

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

In the Matter of Requests for Customer)
Account Data Production) **File No. EO-2024-0002**

**POSITION STATEMENT OF
EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST**

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”), and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) (collectively “Evergy” or “Company”), pursuant to the Commission’s Order Setting Procedural Schedule (“Order”) issued October 18, 2023 and files this Position Statement.

I. INTRODUCTION

A. IT IS PREMATURE FOR THE COMMISSION TO REQUIRE THE CREATION AND PRODUCTION OF THE DATA REQUESTED BY STAFF SINCE THE COMMISSION HAS NOT APPROVED A LONG-TERM RATE DESIGN PLAN FOR EVERGY OR THE OTHER ELECTRIC COMPANIES IN MISSOURI.

Before addressing the specific issues in this case, it is important to note that much of the data requested by Staff in this proceeding appears to be designed, in part, to support Staff’s long-term vision of electric rate design for the future. However, the Commission has not been presented with the Staff’s long-term vision for electric rate design, and the Commission has not adopted it as the policy of the State of Missouri. Nevertheless, Staff is essentially requesting that the Company expend large sums of money, devote many man-hours of effort, and utilize a large amount of information technology resources to provide data to support Staff’s long-term rate design vision. Evergy respectfully suggests that it is premature for the Commission to require the creation and production of the data requested by Staff in this case since the Commission has not determined that this enormous effort is required or cost-beneficial for future rate cases or rate design cases.

In informal meetings with the Staff, Staff has presented its long-term vision for electric rate design in two parts, one focused on non-residential rates and a second addressing all customer classes with a long-term view. In short, the Company is not able to endorse the Staff plans. There are aspects of the plans that represent material changes from existing rate structures and the impact to customers is unknown. Specifically, proposals related to elimination of customer classes or pricing based on location. There are also aspects that are forward-looking and speculative where future developments could impact the plan as proposed. Specifically, proposals related to distributed energy resource loads and revenue decoupling are problematic.

On the topics of rate modernization, the Company and Staff have had two meetings to explore the topic, and the Company has participated in the initial non-residential rate design workshop held by Ameren, resulting from Ameren's rate cases, File Nos. ER-2021-0240 and ER-2022-0337 rate cases. Regarding the meetings between the Company and Staff, these resulted from the ER-2022-0129/0130 rate cases and included representatives of the Midwest Energy Consumers Group ("MECG"). Staff provided a detailed walk-through of the nonresidential plan for the Company's consideration. Although the Company and MECG have not formally replied or offered details on our respective plans, the details shared by Staff have been helpful to shape rate design proposals being finalized for the upcoming Evergy Missouri West rate case. At this point, it is expected that proposals will be made by the Company to adjust non-residential customer charges and facility charges. Testimony will be offered concerning reactive demand, on-peak demand charges, and the hours-use energy charge structures, but Evergy will not suggest material changes within this case. The Company will not be supporting the adoption of voltage and infrastructure specific customer and facility charges without regard to class.

As it is expected these proposals will be fully examined in an upcoming rate case and additional views offered by other intervening parties, the Company recommends the Commission

delay ordering sweeping changes to the Company's systems and processes to accommodate Staff's long-term vision for rate design. Simply put, it is premature to require the creation and production of the data requested by Staff since the Commission has not endorsed and approved Staff's long-term plan for electric rate design in Missouri.

II. LIST OF ISSUES

1. Should the Commission order Evergy to create and produce the data requested in the direct testimony of Staff witness Sarah Lange in File Nos. ER-2022-0129 and ER-2022-0130 as detailed in witness Lange's direct testimony on p. 62, ln. 1 through p. 64, ln. 28? More specifically, should the Commission order Evergy to create and produce the following data requests contained in the direct testimony of Staff witness Sarah Lange:

Data Request No. 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 Request No. 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;

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.

EVERGY RECOMMENDATIONS WITH REGARD TO DATA REQUESTS

The Commission should not order Evergy to create and produce the information requested in Data Request No. 1. The information requested in Data Request No. 1 is cost-prohibitive and is unnecessary to support ratemaking now or expected in the future. Evergy estimates that the cost of complying with Data Request No. 1 is ** [REDACTED]

[REDACTED] **

ADDITIONAL SUPPORT FOR RECOMMENDATION

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.

The Commission should reject Data Request Nos. 9 and 10. Deployment of on-peak demand charges or changes to reactive demand charges have not been ordered for the Company by the Commission nor explored in any detail as part of a recent general rate proceeding.

