

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

In the Matter of the Application of The Empire)
District Gas Company d/b/a Liberty Utilities)
for an Order Granting Billing Variances) **Case No. GE-2024-0201**
Related to the Company’s Implementation)
of its Customer First Program)

In the Matter of the Application of Liberty)
Utilities (Missouri Water) for an Order Granting) **Case No. WE-2024-0202**
Billing Variances Related to the Company’s)
Implementation of Customer First)

In the Matter of the Application of Liberty)
Utilities (Missouri Water) for an Order Granting) **Case No. SE-2024-0203**
Billing Variances Related to the Company’s)
Implementation of Customer First)

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), through counsel, and files its *Staff Recommendation* regarding the applications filed by Liberty Utilities (Missouri Water) LLC and The Empire District Gas Company d/b/a Liberty Utilities (collectively “Liberty” or “Company”) seeking variances from Commission Rules 20 CSR 4240-13.015(1)(C), 20 CSR 4240-13.020(6), and 20 CSR 4240-13.065(2). Staff states as follows:

1. On December 28, 2023, Liberty filed *Application for Temporary Variances, Request for Waivers, and Motion for Expedited Treatment* (“Applications”) with the Commission seeking variances from Commission Rules to implement its Customer First Program in February 2024 for its gas customers and for its Bolivar water and sewer customers. Commission Rule 20 CSR 4240-13.015(1)(C) states:

Billing period means a normal usage period of not less than twenty-six (26) nor more than thirty-five (35) days for a monthly billed customer...

Commission Rule 20 CSR 4240-13.020 (6) states:

A utility may bill its customers on a cyclical basis if the individual customer receives each billing on or about the same day of each billing period. If a utility changes a meter reading route or schedule which results in a change of nine (9) days or more of a billing cycle, notice shall be given to the affected customer at least fifteen (15) days prior to the date the customer receives a bill based on the new cycle.

Commission Rule 20 CSR 4240-13.065(2) states:

A utility filing an application for a variance with the commission shall mail, contemporaneously with the filing, copies of the application by first class mail to the newspaper with the largest circulation in each county within the utility's service area affected by the variance...

2. On December 28, 2023, the Commission ordered Staff to either file recommendations or status reports no later than January 11, 2024.

3. On January 11, 2024, Staff filed Status Reports indicating that it will file recommendations no later than January 30, 2024.

4. On January 11, 2024, the Commission approved Staff's request and ordered Staff to file its Recommendation no later than January 30, 2024.

5. Staff, having reviewed Liberty's Applications, submits its Recommendations in the accompanying Memorandum as Appendix A and recommends that the Commission grants the variances with conditions. In file number GE-2024-0046, Liberty requested the same variances that are requested in these cases for its Midstates Natural Gas ("MNG") subsidiary. That case also related to MNG's transition to the Customer First program. Staff recommends that the Commission grant the variances with the same conditions in file number GE-2024-0046, as reflected in Staff's Memorandum, with the following additional condition:

The Company shall file an update in this docket on its Customer First transition ninety (90) days after the transition occurs. That update shall include the following information:

- 1) A detailed description of all technical and customer service issues encountered during the transition, including what the issue was, how the issue occurred, the time period during which the issue persisted, and the resolution if applicable.
- 2) The number of customers who received a bill for a usage period of less than twenty-six (26) or more than thirty-five (35) days for a monthly billed customer, and the reason(s) why this occurred. This should be broken down by month for each month following the transition.
- 3) The number of customers whose bills were delayed following the transition and the reason for the delayed bill. This should be broken down by month for each month following the transition.
- 4) Start times, end times, and duration of the following outages/closures/downtimes as part of the Customer First transition: the data processing blackout, Liberty's walk-in and drive-thru office closure, the My Account downtime, the IVR downtime, and Kubra unavailability. Any unplanned or unexpected outages/closures/downtimes should be notated as such. The Company should also list all other outages/closures/downtimes that were not included in this list but related to the Customer First transition.

WHEREFORE, Staff recommends that the Commission grant Liberty's requested variances from 20 CSR 4240-13.015(1)(C), 20 CSR 4240-13.020(6), and 20 CSR 4240-13.065(2) along with conditions outlined above and in Appendix A.

Respectfully submitted,

/s/ Ron Irving

Ron Irving
Senior Counsel
Missouri Bar No. 56147
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
573-751-8702 (Voice)
573-751-9285 (Fax)
Ron.Irving@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been electronically mailed to all parties and/or counsel of record on this 30th day of January, 2024.

