

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

In the Matter of a Collaborative Workshop )  
for Customer Education and Outreach )  
Regarding the Introduction of Default ) **File No. EW-2023-0199**  
Time-of-Use Rates by Evergy Metro, Inc. )  
d/b/a Evergy Missouri Metro and Evergy )  
Missouri West, Inc. d/b/a Evergy Missouri West )

**STAFF RESPONSE TO EVERGY’S NOTICE**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff) and for its *Response to Evergy’s Notice* in this matter hereby states:

1. Evergy Missouri Metro and Evergy Missouri West (Evergy) filed a Notice in this docket on January 26, 2024, regarding a request to decrease the frequency of its Time of Use (ToU) status reports from monthly to quarterly beginning April 20, 2024, citing a desire to “evolve, ‘Customer Rate Counts and Enrollment Data,’ ‘Rate Switching Data,” and “Any new education material created and communicated to customers,” and that other reporting be discontinued or converted to quarterly reporting.

2. Staff now responds to that request asking that the Commission deny Evergy’s request, and require it to continue providing monthly reports in this docket.

As explained by Evergy in the attached data request response, Evergy does not currently have a process to retrieve the reported information from the past, and because this information is needed in the future, Evergy must obtain the information in the present. Additionally, the rate switcher frequency table that has been provided in presentations to the Commission should be provided monthly with Evergy’s report. Staff is uncertain of specifically what changes will be made to the reporting based on this request and has concerns from prior conversations with Evergy that some data may

be lost if the reports are not manually run on a monthly basis. Further, near-real-time access to reported information is needed for Staff understanding of customer service-related issues, educational concerns, and potential resolution of customer inquiries and complaints.

**WHEREFORE**, Staff prays that the Commission will accept this *Response to Evergy's Notice*; will order Evergy at a minimum to continue providing monthly reports; and will grant such other and further relief as is just in the circumstances.

Respectfully submitted,

**/s/ Whitney Scurlock**

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### **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 5<sup>th</sup> day of February 2024, to all counsel of record.

**/s/ Whitney Scurlock**



Evergy MO Metro and MO West  
Case Name: 2023 EMM\_EMW Customer Account Data Production  
Case Number: EO-2024-0002

Requestor Lange Sarah -  
Response Provided November 28, 2023

Question:0175

In File No. EW-2023-01999 Evergy files weekly what it purports to be the number of customers served on each residential rate schedule as of an indicated date. (a) Please explain from start to finish how these customer numbers are summed or calculated. . (b) can the same process be used to provide customer numbers by rate schedule by day or month, if not, why not, if yes, please explain the timing and intervals at which such information could be provided. Please provide all pertinent answers for both Evergy Missouri Metro and Evergy Missouri West. Data Request submitted by Sarah Lange ([sarah.lange@psc.mo.gov](mailto:sarah.lange@psc.mo.gov) <<mailto:sarah.lange@psc.mo.gov>>).

**RESPONSE:** (do not edit or delete this line or anything above this)

**Confidentiality:** PUBLIC

**Statement:** This response is Public. No Confidential Statement is needed.

**Response:** Answers below cover both Evergy Missouri Metro and Evergy Missouri West.

- (a) A query is executed that counts the number of active service agreements as of the day/time the query runs for a specific list of rate codes. The counts are then summarized by rate code within the query. Each active service agreement has a count of '1' towards the rate code listed on the service agreement.
- (b) The process in (a) is a short-term, manually executed, and ad hoc solution intended to gather a count of service agreements for a subset of MO residential rate codes where the service agreements are active at the time the query executes. The query will not gather data for historical purposes and report counts based on a specific historical date nor will it provide counts based on a monthly view. In order to provide historical views of customer counts on either a specific date historically, a specific month historically, or a month-over-month view, additional queries would need to be developed for each request to provide those different data sets. Additionally, the queries would need to be further developed if request requirements stipulate a one-time data pull or if the data is required to be pulled regularly at some frequency (e.g., execute monthly).



**Information provided by:** Brad Walsh, Sr. Manager Customer Analytics & Automation

**Attachment(s):**

**Missouri Verification:**

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*  
Director Regulatory Affairs