ADDITIONAL SUPPORT FOR RECOMMENDATION

The Commission should reject Data Request Nos. 9 and 10 since there has been no policy determination by the Commission that the deployment of on-peak demand charges or changes to reactive demand charges are necessary and in the public interest. Currently, Evergy's 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 this data request related to reactive demand.

The Commission should provide guidance concerning each of the remaining data request items detailed on Schedule BDL-1. Data Request Nos. 2, 3, 4, and 8 should only be provided with support from the Commission to do so. Unless otherwise specified, the Company recommends these data should be provided no more than annually and only in years that do not include a general rate proceeding.

a. For Data Request No. 2, confirm appropriateness of the data requested and approve regulatory treatment for prompt Company recovery of expenditures to deliver the data requested.

b. For Data Request No. 3, confirm appropriateness of the data requested and approve regulatory treatment for prompt Company recovery of expenditures to deliver the data requested.

c. For Data Request No. 4, confirm appropriateness of the data requested and approve regulatory treatment for prompt Company recovery of expenditures to deliver the data requested.

d. For Data Request No. 5, confirm appropriateness of the data requested and approve regulatory treatment for prompt Company recovery of expenditures to deliver the data requested.

e. For Data Request No. 6, affirm that this is a prospective request and cannot be appropriately assessed at this time.

f. For Data Request No. 7, confirm the Company response is appropriate, satisfying the Data Request. Data Request No. 7, a data request detailing data retention timing, is already being done by the Company.

g. For Data Request No. 8a, confirm the Company response is appropriate, satisfying the Data Request.

h. For Data Request No. 8b, confirm the Company response is appropriate, satisfying the Data Request.

i. For Data Request No. 8(c)2, confirm the Company response is appropriate, satisfying the Data Request.

j. For Data Request No. 8(c)3, confirm appropriateness of the data requested and approve regulatory treatment for prompt Company recovery of expenditures to deliver the data requested.

k. For Data Request No. 8(c)4, confirm appropriateness of the data requested and approve regulatory treatment for prompt Company recovery of expenditures to deliver the data requested.

l. For Data Request No. 8(d), confirm the Company response is appropriate, satisfying the Data Request.

ADDITIONAL SUPPORT FOR RECOMMENDATION

The Company believes that these data requests could be provided at a cost, if the Commission orders it, and allows for the deferral of all costs associated with the creation and production of the data.

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?

EVERGY RESPONSE: No. The Commission should not order Evergy to expend the funds to create and produce the data requested by Staff. The expected cost of creation and production of the data requested by Staff is contained in the **CONFIDENTIAL Schedule BDL-1** attached to the Direct Testimony of Bradley D. Lutz (attached). The expected cost by Data Request is also summarized below and is considered **Confidential Information:**

**

Data Request No.

Estimated Cost

Data Request No. 1

Data Request No. 2

Data Request No. 3

Data Request No. 4

Data Request No. 5

Data Request No. 6

Data Request No. 7

Data Request No. 8a

8b

8c(1)

8c(2)

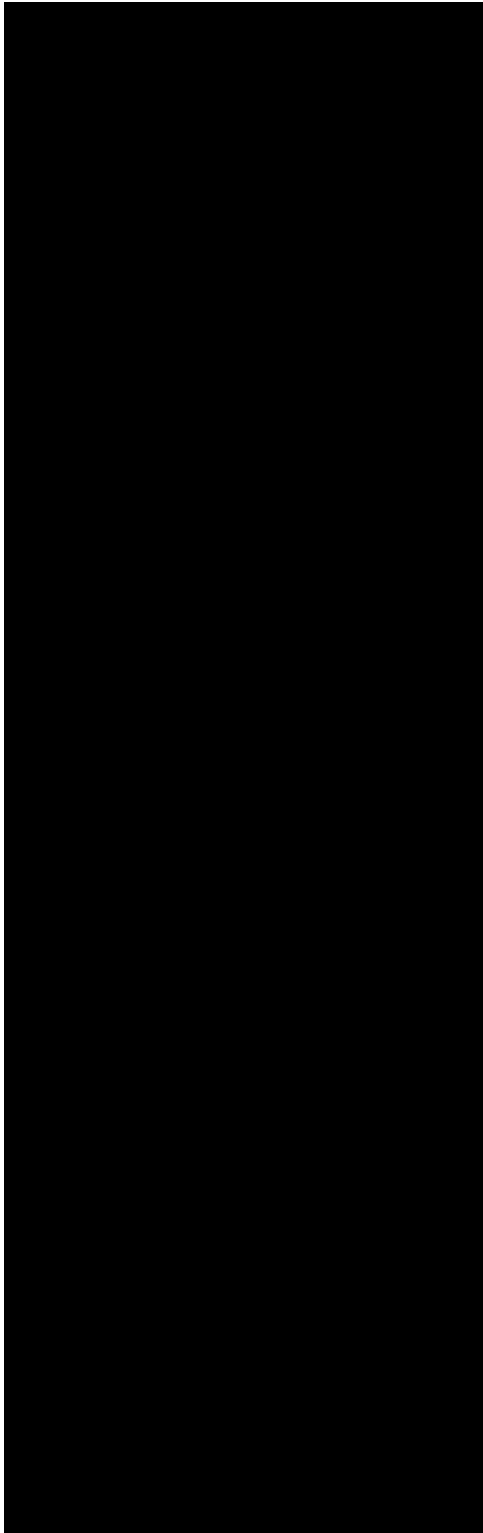
8c(3)

