BEFORE THE PUBLIC SERVICE COMMISION
OF THE STATE OF MISSOURI

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

MOTION TO COMPEL

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by counsel, and in support of its *Motion to Compel* states as follows:

1. On October 5, 2023, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (EMM) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (EMW) (collectively, "Evergy"), on behalf of the parties, filed a *Joint Proposed Procedural Schedule* the above-captioned case.

2. As part of its October 18, 2023 *Order Setting Procedural Schedule* (*Order*), several procedures were established, including discovery dispute resolution procedures. Specifically, it states, in paragraph 3.E.(1) that "A party with an unresolved discovery dispute may file a motion to request a discovery conference."

3. Between November 2, 2023, and November 14, 2023, Staff served over 170 Data Requests (DRs) upon Evergy. Evergy filed objections to, was delinquent in responding to, and failed to fully and completely answer many of the DRs Staff propounded upon Evergy.

4. On November 16, 2023, Staff requested a discovery conference to be scheduled, pursuant to the October 18, 2023 *Order* so that the parties could discuss and resolve the issues surrounding the objections made by Evergy to Staff's DRs that remained unanswered and unresolved.

5. On November 17, 2023, the Commission entered an *Order Setting Webex Discovery Conference*, and on November 21, 2023, the discovery conference was held in the above-captioned case.

6. During the November 21, 2023 discovery conference, the Judge found that counsel for Staff had attempted to resolve the discovery issues with counsel for Evergy prior to the telephone conference being held but had failed, in compliance with 20 CSR 4240-2.090(8), and therefore ordered Staff Counsel to file this *Motion to Compel*.

7. This *Motion* requests the Commission compel Evergy to respond with complete responses, in that Staff argues that Evergy's responses to the following DRs, to date, have been insufficient, incomplete, and inadequate:

a. For EMM, DRs 7, 9, 10 - 14, 16 – 31, 33 - 35, 37 - 40, 42 - 45, 47 - 49, 51 - 53, 55 - 67, 69, and 70 - 75; and

b. For EMW, DRs 78, 80 - 85, 87 - 102, 104 -106, 108 - 111, 113 - 116, 118 - 120, 122 - 124, 126 - 138, 140 - 146, and 148.

8. The Staff's reasoning for compelling Evergy's responses to the above-listed DRs can be broken down into two categories, as follows:

a. For the following DRs, Evergy would have had to compile the information or obtain the data requested by Staff in order to prepare their respective witnesses' testimony. Furthermore, in order to comply with the August 2022 *Stipulation and Agreement,* Evergy would have to currently be in possession of the data requested by these DRs. Therefore, the Company

should have already had the data requested by the applicable DR. Specifically, those DRs are listed as follows[1]:

i. For EMM, DRs 7, 9, 11, 16, 17, 20, 21, 22, 23, 24, 25, 26, 28, 29, 33, 37, 42, 45, 47, 51, 55, 57, 58, 59, 62, 63, 71, and 72; and

ii. For EMW, DRs 78, 80, 82, 87, 88, 91, 92, 93, 94, 95, 96, 97, 99, 100, 104, 108, 113, 116, 118, 122, 126, 128, 129, 130, 133, 134, 142, and 143.

b. For the following DRs, the information requested by Staff is information that is (a) properly discoverable, (b) necessary to evaluate the reasonableness of the "alternative data" that Evergy witness Brad Lutz references in his testimony, and (c) necessary to discuss the reasonableness and cost-effectiveness of other data alternatives to compare to the cost of the data Evergy did provide in its direct testimony. Specifically, those DRs are listed as follows:

i. For EMM, DRs 10, 12, 13, 14, 18, 19, 27, 30, 31, 34, 35, 38, 39, 40, 43, 44, 48, 49, 52, 53, 56, 60, 61, 64, 65, 66, 67, 69, 70, 73, 74, 75, and 77;

ii. For EMW, DRs 81, 83, 84, 85, 89, 90, 98, 101, 102, 105, 106, 110, 111, 114, 115, 119, 120, 123, 124, 127, 131, 132, 135, 136, 137, 138, 140, 141, 144, 145, 146, and 148.

9. Much of the information requested by Staff in the listed DRs is information that the Company stipulated it would provide to Staff when it entered into the August 2022

[1] A list of the DRs listed in subparagraphs 8.a.i, and ii., and b.i. and ii., are attached to this motion as Attachment A and incorporated herein by reference.

