heat Customers, Non-Digital Customers, Senior Customers, Rural Customers, Low Income Customers and Less Energy Engaged Customers</p>      | <p>Will provide</p>             | <p>Company will provide by the 10<sup>th</sup> of each month.</p>   |
| <p><b>Marketing Channel Results / Channel Performance</b></p>  | <p>Will continue to provide</p> | <p>Company will provide by the 10<sup>th</sup> of each month.</p>   |
| <p><b>Customer Engagement &amp; Sentiment</b></p> <ul style="list-style-type: none"> <li>• Compare My Rate Online Tool</li> <li>• Enrollments, Contact Center &amp; Feedback</li> <li>• Online Customer Survey Findings</li> <li>• Number of customers surveyed</li> </ul> | <p>Will provide</p>             | <p>Company will provide by the 10<sup>th</sup> of each month.</p>   |
| <p><b>Monitor Feedback and Adapt Communications:</b></p> <p>b. Copies of all customer facing media communications including start/stop dates</p>   | <p>Will continue to provide</p> | <p>The Company will continue to provide customer education materials with dates that material went into market. This will be provided by the 10<sup>th</sup> of each month.</p> |

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| <p><b>Monitor Feedback and Adapt Communications:</b></p> <p>c. Describe the communications plan and specific outreach provided to particular customer types and detail how those strategies have been modified during the reporting period. Particular customer types refers to the “Special Customer Groups” and “Hard-to-Reach” Customer Segments, as described in Evergy’s Time of Use Workshop 2 slides presented on May 23, 2023 (page 33) as well as those identified to be more likely to be adversely impacted including:</p> <ul style="list-style-type: none"> <li>● Low Income Customers</li> <li>● Senior Customers</li> <li>● “Hard-to-Reach” customers including <ul style="list-style-type: none"> <li>1. Rural Customers</li> <li>2. Non-digital Customers</li> <li>3. Less Energy Engaged</li> </ul> </li> <li>● Electric Space Heat Customers</li> <li>● Net Metered Customers</li> <li>● Customers currently enrolled in the Average Pay Plan</li> <li>● Customers currently enrolled in any other payment arrangement plan</li> </ul> | <p>Will provide</p>                              | <p>Company will provide by the 10<sup>th</sup> of each month.</p>   |
| <p><b>Monitor Feedback and Adapt Communications:</b></p> <p>d. If applicable, any modifications that Evergy implemented to communications and messaging specifically based on customer feedback</p>   | <p>Will provide</p>                              | <p>Company will provide by the 10<sup>th</sup> of each month.</p>   |
| <p><b>Campaign Measurement / Internal Monthly Survey results</b></p>  | <p>Will continue to provide</p>                  | <p>Company will provide by the 10<sup>th</sup> of each month.</p>   |
| <p><b>Customer Data:</b> d. List of accounts that switch more than once a year, including the frequency or switches if more than one.</p>   | <p>Company can provide in a different format</p> | <p>The Company can provide a summary level count of how many accounts are switching rates multiple times. The Company will provide quarterly as directed.</p> |
| <p><b>Campaign Measurement / Third-Party Survey results</b></p>   | <p>Will provide</p>                              | <p>Company will provide quarterly as directed.</p>  |