8c(4)

8d

Data Request No. 9

Data Request No. 10



**

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?

EVERGY RESPONSE: Yes. If the Commission orders the creation and production of the data requested by Staff, the Commission should also order the deferral of all costs for possible recovery in a future rate case. If the Commission supports this incremental work requested by Staff, the Company would request suitable regulatory treatment to recover the incremental costs in a future general rate proceeding. In other words, the Commission should explicitly authorize the deferral of all costs associated with any Order to create and produce the data that the Commission finds appropriate as a result of this proceeding. (Lutz Surrebuttal, p. 24).

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?

EVERGY RESPONSE: Yes. The Company seeks the Commission's direction on how rate design should be supported going forward. The requests received from Staff now and as part of prior rate cases are complex, costly and impactful to Company operations. Despite the assertions of Staff, having electronic systems with data does not automatically mean the data is easily retrieved in the desired format or combination, processed, or useful for analysis. Just because data exists does not mean that more data is always better.

The "law of diminishing returns" applies here. Need and value should be considered as well. Further, there is concern that the analysis sought by Staff may or may not be in line with Commission direction. Without question, rate design is impacted by policy-related decisions exercised by the Commission as much as data-related details. The Company believes it is important

for the Commission to consider these factors when deciding how much detail is valuable to support ratemaking. (Lutz Surrebuttal, p. 3)

Staff is seeking comprehensive access to customer data, possibly made available at all times and at a level of detail beyond the Company's need, for the purpose of supporting their independent recommendations for rate designs. They are seeking data access outside of general rate proceedings in the name of reducing regulatory lag. They are not seeking to affirm Company rate design proposals, but instead to pursue rate design plans in spite of Company recommendations.

The data requests by Staff to support these independent proposals have grown considerably and has moved beyond the data granularity and frequency the Company maintains for its own operational and ratemaking purposes. As a result, these requests would compel the Company to devote incremental effort, taxing a wide cross-section of corporate resources, to provide. (Lutz Surrebuttal, p. 7) Evergy does not believe the Staff approach is reasonable or appropriate.

Relatively recently, Staff has begun to offer rate design recommendations in general rate proceedings that are based solely on their views and are offered as an alternative to Company rate design recommendations. Prior to this time, Staff rate design recommendations consisted of proposed variations on the Company rate design proposal. This approach allowed for manageable rate design outcomes. However, under the new Staff approach, both the Company and Staff expend considerable effort to develop and support their respective proposals, then the Commission must choose between them, or in the case of the Company's last rate cases, issue an order implementing a different, hybrid rate design. (Lutz Surrebuttal, pp. 13-14)

Under the competing proposal approach, Staff is blurring the lines between oversight and management. This puts the Commission in the increasingly difficult position to choose. From the Company's perspective, the Staff and Commission have different roles to the benefit of the regulatory process. Consistent with case law, the Company manages the business, and the Staff

aids the Commission in providing its regulatory oversight provided by statute. The Commission in turn regulates the Company to ensure that customers receive safe and adequate utility services at just and reasonable rates. In exercising this regulation, the Commission may set policy or expectations for the Company to meet. Under these roles, it is not necessary that Staff have symmetric access to the Company's information systems. And Staff should not be dictating (especially over the Company's objection) the rate design that is to be offered by the Company to its customers. Therefore, the Company should not be required to expend significant sums to support a Staff proposed rate design which is radically different from the status quo which has not been approved by the Commission.

With respect to the current systems, the Company does take steps to make sure its systems can support Company ratemaking efforts including the provision of data to Staff and other parties in the course of general ratemaking. However, the complexity of Evergy's systems does not automatically lend itself to whatever independent analysis Staff is wanting to perform. (Lutz Surrebuttal, pp. 15-16).

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?

