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Evergy – Exhibit 2
Dragoo Surrebuttal
Surrebuttal
File No. EO-2024-0002

Exhibit No.:
Issue: Rate design studies and rate case
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Witness: Julie Dragoo
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Evergy Missouri Metro and Evergy
Missouri West
Case No.: EO-2024-0002
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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: EO-2024-0002

SURREBUTTAL TESTIMONY

OF

JULIE DRAGOO

ON BEHALF OF

EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST

**Kansas City, Missouri
January 2024**

SURREBUTTAL TESTIMONY

OF

JULIE DRAGOO

Case No. EO-2024-0002

1 **Q: Please state your name and business address.**

2 A: My name is Julie Dragoo. My business address is 1200 Main, Kansas City, Missouri
3 64105.

4 **Q: Are you the same Julie Dragoo that filed direct testimony in this docket on November**
5 **1, 2023?**

6 A: Yes.

7 **Q: On whose behalf are you testifying?**

8 A: I am testifying on behalf of Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy
9 Missouri West (“Evergy Missouri West”) (collectively, the “Company” or “Evergy”).

10 **Q: What is the purpose of your testimony?**

11 A: I will address the unfounded concern in the testimonies of Mr. Stahlman and Ms. Lange on
12 the lack of data retention as it relates to billing and customer data. In addition, my
13 testimony will speak to the inaccuracies of statements in the testimony of Ms. Lange and
14 Mr. Luebbert regarding Evergy’s alleged inability to provide information that was clearly
15 noted as “possible” in Evergy direct testimony and Schedule BDL-1. I will speak to
16 specifics around the data requested and potential confusion of the data points as well as the
17 expanding nature of those asks. In addition, I will speak to the technical complexities for
18 these requests.

1 **Q: Please describe your understanding of Mr. Stahlman’s testimony and concern around**
2 **the “lack of proper data retention”.**

3 A: The stated purpose of Mr. Stahlman’s testimony was to discuss the implications of the lack
4 of proper data retention on developing Time of Use (“TOU”) rates with particular focus on
5 weather and weather normalization. In this purpose statement, Mr. Stahlman suggests that
6 Evergy is not retaining information as it relates to the billing of our customers. Ms. Lange
7 also asserts similar concern with the theme of “data spoliation” on page 62-64 in rebuttal
8 testimony. Whether due to confusion or lack of understanding, such claims are simply
9 untrue. Evergy is retaining the data necessary to accurately bill and serve our customers.
10 As noted in my previous testimony, our systems maintain the data in the form necessary to
11 measure usage and calculate bills at the customer level. These systems are not used for
12 data analysis, but to maintain the operations of the utility. Because the data does not exist
13 in the format requested by Staff, does not indicate Evergy is not retaining the appropriate
14 data for the billing of its customers.

15 **Q: Why is it so important to distinguish the difference between data availability and data**
16 **deliverability in Mr. Lutz’s Schedule?**

17 A: For many of the requests from Staff, there is a huge difference between the data existing
18 and available in our system and the data being in the format that Staff is requesting. For
19 example, let’s take the customer count question mentioned in nearly all the Staff witness's
20 testimony. In the Evergy billing system, there is always a view of what customer is on
21 what rate, at what address and in what billing cycle. Our Customer Care and Billing
22 (“CCB”) system, with data from the Meter Data Management (“MDM”) system, manages
23 this information and nightly performs the necessary processes to produce timely and

1 accurate bills. This information changes daily (resulting from customer actions like move
2 in, move out, rate changes, etc.) and the systems are designed to manage and record these
3 daily changes. It is not imperative to the billing processes or the daily operations of Evergy
4 to know exactly how many customers are on a rate on a given day. However, the “customer
5 count” is important data for accounting and regulatory purposes and is produced as
6 necessary as a part of those efforts. The reports to comply with those business needs were
7 designed, built, and tested over time and validated to ensure accurate information is
8 provided to meet the requirements of those business processes.

