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# Exhibit No. 201

Staff – Exhibit 201  
Lange Rebuttal (public only)  
Rebuttal  
File No. EO-2024-0002

*Exhibit No.:*  
*Issue(s):* Stipulation Commitments,  
Billing Determinants, and  
CCOS/Rate Design  
*Witness:* Sarah L.K. Lange  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Rebuttal Testimony  
*Case No.:* EO-2024-0002  
*Date Testimony Prepared:* December 15, 2023

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**ENGINEERING ANALYSIS DEPARTMENT**

**REBUTTAL TESTIMONY**

**OF**

**SARAH L.K. LANGE**

**EVERGY MISSOURI METRO, INC.,  
d/b/a EVERGY MISSOURI METRO**

**and**

**EVERGY MISSOURI WEST, INC.,  
d/b/a EVERGY MISSOURI WEST**

**CASE NO. EO-2024-0002**

*Jefferson City, Missouri  
December 15, 2023*

**\*\* Denotes Confidential Information \*\***

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**EVERGY MISSOURI METRO, INC.,  
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**CASE NO. EO-2024-0002**

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1 **REBUTTAL TESTIMONY**

2 **OF**

3 **SARAH L.K. LANGE**

4 **EVERGY MISSOURI METRO, INC.,**  
5 **d/b/a EVERGY MISSOURI METRO**

6 **and**

7 **EVERGY MISSOURI WEST, INC.,**  
8 **d/b/a EVERGY MISSOURI WEST**

9 **CASE NO. EO-2024-0002**

10 Q. Please state your name and business address.

11 A. My name is Sarah L.K. Lange, 200 Madison Street, Jefferson City, MO 65101.

12 Q. By whom are you employed and in what capacity?

13 A. I am employed by the Missouri Public Service Commission (“Commission”) as  
14 an Economist for the Tariff/Rate Design Department, in the Industry Analysis Division. A copy  
15 of my case participation and credentials is attached as Schedule SLKL-r1.

16 **EXECUTIVE SUMMARY**

17 Q. What is the purpose of your rebuttal testimony?

18 A. The purpose of this testimony is to address the stated inability of Evergy Metro,  
19 Inc., d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc., d/b/a Evergy Missouri West  
20 (collectively, “Evergy”) to provide to Staff with the information that is needed to provide the  
21 Commission with recommendations to set revenue requirements and order rates in rate cases.  
22 Some of this information is primarily needed to calculate revenues and billing determinants,  
23 while some of this information pertains more directly to completion of class cost of service and  
24 rate design studies. In recent rate cases, Staff has endeavored to explain the information needed

1 to provide competent recommendations, and to work with Evergy, on methods to start to  
2 preserving and providing this information. Yet, in recent rate cases Evergy has had difficulty:

3 (1) providing timely and current information for calculating update period revenues and  
4 billing determinants, requiring Staff to rely on customer number and usage data that  
5 is over a year old. Staff expert Kim Cox provides additional testimony on the use of  
6 this data, while I address Evergy's specific commitments under the 2022 Stipulation  
7 and Agreement;

8 (2) providing information necessary to produce reasonably accurate peak information  
9 for use in Average and Excess and related production allocators. Staff expert  
10 Michael Stahlman provides additional testimony on the data necessary, while I  
11 address Evergy's specific commitments under the 2022 Stipulation and Agreement.

12 **Because 10-20% or more of Evergy's customers are expected to take service on**  
13 **a highly-differentiated rate code, this information that was not a literal**  
14 **necessity in prior cases will likely be a literal necessity for weather**  
15 **normalization in future rate cases. This information is also necessary for any**  
16 **evaluation that may be made of the use of time-based rates to reduce capacity**  
17 **needs.**

18 (3) providing information necessary to study the rate differentials of existing Evergy  
19 rate schedules and rate codes that vary by size of customer and customer voltage.

20 I will address this issue. This information is also helpful in evaluating Evergy's  
21 "rate modernization" proposals, and in studying rate structures.

22 Q. How is your testimony organized?

23 A. I will address the following topics:

- 1 (1) I will describe the information Evergy committed to provide in the Stipulation and  
2 Agreement dated August 30, 2022 (“2022 Stipulation and Agreement”), which the  
3 Commission approved in its *Order Approving Four Partial Stipulations and Agreements*  
4 in Case Nos. ER-2022-0129 and ER-2022-0130 (“*Stipulation Order*”), effective  
5 October 2, 2022. For each element, I will confirm that, to date, Evergy failed to provide  
6 the information it committed to provide in the 2022 Stipulation and Agreement.  
7
- 8 (2) I will provide Staff’s recommendation for each item in light of Evergy’s estimates of the  
9 cost to provide data, or Evergy’s failure to provide estimates of the cost to provide data, as  
10 applicable.  
11
- 12 (3) I will discuss the representations in Evergy’s direct testimony in this case concerning the  
13 reasons why it cannot provide the data and its testimony concerning the cost to provide the  
14 data it committed to provide in the 2022 Stipulation and Agreement. I will discuss the  
15 importance of the information requested to Evergy’s rate case net revenue requirement  
16 determination, Evergy’s rate case usage and revenue weather normalization, Evergy’s rate  
17 case billing determinant calculation, Evergy’s class cost of service (CCOS) studies, and  
18 Evergy’s rate design by rate class. This discussion will be organized by the information  
19 Evergy committed to retain.  
20
- 21 (4) I will discuss Staff’s concerns with potential data spoliation, and the representations made  
22 by Evergy counsel regarding data spoliation.

23 Q. Throughout his testimony, Evergy witness Mr. Bradley Lutz refers to the items  
24 of information that Evergy Missouri committed to provide as “data requests.” Could this be  
25 confusing to a reader?

26 A. Yes. The items under discussion are not data requests as that term is used to  
27 refer to discovery between parties during the pendency of a case. Rather, Evergy Missouri  
28 Metro and Evergy Missouri West committed to provide the indicated cost, expense, and usage  
29 information. To the extent Evergy Missouri Metro and Evergy Missouri West were unable to  
30 provide the information they agreed to provide, Evergy Missouri Metro and Evergy Missouri  
31 West committed to file testimony explaining why the information cannot be provided and its  
32 estimate of the cost to provide the information it asserts it cannot provide.

1 Q. Why is the information included in the 2022 Stipulation and Agreement critical  
2 to setting just and reasonable rates in future cases?

3 A. At the time that I filed my direct testimony in the ER-2022-0129 and  
4 ER-2022-0130 rate cases, which is the language referenced in the 2022 Stipulation and  
5 Agreement, the information listed was needed to reduce regulatory lag and to reduce the  
6 reliance on uneducated guesses in class cost of service studies. Since Evergy made the data  
7 commitments that are the subject of this case, thousands of Evergy customers have begun taking  
8 service on the “Nights & Weekends Max Plan,” “Nights & Weekends Plan,” and “Summer  
9 Peak Time Based Plan,” rate schedules.<sup>1</sup>

10  **Time of Use Rate Enrollments**  
*Active Customers on TOU rates as of December 4, 2023*

Rate Plan	MO West	MO Metro	Total
Nights & Weekends Max Plan (3-period/high differential)	15,575	8,013	23,588
Nights & Weekends Plan* (3-period)	7,775	5,567	13,342
Default Time Based Plan (peak adjustment charge/low diff/default)	250,648	227,558	478,206
Summer Peak Time Based Plan (2-period)	26,558	27,541	54,099
EV Only Plan (separately metered/3-period/high differential EV rate)	-	-	-
<b>Total</b>	<b>300,556</b>	<b>268,679</b>	<b>569,235</b>

11 \* Inclusive of pre-existing enrollments

12 These schedules will require an unprecedented departure from the historic weather  
13 normalization processes and assumptions that Staff and Evergy rely on to estimate the money  
14 Evergy receives for the product it sells (revenue) and the amount of energy it sells under each  
15 rate code at each rate (billing determinants). It is unthinkable to attempt to calculate revenues

<sup>1</sup> Evergy weekly report on active customers on ToU Rates as of December 4, 2023, filed in EW-2023-0199.

1 and billing determinants for these rate codes without having access to the energy sold in each  
2 hour to each rate code as metered by automated metering infrastructure (AMI) meters.

3 Q. Are the other items of stipulated information still important?

4 A. Yes. However, AMI hourly reads summed by rate code, at a consistent voltage,  
5 for the test year and update period are now essential and critical to processing an Evergy  
6 Missouri West or Evergy Missouri Metro rate case.

7 Q. Do you provide recommendations for the Commission?

8 A. Yes, these recommendations are discussed below in the section “Recommended  
9 Path Forward.” Evergy’s Data Commitments

10 Q. What commitments did Evergy make in the 2022 Stipulation and Agreement  
11 in Case Nos. ER-2022-0129 and ER-2022-0130, and approved by the Commission in its  
12 Order Approving Four Partial Stipulations and Agreements effective October 2, 2022,  
13 (“Stipulation Order”)?

14 A. At page 12, Evergy made the commitment set out below:

15 4) Data Retention: a) Prior to July 1, 2023, the Company will  
16 identify and provide the data requested in the direct testimony of Sarah  
17 Lange. If the requested data is not available or cost-prohibitive to  
18 produce, the Company will file a motion to establish an EO docket. In  
19 that docket the Company will provide the reason why it cannot provide  
20 the requested data and its individual estimate of the cost to provide each  
21 set of requested data, for the further consideration of the parties and the  
22 Commission.

23 Q. What information did Evergy agree to provide prior to July 1, 2023?

24 A. Evergy agreed to provide customer and usage information to be used in weather  
25 normalization, revenue calculation, billing determinant calculation, net system input  
26 calculation, (including information for calculating the fuel adjustment cost (FAC) base factor),  
27 and also to be used in CCOS studies. Additionally, Evergy agreed to provide distribution plant



1 and expense information to calculate the discount provided through its current rate structures  
2 to customers served at voltages other than secondary and information to improve the accuracy  
3 of rate design, and Evergy agreed to provide information to study implementation of an on-peak  
4 demand charge. Finally, Evergy committed to provide certain information upon Staff request,  
5 and to retain information so that it would be available for future use.

6 Q. What do you mean by “customer and usage information?”

7 A. I mean the number of customers on each Evergy rate schedule in each month,  
8 and the amount of energy sold through each rate schedule for each hour.

9 Q. Did Evergy provide to Staff the number of customers on each Evergy rate  
10 schedule prior to July 1, 2023?

11 A. No.

12 Q. Has Evergy since provided this information?

13 A. No, Evergy has not provided any information.

14 Q. Has Evergy sought reasonable clarification that may have delayed provision  
15 of this information, such as whether the information sought is the actual number of customers,  
16 the number of bills issued, the number of premises served, the number of accounts served,  
17 concerns about bill cycle lengths, questions about whether to include or exclude rebills, or any  
18 other matter?<sup>2</sup>

---

<sup>2</sup> The text of the Evergy commitment is “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; 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.”

1           A.     No.   Regulatory accounting and revenues are complicated.   “Customer,”  
2 “account,” “premise,” and similar terms can have slightly different meanings among utilities.  
3 Similarly, because “month” can be ambiguous when it comes to billing, the data Evergy  
4 committed to provide specifically refers to the first and last calendar day of a given calendar  
5 month.  However, it is Staff’s understanding based on Evergy’s testimony in this case and prior  
6 rate cases, and data request (DR) responses in this case and prior rate cases, that Evergy literally  
7 cannot retrospectively determine how many customers were on a given rate schedule as of a  
8 given date in the past, and that Evergy is not taking simple steps to record that information in  
9 real time when it is available to them.

10           Q.     Have you inquired of Evergy as to what data it anticipates providing in future  
11 rate cases, such as the Evergy Missouri West rate case for which it has filed a notice of intended  
12 filing in File No. ER-2024-0189?

13           A.     Yes.  Staff’s DR 0182 requested information to determine whether Evergy will  
14 be able to provide as-billed data, and whether significant regulatory lag is likely.  It states:

15                   (a) Please provide the number of rebills by rate class month, separately,  
16 for Evergy Missouri Metro and Evergy Missouri West, for the last 36  
17 calendar months. (b) For Evergy’s direct filing, please describe the bill  
18 count data, customer count, or customer charge count data, by rate  
19 schedule, that Evergy anticipates it will be able to provide to Staff in the  
20 next general rate case, including but not limited to discussion of whether  
21 Evergy will be able to provide usage data as it occurred in the month it  
22 was billed as it was billed, or if data provided for a prior month will  
23 reflect rebills and/or customer rate selection as it existed in the month in  
24 which data was pulled, and specifying whether bill count, customer  
25 count, customer charge count, or some other data set will be relied on by  
26 Evergy for its direct case. (c) For Staff’s direct filing reflecting an update  
27 period, please describe the bill count data or customer count data, by rate  
28 schedule, that Evergy anticipates it will be able to provide to Staff in the  
29 next general rate case, including but not limited to discussion of whether  
30 Evergy will be able to provide usage data as it occurred in the month it  
31 was billed as it was billed, or if data provided for a prior month will  
32 reflect rebills and/or customer rate selection as it existed in the month in

1 which data was pulled, and specifying separately whether bill count,  
2 customer count, customer charge count, or some other data set will be  
3 available. (d) For a true-up period, please describe the bill count data or  
4 customer count data, by rate schedule, that Evergy anticipates it will be  
5 able to provide to Staff in the next general rate case, including but not  
6 limited to discussion of whether Evergy will be able to provide usage  
7 data as it occurred in the month it was billed as it was billed, or if data  
8 provided for a prior month will reflect rebills and/or customer rate  
9 selection as it existed in the month in which data was pulled, and  
10 specifying separately whether bill count, customer count, customer  
11 charge count, or some other data set will be available. (e) For the month  
12 of November 2023, will bill count, customer charge count, and usage  
13 data that Evergy may provide in February 2024 regarding November  
14 2023 match the data regarding November 2023 that Evergy may pull in  
15 May of 2024? If not, please describe the extent of differences that would  
16 be anticipated. (f) For the month of November 2023, will billing and  
17 usage data that Evergy may provide in February 2024 regarding  
18 November 2023 match the data regarding November 2023 that Evergy  
19 may pull in June of 2024? If not, please describe the extent of differences  
20 that would be anticipated. Please provide all pertinent answers for both  
21 Evergy Missouri Metro and Evergy Missouri West.

22 Evergy's responses are provided below:

23 [rebill table omitted]

24 (b) Speculation concerning future ratemaking and processes current or  
25 pending to support those filings are not applicable to this case.

26 (c) Speculation concerning future ratemaking and processes current or  
27 pending to support those filings are not applicable to this case.

28 (d) Speculation concerning future ratemaking and processes current or  
29 pending to support those filings are not applicable to this case.

30 (e) For data and deliverables typically provided by the Company in a  
31 rate case, Evergy intends to pull this data from a static data source/Data  
32 Hub. The Data Hub/source will pull information from CCB/MDM, at a  
33 specific point in time. If a given time period is pulled/included, this DR  
34 mentions November 2023, Evergy would not repull data for that  
35 month/November 2023, in May of 2024, instead, it would simply use the  
36 original November data. So, November data that was given in February  
37 would match/tie to November data given in May 2024. However, if new  
38 data was requested that had to be extracted from CCB/MDM system for  
39 November because the requested data was not pulled originally or in the

1 detail needed later, that data would have to be repulled from the source  
2 system and because the source system (MDM/CCB) is dynamic, it might  
3 not match. Exact tie out would only be possible if all data (and iterations  
4 of granular data if wanting various levels of detail) is pulled into the data  
5 hub and the Company is able to pull rate case information from this static  
6 source. The degree of difference between the static pull and  
7 CCB/MDM(that can change dynamically) is impossible to provide with  
8 any precision, as it would require the Company to attempt to compare  
9 static pulls to the core systems over a period of time. Even if the  
10 Company ventured to do this, it would not necessarily be predictive of  
11 the degree of change that could happen in the future.

12 (f) Please see e.

13 Q. Is Evergy's ability to provide timely customer count and related data in a future  
14 rate case relevant to this case?

15 A. Absolutely. This case is an opportunity for the Commission to ensure that the  
16 data necessary to estimate revenues and billing determinants for an appropriate time period is  
17 available for future rate cases.

18 Q. What is the importance of rebill information and the "static data source"  
19 referenced in Evergy's response to part (e)?

20 A. While I did not reproduce the full rebill table due to length, Evergy's data request  
21 response for Evergy West indicated 5,332 residential rebills for June 2023, 5,950 residential  
22 rebills for July 2023, and 3,535 residential rebills for August 2023 (compared to 1,196, 1,373,  
23 and 1,227 for the same months in 2022). For Evergy Metro, Evergy indicated 4,143 residential  
24 rebills for May of 2023 and 4,631 for June of 2023 (compared to 992 and 1,370 for 2022).  
25 Evergy's response to part (e) indicates an intent to pull data into a set repository for Evergy's  
26 direct case. Staff's understanding from prior cases is that Evergy cannot pull more than one set  
27 of data into its repository. So, we know that there were billing problems over the summer of  
28 2023, leading to an excessive number of rebills. We know that total rate code switching

1 occurred during the late summer and early fall for all Evergy residential customers. And  
2 Evergy's data request responses lead us to conclude that it is likely that Evergy will be unable  
3 to provide Staff with customer information for the months between Evergy's test year and  
4 Staff's direct filing.

5 Q. Did Evergy provide to Staff the amount of energy sold through each rate  
6 schedule for each hour prior to July 1, 2023?

7 A. No.

8 Q. Has Evergy since provided this information?

9 A. No, Evergy has not provided any information.

10 Q. Has Evergy sought reasonable clarification related to provision of this  
11 information, such as whether the information can be provided at a consistent voltage for a rate  
12 schedule as a final product without the raw data and adjustments described in their data  
13 commitment?<sup>3</sup>

14 A. No. Aggregated usage data can also be complicated. Staff welcomes  
15 discussions with Evergy on when it may be more reasonable to provide raw data and raw  
16 adjustments, or data-as-adjusted in some cases. No such discussions have occurred.

17 Q. Is Evergy able to provide data from its AMI meters and various data  
18 management or billing systems to provide as-metered or as-billed customer usage to Staff for  
19 use in rate cases?

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<sup>3</sup> The text of the Evergy commitment is "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; 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."

1           A.     Eversource says it is unable to provide as-metered or as-billed customer usage to  
2 Staff for use in rate cases, without the time and money expenditures described in Mr. Lutz's  
3 confidential schedule.