Stipulation and Agreement. Evergy stipulated that it would provide certain data and the cost to provide it, or else provide the reason it cannot provide the data. Staff is merely requesting information through the listed DRs to obtain information about those promises made by the Company. The Company committed to produce that information and should be able to respond to inquiries about that information.

10. For example, Evergy committed to identify and provide data required to determine line transformer costs, expenses by voltage, secondary distribution costs, expenses by voltage, primary voltage service drop costs and expenses, line extension costs expenses, contributions by rate code and voltage, and meter cost by voltage and rate code, among other data. Instead, when presented with DRs requesting such information, Evergy responded with an answer that was not based on relevant information, or stated the Company did not look at any individual component at all when arriving at its answer or did not perform any analysis whatsoever, and therefore, refused to answer the DR.

11. Furthermore, when Staff requested data spanning a specific amount of time, i.e., 10 years of account data, Evergy refused to provide the full time frame of data, instead only providing a portion of the information.

12. In other instances, Evergy responded to Staff's DRs with answers that included "disclaimer information" stating Staff should not rely on the Company's property records, as they may be inaccurate or from some unreliable dataset. Such responses are vague, ambiguous and provide the Staff with little to no actual information.

13. Title 20 CSR 4240-2.090(1) allows parties to obtain discovery "by the same means and under the same conditions as in civil actions in the circuit court." The use of data requests are one means of obtaining such discovery. 20 CSR 4240-2.090(2).

14. The Commission's discovery rule provides that it will not entertain a discovery motion until the moving party conferred or attempted to confer by telephone or in person with the opposing counsel concerning the matter prior to filing of the motion. 20 CSR 4240-2.090(8)(A). Pursuant to that rule, the undersigned certifies compliance with this rule.

15. Under Rule 56.01(b)(1), as long as the matter "is relevant to the subject matter involved in the pending action, … provided the discovery is proportional to the needs of the case considering the totality of the circumstances, including, but not limited, to the importance of the issues at stake in the action, … the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expenses of the proposed discovery outweighs its likely benefit," a party is entitled to that information sought. The information need only be "reasonably calculated to lead to the discovery of admissible evidence."

16. The subject matter of the pending action is whether Evergy has or is capable of complying with the terms of the August 2022 *Stipulation and Agreement* with respect to its data retention practices.

17. As such, the information requested in the above-mentioned DRs are relevant to the subject matter of the pending case, and likely to lead to the discovery of admissible evidence.

18. This motion is made in the interest of justice and without the intent to unreasonably delay or hinder these proceedings in any manner.

WHEREFORE, for the foregoing reasons, Staff requests the Commission to issue an *Order* compelling Respondent to provide full and complete responses to the data requests listed in paragraphs 8.a.i. and ii. and b.i. and ii., above, within 10 days of its *Order*, and for such other orders it deems reasonable and just under the circumstances.

Respectfully submitted,

/s/ Carolyn H. Kerr
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, on this 3rd day of January, 2024, to all counsel of record.

/s/ Carolyn H. Kerr

Data Requests Listed in Paragraph 8.a.i. and ii.

Metro #	West #	Question
7	78	What is Evergy MISSOURI METRO's estimate of the cost to estimate line transformer cost and expenses by rate code?
9	80	What Evergy MISSOURI METRO rate codes are available to customers served at a secondary voltage?
11	82	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify line transformer costs by rate code? (b) In Evergy MISSOURI METRO's opinion what data is necessary to identify line transformer expenses by rate code? (c) In what systems are the data necessary to identify line transformer costs by rate code stored? (d) In what systems are the data necessary to identify line transformer expenses by rate code stored?
16	87	What is Evergy MISSOURI METRO's estimate of the cost to estimate primary distribution system costs and expenses associate with its underground system by rate code?
17	88	What is Evergy MISSOURI METRO's estimate of the cost to estimate primary distribution system costs and expenses associate with its overhead system by rate code?
20	91	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify primary distribution costs by rate code? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify primary distribution operations expenses by rate code? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify primary distribution maintenance expenses by rate code? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify primary distribution costs by rate code?
21	92	What is Evergy MISSOURI METRO's estimate of the cost to estimate secondary distribution system costs and expenses associated with its underground system by rate code?
22	93	What is Evergy MISSOURI METRO's estimate of the cost to estimate secondary distribution system costs and expenses associated with its overhead system by rate code?
23	94	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify secondary distribution costs by rate code? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify secondary distribution operations expenses by rate code? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify secondary distribution maintenance expenses by rate code? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify secondary distribution costs by rate code?