/s/ Ron Irving

MEMORANDUM

TO: Missouri Public Service Commission
Official Case File, Case Nos. GE-2024-0201, WE-2024-0202, and SE-2024-0203
The Empire District Gas Company d/b/a Liberty Utilities
Liberty Utilities (Missouri Water) LLC

FROM: Charles Tyrone Thomason - Senior Research/Data Analyst, Customer Experience

/s/ Contessa King 01/30/2024
Customer Experience Dept. / Date

SUBJECT: Staff Recommendation Regarding Liberty Utilities' Application for
Temporary Variances and Request for Waivers

DATE: January 30, 2024

OVERVIEW

On December 28, 2023, Liberty Utilities (Missouri Water) LLC and The Empire District Gas Company d/b/a Liberty Utilities (collectively "Liberty" or "Company") filed with the Missouri Public Service Commission ("Commission") an Application for Temporary Variances, Request for Waivers, and Motion for Expedited Treatment. In its filing, Liberty requested temporary billing variances from Commission Rules 20 CSR 4240-13.015(1)(C) and 20 CSR 4240-13.020(6), as well as a variance from the newspaper requirement of 20 CSR 4240-13.065(2), in order to facilitate efforts to implement its Customer First Program in February 2024 for its gas customers and for its Bolivar water and sewer customers. To maintain its implementation timeline, Liberty also requested an expedited Commission Order as it anticipates needing the variance as soon as February 2024.

On December 28, 2023, the Commission ordered Staff to file a recommendation or a status report by January 11, 2024. Staff filed a status report on January 11, 2024, indicating its intent to file its recommendation by January 30, 2024.

Based upon its investigation and analysis of the variance request, Staff recommends that the Commission approve Liberty's request for a temporary variance from Commission Rules 20 CSR 4240-13.015(1)(C) and 20 CSR 4240-13.020(6) with the same conditions under which the Commission approved Liberty's variance request in Case No. GE-2024-0046¹ along with one additional condition.

¹ *Order Granting Variances*, October 4, 2024, Case No. GE-2024-0046.

THE APPLICATION

According to Liberty, it intends to implement a new technology platform known as Customer First in February 2024. Customer First includes a new billing system called SAP, which will replace Liberty's current system Customer Watch. Under the current system, Liberty reads most of its customer meters towards the end of any given month but delays billing customers for the reads until the following month.² SAP, however, requires meter readings to be received by the scheduled bill date or else it will automatically estimate the bill.

In order to convert its customers to the new billing system, Liberty has developed a "meter read transition plan" in order to gradually move meter read dates closer to the billing dates.³ According to Liberty, this plan does not contemplate deviation from the requirements of Commission Rules 20 CSR 4240-13.015(1)(C) and 20 CSR 4240-13.020(6). However, it seeks variances from the rules in case circumstances, such as equipment failure or severe weather, cause unexpected issues.⁴ Commission Rule 20 CSR 4240-13.015(1)(C) defines a "billing period" as "a normal usage period of not less than twenty-six (26) nor more than thirty-five (35) days for a monthly billed customer." Commission Rule 20 CSR 4240-13.020(6) states:

A utility may bill its customers on a cyclical basis if the individual customer receives each billing on or about the same day of each billing period. If a utility changes a meter reading route or schedule which results in a change of nine (9) days or more of a billing cycle, notice shall be given to the affected customer at least fifteen (15) days prior to the date the customer receives a bill based on the new cycle.

In August 2023, Liberty requested the same variances for its Midstates Natural Gas ("MNG") subsidiary in Case No. GE-2024-0046. That case also pertained to Liberty's transition to Customer First, and was similar in substance to the present case. The Commission granted the variances with the following conditions:

A. In its next general rate case, Liberty will provide each tariffed rate class billing determinants (customer usage, number of bill and number of customers) by month, cycle with cycle dates that were utilized for billing purposes, and season (for the residential firm service, provide the first 30 Ccf and over 30 Ccf) to Staff in the following format: raw billing determinants, any and all adjustments separately (for proration, season, or any other reason) that were made to raw billing determinants, and the ending billing determinants. The ending monthly billing determinants should be the billing determinants Liberty utilizes to conduct its revenue requirement analysis in its general rate case.

² Liberty's billing cycles vary based on the meter read date and the billing date.

³ Liberty describes this plan in paragraphs 12-18 of its Application.

⁴ Company Response to Staff Data Request No. 0004.

B. Liberty's tariff sheet P.S.C. MO. No. 2, 1st Revised Sheet No. 20 allows for the Company to collect a \$15 charge for a "Check tendered to the Company which is dishonored for reasons other than bank error," which Staff believes could apply to failed auto pay withdrawals due to insufficient funds. The Company shall waive this fee for failed auto pay withdrawals for a period of 90 days after the transition.

C. Liberty shall waive late fees for an additional thirty (30) days. A 90-day period will allow for one new normal billing cycle to take place after the transition, allowing Liberty to verify that any issues with the transition have been resolved.

In addition, the Commission ordered the Company to update its website to reflect the mailed letters and to hold harmless autopay customers who incur overdraft and over-the-limit fees by financial institutions and credit card companies as a result of the billing transition. Liberty proposes to adopt the same conditions for the present case.

CUSTOMER IMPACT

Staff submitted several data requests ("DR" or "DRs") to Liberty to obtain further information regarding the current case and to obtain a status report on MNG's Customer First implementation. Staff also attended a meeting with the Company on January 22, 2024 where the Company presented its transition plans.