4           Q.     In rate cases, when Eversource provides class hourly loads and class peak  
5 information, is that information based on adding together all of the AMI meter reads for each  
6 customer in each class in each hour?

7           A.     No, it is not. Eversource apparently still relies on the load research techniques that  
8 pre-date AMI deployment. For rate cases, Eversource studies the hourly usage of sample  
9 customers, and extrapolates those customer usage patterns to a residential class level, and  
10 commercial and industrial class levels for the remaining studied classes at various voltages.<sup>4</sup>

11          Q.     For example, in a rate case, if Eversource reports a residential class peak of  
12 100 MWh at 4:00 pm on July 5, does that mean that Eversource simply added up every (or almost  
13 every) residential customer's usage in that hour as reported by every (or almost every)  
14 residential customer's AMI meter?

15          A.     No. Eversource does not sum up residential customer usage from the AMI meters  
16 to provide residential customer usage as used in rate cases for weather normalization, fuel  
17 and production runs, revenue determination and billing determinant creation, or class cost  
18 of service.

19          Q.     Now that virtually all customers have AMI meters, why doesn't Eversource just sum  
20 up the AMI metered usage for each class for each hour?

---

<sup>4</sup> Discussed below, Eversource's responses in this docket are not consistent with the testimony of Al Bass in Eversource's most recent rate cases.

1           A.     Evergy testifies in this case that they cannot sum up the AMI usage for each  
2 class for each hour.

3           Q.     What data did Evergy commit to provide related to its distribution system costs  
4 and expenses?

5           A.     Evergy committed to provide information to calculate the discount provided  
6 through its current rate structures to customers served at voltages other than secondary.  
7 Specifically, Evergy committed to provide information to better quantify the plant that  
8 comprises the secondary distribution system and the plant that comprises the primary  
9 distribution system.<sup>5</sup> Evergy's current rate schedules exempt certain customers from paying  
10 return on the plant that comprises its secondary distribution system and also exempt those  
11 customers from paying the same percentage of distribution expense (including depreciation) as  
12 the exempted plant amount.<sup>6</sup>

13          Q.     Did Evergy provide the identification of plant by primary and secondary voltage  
14 to Staff prior to July 1, 2023?

15          A.     No.

16          Q.     Has Evergy since provided this information?

17          A.     No, Evergy has not provided this information, although Evergy has provided  
18 some responses to some related data requests.

19          Q.     Has Evergy sought reasonable clarification that may have delayed provision of  
20 this information?

---

<sup>5</sup> The text of the Evergy commitment is "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.**" [Emphasis added.]

<sup>6</sup> These customers are also exempted from paying the same percentage of distribution expense and a proportionate amount of indirect expenses as the percent of distribution plant from which they are exempted.

1 A. No.

2 Q. What information did Evergy commit to provide to improve the accuracy of rate  
3 design?

4 A. Evergy's current rate schedules charge different rates for customers within the  
5 rate schedule by providing different rate codes for customers served at primary voltage distinct  
6 from secondary voltage, (and substation voltage and transmission voltage, as applicable).  
7 Within a schedule, these differences are defined by "rate code." Evergy committed to provide  
8 information to better quantify the plant that is associated with customers within each rate  
9 schedule served at these different voltages, and billed on different rate codes.<sup>7</sup>

10 Q. Did Evergy provide the information related to service of customers at different  
11 voltages to Staff prior to July 1, 2023?

12 A. No.

13 Q. Has Evergy since provided this information?

14 A. No, Evergy has not provided this information, although Evergy has provided  
15 some responses to some related data requests.

16 Q. Has Evergy sought reasonable clarification that may have delayed provision of  
17 this information?

18 A. No.

19 Q. Evergy committed to develop the determinants for assessment of an on-peak  
20 demand charge to replace the current monthly billing demand charge, and for potential

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<sup>7</sup> The text of the Evergy commitment is "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.**" [Emphasis added.]



1 implementation for customers not currently subject to a demand charge. What is the background  
2 of this commitment?

3 A. In the ER-2022-0129/0130 rate cases, Kavita Maini, on behalf of the Midwest  
4 Energy Consumers Group (MECG) recommended the following approach as applicable to both  
5 Large Power Service (LPS) and Large General Service (LGS) rate structures on pages 7, 38,  
6 and 39 of her direct testimony:

- 7 • Shift fixed costs from energy charges to demand charges but do not change  
8 the energy charge differentials.
- 9 • **Introduce an on-peak provision whereby the maximum demand set in**  
10 **the specified on peak hours is the billing demand for the month.**
- 11 • Evaluate a time differentiated on and off-peak energy rate to recognize the  
12 cost differentials and provide better pricing signals than a flat energy rate.
- 13 • Set up a working group of interested parties to evaluate these alternatives  
14 and assess rate impacts.
- 15 • Gather consensus on the steps and introduce to be introduced in the future.  
16 [sic]
- 17 **[Emphasis added.]**

18 Staff generally agreed,<sup>8</sup> as did Evergy.

19 Q. Did Evergy provide to Staff the information related to on peak demand charges  
20 prior to July 1, 2023?

21 A. No.

22 Q. Has Evergy since provided this information?

---

<sup>8</sup> My rebuttal testimony stated, in pertinent part, at page 55, “Taken on its own, the recommendation to “do not change the energy charge differentials” is not consistent with a cost-based approach to rate design. It is imperative that energy sold at retail by the utility meet or exceed the incremental cost of energy acquired at wholesale by the utility. While it is not reasonable to attempt to exactly match the cost of energy in each of the 8,760 hours of the year, it is important to set rates that are generally covering the marginal cost of the energy acquired on behalf of the consuming customer. This concept is consistent with implementation of time differentiated on and off-peak energy rates to recognize the cost differentials and provide better pricing signals than a flat energy rate, or a blocked rate.”

Rebuttal Testimony of  
Sarah L.K. Lange

1 A. No, Evergy has not provided any information.

2 Q. Has Evergy sought clarifications that may have delayed provision of this  
3 information?

4 A. No.

5 Q. Did Evergy make other data commitments related to the provision of the  
6 information described above in the 2022 Stipulation and Agreement?

7 A. Yes. Evergy committed to provide the following to Staff upon request:

- 8 1) the information to calculate the discount provided through Evergy's  
9 current rate structures to customers served at voltages other than  
10 secondary and information to improve the accuracy of rate design,<sup>9</sup>  
11 2) a minimum of 12 months<sup>10</sup> of customer<sup>11</sup> and usage information,<sup>12</sup>  
12 3) for rate codes with more than 100 customers, a sample of individual  
13 customer hourly data, and identified peak demands for those 100

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<sup>9</sup> Discussed, *infra*, in the section "Distribution Plant and Expense Information."

<sup>10</sup> Evergy also committed that "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 [customer and usage information and distribution plant information] should be provided or retained for those instances."

<sup>11</sup> Staff DR 70 to Evergy Metro, and Staff's parallel DR 141 to Evergy West requested "(a) Is Evergy MISSOURI METRO currently capable of providing the total number of customers served on any given rate code that are billed based on AMI metering versus non-AMI metering? (b) Please identify the rate codes for which Evergy MISSOURI METRO can provide the total number of customers that are billed based on AMI metering versus non-AMI metering. (c) Please identify the rate codes for which Evergy MISSOURI METRO cannot provide the total number of customers that are billed based on AMI metering versus non-AMI metering. (d) **For each rate code for which Evergy MISSOURI METRO can provide the information, please provide the total number of customers served billed based on AMI metering versus non-AMI metering for the calendar month of July 2023, the calendar month of October 2023, the billing month of July 2023, and the billing month of October 2023.** (d) What is Evergy MISSOURI METRO's estimate of the cost to provide the total number of customers served on any given rate code that are billed based on AMI metering versus non-AMI metering? (e) What is Evergy MISSOURI METRO's estimate of the cost to provide the total number of customers served on any given rate code that are billed based on AMI metering versus non-AMI metering, at each voltage at which service is available on that rate code?"

Evergy's response was "Reporting of 'total number of customers served for which interval meter reads are available' is one of the items examined by the Company in its Direct testimony. Available details are offered there. Reporting of rates billed by AMI/non-AMI represents a new element of the request and would be additional effort to the scope identified in the Company Direct testimony. The Company has not performed the analysis requested. Information provided by: Brad Lutz"

<sup>12</sup> Staff DR 71 to Evergy Metro, and Staff's parallel DR 142 to Evergy West requested "(a) For which rate codes is Evergy MISSOURI METRO capable of producing the sum of customer usage for each of 8,760 hours in a year for those customers who are AMI metered? (b) Separately for each Evergy MISSOURI METRO rate code, provide Evergy MISSOURI METRO's estimate of the cost to become capable of producing the sum of customer usage for each of 8,760 hours in a year for those customers who are AMI metered?"

Evergy's response was "The Company has not performed the analysis requested. Details on estimate provided by the Company in Direct testimony. Available details are offered there. Information provided by: Brad Lutz."

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- 1 customers in the form requested at that time (i.e. monthly 15 minute  
2 non-coincident, annual 1 hour coincident);  
3 4) for rate codes with 100 or fewer customers, individual customer  
4 hourly data, and identified peak demands for those customers in the  
5 form requested at that time (i.e. monthly 15 minute non-coincident,  
6 annual 1 hour coincident).<sup>13</sup>

7 Q. Has Staff requested this information?

8 A. Yes, Staff requested this information in this case, as noted in the DRs above, as  
9 well as in DR 2 in File No. EC-2024-0092.<sup>14</sup>

10 Q. Has Evergy provided this information?

11 A. No, Evergy has not provided that information.

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<sup>13</sup> Staff DR 74 to Evergy Metro, and Staff's parallel DR 145 to Evergy West requested "(a) Please provide for each rate code 100 individual customers' hourly data for the years 2021, 2022, and 2023. If a given rate code has less than 100 customers, please provide this information for each customer on that rate code. (b) What is Evergy MISSOURI METRO's estimate of the cost to provide for each rate code 100 individual customers' NCP based on 15 minute hourly data for each month in the years 2021, 2022, and 2023, separately, for each of the following time periods (1) 6 am - 8 pm; (2) 6 am and 10 am; and (3) 2 pm and 9 pm?"

Evergy's response to each DR was "a. Reporting of hourly data is one of the items examined by the Company in its Direct testimony. Available details are offered there. b. Data is not available. As noted in the Company Direct Testimony reporting is not available based on 15 minute interval. Information provided by: Brad Lutz."

<sup>14</sup> Question 2: Please provide the following information: 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;. 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; 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; 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; 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; 6) 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); 7) 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). Sarah Lange (sarah.lange@psc.mo.gov)

Response (October 5, 2023): The Company's ability to provide the information requested is being addressed under EO-2024-0002.

Information provided by: Brad Lutz

1 Q. Did Evergy make any other commitments in the 2022 Stipulation and  
2 Agreement?

3 A. Yes. Evergy committed to provide in general rate proceedings “all data  
4 described above for a period of not less than 36 months, except that Staff does not request  
5 individual customer data for 36 months except as needed for peak demand calculation.” Evergy  
6 committed to retain and study data related to the reactive demand requirements of each rate  
7 code, and sample customers within each rate code. Evergy committed that individual customer  
8 interval data shall be retained for a minimum of 14 months. If individual data is acquired by the  
9 Company in intervals of less than one hour in duration, such data shall be retained in intervals  
10 of no less than one hour. Evergy committed to retain individual hourly data for use in providing  
11 bill-comparison tools for customers to compare rate alternatives. Finally, Evergy committed to  
12 retain coincident peak determinants for use in future rate proceedings.

13 **RECOMMENDED PATH FORWARD**

14 Q. In light of Evergy’s cost estimates for the distribution data, what should the  
15 Commission order in this docket?

16 A. Evergy failed to provide cost estimates for items of distribution data, and, to  
17 date, Evergy has refused in discovery to cooperate with Staff requests to establish the relative  
18 costs of provision of distribution data. The Commission should leave this docket open as a  
19 repository for discovery and for resolution of potential discovery disputes, as Staff proceeds to  
20 request information to complete a distribution system study. For example, Staff has asked  
21 Evergy to estimate the time and cost of conducting surveys of equipment, and Evergy has

1 objected to those DRs and responded that they cannot be compelled to provide an answer.<sup>15</sup>  
2 Staff recommends this docket be used as a means to resolve areas where Evergy asserts that it  
3 cannot provide requested data because production of this data would require Evergy to perform  
4 additional analysis.<sup>16</sup> Some analysis of distribution system costs must occur at some point.

5 Q. In light of Evergy's cost estimates for the customer and usage data, what should  
6 the Commission order in this docket?

7 A. As discussed in greater detail below, Evergy's cost estimates for this data range  
8 from just under \*\* [REDACTED] \*\* to \*\* [REDACTED] \*\* million. Based on Evergy's testimony and  
9 responses to its DRs, Staff is of the understanding that the estimate will be at or below the lower  
10 end of that range if Evergy simply creates rate codes within its billing system to take the place  
11 of existing metering adjustments within its billing system. This would not impact the rate  
12 charged to any customer, and could be accomplished without modification of Evergy Metro or  
13 Evergy West's tariff, although Staff would prefer that the rate schedules eventually reflect these  
14 sub-rate codes for improved transparency.

15 If usable hourly customer usage information by rate code can be provided at the lower  
16 end of this range through use of sub-rate codes, Staff recommends the Commission direct  
17 Evergy to proceed with the provision of that information, along with the customer count  
18 information. Note, due to the proliferation of customers on highly-differentiated time-based  
19 rates, it may be appropriate to expand the requirement for monthly customer counts by rate code  
20 to a requirement of monthly customer counts by rate code by billing cycle.

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<sup>15</sup> Representative DRs and responses 31, 102, 35, 106, 39, 110, 40, 111, 44, 115, 45, 116, 49, 120, 53, 124, 66, and 137 are attached as Schedule SLKL-r2.

<sup>16</sup> These recommendations are in addition to those presented by Staff witness J Luebbert.

1 Q. In light of Evergy's cost estimate of \*\* [REDACTED] \*\* for the provision of sample  
2 customer data for use in reviewing rate impacts, what is Staff's recommendation?

3 A. If Evergy's cost estimate is accurate,<sup>17</sup> Staff will not request this expenditure at  
4 this time for the study of customer rate impacts. Staff encourages Evergy to remain in  
5 communication with Staff about this matter so that sample customer usage can be obtained as  
6 necessary for review of significant changes in rate design.

7 Q. In light of Evergy's cost estimate for creation of on-peak demand charge  
8 determinants, what should the Commission order in this docket?

9 A. The Commission should order that Evergy produce 15 minute on-peak period  
10 demand determinants by rate code for non-residential rate schedules. Staff, Evergy, and the  
11 signatories to the 2022 Stipulation and Agreement should be ordered to define up to five sets  
12 of on-peak demand periods for this study.<sup>18</sup>

13 Q. At page 10 of his testimony, Mr. Lutz states "Q: In your opinion, is the request  
14 for data identified in data request 1 appropriate? A: No. If additional detail about these costs is  
15 deemed necessary, I believe alternate data be considered." Do you have any comments on this  
16 testimony?

17 A. Yes. First, Mr. Lutz does not include in his testimony nor do any other  
18 Evergy witnesses, a discussion of this alternative data or an estimate of the cost of acquiring  
19 that alternative data. Second, Mr. Lutz has not had a discussion with Staff concerning  
20 alternate data since the conclusion of the rate cases.<sup>19</sup> In response to Staff DR 1, Mr. Lutz

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<sup>17</sup> Evergy has not yet provided workpapers or an explanation of how they arrived at this estimate.

<sup>18</sup> The periods defined within a given set may vary by season, for example, 5 am to 6 pm in winter, and 9 am to 10 pm in summer.

<sup>19</sup> Staff DR 2, "At page 10 Mr. Lutz states "Q: In your opinion, is the request for data identified in data request 1 appropriate? A: No. If additional detail about these costs is deemed necessary, I believe alternate data be considered." Please identify the date, time, and location of any discussion Mr. Lutz or another Evergy employee

1 declined to provide any discussion of alternative data beyond what he provided in his direct  
2 testimony in EO-2024-0002.<sup>20</sup> As illustrated in Evergy's responses to Staff DRs attached in  
3 Schedule SLKL-r2, Staff's attempts to explore alternative data through discovery in this docket  
4 have not been productive.

5 **DATA AVAILABILITY AND USES**

6 Q. What information will be provided in this section?

7 A. I will discuss the representations in Evergy's direct testimony in this case  
8 concerning the reasons why it cannot provide the data and its testimony concerning the cost to  
9 provide the data it committed to provide in the 2022 Stipulation and Agreement. I will discuss  
10 the importance of the information requested to the Evergy rate case net revenue requirement  
11 determination, Evergy's rate case usage and revenue weather normalization, the Evergy rate  
12 case billing determinant calculation, CCOS studies in Evergy rate cases, and rate design by rate  
13 class and rate code, as applicable. I will focus on the customer and usage information and the  
14 distribution cost and expense information issues.

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inquired of Sarah Lange or any other member of PSC staff the suitability of alternate data to address Staff's concerns." Evergy 11/13/2023 Response, "Other than similar suggestions made in Company rebuttal testimony, discussions about alternate data have not occurred. In the ER-2022-0129/0130 rate case, the Company replied to Staff discovery that the distribution data is not available. Staff presented their position in Rebuttal testimony and the topic became part of the large data retention question memorialized in the stipulation and leading to this EO docket."

<sup>20</sup> Staff DR 1, "At page 10 Mr. Lutz states "Q: In your opinion, is the request for data identified in data request 1 appropriate? A: No. If additional detail about these costs is deemed necessary, I believe alternate data be considered." Please describe the alternative data that Mr. Lutz believes can be considered concerning each of the following items, separately: (1) line transformer costs and expenses by rate code; (2) primary distribution costs and expenses by voltage; (3) secondary distribution costs and expenses by voltage; (4) primary voltage service drop costs and expenses; (5) line extension costs, expenses, and contributions by rate code and voltage; and (6) meter costs by voltage and rate code." Evergy 11/13/2023 Response, "None of this data is available in the association requested. This issue is detailed in the Company testimony. Distribution costs by rate code are particularly problematic. The testimony concerning alternatives, focuses mainly on existing data from the Company CCOS studies could be more fully utilized to establish pricing. Views of Unbundled cost data provides further details about the class cost allocations that has been largely underutilized for ratemaking purposes. The presumption that distribution costs can be accurately expressed at such granular levels will plague any effort to satisfy the construct of the Staff data requests."

