BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

The Staff of the Missouri Public Service)	
Commission,)	
Complainant,)	
vs.)	Case No. EC-2024-0092
Evergy Metro, Inc. d/b/a Evergy Missouri)	
Metro and Evergy Missouri West, Inc. d/b/a)	
Evergy Missouri West,)	
Respondents.)	

EVERGY MISSOURI METRO'S AND EVERGY MISSOURI WEST'S MOTION FOR SUMMARY DISPOSITION AND/OR DETERMINATION ON THE PLEADINGS, AND MEMORANDUM IN SUPPORT

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("EMM") and Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("EMW") (collectively, "Evergy" or the "Company" or "Respondent") and for their *Motion for Summary Disposition and/or Determination on the Pleadings and Memorandum in Support* ("Motion"), state as follows:

BACKGROUND

- 1. On December 8, 2022, the Missouri Public Service Commission ("Commission") issued its *Amended Report and Order* ("Order") in File Nos. ER-2022-0129 and ER-2022-0130, with an effective date of December 18, 2022.
- 2. The Commission issued its *Order Approving Four Partial Stipulations and Agreements* in File Nos. ER-2022-0129 and ER-2022-0130 ("*Stipulation Order*"), on September 22, 2022. In the various stipulations ("Rate Case Stipulation"), Evergy agreed, among other things, to file pleadings to open various dockets, hold informal meetings with parties, and file tariffs to address specific services.

- 3. On September 15, 2023, Staff filed its Complaint which alleges that Evergy has failed to comply with certain aspects of the stipulations and agreements approved in File Nos. ER-2022-0129 and ER-2022-0130.
 - 4. On October 18, 2023, Evergy filed its Answer to Staff Complaint.
- 5. On November 16, 2023, the Commission convened a procedural conference at which time the Staff announced that it intended to file an amended complaint.
- 6. On November 20, 2023, Staff filed its Amended Complaint which re-alleges that Evergy has failed to comply with certain aspects of the stipulations and agreements approved in File Nos. ER-2022-0129 and ER-2022-0130.
- 7. On December 4, 2023, the Commission issued its *Notice of Amended Complaint* and *Order Directing Answer* ("December 4 Order") that directed the Company to file its answer no later than January 3, 2024.
- 8. The Staff's Amended Complaint make allegations related to Evergy's alleged failures to comply with certain aspects of the stipulations and agreements in File Nos. ER-2022-0129 and ER-2022-0130. Counts 1-6 have had existing dockets and/or discussions with Staff and other parties that have addressed the underlying substantive issues related to these allegations, and these counts are being addressed by the Commission in those dockets.
 - 9. On January 3, 2024, Evergy filed its Answer to Amended Complaint.
 - 10. The following proceedings are directly related to each of these respective counts:

Count 1 — <u>Re Requests from Evergy Missouri Metro, Inc. d/b/a Evergy</u>

<u>Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for</u>

<u>Customer Data Account Data Production</u>, File No. EO-2024-0002. Evidentiary

2

¹ The Commission issued its Order Setting Procedural Schedule, File No. EO-2024-0002 on October 18, 2023, which directed the filing of testimony by the parties and evidentiary hearings in January, 2024.

hearings were held on January 30 and 31, 2024, and briefs were filed on March 22 and April 9, 2024. The case is now fully submitted and waiting for a decision by the Commission.

Count 2 — <u>Rate Modernization Discussions</u>—discussions among Evergy,
Staff and other parties were held on August 4 and August 28, 2023.² The direct
testimony of Bradley D. Lutz also addresses Rate Modernization issues in Evergy
Missouri West's pending rate case, File No. ER-2024-0189.³

Count 3 — Re Evergy Metro, Inc. d/b/a Evergy Missouri Metro's Request to Revise Its Solar Subscription Rider, File No. EO-2023-0423 and Re Evergy Missouri West d/b/a Evergy Missouri West's Request To Revise Its Solar Subscription Rider, File No. EO-2023-0424 (filed on June 14, 2023). On December 1, 2023, Evergy filed its revised solar subscription tariff in In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Solar Subscription Rider Tariff, File Nos. ET-2024-0182. Evidentiary hearings in File No. ET-2024-0182 were held on April 3, 2024, and briefs were filed on April 19, 2024. As a result, File No. ET-2024-0182 is fully submitted..

Counts 4, 5, and 6 — <u>Re Collaborative Workshop for Customer Education</u> and Outreach Regarding the Introduction of Default Time-of-Use Rates by Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a

² See Tr. 275-76, 284-87, 291, 321-23, and 373 in File No. EO-2024-0002.

³ Direct Testimony of Bradley D. Lutz, pp. 14-34, File No. ER-2024-0189.

⁴ On December 1, 2023, the Company filed tariffs in File No. ET-2024-0182. On December 7, 2023, the Commission closed File Nos. EO-2023-0423 and EO-2023-024 at the request of the Company and Staff since any issues with the Solar Subscription Rider may be handled File No. ET-2024-0182 and this proceeding.

<u>Evergy Missouri West</u>, File No. EW-2023-0199. ⁵ The final, scheduled on-the-record proceeding was held in this matter on April 2, 2024. Quarterly reports will be filed related to this matter in the future. Evergy's Missouri residential customers are now on a default TOU rate or one of the other TOU rate plans.

I. STANDARD OF REVIEW

- 11. Under 20 CSR 4240-2.117(1)(E), the standard for approval of the Companies' Motion For Summary Disposition requires a showing that (1) there is no genuine issue as to any material fact, (2) that the moving party is entitled to relief as a matter of law as to all or any part of the case, and (3) the Commission determines granting summary relief is in the public interest. As will be shown herein, the Companies' Motion for Summary Disposition meets each of these elements and, consequently, the Commission should grant summary disposition in favor of the Company and dismiss the Complaint against the Company with prejudice.
- 12. The standard for granting a Motion For A Determination on the Pleadings is found in 20 CSR 4240-2.117(2) which states that the Commission may dispose of all or any part of a case on the pleadings "whenever such disposition is not otherwise contrary to law or contrary to the public interest."
- 13. The public interest clearly favors the quick and efficient resolution of this matter by summary disposition without an evidentiary hearing. Since there is no genuine issue as to any material fact related to Counts 1-6 of the Complaint, the time and cost to hold a hearing would be contrary to the public interest. In addition, since the Commission has already heard the issues

4

⁵ The Commission opened this docket on December 19, 2022. Subsequently, there have been 2 workshops, an Agenda presentation on August 10, 2023, and on-the-record presentation on November 28, 2023, January 22, 2024, and April 2, 2024 regarding the progress of Evergy TOU Implementation Plan. This docket includes numerous pleadings addressing concerns and questions raised by Staff and Public Counsel. In addition, the docket includes the filing numerous quarterly and weekly operational metric reports.

raised in Counts 1-4 in other cases, as discussed below, Counts 1-4 should be dismissed since the issues raised in this Complaint proceeding have already been addressed or are currently before the Commission for resolution in other cases. Since the issues raised in Counts 5 and 6 have also been thoroughly explored and discussed by the Commission in File No. EW-2023-0199, it would "not be contrary to the public interest" to dismiss Counts 5 and 6, and would instead serve the public interest since it will promote administrative efficiency by eliminating the redundant consideration of issues that have been reviewed by the Commission.

II. MOTION FOR DETERMINATION ON THE PLEADINGS

- 14. As discussed above, Counts 1, 2, 3, 4, 5 and 6 should be dismissed on the following grounds:
 - a. Any issues raised in the Amended Complaint related to Counts 1, 2, 3, 4, 5 and 6 of the Amended Complaint are already being considered in the pending dockets discussed above and it would be waste of the Commission's resources to hear those issues again in this Complaint proceeding.
 - b. Counts 1, 2, 3 and 4 of the Amended Complaint should be dismissed as moot since Evergy has filed the cases and held informal discussions related to those counts, as it agreed to do.
 - c. Counts 1, 2, 3, 4, 5 and 6 of the Amended Complaint should be dismissed since EMM and EMW have performed their obligations under the Stipulation.
 - d. Counts 5 and 6 of the Amended Complaint should be dismissed since the
 Commission has been kept apprised on the progress and results of Evergy's

TOU implementation plan, and additional hearings on the Complaint would be redundant and unnecessary.

III. NO GENUINE DISPUTE AS TO MATERIAL FACTS

15. As discussed below, (1) there are no genuine disputes as to material facts related to Counts 1-6, (2) Evergy is entitled to relief as a matter of law as to all or any part of the case, and (3) granting summary relief is in the public interest. For these reasons, Counts 1-6, inclusive, should be dismissed.

COUNT 1

- 16. Count 1 alleges that "Evergy did not file testimony as it agreed to do in the Stipulation approved by the Commission in its Order Approving Four Partial Stipulations and Agreements in Case Nos. ER-2022-0129 and ER-2022-0130 ("Stipulation Order"), effective October 2, 2022, nor has Evergy estimated the cost to provide the data it committed to provide, nor identified the processes that it would require to provide the data to estimate the cost of carrying out that process."
- 17. Count 1 should be dismissed since File No. EO-2024-0002 has been fully briefed and submitted to the Commission. Count 1 of the Amended Complaint is seeking the identical information and data that is being requested by Staff in File No. EO-2024-0002.⁷ It is a waste of the Commission's and the parties' resources to re-litigate this request for information again in the Complaint proceeding.
- 18. Second, Count 1 of the Complaint should be dismissed since it is moot. Evergy has already filed the EO- docket as it promised to do with testimony that explained the reasons it could not produce the data or the fact that it would be cost-prohibitive to create and produce the data.

.

⁶ Amended Complaint, ¶ 13.

⁷ See Tr. 431-32, and 318-19 in File No. EO-2024-0002.

19. Third, Evergy has already performed its obligations required by the Rate Case Stipulation, and Count 1 should therefore be dismissed.

A. Material Undisputed Facts Regarding Count 1

- 1) The Companies are electrical corporations and public utilities within the meaning of §386.020 RSMo and engaged in the business of the manufacture, transmission and distribution of electricity subject to the regulatory jurisdiction of the Commission as provided by law.⁸
- 2) The Commission issued its *Amended Report and Order* in cases ER-2022-0129 and ER-2022-0130 on December 8, 2022, effective December 18, 2022.⁹
- 3) The Commission in its *Order Approving Four Partial Stipulations and Agreements* in Case Nos. ER-2022-0129 and ER-2022-0130 ("Stipulation Order"), effective October 2, 2022, approved the Stipulation and Agreement dated August 30, 2022; which included a provision at page 12 in which Evergy committed as follows:

Data Retention: a) Prior to July 1, 2023, the Company will identify and provide the data requested in the direct testimony of Sarah Lange. If the requested data is not available or cost-prohibitive to produce, the Company will file a motion to establish an EO docket. In that docket the Company will provide the reason why it cannot provide the requested data and its individual estimate of the cost to provide each set of requested data, for the further consideration of the parties and the Commission. ¹⁰

4) On June 30, 2023, Evergy filed its Motion to Establish Docket for Further Consideration of Data Production in File Nos ER-2022-0129 and ER-2022-0130, which was also docketed by the Commission as Case No. EO-2024-0002. 11

⁸ EC-2024-0092 Amended Complaint ¶ 3 and 4, Answer ¶ 13 and 14.

⁹ EC-2024-0092 Amended Complaint ¶ 11, Answer ¶ 19.

¹⁰ EC-2024-0092 Amended Complaint ¶ 14, Answer ¶ 22.

¹¹ See Motion To Establish Docket For Further Consideration Data Production, File Nos. ER-2022-0129 and ER-2022-0130 (Attachment No. 1).

5) On November 1, 2023, Evergy filed the Direct Testimony of Bradley D. Lutz and Julie Dragoo which provided the reason Evergy cannot provide the requested data and its individual estimate of the cost to provide each set of requested data, for the further consideration of the parties and the Commission. ¹²

B. Motion For Summary Disposition of Count 1

20. Based upon these undisputed facts, the Commission should grant Evergy's Motion For Summary Disposition of Count 1 and find Evergy has complied with the terms of the Stipulation and Agreement approved in by the Commission in the Company's last rate case (File Nos. ER-2022-0129/0130). The Commission should dismiss Count 1.

COUNT 2

- 21. Count 2 alleges that "Evergy did not meet with stakeholders to discuss rate modernization within 180 days of its tariff effective date as ordered by the Commission in the *Amended Report and Order* issued in Case Nos. ER-2022-0129 and ER-2022-0130." ¹³
- As the record in File No. EO-2024-0002 has demonstrated, Evergy has met with stakeholders to discuss rate modernization within 212 days of its tariff effective date. ¹⁴ Evergy has also filed testimony discussing Rate Modernization issues as a part of Evergy Missouri West's pending rate case, File No. ER-2024-0189.
- 23. Count 2 should be dismissed since Evergy has substantially complied with its agreement to hold discussions on Rate Modernization issues, and it would be a waste of the Commission's and the parties' resources to address this topic in the Amended Complaint.

¹² Direct Testimony of Bradley D. Lutz and Julie Dragoo, File No. EO-2024-0002 (Attachment Nos. 2 and 3).

¹³ Amended Complaint, ¶ 23.

¹⁴ See Tr. 275-76, 284-87, 291, 321-23, and 373 in File No. EO-2024-0002. (During the hearings, counsel for Evergy incorrectly suggested the first meeting was 190 days after the effective date of tariffs.).

A. Material Undisputed Facts Regarding Count 2

- 1) On August 9, 2023, Evergy met with Staff and other interested stakeholders to discuss rate modernization as ordered by the Commission in the *Amended Report and Order* issued in Case Nos. ER-2022-0129 and ER-2022-0130.¹⁵
- 2) On August 28, 2023, Evergy met with Staff and other interested stakeholders to discuss rate modernization (from the perspective of the Staff) as ordered by the Commission in the *Amended Report and Order* issued in Case Nos. ER-2022-0129 and ER-2022-0130.¹⁶
- 3) While the discussions between Evergy and Staff did not occur within 180 days of the effective date of the tariffs approved in Case Nos. ER-2022-0129 and ER-2022-0130, the delay did not impact the substance of the discussions between Evergy, Staff and other stakeholders.¹⁷

B. Motion For Summary Disposition of Count 2

24. Based upon these undisputed facts, the Commission should grant Evergy's Motion For Summary Disposition of Count 2 and find Evergy has substantially complied with the terms of the Stipulation and Agreement approved in by the Commission in the Company's last rate case (File Nos. ER-2022-0129/0130). The Commission should dismiss Count 2.

¹⁵ See Tr. 286, 289, File No. EO-2024-0002 and Evergy Rate Modernization Plan (dated August 9, 2023)(Attachment No. 4).

¹⁶ See Tr. 286, 289, and Ex. 7, Rate Modernization PowerPoint, File No. EO-2024-0002,

¹⁷ See Tr. 323, File No. EO-2024-0002.

COUNT 3

- 25. Count 3 alleges that "Evergy has not filed its solar subscription ET case as it committed to do in Case Nos. ER-2022-0129 and ER-2022-0130 and as reflected in related case filings EO-2023-0423 and EO-2023-0424." ¹⁸
- 26. Count 3 should be dismissed since Evergy filed its solar subscription ET case on December 1, 2023 in File No. ET-2024-0189. Evidentiary hearings were held on April 3, 2024. Briefs were filed on April 19, 2024, and the case is fully submitted and ready for resolution by the Commission. It would be a waste of the Commission's and the parties' resources to re-litigate any issues related to the Solar Subscription Rider program in this complaint proceeding.
- 27. Count 3 should be dismissed since Evergy was under no legal obligation to file an ET- case dealing with solar subscription issues as a result of the *Amended Report and Order* in File Nos. ER-2022-0129 and ER-2022-0130. In fact, the *Amended Report and Order* does not even address the topic of Solar Subscription. Therefore, the Amended Complaint fails to state a claim upon which relief may be granted.
- 28. Third, Count 3 should be dismissed since Evergy has filed its solar subscription ET case on December 1, 2023, and Count 3 is therefore moot.

A. Material Undisputed Facts Regarding Count 3

1) On December 1, 2023, Evergy filed revised tariffs in File No. ET-2024-0189 and Motion To Open New Docket. 19 The filing was intended to revised Evergy's Solar Subscription Rider program.

¹⁸ Amended Complaint, ¶ 33.

¹⁹ Notice of Tariff Revisions And Motion To Open New Docket, File No. ET-2024-0189, Tracking Nos. JE-2024-0084 & JE-2024-0082.

B. Motion For Summary Disposition of Count 3

29. Based upon these undisputed facts, the Commission should grant Evergy's Motion For Summary Disposition of Count 3 and find Evergy has filed a solar subscription rider ET case as it informally committed to Staff in Case Nos. ER-2022-0129 and ER-2022-0130. The Commission should dismiss Count 3.

COUNT 4

- 30. Count 4 alleges that "Evergy did not file its proposed plan for default TOU rates as ordered by the Commission in its prior rate cases, Case Nos. ER-2018-0145 and ER-2018-0146."²⁰
- 31. With regard to Count 4, this Staff allegation is related to the alleged failure of Evergy to file a mandatory, or default TOU, rate option in File Nos. ER-2022-0129 and ER-2022-0130. Staff's underlying premise that Evergy was obligated to file a mandatory TOU rate plan in the last general rate case is clearly incorrect. Evergy was not required to file a mandatory, default TOU rate, as asserted by Staff.
- 32. Staff has already raised this issue in File Nos. ER-2022-0129 and ER-2022-0130,²¹ and Staff should not be permitted to re-litigate its allegation in this complaint proceeding. In fact, the Commission has adopted a TOU default rate as a result of its various orders in those dockets and Evergy has completed its transition to TOU rates for all residential customers.
- 33. Staff's allegations in Counts 4 should be dismissed on the ground that this issue has already been litigated before the Commission.

²⁰ Amended Complaint, ¶ 42.

²¹ See Ex. 216, Lange Direct, pp. 14-16; Staff Post-Hearing Brief, pp. 35-36 in File Nos. ER-2022-0129 and ER-20220130.

A. Material Undisputed Facts Regarding Count 4

1) On September 25, 2018, Evergy, Staff and other interested parties filed a Stipulation And Agreement in Case Nos. ER-2018-0145 and ER-2018-0146 which, among other things, stated:

KCP&L and GMO will submit a Residential TOU rate design in their next rate cases based on lessons learned from the TOU service.²²

- 2) On January 7, 2022, Evergy filed its next general rate case, File Nos. ER-2022-0129 and ER-2022-130 which included Evergy's plan for TOU rates as ordered by the Commission in Case Nos. ER-2018-0145 and ER-2018-0146. ²³
- 3) On December 8, 2023, the Commission issued its *Amended Report And Order* in Case Nos. ER-2022-0129 and ER-2022-0130 which adopted TOU rates, one plan to be implemented on a default basis.²⁴

B. Motion For Summary Disposition of Count 4

34. Based upon these undisputed facts, the Commission should grant Evergy's Motion For Summary Disposition of Count 4 and find Evergy has complied with the terms of the Stipulation and Agreement approved in by the Commission in the File Nos. ER-2018-0145 and ER-2018-016). The Commission should dismiss Count 4.

COUNT 5

35. Count 5 alleges that "Evergy has not complied with the Commission's order in the *Amended Report and Order* in Case Nos. ER-2022-0129 and ER-2022-0130, to implement a

²² Non-Unanimous Partial Stipulation And Agreement Concerning Rate Design Issues, p. 7, File Nos. ER-2018-0145 and ER-2018-0146. (Attachment No. 5).

²³ Ex. 19 and 20, Caisley Direct, pp. 20-26; Ex. 49, Lutz Direct, pp. 19-33, File Nos. ER-2022-0129 and ER-2022-0130. (Attachment Nos. 6 and 7)

²⁴ Amended Report And Order, pp. 58-74, File Nos. ER-2022-0129 and ER-2022-0130 (issued on December 8, 2022)(Attachment No. 8)

program to engage and educate customers in the approximately ten-month lead-in time until its tariff provisions regarding the 2-period TOU rate as the default rate for residential customers becomes effective."²⁵

- 36. In <u>Re Collaborative Workshop for Customer Education and Outreach Regarding</u> the Introduction of Default Time-of-Use Rates by Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West, File No. EW-2023-0199, Evergy has in good faith engaged in a collaborative effort to solicit the participation of the Staff, Public Counsel, and the Commission itself in the development of the engagement and education program associated with the mandatory TOU rates ordered by the Commission.
- 37. As the Commission knows, Evergy itself requested the establishment of a working docket for this purpose. ²⁶ The Commission adopted the Company's recommendation and opened a working docket, File No. EW-2023-0199, to allow "anyone with an interest in this matter may view documents and may submit any pertinent responsive comments or documents. ²⁷ The Order also directed: "Evergy to file a status report addressing the operations, communications, and expectations of the workshop. The status report may include any other pertinent details." ²⁸ Pursuant to the Commission's *Order Opening A Workshop Case* and subsequent orders, Evergy conducted three workshop presentations, ²⁹ made a presentation on August 10, 2023 to the

²⁵ Amended Complaint, ¶ 47.

²⁶ See Evergy Missouri Metro's And Evergy Missouri West's Motion For Reconsideration, Or In The Alternative, Application For Rehearing, p. 10, para. 17, File Nos. ER-2022-0129/0130 (filed Dec. 5, 2022).

²⁷ Order Opening a Working Case, Re A Collaborative Workshop for Customer Education and Outreach Regarding the Introduction of Default Time-of-Use Rates by Evergy Metro, Inc. D/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. D/b/a Evergy Missouri West (Dec. 21, 2023); See also Amended Report and Order, p. 99, para. 12, File Nos. ER-2022-0129/0130 (Dec. 8, 2022).

²⁸ See *Order Opening a Working Case*, Re A Collaborative Workshop for Customer Education and Outreach Regarding the Introduction of Default Time-of-Use Rates by Evergy Metro, Inc. D/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. D/b/a Evergy Missouri West (Dec. 21, 2023).

²⁹ See Notice of Presentations, File No. EW-2023-0199 (filed on March 29, 2023 for March 28th Workshop, and May 25, 2023 for May 23rd Workshop.

Commissioners at its Agenda Meeting,³⁰ and filed Quarterly Reports and Weekly Operational Updates³¹, and made an on-the-record presentation to the Commission on November 28, 2023, January 22, 2024, and April 2, 2024.³²

38. Following the August 10, 2023, Agenda presentation by Chuck Caisley, Evergy's Senior Vice President, Public Affairs and Chief Customer Officer, and Katie McDonald, Evergy's Vice President, Public Affairs, the Commission also issued its *Order Directing Time-Of-Use Customer Choice Transition Reporting* which ordered that the Company file monthly updates to a list of items set forth in the order and directed that the Company make a progress report presentation regarding TOU education and implementation process at an on-the-record presentation to be scheduled in November, 2023, January 22, 2024, and April, 2, 2024. ³³ On November 28, 2023, Mr. Caisley and Ms. McDonald made an on-the-record presentation which updated the Commission and the stakeholders of the significant progress the Company has made in completing the TOU Implementation Plan. The Commission has also conducted follow-up on-the-record presentations on January 22, 2024, and April 2, 2024. Staff and OPC were also given the opportunity to comment and file responses to the Company's presentations. ³⁴

39. Pursuant to the August 30, 2023 Order, the Company filed Weekly Operations Metrics Updates on September 1, 8, 15, 22, 29, and October 6, 13, 20, 27, and November 3, 9, 17

³⁰ Notice of Filing Agenda Presentation, File No. EW-2023-0199 (filed on Aug. 11, 2023 for August 10th Agenda Presentation).

³¹ Weekly Operational Metrics Updates, File No. EW-2023-0199 (filed on Aug. 8, and 25, Sept. 8, 15, 22, 29, and Oct. 6, 13, 20, 27, and Nov. 3, 9,17, 27, and December 4, 2023). On December 11, 2023, the Company filed a Response to Order Directing Time-of-Use Customer Choice Transition Reporting which included updates on previous dashboard information and marketing and educational information.

³² Notice of Presentation to Commission, Notice of Presentation (filed November 27, 2023); Notice of On-the-Record Presentation (filed on filed on January 18, 2024); Notice of Presentation (filed on March 29, 2024) in File No. EW-2023-0199.

³³ Order Directing Time-Of-Use Customer Choice Transition Reporting, File No. EW-2023-0199 (Aug. 8, 2023).

³⁴ See Staff Response to Evergy's November 28, 2023 Presentation (filed December 6, 2023), Staff Response to December 18, 2023 Presentation and Request for Additional Information (filed January 10, 2024), and Staff Response To April 2, 2024, Presentation Barriers To Net Metering Under Time Of Use Rate Structures Final Report And Requests For Additional Information (filed April 19, 2024).

and 27, 2023 which detailed the progress of the TOU Implementation Program.³⁵ The Company also filed monthly education and outreach PowerPoint decks that provided the tactics and execution updates related to the outreach and education plan. ³⁶.

- 40. On October 10, 2023, Evergy filed its *Response to Order Directing Time-of-Use Customer Choice Transition Reporting*. The Response and its attachments contain extensive evidence of the overall success of the Company's efforts to engage and educate Evergy's customers regarding the existence of the TOU rate program and the details of its plans. In particular, the TOU Dashboard for November 2023, indicates that 98% of Evergy's customers are aware that there are new TOU rate options, and 155,922 customers had pre-selected a TOU rate option, as of November, 2023.³⁷
- 41. Based upon the results shown on the TOU Education and Outreach Dashboard, the benchmarks and goals associated with nearly every communication channel, including Bill Message/Inserts, Billboards, Digital Display, Direct Mail, Email, Events, Media Relations, and Newspaper and Church Ads, have been met and exceeded.³⁸
- 42. On March 29, 2024, Evergy filed its Notice of Presentation for the April 2, 2024, On-the-Record presentation which provided recent information concerning the success of the Company's engagement and education program. It demonstrated that customers had high awareness of the change to TOU rates, and they continue to increase their understanding of the plan details. The presentation also explained that Phases 4-5 will focus on helping customers gain

³⁵ Weekly Operational Metrics Updates, File No. EW-2023-0199 (filed on Sept. 8, 22, 29, Oct. 6 d 13, 20, 27 and November 3, 9, 17, and 27, 2023).

³⁶ See *Notice of Filing* (Sep. 8, 2023) and *Response to Order Directing Transition Reporting* (Oct. 10, 2023 and December 11. 2023), File No. EW-2023-0199.

³⁷ See Notice of Presentation, Ex. A, p. 4 of 27 (filed November 27, 2023).

³⁸ See Notice of Presentation, Ex. A, p. 17 of 27 (filed November 27, 2023).

a deeper knowledge of their plan and seasonal impacts. Phase 4 education is focused on winter heating season and MEEIA energy efficiency offers. Phase 5 will remind customers of the change to summer prices and provide tools and tips to help avoid peak usage during the summer.³⁹

43. Based upon the evidence available, there is no basis for Staff's allegation that "Evergy has not complied with the Commission's order in the *Amended Report and Order* in Case Nos. ER-2022-0129 and ER-2022-0130 to implement a program to engage and educate customers in the approximately ten-month lead-in time until its tariff provisions regarding the 2-period TOU rate as the default rate for residential customers becomes effective." (Amended Complaint, p. 17, para. 47) For these reasons, Count 5 should be dismissed.

A. Material Undisputed Facts Regarding Count 5

- 1) On December 21, 2022, the Commission issued its *Order Opening a Working Case* in File No. EW-2023-0199 which was established as a repository for documents and comments regarding Evergy's introduction of default TOU rates.
- 2) In <u>Re Collaborative Workshop for Customer Education and Outreach</u>
 Regarding the Introduction of Default Time-of-Use Rates by Evergy Metro, Inc. <u>d/b/a</u>
 Evergy Missouri Metro and Evergy Missouri West, Inc. <u>d/b/a</u> Evergy Missouri West, File
 No. EW-2023-0199, Evergy has engaged in a collaborative effort to solicit the participation
 of the Staff, Public Counsel, and the Commission itself in the development of the
 engagement and education program associated with the mandatory TOU rates ordered by
 the Commission.

-

³⁹ Notice of Presentation, File No. EW-2023-0199 (filed January 29, 2024), Slides 16.

- The Commission adopted the Company's recommendation and opened a working docket, File No. EW-2023-0199, to allow "anyone with an interest in this matter may view documents and may submit any pertinent responsive comments or documents. ⁴¹ The Order also directed: "Evergy to file a status report addressing the operations, communications, and expectations of the workshop. The status report may include any other pertinent details." Pursuant to the Commission's *Order Opening A Workshop Case* and subsequent orders, Evergy conducted three workshop presentations, ⁴³ made a presentation on August 10, 2023 to the Commissioners at its Agenda Meeting, ⁴⁴ and filed Quarterly Reports and Weekly Operational Updates ⁴⁵, and made an on-the-record presentation to the Commission on November 28, 2023, January 22, 2024, and April 2, 2024. ⁴⁶
- 4) Following the August 10, 2023, Agenda presentation by Chuck Caisley, Evergy's Senior Vice President, Public Affairs and Chief Customer Officer, and Katie

⁴⁰ See Evergy Missouri Metro's And Evergy Missouri West's Motion For Reconsideration, Or In The Alternative, Application For Rehearing, p. 10, para. 17, File Nos. ER-2022-0129/0130 (filed Dec. 5, 2022).

⁴¹ Order Opening a Working Case, Re A Collaborative Workshop for Customer Education and Outreach Regarding the Introduction of Default Time-of-Use Rates by Evergy Metro, Inc. D/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. D/b/a Evergy Missouri West (Dec. 21, 2023); See also Amended Report and Order, p. 99, para. 12, File Nos. ER-2022-0129/0130 (Dec. 8, 2022).

⁴² See *Order Opening a Working Case*, Re A Collaborative Workshop for Customer Education and Outreach Regarding the Introduction of Default Time-of-Use Rates by Evergy Metro, Inc. D/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. D/b/a Evergy Missouri West, File No. EW-2023-0199, (Dec. 21, 2023).

⁴³ See Notice of Presentations, File No. EW-2023-0199 (filed on March 29, 2023 for March 28th Workshop, and May 25, 2023 for May 23rd Workshop).

⁴⁴ Notice of Filing Agenda Presentation, File No. EW-2023-0199 (filed on Aug. 11, 2023 for August 10th Agenda Presentation).

⁴⁵ Weekly Operational Metrics Updates, File No. EW-2023-0199 (filed on Aug. 8, and 25, Sept. 8, 15, 22, 29, and Oct. 6, 13, 20, 27, and Nov. 3, 9,17, 27, and December 4, 2023). On December 11, 2023, the Company filed a Response to Order Directing Time-of-Use Customer Choice Transition Reporting which included updates on previous dashboard information and marketing and educational information. On April 19, 2024, the Company filed its Quarterly Time-of-Use Report.

⁴⁶ Notice of Presentation to Commission, Notice of Presentation (filed November 27, 2023); Notice of On-the-Record Presentation (filed on filed on January 18, 2024); Notice of Presentation (filed on March 29, 2024) in File No. EW-2023-0199.

McDonald, Evergy's Senior Director, Public Affairs⁴⁷, the Commission also issued its *Order Directing Time-Of-Use Customer Choice Transition Reporting* which ordered that the Company file monthly updates to a list of items set forth in the order and directed that the Company make a progress report presentation regarding TOU education and implementation process at an on-the-record presentation to be scheduled in November, 2023, January 22, 2024, and April, 2, 2024. On November 28, 2023, Mr. Caisley and Ms. McDonald made an on-the-record presentation which updated the Commission and the stakeholders of the significant progress the Company has made in completing the Commission-approved TOU Implementation Plan. The Commission has also conducted follow-up on-the-record presentation on January 22, 2024, and April 2, 2024. Staff and OPC were also given the opportunity to comment and file responses to the Company's presentations. ⁴⁹

5) Pursuant to the August 30, 2023 Order, the Company filed Weekly Operations Metrics Updates on September 1, 8, 15, 22, 29, and October 6,13, 20, 27, and November 3, 9, 17 and 27, 2023, and December 4, 2023, which detailed the progress of the TOU Implementation Program.⁵⁰ The Company also filed monthly education and outreach PowerPoint decks that provided all the tactics and execution updates related to the outreach and education plan. ⁵¹

⁴⁷ Ms. McDonald's current title is Vice-President—Public Affairs.

⁴⁸ Order Directing Time-Of-Use Customer Choice Transition Reporting, File No. EW-2023-0199 (Aug. 8, 2023).

⁴⁹ See Staff Response to Evergy's November 28, 2023 Presentation, and Staff Response to December 18, 2023 Presentation and Request for Additional Information and Staff Response to April 2, 2024, Presentation Barriers to Net Metering Under Time of Use Rate Structures Final Report and Requests for Additional Information (filed April 19, 2024).

⁵⁰ Weekly Operational Metrics Updates, File No. EW-2023-0199 (filed on Sept. 8, 22, 29, and Oct. 6 and 13, 2023, November 3, 9, 17, and 27, and December 4, 2023).

⁵¹ See *Notice of Filing* (Sep. 8, 2023) and *Response to Order Directing Transition Reporting* (Oct. 10, 2023 and December 11, 2023), and Notice of Presentation, (filed March 29, 2024), File No. EW-2023-0199.

- On October 10, 2023, Evergy filed its *Response to Order Directing Time-of-Use Customer Choice Transition Reporting*. The *Response* and its attachments contain extensive evidence of the overall success of the Company's efforts to engage and educate Evergy's customers regarding the existence of the TOU rate program and the details of its plans. In particular, the TOU Dashboard for November 2023, indicates that **98% of Evergy's customers are aware that there are new TOU rate options, and 155,922 customers have pre-selected a TOU rate option, as of November, 2023.**⁵²
- 7) Based upon the results shown on the TOU Education and Outreach
 Dashboard, the benchmarks and goals associated with nearly every communication
 channel, including Bill Message/Inserts, Billboards, Digital Display, Direct Mail, Email,
 Events, Media Relations, and Newspaper and Church Ads, have been met and
 exceeded.⁵³
- 8) On March 29, 2024, Evergy filed its Notice of Presentation for the April 2, 2024, On-the-Record presentation which provided the most recent information concerning the success of the Company's engagement and education program. It demonstrated that customers had high awareness of the change to TOU rates, and they continue to increase their understanding of the plan details. The presentation also explained that Phases 4-5 will focus on helping customers gain a deeper knowledge of their plan and seasonal impacts. Phase 4 education is focused on winter heating season and MEEIA energy efficiency offers. Phase 5 will remind customers of the change to summer prices and provide tools and tips to help avoid peak usage during the summer.⁵⁴

⁵² See Notice of Presentation, Ex. A, p. 4 of 27 (filed November 27, 2023).

⁵³ See Notice of Presentation, Ex. A, p. 17 of 27 (filed November 27, 2023).

⁵⁴ Notice of Presentation, File No. EW-2023-0199 (filed January 29, 2024), Slide 16.

B. Motion For Summary Disposition of Count 5

- 44. Based upon these undisputed facts, the Commission should grant Evergy's Motion For Summary Disposition of Count 5 and find that Evergy has complied with the Commission's order in the *Amended Report and Order* in Case Nos. ER-2022-0129 and ER-2022-0130, to implement a program to engage and educate customers in the approximately ten-month lead-in time until its tariff provisions regarding the TOU rate plan approved by the Commission.
- 45. Based upon the undisputed material facts, there is no basis for Staff's allegation that "Evergy has not complied with the Commission's order in the *Amended Report and Order* in Case Nos. ER-2022-0129 and ER-2022-0130 to implement a program to engage and educate customers in the approximately ten-month lead-in time until its tariff provisions regarding the 2-period TOU rate as the default rate for residential customers becomes effective." (Amended Complaint, p. 17, para. 47) For these reasons, Count 5 should be dismissed.

COUNT 6

- 46. Count 6 alleges that "Evergy's attempts at customer education were unreasonable in that they were alarmist and failed to include simple information describing time-based rate plans. Further, Evergy's attempts at customer education are misleading as to the design and operation of the rate plans across seasons."⁵⁵
- 47. For the same reasons explained in reference to Count 5 above, the Commission should dismiss Count 6 since it has already reviewed Evergy's TOU Implementation Plan and its subsequent efforts to engage and educate its customers regarding TOU rates, and no further litigation is necessary or helpful in this regard.

-

⁵⁵ Amended Complaint, ¶ 54.

- 48. Evergy does not know Staff's motivations for filing of this Amended Complaint at this juncture of Evergy's TOU Implementation Plan. However, it is apparent that this Amended Complaint was totally unnecessary and duplicative of the efforts of Evergy and other parties to effectively implement the default TOU rate and other optional TOU rates.
- 49. For all the reasons stated above, the Amended Complaint should be dismissed in its entirety.

A. Material Undisputed Facts Regarding Count 6

1) The material undisputed facts discussed above in relation to Count 5 also are applicable to Count 6, and are incorporated herein by reference.

B. Motion For Summary Disposition of Count 6

50. Based upon these undisputed facts, the Commission should grant Evergy's Motion For Summary Disposition of Count 6 and find that Evergy has complied with the Commission's order in the *Amended Report and Order* in Case Nos. ER-2022-0129 and ER-2022-0130, to implement a program to engage and educate customers in the approximately ten-month lead-in time until its tariff provisions regarding the TOU rate plan approved by the Commission.

IV. LEGAL MEMORANDUM IN SUPPORT OF MOTION FOR SUMMARY DISPOSITION

51. Summary judgment should be granted in favor of the moving party as a matter of law when there is no genuine issue of material fact. <u>Allied Mutual Ins. Co. v. Brown</u>, 105 S.W.3d 543, 545 (Mo.App. E.D. 2003). Thus, the Missouri Supreme Court has stated:

[t]he burden on a summary judgment movant is to show the right to judgment flowing from facts about which there is no genuine dispute. Summary judgment tests simply for the existence, not the extent, of these genuine disputes. <u>ITT Commercial Finance Corp. v. Mid-American Marine Supply Corp.</u>, 854 S.W.2d 371, 378 (Mo. 1993)

- 52. Commission Rule 20 CSR 4240-2.117(1)(E) authorizes summary determination "if the pleadings, testimony, discovery, affidavits, and memoranda on file show that there is no genuine issue as to any material fact, that any party is entitled to relief as a matter of law as to all or any part of the case, and the commission determines that it is in the public interest."
- 53. These Suggestions constitute the "separate legal memorandum" that must be "attached" to a motion for summary determination pursuant to Rule 20 CSR 4240-2.117(1)(B). Evergy suggests that its motion and suggestions demonstrate that there is no dispute of material fact, that Evergy is entitled to relief as a matter of law and that the public interest demands that Evergy's motion be sustained.
- 54. In <u>CenturyTel of Missouri, LLC v. Socket Telecom, LLC</u>, Case No. IC-2008-0068, the Commission explained the standard for granting a motion for summary determination:

For summary determination to be proper, there must not be a dispute among the parties as to any issue of material fact, the party seeking summary determination must be entitled to judgment as a matter of law, and the Commission must determine that granting summary determination is in the public interest. Differing interpretations of language in an agreement does not constitute a dispute as to a material fact. Where an ambiguity exists in a contract and the court must utilize parole evidence to determine the parties' intent, a fact issue exists that generally precludes summary judgment. However, parole evidence is not necessary to discern the signatories' intent in this case, because their stated intent in executing the Interconnection Agreements was to comply with the Commission's final arbitration decision.⁵⁶

55. In a proper case, summary determination conserves scarce resources, both fiscal and human, for the Commission and for all the parties. In such cases (as in this one), summary disposition is favored. Because the interpretation of a Commission order, stipulation and agreement, or other contracts is a question of law, see Goellner v. Goellner Printing, 226 S.W.3d

22

_

⁵⁶ Order Granting CenturyTel's Motion For Summary Determination, CenturyTel of Missouri LLC v. Socket Telecom, LLC, Case No. IC-2008-0068 (Sept. 9, 2008)(footnotes omitted).

176, 178 (Mo.App. E.D. 2007), summary judgment is particularly appropriate when the construction of a Commission order, unambiguous stipulations and agreements or contract is at issue. See <u>Lupo v. Shelter Mutual Ins. Co.</u>, 70 S.W.3d 16, 18-19 (Mo.App. E.D. 2002). The Public Service Commission is entitled to interpret its own orders and to ascribe to them a proper meaning. See <u>State ex rel. Laclede Gas Co. v. Public Service Com'n of State</u>, 392 S.W.3d 24 (Mo.App. W.D., 2012)

- 56. In Missouri, the guiding principle of contract interpretation is that a tribunal or court will seek to ascertain the intent of the parties and to give effect to that intent. <u>Triarch Industries</u>, <u>Inc. v. Crabtree</u>, 158 S.W.3d 772, 776 (Mo. 2005) (en banc). The intent of the parties to a contract is presumed to be expressed by the ordinary meaning of the contract's terms. <u>Id</u>. If the contract is unambiguous, it will be enforced according to its terms. Id. See also <u>Leggett v. Missouri State Life</u> Ins. co., 342 S.W.2d 833, 851 (Mo. 1961).
- 57. Based upon the foregoing, the Commission should find that there are no genuine issues of any material fact, that Evergy is entitled to relief as a matter of law, and that granting summary relief is in the public interest.

WHEREFORE, the Company respectfully requests that the Commission dismiss the Amended Complaint for the reasons explained herein.

Respectfully submitted,

|s| Roger W. Steiner

Roger W. Steiner, MBN 39586 Evergy, Inc. 1200 Main Street Kansas City, MO 64105 Phone: (816) 556-2791

Fax: (816) 556-2787

roger.steiner@evergy.com

James M. Fischer, MBN 27543 Fischer & Dority, P.C. 2081 Honeysuckle Lane Jefferson City, MO 65109 Phone: (573) 353-8647

jfischerpc@aol.com

COUNSEL FOR EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed to counsel of record for all parties this 24th day of April 2024.

|s| Roger W. Steiner

Roger W. Steiner

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's Request for Authority to Implement A General Rate Increase for Electric Service)))	Case No. ER-2022-0129
In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Request for Authority to Implement A General Rate Increase for Electric Service))	Case No. ER-2022-0130

MOTION TO ESTABLISH DOCKET FOR FURTHER CONSIDERATION OF DATA PRODUCTION

COME NOW Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("EMM") and Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("EMW") (collectively, the "Company"), by and through their counsel and, for their *Motion to Establish Docket for Further Consideration of Data Production* ("Motion") states as follows:

- 1. On August 30, 2022, the Company filed a *Stipulation and Agreement* ("Stipulation") in the above-captioned dockets.
- 2. On September 22, 2022, the Missouri Public Service Commission ("Commission") issued its *Order Approving Four Partial Stipulations and Agreements* ("Order") which encompassed approval of the Stipulation referenced above.
 - 3. Per the approved Stipulation the Company agreed to the following:

Data Retention:

a) Prior to July 1, 2023, the Company will identify and provide the data requested in the direct testimony of Sarah Lange. If the requested data is not available or cost-prohibitive to produce, the Company will file a motion to establish an EO docket. In that docket the Company will provide the reason why it cannot provide the requested data and its individual estimate

of the cost to provide each set of requested data, for the further consideration of the parties and the Commission. 12

- 4. The purpose of this pleading is to request the opening of an EO docket so that Evergy can provide in detail the reasons why the requested data is not available and cost-prohibitive to produce.
- 5. In preparation for this pleading Evergy reevaluated the data requested by Staff and assessed the feasibility of producing the data. If the data were not on hand, Evergy examined the level of effort and timeline associated with securing and generating the data. Generally, the data requested resides in disparate systems and is not easily available for direct query. To locate, access, download, and assimilate the required data to provide the data requested by Staff, it is expected that external expertise will be needed to supplement Evergy's internal capabilities. In some cases, the data was not believed to be available to satisfy the Staff's request and organizational process changes would be required to begin generating the requested data.
- 6. To estimate the cost of obtaining the requested data, Evergy consulted with internal staff and consultants familiar with some of our major systems to consider a range. Absent a detailed scope of work, precision is not possible, but all expert opinions have determined that it will be a costly effort that would be material, exceeding one million dollars and requiring in excess of eighteen months to complete. Some estimates, associated with broad interpretations of the data needs are more extreme, exceeding \$100 million and requiring multiple years to complete. Precise

¹ See, Stipulation, p. 12, Rate Design and Program Settlement, §4(a).

² The data requested in the direct testimony of Staff ("Staff") witness Sarah Lange is detailed in witness Lange's direct testimony on p. 62, ln. 1 through p. 64, ln. 28.

estimates of cost and duration will only be possible once detailed scope of work with exact requirements are fully known and understood.

- 7. It was observed that most of the Evergy's subject matter experts ("SMEs") required to accomplish this task are already committed to the execution of the Missouri Residential TOU migration preparation. This severely limited the SME's ability to evaluate the need in detail or to produce the requested data by the July 1st filing date.
- 8. In opening this EO docket, Evergy requests the Commission consider the impact of the Missouri Residential TOU migration in setting the procedural schedule. It would be reasonable to expect that billing system and technology personnel will be constrained through the summer of 2024 responding to customer needs. Evergy requests that the Commission schedule a prehearing conference for the purpose of developing a realistic procedural schedule for the docket.
- 9. On June 14, 2023, the Commission issued its *Report and Order* ("Ameren Missouri Order") in ER-2022-0337 and ordered on p. 48 that Ameren Missouri to prepare a study of customer specific information by account, rate schedule and voltage by its next rate case.³ Many aspects of the data ordered for this study are similar to the data requested by Staff from Evergy. Evergy believes it would be more efficient to include Ameren Missouri in the requested EO-docket so that the Commission and Staff can address the issue of data availability in one proceeding.

³ On page 49 of the Ameren Missouri Order, the Commission stated:

[&]quot;The Commission is reluctant to order Ameren Missouri to provide all the information that Staff requested, not because the Commission believes it unnecessary, but because the Commission does not know the full extent of information Ameren Missouri can provide, or the expense associated with collecting that information. The Commission finds it reasonable that Ameren Missouri provide more granular data for any rate modernization workshop, nonresidential working docket, and the Company's next rate case. Therefore, the Commission directs Ameren Missouri to provide the information Staff requested that it can provide at reasonable expense. Ameren Missouri shall also work with Staff to provide a better understanding of what information is available, so that Staff can better request information the Company can access."

10. Ameren Missouri has indicated that it will participate in the docket in hopes of

resolving the data collection matters discussed herein.

Although The Empire District Electric Company d/b/a Liberty is not under a 11.

Commission order to collect similar data, Liberty recognizes the need to understand and resolve

the issue of data availability as it relates to collecting similar customer-specific information in the

future. Liberty therefore also does not oppose a docket to resolve these issues that includes the

participation of Liberty.

12. At the conclusion of this docket, the Company will seek to obtain specific guidance

from the Commission on what data and level of effort is reasonable to address Staff's stated need.

WHEREFORE, the Company requests the Commission issue an order establishing a new

EO docket for further consideration of the issues referenced herein.

Respectfully submitted,

s Roger W. Steiner

Roger W. Steiner, MBN 39586

Phone: (816) 556-2314

E-mail: roger.steiner@evergy.com

Evergy, Inc.

1200 Main – 16th Floor Kansas City, Missouri 64105

Fax: (816) 556-2110

James M. Fischer, MBN 27543

Fischer & Dority, P.C.

2081 Honeysuckle Lane

Jefferson City, Missouri 65109

Phone: (573) 353-8647

ifischerpc@aol.com

Attorneys for Evergy Missouri Metro and Evergy

Missouri West

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served upon counsel for all parties on this 30th day of June 2022, by either e-mail or U.S. Mail, postage prepaid.

|s| Roger W. Steiner

Roger W. Steiner

Exhibit No.:

Issue: Data Retention
Witness: Bradley D. Lutz
Type of Exhibit: Direct Testimony

Sponsoring Party: Evergy Missouri Metro and Evergy

Missouri West

Case No.: EO-2024-0002
Date Testimony Prepared: November 1, 2023

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: EO-2024-0002

DIRECT TESTIMONY

OF

BRADLEY D. LUTZ

ON BEHALF OF

EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST

Kansas City, Missouri November 2023

TABLE OF CONTENTS

I.	THE DATA RETENTION COMMITMENT	3
II.	THE COMPANY POSITION CONCERNING THE DATA REQUESTED	14

DIRECT TESTIMONY

OF

BRADLEY D. LUTZ

Case No. EO-2024-0002

1	Q:	Please state your name and business address.
2	A:	My name is Bradley D. Lutz. My business address is 1200 Main, Kansas City, Missouri
3		64105.
4	Q:	By whom and in what capacity are you employed?
5	A:	I am employed by Evergy Metro, Inc. I serve as Director, Regulatory Affairs for Evergy
6		Metro, Inc. d/b/a as Evergy Missouri Metro ("Evergy Missouri Metro"), Evergy Missouri
7		West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West"), Evergy Metro, Inc. d/b/a
8		Evergy Kansas Metro ("Evergy Kansas Metro"), and Evergy Kansas Central, Inc. and
9		Evergy South, Inc., collectively d/b/a as Evergy Kansas Central ("Evergy Kansas Central")
10		the operating utilities of Evergy, Inc.
11	Q:	On whose behalf are you testifying?
12	A :	I am testifying on behalf of Evergy Missouri Metro and Evergy Missouri West
13		(collectively, the "Company" or "Evergy").
14	Q:	What are your responsibilities?
15	A:	My current responsibilities are focused on rates, regulatory operations and customer issues,
16		providing support and oversight for a wide range of regulatory work including
17		determination of retail revenues, load analysis, rate design, class cost of service, tariff
18		administration, compliance reporting, response to customer complaints, docket
19		management system administration, general tariff administration, and relationship

1		development for the Company's regulatory activities in the Missouri and Kansas
2		jurisdictions.
3	Q:	Please describe your education, experience and employment history.
4	A:	I hold a Master of Business Administration from Northwest Missouri State University and
5		a Bachelor of Science degree in Engineering Technology from Missouri Western State
6		University.
7		I joined Evergy, then Kansas City Power & Light, in August 2002 as an Auditor in
8		the Audit Services Department. I moved to the Company's Regulatory Affairs group in
9		September 2005 as a Regulatory Analyst where my primary responsibilities included
10		support of our rate design and class cost of service efforts. I was promoted to Manager in
11		November 2010 and was promoted to my current position in March 2020.
12		Prior to joining Evergy, I was employed by the St. Joseph Frontier Casino for two
13		years as Information Technology Manager. Prior to St. Joseph Frontier Casino, I was
14		employed by St. Joseph Light and Power Company for nearly 14 years. I held various
15		technical positions at St. Joseph Light and Power Company, including Engineering
16		Technician-Distribution, Automated Mapping/Facilities Management Coordinator, and
17		my final position as Senior Client Support Specialist-Information Technology.
18	Q:	Have you previously testified in a proceeding before the Missouri Public Service
19		Commission ("Commission" or "MPSC") or before any other utility regulatory
20		agency?
21	A:	Yes, I have testified multiple times before the Commission concerning tariff, class cost of
22		service and rate design topics as part of various recent proceedings. Additionally, I have

testified multiple times before the Kansas Corporation Commission.

23

1	Q:	What is the purpose of your testimony?
2	A:	I will address the following topics in my testimony:
3		I. The Data Retention Commitment
4		II. Company Position concerning the data requested
5		I. THE DATA RETENTION COMMITMENT
6	Q:	Please explain the Data Retention Commitment driving this case.
7	A:	As part of Stipulation and Agreement reached and approved in its last general rate
8		proceeding under case No. ER-2022-0129/0130 ("0129/0130 Stipulation"), Evergy agreed
9		to:
10 11 12 13 14 15 16		Prior to July 1, 2023, the Company will identify and provide the data requested in the direct testimony of Sarah Lange. If the requested data is not available or cost-prohibitive to produce, the Company will file a motion to establish an EO docket. In that docket the Company will provide the reason why it cannot provide the requested data and its individual estimate of the cost to provide each set of requested data, for the further consideration of the parties and the Commission.
17 18 19 20 21 22		 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;.
23 24 25		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;
26 27 28 29		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;
30 31 32		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;

1 2 3 4		a.	variou voltag	ch rate code on which customers may take service at s voltages, the number of customers served at each e on the first day of the month and the last day of the which interval meter readings are obtained;
5 6	4.			code for which service is available at a single voltage, stomers' interval meter readings, by interval;
7 8 9		a.	variou	ch rate code on which customers may take service at s voltages, the sum of customers' interval meter gs, by interval and by voltage;
10 11 12 13 14	5.	for the in part interval	compa ts 4. an	l adjustments to customer interval data are necessary ny's billing system to bill the interval data referenced ad 4.a., such adjustments should be applied to each ding prior to the customers' data being summed for
15 16 17 18	6.	subsets made,	s for m	time the Commission may designate certain customer fore granular study. If such designations have been formation required under parts $1-5$ should be provided those instances.
19 20 21 22	7.	fourtee interva	en mont als of les	tomer interval data shall be retained for a minimum of ths. If individual data is acquired by the Company in ss than one hour in duration, such data shall be retained no less than one hour.
23	8.	Evergy	y shall:	
24 25		a.		individual hourly data for use in providing bill rison tools for customers to compare rate alternatives.
26 27		b.	Retain	coincident peak determinants for use in future rate dings.
28		c.	Provid	le to Staff upon request:
29			1)	the information described in part 1;
30 31			2)	a minimum of 12 months of the data described in parts 2-5;
32 33 34 35 36			3)	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);

1 2 3 4 5		4) 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).
6 7 8 9 10		d. For purposes of general rate proceedings, Evergy shall provide all data described above for a period of not less than 36 months, except that Staff does not request individual customer data for 36 months except as described in part 8.c.3.
11 12 13 14		9. Develop the determinants for assessment of an on-peak demand charge to replace the current monthly billing demand charge, and for potential implementation for customers not currently subject to a demand charge; and
15 16 17		10. EMM and EMW begin to retain and study data related to the reactive demand requirements of each rate code, and sample customers within each rate code. ¹
18	Q:	Was the Company able to provide the data requested by the established date?
19	A:	No.
20	Q:	Did the Company determine the data is not available or cost-prohibitive to produce?
21	A:	Yes.
22	Q:	Did the Company file a motion to establish an EO docket prior to July 1, 2023, as
23		indicated in the Stipulation and Agreement?
24	A:	Yes.
25	Q:	Is the Direct Testimony offered in this EO docket intended to provide the reason why
26		the Company cannot provide the requested data and the Company's individual
27		estimate of the cost to provide each set of requested data, for the further consideration
28		of the parties and the Commission?
29	A:	Yes.

 1 $\underline{See},$ p. 12, ER-2022-0129/0130 Stipulation and Agreement, filed August 30, 2022.

Q:	What is	the structure	of the (Company	testimony	7 ?
----	---------	---------------	----------	---------	-----------	------------

4

5

6

7

8

9

10

11

18

21

22

- 2 A: The Company offers the testimony of three witnesses to address this commitment. In addition to my testimony, described earlier, the Company offers the testimony of,
 - Julie Dragoo, Senior Director of Strategy and Support explaining the Company systems, detailing the data relationships and providing further support for the cost estimates detailed in my testimony. She has responsibility for many of the Company systems related to these data retention requests.
 - Sean Riley, Partner with PricewaterhouseCoopers LLP ("PwC") offering insights into industry practices and confirmation that Evergy is following normal practice with its systems and data management. He also offers reaction to select Staff data retention requests.
- 12 Q: Please describe why the Company was unable to provide the requested data and provide an individual estimate of the cost to provide each set of requested data.
- 14 A: The issues varied across the data requests. Given the complexity and detail of the data requested, the Company has prepared a summary table of the assessment, provided as

 16 Confidential Exhibit BDL-1, detailing the respective requests, providing a response for each concerning the,
 - Availability Is the requested data present in the Company systems?
- Deliverability Can the data be extracted and processed/formatted in a manner consistent with the request?
 - Estimated Cost to provide the cost to produce the data in the format, interval, and other criteria set within the request as specified by the Company through analysis of the request.

1 •	Applicable Notes -	additional info	ormation informa	ative to the assessment.
-----	--------------------	-----------------	------------------	--------------------------

A:

То	aid ii	n examination	of	the	assessment,	the	Company	has	used	traffic	signal
coloring to	repre	sent the relativ	е с	omp	arisons.						

Q: Please describe the process used to evaluate the data and produce the summary assessment.

The assessment summary table was prepared to capture the efforts of a team of Company subject matter experts to provide the data. Given the breadth of data being requested, a cross functional team was assembled to respond to the availability of the requested data. The team included representatives of Evergy's Customer Operations, Customer Analytics, Customer Systems, Application Systems, Property Accounting, Geographic Information Services Support, Engineering & Analytics, Support Services Departments. This team included individuals with direct administrative and operational knowledge of Company Billing, Mapping, Work Management, Plant Accounting, and Meter Data Management systems. These individuals have direct experience with managing the data within the systems.

requests were received from Staff with the complete team beginning formal work in September 2022 shortly after the 0129/0130 Stipulation was filed. Work to provide the data requested continued until June 2023 when it was clear that that the data would not be provided by the July 1 target date. Work then focused on the EO case and documenting the data availability and deliverability.

1	Q:	The cost estimates are offered in ranges of cost.	Why is this necessary?
---	----	---------------------------------------------------	------------------------

Q:

A:

A: In general, the cost to configure or customize computer systems can vary dramatically.

Precise estimates require detailed specifications to account for all required modifications.

Absent these specifications, there is variability in the final cost results. With the summary

table the Company provides informative cost estimates to facilitate examination in this docket, but asserts that precision is not possible at this stage. Company witnesses Julie

Dragoo and Sean Riley further make this assertion in their respective testimonies.

Is it possible to summarize why was the Company was unable to provide the data as requested?

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

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

1		system are not populated backwards to the source systems, resulting in differences in the
2		data.
3	Q:	Building on this response, are there specific details that would be helpful for the
4		Commission to understand?
5	A:	Yes. I want to be clear that these systems are not deficient in their design or inadequate to
6		support Company operations or even to support historic ratemaking methods. The bulk of
7		the data requested is associated with new concepts being promoted by Staff and do not
8		align with these system purposes or with historic ratemaking.
9		Another important detail is that consideration of these data requests occurred during
0		the time constraints of discovery in the Company rate cases or during a time when
1		Company resources were committed to implementing the Commission's Order concerning
2		deployment of mandatory Time of Use rates. In both cases, limited availability of time has
13		impacted the Company response to these requests.
14	Q:	The summary table includes significant information about the Company's assessment
15		of the data requested. Is there additional information or context for the Commission
16		to consider on any of the items?
17	A:	Yes. I believe it would be helpful to highlight a number of the items. Specifically, I would
8		like to further comment on data requests 1, 5, 6 and 8.
19	Q:	What are your comments on data request 1?
20	A:	Data request 1 is the most problematic of all the data requested. Staff requests:
21 22 23 24 25 26		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;

1		Data does not exist in these combinations within the Company's systems to support
2		this request. Where some part of the cost data exists, it is not linked to customer accounts,
3		rate codes, or readily identified by voltage. Some of the elements of the request are not
4		supported within the Company's accounting practices. The testimony of Julie Dragoo and
5		Sean Riley explores this concern as well.
6	Q:	If ordered, could the Company take the steps needed to produce the data requested?
7	A:	Yes, but the effort would be significant. To establish a reliable and repeatable process to
8		support this data basic Company processes and accounting treatments would need to be
9		reworked. Application systems would need to be modified. New interfaces and linkages
10		between systems would need to be designed and implemented. Following this project level
11		work scope are estimated to cost in excess of \$80 million.
12	Q:	In your opinion, is the request for data identified in data request 1 appropriate?
13	A:	No. If additional detail about these costs is deemed necessary, I believe alternate data be
14		considered.
15	Q:	What are your comments on data request 5?
16	A:	This request is problematic, not because the source systems do not have the updated and
17		billed data information, but because the Data Hub was not built to be a replica of our
18		business source systems. The requests states,
19 20 21 22		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;
23		Data request 5 is not requesting specific data, but instead seeks to require updates
24		to original interval data if adjustments are made in systems using the data later in the
25		process. More specifically, this request sets an expectation for alignment between the Data

Hub and the MDM/CCB systems. As addressed in more detail by Company witness, Julie Dragoo, the Data Hub is the Company source for data extraction, similar to the requests raised by Staff in this proceeding. Systems such as CCB and MDM feed data to the Data Hub which is used to aggregate and analyze point in time data. To achieve alignment, significant process change would be needed to continually feed updates to the Data Hub, in a sense fully replicating the data. This form of interface does not exist and was never the intended use for Data Hub. Considerable enhancement would be required to both systems to enable it going forward. This concern does not account for the processing overhead associated with maintaining a live connection between systems.

A:

Q: If ordered, could the Company change work processes and systems to achieve this adjustment?

It is uncertain, but again, the effort would be significant. If the Staff request for alignment between the data retained in separate systems is ordered, the Company will have to seek a fundamental redesign of its data retention logic to achieve this level of relationship. Further, work processes would need to change to address the resulting size and complexity of the Data Hub. An additional element of concern would be the potential impact of this logic change on our corporate infrastructure. It is possible that these levels of alignment will require additional enhancement and expansion to incorporate this new demand within other existing business needs. Due to the expected extensive modification and controls needed to ensure data consistency the Company estimated this effort would cost in excess of \$3.75M.

1	Q:	What are your comments on data request 6?							
2	A:	Staff's request is unworkable because the request is undefined and places an unrealistic							
3		expectation on the Company. The request states,							
4 5 6 7		6. 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 $1-5$ should be provided or retained for those instances.							
8		The request lacks the detail needed to properly evaluate within this case. The							
9		second sentence identifying part $1-5$ as the information to be provided does not clarify							
10		the purpose of the request.							
11	Q:	Since this data request is undefined, is this why the Company did not provide a cost							
12		estimate for this item?							
13	A:	Yes. Data request 6 is a speculative request. The individual responses to data requests 1							
14		through 5 provide information about the costs to provide. Nothing more could be added							
15		for data request 6 at this time.							
16	Q:	What are your comments on data request 8?							
17	A:	Staff's request 8 is a multi-part request, mainly focused on data retention. The data request							
18		states:							
19		8. Evergy shall:							
20 21 22		a. Retain individual hourly data for use in providing bill comparison tools for customers to compare rate alternatives.							
23 24		b. Retain coincident peak determinants for use in future rate proceedings.							
25		c. Provide to Staff upon request:							
26		1) the information described in part 1;							

1 2		2)	a minimum of 12 months of the data described in parts 2-5;
3 4 5 6 7		3)	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);
8 9 10 11 12		4)	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).
13 14 15 16 17	d.	provid 36 m	ourposes of general rate proceedings, Evergy shall de all data described above for a period of not less than onths, except that Staff does not request individual mer data for 36 months except as described in part
18	The Company conce	erns var	y for the respective parts, but in general are centered
19	concerns about deliv	erability	y. For part a, the Company currently provides resident
20	comparison tools vi	ia a thiı	rd-party application. This capability is supplemente
21	customer-initiated d	ata acc	ess via Green Button functionality. This capability

23

24

25

26

27

28

29

eneral are centered around ly provides residential rate lity is supplemented with This capability is not available to non-residential customers due to the higher complexity of rates. For parts b, and d the data requested is retained by the Company, but depending on how the data is requested, the form of delivery can produce additional concerns. For item c, these refer to items to be provided "upon request." The Company environment does not easily support dynamic data requests, particularly if the data is expected to be tied to other data sources for rate making purposes. Again, depending on the form of the request, data that is available can be a challenge to produce. Preplanning, regular output formats and timing requirements can alleviate many of these challenges.

1	Q:	The summary table represents that several items exist or are retained but have issues
2		with the deliverability. Why is this?

A:

Q:

A:

A:

Several of the Staff data requests are for data used in our regular billing processes, so these are data which is available. However, there are elements in each that require work to execute. For example, in most cases these data extractions are not part of current processes. The queries would need to be created and processes established to execute the extractions as part of regular computer systems operations.

Are there any other factors impacting the Company's ability to provide this data?

Yes. It should be noted that the Company relies on the same personnel and the same computer environments to perform daily operations as it does to support regulatory and ratemaking needs. In its normal course of business, the Company must allocate time between these needs, often setting aside customer related work to support regulatory demands. These additional data requests from Staff add to that pressure. It is particularly difficult because many of the data requests are outside of our normal business operations and require special, one-off efforts to produce.

II. THE COMPANY POSITION CONCERNING THE DATA REQUESTED

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

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

("RAP"), titled "Electric Cost Allocation for a New Era," by Jim Lazar, Paul Chernick and William Marcus, edited by Mark LeBel. These views extended into the Liberty Utilities rate case, ER-2019-0374 and Evergy rate cases, ER-2022-0129/0130. Most recently these views toward class cost of service studies were addressed again in Ameren rate case ER-2022-0337.

The views concerning rate design structures have been more aligned with Staff's visions for rate design and with data made available with the Automated Metering Infrastructure ("AMI") deployments and I believe originated within the Evergy rate cases ER-2022-0129/0130 and again appeared in Ameren rate case ER-2022-0337. The Staff views parallel those offered by RAP in their report "Smart Rate Design for a Smart Future." If I understand the Staff intentions correctly, they prefer to ultimately move all customers to a rate structure similar to the following example from the RAP report³.

Rate Element	Based On The Cost Of	Illustrative Rate
Customer Charge	Service Drop, Billing, and Collection Only	\$4.00/month
Transformer Charge	Final Line Transformer	\$1/kVA/month
Off-Peak Energy	Baseload Resources + transmission and distribution	\$.07/kWh
Mid-Peak Energy	Baseload + Intermediate Resources + T&D	\$.09/kWh
On-Peak Energy	Baseload, Intermediate, and Peaking Resources + T&D	\$.14/kWh
Critical Peak Energy (or PTR)	Demand Response Resources	\$.74/kWh

³ <u>Id.</u>, p. 50

² Lazar, J. and Gonzalez, W. (2015). Smart Rate Design for a Smart Future. Montpelier, VT: Regulatory Assistance Project. Available at: http://www.raponline.org/document/download/id/7680.

1	As Staff has brought these cost allocation methods and rate design alternatives forward,
2	they have sought data from the Company to support them.

What has been the position of the Company to these requests?

A:

O:

A:

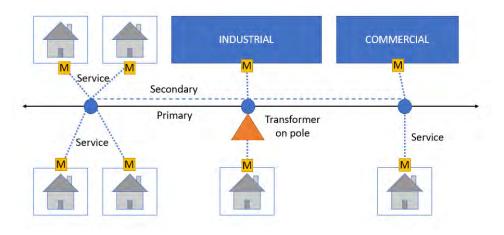
Evergy has contested these cost allocation views as part of testimony, mainly in the ER-2022-0129/0130 cases. The primary concern is that most of the requested data is not readily available nor easily produced. These points have been detailed in the Summary Table offered earlier. The Company believes current cost allocation methods are suitable to inform ratemaking, particularly since the alignment between the rates and the respective costs have been managed through other policy considerations over the years. Any incremental precision offered by these new approaches is not worth the high cost of development and maintenance.

The Company position concerning the data to support rate design is more nuanced. In some respects, the Company supports examination of new approaches, but the realities of "big data" require higher levels of consideration. Availability of large amounts of data does not mean that the data is easily accessible. Computer systems have limited capability to store and manage large data sets. As a result, the Company has contested these data requests as well.

Q: Following the efforts to produce this data, what is the Company's view of the Staff request?

As the Company began to explore the requested data more deeply with the systems experts, our prior positions were largely affirmed. While we understand Staff's desire to leverage data now captured in Evergy's systems, the expectation that the various independent systems/processes can be treated as an integrated database that will provide reporting and

1		data analytics based on dynamic end user requirements is unrealistic. Given the limitations
2		and estimated cost to provide associated with many of the requests as described in the
3		collective Company testimony, the Company cannot approach the Staff's requests lightly.
4	Q:	Beyond providing the reason why it cannot provide the requested data and an
5		estimate of the cost to provide the requested data what does the Company wish to
6		achieve within this docket?
7	A:	Responding to this data request is complicated and the Company believed moving the effort
8		outside of the constraints of a rate case would provide the best opportunity to provide the
9		data. Alternatively, if the Company were unable to provide the data, the specific EO case
10		would allow the Staff request to be evaluated by the Commission and a determination given
11		on the provision of this data.
12	Q:	In an earlier response you expressed particular concern with the data requested
13		around distribution costs by voltage. Please describe why.
14	A:	Staff seeks line transformer costs and expenses by rate code; primary distribution costs and
15		expenses by voltage; secondary distribution costs and expenses by voltage; primary voltage
16		service drop costs and expenses; line extension costs, expenses, and contributions by rate
17		code and voltage; and meter costs by voltage and rate code. To begin, in practice,
18		distribution facilities do not lend themselves to quantification by rate code. It is the nature
19		of distribution facilities to be shared across customers to provide service. The Company
20		operates a comprehensive grid to provide service to customers, not a collection of
21		individualized services. The following figure is helpful to detail this point.



In this graphic, there are three spans of primary conductor (solid lines). On the middle pole (shaded circle) is a distribution transformer (shaded triangle) that steps down the primary voltage to serve the Secondary conductors (dashed lines) or Service conductors (dotted lines). In this example, the Secondary conductors in turn feed Service conductors on other poles. The Service conductors ultimately feed customer meters (squared "M"). In this example, most metered customers are residential, but one is commercial, and one is industrial. Within this scenario, the transformer provides service to multiple customer types and as a result, multiple rate codes. Costs cannot be directly attributable to the rate codes being served. Some approach to allocate the cost is required.

Second, accounting for distribution costs as mass property is a common allowable practice across many electric utilities. Within each book entry, the detail addresses a general description of the property and quantity; the quantity placed in service by vintage year; the average cost; and the plant control account to which the costs are charged. However, as mass property, FERC Uniform System of Accounts standards allow these asset costs to be treated in bulk, removing methods to individually track attributes, such as customer specific or rate code specific detail.

A third concern is with line extension costs, expenses, and contributions being desired to be tracked and/or recorded by rate code and voltage. Beyond the fact that line extension costs are not retained by rate code, all Evergy jurisdictions are subject to Line Extension policies. The policies, detailed in the Company Rules and Regulations, set forth methods to identify terms for extension of facilities including methods to identify cost responsibility. In general, the Company provides a standard allowance or method to calculate the allowance and the customer causing the extension is responsible for paying the remainder of these extension costs. This policy ensures that customers causing the extension of facilities, pays an appropriate amount for those facilities. These customer contributions serve to offset the cost of extensions and are not considered in the Staff request. With this detail, the value of "line extension costs, expenses, and contributions by rate code and voltage" data would be questionable.

A fourth concern is with how Company labor and overheads are attributed to distribution facilities. When distribution facilities are installed, they are normally done so through distinct "jobs." The jobs are work orders within the Company work management systems. These jobs detail all of the construction components needed to achieve a certain project. These components will include all forms of facilities, primary, secondary, service, poles, devices, and equipment. Once the job is completed, labor costs and company overheads incorporated in the components are unitized, converted into a single value and recorded in the Company book and records. Additionally, accounting functions such as depreciation, Allowance for Funds Used During Construction ("AFUDC") and depreciation are applicable to plant costs and would be introduced through the accounting process. The inclusion of these costs may cause the costs studies to vary from the expected

- 1 values and make the results unreliable for rate setting purposes. Company witness Sean
- 2 Riley explores these facts in more detail within his testimony.
- 3 Q: Are these costs represented in the class cost of service studies currently prepared by
- 4 the Company?
- 5 A: Yes. Specific Plant Accounts and Expense Accounts identify costs related to distribution
- 6 facilities. The costs are not differentiated by voltage or rate code but are allocated between
- 7 the customer classes. The Company studies provide detailed information about the
- 8 following distribution costs.

	Distribution Plant				
Account	Description				
360.00	Land and Land Rights				
360.00	Depreciable Land Rights				
361.00	Structures and Improvements				
362.00	Station Equipment				
362.00	Station Equipment - Communications				
363.00	Battery Storage Equipment				
364.00	Poles, Towers and Fixtures				
365.00	00 Overhead Conductors and Devices				
366.00	Underground Conduit				
367.00	Underground Conductors and Devices				
368.00	Line Transformers				
369.00	Services				
370.00	Meters				
371.00	Installations on Customers' Premises				
372.00	Leased Property on Customers' Premises				
373.00	Street Lighting and Signal Systems				
374.00	Asset Retirement Costs for Distribution Plant				

Distribution Operations					
Account	Description				
580.00	Distribution Operation - Supr & Engineering				
581.00	Distribution Operation - Load Dispatching				
582.00	Distribution Operation - Station Expense				
583.00 Dist Operation Overhead Line Expense					
584.00 Dist Operation Underground Line Expense					
585.00 Distrb Oper Street Light & Signal Expense					
586.00	Distribution Operation Meter Expense				
587.00	Distrb Operation Customer Install Expense				
588.00	Dist Operation Miscl Distribution Expense				
589.00	589.00 Distribution Operations Rents				

	Distribution Maintenance				
Account	Description				
590.00	Distribution Maint-Suprv & Engineering				
591.00	Distribution Maintenance-Structures				
592.00 Distribution Maintenance-Station Equipment					
593.00 Distribution Maintenance-Overhead lines					
594.00 Distrib Maint-Maintenance Underground					
595.00	Distrib Maint-Maintenance Line Transformer				
596.00	Distrib Maint- Maintenance St Lights/Signal				
597.00	Distrib Maint-Maintenance of Meters				
598.00	Distrib Maint-Maint Miscl Distribution Plant				

A:

3 Q: Are these costs aligned with representative charges in the Company rate designs?

No. There is no single charge in the current rate design to recover cost associated with distribution facilities. These costs are currently spread across the bill elements of the rate designs, recovered at some level, through the Facilities Demand, Demand, and Energy charges of the non-residential rates. For residential rates, these costs are contained within the energy charges. Steps could be taken to better align costs with rate elements before seeking greater detail for distribution plant.

1	Q:	You describe that other parts of the data requested by Staff are to support new rate
2		design approaches. What is your opinion concerning this design?
3	A:	The Company is in the process of considering the design elements suggested by RAP and
4		endorsed by Staff. Specific to the application of this design to non-Residential customers,
5		the Company is actively discussing the design with Staff, representatives of Industrial
6		customers and other utilities. The Company has interest in exploring the designs further.
7	Q:	Given that you support further examination of the designs, do you support Staff's
8		requests for the data requested for rate design support?
9	A:	In part. I support that additional data will be needed to understand the potential value of
10		these rate designs, but we must remain practical in our execution of these requests. For
11		example, Staff seeks determinants to support reactive demand charges - an issue that may
12		or may not be of concern. As expressed throughout this testimony, Company resources and
13		available time are limited, so steps should be considered to prioritize needs and look for
14		alternative approaches that can leverage existing data to execute early studies and confirm
15		need.
16	Q:	You mentioned that these topics have been raised with other Missouri utilities. Are
17		you aware if the other Missouri utilities are providing this or similar data?
18	A:	We have been monitoring case activity in the state and note that Liberty Utilities has agreed
19		to provide some aspects of the data requested from Evergy, but at this point I am unaware

if the data has been provided.

For Ameren Missouri we note that many similar data retention requests occurred in their 2019 rate case, ER-2019-0355. Following testimony on the respective positions, Ameren Missouri addressed the issue in a negotiated settlement. ^{4,500}

Questions related to data and data retention continued into Ameren Missouri's next rate case, ER-2022-0337, ultimately going to hearing before the Commission. After cross examination on the topic, the Commission ordered,

So that sufficient information and data is available for analysis. The Commission finds it reasonable to direct Ameren Missouri to conduct and provide a study of the customer-specific infrastructure, by account, by rate schedule, by voltage, in its next general rate case. Additionally, the Commission finds it reasonable to direct Ameren Missouri to retain customer and rate schedule characteristics related to draws of reactive demand. Ameren Missouri is also directed to provide data concerning the level of rate base and expense associated with radial transmission facilities, including substation components by customer, for its next rate case. Staff expressed multiple times that it was unable to complete analysis necessary for an exploration of rate modernization because the information that Staff requested was unavailable. Staff also stated that it did not know "the universe" of what information exists. Staff supplied, at the hearing and in testimony, an extensive list of information that would assist its analysis in any rate modernization workshop. The Commission is reluctant to order Ameren Missouri to provide all the information that Staff requested, not because the Commission believes it unnecessary, but because the Commission does not know the full extent of information Ameren Missouri can provide, or the expense associated with collecting that information. The Commission finds it reasonable that Ameren Missouri provide more granular data for any rate modernization workshop, nonresidential working docket, and the Company's next rate case. Therefore, the Commission directs Ameren Missouri to provide the information Staff requested that it can provide at reasonable expense. Ameren Missouri shall also work with Staff to provide a better understanding of what information is available, so that Staff can better request information the Company can access. Finally, Staff has requested that the Commission direct Ameren Missouri to study potential rate structures and make available related determinants. The Commission does not find this request reasonable and will not order Ameren Missouri to conduct such a study.⁵

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18 19

20

21

22

23

24

25

26

27

28

29

30

31

32

33

34

35

⁴ See, p. 16, ER-2019-0355 Non-Unanimous Stipulation and Agreement, February 28, 2020.

⁵ See, Ameren Order ER-2022-0337 p. 48.

1		As of the date of this testimony, the nonresidential working docket is underway and
2		the Company has participated in the initial meeting.
3	Q:	The Company analysis shows that the effort to obtain much of the data would be
4		expensive to execute. Do you feel this is a prudent use of resources?
5	A:	No, data requests 1, 5 and 6 should be rejected by the Commission as impractical requests.
6		The remainder of the data requests are individually more reasonable, but collectively
7		significant. Data requests 2, 3, 4, 8, and 9 should only be provided with support from the
8		Commission to do so. Date request 7, a request detailing data retention timing, is already
9		being done by the Company, so there are no concerns with complying.
10		The Company must be good stewards with respect to cost. I believe it is important
11		to affirm that costs produce a benefit. The Company testimony is offered to provide the
12		Commission a full view of the cost.
13	Q:	Does that conclude your testimony?
14	A:	Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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

AFFIDAVIT OF BRADLEY D. LUTZ

STATE OF MISSOURI)	
)	SS
COUNTY OF JACKSON)	

Bradley D. Lutz, being first duly sworn on his oath, states:

- 1. My name is Bradley D. Lutz. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Director, Regulatory Affairs.
- 2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Evergy Missouri Metro and Evergy Missouri West consisting of twenty-four (24) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.
- 3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

Bradley D. Lutz

Subscribed and sworn before me this 1st day of November 2023.

Notary Public

My commission expires: 4/2u/w25

ANTHONY R, WESTENKIRCHNER
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 26, 2025
PLATTE COUNTY
COMMISSION #17279952

	DATA REQUEST ASSESSMENT SUMMARY					
DATA REQUEST #	<u>DATA REQUESTED</u>	AVAILABILITY ASSESSMENT	DELIVERABILITY ASSESSMENT	ESTIMATED COST TO PROVIDE	<u>NOTES</u>	
1	Prior to the next rate case, the Company will 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; extension costs, expenses, and contributions by rate code and voltage; and meter costs by voltage and rate code. If the required data is not readily available, the Commission should order Evergy to file an EO docket explaining why it cannot provide the data, and its individual estimate of the cost to provide each set of data described, for the further consideration of the parties and the Commission.	voltage class or rate code. In some instances current capital	Neither capital investments nor maintenance expenses are currently tracked by voltage class or rate code. In some instances current capital investments and expenses impact multiple primary voltages and rate codes.	\$80M - \$110M Design Phase \$5M - \$10M based on other enterprise efforts. Implementation Phase \$75-100M+ based on other enterprise efforts.	For distribution system costs that are attributable to specific individual customers and rate schedule/code would require an overhaul of the entire cost tracking and work management recording processes and systems. Individual systems are separate and have singular purposes with no natural alignment that would enable syncing and connection. As such, it would require consultation with system experts to not only configure the individual systems for linkage, but also assist with creating dynamic integrated processes to allow for the tracking and reporting of the data being requested. To support this request, Evergy would also likely need to hire on-going resources to sustain these processes to support an expectation of continual creation, tracking, storing, and reporting of this data.	
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 (this is only applicable if rate codes are not used to delineate the voltage at which customers are served)	AVAILABLE The data exists in MDM/CCB at individual customer and meter level.	PLAUSABLE DELIVERABILITY This still requires work to pull out, aggregate and validate based on specific requirements. See questions in notes.	~140 Hours/\$21K plus ongoing maintenance	Based on total number of active service agreements on each rate code.	
3	g ,	AVAILABLE The data exists in MDM/CCB at individual customer and meter level.	PLAUSABLE DELIVERABILITY This still requires work to pull out, aggregate and validate based on specific requirements. And will require components from both CCB/MDM to complete. See questions in notes.	~140 Hours/\$21K plus ongoing maintenance	Based on total number of active service agreements with meters that can collect interval data. i.e. AMI meters.	
4	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 (this is only applicable if rate codes are not used to delineate the voltage at which	Interval meter reading is stored at an individual meter level in MDM.	PLAUSABLE DELIVERABILITY Data recording processes currently exist to capture summarized hourly interval data by class. Such processes could be explored to be modified to capture individual rate codes. Currently processes, capture hourly data only.	~360 hours/\$54K plus ongoing maintenance	Based on hourly intervals.	
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	NOT AVAILABLE The data hub does not reflect any updates to interval usage information.	COMPLEX DELIVERABILITY Do not believe this to be a report ask, but believe this to be a process and system change for data hub.	\$3.75M - \$30M Design Phase \$1M - \$10M based on other enterprise efforts. Implementation Phase \$2.75-20M+ based on other enterprise efforts.	Evergy's MDM/CCB systems house corrections/updates of data in near real time. Data is posted to the Data Hub, the source for reporting, periodically. Modifications to align data within these systems would require extensive configuration and the utilization of MDM/CCB/Data Warehouse consultants to enable.	
6	should be provided or retained for those instances.	PARTIALLY AVAILABLE For the items in 1-5 above where the Company can provide the data, it will be retained for data availability.	COMPLEX DELIVERABILITY Ability to comply with an unknown future request of additional more granular data cannot be proactively ensured.	TBD No context for generating estimate.	See comments for Items #1 through #5.	
7	such data shall be retained in intervals of no less than one hour.	AVAILABLE Evergy retains interval data for individual customers as billing standards require in the CCB/MDM systems.	NOT APPLICABLE	NO ADDITIONAL COST	Evergy retains interval data for six years in MDM, and summarized usage is retained the data hub. Data hub aggregations began in January of 2020.	
8		AVAILABLE Evergy retains interval data for individual customers as billing standards require in the CCB/MDM systems.	NOT APPLICABLE	NO ADDITIONAL COST	Based on retaining individual hourly data. Evergy via a third party, offers a customer facing tool creating bill comparisons for residential customers (with qualifying data). The individual analysis for rate compares is dynamic and Evergy does not store or retain these individual comparisons.	

	DATA REQUEST ASSESSMENT SUMMARY						
DATA REQUEST #	<u>DATA REQUESTED</u>	AVAILABILITY ASSESSMENT	DELIVERABILITY ASSESSMENT	ESTIMATED COST TO PROVIDE	<u>NOTES</u>		
8	b. Retain coincident peak determinants for use in future rate proceedings.	data for individual customers as billing standards require in the	COMPLEX DELIVERABILITY If this requirement suggests providing a 15 minute view of system peak, this data cannot be delivered in the format	TBD No context for generating estimate.	Evergy can provide hourly data by rate class for all hours of the day for every day of the year as is currently provided in rate cases. As noted in item 4, an aggregated view of hourly data by rate code can be pursued. 15 minute interval data is not currently stored in the Data Hub and therefore cannot be aggregated as described.		
8	c. 1) the information described in part 1;	are currently tracked by voltage class or rate	suggested. COMPLEX DELIVERABILITY Neither capital investments nor maintenance expenses are currently tracked by voltage class or rate code. In some instances current capital investments and expenses impact multiple primary voltages and rate codes.	See Item #1	See Item #1		
8	c. 2) a minimum of 12 months of the data described in parts 2-5;	SEE INDIVIDUAL ITEMS ABOVE	SEE INDIVIDUAL ITEMS ABOVE	~140 hours/\$20K plus ongoing maintenance			
8	c. 3) 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);	AVAILABLE The data exists in MDM/CCB at individual customer and meter level.	PLAUSABLE DELIVERABILITY Configuration would be needed to facilitate/extract data.	~260 hours/\$42K plus ongoing maintenance	Based on delivery of hourly data for sample of 100 customers.		
8	c. 4) 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).	AVAILABLE The data exists in MDM/CCB at individual customer and meter level.	PLAUSABLE DELIVERABILITY Configuration would be needed to facilitate/extract data.	~250 hours/\$40K plus ongoing maintenance	Based on delivery of hourly data for sample of 100 customers.		
8	d. For purposes of general rate proceedings, Evergy shall provide all data described above for a period of not less than 36 months, except that Staff does not request individual customer data for 36 months except as described in part 8.c.3.	SEE INDIVIDUAL ITEMS ABOVE	SEE INDIVIDUAL ITEMS ABOVE	SEE INDIVIDUAL ITEMS ABOVE	The creation of a sustainable dynamic process that captures all of the data above, that retroactively corrects/modifies based on downstream/future changes, and the incorporation of individual capture and manual intervention to facilitate sampling at any/all intervals based on later clarification for a 36 month period is likely not possible without extensive system/process overhaul and configuration as detailed in the individual items above.		
9	Staff recommends that EMM and EMW be ordered to develop the determinants for assessment of an on-peak demand charge to replace the current monthly billing demand charge, and for potential implementation for customers not currently subject to a demand charge. At this time, Staff recommends that in summer months the period be noon — 10 pm, and during non-summer months the period be 6 am — 10 pm, but Staff welcomes the input of other parties to refine this time periods. Staff does not recommend that weekends and holidays be excluded. Second, Staff recommends the EMM and EMW begin to retain and study data related to the reactive demand requirements of each rate code, and sample customers within each rate code. While in recent history reactive demand has not been a determinant in CCOS studies or a rate element for many customers, emerging system conditions associated with changes in regional generation fleets may occasion further study of reactive demand requirements.	PARTIALLY AVAILABLE Data is being retained to develop an on peak charge. Determinants are being retained for rates where reactive demand is a component. Expanded determinants dependent on study design.	PLAUSABLE DELIVERABILITY Configuration would be needed to facilitate/extract data to develop an on peak charge. Reactive demand data is currently provided as part of rate design process. Expanded reporting dependent on study design.	TBD No context for generating estimate.	Currently, MDM systems collect meter interval data for all hours of the day, 365 days of the year for customers with AMI meters. Configuration would be needed to create reporting for the collection of hourly kw during any peak period identified. Evergy does not have a study design in place to inform the portion of the is data request related to reactive demand.		

Exhibit No.:

Issue: Rate design studies and rate case

commitments, Rate Modernization

Witness: Julie Dragoo Type of Exhibit: Direct Testimony

Sponsoring Party: Evergy Missouri Metro and Evergy

Missouri West

Case No.: EO-2024-0002

Date Testimony Prepared: November 1, 2023

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: EO-2024-0002

DIRECT TESTIMONY

OF

JULIE DRAGOO

ON BEHALF OF

EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST

Kansas City, Missouri November 2023

TABLE OF CONTENTS

I.	SYSTEMS OVERVIEW	. 3
II.	DATA AVAILABILITY & RETENTION SUMMARY	. 7

DIRECT TESTIMONY

OF

Julie Dragoo

Case No. EO-2024-0002

1	Q:	Please state your name and business address.
2	A:	My name is Julie Dragoo. My business address is 1200 Main, Kansas City, Missouri
3		64105.
4	Q:	By whom and in what capacity are you employed?
5	A:	I am employed by Evergy Metro, Inc. I serve as Senior Director, Customer Strategy &
6		Support for Evergy Metro, Inc. d/b/a as Evergy Missouri Metro ("Evergy Missouri
7		Metro"), Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri
8		West"), Evergy Metro, Inc. d/b/a Evergy Kansas Metro ("Evergy Kansas Metro"), and
9		Evergy Kansas Central, Inc. and Evergy South, Inc., collectively d/b/a as Evergy Kansas
10		Central ("Evergy Kansas Central") the operating utilities of Evergy, Inc.
11	Q:	On whose behalf are you testifying?
12	A :	I am testifying on behalf of Evergy Missouri Metro and Evergy Missouri West
13		(collectively, the "Company" or "Evergy").
14	Q:	What are your responsibilities?
15	A:	My current responsibilities include leading the system support teams for our customer
16		information systems as well as other customer facing interfaces. I lead the project delivery
17		team for customer focused technology projects as well as the customer data analytics team.
18		My organization leads the prioritization of technology projects for the customer division
19		and drives those projects to execution.

1	0:	Please describe	vour education.	experience and	employment history.
•	\boldsymbol{x} .	I ICUSC GESCIINE	, our cuucution,	onperionee and	cimple juicité mister j

- 2 I hold an Executive Masters of Business Administration from University of Missouri -A: 3 Kansas City and a Bachelor of Science in Business degree in Finance from Emporia State 4 University. I have been with Evergy and predecessor companies since October 2000 and 5 have served in many capacities in the customer service organization since 2003. I've led 6 large customer projects, managed Contact Center Operations, as well as Metering and Field 7 Service and Revenue Management teams. I established the current system support team 8 for customer systems as well as the project delivery team for this organization leading to 9 my current role as Senior Director – Customer Strategy & Support.
- 10 Q: Have you previously testified in a proceeding before the Missouri Public Service

 11 Commission ("Commission" or "MPSC")?
- 12 A: Yes.

- 13 Q: What is the purpose of your testimony?
- 14 A: I will address the following topics in my testimony:
 - I. Systems Overview I will explain the Company systems and the technical environment in which these systems reside within the Company.
- II. Data Availability & Retention Summary Support I will provide support
 for the technical details and cost estimates provided in the testimony of
 Company witness Bradley Lutz.

I. SYSTEMS OVERVIEW

A:

A:

2	Q:	Please describe your understanding of the Staff's request and the systems impacted
3		by the data requested by Staff.

Staff has requested a series of data from the Company to support changes to class cost of service study methodologies and rate design changes. Staff is asking for a variety of data that is housed across multiple independent systems.

On its face, the requested data might seem straight-forward, however, the data relationships, time periods, or data intervals combined with the complexity of our systems, business processes, procedures, and accounting regulations makes much of this a challenging request to meet. If the Commission supports the requests from Staff, providing the data will require significant project-level work to enhance many of the core/enterprise systems that run the daily business. These systems include, but are not limited to, Customer Care & Billing ("CCB"), Meter Data Management ("MDM"), Asset and Work Management Systems (Maximo), Accounting and Asset accounting systems (Peoplesoft, Powerplan), and other support systems including the data warehouse that is used for analysis on data from these systems. It is important the Commission understand these systems to better appreciate the complexities and costs related to the Staff data request.

Q: Please describe the primary systems used at Evergy and the purpose of each of these systems.

CCB/MDM - These combined systems handle every aspect of the utility customers' information and contain the objects that form the core of the systems: Person, Account, Premise, Service Agreement and Service Point. These objects hold information about our customers including dates of service connections, meter reads, rates, billing, and more

while also managing functions such as payment processing, collections, field service and meter/device management. These systems collectively provide functionality for handling large volumes of meter data to enable accuracy of customer billing. The key users of these systems include Contact Center, Billing and Revenue Management, Metering and Field Service, Distribution Management, Accounting, Tax and IT/System Support teams.

The MDM system collects and stores metering and device information such as interval reads, where the meter is installed, start and end dates of service for customers, etc. The CCB system is the customer account and billing system and holds a wide variety of detail for customers including personal account details, customer program participation information. rate details and billing and account history information. While these are two separate systems, they are integrated and work together to create the customer bill. From an industry perspective, while meters may track usage, that usage is not tied to a particular rate until a person/customer is associated to that premise/meter and assigned a rate code for that particular service location. Associating data in this way is not unique, but is the approach and function of the software used by the Company.

Work and Asset Management Systems

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

Evergy currently uses a variety of work and asset management systems across its transmission and distribution business units. This includes the following systems: Cascade, STORMS, Maximo 7.6, and Maximo Anywhere. Evergy is currently engaged in a multi-year effort to upgrade and combine these multiple systems into a single work and asset management system, Maximo 8. Maximo 8 will be used in the Substation, Transmission and Distribution areas of the business.

The main functions of Maximo 8 are to allow creation and tracking of work orders through the work order life cycle and track/maintain a historical record of the work done on key system assets throughout the asset's lifecycle. Users of these systems include engineers, designers, asset and data analysts, construction and scheduling team members from our Distribution, Substation, Transmission, and Planning Departments.

Our Work and Asset Management Systems interface with our Geographic Information System ("GIS"), material inventory system, design softwares, CCB, PowerPlan, and scheduling softwares. While many systems interface with our work and asset management systems, there is currently no direct integration between work orders or work done on assets and our customer accounts. This is due to the fact that many assets are part of the infrastructure serving a wide variety of customers across many rates and even voltage classes. For example, a single pole asset could support a transmission circuit, a distribution circuit, and secondary conductor, feeding multiple residential, commercial, and industrial customers.

The work management system creates work orders that map to Evergy's financial accounting systems and track costs (both capital investments and O&M expenses) based on the hierarchy established within those accounting systems, however, our work and asset management systems are not the system of record for system configuration, asset attributes, or cost and time reporting.

PeopleSoft/General Ledger Accounting System

The PeopleSoft general ledger ("GL") is the system used for keeping a record of the Company's financial transactions. The GL uses a set of numbered accounts to record asset, liability, equity, revenue or expense transactions. The information in the GL is used to

create financial statements (i.e., balance sheet, income statement, statement of cash flows and statement of equity).

The GL is a summary of financial transactions that come from multiple sources.

Those multiple sources include manual journal entries directly entered into the GL or journal entries from other systems that store more detailed transaction information.

Transactions in the GL are not recorded by customer nor rate schedule.

PowerPlan/Asset Accounting Systems

Q:

A:

The PowerPlan system handles the capital and fixed asset related transactions. The system handles capital through the life cycle of tracking construction work in progress at a work order level which becomes a fixed asset at the Federal Energy Regulatory Commission plant account level. The system depreciates and amortizes the fixed assets based on approved depreciable lives. The Maximo work management system integrates the work order information to PowerPlan to allow the tracking of that work order into the financial systems. The system is used by accounting for calculating Allowance for Funds Used During Construction ("AFUDC"), depreciation, and Asset Retirement Obligations ("ARO"). It is used by various project managers to see the accumulation of charges by work order as well as regulatory analysts who use the system as a reporting tool for assets and accumulated depreciation.

Are these systems unique to Evergy or are these systems used by other utilities to manage data and work?

These systems are used widely across the industry. Evergy is not unique in the way we use and integrate these types of systems. In fact, Evergy does industry benchmarking and

1	discusses lessons lea	rned with other utilities when embarking on large technology projects
2	with these systems.	Industry witness Sean Riley will support this view in his testimony.

Please describe how these systems are interconnected.

Q:

A:

O:

A:

The level of interconnection and the data retained in each application is specific and unique to the business processes and procedures managed by that system. While some may interface and share a few pieces of the same data (billing summary data shared with Peoplesoft Financials, CCB work requests sent to Maximo, etc.), there is not a common data "key" that allows us to link all of the systems together. As described above, from an industry best practices perspective, asset management systems do not contain comprehensive cost or customer information; asset accounting systems do not tie to meters or rate codes; and customer billing has no connection to poles and wires. These connections are not necessary for the purposes of billing and servicing our customers, delivering safe and reliable power, or properly accounting for our assets and revenue.

II. DATA AVAILABILITY & RETENTION SUMMARY

Are the systems described above inherently designed to support data analysis? If not, what steps are needed to extract data and create data sets for analysis?

No, the core applications are meant to serve the purpose as described for each unique system. To analyze the data of these disparate systems, Evergy has created multiple data warehouses to store, aggregate or summarize data for further analysis. As described in Bradley Lutz's testimony in the summary table, the data requested by Staff that can be produced by Evergy will generally be pulled from these warehouses, collectively referred to as the Data Hub.

The amount of data flowing through the business systems and Data Hub is 2 enormous. It takes different teams to ensure the maintenance of the systems and data 3 warehouse. However, when it comes to using the data for decision making and running 4 the business, each business area has a team of people who take ownership of the unique 5 data sets. These teams maintain the quality of the data, create data definitions, and maintain 6 understanding of how the data can be used for each business function. Generally, when 7 data is to be extracted from the Data Hub, detailed requirements and specifications are used 8 to identify data sources within the repository and determine if there are appropriate links 9 within the data to allow combination. If the data and the relationships exist, requirements 10 are confirmed and design occurs. Queries are then developed, tested and executed, thereby, producing the requested output. 12 Why is it important to take these additional steps beyond the plain export of the data? Q: 13 A: Many of these systems do not provide delivered reports and analytics as part of the base 14 system, or at least not to the level needed by Evergy. Therefore, much of the work to build 15 such views requires the use of the Data Hub and our IT partners. In most cases, the business 16 teams require summarized views of data for decision making or analysis, so it is critical 17 that processes are followed to ensure the data is accurate. This involves creating mini-18 projects to create the data points using defined business logic and rules. These projects 19 include all the phases of requirements confirmation, design, development and testing to 20 ensure data quality. In addition, Evergy must consider how business teams' access and use this data. Data security is key in every aspect, but especially when working with customer 22 information. The more the Data Hub can aggregate data and anonymize the customer data

the better. Further, the Company expects that Staff would plan to use this data to support

1

11

21

1		ratemaking and other recommendations as part of future rate cases. Since the data will be
2		used in this way, it is important that the Company be certain the data is retained and there
3		is some method to reconcile with other data used in that rate case. For example, if Staff
4		relies on energy consumption data extracted from Data Hub, both Staff and the Company
5		would want to ensure the data could be tied back to the consumption supporting the rate
6		case. This would require the Company to maintain large repositories solely to retain data
7		provided to Staff. In addition, the more data we store and keep separate, the more day-to-
8		day work we put on Evergy and eventually more cost to our customers.
9	Q:	Are you familiar with the Data Request Summary referenced in the testimony of
10		Bradley Lutz?
11	A:	Yes.
12	Q:	Did the Company examine the Data Hub for the data requested by Staff?
13	A:	Yes. The Company's assumptions and results were included in the summary table
14		provided as Confidential Exhibit BDL-1 to the testimony of Bradley Lutz. In summary,
15		much of the data requested exists, however there are concerns around how to produce the
16		data, defining how to store and share the data, and establishing business processes to ensure
17		the data remains consistent and useful to Staff. These efforts can be considerable and were
18		incorporated in the cost estimates provided.
19	Q:	In your opinion, are the details and costs offered in that Summary accurate to the
20		best of your knowledge?
21	A:	Yes. Where estimates were provided the team thought through the resources necessary to
22		define and confirm the requirements, design and develop the reports, validate with internal

business owners and the actual processing time to pull data and prepare for delivery. As

1		noted in the summary, some requests cannot be met without significant changes to
2		underlying processes and enhancing existing systems, and at this point in time there is no
3		specific estimate available other than the ranges offered.
4	Q:	The summary identifies the "availability" and the "deliverability" of the data as
5		separate assessments. Why is this needed?
6	A:	In review of the data requested it became clear to the Evergy team that to fully express the
7		evaluation of the data, two attributes were needed. "Availability" was used to express the
8		Company assessment of data being part of our existing repositories. "Deliverability" was
9		used to express the Company's ability to extract, format, and provide the data as requested.
10		The combination of these attributes identified the collective work expected.
11	Q:	Can you offer any additional context to the reason ranges were used to express the
12		expected cost to produce the requested data?
13	A:	Yes. From an industry perspective, estimating large technology efforts is a challenge even
14		with known scope. Trying to estimate efforts to complete reporting asks, or potentially
15		large overhauls of our enterprise systems is even more difficult when scope is vague or
16		worse, undefined. Any technology project requires a review of effort to understand what
17		resources internally and externally and/or software and hardware will be necessary to
18		complete the job.
19		Without fully detailed scope, technology efforts are "shirt sized" and given a range
20		of $S-XXL$. The requests from Staff range from items we can build with data that exists,
21		to trying to report on data that does not exist, the range was very wide for the estimate.
22		Evergy recognizes some of the requests will require the use of outside resources including
23		our technology partners and system integrators, to assess gaps and define processes to

create the data required to support these requests. These resources range in cost from \$150-\$500+/hour. From recent experience, Evergy knows the costs associated with just the design phase of these large technology projects (the effort to align on scope and confirm the solution) can be anywhere from \$5M-\$10M. In addition, data request 1 with its request of data not available, the effort to create the data in question would require extensive work on the described systems and business processes. Based on past projects to inform estimates for those system upgrades, the cost to achieve could be well over \$100 million dollars.

0:

A:

In its normal course of business, does the Company produce requirements and specifications to produce cost estimates for work?

Absolutely. Project requests typically start with shirt sizing, then prioritization, and then detailed requirement definition. The shirt-sizing method described above plays into the sizing and estimates are refined once requirements are confirmed and Evergy understands what third party resources may be required for execution. Evergy has experience defining specific business and system requirements as well as securing the necessary internal and external resources for many enterprise projects. We often work with our business partners and system integrators to ensure a more comprehensive view of the project requirements. In fact, the practice of creating detailed business and system requirements allows for more accurate estimates, and may even reduce project costs overall when scope is well-defined and the complexity of the solution is known and accounted for up front. Rarely do cost estimates go down as business requirements and solution design begin to take shape. While estimating effort for projects is a normal practice at Evergy, the difficulty in defining estimates around the requests from Staff is not only the unprecedented nature of some of

1	the requests, but the realization that even if the data could be created with change to
2	processes, procedures and systems; it would not meet the historical data requirements noted
3	in the request. Changes made now will collect data going forward.

4 Q: Are there other cost considerations that the Company experiences when working within these computer systems?

- A: Of course. Costs such as project management, quality assurance, testing, deployments to production, additional software and hardware equipment needed to support growing data sets, and change management, including training for employees, are all costs incurred with implementing new processes and or systems. In addition, there are costs associated with the ongoing operations and maintenance of the systems plus the staffing of support teams and operational teams to manage day-to-day processes and ongoing reporting requests. In many cases, technology implementations seek to enhance customer experience or improve productivity to drive cost out of the business. On the surface, the requests examined in this docket appear to create more cost to the Company and in turn to the customer. To completely re-engineer accounting practices, business practices, and systems for Missouri in what would be considered enterprise systems will be significantly complex costing millions of dollars, taking multiple years, and negatively impacting future projects.
- Q: Looking to the specific data requests (see Bradley Lutz direct testimony, pp. 3-5) are there any of concern you would like to address?
- A: Yes, in my opinion data requests 1, 5 and 8 are particularly difficult for the Company to address. Specifically for data request 1, as noted in Bradley Lutz's direct testimony, data does not exist in these combinations within Evergy systems to support the data request. I'd like to reiterate that while cost information exists, it is not tied to customer accounts or

rates. The process of installing distribution infrastructure is distinct from the process of receiving energy and often involves different individuals. It is common that construction activity, resulting in new infrastructure, is performed by builders, developer, engineering companies and others and then turned over to customers who then receive the energy service. During the construction process, service may be provided to the premise on a different rate schedule than used by the customer occupying the premise. In addition, the Company follows accounting rules that direct the way costs are recorded. Plant in-service costs are not recorded by customer nor rate schedules and components of the distribution system are recorded as mass property. For example, the group of poles or wire going into service in a particular month are summed together to record a total quantity and total amount and will represent many customers at different rate schedules.

As an additional point to data request 1, the amount of business process changes and change to how employees will manage their day-to-day work is really difficult to describe in my testimony. It is not an easy task to change processes, but it is even harder to ensure they are well controlled. I mentioned previously that teams will have to process details at an entirely new level, thus creating more work, adding more staff and potentially additional human error to solve for a request for which the Company cannot grasp the customer benefit. The additional cost to change processes and systems, integrate data and develop data views, hire new teams of people to manage and somehow have the right support system in place to administer is not just a one-time cost, but an ongoing cost that cannot be well defined at this time.

Data request 5 is an issue, not because the source systems do not have the updated and billed data information, but because the Data Hub was not built to be a replica of

Evergy's business source systems. As noted previously, Data Hub is the source for the majority of the aggregation requests. To try and recreate data in multiple sources and ensure they stay in sync would require extensive modifications to the Data Hub integrations and processes, new configurations in our metering and billing systems and increased storage capacity and processing power.

As for the requests in data request 8, the Company's concerns vary depending on the specific request. As it relates to "retaining" data in 8(a) and (b), I believe Evergy has shown the data is retained in the appropriate source system. It is the Staff's suggestion that the data may need to be provided vs. retained that causes Evergy concern. As pointed out in the table, if hourly data is acceptable for data request 8(b), the data could be made available through the evaluation of data request 4.

For data request 8.c.1. please see the details above on why data request 1 is not possible for Evergy. As for data request 8.c.2., Evergy can give a 12-month view for data requests 2 through 4. The Company does not believe data request 5 to be a request for data, but rather a process for the Company to follow and those concerns are addressed above. The sampling requests in data request 8.c.3 and 8.c.4 can be accommodated in small sample sizes and with the timelines provide in the table in Mr. Lutz's testimony. None of these data requests can be processed immediately or come without cost to the Company.

As for data request 8.d., Evergy cannot commit to having 36-months of details retroactively for all the data requests. For clarity, where data does not exist today, Evergy cannot be expected to produce a historical view of such data. Where data is available and deliverable, Evergy will do it's best to comply with reasonable historical requests.

Q: If the Commission orders the Company to execute on these data requests, how will

the work described be accomplished?

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

A:

As mentioned above in my testimony, the estimates given for the work, particularly for data request 1 are at a "shirt-size" level. To begin, the project(s) will need to be evaluated across the current enterprise technology roadmap for impact to other efforts and resources. The conflict created with work in progress on these systems will need evaluated across workgroups and should include a conversation with Staff and Commission as to the ranking of this effort amongst existing work, other regulatory and data asks, and customer benefitting technology enhancement work. If it is determined the data request work is appropriate, one of the first steps for Evergy would be to work with Staff and our thirdparty integrators to fully define requirements. Teams of product experts would conduct a review of current data and define the gaps, including defining new business processes and procedures that allow for the collection of the data. Recognizing this impacts our core enterprise systems, work would likely need to be done in phases and as described above will probably take place over the course of multiple years. In addition, knowing the data requests will impact the Company's accounting practices, a legal and compliance analysis would also be needed. Even the exercise of evaluating the effort will be a burden on Evergy teams and will most necessarily require contractors and consultants. While the comments above focus on changes and integrations of systems, I would be remiss if I did not reiterate another previous point; the amount of change management, training and people readiness involved in providing the data requested by Staff is an effort of this magnitude will be monumental. This would be a transformational project and contemplating this undertaking,

- with an already full slate of projects over the next several years, and would increase the
 implementation risk profile exponentially.
- 3 Q: What is your recommendation concerning the Staff data requests?
- 4 A: I recommend the Commission reject as unreasonable data requests 1, 5 and 6 and to assess 5 the data request 8 as separate requests and to reject as unreasonable the subparts to data 6 request 8 that are impacted by data request 1 and 5. For the other data requests, I believe 7 it is important the Commission understand Evergy's position with the data requests (as 8 defined in assumptions and effort in the data table) and acknowledge the level of cost 9 associated with providing new and different views of data. The Company is willing to work 10 with Staff to further develop requirements that would refine the cost estimates and timing 11 for the other data requests. Part of those conversations would be to align expectations on 12 the format and frequency of sharing the data.
- 13 Q: Does that conclude your testimony?
- 14 A: Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Requests from Evergy Missouri Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Customer Data Account Data Production)) No. EO-2024-0002)
AFFIDAVIT OF	JULIE DRAGOO
STATE OF MISSOURI)) ss	
COUNTY OF JACKSON)	
Julie Dragoo, being first duly sworn on h	nis oath, states:
1. My name is Julie Dragoo. I wo	rk in Kansas City, Missouri, and I am employed
by Evergy Metro, Inc. as Senior Director, Custo	mer Strategy & Support.
2. Attached hereto and made a part	t hereof for all purposes is my Direct Testimony
on behalf of Evergy Missouri Metro and Evergy	y Missouri West consisting of sixteen (16) pages,
having been prepared in written form for intr	roduction into evidence in the above-captioned
docket.	
3. I have knowledge of the matters	set forth therein. I hereby swear and affirm that
my answers contained in the attached testimony	y to the questions therein propounded, including
any attachments thereto, are true and accurate	to the best of my knowledge, information and
belief.	Atuahacro
Jul	ie Dragoo
Subscribed and sworn before me this 1st day of 1	November 2023.

My commission expires:

H 2u 2025

ANTHONY R. WESTENKIRCHNER NOTARY PUBLIC - NOTARY SEAL STATE OF MISSOURI MY COMMISSION EXPIRES APRIL 26, 2025
PLATTE COUNTY COMMISSION #17279855

ACT ACC 656

Page 19 of 19

Page 240

BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

TRANSCRIPT OF PROCEEDINGS

EVIDENTIARY HEARING

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

Tuesday, January 31, 2024 9:00 a.m. - 4:59 p.m.

Governor Office Building 200 Madison Street Jefferson City, MO 65101 and WebEx

VOLUME 4
Page 240 - 482

CHARLES HATCHER, Presiding
Senior Regulatory Law Judge

SCOTT T. RUPP, Chairman MAIDA J. COLEMAN, JASON R. HOLSMAN, GLEN KOLKMEYER, KAYLA HAHN,

Commissioners

Stenographically Reported By:
Beverly Jean Bentch, RPR, CCR #640

Job No. 159023

	Evidentiary Hearing	January 51, 2024
1	APPEARANCES	Page 241
2	For Evergy Missouri West and Evergy Missouri Metro:	
3		
4	JAMES FISCHER Attorney at Law	
5	2081 Honeysuckle Lane Jefferson City, MO 65109	
6	jfischerpc@aol.com	
7	For Public Service Commission Staff:	
8	CAROLYN KERR, Senior Staff Attorney WHITNEY SCURLOCK, Chief Deputy Counsel Governor Office Building	
9	Suite 800 200 Madison Street	
10	P.O. Box 360 Jefferson City, MO 65102-0360	
11	carolyn.kerr@psc.mo.gov whitney.scurlock@psc.mo.gov	
12	For Office of the General Counsel:	
13		
14	JOHN CLIZER, Senior Counsel Office of the Public Counsel	
15	200 Madison Street, Suite 650 P.O. Box 2230 Jefferson City, MO 65102	
16	john.clizer@opc.mo.gov	
17		
18		
19		
20		
21		
22		
23		
24		
25		

1	The following proceedings began at 9:00 a.m.:
2	JUDGE HATCHER: Let's go on the record. Today
3	is day two of the evidentiary hearing in File No.
4	EO-2024-0002. Again, my name is Judge Charles Hatcher.
5	I will be presiding over this evidentiary hearing. We
6	have Staff witnesses coming up. And do we have any other
7	business that we want to discuss before we get started?
8	MR. FISCHER: Judge, I just want to put on the
9	record we did file an errata yesterday related to Brad
10	Lutz's testimony in EFIS. I don't know if you want to
11	take that up. I don't think we've actually had his
12	testimony admitted, but at some point we'd like to have
13	that done.
14	JUDGE HATCHER: I'm going to put a note on my
15	desk to ask at the end of the hearing today, because I
16	happened to overhear that not every counsel had checked
17	EFIS this morning so give everybody a little bit of time.
18	I saw it. It looks great. And at that point I'll ask
19	this afternoon if we get no objections then we move
20	forward. We might feel that out but I don't expect any.
21	MR. FISCHER: Thank you.
22	JUDGE HATCHER: Okay. Ms. Kerr, the floor is
23	yours. Please call your first witness.
24	MS. KERR: Thank you. I'll call Sarah Lange.

JUDGE HATCHER:

Please raise your right hand.

Page 243 1 Do you solemnly swear or affirm that you will tell the 2 whole truth during your testimony? 3 THE WITNESS: I do. 4 JUDGE HATCHER: Thank you. Please have a seat. 5 Your witness. 6 Thank you. Good morning. MS. KERR: 7 THE WITNESS: Good morning. 8 SARAH LANGE, 9 having been first duly sworn, was examined and testified 10 as follows: 11 DIRECT EXAMINATION 12 BY MS. KERR: 13 Can you please state your name for the record Ο. 14 and spell your last name, please? 15 Α. Sarah L.K. Lange, L-a-n-g-e. 16 By whom are you employed and what's your Q. 17 position? 18 Α. I am -- I believe my position title is 19 currently economist for the Missouri PSC Staff in the 20 Tariff Rate Design Division. 21 Have you prepared and filed testimony in this 0. 2.2 proceeding, specifically rebuttal testimony on December 23 15, 2023, which has been marked, premarked I believe it's 24 Exhibit 218 and there's confidential 218C?

JUDGE HATCHER: Her rebuttal testimony is

1 marked as 201.

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

MS. KERR: I'm sorry. It's 201.

JUDGE HATCHER: Thank you. Sorry to interrupt.

MS. KERR: 201 and 201C.

THE WITNESS: I have, although similar to the discussion around Dr. Marke's testimony yesterday, my understanding is that that confidential designation is no longer required on the confidential version.

BY MS. KERR:

- Q. Okay. And do you have any changes or corrections to make to any of those documents?
- A. I do. On page 5 at line 26, I referred to the importance of the customer usage information data for the fuel adjustment cost based factor. And so page 5, line 26, the word cost should be replaced with the word clause.
- Q. And other than that change, are there any other changes that you need to make to the document?
 - A. Not that I'm aware of.
- Q. And with that change, if I asked you the same questions, would your answers be the same or substantially the same as they --
- A. Generally there were items that Evergy raised in surrebuttal that were not addressed that if you asked me those same questions today I would need to address

- those items raised in surrebuttal; but as of the time I filed my rebuttal, that is accurate.
- Q. And those same answers are true and correct to the best of your knowledge and belief?
 - A. Yes, with that caveat.

MS. KERR: So I offer Exhibit -- I guess we're just doing one exhibit, 201, into evidence and tender the witness.

JUDGE HATCHER: I think so. Mr. Clizer. I think we're going to do just one. I need your attention because I'm going to circle back and punt Dr. Marke's testimony back to you. Would you please send me the cleaned up?

MR. CLIZER: I thought that was coming.

JUDGE HATCHER: Yes, I was all caught up in volunteering yesterday and trying to be helpful and realize this is going to be a lot easier for you. I would like to do the same with Ms. Lange's testimony and I want to make sure I get a nod from the Company. These, Dr. Marke's and Ms. Lange's testimony, will not include a confidential version and will include the numbers from BDL-1, right?

MR. FISCHER: It would just be the same testimony without the confidential designation around the numbers. I have no objection to that.

I'm not

1	JUDGE HATCHER: Okay. I just want to make sure
2	we're all talking about the same thing. Awesome. Okay.
3	We've done yours. Just email it to me. Let's do yours.
4	You've heard the motion for Exhibit 201, one copy, public
5	copy being admitted onto the record. Are there any
6	objections? Hearing none. So admitted. Just email me
7	that in the next week or so. Thank you.
8	(STAFF'S EXHIBIT 201 WAS RECEIVED INTO EVIDENCE
9	AND MADE A PART OF THIS RECORD.)
LO	JUDGE HATCHER: Your witness. Thank you. And
L1	I will state for the record we have the attendance of
L2	Commissioners this morning. We have Chair Rupp, we have
L3	Commissioner Holsman and Commissioner Hahn and we have
L4	Commissioner Kolkmeyer. Thank you. I do expect
L5	Commissioner Coleman will be joining us in a little bit.
L6	I apologize, Ms. Kerr. Please go ahead.
L7	MS. KERR: I tender the witness for cross.
L8	JUDGE HATCHER: Let me check my magic cheat
L9	sheet. That goes to cross-examination for Mr. Clizer.
20	MR. CLIZER: Permission to approach the
21	witness.
22	JUDGE HATCHER: Yes.
23	MR. CLIZER: Then Your Honor, like I said, as a
24	quick explanation this should be a copy of Schedule BDL-1

that is attached to the testimony of Brad Lutz.

asking this to be marked as an exhibit because it will be entered into the record with his testimony. I provided it now for ease of reference and to make sure everyone had a color copy. Wanted to make sure that was clear what I'm doing.

Good morning, Ms. Lange.

THE WITNESS: Good morning.

CROSS-EXAMINATION

BY MR. CLIZER:

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

- Q. Would you happen to have a copy of Brad Lutz Schedule 1 in front of you?
- A. I will accept your assertion this is an accurate representation and yes, I conveniently do.
- Q. There we go. I'd like to walk through this with you to kind of get a better understanding exactly what Staff's position is on each of the items. Based on the RLJ's comment at the beginning of the case, we're not going to refer to these as data requests. I think we'll refer to them as either stipulation items or data sets, whichever you feel more comfortable with, just so that we adhere to that comment by the Judge.

So let's get right into it. That first data set No. 1, that is obviously the biggest dollar item according to what the Company says it would cost. You would agree with me on that, right?

- A. I agree that's the biggest number on this page.
- Q. So that's a good place to start besides being No. 1. Now, to begin with, you asked for quite a few different things in this data set, right?
 - A. Yes.

- Q. And are each and every one of those things equally important or do you believe each and every one of those is equally important?
- A. Well, if you're the customer who's paying an extra couple grand a year, they're important to you. But these are items that relate to the specific price distinctions in Evergy's existing tariff sheets. So to say one is more important than the other, I can't say that, but definitely if I was going to do the sort of study that we envisioned when we entered into the stipulation, they're ones that I would prioritize.
- Q. Thank you. Actually let me back up and let's clarify this. I think it was said yesterday, and I want to make sure that you agree, that these items in data set 1 are primarily focused on cost allocation. Is that an accurate statement?
- A. Well, I mean, there's cost allocation but there's also rate design. Frankly I view these as more related to rate design than cost allocation, but I know that not everybody kind of observes those distinctions.

- Q. Now, Staff has been doing rate design and cost allocation, since we're talking about both, in cases for quite a long time. Would you agree? Let me specify, for as long as you've been employed?
- A. Well, there was a phase from I believe 2005 to 2011-ish where by stipulation Staff did not -- no party did CCOS studies or rate modifications in Evergy rate cases and that was pursuant to their, oh, gosh, what was it called again, the Iatan rate plan. It had a longer name than that. But with that exception for Evergy, we have tried to do a CCOS in every case. We can't always do that. You have to do rate design to one extent or another in every rate case because that's where compliance tariffs come from.
- Q. Really quick just for the sake of our court reporter, you might have said it earlier, but CCOS is?
 - A. Class cost of service.
 - Q. Thank you.

- A. And typically we leave out the word study but class cost of service study.
- Q. And Staff believes that the information it's requesting here is going to be necessary for class cost of service studies moving forward, correct, for Evergy?
- A. Well, Staff believes this information is necessary to ensure that the Commission is approving

- rates that are just and reasonable and that are not unjustly discriminatory or unduly preferential. Whether a literal study is done in every case versus checks of existing rate elements or other approaches is done can vary case to case. Data availability, Staff time, those sorts of things all play into whether a full blown CCOS study would be done in a given case.
- Q. I guess what I'm trying to get at is the idea that there appears to be a difference of opinion between Staff and the Company about what information is necessary based on what's been done in the past. Now, do you believe that you can continue to rely on the information that you've relied on in the past to continue performing class cost of service studies?
- 15 A. No.

- Q. Is it because that information is out of date or is there some other reason? Is it because that information is out of date?
- A. That's one of the reasons. I mean, we have learned, this is going to sound like a non-answer but it's really important, we learned in the Ameren case that, and it was Ameren's witness testifying about what he does for both utilities and he's also the depreciation professional retained by Evergy, we learned in the Ameren case, Mr. Spanos testified more or less that the

continuing property records do not align with what occurs in the field.

The wording in 1 is getting at what is in the continuing property records. How much effort to throw into study of the continuing property records if we know it doesn't reflect what's in the field is a big question. So that is -- I can't really answer your question without that context.

- Q. Fine. I'll actually move on. I think that there was conversation yesterday that there might be alternative ways to reach at least some of the information that's sought here or potentially other information that can solve the same problem. Is that accurate?
 - A. Absolutely.

- Q. So coming to Staff's position statement, because as I read it, Staff's position statement was that you wanted the Company to answer the DRs but not spend the money. Am I interpreting that correctly to try and say that you want to work with the Company to reach an alternative resolution or how should I interpret that?
- A. Well, the DRs we asked were trying to get at the plausibility of alternative ways of getting at the study information so that the data requests that are referenced in Staff's position statement are asking for

things like can you do a survey of the line miles that
operate at each voltage, you know, what would it cost to
send an intern out into the field and look at 100 line
transformers and report back what kind of installation,
you know, exists for those. That's the kind of We
need more information from the Company about what they
can do for a given budget. And frankly in retrospect I
should have asked them in the alternative. I should have
gone through each of these items and said if you had ten
grand to spend to study line transformers what would you
do, if you had ten grand to study primary distribution
costs and expenses by voltage, what would you do, and so
on.

Q. You know, both your answer now and what I heard, you know, when Brad Lutz was testifying yesterday really leads me to believe that there is a common ground that can be reached here. One of the things I don't understand about this case is the timeline. So I went and I actually looked it up this morning.

My understanding is that this case originates from your direct testimony in the last Evergy rate case. Is that fairly accurate?

- A. There is additional background but most directly, yes.
 - Q. So that was -- I went and looked it up and I

saw it was June 22, 2022 is when that was filed. Do you recall is that fairly likely to be accurate?

- A. I have no reason to doubt your representation.
- Q. Okay. So then we had a stipulation in that case, that was September 30, 2022, and I think that's in the record as part of the Joint Stipulation of Facts.

 That stipulation said that the Company had to act by July 1. The Company filed this case June 6. What communication was there between Staff and the Company in the period between that stipulation in September 2022 and the filing of this case on June 6?
- A. Immediately it was either concurrent with day before, day after signing the stipulation. I recall having a good discussion with Mr. Lutz about we understand you don't have exactly this data in exactly this format, you know, that's why we're giving you another nine months to do this, you know. So let's talk about what you can do and let us know and we'll figure it out from there, and I do not recall hearing from Mr. Lutz on this subject again until either they filed the notice or we filed the complaint. I don't recall which came first.
- Q. Again, I was looking at this case. It was filed June 6. I found the joint proposed procedural schedule October 5 with an order filing it October 18 and

- direct testimony November 1. I looked at when the Staff was filing its data requests and those appear to be hitting after direct testimony. So my question now becomes from the period where this case initiated in June to let's start with that October joint proposed procedural schedule, were you guys communicating then?
- A. So Evergy filed or Evergy had a workshop that really tangentially addressed some of where the Company thinks it's heading with rate design, but it really -- it's attached to my testimony. It speaks for itself as to what was addressed, but that's the only discussion that I can think of that was anywhere close other than that Evergy attended Staff's workshops with Ameren and I think some of those occurred during that timeline where much the same issues were being discussed and, you know, I think I called Mr. Lutz's attention to some of those issues as they were being discussed and said that's the kind of thing we could look at with Evergy as well as far as alternative data for existing rate disparities.
- Q. So if I understand that answer correctly, is it safe to say that Staff wasn't aware of the Company's answer to the data requests that you had raised back in your direct testimony in ER-2022-0129 and 0130 until they filed direct testimony in this case?
 - A. No. So you just referred to them as data

- requests. I think you mean the stipulation provisions. To be clear, we did have data requests in the 129/130 cases on this topic. One of them had a really useful response that had to do with kind of some sample customer customer specific information data or premise specific information data, the sort of thing that's recovered in the facility's charge. The rest of them I think, you know, we asked for hey, you know, your CCOS had a split between primary and secondary distribution, give us a calculation, and the response was that requires analysis and you can't compel us to perform it.
- Q. Given where you're sitting right now, do you feel like if you could turn back the clock, do you think you could have reached a conclusion that would have worked if you guys had started talking well back before, maybe before they filed this case?
- A. I mean, I think we would have just taken it to hearing in the rate case rather than just delayed the additional year.
- Q. Let's say that you had signed the stipulation though. Was there -- Do you think that you can get to a point with the Company you can get the information you need based on the testimony you've heard so far through this hearing?
 - A. I'm not really any more sure about what the

Company is and isn't willing to do today than I was last

June. I was confused by a lot of statements yesterday.

- Q. All right. Well, I'll leave that off for now. So I'm going to take up 2, 3, 4 and 5 at a moment here together. The reason I'm going to do that is because when I was listening to your counsel give her opening statements, I could have sworn she said something to the effect that Staff now believes those might be moot. I might not have heard that correctly so I'll just ask. Are there any issues related to 2, 3, 4 or 5 that are now moot?
 - A. It depends. Again, we're looking for clarity from the Company. So 2, and I'll have to look really closely here so I don't reverse them. 2 refers to total number of customers on a rate schedule whether or not they have AMI metering. 3 refers to total number of customers on a rate schedule that are AMI metered. So to the extent that there are now rate schedules where every one is AMI metered, then there's nothing else to do there.
 - Q. So these might be somewhat mooted already?
 - A. So either 2 or 3 should give us more or less the same answer or really, really close to the same answer, and I think Ms. Dragoo did say that yesterday as well. Now, 4 is asking for how much energy was consumed

1 by each rate schedule. So that's different than 2 and 3. 2 You need them both to come up with usage per customer. 3 But 2 and 3 are how many customers are you adding 4 together. 4 is add them together. 5 is you can't add --5 If you have a customer that's metered at 240/120 volt and 6 a customer that's metered at, you know, 4 KV, you can't 7 just add those together. If you have a customer that's 8 measured at 34 KV, you can't just add those all together. 9 So 5 relates to the adjustments that need to be made in 10 order for those numbers to be added together where you're 11 not introducing errors of between, you know, 2-1/2 and 5 12 percent by adding together customers who are metered at 13 different voltages.

14

15

16

17

18

19

20

21

22

23

24

25

So what I understand from Ms. Dragoo is that when that is sent to the meter -- or I'm sorry, when that is sent to the billing system, that information has already been adjusted out. Now, we had Mr. Bass's DR that we discussed with Ms. Dragoo yesterday in which he stated in the last rate case he did just add those together without adjusting them for voltage. So you're going to have errors of 2 to 5 percent. So I'm not sure because everything Ms. Dragoo says in her testimony is caveated by saying we'll do it to the extent we've done it in the past.

So that's -- I'm more confused today than I've

been on this case about what the Company can actually do or not do with regard to providing us information.

- Q. I appreciate that answer, but locked into part of what you just said makes me believe, and correct me if I'm wrong, there is a possibility that the data request in 5 might already be included in what the Company does and therefore you wouldn't need to provide 5; that's a possibility?
- A. That is a possibility caveated by the Company's response concerning this exact data in the case that arose in the stipulation that they're fine adding together dissimilar voltage metered data.
- Q. So based on that, there's a possibility that if you had a larger conversation with the Company and cleared up some of this confusion you might be able to effectively eliminate the costs associated with 5. Is that accurate or not?
- A. Well, so Staff asked this clarification in data requests and those were the data requests that we referred to as saying we need the answer to those to give you a complete position on 2, 3, 4 and 5. So yes, a conversation would help, but I think we're at the point and this is so technical and so detailed that I think that conversations are probably a little bit past the point of usefulness and we need to see specimen data and

specimen calculations to understand what they can actually provide.

- Q. Fair enough. Let's move on to 6 then. Now, 6 was a bit of an odd one. The Company flagged this. This is effectively just pointing out that the Commission may design certain customer subsets for more granular study and if such designations have been made you would need to provide -- retain additional information for those subsets. Now, Staff wasn't itself anticipating any particular designation of subsets, were they?
- A. Examples that we had discussed with the Company that came up in prior cases where the Commission expressed interest in customers who receive LIHEAP or customers in a particular zip code, that sort of thing. Those were examples that I recall discussing, you know, as this was a litigated issue or a punitively to be litigated issue in the last rate case. Those were examples I recall discussing with the Company. We didn't have any in mind at the time but just to be aware as they're setting up software that if we're doing a lot of programming, let's get the capability we think we're going to need and not wait until it's too, you know, imminent.

THE COURT REPORTER: Wait a minute. LIHEAP?

THE WITNESS: I'm sorry. L-I-H-E-A-P, and I

- 1 | believe it stands for Low-Income Heating I think
- 2 Education and Assistance Program but I'm not confident on
- 3 the E.
- 4 MR. CLIZER: I don't know either off the top of
- 5 my head.

14

15

16

17

18

19

20

21

22

23

24

25

- 6 THE WITNESS: Energy Assistance Program, a
- 7 | voice from above.

this in the future?

- 8 BY MR. CLIZER:
- 9 Q. So if I understand your position, what 6 is 10 really asking for is effectively to have the Company kind 11 of future proof or at least think ahead as designing its 12 programs in case the Commission might want something like
 - A. To be fair, yeah, recognizing we can't anticipate every scenario, but LIHEAP and zip code seem like good places to start.
 - Q. 7 and 8 appears that the Company can already provide that. I don't think there's much we need to say on those two unless there is some reason you think that there is a problem with 7 and 8.
 - A. Well, so 7 and 8, they have them on here as -let me -- So 7 and 8 are an issue when we get to, I guess
 it's 8c, d. Again, he numbered these a little bit
 differently than I did. So for purposes of a general
 rate proceeding, we are supposed to have access, we being

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- Staff, are supposed to be able to get access to that 36 months of data to look at customer impacts, study responses to weather, that kind of thing, you know, if we're doing a more detailed study. It's not something I'd anticipate requesting every case but the availability of that data to be delivered to Staff on a 36-month basis is kind of intrinsic as what's on here as 7 and 8.
- I'm going to move on because again I 0. didn't think that 7 or 8 would be a problem. So I'm going to move on to -- Oh, I just now realized that there's 8b. I'm sorry. I was confusing. I meant 8a on I do apologize for that confusion. the front page. realize now it was my fault. Flipping over to the other side of the schedule, page 2, let's take up 8b. unique on this sheet. It's the only one with a green availability but a red deliverability which leads me to believe that hopefully there's a way that you can resolve this just by figuring out how to deliver the information. So in that box Evergy has said basically, as I read it -let me ask you this. Is my reading correct that says the problem here is the 15 minutes view of system peak?
- A. I thought so until a data request response said they can't even do it on 30, and 30 is their -- so we -- In Brad Lutz's testimony in rebuttal in the rate case, he said Evergy said they could do this. They said they

- couldn't do it for residential, they may not be able to do it for all of SGS but they said do this for the other commercial and industrial classes and then in their testimony in this case they can't. And so initially I thought maybe we could address this. So Evergy West does its NCP demand charges and its facilities' charges --
 - Q. One second. NCP?

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

- A. Oh, I'm sorry. Non-coincident peak.
- Q. Please continue.
- A. So currently a lot of revenue recovery comes from an a non-coincident peak of large customers, and large customers can include some fairly small customers, around the clock. Evergy West assesses that based on the highest 15 minutes. Evergy Metro assesses that on the highest 30 minutes.
- So I asked in a data request to Mr. Lutz, okay, can we do 8b if we do 30 minutes for Evergy Metro, and I believe the response was well, we haven't considered that but we don't think we can, we still have the same answer that's in testimony.
- Q. I'm sorry. I got confused there. Did you just say that they are doing it currently but they can't provide the data?
- A. I'm sorry. So their NCP currently is on 30 for Evergy West. I'm sorry. Evergy Metro. So if it was the

1 15 minutes is the issue, that's how Evergy West already 2 bills which Mr. Lutz said in rebuttal in the rate case in 3 response to the testimony that resulted in the 4 stipulation they can provide it, just not for residential 5 and SGS, and now in this case they've clawed that back. 6 And this is an issue the industrials have brought up. 7 This is an issue a bunch of jurisdictions are doing. 8 Most of the co-ops in the state. Evergy's response on

this issue is just legitimately confusing to me.

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- Q. All right. I'll move on again. 8c. Now, if I understand 8c correctly, that refers back to 1. I'm hoping that if you guys reach an alternative resolution to 1 that would resolve 8c. Would that be an accurate statement?
- A. So I view 8c as being, you know, kind of updates from time to time. We tend to look at big views of the distribution system every couple of decades. The last time it was really looked at in line with rates was in the '90s. So I view 8c as we're not going to do a full blown distribution study in every case, we're not going to go through everything in 1 in every case, but maybe, you know, we'll ask for hey, could you give us an update on what your cost for, you know, this type of conductor is, can you give us an update on what your cost for this type of meter is. I view that as what 8c is

speaking to.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- Q. I'm actually going to go off track here for just a moment. You brought up something that I wanted to get into. So Staff is relying on a distribution study for Evergy that dates back to the 1990s currently; is that accurate?
- Well, it's not really a distribution study. Α. Ιt was an agreement among the Staff, the industrials involved at that time and KCPL about how to align each party's view of cost with what the rate structure is. the rate structure was agreed to back in '96 and carried forward with, as Mr. Lutz said yesterday, changes made in So it's not like there's a literal study that we cases. say here's how much it costs to install a meter for a customer who's using, you know, a big factory. It's that we said, we being Staff 30 years ago, said we agree with the Company that if you have a meter of this size, you should be charged a customer charge of this size. have, you know, facilities of this size, you should be charged a facility's charge of this price. That's what we have from the '90s. We don't have a literal distribution study. We have an agreement about how to price in a way that is not unduly preferential.
- Q. What you said jogged my mind. That agreement, since that's the term you used, from 1996, that was the

Page 265

- thing that was attempted to be brought in yesterday; is that right?
 - A. Yes.

- Q. And so if I understand you correctly, I want to make sure I get this right, that thing has formed the sort of pathway from 1996 until today of how Staff approaches class cost of service in Evergy cases with some modifications along the way; is that accurate?
- A. So the modifications come in as the result of rate cases. But when Staff looks at customer charges, those are the things we're trying to put in customer charges for Evergy. When Staff looks at facilities charges, those are the things we're trying to put in facilities charges for Evergy, and that's why we need the information that's in item 1 about the relative costs of metering for customers of different sizes, the cost of facilities for customers of different sizes.

The big one is just the split between primary and secondary in terms of the cost of the distribution network system.

- Q. So your position is you need the things in item 1 to do what was set out in 1996? I'm confused.
- A. The rate structure of Evergy and the rate structure of KCPL, which has since been pretty closely applied to Evergy West, includes certain elements. Those

elements are priced differently based on customer characteristics. I can't sign my name on an affidavit saying that a rate result is just and not unduly discriminatory if I don't have some basis for why those prices are different based on those existing characteristics.

- Q. I think I'm beginning to understand it better.

 All right. Well, you answered my question on 8c1. I

 need to be careful here because it's being broken down

 even further. 8c2 just references above. So I assume

 that we don't need to discuss that one. That's taken up.
- A. Well, this is where timing is really important. So Evergy is months behind other Missouri electric utilities on providing usable billing data and usable load data in rate cases for Staff to do an update period. And update periods I think are a feature fairly unique to Missouri or at least Missouri led the way is my understanding in use of update periods and true-ups to mitigate regulatory lag. With Evergy, we're coming into a case looking at the relationship between energy usage and weather for a period that's 18 months old before the case starts. And that's not terribly uncommon for a utility direct filing.

What's unique with Evergy is the lag in what they can provide for Staff to perform its update which is

Page 267

a key tool to mitigating regulatory lag. And Kim Cox and Michael Stahlman are going to be better to discuss that with.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- Q. I'll bring it up with them then. Thank you. So again, 8c3, that's another one that the Company has the available data and it thinks it can deliver it. So I take it there's probably no problems with that. Is that accurate?
- Α. So this is one I just find shocking that No. the Company says it's going to cost them 260 hours and \$42,000 to do something they weren't going to do anyway. So the Company routinely comes in with proposals that will change rate design for customers, that will change how customers are being charged and will have different impacts on different customers. So if the number needs to be something other than a hundred, and by the way Evergy changed this request to say a hundred total customers, not a hundred per rate code, not even a hundred per class. But if Evergy isn't looking at this, I would be really concerned with the utility in the year 2024 that is proposing any changes to rate design and not looking at impact sample customers.
- Q. I mean, you say that. Have you talked to other companies about this?
- A. We get this from other companies.

Page 268

- Q. So this information is something you already receive from let's say Ameren Missouri?
- A. I believe Ameren gave me sample customer data in their last rate case and they aren't even fully AMI yet.
 - Q. What about Empire or Liberty?

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

- A. I know when we've discussed this with Liberty they said it wouldn't be an issue to provide it. I don't recall given the timing of the last rate case if we did this or not.
- Q. What about 8c4 then? Is that one that we can at least say is resolved?
- A. Sorry. I'm just making sure of the difference. Okay. So the difference between c3 and c4 is c3 says if you have more than a hundred customers, give us a hundred customers. So for example, some of the classes have and some of the rate codes have far fewer than a hundred customers. Some of them have 50 customers. So the difference between c3 is if it's a big class, give us a hundred sample. If it's a class that has fewer than a hundred, give us everybody.
 - Q. In that case I would assume that all of your same comments regarding c3 would apply equally to c4?
 - A. Absolutely.
- Q. Thank you. That explains that. 8d. Again,

that's one of the see individual items above. I'm hoping that that one doesn't have any concerns; is that right?

- A. This is the one that I was jumping to when you asked about the earlier provision. So we addressed that, yeah.
- Q. That brings us to 9. Now, yesterday I had an interesting conversation with Mr. Brad Lutz about 9, and my understanding from the Company based on that conversation, and the record will speak for itself on this, was that the Company felt they wanted to have the issue litigated and that they would provide determinants for a coincident peak if that was something that the Commission ordered in the future. Has the Commission addressed coincident peak charge in past Evergy cases?
- A. So in the last Evergy rate case, I mean, the order speaks for itself, but what happened in the last Evergy rate case is that MECG proposed on-peak demand charges, coincident peak demand charges, Staff proposed introduction of a time of use overlay and Evergy said we can't do this, we don't know how it's going to impact customers and the Commission agreed and said we don't want to order this until we know how it's going to impact customers. So we're in a very strange loop here where we can't look at determinants until it's ordered but we can't order it until we look at determinants, and I agree

2.0

2.2

January 31, 2024

- I don't want to order something that we don't know what the charges would be, what the determinants are. That's a big problem. We don't want to do that. But that's why we need to look at determinants.
- Q. So I think you've already covered this but just to make sure it's clear, Staff says we need the information so we can get the determinants so we examine it in a rate case because in the last rate case the Commission said we can't order it absent the determinants. Is that accurate?
- A. I think what the Commission said is we can't order it because we don't know customer impacts and customers don't know what it would do to them, that sort of thing. The order speaks for itself. I'm not trying to put a spin on it. That's my recollection of how we got where we are on this issue.
- Q. Just to make sure that it's clear for the record, the information you're seeking here would be necessary to determine the customer impact of a coincident peak charge?
- A. Yeah, yeah. And I mean, Mr. Lutz raises a fair point that we'd have to talk about what periods to study and Staff has asked in data requests what's your preferred period and here are some periods for you to consider and the response was this would require analysis

and we aren't going to do it.

- Q. All right. So having gone through all nine of these data sets as they're set out, again, I don't want to paraphrase you too much, but looking at the prices here, I think that on 1 there was a conversation that we might be able to reach some type of alternative consideration.
- A. I said in my rebuttal not to do what is on 1.

 I don't know how there's any confusion on the Company's part at this point.
- Q. Okay. So we'll just leave off 1 then. I'll just move on. The rest of these, and I'm going to do the math really quick here, 2 and 3 were mutually exclusive; is that right?
- A. They'll be really, really close. Based on Mr. Lutz's testimony yesterday, it would only apply to certain residential customers and, you know, it depends on how many that is but it should be really, really close.
- Q. I'm going to just take 21,000 then for 2 and 3. I'm just going to use their numbers just to keep this clean. If I add on 54,000 then for 4, 5 might be able to get taken care of depending on the answers we see, so I'm going to leave it out for a moment here. The next one I see coming up really is 8c2, 20,000; 8c3, 42,000; and

- 1 8c4, 40,000. If I just add up just those, and I don't
- 2 | know if you did the math yourself, I'm getting about
- 3 | 177,000 we're talking about, does that seem like an
- 4 | accurate calculation of those?
- 5 A. I accept your addition.
- Q. Let's try and put that in perspective actually
 you know what. Evergy brought in a -- retained an expert
 for this case, an outside expert. You're familiar with
 that, right?
- 10 A. I am aware of that, yes.
- MR. CLIZER: Mark an exhibit. This should be
- 12 | 304.

- JUDGE HATCHER: This will be marked.
- 14 MR. CLIZER: This will be confidential. I will
- 15 | endeavor my best to avoid any discussion of confidential
- 16 | information directly in my discussion.
- 17 BY MR. CLIZER:
- Q. Ms. Lange, would you agree with me that this is an Evergy data response to OPC Question 2000?
- 20 A. Yes.
- Q. And again I stress this is confidential information. So please move slowly to avoid saying anything in case we need to go in camera. I will prefer not to. Now, I believe the testimony of Mr. Riley

identifies him as a partner at the firm of PWC or Price

- Waterhouse Coopers. In fact, I can cite you to the exact line if necessary. But will you agree with me for a moment that he's a partner?
 - A. I'd say that that testimony would speak for itself.
 - Q. And if you turn to the page 2 of the attachment here, which actually let's back up. This question that was posed to Evergy asked for the contract agreement between Evergy and Price Waterhouse Coopers. Would you agree with that?
- A. Yes.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

- Q. And the attachment is the contract agreement between Price Waterhouse Coopers and Evergy?
 - A. That's what it is labeled.
- Q. If you turn to page 2 of that agreement, you'll see the price per hour for a partner level individual?
- 17 A. I see that.
- And if we take Mr. Riley's word yesterday that 18 Q. he has worked some hundred hours at least on this case, 19 20 again, moving slowly so that we do not violate confidentiality, if I multiply that hundred hours by the 21 22 partner level, you would agree with me that Evergy has 23 already spent quite a lot on this case compared to what 24 it might otherwise have cost to enact the changes that it 25 claims?

Α.

25

mine.

1 I am not comfortable answering that in public. 2 Given that we're -- if a hundred hours is the hours, that 3 makes this a lot easier I think for us to avoid stating 4 that by perhaps just introducing the exhibit. 5 You're right. Your Honor, I'll MR. CLIZER: 6 just move for the introduction of the exhibit and try and 7 take up the issue in briefing, assuming there's no 8 objections. 9 JUDGE HATCHER: You've heard the motion. Exhibit 304 Confidential. Due to Commission rules, there 10 11 will be a public version that will be redacted in full. 12 Are there any objections to the admission of Exhibit 13 304C? Hearing none. So admitted. 14 (OPC'S EXHIBIT 304C WAS RECEIVED INTO EVIDENCE 15 AND MADE A PART OF THIS RECORD.) 16 BY MR. CLIZER: 17 All right. Do you have a copy of your own Ο. 18 testimony? 19 Α. Sorry. I didn't reorganize my folder I hope. 2.0 yesterday as well as I tried to do. It may take me a 21 I am not sure if I have it with me. 22 attorney might happen to have an extra copy, that would 23 probably move things along. 24 Do you have one or I can lend her MR. CLIZER:

- THE WITNESS: I apologize. I suspect it is
- 2 | sitting on the copier in fact.
- 3 MR. CLIZER: I think we have a copy coming to
- 4 her.
- 5 THE WITNESS: Thank you.
- 6 BY MR. CLIZER:
- 7 Q. You have a copy then?
- 8 A. I do now.
- 9 Q. Turning to page 60, if you would be so kind.
- 10 A. I forgot it was this long. My apologies to all involved, yes.
- Q. So at line 22, you identified -- well, actually it begins on line 21 and then continued on for several more lines and several more pages.
- 15 (Discussion off the record.)
- 16 BY MR. CLIZER:
- Q. You discuss the fact that you had previously outlined the Staff's proposed rate modernization plan as part of a case number identified EW-2017-0245. Is that accurate?
- 21 A. That's what it says.
- Q. Now, during the opening of Evergy counsel, they
 identified that Staff's -- well, they identified what
 they characterized as Staff's long-term rate plan vision
 for the future. Notwithstanding that characterization,

- they stated basically that this issue has never been put before the Commission, has never been approved, or never been identified as policy of the Commission. You would agree with me that Staff's rate modernization plan at least in part was laid out in part of this docket as you identified in your testimony, correct?
- A. I have summarized or included this statement in I think every rate design case I filed since this docket, since the EW docket occurred, and we're open and eager to get feedback on modifications to, you know, just respond to changes in realtime.
- Q. With regard to it as it appeared in that case, EW-2017-0245, that was where you were identifying what the Commission could consider as certain rate structures and rate designs to enhance customer responsiveness to DER or distributed energy resource opportunities; is that accurate?
- A. It is. We tried to be more comprehensive than that. In part the concepts of the continuous rate design element in particular was included in response to this exact situation we're in here today where utilities have information but they don't have it by rate code, they don't have it by rate class. So that element of it is more of a recognition of utility data limitations and less directly addressing the DER problem, but they fit

- together. So it kind of had to be comprehensive and involve both.
- 3 MR. CLIZER: Mark an exhibit 305.
- 4 JUDGE HATCHER: So marked.
- 5 BY MR. CLIZER:

2

10

11

12

13

14

15

16

17

18

19

20

21

22

- Q. Ms. Lange, would you agree with me that this is the Commission's filed Response to Staff Report Regarding Distributed Energy Resources that was filed in same case EW-2017-0245?
 - A. That's what it's labeled.
 - Q. And you would agree with me, if you read it carefully to yourself, that it identifies Staff's recommendations beginning in the paragraph, second paragraph of page 1 continuing on to page 2 and includes specifically at Item No. 4 the Commission considers certain rate structures and rate design to enhance customer responsiveness to DER opportunities by providing appropriate price signals to consumers and revenue recovery for utilities.
 - A. Was there a question?
 - Q. You would agree with me that that's predominantly what it says?
 - A. Yeah, I think you read Item 4 word for word.
- Q. You would agree with me that beginning at the top of the next paragraph it states the Commission

- 1 | accepts the recommendations --
- THE COURT REPORTER: I'm sorry. Can you slow
- 3 | down just a bit?
- 4 MR. CLIZER: I'll try my best.
- 5 THE COURT REPORTER: Thank you.
- 6 BY MR. CLIZER:

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- Q. You would agree with me that beginning at the first full paragraph of page 2 it reads the Commission accepts the recommendations offered by Staff and determines that they promote good public policy?
 - A. That's the first half of that sentence, yes.
 - Q. I'll go ahead and read the rest of it just for the sake of completeness. And that it would be advisable to further consider the specific merits of each inappropriate case where the impacted parties will have an opportunity to be heard. Based on that language, would you not agree with me that the Commission has at least in the past identified that it believes it is good public policy for Staff to pursue the rate modernization recommendations that it outlined in this docket in its report?
 - A. So part of the Staff recommendation in the report included being responsive to what happens between now and then. You know, at the time that this was done, Evergy was the only utility with AMI meters at this

- point. All of the electric utilities are fully or nearly fully deployed and things have happened with ARCS that changed some things. ARCS, I'm going to get the acronym wrong but referring to Aggregating of Demand Response at an RTO level. So with the caveat that flexibility and responsiveness to the situation on the ground was included in the Staff recommendation, yes.
 - Q. And in addition to that, it is my understanding, and I want you to correct me if I'm wrong, that the Staff recommendations here in this case are predominantly being drawn from recommendations by the Regulatory Assistance Program, or RAP; is that accurate?
 - A. Staff's recommendations in this case are just about the Commission ordering this docket to stay open to get information.
 - Q. Is the Staff's rate modernization plan in part reflecting the recommendations by the Regulatory
 Assistance Program?
 - A. Here's where Missouri frankly led a bit. While Mr. Lazar I believe was involved, I'm going to get which of the RAP professionals were involved in the Missouri docket, I think that, and I'm not taking pride of authorship here, it's going to sound like it but I'm not, I think that Staff's what we laid out in EW-2017, I think that actually came before RAP came out with the rate

1	design manual which I believe was in 2019. It is
2	consistent with that. We had a number of discussions
3	with professionals from RAP who came in and actually
4	conducted the workshop. The bulk of the report in
5	EW-2017-0245 is actually just summaries of the
6	presentations of the various utilities and of the RAP
7	professionals. LeBel, it was Marc LeBel, I believe, not
8	Lazar.
9	JUDGE HATCHER: And the bench will add while
LO	we're taking just a second, ARC, A-R-C, is Aggregator of
L1	Retail Customers.
L2	THE WITNESS: I appreciate that, Judge.
L3	BY MR. CLIZER:
L4	Q. Finally, would you agree with me that the
L5	policies that Staff has pursued as part of its rate
16	design structure are consistent with what the Commission

has adopted from PURPA standards -- let me spell that out, Public Utility Regulatory Policy Act of 1978 -- that it has adopted in the past?

17

18

19

20

21

22

23

24

25

Α. Yeah, and that's huge. And I apologize. Ι should have addressed that in my rebuttal. actually I guess the request of Evergy to ignore class cost of service didn't come in until surrebuttal. yeah, this Commission is bound to address the requirements of PURPA 1978, which includes cost of

January 31, 2024

1	service related components and justification of
2	components such as declining block and it ordered, you
3	know, there are Commission orders binding the Commission
4	going forward about how class cost of service elements
5	need to be addressed. Now, those are second nature to
6	Staff and I frankly don't even think about them because
7	they're fairly obvious constructs. But if we aren't
8	studying and ensuring that those relationships that cause
9	price differences to similarly situated customers, if
10	we're not making sure that those are reasonable, we're
11	going to be violating federal law in a hurry.
12	Q. And just to clarify, the information that
13	you're seeking as part of this case is necessary you
14	believe to achieve that end and avoid violating the
15	federal law?
16	A. To the extent that those price disparities
17	exist in a tariff, yes.
18	MR. CLIZER: Thank you very much for your time.
19	I have no further questions at this time.
20	JUDGE HATCHER: Thank you. We'll go to the
21	Company for cross-exam.
22	MR. FISCHER: Thank you, Judge. Good morning,
23	Ms. Lange.
24	THE WITNESS: Good morning.