According to Liberty, it has 43,596 gas customers, 4,654 water customers, and 4,794 wastewater/sewer customers who will be impacted by the upcoming changes. Unlike MNG's transition, under the proposed meter read transition plan no customers will receive a bill for a billing period of less than twenty-six (26) days or more than thirty-five (35) days if all goes according to plan.⁵ There will be a data processing blackout period for the period of February 6-12, 2024⁶, and all Liberty walk-in offices and drive-thrus will be closed February 12-23, 2024.

Liberty has implemented what it refers to as a "robust customer outreach plan" to inform its customers of the implementation of Customer First and the anticipated effects. It has added a landing page to its website highlighting changes the customer will see, along with a home page website alert with a link to the landing page.⁷ Additionally, January bills were mailed with a bill insert providing information about the other changes that customers will experience as a result of the Customer First implementation, including a new account number and a new bill appearance.

⁵ See Schedule A for gas customers and Schedule B for Bolivar water and sewer customers.

⁶ Liberty's Application states that the blackout will begin on February 5, but in the January 22, 2024 meeting the Company indicated that the blackout would begin on February 6.

⁷ The dedicated landing page can be seen here: [New Customer Experience - Residential - Central - Liberty \(libertyutilities.com\)](https://libertyutilities.com)

Liberty will also include information about the implementation of Customer First in its monthly-emailed customer newsletters for January, and intends to send a letter by mail to every affected customer ahead of the February bill and the same letter by email to customers with email addresses on file. Finally, Liberty will communicate with its larger, non-residential customers outlining the changes that they can expect a few weeks in advance of the transition.⁸

In its Application, Liberty stated its intent to take the following steps to alleviate customer impacts: (a) waive any late fees for customers who need more time to pay and grant more time to any customer who requests a later date; (b) suspend any collection activities for all customers during this transition; (c) send letters and conduct other outreach efforts to inform customers regarding changes due to this system transition, including changes to their billing; and (d) calibrate the budget billing installment amount based on the usual 12-month usage history for any customer wishing to enroll in budget billing. Liberty also stated its agreeability to implementing the same conditions that were mandated in the Commission's Order approving the GE-2024-0046 variance. Staff agrees that these conditions remain prudent in order to mitigate adverse impact to customers during the Customer First transition period, with the exception of the website changes which are unnecessary.

MNG's CUSTOMER FIRST IMPLEMENTATION

As noted above, Liberty's request is similar to its request for MNG in Case No. GE-2024-0046. According to Liberty, the Customer First implementation for MNG is complete and most post-implementation issues have been resolved. Staff reviewed Liberty's descriptions of the major issues and how the Company intends to mitigate them for the next transition.⁹ It also made inquiries at the meeting.

Sales Tax

Liberty encountered a few situations where sales tax calculations were not appropriately incorporated into customers' bills based on the customer's location. Tax was either applied at an incorrect rate for the city jurisdiction or not applied at all. Liberty has worked with its sales tax vendor One Source and modified the application that it uses to track sales tax changes in order to prevent reoccurrences.

Franchise Fee

Liberty encountered a situation where four franchise fees were incorrectly configured at 0% but should have been at 5%, and three areas configured at 5% should have been at 0%. As a result,

⁸ Company response to Staff Data Request No. 0001. Staff has reviewed the website, bill insert, a draft of the mailed letter, and flyer. It was informed at the meeting that the letter will also include information about the office closure.

⁹ Company response to Staff Data Request Nos. 0005 and 0006.

twenty-one (21) customers were overbilled and approximately 1,000 customers were under-billed. The overbilled customers were rebilled at the correct percentage, and the under-billed customers were not back-billed. Liberty will conduct additional validations on prices and rates to prevent reoccurrence.

Account Blocks

When potential issues are identified, Liberty has the ability to block accounts from generating a bill until the issue is resolved. During the MNG Customer First implementation, these blocks were not removed in a timely manner after the issue was resolved, resulting in billing delays. Liberty has stated that it intends to remove blocks more quickly going forward.

Landlord Agreement Accounts

After the MNG implementation, Liberty discovered that 357 inactive locations with landlord agreements¹⁰ were incorrectly activated, resulting in erroneous billing. The billing was reversed and Liberty notified affected customers that they do not owe the resulting charges. Going forward, Liberty will check the status of inactive landlord agreements to prevent reoccurrence.

Energy Assistance Payment

As part of the Customer First implementation, the Energy Assistance process of entering and accepting agency pledges and payments was changed to a new program. When pledges and payments began coming in, the Company was given a cross-reference file to convert customers' account numbers from their legacy accounts to their new SAP account number. Liberty discovered that in some cases the cross reference file used was incorrect, affecting fifty (50) customers. Once Liberty realized that the information was incorrect, the correct reference file was obtained and the situation resolved. Going forward, Liberty intends to validate files to avoid this issue.

Transfer Service Orders

Liberty discovered that there was a miscommunication about MNG's system conversion blackout. As a result, 500 service orders to transfer customers in or out of locations were not completed prior to the blackout. These orders were therefore delayed until after the conversion was complete. Liberty has added extra support to process existing service orders before the system blackout and after the conversion. During the blackout, service order information will be gathered on paper and entered into the system once it is live.