9 In the customer count scenario, even throughout Evergy there are multiple ways to
10 “count” customers (count of accounts, count of service agreements, count of bills, etc.) and
11 Ms. Lange even noted such in her testimony. Acknowledging this fact helps drive home
12 the complexity around “delivering” this data in the format requested by Staff and the
13 nuance of claims of Company deficiency.

14 Unfortunately, while Evergy was trying to distinguish the separation between
15 availability and deliverability, Staff translated this detail differently and has made
16 erroneous statements and assumptions throughout their testimony.

17 **Q: Were there any errors in Staff’s testimony around data availability?**

18 A: Yes, Mr. Luebbert’s testimony states on page 7 lines 7-8 that Evergy “...cannot sum up
19 residential customer usage from the AMI meters to provide residential customer usage...”
20 And Ms. Lange’s testimony states on page 12 line 1 “Evergy testifies in this case that they
21 cannot sum up the AMI usage for each class for each hour.” Both are inaccurate statements
22 as Staff has been provided a view of hourly usage by rate class in previous cases.

1 Additionally, Mr. Luebbert stated on page 7 line 10-11 that “Evergy’s witnesses
2 testify in this case that they cannot sum up the AMI usage for each rate schedule (and
3 therefore each class) for each hour.⁴” Again, this is a false statement based on the facts
4 above (Every has provided the hourly view of usage by class), and the fact that in Schedule
5 BDL-1, for the Staff Data Requests that reference hourly data, items 4, 8(c)3 and 8(c)4, the
6 Company specifically notes that the availability and deliverability is plausible for this
7 request but will require time and effort on the behalf of Evergy to create such a view.

8 **Q: Were there other misunderstandings in the Staff testimony?**

9 A: Yes, on page 7 line 6-9 in Ms. Lange’s testimony, she notes that it is Staff’s understanding
10 that “Evergy literally cannot retrospectively determine how many customers were on a
11 given rate schedule as of a given date in the past, and that Evergy is not taking simple steps
12 to record that information in real time when it is available to them.” This is not an accurate
13 assessment of Evergy testimony or the related DR answers. In the answer to part b of
14 data request #175 the Company indicated that while the query in reference was not built to
15 gather historical data, it is indeed possible to gather this information, but that a new query
16 would need to be designed, built, and tested to produce the requested data. I am unclear
17 how this was understood to mean that Evergy literally could not determine historical
18 customer counts. In my opinion, since the Company did not provide the requested data by
19 the date set in the Stipulation terms, Staff believes the Company has failed and cannot
20 provide the data at all. Staff does not seem to allow for the provision of the Stipulation
21 term where the Company is provided the opportunity to explain why the data was not
22 provided.

23

1 **Q: Please describe your concern with the Staff requests related to customer counts.**

2 A: On its face, maintaining a count of customers would seem to be a basic aspect of customer
3 account management, however this is an area of concern for Evergy as there tends to be
4 multiple translations to the provision of customer counts. Data request #0184 submitted by
5 Evergy and responded to by Staff confirmed that two views of customer counts would be
6 needed for the Staff analysis. This is an additional requirement from the Staff's original
7 Data Requests in Schedule BDL-1 and the estimates provided will need to be reviewed and
8 may be revised. This change of scope or requirement definition is a common to designing
9 extracts for data analysis. As more information is shared, the level of effort to obtain the
10 data can change. In truth, I am concerned this form of scope change will occur with other
11 Staff Data Requests as we execute on those authorized by the Commission. And while
12 other Evergy witnesses and I have described in both our direct and now surrebuttal
13 testimony that preparing these views are not simple, I am concerned we will be expected
14 to provide all permutations of the data requested.