1 Q. Mr. Lutz testifies at pages 8 and 9:

2 In general, the data requested from Staff is either new data or new  
3 combinations of data not normally retained by the Company or existing  
4 data requested in a form not normally maintained or exported by the  
5 Company. The Company systems are designed to accumulate, process,  
6 and retain data for the purpose of producing customer bills, managing  
7 Company work, and maintaining Company books and records. These  
8 systems are designed to perform limited data analytics and export,  
9 mainly in direct support of the primary system purpose.

10 The Staff requests are also problematic because much of the data  
11 requested would require combining data from distinct systems that aren't  
12 integrated in a manner to facilitate reporting/extraction on a combined  
13 basis- i.e., reporting or query capability isn't readily available that pulls  
14 data from all of these systems simultaneously and needed common  
15 characteristic to establish these linkages are not in place. It was also  
16 noted that the systems often "feed" into other systems in one direction,  
17 therefore edits and adjustments in one system are not populated  
18 backwards to the source systems, resulting in differences in the data.

19 He further testifies on page 9:

20 I want to be clear that these systems are not deficient in their design or  
21 inadequate to support Company operations or even to support historic  
22 ratemaking methods. The bulk of the data requested is associated with  
23 new concepts being promoted by Staff and do not align with these system  
24 purposes or with historic ratemaking.

25 Another important detail is that consideration of these data requests  
26 occurred during the time constraints of discovery in the Company rate  
27 cases or during a time when Company resources were committed to  
28 implementing the Commission's Order concerning deployment of  
29 mandatory Time of Use rates. In both cases, limited availability of time  
30 has impacted the Company response to these requests.

31 What is your response?

32 A. I agree that Evergy committed to provide information that Evergy was unable to  
33 provide to Staff in the ER-2022-0129/0130 rate cases in the 2022 Stipulation and Agreement.  
34 That agreement provided Evergy nearly a year to organize the data to provide the information  
35 to Staff or to estimate the costs to organize the data. Evergy's explanations in its direct



1 testimony in this case for why it cannot provide information now (or in July of 2023) are no  
2 different than the explanations provided in response to Staff's DRs in the ER-2022-0129/0130  
3 rate cases.

4           However, I disagree that the data Evergy committed to provide is associated with  
5 "new concepts being promoted by Staff." This is particularly true of the customer and usage  
6 data commitments. Reliance on the sum of AMI-metered data for hourly loads of each rate  
7 code is a "new" concept in that Evergy did not have AMI meters prior to 2014, but Evergy's  
8 failure to design adequate communication into its metering and billing systems is anything but  
9 a fringe or novel Staff theory. In fact, Mr. Lutz's testimony concerning the lack of cross  
10 communication is the exact problem.

11           Q.     In simple terms, what is the problem with Evergy's decisions on billing and  
12 metering implementation regarding the customer and usage information Evergy committed to  
13 provide?

14           A.     Evergy's metering system and meter data storage do not have access to customer  
15 information other than a meter number, while Evergy's billing system does not have access to  
16 usage information other than billed units, and no other system has been implemented in the  
17 nearly 10 years since Evergy began installing AMI meters to actually get AMI meter data out  
18 of the meter data system to support important utility functions such as load research, weather  
19 normalization, or now-relevant research of usage on time-based rate structures.

20           Q.     Prior to this EO docket, did you understand the full depth of this problem?

21           A.     No. Concerning hourly load data, Mr. Lutz's testimony in this case is a  
22 contradiction of Mr. Al Bass's testimony in the ER-2022-0129/0130 rate cases. Evergy Metro,  
23 Evergy West, and other utilities have provided hourly class loads by commercial and industrial

1 delineation, in essentially every rate case since at least the mid 2000's, if not earlier, as the  
2 weather response may differ between these customer types established by FERC reporting  
3 requirements. Within and across rate classes, it is necessary to know the voltage at which  
4 customers are served so that the various classes can be aggregated at a consistent voltage.  
5 Neither of these aspects are new or unusual. The new aspect for Evergy is breaking out classes  
6 by rate codes. Of note, Evergy's rate codes generally correspond to the voltage of service.

7 Q. Is the information you describe here consistent with the information Evergy  
8 states it used in the ER-2022-0129/0230 rate cases?

9 A. Yes. In the direct testimony of Al Bass in the ER-2022-0129/0130 rate cases,  
10 on page 5, he states:

11 Q: Describe how the Cost-of-Service class hourly load data was procured from AMI.

12 A: Metered hourly kwh was extracted for each rate code for the period July 1, 2019  
13 through June 30, 2021. The customer counts for the hourly kwh were adjusted  
14 each month for any customers without interval capable meters by multiplying  
15 the rate code hourly kwh by a factor of ((billed customer count – AMI customer  
16 count) / AMI customer count). This is similar to the approach used to scale hourly  
17 load research sampled KWH to represent the entire class. The two different  
18 processes for producing class hourly loads are summarized in the following  
19 statements: (a) The Company's load research data utilized a small (up to 10% for  
20 Large customer classes, lower than 1% for Residential customer classes), but  
21 statistically significant stratified sample of each customer class load scaled up to  
22 the total number of class customers. (b) The Company's AMI hourly load data  
23 utilizes a convenience sample of load for all customers with interval capable  
24 meters in each class (80+% for each class during the test year) scaled up to the  
25 total number of class customers.

26 The class level information I requested is the information Mr. Bass described in this  
27 testimony.

28 Further, at page 37 of the Evergy Metro version of his testimony in the  
29 ER-2022-0129/0130 rate cases, Mr. Lutz states, as a benefit of AMI:

1 Load Analysis – Evergy has transitioned away from statistical Load  
2 Research and is now utilizing AMI data aggregation for Load Analysis.  
3 In load research, daily and hourly rate class profiles are developed  
4 through designing and deploying customer samples, collecting,  
5 managing, and validating customer sample hourly load data, and  
6 applying statistical-based sample expansion methods. Under data  
7 aggregation the Company compiles the load information using data  
8 query and management techniques from the entire customer data set.  
9 Once in place and going forward, the data aggregation process is  
10 significantly less complex, requires less time to generate class load  
11 profiles, and is less costly than load research.

12 Q. Do the statements by Mr. Lutz and Mr. Bass in Case Nos. ER-2022-0129 and  
13 ER-2022-0130 contradict Evergy’s claims through testimony and DR responses in this case?

14 A. Yes. The process Mr. Bass describes and Mr. Lutz refers to is the process  
15 described in the 2022 Stipulation and Agreement: Provide summed AMI meter reads by hour,  
16 and the customer count information necessary to adjust for customers who are not AMI  
17 metered. (Neither witness explicitly discusses the metering adjustments described in part 5 of  
18 the stipulation, but the AMI meter reads cannot be accurately summed without those  
19 adjustments.)

20 Q. Is the data Evergy committed to provide related to the distribution system  
21 anything new?

22 A. No. This information is discussed in the 1992 National Association of  
23 Regulatory Utility Commissioners (“NARUC”) manual, and is integral to its current rate  
24 structures.

25 Q. Is Staff incorporating more customer and usage information into its class cost of  
26 service studies than occurred historically?

1           A.     Staff has moved to using a market cost of energy allocation since the Missouri  
2 utilities began participating in integrated energy markets, which requires hourly load data.<sup>21</sup>  
3 Other allocators used by other parties (and Staff) require demand data, which requires hourly  
4 load data for its calculation. Staff has also looked at alternative distribution allocations that  
5 look at system utilization and rely on hourly load data, but this requires the same information  
6 that is needed for market cost of energy allocations.

7           Q.     Is there a reason for distribution allocation to be the focus of more attention than  
8 in the past?

9           A.     Yes. Due to the financial incentives of Plant in Service Accounting treatment,  
10 distribution is simply an increasingly large component of rate base at Evergy West, Evergy  
11 Metro, and other utilities.

12          Q.     How has distribution allocation been handled in the past?

13          A.     My understanding is that during the 1990s, and periodically before, distribution  
14 studies were conducted to establish costing relationships. Staff recommends that the  
15 Commission leave this docket open to contain discovery as Staff pursues the information  
16 necessary to perform such a study in the near future.

17                   **Customer and Usage Information**

18          Q.     At page 12 of the 2022 Stipulation and Agreement, Evergy made the  
19 commitment that,

20                   ... [p]rior to July 1, 2023, the Company will identify and provide the data  
21 requested in the direct testimony of Sarah Lange. If the requested data is  
22 not available or cost-prohibitive to produce, the Company will file a  
23 motion to establish an EO docket. In that docket the Company will

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<sup>21</sup> Staff's approach more reasonably accounts for cost causation resulting from integrated energy market participation by aligning energy purchases with purchases by studied class (or studied rate code if that information is available).

1 provide the reason why it cannot provide the requested data and its  
2 individual estimate of the cost to provide each set of requested data, for  
3 the further consideration of the parties and the Commission.

4 To what extent has Evergy's direct testimony in this case provided the reason why it cannot  
5 provide the customer and usage information?

6 A. Evergy's testimony in this case reiterates prior reasons it has stated for why it  
7 cannot provide customer and usage data – namely, there is inadequate communication  
8 capability between its AMI meters, its “meter data management system,” and its billing system  
9 to produce the following information:

10 1) Counts of the number of customers served on a given rate code in a  
11 prior month, i.e. how many customers Evergy has, and how many customers are  
12 taking service on a given rate plan,

13 2) The amount of energy sold to customers on a given rate code in a  
14 given hour, and

15 3) The amount of energy sold to customers on a given rate code in a prior  
16 calendar month, regardless of the current rate code of a given customer.

17 Q. These three pieces of information sound much more straightforward than the  
18 items set out in the 2022 Stipulation and Agreement. Doesn't Evergy provide this information  
19 in every rate case? So why are provision 2-5 in the 2022 Stipulation and Agreement so  
20 complicated?

21 A. Evergy does not provide this information in every rate case, and based on its  
22 testimony in this case, Evergy will not be able to provide this information in rate cases going  
23 forward. Staff witnesses Michael L. Stahlman, Kim Cox, and J Luebbert provide additional  
24 testimony on the importance of adequate data availability for weather normalization, revenue  
25 and billing determinant calculation, and Missouri Energy Efficiency Investment Act (MEEIA)

1 adjustments, respectively. Mr. Luebbert also addresses information asymmetry and provides a  
2 recommendation concerning mitigation of this issue. Below, I will map the interaction of these  
3 areas, and discuss the limitations of the data Evergy is able to provide. I will also discuss how  
4 the need for this data has only increased due to the significant increase in the number of  
5 customers served on highly-differentiated time-based rate schedules.

6 The 2022 Stipulation and Agreement language is intended to add specificity necessary  
7 to ensure that usable data is provided, and to address differences in how rate codes are used in  
8 Evergy Metro's tariff and Evergy West's tariff. The inclusion of provision "a" included as a  
9 subpart for Evergy's commitments in paragraphs 2, 3, and 4, and the existence of paragraph  
10 5,<sup>22</sup> are necessary to perform the mathematical adjustments necessary to add together usage that  
11 occurs at different voltages. This information is also useful for allocation of costs in class cost  
12 of service studies under existing and potential rate structures.

13 Q. Why don't paragraphs 2-5 simply read "for each rate code, provide the total  
14 number of customers served each month, and the sum of customers' interval meter readings, by  
15 interval?"

16 A. There are a few reasons:

- 17 1. Evergy Missouri Metro customers can be served at a voltage  
18 different than the voltage they are billed at,
- 19 2. A billing month is much more than 28-31 days long, due to  
20 calendar billing,
- 21 3. Not all customers take service on AMI meters.

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<sup>22</sup> This language relates to the billing adjustments and voltage adjustments necessary to sum hourly data among customers who are metered at various voltages.

**Counts of Customers per Rate Code with and without AMI Meters**

Q. Why does the 2022 Stipulation and Agreement language need to address the number of customers taking service through AMI meters on each rate code, as well as the total number of customers taking service on each rate code?

A. If most or all of the customers on a particular rate code are AMI metered, then the answer to both questions 2 and 3 will be the same. However, if only some customers on a rate code are AMI metered, then we need to know the difference in customer counts to determine whether the usage of AMI metered customers can be expected to be representative of other customers, and to extrapolate the known usage to account for the unknown usage. While this aspect is fairly straightforward, a simple example is provided below:

	Customer Count	Sum of AMI-Metered Usage				
		Hour 1	Hour 2	...	Hour 719	Hour 720
Total customers on Rate Code	100	?	?	...	?	?
Total AMI-metered customers on Rate Code	95	670	680	...	500	510
<i>Extrapolation Factor (estimated)</i>	1.053	1.053	1.053	...	1.053	1.053
<i>Extrapolated Hourly Usage</i>		671.05	681.05	...	501.05	511.05

In this example, 95 customers out of 100 total customers are AMI-metered. Since 95 multiplied by 1.053 equals the total number of 100 customers, the usage in each hour is simply factored up by 1.053.

**Billing Months, Billing Cycles, Calendar Months, Weather Normalization, and Relationship to Historic Rate Schedules**

Q. Why did the differences between billing months, billing cycles, and calendar months complicate the language necessary to describe the customer count data at the time Staff drafted the language that became the basis for the 2022 Stipulation and Agreement?

A. For most customers, a bill for a month's electricity service does not correspond to the calendar month. Billing cycles enable utilities to spread out the work of calculating and

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1 issuing bills, dealing with customer questions and concerns, and processing bill payments. For  
2 a simple example, below is a sample of a June billing month with two billing cycles, one of  
3 which “Cycle A” begins on May 15 and runs through June 14, and one, “Cycle B,” which begins  
4 on June 1 and runs through June 30. Cycle A is shown in yellow and orange, with Cycle B  
5 shown in orange and red:

May							June						
1	2	3	4	5	6	7	1	2	3	4	5	6	7
9	10	11	12	13	14	15	9	10	11	12	13	14	15
17	18	19	20	21	22	23	17	18	19	20	21	22	23
25	26	27	28	29	30	31	25	26	27	28	29	30	

7  
8 Without time-based rates, Staff and utilities developed weather normalization processes  
9 designed to estimate the amount of energy that would be sold within a given “billing month” if  
10 all customers had experienced “normal weather” by analyzing the relationship between actual  
11 weather and units sold. Those units sold were modeled by the Company through a process  
12 known as “load research.”

13 In a rate case, the Staff expert responsible for calculating revenues and billing  
14 determinants would be provided the sales that occurred by rate code, and by billing determinant  
15 by Evergy.<sup>23</sup> For purposes of this example, we’ll call this revenues and determinants expert  
16 Kim. The Staff witness responsible for calculating weather, typically a different person, we’ll  
17 call this person in this example Michael. Michael would use the best information he can get  
18 from the company to estimate the response to weather of customers in the calendar month of  
19 June. In the past, for most utilities, there is not information available to study the response of

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<sup>23</sup> Subject to the ability of Evergy to accurately provide that information for the time period requested.



1 customers to weather by billing cycle. Michael would also use the best information he can get  
2 from the company to estimate the response to weather of customers by calendar months.

3 Kim would take the information from Michael, and adjust the sales that occurred by rate  
4 code for each applicable billing determinant (energy sold in first block, energy sold in second  
5 block, and energy sold in third block, for residential rate codes) to estimate how much total  
6 energy would have been sold in the June billing month if “normal” weather had occurred based  
7 on the weather responses calculated at the class-level that was modeled.

8 Prior to AMI metering, it simply wasn’t reasonable to expect utilities to provide usage  
9 data by day of consumption, and because most rate structures are based on cumulative blocked  
10 usage, daily usage information would actually complicate the process of estimating usage per  
11 billing month, per block, per rate code.<sup>24</sup>

12 Q. Is usage per billing month, per block, per rate code, needed in a rate case, if rate  
13 structures do not include highly-differentiated time-based components?

14 A. Absolutely. This is discussed by Staff witness Kim Cox.

15 **Billing Months, Billing Cycles, Calendar Months, Weather Normalization, and**  
16 **Relationship to Time-Based Rate Schedules**

17 Q. How do the interrelationship of differences between billing months, billing  
18 cycles, and calendar months complicate the language necessary to describe the data  
19 requirements for revenue normalization and billing determinant estimation for customers  
20 served on time-based rate schedules?

---

<sup>24</sup> Hourly usage and usage per day are relevant to production cost allocation and other allocations in CCOS studies as performed by Evergy, Staff, MIEC, and MECG, as these values are used to estimate class-level demands. Hourly usage by rate code is also essential to design and study of time-based rates from a CCOS and rate design perspective.

1           A.     At the time Staff drafted the language that became the basis for the 2022  
2 Stipulation and Agreement, Staff contemplated that about 16% of Evergy's residential  
3 customers<sup>25</sup> would be paying rates with time-of-day and day-of-week price differentials of  
4 roughly 40 cents per kWh.

5           As illustrated above, the current weather and revenue normalization process glosses  
6 over details of hourly and daily usage, because those details are all but irrelevant to revenue  
7 and billing determinant calculations under historic rate structures.

8           Q.     If, due to weather, a customer on the Evergy West rate code MORT2 (the two-  
9 part ToU rate plan) uses 3 kWh more than normal on a Saturday evening in June, what is the  
10 value to Evergy of the excess sale?

11          A.     The value to Evergy of the excess revenue would be 3 kWh of usage, about  
12 \$0.24 of revenue (\$0.08103 per kWh).

13          Q.     If, due to weather, a customer on the Evergy West rate schedule MORT2  
14 uses 3 kWh more than normal on a Friday evening in June, what is the value to Evergy of the  
15 excess sale?

16          A.     The value to Evergy of the excess revenue would be 3 kWh of usage, about  
17 \$0.97 of revenue (\$0.32412 per kWh). The hourly data by rate schedule that Evergy committed  
18 to provide in the 2022 Stipulation and Agreement is the bare minimum information that will be  
19 necessary for Staff to develop processes to account for the time-of-day and day-of-week that  
20 are now responsible for rate differences many times greater than those that applied to the  
21 historic blocked rate structures.

22          Q.     Is hourly information by rate code also needed for other purposes?

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<sup>25</sup> Evergy weekly report on active customers on ToU Rates as of December 4, 2023, filed in EW-2023-0199.