Call Volume

Through its review of MNG's call center metrics, which Liberty provides to Staff as ordered in Case Nos. GM-2000-312, GR-2006-0387, and GM-2012-0037, Staff observed unprecedented call volume in the two months following MNG's Customer First implementation. When asked about

¹⁰ Landlord agreements are agreements for the landlord to assume responsibility for services when a tenant moves out

the common reasons that customers were calling, Liberty responded with most of the issues above. In addition, it cited bill delays and multiple bills received during a short period of time, which were planned aspects of MNG's transition. In the meeting with Staff, Liberty noted that it will be preparing for additional calls by increasing staffing levels (including using personnel from other regions). It will also continue to use an outsourced call center called CP360 as well as its Call Back Feature for customers with an expected hold time of more than three (3) minutes.

STAFF'S CONCERNS

Staff has reviewed the Company's descriptions of the major issues from the MNG implementation, and how the Company intends to mitigate them for the next transition, and has no additional recommendations at this time with regards to those issues. However, Staff does have concerns regarding Liberty's plans for the current implementation that it wishes to bring to the Commission's attention.

Outages and Downtimes

As mentioned in Liberty's Application, the conversion process will include a data processing blackout period from February 5 to February 12, 2024 while the Company converts from the old billing system to the new one. Liberty provided further details during its meeting with Staff. The blackout period is now scheduled to take place from February 6 to February 12, 2024. During the blackout period customer service representatives ("CSRs") will have read-only access to the legacy system and will be unable to access the new system. Liberty intends for CSRs to create handwritten payment receipts and fill out handwritten forms for every service order and request during the blackout period. They will be entered into the new system once it goes live.

Staff also learned during its meeting with Liberty that, following the data processing blackout, Liberty's walk-in and drive-thru offices will be closed for two weeks. Customers will still be able to pay bills by drop box or by phone. According to Liberty, this closure will allow for more focus to be placed on posting payments and entering other handwritten data generated during the blackout, on answering calls, and on acclimating CSRs to the new system. The Company has posted notice of the closure in its offices and on its website. Although the closures are tentatively scheduled for February 12-23, 2024, these dates are not finalized and thus have not yet been added to the letter that will be mailed to customers in early February.

Alongside this closure, Staff learned that some of Liberty's affiliate payment locations will be changing. Liberty has not yet announced details regarding these upcoming changes to its customers.

Additionally, Staff learned that customers' ability to interact with My Account, Liberty's third-party payment vendor, and the IVR (Interactive Voice Response) will be disrupted during the

transition. My Account, which is the online portal through which Liberty's customers are able to access their accounts, will be unavailable to customers from February 7 to February 23, 2024. Liberty's third-party payment vendor, Kubra, will be unavailable from 7:45 pm on February 6th until February 12th when SAP goes live. Kubra allows Liberty's customers to pay their bill online or by phone. Finally, the IVR system will be unavailable for multiple short periods of time during the transition. Customers will be unable to self-serve for outage orders or account look-up, and calls will immediately be sent to a CSR. Liberty is unable to say when these outages will take place, but anticipates several short periods lasting no more than a few hours.

The data processing blackout is not unique to this case. MNG also had a blackout period that lasted for a longer period of time, from September 30 to October 9, 2023. However, the blackout in this case is followed by a two-week office closure and will apparently coincide with other downtimes which, to Staff's knowledge, did not occur for the MNG transition. These additional downtimes present numerous obstacles to customers wanting to access their account and pay their bills even before taking into account the changes Customer First will bring.¹¹ This is especially concerning considering the Company was unable, as of January 22, 2024, to present a detailed timeline of processes it anticipates to enact within a matter of weeks. Even if Liberty is able to excel at ensuring its paper records for payments, orders, and service requests during the blackout are sufficiently complete and properly entered into its new system at a later date, the potential overlap of downtimes could have a cumulative effect that significantly worsens the customer experience.

CONCLUSION

In spite of its concerns, Staff believes that the requested temporary variances are warranted and recommends Commission approval, but with the following conditions that were ordered in the prior case as well as an additional condition:

1. In its next general rate case, Liberty will provide each tariffed rate class billing determinants (customer usage, number of bill and number of customers) by month, cycle with cycle dates that were utilized for billing purposes, and season (for the residential firm service, provide the first 30 Ccf and over 30 Ccf) to Staff in the following format: raw billing determinants, any and all adjustments separately (for proration, season, or any other reason) that were made to raw billing determinants, and the ending billing determinants. The ending monthly billing determinants should be the billing determinants Liberty utilizes to conduct its revenue requirement analysis in its general rate case.
2. Liberty's tariff sheets allow for the Company to collect a charge for returned checks in the

¹¹ Besides the affiliate payment locations, other such changes include new account numbers for all customers and a new bill design.

amount of \$20 for gas customers¹² and \$25 for Bolivar water¹³ and sewer¹⁴ customers. Staff believes this charge may apply to failed auto pay withdrawals due to insufficient funds. Staff recommends that the Company consider waiving this fee for auto pay withdrawals for a period of 90 days after the transition.

