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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: EO-2024-0002

DIRECT TESTIMONY

OF

BRADLEY D. LUTZ

ON BEHALF OF

EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST

Kansas City, Missouri
November 2023

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DIRECT TESTIMONY

OF

BRADLEY D. LUTZ

Case No. EO-2024-0002

Q: Please state your name and business address.

A: My name is Bradley D. Lutz. My business address is 1200 Main, Kansas City, Missouri 64105.

Q: By whom and in what capacity are you employed?

A: I am employed by Evergy Metro, Inc. I serve as Director, Regulatory Affairs for Evergy Metro, Inc. d/b/a as Evergy Missouri Metro ("Evergy Missouri Metro"), Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West"), Evergy Metro, Inc. d/b/a Evergy Kansas Metro ("Evergy Kansas Metro"), and Evergy Kansas Central, Inc. and Evergy South, Inc., collectively d/b/a as Evergy Kansas Central ("Evergy Kansas Central") the operating utilities of Evergy, Inc.

Q: On whose behalf are you testifying?

A: I am testifying on behalf of Evergy Missouri Metro and Evergy Missouri West (collectively, the "Company" or "Evergy").

Q: What are your responsibilities?

A: My current responsibilities are focused on rates, regulatory operations and customer issues, providing support and oversight for a wide range of regulatory work including determination of retail revenues, load analysis, rate design, class cost of service, tariff administration, compliance reporting, response to customer complaints, docket management system administration, general tariff administration, and relationship

development for the Company's regulatory activities in the Missouri and Kansas jurisdictions.

Q: Please describe your education, experience and employment history.

A: I hold a Master of Business Administration from Northwest Missouri State University and a Bachelor of Science degree in Engineering Technology from Missouri Western State University.

I joined Evergy, then Kansas City Power & Light, in August 2002 as an Auditor in the Audit Services Department. I moved to the Company's Regulatory Affairs group in September 2005 as a Regulatory Analyst where my primary responsibilities included support of our rate design and class cost of service efforts. I was promoted to Manager in November 2010 and was promoted to my current position in March 2020.

Prior to joining Evergy, I was employed by the St. Joseph Frontier Casino for two years as Information Technology Manager. Prior to St. Joseph Frontier Casino, I was employed by St. Joseph Light and Power Company for nearly 14 years. I held various technical positions at St. Joseph Light and Power Company, including Engineering Technician-Distribution, Automated Mapping/Facilities Management Coordinator, and my final position as Senior Client Support Specialist-Information Technology.

Q: Have you previously testified in a proceeding before the Missouri Public Service Commission ("Commission" or "MPSC") or before any other utility regulatory agency?

A: Yes, I have testified multiple times before the Commission concerning tariff, class cost of service and rate design topics as part of various recent proceedings. Additionally, I have testified multiple times before the Kansas Corporation Commission.

Q: What is the purpose of your testimony?

A: I will address the following topics in my testimony:

I. The Data Retention Commitment

II. Company Position concerning the data requested

I. THE DATA RETENTION COMMITMENT

Q: Please explain the Data Retention Commitment driving this case.

A: As part of Stipulation and Agreement reached and approved in its last general rate proceeding under case No. ER-2022-0129/0130 ("0129/0130 Stipulation"), Evergy agreed to:

> Prior to July 1, 2023, the Company will identify and provide the data requested in the direct testimony of Sarah Lange. If the requested data is not available or cost-prohibitive to produce, the Company will file a motion to establish an EO docket. In that docket the Company will provide the reason why it cannot provide the requested data and its individual estimate of the cost to provide each set of requested data, for the further consideration of the parties and the Commission.
>
> 1. Identify and provide the data required to determine: line transformer costs and expenses by rate code; primary distribution costs and expenses by voltage; secondary distribution costs and expenses by voltage; primary voltage service drop costs and expenses; line extension costs, expenses, and contributions by rate code and voltage; and meter costs by voltage and rate code;.
>
> 2. For each rate code, provide the total number of customers served on that rate schedule on the first day of the month and the last day of the month;
>
>   a. For each rate schedule on which customers may take service at various voltages, the number of customers served at each voltage on the first day of the month and the last day of the month;
>
> 3. For each rate code, the number of customers served on that rate schedule on the first day of the month and the last day of the month for which interval meter readings are obtained;

a. For each rate code on which customers may take service at various voltages, the number of customers served at each voltage on the first day of the month and the last day of the month which interval meter readings are obtained;

4. For each rate code for which service is available at a single voltage, the sum of customers' interval meter readings, by interval;

a. For each rate code on which customers may take service at various voltages, the sum of customers' interval meter readings, by interval and by voltage;

5. If any internal adjustments to customer interval data are necessary for the company's billing system to bill the interval data referenced in parts 4. and 4.a., such adjustments should be applied to each interval recording prior to the customers' data being summed for each interval;

6. From time to time the Commission may designate certain customer subsets for more granular study. If such designations have been made, the information required under parts 1 – 5 should be provided or retained for those instances.

7. Individual customer interval data shall be retained for a minimum of fourteen months. If individual data is acquired by the Company in intervals of less than one hour in duration, such data shall be retained in intervals of no less than one hour.