1           A.       This information is necessary in order to add together loads from customers who  
2 may be metered at different voltages. A simple example is provided:

3

Customer	Rate Schedule	Metered Voltage	Usage at Metered Voltage	Voltage Adjustment to Primary Voltage	Usage Adjusted to Primary Voltage
A	LGS	Secondary	100	1.03	103
B	LGS	Secondary	100	1.03	103
C	LGS	Primary	100	1	100
D	LGS	Primary	100	1	100
		<b>Total:</b>	400		406
		<b>Average:</b>	100.00		101.50

4

5           My understanding is that Evergy West has aligned its rate codes with its service voltages  
6 for the vast majority of its customers, and those customers are billed based on their metered  
7 voltage and usage, thus subpart a on each of these provisions, and paragraph 5 in total, may be  
8 applicable only to Evergy Metro.

9           The Evergy West rate codes generally correspond to the service voltage of the customer.  
10 However, Evergy Metro rate codes provide rates by various voltages. The rate schedules  
11 include a provision for “metering at different voltages.” These adjustments to metered usage  
12 preclude simply adding up the usage reported by the AMI meter for customers on a given rate  
13 code in a given hour, but only for those rate codes where customers do receive service at  
14 different voltages. The tariff provision is reproduced below:

15                           **METERING AT DIFFERENT VOLTAGES**

16           The Company may, at its option, install metering equipment on the  
17 secondary side of a primary voltage customer’s transformer. In that  
18 event, the customer’s metered demand and energy shall be increased  
19 either by the installation of compensation metering equipment, or by  
20 2.34% if metering equipment is not compensated.

21           The Company may also, at its option, install metering equipment on the  
22 primary side of the transformer for a secondary voltage customer. In this

1 case, the customer's metered demand and energy shall be decreased by  
2 2.29%, or alternatively, compensation metering may be installed.

3 For substation voltage customers metered at primary or secondary  
4 voltage level, the metered demand and energy shall be increased by  
5 1.20% (metered at primary voltage) or 3.56% (metered at secondary  
6 voltage), or alternatively, compensation metering may be installed.

7 For transmission voltage customers metered at substation, primary, or  
8 secondary voltage level, the metered demand and energy shall be  
9 increased by .90% (metered at substation voltage), 2.11% (metered at  
10 primary voltage), or 4.50% (metered at secondary voltage), or  
11 alternatively, compensation metering may be installed.

12 **Customer and Usage Data Information Provided in Evergy's Direct Testimony**

13 Q. To what extent has Evergy's direct testimony in this case provided its individual  
14 estimates of the cost to provide the customer and usage data for the further consideration of the  
15 parties and the Commission?

16 A. Concerning what Mr. Lutz refers to as items two and three, Mr. Lutz's Schedule  
17 states that it would require approximately \*\* [REDACTED] \*\*<sup>26</sup> to provide the total  
18 number of customers on each rate code on the first and last day of each month, and the total  
19 number of customers at each voltage served on rate code where customers may be served at  
20 more than one voltage, whether or not those customers are equipped with an AMI meter.  
21 Mr. Lutz's schedule states that it would require approximately \*\* [REDACTED] \*\* to  
22 provide the same information identifying only those customers served with an AMI meter.

23 Concerning what Mr. Lutz refers to as item four, Mr. Lutz's Schedule states  
24 \*\* [REDACTED] \*\* would be required to provide AMI metered data for each hour for  
25 each rate code.

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<sup>26</sup> It is unclear if these estimates are one-time or ongoing costs.

1 Q. Is \*\* [REDACTED] \*\* the total estimate to obtain the data discussed  
2 above necessary to determine weather normalization by rate code, calculate normalized and  
3 annualized revenues by rate code, and produce actual hourly loads by rate code?<sup>27</sup>

4 A. It does not appear so. Apparently the hourly loads that Evergy would provide  
5 from AMI metering would not be adjusted to a consistent voltage nor would Evergy Metro's  
6 internal voltage adjustments be supplied. Mr. Lutz testifies that identifying these adjustments  
7 would require \*\* [REDACTED] \*\*. \*\* Without these adjustments applied, the hourly load  
8 data would not be usable for classes that have a significant amount of energy metered at a  
9 voltage inconsistent with the rate code. These adjustments are the subject of provision 5.

10 Q. If Mr. Lutz's testimony at pages 10 and 11 concerning provision 5 is accurate,  
11 do you have an alternative suggestion to avoid expenditures of up to \*\* [REDACTED] \*\* while  
12 actually making use of the distinguishing features of AMI meters to obtain hourly load data?

13 A. Yes. If it really costs \*\* [REDACTED] \*\* to overcome Evergy's failure  
14 to include logic in its metering and billing systems to replace its load research program with  
15 actual aggregated AMI data, then a more reasonable course of action would be to consider  
16 creating rate codes within the billing system that correspond to the metering adjustment  
17 arrangements that exist. I will discuss the existing load research program below, and discuss  
18 this potential solution in greater detail.

19 Q. In your opinion, is it "worth" approximately \*\* [REDACTED] \*\* for  
20 Evergy to have the ability to provide usable hourly load data, and customer counts by rate code  
21 by month, in future rate cases?

---

<sup>27</sup> These items also are necessary for production of normalized and annualized billing determinants, and are also used for estimation of demands used by all parties in class cost of service studies, as well as improved class cost of service and rate design studies that consider energy usage patterns.

1 A. Yes. It is hard to imagine that Evergy has expended less than \*\* [REDACTED]  
2 [REDACTED] \*\* fighting this issue to date, through at least three general rate cases and this docket.  
3 Billing determinants and normalized and annualized revenues are foundational to every rate  
4 case. This information is absolutely needed.

5 Q. Could you provide a simple example of the use of customer count information,  
6 and the importance of accurate revenue and billing determinant calculation?

7 A. Yes. As an example, imagine a very simple utility had 10 customers and each  
8 customer used 1,000 kWh per month with a \$10 customer charge and an energy charge of  
9 \$0.10/kWh. That utility's billing determinants would be 120 customer charges, and 120,000  
10 kWh. That utility's revenues would be \$13,200 (\$1,200 + \$12,000).

11

	<b>Data</b>
Customers	10
kWh/Customer/Month	1,000
<b>Determinants</b>	
Customer Charge	120
Energy Charge	120,000
<b>Rate</b>	
Customer Charge	\$ 10.00
Energy Charge	\$ 0.10
<b>Revenues</b>	
Customer Charge	\$ 1,200
Energy Charge	\$ 12,000
Total Revenue	\$ 13,200

12  
13 In this example, the Commission determines that the utility's cost of service is \$15,000.  
14 This would be ordered as a \$1,800 revenue requirement increase, a 13.6% increase. The new  
15 customer charge and energy charge (assuming no changes to rate design) would be  
16 calculated by first determining the revenue to be derived from each the customer charge and  
17 the energy charge, and then dividing each by the applicable determinants. An illustration of the

Rebuttal Testimony of  
Sarah L.K. Lange

1 calculation of compliance rates is provided below, in which the reported data accurately reflects  
2 the actual data:

	<u>Actual</u>	<u>Reported</u>	<u>Compliance</u>
<b>Data</b>			
Customers	10	10	10
kWh/Customer/Month	1,000	1,000	1,000
<b>Determinants</b>			
Customer Charge	120	120	120
Energy Charge	120,000	120,000	120,000
<b>Rate</b>			
Customer Charge	\$ 10.00	\$ 10.00	\$ 11.36
Energy Charge	\$ 0.10	\$ 0.10	\$ 0.11
<b>Revenues</b>			
Customer Charge	\$ 1,200	\$ 1,200	\$ 1,364
Energy Charge	\$ 12,000	\$ 12,000	\$ 13,636
Total Revenue	\$ 13,200	\$ 13,200	\$ 15,000

4  
5 However, if the reported data does not match the actual data, error is introduced into the  
6 compliance rate calculation. This is illustrated below:

	<u>Actual</u>	<u>Reported</u>	<u>Compliance</u>
<b>Data</b>			
Customers	11	10	10
kWh/Customer/Month	1,100	1,000	1,000
<b>Determinants</b>			
Customer Charge	132	120	120
Energy Charge	145,200	120,000	120,000
<b>Rate</b>			
Customer Charge	\$ 10.00	\$ 10.00	\$ 11.36
Energy Charge	\$ 0.10	\$ 0.10	\$ 0.11
<b>Revenues</b>			
Customer Charge	\$ 1,320	\$ 1,200	\$ 1,364
Energy Charge	\$ 14,520	\$ 12,000	\$ 13,636
Total Revenue	\$ 15,840	\$ 13,200	\$ 15,000



The result of the introduction of error into the compliance tariff calculation is that revenue recovery going forward will not be expected to result in reasonable recovery of the ordered revenue requirement. This is illustrated below:

	<u>Actual</u>	<u>Reported</u>	<u>Compliance</u>	<u>Actual Going Forward</u>
	<b>Data</b>			
Customers	11	10	10	11
kWh/Customer/Month	1,100	1,000	1,000	1,100
	<b>Determinants</b>			
Customer Charge	132	120	120	132
Energy Charge	145,200	120,000	120,000	145,200
	<b>Rate</b>			
Customer Charge	\$ 10.00	\$ 10.00	\$ 11.36	\$ 11.36
Energy Charge	\$ 0.10	\$ 0.10	\$ 0.11	\$ 0.11
	<b>Revenues</b>			
Customer Charge	\$ 1,320	\$ 1,200	\$ 1,364	\$ 1,500
Energy Charge	\$ 14,520	\$ 12,000	\$ 13,636	\$ 16,500
Total Revenue	\$ 15,840	\$ 13,200	\$ 15,000	\$ 18,000
			Revenue Goal:	\$ 15,000
			Revenue Discrepancy:	\$ 3,000

Q. Should we ever expect usage under new rates to exactly match determinants calculated in the prior rate case?

A. No. Changes in weather, changes in numbers of customer served, and changes in customer usage by quantity and by time are all reasons why we would not expect actual usage to precisely match normalized and annualized rate case billing determinants. However, making determinants less accurate will not improve the matching of future usage to rate case billing determinants, and is not reasonable.

Q. Are assumptions underlying the current MEEIA throughput disincentive design called into question with the introduction of a significant number of customers on high-differentiated rate codes?

1           A.     Yes. This issue is discussed in greater detail by Staff witness J Luebbert.  
2           Essentially, the current throughput disincentive mechanism requires rate case billing  
3           determinants to be adjusted for an annualized level of sales deemed to be avoided due to the  
4           installation of MEEIA measures. Historically, this was performed on a monthly basis, with  
5           simple prorations related to rate codes. Given the exponential differences in rate revenue from  
6           an avoided kWh sale among the time-based residential rate plans, this mechanism will likely  
7           need to be significantly redesigned in the future. Accurate hourly loads by rate schedule will  
8           be necessary for accurate application of throughput disincentive annualizations.

9           Q.     Without hourly load information by rate schedule, will it be possible to study at  
10          any level the effectiveness of various time-based rate schedules at influencing the use of energy  
11          during hours that may set Evergy Metro's or Evergy West's system peak for capacity and  
12          reliability purposes?

13          A.     No, meaningful study of these rate plans will require rate code-level hourly  
14          usage and daily customer counts.

15                   **Distribution Plant and Expense Information**

16          Q.     To what extent has Evergy's direct testimony in this case provided the reason  
17          why it cannot provide the distribution plant and expense information?

18          A.     The bulk of Evergy's testimony concerns Evergy's (and a hired consultant's)  
19          opinions that the information that Evergy committed to provide in the 2022 Stipulation and  
20          Agreement is not really necessary. I did not locate any information concerning Evergy's ability  
21          to provide the distribution plant and expense information that was not already explained to Staff

1 by Evergy in previous cases. To date, Evergy has not participated with Staff to discuss, identify,  
2 or provide alternative information.<sup>28</sup>

3 Q. To what extent has Evergy’s direct testimony in this case provided estimates of  
4 the cost to provide the distribution and expense information for the further consideration of the  
5 parties and the Commission?

6 A. Unfortunately, Evergy’s direct testimony in this case was very vague  
7 concerning cost information, and Evergy’s responses to Staff’s data requests in this case reveal  
8 that Evergy did not undertake a good faith effort to comply with its commitments made in the  
9 2022 Stipulation and Agreement. Specifically, the stipulation language refers to the filing of  
10 an EO docket for Evergy to provide “its individual estimate of the cost to provide each set of  
11 data described, for the further consideration of the parties and the Commission,” in reference to  
12 the following sets of data:

13 line transformer costs and expenses by rate code;  
14 primary distribution costs and expenses by voltage;  
15 secondary distribution costs and expenses by voltage;  
16 primary voltage service drop costs and expenses;  
17 extension costs, expenses, and contributions by rate code and voltage;  
18 and meter costs by voltage and rate code.

19 However, Evergy provided a single lump sum estimate of \*\* [REDACTED]

20 [REDACTED] \*\* for providing this information.

21 Q. Did Staff conduct discovery to determine the effort to be associated with each  
22 set of data to potentially prioritize proceeding with certain data sets and considering alternatives  
23 for other data sets?

24 A. Yes. Staff asked identical DRs to Evergy Metro and Evergy West, recognizing

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<sup>28</sup> At page 10 Mr. Lutz states “Q: In your opinion, is the request for data identified in data request 1 appropriate?  
A: No. If additional detail about these costs is deemed necessary, I believe alternate data be considered.”

1 that Evergy West was an independently operated utility in the recent past, and an expectation  
2 that cost results may vary by utility due to this fact. These DRs inquired of the cost estimates  
3 for each data set identified above, although in the case of the data sets related to the secondary  
4 and primary distribution costs and expenses, the data requests were organized by distribution  
5 plant account. Staff also issued identical DRs to Evergy Metro and Evergy West asking what  
6 data is necessary to provide the information described in each data set. These DRs and Evergy's  
7 responses are set out below, although only the Evergy Metro version is provided unless there  
8 was a difference in responses between utilities:

9 *DR 7 & 78: What is Evergy MISSOURI METRO's estimate of the cost to estimate line*  
10 *transformer cost and expenses by rate code?*  
11

12 Response: The Company has not prepared an estimate of cost for this specific facility type.  
13 Please refer to Company testimony concerning the estimates prepared. Beyond CCOS  
14 allocations, the Company does not have a clear approach to associate transformer costs to  
15 rate codes. Information provided by: Brad Lutz  
16

17 *DR 11 & 82: (a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify*  
18 *line transformer costs by rate code? (b) In Evergy MISSOURI METRO's opinion what data*  
19 *is necessary to identify line transformer expenses by rate code? (c) In what systems are the*  
20 *data necessary to identify line transformer costs by rate code stored? (d) In what systems*  
21 *are the data necessary to identify line transformer expenses by rate code stored?*  
22

23 Evergy Metro Response:

24 a. See #7

25 b. See #7

26 c. The Company does not have a clear approach to associate transformer costs to rate codes.  
27 Costs are in the CCOS. If allocation to rate code is to be based on usage determinants, the  
28 data is available in Company CCOS. Further information from the Company Billing system  
29 would be needed to ensure correct representation of the rate code.

30 d. The Company does not have a clear approach to associate these expenses to rate codes.  
31 Expenses are in the CCOS. If allocation to rate code is to be based on usage determinants,  
32 the data is available in Company CCOS. Further information from the Company Billing  
33 system would be needed to ensure correct representation of the rate code. Elements of the  
34 data may be contained in the company Work Management System, Mapping System,  
35 Property Records System and Billing System. The Company is unaware of a data key to  
36 associate the data and produce the requested output.

37 Information provided by: Brad Lutz  
38

1 Evergy West Response

2 a. See #78

3 b. See #78

4 c. The Company does not have a clear approach to associate transformer costs to rate codes.  
5 Costs are in the CCOS. If allocation to rate code is to be based on usage determinants, the  
6 data is available in Company CCOS. Further information from the Company Billing system  
7 would be needed to ensure correct representation of the rate code.

8 d. The Company does not have a clear approach to associate these expenses to rate codes.  
9 Expenses are in the CCOS. If allocation to rate code is to be based on usage determinants,  
10 the data is available in Company CCOS. Further information from the Company Billing  
11 system would be needed to ensure correct representation of the rate code. Elements of the  
12 data may be contained in the company Work Management System, Mapping System,  
13 Property Records System and Billing System. The Company is unaware of a data key to  
14 associate the data and produce the requested output.

15 Information provided by: Brad Lutz

16  
17 *DR 16 & 87: What is Evergy MISSOURI METRO's estimate of the cost to estimate primary*  
18 *distribution system costs and expenses associate with its underground system by rate code?*  
19

20 Response: The Company has not prepared an estimate of cost for this specific facility type.  
21 Please refer to Company testimony concerning the estimates prepared.

22 Class level data available in CCOS. Expressing by rate code would require identification of  
23 an allocation method. If the allocation method relies on existing data within the same CCOS,  
24 there would be no additional cost.

25 Information provided by: Brad Lutz

26  
27 *DR 17 & 88: What is Evergy MISSOURI METRO's estimate of the cost to estimate primary*  
28 *distribution system costs and expenses associate with its overhead system by rate code?*  
29

30 Response: The Company has not prepared an estimate of cost for this specific facility type.  
31 Please refer to Company testimony concerning the estimates prepared.

32 Class level data available in CCOS. Expressing by rate code would require identification of  
33 an allocation method. If the allocation method relies on existing data within the same CCOS,  
34 there would be no additional cost.

35 Information provided by: Brad Lutz

36  
37 *DR 20 & 91: (a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify*  
38 *primary distribution costs by rate code? (b) In Evergy MISSOURI METRO's opinion, what*  
39 *data is necessary to identify primary distribution operations expenses by rate code? (c) In*  
40 *Evergy MISSOURI METRO's opinion, what data is necessary to identify primary*  
41 *distribution maintenance expenses by rate code? (d) In Evergy MISSOURI METRO's*  
42 *opinion, which systems contain the data that is necessary to identify primary distribution*  
43 *costs by rate code?*  
44

45 Evergy Metro Response:

46 a. See #16

1 b. See #16

2 c. The Company does not have a clear approach to associate these costs to rate codes. Costs  
3 are in the CCOS. If allocation to rate code is to be based on usage determinants, the data is  
4 available in Company CCOS. Further information from the Company Billing system would  
5 be needed to ensure correct representation of the rate code.

6 d. The Company does not have a clear approach to associate these expenses to rate codes.  
7 Expenses are in the CCOS. If allocation to rate code is to be based on usage determinants,  
8 the data is available in Company CCOS. Further information from the Company Billing  
9 system would be needed to ensure correct representation of the rate code. Elements of the  
10 data may be contained in the company Work Management System, Mapping System,  
11 Property Records System and Billing System. The Company is unaware of a data key to  
12 associate the data and produce the requested output.