3. Liberty should waive late fees for at least ninety (90) days.
4. Staff recommends that the Company hold customers who autopay their bills who incur overdraft fees imposed by financial institutions and over-the-limit fees imposed by credit card companies that they would not have incurred but for Liberty changing when it charges for gas service harmless from those fees.
5. The Company shall file an update in this docket on its Customer First transition ninety (90) days after the transition occurs. That update shall include the following information:
 - 1) A detailed description of all technical and customer service issues encountered during the transition, including what the issue was, how the issue occurred, the time period during which the issue persisted, and the resolution if applicable.
 - 2) The number of customers who received a bill for a usage period of less than twenty-six (26) or more than thirty-five (35) days for a monthly billed customer, and the reason(s) why this occurred. This should be broken down by month for each month following the transition.
 - 3) The number of customers whose bills were delayed following the transition and the reason for the delayed bill. This should be broken down by month for each month following the transition.
 - 4) Start times, end times, and duration of the following outages/closures/downtimes as part of the Customer First transition: the data processing blackout, Liberty's walk-in and drive-thru office closure, the My Account downtime, the IVR downtime, and Kubra unavailability. Any unplanned or unexpected outages/closures/downtimes should be notated as such. The Company should also list all other outages/closures/downtimes that were not included in this list but related to the Customer First transition.

¹² P.S.C MO. NO. 2, 2nd Revised Sheet No. R-53.

¹³ P.S.C MO. NO. 15, Original Sheet No. 5.

¹⁴ P.S.C MO. NO. 14, 1st Revised Sheet No. 5.