I hope you had a good evening.

MR. FISCHER:

	Poge 202
1	Page 282 I've tried to shorten my cross quite a bit. So I hope we
2	can get through this fairly quickly.
3	CROSS-EXAMINATION
4	BY MR. FISCHER:
5	Q. Do you have a copy of your testimony in front
6	of you now?
7	A. I do now.
8	Q. Is it your understanding that Evergy does not
9	keep plant accounts or expense accounts that are
10	differentiated by rate code or voltage level?
11	A. That's been my understanding since 2006, yes.
12	Q. Okay. So you always felt You've always
13	known that even when you asked for the first set of data,
14	is that right, for the first set of data in this case?
15	A. Well, that's why the recommendation was made is
16	to develop information that we know doesn't just exist.
17	If it just existed, we wouldn't need to ask for it.
18	Q. Okay. So you knew whenever you asked the first
19	set of data that that data didn't exist, right, is that
20	what you're saying?
21	A. Well, there's a lot of things There's a lot
22	of separate items in item 1. You're talking about
23	stipulation item 1?

I'm trying to clarify what you just Q. Yes, I am. testified to. That you knew when you asked that, for

24

1 | that information that it didn't exist?

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

- A. Well, I'm sorry. I don't understand the question.
 - Q. Let me just go on a little bit. You don't disagree with Mr. Lutz when he testified that Evergy does not keep plant accounts or expense accounts by voltage level, right?
 - A. I agree Evergy doesn't do that. That's why we recommended that it be done and why we pursued a stipulation with Evergy that they do it.
 - Q. Okay. And you agree with him that the Company does not keep plant accounts or expense accounts by rate code either, right?
 - A. Could you say that again.
 - Q. You agree with Mr. Lutz that Evergy does not keep plant accounts or expense accounts by rate code or by voltage level for their normal operations, right?
 - A. They have -- They do with regard to distribution versus transmission versus certain subtransmission accounts.
- Q. So you do disagree with Mr. Lutz when he testified that they don't keep it by voltage level and by rate code?
- A. If you're lumping everything in item 1 together, I think the answer to that question is I agree

- that Evergy does not do already exactly what is in item 1 which is why we recommended in the last rate case and possibly others that they do a study to estimate these costs in the manner reflected because that's what their rate schedules desperately charge customers.
- Q. I'm just trying to understand where our differences are. So you do disagree with Mr. Lutz to that extent?
- A. If you could point me to what you're referring to Mr. Lutz as having said. I'm a little bit -- Well, I'm lost.
- Q. Well, the record is going to reflect what he said yesterday. Let's move on. Would you turn to page 32 of your rebuttal testimony?
 - A. I am there.

- Q. Let's look at line 18 where you say the information is relevant to rate design under Evergy's existing rate structures and it's also relevant to Staff's recommended rate modernization; is that correct?
 - A. That's -- I believe you read that accurately.
- Q. Now, I believe you testified, and I just want to make sure it's on the record, that you have presented your views about rate modernization to Evergy and other stakeholders in the rate modernization discussions that were held last summer?

- 1 Could you state that again. Α. When you say last 2 summer, I'm not sure what you mean. 3 Q. August 28, 2023. 4 Α.
 - Was that the date of the Evergy presentation or the date of the Staff presentation?
 - That was the date of the Staff presentation. Ο.
 - I provided a summary view, yes. Α.

8 MR. FISCHER: Judge, I'd like to have an 9 exhibit marked.

- 10 JUDGE HATCHER: Go ahead.
- 11 I don't recall my number. MR. FISCHER:
- 12 You're on 7. It will be JUDGE HATCHER:
- 13 Exhibit 7.

5

6

- 14 Thank you. MR. FISCHER:
- 15 BY MR. FISCHER:
- 16 Ms. Lange, does this document appear to be the Ο. 17 power point presentation that you presented to Evergy and other interested parties in those discussions with 18 19 Evergy?
- 20 If you're representing that you've accurately Α. 21 reproduced it, it does.
- 22 Ο. I did the best I could. I hope I did. Did you 23 have a meeting on August 28, 2023, where you presented 24 this power point to the Company and interested 25 stakeholders?

A. I believe so.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

21

2.2

23

24

- Q. The Company and Staff have actually had two meetings regarding rate modernization, one on August 9 and a second meeting on August 28. Is that your recollection?
- A. If I recall correctly, the first one was on a date that I had indicated to Evergy I wasn't available. So I'm not actually certain of the date of that. It was conducted while I was on vacation.
- Q. I may have misunderstood your testimony but I thought you said you attached the Evergy power point to your testimony. Is that what you said?
- A. Again, this is all sort of running together.

 I'm confident there was a meeting that Evergy scheduled while I was on vacation. I don't recall if it was that or a different one, but I did attach the power point that I received later.
 - Q. To your testimony in this case?
- 19 A. Yes.
- Q. Would you point that to me?
 - A. It should have been attached I'll say. I was actually just flipping and trying to see if it was on here. I'm hoping that it's just the version that I have didn't have it attached.
 - Q. Could you be mistaken in that you actually

- 1 attached it to the Staff complaint that you filed against
- 2 | Evergy for not holding rate modernization discussions?
 - A. That could be. We have a lot of Evergy cases in right now.
- Q. Complaint case covers several topics, too, doesn't it?
- 7 A. It does.

4

- 8 MR. FISCHER: Judge, I'd move for the admission 9 of No. 7. I'd move for the admission of Exhibit 7.
- JUDGE HATCHER: Thank you, Mr. Fischer. I was
 just waiting to catch Ms. Kerr's attention before I start
 my very fast question. Any objections to Exhibit 7?
 Hearing none. So admitted.
- 14 (COMPANY EXHIBIT 7 WAS RECEIVED INTO EVIDENCE 15 AND MADE A PART OF THIS RECORD.)
- 16 BY MR. FISCHER:

- 17 Let's turn to the second slide on Exhibit 7. Ο. There it states this discussion is intended to be 18 19 generally applicable to all Missouri investor-owned utilities, but may not apply to the particular facts and 20 21 circumstances of each regulated utility. In particular, 22 the availability of information to reasonably design 23 facility charges is expected to vary. Is that right?
 - A. You appear to have read that accurately.
- Q. And you agree with that, right?

A. I do.

1

2

3

4

5

6

7

17

18

19

20

21

22

23

24

- Q. Now, are the residential rate structures and the nonresidential rate structures that are contained in that power point your proposals for a path forward for future rate cases and rate design cases in Missouri?
 - A. So proposal is not a good word.
 - Q. Okay. What's the right word?
- 8 Α. Well, the right word is we had a meeting to 9 discuss things and so we outlined options. particular, the way that I addressed on-peak demand 10 11 charge versus -- sorry. In particular in this 12 presentation, as I recall, the way that I wrote this, the 13 slides confused participants as to the use of on-peak 14 So that rate structure element demand charges. 15 definitely -- I should have -- I didn't write it clear 16 enough. I accept that. Sorry.
 - Q. I'm just following up on your comment. This wasn't a proposal. What was it?
 - A. It was a discussion. So we're aware that

 Evergy wants to do something they call brightlines.

 We're not aware of what that is. So we were addressing,

 we being Staff, were addressing areas to consider. So

 there's two issues when you think about where to go with

 rates. It's if we had all of the information today, what

 would we do if customer impact wasn't a consideration and

- it's what do we do to get where we would like to be based on what we know today, based on what we know today and based on being reasonable and cognizant of customer impacts. So I would love for this meeting to have resulted in a robust discussion of what Evergy would like, which of these we're eye on eye on, which of these for them are from their perspective a heck no, and unfortunately that didn't occur. So we don't have a concrete proposal because we need utility feedback, we need customer feedback, we need actual information to understand what is and isn't practical.
 - Q. Didn't you testify though there was a meeting where Evergy did give a Staff presentation on their rate modernization on August 9?
 - A. And that didn't address commercial and industrial. That addressed ideas like subscription pricing and other sort of add-on tariff programs that Evergy has been throwing into rate cases for the last decade-ish.
 - Q. And then we had a separate meeting on August 28 where you presented this power point, correct?
 - A. Yes.

- Q. And did Evergy ever say that's the end of conversations?
 - A. I haven't heard anything more from Evergy in

- their filing a rate case in a couple of weeks.
- Q. They didn't say that that they were not interested in talking further, right?
- 4 MS. KERR: Objection. Calls for speculation.
- 5 JUDGE HATCHER: Overruled.
- THE WITNESS: I'm sorry. What was the question? Did Brad Lutz literally say I never want to speak a word about this in the future? No, of course not.

10 BY MR. FISCHER:

1

11

12

13

14

15

16

17

18

19

20

21

- Q. But Staff did file a complaint requesting more conversations, correct? Is that what that complaint is about?
 - A. The complaint speaks for itself. I'm not clear at sitting here today the timeline of when that was filed.
- Q. It was filed two weeks I think after our meeting on August 28. Is that your recollection?
 - A. So you're referring to Evergy's failure to conduct a meeting within 180 days to solicit and receive feedback?
 - Q. Right.
- A. Correct. 180 days were gone and no
 conversations that occurred after that point would change
 that.

- Q. Is it correct that we had -- we didn't make 180, we made 190; is that what happened?
 - A. I'm sorry. Are we addressing the relevance of Staff's?
 - Q. I'm asking you whether we had a conversation 190 days after the tariffs were in effect. That was the first meeting, correct?
 - A. A conversation about what?

2

3

4

5

6

7

8

9

10

11

12

13

14

17

18

19

- Q. Rate modernization whenever the Company presented its rate modernization proposal.
- A. The Company didn't present what I would consider a rate modernization proposal. The Company presented a description of add-on tariffs such as subscriber tariffs and buffet-style pricing.
- Q. And that's the power point that you attached to the Staff's complaint, right?
 - A. I don't have that in front of me today. I don't recall.
 - Q. Let me go back to that. I'll give you a copy of that in a minute.
- MR. CLIZER: Really quick, Your Honor, while
 we're discussing it, what is the number on the complaint
 case just for the record?
- MR. FISCHER: Judge, I can give it to him if you'd like. It's EC-2024-0092.

- 1 MR. CLIZER: Thank you. I'm sorry to interrupt
- 2 | your flow.

6

7

8

9

- 3 MR. FISCHER: That's all right.
- 4 BY MR. FISCHER:
 - Q. Let's just go to the bottom of slide 2. There it states the views presented in this document are those of Sarah L.K. Lange, and are not presented as reflexive of the views at this time of Staff, the Commission or of any particular Commissioner; is that right?
- 10 A. That's what it says.
- 11 Q. And is that disclaimer correct?
- 12 A. I don't know what you mean by correct.
- Q. Well, I mean, I think that reflexive may be the wrong word, but is it correct that the views presented in that document are your views and are not reflective of the views of Staff, the Commission or any particular Commissioner?
 - A. That's what it says, yeah.
- 19 Q. Okay. So you don't disagree with that.
- MS. KERR: Objection. The document speaks for itself.
- MR. FISCHER: Okay. I'll move on.
- JUDGE HATCHER: I would like a straight answer.
- THE WITNESS: I mean, I'll be as direct as I
- 25 | can. I don't speak for the Commission unless the

1	Commission has ordered me to speak for the Commission,
2	and I think I've used this disclaimer on every
3	presentation I've ever given if for no other reason than
4	if I change a font color, I'm not going to waste Staff
5	time to run that back by division directors. I don't
6	think this is inconsistent with Staff's position, if
7	that's helpful, but I'm not purporting to speak for the
8	Commission unless the Commission orders me to speak for
9	them.

JUDGE HATCHER: Thank you.

BY MR. FISCHER:

10

11

12

13

14

15

16

17

18

19

20

21

2.2

23

24

- Q. So then would it be correct to say that the Commission or any individual Commissioner has not approved the whatever you call it, the idea, the proprosals that are included in your rate modernization proposal and your power point?
- A. This power point was not reviewed by the Commission nor was it presented to the Commission.
 - Q. Was it presented to other Staff members?
 - A. Yes.
- Q. Okay. Do you have -- Well, let me ask you this. Is the cost of creating and preparing information a factor in considering whether we should go forward adopting the rate proposals that are discussed in your power point?

A. Could you say that again? There were a lot of parts there.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- Q. Okay. Well, is the cost of creating and preparing the information that would be required to implement your rate proposals into modernization power point, is that a factor to be considered when deciding whether to pursue your proposed what I called your long-term vision for rate design?
- A. I wouldn't agree to the long-term vision characterization, but that would, cost of implementation, feasibility of implementation, yeah, those are obviously things that we would consider and that's why we don't have a concrete, you know, we're in no way trying to dictate what rates should look like 20 years from now. We're saying here are the things that we're looking at.
- Q. Do you happen to have a copy of the Staff Position Statement in this case?
- A. I hope so, again with my caveat that I apparently screwed up my folder yesterday and also failed to grab what I reprinted this morning.
 - Q. I have a copy if you don't.
 - A. That would be great.
- Q. Let me just give you mine if that would be alright, Judge.
 - A. Did we want to admit this just so we don't --

Q. What's that?

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

- A. The presentation that you offered.
 - Q. I think it's already admitted.
 - A. What was the number on that?
 - Q. 7. I marked the area I'm going to ask you about to make it easier. That's a copy of Staff's Position Statement; is that right?
 - A. That's what you represent it to be, yes.
 - Q. Would you turn to the first issue on page 2 where the question is asked what is Evergy Missouri Metro and Evergy Missouri West's estimate for the cost to provide line transformer costs and expenses by rate code. Do you see that question?
 - A. I do.
 - Q. At the very bottom of that there's a sentence that carries over to page 3 of the Staff's Position Statement and it states, and I think I've highlighted it, it would be imprudent to expend the lump sum estimate provided in Attachment BDL-1. Is that what it says?
 - A. Absolutely that's what it says.
 - Q. Okay. Good. And if I look at the position statements related to 1a, 2a, 3a, 4a, 5a and 6a, I'll find a similar statement, right?
- A. That sounds about right. I'm not sure exactly where it cut off recognizing that we don't actually have

Page 296

- cost estimates from Evergy for each of these items. So we're referring to the lump sum. It could be that pursuit of an individual item from the list would be reasonable but we don't have that evidence in this case.
- Q. Do you agree that with Staff's Position
 Statement that it would be imprudent for Evergy to spend
 80 to \$100 million to create and produce the data
 requested in the first set of data?
- A. If that's what it cost to produce it. As I said in my rebuttal testimony, that's not reasonable, no, don't do that, please, don't do that.
- Q. And I think I understood you to say you made that very clear in your testimony that you didn't want the Company to spend 80 to \$100 million on the first set of data in your testimony?
- A. I want that to be as clear as I possibly can, yes.
- Q. Would you show me exactly where you're talking about in your testimony that you said that we shouldn't be spending that much money?
- A. It's under the heading recommended path forward.
- Q. What page are you on?
- A. I'm getting there, Mr. Fischer.
- Q. I'm sorry.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

Staff proceeds to request information to complete a

distribution study. I proceed to provide examples.

BY MR. FISCHER:

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

- Q. So that's where the Company should have concluded that you agreed that it would be imprudent to spend the money on the first set of data, right?
- A. Well, my recommended path forward didn't say order the Company to expend \$100 million. It said do this instead.
- Q. Why didn't the Staff's testimony in rebuttal just say that it would be imprudent to spend the money like you said in your position statement?
- A. At that point, we had outstanding discovery disputes to get line by line information concerning the items in item 1 rather than a lump sum information.
- Q. Well, just so the record is clear, Staff does not now recommend to the Commission that the Commission order Evergy to produce the data in the first set of data, correct?
 - A. Could you say that again. I apologize.
- Q. I'm trying to be clear if I can. Staff does not now recommend to the Commission that the Commission order Evergy to produce the data that was included in the set number 1 or what Mr. Lutz says is DR No. 1?
 - A. At a cost of a hundred million dollars?
- 24 Q. Yes.
- A. No, absolutely not.

- Q. Good. Now, your rebuttal testimony doesn't include estimates from Staff for the creation and production of that data that you're requesting in any of the DRs or any sets of data, correct?
 - A. That's not what the stipulation addressed.
- Q. Well, I'm asking whether you included that in your testimony.
- A. No, I wouldn't have included irrelevant information in my testimony.
- Q. Okay. Do you have the expertise on Staff to make an independent estimate of what the costs would be for creating and producing that kind of data?
 - A. Which kind of data?

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- Q. The kind of data you requested in this case.
- A. There's a lot of different data in this case.
- Q. Do you have expertise -- I guess I'm asking whether that -- Do you consider yourself an expert in estimating the cost of modifying a public utility computer system to implement new rate designs?
 - A. No one has requested that.
- Q. Okay. Well, my question is do you consider yourself I guess an expert in estimating the cost that it would take for Evergy to change its computer system and its accounting systems to produce this kind of data?
 - A. We aren't requesting that Evergy change its

computer systems and its accounting data. No, I'm not an expert in that.

- Q. Okay. Let me just ask you some broader questions I guess. From your perspective, is it the role of the Commission Staff to be fair, objective, and unbiased?
- A. I hate to put it this way, but unless the Commission has ordered us to pursue a specific policy objective or some sort of -- that's a very, very broad question. I'm not sure that I can answer it in the abstract.

Our job is to provide a recommendation to the Commission so that the Commission follows its organic statutes.

- Q. Well, in balancing the interests of the consumers of public utility shareholders, do you try to follow the policies established by the Commissioners through their previous orders?
- A. Well, prior orders aren't legally binding and conditions do change; but with those two very large caveats, yes, generally.
- Q. Well, so how do you decide when Staff should advocate a position that differs substantially from the past practices that have been approved by the Commission?
 - A. I can't answer that in the abstract, sir.

- Q. If a Staff witness is recommending a policy that would cost a substantial sum of money to implement, is there a policy of Staff that you need to get that checked by somebody or approved by someone on Staff?
- A. You used the word policy in that question and that's what makes it not possible for me to answer it.

 I'm not sure what.
- Q. I'm sorry. Let me ask it a different way then. If a Staff witness is recommending a policy that would cost a substantial sum of money to implement, who on Staff would have to approve it before it's recommended to the Commission?
- A. All prefiled testimony is run through the applicable division directors and Staff Counsel's Office.
- Q. So that would include your testimony in this case, right?
 - A. Yes.

- Q. Let's turn to your recommended path forward. I think that starts on page 17 is where you directed me to. I'm looking at line 16 that says Evergy failed to provide cost estimates for items of distribution data and to date Evergy has refused in discovery to cooperate with Staff request to establish the relative costs of provision of distribution data.
 - MS. KERR: I'm sorry. What page are we on?

- 1 MR. FISCHER: We're talking about page 17 at
- 2 | line 16.

9

10

11

12

13

14

15

16

17

18

19

- MS. KERR: Okay. Thank you.
- 4 BY MR. FISCHER:
- 5 Q. That's what you said, correct?
- A. I think you read that accurately, but I'll defer to the words on the page.
 - Q. Are you talking primarily about the distribution data that you requested in the very first set of data?
 - A. So this section recommended path forward has separate question and answers related to the different items, and so that's what the question is asking about is the distribution data.
 - Q. Okay. And then on line 18 it goes on to say that the Commission should leave this docket open as a repository for discovery and for resolution of potential discovery disputes as Staff proceeds to request information to complete a distribution system study; is that right?
- 21 A. I believe you read that correctly.
- Q. Would you describe what you mean by a distribution system study?
- A. Sure. Getting information dependent on what information is available, and I do think this would

probably involve the sort of discussion with distribution engineers that the Company is able to do when it performs a CCOS, but the questions that I have in mind are largely in the data requests that were submitted in this case and those would be things like how many miles of overhead line operate at what voltage, how many miles of underground line operate at what voltage. For secondary circuits, do you have one big line transformer at the end typically.

You know, when we use the phrase secondary circuits, are those operating at 240/120 volt or are those operating at 4 KV, 12 KV. That's the kind of information that frankly just -- I tried to ask the data requests in this case as clear as I could to get answers to those questions. But in absence of that, that's the information that I need to try to figure out how to keep the current prices in the current Evergy rate structure just and reasonable.

- Q. Has the Commission requested Staff to complete a distribution study for Evergy?
- A. I think it depends on how you read that Report and Order, and I think that the instruction we got in Ameren where the Commission said we can't use anybody's CCOS studies because it's on bad data, I sure take that as saying get data to do a good CCOS study. I don't

- think they used those words, but that's how I interpret it.
- Q. Ms. Lange, you've been around a long time. Do you recall any case where the Commission just said this is the best class cost of service study and we're going to use it to set the exact rates?
 - A. To set exact rates?
 - O. To set rates.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

2.2

23

24

- A. To set rates? There are cases, yeah.
- Q. A lot more though that don't adopt a specific class cost of service study as the only way to set the rate, right? We spread it across the board. We do lots of things, but we don't necessarily say it's going to be based only on this class cost of service study.
- A. Okay. I got the second half of the question.

 Could you repeat the first half again?
- Q. I'll withdraw it. It was a little convoluted. How much do you believe the distribution study will cost to complete?
- A. As I said earlier, in retrospect I wish I would have said for each of these items what can you do for ten grand each. I haven't had that approved by the division directors; but based on prior conversations, I think that if we devote a couple hundred worker hours to this at a cost of 40 to 50,000 that that would be consistent and,

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

2.0

21

22

23

24

- Mr. Busch, if I'm out of line on that, too late I guess, but to me that seems reasonable in light of knowing just what it cost to do anything with a large organization and a large amount of data.
- Q. Would you do that in house or would you hire an outside consultant?
- A. Well, the nature of this is almost that it has to be in house, and the sort of conversations we need to be having at this point aren't with people, no offense to Mr. Lutz, I highly respect Mr. Lutz, Mr. Lutz would need to be in the room but, you know, we need to be having these conversations with, you know, a handful of distribution workers, and that's the sort of thing that Evergy represents it does when it prepares its class cost of service is it says well, we talked to our distribution engineers and here's what they said we should do for poles. We don't get that opportunity and we need it.
- Q. Let me ask you this question. You mentioned the division directors. Have any of the division directors suggested to you that you need to be doing a distribution study for the utilities?
 - A. They approved this testimony.
- Q. I'm asking whether they asked you to do a distribution study.
- MS. KERR: Objection.

JUDGE HATCHER: Grounds?

MS. KERR: It's speculation.

JUDGE HATCHER: Overruled.

THE WITNESS: Yeah. I mean, this conversation has been going on -- there was a lot of pushback on my testimony to say we can't do a distribution study or we can't -- don't use any of these class cost of service studies because of concern that Staff has to provide a class cost of service study at a certain point and what could I do to get better data to provide a reliable study. That was a big topic of conversation in these Evergy and Ameren rate cases.

BY MR. FISCHER:

- Q. If the Commission leaves this docket open as a repository for discovery and for resolution of potential discovery disputes, would you expect to be filing data requests similar to the ones you filed in this case?
- A. I've thought a lot about this, and I've thought a lot listening to Mr. Lutz yesterday and a conversation I had with Mr. Lutz a week or two ago. What could we have done differently to have not effectively wasted a year and a half on this.
- I think what we need to do is instead of doing this in the form of data requests, instead of doing this in the form of EFIS, you know, things that are not

visible to the Commission, let's just air it out. Let's either have a hearing where Evergy provides distribution personnel, you know, let's do it in the form of filings rather than, you know, the back half of EFIS. Let's just ask the questions and Evergy can either answer them or say here's the question you should ask instead. Frankly, I hope there's some where Evergy says here's the question you could ask instead because they have better access to this information. Again, the big issue in this case is is it really about, finger quote, secondary, finger quote, primary, or is it about 120 KV/240 KV versus 12 KV.

- Q. Let's talk about this case. In this case, and I think you mentioned it yesterday, you filed about 200 data requests for both companies in this docket, right?
- A. The numbers speak for themselves. I think it was 132 unique.
- Q. There were 185 and then you followed up. There were around 200 total I think. Would you agree with that? Whatever. It doesn't matter. You filed a lot of data requests in this case, right?
- A. A lot is relative. I mean, this issue was pushed out of the rate case because it was so data intensive. So I mean, I asked the right amount for the subject matter.

- Q. Okay. You asked that those data requests be turned around in 10 days, right?
 - A. I think the Company agreed to that.
 - Q. We did.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- A. And not all data requests were provided within ten days. I believe every single data request was objected to.
- Q. In some cases you asked for ten years worth of data on numerous plant accounts, right?
- A. I did. I asked for the work papers for your FERC Form 1s for ten years for the distribution plant account so I could prioritize which accounts merited further study and which accounts were showing slow enough growth or were small enough balances that they were lower priority.
- Q. And I don't really want to burden the record with a list of all of the data requests where you asked for ten years worth of accounts, but would you agree it covered an awful lot of distribution plant?
- A. It discovered the distribution plant, yes. There are, I think, 12 distribution accounts.
- Q. They're numerous DRs asking for ten years worth of data. I think it's all reflected in our response to the motion to compel. So I won't go through that on the record.

Page 309

- 1 MS. KERR: Do we have a question?
- 2 MR. FISCHER: Yeah, there's one coming. I'm
- 3 | sorry.

11

12

13

14

15

16

17

18

19

20

21

22

23

- 4 BY MR. FISCHER:
- Q. On page 18 at line 2, you state Staff
 recommends this docket be used as a means to resolve
 areas where Evergy asserts that it cannot provide
 requested data because production of this data would
 require Evergy to perform additional analysis; is that
 right?
 - A. That is what it says. That is my recommendation.
 - Q. So is it correct that Staff's recommending that this docket remain open so that Evergy -- or so that Staff could request Evergy perform analysis in areas where the data or the analysis does not exist?
 - A. Well, I think Evergy's testimony from the time of Mr. Lutz's rebuttal in the 129 case is that none of this exists. So obviously yes, Evergy's position is that none of this exists or we wouldn't have entered a stipulation.
 - Q. And this wouldn't be tied to a particular proceeding or not a rate proceeding. It would be open ended?
- A. I'm happy tying it to the concept of -- Now,

Mr. Luebbert has a separate recommendation, but this
recommendation concerning distribution data I would love
for us to either have common ground or agree on a set of
alternatives that maybe we have one position, the Company
has another, perhaps MECG and OPC have a third and fourth
but where we could get that data straightened out and be
done with it for another decade or two.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

2.2

23

Α.

- Q. My question was more about what proceeding. It would be an open-ended proceeding just whenever you wanted to request the data you could do that. Wouldn't be tied to like our next rate case or anything else. It would just be an open ended or perhaps it would continue to keep this docket open. Is that your what you're suggesting?
- A. Yeah, that's what I just testified that the idea would be that we come up with common ground recognizing agreement to disagree on these price components that are in Evergy's existing rate structure.
- Q. So if the Commission accepts your recommendation to leave the docket open, would you anticipate filing motions to compel like Staff filed in this case if we didn't answer something to your liking?
- MS. KERR: Objection. Asking for legal analysis.

As I said, my --

1	JUDGE HATCHER: That does seem a little
2	speculative, Mr. Fischer.
3	THE WITNESS: Can I answer? I already It's
4	what I said earlier. I think a better way to do it would
5	be to file. We would file and say hey, what can you give
6	us for ten grand and Evergy could answer that.
7	MR. FISCHER: Judge, I'll withdraw that.
8	BY MR. FISCHER:
9	Q. Let me ask you this question then. Let's
10	assume that the Staff files a motion to compel in that
11	kind of a scenario. Would the Regulatory Law Judge,
12	Judge Hatcher, somebody in his position, be expected to
13	decide whether it's cost beneficial for the Commission to
14	order new data be created and produced?
15	MS. KERR: Objection. Same objection. He's
16	asking for speculation and for legal analysis. She
17	doesn't know what the Judge would decide.
18	MR. FISCHER: Judge, there's no legal analysis
19	in that question.
20	MS. KERR: She still can't testify as to what a
21	Judge would decide.
22	JUDGE HATCHER: I didn't hear that that was the
23	question. What I heard was would somebody in my position
24	be the one making that decision.

MR. FISCHER:

That's right.

That's the

1 question.

JUDGE HATCHER: You can answer. Objection overruled.

forward that the Report and Order addressing this phase of the EO docket or at least I guess an interlocutory order addressing this phase of the EO docket, which now that I say that is probably the better way to do it. You'd have an interlocutory order setting out how this would be handled going forward and then a final Report and Order, if necessary, which in an EO docket I don't know that you need one, could draw any conclusions where the participants have had an opportunity to weigh in on the relative costs and benefits of proceeding with a given line of data acquisition, which is what's contemplated in the prior Stipulation and Agreement.

BY MR. FISCHER:

- Q. What criteria under that scenario in your opinion would the Regulatory Law Judge use for deciding
- 20 whether Staff's data requests were cost beneficial?
 - A. I can't answer that. I would defer to my prior answer. Well, I would actually say I hope it doesn't come to that. Based on Mr. Lutz's testimony yesterday, it seems to be across the board recognition that something needs to be done, the existing rate schedules

- have no real relationship to existing costs, so let's just figure something out.
- Q. If we leave the docket open as you were suggesting, isn't that the likely occurrence we're going to have to come before a Regulatory Law Judge to say is it cost beneficial for us to create this new data that doesn't exist?
 - A. I hope not. I hope we can work it out.
- Q. Let's turn to page 40 of your rebuttal testimony. And at line 7 you state Evergy's responses to Staff data requests in this case reveal that Evergy did not undertake a good faith effort to comply with the commitments made in the 2022 Stipulation and Agreement; is that correct?
 - A. That is correct.

- Q. Are you testifying today as you sit here that you do not believe Evergy is operating in good faith in this case?
- A. This statement is much more specific than what you have just said. This is referring to the response to item 1, distribution expense information, where Evergy committed to provide item by item and instead provided a lump item for all of those separate items and that is what this statement is about.
 - Q. Okay. So you're talking about all those data

requests that were filed in this case that we didn't do a good faith effort to answer those data requests?

- A. That's not what this says, no. That's not what I'm saying.
 - Q. What are you saying?

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

A. So I recall, and I hope that this is laid out clearer in the written testimony, but I'll attempt to summarize here. So item 1 goes from things like meters, which are probably pretty easy to come up with cost by voltage relatively speaking, all the way to things like extension costs which may be reliant on virial documentation that may be very cost prohibitive and a relatively low benefit to getting greater information on.

We asked in data requests what is your estimate of the cost to provide line transformer costs and expenses by rate code. Separate data request. your estimate of the cost to provide primary distribution costs and expenses by voltage, and so on, and so forth, separate data requests for each one. There was then a set of data requests where I thought well, maybe they would do it by plant account. So I asked those same questions, what is your estimate of the cost to produce the estimate of the differentiation between primary voltage and secondary voltage in the overhead conductor Separate data request. The underground account.

1	conductor account. Separate data request. The poles $ {\ }$
2	account. Because there's two ways you could get at it,
3	right. You could look at it as what are the whole system
4	costs or going account by account what are the costs.
5	Evergy's response to those data requests was
6	that's not what we did, we can't answer this. We don't
7	have a cost estimate to do these items that are in item
8	1. That's what I am referring to in my testimony on page
9	40.
10	Q. Okay. So you're saying as you sit here today
11	Evergy did not undertake a good faith effort to comply
12	with the commitments made in the 2022 Stipulation and
13	Agreement?
14	A. This testimony refers to item 1.
15	Q. It refers to commitments made in the 2022
16	Stipulation and Agreement, as I understand it.
17	A. The question says
18	MS. KERR: I think she's asked and answered.
19	This question has been asked and answered.
20	MR. FISCHER: I'm sorry. Go ahead.
21	JUDGE HATCHER: I'm waiting to see if your
22	witness volunteers another answer on her own.
23	THE WITNESS: The question that he is reading

testimony in this case provided estimates of the cost to

an answer to is to what extent has Evergy's direct

24

- provide the distribution and expense information, Not all of the information in this case. It is very clear in the question what components I'm referring to. I stand by that testimony. I don't think that Evergy complied with the stipulation.
- Q. So you're talking about mostly the data request answers that we provided?
 - A. No, I'm talking --

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Q. Or about the testimony we provided in this case?

If I could interject. JUDGE HATCHER: potential miscommunication, an honest miscommunication. I believe your question in your testimony limits it to distribution and expense information. However, the first sentence of your answer says the not good faith and then the second sentence says specifically and returns back to the distribution. And then the end of your answer clarifies that that question 1 of the Lange requests, request No. 1, which was a combination request in your testimony, is now broken out into these. However, I think the miscommunication is in line 7 where it says, and I'm starting in the middle, and Evergy's responses to Staff's little d, data, little r, requests. confused whether we're referring to actual DRs or the Lange Request No. 1.

THE WITNESS: May I clarify? This discussion
is referring to stipulation provision 1. The data
requests referred to in line 7 and 8 are, in fact, little
d data requests, discovery promulgated in this case
because Evergy didn't provide a work paper at all
concerning BDL-1. So what I really hoped would happen
and what I was optimistic would happen when I propounded
discovery in this case related to this issue is that
instead of it being a lump sum of 80 million to 110
million we would get responses back from Evergy that said
we looked at it one of two ways, which is why I had to
ask two sets of data requests, and we think figuring out
meters is probably going to cost, you know, \$5,000 or
some amount.

That's what I hoped would happen is that Evergy would effectively provide how they came to this 80 to 110 million value. Instead what the responses to the discovery in this case as referenced in line 7 and 8 said is that that is the number, there are no work papers behind it, there is no report behind it, there is no verification of we looked at each of these items separately and here's what we think it would cost to do this and this and this in any kind of additive manner and presumably going account by account would have been -- So the way these are laid out in stipulation provision 1 is

- 1 sort of concept by concept but presumably to come up with
- 2 | how to calculate what they committed to provide in item
- 3 | 1, they would go account by account through those 12
- 4 distribution accounts.
- 5 MR. FISCHER: Thank you, Judge. Should I
- 6 | continue? Thank you.
- 7 BY MR. FISCHER:
- Q. Ms. Lange, is there another case pending before the Commission, and I'm thinking of EC-2024-0092, where the Staff is requesting the Commission order the Company to produce the same information that you're seeking in
- 12 | this case?
- A. I don't recall whether or not there's a

 specific relief requested in the complaint case. Direct

 testimony has not been filed in that case. I don't

 recall the relief requested. And to the extent that

 relief was requested, I believe it would be related to

 the filing of direct testimony.
 - MR. FISCHER: Judge, could I approach the witness?
- JUDGE HATCHER: Yes.
- 22 BY MR. FISCHER:

20

Q. I'd like to hand you a copy of the Staff's

Amended Complaint and Count I that deals with this data

retention case. There on paragraph 15 don't you include

in the Staff complaint all of the data that you've requested in this case?

- A. It recites it. Again, I don't recall the relief requested in the complaint if relief is requested.
- Q. Since you've got the document, would you turn to the wherefore clause and just read that.
- MS. KERR: I'm going to ask about the relevance here.
 - MR. FISCHER: I'm just pointing out that Staff has another case pending that's asking for the same data that she's requested in this case.

JUDGE HATCHER: Overruled.

THE WITNESS: The wherefore clause reads Staff prays the Commission will give, and this is the wherefore clause concerning Count I, I'm sorry, wherefore, Staff prays the Commission will give due notice to the respondents and, after hearing, (1) order that respondents forthwith comply with the stipulation order of October 2, 2022, and the stipulation and agreement of August 30, 2022, providing the above enumerated data to Staff or explaining why it could not; (2) direct its General Counsel to seek appropriate penalties from Evergy as authorized by law; and grant such other and further relief as is just in the circumstances.

MR. FISCHER: Okay. Thank you.

BY MR. FISCHER:

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

- Q. So would you agree that the Staff is asking for that same data in that case that you're asking for in this case, the same enumerated data that you recited?
- A. I'm not the attorney who prepared this complaint.
- MS. KERR: I'm going to object asking for a legal conclusion.
 - JUDGE HATCHER: I would disagree that it's a legal conclusion. Maybe Mr. Fischer could point to a paragraph.
- MR. FISCHER: I'm just asking whether the enumerated data that they're asking be produced is the same enumerated data that she's requested in this case.
 - JUDGE HATCHER: I'm with you and I'm anxious for an answer. However, the paragraph that you had her read doesn't say that.
- MR. FISCHER: Okay. Maybe not.
- JUDGE HATCHER: I'm really hopeful --
- 20 BY MR. FISCHER:
- Q. Let me ask you that question then just straight up.
- A. The question is, is the data list the same?
- 24 Q. Yes.
- 25 A. I hope so barring any typographical errors.

1	Q. Okay. Great. Assuming that the complaint case
2	goes forward, we're going to be back in the hearing room
3	for us to explain to you why we can't produce it and how
4	much it would cost, right?
5	A. I can't answer that question.
6	Q. Okay. That's fine. Staff also alleged in that
7	Staff Amended Complaint that Evergy violated the rate
8	case order in other respects too; is that right?
9	MS. KERR: Objection.
10	JUDGE HATCHER: Yeah. Mr. Fischer, your
11	response.
12	MR. FISCHER: I haven't heard what the basis of
13	the objection is.
14	MS. KERR: The relevance, asking for a legal
15	conclusion.
16	MR. FISCHER: Let me get more specific I guess.
17	MS. KERR: What does that have I mean, what
18	does that have to do with this case.
19	JUDGE HATCHER: Let's let Mr. Fischer continue.
20	MR. FISCHER: I'll withdraw that question,
21	Judge, and just ask
22	BY MR. FISCHER:
23	Q does the Staff complaint also allege that
24	Evergy did not meet with stakeholders to discuss rate

modernization within 180 days of the tariff effective

1 | date of the last rate case?

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

2 MS. KERR: Objection.

JUDGE HATCHER: I'm going to allow it because we had the very brief discussion on the 180 versus the 190, which did raise the temperature in the room and I would like to avoid that. However, we have already opened that door. I would prefer to keep it short. I get the point. But objection overruled.

THE WITNESS: So to clarify, the issue is a lot less with the ten days difference and a lot more with the content of the presentation. Does that answer your question? And that's what the issue is is addressed in the complaint as I recall.

BY MR. FISCHER:

- Q. That wasn't my question but that's okay. It's not so much about the ten days that we were late, but it's the fact that we didn't have additional conversations about rate modernization?
- A. The complaint is the complaint. From my personal perspective, if we had met at 190 days and had a good conversation about what the Commission directed that conversation to be, personally I wouldn't have had a problem with it.
- Q. Let me ask you the question I asked you earlier. Do you know did Evergy ever indicate to the

Staff that they were unwilling to continue rate modernization discussions?

- A. Again, I don't think Mr. Lutz, you know, told me to never talk to him again, but no fruitful discussions have occurred to get eye to eye with what Evergy's brightlines proposal is, and by brightlines I'm referring to how Evergy has termed its view of rate modernization, but we have not had productive discussions or I should say we have not had meaningful discussions from Evergy since the last rate case if not before about what Evergy wants to do with its nonresidential rates.
 - Q. Or since the Staff filed its complaint, right?
- A. No, we had a meeting. I mean, we had the Staff meeting after that. Again, the timelines are fuzzy to me. The last 14 years have been a blur at this point with rate case activity.

MR. FISCHER: The record will reflect those dates so we don't need to go there. I think it was two weeks after the last conversation. I appreciate your candid responses. I apologize if I turned up the heat at any point. That's all the questions I have.

JUDGE HATCHER: Thank you, Mr. Fischer.

MR. CLIZER: Real quick. It was flagged to my attention that I did not move to admit OPC 305, and I wanted to take a moment to do that before we got too far

Page 324 1 afield. Apologies to interrupt the order. 2 JUDGE HATCHER: You're fine. 3 MR. CLIZER: That would be the Commission's 4 Response to Staff Report Regarding Distributed Energy 5 Resources filed April 18, 2018 in Case EW-2017-0245, 6 which again I have marked as OPC Exhibit 305 and I move 7 to admit. JUDGE HATCHER: 8 I think you are correct. Ι 9 don't think we did that. You've heard the motion 305. 10 This is from EW-2017-0245. It's two pages Commission's 11 Response to Staff Report Regarding Distributed Energy 12 Any objections to the admission of Exhibit Resources. 13 Hearing none. So admitted. 305? 14 (OPC'S EXHIBIT 305 WAS RECEIVED INTO EVIDENCE 15 AND MADE A PART OF THIS RECORD.) 16 JUDGE HATCHER: We are back on Ms. Lange's 17 We will go to Commissioner and Bench testimony. 18 questions. Before I ask for Commissioner questions, I need an exhibit, please, from Staff. I would like the 19 20 attachment to the motion to compel. There are 16 pages I 21 believe labeled as Attachment A that are the data 22 requests sent from Staff to the Company. I'll give a 23 deadline for that like a week or so in advance. 24 That's just for the future I'll need that. I'm

Thank you, Mr. Clizer.

25

sorry.

Okay. With that done, let me also mark down or	1
my list and assign that a number. Ms. Kerr, are you okay	7
with me assigning this to Staff's numbering, 219,	
otherwise I can assign myself a number and I'll take care	5
of it myself.	

MS. KERR: That's fine.

JUDGE HATCHER: 219 will be Attachment A to the motion to compel that was in this case. We'll deal with the admission as a late-filed exhibit. Commissioner questions. We'll start with Chair Rupp.

CHAIRMAN RUPP: Thank you, Judge. Morning still. Good morning.

QUESTIONS

BY CHAIRMAN RUPP:

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

2.2

23

24

- Q. Following up on you made a statement that the same consultant in the Ameren case as in this case has been utilized and the testimony in the Ameren case was that the continuing property records do not accurately reflect what's going on in the market. Can you explain to me why that is important?
- A. I'll do my best. The reference consultant is Mr. John Spanos. So at the time that the list that became the stipulation was written in my direct testimony Staff didn't know about the extent of issues with the continuing property record. That's first and foremost.

How this is done in a rate case, this being distribution
system, functionalization and classification, what Evergy
and other utilities do and Staff largely does as well,
although we'd have to rely on utility data, is go account
by account, and by that I mean distribution account. So
using overhead conductors and devices as an example.
Hopefully somewhere the utility will have a work paper.
They don't in every case, but in many cases the utility
will have a work paper, where they went to the continuing
property record for a distribution account and they
represent that the person conducting the class cost of
service study had a discussion with in-house distribution
personnel about one of two things and one of the
things that those typically are is by retirement unit in
the continuing property record what is the smallest most
frequently utilized piece of property for that account or
alternatively what are a set of frequently installed
retirement units of various sizes from which they can
perform a regression to determine what the conceptual no
load item would be for that account and now this varies
by utilities and conductors and devices as an example.
You might do this just for conductors.

So for example, the utility might represent, again this is seldom if ever in testimony but often we learn this through data request responses, that the

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- utility will represent that they spoke to a line engineer and line engineer says we're using, I'm going to make up a retirement unit name, Aluminum No. 50. Aluminum No. 50 is what we use for everything. And so then the person performing the class cost of service study for the utility will say if all of the line miles that we had were built at Aluminum No. 50, here is what the system would cost based on the feet of other line miles that are in the continuing property record. Now, you get into an issue of the average cost of that again hypothetical Aluminum No. 50, and as Mr. Lutz said yesterday, that's often done at embedded cost. So if the continuing property record is showing the wrong items in the plant accounts, the dollar accounts, from the items that are actually out there in the field, then what your study results tell you aren't particularly helpful because what you've developed is the historic average cost based on non-historic numbers or numbers that no longer reflect reality. So I hope that answered your question.
- Q. So how does that impact customer and customer rates?
- A. So where you go from there is that that would be the step that's used to classify what the Company calls the customer allocated portion of the distribution system. Then they'll be another step that occurs where

Page 328 1 they functionalize. Again, different utilities call it 2 classification versus functionalization on a specific 3 issue, but essentially what you do, what the Company does 4 in a class cost of service study, and the class cost of 5 service study is presented for the last 18 years, is the 6 Company says if we took each of these roughly 12 7 distribution accounts and said here's the portion that 8 would exist no matter what demand any given customer has 9 just by the existence of there being customers, here is a 10 dollar value and we're going to allocate that to the 11 classes based on the number of customers in the classes. 12 They then for each of those roughly 12 distribution 13 accounts would say based on discussions with our system 14 engineers and other information that we are not including 15 in testimony and may or may not provide in work papers 16 and may or may not be based on data that's one year old 17 or 30 years old, here's the amount that we think is 18 secondary related and primary related but not customer 19 related. And so that is what goes into the CCOS for 20 allocation to the customer classes. 21 Now, it affects customer rates on another 22 level, as Mr. Lutz touched on yesterday, in that Evergy 23 -- I apologize I'm talking with my hands which the court

reporter won't catch -- but I'm pointing to the important So Evergy within a rate class has different parts here.

24

sets of rates based on the voltage at which customers are served and those are the rate codes. So if you are an MGS customer served at primary, you will pay different rates than an MGS customer served at secondary.

What should be happening at some point, perhaps not in every case and definitely giving considerations for customer impact and the level of precision and imprecision inherent in CCOS studies, that what needs to be happening from time to time is saying is that difference between what these two identical customers are being billed for the same service where the only difference is if they are taking service at secondary or at primary, is that difference just and reasonable to an extent that you can find somebody on Staff willing to sign an affidavit. That's how it impacts. That's the two ways it impacts rates.

- Q. The information of which you had requested from the Company, if you got all the information that you had requested, would that eliminate the need to do a class cost of service study every rate case?
- A. So I think we're talking about item 1. Item 1 is referring to the distribution system. So there's a lot of elements that go into a class cost of service study other than the distribution system. What Staff has tried to do is you do a deep dive into the distribution

- system. When you start having concerns, you keep an eye on it to know when you're having concerns but that you do not go in depth on this in every case. It's a huge undertaking.
- Q. So would having this information in number 1, would that alleviate the time that Staff has to devote to coming up with its position for just and reasonable rates during a rate case?
- A. It would take us back to status quo where we could rely on the information. Again, you do this every couple of decades. So in those cases in the 2010s -- I'm sorry, whatever we're calling the aughts I guess, we didn't do a deep dive in the distribution system because it had been done in the '90s. So it gets us back to status quo I guess.
- Q. So it's not necessarily a time saver or an elimination of work on Staff's behalf. I'm hearing you say it's more of a confidence in the data that the end work product would be more accurately reflecting the current situation?
 - A. I think that's fair.
- Q. Okay. Yesterday if you were here for Dr.

 Marke's testimony from OPC, he had advocated doing a

 distribution study for Evergy and their companies and I

 think then he later said in addition to the continuing

property records update, if those two things were completed, what would Staff still be lacking that you feel you would still need data to do your job the most effectively?

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

So, and I apologize because I use this term in my testimony too, the phrase distribution study is probably too vague to be something to put in an order. Would probably need to put tighter lines around it than I would see that being done in one of two ways and this is relevant. I have to say these two ways to answer your question. If we did this by cost categories, and by that I mean if we said, you know, kind of an approach of saying you have this many miles of line that operates at this voltage, what's the cost per mile. If we went that route, I would expect I would issue a DR in each rate case that would say please let us know based on discussion with your engineers if the relative values determined in Case XXX have changed. If so, provide So that's what I would expect would happen if we update. went the route of kind of item by item which frankly at this point would be my preferred route.

Assuming the Company said no, pretty stable, it still costs a lot more to build primary than secondary or it still costs a little bit more, you know, there's going to be judgment calls in how much it's worth dealing with,

but that's the sort of thing we rely on the utility's
representation all the time. The second route would be
plant by plant with an updated continuing property
record. Understanding that decision to pursue this order
for relief that's got pursued with Ameren, to pursue that
same relief with Evergy, I am not the person to make that
decision. But if that is something the Commission orders
is that Evergy do the sort of thing that's continuing
property record that it's ordered Ameren to do with its
continuing property record, then we would do the same
sort of thing that we did in cases from the aughts and
early teens which is we would look at what they file in
their work papers and if it's not so different that it's
shocking we would just use their numbers. I hope that
answered your question.

It really is a -- Knowing how much money is getting dumped into the distribution systems right now under the PISA legislation, the plant in service accounting legislation, the capital investment plans, it's hard for me to say everything is going to be hunky-dory for the next 20 years because we don't know what's going to change in the next 20 years, but it would be my hope that if we can get common ground on the values for the sort of things that are set out in item 1 that we'd be set for another ten to fifteen years or possibly

more.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- Q. You had also stated in your conversations with Company counsel that you were able to get sample customer data from the other electric utilities Ameren and I believe you said Liberty said they could supply that.

 Can you explain what you're getting from those utilities?

 Can you just expand on that?
- So when I refer to sample customer data, what I'm talking about is, as discussed with Mr. Clizer it's going to depend on the size of the class or the subclass, but if I say, you know, Ameren, I need a hundred residential customers to look at bill impacts, Ameren's response has been do you want it on a CD or on a share And so what that is is what each customer point site. used in each of 8,760 hours at a minimum, I think sometimes they've actually given us three years but I'd have to, not 100 percent sure on that, but that's what I mean by sample customer data is what is a customer's usage over the course of a meaningful time period and then for other classes that would also include what is 15-minute billing demand data related to that customer. And that has in the past with Ameren I believe we've gotten that for large power customers but not necessarily But again, Ameren hasn't completed all customer classes. their AMI deployment the way that Evergy has.

Q. You stated that Liberty from your recollection stated they could supply you that information if requested?

- A. My recollection of the conversations with Liberty on the sort of items covered in 2 through 8 was they looked at me like I had two heads for thinking why is it a question. Of course we could provide this. This is what we're doing internally. This is what we need to do, what we're doing. They were concerned why we wanted it in a stipulation, what was the catch.
- Q. So based off of your experience of working with the three largest electric utilities in the state, would you agree with previous testimony, I believe it was Dr. Marke from OPC, as he categorized the reluctance or inability or difficulty of getting information from the Company boils down to culture?
- A. I've been involved in conversations to get load research data, hourly class information, rate code information from Evergy since at least 2012. And where those conversations were in 2012, and this is answering your question, where those conversations were in 2012 is we'll be getting AMI soon, let's just put a pause on this because once we have AMI, of course, we can do this.
- When 2014 came around, it was we're really focusing on aligning -- I know you recall, other

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Commissioners may not have been part of this or been aware of this, so the consolidation of the rate districts at what is now Evergy Missouri West was a big deal. And so that put a pause on providing good load research data to Staff. When that picked back up, Evergy was in the midst of its transactions with WestStar. At that time, Evergy's discussions around load research data, class hourly load data shifted abruptly.

I recall having a conversation with Evergy personnel saying, you know, what did we need, how do we need it, and I looked to Al Bass, Al Bass is the person who does this for Evergy, and said Al, what are you asking for, you know, because it does come down do we want it by month, do we want it by billing cycle. There's all sorts of detail. I recall saying Al, tell us what you're asking for and if it's -- I'm going to bet it's the same thing. If it's not, I bet we can work with what Al is asking for. And the response from Evergy was we're tied up with WestStar, Al is not getting anything And that has been my experience on the for years. customer and usage information from Evergy from that time forward is that there's always something else that's a higher priority and they just can't do it yet but some day we'll get around to it. And I think that that's what the testimony in this case was. Mr. Lutz said yesterday

that yeah, it would be nice to have this by rate code but it's not a priority.

1

2

3

4

5

6

- Q. I believe I asked Mr. Lutz has any other state adopted a similar methodology to which Staff was proposing to use. I think he stated that it did not exist at any other PSC to his knowledge. Would you agree with that?
- 8 So this is where what it is is confusing to me. 9 I appreciate the reference. I'm not aware of a 10 jurisdiction, especially in light of PURPA, PURPA 78, 11 that doesn't look for cost causation in any rate 12 differences that treatment of similarly situated 13 customers. So if that's what we're talking about, I'm 14 not aware of a state that doesn't do that. If what we're 15 talking about is the whole kitten caboodle from the 16 EW-2017 case of where Staff said hey, here's the timeline 17 of, you know, if the Commission really wants to 18 prioritize bringing DERs on line, here's where we ought 19 to be by the end of the 2030s or whatever that timeline 20 I know we refer in that docket to the Indiana model 21 but I don't recall the details particular to other states 22 and frankly I haven't had the time to look at it since 23 2017.
- 24 CHAIRMAN RUPP: That's all I had, Judge. Thank 25 you.

1	JUDGE HATCHER: Commissioner Hahn is going to
2	have a few questions. I did want to just make sure that
3	everyone is aware we are going to break at 11:30-ish
4	trying to accommodate Commissioner Hahn's questions. We
5	will be returning though with Ms. Lange for Commissioner
6	and bench questions. Let me ask Let's go ahead and we
7	will pause on the questioning for now. We'll return with
8	Commissioner Hahn, she has dibs first, and then
9	Commissioners. We have agenda You all have agenda at
10	noon. I was thinking of giving you all an actual hour of
11	lunch until 1:30. We're in the last four witnesses. I
12	think Ms. Lange is probably the major witness here.
13	1:00? Let's go 1:00. Okay. Where are we at?
14	MS. KERR: Judge, I have your copies of the
15	Attachment A if you want that. I could just bring that
16	up afterwards or after we adjourn.
17	JUDGE HATCHER: Yeah.
18	MS. KERR: Okay.
19	JUDGE HATCHER: Change of plans to everyone
20	listening and in the room. You probably heard some of
21	the side conversation. We are making sure our technology
22	coordinator is going to take care of agenda. We're going
23	to go until about 11:40-ish. Commissioner Hahn, go
24	ahead.
25	COMMISSIONER HAHN: Thank you. My apologies

for the back and forth there shortly.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1

QUESTIONS

BY COMMISSIONER HAHN:

I'm going to maybe pick up and ask some of the 0. things I asked yesterday of Mr. Lutz and some of the questions just previously asked by Chair Rupp. yesterday I did ask Mr. Lutz about the data requests or the amount of information that he believed the other electric IOUs do provide to Staff. I asked, you know, I'm summarizing from yesterday, do you think that the other electric IOUs have to provide this information and his response, and again I'm summarizing, was that he didn't to his knowledge think that the other utilities had been subjected to these particular nine questions and that there had been some difference and distinction in what had been asked by different utilities. Can you respond to that, what your knowledge is of what the other utilities provide at a broader level and give me some context for his remarks?

A. Sure. So turning first to Liberty, because it's the easiest one, as far as the items covered in 2 through 5, Liberty, you know, was -- I don't recall if we have a literal stipulation provision with them or if Mr. Dolges (phonetic spelling) communicated that they could retrieve that from the data legacy and it wasn't an

issue.

- Q. Okay. That's important. They have a data link and they can provide 2 through 5, to your knowledge?
 - A. That's what they represented to us.
- Q. Thank you. Do they provide that regularly or just in rate cases or how often?
- A. So we don't need it unless we're doing a specific rate design case which might occur outside of a general rate case or a specific MEEIA case. What we need this for is in a rate case for the three relevant periods but not outside of those instances.
 - Q. Got it. Okay. I'll let you continue.
- A. So on the distribution type data, and we got a little bit better at wording some of these things I think to maybe clear up some of the just sort of inherent vagueness or potential for misunderstanding, but there's nothing substantially different between the discussions with the other two utilities from Evergy. Sorry. I'm jumping around in my answer here.

That said, as far as distribution type data, we've had early discussions with Liberty coming out of the last rate case about the sort of information we would need to see going into future rate cases and I would characterize it as a general agreement to disagree. You know, they're not necessarily committing to proposed

Page 340

- things the way Staff may propose them but that I think we're more or less on the same page as to what data would be provided.
- Q. When you say "distribution type data," is that the type of data that would be in your number 1?
 - A. Yes, stipulation provision 1.

- Q. Okay. So they also haven't yet provided it?
- A. We haven't gotten to a rate case. To be clear, we're not asking, and I don't know how anyone with a background in this material like Evergy has, would read item 1 to say we literally want you to reinvent your books and records. That is not the intention to the extent that's been. So I'm not saying that Liberty has redone its books and records because that's not what we want and that's not what we're asking for.

With regard to Ameren, we're engaging in very productive discussions regarding item 1 and they've been -- again, they're not necessarily and I wouldn't expect them to commit to what they're going to propose in future rate cases for actual class cost of services, but they are very open to the discussions about what kind of data we need to do what we need to do.

Now, as regarding the customer and usage information, Ameren is at a different point in their AMI deployment than Evergy, and I'll be honest I don't recall

2.0

January 31, 2024

- what they've literally said they can do today because they still have 10, 15 percent of customers who aren't AMI. I think where we are with them is conceptually similar to this discussion of saying, you know, how many do you have that are AMI metered, are they, you know, fairly representative of the remainder that are not AMI metered and do the math to extrapolate it. I think that's where we are, but I would defer to that order for the details, that being the rate case order in 337.
 - Q. Okay. So in my mind from your testimony just now, it seems like there's a mix amongst the utilities of what they said they can provide and what they have provided and when it's kind of needed as in some of the information from the other utilities hasn't been provided yet but they're potentially working on providing it in a future case?
 - A. I believe that is the agreement with Evergy and the order with Ameren, and some of the data has been provided with Ameren. We recently had a really productive discussion with Ameren about noncoincident peak in particular.
 - Q. Also yesterday at the very last question I asked of Mr. Lutz was that did he believe that this data was needed by Staff in a rate case and he responded that this data is, I'm summarizing, needed to support Staff's

rate design request but was not needed to support Evergy's rate design. Can you respond to that?

A. I can. And this is where it's important to remember there are three or four really different pieces of information at play here. So picking out the distribution data first, we are at a point given the staleness of data and given as Mr. Lutz described yesterday the departure of the existing rate relationships over time due to stipulations and various orders, we're at a point that we've got to check those relationships.

I am no longer comfortable saying equal percentage is fine with regard to the rate design aspects where within MGS, LPS, SGS customers are getting charged differently based on nothing more than whether or not they're all electric and based on nothing more than the voltage at which they're served. We're at that point, and it is a point you reach gradually. That's for item number 1.

For the customer and usage information, there's a lot of baggage around the deployment of time of use rates. I'll be blunt. The Commission did the opposite of what I told them to do and then came back and did what I told them to do but at a time that I said you just can't do this now, it's going to make a mess of things.

That's the best way I can characterize it. That's where we are. We can't ignore that 15 percent of customers for the residential customers are paying really, really, really different rates. We can't ignore that the intent of those rate designs that I testified in the last case were not cost-based. They were designed to induce changes in customer response to weather.

I'm not the Staff person who's going to be signing off on an affidavit regarding weather normalization, weather responses and billing determinants in the next rate case, but you'll have an opportunity to talk to him here in a minute. But if I were, I couldn't say that we can ignore, we can purposely ignore how different the time of use situation makes things on the residential side.

Now, this also relates to those disparities for all electric versus general service customers on the commercial and industrial side. They're getting charged really different rates based on their end uses, based on assumptions that were made in the '90s about the cost of energy over time. That was before the SPP integrated marketplace. It was a very, very, very different world. I mean, especially looking at renewables today. That relationship has been turned on its head in the RTO and in the area in which Evergy participates. We have to

look at how those customers are being charged differently
and say is it reasonable or not. Personally I don't
think it's reasonable but here's where we have the
problem of we have to see what that customer impact is.

We can't just say it's not reasonable, get rid of it,
unless the customer impact is minimal or is within a
realm of reasonableness.

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- That's where this third thing comes in of the sample data of we have existing rate disparities related to the time when customers consume energy, and Evergy's position that we saw in that DR response of it's not a problem in the rate case because we're just ignoring it, to me that cannot be an acceptable answer for the Commission.
- COMMISSIONER HAHN: I have more questions, but I think we need to pause.
- JUDGE HATCHER: We're at our two minutes before our preannounced adjournment time of 11:40. Let's go ahead and call it. We will go to recess until 1:00, until 1:00. Off the record in a recess.
 - (The noon recess was taken.)
- JUDGE HATCHER: Let's go on the record the time having expired for recess, lunch and agenda. We are returning stating for the record this is again Regulatory Law Judge Charles Hatcher. This is File No.

Page 345

- 1 | EO-2024-0002, and we are in the middle of testimony from
- 2 | Staff Witness Sarah Lange and in the midst of
- 3 | Commissioner questions. Commissioner Hahn had the floor.
- 4 Please continue, Commissioner.
- 5 COMMISSIONER HAHN: Thank you. Thank you, Ms.
- 6 Lange.

8

9

10

11

12

13

14

15

16

17

18

19

20

21

- 7 BY COMMISSIONER HAHN:
 - Q. I'm going to start down a different line of questioning that I also asked Mr. Lutz about yesterday. Yesterday I had asked Mr. Lutz about, you know, level of communication potentially before this hearing. I can't remember exact question I asked. Can you tell me about the level of communication you had with Evergy prior to this hearing today and trying to reach a resolution and what was the outcome of that. From the testimony that I read, it seemed like there was not great communication between the data that was provided and what Staff expected the data to be. Can you talk about that communication prior to the hearing today?
 - A. Yes. And to be clear, do you mean from the time of direct testimony to the hearing or do you mean leading up to the filing of direct testimony?
- 23 O. Prior to that as well.
- A. Sure. I think I mentioned this a bit this
 morning. Based on the conversations that occurred around

the time of the stipulation in the rate case, and again
I'm not trying to talk about privileged settlement
discussions, but this one it's difficult because there's
an overlap of technical issues and settlement issues.

But I thought the -- I thought we were getting towards the same page on the sort of information that Evergy would be able to provide understanding there may be some items where they said we just can't do it, it's going to cost a ton. Apologize for the ambiguous phrase of a ton but, you know.

I thought based on the conversations that were occurring last fall or fall of '22, yeah, fall of '22, I'm sorry, based on the conversations in fall of '22 and the fact that these conversations had been coming up in dockets and rate cases for the past decade, I really expected we were going to get hey, we think it's going to cost a few grand to do a pole study or hey, we did a pole study and here's the result.

I really, really expected that information to be filed around July 1, and I was literally shocked when Evergy's answers was none of this can be provided; that there's incremental cost doing every element of this.

Mr. Lutz referenced in his testimony that alternative data may be suitable. It would have been great if they would have told us that ahead of time and we could have

talked about that alternative data because, again, I thought for item 1 that's what we were looking at.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Items 2 through 5, there's been communication on that going back probably close to a decade now. There had been no additional communication from the time of the stipulation until Mr. Lutz's direct filing. Again, I thought it was pretty clear at that point what the information is given the history of the case. So I wasn't surprised that I didn't get questions from Evergy between fall of '22 and July of '23.

And so then during the case, you know, yeah, there are a lot of data requests and part of the issue we've run into this and I'll try not to go on a general, you know, if I were king of the Staff type thing here, we do have issues with information kind of getting buried in So to the extent that we have a question of a emails. company and there's an open case on it, we do it as a So I mean, in a different world could I data request. have emailed some of those questions to Mr. Lutz, possibly. If I had been hit by a bus, would Mr. Luebbert or somebody else know where to look to find those answers, no. So I did them as a data request. So to the extent that Evergy did respond to some of those data requests with useful information, that information exchange did occur. To be blunt, that was very limited

that they provided, you know, kind of full answers to data requests or even, you know, hey, we can't give you exactly what we asked, here's this other thing.

And then there was a settlement conference in this case I think about two weeks ago. All I can say is it was not productive. That's within confidentiality afforded the settlement. Does that answer your question?

- Q. Yes, that's helpful. On the stand yesterday when I asked about communication from Mr. Lutz, he did say that things could have gone differently -- he could have done things differently to try to, you know, get Staff information -- alternative options if you will or different information. Do you think that there's anything that Staff could have done differently to get this information as well?
- A. There's always things we could have done differently, but frankly given the commitment that Evergy made and the way it was worded, I think it was reasonable for Staff to assume that if, you know -- We have lots of stipulations open at any given point in time and utilities tend not to be very receptive to us saying hey, just checking in, where are you on that thing that your deliverable is in six months.

So you know, that's where it's kind of a judgment call if that's seen as nit-picking a utility or

being proactive. Again, the way that the discussion
ended, I don't know what we could have done differently
prior to the filing date. Now, since the filing date, I
don't know, maybe we should have done meetings, maybe we
should have done conferences. Certainly what was done
was not productive.

- Q. Thank you. I also asked Mr. Lutz yesterday about, you know, the ultimate goal of having this data and, you know, what he believes Staff's ultimate goal was of having this data. And I noticed in his testimony, and we've talked about it some at length since then, but I just want to take the opportunity to ask you anyway. You know, if you were given all of this data, what do you think the ultimate goal would be and, you know, even on what timeline?
- A. Sure. Do you want me to go distribution data versus usage data, I hope, because I don't really want to do it otherwise?
 - O. That's fine.

2.2

- A. On the distribution data, the ultimate goal is making sure that rates that are being charged are not -- let me get the magic words here.
- JUDGE HATCHER: Ms. Lange, could you use the microphone. Thank you.
- THE WITNESS: Yes. The ultimate goal is that

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

we can recommend to the Commission what you need to put into an order to provide rates that are not unjust, unreasonable, unjustly discriminatory or unduly preferential or in any wise in violation of any provision of law. That's our obligation.

And so Evergy's rate schedules, as is not uncommon, includes provisions to treat customers differently based on the voltage at which they're served and the overall size of the customer. Rather unusually Evergy's also includes provisions to treat customers differently based on their end use. Those end use rates have been of concern for decades now. So to eliminate those end use rates, or at least to make sure that they're cost reflective, this is where the two kind of cross over, we do need the hourly data by rate schedule as it relates to those end use relates or as it relates to any hourly variation in end use rates. So that's the first part of making sure that our rate structures are reasonable and whether, you know, would that mean changing them. It could, but frankly we need them for what is there now.

Now, as is relates only to billing determinants, weather normalization, fuel and production modeling, all of those things, Evergy's rates are different today than they were -- Evergy's rate structure

1 | is different today than it was a year ago.

Again, I'm not going to tell the Commission you got it wrong. I might want to but I'm not going to. But at the end of the day, we've got the rate structure at Evergy that we've got. And I don't know how we weather normalize. Luckily, I'm not the witness that has to do that, but somebody on Staff has to. Starting that process sooner rather than later for learning how we do that, learning, you know, kind of how to test it,

Missouri has been a national leader in weather normalization. I think it was discussed yesterday about Mr. Proctor more or less developing the technique. I'll give a plug to Shawn Lange who presented at national conferences on weather normalization, weather responsiveness, weather normals.

It's not just that we have to be a leader. We have to deal with what we've got and what we've got are rates that charge customers differently based on the time when they use data. We have to start looking at that information for studying weather responses and for developing NSI, class level peaks and weather normalized billing determinants and revenues.

- 23 BY COMMISSIONER HAHN:
 - Q. Understood. It seems like -- Thank you. It seems like that could be debated about, you know,

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

January 31, 2024

- starting to weather normalize, using time of use rates, and we still have to figure out how to do that. And knowing there's a case coming up, and whatever data is going to take time to compile, potentially if you have to build systems, years, so how do you reconcile the request here knowing there's a case and knowing that you likely might not have this data?
- Yeah, that's going to be a big problem in the rate case, and I don't know what Staff is going to do in the rate case. And we're not going to have a full year of the data, you know. Looking at case timelines, Evergy is not going to have all residential customers on any time-based schedule until the end of the January billing So that data is not going to exist until month for 2024. tomorrow I quess at the earliest. So even if we got that this rate case, we're going to have to do something This isn't necessarily how do we fix the 2024 different. Evergy West rate case. It's whatever mess we're in in the 2024 Evergy rate case, how do we make sure that we're not in that same mess in a 2025 rate case or a 2026 rate How do we start making it better and how do we not make it worse.
- Q. It seems like going forward this is going to have to be something that you're in constant communication with the Company to try to obtain data on

an iterative process.

2 A. I disagree.

2.2

Q. Okay. So moving forward, you think that if we compel data one time, then you don't need it moving -- you don't need it more than one time moving forward?

A. Here's where I can't follow what the Company's actual position is. Okay. So with regard to customer and usage data, Evergy will file their direct case based on a test year. Okay. That's 12 months of data. Evergy has typically used data about six months -- ending about six months prior to their direct filing. What Staff does with I believe every other electric utility is Staff says, and I'm going to do my best here and I apologize to Ms. Cox if I got this terminology wrong because it's slightly different for weather response than it is for a billing.

Staff will say okay, give us a more recent 12-month period of class load data, the hourly data, and in this case it would be the rate schedule data, not the class load, so that we can study the response to weather during that time. And now here's where it's likely I'm going to butcher the detail and I apologize if I make this more confusing than it needs to be.

For billing data, we don't do a new update period but we update the test year through the end of

Staff's update period. With Evergy, that period tends to be a month and a half to two months more stale than what any other utility can provide. So we need a better update period hourly load data from Evergy. What I'm trying to say is it appears from Ms. Dragoo's surrebuttal testimony that Evergy might be saying well, we can do this once per rate case at a cost of 40 grand. If that's the answer, if I were the Commission, I wouldn't be satisfied with that answer.

If I were the Commission, I would say what does a reasonable utility have to do to produce reasonable customer and usage information for use in its rate cases. And I think that that's where if this is a one-time cost or if this is they need \$120,000 for every rate case to provide this data, that's deeply concerning about what decisions they're making about how to incorporate this process. Does that answer?

Q. I think I interpreted her testimony differently in the fact that, a combination of her and Mr. Lutz's testimony differently than that. I interpreted it as we prepare for rate cases ahead so we have adequate staff to do those things and we bill the systems one time to know how to automate this in the future and then we prepare with our staff to make sure that it can be a little bit more automated in the future. My interpretation again

Page 355

was that it's, you know, that cost one time and then, you know, continuing cost based upon like maintenance, but not the same startup basically every time.

- A. I hope your interpretation is the right facts. I don't know. I hope what you're saying is accurate and if so, that's great.
- Q. I'm going to change my line of questioning briefly. Office of Public Counsel yesterday testified that they would recommend instead of perhaps these requests to do two things, a distribution study and a continuing property record audit. Have any other utilities been ordered to do those either independently or at the same time recently?
- A. Yes. I think Ameren, and I'll defer to the wording in the order, but in the Ameren 2022-0037 case, their most recent rate case, Staff raised concerns with Ameren's continuing property record, and I'll defer to the literal wording in the order but my recollection of what the Commission ordered is this is a problem, talk to Staff about how to make it better at least going forward.
- Q. Do you have any recollection of the cost of those items to perform those?
 - A. I don't think that has occurred yet.
 - Q. Okay. Hasn't occurred yet. Got it.
 - A. And that as far as the distribution study

2.2

- itself goes, as I said this morning, I did throw that term out in my testimony and I apologize because I think we're in the situation we're in here because wording can mean different things to different people or it can be chosen to be interpreted in various ways. So what a distribution study means to or what we would be able to enforce a distribution study to mean with Evergy is probably not very helpful at this point. We probably need more specific language.
- Q. Understood. Building off of that, if there is a distribution order -- a distribution study ordered and it does, you know, is recommended by cost categories as you had previously mentioned, you had also previously said that doing these two items may not satisfy Staff's data needs. If you did those items with the cost categories, would that satisfy Staff's data needs?
- A. Okay. And I probably screwed this up in how I said this. So me personally am not in a position to recommend that Evergy do an audit of its continuing property record. I don't know if that will be an issue in a future rate case, but that is a different department. That is different witnesses. I have familiarity with it, but I would not be, you know, able to recommend that today and I'm not recommending that today.

2.2

For distribution, you know, what we're calling
generally distribution study, let's say that what that
looks like is give us, you know, at the highest level it
would be something like tell us how many miles operate at
what voltage. So once we have that information, you
know, when we get to a rate case a year from now, there's
going to be different miles operating at that voltage.
In my mind what we would do for the next decade-ish would
be what did your miles change, did your relative costs
hold constant, what are the miles we have to multiply the
new math because you've added customers, you've increased
system size. That would be what I would hope we can get
to through a process to be carried out in this docket.

Q. Thank you. Mr. Clizer earlier spent a significant time walking through Mr. Lutz's BDL-1 and I like Mr. Clizer thought, you know, following the color coding was particularly instructive though I think that after your testimony I've never been more thrown off with what the Commission could or should take away. I think Mr. Clizer is trying to, and I commend him for trying to do this through his questioning, find some middle ground if you will about what might be achievable for the Company, not burdensome, either to the Company or to consumers as far as cost.

Going to BDL-1, what do you think would be your

recommendation after your testimony of what could be reasonably achieved and provided given the Company's response to your request?

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

A. So this probably isn't going to be helpful. I mean, 1, at anything other than a hundred thousand, and I'm picking that as an arbitrary number, I personally would not recommend proceeding in 1 with anything over a cost after \$100,000 and the likely cost would be much lower than that that I personally would recommend proceeding with.

The problem on 2 through 5 is what we were just discussing. It's really unclear what this means for deliverability when. Is it worth pursuing to some level no matter the cost? I think so. Wait. I said that badly. If the cost is in this somewhere between 21,000 and, you know, a hundred thousand-ish range, even if it's not getting us where we need to be to properly do rate cases, yeah, it's probably worth it, but what we really need to be looking at is what do we need to do to be able to do rate cases that we're not dealing with a year's worth of regulatory lag or two years' worth of regulatory lag in the study of customer responsiveness to weather.

Q. That's helpful. Thank you very much. One last question and it has to do with Attachment A. Actually two last questions. Sorry. In the last rate case in

- 1 | your direct testimony in the data retention portions, it
- 2 | basically sets out the data that Evergy will be
- 3 providing. And then in Attachment A it kind of morphed
- 4 | into that one or two pages of, you know, requests turned
- 5 | into 16 pages.
- 6 A. Uh-huh.
- 7 Q. Help me understand that.
- 8 A. Sure. Could I have a copy.
- 9 Q. Oh, sure, Attachment A.
- 10 A. Yeah, I think it's been premarked as 219.
- 11 | Okay. There's -- I could go through these numerically
- 12 | but I think that would not be good.
- 13 Q. Please don't.
- 14 A. Yes. If I don't answer your question, though,
- 15 I'm not trying to avoid it if that's what you were
- 16 | seeking.
- 17 | O. Got it.
- 18 A. So Mr. Lutz's testimony, Evergy's direct filing
- 19 | in this case, did not appear, I'll say it does not
- 20 | clearly state, what Evergy has to do to get information
- 21 and what it will cost. There is nothing in Evergy's
- 22 | direct testimony in this case that wasn't known by
- 23 | everybody in the fall of 2022. So these questions, so
- 24 | for each item in stipulation provision 1, as I described
- 25 | earlier, I had to ask what is this by item. The lump sum

of 110 million is not helpful, you know, can we
prioritize meters, is that something that's high dollars
in terms of plant balances, low dollars in terms of
study. So there are, I think, 10 or 11 questions to each
utility asking that, and it's important to bear in mind
that Evergy West's distribution system is a lot different
than Metro's distribution system in terms especially of
records that are available. I mean, Evergy West has been
through a lot of corporate transactions and Evergy Metro
is a multi-jurisdictional utility. So both of these are
more complex than, you know, some other utilities might
be. So that's a lot of the questions is why, you know,
what is this item by item. Okay. Then the next view was
what is this account by account for each of the 10 to 12
distribution accounts and whether you lump substations
together or not. Again, because you can do it item by
item, you could do it account by account. Either one
would be reasonable. And then to address the lack of
work papers or really any, I mean, the only testimony in
the case that addresses what's it going to cost is BDL-1.
I mean, to me that's shocking.

So then I had to ask, let me find one here to give us an example, oh, so another thing that we went through for each item was you say you can't do it by voltage and by rate code. So then for each item I asked

Page 361

can you do it just by voltage ignoring rate code. For each item I asked can you do it by rate code ignoring voltage.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

So then I asked a series of questions in Evergy, utility name, opinion what data is necessary to identify item, in this case secondary distribution costs by rate code. In Evergy Metro's opinion, what data is necessary to identify the expenses by rate code and an important thing to bear in mind there is a lot of the distribution expenditures that are going out are done at least ostensibly in the name of automation. So if you're adding a lot of plant to reduce expense, that requires a fresh look at how we allocate expense because if you're paying for the avoided expense you shouldn't be paying proportionately for the expense. So that's the bulk of these data requests. And then for each one, okay, what would it cost you to do a sample. If we did something else, what would you do and what would it cost. are the sort of information just that necessarily there's a lot of them because we're covering a lot of ground. Ι actually set up a matrix here's the information I need, again unhelpfully for the court reporter I'm gesturing, here's the information I need, here's the account I need it from and here's the subject matter I need it on. if you have 12 accounts and you need five or six things

- about each account, you get to a lot of data requests in a hurry.
- Q. Thank you for the clarification. When I listened to Ms. Dragoo and read her testimony, it was clearer to me maybe why the estimates were larger because they have to build systems, you know, or build a system to bring this together. And so if we ask them individually, they may not have an estimate.
 - A. May I respond to that?

- Q. Yes, I was going to ask for your response.
- A. Sorry. This is what is -- This is what's so troubling about this case. When I keep saying this isn't what anyone contemplated in the fall of 2022, that is exactly what I mean. We never ever, ever expected Evergy to sit down and redo all of their USOA records. Of course that wasn't on the table. So to come back and say it will cost us a hundred million dollars to redo everything we do, it's a waste of the Commission's time is what it is. No one expected that. No one was asking for that. You know, in stipulations there's always the difficulty of how detailed do you get, how general do you stay.

Clearly the stipulation needed to have been worded different giving Evergy the benefit of the doubt, but that was never what was contemplated is going back

1 and doing whatever it is that Ms. Dragoo implies we 2 wanted them to do because it's not what we wanted. 3 Q. That's helpful. How many -- This is my last question, I think. In total, about how many data 4 5 requests or has Staff asked for of Metro and West in this 6 case? 7 I can give you the numbers. Α. 8 MS. KERR: I believe there's been 213 DRs in 9 the case. 10 THE WITNESS: Some of those were propounded by 11 Evergy to Staff. 12 Right. I just printed off the total MS. KERR: 13 list of DRs. So there's a total of I think somewhere 14 less than 213. 15 THE WITNESS: There were less than 132 unique 16 data requests from Staff to Evergy. 17 Somewhere around 187 somewhere? MS. KERR: 18 THE WITNESS: No. 19 MS. KERR: 200? 20 THE WITNESS: There were less than 132 -- There 21 were at or less than 132 unique data requests where the 2.2 content of the question was different in some respect 23 other than just changing the name of the utility. 24 MS. KERR: Correct.

COMMISSIONER HAHN:

Thank you. I think that's

L	all	my	questions,	${\tt Ms.}$	Lange.	Thank	you.
---	-----	----	------------	-------------	--------	-------	------

2 JUDGE HATCHER: Are there any other

Commissioner questions, and just fair warning to counsel

I will be asking the Commissioners again before we get to
recross and redirect. The Bench has a couple questions.

OUESTIONS

BY JUDGE HATCHER:

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

2.2

23

24

- Q. I'm not sure how to start this first question. It's mainly an observation. But Witness Lange, you and your counsel just came up with a whole bunch of numbers and it took you about 30 seconds, and I recall

 Mr. Fischer asking almost the exact same question, how many data requests were issued. Is that not the same question?
- A. If Mr. Fischer asked that question, that's the numbers that I would have had.
- Q. I'll have to check the record, but I have the distinct impression that you were very confused about an exact number. You identified big as relative and were unable to answer direct questions or give a good estimate about the number of data requests back and forth. Is that a good summation of what happened earlier?
- A. No, frankly. I remember being confused as to when he was saying data requests if he meant the items in the stipulation. Are you referring to when he was

- talking about the excerpt from my testimony? There was a lot of cross-examination. So I want to be sure that I'm recalling correctly. The issue with my testimony is that he was referring to all data requests and that's not what my testimony was referring to. I don't have an exact subset for the count of how many data requests I was referring to in that sentence for my testimony on page 17 or whatever that page number was.
 - Q. And so your answer just a minute ago how many data requests were there, your answer to Commission Hahn, can you restate that?
 - A. There were roughly 132 unique data requests, and it is difficult to answer in that whether you're saying the literal data requests were the only difference was Evergy Metro versus Evergy West.

JUDGE HATCHER: Okay.

CHAIRMAN RUPP: Judge, just to interject. My recollection I do remember the witness answering the question that there was 132 specifically. The counsel is saying there was closer to 200. They went back and forth on whether or not that, but I do remember the witness stating 132.

- JUDGE HATCHER: You're right. Thank you. I appreciate that.
- 25 BY JUDGE HATCHER:

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

- Q. Let's change topics. You had mentioned the 1990 agreement -- 1990s agreement. An agreement is the term that I want to focus on because up until your testimony I was under the impression that there had been a distribution study in the '90s and that was what we were trying to redo after a couple decades. Now I have the impression that there was an agreement between Staff and the Company, possibly other parties; is that correct?
- A. Well, I think the agreement was how to go forward after the study had been done. So it was how to reflect the relationships between cost of service that were identified in the study in customer rate structures and rate designs.
 - Q. So there was though a distribution study done?
- A. That is my understanding. I was in fourth grade when that occurred. But based on the context that's been presented to me by former Staff witnesses and the language in the document itself, I don't think those numbers were made up, you know, and I know that there just was a lot of conversation in the early 2000s about all the work that had been done on distribution at each of the utilities in the early '90s.
- Q. This is a discussion question. I'm looking for your full answer, not a yes or no. Would you discuss -- would you compare what I've heard in testimony that Staff

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

needs, big air quotes needs, this data to perform its function versus Staff could do a better job with more accurate data but not quite hitting that need. I want to hear from you where is that need, what's going to be the shortfall if there is no additional information?

This is always going to be a subjective view of Α. where rates have crossed over to unduly discriminatory. That is the caveat. It's going to come down to what each witness is comfortable with signing their name to when it's time for them to participate in a rate case. time that I wrote the direct testimony, so going back to June of, or before June, whenever the direct testimony was filed in the rate case, whenever this list was drafted, with regard to the customer and usage information it was boy, we really need this. Where we are going to be in an Evergy rate case that occurs a year from today, recognizing we cannot incorporate this reasonably into one that's getting filed a couple weeks from now, we need it.

We need the customer and usage data. For the distribution data, there's always something we can do to make an imputation or to come up with a here's the best we can do in the absence of information. Frankly, we did that in Ameren and the Commission said no, it's not good enough. That's up to the Commission if we need better

data to perform a CCOS. But at end of the day I guess to hit this as smack dab on the head as I can, you can always do equal percentage or some other implementation of rate increase to sidestep CCOS and rate design even if it's a really bad idea. You can't not calculate revenues and billing determinants. You can't.

So an option would be a negative, you know, Evergy can't provide the information, let's give them an adverse evidentiary result of that. Let's say okay, we're going to impute revenues because we're not sure what the right revenues are.

I don't like that solution. Can we say Evergy can't provide what a reasonable utility with this rate structure would provide to calculate revenues and billing determinants and NSI and responses to weather and MEIAA throughput disincentives and all the other things that rely on that information. I guess we can. It will depend on how much information and how much time we have as to whether the Commission is going to be able to find that to be a just and reasonable result that is not unlawful in some other manner and frankly that complies with PURPA.

Q. Okay. Switching topics again. Back to Mr. Lutz's direct Schedule BDL-1 and I'm looking at 8b. We're talking about coincidence peak determinants. My

Page 369

understanding is Staff is asking for 15-minute increments versus hourly; is that correct?

- A. That is what we asked for. If Evergy's problem is that they just can't do 15, they need to do 30 instead or failing that they need to do hourly instead, I asked a data request to Mr. Lutz saying can you give me a couple, I say a couple because in regulatory terms it's a couple, I probably asked for a hundred, can you give me customer sample data so that I could look and see if that 15-minute relationship to peak is consistent with their hourly relationship to peak, what sorts of customer impacts are we going to have and is this giving us the information we need, and I believe his response to that data request was only if the Commission orders us to give it to you.
- Q. My question is, can you explain the significance between a 15-minute interval and the hour?
 - A. Sure. Can I use you as a residential example?
- 19 Q. Sure.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

- 20 A. Do you have an air fryer?
- 21 Q. No.
- 22 A. Can you pretend you have an air fryer?
- 23 Q. I do.
- A. If you run your air fryer, let's say that it is going to draw 5 kW. Okay. If you have that air fryer on

tell us the hourly peaks because we can find that

ourselves.

- Q. Okay. Let's switch again. I want to talk about five years versus ten years on the plant data needed. Why isn't five years sufficient?
- A. So this -- Let me just preface by saying it's really unfortunate that this wasn't a conversation instead of a war of motions. Five years isn't a great idea right now because of when those five years fall because those five years don't get us back to prior to Evergy beginning to spend millions and I think maybe even billions of dollars on distribution. So part of why I wanted five years is to see what accounts are really changing as a result of the PISA process and what accounts are fairly stable for prioritization.

Another issue that's very closely related to that is what is the effect of automation, are we seeing expense levels dropping in let's say overhead conductors and devices, if we are increasing plant levels in overhead conductors and devices. Probably that was a bad example. Poles is probably the best example. In theory, if we're putting up a bunch of new poles, we're probably replacing fewer poles due to weather or other items that could cause pole expense to be incurred. So those are relationships that are studied over the decades, not over, you know, a year or two. Now, that said, this is

information that they have to keep on their books every year. This is information they have to compile to file their FERC Form 1 and to file their Missouri Annual Report.

This is as basic of a request as you can ask a utility as I can imagine. This isn't a go find archives and pull up data that you don't use every day. This is a hey, what did you file with FERC. In fairness, it is at a one up level of detail from what they file at FERC. What they file at FERC is total distribution expense but that's summed from their actual accounts and total distribution investment summed from their actual accounts. So does that answer your question?

- Q. Yes. On the meetings, there's been a lot of talk about meetings between Evergy and Staff. I just want to confirm I've heard the number four. There's been four meetings since the filing of this case or perhaps since the stipulation in September 2023, but I have four in my notes. Can you confirm that?
- A. The meetings I'm aware of, there was -- I did look it up over lunch. So on August 9, Evergy conducted what they termed a rate modernization workshop. It was not directly -- August 9 of 2023, that, one, was not directly related to this docket. Two, included very little, if any, information about anything other than

Page 373

- Evergy's desires to do buffet-style rate pricing and prepay. And three, I have to go only on what is in the presentation for that because as I confirmed over lunch that Evergy scheduled that when I had indicated I was unavailable and I was taking my at the time foster son to a vacation. So that was one meeting.
 - Staff -- So the last slide of that August 9
 presentation had I think the question, you know,
 stakeholder feedback? Residential rates? C&I rates? In
 response to that, I prepared or I should say I converted
 to presentation form what's been --
 - Q. Ms. Lange, can you confirm the number of meetings, please, just the number.
 - A. I'm sorry. Two at best, realistically zero excluding settlement conference.
 - Q. Thank you. I believe this is really close to the end. I want to talk about a fuel adjustment clause.
 - A. Sure.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- Q. The fuel adjustment rate is multiplied by a voltage adjustment factor which equals the rate charged to customers through the FAC; is that correct?
 - A. I believe so.
- Q. Would you define what is a voltage adjustment factor and how does it relate to the information in this case?

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- If I can refer you back to Staff's Α. Sure. cross-examination of Mr. Lutz yesterday, regarding what we termed line losses, okay, so the voltage adjustment factor is a reduction of a value for line losses to say that if you are a customer, if you and I are both Evergy customers, you were served at primary, I am served at secondary. Evergy has to put about 2 percent more energy on the system for every 100 kWh that I use versus every 100 kWh that you use. The line loss factor is the adjustment that is applied to account for that I'm sorry. The voltage adjustment factor is difference. that factor as applied to account for that difference.
- Q. And would you tie in information that you're asking for in this case to how you're going to calculate that FAC?
- A. Oh, okay. I mean no disrespect. Those are two completely different issues. So the voltage adjustment factor is what gets applied within the FAC to account for line losses. The issue where I said in my testimony we need this for calculating the base factor of the FAC is because Staff does what's called a fuel and production model and the Company does what's called a fuel and production model to come up with the net base energy cost which is the cost of putting fuel into a power plant net of the revenues received for burning that fuel through

its participation and integrated markets and a couple
dozen pages of tariffs that caveat around that that Ms.
Mantle is going to know probably staring at the back of
my head in anger at how I'm simplifying that.

So that shape that Staff puts into its fuel and production cost modeling is derived from the sum of hourly system loads. Depending on the utility and depending on the timing and all sorts of other factors, that shape if you will of the relationship between the energy consumed in each of those 8,760 hours is adjusted by the response of customers to weather. So when we weather normalize, the customer and usage data that will in theory flow through how we model the utility's requirement of energy during the study period that eventually becomes a very significant input into the FAC base factor.

JUDGE HATCHER: Thank you. As promised, I'm going to ask the Commissioners one more time because this has been really the point of a lot of this discussion.

Are there any Commissioner questions for Ms. Lange?

Excellent. We'll go back to recross and redirect. Find my cheat sheet. And we will go to Mr. Clizer.

MR. CLIZER: Thank you. I'm going to endeavor to make this relatively quick.

RECROSS-EXAMINATION

2.2

BY MR. CLIZER:

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

- Q. Just first for the sake of the record, you used the term FERC, which I believe is F-E-R-C for Federal Energy Regulatory Commission; is that correct?
 - A. It is.
- Q. You also used the term NSI. That would be net system inputs; is that correct?
- A. Yes. I think in some utilities it's called net system interchange or variations on that, but it's effectively the amount of power that a utility requires to serve either its retail load, its retail load with wholesale load, depends on the utility. Frankly I don't recall for Evergy which it is.
- Q. You were asked a question by Commissioner Hahn regarding the data, whether or not the data is needed to support Staff's case. In answering that question, you sort of broke it down into three buckets. I don't know if you recall that conversation.
 - A. I do.
- Q. This was before lunch. I think you broke it down into the distribution, I have customer usage information and sample data. Does that roughly coalign with the three buckets you talked about?
- A. It does. That discussion didn't get to all of the items on the list but most of them.

Q. Well, actually that was going to be my thing.
For the sake of the record, if you could look at BDL-1
and help me figure out which items are in which buckets.
I believe the distribution information is item 1 and 8c1
which references back to it?
A. Yes.

- Q. Okay. Then I actually don't know for certain, so I'm just going to ask, what would be the customer and usage information, which item numbers would that be?
- A. That would generally be, and this is in my testimony, that would be 2 and 2a, 3 and 3a, 4 and 4a, and then that apparently subsumes 5.
- Q. And the sample data information, which one would those encompass?
- A. So depending on if you're looking at it as sample data for Staff to do analysis with or sample data for customers to see their own bill impact, that would be 7, 8a, 8c3, 8c4 and then a subset of 8d.
- Q. Thank you. You had a conversation with Chairman Rupp at the very beginning. One of that conversation involved whether or not the data being requested would result in a time savings for the Staff. Do you recall that?
- 24 A. I do.

Q. And you had basically said this would bring us

- back to the status quo. I think I'm paraphrasing your answer relatively correctly?
 - A. Yes.

2

3

4

5

6

7

8

9

10

11

13

14

15

16

17

18

19

20

21

22

23

24

- Q. There was another further conversation with the Bench regarding the need for the data. I assume you recall that, that was one reason?
 - A. Yes.
- Q. I want to drill down on that for just a tiny moment. In the last rate case, last Evergy rate case, you were responsible for developing rate design class cost of service, correct?
- 12 A. I was.
 - Q. It's my understanding that effectively Staff determined that it could not perform a class cost of service in the last Evergy rate case based on the information available; is that accurate?
 - A. I believe the way I phrased it, and I would defer to as it is worded in that docket, that I think I said something along the lines if you can use it as a reasonable check but don't rely on it the way you typically would. Again, I defer to the testimony. I don't recall the exact language, but that's conceptually.
 - Q. So when you say bring it back to the status quo, you are effectively meaning bring it back to the point where we can rely on Staff's class cost of service

Page 379 1 for what it purports to be? 2 Α. Yes. 3 Q. And then one last thing really quick. 4 has been discussion regarding the continuing property 5 record audit as an option whether or not that's important 6 here or elsewhere. You would agree with me that a 7 continuing property record audit would have other 8 benefits beyond just the class cost of service design, 9 for example, determining whether or not there was plant 10 that needed to be removed from a company's books or 11 checking depreciation rates? 12 Well, those two things in my mind would be what Α. 13 a continuing property record audit is. The latent 14 benefit of that is that we could use it better for class 15 cost of service. 16 MR. CLIZER: I have no further questions. 17 Thank you. 18 JUDGE HATCHER: And the Company. 19 MR. FISCHER: Thank you, Judge. I had a couple 20 clarifying questions for you. 21 RECROSS-EXAMINATION 22 BY MR. FISCHER: 23 Judge Hatcher asked you about the 1990, whether Ο. 24 it was an agreement. Do you recall that conversation?

I do recall that conversation.

25

Α.

- Q. Have you ever seen a distribution study that was dated 1994 that we could go look at to see what it was?
- A. Again, this is the ambiguity around the word study. So you could define a study as the relationship of the rates that were attached to that agreement.

 That's frankly why I would just defer to what the agreement says and use it as an exhibit.
- Q. That's what I'm trying to clarify. There's not a document like you would say a depreciation study, right; it's a review that Staff did or the utilities did back in the '90s of their distribution plant. Is that what we're talking about?
- A. If you're referring to the document that you objected to Staff offering into evidence, I mean, is that the document you're referring to? It speaks for itself as to what its contents are.
- Q. That was a Stipulation and Agreement that I signed 27 years ago that didn't have a study in it. It just had some agreements on how to proceed forward, right?
 - A. I disagree.

Q. Do you? Okay. Is there a document that I can look at that says distribution study for Kansas City

Power and Light Company dated whatever date it would be?

Τ	A. I don't know the literal title of documents
2	that I don't have in front of me, no.
3	Q. Can you tell me have you ever seen something
4	that you would declare to be a distribution study?
5	A. I would consider that document that's setting
6	out the relative prices for rate elements and the
7	contents of rate elements, that to me falls under the
8	umbrella of distribution study. As I said, maybe
9	distribution study isn't the most helpful term.
10	Q. Aren't we really talking about your desire to
11	have Staff do a deep dive into distribution system
12	analysis?
13	MS. KERR: I'm going to object to this line of
14	questioning. We're talking about a study that hasn't
15	been entered into evidence.
16	MR. FISCHER: Judge, I'm trying to understand.
17	She says we need this data to do a distribution study.
18	What does that mean? Does that mean like a depreciation
19	study that's required to be done or is it just a desire
20	to look more into this particular topic?
21	JUDGE HATCHER: Ms. Kerr, I did not hear what
22	your objection was.
23	MS. KERR: I'll withdraw it. Never mind.
24	JUDGE HATCHER: Go ahead.

THE WITNESS:

I think his second question was

- Page 382 1 clearer and I can answer it, I think. My need as a 2 member of Staff to provide a recommendation to the 3 Commission concerning the justness and reasonableness of 4 rates is information to support rate elements that cause 5 price discrimination, and I don't mean that in a 6 pejorative way, it's just what you call it, among 7 otherwise similarly situated customers. You can get 8 there a lot of ways. 9 BY MR. FISCHER: 10 Ο. I quess like the Commission rules say you need 11 to do a depreciation study every three years or five 12 years and you're required to do that. There's not 13 anything like that, is there, that's comparable on a 14 distribution system study? 15 Α. There's a statutory requirement of setting just 16 and reasonable rates that are not unduly discriminatory. 17 That's really an ultimate decision that these Ο. five Commissioners have to make in each case; is that 18 19 correct? 20 Absolutely. Α. 21 MS. KERR: Object. 22 MR. FISCHER: Legal conclusion? 23 MS. KERR: Never mind.
- 24 BY MR. FISCHER:
- Q. So that the Staff recommends what we should do

Page 383

in a rate case. Ultimately the Commission decides what are just and reasonable rates. You decide if you think there maybe is differences between costs that maybe ought to be reconciled. Maybe the residential rates are not earning the same rate of return as the industrial rates. You point all that out in a cost of service study. Ultimately you give it to the Commission to decide what are just and reasonable rates. If I understand your testimony, you would like to be able to do a deeper dive into what distribution relationships are out there, right?

- A. What is throwing me in the question you're asking is that you're not putting bounds on it. There are lots of things about the distribution study that aren't relevant that I have no interest to waste the state's time in looking at. I specifically need to look at those characteristics that are reflected in Evergy's existing rate design and rate structure. That's all I'll look at.
- Q. Okay. If the Commission would say out of this docket Evergy or Staff, go do a distribution study, what would you do?
- A. Again, the theory I have or the best idea I have right now would be to say to use the numbers I've been using all morning, what can you look at for line

1	transformers for ten grand or less, what can you look at
2	for meters for ten grand or less, can you get us better
3	information than we have today about the costs of running
4	a mile of overhead conductor and poles that operate at
5	345 KV. Those are the literal questions that I would
6	ask.
7	Q. Those are the literal questions with a lot of
8	subparts that you asked in this docket already; is that
9	right?
10	MS. KERR: Objection. Is that a question?
11	MR. FISCHER: Is that right?
12	JUDGE HATCHER: There's an objection.
13	Mr. Fischer, do you have a response? First of all, Ms.
14	Kerr, what's your objection?
15	MS. KERR: I was waiting for a question there.
16	He added a question mark, so never mind.
17	JUDGE HATCHER: Okay. Go ahead.
18	THE WITNESS: There are data requests
19	addressing some but not all of those items. There
20	definitely are not data requests that have been
21	propounded that address what can you do on each of these
22	topics for ten grand, and I don't believe as it regards
23	those questions that I just described the Company has
24	provided answers to those data requests that involve a

quantification or anything other than a statement that it

- **Evidentiary Hearing** January 31, 2024 Page 385 1 isn't how they currently keep records and they can't 2 provide it and they can't be compelled to provide it. 3 BY MR. FISCHER: 4 Let's change topics a little bit. There was a 0. 5 question from I think Commissioner Hahn about what we 6 could have done looking back, how communications could 7 have been better, that conversation. Do you recall that? 8 Α. I do. 9 Would it surprise you to know that the Company Ο. 10 did not realize until your position statement was filed 11 that it was your position that it would be imprudent for 12 Evergy to expend the lump sum estimate provided in 13 Attachment BL1-1? 14 You're asking me to speculate on how the Α. 15 Company read my testimony? 16 I'm asking you if you'd be surprised about Q. 17 that? 18 I would, yes. Α. 19 Okay. Would it be surprising to you too that Ο. 20 there was nothing that we understood from your testimony 21 that you were abandoning your request for set of data No.
- 23 MS. KERR: Objection, speculation. 24 JUDGE HATCHER: Can you restate the question?
- 25 MR. FISCHER: Sure.

1 in this case?

BY MR. FISCHER:

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

- Q. I was asking whether I guess it would surprise her that there was nothing that we could perceive from your rebuttal testimony that you had abandoned your position you didn't want the set of data No. 1?
- A. To be very clear, Staff has not abandoned pursuit of the information in data 1.
 - O. Okay. So --
- A. Mr. Lutz offered alternative data. He declined in either his testimony or in response to Staff DRs to indicate in any manner what that alternative data may be, and I specifically recommended keeping this docket open to pursue alternative data.
- Q. But the alternative data would be different than what you've asked for in Data Request No. 1?
- A. I disagree. I think the Company used a very unusual interpretation to give them the benefit of the doubt as to what Staff requested in what it committed to provide for item number 1.
- 20 MR. FISCHER: I think that's all I have. Thank
 21 you.
- JUDGE HATCHER: Thank you, Mr. Fischer. That
 will take us back to redirect.
- MS. KERR: Thank you. Get my questions together.

REDIRECT EXAMINATION

2 BY MS. KERR:

1

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- Q. Yesterday Mr. Lutz had testified that perhaps
 Staff is asking for this information for its own
 ratemaking purposes. Is that an accurate presumption for
 Mr. Lutz to make?
- Evergy's existing rate schedules treat Α. customers differently based on the voltage at which they receive service and the end use at which they receive Staff is aware that Evergy does not have that information by rate schedule. So to the extent that Staff is pursuing what I'll refer to as continuous rate design, I guess that's its own purpose and that it's not part of the existing rates, but the purpose of doing that is to minimize the amount of assumptions and other quesses we have to make about how customers with the same equipment and the same size use energy on different rate schedules and just look to how maybe it would make sense to align those cost elements across rate schedules or across classes to avoid the need to get as detailed in the data.
 - Q. But you're not doing it for your own ratemaking purposes as he has testified? I mean --
- A. Making things simpler and easier, I guess that's my purpose. I'm not trying to, yeah, that's all I

can say.

- Q. Okay. Now, Mr. Fischer asked about rate codes, voltage levels. Why would Staff ask for this?
- A. Those are existing discriminatory pricing features in Evergy's existing rate schedules and Staff from time to time asks to review the reasonableness to ensure that they're not unjustly or unduly discriminatory.
- Q. And Mr. Fischer asked about Staff's request for line and transformer costs by rate code. Why would Staff make that request?
- A. So line and transformer requests by rate code is potentially one of those items that we could move away from to the extent that we price that by voltage and customer size rather than by rate code. That said, existing facilities charges at Evergy are designed to assume that customers served at primary do not cause line and transformer expense despite Mr. Lutz's response to a DR in this case that some line transformers are used by some primary customers.

I'm looking at Mr. Lutz to make sure that I didn't misremember that data request. There has been some productive discovery in this case. That is an element that was good to know. We frankly hadn't thought to ask that question before.

Q.	Mr. Fischer also asked about changing Ever	gy's
computer	system. Did Staff believe Evergy had access	s to
the data	that Staff requested in the last rate case v	when
it asked	for this information?	

- A. We understood when we entered the Stipulation and Agreement that Evergy couldn't pull the answers to those questions off the shelf. What we understood the Stipulation and Agreement was going to get us for lack of a better word was progress on what I'll call the low hanging fruit of that information and cost estimates and process plans on everything else.
- Q. So now Evergy signed the stipulation voluntarily, right, as far as you know? I mean, they weren't forced to sign the Stipulation and Agreement, the August '22 Stipulation and Agreement?
- A. Staff and Evergy and I believe maybe MECG and maybe OPC, I'll defer to the agreement itself, entered into the stipulation.
- Q. And Evergy committed to provide the data that's listed in I believe it's kind of outlined in Staff's Exhibit 204 and BDL-1?
- A. Well, they committed to provide what they could.
- Q. Right.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

A. At I guess what I'll call a de minimis cost or

- to provide what they would have to do to provide what they didn't provide and what they thought it would cost to provide what they didn't provide.
- Q. If they couldn't provide it, then they'd give us a cost estimate as to what it would take to get that information basically?
 - A. Let me look at the language here.
- Q. Language of the stipulation is if the requested data is not available, identify and provide the data. If the requested data is not available, cost prohibitive, they'll open this EO docket and provide a reason why it can't basically?
- A. Yeah, that is the language something like explain why they couldn't provide it.
 - Q. Right.

A. And that's a critical part that is not in the direct testimony that doesn't move us past where Lutz was in his rebuttal testimony in the rate case. And I apologize for Mr. Lutz, you know. In Mr. Lutz's rebuttal, he said we don't have it that way. So to me what was going to be a really valuable output of this case for the things where the production costs weren't de minimis would be here's what we would need to do to get where the utility thinks would be the reasonable way of providing that data.

- Q. So Evergy agreed that it would provide individual costs of providing that data if they didn't have it? That's the language in the stipulation?
- A. And explain what they would need to do to do it, yes.
- Q. So it would be fair to say that Staff expected Evergy to either already have the data or have a plan to determine how much it would cost to obtain that data?
 - A. Yes.

- Q. So you wouldn't expect -- okay. One of the questions that came up was a number of data requests, just DRs, discovery data requests I'm talking about.

 Now, you sent DRs to Evergy directed at Evergy Metro and Evergy West?
 - A. In some instances. In some instances, the data requests where it wasn't really pertinent to what their literal books and records would be where I would know there would be different answers or to what processes would need to be undertaken where I would strongly suspect there could be different answers. I think I tried to write the data requests to include a sentence that said we're directing this to Evergy Metro but if West's answer is different please explain.
 - Q. Okay. But a lot -- So a lot of the DRs that you sent, that would account for the duplicate so to

- speak DRs that the same, basically the same DR went to Evergy West that went to Evergy Metro?
- A. Yes. Where it would relate to things like their books and records that we know are going to have different answers if they had answered them.
- Q. Okay. So that would account for say there was over 200, say if there were 200 DRs, maybe half of them would have been to Evergy West, half to Evergy Metro and that may have been where the confusion came in as to the number of DRs you were talking about?
- A. I think there were approximately 132 unique DRs recognizing I may have made a mistake in counting Excel rows, but I think it's about 132 unique data requests.
- Q. So this 132, one might have been Evergy Metro, one was Evergy West, but it was the same question to both?
- A. No. So the 132 is accounting for where I know I asked the same question to both.
 - Q. Okay. Right.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- A. There may have been another one or two where it was duplicative and I didn't catch it.
- Q. Now, the stipulation include asking for -- I guess you've already -- the stipulation you've said included asking for individual estimates for the different types of items for the different items of data,

right?

- A. Yes.
- Q. And so would asking for individual estimates allow the Commission Staff and the Company to prioritize studies and prioritize what kind of information that's more important?
 - A. That was the intention, yes.
- Q. In item, data item 8, 8b and 9, you talk about NCP demand charges. Can you explain the difference between NCP and CP, that's noncoincident peak, and coincident peak and why that difference is important?
- A. Yeah. So a noncoincident peak running through the example with the Judge earlier would be regardless of the time of day that he turned on his air fryer and whether we're looking at 15-minute or 30-minute or hour or five minute, whatever time during the course of the dates and typically in the billing context like we're talking about here we're saying within a month, and that would be a billing month which is not necessarily a calendar month, the NCP is the time or the amount of energy used in the interval which was the relevant interval in which the highest amount of energy was used.

Now, we are calling the alternative to that in the ratemaking sense the coincident peak. In reality, we don't know the coincident peak until after it has

occurred. So in ratemaking in general when we refer to a
coincident peak, we're saying we're looking at a total
amount of energy used in a month or a year or whatever it
is, this was the interval in which the system used the
most energy and we know in that interval who used what
because it's already passed. We can't do that for
billing purposes. So for billing purposes, and this is
again it's not really spelled out because this is a
common feature among co-ops, munis and Evergy and other
jurisdictions, what we're saying is we're going to define
a time period that is presumptively coincident. So it
would be usage during that time period that meets those
criteria. So for example, if we said what we're looking
at for coincident peak is four o'clock to 7:59, then it
would be the 15 minutes or the hour or whatever between
four o'clock and 7:59 for the month in which you used the
most energy.

- Q. Now, when you're talking about information that's been provided or can be provided, you mentioned an agreement with Evergy and Ameren. Did you mean Liberty?
- A. Yes, it was brought to my attention during lunch that I apparently misspoke and said that we had an agreement with Evergy about providing the information discussed with Evergy and that should have been Liberty or Empire or Algonquin or whatever name we're going with

1 today.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

2.2

23

24

- Q. Thank you. And then you also mentioned NSI in response to Commissioner Hahn's questions. What is NSI?
- A. I tried to address this with Mr. Clizer. I'm not confident if for Evergy it is net system interchange or net system input, but it's one of those things.
- Q. Sorry. And the Judge asked about FAC voltage adjustment factors. Do those factors differ from the voltage adjustments included in non FAC rate differentials?
- A. At a given point in time, yes. At another given point in time, no. Ideally we align those from rate case to rate case. Again, I look back to Mr. Lutz. I think we've missed that in a couple now, haven't we. They're not off by a lot. They're pretty close. But yeah, we probably do need to tune those up for Evergy.
- Q. We had a discussion about that Staff was working with some other companies and that there was a couple workshops that you had with Ameren on the similar issues. What kind of information or what are you asking for from some of the other -- from Ameren? What are you getting from them?
- A. It is a workshop and I expect their presentation from a most recent workshop will be available to the Commission any day now. They said

they're going to file the presentation. A couple of
obvious examples that come to mind is conversation Tom
Hickman presented where he stated, you know, that Ameren,
you know, isn't necessarily on board with charging the
same metering charge for customers in all rate classes
that have those meters but they were looking at, you
know, the appropriate number of bins in which to look at
meter costs. And so when I say "bins," you know, there
might be at a given utility 200 or more different literal
meters. You get a new serial number from your vendor,
you probably have a new retirement unit, different things
like that, but that there's some fairly obvious groupings
of, you know, these are the sorts of things that, you
know, this kind of meter would be what would typically be
installed for, you know, a detached residential customer
or a small business versus this is the kind of meter that
you would have for a smelter and a lot of things in
between. So where that discussion is now with Ameren is
looking at I think we talked about six bins was his guess
at that time of what might be reasonable but he was going
to dig into it further. So that's an example of where we
are on the meter costs.

On the equivalent of the customer and usage information, it's my understanding that Nicholas Bowden, Dr. Bowden perhaps, I don't recall for sure, it's my

1	recollection that he stated that what DR or what the
2	stipulation provisions 2 through 5 do he did have to buy
3	a new laptop but he's running that on his laptop to
4	provide hourly summations by rate code and to look at the
5	sort of coincident peak information and that sort of
6	thing.
7	Ameren is doing in house. I would assume that
8	it's not a, you know, thousand dollar Staples laptop, but
9	Ameren is at this point I understand able to do a lot of
10	the customer and usage information in house.
11	JUDGE HATCHER: Ms. Kerr, we do have three more
12	witnesses and only about two and a half hours left, if my
13	math is correct.
14	MS. KERR: I don't have any other questions.
15	Thank you.
16	MR. CLIZER: Your Honor, I'm sorry. One really
17	quick bit of business if I may. Yesterday there was a
18	movement yesterday Staff moved to admit onto the record
19	an Exhibit 213.
20	JUDGE HATCHER: Thank you. I'll get that too
21	at the end. You're talking about the exhibits?
22	MR. CLIZER: No. Yesterday I am, but
23	yesterday Staff moved to enter an exhibit which I believe

and the objection was sustained on the grounds of

was 213 which was the 1996 agreement that was objected to

24

- relevance which made sense at the time. However, given
 the testimony today, I would argue that the relevance for
 that document has been established and therefore I would
 make the unorthodox move to ask that Staff's exhibit be
 admitted. Again, I believe it was 213, subject to check.
 - JUDGE HATCHER: It was. Mr. Fischer, do you care to make any response?
- MR. FISCHER: Well, I did ask some questions

 about it. I have to admit that. I still think it's not

 relevant to what we've been talking about. It's

 apparently not a distribution study. It's an agreement

 that was identified back in the '90s and that's all it

 was.
- 14 JUDGE HATCHER: Mr. Clizer.

- MR. CLIZER: Very briefly. All I'm going to
 say is we've been talking about it now for quite a bit of
 time. It seems silly to have a document discussed that's
 not in the record. For the completeness of the record is
 all I am asking.
- JUDGE HATCHER: It could have been filed with the testimony. Ms. Kerr.
- MS. KERR: I'd have to agree.
- JUDGE HATCHER: Excellent. Overruled. Thank you. Ms. Lange, you are excused subject to recall.
- 25 Let's get Mr. Stahlman. Thank you.

Page 399 1 And we have Mr. Stahlman on the stand. Thank 2 you, sir. Do you solemnly swear or affirm that the 3 testimony you provide today will be the truth? 4 THE WITNESS: I do. 5 Thank you. And Staff, your JUDGE HATCHER: 6 witness. 7 Thank you. Good afternoon. MS. KERR: 8 THE WITNESS: Good afternoon. 9 MICHAEL STAHLMAN, 10 having been first duly sworn, was examined and testified 11 as follows: 12 DIRECT EXAMINATION 13 BY MS. KERR: 14 Could you please state your name for the record 15 and spell your last name, please? 16 Michael L. Stahlman, S-t-a-h-l-m-a-n. Α. 17 And by whom are you employed and what's your Ο. 18 position? 19 Missouri Public Service Commission as an Α. 20 economist. 21 Ο. And have you prepared and filed testimony in 2.2 this proceeding, specifically rebuttal testimony that was 23 filed on December 15, 2023, that's been marked, 24 previously marked 203?

I'm not positive on the actual exhibit number

25

Α.

1 but yes.

- Q. Do you have any changes or corrections to make to any of those documents?
 - A. None that I'm aware of.
- Q. If I were to ask you the same questions in that document today, would your answers be the same or substantially the same?
- 8 A. Yes.
- 9 Q. Are those same answers true and correct to the 10 best of your knowledge and belief?
- 11 A. Yes.
- MS. KERR: I offer Exhibit 203 into evidence and tender the witness for cross-examination.
- JUDGE HATCHER: You've heard the motion. Are there any objections to Exhibit 203? Hearing none. So admitted.
- 17 (STAFF EXHIBIT 203 WAS RECEIVED INTO EVIDENCE 18 AND MADE A PART OF THIS RECORD.)
- 19 JUDGE HATCHER: Witness has been tendered.
- 20 | Mr. Clizer.
- MR. CLIZER: In light of the hour, I will
- 22 | forego subjecting Mr. Stahlman to cross and move right
- 23 | along. No questions. Thank you.
- JUDGE HATCHER: Mr. Fischer, in light of the
- 25 | hour, I'll just ask a few, if that's all right, Mr.

- 1 Stahlman.
- 2 THE WITNESS: Sure.
- 3 CROSS-EXAMINATION
- 4 BY MR. FISCHER:
- Q. I'd like for you to turn to page 3 of your testimony.
- 7 A. Sure.
- Q. And particularly where it starts at line 5 what data does Staff use for weather normalization of load.
- 10 Do you see that?

13

14

15

17

18

19

20

21

22

23

24

- 11 A. I am there.
 - Q. Okay. Then you say as an answer, for the regression analysis portion Staff needs at a minimum the daily energy used by each customer class for a two or three year period from the Company; is that right?
- 16 A. Yes.
 - Q. How does Staff intend to manage this regression analysis for the residential class given the recent migration of customers to do rates?
 - A. That really depends on what data would be available. That is a big question. I'm not sure what data is going to be available from Evergy to handle that migration. It is of great concern. And to some extent, I mean, the question itself is almost like asking what my betting strategy is for a poker hand before the cards are

Page 402

even dealt. I really need to see what is available, what we can easily achieve.

Q. Let's assume the data that's available is similar to data that you've had in the past.

- A. So from the past, I believe Evergy has been able to get me the hourly load by a rate class being, such as residential as opposed to the rate code. And so there might be the ability to look at some changes, but that assumes an awful lot of information. The big issue that we have in the upcoming case is the differential in time of use rates.
- Q. And assuming we had the same kind of data we had in the past, you would be able to do weather normalization; is that right?
- A. I honestly don't know. Because of the changing in the different rate codes, what would be ideal is if I could give Staff Witness Kim Cox like a usage per customer per the time block weather normalization adjustment and just with the difference in the way that the data would be coming with the rate code switching. That's really going to be hard to figure out how that or the Company are going to be a weather normalization.

 Just for clarification, the importance of the weather normalization is to figure out what the revenues are in a rate case. So when the Commission issues an order, it's

Page 403

usually a revenue requirement of an increase of, say, \$50 million.

The question is \$50 million on top of what. So there can be tens of millions of dollars of questioning on what their actual revenue is because of the high differential in these time of use rates.

- Q. Let me ask you this question. On page 3 of your rebuttal, I think starting at line 10, you describe your reliance on daily weather data from the Midwestern Regional Climate Center. Do you see that?
 - A. Yes.

- Q. Is it true that the normal weather obtained from that particular place is an arithmetic mean of temperature over a 30-year time frame?
- A. Not precisely, no. So the information we obtained from the Midwestern Regional Climate Center is the daily high temperatures and the daily low temperatures. There is hourly data available but that record is a little bit more questionable as far as how that has -- if it has all the hours for the full 30 years.
 - Q. Typically it's been a daily?
- A. Yeah, we do get the daily high temperature and low temperature from that center and then that goes -- then we used a ranked method so we are not using an

arithmetic --

1

3

4

5

6

7

8

9

10

11

12

17

18

19

- 2 O. Arithmetic?
 - A. -- precisely for each calendar date.
 - Q. I don't want to go too far in the weeds, but it's really a look at 30 years worth of weather, right, to try to figure out what's normal weather?
 - A. To get to what we have used historically as normal weather, that is 30 years.
 - Q. Okay. On page 7, line 5, you state weather normalization of customer usage on the remaining time-based rate plans will require --
 - A. Can you hold on a second.
- 13 Q. I'm sorry. Sure.
- 14 A. You said --
- 15 Q. On page 7.
- 16 A. Page 7, line 5.
 - Q. Yeah. Let's go to that. It says weather normalization of customer usage on the remaining time-based rate plans will require hourly customer usage (and customer counts) by rate code. Do you see that?
- 21 A. Yes.
- Q. Would you describe how this hourly data would be used in the weather normalization process?
- A. So just to be clear, there's two different topics that we're discussing. One is normal weather and

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Page 405

the other one is weather normalization. Those are two different things. Normal weather is determined on the 30 years, the ranked normals that we obtain from MRCC. you're applying weather normalization, you're looking at how to apply normal weather to come to an adjustment to account for the differences between that normal weather and the actual weather. So the way we've done it historically, the assumption is that the -- we don't really care what happens when energy is used in a That we've been satisfied with that. particular day. Wе just need to come up with a daily total. Now that hourly rates are important, so it becomes a lot more, it would challenge a daily assumption that you would not apply a base factor to all hours of the day because just using physics, you're going to use more energy to cool down your house on a hotter day at the peak hours than what you would do on the same day to cool down your house in the morning.

The thermodynamic equation is quite clear if we just say that the heat transfer equation is a function of the differences in temperatures between what you're trying to cool your house down to and the outside temperature. So the idea that we can just apply daily factor and still get a correct result I think is really being challenged in here. That's why we need to look at

- the things on an hourly basis.
 - Q. That's because we've got 10 to 20 percent of the residential customers on a higher differential time of use rate?
 - A. Yes.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

2.2

23

24

- Q. In the past, has the Staff calculated daily weather estimates in order to arrive at class weather adjustments?
- A. Can you repeat the question. I'm not sure if I quite understand.
- Q. Has Staff calculated daily weather estimates in your weather normalization process in order to arrive at class weather adjustments? Do you make class adjustments?
- A. So I may be misunderstanding your question.

 I'll answer as -- So we will make -- we will calculate an adjustment based on the daily actual temperature and the daily normal temperature. And so when we get data, there's a couple of different data sets that we use. One data set is based off of what is billed and the other data set is based off of sample data that the Company provides on a daily basis. And so we use the shape of the daily basis to come up with an adjustment factor for each bill cycle and that becomes -- then gets totaled up into an adjustment on a revenue month for each large

- customer class. At least that's how we've historically done it.
 - Q. Is that based on hourly class AMI data or hourly class load research data?
 - A. There has been hourly data provided, but it has been based off of sample data is my understanding.
 - Q. This is an area that gets over my head quickly, but have you ever heard people say that ratemaking is more art than science?
- 10 A. Honestly, no, but I will accept.
- 11 MR. FISCHER: That's all right. Thanks.
- 12 | That's all the questions I have.
- JUDGE HATCHER: Thank you. Sorry. I've got to
 turn to my cheat sheet to make sure I go in the right
 order. It is, yes, okay, Commissioner and Bench
 questions. Are there any Commissioner questions for
 Mr. Stahlman? Hearing none, we'll go to Bench questions.
- 18 The Judge does have a couple.
- 19 QUESTIONS
- 20 BY JUDGE HATCHER:

2

3

4

5

6

7

8

9

21

2.2

23

24

25

Q. In your rebuttal testimony you described the process that Staff uses to develop its normalized weather related adjustments based on a regression analysis of two to three years of daily customer data and daily regional weather data. My question. Is that the same process

Staff has used over the years in electric rate cases?

- A. In electric rate cases, that's my understanding. Both utility and Staff have had very similar methods in approaching the weather normalization adjustment.
- Q. Is it Staff's belief that the implementation of AMI and the data it collects of each customer, is it Staff's belief that that should allow Staff to complete its weather related regression analysis for the development of all customer rates including TOU rates?
- A. Yes. With TOU rates, getting accurate hourly information will be very important and this is just to get the proper revenues because of the high differential. So if you're using energy at 6:00 a.m., you can be charged like 36 cents where if it's 6:00 p.m. -- reverse that. 6:00 a.m. you'll be charged 6 cents, 6:00 p.m., 36 cents. That's a very, very large difference in revenue. That's what we are worried about especially in the coming case.
- Q. Do Liberty or Empire and Ameren provide this customer data used for weather normalization same that Staff was asking of Evergy?
- A. Because Liberty and Ameren haven't had the large differential time of use rate customers, we haven't asked for it in a rate case yet. But based off of a

2.2

- working docket with Ameren's counterparty, it would be Dr. Nicholas Bowden, I believe this data would be available, and Ameren has also provided data more readily than what Evergy has historically. We've had difficulty -- they even went into a discovery conference in the last rate case.
- Q. Mr. Lutz in his surrebuttal testified that he doesn't know how Staff is going to use the weather data requested. His belief is that the process of how to do that is still under discussion. Is that related to your answer, your example about poker that you need to see the cards before you can make --
- A. Yes, that's precisely it. There is -- There's the theory that we know that energy is going to be proportionally used dependent on what the outside daily temperature is. That explains a lot. Plus, in this case too we have the time of use factor that is trying to encourage people to not use energy typically when it is really hot for the summer months. You're trying to shift usage to outside. And so we really need to start looking at the particular hours in which time energy is used and for the rate code to make sure that the weather response is the same or not.
- JUDGE HATCHER: Thank you. The Bench doesn't have any more. I'll ask the Commissioners just one more

1 time if any Commissioners have any questions. They do Let's go to recross-examination. 2 Mr. Clizer. 3 MR. CLIZER: Just very quick. 4 RECROSS-EXAMINATION 5 BY MR. CLIZER: 6 You would agree with me -- You had a quick 7 brief discussion with the Bench regarding AMI meter 8 deployment; do you recall that? 9 Α. Yes. 10 0. You would agree with me that AMI deployment 11 should make hourly data available by rate codes? 12 Α. Yes. 13 And for the sake of the record, AMI is advanced Ο. 14 metering infrastructure, correct? 15 Α. I think so. 16 No other questions. MR. CLIZER: Thank you. 17 Thank you. JUDGE HATCHER: That will take us 18 to the Company. 19 No questions, Judge. MR. FISCHER: 20 JUDGE HATCHER: Thank you. And redirect. 21 No questions, Judge. MS. KERR: 2.2 JUDGE HATCHER: Thank you. Mr. Stahlman, you 23 are excused subject to a very short period of recall. 24 Our next witness will be Ms. Kim Cox. Please come on

Thank you. Please raise your right hand.

25

forward.

Page 411

- 1 you solemnly swear or affirm that you will tell the whole
- 2 | truth during your testimony?
- THE WITNESS: Yes, I do.
- 4 JUDGE HATCHER: Thank you and your witness.
- 5 MS. KERR: Thank you. Good afternoon.
- 6 THE WITNESS: Good afternoon.
- 7 KIM COX,
- 8 having been first duly sworn, was examined and testified
 9 as follows:
- 10 DIRECT EXAMINATION
- 11 BY MS. KERR:

24

- Q. Could you please state your name for the record and spell your last name?
- 14 A. Kim Cox. Last name is spelled C-o-x.
- Q. And by whom are you employed and what's your position?
- 17 A. The Missouri Public Service Commission. I'm a research analyst.
- Q. And have you prepared and filed testimony in this proceeding, specifically the rebuttal testimony, your rebuttal testimony, on December 15, 2023, which has been marked as Exhibit 200 in this case?
- A. Yes, I did file rebuttal. I'm not sure on the

exhibit number. I'll take your word for it.

Q. And do you have any changes or corrections to

- 1 | make to that document?
- A. I would like to bring up that I do have a
- 3 different affidavit that has been filed within the case.
- 4 MS. KERR: And I have that -- That new
- 5 affidavit has been filed in EFIS.
- JUDGE HATCHER: Yes, it has. Any objections?
- 7 | So affidavited.
- 8 MS. KERR: I don't think I need to move to have
- 9 | it.
- 10 JUDGE HATCHER: I was being a little facetious.
- 11 No, it was a substitute affidavit. So without any
- 12 | objection and seeing none, I will accept the substitute
- 13 | affidavit. No need to provide me a copy.
- 14 BY MS. KERR:
- 15 Q. Okay. Other than the affidavit, are there --
- 16 do you have any changes or corrections to make to that
- 17 | rebuttal testimony that was filed?
- 18 A. No.
- 19 Q. So if I were to ask you the same questions that
- 20 | are set forth in that rebuttal testimony that was filed,
- 21 | would your answers be the same or substantially the same?
- 22 A. Yes.
- Q. And are those same answers true and correct to
- 24 | the best of your knowledge and belief?
- 25 A. Yes, they are.

1	MS. KERR: I offer Exhibit 200 into evidence
2	and tender the witness for cross.
3	JUDGE HATCHER: Thank you. You've heard the
4	motion. Are there any objections to the admission of
5	Exhibit 200? Hearing none. So admitted.
6	(STAFF'S EXHIBIT 200 WAS RECEIVED INTO EVIDENCE
7	AND MADE A PART OF THIS RECORD.)
8	JUDGE HATCHER: The witness has been tendered.
9	Mr. Clizer.
10	MR. CLIZER: Yes. Good evening or afternoon.
11	THE WITNESS: Good afternoon.
12	CROSS-EXAMINATION
13	BY MR. CLIZER:
14	Q. I would prefer not to but there was a question
15	that was deflected to you from Ms. Lange. So I'm going
16	to have to ask you. Do you have a copy of Schedule BDL-1
17	in front of you?
18	A. I do, but it is in black and white. So if you
19	would. Thank you.
20	Q. And I believe, if my memory recalls correctly,
21	this was awhile ago, the questions concerned data items
22	8c3 and 8c4. That would be on the opposite page. And I
23	believe a question I had posed to Ms. Lange was whether
24	or not the proposal set forth by the Company would fully

resolve the issue for Staff. And I believe -- I don't

- need to say what she answered. I'll just ask you the same question. Would the proposals set forth by the Company for those two completely resolve the issues in your opinion for Staff?
 - A. Resolve the issues for Staff, which I just want to make sure which issues. For these two specific ones?
 - A. So within my testimony, I do know that Ms.

 Lange did advise to ask me about these. I would like to state though within my testimony I do talk about 2, 3 and 4. So I'd like to leave it as her answer.
 - Q. Fine. Then in that case just to keep things moving along, does the answers to 2, 3 and 4 completely resolve this issue for Staff?
 - A. Do these answers within this?
- 16 Q. Yes.

O.

Yes.

17 A. No.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

18

19

20

21

2.2

23

24

- Q. And is the issue there one related to timing?
- A. So as Ms. Lange stated, 2 and 3 is in regards to the customer accounts. We see them I guess as one now based off of the testimony that's been provided. No. 4 is the usage, the hourly usage. So your question was are they resolved at this time?
 - Q. If the Company were to make the cost estimates necessary to make these deliverable, does that fully

1 resolve the issue in Staff's mind, in your mind, or are there other issues outstanding? 2 3 Α. With what I do in my analysis, it would be 4 resolved. 5 All right. No further questions. MR. CLIZER: 6 Thank you. JUDGE HATCHER: And Mr. Fischer. 7 Yes, Judge. MR. FISCHER: 8 CROSS-EXAMINATION 9 BY MR. FISCHER: 10 Ms. Cox, on page 2 you do talk about -- I'm 11 Sure, take your time. I was just going to refer 12 you to the top of page 2. 13 Α. Okay. 14 There you say you're really addressing data or 15 what we call the data set 2, 3 and 4. That's the focus 16 of your testimony, right? 17 Α. Correct. 18 Okay. And each of those three data areas Ο. 19 includes a subpart discussing service at different 20 voltages; is that right? 21 Α. Yes. 2.2 0. And are you seeking data for rate codes that 23 incorporate a voltage element like, for example, the 24 small general service secondary or small general service

Is that what you're kind of looking for?

25

primary?

Page 416

- A. Well, actually we're looking for this for all rate classes. Specifically residential is one of the top priorities for myself.
- Q. Even though it doesn't have a specific voltage element to it?
 - A. Correct.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

2.2

- Q. Is it true that the Company provides billing determinants and revenues by bill component which would include customer counts for the test year, the update period and the true-up by rate code and by voltage?
- A. So yes, the answer is yes, they do provide it. However, in the last rate case, the customer counts that they provided were questionable and had we had that information for the first and the last of the month, we would have known better what those customers were doing month to month. So I don't know if that answers your question.
- Q. I heard testimony I think from the previous or maybe it was from Ms. Lange, was it the last rate case where we were maybe four weeks or six weeks slower than somebody else?
 - A. I believe she testified that it was a month.
- Q. A month?
- A. I believe.
- 25 Q. And is that -- That's really significant to

your work?

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

2.2

- A. Yes. The closer we can get to realtime is definitely significant.
- Q. Okay. Are you able to determine switchers with customer accounts you currently receive from the Company?
 - A. For which class are we talking about?
- Q. I think we're talking about the residential class.
- A. For the residential class, actually in the last rate case I did ask for rate switchers and was advised that that was just too much information to provide.
- Q. Okay. On page 9 of your testimony, you provide information about the customer rate choice and switching activity that the Company has been reporting on in the EW docket on time of use rates?
 - A. Yes.
- Q. Have you been monitoring the subsequent updates on that?
 - A. Trying to, if I have time.
- Q. Have you noticed a high number of customers or that there are a high number of customers on the default peak adjustment rate?
- A. I do see that that is the highest number at this point in time.
- Q. Would you agree that there are really a small

amount of switching that has occurred thus far?

- A. I would agree thus far. We don't know what these customers are going to do in the future. When you put seasonality into it, they may be switching if they know how to work the system.
- Q. Is the sum of interval usage by interval, by rate code requested in data request set 4 expected to be used in adjusting the test year revenues or is it for rate design purposes?
- 10 Α. So the information that's requested is not used 11 to -- let me maybe if I can just kind of walk you through 12 Test year is test year. Those are actuals. 13 from there going forward, we do make adjustments at the 14 rate code level. I did in the last case, I made 15 adjustments at the rate code level, but I was not able to 16 to do weather normalization, MEIAA or 365 at the rate 17 code level. I was also not able to look at rate 18 switchers because I wasn't given the data to do so.
 - Q. We did get to the final end of that case though with new rates, right?
 - A. We did get to the end based off of the stipulation.
- Q. In your testimony, you detailed two data requests, 69 and 140?
- 25 A. Yes.

1

2

3

4

5

6

7

8

9

19

20

21

Page 419

Q. And on page 5 about line 15, you indicate that
both are not sufficient responses; is that right? The
response is directed to Staff to the Company's direct
testimony that did not provide any additional details.
Your answer to the question were the responses sufficient
I guess?

- A. So are you referring to --
- Q. On line 14.
 - A. So the response that Evergy provided to those two DR responses?
- 11 Q. Yes.

1

2

3

4

5

6

7

8

9

10

12

13

14

15

16

17

18

19

20

21

22

23

24

- A. Yes, because they direct me back to their direct testimony and then also stated that it was not available by the billing cycle. So yes.
 - O. Go ahead.
 - A. As has been stated, that information to the best of my knowledge is available. It's just the delivery of that information. And so therefore as a utility, I would think that they would also want to utilize that information and have that information available.
 - Q. Would you agree that Data Requests 69 and 140 are largely repetitive of the two sets of data we talked about, 2 and 3, that was noted on Mr. Lutz's schedule?
 - A. Somewhat. I would like to bring your attention

- though to it asking in detail of which rate codes that they could provide. So in the last rate case, for instance, we had net metering. That was actually included into another rate code. And the ending of the rate case actually now has those as their separate rate code. So this is asking more in detail which rate code, if any, can you give us and then it goes on to ask about billing cycle. If you're not able to deliver it by rate code, can you get to bill cycle level, is that an alternative? We don't know. This is just merely asking the Company what can you give us and the response was we can't.
- Q. So effectively you're really asking can you give us more detail on the answer you gave for 2 and 3?
- A. By rate code, yes, can you give us information, which rate codes can you give it to us, which ones can you not or can you at all. And the response was no.
- Q. Do those questions ask for data by billing cycle?
 - A. Can you -- I'm sorry?
- Q. Do your 69 and 140, are you asking for data by billing cycle?
- A. Yeah. As I just stated, that was an ask to see if that was available. We're looking, you know, as we've talked about throughout this hearing is alternative data.

- Yes, in the real world what I would like is as much data
 as I could possibly have to make sure that these billing
 determinants and these rate revenues are correct and that
 we're not just making an assumption of it looks good,
 let's just go with that.

 Q. That was an additional thing that wasn't
 included in the first -- the sets of data 2 and 3, right?
 - MR. FISCHER: Okay. That's all I have. Thank you very much.

JUDGE HATCHER: Thank you. And it is time for Bench and Commissioner questions. I don't typically like to interrupt witness testimony. We are going to take a break now. Let's come back at 3:15. The timing just works out a little too perfect. We'll come back with Ms. Cox for Commissioner and Bench questions, recross, redirect and then our last witness, Mr. Luebbert. Okay. We're at recess. 3:15. Thank you.

(A recess was taken.)

You're correct.

8

9

10

11

12

13

14

15

16

17

18

19

20

21

2.2

23

24

25

Α.

JUDGE HATCHER: Thank you all. Time of recess having expired and the Judge having arrived late. I appreciate your patience. Before we get to Commissioner and bench questions, let's revisit Exhibit 213. I have had some time to reflect. I'd like to hear another round of arguments to give everyone a chance to weigh in.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

2.2

23

24

25

On the table is the admission of Exhibit 213.

It's already been marked. It was previously rejected as an exhibit. Mr. Clizer made a motion to reconsider which was denied. The Judge is going to bring up a motion to reconsider.

So let's start with -- I'll start with Staff and we'll end with Mr. Fischer. Staff, tell me why Exhibit 213 should be admitted into evidence.

MS. SCURLOCK: Thank you, Your Honor. At this stage, the exhibit has been referenced multiple times. Ι think that Staff has made it clear that we at least are referencing this exhibit in terms of looking back at the data that we have received historically compared to the data that we are seeking in this case. There were also subjects brought up in Mr. Lutz's surrebuttal that Staff did not have the ability to rebut because of the timing of when those issues were brought up, and some of that goes to Staff's role in looking at rate structure. And we believe that that goes back to that 1996 order.

JUDGE HATCHER: Mr. Clizer.

MR. CLIZER: Not to repeat too much what was just said but the document has been referenced multiple times. I think at one point the witness did something. This document speaks for itself. I feel like it would be imprudent to have the record have this interpretation of

Page 423

1 a document without the document available for the 2 Commission to draw its own conclusions based on. 3 final point, I'll just stand on the fact that I believe 4 the original objection was to relevance and the standard 5 for relevance is whether its value is more probative or 6 I don't see how this document being entered prejudicial. 7 in the record at this stage is prejudicial to any party 8 but it clearly has probative value. 9 JUDGE HATCHER: Mr. Fischer. 10 MR. FISCHER: I think originally we objected on 11 the grounds it could have been added with the Staff's 12 rebuttal testimony, but Judge, in the spirit of 13 cooperation, Evergy will withdraw its objection to it. 14 JUDGE HATCHER: So admitted, Exhibit 213. 15 Thank you. 16 (STAFF'S EXHIBIT 213 WAS RECEIVED INTO EVIDENCE 17 AND MADE A PART OF THIS RECORD.) 18 JUDGE HATCHER: Let's move on to Witness Kim 19 Cox. We have Commissioner and Bench questions. 20 there any Commissioner questions? Chair Rupp. 21 CHAIRMAN RUPP: Not a question, it's a comment. 22 Congratulations on employee of the month --23 THE WITNESS: Thank you. 24 CHAIRMAN RUPP: -- for February. 25 THE WITNESS: Thank you.

	CHAIRMA	AN RUL	PP: (Just war	nted	d to	let eve	rybody
that didn'	t know	that	that	you're	in	the	presenc	e of
greatness.								

THE WITNESS: Thank you.

JUDGE HATCHER: Thank you, Chairman. Are there any other Commissioner or bench questions? Any other Commissioner questions? Hearing none. The bench does have just a couple. Check my list.

QUESTIONS

BY JUDGE HATCHER:

- Q. What additional value is the billing cycle data when Evergy already provides rate code data for the first and last day of each month? Let me repeat that. If Evergy already provides rate code data for the first and last day of each month, rate code data, what additional value is the billing cycle data?
- A. Are you referring to the DR asking if they have it at bill cycle level or are you wanting to know what the value would be getting it on the hourly level?

As far as the hourly, like others have stated with the high differential that we're going to have, for me to do my analysis I have to know where that usage is in order to apply the correct rates. I have to know and Michael Stahlman when he was discussing weather normalization, as of today when he gives me the weather

1	normalization factor, I apply that at rate class. And
2	with what has been presented today, we're anticipating
3	customers hopefully using their electric differently
4	based off of what rate plan they're on. And so therefore
5	in order for me to calculate the revenues, I'm going to
6	need to know where that usage is falling. So at the rate
7	code level, I hope I'm answering your question. And so
8	bill cycle level, I haven't given it a great deal of
9	thought because it was an alternative to what we
10	originally asked for and I would need to think about it
11	in order to actually provide you a concrete answer.
12	JUDGE HATCHER: Thank you. That was all that I
13	had. That will take us to recross and redirect.
14	Mr. Clizer.
15	MR. CLIZER: No questions. Thank you, Your
16	Honor.
17	JUDGE HATCHER: Mr. Fischer.
18	MR. FISCHER: No questions. Thank you.
19	JUDGE HATCHER: And redirect, Ms. Kerr.
20	MS. KERR: Yes, I just have a couple questions.
21	REDIRECT EXAMINATION
22	BY MS. KERR:
23	Q. In response to the question the Judge just
24	asked, it sounded like the Judge was under the impression

that you currently receive customer accounts by rate code

- for the first and last days of each month. Currently in rate cases does Evergy provide those costs for the first and last day of the month?
 - A. No, they do not. They give customer counts for the customers that were charged that month.
 - Q. Do you know if bill cycle data is used for weather normalization?
 - A. Yes, it is.

5

6

7

8

9

12

13

14

15

16

18

19

2.0

21

2.2

23

24

25

- Q. And Mr. Fischer -- never mind.
- MS. KERR: I don't have any other questions.

 Thank you.
 - JUDGE HATCHER: Thank you, Ms. Cox. You are excused from the stand subject to a very short period of recall. And we'll get our next witness, Mr. Luebbert, which if I double check real quick is our last witness; is that correct?

17 MS. KERR: Yes.

JUDGE HATCHER: After we get done with Mr. Luebbert, I'm going to go ahead and let the Commissioners know that we'll be wrapping up just some items after that. But what we will be addressing is going to be the exhibits, we have at least three that I have notes on. I also want to run through each party's exhibit list to make sure I have everybody's exhibits that they offered and wanted on the record.

Page 427

1 Mr. Luebbert, raise your right hand. Do you 2 solemnly swear or affirm that you will tell the whole 3 truth during your testimony? 4 Yes, I do. THE WITNESS: 5 Thank you, sir. Your witness. JUDGE HATCHER: 6 Thank you. It's still afternoon. MS. KERR: 7 Good afternoon. 8 THE WITNESS: Good afternoon. 9 J LUEBBERT, 10 having been first duly sworn, was examined and testified 11 as follows: 12 DIRECT EXAMINATION 13 BY MS. KERR: 14 Could you please state your name for the record 15 and spell your last name? 16 It's the letter J Luebbert, L-u-e-b-b-e-r-t. Α. 17 And by whom are you employed and what's your Ο. 18 position? 19 I'm employed by the Missouri Public Service Α. 20 Commission, part of Staff, and I am the tariff and rate 21 design manager. 22 Ο. And have you prepared and filed testimony in 23 this proceeding, specifically rebuttal testimony, that 24 was filed on December 15, 2023, which has been marked as

25

Exhibit No. 202?

1 A. Yes.

4

5

6

7

- Q. And do you have any changes or corrections to make to that document?
 - A. I don't believe so.
 - Q. If I were to ask you the same questions in that document today, would your answers be the same or substantially the same?
 - A. They would be substantially the same.
- 9 Q. Are those same answers true and correct to the 10 best of your knowledge and belief?
- 11 A. Yes.
- MS. KERR: And so I offer Exhibit 202 into evidence and tender the witness for cross.
- JUDGE HATCHER: Thank you. You've heard the motion. Are there any objections to the admission of Exhibit 202? Hearing none. It's so admitted.
- 17 (STAFF'S EXHIBIT 202 WAS RECEIVED INTO EVIDENCE
- 18 | AND MADE A PART OF THIS RECORD.)
- 19 JUDGE HATCHER: Witness has been tendered.
- 20 | Mr. Clizer.
- 21 MR. CLIZER: No questions. Thank you, Your
- 22 | Honor.
- JUDGE HATCHER: Mr. Fischer.
- MR. FISCHER: Just briefly, Judge.
- 25 CROSS-EXAMINATION

BY MR. FISCHER:

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

20

- Q. Mr. Luebbert, as the manager of the tariff and rate design department, do you set the policy objectives of that department?
 - A. Do I set the policy objectives of the department?
 - Q. Yes.
 - A. I suppose that I have input, but I wouldn't say that I would set objectives without input from others.
 - Q. Okay. Well, would you do things like review and approve the testimony of the people in your department?
 - A. Absolutely.
- Q. And would you review and approve the data requests that are issued by your department in cases before the Commission?
- A. Most of them, yes.
- Q. Did you specifically review the 200 or so that were issued in this case?
 - A. I reviewed the data requests that were issued in this case.
- Q. Okay. Have you specifically directed your
 Staff to prepare a distribution study for Evergy?
- A. I have not specifically individually told Staff to go and do that, no.

- Q. Would you have reviewed and approved the power point presentation that Ms. Lange presented to Evergy on August 9 regarding rate modernization?
 - A. I did review --
- 5 MS. KERR: Objection. I don't think it was
- 6 August 9.
- 7 MR. FISCHER: I'm sorry. Did I say -- August
- 8 28.

18

19

20

21

2.2

- 9 THE WITNESS: You're talking about the power 10 point presentation that you handed Ms. Lange earlier,
- 11 | correct?
- 12 MR. FISCHER: Right.
- 13 THE WITNESS: I did review that.
- 14 BY MR. FISCHER:
- Q. Okay. Did you approve that as policy for the department?
 - A. I think that power point includes some disclaimer language. So it was part of a discussion as part of kind of a collaborative workshop discussion.
 - Q. Okay. Would you have reviewed and approved the filing of the Staff complaint about this particular case data collection proceeding?
- A. I believe at this point Staff hasn't provided testimony in the complaint docket.
- Q. That's correct.

1 So I have been involved in some discussions Α. 2 about the complaint. 3 Q. Would you have approved it? I'm sorry. Go 4 ahead. 5 At this point, I think the complaint was Α. 6 provided by an attorney which I don't have, I'm not 7 tasked with. 8 So you wouldn't have necessarily approved that Ο. 9 filing? 10 I've been involved in the discussion. Α. Ι 11 understand why it's being filed, and obviously some of 12 the issues that are raised within that docket are related 13 to some of the dockets that Staff within my department 14 are involved in. 15 0. I think all of them are involving your 16 department, right? 17 I'm going to object to this line of MS. KERR: 18 questioning. The complaint is a separate case than this, 19 and I don't know where we're going with this. MR. FISCHER: 20 Judge, it involves the same exact 21 data, the same exact requests that were part of this 22 case. 23 MS. KERR: It's not part of this case. 24 separately docketed case.

JUDGE HATCHER: Mr. Fischer, if you could

- 1 | continue, please.
- 2 MR. FISCHER: All right.
- 3 BY MR. FISCHER:

20

21

22

23

- 4 Q. On page 4 of your rebuttal --
- 5 JUDGE HATCHER: I'm sorry. I apologize. Ms.
- 6 Kerr had cut you off and I wanted to hear the rest of your answer to her objection.
- MR. FISCHER: Well, my concern that Staff
 complaint involves the basic allegations that were made
 in this same data retention case. It also involves
 allegations about the rate modernization discussions that
 have occurred that we were not forthcoming or that those
 need to be ordered -- the Commission needs to order us to
 do that. I was just pursuing that, that line. Certainly
- 16 JUDGE HATCHER: Ms. Kerr.

they're directly related to this case.

- MS. KERR: Evergy is asking the Commission to order the rate modernization. We aren't. Staff is not in this case.
 - MR. FISCHER: Well, Judge, I think the testimony in this case is that the data is needed to evaluate not only Evergy's rate modernization proposals but also the Staff's, to assist it anyway.
- MS. KERR: I think that's a mischaracterization of the testimony that has been presented so far.

attorney-client privilege.

- JUDGE HATCHER: Yes, I'm going to agree with 2 Staff on this.
- 3 MR. FISCHER: Okay. I'll withdraw it. Thank 4 you, Judge.

BY MR. FISCHER:

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- Q. On page 4 of your rebuttal testimony, you discuss information asymmetry. And on line 20 you state when the utility, in this case Evergy, indicates that the data or information cannot be provided because it is not retained in a manner that can be provided to the requesting party, this prohibits the other parties to fully undertake the required analysis; is that right?
- A. I think that's an accurate reread of my testimony.
- Q. Okay. Mr. Luebbert, who decides what is the required analysis that needs to be performed?
- A. I think the answer probably depends on the context. I think in this question and answer I'm talking kind of broadly about asymmetric information and I mean, this speaks generally to information that maybe is available to the Company but not being provided to another stakeholder based on I guess format.
- Q. Well, the required analysis that you're discussing means the analysis that a party wants to perform; isn't that right?

A. It probably depends on the context.

- Q. Let's if -- It's the required analysis that some party wants to perform irrespective of the cost or the parameters of creating the data or information; wouldn't that be true?
- A. I'm sorry. Can you restate your question? You're specifically asking about cost of provision of data?
- Q. I'm specifically asking about your testimony where you say that when a utility, in this case Evergy, indicates the data or information cannot be provided because it's not retained in a manner that could be provided to the requesting party, this prohibits the other parties to fully undertake and the term is the required analysis. I'm just trying to understand what is that required analysis in this situation?
- A. So specific to this case, the information that Staff is looking for has been described I think very well by Ms. Lange. Her testimony describes well not only within the context of this case but her testimony in the last few rate cases has described some of the difficulties that she's had in getting information that would be necessary for her to undertake an analysis to provide a reasonable class cost of service study.
 - Q. And we're talking in a broader context I think

- in your testimony about the theoretical asymmetric versus symmetric ability of other parties to access the information available to the utility, right?
- A. I do think this question and answer is broader than that, broader than the context of this case, but I think your question kind of narrowed that.
- Q. It did a little bit, but let me broaden it again. The required analysis in a case may not have been anything ordered by the Commission, right?
- A. There may be things that aren't explicitly ordered by the Commission that would be required to do a reasonable analysis and provide information or a reasonable recommendation to the Commission.
- Q. And a required analysis might not be relevant to the case but some party thinks it would be helpful to their position; isn't that right?
- A. I think in the context of this case and the information that Staff has been seeking Staff's opinion has been that the information sought is necessary to provide reasonable recommendations to the Commission. I know that earlier you asked a specific question about cost and at what cost does that maybe become prohibitive. I think Ms. Lange testified earlier and within our position statements we've provided that our request wasn't ignoring the cost of being able to get some of

this data that's been asked in the past.

- Q. I appreciate that answer. And I'm trying to understand the symmetric versus asymmetric issue. Isn't the cost of creating and producing data and information for that required analysis that you're talking about an important factor in determining whether the data and information should be produced?
- A. I do think that the cost of being able to produce information is an important factor, and I think that is consistent with Staff's position in this case.
- Q. Yeah. And Staff has now concluded that it would be imprudent to spend 80 to \$100 million to get that data in data set number 1.
- A. I don't think that Staff's position has ever been that it should take 80 to \$100 million or that we would recommend that the Commission order Evergy to do that.
- Q. Is there anyone on Staff that has the expertise to testify about what it would cost to modify computer systems and various systems to obtain that kind of data?
- A. I don't have -- I don't have a computer science degree. Staff has a lot of employees with differing backgrounds and with different expertise. I can't say with certainty that we don't have somebody that could estimate some cost of doing some database designs or

Page 438

- redesigns, but that isn't the -- I don't know even though that's something that Evergy seems hung up on in this case and seems to be misinterpreting Staff's position to the Commission, that hasn't been the impetus from Staff's point of view. Staff's been trying to obtain information that can reasonably be had at a reasonable cost in order to inform several different areas, a few of them being determining what appropriate revenue amounts are within the context of general rate cases, and then trying to understand pricing differentials that occur within Evergy's current tariffs and what we assume Evergy may propose going forward.
- Q. Is there any place in the Staff's rebuttal that I should go to find what Staff would view as the cost of producing that information? You didn't put anything in your rebuttal on that, did you?
- A. So our rebuttal is responsive to the Company's direct testimony which includes little to no cost estimates on individual cost components.
- Q. And Staff's testimony doesn't have any at all, right?
- A. I don't believe that Staff has cost estimates included within its rebuttal testimony.
- Q. Thank you. That's the question. Let me change roles with you. How would you describe your department's

Page 439

- role in presenting tariff and rate design recommendations in cases before the Commission?
 - A. How would I describe our role?
- Q. Yes.

1

2

3

4

5

6

7

8

9

10

11

13

14

15

16

17

18

19

20

21

22

- A. In presenting tariff and rate design recommendations in front of the Commission?
- O. Yes.
 - A. That is the role of our department.
 - Q. Okay. Let me ask you more specific questions then. Is it your role to evaluate the Company's tariff and rate design proposals?
- 12 A. It is.
 - Q. Is it your role to recommend improvements to the Company's rate design proposals?
 - A. It is. And I'm -- If you're going to continue with questioning specific components, I do want to add a caveat that among other things, yes, it is, because I don't want it to be limited to just that. My department deals with a lot of different cases. And I'm sure it shouldn't be a surprise that with a department name including tariffs and rate design that we get pulled into a lot of different cases other than just a general rate case or a tariff filing.
- Q. Sure. That's for certain. I missed one of my questions and I think it's an important one since you've

	Page 440
1	been around the Commission a long time. Is it your
2	understanding based upon your years of experience here at
3	the Commission that public utilities and other parties
4	are not expected in discovery to perform additional
5	analysis where the data does not exist or where the
6	analysis has not been previously performed?
7	MS. KERR: Objection, speculation, calling for
8	speculation.
9	JUDGE HATCHER: Mr. Fischer.
LO	MR. FISCHER: I'm not asking for speculation.
L1	I'm asking what his experience is at the Commission with
L2	regard to in discovery whether utilities are expected to
L3	do additional analysis or produce data that doesn't
L4	exist.
L5	JUDGE HATCHER: I agree. Objection overruled.
L6	THE WITNESS: So I would say that probably one
L7	of the most common objections that we see to data
L8	requests from various companies is something along those
L9	lines.
20	BY MR. FISCHER:
21	Q. And those are sustained?