24	95	(a) What is Evergy MISSOURI METRO's estimate of the cost to estimate primary voltage service drop costs and expenses associated with its underground system by rate code? (b) What is Evergy MISSOURI METRO's estimate of the cost to estimate primary voltage service drop costs and expenses associated with its overhead system by rate code? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify primary voltage service drop costs by rate code? (d) In Evergy MISSOURI METRO's opinion, what data is necessary to identify primary voltage service drop operations expenses by rate code? (e) In Evergy MISSOURI METRO's opinion, what data is necessary to identify primary voltage service drop maintenance expenses by rate code?
25	96	In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify primary voltage service drop costs by rate code?
26	97	What is Evergy MISSOURI METRO's estimate of the cost to estimate service drop costs and expenses by rate code?
28	99	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify line extension costs and contributions by rate code? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify line extension operations expenses by rate code? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify line extension maintenance expenses by rate code? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify line extension costs and contributions by rate code?
29	100	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Poles costs by voltage? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Poles operations expenses by voltage? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Poles maintenance expenses by voltage? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify Poles costs, operations expenses, and maintenance expenses by voltage?
33	104	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground conduit costs by voltage? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground conduit operations expenses by voltage? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground conduit maintenance expenses by voltage? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify Underground conduit costs, operations expenses, and maintenance expenses by voltage?
37	108	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Overhead conductor costs by voltage? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Overhead conductor operations expenses by voltage? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Overhead conductor maintenance expenses by voltage? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify Overhead conductor costs, operations expenses, and maintenance expenses by voltage?

42	113	In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground conductor costs by voltage? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground conductor operations expenses by voltage? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground conductor maintenance expenses by voltage? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify Underground conductor costs, operations expenses, and maintenance expenses by voltage?
45	116	Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to determine how many miles of underground conductor operate at each of the most common voltages served, and determine which retirement units or plant characteristics are utilized.
47	118	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Overhead devices costs by voltage? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Overhead devices operations expenses by voltage? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Overhead devices maintenance expenses by voltage? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify Overhead devices costs, operations expenses, and maintenance expenses by voltage?
51	122	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground devices costs by voltage? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground devices operations expenses by voltage?(c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground devices maintenance expenses by voltage? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify Underground devices costs, operations expenses, and maintenance expenses by voltage?
55	126	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify the costs associated with distribution infrastructure operating at a primary voltage utilized by a single customer? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify the operations expenses associated with distribution infrastructure operating at a primary voltage utilized by a single customer? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify the maintenance expenses associated with distribution infrastructure operating at a primary voltage utilized by a single customer? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify the costs, operations expenses, and maintenance expenses associated with distribution infrastructure operating at a primary voltage utilized by a single customer?

57	128	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify the costs associated with distribution infrastructure operating at a secondary voltage utilized by a single customer not recorded to a services or line transformer account? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify the operations expenses associated with distribution infrastructure operating at a secondary voltage utilized by a single customer not recorded to a services or line transformer account? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify the maintenance expenses associated with distribution infrastructure operating at a secondary voltage utilized by a single customer not recorded to a services or line transformer account? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify the costs, operations expenses, and maintenance expenses associated with distribution infrastructure operating at a secondary voltage utilized by a single customer not recorded to a services or line transformer account? (e) Please provide the number of the locations at which distribution infrastructure operating at a secondary voltage utilized by a single customer occurs on Evergy MISSOURI METRO's system, where such infrastructure is not recorded to a services or line transformer account. (f) Please identify Evergy MISSOURI METRO's estimate of the number of customer locations at which distribution infrastructure operating at a primary voltage is utilized by a single customer, where such infrastructure is not recorded to a services or line transformer account. (g) Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected locations where distribution infrastructure operates at a secondary voltage utilized by a single customer, and determine the associated property units and quantities.
58	129	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify the costs associated with transmission or subtransmission infrastructure utilized by a single customer not recorded to a services or line transformer account? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify the operations expenses associated with transmission or subtransmission infrastructure utilized by a single customer not recorded to a services or line transformer account? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify the maintenance expenses associated with transmission or subtransmission infrastructure utilized by a single customer not recorded to a services or line transformer account? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify the costs, operations expenses, and maintenance expenses associated with transmission or subtransmission infrastructure utilized by a single customer not recorded to a services or line transformer account? (e) Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected locations where transmission or subtransmission infrastructure is utilized by a single customer, and determine the associated property units and quantities. (f) Please identify Evergy MISSOURI METRO's estimate of the number of customer locations at which transmission or subtransmission infrastructure is utilized by a single customer.
59	130	(a) What is Evergy MISSOURI METRO's estimate of the cost to estimate meter costs and expenses by rate code? (b) For each Evergy MISSOURI METRO rate code, please identify the voltages at which customers may be served, and the number of