13 Information provided by: Brad Lutz

14  
15 Everygy West Response:

16 a. See #87

17 b. See #87

18 c. The Company does not have a clear approach to associate these costs to rate codes. Costs  
19 are in the CCOS. If allocation to rate code is to be based on usage determinants, the data is  
20 available in Company CCOS. Further information from the Company Billing system would  
21 be needed to ensure correct representation of the rate code.

22 d. The Company does not have a clear approach to associate these expenses to rate codes.  
23 Expenses are in the CCOS. If allocation to rate code is to be based on usage determinants,  
24 the data is available in Company CCOS. Further information from the Company Billing  
25 system would be needed to ensure correct representation of the rate code. Elements of the  
26 data may be contained in the company Work Management System, Mapping System,  
27 Property Records System and Billing System. The Company is unaware of a data key to  
28 associate the data and produce the requested output.

29 Information provided by: Brad Lutz

30  
31 *DR 21 & 92: What is Everygy MISSOURI METRO's estimate of the cost to estimate secondary*  
32 *distribution system costs and expenses associated with its underground system by rate code?*  
33

34 Response: The Company has not prepared an estimate of cost for this specific facility type.  
35 Please refer to Company testimony concerning the estimates prepared.  
36 Class level data available in CCOS. Expressing by rate code would require identification of  
37 an allocation method. If the allocation method relies on existing data within the same CCOS,  
38 there would be no additional cost.

39 Information provided by: Brad Lutz

40  
41 *DR 22 & 93: What is Everygy MISSOURI METRO's estimate of the cost to estimate secondary*  
42 *distribution system costs and expenses associated with its overhead system by rate code?*  
43

44 Response: The Company has not prepared an estimate of cost for this specific facility type.  
45 Please refer to Company testimony concerning the estimates prepared.

1 Class level data available in CCOS. Expressing by rate code would require identification of  
2 an allocation method. If the allocation method relies on existing data within the same CCOS,  
3 there would be no additional cost.

4 Information provided by: Brad Lutz

5  
6 *DR 23 & 94: (a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify*  
7 *secondary distribution costs by rate code? (b) In Evergy MISSOURI METRO's opinion, what*  
8 *data is necessary to identify secondary distribution operations expenses by rate code? (c) In*  
9 *Evergy MISSOURI METRO's opinion, what data is necessary to identify secondary*  
10 *distribution maintenance expenses by rate code? (d) In Evergy MISSOURI METRO's*  
11 *opinion, which systems contain the data that is necessary to identify secondary distribution*  
12 *costs by rate code?*

13  
14 Evergy Metro Response:

15 a. See #21

16 b. See #21

17 c. The Company does not have a clear approach to associate these expenses to rate codes.  
18 Expenses are in the CCOS. If allocation to rate code is to be based on usage determinants,  
19 the data is available in Company CCOS. Further information from the Company Billing  
20 system would be needed to ensure correct representation of the rate code. Elements of the  
21 data may be contained in the company Work Management System, Mapping System,  
22 Property Records System and Billing System. The Company is unaware of a data key to  
23 associate the data and produce the requested output.

24 d. The Company does not have a clear approach to associate these costs to rate codes. Costs  
25 are in the CCOS. If allocation to rate code is to be based on usage determinants, the data is  
26 available in Company CCOS. Further information from the Company Billing system would  
27 be needed to ensure correct representation of the rate code.

28 Information provided by: Brad Lutz

29  
30 Evergy West Response:

31 a. See #92

32 b. See #92

33 c. The Company does not have a clear approach to associate these expenses to rate codes.  
34 Expenses are in the CCOS. If allocation to rate code is to be based on usage determinants,  
35 the data is available in Company CCOS. Further information from the Company Billing  
36 system would be needed to ensure correct representation of the rate code. Elements of the  
37 data may be contained in the company Work Management System, Mapping System,  
38 Property Records System and Billing System. The Company is unaware of a data key to  
39 associate the data and produce the requested output.

40 d. The Company does not have a clear approach to associate these costs to rate codes. Costs  
41 are in the CCOS. If allocation to rate code is to be based on usage determinants, the data is  
42 available in Company CCOS. Further information from the Company Billing system would  
43 be needed to ensure correct representation of the rate code.

44 Information provided by: Brad Lutz

45

1 *DR 24 & 95: (a)What is Evergy MISSOURI METRO's estimate of the cost to estimate primary*  
2 *voltage service drop costs and expenses associated with its underground system by rate*  
3 *code? (b) What is Evergy MISSOURI METRO's estimate of the cost to estimate primary*  
4 *voltage service drop costs and expenses associated with its overhead system by rate code?*  
5 *(c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify primary*  
6 *voltage service drop costs by rate code? (d) In Evergy MISSOURI METRO's opinion, what*  
7 *data is necessary to identify primary voltage service drop operations expenses by rate code?*  
8 *(e) In Evergy MISSOURI METRO's opinion, what data is necessary to identify primary*  
9 *voltage service drop maintenance expenses by rate code?*

10  
11 Response:

- 12 a. The Company has not prepared an estimate of cost for this specific facility type. Please  
13 refer to Company testimony concerning the estimates prepared.  
14 b. See part a.  
15 c. Expenses can be identified through Company accounting records. The Company does not  
16 have a clear approach to associate these costs to rate codes. Data or logic required to associate  
17 the expenses to a rate code are not part of the Company systems.  
18 d. See part c.

19 Information provided by: Brad Lutz  
20

21 *DR 25 & 96: In Evergy MISSOURI METRO's opinion, which systems contain the data that is*  
22 *necessary to identify primary voltage service drop costs by rate code?*  
23

24 Response: Costs can be identified through Company accounting records. The Company does  
25 not have a clear approach to associate these costs to rate codes. Data or logic required to  
26 associate these costs to a rate code are not part of the Company systems.

27 Information provided by: Brad Lutz  
28

29 *DR 26 & 97: What is Evergy MISSOURI METRO's estimate of the cost to estimate service*  
30 *drop costs and expenses by rate code?*  
31

32 Response: The Company has not prepared an estimate of cost for this specific facility type.  
33 Please refer to Company testimony concerning the estimates prepared.  
34 The Company does not have a clear approach to associate these costs to rate codes. Class  
35 level data available in CCOS. Expressing by rate code would require identification of an  
36 allocation method. If the allocation method relies on existing data within the same CCOS,  
37 there would be no additional cost.

38 Information provided by: Brad Lutz  
39

40 *DR 28 & 99: (a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify*  
41 *line extension costs and contributions by rate code? (b) In Evergy MISSOURI METRO's*  
42 *opinion, what data is necessary to identify line extension operations expenses by rate code?*  
43 *(c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify line extension*  
44 *maintenance expenses by rate code? (d) In Evergy MISSOURI METRO's opinion, which*  
45 *systems contain the data that is necessary to identify line extension costs and contributions*  
46 *by rate code?*



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Response:

- a. Costs can be identified through Company accounting records. The Company does not have a clear approach to associate these costs to rate codes. Data or logic required to associate the expenses to a rate code are not part of the Company systems.
- b. Expenses can be identified through Company accounting records. The Company does not have a clear approach to associate these costs to rate codes. Data or logic required to associate the expenses to a rate code are not part of the Company systems.
- c. Expenses can be identified through Company accounting records. The Company does not have a clear approach to associate these costs to rate codes. Data or logic required to associate the expenses to a rate code are not part of the Company systems.
- d. Elements of the data needed may be contained in the company Work Management System, Mapping System, Property Records System and Billing System. The Company is unaware of a data key to associate the data and produce the requested output.

Information provided by: Brad Lutz

*DR 29 & 100: (a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Poles costs by voltage? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Poles operations expenses by voltage? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Poles maintenance expenses by voltage? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify Poles costs, operations expenses, and maintenance expenses by voltage?*

Response:

- a. Costs can be identified through Company accounting records. The Company does not have a clear approach to associate these costs to voltage. Data or logic required to associate the expenses to a voltage are not part of the Company systems.
- b. Expenses can be identified through Company accounting records. The Company does not have a clear approach to associate these costs to voltage. Data or logic required to associate the expenses to a voltage are not part of the Company systems.
- c. Expenses can be identified through Company accounting records. The Company does not have a clear approach to associate these costs to voltage. Data or logic required to associate the expenses to a voltage are not part of the Company systems.
- d. Elements of the data needed may be contained in the company Work Management System, Mapping System, Property Records System and Billing System. The Company is unaware of a data key to associate the data and produce the requested output.

Information provided by: Brad Lutz

*DR 33 & 104: (a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground conduit costs by voltage? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground conduit operations expenses by voltage? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground conduit maintenance expenses by voltage? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify Underground conduit costs, operations expenses, and maintenance expenses by voltage?*

1 Response:

2 a. Costs can be identified through Company accounting records. The Company does not have  
3 a clear approach to associate these costs to voltage. Data or logic required to associate the  
4 expenses to a voltage are not part of the Company systems.

5 b. Expenses can be identified through Company accounting records. The Company does not  
6 have a clear approach to associate these costs to voltage. Data or logic required to associate  
7 the expenses to a voltage are not part of the Company systems.

8 c. Expenses can be identified through Company accounting records. The Company does not  
9 have a clear approach to associate these costs to voltage. Data or logic required to associate  
10 the expenses to a voltage are not part of the Company systems.

11 d. Elements of the data needed may be contained in the company Work Management System,  
12 Mapping System, Property Records System and Billing System. The Company is unaware  
13 of a data key to associate the data and produce the requested output.

14 Information provided by: Brad Lutz

15  
16 *DR 37 & 108: (a) In Every MISSOURI METRO's opinion, what data is necessary to identify*  
17 *Overhead conductor costs by voltage? (b) In Every MISSOURI METRO's opinion, what*  
18 *data is necessary to identify Overhead conductor operations expenses by voltage? (c) In*  
19 *Every MISSOURI METRO's opinion, what data is necessary to identify Overhead*  
20 *conductor maintenance expenses by voltage? (d) In Every MISSOURI METRO's opinion,*  
21 *which systems contain the data that is necessary to identify Overhead conductor costs,*  
22 *operations expenses, and maintenance expenses by voltage?*  
23

24 Response:

25 a. Costs can be identified through Company accounting records. The Company does not have  
26 a clear approach to associate these costs to voltage. Data or logic required to associate the  
27 expenses to a voltage are not part of the Company systems.

28 b. Expenses can be identified through Company accounting records. The Company does not  
29 have a clear approach to associate these costs to voltage. Data or logic required to associate  
30 the expenses to a voltage are not part of the Company systems.

31 c. Expenses can be identified through Company accounting records. The Company does not  
32 have a clear approach to associate these costs to voltage. Data or logic required to associate  
33 the expenses to a voltage are not part of the Company systems.

34 d. Elements of the data needed may be contained in the company Work Management System,  
35 Mapping System, Property Records System and Billing System. The Company is unaware  
36 of a data key to associate the data and produce the requested output.

37 Information provided by: Brad Lutz

38  
39 *DR 42 & 113: In Every MISSOURI METRO's opinion, what data is necessary to identify*  
40 *Underground conductor costs by voltage? (b) In Every MISSOURI METRO's opinion, what*  
41 *data is necessary to identify Underground conductor operations expenses by voltage? (c) In*  
42 *Every MISSOURI METRO's opinion, what data is necessary to identify Underground*  
43 *conductor maintenance expenses by voltage? (d) In Every MISSOURI METRO's opinion,*  
44 *which systems contain the data that is necessary to identify Underground conductor costs,*  
45 *operations expenses, and maintenance expenses by voltage?*  
46

1 Response:

2 a. Costs can be identified through Company accounting records. The Company does not have  
3 a clear approach to associate these costs to voltage. Data or logic required to associate the  
4 expenses to a voltage are not part of the Company systems.

5 b. Expenses can be identified through Company accounting records. The Company does not  
6 have a clear approach to associate these costs to voltage. Data or logic required to associate  
7 the expenses to a voltage are not part of the Company systems.

8 c. Expenses can be identified through Company accounting records. The Company does not  
9 have a clear approach to associate these costs to voltage. Data or logic required to associate  
10 the expenses to a voltage are not part of the Company systems.

11 d. Elements of the data needed may be contained in the company Work Management System,  
12 Mapping System, Property Records System and Billing System. The Company is unaware  
13 of a data key to associate the data and produce the requested output.

14 Information provided by: Brad Lutz

15  
16 *DR 47 & 118: (a) In Every MISSOURI METRO's opinion, what data is necessary to identify*  
17 *Overhead devices costs by voltage? (b) In Every MISSOURI METRO's opinion, what data*  
18 *is necessary to identify Overhead devices operations expenses by voltage? (c) In Every*  
19 *MISSOURI METRO's opinion, what data is necessary to identify Overhead devices*  
20 *maintenance expenses by voltage? (d) In Every MISSOURI METRO's opinion, which*  
21 *systems contain the data that is necessary to identify Overhead devices costs, operations*  
22 *expenses, and maintenance expenses by voltage?*  
23

24 Response:

25 a. Costs can be identified through Company accounting records. The Company does not have  
26 a clear approach to associate these costs to voltage. Data or logic required to associate the  
27 expenses to a voltage are not part of the Company systems.

28 b. Expenses can be identified through Company accounting records. The Company does not  
29 have a clear approach to associate these costs to voltage. Data or logic required to associate  
30 the expenses to a voltage are not part of the Company systems.

31 c. Expenses can be identified through Company accounting records. The Company does not  
32 have a clear approach to associate these costs to voltage. Data or logic required to associate  
33 the expenses to a voltage are not part of the Company systems.

34 d. Elements of the data needed may be contained in the company Work Management System,  
35 Mapping System, Property Records System and Billing System. The Company is unaware  
36 of a data key to associate the data and produce the requested output.

37 Information provided by: Brad Lutz

38  
39 *DR 51 & 122: (a) In Every MISSOURI METRO's opinion, what data is necessary to identify*  
40 *Underground devices costs by voltage? (b) In Every MISSOURI METRO's opinion, what*  
41 *data is necessary to identify Underground devices operations expenses by voltage?(c) In*  
42 *Every MISSOURI METRO's opinion, what data is necessary to identify Underground*  
43 *devices maintenance expenses by voltage? (d) In Every MISSOURI METRO's opinion,*  
44 *which systems contain the data that is necessary to identify Underground devices costs,*  
45 *operations expenses, and maintenance expenses by voltage?*  
46

1 Response:

2 a. Costs can be identified through Company accounting records. The Company does not have  
3 a clear approach to associate these costs to voltage. Data or logic required to associate the  
4 expenses to a voltage are not part of the Company systems.

5 b. Expenses can be identified through Company accounting records. The Company does not  
6 have a clear approach to associate these costs to voltage. Data or logic required to associate  
7 the expenses to a voltage are not part of the Company systems.

8 c. Expenses can be identified through Company accounting records. The Company does not  
9 have a clear approach to associate these costs to voltage. Data or logic required to associate  
10 the expenses to a voltage are not part of the Company systems.

11 d. Elements of the data needed may be contained in the company Work Management System,  
12 Mapping System, Property Records System and Billing System. The Company is unaware  
13 of a data key to associate the data and produce the requested output.

14 Information provided by: Brad Lutz

15  
16 *DR 55 & 126: (a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify*  
17 *the costs associated with distribution infrastructure operating at a primary voltage utilized*  
18 *by a single customer? (b) In Evergy MISSOURI METRO's opinion, what data is necessary*  
19 *to identify the operations expenses associated with distribution infrastructure operating at a*  
20 *primary voltage utilized by a single customer? (c) In Evergy MISSOURI METRO's opinion,*  
21 *what data is necessary to identify the maintenance expenses associated with distribution*  
22 *infrastructure operating at a primary voltage utilized by a single customer? (d) In Evergy*  
23 *MISSOURI METRO's opinion, which systems contain the data that is necessary to identify*  
24 *the costs, operations expenses, and maintenance expenses associated with distribution*  
25 *infrastructure operating at a primary voltage utilized by a single customer?*  
26

27 Response:

28 a. Data or logic required to associate the costs to infrastructure utilized by a single customer  
29 are not part of the Company systems.

30 b. Data or logic required to associate the expenses to infrastructure utilized by a single  
31 customer are not part of the Company systems.

32 c. Data or logic required to associate the expenses to infrastructure utilized by a single  
33 customer are not part of the Company systems.

34 d. Elements of the data needed may be contained in the Company Work Management  
35 System, Mapping System, Property Records System and Billing System. The Company is  
36 unaware of a data key to associate the data and produce the requested output.