I wouldn't say that for the most part the Α. objections are -- I don't want to give a number. there are a lot of data requests within a slurry of cases that companies will object, kind of provide a blanket

22

23

24

Page 441

- objection to we'll use this case as an example, nearly every single data request but then provide some sort of answer.
- Q. Well, I'm just asking most of the time utilities aren't required to produce stuff that doesn't exist, right?
- A. So I think this is a really interesting question. I'm glad that you asked it. I think this is part of the reason that we're here today. What we're hearing from the Company is that you have information available but it isn't in a format that is useful or that you can't provide it to Staff.
 - Q. At a reasonable cost?
- 14 MS. KERR: Objection, he's testifying.
- 15 JUDGE HATCHER: I'll withdraw that.
- 16 BY MR. FISCHER:

1

2

3

4

5

6

7

8

9

10

11

12

- Q. Let me ask you this question. In the context
 of discovery, not -- The Commission can order the utility
 can do a lot of things; but in the context of discovery,
 wouldn't you agree that based on what you've seen most of
 the time utilities aren't required to produce things that
 don't exist?
- MS. KERR: I'm going to object. I think he's asking for a legal conclusion here.
- MR. FISCHER: There's nothing legal about it.

It's just are utilities asked to produce information that doesn't exist in discovery.

JUDGE HATCHER: I understand that it could be construed as a legal question. However, I know that it was brought up in the discovery conference and it certainly has been an underlying issue in this case. I'm going to go ahead and allow it. As far as Mr. Luebbert's opinion goes, the Commissioners can take that and interpret that on their own.

THE WITNESS: So I think something that is regularly becoming an issue is that Staff is asking for information from, I'll use Evergy as an example because we're here today.

BY MR. FISCHER:

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- Q. I think I asked you a yes or no question on that. Can you answer it yes or no?
 - A. Could you reask the question? I'm sorry.
- Q. Yeah. Rather than have Bev read it back.

 Isn't it true that in discovery utilities are not typically asked to produce things that don't exist?
 - A. I think so, for the most part.
- Q. Okay. Thank you. Moving right along. Is it Staff's role in your opinion to recommend rate design proposals that are fundamentally different from those proposed by the Company?

	Evidentially Floating Standary 61, 20
1	Page 443 MS. KERR: Objection, relevance.
2	MR. FISCHER: One of the issues in this case is
3	the role of Staff in presenting rate design proposals and
4	we're asking for guidance from the Commission on how that
5	should go forward and that goes directly to that
6	question, Judge.
7	MR. KERR: I think the issues in this case is
8	whether Evergy is able to provide the data and how much
9	it's going to cost if they don't have the data, not rate
10	design. This isn't a rate case.
11	JUDGE HATCHER: The parties were not able to
12	agree on the issues. So the Commission will The
13	Commissioners will have to determine what the issues are
14	in the case. Right now, Mr. Fischer and Evergy have
15	presented a question as an issue to the Commission please
16	give us guidance on how rate
17	MR. FISCHER: Design.
18	JUDGE HATCHER: design should be moving
19	forward. I paraphrase terribly. In order to allow
20	Evergy to develop that issue with testimony and evidence,
21	I'm going to allow the question while acknowledging that
22	this may never end up being an issue in this case.

23 MS. KERR: Understand.

Mr. Fischer, go ahead. 24 JUDGE HATCHER:

25 BY MR. FISCHER:

Q. I think the question was is it the Staff's role	
in your opinion to recommend rate design proposals that	
are fundamentally different from those proposed by the	
Company?	
A. So within the context of a general rate case,	

- A. So within the context of a general rate case,
 Staff conducts an independent audit, proposes that we
 file direct testimony proposing what our recommended
 level of rate increase is, as well as providing direct
 testimony based on class cost of service and rate design.
 The other intervenors within the rate cases that I've
 been a part of have included recommendations on rate
 design that aren't necessarily exactly tied to what the
 Company has proposed. I don't think that recommending -making recommendations on rate design that may be
 independent of exactly what Evergy is proposing is
 anything new.
- Q. Would you agree that it's not the role of the Staff to manage the business of the public utility?

 MS. KERR: Objection, relevance.

JUDGE HATCHER: Mr. Fischer.

MR. FISCHER: It's the same topic, Judge, the role of the Staff in presenting rate design testimony.

If you recall in my opening, I did make a point of that.

JUDGE HATCHER: Yes, but this question is about managing the business.

MR.	FISCHER:	Correct.	It's the r	cole of the
Staff is what	I'm asking	g is the r	role of the	Staff to
manage the bu	siness.			

JUDGE HATCHER: I'm going to side with Ms. Kerr on this. This does seem to go at least a toe over the line there.

BY MR. FISCHER:

2.2

Q. When you're making recommendations to the Commission that are fundamentally different from the Company on rate design, how do you decide that it's not stepping into the role of management of the utility?

MS. KERR: Objection. I think it's the same question, just asked a different way. Object as relevance.

JUDGE HATCHER: I've got to say because of the rewording I now see the question in a slightly different light. Mr. Fischer, can you respond to the objection?

MR. FISCHER: Your Honor, one of the issues is at what point does the Staff have the ability to make independent recommendations to the Commission that require the utility to create and do analysis in order to make those recommendations. That's the fundamental reason that in some instances the utility would be asked to do analysis and prepare data that doesn't exist so that they can make an independent recommendation. That's

1 | where this is going.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

JUDGE HATCHER: I'm following all that. But you tied it to business practices and that's where I'm on the fence because on the one hand I could see in Evergy's favor ruling on this because at some point coming up with a rate design might get to that high level of managing a business, which makes me regret my previous ruling, but on the other hand I don't know that's really where you're going.

MR. FISCHER: If it's not clear to the Judge, I'll move along. We can move this along.

JUDGE HATCHER: Okay. Thank you.

BY MR. FISCHER:

- Q. Let me go to some other roles of the Staff. Is it the role of the Commission Staff to be fair, objective and unbiased in your opinion?
- A. I think that Commission Staff does strive to be fair, objective and unbiased. I do think that there are times that we are provided direction that we need to provide an assessment on with kind of in certain light, but generally those are three things that we do strive for.
- Q. Is it the role of the Commission Staff to be as strong and aggressive protector of the ratepayer interests.

Page 447

1	JUDGE HATCHER: Yeah
2	MS. KERR: Objection. Where are we going?
3	Relevance. Where are we going with this?
4	JUDGE HATCHER: Okay. Your objection is
5	relevance.
6	MS. KERR: And legal conclusion.
7	JUDGE HATCHER: Mr. Fischer, response.
8	MR. FISCHER: Again, it's going to the role of
9	the Staff in presenting testimony in front of the
LO	Commission on rate design and the requirement to have the
L1	utility prepare an analysis and create data that doesn't
L2	exist. I'm just asking what is his view as the director
L3	of the tariff division, what is his view of the role of
L4	Staff here. That's what I'm asking.
L5	JUDGE HATCHER: I don't think that was the
L6	question asked though.
L7	BY MR. FISCHER:
L8	Q. Is it the role of the Commission Staff to be a
L9	strong and aggressive protector of the ratepayer
20	interests?
21	JUDGE HATCHER: A strong and protective?
22	MS. KERR: I also object as it being vague.
23	JUDGE HATCHER: I was going to go with vague.
24	MS. KERR: I'm not exactly sure what he's
25	asking.

BY MR. FISCHER:

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

2.2

23

24

25

- Q. Let me ask something more specific then, Judge. I'm sorry if I'm being vague. From your perspective, is it the role of the Commission Staff to present a case that's intended to keep the rates of residential customers as low as reasonably possible within the confines of the law?
 - MS. KERR: Objection. I'll withdraw that.

 JUDGE HATCHER: Mr. Luebbert.
- THE WITNESS: Your question is -- I guess could you restate your question. I was writing and I'm not sure that I got all of it.

BY MR. FISCHER:

- Q. From your perspective as the department head, is it the role of the Commission Staff to present a case that's intended to keep the rates of the residential consumers as low as reasonably possible in the confines of the law?
 - A. I don't think that is necessarily their role.
- Q. Is it the role of the Commission Staff to make recommendations in a rate case that are designed to keep the public utility financially healthy?
- A. It's the role of Commission Staff to provide recommendations that are reasonable based on facts and information that are available. In this case we're

2.2

Page 449

talking about information that isn't available and is
making it difficult for us to make recommendations on the
reasonability of what the studies are or what the rate
differentials are. That's really why we're here. We're
trying to get some sort of trying to get some
information that will give some sort of clarity on some
of those rate differentials and then making sure that we
can have information available to us during the next rate
case or a rate case a year from now or two years from now
that allows us to do studies to make sure that we are
making adjustments that are in line with what the data
tells us.

- Q. Do you disagree that it's the role of the Staff to make recommendations in rate cases that are designed to keep the public utility financially healthy?
 - A. I don't disagree with that, no.
- Q. Okay. When you're making those recommendations, do you try to have your department follow policies that were established by the Commissioners through previous orders?
- MS. KERR: Objection, vague, relevance. What does he mean by policy? Where are we going with this? There's so much.
- JUDGE HATCHER: Thank you, Ms. Kerr. The objection that I heard was relevance and vagueness.

It's

1 Mr. Fischer. 2 I think the question is pretty MR. FISCHER: 3 specific; but if you don't want me to ask it, I'll 4 withdraw it. 5 I'm not saying anything. JUDGE HATCHER: Thev 6 objected. 7 I think it's quite specific. MR. FISCHER: 8 JUDGE HATCHER: Okay. And the question was do 9 you follow that policies interpreting those from previous 10 Commission decisions? 11 MR. FISCHER: That's correct. 12 MS. KERR: What does he mean by policy. 13 Can you clarify policy or JUDGE HATCHER: 14 reword the question? 15 BY MR. FISCHER: 16 When the Commission issues an order, do you try Ο. 17 to follow it? Staff does follow Commission orders, yes. 18 Α. 19 also try to bring to the Commission's attention when 20 companies may not follow those orders. 21 How would you decide when Staff should advocate Ο. 2.2 a position that differs substantially from a past order? 23 MS. KERR: Objection. Asking for speculation 24 and for him to make a decision on what Staff would do

generally. He can't make a decision on that.

Page 451

1	asking for him to make a conclusion, legal conclusion.
2	MR. FISCHER: Judge, this is the manager of the
3	tariff and rate design department. He I think at least
4	has a role in setting the objectives of the Department.
5	I'm asking whenever they decide to advocate something
6	that is different from the policies that might have been
7	established in a previous order, how do they decide to do
8	that.
9	JUDGE HATCHER: I'm going to need an example.
10	BY MR. FISCHER:
11	Q. Okay. For example, if you have a Commission
12	that's issued a rate design order that has residential,
13	small general, large general and industrial classes, if
14	you were going to make a decision to get rid of the
15	customer classes, what would cause you to do something
16	like that?
17	A. So Staff wouldn't be able to just remove those
18	class distinctions in and of itself.
19	Q. Would Staff
20	A. The Company
21	Q. I'm sorry. I didn't mean to interrupt.
22	A. No, and I'm sorry, I didn't mean to cut off
23	your question.
24	Q. For example, if the Staff recommended a

continuous rate design proposal, which is different from

Page 452 1 what we have today, what would cause you to make a 2 decision to recommend that kind of a proposal as a path 3 to the future? 4 Α. So --5 Are we talking hypotheticals here? MS. KERR: 6 The question is on the table. MR. FISCHER: 7 I know. And there's -- Is that JUDGE HATCHER: 8 an objection? 9 MS. KERR: Sure, yes. I mean, if it's just 10 hypothetical, are these -- My objection will be facts not 11 in evidence. 12 I have occasionally helped JUDGE HATCHER: 13 various parties with questions in the interest of getting 14 information to the Commissioners. I'm going to try that 15 now without unduly imposing hopefully. So Mr. Fischer, 16 if I get it wrong, speak up. Counsel, feel free to 17 object or speak up. I think the question is when or how 18 did Staff decide to move to rate modernization or start 19 rate modernization. Is that where we're going? 20 MR. FISCHER: That's a fair question, Judge,

That's a good road map for a path forward on this question, yes.

21

22

23

24

25

MR. CLIZER: I'm sorry. Just really quick on the question that you just posed is the Commission presupposing that Staff has made a determination on how to proceed at this stage?

JUDGE HATCHER: Yeah, I'm struggling with the wording, because Mr. Clizer is right, my question does that. I don't want to presuppose that, which I think is where I think a lot of the objections were coming on the question and I'm trying to help out so we can just get the question. Maybe what caused Staff to feel that a prior ratemaking scenario should be updated.

MR. FISCHER: I think, Judge, you asked me to give an example. The example that I was asking was if we have a current existing rate structure, what would cause Staff to decide to go to a continuous rate structure proposal.

JUDGE HATCHER: Is this a continuous rate structure proposal?

MR. FISCHER: It's in the rate modernization plan.

MS. KERR: That's not in evidence.

JUDGE HATCHER: We're talking about the data requests. While rate modernization is certainly maybe a portion and it might be driving some of this, I'm not sure that that particular question is going to be relevant.

MR. FISCHER: I will withdraw the question,

Judge. To move this thing along, I think I've asked the

- 1 questions I need to ask I guess.
 2 BY MR. FISCHER:
 - Q. As an engineer, Mr. Luebbert, one last question, you understand that creating and producing data in a complex information system may not be just as easy as pressing a button or hiring a new computer programmer, right?
 - A. That's certainly possible.
 - MR. FISCHER: That's all I have, Judge. I'm sorry to belabor the cross here.
 - JUDGE HATCHER: That's okay. Thank you, Mr. Fischer. That will take us to Commission questions. Are there any Commissioner questions for Mr. Luebbert? Give a second for those on WebEx. Hearing none. The Commission -- the Bench does have just one.
- 16 QUESTIONS
- 17 BY JUDGE HATCHER:

4

5

6

7

8

9

10

11

12

13

14

15

18

20

21

22

23

24

- Q. I'm referencing page 4.
- 19 A. Of my testimony?
 - Q. Of your rebuttal, yes. Your testimony had recommended that the Commission order Evergy that Evergy ensure access to actual hourly customer load data by rate code and ensure access to accurate customer counts by rate code and that that access would, if it was timely, would avoid months of regulatory lag when processing rate

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

cases. Here's my question. Would Evergy providing that information through monthly non-case related submissions into EFIS? If Evergy filed the information that you asked for in a monthly non-case related submissions into EFIS, would that eliminate that issue?

So I guess I want to, if I can, just clarify a little bit. The list of items -- I was trying to read page 4 and see. I think they're maybe on another page but it didn't sound like it was misquoted or anything. Ι think Evergy brought up this concept at some point that, you know, Staff may be seeking kind of like this untethered access to their systems. That's really not what we're looking for. With some of the customer and usage information, Ms. Lange talked about it. Ms. Cox also talked about it. We really need that information within the context of general rate cases, but it happens multiple times within the context of those So Evergy typically sets a test year, Staff will cases. usually recommend an update period which kind of gets information more current. Ideally we'd like to get that information as current as we can while also providing us with time to be able to do our analysis, make our recommendations, discuss internally, have testimony drafted and reviewed. So kind of the ability to get that information up to date in a relatively short amount of

time would be important or at least would reduce some of that lag going forward because it would allow us to push our update period further in time or closer to realtime.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Some of that information is also needed for the true-up period. Having that true-up period -- Having the information for the true-up period in a shorter time frame would also be helpful.

I think I brought up a couple other instances where some of this information, and maybe Ms. Lange does too, but within the context of some of the MEIAA filings, this may be helpful information as well. It isn't something that I necessarily think Staff needs or wants monthly every single month from now until the end of time or something. But we do need the information and it needs to be able to be provided in a timely fashion. So that when I'm talking about that information, I'm specifically talking about customer count, customer usage by hour, that type of information. Some of the information that's included I think as we were talking about it I know there's been, I'm trying to make that clarification, but in the term referenced, term one referenced in the Stipulation and Agreement, some of that information obviously doesn't need to be provided monthly but, and I think Ms. Lange talks about the importance of being able to go and look at what that cost information

- looks like over time, and the fact that some of that data has not been updated in a very long time and we're just due to do so.
- I'm sorry. Did I -- Does that answer your question?
 - Q. Yes, thank you.

- A. I think the short answer is we wouldn't necessarily have to have it monthly. We need the information relatively quickly in time periods that we do need it.
- Q. In the interest of finding common ground, I just want to clarify timeliness. I thought that the testimony established that 18 months back from the beginning of a rate case is when the data that you get usually starts and that's why by the time we get to the rate case it was untimely. Is that a fair statement?
- A. I think that when you're talking about the 18 months back, I think -- thinking of the last few Evergy cases that I've been involved in, I think, test years that are roughly kind of on a six-month lag from when they file, I think that is roughly accurate. We have had issues getting information for update periods and that is not something that probably has a lot of testimony in front of the Commission because generally some of those discussions are occurring within the context of trying to

- set the procedural schedule and so as we're doing that we're trying to look at what is the date that you can reasonably provide us information for month X and that month X may need to shift in order to allow us time to review and provide recommendations for that update period.
- Q. And I'm sorry. I should have just asked what I meant to ask. Out of the timeliness discussion, am I hearing correctly that moving the data from Evergy up a couple months is the timeliness issue? Instead of 18 months, if it was 16 or 15, the same with the update period, if it was just -- are we talking just a little sooner?
 - A. I --

- Q. I don't want to put you on the spot to pick a number. I'm trying to see if there was some --
- A. I do think that the availability for information that is closer to the time of our direct filing has been more difficult or I guess the data has been staler, I'm not sure if that's a term, more stale, with Evergy in the past few rate cases than other companies have been able to provide.
- JUDGE HATCHER: Okay. Thank you. That's all the questions I have. I have taken too long. I will ask again if any Commissioner questions -- if any

Commissioners have a	ny questions.	It is *6 to	unmute for
Commissioners on Web	Ex. Hearing n	none. We'll g	go back to
recross-examination.	Mr. Clizer.		

MR. CLIZER: Very quickly.

RECROSS-EXAMINATION

BY MR. CLIZER:

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

2.2

23

24

- Q. You were asked a question regarding page 4 of your testimony, lines 5 through I think 7 roughly. Specifically you were asked about whether the access to actual hourly customer load data by rate code and then accurate customer counts by rate code that was just occurred. Do you recall that discussion?
 - A. I do.
- Q. Would you agree with me that a company that had AMI deployment should be able to achieve actual hourly customer load data by rate code?
- A. I would expect that to be the case, yeah. That is -- One of the benefits that have been touted for AMI is the ability to have this hourly information. I do know that, you know, Evergy has obviously had their AMI meters in place longer than the other utilities or at least the electric utilities within the state. I know that they've talked about some of the capabilities that could happen with the AMI for quite some time within the rate cases that I've been a part of.

Page 460

1	Q. And I apologize. Just for the sake of the
2	record, I know it was addressed earlier, AMI we are both
3	discussing, advanced metering infrastructure, correct?
4	A. Correct.
5	Q. Again just to reiterate one more time. The
6	accurate customer counts by rate code, that is also
7	information that you would agree with me a company that
8	has made substantial AMI investments should be capable of
9	generating with relative ease?
LO	A. I would certainly hope so. I would think that
L1	that's information that the Company would want to keep as
L2	well.
L3	Q. Again just for the sake of the record, I think
L4	you might have mentioned this earlier, you would agree
L5	with me that Evergy has substantially completed its AMI
L6	deployment for residential customers?
L7	A. I believe so.
L8	MR. CLIZER: No further questions. Thank you.
L9	JUDGE HATCHER: And the Company.
20	MR. FISCHER: No thank you.
21	JUDGE HATCHER: And redirect.
22	MS. KERR: Yes, I just have a few questions.
23	Thank you.
24	REDIRECT EXAMINATION
25	BY MS. KERR:

- Q. Mr. Fischer asked if it's Staff's role to evaluate tariff rate design. Do some of our departments cover some other tariffs?
- A. Is the question are there other departments that cover other tariffs, yes, there are.
 - Q. So you're not doing all the tariffs?
 - A. No, we're not.

- Q. Okay. And you were also asked about doing analysis. Is it your experience that different utilities have different views on what constitutes analysis?
 - A. Absolutely.
 - Q. Could you expand on that?
- A. Yeah. So one of the issues when we're talking about some of the data requests, one of the issues that we've run into at least in recent history and maybe this has been the case that I'm not aware of in the past but in recent history what we've had are these objections to data requests from the Company saying that would require us to do additional analysis. I touch on this a little bit in my testimony, but to the extent that it would require somebody at Evergy to do something to get information isn't exactly the same as creation of data, right. So when Evergy is talking about the fact that information is available but they just can't give it to us or they won't give us the information because they say

Page 462

- it's not in a useful format, that can be problematic. Especially when we're talking about some of the hourly information that we expect to be available and when we hear from other utilities that this information is going to be available or they're not really sure why we wouldn't think it would be, that becomes problematic. So I talk about within my testimony the potential for -- or I guess a risk of utility kind of setting up barriers that withhold information, that's something that we obviously don't want to have as an issue going forward.
- Q. And you had those issues with Evergy in this case. Did you run into some of those issues with this case?
- A. I think in this case the issue that we had with the DR responses most of the time was referencing back to their direct testimony that included very little, if any, information, especially around the costing. We've had the issue that I've described in past cases though.
- Q. And you were discussing data availability versus deliverability and whether that was requiring a utility to, quote, produce information that doesn't exist. Is asking for delivery of information asking for information that doesn't exist?
 - A. I don't believe so, no.
 - Q. So what would --

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- Specifically -- So within the context of a rate Α. case -- Well, we've been told that Evergy is doing some, I don't want to use the wrong phrase, but I want to say data cleanup for filing its direct case. And then when we've asked for essentially the same information for the update period, we've had pushback stating that that would require additional analysis that they weren't willing to Now, the result has been that the Company in some instances has done that analysis for themselves but only to the extent that they wanted to respond to Staff. so they do the analysis -- They refuse to give us the information that we request but they'll do an analysis very similar to what we've asked for or very similar to what they've done for their test year in order to respond to our direct or our rebuttal testimony. That's a barrier that really shouldn't be in place.
- Q. Okay. In the context of an update period, is a month a long time and how so, if it is?
- A. A month can be a long time. Especially depending on the timing. So when you're looking at some of the differences within rate structures, there are differences in the rates that occur within a season. And to the extent that that month pushes into a season, that can make a difference. What we're looking at for this next rate case, a month means another month of

information with customers that have been served under the new higher differential time of use rates.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

From what I understand from the data request responses and some of the testimony in the hearing room over the last couple of days, Evergy's upcoming rate case, their test year is unlikely to have any information regarding customers being served on this higher differential. To the extent that we don't get information within our update period for that transition, that starts to become -- basically that entire issue becomes a true-up issue. That's problematic because the timing becomes much shorter and just the level of the amount of time that we have to review and develop positions and provide the Commission with recommendations in that case makes it much more difficult. So the short answer I think is yes, a month can make a lot of Two months can make even more difference difference. when we're talking about a transition time period like we're in right now with a company that's expecting to file a rate case any day.

- Q. And you were asked whether Staff made a cost recommendation in regards to the data requested. Does Staff have the information regarding Evergy's systems to even begin a cost study?
 - A. We don't. The purpose of -- Well, one of the

- 1 reasons that we are here today is that we were asking for 2 -- we signed a Stipulation and Agreement with the 3 Company. We're trying to get an idea of what some of 4 these cost estimates were. What we thought we'd get in 5 direct testimony from the Company were breakouts of 6 here's what it will cost for component X, Y and Z, 7 component A, B and C are far too costly, and the accounts 8 haven't changed that much so maybe it doesn't make sense 9 to do a deep dive analysis on that. What we got is the 10 entirety of stipulation provision 1, a very high level 11 estimate of what it would cost to redo their entire 12 system according to them and the Company basically saying 13 that's what Staff wanted in the first place. That's not 14 the case. 15 Ο. Now, under Section 393.140(1), the Commission 16 has the power to require utilities to, quote, prescribe 17 the form of every schedule and from time to time 18 prescribe or order such changes in the form --19 I'm sorry. In the form THE COURT REPORTER: 20 what? 21 Let me try to paraphrase that. MS. KERR: 22 BY MS. KERR: 23 It might just be easier if I provide the Ο.
 - Q. It might just be easier if I provide the statute to the witness and just ask my question. If I can approach. Looking at that statute, why would Staff

- **Evidentiary Hearing** Page 466 1 recommend a different rate design than the Company and 2 how I guess -- how does more than one independent study 3 or recommendation benefit the ultimate decision in this 4 case? 5 Before the answer, pardon, I MR. CLIZER: 6 missed it. Which statute is this? 7 JUDGE HATCHER: 393.140.11. 8 MR. CLIZER: Please continue. Sorry for the 9 interruption. 10 THE WITNESS: Do you mind if I read this really 11 quick? 12 Sure. Go ahead. MS. KERR: 13 Okay. And your question was --THE WITNESS: 14 BY MS. KERR: 15 0. Why would Staff recommend a different rate 16 design than the Company. How does more than one
 - independent study or recommendation benefit the ultimate decision in this case?

18

19

20

21

22

23

24

25

Sure. So I mean, I think an important function Α. of Staff is providing the Commission with an independent Right. And so to the extent that rates are -if a -- If a rate design by the Company isn't based on cost causation, it's probably a good idea to have an independent option to look at that might provide that as an option for the Commission to order.

2	Thank you.
3	JUDGE HATCHER: Thank you. That ends redirect.
4	That ends our witnesses. Mr. Luebbert, you are excused
5	and you are not subject to recall. Thank you.
6	THE WITNESS: Thank you. It's one benefit of
7	going last.
8	JUDGE HATCHER: Commissioners, for your
9	information we're going to, me and the counsel are going
LO	to stay on the record and finish up some details here.
L1	It will take about five or ten minutes. The substantive
L2	part of the hearing is over. Chairman Rupp.
L3	CHAIRMAN RUPP: Thank you, Judge. Appreciate
L4	everybody's time. What I'm going to say now is the
L5	opinion of Scott Rupp, individual Commissioner, not
L6	representing the Commission or any other Commissioners.
L7	But from my standpoint, the entirety of the last two days
L8	has been poor communication. This is now the second
L9	hearing that we've had in the last couple months or month
20	or two that the result of why we are here is because of
21	poor communication.
22	I think of the manhours, the time, the effort,
23	the money spent on these hearings. You all, I'm talking
24	to the Company and the Staff, you have better information
25	and better data than the Commissioners do. We will make

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1	this decision, but it's like asking Congress to figure
2	out a local zoning issue. We don't have as much
3	closeness to it as you guys. We will have to make this
4	decision on what happens unless the parties can get
5	together and come up with some type of a path forward,
6	some type of settlement or something, because you can
7	always roll the dice and just see how it's going to turn
8	out and what we're going to come down on.

I highly encourage you since you have better information than we do to try to figure out a path Again, that's just my personal comments. Thank forward. you, Judge. Appreciate it.

Thank you, Chairman. JUDGE HATCHER: Okav. First, Ms. Lange, my apologies to Let's get started. I came down on you a little too hard. During your testimony I thought that I had, speaking of miscommunications, I thought your testimony had changed and differed and I obviously misheard. My apologies.

Let's get to exhibits. I'm going to first read off, we have four pending exhibits that are -- we have four pending exhibits. I'm going to talk about the first These are going to be the late-filed exhibits unless I get no objections here. I'm not pushing for no I'm just letting you know that these two objections. would fall under that category. First is Exhibit 219,

Evidentiary Hearing

1 which is in my hand. This is the Commission requested 2 Attachment A to the motion to compel. Are there any 3 objections to the admission of Exhibit 219 which the 4 Commission requested, it is Staff's number, of Attachment 5 A? 6 MR. FISCHER: No objection, Judge. No objection. 7 Excellent. JUDGE HATCHER: So 8 admitted. 9 (STAFF'S EXHIBIT 219 WAS RECEIVED INTO EVIDENCE 10 AND MADE A PART OF THIS RECORD.) 11 JUDGE HATCHER: Exhibit 6 is the Company's 12 errata sheet filed last night well before their deadline of eight o'clock this morning for Mr. Lutz's testimony. 13 14 First, has counsel had an opportunity to be on EFIS to 15 look at purported Exhibit 6? 16 MR. CLIZER: Yes. 17 Any objections? JUDGE HATCHER: 18 I defer to Staff. MR. CLIZER: Start. GO 19 ahead. 20 MS. KERR: Well, Staff still believes this is 21 improper surrebuttal but, you know, I think it's better 22 to have the information than not have the information. 23 So we'll withdraw our objection but, you know, still want 24 to say that it is improper surrebuttal. I guess I still 25 want to have that on the record.

1	JUDGE HATCHER: I believe your message has been
2	heard.
3	MR. CLIZER: I am torn because I would also
4	like to maintain the objection because I think it's
5	improper, but for the same reasons I'm willing to concede
6	on the point but I would echo Staff's comments.
7	JUDGE HATCHER: I applaud you for both taking
8	the higher road. Exhibit admitted.
9	(COMPANY'S EXHIBIT 6 WAS RECEIVED INTO EVIDENCE
10	AND MADE A PART OF THIS RECORD.)
11	JUDGE HATCHER: Gosh darn it. I keep
12	misplacing my stickies. Okay. Exhibit 206, which is Ms.
13	Lange's direct testimony from previous Rate Case 0129 and
14	0130. We were holding that exhibit because what was
15	offered by Staff was the entirety of Ms. Lange's direct
16	testimony. I believe the question, I don't know if it
17	was an objection, but I believe the question that caused
18	us to just put a pause on this was do we want all of the
19	pages included in this exhibit, or only the 61 to 64, or
20	only the I think it was a class cost of study section
21	that preceded part of that.
22	I'm going to start with Mr. Fischer first. Do
23	you have any updated comments on Exhibit 206?
24	MR. FISCHER: I don't have any real updated

I would still suggest that we have an excerpt

25

comments.

that relates directly to this case, the cost of service study.

JUDGE HATCHER: I do like a good excerpt.

4 Mr. Clizer.

MR. CLIZER: I hate to be the problem child, but my preference would be to have the complete document under the rule of completeness. My rationale for that is simply that I don't want any party to cite to something out of context, and I just don't see what the prejudicial value of having the whole document is from an evidentiary standpoint or from a cost standpoint for the Commission for that matter. I don't have a strong opinion on this, but it's easier when you have the full context to make sure nothing can be misread. That's my personal opinion.

JUDGE HATCHER: I can share my concern. My concern was we're only talking about page 61 to 64. That was the request. But then we had testimony saying this class cost of service discussion played into that. I'm now a little bit more inclined to let the whole shebang in.

MS. SCURLOCK: Your Honor, we actually did refer to more than just that. That particular portion is what is the highlight of this case. I will say that I believe that there is more in the testimony in regards to this case and I will echo Mr. Clizer that for the sake of

eliminating context in some way I think it's beneficial

1

2 to have the entirety of the testimony in the record. 3 JUDGE HATCHER: My other concern is that 4 there's going to be a citation to a portion of Ms. 5 Lange's testimony from a prior rate case that we never 6 discussed in this room. 7 MR. CLIZER: Might I offer a solution? 8 MS. SCURLOCK: I think if somehow something is 9 cited in a brief that someone has an opposition to, they 10 could certainly file a motion to strike. I mean, I'm not 11 trying to delay the case, but I mean, I can tell you that 12 we don't intend to cite to elements. 13 JUDGE HATCHER: Thank you. Anything else? 14 If Evergy had an objection, it is overruled. Excellent. 15 Exhibit 206 is admitted onto the record. 16 MS. KERR: In its entirety? 17 In its entirety, yes. JUDGE HATCHER: 18 (STAFF'S EXHIBIT 206 WAS RECEIVED INTO EVIDENCE 19 AND MADE A PART OF THIS RECORD.) 20 JUDGE HATCHER: Exhibits 3 and 4 I believe were 21 Mr. Lutz's, yes. We were holding those until 9:05 this 22 morning to allow everyone to look at Exhibit 6 which is 23 the correction. Are there any objections to the 24 admission of 3 and 4, Mr. Lutz's direct and surrebuttal? 25 I didn't catch that. MR. FISCHER:

1	MR. CLIZER: Staff is trying to say it wants to
2	maintain its existing motion to strike for the purpose of
3	the record I think is what the point is even though it
4	was overruled.
5	JUDGE HATCHER: Motion to strike of his
6	specific.
7	MR. CLIZER: Yes. You had previously ruled on
8	it, but they're maintaining it for the sake of the record
9	I think is what they're doing.
LO	JUDGE HATCHER: Do you want to make your
L1	motion?
L2	MS. KERR: I would suggest taking up the motion
L3	to strike with the case but otherwise. With that
L4	objection or with that motion, I would.
L5	JUDGE HATCHER: This was your motion to strike
L6	all of Riley's testimony and instances of Mr. Lutz?
L7	MS. KERR: Yes.
L8	MR. FISCHER: Judge, it was my understanding
L9	you had ruled on that.
20	JUDGE HATCHER: Are you preserving it for?
21	MR. CLIZER: For the love of God. I'll renew
22	Staff's motion to strike at the OPC because I want it on
23	the record in the very small chance that I feel I need to
24	bring an appeal. For the sake of the record, I renew the
25	motion to strike.

1	JUDGE HATCHER: Okay. I want to make sure that
2	OPC, you are
3	MR. CLIZER: Whatever the original filed motion
4	to strike, the OPC joins it.
5	MR. FISCHER: On behalf of the Company again, I
6	will object to that and suggest that it should not be
7	approved.
8	JUDGE HATCHER: Thank you. Are you going to
9	get what you need if I rule on that now?
10	MR. FISCHER: Yes.
11	JUDGE HATCHER: I'm going to stay consistent
12	with the ruling given at the beginning of the case. Mr.
13	Lutz's couple sentences are the objection is the
14	motion to strike those couple sentences is denied as they
15	asked a question and the Commissioners can interpret that
16	as they will even though one of those questions was
17	seeking advice. On Mr. Riley's testimony that the
18	objection was that it was not part of the underlying case
19	in chief of the Company and my ruling found that I was
20	not persuaded by Staff's argument and it was the
21	motion to strike was denied.
22	MS. KERR: I'd like to preserve that as well.
23	Never mind.
24	JUDGE HATCHER: Okay. Exhibits 3 and 4 are

admitted onto the hearing record.

1 (COMPANY'S EXHIBITS 3 AND 4 WERE RECEIVED INTO 2 EVIDENCE AND MADE A PART OF THIS RECORD.) JUDGE HATCHER: Okay. One whole stickie is 3 4 I'm going to go through now the parties' exhibit done. 5 I just am double checking to make sure that all 6 of your exhibits have been appropriately entered or ruled 7 Let's start with the Company. I have Exhibits 1 8 1 through 5 were presubmitted. 6 is the Lutz 9 errata sheet. 7 is the rate modernization presentation. 10 All of those have been admitted. I'm looking to see if 11 anyone disagrees. I hear none. 12 I'm going to go with OPC, because their list is 13 300 for Dr. Marke, 301 for DR 1, 302 for DR 2, shorter. 14 303 for DR 3, 304C for DR 2000. Note under the 15 Commission rules we will have a blank public and Exhibit 16 305 the Commission response that was filed in 17 Mr. Clizer. EW-2017-0245. Yes. 18 MR. CLIZER: Really quick. You had previously 19 indicated that you did want the OPC to update 300 to 20 remove the confidential designators. You had mentioned 21 at the time that an email was sufficient. I am prepared 22 to late file. Judging by your gesture, I indicate that I 23 am still supposed to email it to you. Is that accurate?

I am satisfied simply receiving an email from

JUDGE HATCHER:

I'm going to look to the other

24

- 1 Mr. Clizer with the confidential designations removed
- 2 | from Dr. Marke's testimony. Would any other party like
- 3 to look at that, because it is going to be a substitute.
- 4 MR. FISCHER: I would appreciate receiving a
- 5 copy. I don't need to see it ahead of time if that's all
- 6 | they do.
- 7 MS. KERR: That's fine.
- 8 MR. CLIZER: I will email it to all parties as 9 a matter of course. Thank you.
- 10 JUDGE HATCHER: Excellent. Thank you. Staff
- 11 | exhibit list. I'm just going to go through one at a
- 12 | time. 200 is a rebuttal of Cox. 201 is the public,
- 13 | there's no confidential version. And 201 is the public
- 14 | version of Lange rebuttal. I'm going to stop here. Ms.
- 15 | Kerr, can you follow the same example for emailing the
- 16 | non-confidential, you know, watermark stuff removed?
- 17 Thank you. 202, Luebbert rebuttal. 203, Stahlman
- 18 rebuttal. Here are the ones introduced during the
- 19 hearing: 204 is a stipulation -- oh, that's the
- 20 stipulation and requested data. I don't know shorthand.
- 21 | 205 is DR 0250.1. 206 is the full Lange direct from File
- 22 No. 0129 and 0130. 207 is DR 0176. 208 is DR 177. 209
- 23 | is DR 197. 210 is DR 213. 211 is the rebuttal also
- 24 marked as Exhibit 50. 212 are tariff sheets. 213 is the
- order approving Stipulation and Agreement from EO-94-199.

1 Exhibit 214 is rate codes. Exhibit 215 is the Report and Order from Ameren's prior rate case ending in 0337. 2 3 Exhibit 216 is DR 206. Exhibit 217 is DR 207. 4 218 is mis-numbered due to the Judge miss counting. 5 Exhibit 219 is Attachment A to the motion to compel. 6 Those are all the exhibits I have. I've heard 7 no input on exhibits. Mr. Clizer. 8 MR. CLIZER: Just a note. Exhibit 211 is 9 designated confidential as well for the sake of the 10 record. 11 MR. FISCHER: Is that the Lutz testimony? 12 JUDGE HATCHER: Yes. As I recall, it was 13 marked Exhibit 50 and it was from a prior case but I 14 don't remember the number off the top of my head. 15 it's Lutz's testimony. 16 MS. KERR: From the ER-129 case. 17 It's 129, 130. MR. CLIZER: 18 JUDGE HATCHER: Okay. Late filed, we don't have any late-filed exhibits. 19 20 I order Public Counsel and Staff counsel to 21 email, as earlier described, one week, today is the 31st, 2.2 by next Wednesday will be the due date. February 7. Τ 23 will put this all in writing in the next day or two. 24 February 7 for the mailing of the nonconfidential

previously filed exhibits.

1 Let's talk about briefs. Initial briefs Okay. 2 already ordered February 29. 3 MR. CLIZER: Your Honor, can I have just one

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

moment to confer with counsel for just a second regarding the briefing schedule? If what I'm about to propose would work, it would be for the benefit of the Commission.

JUDGE HATCHER: I'm going to pause you for just a second, because I also want to make an announcement about settlement. So the briefing schedule is February 29 and March 15. As the Chairman indicated, settlement can still be achieved by the parties. All kinds of different motions could be filed by the parties, and I am aware, because I was the Judge in at least one prior case which after hearing did settle.

Mr. Clizer, go ahead. You wanted to be -- You wanted to have a conversation. Let's go off the record for just two minutes.

(Off the record.)

JUDGE HATCHER: Let's go back on the record. Thank you. We are back on the record. Counsel was just discussing possibly changing some scheduling. My understanding is we are not going to change the scheduling at this time. But we will keep an eye for any filings to that effect in the future. Excellent. Ι

Page 479

Τ	don't nave anything else. Does anybody else have
2	anything they want to bring up? It's just a few minutes
3	before 5:00. Commissioner Kolkmeyer. Thank you.
4	Commissioner Kolkmeyer, you wanted to say some comments.
5	Please go ahead.
6	COMMISSIONER KOLKMEYER: Yes, thank you, Judge.
7	I just want to echo the Chairman's comments here a little
8	bit ago about communication. I think he was spot on. So
9	I suggest all parties listen to what he had to say. So
LO	thank you, Mr. Chairman, for your comments.
L1	JUDGE HATCHER: Thank you, Commissioner. Your
L2	words have been heard by the parties. I appreciate that.
L3	Any other announcements before we adjourn? Excellent.
L4	We are adjourned. Thank you. We're off the record.
L5	COMMISSIONER KOLKMEYER: Thank you, Judge.
L6	JUDGE HATCHER: Thank you, Commissioner.
L7	(Whereupon, the hearing adjourned at 4:59 p.m.)
L8	
L9	
20	
21	
22	
23	
24	
25	

	Evidentiary Hearing	January 31, 2024
1	INDEX	Page 480
2	STAFF'S WITNESSES:	Page
3	SARAH LANGE	
4	Direct Examination by Ms. Kerr Cross-Examination by Mr. Clizer	243 247
5	Cross-Examination by Mr. Fischer Questions by Chairman Rupp	282 325
6	Questions by Commissioner Hahn Questions by Chairman Hatcher	338 364
7	Recross-Examination by Mr. Clizer Recross-Examination by Mr. Fischer	375 379
8	Redirect Examination by Ms. Kerr	387
9	MICHAEL STAHLMAN Direct Examination by Ms. Kerr	399
10	Cross-Examination by Mr. Fischer	401 407
	Questions by Chairman Hatcher Recross-Examination by Mr. Clizer	410
11	KIM COX	
12	Direct Examination by Ms. Kerr Cross-Examination by Mr. Clizer	411 413
13	Cross-Examination by Mr. Fischer Questions by Judge Hatcher	415 424
14	Redirect Examination by Ms. Kerr	425
15	J LUEBBERT Direct Examination by Ms. Kerr	427
16	Cross-Examination by Mr. Fischer Questions by Judge Hatcher	429 454
17	Recross-Examination by Mr. Clizer Redirect Examination by Ms. Kerr	459 460
18	Redirect Examination by Ms. Reif	400
19		
20		
21		
22		
23		
24		
25		

	Evidentiary Hearing	January 31, 2024
1	EXHIBIT INDEX	Page 481
2	COMPANY'S EXHIBITS:	RECEIVED
3	1 Dragoo Direct 2 Dragoo Surrebuttal	58 58
4	3 Lutz Direct 4 Lutz Surrebuttal	475 475
5	5 Riley Direct 6 Lutz errata filing	53 470
6 7	7 Rate modernization slides	287
	STAFF'S EXHIBITS:	
8	200 Cox Rebuttal 201 Lange Rebuttal (public only)	413 246
9	202 Luebbert Rebuttal	428
	203 Stahlman Rebuttal	400
10	204 Paragraph 4(a) and list of requested data 205 DR 0250.1	66
11	206 Lange Direct from ER-2022-0129 and 0130	472
12	207 DR 0176 208 DR 0177	107 107
14	209 DR 0177	118
13	210 DR 0213	118
	211 Lutz Rebuttal from ER-2022-0129 and 0130	124
14	211C Lutz Rebuttal from ER-2022-0129 and 0130	124
	212 Tariff sheets	146
15	213 Order from EO-94-199	184
	214 Rate codes	146
16	215 Report and Order from ER-2022-0337	159
	216 DR 0206	170
17	217 DR 0207	170
1.0	218 (no exhibit due to mis-numbering)	
18	219 Attachment A list of data requests	469
19	OFFICE OF THE PUBLIC COUNSEL'S EXHIBITS:	
20	300 Marke Surrebuttal (public only) 301 DR 1	218 97
21	302 DR 2	97
2.2	303 DR 3	97
22	304 DR 2000 304C DR 2000	274 274
23	305 Order from EW-2017-0245	324
24	(All exhibits were retained by the Mi Public Service Commission.)	ssouri
25	Table Belvie Commission.	

1	CERTIFICATE OF REPORTER
2	STATE OF MISSOURI)
3	COUNTY OF COLE)
4	I, Beverly Jean Bentch, RPR, CCR No. 640, do
5	hereby certify that I was authorized to and did
6	stenographically report the foregoing Public Service
7	Commission Evidentiary Hearing and that the transcript,
8	pages 240 through 481, is a true record of my
9	stenographic notes.
10	I FURTHER CERTIFY that I am not a relative,
11	employee, attorney, or counsel of any of the parties,
12	nor am I a relative or counsel connected with the action,
13	nor am I financially interested in the action.
14	Dated this 13th day of February, 2024.
15 16	Beverly Jean Bertch
17	Beverly Jean Bentch, RPR, CCR No. 640
18	
19	
20	
21	
22	
23	
24	
25	

\$				
\$100 296:7,14 298:6 437:12,15				
\$100,000 358:8				
\$120,000 354:14				
\$42,000 267:11				
\$5,000 317:13				
\$50 403:1,3				
(
(1) 319:17				
(2) 319:21				
0				
0129 470:13 476:22				
0130 254:23 470:14 476:22				
0176 476:22				
0250.1 476:21				
0337 477:2				
1				
1 247:11,23 248:3, 20 251:3 253:8 254:1 263:11,13, 21 265:15,22 271:5,8,11 277:14 282:22,23 283:24				

284:1 298:13,22 313:21 314:8

315:8,14 316:18, 19,25 317:2,25 318:3 329:21 330:5 332:24 340:5,6,11,17 342:19 346:20

Evidentiar
347:2 358:5,7 359:24 372:3 377:4 385:22 386:5,7,15,19 437:13 465:10 475:7,8,13
10 308:2 341:2 360:4,14 403:8 406:2
100 252:3 333:17 374:8,9
11 360:4
110 317:9,16 360:1
11:30-ish 337:3
11:40 344:18
11:40-ish 337:23
12 303:12 307:11 308:21 318:3 328:6,12 353:9 360:14 361:25
12-month 353:18
120 307:11
129 309:18 477:17
129/130 255:2
130 477:17
132 307:17 363:15,20,21 365:12,19,22 392:11,13,14,17
14 323:15 419:8
140 418:24 419:22 420:21
15 243:23 261:21 262:14 263:1 318:25 341:2 343:2 369:4 370:1,2,3 394:15 399:23 411:21 419:1 427:24

15-minute 333:21			
369:1,10,17	2 256:4,10,13,14,		
370:4,8,9,15	2 256:4,10,13,14, 22 257:1,3,21		
393:15	258:21 261:14		
16 301:20 302:2	271:13,20 273:6,		
324:20 359:5	15 277:14 278:8		
458:11	292:5 295:9 309:5		
17 297:15 301:19	319:19 334:5		
302:1 365:7	338:21 339:3		
177 476:22	347:3 358:11 374:7 377:11		
177,000 272:3	397:2 414:10,13,		
18 253:25 266:21	19 415:10,12,15		
284:16 302:15	419:24 420:14		
309:5 324:5 328:5	421:7 475:13		
457:13,17 458:10	2-1/2 257:11		
180 290:20,23	20 294:14 332:21,		
291:2 321:25	22 406:2 434:7		
322:4	20,000 271:25		
185 307:18	200 307:14,19		
187 363:17	363:19 365:20		
190 291:2,6 322:5,	392:7 396:9		
20	411:22 413:1,5,6		
197 476:23	429:18 476:12		
1978 280:18,25	2000 272:19 475:14		
,			
1990 366:2 379:23	2000s 366:20		
1990s 264:5 366:2	2005 249:5		
1994 380:2	2006 282:11		
1996 264:25	201 244:1,2,4		
265:6,22 397:24	245:7 246:4,8		
422:19	476:12,13		
1:00 337:13 344:19,20	2010s 330:11		
1:30 337:11	2011-ish 249:6		
1.30 337.11 1a 295:22	2012 334:19,20,21		
1s 308:11	2014 334:24		
13 300.11	2017 336:23		
	2018 324:5		

January 31, 2024Index: 2019..69

	Evidentia	ry Hearing Janua	ary 31, 2024Index: 201969
2019 280:1	421:23 422:1,8	264:16 319:20	415:15 418:7
201C 244:4	423:14,16 476:23,	328:17 364:11	432:4 434:6
202 427:25	24	369:4 403:20	454:18 455:8
428:12,16,17	214 477:1	404:5,8 405:2	459:7 472:20,24 474:24 475:1
476:17	215 477:1	30-minute 370:10	
2022 253:1,5,10	216 477:3	393:15	40 304:25 313:9
313:13 315:12,15		30-year 403:14	315:9 354:7
319:19,20 359:23	217 477:3	300 475:13,19	40,000 272:1
362:13	218 243:24 477:4	301 475:13	42,000 271:25
2022-0037 355:15	218C 243:24	302 475:13	4a 295:22 377:11
2023 243:23	219 325:3,7	303 475:14	
285:3,23 372:18,	359:10 468:25		5
23 399:23 411:21	469:3,9 477:5	304 272:12 274:10	F 044 40 44
427:24	22 253:1 275:12	304C 274:13,14	5 244:12,14 253:25 256:4,10
2024 267:21	346:12,13 347:10	475:14	257:4,9,11,21
352:14,17,19	389:15	305 277:3 323:24	258:6,7,16,21
2025 352:20	23 347:10	324:6,9,13,14	271:22 338:22
2026 352:20	240/120 257:5	475:16	339:3 347:3
203 399:24	303:11	31st 477:21	358:11 369:25
400:12,15,17	26 244:12,15	32 284:14	370:3,5 377:12 397:2 401:8
476:17	260 267:10	337 341:9	404:9,16 419:1
2030s 336:19	27 380:19	34 257:8	459:8 475:8
204 389:21 476:19	28 285:3,23 286:4	345 384:5	50 268:18 327:3,7, 11 476:24 477:13
205 476:21	289:20 290:18 430:8	36 261:1 408:15,	50,000 304:25
206 470:12,23 472:15,18 476:21	29 478:2,11	16	54,000 271:22
477:3		36-month 261:6	
207 476:22 477:3	2a 295:22 377:11	365 418:16	5a 295:22
208 476:22	3	393.140(1) 465:15	6
209 476:22	3 056,440,46,00	393.140.11 466:7	6 050.0 44 04
21 275:13	3 256:4,10,16,22 257:1,3 258:21	3:15 421:14,18	6 253:8,11,24 259:3 260:9
	271:13,20 295:16	3a 295:22 377:11	408:16 459:1
21,000 271:20 358:15	377:11 401:5		469:11,15 470:9
210 476:23	403:7 414:10,13, 19 415:15 419:24	4	472:22 475:8
211 476:23 477:8	420:14 421:7	4 256:4,10,25	60 275:9
	472:20,24 474:24	257:4,6 258:21	61 470:19 471:16
212 476:24	475:1,14	271:22 277:15,23	64 470:19 471:16
213 363:8,14 397:19,24 398:5	30 253:5 261:23 262:15,17,24	303:12 377:11 414:11,13,21	69 418:24 419:22 420:21

6:00 408:14,15,16 **6a** 295:22 7 **7** 260:17,20,21,22 261:7,9 285:12,13 287:9,12,14,17 295:5 313:10 316:21 317:3,18 377:18 404:9,15, 16 459:8 475:8,9 477:22,24 **78** 336:10 **7:59** 394:14,16 8 **8** 260:17,20,21,22 261:7,9 317:3,18 334:5 393:8 **8,760** 333:15 375:10 **80** 296:7,14 317:9, 16 437:12,15 **8a** 261:11 377:18 **8b** 261:11,14 262:17 368:24 393:8 **8c** 260:23 263:10, 11,13,15,19,25 **8c1** 266:8 377:4 **8c2** 266:10 271:25 **8c3** 267:5 271:25 377:18 413:22 **8c4** 268:11 272:1 377:18 413:22 **8d** 268:25 377:18

9 **9** 269:6,7 286:3 289:14 372:21,23 373:7 393:8 417:12 430:3,6 **90s** 263:19 264:21 330:14 343:20 366:5,22 380:12 398:12 **96** 264:11 9:00 242:1 **9:05** 472:21 Α **A-R-C** 280:10 **a.m.** 242:1 408:14, 16 abandoned 386:4, abandoning 385:21 ability 402:8 422:16 436:2 445:19 455:24 459:19 abruptly 335:8 **absence** 303:15 367:23 absent 270:9 absolutely 251:15 268:24 295:20 298:25 382:20 429:13 461:11 abstract 300:11, 25

accept 247:12

272:5 288:16

407:10 412:12

acceptable 344:13 accurately 284:20 285:20 287:24 accepts 278:1,9 302:6 325:18 310:19 330:19 access 260:25 achievable 357:22 261:1 307:8 389:2 436:2 454:22,23, **achieve** 281:14 24 455:12 459:9 402:2 459:15 accommodate achieved 358:2 337:4 478:12 account 308:12 acknowledging 443:21 314:21,25 315:1, 2,4 317:24 318:3 acquisition 326:4,5,10,16,20 312:15 360:14,17 361:23 acronym 279:3 362:1 374:10,12, 18 391:25 392:6 acronyms 370:19 405:6 act 253:7 280:18 accounting activity 323:16 299:24 300:1 417:14 332:19 392:17 actual 289:10 accounts 282:9 316:24 337:10 283:6,12,16,20 340:20 353:7 308:9,12,13,18,21 372:11,12 399:25 318:4 327:14 403:5 405:7 328:7,13 360:15 406:17 454:22 361:25 371:12,14 459:10,15 372:11,13 414:20 417:5 425:25 actuals 418:12 465:7 add 257:4,7,8,19 accurate 245:2 271:22 272:1 247:13 248:21 280:9 439:16 251:14 252:22 add-on 289:17 253:2 258:17 291:13 263:13 264:6 added 257:10 265:8 267:8 357:11 384:16 270:10 272:4 423:11 275:20 276:17 279:12 355:5 adding 257:3,12 367:3 378:16 258:11 361:12 387:5 408:11 addition 272:5 434:13 454:23 279:8 330:25 457:21 459:11 460:6 475:23 additional 252:23 255:19 259:8

	21.001.00	,	Timaoni additivonalioniativ
309:9 322:17	449:11	411:1 427:2	379:24 380:6,8,18
347:5 367:5 419:4	admission 274:12	afforded 348:7	389:6,8,14,15,17
421:6 424:11,15	287:8,9 324:12		394:20,23 397:24
440:4,13 461:19	325:9 413:4 422:1	afield 324:1	398:11 456:22
463:7	428:15 469:3	afternoon 242:19	465:2 476:25
additive 317:23	472:24	399:7,8 411:5,6	agreements
		413:10,11 427:6,	380:20
address 244:25	admit 294:25	7,8	
262:5 280:24	323:24 324:7	,	ahead 246:16
289:15 360:18	397:18 398:9	agenda 337:9,22	260:11 278:12
384:21 395:4	admitted 242:12	344:23	285:10 315:20
addressed 244:24	246:5,6 274:13	Aggregating	337:6,24 344:19
254:8,11 269:4,14	287:13 295:3	279:4	346:25 354:21
280:21 281:5	324:13 398:5	Aggregator	381:24 384:17
288:10 289:16	400:16 413:5	280:10	419:15 426:19
299:5 322:12	422:8 423:14		431:4 442:7
460:2	428:16 469:8	aggressive 446:24	443:24 466:12
addresses 360:20	470:8 472:15	447:19	469:19 476:5
	474:25 475:10	agree 247:25	478:16
addressing	adopt 304:10	248:1,19 249:3	air 307:1 367:1
276:25 288:21,22	-	264:16 269:25	369:20,22,24,25
291:3 312:5,7	adopted 280:17,	272:18 273:2,10,	370:3 393:14
384:19 415:14	19 336:4	22 276:4 277:6,	Algonquin 394:25
426:21	adopting 293:24	11,21,24 278:7,17	
adequate 354:21	advance 324:23	280:14 283:8,11,	align 251:1 264:9
adhere 247:21		15,25 287:25	387:19 395:12
	advanced 410:13	294:9 296:5	aligning 334:25
adjourn 337:16	460:3	307:19 308:18	allegations 432:9,
adjournment	adverse 368:9	310:3 320:2	11
344:18	advice 474:17	334:13 336:6	
		379:6 398:22	allege 321:23
adjusted 257:17 375:10	advisable 278:13	410:6,10 417:25	alleged 321:6
	advise 414:9	418:2 419:22	alleviate 330:6
adjusting 257:20		434:1 440:15 441:20 443:12	
418:8	advised 417:10	441.20 443.12	allocate 328:10
adjustment	advocate 300:23	460:7,14	361:13
244:14 373:17,19,	450:21 451:5	·	allocated 327:24
20,23 374:3,10,	advocated 330:23	agreed 264:11	allocation 248:20,
11,17 395:8		269:21 298:3	22,24 249:2
402:19 405:5	affects 328:21	308:3 391:1	328:20
406:17,23,25	affidavit 266:2	agreement 264:8,	
408:5 417:22	329:15 343:9	22,24 273:8,12,15	alright 294:24
adjustments	412:3,5,11,13,15	310:17 312:16	alternative
257:9 395:9	affidavited 412:7	313:13 315:13,16	251:11,21,23
406:8,13,14		319:19 339:24	252:8 254:19
407:23 418:13,15	affirm 243:1 399:2	341:17 366:2,7,9	263:12 271:6
407.23 410.13,13		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	

346:23 347:1 amounts 438:8 468:14.18 301:4 304:22 348:12 386:9,11, 305:22 430:1,20 analysis 255:10 apologize 246:16 13,14 393:23 431:3,8 474:7 270:25 309:9,15, 261:12 275:1 420:10,25 425:9 16 310:25 311:16, 280:20 298:18 approving 249:25 alternatively 18 377:16 381:12 323:20 328:23 476:25 326:17 401:13,18 407:23 331:5 346:9 approximately 408:9 415:3 353:13,22 356:2 392:11 alternatives 310:4 424:22 434:12,16, 390:19 432:5 Aluminum 327:3, **April** 324:5 460:1 23,24 435:2,15, 7,11 16,23 436:8,12,14 arbitrary 358:6 apparently 294:19 437:5 440:5,6,13 ambiguity 380:4 377:12 394:22 **ARC** 280:10 445:21,24 447:11 398:11 ambiguous 346:9 455:22 461:9,10, archives 372:6 **appeal** 473:24 **Amended** 318:24 19 463:7,9,11,12 **ARCS** 279:2,3 465:9 321:7 appeared 276:12 area 295:5 343:25 **analyst** 411:18 **Ameren** 250:21,24 appears 250:9 407:7 254:13 268:2,3 260:17 354:5 anger 375:4 areas 288:22 303:23 306:12 applaud 470:7 announcement 309:7,15 415:18 325:16,17 332:5,9 478:9 438:7 333:4,11,22,24 appliance 370:1 340:16,24 341:18, **Annual** 372:3 argue 398:2 applicable 287:19 19,20 355:14,15 301:14 answering 274:1 argument 474:20 367:24 394:20 334:20 365:18 **applied** 265:25 395:19,21 396:3, arguments 421:25 376:16 425:7 374:10,12,18 18 397:7.9 arithmetic 403:13 433:23 408:20,23 409:3 **apply** 268:23 404:1,2 **answers** 244:21 271:16 287:20 **Ameren's** 250:22 arose 258:11 245:3 271:23 405:5,13,23 333:12 355:17 302:12 303:14 424:23 425:1 **arrive** 406:7,12 409:1 477:2 316:7 346:21 applying 405:4 arrived 421:21 **AMI** 256:16,17,19 347:22 348:1 268:4 278:25 384:24 389:6 approach 246:20 art 407:9 333:25 334:22,23 391:18,20 392:5 318:19 331:12 asks 388:6 340:24 341:3,5,6 400:6,9 412:21,23 465:25 407:3 408:7 aspects 342:13 414:13,15 416:16 approaches 250:4 410:7,10,13 428:6,9 assertion 247:12 265:7 459:15,18,20,24 anticipate 260:15 asserts 309:7 460:2,8,15 approaching 261:5 310:21 408:4 **amount** 305:4 assesses 262:13, anticipating 259:9 14 307:24 317:14 appropriately 425:2 328:17 338:8 475:6 assessment **anxious** 320:15 370:17 376:10 446:20 **approve** 301:11 387:15 393:20,22 **anybody's** 303:23 429:11,14 430:15 assign 325:2,4 394:3 418:1 apologies 275:10 approved 276:2 455:25 464:13 assigning 325:3 324:1 337:25 293:14 300:24

375:16 405:14

	Evidentiai	ry Hearing Jan
assist 432:23	attorney 274:22 320:5 431:6	awhile 413:21
Assistance 260:2, 6 279:12,18	attorney-client	В
assume 266:10 268:22 311:10 348:19 378:5 388:17 397:7 402:3 438:11	433:25 attorneys 433:24 audit 355:11 356:19 379:5,7,13 444:6	back 245:11,12 248:17 252:4 254:22 255:13 263:5,11 264:5 273:7 291:19
assumes 402:9		293:5 307:4
assuming 274:7 321:1 331:22 402:12 assumption	aughts 330:12 332:11 August 285:3,23 286:3,4 289:14,20 290:18 319:20	316:16 317:10 321:2 324:16 330:9,14 335:5 338:1 342:23 347:4 362:16,2
405:8,13 421:4 assumptions	372:21,23 373:7 389:15 430:3,6,7	364:21 365:20 367:11 368:23
343:20 387:15	authorized 319:23	371:9 374:1
asymmetric 434:19 436:1	authorship 279:23 automate 354:23	375:3,21 377:5 378:1,23,24 380:12 385:6
437:3 asymmetry 434:7	automated 354:25	380:12 385:6 386:23 395:13 398:12 419:12 421:14,15 422
attach 286:16 attached 246:25 254:10 286:11,21, 24 287:1 291:15 380:6	361:11 371:16 availability 250:5 261:5,16 287:22 458:17 462:19 average 327:10,17	19 442:18 457 18 459:2 462: 478:20,21 background 252:23 340:10
attachment 273:6, 12 295:19 324:20, 21 325:7 337:15 358:24 359:3,9 385:13 469:2,4	avoid 272:15,22 274:3 281:14 322:6 359:15 387:20 454:25	backgrounds 437:23 bad 303:24 368 370:10 371:19
477:5	avoided 361:14	badly 358:15
attempt 314:7 attempted 265:1 attendance	aware 244:19 254:21 259:19 272:10 288:19,21	baggage 342:2 balances 308:4
246:11 attended 254:13	335:2 336:9,14 337:3 372:20 387:10 400:4	balancing 300 barrier 463:16
attention 245:10 254:16 287:11 323:24 394:21	461:16 478:14 Awesome 246:2	barriers 462:8 barring 320:25
419:25 450:19	awful 308:19 402:9	base 374:20,23

based 244:14 В 247:16 250:11 255:23 258:13 45:11,12 262:13 266:1,5 252:4 269:8 271:15 255:13,15 278:16 289:1,2,3 1 264:5,11 304:14,23 312:23 291:19 327:8,17 328:11, 307:4 13,16 329:1 317:10 331:16 334:11 324:16 342:15,16 343:19 4 335:5 345:25 346:11,13 342:23 350:8,11 351:18 362:16,25 353:8 355:2 365:20 366:16 378:15 368:23 387:8 406:17,20, 374:1 21 407:3,6,23 21 377:5 408:25 414:21 23,24 418:21 423:2 385:6 425:4 434:22 395:13 440:2 441:20 419:12 444:9 448:24 ,15 422:12, 466:22 :18 457:13, basic 372:5 432:9 :2 462:15 basically 261:19 ,21 276:1 355:3 359:2 ound 377:25 390:6,12 340:10 392:1 464:10 ounds 465:12 **basis** 261:6 266:4 3:24 368:5 321:12 406:1,22, 371:19 23 58:15 Bass 335:11 **e** 342:21 Bass's 257:17 s 308:14 **BDL-1** 245:22 246:24 295:19 317:6 357:15,25 ng 300:15 360:20 368:24 463:16 377:2 389:21 413:16 462:8 bear 360:5 361:9 320:25 **began** 242:1 base 374:20,23

	Evidoritia	ly ricalling Sandar	y 51, 2024ilidex. begilibus
begin 248:3	303:8 306:11	blanket 440:25	412:2 419:25
464:24	307:9 335:3 352:8	block 281:2	422:4 450:19
beginning 247:17	364:19 367:1 401:21 402:9	402:18	473:24
266:7 277:13,24		blown 250:6	bringing 336:18
278:7 371:10 377:20 457:14	biggest 247:23 248:1	263:20	brings 269:6
474:12		blunt 342:22	broad 300:9
	bill 333:12 354:22	347:25	broaden 436:7
begins 275:13	370:23 377:17 406:24 416:8	blur 323:15	
behalf 330:17	420:9 424:18	board 304:12	broader 300:3 338:18 435:25
474:5	425:8 426:6	312:24 396:4	436:4,5
belabor 454:10	billed 329:11	boils 334:16	broadly 434:19
belief 245:4	406:20		
400:10 408:6,8	billing 257:16	books 340:12,14	broke 376:17,20
409:9 412:24	266:14 333:21	372:1 379:10 391:17 392:4	broken 266:9
428:10	335:14 343:10		316:20
believed 338:8	350:22 351:22	bottom 292:5 295:15	brought 263:6
believes 249:21,	352:13 353:16,24		264:3 265:1 272:7
24 256:8 278:18	368:6,14 393:17, 19 394:7 416:7	bound 280:24	394:21 422:15,17
349:9 469:20	419:14 420:8,18,	bounds 383:13	442:5 455:10 456:8
bench 280:9	22 421:2 424:11,	Bowden 396:24,	
324:17 337:6	16	25 409:2	buckets 376:17,23 377:3
364:5 378:5 407:15,17 409:24	billions 371:11	box 261:19	
410:7 421:12,16,	bills 263:2	boy 367:15	budget 252:7
23 423:19 424:6,7		Brad 242:9 246:25	buffet-style
454:15	binding 281:3 300:19	247:10 252:15	291:14 373:1
beneficial 311:13		261:24 269:7	build 331:23 352:5
312:20 313:6	bins 396:7,8,19	290:7	362:6
472:1	bit 242:17 246:15	break 337:3	Building 356:10
benefit 314:13	258:24 259:4	421:14	built 327:7
362:24 379:14	260:23 278:3 279:19 282:1	breakouts 465:5	bulk 280:4 361:15
386:17 466:3,17 467:6 478:6	283:4 284:10	briefing 274:7	bunch 263:7
	331:24 339:14	478:5,10	364:10 371:21
benefits 312:14	345:24 354:24	briefly 355:8	burden 308:16
379:8 459:18	385:4 397:17	398:15 428:24	
bet 335:16,17	398:16 403:19 436:7 455:7	briefs 478:1	burdensome 357:23
betting 401:25	461:20 471:19		
Bev 442:18	BL1-1 385:13	brightlines 288:20 323:6	buried 347:15
big 251:6 263:16			burning 374:25
264:15 265:18	black 413:18	bring 267:4 337:15 362:7	bus 347:20
268:19 270:3	blank 475:15	377:25 378:23,24	
		0	

	Lvideritiai	y nearing January 31, 2	024Index. Buschcausation
Busch 305:1	331:25	299:14,15 301:16	437:10 438:3
business 242:7	camera 272:23	303:4,14 304:4	439:23 441:1
396:16 397:17		306:17 307:9,13,	442:6 443:2,7,10,
444:18,25 445:3	candid 323:20	21,23 309:18	14,22 444:5
446:3,7	capabilities	310:11,22 313:11,	448:4,15,21,25
,	459:23	18 314:1 315:25	449:9 457:14,16
butcher 353:22		316:2,10 317:4,8,	459:17 461:16
button 454:6	capability 259:21	18 318:8,12,14,	462:12,13,14
	capable 433:23	15,25 319:2,10,11	463:2,4,25 464:6,
buy 397:2	460:8	320:3,4,14 321:1,	15,20 465:14
	capacity 370:18	8,18 322:1	466:4,18 470:13
С		323:10,16 324:5	471:1,23,25
	capital 332:19	325:8,16,17	472:5,11 473:13
C&i 373:9	capturing 370:14	326:1,8 329:6,20	474:12,18 477:2,
C-O-X 411:14		330:3,8 331:16,18	13,16 478:14
	cards 401:25	335:25 336:16	cases 249:2,8
c3 268:14,19,23	409:12	339:8,9,10,22	255:3 259:12
c4 268:14,23	care 271:23 325:4	340:8 341:9,16,24	264:13 265:7,10
·	337:22 398:7	343:5,11 344:12	264:13 265:7,10
caboodle 336:15	405:9	346:1 347:8,11,17	287:3 288:5
calculate 318:2		348:5 352:3,6,9,	289:18 304:9
368:5,14 374:14	careful 266:9	10,11,16,18,19,	306:12 308:8
406:16 425:5	carefully 277:12	20,21 353:8,19	
colouisted 406.6	carried 264:11	354:7,14 355:15,	326:8 330:11
calculated 406:6,	357:13	16 356:21 357:6	332:11 339:6,23
	337.13	358:25 359:19,22	340:20 346:15
calculating 374:20	carries 295:16	360:20 361:6	354:12,21 358:18, 20 408:1,2 426:2
calculation 255:10	case 247:17	362:12 363:6,9	429:15 435:21
272:4	249:11,13 250:3,	367:10,13,16	438:9 439:2,19,22
	5,7,21,25 252:18,	372:17 373:25	
calculations 259:1	20,21 253:5,8,11,	374:14 376:16	440:24 444:10 449:14 455:1,16,
calendar 393:20	23 254:4,24	378:9,15 382:18	1 ' '
404:3	255:16,18 257:19	383:1 385:22	18 457:19 458:21 459:25 462:18
	258:1,10 259:17	388:19,23 389:3	409.20 402.18
call 242:23,24	260:12 261:5,24	390:18,22 395:13	catch 287:11
288:20 293:14	262:4 263:2,5,20,	402:10,25 408:19,	328:24 334:10
328:1 344:19	21 266:20,22	25 409:6,16	392:21 472:25
348:25 382:6	268:4,9,22	411:22 412:3	categories 331:11
389:9,25 415:15	269:15,17 270:8	414:12 416:12,19	356:12,16
called 249:9	272:8,23 273:19,	417:10 418:14,19	,
254:16 294:7	23 275:19 276:8,	420:2,5 422:14	categorized
374:21,22 376:8	12 277:8 278:15	429:19,21 430:21	334:14
calling 330:12	279:10,13 281:13	431:18,22,23,24	category 468:25
357:1 393:23	282:14 284:2	432:10,15,19,21	
440:7	286:18 287:5	433:24 434:8	caught 245:15
	290:1 291:23	435:10,17,20	causation 336:11
calls 290:4 327:24	294:17 296:4	436:5,8,15,17	466:23
			I

caused 453:7 470:17
caveat 245:5 279:5 294:18 367:8 375:2 439:17
caveated 257:23 258:9
caveats 300:21
CCOS 249:7,11,16 250:6 255:8 303:3,24,25 328:19 329:8 368:1,4
CD 333:13
center 403:10,16, 24
cents 408:15,16,
certainty 437:24
Chair 246:12 325:10 338:6 423:20
Chairman 325:11, 14 336:24 365:17 377:20 423:21,24 424:1,5 467:12,13 468:13 478:11
challenge 405:13
challenged 405:25
chance 421:25 473:23
change 244:17,20 267:13 290:24 293:4 299:23,25 300:20 332:22 337:19 355:7 357:9 366:1 385:4 438:24 478:23
changed 267:17

279:3 331:18

465:8 468:17 changing 350:20 363:23 370:11 371:13 389:1 402:15 478:22 characteristics 266:2,6 383:17 characterization 275:25 294:10 characterize 339:24 343:1 characterized 275:24 433:2 **charge** 255:7 264:18,20 269:14 270:20 284:5 288:11 351:18 396:5 **charged** 264:18, 20 267:14 342:14 343:18 344:1 349:21 373:20 408:15,16 426:5 charges 262:6 265:10,12,13,14 269:18 270:2 287:23 288:14 388:16 393:9 charging 396:4 Charles 242:4 344:25 **cheat** 246:18 375:22 407:14 **check** 246:18 342:10 364:17 378:20 398:5 424:8 426:15 **checked** 242:16 301:4 **checking** 348:22 379:11 475:5

checks 250:3 **chief** 474:19 **child** 471:5 **choice** 417:13 **chosen** 356:5 circle 245:11 **circuits** 303:8,11 circumstances 287:21 319:24 citation 472:4 cite 273:1 471:8 472:12 cited 472:9 **City** 380:24 **claims** 273:25 clarification 258:18 362:3 402:23 456:21 clarifies 316:18 **clarify** 248:18 281:12 282:24 317:1 322:9 380:9 450:13 455:6 457:12 clarifying 379:20 **clarity** 256:12 449:6 **class** 249:17,20, 22 250:14 265:7 267:19 268:19,20 276:23 280:22 281:4 304:5,11,14 305:14 306:7,9 326:11 327:5 328:4,25 329:19. 23 333:10 334:18 335:7 340:20 351:21 353:18,20 378:10,14,25 379:8,14 401:14,

18 402:6 406:7.13 407:1,3,4 417:6,8, 9 425:1 435:24 444:9 451:18 470:20 471:18 classes 262:3 268:16 328:11,20 333:20,24 370:6 387:20 396:5 416:2 451:13,15 classification 326:2 328:2 classify 327:23 **clause** 244:16 319:6,13,15 373:17 **clawed** 263:5 clean 271:22 **cleaned** 245:13 cleanup 463:4 **clear** 247:4 255:2 270:6,17 288:15 290:14 296:13,16 298:14,19 303:14 316:2 339:15 340:8 345:20 347:7 386:6 404:24 405:19 422:11 446:10 **cleared** 258:15 clearer 314:7 362:5 382:1 **Climate** 403:10,16 **Clizer** 245:9,14 246:19,20,23 247:9 260:4,8 272:11,14,17 274:5,16,24 275:3,6,16 277:3, 5 278:4,6 280:13 281:18 291:21 292:1 323:23

324:3,25 333:9 357:14,16,20 375:22,23 376:1 379:16 395:4 397:16,22 398:14, 15 400:20,21 410:2,3,5,16 413:9,10,13 415:5 422:3,20,21 425:14,15 428:20, 21 452:23 453:3 459:3,4,6 460:18 466:5,8 469:16,18 470:3 471:4,5,25 472:7 473:1,7,21 474:3 475:17,18 476:1,8 477:7,8, 17 478:3,16 clock 255:13 262:13	CO C
close 254:12 256:23 271:15,19 347:4 373:16 395:15	C
closely 256:14 265:24 371:15	C
closeness 468:3 closer 365:20 417:2 456:3 458:18	CO
co-ops 263:8 394:9	CO
coalign 376:22	3
code 259:14 260:15 267:18 276:22 282:10 283:13,16,23 295:12 314:16 334:18 336:1	CC 22
360:25 361:1,2,7, 8 388:10,12,15	C
00-1100-06	i

397:4 402:7,20

404:20 409:22

416:10 418:7,14,

Evidentia
15,17 420:4,6,9,
15 424:12,14,15
425:7,25 454:23,
24 459:10,11,16
460:6
codes 268:17
329:2 388:2
402:16 410:11
415:22 420:1,16
477:1
coding 357:17
cognizant 289:3
coincidence 368:25
coincident
269:12,14,18
270:20 393:11,24,
25 394:2,11,14
397:5
Coleman 246:15
collaborative
430:19
collection 430:22
collects 408:7
color 247:4 293:4 357:16
combination
316:19 354:19
comfortable
247:20 274:1
342:12 367:9
commend 357:20
comment 247:17,
21 288:17 423:21
comments 268:23
297:11 468:11
470:6,23,25
• •
commercial 262:3
289:15 343:18
Commission

```
249:25 259:5.12
260:12 269:13,21
270:9,11 274:10
276:2,3,14
277:15,25 278:8,
17 279:14 280:16,
24 281:3 292:8,
16,25 293:1,8,13,
18 297:21 298:15,
20 300:5,8,13,24
301:12 302:16
303:19,23 304:4
306:14 307:1
310:19 311:13
318:9,10 319:14,
16 322:21 332:7
336:17 342:22
344:14 350:1
351:2 354:8,10
355:19 357:19
365:10 367:24,25
368:19 369:14
376:4 382:3,10
383:1,7,20 393:4
395:25 399:19
402:25 411:17
423:2 427:20
429:16 432:13,17
436:9,11,13,20
437:16 438:4
439:2,6 440:1,3,
11 441:18 443:4.
12,15 445:9,20
446:15,17,23
447:10,18 448:4,
15,20,23 450:10,
16,18 451:11
452:24 454:12,15,
21 457:24 464:14
465:15 466:20,25
467:16 469:1,4
471:11 475:15,16
478:7
277:7 324:3,10
```

Commission's 362:18 450:19

Commissioner
246:13,14,15
292:9,17 293:13
324:17,18 325:9
337:1,4,5,8,23,25
338:3 344:15
345:3,4,5,7
351:23 363:25
364:3 375:20
376:14 385:5
395:3 407:15,16
421:12,16,22
423:19,20 424:6,7
454:13 458:25
467:15
Commissioners

Commissioners 246:12 300:17 335:1 337:9 364:4 375:18 382:18 409:25 410:1 426:20 442:8 443:13 449:20 452:14 459:1,2 467:8,16,25 474:15

commitments 313:13 315:12,15

commit 340:19

commitment

348:17

committed 313:22 318:2 386:18 389:19,22

committing 339:25

common 252:16 310:3,16 332:23 394:9 440:17 457:11

communicated 338:24

communicating 254:6

communication 253:9 345:11,13, 16,19 347:3,5 348:9 352:25 467:18,21
communications 385:6
companies 267:24,25 307:15 330:24 395:18 440:18,25 450:20 458:22
company 245:19 247:24 250:10 251:18,20 252:6 253:7,8,9 254:8 255:22 256:1,13 258:1,6,14 259:4, 11,18 260:10,17 264:17 267:5,10, 12 269:8,10 281:21 283:11 285:24 286:2 287:14 291:9,11, 12 296:14 298:2,6 303:2 308:3 310:4 318:10 324:22 327:23 328:3,6 329:18 331:22 333:3 334:16 347:17 352:25 357:23 366:8 374:22 379:18 380:25 384:23 385:9,15 386:16 393:4 401:15 402:22 406:21 410:18 413:24 414:3,24 416:7 417:5,14 420:11 434:21 441:10 442:25 444:4,13 445:10 451:20 459:14 460:7,11, 19 461:18 463:8 464:19 465:3,5,12

Evidentia
466:1,16,22 467:24 474:5,19 475:7
company's 254:21 258:9 271:9 353:6 358:2 379:10 419:3 438:17 439:10,14 469:11 470:9 475:1
comparable 382:13
compare 366:25
compared 273:23 422:13
compel 255:11 308:24 310:21 311:10 324:20 325:8 353:4 469:2 477:5
compelled 385:2
compile 352:4 372:2
complaint 253:21 287:1,5 290:11, 12,14 291:16,22 318:14,24 319:1,4 320:6 321:1,7,23 322:13,19 323:12 430:21,24 431:2, 5,18 432:9 433:10,11,14,19, 22
complete 258:21 297:24 302:19 303:19 304:19 408:8 471:6
completed 331:2 333:24 460:15
completely 374:17 414:3,13
completeness

471:7 complex 360:11 454:5	255:14 320:8,10 321:15 382:22 433:14,21 441:24 447:6 451:1
compliance 249:14	conclusions 312:12 423:2
complied 316:4 complies 368:21 comply 313:12	concrete 289:9 294:13 425:11 concurrent 253:12
315:11 319:18 component 416:8 465:6,7	conditions 300:20 conduct 290:20
components 281:1,2 310:18 316:3 438:19 439:16	conducted 280:4 286:9 372:21 conducting 326:11
comprehensive 276:18 277:1	conductor 263:24 314:24 315:1 384:4
computer 299:19, 23 300:1 389:2 437:19,21 454:6	conductors 326:6, 21,22 371:17,19
concede 470:5	conducts 444:6
concede 470:5 concept 309:25 318:1 455:10	conducts 444:6 confer 478:4 conference 348:4
concept 309:25	confer 478:4
concept 309:25 318:1 455:10 concepts 276:19 conceptual 326:19	confer 478:4 conference 348:4 373:15 409:5
concept 309:25 318:1 455:10 concepts 276:19 conceptual 326:19 conceptually 341:3 378:22	confer 478:4 conference 348:4 373:15 409:5 442:5 conferences
concept 309:25 318:1 455:10 concepts 276:19 conceptual 326:19 conceptually 341:3 378:22 concern 306:8 350:12 401:23 432:8 471:15,16	confer 478:4 conference 348:4 373:15 409:5 442:5 conferences 349:5 351:14 confidence 330:18 confident 260:2 286:14 395:5
concept 309:25 318:1 455:10 concepts 276:19 conceptual 326:19 conceptually 341:3 378:22 concern 306:8 350:12 401:23 432:8 471:15,16 472:3	confer 478:4 conference 348:4 373:15 409:5 442:5 conferences 349:5 351:14 confidence 330:18 confident 260:2 286:14 395:5 confidential 243:24 244:7,8 245:21,24 272:14,
concept 309:25 318:1 455:10 concepts 276:19 conceptual 326:19 conceptually 341:3 378:22 concern 306:8 350:12 401:23 432:8 471:15,16 472:3 concerned 267:20 334:9 413:21 concerns 269:2 330:1,2 355:16	confer 478:4 conference 348:4 373:15 409:5 442:5 conferences 349:5 351:14 confidence 330:18 confident 260:2 286:14 395:5 confidential 243:24 244:7,8
concept 309:25 318:1 455:10 concepts 276:19 conceptual 326:19 conceptually 341:3 378:22 concern 306:8 350:12 401:23 432:8 471:15,16 472:3 concerned 267:20 334:9 413:21 concerns 269:2	confer 478:4 conference 348:4 373:15 409:5 442:5 conferences 349:5 351:14 confidence 330:18 confident 260:2 286:14 395:5 confidential 243:24 244:7,8 245:21,24 272:14, 15,21 274:10 475:20 476:1,13

278:13 398:18

confines 448:7,17
confirm 372:16,19 373:12
confirmed 373:3
confused 256:2 257:25 262:21 265:22 288:13 316:24 364:18,23
confusing 261:11 263:9 336:8 353:23
confusion 258:15 261:12 271:9 392:9
Congratulations 423:22
Congress 468:1
consideration 271:7 288:25
considerations 329:6
considered 262:18 294:6
considers 277:15
consistent 280:2, 16 304:25 369:10 437:10 474:11
consolidation 335:2
constant 352:24 357:10
constitutes 461:10
constructs 281:7
construed 442:4
consultant 305:6 325:16,21
consume 344:10

	Evidenti
)	consumed 256:25 375:10
	consumers 277:18 300:16 357:24 448:17
	contained 288:3
	contemplated 312:16 362:13,25
	content 322:11 363:22
	contents 380:17 381:7
	context 251:8 338:19 366:16 393:17 434:18 435:1,20,25 436:5,17 438:9 441:17,19 444:5 455:16,17 456:10 457:25 463:1,17 471:9,13 472:1
	continue 250:12, 13 262:9 310:12 318:6 321:19 323:1 339:12 345:4 432:1 439:15 466:8
	continued 275:13
	continuing 251:1, 4,5 277:14 325:18,25 326:9, 15 327:9,12 330:25 332:3,8,10 355:2,11,17 356:19 379:4,7,13
	continuous 276:19 387:12 451:25 453:12,14
	contract 273:8,12
	conveniently 247:13

y nearing January 3	r, 2024index. confinesco
conversation 251:10 258:14,22 269:7,9 271:5 291:5,8 306:4,11, 19 322:21,22 323:19 335:9 337:21 366:20 371:6 376:18 377:19,21 378:4 379:24,25 385:7 396:2 478:17 conversations 258:24 289:24 290:12,24 304:23 305:8,12 322:18 333:2 334:4,17, 20,21 345:25 346:11,13,14 converted 373:10 convoluted 304:17 cool 405:15,17,22	261:20 276:6 279:9 284:19 289:21 290:12,23 291:1,7 292:11, 12,14 293:12 298:17 299:4 302:5 309:13 313:14,15 324:8 363:24 366:8 369:2 373:21 376:4,7 378:11 382:19 397:13 400:9 405:24 410:14 412:23 415:17 416:6 421:3,8 424:23 426:16 428:9 430:11,25 445:1 450:11 460:3,4 corrections 244:11 400:2 411:25 412:16
cooperate 297:19 301:22 cooperation 423:13 Coopers 273:1,9,	428:2 correctly 251:19 254:20 256:9 263:11 265:4 286:6 302:21 365:3 378:2 413:20 458:9
coordinator 337:22 copier 275:2 copies 337:14 copy 246:4,5,24 247:4,10 274:17, 22 275:3,7 282:5 291:19 294:16,21 295:6 318:23 359:8 412:13 413:16 476:5 corporate 360:9 correct 245:3 249:23 258:4	cost 244:14,15 247:24 248:20,22, 24 249:1,17,20,22 250:14 252:2 263:23,24 264:10 265:7,16,19 267:10 273:24 280:23,25 281:4 293:22 294:3,10 295:11 296:1,9 297:18 298:23 299:18,22 301:2, 10,21 304:5,11, 14,18,25 305:3,14 306:7,9 311:13 312:20 313:6

		. y 110amog maary 01, 202 m.	acti coot baccancactemere
314:9,12,15,17,22	319:22 333:3	411:7,14 415:10	327:20,24 328:8,
315:7,25 317:13,	355:8 364:3,10	421:16 423:19	18,20,21 329:3,4,
22 321:4 326:11	365:19 452:16	426:12 455:15	7 333:3,8,14,18,
327:5,8,10,12,17	467:9 469:14	476:12	21,24 335:21
328:4 329:20,23	477:20 478:4,21		340:23 342:20
331:11,14 336:11	·	CP 393:10	343:7 344:4,6
340:20 343:20	Counsel's 301:14	create 296:7 313:6	350:9 353:7
346:9,17,22	count 318:24	445:21 447:11	354:12 358:22
350:14 354:7,13	319:15 365:6	aractad 044.44	366:12 367:14,20
355:1,2,21	456:17	created 311:14	369:8,11 374:5
356:12,15 357:24		creating 293:22	375:12 376:21
358:8,14,15	counterparty	294:3 299:12	377:8 388:15
359:21 360:20	409:1	435:4 437:4 454:4	396:15,23 397:10
361:17,18 362:17	counting 392:12	creation 299:2	401:14 402:18
366:11 374:23,24	477:4	461:22	404:10,18,19,20
375:6 378:11,14,	270.7	401.22	407:1,24 408:7,
25 379:8,15 383:6	country 370:7	criteria 312:18	10,21 414:20
· ·	counts 404:20	394:13	416:9,12 417:5,13
387:19 389:10,25 390:2,5,10 391:8	416:9,12 426:4	critical 390:16	425:25 426:4
, ,	454:23 459:11		
414:24 435:3,7,24	460:6	cross 246:17	451:15 454:22,23 455:13 456:17
436:22,25 437:4,	couple 248:10	282:1 350:15	
8,19,25 438:6,14,	263:17 290:1	400:22 413:2	459:10,11,16
18,19,22 441:13	304:24 330:11	428:13 454:10	460:6
443:9 444:9	364:5 366:6	cross-exam	customer's
456:25 464:21,24	367:18 369:6,7	281:21	333:18
465:4,6,11 466:23	375:1 379:19		customers
470:20 471:1,11,		cross-examination	256:15,17 257:3,
18	395:14,19 396:1 406:19 407:18	246:19 247:8	12 259:13,14
cost-based 343:6	424:8 425:20	282:3 365:2 374:2	262:11,12 265:16,
costing 462:17		400:13 401:3	17 267:13,14,15,
Costing 402.17	433:2,3 456:8 458:10 464:5	413:12 415:8	18,22 268:15,16,
costly 465:7		428:25	18 269:21,23
costs 252:12	467:19 474:13,14	crossed 367:7	270:13 271:17
258:16 264:14	court 249:15		280:11 281:9
265:15 284:4	259:24 278:2,5	culture 334:16	284:5 328:9,11
295:12 297:20	328:23 361:22	current 303:17	329:1,10 333:12,
299:11 301:23	465:19	330:20 438:11	23 336:13 341:2
312:14 313:1	cover 461:3,5	453:11 455:20,21	342:14 343:2,3,17
314:11,15,18	·	customer 244:13	344:1,10 350:7,10
315:4 331:23,24	covered 270:5	248:9 255:4,5	351:18 352:12
357:9 361:6 383:3	308:19 334:5	257:2,5,6,7 259:6	
384:3 388:10	338:21	261:2 264:15,18	357:11 370:12,13, 16,23 373:21
390:22 391:2	covering 361:20	265:10,11 266:1	374:6 375:11
396:8,22 426:2		268:3 270:12,19	374.6 375.11
·	covers 287:5	276:15 277:17	
counsel 242:16	Cox 267:1 353:14	288:25 289:3,10	387:8,16 388:17, 20 396:5 401:19
256:6 275:22	402:17 410:24	200.20 203.3, 10	20 390.3 401.19

	Lviderilla	ry riearingsandary 51, 2024	Hindex: customers decision
406:3 408:24	303:4,13,24,25	392:13,25 393:8	426:3 464:20
416:15 417:20,21	305:4 306:10,16,	401:9,20,22	477:23
418:3 425:3 426:5	24 307:15,21,23	402:3,4,12,20	days 290:20,23
448:6 460:16	308:1,5,6,9,17,23	403:9,18 404:22	291:6 308:2,6
464:1,7	309:8,16 310:2,6,	406:18,19,20,21	321:25 322:10,16,
ouctomore!	10 311:14 312:15,	407:3,4,5,6,24,25	20 426:1 464:5
customers'	20 313:6,11,25	408:7,21 409:2,3,	
370:15	314:2,14,16,19,	8 410:11 413:21	467:17
cut 295:25 432:6	20,25 315:1,5	415:14,15,18,22	de 389:25 390:22
451:22	316:6,23 317:2,4,	418:7,18,23	deadline 324:23
cycle 335:14	12 318:24 319:1,	419:22,23 420:18,	469:12
406:24 419:14	10,20 320:3,4,13,	21,25 421:1,7	
420:8,9,19,22	14,23 324:21	422:13,14 424:11,	deal 325:8 335:3
424:11,16,18	326:4,25 328:16	12,14,15,16 426:6	351:17 425:8
425:8 426:6	330:18 331:3	429:14,20 430:22	dealing 331:25
723.0 420.0	333:4,8,18,21	431:21 432:10,21	358:20
	334:18 335:4,7,8	434:9 435:4,8,11	
D	338:7,25 339:2,	437:1,4,6,13,20	deals 318:24
	13,20 340:2,4,5,	440:5,13,17,24	439:19
dab 368:2	21 341:18,23,25	441:2 443:8,9	dealt 402:1
daily 401:14	342:6,7 344:9	445:24 447:11	debated 251:25
403:9,17,22,23	345:17,18 346:24	449:11 453:19	debated 351:25
405:11,13,23	347:1,12,18,22,23	454:4,22 457:1,14	decade 310:7
406:6,11,17,18,	348:2 349:8,10,	458:9,19 459:10,	346:15 347:4
22,23 407:24	13,16,17,20	16 461:14,18,22	decade-ish 289:19
409:15	350:15 351:19	462:19 463:4	357:8
	352:3,7,11,14,25	464:3,22 467:25	
darn 470:11	353:4,8,9,10,18,	476:20	decades 263:17
data 244:13	19,24 354:4,15		330:11 350:12
247:18,19,22	356:15,16 359:1,2	database 437:25	366:6 371:24
248:4,19 250:5	361:5,7,16 362:1	date 250:16,18	December 243:22
251:24 253:15	363:4,16,21	285:4,5,6 286:7,8	399:23 411:21
254:2,19,22,25	364:13,21,24	297:19 301:21	427:24
255:2,5,6 258:5,	365:4,6,10,12,14	322:1 349:3	docido 200.00
10,12,18,19,25	367:1,3,20,21	380:25 404:3	decide 300:22
261:2,6,22	368:1 369:6,9,14	455:25 458:2	311:13,17,21
262:16,23 266:14,	371:3 372:7	477:22	383:2,7 433:24
15 267:6 268:3	375:12 376:15,22	dated 380:2,25	445:10 450:21
270:23 271:3	377:13,16,21	,	451:5,7 452:18
272:19 276:24	378:5 381:17	dates 264:5	453:12
282:13,14,19	384:18,20,24	323:18 393:17	decides 383:1
296:7,8,15	385:21 386:5,7,9,	day 242:3 253:12,	434:15
297:18,21 298:4,	11,13,14,15	13 335:24 351:4	deciding 294:6
16,17,21 299:3,4,	387:21 388:22	368:1 370:16	312:19
12,13,14,15,24	389:3,19 390:9,	372:7 393:14	
300:1 301:21,24	10,25 391:2,7,8,	395:25 405:10,14,	decision 311:24
302:9,10,14	11,12,15,21	16,17 424:13,15	332:4,7 382:17
	, . = , . • , = .		450:24,25 451:14

452:2 466:3,18 468:1,4
decisions 354:16 450:10
declare 381:4
declined 386:9
declining 281:2
deep 329:25 330:13 381:11 465:9
deeper 383:9
deeply 354:15
default 417:21
defer 302:7 312:21 341:8 355:14,17 378:18,21 380:7 389:17 469:18
define 373:23 380:5 394:10
deflected 413:15
degree 437:22
delay 472:11
delayed 255:18
deliver 261:18 267:6 420:8
deliverability 261:16 358:13 462:20
deliverable 348:23 414:25
delivered 261:6
delivery 419:18 462:22
demand 262:6 269:17,18 279:4 288:10,14 328:8 333:21 393:9
demands 370:5

Evidentia	ry H
denied 422:4 474:14,21	de
department 356:22 429:3,4,6, 12,15 430:16 431:13,16 439:8, 18,20 448:14 449:18 451:3,4	de de
department's 438:25	4
departments 461:2,4	
departure 342:8 depend 333:10 368:18	2
dependent 302:24 409:15	2
depending 271:23 375:7,8 377:15 463:20	2
depends 256:12 271:17 303:21 376:12 401:20 434:17 435:1	de de
deployed 279:2	de
deployment 333:25 340:25 342:21 410:8,10 459:15 460:16	de de
depreciation 250:23 379:11 380:10 381:18 382:11	de
depth 330:3	2
DER 276:16,25 277:17	de
derived 375:6	de
DERS 336:18	de
describe 302:22	de

```
escribes 435:19
                    detail 335:15
                     353:22 372:9
escription
                     420:1,6,14
291:13
                    detailed 258:23
esign 243:20
                     261:4 362:21
248:23,24 249:1,
                     387:20 418:23
12 254:9 259:6
                    details 336:21
267:13,21 276:8,
                     341:9 419:4
19 277:16 280:1,
                     467:10
16 284:17 287:22
288:5 294:8 339:8
                    determinants
342:1,2,13 368:4
                     269:11,24,25
378:10 379:8
                     270:2,4,7,10
383:18 387:13
                     343:10 350:23
418:9 427:21
                     351:22 368:6,15,
429:3 439:1,5,11,
                     25 416:8 421:3
14.21 442:23
                    determination
443:3,10,17,18
                     452:25
444:2,9,12,14,22
445:10 446:6
                    determine 270:19
447:10 451:3,12,
                     326:19 370:22
25 461:2 466:1,
                     391:8 417:4
16,22
                     443:13
esignated 477:9
                    determined
                     331:18 378:14
esignation 244:7
                     405:2
245:24 259:10
esignations
                     278:10
259:7 476:1
esignators
475:20
esigned 343:6
388:16 448:21
                     464:13
449:14
esigning 260:11
esigns 276:15
299:19 343:5
366:13 437:25
                     408:10
esire 381:10,19
esires 373:1
esk 242:15
esperately 284:5
                     330:6
```

dice 468:7	362:21 409:4	308:20	431:10 458:8
aice 468:7	362:21 409:4	308:20	459:12 471:18
dictate 294:14	dig 396:21	discovery 297:19,	
differ 395:8	direct 243:11	22,23 298:11	discussions 280:2
differed 468:18	252:21 254:1,3,	301:22 302:17,18	284:24 285:18
	23,24 266:23	306:15,16 317:4,	287:2 323:2,5,8,9
difference 250:9	292:24 315:24	8,18 388:23	328:13 335:7
268:13,14,19	318:14,18 319:21	391:12 409:5	339:17,21 340:17,
322:10 329:10,12,	325:23 345:21,22	440:4,12 441:18,	21 346:3 431:1
13 338:15 365:14	347:6 353:8,11	19 442:2,5,19	432:11 457:25
374:11,12 393:9,	359:1,18,22	discrimination	disincentives
11 402:19 408:17	364:20 367:11,12	382:5	368:16
463:24 464:17	368:24 390:17	discriminatory	disparities 254:19
differences 281:9	399:12 411:10	250:2 266:4 350:3	281:16 343:16
284:7 336:12	419:3,12,13	367:7 382:16	344:9
383:3 405:6,21	427:12 438:18	388:4,8	
463:21,22	444:7,8 458:18	,	disputes 297:23
differential 402:10	462:16 463:4,15	discuss 242:7	298:12 302:18
403:6 406:3	465:5 470:13,15	266:11 267:2	306:16
408:13,24 424:21	472:24 476:21	275:17 288:9 321:24 366:24	disrespect 374:16
464:2,8	directed 301:19	434:7 455:23	dissimilar 258:12
,	322:21 391:13		
differentials	419:3 429:22	discussed 254:15,	distinct 364:18
395:10 438:10 449:4,7	directing 391:22	17 257:18 259:11	distinction 338:15
,		268:7 293:24	distinctions
differentiated	direction 446:19	333:9 351:11	248:12,25 451:18
282:10	directly 252:24	394:24 398:17 472:6	distributed 276:16
differentiation	272:16 276:25		277:8 324:4,11
314:23	372:23,24 432:15	discussing	,
differently 260:24	443:5 471:1	259:15,18 291:22	distribution
266:1 306:21	director 447:12	358:12 404:25	252:11 255:9
342:15 344:1	directors 202.5	415:19 424:24	263:17,20 264:4,
348:10,11,14,17	directors 293:5 301:14 304:23	434:24 460:3	7,22 265:19
349:2 350:8,11	301.14 304.23	462:19 478:22	283:19 297:18,21,
351:18 354:18,20	· ·	discussion 244:6	25 301:21,24
387:8 425:3	disagree 283:5,21	253:14 254:11	302:9,14,19,23
	284:7 292:19	272:15,16 275:15	303:1,20 304:18
differing 437:22	310:17 320:9	287:18 288:19	305:13,15,21,24
differs 300:23	339:24 353:2	289:5 303:1 317:1	306:6 307:2
450:22	380:22 386:16	322:4 326:12	308:11,19,20,21 310:2 313:21
difficult 346:3	449:13,16	331:17 341:4,20	314:17 316:1,14,
365:13 449:2	disagrees 475:11	349:1 366:23	17 318:4 326:1,5,
458:19 464:15	disclaimer 292:11	375:19 376:24	10,12 327:24
difficulties 435:22	293:2 430:18	379:4 395:17	328:7,12 329:22,
		396:18 409:10	24,25 330:13,24
difficulty 334:15	discovered	410:7 430:18,19	331:6 332:17
			VIEVITA C

duly 243:9 399:10

339:13,20 340:4 342:6 349:16,20 355:10,25 356:6, 7,11 357:1,2 360:6,7,15 361:6, 10 366:5,14,21 367:21 371:11 372:10,12 376:21 377:4 380:1,12,24 381:4,8,9,11,17 382:14 383:10,14, 21 398:11 429:23 districts 335:2 dive 329:25 330:13 381:11 383:9 465:9 **division** 243:20 293:5 301:14 304:22 305:19 447:13 docket 276:5,8,9 278:20 279:14,22 297:22 302:16 306:14 307:15 309:6,14 310:13, 20 312:6,7,11 313:3 336:20 357:13 372:24 378:18 383:21 386:12 390:11 409:1 417:15 430:24 431:12 docket already 384:8 docketed 431:24 **dockets** 346:15 431:13 document 244:18 285:16 292:6,15, 20 319:5 366:18 380:10,14,16,23 381:5 398:3,17 400:6 412:1 422:22,24 423:1,6

428:3.6 471:6.10 documentation 314:12 documents 244:11 381:1 400:3 **Dolges** 338:24 dollar 247:23 327:14 328:10 397:8 dollars 298:23 360:2,3 362:17 371:11 403:4 door 322:7 **double** 426:15 475:5 doubt 253:3 362:24 386:18 dozen 375:2 **drafted** 367:14 455:24 **Dragoo** 256:24 257:14,18,22 362:4 363:1 **Dragoo's** 354:5 **draw** 312:12 369:25 423:2 drawn 279:11 drill 378:8 **driving** 453:21 dropping 371:17 **DRS** 251:18,22 299:4 308:22 316:24 363:8,13 386:10 391:12,13, 24 392:1,7,10,11 due 274:10 319:16 342:9 371:22 457:3 477:4,22

411:8 427:10 **dumped** 332:17 duplicate 391:25 duplicative 392:21 Ε eager 276:9 **earlier** 249:16 269:4 304:20 311:4 322:25 357:14 359:25 364:22 393:13 430:10 436:21,23 460:2,14 477:21 earliest 352:15 **early** 332:12 339:21 366:20,22 earning 383:5 ease 247:3 460:9 easier 245:17 274:3 295:6 387:24 465:23 471:13 **easiest** 338:21 **easily** 402:2 easy 314:9 454:5 EC-2024-0092 291:25 318:9 **echo** 470:6 471:25 economist 243:19 399:20 Education 260:2 effect 256:8 291:6 371:16 478:25 effective 321:25 effectively 258:16 259:5 260:10

331:4 376:10 378:13,24 420:13 effort 251:4 313:12 314:2 315:11 467:22 **EFIS** 242:10,17 306:25 307:4 412:5 455:3,5 469:14 electric 266:13 279:1 333:4 334:12 338:9,11 342:16 343:17 353:12 408:1,2 425:3 459:22 **element** 276:20,23 288:14 346:22 388:24 415:23 416:5 elements 250:4 265:25 266:1 281:4 329:23 381:6,7 382:4 387:19 472:12 eliminate 258:16 329:19 350:12 455:5 eliminating 472:1 elimination 330:17 email 246:3,6 475:21,23,25 476:8 477:21 **emailed** 347:19 emailing 476:15 **emails** 347:16 embedded 327:12 **Empire** 268:6 394:25 408:20 employed 243:16

306:21 317:16

249:4 399:17 411:15 427:17,19
employee 423:22
employees 437:22
enact 273:24
encompass 377:14
encourage 409:18 468:9
end 242:15 281:14 289:23 303:8 316:17 330:18 336:19 343:19 350:11,13,16,17 351:4 352:13 353:25 368:1 373:17 387:9 397:21 418:19,21 422:7 443:22 456:13
endeavor 272:15 375:23
ended 309:24 310:12 349:2
ending 353:10 420:4 477:2
ends 467:3,4
energy 256:25 260:6 266:20 276:16 277:8 324:4,11 343:21 344:10 374:7,23 375:10,14 376:4 387:17 393:21,22 394:3,5,17 401:14 405:9,15 408:14 409:14,18,21
enforce 356:7
engaging 340:16
engineer 327:1,2 454:3

Evidentia
engineers 303:2 305:16 328:14 331:17
enhance 276:15 277:16
ensure 249:25 388:7 454:22,23
ensuring 281:8
enter 397:23
entered 247:2 248:15 309:20 381:15 389:5,17 423:6 475:6
entire 464:10 465:11
entirety 465:10 467:17 470:15 472:2,16,17
enumerated 319:20 320:4,13, 14
envisioned 248:15
EO 312:6,7,11 390:11
EO-2024-0002 242:4 345:1
EO-94-199 476:25
equal 342:12 368:3
equally 248:7,8 268:23
equals 373:20
equation 405:19, 20
equipment 387:17
equivalent 396:23
ER-129 477:16

272:7,19 273:8,9, 13,22 275:22 278:25 280:22 282:8 283:5,8,10, 15 284:1,23 285:4,17,19 286:7,11,14 287:2,3 288:20 289:5,13,18,23,25 295:10,11 296:1,6 297:17,19 298:16, 21 299:23,25 301:20,22 303:17. 20 305:14 306:12 307:2,5,7 309:7,9, 14,15 311:6 313:11,17,21 315:11 316:4 317:5,10,15 319:22 321:7,24 322:25 323:7,10, 11 326:2 328:22, 25 330:24 332:6,8 333:25 334:19 335:3,5,9,12,18, 21 339:18 340:10, 25 341:17 343:25 345:13 346:7 347:9,23 348:17 351:5 352:11,18, 19 353:8,9 354:1, 4,6 356:7,19 359:2,20 360:6,8, 9 361:5,7 362:14, 24 363:11,16 365:15 367:16 368:8,12 370:8,9 371:10 372:15,21 373:4 374:5,7 376:13 378:9,15 383:21 385:12 387:10 388:16 389:2,6,12,16,19 391:1,7,13,14,22 392:2,8,14,15 394:9,20,23,24 395:5,16 401:22

402:5 408:22 409:4 419:9 423:13 424:12,14 426:2 429:23 430:2 432:17 434:8 435:10 437:16 438:2,11 442:12 443:8,14, 20 444:15 454:21 455:1,3,10,18 457:18 458:9,21 459:20 460:15 461:21,23 462:11 463:2 472:14
Evergy's 248:12 263:8 284:17 290:19 309:17,19 310:18 313:10 315:5,24 316:22 323:6 335:7 342:2 344:10 346:21 350:6,10,24,25 359:18,21 369:3 373:1 383:17 387:7 388:5 389:1 432:22 438:11 446:4 464:5,23
everybody's 426:24 467:14
evidence 245:7 246:8 274:14 287:14 296:4 324:14 380:15 381:15 400:12,17 413:1,6 422:8 423:16 428:13,17 443:20 452:11 453:18 469:9 470:9 472:18 475:2
evidentiary 242:3,

402:5 408:22	EW-2017-0245
409:4 419:9	275:19 276:13
423:13 424:12,14	277:9 280:5
426:2 429:23	324:5,10 475:17
430:2 432:17	exact 258:10
434:8 435:10	273:1 276:21
437:16 438:2,11	304:6,7 345:12
442:12 443:8,14,	364:12,19 365:5
20 444:15 454:21	378:22 431:20,21
455:1,3,10,18	EXAMINATION
457:18 458:9,21	243:11 387:1
459:20 460:15 461:21,23 462:11	399:12 411:10
463:2 472:14	425:21 427:12
	460:24
Evergy's 248:12	
263:8 284:17	examine 270:7
290:19 309:17,19	examined 243:9
310:18 313:10	399:10 411:8
315:5,24 316:22 323:6 335:7 342:2	427:10
344:10 346:21	examples 259:11,
350:6,10,24,25	15,18 297:25
359:18,21 369:3	396:2
373:1 383:17	Excel 392:12
387:7 388:5 389:1	
432:22 438:11	Excellent 375:21
446:4 464:5,23	398:23 469:7
everybody's	472:14 476:10 478:25
426:24 467:14	
	exception 249:10
evidence 245:7	excerpt 365:1
246:8 274:14 287:14 296:4	470:25 471:3
324:14 380:15	exchange 347:25
381:15 400:12,17	excluding 373:15
413:1,6 422:8 423:16 428:13,17	exclusive 271:13
443:20 452:11	excused 398:24
453:18 469:9	410:23 426:13
470:9 472:18	467:4
475:2	exhibit 243:24
evidentiary 242:3,	245:6,7 246:4,8
5 368:9 471:10	247:1 272:11
EW 276:9 417:14	274:4,6,10,12,14
EW-2017 279:24	277:3 285:9,13
336:16	287:9,12,14,17

```
324:6,12,14,19
 325:9 380:8
 389:21 397:19,23
 398:4 399:25
 400:12,15,17
 411:22,24 413:1,
 5,6 421:23 422:1,
 3,8,10,12 423:14,
 16 426:24 427:25
 428:12,16,17
 468:25 469:3,9,
 11,15 470:8,9,12,
 14,19,23 472:15,
 18,22 475:4,15
 476:11,24 477:1,
 3,5,8,13
exhibits 397:21
 426:22,24 468:19,
 20,21,22 472:20
 474:24 475:1,6,7
 477:6,7,19,25
exist 281:17
 282:16,19 283:1
 309:16 313:7
 328:8 336:6
 352:14 440:5,14
 441:6,22 442:2,20
 445:24 447:12
 462:22,23
existed 282:17
existence 328:9
existing 248:12
 250:4 254:19
 266:5 284:18
 310:18 312:25
 313:1 342:8 344:9
 383:18 387:7,14
 388:4,5,16 453:11
 473:2
exists 252:5
 309:19,20
expand 333:7
 461:12
```

```
expect 242:20
 246:14 306:16
 331:15,19 340:18
 391:10 395:23
 459:17 462:3
expected 287:23
 311:12 345:18
 346:16,19 362:14,
 19 391:6 418:7
 440:4.12
expecting 464:19
expend 295:18
 298:6 385:12
expenditures
 361:10
expense 282:9
 283:6,12,16
 313:21 316:1,14
 361:12,13,14,15
 371:17,23 372:10
 388:18
expenses 252:12
 295:12 314:16,18
 361:8
experience 334:11
 335:20 440:2,11
 461:9
expert 272:7,8
 299:17,22 300:2
expertise 299:10,
 16 437:18,23
expired 344:23
 421:21
explain 321:3
 325:19 333:6
 369:16 390:14
 391:4,23 393:9
explaining 319:21
explains 268:25
 409:16
explanation
```

		· · · · · ·	<u></u>
246:24	373:20,24 374:4,	favor 446:5	433:24 444:7
explicitly 436:10	9,11,12,18,20	feasibility 294:11	457:21 464:20
expressed 259:13	375:16 405:14,24 406:23 409:17	feature 266:16	472:10 475:22 476:21
extension 314:11	425:1 437:6,9	394:9	
	,	features 388:5	filed 243:21 245:2
extent 249:12	factors 375:8 395:8		253:1,8,20,21,24 254:7,24 255:16
256:18 257:23 281:16 284:8		February 423:24 477:22,24 478:2,	276:8 277:7,8
315:24 318:16	factory 264:15	10	287:1 290:16,17
325:24 329:14	facts 253:6 287:20		306:17 307:14,20
340:13 347:16,23	355:4 448:24	federal 281:11,15 376:3	310:21 314:1
387:11 388:14	452:10		318:15 323:12
401:23 461:20	failed 294:19	feedback 276:10	324:5 346:20
463:10,23 464:8	297:17 301:20	289:9,10 290:21 373:9	367:13,18 385:10 398:20 399:21,23
466:21	failing 369:5		411:19 412:3,5,
extra 248:10	failure 290:19	feel 242:20 247:20	17,20 427:22,24
274:22 297:11		255:13 331:3 422:24 452:16	431:11 433:10,18
extrapolate 341:7	fair 259:3 260:14 270:21 300:5	453:7 473:23	455:3 469:12
eye 289:6 323:5	330:21 364:3		474:3 475:16
330:1 478:24	391:6 446:15,18	feet 327:8	477:18,25 478:13
	452:20 457:16	felt 269:10 282:12	files 311:10
F	fairly 252:22 253:2	fence 446:4	filing 253:11,25
	262:12 266:16	FERC 308:11	254:2 266:23
F-E-R-C 376:3	281:7 282:2 341:6	372:3,8,9,10	290:1 306:16
FAC 373:21	371:14 396:12	376:3	310:21 318:18
374:15,18,20	fairness 372:8	fewer 268:17,20	345:22 347:6 349:3 353:11
375:15 395:7,9	faith 313:12,17	371:22	359:18 372:17
facetious 412:10	314:2 315:11	field 251:2,6 252:3	430:21 431:9
facilities 264:19	316:15	327:15	433:22 439:23
265:12,14,17	fall 346:12,13	fifteen 332:25	458:19 463:4
388:16	347:10 359:23		filings 307:3
facilities' 262:6	362:13 371:8	figure 253:18 303:16 313:2	456:10 478:25
facility 287:23	468:25	352:2 377:3	final 312:10
•	falling 425:6	402:21,24 404:6	418:19 423:3
facility's 255:7	falls 381:7	468:1,10	Finally 280:14
264:20	familiar 272:8	figuring 261:18	
fact 273:1 275:2,		317:12	financially 448:22 449:15
17 317:3 322:17 346:14 354:19	familiarity 356:23	file 242:3,9 290:11	
423:3 457:1	fashion 456:15	311:5 332:12	find 267:9 295:23
461:23	fast 287:12	344:25 353:8	329:14 347:21 357:21 360:22
	fault 261:13	372:2,3,8,9,10	368:19 370:25
factor 244:14 293:23 294:6	1 auil 201.13	396:1 411:23	372:6 375:21
233.23 23 4 .0			3.2.0 3.0.2
	I	I	1

438:14	444:20,21 445:1,	format 253:16	front 247:11
finding 157:11	7,17,18 446:10,13	434:22 441:11	261:12 282:5
finding 457:11	447:7,8,17 448:1,	462:1	291:17 381:2
fine 251:9 258:11	13 450:1,2,7,11,	formed 265:5	413:17 439:6
321:6 324:2 325:6	15 451:2,10		447:9 457:24
342:13 349:19	452:6,15,20	forthcoming	fruit 389:10
414:12 476:7	453:9,16,24	432:12	
finger 307:10	454:2,9,12 460:20	forthwith 319:18	fruitful 323:4
	461:1 469:6		fryer 369:20,22,
finish 467:10	470:22,24 472:25	forward 242:20	24,25 370:3
firm 272:25	473:18 474:5,10	249:23 264:12	393:14
Fischer 242:8,21	476:4 477:11	281:4 288:4	f
245:23 281:22,25	fit 276:25	293:23 296:22	fuel 244:14 350:23
282:4 285:8,11,		297:13 298:5	373:17,19 374:21,
14,15 287:8,10,16	fix 352:17	301:18 302:11	22,24,25 375:5
290:10 291:24	flagged 259:4	312:5,10 321:2	full 250:6 263:20
292:3,4,22 293:11	323:23	335:22 352:23 353:3,5 355:20	274:11 278:8
296:24 297:8	flexibility 279:5	366:10 380:20	348:1 352:10
298:1 302:1,4		410:25 418:13	366:24 403:20
306:13 309:2,4	flipping 261:13	438:12 443:5,19	471:13 476:21
311:2,7,8,18,25	286:22	452:21 456:2	fully 268:4 279:1,2
312:17 315:20	floor 242:22 345:3	462:10 468:5,11	413:24 414:25
318:5,7,19,22		·	434:12 435:14
319:9,25 320:1,	flow 292:2 375:13	foster 373:5	
10,12,18,20	focus 366:3	found 253:24	function 367:2
321:10,12,16,19,	415:15	474:19	405:20 466:19
20,22 322:14	focused 248:20	fourth 310:5	functionalization
323:17,22 364:12,		366:15	326:2 328:2
15 379:19,22	focusing 334:25		functionalize
381:16 382:9,22,	folder 274:19	frame 403:14	328:1
24 384:11,13	294:19	456:7	fundamental
385:3,25 386:1,	follow 300:17	frankly 248:23	445:22
20,22 388:2,9	353:6 449:19	252:7 279:19	443.22
389:1 398:6,8	450:9,17,18,20	281:6 303:13	fundamentally
400:24 401:4	476:15	307:6 331:20	442:24 444:3
407:11 410:19		336:22 348:17	445:9
415:6,7,9 421:9	font 293:4	350:20 364:23	future 260:11,13
422:7 423:9,10	forced 389:14	367:23 368:21	269:13 275:25
425:17,18 426:9	forego 400:22	376:12 380:7	288:5 290:8
428:23,24 429:1		388:24	324:24 339:23
430:7,12,14	foremost 325:25	free 452:16	340:19 341:16
431:20,25 432:2,	forgot 275:10		354:23,25 356:21
3,8,20 433:4,6,8,		frequently 326:16,	418:3 452:3
16,17 434:3,5	form 306:24,25	17	478:25
440:9,10,20	307:3 308:11	fresh 361:13	fuzzy 323:14
441:16,25 442:14	372:3 373:11		1 uzzy 323.14
443:2,14,17,24,25	465:17,18,19		
		<u> </u>	

handle 401:22

handled 312:10

G
gave 268:3 420:14
general 260:24 319:22 339:9,24 343:17 347:13 362:21 394:1 415:24 438:9 439:22 444:5 451:13 455:16
generally 244:23 287:19 300:21 357:2 377:10 434:20 446:21 450:25 457:24
generating 460:9
gesture 475:22
gesturing 361:22
give 242:17 255:9 256:6,22 258:20 263:22,24 268:15, 19,21 289:13 291:19,24 294:23 311:5 319:14,16 324:22 338:18 348:2 351:13 353:17 357:3 360:23 363:7 364:20 368:8 369:6,8,14 383:7 386:17 390:4 402:17 420:7,11, 14,15,16 421:25 426:4 440:23 443:16 449:6 453:10 454:13 461:24,25 463:11 giving 253:16
329:6 337:10 362:24 369:12

glad 441:8

20,25

goal 349:8,9,14,

God 473:21
good 243:6,7 247:6,7 248:2 253:14 260:16 278:10,18 281:22, 24,25 288:6 295:21 299:1 303:25 313:12,17 314:2 315:11 316:15 322:21 325:12 335:4 359:12 364:20,22 367:24 388:24 399:7,8 411:5,6 413:10,11 421:4 427:7,8 452:21 466:23 471:3
gosh 249:8 470:11
grab 294:20
grade 366:16
gradually 342:18
grand 248:10 252:10,11 304:22 311:6 346:17 354:7 384:1,2,22
grant 319:23
granular 259:6
great 242:18 294:22 321:1 345:16 346:24 355:6 371:7 401:23 425:8
greater 314:13
greatness 424:3
green 261:15
ground 252:16 279:6 310:3,16 332:23 357:21 361:20 457:11 grounds 306:1 397:25 423:11
301.20 720.11

Hearing	January :
groupings	
growth 308	8:14
guess 245 260:22 286 299:16,22 305:1 312: 321:16 336 352:15 366 382:10 386 387:13,24 392:23 396 414:20 419 434:22 446 448:10 456 455:6 458: 462:8 466: 469:24 guesses 3	0:22 300:4 :6 0:12,15 8:1,17 6:2 389:25 6:19 9:6 0:23 4:1 :19
guys 254:6 263:12 46	
н	
Hahn 246:: 337:1,8,23 338:3 344: 345:3,5,7 363:25 368 376:14 388	3,25 :15 351:23 5:10
Hahn's 337 395:3	7:4
half 278:11 304:15,16 307:4 354	306:22

392:7,8 397:12

hand 242:25 318:23 401:25 410:25 427:1 446:4,8 469:1

handed 430:10

handful 305:12

8	handling 297:1
	hands 328:23
	hanging 389:10
5	happen 247:10
	274:22 294:16
5	317:6,7,15 331:19
)	459:24
	happened 242:16
	269:16 279:2 291:2 364:22
	happening 329:5, 9
	happy 309:25
	hard 332:20
6	402:21 468:15
5	Hatcher 242:2,4,
	14,22,25 243:4,25
_	244:3 245:9,15 246:1,10,18,22
_	272:13 274:9
	277:4 280:9
	281:20 285:10,12
	287:10 290:5 292:23 293:10
	297:5,10,14,16
	306:1,3 311:1,12,
	22 312:2 315:21
	316:11 318:21
	319:12 320:9,15, 19 321:10,19
)	322:3 323:22
_	324:2,8,16 325:7
	337:1,17,19
	344:17,22,25
	349:23 364:2,7 365:16,23,25
	375:17 379:18,23
	381:21,24 384:12,
	17 385:24 386:22
	397:11,20 398:6,
	14,20,23 399:5
	Line HAACE NIEVITAS

400:14,19,24 407:13,20 409:24 410:17,20,22 411:4 412:6,10 413:3,8 415:6 421:11,20 422:20 423:9,14,18 424:5,10 425:12, 17,19 426:12,18 427:5 428:14,19, 23 431:25 432:5, 16 433:1,15 434:1 440:9,15 441:15 442:3 443:11,18, 24 444:20,24 445:4,15 446:2,12 447:1,4,7,15,21, 23 448:9 449:24 450:5,8,13 451:9 452:7,12 453:2, 14,19 454:11,17 458:23 460:19,21 466:7 467:3,8 468:13 469:7,11, 17 470:1,7,11 471:3,15 472:3, 13,17,20 473:5, 10,15,20 474:1,8, 11,24 475:3,24
476:10 477:12,18 478:8,20
hate 300:7 471:5
head 260:5 343:24 368:2 375:4 407:7 448:14 477:14
heading 254:9 296:21 297:12
heads 334:6
healthy 448:22 449:15
hear 311:22 367:4 381:21 421:24 432:6 462:4 475:11

Evidentiar	y
heard 246:4	
252:15 255:23	
256:9 274:9	
278:16 289:25	
311:23 321:12	
324:9 337:20	
366:25 372:16	
400:14 407:8	
413:3 416:18	
428:14 449:25	
470:2 477:6	
hearing 242:3,5,	
15 246:6 253:19	
255:18,24 274:13	
287:13 307:2	
319:17 321:2	
324:13 330:17	
345:11,14,19,21	
400:15 407:17	
413:5 420:25	
424:7 428:16	
441:10 454:14	
458:9 459:2 464:4	
467:12,19 474:25	
476:19 478:15	
hearings 467:23	
heat 323:20	
405:20	
Heating 260:1	
heck 289:7	
held 284:25	
helped 452:12	
helpful 245:16	
293:7 327:16	
348:8 356:8	
358:4,23 360:1	
363:3 381:9	
436:15 456:7,11	
ŕ	
hey 255:8 263:22	
311:5 336:16	
346:16,17 348:2,	
21 372:8	
Hickman 396:3	
HICKIIIAII 380.3	

Hearing	January 3
high 360:2 4 17,23 408:1 417:20,21 4 446:6 465:1	13 124:21
higher 335:: 406:3 464:2 470:8	
highest 262 357:3 393:2 417:23	· · · · · · · · · · · · · · · · · · ·
highlight 47	71:23
highlighted 295:17	
highly 305: 468:9	10
hire 305:5	
hiring 454:6	6
historic 327	7:17
historically 405:8 407:1 422:13	
history 347 461:15,17	:8
hit 347:20 3	68:2
hitting 254: 367:3 370:1	
hold 357:10 404:12)
holding 287 470:14 472	
Holsman 24	16:13
honest 316: 340:25	:12
honestly 407:10)2:15
Honor 246:2 274:5 291:2 397:16 422 425:16 428	21 :9

478:3
hope 274:19 281:25 282:1 285:22 294:18 307:7 312:4,22 313:8 314:6 320:25 327:19 332:14,23 349:17 355:4,5 357:12 425:7 460:10
hoped 317:6,15
hopeful 320:19
hoping 263:12 269:1 286:23
hot 409:19
hotter 405:16
hour 273:16 337:10 369:17 370:2,17 393:15 394:15 400:21,25 456:18
hourly 334:18 335:8 350:15,17 353:18 354:4 369:2,5,11 370:24,25 375:7 397:4 402:6 403:18 404:19,22 405:11 406:1 407:3,4,5 408:11 410:11 414:22 424:19,20 454:22 459:10,15,19 462:2
hours 267:10 273:19,21 274:2 304:24 333:15 375:10 397:12 403:20 405:14,16 409:21
house 305:5,8 397:7,10 405:16, 17,22

445:18 471:21

huge 280:20 330:3 ignore 280:22 425:24 increase 368:4 343:2,4,13 403:1 444:8 hundred 267:16, **improper** 469:21, ignoring 344:12 24 470:5 17,18,19 268:15, increased 357:11 361:1,2 436:25 17,20,21 273:19, improvements increasing 371:18 21 274:2 298:23 439:13 imagine 372:6 incremental 304:24 333:11 **Immediately** imprudent 295:18 346:22 358:5,16 362:17 253:12 296:6 298:3,9 369:8 increments 369:1 385:11 422:25 imminent 259:23 hung 438:2 **incurred** 371:23 437:12 impact 267:22 hunky-dory independent imputation 367:22 269:20,22 270:19 332:21 299:11 444:6,15 288:25 327:20 **impute** 368:10 445:20,25 466:2, hurry 281:11 329:7 344:4,6 **in-house** 326:12 17,20,24 362:2 377:17 inability 334:15 independently hypothetical impacted 278:15 355:12 327:10 452:10 inappropriate impacts 261:2 278:15 **Indiana** 336:20 hypotheticals 267:15 270:12 452:5 **inclined** 471:19 individual 269:1 289:4 329:15.16 273:16 293:13 333:12 369:12 include 245:20,21 ī 296:3 391:2 262:12 299:2 **impetus** 438:4 392:24 393:3 301:15 318:25 implement 294:5 438:19 467:15 **latan** 249:9 333:20 391:21 299:19 301:2.10 individually 362:8 idea 250:8 293:14 392:22 416:9 implementation 429:24 310:16 368:5 included 258:6 294:10,11 368:3 371:8 383:23 **induce** 343:6 276:7,20 278:23 408:6 405:23 465:3 279:7 293:15 industrial 262:3 466:23 **implies** 363:1 298:21 299:6,8 289:16 343:18 372:24 392:24 ideal 402:16 importance 383:5 451:13 395:9 420:4 421:7 244:13 402:23 **Ideally** 395:12 industrials 263:6 433:11 438:23 456:24 455:20 264:8 444:11 456:19 ideas 289:16 **important** 248:7,8, 462:16 470:19 **inform** 438:7 10,13 250:21 identical 329:10 **includes** 265:25 information 266:12 325:20 277:14 280:25 identified 275:12, 244:13 249:21,24 328:24 339:2 350:7,10 415:19 250:10,12,16,18 19,23 276:3,6 342:3 360:5 361:9 430:17 438:18 251:12,13,24 278:18 364:19 379:5 393:6,11 252:6 255:5,6,22 366:12 398:12 including 328:14 405:12 408:12 257:16 258:2 437:6,9 439:25 408:10 439:21 identifies 272:25 259:8 261:18 456:1 466:19 277:12 inconsistent 265:15 268:1 imposing 452:15 293:6 **identify** 361:6,8 270:7,18 272:16, 390:9 imprecision 329:8 incorporate 22 276:22 279:15 354:16 367:17 281:12 282:16 identifying 276:13 impression 415:23 283:1 284:17 364:18 366:4,7

287:22 288:24
289:10 293:22
294:4 297:24
298:12,13 299:9
·
302:19,24,25
303:13,16 307:9
313:21 314:13
316:1,2,14 318:11
328:14 329:17,18
330:5,10 334:2,
15,18,19 335:21
338:8,11 339:22
·
340:24 341:14
342:5,20 346:6,19
347:8,15,24
348:12,13,15
351:20 354:12
357:5 359:20
361:19,21,23
, ,
367:5,15,23
368:8,17,18
369:13 372:1,2,25
373:24 374:13
376:22 377:4,9,13
378:16 382:4
384:3 386:7
387:4,11 389:4,10
390:6 393:5
394:18,23 395:20
396:24 397:5,10
402:9 403:15
408:12 416:14
417:11,13 418:10
419:16,18,20
420:15 434:7,9,
19,20 435:4,11,
17,22 436:3,12,
18,19 437:4,7,9
438:5,15 441:10
442:1,12 448:25
449:1,6,8 452:14
' '
454:5 455:2,3,14,
16,20,21,25
456:4,6,9,11,14,
16,18,19,23,25
457:9,22 458:3,18
459:19 460:7,11
,

Evide
461:22,24,25
462:3,4,9,17,21,
22,23 463:5,12
464:1,6,9,23
467:9,24 468:10
469:22
infrastructure 410:14 460:3
inherent 329:8 339:15

Initial 478:1

initially 262:4

inputs 376:7

install 264:14

inherently 370:10 initiated 254:4 input 375:15 395:6 429:8,9 477:7 installation 252:4

installed 326:17 396:15 instance 420:3

instances 339:11 391:15 445:23 456:8 463:9 473:16

instruction 303:22 instructive 357:17

integrated 343:21 375:1

intend 401:17 472:12

intended 287:18 448:5,16

intensive 307:24

intent 343:4

intention 340:12 393:7

interchange 376:9 395:5

interest 259:13 383:15 452:13 457:11

interested 285:18, 24 290:3

interesting 269:7 441:7

interests 300:15 446:25 447:20

interject 316:11 365:17

interlocutory 312:6,9

intern 252:3

internally 334:8 455:23

interpret 251:21 304:1 442:9 474:15

interpretation 354:25 355:4 386:17 422:25

interpreted 354:18,20 356:5 433:3

interpreting 251:19 450:9

interrupt 244:3 292:1 324:1 421:13 451:21

interruption 466:9

interval 369:17 393:21,22 394:4,5 418:6

intervenors 444:10

intrinsic 261:7

introduced 476:18 introducing 257:11 274:4

introduction 269:19 274:6

investment 332:19 372:12

investments 460:8

investor-owned 287:19

involve 277:2 303:1 384:24

involved 264:9 275:11 279:20,21 334:17 370:19 377:21 431:1,10, 14 457:19

involves 431:20 432:9,10

involving 431:15

IOUS 338:9,11

irrelevant 299:8

irrespective 435:3

issue 259:16,17 260:22 263:1,6,7, 9 268:8 269:11 270:16 274:7 276:1 295:9 307:9,22 317:8 322:9,12 327:10 328:3 331:15 339:1 347:12 356:20 365:3 371:15 374:19 402:9 413:25 414:14,18 415:1 437:3 442:6,11 443:15,20,22 455:5 458:10 462:10,14,18 464:10,11 468:2

itamatina OFO.4
iterative 353:1
J
January 352:13
job 300:12 331:3 367:2
jogged 264:24
John 325:22
joining 246:15
joins 474:4
joint 253:6,24 254:5
Judge 242:2,4,8, 14,22,25 243:4,25 244:3 245:9,15 246:1,10,18,22 247:21 272:13 274:9 277:4 280:9,12 281:20, 22 285:8,10,12 287:8,10 290:5 291:24 292:23 293:10 294:24 297:5,7,8,10,14, 16 306:1,3 311:1, 7,11,12,17,18,21, 22 312:2,19 313:5 315:21 316:11 318:5,19,21 319:12 320:9,15, 19 321:10,19,21 322:3 323:22 324:2,8,16 325:7, 11 336:24 337:1, 14,17,19 344:17, 22,25 349:23 364:2,7 365:16, 17,23,25 375:17 379:18,19,23 381:16,21,24 384:12,17 385:24 386:22 393:13 395:7 397:11,20

,
398:6,14,20,23
399:5 400:14,19,
24 407:13,18,20
409:24 410:17,19,
20,21,22 411:4
412:6,10 413:3,8
415:6,7 421:11,
20,21 422:4,20
423:9,12,14,18
424:5,10 425:12,
17,19,23,24
426:12,18 427:5
428:14,19,23,24
431:20,25 432:5,
16,20 433:1,15
434:1,4 440:9,15
441:15 442:3
443:6,11,18,24
444:20,21,24
· ·
445:4,15 446:2,
10,12 447:1,4,7,
15,21,23 448:2,9
449:24 450:5,8,13
451:2,9 452:7,12,
20 453:2,9,14,19,
25 454:9,11,17
458:23 460:19,21
466:7 467:3,8,13
468:12,13 469:6,
7,11,17 470:1,7,
11 471:3,15
472:3,13,17,20
473:5,10,15,18,20
474:1,8,11,24
475:3,24 476:10
477:4,12,18
478:8,14,20
470.0,14,20
Judging 475:22
judgment 331:25
348:25
July 253:7 346:20
347:10
jumping 269:3
339:19
June 253:1,8,11,

24 254:4 256:2 367:12 jurisdiction 336:10 jurisdictions 263:7 394:10 justification 281:1 justness 382:3 Κ **Kansas** 380:24 **KCPL** 264:9 265:24 **keeping** 386:12 **Kerr** 242:22,24 243:6,12 244:2,4, 9 245:6 246:16,17 290:4 292:20 301:25 302:3 305:25 306:2 309:1 310:24 311:15,20 315:18 319:7 320:7 321:9,14,17 322:2 325:2,6 337:14,18 363:8,12,17,19,24 381:13,21,23 382:21,23 384:10, 14,15 385:23 386:24 387:2 397:11,14 398:21, 22 399:7,13 400:12 410:21 411:5,11 412:4,8, 14 413:1 425:19, 20,22 426:10,17 427:6,13 428:12 430:5 431:17,23 432:6,16,17,24 433:13,20 440:7 441:14,23 443:1, 7,23 444:19 445:4,12 447:2,6,

		,	i, zoz ililaoki rtoli oliziboli
22,24 448:8	336:6 338:13,17	10 435:19 436:23	learning 351:8,9
449:21,24 450:12,	339:3 400:10	455:14 456:9,24	leave 249:19
23 452:5,9 453:18	412:24 419:17	468:14 476:14,21	256:3 271:11,24
460:22,25 465:21,	428:10	Lange's 245:18,20	297:22 302:16
22 466:12,14	Kolkmeyer 246:14	324:16 470:13,15	310:20 313:3
467:1 469:20	KV 257:6,8 303:12	472:5	414:11
472:16 473:12,17	307:11,12 384:5	language 278:16	leaves 306:14
474:22 476:7,15 477:16	·	356:9 366:18	
Kerr's 287:11	KV/240 307:11	378:22 390:7,8,13	Lebel 280:7
	kw 369:25 370:3,5	391:3 430:18	led 266:17 279:19
key 267:1	kwh 374:8,9	laptop 397:3,8	left 397:12
Kim 267:1 402:17		large 262:11,12	legacy 338:25
410:24 411:7,14	L	300:20 305:3,4	legal 310:24
423:18	1 A N O E 040 45	333:23 406:25	311:16,18 320:8,
kind 247:15	L-A-N-G-E 243:15	408:17,24 451:13	10 321:14 382:22
248:25 252:4,5	L-I-H-E-A-P	largely 303:3	433:14,21 441:24,
254:18 255:4	259:25	326:3 419:23	25 442:4 447:6
260:10 261:3,7	L-U-E-B-B-E-R-T	larger 258:14	451:1
263:15 275:9 277:1 299:12,13,	427:16	362:5	legally 300:19
14,24 303:12	L.K. 243:15 292:7		legislation 332:18,
311:11 317:23		largest 334:12	19
331:12,20 340:21	labeled 273:14 277:10 324:21	late 305:1 322:16	_
341:13 347:15		421:21 475:22	legitimately 263:9
348:1,24 350:14	lack 360:18 389:8	477:18	lend 274:24
351:9 359:3	lacking 331:2	late-filed 325:9	length 349:11
389:20 393:5	lag 266:19,24	468:22 477:19	letter 427:16
395:20 396:14,16 402:12 415:25	267:1 358:21,22	latent 379:13	
418:11 430:19	454:25 456:2	law 281:11,15	letting 468:24
433:12 434:19	457:20	311:11 312:19	level 273:16,22
436:6 437:20	laid 276:5 279:24	313:5 319:23	279:5 282:10
440:25 446:20	314:6 317:25	344:25 350:5	283:7,17,22
452:2 455:11,19,	Lange 242:24	448:7,18	328:22 329:7
24 457:20 462:8	243:8,15 247:6	Lazar 279:20	338:18 345:10,13 351:21 357:3
kinds 478:12	272:18 277:6	280:8	358:13 372:9
	281:23 285:16	leader 351:10,16	418:14,15,17
king 347:14	292:7 304:3		420:9 424:18,19
kitten 336:15	316:18,25 318:8	leading 345:22	425:7,8 444:8
knew 282:18,25	337:5,12 345:2,6	leads 252:16	446:6 464:12
433:9	349:23 351:13 364:1,9 373:12	261:16	465:10
knowing 305:2	375:20 398:24	learn 326:25	levels 370:6
332:16 352:3,6	413:15,23 414:9,	learned 250:20,21,	371:17,18 388:3
knowledge 245:4	19 416:19 430:2,	24	Liberty 268:6,7
•	·		
	İ	1	I .