Empire Transition Plan for Meter Reading - Missouri

| Town | Cycle | Route | December Read Date | December Bill Date | January Read Date | January Bill Date | January Read Days | February Read Date | February Bill Date | February Read Days | March Read Date | March Bill Date | March Read Days |
|----------------|-------|-------|--------------------|--------------------|-------------------|-------------------|-------------------|--------------------|--------------------|--------------------|-----------------|-----------------|-----------------|
| Clinton | 81 | 8101 | 30-Nov-2023 | 11-Dec-2023 | 3-Jan-2024 | 9-Jan-2024 | 34 | 2-Feb-2024 | 12-Feb-2024 | 30 | 7-Mar-2024 | 8-Mar-2024 | 34 |
| Deerfield | 81 | 8102 | 30-Nov-2023 | 11-Dec-2023 | 3-Jan-2024 | 9-Jan-2024 | 34 | 2-Feb-2024 | 12-Feb-2024 | 30 | 7-Mar-2024 | 8-Mar-2024 | 34 |
| Leeton | 81 | 8103 | 30-Nov-2023 | 11-Dec-2023 | 3-Jan-2024 | 9-Jan-2024 | 34 | 2-Feb-2024 | 12-Feb-2024 | 30 | 7-Mar-2024 | 8-Mar-2024 | 34 |
| Nevada | 81 | 8104 | 1-Dec-2023 | 11-Dec-2023 | 3-Jan-2024 | 9-Jan-2024 | 33 | 2-Feb-2024 | 12-Feb-2024 | 30 | 7-Mar-2024 | 8-Mar-2024 | 34 |
| Warrensburg | 81 | 8105 | 30-Nov-2023 | 11-Dec-2023 | 3-Jan-2024 | 9-Jan-2024 | 34 | 2-Feb-2024 | 12-Feb-2024 | 30 | 7-Mar-2024 | 8-Mar-2024 | 34 |
| Henrietta | 86 | 8601 | 30-Nov-2023 | 18-Dec-2023 | 4-Jan-2024 | 17-Jan-2024 | 35 | 7-Feb-2024 | 16-Feb-2024 | 34 | 12-Mar-2024 | 15-Mar-2024 | 34 |
| Lexington | 86 | 8602 | 30-Nov-2023 | 18-Dec-2023 | 4-Jan-2024 | 17-Jan-2024 | 35 | 7-Feb-2024 | 16-Feb-2024 | 34 | 12-Mar-2024 | 15-Mar-2024 | 34 |
| Richmond | 86 | 8604 | 30-Nov-2023 | 18-Dec-2023 | 4-Jan-2024 | 17-Jan-2024 | 35 | 7-Feb-2024 | 16-Feb-2024 | 34 | 12-Mar-2024 | 15-Mar-2024 | 34 |
| LaMonte | 82 | 8202 | 1-Dec-2023 | 12-Dec-2023 | 5-Jan-2024 | 10-Jan-2024 | 35 | 3-Feb-2024 | 12-Feb-2024 | 29 | 8-Mar-2024 | 11-Mar-2024 | 34 |
| Otterville | 82 | 8203 | 1-Dec-2023 | 12-Dec-2023 | 5-Jan-2024 | 10-Jan-2024 | 35 | 3-Feb-2024 | 12-Feb-2024 | 29 | 8-Mar-2024 | 11-Mar-2024 | 34 |
| Sedalia | 82 | 8204 | 1-Dec-2023 | 12-Dec-2023 | 5-Jan-2024 | 10-Jan-2024 | 35 | 3-Feb-2024 | 12-Feb-2024 | 29 | 8-Mar-2024 | 11-Mar-2024 | 34 |
| Smithton | 82 | 8205 | 1-Dec-2023 | 12-Dec-2023 | 5-Jan-2024 | 10-Jan-2024 | 35 | 3-Feb-2024 | 12-Feb-2024 | 29 | 8-Mar-2024 | 11-Mar-2024 | 34 |
| Brunswick | 83 | 8301 | 2-Dec-2023 | 13-Dec-2023 | 6-Jan-2024 | 11-Jan-2024 | 35 | 4-Feb-2024 | 13-Feb-2024 | 29 | 9-Mar-2024 | 12-Mar-2024 | 34 |
| Glasgow | 83 | 8302 | 2-Dec-2023 | 13-Dec-2023 | 6-Jan-2024 | 11-Jan-2024 | 35 | 4-Feb-2024 | 13-Feb-2024 | 29 | 9-Mar-2024 | 12-Mar-2024 | 34 |
| Keytesville | 83 | 8303 | 2-Dec-2023 | 13-Dec-2023 | 6-Jan-2024 | 11-Jan-2024 | 35 | 4-Feb-2024 | 13-Feb-2024 | 29 | 9-Mar-2024 | 12-Mar-2024 | 34 |
| Marshall | 83 | 8304 | 2-Dec-2023 | 13-Dec-2023 | 6-Jan-2024 | 11-Jan-2024 | 35 | 4-Feb-2024 | 13-Feb-2024 | 29 | 9-Mar-2024 | 12-Mar-2024 | 34 |
| Salisbury | 83 | 8305 | 2-Dec-2023 | 13-Dec-2023 | 6-Jan-2024 | 11-Jan-2024 | 35 | 4-Feb-2024 | 13-Feb-2024 | 29 | 9-Mar-2024 | 12-Mar-2024 | 34 |
| Platte City | 86 | 8603 | 3-Dec-2023 | 18-Dec-2023 | 4-Jan-2024 | 17-Jan-2024 | 32 | 8-Feb-2024 | 16-Feb-2024 | 35 | 12-Mar-2024 | 15-Mar-2024 | 33 |
| Tracy | 86 | 8605 | 3-Dec-2023 | 18-Dec-2023 | 4-Jan-2024 | 17-Jan-2024 | 32 | 8-Feb-2024 | 16-Feb-2024 | 35 | 12-Mar-2024 | 15-Mar-2024 | 33 |
| Weston | 86 | 8606 | 3-Dec-2023 | 18-Dec-2023 | 4-Jan-2024 | 17-Jan-2024 | 32 | 8-Feb-2024 | 16-Feb-2024 | 35 | 12-Mar-2024 | 15-Mar-2024 | 33 |
| Bigelow | 87 | 8701 | 3-Dec-2023 | 19-Dec-2023 | 7-Jan-2024 | 18-Jan-2024 | 35 | 9-Feb-2024 | 19-Feb-2024 | 33 | 14-Mar-2024 | 18-Mar-2024 | 34 |
| Craig | 87 | 8702 | 3-Dec-2023 | 19-Dec-2023 | 7-Jan-2024 | 18-Jan-2024 | 35 | 9-Feb-2024 | 19-Feb-2024 | 33 | 14-Mar-2024 | 18-Mar-2024 | 34 |
| Fairfax | 87 | 8703 | 3-Dec-2023 | 19-Dec-2023 | 7-Jan-2024 | 18-Jan-2024 | 35 | 9-Feb-2024 | 19-Feb-2024 | 33 | 14-Mar-2024 | 18-Mar-2024 | 34 |