		customers served at each voltage as of July 1, 2023, July 31, as of October 1, 2023, and as of October 31, 2023.
62	133	Is Evergy able to identify meter costs by rate code? If so, please provide the meter costs by rate code for Evergy MISSOURI METRO as of July 1, 2023, and as of November 1, 2023.
63	134	(a) In Evergy's opinion what data is necessary to identify meter costs by voltage and rate code? (b) In what systems are the data necessary to identify meter costs by voltage and rate code stored?
71	142	(a) For which rate codes is Evergy MISSOURI METRO capable of producing the sum of customer usage for each of 8,760 hours in a year for those customers who are AMI metered? (b) Separately for each Evergy MISSOURI METRO rate code, provide Evergy MISSOURI METRO's estimate of the cost to become capable of producing the sum of customer usage for each of 8,760 hours in a year for those customers who are AMI metered?
72	143	(a) Does Evergy MISSOURI METRO retain individual customer interval data for a minimum of fourteen months in intervals of no less than one hour? If so, for which customers?(b) Separately for each Evergy MISSOURI METRO rate code, provide Evergy MISSOURI METRO's estimate of the cost to become capable of retaining individual customer usage for each of 8,760 hours in a year for those customers who are AMI metered? (c) Does Evergy MISSOURI METRO retain individual customer interval data for use in providing bill-comparison tools for customers to compare rate alternatives? If so, for which customers? (d) What is Evergy MISSOURI METRO's estimate of the cost to retain individual customer interval data for use in providing bill-comparison tools for customers to compare rate alternatives?

Data Requests Listed in Paragraph 8.b.i. and ii.

Metro #	West #	Question
10	81	For account 368, please provide Evergy MISSOURI METRO's gross plant, depreciation reserve, net plant, and depreciation expense for each year 2013 - 2023, year-end balance, or most current balance available for the current year. (b) Please provide annual expense recorded to account 595 maintenance of line transformers, for each year 2013 - 2023 as of year-end, or the most current value available for the current year. (c) Please provide the portion of annual expense recorded to each, separately, account 583 overhead line expenses and 584 underground line expenses, associated with line transformers, for each year 2013 - 2023 as of year-end, or the most current values available for the current year.

12	83	(a) Please provide the number of line transformers on Evergy MISSOURI METRO's system, based on its continuing property record, for each year 2013 - 2023 as of year-end, or the most current values available for the current year. (b) For each other system in which the quantity of operating line transformers on Evergy MISSOURI METRO's system is contained, for each year 2013 - 2023 as of year-end, or the most current values available for the current year, please provide the quantity of operating line transformers. (c) For each other system in which the quantity of warehoused or stored line transformers on Evergy MISSOURI METRO's system is contained, for each year 2013 - 2023 as of year-end, or the most current values available for the current year, please provide the quantity of warehoused or stored line transformers.
13	84	(a) Please identify the number of line transformers that are currently in operation that provide service to more than one customer account. (b) Please identify the number of line transformers that are currently in operation that provide service exactly one customer account. (c) Please identify the number of line transformers that are currently in operation that provide service to between two and five customer accounts. (d) Please identify the number of line transformers that are currently in operation that provide service to between six and ten customer accounts. (e) Please identify the number of line transformers that are currently in operation that provide service to more than 20 customer accounts. (f) If the number of customer accounts served by line transformers is not known, please identify the information that Evergy MISSOURI METRO would need to obtain to determine that information, and define which system(s) that information is stored in. (g) Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected line transformers to determine the number of customers served, retirement unit of transformer, and rate schedule of customers served.