333:5 334:1,5 336:20,22 339:21 335:47,8 355:18, 399:19 402:9 408:20,23 408:20,24 408:20,23 407:4 454:22 407:4 454:22 409:19 405:5 457:23 306:19,20 323:3 464:16 336:25 400:21,24 445:17 446:20 LIHEAP 259:13,24 260:15 liking 310:22 locked 258:3 limited 347:25 439:18 limited 347:25 458:24 463:18,19 long-term 275:24 294:8 249:9.327:18 342:12 459:21 list 296:3 308:17 308:14 317:11,21 334:6 376:25 4248 426:24 455:7 475:12 476:11 listed 389:20 listened 362:4 listening 256:6 306:19 337:20 listened 362:4 listening 256:6 306:19 337:20 2 308:19 207:40:40:40:40:441:19 346:20 litigated 259:16,17 269:11 load 266:15 lidigated 259:16,17 269:14 load 269:14 lo			Evidentiai	ry nearing January	31, 2024index. lightmagic
limits 316:13 lines 275:14 331:8 378:19 440:19 459:8 longer 244:8 249:9 327:18 342:12 459:21 lower 308:14 358:9 354:19 357:15 359:18 368:24 359:18 368:24 359:18 368:24 359:18 368:24 359:18 368:24 359:18 368:24 359:18 368:24 359:18 368:24 359:18 368:24 369:11 347:20 421:17 426:14,19 427:1, 9,16 429:2 433:9 434:15 448:9 454:3,13 467:4 476:17 Luebbert's 442:7	338:: 340: 408:: light 380:: 445: LIHEA 260: liking limita limite	20,22 339:21 13 394:20,24 20,23 305:2 336:10 25 400:21,24 17 446:20 AP 259:13,24 15 310:22 tions 276:24 ed 347:25	335:4,7,8 353:18, 20 354:4 376:11, 12 401:9 402:6 407:4 454:22 459:10,16 loads 370:24 375:7 local 468:2 locked 258:3 long 249:3,4 275:10 304:3 433:6 440:1 457:2	397:9 402:9 405:12 409:16 437:22 439:19,22 440:24 441:19 453:5 457:23 464:16 lots 304:12 348:19 383:14 love 289:4 310:2 473:21 low 314:13 360:3 389:9 403:17,24	284:7,10 290:7 298:22 305:10 306:19,20 323:3 327:11 328:22 335:25 336:3 338:5,7 341:23 342:7 345:9,10 346:23 347:19 348:9 349:7 369:6 374:2 386:9 387:3,6 388:21 390:17,19 395:13 409:7 473:16
Isted 389:20 Ioss 374:9	lines 378: 459: link 3 list 2: 320:: 363: 376::	275:14 331:8 19 440:19 8 339:2 96:3 308:17 23 325:2,22 13 367:13 25 424:8	long-term 275:24 294:8,9 longer 244:8 249:9 327:18 342:12 459:21 looked 252:19,25 254:1 263:18 317:11,21 334:6	260:1 lower 308:14 358:9 LPS 342:14 Luckily 351:6 Luebbert 310:1 347:20 421:17	254:16 261:24 271:16 309:18 312:23 347:6 354:19 357:15 359:18 368:24 388:18 390:19 419:24 422:15 469:13 472:21,24
lists 475:5 literal 250:3 264:13,21 338:23 264:13,21 338:23 259:20 262:10 273:23 274:3 264:13,21 338:23 264:13,21 338:23 294:1 299:15 355:18 365:14 381:1 384:5,7 391:17 396:9 literally 290:7 340:11 341:1 346:20 litigated 259:16,17 269:11 local 266:15 literally 290:7 384:7 391:24 litigated 259:16,17 269:11 local 266:15 local 298:13 313:23 317:9 359:25 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 366:19 348:18 36	475: listed listen listen	12 476:11 389:20 ed 362:4 ing 256:6	loss 374:9 losses 374:3,4,19 lost 284:11	434:15 448:9 454:3,13 467:4 476:17	made 246:9 257:9 259:7 264:12 274:15 282:15
	lists 264: 355: 381: 391: literal 340: 346: litigat 269:	475:5 1 250:3 13,21 338:23 18 365:14 1 384:5,7 17 396:9 Ily 290:7 11 341:1 20 ted 259:16,17 11	259:20 262:10 273:23 274:3 282:21 287:3 294:1 299:15 304:10 306:5,18, 19 307:20,22 308:19 322:9,10 329:23 331:23 342:21 347:12 360:6,9,12 361:9, 12,20 362:1 365:2 366:20 372:14 375:19 382:8	298:13 313:23 317:9 359:25 360:15 385:12 lumping 283:24 lunch 337:11 344:23 372:21 373:3 376:20 394:22 Lutz 246:25 247:10 252:15 253:14,19 262:16 263:2 264:12	296:12 313:13 315:12,15 324:15 325:15 343:20 348:18 366:19 392:12 398:1 400:18 413:7 418:14 422:3,11 423:17 428:18 432:9 452:25 460:8 464:21 469:10 470:10 472:19 475:2 magic 246:18

	Evidentia	ry H
mailing 477:24	350:18 352:21	m
maintain 470:4 473:2	354:16 387:24 421:4 444:14	m
_	445:8 449:2,7,11,	m
maintaining 473:8	17	
maintenance	manage 401:17	
355:2	444:18 445:3	m
major 337:12	management	m
make 244:11,18	445:11	3
245:19 246:1	manager 427:21	
247:3,4 248:19	429:2 451:2	
265:5 270:6,17 284:22 291:1	managing 444:25	m
295:6 299:11	446:6	m
327:2 332:6 337:2	manhours 467:22	3
342:25 350:13	manner 284:4	m
352:19,22 353:22	317:23 368:21	3
354:24 355:20 367:22 375:24	386:11 434:10	
382:18 387:6,16,	435:12	m 3
18 388:11,21	Mantle 375:3	
398:4,7 400:2	manual 280:1	m
406:13,16 407:14	map 452:21	m
409:12,22 410:11 412:1,16 414:6,	Marc 280:7	m
24,25 418:13		М
421:2 426:24	March 478:11	3
428:3 433:13	mark 272:11 277:3	М
444:23 445:19,22,	325:1 384:16	m
25 448:20 449:2, 10,14 450:24,25	Marke 334:14	
451:1,14 452:1	475:13	m
455:22 456:20	Marke's 244:6	2
463:24 464:16,17	245:11,20 330:23 476:2	2
465:8 467:25		3
468:3 471:13 473:10 474:1	marked 243:23 244:1 247:1	m
475:5 478:9	272:13 277:4	3
makes 258:4	285:9 295:5 324:6	_
274:3 301:6	399:23,24 411:22	m
343:14 446:7	422:2 427:24	М
464:15	476:24 477:13	4
making 268:13	market 325:19	m
281:10 311:24	marketplace	m
337:21 349:21	343:22	
		l

	<u> </u>
markets 375:1	memory 413:20
material 340:10 math 271:13 272:2 341:7 357:11 397:13	mentioned 305:18 307:14 345:24 356:13 366:1 394:19 395:2 460:14 475:20
matrix 361:21	merited 308:12
matter 307:20,25 328:8 358:14 361:24 471:12 476:9	merits 278:14 mess 342:25 352:18,20
meaning 378:24	message 470:1
meaningful 323:9 333:19 means 309:6 356:6 358:12	met 322:20 meter 257:15 263:25 264:14,17 396:8,14,16,22
434:24 463:25	410:7
meant 261:11 364:24 458:8	metered 256:17, 19 257:5,6,12 258:12 341:5,7
measure 370:23 measured 257:8 measuring 370:21 MECG 269:17	metering 256:16 265:16 396:5 410:14 420:3 460:3
310:5 389:16 MEEIA 339:9 meet 321:24	meters 278:25 314:8 317:13 360:2 384:2 396:6,10 459:21
meeting 285:23 286:4,14 288:8 289:4,12,20 290:18,20 291:7 323:13,14 373:6	method 403:25 methodology 336:4 methods 408:4
meetings 286:3 349:4 372:14,15, 17,20 373:13 meets 394:12	Metro 262:14,17, 25 295:10 360:9 363:5 365:15 370:9 391:13,22 392:2,8,14
MEIAA 368:15 418:16 456:10 member 382:2 members 293:19	Metro's 360:7 361:7 MGS 329:3,4 342:14

	Evidentia	ry Hearing January 31	, 2024Index: Michaelmov
Michael 267:2	minutes 261:21	mix 341:11	monthly 455:2,4
399:9,16 424:24	262:14,15,17	madal 226:20	456:13,23 457:8
	263:1 344:17	model 336:20	·
microphone	370:1,2,4 394:15	374:22,23 375:13	months 253:17
349:24	467:11 478:18	modeling 350:24	261:2 266:13,21
middle 316:22		375:6	348:23 353:9,10,
345:1 357:21	mis-numbered		11 354:2 409:19
	477:4	modernization	454:25 457:13,18
midst 335:6 345:2	mischaracterizatio	275:18 276:4	458:10,11 464:17
Midwestern 403:9,	n 432:24	278:19 279:16	467:19
16		284:19,23,24	moot 256:8,11
	miscommunicatio	286:3 287:2	
migration 401:19,	n 316:12,21	289:14 291:9,10,	mooted 256:21
23	miscommunicatio	12 293:15 294:5	morning 242:17
mile 331:14 384:4	ns 468:17	321:25 322:18	243:6,7 246:12
	113 400.17	323:2,8 372:22	247:6,7 252:19
miles 252:1 303:5,	misheard 468:18	430:3 432:11,18,	281:22,24 294:20
6 327:6,8 331:13	misinterpreting	22 452:18,19	,
357:4,7,9,10	438:3	453:16,20 475:9	325:11,12 345:25
million 296:7,14		·	356:1 383:25
298:6,23 317:9,	misplacing 470:12	modifications	405:18 469:13
10,17 360:1	misquoted 455:9	249:7 265:8,9	472:22
362:17 403:2,3	-	276:10	morphed 359:3
437:12,15	misread 471:14	modify 437:19	-
·	misremember		motion 246:4
millions 371:10	388:22	modifying 299:18	274:9 308:24
403:4		moment 256:4	311:10 324:9,20
mind 259:19	missed 395:14	264:3 271:24	325:8 400:14
264:24 303:3	439:24 466:6	273:3 274:21	413:4 422:3,4
341:10 357:8	Missouri 243:19	323:25 378:9	428:15 469:2
360:5 361:9	266:13,17 268:2	478:4	472:10 473:2,5,
379:12 381:23	279:19,21 287:19		11,12,14,15,22,25
382:23 384:16	288:5 295:10,11	money 251:19	474:3,14,21 477:5
396:2 415:1 426:9	335:3 351:10	296:20 298:4,9	motions 310:21
466:10 474:23	372:3 399:19	301:2,10 332:16	371:7 478:13
400.10 474.23	411:17 427:19	467:23	
mine 274:25		monitoring 417:17	move 242:19
294:23	misspoke 394:22		251:9 259:3
minimal 344:6	mistake 392:12	month 335:14	261:8,10 263:10
		352:14 354:2	271:12 272:22
minimis 389:25	mistaken 286:25	393:18,19,20	274:6,23 284:13
390:23	misunderstanding	394:3,16 406:25	287:8,9 292:22
minimize 387:15	339:16 406:15	416:14,16,22,23	323:24 324:6
		423:22 424:13,15	388:13 390:17
minimum 333:15	misunderstood	426:1,3,5 456:13	398:4 400:22
401:13	286:10	458:3,4 463:18,	412:8 423:18
minute 259:24	mitigate 266:19	19,23,25 464:16	446:11 452:18
291:20 343:12		467:19	453:25
365:9 393:16	mitigating 267:1		
JUJ.3 J3J. 10			
	I	1	1

necessarily nonresidential 295:4 297:14 14 385:23 397:25 necessarily 304:13 330:16 333:23 339:25 344:21 325:2,4 328:11 330:5 340:5 433:4,13 440:7,15 361:19 393:19 396:4 431:8 444:12 448:19 445:12 404:6,8,25 366:19 391:11 447:2,4 448:8 445:12 457:8 433:10 350:23 399:25 411:24 472:14 473:14 needed 341:13,24, 25 342:1 362:23 351:11,14 401:9 402:14,18,22,24 472:14 473:14 474:13,18		Evidentia	ry Hearing January 31, 20	24Index: movedobjection:
moving 249:23 273:20 353:3.4,5 414:13 442:22 443:18 458:9 MRCC 405:3 multi- jurisdictional 360:10 multiple 422:10,22 455:17 multiplied 373:19 multipley 273:21 357:10 munis 394:9 mutually 271:13 NE-R-C 370:19 narrowed 436:6 national 351:10,13 nature 281:5 305:7 NCP 262:66,7,24 303:9,10,20 necessarily 304:13 330:16 303:23 339:25 340:18 352:17 361:19 393:19 304:13 330:16 303:23 339:25 340:18 352:17 366:12 457:8 needed 341:13,24, 25 342:1 366:23 371:4 376:15 379:10 432:21 normalized 351:21 407:22 normals 351:15 405:2 norde 419:24 note 242:14 475:14 477:8 note 242:14 475:14 477:8 note 242:14 475:14 477:8 note 372:19 0 object 320:7 381:13 382:21 319:16 noricic 253:20 319:16 10 417:20 Notwithstanding 275:25 November 254:1 NSI 351:21 368:15 376:6 395:23 376:6 395:23 376:6, 8 395:5,6 420:3 normalized 351:21 407:22 normals 351:15 405:23 noted 419:24 notes 372:19 0 object 320:7 381:13 382:21 431:17 440:25 447:22 452:17 Notwithstanding 275:25 November 254:1 NSI 351:21 368:15 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:24 noted 419:24 note 242:14 475:14 477:8 noted 419:24 note 242:14 475:14 477:8 noted 419:24 note 372:19 Notwithstanding 275:25 November 254:1 NSI 351:21 368:15 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:24 319:16 NSI 351:21 368:15 376:6 395:23 376:6 395:23 376:6 395:24 319:16 NSI 351:12 368:15 376:6 395:23 376:6 395:23 376:6 395:24 147:22 442:14 477:14 298:22 317:19 325:24 388:11 325:14 407:22 306:19 00 object 320:7 381:13 362:21 305:7 381:13 382:21 431:17 440:25 441:22 445:13 376:6 8 395:24 142:12 345:13 332:14 367:3 332:14 367:3 332:14 362:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:23 376:6 395:	moved 397:18,23	negative 368:7		numbering 325:3
273:20 353:3.4,5 414:13 442:22 443:18 458:9 MRCC 405:3 multi- jurisdictional 360:10 multiple 422:10,22 455:17 multiplied 373:19 multiple 373:19 multiple 273:21 357:10 munis 394:9 mutually 271:13 N-E-R-C 370:19 narrowed 436:6 national 351:10,13 nature 281:5 305:7 NCP 262:6,7,24 393:9,10,20 necessarily 304:13 330:16 333:23 339:25 340:18 352:17 306:14 362:23 needed 341:13,24, 25 342:1 366:12 37:14 366:12 37:14 406:12 normalized 351:21 407:22 357:10 normalized 351:21 407:22 357:10 normals 351:15 405:3 note 242:14 475:14 477:8 note 419:24 notes 372:19 0 object 320:7 381:13 382:21 477:24 noriced 349:10 447:22 0 447:22 452:17 Notwithstanding 275:25 November 254:1 NSI 351:21 368:15 376:6 395:2,3 notice 253:20 319:16 0 object 320:7 381:13 382:21 447:22 423:10 450:6 0bjected 308:7 380:15 397:24 423:10 450:6 0bjection 245:25 290:4 292:20 305:25 310:24 477:24 173:14 440:19 456:12 457:8 173:14 406:12 174:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:8 175:14 477:14 175:14 477:12 175:14 473:14 474:6 175:14 477:14 175:14 477:12 175:14 473:14 474:6 175:14 477:14 175:14 477:14 175:14 477:14 175:14 477:14 175:14 477:14 175:14 477:14 175:14 477:12 175:14 477:14 175:14 477:12 175:14 476:15 175:14 4	movement 397:18	NERC 370:18	1	,
MRCC 405:3 multi-jurisdictional 360:10 nice 336:1 370:21 h0b:3 normals 351:15 h05:3 numerically 359:11 numerically 359:11 numerically 359:11 numerous 308:9, 22 multiple 422:10,22 455:17 multiple 373:19 multiply 273:21 357:10 nod 245:19 non-answer 250:20 319:16 notice 253:20 319:16 non-coincident 262:8,11 non-coincident 262:8,11 non-coincident 262:8,11 numerous 308:9, 22 non-ces 372:19 notice 253:20 319:16 notice 253:20 319:16 notice 349:10 417:20 h0b:21 for 341:17 440:25 h0b:22 for 341:13 882:21 h0b:22 for 342:13 882:13 and 476:16 homo-inistoric 327:18 noncoincident 341:20 393:10,12 noncoincident 341:20 393:10,12 noncoincidential 288:3 323:11 noncoincidential 288:	273:20 353:3,4,5 414:13 442:22	376:6,8 395:5,6 420:3	352:1 375:12 normalized	307:16 327:18 332:14 363:7 364:10,16 366:19
multi-jurisdictional 360:10 Micholas 396:24 409:2 405:3 note 242:14 477:8 noted 419:24 notes 372:19 426:23 O multiple 422:10,22 455:17 non-answer 250:20 non-case 455:2,4 non-case 455:2,4 non-case 455:2,4 non-coincident 262:8,11 non-coincident 262:8,11 non-coincident 347:20 sys:10 s	MRCC 405:3		normals 351:15	
multiple 422:10,22	multi- jurisdictional 360:10	Nicholas 396:24 409:2	405:3 note 242:14	359:11 numerous 308:9,
multiplied 373:19 nod 245:19 426:23 multiply 273:21 non-answer 250:20 319:16 381:13 382:21 munis 394:9 non-case 455:2,4 noticed 349:10 441:23 445:13 mutually 271:13 non-coincident 262:8,11 Notwithstanding 476:6 objected 308:15 397:24 N-E-R-C 370:19 non-historic NSI 351:21 368:15 397:24 national 351:10,13 noncoincident 341:20 393:10,12 nomofidential 275:19 280:2 390:4 290:4 292:20 NCP 262:6,7,24 393:9,10,20 noncesidential 288:3 323:11 305:5 305:7 noncesidential 288:3 323:11 305:5 342:19 380:15 31:15 31:15 31:15 31:15 31:15 31:15 31:15 31:15 31:15 31:15 31:15 31:15 31:15 31:15 31:15 31:15 31:15<	• ′			
N	multiplied 373:19	nod 245:19		
nunis 394:9 non-case 455:2,4 noticed 349:10 441:23 445:13 447:22 452:17 474:6 N non-confidential A76:16 November 254:1 Nobiected 308:15 397:24 423:10 450:6 objected 308:7 380:15 397:24 423:10 450:6 objection 245:25 290:4 292:20 305:25 310:24 423:10 450:6 objection 245:25 290:4 292:20 305:25 310:24 423:10 450:6 objection 245:25 290:4 292:20 305:25 310:24 305:25 310:24 305:25 310:24 305:25 310:24 305:25 310:24 305:25 310:24 423:10 450:6 objection 245:25 290:4 292:20 305:25 310:24 305:25 310:24 311:15 312:2 325:19 380:2 285:11 291:22 295:4 297:14 298:22 317:19 381:22 384:10,12 381:22 384:10,12 381:22 384:10,12 412:12 423:4,13 430:5 432:7 433:4,13 440:7,15 441:21,14 443:1 447:22 452:17 428:23 442:23 447:26 429:12,25 429:14 429:22,24 325:2,4 328:11 330:5 340:5 341:21 23:10 350:23 342:19 358:6 342:19 358:6 36				381:13 382:21
N	munis 394:9	non-case 455:2,4		
N-E-R-C 370:19 narrowed 436:6 national 351:10,13 nature 281:5 305:7 NCP 262:6,7,24 393:9,10,20 necessarily 304:13 330:16 333:23 339:25 340:18 352:17 361:19 393:19 396:4 431:8 444:12 448:19 456:12 457:8 needed 341:13,24, 25 342:1 362:23 37:14 376:15 37:10 432:21 Non-historic 327:18 non-historic 327:18 non-historic 327:18 noncoincident 341:20 393:10,12 nonconfidential 341:20 393:10,12 256:15,16 267:15 256:15,16 267:15 275:19 280:2 285:11 291:22 295:4 297:14 298:22 317:19 325:2,4 328:11 330:5 340:5 342:19 358:6 364:19,21 365:8 372:16 373:12,13 386:19 391:11 392:10 396:7,10 399:25 411:24 477:14 380:15 397:24 423:10 450:6 objection 245:25 290:4 292:20 305:25 310:24 311:15 312:2 321:9,13 322:2,8 381:22 384:10,12, 414:39:39:11 438:15 397:24 423:10 450:6 objection 245:25 290:4 292:20 305:25 310:24 311:15 312:2 321:9,13 322:2,8 381:22 384:10,12, 438:10 350:23 380:15 397:24 423:10 450:6 objection 245:25 290:4 292:20 305:25 310:24 311:15 312:2 321:9,13 322:2,8 381:22 384:10,12,2 414:385:23 397:25 412:12 423:4,13 430:5 432:7 433:4,13 440:7,15 444:19 445:12,17 447:2,4 448:8 449:21,25 450:23 452:8,10 469:6,7, 23 470:4,17 472:14 473:14 474:13,18 objections 242:19	mutually 271:13		Notwithstanding	
N-E-R-C 370:19 non-historic NSI 351:21 368:15 423:10 450:6 national 351:10,13 noncoincident 341:20 393:10,12 number 248:1 290:4 292:20 305:25 310:24 311:15 312:2 305:25 310:24 311:15 312:2 305:25 310:24 311:15 312:2 305:25 310:24 311:15 312:2 305:25 310:24 311:15 312:2 305:25 310:24 311:15 312:2 305:25 310:24 311:15 312:2 305:25 310:24 311:15 312:2 305:25 310:24 311:15 312:2 305:25 310:24 311:15 312:2 305:25 310:24 311:15 312:2 329:4 292:10 305:25 310:24 311:15 312:2 329:4 297:14 311:15 312:2 329:42:28 317:19 438:23 339:25 441:11 443:13 430:5 432:10 432:10 442:11 443:13 440:7,15 441:1,1	N			_
405.1,4 400.12 numbered 260.23 240.0 274.0,12	natrowed 436:6 national 351:10,13 nature 281:5 305:7 NCP 262:6,7,24 393:9,10,20 necessarily 304:13 330:16 333:23 339:25 340:18 352:17 361:19 393:19 396:4 431:8 444:12 448:19 456:12 457:8 needed 341:13,24, 25 342:1 362:23 371:4 376:15	327:18 noncoincident 341:20 393:10,12 nonconfidential 477:24 nonresidential 288:3 323:11 noon 337:10 344:21 normal 283:17 403:12 404:6,8,25 405:2,5,6 406:18 normalization 343:10 350:23 351:11,14 401:9 402:14,18,22,24 404:10,18,23	376:6 395:2,3 number 248:1 256:15,16 267:15 275:19 280:2 285:11 291:22 295:4 297:14 298:22 317:19 325:2,4 328:11 330:5 340:5 342:19 358:6 364:19,21 365:8 372:16 373:12,13 386:19 391:11 392:10 396:7,10 399:25 411:24 417:20,21,23 437:13 440:23 458:16 469:4	objection 245:25 290:4 292:20 305:25 310:24 311:15 312:2 321:9,13 322:2,8 381:22 384:10,12, 14 385:23 397:25 412:12 423:4,13 430:5 432:7 433:4,13 440:7,15 441:1,14 443:1 444:19 445:12,17 447:2,4 448:8 449:21,25 450:23 452:8,10 469:6,7, 23 470:4,17 472:14 473:14 474:13,18 objections 242:19
		· · · · · · · · · · · · · · · · · · ·	numbered 260:23	· · · · · · · · · · · · · · · · · · ·

	Lvideritia	Ty Hearing January 31, 202	4index. objectiveoverruit
400:15 412:6	offer 245:6 400:12	414:4 436:18	356:11 432:13
413:4 428:15	413:1 428:12	442:8,23 444:2	436:9,11 478:2
440:17,23 453:5	472:7	446:16 467:15	ordering 279:14
461:17 468:23,24	offered 278:9	471:12,14	ordering 279.14
469:3,17 472:23	295:2 386:9	opportunitios	orders 281:3
abiaatiya 200:5.0	426:25 470:15	opportunities 276:16 277:17	293:8 300:18,19
objective 300:5,9	420.23 470.13	270.10 277.17	332:7 342:10
446:15,18	offering 380:15	opportunity	369:14 449:20
objectives 429:3,	Office 301:14	278:16 305:17	450:18,20
5,9 451:4	355:8	312:13 343:11	organic 300:13
obligation 350:5		349:12 469:14	
•	on-peak 269:17	opposed 402:7	organization
observation 364:9	288:10,13		305:3
observes 248:25	one-hour 370:16	opposite 342:22	original 423:4
obtain 352:25	one time 254:12	413:22	474:3
	one-time 354:13	opposition 472:9	
391:8 405:3	OPC 272:19 310:5		originally 423:10
437:20 438:5	323:24 324:6	optimistic 317:7	425:10
obtained 403:12,	330:23 334:14	option 368:7	originates 252:20
16	389:17 473:22	379:5 466:24,25	ostensibly 361:11
obvious 281:7	474:2,4 475:12,19	options 288:9	
396:2,12	OPC'S 274:14	348:12	outcome 345:15
·	324:14		outlined 275:18
occasionally		order 253:25	278:20 288:9
452:12	open 276:9 279:14	257:10 269:16,22,	389:20
occur 289:8 339:8	297:22 302:16	25 270:1,9,12,14	0.14m.14 200.21
347:25 438:10	306:14 309:14,23	298:6,16,21	output 390:21
463:22	310:12,13,20	303:22 311:14	outstanding
occurred 254:14	313:3 340:21	312:5,7,9,11	298:11 415:2
276:9 290:24	347:17 348:20	318:10 319:17,18	overhead 303:5
323:5 345:25	386:12 390:11	321:8 324:1 331:7	314:24 326:6
	open-ended 310:9	332:4 341:8,9,18	371:17,19 384:4
355:23,24 366:16 394:1 418:1	opened 322:7	350:2 355:15,18	,
432:12 459:12	·	356:11 402:25	overhear 242:16
	opening 256:6	406:7,12 407:15	overlap 346:4
occurrence 313:4	275:22 444:23	422:19 424:23	overlay 269:19
occurring 346:12	operate 252:2	425:5,11 432:13, 18 437:16 438:6	
457:25	303:6,7 357:4	441:18 443:19	overrule 433:4
occurs 251:1	384:4	445:21 450:16,22	overruled 290:5
327:25 367:16	operates 331:13	451:7,12 454:21	306:3 312:3
	_	458:4 463:14	319:12 322:8
October 253:25	operating 303:11,	465:18 466:25	398:23 440:15
254:5 319:19	12 313:17 357:7	476:25 477:2,20	472:14 473:4
odd 259:4	operations 283:17		
	_ ·	ordered 269:13,24	
offense 305:9	opinion 250:9	281:2 293:1 300:8	
	312:19 361:5,7	332:9 355:12,19	

Р
p.m. 408:15,16
pages 275:14 324:10,20 359:4,5 375:2 470:19
paper 317:5 326:7,
papers 297:2 308:10 317:19 328:15 332:13 360:19
paragraph 277:13, 14,25 278:8 318:25 320:11,16
parameters 435:4
paraphrase 271:4 443:19 465:21
paraphrasing 378:1
pardon 466:5
part 246:9 253:6 258:3 271:10 274:15 275:19 276:5,19 278:22 279:16 280:15 281:13 287:15 324:15 335:1 347:12 350:18 371:11 387:14 390:16 400:18 413:7 423:17 427:20 428:18 430:18,19 431:21, 23 440:22 441:9 442:21 444:11 459:25 467:12 469:10 470:10,21 472:19 474:18 475:2

p.m. 408:15,16 pages 275:14 324:10,20 359:4,5 375:2 470:19 paper 317:5 326:7, 9 papers 297:2 308:10 317:19 328:15 332:13 360:19 paragraph 277:13, 14,25 278:8 318:25 320:11,16 parameters 435:4 paraphrase 271:4 443:19 465:21 paraphrasing 378:1 pardon 466:5 part 246:9 253:6 258:3 271:10 274:15 275:19 276:5,19 278:22 279:16 280:15 281:13 287:15 324:15 335:1 347:12 350:18 371:11 387:14 390:16 400:18 413:7 423:17 427:20 428:18 430:18,19 431:21, 23 440:22 441:9
324:10,20 359:4,5 375:2 470:19 paper 317:5 326:7, 9 papers 297:2 308:10 317:19 328:15 332:13 360:19 paragraph 277:13, 14,25 278:8 318:25 320:11,16 parameters 435:4 paraphrase 271:4 443:19 465:21 paraphrasing 378:1 pardon 466:5 part 246:9 253:6 258:3 271:10 274:15 275:19 276:5,19 278:22 279:16 280:15 281:13 287:15 324:15 335:1 347:12 350:18 371:11 387:14 390:16 400:18 413:7 423:17 427:20 428:18 430:18,19 431:21,
papers 297:2 308:10 317:19 328:15 332:13 360:19 paragraph 277:13, 14,25 278:8 318:25 320:11,16 parameters 435:4 paraphrase 271:4 443:19 465:21 paraphrasing 378:1 pardon 466:5 part 246:9 253:6 258:3 271:10 274:15 275:19 276:5,19 278:22 279:16 280:15 281:13 287:15 324:15 335:1 347:12 350:18 371:11 387:14 390:16 400:18 413:7 423:17 427:20 428:18 430:18,19 431:21,
308:10 317:19 328:15 332:13 360:19 paragraph 277:13, 14,25 278:8 318:25 320:11,16 parameters 435:4 paraphrase 271:4 443:19 465:21 paraphrasing 378:1 pardon 466:5 part 246:9 253:6 258:3 271:10 274:15 275:19 276:5,19 278:22 279:16 280:15 281:13 287:15 324:15 335:1 347:12 350:18 371:11 387:14 390:16 400:18 413:7 423:17 427:20 428:18 430:18,19 431:21,
14,25 278:8 318:25 320:11,16 parameters 435:4 paraphrase 271:4 443:19 465:21 paraphrasing 378:1 pardon 466:5 part 246:9 253:6 258:3 271:10 274:15 275:19 276:5,19 278:22 279:16 280:15 281:13 287:15 324:15 335:1 347:12 350:18 371:11 387:14 390:16 400:18 413:7 423:17 427:20 428:18 430:18,19 431:21,
paraphrase 271:4 443:19 465:21 paraphrasing 378:1 pardon 466:5 part 246:9 253:6 258:3 271:10 274:15 275:19 276:5,19 278:22 279:16 280:15 281:13 287:15 324:15 335:1 347:12 350:18 371:11 387:14 390:16 400:18 413:7 423:17 427:20 428:18 430:18,19 431:21,
443:19 465:21 paraphrasing 378:1 pardon 466:5 part 246:9 253:6 258:3 271:10 274:15 275:19 276:5,19 278:22 279:16 280:15 281:13 287:15 324:15 335:1 347:12 350:18 371:11 387:14 390:16 400:18 413:7 423:17 427:20 428:18 430:18,19 431:21,
378:1 pardon 466:5 part 246:9 253:6 258:3 271:10 274:15 275:19 276:5,19 278:22 279:16 280:15 281:13 287:15 324:15 335:1 347:12 350:18 371:11 387:14 390:16 400:18 413:7 423:17 427:20 428:18 430:18,19 431:21,
part 246:9 253:6 258:3 271:10 274:15 275:19 276:5,19 278:22 279:16 280:15 281:13 287:15 324:15 335:1 347:12 350:18 371:11 387:14 390:16 400:18 413:7 423:17 427:20 428:18 430:18,19 431:21,
258:3 271:10 274:15 275:19 276:5,19 278:22 279:16 280:15 281:13 287:15 324:15 335:1 347:12 350:18 371:11 387:14 390:16 400:18 413:7 423:17 427:20 428:18 430:18,19 431:21,
442:21 444:11 459:25 467:12 469:10 470:10,21 472:19 474:18 475:2
participants 288:13 312:13

Evidentiai
participate 367:10
participates 343:25
participation 375:1
parties 278:15 285:18 366:8 434:11 435:14 436:2 440:3 443:11 452:13 468:4 475:25 476:8 478:12,13
parties' 475:4
partner 272:25 273:3,16,22
parts 294:2 328:25
party 249:6 423:7 434:11,24 435:3, 13 436:15 471:8 476:2
party's 264:10 426:23
passed 394:6
past 250:11,13 257:24 258:24 269:14 278:18 280:19 300:24 333:22 346:15 390:17 402:4,5,13 406:6 437:1 450:22 458:21 461:16 462:18
path 288:4 296:21 297:13 298:5 301:18 302:11 452:2,21 468:5,10
pathway 265:6
patience 421:22
pause 334:22 335:4 337:7 344:16 470:18

, riouring carracity c	71, 202 midoxi piimii
478:8	period 253:10
pay 329:3	254:4 266:15,2
paying 248:9	270:24 333:19
343:3 361:14	353:18,25 354
	375:14 394:11 401:15 410:23
peak 261:21	416:10 426:13
262:8,11 269:12, 14,18 270:20	455:19 456:3,5
341:21 368:25	458:6,12 463:6
369:10,11 370:2,	464:9,18
4,8,9,10 393:10,	periods 266:16
11,12,24,25	270:22,24 339
394:2,14 397:5	457:9,22
405:16 417:22	Permission
peaks 351:21	246:20
370:15,16,25	 person 326:11
pejorative 382:6	327:4 332:6
penalties 319:22	335:11 343:8
-	personal 222:1
pending 318:8	personal 322:2 468:11 471:14
319:10 468:20,21	
people 305:9	personally 322 344:2 356:18
356:4 407:8	358:6,9
409:18 429:11	,
perceive 386:3	personnel 307 326:13 335:10
percent 257:12,21	
333:17 341:2	perspective 27 289:7 300:4
343:2 374:7 406:2	322:20 448:3,
percentage	
342:13 368:3	persuaded 474
perfect 421:15	pertinent 391:
perform 255:11	phase 249:5
266:25 309:9,15	312:5,7
326:19 355:22	phonetic 338:2
367:1 368:1	phrase 303:10
378:14 434:25 435:3 440:4	331:6 346:9 46
	phrased 378:1
performed 434:16 440:6	, physics 405:19
performing	pick 338:4 458
250:13 327:5	picked 335:5
performs 303:2	·
	picking 342:5

254:4 266:15,21 270:24 333:19 353:18,25 354:1,4 375:14 394:11,12 401:15 410:23 416:10 426:13 455:19 456:3,5,6 458:6,12 463:6,17 464:9,18 periods 266:16,18
270:22,24 339:10 457:9,22
Permission 246:20
person 326:11 327:4 332:6 335:11 343:8
personal 322:20 468:11 471:14
personally 322:22 344:2 356:18 358:6,9
personnel 307:3 326:13 335:10
perspective 272:6 289:7 300:4 322:20 448:3,14
persuaded 474:20
pertinent 391:16
phase 249:5 312:5,7
phonetic 338:24
phrase 303:10 331:6 346:9 463:3
phrased 378:17
physics 405:15
pick 338:4 458:15
picked 335:5
picking 342:5
tion #116FAttachment 4

		,	aca. procomprocomanion
358:6	17,18 347:7	309:19 310:4	predominantly
piece 326:16	348:20 356:8	311:12,23 330:7	277:22 279:11
pieces 342:4	375:19 378:25 383:6 395:11,12	344:11 353:7 356:18 385:10,11	preface 371:5
_	397:9 417:24	386:5 399:18	prefer 272:23
PISA 332:18 371:13	422:23 423:3	411:16 427:18	322:7 413:14
	430:2,10,17,23	436:16,24 437:10,	preference 471:6
place 248:2 403:13 438:13	431:5 433:5 438:5	14 438:3 450:22	•
459:21 463:16	444:23 445:19	positions 464:14	preferential 250:2 264:23 350:4
465:13	446:5 455:10 470:6 473:3	positive 399:25	
places 260:16		•	preferred 270:24 331:21
-	pointing 259:5	possibility 258:5, 8,9,13	
plan 249:9 275:18, 24 276:4 279:16	319:9 328:24		prefiled 301:13
391:7 425:4	poker 401:25	possibly 284:3 296:16 332:25	prejudicial 423:6,
453:17	409:11	347:20 366:8	7 471:9
plans 332:19	pole 346:17	421:2 478:22	premarked 243:23
337:19 389:11	371:23	potential 297:23	359:10
404:11,19	poles 305:17	302:17 306:15	premise 255:5
plant 282:9 283:6,	315:1 371:20,21,	316:12 339:16	prepare 354:21,23
12,16 308:9,11,	22 384:4	462:7	429:23 445:24
19,20 314:21	policies 280:15	potentially 251:12	447:11
327:13 332:3,18	300:17 449:19 450:9 451:6	341:15 345:11	prepared 243:21
360:3 361:12 371:3,18 374:24		352:4 388:13	320:5 373:10
379:9 380:12	policy 276:3 278:10,19 280:18	power 285:17,24	399:21 411:19 427:22 475:21
	300:8 301:1,3,5,9	286:11,16 288:4	_
plausibility 251:23	429:3,5 430:15	289:21 291:15	prepares 305:14
play 250:6 342:5	449:22 450:12,13	293:16,17,25 294:5 333:23	preparing 293:22
played 471:18	poor 467:18,21	374:24 376:10	294:4
plug 351:13	portion 327:24	380:25 430:1,9,17	prepay 373:2
point 242:12,18	328:7 401:13	465:16	prescribe 465:16,
255:22 258:22,25	453:21 471:22	practical 289:11	18
270:22 271:10	472:4	practices 300:24	presence 424:2
279:1 284:9	portions 359:1	446:3	present 291:11
285:17,24 286:11, 16,20 288:4	posed 273:8	prays 319:14,16	448:4,15
289:21 290:24	413:23 452:24	preannounced	presentation
291:15 293:16,17,	position 243:17,	344:18	285:4,5,6,17
25 294:6 298:11	18 247:16 251:16,	preceded 470:21	288:12 289:13
305:9 306:9	17,25 258:21	•	293:3 295:2
320:10 322:8	260:9 265:21	precisely 403:15 404:3 409:13	322:11 373:3,8,11
323:15,21 329:5 331:21 333:14	293:6 294:17		395:24 396:1 430:2,10 475:9
340:24 342:6,10,	295:7,16,21 296:5 298:10 300:23	precision 329:7	700.2,10 770.3
, ,	200.10 000.20		

		, , ,	
presentations 280:6	price 248:11 264:20,23 272:25	probative 423:5,8 problem 251:13	produced 311:14 320:13 437:7
presented 284:22 285:17,23 289:21 291:10,13 292:6,	273:9,13,16 277:18 281:9,16 310:17 382:5 388:14	260:20 261:9,21 270:3 276:25 322:23 344:4,12	producing 299:12 437:4 438:15 454:4
7,14 293:18,19 328:5 351:13	priced 266:1	352:8 355:19 358:11 369:3	product 330:19
366:17 396:3 425:2 430:2 432:25 443:15	prices 266:5 271:4 303:17 381:6 pricing 289:17	471:5 problematic 462:1,6 464:11	production 299:3 309:8 350:23 374:21,23 375:6 390:22
presenting 439:1, 5 443:3 444:22 447:9	291:14 373:1 388:4 438:10	problems 267:7 procedural 253:24	productive 323:8 340:17 341:20 348:6 349:6
preserve 474:22	pride 279:22 primarily 248:20	254:6 458:1 proceed 297:25	388:23
preserving 473:20	302:8	380:20 453:1	professional
presiding 242:5	primary 252:11	proceeding	250:24
pressing 454:6	255:9 265:18 307:11 314:17,23	243:22 260:25 309:23 310:8,9	professionals 279:21 280:3,7
presubmitted 475:8 presumption	328:18 329:3,13 331:23 374:6	312:14 358:7,10 399:22 411:20 427:23 430:22	Program 260:2,6 279:12,18
387:5	388:17,20 415:25 printed 363:12	proceedings	programmer
presumptively 394:11	prior 259:12	242:1	454:6 programming
presuppose 453:4	300:19 304:23 312:16,21 345:13,	proceeds 297:24 302:18	259:21
presupposing 452:25	19,23 349:3 353:11 371:9	process 351:8 353:1 354:17	programs 260:12 289:17
pretend 369:22	453:8 472:5 477:2,13 478:14	357:13 371:13 389:11 404:23	progress 389:9
pretty 265:24 314:9 331:22	priorities 416:3	406:12 407:22,25	prohibitive 314:12 390:10 436:22
347:7 395:15 450:2	prioritization 371:14	409:9 processes 391:18	prohibits 434:11 435:13
previous 300:18	prioritize 248:16 308:12 336:18	processing 454:25	promised 375:17
334:13 416:18 446:7 449:20	360:2 393:4,5	Proctor 351:12	promote 278:10
450:9 451:7 470:13	priority 308:15 335:23 336:2	produce 296:7,9 298:16,21 299:24	promulgated 317:4
previously 275:17	privilege 433:25	314:22 318:11	proof 260:11
338:6 356:13		321:3 354:11	proper 408:13
399:24 422:2	privileged 346:2	437:9 440:13	
399:24 422:2 440:6 473:7 475:18 477:25	proactive 349:1	437:9 440:13 441:5,21 442:1,20 462:21	properly 358:17

		, , , , , , , , , , , , , , , , , , ,	124maex. propertyquestio
property 251:1,4,5	269:11 295:12	455:1,21 466:20	pursued 280:15
325:18,25 326:10,	297:17,25 300:12	provision 269:4	283:9 332:5
15,16 327:9,13	301:20 306:8,10	297:21 301:23	
331:1 332:3,9,10	309:7 313:22		pursuing 358:13
355:11,17 356:20	314:15,17 316:1	317:2,25 338:23	387:12 432:14
379:4,7,13	317:5,16 318:2	340:6 350:4	pursuit 296:3
313.4,1,13	328:15 331:18	359:24 435:7	386:7
proportionally		465:10	
409:15	334:7 338:9,11,18	provisions OFF.4	push 456:2
	339:3,5 341:12	provisions 255:1	pushback 306:5
proportionately	346:7 350:2	350:7,10 397:2	463:6
361:15	354:3,15 368:8,	PSC 243:19 336:6	463.6
proposal 288:6,18	13,14 382:2 385:2		pushed 307:23
289:9 291:10,12	386:19 389:19,22	public 246:4	
293:16 323:6	390:1,2,3,4,9,11,	274:1,11 278:10,	pushes 463:23
	14 391:1 397:4	19 280:18 299:18	pushing 468:23
413:24 451:25	399:3 408:20	300:16 355:8	
452:2 453:13,15	412:13 416:11	399:19 411:17	put 242:8,14
proposals 267:12		427:19 440:3	265:11,13 270:15
288:4 293:24	417:11,12 419:4	444:18 448:22	272:6 276:1 300:7
294:5 414:2	420:2 425:11	449:15 475:15	331:7,8 334:22
	426:2 435:24		335:4 350:1 374:7
432:22 439:11,14	436:12,20 440:25	476:12,13 477:20	418:4 438:15
442:24 443:3	441:2,12 443:8	pull 372:7 389:6	458:15 470:18
444:2	446:20 448:23		477:23
propose 340:1,19	458:3,5,22 464:14	pulled 439:21	
438:12 478:5	465:23 466:24	punitively 259:16	puts 375:5
proposed 253:24	provided 247:2	punt 245:11	putting 371:21
254:5 269:17,18	. 285:7 295:19	DUDDA 200,47.25	374:24 383:13
275:18 294:7	308:5 313:22	PURPA 280:17,25	PWC 272:25
339:25 442:25	315:25 316:7,9	336:10 368:22	PVVC 212.25
	•	purported 469:15	
444:3,13	340:3,7 341:13, 14,19 345:17	purporting 293:7	Q
proposes 444:6	346:21 348:1	purports 379:1	quantification
proposing 267:21	358:2 384:24	Duibbits 3/8.1	quantinoution
000 5 444 7 45			384:25
336:5 444:7,15	385:12 394:19	purpose 387:13,	
,	385:12 394:19 407:5 409:3	purpose 387:13, 14,25 464:25	384:25 quarter 370:3
propounded	385:12 394:19	purpose 387:13,	quarter 370:3
,	385:12 394:19 407:5 409:3 414:21 416:13 419:9 430:23	purpose 387:13, 14,25 464:25	quarter 370:3 question 251:6,7 254:3 266:8
propounded 317:7 363:10 384:21	385:12 394:19 407:5 409:3 414:21 416:13 419:9 430:23 431:6 434:9,10,21	purpose 387:13, 14,25 464:25 473:2 purposely 343:13	quarter 370:3 question 251:6,7 254:3 266:8 272:19 273:7
propounded 317:7 363:10 384:21 proprosals 293:15	385:12 394:19 407:5 409:3 414:21 416:13 419:9 430:23 431:6 434:9,10,21 435:11,13 436:24	purpose 387:13, 14,25 464:25 473:2 purposely 343:13 purposes 260:24	quarter 370:3 question 251:6,7 254:3 266:8 272:19 273:7 277:20 283:3,25
propounded 317:7 363:10 384:21	385:12 394:19 407:5 409:3 414:21 416:13 419:9 430:23 431:6 434:9,10,21	purpose 387:13, 14,25 464:25 473:2 purposely 343:13 purposes 260:24 370:7,18 387:5,23	quarter 370:3 question 251:6,7 254:3 266:8 272:19 273:7
propounded 317:7 363:10 384:21 proprosals 293:15 protective 447:21	385:12 394:19 407:5 409:3 414:21 416:13 419:9 430:23 431:6 434:9,10,21 435:11,13 436:24 446:19 456:15,23	purpose 387:13, 14,25 464:25 473:2 purposely 343:13 purposes 260:24	quarter 370:3 question 251:6,7 254:3 266:8 272:19 273:7 277:20 283:3,25
propounded 317:7 363:10 384:21 proprosals 293:15 protective 447:21 protector 446:24	385:12 394:19 407:5 409:3 414:21 416:13 419:9 430:23 431:6 434:9,10,21 435:11,13 436:24 446:19 456:15,23 providing 258:2	purpose 387:13, 14,25 464:25 473:2 purposely 343:13 purposes 260:24 370:7,18 387:5,23	quarter 370:3 question 251:6,7 254:3 266:8 272:19 273:7 277:20 283:3,25 287:12 290:7
propounded 317:7 363:10 384:21 proprosals 293:15 protective 447:21	385:12 394:19 407:5 409:3 414:21 416:13 419:9 430:23 431:6 434:9,10,21 435:11,13 436:24 446:19 456:15,23 providing 258:2 266:14 277:17	purpose 387:13, 14,25 464:25 473:2 purposely 343:13 purposes 260:24 370:7,18 387:5,23 394:7 418:9 pursuant 249:8	quarter 370:3 question 251:6,7 254:3 266:8 272:19 273:7 277:20 283:3,25 287:12 290:7 295:10,13 299:21 300:10 301:5
propounded 317:7 363:10 384:21 proprosals 293:15 protective 447:21 protector 446:24 447:19	385:12 394:19 407:5 409:3 414:21 416:13 419:9 430:23 431:6 434:9,10,21 435:11,13 436:24 446:19 456:15,23 providing 258:2 266:14 277:17 319:20 335:4	purpose 387:13, 14,25 464:25 473:2 purposely 343:13 purposes 260:24 370:7,18 387:5,23 394:7 418:9 pursuant 249:8 pursue 278:19	quarter 370:3 question 251:6,7 254:3 266:8 272:19 273:7 277:20 283:3,25 287:12 290:7 295:10,13 299:21 300:10 301:5 302:12,13 304:15
propounded 317:7 363:10 384:21 proprosals 293:15 protective 447:21 protector 446:24	385:12 394:19 407:5 409:3 414:21 416:13 419:9 430:23 431:6 434:9,10,21 435:11,13 436:24 446:19 456:15,23 providing 258:2 266:14 277:17 319:20 335:4 341:15 359:3	purpose 387:13, 14,25 464:25 473:2 purposely 343:13 purposes 260:24 370:7,18 387:5,23 394:7 418:9 pursuant 249:8 pursue 278:19 294:7 300:8	quarter 370:3 question 251:6,7 254:3 266:8 272:19 273:7 277:20 283:3,25 287:12 290:7 295:10,13 299:21 300:10 301:5 302:12,13 304:15 305:18 307:6,7
propounded 317:7 363:10 384:21 proprosals 293:15 protective 447:21 protector 446:24 447:19 provide 258:7	385:12 394:19 407:5 409:3 414:21 416:13 419:9 430:23 431:6 434:9,10,21 435:11,13 436:24 446:19 456:15,23 providing 258:2 266:14 277:17 319:20 335:4 341:15 359:3 390:25 391:2	purpose 387:13, 14,25 464:25 473:2 purposely 343:13 purposes 260:24 370:7,18 387:5,23 394:7 418:9 pursuant 249:8 pursue 278:19	quarter 370:3 question 251:6,7 254:3 266:8 272:19 273:7 277:20 283:3,25 287:12 290:7 295:10,13 299:21 300:10 301:5 302:12,13 304:15 305:18 307:6,7 309:1 310:8
propounded 317:7 363:10 384:21 proprosals 293:15 protective 447:21 protector 446:24 447:19 provide 258:7 259:2,8 260:18	385:12 394:19 407:5 409:3 414:21 416:13 419:9 430:23 431:6 434:9,10,21 435:11,13 436:24 446:19 456:15,23 providing 258:2 266:14 277:17 319:20 335:4 341:15 359:3	purpose 387:13, 14,25 464:25 473:2 purposely 343:13 purposes 260:24 370:7,18 387:5,23 394:7 418:9 pursuant 249:8 pursue 278:19 294:7 300:8	quarter 370:3 question 251:6,7 254:3 266:8 272:19 273:7 277:20 283:3,25 287:12 290:7 295:10,13 299:21 300:10 301:5 302:12,13 304:15 305:18 307:6,7

316:3,13,18 320:21,23 321:5, 20 322:12,15,24 327:19 331:11 332:15 334:7,21 341:22 345:12 347:16 348:7 358:24 359:14 363:4,22 364:8, 12,14,15 365:19 366:23 369:16 372:13 373:8 376:14,16 381:25 383:12 384:10,15, 16 385:5,24 388:25 392:15,18 401:21,24 403:3,7 406:9,15 407:25 413:14,23 414:2, 22 416:17 419:5 423:21 425:7,23 433:18,23 434:18 435:6 436:4,6,21 438:24 441:8,17 442:4,15,17 443:6,15,21 444:1,24 445:13, 16 447:16 448:10, 11 450:2,8,14 451:23 452:6,17, 20,22,24 453:3,6, 7,22,24 454:4 455:1 457:5 459:7 461:4 465:24 466:13 470:16,17 474:15
questionable 403:19 416:13
questioning 337:7 345:9 355:7 357:21 381:14 403:4 431:18 439:16
questions 244:21,

25 281:19 300:4

303:3,15 307:5

Evidentia
314:22 323:21 324:18 325:10,13 337:2,4,6 338:2,6, 14 344:15 345:3 347:9,19 358:25 359:23 360:4,12 361:4 364:1,3,5,6, 20 375:20 379:16, 20 384:5,7,23 386:24 389:7 391:11 395:3 397:14 398:8 400:5,23 407:12, 16,17,19 410:1, 16,19,21 412:19 413:21 415:5 420:18 421:12,16, 23 423:19,20 424:6,7,9 425:15, 18,20 426:10 428:5,21 439:9,25 452:13 454:1,12, 13,16 458:24,25 459:1 460:18,22 467:1 474:16
quick 246:24 249:15 271:13 291:21 297:1 323:23 375:24 379:3 397:17 410:3,6 426:15 452:23 466:11 475:18
quickly 282:2 407:7 433:5 457:9 459:4
quo 330:9,15 378:1,24
quote 307:10,11 462:21 465:16
quotes 367:1
R
raise 242:25 322:5

140-05 407-4
410:25 427:1
raised 244:23
245:1 254:22
355:16 431:12
raises 270:21
range 358:16
ranked 403:25 405:3
RAP 279:12,21,25 280:3,6
rate 243:20
248:23,24 249:1,
7,9,12,13 250:4
252:21 254:9,19
255:18 256:15,17, 18 257:1,19
259:17 260:25
261:24 263:2
264:10,11 265:10,
23 266:3,15
267:13,18,21
268:4,9,17
269:15,17 270:8
275:18,24 276:4, 8,14,15,19,22,23
277:16 278:19
279:16,25 280:15
282:10 283:12,16,
23 284:2,5,17,18,
19,23,24 286:3
287:2 288:2,3,5,
14 289:13,18 290:1 291:9,10,12
293:15,24 294:5,8
295:12 299:19
303:17 304:12
306:12 307:23
309:23 310:11,18
312:25 314:16
321:7,24 322:1,18
323:1,7,10,16 326:1 328:25
329:2,20 330:8
331:15 334:18
335:2 336:1,11

339:6,8,9,10,22, 23 340:8,20 341:9,24 342:1,2, 8,13 343:5,11 344:9,12 346:1,15 350:6,15,18,25 351:4 352:9,10, 16,18,19,20 353:19 354:7,12, 14,21 355:16 356:21 357:6 358:17,20,25 360:25 361:1,2,7, 8 366:12,13 367:10,13,16 368:4,13 370:6 372:22 373:1,19, 20 378:9,10,15 381:6,7 382:4 383:1,5,18 387:7, 11,12,17,19 388:2,5,10,12,15 389:3 390:18 395:9,13 396:5 397:4 402:6,7,16, 20,25 404:11,19, 20 406:4 408:1,2, 24,25 409:6,22 410:11 415:22 416:2,10,12,19 417:10,13,22 418:7,9,14,15,16, 17 420:1,2,4,5,6, 8,15,16 421:3 422:18 424:12,14, 15 425:1,4,6,25 426:2 427:20 429:3 430:3 432:11,18,22 435:21 438:9 439:1,5,11,14,21, 22 442:23 443:3, 9,10,16 444:2,5,8, 9,10,11,14,22 445:10 446:6 447:10 448:21 449:3,7,8,9,14

	Lviderillai	iy i icadagaary 51, 2024iila	ex. ratemakingrecommend
451:3,12,25	278:12 284:20	354:11 360:18	recalling 365:3
452:18,19 453:11,	287:24 302:6,21	368:13,20 378:20	recalls 413:20
12,14,16,20	303:21 319:6	382:16 383:2,8	
454:22,24,25	320:17 340:10	390:24 396:20	receive 259:13
455:16 457:14,16	345:16 362:4	435:24 436:12,13,	268:2 290:20
458:21 459:10,11,	385:15 442:18	20 438:6 441:13	387:9 417:5
16,25 460:6 461:2	455:7 466:10	448:24	425:25
463:1,21,25	468:19	reasonableness	received 246:8
464:5,20 466:1,	readily 409:3	344:7 382:3 388:6	274:14 286:17
15,22 470:13	_		287:14 324:14
472:5 475:9	reading 261:20	reasons 250:19	374:25 400:17
477:1,2	315:23	465:1 470:5	413:6 422:13
ratemaking 387:5,	reads 278:8	rebut 422:16	423:16 428:17
22 393:24 394:1	319:13		469:9 470:9
407:8 453:8		rebuttal 243:22,25	472:18 475:1
	real 313:1 323:23	245:2 261:24	
ratepayer 446:24	421:1 426:15	263:2 271:8	receiving 475:25
447:19	470:24	280:21 284:14	476:4
rates 250:1 263:18	realistically	296:10 298:8	recent 353:17
288:24 294:14	373:14	299:1 309:18	355:16 395:24
304:6,7,8,9	reality 327:19	313:9 386:4	401:18 461:15,17
323:11 327:21	393:24	390:18,20 399:22	recently 341:19
328:21 329:1,4,16		403:8 407:21	355:13
330:7 342:22	realize 245:17	411:20,21,23	
343:4,19 349:21	261:13 385:10	412:17,20 423:12	receptive 348:21
350:2,11,13,17,24	realized 261:10	427:23 432:4	recess 344:19,20,
351:18 352:1	na alma 044.7	434:6 438:13,16, 17,23 454:20	21,23 421:18,19,
367:7 370:8 373:9	realm 344:7	463:15 476:12,14,	20
379:11 380:6	realtime 276:11	17,18,23	recited 320:4
382:4,16 383:2,4,	417:2 456:3		recited 320.4
5,8 387:14 401:19	reask 442:17	recall 253:2,13,19,	recites 319:3
402:11 403:6		21 259:15,18	recognition
405:12 408:10,11	reason 250:17	268:9 285:11	276:24 312:24
417:15 418:20	253:3 256:5	286:6,15 288:12	
424:23 448:5,16	260:19 293:3	291:18 304:4	recognizing
463:22 464:2	378:6 390:11	314:6 318:13,16	260:14 295:25
466:21	433:21,23 441:9 445:23	319:3 322:13	310:17 367:17 392:12
rationale 471:7	440.23	334:25 335:9,15	392.12
rooch 251:11 20	reasonability	336:21 338:22	recollection
reach 251:11,20 263:12 271:6	449:3	340:25 364:11	270:15 286:5
342:18 345:14	reasonable 250:1	376:13,18 377:23 378:6,22 379:24,	290:18 334:1,4
	281:10 289:3	25 385:7 396:25	355:18,21 365:18
reached 252:17	296:4,10 303:18	398:24 410:8,23	397:1
255:14	305:2 329:13	426:14 444:23	recommend
read 251:17	330:7 344:2,3,5	459:12 467:5	298:15,20 350:1
261:19 277:11,23	348:18 350:19	477:12	355:9 356:19,24
, ,		177.12	
İ	l	1	ĺ.

		, , ,	
358:7,9 437:16	323:17 324:15	467:3	308:23 383:17
439:13 442:23	325:25 326:10,15	rodo 362:15 17	reflecting 279:17
444:2 452:2	327:9,13 332:4,9,	· ·	330:19
455:19 466:1,15	10 344:20,22,24	300.0 403.11	
rocommondation	355:11,17 356:20	redone 340:14	reflective 292:15
	364:17 376:2	reduce 361:12	350:14
	377:2 379:5,7,13		reflexive 292:7,13
	397:18 398:18		·
	399:14 400:18	reduction 374:4	refuse 463:11
	403:19 410:13	refer 247:18.19	refused 297:19
		1	301:22
464:22 466:3,17			
recommendations	·		regard 258:2
277:13 278:1,9,20			276:12 283:18
279:10,11,13,17	·		340:16 342:13
436:20 439:1,6	· · · · · · · · · · · · · · · · · · ·		353:7 367:14
444:11,14 445:8,		325:21 336:9	440:12
20,22 448:21,24	, , ,	referenced 251:25	regional 403:10,
449:2,14,18		317:18 346:23	16 407:24
455:23 458:5		422:10,22 456:21,	rograssian 226:10
464:14	,	22	regression 326:19 401:13,17 407:23
recommended		references 266:10	401.13,17 407.23
•			regret 446:7
		_	regularly 339:5
·	391.1 <i>1</i> 392. 4		442:11
	recovered 255:6	462:15	"- "- lete d 007:04
	recovery 262:10	referred 244:12	regulated 287:21
	277:19	254:25 258:20	regulatory 266:19
		317:3	267:1 279:12,17
		referring 270:4	280:18 311:11
356:24 444:13			312:19 313:5
recommends	425:13		344:24 358:21
309:6 382:25	recross-		369:7 376:4
reconcile 352:5	examination	1	454:25
	375:25 379:21		reinvent 340:11
reconciled 383:4	410:2,4 459:3,5		
reconsider 422:3.	red 261:16	1 ' '	reiterate 460:5
5			rejected 422:2
	redacted 274:11	<u> </u>	relate 248:11
•	redesigns 438:1	263:11 315:14,15	373:24 392:3
		reflect 251:6	
		284:12 323:17	related 242:9
			248:24 256:10
•		366:11 421:24	281:1 295:22
			302:12 317:8
JUD-11 JUD-15 JE	1 21 460-21 24	rofloated 204.4	
298:14 308:16,25	21 460:21,24	reflected 284:4	318:17 328:18,19
	439:13 442:23 444:2 452:2 455:19 466:1,15 recommendation 278:22 279:7 282:15 300:12 309:12 310:1,2,20 358:1 382:2 436:13 445:25 464:22 466:3,17 recommendations 277:13 278:1,9,20 279:10,11,13,17 436:20 439:1,6 444:11,14 445:8, 20,22 448:21,24 449:2,14,18 455:23 458:5 464:14 recommended 283:9 284:2,19 296:21 297:12 298:5 301:11,18 302:11 356:12 386:12 444:7 451:24 454:21 recommending 301:1,9 309:13 356:24 444:13 439:13 442:23 444:2 452:2 455:19 466:1,15 recommendation 278:22 279:7 282:15 300:12 309:12 310:1,2,20 358:1 382:2 436:13 445:25 464:22 466:3,17 recommendations 277:13 278:1,9,20 279:10,11,13,17 436:20 439:1,6 444:11,14 445:8, 20,22 448:21,24 449:2,14,18 455:23 458:5 464:14 recommended 283:9 284:2,19 296:21 297:12 298:5 301:11,18 302:11 356:12 386:12 444:7 451:24 454:21 recommending 301:1,9 309:13 356:24 444:13 recommending 301:1,9 309:13 356:24 444:13 recommending 301:1,9 309:13 356:24 444:13 recommending 301:1,9 309:13 356:24 444:13 recommending 301:1,9 309:13 356:24 444:13 recommending 301:1,9 309:13 356:24 444:13 recommending 301:1,9 309:13 356:24 444:13 recommending 301:1,9 309:13 356:24 444:13 recommending 301:1,9 309:13 356:24 444:13 recommending 301:1,9 309:13 356:24 444:13 recommending 301:1,9 309:13 356:24 444:13 recommending 301:1,9 309:13 356:24 444:13 recommending 301:1,9 309:13 356:24 444:13 recommending 301:1,9 309:13 356:24 444:13 recommending 301:1,9 309:13 356:24 444:13 recommending 301:1,9 309:13 356:24 444:13 recommending 301:1,9 309:13 356:24 444:13 recommending 301:1,9 309:13 356:24 444:13 recommending 301:1,9 309:13 356:24 388:1 recovery 262:10 277:19 recoss examination 375:25 379:21 410:2,4 459:3,5 red 261:16 redacted 274:11 redesigns 438:1 redirect 364:5 375:21 386:23 387:1 410:20 421:17 425:13,19,	439:13 442:23 444:2 452:2 455:19 466:1,15 10 344:20,22,24 17:2 379:5,7,13 39:12 310:1,2,20 358:1 382:2 436:13 445:25 464:22 466:3,17 recommendations 277:13 278:1,9,20 279:10,11,13,17 436:20 439:1,6 444:11,14 445:8, 20,22 448:21,24 449:2,14,18 455:23 458:5 464:14 recommended 283:9 284:2,19 298:5 301:11,18 302:11 356:12 386:12 444:7 451:24 454:21 recommending 301:1,9 309:13 356:24 444:13 recommends 309:6 382:25 reconciled 383:4 reconsider 422:3, 5 reconciled 383:4 record 242:2,9 243:13 246:5,9,11 247:2 253:6 269:9 270:18 274:15 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 284:12,22 287:15 291:23	

	Evidentia	ry Hearing January 31, 2	:024Index: relatesrequirin
333:21 344:9	reluctance 334:14	represent 295:8	299:3,25 318:10
371:15 372:24	rely 250:12 326:4	326:11,23 327:1	434:11 435:13
407:23 408:9	330:10 332:1	representation	requests 247:18
409:10 414:18	368:17 378:20,25	247:13 253:3	251:24 254:2,22
431:12 432:15	,	332:2	255:1,2 258:19
455:2,4	relying 264:4		270:23 303:4,14
relates 257:9	remain 309:14	representative	306:17,24 307:15,
343:16 350:16,22	remainder 341:6	341:6	21 308:1,5,17
471:1		represented 339:4	312:20 313:11
elationship	remaining 404:10,	representing	314:1,2,14,19,20
266:20 313:1	18	285:20 467:16	315:5 316:18,23
343:24 369:10,11	remarks 338:19		317:3,4,12 324:22
375:9 380:5	remember 342:4	represents 305:14	338:7 347:12,24
	345:12 364:23	reprinted 294:20	348:2 355:10
elationships		roproduced	359:4 361:16
281:8 342:9,11	365:18,21 477:14	reproduced 285:21	362:1 363:5,16,21
366:11 371:24	remove 451:17	200.21	364:13,21,24
383:10	475:20	request 258:5	365:4,6,10,12,14
elative 265:15	removed 379:10	261:22 262:16	384:18,20,24
297:20 301:23	476:1,16	267:17 280:22	388:12 391:11,12,
307:22 312:14	·	297:20,24 301:23	16,21 392:13
331:17 357:9	renew 473:21,24	302:18 308:6	418:24 419:22
364:19 381:6	renewables	309:15 310:10	429:15,20 431:21
460:9	343:23	314:16,25 315:1	440:18,24 453:20
elevance 291:3	reorganize 274:19	316:6,19,25	461:14,18
319:7 321:14		326:25 342:1	require 270:25
398:1,2 423:4,5	repeat 304:16	347:18,22 352:5	309:9 404:11,19
443:1 444:19	406:9 422:21	358:3 369:6,14	445:21 461:18,21
445:14 447:3,5	424:13	372:5 385:21	463:7 465:16
449:21,25	repetitive 419:23	386:15 388:9,11, 22 418:7 436:24	required 244:8
•	replaced 244:15	441:2 463:12	294:4 381:19
relevant 284:17,18	•	464:3 471:17	382:12 434:12,16,
331:10 339:10	replacing 371:22		23 435:2,15,16
383:15 393:21	report 252:4 277:7	requested 296:8	436:8,11,14 437:5
398:10 436:14 453:23	278:21,23 280:4	299:14,20 302:9	441:5,21
	303:21 312:5,10	303:19 309:8	,
eliability 370:18	317:20 324:4,11	318:14,16,17	requirement
reliable 306:10	372:4 477:1	319:2,4,11 320:14	375:14 382:15
	reporter 249:16	329:17,19 334:3	403:1 447:10
reliance 403:9	259:24 278:2,5	377:22 386:18	requirements
reliant 314:11	328:24 361:22	389:3 390:8,10 409:9 418:7,10	280:25
	465:19	464:22 469:1,4	requires 255:10
relied 250:13		476:20	361:12 376:10
	reporting 417·14	T10.20	
relief 318:14,16,17	reporting 417:14		requiring 462:20
relied 250:13 relief 318:14,16,17 319:4,24 332:5,6	reporting 417:14 repository 297:22 302:17 306:15	requesting 249:22 261:5 290:11	requiring 462:20

reread 434:13
research 334:18 335:4,7 407:4 411:18
residential 262:1 263:4 271:17 288:2 333:12 343:3,15 352:12 369:18 373:9 383:4 396:15 401:18 402:7 406:3 416:2 417:7,9 448:5,16 451:12 460:16
resolution 251:21 263:12 297:23 302:17 306:15 345:14
resolve 261:17 263:13 309:6 413:25 414:3,5,14 415:1
resolved 268:12 414:23 415:4
resource 276:16
Resources 277:8 324:5,12
respect 305:10 363:22
respects 321:8
respond 276:10 338:17 342:2 347:23 362:9 445:17 463:10,14
responded 341:24
respondents 319:17,18
response 255:4, 10 258:10 261:22 262:18 263:3,8 270:25 272:19

276:20 277:7

Evidentia
279:4 308:23 313:20 315:5 321:11 324:4,11 333:13 335:18 338:12 343:7 344:11 353:15,20 358:3 362:10 369:13 373:10 375:11 384:13 386:10 388:18 395:3 398:7 409:22 419:3,9 420:11,17 425:23 433:16 447:7 475:16
responses 261:3 313:10 316:22 317:10,17 323:20 326:25 343:10 351:20 368:15 419:2,5,10 462:15 464:4
responsible 378:10
responsive 278:23 438:17
responsiveness 276:15 277:17 279:6 351:15 358:22
rest 255:7 271:12 278:12 432:6
restate 365:11 385:24 435:6 448:11
result 265:9 266:3 346:18 368:9,20 371:13 377:22 405:24 463:8 467:20
resulted 263:3 289:5
results 327:16

retail 280:11	rid 344:5 451:14		
376:11	Riley 272:24 Riley's 273:18		
retain 259:8			
retained 250:24	473:16 474:17		
272:7 434:10 435:12	risk 462:8		
retention 318:25	RLJ's 247:17		
359:1 432:10	road 452:21 470:8		
retirement 326:14, 18 327:3 396:11	robust 289:5 role 300:4 422:18		
retrieve 338:25	439:1,3,8,10,13		
retrospect 252:7 304:20	442:23 443:3 444:1,17,22 445:1,2,11		
return 337:7 383:5	446:15,23 447:8,		
returning 337:5	13,18 448:4,15,		
344:24	19,20,23 449:13 451:4 461:1		
returns 316:16	roles 438:25		
reveal 313:11	446:14		
revenue 262:10 277:18 403:1,5	roll 468:7		
406:25 408:17	room 305:11		
438:8	321:2 322:5 337:20 464:4		
revenues 351:22	472:6		
368:5,10,11,14 374:25 402:24	roughly 328:6,12		
408:13 416:8	365:12 376:22 457:20,21 459:8		
418:8 421:3 425:5	round 421:24		
reverse 256:14 408:15			
	route 331:15,20, 21 332:2		
review 380:11 388:6 429:10,14,	routinely 267:12		
18 430:4,13 458:5	rows 392:13		
464:13 466:21	RTO 279:5 343:24		
reviewed 293:17 429:20 430:1,20	rule 471:7 474:9		
455:24	ruled 473:7,19		
revisit 421:23	475:6		
reword 450:14	rules 274:10		
rewording 445:16	382:10 475:15		
5			

ruling 446:5,7 474:12,19
run 293:5 301:13 347:13 369:24 370:3 426:23 461:15 462:12
running 286:13 384:3 393:12 397:3
Rupp 246:12 325:10,11,14 336:24 338:6 365:17 377:20 423:20,21,24 424:1 467:12,13, 15
rush 297:3
S
S-E-R-C 370:20
S-T-A-H-L-M-A-N 399:16
S-T-A-H-L-M-A-N
S-T-A-H-L-M-A-N 399:16
S-T-A-H-L-M-A-N 399:16 safe 254:21 sake 249:15 278:13 376:2 377:2 410:13 460:1,13 471:25
S-T-A-H-L-M-A-N 399:16 safe 254:21 sake 249:15 278:13 376:2 377:2 410:13 460:1,13 471:25 473:8,24 477:9 sample 255:4 267:22 268:3,20 333:3,8,18 344:9 361:17 369:9 376:22 377:13,16
S-T-A-H-L-M-A-N 399:16 safe 254:21 sake 249:15 278:13 376:2 377:2 410:13 460:1,13 471:25 473:8,24 477:9 sample 255:4 267:22 268:3,20 333:3,8,18 344:9 361:17 369:9 376:22 377:13,16 406:21 407:6 Sarah 242:24 243:8,15 292:7 345:2 satisfied 354:9
S-T-A-H-L-M-A-N 399:16 safe 254:21 sake 249:15 278:13 376:2 377:2 410:13 460:1,13 471:25 473:8,24 477:9 sample 255:4 267:22 268:3,20 333:3,8,18 344:9 361:17 369:9 376:22 377:13,16 406:21 407:6 Sarah 242:24 243:8,15 292:7 345:2

Evidentiar
saver 330:16
savings 377:22
scenario 260:15 311:11 312:18 453:8
schedule 246:24 247:11 253:25 254:6 256:15,17 257:1 261:14 350:15 352:13 353:19 368:24 387:11 413:16 419:24 458:1 465:17 478:5,10
scheduled 286:14 373:4
schedules 256:18 284:5 312:25 350:6 387:7,18,19 388:5
scheduling 478:22,24
science 407:9 437:21
Scott 467:15
screwed 294:19 356:17
SCURLOCK 422:9 471:21 472:8
season 463:22,23
seasonality 418:4
seat 243:4
secondary 255:9 265:19 303:7,10 307:10 314:24 328:18 329:4,12 331:23 361:6 374:7 415:24
seconds 364:11
section 302:11 465:15 470:20

seek 319:22
seeking 270:18 281:13 318:11 359:16 415:22 422:14 436:18 455:11 474:17
seldom 326:24
self-explanatory 433:12
send 245:12 252:3
sense 387:18 393:24 398:1 465:8
sentence 278:11 295:15 316:15,16 365:7 391:21
sentences 474:13, 14
separate 282:22 289:20 302:12 310:1 313:23 314:16,19,25 315:1 420:5 431:18
separately 317:22 431:24
September 253:5, 10 372:18
SERC 370:19
serial 396:10
series 361:4
serve 376:11
served 329:2,3,4 342:17 350:8 374:6 388:17 464:1,7
service 249:17,20, 23 250:14 265:7 280:23 281:1,4 304:5,11,14 305:15 306:7,9

326:12 327:5 328:4,5 329:11, 12,20,23 332:18 343:17 366:11 378:11,15,25 379:8,15 383:6 387:9,10 399:19 411:17 415:19,24 427:19 435:24 444:9 471:1,18
services 340:20
set 247:23 248:4, 19 265:22 271:3 282:13,14,19 296:8,14 298:4, 16,22 302:10 304:6,7,8,9,11 310:3 314:20 326:17 332:24,25 361:21 385:21 386:5 406:20,21 412:20 413:24 414:2 415:15 418:7 429:3,5,9 437:13 458:1
sets 247:19 271:3 299:4 317:12 329:1 359:2 406:19 419:23 421:7 455:18
setting 259:20 312:9 381:5 382:15 451:4 462:8
settle 478:15
settlement 346:2, 4 348:4,7 373:15 468:6 478:10,11
SGS 262:2 263:5 342:14
shape 375:5,9 406:22
share 333:13

		, , ,	<u>'</u>
471:15	signed 255:20	357:12 387:17	376:17 397:5
shareholders	380:19 389:12	388:15	441:2 449:5,6
300:16	465:2	sizes 265:16,17	sorts 250:6 335:15
Shawn 351:13	significance	326:18	369:11 375:8
shebang 471:19	369:17	slide 287:17 292:5	396:13
	significant 357:15	373:7	sought 251:12
sheet 246:19 261:15 375:22	375:15 416:25	slides 288:13	436:19
407:14 469:12	417:3	slightly 353:15	sound 250:20
475:9	signing 253:13	445:16	279:23 455:9
sheets 248:12	343:9 367:9	slow 278:2 308:13	sounded 425:24
476:24	silly 398:17		sounds 295:24
shelf 389:7	similar 244:5	slower 416:20	Spanos 250:25
	295:23 306:17	slowly 272:22	325:22
shift 409:19 458:4	336:4 341:4	273:20	
shifted 335:8	395:19 402:4 408:4 463:13	slurry 440:24	speak 269:9 273:4 290:8 292:25
shocked 346:20		smack 368:2	293:1,7,8 307:16
shocking 267:9	similarly 281:9 336:12 382:7	small 262:12	392:1 452:16,17
332:14 360:21		308:14 396:16	speaking 264:1
short 322:7	simpler 387:24	415:24 417:25	314:10 468:16
410:23 426:13	simplifying 375:4	451:13 473:23	speaks 254:10
455:25 457:7	simply 471:8	smallest 326:15	269:16 270:14
464:15	475:25	smelter 396:17	290:14 292:20
shorten 282:1	single 308:6 441:2	software 259:20	380:16 422:24
shorter 456:6	456:13		434:20
464:12 475:13	sir 300:25 399:2	solemnly 243:1 399:2 411:1 427:2	specific 248:11
shortfall 367:5	427:5		255:5 278:14
shorthand 476:20	sit 313:16 315:10	solicit 290:20	300:8 304:10 313:19 318:14
	362:15	solution 368:12	321:16 328:2
shortly 338:1	site 333:14	472:7	339:8,9 356:9
show 296:18		solve 251:13	414:6 416:4
showing 308:13	sitting 255:12 275:2 290:15	son 373:5	435:17 436:21
327:13		sooner 351:8	439:9,16 448:2
side 261:14	situated 281:9	458:13	450:3,7 473:6
337:21 343:15,18	336:12 382:7	sort 248:14 255:6	specifically
433:16 445:4	situation 276:21	259:14 265:6	243:22 277:15
sidestep 368:4	279:6 330:20 343:14 356:3	270:13 286:13	316:16 365:19 383:16 386:12
sign 266:2 329:15	435:16	289:17 300:9	399:22 411:20
389:14		303:1 305:8,13	416:2 427:23
signals 277:18	six-month 457:20	318:1 332:1,8,11,	429:18,22,24
alyliaia ZII.10	size 264:17,18,19	24 334:5 339:15, 22 346:6 361:19	435:7,9 456:17
	333:10 350:9	ZZ 340.0 301.19	459:9 463:1
			1

specimen 258:25	278:9,19,22	422:6,7,11,15	469:4,9 470:6
259:1	279:7,10 280:15	427:20 429:23,24	472:18 473:22
speculate 385:14	281:6 285:5,6	430:21,23 431:13	474:20
_	286:2 287:1	432:8,18 433:9,	stage 422:10
speculation 290:4	288:22 289:13	15,18,24 434:2	423:7 453:1
306:2 311:16	290:11 292:8,16	435:18 436:18	
385:23 440:7,8,10	293:4,19 294:16	437:11,18,22	Stahlman 267:2
450:23	297:20,24 298:14,	438:14,22 441:12	398:25 399:1,9,16
speculative 311:2	19 299:2,10	442:11 443:3	400:22 401:1
_	300:5,22 301:1,3,	444:6,18,22	407:17 410:22
spell 243:14	4,9,11,14,22	445:2,19 446:14,	424:24 476:17
280:17 399:15	302:18 303:19	15,17,23 447:9,	stakeholder 373:9
411:13 427:15	306:8 309:5,15	14,18 448:4,15,	434:22
spelled 394:8	310:21 311:10	20,23 449:13	
411:14	313:11 318:10	450:18,21,24	stakeholders
enalling 220:24	319:1,9,13,15,21	451:17,19,24	284:24 285:25
spelling 338:24	320:2 321:6,7,23	452:18,25 453:7,	321:24
spend 251:18	323:1,12,13	12 455:11,18	stale 354:2 458:20
252:10 296:6,14	324:4,11,19,22	456:12 463:10	staleness 342:7
298:4,9 371:10	325:24 326:3	464:21,23 465:13,	Statemess 342.1
437:12	329:14,24 330:6	25 466:15,20	staler 458:20
spending 296:20	331:2 335:5	467:24 469:18,20	stand 316:3 348:8
	336:4,16 338:9	470:15 473:1	399:1 423:3
Chant 7/3:73	240.4 244.24	476:10 477:20	
spent 273:23	340:1 341:24		420:13
357:14 467:23	340:1 341:24 343:8 345:2,17		426:13
	343:8 345:2,17 347:14 348:12,14,	staff's 246:8	420:13 standard 423:4
357:14 467:23 spin 270:15	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9	staff's 246:8 247:16 251:16,17,	
357:14 467:23 spin 270:15 spirit 423:12	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17	staff's 246:8 247:16 251:16,17, 25 254:13 275:18,	standard 423:4 standards 280:17
357:14 467:23 spin 270:15	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17 354:21,24 355:16,	staff's 246:8 247:16 251:16,17, 25 254:13 275:18, 23,24 276:4	standard 423:4 standards 280:17 standpoint 467:17
357:14 467:23 spin 270:15 spirit 423:12 split 255:8 265:18	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17 354:21,24 355:16, 20 363:5,11,16	staff's 246:8 247:16 251:16,17, 25 254:13 275:18, 23,24 276:4 277:12 279:13,16,	standard 423:4 standards 280:17 standpoint 467:17 471:11
357:14 467:23 spin 270:15 spirit 423:12 split 255:8 265:18 spoke 327:1	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17 354:21,24 355:16, 20 363:5,11,16 366:7,17,25 367:2	staff's 246:8 247:16 251:16,17, 25 254:13 275:18, 23,24 276:4 277:12 279:13,16, 24 284:19 291:4,	standard 423:4 standards 280:17 standpoint 467:17
357:14 467:23 spin 270:15 spirit 423:12 split 255:8 265:18 spoke 327:1 spot 458:15	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17 354:21,24 355:16, 20 363:5,11,16 366:7,17,25 367:2 369:1 372:15	staff's 246:8 247:16 251:16,17, 25 254:13 275:18, 23,24 276:4 277:12 279:13,16, 24 284:19 291:4, 16 293:6 295:6,16	standard 423:4 standards 280:17 standpoint 467:17 471:11
357:14 467:23 spin 270:15 spirit 423:12 split 255:8 265:18 spoke 327:1 spot 458:15 SPP 343:21	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17 354:21,24 355:16, 20 363:5,11,16 366:7,17,25 367:2 369:1 372:15 373:7 374:21	staff's 246:8 247:16 251:16,17, 25 254:13 275:18, 23,24 276:4 277:12 279:13,16, 24 284:19 291:4,	standard 423:4 standards 280:17 standpoint 467:17 471:11 stands 260:1 Staples 397:8
357:14 467:23 spin 270:15 spirit 423:12 split 255:8 265:18 spoke 327:1 spot 458:15	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17 354:21,24 355:16, 20 363:5,11,16 366:7,17,25 367:2 369:1 372:15 373:7 374:21 375:5 377:16,22	staff's 246:8 247:16 251:16,17, 25 254:13 275:18, 23,24 276:4 277:12 279:13,16, 24 284:19 291:4, 16 293:6 295:6,16 296:5 298:8	standard 423:4 standards 280:17 standpoint 467:17 471:11 stands 260:1 Staples 397:8 staring 375:3
357:14 467:23 spin 270:15 spirit 423:12 split 255:8 265:18 spoke 327:1 spot 458:15 SPP 343:21 370:17	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17 354:21,24 355:16, 20 363:5,11,16 366:7,17,25 367:2 369:1 372:15 373:7 374:21 375:5 377:16,22 378:13 380:11,15	staff's 246:8 247:16 251:16,17, 25 254:13 275:18, 23,24 276:4 277:12 279:13,16, 24 284:19 291:4, 16 293:6 295:6,16 296:5 298:8 309:13 312:20	standard 423:4 standards 280:17 standpoint 467:17 471:11 stands 260:1 Staples 397:8 staring 375:3 start 248:2 254:5
357:14 467:23 spin 270:15 spirit 423:12 split 255:8 265:18 spoke 327:1 spot 458:15 SPP 343:21 370:17 spread 304:12	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17 354:21,24 355:16, 20 363:5,11,16 366:7,17,25 367:2 369:1 372:15 373:7 374:21 375:5 377:16,22 378:13 380:11,15 381:11 382:2,25	staff's 246:8 247:16 251:16,17, 25 254:13 275:18, 23,24 276:4 277:12 279:13,16, 24 284:19 291:4, 16 293:6 295:6,16 296:5 298:8 309:13 312:20 316:23 318:23	standard 423:4 standards 280:17 standpoint 467:17 471:11 stands 260:1 Staples 397:8 staring 375:3 start 248:2 254:5 260:16 287:11
357:14 467:23 spin 270:15 spirit 423:12 split 255:8 265:18 spoke 327:1 spot 458:15 SPP 343:21 370:17 spread 304:12 stable 331:22	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17 354:21,24 355:16, 20 363:5,11,16 366:7,17,25 367:2 369:1 372:15 373:7 374:21 375:5 377:16,22 378:13 380:11,15 381:11 382:2,25 383:21 386:6,10,	staff's 246:8 247:16 251:16,17, 25 254:13 275:18, 23,24 276:4 277:12 279:13,16, 24 284:19 291:4, 16 293:6 295:6,16 296:5 298:8 309:13 312:20 316:23 318:23 325:3 330:17	standard 423:4 standards 280:17 standpoint 467:17 471:11 stands 260:1 Staples 397:8 staring 375:3 start 248:2 254:5 260:16 287:11 325:10 330:1
357:14 467:23 spin 270:15 spirit 423:12 split 255:8 265:18 spoke 327:1 spot 458:15 SPP 343:21 370:17 spread 304:12	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17 354:21,24 355:16, 20 363:5,11,16 366:7,17,25 367:2 369:1 372:15 373:7 374:21 375:5 377:16,22 378:13 380:11,15 381:11 382:2,25 383:21 386:6,10, 18 387:4,10,12	staff's 246:8 247:16 251:16,17, 25 254:13 275:18, 23,24 276:4 277:12 279:13,16, 24 284:19 291:4, 16 293:6 295:6,16 296:5 298:8 309:13 312:20 316:23 318:23 325:3 330:17 341:25 349:9	standard 423:4 standards 280:17 standpoint 467:17 471:11 stands 260:1 Staples 397:8 staring 375:3 start 248:2 254:5 260:16 287:11 325:10 330:1 345:8 351:19
357:14 467:23 spin 270:15 spirit 423:12 split 255:8 265:18 spoke 327:1 spot 458:15 SPP 343:21 370:17 spread 304:12 stable 331:22	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17 354:21,24 355:16, 20 363:5,11,16 366:7,17,25 367:2 369:1 372:15 373:7 374:21 375:5 377:16,22 378:13 380:11,15 381:11 382:2,25 383:21 386:6,10, 18 387:4,10,12 388:3,5,10 389:2,	staff's 246:8 247:16 251:16,17, 25 254:13 275:18, 23,24 276:4 277:12 279:13,16, 24 284:19 291:4, 16 293:6 295:6,16 296:5 298:8 309:13 312:20 316:23 318:23 325:3 330:17 341:25 349:9 354:1 356:14,16	standard 423:4 standards 280:17 standpoint 467:17 471:11 stands 260:1 Staples 397:8 staring 375:3 start 248:2 254:5 260:16 287:11 325:10 330:1 345:8 351:19 352:21 364:8
357:14 467:23 spin 270:15 spirit 423:12 split 255:8 265:18 spoke 327:1 spot 458:15 SPP 343:21 370:17 spread 304:12 stable 331:22 371:14	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17 354:21,24 355:16, 20 363:5,11,16 366:7,17,25 367:2 369:1 372:15 373:7 374:21 375:5 377:16,22 378:13 380:11,15 381:11 382:2,25 383:21 386:6,10, 18 387:4,10,12 388:3,5,10 389:2, 3,16 391:6 393:4	staff's 246:8 247:16 251:16,17, 25 254:13 275:18, 23,24 276:4 277:12 279:13,16, 24 284:19 291:4, 16 293:6 295:6,16 296:5 298:8 309:13 312:20 316:23 318:23 325:3 330:17 341:25 349:9 354:1 356:14,16 374:1 376:16	standard 423:4 standards 280:17 standpoint 467:17 471:11 stands 260:1 Staples 397:8 staring 375:3 start 248:2 254:5 260:16 287:11 325:10 330:1 345:8 351:19 352:21 364:8 370:11 409:20
357:14 467:23 spin 270:15 spirit 423:12 split 255:8 265:18 spoke 327:1 spot 458:15 SPP 343:21 370:17 spread 304:12 stable 331:22 371:14 staff 242:6 243:19	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17 354:21,24 355:16, 20 363:5,11,16 366:7,17,25 367:2 369:1 372:15 373:7 374:21 375:5 377:16,22 378:13 380:11,15 381:11 382:2,25 383:21 386:6,10, 18 387:4,10,12 388:3,5,10 389:2, 3,16 391:6 393:4 395:17 397:18,23	staff's 246:8 247:16 251:16,17, 25 254:13 275:18, 23,24 276:4 277:12 279:13,16, 24 284:19 291:4, 16 293:6 295:6,16 296:5 298:8 309:13 312:20 316:23 318:23 325:3 330:17 341:25 349:9 354:1 356:14,16 374:1 376:16 378:25 388:9	standard 423:4 standards 280:17 standpoint 467:17 471:11 stands 260:1 Staples 397:8 staring 375:3 start 248:2 254:5 260:16 287:11 325:10 330:1 345:8 351:19 352:21 364:8 370:11 409:20 422:6 452:18
357:14 467:23 spin 270:15 spirit 423:12 split 255:8 265:18 spoke 327:1 spot 458:15 SPP 343:21 370:17 spread 304:12 stable 331:22 371:14 staff 242:6 243:19 249:1,6,21,24	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17 354:21,24 355:16, 20 363:5,11,16 366:7,17,25 367:2 369:1 372:15 373:7 374:21 375:5 377:16,22 378:13 380:11,15 381:11 382:2,25 383:21 386:6,10, 18 387:4,10,12 388:3,5,10 389:2, 3,16 391:6 393:4 395:17 397:18,23 399:5 400:17	staff's 246:8 247:16 251:16,17, 25 254:13 275:18, 23,24 276:4 277:12 279:13,16, 24 284:19 291:4, 16 293:6 295:6,16 296:5 298:8 309:13 312:20 316:23 318:23 325:3 330:17 341:25 349:9 354:1 356:14,16 374:1 376:16 378:25 388:9 389:20 398:4	standard 423:4 standards 280:17 standpoint 467:17 471:11 stands 260:1 Staples 397:8 staring 375:3 start 248:2 254:5 260:16 287:11 325:10 330:1 345:8 351:19 352:21 364:8 370:11 409:20 422:6 452:18 469:18 470:22
357:14 467:23 spin 270:15 spirit 423:12 split 255:8 265:18 spoke 327:1 spot 458:15 SPP 343:21 370:17 spread 304:12 stable 331:22 371:14 staff 242:6 243:19 249:1,6,21,24 250:5,10 253:9	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17 354:21,24 355:16, 20 363:5,11,16 366:7,17,25 367:2 369:1 372:15 373:7 374:21 375:5 377:16,22 378:13 380:11,15 381:11 382:2,25 383:21 386:6,10, 18 387:4,10,12 388:3,5,10 389:2, 3,16 391:6 393:4 395:17 397:18,23 399:5 400:17 401:9,13,17	staff's 246:8 247:16 251:16,17, 25 254:13 275:18, 23,24 276:4 277:12 279:13,16, 24 284:19 291:4, 16 293:6 295:6,16 296:5 298:8 309:13 312:20 316:23 318:23 325:3 330:17 341:25 349:9 354:1 356:14,16 374:1 376:16 378:25 388:9 389:20 398:4 408:6,8 413:6	standard 423:4 standards 280:17 standpoint 467:17 471:11 stands 260:1 Staples 397:8 staring 375:3 start 248:2 254:5 260:16 287:11 325:10 330:1 345:8 351:19 352:21 364:8 370:11 409:20 422:6 452:18
357:14 467:23 spin 270:15 spirit 423:12 split 255:8 265:18 spoke 327:1 spot 458:15 SPP 343:21 370:17 spread 304:12 stable 331:22 371:14 staff 242:6 243:19 249:1,6,21,24 250:5,10 253:9 254:1,21 256:8	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17 354:21,24 355:16, 20 363:5,11,16 366:7,17,25 367:2 369:1 372:15 373:7 374:21 375:5 377:16,22 378:13 380:11,15 381:11 382:2,25 383:21 386:6,10, 18 387:4,10,12 388:3,5,10 389:2, 3,16 391:6 393:4 395:17 397:18,23 399:5 400:17 401:9,13,17 402:17 406:6,11	staff's 246:8 247:16 251:16,17, 25 254:13 275:18, 23,24 276:4 277:12 279:13,16, 24 284:19 291:4, 16 293:6 295:6,16 296:5 298:8 309:13 312:20 316:23 318:23 325:3 330:17 341:25 349:9 354:1 356:14,16 374:1 376:16 378:25 388:9 389:20 398:4 408:6,8 413:6 415:1 422:18	standard 423:4 standards 280:17 standpoint 467:17 471:11 stands 260:1 Staples 397:8 staring 375:3 start 248:2 254:5 260:16 287:11 325:10 330:1 345:8 351:19 352:21 364:8 370:11 409:20 422:6 452:18 469:18 470:22
357:14 467:23 spin 270:15 spirit 423:12 split 255:8 265:18 spoke 327:1 spot 458:15 SPP 343:21 370:17 spread 304:12 stable 331:22 371:14 staff 242:6 243:19 249:1,6,21,24 250:5,10 253:9 254:1,21 256:8 258:18 259:9 261:1,6 264:4,8, 16 265:6,10,12	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17 354:21,24 355:16, 20 363:5,11,16 366:7,17,25 367:2 369:1 372:15 373:7 374:21 375:5 377:16,22 378:13 380:11,15 381:11 382:2,25 383:21 386:6,10, 18 387:4,10,12 388:3,5,10 389:2, 3,16 391:6 393:4 395:17 397:18,23 399:5 400:17 401:9,13,17 402:17 406:6,11 407:22 408:1,3,8,	staff's 246:8 247:16 251:16,17, 25 254:13 275:18, 23,24 276:4 277:12 279:13,16, 24 284:19 291:4, 16 293:6 295:6,16 296:5 298:8 309:13 312:20 316:23 318:23 325:3 330:17 341:25 349:9 354:1 356:14,16 374:1 376:16 378:25 388:9 389:20 398:4 408:6,8 413:6 415:1 422:18 423:11,16 428:17	standard 423:4 standards 280:17 standpoint 467:17 471:11 stands 260:1 Staples 397:8 staring 375:3 start 248:2 254:5 260:16 287:11 325:10 330:1 345:8 351:19 352:21 364:8 370:11 409:20 422:6 452:18 469:18 470:22 475:7
357:14 467:23 spin 270:15 spirit 423:12 split 255:8 265:18 spoke 327:1 spot 458:15 SPP 343:21 370:17 spread 304:12 stable 331:22 371:14 staff 242:6 243:19 249:1,6,21,24 250:5,10 253:9 254:1,21 256:8 258:18 259:9 261:1,6 264:4,8,	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17 354:21,24 355:16, 20 363:5,11,16 366:7,17,25 367:2 369:1 372:15 373:7 374:21 375:5 377:16,22 378:13 380:11,15 381:11 382:2,25 383:21 386:6,10, 18 387:4,10,12 388:3,5,10 389:2, 3,16 391:6 393:4 395:17 397:18,23 399:5 400:17 401:9,13,17 402:17 406:6,11 407:22 408:1,3,8, 22 409:8 413:25	staff's 246:8 247:16 251:16,17, 25 254:13 275:18, 23,24 276:4 277:12 279:13,16, 24 284:19 291:4, 16 293:6 295:6,16 296:5 298:8 309:13 312:20 316:23 318:23 325:3 330:17 341:25 349:9 354:1 356:14,16 374:1 376:16 378:25 388:9 389:20 398:4 408:6,8 413:6 415:1 422:18 423:11,16 428:17 432:23 436:18	standard 423:4 standards 280:17 standpoint 467:17 471:11 stands 260:1 Staples 397:8 staring 375:3 start 248:2 254:5 260:16 287:11 325:10 330:1 345:8 351:19 352:21 364:8 370:11 409:20 422:6 452:18 469:18 470:22 475:7 started 242:7 255:15 468:14
357:14 467:23 spin 270:15 spirit 423:12 split 255:8 265:18 spoke 327:1 spot 458:15 SPP 343:21 370:17 spread 304:12 stable 331:22 371:14 staff 242:6 243:19 249:1,6,21,24 250:5,10 253:9 254:1,21 256:8 258:18 259:9 261:1,6 264:4,8, 16 265:6,10,12	343:8 345:2,17 347:14 348:12,14, 19 351:7 352:9 353:11,12,17 354:21,24 355:16, 20 363:5,11,16 366:7,17,25 367:2 369:1 372:15 373:7 374:21 375:5 377:16,22 378:13 380:11,15 381:11 382:2,25 383:21 386:6,10, 18 387:4,10,12 388:3,5,10 389:2, 3,16 391:6 393:4 395:17 397:18,23 399:5 400:17 401:9,13,17 402:17 406:6,11 407:22 408:1,3,8,	staff's 246:8 247:16 251:16,17, 25 254:13 275:18, 23,24 276:4 277:12 279:13,16, 24 284:19 291:4, 16 293:6 295:6,16 296:5 298:8 309:13 312:20 316:23 318:23 325:3 330:17 341:25 349:9 354:1 356:14,16 374:1 376:16 378:25 388:9 389:20 398:4 408:6,8 413:6 415:1 422:18 423:11,16 428:17 432:23 436:18 437:10,14 438:3,	standard 423:4 standards 280:17 standpoint 467:17 471:11 stands 260:1 Staples 397:8 staring 375:3 start 248:2 254:5 260:16 287:11 325:10 330:1 345:8 351:19 352:21 364:8 370:11 409:20 422:6 452:18 469:18 470:22 475:7 started 242:7

351:7 352:1 403:8	statutory 382:15	strive 446:17,21	383:6,14,21 398:11 429:23
starts 266:22 301:19 401:8	stay 279:14 362:22 467:10	strong 446:24 447:19,21 471:12	435:24 464:24
457:15 464:10	474:11	strongly 391:19	466:2,17 470:20
startup 355:3	step 327:23,25		471:2
state 243:13	stepping 445:11	structure 264:10, 11 265:23,24	studying 281:8 351:20
246:11 263:8		280:16 288:14	
285:1 297:17	stickie 475:3	303:17 310:18	stuff 441:5 476:16
309:5 313:10	stickies 470:12	350:25 351:4	subclass 333:10
334:12 336:3,14	stipulation 247:19	368:14 383:18	subject 253:20
359:20 399:14	248:16 249:6	422:18 453:11,12,	307:25 361:24
404:9 411:12	253:4,6,7,10,13	15	398:5,24 410:23
414:10 427:14	255:1,20 258:11	structures 276:14	426:13 467:5
434:7 459:22	263:4 282:23	277:16 284:18	
state's 383:16	283:10 299:5	288:2,3 350:18	subjected 338:14
stated 257:19	309:21 312:16	366:12 463:21	subjecting 400:22
276:1 333:2	313:13 315:12,16	struggling 453:2	subjective 367:6
334:1,2 336:5	316:5 317:2,25 319:18,19 325:23	studied 371:24	subjects 422:15
396:3 397:1	334:10 338:23		
414:19 419:13,16	340:6 346:1 347:6	studies 249:7,23	submissions
420:23 424:20	359:24 362:23	250:14 303:24	455:2,4
statement 248:21	364:25 372:18	306:8 329:8 393:5	submitted 303:4
251:16,17,25	380:18 389:5,8,	449:3,10	subpart 415:19
263:14 276:7	12,14,15,18 390:8	study 248:15	
294:17 295:7,17,	391:3 392:22,23	249:19,20 250:3,7	subparts 384:8
23 296:6 298:10	397:2 418:22	251:5,24 252:10,	subscriber 291:14
313:19,24 325:15	456:22 465:2,10	11 259:6 261:2,4	subscription
384:25 385:10	476:19,20,25	263:20 264:4,7,	289:16
457:16	ctinulations 242:0	13,22 270:22	
statements 256:2	stipulations 342:9 348:20 362:20	284:3 297:25	subsequent
statements 256:2, 7 295:22 436:24		302:19,23 303:20,	417:17
	stop 476:14	25 304:5,11,14,18	subset 365:6
states 277:25	straight 292:23	305:21,24 306:6,	377:18
287:18 292:6	320:21	9,11 308:13	subsets 259:6,9,
295:17 336:21		326:12 327:5,15	10 Subsets 259.6,9,
stating 274:3	straightened 310:6	328:4,5 329:20,24	
344:24 365:22	310.0	330:24 331:6	substantial 301:2,
463:6	strange 269:23	346:17,18 353:20	10 460:8
status 330:9,15	strategy 401:25	355:10,25 356:6,	substantially
378:1,23		7,11 357:2 358:22	244:22 300:23
·	stress 272:21	360:4 366:5,10,	339:17 400:7
statute 465:24,25	strike 472:10	12,14 375:14 380:1,5,10,19,24	412:21 428:7,8
466:6	473:2,5,13,15,22,	381:4,8,9,14,17,	450:22 460:15
statutes 300:14	25 474:4,14,21	19 382:11,14	
Statutes 300.14			

11,18,22 311:6

	Evidentia	iy nearing January 31,	2024ITIQEX. Substantiveter
substantive	support 341:25	360:6,7 362:6	380:13 381:10,14
467:11	342:1 376:16	374:8 375:7	391:12 392:10
substations	382:4	376:7,9 381:11	393:18 394:18
360:15	suppose 429:8	382:14 389:2	397:21 398:10,16
		394:4 395:5,6	417:6,7 430:9
substitute 412:11,	supposed 260:25	418:5 454:5	434:18 435:25
12 476:3	261:1 475:23	465:12	437:5 449:1 452:5
subsumes 377:12	surprise 385:9	systems 299:24	453:19 456:16,17,
subtransmission	386:2 439:20	300:1 332:17	19 457:17 458:12
283:20	surprised 347:9	352:5 354:22	461:13,23 462:2
	385:16	362:6 437:20	464:18 467:23
sufficient 371:4		455:12 464:23	471:16
419:2,5 475:21	surprising 385:19		talks 456:24
suggest 470:25	surrebuttal 244:24	Т	tangentially 254:8
473:12 474:6	245:1 280:23		
suggested 305:20	354:5 409:7	table 362:16 422:1	tariff 243:20 248:12 281:17
	422:15 469:21,24	452:6	289:17 321:25
suggesting 310:14 313:4	472:24	taking 279:22	427:20 429:2
310:14 313:4	survey 252:1	280:10 329:12	439:1,5,10,23
suitable 346:24	suspect 275:1	373:5 470:7	447:13 451:3
sum 295:18 296:2	391:20	473:12	461:2 476:24
298:13 301:2,10			
317:9 359:25	sustained 397:25	talk 253:17 270:22	tariffs 249:14
375:6 385:12	440:21	307:13 323:4	291:6,13,14 375:2
418:6	swear 243:1 399:2	343:12 345:18	438:11 439:21
	411:1 427:2	346:2 355:19	461:3,5,6
summaries 280:5	switch 371:2	371:2 372:15 373:17 393:8	tasked 431:7
summarize 314:8		414:10 415:10	technical 258:23
summarized	switchers 417:4,	462:7 468:21	346:4
276:7	10 418:18	478:1	
summarizing	switching 368:23		technique 351:12
338:10,12 341:25	402:20 417:13	talked 267:23	technology
	418:1,4	305:15 347:1	337:21
summary 285:7	sworn 243:9 256:7	349:11 376:23 396:19 419:23	teens 332:12
summation	399:10 411:8	420:25 455:14,15	tells 449:12
364:22	427:10	459:23	
summations	symmetric 436:2	talking 246:2	temperature 297:6
397:4	437:3	249:2 255:15	322:5 403:14,23,
oummed 270:11		272:3 282:22	24 405:23 406:17,
summed 372:11,	system 257:16	290:3 296:18	18 409:16
	261:21 263:17	290.3 290.16	temperatures
summer 284:25	265:20 299:19,23	313:25 316:6,8	403:17,18 405:21
285:2 409:19	302:19,23 315:3	328:23 329:21	ten 252:9,11
supply 333:5	326:2 327:7,25	333:9 336:13,15	304:21 308:6,8,
334:2	328:13 329:22,24	365:1 368:25	11 18 22 311.6

330:1,13 357:12

365:1 368:25

334:2

		, 3	, , , = = =
322:10,16 332:25	testimony 242:10,	432:21,25 433:1	361:25 368:16
371:3 384:1,2,22	12 243:2,21,22,25	434:6,14 435:9,	370:11,21,22
467:11	244:6 245:12,18,	19,20 436:1	379:12 383:14
tomal 000:40	20,24 246:25	438:18,20,23	387:24 390:22
tend 263:16	247:2 252:21	443:20 444:7,9,22	392:3 395:6
348:21	254:1,3,10,23,24	447:9 454:19,20	396:11,13,17
tender 245:7	255:23 257:22	455:23 457:13,23	405:2 406:1
246:17 400:13	261:24 262:4,20	459:8 461:20	414:12 429:10
413:2 428:13	263:3 271:16	462:7,16 463:15	436:10 439:17
tendered 400:19	272:24 273:4	464:4 465:5	441:19,21 442:20
413:8 428:19	274:18 276:6	468:16,17 469:13	446:21
	282:5 284:14	470:13,16 471:17,	(l-!l-! 040.0
tens 403:4	286:10,12,18	24 472:2,5 473:16	thinking 318:9
term 264:25 331:5	296:10,13,15,19	474:17 476:2	334:6 337:10
356:2 366:3	298:8 299:1,7,9	477:11,15	457:18
376:3,6 381:9	301:13,15 305:22	·	thinks 254:9 267:6
435:14 456:21	306:6 309:17	theoretical 436:1	390:24 436:15
458:20	312:23 313:10	theory 371:20	thought 245:14
	314:7 315:8,14,25	375:13 383:23	261:22 262:5
termed 323:7	316:4,9,13,20	409:14	286:11 306:18
372:22 374:3	318:15,18 324:17	thermodynamic	314:20 346:5,11
terminology	325:17,23 326:24	405:19	347:2,7 357:16
353:14	328:15 330:23		388:24 390:2
terms 265:19	331:6 334:13	thing 246:2 254:18	425:9 457:12
360:3,7 369:7	335:25 341:10	255:6 259:14	465:4 468:16,17
422:12	345:1,15,21,22	261:3 265:1,5	·
	346:23 349:10	270:14 305:13	thousand 358:5
terribly 266:22	354:6,18,20 356:2	332:1,8,11 335:17	397:8
443:19	357:18 358:1	344:8 347:14	thousand-ish
test 351:9 353:9,	359:1,18,22	348:3,22 360:23	358:16
25 416:9 418:8,12	360:19 362:4	361:9 377:1 379:3	throughput
455:18 457:19	365:1,3,5,7 366:4,	397:6 421:6	368:16
463:14 464:6	25 367:11,12	453:25	300.10
testified 243:9	374:19 377:11	things 248:4,6	throw 251:4 356:1
250:25 282:25	378:21 383:9	250:6 252:1,17	throwing 289:18
283:5,22 284:21	385:15,20 386:4,	265:11,13,21	370:20 383:12
310:15 343:5	10 390:17,18	274:23 279:2,3	
355:8 387:3,23	398:2,21 399:3,	282:21 288:9	thrown 357:18
399:10 409:7	21,22 401:6	294:12,15 303:5	tie 374:13
411:8 416:22	407:21 411:2,19,	304:13 306:25	tied 309:22 310:11
427:10 436:23	20,21 412:17,20	314:8,10 326:13,	335:19 444:12
	414:8,10,21	14 331:1 332:24	446:3
testify 289:12	415:16 416:18	338:5 339:14	
311:20 437:19	417:12 418:23	340:1 342:25	tighter 331:8
testifying 250:22	419:4,13 421:13	343:14 348:10,11,	time 242:17 245:1
252:15 313:16	423:12 427:3,22,	16 350:24 354:22	249:3 250:5
441:14	23 429:11 430:24	355:10 356:4	259:19 263:16,18

		y nearmagidary 31, 2024illa				
264:9 269:19	timely 454:24	368:23 384:22	true-ups 266:18			
278:24 281:18,19	456:15	385:4 404:25	truth 243:2 399:3			
292:8 293:5 304:3	times 422:10,23	torn 470:3	411:2 427:3			
309:17 325:22	446:19 455:17	total 256:14,16	tune 395:16			
329:9 330:6,16	timing 266:12	267:17 307:19				
332:2 333:19	268:9 375:8	363:4,12,13	turn 255:13 273:6,			
335:6,21 336:22 342:9,21,24	414:18 421:14	372:10,11 394:2	15 284:13 287:17			
343:14,21 344:10,	422:16 463:20	405:11	295:9 301:18			
18,22 345:21	464:12		313:9 319:5 401:5			
346:1,25 347:5		totaled 406:24	407:14 468:7			
348:20 351:18	tiny 378:8	TOU 408:10,11	turned 308:2			
352:1,4 353:4,5,	title 243:18 381:1	touch 461:19	323:20 343:24			
21 354:22 355:1,	today 242:2,15		359:4 393:14			
3,13 357:15	244:25 256:1	touched 328:22	turning 275:9			
362:18 367:10,11	257:25 265:6	touted 459:18	338:20			
368:18 373:5	276:21 288:24	track 264:2	tving 200:25			
375:18 377:22	289:2 290:15		tying 309:25			
383:16 388:6	291:17 313:16	transactions	type 263:23,25			
393:14,16,20	315:10 341:1	335:6 360:9	271:6 339:13,20			
394:11,12 395:11,	343:23 345:14,19	transfer 405:20	340:4,5 347:14			
12 396:20 398:1,	350:25 351:1	transformer	456:18 468:5,6			
17 402:11,18	356:24,25 367:17	295:12 303:8	types 392:25			
403:6,14 406:3	384:3 395:1 398:2	314:15 388:10,12,	typically 249:19			
408:24 409:17,21	399:3 400:6	18	303:9 326:14			
410:1 414:23	424:25 425:2	transformers	353:10 378:21			
415:11 417:15,19,	428:6 441:9	252:4,10 384:1	393:17 396:14			
24 421:11,20,24 440:1 441:4,21	442:13 452:1	388:19	403:22 409:18			
455:22 456:1,3,6,	465:1 477:21	transition 464:9,	421:12 442:20			
13 457:1,2,9,15	1 100 445'5		455:18			
458:4,18 459:24	told 323:3 342:23,	18	typographical			
460:5 462:15	24 346:25 429:24	transmission	typographical 320:25			
463:18,19 464:2,	463:2	283:19	320.23			
13,18 465:17	Tom 396:2	treat 350:7,10				
467:14,22 475:21		387:7	U			
476:5,12 478:24	100000000000000000000000000000000000000		Uh-huh 359:6			
time-based	ton 346:9,10	treatment 336:12				
352:13 404:11,19	troi troi		ultimate 349:8,9,			
		true 245:3 400:9	14,20,25 382:17			
timeline 252:18	top 260:4 277:25	403:12 412:23	466:3,17			
254:14 290:15	403:3 415:12	416:7 428:9 435:5	Ultimately 383:1,7			
336:16,19 349:15	416:2 477:14	442:19	umbrella 381:8			
timelines 323:14	topic 255:3 306:11	true-up 416:10				
352:11	381:20 444:21	456:5,6 464:11	unable 364:20			
timeliness 457:12 458:8,10	topics 287:5 366:1		unavailable 373:5			

	Evidentiar	ry Hearing January 31, 2	024Index: unbiasedversus
unbiased 300:6	unduly 250:2	453:8 457:2	360:5,10 361:5
446:16,18	264:23 266:3	470:23,24	363:23 368:13
unclear 358:12	350:3 367:7	updates 263:16	372:6 375:7
uncieal 330.12	382:16 388:7	417:17	376:10,12 390:24
uncommon	452:15		396:9 408:3
266:22 350:7	unfortunate 371:6	usable 266:14	419:19 434:8
underground	umortunate 371.0	usage 244:13	435:10 436:3
303:7 314:25	unhelpfully	257:2 266:20	441:18 444:18
	361:22	333:19 335:21	445:11,21,23
underlying 442:6	unique 261:15	340:23 342:20	447:11 448:22
474:18	266:16,24 307:17	349:17 353:8	449:15 462:8,21
understand	363:15,21 365:12	354:12 367:14,20	utility's 332:1
252:18 253:15	392:11,13	375:12 376:21	375:13
254:20 257:14	·	377:9 394:12	373.13
259:1 260:9	unit 326:14 327:3	396:23 397:10	utilize 419:20
263:11 265:4	396:11	402:17 404:10,18,	utilized 325:17
266:7 283:2 284:6	units 326:18	19 409:20 414:22	326:16
289:11 315:16	uniugt 250:2	418:6 424:22	020.10
359:7 370:14	unjust 350:2	425:6 455:14	
381:16 383:8	unjustly 250:2	456:17	V
397:9 406:10	350:3 388:7		vecetion 200:0.15
431:11 435:15	unlawful 368:21	usefulness 258:25	vacation 286:9,15 373:6
437:3 438:10		USOA 362:15	373.0
442:3 443:23	unmute 459:1	utilities 250:23	vague 331:7
454:4 464:3	unorthodox 398:4	266:14 276:21	447:22,23 448:3
understanding	unreasonable	277:19 279:1	449:21
244:7 247:15	350:3	280:6 287:20	vagueness 339:16
252:20 266:18		305:21 326:3,21	449:25
269:8 279:9	untethered 455:12	328:1 333:4,6	valuable 200:21
282:8,11 332:4	untimely 457:16	334:12 338:13,16,	valuable 390:21
346:7 366:15	unusual 386:17	18 339:18 341:11,	values 331:17
369:1 378:13		14 348:21 355:12	332:23
396:24 407:6	unusually 350:9	360:11 366:22	variation 350:17
408:3 440:2	unwilling 323:1	370:6,9 376:8	
473:18 478:23	upcoming 402:10	380:11 440:3,12	variations 376:9
understood	464:5	441:5,21 442:1,19	varies 326:20
296:12 351:24		459:21,22 461:9	vary 250:5 287:23
356:10 385:20	update 263:23,24	462:4 465:16	
389:5,7 433:18	266:15,16,18,25	utility 266:23	vendor 396:10
,	331:1,19 353:24,	267:20 276:24	verification
undertake 313:12	25 354:1,4 416:9	278:25 280:18	317:21
315:11 434:12	455:19 456:3	287:21 289:9	version 244:8
435:14,23	457:22 458:5,11	299:18 300:16	245:21 274:11
undertaken	463:6,17 464:9	326:4,7,8,23	286:23 476:13,14
391:19	475:19	327:1,6 348:25	·
undertaking 330:4	updated 332:3	353:12 354:3,11	versus 250:3
			283:19 288:11

307:11 322:4	voluntarily 389:13	368:15 371:22	381:23 423:13
328:2 343:17		375:11,12 401:9	434:3 441:15
349:17 365:15	volunteering	402:13,18,22,23	448:8 450:4
367:2 369:2	245:16	403:9,12 404:5,6,	453:24 469:23
370:16 371:3	volunteers 315:22	8,9,17,23,25	
374:8 396:16		405:1,2,4,5,6,7	withhold 462:9
436:1 437:3	W	406:7,11,12,13	witnesses 242:6
462:20		407:22,25 408:4,	337:11 356:22
	wait 259:22,24	9,21 409:8,22	366:17 397:12
view 248:23	358:14	418:16 424:24,25	467:4
261:21 263:15,19,	330.14	426:7	
25 264:10 285:7	waiting 287:11		word 244:15
323:7 360:13	315:21 384:15	Webex 454:14	249:19 273:18
367:6 438:5,14	walk 247:14	459:2	277:23 288:6,7,8
447:12,13	418:11	Wednesday	290:8 292:14
views 263:16		477:22	301:5 380:4 389:9
284:23 292:6,8,	walking 357:15		411:24
14,15,16 461:10	wanted 247:4	weeds 404:4	worded 348:18
	251:18 264:3	week 246:7 306:20	362:24 378:18
violate 273:20	269:10 310:10	324:23 477:21	wording 251:3
violated 321:7	323:25 334:9	weeks 290:1,17	339:14 355:15,18
violating 201:11	363:2 371:12	323:19 348:5	356:3 453:3
violating 281:11,	424:1 426:25	367:18 416:20	300.5 405.5
14	432:6 463:10	307.10 410.20	words 302:7 304:1
violation 350:4	465:13 478:16,17	weigh 312:13	349:22
virial 314:11	·	421:25	work 251:20
	wanting 424:18	West 262:5,13,25	308:10 313:8
visible 307:1	war 371:7	263:1 265:25	317:5,19 326:7,9
vision 275:24	warning 364:3	335:3 352:18	328:15 330:17,19
294:8,9	_	360:8 363:5	332:13 335:17
voice 260:7	waste 293:4	365:15 391:14	360:19 366:21
	362:18 383:15	392:2,8,15	417:1 418:5 478:6
volt 257:5 303:11	wasted 306:21	West's 295:11	worked 255:15
voltage 252:2,12	Waterhouse	360:6 370:8	273:19
257:20 258:12	273:1,9,13	391:23	
282:10 283:6,17,	, ,		worker 304:24
22 303:6,7	watermark 476:16	Weststar 335:6,19	workers 305:13
314:10,18,24	ways 251:11,23	wherefore 319:6,	
329:1 331:14	315:2 317:11	13,14,15	working 334:11 341:15 395:18
342:17 350:8	329:16 331:9,10	whichever 247:20	
357:5,7 360:25	356:5 382:8	willChever 247.20	409:1
361:1,3 373:20,23	433:2,3	white 413:18	works 421:15
374:3,11,17 387:8	weather 261:3	wholesale 376:12	workshop 254:7
388:3,14 395:7,9	266:21 343:7,9,10		280:4 372:22
415:23 416:4,10	350:23 351:5,10,	wise 350:4	395:23,24 430:19
voltages 257:13	14,15,20,21 352:1	withdraw 304:17	·
415:20	353:15,20 358:22	311:7 321:20	workshops
	000.10,20 000.22		

	Evidentiar	y Hearing	Janua
254:13 395:19	years 264:16		
world 343:22	294:14 308:8,11,		
	18,22 323:15		
	328:5,17 332:21,		
worried 408:18	22,25 333:16		
worse 352:22			
worth 308.8 18 22			
	·		
	·		
wrapping 426:20			
write 288:15	457:19		
391:21	years' 358:21		
writing 448:11	yesterday 242:9		
477:23	244:6 245:16		
	248:18 251:10		
	252:15 256:2,24		
325:23	257:18 264:12		
wrong 258:5	265:1 269:6		
279:4,9 292:14	271:16 273:18		
327:13 351:3	274:20 284:13		
353:14 370:10	294:19 306:19		
452:16 463:3	307:14 312:23		
wrote 288:12	327:11 328:22		
367:11	330:22 335:25		
	338:5,7,10 341:22		
Υ	·		
YYY 331·18			
XXX 331.10			
	397:17,18,22,23		
Y			
voor 249:10	Z		
•			
	zip 259:14 260:15		
	zoning 468:2		
′			
′			
464:6			
year \$ 338.20			
	world 343:22 347:18 421:1 worried 408:18 worse 352:22 worth 308:8,18,22 331:25 358:13,18, 21 404:5 wrapping 426:20 write 288:15 391:21 writing 448:11 477:23 written 314:7 325:23 wrong 258:5 279:4,9 292:14 327:13 351:3 353:14 370:10 452:16 463:3 wrote 288:12 367:11 X XXXX 331:18 Y year 248:10 255:19 267:20 306:22 328:16 351:1 352:10 353:9,25 357:6 367:16 371:25 372:2 394:3 401:15 416:9 418:8,12 449:9 455:18 463:14	world 343:22 347:18 421:1 years 264:16 294:14 308:8,11, 18,22 323:15 328:5,17 332:21, 22,25 333:16 328:5,17 332:21, 22,25 333:16 335:20 352:5 371:3,4,7,8,9,12 335:20 352:5 371:3,4,7,8,9,12 380:19 382:11,12 403:21 404:5,8 405:3 407:24 408:1 440:2 449:9 457:19 457:19 years' 358:21 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21 years' 358:21	world 343:22 347:18 421:1 worried 408:18 worse 352:22 worth 308:8,18,22 331:25 358:13,18, 21 404:5 wrapping 426:20 write 288:15 391:21 writing 448:11 477:23 writen 314:7 325:23 wrong 258:5 279:4,9 292:14 327:13 351:3 353:14 370:10 452:16 463:3 wrote 288:12 367:11 X XXXX 331:18 Y year 248:10 255:19 267:20 306:22 328:16 351:2 349:3 401:15 416:9 418:8,12 449:9 455:18 463:14 464:6

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light Company's Request for Authority to Implement A General Rate Increase for Electric Service))	Case No. ER-2018-0145
In the Matter of KCP&L Greater Missouri Operations Company's Request for Authorization Implement A General Rate Increase for Electric Service) to))	Case No. ER-2018-0146

NON-UNANIMOUS PARTIAL STIPULATION AND AGREEMENT CONCERNING RATE DESIGN ISSUES

COME NOW Kansas City Power & Light Company ("KCP&L"), KCP&L Greater Missouri Operations Company ("GMO") (collectively the "Company"), the Staff of the Missouri Public Service Commission ("Staff"), the Office of the Public Counsel ("OPC"), Advanced Energy Management Alliance ("AEMA"), Missouri Division of Energy ("DE"), Missouri Joint Municipal Electric Utility Commission ("MJMEUC"), and Renew Missouri Advocates ("Renew MO") (collectively, "Signatories") by and through their respective counsel, and for their Non-Unanimous Partial Stipulation and Agreement concerning rate design issues ("Rate Design Stipulation"), respectfully state as follows to the Missouri Public Service Commission ("Commission"):

AGREEMENTS

1. SETTLEMENT OF SPECIFIC ISSUES

This settlement resolves the following issues on the September 18, 2018 Corrected List of Issues filed in this case: Load Research (II); the following issues in Rate Design/Class Cost of Service (III) (Time of Use Residential Rate Design); Tariffs (IV); Riders (V); Indiana Model (VI); Third Party Charging Stations (VII); and Distributed Energy (VIII). As such, the parties do not believe that it is necessary to hear these issues as beginning on September 24, 2018.

2. <u>TIME OF USE RATES</u>

- a. The Signatories believe this Rate Design Stipulation defines a meaningful and successful process to establish alternative rate plans in the form of Time of Use ("TOU") rates for residential customers following accepted best practice and ensuring measured impact to customers within the class. The Company believes TOU rates should be part of a broad selection of rates offered to Customers and utilized to help the Company provide an opportunity to Customers to shift demands from peak periods and benefit from that shifting load. Further, TOU rates allow the Company and Customers to extract additional benefit from recent upgrades in metering and billing systems.
- b. Effective October 1, 2019, KCP&L and GMO will offer a residential Time of Use Service, originally proposed¹ as pilot by the Company in this case, as an opt-in rate that would be available as an alternative to standard residential rates, which shall continue to be available.
 - i. The TOU opt-in rate will remain in effect until changed by Commission order.
 - ii. Customers who take service under the TOU opt-in rate and switch back to a standard rate will be required to wait 12 months before they will be eligible to re-enroll in the TOU opt-in rate.

_

¹ The Signatories use the phrase, "originally proposed," for the purpose of identifying the residential TOU pilot; however, the use of this phrase does not include, and specifically excludes, the KCP&L and GMO's proposals relating to combining TOU with MEEIA.

- c. The Company will develop a comprehensive customer research, education and marketing plan and identify the Company readiness and outreach capabilities and resources required to introduce the TOU rate plan to residential customers.
 - i. By the end of Q4 2018, the Company will meet with Staff, OPC, DE and Renew MO (stakeholders) to review the customer research plan.
 - ii. By the end of Q1 2019, the Company will launch the customer research plan.
 - iii. The Company will evaluate leading practices on customer education and engagement on TOU deployment. During Q2 2019, the Company will develop a marketing and education plan and will meet with stakeholders to review.
 - 1. The Company will develop a plan that may include various forms of tools, marketing, and customer education such as mailings, outbound calling, text messaging, website information, media outlets and outreach through various company partners including community action agencies, senior housing centers and others.
 - The plan will include marketing to specific end-uses that might benefit from the TOU rate plan, such as Electric Vehicle charging and space conditioning.
 - 3. The Company will address the potential impact to the customer contact center and training that will ensue to properly address customer questions. The Company will

provide all call center personnel with effective and sufficient training and education on their TOU offering. Company shall evaluate opportunities to educate new customers requesting service on the availability of a TOU as well as other educational opportunities when existing customers call the contact center for other matters, including TOU education through an Interactive Voice Recognition ("IVR").

- 4. The plan will address how to approach vulnerable customer segments, such as low-income customers, elderly customers and customers with electricity-dependent medical needs.
- 5. Education on the merits of the TOU opt-in rate plan, both specific to the customers taking service thereunder as well as to customers at large, will continue throughout the offering of the TOU opt-in rate plan.
- 6. The Company will work with stakeholders to operationalize the customer journey from first learning about the TOU rates, to enrolling/un-enrolling, receiving the first bill and managing their energy usage going forward
- iv. The Company will develop a process to solicit feedback from customers availing themselves of the TOU rate and those who do not avail themselves of such rate to determine program success and opportunities for improvement. This is referred to as "Customer

Feedback Mechanism". This process shall be developed with stakeholder input. The Company will keep customer documentation and records on all customer feedback to the degree possible regarding its post-implementation of TOU in a format that can be shared with stakeholders upon request.

- End of Q4 2018, discuss with stakeholder options for Customer Feedback Mechanism.
- End of Q2 2019, finalize draft of Customer Feedback
 Mechanism and share with stakeholders.
- 3. End of Q4 2019, finalize Customer Feedback Mechanism and plans for implementing the mechanism, and share with stakeholders.
- v. The Company will develop, with stakeholder input, metrics to gauge changes in customer behavior. This is referred to as "Customer Behavior Metrics."
 - End of Q4 2018, discuss with stakeholders options for Customer Behavior Metrics.
 - 2. End of Q2 2019, finalize draft of Customer Behavior Metrics and share with stakeholders.
 - 3. End of Q4 2019, finalize Customer Behavior Metrics and share with stakeholders.

- vi. Company will develop a business case for implementation of shadow billing feasibility, with the goal of implementing shadow billing for all residential customers.
 - End of Q4 2018, Company will review draft plan of shadow billing with stakeholders.
 - End of Q1 2019, Company will finalize business case for shadow billing and share with stakeholders to define next steps.
- vii. Education on the merits of the opt-in rates, both specific to the customers taking service thereunder as well as to customers at large, will continue from the dates addressed herein until the Company's next general rate cases.
- d. The Company will provide details of the education, marketing and outreach efforts, and customer TOU subscription numbers to the Commission at an on-the-record presentation in December 2019 and September 2020.
- e. When completed the Company will submit to the Commission the following documents on an ongoing basis: Customer research plan, business case for shadow billing, marketing and education plan, EM&V plan, Customer Feedback Mechanism, Customer Behavior Metrics, EM&V interim and final results and documentation shared at each stakeholder meeting.
- f. Company will meet with stakeholders by the end of Q1 2020 and end of Q1 2021 to discuss number of customers on TOU rate plan; changes in customer behavior including shift demands from peak periods and benefit

from that shifting load; education effectiveness; customer feedback and questions; observations from summer vs winter rate impacts. Nothing precludes any stakeholder from making a filing with the Commission should it believe the Company is not actively providing reasonable outreach and education to their customers or other concerns regarding TOU deployment. Nothing prevents the Company from opposing any such filing. If by December 31, 2019 KCP&L and GMO do not have at least 750

- g. If by December 31, 2019 KCP&L and GMO do not have at least 750 customers per company signed up for the TOU service, stakeholders will discuss and consider changes to the education and outreach plan or changes to program design necessary to enhance enrollment.
- h. If KCP&L and GMO have not gained at least an additional 1000 customers per company by December 31, 2020, stakeholders will review education and outreach plan and program design changes necessary to enhance enrollment.
- i. By June 30, 2020, KCP&L will file a rate design case limited to TOU issues.
 For GMO, signatories further agree the September 20, 2016 Non-Unanimous Stipulation and Agreement in ER-2016-0156 will be expanded to include TOU, with the TOU rate design case to commence by June 30, 2020.
- j. KCP&L and GMO will submit a Residential TOU rate design in their next rate cases based on lessons learned from the TOU service.
- k. Company will complete an EM&V Report by December 31, 2021.

- 1. End of Q2 2019, review draft of EM&V plan with parties and solicit feedback on parameters and methodology.
- 2. End of Q4 2019, finalize EM&V plan with parties.
- 1. KCP&L and GMO shall be authorized to defer for recovery prudently incurred program costs (representing the prudently incurred work detailed above and including marketing, education, evaluation and administration costs) associated with the TOU service. In the next rate case, KCP&L and GMO shall be authorized to recover prudently incurred program costs at the level represented by the percentage of customers enrolled in the TOU service at the time of filing of the rate cases compared to the above target level, not to exceed 100% recovery of costs. KCP&L and GMO will demonstrate that such percentage is not simply a result of transferring customers to a lower rate, but based on efforts directly related to changing customer behavior through marketing and education.

3. **RESIDENTIAL RATE DESIGN**

a. GMO

In the event the Commission orders an increase to residential revenue, the parties have not reached an agreement on the appropriate residential rate design.

In the event the Commission orders a decrease to the residential revenue, Parties agree to a Residential Customer Charge of \$11.47. The remaining decrease, if applicable gets spread to remaining rate element charges in the following manner:

Step 1: Increase tail block MORH and MORNH to \$0.05005.

Step 2: Decrease MORG, MORN, MORH, MORNH first block winter to \$0.09990, or until Residential revenue target is met, whichever occurs first.

Step 3: Any remaining decrease gets applied as an equal percent to all summer rate blocks, MORO, and first block winter for MORG, MORN, MORH, MORNH. No changes will be made in this step to winter blocks 2 and 3.

b. KCP&L

In the event the Commission orders an increase to residential revenue, the parties have not reached an agreement on the appropriate residential rate design. If no revenue change or a reduction in revenue is ordered for the Residential class, the parties agree to the rate designs indicated below applicable to the revenue levels indicated. The Signatories agree that parties can argue, and the Commission can order, a rate decrease for residential customers other than 2.39%, 1%, 0.5%, or \$0. For revenue reductions between the revenue levels indicated below, the charges will be interpolated, in a manner consistent with the table below, to collect the appropriate revenue level. For revenue reductions below the lowest revenue level indicated on the table below, the non-customer charges will be adjusted by an equal percentage.

		Current Rates		Residential Class at Approx. 2.39% Decrease		Residential Class at Approx. 1% Decrease		Residential Class at Approx. .5% Decrease		Residential . Class at Approx. 0% Decrease	
RESIDENTIAL	\$ 33	8,392,590	\$ 3	30,294,806	\$ 33	4,855,768	\$ 33	6,689,356	\$ 33	8,374,383	
CUSTOMER CHARGE											
One Meter - 1RS1A, 1RSDA, 1RS1B, 1RS6A, 1RFEB, 1RO1A	\$	12.62	Ś	11.47	Ś	11.47	Ś	12.07	Ś	12.62	
Two Meters - Standard - 1RS2A, 1RS3A, 1RW7A, 1RH1A	Ś	14.95	Ś	13.80	Ś	13.80	\$	14.40	Ś	14.95	
Two Meters - Additional	Ÿ	14.55	Ÿ	13.00	Ÿ	13.00	Ÿ	14,40	Ÿ	14.55	
ENERGY CHARGE											
Summer Rate											
Summer Gen - 1RS1A, 1RSDA, 1RS1B,											
0-600	\$	0.12893	\$	0.12747	\$	0.12893	\$	0.12893	\$	0.12893	
600-1000	\$	0.14916	\$	0.14747	\$	0.14916	\$	0.14916	\$	0.14916	
1000+	\$	0.14916	\$	0.14747	\$	0.14916	\$	0.14916	\$	0.14916	
Summer Space - 1RS6A, 1RFEB, 1RS2A, 1RS3A, 1RW7A, 1RH1A											
0-600	\$	0.13806	\$	0.13650	\$	0.13806	\$	0.13806	\$	0.13806	
600-1000	\$	0.13806	\$	0.13650	\$	0.13806	\$	0.13806	\$	0.13806	
1000+	\$	0.13806	\$	0.13650	\$	0.13806	\$	0.13806	\$	0.13806	
Winter Rates											
Winter Gen - 1RS1A, 1RSDA, 1RS1B,											
0-600	\$	0.12231	\$	0.11864	\$	0.12186	\$	0.12186	\$	0.12186	
600-1000	\$	0.07396	\$	0.07396	\$	0.07396	\$	0.07396	\$	0.07396	
1000+	\$	0.06561	\$	0.06454	\$	0.06561	\$	0.06561	\$	0.06561	
Winter Gen&S/H - 1RS2A, 1RS3A, 1RW7A, 1RH1A											
0-600	\$	0.12412	\$	0.11864	\$	0.12186	\$	0.12186	\$	0.12186	
600-1000	\$	0.07441	\$	0.07396	\$	0.07396	\$	0.07396	\$	0.07396	
1000+	\$	0.06219	\$	0.06346	\$	0.06445	\$	0.06445	\$	0.06445	
Winter Gen&S/H - 1RS6A, 1RFEB											
0-600	\$	0.09703	\$	0.09593	\$	0.09703	\$	0.09703	\$	0.09703	
600-1000	\$	0.09703	\$	0.09593	\$	0.09703	\$	0.09703	\$	0.09703	
1000+	\$	0.06098	\$	0.06300	\$	0.06300	\$	0.06300	\$	0.06300	
Sep Space Heat Mtr - 1RS2A, 1RS3A, 1RW7A, 1RH1A											
Winter	\$	0.06239	\$	0.06346	\$	0.06445	\$	0.06445	\$	0.06445	
Gen/Other Use - ROU											
Winter	\$	0.13933	\$	0.13776	\$	0.14149	\$	0.14149	\$	0.14149	
Summer	\$	0.17931	\$	0.17728	\$	0.18209	\$	0.18209	\$	0.18209	
T-O-U (RTOD)											
Customer Charge	\$	15.94	\$	15.76	\$	16.19	\$	16.19	\$	16.19	
Summer On-Peak	\$	0.21173	\$	0.20934	\$	0.21501	\$	0.21501	\$	0.21501	
Summer Off-Peak	\$	0.11796	\$	0.11663	\$	0.11979	\$	0.11979	\$	0.11979	
Winter	\$	0.08719	\$	0.08620	\$	0.08854	\$	0.08854	\$	0.08854	

4. **RESTORATION CHARGE**

Company withdraws its proposal to add language to the Rules & Regulations establishing a Restoration Charge.

5. **SPECIAL CONTRACTS**

Signatories accept Company position as offered in the direct testimony of Marisol Miller and agree to add language reflecting consideration of incremental cost analysis data as described in the

Economic Development Rider (KCP&L-Sheet 32I and GMO Sheet 123.5) to Special Contracts tariff.

6. **REAL TIME PRICING & TWO PART TIME OF USE**

- a. The Company's RTP tariffs and Two Part Time of Use tariffs will continue and will not be available to new customers.
- b. The Company will work with interested parties to develop RTP or similar tariff that is compatible with billing system by its next rate case.
- c. KCP&L will remove RTP Plus tariff from its tariff.

7. <u>LINE EXTENSION TARIFF-UNDERUTILIZED INFRASTRUCTURE</u>

The Signatories agree that the specimen Line Extension-Underutilized Infrastructure tariffs, attached as Exhibit A, should be approved by the Commission.

8. <u>LINE EXTENSION TARIFF-EV MAKE READY</u>

- a. The Company agrees to establish and offer a standard construction allowance within the line extension process for EV "make ready" facilities.
- b. The Signatories agree that KCP&L's and GMO's existing Line Extension tariff should continue with no additional make ready EV Definitions or Terms of Service.

9. OTHER RATE DESIGN-RELATED STUDIES

- a. The Company agrees to study alignment of billing seasons between KCP&L and GMO utilities.
- b. The Company agrees to work with Staff to define and retain billing determinants for future rate designs.

- c. The Company agrees to work with Staff to define data to support evaluation of the seasonal nature of demands on the transmission and distribution systems or the seasonal nature of the costs of capacity and energy to serve load.
- d. Dependent upon scope, timing and expertise needed, any resultant studies from (a), (b), and (c) above will be performed by Company personnel, if possible.
- e. The Signatories agree that Staff's proposal to assign facility extensions by class should not be adopted by the Commission.

10. **RENEWABLE ENERGY RIDER**

- a. The Company will deploy single Purchase Power Agreement ("PPA") for both KCP&L and GMO (minimum of 100MW and maximum of 200MW).
 All else equal, preference will be given for Missouri-based resource.
- b. The Company must demonstrate 90% subscription at the initial PPA level for a minimum of two years before additional renewable subscriptions are offered.
- c. KCP&L and GMO will file a separate tab in its FAC monthly reports showing the Renewable Energy Rider PPA's monthly operating data, costs, and revenues.
- d. The Signatories agree that any energy cost and net revenues (positive or negative) attributable to the unsubscribed capacity will be borne by shareholders. The reconciliation of any net revenues (positive or negative) will occur in the Fuel Adjustment Rate ("FAR") filings.

- e. The Company will revise its tariffs to add new jurisdictional terms recommended by the Company and incorporate a subscription charge into tariffs as recommended by Staff.
- f. The Signatories agree there will be no change to termination terms proposed by the Company in these cases.
- g. The Company will collaborate with Staff, DE, and OPC in the development of Frequently Asked Questions ("FAQs") and responses to be posted on the Company's website respecting the program prior to the solicitation of interest in subscribing to the Renewable Energy Rider.
- h. The Company will adopt program changes recommended in direct testimony of MECG witness Steve Chriss.
- The Signatories agree that the specimen Renewable Energy Rider tariffs,
 attached as Exhibit B, should be approved by the Commission.

11. SOLAR SUBSCRIPTION RIDER

- a. The Company agrees to seek competitive bids as two systems up to 2.5 MWs each to be located in each Missouri jurisdiction, or one system up to 5.0 MWs located in the most economic location, selecting the alternative with the lowest cost for implementation. The Company will retain all information related to bidding process, to be provided to Staff, DE and OPC. All else equal, preference will be given for Missouri-based resource in the event of the single system approach.
- b. The Company will receive commitment for subscription of at least 90% of the capacity for each facility before beginning construction.

- c. The Signatories agree that responsibility for any unsubscribed costs associated with the Solar Subscription Pilot will be shared between customers and shareholders with shareholders bearing 75% of the cost of any unsubscribed capacity and customers bearing the remaining 25%. Market priced energy associated with the energy of the shareholder unsubscribed portion will be included in the FAR filing to reflect the fuel portion of the net costs and revenues of the shareholder portion on any unsubscribed portion of the solar facility. KCP&L and GMO will file a separate tab in their FAC monthly reports showing the Solar Subscription Rider monthly operating data, costs, and revenues.
- d. The Company will consider building SB564-required solar at the same time/place with the understanding that that solar may be used for separate (low-income) projects per Non-Unanimous Stipulation and Agreement filed in these cases on September 19, 2018.
- e. The Company agrees the Solar Subscription Rider is a pilot program initially. The Company agrees to evaluate the pilot with any future KCP&L or GMO request for expansion of the Solar Subscription Rider or after five years of operation, whichever is first. Evaluation will include:
 - Recording of program costs and revenues (participants, all ratepayers, Company),
 - Numbers and types of subscribers (by rate class and participation by low and moderate-income customers),
 - 3. Annual surveys of participating customers covering (economic considerations and customer service),

- 4. Impact or benefits of the facility on the utility distribution system, and
- 5. Plans to site program expansion facilities in areas where distributed generation would benefit the electric utility's distribution system, such as areas where there is a potential to avoid or minimize distribution system investment.
- f. The Company will revise its tariff to add new jurisdictional terms as proposed by the Company, remove Levelized Cost of Energy ("LCOE"), update block charge and not to exceed value, rename interconnection charge to "Services and Access" charge, add update methodology as recommended by Staff. The price for solar block charge will be based on costs of project(s) selected through competitive RFP process.
- g. The Company will demonstrate 90% subscription of initially deployed system size for a minimum of two years before additional solar subscriptions are offered.
- h. To the extent program expansion occurs, the Company will seek balance between KCP&L and GMO territories.
- i. The Company shall submit reports to the Commission Staff, OPC, Renew MO, and DE detailing an evaluation of the program and lessons learned. Reports shall be filed quarterly until the first Pilot facility(ies) is/are fully constructed. Thereafter, a report shall be filed annually for the next four years. This sequence shall be repeated for construction of the next Pilot facility(ies), if applicable. Thereafter, reports shall be filed every three years until the Pilot facilities are retired.
- j. The Company will include on its website a list of Frequently Asked Questions ("FAQs") and the answers, including at a minimum but not limited to the questions

listed below. These FAQs shall be updated in a timely manner for all and any material changes to the answers, which may be necessary for the answers to remain accurate. Updates to the website FAQ shall be provided to the Signatories for review and comment prior to being made.

- Who is eligible?
- What does it cost?
- Do I own the panel?
- How much solar can I subscribe to?
- Where will the subscription solar be located?
- How big is the subscription solar?
- Will this make my rates go up (non-subscriber)?
- Is my payment for the solar eligible for a tax deduction/credit?
- What is the minimum participation period?
- What if I want to reduce/increase my shares?
- What happens if I drop off or move?
- What happens if I pass away?
- How is my bill calculated?
- How will this appear on my bill?
- How much can I expect my bill to increase?
- Will my bill be subject to additional increases in the future?
- Is it possible the cost of my bill will decrease as a result of my participation?
- What if the cost of solar decreases over the next twenty-years? Will my cost decrease?
- What is the fixed portion of my bill? Will it be the same every month if I participate?
- What are the surcharges on my bill? Will they be the same every month if I participate?
- Do I own the renewable energy credit (RECs) for my portion of this solar project?
- Does participation in this program qualify me as a net metering or cogeneration customer?
- Can I still participate in this program if I am currently a net metering or co-generation customer?
- Is the renewable energy I support through the Subscription Solar program delivered directly to my residence?
- Is there a calculator or spreadsheet I can use to help me determine my future expense?
- Am I eligible for the federal tax rebate known as the Investment Tax Credit?
- Who gets to claim the environmental benefits of this project?
- What if the system is sold out and I want to participate?

- How long will the community solar be in service?
- What panels, inverters and racking systems are being used in the array?
- How do I enroll?
- k. The Signatories agree that the specimen Solar Subscription Rider tariffs, attached as Exhibit C, should be approved by the Commission.

12. STANDBY SERVICE RIDER ("SSR")

- a. The Signatories agree that the SSR should include SGS Class with a minimum of 50 kW generation capacity, should exclude net metered customers, should have no minimum supplemental contract capacity, and should have no fixed charge other than administrative charge.
- b. The Signatories agree that the SSR should apply facility charge assessed against supplemental contract capacity.
- c. The Signatories agree that the SSR should be applicable to battery storage.
- d. The Signatories agree that the scheduling of maintenance service may be restricted by the Company. The Company shall receive and consider requests for maintenance service during all months and make reasonable accommodation of such requests (factors e.g., size of generator, time, duration, load forecast). The Signatories agree that maintenance service may be available during all months and shall not be greater than the seasonal standby contract capacity.
- e. The Signatories agree that supplemental contract capacity will be calculated as 90% of probable load adjusted for customer generation, i.e.,
 - = (Seasonal Peak x .9) Standby Contract Capacity

- f. The Signatories agree that the SSR's on- and off-peak hours are consistent with hours in LPS-1 rate class.
- g. The Company agrees to inform DE of new CHP customers.
- h. The Signatories agree that the specimen Standby Service Rider tariffs, attached as Exhibit D, should be approved by the Commission.

13. <u>DISTRIBUTED ENERGY RESOURCE ("DER") DATA RETENTION</u>

The Signatories agree to accept the Company position and allow the DER data retention topic be examined in the Commission rulemaking.

14. COMMERCIAL & INDUSTRIAL ("C&I") DEMAND RESPONSE

The Signatories agree that the Commission should approve compliance tariffs consistent with the exemplar tariffs in Schedule KHW-1, pp. 1-3 attached to the Supplemental Direct Testimony of Kimberly Winslow. Within 100 days of Commission-approved rates, KCP&L will issue a request for proposal for utility-approved aggregator(s) to administer customer participation in the Demand Response Incentive ("DRI") tariff. Final contracting with the utility-approved aggregator(s) will be contingent upon Commission approval of the DRI tariff. Also, within 100 days of Commission-approved rates, KCP&L will establish a transparent methodology (in consultation with stakeholders) for determining the capacity compensation under DRI.

15. **OTHER TARIFF CHANGES**²

- a. GMO
 - 1. Include Large Power Off Peak Rider as filed.
 - Adjust language in Primary Discount Rider to make available to all C&I customers as filed.

² The Signatories agree that the general tariff clean up items set forth in Schedule MEM-4 and MEM-7 (Miller Direct KCP&L and GMO testimony) will be made except for the items addressed herein.

3. Freeze existing Private Area Lighting as filed and add an Original Private Unmetered LED Lighting Service for both RES/NON-RES customers to replace current Private Area Lighting rate schedules.

b. KCP&L

 Freeze existing Private Area Lighting as filed and add an Original Private Unmetered LED Lighting Service for both RES/NON-RES customers to replace current Private Area Lighting rate schedules.

16. **LOAD RESEARCH**

a. For a future GMO rate case, the load research will reflect the new sample to reflect GMO consolidation.

17. **FAC**

- a. The Company will continue all FAC reporting requirements recommended by Staff in these cases.
- b. KCP&L and GMO will continue to provide the additional information as part of its monthly reports as KCP&L was ordered to do in Case No. ER-2016-0285 and as GMO was ordered to do in Case No. ER-2016-0156.

18. **ECONOMIC DEVELOPMENT RIDERS**

- a. The Company will file semi-annual reports documenting compliance with EDR tariffs and statutes.
- b. The Company will file with Commission the actual EDR contracts upon execution, with customer names and other customer identifying information redacted. Confidential versions will be provided to Staff, OPC, DE, MIEC,

- and MECG subject to execution of appropriate non-disclosure agreements by Staff, OPC, DE, MIEC and MECG.
- c. Filing of semi-annual reports will occur in the applicable SB 564 dockets including GMO, Case No. EO-2019-0045, and KCP&L, Case No. EO-2019-0047.

19. **OTHER**

The Company agrees that it will not seek a prepaid electric service program similar to that proposed by Ameren Missouri in File No. EO-2015-0055, as part of MEEIA before 2025. The Company agrees that if it files a stand-alone prepaid electric service program before 2025, it will meet with the Signatories three months in advance of the filing.

20. NON-SIGNATORY PARTIES DO NOT OPPOSE STIPULATION

The Signatories have been authorized to represent that the following parties, who have not executed this Stipulation, do not oppose Commission approval of this Stipulation:

- Midwest Energy Consumers Group ("MECG");
- Dogwood Energy, LLC ("Dogwood"); and
- Missouri Industrial Energy Consumers ("MIEC").

GENERAL PROVISIONS

- 21. Contingent upon Commission approval of this Stipulation without modification, the Signatories hereby stipulate to the admission into the evidentiary record of the testimony of their witnesses on the issues that are resolved by this Stipulation.
- 22. This Stipulation is being entered into solely for the purpose of settling the issues/adjustments in this case explicitly set forth above. Unless otherwise explicitly provided herein, none of the Signatories to this Stipulation shall be deemed to have approved or acquiesced

in any ratemaking or procedural principle, including, without limitation, any cost of service methodology or determination, method of cost determination or cost allocation or revenue-related methodology.

- 23. This Stipulation is a negotiated settlement. Except as specified herein, the Signatories to this Stipulation shall not be prejudiced, bound by, or in any way affected by the terms of this Stipulation: (a) in any future proceeding; (b) in any proceeding currently pending under a separate docket; and/or (c) in this proceeding should the Commission decide not to approve this Stipulation, or in any way condition its approval of same.
- 24. This Stipulation has resulted from extensive negotiations among the Signatories, and the terms hereof are interdependent. If the Commission does not approve this Stipulation unconditionally and without modification, then this Stipulation shall be void and no Signatory shall be bound by any of the agreements or provisions hereof.
- 25. This Stipulation embodies the entirety of the agreements between the Signatories in this case on the issues addressed herein and may be modified by the Signatories only by a written amendment executed by all of the Signatories.
- 26. If approved and adopted by the Commission, this Stipulation shall constitute a binding agreement among the Signatories. The Signatories shall cooperate in defending the validity and enforceability of this Stipulation and the operation of this Stipulation according to its terms.
- 27. If the Commission does not approve this Stipulation without condition or modification, and notwithstanding the provision herein that it shall become void, (1) neither this Stipulation nor any matters associated with its consideration by the Commission shall be considered or argued to be a waiver of the rights that any Signatory has for a decision in accordance

with RSMo. §536.080 or Article V, Section 18 of the Missouri Constitution, and (2) the Signatories shall retain all procedural and due process rights as fully as though this Stipulation had not been presented for approval, and any suggestions, memoranda, testimony, or exhibits that have been offered or received in support of this Stipulation shall become privileged as reflecting the substantive content of settlement discussions and shall be stricken from and not be considered as part of the administrative or evidentiary record before the Commission for any purpose whatsoever.

28. If the Commission accepts the specific terms of this Stipulation without condition or modification, only as to the issues in these cases explicitly set forth above, the Signatories each waive their respective rights to present oral argument and written briefs pursuant to RSMo. \$536.080.1, their respective rights to the reading of the transcript by the Commission pursuant to \$536.080.2, their respective rights to seek rehearing pursuant to \$536.500, and their respective rights to judicial review pursuant to \$386.510. This waiver applies only to a Commission order approving this Stipulation without condition or modification issued in this proceeding and only to the issues that are resolved hereby. It does not apply to any matters raised in any prior or subsequent Commission proceeding nor any matters not explicitly addressed by this Stipulation.

WHEREFORE, the Signatories respectfully request the Commission to issue an order in this case approving the Stipulation subject to the specific terms and conditions contained therein.

Respectfully submitted,

|s| Nicole Mers

Nicole Mers, #66766 Deputy Counsel P.O Box 360 Jefferson City, MO 65012 (573) 751-6651 (Telephone) (573) 751-9285 (Fax) nicole.mers@psc.mo.gov

Mark Johnson, #64940 Senior Counsel P.O. Box 360 Jefferson City, MO 65102 (573) 751-7431 (Telephone) (573) 751-9285 (Fax) mark.johnson@psc.mo.gov

ATTORNEYS FOR THE STAFF OF THE MISSOURI PUBLIC SERVICE COMMISSION

s Robert 9. Hack

Robert J. Hack, #36496 Roger W. Steiner, #39586 Kansas City Power & Light Company 1200 Main Street Kansas City, MO 64105 Phone: (816) 556-2791 Phone: (816) 556-2314

Fax: (816) 556-2787 rob.hack@kcpl.com roger.steiner@kcpl.com

James M. Fischer, #27543 Fischer & Dority, P.C. 101 Madison Street—Suite 400 Jefferson City MO 65101 Phone: (573) 636-6758 Fax: (573) 636-0383 Jfischerpc@aol.com

Joshua Harden 1201 Walnut St., Suite 2900 Kansas City, MO 64106 Phone: 573-639-7615 Joshua.Harden@stinson.com

ATTORNEYS FOR KANSAS CITY POWER & LIGHT COMPANY AND KCP&L GREATER MISSOURI OPERATIONS COMPANY

|s| Marc Poston

Marc Poston Missouri Bar No. 45722 301 W. High Street, Room 680 Jefferson City MO 65102 (573) 751-5558 marc.poston@ded.mo.gov

ATTORNEY FOR MISSOURI DIVISION OF ENERGY

|s| Mark W. Comley

Mark W. Comley 601 Monroe Street Suite 301, P.O. Box 537 Jefferson City, Missouri 65102 Phone: (573) 634-2266

Fax: (573) 636-3306 comleym@ncrpc.com

ATTORNEYS FOR ADVANCED ENERGY MANAGEMENT ALLIANCE

|s| Peggy A. Whipple

Peggy A. Whipple Missouri Bar No. 54758 514 E. High Street, Suite A Jefferson City, MO 65101 (573) 415-8379 (Telephone) (573) 415-8379 (Fax) peggy@healylawoffices.com

ATTORNEYS FOR MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION

|s| 7im Opitz

Tim Opitz Missouri Bar No. 65082 409 Vandiver Dr., Bldg. 5, Suite 205 Columbia, MO 65202 (573) 825-1796 tim@renewmo.org

ATTORNEY FOR RENEW MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 25th day of September, 2018.

Roger W. Steiner

Roger W. Steiner

P.S.C. MO. No.	7	 \boxtimes	Origina	al	Sheet No.	
			Revise	ed		
Cancelling P.S.C. MO. No.	7		Origina	al	Sheet No.	
			Revise	ed		
			For	Missouri	Retail Service	ce Area
			-			

UNDERUTILIZED INFRASTRUCTURE RIDER Schedule UIR

PURPOSE:

The purpose of this Rider is to encourage restoration or adaptive reuse of areas where underutilized distribution infrastructure including secondary transformers and service drops would be returned to active service.

AVAILABILITY:

This Rider is available to Customers who expand existing facilities or locate in rehabilitated existing facilities within areas determined to be underutilized. Descriptions of the applicable locations are defined in the Underutilized Areas section of this tariff.

This Rider is available only to those Customers currently served or otherwise qualified for service under the Company's SGS, MGS, LGS, LPS, SGA, MGA, and LGA schedules.

Customers receiving incentives under this Underutilized Infrastructure Rider may not receive any other utilization-based benefit such as those available under the Company's Economic Development Rider or similar.

APPLICABILITY:

The Company will review and approve, on an individual project basis, the plans of the rehabilitation or expansion of Customer's facilities (including primary and secondary facilities located prior to the Company point of delivery) to determine the qualification of Customer's projects under the provisions of this Rider.

Underutilized areas are defined as those served by circuits having at least 50% of rated capacity available under normal and contingency scenarios as determined annually by the Company. Underutilized circuits will not include:

- a. Circuits serving areas with identifiable near-term growth, particularly commercial and industrial areas
 at initial stages of development or where existing customers are expected to increase their connected
 load.
- b. Circuits serving areas with known platted areas for residential development.
- c. Rural circuits limited by voltage or in areas with limited development where the existing circuit is provided and designed primarily for public convenience and need.
- d. Other circuits where a low capacity rating is needed or expected by the Company.

INCENTIVE PROVISIONS:

For Non-Residential Extensions, customers locating a Distribution Extension on underutilized circuits will receive 10% additional Construction Allowance associated with the extension.

DATE OF ISSUE: January 30, 2018 DATE EFFECTIVE: March 1, 2018

ISSUED BY: Darrin R. Ives 1200 Main, Kansas City, Mo. 64105

Vice President

P.S.C. MO. No.	7	🗵	Origina	al Sheet No
			Revise	d
Cancelling P.S.C. MO. No.	7		Origina Revise	
			For _	Missouri Retail Service Area

UNDERUTILIZED INFRASTRUCTURE RIDER Schedule UIR

(continued)

UNDERUTILIZED AREAS:

The following areas have been determined to be underutilized:

- 1. (SAMPLE) Kansas City The area between Barry Road and NW 88th Street and between 169 Highway and North Oak Traffic way.
- 2. Area #2
- 3. Area #3

DATE OF ISSUE: January 30, 2018 DATE EFFECTIVE: March 1, 2018

ISSUED BY: Darrin R. Ives 1200 Main, Kansas City, Mo. 64105

Vice President

P.S.C. MO. No. 7 Fourth Revised Sheet No. 40 Canceling P.S.C. MO. No. 7 Third Revised Sheet No. 40 For Missouri Retail Service Area RENEWABLE ENERGY RIDER Schedule RER

PURPOSE

KANSAS CITY POWER AND LIGHT COMPANY

This Program is designed to provide non-Residential Customers a voluntary opportunity to purchase Renewable Energy, in addition to service provided through a generally available rate, from Renewable Energy sources that the Company contracts.

Following Commission approval of this Rider, the Company will endeavor to procure the Renewable Energy sources necessary to fulfill Customer requests for service under this Program. Pricing and related terms will be updated to reflect these sources.

AVAILABILITY

Customer accounts receiving Unmetered, Lighting, Net Metering, or Time-of-Use Service are ineligible for this Program while participating in those service agreements. This Program is not available for resale, standby, breakdown, auxiliary, parallel generation, or supplemental service.

Service under this Program is available on a limited and voluntary basis, at the Company's option, to non-Residential Customers currently receiving permanent electric service from the Company through Schedule SGS, MGS, LGS, LPS, SGA, MGA, LGA, or PGA, with an annual average monthly peak demand greater than 200 kW. At the Company's sole approval, Customers that have an aggregate electric load of at least 2.5 MW based upon peak annual demand and an average of 200 kW per account, or Governmental/Municipal Customers as established by Section 46.040, RSMo, or pursuant to Article VI, Section 15 of the Missouri Constitution and applicable enabling statutes enacted by the General Assembly thereunder, may combine separate accounts to participate in this Program.

Customers will be enrolled and subscribed on a first-come, first-served basis. Customers applying but not allowed to subscribe due to Renewable Energy resource unavailability will be placed on a waiting list and may be offered the opportunity to subscribe if subscription cancellations or forfeitures occur. Customers approved for aggregation of accounts may choose to participate in part or remain on the list as a consolidated group, depending on resource availability. Separate waiting lists will be used for this Rider in each company. Participants may cancel their subscription at any time subject to any net cost of the remaining Renewable Energy for the term. Service hereunder is provided to one end-use Customer and may not be redistributed or resold.

Within any limits prescribed by the individual tariffs, the Company will combine the subscription requirements for the Company and KCP&L Missouri Greater Operation Company jurisdictions in executing the power purchase agreement(s) for the Renewable Energy resource. The Renewable Energy resource will be initially limited to a minimum total load of 100 megawatts (MW) and a maximum total load of 200 MW. Once obtained, the PPA will be split between the jurisdictions based on the same ratio as the expected Customer subscriptions. Once the PPA split is established, that amount will be fixed for the duration of the PPA. Any subsequent PPA established under this tariff will also be split between the jurisdictions based on the same ratio as the expected Customer subscription and similarly fixed for the duration of that PPA. If customer interest exceeds a PPA limit, participation would be allocated to each customer proportional to their expressed interest. The limit will be re-evaluated if or when the 200 MW limit is reached and additional subscriptions resulting from a subsequent PPA will be made available at the sole discretion of the Company.

P.S.C. MO. No. 7 Sixth Revised Sheet No. 40A Canceling P.S.C. MO. No. 7 Fifth Revised Sheet No. 40A For Missouri Retail Service Area RENEWABLE ENERGY RIDER Schedule RER

DEFINITIONS

For purposes of this Program the following definitions apply:

KANSAS CITY POWER AND LIGHT COMPANY

- i. PARTICIPANT The Customer, specified as the Participant in the Participant Agreement, is the eligible Customer that has received notification of acceptance into the Program.
- ii. PARTICIPANT AGREEMENT The agreement between the Company and Customer, utilized for enrollment and establishing the full terms and conditions of the Program. Eligible Customers will be required to sign the Participant Agreement prior to participating in the Program. This agreement may be provided and executed electronically. A conditional Participant Agreement, between the Company and Customer, or similar, utilized for gauging customer interest in a given Resource Procurement Period will be used. These agreements may be provided and executed electronically.
- iii. POWER PURCHASE AGREEMENT (PPA) an agreement or contract between a resource owner and the Company for renewable energy produced from a specific renewable resource.
- iv. RENEWABLE ENERGY CREDITS also known as Renewable Energy Certificates or RECs, represent the environmental attributes associated with one (1) megawatt-hour of renewable electricity generated and delivered to the power grid.
- v. RENEWABLE ENERGY energy produced from a renewable resource as defined in 4 CSR 240-20.100(1)(N) and associated with this Program. Renewable resources procured will be utilized for this program or similar voluntary, green programs.
- vi. RESOURCE PROCUREMENT PERIOD the period of time in which the Company will, if the subscriptions on the waiting list warrant such effort, attempt to obtain a renewable resource to serve known renewals and the Participation Agreements queued on the waiting list. At a minimum, two Resource Procurement Periods will occur each calendar year. Each PPA offered will be represented as a new group in the Subscription Charge Pricing & Resource Specification section of this tariff. Upon the execution of a PPA associated with each resource(s) the Company shall file within 15 business days a revised tariff sheet for that resource replacing the Not-to-Exceed Price with the applicable price.
- vii. NOT-TO-EXCEED RESOURCE PRICE For each PPA offered, the Not-to-Exceed Resource Price shall reflect the upper limit of the Resource Price applicable to the Resources that comprise the PPA used to solicit final enrollment. The final Resource Price will be subject to update and the Charges and Billing section of this tariff, but shall not exceed the Not-to-Exceed Resource Price.
- viii. SUBSCRIPTION INCREMENT (SI) An eligible Customer may subscribe and receive energy from a renewable resource in single percentage increments, up to 100% of the Customer's Annual Usage.

P.S.C. MO. No.	7	Second	_ Revised Sheet No	40B
Canceling P.S.C. MO. No	7	First	_ Revised Sheet No	40B
			For Missouri Retail Ser	vice Area
		N E ENEDOV DIDED		

RENEWABLE ENERGY RIDER Schedule RER

DEFINITIONS (continued)

viii. SUBSCRIPTION SHARE (SS) – The proportion of the renewable resource, adjusted for the Renewable Resource Capacity Factor, allocated to the Customer to achieve the desired Subscription Increment amount. The Subscription Share is determined at enrollment and is calculated using the following formula:

$$SS = \frac{SL_{MW}}{RRC_{MW}}$$

Where,

$$SL_{MW} = \frac{AU_{MWh} \cdot SI}{8,760_{hours per year} \cdot RRC_{factor}}$$

AU = Annual Usage; the Customer's actual metered energy usage over the previous 12 monthly billing periods, if available, or Customer's expected metered energy usage over 12 monthly billing period as determined by Company.

RRC = Renewable Resource Capacity Factor; the average annual capacity of the renewable resource(s) as established by the Company.

 RRC_{factor} = Renewable Resource Capacity Factor; the average annual capacity factor of the renewable resource(s) as established by Company.

ENROLLMENT

- 1. The Customer must submit a completed Participant Agreement to the Company for service under this Program. In the Participant Agreement, the Customer must specify the Subscription Increment to be subscribed.
- 2. Customers applying for service under this Program must have an account that is not delinquent or in default at the beginning of the Resource Procurement Period and must have completed the required Participant Agreement.
- 3. Enrollment requests may be submitted to the Company at any time.
- The Company will review the Participant Agreement and determine if the Customer will be enrolled into the Program.

P.S.C. MO. No. 7 Second Revised Sheet No. 40C Canceling P.S.C. MO. No. 7 First Revised Sheet No. 40C For Missouri Retail Service Area RENEWABLE ENERGY RIDER Schedule RER

ENROLLMENT (continued)

KANSAS CITY POWER AND LIGHT COMPANY

5. In each Resource Procurement Period the Company will match as accurately as possible the combined Renewable Subscription Level of all Participants with a renewable resource, subject to availability. The minimum renewable resource to be acquired will have a capacity of 100 MW and the maximum will depend upon the level of Participation Agreements received. The renewable resource obtained for each Subscriber group may be made up of capacity from multiple renewable resources.

CHARGES AND BILLING

All charges provided for under, and other terms and conditions of, the Customer's applicable standard service classification(s) tariff shall continue to apply and will continue to be based on actual metered energy use during the Customer's normal billing cycle.

Under this Schedule RER, Customers will receive a Renewable Adjustment (RA), in the form of an additional charge or credit to their standard bill based upon the sale of the metered output of the renewable resource(s) into the wholesale market. The Renewable Adjustment will be calculated as follows:

$$RA = [RMO_{MWh} \cdot SS] \cdot [SC_{\text{per MWh}} - FMP_{\text{per MWh}}]$$

Where,

RMO = Metered output from the renewable resource at the market node.

SC = Subscription Charge; the delivered price per MWh of the renewable resource plus the Company Administration Charge of \$0.10 per MWh (RMO) for twenty-year term Participant Agreements. For all other Participant Agreements, the Company Administration Charge will be \$0.30 per MWh (RMO).

FMP = Final Market Price; the accumulation of all applicable market revenues and charges arising from or related to injection of the energy output of the renewable resource into the wholesale energy market in that calendar month at the nearest market node, divided by the actual metered hourly energy production, using the best available data from the regional transmission operator, who facilitates the wholesale marketplace, for the calendar month as of the date the Customer's Renewable Adjustment is being prepared. Alternatively, and at the Company's discretion if determined to be economic, the Company may seek to obtain the necessary transmission to deliver the energy output of the renewable resource to a local, Company market node. If this occurs, the Final Market Price will be calculated based on the accumulation of all applicable market revenues and charges inclusive of this delivery. The energy produced under this alternative will be subject to curtailment by the regional transmission operator. The Final Market Price will be rounded to the nearest cent.