15 **Q: Do changes like these also explain the ranges used for the cost estimates?**

16 A: Yes, it does. As requirements become known and fixed, the estimate of cost can become
17 more precise.

18 **Q: What other areas would you like to clarify Staff's assumptions or Evergy's position?**

19 A: Another area that deserves clarification is around the assumptions made about meter
20 adjustments and the use of sub-rate codes. In Ms. Lange's rebuttal testimony on page 18
21 she describes how the cost for Data Request #5 would be "at or below the lower end of that
22 range if Evergy simply creates rate codes within its billing system to take the place of
23 existing metering adjustments within its billing system." Evergy followed up with data

1 request #0186 for clarification on this statement. When estimating the effort for Data
2 Request #5 in Schedule BDL-1, Evergy built the estimates on the basis that any meter
3 reading adjustment (not specific to voltage) that created an updated bill would need to be
4 kept in real time and available to share with Staff. It is our understanding after reading the
5 testimony and clarifying discovery, that the true ask from Staff is that any voltage
6 adjustments on meters be made available in the data sets as requested in Data Request #4.
7 Fortunately, the way the voltage adjustments are managed are in fact through the meter.
8 MDM, and rate (not as part of billing), thus the usage stored in the Data Hub will already
9 include those adjustments.

10 Based on this understanding of Data Request #5, I agree that the cost should be at
11 the lower end of that the estimated cost range and should be included in the data produced
12 in Data Request #4 since this allows the data requests to align more closely with how the
13 billing system is currently configured for Missouri rates.

14 **Q: Please describe your thoughts on the recommendations made by Mr. Stahlman in his**
15 **testimony as it relates to the ability to provide the recommended data.**

16 A: Mr. Stahlman “recommends that the Commission direct Evergy to provide any usable
17 hourly customer usage information by rate code along with customer count information
18 and 15 minute on-peak period demand determinants by rate code for non-residential rate
19 schedules.”

20 As suggested in previous testimony, providing the hourly sum of usage by rate code
21 is an item that can be delivered given the proper time and testing to build appropriate data
22 set because the request aligns closely to the operational data maintained by the Company.
23 However, it is not reasonable for Evergy to provide the 15-minute on peak demand

1 determinants by rate code for the non-residential schedules or any schedules. While this
2 data does exist in the Evergy MDM, it is not stored in a format that allows for summation
3 of the 15-minute intervals. Making aggregated 15-minute data available will require
4 significant investment in systems to store, sum and deliver this data set. As discussed in
5 Brad Lutz's surrebuttal testimony, it is important for Evergy to confirm the Commission's
6 need for this data as it relates to rate making, as well as consideration on cost recovery,
7 before it undertakes the considerable effort the to provide the data.

8 **Q: In Ms. Lange's testimony on page 22 lines 11-19, she describes what she believes is**
9 **the issue with Evergy's decisions on customer information leading to the perceived**
10 **inability to provide the requested data. Please clarify the misunderstandings of Ms.**
11 **Lange's statement.**

12 **A:** Evergy's MDM and CCB systems serve separate purposes but work in tandem to provide
13 Evergy's basic customer service and operational needs. The purpose of the MDM is to
14 support loading, validating, editing, and estimating of meter data in preparation for billing
15 customers. Contrary to Ms. Lange's testimony, along with meter numbers, MDM contains
16 a few key pieces of customer information including customer names, premise addresses,
17 usage subscriptions, and service point information largely to serve as links to CCB.

18 The CCB system is the customer account and billing system and manages various
19 aspects of customer service such as rates and billing, accounts receivable, and maintaining
20 customer information to name a few. The CCB receives and stores usage data that is
21 collected in MDM and related to customer billing. While these two systems are separate,
22 they are integrated and work together to create the customer bill.

1 Ms. Lange asserts that Evergy has not implemented any other system in the past 10
2 years to assist in using AMI meter data “to support other utility functions such as load
3 research, weather normalization, or now-relevant research of usage on time-based rate
4 structures.” This is simply not true.

5 As noted in previous testimony and described in more detail in response to data
6 request #0179 from Staff, Evergy deployed the centralized environment referred to as the
7 Data Hub, which was designed to bring disparate data sources into one common data
8 “container” for reporting across the enterprise. This environment combines various data
9 sources (e.g., CCB and MDM and more) and allows for much of the information mentioned
10 above to be linked across both systems. Utilizing the common pieces of information
11 between each system like premise address, service point, or usage subscriptions, Evergy
12 can build more complete data views. The Data Hub provides an environment to support
13 utility initiatives and research capabilities amongst the metering and customer information
14 systems and has been used in efforts such as much of the analysis done for Evergy’s
15 residential TOU roll out this last year, and the analysis shared in data request #0183 related
16 to the load profile data for a small sample of opt-in TOU customers. To be clear, these are
17 purpose-built reports or data extractions. These aspects of the Data Hub could be used to
18 support other needs, but as mentioned previously, each data request whether it be internal
19 and external, takes time to plan, design, develop, test, and implement.