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| <p><b>TOU Campaign Dashboard/ Contact Center Engagements:</b> Customer Complaints: Resolution type for each call. <i>Example categories include but are not limited to:</i></p> <ul style="list-style-type: none"> <li>• <i>premature disconnection by customer</i></li> <li>• <i>premature termination by company</i></li> <li>• <i>customer selection to utilize IVA assistance</i></li> <li>• <i>customer election to utilize the call-back feature</i></li> <li>• <i>transfer to TOU CSR for education</i></li> <li>• <i>transfer to TOU CSR for rate coaching</i></li> <li>• <i>transfer to TOU CSR to change plan</i></li> <li>• <i>escalation to Resolution Team member</i></li> <li>• <i>transfer to receive billing assistance</i></li> <li>• <i>transfer or referral to receive information regarding energy efficiency programs or demand response program enrollment</i></li> <li>• <i>transfer or referral to receive energy efficiency financing program</i></li> <li>• <i>referral to a community service provider</i></li> <li>• <i>referral to a specific Community Action Agency</i></li> <li>• <i>referral to a state agency to determine eligibility to receive energy assistance or weatherization services</i></li> <li>• <i>referral to the Public Service Commission</i></li> </ul> | <p>Company does not have this level of detail. Company can provide alternative data.</p> | <p>This level of detail requested by the Commission is not tracked in the Company’s contact center. The Company can provide similar intelligent virtual assistance (“IVA”) utilization information as shared quarterly with MPSC Staff.</p> <p>However, this general information would be for all callers, not specific to complaints or TOU calls.</p> <p>The Company can also provide some summary information related to calls to the escalation desk, however, it would not include resolution.</p> <p>As part of this ask, the Company will provide a report showing comments noted by CSR conversations with customers related to TOU calls.</p> |
| <p><b>Monitor Feedback and Adapt Communications:</b><br/>a. Weekly Spending booked in deferral Account</p>  | <p>Data currently provided quarterly</p>   | <p>This Commission request for data is currently provided quarterly in dockets ER-2022-0129 and ER2022-0130</p> <p>The Company requests that it continue to be provided at this frequency due to the inability to report spend weekly. Vendors bill the Company monthly, and the accounting practices which applies the costs to the appropriate deferral accounts occur monthly as well. Due to the inability to report weekly and the labor-intensive nature of anything more frequent than quarterly, it is important the Company continue the current reporting cadence.</p>   |
| <p><b>Customer Data:</b> a. Total usage per rate plan by week.</p>  | <p>Company can provide alternate data</p>  | <p>The Company only has summarized usage by rate plan by month. Usage by week is not an option as the Company does not bill weekly.</p>  |

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| <p><b>Customer Data:</b> b. Cumulative frequency of total usage by month and bill cycle for each rate plan</p>  | <p>Company can provide alternative data</p>           | <p>The Company does not currently have summarized usage by rate plan and bill cycle. The Company can provide summarized usage by rate plan by month. Creating new data sets to provide the additional detail will require a significant effort to provide and will require the Company to acquire additional resources to manage. Any usage data shared in this docket will be provided marked as confidential. The Company can provide quarterly as directed.</p> |
| <p><b>Average Payment Plan:</b></p> <ul style="list-style-type: none"> <li>• The number of customers that were removed from the APP each month because they enrolled in a new rate option using self-service.</li> <li>• The number of customers that called in to make a payment arrangement to avoid paying the large balance owed.</li> <li>• Total number of calls/customer contacts regarding the removal of APP and new enrollments.</li> <li>• Total number of re-enrollments in APP after the new TOU rates are effective – provide a monthly update of the information beginning with information from the month of October 2023.</li> </ul> | <p>Company can provide an alternative set of data</p> | <p>The Company will provide the percentage of customers on APP on non-TOU rates and percentage on TOU rates on a quarterly basis as directed. The Company does not track calls to this level of detail to provide call counts.</p>   |
| <p><b>Customer Data:</b> c. Cumulative frequency of total usage by time period and by month and bill cycle for each rate plan</p>   | <p>Company does not aggregate data at this level</p>  | <p>The Company does not currently have summarized usage by rate plan, bill cycle and time period. Creating new data sets to provide the additional detail will require a significant effort to provide and will require the Company to acquire additional resources to manage.</p>   |

WHEREFORE, The Company submits its Response for consideration by the Commission.

Respectfully submitted,

*/s/ Roger W. Steiner*

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Roger W. Steiner, MBN 39586  
Phone: (816) 556-2314  
E-mail: [roger.steiner@evergy.com](mailto:roger.steiner@evergy.com)  
Evergy, Inc.  
1200 Main – 16<sup>th</sup> Floor  
Kansas City, Missouri 64105  
Fax: (816) 556-2110

James M. Fischer, MBN 27543  
Fischer & Dority, P.C.  
101 Madison Street, Suite 400  
Jefferson City, MO 65101  
Phone: (573) 636-6758 ext. 1  
Fax: (573) 636-0383  
[jfischerpc@aol.com](mailto:jfischerpc@aol.com)

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

**CERTIFICATE OF SERVICE**

I hereby certify that a true and copy of the foregoing was emailed on this 29<sup>th</sup> day of September 2023 to counsel for all parties.

*/s/ Roger W. Steiner*

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Roger W. Steiner