37 Information provided by: Brad Lutz

38  
39 *DR 57 & 128 (a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify*  
40 *the costs associated with distribution infrastructure operating at a secondary voltage utilized*  
41 *by a single customer not recorded to a services or line transformer account? (b) In Evergy*  
42 *MISSOURI METRO's opinion, what data is necessary to identify the operations expenses*  
43 *associated with distribution infrastructure operating at a secondary voltage utilized by a*  
44 *single customer not recorded to a services or line transformer account? (c) In Evergy*  
45 *MISSOURI METRO's opinion, what data is necessary to identify the maintenance expenses*  
46 *associated with distribution infrastructure operating at a secondary voltage utilized by a*

1 *single customer not recorded to a services or line transformer account? (d) In Evergy*  
2 *MISSOURI METRO's opinion, which systems contain the data that is necessary to identify*  
3 *the costs, operations expenses, and maintenance expenses associated with distribution*  
4 *infrastructure operating at a secondary voltage utilized by a single customer not recorded*  
5 *to a services or line transformer account? (e) Please provide the number of the locations at*  
6 *which distribution infrastructure operating at a secondary voltage utilized by a single*  
7 *customer occurs on Evergy MISSOURI METRO's system, where such infrastructure is not*  
8 *recorded to a services or line transformer account. (f) Please identify Evergy MISSOURI*  
9 *METRO's estimate of the number of customer locations at which distribution infrastructure*  
10 *operating at a primary voltage is utilized by a single customer, where such infrastructure is*  
11 *not recorded to a services or line transformer account. (g) Please identify the number of*  
12 *working hours Evergy MISSOURI METRO anticipates would be required to survey 100*  
13 *randomly selected locations where distribution infrastructure operates at a secondary*  
14 *voltage utilized by a single customer, and determine the associated property units and*  
15 *quantities.*

16  
17 Response:

- 18 a. Data or logic required to identify infrastructure utilized by a single customer are not part  
19 of the Company systems.  
20 b. Data or logic required to identify infrastructure utilized by a single customer are not part  
21 of the Company systems.  
22 c. Data or logic required to identify infrastructure utilized by a single customer are not part  
23 of the Company systems.  
24 d. Elements of the data needed would be contained in the company Work Management  
25 System, Mapping System, Property Records System and Billing System. The Company is  
26 unaware of a data key to associate the data and produce the requested output.  
27 e. Data or logic required to identify infrastructure utilized by a single customer are not part  
28 of the Company systems.  
29 f. Data or logic required to identify infrastructure utilized by a single customer are not part  
30 of the Company systems.  
31 g. The Company has not performed the analysis to offer such an estimate. As this scenario  
32 is reliant on manual work, interacting with various systems, the Company cannot offer a  
33 reliable estimate of the hours required

34 Information provided by: Brad Lutz  
35

36 *DR 58 & 129: (a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify*  
37 *the costs associated with transmission or subtransmission infrastructure utilized by a single*  
38 *customer not recorded to a services or line transformer account? (b) In Evergy MISSOURI*  
39 *METRO's opinion, what data is necessary to identify the operations expenses associated with*  
40 *transmission or subtransmission infrastructure utilized by a single customer not recorded to*  
41 *a services or line transformer account? (c) In Evergy MISSOURI METRO's opinion, what*  
42 *data is necessary to identify the maintenance expenses associated with transmission or*  
43 *subtransmission infrastructure utilized by a single customer not recorded to a services or*  
44 *line transformer account? (d) In Evergy MISSOURI METRO's opinion, which systems*  
45 *contain the data that is necessary to identify the costs, operations expenses, and maintenance*  
46 *expenses associated with transmission or subtransmission infrastructure utilized by a single*

1 *customer not recorded to a services or line transformer account? (e) Please identify the*  
2 *number of working hours Evergy MISSOURI METRO anticipates would be required to*  
3 *survey 100 randomly selected locations where transmission or subtransmission*  
4 *infrastructure is utilized by a single customer, and determine the associated property units*  
5 *and quantities. (f) Please identify Evergy MISSOURI METRO's estimate of the number of*  
6 *customer locations at which transmission or subtransmission infrastructure is utilized by a*  
7 *single customer.*

8  
9 Response:

- 10 a. Data or logic required to identify infrastructure utilized by a single customer are not part  
11 of the Company systems.  
12 b. Data or logic required to identify infrastructure utilized by a single customer are not part  
13 of the Company systems.  
14 c. Data or logic required to identify infrastructure utilized by a single customer are not part  
15 of the Company systems.  
16 d. Elements of the data needed would be contained in the company Work Management  
17 System, Mapping System, Property Records System and Billing System. The Company is  
18 unaware of a data key to associate the data and produce the requested output.  
19 e. The Company has not performed the analysis to offer such an estimate. As this scenario is  
20 reliant on manual work, interacting with various systems, the Company cannot offer a  
21 reliable estimate of the hours required.  
22 f. Data or logic required to identify infrastructure utilized by a single customer are not part  
23 of the Company systems.

24 Information provided by: Brad Lutz

25  
26 *DR 59 & 130: (a) What is Evergy MISSOURI METRO's estimate of the cost to estimate meter*  
27 *costs and expenses by rate code? (b) For each Evergy MISSOURI METRO rate code,*  
28 *please identify the voltages at which customers may be served, and the number of*  
29 *customers served at each voltage as of July 1, 2023, July 31, as of October 1, 2023, and as*  
30 *of October 31, 2023.*

31  
32 Response:

- 33 a. The Company has not prepared an estimate of cost for this specific facility type. Please  
34 refer to Company testimony concerning the estimates prepared.  
35 Class level data available in CCOS. Expressing by rate code would require identification of  
36 an allocation method. If the allocation method relies on existing data within the same CCOS,  
37 there would be no additional cost.  
38 b. Reporting of ""customers by voltage"" is one of the items examined by the Company in  
39 its Direct testimony. Available details are offered there.

40 Information provided by: Brad Lutz

41  
42 *DR 63 & 134: (a) In Evergy's opinion what data is necessary to identify meter costs by voltage*  
43 *and rate code? (b) In what systems are the data necessary to identify meter costs by voltage*  
44 *and rate code stored?*

1 Response:

2 a. Data or logic required to identify meter costs by voltage and rate code are not part of the  
3 Company systems.

4 b. Elements of the data needed may be contained in the company Work Management System,  
5 Mapping System, Property Records System and Billing System. The Company is unaware  
6 of a data key to associate the data and produce the requested output.

7 Information provided by: Brad Lutz

8 Q. Why did Staff request individual cost estimates of the items included in the  
9 2022 Stipulation and Agreement?

10 A. Staff is aware of the lack of cross-references included in the accounting, plant  
11 record, and operating record data systems of Evergy Missouri Metro and Evergy Missouri West.  
12 Staff is also aware of the history of Evergy Missouri West and the fact that records may have  
13 been lost or compromised through the purchase of St. Joseph Light and Power, and the  
14 transition of Missouri Public Service to Utilicorp United, and then to Aquila, and its purchase  
15 by Great Plains Energy. If Evergy made a good faith estimate that it would cost \$5 million  
16 dollars to figure out how many service drops are used by residential customers versus small  
17 general service customers versus large general service customers, Staff would not recommend  
18 using \$5 million dollars to better allocate the balance of this relatively small account. However,  
19 if a few thousand dollars would support the survey of poles by voltage, and that poles' study  
20 could be used to make educated inferences about overhead conductor cost by voltage, then Staff  
21 likely would support that relatively small expenditure as necessary. In other words, while Staff  
22 entered the 2022 Stipulation and Agreement believing it was bargaining for delivery of actual  
23 data, Staff also entered the 2022 Stipulation and Agreement bargaining for the delivery of  
24 information to prioritize data that was reasonably available versus that which is unjustifiably  
25 expensive to provide.

1 Q. If Evergy did not attempt individual cost estimates of items as different as  
2 meters and transmission towers, what reasonable conclusion can you draw about the quality of  
3 Evergy's total cost estimate for the distribution plant and expense cost estimates?

4 A. I can conclude that Evergy did not make a good faith effort to comply with  
5 provision of cost estimates for the provision of distribution cost and expense information. As  
6 a simple example, if Evergy cannot tell you the cost to buy a slice of cheese, nor the cost to buy  
7 raw beef, nor the cost to put a skillet on a stove, nor can Evergy tell you what a cheeseburger  
8 is, it would not be reasonable to rely on an Evergy estimate that a cheeseburger cannot be  
9 cooked for less than a million dollars.

10 Q. Why is distribution system cost by voltage an appropriate area for further study?

11 A. Evergy's rate schedules exempt customers from paying system costs that  
12 customers are assumed not to use. For example, it is assumed that customers taking service at  
13 substation voltage do not use distribution plant that operates at a primary or secondary voltage.  
14

	<b>Costs and Expenses Allocated to Customers</b>			
<b>Voltage at which Customer Receives Service</b>	Transmission System	Substations	Primary Distribution System	Secondary Distribution System
Transmission	Green	Red	Red	Red
Substation	Green	Green	Red	Red
Primary	Green	Green	Green	Red
Secondary	Green	Green	Green	Green

15  
16 For this reason, with Evergy Metro and Evergy West rate schedules, different rates are  
17 paid by customers taking service at different voltages. The differences in these rates is more  
18 than the differences attributable to line losses or voltage conversion of billing units.



1 Q. When was the last time a serious study of the cost of plant operating at different  
2 voltages within each distribution plant account was conducted for Evergy Metro or Evergy  
3 West?

4 A. I have participated in some capacity in the rate design and class cost of service  
5 issues in every Aquila, KCPL, KCPL-GMO, Evergy Metro, and Evergy West rate case filed  
6 since 2006. I do not recall that a comprehensive study has occurred during that time period.  
7 However, I am under the impression that KCPL (Evergy Metro) was the subject of such a study  
8 during the 1990s. Since that time, ice storms, customer additions, and Plant in Service  
9 Accounting (PISA) have dramatically reshaped the distribution systems of Evergy Metro and  
10 Evergy West.

11 Q. Was the data Evergy was able to provide in the ER-2022-0129/0130 rate cases  
12 sufficiently reliable to inform reasonable rate design and compliance rate calculation?

13 A. No. It was not.<sup>29</sup>

14 **1992 NARUC Manual Distribution Allocation Guidance**

15 Q. At pages 14 – 15, Mr. Lutz offers his opinion that:

16 Q: In your opinion, why has this data has been requested by the Staff?

17 A: Staff is under the opinion that current cost allocation methods are  
18 insufficient to support ratemaking, mainly in differentiating distribution  
19 plant costs by voltage. Further, Staff believes the data requested is  
20 needed to support development of rate design structures they endorse.  
21 The views concerning cost of service first took shape in an Ameren  
22 Missouri rate case, ER-2019-0335, expressed in the Rebuttal Testimony  
23 of Sarah L.K. Lange. In that testimony, Staff supported guidance

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<sup>29</sup> In File No. ER-2022-0337, an Ameren Missouri rate case, similar concerns existed. In its Report and Order in that case at page 23, the Commission found “The Commission finds none of the parties’ CCOSSs suitable for setting rates that are just and reasonable in this rate case. The Commission finds Staff’s concerns about Ameren Missouri’s CCOSS credible. The Commission finds Staff’s CCOSS insufficient for allocating class revenue responsibilities because Staff was unable to obtain the necessary information to complete more than an interim step toward its goal of rate modernization. MECG and MEIC’s modifications to Ameren Missouri’s CCOSS do not address the underlying problems with the CCOSS they modify.”

1 published by the Regulatory Assistance Project (“RAP”), titled “Electric  
2 Cost Allocation for a New Era,” by Jim Lazar, Paul Chernick and  
3 William Marcus, edited by Mark LeBel. These views extended into the  
4 Liberty Utilities rate case, ER-2019-0374 and Evergy rate cases, ER-  
5 2022-0129/0130. Most recently these views toward class cost of service  
6 studies were addressed again in Ameren rate case ER2022-0337. The  
7 views concerning rate design structures have been more aligned with  
8 Staff’s visions for rate design and with data made available with the  
9 Automated Metering Infrastructure (“AMI”) deployments and I believe  
10 originated within the Evergy rate cases ER-2022-0129/0130 and again  
11 appeared in Ameren rate case ER-2022-0337. The Staff views parallel  
12 those offered by RAP in their report “Smart Rate Design for a Smart  
13 Future.” If I understand the Staff intentions correctly, they prefer to  
14 ultimately move all customers to a rate structure similar to the following  
15 example from the RAP report [TABLE OMMITED] As Staff has  
16 brought these cost allocation methods and rate design alternatives  
17 forward, they have sought data from the Company to support them.

18 To what extent is Mr. Lutz’s opinion accurate?

19 A. It is accurate that Staff has reviewed the RAP CCOS manual, and finds it a useful  
20 resource. However, the particular elements addressed in the 2022 Stipulation and Agreement  
21 are necessary for reasonable CCOS study of existing rate schedules, and are needed to evaluate  
22 intraclass rate design. These items are actually addressed in the 1992 NARUC Cost Allocation  
23 Manual. I will address the more relevant NARUC Manual provisions:

- 24 • NARUC Manual at page 74, “Radial transmission facilities represent those facilities that are  
25 not networked with other transmission facilities, but are used to serve specific loads directly.  
26 For cost of service purposes, these facilities may be directly assigned to specific customers  
27 on the theory that these facilities are not used or useful in providing service to customers not  
28 directly connected to them.”
- 29 • NARUC Manual at page 87, “Assignment or “exclusive use” costs are assigned directly to  
30 the customer class or group which exclusively uses such facilities. The remaining costs are  
31 then classified to the respective cost components.”
- 32 • NARUC Manual at page 88, “Direct assignment or ‘exclusive use’ costs are assigned directly  
33 to the customer class or group which exclusively uses such facilities. The remaining costs  
34 are then classified to the respective cost components.”

- 1 • NARUC Manual at 90-91, regarding embedded cost of service studies, “Classifying  
2 distribution plant with the minimum-size method **assumes that a minimum size**  
3 **distribution can be built to serve the minimum loading requirements of the customer.** The  
4 minimum-size method involves determining the minimum size pole, conductor, cable,  
5 transformer, and service that is currently installed by the utility. Normally, the average book  
6 cost for each piece of equipment determines the price of all installed units. Once determined  
7 for each primary plant account, the minimum size distribution system is classified as  
8 customer-related costs. The demand-related costs for each account are the difference  
9 between the total investment in the account and customer-related costs. Comparative studies  
10 between the minimum-size and other methods show that it generally produces a larger  
11 customer component than the zero-intercept method (to be discussed).” [Emphasis added.]
- 12 • NARUC Manual at page 95:  
13 Cost analysts disagree on how much of the demand costs should be allocated  
14 to customers when the minimum-size distribution method is used to  
15 classify distribution plant. **When using this distribution method, the analyst**  
16 **must be aware that the minimum size distribution equipment has a certain**  
17 **load-carrying capability, which can be viewed as a demand-related cost.**
- 18 When allocating distribution costs determined by the minimum-size method,  
19 some cost analysis will argue that some customer classes can receive a  
20 disproportionate share of demand costs. Their rationale is that customers are  
21 allocated a share of distribution costs classified as demand-related. Then those  
22 **customers receive a second layer of demand costs that have been mislabeled**  
23 **customer costs because the minimum-size method was used to classify those**  
24 **costs.**
- 25 Advocates of the minimum-intercept method contend that this problem does not  
26 exist when using their method. The reason is that the customer cost derived from  
27 the minimum-intercept method is based upon the zero-load intercept of the cost  
28 curve. Thus the customer cost of a particular piece of equipment has no demand  
29 cost in it whatsoever. [Emphasis added.]
- 30 • NARUC Manual at page 98, “While customer allocation factors should be weighted to offset  
31 differences among various types of customers, highly refined weighting factors or detailed  
32 and time consuming studies may not seem worthwhile. **Such factors applied in this final**  
33 **step of the cost study may affect the final results much less than such basic assumptions**  
34 **as the demand-allocation method or the technique for determining demand-customer**  
35 **classifications.” [Emphasis added.]**
- 36 • NARUC Manual at page 136, regarding marginal cost studies, “Most analysts agree that  
37 distribution equipment that is uniquely dedicated to individual customers or specific  
38 customer classes can be classified as customer rather than demand related. Customer  
39 premises equipment (meters and service drops) are generally functionalized as customer  
40 rather than distribution costs and, in reality, this is the only equipment that is directly  
41 assignable for all customers, even the smallest ones. Beyond the customers’ premises,  
42 however, there are distribution costs that may be classified as customer related. For example,  
43 some jurisdictions classify line transformers as customer-related often using a proxy based

1 on average load as the allocation factor when this equipment is not uniquely dedicated to  
2 individual customers. In addition, **for very large customers, more than merely meters,**  
3 **services, and transformers are directly assignable. Some have entire substations**  
4 **dedicated to them. As noted above in “Transmission,” distribution costs of equipment**  
5 **dedicated to individual customers can be directly assigned to them, thus reducing the**  
6 **common distribution costs assignable to the remainder of the class.” [Emphasis added.]**

7 • NARUC Manual at page 138, regarding marginal cost studies:

8 The minimum grid approach re-designs the distribution system to determine the  
9 cost in current year dollars of a **hypothetical system that would serve all**  
10 **customers with voltage but not power (or with minimum demand of 0.5**  
11 **KW), yet still satisfy the minimum standards for pole height and efficient**  
12 **conductor and transformer size. The calculations can be based either on the**  
13 **system as a whole or on a sample of areas reflecting different geographical,**  
14 **service and customer density characteristics.**

15 When applying this approach, it is necessary to **take care that the minimum**  
16 **size equipment being analyzed is, in fact, the minimum-sized equipment**  
17 **available, and not merely the minimum the minimum size stocked by the**  
18 **company or usually installed by the company. To the degree that the**  
19 **equipment being costed is larger than a true minimum, the minimum grid**  
20 **calculation will include costs more properly allocated to demand. [Emphasis**  
21 **added.]**

22 • NARUC Manual providing the methodologies for determining the minimum size of  
23 distribution plant for use in calculating the customer-classified portion of the minimum-size  
24 method, at page 91 The entirety of the entries for Accounts 365 and 367 are set out below:

25 2. Account 365 – Overhead Conductors and Devices

26 - Determine minimum size conductor currently being installed.

27 - Multiply average installed book cost per mile of minimum size conductor by  
28 the number of circuit miles to determine the customer component. Balance of  
29 plant account is demand component. (Note: two conductors in minimum system.)

30 3. Accounts 366 and 367 – Underground Conduits, Conductors, and  
31 Devices

32 - Determine minimum size cable currently being installed.

33 - Multiply average installed book cost per mile of minimum size cable by the  
34 circuit miles to determine the customer component. Note: one cable with ground  
35 sheath is minimum system.) Account 366 conduit is assigned, based on ratio of  
36 cable account.

37 - Multiply average installed book cost of minimum size transformer by number  
38 of transformers in plant account to determine the customer component. Balance  
39 of plant account is demand component.

- 1 • NARUC Manual discussion of applications of the minimum-intercept method, at  
2 pages 93-94:

3 2. Account 365 – Overhead Conductors and Devices

4 - **If accounts are divided between primary and secondary voltages**, develop a  
5 customer component separately for each. The total investment assigned to  
6 primary and secondary; then the customer component is developed for each.  
7 Since conductors generally are of many types and sizes, select those sizes and  
8 types which represent the bulk of the investment in this account, if appropriate.

9 - When developing the customer component, consider only the investment in  
10 conductors, and not in devices such as circuit breakers, insulators, switches, etc.  
11 The investment in these devices will be assigned later between the customer and  
12 demand component, based on the conductor assignment.

13 - Determine the feet, investment and average installed book cost per foot for  
14 distribution conductors by size and type.

15 - Determine minimum intercept of conductor cost per foot using cost per foot by  
16 size and type of conductor weighted by feet or investment in each category, and  
17 developing a cost for the utility's minimum size conductor.

18 - Multiply minimum intercept cost by the total number of circuit feet times 2.  
19 (Note that circuit feet, not conductor feet, are used to get customer component.)

20 - Balance of conductor investment is assigned to demand.

21 - **Total primary or secondary dollars in the account, including devices, are**  
22 **assigned to customer and demand components based on conductor ratio.**

23 3. Accounts 366 and 367 – Underground Conduits, Conductors, and  
24 Devices

25 - The customer demand component ratio is developed for conductors and applied  
26 to conduits. Underground conductors are generally booked by type and size of  
27 conductor for both one conductor (I/c) cable and three-conductor (3/c) cables. If  
28 conductors are booked by voltage, as between primary and secondary, a customer  
29 component is developed for each. If network and URD investments are  
30 segregated, a customer component must be developed for each.