8. Evergy shall:

a. Retain individual hourly data for use in providing bill comparison tools for customers to compare rate alternatives.

b. Retain coincident peak determinants for use in future rate proceedings.

c. Provide to Staff upon request:

1) the information described in part 1;

2) a minimum of 12 months of the data described in parts 2-5;

3) for rate codes with more than 100 customers, a sample of individual customer hourly data, and identified peak demands for those 100 customers in the form requested at that time (i.e. monthly 15 minute non-coincident, annual 1 hour coincident);

4) for rate codes with 100 or fewer customers, individual customer hourly data, and identified peak demands for those customers in the form requested at that time (i.e. monthly 15 minute non-coincident, annual 1 hour coincident).

d. For purposes of general rate proceedings, Evergy shall provide all data described above for a period of not less than 36 months, except that Staff does not request individual customer data for 36 months except as described in part 8.c.3.

9. Develop the determinants for assessment of an on-peak demand charge to replace the current monthly billing demand charge, and for potential implementation for customers not currently subject to a demand charge; and

10. EMM and EMW begin to retain and study data related to the reactive demand requirements of each rate code, and sample customers within each rate code.[1]

Q: Was the Company able to provide the data requested by the established date?

A: No.

Q: Did the Company determine the data is not available or cost-prohibitive to produce?

A: Yes.

Q: Did the Company file a motion to establish an EO docket prior to July 1, 2023, as indicated in the Stipulation and Agreement?

A: Yes.

Q: Is the Direct Testimony offered in this EO docket intended to provide the reason why the Company cannot provide the requested data and the Company's individual estimate of the cost to provide each set of requested data, for the further consideration of the parties and the Commission?

A: Yes.

[1] See, p. 12, ER-2022-0129/0130 Stipulation and Agreement, filed August 30, 2022.

Q: What is the structure of the Company testimony?

A: The Company offers the testimony of three witnesses to address this commitment. In addition to my testimony, described earlier, the Company offers the testimony of,

- Julie Dragoo, Senior Director of Strategy and Support – explaining the Company systems, detailing the data relationships and providing further support for the cost estimates detailed in my testimony. She has responsibility for many of the Company systems related to these data retention requests.
- Sean Riley, Partner with PricewaterhouseCoopers LLP ("PwC") - offering insights into industry practices and confirmation that Evergy is following normal practice with its systems and data management. He also offers reaction to select Staff data retention requests.

Q: Please describe why the Company was unable to provide the requested data and provide an individual estimate of the cost to provide each set of requested data.

A: The issues varied across the data requests. Given the complexity and detail of the data requested, the Company has prepared a summary table of the assessment, provided as **Confidential Exhibit BDL-1**, detailing the respective requests, providing a response for each concerning the,

- Availability - Is the requested data present in the Company systems?
- Deliverability - Can the data be extracted and processed/formatted in a manner consistent with the request?
- Estimated Cost to provide - the cost to produce the data in the format, interval, and other criteria set within the request as specified by the Company through analysis of the request.

- Applicable Notes - additional information informative to the assessment.

To aid in examination of the assessment, the Company has used traffic signal coloring to represent the relative comparisons.

Q: Please describe the process used to evaluate the data and produce the summary assessment.

A: The assessment summary table was prepared to capture the efforts of a team of Company subject matter experts to provide the data. Given the breadth of data being requested, a cross functional team was assembled to respond to the availability of the requested data. The team included representatives of Evergy's Customer Operations, Customer Analytics, Customer Systems, Application Systems, Property Accounting, Geographic Information Services Support, Engineering & Analytics, Support Services Departments. This team included individuals with direct administrative and operational knowledge of Company Billing, Mapping, Work Management, Plant Accounting, and Meter Data Management systems. These individuals have direct experience with managing the data within the systems.

Some individuals on the team have been involved with this work since the first data requests were received from Staff with the complete team beginning formal work in September 2022 shortly after the 0129/0130 Stipulation was filed. Work to provide the data requested continued until June 2023 when it was clear that that the data would not be provided by the July 1 target date. Work then focused on the EO case and documenting the data availability and deliverability.

Q: The cost estimates are offered in ranges of cost. Why is this necessary?

A: In general, the cost to configure or customize computer systems can vary dramatically. Precise estimates require detailed specifications to account for all required modifications. Absent these specifications, there is variability in the final cost results. With the summary table the Company provides informative cost estimates to facilitate examination in this docket, but asserts that precision is not possible at this stage. Company witnesses Julie Dragoo and Sean Riley further make this assertion in their respective testimonies.

Q: Is it possible to summarize why was the Company was unable to provide the data as requested?

A: Yes. In general, the data requested from Staff is either new data or new combinations of data not normally retained by the Company or existing data requested in a form not normally maintained or exported by the Company. The Company systems are designed to accumulate, process, and retain data for the purpose of producing customer bills, managing Company work, and maintaining Company books and records. These systems are designed to perform limited data analytics and export, mainly in direct support of the primary system purpose.

The Staff requests are also problematic because much of the data requested would require combining data from distinct systems that aren't integrated in a manner to facilitate reporting/extraction on a combined basis- i.e., reporting or query capability isn't readily available that pulls data from all of these systems simultaneously and needed common characteristic to establish these linkages are not in place. It was also noted that the systems often "feed" into other systems in one direction, therefore edits and adjustments in one

system are not populated backwards to the source systems, resulting in differences in the data.

Q: Building on this response, are there specific details that would be helpful for the Commission to understand?

A: Yes. I want to be clear that these systems are not deficient in their design or inadequate to support Company operations or even to support historic ratemaking methods. The bulk of the data requested is associated with new concepts being promoted by Staff and do not align with these system purposes or with historic ratemaking.