P.S.C. MO. No. 7 Second Revised Sheet No. 40D Canceling P.S.C. MO. No. 7 First Revised Sheet No. 40D For Missouri Retail Service Area RENEWABLE ENERGY RIDER Schedule RER

CHARGES AND BILLING (continued)

KANSAS CITY POWER AND LIGHT COMPANY

The Renewable Adjustment may be applied up to 60 days later than the market transactions to allow for settlement and data processing.

Subscribers will be responsible for all costs recognized in the respective month regardless if they are directly associated with service received under this Rider for that month. Market revenues and charges may be adjusted to reflect net costs or revenues associated with service under the Program in prior months, for which more recent wholesale market settlement data supersedes the data that was used to calculate initial charges or credits that were assessed to participating Customers.

The Renewable Subscription Charge and the Subscription Share are to be determined at the time the Company obtains the renewable resource to satisfy the Participation Agreement.

Billing and settlement of charges under this Schedule may occur separately from the billing associated with service provided to a Customer's under the Standard Rate Schedules. The Company reserves the right to consolidate account data and process charges collectively to facilitate Customers electing to aggregate subscriptions under this Schedule.

TERM

Agreements under this Program are available for enrollment for five-year, ten-year, fifteen-year, and twenty-year terms. Customers will select the term at time of enrollment and will not be allow to change the term once the renewable resource serving the Customer has been obtained. Customers subscribing to more than 20% of the renewable resource will be required to commit to a minimum term of ten years.

At the end of a given Participation Agreement, Subscribers will be offered an option to renew their participation prior to offering available capacity to new customers.

RENEWABLE RESOURCE ENERGY CREDITS

Renewable Energy Credits (RECs) produced by Renewable resources associated with this program will be tracked by Company, consistent with the Customer subscriptions. RECs associated with energy obtained through this Program will be transferred to the Customer annually or at any time upon Customer request. Alternatively, and if requested, the Company will retire the RECs on behalf of the Customer with all costs associated with the registration and retirement borne by the requesting Customer.

P.S.C. MO. No. 7 Second Revised Sheet No. 40E Canceling P.S.C. MO. No. 7 First Revised Sheet No. 40E For Missouri Retail Service Area RENEWABLE ENERGY RIDER Schedule RER

TRANSFER OR TERMINATION

KANSAS CITY POWER AND LIGHT COMPANY

Participants who move to another location within the Company's Missouri service territory may request transfer of their subscription, provided the total kWh of the subscribed amount is less than the new location's average annual historical usage (actual or Company estimated). If the existing subscription level exceeds the allowed usage amount at the new location, the subscription will be adjusted down accordingly.

Participants who request termination of the Participation Agreement, or default on the Participation Agreement before the expiration of the term of the Participation Agreement, shall pay to the Company any associated costs and administration associated with termination of the subscribed renewable resource. Such termination charge may be adjusted if and to the extent another Customer requests service under this Schedule and fully assumes the obligation for the purchase of the renewable energy prior to the effective date of the contract amendment or termination; provided, however, Company will not change utilization of its assets and positions to minimize Customer's costs due to such early termination. The Participant must notify the Company in writing of their request to terminate.

If, prior to the end of the term of a given subscription, a Customer provides written notification of its election to terminate the Participation Agreement for an account covered by another Participation Agreement:

- i. The Customer without penalty may transfer service to another account that is within the Company's service territory and is either (i) currently not covered by an Participation Agreement, or (ii) is covered by a Participation Agreement for only a part of its eligible usage, in either case only to the extent the consumption at the new account under (i) or the eligible unsubscribed usage at an account that had already been receiving service under (ii) is sufficient to accommodate the transfer; or
- ii. At Customer's written request, Company will attempt to find another interested Customer that meets Company's eligibility requirements and is willing to accept transfer of service (or that part which cannot be transferred to another Customer account) for the remainder of the term of the subscription at issue; or
- iii. If option i) or ii) is not applicable as to some or all the Participation Agreement at issue, the Customer will continue to be obligated to pay for, or be eligible to receive, the Monthly Renewable Adjustment as to that part of the service that was not transferred; or
- iv. If option i) or ii) is not applicable and in lieu of option iii), the Customer may terminate service for the account at issue upon payment of the Termination Fee, which is as follows: The average of the Customer's Monthly Renewable Adjustment for the preceding 12 months (or all preceding months, if less than 12) times the number of months remaining in the term; if this value is less than or equal to zero (e.g., a credit to Customer), then the Termination Fee is zero, and in no event shall the Customer receive a net credit from Company for terminating service under this Rider.

KANSAS CITY POWER AND LIGHT COMPANY P.S.C. MO. No. 7 Second Revised Sheet No. 40F Canceling P.S.C. MO. No. 7 First Revised Sheet No. 40F For Missouri Retail Service Area

RENEWABLE ENERGY RIDER
Schedule RER

PROGRAM PROVISIONS AND SPECIAL TERMS

- 1. In procuring the Renewable Energy, the Company will ensure that Renewable Energy resources utilized under this Program are or have been placed in service after January 1, 2019.
- 2. Customers applying for service under this Program must have an account that is not delinquent or in default at the beginning of the Resource Procurement Period and must have completed the required Participant Agreement.
- 3. At enrollment, the Company will calculate the Customer's demand for the prior twelve-month period to determine eligibility. If twelve months of demand data is not available, the Company may estimate the annual demand to the nearest kW, using a method that includes, but is not limited to, usage by similarly sized properties or engineering estimates.
- 4. Participants may not combine loads across the jurisdictions for achieving participation limits, determination of subscription levels, or aggregated billing. Loads will not be combined across jurisdictions for the purpose of applying minimum term limits.
- 5. Customers that the Company, at its sole discretion, determines are ineligible will be notified promptly, after such Participant Agreement is denied.
- 6. Customer participation in this Program may be limited by the Company within the first come, first served structure, to balance Customer demand with available qualified Renewable Energy resources and any constraint with transmission facilities or capacity.
- 7. Customers who need to adjust in their commitments due to increases or decreases in electric demand may request such adjustment in writing from the Company. Efforts will be made to accommodate the requested adjustment. The Customer will be responsible for any additional cost incurred to facilitate the adjustment.
- 8. Any Customer being served or having been served on this Program waives all rights to any billing adjustments arising from a claim that the Customer's service would be or would have been at a lower cost had it not participated in the Program for any period of time.
- 9. The Company may file a request to discontinue this Program with the Commission at any time in the future. Prior to the termination, the Company will work with the participating Customer to transition them fully from the subscriptions in effect to a Standard Rate Schedule or to an alternate green power option that the Company may be providing at that time. Any Participant who cancels Program participation must wait twelve (12) months after the first billing cycle without a subscription to re-enroll in the Program.
- 10. Ownership of unsubscribed energy and the associated RECs will be assumed by the Company and incorporated into the energy provided to retail Customers. Unsubscribed amounts will be determined monthly within the companies using the monthly subscriptions in place at the time of the allocation of costs for that company. Unsubscribed levels will be recalculated monthly if one of the following actions takes place in the previous month: new subscriber added, subscription completion, or subscription transfer. All changes in Subscription status will occur at the end of the respective billing month in which the status change is requested.
- 11. All time-related terms and periods referenced within the Rider will be applied consistently across the jurisdictions as appropriate and allowed by the respective individual tariffs for this program.

P.S.C. MO. No. 7 Second Revised Sheet No. 40G Canceling P.S.C. MO. No. 7 First Revised Sheet No. 40G For Missouri Retail Service Area RENEWABLE ENERGY RIDER Schedule RER

PROGRAM PROVISIONS AND SPECIAL TERMS (continued)

KANSAS CITY POWER AND LIGHT COMPANY

- 12. The Company will file a separate tab in its Fuel Adjustment Charge (FAC) monthly reports showing the Renewable Energy Rider PPA's monthly operating data, costs, and revenues.
- 13. Any energy cost and net revenues (positive or negative) attributable to the undersubscribed capacity of the PPA of an amount that is less than or equal to 50% of the total capacity of the PPA will be borne by shareholders while the remaining net revenues (positive or negative) will flow through the FAC. The reconciliation of any net revenues (positive or negative) will occur in the FAR fillings.
- 14. The Company shall not be liable to the Customer in the event that the Renewable Energy supplier fails to deliver Renewable Energy to the market and will make reasonable efforts to encourage the Renewable Energy supplier to provide delivery as soon as possible. However, in the event that the Renewable Energy supplier terminates the Renewable Energy contract with the Company, for any reason during the term of contract with the Customers, the Company, at the election of the Customer, shall make reasonable efforts to enter into a new PPA with another Renewable Energy supplier as soon as practicable with the cost of the Renewable Energy to the Customer revised accordingly.
- 15. Operational and market decisions concerning the renewable resource, including production curtailment due to economic conditions, will be made solely by the regional transmission operator. These decisions could impact the market price received for the renewable resource energy output.

REGULATIONS

Subject to Rules and Regulations filed with the State Regulatory Commission.

P.S.C. MO. No. 7 Second Revised Sheet No. 40H Canceling P.S.C. MO. No. 7 First Revised Sheet No. 40H For Missouri Retail Service Area RENEWABLE ENERGY RIDER Schedule RER

SUBSCRIPTION CHARGE PRICING & RESOURCE SPECIFICATIONS

KANSAS CITY POWER AND LIGHT COMPANY

PPA Group	Resource Capacity (MW)	Admin Cost (\$/MWh)	Not-To- Exceed Resource Price (\$/MWh)	Resource	Resource Price (\$/MWh)	Risk Premium	State	RTO
А		\$	\$		\$	\$		-

P.S.C. MO. No	7	Fourth	Revised Sheet No	39
Canceling P.S.C. MO. No	7	Third	_ Revised Sheet No	39
			For Missouri Retail Serv	vice Area
		IPTION PILOT RIDE	ER	

PURPOSE

The purpose of the Solar Subscription Pilot Rider (Program) is to provide a limited number of Customers the opportunity to voluntarily subscribe to the generation output of a solar resource and receive electricity from solar resources.

Program Participants will subscribe and pay for Solar Blocks of five hundred (500) watts (W AC) each. Energy produced by the subscribed Solar Blocks will offset an equivalent kWh amount of energy they receive and are billed for under their standard class of service. Approximately 10,000 Solar Blocks will be available for subscription with the initial offering. This program may be expanded, depending on Customer interest and with Commission approval, after successful completion of the initial offering and pilot evaluation. Customers will be required to enroll for the Program in advance and each solar resource will be built when 90 percent of the proposed solar resource is committed. If the Company does not receive a sufficient number of subscriptions for the Program, the Company may request Commission approval to terminate this Schedule SSP.

The Company will seek to construct systems aggregating up to 2.5 MW systems to be located in the KCP&L-Missouri jurisdiction and one in the KCP&L-Greater Missouri Operations Company jurisdiction, or up to one 5.0 MW system located in the most economic Missouri location, selecting the alternative with the lowest cost for implementation. Information concerning the decision will be provided to the Commission Staff and the Office of Public Counsel. Opportunities to co-locate with other Company solar deployment will be considered. If deployed as the single system, the Solar Blocks will be split between the companies based on the same ratio as the expected Customer subscriptions. Once the Solar Block split is established, that amount will be fixed for the life of the solar resource. Any subsequent solar resource built under this tariff will also be split between the companies using the same approach, based on a ratio of the then expected Customer subscription and similarly fixed for the duration of that solar resource.

AVAILABILITY

This Rider is available to any Customer currently receiving permanent electric service under the Company's retail rate schedules. Customers must complete the required Participant Agreement and have an account that is not delinquent or in default.

Participants will be enrolled on a first-come, first-served basis. Customers applying but not allowed into the Program due to Solar Block unavailability will be placed on a waiting list and incorporated into the Program in the order they are received. Should Solar Blocks become available due to construction of additional solar resources or subscription cancellations, Customers on the waiting list will be offered the opportunity to subscribe. Subscription hereunder is provided through one meter to one end-use Customer and may not be aggregated, redistributed, or resold.

Total participation of non-residential Customers will be limited to no more than 50 percent of the total solar resource capacity during the first three months of the Program. After three months, and at the Company's sole discretion, all available solar resource capacity may be made available to all eligible Customers.

This Rider may not be combined with any other renewable energy program offered by the Company for the same Customer account.

Customers receiving Unmetered, Lighting, Net Metering, or Time-of-Use Service are ineligible for this Program while participating in those service agreements. This schedule is not available for resale, standby, breakdown, auxiliary, parallel generation, or supplemental service.

P.S.C. MO. No. 7 Second Revised Sheet No. 39A Canceling P.S.C. MO. No. 7 First Revised Sheet No. 39A For Missouri Retail Service Area SOLAR SUBSCRIPTION PILOT RIDER

SOLAR SUBSCRIPTION PILOT RIDER Schedule SSP

PRICING

The Solar Block Subscription Charge for energy sold through this Program is \$0.159 per kWh, made up of two costs:

The Solar Block cost of \$0.121 per kWh; and

KANSAS CITY POWER AND LIGHT COMPANY

• The Services and Access charge of \$0.038 per kWh.

The Solar Block cost is defined by the total cost of the solar resources built to serve the program. The Services and Access charge will be adjusted when rates are reset in future rate cases by the average percentage change to volumetric rates in those future rate cases, unless a party provides a cost study demonstrating that it would be unreasonable to adjust the Services and Access. When an additional solar resource is added to the Program, the levelized cost of the new solar resource will be averaged with the remaining levelized cost of existing solar resource(s) to determine the new price for the cost of the Solar Block. Additional solar resources will be added only if the price is less than or equal to the previous price or otherwise deemed beneficial relative to the standard rates.

SUBSCRIPTION LEVEL

Participants may subscribe to Solar Blocks that, when combined, are expected to generate up to 50 percent of their annual energy. During initial sign-up, the Customer will designate their desired subscription percentage in increments of 10 percent. The Company will provide to the Customer the number of Solar Blocks necessary to supply their subscription percentage based on the Customer's annual energy usage (Subscription Level). The Customer's annual energy usage will be determined in one of two ways. If during initial signup the Customer has 12 consecutive months of usage history at the address where the subscription is being requested, then the annual energy will be the energy consumed during that 12-month usage history. If the Customer does not have 12 consecutive months of usage history at the address where the subscription is being requested, then the annual energy will be estimated by the Company. The calculation for the number of Solar Blocks is equal to the annual energy (in kWh) divided by the expected annual energy production of one block rounded down to the lowest whole number. A Customer must have sufficient annual usage to support subscription of at least one Solar Block.

The maximum amount any one Customer may subscribe to is 2,500 kW AC of capacity. After the expansion of solar energy production, subscription for any one Customer beyond 2,500 kW AC will be at the Company's discretion. A Participant may change their subscription level only once in any 12-month period after the initial 12-month subscription. In the event there is a significant and regular reduction in Participant metered energy consumption, the Company, at its sole discretion, may adjust the Participant's subscription level after customer notice.

Participants may not combine loads across the companies for achieving participation limits, determination of subscription levels, or aggregated billing. Loads will not be combined across companies for the purpose of applying minimum term limits.

P.S.C. MO. No.	7	Second	Revised Sheet No	39B
Canceling P.S.C. MO. No	7	First	Revised Sheet No	39B
			For Missouri Retail Ser	vice Area
SOLAR SUBSCRIPTION PILOT RIDER Schedule SSP				

BILLED PURCHASE QUANTITY

The quantity of energy that will be purchased by a Participant for each monthly billing cycle will be computed as follows:

$$PQ = \frac{SL}{TSC} \cdot AME$$

Where,

PQ = Monthly Purchase Quantity in kWh
 SL = Subscription Level in kW AC
 TSC = Total Solar System Capacity in kW AC
 AME = Actual Monthly Energy Produced by the Solar Resource in kWh.

MONTHLY BILLING

- 1. The monthly energy production of the solar resource will be measured and apportioned to each Participant based on their respective Subscription Level. To facilitate billing, energy production will be applied to the monthly billing one month after it occurs.
- 2. The Participants share of the solar resource energy production will be subtracted from the metered energy consumed by the Participant for the billing month. Should the solar resource energy production amount for a given month be larger than the Participant's metered energy consumption, the net energy will be zero for that month.
- 3. Any remaining metered energy consumption will be billed under the rates associated with the Participant's standard rate schedule, including all applicable riders and charges
- 4. Other, non-energy charges defined by the standard rate schedule are not impacted by the Solar Block subscription and will be billed to the Participant.
- 5. The entire bill amount, inclusive of all standard rate charges and Program charges, must be paid according to the payment terms set forth in the Company Rules and Regulations.

P.S.C. MO. No.	7	Second	Revised Sheet No	39C
Canceling P.S.C. MO. No.	7	First	Revised Sheet No	39C
			For Missouri Retail Ser	vice Area
		RIPTION PILOT RIDE	:R	

WAITING LIST

If at the time of subscription request a Customer's desired subscription level is greater than the available energy of the solar resource, then the Customer may elect to be placed on a waiting list.

Customers will be offered an opportunity to subscribe in the order that they are placed on the waiting list, only if available capacity is greater than the customer's desired subscription level. If the available capacity is less than the Customer's desired subscription level, the Customer will be offered the opportunity to subscribe to the remaining available capacity. If the Customer does not wish to participate at this lower than desired subscription level, then the next Customer on the waiting list will be checked for subscription availability. The Company will maintain all records related to the waiting list.

Separate waiting lists will be used for this Rider for each company.

SUBSCRIPTION TERM

Participants must remain in the Program for one year, as measured from the first bill received under this Rider.

Non-residential Participants who subscribe to 25 percent of the available Solar Blocks for a given solar resource, are required to commit to a minimum term of five years.

PILOT EVALUATION

The Company will complete and submit to Staff an evaluation of this Program prior to any request for expansion or after five years of operation, whichever is first. The evaluation will include:

- Tracking of program costs and revenues (participants, all ratepayers, Company),
- Numbers and types of subscribers (by rate class and participation by low and moderate-income
 customers if available),
- Annual surveys of participating customers covering (economic considerations and customer service),
- Impact or benefits of the facility on the utility distribution system, and
- Plans to site program expansion facilities in areas where distributed generation would benefit the electric utility's distribution system, such as areas where there is a potential to avoid or minimize distribution system investment.

EXPANSION

The Company will demonstrate 90% subscription of the initially deployed system for a minimum of two years before additional solar subscriptions are offered. Program expansion will be done to the extent practical, with consideration of the energy delivered to the jurisdictional system.

P.S.C. MO. No.	7	Third	Revised Sheet No	39D
Canceling P.S.C. MO. No	7	Second	Revised Sheet No	39D
			For Missouri Retail Ser	vice Area
		RIPTION PILOT RIDE	R	

PROGRAM PROVISIONS AND SPECIAL TERMS

- 1. Customers applying for service under this Program must have an account that is not delinquent or in default at the time of application.
- 2. Renewable Energy Credits (RECs) produced by solar resources associated with this program will be tracked by company, consistent with the Customer subscriptions. All rights to the renewable energy certificates (REC) associated with the generation output of the solar facility will be retired by the Company on behalf of Participants. The Company will create a group retirement subaccount in NAR for retirement of RECs. The RECs associated with the output of the solar facility will be designated in NAR for public viewing.
- 3. Any Participant being served or having been served on this Program waives all rights to any billing adjustments arising from a claim that the Participant's service would be or would have been at a lower cost had it not participated in the Program for any period of time.
- 4. Participants who move to another location within the Company's Missouri service territory may transfer their subscription, provided the total kWhs of the subscribed amount is not more than the new location's allowed subscription level (actual or estimated). If the subscription level exceeds the allowed amount at the new location, the subscription will be adjusted down accordingly. Transfers between companies are not allowed. If customers choose to move between companies, they will be required to terminate their subscription with the previous company and subscribe with the new company, subject to the terms of the approved tariff for that company.
- 5. Participants must notify the Company in writing, including by email, of their intent to transfer any subscription(s). Transfers will only be effective if the Transferee satisfies the terms and conditions applicable to the subscription and signs the Participant Agreement and assumes all responsibilities associated therewith.
- 6. Customers that subscribe will continue as Participants until they cancel their subscription or the Program is terminated. New subscriptions and cancelations require notice 20 days prior to the end of the Participant's billing cycle and will take effect at the beginning of the next applicable billing cycle.
- 7. Upon cancelation of a Participant's service, Participants may transfer their entire subscription to another eligible Participant's service agreement, including non-profits, for a \$25 fee. Participants with more than one Solar Block may transfer their Solar Block subscriptions in whole subscription increments to one or more Eligible Customers for a \$25 fee per transfer.
- 8. Any Participant who cancels Program participation must wait 12 months after the first billing cycle without a subscription to re-enroll in the Program.
- 9. Unsubscribed amounts will be determined monthly within the companies using the monthly subscriptions in place at the time of the allocation of costs for that company. Responsibility for any undersubscribed costs will shared between customers and shareholders with shareholders bearing 75% of the cost of any unsubscribed capacity and customers bearing the remaining 25%.
- 10. All time-related terms and periods referenced within the Rider will be applied consistently across the companies as appropriate and allowed by the respective individual tariffs for this program.

P.S.C. MO. No. 7 Second Revised Sheet No. 39E Canceling P.S.C. MO. No. 7 First Revised Sheet No. 39E For Missouri Retail Service Area SOLAR SUBSCRIPTION PILOT RIDER Schedule SSP

DEMAND SIDE INVESTMENT MECHANISM & NON-MEEIA OPT-OUT PROVISIONS

KANSAS CITY POWER AND LIGHT COMPANY

Subject to Schedule DSIM and Rules and Regulations filed with the State Regulatory Commission (Section 8.10, Sheet 1.28).

FUEL ADJUSTMENT

Fuel Adjustment Clause, Schedule FAC, shall be applicable to all customer billings under this schedule.

TAX ADJUSTMENT

Tax Adjustment Schedule TA shall be applicable to customer billings under this schedule.

REGULATIONS

Subject to Rules and Regulations filed with the State Regulatory Commission.

P.S.C. MO. No. 7 Second Revised Sheet No. 28 Canceling P.S.C. MO. No. 7 First Revised Sheet No. 28 For Missouri Retail Service Area STANDBY SERVICE RIDER Schedule SSR

APPLICABILITY

Applicable to each customer with behind the meter on-site parallel distributed generation and/or storage system(s) with a capacity over 100 kilowatts (kW), as a modification to standard electric service supplied under either the tariffed rate schedules of Medium General Service (MGS), Large General Service (LGS), or Large Power Service (LPS). Applicable to Small General Service (SGS) customers with a rated capacity of 50 kilowatts (kW) or more who do not have a net metering interconnection agreement.in place. SGS customers are not subject to minimum supplemental contract capacity requirements or fixed reservation or access charges for standby service other than the administrative charge. Customers with emergency backup, solar or wind generation that is not integrated with a storage system are exempt from this Rider.

DEFINITIONS

DISTRIBUTED GENERATION AND/OR STORAGE - Customer's private on-site generation and/or storage that:

- 1. is located behind the meter on the customer's premises,
- 2. has a rated capacity of 50 kW or more applicable to SGS customers, or 100 kW or more applicable to MGS, LGS and LPS customers.
- 3. operates in parallel with the Company's system, and

KANSAS CITY POWER AND LIGHT COMPANY

4. adheres to applicable interconnection agreement entered into with the Company.

SUPPLEMENTAL SERVICE - Electric service provided by the Company to customer to supplement normal operation of the customer's on-site parallel distributed generation and/or storage in order to meet the customer's full-service requirements.

STANDBY SERVICE - Service supplied to the premises by the Company in the event of the customer exceeding its Supplemental Contract Capacity. Standby Service may be needed on either a scheduled or unscheduled basis. Standby Service comprises capacity and associated energy during the time it is used.

BACKUP SERVICE - Unscheduled Standby Service.

MAINTENANCE SERVICE - Scheduled Standby Service.

BACK-UP SERVICE - The portion of Standby Contract Capacity and associated energy used without advance permission from the Company. The customer must notify the Company within thirty (30) minutes of taking Back-up Service for amounts over five (5) megawatts (MW). For Back-up Service billed, the customer shall be charged the daily standby demand charge for back-up service and back-up energy charges associated with Standby Service. The rates for these charges as well as the monthly fixed charges are stated in this Rider. Back-up Service Charges will be shown and calculated separately on the customer bill.

MAINTENANCE SERVICE - The portion of Standby Contract Capacity used with advance permission from the Company. The customer must schedule Maintenance Service with the Company not less than six (6) days prior to its use. Maintenance Service may be available during all months and shall not be greater than the seasonal Standby Contract Capacity. The scheduling of Maintenance Service may be restricted by the Company during times associated with system peaking conditions or other times as necessary. For Maintenance Service billed, the customer shall be charged the daily standby demand charge for maintenance service associated with Standby Service Demand. The rates for these daily demand charges as well as the monthly fixed charges are stated in this Rider. Energy charges for Maintenance Service associated with the Standby Service will be billed as standard energy charges per the applicable tariffed rate schedule. Maintenance Service charges will be shown and calculated separately on the customer bill.

P.S.C. MO. No. 7 Second Revised Sheet No. 28A Canceling P.S.C. MO. No. 7 First Revised Sheet No. 28A For Missouri Retail Service Area STANDBY SERVICE RIDER Schedule SSR

DEFINITIONS (continued)

SUPPLEMENTAL CONTRACT CAPACITY - The customer must designate and contract by season the maximum amount of demand, in kW, taken at the premises through the billing meter that may be billed on the applicable standard tariffed rate and shall be mutually agreeable to customer and Company. The Supplemental Contract Capacity shall insofar as possible estimate ninety percent (90%) of the historic or probable loads of the facility as adjusted for customer generation.

STANDBY CONTRACT CAPACITY - The higher of:

KANSAS CITY POWER AND LIGHT COMPANY

- 1. The number of kilowatts mutually agreed upon by Company with customer as representing the customer's maximum service requirements under all conditions of use less Supplemental Contract Capacity, and such demand shall be specified in customer's Electric Service Agreement. Such amount shall be seasonally designated and shall not exceed the nameplate rating(s) of the customer's own generation. The amount of Standby Contract Capacity will generally consider the seasonal (summer or winter billing periods) capacity ratings and use of the generator(s), or may be selected based on a Company approved load shedding plan.
- 2. The maximum demand established by customer in use of Company's service less the product of Supplemental Contract Capacity and 110%.

Fixed monthly charges for generation and transmission access and facilities shall be levied upon a capacity not to exceed the nameplate rating(s) of the customer's generating unit(s).

SUPPLEMENTAL DEMAND - The lesser of:

- 1. Supplemental Contract Capacity or
- 2. The Total Billing Demand in this Rider.

STANDBY SERVICE DEMAND - The Total Billing Demand as determined in this Rider in excess of the Supplemental Contract Capacity.

TOTAL BILLING DEMAND - Total Billing Demand for purposes of this Rider shall be the maximum 30-minute demand established during peak hours or 50% of the maximum 30 minute demand established during off-peak hours, whichever is greater, but in no event less than 25 kW for Medium General Service, 200 kW for Large General Service, nor less than 1,000 kW for Large Power Service.

FACILITIES CHARGE FOR SUPPLEMENTAL SERVICE – The monthly facilities charge for supplemental service shall equal the facilities charge of the tariffed rate schedule multiplied by the Supplemental Contract Capacity.

OFF-PEAK PERIOD - Off-Peak Hours shall be as defined in Rider LPS-1.

ON-PEAK PERIOD - On-Peak Hours are all hours other than Off-Peak Hours.

P.S.C. MO. No. 7 Ninth Revised Sheet No. 28B Canceling P.S.C. MO. No. 7 Eighth Revised Sheet No. 28B For Missouri Retail Service Area STANDBY SERVICE RIDER Schedule SSR

GENERAL PROVISIONS

KANSAS CITY POWER AND LIGHT COMPANY

The contract term shall be one (1) year, automatically renewable, unless usage, plant modifications or additional generation requires a change to Supplemental Contract Capacity or Standby Contract Capacity.

The Company will install and maintain the necessary suitable meters for measurement of service rendered hereunder. The Company may inspect generation logs or other evidence that the customer's generator is being used in accordance with the provisions this Rider.

Power production equipment at the customer site shall not commence parallel operation until after inspection by the Company and a written interconnection agreement is executed. The sale of excess energy to the Company may be included in the interconnection or other agreement.

If at any time customer desires to increase demand above the capacity of Company's facilities used in supplying said service due to plant modifications, customer will sign a new agreement for the full capacity of service required and in accordance with applicable rules governing extension of its distribution system.

Those customers choosing to install more than one (1) generating unit on the same premises will have a seventy five percent (75%) discount applied to the monthly Generation and Transmission Access Charges and Facilities Charges applicable to each additional generator on the same premises.

In addition to the above specific rules and regulations, all of Company's General Rules and Regulations shall apply to the supply of service under this Rider.

RANSAS CITY POWER AND LIGHT COMPANY P.S.C. MO. No. 7 First Revised Sheet No. 28C Canceling P.S.C. MO. No. 7 Revised Sheet No. 28C For Missouri Retail Service Area STANDBY SERVICE RIDER

Schedule SSR

RATE

	SGS Primary Voltage	SGS Secondary Voltage
Stand	dby Fixed Charges	, j
Administrative Charge	\$110.00	\$110.00
Facilities Charge per month per kW	of Contracted Standby C	apacity
Summer	\$0.000	\$0.000
Winter	\$0.000	\$0.000
Generation and Transmission Access Charge per month per kW of Contracted Standby Capacity	\$0.000	\$0.000
Daily Standb	by Demand Rate - Summe	r
Back-Up	\$0.202	\$0.207
Maintenance	\$0.101	\$0.103
Daily Stand	by Demand Rate - Winter	
Back-Up	\$0.202	\$0.207
Maintenance	\$0.101	\$0.103
Back-Up Eı	nergy Charges - Summer	
kWh in excess of Supplemental Contract Capacity	\$0.16804	\$0.17197
Back-Up E	Energy Charges - Winter	
kWh in excess of Supplemental Contract Capacity	\$0.13058	\$0.13361

P.S.C. MO. No.	7	Third	_ Revised Sheet No	28D
Canceling P.S.C. MO. No.	7	Second	Revised Sheet No	28D
			For Missouri Retail Ser	vice Area
	STA	NDBY SERVICE RIDER Schedule SSR		

RATE (Continued)

	MGS Secondary Voltage	MGS Primary Voltage	LGS Secondary Voltage	LGS Primary Voltage			
	Star	ndby Fixed Charges					
Administrative Charge	\$110	\$110	\$130	\$130			
G & T Access Charge per month per kW of Contracted Standby Demand	\$0.530	\$0.518	\$0.858	\$0.838			
Facilities Charge (per month	l per kW of Contracte	Led Standby Demand)					
Summer	\$0.530	\$0.518	\$0.858	\$0.838			
Winter	\$0.270	\$0.263	\$0.462	\$0.451			
		y Demand Rate - Sum Standby Service Dema					
Maintenance	\$0.214	\$0.193	\$0.286	\$0.263			
Back-Up	\$0.428	\$0.386	\$0.572	\$0.525			
		by Demand Rate - Wir Standby Service Dema					
Maintenance	\$0.171	\$0.151	\$0.222	\$0.200			
Back-Up	\$0.342	\$0.302	\$0.444	\$0.400			
Back-Up Energy Charges - Summer (kWh in excess of Supplemental Contract Capacity)							
	\$0.11090	\$0.10825	\$0.10077	\$0.09851			
	Back-Up Energy Charges - Winter (kWh in excess of Supplemental Contract Capacity)						
	\$0.09584	\$0.09358	\$0.09259	\$0.09048			

KANSAS CITY POWER AND LIGHT COMPANY P.S.C. MO. No. 7 Original Sheet No. 28E Canceling P.S.C. MO. No. 7 Sheet No. 28E For Missouri Retail Service Area STANDBY SERVICE RIDER Schedule SSR

RATE (Continued)

	LPS Secondary Voltage	LPS Primary Voltage	LPS Substation Voltage	LPS Transmission Voltage	
		ndby Fixed Charges			
Administrative Charge	\$430	\$430	\$430	\$430	
G & T Access Charge per month per kW of Contracted Standby Demand	\$0.922 \$0.901		\$0.890	\$0.882	
Facilities Charge (per month	ner kW of Contract	L ed Standhy Demand)			
Summer	\$0.922	\$0.901	\$0.890	\$0.882	
Winter	\$0.679	\$0.664	\$0.656	\$0.650	
	Daily Standb	y Demand Rate - Sum Standby Service Dema	mer	¥3.555	
Maintenance	\$0.314	\$0.288	\$0.210	\$0.176	
Back-Up	\$0.628	\$0.575	\$0.421	\$0.353	
	Daily Standl	by Demand Rate - Wir	nter		
	(Per kW of S	Standby Service Dema	nd)		
Maintenance	\$0.288	\$0.262	\$0.185	\$0.152	
Back-Up	\$0.576	\$0.524	\$0.371	\$0.303	
·	Back-Up En	ergy Charges - Sumn	ner		
		Supplemental Contract			
	\$0.09442	\$0.09226	\$0.09118	\$0.09037	
	Back-Up E	nergy Charges - Wint	er		
	(kWh in excess of S	Supplemental Contract	Capacity)		
	\$0.08004	\$0.07821	\$0.07731	\$0.07660	

KCP&L GREATER MISSOURI OPERATIONS COMPANY

P.S.C. MO. No	1	<u>2nd</u>	Revised Sheet No	128
Canceling P.S.C. MO. No.	1	1st	_ Revised Sheet No	128
			For Missouri Retail Ser	vice Area
		SERVICE RIDER		

APPLICABILITY

Applicable to each customer with behind the meter on-site parallel distributed generation and/or storage system(s) with a capacity over 100 kilowatts (kW), as a modification to standard electric service supplied under either the tariffed rate schedules of Large General Service (LGS), or Large Power Service (LPS).

Applicable to Small General Service (SGS) customers with a rated capacity of 50 kilowatts (kW) or more who do not have a net metering interconnection agreement.in place. SGS customers are not subject to minimum supplemental contract capacity requirements or fixed reservation or access charges for standby service other than the administrative charge.

Customers with emergency backup, solar or wind generation that is not integrated with a storage system are exempt from this Rider.

DEFINITIONS

DISTRIBUTED GENERATION AND/OR STORAGE - Customer's private on-site generation and/or storage that:

- 1. is located behind the meter on the customer's premises,
- has a rated capacity of 50 kW or more applicable to SGS customers, or 100 kW or more applicable to MGS, LGS and LPS customers.
- 3. operates in parallel with the Company's system, and
- 4. adheres to applicable interconnection agreement entered into with the Company.

SUPPLEMENTAL SERVICE - Electric service provided by the Company to customer to supplement normal operation of the customer's on-site parallel distributed generation and/or storage in order to meet the customer's full-service requirements.

STANDBY SERVICE - Service supplied to the premises by the Company in the event of the customer exceeding its Supplemental Contract Capacity. Standby Service may be needed on either a scheduled or unscheduled basis. Standby Service comprises capacity and associated energy during the time it is used.

BACKUP SERVICE - Unscheduled Standby Service.

MAINTENANCE SERVICE - Scheduled Standby Service.

BACK-UP SERVICE - The portion of Standby Contract Capacity and associated energy used without advance permission from the Company. The customer must notify the Company within thirty (30) minutes of taking Back-up Service for amounts over five (5) megawatts (MW). For Back-up Service billed, the customer shall be charged the daily standby demand charge for back-up service and back-up energy charges associated with Standby Service. The rates for these charges as well as the monthly fixed charges are stated in this Rider. Back-up Service Charges will be shown and calculated separately on the customer bill.

MAINTENANCE SERVICE - The portion of Standby Contract Capacity used with advance permission from the Company. The customer must schedule Maintenance Service with the Company not less than six (6) days prior to its use. Maintenance Service may be available during all months and shall not be greater than the seasonal Standby Contract Capacity. The scheduling of Maintenance Service may be restricted by the Company during times associated with system peaking conditions or other times as necessary. For Maintenance Service billed, the customer shall be charged the daily standby demand charge for maintenance service associated with Standby Service Demand. The rates for these daily demand charges as well as the monthly fixed charges are stated in this Rider. Energy charges for Maintenance Service associated with the Standby Service will be billed as standard energy charges per the applicable tariffed rate schedule. Maintenance Service charges will be shown and calculated separately on the customer bill.

P.S.C. MO. No. ______ Original Sheet No. ______ Canceling P.S.C. MO. No. ______ Revised Sheet No. ______ For Missouri Retail Service Area STANDBY SERVICE RIDER Schedule SSR

DEFINITIONS (continued)

SUPPLEMENTAL CONTRACT CAPACITY - The customer must designate and contract by season the maximum amount of demand, in kW, taken at the premises through the billing meter that may be billed on the applicable standard tariffed rate and shall be mutually agreeable to customer and Company. The Supplemental Contract Capacity shall insofar as possible estimate ninety percent (90%) of the historic or probable loads of the facility as adjusted for customer generation.

STANDBY CONTRACT CAPACITY - The higher of:

- 1. The number of kilowatts mutually agreed upon by Company with customer as representing the customer's maximum service requirements under all conditions of use less Supplemental Contract Capacity, and such demand shall be specified in customer's Electric Service Agreement. Such amount shall be seasonally designated and shall not exceed the nameplate rating(s) of the customer's own generation. The amount of Standby Contract Capacity will generally consider the seasonal (summer or winter billing periods) capacity ratings and use of the generator(s), or may be selected based on a Company approved load shedding plan.
- 2. The maximum demand established by customer in use of Company's service less the product of Supplemental Contract Capacity and 110%.

Fixed monthly charges for generation and transmission access and facilities shall be levied upon a capacity not to exceed the nameplate rating(s) of the customer's generating unit(s).

SUPPLEMENTAL DEMAND - The lesser of:

- 1. Supplemental Contract Capacity or
- 2. The Total Billing Demand in this Rider.

STANDBY SERVICE DEMAND - The Total Billing Demand as determined in this Rider in excess of the Supplemental Contract Capacity.

TOTAL BILLING DEMAND - Total Billing Demand for purposes of this Rider shall be the maximum 30-minute demand established during peak hours or 50% of the maximum 30 minute demand established during off-peak hours, whichever is greater, but in no event less than 25 kW for Medium General Service, 200 kW for Large General Service, nor less than 1,000 kW for Large Power Service.

FACILITIES CHARGE FOR SUPPLEMENTAL SERVICE – The monthly facilities charge for supplemental service shall equal the facilities charge of the tariffed rate schedule multiplied by the Supplemental Contract Capacity.

OFF-PEAK PERIOD - Off-Peak Hours shall be as defined in Rider LPS-1.

ON-PEAK PERIOD - On-Peak Hours are all hours other than Off-Peak Hours.

Canceling P.S.C. MO. No. ______ Original Sheet No. ______ Original Sheet No. ______ For Missouri Retail Service Area STANDBY SERVICE RIDER Schedule SSR

GENERAL PROVISIONS

The contract term shall be one (1) year, automatically renewable, unless usage, plant modifications or additional generation requires a change to Supplemental Contract Capacity or Standby Contract Capacity.

The Company will install and maintain the necessary suitable meters for measurement of service rendered hereunder. The Company may inspect generation logs or other evidence that the customer's generator is being used in accordance with the provisions this Rider.

Power production equipment at the customer site shall not commence parallel operation until after inspection by the Company and a written interconnection agreement is executed. The sale of excess energy to the Company may be included in the interconnection or other agreement.

If at any time customer desires to increase demand above the capacity of Company's facilities used in supplying said service due to plant modifications, customer will sign a new agreement for the full capacity of service required and in accordance with applicable rules governing extension of its distribution system.

Those customers choosing to install more than one (1) generating unit on the same premises will have a seventy five percent (75%) discount applied to the monthly Generation and Transmission Access Charges and Facilities Charges applicable to each additional generator on the same premises.

In addition to the above specific rules and regulations, all of Company's General Rules and Regulations shall apply to the supply of service under this Rider.

KCP&L GREATER MISSOURI OPERATIONS COMPANY

P.S.C. MO. No1	Original Sheet No. 128.3
Canceling P.S.C. MO. No	Revised Sheet No
	For Missouri Retail Service Area
STANDBY SERVICI Schedule SS	

RATE

	SGS Secondary	SGS Primary	LGS Secondary	LGS Primary	
	Voltage	Voltage	Voltage	Voltage	
	Standby Fixed Charges				
Administrative Charge	\$110.00	\$110.00	\$130.00	\$130.00	
Facilities Charge per month per kW of Contracted Standby Capacity					
Summer	\$0.161	\$0.156	\$0.111	\$0.107	
Winter	\$0.157	\$0.152	\$0.075	\$0.072	
Generation and Transmission Access Charge per month per kW of Contracted Standby Capacity	\$0.161	\$0.156	\$0.111	\$0.107	
Daily Standby Demand Rate - Summer					
Back-Up	\$0.162	\$0.160	\$0.193	\$0.139	
Maintenance	\$0.081	\$0.080	\$0.097	\$0.070	
Da	ily Standby Dei	mand Rate - Wi	nter		
Back-Up	\$0.171	\$0.169	\$0.184	\$0.130	
Maintenance	\$0.086	\$0.084	\$0.092	\$0.065	
Ва	ack-Up Energy	Charges - Sumi	mer		
kWh in excess of Supplemental Contract Capacity	\$0.09952	\$0.09337	\$0.09174	\$0.08897	
Е	Back-Up Energy	Charges - Win	ter		
kWh in excess of Supplemental Contract Capacity	\$0.07228	\$0.07100	\$0.06990	\$0.06736	

KCP&L GREATER MISSOURI OPERATIONS COMPANY P.S.C. MO. No. 1 Original Sheet No. 128.4 Canceling P.S.C. MO. No. Revised Sheet No. For Missouri Retail Service Area STANDBY SERVICE RIDER Schedule SSR

RATE (Continued)

	LPS Secondary Voltage	LPS Primary Voltage	LPS Substation Voltage	LPS Transmission Voltage	
	Standby Fixed Charges				
Administrative Charge	\$430.00	\$430.00	\$430.00	\$430.00	
Facilities Charge per month per kW of Contracted Standby Capacity					
Summer	\$1.332	\$1.292	\$1.264	\$1.255	
Winter	\$0.693	\$0.673	\$0.658	\$0.654	
Generation and Transmission Access Charge per month per kW of Contracted Standby Capacity	\$1.332	\$1.292	\$1.264	\$1.255	
Daily Standby Demand Rate - Summer					
Back-Up	\$0.745	\$0.702 \$0.351	\$0.506 \$0.253	\$0.502 \$0.251	
Maintenance	\$0.372				
D	Daily Standby Demand Rate - Winter				
Back-Up	\$0.536	\$0.499	\$0.307	\$0.305	
Maintenance	\$0.268	\$0.250	\$0.154	\$0.153	
В	ack-Up Energy	Charges - Sumi	mer		
kWh in excess of Supplemental Contract Capacity	\$0.05678	\$0.05505	\$0.05353	\$0.05458	
	Back-Up Energy	/ Charges - Win	ter		
kWh in excess of Supplemental Contract Capacity	\$0.05300	\$0.05142	\$0.05058	\$0.04929	

Public Version

Exhibit:

Issues: Overview of COVID

Response and Customer

Service Initiatives

Witness: Charles A. Caisley Type of Exhibit: Direct Testimony
Sponsoring Party: Evergy Missouri Metro
Case No. ER-2022-0129

Date Testimony Prepared: January 7, 2022

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2022-0129

DIRECT TESTIMONY

OF

CHARLES A. CAISLEY

ON BEHALF OF

EVERGY MISSOURI METRO

Kansas City, Missouri January 2022

DIRECT TESTIMONY

OF

CHARLES A. CAISLEY

Case No. ER-2022-0129

1		I. INTRODUCTION
2	Q:	Please state your name and business address.
3	A:	My name is Charles A. Caisley. My business address is 1200 Main, Kansas City, Missouri
4		64105.
5	Q:	By whom and in what capacity are you employed?
6	A:	I am employed by Evergy Metro, Inc. I serve as Senior Vice President, Public Affairs, as
7		well as Chief Customer Officer for Evergy, Inc., Evergy Metro, Inc. d/b/a as Evergy
8		Missouri Metro ("Evergy Missouri Metro"), Evergy Missouri West, Inc. d/b/a Evergy
9		Missouri West ("Evergy Missouri West"), Evergy Metro, Inc. d/b/a Evergy Kansas Metro
10		("Evergy Kansas Metro"), and Evergy Kansas Central, Inc. and Evergy South, Inc.,
11		collectively d/b/a as Evergy Kansas Central ("Evergy Kansas Central") the operating
12		utilities of Evergy, Inc.
13	Q:	On whose behalf are you testifying?
14	A :	I am testifying on behalf of Evergy Missouri Metro and Evergy Missouri West
15		(collectively, "Evergy" or "Company").
16	Q:	What are your responsibilities?
17		I am the executive responsible for leading the Customer and Community Solutions
18		Division at Evergy. That division is focused on everything that directly interacts with and
19		serves customers and communities within Evergy's service territories. Within that

division, I am responsible for small-scale distributed and renewable generation projects, energy products and services platforms, energy efficiency and demand response portfolio, community and customer strategy and communications, marketing, economic development, regulatory affairs, governmental affairs, and public relations functions. Many of these areas are responsible for direct interaction with Evergy customers and stakeholders. These areas of direct customer interaction include; online/electronic transactions and portals, social media, community affairs, business customers, customer complaints, city franchises and regulated and non-regulated products and services. In addition, the Company's customer service operations, including our contact centers as well as our billing and metering operations are also part of the Customer and Community Solutions Division. I am also responsible for leading a cross-functional team of individuals with responsibility for our overall customer experience strategy and delivery. This includes support teams, project delivery and data analytics teams that drive customer solutions, change management and customer experience enhancements.

Q: Please describe your education, experience and employment history.

A:

I graduated from the University of Illinois in Urbana-Champaign with a bachelor's degree in political science. I earned a Juris Doctorate degree from St. Louis University School of Law and a Master of Business Administration from Washington University in St. Louis. I joined KCP&L (now Evergy Metro) in 2007 as Director of Government Affairs. Prior to joining Evergy, I was employed by the Missouri Energy Development Association ("MEDA"), the Missouri Industry Association for Missouri investor-owned utilities, as President. Prior to that I was employed as the Chief of Staff to the Speaker of the Missouri House. In both positions, I dealt extensively with Missouri utility law and energy policy.

1	Q:	Have you previously testified in a proceeding at the Missouri Public Service
2		Commission ("Commission" or "MPSC") or before any other utility regulatory
3		agency?
4	A:	Yes, I have testified before both the MPSC and State Corporation Commission for the State
5		of Kansas ("KCC").
6	Q:	Please provide a brief overview of this rate case as it relates to customer service and
7		customer experiences with Evergy.
8	A:	Investments focused on automation and system reliability, including in new billing systems
9		and advanced metering infrastructure ("AMI") technology, along with and other rate base
10		investments enhance Evergy's customers' experience with the utility. As our witnesses
11		discuss, effective investment coupled with the Company's disciplined cost management
12		and abundant merger savings and efficiencies achieved to-date enables Evergy to continue
13		to drive down operating costs while maintaining and improving quality of customer service
14		and reliability.
15		Proposals made in this rate case also continue our efforts in satisfying customer
16		needs by expanding customer choice in rates for service. Building on its 3-period, opt-in
17		time-of-use ("TOU") rate that Evergy began offering to its customers in October 2019,
18		Evergy now proposes additional TOU rates, a fixed bill (subscription pricing) pilot option,
19		a pre-pay pilot option and other sustainable rate options for its customers. We also present
20		revised business transportation electrification initiatives that include rebate programs and

a business TOU rate for EV charging. The proposals in this case address customers' desires

for rates for service, payment options or programs that reflect their individual lifestyle and

21

22

needs. The system investments that we have presented in prior cases and in this case continue to unlock opportunities for optional rates to meet customers' needs and desires.

This rate case filing also provides for consistency in rate design across Evergy's customer base (even though separate rate jurisdictions) aiding in ease of customer communication and understanding of Evergy offerings across our customer base. These proposals and investments will increase customer satisfaction and customer experience for our customers.

Q: What is the purpose of of your testimony?

A:

My testimony will discuss Evergy's customer initiatives to offer more customer choice to our customers in how they receive electric service from the Company. In particular, my testimony will discuss Evergy's customer experience strategy, Evergy's Rate Modernization Plan ("Rate Plan"), previously filed business transportation electrification initiatives from Docket Nos. ET-2021-0151 and -0269 that the Commission advised that Evergy readdress in this rate case, and Evergy's response to the COVID-19 pandemic to assist our customers during this difficult time.

Q: How is the remainder of your testimony organized?

- 17 A: The remainder of my testimony is organized in the following sections:
 - Section II discusses Evergy's customer initiatives to bring more customer choice to
 our customers in how they receive electric service from the Company, including
 Evergy's Rate Plan, TOU rates, a fixed bill offer, a pre-pay offer, sustainable rate
 offers, and business transportation electrification ("TE") rates, as well are revisions
 to existing programs.

1		Section III discusses the Company's Rate Modernization Plan and customer choice
2		initiatives.
3		• Section IV discusses the importance of the revised business transportation
4		electrification pilot initiatives that include the Commercial Electric Vehicle ("EV")
5		Charger Rebate Program, Business EV Charging Service Rate and Customer
6		Education and Program Administration program to support the Commercial EV
7		Charger Rebate Program and Business EV Charging Service Rate.
8		• Section V discusses Evergy's response to the ongoing COVID-19 pandemic and
9		efforts to assist our customers.
10 11		II. CUSTOMER SERVICE, CUSTOMER EXPERIENCE AND COMMUNITY INVOLVEMENT
12	Q:	How would you describe Evergy's approach to customer satisfaction or customer
13		experience strategy?
14	A:	Evergy takes customer experience very seriously, and we continually strive to improve our
15		customer satisfaction. We look at five key areas when it comes to our customer experience:
16		1. Steady Improvement in Customer Service and Experience: This means creating
17		
40		true omni-channel customer service and interaction. It means an increasing focus on digital
18		true omni-channel customer service and interaction. It means an increasing focus on digital self-service to enable value-added human interactions. By handling routine, repeatable
18		
		self-service to enable value-added human interactions. By handling routine, repeatable
19		self-service to enable value-added human interactions. By handling routine, repeatable service digitally and through self-service, we will be able to leave more time for Evergy

industry benchmarking with outcome-based KPI's and metrics. We will continue to utilize

standard industry metrics to measure and benchmark how we interact and transact business

23

24

with customers. This includes measuring and working to see improvements in our billing,
contact center, electronic portals, communications, and social media. Our goal is to be top
quartile among utilities nationwide and to see continual improvement in these metrics as
well as continual streamlining in our customer processes. We will also look beyond
standard utility benchmarks to see what defines superior customer service in other retail-
oriented industries to glean what we can and apply it to our customer experience strategy
where it makes prudent financial and service sense to do so.

And, it means collaboratively working with a broad range of stakeholders to modernize the regulatory construct around customer service and advocate for needed policy changes.

- 2. Continuing Focus on O&M Efficiency and Cost Competitiveness: It is imperative that we don't just look at improving customer experience, but that we also prioritize cost-effectiveness and cost reductions. In addition to cost efficiencies targeted in the merger of KCP&L and Westar, we are looking to find incremental hard cost reductions over the coming years to improve our per customer interaction cost and to prioritize regional rate competitiveness. Some of the areas we will be focusing on include, but are not limited to: increasing automation; increasing digital external and internal functionality; universal customer service (meaning that customer service employees located in Wichita, Topeka, Raytown or Kansas City can handle any Evergy customer issue regardless of rate jurisdiction or state); and streamlining cross-functional customer service processes. These savings, in turn, we will use to fund or offset rate impacts of investment in our customer experience improvement strategy
- 3. **Focusing on Customer Optionality and Moments that Matter**: Evergy has done considerable research into what customers expect from their electric utility, what they

expect from any retail service provider and also the transactions and aspects of customer service that matter most to our residential and business customers. Increasingly, customers expect to have service that is more tailored and customized to their needs. Both residential and business customers increasingly have different needs and want to know that their electric provider is willing to and capable of addressing those needs. For example, depending on your household make-up, age and location, residential customers expect optionality to have a variety of different rate plans, energy efficiency programs, renewable energy options, billing plans, electric vehicle support and value-added services beyond what are available today of historically considered standard electric utility service. This is only going to increase over the next decade with the advance of technology. In addition, electric customers expect reliability and a focus on affordability. Customers expect basic utility functions are done in a timely and efficient manner—for example that bills will be accurate and on time. However, there are a variety of transactions that create incremental value and a much better overall experience for customers. Evergy has identified these key moments and is working on improving in each of these areas.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

4. Infrastructure Utilization, Coupled with Rapid and Flexible Deployment of Customer Service Enhancements: Evergy has invested hundreds of millions of dollars over the last decade in advanced metering technology and customer information and services platforms. A key priority over the next five years is to fully utilize the capabilities and utilization of core platform investments like AMI and customer information systems. For the last four years, Evergy has completely converted and upgraded its customer information system. That was a multi-year project that kept us from being able to pursue many needed customer enhancements. Now, that the conversion and upgrade of those

systems are complete and operating in a stable fashion, we are looking to being rapidly deploying customer service enhancements, like better customer notifications, an online marketplace, enhanced and modernized rates and rate modeling and a host of other capabilities. To facilitate this we are completing an IT and capex roadmap that reduces and have created an agile implementation team and process to enable our ability to continuously update our customer interface enhancements on a 4-to-8-week cycle.

A:

- 5. **Community Commitment and Involvement**: When the communities that Evergy serves succeed, so does Evergy. We are a leader in our community efforts in our service territory. We take community involvement very seriously.
- 10 Q: Has Evergy adopted a plan for moving forward to enhance customer experience and increase customer satisfaction?
 - Yes. Evergy has adopted a five-year strategic plan known as the Sustainability Transformation Plan ("STP") that accelerates our work to create a forward-thinking, customer-centric, and sustainable energy company. The STP focuses on (1) grid modernization, which promotes improved resiliency and grid capabilities, (2) cost efficiencies by achieving operations and maintenance ("O&M") savings through well-documented and robust plans to improve efficiency, (3) deploying technology and programs to enhance customer experience, reduce cost and increase consumer options and (4) decarbonization of our portfolio of generation facilities. Collectively, these initiatives are designed to improve customer experience and cost competitiveness, increase operational efficiencies, optimize capital allocation and deliver attractive investment opportunities. The Rate Plan is described in detail in the testimony of Company witness Kimberly Winslow.

1	Q:	Has Evergy explained the STP to the Commission Staff, Office of the Public Counsel		
2		and other stakeholders?		
3	A:	Yes, it has. The STP was filed with the Commission on August 26,2020. The Company		
4		has made several presentations on the STP, and I presented to these stakeholders on the		
5		STP goals and objectives as it pertains specifically to customer experience and our Rate		
6		Modernization Plan in February, 2021. (Schedule CAC-1) ¹ .		
7	Q:	How has Evergy set the stage for improved customer experience over the last few		
8		years?		
9	A:	From 2016 through 2021, Evergy replaced and/or consolidated more than a dozen core		
10		computer and information systems. A large part of the STP is rapid execution and		
11		deployment of projects designed to enhance customer satisfaction and customer experience		
12		from the deployment of these improved systems. Historically, customers have expected		
13		basics like reliable service and fair pricing, but modern customers have much higher		
14		expectations such as proactive notifications, personalized interactions, and connected		
15		experiences across channels. Transforming Evergy's customer experience to reflect the		
16		needs of today's customer is key to achieving our strategic goals.		
17	Q:	How has the replacement and consolidation of core computer and information		
18		systems benefited Evergy's customers?		
19	A:	Customers have benefited from these efforts since it is now easier to do business with		

¹ Evergy's Sustainability Transformation Plan Customer Experience Presentation by Charles A: Caisley, February 4, 2021.

20

21

22

Evergy. Over the last five years, Evergy focused on investing in modernizing major

foundational customer service platforms. AMI meters are a fundamental technology that

has unlocked automation, self-service, and cost savings for customers. As investments in

AMI metering and standardized, modern customer information systems are completed,
there are immediate customer experience opportunities to address. These opportunities
include: (1) remote connect and disconnect2; (2) improved and proactive outage
communication and expanded billing and usage notifications; (3) enhanced online portal
self-service for customers; and (4) data analytics that can be used to enhance or develop
rates and programs to better understand the needs of customers and help drive value-added
customer solutions.

A:

Q: Please explain how the widespread deployment of AMI meters throughout Evergy's Missouri service area has benefited Evergy's customers.

As I mentioned, the widespread deployment of AMI meters allows for more efficiencies to be incorporated into Evergy's contacts with its residential and business customers. These efficiencies include allowing remote connection and disconnection at much lower costs than the old practice of rolling a truck to accomplish a connection or disconnection. The Company also has the ability to implement expanded TOU rates and other "modern" offers that have a potential to benefit many of Evergy's customers. There are also more self-service options available including outage notifications and customer usage alerts.

In addition, there will be future opportunities for expanded automation processes and we will be filing waivers for some Chapter 13 rules to fully take advantage of that automation and improved experience for the customer. In this case, we are filing for Chapter 13 waivers for Subscription Pricing Pilot Program and Advance Easy Pay Program, as referred to in Ms. Winslow's testimony. Finally, AMI deployment has the

² Evergy will be requesting approval to implement remote connect and disconnect procedures in its Application, <u>Re Application of Evergy Metro</u>, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West Request For a Waiver for Various Tariffs and Regulations Related to Automated Metering Infrastructure, File No. EE-2022-0071.

potential for significant customer service enhancements. Customers with AMI meters have
access to expanded digital tools to manage their energy usage including energy saving tips,
weekly energy reports and rate comparison to determine if TOU rates are a good fit for
their home. Additional benefits include improved billing accuracy and reduced manual
effort in reading meters monthly. This drives down costs and reduces safety risk to Evergy
employees. Customers experience reduced wait time when turning on service with the
automated turn-on/reconnect/disconnect capabilities of the meter. As noted above,
customers in Missouri can now enroll in outage notification and enjoy an enhanced
customer experience during outages. In addition to these visual benefits to customers,
Evergy is also providing safety benefits to the customer through AMI meters via the
temperature alarms, line and load side voltage checks and real time data analytics that can
detect issues occurring at the meter. A fully deployed AMI network sets the stage for future
benefits including new customer programs such as prepay programs, other advanced rate
design options and home energy insights. It can also provide operational data to potentially
identify immediate or future system issues that will help Evergy improve system reliability
for our customers.
Can you describe Evergy's efforts around its online presence, including social media
and electronic transactions? How does this impact customer experience?
Evergy was an early adopter of electronic portals and has seen the importance of a strong
digital platform for more than a decade. All customers are different. Some customers
prefer talking to a representative on the telephone and paying their bill through the mail.
However, a growing segment of customers prefers to find information on the internet and

to conduct business online. To accommodate those customers, Evergy has had a robust

Q:

A:

digital and online strategy for more than a decade. Our focus here is to provide online and mobile solutions that work for our customers.

0:

Currently, Evergy has a mobile-optimized website as well as highly utilized authenticated electronic transaction portal called MyAccount. As of the end of 2021, more than 64% of Evergy's Missouri customers have online account profiles and can interact with our self-service tools. This promotes customer satisfaction and overall customer experience with the Company.

Evergy has also developed multiple social media platforms. Currently, Evergy has YouTube, Facebook and Twitter feeds. Evergy uses these platforms to engage customers in a variety of ways. They convey real-time information that is not sought on Evergy's website. They also are used as a customer service platform, responding to customer service inquiries or complaints. Finally, these platforms are more dynamic than the corporate website or authenticated portals and allow for real time discussions and information dissemination to Evergy customers. For example, during a recent weather event due to extremely high winds in December 2021, Evergy had nearly 200k customers companywide without power. Evergy took to each of these social media platforms, in addition to its traditional website outage map, to inform customers of our progress to restore power. Customers engaged with Evergy through various channels and junctures of the outage restoration that met their need, their availability, or their preference to engage.

- Please describe efforts to improve customer experience at your Customer Contact Center.
- A: Most recently as part of the technology upgrades and consolidations, Evergy Missouri customers benefited from an update to the automated telephone system ("ATS"). The new

Interactive Voice Assistance ("IVA") offers increased self-service functionality including both English and Spanish options.

0:

A:

To support the new IVA technology, Evergy also upgraded the telephony infrastructure and consolidated it to place both our Kansas and Missouri contact centers on a single call platform. This prepares Evergy for a future contact center workforce that can support all customers regardless of location.

Like other customer contact platforms, we measure customer satisfaction with our contact center. To measure the effectiveness of the contact center, we survey customers who have interacted with our contact center and customer service representatives. We measure the effectiveness and customer satisfaction of those customers through our "Voice of the Customer" survey. The survey measures the overall satisfaction with the call experience, the ease of completing the task with Evergy and the satisfaction with the CSR. The results of these surveys continue to reflect high satisfaction with our CSRs and the overall call experience.

Do you track customer complaints to the bodies that regulate you?

Absolutely. In fact, we have a team of employees to resolve elevated customer complaints. These complaints include formal and informal complaints to regulatory staff, complaints that are elevated to an executive inside the company, Better Business Bureau ("BBB") complaints as well as media inquiries on behalf of customers. We take all customer complaints seriously. Any complaint that is elevated either to the Missouri or Kansas Commissions or within the Company is tracked to evaluate if the situation was handled correctly and to identify process improvements to potentially avoid the issue in the future.

Over the last ten years, we have worked diligently to mitigate and decrease the number of formal and informal complaints. We have worked even harder to make sure that any complaint that is lodged is fully investigated and resolved. Since 2011, Evergy has reduced formal and informal complaints by over 50%. In addition, in the past Evergy did not respond to complaints that came through the BBB, instead referring those issues to the Commission. In recent years, we have reviewed and resolved all BBB complaints and have the top rating given by the BBB.

How does Evergy approach customer service with its business customers?

Q:

A:

Evergy has a separate team of employees that work with its business customers. Typically, business customers have more complex requirements than residential customers and their bills are generally more difficult to understand with the various charges, such as a demand charge or facilities charge. Business customers often have higher voltage service, more complex bills with multiple accounts associated with one customer as well as various adjustments to their tariffed rates, such as an economic development rider.

Several groups at Evergy work together to advise and serve our business customers. Our goal is to be a trusted energy advisor to the businesses in our service territory. Evergy strives to accomplish this in several ways, which specifically includes its Business Solutions Center, Customer Solutions teams, and an economic development team.

The Business Solutions Center team is a resource for businesses that have annual electric usage below 1.5 million kilowatt hours (kwh). These customers have a specialized team trained in handling more complex business customer accounts. Evergy also has established a team of Customer Solutions Managers or key account representatives. This group works with Evergy's largest customers (annual usage of over 1.5 million kwh) and

with critical infrastructure customers that may not necessarily be Evergy's largest customers from a usage or revenue perspective. Lastly, the Evergy Economic Development team works with existing and potential new customers to help their businesses expand within and attract to the Evergy service territory. The Evergy Economic Development team is one of two utilities in the nation that are accredited by the International Economic Development Council. All these groups work hand-in-glove with our team in Delivery to ensure reliability issues are quickly addressed, that the customers are fully informed of their bill and that the customers know about Evergy's programs so that they may choose to participate in programs such as energy efficiency, demand response, sustainability, or electrification. Evergy has a strong relationship with its business customers, and we continue to improve those relationships through understanding what is important for these customers to thrive.

Q: How does Evergy seek to improve customer experience in the future?

A:

Customer expectations, both residential and business, continue to evolve and to increase. Customers do not judge our customer service relative to other utilities, but by what is commonplace in the market. For example, if a credit card company can send an email alert when a person's credit card is used to make a high dollar purchase or is outside the geographic area that the card is typically used, they do not understand why a utility cannot send a high bill alert or notify a person via text message when their power is out and when it is expected to be back on. We will continue to use customer research and data to expand how we interact with customers and to meet their growing expectations—whether on the phone with a customer service representative, in field operations, online or on a customer's

smartphone. We have made substantial progress over the last five years, and we will continue to work diligently towards the best customer experience possible.

A:

Q: How is Evergy's community involvement important to the success of its customers and the Company?

Evergy is a regulated monopoly and has 100 percent marketshare within tariffed service territory. This creates complete alignment between Evergy as a business and the customers and communities we serve. We only succeed and grow, if the communities we serve thrive and grow. This means we should prioritize customer service. This means we need to always prioritize regional and national rate competitiveness. And, this means that issues which impact our community necessarily impact Evergy. That is why we are significantly involved in the community and prioritize positively impacting the communities we serve.³

In addition to community involvement at a civic participation and policy formation level, Evergy remains committed to and aggressively involved in economic development in the communities we serve. This is important for several reasons. First, retaining, expanding and attracting businesses are important sources of jobs and tax revenue for the communities we serve. Energy is one of the key determinants on whether a company locates in Missouri, so our partnership and participation is an important part of successful economic development. In addition, by attracting large energy users to our service territory, it spread the fixed cost of our business over more kilowatt hours and puts downward pressure on rates through greater asset utilization. Despite headwinds caused primarily be the economic upheaval caused by the Covid pandemic, Evergy has been successful in our economic development efforts. ⁴

³ Evergy's 2020 and 2021 Community Involvement Reports are attached as **Confidential Schedule CAC-2**.

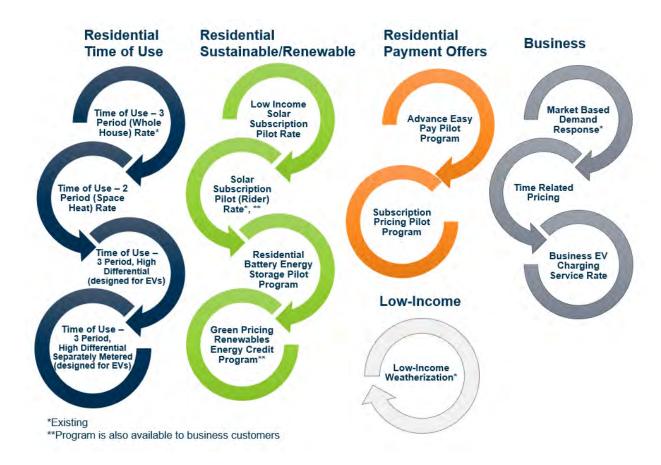
⁴ Evergy's 2019-2021 economic development reports are attached as **Schedule CAC-3**.

III. CUSTOMER CHOICE INITIATIVES AND RATE MODERNIZATION	111.	. CUSTOMER	CHOICE INITIATIV	/ES AND KATE	MODEKNIZATION	PLAN
---------------------------------------------------------	------	------------	------------------	--------------	---------------	------

- 2 Q: How is Evergy proposing to increase the program or rate choices for its customers in
- 3 Missouri?

A: Evergy is focusing on several new tariffs, offerings, and programs for increasing customer choice for its electric service. In 2020, Evergy developed a Rate Modernization Plan ("Rate Plan") to guide the Company on several identified rate objectives over a period of time. The Rate Plan provides a framework for Evergy that is both responsive to its historical regulatory obligations in Missouri and Kansas, but also provides a framework for the Company's future general rate case filings. The rates, programs and offers that Evergy is proposing within this rate case was borne from the Rate Plan. The Rate Plan has continued to evolve based on customer needs and outcomes of recent filings.

Below is a graphic of those new or existing programs that will be addressed in this filing by Evergy's witnesses. Evergy is proposing 10 new programs and revisions to four programs. The details for these proposals will be addressed in the direct testimonies of Evergy witnesses Kimberly Winslow, Brad Lutz, Marisol Miller and Ryan Hledik. I will briefly discuss our Rate Plan and summarize our proposed offers within this rate case below.



Before you discuss the specific proposals, would you explain why Evergy believes that it is in the public interest to provide its customers with more choices in the way they receive and pay for their electric service.

Q:

A:

First and foremost, customer surveys and our daily interactions with our customers indicate that higher customer satisfaction is directly related to customer choice. Customers expect to have choices as they make their purchasing decisions in most areas of the marketplace, and this is no different in their purchasing of electric services from Evergy. Customers are no longer satisfied with one option, based upon a single rate in a tariff. Customers want the ability to choose for themselves the service option that makes most sense in their individual situations. As I have already explained, customers do not judge our customer service relative to other utilities, but by what is commonplace in the market—and customer

choice is an important factor in their evaluation of the services of the Company and others
in the marketplace.

3 Q. What are the primary goals of Evergy's Rate Plan?

4

5

6

7

8

9

10

11

12

15

16

17

21

A: The Rate Plan is intended to guide the Company on several identified rate objectives over a period of time. The Rate Plan provides a framework for Evergy that is both responsive to its historical regulatory obligations in Missouri and Kansas, but also provides a framework for updating the Company's rate plans and guiding future general rate case filings. Evergy has a long history of listening to our customers and working to best understand what they want concerning energy and believes that any approach taken for establishing new, innovative rate structures should be measured and reviewed in order to maximize results and customer engagement. We have previously shared our Rate Plan with the Commission.⁵

13 Q: What are the primary objectives of the Rate Plan?

- 14 A: As explained in detail by Ms. Winslow, the primary objectives of the Rate Plan are to:
 - Create rates that are independent of end use requirements
 - Bring rate structures closer together across jurisdictions
 - Enable business growth
- Simplify rates and increase pricing transparency
- Provide greater customer choice
- Increase customer satisfaction
 - Leverage CIS and AMI investments
- Develop price signals to increase grid efficiency

⁵ Evergy's Sustainability Transformation Plan Customer Experience Presentation by Charles A: Caisley, February 4, 2021; Rate Design Time of Use Case Report, June 15, 2021; Time of Use Case Rate Design Plan On the Record Presentation by Brad Lutz and Kimberly H. Winslow on September 28, 2021.

1	Q:	What are the new or revised programs that Evergy is proposing in this case?
2	A:	As shown in the above graphic, Evergy is proposing several new (and revised) programs
3		in this rate case, which are largely borne out of Evergy's thought leadership in its Rate
4		Plan, including:
5		• TOU Programs – including the existing (revised) 3-period; a 2-period (new); two
6		high priced differential TOU programs designed with the EV driver in mind (new)
7		Innovative Payment Offers
8		o Subscription Pricing Pilot (fixed bill offer) (new)
9		o Advanced Easy Pay Pilot (prepay offer) (new)
10		• Distributed Energy Resources ("DER") Programs and Tariffs
11		o Low Income ("LI") Solar Subscription Pilot Program (new)
12		o Residential Battery Energy Storage Pilot ("RBES") Program (new)
13		o Green Pricing Renewables Energy Credit ("REC") Program (new)
14		o Solar Subscription Rider (existing/revised)
15		• Business
16		 Market Based Demand Response (existing/ revised)
17		o Time Related Pricing (new)
18		o Business EV Charging Service (TOU) (new)
19		• Low-Income
20		 Low-Income Weatherization (existing/ revised)
21		These programs and rates are described in detail in the direct testimonies of Company
22		witnesses Kimberly Winslow, Brad Lutz, Marisol Miller and Ryan Hledik.

1	Q:	Other stakeholders have indicated that mandatory, or opt-out, TOU rates are a	
2		preferred rate design option for residential customers. Do you agree?	

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

A:

No, I do not agree. Evergy and parties were able to come to an agreement in 2018⁶ ("Rate Design S&A") that Evergy would offer an opt-in TOU rate. The rate has a significant pricing differential (6 times) between super off peak and off peak to affect participant behavior change. The offer has been very successful from many perspectives. As discussed in Ms. Winslow's direct testimony, Evergy exceeded the Rate Design S&A enrollment target of 3,500 customers by 70% with over 6,000 active enrollments as of December 31, 2021⁷. In addition, Evergy executed on all of its commitments from the Rate Design S&A as it pertains to TOU and completed both an interim and final evaluation, measurement and verification ("EM&V") reports through an independent third-party. The EM&V findings further reinforced that the TOU offer fulfilled the objectives of offering choice and increasing customer satisfaction, reducing system coincident peak demand, and aligning pricing structure with cost causation. Our research has also indicated that customers are averse to mandatory TOU rates – 50% TOU participants in research that we conducted indicated that they would be less satisfied with Evergy if TOU was a mandatory rate.

While one could argue that only 2% of Evergy's customers chose the TOU offer, I would argue that it is a step in the right direction to provide choice to customers. These customers are highly engaged and satisfied. Evergy believes that TOU opt-in rates for residential customers are an important choice for utilities to offer its customers and this

⁶ Non-Unanimous Partial Stipulation and Agreement Concerning Rate Design Issues. Case No. ER-2018-0145 and ER-208-0146, filed September 25, 2018, Section 2

⁷ On 12/31/2021, Evergy had 3,172 active TOU enrollments in Missouri West; 2,908 active TOU enrollments in Missouri Metro; for a total of 6,080 active TOU enrollments.

rate offer was foundational and cogent to Evergy's development of tools and education that customers need to understand pricing and cost-causation. Using this knowledge, Evergy is proposing to expand from its existing, singular 3-period time-based rate to the addition of a 2-period TOU rate and two options that include the same 3-period high differential TOU rate that is designed with the EV driver in mind. However, one option provides for the EV driver/customer to install a separate meter to measure EV charging so that they may choose a different program that is more suitable for their whole-house usage. Evergy's proposed TOU rates are designed with a price differential to incent behavior change and are designed for various customer lifestyles and/or technology choices that the customer has invested, such as all-electric systems or EVs.

Q.

A.

In addition, the Commission recently indicated approval of Evergy's TOU rate for transit bus electrification in its agenda session on December 22, 2021. In this rate case, we are also presenting the TOU rate for business (fleet) EV customers, which I will further address below.

- In addition to the TOU rates that you describe above, what other program choices is Evergy proposing in this case?
- Evergy is proposing two customer payment pilots, which include a Subscription Pricing Pilot Program and Advance Easy Pay Pilot Program. The Subscription Pricing Pilot Program offer will provide residential customers with an entirely fixed monthly electricity bill. Evergy's proposed design also provides for two additional add-ons for the customer to choose, including a smart thermostat and clean energy. Company witness Ryan Hledik of Brattle provides detailed testimony on the proposed framework of the subscription pricing program. The Advance Easy Pay Program is a payment plan similar to other

industry commission-approved prepay programs. Both of these programs provide
customers an opportunity to choose what works best for their household, which is
dependent on number of family members, household income and other factors. Evergy is
proposing these as pilots so that both Evergy and the Commission learn on how customers
want to interact with its utility and what customers expect from its utility now and in the
future. One size does not fit all.

A.

Q. What renewable rate or program choices is Evergy proposing in this case that aid customer's sustainability goals?

Evergy has been a leader in working with its customers on their sustainability goals – both residential and commercial. In Evergy's 2018 rate case, the MPSC approved a Solar Subscription Pilot Rider ("Schedule SSP"). Evergy has enrolled approximately 1100 customers in the pilot and is seeking approval from the MPSC on its Certificate of Convenience and Necessity to construct. It is proposing revised changes to the program to move it from a pilot to a permanent program in this filing.

Evergy understands from its customer research that customers want sustainable options.⁸ Evergy is driving towards a more renewable generation portfolio; however, in the meantime, it must be innovative and creative to meet customer needs. Evergy also needs to understand the behind-the-meter ("BTM") technologies that customers are adopting that impact the grid. We cannot bury our head in the sand; we need to take the opportunity to learn and work with our customers on understanding the drivers of this BTM adoption, grid impact and how BTM technologies can be used for the benefit of the grid.

 $^{^8}$ Evergy's Sustainability Transformation Plan Presentation to KCC, May 24, 2021 is attached as Confidential Schedule CAC-4

1	Q.	What rate or program	choices is Evergy	proposing or	revising for	business c	ustomers
---	----	----------------------	-------------------	--------------	--------------	------------	----------

- 2 in this case?
- 3 A. I will later discuss Evergy's proposal for its TOU Business EV Charging Service Rate and
- 4 the importance of the approval of this rate by the Commission in light of the burgeoning
- 5 EV opportunities for customers. We are also submitting a revision to the Market Based
- 6 Demand Response tariff to better facilitate participation and market opportunities. Mr.
- 7 Lutz and Ms. Miller also present the Time-Related Pricing tariff, which is a new program
- 8 that offers business customers energy pricing that is time differentiated and based on
- 9 historical locational marginal prices from the market.

10 Q. What program choices is Evergy proposing or revising for low-income customers in

- 11 this case?
- 12 A. In addition to the new low-income solar subscription program, Evergy is requesting a
- change to it Low-Income Weatherization tariff to allow for unspent annual funding to be
- moved to Dollar-Aide. Dollar-Aide helps eligible individuals and families by assisting
- with their utility bills to avoid loss of service. The program has helped thousands of
- families in our community and this change will positively impact our customers in need.

17 Q. What customer research has the Company performed to support that its customers

- prefer choice in the offering of rates by Evergy?
- 19 A. Over the years, Evergy has performed customer research to supports its approach in
- providing its customers choice when selecting a rate. Evergy has performed customer
- 21 research on customer choice in earnest since 2019, and details of this customer research
- supporting customer choice was shared in the Company's Rate Design TOU Report and

Evergy's TOU On the Record Presentation⁹. Even most recently, quantitative research performed in November 2021 further reiterates that their customer satisfaction would increase if more options were available – over 75% affirmed that satisfaction with Evergy would increase from a little to a lot. Nearly half of the respondents affirmed that Evergy should offer more optional rate plans. The research supports that all customers are different and providing choice enables the customer to evaluate options that are best for their lifestyle, their income level, and use.

IV. ELECTRIFICATION TRANSPORTATION INITIATIVES

Has Evergy proposed transportation electrification initiatives in another case that is pending before the Commission?

Yes. The Commission advised in an agenda meeting on December 22, 2021, that while it would approve several elements of Evergy's proposed filing in Docket Nos. ET-2021-0151 and -0269, it advised that it would not approve the Commercial Electric Vehicle ("EV") Charger Rebate Program, Business EV Charging Service Rate and Customer Education and Program Administration program to support the Commercial EV Charger Rebate Program and the Business EV Charging Service Rate. The MPSC suggested that Evergy revise and readdress these three areas in a future filing.

Q: Why are these three TE initiatives important to Evergy?

A:

Q:

A:

Consistent with our STP, Evergy wants to grow our business but do so in a beneficial way with our communities and customers. The last non-electrified segment of the world economy is transportation. It is an important time for utilities to be proactively and strategically planning for this impact given the avalanche of preemptive carbon

⁹ Rate Design Time of Use Case Report, June 15, 2021; Time of Use Case Rate Design Plan On the Record Presentation by Brad Lutz and Kimberly H. Winslow on September 28, 2021

1		announcements by auto manufacturers 10. These announcements will have an enormous			
2		impact on the electric industry. Utilities cannot take a wait and see approach. We need to			
3		be planning for this change and working with our customers now.			
4	Q:	How has Evergy revised these initiatives?			
5	A:	Evergy appreciates the feedback that the Commission provided in its agenda session.			
6		Evergy understands the concerns presented and revised the initiatives with greater detail.			
7		The overall budget of the Commercial Rebate Program ("CRP") has been reduced by			
8		approximately 30% (from \$10.0M as filed to in February 2021 to \$6.9M). This reduction			
9		is the result of the following changes:			
10		• Elimination of the Highway Corridor use case			
11		• Elimination of the Public Level 2 use case			
12		• Reduction of the budget for Workplace/Fleet Level 2 installations			
13		• Reduction of the budget for Fleet DCFC installations			
14		• Reduction of the budget for Public DCFC stations (non-highway corridor)			
15		Evergy is also proposing a \$1.03M customer education and program administration			
16		budget, commensurate with the CRP budget reduction, or 15% of the overall CRP budget.			
17		Mr. Lutz addresses Staff and the MPSC's feedback on the Business EV Charging Service			
18		Rate and has adjusted the pricing to reflect the revenue increase proposed in this case.			

¹⁰ Ford announced that it will invest \$29 billion in autonomous vehicles and EVs through 2025, a dramatic ramp-up of its spending in those areas. In addition, the Alliance for Automotive Innovation, a group representing auto makers producing 99% of the cars and trucks sold in the United States, announced that its members will invest \$250 billion in vehicle electrification by 2023.

V. EVERGY'S RESPONSE TO COVIDPANDEMIC

2	Q:	What effect has the COVID pandemic had on EMM's customers and communities
3		and how has the Company responded?

Q:

A:

A:

The COVID pandemic and resulting economic crisis has created an urgent and unprecedented need for assistance. In 2020, Evergy donated \$1.8 million for COVID relief efforts. These donations were directed to 120 local agencies to help with emergency efforts, economic development programs, workforce training, and customer payment assistance. Evergy's COVID relief effort was in addition to its annual \$6.5 million in community support to hundreds of agencies throughout Evergy's Missouri and Kansas service areas. Evergy's community support donations are not included in customer rates.

With new COVID federal dollars available for rental and utility assistance, Evergy conducted approximately 500 outreach and social media events in 2020 and 2021 to connect and advise customers with bill assistance applications. Additionally, Evergy launched a one-stop location on its website with all assistance programs, links, helpful hints, and videos. Since 2020, these efforts have helped secure more than \$67 million in utility bill payment assistance for Evergy customers.

How would you describe Evergy's customer responsiveness to COVID and its impact on customers and Evergy?

Evergy has been an industry leader in our response to customers' needs during the COVID pandemic. Evergy was one of the first U.S. utilities to announce a voluntary moratorium on disconnection of service for non-payment. That moratorium included waving all charges, fees and deposits typically associated with non-payment or late payment of bills. The Company has also implemented a number of other programs and modifications. EMM

witness Kimberly Winslow provides a comprehensive list of customer assistance programs, which include Economic Relief Pilot Program, Dollar Aide, Income Eligible Weatherization ("IEW"), Energy Savings Kit, Income-Eligible Multi-Family program, Low Income Home Energy Assistance Program, Emergency Rental Assistance Program and Pay As You Save.

What financial impact has the COVID pandemic had on the Company?

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

Q:

A:

Evergy and our customers continue to face uncertainty as to the longer-term customer and economic impact of COVID. The economy has improved, and the vaccines have been very helpful in reducing hospitalizations and death from COVID. However, Evergy faces an unknown, and as yet indeterminable risk, of collection due to the substantial number of customers that continue to be in a past due status and are not facing disconnection. Evergy is seeing continued growth in unpaid balances due to weather moratoriums and significant periods of disconnect moratoriums due to the pandemic. While we have been very successful in giving customers multiple options to get on payment arrangements, collecting millions of dollars sooner than would likely have occurred without those programs and helped customers maintain electric service during this challenging time, the length of time to completely pay off those receivables has continued to climb and is an increased risk significantly above what we would consider normal levels. In fact, the Missouri customer arrears balances are 30% higher from the beginning of our tracking in April 2020 to the same time period one year later in April 2021. As a result of these impacts of increasing receivables and period of lower write offs, we are requesting a bad debt expense tracker that is discussed in more detail in the testimonies of Darrin Ives and Ron Klote.

1		On January 13, 2021, the Commission approved Evergy's application for an AAO
2		to accumulate and defer to a regulatory asset for consideration of recovery in future rate
3		case proceedings extraordinary costs and financial impacts incurred as a result of the
4		COVID-19 pandemic. 11
5	Q:	Does this conclude your testimony?
ີລ	А٠	Yes

¹¹ Report and Order, p. 46, Re Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for an Accounting Authority Order Allowing the Companies to Record and Preserve Costs Related to COVID-19 Expenses, File No. EU-2020-0350 (January 13, 2021)

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc. d/b/a Evergy)	
Missouri Metro's Request for Authority to)	Case No. ER-2022-0129
Implement A General Rate Increase for Electric)	
Service)	

AFFIDAVIT OF CHARLES A. CAISLEY

STATE OF MISSOURI)	
)	SS
COUNTY OF JACKSON)	

Charles A. Caisley, being first duly sworn on his oath, states:

- My name is Charles A. Caisley. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Senior Vice President – Public Affairs and Chief Customer Officer.
- 2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Evergy Missouri Metro consisting of thirty (30) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.
- 3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

CA Caisley
Charles A. Caisley

Subscribed and sworn before me this 7th day of January 2022.

Notary Public

My commission expires: $\frac{4/2u/w25}{}$

ANTHONY R, WESTENKIRCHNER
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 26, 2025
PLATTE COUNTY
COMMISSION #17279982

Page 31 of 63



Sustainability Transformation Plan (STP)

Enhanced Customer Experience Chuck Caisley





STP and Related Benefits Overview

STP Customer Strategy & Near-Term Priorities

STP Vision of Customer Experience

Continuous Delivery Model

Summary





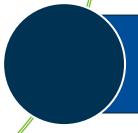
What is Evergy's Sustainability Transformation Plan?



Evergy's five-year strategic plan accelerates work on creating a **forward-thinking**, **customer-centric and sustainable energy company**



Focused on additional decarbonization, grid modernization, improved customer experience and cost competitiveness



Positions the company to increase operational efficiencies, optimize capital allocation and deliver attractive investment opportunities





Stakeholder Benefits from the STP

CUSTOMERS

✓ Maintains Affordability

- Capital investments targeted to enable long-term and sustainable cost savings of an expected ~25% non-fuel O&M reduction by 2024
- Significant fuel and purchase power savings of ~\$145M from 2019 through 2024

Improves Customer Experience

- Enables automated outage communications
- Expands digital communications, transactions and customer self-service options
- Modernizes rate structures to offer additional rate options tailored to different types of residential customers

✓ Improves Reliability & Resiliency

 Capital investments in grid automation, data handling and analytics capabilities and communications infrastructure to improve grid reliability, reduce restoration times and increase overall grid resiliency

COMMUNITY

Provides Regionally Competitive Rates

 Cost savings minimize rate increases over the period of the plan and is expected to improve regional rate competitiveness

✓ Enhances Economic Development

- Job creation as a result of investments in grid modernization projects and renewable generation
- Investments in renewable energy and grid modernization will help attract companies by improving cost competitiveness, reliability and overall sustainability

✓ Honors Community Commitments

- Maintains Evergy's 'People First' culture
- No merger-related involuntary layoffs
- Maintains local control and current community involvement and investments
- Honors existing regulatory agreements while providing a safe work environment for employees and meeting the needs of customers

Schedule CAC-1 Page 4 of 22

ENVIRONMENT

✓ Delivers Cleaner Energy

- An Integrated Resource Plan that builds on Evergy's focus on sustainability with increased investment in renewable energy, including solar energy, and battery storage and expanded energy efficiency programs
- Pursues legislative and regulatory policy changes that would allow for more rapid decarbonization through accelerating retirement of coal plants
- Investments in grid modernization will enable easier access to and development of distributed generation and customer facing grid-edge technology

✓ Engages Stakeholders

 A robust process to engage our customers, regulators, employees and shareholders in Evergy's transformation to a low-carbon, resilient utility

STP Workshop - February 2021 Public Attachment 6

Page 35 of 63

Key Areas of STP

- Grid Modernization: Create detailed plans to execute on grid modernization which promotes improved resiliency and grid capabilities
- Cost Efficiencies: Achieve O&M savings through well-documented and robust plans to improve efficiency
- Customer Experience: Deploy technology and programs to enhance customer experience, reduce cost and increase consumer options
- Decarbonization: Develop an Integrated Resource Plan (IRP) which balances the needs of various stakeholders

Decarbonization will be discussed through IRP Stakeholder meetings



STP Customer Strategy and Near-term Priorities





STP Customer Strategy Guideposts



STEADY IMPROVEMENT IN CUSTOMER EXPERIENCE

- Create a true omni-channel customer service and interaction
- An increasing focus on both digital self-service and valueadded human interactions
- A five-year roadmap with oneyear executable increments.
- Non-industry benchmarking with outcome-based KPI's and metrics
- A collaborative roadmap for needed policy changes



O&M REDUCTIONS BEYOND EXISTING SYNERGIES

- Hard cost reductions over a five-year period achieved through:
 - Increasing automation
 - Increasing digital external and internal functionality
 - o Universal customer service
 - Streamlining dependent processes
- Using a portion of the incremental O&M savings to fund or offset rate impacts of investment in customer experience improvement strategy



BENEFICIAL REVENUE GROWTH

- Increasing traditional regulated revenue through:
 - Expanded economic development efforts
 - o Beneficial electrification
 - o Modernized rate structure
- Increasing non-traditional or performance-based revenue, such as energy efficiency programs



TARGETED CAPITAL INVESTMENT

- Maximize utilization of core platform investments like AMI and customer information systems
- Create an IT and capex roadmap that reduces bolt-on projects
- Create an agile project team to work on continuously updating customer interface enhancements on a 4-to-8week cycle
- Fund and improve data analytics and digital process automation





2021 Strategic Priorities

Customer Forward: Successful implementation in January of Customer Forward project, on budget and on time.

Customer and Community Solutions (CCS) Reorganization: realignment of CCS organization to achieve STP cost savings, agile project management and omni-channel customer interaction. Bring focus and significant improvement to Billing department. Enabling increased automation in Metering and Customer Contact areas. Streamline support areas.

Customer Experience Enhancements: Automation and self-service across key customer-related functions, including outage management and notifications; billing and bill inquiry; usage management; account opening/change; and other customer channels.

Rate Design and Modernization: Work with stakeholders to develop more advanced/modern rate structures. Areas of focus include time of use rates, distributed generation rates, pre-pay programs, beneficial electrification rates and subscription rates.

Electrification: Build stakeholder support for continued investment in and advancement of beneficial load building through electrification. Areas of focus include continued investment in retail charging particularly in areas at-risk or underserved areas, fleet electrification, logistics electrification and home charging.

MEEIA/KEEIA: Continue MEEIA Phase 3 in Missouri. In Kansas advance energy efficiency programs, or if necessary, enabling legislation.





Customer Forward Benefits to Customer Experience

Consistent and enhanced levels of customer service

- Enhanced customer alerts and notifications to include new outage notifications and improved messaging for start/stop service.
- Small business customers will have the ability to pay by credit card.
- Customers payments through real-time channels will automatically initiate reconnect
- Evergy Missouri customers will move to consolidated Automated Telephone system (ATS) in 2021 – Intelligent Voice Assistance self-serve functionality in both English and Spanish available in Q2 2021





Near-Term Customer Experience Initiatives

Optimize Use of AMI capability

Proactive outage communication and expanded billing and usage notifications

Enhanced online portal self-service for customers

Data analytics programs to better understand the needs of customers and help drive value-added customer solutions

Consolidated bill design focused on simplifying the customer experience



STP Vision of Customer Experience Enhancement





Future Customer Experience Channel Mix

Optimizing channel mix based on consumer needs and accelerating digital transformation will enhance customer service while providing more consistent customer experience and lower operating costs





Channel evolution driven by customer preferences influenced by Right Channel, Right Place, Right Time

Single Channel

Traditional

Phone, direct mail and/or face-to-face interactions

Blended Channel

Transactional

Physical and digital channels working independently for customer interactions

Multi-Channel

Combination

Single view of customer, with multiple touchpoints seen as part of the same brand, but functions operating in silos

Omnichannel

Experiential

Consistent and united customer experience with a brand across complementary channels within the purchase journey

Legend







Customer & Community Solutions (CCS) Vision Blueprint

KNOW YOUR CUSTOMERS

- Enhanced customer engagement (CRM)
- Personalized and differentiated experiences
- Providing customer choice

EASY TO DO BUSINESS

- Improved digital interactions
- Proactive customer engagement (360 view)
- Omnichannel (3-5 key channels)
- Nextgen contact center technologies



GROWING THE BUSINESS

- Economic development
- Beneficial electrification (customer, utility)
- Flexible rate choices
- Unlock customer benefit through value added solutions

MASTERING THE BASICS

- Data-driven operations (KPIs, Analytics)
- Continuous process improvement (Automation)
- Employee enablement (Knowledge mgmt. tools)
- Outcome-based culture

Align our core strengths – people and capabilities for providing energy – with new products/services and digital enablement to

improve our stakeholder experience

← Increased O&M efficiency

Increased regulated revenue

Partner enablement

Increased non-regulated revenue

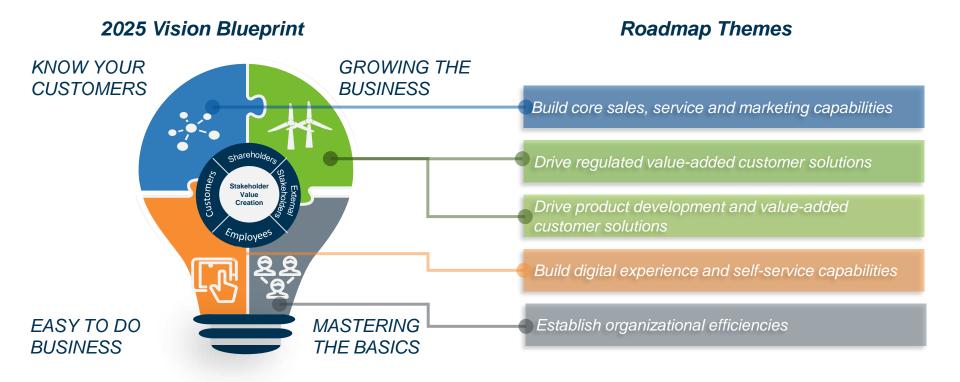
Customer & employee engagement

Shareholder value





The CCS Vision Blueprint and STP Alignment





Setting the Foundation

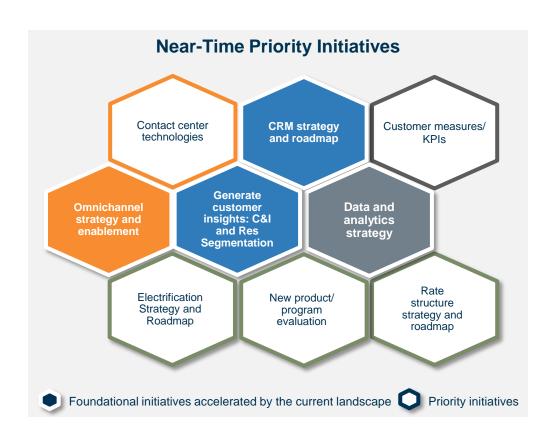
Build core sales, service and marketing capabilities

Drive regulated value-added customer solutions

Drive product development and solutions

Build digital experience & self-service capabilities

Establish organizational efficiencies



Rate Modernization

Drivers

Multiple service territories in MO and KS

Customers want choice

Implicitly promote beneficial electrification and grid benefits

Proper price signals that enable adoption of emerging energy technologies that are most beneficial to the grid

More equitable rates across diverging customer classes and subclasses

Commission interest around time-of-use and distributed generation rates

Objectives

Create rates independent of end use requirements

Bring rate structures closer together across jurisdictions

Enable business growth

Simplify rates and increase pricing transparency

Provide greater customer choice

Increase customer satisfaction

Leverage CIS and AMI infrastructure

Develop price signals to increase grid efficiency



Agile Project
Management:
Continuous Delivery
Model





Continuous Delivery Model Structure

Principles for design

- 6-8 members in each squad
- Members from all key functions based on specific journey / outcome
- >80% time commitment to squad
- Strong performers that are highly respected within organization
- Each squad member has a specific role, but also has a collective squad objective to work towards
- Shared support resources are leveraged part time based on team needs

Example of design Journey Owner Developers Business Analyst Front, backend, or full Does analysis on stack; Will be pooled business impact, cust resource with typically at experience drivers, least one per team etc.; 1-2 per team Agile squad **UX Designer** Marketer May be shared May be shared across teams across teams depending on what depending on what they're working on **Subject Matter Experts/** they're working on **Functional Liaisons** Liaisons to run tower such as contact center and account management Tech role Business role Tech or Business Role Note: some roles may be dotted line to other functions

STP Workshop - February 2021 Public

Schedule CAC-1 (inside CCS team or outside the division)
Page 18 of 22
Page 49 of 63



Sample Journeys and Features to be Deployed for Improved Customer Experience

SAMPLE FUNCTIONALITY **NOT EXHAUSTIVE**



Account opening or change

Online enrollment expedition (SWIFT) to provide error messages and automatically funnel exceptions to reps for support

Adjusted incentives to reward reps for accurate collection of email addresses

* Smart dispatch tool creates dense, high utilization schedules for field force and determines most efficient routes for travel

Digital welcome packet with opt-in to push comms tools



Billing

eBill and online pay campaign to advertise online payment tools through primarily owned marketing channels

Smart bill redesign to apply human-centric design principles and rigorous user testing; convey using easy-to-understand terms

Continued site optimization to improve speed, load time, and page responsiveness

Fast authentication via "voiceprint" to verify identity, reduce call times ~20-40 seconds



Bill inquiry

★ Chatbot → Intelligent agent for basic questions, escalating queries when necessary

Robotic process automation (RPA) allows for "zero touch" processes by replicating human actions across business flows

Standardized payment plans (e.g., cold weather, short term) available through self-service

Proactive education on financial resources when payments are

Personalized video bill tailored to customer's account and rates

Adjustable due date for all customers, not just those in federal income programs

Service order tracker provides real-time updates (e.g., dispatch, est. completion)



Outage management

Campaign to increase outage notification opt-in for outage alerts via SMS

Detailed outage notifications, with estimated time-to-restore, link to outage map, and time to next update

Full deployment of AMI capabilities to detect outages across all service areas



Usage management

High bill notifications alert customers of abnormal electricity usage before end of billing period

★ Improved site search functionality helps customers find the right information

Sentiment analysis uses NLP to help determine which customers to escalate

Agent Al support 'listens' to calls to generate transcription events and provides timely, relevant info to

Exemplar featured

Continuous feedback collected from customers (e.g., time on page, error rates, number of handoffs) to measure sentiment in real-time, enable dynamic interventions, and redesign touchpoints

Integration across currently siloed data sources and platforms



Summary





STP Continues Progress Toward Enhanced Customer Experience

Delivers omnichannel customer experience driven by customer preferences Grows performance-based revenue Investments in core systems maximizes benefit to customers Builds processes that help us meet customers' needs

Schedule CAC-1

Page 21 of 22



Important Information

• The Sustainability Transformation Plan consists of a number of forward-looking elements, including but not limited to capital investment plans, expense reduction charters, revenue generation plans and earnings estimates. These forward-looking elements are intended to be accurate when made but involve risks and uncertainties that could cause actual results to differ materially from forward-looking information comprising the Sustainability Transformation Plan. Consequently, such forward-looking elements of the Sustainability Transformation Plan are not known or measurable at this time.



SCHEDULE CAC-2 CONTAINS CONFIDENTIAL INFORMATION NOT AVAILABLE TO THE PUBLIC.

ORIGINALS FILED UNDER SEAL.

2020 SCORE CARD



economic development

- \$1,250,053,689 in NEW Capital Investment from 17 PROJECTS
- √ 3,875 new jobs QQQQQ
- \$20,620,204

 New Annual Revenue to Evergy



\$40,165,384Economic Impact to Evergy



✓ 45+ MW in New Demand Growth



Site Selection Magazine Names
Evergy a Top U.S. Utility in
Economic Development.





COVID-19 Relief Programs and Grants



- Hometown Recovery Grants
 to 44 economic development
 organizations totaling \$800,140
- Partnered with Blane Canada to conduct territory-wide business impact survey and access to the Response Network webinars

OUR MISSION 🔀

As a leading and trusted energy partner, the mission of the Economic Development team is to attract new companies, retain and expand existing customers while making strategic partner investments that result in the creation of new load growth. We strive to increase shareholder value and improve the quality of life in the communities we serve.

ECONOMIC DEVELOPMENT IS A TEAM SPORT

Shout out to our internal Evergy friends and colleagues who made 2020 a success. Thank you!

- Government Affairs
- Distribution Planning
- Transmission Planning
- Transmission and Substation Engineering
- Business Center

- Regulatory
- Central Design
- Customer Service Managers
- Energy Efficiency
- Clean Energy/Renewables

✓ TARGETED INDUSTRIES OUTREACH











to promote announcements and programs



LOCAL PARTNER PROGRAM **INVESTMENTS**







✓ DEMAND BY INDUSTRY TYPE

Deloitte / Wichita, KS

NEW JOBS: 5 / INVESTMENT: \$20,000,000

Great Plains - Kubota / Salina, KS

NEW JOBS: 250 / INVESTMENT: \$53,000,000

NEW JOBS: 127 / INVESTMENT: \$118,000,000

(3) Lineage Logistics / Olathe, KS



✓ PROJECT WINS

Logistics: 7

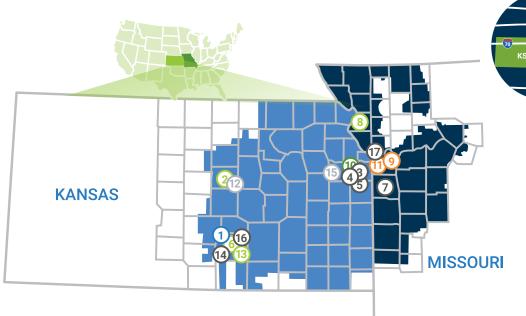
Manufacturing: 4

Data Center: 2

Office: 1

Food Processing: 2

Advanced Energy: 1





- (10) BE Aerospace/Raytheon Technologies / Lenexa, KS NEW JOBS: 200 / INVESTMENT: \$37,500,000
- Vail Technology / Kansas City, MO NEW JOBS: 4 / INVESTMENT: \$1,385,000
- Tony's Pizza Schwans / Salina, KS NEW JOBS: 225 / INVESTMENT: \$700.000.000
- Open Road Brands / Wichita, KS NEW JOBS: 24 / INVESTMENT: \$15,358.689
- Plains Cotton Cooperative Assoc. / Clearwater, KS NEW JOBS: 22 / INVESTMENT: \$12,500,000
- Pretzel Inc. / Lawrence, KS NEW JOBS: 281 / INVESTMENT: \$88,000,000
- Amazon / Park City, KS **NEW JOBS: 700 / INVESTMENT: \$25,000,000**
- Melaleuca, Inc. / Kansas City, MO NEW JOBS: 2020 / INVESTMENT: \$33,000,000
- Cold Point / Edgerton, KS Chewy Inc. / Belton, MO NEW JOBS: 30 / INVESTMENT: \$25,500,000 NEW JOBS: 1.600 / INVESTMENT: \$109.000.000
 - Lifeline Foods / Saint Joseph, MO NEW JOBS: 13 / INVESTMENT: \$12,000,000
- **Ag Eagle** / Wichita, KS NEW JOBS: 68 / INVESTMENT: \$1.610.000

Accelerate 360 / Olathe, KS

NEW JOBS: 120 / INVESTMENT: \$17,000,000

Vail Technology / Blue Springs, MO NEW JOBS: 4 / INVESTMENT: \$1,200,000

Schedule CAC-3

Attachment 6 Page 56 of 63 Kansas Department of Commerce launches the Kansas Certified Sites

Program based on the program created

by the Evergy Economic Development Team.

Size Up Online Platform: SizeUp is big data for small businesses that Size gives business intelligence and market research to companies so they can make smarter decisions through data. Use this tool

to analyze competitive benchmarks, find customers,

suppliers, competitors and where to target

AEDO Recertification – originally accredited in 2016, Evergy is one of two utilities to achieve AEDO status in the nation.



LocationOne Information System (LOIS)

is Now Available to All Kansas Communities through the Kansas **Department of Commerce**



Helped pass the new state of Kansas EDR - Special Electric Rate for Economic Development (SEED) Bill - in partnership with the Government Affairs team.

LOCAL PARTNER RESULTS: USING EVERGY RESOURCES TO WIN PROJECTS

Chewy Fetches Fulfillment Center in Belton, MO

your message.

Chewy, Inc. an online retailer of pet supplies will build a 796,000 square-foot fulfillment center with the ability to add up to 215,000 additional square-feet at the Southview Commerce Center in Belton.

Chewy's \$143 million capital investment at NorthPoint Development's 148-acre industrial site along Interstate 49, will yield 800 new jobs the first year of operation and will grow to 1,600 jobs by 2023. The new facility is the only one located in Missouri.

The Evergy Economic Development team supported this project through the Economic Development Rider (EDR) and Energy Efficiency programs.

To prepare the community for a project like Chewy, The City of Belton's Economic Development Team regularly utilized a variety of Local Partner Programs, including:

- · Site Preparedness Studies Phases 1 and 2
- · Marketing Tool Box
- OU EDI Scholarship
- MO Partnership Community Assessment
- · Economic Development Strategic Plan

LOCAL PARTNER RESULTS: PARTNERSHIPS AND NEW KANSAS EDR

Dot's Pretzels, LLC selects Logistics Park Kansas City in Edgerton for its new manufacturing facility.

The premiere pretzel brand in North America plans to begin operations later this year in the new facility that will increase Dot's production capacity to meet the ever-increasing national demand for their snacks. Yum!

The company purchased a 186,107 square-foot building at LPKC and is investing \$15 million. Dot's will create 22 new jobs.

- · Partnership between developer and the City of Edgerton
- Cost-savings Economic Development Rider Tariff

LOCAL PARTNER RESULTS: EDR AND RENEWABLES DIRECT PROGRAM

Schwan's Takes a Bigger Slice in Salina, KS

Schwan's Company, the producer of Tony's® and Red Baron® pizza for grocery stores and schools nationwide, announced plans to build a new 400,000 expansion to its existing 550,000 square-foot production facility and distribution center.

A strong relationship with local Schwan's leadership at the current facility coupled with a strong economic development offering was a key component to this win. The EDR and the Renewables Direct Program was a game changer because it helps the company with their environmental improvement efforts.



2021 SCORE CARD



- \$1,199,159,060
 in NEW Capital Investment from
 19 PROJECTS ranging from Logistics to Manufacturing to Data Centers.
- ✓ 2,296 new jobs QQQQQ
- **√** 53,682 KW in New Demand Growth



Site Selection Magazine Names
Evergy a Top U.S. Utility in
Economic Development.





OUR MISSION 🔀

As a leading and trusted energy partner, the mission of the Economic Development team is to attract new companies, retain and expand existing customers while making strategic partner investments that result in the creation of new load growth. We strive to increase shareholder value and improve the quality of life in the communities we serve.

▼ TARGETED INDUSTRIES OUTREACH











to promote announcements and programs



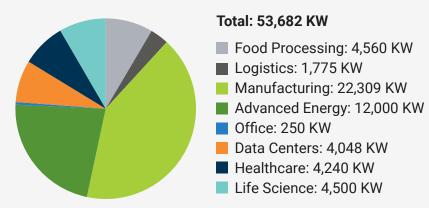
LOCAL PARTNER PROGRAM INVESTMENTS







✓ DEMAND BY INDUSTRY TYPE



✓ PROJECT WINS

Logistics: 1

Manufacturing: 9

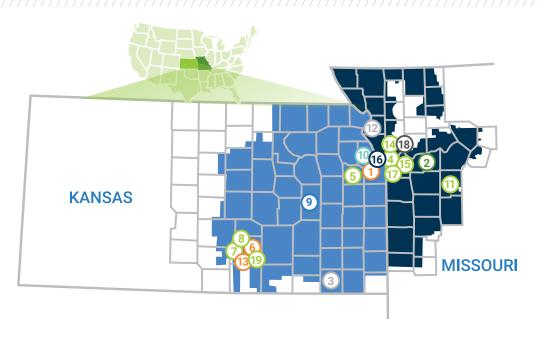
Data Center: 3

Office: 1

Food Processing: 2

Advanced Energy: 1

Healthcare: 1
Life Science: 1



Netrality / Shawnee, KS
NEW JOBS: 7 / INVESTMENT: \$22,750,000

Enbridge Pipeline / Concordia, MO

NEW JOBS: 3 / INVESTMENT: \$55,000,000

Niagara Bottling / Kansas City, MO
NEW JOBS: 100 / INVESTMENT: \$200,000,000

Berry Global / Lawrence, KS

- Airxcel / Wichita, KS
 NEW JOBS: 160 / INVESTMENT: \$12,500,000
- NEW JUBS: 100 / INVESTMENT: \$12,500,000

Brek Manufacturing Co./Wichita, KS

- NEW JOBS: 99 / INVESTMENT: \$61,000,000 NEW JOBS: 65 / INVESTMENT: \$5,514,560
- Bartlett Grain Company/Charryvale, KS 6 Millennium Corp./K-54/Wichita, KS NEW JOBS: 50/INVESTMENT: \$322,750,000 NEW JOBS: 15/INVESTMENT: \$740,000
- Communications Solutions, LLC
 Emporia, KS / NEW JOBS: 250

- Hills Pet Nutrition / Tonganoxie, KS NEW JOBS: 31 / INVESTMENT: \$250,000,000
- Prysmian Group / Sedalia, MO
 NEW JOBS: 31 / INVESTMENT: \$3,500,000
- Cereal Ingredients / St. Joseph, MO
 NEW JOBS: 60 / INVESTMENT: \$25,104,500
- Novacoast, Inc. / Wichita, KS NEW JOBS: 62 / INVESTMENT: \$1,250,000
- Walgreens / Liberty, MO
 NEW JOBS: 200 / INVESTMENT: \$12,500,000
- 15 Honeywell Federal Mfg. & Tech./Kansas City, MO NEW JOBS: 100 / INVESTMENT: \$63,500,000
- Medline, Inc. / Bonner Springs, KS
 NEW JOBS: 141 / INVESTMENT: \$75,000,000
- Alpla, Inc. / Kansas City, MO NEW JOBS: 75 / INVESTMENT: \$24,000,000
- Hallmark Cards / Liberty, MO
 NEW JOBS: 398 / INVESTMENT: \$22,300,000
- (19) Kansas Mod Center / Wichita, KS NEW JOBS: 400INVESTMENT: \$23,400,060

Attachment 6
Page 59 of 63

Evergy Food and Beverage Industry Attraction: Sustainability

Did you know that Evergy is creating a lower carbon future for food and beverage companies?



Increasing generation of renewables by **more than 1,250%** in the past decade



One of the *top renewable energy provider* in the region



Working to **Reduce CO₂ emissions by 85%** by 2030



Nearly **\$1.8 Billion** invested in **environmental improvements**



We now produce **50%** of our customers' power annually from **renewable sources**

Economic Development Organizations and communities can benefit from using Evergy's SizeUp's platform, a business intelligence tool.

SizeUp invented the online strategy, process, and technology to help small businesses make smarter decisions based on data.



Use this tool to analyze competitive benchmarks, find customers, suppliers, competitors and where to target your message.

Building a Sustainable Future

Evergy's Sustainability Transformation Plan (STP) is focused on these areas:

- 1. Grid Modernization
- 2. Cost Efficiencies
- 3. Customer Experience
- 4. Generation Transition

Other key themes:

- Reliability We're listening, learning and taking action
- · Investing in strengthening the grid
- Continuing to balance the different types of power plants we use to make your power, so we're not overly dependent on any one source of fuel
- Evaluating our digital customer service options to develop better ways to stay connected with our customers

LOIS: Seamless Integration to Lasso

LOIS and Global Location Strategies have partnered to develop a data collection tool called Lasso.



Lasso standardizes property data collection and accelerates the data assembly process to help efficiently distribute RFIs to its stakeholders. This is the first of its kind property data collection application that fully automates the data collection process.





AEDO 2021 Recertification

Originally accredited in 2016, Evergy is one of two utilities to achieve AEDO status in the nation.

LOCAL PARTNER RESULTS: USING EVERGY RESOURCES TO WIN PROJECTS

Specialty Ingredients Manufacturer Adds Location in St. Joseph.

Cereal Ingredients, Inc. announced the investment



of \$24 million for the construction and equipment of a 85,860 squarefoot manufacturing facility in the Eastowne Business Park in St. Joseph, Mo. Anticipated to be complete in the first quarter of 2022, the company will eventually employ 60 at the new facility.

Cereal Ingredients has qualified for the Evergy Missouri Standard EDR providing a reduced rate for five years.

St. Joseph Economic Development Partnership has utilized several Local Partner Programs to help build capacity to increase economic development success.

- Future Land Development Study
- Drone Video
- 2018 Strategic Plan
- Place Making Study
- LOIS Real Estate Data Verification Project

LOCAL PARTNER RESULTS: UNPRECEDENTED CAPITAL INVESTMENT PLANNED IN LEAVENWORTH COUNTY, KANSAS

Hill's Pet Nutrition will build a 300,000-square-foot manufacturing facility in the Tonganoxie Business Park.

Hill's expects to create 80 high-wage jobs at its new \$325 million facility. This capital investment is unprecedented for a manufacturer in Leavenworth County.

Leavenworth County Development Corporation (LCDC) utilized the following Evergy Local Partner Programs to promote economic development:

- Marketing, Branding and Website Development
- Drone Videos
- · Workforce Study
- Virtual Site Tours



De Soto, Kansas Conducts Due Diligence Study on Large Tract

Evergy Economic Development facilitated the connection with



Burns & McDonnell and the De Soto Economic Development Council to conduct a Due Diligence Study for a 319-acre tract of land known as the Gabriel Property. The site is privately owned and located on K-10 with access to two interchanges. The Study outlines details of environmental and utility factors for the site.

The Study has been able to answer nearly every question potential developers have including zoning, setback restrictions, local roadway infrastructure, offsite improvements, rail access commercial air service, topography, suitable soils and emergency services.

In addition to this site study, De Soto has utilized these Evergy Economic Development Local Partner Programs:

- Due Diligence and Master Plan for the Gabriel Site
- Economic Development Facilitation Training
- Community Housing Assessment
- Downtown Revitalization
- Branding

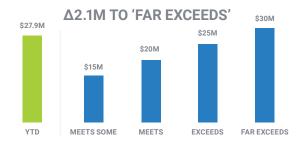
Evergy Economic Devleopment Team: (LtoR) John Engelmann, Joe Fangman, Ebony Clemons-Ajibolade and Lisa Franklin



2019 SCORE CARD

✓ 87 NEVV PROJECTS

■ \$27,930,698 ECONOMIC IMPACT



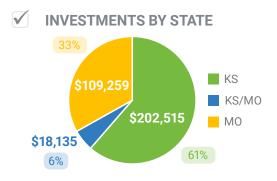
✓ 3,496

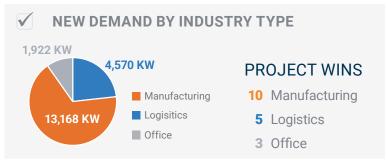
NEW CAPITAL INVESTMENT

of Local Partners Surveyed Rate the Economic Development Team's Performance as **EXCELLENT**

LAUNCHED AND REBRANDED evergyED.com WEBSITE







"Without the assistance and guidance from Evergy through the Local Partner Program, our community would not have been able to develop both an Economic Development and Master Plan. These plans are a key component to advancing continued economic development success for the City of Belton."

- Carolyn Yatsook, Economic Development Director

ECONOMIC DEVELOPMENT IS A TEAM SPORT

Shout out to our internal Evergy friends and colleagues who made 2019 a success. Thank you!

- Distribution and Transmission Planning
- Transmission and Substation Engineering
- ▶ Business Center
- ► Regulatory
- ▶ Central Design
- Customer Service Managers
- ► Energy Efficiency





SCHEDULE CAC-4 CONTAINS CONFIDENTIAL INFORMATION NOT AVAILABLE TO THE PUBLIC.

ORIGINALS FILED UNDER SEAL.

Exhibit No.:

Issue: Rate design studies and rate case

commitments, Rate Modernization Plan, Benefits of Advanced Metering

Infrastructure, Transportation Electrification, Emergency Energy Conservation Plan, Lighting, Solar

Subscription

Witness: Bradley D. Lutz Type of Exhibit: Direct Testimony Sponsoring Party: Evergy Missouri Metro Case No.: ER-2022-0129

Date Testimony Prepared: January 7, 2022

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2022-0129

DIRECT TESTIMONY

OF

BRADLEY D. LUTZ

ON BEHALF OF

EVERGY MISSOURI METRO

Kansas City, Missouri January 2022

TABLE OF CONTENTS

I. RATE DESIGN STUDIES & RATE CASE COMMITMENTS UPDATE	3
II. RATE MODERNIZATION PLAN	19
III. BENEFITS OF ADVANCED METERING INFRASTRUCTURE	35
IV. TRANSPORTATION ELECTRIFICATION	42
V. EMERGENCY ENERGY CONSERVATION PLAN	49
VI. LIGHTING	51
VII SOLAR SURSCRIPTION	52

DIRECT TESTIMONY

OF

BRADLEY D. LUTZ

Case No. ER-2022-0129

1	Q:	Please state your name and business address.		
2	A:	My name is Bradley D. Lutz. My business address is 1200 Main, Kansas City, Missouri		
3		64105.		
4	Q:	By whom and in what capacity are you employed?		
5	A:	I am employed by Evergy Metro, Inc. I serve as Director, Regulatory Affairs for Evergy		
6		Metro, Inc. d/b/a as Evergy Missouri Metro ("Evergy Missouri Metro"), Evergy Missouri		
7		West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West"), Evergy Metro, Inc. d/b/a		
8		Evergy Kansas Metro ("Evergy Kansas Metro"), and Evergy Kansas Central, Inc. and		
9		Evergy South, Inc., collectively d/b/a as Evergy Kansas Central ("Evergy Kansas Central")		
10		the operating utilities of Evergy, Inc.		
11	Q:	On whose behalf are you testifying?		
12	A :	I am testifying on behalf of Evergy Missouri Metro.		
13	Q:	What are your responsibilities?		
14	A:	My current responsibilities are focused on rates, regulatory operations and customer issues,		
15		providing support and oversight for a wide range of regulatory work including		
16		determination of retail revenues, load analysis, rate design, class cost of service, tariff		
17		administration, compliance reporting, response to customer complaints, docket		
18		management system administration, general tariff administration, and relationship		

1		development for the Company's regulatory activities in the Missouri and Kansas
2		jurisdictions.
3	Q:	Please describe your education, experience and employment history.
4	A:	I hold a Master of Business Administration from Northwest Missouri State University and
5		a Bachelor of Science degree in Engineering Technology from Missouri Western State
6		University.
7		I joined Evergy, then Kansas City Power & Light, in August 2002 as an Auditor in
8		the Audit Services Department. I moved to the Company's Regulatory Affairs group in
9		September 2005 as a Regulatory Analyst where my primary responsibilities included
10		support of our rate design and class cost of service efforts. I was promoted to Manager in
11		November 2010 and was promoted to my current position in March 2020.
12		Prior to joining Evergy, I was employed by the St. Joseph Frontier Casino for two
13		years as Information Technology Manager. Prior to St. Joseph Frontier Casino, I was
14		employed by St. Joseph Light and Power Company for nearly 14 years. I held various
15		technical positions at St. Joseph Light and Power Company, including Engineering
16		Technician-Distribution, Automated Mapping/Facilities Management Coordinator, and
17		my final position as Senior Client Support Specialist-Information Technology.
18	Q:	Have you previously testified in a proceeding before the Missouri Public Service
19		Commission ("Commission" or "MPSC") or before any other utility regulatory
20		agency?
21	A:	Yes, I have testified multiple times before the Commission concerning tariff, class cost of
22		service and rate design topics as part of various recent proceedings. Additionally, I have
23		testified multiple times before the Kansas Corporation Commission.

1	Q:	What is the purpose of your testimony?	
2	A:	I will address the following topics in my testimony:	
3		I. Rate Design Studies and Rate Case Commitments	
4		II. Rate Modernization Plan	
5		III. Benefits of Advanced Metering Infrastructure	
6		IV. Transportation Electrification	
7		V. Emergency Energy Conservation Plan	
8		VI. Lighting	
9		VII. Solar Subscription	
10		I. RATE DESIGN STUDIES & RATE CASE COMMITMENTS UPDATE	
11	Q:	Rate Design Studies were ordered in the 2018 Evergy Missouri Metro rate case. Can	
12		you explain what was ordered?	
13	A:	Yes. In the Company's last rate case ("ER-2018-0145"), there were several rate design	
14		studies and commitments made over four Stipulation & Agreements ("S&A's"). A full	
15		listing can be found in Table 1-Rate Case Commitments below. In the S&A filed on	
16		September 19, 2018 (pgs. 9-10), it included the following:	
17		"16. CONSOLIDATION STUDY	
18		The Company will perform a study investigating the consolidation of KCP&L and	
19		GMO rates and will make a recommendation regarding consolidation of rates in	
20		these dockets within two years of the date of approval of this Stipulation. KCP&L	
21		and GMO will provide quarterly stakeholder updates concerning the study.	

1		17.	CUSTOMER BILLS
2			The Company will work with stakeholders regarding customer bill presentation.
3			The Company will meet to obtain stakeholder input no later than six months after
4			the effective date of the tariff sheets approved by the Commission in these cases.
5			The Company expects the new bill presentation to occur within 24 months from
6			effective date of rates in these cases.
7			The Company commits to include a description of FAC, RESRAM, and DSIM in
8			bills to customers at least annually. The Company shall send draft language to
9			Staff, OPC, and DE prior to sending to its customers.
10		18.	CUSTOMER PRIVACY
11			The Company will adopt the Green Button platform no later than the second half
12			of 2020.
13			The Company commits to producing a privacy policy statement and frequently
14			asked questions ("FAQ") website section for customers regarding use of customer
15			data. The Company will receive input from OPC, Staff, and DE on the privacy
16			policy statement and FAQs. The Company will hold annual meetings with Staff,
17			OPC, and DE regarding the results of third party privacy impact assessments. The
18			meetings and any material discussed at the meetings may be designated as
19			confidential by the Company."
20	Q:	What	t is the status of these three studies or commitments?
21	A:	All of	f the commitments have been met and completed.

1. Consolidation Study

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

In compliance with the Commission Order, the study was completed and filed on October 30, 2020, in File Nos. ER-2018-0145/0146 and explored topics and details that would be necessary for various levels of rate consolidation. The study focused on the combination of the Evergy Missouri Metro and Evergy Missouri West jurisdiction's rates and costs for rate making purposes. To better ensure success given the interrelated or shared nature of some costs between Evergy Missouri Metro and Evergy Kansas Metro, we explain important considerations as we explore the feasibility and ease of consolidation of rates between Evergy Missouri Metro and Evergy Missouri West. To the extent possible, the Company utilized learnings from past consolidations, including the 2012 Westar rate consolidation and the 2016 Greater Missouri Operations Company ("GMO") rate consolidation, as well as leveraged data and information gathered as part of their 2018 rate case in order to maximize efficiency and allow for utilization of in-house personnel, as preferred by the Commission and parties of this study. The objective of the study was to outline the current state of operations, costs, and rates, as well as the potential obstacles with immediate rate consolidation given the current state, and finally, the steps recommended to consolidate rates properly (leveraging past learnings) with a possible execution timeline. The timing and pace for consolidation was determined based on customer impact. Much of the plan outlined in that Consolidation study has been put in motion in this rate case, starting with the elimination of grandfathered rates, rate clean up, and cross jurisdictional alignment.

For the results of the study and how those learnings informed this rate case filing, see the Direct testimony of Company witness, Marisol Miller.

2. Customer Bills

The Company completed a bill redesign shortly after the completion of the merger forming Evergy. During the rebranding that followed the merger, the Company shared plans with Staff and OPC on June 5, 2019, addressing concerns parties had raised about having better clarity on the bill for a customer's rate jurisdiction. This commitment is complete.

Concerning the description of FAC, RESRAM, and DSIM in bills to customers, the Company worked jointly with Staff and OPC in late 2020 to establish the description document, a bill insert suitable for ongoing communications to customers. Going forward the insert is scheduled to be sent to customers each March with a draft shared prior to distribution. This commitment is complete and ongoing.

3. <u>Customer Privacy</u>

The Company held multiple meetings with of Staff, OPC, and the Division of Energy to discuss this commitment in late 2019 and early 2020. Each of the components of the commitment (Green Button data access, Privacy Policy, and Privacy Impact Assessments) was addressed in the meetings. This commitment is complete and ongoing.

Concerning Green Button, the deployment of this standard has required considerable planning, particularly since the deployment would include integration with protected Company data systems and account portal applications managed in part by third-party vendors. Given the structure of the account portal applications, the Green Button deployment took two paths, one for residential and smaller commercial & industrial

customers and one for large commercial & industrial customers. Access to data through the Green Button standard was enabled in Fall 2020 for residential and smaller commercial & industrial customers, accounting for approximately 96% of Evergy customers. Green Button access for large commercial & industrial customers, approximately 4% of customers, is pending. Deployment for large commercial & industrial customers will be completed as part of the Company's deployment of new account portal software. This new software will allow more account control, data access, and general functionality for all customers. As this new software environment is deployed, Green Button functionality will be included. Under the current plans the new software will be deployed for residential and smaller commercial & industrial customers deployed later. During the interim, large commercial & industrial customers have the ability to directly download billing data or may request more detailed metering data from Company Customer Support representatives assigned to them. This commitment is ongoing.

Concerning the Privacy Policy, the Company shared the existing privacy policy and edits were discussed. This included revisions to the privacy policy frequently asked questions. After several iterations, a new privacy policy was posted to the Company website and made effective in April 2020. This commitment is complete.

Concerning the Privacy Impact Assessment, the Company has conducted an annual third-party privacy assessment and scheduled meetings to discuss its results with Staff, OPC and Division of Energy each December of 2019 2020, and 2021. This commitment is ongoing.

1	Q:	Were there any rate design studies or rate or customer related commitments included
2		in the S&A dated September 21, 2018?
3	A:	No.
4	Q:	Were there any rate design studies or rate or customer related commitments included
5		in the S&A dated September 25, 2018?
6	A:	Yes. The S&A(pg.7) included the following language:
7		"i. By June 30, 2020, KCP&L will file a rate design case limited to TOU issues.
8		For GMO, signatories further agree the September 20, 2016 Non-Unanimous
9		Stipulation and Agreement in ER-2016-0156 will be expanded to include TOU , with
10		the TOU rate design case to commence by June 30, 2020.
11		j. KCP&L and GMO will submit a Residential TOU rate design in their next rate
12		cases based on lessons learned from the TOU service."
13		Pgs. 11-19 outlined the following:
14		"6. REAL TIME PRICING & TWO PART TIME OF USE
15		b. The Company will work with interested parties to develop RTP or similar tariff
16		that is compatible with billing system by its next rate case.
17		8. <u>LINE EXTENSION TARIFF-EV MAKE READY</u>
18		a. The Company agrees to establish and offer a standard construction allowance
19		within the line extension process for EV "make ready" facilities.
20		9. <u>OTHER RATE DESIGN-RELATED STUDIES</u>
21		a. The Company agrees to study alignment of billing seasons between KCP&L and
22		GMO utilities.

1		b. The Company agrees to work with Staff to define and retain billing determinants
2		for future rate designs.
3		c. The Company agrees to work with Staff to define data to support evaluation of
4		the seasonal nature of demands on the transmission and distribution systems or the
5		seasonal nature of the costs of capacity and energy to serve load.
6		16. <u>LOAD RESEARCH</u>
7		a. For a future GMO rate case, the load research will reflect the new sample to
8		reflect GMO consolidation."
9	Q:	What is the status of these commitments?
10	A.	1., 2., & 3. TOU Rate Design Case & GMO C&I Rate Design Case
11		This rate case commitment is complete. Because TOU was only just offered on
12		October 2019, the original timing for the TOU rate design case (June 30, 2020) would not
13		have allowed for a full 12-month data set, inclusive of summer months in the TOU rate
14		design case filing. As a result, the Company requested an extension to allow for
15		meaningful review. After being granted extensions by the Commission, the TOU Rate
16		Design Cases were filed on June 15, 2021, in File Nos. EO-2021-0349/0350.
17		The S&A also included a provision referencing a 2016 rate case (S&A dated
18		September 20, 2016) commitment which required a GMO (now Evergy Missouri West)
19		C&I Rate design case. Both the TOU rate design case (2018 rate case) and the GMO C&I
20		rate design case filings (2016 rate case) were bundled together in the 2018 S&A in an effort
21		to streamline filings for MO West. The 2018 S&A language anticipated that when the
22		2016 GMO C&I rate design case filing was filed on June 30, 2019, it would be concluded

by June 30, 2020, to allow for the TOU rate design case filing to begin. However, the

23

Company filed for an extension of the 2016 GMO C&I rate design case on May 22, 2019, to file the rate design case by June 30, 2020. Once the timing for the TOU Rate Design Case and the GMO C&I Rate Design Case became largely separate, the Company addressed each separately and in separate filings.

The GMO C&I Rate Design Case was filed on June 30, 2020, in File No. EO-2020-0422. The original S&A language included the following,

"If GMO does not file a rate case including at least 12 months of resampled consolidated rate billing data by June 30, 2019, it shall file a rate design case by June 30, 2019 that includes 12 months consolidated rate billing data using the April 30, 2018 resample of load research as the basis of GMO's direct filing."

The filing included analysis that used 12 months of resampled consolidated billing data required by the S&A. It relied on resampled load research and followed many of the steps expected in a typical rate case including, establishment of a test year, weather normalization, customer growth, and other adjustments, as well as cost analysis. It leveraged many of the learnings of the GMO consolidation collaborative meetings and analysis similar to what was reviewed in those meetings, including revenue analysis by class and \$/kwh by class. The analysis contained in the Rate Design Case confirmed the appropriateness of the consolidation of GMO C&I rates made in the 2016 rate case.

Lastly, the TOU rate proposals being made in this rate case were designed based on learnings from the TOU offering that started in October of 2019. The Company took the learnings from that experience, customer feedback, and implementation success to develop a revised 3-period TOU rate, as well as a new 2-period TOU rate. These new rate

offerings will be further discussed later in my testimony, as well as the testimony of Company witness Kimberly H. Winslow.

4. Real Time Pricing ("RTP") alternative

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

This rate case commitment is complete. The Company believes this to be an important element in its overall Rate Plan. As such, the Company consulted with existing RTP customers and other C&I customers to understand how customers manage energy within their respective processes. It became clear that none of our customers adjust their operations specifically due to energy pricing. There might be some consideration of pricing when planning maintenance or other shutdowns, but other drivers dictate operation behavior. In general, customers are using the RTP rate only because of overall bill amount, not the real-time element of the rate. Evergy used this information to develop a rate that captured time-based elements in a way that could reflect a degree of the real time pricing and will work with the billing system and avoid manual billing. The rate development also sought to introduce a higher level of predictability to the rate to limit negative impacts from market volatility and subsequent negative impact to customer operations. The new Time-Related Pricing rate is being offered in this rate case. The Company proposes to implement the Time-Related Pricing rate in a limited fashion, restricting the number of participants, giving the Company the opportunity to verify the performance of the new rate. For more details on the rate design of this new rate, please see the Direct testimony of Company witness Marisol E. Miller.

5. <u>Line Extension Tariff</u>

This rate case commitment is complete. Evergy established a standard construction allowance within the line extension process for EV "make ready" facilities. The standard

construction allowance for line extensions to separately metered commercial EV charging stations was set at \$4,500 per port for Level 2 charging stations and the greater of \$27,000 per site or \$4,500 per port for Fast Direct Current chargers. These allowances are applicable to the Evergy Missouri Metro and Evergy Missouri West jurisdictions. These details have been communicated to Evergy Field Design and Engineering personnel as these are the groups most likely to interact with customers installing these facilities and applying these allowances to the revenue justification step of the Evergy Line Extension Policy.

6. Other Rate Design Related Studies-

These commitments and studies have all been met and/or completed. These commitments included a study of the alignment of seasons for Evergy Missouri Metro and Evergy Missouri West, as well as agreements to work with Staff to define data for future rate designs and to support the evaluation of the seasonal nature of costs.

a. Seasonal Study

A study evaluating the potential alignment of Evergy Missouri Metro and Evergy Missouri West is filed as part of this rate case. Please see Schedule BDL-1 for the full study. The study explored seasonal rate periods of other utilities, as well as included the analysis of system peak loads to determine the typical and ideal seasons, as well as analysis of bill and revenue impacts to understand the total impact of the seasonal change. To determine the customer impacts of the change, actual billing determinants for each customer was pulled from billing system and customer bills were recalculated using the newly defined seasons. Then, comparisons of the total annual bill using the old season

and new season was performed to determine the change in billing. 99.9% of customers saw their bills impacted by less than 5% and almost two thirds of those customers seeing an impact of 0% to -5% on an annual basis. Overall, the study showed benefit to alignment of the dates for the summer and winter seasons. So, with the goal of simplification and alignment and in support of progress in rate modernization, the Company is proposing alignment of the dates for the summer and winter seasons, specifically, the change of the Evergy Missouri Metro jurisdiction to have the same summer season definition and start date of June 1- September 30 and winter for all remaining months, as its Evergy Missouri West jurisdiction. For the specific tariff changes resulting from that study and test year revenue impacts, please see the Direct testimony of Company witness, Marisol E. Miller.

b. Data

The Company had several discussions with Staff on this commitment. The first discussion was in the TOU stakeholder meeting held in December 2018 when Staff expressed interest in early discussion around this commitment. Staff followed up with an email including examples of the kind of data they might be looking for with the admission that they were not aware of what was possible. Follow up emails from Staff indicated that the initial request had been revised and "simplified" to include the retention of three years of every individual customer's 15-minute interval data configured to be further aggregated with extensive billing characteristics/needs previously communicated. The request was not just to retain, but to provide data for external use by Staff.

The Company researched the request with the technical experts in the Company to determine feasibility. While the data is already contained and housed as part of the Company's MDM and Billing systems, the process for extraction of this data for external use in the detail requested by Staff with the billing characteristics requested, required extensive reconfiguration of existing Company processes-which are set up primarily to allow for billing and intrasystem communication and jobs.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

Over three meetings held with Staff held on April 10, 2019; February 7, 2020; and June 4, 2020, the Company communicated challenges and obstacles to Staff's request. For example, using just a test extract (sample) of the data needed, it would take approximately 69 days, running on 10 different machines and would result in a 20TB extract zipped to 846GB for transfer and assumed no other necessary tasks would be run. That represented just part of the initial request, not to mention the reconfiguration that would be needed to layer in other extraneous fields that Staff was interested in including, assuming that it was available in the Company's existing systems. The Company also posed a number of questions and concerns including questions around: how Staff would handle data storage, what were their processing capabilities/limits, how data could be shared-since providing a flat file would not be possible given the sheer volume of the data being requested and how its housed in the Company's systems. Additionally, given the desire for individual customer data by Staff, the Company inquired about governance and customer privacy. As a result of those meetings, MPSC Staff agreed that due to the extensive operational impact

of their request, aggregated hourly loads by class would work for their needs. As part of that agreement, the Company has used nearly 100% AMI data for weather normalization and aggregated hourly loads by rate class are available.

10. Load Research

This rate case commitment is complete. This commitment outlined the expectation that any future Evergy Missouri West rate case include a new load research sample reflective of the GMO consolidation of the C&I rate structures made in 2016. A presentation of the new Load Research Sample was provided in a meeting held with Staff on April 10, 2019. Additionally, as part of the GMO C&I Rate Design case filing, Staff provided response that utilization of AMI metered customer load information could serve as a reasonable replacement for load research. As such, the Company has utilized near one hundred percent sampling of AMI metered customers in this rate case rather than traditional load research and that was used for weather normalization. For more details on the transition from load research to AMI data utilization, please see Direct testimony of Company witness Marisol E. Miller.

Additionally, and given the significance of this transition, Evergy retained Itron to examine the processes used by Evergy and evaluate them relative to practices observed elsewhere in the industry. Itron is an external consultant and metering system vendor who has been providing metering-related products and services to the utility industry since 1977. Itron found that Evergy's AMI load aggregation process benchmarks well with methods developed by other utilities with AMI systems and Evergy is well-positioned to utilize aggregated AMI data for cost of service studies and rate case weather estimates and

1		is making progress toward leveraging AMI data for additional use cases in the future. The
2		full Itron report may be found in Schedule BDL-2 of this testimony.
3	Q.	Were there any rate design studies or rate or customer related commitments included
4		in the S&A dated September 27, 2018?
5	A:	Yes. The S&A (pg.3) included the following language:
6		"4. CUSTOMER EDUCATION REGARDING RATE DESIGN
7		a. The Company agrees to develop and implement a customer education plan
8		regarding the rate design presented in this Stipulation. In the development of the
9		education plan, the Company will examine and evaluate leading educational
10		processes and practices on customer education of rate designs. The Company's
11		rate design education plan may include various forms of tools, marketing and
12		customer education such as mailings, outbound calling, utilization of their
13		Interactive Voice Response Unit ("IVR"), text messaging, website information,
14		media outlets and outreach through various company partners including
15		community action agencies, senior housing centers and others.
16		b. The Company agrees to provide Staff, OPC, and DE with a report detailing its
17		planned rate design education program within the Q2 of 2019. The Company and
18		interested parties may further address the Company's rate design education
19		program within the stakeholder meetings identified in the Time Of Use ("TOU")
20		Non-Unanimous Stipulation and Agreement filed on September 25, 2018 in these

21

cases."

Q: What is the status of these commitments?

A. These rate case commitments have been completed. The Company examined and evaluated leading educational processes from peer utilities, leveraging customer feedback from our own customer research and that of other companies to develop a customer rate education plan for our base rates. This plan was emailed and presented to parties in the TOU stakeholder meeting held on June 28, 2019. No feedback was received regarding the plan.

Table 1-Rate Case Commitments

Non-Unanimous Partial S&A-dated September 19, 2018		
Commitment	<u>Status</u>	
1. Consolidated Study	1. COMPLETE - Filed on October 30, 2020 in Dockets ER-2018-0145 and ER-2018-0146.	
2. Customer Bills	2. COMPLETE – Bill redesign ONGOING – Annual review of Rider description.	
3. Customer Privacy	3. ONGOING – Green Button for Residential and Small/Medium Commercial Customers Deployed; Final deployment of Green Button for Large Customer scheduled. COMPLETE – New Privacy Policy ONGOING – Annual 3 rd Party Privacy Assessment	
Non-Unanimous S&A Regarding Pension and Other Post-Employment Benefits- dated September 21, 2018		
Commitment	<u>Status</u>	
1. None	1. N/A	

<u>N</u>	Non-Unanimous Partial S&A Concerning Rate Design-dated September 25, 2018		
	<u>Commitment</u>	<u>Status</u>	
1.	TOU Rate Design Case (KCPL-MO & GMO)	1. COMPLETE- TOU Rate Design Case filings made on June 15, 2021 in Dockets EO-2021-0349 and EO- 2021-0350.	
2.	2016 GMO C&I Rate Design Case	2. COMPLETE - Evergy Missouri West Rate Design Case filing made on June 30, 2020 in Docket EO- 2020-0422.	
3.	KCP&L and GMO Residential TOU rate design in their next rate cases based on lessons learned from the TOU service."	3. COMPLETE - Modified/New TOU rate designs were filed as part of the Rate Design Case filing made in #2 above, as well as in this 2022 rate case filing.	
4.	RTP or similar tariff that is compatible with billing system by its next rate case	4. COMPLETE - RTP replacement was proposed and filed in this 2022 rate case filing.	
5.	Line Extension Tariff-EV Make Ready	5. COMPLETE - Provisions added to Company Line Extension processes	
6.	Seasonal Study	6. COMPLETE - Seasonal study was performed and filed as part of this 2022 rate case filing.	
7.	Work with Staff to define data for future rate designs	7. COMPLETE - Aggregated hourly loads by class to be provided	
8.	Work with Staff to define data for evaluation seasonal nature of demands	8. COMPLETE -See #7 above.	
9.	Load Research	12. COMPLETE - Presented to Staff on April 10, 2019. In lieu of resampled load research, the Company has used AMI data to support weather normalization in this 2022 rate case filing.	
No	Non-Unanimous Partial S&A Regarding Class Revenue-dated September 27, 2018		
	<u>Commitment</u>	<u>Status</u>	
1.	Customer Education Regarding Base Rates	1.COMPLETE- The Customer Education Plan was emailed to parties' legal counsel and discussed as part of the TOU stakeholder presentation on June 28, 2019.	

2	Q:	Please describe your testimony concerning Evergy's Rate Modernization Plan.
3	A:	I am sponsoring a series of topics designed to complement the testimony of other Company
4		witnesses on the proposed efforts to update and expand our rate portfolio. Kimberly H.
5		Winslow provides a discussion on Evergy's overarching programs and rates to progress
6		towards greater customer choice to increase customer satisfaction, to enable customers to
7		better manage their bill and to educate customers how their behavior can minimize grid
8		impact. Charles A. Caisley provides testimony supporting how providing customers with
9		more choices in the way they receive and pay for their electric service is in the public
10		interest. My testimony, supported by the testimony and tariffs sponsored by Marisol E.
11		Miller, serves to detail how the rate designs are executed. Specifically, I will address,
12		• Enhancement and Expansion of the Company TOU Rate for customers
13		o Modification of the existing 3-period TOU rate
14		o Proposal of new, 2-period TOU rate
15		o TOU rates to appeal to Electric Vehicle drivers
16		 Proposal of a Residential High Differential TOU rate
17		 Proposal of Residential Separately Metered EV TOU Rate
18		 Proposal of Business EV Charging Service TOU Rate
19		Net Metering for TOU
20		Subscription Pilot pricing ratemaking treatment
21	Q:	Please describe Evergy's Rate Modernization Plan.
22	A:	The testimony of Kimberly H. Winslow provides a detailed review of the plan but in
23		summary, the Rate Modernization Plan ("Rate Plan") provides a framework for Evergy

II. RATE MODERNIZATION PLAN

1

1		that is both responsive to its historical regulatory obligations in Missouri and Kansas, but
2		also provides a framework for the Company's future general rate case filings. The Rate
3		Plan seeks to balance many objectives to increase overall customer satisfaction while
4		recovering revenue requirements. The Rate Plan will be executed over several rate cases
5		and will flex with changes in regulatory outcomes, industry developments and customer
6		desires.
7	Q:	What are the objectives of the Rate Plan?
8	A:	The objectives are:
9		• Creating rates that are independent of end use requirements
10		Bringing rate structures closer together across jurisdictions
11		Enabling business growth
12		Simplifying rates and increase pricing transparency
13		Providing greater customer choice
14		Increasing customer satisfaction
15		• Leveraging Customer Information System ("CIS") and Advanced Meter
16		Infrastructure ("AMI") investments
17		Developing price signals to increase grid efficiency
18	Q:	Please describe your testimony concerning the Residential TOU rates.
19	A:	Within my testimony I will describe Evergy's proposed enhancement and expansion of the
20		TOU rates in its rate portfolio. More specifically I will describe the guiding principles of
21		the proposal development, provide details of the analysis completed, and outline the
22		proposed rate designs. On June 15, 2021, in File Nos. EO-2021-0349/0350, Evergy filed

1 a Time of Use Rate Design Report. I will leverage that report to support this testimony 2 and provide it as an exhibit to my testimony as Schedule BDL-3. 3 Q: What enhancements and expansions are proposed? 4 Evergy is proposing the following with respect to its TOU rates: A: 5 For Residential customers: 6 Refine the existing 3-Period TOU rate - Although the majority of customers on the 7 existing TOU rate are satisfied with the rate and on average have seen an overall 8 decrease in their electric bills, the Company's analysis indicates that some 9 refinement in the rate design is warranted. Evergy is proposing to adjust the summer 10 and winter seasons to reflect a full, four-month period and to adjust the pricing 11 differentials for the non-summer TOU periods. The pricing differential change is 12 to better reflect the strong summer price observed by the Company's cost studies. 13 Add a 2-Period TOU rate – This is a new rate proposed that will provide customers 14 an additional TOU rate option that have less ability to shift usage throughout the 15 year and address the bill impact of the 3-Period TOU rate typically occurring for 16 space heating customers. The seasons and on-peak period definition will match the 17 3-period TOU rate. 18 Add a High Differential TOU rate designed to appeal to Electric Vehicle ("EV") 19 drivers – This 3-period rate will offer a high price differential between super off-20 peak (night) and on-peak time periods to better accommodate the charging patterns 21 of EV drivers. 22 Add a Separately Metered EV TOU Rate – This 3-period rate allows a customer to 23 use a TOU rate solely for the charging of their electric vehicle with the same pricing

1 structure as the High Differential TOU Rate but allows the customer's other home 2 usage to remain on a non-TOU rate. This is accomplished by requiring the 3 customer to have a separate meter for the EV usage. 4 For Commercial customers: 5 Business EV Charging Service – Originally proposed in the Company's 6 Transportation Electrification filing, this rate would provide electric service for the 7 exclusive use of charging electric vehicles by commercial customers. 8 Q: What steps did Evergy take in formulating these proposed rates? 9 A: To begin the Company considered the objectives mentioned earlier and then established a 10 number of strategic considerations to complement these objectives. These considerations 11 are more specific to TOU and intended to ensure the Company maintains focus on near 12 term factors and goals. The considerations are: 13 TOU remains an important part of Evergy's plans for today and in the future. 14 Customer experience is identified as one of the four key elements of the Evergy 15 Sustainability Transformation Plan. Giving customers a choice on their rate plan 16 has been identified as a factor in ensuring the customer experience remains positive. 17 It is appropriate to provide a broad selection of rates. Customers have expressed a 18 preference for choice in their rate plan and seek a balance of risk and reward 19 suitable for their situation. Customer relationships are critical in helping achieve 20 this alignment. A growing portion of customers seek to be more involved in their 21 energy experience. Others are seeking less involvement, instead seeking 22 predictability and control. By providing choice and meeting customers where they

are, we expect to receive a more meaningful and lasting effect from the offered rate designs.

- The TOU approach implemented by Evergy is working. In the Agreements achieved in the ER-2018-0145/0146 rate cases, the Company and parties worked together to define "a meaningful and successful process to establish alternative rate plans in the form of Time of Use ("TOU") rates for residential customers following accepted best practice and ensuring measured impact to customers within the class." The process was based on customer education and allowing customers to self-select, or opt-in to, the TOU rate. Evergy remains committed to the concept that a selected rate design approach by a utility is dependent on many factors and "one size does not fit all".
- Alignment of rate designs across Evergy is an appropriate goal. As Evergy brings together the various jurisdictions, having a common rate plan portfolio is a necessary goal. While Evergy will certainly look to do what is best for its customers and shareholders within its respective regulatory structures of the Missouri and Kansas jurisdictions, it recognizes that customers simply see Evergy as one company and our customers and shareholders will benefit from increasing consistency with all customer-facing elements of the Company's operations. This is a significant step and one that may take years to fully achieve.
- TOU rate designs present challenges and some issues cannot be resolved. At face
 value, TOU rate designs seem to be a good rate design for all customers. However,
 under closer examination it is evident that TOU rate designs are not well suited for
 customers with loads that cannot be shifted. Customers with continuously running

medical equipment or simply those with low levels of usage cannot shift usage to achieve the potential bill savings. Second, net metering presents a challenge. Issues with net metering and TOU are driven by statutory provisions that have not been updated to reflect dynamic rates. This issue is examined later in my testimony.

With this guidance in place, what was the next step in preparing the proposal?

Q:

A:

To begin, we considered the current TOU rates and how these rates were received from customers. This effort is detailed in Section 4 of Exhibit BDL-1 but in general included consideration of customer research providing qualitative and quantitative customer feedback on the TOU rate. The Company was also able to consider results from an interim¹ Evaluation, Measurement & Verification ("EM&V") report completed by Guidehouse, an external consultant. The EM&V provided valuable feedback on the performance of the TOU rate.

Next, the Company conducted research and benchmarking on TOU deployments across the electric utility industry. With the assistance of Brattle, an external consultant, the research analyzed dozens of TOU programs worldwide, examining the design features and when possible the results of each. Evergy also relied on internal studies and work performed to understand TOU and rate design trends. These efforts provided valuable insights around what works and does not work with respect to TOU rate design.

Lastly, Evergy, with continued support from Brattle, performed data analysis to provide inputs to the design. Analysis completed included TOU Season Analysis, TOU Time Period Analysis, and TOU Price Differential Analysis. This work was detailed and voluminous. Please see Section 5 of Schedule BDL-3 for those details.

¹ A final version of the TOU Evaluation, Measurement & Verification report was filed in the ER-2018-0145/0146 cases on December 29, 2021.

Q: Would you please summarize the results of that data analysis?

Yes. For the Season Analysis, Evergy examined annual daily peak, average, and minimum loads for each Missouri jurisdiction. This revealed that Evergy and each jurisdiction individually, exhibit the highest daily peak load in in the four months of June, July, August, and September. Further, looking at the individual hours shows that all hours in which the system load exceeds 75% of the annual system peak hour occur during the months of June through September.² Evergy also examined the SPP day-ahead average daily price³ and the cooling degree days⁴ for the past 10 years⁵. These data further support the summer season definition of June through September.