| Forest City | 87 | 8704 | 3-Dec-2023 | 19-Dec-2023 | 7-Jan-2024 | 18-Jan-2024 | 35 | 9-Feb-2024 | 19-Feb-2024 | 33 | 14-Mar-2024 | 18-Mar-2024 | 34 |
| Fortescue | 87 | 8705 | 3-Dec-2023 | 19-Dec-2023 | 7-Jan-2024 | 18-Jan-2024 | 35 | 9-Feb-2024 | 19-Feb-2024 | 33 | 14-Mar-2024 | 18-Mar-2024 | 34 |
| Graham | 87 | 8706 | 3-Dec-2023 | 19-Dec-2023 | 7-Jan-2024 | 18-Jan-2024 | 35 | 9-Feb-2024 | 19-Feb-2024 | 33 | 14-Mar-2024 | 18-Mar-2024 | 34 |
| Langdon | 87 | 8707 | 3-Dec-2023 | 19-Dec-2023 | 7-Jan-2024 | 18-Jan-2024 | 35 | 9-Feb-2024 | 19-Feb-2024 | 33 | 14-Mar-2024 | 18-Mar-2024 | 34 |
| Maitland | 87 | 8708 | 3-Dec-2023 | 19-Dec-2023 | 7-Jan-2024 | 18-Jan-2024 | 35 | 9-Feb-2024 | 19-Feb-2024 | 33 | 14-Mar-2024 | 18-Mar-2024 | 34 |
| Mound City | 87 | 8709 | 3-Dec-2023 | 19-Dec-2023 | 7-Jan-2024 | 18-Jan-2024 | 35 | 9-Feb-2024 | 19-Feb-2024 | 33 | 14-Mar-2024 | 18-Mar-2024 | 34 |
| Oregon | 87 | 8710 | 3-Dec-2023 | 19-Dec-2023 | 7-Jan-2024 | 18-Jan-2024 | 35 | 9-Feb-2024 | 19-Feb-2024 | 33 | 14-Mar-2024 | 18-Mar-2024 | 34 |
| Rock Port | 87 | 8711 | 3-Dec-2023 | 19-Dec-2023 | 7-Jan-2024 | 18-Jan-2024 | 35 | 9-Feb-2024 | 19-Feb-2024 | 33 | 14-Mar-2024 | 18-Mar-2024 | 34 |
| Skidmore | 87 | 8712 | 3-Dec-2023 | 19-Dec-2023 | 7-Jan-2024 | 18-Jan-2024 | 35 | 9-Feb-2024 | 19-Feb-2024 | 33 | 14-Mar-2024 | 18-Mar-2024 | 34 |
| Tarkio | 87 | 8713 | 3-Dec-2023 | 19-Dec-2023 | 7-Jan-2024 | 18-Jan-2024 | 35 | 9-Feb-2024 | 19-Feb-2024 | 33 | 14-Mar-2024 | 18-Mar-2024 | 34 |
| Barnard | 88 | 8801 | 3-Dec-2023 | 20-Dec-2023 | 7-Jan-2024 | 19-Jan-2024 | 35 | 9-Feb-2024 | 20-Feb-2024 | 33 | 14-Mar-2024 | 19-Mar-2024 | 34 |
| Bolckow | 88 | 8802 | 3-Dec-2023 | 20-Dec-2023 | 7-Jan-2024 | 19-Jan-2024 | 35 | 9-Feb-2024 | 20-Feb-2024 | 33 | 14-Mar-2024 | 19-Mar-2024 | 34 |
| Clyde | 88 | 8803 | 3-Dec-2023 | 20-Dec-2023 | 7-Jan-2024 | 19-Jan-2024 | 35 | 9-Feb-2024 | 20-Feb-2024 | 33 | 14-Mar-2024 | 19-Mar-2024 | 34 |
| Conception | 88 | 8804 | 3-Dec-2023 | 20-Dec-2023 | 7-Jan-2024 | 19-Jan-2024 | 35 | 9-Feb-2024 | 20-Feb-2024 | 33 | 14-Mar-2024 | 19-Mar-2024 | 34 |
| Conception Jct | 88 | 8805 | 3-Dec-2023 | 20-Dec-2023 | 7-Jan-2024 | 19-Jan-2024 | 35 | 9-Feb-2024 | 20-Feb-2024 | 33 | 14-Mar-2024 | 19-Mar-2024 | 34 |
| Maryville | 88 | 8806 | 4-Dec-2023 | 20-Dec-2023 | 7-Jan-2024 | 19-Jan-2024 | 34 | 9-Feb-2024 | 20-Feb-2024 | 33 | 14-Mar-2024 | 19-Mar-2024 | 34 |
| Ravenwood | 88 | 8807 | 3-Dec-2023 | 20-Dec-2023 | 7-Jan-2024 | 19-Jan-2024 | 35 | 9-Feb-2024 | 20-Feb-2024 | 33 | 14-Mar-2024 | 19-Mar-2024 | 34 |
| Brookfield | 84 | 8401 | 4-Dec-2023 | 14-Dec-2023 | 7-Jan-2024 | 15-Jan-2024 | 34 | 6-Feb-2024 | 14-Feb-2024 | 30 | 11-Mar-2024 | 13-Mar-2024 | 34 |
| Bucklin | 84 | 8402 | 4-Dec-2023 | 14-Dec-2023 | 7-Jan-2024 | 15-Jan-2024 | 34 | 6-Feb-2024 | 14-Feb-2024 | 30 | 11-Mar-2024 | 13-Mar-2024 | 34 |
| Laclade | 84 | 8403 | 4-Dec-2023 | 14-Dec-2023 | 7-Jan-2024 | 15-Jan-2024 | 34 | 6-Feb-2024 | 14-Feb-2024 | 30 | 11-Mar-2024 | 13-Mar-2024 | 34 |
| Marceline | 84 | 8404 | 4-Dec-2023 | 14-Dec-2023 | 7-Jan-2024 | 15-Jan-2024 | 34 | 6-Feb-2024 | 14-Feb-2024 | 30 | 11-Mar-2024 | 13-Mar-2024 | 34 |
| Meadville | 84 | 8405 | 4-Dec-2023 | 14-Dec-2023 | 7-Jan-2024 | 15-Jan-2024 | 34 | 6-Feb-2024 | 14-Feb-2024 | 30 | 11-Mar-2024 | 13-Mar-2024 | 34 |
| Wheeling | 84 | 8406 | 4-Dec-2023 | 14-Dec-2023 | 7-Jan-2024 | 15-Jan-2024 | 34 | 6-Feb-2024 | 14-Feb-2024 | 30 | 11-Mar-2024 | 13-Mar-2024 | 34 |
| Chillicothe | 85 | 8501 | 4-Dec-2023 | 15-Dec-2023 | 7-Jan-2024 | 16-Jan-2024 | 34 | 6-Feb-2024 | 15-Feb-2024 | 30 | 11-Mar-2024 | 14-Mar-2024 | 34 |
| Chula | 85 | 8502 | 4-Dec-2023 | 15-Dec-2023 | 7-Jan-2024 | 16-Jan-2024 | 34 | 6-Feb-2024 | 15-Feb-2024 | 30 | 11-Mar-2024 | 14-Mar-2024 | 34 |
| Trenton | 85 | 8503 | 4-Dec-2023 | 15-Dec-2023 | 7-Jan-2024 | 16-Jan-2024 | 34 | 6-Feb-2024 | 15-Feb-2024 | 30 | 11-Mar-2024 | 14-Mar-2024 | 34 |
| Utica | 85 | 8504 | 4-Dec-2023 | 15-Dec-2023 | 7-Jan-2024 | 16-Jan-2024 | 34 | 6-Feb-2024 | 15-Feb-2024 | 30 | 11-Mar-2024 | 14-Mar-2024 | 34 |