Another important detail is that consideration of these data requests occurred during the time constraints of discovery in the Company rate cases or during a time when Company resources were committed to implementing the Commission's Order concerning deployment of mandatory Time of Use rates. In both cases, limited availability of time has impacted the Company response to these requests.

Q: The summary table includes significant information about the Company's assessment of the data requested. Is there additional information or context for the Commission to consider on any of the items?

A: Yes. I believe it would be helpful to highlight a number of the items. Specifically, I would like to further comment on data requests 1, 5, 6 and 8.

Q: What are your comments on data request 1?

A: Data request 1 is the most problematic of all the data requested. Staff requests:

> 1. Identify and provide the data required to determine: line transformer costs and expenses by rate code; primary distribution costs and expenses by voltage; secondary distribution costs and expenses by voltage; primary voltage service drop costs and expenses; line extension costs, expenses, and contributions by rate code and voltage; and meter costs by voltage and rate code;

Data does not exist in these combinations within the Company's systems to support this request. Where some part of the cost data exists, it is not linked to customer accounts, rate codes, or readily identified by voltage. Some of the elements of the request are not supported within the Company's accounting practices. The testimony of Julie Dragoo and Sean Riley explores this concern as well.

Q: If ordered, could the Company take the steps needed to produce the data requested?

A: Yes, but the effort would be significant. To establish a reliable and repeatable process to support this data basic Company processes and accounting treatments would need to be reworked. Application systems would need to be modified. New interfaces and linkages between systems would need to be designed and implemented. Following this project level work scope are estimated to cost in excess of ** [redacted] **.

Q: In your opinion, is the request for data identified in data request 1 appropriate?

A: No. If additional detail about these costs is deemed necessary, I believe alternate data be considered.

Q: What are your comments on data request 5?

A: This request is problematic, not because the source systems do not have the updated and billed data information, but because the Data Hub was not built to be a replica of our business source systems. The requests states,

> 5. If any internal adjustments to customer interval data are necessary for the company's billing system to bill the interval data referenced in parts 4. and 4.a., such adjustments should be applied to each interval recording prior to the customers' data being summed for each interval;

Data request 5 is not requesting specific data, but instead seeks to require updates to original interval data if adjustments are made in systems using the data later in the process. More specifically, this request sets an expectation for alignment between the Data

Hub and the MDM/CCB systems. As addressed in more detail by Company witness, Julie Dragoo, the Data Hub is the Company source for data extraction, similar to the requests raised by Staff in this proceeding. Systems such as CCB and MDM feed data to the Data Hub which is used to aggregate and analyze point in time data. To achieve alignment, significant process change would be needed to continually feed updates to the Data Hub, in a sense fully replicating the data. This form of interface does not exist and was never the intended use for Data Hub. Considerable enhancement would be required to both systems to enable it going forward. This concern does not account for the processing overhead associated with maintaining a live connection between systems.

Q: If ordered, could the Company change work processes and systems to achieve this adjustment?

A: It is uncertain, but again, the effort would be significant. If the Staff request for alignment between the data retained in separate systems is ordered, the Company will have to seek a fundamental redesign of its data retention logic to achieve this level of relationship. Further, work processes would need to change to address the resulting size and complexity of the Data Hub. An additional element of concern would be the potential impact of this logic change on our corporate infrastructure. It is possible that these levels of alignment will require additional enhancement and expansion to incorporate this new demand within other existing business needs. Due to the expected extensive modification and controls needed to ensure data consistency the Company estimated this effort would cost in excess of **[redacted]**.

Q: What are your comments on data request 6?

A: Staff's request is unworkable because the request is undefined and places an unrealistic expectation on the Company. The request states,

> *6. From time to time the Commission may designate certain customer subsets for more granular study. If such designations have been made, the information required under parts 1 – 5 should be provided or retained for those instances.*

The request lacks the detail needed to properly evaluate within this case. The second sentence identifying part 1 – 5 as the information to be provided does not clarify the purpose of the request.

Q: Since this data request is undefined, is this why the Company did not provide a cost estimate for this item?

A: Yes. Data request 6 is a speculative request. The individual responses to data requests 1 through 5 provide information about the costs to provide. Nothing more could be added for data request 6 at this time.

Q: What are your comments on data request 8?

A: Staff's request 8 is a multi-part request, mainly focused on data retention. The data request states:

> *8. Evergy shall:*
>
> *a. Retain individual hourly data for use in providing bill comparison tools for customers to compare rate alternatives.*
>
> *b. Retain coincident peak determinants for use in future rate proceedings.*
>
> *c. Provide to Staff upon request:*
>
> *1) the information described in part 1;*

2) a minimum of 12 months of the data described in parts 2-5;

3) for rate codes with more than 100 customers, a sample of individual customer hourly data, and identified peak demands for those 100 customers in the form requested at that time (i.e. monthly 15 minute non-coincident, annual 1 hour coincident);

4) for rate codes with 100 or fewer customers, individual customer hourly data, and identified peak demands for those customers in the form requested at that time (i.e. monthly 15 minute non-coincident, annual 1 hour coincident).

d. For purposes of general rate proceedings, Evergy shall provide all data described above for a period of not less than 36 months, except that Staff does not request individual customer data for 36 months except as described in part 8.c.3.