EVERGY RESPONSE TO ISSUE 5 AND 6: No. This docket should not remain open for the resolution of discovery disputes or as a discovery repository for information to conduct a

distribution cost study. The Company has concerns about this recommendation as it expects questions about data to persist in some form into future rate case proceedings or other filings before the Commission. Having this docket used for ongoing purposes, may create conflicts and complicate addressing issues within those dockets. Alternatively, the Company would prefer to use this case only to resolve the Commission examination of the need and cost to provide the Data Requests in Schedule BDL-1. If there are specific issues to be resolved applicable to this Commission examination, the Company believes using this docket for that purpose is appropriate. Ongoing issues should be resolved in the context of any future rate case proceedings or other filings before the Commission. If the Commission chooses to use this case to address issues going forward, the Company is not willing to continue to agree to the abbreviated data request response time agreed for the purposes of this docket only. Given the amount of discovery sought thus far by Staff, the Company's agreement to shorten the data request response time in this proceeding has resulted in a substantial burden on Evergy's personnel and has taken away the ability of these personnel to complete other important and necessary tasks for the Company and its customers.

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?

EVERGY RESPONSE: The Company is willing to join these discussions and retain the data as suggested by Staff, but requests that the Commission provide guidance concerning the intended timing of the provision. The Company supports this data exchange being part of a general rate proceeding, but is not willing to commit to ongoing work outside of a formal proceeding unless

the Commission requires it. The Company should not be obligated to provide this data frequently or ad hoc, outside of a general rate proceeding.

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?

EVERGY RESPONSE: No. The Commission should reject this recommendation. The Company does not bill customers with this level of detail and while this data does exist in the Evergy Meter Data Management, it is not stored in a format that allows for summation of the 15-minute intervals. As expressed in the Direct testimony of Julie Dragoo, this will require significant investment in systems to store, sum and deliver this data set. If the Commission supports the study of an on-peak demand, meaningful information could be achieved using the hourly demand which is used to support customer billing and is more readily available.

Respectfully submitted,

/s/ Roger W. Steiner

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

James M. Fischer, MBN 27543
Fischer & Dority, P.C.
2081 Honeysuckle Lane
Jefferson City, Missouri 65109
Phone: (573) 353-8647
jfischerpc@aol.com

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

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 18th day of January 2024 by either e-mail or U.S. Mail, postage prepaid.

/s/ Roger W. Steiner

Roger W. Steiner

DATA REQUEST ASSESSMENT SUMMARY

<u>DATA REQUEST #</u>	<u>DATA REQUESTED</u>	<u>AVAILABILITY ASSESSMENT</u>	<u>DELIVERABILITY ASSESSMENT</u>	<u>ESTIMATED COST TO PROVIDE</u>	<u>NOTES</u>
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

<u>DATA REQUEST #</u>	<u>DATA REQUESTED</u>	<u>AVAILABILITY ASSESSMENT</u>	<u>DELIVERABILITY ASSESSMENT</u>	<u>ESTIMATED COST TO PROVIDE</u>	<u>NOTES</u>
8	b. Retain coincident peak determinants for use in future rate proceedings.	AVAILABLE Eversource 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.		Eversource 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, Eversource 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. Eversource does not have a study design in place to inform the portion of the is data request related to reactive demand.

**Evergy Metro, Inc. d/b/a Evergy Missouri Metro and
Evergy Missouri West, Inc. d/b/a Evergy Missouri West**

Docket No.: EO-2024-0002

Date: January 18, 2024

CONFIDENTIAL INFORMATION

The following information is provided to the Missouri Public Service Commission under CONFIDENTIAL SEAL:

Document/Page	Reason for Confidentiality from List Below
Position Statement, p. 5, 9	3,4,5,6
Schedule BDL-1	3,4,5,6

Rationale for the “confidential” designation pursuant to 20 CSR 4240-2.135 is documented below:

1. Customer-specific information;
2. Employee-sensitive personnel information;
3. Marketing analysis or other market-specific information relating to services offered in competition with others;
4. Marketing analysis or other market-specific information relating to goods or services purchased or acquired for use by a company in providing services to customers;
5. Reports, work papers, or other documentation related to work produced by internal or external auditors, consultants, or attorneys, except that total amounts billed by each external auditor, consultant, or attorney for services related to general rate proceedings shall always be public;
6. Strategies employed, to be employed, or under consideration in contract negotiations;
7. Relating to the security of a company's facilities; or
8. Concerning trade secrets, as defined in section 417.453, RSMo.
9. Other (specify) _____.

Should any party challenge the Company’s assertion of confidentiality with respect to the above information, the Company reserves the right to supplement the rationale contained herein with additional factual or legal information.