Empire Transition Plan for Water Meter Reading - Bolivar, Missouri

| Cycle | Route | Read Type | December Read Date | December Bill Date | January Read Date | January Bill Date | January Read Days | February Read Date | February Bill Date | February Read Days | March Read Date | March Bill Date | March Read Days |
|-------|-------|-----------|--------------------|--------------------|-------------------|-------------------|-------------------|--------------------|--------------------|--------------------|-----------------|-----------------|-----------------|
| 37 | 3701 | AMR | 27-Dec-2023 | 15-Jan-2024 | 31-Jan-2024 | 15-Feb-2024 | 35 | 5-Mar-2024 | 15-Mar-2024 | 34 | 9-Apr-2024 | 15-Apr-2024 | 35 |
| 37 | 3701 | MR | 31-Dec-2023 | 15-Jan-2024 | 3-Feb-2024 | 15-Feb-2024 | 34 | 4-Mar-2024 | 15-Mar-2024 | 30 | 8-Apr-2024 | 15-Apr-2024 | 35 |
| 37 | 3702 | AMR | 27-Dec-2023 | 15-Jan-2024 | 31-Jan-2024 | 15-Feb-2024 | 35 | 5-Mar-2024 | 15-Mar-2024 | 34 | 9-Apr-2024 | 15-Apr-2024 | 35 |
| 37 | 3703 | AMR | 27-Dec-2023 | 15-Jan-2024 | 31-Jan-2024 | 15-Feb-2024 | 35 | 5-Mar-2024 | 15-Mar-2024 | 34 | 9-Apr-2024 | 15-Apr-2024 | 35 |
| 37 | 3704 | AMR | 27-Dec-2023 | 15-Jan-2024 | 31-Jan-2024 | 15-Feb-2024 | 35 | 5-Mar-2024 | 15-Mar-2024 | 34 | 9-Apr-2024 | 15-Apr-2024 | 35 |
| 37 | 3705 | AMR | 27-Dec-2023 | 15-Jan-2024 | 31-Jan-2024 | 15-Feb-2024 | 35 | 6-Mar-2024 | 15-Mar-2024 | 35 | 10-Apr-2024 | 15-Apr-2024 | 35 |
| 37 | 3705 | AMR | 31-Dec-2023 | 15-Jan-2024 | 3-Feb-2024 | 15-Feb-2024 | 34 | 5-Mar-2024 | 15-Mar-2024 | 31 | 9-Apr-2024 | 15-Apr-2024 | 35 |
| 37 | 3706 | AMR | 27-Dec-2023 | 15-Jan-2024 | 31-Jan-2024 | 15-Feb-2024 | 35 | 6-Mar-2024 | 15-Mar-2024 | 35 | 10-Apr-2024 | 15-Apr-2024 | 35 |
| 37 | 3706 | MR | 31-Dec-2023 | 15-Jan-2024 | 3-Feb-2024 | 15-Feb-2024 | 34 | 5-Mar-2024 | 15-Mar-2024 | 31 | 9-Apr-2024 | 15-Apr-2024 | 35 |
| 37 | 3707 | AMR | 31-Dec-2023 | 15-Jan-2024 | 3-Feb-2024 | 15-Feb-2024 | 34 | 5-Mar-2024 | 15-Mar-2024 | 31 | 9-Apr-2024 | 15-Apr-2024 | 35 |

AMR= Automated Meter Reading

MR = Manual Reading