The Company concerns vary for the respective parts, but in general are centered around concerns about deliverability. For part a, the Company currently provides residential rate comparison tools via a third-party application. This capability is supplemented with customer-initiated data access via Green Button functionality. This capability is not available to non-residential customers due to the higher complexity of rates. For parts b, and d the data requested is retained by the Company, but depending on how the data is requested, the form of delivery can produce additional concerns. For item c, these refer to items to be provided "upon request." The Company environment does not easily support dynamic data requests, particularly if the data is expected to be tied to other data sources for rate making purposes. Again, depending on the form of the request, data that is available can be a challenge to produce. Preplanning, regular output formats and timing requirements can alleviate many of these challenges.

Q: The summary table represents that several items exist or are retained but have issues with the deliverability. Why is this?

A: Several of the Staff data requests are for data used in our regular billing processes, so these are data which is available. However, there are elements in each that require work to execute. For example, in most cases these data extractions are not part of current processes. The queries would need to be created and processes established to execute the extractions as part of regular computer systems operations.

Q: Are there any other factors impacting the Company's ability to provide this data?

A: Yes. It should be noted that the Company relies on the same personnel and the same computer environments to perform daily operations as it does to support regulatory and ratemaking needs. In its normal course of business, the Company must allocate time between these needs, often setting aside customer related work to support regulatory demands. These additional data requests from Staff add to that pressure. It is particularly difficult because many of the data requests are outside of our normal business operations and require special, one-off efforts to produce.

II. THE COMPANY POSITION CONCERNING THE DATA REQUESTED

Q: In your opinion, why has this data has been requested by the Staff?

A: Staff is under the opinion that current cost allocation methods are insufficient to support ratemaking, mainly in differentiating distribution plant costs by voltage. Further, Staff believes the data requested is needed to support development of rate design structures they endorse. The views concerning cost of service first took shape in an Ameren Missouri rate case, ER-2019-0335, expressed in the Rebuttal Testimony of Sarah L.K. Lange. In that testimony, Staff supported guidance published by the Regulatory Assistance Project

("RAP"), titled "Electric Cost Allocation for a New Era," by Jim Lazar, Paul Chernick and William Marcus, edited by Mark LeBel. These views extended into the Liberty Utilities rate case, ER-2019-0374 and Evergy rate cases, ER-2022-0129/0130. Most recently these views toward class cost of service studies were addressed again in Ameren rate case ER-2022-0337.

The views concerning rate design structures have been more aligned with Staff's visions for rate design and with data made available with the Automated Metering Infrastructure ("AMI") deployments and I believe originated within the Evergy rate cases ER-2022-0129/0130 and again appeared in Ameren rate case ER-2022-0337. The Staff views parallel those offered by RAP in their report "Smart Rate Design for a Smart Future."[2] If I understand the Staff intentions correctly, they prefer to ultimately move all customers to a rate structure similar to the following example from the RAP report[3].

Illustrative Residential Rate Design

Rate Element	Based On The Cost Of	Illustrative Rate
Customer Charge	Service Drop, Billing, and Collection Only	$4.00/month
Transformer Charge	Final Line Transformer	$1/kVA/month
Off-Peak Energy	Baseload Resources + transmission and distribution	$.07/kWh
Mid-Peak Energy	Baseload + Intermediate Resources + T&D	$.09/kWh
On-Peak Energy	Baseload, Intermediate, and Peaking Resources + T&D	$.14/kWh
Critical Peak Energy (or PTR)	Demand Response Resources	$.74/kWh

[2] Lazar, J. and Gonzalez, W. (2015). Smart Rate Design for a Smart Future. Montpelier, VT: Regulatory Assistance Project. Available at: http://www raponline.org/document/download/id/7680.
[3] Id., p. 50

As Staff has brought these cost allocation methods and rate design alternatives forward, they have sought data from the Company to support them.

Q: What has been the position of the Company to these requests?

A: Evergy has contested these cost allocation views as part of testimony, mainly in the ER-2022-0129/0130 cases. The primary concern is that most of the requested data is not readily available nor easily produced. These points have been detailed in the Summary Table offered earlier. The Company believes current cost allocation methods are suitable to inform ratemaking, particularly since the alignment between the rates and the respective costs have been managed through other policy considerations over the years. Any incremental precision offered by these new approaches is not worth the high cost of development and maintenance.

The Company position concerning the data to support rate design is more nuanced. In some respects, the Company supports examination of new approaches, but the realities of "big data" require higher levels of consideration. Availability of large amounts of data does not mean that the data is easily accessible. Computer systems have limited capability to store and manage large data sets. As a result, the Company has contested these data requests as well.

Q: Following the efforts to produce this data, what is the Company's view of the Staff request?