14	85	(a) How many line transformers have been installed by Evergy MISSOURI METRO in each year 2018 - 2023? (b) What is the most frequently installed line transformer installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential customers in a subdivision? Please provide physical description, retirement unit name, and average cost per unit per year. (c) What is the most frequently installed line transformer installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential single family customers not in a subdivision? Please provide physical description, retirement unit name, and average cost per unit per year. (d) What is the most frequently installed line transformer installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential multi-family customers with less than 5 meters. Please provide physical description, retirement unit name, and average cost per unit per year. (e) What is the most frequently installed line transformer installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential multi-family customers with more than 5 but less than 15 meters. Please provide physical description, retirement unit name, and average cost per unit per year. (f) What is the most frequently installed line transformer installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential multi-family customers with more than 15 meters. Please provide physical description, retirement unit name, and average cost per unit per year. (g) What are the five most frequently installed line transformers installed by Evergy MISSOURI METRO in each year 2018 - 2023 for stand-alone commercial customers receiving single phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common line transformers, please describe those characteristics. (h) What are the five most frequently installed line transformers installed by Evergy MISSOURI METRO in each year 2018 - 2023 for stand-alone commercial customers receiving multi-phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common line transformers, please describe those characteristics. (i) What are the five most frequently installed line transformers installed by Evergy MISSOURI METRO in each year 2018 - 2023 for stand-alone industrial customers receiving single phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common line transformers, please describe those characteristics. (j) What are the five most frequently installed line transformers installed by Evergy MISSOURI METRO in each year 2018 - 2023 for stand-alone industrial customers receiving multi-phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common line transformers, please describe those characteristics. (k) What are the five most frequently installed line transformers installed by Evergy MISSOURI METRO in each year 2018 - 2023 for multiple commercial customers sharing a line transformer receiving single phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common line transformers, please describe those characteristics.(l) What are the five most frequently installed line transformers

		installed by Evergy MISSOURI METRO in each year 2018 - 2023 for multiple commercial customers sharing a line transformer receiving multi-phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common line transformers, please describe those characteristics. (m) What are the five most frequently installed line transformers installed by Evergy MISSOURI METRO in each year 2018 - 2023 for multiple industrial customers sharing a line transformer receiving single phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common line transformers, please describe those characteristics. (n) What are the five most frequently installed line transformers installed by Evergy MISSOURI METRO in each year 2018 - 2023 for multiple industrial customers sharing a line transformer receiving multi-phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common line transformers, please describe those characteristics.
18	89	For accounts 360 (Land and land rights), 361 (Structures and improvements), 362 (Station Equipment), 363 (Energy storage equipment - distribution), 364 (poles, towers, and fixtures), 365 (overhead conductors and devices), 366 (underground conduit), 367 (underground conductors and devices), and 371 (installations on customers' premises) separately, please provide Evergy MISSOURI METRO's gross plant, depreciation reserve, net plant, and depreciation expense for each year 2013 - 2023, year-end balance, or most current balance available for the current year.
19	90	For each distribution maintenance and each distribution operation account, provide annual expense recorded for each year 2013 - 2023 as of year-end, or the most current value available for the current year.
27	98	For accounts 369.1 (overhead services) and 369.2 (underground services), separately, please provide Evergy MISSOURI METRO's gross plant, depreciation reserve, net plant, and depreciation expense for each year 2013 - 2023, year-end balance, or most current balance available for the current year.

30	101	(a) Please provide the number of Poles on Evergy MISSOURI METRO's system, based on its continuing property record, for each year 2013 - 2023 as of year-end, or the most current values available for the current year. (b) For any data set other than the continuing property record which contains information concerning the number of in-service Poles on Evergy MISSOURI METRO's system, provide the number in service, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (c) For any data set other than the continuing property record which contains information concerning the number of stored or warehoused Poles, provide the number stored or warehoused, for each year 2013 - 2023 as of yearend, or the most current values available for the current year.
31	102	Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected Poles at each of the three most common heights, and 20 random poles at each of the next three most common heights and determine the voltages at which each pole supports operations.
34	105	(a) Please provide the number of feet of Underground conduit on Evergy MISSOURI METRO's system, based on its continuing property record, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (b) For any data set other than the continuing property record which contains information concerning the number of feet of in-service Underground conduit on Evergy MISSOURI METRO's system, provide the number in service, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (c) For any data set other than the continuing property record which contains information concerning the number of feet of stored or warehoused Underground conduit, provide the number stored or warehoused, for each year 2013 - 2023 as of yearend, or the most current values available for the current year.
35	106	Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected segments of underground conduit, and determine the voltages at which it supports operations.
38	109	(a) Please provide the number of feet of Overhead conductor on Evergy MISSOURI METRO's system, based on its continuing property record, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (b) For any data set other than the continuing property record which contains information concerning the number of feet of in-service Overhead conductor on Evergy MISSOURI METRO's system, provide the number in service, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (c) For any data set other than the continuing property record which contains information concerning the number of feet of stored or warehoused Overhead conductor, provide the number stored or warehoused, for each year 2013 - 2023 as of yearend, or the most current values available for the current year.