31 - The conductor sizes and types for the customer component derivation are  
32 restricted to I/c cable. Since there are generally many types and sizes of I/c cable,  
33 select those sizes and types which represent the bulk of the investment, when  
34 appropriate.

35 - Determine the feet, investment and average installed book cost per foot for I/c  
36 cables by size and type of cable.

37 - Determine minimum intercept of cable cost per foot using cost per foot by size  
38 and type of cable weighted by feet of investment in each category.

- 1 - Multiply minimum intercept cost by the total number of circuit feet (I/c cable  
2 with sheath is considered a circuit) to get customer component.  
3 - Balance of cable investment is assigned to demand.  
4 - Total dollars in Account 366 and 367 are assigned to customer and demand  
5 components based on conductor investment ratio. **[Emphasis added.]**

6 The information included in the 2022 Stipulation and Agreement and Agreement serve  
7 to provide better informed CCOS studies consistent with the 1992 NARUC manual.  
8 Considering the inclusion of AMI meter investment, multiple data management systems, and  
9 the substantial increase in distribution system investment included in Evergy Missouri Metro's  
10 and Evergy Missouri West's respective rate bases, it is not reasonable to fail to adequately study  
11 the cost allocation of the distribution system.

#### 12 **Rate Modernization**

13 Q. Compared to existing rate structures, is more or less information necessary to  
14 accomplish rate modernization as contemplated by Staff?

15 A. On-Peak NCPs are the only additional information that will be necessary for  
16 modernized rates that is not currently estimated or imputed in some manner. However, Staff  
17 does seek to improve the accuracy of the cost and rate information that is based on unreasonable  
18 or unsupported estimates and imputations.

19 Q. What is Staff's recommended rate modernization plan for Evergy?

20 A. My rebuttal testimony in Case Nos. ER-2022-0129 and 0130 included the  
21 following:

22 The most reasonable path forward from Staff's perspective is:

- 23 1. adoption of voltage and infrastructure specific customer and  
24 facility charges for non-residential customers that vary with the  
25 customer's actual infrastructure and annual (or triennial) NCP,  
26 without regard to customer class,

1 2. transitioning of demand charges to the highest usage in a  
2 pre-established on-peak period, such as 6 am – 10 pm

3 3. adoption of time-based energy rates without an hours use  
4 structure.

5 If these steps are taken, it may be necessary or appropriate to  
6 transition customers to rate codes denominated as “commercial” and  
7 “industrial” based on FERC Form 1 usage of those terms, but separate  
8 rates for each class will be superfluous and no longer necessary or  
9 appropriate.

10 These steps are not apparently inconsistent with Ms. Miller’s  
11 Table 6 at page 25, summarizing the “Future Changes to the Hours Use  
12 Rate Structure,” except that my expectation is that a well-designed rate  
13 element for a customer served on SGS primary is the same as a customer  
14 served on LPS primary, thus negating the need for class distinctions.  
15 Under this approach, there is no need for “bright lines,”

16 Staff is not prioritizing alignment of rate structures or rate  
17 designs with customers of Evergy Kansas Metro, or Evergy Kansas  
18 Central.

19 Q. Was this “reasonable path forward” a surprise to parties to Case Nos.  
20 ER-2022-0129 and 0130?

21 A. This plan should not have been a surprise. In the Staff Report on Distributed  
22 Energy Resources, filed April 5, 2018, in File No. EW 2017-0245, concerning residential and  
23 utility-wide rate design, Staff recommended the following:

24 Initial steps to be taken during or prior to applicable rate cases:

25 a. Residential Rate Design:

- 26 i. Improve customer education regarding cost composition and energy cost  
27 differences over time of day and season.
- 28 ii. Review rates on an unbundled basis, with potential to provide tariffed  
29 rates on an unbundled basis.
- 30 iii. Implement a Low-differential TOU rate design related only to energy  
31 price difference or existing rate design blocks, with relatively long  
32 on-peak periods.
- 33 iv. Study determinants for an on-peak demand charge.

34 \* \* \*

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c. Utility-wide

- i. Study bifurcating Fuel and Purchased Power costs into the TOU time periods for recovery of differences through bifurcated FACs.
- ii. Study distribution of DER on existing system.
- iii. Identify locations on the distribution and transmission systems where DER may be an alternative to expansion or replacement of the system.
- iv. Develop strategies to encourage strategic placement and deployment of DER to reduce overall system investment needs and operation expenses, including transmission congestion including study of locational rate designs and location-dependent compensation schemes.
- v. Study located DER scenarios as part of Chapter 22 planning consistent with Staff’s recommendations contained in Section VII. Changes to IRP process or Chapter 22.
- vi. Study energy cost distribution and system utilization to find opportunities for efficient utilization and pricing – for example, some utilities experience significant winter night and evening usage – to refine time periods applicable to time of use rates and develop super on-peak or super off-peak rates.

Phase 2 (approximately 2025 time frame, will vary by utility and rate case timing):

a. Residential:

- i. Continued and increased customer education regarding cost composition and energy cost differences over time of day and season.
- ii. Increase TOU differential to recover some generation capacity costs on-peak.
- iii. Incorporate super on-peak and super off-peak TOU elements, which may vary by season.
- iv. Implement a 12 month demand charge for recovery associated with local distribution facilities.

\* \* \*

c. Utility-wide

- i. Study distribution locational pricing determinants for locational rate designs; study location-dependent compensation schemes.
- ii. Revenue Decoupling.
- iii. Based on outcomes of studies of beneficial DER location, locate DER or incent the location of DER using reasonably designed compensation designs.

Anticipated goals (approximately 2030 time frame, will vary by utility and rate case timing):



1 a. Residential:

- 2 i. Continued and increased customer education regarding cost composition  
3 and energy cost differences over time of day and season.  
4 ii. Implement on-peak demand charge to nearly fully recover generation  
5 capacity costs on peak, not already included in on-peak and super  
6 on-peak elements.  
7 iii. Consider and implement, if appropriate, distribution locational rates or  
8 rate elements.  
9

10 \* \* \*

11  
12 c. Utility-wide

- 13 i. Study distribution locational pricing determinants.  
14 ii. Based on outcomes of studies of beneficial DER location, locate DER or  
15 incent the location of DER using reasonably designed compensation  
16 designs.

17 **DATA SPOILIATION**

18 Q. Does Staff have any concerns with data spoliation?

19 A. Yes. Staff is concerned that Evergy

20 1) cannot provide customer counts per rate code after a given day is passed,

21 2) cannot access customer usage by rate code after a given hourly interval is passed,

22 without first modifying its billing system, and

23 3) cannot access information to generate demand charge determinants for classes that

24 do not have a demand charge, nor to generate on-peak demands for any class, unless

25 modifications are first made.

26 Q. Have Evergy data request responses confirmed that some sort of manual action  
27 needs to occur on a consistent basis to preserve access to customer counts per rate code?

28 A. Yes. Evergy has stated in this case that it cannot provide customer counts  
29 per rate code without hundreds of hours of work and significant costs. However, Evergy  
30 filed customer counts by rate code weekly in File No. EW-2023-0199. Staff submitted DR 175

1 to better understand this seeming contradiction. DR 175 and Evergy's response are  
2 reproduced below:

3 In File No. EW-2023-0199 Evergy files weekly what it purports to be  
4 the number of customers served on each residential rate schedule as of  
5 an indicated date. (a) Please explain from start to finish how these  
6 customer numbers are summed or calculated. (b) can the same process  
7 be used to provide customer numbers by rate schedule by day or month,  
8 if not, why not, if yes, please explain the timing and intervals at which  
9 such information could be provided. Please provide all pertinent answers  
10 for both Evergy Missouri Metro and Evergy Missouri West. Data  
11 Request submitted by Sarah Lange (sarah.lange@psc.mo.gov).

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

14 (a) A query is executed that counts the number of active service  
15 agreements as of the day/time the query runs for a specific list of rate  
16 codes. The counts are then summarized by rate code within the query.  
17 Each active service agreement has a count of '1' towards the rate code  
18 listed on the service agreement.

19 (b) The process in (a) is a short-term, manually executed, and ad hoc  
20 solution intended to gather a count of service agreements for a subset of  
21 MO residential rate codes where the service agreements are active at the  
22 time the query executes. The query will not gather data for historical  
23 purposes and report counts based on a specific historical date nor will it  
24 provide counts based on a monthly view. In order to provide historical  
25 views of customer counts on either a specific date historically, a specific  
26 month historically, or a month-over-month view, additional queries  
27 would need to be developed for each request to provide those different  
28 data sets. Additionally, the queries would need to be further developed  
29 if request requirements stipulate a one-time data pull or if the data is  
30 required to be pulled regularly at some frequency (e.g., execute  
31 monthly).

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

34 Q. Did Staff inquire as to whether this process could be routinely undertaken to  
35 preserve data for future rate cases?

36 A. Yes. Staff DR 175.1 asked:

1 Please refer to the 11/28/2023 response to DR 175. (a) Please describe  
2 the amount of time it takes, and the personnel involved in running the  
3 query described in Evergy's answer to part a of the response to DR 175.  
4 (b) Could the query described in Evergy's answer to part a of the  
5 response to DR 175 be run every Tuesday morning of each week, and  
6 also on the 1st and last calendar day of each month until Evergy develops  
7 the queries described in part b of Evergy's response to DR 175? (c) If  
8 these queries can be run for nominal cost, please preserve the customer  
9 count data as described in part b of this question for use in future Evergy  
10 rate cases or related matters. Please provide all pertinent answers for both  
11 Evergy Missouri Metro and Evergy Missouri West.

12 Evergy's response is provided below, indicating an apparent unwillingness to exert  
13 minimal effort to preserve customer count data:

- 14 a. Given that the query has been developed and tested, the ongoing  
15 process takes approximately 15 minutes to execute the query and  
16 document the results for the TOU subset of Missouri rates. Personnel  
17 involved in this part of the process has been the Sr. Manager,  
18 Customer Analytics & Automation.
- 19 b. Although possible, it is not Evergy's intention to utilize manual  
20 queries designed for a specific purpose to be executed in this way as  
21 a makeshift solution.
- 22 c. Although possible, it is not Evergy's intention to utilize manual  
23 queries designed for a specific purpose to be executed in this way as  
24 a makeshift solution.

25 Q. Has Evergy's counsel made any representations concerning these issues?

26 A. Yes. In response to concern 2, on October 2, 2023, Mr. Jim Fisher represented  
27 by email that "Evergy is retaining hourly billing information and Evergy can pull it by rate plan  
28 (i.e. rate code)."

29 Regarding item 3, confidential schedule BDL-1 notes that \*\* "[REDACTED]  
30 [REDACTED]." \*\*

31 Access to this information is lost each day that the Company delayed this case. Following a

1 | discovery conference counsel for Evergy, Mr. Roger Steiner, made the following representation  
2 | by email:

3 | \*\* [REDACTED]  
4 | [REDACTED]  
5 | [REDACTED]  
6 | [REDACTED]  
7 | [REDACTED]  
8 | [REDACTED]  
9 | [REDACTED]  
10 | [REDACTED]  
11 | [REDACTED]  
12 | [REDACTED]  
13 | [REDACTED]  
14 | [REDACTED]  
15 | [REDACTED]  
16 | [REDACTED]  
17 | [REDACTED]  
18 | [REDACTED]  
19 | [REDACTED]  
20 | [REDACTED]  
21 | [REDACTED] \*\*

22 | **CONCLUSION**

23 | Q. Does this conclude your rebuttal testimony?

24 | A. Yes it does.

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of Requests for Customer )  
Account Data Production from Evergy )  
Metro, Inc. d/b/a Evergy Missouri Metro and ) Case No. EO-2024-0002  
Evergy Missouri West, Inc. d/b/a Evergy )  
Missouri West )

**AFFIDAVIT OF SARAH L.K. LANGE**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

**COMES NOW SARAH L.K. LANGE** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Sarah L.K. Lange*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Sarah L.K. Lange  
SARAH L.K. LANGE

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 12<sup>th</sup> day of December 2023.

DIANNA L. VAUGHT  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: July 18, 2027  
Commission Number: 15207377

Dianna L. Vaught  
Notary Public

**Sarah L.K. Lange**

I received my J.D. from the University of Missouri, Columbia, in 2007, and am licensed to practice law in the State of Missouri. I received my B.S. in Historic Preservation from Southeast Missouri State University, and took courses in architecture and literature at Drury University. Since beginning my employment with the MoPSC I have taken courses in economics through Columbia College and courses in energy transmission through Bismarck State College, and have attended various trainings and seminars, indicated below.

I began my employment with the Commission in May 2006 as an intern in what was then known as the General Counsel's Office. I was hired as a Legal Counsel in September 2007, and was promoted to Associate Counsel in 2009, and Senior Counsel in 2011. During that time my duties consisted of leading major rate case litigation and settlement, and presenting Staff's position to the Commission, and providing legal advice and assistance primarily in the areas of depreciation, cost of service, class cost of service, rate design, tariff issues, resource planning, accounting authority orders, construction audits, rulemakings and workshops, fuel adjustment clauses, document management and retention, and customer complaints.

In July 2013 I was hired as a Regulatory Economist III in what is now known as the Tariff / Rate Design Department. In this position my duties include providing analysis and recommendations in the areas of RTO and ISO transmission, rate design, class cost of service, tariff compliance and design, and regulatory adjustment mechanisms and tariff design. I also continue to provide legal advice and assistance regarding generating station and environmental control construction audits and electric utility regulatory depreciation. I have also participated before the Commission under the name Sarah L. Kliethermes.

**Presentations**

*Midwest Energy Policy Series – Impact of ToU Rates on Energy Efficiency* (August 14, 2020)

*Billing Determinants Lunch and Learn* (March 27, 2019)

*Support for Low Income and Income Eligible Customers, Cost-Reflective Tariff Training, in cooperation with U.S.A.I.D. and NARUC, Addis Ababa, Ethiopia* (February 23-26, 2016)

*Fundamentals of Ratemaking at the MoPSC* (October 8, 2014)

*Ratemaking Basics* (Sept. 14, 2012)

Participant in Missouri's Comprehensive Statewide Energy Plan working group on Energy Pricing and Rate Setting Processes.

**Relevant Trainings and Seminars**

*Regional Training on Integrated Distribution System Planning for Midwest/MISO Region*  
(October 13-15, 2020)

*“Fundamentals of Utility Law”* Scott Hempling lecture series (January – April, 2019)

*Today's U.S. Electric Power Industry, the Smart Grid, ISO Markets & Wholesale Power Transactions* (July 29-30, 2014)

*MISO Markets & Settlements* training for OMS and ERSC Commissioners & Staff (January 27–28, 2014)

*Validating Settlement Charges in New SPP Integrated Marketplace* (July 22, 2013)

PSC Transmission Training (May 14 – 16, 2013)

Grid School (March 4–7, 2013)

Specialized Technical Training - Electric Transmission (April 18–19, 2012)

*The New Energy Markets: Technologies, Differentials and Dependencies* (June 16, 2011)

Mid-American Regulatory Conference Annual Meeting (June 5–8, 2011)

*Renewable Energy Finance Forum* (Sept. 29–Oct 3, 2010)

*Utility Basics* (Oct. 14–19, 2007)

**Testimony and Staff Memoranda**

<u>Company</u>	<u>Case No.</u>
Evergy Metro, Inc. d/b/a Evergy Missouri Metro Evergy Missouri West, Inc. d/b/a Evergy Missouri West In the Matter of Requests for Customer Account Data Production from Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West	EO-2024-0002
Union Electric Company d/b/a Ameren Missouri In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Certificates of Convenience and Necessity for Solar Facilities	EA-2023-0286
Evergy Metro, Inc. d/b/a Evergy Missouri Metro Evergy Missouri West, Inc. d/b/a Evergy Missouri West In the Matter of the Joint Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Approval of Tariff Revisions to TOU Program	ET-2024-0061
Evergy Metro, Inc. d/b/a Evergy Missouri Metro Evergy Missouri West, Inc. d/b/a Evergy Missouri West In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's Request to Revise Its Solar Subscription Rider	EO-2023-0423 EO-2023-0424
Union Electric Company d/b/a Ameren Missouri In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust its Revenues for Electric Service	ER-2022-0337
NextEra Energy Transmission Southwest, LLC In the Matter of the Application of NextEra Energy Transmission Southwest, LLC for a Certificate of Public Convenience and Necessity to Construct, Install, Own, Operate, Maintain, and Otherwise Control and Manage a 345 kV Transmission Line and associated facilities in Barton and Jasper Counties, Missouri	EA-2022-0234
Spire Missouri, Inc. In the Matter of Spire Missouri Inc.'s d/b/a Spire Request for Authority to Implement a General Rate Increase for Natural Gas Service Provided in the Company's Missouri Service Areas	GR-2022-0179
Evergy Missouri West, Inc. dba Evergy Missouri West In the Matter of Evergy Missouri West, Inc. dba Evergy Missouri West for a Financing Order Authorizing the Financing of Extraordinary Storm Costs Through an Issuance of Securitized Utility Tariff Bonds	EF-2022-0155
Evergy Metro, Inc. dba Evergy Missouri Metro Evergy Missouri West, Inc. dba Evergy Missouri West In the Matter of Evergy Metro, Inc. dba Evergy Missouri Metro's Request for Authority to Implement a General Rate Increase for Electric Service. In the Matter of Evergy Missouri West, Inc. dba Evergy Missouri West's Request for Authority to Implement a General Rate Increase for Electric Service.	ER-2022-0129 ER-2022-0130