A: As the Company began to explore the requested data more deeply with the systems experts, our prior positions were largely affirmed. While we understand Staff's desire to leverage data now captured in Evergy's systems, the expectation that the various independent systems/processes can be treated as an integrated database that will provide reporting and

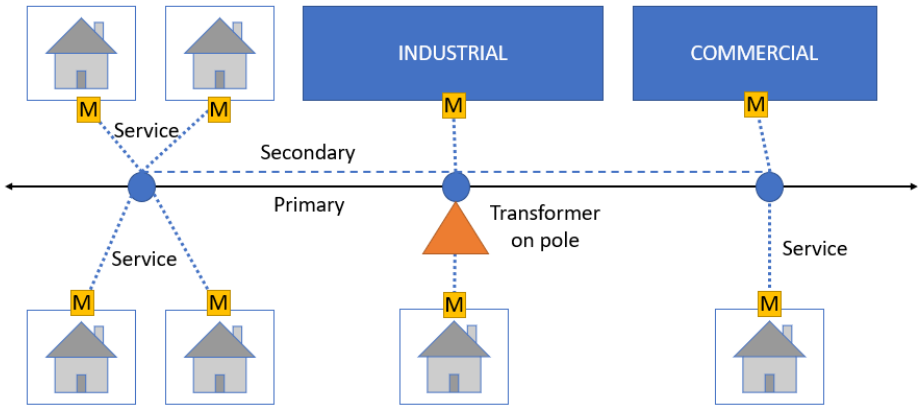
data analytics based on dynamic end user requirements is unrealistic. Given the limitations and estimated cost to provide associated with many of the requests as described in the collective Company testimony, the Company cannot approach the Staff's requests lightly.

Q: Beyond providing the reason why it cannot provide the requested data and an estimate of the cost to provide the requested data what does the Company wish to achieve within this docket?

A: Responding to this data request is complicated and the Company believed moving the effort outside of the constraints of a rate case would provide the best opportunity to provide the data. Alternatively, if the Company were unable to provide the data, the specific EO case would allow the Staff request to be evaluated by the Commission and a determination given on the provision of this data.

Q: In an earlier response you expressed particular concern with the data requested around distribution costs by voltage. Please describe why.

A: Staff seeks line transformer costs and expenses by rate code; primary distribution costs and expenses by voltage; secondary distribution costs and expenses by voltage; primary voltage service drop costs and expenses; line extension costs, expenses, and contributions by rate code and voltage; and meter costs by voltage and rate code. To begin, in practice, distribution facilities do not lend themselves to quantification by rate code. It is the nature of distribution facilities to be shared across customers to provide service. The Company operates a comprehensive grid to provide service to customers, not a collection of individualized services. The following figure is helpful to detail this point.



In this graphic, there are three spans of primary conductor (solid lines). On the middle pole (shaded circle) is a distribution transformer (shaded triangle) that steps down the primary voltage to serve the Secondary conductors (dashed lines) or Service conductors (dotted lines). In this example, the Secondary conductors in turn feed Service conductors on other poles. The Service conductors ultimately feed customer meters (squared "M"). In this example, most metered customers are residential, but one is commercial, and one is industrial. Within this scenario, the transformer provides service to multiple customer types and as a result, multiple rate codes. Costs cannot be directly attributable to the rate codes being served. Some approach to allocate the cost is required.

Second, accounting for distribution costs as mass property is a common allowable practice across many electric utilities. Within each book entry, the detail addresses a general description of the property and quantity; the quantity placed in service by vintage year; the average cost; and the plant control account to which the costs are charged. However, as mass property, FERC Uniform System of Accounts standards allow these asset costs to be treated in bulk, removing methods to individually track attributes, such as customer specific or rate code specific detail.

A third concern is with line extension costs, expenses, and contributions being desired to be tracked and/or recorded by rate code and voltage. Beyond the fact that line extension costs are not retained by rate code, all Evergy jurisdictions are subject to Line Extension policies. The policies, detailed in the Company Rules and Regulations, set forth methods to identify terms for extension of facilities including methods to identify cost responsibility. In general, the Company provides a standard allowance or method to calculate the allowance and the customer causing the extension is responsible for paying the remainder of these extension costs. This policy ensures that customers causing the extension of facilities, pays an appropriate amount for those facilities. These customer contributions serve to offset the cost of extensions and are not considered in the Staff request. With this detail, the value of "line extension costs, expenses, and contributions by rate code and voltage" data would be questionable.

A fourth concern is with how Company labor and overheads are attributed to distribution facilities. When distribution facilities are installed, they are normally done so through distinct "jobs." The jobs are work orders within the Company work management systems. These jobs detail all of the construction components needed to achieve a certain project. These components will include all forms of facilities, primary, secondary, service, poles, devices, and equipment. Once the job is completed, labor costs and company overheads incorporated in the components are unitized, converted into a single value and recorded in the Company book and records. Additionally, accounting functions such as depreciation, Allowance for Funds Used During Construction ("AFUDC") and depreciation are applicable to plant costs and would be introduced through the accounting process. The inclusion of these costs may cause the costs studies to vary from the expected

values and make the results unreliable for rate setting purposes. Company witness Sean Riley explores these facts in more detail within his testimony.

Q: Are these costs represented in the class cost of service studies currently prepared by the Company?

A: Yes. Specific Plant Accounts and Expense Accounts identify costs related to distribution facilities. The costs are not differentiated by voltage or rate code but are allocated between the customer classes. The Company studies provide detailed information about the following distribution costs.