39	110	Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected segments of overhead conductor operating at each of the most common voltages served, and determine which retirement units or plant characteristics are utilized.
40	111	Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to determine how many miles of overhead conductor operate at each of the most common voltages served, and determine which retirement units or plant characteristics are utilized.
43	114	Please provide the number of feet of Underground conductor on Evergy MISSOURI METRO's system, based on its continuing property record, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (b) For any data set other than the continuing property record which contains information concerning the number feet of in-service Underground conductor on Evergy MISSOURI METRO's system, provide the number in service, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (c) For any data set other than the continuing property record which contains information concerning the number of feet of stored or warehoused Underground conductor, provide the number stored or warehoused, for each year 2013 - 2023 as of yearend, or the most current values available for the current year.
44	115	Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected segments of underground conductor operating at each of the most common voltages served, and determine which retirement units or plant characteristics are utilized.
48	119	(a) Please provide the number of Overhead devices on Evergy MISSOURI METRO's system, based on its continuing property record, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (b) For any data set other than the continuing property record which contains information concerning the number of in-service Overhead devices on Evergy MISSOURI METRO's system, provide the number in service, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (c) For any data set other than the continuing property record which contains information concerning the number of stored or warehoused Overhead devices, provide the number stored or warehoused, for each year 2013 - 2023 as of yearend, or the most current values available for the current year.
49	120	Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected Overhead devices, and determine the voltages at which it supports operations.

52	123	(a) Please provide the number of Underground devices on Evergy MISSOURI METRO's system, based on its continuing property record, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (b) For any data set other than the continuing property record which contains information concerning the number of in-service Underground devices on Evergy MISSOURI METRO's system, provide the number in service, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (c) For any data set other than the continuing property record which contains information concerning the number of stored or warehoused Underground devices, provide the number stored or warehoused, for each year 2013 - 2023 as of yearend, or the most current values available for the current year.
53	124	Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected Underground devices, and determine the voltages at which it supports operations.
56	127	(a) Please provide the number of the locations at which distribution infrastructure operating at a primary voltage utilized by a single customer occurs on Evergy MISSOURI METRO's system. (b) Please identify Evergy MISSOURI METRO's estimate of the number of customer locations at which distribution infrastructure operating at a primary voltage is utilized by a single customer. (c) Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected locations where distribution infrastructure operates at a primary voltage utilized by a single customer, and determine the associated property units and quantities. (d) What is the name and title of the Evergy MISSOURI METRO employee or contractor most familiar with the distribution infrastructure operating at a primary voltage utilized by a single customer selected for new installation of distribution infrastructure operating at a primary voltage utilized by a single customer? (e) What is the name and title of the Evergy MISSOURI METRO employee or contractor most familiar with the distribution infrastructure operating at a primary voltage utilized by a single customer selected for replacement installation of distribution infrastructure operating at a primary voltage utilized by a single customer?
60	131	(a) For account 370 (meters) and each subaccount, separately, please provide Evergy MISSOURI METRO's gross plant, depreciation reserve, net plant, and depreciation expense for each year 2013 - 2023, year-end balance, or most current balance available for the current year. (b) Please provide annual expense recorded to account 586 (meter expenses) and any subaccounts, separately, for each year 2013 - 2023 as of yearend, or the most current value available for the current year. (c) Please provide annual expense recorded to account 596 (maintenance of meters) and any subaccounts, separately, for each year 2013 - 2023 as of yearend, or the most current value available for the current year.
61	132	Is Evergy able to identify meter costs by voltage? If so, please provide the meter costs by voltage for Evergy MISSOURI METRO as of July 1, 2023, and as of November 1, 2023.