For the TOU Time Period Analysis, Evergy examined the system peak day and hour for the consolidated Evergy system and individual Missouri jurisdictions for each of the past five years. Although weather temperature dependent and varying throughout the months of July and August, the system annual Peak Hour consistently occurs from 4-5 pm in the late afternoon as increases in residential usage adds to the system load before the commercial and industrial loads begin to diminish. Evergy then examined the peak load hours where total system load exceeded 90% of the 2019 annual system peak and found that while each of the Missouri jurisdiction load profiles varies somewhat, they all show 100% of peak load hours occurring between noon and 9 pm with over 80% of the peak load

A:

² Section 5.4.1, pg. 39-43, Evergy Time of Use Rate (TOU) Rate Design Case Report, June 15, 2021

³ Id. Pg. 44

⁴ A degree day compares the mean (the average of the high and low) outdoor temperatures recorded for a location to a standard temperature, usually 65° Fahrenheit (F) in the United States. The more extreme the outside temperature, the higher the number of degree days. A high number of degree days generally results in higher levels of energy use for space heating or cooling. Cooling degree days (CDD) are a measure of how hot the temperature was on a given day or during a period of days. A day with a mean temperature of 80°F has 15 CDD. (https://www.eia.gov/energyexplained/units-and-calculators/degree-days.php)

⁵ Section 5.4.1, pg. 45, Evergy Time of Use Rate (TOU) Rate Design Case Report, June 15, 2021

⁶ Section 5.4.2.1, pg. 46, Evergy Time of Use Rate (TOU) Rate Design Case Report, June 15, 2021

hours occurring between 2 pm and 8 pm.⁷ Evergy further confirmed the appropriateness of this time period by:

- Examining the hour of the monthly system peak loads finding a majority of the monthly system peak loads occur between 3 pm and 7 pm, but a few non-summer months experience a monthly system peak during the 7-8 am hour.⁸
- Examining SPP day-ahead average daily pricing, noting again significant differences in the daily price profiles between the summer and non-summer seasons. The monthly average hourly day-ahead energy prices displayed clear time-based pricing patterns, showing a year-round low pricing period between midnight and 6 am, a summer season (June-Sept) high price period generally between 1 pm and 8 pm with the highest price hours occurring between 3 pm and 6 pm, and non-summer months prices are generally elevated in the morning and evening hours and are softer between noon and 5 pm. 9
- examining the residential class loads shows that the residential class has a fairly symmetrical load profile around a 4-hour summer peak load period between the hours of 4 pm and 8 pm and while there are some variations all Missouri jurisdictions exhibit the summer average monthly peak hours occurring between 5 pm and 7 pm and the highest residential class load hours generally occurring between 4 pm and 8 pm. 10

For the TOU Price Differential Analysis, Evergy analyzed the residential class cost components for generation, transmission, distribution, and energy. Driven by allocation,

⁷ Id. Pg. 47

⁸ Id. Pg. 48

⁹ Section 5.4.2.2, pg. 51-52, Evergy Time of Use Rate (TOU) Rate Design Case Report, June 15, 2021

¹⁰ Id. Section 5.4.2.3 pg 52-55

the costs were allocated to generation based on analysis of the system load duration curve relative to the periods, transmission costs based on the peak period for each month of the year, distribution costs were based on a split between periods, and energy costs based on the SPP energy prices in each period. This analysis show that for calculating the prices for a year-round 3-period TOU, results in a rate that has a strong summer peak price and a significantly discounted Super Off-Peak price, with modest price differences in the other periods. From a differential perspective, summer would be 6x On-Peak, 2x Off-Peak, and 1x Super Off-Peak and non-summer would be 3x On-Peak, 1.5x Off-Peak, and 1x Super Off-Peak. Looking at a 2-period approach, Evergy calculated summer would be 4x On-Peak and 1x Off-Peak and non-summer would be 2x On-Peak and 1x Off-Peak.

The analysis summarized in this testimony and detailed in the TOU Rate Design Report drove the proposed 3-period and 2-period rate designs and final pricing was based on data relevant to the test year of this case. Tariffs supporting the proposal are found on Sheet 7 and 7A for the 3-period TOU tariff and Sheet 7F and 7G for the 2-period TOU tariff of the Company filing sponsored by Marisol E. Miller's testimony. Details about the implementation of these proposed rates are provided for Kimberly H. Winslow's testimony.

- Q: Please describe your testimony concerning the proposed TOU rates designed for the EV driver.
- 20 A: Evergy identified the need for more specific EV TOU rates during its Transportation 21 Electrification ("TE") filing, File No. ET-2021-0151. It was enlightening that during the 22 evaluation of the existing 3-period TOU rate that while there was some increase in EV

¹¹ Section 5.4.3, pg. 59-62, Evergy Time of Use Rate (TOU) Rate Design Case Report, June 15, 2021

driver enrollment to the rate, there was not more participation from these customers. Company witness Kimberly H. Winslow covers this more fully in her testimony and our proposal to offer rates specifically targeted to EV drivers. My testimony details the design of the two proposed EV targeted rates, the 3-period High Differential TOU rate and Separately Metered EV TOU rate. Testimony concerning the Business EV Charging Service rate is addressed separately and later in this testimony.

How did Evergy design the proposed 3-period High Differential TOU Rate?

Q:

A:

To design the 3-period High Differential TOU rate, Evergy began by producing TOU period billing determinants based on the Residential class billing determinants. This was accomplished by examining the hourly loads for the Residential class and subtotaling them by TOU period. This allowed Evergy to produce an allocation applied to the Residential General Use billing determinates to approximate TOU billing determinants. With the TOU determinants, Evergy structured a model to iteratively seek an outcome balancing the TOU period differential goals and a revenue neutral relationship with the Residential General Use rate. The model builds off of a base rate set at slightly more than the approximate rate for the average SPP price for off-peak hours plus other SPP costs that are allocated by MWH during the test year. It is an approximate price because a key goal of the rate design was to target specific period differentials and the starting price was allowed to shift to achieve revenue neutrality within that goal. Care was taken to make sure this base rate remained close but higher than the average SPP price.

For development of the Separately Metered EV TOU tariff, the primary need was to establish an option that can be utilized in conjunction with an existing residential rate schedule for the whole-house but allow the EV driver to apply the high price differential TOU rate to EV charging only. Energy pricing for the Separately Metered EV TOU rate is identical to the pricing for the 3-period High Differential TOU rate, allowing for the customer to retain their existing residential rate for the home but install a meter to measure EV charging only usage. The Customer Charge reflects only the additional cost of the second meter at the premise. Priced at the difference between the Customer Charge of Residential General Use & Separate Meter Heating rate and the Residential General Use rate, the energy rate will be consistent for the Heating and EV applications; however with a different customer charge. Tariffs supporting the proposal are found on Sheet 7B and 7C for the 3-period High Differential TOU tariff and Sheet 7D and 7E for the Separately Metered EV TOU tariff of the Company filing sponsored by Marisol E. Miller's testimony.

Please describe your testimony concerning net metering for TOU.

12 A: Evergy has been closely examining the statutes and regulations associated with net
13 metering and has been attempting to devise an approach to accommodate net metering for
14 its TOU customers. My testimony will detail that effort and our resulting proposal.

Q: To provide a basis for your testimony, what is net metering?

Q:

A:

Net metering is a metering and billing arrangement designed to compensate distributed energy generation ("DG") system owners for any generation that is exported to the utility grid. Net metering allows utility customers with on-site DG to offset the electricity they draw from the grid throughout the billing cycle (e.g., one month). The utility customer pays for the net energy consumed from the utility grid.¹² Net metering is enabled by Section 386.890, RSMo Supp. 2008 and implemented by rule 20 CSR 4240-20.065.

¹² https://www.nrel.gov/state-local-tribal/basics-net-metering.html

Q: Why is net metering currently an issue for TOU customers?

A:

A:

Currently, TOU customers are not allowed to participate in net metering. Both the statute and the rule establish "billing period" as the time period for which the energy measurement and determination of net energy to occur. Billing period, as defined or inferred elsewhere in the statutes and rule or defined in our Company Rules & Regulations is a billing month, approximately 30 days. ¹³ In order to properly net usage for customers on a TOU rate, the measurement must occur for each of the TOU periods established by the applicable TOU rate schedule. This inhibits correct net metering and led Evergy to make net metering unavailable for customers choosing to be served under the TOU rates. Because of the current and growing prevalence of DG systems, this restriction has the potential to discourage adoption of the TOU rate designs.

Q: Has the Company explored ways that it might overcome this restriction?

Yes. Evergy consulted with its legal staff and internal subject matter experts to evaluate the current statutes and rules. The Company made inquiries to other utilities, vendors, and industry consultants to seek alternatives in other jurisdictions. Evergy also consulted with Ameren to understand their perspective on the issue. Ameren is similarly situated with their optional TOU rate deployment. In the end, only one approach proved to have any potential, proposing a separate tariff designed to mirror the existing net metering tariff, but inclusive of new language to address billing and measurement within the TOU structure. However, in the end, this approach also proved to be problematic.

¹³ From the Evergy Missouri West Rules & Regulations: "8.01 BILLING PERIOD: Normally, the Company will read the Customer's meter monthly and bills based on such monthly readings will be rendered at intervals of approximately one month. For all customers the billing period shall normally be not less than 26 nor more than 35 days. The Company shall have the right to read meters and render bills more frequently. If bills are rendered more frequently than monthly, the total of the minimums of such bills for any one month shall not exceed the monthly minimum required under the applicable rate schedule. For all customers if a bill is rendered for less than 26 or more than 35 days the bill may be prorated."

1 Q: Please explain the approach further and share what emerged as the problems.

A:

Relying on the Commission's general authority to approve tariffs, the approach consisted of duplicating the existing net metering tariff but replacing the Energy and Pricing section with language designed to accommodate the TOU structure. The net energy calculation would occur during the billing period for each of the time of use periods established by the applicable time-varying rate schedule applicable to the Customer-Generator's rate class in accordance with normal metering practices for customers taking service on time-varying rates in that same rate class. For excess energy, the Customer-Generator shall be credited an amount at least equal to the avoided fuel cost of the excess kilowatt-hours generated during that time of use period, with any net credit (net of all other charges as they are applied to non-customer-generators in the same rate class) applied to the following billing period. This approach would stand as an alternative to the existing net metering and since the existing net metering tariff was untouched, we believed we remained in compliance with the statute and rule.

Additionally, the approach seemed to work from a mathematical perspective but as we prepared a tariff draft, material concerns came to light. First, what would the alternative approach be called? If named "net metering" or some derivative, does that expose the tariff to legal challenge? Further, since the tariff approval is based on the Commission's general authority, there would be no constraint to the final structure of the alternate tariff. Other parties could introduce alternate approaches, prices, or terms that would distance the alternate approach from the original net metering design. At that point we could have two net metering style tariffs with very different designs. We then became very concerned about the potential for customer confusion.

1 Q: Why is the issue of potential customer confusion important?

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

A: Net metering, despite our many efforts to make it simple and straight-forward, is still a difficult step for most customers. Most customers historically gave little thought to their energy used except for the monthly bill amount. Those wishing to explore net metering are quickly exposed to new terms, new processes, and unfortunately, often conflicting information. It has been our experience that the net metering process has served to focus the customer experience and filter out much of the noise leading up to the execution of the respective DG system installation. Further, as the customer gets accustomed to the net metering processes in their billing, the net metering tariff and its application serves as a ready reference to address questions. As we contemplated a similar but separate process, particularly one that included some level of difference resulting from the regulatory process, we could see the potential for customer confusion. Customers on TOU rates would be subject to a different experience than those on the non-TOU rates. Our customer support and field personnel would now need to be aware of the customer rate before giving guidance. Additionally, if there were a legal challenge to the alternate approach that was ultimately found to be legitimate, we could be forced to move customers off the alternate rate.

Q: Did you explore questions about waivers or variances for the potential approach?

- 19 A: We did not. Given the Evergy decision not to propose the approach, we did not resolve20 our position on the need for waivers or variances.
- 21 Q: Ultimately, what is your recommendation concerning net metering for TOU?
- 22 A: Evergy believes that statutory changes are needed to properly address the change for net 23 metering customers. Evergy is willing to lead this effort within a future legislative session.

A change of this nature would be best addressed jointly with the Commission and the electric utilities. We understand the risk of opening the statute to unwelcomed changes, but Evergy believes having clear guidance from the legislature provides for a better rule and better tariffs. Tariffs that ultimately provide customers just and reasonable treatment with the greatest possible clarity. All of the other non-legislative approaches considered introduced some level of concern for some stakeholder group. Given we expect TOU rates to be a key part of our rate portfolio and customer DG to be an important part of our system, it is important that we establish the relationship between them in a correct and stable manner.

Q: Please describe your testimony concerning the Subscription Pricing Pilot.

A:

Evergy proposes offering a Subscription Pricing Pilot to its residential customers. This optional rate, implemented as a limited pilot, will provide customers with an entirely fixed monthly electricity bill. The Subscription Pricing offer includes a simple, no-risk financial incentive which rewards customers for limiting their energy use when enrolled in the rate. It also includes two optional add-ons, which are designed to encourage adoption of smart thermostats and the purchase of renewable energy credits. Evergy witness Ryan Hledik provides primary testimony detailing the design of the Subscription rate. Evergy Witness Kimberly H. Winslow provides testimony concerning the add-ons and the customer research completed to support the rate development. My testimony will further describe the treatment of revenues, riders and other costs of the subscription pricing offer relative to the standard rate.

1 Q: Please describe Evergy's proposed accounting treatment for revenues with the Subscription Pricing Pilot.

Evergy's proposal is to deploy the Subscription Pricing Pilot in a way that allows for the fixed bill but protects non-participants from the expected variability of the rate design and subsequent impact to their rates. To accomplish this, the Company is proposing to calculate the participant's monthly bill under the generally available residential rate and set that amount against the calculated fixed bill amount for that customer. The resulting difference, positive or negative, would be tracked below the line for regulatory accounting purposes. With this approach, revenues for customers opting into this program and considered in the next general rate case will be based on the generally available residential rate. This approach allows the Company to identify the actual costs for the customer in assessing the performance of the program but maintain the fixed monthly bill amount characteristic of this design. The approach also protects non-participating customer rates, ensuring they will not be impacted by profits or losses from this program.

Q: How will Riders be treated under this approach?

A:

A:

Riders, including the FAC, will be calculated and recorded in the books normally, based on actual usage and current rates. As noted in the testimony of Ryan Hledik, the monthly subscription amount is inclusive of the Riders, priced at the time of the subscription offer for a respective customer. Any differences between what is recorded on the books compared to the amount paid based on the subscription price would be accumulated as part of the below the line amounts. This would also capture differences from any change in base rates or riders during the timeframe of the subscription plan.

1 III. BENEFITS OF ADVANCED METERING INFRASTRUCTURE 2 Q: Please describe your testimony concerning Advanced Metering Infrastructure 3 ("AMI"). 4 A: Much discussion in past cases and other Commission interaction has revolved around the 5 Company's investment in AMI technologies, specifically, certain parties' assertions that 6 customers are not receiving full benefit for the AMI investment. My testimony details the 7 various benefits provided for the Company and the Customer. What is AMI? 8 Q: 9 A: AMI are digital meters that measure and record electricity usage data hourly, or more 10 frequently, and allow for two-way communication between electric companies and their customers. 14 11 12 Q: Please describe the timing of Missouri AMI deployment at Evergy. 13 Deployment began in January of 2014 in the Evergy Missouri Metro jurisdiction and was A: 14 completed in 2015. Deployment was started and completed in the urban areas of the 15 Evergy Missouri West service territory in 2016. In 2017 there was no implementation due 16 to implementation of a new Customer Care & Billing system. In 2018, Evergy began 17 installations in the rural areas of the Evergy Missouri West service territory and completed 18 deployment in early 2020. 19 What were the original drivers behind this AMI investment? Q: 20 A: The original need was driven by the need to replace the aging Cellnet, 1-way Automated 21 Meter Reading ("AMR") system, that was coming to the end of life in 2014. End of life 22 meant the Cellnet technology along with the meters on that system were no longer available

¹⁴ https://www.edisonfoundation.net/-/media/Files/IEI/publications/IEI_Smart-Meter-Report_2019_FINAL.ashx

1 for purchase. Hastened by the 2010 Department of Energy Grant Project, the Company 2 decided to go forward with AMI deployment. In building the business case supporting the investment, the Company identified 3 4 additional drivers or benefits to be gained from the conversion. Those drivers were: 5 Improvement in data reliability as compared to AMR system - With AMI, the 6 system can get directly to the meter and provide multiple sets of data per day such 7 as voltage information, temperature alarms and outage information. 8 More consistent meter reads - Two-way communication allows for meters to 9 communicate through other meters not only network devices, improving the ability 10 to receive a reading. 11 Remote disconnect capabilities – allow expedited connect/disconnect in small 12 commercial with self-contained metering and residential high move in/move out 13 areas reducing the costs associated with dispatching trucks and crews. 14 Improved outage management capabilities - communication from the meter 15 provides both increasing the accuracy and timeliness of receiving outages and 16 restoration events compared to waiting for customer notification. 17 Improved meter maintenance – active communication with the meter allows the 18 Company to become aware of issues with an AMI meter quickly. 19 Reassignment of labor – allow the Company to transition meter reading staff to 20 other service work. 21 Has Evergy been able to experience other benefits or improvements? Q: 22 A: Yes. The AMI system has been coupled with other technologies to unlock additional 23 capabilities and benefits for customers and the Company. Those include:

• Enhanced revenue protection – meter analytics combined with the ability to get meter events, and timely meter usage allow the Company to identify theft, meter failure, and voltage issues to name some examples.

- Load Analysis Evergy has transitioned away from statistical Load Research and is now utilizing AMI data aggregation for Load Analysis. In load research, daily and hourly rate class profiles are developed through designing and deploying customer samples, collecting, managing, and validating customer sample hourly load data, and applying statistical-based sample expansion methods. Under data aggregation the Company compiles the load information using data query and management techniques from the entire customer data set. Once in place and going forward, the data aggregation process is significantly less complex, requires less time to generate class load profiles, and is less costly than load research.
- Weather normalization Isolating weather allows the Company to see rate class sales trends and calculate the basis for test-year sales and revenue. Weather normalization models based on measured customer use will be more accurate than models based on statistical-based load estimates. Improved weather normalization also provides for improved variance analysis through more accurate tracking of the sales and revenue forecast.
- Forecasting AMI load aggregation provides a more accurate measure of current month sales use and as a result improved sales, revenue, and long-term energy demand forecasts. Models estimated directly from measured calendar month sales will have smaller variance and as a result an improved confidence interval around the forecast.

Outage communication – customer may enroll in an outage notification service that is enabled by AMI. The service allows Evergy to proactively tell customers that we are aware of their outage and give them restoration times, updates final confirmation that lights are back on, and the cause of the outage. These outbound notifications begin earlier in the process, and in a manner more likely to be received by the customer. There are multiple notifications for the customer in danger of having service interrupted, allowing the customer to seek assistance and combat any other fraudulent notifications that may exist. As of the end of 2021, Evergy has over 622,000 customers enrolled in the outage notification service.

Reduced Truck Rolls – AMI with disconnect and reconnect capabilities allows the Company to utilize electronic communications and deploy remote procedures that eliminate the need for Company personnel to make physical contact. These changes result in lower costs, better collections, fewer on-premise incidents, collection errors, and fewer disconnections. In addition, disconnection and reconnection fees can be drastically reduced for customers with this AMI meter capability.

Evergy currently has a variance to knock and collect rules for its Kansas service territories and will be proposing a similar variance to Missouri's knock and collect rules to unlock these benefits.

Reconnection - Once disconnected, the customer no longer has to call back into the
contact center to request service restoration. When a minimum payment is received
a reconnection order is sent immediately, and the customer's service is typically

1 back on within 15 minutes. This includes during after hours, weekends, and 2 holidays. 3 Energy education - Evergy has partnered with a digital solution provider to help 4 customers manage their energy usage, provide energy savings tips, and perform a 5 rate comparison to ensure that they are on the rate that provides them with the 6 lowest bill, or determine if time-of-use rates would be a good fit for their home. 7 Safety - Reduced safety risks for employees conducting manual reading activities 8 or debt collection resulting from hostile interactions at the premise. Evergy's 9 employees operating in Kansas already are seeing these reduced safety risks with 10 the variance for Kansas knock and collect rules. Evergy will be proposing a similar 11 variance to Missouri's knock and collect rules in the near future. Also, the AMI meters have on-board temperature sensing and alarm capability. This alerts the 12

potential for meter socket fires.

13

14

15

16

17

18

19

20

21

22

• End use disaggregation - Evergy is using AMI data to disaggregate energy usage so that the Company can better design/develop programs for its customers, educate customers on their usage and market to customers for increased program enrollment. One particular use is electric vehicle charging detection. This capability will allow us to understand the impact of electric vehicles charging demand on the system and create rate options from this information.

Company to issues on the premise which cause heating at the meter, reducing the

Power Quality – AMI meters provide visibility to line and load side voltage as well
as voltage sag and swell, improving operational abilities.

4	Q:	Has Evergy identified areas that show potential for future benefit?
3		information from the industry perspective.
2		Company's transition to AMI data aggregation. Please see Schedule BDL-2 for more
1		Many of these benefits were also identified by Itron as part of their evaluation of the

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

A:

Evergy is constantly reviewing how our AMI network can continue to enable future state operations. One of the biggest components of the network is not the physical hardware in the field, it is the data sets that accompany each one of those physical assets. Although we are just starting investigations into the architecture, tools and skill sets needed to further advanced analytics on AMI data, we believe the following use cases show promise:

- Prepay AMI meters allow customers to see in nearly real time their usage and remaining balance on their prepaid utility account providing customers with more information as they make decisions to control their energy usage. A prepay program (Advance Easy Pay) has been proposed in this case with details found in the testimony of Kimberly H. Winslow.
- Network capabilities ability to integrate the radio to other devices such as streetlights for control, maintenance, and asset location/verification for billing.
 Integrate with Distributed Energy Resources devices as well as battery storage and charging applications. The AMI network can be used to communicate with other distribution devices such as capacitor bank controls and voltage regulators.
- Using AMI data to understand the current state of distribution transformers and apply predictive algorithms to predict when they might fail.

1	•	Using AMI event and usage information to validate the Geographic Information
2		System (the Company mapping system) connectivity model and to identify
3		incorrect phase mappings in the model.
4	•	Usage data from AMI meters can be tied to the specs and performance of
5		distribution transformers to find overloaded transformers
6	•	Home Energy Insights – While Evergy has begun to tap disaggregation capabilities
7		using AMI data, increased disaggregation sophistication will only increase the
8		ability for customers to use whole home usage disaggregation to make more
9		informed home energy management decisions. For example, the ability for a
10		customer to see their washer and dryer usage, HVAC system energy use and alerts
11		for appliances left on.
12	•	Behavioral Conservation (Home Energy Calculator) - Assists customers with
13		evaluation of private solar options. Customers can access a solar calculator that
14		leverages their smart meter recorded energy usage history, rate and solar exposure.
15	•	Usage Alert Tools – Through new web capabilities, utilities can use smart meters
16		to create alerts for customers throughout the month if their bills are projected to be
17		higher than normal and could impact the customers expected bill at the end of the
18		month.
19	•	Voltage Load Profile Data - Ability to gain system insight for better energy delivery
20		options. This may drive construction designs and future planning of the system.
21		That data can be used to identify faulty transformers and capacitor banks as well.
22	•	Distributed Energy Resources ("DERs") and FERC Order 2222 - as the use of
23		DERs grow and are influenced by policy changes like FERC Order 2222, the AMI

1 network can help the Company manage these resources and comply with the 2 developing requirement. 3 Does AMI offer the ability to offer more advanced or alternate rate designs? Q: 4 Absolutely. AMI enabled Evergy to introduce TOU rates for its residential customers in A: 5 2019. Further expansion of the TOU rates is proposed in this rate case. Without question, 6 AMI is instrumental in allowing the Company to deploy TOU and other advanced or 7 alternate rate design options. As customers adopt these various rate design, we expect they 8 will better meet the needs of customers and help them efficiently manage their energy use 9 or simply have a better energy experience. The benefit of supporting new rate design is a 10 critical benefit, but it is far from the only benefit. 11 Given the benefits listed here, would you say Evergy and its customers are receiving Q: 12 appropriate value for the investment made in the AMI network? 13 A: Yes. 14 IV. TRANSPORTATION ELECTRIFICATION 15 Please describe your testimony concerning Transportation Electrification. Q: 16 A: At the time of this filing, the Company is awaiting the final order in File No. ET-2021-0151¹⁵ but has closely monitored the Commission discussion on the matter. In the 17 18 December 22, 2021 Agenda Meeting, the Commission gave indication that it was not going 19 to approve the Business EV Charging Service Rate but would look forward to further detail 20 as part of the forthcoming case. I am sponsoring testimony seeking approval of the 21 Business EV Charging Service, Sheet No. 54 and 54A of the Company filing sponsored by 22 Marisol E. Miller's testimony.

¹⁵ Application of Evergy Missouri Metro and Evergy Missouri West for an Order Related to the Approval of a Transportation Electrification Portfolio. Filed February 24, 2021

Q: Please describe the Business EV Charging Service rate.

A:

Evergy proposes a new Business EV Charging Service ("BEVCS") pilot rate option for commercial customers to increase EV adoption, meet workplace employee and fleet EV charging needs, support public electric vehicle service providers networks, and maximize grid benefits of EV charging load at commercial locations. Any commercial customer with an EV charging station is eligible for this rate. While the rate was designed using actual costs and charging patterns at workplace and fleet charging sites, the new rate would be suitable for any commercial EVSP including highway corridors, multi-family dwellings, and other public destinations.

The BEVCS tariff is a TOU rate with three time periods designed to address commercial rate challenges for electric vehicle service providers and encourage workplace and fleet charging during off-peak times when system costs and grid utilization are lower. The BEVCS rate eliminates the demand charge while retaining a facility demand charge in order to incentivize managed charging. Customers must separately meter their EV charging station to participate in the rate and all rate riders and surcharges will apply.

The BEVCS rate was developed to be revenue neutral for a commercial customer with similar annual consumption on the Large General Service ("LGS") rate schedule. The BEVCS customer and facility charges are equal to the charges in the LGS rate schedule. The BEVCS rate does not include a demand charge and will recover these costs in the energy charges. The energy charges were determined by setting the off-peak energy charge equivalent to the third block of the LGS rate which typically represents "third shift" usage. This off-peak energy charge is relatively low but still exceeds Evergy's marginal energy cost. Evergy then calculated the on-peak and off-peak energy charges such that the

combination of customer, facility, on-peak, and off-peak energy charges are revenue neutral when compared to a LGS customer with similar annual consumption and the average LGS customer load profile. In this way, the rate design mirrors many features of the existing LGS rate, while still meeting the anticipated needs of commercial fleets and electric vehicle service providers.

What are the expected benefits of the BEVCS rate?

A:

Q:

A:

The BEVCS rate will encourage customers to shift EV charging to off-peak times while better aligning the cost of charging EV with the cost causation from the grid. The rate offers customers potentially lower and more predictable fuel costs, which will help customers maximize operational savings of EVs. The rate will also allow Evergy to better understand where EV charging is occurring on the system, which will enable further load analysis to support grid management efforts at a time when EV adoption is expected to grow. The TOU rate mitigates adverse grid impacts from new EV charging load, while increasing grid utilization at off-peak periods.

Q: Are there other customer benefits for the rate?

- Yes. The proposed BEVCS rate aligns with Evergy's equity commitment by directly supporting the electrification of commercial customer vehicles and reducing the cost of commercial EV charging to benefit underserved communities. Additional benefits of this rate for commercial customers include:
 - Lower Total Cost of Ownership ("TCO") for public fleets in a position to serve all customers, which will reduce the cost of providing public services through school buses, municipal service fleets, paratransit, rural transit, and public assistance vehicles;

 Lower TCO for commercial EV fleets, which will indirectly lower the cost of goods and services for all customers; and

Q:

A:

 Affordable commercial charging, which will benefit all customers who charge away from home.

Commercial rates, which typically include demand charges, have been identified as significant financial obstacles for electric vehicle service providers and customers looking to electrify their fleets. Direct Current Fast Chargers ("DCFC"), which can draw large amounts of power to quickly charge vehicles, are especially susceptible to the impacts of high demand charges when utilization is low. The combination of high power and extremely low load factor is typical for commercial and industrial use cases and can subject fast charging stations to significant demand-based charges. Without substantial utilization and sales, commercial rates with relatively high fixed costs and demand charges inhibit the ability of charging stations to earn profits or fleets to be electrified economically.

In addition to an overall reduction in the cost of operations, many commercial fleet operators expect fleet electrification to provide a reduction in their fleet's carbon emissions. Evergy has included a Carbon Free Energy Option in the BEVCS tariff for customers that want their fleet's EV charging to be carbon free. Under this option, Evergy will procure RECs to offset energy provided from non-carbon free sources.

Can you offer a detailed example of how the BEVCS rate might be used?

Yes. The State of Missouri is a beneficiary of the Volkswagen Diesel Emissions Environmental Mitigation Trust. The Trust was formed after the 2016 settlement with the United States of complaints against Volkswagen AG, et al. The settlement resolved claims that Volkswagen violated the Clean Air Act. As the lead agency, the Missouri Department

of Natural Resources developed a 10-year Beneficiary Mitigation Plan for awarding more than \$41 million to Missouri-specific projects by October 2027. One of the projects is School Bus Replacement. Evergy has been made aware that the 2022 awards for Volkswagen School Bus Replacement Program were announced on November 9, 2021¹⁶ by the Missouri Department of Natural Resources. There will be six new all electric buses in Evergy's Missouri service area¹⁷. These school districts and the contractor are aware of the proposed BEVCS rate and have expressed interest. If approved, these customers could rely on the rate design to reduce the cost of charging and the ongoing cost of operating these new vehicles. Success of these initial bus replacements would likely lead to the deployment of additional buses in the future.

11 Q: Did Staff offer a recommendation on the BEVCS rate in Docket ET-2021-0151?

- A: Yes. Staff recommended the Commission reject the Company's proposed BEVCS and Electric Transit Service ("ETS") rate schedules absent a general rate proceeding. Further, Staff raised three specific concerns about the rate design,
 - The rate values contemplated require additional study and refinement, as do
 the terms of service including the Renewable Energy Credit ("REC")
 acquisition/retirement program.
 - 2. The Company has calculated the rate values using the assumptions that an EV charging station is similar to that of a Large General Service ("LGS") customer and will cause no additional transmission and capacity costs and seeks to implement these rate schedules outside of the context of a general rate proceeding and without evaluating all relevant factors.

¹⁶ https://dnr.mo.gov/document-search/fiscal-year-2022-volkswagen-school-bus-awardees-alternates

¹⁷ One bus each for Princeton and South Harrison. Four buses for First Student in Park Hill (a bus contractor).

1		3. It is not reasonable to develop a rate schedule based on applying assumed
2		revenue levels from a given size of customer to customers of significantly
3		different sizes, let alone to do so in the absence of billing determinants, cost
4		of service data, and other vital information determined only in the context
5		of a general rate proceeding.
6	Q:	Do you agree with Staff's contention that the proposed BEVCS rate requires
7		additional study and refinement?
8	A:	Not entirely. I believe these rates were appropriate for use in the pilot and would have
9		provided just and reasonable pricing for customers receiving service under these rates when
10		proposed in the ET-2021-0151 case. However, now that we have available additional cost
11		studies, we can confirm the proposed pricing. As noted in my surrebuttal testimony in the
12		ET-2021-0151 case, I expect these rates will mature as the pilot progresses and I anticipate
13		further refinement.
14	Q:	What is your response to the Staff concerns raised in File No. ET-2021-0151 about
15		using the LGS rate as the basis for the proposed BEVCS rate?
16	A:	I understand the uncertainty, but the Company feels the LGS rate offers the best model for
17		development of the BEVCS rate. Although the various charging stations have a wide range
18		of demands, the LGS rate is situated near the upper middle of that range. Presuming that
19		stations will tend to be larger to facilitate shorter charging times, this positioning is well
20		suited. Further, the LGS rate provided for Customer and Facilities Demand charges more
21		appropriate to the expected loads than the Medium General Service rate. I would also note
22		that in the December 22, 2021 Agenda meeting, the Commission appeared to support the
23		Electric Transit Service Rate that was designed using an identical approach.

Q:	Do you believe it was appropriate to design the proposed BEVCS rate based on the
	LGS rate?
A:	Yes. The LGS rate provides a reasonable foundation for the BEVCS rate design.
Q:	In File No. ET-2021-0151, Staff further asserted that the Company's proposed
	BEVCS rate schedule does not prohibit separately metered EV charging stations
	from being served on one of Evergy's existing rate schedules and, therefore, the
	BEVCS rate schedules are not needed for EV charging stations to be served. Do you
	agree with assessment?
A:	The point is true, but the existing rate schedule designs are poorly suited for EV charging.
	As noted in the Company Report filed in File No. ET-2021-0151, the use of a demand
	charge is commonly discouraged for EV charging as it creates a significant financial
	obstacle for customers. The combination of high power and extremely low load factor is
	typical for commercial and industrial use cases and can subject charging stations to
	significant demand-based charges.
Q:	In proposing the BEVCS rate as part of this rate case did you consider additional
	information in determining the appropriateness of the designs?
A:	Yes. The rate designs for the BEVCS rate were reviewed again and evaluated considering
	the Transportation Electrification proceedings in Missouri and Kansas occurring since the
	designs were originally completed. The approaches and assumptions used in the design
	remain appropriate and produce a reasonable rate. The pricing was adjusted to reflect the
	revenue increase proposed in this case and to remain revenue neutral with the Large
	General Service reference rate.
	A: Q: Q:

V. EMERGENCY ENERGY CONSERVATION PLAN

A:

Q: Please describe your testimony concerning the Emergency Energy Conservation Plan.

The Emergency Energy Conservation Plan is a section of the Evergy General Rules and Regulations. For Evergy Missouri Metro the primary language is in Section 17 found on Sheet 1.59 through 1.63. A related portion is found in Section 3.10 on Sheet 1.12. These Sections detail the company process for conservation, curtailment, interruption, or suspension of service, particularly during emergency conditions.

In February 2021 an unprecedented cold weather event (commonly referred to as Winter Storm Uri) occurred causing operational and market disturbances that led to interruptions for some Evergy customers. As part of the discovery associated with AO-2021-0264, the Commission's investigation into the *Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Investor Owned Utilities* issued February 24, 2021, the topic of the Emergency Energy Conservation Plan was raised ¹⁸. In response to that discovery, Evergy detailed that the Company had followed operating instructions from the Southwest Power Pool ("SPP") and followed an Evergy Emergency Operations Plan ("EOP") during the Cold Weather Event. Although the EOP is asserted to be consistent with the intent captured in the Emergency Energy Conservation Plan, the Company indicated it would review and consider updates to the Emergency Energy Conservation Plan. I am detailing the proposed changes to that portion of the Evergy tariffs.

Q: Are you aware of the genesis of the Emergency Energy Conservation Plan?

21 A: Yes. The Emergency Energy Conservation Plan was established in 1978 in response to a lengthy United Mine Workers strike. According to a May 1, 1979 Missouri Public Service

¹⁸ Staff Data Requests 0002, 0045, 0065, 0067 and 0068

Commission Annual Report to the Governor when describing the Commission response to the strike,

"As a result of the emergency, all twelve regulated electric utilities, under a Commission directive, filed curtailment plans which outline how the utilities will cut back electricity if necessary. Three elements included in all curtailment plans are, an exemption for customers who provide essential public services, specifics on the order of curtailment in the event it becomes necessary, and language that requires Commission approval before there is significant curtailment that will significantly effect customers".

A:

A:

The predecessor company of Evergy was part of the utility group mentioned.

Q: Did Evergy review the adequacy of the Emergency Energy Conservation Plan?

Yes. Evergy has found that the Emergency Energy Conservation Plan is no longer applicable to the operations of the Company. The Company is now subject to operational and reliability requirements set by North American Electric Reliability Corporation ("NERC") and SPP. Evergy had documented plans consistent with guidance from those groups and will utilize those plans to respond to emergency conditions of the nature contemplated by the Emergency Energy Conservation Plan. As a result, Evergy proposes to revise the applicable Sections of its General Rules and Regulations.

Q: Please describe the proposed revision?

Evergy proposes to eliminate much of the language from 1978 and instead identify the reliance on a Load Management and Manual Load Shed Plan (formerly the Emergency Operations Plan). The Load Management and Manual Load Shed Plan complies with NERC Standard EOP-011-1 concerning Emergency Operations, establishing processes to respond to predefined Energy Emergency Alert Levels and is reviewed by the SPP Reliability Coordinator. Evergy proposed to highlight key contents of the Load Management and Manual Load Shed Plan within the tariff, but to keep the Load

	Management and Manual Load Shed Plan itself outside of the tariff. This approach will
	allow for more timely response and compliance with NERC and SPP guidance.
Q:	Will the Commission retain appropriate visibility to the Emergency Energy
	Conservation Plan under the proposed revision?
A:	Yes. The Commission and/or Commission Staff will be notified as soon as practical when
	the Emergency Energy Conservation Plan is initiated and completed. The Commission
	Staff will be notified when the Emergency Energy Conservation Plan is revised.
	VI. LIGHTING
Q:	Please describe your testimony concerning Lighting.
A:	My testimony will give additional context to the rate design approaches used for unmetered
	lighting proposed in this case. Unmetered lighting is the general categorization of our
	municipal street lighting service and private area lighting service. As detailed by Company
	witness Marisol E. Miller, not all lighting components were priced similarly in the Evergy
	application of the requested revenue increase.
Q:	What approach was taken to apply the requested increase?
A:	The increase for Lighting was applied as follows:
	• The adder components (i.e., additional poles, wire spans, etc.) that are common
	between LED and non-LED rates have been equalized.
	• Non-LED lighting components were allotted the balance of the increase at 4.7%
	with the mercury vapor lighting getting the highest percentage increase at 6.25%.
	• LED and traffic lighting were not increased.
	A: Q: A:

Q: Why was this approach taken?

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

A:

A:

Beginning in 2017, the Company began a systematic conversion of its Municipal Street Lighting to LED technology. Rates for the LED luminaires were set at the time based on costs, but the rates for non-LED fixtures were pre-existing and often lower than the observed costs. To facilitate the conversion and avoid additional bill impacts, rates for non-LED fixtures were left as they were. Now that the conversion is complete, the Company is finding that customers are hesitant to leave these obsolete non-LED technologies in part because of the unbalanced pricing. Beginning with this case, the Company proposes to increase the rates of non-LED fixtures and related components at a higher amount than the LED luminaires to eliminate the unbalanced pricing and remove the irrational incentive to maintain the obsolete lighting options.

Q: Did the obsolescence of non-LED lighting impact any other part of this filing?

Yes. There are a significant number of items on the lighting tariffs that are obsolete following the conversion to LED and are no longer used for service to customer. They are related to mercury vapor or high-pressure sodium bulb technologies and unused optional equipment. The Company is removing these obsolete options from the various lighting tariff sheets.

VII. SOLAR SUBSCRIPTION

- 19 Q: Please describe your testimony concerning Solar Subscription.
- 20 A: Evergy has been monitoring developments with Ameren's Community Solar Program in 21 File No. ER-2021-0240 and is aware of a number of changes offered in a Unanimous

Stipulation and Agreement to convert the pilot program to a permanent program.¹⁹ The 1 2 Stipulation and Agreement states: 3 M. Community Solar. 4 24. The permanent Community Solar Program as proposed by the Company should 5 be approved, but with the following modifications to the Company's proposal: (1) 6 Language will be added to the proposed tariff allowing transfer of the Community 7 Solar pilot program resource to the extent pilot participants desire to participate under the permanent program terms; (2) permanent program resource construction 8 9 cannot begin until 70% of a resource for the permanent program is subscribed; (3) 10 shareholders to bear the risk for any undersubscribed portion of the permanent 11 Community Solar program to a 50% undersubscribed threshold, provided, that if 12 the subscription rate falls below 50%, non-participant ratepayers would shoulder 13 the costs; and (4) Market costs and revenues for any undersubscribed portion of a 14 permanent program resource will be allocated to shareholders and not flow through 15 the FAC. 16 17 As Ameren's Community Solar Program is similar to the Evergy Solar Subscription Pilot 18 Rider in most regards, Evergy would like to propose similar terms be applied to the Solar 19 Subscription Pilot Rider. 20 Q: What changes are you proposing for the Solar Subscription Pilot Rider? 21 A: Consistent with the changes made to the Ameren program, the following are proposed: 22 Convert the Solar Subscription Pilot Rider to a permanent program. With this change 23 we would rename the program to "Solar Subscription Rider" and the Schedule 24 designation from "SSP" to "SSR". 25 Reduce the subscription threshold required to construct from 90% subscribed to 70% 26 subscribed. Given the timeframe for approvals and subsequent construction after a

90% threshold is achieved, today customers have a long wait time for the process to

complete. Reducing the threshold would shorten that period. It is realistic to expect

27

28

¹⁹ ER-2021-0240, Unanimous Stipulation and Agreement, November 24, 2021 Approved by the Commission on December 22, 2021.

- that enrollment rates would achieve full enrollment by the time this process ends if it
 can start at lower threshold.
 - Establish a threshold for shareholder responsibility of unsubscribed portions of the resource. The Company proposed to set the threshold at 50% where Evergy will bear full responsibility for unsubscribed, consistent with the Ameren approach. Currently, Evergy is responsible for 75% of all unsubscribed amounts.

7 Q: Are you proposing any additional changes?

- 8 A: Yes. Consistent with the intent of converting the tariff to a permanent program but due to
 9 differences in the Solar Subscription Pilot Rider tariff, we have other changes. The
 10 following changes are proposed:
 - Eliminate the requirements limiting the system size to one 5.0 MW system or two 2.5MW systems located in each of the Evergy Missouri jurisdictions for increased flexibility to respond to customer preferences.
 - Remove limitations for non-residential participation. The tariff is currently limited to 50% non-residential participation. The Company is aware of one commercial customer who was interested in participating but their need could not be met under the current jurisdictional cap with the requirement for pre-enrollment. More so than a residential customer, business customers typically prefer to purchase their energy from a direct renewable resource, as provided for in the Solar Subscription Pilot Rider versus a green renewable program. Evergy is proposing green renewable program (Green Pricing REC Program), which only allows the customer (residential or business) to claim the benefits of renewable electricity without actually buying it.

Remove section defining Pilot Evaluation terms. As the program would no longer be
a pilot, this additional evaluation is not relevant. Evergy would commit to provide the
identified reporting in the Pilot Evaluation section for the resource currently being
developed under the existing tariff.

A:

- Remove constraints on program expansion. Currently the tariff requires the Company demonstrate 90% subscription of the initial system for two years before allowing additional subscriptions. In practice, the two-year delay would become three years when adding the construction time for a subsequent system. This language serves only to delay the Company's ability to respond to customer demand for solar energy.
- Q: This tariff was approved in 2018 and the Company is in the early stages of making this service available to customers. Why do you believe the tariff should be revised now?

As we observe developments in the state, it is clear that the concept of a solar tariff is becoming more accepted by the Commission and parties than it was in 2018 when the Evergy tariff was established. Compared to other tariffs, the current Evergy design is restrictive and incorporates a number of provisions that would constrain expansion of the program. Since revision of the tariff is best addressed within a general rate proceeding, opportunities are limited and the time required to achieve changes is long, we prefer to address this now, improving the potential to respond in a timely way to future customer interest in the program.

1	Q:	Will these proposed changes materially impact the efforts underway to execute the
2		first solar resource under the existing tariff?
3	A:	No, due to the progress made to this point, many of the criteria, particularly the enrollment
4		thresholds and system size limitations have been met. The most significant changes will
5		be the removal of delay for future expansion. As previously stated, Evergy commits to still
6		provide the identified reporting in the Pilot Evaluation section for the proposed solar
7		facility currently being developed under the existing tariff, following two years of
8		operation.
9	Q:	Are any of the pricing elements of the Solar Subscription tariff being changed?
10	A:	Yes. Solar Block Subscription Charge will be changed to \$0.1308 per kWh to reflect the
11		new cost of the resource, of which the Solar Block Cost is \$0.0908 per kWh. The Service
12		and Access charge will be increased according to the terms of the tariff by the average
13		percentage change to volumetric rates as established by the current tariff language or
14		5.65%. This would change the charge of \$0.038 per kWh to a charge of \$0.040 per kWh.
15		Tariffs supporting the proposal are found on Sheet 39 through 39E of the Company
16		filing sponsored by Marisol E. Miller's testimony.
17	Q:	Does that conclude your testimony?
18	A:	Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc. d/b/a Evergy)	
Missouri Metro's Request for Authority to)	Case No. ER-2022-0129
Implement A General Rate Increase for Electric)	
Service)	

AFFIDAVIT OF BRADLEY D. LUTZ

STATE OF MISSOURI)	
)	SS
COUNTY OF JACKSON)	

Bradley D. Lutz, being first duly sworn on his oath, states:

- 1. My name is Bradley D. Lutz. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Director Regulatory Affairs.
- 2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Evergy Missouri Metro consisting of fifty-six (56) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.
- 3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

Bradley D. Lutz

Subscribed and sworn before me this 7th day of January 2022.

Notary Public

My commission expires: 4/2u/w25

ANTHONY R. WESTENKIRCHNER
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 26, 2025
PLATTE COUNTY
COMMISSION #17279952



Missouri

Seasonal Study Evergy Missouri Metro Final Report 1/7/2022

Table of Contents

I Intro	oduction & Purpose	3
II Glo	ssary	3
III Cu	rrent State of Billing Periods	4
IV Pro	pposed State of Billing Periods	5
V Sco	pe and Methodology of Analysis	7
VI Su	mmer Season Billing Period Analysis	7
1.	Seasonal Billing Periods at Other Utilities	7
2.	System Peak Load Analysis	8
VII Cu	stomer Bill and Revenue Impact Analysis	10
1.	Annualized Bill Impact by Customer	10
2.	Normalized, Annualized Revenue Impact	11
VIII C	onclusion	12

I Introduction & Purpose

In the most recent Evergy ("Company") Missouri rate cases filed in Dockets ER-2018-0145 and ER-2018-0146, a non-unanimous partial stipulation and agreement was reached concerning rate design issues. In this agreement, the Company agreed to study the alignment of billing seasons between their two Missouri jurisdictions - Metro and West. The purpose of this report is to outline the results of the study and make a recommendation.

The Study begins by summarizing the current state of seasonal billing periods across the Missouri jurisdictions to highlight the jurisdictional differences. With differences identified, a solution is proposed to better align the jurisdictions and demonstrate how the seasonal billing period alignment can affect customer bills. To support the reasonableness of the proposal, a summer season billing period analysis was then conducted to compare the proposed summer season to similar utilities, and the seasonal relationship to system peak. Finally, a revenue impact analysis is performed to size the annual effect of implementation to expected Company revenues. The results of the study serve as a basis for the Company's recommendation to align the Missouri Metro jurisdiction's seasonal billing periods with the seasonal billing periods used in the Missouri West jurisdiction.

II Glossary

Term	Description	Example
Billing Determinant	A value or quantity on a bill that determines the bill total: Billing Determinant X Price = Bill Total (5)	The kilowatt hours of usage associated with a bill represent the billing determinants for the energy component of a bill, whereas the peak kilowatt demand associated with the bill represents the billing determinants for the demand component of a bill.
Seasonally Differentiated Rate Component	The parts of the bill that charge different rates based on the season the associated billing determinants are categorized under	An energy charge is often a seasonally differentiated rate component because most tariffs apply different energy charges based on the season, whereas a customer charge is often not a seasonally differentiated rate component because most tariffs do not apply different customer charges based on the season.
Seasonal Proration	A method used to proportionately apply both seasonal rates to the same type of billing determinants based on the number of billing days associated with each season	If a 30-day bill has a billing period where 15 days fall under the winter season and 15 days fall under the summer season, then a seasonally differentiated rate component such as an energy charge will price half (15/30) of its determinants at the winter rate and the other half (15/30) at the summer rate.

III Current State of Billing Periods

Across both Missouri jurisdictions, most retail tariffs contain seasonally differentiated rate components. Seasonal differentiation works by categorizing customer billing determinants as either "Summer" or "Winter". However, the date range that defines a season, as well as the application, differs across jurisdictions. Each jurisdiction defines their seasons as follows:

<u>Missouri West</u> – "For the determination of Seasonal periods, the four (4) summer months shall be defined as the four (4) monthly billing periods of June through September. The eight (8) winter months shall be defined as the eight (8) monthly billing periods of October through May."

<u>Missouri Metro</u> – "The Summer Season is four consecutive months, beginning and effective May 16 and ending September 15, inclusive. The Winter Season is eight consecutive months, beginning and effective September 16 and ending May 15. Customer bills for meter reading periods including one or more days in both seasons will reflect the number of days in each season."

As shown above, there are two jurisdictional differences regarding the application of a seasonal component on billing. First, there is a difference in the dates used to define the summer and winter seasons. For instance, Missouri Metro defines the summer season as May 16 to September 15, whereas Missouri West defines the summer season as June through September billing months.

The second difference pertains to proration. Proration is a process used within the Company billing system to manage customer bill calculations occurring at transitions of the billing period and rate changes. If a bill's billing period contains days that fall within both the summer and winter season, as defined by the corresponding tariff, the rates are currently applied differently across the jurisdictions. In Missouri Metro, a seasonal proration is applied by calculating how many billing days fall under the summer period relative to the total number of billing days, and how many billing days fall under the winter period relative to the total number of billing days. The resulting fractions are used to determine how many billing determinants should be calculated using the summer versus winter tariff rate. In Missouri West, there are no seasonal prorations applied. Without seasonal proration, a bill that contains days that fall within both the summer and winter season is calculated using either the summer or winter tariff rate depending on which month the bill is categorized under. For example, if a billing period contains 20 days within May, and 10 days within June, with a statement date of June 10th, the bill without seasonal proration will apply summer rates across the entire bill because June 10th falls within the summer season, regardless of whether the 20 days in May were during the winter season.

The differences are summarized in the following table on Figure 1 (Note - The corresponding winter date range includes all days not included in the summer season):

FIGURE 1: SUMMER SEASON & PRORATION METHOD JURISDICTIONAL COMPARE

	Summer Season		
	Start Date	End Date	Proration Method
MO West	June 1	September 30	No Proration
MO Metro	May 16	September 15	Proration by Days

IV Proposed State of Billing Periods

In an effort to align Missouri jurisdictions, the Company proposes a change in the summer season billing period in Missouri Metro from "May 16 – September 15" to "June 1 – September 30" which would align the summer billing months across both the Missouri jurisdictions. The change in the summer season date range would be coupled with a change in the winter season date range in Missouri Metro from "September 16 – May 15" to "October 1 – May 31" which would align the winter billing months across the Missouri jurisdictions.

The effect of the proposed seasonal billing period change in Missouri Metro is demonstrated by an example on Figure 2. The example uses a single bill requiring proration at the start of the summer season. The table on the left calculates billing determinants and bill amounts under the current seasonal billing periods. The table on the right calculates billings determinants and bill amounts under the proposed seasonal billing periods. By calculating the same bill side by side using the current and proposed seasonal billing periods, Figure 2 examines how a bill could be calculated differently by changing the seasonal dates in Missouri Metro to align with the seasonal dates in Missouri West. The outcome in the Figure 2 example shows a decrease in a customer's bill from \$203.20 to \$179.52. However, keep in mind that the billing period change would have an opposite impact on a customer's bill if we looked at a bill being prorated at the end of the summer season versus the start. For more information on the net impact caused by the change in seasonal billing period dates, review Section VII Customer Bill and Revenue Impact Analysis.

FIGURE 2: BILL CALCULATION EXAMPLE FOR PROPOSED CHANGE

Bill Details & Tariff Rates

Billing Start Date 5/10/2021 Billing End Date 6/9/2021 Total kWh Usage 1,109.28

 Summer
 Winter

 Customer
 \$11.47
 \$11.47

 Energy
 \$0.17951
 \$0.13949

Calculation Under Current Seasonal Periods

Because the Summer Season begins on **May 16**, this bill contains 5 winter days and 25 summer days.

If 5 out of 30 days are winter, then 5/30 or 17% of the bill's total seasonal determinants are considered winter determinants:

Winter kWh Usage = Total kWh Usage * Winter Proration

Winter kWh Usage = 1,109.28 * 17% Winter kWh Usage = <u>184.88</u>

If 25 out of 30 days are summer, then 25/30 or 83% of the bill's total seasonal determinants are considered summer determinants:

Summer kWh Usage = Total kWh Usage * Summer Proration
Summer kWh Usage = 1,109.28 * 83%
Summer kWh Usage = 924.40

Winter seasonal determinants are priced at the winter rate:

Winter Energy Bill Amount = 184.88 * \$0.13949 Winter Energy Bill Amount = \$25.79

Summer seasonal determinants are priced at the summer rate:

Summer Energy Bill Amount = 924.40 * \$0.17951 Summer Energy Bill Amount = <u>\$165.94</u>

The bill amount from each season of a seasonal bill component can be summed together to get the total seasonal bill component bill amount:

Energy Bill Amount = \$25.79 + \$165.94 Energy Bill Amount = <u>\$191.73</u>

The bill amount from each bill component can be summed together to get the total bill amount:

Total Bill Amount = Customer Bill Amount + Energy Bill Amount Total Bill Amount = \$11.47 + \$191.73

Total Bill Amount = \$203.20

Calculation Under Proposed Seasonal Periods

Because the Summer Season begins on **June 1**, this bill contains 21 winter days and 9 summer days.

If 21 out of 30 days are winter, then 21/30 or 70% of the bill's total seasonal determinants are considered winter

Winter kWh Usage = Total kWh Usage * Winter Proration
Winter kWh Usage = 1,109.28 * 70%
Winter kWh Usage = <u>776.50</u>

If 9 out of 30 days are summer, then 9/30 or 30% of the bill's total seasonal determinants are considered summer determinants:

Summer kWh Usage = Total kWh Usage * Summer Proration
Summer kWh Usage = 1,109.28 * 30%
Summer kWh Usage = <u>332.78</u>

Winter seasonal determinants are priced at the winter rate:

Winter Energy Bill Amount = 776.50 * \$0.13949 Winter Energy Bill Amount = \$108.31

Summer seasonal determinants are priced at the summer rate:

Summer Energy Bill Amount = 332.78 * \$0.17951 Summer Energy Bill Amount = <u>\$59.74</u>

The bill amount from each season of a seasonal bill component can be summed together to get the total seasonal bill component bill amount:

Energy Bill Amount = \$108.31 + \$59.74 Energy Bill Amount = <u>\$168.05</u>

The bill amount from each bill component can be summed together to get the total bill amount:

Total Bill Amount = Customer Bill Amount + Energy Bill Amount Total Bill Amount = \$11.47 + \$168.05

Total Bill Amount = <u>\$179.52</u>

V Scope and Methodology of Analysis

The analytical approach for this study starts by determining the optimal seasonal billing period based on system capacity. To assess the reasonableness and appropriateness of modifying the existing seasonal billing period, the study assembled and reviewed system load data from July 2020 to June 2021. The analysis went further by reviewing the seasonal periods used by other utilities as a reference point.

The study incorporates the following seasonal billing period analyses to recommend a change in the determination of seasonal billing periods:

- 1. Seasonal Billing Periods at Other Utilities
- 2. System Peak Load Analysis

After a seasonal solution is determined, customer impact and overall revenue impact analysis was conducted. Customer billing data was used to calculate bill determinants and revenues under the current seasonal period, and again after the proposed seasonal date alignment is applied to compare the effects. The billing data utilized for these analyses falls within the test year of July 2020 to June 2021 to provide an annual view. Unlike the system peak load analysis which looks at both Missouri jurisdictions, the bill and revenue impact analyses only include data for Missouri Metro because only Missouri Metro bills will be impacted by the recommended seasonal alignment.

The study incorporates the following bill and revenue impact analyses to observe the estimated effects caused by the seasonal period alignment:

- 1. Annualized Bill Impact by Customer
- 2. Normalized, Annualized Revenue Impact

VI Summer Season Billing Period Analysis

1. Seasonal Billing Periods at Other Utilities

A review of other regional utilities residential tariffs was conducted to determine how other electric providers address seasonality and determine if there may be appropriate pricing period alternatives for the Company to consider. For the utilities with summer seasons, seven (7) of the thirteen (13) define the summer season as the billing months of June through September or June 1 through September 30. Two utilities (Alliant-IPL and Liberty) define a fourmonth Summer Seasons with mid-month transitions.

Based on this review, the most common summer season adopted by regional utilities is a four-month period defined as the billing months June-September or calendar period June 1 through September 30. A summary of the Seasonal Billing Periods at Other Utilities is shown on figure 3.

FIGURE 3: RESIDENTIAL RATES SUMMER SEASON SUMMARY

STATE	UTILITY	Summer Period Definition	Whole Month Period
IL	Ameren-IL	June, July, Aug & Sept. monthly periods	Х
МО	Ameren-MO	June 1 through Sept 30, prorated (2021)	Х
IA	MidAmerican	4 monthly billing periods June through September	х
IA	Alliant-IPL	May 16 to September 15	
WI	Alliant-WPL	Calendar months June, July & August	х
OK	OG&E	5 Revenue Months June through October	х
OK	AEP-PSO	Billing months June through October, inclusive	х
МО	Liberty	4 monthly billing periods on or after June 16	
KS	Liberty	No Summer Season	
AR	Entergy-AR	June - September	Х
СО	Xcel-CO	June 1 through September 30	х
NE	OPPD	June 1 through September 30	Х
MN	Xcel-MN	June - September	х

2. System Peak Load Analysis

In this section, we present the review of the Company's July 2020 to June 2021 system load data, which indicates a seasonal pattern. In figures 4 and 5 below, excluding the month of February which contained a cold weather event, each jurisdiction exhibited highest daily peak loads in the four (4) months of June, July, August, and September, the range that falls between the two vertical red lines shown on the graphs. Because a customer's contribution to system peak load is a significant cost factor, the results support a June-September summer season alignment between both Missouri jurisdictions.

FIGURE 4: JULY 2020 – JUNE 2021 MO METRO DAILY PEAK, AVERAGE & MINIMUM LOADS (MW)

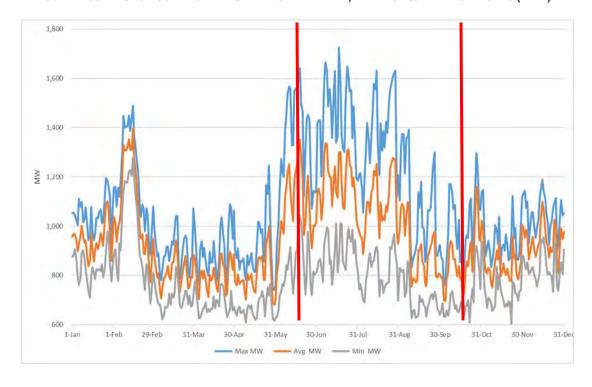
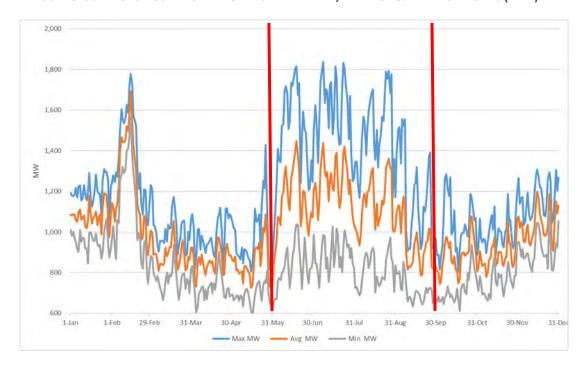


FIGURE 5: JULY 2020 - JUNE 2021 MO WEST DAILY PEAK, AVERAGE & MINIMUM LOADS (MW)



VII Customer Bill and Revenue Impact Analysis

The analysis summarized in this section utilizes Missouri Metro customer billing data within the test year of July 2020 to June 2021. The billing data has been recalculated to allow for individual bills and overall revenue effects to be observed before and after the seasonal date change is implemented.

1. Annualized Bill Impact by Customer

The Annualized Bill Impact by Customer analysis is based on actual determinants and only includes data for customers who have 12 months of billing history within the test year to ensure the results reflect the annual effects by customer. Customers included in analysis would have to reside on a rate that applies seasonal differentiation and that would be impacted by the seasonal change. Therefore, customers on rates that do not differentiate rates based on season, such as those in the Lighting class, were not included in the Annualized Bill Impact by Customer analysis. With all the above factors considered, 226,032 of our 288,521 customers were analyzed.

An overwhelming majority, or 99.9%, of the 226,032 customers analyzed are estimated to see their bills increase or decrease by less than 5% on an annual basis. The median customer is estimated to see their bill change by -0.07% on an annual basis. In other words, a typical customer should expect to see their bill (taxes, riders, & credits excluded) change by -\$0.70. The range of impact on customers can best be visualized in Figure 6.

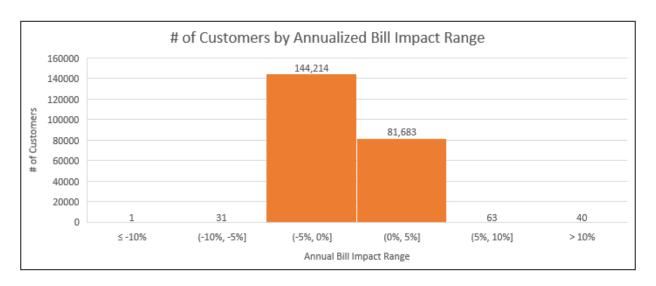


FIGURE 6: NUMBER OF CUSTOMERS BY ANNUALIZED BILL IMPACT RANGE

2. Normalized, Annualized Revenue Impact

The Normalized, Annualized Revenue Impact analysis utilizes Missouri Metro test year billing determinants that have been annualized and normalized to represent a normal year, comparable to what one would observe in a rate case filing. The study utilizes two separate billed revenue models, both of which represent the Company's current rate structure. One document is based on the billing determinant and revenue data without any seasonal changes being applied. The second billed revenue document is based on the billing determinant and revenue data with the seasonal date alignment applied. The two billed revenue documents are compared to one another to measure the estimated total effect on revenues. The aggregated effects are summarized in the tables below. Based on the degree of change in total and by class, a change in the seasonal dates appears to have minimal impact to overall revenues.

FIGURE 7: TOTAL NORMALIZED, ANNUALIZED REVENUE IMPACT

Normalized, Annualized Revenue Impact			
Before Change \$843,294,974			
After Change	\$842,942,891.74		
Total Change	-\$352,082.90		
Total Change %	-0.04%		

FIGURE 8: TOTAL NORMALIZED, ANNUALIZED REVENUE IMPACT BY CLASS

Class	Before Change	After Change	Diff	Diff %
RES	\$341,159,142.81	\$341,072,261.89	-\$86,880.92	-0.0255%
SGS	\$68,617,737.48	\$68,558,084.73	-\$59,652.76	-0.0869%
MGS	\$121,656,929.77	\$121,612,062.48	-\$44,867.29	-0.0369%
LGS	\$180,373,757.71	\$180,236,999.24	-\$136,758.46	-0.0758%
CCN	\$74,563.92	\$74,563.92	\$0.00	0.0000%
LPS	\$121,482,208.12	\$121,458,284.64	-\$23,923.47	-0.0197%
Lighting	\$9,930,634.83	\$9,930,634.83	\$0.00	0.0000%

VIII Conclusion

Based on the analysis summarized in this report, it is recommended that the Company adopt a summer season billing period aligned with the calendar period June 1 through September 30 in the Missouri Metro jurisdiction. This will provide the proper alignment of the summer season with the 4-month period of greatest system demand. Furthermore, the study concludes that this proposal would have a minimal annual impact on individual customer bills and company revenue. The Company has incorporated this recommendation as part of the 2022 Evergy MO Metro Rate Case, Docket ER-2022-0129. The effective date for the recommendation is contingent on commission order and expected to be no later than 12/7/2022.



Electric | Gas | Water information collection, analysis and application

Advanced Metering Infrastructure (AMI) Study

Submitted to:

Evergy

Submitted by:

Itron, Inc. 20 Park Plaza Boston, Massachusetts 02116 (617) 423-7660



December 2021

Contents

1.	Overview	1
2.	A LITTLE HISTORY	3
	THE THIRD PHASE – LOAD ANALYSIS	
4.	BENEFITS OF AMI	10
5.	EVERGY'S TRANSITION TO AMI FOR LOAD ANALYSIS	12
6.	USE OF AMI DATA AGGREGATION FOR CURRENT RATE CASES	14
7	SUMMARY	17

1. Overview

Recently, Evergy has transitioned from Load Research to AMI-based analysis. The first steps included replacing load research customer samples collected from load research meters with customer sample points from the AMI (Advanced Meter Infrastructure) database. The next step was a full transition to AMI. This entailed replacing sample-based hourly load profiles with 100% AMI load aggregation.

As part of this transition effort, Itron was contracted to review Evergy's AMI aggregation process, evaluate Evergy's load aggregation results, and compare these against peer utilities who are also utilizing AMI data for load analysis. The study and results offered in this report, entailed reviewing the development of AMI data for load analysis, interviewing other electric utilities about their AMI effort, issues, and applications, and assessing Evergy's AMI roll-up effort.

1.1 Transition from Load Research to AMI

Utility load research has long been the primary means of developing customer class and rate code hourly load estimates to support utility analytics including cost of service studies, rate design, evaluating energy efficiency programs, weather normalization, financial analysis, and forecasting. Load research involves designing and implementing rate class samples, managing, and validating sample interval data, and utilizing complex statistical-based expansion methods to translate a sample into system-level rate class hourly loads. The load research process is complex requiring systems and staff expertise in sample design, data processing and validation, and statistical sample expansion methods. Organizations including the Association of Edison Illuminating Companies (AEIC) Load Research Subcommittee and the Western Load Research Association have focused on load research methods, training, and applications for decades.

Customer interval data collected through AMI makes possible the replacement of load research with load aggregation. While AMI load aggregation is beginning to replace load research, the transition has been slow. Meter Data Management Systems (MDMS) where AMI data is stored, were designed for processing and validating meter input data, and using the data for calculating customer bills; the MDMS was never designed for aggregating customer interval data, let alone analysis. This has required developing new applications, many that remain constrained by computing resources and associated costs as aggregating hundreds of thousands of interval data requires significant computer processing capacity. Yet utilities are making progress taking advantage of improvements in existing database applications, new database

applications, declining computer processing costs, and technologies allowing utilities to utilize cloud-based servers and software.

The value of AMI data for load analysis is significant. AMI data provides improved clarity on how our customers use electricity, smaller error variance when compared with load research that in turn results in more accurate forecast, and ultimately, improved confidence in the data used in basing utility financial analysis, resource planning, rate cases, and overall business activity.

Utilities that have built out load aggregation capabilities are utilizing AMI data for numerous applications that include:

- Developing rate class hourly load profiles for cost of service and rate design
- Calculating unbilled sales and revenue
- Forecasting calendar-month/booked sales
- Developing end-use load shapes for long-term planning forecasts
- Estimating daily weather-response models
- Tracking forecast performance
- Tracking COVID's impact on loads and revenue

While utilities have been collecting customer interval data since as early as 2000, the aggregation of AMI data for load analysis is relatively recent. The process for aggregating load data across thousands, if not millions of customers has been difficult with little industry standardization. Utilities basically have had to figure out how to aggregate AMI data on their own, learning from mistakes made along the way. Factors that have made load aggregation difficult include:

- Meter data management systems (MDMS) meant to capture data and not designed for adding up large volumes of customer interval data
- Linkage to customer information data systems that aren't readily or automatically compatible
- Data complexity
- Lack of cost-effective software and hardware solutions
- Lack of staff with big data skills or familiarity with new distributed base software applications.
- Poor value proposition failure to internally "sell" the value of AMI load

These impediments are slowly diminishing as utilities implement processes for exporting and linking interval and customer information data, computer processing

costs decline, and new software and computing approaches make possible the aggregation of millions of customer interval read data.

Utility management and regulators are beginning to see the value of aggregated AMI data for load analysis and learning that current AMI metering investments and supporting MDMS systems are not enough to realize full potential of AMI data. New software, computer resources, and staff with big data analytics skills will be needed.

2. A Little History

AMI systems have been rolling out since early 2000 with a large increase in the number of systems around 2010. The jump in AMI deployment was a result of government incentives paid to encourage smart meter adoption through the 2009 American Recovery and Reinvestment Act (ARRA). In 2009, Evergy (at the time KCP&L) applied and was granted funding for their first smart meter deployment: Evergy installed 14,000 AMI meters as part of the Green Impact Zone¹. Since 2010, there has been a steady increase in AMI adoption and coverage. Evergy reached a 100% AMI coverage beginning in 2020. According to the Energy Information Administration (EIA) U.S. electric utilities had installed roughly 103 million AMI meters by the end of 2020². The *Institute for Electric Innovation* (part of the Edison Foundation) estimates that 75% of households now have AMI meters³. The number of AMI meters is continuing to expand with major projects at Excel Energy, Duke Energy, Tampa Electric, First Energy, American Electric Power, and Puget Sound Energy. By the end of 2021, the Institute for Electric Innovation projects there will be 115 million smart meters in place.

AMI is an integrated system designed to collect interval and daily energy reads at the end-use point (the electric or gas meter) and send this data through the communication network to the utilities Meter Data Management System (MDMS). At the MDMS, daily load reads, and hourly interval data are used in developing customer billing determinants that feed into customer information system (CIS) and billing system. The initial applications were largely focused on reducing customer data collection costs and more accurately measuring customer usage and generate bills (meter to cash).

¹ https://www.efis.psc.mo.gov/mpsc/commoncomponents/viewdocument.asp?DocId=935682078

² https://www.eia.gov/tools/faqs/faq.php?id=108&t=3

³ https://www.edisonfoundation.net/-/media/Files/IEI/publications/IEI_Smart_Meter_Report_April_2021.ashx

Prior to AMI, many utilities including Kansas City Power & Light, an Evergy predecessor company, implemented Automated Meter Read (AMR) systems. AMR systems were primarily designed to replace manual meter reading. In a typical AMR system, a van driving or person walking down the street or a series of pole-mounted collector devices "pings" the meter which in turn returns the meter registry read. This information combined with location, pulse multiplier, and timing of the meter read are then used to generate kWh and kW billing units. Utilities realized significant savings by replacing manual meter reading with AMR. Many utilities today still utilize AMR systems.

AMI opened a whole new world as it allows for two-way meter communication and can collect interval reads (generally 5 minute or 15 minute) as well as daily total and maximum demand reads. The first utilities that implemented AMI never had AMR – their meters were still manually read. This was because AMI system costs were much easier to justify when meter reading cost savings were factored in. Some utilities with legacy AMR systems are still facing headwinds with justifying AMI implementations. States including Massachusetts, Virgina, New Mexico, and Kentucky have rejected utility AMI proposal for not demonstrating project cost-effectiveness⁴. These utilities are refocusing on the value of two-way meter communication in an environment with increasing distributed generation, renewables, and potential impact of electric vehicle charging on the distribution system.

Where the first phase of AMI data use was for developing accurate bills, the second phase of AMI data use has been in applications associated with monitoring load changes at the meter for low voltage, outages, and theft detection. Utilities are also taking advantage of AMI two-way communication where applications include remotely turning on and off meters, controlling end-use loads such as air conditioning, water heaters, implementing voltage-reduction programs, and controlling electric vehicle charging. Other applications include internet-based portals that allow customers to view their daily and hourly load consumption, applications that can disaggregate and present end-use level loads, and customer service applications that allow utility customer service representatives to view customer usage to better address high bill complaints. Evergy is currently using AMI data for:

- Call center high-bill analysis
- Identifying and predicting meter failure
- Theft and fraud detection

⁴ https://www.greentechmedia.com/articles/read/why-most-u-s-utilities-arent-making-the-most-of-their-smart-meters

- Outage and power restoration detection
- Customer load presentation through online portal
- For large Tier 1 customers, the ability to monitor loads across multiple locations

Despite increasing number of applications, a recent ACEEE report (*Leveraging Advanced Metering Infrastructure to Save Energy, Report U2001*⁵) found utilities are underutilizing AMI systems for improving energy efficiency. The study identified where AMI could be used or expanded to improve energy efficiency including implementing TOU rates, providing customer feedback information, pay for performance programs, more robust energy efficiency program evaluation, and grid-interactive efficient buildings.

3. The Third Phase - Load Analysis

The third phase of AMI data applications is relatively recent and is still developing. This phase entails utilizing aggregated AMI data for rate design, cost of service studies, designing and evaluating energy efficiency programs, financial analysis and planning, and forecasting.

Traditionally, load analysis has been the responsibility of load research groups. Load research has been a utility activity that goes back to the early 1940's when the Association of Edison Illuminating Companies (AEIC) formed the first load research committee. In load research, daily and hourly rate class profiles are developed through designing and deploying customer samples, collecting, managing, and validating customer sample hourly load data, and applying statistical-based sample expansion methods. The profile development work is complex and time-consuming requiring strong data processing, sample design, and statistical skills and associated software. While AMI data aggregation has its challenges and requires a different set of skills, once in place, the data aggregation process is significantly less complex, requires less time to generate class load profiles, and is less costly than load research.

What are Utilities doing Now

Itron conducts an annual survey of utility forecasters. In the 2020 survey, Itron asked respondents if they are using AMI data for load analysis. Figure 1 shows survey results.

⁵ https://www.aceee.org/research-report/u2001

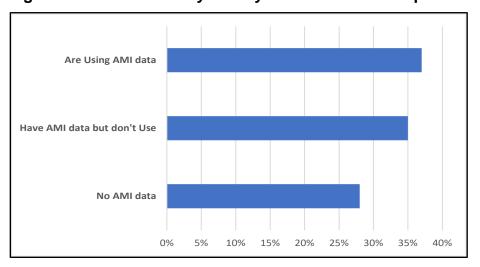


Figure 1: 2020 Itron Utility Survey: AMI Data Use Response

Over 70% respondents reported having AMI systems, but just 37% reported using AMI data for load analysis; representing a little over half of those that had AMI systems in place. While the survey shows that a large share of utilities are still not utilizing AMI data for load analysis, the number of respondents that are utilizing AMI data is up from 23% reported in the 2019 survey. Those utilizing AMI data were further asked about how they were using the data. Figure 2 shows the responses.

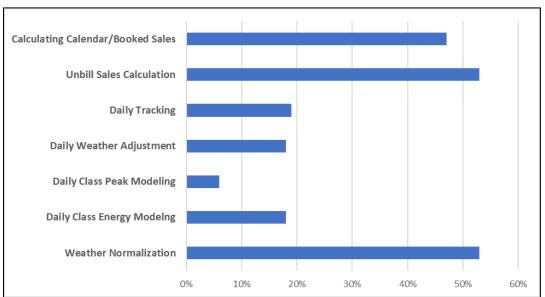


Figure 2: AMI Data Applications

The largest responses are for calculating calendar-month or booked sales, weather normalization, and calculating unbilled sales. Of those utilities using AMI data, nearly

25% are using AMI data for load modeling (daily class energy and daily class peak modeling).

Utility Interviews

As part of the AMI study, we conducted a number of interviews with companies that either had AMI systems in place or are currently implementing systems. The interviews focused on applications of AMI data for load analysis, processes, software used for aggregating AMI data, and issues faced in developing load aggregation capabilities. We interviewed staff from load research, forecasting, and IT groups supporting the AMI aggregation process.

In addition to Evergy, companies interviewed include:

- DTE Energy
- San Diego Gas & Electric
- NV Energy
- CenterPoint Energy
- CPS Energy
- Lakeland Electric
- Burlington Electric Department
- Green Mountain Power
- AES Indiana
- Xcel Energy
- Salt River Project
- TECO Energy

The companies interviewed ranged from companies that are still evaluating and designing AMI roll-up capabilities to companies that are implementing second generation load aggregation schemes in the cloud. The companies are fairly evenly split between three groups:

- Still implementing systems and designing process
- Aggregating data on an "Ad Hoc" basis for analysis requirements
- Aggregating data on a near real-time basis (within two days).

As a point of reference, Evergy falls in the second group.

Reported applications include:

- Weather normalization
- Variance reporting
- Daily budget tracking
- Daily COVID-19 impact tracking
- Cost of service studies and rate design
- Hourly load forecasting
- Unbilled sales calculation
- Behind the meter solar load analysis
- Heat pump program impact analysis
- Targeting energy efficiency programs
- Settlement and load profiling

Evergy is utilizing AMI data for cost of service studies, rate design in all of its jurisdictions, and calculating unbilled sales in the Evergy Kansas Central jurisdiction. Evergy is looking at using AMI data for calculating unbilled sales in all of its jurisdictions.

Complex Process. A common theme across the companies, is that rate-class load data aggregation process is complex and had taken several years to develop. Nearly every company stated that the process was hard. The problem is the MDMS applications are not designed to aggregate interval or even daily load reads. Each company has had to figure out and implement their own process for aggregating interval data (other than Burlington Electric) with applications outside the MDMS. There are no vendors that offer an AMI load aggregation product, and little industry information as to how and what applications can be used for aggregating AMI data.

Evergy's path to load aggregation has been similar to the other companies. Staff from several different groups spent well over a year to develop and implement a process for linking customer information data with AMI data, defining data channels for load aggregation, writing aggregation code, and validating load aggregation, and developing detailed data processing and validation documentation.

The general approach is the utility exports the interval data and daily registry read from the MDMS to a parallel or "shadow" database for load aggregation. Customer information data such as location, rate code, business-type code, and other identifiers are also exported to the shadow database. Database queries are then used to join customer information data with customer interval data and to then aggregate customer interval data over the target identifier such as rate code. The shadow database is

generally updated once a day, in some companies the shadow data base is updated once a month or on a "request basis".

There is some progress to building load aggregation capabilities within the MDMS. Burlington Electric was the one utility that aggregates to rate class within their MDMS. Burlington's MDMS can handle the aggregation process as they are aggregating interval data load for approximately 20,000 customers. SDG&E reported having the capability to aggregate loads with their new MDMS application but had not yet implemented that feature. The latest Itron MDMS (IEE) release now has a module for aggregating AMI data.

Reported database applications used for AMI load aggregation include SAS, Microsoft SQL Server, Oracle SQL, Hadoop, Python, Tableau, Google BigQuery, SAP/Hana, and DataBrick.

Most companies started by aggregating loads using relational database applications including Microsoft SQL Server and Oracle SQL This often turned out to be a problem as aggregation queries would take too long and even fail to complete because of computing capacity constraints. Some companies addressed the problem by adding additional computing capacity, but a number of utilities moved to distributed database management systems (DBMS) with Hadoop being the most popular solution. Distributed database applications spread the data processing across multiple sites significantly increasing processing and calculation speed.

Both DTE and CenterPoint have migrated their aggregation process to cloud-based solutions. DTE started with SAS but is now using Databricks on Azure and CenterPoint went from an SAP/Hana appliance to Google BigQuery. The advantage of these solutions is the aggregation is extremely quick and cloud-based computing capacity is utilized only when its needed. Non cloud-based options are also improving Itron recently added an aggregation module as part of their MDMS (IEE). Oracle which is used by Evergy is improving their roll-up application with their new Oracle Exadata Platform.

What has Worked. The most successful companies had dedicated staff for managing, validating, and aggregating AMI load data. Staff generally had strong database and programming skills. For NVEnergy, the load research department morphed into the load analysis group; NVEnergy no longer does traditional load research work relying entirely on AMI data aggregation to support company analysis requirements. DTE, CenterPoint, and GMP have dedicated AMI analysts. TECo that

has just implemented their AMI system is discussing roll-up options with several vendors. They expect the current load research team to ultimately be responsible for AMI data aggregation for load analysis. Several companies indicated that they are still working to identify the group that should be responsible for supporting AMI load analysis.

What Hasn't Worked. What hasn't worked well is where there is no person or group responsible for load aggregation. At one utility, analyst groups had to do their own queries, data validation, and profile adjustments; often the profiles developed by one group didn't look like the profiles developed by another group even though they were pulling from the same data source. At another utility miscommunication between the analysis group and IT group that was executing the data roll-up resulted in aggregated rate class loads that were clearly wrong.

The initial reason for rolling-up AMI data varied by company. For GMP, the initial use of aggregated load data was to build out a daily tracker that allowed management to assess forecast performance and later to track COVID-19 impacts. For SDG&E the driving factor was the need to support load settlement for Community Choice Aggregation program. For NV Energy it was to support designing behind-the-meter solar cost of service and standby rates. For Lakeland Electric aggregated AMI data was utilized to track COVID-19 by business activity.

These and other utilities with established roll-up processes are expanding their use of AMI data. Companies are using AMI data for variance analysis, estimating unbilled sales, weather normalization, rate making, and developing calendar month or booked sales and revenue forecasts. For DTE, nearly all rate design, cost of service and financial analysis and reporting is now based on AMI aggregated data.

4. Benefits of AMI

Load research based hourly and daily use rate-class profiles have long been the backbone of utility analytics. Evergy, like most utilities, has had a load research department dedicated to developing and maintaining rate class hourly loads. Utilities has been utilizing statistical methods to develop rate class profiles from customer samples that meet industry-established confidence levels. While load research has served utilities well, AMI aggregation has the potential to provide even higher level of accuracy across all hours as AMI aggregation is measured (though still needs adjustment for the small amount of load that does not flow through AMI meters) vs load research based profiles that are statistical estimates. The benefits of AMI roll-up capabilities are outlined below:

Cost Savings. Once built out, the AMI aggregation process should be less costly than maintaining a load research program. AMI aggregation will require fewer staff with specialized statistical skills and free-up staff for more analysis and less data validation and processing work. Where it often takes several months to process and construct hourly loads through load research, AMI roll-up applications can generate class-level hourly loads within days. The build out process would require some of what has been mentioned throughout this report including, dedicated and specialized staff, hardware, software, and significant computing resources.

Unbilled Sales Estimation. For most utilities customer's meters are read across the month, even where AMI systems are in place. For customers whose meters are "read" at the beginning of the month, most of their usage falls in the prior month where most of the usage for customers read at the end-of the month fall within the same calendar month. As a result, billed sales for any given month generally includes half the sales in the current month and half the sales of the prior month. Given meter read timing, it's not unusual to see billed sales that include not only last month's usage but even usage two-months prior. Financial revenues and operating costs are reported on a calendar month; this requires untangling the monthly billed sales across months and estimating the portion of sales delivered but not yet billed (unbilled sales). Most utilities use an accounting approach to estimate the unbilled sales and revenues. The accounting approach can result in large over and under estimation of unbilled sales and revenues. While the process ultimately corrects over time, management and shareholders are not always getting the most accurate picture of current revenues and resulting margins. AMI data can significantly improve unbilled and calendar-month sales and revenue estimates; Unbilled and calendar-month sales no longer have to be estimated but can be calculated. The mystery often associated with large unbilled sales variance simply goes away and in turn provides more clarity on utility revenue and profitability for management, shareholders, and regulators.

Cost of Service Studies and Rate Design. Replacing load research with AMI load aggregation will overall provide a more accurate measurement of rate class hourly loads and as a result improved cost allocation when compared with statistical-based load profiles. While we can build strong sample-based profiles, sample-based profiles will never be as accurate as the aggregation of the actual load data. This is particularly true for commercial rate classes, where a sample cannot totally capture the wide variation in customer load use. Similarly rate design based on AMI data provides that much more confidence that the data used in constructing new rates and modifying existing rates is accurate; a stronger foundation for rate calculations reduces the risk of revenue shortfalls.

Weather normalization. Weather normalization is a core utility activity. Isolating weather allows us to see rate class sales trends, track forecast performance, and calculate the basis for test-year sales and revenue. Weather normalization models based on measured customer use will be that much more accurate than models based on statistical-based load estimates.

Variance analysis. Variance analysis utilizes results from weather normalization to track sales against the budget forecast and to identify deviations from budget that may require addressing. Improvements in the weather-sales estimates (from weather normalization) will lead to more accurate tracking of the sales and revenue forecast. AMI data further allows for daily tracking; this can be used to gauge where sales will likely be by the end of the month or quarter. AMI data provides greater clarity on sales trends and expected near-term sales and revenue.

Forecasting. AMI load aggregation provides a more accurate measure of current month sales use and as a result improved sales, revenue, and long-term energy demand forecasts. Customer sales forecasts are generally based on historical monthly billed sales. Billed sales can vary significantly over the estimation period not only because of weather but also because of billing adjustments and variation in the number of meter-read days. Modeling billed sales is complex and further requires additional simulations to translate billed sales forecast to a calendar-month forecast required by Finance and Resource Planning. Models estimated directly from measured calendar month sales will have smaller variance and as a result an improved confidence interval around the forecast.

5. Evergy's Transition to AMI for Load Analysis

Evergy began the transition from load research to total AMI load aggregation after completing systemwide AMI deployment in 2020. Evergy established a transition team that included staff from IT, accounting, regulatory affairs, forecasting, and customer analytics. This team has been responsible for documenting the process, building out the aggregation application, validating results, and building the use-case for AMI data. Evergy's current plan is to utilize AMI data for supporting cost of service, rate design, and weather normalization. New AMI applications will require additional development work and computer/software resources for automating the roll-up process and improving processing speed.

As part of the implementation, the transition team documented the AMI data aggregation and validation process. The document has been updated several times to reflect issues that were discovered and corrected as part of the aggregation process. Evergy expects the process document to continue to evolve as new methods are implemented and data issues are addressed. The latest update was completed in October 2021. Itron reviewed this document as part of the Study. The process is described below:

Build Initial Rate Class Profiles. Data flows from the AMI collection system into the MDM. Data validation algorithms within the MDM are used to ensure the quality of the data for billing purposes. The aggregation process entails firsts exporting data to a shadow database that's called the Data Hub. The Data Hub is an Oracle relational database application. Customer attribute data (such as location and rate code) are also imported into the Data Hub and joined with customer interval data through a common identifier variable. Rate class hourly load profiles are then generated by executing a set of maintained queries that aggregate the interval data across customers and rate codes.

Validate Rate Class Loads Against Daily Registry. The initial validation compares the sum of the hourly loads against the sum of the daily registry kWh; the daily registry is what is used for billing customers and is validated in the MDM. Any significant deviation is flagged and investigated. The collection process minimizes investigation requirements as the AMI collection system will repeat interrogation of the meters over several days to collect any initial missing intervals. Interval data updates in the MDM are exported to the Data Hub. The process also monitors the row count between the MDM and Data Hub to ensure that the Data Hub includes all the collected interval and daily scalar (registry) data.

Scale to Total Number of Customers. Rate class profiles are adjusted to account for the small number of customers with missing interval data. By the end of the test-year period only 0.1% of customers were missing data. A scaling factor is generated by dividing the total number of customers by the number of interval meter customers. The scaling factor is then applied to the initial class hourly load estimate.

Validate Rate Class Loads Against System Load. Rate class hourly loads are aggregated to generate total system-delivered loads. Delivered loads are compared against system loads. Differences between system and delivered loads are line losses. Line losses are compared against expected line losses based on the Companies line loss study. Any significant deviation from line losses is investigated.

Validate AMI Loads Against Billed Sales. AMI derived monthly sales are compared against billed sales. While differences in timing between the billing-month period and calendar month makes monthly comparisons difficult. On an annual basis, sales should be close. Any significant differences are investigated.

Evergy has made a significant effort to build out the AMI data aggregation application, incorporate data checks, and validate resulting rate class hourly loads. The process is well documented and should generate accurate rate class hourly load profiles.

6. Use of AMI Data Aggregation for Current Rate Cases

Evergy plans to file rate cases in Missouri and Kansas. For the first time, Evergy will use aggregated AMI-based rate class loads to replace sample-based rate class loads for cost of service, rate design, and weather normalization as well as an adjustment for COVID load impact. To evaluate the effectiveness of this transition, 2020 AMI generated, rate class profiles were compared against load research profiles. Figure 3 compares residential daily use per customer for the Evergy Missouri West operating (EMW) service area. The AMI profile is blue, and the load research profile is red.

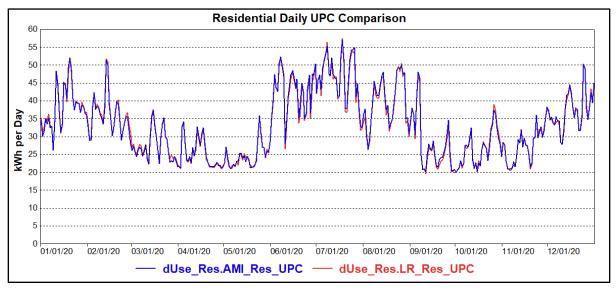


Figure 3: EMW Residential AMI Vs Load Research

The load research profile is based on interval data derived from 263 sample customers that are equally split between electric heat and non-electric heat customers.

Differences in estimated daily use and total annual use are relatively small. Table 1 compares AMI aggregated residential sales with load research sales estimate. AMI data shows average use of 12,213 kWh against 12,165 kWh for load research.

Table 1: EMW Residential Sales Comparison

2020					
	AMI	Load Research	Difference	Pct	
Sales (MWh)	3,530,738	3,516,716	14,022	0.4%	
Average Use (kWh)	12,213.0	12,164.5	48.5		

On a total sales basis, differences in AMI and load research based sales estimate is just 0.4%; while this shows accurate load profiles can be developed from load research (at least in the residential sector), statistical based profiles are significantly more complex in construction.

As class peak contributions are key parameters in allocating costs, we also compared class hourly loads. Figure 4 compares EMW residential hourly loads for July.

Figure 4: EMW Residential July Hourly Loads

Differences in AMI and load-research based profiles are relatively small. We can estimate fairly accurate residential profiles with load research samples as residential customers use electricity for the same end-uses and across similar hours.

The larger improvements gained from AMI data are in the commercial and industrial (C&I) rate classes. Given business diversity and associated loads, statistical precision under load research is generally lower than residential; this is true even when the sample is relatively large; the load variance in C&I rate classes is just generally larger than residential rate classes. Figure 5 compares the EMW large general service (LGS) AMI loads with the load research profile. The load research profile is based on 160 sample customers representing over 10% of total LGS customers.

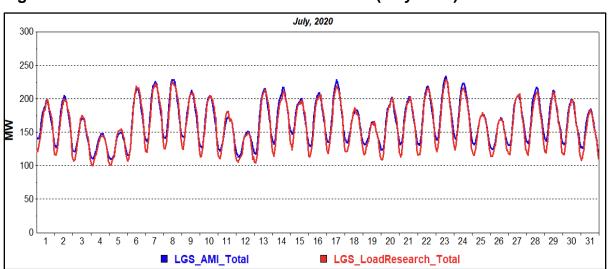


Figure 5: EMW 2020 LGS AMI vs. Load Research (July 2020)

The difference between LGS aggregated loads and load research profile is more visible than that in the residential class. The LGS load research profile tends to underestimate both minimum and peak hour loads when compared with the AMI data.

Improved accuracy from AMI data is more evident in the small general service (SGS) rate class in the Evergy Missouri Metro service area (EMM). Figure 6 compares AMI and load research July hourly loads.

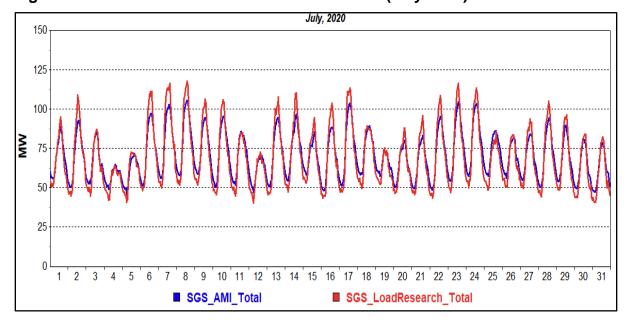


Figure 6: EMM 2020 SGS AMI vs. Load Research (July 2020)

For this class, the load research profiles over-estimate peaks and underestimate minimum load hours when compared with AMI aggregated loads.

7. Summary

There has been a significant shift within the utility industry from load research to towards AMI load aggregation for load analysis. This transition will contribute to improved rate class hourly and daily load measurement supporting utility analysis including forecasting, ratemaking, financial analysis, and resource planning.

Evergy has also been making this transition. First by utilizing AMI data in their load research load estimation process and now by transitioning to 100% AMI load data aggregation. Evergy has built a well thought-out process and application for aggregating customer interval loads to use in weather normalization to support the 2022 rate case. This process compares well to AMI aggregation processes developed by other utilities. Customer information data is merged with customer interval data with multiple checks on the process to guarantee data are mapped to the correct customer and rate schedule. Aggregated rate class loads are verified against the daily registry which is used for billing and also compared with billed sales and system load. Evergy has an assigned project team that meets regularly to review load aggregation results, address any issues, and explores new AMI data applications and methods for aggregating AMI data.

Comparisons of AMI load profiles with load research based load profiles shows improved load measurement in the commercial sector where there is a greater diversity of customer use when compared with the residential class. In the residential rate class, there is insignificant differences in load profiles derived from load research vs. AMI load aggregation. The load comparisons show that Evergy's load research program has generated reasonable load profiles for applications in cost of service, rate design, weather normalization, and estimating unbilled sales.

Across the industry, the transition to AMI for load analysis has not been easy, in the long-run, utilities will see cost savings as the load research function is replaced with load aggregation algorithms. AMI load aggregation is significantly less complex than developing statistical-based load profiles, and results in more accurate rate class hourly loads. AMI is measured data; load research based profiles are statistical estimates.

Improvements in traditional database applications such as Oracle SQL and Microsoft SQL and new distributed database applications such as Hadoop and cloud base aggregation software such as Google BigQuery will allow for faster load aggregation and reduced computing costs. Also, future MDMS upgrades will incorporate roll-up capabilities. Several utilities have taken advantage of software development and are generating near real-time rate class hourly loads. This in turn has opened up new applications to support financial closing, track forecast performance, gain clarity on near-term usage trends, and evaluate direct load control program impacts. However, software, computer processing, and staff with expertise with these new applications will require additional and on-going utility investments since unleashing AMI capability is not something that comes automatically with just the installation of AMI Meters.

Evergy's AMI load aggregation process benchmarks well with methods developed by other utilities with AMI systems. Like nearly all utilities, Evergy has independently developed their application and validation process using available software and had to address similar issues raised by the utilities we interviewed. This includes identifying the right data channels, mapping load data to customers, building validation processes, addressing computer resource constraints, and scaling to capture non-AMI meters. Evergy is well-positioned to utilize aggregated AMI data for cost of service studies and rate case weather estimates and is making progress toward leveraging AMI data for additional use cases in the future.

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Rate Design Case of Evergy Metro, Inc. d/b/a Evergy Missouri Metro))	No. EO-2021-0349
In the Matter of the Rate Design Case of Evergy Missouri West, Inc. d/b/a Evergy Missouri West))	No. EO-2021-0350

EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST TIME OF USE RATE DESIGN REPORT

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("Evergy Missouri Metro") and Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West") (collectively, the "Company" or "Evergy") and files this *Time of Use (TOU) Rate Design Report* ("Report") with the Missouri Public Service Commission ("Commission") and, in support of the filing, states as follows:

I. <u>INTRODUCTION</u>

Background

- 1. On September 25, 2018, Evergy Missouri Metro¹ filed a *Non-Unanimous Partial Stipulation and Agreement Concerning Rate Design Issues* in Case No. ER-2018-0145 ("0145 Stipulation"), which was approved by the Commission's *Order Approving Stipulations and Agreements* on October 31, 2018 ("0145 Order").
 - 2. As part of the 0145 Stipulation, Evergy Missouri Metro agreed to:

By June 30, 2020, KCP&L will file a rate design case limited to TOU issues. For GMO, signatories further agree the September 20, 2016 Non-Unanimous Stipulation and Agreement in ER-2016-0156

¹ Effective October 7, 2019, Evergy Missouri Metro adopted the service territory and tariffs of Kansas City Power & Light Company ("KCP&L").

will be expanded to include TOU, with the TOU rate design case to commence by June 30, 2020.

- 3. On June 15, 2020, Evergy Missouri Metro filed a *Motion for Extension of Time* ("Motion") seeking addition time, until June 15, 2021, to file the rate design case detailed above.²
- 4. On June 29, 2020, the Commission issued its *Order Granting Motion for Extension of Time*.

II. RATE DESIGN

5. Attached hereto as **Exhibit A** is the Report of Evergy Missouri Metro's and Evergy Missouri West. The Report confirms the reasonableness of the Company's TOU program that the Company began offering to customers on October 1, 2019. The Report describes in detail how the Company met all Stipulation commitments, as well as, presents a desire to offer an additional 2-period TOU rate to expand the Company's TOU rate options at Evergy in its next general rate case. The Report shares slight modifications to the current 3-period TOU rate offering that the Company will seek approval in its next general rate case. The Report communicates this TOU expansion, refinements, and important elements of the Company's Rate Modernization Plan. The cases are presented in a Report format, providing support for the Company's conclusions.

III. REQUEST FOR COMMISSION GUIDANCE

6. The Company shared a summary of its TOU Rate Design Plan contained in Exhibit A with Staff ("Staff") for the Commission and the Office of the Public Counsel ("OPC") on March 3, 2021 and made adjustments to that plan where possible in response to their feedback. The

² "The Company seeks additional time to file a rate design case so that the case is supported by 12 months of Time of Use "(TOU") information inclusive of the summer season. Staff for the Commission ("Staff") has requested, and the Company agrees, that it will include the TOU data in its rate design case and share that information with stakeholders. That data will include hourly Advanced Metering Infrastructure ("AMI") information for the TOU participants and their control group, as well as, any other data used in the evaluation of the rate and used in the Evaluation Measurement & Verification ("EM&V"). See, *Motion*, ¶3, pp. 3-4.

Company hopes that this docket will enable discussion and provide further understanding of

stakeholder positions on the latest TOU proposals, as well as, result in Commission guidance

concerning how TOU rates could be proposed in the Company's 2022 rate case filings.

IV. PROPOSED PROCEDURAL SCHEDULE

7. In adherence with Fuel Adjustment Clause ("FAC") requirements mandating a

general rate case proceeding every four years, it is expected that the Company will make a general

rate case filing sometime in 2022. The Company would like to include expected TOU stakeholder

feedback and Commission TOU guidance in the general rate cases. The Company proposes the

following procedural schedule.

Report filing (June 15, 2021)

■ Workshop meeting (July 15, 2021)

Response from parties (August 15, 2021)

Commissioner questions and comments (September 2021)

WHEREFORE, Evergy Missouri Metro and Evergy Missouri West respectfully submit

this information for consideration by the Commission.

Respectfully submitted,

s Roger W. Steiner

Roger W. Steiner, MBN 39586

Evergy, Inc.

1200 Main Street

Kansas City, MO 64105

Phone: (816) 556-2791

roger.steiner@evergy.com

Attorneys for Evergy Missouri Metro and Evergy

Missouri West

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, postage prepaid, to the Staff of the Commission and to the Office of the Public Counsel this $15^{\rm h}$ day of June 2021.

|s| Roger W. Steiner

Attorney for Evergy Missouri Metro and Evergy Missouri West

VERIFICATION

COUNTY OF JACKSON)	
)	SS
STATE OF MISSOURI)	

I, Darrin R. Ives, state that I am Vice President of Regulatory Affairs for Evergy Missouri West, that I have reviewed the foregoing pleading, that I am familiar with its contents, that the statements contained therein are true and correct to the best of my knowledge and belief, and that Evergy Missouri West has had no communication with the Office of the Commission within the prior 150 days regarding any substantive issues likely to arise in this case.

Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.³

Evergy, Inc.

Darrin R. Ives, Declarant

³ See Letter from the Commission, dated March 24, 2020: "[A]ny person may file an affidavit in any matter before the Commission without being notarized so long as the affidavit contains the following declaration: [']Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.[']

Signature of Declarant[.] This guidance applies both to pleadings filed in cases before the Commission and to required annual reports and statements of income."



Evergy Missouri Metro & Evergy Missouri West

Time of Use Rate (TOU) Rate Design Case Report

June 15, 2021

Contents

1 EXE	ECUTIVE SUMMARY	4
2 HIS	TORY OF REGULATORY ORDERS PERTAINING TO TIME OF USE	9
2.1 Ba	ackground of S&A and MPSC Orders	Q
2.1 00	sengiound of our and in oo orders	
2.2 Ac	dherence to Rate Design and Class Revenue Stipulation and Agreements	13
3 EVE	ERGY'S RATE MODERNIZATION PLAN OVERVIEW	14
4 SUC	CCESS OF EVERGY'S TOU RATE	16
4.1 Cı	ustomer Research Plan	16
4.2 In	-Person Focus Groups	17
4.3 Er	nrollment Surveys	19
4.4 Ur	n-enrollment Surveys	19
4.5 Be	ehavior Surveys	20
4.6 Ec	lucation Tools	21
4.6.1	Pre-Enrollment Education Tools	21
4.6.2	Post-Enrollment Education Tools	22
4.7 Ma	arketing Outreach and Education Plan	
4.7.1	Messaging	
4.7.2	Creative	
4.7.3	Pre-Enrollment Tools	
4.7.4	Post-Enrollment Tools	
4.7.5	Outreach Tactics	26
4.8 Im	plementation	
4.8.1	Phase 1: Employees	
4.8.2	Phase 2: Early Adopters	
4.8.3	Phase 3: Mass Awareness	
4.8.4	Phase 4: Enrollment	28
4.9 Ev	valuation. Measurement and Verification (EM&V) Plan	28

5	TOU F	RATE DESIGN PLAN	30
5.1	Indu	stry Research & Best Practices	30
5.	1.1	Best Practices in TOU Design	30
5.	1.2	TOU Deployment Strategy, Opt-In vs Opt-Out	30
5.2	Cust	omer Research	33
5.3	Strat	egic Intent	34
5.4	TOU	Rate Design Analysis	38
5.	4.1	TOU Season Analysis	39
5.	4.2	TOU Time Period Analysis	45
	5.4.2.1	System Load Analysis	46
	5.4.2.2	SPP Energy Market Pricing Analysis	51
	5.4.2.3	Residential Class Load Analysis	52
	5.4.2.4	System Cost Analysis	56
	5.4.2.5	TOU Time Period Future Proofing Considerations	58
5.	4.3	TOU Price Differential Analysis	59
	5.4.3.1	3-Period Price Differential	60
	5.4.3.2	2-Period Price Differential	61
5.5	•	osed Residential TOU Rates	
5.	5.1	3-Period TOU Rate	62
	5.5.1.1	Season Definition	63
	5.5.1.2	TOU Time Periods	63
	5.5.1.3	TOU Price Differentials	
	5.5.1.4	Extreme Weather Considerations	64
5.	5.2	2-Period TOU Rate	65
	5.5.2.1	TOU-2 Season Definition	65
	5.5.2.2	TOU-2 Time Periods	66
	5.5.2.3	TOU-2 Price Differentials	66
5.6	Educ	cation Plans	66
6	APPE	NDIX A – INTERIM EM&V RESULTS	68
7	APPE	NDIX B - FUTURE RATE OPTIONS	73
8	APPE	NDIX C - TOU EDUCATION TOOLS	75
9	APPF	NDIX D- FXFMPI AR TARIFFS	77

1 EXECUTIVE SUMMARY

The Company's filing and report are organized as follows:

Section 1 – Executive Summary (Witness: Kim Winslow)

Section 2 – History of Regulatory Orders Pertaining to Time of Use (Witness: Brad Lutz)

Section 3 – Overview of Evergy's Rate Modernizaton Plan (Witness: Brad Lutz)

Section 4 – Success of Evergy's TOU Rate (Witness: Brian File)

Section 5 – TOU Rate Design Plan (Witness: Ed Hedges)

Appendix A - Interim EM&V Key Findings

Appendix B – Future Rate Options

Appendix C - TOU Education Tools

Appendix D – Exemplar Rate Tariffs

This "Time of Use Rate Rate Design Case Report" ("Report") defines the Company's plans to further deploy Time of Use ("TOU") rate designs for its residential customers in its Missouri utility jurisdictions, specifically Evergy Missouri Metro and Evergy Missouri West (collectively, the "Company"). This Report fullfills commitments made by the Company in the Non-Unanimous Partial Stipulation and Agreement Concerning Rate Design Issues in Case No. ER-2018-0145 and Case No. ER-2018-0146 ("0145 Stipulation") to "file a rate design case limited to TOU issues. For GMO, signatories further agree the September 20, 2016 Non-Unanimous Stipulation and Agreement in ER-2016-0156 will be expanded to include TOU, with the TOU rate design case to commence by June 30, 2020." The 2016 GMO rate design case commitment was filed on June 30, 2020. On June 15, 2020, the Company filed a request for an extension of the Time of Use Rate Design Case referred to in Case No. ER-2018-0145, Section 2.i.. On June 29, 2020, the Commission granted the Company's request for extension and ordered the Company to file a TOU Rate Design Case by June 15, 2021. This Report fulfills that requirement. Further the Company intends that this Report and 0145 Stipulation will enable discussion and provide further understanding of stakeholder positions on the latest TOU proposals, as well as, result in Commission guidance concerning how TOU rates could be proposed in the Company's 2022 rate case filings.

¹ The Company anticipates the TOU plans discussed herein will be applicable to all of the Evergy jurisdictions as rate cases are filed; therefore there are references to Evergy Kansas Metro and Evergy Kansas Central jurisdictions.

Starting immediately after the rate cases in 2018, the Company began executing on its commitments and successfully launched the 3-period, opt-in TOU rate for its residential customers on October 1, 2019 as agreed upon in the 0145 Stipulation. The 0145 Stipulation identified a number of steps to guide the deployment. The guidance covered:

- Details to define the TOU rate design
- Develop a comprehensive customer research, education and marketing plan
- Evaluate leading practices on customer education and engagement on TOU deployment
- Develop a process to solicit feedback from customers
- Metrics to gauge changes in customer behavior
- Various opportunities for stakeholder engagement and update

To achieve this, Evergy formed a cross-functional project team of over 80 subject matter experts from almost every area of the Company and began the year-long initiative to research, develop and implement a cohesive TOU solution. The solution was built on a customer research plan that leveraged qualitative and quantitative customer feedback to inform critical product, marketing and customer education decisions. For implementation, the Company built momentum for the introduction of the new TOU plan by connecting with "Innovators and Early Adopters", key demographic groups known to seek out new approaches, to ignite early awareness, enrollment and advocacy, moving the effort in a positive direction as greater awareness was built within the larger customer base.

Evergy continued to execute on its plans following the October 1, 2019 roll-out and deems that the deployment has been successful, particularly if measured against the initial goals, but also with respect to customer satisfaction. Within the 0145 Stipulation, each jurisdiction had a goal of reaching 1,750 customers by December 31, 2020. Those goals were surpassed. As of June 11, 2021, Evergy exceeds the enrollment target with a total of 5,538 active enrollments (2,917 enrollments in Missouri West and 2,621 enrollments in Missouri Metro). This equates to about 160% of the stipulated goal.

Additionally, Evergy retained Guidehouse Inc. ("Guidehouse"), to support the efforts to study residential TOU rates and provide independent evaluation services to verify the ex-post (historical) impacts of the TOU rates through an Evaluation, Measurement and Verification ("EM&V"). The results of the interim EM&V presented to stakeholders on December 17, 2020 included:

- Results indicate that the TOU rate and associated program design has had the desired
 effect of reducing consumption during the on-peak period (4-8 pm M-F) in both the
 summer and non-summer seasons and driving participant bill savings (on average).
- Peak System Impacts TOU participants lowered their demand by 4-9% at system coincidence peak.

- Bill Impacts On average, participants are saving annually. Summer bills see the
 greatest savings, approximately half of which are driven by behavioral changes while
 non-summer bills see an increase for those previously on the electric heating rate
 primarily driven by rate structure changes.
- Annual savings for residential general customer ranges from 5 to 10%.
- Annual savings for residential space heating customer ranges from 3 to 6%.
- Enrollments the Company had exceeded stipulated enrollment targets within the evaluation year, which at the time was 142% of the overall Missouri enrollment target of 3,750 customers.
- Attrition Approximately 50% of attrition (700 customers) that occurred during the evaluation year was from customers moving.

The Company will submit a final EM&V of the initial TOU deployment by December 31, 2021.

Moving forward, the Company anticipates a general rate case filing in early 2022. As a step in its preparedness, the Company developed a Rate Modernization Plan ("Rate Plan"). The Rate Plan is intended to guide the Company on several identified rate objectives over a period of time. The Rate Plan provides a framework for Evergy that is both responsive to its historical regulatory obligations in Missouri and Kansas, but also provides a framework for updating the Company's rate plans and to guide future general rate case filings. Continuing to offer opt-in TOU rate(s) is an important element of the Rate Plan. As part of its overall Rate Plan, the Company is considering expanding its residential rate portfolio to include to include a Low Income Community Solar Subscription rate, Subscription Pricing rates, and Prepay options, as well as a 2-period TOU rate option to complement the existing 3-period TOU rate option.

In addition to the Rate Plan, the Company conducted various internal studies and reviews to inform its TOU rate designs, information that will be used to enhance rates proposed in its 2022 Missouri rate cases. As an initial step, the Company reviewed industry best practices and benchmarked several types of residential rate offerings, including TOU, Subscription Pricing, and other Time Variant rates, as well as a Prepay programs. Evergy retained the services of the Brattle Group to assist with this effort. Led by Dr. Ahmad Faruqui and Ryan Hledick, Brattle's benchmarking efforts provided comprehensive information and detail concerning TOU rate design applied across the industry, including a view of international efforts. The analysis identified a few key points to inform Company plans, which include:

- Despite widespread availability across most states, enrollment in TOU rates is still very low nation-wide. Only a few utilities have substantial (i.e., >10%) participation in TOU rates.
- Analysis of dozens of TOU pilot programs worldwide indicate that customers do respond
 by shifting consumption and reducing peak demand. The design choice that most affects
 the impacts of TOU rates is the ratio of peak to off-peak prices, with stronger price
 signals yielding higher peak load reductions.

- Most TOU rates are offered on an opt-in basis, but a few are opt-out (default). Opt-out rates have higher enrollment rates relative to opt-in rates (e.g., 80% enrollment for optout versus 20% enrollment for opt-in), though opt-out offerings achieve lower impacts per participant.
- TOU rates can also be combined with other rate structures with stronger price signals
 during the most critical hours. The effect of these programs is increased by enabling
 technologies which help to inform customers of prices and automate customer response.

Evergy has a long history of listening to our customers and working to best understand what they want concerning energy and believes that approaches taken for a TOU rate should reflect customer preference in order to maximize results and customer engagement. The Company engaged with customers in numerous ways to understand their opinions. One common theme emerged in the results from these studies and that is the ongoing desire for customers to enjoy a choice of rates.

Customer input, industry perspective, learning from our experiences and data analytics create an important foundational perspective. The Company seeks to build on its success and offer an expanded portfolio of rate designs to engage customers and support our strategic direction. These inputs informed our planning and formation of principals to guide the planning of the next phase of TOU deployment.

Turning to analysis, Evergy examined the seasonal periods, time periods and price differentials to assess the current 3-period, opt-in TOU offer. For seasonal periods, daily peak loads and market day-ahead average daily energy price profiles support that peak loads occur in the four months of June, July, August, and September. For time periods, consideration was given to the actual seasonal and daily fluctuation in system and customer class loads along with the wholesale costs of energy to develop the optimum time periods for a residential TOU rate. Most analysis of historical data supports a 4-hour, Summer On-Peak period from 3-7 pm, which is slightly misaligned with the residential class 4-hour peak load period and Evergy's current TOU On-Peak period from 4-8 pm. Based on a desire to maintain consistency with the current TOU rate design and "future proof" the time period for the future anticipated impact of increased solar penetration and customer behavioral load shifts, Evergy determined to continue with the On-Peak period of 4-8 pm. For pricing, residential class's share of costs (generation, transmission, distribution and energy) from the Company's most recent class cost of service studies were allocated to the TOU time periods analysis to determine the target price differential for each time period by season. This analysis supports a rate design wilth a strong summer peak price and a significantly discounted super-off-peak price, with modest price differences in the other periods.

For its TOU Rate Design Plan, Evergy will seek approval of two primary proposals that will build on the success of its intial TOU rate design. First, we propose to to refine existing 3-period TOU rate design. This refinement will include:

- Align summer seasons to June 1-September 30
- Maintain the On-Peak period from 4 pm-8 pm
- Maintain summer pricing differentials, but reduce the non-summer price differentials to better reflect cost
- Continue to leverage market research to explore broadening customer education and marketing to achieve greater participation

Second, we propose to add a new optional 2-period TOU rate design. This option is designed to be attractive to customers with less ability to shift usage throughout the year and help address bill impact of TOU typically occurring for space heating customers. This new 2-period TOU rate will include:

- Summer On-Peak and Off-Peak periods with the On-Peak pricing aligned with the 3period rate
- Non-Summer Off-Peak and Super Off-Peak periods with the Super Off-Peak period aligned with the 3-period rate

In addition to these rate design changes, the TOU Rate Design Plan includes ongoing plans for customer education. The benefit of customer education was clearly established in the Company review of the initial TOU rate. Evergy will continue an integrated education and outreach campaign to help increase customer awareness of all rate plan offerings, especially the TOU rate. This integrated strategy will focus on simplification, consistency, customer understanding and outreach. Evergy intends to deliver clear, concise and personalized, data-driven education, leveraging critical technology and infrastructure. Consistency will be reinforced through a centralized message on our website where customers can easily access additional information and education. It is expected these messages will help customers understand the important impacts of the TOU Rate Plan beyond saving money, particularly the community and grid benefits of the rate. Finally, the Company expects to connect with new customer segments under this plan. By using integrated mix of channels, such as social media, email and other digital forms, the Company expects to deploy messages that resonate with new and existing customers.

It is our intention that this Report and this docket will enable discussion and provide further understanding of stakeholder positions on the TOU proposals presented in this Report, as well as result in Commission guidance concerning how TOU rates could be proposed in the Company's 2022 rate case filings.

2 HISTORY OF REGULATORY ORDERS PERTAINING TO TIME OF USE

The following sections describe the history of Missouri Public Service Commission ("MPSC") regulatory orders pertaining to TOU and the Company's efforts to fulfill the agreements.

2.1 BACKGROUND OF S&A AND MPSC ORDERS

On September 25, 2018, parties to Dockets ER-2018-0145 and ER-2018-0146 entered into a non-unanimous partial stipulation and agreement concerning rate design issues ("Rate Design S&A").² Section 2 of the Rate Design S&A details agreements among the signatories on issues related to TOU rates. In addition, Section 6 of the Rate Design S&A notes that the Company's two-part TOU tariffs will continue and will not be available to new customers. The details of Section 2³ are as follows:

- "2. a. The Signatories believe this Rate Design Stipulation defines a meaningful and successful process to establish alternative rate plans in the form of Time of Use ("TOU") rates for residential customers following accepted best practice and ensuring measured impact to customers within the class. The Company believes TOU rates should be part of a broad selection of rates offered to Customers and utilized to help the Company provide an opportunity to Customers to shift demands from peak periods and benefit from that shifting load. Further, TOU rates allow the Company and Customers to extract additional benefit from recent upgrades in metering and billing systems.
 - b. Effective October 1, 2019, KCP&L and GMO will offer a residential Time of Use Service, originally proposed as a pilot by the Company in this case, as an opt-in rate that would be available as an alternative to standard residential rates, which shall continue to be available.
 - i. The TOU opt-in rate will remain in effect until changed by Commission order.
 - ii. Customers who take service under the TOU opt-in rate and switch back to a standard rate will be required to wait 12 months before they will be eligible to re-enroll in the TOU opt-in rate.
 - c. The Company will develop a comprehensive customer research, education and marketing plan and identify the Company readiness and outreach capabilities and resources required to introduce the TOU rate plan to residential customers.
 - i. By the end of Q4 2018, the Company will meet with Staff, OPC, DE and Renew MO (stakeholders) to review the customer research plan.
 - ii. By the end of Q1 2019, the Company will launch the customer research plan.

² Refer to Order Approving Stipulations and Agreements, dated October 31, 2018.

³ Ibid

- iii. The Company will evaluate leading practices on customer education and engagement on TOU deployment. During Q2 2019, the Company will develop a marketing and education plan and will meet with stakeholders to review.
 - The Company will develop a plan that may include various forms of tools, marketing, and customer education such as mailings, outbound calling, text messaging, website information, media outlets and outreach through various company partners including community action agencies, senior housing centers and others.
 - 2. The plan will include marketing to specific end-uses that might benefit from the TOU rate plan, such as Electric Vehicle charging and space conditioning.
 - 3. The Company will address the potential impact to the customer contact center and training that will ensue to properly address customer questions. The Company will provide all call center personnel with effective and sufficient training and education on their TOU offering. Company shall evaluate opportunities to educate new customers requesting service on the availability of a TOU as well as other educational opportunities when existing customers call the contact center for other matters, including TOU education through an Interactive Voice Recognition ("IVR").
 - The plan will address how to approach vulnerable customer segments, such as low-income customers, elderly customers and customers with electricitydependent medical needs.
 - 5. Education on the merits of the TOU opt-in rate plan, both specific to the customers taking service thereunder as well as to customers at large, will continue throughout the offering of the TOU opt-in rate plan.
 - 6. The Company will work with stakeholders to operationalize the customer journey from first learning about the TOU rates, to enrolling/un-enrolling, receiving the first bill and managing their energy usage going forward
- iv. The Company will develop a process to solicit feedback from customers availing themselves of the TOU rate and those who do not avail themselves of such rate to determine program success and opportunities for improvement. This is referred to as "Customer Feedback Mechanism"
 - 1. End of Q4 2018, discuss with stakeholder options for Customer Feedback Mechanism". This process shall be developed with stakeholder input. The Company will keep customer documentation and records on all customer feedback to the degree possible regarding its post-implementation of TOU in a format that can be shared with stakeholders upon request.
 - 2. End of Q2 2019, finalize draft of Customer Feedback Mechanism and share with stakeholders.
 - 3. End of Q4 2019, finalize Customer Feedback Mechanism and plans for implementing the mechanism, and share with stakeholders.

- v. The Company will develop, with stakeholder input, metrics to gauge changes in customer behavior. This is referred to as "Customer Behavior Metrics."
 - 1. End of Q4 2018, discuss with stakeholders options for Customer Behavior Metrics.
 - 2. End of Q2 2019, finalize draft of Customer Behavior Metrics and share with stakeholders.
 - 3. End of Q4 2019, finalize Customer Behavior Metrics and share with stakeholders.
- vi. Company will develop a business case for implementation of shadow billing feasibility, with the goal of implementing shadow billing for all residential customers.
 - 1. End of Q4 2018, Company will review draft plan of shadow billing with stakeholders.
 - 2. End of Q1 2019, Company will finalize business case for shadow billing and share with stakeholders to define next steps.
- vii. Education on the merits of the opt-in rates, both specific to the customers taking service thereunder as well as to customers at large, will continue from the dates addressed herein until the Company's next general rate cases.
- d. The Company will provide details of the education, marketing and outreach efforts, and customer TOU subscription numbers to the Commission at an on-the-record presentation in December 2019 and September 2020.
- e. When completed the Company will submit to the Commission the following documents on an ongoing basis: Customer research plan, business case for shadow billing, marketing and education plan, EM&V plan, Customer Feedback Mechanism, Customer Behavior Metrics, EM&V interim and final results and documentation shared at each stakeholder meeting.
- f. Company will meet with stakeholders by the end of Q1 2020 and end of Q1 2021 to discuss number of customers on TOU rate plan; changes in customer behavior including shift demands from peak periods and benefit from that shifting load; education effectiveness; customer feedback and questions; observations from summer vs non-summer rate impacts. Nothing precludes any stakeholder from making a filing with the Commission should it believe the Company is not actively providing reasonable outreach and education to their customers or other concerns regarding TOU deployment. Nothing prevents the Company from opposing any such filing.
- g. If by December 31, 2019 KCP&L and GMO do not have at least 750 customers per company signed up for the TOU service, stakeholders will discuss and consider changes to the education and outreach plan or changes to program design necessary to enhance enrollment.
- h. If KCP&L and GMO have not gained at least an additional 1000 customers per company by December 31, 2020, stakeholders will review education and outreach plan and program design changes necessary to enhance enrollment.

- i. By June 30, 2020, KCP&L will file a rate design case limited to TOU issues. For GMO, signatories further agree the September 20, 2016 Non-Unanimous Stipulation and Agreement in ER-2016-0156 will be expanded to include TOU, with the TOU rate design case to commence by June 30, 2020.
- j. KCP&L and GMO will submit a Residential TOU rate design in their next rate cases based on lessons learned from the TOU service.
- k. Company will complete an EM&V Report by December 31, 2021.
 - 1. End of Q2 2019, review draft of EM&V plan with parties and solicit feedback on parameters and methodology.
 - 2. End of Q4 2019, finalize EM&V plan with parties.
- I. KCP&L and GMO shall be authorized to defer for recovery prudently incurred program costs (representing the prudently incurred work detailed above and including marketing, education, evaluation and administration costs) associated with the TOU service. In the next rate case, KCP&L and GMO shall be authorized to recover prudently incurred program costs at the level represented by the percentage of customers enrolled in the TOU service at the time of filing of the rate cases compared to the above target level, not to exceed 100% recovery of costs. KCP&L and GMO will demonstrate that such percentage is not simply a result of transferring customers to a lower rate, but based on efforts directly related to changing customer behavior through marketing and education."

On September 27, 2018, parties to Dockets ER-2018-0145 and ER-2018-0146 entered into a non-unanimous partial stipulation and agreement regarding class revenue shifts ("Class Revenue S&A").⁴ Paragraph 4 of the Class Revenue S&A addresses customer education regarding rate design:

- 4(a). The Company agrees to develop and implement a customer education plan regarding the rate design presented in this Stipulation. In the development of the education plan, the Company will examine and evaluate leading educational processes and practices on customer education of rate designs. The Company's rate design education plan may include various forms of tools, marketing and customer education such as mailings, outbound calling, utilization of their Interactive Voice Response Unit ("IVR"), text messaging, website information, media outlets and outreach through various company partners including community action agencies, senior housing centers and others.
- 4(b). The Company agrees to provide Staff, OPC, and DE with a report detailing its planned rate design education program within the Q2 of 2019. The Company and interested parties may further address the Company's rate design education program within the stakeholder meetings identified in the Time Of Use ("TOU") Non-Unanimous Stipulation and Agreement filed on September 25, 2018 in these cases."

It should also be noted that on June 15, 2020, the Company filed a request for an extension of the Time of Use Rate Design Case referred to in Case No. ER-2018-0145, Section 2.i.. On June 29, 2020, the Commission granted the Company's request for extension and ordered the Company to file a TOU Rate Design Case by June 15, 2021. This Report fulfills that requirement.

2.2 ADHERENCE TO RATE DESIGN AND CLASS REVENUE STIPULATION AND AGREEMENTS

To date, the Company has fulfilled the requirements of the Rate Design and Class Shift S&A's regarding TOU. Table 1 is a summary of the meetings with signatories and presentations to the Commission to fulfill the Company's requirements.

Table 1: Summary of Company Meetings To Fulfill S&A Requirements

DATE	DESCRIPTION
December 20, 2018	TOU Stakeholder Meeting-Shadow Billing Business Case, Customer Research Plan, Customer Feedback Mechanism and Customer Behavior Metrics discussed
February 27, 2019	TOU Stakeholder meeting-Draft of the EM&V Plan was shared
June 28, 2019	TOU Stakeholder meeting Project goals, Marketing Campaign & Rate Education Plan, and Customer Service Approach
October 1, 2019	Company began offering opt in TOU rates
December 11, 2019	MPSC Presentation-Strategy, Marketing & Outreach & Education, Enrollment Success
January 22, 2020	TOU Stakeholder meeting- Strategy, Marketing & Outreach & Education, Enrollment Success
March 26, 2020	TOU Stakeholder meeting -COVID-19 Pandemic, Marketing Campaign Recap, Enrollments, Education Effectiveness and Customer Feedback
September 23, 2020	MPSC Presentation-Enrollments, Education & Marketing Campaign Update, Customer Feedback, and COVID-19 Pandemic Considerations
October 30, 2020	TOU Stakeholder Meeting-Enrollments Update and EM&V Update
December 17, 2020	TOU Stakeholder Meeting -Enrollments Update and EM&V Interim Results
March 29, 2021	TOU Stakeholder Meeting -Enrollment Update, Education Effectiveness, & Customer Feedback

In accordance with the Rate Design and Class Shift S&A's, the Company has strived to gain input from stakeholders on this TOU Rate Design Case submittal. The Company presented its plan to stakeholders on March 3, 2021.

3 EVERGY'S RATE MODERNIZATION PLAN OVERVIEW

In 2020, Evergy developed a Rate Modernization Plan ("Rate Plan") that will guide the Company on several identified rate objectives over a period of time. The Rate Plan provides a framework for Evergy that is both responsive to its historical regulatory obligations in Missouri and Kansas, but also provides a framework for the Company's future general rate case filings. TOU is an important element in the Company's overall rate portfolio and this report and filing have aided in informing the Company on its initial TOU rate offering established in October 2019. It is important to the Company that the Rate Plan addresses how TOU fits into its overall portfolio of choice based rates for our customers.

The drivers of Evergy's Rate Plan are not all encompassing. However, the drivers identified reflect that the utility must balance many forces to increase overall customer satisfaction while recovering revenue requirements. The Company identified the following drivers to inform the Rate Plan:

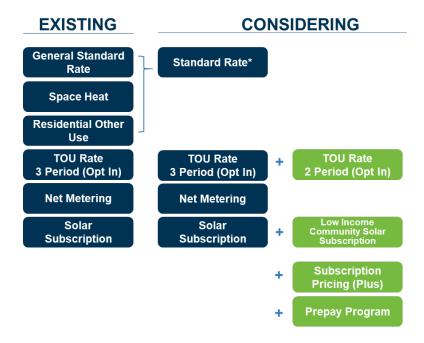
- Rates should include proper price signals that will enable adoption of emerging energy technologies that are most beneficial to the grid
- Rates should implicitly promote beneficial electrification and grid benefits
- Customer surveys indicate that higher customer satisfaction is directly correlated to choice
- As a result of mergers and acquisitions the past two decades, Evergy has multiple service territories in Missouri and Kansas with disparate rates
- Strive for rates that are more equitable across diverging customer classes and subclasses
- Significant MPSC and Kansas Corporation Commission ("KCC") interest exists around time of use and distributed generation rates

Through the Rate Plan, which will be executed over several rate cases and will flex with changes in regulatory outcomes, industry developments and customer desires, the Company will drive towards the following rate objectives:

- Creating rates that are independent of end use requirements
- Bringing rate structures closer together across jurisdictions
- Enabling business growth
- Simplifying rates and increase pricing transparency
- Providing greater customer choice
- Increasing customer satisfaction
- Leveraging Customer Information System ("CIS") and Automated Meter Infrastructure ("AMI") investments
- Developing price signals to increase grid efficiency

Considering these drivers, Evergy developed its Rate Plan. Figure 1 specifically highlights the components of the Rate Plan for Evergy's residential customers in anticipation of the Company's next rate case in Missouri⁵. As shown in Figure 1, the Company has developed a 2-period TOU rate to complement the Company's existing 3-period TOU rate offer. These TOU rates are further described in Section 5. A Low Income Community Solar Subscription rates, Subscription Pricing rates, and a Prepay program are further described in Appendix B.





*The Rate Plan may take several years/rate cases to fully capture rate designs being considered to meet goals.

⁵ Evergy does not address a Rate Plan for business customers in this Report.

4 SUCCESS OF EVERGY'S TOU RATE

While having the option to choose from multiple plans or services is not new in most aspects of a customer's life, the ability for an Evergy residential customer to choose from multiple rates is a new concept to customers given the regulated utility environment. Historically, rates have been focused on revenue recovery and providing only basic pricing signals. As the utility landscape has evolved, Evergy has prioritized choice for its customers. Following the approval of the Rate Design and Class Shift S&A's in October 2018, Evergy utilized the following twelve months to research, develop and implement the S&A's requirements to develop a TOU rate plan and looked to to turn this pricing mechanism into a productized solution for customers. To address these requirements, Evergy formed a cross-functional project team of over 80 subject matter experts from almost every area of the Company and began the year-long initiative to research, develop and implement a cohesive TOU solution.

Evergy deems that the TOU deployment has been successful, particularly if measured against the initial goals but also with respect to customer satisfaction. Within the 0145 Stipulation, each jurisdiction had a goal of reaching 1,750 customers by December 31, 2020. These goals were exceeded. As of June 11, 2021, Evergy exceeds the enrollment target with a total of 5,538 active enrollments (2,917 enrollments in Missouri West and 2,621 enrollments in Missouri Metro). This equates to about 160% of the stipulated goal.

The following sections describe the plan the Company undertook to develop a TOU Rate Plan that would be robust and responsive to customer needs. The primary goals of Evergy's TOU rate include:

- (1) expand realm of customer choice by offering new choice based, time varying rates;
- (2) reduce system coincident peak demand; and
- (3) align pricing structure with cost causation.

Appendix C includes examples of the Company's education tools referred to in this section.

4.1 CUSTOMER RESEARCH PLAN

By the end of 2018, Evergy had collaborated with stakeholders to develop a comprehensive Customer Research Plan that leveraged qualitative and quantitative customer feedback to inform critical product, marketing and education decisions. As part of this plan, a Customer Feedback Mechanism was developed that comprised of five channels for soliciting and measuring customer reactions. These include: Focus Groups, Surveys, Social Media, Contact Center, and Website.

In early 2019, the Company began implementing this Customer Research Plan, kicking it off with six qualitative in-person focus groups:

- Adults with kids
- Adults with no kids

- Electric vehicle ("EV") drivers
- Low-income adults
- Elderly and on a fixed income
- Elderly and not on a fixed income

The Company sought to understand customer reactions to the TOU rate plan, the products and tools that would be needed by customers to understand the plan and support them when taking service on the plan, identify segments most likely to enroll, and test marketing and education messaging and visual creative content.

Following the in-person focus groups, the Company measured quantitative reactions to these same questions and incorporated marketing and education message testing to a larger digital audience. Once the TOU plan was launched in October 2019, the Company implemented post-enrollment, un-enrollment and behavior change surveys, as well as a form submission on the website and tracking mechanisms on social media and through the Customer Contact Center to continue measuring customer satisfaction, solicit feedback and gain insights for innovation and continuous improvement. In the spring of 2020, after customers had been on the plan for at least six months, a series of in-depth interviews were conducted with TOU participants to have a more comprehensive conversation on the offering - what's working, what could be improved, what do you like the most, etc. These measurement mechanisms are ongoing.

4.2 IN-PERSON FOCUS GROUPS⁶

After learning about TOU and seeing the actual visuals on rate plans, almost all except the elderly were very interested in the TOU Rate Plan. The interested customers were motivated by the ability to make changes that would lower their electric bill. The two elderly groups (both fixed and non-fixed income) were very hesitant to adopt the TOU rate plan. Hesitancy rested on change, worry about whether they would end up paying more, and uncertain of Evergy's motivations.

Through the focus groups, the Company learned that customers are aware of their electricity usage and do try to control their usage. Their motivation is to lower their monthly electric bill, but not to reduce their electrical footprint.

4-8 pm is peak usage in many households ("HHs"), although not all. This is the time
when adults are getting home from work and children are coming home from school and
afterschool activities. Thermostats are set to ensure comfort, dinner is being cooked,
and members are using electricity for laundry, lights, TV, gaming, and phone charging.
Several said that their peak usage time is 6-10 pm.

⁶ In-Person Focus Groups (n = 47) Six 90-minute focus groups, Dates: January 29-31, 2019 / Six Groups: 1) No kids under 18 y/o living in HH, 2) With kids under 18 y/o living in HH, 3) Low-Income working, 4) Elderly and NOT on a fixed income, 5) Elderly and on a Fixed Income, and 6) Electric Vehicle Owners

- Activities that could be shifted fairly easily by most HHs were dishwasher usage (turned on later, or programmed later), laundry (shifted to other times or shifted to the weekend), and electric car charging (programmed to charge during the night).
- Changing the thermostat to "savings" during 4-8 pm would cause discomfort for most respondents. Most feel that they don't have any margin for thermostat change within the "comfort" temperature range and that their HH members would not tolerate less comfortable temperatures.
- Bathing (tended to be children), cooking, and TV were activities that were too timely to shift. These are activities that must happen during the 4-8 pm timeframe. A few did mention that they could shift cooking away from the peak hours by meal planning or cooking earlier in the day.
- Turning out unneeded lights is an activity that most customers saw as a potential savings, yet most said that they are already trying to turn out unneeded lights, to varying success.

The different customer groups had different capabilities to make behavior/usage changes:

- Elderly Many are home all day and could conceivably shift electrical usage to times earlier in the day (although they are very resistant to change).
- Low-Income This group is doing the most already to reduce usage. They set the
 thermostat to "savings" or completely turn it off more often, leave fewer lights on in the
 house, and try to cut back on appliance use. They are less likely to have a dishwasher
 and dryer than higher-income HHs. Many have smaller houses or apartments. This
 group is very interested in finding more changes to make but may have less electrical
 usage to shift or reduce.
- Families / kids under 18 This group has kid activities that must happen between 4-8 pm due to school and bedtime schedules: dinner, baths, afterschool TV/gaming/charging.
 Many parents are trying to do laundry that is needed for the next day. With more people in the house, it will be harder to get compliance from all family members. Families with kids under 18 years would have a very hard time making changes to their electrical usage.
- Working Adult HHs All-adult HHs are smaller so have fewer persons who are using peak time electricity. Many said that their schedule is flexible or that their peak time is later in the evening already. This is the group that is best suited to make changes to their schedule to accommodate the TOU rate plan.
- EV Owners While some EV owners charge their cars at work, many are charging them
 at home and could easily make use of their timers to schedule charging during the low
 rate nighttime hours of midnight-6 am. Those with cars that have a small battery were
 more likely to say that they couldn't wait to leave their battery on low until midnight.
 Those with high capacity batteries were already scheduling their charging for the later,
 non-peak hours.

In addition, customers expressed both questions and hesitations about the TOU Rate Plan:

- "I might end up paying more" top concern
- "It's not worth the discomfort for small savings" top concern
- "My household can't change their behavior or change enough"
- Suspicious of Evergy motivations/intentions
- Too complicated to figure out if savings are possible

4.3 ENROLLMENT SURVEYS⁷

Evergy has also been retaining results of TOU customer enrollment surveys. Results of the enrollment surveys include:

- Saving money was the primary incentive for switching to the TOU plan for 93% of enrollees.
- Just under 90% of Missouri Evergy customers were largely satisfied with the enrollment process for the TOU plan.
- Three-quarters of customers rated the TOU communications that included online tools, emails, and rate comparison reports to educate customers on the available plans - as very to extremely helpful.
- Just under half (48%) of the enrollees were aware of the Rate Comparison Tool. Of those, nearly two-thirds (63%) said the Rate Comparison Tool had a strong influence on their enrollment decision.
- While higher income customers were more likely to be aware of the Rate Comparison Tool (55% versus 44%), they were less likely to be influenced by it (56% versus 68%).
- Cost (96%) and comfort (85%) are the highest considerations on household electricity usage.
- Those that enrolled in TOU expected just under \$20 in monthly savings (average: \$19.11).
- Customers used a wide range of energy saving behaviors, even before their enrollment in TOU.
- Nearly all customers had at least one person at home during the peak hours.

4.4 UN-ENROLLMENT SURVEYS⁸

Results of TOU customer un-enrollment surveys include:

Increased electricity costs or failure to save were the two biggest reasons for opting out
of the TOU plan. Moving was also cited quite often, indicating that a process for
automatic re-enrollment process might be helpful.

For Incomplete Surveys (n = 1,114) Every customer who enrolled in TOU received an email inviting them to complete a short survey. These surveys were completed between October 21, 2019 and October 4, 2020. All respondents were sent a \$10 e-gift card for completing the survey.

Un-enrollment Surveys (n = 160) Every customer who un-enrolled in TOU received an email inviting them to complete a short survey. These surveys were completed between December 20, 2019 and October 4, 2020. All respondents were sent a \$10 e-gift card for completing the survey.

- Most of these customers put a great deal of effort into changing their behaviors.
 Running appliances during non-peak hours, turning off lights and running air conditioner less during peak hours were the most common changes with some finding them challenging to make.
- Those that chose to opt out of the plan were more likely to have people at home during the 4-6 pm time period.
- Making it cheaper, either through lower peak rates or non-peak rates, was mentioned by nearly a third of unenrolled customers completing the survey. Many customers who opted out also felt that they were not fully informed of how the pricing worked.

4.5 BEHAVIOR SURVEYS9

Participating TOU customers were also surveyed six months following enrollment. Results of the behavior surveys include:

- Two-thirds of TOU participants are satisfied and feel that the plan has met expectations. Older people are more highly satisfied (72% vs. 64%) and feel TOU has more fully met expectations (70% vs. 64%)
- Most customers saw their electric bills go down at least somewhat, on average \$17 a
 month. Over 1 in 5 were unsure of the TOU rate plan's impact on their bill. A few
 customers reported seeing their bills increase.
- TOU customers have been most successful with running appliances during non-peak hours and adjusting the thermostat. Older TOU customers feel they have been more successful in shifting usage (60% vs. 52%)
- Saving money was still the primary incentive for switching to the TOU plan after being on the rate plan for 6 months.
- Over half of TOU participants said the Rate Comparison Tool had a strong influence on their enrollment after being on the rate plan after 6 months. While nearly two-thirds rated the Rate Coach reports as very useful, less than half felt that way about the Energy Analyzer and Welcome Kit.
- Seventy-eight percent of TOU participants have reviewed their hourly usage at least a few times since enrolling. Almost two-thirds who did review their hourly usage found it useful.
- EV owners made a substantial movement to charging their electric cars overnight after enrolling in the TOU plan (24% to 84%).

⁹ Behavior Surveys (n = 750) Every TOU customer received an email inviting them to complete a short survey after being on the TOU rate plan for six months. These surveys were completed between July 16, 2020 and November 1, 2020. All respondents were sent a \$10 e-gift card for completing the survey.

- COVID-19 Pandemic made shifting to non-peak hours harder for more than one-third
 of TOU participants. More people were at home during the quarantine period both
 during peak times and in general.
- Over half felt that it was harder to shift their usage from the peak hours during warmer weather. The use of the air conditioner was the overwhelming reason that made it hard to shift usage.
- TOU participants most appreciate savings and pricing options, as well as awareness of their energy usage.

4.6 EDUCATION TOOLS

Per the Rate Design S&A, by the end of 2018 Evergy completed a business case that evaluated shadow billing. The business case included industry research on traditional shadow billing approaches, goals of shadow billing, best practices and pitfalls. Understanding the advantages of shadow billing allowed Evergy to establish goals and criteria to evaluate solution options. Evergy recommended a shadow billing approach that included three tools - Rate Education Reports, Online Rate Analysis Tool, and Post-Enrollment Rate Coach Reports¹⁰. These tools are delivered strategically and cohesively to customers to provide personalized information that allow customers the ability to better make decisions on managing their energy. This shadow billing strategy formed the foundation for Evergy's TOU engagement strategy. Marketing and education were then built in collaboration with this engagement strategy.

4.6.1 Pre-Enrollment Education Tools

The Company's pre-enrollment education tools include a Rate Education Report and an Online Rate Analysis Tool.

Rate Education Reports

A personalized paper and/or email report mailed and/or emailed to customers two times per year educating them on their rate plan options. Specific report features include: detail on why they are receiving the report, overview of different rate plans available, personalized cost comparison of rate plans the customer is eligible for, monthly and yearly rate plan comparisons, tips, and frequently asked questions.

Key statistics are as follows:

- 42% average unique open rate
- 68% average overall open rate, indicating many customers open the report more than once
- 60% spent time reading the report vs glancing or skimming it

¹⁰ See Appendix C for examples of the TOU education tools.

Online Rate Analysis Tool

An interactive web tool that includes rate plan comparisons, rate details and a rate simulator. The tool helps customers answer key questions including: How does this rate plan work? Is this the best rate plan for me? How will this rate affect my bill, short and long-term? What behavioral changes can I make that would make an optional rate plan, like TOU, work best for me?

Key statistics are as follows:

- 61% TOU customers interacted with the Online Rate Analysis Tool before enrolling
- 44% clicked the "Change My Plan" call to action within the tool

4.6.2 Post-Enrollment Education Tools

The Company's post-enrollment education tools include Rate Coach Reports and self-service hourly AMI data analytics.

Rate Coach Reports

Personalized, proactive, data-driven weekly report to TOU customers educating and coaching them on how to be successful on TOU. Customers receive an introductory report, week over week coaching, and a monthly peak usage and cost summary. Key report features include: rate details, hourly usage and costs visualization, weekly comparison, peak usage summary, tips, and season transition education when applicable.

Key statistics are as follows:

• 57% average unique open rate and many customers open multiple times. Opower¹¹ shared that this open rate was the highest in its experience in the utility industry. In addition, for comparison, Evergy company unique open rate average is approximately 40%.

Self-Service Hourly AMI Data Analytics

Interactive web tools that visualize customer hourly usage and costs.

Key statistics are as follows:

63k impressions, or views, since October 2019

¹¹ Evergy has retained Opower and partners with Opower to provide the TOU Rate Education Reports, Online Rate Analysis Tool, and Post-Enrollment Rate Coach Reports.

4.7 MARKETING OUTREACH AND EDUCATION PLAN

Evergy created an awareness, enrollment and success campaign to help customers understand their rate options, to reach and exceed the stipulated enrollment goal of 3,500 customers, and help customers to be successful to manage their energy on the new rate plan once enrolled.

The Company identified the four main objectives:

- Inform all customers on the new TOU rate option and how time of day affects electricity pricing.
 - o Measurement:
 - Location: TOU participation location percentages consistent with Evergy residential customer location
 - Result: TOU participation locations consistent¹²
 - Channels: Use J.D. Powers 2019 recommended communication channels for rate education (bill insert, direct mail, email, bill message, bill newsletter)¹³
 - Result: Used Bill inserts, direct mail, email, bill message and more
 - Rate Landing Pages: Increase TOU rate page visits 20% over Evergy's General Use Rate pages
 - Result: 800% more pages views vs Evergy's Standard Rate Page after Spring Campaign based on Google Analytics
- Educate interested customers on where to find information about the TOU option and how the rate plan works.
 - Measurement:
 - TOU Landing Page: Time of page (over 1 minute) and bounce rate (under 60%)
 - Results: 1:49 avarage time on page, 51.5% bounce rate based on Google Analytics after Spring 2020 campaign
 - Rate Comparison Tool Visits: Rate Comparison Tool percentage of enrollment Over 40%
 - Results: 61 percent
 - Rate Video Views: Achieve over 2,500 views
 - Results: 4,400 after one year based on YouTube video plays

¹² Based on Guidehouse Evaluation from December 2020

¹³ J.D. Power 2019 Electic Utility Residential Customer Satisfaction Study, SM – (Results includes Waves 1-3)

- Enroll customers in TOU, exceeding enrollment goals of 3,500, through targeted, datadriven marketing.
 - Measurement:
 - Enrollment numbers as of December 2020
 - Result: 2,261 Mo Metro, 2,744 Mo West¹⁴
 - Enrollment channel: Goal of over 70% enrollments coming from online
 - Result: 91% as of 12/14/2020
 - Surveys: Post-enrollment surveys to understand enrollment experience and any challenges
 - Results: See section 4.3, 4.4 and 4.5 for results
 - Marketing channel: Channel performance at or above industry benchmark
 - Result: Just under 90% of Missouri Evergy customers were largely satisfied with the enrollment process for the TOU plan.
- Assist customers who have enrolled by creating tools and an ongoing communication campaign.
 - Measurement:
 - TOU Rate Coach Report open rates, stay at or above Evergy marketing email average of 40% open rate
 - Result: Over 57% average weekly open rate
 - Survey Response: Use post-enrollment survey, 1:1 interviews and unenrollment survey data to understand customers understanding or rate and communication needs
 - Results: See section 4.3, 4.4 and 4.5 for results

Evergy developed a multi-pronged education and outreach campaign to educate customers about the new TOU rate plan, while also specifically focusing on key segments who, based on research, were likely to enroll. Prior customer feedback reflects that rate information feels complicated, so it was imperative to simplify messaging and use strong visuals to help customers understand the complexities of the TOU program relative to the standard rate. Due to the multiple TOU time frames and pricing¹⁵, the offer had the potential of being confusing. Therefore, the team focused on messaging, creative, tools (pre-enrollment and post-enrollment), and outreach tactics to engage the TOU customer.

¹⁴ Based on GuideHouse Evaluation from December 17, 2020

¹⁵ The current TOU rate includes 3-period pricing of Off-Peak: 6 am-4 pm and 8 pm-12 am; Super Off-Peak: 12 am-6 am; and On-Peak: 4 pm-8 pm.

4.7.1 Messaging

Because the TOU rate could feel complicated relative to the standard rate and hard for customers to remember and understand the time periods, a simple tagline of "Wait 'til 8" was developed to help customers understand the plan and what times they needed to shift their usage to save money. While there are other time periods during the day that a customer could save money, Evergy wanted to simplify the concept and make it easy to understand, therefore the "after 8pm" messaging was selected.

4.7.2 Creative

The Company identified the need to develop a creative concept that tapped into everyday behaviors to connect the new plan in a simple, fun and memorable way. It was important to show customers that they could save money on energy with the new plan – not by changing what they do, but when they do it. To do this, a simple everyday clock concept was developed, with a tagline of "Wait 'til 8" in the middle to help customers remember the after 8 o'clock message. Then, a bold, everyday appliances imagery like a dishwasher and washing machine, was paired with a clock to visually represent the types of changes a customer would need to make to be successful on the new plan.

4.7.3 Pre-Enrollment Tools

During the focus groups, the Company learned that customers were interested in new options, but they wanted to be able to do a lot of their own research and self-educating before selecting a new rate plan. Therefore, it was important to provide new, easy to understand tools to help customers learn about the rates and use personalized energy usage information.

Rate Education Reports

Mass awareness and understanding of the new rate options was an identified goal. As a special direct mail and email item, each customer would receive a personalized Rate Education Report two times per year – one in the spring and one in the fall. This personalized report educates customers about their new rate plan options, leverages customer AMI data to explain how the plan works and provides a detailed rate comparison of what a customer would have paid over the past 12 months on the two different rate plan options.

Online Rate Analysis Tool

To provide a great online experience and to help customers compare their options and costs, an Online Rate Analysis Tool was added. This new tool allows customers to login to their billing account and compare what they would have paid over the last twelve months on TOU compared to their current rate. Evergy data shows that over 60% of customers who signed up for TOU first looked at this comparison tool before deciding to enroll.

4.7.4 Post-Enrollment Tools

Knowing that this was a new concept for customers, and if behavioral changes did not persist, customers may realize a higher energy bill, instead of lowered energy costs. Therefore, data driven tools and continuous education were imperative to help customers be successful on the new TOU plan. To accomplish this, Welcome Kits and Rate Coach Reports were developed to increase a customer's success of participating on the TOU rate.

Welcome Kit

Once a customer enrolls, they receive a welcome letter via US Postal Service. The welcome kit provides a tear-away card with the rate hours to keep on hand and a "Clean/Dirty" dishwasher magnet that reminded customers to "Wait 'til 8" to run their dishwasher.

Rate Coach Reports

A week after a customer signs up for the TOU plan, they begin to receive a weekly email report called the "Rate Coach". This weekly email serves as a proactive success tool, delivering to customers key TOU information. It provides customers an hourly breakdown of usage and costs overlaid with the pricing period time frames to help them understand their hourly, daily and weekly consumption patterns and how that impacts them considering the TOU rate structure. It also provides a week over week comparison to encourage continuous improvement, a time period and pricing reminder to reinforce the TOU pricing differentials and importance of usage shifting out of the peak period, and realistic tips to continue to educate on and motivate behavioral changes. Research has shown that these weekly reports are TOU customer's favorite success tool. These reports realize nearly a 60% unique open rate each week, with most customers opening it more than 3 times.

4.7.5 Outreach Tactics

A campaign goal was to provide a large-scale customer awareness campaign and to meet and exceed enrollment numbers. To do this, the Company used both mass awareness and more targeted enrollment tactics.

Website

The Company made updates to the rate plan webpage, adding more customer-friendly language, new graphics and a new video which explained how the rate plan works. A new special campaign landing page was developed, which includes additional graphics that matched many of the TOU marketing items, new helpful charts, a video and additional information and imagery.

Video

A new TOU video was created to help explain the new program and concept. The three-part video includes: "How the Rate Works", "Why We Have the New TOU Rate Plan", and "Tips on Being Successful on the Plan".

Digital

The digital campaign included mostly short animated ads to grab the viewer's attention, while also allowing for extra time to share more information about the plan. The creative followed the rest of the campaign and directed customers to landing pages to learn more. Targeted display ads were used to hit key enrollment groups, while also using pixels to retarget individuals who visited the site but chose not to enroll.

Social

A mix of Awareness and Enrollment ads were used to help spread mass awareness. For Awareness ads, Facebook video, static and carousel ads were used to help explain the TOU Plan and provide key points. In Enrollment ads, research-backed audiences of "Early Adopters", "Auto Savers", and "Working Adults with No Kids" were used to target with the ads. In addition, social ads were developed for lookalike customers who enrolled during our first phase and retargeting pixel ads.

Radio

To help accomplish a goal of mass awareness of the TOU Plan, the Company partnered with Fradio to accomplish much of the mass awareness needs. Because research shows that area customers spend a lot of time in the car listening to the radio, the Company used a a "sandwich" approach to the radio ad, with a very catchy jingle used at the opening and closing of the ad and a more informational section in the middle.

Email

Using customer email list and segmentation based on research findings, the Company used email to target customers to enroll. Costumed graphics and copy were used for target groups, including "EV drivers", "Auto Savers", "Working Adults with No Kids" and "Technology Adopters".

4.8 IMPLEMENTATION

It was important to build momentum for the introduction of the new TOU Rate Plan. As a traditional product adoption curve illustrates, connecting with Innovators and "Early Adopters" to ignite early awareness, enrollment and advocacy would allow the Company to move in a positive direction to build greater awareness within the larger customer base. A four-phased implementation approach was developed.

4.8.1 Phase 1: Employees

Not only was the TOU Rate Plan new for customers, but it was also something different for most Evergy employees. Providing a strong foundation to employees was important as they are often on the front-line getting questions from their friends and neighbors. The Company started with an internal employee campaign to help all employees, from linemen to accountants, understand how the TOU Rate Plan works and to be confident advocating the new plan to their families and friends. Unique ways were created to get the key message points to stick with team members which included restroom mirror clings, elevator wraps in all buildings, a desk info card and identification badge card with helpful information.

4.8.2 Phase 2: Early Adopters

The second phase, which lasted about three months, included reaching out to customers who are identified as "Early Technology Adopters" and customers who may believe the TOU Rate Plan could be an easy switch for their current lifestyle. This would allow the Company to test the new tools and enrollment process, develop success stories to help advocate for the new rate plan and continue to test messaging and creative. In this phase, email, a low-cost tactic, was used to allow for different messages to be tested. The three main target groups for this phase included:

- "Early Technology Adopters": The Company identified this group through third party data and matched it with customer information. This group tends to be familiar with being the first to try something new and willing to give feedback.
- "EV Drivers": EV drivers are generally already familiar with new technology and options. In addition, they would benefit from the off-peak charging times for their vehicles.
- "Auto Savers": Through an electric usage analyses, we identified customers who would automatically save money on the new TOU rate, without much lifestyle changes.