Distribution Plant	
Account	**Description**
360.00	Land and Land Rights
360.00	Depreciable Land Rights
361.00	Structures and Improvements
362.00	Station Equipment
362.00	Station Equipment - Communications
363.00	Battery Storage Equipment
364.00	Poles, Towers and Fixtures
365.00	Overhead Conductors and Devices
366.00	Underground Conduit
367.00	Underground Conductors and Devices
368.00	Line Transformers
369.00	Services
370.00	Meters
371.00	Installations on Customers' Premises
372.00	Leased Property on Customers' Premises
373.00	Street Lighting and Signal Systems
374.00	Asset Retirement Costs for Distribution Plant

Distribution Operations	
Account	**Description**
580.00	Distribution Operation - Supr & Engineering
581.00	Distribution Operation - Load Dispatching
582.00	Distribution Operation - Station Expense
583.00	Dist Operation Overhead Line Expense
584.00	Dist Operation Underground Line Expense
585.00	Distrb Oper Street Light & Signal Expense
586.00	Distribution Operation Meter Expense
587.00	Distrb Operation Customer Install Expense
588.00	Dist Operation Miscl Distribution Expense
589.00	Distribution Operations Rents

Distribution Maintenance	
Account	**Description**
590.00	Distribution Maint-Suprv & Engineering
591.00	Distribution Maintenance-Structures
592.00	Distribution Maintenance-Station Equipment
593.00	Distribution Maintenance-Overhead lines
594.00	Distrib Maint-Maintenance Underground Lines
595.00	Distrib Maint-Maintenance Line Transformer
596.00	Distrib Maint- Maintenance St Lights/Signal
597.00	Distrib Maint-Maintenance of Meters
598.00	Distrib Maint-Maint Miscl Distribution Plant

Q: Are these costs aligned with representative charges in the Company rate designs?

A: No. There is no single charge in the current rate design to recover cost associated with distribution facilities. These costs are currently spread across the bill elements of the rate designs, recovered at some level, through the Facilities Demand, Demand, and Energy charges of the non-residential rates. For residential rates, these costs are contained within the energy charges. Steps could be taken to better align costs with rate elements before seeking greater detail for distribution plant.

Q: You describe that other parts of the data requested by Staff are to support new rate design approaches. What is your opinion concerning this design?

A: The Company is in the process of considering the design elements suggested by RAP and endorsed by Staff. Specific to the application of this design to non-Residential customers, the Company is actively discussing the design with Staff, representatives of Industrial customers and other utilities. The Company has interest in exploring the designs further.

Q: Given that you support further examination of the designs, do you support Staff's requests for the data requested for rate design support?

A: In part. I support that additional data will be needed to understand the potential value of these rate designs, but we must remain practical in our execution of these requests. For example, Staff seeks determinants to support reactive demand charges - an issue that may or may not be of concern. As expressed throughout this testimony, Company resources and available time are limited, so steps should be considered to prioritize needs and look for alternative approaches that can leverage existing data to execute early studies and confirm need.

Q: You mentioned that these topics have been raised with other Missouri utilities. Are you aware if the other Missouri utilities are providing this or similar data?

A: We have been monitoring case activity in the state and note that Liberty Utilities has agreed to provide some aspects of the data requested from Evergy, but at this point I am unaware if the data has been provided.

For Ameren Missouri we note that many similar data retention requests occurred in their 2019 rate case, ER-2019-0355. Following testimony on the respective positions, Ameren Missouri addressed the issue in a negotiated settlement. [4] OBJ

Questions related to data and data retention continued into Ameren Missouri's next rate case, ER-2022-0337, ultimately going to hearing before the Commission. After cross examination on the topic, the Commission ordered,

> So that sufficient information and data is available for analysis, The Commission finds it reasonable to direct Ameren Missouri to conduct and provide a study of the customer-specific infrastructure, by account, by rate schedule, by voltage, in its next general rate case. Additionally, the Commission finds it reasonable to direct Ameren Missouri to retain customer and rate schedule characteristics related to draws of reactive demand. Ameren Missouri is also directed to provide data concerning the level of rate base and expense associated with radial transmission facilities, including substation components by customer, for its next rate case. Staff expressed multiple times that it was unable to complete analysis necessary for an exploration of rate modernization because the information that Staff requested was unavailable. Staff also stated that it did not know "the universe" of what information exists. Staff supplied, at the hearing and in testimony, an extensive list of information that would assist its analysis in any rate modernization workshop. The Commission is reluctant to order Ameren Missouri to provide all the information that Staff requested, not because the Commission believes it unnecessary, but because the Commission does not know the full extent of information Ameren Missouri can provide, or the expense associated with collecting that information. The Commission finds it reasonable that Ameren Missouri provide more granular data for any rate modernization workshop, nonresidential working docket, and the Company's next rate case. Therefore, the Commission directs Ameren Missouri to provide the information Staff requested that it can provide at reasonable expense. Ameren Missouri shall also work with Staff to provide a better understanding of what information is available, so that Staff can better request information the Company can access. Finally, Staff has requested that the Commission direct Ameren Missouri to study potential rate structures and make available related determinants. The Commission does not find this request reasonable and will not order Ameren Missouri to conduct such a study.[5]

[4] See, p. 16, ER-2019-0355 Non-Unanimous Stipulation and Agreement, February 28, 2020.
[5] See, Ameren Order ER-2022-0337 p. 48.

As of the date of this testimony, the nonresidential working docket is underway and the Company has participated in the initial meeting.

Q: The Company analysis shows that the effort to obtain much of the data would be expensive to execute. Do you feel this is a prudent use of resources?

A: No, data requests 1, 5 and 6 should be rejected by the Commission as impractical requests. The remainder of the data requests are individually more reasonable, but collectively significant. Data requests 2, 3, 4, 8, and 9 should only be provided with support from the Commission to do so. Date request 7, a request detailing data retention timing, is already being done by the Company, so there are no concerns with complying.