<u>Company</u>	<u>Case No.</u>
The Empire District Electric Company d/b/a Liberty In the Matter of the Petition of The Empire District Electric Company d/b/a Liberty to Obtain a Financing Order that Authorizes the Issuance of Securitized Utility Tariff Bonds for Energy Transition Costs Related to the Asbury Plant	EO-2022-0193
The Empire District Electric Company d/b/a Liberty In the Matter of the Petition of The Empire District Electric Company d/b/a Liberty to Obtain a Financing Order that Authorizes the Issuance of Securitized Utility Tariff Bonds for Qualified Extraordinary Costs	EO-2022-0040
Ameren Transmission Company of Illinois In the Matter of the Application of Ameren Transmission Company of Illinois for a Certificate of Convenience and Necessity Under Section 393.170 RSMo Relating to Transmission Investments in Southeast Missouri	EA-2022-0099
The Empire District Electric Company d/b/a Liberty In the Matter of the Request of The Empire District Electric Company d/b/a Liberty for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in its Missouri Service Area	ER-2021-0312
Union Electric Company d/b/a Ameren Missouri In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust its Revenues for Electric Service	ER-2021-0240
Ameren Transmission Company of Illinois In the Matter of the Application of Ameren Transmission Company of Illinois for a Certificate of Public Convenience and Necessity to Construct, Install, Own, Operate, Maintain, and Otherwise Control and Manage a 138 kV Transmission Line and associated facilities in Perry and Cape Girardeau Counties, Missouri	EA-2021-0087
Evergy Affiliates In the Matter of the Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Approval of a Transportation Electrification Portfolio	ET-2021-0151
Spire Missouri, Inc. In the Matter of Spire Missouri Inc.'s d/b/a Spire Request for Authority to Implement a General Rate Increase for Natural Gas Service Provided in the Company's Missouri Service Areas	GR-2021-0108
Union Electric Company d/b/a Ameren Missouri In the Matter of the Request of Union Electric Company d/b/a Ameren for Approval of its Surge Protection Program	ET-2021-0082
Union Electric Company d/b/a Ameren Missouri In the Matter of the Request of Union Electric Company d/b/a Ameren Missouri to Implement the Delivery Charge Adjustment for the 1st Accumulation Period beginning September 1, 2019 and ending August 31, 2020	GT-2021-0055
The Empire District Electric Company In the Matter of The Empire District Electric Company's Tariffs Approval of a Transportation Electrification Portfolio for Electric Customers in its Missouri Service Area	ET-2020-0390

<u>Company</u>	<u>Case No.</u>
The Empire District Electric Company In the Matter of The Empire District Electric Company's Tariffs to Increase Its Revenues for Electric Service	ER-2019-0374
Union Electric Company d/b/a Ameren Missouri In the Matter of of Union Electric Company d/b/a Ameren Missouri's Tariffs to Decrease Its Revenues for Electric Service	ER-2019-0335
KCP&L Greater Missouri Operations Company In the Matter of KCP&L Greater Missouri Operations Company Request for Authority to Implement Rate Adjustments Required by 4 CSR 240-20.090(8) And the Company's Approved Fuel and Purchased Power Cost Recovery Mechanism	ER-2019-0413
Union Electric Company d/b/a Ameren Missouri In the Matter of of Union Electric Company d/b/a Ameren Missouri's Tariffs to Increase Its Revenues for Natural Gas Service	GR-2019-0077
Union Electric Company d/b/a Ameren Missouri In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri Revised Tariff Sheets	ET-2019-0149
The Empire District Electric Company In the Matter of The Empire District Electric Company's Revised Economic Development Rider Tariff Sheets	ET-2019-0029
The Empire District Electric Company In the Matter of a Proceeding Under Section 393.137 (SB 564) to Adjust the Electric Rates of The Empire District Electric Company	ER-2018-0366
Union Electric Company d/b/a Ameren Missouri In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and a Certificate of Public Convenience and Necessity Authorizing it to Construct a Wind Generation Facility	EA-2018-0202
Kansas City Power & Light Company KCP&L Greater Missouri Operations Company In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service	ER-2018-0145 ER-2018-0146
Union Electric Company d/b/a Ameren Missouri In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of Efficient Electrification Program	ET-2018-0132
Union Electric Company d/b/a Ameren Missouri In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of 2017 Green Tariff	ET-2018-0063
Laclede Gas Company Laclede Gas Company d/b/a Missouri Gas Energy In the Matter of Laclede Gas Company's Request to Increase Its Revenue for Gas Service, In the Matter of Laclede Gas Company d/b/a Missouri Gas Energy's Request to Increase Its Revenue for Gas Service.	GR-2017-0215 GR-2017-0216
Kansas City Power & Light Company In the Matter of Kansas City Power & Light Company's Demand Side Investment Rider Rate Adjustment And True-Up Required by 4 CSR 240-3.163(8)	ER-2017-0316

<u>Company</u>	<u>Case No.</u>
Kansas City Power & Light Company In the Matter of Kansas City Power & Light Company's Demand Side Investment Rider Rate Adjustment And True-Up Required by 4 CSR 240-3.163(8)	ER-2017-0167
KCP&L Great Missouri Operations Company In the Matter of KCP&L Greater Missouri Operations Company's Annual RESRAM Tariff Filing	ET-2017-0097
Grain Belt Express Clean Line, LLC In the Matter of the Application of Grain Belt Express Clean Line LLC for a Certificate of Convenience and Necessity Authorizing It to Construct, Own, Operate, Control, Manage, and Maintain a High Voltage, Direct Current Transmission Line and an Associated Converter Station Providing an Interconnection on the Maywood - Montgomery 345 kV Transmission Line	EA-2016-0358
Kansas City Power & Light Company In the Matter of Kansas City Power & Light Company's Demand Side Investment Rider Rate Adjustment And True-Up Required by 4 CSR 240-3.163(8)	ER-2016-0325
Kansas City Power & Light Company In the Matter of Kansas City Power & Light Company's Request for Authority to Implement A General Rate Increase for Electric Service	ER-2016-0285
Union Electric Company d/b/a Ameren Missouri In the Matter of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and a Certificate of Public Convenience and Necessity Authorizing it to Offer a Pilot Subscriber Solar Program and File Associated Tariff	EA-2016-0207
Union Electric Company d/b/a Ameren Missouri In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariff to Increase Its Revenues for Electric Service	ER-2016-0179
KCP&L Great Missouri Operations Company In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement a General Rate Increase for Electric Service	ER-2016-0156
Empire District Electric Company In the Matter of The Empire District Electric Company's Request for Authority to Implement a General Rate Increase for Electric Service	ER-2016-0023
Ameren Transmission Company of Illinois In the Matter of the Application of Ameren Transmission Company of Illinois for Other Relief or, in the Alternative, a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Maintain and Otherwise Control and Manage a 345,000-volt Electric Transmission Line from Palmyra, Missouri to the Iowa Border and an Associated Substation Near Kirksville, Missouri	EA-2015-0146
Ameren Transmission Company of Illinois In the Matter of the Application of Ameren Transmission Company of Illinois for Other Relief or, in the Alternative, a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Maintain and Otherwise Control and Manage a 345,000-volt Electric Transmission Line in Marion County, Missouri and an Associated Switching Station Near Palmyra, Missouri	EA-2015-0145

<u>Company</u>	<u>Case No.</u>
Union Electric Company d/b/a Ameren Missouri In the Matter of Union Electric Company d/b/a Ameren Missouri's 2nd Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA	EO-2015-0055
Kansas City Power & Light Company In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service	ER-2014-0370
Empire District Electric Company In the Matter of The Empire District Electric Company for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Company's Missouri Service Area	ER-2014-0351
Union Electric Company d/b/a Ameren Missouri City of O'Fallon, Missouri, and City of Ballwin, Missouri, Complainants v. Union Electric Company d/b/a Ameren Missouri, Respondent	EC-2014-0316
Union Electric Company d/b/a Ameren Missouri In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariff to Increase Its Revenues for Electric Service	ER-2014-0258
Union Electric Company d/b/a Ameren Missouri Noranda Aluminum, Inc., et al., Complainants, v. Union Electric Company d/b/a Ameren Missouri, Respondent	EC-2014-0224
Grain Belt Express Clean Line, LLC In the Matter of the Application of Grain Belt Express Clean Line LLC for a Certificate of Convenience and Necessity Authorizing It to Construct, Own, Operate, Control, Manage, and Maintain a High Voltage, Direct Current Transmission Line and an Associated Converter Station Providing an Interconnection on the Maywood - Montgomery 345 kV Transmission Line	EA-2014-0207
KCP&L Great Missouri Operations Company In the Matter of KCP&L Greater Missouri Operations Company's Application for Authority to Establish a Renewable Energy Standard Rate Adjustment Mechanism	EO-2014-0151
Kansas City Power & Light Company In the Matter of Kansas City Power & Light Company's Filing for Approval of Demand-Side Programs and for Authority to Establish A Demand-Side Programs Investment Mechanism	EO-2014-0095
Veolia Energy Kansas City, Inc. In the Matter of Veolia Energy Kansas City, Inc. for Authority to File Tariffs to Increase Rates	HR-2014-0066



**Legal Department**

**Roger W. Steiner**  
Corporate Counsel  
Telephone: (816) 556-2314  
Facsimile: (816) 556-2110  
[Roger.Steiner@evergy.com](mailto:Roger.Steiner@evergy.com)

November 9, 2023

**VIA EMAIL:** [carolyn.kerr@psc.mo.gov](mailto:carolyn.kerr@psc.mo.gov)

Carolyn Kerr  
Missouri Public Service Commission  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102

**RE: File No. EO-2024-0002; Staff (“Staff”) for the Missouri Public Service Commission (“Commission”) Data Requests**

Dear Carolyn:

This letter is in response to Data Requests nos. 7 thru 147 which Evergy Missouri Metro and Evergy Missouri West ( the “Company”) received from Staff on November 6, 2023 (“Data Requests”).

This letter should be considered an objection on behalf of the Company to the Data Requests described above in accordance with Commission Rule 20 CSR 4240-2.090(2), for the reasons described below.

The Company objects to the Data Requests to the extent they seek documents or information protected by the attorney client privilege, the attorney work product doctrine, or any other applicable privileges or doctrines. Any inadvertent disclosure of such privileged documents or information shall not be deemed to be a waiver by the Company of the attorney-client privilege, work product doctrine, or other applicable privileges or doctrines.

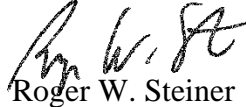
Additionally, the Company objects to the Data Requests as vague, overly broad, unduly burdensome, calling for speculation and not reasonably calculated to lead to the discovery of admissible evidence and not relevant or material to the subject matter of this proceeding. To the extent that a Data Request asks for estimates, analysis, or calculations that have not been performed by the Company, the Company will not provide a response to such Data Request.

Some of the Data Requests appear to request the very information that the Commission will determine whether the Company must provide to Staff. Until this docket is resolved by the Commission, the Company will not be providing a response to such Data Requests.

Also, due to the large volume of Data Requests submitted by Staff, the Company may not be able to provide a response to all of the Data Requests within ten days. Those requesting counts from the Company property records and inventory systems are expected to be a challenge within the reduced response timing. The Company seeks a minimum 5-day extension to the response due date(s).

The Company will provide responses to these Data Request subject to the objections asserted above.

Sincerely,



Roger W. Steiner



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 16, 2023

Question:0031

Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected Poles at each of the three most common heights, and 20 random poles at each of the next three most common heights and determine the voltages at which each pole supports operations. 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:**

The Company has not performed the analysis to offer such an estimate. As this scenario is reliant on manual work, interacting with various systems, the Company cannot offer a reliable estimate of the hours required.

**Information provided by:** Brad Lutz

**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





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 16, 2023

Question:0035

Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected segments of underground conduit, and determine the voltages at which it supports operations. 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:**

The Company has not performed the analysis to offer such an estimate. As this scenario is reliant on manual work, interacting with various systems, the Company cannot offer a reliable estimate of the hours required.

**Information provided by:** Brad Lutz

**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



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 16, 2023

Question:0039

Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected segments of overhead conductor operating at each of the most common voltages served, and determine which retirement units or plant characteristics are utilized. 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:**

The Company has not performed the analysis to offer such an estimate. As this scenario is reliant on manual work, interacting with various systems, the Company cannot offer a reliable estimate of the hours required.

**Information provided by:** Brad Lutz

**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



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 16, 2023

Question:0040

Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to determine how many miles of overhead conductor operate at each of the most common voltages served, and determine which retirement units or plant characteristics are utilized.

**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:**

The Company has not performed the analysis to offer such an estimate. As this scenario is reliant on manual work, interacting with various systems, the Company cannot offer a reliable estimate of the hours required.

**Information provided by:** Brad Lutz

**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



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 16, 2023

Question:0044

Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected segments of underground conductor operating at each of the most common voltages served, and determine which retirement units or plant characteristics are utilized. 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:**

The Company has not performed the analysis to offer such an estimate. As this scenario is reliant on manual work, interacting with various systems, the Company cannot offer a reliable estimate of the hours required.

**Information provided by:** Brad Lutz

**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





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 16, 2023

Question:0045

Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to determine how many miles of underground conductor operate at each of the most common voltages served, and determine which retirement units or plant characteristics are utilized. 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:**

The Company has not performed the analysis to offer such an estimate. As this scenario is reliant on manual work, interacting with various systems, the Company cannot offer a reliable estimate of the hours required.

**Information provided by:** Brad Lutz

**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



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 16, 2023

Question:0066

(a) Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected commercial customers to determining the retirement unit of the meter. (b) Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected industrial customers to determining the retirement unit of the meter. (c) Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected residential customers to determining the retirement unit of the meter. 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:**

- a. As this scenario is reliant on manual work, interacting with various systems, the Company cannot offer a reliable estimate of the hours required.
- b. As this scenario is reliant on manual work, interacting with various systems, the Company cannot offer a reliable estimate of the hours required.
- c. As this scenario is reliant on manual work, interacting with various systems, the Company cannot offer a reliable estimate of the hours required.

**Information provided by:** Brad Lutz

**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



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 16, 2023

Question:0100

(a) In Evergy MISSOURI WEST's opinion, what data is necessary to identify Poles costs by voltage? (b) In Evergy MISSOURI WEST's opinion, what data is necessary to identify Poles operations expenses by voltage? (c) In Evergy MISSOURI WEST's opinion, what data is necessary to identify Poles maintenance expenses by voltage? (d) In Evergy MISSOURI WEST's opinion, which systems contain the data that is necessary to identify Poles costs, operations expenses, and maintenance expenses by voltage? Sarah Lange (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:**

a. Costs can be identified through Company accounting records. The Company does not have a clear approach to associate these costs to voltage. Data or logic required to associate the expenses to a voltage are not part of the Company systems.

b. Expenses can be identified through Company accounting records. The Company does not have a clear approach to associate these costs to voltage. Data or logic required to associate the expenses to a voltage are not part of the Company systems.

c. Expenses can be identified through Company accounting records. The Company does not have a clear approach to associate these costs to voltage. Data or logic required to associate the expenses to a voltage are not part of the Company systems.

d. Elements of the data needed may be contained in the company Work Management System, Mapping System, Property Records System and Billing System. The Company is unaware of a data key to associate the data and produce the requested output.

**Information provided by:** Brad Lutz



**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



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 16, 2023

Question:0106

Please identify the number of working hours Evergy MISSOURI WEST anticipates would be required to survey 100 randomly selected segments of underground conduit, and determine the voltages at which it supports operations. 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:**

The Company has not performed the analysis to offer such an estimate. As this scenario is reliant on manual work, interacting with various systems, the Company cannot offer a reliable estimate of the hours required.

**Information provided by:** Brad Lutz

**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





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 16, 2023

Question:0110

Please identify the number of working hours Evergy MISSOURI WEST anticipates would be required to survey 100 randomly selected segments of overhead conductor operating at each of the most common voltages served, and determine which retirement units or plant characteristics are utilized. Sarah Lange (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:**

The Company has not performed the analysis to offer such an estimate. As this scenario is reliant on manual work, interacting with various systems, the Company cannot offer a reliable estimate of the hours required.

**Information provided by:** Brad Lutz

**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



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 16, 2023

Question:0111

Please identify the number of working hours Evergy MISSOURI WEST anticipates would be required to determine how many miles of overhead conductor operate at each of the most common voltages served, and determine which retirement units or plant characteristics are utilized. Sarah Lange (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:**

The Company has not performed the analysis to offer such an estimate. As this scenario is reliant on manual work, interacting with various systems, the Company cannot offer a reliable estimate of the hours required.

**Information provided by:** Brad Lutz

**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



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 16, 2023

Question:0115

Please identify the number of working hours Evergy MISSOURI WEST anticipates would be required to survey 100 randomly selected segments of underground conductor operating at each of the most common voltages served, and determine which retirement units or plant characteristics are utilized. 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:**

The Company has not performed the analysis to offer such an estimate. As this scenario is reliant on manual work, interacting with various systems, the Company cannot offer a reliable estimate of the hours required.

**Information provided by:** Brad Lutz

**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



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 16, 2023

Question:0116

Please identify the number of working hours Evergy MISSOURI WEST anticipates would be required to determine how many miles of underground conductor operate at each of the most common voltages served, and determine which retirement units or plant characteristics are utilized. 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:**

The Company has not performed the analysis to offer such an estimate. As this scenario is reliant on manual work, interacting with various systems, the Company cannot offer a reliable estimate of the hours required.

**Information provided by:** Brad Lutz

**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





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 16, 2023

Question:0120

Please identify the number of working hours Evergy MISSOURI WEST anticipates would be required to survey 100 randomly selected Overhead devices, and determine the voltages at which it supports operations. 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:**

The Company has not performed the analysis to offer such an estimate. As this scenario is reliant on manual work, interacting with various systems, the Company cannot offer a reliable estimate of the hours required.

**Information provided by:** Brad Lutz

**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



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 16, 2023

Question:0124

Please identify the number of working hours Evergy MISSOURI WEST anticipates would be required to survey 100 randomly selected Underground devices, and determine the voltages at which it supports operations. 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:**

The Company has not performed the analysis to offer such an estimate. As this scenario is reliant on manual work, interacting with various systems, the Company cannot offer a reliable estimate of the hours required.

**Information provided by:** Brad Lutz

**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



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 16, 2023

Question:0137

(a) Please identify the number of working hours Evergy MISSOURI WEST anticipates would be required to survey 100 randomly selected commercial customers to determining the retirement unit of the meter. (b) Please identify the number of working hours Evergy MISSOURI WEST anticipates would be required to survey 100 randomly selected industrial customers to determining the retirement unit of the meter. (c) Please identify the number of working hours Evergy MISSOURI WEST anticipates would be required to survey 100 randomly selected residential customers to determining the retirement unit of the meter. 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:**

a. The Company has not performed the analysis requested. As this scenario is reliant on manual work, interacting with various systems, the Company cannot offer a reliable estimate of the hours required.

b. The Company has not performed the analysis requested As this scenario is reliant on manual work, interacting with various systems, the Company cannot offer a reliable estimate of the hours required.

c. The Company has not performed the analysis requested As this scenario is reliant on manual work, interacting with various systems, the Company cannot offer a reliable estimate of the hours required.

**Information provided by:** Brad Lutz

**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