

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

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

**STAFF RESPONSE TO DECEMBER 18, 2023 PRESENTATION
AND REQUESTS FOR ADDITIONAL INFORMATION**

COMES NOW the Staff of the Missouri Public Service Commission, and for its *Staff Response to December 18, 2023 Presentation and Requests for Additional Information*, states as follows:

1. Given the Commission’s interest in this matter, Staff is filing its feedback in this working docket, and requests that Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (collectively, “Evergy” or the “Company”) provide its responses to the information requests included here-in in this working docket to the extent practicable.

Staff’s Requests for Additional Information

2. Staff’s understanding of the information Evergy presented at the December 18 workshop is when a customer attempts to switch a plan electronically the customer is informed that a plan switch takes effect on next business day. Please confirm this understanding of the current practices.

3. Staff’s understanding of the information Evergy presented at the December 18 workshop is that Evergy is attempting to update its online tool so that when a customer attempts to switch a plan electronically the customer will be informed that the plan switch will take effect on first day of next billing cycle.

- a. Please confirm this understanding of the proposed practices.
 - b. Please provide an estimate of the cost of changing the webpage wording to state “the first day of the next billing cycle” or comparable wording that does not contain the actual date applicable to that particular customer.
 - c. Please provide an estimate of the cost of changing the webpage to display the actual date of the particular customer’s next billing cycle.
 - d. Please provide an estimate of the cost of changing the billing system to accommodate a delay in the plan change date to the first day of the next billing cycle.
4. Provide the copy for (a) both sets of rate plan descriptions; (b) terms and conditions; and (c) copy of all webpages as screenprint, including the content of expandable and explodable buttons.
5. Evergy walked stakeholders through a “Rate Simulator” at the December 18 workshop. (a) In regards to the cost of the module, did Evergy explore alternatives without this “Rate Simulator” feature, (b) How are the bill estimates calculated? Please include how bill estimates are calculated for the variations for each answer available in the Rate Simulator survey; (c) What is “simulated,” for purposes of this tool, specifically, are specific end uses considered that are relevant to that customer, such as use of a pool pump or the customer’s HVAC type and age, or home size and age?
6. Please provide examples of weekly rate coach report for customers on each rate plan, and provide examples of content variations as they occur (i.e. seasonal changes to messaging).

7. In the rate coach and related materials, how does display of summer/nonsummer peak/nonpeak usage displays align with actual billing practices (i.e. billing cycle versus calendar month)?

8. Please provide copies of the various Opower reports about “best plans.”

9. According to Staff’s understanding on the information Evergy presented at December 18 workshop, Evergy is keeping ongoing tracking of rate switching. Please provide monthly reports with this information.

10. In regards to the Rate comparison tool,

a. Provide a list of all riders included in the analysis and explain how the rate used for each is determined. For example, is one FAC rate used for the year, or are the FAC rates in effect in a given month used?

b. Provide screenshots of the customer-facing explanation of the information included in part a.

Staff Feedback

1. Copy which Evergy presented stating, “You’re already on the lowest cost rate plan,” is misleading to customers. At a minimum, this sentence should be expanded to state, “Based on your most recent 12 months of usage, you’re on the lowest cost rate plan.” Ideally, language should be included referencing the relative risk of rate plans, and changes in usage due to weather and appliance use.

2. The “Who’s it for” language observed during the presentation in the description of each rate plan appeared to be misleading. Staff is available for further discussion when the screenshots of this language in its current form is provided.

3. Staff is concerned that the rate plan comparison tool does not provide information related to the logged-in customer's usage by rate period. Staff is of the understanding that information of this sort is provided in the emailed rate coach email, but only as it pertains to the plan the customer is on. Direct access to the "rate coach" email from the customer portal would be an improvement. Presentation of the "rate coach" email information within the customer portal for each rate plan would be preferable, if the cost of providing this information is not excessive.
4. On the monthly bill comparison, the inclusion of the date with the month name is confusing, and should be omitted or explained if possible.
5. Staff recommends Evergy develop copy for its website to include with rate comparison tools discussing for effects of major weather events or atypical events to be displayed for future events comparable to Storm Uri, the Polar Vortex, or major outages. Evergy should also consider methods to omit months with this sort of major disruption from rate comparison tools.

WHEREFORE, Staff prays the Commission accept this *Staff Response to December 18, 2023 Presentation and Requests for Additional Information*, and grant such other and further relief as it deems just under the circumstances.

Respectfully submitted,

/s/ Nicole Mers

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 10th day of January 2024.

/s/ Nicole Mers