

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

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

**LIST OF ISSUES, ORDER OF OPENING STATEMENTS,
LIST AND ORDER OF WITNESSES, AND
ORDER OF CROSS-EXAMINATION**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, on its own behalf, and respectfully submits the following *List of Issues, Order of Opening Statements, List and Order of Witnesses, and Order of Cross-Examination*:

LIST OF ISSUES

1. What is Evergy Missouri Metro, Inc. d/b/a Evergy Missouri Metro’s (“Evergy Missouri Metro”) and Evergy Missouri West, Inc., d/b/a Evergy Missouri West’s (“Evergy Missouri West”) estimate of the cost to provide line transformer costs and expenses by rate code?
 - a. Should the Commission order production of line transformer costs and expenses by rate code as described in Stipulation provision 1 at that estimated cost?

2. What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to provide primary distribution costs and expenses by voltage?
 - a. Should the Commission order production of primary distribution costs and expenses by voltage as described in Stipulation provision 1 at that estimated cost?

3. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide secondary distribution costs and expenses by voltage?
 - a. Should the Commission order production of secondary distribution costs and expenses by voltage as described in Stipulation provision 1 at that estimated cost?
4. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide primary voltage service drop costs and expenses?
 - a. Should the Commission order production of primary voltage service drop costs and expenses as described in Stipulation provision 1 at that estimated cost?
5. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide line extension costs, expenses, and contributions by rate code and voltage?
 - a. Should the Commission order production of line extension costs, expenses, and contributions by rate code and voltage as described in Stipulation provision 1 at that estimated cost?
6. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide meter costs by voltage and rate code?
 - a. Should the Commission order production of meter costs by voltage and rate code as described in Stipulation provision 1 at that estimated cost?
7. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide 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. Should the Commission order production of the total number of customers served on each rate schedule, for each rate code, on the first day of the month and the last day of the month as described in Stipulation provision 2 at that estimated cost?

8. Customer counts

a. Total customer counts: What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide 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?

i. Should the Commission order production, for each rate schedule on which customers may take service at various voltages of the number of customers served at each voltage on the first day of the month and the last day of the month as described in Stipulation provision 2a at that estimated cost?

b. Counts of AMI metered customers: What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide 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?

i. Should the Commission order production of the number of customers served on each rate schedule, by rate code, on the first day of the month and the last day of the month for which interval meter readings are obtained as described in Stipulation provision 3 at that estimated cost?

c. Counts of AMI metered customers by voltage: What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide 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 for which interval meter readings are obtained?

i. Should the Commission order, for each rate code on which customers may take service at various voltages, production of the number of customers served at each voltage on the first day of the month and the last day of the month for which interval meter readings are obtained as described in Stipulation provision 3a at that estimated cost?

9. Customer hourly usage

a. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide for each rate code for which service is available at a single voltage, the sum of customers' interval meter readings, by interval?

i. Should the Commission order production for each rate code for which service is available at a single voltage, the sum of customers' interval meter readings, by interval as described in Stipulation provision 4 at that estimated cost?

b. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide 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?

i. Should the Commission order, for each rate code on which customers may take service at various voltages, production of the sum of

customers' interval meter readings, by interval and by voltage; as described in Stipulation provision 4a at that estimated cost?

c. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide 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?

i. Should the Commission order production of any applicable internal adjustments to customer interval data as necessary for the company's billing system to bill the interval data referenced in parts 4. and 4.a., if not internally applied; as described in Stipulation provision 5 at that estimated cost?

10. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide information the Commission may designate from time to time pertaining to certain customer subsets for more granular study?

a. Should the Commission order Evergy Missouri Metro's and Evergy Missouri West's to take steps to facilitate such production of information as described in Stipulation provision 6 at that estimated cost?

11. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to retain individual customer interval data for a minimum of 14 months where 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?

a. Should the Commission order such retention as described in Stipulation provision 7 at that estimated cost?

12. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to retain individual hourly data for use in providing bill-comparison tools for customers to compare rate alternatives?
 - a. Should the Commission order such retention of individual hourly data for use in providing bill-comparison tools for customers to compare rate alternatives as described in Stipulation provision 8a at that estimated cost?
13. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to retain coincident peak determinants for use in future rate proceedings?
 - a. Should the Commission order Evergy Missouri Metro and Evergy Missouri West to retain coincident peak determinants for use in future rate proceedings as described in Stipulation provision 8b at that estimated cost?
14. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide to Staff, upon request, the information described in part 1, related to distribution costs and expenses?
 - a. Should the Commission order production to Staff upon request of the distribution data described in Stipulation provision 1, as described in Stipulation provision 8c1 at that estimated cost?
15. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide to Staff upon request a minimum of 12 months of the data described in parts 2-5 (customer counts and interval usage by rate code)?
 - a. Should the Commission order production to Staff upon request a minimum of 12 months of the data described in parts 2-5 (customer counts and interval

usage by rate code) as described in Stipulation provision 8c2 at that estimated cost?

16. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide to Staff upon request 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)?
 - a. Should the Commission order production to Staff upon request such information as described in Stipulation provision 8c3 at that estimated cost?
17. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide to Staff upon request 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)?
 - a. Should the Commission order production to Staff upon request such information as described in Stipulation provision 8c4 at that estimated cost?
18. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide for purposes of general rate proceedings, 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.?
 - a. Should the Commission order production, for purposes of general rate proceedings, of 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. as described in Stipulation provision 8d at that estimated cost?

19. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide and 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?
 - a. Should the Commission order production and development of 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 as described in Stipulation provision 9 at that estimated cost?
20. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost for Evergy Missouri Metro and Evergy Missouri West to begin to retain and study data related to the reactive demand requirements of each rate code, and sample customers within each rate code?
 - a. Should the Commission order Evergy Missouri Metro and Evergy Missouri West to begin to retain and study data related to the reactive demand requirements of each rate code, and sample customers within each rate code as described in Stipulation provision 10 at that estimated cost?

Order of Opening Statements

1. Evergy
2. MEGC
3. OPC
4. Staff

List and Order of Witnesses

1. **Everygy**
 - a. Sean Riley
 - b. Julie Dragoo
 - c. Bradley D. Lutz
2. **OPC**
 - a. Geoff Marke, Ph.D.
3. **Staff**
 - a. Sarah Lange
 - b. Michael Stahlman
 - c. Kim Cox
 - d. J Luebbert

Order of Cross-Examination

1. **Everygy Witnesses:** MCEG, OPC, Staff
2. **Staff Witnesses:** OPC, MCEG, Everygy
3. **OPC Witnesses:** Staff, MCEG, Everygy

WHEREFORE, the Staff respectfully submit this *List of Issues, Order of Opening Statements, List and Order of Witnesses, and Order of Cross-Examination* in this case.

Respectfully submitted,

/s/ Carolyn H. Kerr

Missouri Bar # 45718
Senior Staff Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
573-751-5397 (Voice)
573-526-6969 (Fax)
Carolyn.kerr@psc.mo.gov

Attorney for Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 17th day of January, 2024, to all counsel of record.

/s/ Carolyn H. Kerr