

- 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;

Data Request No. 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;

Data Request No. 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;

Data Request No. 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 No. 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.

Data Request No. 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.

Data Request No. 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.

Data Request No. 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

Data Request No. 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.

2. Should the Company expend the funds to create and produce the data requested by Staff? What is the expected cost of creation and production of the data requested by Staff?

3. If the Commission orders the creation and production of the data requested by Staff, should the Commission also order the deferral of all costs for possible recovery in a future rate case?

4. Should the Commission provide guidance concerning rate design proposal development, and the Company's obligation to support the data needs of Staff when the data needs are beyond the needs of the Company and not associated with Company proposals, as recommended by Evergy witness Bradley D. Lutz?

5. Should the Commission order that this docket remain open for resolution of discovery disputes related to data provision, as recommended by Staff expert J Luebbert? Specifically, Staff recommended this docket be used as a means to resolve areas where Evergy asserts that it cannot provide requested data because production of this data would require Evergy to perform additional analysis to provide required data in a usable format.

6. Should the Commission order that this docket remain open for use as a discovery repository and forum for dispute resolution related to the provision of information to conduct a distribution system cost study, as recommended by Staff expert Sarah Lange?

7. Should the Commission order Evergy to have the discussions with Staff that Ms. Dragoo suggests in her direct testimony and to order Evergy to provide the data requested in 2, 3, and 4, which Evergy states is more reasonable and should only be provided with support from the Commission? To the extent that Evergy is unable to retrieve this information after a day, month, or billing cycle has passed, should Evergy retain that information so that it is available for use in future general rate cases?

8. Should the Commission direct Evergy to provide any usable hourly customer usage information by rate code along with the customer count information, and 15 minute on-peak period demand determinants by rate code for non-residential rate schedules, as recommended by Staff Witness Sarah L. K. Lange?

ORDER OF OPENING STATEMENTS

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

ORDER OF WITNESSES

1. Sean Riley (Evergy)
2. Julie Dragoo (Evergy)
3. Bradley D. Lutz (Evergy)
4. Geoff Marke (OPC)
5. Sarah Lange (Staff)
6. Michael Stahlman (Staff)
7. Kim Cox (Staff)
8. J Luebbert (Staff)

ORDER OF CROSS EXAMINATION

1. Evergy Witnesses: MECG, OPC, Staff
2. Staff Witness: OPC, MECG, Evergy
3. OPC Witness: Staff, MECG, Evergy

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorneys for Evergy Missouri Metro and
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served upon counsel for all parties on this 17th day of January 2024 by either e-mail or U.S. Mail, postage prepaid.

/s/ Roger W. Steiner _____

Roger W. Steiner