20 **Q: The “Data Hub” is mentioned in Staff testimony, and you describe it above. Would**
21 **you please provide more detail about what this represents?**

22 **A:** The centralized Data Hub was designed to bring disparate data sources into one common
23 data “container” for ease of use and reporting across the enterprise. It is not a single

1 application, but instead a collection of data sets that allows the Company to capture ever-
2 changing operational data and to produce queries and reports using this data. The Data
3 Hub is a relational Oracle Database which subject matter experts can use to support further
4 processing of operational data. For data extraction and reporting, users can use specialized
5 data extraction or visualization applications such as Oracle SQL Developer, Microsoft
6 Power BI or Oracle Analytics. All these applications are the means to reviewing the data
7 from the Data Hub. As mentioned in previous testimony, the CCB and MDM systems do
8 not provide delivered reports and analytics, so many of the day-to-day reports are produced
9 using use the Data Hub data and these noted applications. The collection of tables and
10 the data stored in those tables is derived from many enterprise systems, including the
11 Company MDM and billing systems, as well as our financial and operational systems and
12 is growing and changing based on Company need. The Data Hub is the environment and
13 data set the Company would use to execute on the achievable items from Staff's customer
14 billing-related data requests.

15 **Q: Please describe how the Company is currently using or may use the Data Hub to**
16 **support internal data needs and describe the process for executing on those needs.**

17 A: The Company is currently using the Data Hub for a plethora of internal data needs. In
18 addition to the examples mentioned above, we use the Data Hub, especially the AMI data,
19 for internal efforts such as detecting revenue protection issues by tying MDM meter usage
20 and events to CCB customer account and premise information. In this case we are not only
21 using for analytics and reporting, but as part of business process efficiencies. While this
22 example is one of many of our internal requests, I think it is important to reiterate the
23 complexity involved in building these data solutions. When an internal data request is

1 made, it is treated similarly to any other technology effort. It must be evaluated, and the
2 work estimated. Often, due to the nature of the request and the limited number of company
3 resources, prioritization conversations must be held with the support teams and business
4 teams to determine where to focus the resources. In addition, the Company may need to
5 hire external resources to accomplish a request if timelines and priorities require
6 turnarounds that cannot be met by internal teams. Here are a few of the steps required to
7 estimate and evaluate data requests:

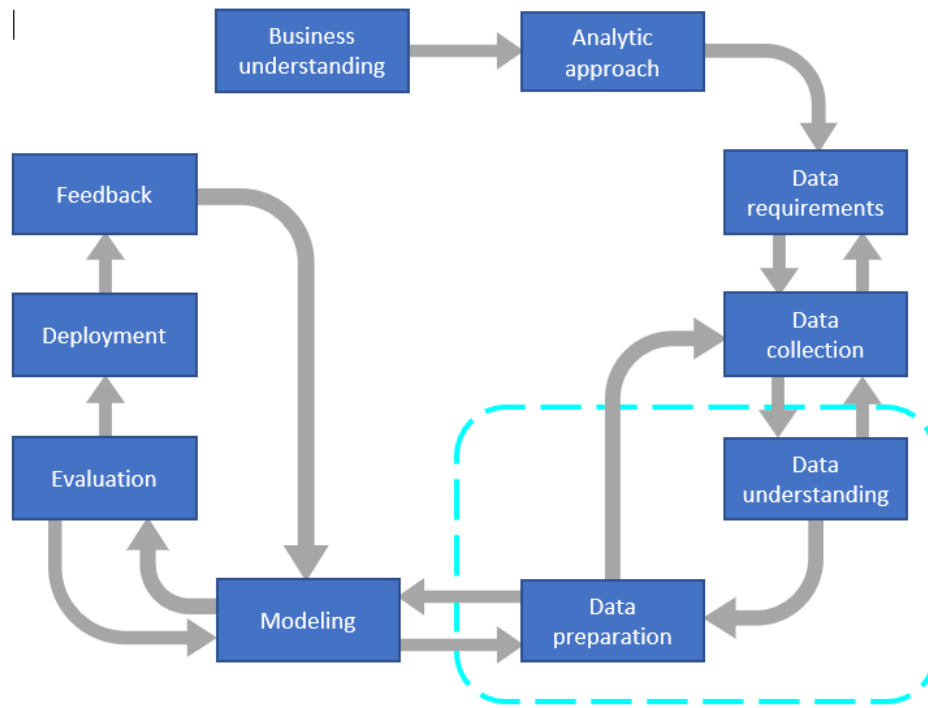
- 8 ▪ Define the desired outcome of the data request...i.e., why is this data needed
9 and what questions need answered? This helps drive decisions on what data
10 points are really required.
- 11 ▪ Define the data needed and determine if the data exists or will need to be
12 created (think aggregations, calculations, etc.) and determine the best source
13 data to capture and create for the desired outcome.
- 14 ▪ Identify requirements for data retention and governance, delivery method
15 and output format (SharePoint, shared folders, Power BI dashboard, secure
16 file transfer protocol, email, Excel spreadsheet, PDF, etc.)
- 17 ▪ Estimate the effort, any additional hardware or storage costs and determine
18 cost associated to the request. Gain approval for the one-time spend and/or
19 ongoing costs.
- 20 ▪ Prioritize the request, forecast timeline, and determine resource availability.
- 21 ▪ Design the solution to fulfill the request.
- 22 ▪ Build the query or analytics solution. This requires development/coding and
23 could be extensive depending on the ask or nature of the request. Elements

1 that drive complexity include type and amount of data involved, does the
2 data exist, does the data need to be created, number of data source systems,
3 etc.

- 4 ▪ Test and validate. As with any code or development, time is needed to
5 validate the data. This requires input and validation from multiple sources
6 depending on the ask. If it ties to multiple systems, it could require
7 operations review, accounting review, etc.
- 8 ▪ Implement and support – once a new analytics solution is built, it still needs
9 attention and support. Data extracts need monitored, process and/or data
10 changes need reviewed to see if there is impact to existing analytics
11 solutions, etc.

12 As this shows, preparing data and analytics solutions for internal or external use are not a
13 simple click of a button, or run of a query. The complexities of data understanding and data
14 preparation are visually described in the chart below.¹ It is important for Staff and the
15 Commission to recognize the effort and ongoing support new data views and analytics
16 solutions require. In addition, this work will need to be balanced across the full set of
17 requested Evergy projects including regulatory, operations and customer focused
18 initiatives.

¹<https://medium.com/ml-research-lab/part-3-data-science-methodology-from-understanding-to-preparation-a666a8203179>



1

2 **Q: Has configuration been done in the Data Hub to support Evergy ratemaking needs?**

3 A: Yes. In fact, some of the analysis that has been shared previously with Staff is derived from
 4 data in the Data Hub including the Cost-of-Service class hourly kWh for rate case weather
 5 normalization. Each of these uses followed the process detailed previously to be produced.

6 **Q: Why do you appear to repeat Evergy’s original filing and/or Direct testimony in your
 7 response to Staff’s rebuttal testimony and clarifications of specific erroneous claims
 8 made by Staff?**

9 A: My testimony highlights various examples in Staff’s rebuttal testimony where issues have
 10 been mischaracterized, misunderstood, and/or completely misstated. This was necessary
 11 because despite Evergy’s repeated attempts to answer plainly that while expansive data
 12 exists in source systems, configuration will be necessary to provide it in the manner that’s
 13 being requested by Staff; there is no acknowledgement of this fact. Staff’s continued
 14 assertions as to the need of data (despite differing views by the Company as to necessity),

1 does not eliminate the need for modification of systems and/or processes to facilitate.
2 Unfortunately, in many instances, that configuration is expected to be costly. It is
3 important that the Commission and Staff are clear on this fact and the customer impact.