The Company must be good stewards with respect to cost. I believe it is important to affirm that costs produce a benefit. The Company testimony is offered to provide the Commission a full view of the cost.

Q: Does that conclude your testimony?

A: Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Requests from Evergy Missouri Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Customer Data Account Data Production	)))))	No. EO-2024-0002

AFFIDAVIT OF BRADLEY D. LUTZ

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Bradley D. Lutz, being first duly sworn on his oath, states:

1. My name is Bradley D. Lutz. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Director, Regulatory Affairs.

2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Evergy Missouri Metro and Evergy Missouri West consisting of twenty-four (24) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

Bradley D. Lutz

Subscribed and sworn before me this 1st day of November 2023.

Notary Public

My commission expires: 4/26/2025

ANTHONY R. WESTENKIRCHNER
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 26, 2025
PLATTE COUNTY
COMMISSION #17279952

DATA REQUEST ASSESSMENT SUMMARY					
DATA REQUEST #	***DATA REQUESTED***	***AVAILABILITY ASSESSMENT***	***DELIVERABILITY ASSESSMENT***	***ESTIMATED COST TO PROVIDE***	***NOTES***
1	Prior to the next rate case, the Company will identify and provide the data required to determine: line transformer costs and expenses by rate code; primary distribution costs and expenses by voltage; secondary distribution costs and expenses by voltage; primary voltage service drop costs and expenses; extension costs, expenses, and contributions by rate code and voltage; and meter costs by voltage and rate code. If the required data is not readily available, the Commission should order Evergy to file an EO docket explaining why it cannot provide the data, and its individual estimate of the cost to provide each set of data described, for the further consideration of the parties and the Commission.	**NOT AVAILABLE** Neither capital investments nor maintenance expenses are currently tracked by voltage class or rate code. In some instances current capital investments and expenses impact multiple primary voltages and rate codes.	**COMPLEX DELIVERABILITY** Neither capital investments nor maintenance expenses are currently tracked by voltage class or rate code. In some instances current capital investments and expenses impact multiple primary voltages and rate codes.		For distribution system costs that are attributable to specific individual customers and rate schedule/code would require an overhaul of the entire cost tracking and work management recording processes and systems. Individual systems are separate and have singular purposes with no natural alignment that would enable syncing and connection. As such, it would require consultation with system experts to not only configure the individual systems for linkage, but also assist with creating dynamic integrated processes to allow for the tracking and reporting of the data being requested. To support this request, Evergy would also likely need to hire on-going resources to sustain these processes to support an expectation of continual creation, tracking, storing, and reporting of this data.
2	For each rate code, provide the total number of customers served on that rate schedule on the first day of the month and the last day of the month; a. For each rate schedule on which customers may take service at various voltages, the number of customers served at each voltage on the first day of the month and the last day of the month (this is only applicable if rate codes are not used to delineate the voltage at which customers are served)	**AVAILABLE** The data exists in MDM/CCB at individual customer and meter level.	**PLAUSABLE DELIVERABILITY** This still requires work to pull out, aggregate and validate based on specific requirements. See questions in notes.		Based on total number of active service agreements on each rate code.
3	For each rate code, the number of customers served on that rate schedule on the first day of the month and the last day of the month for which interval meter readings are obtained; a. For each rate code on which customers may take service at various voltages, the number of customers served at each voltage on the first day of the month and the last day of the month which interval meter readings are obtained (this is only applicable if rate codes are not used to delineate the voltage at which customers are served);	**AVAILABLE** The data exists in MDM/CCB at individual customer and meter level.	**PLAUSABLE DELIVERABILITY** This still requires work to pull out, aggregate and validate based on specific requirements. And will require components from both CCB/MDM to complete. See questions in notes.		Based on total number of active service agreements with meters that can collect interval data. i.e. AMI meters.
4	For each rate code for which service is available at a single voltage, the sum of customers interval meter readings, by interval; a. For each rate code on which customers may take service at various voltages, the sum of customers interval meter readings, by interval and by voltage (this is only applicable if rate codes are not used to delineate the voltage at which customers are served);	**PARTIALLY AVAILABLE** Interval meter reading is stored at an individual meter level in MDM. The aggregate suggested is not stored in MDM or the data hub. (interval by rate code).	**PLAUSABLE DELIVERABILITY** Data recording processes currently exist to capture summarized hourly interval data by class. Such processes could be explored to be modified to capture individual rate codes. Currently processes, capture hourly data only.		Based on hourly intervals.
5	If any internal adjustments to customer interval data are necessary for the company s billing system to bill the interval data referenced in parts 4. and 4.a., such adjustments should be applied to each interval recording prior to the customers data being summed for each interval	**NOT AVAILABLE** The data hub does not reflect any updates to interval usage information.	**COMPLEX DELIVERABILITY** Do not believe this to be a report ask, but believe this to be a process and system change for data hub.		Evergy s MDM/CCB systems house corrections/updates of data in near real time. Data is posted to the Data Hub, the source for reporting, periodically. Modifications to align data within these systems would require extensive configuration and the utilization of MDM/CCB/Data Warehouse consultants to enable.
6	From time to time the Commission may designate certain customer subsets for more granular study. If such designations have been made, the information required under parts 1 – 5 should be provided or retained for those instances.	**PARTIALLY AVAILABLE** For the items in 1-5 above where the Company can provide the data, it will be retained for data availability.	**COMPLEX DELIVERABILITY** Ability to comply with an unknown future request of additional more granular data cannot be proactively ensured.		See comments for Items #1 through #5.
7	Individual customer interval data shall be retained for a minimum of fourteen months. If individual data is acquired by the Company in intervals of less than one hour in duration, such data shall be retained in intervals of no less than one hour.	**AVAILABLE** Evergy retains interval data for individual customers as billing standards require in the CCB/MDM systems.	**NOT APPLICABLE**		Evergy retains interval data for six years in MDM, and summarized usage is retained the data hub. Data hub aggregations began in January of 2020.
8	a.Retain individual hourly data for use in providing bill-comparison tools for customers to compare rate alternatives.	**AVAILABLE** Evergy retains interval data for individual customers as billing standards require in the CCB/MDM systems.	**NOT APPLICABLE**		Based on retaining individual hourly data. Evergy via a third party, offers a customer facing tool creating bill comparisons for residential customers (with qualifying data). The individual analysis for rate compares is dynamic and Evergy does not store or retain these individual comparisons.