4.8.3 Phase 3: Mass Awareness

In this phase, mass awareness channels, like radio, were used to create wider reach for the TOU message. Though research using U.S. Census data, the Company learned that Evergy's overall customer group spends a lot of time in the car. On average, the drive commute in Evergy's region is 23 minutes, and 83% of those employed drive to work alone, meaning the Company had a captured audience who often listened to the radio each day. A radio campaign was developed using high-level messaging to drive customers to our website where they could learn more. The Rate Education Report is also mailed to all residential customers.

4.8.4 Phase 4: Enrollment

Our fourth phase was geared toward getting enrollments into the TOU Rate Plan. Through focus groups and online surveys, "Working Adults with No Kids" were identified as a group who was very interested in the program and felt they could make the lifestyle changes necessary to be successful on the new rate. Marketing channels, like social, email and digital, were used to target messaging to this group, in addition to other main audiences like EV Drivers and "Routine Changers".

4.9 EVALUATION, MEASUREMENT AND VERIFICATION (EM&V) PLAN

In accordance with the Rate Design S&A, Evergy agreed to submit an EM&V plan, provide for an interim EM&V report by December 2020, and a final EM&V report to be completed by December 31, 2021. Evergy retained Guidehouse Inc. ("Guidehouse") to support the efforts to study residential TOU rates and provide independent evaluation services to verify the ex-post (historical) impacts of the TOU rates.

Evergy shared the results of the interim EM&V results to stakeholders on December 17, 2020. Below are the key findings from the interim EM&V:

- Results indicate that the TOU rate and associated program design has had the desired effect of reducing consumption during the on-peak period (4-8 pm M-F) in both the summer and non-summer seasons and driving participant bill savings (on average).
- Peak System Impacts TOU participants lowered their demand by 4-9% at system coincidence peak.
- Bill Impacts On average, participants are saving annually. Summer bills see the
 greatest savings, approximately half of which are driven by behavioral changes while
 non-summer bills see an increase for those previously on the electric heating rate
 primarily driven by rate structure changes.
- Annual savings for residential general customer ranges from 5 to 10%.
- Annual savings for residential space heating customer ranges from 3 to 6%.
- Enrollments the Company had exceeded stipulated enrollment targets within the evaluation year, which at the time was 142% of the overall Missouri enrollment target of 3,750 customers¹⁶.
- Attrition Approximately 50% of attrition (700 customers) that occurred during the evaluation year was from customers moving.

Appendix A includes detailed information regarding the interim EM&V report. Evergy will also submit a final EM&V report per the Rate Design S&A by December 31, 2021.

¹⁶ Evergy had achieved 142% of the stipulated goal (3,500 customers) at December 7, 2020 at the time of the presentation of the interim EM&V. As of June 11, 2021, the Company has achieved 5,538 active enrollments (2,917 enrolled customers in Missouri West and 2,621 enrolled customers in Missouri Metro). This equates to about 160% of stipulated goal.

5 TOU RATE DESIGN PLAN

5.1 INDUSTRY RESEARCH & BEST PRACTICES

Evergy, with the assistance of Brattle, conducted research and benchmarking on TOU deployments across the electric utility industry. Despite the fact that TOU rates are available in most states, enrollment in TOU rates is still very low nationwide, with only a few utilities having substantial (>10%) participation in TOU rates.

5.1.1 Best Practices in TOU Design

The analysis of dozens of TOU pilot programs worldwide indicate that customers do respond by shifting consumption and reducing peak demand. The design choice that most affects the impacts of TOU rates is the ratio of peak to off-peak prices, with stronger price signals yielding higher peak load reductions.

The TOU rate being offered by many utilities today fall into two design categories, legacy and modern. Legacy TOU rates were often introduced decades ago to satisfy Public Utility Regulatory Policies Act requirements and have not been heavily marketed to customers. Many legacy TOU rates have very long (i.e., >6 hour) peak periods, an increased fixed charge (to cover the cost of a TOU meter), and mild peak-to-off-peak price differentials.

Widespread AMI deployment led to a new, more customer-centric generation of modern TOU rates. These rates generally are designed with the simultaneous goals of reflecting costs, encouraging load shifting, and accommodating customer preferences. A survey of TOU pricing pilots over roughly the past two decades provides useful insight into the design best practices of modern TOU rates, which include:

- Most TOU rates are offered on an opt-in basis.
- Many utiliites offer customers multiple TOU rate option choices.
- On-Peak time periods are significantly shorter, typically 4 hours.
- Modern designs have significantly higher On-Peak to Off-Peak price ratios.
- There is a clear relationship between peak impact and Peak to Off-Peak price ratios.
- Utilities with large solar penetration are shifting their On-Peak period to address the changing system load patterns.

5.1.2 TOU Deployment Strategy, Opt-In vs Opt-Out

As discussed in Section 3, in Dockets ER-2018-0145 and ER-2018-0146, the MPSC approved that KCP&L and GMO would offer a residential **opt-in** Time of Use Service (effective October 1, 2019) as an alternative to the Company's standard residential rate. The TOU opt-in rate would also remain in effect until changed by Commission order.

The subject of opt-in versus opt-out TOU rates has been debated in the electric utility industry for several years. An opt-in structure is such that the default is a flat rate or a blocked/tiered rate and a customer may choose to have a time varying rate. The choice of remaining on the status quo flat or blocked/tiered rate is the choice of the customer. On the other hand, an opt-out structure is such that a commission mandates that all customers are placed on the time varying rate, which forces a customer to take action to revert to the flat or blocked/tiered rate, or select another rate within the utility's portfolio of rates.

States and commissions have adopted different approaches on opt-in versus opt-out. Most utilities in the U.S. still offer TOU rates on an opt-in basis. In a limited number of cases, some utilities have or will deploy TOU on a opt-out or mandatory basis. For example, in California, by 2022, all investor-owned utility ("IOU") companies must automatically move customers to a TOU rate. Customers will be provided the option to "opt out" and stay on their current rate or select another rate. Depending on the utility, some customers, such as low income, will be considered differently and may be offered a different rate.

The California default TOU path began in 2013 and came as a result of legislation to reform residential rates. Specific guidance was offered and key steps were expected to be completed by IOUs to ensure readiness. That transition spanned seven years (2015-2022). It is yet to be determined how successful these rates will be. The success will be contingent on a number of factors.

Another well known default TOU rate was the one offered by Puget Sound Energy in 2001, which had a slight peak to off-peak differential. Following a backlash related to limited customer bill savings because of this low differential, the result was an immediate opt out by 10% of its 300,000 customers and Puget terminated its program in 2002.

In addition to national research, Ameren transitioned to a portfolio of TOU rates in Docket No. ER-2019-0335. Ameren's portfolio includes TOU rates that have different rate differentials and periods. Their portfolio consists of the following: Anytime Users rate, Morning/Evening Savers rate, Overnight Savers rate, Smart Savers rate, and Ultimate Savers rate. With the exception of the Anytime Users rate, the balance of the rates feature time variation in the price of electricity. The Ultimate Savers rate includes a demand charge. Evergy understands that Ameren's AMI deployment will be completed in 2024 at which time all of their customers will fully be able to select service under these rates. Evergy is not familiar with any publicly available results (eg, EM&V, customer satisfaction, off peak load shift) from Ameren's TOU rate offerings to this date.

Brattle performed research for Evergy for purposes of this Report and found that:

Opt-out TOU deployment remains an uncommon deployment method across utilities
 Brattle identified 100+ residential TOU rates offered by IOU across the U.S. Most of these
 TOU rates are opt-in. Consumers Energy (Michigan), Xcel Energy (Colorado), and the 3
 IOUs in California (Pacific Gas & Electric, Southern California Edison, and San Diego Gas &
 Electric) have the only opt-out rates among IOUs as far research indicates. The opt-out
 rates offered by these utilities have all been implemented within the past two years.

- Average peak demand reduction per participant is higher under opt-in deployments
 than opt-out deployments. There are few pilots directly comparing opt-in versus opt-out
 rate designs. One is the Sacramento Municipal Utility District's evaluation of opt-in
 versus opt-out TOU pilots, which found that the average response per opt-in TOU
 participant was double that of an opt-out TOU participant.
- **Customer satisfaction** under TOU remains high either opt-in or opt-out. The majority of customers who started and also completed TOU pilots, expressed a high level of satisfaction in their experiences with the new rates and continued taking service under the rate after the study ended, provided such opportunities were available.
- Opt-out rates have higher enrollment rates relative to opt-in rates (e.g., 80% enrollment for opt-out versus 20% enrollment for opt-in). "Inertia" causes the majority of customers to stay on their default rate. Time and significant marketing will be required to drive towards a high opt-in rate enrollment. For example, OG&E reached ~20% penetration of its residential class on the Variable Peak Pricing rate tested after a little more than three years of marketing it.¹⁷
- Opt-in programs can potentially achieve greater overall impact due to the fact that opt-in offerings achieve greater impacts per-participant than opt-out program participants. The strong price ratio in Evergy's TOU rate design (6:1)¹⁸ is expected to produce greater system peak demand reductions than an opt-out TOU rate with a mild price differential. Brattle's analysis concluded that an opt-out rate offering with 80% participation would need to have a price ratio of greater than 2:1 in order to produce the same impact as Evergy's opt-in TOU rate with 20% participation.

Evergy has achieved an approximate 1.1% customer enrollment in its opt-in TOU program to date over a 20 month period. While customers continued to enroll during the COVID-19 Pandemic and Evergy did not see a higher than normal un-enrollment in the TOU program, it is likely that customer enrollment was hampered by the COVID-19 Pandemic. Additionally, it will require time for customers to become more aware of the TOU offer, which will occur over time through education and marketing efforts. As described in Section 4.6, Evergy will continue to offer the three core TOU education tools which include the Rate Education Reports, Online Rate Analysis Tool, and Post-Enrollment Rate Coach Reports. These tools have had very good success with customers and have been received positively by customers as indicated by research and data analytics.

^{17 &}quot;Final Report on Customer Acceptance, Retention, and Response to Time-Based Rates from the Consumer Behavior Studies" by US Department of Energy, November 2016

¹⁸ Throughout this report, ratios are presented to reflect the pricing relationship between the TOU periods. In this example, 6:1 indicates that the on-peak price is six times the off-peak price. The supporting text offered with the respective ratio should help the reader to understand the periods being compared and represented with the ratios.

Section 5.3 offers further detail on the Company's strategic intent with respect to the inclusion of TOU rates in its portfolio of residential rates.

5.2 CUSTOMER RESEARCH

Evergy believes that a TOU rate should reflect customer preference in order to maximize results and objectives. The Company has a long history of listening to our customers and working to best understand what they want in many facets of energy and as their energy provider, exploring electric rates with customers is no exception. Specifically in the last 5-10 years, as part of industry research studies, ongoing research with customer panels and as deliverables of agreements in prior regulatory proceedings, the Company has engaged with customers in numerous ways around their electric rates. One common theme rings true in the results from these studies and that is the ongoing desire for customers to enjoy a choice of rate plans.

When breaking down some of the prior research into "past" or pre-TOU pilot launch and "current" or during the TOU pilot activity, the trends of customers insights stay steady with a strong preference for electric rate choice. These studies and few current findings include:

"Past" – Previous studies incurred to learn from customers on rate preferences and behaviors

- 1. Industry studies on rates and customer behavior (Electric Power Research Institute 2015)
- 2. Residential Rate Design Strategy Study (Burns & McDonnell 2017)
- 3. Demand Side Management ("DSM") Market Potential Studies (2017, 2020)
- 4. TOU Pre-launch Focus Groups (2019)

Relevant finding: Most customers said they wouldn't like a mandatory TOU rate plan but also understand that customers don't have a choice.

"Present" – Engagement with current TOU rate participants and non-participants postenrollment/un-enrollment and behavior change surveys and 1:1 interviews (2019-2021)

- 1. Current TOU participant 1:1 behavior surveys (2020-2021)
 - Relevant finding: Over half of TOU participants would regard Evergy less favorable if they required participation in the TOU plan.
- 2. Rate Modernization all customer survey (2021)
 - Relevant finding: Ninety-three percent of Evergy customers feel it is important to have choice in rate plans. Bill amount and complexity are the two most important considerations when choosing a rate plan. More than half (57%) would be less satisfied with Evergy if TOU were mandatory.
- 3. JD Power Residential Electric (Annual)
 - Relevant finding: Customer satisfaction is higher among customers who have switched from the default rate plan to one they have chosen.

Additionally, Evergy will continue to learn from its customers following approval of new rate options. Activities to obtain feedback and stay in tune with customer attitudes could look similar to the list below.

"Future" – Expected ongoing interaction with TOU participants and Evergy customers at large

- Repeat current TOU participant and non-participant survey instruments enrollment, post-enrollment and non-participant attitudes towards their experience and/or preferences.
- 2. Evergy online customer panel engage with customers who are interested in giving feedback around energy topics to understand rate choice preferences including experience with existing offerings and preferences around potential offerings.
- 3. Monitor social media ongoing observations of Evergy customer reactions to existing rate choice offerings to identify if emerging trends for Evergy to take action.

5.3 STRATEGIC INTENT

As the Company continues to move forward with offering its TOU rate, it is important that it delivers on the expectations of the initial Commission approval and appropriately improves upon the rate offering. Earlier in this report the Company detailed the development of its Rate Plan and identified the drivers and goals behind that plan. These broad objectives informed action on a variety of rates with TOU rates being an integral part of the Rate Plan. Strategic expectations for the TOU rate were detailed in the negotiated conclusion of the Company's 2018 Missouri rate cases. As set forth in Section 2.1 of this Report describing the elements of the Rate Design S&A, parties agreed that "TOU rates should be part of a broad selection of rates offered to Customers and utilized to help the Company provide an opportunity to Customers to shift demands from peak periods and benefit from that shifting load. Further, TOU rates allow the Company and Customers to extract additional benefit from recent upgrades in metering and billing systems." ¹⁹

In confirming the TOU rate design's place in a broad selection of rates, the Company examined a range of rate alternatives deployed by electric utilities and noted that most are seeking some balance between risk and reward. This relationship is best visualized in a chart offered by Dr. Ahmad Faruqui of the Brattle Group. Figure 2 shows a number of rate design approaches along a continuum, expressing how these rate offerings balance customer risk and reward.

¹⁹ Non-Unanimous Partial Stipulation and Agreement Concerning Rate Design Issues. Case No. ER-2018-0145 and ER-208-0146, filed September 25, 2018, page 2

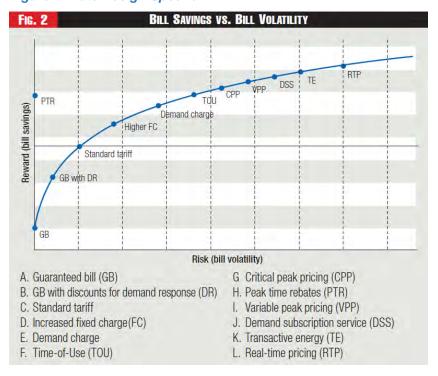


Figure 2: Rate Design Spectrum²⁰

The baseline reference of Figure 2 is the standard tariff. Other rate design approaches are represented along a curve with higher or lower bill savings and high or lower bill volatility. TOU is shown to the right of the standard bill, suggesting that the TOU rate delivers a higher opportunity for bill savings, but does so with higher bill volatility for the customer. TOU rate designs are distinctly different from standard rate designs and successfully serve as a viable options for customers. Under the Company's Rate Plan, TOU continues to serves a distinct role in the portfolio of rate designs the Company is considering for the future.

Evergy has observed that utilities who offer portfolios of rates experience a distribution of customers across the rate offerings. This is to be expected and in the Company's opinion, a healthy outcome. For example, in 2013 Oklahoma Gas & Electric Company ("OG&E") offered seven distinct rate options to its residential customers. OG&E further reported that participation varied across these rates such that about 44% of the customers sought rates that provide price security, about 36% sought rates that provide price sensitivity and about 20% sought to remain on standard tariff pricing. Georgia Power, for example, offers seven rates for customers to choose from so that customers may "choose the right plan for your budget and lifestyle". Georgia Power's rate plan includes a variety of rates that range from standard residential service to time of use to prepay and a flat bill. Evergy would expect similar distribution of

²⁰ Ahmad Faruqui, Rate Design 3.0: Future of Rate Design, Public Utilities Fortnightly, May 2018, page 38.

²¹ https://www.georgiapower.com/residential/billing-and-rate-plans/pricing-and-rate-plans/plug-in-ev.html

customers across the various rates, similar to OG&E, and the rate plan offered by Georgia Power is similar in concept to the Rate Plan presented in Section 3.

In confirming the expectation of extracting additional benefit from Evergy's recent upgrades in metering and billing systems, one should first consider the nature of these upgrades. At the time of the 2018 Stipulation, the Company, specific to the KCP&L-MO and KCP&L-GMO jurisdictions, endeavored to replace its CIS, or billing system, and deploy an AMI system. The billing systems of both utilities and the Automated Meter Reading ("AMR") system used by KCP&L had reached end of life and replacement was needed. Sufficient benefit to justify the upgrade was expected to be received by bringing the jurisdictions together under a common billing system and AMI system. Important benefit was provided in the area of customer data. In deploying TOU rates, it was expected that these systems could enable further benefit. These expectations have been substantiated through review of customer surveys and the other customer interactions, as it has been demonstrated that TOU has been effective in raising the energy awareness of participating TOU customers. In addition, the Company has communicated comparison of TOU and standard rates in the Rate Education Reports to all customers – participating and non-participating. Among other activities, the Company specifically utilizes the AMI data to support education on the TOU rate plan.

In addition, most significant has been the transition to broader utilization of AMI data. Evergy has every indication that the capabilities of the new billing system and AMI upgrades are providing benefit consistent with the investment and that TOU allows for the extraction of additional benefits.

Turning to the TOU Rate Design Plan and confident these stakeholder and Commission initial expectations are being met, Evergy re-evaluated the state of the Company since the 2018 TOU agreement. Much has occurred since that time and two primary events were relevant in assessing the Company's TOU plans going forward. These events include the merger with Westar and the announcement of Evergy's Sustainability Transformation Plan ("STP"). The merger with Westar brought with it the assets and customers, but also the rate structures and approaches deployed in that jurisdiction. KCP&L and Westar had many similarities but also many differences, all that needed to be brought together as Evergy. At the time of the merger, Westar was planning a billing system replacement, had deployed a limited TOU pilot and was initiating the deployment of an AMI system. Although similar in concept to the work being undertaken by KCP&L side, there were many details that were distinct. As a result, viewing TOU rate design plans from a combined company, or Evergy, perspective required some adjustment.

With the announcement of the STP, Evergy set out its vision to become a sustainable energy company, transitioning generation, modernizing the grid, achieving cost efficiencies and creating an enhanced customer experience. These goals provide an overarching context to guide plans for rate design. The Rate Plan and the TOU Rate Design Plan seeks to complement the goals of the STP.

Under these events and other more tactical perspectives, the Evergy team set out its considerations for the TOU rate design. Efforts began with the consideration of traditional rate design principals, like those exemplified by the Bonbright Principles. The TOU Rate Design Plan represents the continuation of the existing strucutre but yet enhancements. The Company considers the following notable additions:

- TOU remains an important part of Evergy's plans for today and in the future.
 Customer Experience is identified as one of the four, key elements of the Evergy STP Plan. Giving customers a choice on their rate plan has been identified as a factor in ensuring the customer experience remains positive. As explored in Section 5.2 of this report, significant weight was given to customer considerations through customer research. In addition, the Company's Rate Plan reinforces the need for not only the existing 3-period TOU plan, but expanding it to also offer a 2-period TOU plan.
- It is appropriate to providing a broad selection of rates. Building on the prior point, customers have expressed a preference for choice in their rate plan. As shown in Figure 2, a number of commonly deployed rates offer customers a range of options to seek the balance of risk and reward suitable for their situation. TOU rate designs, introducing more bill volatility but offering greater opportunity for savings, move beyond simple cost recovery and seek to influence behavior. The influence is certainly through pricing but is also established by educating customers and helping to align their point of view with the cost drivers observed by the utility. Customer relationships are critical in helping achieve this alignment. A growing portion of customers seek to be more involved in their energy experience. Others are seeking less involvement, instead seeking predictability and control. By providing choice and meeting customers where they are, we expect to receive a more meaningful and lasting effect from the offered rate designs.
- The TOU approach implemented by Evergy is working. When the plan for TOU was defined in the Rate Design S&A, the Company and parties worked together to define "a meaningful and successful process to establish alternative rate plans in the form of Time of Use ("TOU") rates for residential customers following accepted best practice and ensuring measured impact to customers within the class." The process was based on customer education and allowing customers to self-select, or opt-in to, the TOU rate. As Evergy evaluates conditions today, key conditions relevant for TOU deployment such as capacity positions, capacity availability and customer interest are largely the same as they were in 2018. With that, the Company is committed to continuing the TOU deployment largely consistent with the initial deployment. Evergy has been monitoring publicly available information from other utilities that have implemented TOU rates, including recent TOU deployments and the new TOU proposals in rate case filed by Ameren. Evergy has evaluated these developments and again remains committed to the plan, concluding that a selected approach by a utility is dependent on many factors and "one size does not fit all".

²² Refer to Order Approving Stipulations and Agreements, dated October 31, 2018, Section 2.a. Also referred to in Section 2 of this Report.

- Alignment of rate designs across Evergy is an appropriate goal. As Evergy brings together the various jurisdictions, having a common rate plan portfolio is a necessary goal. In defining the Rate Plan as well as this TOU Rate Design Plan a focus was kept on aligning rate structures and ensuring a path that will ultimately unify the rate portfolios of the Evergy jurisdictions. While Evergy will certainly look to do what is best for its customers and shareholders within its respective regulatory structures of the Missouri and Kansas jurisdictions, it recognizes that customers simply see Evergy as one company and our customers and shareholders will benefit from increasing consistency with all customer-facing elements of the Company's operations. This is a significant step and one that may take years to fully achieve.
- TOU rate designs present challenges and some issues cannot be resolved. At face value, TOU rate designs seem to be a good rate design for all customers. However, under closer examination, one might say this is not true. Two situations exemplify the types of issues that may be encountered if expanded or mandatory rates are ordered. First, TOU rate designs are not well suited for customers with loads that cannot be shifted. Customers with continuously running medical equipment or simply those with low levels of usage cannot shift usage to achieve the potential bill savings. Enabling technologies may not be deployed to better respond to the rate's price signals.

Second, net metering presents a challenge. Issues with net metering and TOU are driven by statutory provisions that have not been updated to reflect dynamic rates. In Missouri, netting and excess provisions are built around the billing period, or month, and do not include provisions that would allow the net metering process to reflect the pricing established by the TOU rate design. Evergy expects that statutory change would be needed to resolve this inconsistency. It is logical to think that the existence of AMI should compel a company to deploy TOU to all customers, however, the truth is some situations are not yet ready for TOU.

When combined with the customer-facing value of rate plan choice, Evergy remains in support of measured and optional deployment of the TOU rate design.

Evergy has taken a broad view and remains open to new information in considering its TOU Rate Design Plan. The TOU Rate Design Plan builds on its successful initial roll-out of the rate and continues to establish a Rate Plan that respects customer choice and allows for further maturization of the policies and environments where the TOU rate will be utilized.

5.4 TOU RATE DESIGN ANALYSIS

This section of the Report provides the results of Evergy's analysis to determine the most appropriate and best time period constructs and price differentials for residential TOU rates for near term offerings to its customers. This analysis is presented in the following sections:

- TOU Season Analysis
- TOU Time Period Analysis
- TOU Price Differential Analysis

The analytical approach was geared toward determining the optimum seasonal TOU pricing periods and price differentials that will reflect the current drivers of system generation and distribution capacity needs and the market energy price variation. To determine the seasonal TOU pricing periods, this study assembled and analyzed system and retail class loads and wholesale cost data for 2019, which represents the last full calendar year of data available.

5.4.1 TOU Season Analysis

Evergy performed a Seasonal Rate Period Alignment Study that explored the possible alignment of seasons across the Evergy jurisdictions. The proposed TOU Rate Design Plan implements a consistent summer season period from June 1 to September 30 for both the Evergy Missouri jurisdictions for TOU rates. There is considerable empirical support for the selection of this four month summer season rate period.

Figures 3–5 show that Evergy and each jurisdiction individually exhibit the highest daily peak load in in the four months of June, July, August, and September. A more detailed analysis for each jurisdiciton, illustrated in Figures 6-8, shows that all hours in which the system load exceeds 90% of the annual system peak hour (pink shading) occur during the months of June through September. This analysis also shows that the majority of hours in which the system load exceeds 75% of the annual system peak hour (yellow shading) also occur during this four month period, with a few hours occurring during the non-summer period.

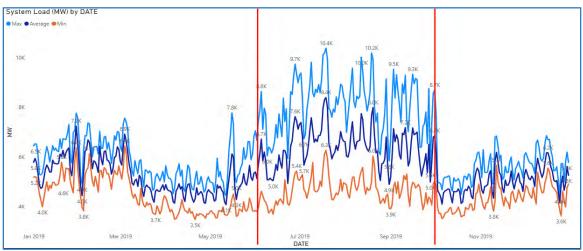


Figure 3: 2019 Evergy Daily Peak, Average, and Minimum Loads (MW)

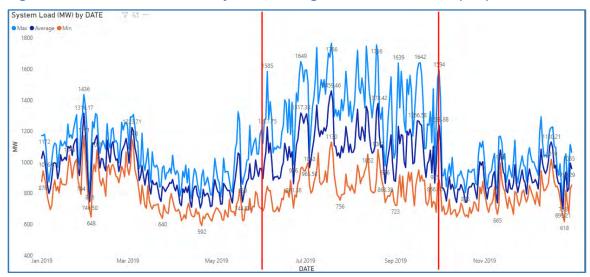


Figure 4: 2019 Missouri Metro Daily Peak, Average and Minimum Loads(MW)



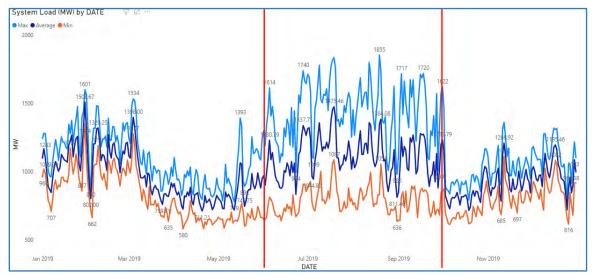


Figure 6: 2019 Evergy High Load Days

6.12319 6756 6161 6578 6980 7144 7207 7580 7520 7145 7774 7516 6920 6306 577 6867 8980 7187 7080 7180 8981 6157 7080 7180 8981 6157 7080 7180 8981 6157 7081 7881 7880 8981 7174 717 6226 6146 6146 6146 6146 6146 6146 6146	DATE	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
6.7 (20) (20) (20) (20) (20) (20) (20) (20)																5772
622019																5872
6.25.019																5667 6327
6242019 6875 6418 6904 7357 7780 8118 8394 6868 8377 8575 818 0942 7651 7414 6902 024 642019 7078 7022 8127 8847 8882 9071 9155 9252 9979 8907 8575 8185 7928 7358 67 8452 8914 8002 0249 9024 9038 9039 8035 8048 6851 7416 8020 024 642019 7075 7075 7078 7022 8127 8847 8922 9031 8032 9039 8033 8045 8042 8051 7032 9024 9033 9039 8031 8042 8031 74021 7075 9031 9031 9031 9031 9031 9031 9031 9031																5129
6212019 7076 7082 8127 8647 8802 9071 9185 9252 9079 8807 875 8185 7926 7385 67 6222019 8006 7525 8132 8573 8914 9122 9281 9348 9330 8194 8837 8394 8131 7021 70 6222019 8006 7165 7756 8083 8385 8624 8808 9148 813 9330 8194 8137 7021 70 6202019 6067 7165 7758 8083 8385 8624 8808 914 8185 1560 8194 7785 7218 718 712219 7110 740 8102 8486 8830 9000 9197 9296 9286 9122 9776 8331 8015 738. 66 7122019 7110 7187 7551 7802 8182 8059 3058 3835 8058 1050 8710 824 7810 7382 86 7122019 6731 7187 7551 7802 8182 8030 8356 8276 8148 7875 7452 77019 6790 6386 56 7122019 6731 7187 7551 7802 8182 8030 8030 8775 8510 8710 8727 8728 8728 8728 8728 8728 8728 872																6128
CACADID 7295 7997 6441 8902 2944 922 9718 9742 9821 9330 946 837 837 7745 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 774 77		6258		7031	7389	7782				8525	8367		7651		6920	6294
60000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000 7000																6716
																7176 7050
17.10 17.10 7.10 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6.70 6																6543
73 (1919) 6731 17187 7551 7902 8182 8004 8336 8276 8148 7875 7452 7019 6790 6398 587 776 7019 8122 6200 8358 8268 7978 7546 6278 587 772019 5815 8372 6874 7320 7676 7919 8122 6200 8358 8268 7978 7546 7243 6718 671 732019 6862 7531 8107 6862 9074 9428 9675 8004 9817, 9860 9383 8977 6835 8016 737 71002019 6824 7531 8107 6862 9074 9428 9675 8004 9817, 9860 9383 8977 6835 8016 737 71002019 6834 6769 6983 7327 7702 8119 8422 8664 8675 8089 8938 9977 6835 8016 737 71002019 6345 6790 7175 7531 7682 8119 8309 8430 8425 8263 7852 7460 7194 6547 7511 7400 740 8478 8422 8509 8878 7811 8277 8653 8199 7782 7480 7490 8424 8509 8487 8731 8272 8653 8199 7782 7480 7490 8424 8509 8487 8731 8272 8653 8199 7782 7480 7490 8424 8509 8487 8731 8272 8653 8199 7822 7480 7490 8424 8509 8487 8731 8272 8653 8199 7822 7480 7490 8424 8509 8478 8489 8498 8498 8498 7478 7478 747																6699
T42,019 5000 6132 6555 6916 7254 7311 7741 7890 7833 7511 7257 6973 6976 6278 567 732,019 6056 7553 7898 8336 8546 8068 8399 8903 8973 8656 8356 7971 7708 7100 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740 740																6681
T12,019 6916 6372 6974 7320 7676 7918 8122 6220 8356 8260 7976 7743 6718 7100 713,019 6962 7531 8107 6662 9074 9426 9675 8964 9817 9660 9838 8977 8635 8016 737 7100019 6944 6796 7715 7531 7882 8119 8309 8421 8426 8425 8426 8425 7425 7445 7256 8670 8671 712019 6445 6456 6457 7370 7752 8119 8420 8425 8644 8675 8683 8752 7460 7119 6547 5541 712019 6412 6426 6426 7420 7420 7400 7404 7420 8424 8597 8679 7571 7727 6658 8490 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 7420 74																5906
79.2019 6966 7553 7988 8336 846 8865 8839 6903 8973 8956 8916 770 79.2019 6934 6769 6933 1377 8972 9974 9926 9975 8904 9917 6960 9338 9977 8935 8916 73 71.12019 6934 6769 6933 7370 7702 8119 8422 8564 8575 8438 8153 7545 7253 6970 6971 71.12019 6435 6920 7370 7372 8142 8397 8587 8711 8727 8663 8819 7382 7380 6736 671 71.12019 6435 6920 7370 7372 8142 8397 8587 8711 8727 8663 8190 7382 7388 6736 731 71.12019 6436 6769 6937 7400 7994 8242 8560 8716 8872 8919 8738 8545 8716 7376 8919 827 71.12019 6581 7020 7522 7872 8175 8383 9027 9085 9969 9000 8754 8337 6867 7716 731 71.12019 7639 8171 8869 9067 9119 8706 9922 10089 9099 9000 8754 8337 6867 7411 6871 711 712019 7639 8171 8869 9067 9119 8706 9922 10089 10118 10027 9710 9285 8394 8318 787 712019 7720 9019 9159 9985 907171 10339 10389 10122 8909 8384 9073 8869 7718 82019 7720 9019 9399 8542 9019 9159 9985 907171 10339 10389 10122 8909 8384 9073 8869 7720 9019 9390 8542 9019 9159 9985 907171 10339 10389 10380 91022 8909 8384 9073 8869 7720 9019 9390 8542 9019 9359 9985 907171 10339 10389 10380 9738 9738 973 973 973 973 973 973 973 973 973 973																5823 6161
711/2019 6934 6769 6963 7327 7702 8198 8422 8664 8575 8438 8153 7645 7253 6670 650 711/2019 6436 6920 7370 7752 8142 8397 8687 8731 8727 8663 8190 7692 7306 6735 681 711/2019 6436 6920 7204 7080 7929 8206 8418 8569 857 8480 8186 7716 7203 6891 627 714/2019 6278 6937 7400 7094 8242 8509 8716 8872 8691 8733 8465 8097 7851 7717 6811 627 714 7207 7502 7502 8728 8498 8972 8919 8733 8465 8097 7851 7717 6811 627 714 7207 7502 7502 8728 8480 8927 8919 8733 8465 8097 7851 7717 6811 627 714 7207 7502 8728 875 8351 8919 8793 8546 8097 7851 7717 6811 627 714 7207 7502 8728 875 8351 8919 8793 8546 8097 7851 7717 6811 627 714 7207 7502 8728 875 8351 8919 8793 8949 8909 9000 8734 8337 8056 7491 8828 872 8919 8733 8465 8097 8551 7417 8551 8728 875 8351 8919 8733 8465 8097 8551 7417 8551 8728 8728 8728 8728 8728 8728 8728 872	7/8/2019															6483
																7335
1132019 6435 6920 7370 7752 8142 8397 8687 8731 8127 8683 8190 7682 7306 6735 6811 627 6185 7716 7204 7089 7292 8206 8116 8698 8697 8480 8185 7716 7717 7617 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517 7517																6017
1142019 6126 6897 7490 7502 8206 8418 8569 6807 8400 8185 7716 7370 6891 278 1142019 6591 7029 7502 7872 8176 8381 8493 6590 8510 8349 8049 7385 7348 7717 6891 780 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 7810 781																5924 6117
711-2019 6811 7029 7502 7872 8175 8361 8493 8690 8510 8349 8095 7861 7177 68 716-2019 6817 7091 7567 8083 8578 8883 9027 9033 9099 9000 8734 8337 8058 7491 68 717-2019 7809 8171 8854 9087 9419 9709 9962 0009 10116 10022 9908 9384 9077 8486 77 718-2019 7809 8171 8854 9087 9419 9709 9962 0009 10116 10022 9908 9384 9077 8486 77 718-2019 7809 8542 9019 9459 9885 10177 10339 10338 10301 10158 9702 9337 9005 8417 767 717-2019 7809 8542 9019 9459 9885 10177 10339 10338 10301 10158 9702 9337 90058 8417 767 717-2019 7409 8001 8461 8874 9220 9551 9760 9920 9953 9976 9477 9054 8761 8232 776 717-2019 5942 6393 8846 7054 7290 7579 7787 7824 7845 7737 7324 6992 6666 6175 56 717-2019 5942 6393 8846 7054 7290 7579 7787 7824 7845 7737 7324 6992 6666 6175 56 717-2019 5834 6215 6545 6883 7208 7459 7707 7813 7769 7887 7787 7824 7845 7000 8666 6105 56 718-2019 6171 6836 7042 7425 7788 8083 8300 8424 8398 8112 7691 7222 6900 6656 6100 54 718-2019 6171 6836 7749 6250 6779 7701 7491 7779 7920 8092 8109 7891 7711 7825 6800 6393 58 718-2019 6855 7367 77820 8181 8547 8754 8888 8931 8889 8898 829 8898 8294 7771 7470 6844 625 718-2019 6259 8812 7264 7701 8079 8338 8888 8821 8880 8898 8295 87804 7747 6864 665 881 7792 8000 8266 8408 8224 8787 771 771 7826 6806 6175 868 877019 629 8812 7264 7701 8079 8338 8888 8822 8852 8886 8295 78804 77470 6844 625 887019 7786 8780 8888 8831 8889 8898 8898 8898 8898 8898																6281
11	7/14/2019	6278	6937	7490	7904	8242	8509	8716	8872	8919	8793	8545	8087	7851	7177	6526
7112/2019 7894 8456 8864 9017 9795 9897 10186 10186 10189 10192 9808 3937 8318 76 7112/2019 7896 8542 9019 9458 9885 10171 10330 10330 10301 10158 9792 9337 9035 8471 78 712/2019 7890 8542 9019 9458 9885 10171 10330 10330 10301 10158 9792 9337 9035 8471 78 712/2019 5942 6333 6846 7054 7250 7579 7787 7824 7849 7894 777 3724 6992 6666 6175 56 712/2019 6295 6677 7004 7249 7489 7684 7864 7873 77324 6992 6666 6175 57 712/2019 6295 6677 7004 7249 7489 7684 7864 7873 77324 6992 6666 6175 58 712/2019 6295 6675 6545 6883 7208 7454 7695 7884 7993 7784 7445 7003 6666 1010 58 712/2019 6008 6460 6870 7228 7559 7770 7813 7769 7897 7897 7897 7897 7897 7897 7897																6111
T112/2019 7890 8542 9019 9459 9885 10171 10338 10381 10301 10158 9792 9377 9055 8471 787 7702 7919 7420 8001 8461 8874 9220 8555 9760 8920 9963 9796 9477 9054 6761 8232 76 7702 7019 7420 8001 8461 8874 9220 8555 9760 8920 9963 9796 9477 9054 6761 8232 76 7702 7004 7749 7498 6464 7602 7604 7609 7604 7730 7732 7324 6992 6966 6175 566 7724 72019 5694 6393 6265 6677 7004 7749 7498 646 7602 7604 7930 7764 7445 7003 6866 6100 54 7242 7498 6664 7602 7604 7930 7764 7445 7003 6866 6100 54 7252 7604 7609 7604 7609 7604 7730 7744 7745 7767 7761 7767 7579 7764 7769 7764 7744 7769 7607 7744 7745 7768 7724 7769 7769 7774 7744 7774 7767 7764 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769 7769																6833 7671
T1-2019																7844
T-12 2019 5942 6393 6846 7054 7290 7579 7787 7924 7954 7737 7324 6992 6866 6175 586 5720 7004 7249 7498 7468 7695 7864 7833 7784 7445 7003 6665 6100 54 7722 7499 7469 7695 7884 7830 7784 7445 7003 6665 6100 54 7722 7499 7469 7695 77884 7830 7784 7445 7003 6665 6100 54 7722 7499 7498 7495 7788 7838 7789 7734 77118 6849 6876 6201 56 7722 7499 6260 6717 6636 6704 7245 7766 7898 7809 7809 7818 8412 7691 7726 6908 6393 58 7722 72019 5749 6250 6719 7106 7461 7719 7920 8092 8192 7961 7613 7176 7466 6965 7367 7820 8181 8547 8754 8888 8931 8889 8696 8294 7678 7256 6571 58 6571 7502 7688 6427 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 7674 767																7875
Total Color Colo																7625
Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell Tell																5651
\$\frac{725019}{7262019}																5358 5499
7.28 2019 5649 6250 6719 7106 7461 7719 7920 8092 8109 7861 7613 7174 6820 6483 58 7.28 2019 5884 6427 6874 7464 7811 8097 8318 8431 8466 6297 8010 7716 7466 6965 63 7.29 2019 6855 7367 7820 8181 8547 8754 8888 8931 8899 8696 6294 7678 7256 6571 570 720 720 720 720 720 720 720 720 720 7																5665
T282019		6171		7042				8300	8424	8396				6908	6393	5847
7/39/2019 6855 7367 7820 8181 8547 8754 8888 8931 8889 8866 8294 7678 7256 6671 5673 730/2019 6289 6812 7264 7701 8079 8393 8656 8622 8852 8868 829 8739 7771 7451 7440 6884 688 7312 7312/2019 6281 6840 7013 7403 7811 8122 8247 8197 8071 7900 7599 7375 7155 6666 6840 7264 77768 6865 7718 7791 8040 8195 8279 8154 7828 7487 7164 6567 588 52019 6660 7284 77786 8198 8537 8769 8924 8929 8802 8599 8235 7924 7618 6972 638 6364 6650 6367 7229 7612 7971 8170 8227 8111 7833 7505 7191 6566 588 82019 5948 6105 6317 6542 6930 7247 7571 7849 7993 7874 7574 7270 6960 6387 6382 8992 8929 8802 8599 8802 7899 8802 7899 8802 7899 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7892 7																5937
7/31/2019 6:29 6:812 7:264 7701 8079 8:333 8:568 8:622 8:52 8:566 8:295 7:804 7:470 6:844 6:02 7:31/2019 6:261 6:640 7013 7:403 7:811 8:122 8:247 8:197 8:071 7:900 7:599 7:375 7:155 6:666 6:158 7:101 7:255 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:755 7:																6372 5908
\$\frac{11}{2019} \text{eff} \text{eff} \text{eff} \text{eff} \text{eff} \text{eff} \text{eff} \text{eff} \text{eff} \text{eff} \text{eff} \text{eff} \text{eff} \text{eff} \text{eff} \text{eff} \text{eff} \text{eff} \text{eff} eff																6222
8.4/2019												7771				6045
8.6.2019 7164 7788 8378 8863 9273 9526 9579 9492 8802 8589 8235 7924 7618 6972 638 802019 7164 7788 8378 8863 9273 9526 9579 9492 9346 9152 8767 8276 7845 7163 64 8872019 6282 6444 6653 6955 7229 7612 7971 8170 8227 8131 7833 7505 7191 6566 595 8.8.2019 5948 6105 6317 6542 6930 7247 7571 7849 7993 7874 7574 7270 6960 6387 58 8.8.2019 6245 6728 7154 7611 7928 8193 8369 8451 8400 8192 7849 7508 7207 6677 61 810 2019 6071 6663 7152 7500 7746 8006 8189 2298 8353 8310 8022 7756 7490 7016 65 811/2019 5794 6075 6431 6820 7222 7664 8042 8254 8448 8395 8160 7961 7712 7187 66 811/2019 7117 7730 8350 8930 9458 9830 10018 9994 9994 9994 9906 8868 8109 7637 6953 62 814/2019 6435 6864 7317 7728 8097 8366 8548 8647 8645 8427 7983 7568 7095 6384 57 815/2019 6000 6510 6918 7422 7779 8093 8267 8318 8296 8149 7837 7608 7223 6509 581/2019 5367 5773 6123 6479 6862 7241 7645 7966 8163 8109 7637 7608 7223 6509 581/2019 5323 5689 6209 6782 7300 77777 8158 849 5920 849 720 8930 909 837 868 8197 637 6704 682 811/2019 5323 5689 6209 6782 7300 7777 8158 8496 8103 8103 7768 7499 7410 6435 8232 6899 6209 6782 7300 7777 8158 845 845 845 845 845 845 845 845 845 8																6139
8.6/2019 7164 7788 8378 8863 9273 9526 9579 9492 9346 9152 8757 8276 7845 7163 648 87/2019 6282 6444 6653 6955 7229 7612 7971 8170 8227 8131 7833 7505 7191 6566 55 88/2019 5948 6105 6317 6642 6930 7247 7571 7849 7993 7874 7574 7270 6906 6387 88/2019 6245 6728 7154 7611 7928 8193 8369 8451 8400 8192 7649 7508 7207 6677 61 810/2019 6071 6663 7152 7500 7746 8006 8189 8299 8353 8310 8022 7758 7490 7016 66 811/2019 5794 6075 6431 6820 7222 7664 8042 8254 8448 8395 8160 7961 7712 7187 66 81/2019 7117 7730 8350 8930 9458 9830 10018 9994 9954 9970 9301 8977 8562 7891 71 841/2019 7293 7868 8388 8765 9140 9379 9476 9452 9326 9056 8586 8109 7637 6953 62 814/2019 6090 6510 6918 7422 7779 8093 267 8318 2296 8149 7837 7608 7223 6509 68816/2019 6118 6444 6705 6930 7145 7178 7375 7708 7854 7754 7439 7182 6909 6428 58816/2019 5307 5773 6123 6479 6862 7241 7645 7966 8163 8108 7768 7439 7180 6704 628 818/2019 5323 5689 6209 6782 7330 7778 158 8445 8992 8903 9671 9403 9099 9675 7928 821/2019 6090 650 6880 7236 6761 9780 7781 7815 8909 7816 9780 9780 9780 9780 9780 9780 9780 9780																5943
8/7/2019 6282 6444 6663 6955 7229 7612 7971 8170 8227 8131 7833 7505 7191 6566 59 8/8/2019 5948 6105 6317 6542 6930 7247 7571 7849 7993 7874 7574 7270 6960 6387 58 8/9/2019 6245 6728 7154 7611 7928 8193 8369 8451 8400 8192 7849 7508 7207 6677 61 8/10/2019 6071 6663 7152 7500 7746 8006 8189 8298 3353 8310 8022 7758 7490 7016 65 8/11/2019 5794 6075 6431 6820 7222 7664 8042 8254 8448 8395 8160 7961 7712 7187 66 8/11/2019 7117 7730 8350 8930 9458 9830 10018 9994 9954 9720 9301 8977 8582 7899 711 8/13/2019 7193 7868 8388 8785 9140 9379 9476 9452 9326 9056 8586 8109 7637 6953 62 8/14/2019 6435 6864 7317 7728 8097 8366 8548 8647 8645 8427 7983 7568 7095 6384 57 8/15/2019 6090 6510 6918 7422 7779 8093 267 8318 8296 8149 7837 7608 7223 6509 58 8/16/2019 6118 6444 6705 6930 7145 7178 7375 7708 7854 7754 7439 7182 6909 6428 58 8/18/2019 5323 5689 6209 6782 7300 7777 8158 8445 8592 8491 8153 7819 7416 6787 61 8/19/2019 6924 7565 8250 8853 9383 9771 10031 10174 10186 9992 9608 9307 8386 8091 74 8/19/2019 6824 7565 8250 8853 9383 9771 10031 10174 10186 9992 9608 9307 8386 8091 74 8/19/2019 6546 6860 7236 7617 7873 8442 8768 8997 9146 9139 8941 8153 7819 7416 6787 61 8/19/2019 6546 6860 7236 7617 7873 8442 8768 8997 9146 9139 8941 8544 8247 7528 6700 58 8/19/2019 6646 6860 7236 7617 7873 8442 8768 8997 9146 9139 8941 8544 8247 7528 6700 59 9/12/2019 6468 6705 7589 8145 8638 9063 3364 8379 8351 8070 7640 7354 6887 6205 55 9/12/2019 6524 6786 6705 7589 8145 8638 9063 3364 9841 8544 8247 7528 6700 59 9/12/2019 6526 6796 7740 7873 8442 8768 8997 9146 9139 8941 8544 8247 7528 6700 59 9/12/2019 6526 6896 7728 7771 7873 8442 8768 8997 9146 9139 8941 8544 8247 7528 6700 59 9/12/2019 6526 6896 7728 7579 7911 8297 8482 8010 7922 7676 7331 7731 6754 6203 56 9/12/2019 6526 6896 7728 7579 7911 8297 8482 8010 8487 8305 8300 7792 7347 6796 6393 7425 6650 6488 6395 8797 8927 8949 8815 8531 8163 7920 7454 6860 633 9/12/2019 6526 6896 7747 7873 8442 8768 8997 9146 8138 8871 8870 7794 7792 7347 6774 6774 6774 6774 6774 6774 6774																6374 6496
8.19.2019 6245 6728 7154 7611 7928 8193 8369 8451 8400 8192 7849 7508 7207 6677 618 810.2019 6071 6663 7152 7500 7746 8006 8189 8298 8353 8310 8022 7758 7490 7016 668 811.2019 5794 6075 6431 6820 7222 7664 8042 8254 8448 8395 8160 7961 7712 7187 66 811.2019 7117 7730 8350 8930 9458 9830 10018 9994 9954 9720 9301 8977 8582 7891 71 813.2019 7293 7868 8388 8785 9140 9379 9476 9452 9326 9056 8586 8109 7637 6953 62 814.2019 6435 6864 7317 7728 8097 8366 8548 8647 8645 8427 7963 7568 7095 6384 57 81.52019 6090 6510 6918 7422 7779 8093 8267 8318 8296 8149 7837 7608 7223 6509 58 8162019 6118 6444 6705 6930 7145 7178 7375 7706 7854 77439 7182 6909 6428 58 81672019 5367 5773 6123 6479 6862 7241 7645 7966 8163 8108 7768 7439 7180 6704 62 818.2019 5232 5689 6209 6782 7300 7777 8158 8445 8592 8491 8153 7819 7416 6787 61 819.2019 6924 7585 8250 8853 9383 9771 10031 10174 10186 9992 9606 9307 8836 8091 748 820.2019 7555 8092 8423 8713 9125 9507 9736 9918 9938 9761 9403 9099 8675 7928 72 82.212019 6614 6860 7236 7611 7869 7960 7982 8010 7922 7676 7391 7311 6754 6203 58 829.2019 5335 6926 7477 7873 8442 8768 8997 9146 9138 8914 8544 8247 7528 6700 59 91.22019 5140 5718 6306 6880 7336 7727 8011 8257 8349 8135 7736 7489 7019 6391 5789 8145 8638 9963 3364 9533 3474 9199 8796 8515 7963 7245 59 91.22019 6650 7085 7599 8145 8638 9909 307 8836 8091 772 91.22019 6523 6782 7370 7386 8479 8899 9176 9314 9318 8941 8544 8247 7528 6700 59 91.22019 6526 8706 7789 7787 8849 8899 9176 9314 9318 8941 8544 8247 7528 6700 59 91.22019 6568 7085 7589 8145 8638 9908 3364 9533 3474 9199 8796 8515 7963 7245 65 91.22019 6520 6895 7228 7376 7386 8879 8899 9176 9314 9242 8962 8953 8228 7737 7038 63 91.92019 6520 6895 7228 7376 7386 8879 8899 9176 9314 9242 8962 8532 8228 7737 7038 63 91.92019 6520 6895 7228 7579 7911 8297 8482 8560 8485 8305 7607 7400 7454 6860 63 91.02019 6520 6895 7228 7579 7911 8297 8482 8560 8485 8305 8308 7794 7997 7394 7394 6698 600 7770 7304 7865 8430 8876 9142 9303 9331 9142 8844 8688 8229 7706 7707 7304 7865 8430 8876 9142 9303																5962
8/10/2019 6071 6663 7152 7500 7746 8006 8189 8298 8353 8310 8022 7758 7490 7016 658 8/11/2019 5794 6075 6431 6820 7222 7664 8042 8254 8448 8395 8160 7961 7712 7187 68 812/2019 7117 7730 8350 8930 9458 9830 10018 994 9956 8930 9978 9830 10018 9994 9956 8566 8109 7637 6953 62 8/1/2019 6435 6884 7317 7728 8097 8366 8548 8647 8645 8427 7983 7568 7095 6384 57 8/1/2019 6316 6444 6705 6930 7145 7178 7377 7708 7854 7754 7439 7180 6909 6428 58 817/2019 6367 5773 6123																5827
8/11/2019 5794 6075 6431 6820 7222 7664 8042 8254 8448 8395 8160 7961 7712 7187 668 8/12/2019 7117 7730 8350 8930 9458 9830 10018 9994 9954 9720 9301 8977 8582 7891 71 8/13/2019 7293 7868 8388 8785 9140 9379 9476 9452 9326 9056 8586 8109 7376 6953 622 8/14/2019 6435 6864 7317 7728 8097 8366 8548 8645 8427 7983 7568 7095 6384 578 815/2019 6090 6510 6918 7422 7779 8093 3267 8318 8296 8149 7837 7608 7223 6609 58 8/12/2019 5367 5673 6123 6479 6862 7241 7645 7966																6172
8/12/2019 7117 7730 8350 8930 9458 9830 10018 9994 9954 9720 9301 8977 8582 7891 71 8/13/2019 7293 7868 8388 8785 9140 9379 9476 9452 9326 9056 8586 8109 7637 6953 628 8/14/2019 6435 6864 7317 7728 8097 8366 8648 8647 8645 8427 7983 7568 7095 6384 578 8/15/2019 6090 6510 6918 7422 7779 8093 3267 8318 8296 8149 7837 7608 7223 6609 682 8/17/2019 5325 5673 6123 6479 6862 7241 7645 7966 8163 8108 7789 7439 7182 6909 6428 59 8/18/2019 5323 5689 6220 6782 7300																6533 6641
8/13/2019 7293 7868 8388 8785 9140 9379 9476 9452 9326 9056 8586 8109 7637 6953 622 8/14/2019 6435 6864 7317 7728 8097 8366 8548 8647 8645 8427 7983 7568 7095 6384 58 8/15/2019 6118 6444 6705 6930 7145 7178 7708 7754 7439 7182 6909 6428 58 8/17/2019 5367 5773 6123 6479 6862 7241 7645 7966 8163 8108 7768 7439 7180 6704 62 8/18/2019 5323 5689 6209 6782 7300 7777 8158 8445 5592 8491 8153 7819 7416 6787 61 8/19/2019 7555 8092 8423 8713 9125 9507 9738 9918 9938																7171
815/2019 6090 6510 6918 7422 7779 8093 8267 8318 8296 8149 7837 7608 7223 6509 58 8/16/2019 6118 6444 6705 6930 7145 7178 7375 7708 7854 7754 7499 7180 6090 6428 59 8/17/2019 5323 5689 6209 6782 7300 7777 8158 8445 8592 8491 8153 7819 7416 6787 61 819/2019 6924 7565 8250 8853 9383 9771 10031 10174 10186 9992 9608 9307 8386 8091 74 820/2019 7553 8092 8423 8713 9125 9507 9736 9918 9938 9761 9403 9099 8675 7928 723 8712019 6614 6860 7236 7611 7801 793 9918 9914 9138																6266
8/16/2019 6118 6444 6705 6930 7145 7178 7375 7708 7854 7754 7439 7182 6909 6428 598 8/17/2019 5367 5773 6123 6479 6862 7241 7645 7966 8163 8108 7768 7439 7180 6704 62 8/18/2019 5323 5689 6209 6782 7300 7777 8158 8445 8592 89153 7819 7416 6787 61 8/19/2019 6924 7565 8250 8853 9383 9771 10031 10174 10186 9992 9608 9307 8836 8091 74 8/21/2019 6614 6860 7236 7611 7869 7900 7982 8010 7922 7676 7391 7311 6754 6203 56 8/21/2019 6314 5718 6306 6880 7336 7727 8011																5736
8/17/2019 5367 5773 6123 6479 6862 7241 7645 7966 8163 8108 7768 7439 7180 6704 62 8/18/2019 5323 5689 6209 6782 7300 7777 8158 8445 8592 8491 8153 7819 7416 6787 61 8/19/2019 6924 7553 8052 8853 9383 9771 10031 10174 10186 9992 9608 9307 8366 8091 74 8/20/2019 7553 8092 8423 8713 9125 9507 9736 9918 9938 9761 9403 9099 8075 7928 722 8011 7403 9918 9938 9761 9403 9099 8075 7928 722 7676 7391 7131 6754 6203 58 821/2019 6418 8600 7336 7727 8011 8257 8349 8135																5883 5964
818/2019 5323 5689 6209 6782 7300 7777 8158 8445 8592 8491 8153 7819 7416 6787 61 819/2019 6924 7565 8250 8863 9383 9771 10031 10174 10186 9992 9608 9307 8836 8091 74 8/20/2019 7653 8092 8423 8713 9125 9507 9736 9918 9938 9761 9403 9099 8675 7928 728 728 722 7676 7391 7131 6754 6203 56 8/21/2019 6335 6926 7477 7873 8442 8768 8997 9146 9138 8941 8544 8247 7528 6700 59 9/2/2019 5140 5718 6306 6800 7336 7727 8011 8257 3349 8135 7879 7919 6919 793/2019 6668 7085 7916																6227
8/20/2019 7553 8092 8423 8713 9125 9507 9736 9918 9938 9761 9403 9099 8675 7928 72 8/21/2019 6614 6860 7236 7611 7869 7960 7982 8010 7922 7676 7391 7131 6754 6203 58 8/29/2019 6340 5718 6306 6880 7336 7727 8011 8257 8349 8135 7736 7489 7019 6391 57 8941 8544 8947 7528 6700 58 9/2/2019 6568 7085 7589 8145 8638 9063 9364 9533 9474 9199 8796 8515 7963 7245 65 9/4/2019 6228 6580 6961 7355 7710 8017 8238 8379 8351 8706 7840 7963 7245 65 9/5/2019 6234 6792 7347 7906	8/18/2019				-					8592						6176
8/21/2019 6614 6860 7236 7611 7869 7960 7982 8010 7922 7676 7391 7131 6754 6203 568 8/29/2019 6335 6926 7477 7873 8442 8768 8997 9146 9138 8941 8544 8247 7528 6700 59 9/2/2019 5140 5718 6306 6880 7336 7727 8011 8257 8349 8135 7736 7489 7019 6391 57 9/3/2019 6568 7065 7569 8145 8638 9063 3364 9533 3474 9199 8796 8515 7963 7245 66 896 6961 7355 7710 8017 8238 8379 8351 8070 7640 7354 6887 6205 55 9/5 9/5 9/5 9/5 9/6 2019 6478 6907 7402 7844 8223 8471<																7441
8/29/2019 6335 6926 7477 7873 8442 8768 8997 9146 9138 8941 8544 8247 7528 6700 58 9/2/2019 5140 5718 6306 6880 7336 7727 8011 8257 8349 8135 7736 7489 7019 6391 57 9/3/2019 6528 6580 6961 7355 7710 8017 8238 8379 8351 8070 7640 7354 6887 6205 55 9/5/2019 6224 6792 7347 7906 8479 8899 9176 9314 9242 8962 8532 8228 7737 7038 63 9/5/2019 6478 6907 7402 7844 8223 8471 8618 8645 8478 8051 7509 7152 6675 6115 55 9/7/2019 5327 5801 6295 6779 7210 7620 <th< td=""><th></th><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>7225 5695</td></th<>																7225 5695
9/2/2019 5140 5718 6306 6880 7336 7727 8011 8257 8349 8135 7736 7489 7019 6391 57 9/3/2019 6568 7085 7589 8145 8638 9063 9364 9533 9474 9199 8796 8515 7963 7245 66 9/4/2019 6228 6580 6961 7355 7710 8017 8238 8379 8351 8070 7640 7354 6887 6205 55 9/5/2019 6234 6792 7347 7906 8479 8899 9176 9314 9242 8962 8532 8228 7737 7038 63 9/6/2019 6478 6907 7402 7844 8223 8471 8616 8645 8478 8051 7509 7152 6675 6115 55 9/7/2019 5327 5801 6295 6779 7210 7620 7902 8091 8098 7860 7460 7199 6767 6291 58 9/9/2019 6650 7209 7726 8172 8569 8797 8927 8949 8815 8531 8163 7920 7454 6860 6805 910/2019 6520 6895 7228 7579 7911 8297 8482 8560 8458 8305 8009 7792 7347 6774 61 9/11/2019 6878 7373 7822 8280 8724 9071 9243 9294 9196 8837 8377 8061 7594 6943 63 9/14/2019 5059 5515 5987 6468 6956 7374 7688 7915 7906 7667 7313 7074 6715 6293 58 9/15/2019 6781 6382 6960 7510 7961 8303 8570 8698 8701 8441 8078 7794 7299 6698 60 9/16/2019 6427 6962 7515 8030 8472 8737 8882 8950 8829 8451 8048 7744 7250 6659 59 9/15/2019 6427 6962 7515 8030 8472 8737 8882 8950 8828 8451 8048 7744 7250 6659 59 9/18/2019 6498 7073 7665 8219 8643 8903 9059 9163 9032 8714 8274 7892 7330 6676 60																5986
9.44.2019 6228 6580 6961 7355 7710 8017 8238 8379 8351 8070 7640 7354 6887 6205 555 95.5019 6234 6792 7347 7906 8479 8899 9176 9314 9242 8962 8532 8228 7737 7038 63 9.64.2019 6478 6907 7402 7844 8223 8471 8616 8645 8478 8051 7509 7152 6675 6115 55 97.7019 5327 5801 6295 6779 7210 7620 7902 8091 8098 7860 7460 7199 6767 6291 58 9.7019 6650 7209 7726 8172 8569 8797 8927 8949 8815 8531 8163 7920 7454 6860 63 910.2019 6520 6895 7228 7579 7911 8297 8482 8560 8485 8305 8009 7792 7347 6774 61 91.12019 6878 7373 7622 8280 8724 9071 9243 9294 9196 8837 8377 8061 7594 6943 63 914.2019 5055 5515 5967 6468 6956 7374 7688 7915 7906 7667 7313 7074 6715 6293 58 915.2019 5781 6382 6960 7510 7961 8303 8570 8698 8701 8441 8078 7794 7299 6698 60 916.2019 6707 7304 7885 8430 8876 9142 9303 9331 9142 8848 8569 8229 7706 7007 8915 911.2019 6427 6962 7515 8030 8472 8303 8370 8698 8701 8441 8078 7794 7299 6698 60 916.2019 6707 7304 7885 8430 8876 9142 9303 9331 9142 8848 8569 8229 7706 7007 63 911.2019 6427 6962 7515 8030 8472 8737 8882 8950 8829 8451 8048 7744 7250 6559 5918.2019 6498 7073 7665 8219 8643 8903 9059 9163 9032 8714 8274 7892 7330 6676 80																5788
9/5/2019 6234 6792 7347 7906 8479 8899 9176 9314 9242 8962 8532 8228 7737 7038 63 9/6/2019 6478 6907 7402 7844 8223 8471 8616 8645 8478 8051 7509 7152 6675 6115 55 9/7/2019 5327 5801 6295 6779 7210 7620 7902 8091 8098 7860 7460 7199 6767 6291 58 9/9/2019 6650 7209 7726 8172 8569 8797 8927 8949 8815 8531 8163 7920 7454 6860 63 9/10/2019 6520 6895 7228 7579 7911 8297 8482 8560 8485 8305 8009 7792 7347 6774 61 9/11/2019 6878 7373 7822 8280 8724 9071 9243 9294 9196 8837 8377 8061 7594 6943 63 9/14/2019 5059 5515 5987 6488 6956 7374 7688 7915 7906 7667 7313 7074 6715 6293 58 9/15/2019 5781 6382 6960 7510 7961 8303 8570 8698 8701 8418 8078 7794 7299 6698 80 9/16/2019 6707 7304 7885 8430 8876 9142 9303 9331 9142 8884 8569 8229 7706 7007 63 9/17/2019 6427 6962 7515 8030 8472 8737 8882 8950 8829 8451 8048 7744 7250 6559 59 9/18/2019 6498 7073 7665 8219 8643 8903 9059 9163 9032 8714 8274 7892 7330 6676 60																6563
9/6/2019 6478 6907 7402 7844 8223 8471 8616 8645 8478 8051 7509 7152 6675 6115 555 97/2019 5327 5801 6295 6779 7210 7620 7902 8091 8099 7860 7460 7199 6767 6291 58 9/9/2019 6650 7209 7726 8172 8569 8797 8927 8949 8815 8531 8163 7920 7454 6860 639 9/10/2019 6520 6895 7228 7579 7911 8297 8482 8560 8465 8305 8009 7792 7347 6774 61 9/11/2019 6878 7373 7822 8280 8724 9071 9243 9294 9196 8837 8377 8061 7594 6943 63 9/14/2019 5059 5515 5987 6468 6956 7374 7688 7915 7906 7667 7313 7074 6715 6293 58 9/15/2019 5781 6382 6960 7510 7961 8303 8570 8698 870 8441 8078 7794 7299 6698 60 9/16/2019 6707 7304 7885 8430 8876 9142 9303 9331 9142 8848 8569 8229 7706 7007 63 9/17/2019 6427 6962 7515 8030 8472 8737 8882 8950 8829 8451 8048 7744 7250 6559 59 9/18/2019 6498 7073 7665 8219 8643 8903 9059 9163 9032 8714 8274 7892 7330 6676 60																5590
9/7/2019 5327 5801 6295 6779 7210 7620 7902 8091 8098 7860 7460 7199 6767 6291 58 9/9/2019 6650 7209 7726 8172 8569 8797 8927 8949 8815 8531 8163 7920 7454 6880 63 9/10/2019 6520 6895 7228 7579 7911 8297 8482 8560 8485 8305 8009 7792 7347 6774 61 9/11/2019 6878 7373 7822 8280 8724 9071 9243 9294 9196 8837 8377 8061 7594 6943 63 9/14/2019 5059 5515 5987 6468 6956 7374 7688 7915 7906 7667 7313 7074 6715 6293 58 9/15/2019 5781 6382 6960 7510 7961 8303 8570 8698 8701 8441 8078 7794 7299 6698 60 9/16/2019 6707 7304 7885 8430 8876 9142 9303 9331 9142 8848 8569 8229 7706 7007 63 9/17/2019 6427 6962 7515 8030 8472 8737 8882 8950 8829 8451 8048 7744 7250 6559 59 9/18/2019 6498 7073 7665 8219 8643 8903 9059 9163 9032 8714 8274 7892 7330 6676 60																6368 5533
9/19/2019 6650 7209 7726 8172 8569 8797 8927 8949 8815 8531 8163 7920 7454 6860 63 9/10/2019 6520 6895 7228 7579 7911 8297 8482 8560 8485 8305 8009 7792 7347 6774 61 9/11/2019 8878 7373 7822 8280 8724 9071 9243 9294 9196 8837 8377 8061 7594 6943 63 9/14/2019 5059 5515 5967 6468 6956 7374 7688 7915 7906 7667 7313 7074 6715 6293 58 9/15/2019 5781 6382 6960 7510 7961 8303 8570 8698 8701 8441 8078 7794 7299 6698 66 9/16/2019 6707 7304 7885 8430 8876 9142 9303 931 9142 8844 8569 8229 7706 7007 63 9/17/2019 6427 6962 7515 8030 8472 8737 8882 8950 8829 8451 8048 7744 7250 6559 59 9/18/2019 6498 7073 7665 8219 8643 8903 9059 9163 9032 8714 8274 7892 7330 6676 607																5815
9/11/2019 6878 7373 7822 8280 8724 9071 9243 9294 9196 8837 8377 8061 7594 6943 63 9/14/2019 5059 5515 5987 6488 6956 7374 7688 7915 7906 7667 7313 7074 6715 6293 58 9/15/2019 5781 6382 6960 7510 7961 8303 8570 8698 8701 8441 8078 7794 7299 6698 608 9/16/2019 6707 7304 7885 8430 8876 9142 9303 9331 9142 8884 8569 8229 7706 7007 63 9/17/2019 6427 6962 7515 8030 8472 8737 8882 9850 8829 8451 8048 7744 7250 6559 59 9/18/2019 6498 7073 7665 8219 8643 8903	9/9/2019	6650	7209	7726	8172	8569	8797	8927		8815	8531	8163	7920	7454	6860	6303
9/14/2019 5059 5515 5987 6468 6956 7374 7688 7915 7906 7667 7313 7074 6715 6293 58 9/15/2019 5781 6382 6960 7510 7961 8303 8570 8698 8701 8441 8078 7794 7299 6698 60 9/16/2019 6707 7304 7885 8430 8876 9142 9303 9331 9142 8884 8699 8229 7706 7007 639 9/17/2019 6427 6962 7515 8030 8472 8737 8882 8950 8229 8451 8048 7744 7250 6559 59 9/18/2019 6498 7073 7665 8219 8643 8903 9059 9163 9032 8714 8274 7892 7330 6676 60																6167
9/15/2019 5781 6382 6960 7510 7961 8303 8570 8698 8701 8441 8078 7794 7299 6698 60 9/16/2019 6707 7304 7885 8430 8876 9142 9303 9331 9142 8884 8569 8229 7706 7007 63 9/17/2019 6427 6962 7515 8030 8472 8737 8882 8950 8829 8451 8048 7744 7250 6559 59 9/18/2019 6498 7073 7665 8219 8643 8903 9059 9163 9032 8714 8274 7892 7330 6676 60																6360 5852
9/16/2019 6707 7304 7885 8430 8876 9142 9303 9331 9142 8884 8569 8229 7706 7007 63 9/17/2019 6427 6962 7515 8030 8472 8737 8882 8950 8829 8451 8048 7744 7250 6559 59 9/18/2019 6498 7073 7665 8219 8643 8903 9059 9163 9032 8714 8274 7892 7330 6676 60																6093
9/17/2019 6427 6962 7515 8030 8472 8737 8882 8950 8829 8451 8048 7744 7250 6559 59 9/18/2019 6498 7073 7665 8219 8643 8903 9059 9163 9032 8714 8274 7892 7330 6676 60			7304													6334
																5942
																6031
	9/19/2019	6598 5935	7280 6334	7955 6666	8438 7009	8811 7328	9064 7524	9116 7725	9012 7817	8827 7636	8478 7281	8195 7019	7864 6735	7347 6260	6694 5635	6062 5069
																5582
																6057
10/1/2019 6633 7182 7632 8073 8456 8615 8693 8623 8327 7925 7766 7542 7085 6427 58	10/1/2019	6633	7182	7632	8073	8456	8615	8693	8623	8327	7925	7766	7542	7085	6427	5866

Figure 7: 2019 Missouri Metro High Load Days

DATE	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
1/30/2019	1308	1354	1382	1384	1348	1387	1389	1391	1364	1366	1358	1402	1436	1394	1358	1303	1259	1198
1/31/2019	1328	1361	1364	1323	1293	1239	1185	1142	1107	1083	1103	1154	1206	1195	1172	1127	1079	1039
5/16/2019	856	913	990	1032	1108	1163	1193	1240	1294	1319	1325	1323	1290	1261	1209	1182	1071	981
6/5/2019 6/7/2019	950 876	1028 951	1128 1037	1228 1109	1305 1181	1382 1257	1447 1304	1498 1362	1563 1386	1585 1391	1559 1390	1523 1380	1515 1341	1464 1278	1406 1220	1347 1194	1215 1127	1084 1049
6/17/2019	954	1009	1064	1159	1200	1275	1315	1365	1387	1402	1354	1330	1268	1243	1194	1176	1096	999
6/18/2019	909	973	1004	1063	1147	1232	1293	1343	1355	1380	1350	1275	1205	1148	1097	1092	1012	938
6/20/2019	853	941	1014	1070	1102	1107	1162	1248	1286	1311	1342	1406	1394	1369	1312	1284	1207	1116
6/22/2019	814	836	902	964	1068	1161	1225	1281	1339	1365	1379	1386	1326	1249	1208	1128	1012	945
6/25/2019 6/26/2019	866 910	920 996	973 1052	1039 1135	1119 1188	1189 1231	1246 1270	1314 1334	1370 1357	1418 1376	1439 1388	1446 1392	1415 1361	1366 1309	1298 1257	1251 1224	1161 1143	1080 1063
6/27/2019	974	1059	1132	1231	1327	1398	1460	1512	1547	1565	1560	1517	1482	1426	1357	1307	1239	1148
6/28/2019	1019	1101	1208	1276	1392	1484	1550	1601	1637	1649	1647	1621	1560	1493	1430	1406	1311	1224
6/29/2019	973	1037	1095	1186	1295	1392	1526	1572	1561	1594	1600	1616	1609	1513	1415	1386	1307	1241
6/30/2019 7/1/2019	948 1013	995 1099	1088 1186	1174 1274	1270 1335	1331 1411	1384 1476	1428 1524	1479 1566	1503 1569	1519 1594	1519 1572	1499 1547	1458 1484	1378 1420	1336 1383	1257 1306	1156 1205
7/2/2019	1037	1129	1205	1300	1372	1451	1505	1555	1575	1587	1595	1560	1556	1508	1449	1412	1329	1239
7/3/2019	1049	1113	1177	1208	1271	1325	1392	1445	1499	1510	1495	1487	1415	1339	1256	1213	1140	1067
7/6/2019	817	845	916	1024	1119	1186	1219	1255	1296	1325	1351	1354	1332	1283	1229	1210	1135	1071
7/7/2019 7/8/2019	869 978	904 1060	969 1130	1070 1220	1142 1306	1213 1365	1270 1411	1315 1470	1352 1505	1380 1532	1406 1528	1416 1511	1405 1452	1350 1413	1303 1357	1267 1336	1183 1244	1099 1160
7/9/2019	1059	1119	1172	1263	1364	1448	1530	1597	1677	1722	1739	1736	1695	1679	1612	1571	1500	1361
7/10/2019	1157	1227	1322	1217	1134	1163	1176	1251	1314	1347	1359	1351	1378	1354	1278	1228	1153	1060
7/11/2019	939	1016	1072	1130	1190	1253	1290	1331	1415	1436	1446	1439	1420	1373	1308	1288	1157	1073
7/12/2019	919	987	1077	1152	1226	1297	1391	1496	1524	1495	1530	1532	1520	1468	1320	1265	1177	1096
7/13/2019 7/14/2019	874 883	926 920	1016 1014	1107 1128	1181 1245	1248 1332	1316 1377	1369 1438	1436 1487	1459 1512	1483 1532	1482 1525	1466 1510	1399 1457	1341 1405	1305 1346	1243 1274	1151 1174
7/15/2019	992	1075	1138	1199	1261	1332	1378	1406	1416	1415	1438	1399	1369	1330	1273	1229	1149	1060
7/16/2019	951	1029	1097	1153	1243	1300	1366	1449	1504	1544	1558	1586	1556	1521	1450	1409	1313	1211
7/17/2019	1045	1133	1223	1318	1414	1482	1534	1558	1608	1678	1693	1704	1680	1634	1569	1532	1435	1340
7/18/2019 7/19/2019	1146	1213 1225	1289 1312	1360 1390	1454	1548	1613	1671	1671	1665	1652	1665	1677	1645	1590	1557	1474	1364
7/19/2019	1168 1065	1115	1219	1390	1476 1402	1548 1454	1618 1515	1677 1555	1728 1605	1766 1635	1753 1669	1739 1676	1742 1657	1682 1602	1612 1553	1586 1527	1500 1461	1409 1369
7/22/2019	934	983	1062	1112	1178	1238	1277	1308	1314	1341	1341	1327	1273	1215	1138	1103	1052	963
7/24/2019	856	913	982	1056	1110	1168	1208	1255	1276	1306	1316	1335	1294	1250	1180	1112	1025	932
7/26/2019	859	913	1009	1059	1128	1204	1271	1327	1374	1396	1399	1405	1345	1276	1226	1165	1092	1029
7/27/2019 7/28/2019	794 798	820 829	912 896	995 969	1073 1072	1128 1158	1187 1240	1234 1298	1273 1350	1295 1375	1332 1400	1318 1406	1286 1392	1243 1345	1182 1323	1160 1286	1094 1216	1027 1107
7/29/2019	992	1059	1142	1213	1281	1338	1424	1537	1549	1586	1571	1502	1455	1389	1292	1231	1149	1053
7/30/2019	936	991	1046	1126	1191	1247	1312	1362	1394	1428	1445	1449	1425	1363	1293	1258	1161	1070
8/1/2019	928	970	1014	1056	1137	1195	1262	1333	1382	1393	1382	1353	1318	1285	1244	1223	1147	1077
8/4/2019 8/5/2019	802	831 1034	891 1094	976 1183	1083 1296	1170 1400	1225 1461	1295 1502	1333 1528	1372 1568	1381 1575	1390 1571	1356 1480	1307 1401	1284 1360	1233 1312	1151 1220	1058 1136
8/6/2019	963 1066	1116	1204	1282	1397	1526	1603	1653	1700	1721	1717	1694	1662	1589	1458	1351	1237	1138
8/7/2019	1023	1063	1091	1078	1103	1127	1201	1287	1360	1433	1474	1480	1418	1331	1260	1221	1138	1061
8/8/2019	966	1009	1028	1054	1102	1148	1187	1275	1339	1389	1414	1444	1404	1369	1315	1273	1183	1096
8/9/2019	983 921	1044 944	1109 1006	1170 1090	1260 1195	1330	1421 1324	1475 1362	1515 1416	1543 1451	1542 1471	1517 1467	1472 1456	1402 1402	1355 1370	1295	1216 1240	1143 1159
8/10/2019 8/11/2019	993	1008	1033	1031	1040	1279 1067	1105	1160	1247	1300	1318	1351	1351	1332	1314	1320 1276	1201	1139
8/12/2019	1051	1089	1154	1247	1327	1438	1584	1685	1731	1747	1736	1718	1683	1616	1581	1495	1403	1310
8/13/2019	1114	1162	1244	1311	1400	1461	1521	1584	1604	1621	1598	1573	1516	1441	1390	1304	1196	1103
8/14/2019	1018	1054	1104	1163	1228	1289	1360	1398	1437	1460	1462	1455	1424	1338	1270	1208	1113	1007
8/15/2019 8/17/2019	913 825	965 818	1021 851	1075 914	1135 993	1202 1067	1252 1134	1301 1213	1346 1259	1380 1319	1338 1375	1328 1382	1303 1374	1260 1325	1257 1272	1180 1220	1029 1142	939 1088
8/18/2019	829	838	873	913	969	1049	1157	1249	1319	1366	1421	1444	1413	1376	1330	1281	1189	1093
8/19/2019	1011	1060	1105	1185	1313	1454	1538	1618	1681	1735	1756	1754	1715	1600	1547	1490	1383	1292
8/20/2019	1195	1226	1276	1331	1400	1445	1499	1540	1612	1648	1667	1680	1661	1577	1511	1465	1344	1231
8/23/2019	977	1007	1051	1103	1157	1207	1270	1297	1326	1346	1354	1329	1267	1198	1170	1122	1065	1019
8/28/2019 8/29/2019	902 923	937 967	980 1042	1057 1124	1135 1220	1189 1301	1237 1383	1287 1467	1343 1501	1382 1540	1413 1550	1413 1549	1395 1497	1306 1434	1278 1385	1199 1226	1065 1089	948 984
9/2/2019	742	741	802	870	961	1030	1115	1171	1239	1297	1338	1346	1313	1262	1232	1160	1081	991
9/3/2019	990	1030	1074	1119	1183	1279	1431	1518	1563	1619	1639	1628	1519	1471	1455	1373	1282	1180
9/4/2019	1011	1019	1041	1085	1117	1163	1211	1296	1321	1343	1344	1351	1288	1247	1164	1101	1011	924
9/5/2019 9/6/2019	900 1017	941 1054	986 1091	1035 1140	1128 1207	1245 1336	1375 1392	1486 1430	1541 1409	1528 1450	1541 1431	1586 1412	1541 1385	1500 1300	1455 1210	1339 1121	1199	1106 948
9/6/2019	981	1034	1091	1153	1253	1330	1410	1480	1409	1522	1534	1518	1435	1383	1360	1278	1189	1128
9/10/2019	1011	1030	1084	1120	1183	1232	1291	1336	1406	1437	1430	1397	1368	1336	1306	1208	1135	1043
9/11/2019	995	1034	1095	1153	1241	1314	1387	1468	1534	1553	1560	1545	1458	1402	1357	1283	1171	1089
9/12/2019	1046	1079	1113	1209	1305	1323	1346	1447	1462	1416	1353	1284	1234	1252	1208	1163	1083	996
9/15/2019 9/16/2019	854 1045	867 1095	935 1156	1010 1226	1090 1315	1185 1396	1263 1495	1336 1547	1391 1590	1440 1587	1448 1570	1439 1535	1398 1511	1363 1483	1329 1440	1257 1356	1175 1248	1083 1148
9/17/2019	1039	1077	1123	1175	1251	1360	1504	1578	1619	1637	1636	1572	1482	1418	1373	1286	1167	1091
9/18/2019	1008	1047	1090	1172	1257	1368	1446	1518	1575	1636	1642	1602	1548	1457	1384	1285	1204	1114
9/19/2019	1035	1077	1130	1195	1280	1386	1451	1512	1549	1567	1531	1523	1442	1419	1366	1277	1172	1075
9/20/2019 9/25/2019	992	1028	1059	1106	1138	1208	1297	1342	1380	1387	1296	1241	1184	1170	1138	1077	1040	989
9/25/2019	1015 861	1053 913	1053 961	1080 1044	1124 1141	1150 1231	1204 1301	1248 1376	1296 1445	1319 1470	1326 1474	1280 1436	1208 1374	1171 1329	1118 1263	1054 1176	951 1032	940
9/30/2019	999	1036	1090	1135	1214	1288	1397	1445	1525	1542	1525	1493	1362	1329	1299	1236	1147	1072
10/1/2019	1006	1046	1084	1152	1245	1349	1480	1534	1558	1594	1591	1542	1488	1458	1395	1324	1214	1080
10/2/2019	1075	1094	1084	1104	1150	1221	1285	1340	1373	1400	1403	1373	1307	1235	1131	1032	924	824

Figure 8: 2019 Missouri West High Load Days

DATE	4	-		7	0	9	10	11	12	12	14	15	1/	17	10	19	20	21	22	22
1/25/2019	4 1279	5 1313	6 1376	1466	8 1477	1443	10 1373	11 1314	12 1272	13 1244	1211	1202	16 1176	1176	18 1214	1227	1205	21 1188	1165	23 1106
1/28/2019	865	892	965	1091	1180	1194	1180	1185	1179	1181	1182	1183	1196	1256	1340	1404	1390	1376	1344	1268
1/29/2019	1205	1230	1286	1377	1404	1360	1338	1292	1262	1251	1244	1269		1348	1403	1437	1428	1412	1389	1352
1/30/2019	1401	1439	1500	1554	1601	1600	1601	1586	1558	1545	1530	1521	1507	1539	1591	1600	1587	1546	1497	1425
1/31/2019 2/7/2019	1375 1072	1388 1108	1452 1161	1531 1236	1567 1300	1539 1361	1496 1393	1419 1420	1346 1401	1275 1391	1227 1383	1173 1376	1153 1367	1164 1380	1242 1434	1274 1483	1271 1480	1245 1453	1198 1432	1141 1366
2/8/2019	1308	1334	1386	1451	1480	1459	1415	1379	1336	1292	1254	1221	1191	1203	1256	1325	1334	1330	1313	1274
3/3/2019	1106	1144	1189	1241	1274	1325	1328	1305	1279	1272	1256	1231	1229	1266	1327	1442	1481	1487	1465	1412
3/4/2019	1369	1406	1455	1532	1534	1504	1462	1423	1377	1338	1309	1283	1277	1300	1341	1440	1474	1476	1434	1383
3/5/2019	1350	1362	1434	1520	1499	1442	1375	1331	1289	1261	1228	1205	1191	1206	1250	1333	1357	1352	1327	1285
3/6/2019	1254	1290	1353	1433	1429	1338	1262	1214	1156	1131	1099	1084		1113	1154	1203	1205	1177	1152	1063
5/16/2019 6/4/2019	718 754	722 762	769 806	836 862	905 915	949 953	1014 1006	1082 1088	1136 1172	1199 1243	1244 1284	1290 1293	1335 1352	1368 1401	1393 1435	1365 1418	1317 1369	1280 1311	1221 1261	1098 1134
6/5/2019	814	813	847	903	1011	1093	1186	1276	1366	1442	1517	1568	1593	1600	1614	1596	1529	1456	1379	1208
6/6/2019	796	797	820	878	906	953	988	1050	1107	1175	1240	1298		1400	1407	1386	1321	1261	1216	1098
6/7/2019	782	772	794	857	920	1007	1084	1191	1278	1345	1393	1435	1461	1478	1472	1429	1368	1295	1249	1155
6/20/2019	681	688	720	763	830	901	972	1037	1075	1158	1240	1309		1444	1462	1470	1426	1366	1318	1195
6/22/2019 6/25/2019	736	729 702	741	755	794	844	926	1037	1162	1253	1326	1382	1431	1446 1555	1437	1376	1300	1249	1192	1074
6/26/2019	711 821	810	748 835	790 870	855 930	921 1012	1007 1092	1105 1187	1209 1232	1294 1277	1378 1327	1442 1391	1508 1425	1478	1563 1504	1543 1460	1484 1392	1388 1322	1316 1269	1187 1178
6/27/2019	839	835	855	916	1012	1114	1215	1333	1430	1506	1575	1617	1637	1660	1640	1600	1534	1467	1423	1306
6/28/2019	924	907	928	974	1068	1172	1288	1393	1498	1603	1671	1712	1740	1724	1711	1639	1574	1503	1458	1345
6/29/2019	948	918	914	909	977	1095	1225	1340	1449	1521	1581	1615	1648	1662	1664	1642	1585	1497	1434	1340
6/30/2019	927	890	863	855	934	1049	1170	1281	1376	1460	1511	1557	1592	1629	1646	1614	1558	1481	1408	1297
7/1/2019	894	877	896	927	1032	1148	1252	1367	1460	1534	1594	1639	1683	1695	1714	1688	1622	1535	1473	1341
7/2/2019 7/3/2019	923 933	910 926	922 937	965 963	1049 1036	1156 1099	1269 1184	1370 1268	1462 1354	1534 1423	1596 1509	1629 1559	1671 1580	1676 1587	1696 1559	1658 1488	1610 1408	1527 1321	1462 1260	1340 1158
7/6/2019	726	712	716	724	766	859	966	1083	1166	1248	1305	1359	1418	1450	1461	1437	1383	1292	1239	1150
7/7/2019	827	802	789	785	826	910	1015	1127	1221	1318	1384	1421	1462	1504	1519	1501	1452	1363	1293	1197
7/8/2019	839	844	886	922	1002	1087	1196	1321	1400	1457	1519	1589	1614	1640	1638	1583	1519	1450	1403	1277
7/9/2019	906	918	950	1011	1078	1147	1243	1359	1461	1552	1625	1699	1748	1780	1778	1758	1692	1625	1562	1438
7/10/2019	1010	1002	1022	1061	1152	1239	1274	1182	1184	1253	1304	1377	1451	1497	1529	1507	1455	1358	1282	1166
7/11/2019 7/12/2019	798	787	814	853 855	927	1009	1083	1174	1237	1306	1377	1429	1473	1492	1505	1484	1425	1342	1272	1154
7/12/2019	795 794	794 765	808 772	855 780	929 836	1018 948	1128 1070	1212 1190	1308 1289	1374 1370	1447 1419	1489 1473	1537 1520	1551 1544	1567 1559	1541 1535	1473 1484	1382 1395	1298 1331	1186 1211
7/14/2019	836	808	797	792	856	979	1114	1237	1348	1428	1478	1519	1566	1589	1608	1579	1528	1449	1388	1279
7/15/2019	861	857	881	919	989	1065	1127	1214	1289	1349	1390	1415	1435	1448	1443	1419	1360	1296	1253	1140
7/16/2019	803	809	847	889	960	1025	1099	1176	1262	1352	1445	1518	1579	1642	1665	1660	1601	1520	1450	1324
7/17/2019	936	936	963	1002	1089	1188	1332	1443	1533	1581	1619	1642	1705	1761	1776	1767	1721	1630	1573	1445
7/18/2019	1071	1059	1081	1106	1183	1264	1380	1486	1580	1650	1720	1744	1791	1775	1805	1818	1757	1678	1608	1505
7/19/2019 7/20/2019	1108 1069	1087 1023	1100 1016	1126 994	1196	1296 1164	1396 1290	1497	1583 1491	1660	1729 1617	1785	1837	1831 1745	1827	1817	1747 1690	1669	1603 1552	1496 1452
7/24/2019	710	709	739	790	1063 837	903	975	1404 1056	1117	1566 1190	1244	1687 1298	1720 1338	1385	1762 1392	1736 1377	1320	1614 1241	1176	1046
7/26/2019	782	786	809	838	903	981	1058	1162	1239	1312	1364	1420	1456	1484	1467	1421	1340	1261	1211	1107
7/27/2019	751	732	734	731	783	878	979	1080	1180	1252	1321	1366		1434	1434	1398	1329	1254	1199	1105
7/28/2019	773	750	752	743	798	889	989	1086	1196	1297	1383	1428	1476	1512	1521	1476	1423	1354	1290	1197
7/29/2019	887	879	919	947	1004	1088	1174	1264	1343	1406	1480	1531	1555	1579	1570	1550	1492	1375	1296	1150
7/30/2019	781	781	809	854	914	982	1065	1155	1250	1330	1392	1448	1491	1524	1535	1504	1442	1344	1277	1140
8/1/2019 8/3/2019	755	758	800 745	854	901	968	1015	1104 1061	1191 1153	1260	1334 1275	1395 1329	1438 1357	1453 1383	1442 1401	1410	1358	1303 1220	1241	1147 1060
8/4/2019	753 738	728 721	722	747 720	778 760	856 862	952 973	1099	1198	1230 1295	1353	1409	1448	1480	1491	1368 1478	1311 1427	1342	1146 1274	1164
8/5/2019	810	814	843	882	949	1024	1133	1261	1371	1434	1487	1528	1556	1598	1575	1540	1482	1422	1353	1226
8/6/2019	897	880	930	967	1034	1133	1234	1352	1458	1546	1611	1653	1679	1678	1689	1672	1586	1492	1399	1252
8/7/2019	860	857	900	948	985	1017	1026	1047	1080	1148	1202	1272		1427	1475	1456	1398	1339	1256	1123
8/8/2019	790	789	825	878	923	966	997	1049	1106	1167	1264	1353	1433	1494	1525	1518	1449	1379	1301	1182
8/9/2019 8/10/2019	828 867	818 829	848 832	895 831	945 872	1031 966	1105 1069	1208 1209	1300 1311	1398 1381	1472 1437	1532 1503	1561 1555	1579 1585	1567 1581	1543 1563	1469 1505	1397 1434	1339 1369	1233 1255
8/11/2019	905	888	889	913	947	980	1015	1043	1076	1106	1175	1262	1349	1402	1457	1450	1403	1369	1313	1212
8/12/2019	914	929	962	1011	1057	1103	1205	1325	1439	1560	1648	1735	1791	1784	1802	1780	1699	1641	1560	1440
8/13/2019	1011	995	1008	1054	1103	1181	1287	1395	1500	1564	1630	1670	1693	1708	1696	1653	1566	1463	1368	1230
8/14/2019	834	828	863	921	961	1029	1106	1189	1270	1339	1402	1456	1497	1524	1529	1494	1418	1342	1236	1098
8/17/2019	796	772	762	783	791	826	888	950	1021	1106	1213	1293	1368	1396	1457	1448	1388	1320	1253	1154
8/18/2019 8/19/2019	872 840	845 830	835 879	830 955	839 1014	900 1084	961 1181	1006 1313	1085	1188	1294	1385	1463	1520 1839	1552 1855	1549	1479	1413	1315 1601	1199
8/20/2019	1066	1054	1083	1160	1178	1238	1321	1409	1439 1455	1558 1459	1663 1524	1741 1585	1808 1660	1709	1743	1818 1726	1748 1660	1700 1610	1522	1463 1372
8/23/2019	803	801	835	905	944	983	1022	1096	1160	1220	1284	1337	1378	1403	1391	1340	1258	1203	1161	1069
8/28/2019	719	715	764	829	873	902	942	1002	1072	1128	1205	1269	1327	1383	1396	1359	1285	1221	1137	1010
8/29/2019	721	731	773	863	911	975	1050	1159	1273	1372	1462	1533	1579	1620	1627	1614	1540	1439	1269	1077
9/2/2019	650	641	650	650	667	738	833	937	1051	1166	1254	1326		1439	1491	1457	1394	1339	1239	1113
9/3/2019	817	835	870	944	1003	1055	1126	1217	1308	1420	1511	1586		1717	1715	1658	1595	1539	1433	1285
9/4/2019 9/5/2019	869 738	852 738	857 779	932 871	955 907	980 956	1013	1084 1115	1139 1226	1209 1337	1265 1445	1331 1549	1370 1620	1420 1664	1418 1662	1381 1616	1296 1531	1249 1496	1154 1387	1031 1257
9/6/2019	863	857	887	957	989	1043	1113	1115	1274	1350	1445	1471	1491	1509	1482	1398	1295	1230	1140	
9/7/2019	708	704	708	727	755	803	887	962	1057	1134	1211	1303		1401	1412	1358	1281	1220	1150	1055
9/9/2019	799	812	865	943	995	1059	1144	1255	1368	1487	1574	1643	1659	1674	1652	1617	1542	1478	1370	1276
9/10/2019	917	894	935	997	1040	1080	1128	1186	1257	1339	1412	1490		1546	1533	1495	1440	1398	1320	1204
9/11/2019	881	872	914	999	1040	1103	1200	1291	1379	1466	1545	1609	1652	1673	1661	1604	1518	1466	1375	1236
9/12/2019 9/14/2019	910 666	894 662	932 672	1034 704	1071 732	1142 793	1225	1329 930	1378 1018	1417 1103	1438 1210	1450 1303		1385 1425	1364 1417	1330 1386	1313 1302	1277 1258	1219 1176	1109 1101
9/14/2019	821	798	798	804	827	914	856 1028	1149	1238	1343	1432	1500		1577	1582	1538	1482	1418	1310	1101
9/15/2019	861	864	897	979	1014	1081	1179	1293	1400	1502	1594	1636		1713	1680	1624	1585	1515	1403	1254
9/17/2019	880	877	915	996	1034	1091	1131	1241	1375	1486	1582	1637	1662	1688	1674	1602	1532	1478	1370	1230
9/18/2019	860	852	891	979	1013	1067	1146	1272	1394	1513	1604	1656	1689	1720	1697	1630	1547	1485	1375	1247
9/19/2019	873	866	906	988	1016	1082	1150	1270	1391	1488	1554	1614		1613	1573	1528	1475	1413	1322	1183
9/20/2019	863	858	890	958	1008	1041	1101	1162	1248	1355	1435	1476		1412	1369	1295	1248	1212	1149	1064
9/25/2019	782	793	838	925	966	987	1024	1092	1160	1217	1291	1339		1410	1382	1307	1251	1197	1098	974
9/27/2019 9/30/2019	715 843	729 853	776 903	860 988	906 1034	957 1070	1030 1142	1142 1193	1249 1299	1345 1390	1433 1468	1506 1509		1572 1574	1550 1537	1464 1470	1414 1427	1352 1368	1262 1279	1122 1159
10/1/2019	866	860	888	988	1034	1070	1142	1254	1350	1440	1548	1601	1622	1617	1576	1508	1427	1410	1319	1197
10/2/2019	873	877	901	982	1018	1040	1088	1145	1232	1304	1365	1429		1461	1468	1413	1329	1241	1150	
			-01							. 50 1	. 200		00							

A review of Southwest Power Pool's ("SPP's") Integrated Marketplace day-ahead ("DA") locational marginal prices ("LMP") for 2019 do not indicate a significant seasonal pattern in average daily prices and show that 'price spikes' can occur throught the year. Figure 9 shows that SPP's maximum daily DA prices exhibit quite a bit of fluctuation on a daily basis but the daily average DA prices are fairly consistent throughout the year.

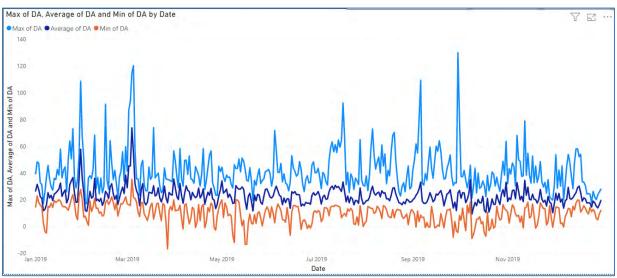


Figure 9: 2019 SPP Daily Peak Prices-KCP&L LMP(\$/MW)

Further analysis of the SPP DA energy prices shows that the SPP DA average daily energy price profile is substantially different between the summer and non-summer period, as shown in Figure 10. This further supports the summer season definition of June through September.

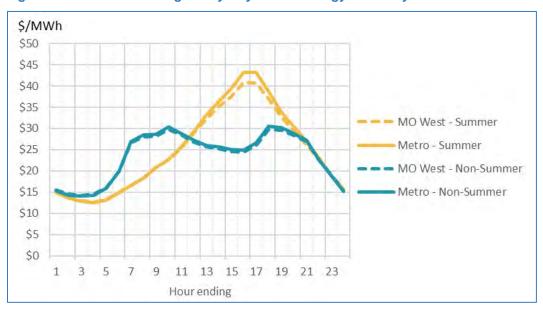


Figure 10: 2019 SPP Average Daily Day Ahead Energy Prices by Season

A review of cooling degree days for the past 10 years also indicate that the summer period should be aligned with the calendar period June 1 through September 30. Table 2 below shows that June, July, and August are clearly the three dominant summer season months. September historically has 60% higher cooling degree days than May, further supporting the June-September summer period.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
2010	0	0	6	38	109	383	488	512	158	11	0	0
2011	0	0	3	20	111	336	568	414	97	48	1	0
2012	0	0	49	40	180	385	634	376	131	39	5	0
2013	0	0	0	13	92	276	367	346	223	28	0	0
2014	0	0	0	9	152	277	289	395	130	14	0	0
2015	0	0	2	7	59	301	398	304	262	33	0	0
2016	0	0	2	12	57	417	428	381	221	55	13	0
2017	0	0	6	27	78	299	446	222	205	42	0	0
2018	0	0	0	11	269	390	439	391	217	40	0	0
2019	0	0	0	17	81	272	404	349	304	22	0	0
Total	0	0	68	194	1188	3336	4461	3690	1948	332	19	0

Table 2: Historical Monthly Cooling Degree Days

5.4.2 TOU Time Period Analysis

In defining the daily time periods for TOU pricing programs, consideration must be given to the actual seasonal and daily fluctuation in system and customer class loads along with the wholesale costs of energy. This section of the Report provides an overview of the analysis Evergy performed in developing the time periods for residential TOU tariffs. This analysis is presented in the following sections:

- System Load Analysis
- SPP Energy Market Pricing Analysis
- Residential Class Load Analysis
- System Cost Analysis

This analysis shows there is considerable empirical support for the following general daily TOU time periods:

- Summer On-Peak 6-hour period from 2 pm to 8 pm
- Super Off-Peak 6-hour period from Midnight to 6 am

There is less empirical support for a general daily Non-Summer On-Peak period, but the system and residential load profiles are elevated in the late afternoon and early evening hours, potentially indicating there may not be a need for a Non-Summer On-Peak period, or that the Non-Summer On-Off-Peak price differential should be modest in comparison to the Summer season differentials.

It should be noted that Evergy used the seasonal and general daily TOU pricing periods presented here in the Business Electric Vehicle Charging Service ("BEVCS") tariff proposed in the Company's current Transportation Electrification filing²³.

The identification of an optimum, most desirable 4-hour On-Peak period for residential customers is less straight forward. Most of the empirical evidence based on analysis of historical data indicates for a 4-hour Summer On-Peak period from 3–7 pm, which is slightly misaligned with the residential class 4-hour peak load period and Evergy's current TOU On-Peak period from 4-8 pm. Based on a desire to maintain consistency with the current TOU rate design and "future proof" the time period for the future anticipated impact of increased solar penetration and customer behavioral load shifts, Evergy determined to continue with the On-Peak period of 4-8 pm.

5.4.2.1 System Load Analysis

The first step in the TOU time period analysis was to establish and compare the system peak day/hour for each jurisdiction. Table 3 lists the system peak day and hour for the consolidated Evergy system and individual jurisdiction for each of the past five years. The Evergy summer system peak usage periods are very weather temperature dependent and the Peak Day varies throughout the months of July and August based on when the hottest days occur. However, the system annual Peak Hour consistently occurs from 4-5 pm as the late afternoon increases in residential usage adds to the system load and before the commercial and industrial loads begin to diminish.

Table 2.	F	7	L	lurisdictio	

	Ever	gy		KS M	etro		MO M	etro		MO W	/est		KS Ce	entral	
Year	Date	Hour	MW	Date	Hour	MW	Date	Hour	MW	Date	Hour	MW	Date	Hour	MW
2019	7/19	4-5	10.380	7/18	5-6*3	1,700	7/19	3-4	1766	8/19	5-6	1,855	7/19	4-5	5,108
	GPE			KCP&	L-KS		KCP&	L-MO		KCP8	L-GMC)	Westa	ır	
2018	7/12	4-5	5,439	6/28	4-5	1,737	7/11	3-4*2	1,819	7/12	5-6*3	1,929	6/28	4-5	5,204
2017	7/20	5-6*3	5,384	7/21	4-5	1,648	7/20	5-6*3	1,847	7/20	4-5	1,910	7/20	4-5	5,242
2019	8/04	4-5	5,408	8/11	5-6* ²	1,700	8/04	4-5	1,842	8/11	4-5	1,904	7/21	4-5	5,184
2015	7/13	4-5	5,266	7/13	4-5	1,623	7/13	4-5	1,802	7/13	4-5	1,841	7/24	4-5	5,167
2014	8/25	4-5	5,258	8/25	5-6* ³	1,605	7/22	4-5	1,833	8/25	5-6*2	1,849	8/25	4-5	5.223
2013	8/30	4-5	5,242	7/09	5-6* ³	1,556	7/22	4-5	1,878	8/30	4-5	1,860	7/09	4-5	5,184
2012	7/25	4-5	5,653	7/25	4-5	1,698	7/25	3-4*1	1,945	7/25	4-5	2,011	7/25	3-4	5,393

^{*1} Load was 1 MW greater than 4-5 hour

^{*2} Load was <5 MW greater than 4-5 hour

^{*3} Load was <10 MW greater than 4-5 hour

To identify general system peak loading periods for all Evergy jurisdictions, the combined Evergy load profile for 2019 was reviewed. Table 4 shows the 72 peak load hours (red shading) where total system load exceeded 90% of the 2019 annual system peak. All of the peak load hours occurred between noon and 9 pm, with nearly 90% (64) of the peak hours occurring during a 6-hour period from 2 pm to 8 pm.

Table 4: Evergy 2019 Peak Load Hours

DATE	12	13	14	15	16	17	18	19	20	21	22
6/28/2019	8441	8902	9294	9521	9738	9742	9623	9330	8963	8524	8283
6/29/2019	8132	8573	8914	9122	9281	9348	9336	9146	8837	8394	8113
7/2/2019	8207	8584	8978	9155	9339	9383	9353	9150	8710	8242	7910
7/9/2019	8107	8652	9074	9428	9675	9804	9817	9660	9383	8977	8635
7/17/2019	8654	9087	9419	9708	9962	10099	10116	10027	9710	9285	8934
7/18/2019	8964	9401	9795	9987	10186	10188	10189	10122	9809	9384	9077
7/19/2019	9019	9459	9885	10171	10339	10380	10301	10158	9792	9337	9035
7/20/2019	8461	8874	9220	9551	9760	9920	9953	9796	9477	9054	8761
8/6/2019	8378	8863	9273	9526	9579	9492	9346	9152	8757	8276	7845
8/12/2019	8350	8930	9458	9830	10018	9994	9954	9720	9301	8977	8582
8/13/2019	8388	8785	9140	9379	9476	9452	9326	9056	8586	8109	7637
8/19/2019	8250	8853	9383	9771	10031	10174	10186	9992	9608	9307	8836
8/20/2019	8423	8713	9125	9507	9736	9918	9938	9761	9403	9099	8675
9/3/2019	7589	8145	8638	9063	9364	9533	9474	9199	8796	8515	7963

Table 5 shows that while each of the jurisdiction load profiles varies somewhat, they all generally align with the Evergy load pattern with 100% of peak load hours occurring between noon and 9 pm with over 80% of the peak load hours occurring between 2 pm and 8 pm.

Table 5: 2019 Peak Load Hours by Jurisdiction

MO-West I	IOURLY L	OAD									
DATE	12	13	14	15	16	17	18	19	20	21	22
6/28/2019	1498	1603	167	1712	1740	1724	1711	1639	1574	1503	1458
7/1/2019	1460	1534	159	1639	1683	1695	1714	1688	1622	1535	1473
7/2/2019	1462	1534	159	1629	1671	1676	1696	1658	1610	1527	1462
7/9/2019	1461	1552	162	1699	1748	1780	1778	1758	1692	1625	1562
7/17/2019	1533	1581	161	1642	1705	1761	1776	1767	1721	1630	1573
7/18/2019	1580	1650	172	1744	1791	1775	1805	1818	1757	1678	1608
7/19/2019	1583	1660	172	1785	1837	1831	1827	1817	1747	1669	1603
7/20/2019	1491	1566	161	1687	1720	1745	1762	1736	1690	1614	1552
8/6/2019	1458	1546	161	1653	1679	1678	1689	1672	1586	1492	1399
8/12/2019	1439	1560	164	1735	1791	1784	1802	1780	1699	1641	1560
8/13/2019	1500	1564	163	1670	1693	1708	1696	1653	1566	1463	1368
8/19/2019	1439	1558	166	1741	1808	1839	1855	1818	1748	1700	1601
8/20/2019	1455	1459	152	1585	1660	1709	1743	1726	1660	1610	1522
9/3/2019	1308	1420	151	1586	1665	1717	1715	1658	1595	1539	1433
9/9/2019	1368	1487	157	1643	1659	1674	1652	1617	1542	1478	1370
9/11/2019	1379	1466	154	1609	1652	1673	1661	1604	1518	1466	1375
9/16/2019	1400	1502	159	1636	1698	1713	1680	1624	1585	1515	1403
9/17/2019	1375	1486	1583	1637	1662	1688	1674	1602	1532	1478	1370
9/18/2019	1394	1513	160	1656	1689	1720	1607	1630	1547	1485	1375

MO-Metro HOU	JRLY LO	OAD									1	
DATE	12	13	14		15	16	17	18	19	20	21	22
6/28/2019	1484	1550	16	1	1637	1649	1647	1621	1560	149	1430	1406
6/29/2019	1392	1526	15	2	1561	1594	1600	1616	1609	151	1415	1386
7/1/2019	1411	1476	15	1	1566	1569	1594	1572	1547	148	1420	1383
7/2/2019	1451	1505	15	ō	1575	1587	1595	1560	1556	150	1449	1412
7/9/2019	1448	1530	15	7	1677	1722	1739	1736	1695	167	1612	1571
7/17/2019	1482	1534	15	3	1608	1678	1693	1704	1680	163	1569	1532
7/18/2019	1548	1613	16	-1	1671	1665	1652	1665	1677	164	1590	1557
7/19/2019	1548	1618	16	7	1728	1766	1753	1739	1742	168	1612	1586
7/20/2019	1454	1515	15	ō	1605	1635	1669	1676	1657	160	1553	1527
8/6/2019	1526	1603	16	3	1700	1721	1717	1694	1662	158	1458	1351
8/12/2019	1438	1584	16	5	1731	1747	1736	1718	1683	161	1581	1495
8/13/2019	1461	1521	15	1	1604	1621	1598	1573	1516	144	1390	1304
8/19/2019	1454	1538	16	3	1681	1735	1756	1754	1715	160	1547	1490
8/20/2019	1445	1499	15	2	1612	1648	1667	1680	1661	157	1511	1465
9/3/2019	1279	1431	15	3	1563	1619	1639	1628	1519	147	1455	1373
9/16/2019	1396	1495	15	7	1590	1587	1570	1535	1511	148	1440	1356
9/17/2019	1360	1504	15	3	1619	1637	1636	1572	1482	141	1373	1286
9/18/2019	1368	1446	15	3	1575	1636	1642	1602	1548	145	1384	1285
10/1/2019	1349	1480	15	1	1558	1594	1591	1542	1488	145	1395	1324

Since the peak load periods correlate so well, the Company established the 2 pm to 8 pm as a common 6-hour summer system peak load period that load modification rates and programs should be designed to address. The establishment of this common 6-hour system peak load period is not intended to set the peak period for any specific rates or programs as lower-level customer or device load profiles have been reviewed. It is only established as a time period that load modification measures should focus on for system capacity benefits. Individual measures

may need to incorporate only a subset of these hours or include hours outside of these to capture other grid level benefits, to encourage customer participation, or to minimize customer impact.

The monthly system peak loads were also analyzed to determine if the 6-hour system peak load period (2-8 pm) represents the time period in which monthly peaks can also be expected to occur. Table 6 presents the hour in which the system monthly peak has occurred during the past three years. A majority of the monthly system peak loads occur between 3 pm and 7 pm, but a few non-summer months experience a monthly system peak during the 7-8 am hour.

	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
Evergy 2019	1900	1900	800	1700	1800	1700	1700	1800	1700	1600	800	1900
GPE-2019	1900	1900	800	800	1800	1600	1700	1800	1700	1600	800	1800
GPE-2018	800	800	1900	800	1700	1800	1700	1600	1700	1700	800	800
GPE-2017	800	800	800	1700	1800	1700	1800	1700	1700	1700	800	1900

Table 6: Evergy/GPE²⁴ Monthly System Peak Load Hour (hour-ending)

Figure 11 shows that in 2019, the Evergy non-summer month average day, the four peak load hours, while much less pronounced in the non-summer months, occur between 5 pm and 9 pm with the next two highest load hours occur between 9 am and 11 am. Figure 15 shows similar patterns for each Missouri jurisdiction during non-summer months. A residential On-Peak TOU period for the non-summer months should consider both the monthly system peak period and the early evening residential load influence on the average load.

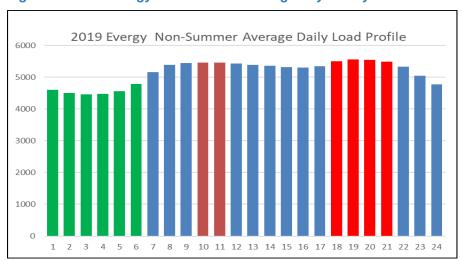


Figure 11: 2019 Evergy Non-Summer Average Day Hourly Loads

²⁴ In this table GPE (Great Plains Energy) represents the combined loads of the legacy KCP&L and KCP&L GMO jurisdictions and Evergy represents the combined loads of all current Evergy jurisdictions.

In defining the system minimum loading period for a 'Late-Night' or 'Super Off-Peak' TOU pricing programs across all Evergy jurisdictions, the Company first examined the combined Evergy load profile for 2019. Figure 12 illustrates that the 6-hour 'low-load' period with the lowest average system load occurs between midnight and 6 am.

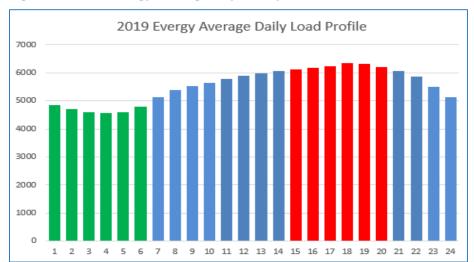


Figure 12: 2019 Evergy Average Day Hourly Loads

To determine if this 6-hour low-load period is consistent for all jurisdictions, the Company performed a similar examination for each jurisdiction. Figure 13 show the similar low-load period for each jurisdiction. The 6-hour period with the lowest load is consistently midnight to 6 am in each jurisdiction.

While each jurisdiction generally follows the Evergy load patterns, there are subtle differences in the jurisdictional system loading patterns due the customer classes that make up each jurisdictional customer base. Figure 14 and Figure 15 present the six highest and lowest average annual hourly load hours by jurisdiction and season (summer and non-summer).

Based on the system load analysis the following system level characteristics were identified and are used in defining the daily time periods for Residential TOU rates:

- Summer On-Peak period must incorporate the historical annual system peak hours (4 pm-6 pm).
- Summer On-Peak period should fall within the 6-hour (2 pm-8 pm) system peak loading period.
- Non-Summer peak load periods are less well defined but there is generally a 4-hour higher load period from 5 pm-9 pm.
- There is a 6-hour system low-load period from midnight to 6 am.

Figure 13: 2019 Evergy Average Day Hourly Loads by Jurisdiction

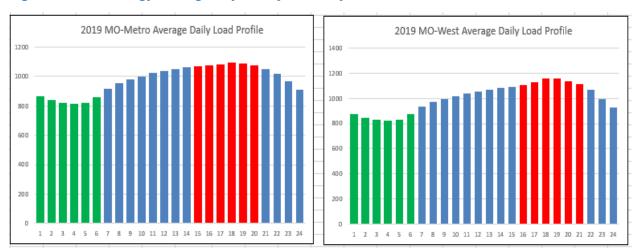
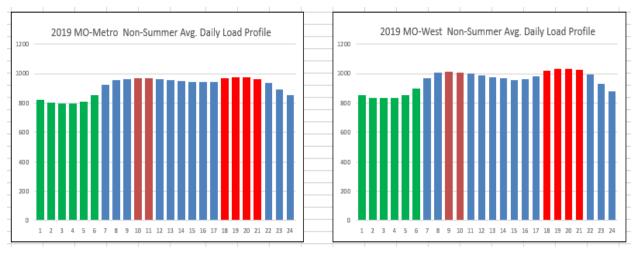


Figure 14: 2019 Evergy Average Summer Day Hourly Loads by Jurisdiction



Figure 15: 2019 Evergy Average Non-Summer Day Hourly Loads by Jurisdiction



5.4.2.2 SPP Energy Market Pricing Analysis

In defining the system peak loading periods for time varying rate ("TVR") pricing programs, consideration must also be given to the actual daily fluctuation in the cost of energy during each season season. Each TVR requires different considerations and analysis of hourly energy prices. For Critical Peak Pricing and Peak Time Rebate rate options the focus would be on determining the price impact of the few extreme or outlier pricing periods. In contrast, for TOU rates, which sets a fixed rate by time period and season, the focus of the analysis is to identify the consistent daily high- and or low-cost periods. For this TOU peak pricing period analysis, Evergy analyzed the 2017-2019 SPP day-ahead hourly prices.

The Evergy Metro and West systems each have individual SPP LMP load nodes that follow the same hourly price patterns, but often differ in magnitude due to transmission congestion that can occur between the load nodes. For report simplicity, we have only presented illustrations of the SPP DA LMPs for Evergy Metro.

As discussed earlier in this Report, a review of SPP's DA LMP for 2019 do not indicate a significant seasonal pattern in the average daily energy prices and show that 'price spikes' can occur throught the year. The previous seasonal analysis identified significant differences in the daily price profiles between the summer and non-summer seasons as illustrated in Figure 16.

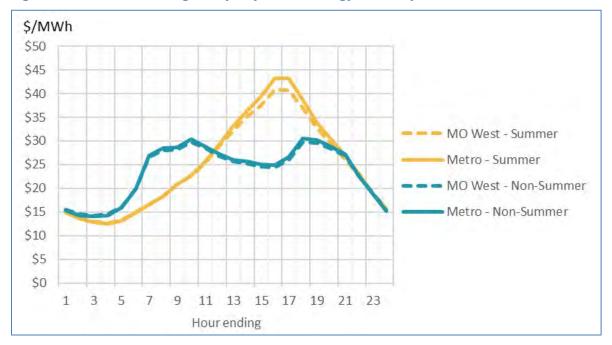


Figure 16 - 2019 SPP Average Daily Day Ahead Energy Prices by Season

In defining TOU pricing periods, consideration must be given to the actual daily fluctuation in the cost of energy. To identify any daily pricing patterns we further analyzed the three year monthly average hourly day-ahead energy prices which are illustrated in Figure 17. Inspection of the average hourly day-ahead energy prices shows three clear time-based pricing patterns.

- 1. A year-round low pricing period between midnight and 6 am.
- 2. A summer season (June-Sept) high price period generally between 1 pm and 8 pm with the highest price hours occurring between 3 pm and 6 pm.
- 3. Consistent market prices across other time periods and seasons.
- 4. Non-summer months prices are generally elevated in the morning and evening hours and are softer between noon and 5 pm.

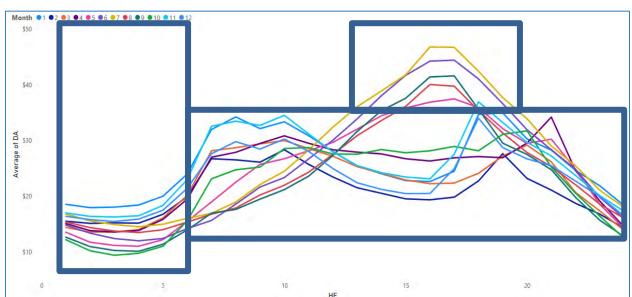


Figure 17: SPP Three Year Monthly Average Hourly Day-Ahead Energy Prices KCP&L-LMP 2017-2019

5.4.2.3 Residential Class Load Analysis

To establish the basis for the TOU rate pricing periods for residential customer classes across all jurisdictions, Evergy performed an analysis of the residential class loading profiles to establish any common characteristics for both the Summer and Non-Summer seasons.

In defining a residential summer peak loading period for all Evergy jurisdictions, the Company first looked at the Evergy residential class load research data for 2019²⁵. Figure 18 shows that the combined Evergy residential load is substantially higher during the four month summer season period (June-September) than during the non-summer period. The monthly residential peak hours occurred during the 5-6 pm (hour ending ("HE") 18) or the 6-7 pm (HE19) hours.

²⁵ The most recent load research data available for Evergy Central was the 2016-2017 test year data used in the last general rates case.

Figure 18 also illustrates that the residential class has a fairly symmetrical load profile around a 4-hour summer peak load period between the hours of 4 pm and 8 pm.

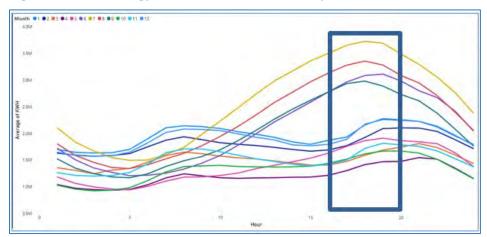


Figure 18: 2019 Evergy Residential Load Profile by Month

While there are slight variations in the residential summer load profiles by jurisdiction, as Figure 19 illustrates, they all follow the Evergy combined profile with the summer average monthly peak hours occurring between 5 pm and 7 pm and the highest residential class load hours generally occurring between 4 pm and 8 pm.

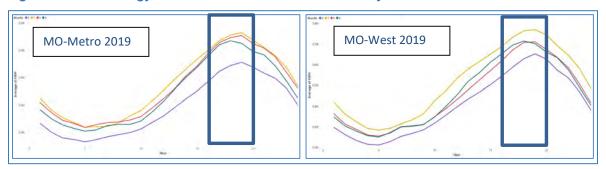


Figure 19: 2019 Evergy Residential Summer Load Profile by Jurisdiction

In defining a residential non-summer peak loading period for all Evergy jurisdictions, the Company further analyzed the Evergy residential class load research data for 2019. Figure 19 shows that the combined Evergy residential class load is substantially lower and less pronounced during the non-summer months than during the four month summer season. Figure 20 shows that the residential non-summer peak load period, while exaggerated by the plot scale, occurs between 5 pm and 10 pm.

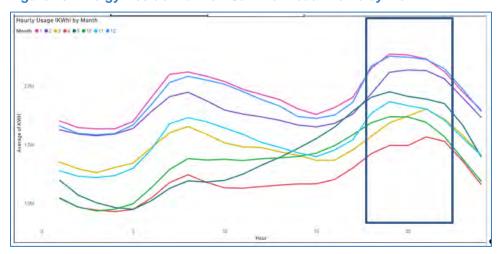


Figure 20: Evergy Residential Non-Summer Load Profile by Month

Figure 21 illustrates the Evergy residential non-summer monthly load profiles by jurisdiction. While there are slight variations in the non-summer load profiles by jurisdiction, the early evening high load period aligns with the Evergy combined profile with the highest residential class non-summer load hours generally occurring between 5 pm and 10 pm.

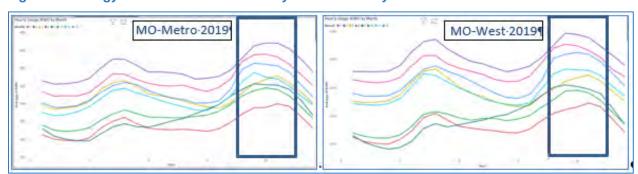


Figure 21: Evergy Res Non-Summer Monthly Load Profile by Jurisdiction

In defining the residential class minimum loading period for all Evergy jurisdictions, the Company first examined the Evergy residential class load profile for 2019. Figure 21 illustrates that the residential 'low-load' generally occurs in the early morning hours, but that there are variations that requires us to look more closely at the Summer and non-summer periods.

Figure 22 shows that the Evergy combined residential classes has a consistent five hour low usage period in the non-summer months between midnight and 5 am. The sixth hour may be the hour before or after depending on the month and weather.

Figure 23 shows that the Evergy combined residential class five hour low usage period occurs later between 2 am and 7 am. The sixth hour may be before or after depending on weather.

Inspection of the residential class load profiles by jurisdiction (Figure 18 and Figure 20) show consistent low load periods for each Missouri jurisdiction.

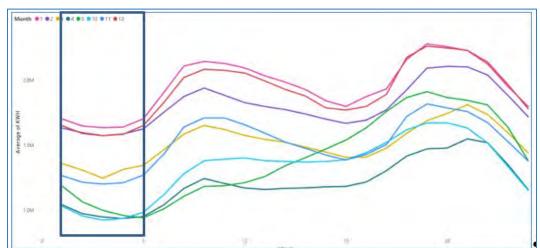
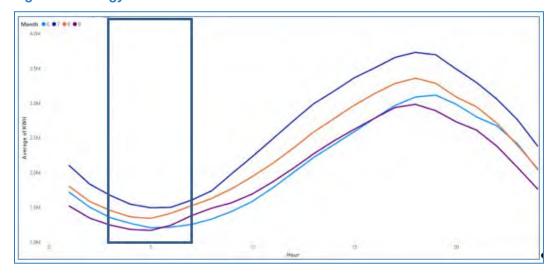


Figure 22: Evergy Residential Non-Summer Low Load Period

Figure 23: Evergy Residential Summer Low Load Period



5.4.2.4 System Cost Analysis

Evergy further analyzed the potential residential TOU pricing periods from a total system cost perspective that included marginal generation costs, embedded transmission and distribution infrastructure costs, and SPP DA energy costs. In developing the hourly system cost profiles the Company allocated the respective system cost components as follows:

- Generation capacity costs: The avoided cost of capacity approved in the Company's
 most recent Missouri Energy Efficient Investment Act ("MEEIA") filing²⁶ was used. This
 generation capacity cost was allocated to the top 100 system net load hours, assuming
 1,000 MW of solar deployed. This level of solar adoption reflects the near-term customer
 Evergy grid scale solar and customer additions identified in the most recent Integrated
 Resource Plan ("IRP").
- Transmission costs: Embedded transmission costs²⁷ were allocated to the system top 25 high-load hours of each month of the year, approximating the driver of SPP transmission charges.
- Distribution costs: Assumed 25% of total embedded residential distribution cost²⁸ is driven by peak demand growth, and were allocated to top 500 residential load hours. This broad allocation reflects the diversity in timing of local distribution peaks.
- Energy costs: are based on the SPP Day-Ahead hourly energy costs.

Figure 24 and Figure 25 show the results of this analysis for the Missouri-Metro jurisdiction for the summer and non-summer seasons, respectively. Since the jurisdictional load profiles are very similar, the results for Missouri-West will be very similar. This analysis show that the 4-hour period with the highest average cost for the summer season occurs between 3 pm and 7 pm. For the non-summer season, the analysis does not indicate any significantly higher cost period, but costs are slightly higher in the early morning and evening hours.

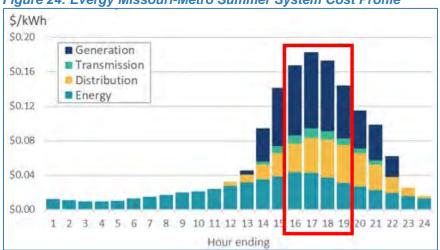


Figure 24: Evergy Missouri-Metro Summer System Cost Profile

²⁶ Docket No. EO-2019-0132

²⁷ Embedded costs were derived from the most recent rate case cost of service study

²⁸ Embedded costs were derived from the most recent rate case cost of service study



Figure 25: Evergy Missouri-Metro Non-Summer System Cost Profile

Since the system cost analysis included a significant number of assumption in cost allocations, we performed additional sensitivity analysis see if changes to the key assumptions changed the 4-hour high cost period. Table 7 shows the results of the sensitivity analysis. The only assumption change that moved the 4-hour high cost period to the 4-8 pm hours was an increase in solar penetration. The 2,500 MW of future solar reflects both the customer and Evergy grid scale solar additions identified in the Company's most recent IRP that are expected to occur over the next 10 years.

Table 7: Summer System Cost Profile Sensitivity Tests

Base Assumption	Alternative Assumption	4-hr High Cost Period
MEEIA Avoided Generation	\$0/kW-yr	3 – 7 pm
Cost	generation capacity cost	
25% of distribution costs	50% of distribution costs	3 – 7 pm
assumed to be capacity driven	assumed to be capacity driven	3 – 7 pm
Distribution costs allocated	Distribution costs allocated	3 – 7 pm
to top 500 hours per year	to top 1,000 hours per year	3 – 7 pm
Assumed 1,000 MW	Assumed 2,500 MW	4 – 8 pm
of future solar	of future solar	4 – 6 pm

Figure 26 shows the modeled impact on the system cost analysis of the higher solar penetration with the summer 4-hour high cost period shifted to 4-8 pm with the 8-9 pm period of almost the same magnitude.

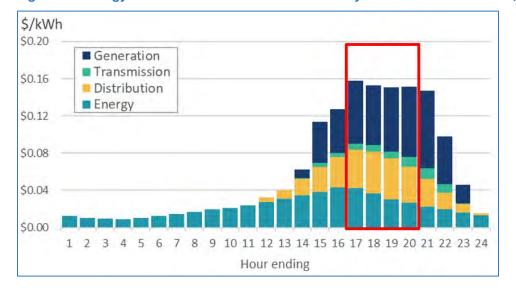


Figure 26: Evergy Missouri-Metro Modeled Summer System Cost Profile with 2,500 MW Solar

5.4.2.5 TOU Time Period Future Proofing Considerations

Most of the empirical evidence based on analysis of historical data presented in the previous sections indicates a 4-hour Summer On-Peak period from 3–7 pm is reasonable. Evergy's current TOU rate offering has a Summer On-Peak period of 4-8 pm which aligns with the residential class 4-hour peak load period. This misalignment begged the question of which period should be used going forward. Evergy considered several additional factors and decided to retain the 4-8 pm period as the summer On-Peak period to future-proof the rate structure to minimize future time period changes. The following factors were part of that consideration:

- Increased solar penetration changes to the net system load profile due to the anticipated increase in current IRP will likely shift the summer system cost profile later in the day as illustrated in Figure 26.
- 'Snap-Back' of TOU load The interim TOU EM&V analysis shows that there is a post TOU On-Peak load 'snap-back' due to the shifting of some load to the post On-Peak hours (Figure 27).

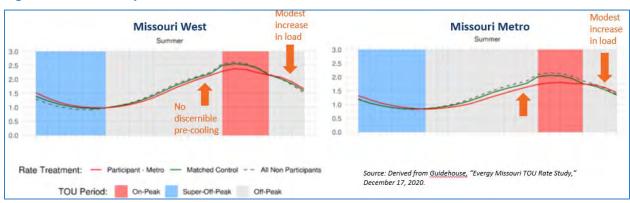


Figure 27: Load 'Snap-Back' after TOU On-Peak Period

5.4.3 TOU Price Differential Analysis

After establishing the daily TOU On-Peak and Super Off-Peak time periods, the Company performed an analysis to determine the target price differential for each time period by season. In this analysis, the residential classes share of costs from the most recent class cost of service study were allocated to the TOU time periods.

Generation costs - The residential class's share of generation capacity costs were allocated based on analysis of the system load duration curve as illustrated in Figure 28, with the goal of allocating incremental costs of capacity only to the periods which "cause" those costs:

- Summer peak period costs are assumed to include peaking generation which runs during a limited number of hours of the year (i.e., 5%)
- All periods are assumed to include costs of generators that run most (i.e., 95%) of the hours of the year
- The remaining share of costs is allocated to the Off-Peak and Non-Summer peak periods

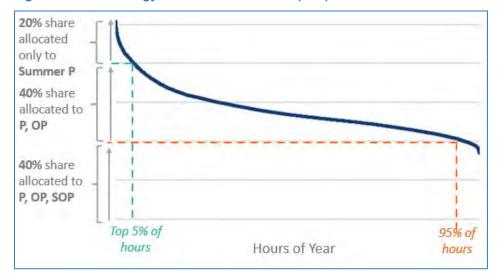


Figure 28: 2019 Evergy Load Duration Curve (MW)

Energy Costs - The residential class's share of energy costs were allocated proportional to Evergy's average SPP energy prices in each period.

Transmission costs - The residential class's share of transmission costs were allocated to the peak period in each month of the year.

Distribution costs - The residential class's share of distribution costs were allocated to reflect that the peak period drives a proportionally higher share of costs

- 25% of total distribution cost is allocated to the summer and non-summer peak periods
- 75% of total distribution cost is allocated to all periods

5.4.3.1 3-Period Price Differential

Using these cost allocations for calculating the prices for a year round 3-period TOU, results in a rate that has a strong summer peak price and a significantly discounted Super Off-Peak price, with modest price differences in the other periods. Table 8 shows the result of the price differential analysis based on the class cost of service costs from the most recent Missouri-Metro and Missouri-West rate cases.

- Current TOU Rate column presents the current Evergy TOU tariff prices which was established to be revenue neutral with the residential general service billing determinants.
- The Current RN ("revenue neutral") Rate column presents the TOU tariff prices that
 would be revenue neutral based on the existing tariff price differentials and the
 settlement billing determinants for both the residential general service and single meter
 space heating customers.
- The Proposed TOU Rate column presents the prices based on revised pricing differentials that would be revenue neutral with billing determinans for both the residential general service and single meter space heating customers.

Note: The pricing is for illustrative purposes only and used determinants from the previous rate case. The actual pricing will likely when the Company makes their general rate case filing.

While there are slight variations in the rate differentials calculated for each jurisdiction they are fairly consistent. Based on this analysis we established the following price differential targets (On-Peak/Off-Peak/Super Off-Peak) targets for the 3-period TOU rates:

Summer: 6.0 / 2.0 / 1.0
 Non-Summer: 3.0 / 1.5 / 1.0

Table 8: 3-Period TOU Price Differential Analysis

		Missouri M	etro		Missouri-V	Vest	
		Current TOU Rate	Current RN Rate	Proposed TOU Rate	Current TOU Rate	Current RN Rate	Proposed TOU Rate
Customer Charge	\$/mo	\$11.47	\$11.47	\$11.47	\$11.47	\$11.47	\$11.47
TOU Charges							
Summer							
On-Peak	\$/kWh	\$0.325	\$0.304	\$0.358	\$0.266	\$0.251	\$0.297
Off-Peak	\$/kWh	\$0.108	\$0.101	\$0.099	\$0.089	\$0.084	\$0.078
Super Off-Peak	\$/kWh	\$0.054	\$0.051	\$0.059	\$0.044	\$0.042	\$0.048
Non-Summer							
On-Peak	\$/kWh	\$0.266	\$0.249	\$0.174	\$0.216	\$0.205	\$0.183
Off-Peak	\$/kWh	\$0.104	\$0.098	\$0.098	\$0.087	\$0.083	\$0.077
Super Off-Peak	\$/kWh	\$0.045	\$0.042	\$0.060	\$0.037	\$0.035	\$0.050
Price Ratios							
Summer		6.0:2.0:1	6.0:2.0:1	6.1:1.7:1	6.0:2.0:1	6.0:2.0:1	6.1:1.6:1
Non-Summer		5.9:2.3:1	5.9:2.3:1	2.9:1.6:1	5.9:2.4:1	5.9:2.3:1	3.6:1.5:1
Heating Customer Im	pact						
Average annual bill	\$		\$1,472	\$1,465		\$1,588	\$1,585
% Increase	%		6.6%	6.1%		3.6%	3.3%

The interim TOU EM&V analysis identified the condition where electric space heating customers on the TOU rate experienced higher bills during the heating season than on their traditional rate. Table 8 shows that the proposed TOU with reduced price differentials in the non-summer season will reduce slightly the impact of TOU for electric space heating customers.

5.4.3.2 2-Period Price Differential

In an effort to provide additional choice for customers beyond the 3-period rate, the Company also evaluated a 2-period TOU rate design that would be a Summer-only TOU option. This option should be attractive to customers with less ability to shift usage throughout the year and address bill impact of the existing TOU rate typically occurring for space heating customers. Table 9 shows the result of the price differential analysis for the Company's proposed 2-period price differential TOU rate to complement the existing 3-period TOU rate. The results of the 3-period price differential analysis were used for calculating the price differentials for the proposed 2-period TOU rate with the following price period definitions:

- Summer: On-Peak 4-8 pm; Off-Peak all other hours
- Non-Summer: Super Off-Peak midnight-6 am; Off-Peak all other hours

For the Summer season, the 2-period On-Peak price was set equal to the 3-period On-Peak price and the Off-Peak price was solved for for the revenue neutrality. For the Non-Summer the 2-period Super Off-peak price was set equal to the 3-period Super Off-peak price and the Off-Peak price was solved for revenue neutrality.

Note: The pricing is for illustrative purposes only and used determinants from the previous rate case. The actual pricing will likely when the Company makes their general rate case filing.

While there are slight variations in the rate differentials calculated for each jurisdiction they are fairly consistent. Based on this analysis the Company established the following price differential targets (Summer On-Peak/Off-Peak and Non-Summer Off-Peak/Super Off-Peak) targets for the 2-period TOU rates:

Summer: 4.0 / 1.0Non-Summer: 2.0 / 1.0

Table 9: 2-Period TOU Price Differential Analysis

		MO-Metro	MO-West
		Proposed TOU Rate	Proposed TOU Rate
Customer Charge	\$/mo	\$11.47	\$11.47
TOU Charges			
Summer			
On-Peak	\$/kWh	\$0.358	\$0.297
Off-Peak	\$/kWh	\$0.091	\$0.073
Non-Summer			
Off-Peak	\$/kWh	\$0.111	\$0.095
Super Off-Peak	\$/kWh	\$0.060	\$0.050
Price Ratios			
Summer		3.9 : 1	4.1 : 1
Non-Summer		1.8 : 1	1.9 : 1
Heating Customer Impact			
Average annual bill	\$	\$1,466	\$1,590
% Increase	%	6.2%	3.7%

5.5 PROPOSED RESIDENTIAL TOU RATES

Based on the TOU rate design analysis presented in the previous sections and feedback from our customers, Evergy proposes to incorporate these refinements to the existing 3-period TOU rate and introduce an optional 2-period TOU rate to provide customers an additional TOU rate option.

5.5.1 3-Period TOU Rate

Although the majority of customers on the existing TOU rate are satisfied with the rate and on average have seen an overall decrease in their electric bills, the Company's TOU analysis indicates that some refinement in the rate design is warranted. Evergy proposes to implement several refinements to the existing 3-period TOU rate in its next general rate case.

Table 10 presents the existing Missouri-Metro and Missouri-West 3-period TOU rate constructs along with the proposed refinements in red text. These refinements for further described in the following sections.

Table 10: Proposed 3-Period TOU Rate Refinements

TOU Period	Missour Pri		Missouri West Price		New Price	Time Period
	(¢/kWh)	Delta	(¢/kWh)	Delta	Delta	
Summer	May 16-Sept. 15		June 1-Sept. 30			June 1-Sept. 30
On-Peak	32.498¢	6.0 X	26.577 ¢	6.0 X	6.0 X	4 - 8 pm, M-F excl. holidays
Off-Peak	10.833¢	2.0 X	8.859¢	2.0 X	2.0 X	All other hours
Super Off-Peak	5.416¢	1.0 X	4.429¢	1.0 X	1.0 X	Midnight - 6 am every day
Non-Summer	Sept 16 – May 15		Oct. 1-May 31			Oct. 1-May 31
On-Peak	26.575¢	5.9 X	21.629¢	5.9 X	3.0 X	4 - 8 pm, M-F excl. holidays
Off-Peak	10.422¢	2.3 X	8.727¢	2.4 X	1.5 X	All other hours
Super Off-Peak	4.449¢	1.0 X	3.667¢	1.0 X	1.0 X	Midnight - 6 am every day
Super Off Peak	% Summer	0.82 X		0.83 X	1.0 X	
Note: Proposed refinements are shown in red text						

5.5.1.1 Season Definition

As discussed in Section 5.4.1, there is considerable empirical support for the selection of this four month summer season rate period. Therefore, Evergy proposes to maintain two seasons, Summer and Non-Summer and revise the current TOU tariffs to reflect a consistent summer season period from June 1 to September 30 for both Evergy Missouri jurisdictions.

5.5.1.2 TOU Time Periods

Evergy does not propose any changes to the TOU time period defined in the current TOU tariff.

Evergy's current TOU rate offerings have a year round On-Peak period of 4-8 pm which aligns with the residential class 4-hour summer peak load period. The residential class's non-summer high-load period, while not as pronounced, generally occurs between 5 pm and 10 pm. Most of the empirical evidence from the analysis of historical system level data supports a 4-hour Summer On-Peak period from 3–7 pm. However, as discussed in Section 5.4.2.5, Evergy has elected to retain the 4-8 pm period as the On-Peak period for the 3-period TOU rate to future-proof the rate structure and minimize future time period changes.

Evergy's current TOU rate offerings have a year round Super Off-Peak period of midnight-6 am. All of the empirical evidence presented in the prior sections clearly support a year-round Super Off-Peak period from midnight- 6 am.

5.5.1.3 TOU Price Differentials

Evergy's current TOU rate offerings have have summer season price differentials (On-Peak/Off-Peak/ Super Off-Peak) of 6.0 / 2.0 / 1.0. Based on the price differential analysis presented earlier, Evergy proposes to maintain these summer proce differential targets.

Evergy's current TOU rate offerings have have non-summer season price differentals (On-Peak/Off-Peak/ Super Off-Peak) of 5.9 / 2.3 / 1.0 with the Super Off-Peak price being approximately 85% of the summer season Super Off-Peak price. Based on the price differential analysis presented earlier, Evergy proposes to revise the TOU tariffs to lower the price differentials and implement differential targets of 3.0 / 1.5 / 1.0 with no, or minimal, difference in the summer and non-summer Super Off-Peak prices.

5.5.1.4 Extreme Weather Considerations

In discussion with stakeholders on March 3, 2021, concern was expressed that the TOU price differentials may be too great and could generate extremely high bills during extreme summer hot spells. Based on this concern, Evergy performed an analysis to evaluate potential bill impact of the TOU rate during extremely hot weather. The analysis shows that a customer on the TOU rate will likely see less of a bill impact during extreme hot weather, especially if they use a programmable thermostat to raise their temperature during the On-Peak time period (see Table 11).

For the most extreme case, Evergy compared the bill impact of a 3-ton (3 kWh/hr) air conditioner running continuously for 24 hours. Under this scenario, a Missouri-Metro customer on the General Service rate would pay (\$10.74/day) 14% more than what they would pay on the TOU rate (\$9.42/day). In a less extreme case where the air conditioner runs 100% during the On-Peak period, 75% during the Off-Peak period, and 50% during the Super Off-Peak period the bill impact on either rate is the same at \$7.80/day.

Table 11: Extreme Weather Comparison for Missouri-Metro

		3 Period TOU				Std Rate	
		On-Peak Hrs	Off-Peak Hrs	S.Off-Peak Hrs	Total Rate	All Hrs	Premium
AC kWh/hr	3						
Hrs/day		4	14	6		24	
Rate		\$ 0.32498	\$ 0.10833	\$ 0.05416		\$ 0.14916	
% Run Time		100%	100%	100%		100%	
kwh/day		12	42	18	72	72	
Cost/day		\$ 3.90	\$ 4.55	\$ 0.97	\$ 9.42	\$ 10.74	114%
% Run Time		100%	75%	50%		72.92%	
kwh/day		12	31.5	9	52.5	52.5	
Cost/day		\$ 3.90	\$ 3.41	\$ 0.49	\$ 7.80	\$ 7.83	100%

5.5.2 2-Period TOU Rate

Evergy proposes to add a 2-period TOU rate to provide our customers an additional TOU rate option that could be attractive to customers with less ability to shift usage throughout the year and address the bill impact of the current TOU rate typically occurring for space heating customers. The proposed rate constructs for the 2-period TOU rate are summarized in Table 12 and further described in the following sections.

Table 12: Proposed 2-Period TOU Rate

TOU Period	Price		Time Period
	(¢/kWh)	Delta	
Summer			June 1-Sept. 30
On-Peak	= TOU On-Peak	4.0 X	4 - 8 pm, M-F excl. holidays
Off-Peak		1.0 X	All other hours
Non-Summer			Oct. 1-May 31
Off-Peak		2.0 X	All other hours
Super Off-Peak	= TOU S Off-Peak	1.0 X	12 - 6 am, every day

5.5.2.1 TOU-2 Season Definition

As discussed in Section 5.4.1, the 2-period TOU rate will have two seasons, Summer and Non-Summer, and with the summer season period from June 1 to September 30 for both of the Evergy Missouri jurisdictions.

5.5.2.2 TOU-2 Time Periods

For the Summer season, the 2-period TOU rate will have an On-Peak period from 4-8 pm consistent with the 3-period TOU rate. All other hours will be Off-Peak. The alignment of Summer On-Peak periods between the TOU rates is to encourage peak load reduction.

For the Non-Summer season, the 2-period TOU rate will have a Super Off-Peak period from midnight-6 am consistent with the 3-period TOU rate. All other hours will be Off-Peak. The alignment of Super Off-Peak periods during the non-summer season encourages shifting load into this low-load, low-cost period to improve system utilization.

5.5.2.3 TOU-2 Price Differentials

Based on the price differential analysis presented earlier, Evergy proposes to set the Summer On-Peak price for the 2-period TOU rate equal to the TOU summer On-Peak price and have an On-Peak to Off-Peak price differential target 4.0 / 1.0. The non-summer Super Off-Peak price for the 2-period TOU rate will be set to the TOU Super Off-Peak price and have an Off-Peak to Super Off-Peak differential target of 2.0 / 1.0.

5.6 EDUCATION PLANS

Educating customers about rate plan options is an ongoing effort and one that can present a unique set of challenges. Rate information is highly detailed, complex, and requires customer effort and time to read and fully understand various rate structures and how changes to those structures impact their bills. Evergy will continue an integrated education and outreach campaign to help increase customer awareness of its rate plan offerings, especially the TOU plan.

Based upon the research and key takeaways from past campaigns, Evergy's strategy will center around the following focus areas:

- Simplify: Deliver education in a clear, concise manner using streamlined visualizations of key information when possible. To develop this message and personalized, data-driven education, the Company will continue to leverage critical technology and infrastructure such as our Customer Care and Billing System, AMI meter network, Meter Data Management system, Rate Education Reports, Online Rate Analysis Tool, Post-Enrollment Rate Coach Reports, and more.
- Connect with new customer segments: Deliver education across an integrated mix of channels proven – through research and historical practices – to be successful in reaching and resonating with new and additional customer segments. The Company will work with customers to help them to understand behavioral changes that may be required to save money on TOU.

- Champion Consistency: Implement a consistent, centralized message on Evergy's
 website. This is a destination to which all other tactics, including direct/in-person
 communication, will drive so customers can easily access additional information and
 education.
- Explaing the Why: Continue to help customers understand the important impacts of TOU and the community and grid benefits the rate structure delivers. Education materials will help customers understand how TOU relates to energy pricing and how they could save money by shifting their usage to Off-Peak times.

In addition, Evergy will continue to execute on our four mains goals from its 2021 TOU campaign, which are:

- Inform all customers on the TOU rate option and how time of day affects electricity pricing, through personalize Rate Education Reports, Online Rate Analysis Tools, and usage and cost visualization tools.
- **Educate** customers on where to find information about the TOU plan option and how the rate plan works.
- Enroll customers in TOU through targeted, data-driven marketing.
- Assist customers who have enrolled in TOU by developing and implementing tools and an
 ongoing communication campaign, through weekly post-enrollment coaching emails, to
 ensure customer success and satisfaction and avert attrition due to plan dissatisfaction.

In additional to individual marketing channel performance, measurement compared to Evergy benchmarks and continued customer post-enrollment and opt-out surveys will be monitored and a TOU awareness question will be added to the Company's Customer Quarterly Tracker survey. This survey will provide a baseline of awareness by end of June 2021 and allow the Company to track awareness over time. The Company's goal for 2021 is to improve overall customer TOU awareness by 5%.

6 APPENDIX A – INTERIM EM&V RESULTS

Below is an excerpt from the Executive Summary, Results and Key Finding of *Guidehouse's Evergy Missouri Residential Time of Use Rate Evaluation*. This interim evaluation has been submitted to the MPSC and presented to stakeholders.

TOU Rate Impacts²⁹

Figure 4 and Figure 5 present the TOU rate impacts for the Missouri Metro and West jurisdictions respectively. The impacts in both the summer and winter seasons are similar across the two jurisdictions with almost all of the impacts being statistically significant at the ninety percent confidence level, which indicates that participants in both jurisdictions did respond to the TOU prices by changing their consumption patterns.

The most notable savings in either season and jurisdiction occur during the on-peak periods as the price differential is the highest during these hours both in comparison to the other TOU periods as well as to the tiered rates (see section 1.2 for additional detail, Table 5 and Table 6). Furthermore, the on-peak period is four hours a day during weekdays, 4 to 8 pm, making it easier to shift consumption than if the on-peak period was longer.

The overall magnitude of the summer impacts, i.e. the kWh impacts, are greater than the winter impacts. However, the difference in the percent impact is closer which is mainly due to summer consumption being higher than the winter. Another potential contributing factor is that winter space heating loads may be less flexible as compared to summer space cooling loads.

It remains to be seen how the impacts change as more participants are available for analysis, but the confidence bands around the interim impact estimates are reasonable, meaning that they are not too wide. (For example, you do not see confidence bands stretch from -0.2 to -1.2 as then it would be difficult to draw reasonable conclusions).

²⁹ Guidehouse's Evergy Missouri Residential Time of Use Rate Evaluation, December 10, 2020; Executive Summary, Results and Key Findings

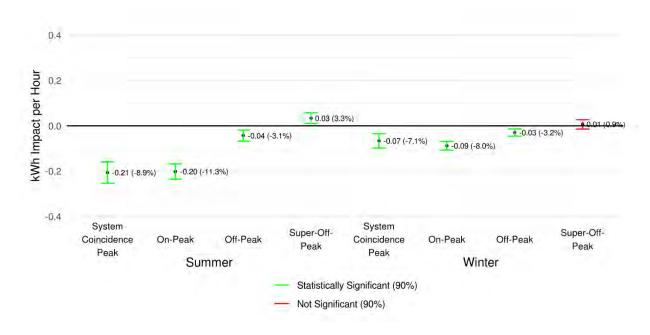


Figure 4. TOU Rate Impacts - Missouri Metro





During the off-peak period, we do see some impacts though the magnitude is much smaller than the on-peak period which is to be expected given that the off-peak price is much lower than the on-peak price. Given the low price offered during the super off-peak period, we see an increase in consumption as participants shift a portion of their consumption from the higher priced on-peak and off-peak periods to the super off-peak period.

During the summer season, the monthly system coincident peak demand impacts are very similar to those of the on-peak period impacts, but the winter system coincident peak demand impacts are lower than those of the on-peak period impacts.

In the summer, the system coincident peak hours always coincide with the on-peak hours during which we see the highest impacts and hence one would expect similar impacts in the summer system coincident peak. However, during some winter months the system coincident peak can occur in the early morning during the off-peak period, and hence one would expect lower system coincident peak impacts in the winter.

Bill Impacts

This compares the average participant's actual bill under the TOU rate compared to what it would have been under the tiered rate structure accounting for both the rate structure changes (i.e. tiered vs. TOU rates) as well as the associated behavioral changes. The impact estimates of the TOU rates for each jurisdiction, presented above, were used to determine what the average participant's consumption would have been in the absence of TOU rates, effectively adjusting for the change in behavior.

Figure 6 and Figure 7 present the total monthly bill impacts for each season as well as on an annual basis for the Metro and West jurisdictions respectively. Given that participants can be on one of two tiered rates prior to enrolling, we separate the bill impacts based on the tiered rates for each jurisdiction. The composition of these bill savings is discussed in section 3.2.2.

The average participant saves approximately six to ten percent on their bills during the summer season. During the winter months, the average general residential participant sees a slight decrease on their bills while the average residential space heating participant sees an increase. On an annual basis, we can see reductions ranging from three to ten percent depending on the tiered rate that an average participant was on prior to enrolling. This is primarily driven by the savings from the summer season. This pattern is consistent across both jurisdictions.

The aggregate level of consumption in the summer season is higher than the winter in both jurisdictions, and hence the associated kWh impacts are much higher as seen above. This means that more energy is shifted out of the on-peak periods in the summer than in the winter. Furthermore, space cooling loads are more flexible compared to space heating loads. Hence, we see a notable reduction ranging from six to ten percent in monthly summer bills.

Given that the aggregate level of consumption in the winter is lower than the summer, the magnitude of the kWh impact is lower meaning less energy is shifted out of the on-peak period. For the average participant who was on the space heating rate prior to enrollment, the behavioral changes are not enough to offset the higher-priced TOU rates and hence we see a bill increase during the winter months.



Figure 6. Total Monthly Bill Impacts of TOU Rates - Missouri Metro

Source: Guidehouse Analysis



Figure 7. Total Monthly Bill Impacts of TOU Rates - Missouri West

Source: Guidehouse Analysis

Key Findings

TOU rates were studied in two jurisdictions within Evergy's service territory in the state of Missouri, Metro and West, using an opt-in quasi-experimental design with matched controls. Each jurisdiction has its own TOU rates. Residential customers who were on the general residential or the residential space heating rate were eligible to opt-into the TOU rate.

The key findings can be summarized as follows:

- The interim results indicate that participants in both jurisdictions did respond to the TOU prices by changing their consumption patterns in both seasons and the patterns are similar across the two jurisdictions.
- The summer kWh impacts are greater than the winter, but the percent impacts are closer due the summer consumption being much higher and winter space heating loads being less flexible as compared to space cooling loads.
- The system coincident peaks in the summer months occur during the on-peak period while in some winter months it can occur in the morning during the off-peak period and hence the summer / winter system coincident peaks are very similar / slightly lower to the on-peak impacts.
- Consistent with the energy and demand impacts, we see higher bill savings in the summer as compared to the winter and the summer savings are the primary drivers of the annual bill savings. Participants who were on the space heating tiered rate prior to enrolling in the TOU rate see a slight increase in their winter bills as compared to those participants who were on the general residential tiered rate.
- Approximately half of the summer bill savings for both rates and the winter bill increases for the space heating rate are driven by the rate structure change, i.e. moving from tiered to TOU rates.