4 **Q: What do you believe is driving Staff's continued misunderstanding?**

5 A: I believe that the primary driver is a general lack of understanding of the complexity of
6 Evergy's systems. Confirmation of this can be found throughout Staff testimony, not only
7 in reference to the billing and usage information, but also the cost allocation items as well.

8 **Q: Can you be more specific on why you believe Staff does not understand the complexity
9 of metering or billing systems?**

10 A: Yes, for example, on page 6 (lines 5-7 and lines 18-20) of J Luebbert's rebuttal testimony
11 he states, *"Today, it seems that there may be a need for a utility to assign a developer to
12 write a data query to provide to Staff the information"* and *"Staff understands that one
13 cannot simply pick up data out of a database and run a copy in the same manner that could
14 historically be done with paper records, but the simple development of a query..."*

15 It is clear based on the testimony of Mr. Luebbert above that Staff believes solutions
16 such as "hiring a developer to write a query, or the simple development of a query" could
17 solve for the complex data requests made by Staff. Unfortunately, Staff's continued
18 characterization and impression that complex billing engines and metering systems are
19 simple databases ready for easy querying and reporting has clouded their view of the
20 enormity of some of these requests. To reiterate, MDM and CCB are operational systems
21 meant to serve the specific and unique business processes and procedures managed by the
22 system. They are not systems intended for analytical use, but for managing the day-to-day
23 operations of the utility. In this testimony I speak to the use of the Data Hub as a way to

1 analyze, aggregate and review data from these operational systems; however, that
2 aggregation and analysis cannot happen without the development of specific tables, data
3 sets and more. This requires more than a single developer or the creation of a simple query.

4 **Q: Could there be anything else driving Staff’s lack of acceptance as to the technical**
5 **complexities of Evergy’s systems?**

6 A: Yes, plain and simple, I feel there is an overall lack of trust. It is evident in Staff testimony
7 with comments such as “it appears that technology is being used as a shield.”, that Evergy’s
8 efforts to explain the complexities of the data and systems is not being taken seriously.

9 This mistrust is important to note because it limits the ability to collaborate and
10 communicate in good faith to resolve these issues without Commission involvement. The
11 lack of availability of data in the format and detail deemed necessary by Staff does not
12 somehow mean that Evergy is manipulating data in its favor. Nor does it mean, as
13 mentioned previously, that Evergy has built these views of data in order to keep the
14 information from Staff. This overall mistrust indicates that Staff may not be willing to
15 accept any technical explanation offered by the Company regardless of how factual,
16 plausible, or reasonable the explanation may be.

17 **Q: In your testimony, you’ve stated that many of the data items requested are available**
18 **and could be delivered. Why hasn’t Evergy spent the last several months building**
19 **these data sets and providing to Staff?**

20 A. As discussed in more detail in Brad Lutz’s testimony, the Company agreed to terms that
21 set a deadline for producing the data requested and if the data could not be provided, the
22 Company would open this docket to explore why and provide the estimated cost to provide
23 each item requested. The Company seeks consideration of the data requested by Staff and

1 the Commission's direction on how rate design should be supported going forward. While
2 Staff may have believed Evergy should be working on providing data during this time in
3 formats that currently do not exist, and could be costly to deliver, Evergy intended to use
4 this docket to confirm the Commission support of Staff's need for the data requested and
5 if so, what is the best way to provide the data. As noted in previous testimony, there is a
6 significant amount of system and data configuration to accommodate Staff's data requests.
7 Utilizing this docket as planned in the Stipulation terms does not indicate some failing by
8 the Company, but instead a step to ensure the cost and effort to produce the data requested
9 is a prudent use of Company resources and cost to be incurred. Balancing Company
10 resources across competing priorities is a constant challenge and one where customer
11 impact is always considered.

12 **Q: Does that conclude your testimony?**

13 **A:** Yes, it does.