DATA REQUEST ASSESSMENT SUMMARY					
DATA REQUEST #	***DATA REQUESTED***	***AVAILABILITY ASSESSMENT***	***DELIVERABILITY ASSESSMENT***	***ESTIMATED COST TO PROVIDE***	***NOTES***
8	b. Retain coincident peak determinants for use in future rate proceedings.	**AVAILABLE** Evergy retains interval data for individual customers as billing standards require in the CCB/MDM systems.	**COMPLEX DELIVERABILITY** If this requirement suggests providing a 15 minute view of system peak, this data cannot be delivered in the format suggested.		Evergy can provide hourly data by rate class for all hours of the day for every day of the year as is currently provided in rate cases. As noted in item 4, an aggregated view of hourly data by rate code can be pursued. 15 minute interval data is not currently stored in the Data Hub and therefore cannot be aggregated as described.
8	c. 1) the information described in part 1;	**NOT AVAILABLE** Neither capital investments nor maintenance expenses are currently tracked by voltage class or rate code. In some instances current capital investments and expenses impact multiple primary voltages and rate codes.	**COMPLEX DELIVERABILITY** Neither capital investments nor maintenance expenses are currently tracked by voltage class or rate code. In some instances current capital investments and expenses impact multiple primary voltages and rate codes.		See Item #1
8	c. 2) a minimum of 12 months of the data described in parts 2-5;	**SEE INDIVIDUAL ITEMS ABOVE**	**SEE INDIVIDUAL ITEMS ABOVE**		
8	c. 3) for rate codes with more than 100 customers, a sample of individual customer hourly data, and identified peak demands for those 100 customers in the form requested at that time (i.e. monthly 15 minute non-coincident, annual 1 hour coincident);	**AVAILABLE** The data exists in MDM/CCB at individual customer and meter level.	**PLAUSABLE DELIVERABILITY** Configuration would be needed to facilitate/extract data.		Based on delivery of hourly data for sample of 100 customers.
8	c. 4) for rate codes with 100 or fewer customers, individual customer hourly data, and identified peak demands for those customers in the form requested at that time (i.e. monthly 15 minute non coincident, annual 1 hour coincident).	**AVAILABLE** The data exists in MDM/CCB at individual customer and meter level.	**PLAUSABLE DELIVERABILITY** Configuration would be needed to facilitate/extract data.		Based on delivery of hourly data for sample of 100 customers.
8	d. For purposes of general rate proceedings, Evergy shall provide all data described above for a period of not less than 36 months, except that Staff does not request individual customer data for 36 months except as described in part 8.c.3.	**SEE INDIVIDUAL ITEMS ABOVE**	**SEE INDIVIDUAL ITEMS ABOVE**		The creation of a sustainable dynamic process that captures all of the data above, that retroactively corrects/modifies based on downstream/future changes, and the incorporation of individual capture and manual intervention to facilitate sampling at any/all intervals based on later clarification for a 36 month period is likely not possible without extensive system/process overhaul and configuration as detailed in the individual items above.
9	Staff recommends that EMM and EMW be ordered to develop the determinants for assessment of an on-peak demand charge to replace the current monthly billing demand charge, and for potential implementation for customers not currently subject to a demand charge. At this time, Staff recommends that in summer months the period be noon – 10 pm, and during non-summer months the period be 6 am – 10 pm, but Staff welcomes the input of other parties to refine this time periods. Staff does not recommend that weekends and holidays be excluded. Second, Staff recommends the EMM and EMW begin to retain and study data related to the reactive demand requirements of each rate code, and sample customers within each rate code. While in recent history reactive demand has not been a determinant in CCOS studies or a rate element for many customers, emerging system conditions associated with changes in regional generation fleets may occasion further study of reactive demand requirements.	**PARTIALLY AVAILABLE** Data is being retained to develop an on peak charge. Determinants are being retained for rates where reactive demand is a component. Expanded determinants dependent on study design.	**PLAUSABLE DELIVERABILITY** Configuration would be needed to facilitate/extract data to develop an on peak charge. Reactive demand data is currently provided as part of rate design process. Expanded reporting dependent on study design.		Currently, MDM systems collect meter interval data for all hours of the day, 365 days of the year for customers with AMI meters. Configuration would be needed to create reporting for the collection of hourly kw during any peak period identified. Evergy does not have a study design in place to inform the portion of the is data request related to reactive demand.