64	135	(a) Please provide the number of meters on Evergy MISSOURI METRO's system, based on its continuing property record, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (b) For each other system in which the quantity of operating meters on Evergy MISSOURI METRO's system is contained, for each year 2013 - 2023 as of yearend, or the most current values available for the current year, please provide the quantity of operating meters. (c) For each other system in which the quantity of warehoused or stored meters on Evergy MISSOURI METRO's system is contained, for each year 2013 - 2023 as of yearend, or the most current values available for the current year, please provide the quantity of warehoused or stored meters.
65	136	(a) By retirement unit name and physical characteristics, which meters currently in service at Evergy MISSOURI METRO are capable of obtaining reactive demand readings? (b) By retirement unit name and physical characteristics, which meters currently in service at Evergy MISSOURI METRO are not capable of obtaining reactive demand readings? (c) For which rate codes at Evergy MISSOURI METRO can Evergy MISSOURI METRO's billing system obtain and retain reactive demand readings?
66	137	(a) Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected commercial customers to determining the retirement unit of the meter.(b) Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected industrial customers to determining the retirement unit of the meter. (c) Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected residential customers to determining the retirement unit of the meter.

67	138	(a) How many meters for new service have been installed by Evergy MISSOURI METRO in each year 2018 - 2023? (b) What is the most frequently installed meter installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential customers in a subdivision? Please provide physical description, retirement unit name, and average cost per unit per year. (c) What is the most frequently installed meter installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential single family customers not in a subdivision? Please provide physical description, retirement unit name, and average cost per unit per year. (d) What is the most frequently installed meter installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential multi-family customers with less than 5 units. Please provide physical description, retirement unit name, and average cost per meter per year. (e) What is the most frequently installed meter installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential multi-family customers with more than 5 but less than 15 units. Please provide physical description, retirement unit name, and average cost per meter per year. (f) What is the most frequently installed meter installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential multi-family customers with more than 15 units. Please provide physical description, retirement unit name, and average cost per meter per year. (g) What are the five most frequently installed meters installed by Evergy MISSOURI METRO in each year 2018 - 2023 for stand-alone commercial customers receiving single phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common meters, please describe those characteristics. (h) What are the five most frequently installed meters installed by Evergy MISSOURI METRO in each year 2018 - 2023 for stand-alone commercial customers receiving multi-phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common meters, please describe those characteristics. (i) What are the five most frequently installed meters installed by Evergy MISSOURI METRO in each year 2018 - 2023 for stand-alone industrial customers receiving single phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common meters, please describe those characteristics. (j) What are the five most frequently installed meters installed by Evergy MISSOURI METRO in each year 2018 - 2023 for stand-alone industrial customers receiving multi-phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common meters, please describe those characteristics. (k) What are the five most frequently installed meters installed by Evergy MISSOURI METRO in each year 2018 - 2023 for multiple commercial customers sharing a line transformer receiving single phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common meters, please describe those characteristics. (l) What are the five most frequently installed meters installed by Evergy MISSOURI METRO in each year 2018 - 2023 for multiple commercial customers sharing a line transformer receiving multi-phase service. Please provide physical descriptions,

		retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common meters, please describe those characteristics.(m) What are the five most frequently installed meters installed by Evergy MISSOURI METRO in each year 2018 - 2023 for multiple industrial customers sharing a line transformer receiving single phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common meters, please describe those characteristics. (n) What are the five most frequently installed meters installed by Evergy MISSOURI METRO in each year 2018 - 2023 for multiple industrial customers sharing a line transformer receiving multi-phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common meters, please describe those characteristics.

69	140	(a) Is Evergy MISSOURI METRO currently capable of providing the total number of customers served on any given rate code on the first day of the month and the last day of the month? (b) Please identify the rate codes for which Evergy MISSOURI METRO can provide the total number of customers served on the first day of the month and the last day of the month. (c) Please identify the rate codes for which Evergy MISSOURI METRO cannot provide the total number of customers served on the first day of the month and the last day of the month. (d) Is Evergy MISSOURI METRO currently capable of providing, by rate code, the total number of customers served on the first day of each applicable billing cycle and the last day of each billing cycle? (e) Please identify the rate codes for which Evergy MISSOURI METRO can provide, by rate code, the total number of customers served on the first day of each applicable billing cycle and the last day of each billing cycle. (f) Please identify the rate codes for which Evergy MISSOURI METRO cannot provide, by rate code, the total number of customers served on the first day of each applicable billing cycle and the last day of each billing cycle. (g) For each rate code for which Evergy MISSOURI METRO can provide the information, please provide, by rate code, the total number of customers served on the first day of each applicable billing cycle and the last day of each billing cycle, for each applicable billing cycle, for the billing months of July 2023 and October 2023. Please specify billing cycle dates. (h) What is Evergy MISSOURI METRO's estimate of the cost to provide the total number of customers served on any given rate code on the first day of the month and the last day of the month?
70	141	(a) Is Evergy MISSOURI METRO currently capable of providing the total number of customers served on any given rate code that are billed based on AMI metering versus non-AMI metering? (b) Please identify the rate codes for which Evergy MISSOURI METRO can provide the total number of customers that are billed based on AMI metering versus non-AMI metering. (c) Please identify the rate codes for which Evergy MISSOURI METRO cannot provide the total number of customers that are billed based on AMI metering versus non-AMI metering. (d) For each rate code for which Evergy MISSOURI METRO can provide the information, please provide the total number of customers served billed based on AMI metering versus non-AMI metering for the calendar month of July 2023, the calendar month of October 2023, the billing month of July 2023, and the billing month of October 2023. (d) What is Evergy MISSOURI METRO's estimate of the cost to provide the total number of customers served on any given rate code that are billed based on AMI metering versus non-AMI metering? (e) What is Evergy MISSOURI METRO's estimate of the cost to provide the total number of customers served on any given rate code that are billed based on AMI metering versus non-AMI metering, at each voltage at which service is available on that rate code?

73	144	(a) Using 15 minute interval data to establish customer NCP, for each Evergy MISSOURI METRO rate code, please provide the sum of customer NCP by rate code for each month of 2021, 2022, and 2023 where NCP is measured between the hours of 6 am and 8 pm only. (b) Using 15 minute interval data to establish customer NCP, for each Evergy MISSOURI METRO rate code, please provide the sum of customer NCP by rate code for each month of 2021, 2022, and 2023 where NCP is measured between the hours of 6 am and 10 am only. (c) Using 15 minute interval data to establish customer NCP, for each Evergy MISSOURI METRO rate code, please provide the sum of customer NCP by rate code for each month of 2021, 2022, and 2023 where NCP is measured between the hours of 2 pm and 9 pm only. (d) What is Evergy MISSOURI METRO's estimate of the cost to provide, using 15 minute interval data to establish customer NCP, for each Evergy MISSOURI METRO rate code, the sum of customer NCP by rate code for each month of 2021, 2022, and 2023 where NCP is measured between the hours of 2 pm and 9 pm only?
74	145	(a) Please provide for each rate code 100 individual customers' hourly data for the years 2021, 2022, and 2023. If a given rate code has less than 100 customers, please provide this information for each customer on that rate code. (b) What is Evergy MISSOURI METRO's estimate of the cost to provide for each rate code 100 individual customers' NCP based on 15 minute hourly data for each month in the years 2021, 2022, and 2023, separately, for each of the following time periods (1) 6 am - 8 pm; (2) 6 am and 10 am; and (3) 2 pm and 9 pm?
75	146	(a) Please identify the annual 15 minute NCP of each customer on each rate code for each month of each year 2021, 2022, and 2023. Please provide only the following information regarding these NCPs at this time: (1) the sum of NCPs by month by rate code. (2) the cumulative frequency of NCP by month by rate code in tranches of 2 MW for residential and small general rate codes, and (3) the cumulative frequency of NCP by month by rate code in tranches of 20 MW for rate codes other than residential, small general service, and lighting. (b) What is Evergy MISSOURI METRO's estimate of the cost to identify the annual 15 minute NCP of each customer on each rate code for each month of each year 2021, 2022, and 2023?
77	148	“Bright lines”: (1) Please confirm that Evergy MISSOURI METRO has stated an intention to pursue "bright lines" demarcation of its rate codes and/or rate schedules. (2) Please fully explain what is meant by Evergy MISSOURI METRO's "bright lines," demarcations. (3) Please provide Evergy MISSOURI METRO's "bright lines" demarcations that are currently under consideration by customer NCP or other applicable defining characteristic.