7 APPENDIX B - FUTURE RATE OPTIONS

Below is a summary of future rate options that Evergy has included within its Rate Plan as described in Section 3 of this Report. The following descriptions were presented to stakeholders on March 1, 2021 in its TOU Rate Design Plan Update.

Standard Rate Consolidation

Continued differentiation within the Company's residential rates does not provide significant value and future alignment under more modern rate designs is made more difficult with these variations. The Company has identified the following items to undertake a standard rate consolidation:

- Perform rate clean up and streamlining including review of grandfathered or "frozen" rates to determine which rates can be eliminated. Will potentially require customer impact analysis and feasibility of movement to other rates.
- Look across Evergy jurisdictions and align rate structures where possible to simplify to
 one standard residential rate. The exact timing of this consolidation is still evolving and
 will be influenced by customer impact. Consolidation may need to happen over several
 rate cases and may include tariff revision.
- As rate structures are more aligned, align pricing if/when possible.
- Review tariff differences and align where possible, including potential alignment of operational differences.
- For "new" rates, ensure alignment across Evergy jurisdictions (e.g. structure, pricing, or terms and definitions).

Subscription Pricing

Subscription Pricing offer customers a familiar pricing option so they may choose a level of service and pay according to that level. Subscription Pricing can offer the following attributes:

- Customers pay a fixed monthly bill for energy use
- Price is custom to each customer, based on historic usage and selected perks
- Price is fixed monthly bill for specified term
- In addition to the price, each customer may:
 - Be outfitted with DSM technology giving some level of control of their energy use to the utility
 - o Be given increased discounts the more control they give, the more they save
 - o Be offered incentives, such as bill credits, to reduce peak demand
- Program can be designed to give middle- and lower-income ratepayers access to newer, more efficient technologies and appliances

Prepay Program

A Prepay Program is a billing option that allows customers to pay in advance for their electric service. A Prepay Program can offer the following attributes:

- Prepay gives a customer the freedom of choice and ability to manage their energy costs
- No deposits, no late charges, or connection fees
- Customers choose when, where, and how often to pay
- Participant consumption is reduced, often up to 10%
- Prepay provides potential benefits to the utility
 - Eliminates customer write-offs
 - o Improves cash-flow
 - o Reduces call center costs
- Increases customer satisfaction

More than 200 electric utilities across the US, mostly cooperatives and municipals, offer or are planning to offer an AMI-enabled prepay option

Low-Income Solar Subscription Program

The Company will be offering a low-income solar subscription program in its next rate case to meet the 2018 S&A's.

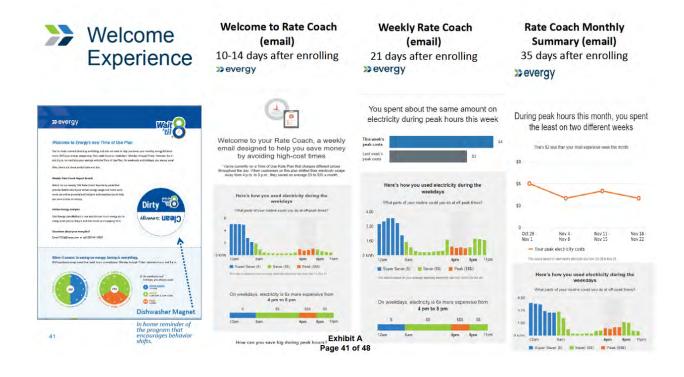
- KCP&L and GMO will propose a low-income component to the solar investment required under section 393.1665 RSMo. no later than their next rate case(s) (Non-Unanimous Stipulation and Agreement filed in these cases on September 19, 2018)
- The Company will consider building SB564-required solar at the same time/place with the understanding that that solar may be used for separate (low-income) projects (Non-Unanimous Stipulation and Agreement filed in these cases on September 25, 2018)

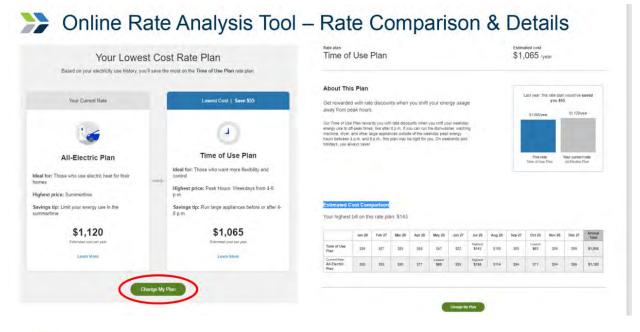
The Company's current work includes:

- Benchmarking other national utility program designs
- Understanding how to overcome any premium of community solar and cross subsidization of a program

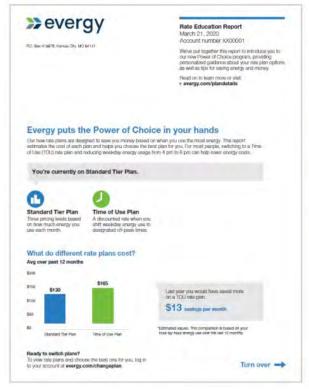
8 APPENDIX C - TOU EDUCATION TOOLS

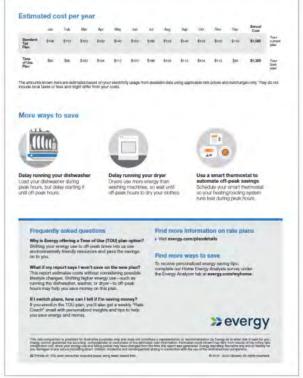
The graphics below include the Welcome Experience and Rate Coach reports, Online Rate Analysis Comparison Tool, and the Rate Education Reports. These are not comprehensive examples of the tools, but are representative examples. These tools have been presented in meetings and presentations identified in Section 2.











9 APPENDIX D- EXEMPLAR TARIFFS

RESIDENTIAL SERVICE - TIME OF USE ELECTRIC (THREE PART TIME OF USE RATE)

AVAILABILITY

Available to single metered Residential customers receiving AMI-metered secondary electric service to a single occupancy private residence or individually metered living units in multiple occupancy residential buildings, on or after October 1, 2019.

Not available to Customers that own and operate generation connected in parallel with the Company's electric system or that receive service under Net Metering tariff (Schedule NM). Not available for Temporary, Seasonal, Three phase Standby, Supplemental, Resale or single metered multi-occupancy Residential Service.

APPLICABILITY

This rate shall be available as an opt-in option to customers otherwise served under the Company's Residential Service (Schedule R) to encourage customers to shift consumption from higher cost time periods to lower-cost time periods.

A Customer exiting the program, disconnected for non-payment, or on a pay agreement may not be allowed to participate in this rate, at the Company's discretion.

Service shall be provided for a fixed term of not less than one (1) year and for such time thereafter until terminated by either party via (30) day written notice. A Customer exiting the program will be required to wait 12 months before they will be eligible to take service under this rate.

RATE, 1RTOU

A. Customer Charge (Per month)	MATCH RESIDENTIAL	GFNFRAI
A. Oustonici Onaruc (i ci monti)	MAI OII NEOIDEN IAE	

B. Energy Charge per Pricing Period (Per kWh)* Summer Winter Season Season

Peak
Off-Peak
Super Off-Peak
Off-Peak
Off-Peak
Super Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-Peak
Off-

*The actual pricing may vary slightly as it will be intended to maintain revenue neutrality.

PRICING PERIODS

Pricing periods are established in Central Time year-round. The hours for each pricing period are as follows:

On-Peak: 4pm-8pm, Monday through Friday, excluding holidays

Super Off-Peak: 12am-6am every day

Off-Peak: All other hours

Holidays are New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

MINIMUM

Minimum Monthly Bill:

- 1) Customer Charge; plus
- 2) Any additional charges for line extensions, if applicable.

SUMMER AND WINTER SEASONS

The Summer Season is four consecutive months, beginning and effective June 1 and ending September 30, inclusive. The Winter Season is eight consecutive months, beginning and effective October 1 and ending May 30.

DEMAND SIDE INVESTMENT MECHANISM RIDER

Subject to Schedule DSIM filed with the State Regulatory Commission.

FUEL ADJUSTMENT

Fuel Adjustment Clause, Schedule FAC, shall be applicable to all customer billings under this schedule.

TAX ADJUSTMENT

Tax Adjustment Schedule TA shall be applicable to all customer billings under this schedule.

REGULATIONS

Subject to Rules and Regulations filed with the State Regulatory Commission

RESIDENTIAL SERVICE – TIME OF USE ELECTRIC (TWO PART TIME OF USE RATE)

AVAILABILITY

Available to single metered Residential customers receiving AMI-metered secondary electric service to a single occupancy private residence or individually metered living units in multiple occupancy residential buildings, on or after October 1, 2019.

Not available to Customers that own and operate generation connected in parallel with the Company's electric system or that receive service under Net Metering tariff (Schedule NM). Not available for Temporary, Seasonal, Three phase Standby, Supplemental, Resale or single metered multi-occupancy Residential Service.

APPLICABILITY

This rate shall be available as an opt-in option to customers otherwise served under the Company's Residential Service (Schedule R) to encourage customers to shift consumption from higher cost time periods to lower-cost time periods.

A Customer exiting the program, disconnected for non-payment, or on a pay agreement may not be allowed to participate in this rate, at the Company's discretion.

Service shall be provided for a fixed term of not less than one (1) year and for such time thereafter until terminated by either party via (30) day written notice. A Customer exiting the program will be required to wait 12 months before they will be eligible to take service under this rate.

RATE, 1RTOU 2 Part

A. Customer Charge (Per month) MATCH RESIDENTIAL GENERAL

B. Energy Charge per Pricing Period (Per kWh)* Summer

Season

Peak Maintain Current Off-Peak Pricing Differential For Summer or 4.0 : 1.

> Winter Season

Off-Peak Decrease Price Super Off-Peak Differential

For Winter to 2.0 : 1.

*The actual pricing may vary slightly as it will be intended to maintain revenue neutrality.

PRICING PERIODS

Pricing periods are established in Central Time seasonally. The hours for each pricing period are as follows:

Summer-

On-Peak: 4pm-8pm, Monday through Friday, excluding holidays

Super Off-Peak: 12am-6am every day

Off-Peak: All other hours

Winter-

Super Off Peak: 12am-6am every day

Off Peak: All other hours

Holidays are New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

MINIMUM

Minimum Monthly Bill:

- 1) Customer Charge; plus
- 2) Any additional charges for line extensions, if applicable.

SUMMER AND WINTER SEASONS

The Summer Season is four consecutive months, beginning and effective June 1 and ending September 30, inclusive. The Winter Season is eight consecutive months, beginning and effective October 1 and ending May 30.

DEMAND SIDE INVESTMENT MECHANISM RIDER

Subject to Schedule DSIM filed with the State Regulatory Commission.

FUEL ADJUSTMENT

Fuel Adjustment Clause, Schedule FAC, shall be applicable to all customer billings under this schedule.

TAX ADJUSTMENT

Tax Adjustment Schedule TA shall be applicable to all customer billings under this schedule.

REGULATIONS

Subject to Rules and Regulations filed with the State Regulatory Commission

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Kimberly Winslow, being first duly sworn, on her oath and in her capacity as Senior Director, Energy Solutions, states that she is authorized to execute on behalf of Evergy Missouri Metro and Evergy Missouri West the foregoing document, and has knowledge of the matters stated in this document, as relevant and detailed within, and that said matters are true and correct to the best of her knowledge and belief.

Kimberly Winslow

Subscribed and sworn to before me this 15th day of June 2021.

My Commission Expires: 4/24/w25

NOTARY PUBLIC - NOTARY SEAL STATE OF MISSOURI MY COMMISSION EXPIRES APRIL 26, 2025 PLATTE COUNTY

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Bradley D. Lutz, being first duly sworn, on his oath and in his capacity as Director, Regulatory Affairs, states that he is authorized to execute on behalf of Evergy Missouri Metro and Evergy Missouri West the foregoing document, and has knowledge of the matters stated in this document, as relevant and detailed within, and that said matters are true and correct to the best of his knowledge and belief.

Bradley D. Lutz

Subscribed and sworn to before me this 15th day of June 2021.

Notary Public

My Commission Expires: $\frac{\mu}{2u}$

ANTHONY R. WESTENKIRCHNER
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 26, 2025
PLATTE COUNTY
COMMISSION #17279952

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Brian A. File, being first duly sworn, on his oath and in his capacity as Director Demand-Side Management and Energy Efficiency, states that he is authorized to execute on behalf of Evergy Missouri Metro and Evergy Missouri West the foregoing document, and has knowledge of the matters stated in this document, as relevant and detailed within, and that said matters are true and correct to the best of his knowledge and belief.

Brian A. File

Subscribed and sworn to before me this 15th day of June 2021.

Notary Public

My Commission Expires: $\frac{4}{2u}$ \w25

ANTHONY R. WESTENKIRCHNER
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 26, 2025
PLATTE COUNTY
COMMISSION #17279952

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Ed Hedges, being first duly sworn, on his oath and in his capacity as Consulting Engineer, Energy Solutions Administration, states that he is authorized to execute on behalf of Evergy Missouri Metro and Evergy Missouri West the foregoing document, and has knowledge of the matters stated in this document, as relevant and detailed within, and that said matters are true and correct to the best of his knowledge and belief.

Ed Hadger Ed Hedges

Subscribed and sworn to before me this 15th day of June 2021.

My Commission Expires: $\frac{4}{2u}/w25$

ANTHONY R. WESTENKIRCHNER
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 26, 2025
PLATTE COUNTY
COMMISSION #17279982

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI



In the Matter of Evergy Metro, Inc. d/b/a) Evergy Missouri Metro's Request for) Authority to Implement a General Rate) Increase for Electric Service)

In the Matter of Evergy Missouri West, Inc.)
d/b/a Evergy Missouri West's Request for)
Authority to Implement a General Rate)
Increase for Electric Service)

File No. ER-2022-0129

Tracking Nos. YE-2022-0200 and YE-2022-0201

File No. ER-2022-0130

Tracking No. YE-2022-0202

AMENDED REPORT AND ORDER

Issue Date: December 8, 2022

Effective Date: December 18, 2022

TABLE OF CONTENTS

COUNSEL	3
PROCEDURAL HISTORY	5
GENERAL FINDINGS OF FACT	7
GENERAL CONCLUSIONS OF LAW	9
SIBLEY	12
AMI-SD	43
SUBSCRIPTION PRICING	52
RATE DESIGN/CLASS COST OF SERVICE	58
RESOURCE PLANNING	76
RATE BASE	76
STREETLIGHTING	85
CNPPID PPA (HYDRO PPA)	93
CONCLUSION	97
ORDERED PARAGRAPHS	98

COUNSEL

EVERGY MISSOURI METRO and EVERGY MISSOURI WEST

Roger W. Steiner, Corporate Counsel, Evergy, Inc. 1200 Main – 16th Floor, Kansas City, Missouri 64105

Karl Zobrist, Dentons US LLP, 4520 Main Street, Suite 1100, Kansas City, Missouri 64111

Jacqueline M. Whipple, Dentons US LLP, 4520 Main Street, Suite 1100, Kansas City, Missouri 64111

James M. Fischer, Fischer & Dority, P.C., 101 Madison, Suite 400, Jefferson City, Missouri 65101

STAFF OF THE MISSOURI PUBLIC SERVICE COMMISSION

Nicole Mers, Governor Office Building, 200 Madison Street, Jefferson City, Missouri 65102-0360

Kevin Thompson, Governor Office Building, 200 Madison Street, Jefferson City, Missouri 65102-0360

Casi Aslin, Governor Office Building, 200 Madison Street, Jefferson City, Missouri 65102-0360

Eric Vandergriff, Governor Office Building, 200 Madison Street, Jefferson City, Missouri 65102-0360

Scott Stacey, Governor Office Building, 200 Madison Street, Jefferson City, Missouri 65102-0360

OFFICE OF THE PUBLIC COUNSEL

John Clizer, Governor Office Building, 200 Madison Street, Suite 650, Jefferson City, Missouri 65101

MIDWEST ENERGY CONSUMERS' GROUP

Tim Opitz, Opitz Law Firm, LLC, 308 E. High Street, Suite B101, Jefferson City, Missouri 65101

SIERRA CLUB

Sarah W. Rubenstein, 319 N. Fourth Street, Suite 800, St. Louis, Missouri 63102

RENEW MISSOURI ADVOCATES

Alissa Greenwald, P.O. Box 413071, Kansas City, Missouri 64141

CHARGEPOINT, INC.

Scott F. Dunbar, 1580 Lincoln St., Suite 1105, Denver, Colorado 80203

MISSOURI INDUSTRIAL ENERGY CONSUMERS

Diana M. Plescia, 130 S. Bemiston, Suite 200, St. Louis, Missouri 63105

GOOGLE LLC

Sean M. Pluta, 100 S. Fourth St., Suite 1000, St. Louis, Missouri 63102

CITY OF ST. JOSEPH, MISSOURI

William D. Steinmeier, 2031 Tower Drive, Jefferson City, Missouri 65109

DOGWOOD ENERGY, LLC

Carl J. Lumley, 130 S. Bemiston, Suite 200, St. Louis, Missouri 63105

NUCOR STEEL SEDALIA, LLC

Marc H. Ellinger, 308 E. High Street, Suite 300, Jefferson City, Missouri 65101

VELVET TECH SERVICES, LLC

Stephanie S. Bell, 308 E. High Street, Suite 300, Jefferson City, Missouri 65101

Regulatory Law Judge: Charles Hatcher

AMENDED REPORT AND ORDER

On November 21, 2022, the Commission issued its *Report and Order* resolving the above captioned case. On December 2, 2022, the Staff of the Commission filed its motion for clarification which raised several questions of interpretation. On December 5, 2022, Evergy filed its response to Staff's motion, a request for reconsideration regarding two areas of concern, and as an alternative to its reconsideration request, Evergy also applied for rehearing. This *Amended Report and Order* makes changes to address many of the questions and areas of concern. No other party filed a request for reconsideration or rehearing.

All requests for rehearing filed regarding the Commission's *Report and Order* issued on November 21, 2022, are moot as this *Amended Report and Order* supplants it. This *Amended Report and Order* will be given a ten-day effective date. All applications for rehearing of this *Amended Report and Order* must be filed prior to this effective date.

Procedural History

On January 7, 2022, Evergy Metro, Inc. (EMM) and Evergy Missouri West, Inc. (EMW) (together, "Evergy") each submitted tariff sheets to produce net increases in their electric base rates, resulting in the two above captioned files. EMM requested a net increase in its electric base rates of approximately \$43.9 million, an increase of 5.20%. EMW requested a net increase in its electric base rates of approximately \$27.7 million, an increase of 3.85%. The cases have not been consolidated, but have had joint filings and a joint evidentiary hearing.¹

The Commission set the test year in both files to be the twelve-month period ending June 30, 2021, updated through December 31, 2021, with the true-up period ending on

¹ 20 CSR 4240-2.110(3).

May 31, 2022. To allow sufficient time to study the effect of the tariff sheets and to determine if the rates established by those sheets are just, reasonable, and in the public interest, both EMM's and EMW's submitted tariff sheets were suspended until December 6, 2022.²

The Commission directed notice of the filings and set an intervention deadline. The Commission granted requests to intervene in both File No. ER-2022-0129 and File No. ER-2022-0130 to the following entities: ChargePoint, Inc.; Missouri Energy Consumers Group (MECG); Renew Missouri Advocates; Sierra Club; Google, LLC; and Missouri Industrial Energy Consumers (MIEC). The following four additional parties were permitted to intervene in File No. ER-2022-0130: the City of St. Joseph; Velvet Tech Services, LLC; Dogwood Energy, LLC; and Nucor Steel Sedalia, LLC.

A series of five virtual public hearings were held from August 8 to August 10.³ An evidentiary hearing was held from August 31 to September 9.⁴ Prefiled testimony was given in addition to testimony taken during the evidentiary hearing. Initial post-hearing briefs were filed on October 14, and reply briefs on October 21.⁵

On various dates before and during the evidentiary hearing, the parties submitted four stipulations and agreements, which were approved by the Commission.⁶ After the Commission approved the agreements, as presented by the parties, nine issues still remained unresolved. One issue, referenced as the Plant-In-Service Act (PISA) deferral

² Date references are to 2022 unless otherwise noted.

³ Transcript Volume (Tr. Vol.) 2-6.

⁴ Tr. Vol. 7-13.

⁵ With the exception of MECG which was granted leave to file and filed its reply brief on October 22.

⁶ Order Approving Four Partial Stipulations and Agreements, issued September 22, 2022.

issue, has been made moot as the Commission addressed it in a separate case, File No. ER-2023-0011.⁷ This Report and Order addresses the eight remaining issues.

General Findings of Fact

- 1. EMM and EMW are two affiliated, certificated Missouri "electrical corporation[s]" and "public utilit[ies]" as those terms are defined at Section 386.020, RSMo (Supp. 2021). EMM and EMW generally serve the western half of Missouri.8
- 2. EMM serves approximately 301,200 customers in the Kansas City metropolitan area and surrounding cities of Missouri.⁹
- 3. EMW serves approximately 337,000 customers in the western and northwestern counties of Missouri, including the cities of Lee's Summit, St. Joseph, and Sedalia.¹⁰
- 4. Kansas City Power & Light (KCP&L) and Aquila were separate utilities prior to their merger in 2008. Following the merger, Aquila was renamed KCP&L Greater Missouri Operations (GMO). The former companies continued to operate as separate utilities with Great Plains Energy Inc. (GPE) acting as the holding company for the stock of both utilities. In 2018, GPE merged with Westar Energy Inc., with KCP&L and GMO being subsidiaries of the combined company. KCP&L and GMO later became Evergy Missouri Metro (EMM) and Evergy Missouri West (EMW).¹¹ Although some referenced documents in the present case may still include former company names, for convenience

⁷ File No. ER-2023-0011, *In the Matter of the Application of Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Authority to Implement Rate Adjustments Required by 20 CSR 4240-20.090(8) and the Company's Approved Fuel and Purchased Power Cost Recovery Mechanism,* Report and Order, effective November 19, 2022.

⁸ Ex. 39 (EMM), Ives Direct, p. 5; and Ex. 113 (EMW), Ives Direct, p. 5.

⁹ Ex. 39, Ives Direct, p. 5; and Ex. 113, Ives Direct, p. 5.

¹⁰ Ex. 39, Ives Direct, pp. 5-6; and Ex. 113, Ives Direct, pp. 5-6.

¹¹ See generally File No. EM-2018-0012, Report and Order issued May 24, 2018; File No. EM-2016-0324, Staff's Investigation Report filed July 25, 2016; and File No. EM-2007-0374, Report and Order issued July 1, 2008.

this order will refer to the current monikers of EMM, EMW, Evergy when combined, or the Company.

- 5. The Office of the Public Counsel (OPC) is a party to this case pursuant to Section 386.710(2), RSMo (2016) and by Commission Rule 20 CSR 4240-2.010(10).
- 6. The Staff of the Commission (Staff) is a party to this case pursuant to Commission Rule 20 CSR 4240-2.010(10).
- 7. The parties presented eight issues for determination by the Commission, listed below:
 - a. Sibley;
 - b. AMI-SD;
 - c. Subscription Pricing;
 - d. Rate Design/Class Cost of Service;
 - e. Rate Base:
 - f. Resource Planning;
 - g. Streetlighting;
 - h. CNPPID PPA (Hydro PPA).¹²
- 8. By a Commission approved stipulation and agreement, the EMM revenue requirement has been set at \$25.0 million and the revenue requirement for EMW has been set at \$42.5 million.¹³ These revenue requirement amounts may be affected by the decisions of the Commission in this Order, which the parties acknowledged in the stipulation by stating "Resolution of [the remaining disputed] issues will have an impact on the revenue requirement."¹⁴
- 9. Cost causation is the principle that costs should be borne by those who cause them to be incurred.¹⁵

¹² Order of Witnesses, filed August 30, 2022.

¹³ Order Approving Four Partial Stipulations and Agreements, issued September 22, 2022, para. 1.

¹⁴ Stipulation and Agreement, filed August 30, 2022, para. 1.

¹⁵ Tr. Vol. 13, p. 943 (referencing the definition given in the book *Energy Utility Rate Setting* by Lowell E. Alt, Jr.).

General Conclusions of Law

- A. EMM and EMW are public utilities and electrical corporations as those terms are defined in Subsections 386.020(15) and (43), RSMo (Supp. 2021). By the terms of the statute, EMM and EMW are electrical corporations and are subject to regulation by the Commission pursuant to Chapters 386 and 393, RSMo.
- B. The Commission's subject matter jurisdiction over EMM and EMW's rate increase requests is established under Section 393.150, RSMo.
 - C. EMM and EMW can charge only those amounts set forth in their tariffs. 16
- D. Subsection 393.140(11), RSMo, gives the Commission authority to regulate the rates EMM and EMW may charge customers for electric service.
 - E. Utilities are required to provide safe and adequate service. 17
- F. In determining the rates EMM and EMW may charge their customers, the Commission is required to determine whether the proposed rates are just and reasonable. 18
- G. EMM and EMW have the burden of proving the proposed rates are just and reasonable, pursuant to Section 393.150.2, RSMo, "[a]t any hearing involving a rate sought to be increased, the burden of proof to show that the increased rate or proposed increased rate is just and reasonable shall be upon the . . . electrical corporation"
- H. In order to carry their burden of proof, EMM and EMW must meet the preponderance of the evidence standard. ¹⁹ In order to meet this standard, EMM and EMW

¹⁶ Sections 393.130 and 393.140, RSMo.

¹⁷ Sections 393.130 and 393.140, RSMo.

¹⁸ Section 393.150.2, RSMo.

¹⁹ Bonney v. Environmental Engineering, Inc., 224 S.W.3d 109, 120 (Mo. App. 2007); State ex rel. Amrine v. Roper, 102 S.W.3d 541, 548 (Mo. banc 2003); Rodriguez v. Suzuki Motor Corp., 936 S.W.2d 104, 110 (Mo. banc 1996), citing to, Addington v. Texas, 441 U.S. 418, 423, 99 S.Ct. 1804, 1808, 60 L.Ed.2d 323, 329 (1979).

must convince the Commission it is "more likely than not" that the proposed rate increases are just and reasonable.²⁰

- I. Witness credibility is solely a matter for the fact-finder, "which is free to believe none, part, or all of the testimony."²¹
- J. Generally, one's belief, feeling, understanding, or thought about a matter does not constitute substantial evidence justifying or permitting a finding to that effect.²²
- K. In determining whether the rates proposed by EMM and EMW are just and reasonable, the Commission must balance the interests of the investor and the consumer.²³ In discussing the need for a regulatory body to institute just and reasonable rates, the United States Supreme Court has held as follows:

Rates which are not sufficient to yield a reasonable return on the value of the property used at the time it is being used to render the services are unjust, unreasonable and confiscatory, and their enforcement deprives the public utility company of its property in violation of the Fourteenth Amendment.²⁴

In the same case, the Supreme Court provided the following guidance on what is a just and reasonable rate:

What annual rate will constitute just compensation depends upon many circumstances and must be determined by the exercise of a fair and enlightened judgment, having regard to all relevant facts. A public utility is entitled to such rates as will permit it to earn a return on the value of the property which it employs for the convenience of the public equal to that generally being made at the same time and in the same general part of the country on investments in other business undertakings which are attended by corresponding risks and uncertainties; but it has no constitutional right to profits such as are realized or anticipated in highly profitable enterprises or

²⁰ Holt v. Director of Revenue, State of Mo., 3 S.W.3d 427, 430 (Mo. App. 1999); McNear v. Rhoades, 992 S.W.2d 877, 885 (Mo. App. 1999); Rodriguez v. Suzuki Motor Corp., 936 S.W.2d 104, 109-111 (Mo. banc 1996); Wollen v. DePaul Health Center, 828 S.W.2d 681, 685 (Mo. banc 1992).

²¹ State ex rel. Public Counsel v. Missouri Public Service Comm'n, 289 S.W.3d 240, 247 (Mo. App. 2009).

²² Dickey Co. v. Kanan, 537 S.W.2d 430, 433-34 (Mo.App.1976).

²³ Federal Power Commission v. Hope Natural Gas Co., 320 U.S. 591, 603, (1944).

²⁴ Bluefield Water Works & Improvement Co. v. Public Service Commission of the State of West Virginia, 262 U.S. 679, 690 (1923).

speculative ventures. The return should be reasonably sufficient to assure confidence in the financial soundness of the utility and should be adequate, under efficient and economical management, to maintain and support its credit and enable it to raise the money necessary for the proper discharge of its public duties. A rate of return may be reasonable at one time and become too high or too low by changes affecting opportunities for investment, the money market and business conditions generally.²⁵

The Supreme Court has further indicated:

'[R]egulation does not insure that the business shall produce net revenues.' But such considerations aside, the investor interest has a legitimate concern with the financial integrity of the company whose rates are being regulated. From the investor or company point of view it is important that there be enough revenue not only for operating expenses but also for the capital costs of the business. These include service on the debt and dividends on the stock. By that standard the return to the equity owner should be commensurate with returns on investments in other enterprises having corresponding risks. That return, moreover, should be sufficient to assure confidence in the financial integrity of the enterprise, so as to maintain its credit and to attract capital.²⁶

L. Furthermore, in quoting the United States Supreme Court in *Hope Natural Gas*, the Missouri Court of Appeals said:

[T]he Commission [is] not bound to the use of any single formula or combination of formulae in determining rates. Its rate-making function, moreover, involves the making of 'pragmatic adjustments.' ... Under the statutory standard of 'just and reasonable' it is the result reached, not the method employed which is controlling. It is not theory but the impact of the rate order which counts.²⁷

M. An administrative agency, as fact finder, also receives deference when choosing between conflicting evidence.²⁸

²⁵ Bluefield, at 692-93.

²⁶ Federal Power Commission v. Hope Natural Gas Co., 320 U.S. 591, 603 (1944) (citations omitted).

²⁷ State ex rel. Associated Natural Gas Co. v. Pub. Serv. Comm'n, 706 S.W. 2d 870, 873 (Mo. App. W.D. 1985)

²⁸ State ex rel. Missouri Office of Public Counsel v. Public Service Comm'n of State, 293 S.W.3d 63, 80 (Mo. App. 2009).

N. The Commission's interpretation of statutes within its purview are entitled to great weight.²⁹

SIBLEY (EMW ONLY)

Findings of Fact:

Sibley Retirement Prudence

- 10. The Sibley Generating Station (Sibley) was a coal-fired power-generating plant consisting of three units built during the 1960s.³⁰
- 11. Two projects extended the depreciable life for approximately 20 years to 2040.³¹ Those projects consist of a 1991 plant conversion to burn low-sulfur coal, and the installation of scrubbers to Unit 3 in 2009.³²
- 12. During the time period of January 2015 through November 2016, Sibley Unit 3 supplied 35% of EMW's energy needs.³³
- 13. The depreciation study filed in February 2016 in EMW's rate case, File No. ER-2016-0156, was based on the assets in service as of December 31, 2014 (2014 Depreciation Study). The 2014 Depreciation Study included a projected end of depreciable life date of December 31, 2019, for Sibley Units 1 and 2, and December 31, 2040, for Unit 3 and the Sibley common plant.³⁴
- 14. EMW's 2012 Integrated Resource Plan (IRP) shows the retirement of Sibley Units 1 and 2 occurring in 2017 as part of EMW's Preferred Plan.³⁵

²⁹ State ex rel. Sprint Mo., Inc. v. Pub. Serv. Comm'n of State, 165 S.W.3d 160, 164 (Mo. banc 2005) (citing Foremost–McKesson, Inc. v. Davis, 488 S.W.2d 193, 197 (Mo. banc 1972)).

³⁰ Ex. 113, Ives Direct, p. 30.

³¹ Ex. 113, Ives Direct, p. 30.

³² Ex. 114, Kennedy Direct, p. 12.

³³ Ex. 308, Marke Surrebuttal, p. 65.

³⁴ Ex. 114, Kennedy Direct, pp. 27-28.

³⁵ Ex. 113, Ives Direct, p. 31.

15. EMW's 2013 and 2014 IRP Annual Updates move the proposed retirement date to 2019.³⁶

16. EMW's 2015 IRP shows that Sibley Units 1 and 2 will stop burning coal in 2019.³⁷

17. On January 20, 2015, Evergy issued a press release announcing that EMW would stop burning coal at Sibley Units 1 and 2 by December 31, 2019.³⁸

18. EMW's 2016 IRP Annual Update restates that Sibley Units 1 and 2 will stop burning coal 2019.³⁹

19. EMW's 2017 IRP Annual Update set forth a fuller retirement plan. The retirement of Sibley Units 2 and 3 (including the Unit 1 boiler and common plant) by 2019 reflected the lowest cost plan from a net present value of revenue requirement (NPVRR) perspective. Those retirements on that timeline would result in a savings of \$282 million over the 2016 IRP, which would make it the lowest cost alternative on an expected value basis.⁴⁰

20. EMW's modeling for the 2017 IRP Annual Update showed that retiring Sibley Unit 3 reduced costs for EMW customers across all 18 modeled scenarios – regardless of load, gas price, or carbon-dioxide (CO₂) price assumption.⁴¹

21. The economic evaluation conducted through the IRP process took EMW's projected load growth and specific generation supply portfolio into consideration when the retirement decision was made.⁴²

³⁶ Ex. 113, Ives Direct, p. 31.

³⁷ Ex. 113, Ives Direct, p. 31.

³⁸ Ex. 114, Kennedy Direct, pp. 24-25.

³⁹ Ex. 113, Ives Direct, p. 31.

⁴⁰ Ex. 113, Ives Direct, p. 31.

⁴¹ Ex. 113, Ives Direct, p. 31.

⁴² Ex. 56, Messamore Rebuttal, p. 4.

22. EMW determined through the IRP process that the retirement of Sibley would reduce the long-term NPVRR and therefore reduce costs to customers going forward as opposed to continuing to operate the plant. The retirement of Sibley Units 1 and 2 in 2017 were first shown to reduce NPVRR in Evergy's 2012 IRP. The retirement of Sibley Unit 3 in 2018 was first shown to reduce NPVRR in Evergy's 2017 IRP Annual Update.⁴³

23. On June 2, 2017, EMW announced by press release it would retire Sibley Units 2 and 3 (including the Unit 1 boiler and common plant) by 2018. The stated factors for the retirement were: the reduction in wholesale electricity market prices; a reduction in the required reserve generating capacity; a decline in near-term capacity needs; the age of the Sibley units; and expected environmental compliance costs.⁴⁴

24. In January 2018, EMW filed a general rate case which included Sibley in rate base as the plant was in operation and expected to be in operation at the true-up date of that rate case, June 30, 2018.⁴⁵

25. EMW's 2018 IRP, filed in April of that year, states that Sibley Units 2 and 3 will retire at the end of 2018.⁴⁶

26. On September 5, 2018, Unit 3 tripped and went off-line due to a turbine vibration event. EMW made a required non-case related filing in the Commission's Electronic Filing and Information System (EFIS) on September 6, 2018, and a follow-up

⁴³ Ex. 56, Messamore Rebuttal, p. 4.

⁴⁴ Ex. 113, Ives Direct, p. 32.

⁴⁵ Ex. 113, Ives Direct, p. 32. EMW's filed general rate case is File No. ER-2018-0146.

⁴⁶ Ex. 113, Ives Direct, p. 33.

non-case related EFIS filing on September 12, 2018, indicating that a preliminary analysis showed the likely impact of the turbine vibration was a repair costing over \$200,000.⁴⁷

- 27. EMW subsequently conducted a root cause analysis of the Sibley Unit 3 turbine vibration event which included an evaluation of the time and expense to repair the unit. The estimated cost to repair was \$2.21 million.⁴⁸
- 28. EMW estimated that \$54 million in capital costs would have been required to keep Sibley operational in the short term, including a submerged flight conveyer, new ash pond, auxiliary boiler, and generator rewind.⁴⁹
- 29. EMW estimated the operation and maintenance (O&M) costs to keep Sibley operational would have been \$28 million per year.⁵⁰
- 30. The costs to keep Sibley in operation exceeded the benefits. The energy benefits did not always cover total fuel costs. Sibley's average annual SPP margins from 2015 to 2017 were only approximately \$4 million. The future capital investment and O&M required to keep the plant operational was forecasted to be \$165 million between 2018 and 2021.⁵¹
- 31. The EMW Vice President of Generation Operations sent two internal emails regarding the retirement of Sibley on October 2, 2018.⁵²
- 32. The first internal Evergy email of October 2, 2018, states in pertinent part, "It is our intention to cease burning coal and move to decommissioning activities. Upon receipt of this email Robert Hollinsworth will contact Eric Peterson to notify [Southwest]

⁴⁷ Ex. 113, Ives Direct, p. 33.

⁴⁸ Ex. 113, Ives Direct, p. 33.

⁴⁹ Ex. 113, Ives Direct, p. 38.

⁵⁰ Ex. 113, Ives Direct, p. 38.

⁵¹ Ex. 56, Messamore Rebuttal, pp. 6-7.

⁵² Ex. 134 Data Requests and email string from File No. EC-2019-0200, pp. 4-5 of 15.

Power Pool (SPP)] and will contact Randy Adams at Local 412. I will forward this email to the rest of the Evergy officer team."⁵³

- 33. The second internal Evergy email of October 2, 2018, states in pertinent part, "This email is to let the Evergy officer team know the direction being taken following a turbine trip due to vibration on Sibley Unit 3. Following a comprehensive evaluation of options we have determined the safest and most economical solution is to cease burning coal at the station and to move the remaining coal currently on the ground to latan."⁵⁴
- 34. An internal reply to the October 2 email was made on October 3, 2018, by Evergy's chief operating officer (and supervisor to the sender of the October 2 email).⁵⁵ That reply states in pertinent part, "We will plan to review such recommendation at the CEO Staff meeting on October 15 in advance of a comparable review with the Evergy Board at the Operations Committee and full Board meeting later this month. Once we've reviewed with the Board, we can then circle back with the management team to review any feedback received and make a final decision."⁵⁶
- 35. On November 1, 2018, EMW held meetings with Staff and OPC to discuss the turbine vibration event and potential retirement later that month.⁵⁷
- 36. On November 10, 2018, the sender of the October 2 email writes that he has received feedback from recent management and Board meetings. He states his plan to move forward with a formal retirement of Sibley, and asks that any objections be raised by the end of the business day November 12, 2018.
 - 37. On November 13, 2018, EMW retired Sibley.⁵⁸

⁵³ Ex. 134 Data Requests and email string from File No. EC-2019-0200, p. 5 of 15.

⁵⁴ Ex. 134 Data Requests and email string from File No. EC-2019-0200, p. 4 of 15.

⁵⁵ Tr. Vol. 8, p. 178.

⁵⁶ Ex. 134 Data Requests and email string from File No. EC-2019-0200, p. 3 of 15.

⁵⁷ Ex. 113, Ives Direct, p. 33.

⁵⁸ Ex. 113, Ives Direct, p. 33.

38. The manual titled "Public Utility Depreciation Rates" published by the National Association of Regulatory Utility Commissioners (NARUC) states, "Ordinary retirements are caused by such factors as wear and tear, decay, action of the elements, inadequacy, obsolescence, changes in the art, and changes in demand." ⁵⁹

39. EMM retired Montrose Unit 1 in 2016 and Montrose Units 2 and 3, including common plant, on December 31, 2018. These retirements were driven by results of the IRP process and were announced on June 2, 2017 (which updated the prior retirement announcement of January 20, 2015). EMW retired Sibley 1 except for the boiler in June 2017 and the remainder of Sibley 1 and Sibley 2 in 2018 when Unit 3 was retired. All of these retirements were considered in IRP filings before retirement and were demonstrated to result in the lowest NPVRR for Missouri customers. 60

40. Sibley provided service for 50 to 60 years, representing a major portion of the expected life of the assets. At the time of retirement, the majority of remaining net book value (NBV) was related to the 1991 and 2009 environmental retrofits.⁶¹

- 41. NBV is the initial plant in service amount less accumulated depreciation. 62
- 42. Increasing the accumulated depreciation reserve reduces NBV and return while decreasing the accumulated depreciation reserve would increase NBV and return.⁶³
- 43. The pace of the developments in renewable technology; a decline in the social acceptance of coal-fired generation; and the onset of federal, state, local and customer carbon-free emission targets changed the economics of Sibley for customers.⁶⁴

⁵⁹ Ex. 114, Kennedy Direct, p. 18.

⁶⁰ Ex. 114, Kennedy Direct, p. 22.

⁶¹ Ex. 114, Kennedy Direct, p. 23.

⁶² Tr. Vol. 8, p. 209.

⁶³ Tr. Vol. 8, pp. 209-210.

⁶⁴ Ex. 114, Kennedy Direct, p. 23.

44. The retirement of Sibley Unit 3 and the Sibley common property in 2018 was the result of a number of factors including, the economics of the plant, the changes in technology providing for the economic development of cleaner generation (for example the introduction of economically feasible solar and wind generation), national environmental requirements, and the changes in the social acceptance of coal fired generation. Evergy states that all of these impacts greatly accelerated in the time between the completion of the 2014 Depreciation Study and late 2018.⁶⁵

45. OPC witness Dr. Marke admitted that the Sibley retirement provided clear environmental and health related benefits.⁶⁶

46. Staff does not dispute the prudence of the decision to retire Sibley.⁶⁷

<u>Sibley AAO</u>

47. Since the Sibley Units 2 and 3 were formally retired after the true-up date in EMW's general rate case, File No. ER-2018-0146, EMW's authorized rates from that rate case would normally include costs, revenues, and investment associated with the Sibley units.⁶⁸

48. The largest component of Sibley's undepreciated investment was the pollution control equipment installed in 2009 to meet clean air requirements,⁶⁹

49. At the time of retirement, Sibley Unit 3 and the Sibley common property were no longer producing energy or expected to produce energy for Evergy. Sibley was no longer used and useful.⁷⁰

⁶⁵ Ex. 114, Kennedy Direct, p. 28.

⁶⁶ Tr. Vol. 8, p. 267.

⁶⁷ Ex. 269, Majors Surrebuttal and True-Up Direct, p. 2.

⁶⁸ Ex. 400, Meyer Direct, p. 9.

⁶⁹ Ex. 114, Kennedy Direct, p. 27.

⁷⁰ Ex. 400, Meyer Direct, p. 10.

- 50. Generally, the accounting for removal from plant-in-service upon retirement would be to credit the book value of the asset and debit the accumulated reserve.⁷¹
- 51. Subsequent to the completion of the 2018 general rate case, and due to the timing of the Sibley retirement, OPC and MECG filed a request for an Accounting Authority Order (AAO) to create a regulatory deferral account for costs and revenues related to Sibley.⁷²
 - 52. The Commission granted the AAO request in File No. EC-2019-0200.⁷³
- 53. The Report and Order in the AAO case, states: "The estimated net book value of each Sibley unit and the common assets at Sibley as of June 30, 2018, as calculated by GMO's witness, is \$145.7 million. Public Counsel's witness estimated that net book value at \$160 million, while MECG's witness estimated that value at \$300 million."
- 54. In the present case, the parties have presented three amounts representing the unrecovered NBV of Missouri jurisdictional Sibley plant using one of three different Commission cases as starting points: ⁷⁵

Evergy	\$145.2 million at 6/30/2018	EC-2019-0200
Staff	\$145.2 million at 6/30/2018	EC-2019-0200
OPC	\$190.8 million at 6/30/2018	ER-2016-0156
MECG	\$300 million at 6/30/2018	ER-2018-0146

⁷¹ Ex. 218, Majors Direct, p. 13.

⁷² File No. EC-2019-0200, Petition for an Accounting Order, filed January 2, 2019.

⁷³ File No. EC-2019-0200, Report and Order, filed October 17, 2019.

⁷⁴ EC-2019-0200, Report and Order, page 9.

⁷⁵ Ex. 310, Robinett Rebuttal, pp. 14-17; Ex. 261, Cunigan Surrebuttal, p. 10.

55. Evergy witness Spanos did not file testimony in the 2018 rate case, File No. ER-2018-0146.⁷⁶

56. The approximate \$145.2 million Sibley NBV proposed by Evergy in this rate case has not been used to set rates before.⁷⁷

57. Evergy witness Spanos' unit and locational calculations filed in File No. EC-2019-0200 would not have impacted the aggregate balances that were used to set rates in the last rate case even if he had filed testimony.⁷⁸

58. Evergy witness Spanos' testimony in File No. EC-2019-0200 based accumulated depreciation reserve calculations on an expected retirement of November 2018 for all Sibley units.⁷⁹

59. The reallocation of the accumulated depreciation reserves from other EMW steam plants to Sibley by EMW occurred at the time Sibley was being removed from the account balance.⁸⁰

60. The depreciation rate would be affected by increasing or decreasing the accumulated depreciation reserve balance given the same time frame.⁸¹

61. Parties in the current rate case stipulated to depreciation rates for the remaining EMW steam plants; latan, Jeffrey Energy Center and Lake Road identical to the depreciation rates previously authorized by the Commission.⁸²

⁷⁶ Tr. Vol. 8, p. 337.

⁷⁷ Tr. Vol. 8, p. 205.

⁷⁸ Tr. Vol. 8, p. 222.

⁷⁹ Ex. 133, Spanos Rebuttal, EC-2019-0200, p. 3.

⁸⁰ Tr. Vol. 8, p. 253-254.

⁸¹ Tr. Vol. 8, p. 255.

⁸² Order Approving Four Partial Stipulations and Agreements, issued September 22, 2022; and Ex. 252, Staff Accounting Schedules.

62. The True-Up Accounting Schedules in File No. ER-2018-0146 recorded plant in service and accumulated depreciation reserve at June 30, 2018, with Sibley still in service.⁸³

63. Staff and Evergy workpapers are \$2 different on plant-in-service (or original cost) and \$1 different on accumulated depreciation reserves. Total difference between Staff and Evergy's true-up positions is \$3.00.84

64. The total Sibley plant-in-service (or original cost) at June 30, 2018 was \$478,109,210 with Missouri jurisdictional Sibley plant totaling \$476,483,639.85

65. Depreciation rates and accumulated depreciation reserves can be calculated many ways. The remaining life technique uses the net plant of surviving plant less book depreciation reserve as the depreciable cost and uses the average remaining service life of the assets. The whole life technique is where the depreciation cost is only the original cost spread out evenly over the average service life of the assets.⁸⁶

66. The 2014 Depreciation Study included Sibley life extensions to 2040.87

67. Evergy's calculations resulted in the book reserve (accumulated depreciation) associated with Sibley as of June 30, 2018, as approximately \$327.2 million which produced a NBV of approximately \$145.7 million.⁸⁸

68. Evergy witness Spanos' assignment of the actual book reserve to the location level in his File No. EC-2019-0200 depreciation analysis is based on the recovery and age of those assets. The only way to calculate book reserve when shifting from the

⁸³ Ex. 310, Robinett Rebuttal, p. 15 and Schedule JAR-R-3.

⁸⁴ Ex. 310, Robinett Rebuttal, p. 16.

⁸⁵ Ex.402, Meyer Surrebuttal, Schedule GRM-1, p. 1.

⁸⁶ Ex. 209, Cunigan Direct, pp. 4-5.

⁸⁷ Tr. Vol. 8, pp. 133-134.

⁸⁸ Ex. 72, Spanos Rebuttal, pp. 21-22.

location level to the vintage level is based on theoretically assigning the book reserve to the vintage level based on the age of the dollars (asset).⁸⁹

69. A theoretical reserve calculation is a snapshot in time that does not trace any collection of depreciation expense on any asset. The calculation assumes that all the prior depreciation expense was adequate, but it does not look at what was actually collected in rates.⁹⁰

70. Evergy witness Spanos agreed that a theoretical reserve calculation should not be the basis of calculating depreciation reserve; however, it should be a basis of how to assign the depreciation reserve to the vintage level based on the ages of the asset.⁹¹

71. Staff first recommended a remaining NBV of \$145.6 million, but subsequently recommended \$300 million if no additional evidence supportive of the \$145.6 million was presented.⁹²

72. Staff witness Majors testified that although Mr. Spanos briefly explains the theoretical reserve method of calculating this amount (\$145.6 million), there is no clear reasoning why this method is superior to the allocated reserve amount included in the 2018 rate case.⁹³

73. Staff witness Majors did a high-level analysis of Sibley plant and accumulated depreciation reserve going back to 2004 (File No. ER-2004-0034) calculating an approximate NBV of \$234 million using approved depreciation rates and

⁸⁹ Tr. Vol. 8, p. 325.

⁹⁰ Tr. Vol. 8, pp. 314-315.

⁹¹ Tr. Vol. 8, p. 325.

⁹² Ex. 254, Majors Rebuttal, p. 4.

⁹³ Ex. 254, Majors Rebuttal, p. 5.

Staff accounting schedules plant in service amounts. His analysis ended at the 2018 rate case. 94

- 74. Staff witness Majors was unable to independently calculate the approximate \$145 million NBV proposed by EMW.⁹⁵
- 75. The \$145.7 million Sibley units net book value put forth by Evergy through Mr. Spanos calculation was determined outside of the 2018 rate case and was never contemplated when setting Evergy's rates.⁹⁶
- 76. OPC witness Robinett calculated the NBV of Sibley based on the 2014 Depreciation Study to be approximately \$190.8 million at June 30, 2018.⁹⁷ Under the 2014 Depreciation Study, the unrecovered balance of Sibley was approximately \$227.1 million at December 31, 2014. Reducing that number by 3.5 years of depreciation expense (approximately \$36.2 million) results in an NBV of \$190.8 million at June 30, 2018.⁹⁸
- 77. OPC witness Robinette has been analyzing depreciation rates and studies of utilities in Missouri and providing expert testimony on behalf of Staff (2010-2016) and OPC (2016 to current) since 2010.⁹⁹
- 78. The 2014 Depreciation Study was the last time a depreciation study was performed that included Sibley prior to the Sibley retirement in late 2018.¹⁰⁰
- 79. The Commission previously ordered the adoption of the life span method dating back to File Nos. ER-2010-0355 and ER-2010-0356. Under the life span method, the generating units should not be looked at as a fleet but as individual units with individual

⁹⁴ Tr. Vol. 8, p. 216.

⁹⁵ Tr. Vol. 8, p. 216.

⁹⁶ Ex. 402, Meyer Surrebuttal, p. 7.

⁹⁷ Ex. 310, Robinett Rebuttal, p. 16.

⁹⁸ Ex. 310, Robinett Rebuttal, p. 18.

⁹⁹ Ex. 309, Robinett Direct, Schedule JAR-D-1.

¹⁰⁰ Ex. 310, Robinett Rebuttal, pp. 14-15.

lives, not as (or similar to) a mass asset. However, EMW continues to apply a mass asset depreciation methodology for book purposes. Because of this depreciation treatment both EMW's and Staff's depreciation analyses in this case have led to a reduction of the accumulated depreciation reserve directly tied to the Sibley property retirement.¹⁰¹

- 80. Evergy has decreased the accumulated depreciation reserve balances for the Jeffrey Energy Center, latan 1 and 2, and Lake Road steam generating units to account for a portion of the undepreciated balance from the Sibley unit retirements.¹⁰²
- 81. The Commission has set depreciation rates on the principle that only known and measurable costs should be included in rates. The historical interim net salvage experienced has been included into the depreciation rates that have previously been ordered by this Commission and are in the depreciation rates currently being recommended by Staff. Only costs that are known and measurable should be included in depreciation expense.¹⁰³
- 82. Evergy maintains depreciation reserve by account and by type of plant (*i.e.* steam production, nuclear production, other production, transmission, distribution, and general plant) not by generating unit. Mr. Spanos performed an allocation of depreciation reserves from a pool of all dollars for steam generation in the complaint case to arrive at his net book value of \$145.7 million. Mr. Spanos assigned reserves to each of the steam generating units for the first time in the complaint case.¹⁰⁴
- 83. Evergy witness Spanos' work papers provided in the complaint case, File No. EC-2019-0200, identify through the five major steam production plant accounts,

¹⁰¹ Ex. 311, Robinett Surrebuttal, pp. 7-8.

¹⁰² Ex. 400, Meyer Direct, p. 14.

¹⁰³ Ex. 311, Robinett Surrebuttal, pp. 8-9.

¹⁰⁴ Ex. 311, Robinett Surrebuttal, p. 10.

approximately \$599 million of theoretical reserve. The difference in amounts between the accumulated depreciation reserve collected in rates through June 30, 2018, and the theoretical reserve, approximately \$175 million, would not have been collected from customers through rates.¹⁰⁵

- 84. Staff agrees that the O&M deferral in the AAO is approximately \$39 million. 106
- 85. MECG agrees that the O&M deferral in the AAO is approximately \$39 million. 107
- 86. The O&M deferral was updated from Evergy's direct filing to \$39,020,260 based on new information from EMW.¹⁰⁸
- 87. The return deferral should be based on the NBV calculated at June 30, 2018. 109
- 88. The average filed rate of return recommendation in File Nos. ER-2018-0145 and ER-2018-0146 (EMM and EMW's most recent general rate cases, respectively) was 8.73%.¹¹⁰
- 89. OPC witness Robinett calculates that the return collected since Evergy's last rate case is approximately \$66.6 million. This calculation relies on an NBV of Sibley based on the 2014 Depreciation Study of approximately \$190.8 million at June 30, 2018, and the average filed rate of return recommendation from Evergy's 2018 rate cases of 8.73% multiplied by four years.¹¹¹

¹⁰⁵ Tr. Vol. 8, p. 322.

¹⁰⁶ Tr. Vol. 8, p. 196.

¹⁰⁷ Tr. Vol. 8, p. 197.

¹⁰⁸ Tr. Vol. 8, p. 196.

¹⁰⁹ Tr. Vol. 8, p. 196.

¹¹⁰ Ex. 310, Robinett Rebuttal, p. 18.

¹¹¹ Ex. 310, Robinett Rebuttal, p. 18.

90. MECG witness Meyer calculated the return to be approximately \$102.9 million based on an 8.576 percent rate of return derived from a 9.5 percent return on equity, and a \$300 million NBV over four years.¹¹²

91. EMW elected PISA accounting on December 31, 2018. 113

92. EMW witness Kennedy forecasted the Sibley AAO costs through November 30, 2022. EMW's return component was calculated with a rate of return of 9.87 percent. The rate base component includes a deduction for Accumulated Deferred Income Taxes (ADIT), Excess Deferred Income Taxes (EDIT), and Net Operating Losses (NOLs) and additions for materials and supplies, and fuel inventory. The subtotal rate base was calculated to be \$125,483,489. When the subtotal rate base is multiplied by the 9.87 percent rate of return and calculated out to November 30, 2022, the return component totals \$49,540,308.¹¹⁴

93. If the net book value of Sibley is calculated using the methods proposed by Mr. Greg Meyer or Mr. John Robinett, then the remaining steam production plant accounts would need to be rebalanced using the same method.¹¹⁵

94. The signatories to the *Stipulation and Agreement* in File No. ER-2018-0146 agreed to defer as a regulatory liability the amounts of depreciation expense included in the cost of service for the Sibley plant from the date of retirement until new customer rates are established in the current rate case. These deferrals reduce the NBV of Sibley by

¹¹² Ex. 400, Meyer Direct, p. 11.

¹¹³ Ex. 308, Marke Surrebuttal, p. 42.

¹¹⁴ Ex. 114, Kennedy Direct, p. 35.

¹¹⁵ Ex. 261, Cunigan Surrebuttal, p. 9.

increasing the depreciation reserve. The Missouri jurisdictional balance of this deferral will be \$41.4 million through November 2022. 116

95. Evergy requests authority for recovery of and to earn a return on the incurred costs of the final decommissioning of Sibley. 117 Evergy argues the net salvage value is part of the service value of the asset, thus the decommissioning costs should be charged to the accumulated depreciation account. 118

96. The amount of labor and non-labor O&M in the Sibley AAO is \$39,020,260, as of November 30, 2022.¹¹⁹

97. The total Sibley depreciation deferred was calculated by EMW to be \$41,448,308, as of November 30, 2022. 120

Amortization Period

98. Staff witness Keith Majors supports netting the regulatory liability against the unrecovered investment in the Sibley Units and amortizing the balance over five vears.¹²¹

99. MECG's witness, Greg Meyer, recommended a 10-year amortization period for the regulatory liability and a 20-year amortization period with no return on the unamortized balance for the unrecovered investment in the Sibley Units. 122

100. The funds in the regulatory liability account were collected from customers over approximately four years.¹²³

¹¹⁶ Ex. 254, Majors Rebuttal, p. 9.

¹¹⁷ Ex. 114, Kennedy Direct, p. 7, and 32.

¹¹⁸ Ex. 114, Kennedy Direct, p. 33.

¹¹⁹ Ex. 46, Klote Surrebuttal, p. 9

¹²⁰ Ex. 114, Kennedy Direct, p. 35.

¹²¹ Ex. 218, Majors Direct, p.141.

¹²² Ex. 400, Meyer Direct, pp. 14-15.

¹²³ Ex. 129, Kennedy Rebuttal, p. 13.

101. If the Commission authorizes recovery of any unrecovered investment in the Sibley Units, OPC witness Dr. Marke recommended that the amortization period match to the 2040 scheduled retirement date of Sibley Unit 3, which is seventeen years from when rates will go into effect in this case.¹²⁴

102. A utility's authorized ROE is to allow the utility an opportunity to earn just and reasonable compensation for their investment in rate base. 125

103. Evergy witness Ives testified that Commission decisions on the issues in these cases could result in a revenue requirement that exceeded the Compound Annual Growth Rate cap (PISA cap) and a performance penalty under Section 393.1655.3, RSMo, (Supp. 2021).¹²⁶

Conclusions of Law:

O. In determining whether a utility's conduct was prudent, the Commission will judge that conduct by:

asking whether the conduct was reasonable at the time, under all the circumstances, considering that the company had to solve its problem prospectively rather than in reliance on hindsight. In effect, [the Commission's] responsibility is to determine how reasonable people would have performed the tasks that confronted the company.¹²⁷

P. The Missouri Supreme Court further affirmed the Commission's rationale in stating,

[t]he PSC ordinarily applies a presumption of prudence in determining whether a utility reasonably incurred its expenses. This presumption of prudence will not survive a showing of inefficiency or improvidence that creates serious doubt as to the prudence of an expenditure. If such a showing is made, the presumption drops out and the applicant has the

¹²⁴ Ex. 306 - EMW, Marke Direct, p. 10

¹²⁵ Ex. 223, Won Direct, p. 7.

¹²⁶ Ex. 42, Ives Surrebuttal, pp. 19-23.

¹²⁷ State ex rel. Associated Natural Gas Co. v. Pub. Serv. Comm'n, 954 S.W.2d 520, 529 (Mo. App. W.D. 1997).

burden of dispelling these doubts and proving the questioned expenditure to have been prudent. 128

Q. In order to disallow a utility's recovery of costs from its ratepayers, a regulatory agency must find both that the utility acted imprudently and that such imprudence resulted in harm to the utility's ratepayers.¹²⁹

R. Commission Rule 20 CSR 4240-22.010 states:

The fundamental objective of the resource planning process at electric utilities shall be to provide the public with energy services that are safe, reliable, and efficient, at just and reasonable rates, in compliance with all legal mandates, and in a manner that serves the public interest and is consistent with state energy and environmental policies.

- S. Resource planning is defined as the process by which an electric utility evaluates and chooses the appropriate mix and schedule of supply-side, demand-side, and distribution and transmission resource additions and retirements to provide the public with an adequate level, quality, and variety of end-use energy services.¹³⁰
- T. Resource plan means a particular combination of demand-side and supply-side resources to be acquired according to a specified schedule over the planning horizon, which is at least 20 years' duration.¹³¹
- U. Resource acquisition strategy means a preferred resource plan, an implementation plan, a set of contingency resource plans, and the events or circumstances that would result in the utility moving to each contingency resource plan.

¹²⁸ Spire Missouri, Inc. v. Pub. Serv. Comm'n, 618 S.W.3d 225, 232 (Mo. banc 2021) (internal citations and quotation marks omitted).

¹²⁹ State ex rel. Associated Natural Gas Co. v. Pub. Serv. Comm'n, 954 S.W.2d 520, 530 (Mo. App. W.D. 1997).

¹³⁰ 20 CSR 4240-22.020(53).

¹³¹ 20 CSR 4240-22.020(43 and 52).

It includes the type, estimated size, and timing of resources that the utility plans to achieve in its preferred resource plan. 132

V. A preferred resource plan is the resource plan contained in the resource acquisition strategy most recently adopted by the utility.¹³³

W. Depreciation, as applied to depreciable electric plant, means the loss in service value not restored by current maintenance, incurred in connection with the consumption or prospective retirement of electric plant in the course of service from causes which are known to be in current operation and against which the utility is not protected by insurance. Among the causes to be given consideration are wear and tear, decay, action of the elements, inadequacy, obsolescence, changes in the art, changes in demand and requirements of public authorities.¹³⁴

X. Retirement units means those items of electric plant which, when retired, with or without replacement, are accounted for by crediting the book cost thereof to the electric plant account in which included.¹³⁵

Y. 12. Records for Each Plant (Major Utility).

Separate records shall be maintained by electric plant accounts of the book cost of each plant owned, including additions by the utility to plant leased from others, and of the cost of operating and maintaining each plant owned or operated. The term *plant* as here used means each generating station and each transmission line or appropriate group of transmission lines.¹³⁶

¹³² 20 CSR 4240-22.020(51).

¹³³ 20 CSR 4240-22.020(46).

¹³⁴ CFR 18, Part 101, *Uniform System of Accounts Prescribed for Public Utilities and Licensees Subject to the Provisions of the Federal Power Act, Definitions.*

¹³⁵ CFR 18, Part 101, *Uniform System of Accounts Prescribed for Public Utilities and Licensees Subject to the Provisions of the Federal Power Act*, Definitions.

¹³⁶ CFR 18, Part 101, *Uniform System of Accounts Prescribed for Public Utilities and Licensees Subject to the Provisions of the Federal Power Act, General Instructions.*

Z. 22. Depreciation Accounting.

A. *Method*. Utilities must use a method of depreciation that allocates in a systematic and rational manner the service value of depreciable property over the service life of the property.

- B. Service lives. Estimated useful service lives of depreciable property must be supported by engineering, economic, or other depreciation studies.
- C. *Rate*. Utilities must use percentage rates of depreciation that are based on a method of depreciation that allocates in a systematic and rational manner the service value of depreciable property to the service life of the property. Where composite depreciation rates are used, they should be based on the weighted average estimated useful service lives of the depreciable property comprising the composite group.¹³⁷

AA. 10. Additions and Retirements of Electric Plant.

A. For the purpose of avoiding undue refinement in accounting for additions to and retirements and replacements of electric plant, all property will be considered as consisting of (1) retirement units and (2) minor items of property. Each utility shall maintain a written property units listing for use in accounting for additions and retirements of electric plant and apply the listing consistently.

- B. The addition and retirement of retirement units shall be accounted for as follows:
- (1) When a retirement unit is added to electric plant, the cost thereof shall be added to the appropriate electric plant account, except that when units are acquired in the acquisition of any electric plant constituting an operating system, they shall be accounted for as provided in electric plant instruction 5.
- (2) When a retirement unit is retired from electric plant, with or without replacement, the book cost thereof shall be credited to the electric plant account in which it is included, determined in the manner set forth in paragraph D, below. If the retirement unit is of a depreciable class, the book cost of the unit retired and credited to electric plant shall be charged to the accumulated provision for depreciation applicable to such property. The cost of removal and

¹³⁷ CFR 18, Part 101, *Uniform System of Accounts Prescribed for Public Utilities and Licensees Subject to the Provisions of the Federal Power Act*, General Instructions.

the salvage shall be charged or credited, as appropriate, to such depreciation account. 138

BB. 403 Depreciation expense.

A. This account shall include the amount of depreciation expense for all classes of depreciable electric plant in service except such depreciation expense as is chargeable to clearing accounts or to account 416, Costs and Expenses of Merchandising, Jobbing and Contract Work.¹³⁹

CC. Section 393.1655, RSMo (Supp. 2021) states, in pertinent part:

1. This section applies to an electrical corporation that has elected to exercise any option under section 393.1400 and that has more than two hundred thousand Missouri retail customers in 2018, and shall continue to apply to such electrical corporation until December 31, 2023.

* * *

3. This subsection shall apply to electrical corporations that have a general rate proceeding pending before the commission as of the later of February 1, 2018, or August 28, 2018. If the difference between (a) the electrical corporation's average overall rate at any point in time while this section applies to the electrical corporation, and (b) the electrical corporation's average overall rate as of the date new base rates are set in the electrical corporation's most recent general rate proceeding concluded prior to the date the electrical corporation gave notice under section 393.1400, reflects a compound annual growth rate of more than three percent, the electrical corporation shall not recover any amount in excess of such three percent as a performance penalty.

Issues Presented by the Parties:

A. Was the retirement of the Sibley generating facility before the end of its useful life prudent?

- 1. If no, what if any disallowance should the Commission order?
- B. What is the appropriate value for the regulatory liability from Case No. EC-2019-0200?

¹³⁸ CFR 18, Part 101, *Uniform System of Accounts Prescribed for Public Utilities and Licensees Subject to the Provisions of the Federal Power Act*, Electric Plant Instructions.

¹³⁹ CFR 18, Part 101, *Uniform System of Accounts Prescribed for Public Utilities and Licensees Subject to the Provisions of the Federal Power Act,* Income Accounts.

- C. What is the amount of unrecovered investment associated with the Sibley Unit Retirements?
- D. What reserve balances should be used for purposes of determining depreciation expense for EMW steam production units, consistent with the Commission's determination of Sibley's unrecovered investment?
- E. What is the proper amortization period for the regulatory liability related to Sibley?
- F. What is the proper amortization period for the unrecovered depreciation investment from the Sibley retirement?
- G. Should the net book value be included in rate base?
- H. Should the Regulatory liability for Sibley include a rate of return on the undepreciated balance from the time of retirement through the rates effective in this rate case?
- I. Should the unrecovered investment in Sibley earn a weighted average cost of capital return on a going forward basis?

Decision:

Sibley Retirement Prudence

The proffered evidence purportedly showing Evergy "gamed" the system are two emails, the timing of the retirement during a rate case, and the amount of undepreciated life remaining.

Both emails of October 2 refer to being sent to the Evergy officer team. This clearly indicates a higher level of approval was necessary. The mention of contacting the SPP and the local labor union can be interpreted as either giving them a heads-up or as official notice of retirement – neither view is conclusive based on the evidence. And, only inference was offered in opposition to the idea that the October 3 email outlined a more formal retirement decision-making process. The Commission does not find the emails to be persuasive evidence that the retirement occurred on or around October 2, 2018, or that Evergy was attempting to game the system.

The planned retirement of Sibley was December 2018. The actual retirement occurred November 13, 2018, but began with the turbine vibration event of September 5, 2018. The true-up date of June 30, 2018, was the cut-off to include assets in rate base during the previous rate case, File No. ER-2018-0146. Generally, all assets used and useful as of that date were included in rate base. The turbine vibration event occurred after the applicable true-up date. EMW got estimates to fix Sibley and subsequently the repair versus retirement decision was reviewed by upper management. EMW also announced the likely retirement of Sibley Unit 3 in its 2017 IRP Annual Update. The Commission finds no persuasive evidence that EMW acted to game the system by purportedly delaying its decision to retire Sibley.

At the time of retirement, Sibley Unit 3 had a depreciation retirement date of 2040. The majority of the undepreciated investment at issue is due to the environmental upgrades occurring in 2009. However, the prudence of those investments is not at issue. Rather, the question is if the retirement of those investments with approximately 20 years of remaining depreciable life was prudent?

Sibley's retirement was the catalyst for OPC and MECG's request for an AAO in File No. EC-2019-0200. In that case, the prudence of the retirement decision was deferred until this rate case. OPC is the only party challenging the prudence of the decision to retire Sibley. OPC questions the prudency of retiring a dispatchable generating unit that was, in one recent time period, contributing approximately one third of EMW's total generation load. OPC argues this transferred too much risk to ratepayers as EMW, without Sibley, has to purchase power in order to meet customer load, which will result in higher customer rates. The Commission does not find OPC's arguments persuasive.

It is undeniable that there is financial risk in predicting power generation and some of that risk will be borne by ratepayers which can reasonably be counted as a detriment. However, in making a decision whether to close Sibley there were also significant definitive detriments to be considered, namely the cost to repair and keep Sibley operational. The estimated cost to repair Sibley Unit 3 was \$2.21 million and an estimated capital investment of \$54 million would have been needed to keep Sibley operational. Additionally, the \$28 million in annual operations and maintenance costs to keep a 60-year-old coal-fired generation plant running had to be considered.

Even without factoring in the cost of repairing Sibley Unit 3, the information and analysis presented in Evergy's 2017 IRP plan showed that the lowest cost from a net present value of revenue requirement perspective was to retire Sibley by end of 2019. Further, even OPC acknowledged there are additional unquantifiable environmental and health benefits to reducing coal fired generation. The Commission does not find the decision to retire Sibley to be imprudent.

Sibley AAO

Regulatory Liability Account

The Commission authorized the deferral of Sibley related costs in File No. EC-2019-0200. The Commission now must decide the amount of regulatory liability resulting from the Sibley deferrals it will allow to flow back to customers.

The deferrals quantify the Sibley related costs that were included in rates from File No. ER-2018-0146 effective December 6, 2018, through the date rates will become effective in this rate case. The parties to the current case agree that the deferral of Sibley labor and non-labor O&M costs to be included in the regulatory liability is \$39,020,260.

Establishing the NBV of the Sibley properties at June 30, 2018, is required for the determination of the return paid by customers in rates. There is generally no dispute as to the original in-service cost of the Sibley plant (total Sibley plant-\$478,109,210, Missouri jurisdictional-\$476,483,639). The original cost of plant in service less the applicable depreciation expense accumulated over time in the accumulated depreciation reserve equals the NBV. The NBV also represents the unrecovered depreciation expense. It is the quantification of the accumulated depreciation reserve balance that creates the NBV difference between the parties. Determining that figure is key to answering many of the other issues presented.

Parties often use the total Sibley original in-service cost, accumulated depreciation reserve amount and NBV, however for purposes of this rate case these amounts will ultimately need to be converted to Missouri jurisdictional exact dollar amounts. The use of approximate amounts and rounding was also used frequently in testimony and during the hearing.

OPC witness Robinett's calculation of the Sibley NBV at June 30, 2018, is the only approach that included the allocation of accumulated depreciation reserve balance between EMW's steam properties as determined by Spanos' 2014 Depreciation Study, which was the most recent depreciation study at the time of the 2018 rate case. The 2019 theoretical reserve analysis performed by Mr. Spanos addresses the Sibley retirement by allocating reserve dollars previously allocated to other EMW steam properties to Sibley, thus reducing Sibley's June 30, 2018, NBV and increasing the NBV of the other steam properties. Once Sibley was retired on November 13, 2018, it was no longer eligible to be included in rate base. Using the 2014 Depreciation Study as a basis to estimate the remaining unrecovered NBV gives consideration to reserve allocation changes prior to

Sibley's retirement. OPC witness Robinett's experience in the analysis of depreciation rates and studies allowed him to determine a NBV at June 30, 2018, by using the 2014 Depreciation Study allocations and applying 3 ½ years of depreciation expense to bring the unrecovered Sibley value in line with plant and reserve in File No. ER-2018-0146. The Commission finds OPC witness Robinett's calculation to be the most credible of the NBV estimates.

MECG argues that the NBV was last established in the 2018 case, File No. ER-2018-0146, and that valuation should remain at \$300 million at June 30, 2018, as it represents the amount used to calculate rates. MECG's NBV position does not consider the 2014 Depreciation Study accumulated depreciation reserve allocations. While the overall return on net rate base was charged to customers through rates set in the 2018 case, no specific amount was assigned to any individual plant. The 2014 Depreciation Study provides a more precise allocation of the accumulated depreciation reserve between EMW's steam properties of which the amounts allocated to Sibley are to be included in determining the return on Sibley's NBV.

Evergy's depreciation expert argues for a NBV of \$145.7 million. However, Evergy's NBV proposal starts with the amount calculated in File No. EC-2019-0200, which is based on the new-in-2018 individual retirement values that were derived using a theoretical reserve. Typically, a theoretical reserve is not used when other information is available.

The Commission is not convinced that once Sibley was retired on November 13, 2018, it was appropriate for EMW to shift Sibley's unrecovered depreciation to other steam properties. The effect of the reallocation proposed by EMW is to allow future return on Sibley stranded costs that resulted from the early retirement of

the properties to be included in future customer rates. The Commission finds the appropriate NBV at June 30, 2018, for the Sibley Units is \$190,833,490.

Next, the appropriate rate of return to use in calculating the return portion of the regulatory liability must be determined. OPC proposes using 8.73 percent which is the average of the rate of return proposed by parties in EMW's last rate case. MECG proposes a 8.576 percent rate of return by using a 9.5 percent return on equity which is based on the PISA statute default rate of return that would not have been applicable in EMW's 2018 rate case since that treatment was not requested by EMW until after the effective date of rates in that rate case. EMW's proposed rate of return is 9.87 percent but they provide no support or explanation of how this seemingly high percentage was derived.

The Commission will calculate the return portion of the regulatory liability based on OPC's June 30, 2018, Sibley NBV of \$190,833,490 multiplied by an 8.73 percent rate of return over the period rate payers have been paying the current rates, December 6, 2018, through November 30, 2022.

The regulatory liability represents costs paid by customers since the 2018 rate case for Sibley related costs that ended upon its retirement in November 2018 that are now being credited to customers. The regulatory liability includes \$39,020,260 of labor and non-labor O&M costs and a return of \$66,639,055 for a total of \$105,659,315.

The Stipulation and Agreement in the 2018 rate case provided for specific treatment of depreciation expense collected after Sibley's retirement. The depreciation amounts would accumulate in a regulatory liability until new customer rates were established in a subsequent rate case. The regulatory liability account would then be closed into accumulated depreciation. This treatment eliminates the need to have the

depreciation expense that was included in rates included in and amortized with the other components of the regulatory liability. This increases the accumulated depreciation reserve and reduces the Sibley NBV at November 30, 2022.

Regulatory Asset

The NBV of the Sibley properties at November 30, 2022, represents the unrecovered depreciation expense or EMW's unrecovered investment. Since the Commission has found the appropriate NBV for the Sibley properties at June 30, 2018, to be \$190,833,490, the NBV at November 30, 2022, can be determined by reducing the June 30, 2018, NBV by the depreciation expense closed to the accumulated depreciation reserve through November 30, 2022 (53 months of depreciation expense). This includes the recognition of depreciation expense of Sibley between June 30, 2018, and the retirement date, November 13, 2018, and the deferral provision of the. Stipulation and Agreement in the 2018 rate case. The NBV at November 30, 2022, is \$145,067,295.

The Commission will also allow EMW to recover a return of its investment in decommissioning and dismantling costs associated with the retirement of the Sibley properties that were not reflected in the June 30, 2018, plant in-service balances. These costs are \$37,186,380. Including the return of these costs in EMW's NBV supports the Commission's practice of not allowing terminal net salvage values in depreciation rates. Therefore, the total regulatory asset is \$182,253,675.

Even though Sibley retired in November 2018, the accumulated depreciation reserve increased from July 1, 2018, and must be included in determining the NBV to be used for amortization of the return of the remaining Sibley investment. The regulatory asset being established in this case allows EMW to recover its undepreciated investment in Sibley that resulted from its early retirement.

Evergy also requests a return on the undepreciated amount of Sibley plant, acknowledging that it is no longer used and useful, and cites an academic treatise in support. Evergy also argues it should earn a return on and return of the NBV of Sibley as there is no authoritative reason not to permit it. Staff, MECG, and OPC argue against any authorized return on the undepreciated amount of Sibley.

Historically, the Commission has distinguished between recovery based on prudent investment and recovery based on the asset being used and useful. The Commission is not persuaded by Evergy's argument and sees no reason to change its prior decisions. While it is appropriate to allow a utility to recover amounts prudently invested in plant, allow it a return of amounts spent, the fact that an initial investment may have been prudent when made does not support authorizing the Company to continue earning a profit/return on that investment when the plant in question is no longer used and useful. The Commission will allow recovery of the undepreciated amount of Sibley plant as the prudency of the investment in Sibley, including the 1991 and 2009 environmental retrofits, is unchallenged. The Commission will not authorize a return on that amount as none of that investment is now used and useful. Since the Commission is not allowing a return on the undepreciated amount of Sibley plant the issue on whether to use a weighted average cost of capital return on a going forward basis is moot.

The Commission's denial of Evergy's request for a return on the undepreciated amount of Sibley plant coincides with its decision that the Sibley NBV should not continue to be included in rate base. This is not based on a judgement of imprudence but a determination that as retired plant Sibley should be removed from Evergy's books. Only the regulatory liability and asset associated with Sibley should be reflected in Evergy's rates going forward.

To avoid having the theoretical reserve developed in File No. EC-2019-0200 applied in the allocation of the accumulated depreciation reserve between EMW's steam properties, the Commission will instruct Staff to work with EMW and OPC to have the EMW steam properties accumulated depreciation reserve amounts going forward from this case correspond to the 2014 Depreciation Study analysis that led to OPC's formulation of its \$190,833,490 NBV at June 30, 2018. The accumulated depreciation reserve balances for other EMW property besides the steam properties will not be affected since the reserve issue in this case applied only in the determination of the 2018 retired Sibley NBV which also then impacted the accumulated depreciation reserve of the other steam properties.

Amortization period

One Amortization or Two

The Commission does not agree with Staff that the unrecovered investment in the Sibley Units should be reduced by the regulatory liability and the balance addressed in a single amortization. It is more appropriate and transparent to keep the two accounts distinct and amortize them separately. The regulatory liability represents Sibley costs included in rates after its retirement in November 2018 that were paid by customers. The regulatory asset represents the undepreciated Sibley plant investment or NBV that the Commission will allow EMW to recover from customers.

Regulatory Liability Amortization

Next the Commission must determine the amortization period over which the regulatory liability should be returned to customers. The regulatory liability was collected from rate payers over approximately four years. MECG and Staff both support an amortization period greater than four years. MECG argued the size of the regulatory

liability warrants a longer period. The Commission does not see any justification to delay rate payer recovery – that is for rate payers to recover over a longer time frame than the four years in which the amount of the regulatory liability was collected from customers. Accordingly, the Commission finds the proper amortization period over which the revenue liability should be credited to customers is the same period over which it was collected from customers, four years.

Regulatory Asset Amortization

Next, we must determine the appropriate amortization period for the regulatory asset. The length of an amortization is typically driven by how large an amount is being amortized, because of its impact on rates, and/or it may be tied to another factor, such as the regulatory liability amortization in this case being set at four years to mirror the period over which those amounts were included in rates. Evergy, OPC and MECG all propose that the amortization period for recovery of the unrecovered investment in the Sibley Units be based upon the projected remaining life of the plant had it not been closed. While the timeframes they recommend vary only based upon their estimates of that remaining useful life, their proposals are vastly different. Evergy seeks recovery over a 20-year amortization period with the assumption it will be earning a return on the unamortized balance over that time frame. OPC and MECG would have recovery over a 17- or 20-year period, without allowing a return on the unamortized balance.

As previously addressed it is not appropriate to allow Evergy to continue to earn a return on plant that is no longer in service, no longer used and useful. So, the question before the Commission is whether it is appropriate to make Evergy wait 17 to 20 years for a full return of its unrecovered investment absent any return on those amounts. The Commission does not find this result reasonable. Evergy should be allowed a return of

these amounts as quickly as practicable. The only other party taking a position on this issue was Staff, who recommended first netting the asset and liability accounts before amortizing the resulting unrecovered asset balance over a five-year period. The Commission has determined it is more appropriate and transparent to treat the regulatory liability and asset accounts independently, and has determined that the regulatory liability should be recovered over a four-year period.

The regulatory asset is not so large as to necessitate use of an extended 17- to 20-year amortization period, but it is almost double the amount of the regulatory liability, which is to be recovered over a four-year period. The Commission finds it appropriate to set the amortization period for the unrecovered investment in the Sibley Units at eight years.

Further, the Commission is mindful that Evergy elected PISA accounting in 2018, and although the PISA deferral issue was made moot by the Commission's decision in File No. ER-2023-0011, Evergy's concern that the revenue requirement authorized in this case might push it over its PISA cap warrants consideration. While there is no clear evidence as to whether a shorter recovery period would push Evergy over its PISA cap, extending the recovery of the regulatory asset over a period greater than the regulatory liability recovery period will decrease the risk of Evergy surpassing the PISA cap.

AMI-SD

Findings of Fact:

104. Automated Meter Infrastructure (AMI) is an integrated system of smart meters, communication networks, and data management systems that enables two-way communication between utilities and customers.¹⁴⁰

¹⁴⁰ Ex. 211, Eubanks Direct, p. 3.

105. AMI meters measure and record electricity usage hourly or sub-hourly. Depending on the manufacturer and model of the AMI meter, other capabilities may be available such as monitoring the on/off status of electric service, measuring voltage, and remotely disconnecting and reconnecting electric service.¹⁴¹

106. EMM and EMW initially began replacing their existing automated meter reading (AMR)¹⁴² meters with AMI meters in portions of its service territories from 2014 to 2016.¹⁴³

107. Evergy historically has installed AMI meters that have different capabilities. 144

108. Evergy first began installing AMI meters with remote service disconnect and reconnect, commonly referred to as AMI-SD meters, in 2017.¹⁴⁵

109. As of September of 2018, EMM's AMI meter penetration was approximately 98% and EMW's was somewhat less than 60%.¹⁴⁶

110. From November 1, 2018, through May 31, 2022, 87% of the meters exchanged were less than 7 years old. 147

111. During the test year and update period (through December 2021), EMM exchanged 49,647 meters and EMW exchanged 22,235 meters. Of the exchanged meters, 99% of meters exchanged were less than 7 years old.¹⁴⁸

¹⁴¹ Ex. 211, Eubanks Direct, p. 3.

¹⁴² AMR meters allow reading from a handheld device or vehicle, within a certain distance from the meter. To contrast, AMI meters can be read from anywhere there is an internet connection.

¹⁴³ Ex. 211, Eubanks Direct, p. 3.

¹⁴⁴ The specifics regarding the manufacturer and model type is confidential and is not at issue except for those meters with the service disconnect and reconnect functionality.

¹⁴⁵ Ex. 21, Caisley Rebuttal, p. 11.

¹⁴⁶ Ex. 211, Eubanks Direct, p.4.

¹⁴⁷ Ex. 262, Eubanks Surrebuttal and True-up Direct, p. 5.

¹⁴⁸ Ex. 211, Eubanks Direct, p. 5.

112. Some of the AMI-SD meters installed during 2019 and 2020 were replacing manual meters as part of the rural EMM AMI meter exchange.¹⁴⁹

113. Staff raised a concern regarding Evergy's premature retirements of the AMI meters still having a significant portion of remaining life being removed and replaced with AMI-SD meters.¹⁵⁰

114. At the time of the initial deployment of AMI, AMI-SD meters were cost prohibitive, more than double the cost of the meters that were installed and nearly 25% higher than prices available today for AMI-SD meters.¹⁵¹

115. The AMI meters installed in 2014 to 2016 had a design life of 20+ years. ¹⁵² Evergy testified that the AMI meters installed in 2014-2016 still had design life left. ¹⁵³

116. Based on Account 370.02 Meters - AMI Distribution in the 2018 true-up accounting schedules through June 30, 2018, EMM had a Missouri Jurisdictional plant-in-service of \$33,812,886 with an accumulated reserve of \$4,081,223. This compares to a plant-in-service of \$61,650,283 with an accumulated depreciation reserve of \$3,211,002 based on Staff's direct accounting schedules through May 31, 2022.¹⁵⁴

117. Based on Account 370.02 Meters - AMI Distribution in the 2018 true-up accounting schedules through June 30, 2018, EMW had a Missouri Jurisdictional plant-in-service of \$21,777,871 with an accumulated reserve of \$1,230,040. This compares to a plant-in-service of \$49,178,779 with an accumulated depreciation reserve of \$2,472,035 based on Staff's direct accounting schedules through May 31, 2022.¹⁵⁵

¹⁴⁹ Ex. 306 - EMW, Marke Direct, p. 15 (see table); Ex. 306 - EMM, Marke Direct, p. 9 (see table).

¹⁵⁰ Ex. 211, Eubanks Direct, p. 7.

¹⁵¹ Ex. 21, Caisley Rebuttal, p. 10.

¹⁵² Ex. 211, Eubanks Direct, p. 5.

¹⁵³ Ex. 21, Caisley Rebuttal, p. 9.

¹⁵⁴ Ex. 310, Robinett Rebuttal, p. 6.

¹⁵⁵ Ex. 310, Robinett Rebuttal, p. 7.

118. OPC's witness Robinett indicated that the changes in plant in service and accumulated depreciation mean that the amount of early retirements has outpaced annual depreciation expense accrual which can be seen by a reduction in the total accumulated depreciation reserves from 2018 to 2022. This is not typical with an increase in plant-in-service over the same period. It would have been expected that depreciation reserve would have continued to increase and should have increased more with the additional plant that was added.¹⁵⁶

119. Evergy has not recorded the AMI meters on the books as 'old' or 'new' nor do they intend to open up a new subaccount for the new meters.¹⁵⁷

120. Evergy intends to complete the replacement of AMI meters with AMI-SD meters by the end of 2024, 158 and possibly as early as the end of 2023. 159

121. Evergy states the AMI meters were replaced with AMI-SD meters for technology reasons.¹⁶⁰

122. The current AMI meters are not being replaced because they are at the end of their useful life but instead to make it easier for customer to be disconnected. 161

123. AMI-SD reconnect functionality allows customers to get service connected within minutes, nearly 24 hours a day, seven days a week. 162

124. To be reconnected currently, it can take one to three days, depending on the timing of the request being after hours or including non-business days. 163

¹⁵⁶ Ex. 310, Robinett Rebuttal p. 6.

¹⁵⁷ Ex. 306 - EMW, Marke Direct, p. 20; Ex. 306 - EMM, Marke Direct, p. 14.

¹⁵⁸ Ex. 211, Eubanks Direct, p. 7.

¹⁵⁹ Tr. Vol. 9, p. 381.

¹⁶⁰ Ex. 21, Caisley Rebuttal, p. 10.

¹⁶¹ Ex. 306 - EMW, Marke Direct, p. 22; Ex. 306 - EMM, Marke Direct, p. 16.

¹⁶² Ex. 21, Caisley Rebuttal, pp. 11-12.

¹⁶³ Tr. Vol. 9, p. 390.

125. Remote disconnect and reconnect addresses safety concerns for the Evergy workers currently physically performing the disconnection, such as dogs, poison ivy, vehicle accidents, or angry confrontations.¹⁶⁴

126. Before replacing the AMI meters with AMI-SD meters, Evergy reviewed the prospect by conducting a business case, and also analyzed the financial impact to customers from two different perspectives.¹⁶⁵

127. The first financial review evaluating the cost to purchase and install AMI-SD meters was based on the proposed change-out schedule and the short-term and on-going O&M savings that would be realized due to the additional capabilities the AMI-SD meters could provide to make operations more efficient. The results indicate that from a financial perspective, customers would be indifferent to the AMI-SD meter change.¹⁶⁶

128. The second financial review calculated the present value of the AMI meters installed in 2014 at \$76 per meter plus the cost to install an AMI-SD meter in 2021 at \$125 per meter. This was then compared to the cost of an AMI-SD meter in 2014 at \$165 per meter. The present value comparison indicated that installing the AMI meter without SD capabilities in 2014 plus installing an AMI-SD meter in 2021 was less expensive than if the Evergy would have installed AMI-SD meters in 2014.¹⁶⁷

129. Staff's assessment of the first financial review conducted by the Company is that it does not demonstrate that there are net cost savings to the AMI-SD meter rollout and it does not include the useful life remaining of the existing AMI meters in its calculations. For the second financial review, Staff assesses that the review simply

¹⁶⁴ Tr. Vol. 9, p. 391.

¹⁶⁵ Ex. 21, Caisley Rebuttal, pp. 9-10.

¹⁶⁶ Ex. 21, Caisley Rebuttal, pp. 15-16.

¹⁶⁷ Ex. 21, Caisley Rebuttal, pp. 15-16.

considers whether or not it would have been a better financial decision for the Company to install AMI-SD meters in 2014; however, no party is suggesting Evergy should have installed AMI-SD meters in 2014.¹⁶⁸

- 130. Staff also raised concerns about the inputs assumed by Evergy in preparing its business case analysis, including the depreciation rate used, personnel needs, and contractual obligations.¹⁶⁹
- 131. Calculating the cost of the new AMI-SD meters must include the cost of the previous AMI meter that is not fully depreciated as well as the cost of labor associated with both the installation of the previous AMI meter and the installation of the new AMI-SD meter.¹⁷⁰
- 132. OPC witness Dr. Marke's assessment of the first financial review is that it omitted a critical variable in the analysis, which was the undepreciated balance of the old AMI meters. The exclusion of the undepreciated balance would indicate that it is no longer a cost to the customers. However, this is not as reflected in Evergy's proposed rate base, which includes the old AMI meter along with the new AMI-SD meter that replaced it, as well as software in rate base.¹⁷¹
 - 133. Evergy presented several benefits of the AMI meters. 172
- 134. None of the benefits that would flow to EMM or EMW from the use of AMI-SD meters were quantified.¹⁷³

¹⁶⁸ Ex. 262, Eubanks Surrebuttal and True-up, p. 6. The 2014 installation of AMI meters is not being challenged as imprudent.

¹⁶⁹ Ex. ²⁶²C, Eubanks Surrebuttal and True-up Direct, pp. 7-8 (The Commission notes the particular information is confidential, and thus will not be restated).

¹⁷⁰ Tr. Vol. 9, p. 425

¹⁷¹ Ex. 308, Marke Surrebuttal, p. 31.

¹⁷² Ex. 49, Lutz Direct, pp. 36-39; and Ex. 117, Lutz Direct, pp. 36-39.

¹⁷³ Tr. Vol. 9, p. 435 - 436

135. The reasons for the individual meter exchanges during the test year, as provided in Evergy's field notes, were broken down by Staff into categories in descending order of the most common to least common as follows:

- a. To exchange an AMI meter with an AMI-SD meter;
- b. To exchange an AMI meter with an AMI-SD meter due to customer arrears;
- c. Communication issues;
- d. Unknown reasons;
- e. Net meter installations;
- f. Other (damaged or failing meters, access issues, and customer-requested exchanges). 174
- 136. Staff recommended disallowances of meter exchanges where the reason identified in the field notes was for one of the three reasons (1) the exchange was for the purpose of exchange (category a); (2) when the exchange was due to customer arrears (category b); and (3) for unknown reasons (category d).¹⁷⁵
- 137. Evergy testified to the benefits to the customer and the Company of prioritizing customers with balances in arrears for meter exchange. Evergy forecast that post-COVID, an atypically high number of customers would have balances in arrears. Evergy was concerned that if a high number of customers were disconnected, many of them could end up waiting hours for reconnection once a payment was made or a plan established. Evergy argued that meter exchanges to AMI-SD meters for customers with balances in arrears was to ensure that they could be more quickly restored to service with an AMI-SD meter than with a technician physically present to restore service. ¹⁷⁶

¹⁷⁴ Ex. 211, Eubanks Direct, pp. 5-6.

¹⁷⁵ Ex. 211, Eubanks Direct, p. 6.

¹⁷⁶ Ex. 21, Caisley Rebuttal, pp. 18-19.

138. The meter exchanged for "unknown reasons" could come from two places – an order entered without comments or field personnel deciding on a meter exchange while on location. Field personnel making this type of exchange is considered a "pick-up" order by Evergy's system, without a way to enter the reason for the exchange. 177

139. Staff adjusted its recommended initial disallowance to remove meter exchanges that were listed in the unknown category when there was a meter reader or field employee request for the exchange.¹⁷⁸

140. While it is reasonable and necessary to replace a meter that is damaged or failing; given that the vast majority (99%) of AMI meters exchanged for AMI-SD meters were less than 7 years old, it is not reasonable to replace a meter solely to gain a new capability or when there is seemingly no reason.¹⁷⁹

141. Staff recommends that the Commission disallow \$6,321,846 for EMM and \$2,957,124 for EMW FERC Account 370.2, respectively.¹⁸⁰

142. Staff multiplied the number of meters per category of recommended disallowance by the cost per meter (depending on meter type) to arrive at its recommended disallowance.¹⁸¹

143. OPC's cursory review of Evergy's PISA filings suggest that both EMM and EMW may have exceeded the statutory limits on smart meter investment in 2020 for EMM and 2019 for EMW. OPC recommended that this be added to the list of issues where OPC can provide a recommendation in its position statement.¹⁸²

¹⁷⁷ Ex. 21, Caisley Rebuttal, p. 21.

¹⁷⁸ Ex. 262, Eubanks Surrebuttal and True-up Direct, pp. 4-5.

¹⁷⁹ Ex. 211, Eubanks Direct p. 6.

¹⁸⁰ Ex. 262, Eubanks Surrebuttal and True-up Direct, p. 3.

¹⁸¹ Ex. 262, Eubanks Surrebuttal and True-up Direct, p. 3.

¹⁸² Ex. 308, Marke Surrebuttal, pp. 42-43.

Conclusions of Law:

No additional Conclusions of Law are necessary.

Issues Presented by the Parties:

- A. Should the Commission approve a disallowance related to the replacement of AMI meters with AMI meters that have the capability to disconnect/reconnect service (AMI-SD)?
- B. Should the Commission order Evergy Metro to change its deployment strategy so that it no longer prioritizes customers in arrearage?
- C. Did Evergy exceed the 6% annual PISA spend limit on AMI meters?1. If yes, what actions, if any, should the Commission take in response?

Decision:

The Commission agrees with Staff's position that the premature retirement and replacement of AMI meters that still function with AMI-SD meters was not prudent. The Commission therefore will order a disallowance of the AMI-SD meters installed for the three reasons established in Staff's estimate, which were (1) exchange of AMI meter for AMI-SD meter; (2) exchange of AMI meter for an AMI-SD meter due to customer arrears; and (3) unknown reasons.

Evergy witnesses testified that prioritizing customers with balances in arrears for meter exchange was a benefit to customers and the Company. Evergy argued that with the possibility of large numbers of disconnections post-COVID, it was beneficial to those customers in arrears (and thus more likely to experience an involuntary shut-off) because they could more quickly have electricity restored if shut-off. The Commission does not find this rationale credible. Replacement of functioning meters with significant remaining life is, without further valid justification, not just and reasonable.

Installing an AMI-SD meter for the purpose of installing an AMI-SD meter is not a prudent reason for a meter exchange when the meter being taken out is likely only 7 years

into a 20-year depreciable life. This reasoning is not improved by prioritizing customers in arrears. Similarly, after being adjusted to remove those meters exchanges initiated by the Evergy field personnel, the meters exchanged for unknown reasons were not sufficiently supported in evidence with a valid reason for the exchange of an AMI meter with substantial life remaining. The Commission finds that Evergy has not met its burden of proof regarding the meter exchanges for the three reasons outlined by Staff.

OPC recommended a disallowance of all AMI-SD meters. The Commission disagrees as OPC's recommendation is premised on the assumption that the installation of AMI-SD meters was unjustified and provided no benefit. The Commission does not question the overall benefits provided by AMI-SD meters over AMI meters. There is value in the upgraded technology and benefits provided with the AMI-SD meter. In this case, the benefits of the AMI-SD meters provide value when installed for justifiable reasons, such as replacing manual meters, or an AMI meter that is not functioning.

OPC also presented a question in surrebuttal testimony that Evergy, in purchasing the AMI-SD meters, may have exceeded its PISA limit. However, testimony stated it was based on a cursory review and only recommended further discussion. Of concern to the Commission is that the testimony only suggests that this may be an issue. The lack of evidence regarding this issue precludes a Commission decision at this time.

SUBSCRIPTION PRICING

Findings of Fact:

144. EMM and EMW proposed an opt-in Subscription Pricing Pilot Program (Subscription Pricing).¹⁸³

¹⁸³ Ex. 37 (EMM), Hledik Direct, p. 3; and Ex. 112 (EMW), Hledik Direct, p. 3.

145. Evergy has conducted customer surveys regarding Subscription Pricing. 184

146. The first survey consisted of 39 customers, and the second survey was

online.185

147. One of the questions posed in Evergy's first survey was "do you want

unlimited electricity for a fixed price?"186

148. Evergy explained that they referenced an "unlimited" electric plan so that

the survey participant can draw a comparison with other "unlimited" plans consumers are

traditionally familiar with, such as their subscription with Netflix or wireless phone

provider. In other words, the consumer is not charged on a per unit basis (number of

movies watched or number of minutes used). They are charged on a flat, monthly price. 187

149. Evergy stated it will not market or promote subscription pricing to customers

as an "unlimited" rate plan. 188

150. Evergy also distinguished that it was the 2021 customer survey that

mentioned the word "unlimited". Evergy states the June 2022 customer survey presented

the option as a "Flat Pricing Plan" and was still desired by customers. 189

151. The description of Flat Pricing that was given in the survey compared it to

an unlimited plan for an unrelated subscription service, specifically using the word

"unlimited". 190

¹⁸⁴ Tr. Vol. 10, p. 636.

¹⁸⁵ Tr. Vol. 10, p. 629.

¹⁸⁶ Tr. Vol. 10, pp. 636-637.

¹⁸⁷ Ex. 84, Winslow Surrebuttal, p. 20.

¹⁸⁸ Ex. 84, Winslow Surrebuttal, pp. 20-21.

¹⁸⁹ Ex. 84, Winslow Surrebuttal, pp. 20-21.

¹⁹⁰ Ex. 84, Winslow Surrebuttal, p. 20; Ex. 22, Caisley Surrebuttal, Confidential Schedule CAC-5, p. 35 of

42.

152. Subscription Pricing would provide residential customers with an entirely fixed monthly electric bill, similar to subscription-based services and club memberships.¹⁹¹

153. Subscription Pricing removes pricing signals important to programs like cost-based and time of use rates. 192

154. Subscription Pricing's fixed bill would be based on historical usage of the previous twelve months of weather normalized usage. The customer's bill would remain unchanged for a one-year term. After each one-year term, the usage would be re-averaged for the next one-year term, but there is no true-up.¹⁹³

155. Evergy's customer survey reflected interest in the program for moderate-income households seeking a stable electric bill but renters and low-income customers did not find this plan to fit their lifestyle.¹⁹⁴

156. Evergy is a monopoly that provides an essential service and does not provide competitive non-essential services like gym memberships or streaming entertainment services.¹⁹⁵

157. There are thirteen utilities in the United States offering a subscription pricing program.¹⁹⁶

158. Subscription Pricing, as proposed, is a complex pricing process with a behavioral usage adder, a program cost adder, risk premium adder, efficiency incentive, and other add-on options.¹⁹⁷

¹⁹¹ Ex. 37, Hledik Direct, p. 3; and Ex. 112, Hledik Direct, p. 3.

¹⁹² Tr. Vol. 10, p. 619, 18-23.

¹⁹³ Ex. 37, Hledik Direct, p. 5 and 19; and Ex. 112, Hledik Direct, p. 5 and 19.

¹⁹⁴ Ex. 82, Winslow Direct, pp. 22-23.

¹⁹⁵ Ex. 242, King Rebuttal, p. 12.

¹⁹⁶ Tr. Vol. 10, p. 504.

¹⁹⁷ Ex. 242, King Rebuttal, p. 12; and see Tr. Vol. 10, pp. 500-503, and 580-581.

159. Subscription Pricing uses weather normalization applied by class to calculate a given Subscription Pricing enrollee's bill. 198

160. Customers of Subscription Pricing would, on average, pay more under Subscription Pricing than they otherwise would under a standard rate. 199

161. Evergy seeks waivers of certain mandated billing and payment standards set by Chapter 13 of the Code of State Regulations.²⁰⁰

162. Customers may not be able to understand the complex structure of all of the components which make up the ultimate flat rate offered by the Subscription Pricing program.²⁰¹

163. A level pay tool already exists for Evergy customers in the form of the Average Payment Plan.²⁰²

164. Average Payment Plan participants are exposed to weather-related fluctuations changes in usage, which is different from the proposed Subscription Pricing Plan.²⁰³

165. OPC recommended a disallowance for the fees associated with Evergy's consultant testimony in regards to Subscription Pricing, stating it is out-of-line with Commission policy.²⁰⁴

Conclusions of Law:

No additional Conclusions of Law are necessary.

¹⁹⁸ Tr. Vol. 10, pp. 578-579.

¹⁹⁹ Ex. 323, Kremer Rebuttal, Schedule LAK-R-6; and see Tr. Vol 10, pp. 512-517.

²⁰⁰ Ex.242, King Rebuttal, pp.11-12.

²⁰¹ Ex. 38, Hledik Surrebuttal, pp. 10-11.

²⁰² Ex. 323, Kremer Rebuttal, p. 14 and 16.

²⁰³ Ex. 38, Hledik Surrebuttal, p. 8.

²⁰⁴ Ex. 307, Marke Rebuttal, p. 21.

Issues Presented by the Parties:

- A. Should the Commission approve the proposed Subscription Pricing Pilot Program?
- B. Should the Commission grant Evergy's request for variances to Chapter 13.020 Billing and Payment Standards, which the Company states is needed to implement Evergy's proposed Subscription Pricing Pilot Program?
- C. Should the Commission disallow costs related to consultant fees associated with Evergy's Subscription offering?

Decision:

Evergy argues that its two surveys show that customers want Subscription Pricing. A question in the first customer survey mentions unlimited energy and only involves thirty-nine customers. The second survey was conducted online. The second survey can be interpreted to show that customers prefer what the survey calls "Flat Pricing" when offered a choice among the several of Evergy's proposed rates. However, the description of Flat Pricing that was given in the survey used the word "unlimited" and compared Flat Pricing to a plan for an unrelated subscription service. In addition, the results of the survey showed the preference for this type of plan was skewed towards moderate-income households but not renters and low-income customers. While every utility offering may not be preferential for every customer type, alienating a specific customer group which is already at a disadvantage further erodes the desirability of this proposal. The Commission does not find the results of either survey to be credible support for Subscription Pricing.

Subscription Pricing, by Evergy's own admission, removes elements such as weather-related fluctuations in usage which operate as pricing signals to customers in conjunction with rate structures such as TOU rates. The success of TOU rates could be undermined by participation in a program structured like Subscription Pricing.

There is also the unchallenged fact that Subscription Pricing will likely result in higher bills for participants. Because Subscription Pricing, absent other factors, is more likely than not to result in higher bills to customers, the Commission finds it would likely result in unjust and unreasonable rates.

The Commission has set rules that offer protections to utility customers for billing structure to ensure that customers understand what they are being billed and the reasoning for those charges. Evergy asks for variances from these rules to offer customers a bill that reflects only the price of service, but not the detailed breakdown behind it. Evergy by its witness' own admission expects that customers would not comprehend all of the details comprising their bills under the Subscription Pricing program proposal. The Commission is further not persuaded that the Program or its waivers are appropriate.

OPC recommended the Commission disallow the costs of the consultant who testified and put together the Subscription Pricing proposal. OPC argues that the rate design is inherently illegal and so out-of-line with Commission policy that ratepayers should not have to pay for the consultant's testimony supporting that rate design. The Commission is not fully persuaded by OPC's argument, and finds it appropriate to divide the cost equally between shareholders and ratepayers. While this proposed pilot program was ultimately rejected, the Commission does not want to stifle innovation. Therefore, the Commission finds it appropriate that both shareholders and ratepayers should contribute to the cost of this proposal and will disallow 50% of the cost of the Subscription Pricing consultant.

RATE DESIGN/CLASS COST OF SERVICE

Findings of Fact:

- 166. Evergy's immediately preceding general rate case included an agreement regarding rate design issues, specifically supporting Time of Use (TOU) rates, but with no specific measurable goal or timeline.²⁰⁵
- 167. Starting immediately after its rate case approvals in 2018, the Company began executing on its commitments from the rate design agreement.²⁰⁶
- 168. Evergy then researched, developed, and implemented a 3-period, opt-in TOU rate plan (Whole House) for residential customers as a pilot.²⁰⁷
- 169. An opt-in structure is such that the default is a flat rate or a blocked/tiered rate and a customer may choose to have a time varying rate. The choice of remaining on the status quo flat or blocked/tiered rate is the choice of the customer.²⁰⁸
- 170. An opt-out structure is such that all customers are placed on a TOU rate, which requires a customer to take action to revert to the flat or blocked/tiered rate, or select another rate within the utility's portfolio of rates.²⁰⁹
- 171. Evergy's pilot resulted in 1.1% of the residential customers enrolled in TOU rates over a 20-month period.²¹⁰
- 172. Evergy conducted surveys which showed customers wanted more rate options, but were hesitant regarding a mandatory TOU rate.²¹¹

²⁰⁵ Ex. 82 (EMM), Winslow Direct, p. 5; and Ex. 128 (EMW), Winslow Direct, p. 5.

²⁰⁶ Ex. 82, Winslow Direct, p. 5; and Ex. 128, Winslow Direct, p. 5.

²⁰⁷ Ex. 82, Winslow Direct, p. 5; and Ex. 128, Winslow Direct, p. 5.

²⁰⁸ Ex. 49 (EMM), Lutz Direct, Schedule BDL-3, p. 36 of 89; Ex. 117 (EMW), Lutz Direct, Schedule BDL-3, p. 36 of 89.

²⁰⁹ Ex. 49, Lutz Direct, Schedule BDL-3, p. 36 of 89; Ex. 117, Lutz Direct, Schedule BDL-3, p. 36 of 89.

²¹⁰ Ex. 49, Lutz Direct, Schedule BDL-3, pp. 36-37 of 89; Ex. 117, Lutz Direct, Schedule BDL-3, pp. 36-37 of 89.

²¹¹ Ex. 23, Caisley Surrebuttal, pp. 6-7.

173. Evergy in this case proposed new opt-in TOU rates with the primary goals of expanding customer choice; reducing system coincident peak demand; and aligning pricing structure with cost causation.²¹²

174. For the existing 3-period TOU rate, Evergy proposed two adjustments to (1) align the summer season to June 1 – September 30, and (2) reduce the non-summer price differentials to better reflect cost.²¹³ The non-summer season runs from October 1 through May 31.²¹⁴

175. The existing 3-period Evergy TOU rate has a 6-times price differential between the on-peak and super off-peak rate.²¹⁵

176. Price differentials are ratios presented to reflect the pricing relationship between the TOU periods (on-peak vs off-peak). For example, 6:1 indicates that the on-peak price is 6-times the off-peak price.²¹⁶

177. Evergy proposes three additional opt-in residential TOU rates – (1) a 2-period TOU rate; (2) a High Differential TOU rate to accommodate the charging patterns of electric vehicle (EV) drivers (High Differential EV TOU rate); and (3) a Separately Metered Electric Vehicle TOU rate which is identical to the High Differential TOU rate with the exception that customers need to have a separate meter for EVs.²¹⁷

178. The Evergy 2-period TOU proposal has a 4-times price differential between on-peak and super off-peak during summer and a 2-times differential between on-peak

²¹² Ex. 82, Winslow Direct, p. 7; and Ex. 128, Winslow Direct, p. 7.

²¹³ Ex. 82, Winslow Direct, p. 18; and Ex. 128, Winslow Direct, p. 18.

²¹⁴ Ex. 49, Lutz Direct, Schedule BDL-3, p. 70 of 89; Ex. 117, Lutz Direct, Schedule BDL-3, p. 70 of 89.

²¹⁵ Ex. 82, Winslow Direct, p. 17; and Ex. 128, Winslow Direct, p. 17.

²¹⁶ Ex. 83, Winslow Rebuttal, p. 2.

²¹⁷ Ex. 82, Winslow Direct, pp. 15-16; and Ex. 128, Winslow Direct, pp. 15-16.

and off-peak during winter.²¹⁸ This is a new rate proposal that would provide customers who have less ability to shift usage throughout the year an additional TOU rate option and mitigate the bill impact of the 3-period TOU rate typically occurring for space heating customers.²¹⁹

179. The Evergy High Differential TOU rate and the Separately Metered Electric Vehicle TOU rate would both have a 12-times price differential for EMM and a 10-times price differential for EMW.²²⁰

180. Under the proposed Separately Metered Electric Vehicle TOU rate, the customer is required to install a separate meter for EV charging while providing the customer the option to choose a different rate in Evergy's portfolio for its other home usage.²²¹

181. Evergy sees the fundamental purposes of TOU rates to be price signaling of actual costs, and creation of elasticity in demand to improve efficiency of resources.²²²

182. Staff did not support Evergy's proposed opt-in TOU rates because Staff viewed Evergy's TOU rates as not being cost-based.²²³ However, Staff stated that Evergy's 2-period TOU rate structure is the less objectionable of the residential TOU rates proposed by Evergy.²²⁴

183. Staff recommended the transition of EMM and EMW residential rate schedules to a default time-based rate structure consistent with two other Missouri

²¹⁸ Ex. 82, Winslow Direct, p. 18; Ex. 128, Winslow Direct, p. 18; Ex. 49, Lutz Direct, Schedule BDL-3, pp. 66-67, 70-71 of 89; Ex. 117, Lutz Direct, Schedule BDL-3, pp. 66-67, 70-71 of 89.

²¹⁹ Ex. 82, Winslow Direct, p. 16; and Ex. 128, Winslow Direct, p. 16.

²²⁰ Ex. 82, Winslow Direct, p. 19; and Ex. 128, Winslow Direct, p. 19.

²²¹ Ex. 82, Winslow Direct, p. 16; and Ex. 128, Winslow Direct, p. 16.

²²² Ex. 83, Winslow Rebuttal, p. 3.

²²³ Tr. Vol. 11, p. 747.

²²⁴ Ex. 243, Sarah Lange Rebuttal, p. 52.

utilities. The Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) default TOU approach is a modest on-peak overlay included in the default residential rate design. The Empire District Electric Company d/b/a Liberty (Empire) default TOU approach employs a modest off-peak discount overlay and was also included in the default residential rate design.²²⁵

184. Staff's recommended TOU default rate during the summer is a one cent premium during on peak times, and an off-peak discount of one cent during off peak time. During non-summer months, the TOU is a one-quarter of one cent (\$0.0025) premium during on-peak times, with the one cent off-peak discount remaining the same.²²⁶

185. Under Staff's recommended TOU rate, if a customer who uses approximately 1,000 kWh a month consumes a lot of their energy over night, they can expect to see their monthly bills go down by about \$10 each month. If a customer who uses around 1,000 kWh a month consumes a lot of their energy in the afternoon and early evening, they can expect to see their bills go up by about \$10 each month. If a customer is able to change when they use energy, they can save about \$20 per month. But under Staff's plan, no customer will have a TOU-related bill increase of more than one cent per kWh in the summer, or one cent for each 4 kWh the rest of the year, and even that increase will only apply if that customer uses all of their energy between 4:00 p.m. and 8:00 p.m.²²⁷

-

²²⁵ Ex. 229, Sarah Lange Direct, p. 17.

²²⁶ Tr. Vol. 11, p. 746; Ex.265, Sarah Lange Surrebuttal, p. 34.

²²⁷ Ex. 229, Sarah Lange Direct, p. 45.

- 186. Staff witness Sarah Lange argues that Staff's proposed TOU rates are a customer friendly approach, which will mitigate the impact of TOU rates to customers with energy-intensive HVAC units.²²⁸
- 187. Among investor-owned electric utilities in Missouri, TOU rates have been a recent addition and are not widespread.²²⁹
- 188. Even though opt-in TOU rate deployment is more common, some utilities have deployed TOU on an opt-out or mandatory basis, most of which were deployed in the last two years.²³⁰
- 189. States and commissions have adopted different approaches regarding opt-in versus opt-out TOU rates.²³¹
- 190. Customer satisfaction under TOU remains high with either opt-in or opt-out. However, opt-out rates have higher enrollment rates relative to opt-in rates.²³²
- 191. The cost to provide energy to customers varies with the time of day due to demand, that is, competition for that energy. The driver of Staff's low differential TOU rate proposal is that energy generally costs more in certain time periods, and that historically ratemaking has not sufficiently recognized the cost-based difference of a kWh consumed at 6:00 p.m. versus being consumed at 2:00 a.m.²³³

²²⁸ Ex. 229, Sarah Lange Direct, p. 41.

²²⁹ Ex. 83, Winslow Rebuttal, p. 6.

²³⁰ Ex. 49, Lutz Direct, Schedule BDL-3, pp. 36-37 of 89; Ex. 117, Lutz Direct, Schedule BDL-3, pp. 36-37 of 89

²³¹ Ex. 49, Lutz Direct, Schedule BDL-3, pp. 36-37 of 89; Ex. 117, Lutz Direct, Schedule BDL-3, pp. 36-37 of 89.

²³² Ex. 49, Lutz Direct, Schedule BDL-3, pp. 36-37 of 89; Ex. 117, Lutz Direct, Schedule BDL-3, pp. 36-37 of 89.

²³³ Ex. 229, Sarah Lange Direct, pp. 18-19.

- 192. Moving customer usage from on-peak to off-peak is beneficial, but was not the driving design criteria of Staff's TOU proposal.²³⁴
- 193. Third-party reviews show half of TOU rate price differentials are at least 10 cents per kWh. Staff's recommended low differential TOU rate of one cent per kWh is an outlier in the industry.²³⁵
- 194. Analysis of TOU programs show that as the price differential increases, customers shift usage in greater amounts.²³⁶
- 195. TOU rate designs are not well suited for customers with loads that cannot be shifted.²³⁷
- 196. Customers who do not save money at the level they expect under a TOU rate did not remain in the program.²³⁸
- 197. Among investor-owned electric utilities in Missouri, the price differentials are conservative Ameren Missouri's introductory rate was described as a low differential, and Empire began offering a two-cent differential in October of 2022.²³⁹
- 198. One of the primary benefits of AMI meters is the ability to price electricity closet to the true cost of service through TOU rates.²⁴⁰
- 199. Evergy witness Miller recommends Evergy's summer inclining block rate with no further change for the default residential rate structure.²⁴¹

²³⁴ Tr. Vol. 11, pp. 781-782.

²³⁵ Ex. 83, Winslow Rebuttal, pp. 4-5.

²³⁶ Ex. 83, Winslow Rebuttal, p. 5.

²³⁷ Ex. 49, Lutz Direct, Schedule BDL-3, p. 38 of 89; Ex. 117, Lutz Direct, Schedule BDL-3, p. 38 of 89.

²³⁸ Ex. 229, Sarah Lange Direct, p. 41.

²³⁹ Ex. 83, Winslow Rebuttal, p. 6.

²⁴⁰ Ex. 306 - EMW, Marke Direct, p. 16; Ex. 306 - EMM, Marke Direct, p. 10.

²⁴¹ Ex. 61, Miller Surrebuttal, p. 29.

200. Staff witness Sarah Lange recommends that Evergy's summer inclining block rare should be the default residential rate for customers who opt-out of Staff's proposed default TOU rates.²⁴²

201. Evergy recommends several changes to the residential class rate design to "clean-up" the residential tariff.²⁴³ The rates to be eliminated were previously frozen.²⁴⁴ These changes include the elimination of specific rates and transitioning those customers to existing rates.²⁴⁵

202. Staff agreed that duplicative rate codes should be eliminated, as most are the legacy of prior mergers and rate schedule consolidation that have become obsolete.²⁴⁶

203. To date, Evergy has completed more than 13 studies on TOU.²⁴⁷

204. Evergy has arguably had eight years to prep their customers for the value proposition of TOU rates since beginning installation of AMI meters.²⁴⁸

205. Given the customer education provisions of the 2018 stipulation,²⁴⁹ EMM has spent \$1,386,936 and EMW has spent \$1,692,041 on TOU program costs, and EMM has spent \$98,788 on customer education costs related to TOU and EMW has spent \$24,000. Therefore, Evergy's customers at large should be well-educated on both the

²⁴² Ex. 229, Sarah Lange Direct, pp.51-52.

²⁴³ Ex. 59, Miller Direct, p. 3; and Ex. 119, Miller Direct, p.3.

²⁴⁴ Ex. 59, Miller Direct, pp. 12-17; and Ex. 119, Miller Direct, pp.12-17.

²⁴⁵ Ex. 59, Miller Direct, p. 3; and Ex. 119, Miller Direct, p.3.

²⁴⁶ Staff Initial Brief, p. 34.

²⁴⁷ Ex. 306 - EMW, Marke Direct, p. 7; Ex. 306 - EMM, Marke Direct, p. 7.

²⁴⁸ Ex. 307, Marke Rebuttal, p. 14.

²⁴⁹ "Non-Unanimous Partial Stipulation and Agreement Concerning Rate Design Issues" issued on September 25, 2018 in cases ER-2018-0146 and ER-2018-0145.

general economic underpinning and the potential bill impacts of rates that vary with the time of day at which energy is consumed.²⁵⁰

- 206. One of the benefits of AMI meters is the ability to offer TOU rates.²⁵¹
- 207. Residential customers currently have access to multiple non-TOU rates, such as Residential General Use, Residential General Use and Space Heater; and Residential Other Use.²⁵²
- 208. The price differential ratio is the single biggest factor affecting a customer's realized behavioral change.²⁵³
- 209. Staff proposed a residential customer charge for both EMM and EMW of \$12.00. Staff calculated that amount by increasing the current EMM residential customer charge by the percentage adjustment of the EMM residential class revenue requirement, rounded to the nearest guarter.²⁵⁴
- 210. Evergy proposed a residential customer charge of \$16.00 for both EMM and EMW.²⁵⁵
- 211. The residential classes will receive above-system-average rate increases.²⁵⁶
- 212. Raising the residential customer charge diminishes the customer incentive to be more energy efficient.²⁵⁷

²⁵⁰ Ex. 229, Sarah Lange Direct pp. 15-16.

²⁵¹ Ex. 23, Caisley Surrebuttal, p. 17.

²⁵² Ex. 229, Sarah Lange Direct pp. 8-9.

²⁵³ Tr. Vol. 11, pp. 719-720.

²⁵⁴ Ex. 265, Sarah Lange Surrebuttal, pp. 30-31.

²⁵⁵ Ex. 59, Miller Direct, p. 43; and Ex. 119, Miller Direct, p.34.

²⁵⁶ Ex. 265, Sarah Lange Surrebuttal, p. 32.

²⁵⁷ Tr. Vol. 10, p. 619.

213. Evergy proposed a \$3.25 customer charge for customers with a second meter.²⁵⁸

214. Staff's calculation indicated the customer charge for a second meter is \$4.11. Therefore, Staff proposed the customer charge for a second meter should be in the range of \$4.25 to \$5.00.²⁵⁹

215. Evergy's current and proposed residential TOU rates cannot be used by net metering customers due to statutory provisions that have not been updated to reflect dynamic rates.²⁶⁰

216. Staff's proposed low differential TOU rate, which is an adder to the existing residential general use rate, can be used by net metering customers with no need for legislative or tariff changes.²⁶¹

217. Evergy, in the Stipulation and Agreement filed on August 30, 2022, (Revenue Requirement Stipulation) committed to developing a report that examines the technical, billing, and legal barriers to offering further TOU rate options to residential customer-generators with net-metering or interconnection agreements.²⁶²

218. The Revenue Requirement Stipulation was approved by the Commission on September 22, 2022.²⁶³

219. Evergy witness Kimberly Winslow estimated that for each customer enrolling in one of its opt-in TOU programs it would take approximately \$150 per in marketing and education costs, \$150 in customer acquisition cost.²⁶⁴ The only basis to

²⁵⁸ Ex. 243, Sarah Lange Rebuttal, p. 50.

²⁵⁹ Ex. 243, Sarah Lange Rebuttal, p. 50.

²⁶⁰ Ex. 49, Lutz Direct, Schedule BDL-3, p. 43 of 89; Ex. 117, Lutz Direct, Schedule BDL-3, p. 43 of 89.

²⁶¹ Tr. Vol. 11, pp. 689-690.

²⁶² Revenue Requirement Stipulation, para. 7(e).

²⁶³ Order Approving Four Partial Stipulations and Agreements, issued September 22, 2022.

²⁶⁴ Ex. 82, Winslow Direct, p. 54; and Ex. 128, Winslow Direct, p. 54.

support the \$150 customer acquisition estimate is a statement that it is based on Evergy's experience. If Evergy's opt-in TOU rates are approved, it asks that it be authorized to recover prudently incurred program costs at a not-to-exceed acquisition cost of \$150 per customer.²⁶⁵

- 220. Providing optional programs that lose \$150 per participant, to be spread out to other ratepayers, is unreasonable.²⁶⁶
- 221. Evergy proposed changes for non-residential customers' rate schedules, design and structure (1) a new time-related pricing rate; (2) seasonal alignment (changing EMM to match EMW); (3) consolidation of rates/codes; and (4) elimination of select end use rates.²⁶⁷
 - 222. Evergy proposed the elimination of the Residential Other Use rate.²⁶⁸
- 223. Staff proposed a default TOU rate for non-residential customers using the same price differentials as proposed for the residential customers.²⁶⁹
- 224. Evergy witness Miller argues that Staff's non-residential TOU proposal does not consider the broad set of customers and the unique rate structures that exist across iurisdictions.²⁷⁰
- 225. Evergy has not had discussions with its commercial and industrial customers regarding the possibility of mandatory TOU rates.²⁷¹

²⁶⁵ Ex. 82, Winslow Direct, p. 54; and Ex. 128, Winslow Direct, p. 54.

²⁶⁶ Ex. 243, Sarah Lange Rebuttal, pp. 2-3.

²⁶⁷ Ex. 59, Miller Direct, pp. 45-47; and Ex. 119, Miller Direct, pp. 34-39.

²⁶⁸ Ex. 58, Miller Direct, pp. 45-47; and Ex. 118, Miller Direct, pp.34-39.

²⁶⁹ Ex. 229, Sarah Lange Direct, p. 60.

²⁷⁰ Ex. 61, Miller Surrebuttal, p. 30.

²⁷¹ Tr. Vol. 11, p. 711.

226. MECG opposed Staff's proposed default TOU rates for the large power service (LPS) and large general service (LGS) rates.²⁷² MECG's opposition is due to the lack of a rate to evaluate and a lack of information regarding an impact analysis of the proposed changes to the LPS and LGS customer classes.²⁷³

227. Generally, for the commercial and industrial classes, Evergy proposed to apply 125% of each class increase to the fixed cost rate components (i.e. customer charges and demand charges) and 75% to the variable cost rate components (i.e. energy charges).²⁷⁴

228. The Revenue Requirement Stipulation states that EMW's Large Power Service voltage differential for pricing of energy blocks will be re-implemented.²⁷⁵

229. MECG supports Evergy's proposed rate design for commercial and industrial customers.²⁷⁶

230. Both OPC and MECG propose that Evergy should meet with stakeholders related to its rate modernization plan within 180 days after the effective date of rates in this case.²⁷⁷

231. Evergy meets with stakeholders on a periodic basis and is not opposed to discussing the rate modernization plan with interested parties.²⁷⁸

232. In the Revenue Requirement Stipulation, the signatories agreed to true-up revenues and billing determinants with the residential class's revenues by season

²⁷² Ex. 405, Maini Rebuttal, p. 4; Ex. 406, Maini Rebuttal, p.4.

²⁷³ Ex. 405, Maini Rebuttal, p. 12; Ex. 406, Maini Rebuttal, pp. 13-14.

²⁷⁴ Ex. 59, Miller Direct, pp. 43-44; and Ex. 119, Miller Direct, p. 35.

²⁷⁵ Revenue Requirement Stipulation, p. 12.

²⁷⁶ Ex. 403, Maini Direct, p. 34; Ex. 404, Maini Direct, p. 34.

²⁷⁷ OPC Position Statement p. 30 and MECG Position Statement p. 16.

²⁷⁸ Evergy Position Statement p. 36.

provided.²⁷⁹ The Revenue Requirement Stipulation provides that Evergy's proposed Seasonal Alignment with no impact on revenues will be adopted, consistent with the true-up billing determinants.²⁸⁰

Conclusions of Law:

CC. In undertaking the balancing of interests required by the Constitution, the Commission is not bound to apply any particular formula or combination of formulas. Instead, the Supreme Court has said:

Agencies to whom this legislative power has been delegated are free, within the ambit of their statutory authority, to make the pragmatic adjustments which may be called for by particular circumstances.²⁸¹

Issues Presented by the Parties:

- B.²⁸² What are the appropriate rate schedules, rate structures, and rate designs for the non-residential customers of each company?
- D. What are the appropriate rate schedules, rate structures, and rate designs for the Residential customers of each utility?
 - 1. What is the appropriate residential customer charge?
- E. What measures are appropriate to facilitate implementation of the appropriate default or mandatory rate structure, rate design, and tariff language for each rate schedule?
- F. Should the Company's proposed Time of Use rate schedules be implemented on an opt-in basis?
- G. Should the Staff's proposed Time of Use rate schedules be implemented on a mandatory basis?
- K. Should the Commission order Evergy to meet with stakeholders related to its rate modernization plan within 180 days after the effective date of rates in this case?

²⁷⁹ Revenue Requirement Stipulation, para. 3; see also Exhibit 2, billing determinants, attached to the Revenue Requirement Stipulation and marked confidential.

²⁸⁰ Revenue Requirement Stipulation, para. 7(a).

²⁸¹ Federal Power Comm'n v. Natural Gas Pipeline Co., 315 U.S. 575, 586 (1942).

²⁸² The original lettering is retained here – the missing letters correspond to resolved issues.

L. Should Evergy work to improve the education of its customers regarding the billing options and rate plans it has currently?

Decision:

Residential Rates, Schedules and Structures; Opt-In Versus Opt-Out; High Price Differential Versus Low Price Differential; and Customer Education

Several of the parties to this case are supportive of TOU rates in general. The disagreements form around opt-in versus opt-out and a high price differential versus a lower price differential. The Commission sees a benefit in incorporating a mix of these approaches.

Evergy proposes four opt-in TOU rates for residential customers, which reflect higher differentials than Staff's lower TOU rate proposal. A high differential allows higher levels of savings for those customers who are able to change their energy usage times. Evergy's opt-in approach is based on the recommendation to provide its customers with the option of selecting the rates that work for them. Under this approach, Evergy's base default rates would be the standard flat rates. One of the primary benefits of AMI is the ability to provide customers with TOU rates. Given eight years of experience with AMI, millions of dollars invested in AMI across Evergy's footprint and many studies regarding TOU rates, the Commission is concerned with taking the status quo approach that currently reflects only minimal (1.1%) residential adoption of TOU rates.

Staff's recommendation included a low differential opt-out TOU rate in the form of an approximately two-cent swing between on- and off-peak pricing. Staff's proposal uses a low differential rate to offer more protection for the customers that cannot change usage times. The basis for Staff's low differential proposal is that it is the "training wheels" approach for introducing TOU rates to customers that currently are not and have never

been enrolled in Evergy's TOU pilot. The Commission finds Staff's approach of implementing TOU rates as a default or opt-out rate is a better approach to introduce residential customer to TOU rates, since opt-out TOU rates result in higher enrollment. However, Staff's low differential rate, even though it would provide protections to some customers, does not provide sufficient incentive or opportunities for customers to see savings from TOU rates. Therefore, the Commission does not agree with Staff's low differential TOU rate being the introductory default TOU rate for residential customers.

Offering both high and low differential TOU rates will allow for more customer choice, will sufficiently introduce TOU rates to customers and will allow a higher differential rate to exhibit the benefits that derive from TOU rates. But the Commission also understands that allowing the option to opt-into a lower differential rate may better suit certain customers' lifestyles. As both Evergy's and Staff's proposals have multiple benefits, the Commission will authorize modified versions of both. The Commission finds Evergy's 2-period TOU rate, with a 4-times price differential between on-peak and super off-peak during summer and a 2-times differential between on-peak and off-peak during winter, to be the best introductory high differential TOU rate for residential customers as it has the lowest differential of Evergy's high differential TOU rates while still providing a benefit to those customers seeking substantial savings by altering the time of day of their energy consumption. Therefore, the Commission will order that Evergy's 2-period TOU rate be established as the default residential customer rate with Staff's low differential TOU rate as an opt-in TOU rate.

Given the high differential in the 2-period TOU rate and Evergy's customer surveys showing hesitancy regarding TOU rates, this 2-period high differential rate should take effect beginning on October 1, 2023, to correspond to the start of non-summer TOU

season. This will allow more time for customer education prior to implementation and have the transition occur when the rate differential is lower. Additionally, the transition to TOU default rates shall be phased-in between October 1, 2023 and December 31, 2023. The phase-in shall occur by appropriate groupings of customers on the appropriate customer's billing cycle such that the TOU implementation for all Evergy customers shall be completed by December 31, 2023.

To assist Evergy with developing customer education and outreach regarding TOU rates, the Commission will convene a workshop to that effect under a separate File Number. As no expense amounts are included in the rates approved in this case for customer education and outreach costs associated with the implementation of mandatory and optional TOU rates, the Commission will also authorize the tracking of these costs for consideration and possible recovery in Evergy's next rate case. Evergy will be directed to submit quarterly reports detailing the types and amounts of any education and outreach expenses deferred.

Evergy's additional proposed TOU rates (3-period TOU rate; the High Differential EV TOU rate; and the Separately Metered Electric Vehicle TOU rate) will further advance customer choice. The Commission finds these additional proposed TOU rates reasonable and will also approve them as opt-in rates. Residential customers who are not currently on a TOU rate plan, will be assigned to the 2-period TOU rate automatically, and may opt-in to either Staff's low differential, Evergy's 3-period, High Differential EV rate or Separately Metered EV rate. Existing 3-period TOU customers shall stay on their existing 3-period TOU rate during and after the transition of non-TOU residential customers to the 2-period TOU rate unless those customers request to opt-in to the 2-period TOU rate or any other available residential TOU rate.

The Commission is not approving any traditional ratemaking structure for residential customers to be used after December 31, 2023, when the transition to TOU default rates is completed, with the exception of those residential customers without AMI meters. Since TOU rates are only available to customers with AMI meters, the Residential General Use rate (without space heating) will remain available for any customers without AMI meters.

The Commission recognizes that Evergy's TOU rates do not currently work for net metering customers due to the limitation of the current legislation. The parties agree that Staff's low differential rate can be used for net metering customers. As a result, Staff's low differential TOU rate shall be the default rate for net metering customers when Evergy's 2-period TOU rate is established as the default residential customer rate for the non-net metering customers.

Evergy has proposed the elimination of several residential rate codes, which were either previously frozen or are duplicative with other existing rate codes. Staff agrees with the removal of duplicative rate codes. Therefore, the Commission will order the elimination of the rate codes identified in this case. However, to avoid customer rate codes being switched multiple times in a short period, the elimination of the rate codes shall be delayed until the relevant customers are switched to a TOU rate. The rate code elimination, therefore, will begin October 1, 2023, and be phased-in in conjunction with those customers' transfer to the 2-period TOU rates; with rate code elimination ending no later than December 31, 2023.

On September 22, 2022, the Commission approved the Revenue Requirement Stipulation, which included revenue requirements, true-up revenues and billing determinants agreed to by the signatories. Therefore, the Commission finds that

inter-season design of residential rates shall be based on the determinants and seasonal revenue agreed to by the signatories to that stipulation. The revenue requirement used shall not exceed the revenue requirement specified in the Revenue Requirement Stipulation.

To summarize, residential rates for Evergy are authorized to be Evergy's 2-period TOU proposed rate as the default rate beginning October 1, 2023. Staff's low differential rate is approved as an opt-in rate, without a lead-in time. Evergy's additional residential TOU proposals are also authorized on an opt-in basis, without a lead-in time. Customers are authorized to opt-out of the default high differential rate into one of the four additional TOU rates approved here. Existing 3-period TOU customers shall stay on their existing 3-period TOU rate during and after the transition of non-TOU residential customers to the 2-period TOU rate unless those customers request to switch to the 2-period TOU rate or an alternative opt-in TOU rate. Evergy shall implement a program to engage and educate customers in the approximate ten-month lead-in time until its 2-period TOU rate takes effect as the default rate for residential customers beginning October 1, 2023. Evergy shall work with Staff and OPC and permit them a chance to review materials related to the education program and to the implementation of TOU rates from October 1 through December 31, 2023, to ensure the program and implementation have a maximum potential for success. Further Evergy will eliminate the identified residential rate codes and transition customers to the identified existing codes on or after October 1, 2023, as they transition to the 2-period TOU rate.

Net Customer Acquisition Cost

Evergy proposed that the Commission authorize deferral for prudently incurred program costs, such as marketing, education, and administration, for its proposed

residential TOU rates at a net customer acquisition cost of no more than \$150 per customer. No other party was in favor of the net customer acquisition cost. There is no evidence in the record to suggest how the \$150 was computed or to explain the need for a net customer acquisition cost. Furthermore, the Commission finds that if TOU rates are implemented on an opt-out basis instead of an opt-in basis as proposed by Evergy, there should be no acquisition process. The Commission is not persuaded that it is "more likely than not" that the proposed \$150 net customer acquisition cost would be just and reasonable.

Residential Customer Charge

The Commission agrees with Staff's recommendation regarding the appropriate residential customer charge. As Evergy begins offering multiple TOU rates, it is important to foster customer interest, with one of the proven ways being to allow customers to impact their monthly electric bill. It is likely that significantly raising the residential customer charge will mute the TOU pricing signals such that interest or follow-through with TOU rates will wane as they cannot achieve their expected savings from TOU mitigation due to a higher customer charge. Ratemaking decisions are often interdependent, and the Commission's decision here is based on moving forward with TOU rates and authorizing a smaller increase than Evergy requested to the customer charge in order to foster the growth of the TOU rates. The Commission will re-evaluate the growth of the TOU programs and the monthly customer charge in Evergy's next rate case. In the present case, the Commission finds that \$12.00 is the appropriate residential customer charge for all single-metered residential customers. Given that one of the optin TOU rates approved by the Commission requires a second meter, the Commission finds it appropriate to have a separate customer charge requirement for residential customers with a second meter. Therefore, all residential customers with a second meter shall be charged a customer charge of \$3.25 for the second meter.

Non-residential Rates, Schedules and Structures

Given the unique make-up of non-residential customers, including small business, such as gas stations and restaurants, whose power consumption is customer driven, the Commission does not find Staff's proposed default TOU rate for non-residential customers appropriate without further study. The Commission agrees with Evergy's proposal for non-residential rates, schedules and structure, which MECG supported. Evergy proposed a new Time-Related Pricing rate, seasonal alignment matching EMM to EMW, code consolidation and elimination of select end use rates. The Commission is persuaded that the expansion of rate offerings while simplifying the codes and end use rates will improve customer satisfaction, efficiency and will result in just and reasonable rates to non-residential customers.

Meeting with Stakeholders

The parties also presented the question of Evergy being ordered to meet with stakeholders related to its rate modernization plan. Evergy stated it meets with stakeholders on a periodic basis and is not opposed to discussing the rate modernization plan with interested parties. Therefore, the Commission memorializes here that this meeting shall occur.

RATE BASE and RESOURCE PLANNING

The Commission is combining the two issues involving coal-fired generation.

Findings of Fact:

233. Generally, Sierra Club faulted Evergy for using the results of its Depreciation Study to set unit retirement dates for its coal fleet. Sierra Club suggested

instead an optimized capacity expansion model, which would allow the model to select retirement dates.²⁸³

234. Sierra Club stated that Evergy performed no optimized economic analyses on the projected performance of its coal fleet for its 2021 IRP.

235. Capacity expansion software is a tool that simply compares going-forward costs of the available alternatives and determine the lowest-cost option to meet capacity and energy requirements, subject to any modeling constraints (e.g., import limitations or annual build limits).²⁸⁴

236. As part of the joint resolution following the 2021 IRP, Evergy is utilizing capacity expansion modeling beginning with the 2022 Annual Update.²⁸⁵

237. Sierra Club asserted that Evergy has not demonstrated that continued investment in its coal fleet is the prudent and least-cost option to provide reliable power to ratepayers as part of these dockets or as part of its 2021 IRP.²⁸⁶

238. Sierra Club alleged that Evergy could retire one or even two of its existing coal units and would not need to replace the capacity for at least another decade.²⁸⁷

239. EMM has generation in excess of its customers' needs; while EMW does not have enough SPP accredited generation capacity to meet its peak. Combined, the two have enough SPP accredited generation to meet the combined loads.²⁸⁸

240. Having enough capacity is essential to having enough energy to meet customers' load requirements. However, having enough capacity does not necessarily ensure that energy will be available when it is needed. For instance, EMW does not have

²⁸³ Ex. 450, Glick Direct, pp. 17-18.

²⁸⁴ Ex. 56, Messamore Rebuttal, p. 13.

²⁸⁵ Ex. 56, Messamore Rebuttal, p. 13.

²⁸⁶ Ex. 450, Glick Direct, p. 4.

²⁸⁷ Ex. 450, Glick Direct, p. 21.

²⁸⁸ Ex. 302, Mantle Rebuttal p.4.

enough generation capacity through its owned resources and purchased power agreements to meet the SPP resource adequacy standards. It can only meet the SPP resource adequacy standards when combined with EMM. EMW's resource plan depends on EMM to provide capacity and on SPP to provide energy.²⁸⁹

241. EMM's generation produces revenue on the SPP energy market that offsets fuel costs and some of its load costs. The revenues produced by EMW's generation covers the fuel cost but does not offset much of its load costs. EMW relies on the market to provide the electricity needed by its customers.²⁹⁰

242. In the simplest terms, capacity is the maximum output an electricity generator can physically produce, measured in megawatts. Energy is the amount of electricity a generator produces over a defined period of time. For example, a generator with a capacity of 100 MW that runs at full capacity for 10 hours generates 1,000 MWh (100 MW * 10 hours = 1,000 MWh) of energy.²⁹¹

243. During Winter Storm Uri, EMW incurred more than \$315 million in fuel and purchased power expenses. In File No. EF-2022-0155, EMW requested to recover more than \$300 million of those costs from its customer through securitization.²⁹²

244. The Commission's approach to IRPs involves the comparison of a variety of resource plans (including different combinations of retirements and demand-side/supply-side additions) to assess which is the lowest cost, and allows for the assessment of the value of incremental changes to the resource plan. The IRP process and the capacity expansion model have the same goal.²⁹³

²⁸⁹ Ex. 302, Mantle Rebuttal p. 10.

²⁹⁰ Ex. 302, Mantle Rebuttal, p. 5.

²⁹¹ Ex. 302, Mantle Rebuttal, pp. 9-10.

²⁹² Ex. 302, Mantle, Rebuttal, p. 7, 17.

²⁹³ Ex. 56, Messamore Rebuttal, p. 13.

245. When determining the acquisition, continuation, or retirement of any resource, the availability of fuel and the dispatchability of the resource, along with meeting environmental regulations needs to be considered. No one type of resource on its own can meet all of the requirements of a prudent resource plan; however, a diverse portfolio of resources will.²⁹⁴

246. Sierra Club's testimony did not mention generation types or discuss any base load alternatives in its discussion of the retirement of current base load units.²⁹⁵ Sierra Club's analysis did not account for Evergy's need to have sufficient capacity and meet reserve margin requirements.²⁹⁶

247. Base load generating units/plants are electric power sources that operate continuously to meet minimum levels of power demand on a 24/7 basis. Base load plants are usually large scale and are key components of an efficient and reliable electric grid. Base load plants are not designed to respond to peak demands or emergencies. Examples of base load units include coal and nuclear power plants.²⁹⁷

248. Intermediate power plants/units are used during the transition between base load and peak load demand. These plants are not as difficult to ramp up as base load plants or as expensive to operate as peak load plants. Wind and solar and some natural gas power plants fall in the intermediate category. Because wind and solar resources are intermittent by nature, and the electricity they generate fluctuates with the weather and the time of day, they cannot be depended on to meet peak demand or to provide energy on a consistent basis for base load purposes.²⁹⁸

²⁹⁴ Ex. 302, Mantle Rebuttal, p. 14.

²⁹⁵ Ex. 241, Hull Rebuttal, p. 6.

²⁹⁶ Ex. 56, Messamore Rebuttal, pp. 11-12.

²⁹⁷ Ex. 241, Hull Rebuttal, p. 4.

²⁹⁸ Ex. 241, Hull Rebuttal, pp. 4-5.

249. A peaking power plant (commonly referred to as a "Peaker plant") is one that can switch on when additional power is needed, which will come online without much delay, and will start generating power on a moments' notice. Once a peak has passed, they are returned to standby mode for future peaks. Peaker plants are often used much less frequently over the course of a year than base and intermediate plants.²⁹⁹

250. A dispatchable resource provides electricity when the electricity is needed. Fossil fuel units are units that can be relied on to generate electricity when needed, *i.e.* dispatched, when fuel is available. When it is not needed to generate electricity, the plant does not generate. Renewable generation is not completely dispatchable.³⁰⁰

251. A good resource portfolio is one that contains diverse types of generation resources, each with its own strengths and weaknesses that are chosen to meet the unique load demands of the utility's customers in all hours of the year while also minimizing the risk of high utility bills and loss of service.³⁰¹

252. OPC disagreed with Sierra Club's recommendation to begin a process of retiring Evergy's coal plants.³⁰²

253. Sierra Club recommended a disallowance for EMM pertaining to capital costs and O&M for La Cygne Units 1 and 2 and latan 1 on the basis that EMM has not demonstrated the prudence of continuing to operate the plant relative to retirement and replacement with alternatives.³⁰³

²⁹⁹ Ex. 241, Hull Rebuttal, p. 5.

³⁰⁰ Ex. 302, Mantle Rebuttal, p. 13.

³⁰¹ Ex. 302, Mantle Rebuttal, p. 14.

³⁰² Tr. Vol. 8, p. 272.

³⁰³ Ex. 450, Glick Direct, p. 4; and Ex. 451, Glick Direct, p. 4 (Confidential version).

254. Sierra Club recommended a disallowance for EMW pertaining to capital costs and O&M for Jeffrey Units 1-3 and its share of latan Unit 1 on the basis that EMW has not demonstrated the prudence of continuing to operate the plant as compared to retirement and replacement with alternatives.³⁰⁴

255. La Cygne is a two-unit, coal-fired power plant near La Cygne, Kansas. Unit 1 is 873 megawatts (MW), and Unit 2 is 685 MW, for a combined nameplate capacity of 1,558 MW. Unit 1 came online in 1973, and Unit 2 came online in 1977. EMM owns 50% of both units, and Evergy Kansas owns the other 50%. In the preferred plan of EMM's 2021 IRP, Unit 1 is set to retire in 2032, and Unit 2 is set to retire in 2039.

256. Iatan is a two-unit, coal-fired plant near Weston, MO. Unit 1 is 726 MW and Unit 2 is 999 MW, for a combined nameplate capacity of 1,725 MW. Unit 1 came online in 1980, Unit 2 came online in 2010. EMM owns 61% of the plant and EMW owns 18%. The remainder is owned by non-affiliated entities. In the preferred plan of Evergy MO's 2021 IRP, Iatan Unit 1 is slated to retire in 2039 and Iatan Unit 2 is slated to retire in 2070.

257. Jeffrey is a three-unit, coal-fired plant located in Emmet Township in Pottawatomie County, Kansas. Each of the three units has a nameplate capacity of 740 MW, for a total capacity of 2,220 MW. EMW owns 8% (175 MW) of the Jeffrey plant, and Evergy Kansas owns the other 92%. Unit 1 came online in 1978, Unit 2 in 1980, and Unit 3 in 1983. Jeffrey Units 1 and 2 are set to retire in 2039, and Unit 3 is set to retire in 2030.³⁰⁷

³⁰⁴ Ex. 450, Glick Direct, p. 5; and Ex. 451, Glick Direct, p. 5 (Confidential version).

³⁰⁵ Ex. 450, Glick Direct, p. 8.

³⁰⁶ Ex. 450, Glick Direct, p. 7.

³⁰⁷ Ex. 450, Glick Direct, p. 7.

258. Generally, Sierra Club's concern was that continuing operations of coal plants could lead to large capital expenditures caused by future environmental regulations, and that such investment could then influence the continued use of the plant.³⁰⁸

259. Sierra Club asserted that the continued operation of all but two of Evergy's coal plants is potentially imprudent and thus all O&M and capital costs incurred at those facilities during the test year should be disallowed because of its dissatisfaction with Evergy's IRP process.³⁰⁹

260. EMW, as an 8% minority owner in the Jeffrey Energy Center, would not control a retirement decision.³¹⁰

261. Sierra Club calculated that each of the plants incurred costs in excess of the value of its energy and capacity over the past five years, with the exception of 2021 (referring to Winter Storm Uri³¹¹).³¹² However, Sierra Club's calculation did not reflect how expenses are passed on to ratepayers.³¹³

262. Sierra Club concluded from its analyses that the historical net revenues for the period 2017 to 2020 were significantly higher when the full capital expense amount was allocated to the year it was incurred when compared to when the capital expenses were amortized.³¹⁴

263. Utilities typically amortize capital expenditures (based on the utility's cost of capital) and spread the costs out over the remaining economic life of the plant.³¹⁵

³⁰⁸ Ex. 450, Glick Direct, p. 13.

³⁰⁹ Ex. 56, Messamore Rebuttal, p. 13.

³¹⁰ Ex. 56, Messamore Rebuttal, p. 8.

³¹¹ Ex. 450, Glick Direct, pp. 23-24; and Ex. 451, Glick Direct, pp. 23-24 (Confidential version).

³¹² Ex. 450, Glick Direct, pp. 21-22; and Ex. 451, Glick Direct, pp. 21-22 (Confidential version).

³¹³ Ex. 450, Glick Direct, pp. 32-33; and Ex. 451, Glick Direct, pp. 32-33 (Confidential version).

³¹⁴ Ex. 450, Glick Direct, p. 27 and 35; and Ex. 451, Glick Direct p. 27 and 35 (Confidential version).

³¹⁵ Ex. 450, Glick Direct, p. 33

264. Evergy argued that Sierra Club's analyses simply compare costs to market values of energy, ancillary services, and capacity, and assert that if costs are greater than total revenues, the continued operation of the plant must be imprudent. This type of analysis does not consider that Evergy needs to have sufficient economic capacity to serve customers and meet reserve margin requirements. ³¹⁶

265. Sierra Club's claim that almost 1,700 MW of capacity (over 4,300 MW if the capacity of those units which EMW and EMM do not own is included) should be retired on the basis of costs exceeding revenues and not including any assessment of costs for replacement capacity is not prudent.³¹⁷

266. A prudent electric utility analysis of retiring a generating plant should include an assessment of the cost to replace its capacity.³¹⁸

Conclusions of Law:

No additional Conclusions of Law are necessary.

Issues Presented by the Parties:

Resource Planning

A. Has EMW been imprudent in its resource planning process?

- 1. If yes, how should EMW's fuel and purchased power costs be determined?
- 2. If yes, how should EMW's FAC base factor be calculated?
- 3. If yes, how should EMW's accumulation period actual costs be adjusted for its FAC?

B. Should the Commission require Evergy to conduct a full retirement study of its coal fleet using optimized capacity expansion software, which identifies the optimal retirement date for each of its coal-fired units?

³¹⁶ Ex. 56, Messamore, pp. 11-12.

³¹⁷ Ex. 56, Messamore, pp. 11-12.

³¹⁸ Tr. Vol. 8, p. 272.

Rate Base

Has Evergy met its burden of proof to permit recovery from ratepayers of capital and O&M costs proposed in the test year for latan Unit 1, Jeffrey Units 1-3, and La Cygne Units 1 and 2?

Decision:

Resource Planning

Sierra Club has suggested a finding of imprudence regarding the resource planning involved with coal-fired generating plant. Sierra Club proposes that coal plants should be retired more quickly than already planned. Staff, OPC and Evergy all disagree with Sierra Club's position for different reasons. Sierra Club's analysis over-simplifies the analysis required to make these decisions. Sierra Club's proposal does not account for the replacement of the capacity of the retired power plant; type of replacement capacity (baseload/dispatchable capacity) and its implications; and stranded costs of the retired plant. The standard to begin a prudency analysis is the raising of a serious doubt. The Commission finds that Sierra Club has not raised a serious doubt about Evergy's resource planning. The Commission does not find the reason for Sierra Club's request for a full retirement study of Evergy's coal units using optimized capacity expansion software persuasive, especially given that Evergy is already utilizing this tool.

Rate Base

Sierra Club's recommendation to disallow the costs of certain coal plants has overlooked two key factors in the retirement of utility generation. Sierra Club's analysis did not adequately address undepreciated investment and also fails to address the fact that these coal plants are not solely Evergy's to control and determine a retirement date. The standard to pursue a finding of imprudence is to raise a serious doubt about the

practice at issue. The Commission does not find that Sierra Club has raised a serious doubt regarding the prudence of Evergy's resource planning and therefore its spending on capital and O&M costs for latan Unit 1, Jeffrey Units 1-3, and La Cygne Units 1 and 2. The Commission finds that Evergy has met its burden of proof to permit recovery of capital and O&M costs proposed in the test year for latan Unit 1, Jeffrey Unites 1-3, and La Cygne Units 1 and 2.

STREETLIGHTING (EMW ONLY)

Findings of Fact:

267. The City of St. Joseph (St. Joseph) recommends revisions to Tariff Sheet No. 150 to permit a municipality to build streetlights as part of a public works project, or to have them built by a contractor as part of a city-approved development, and deem ownership of the streetlights to be in Evergy.³¹⁹

268. The proposal of transferring ownership of streetlighting was offered by St. Joseph Light and Power Company (SJLP) as part of its municipal street lighting tariff.³²⁰

269. Historically, St. Joseph was able to require a developer build the streetlights and then have the utility take ownership of the streetlights (Developer Installed Option). Evergy's current practice charges the streetlighting fees directly to St. Joseph.³²¹

270. St. Joseph was the only EMW customer to have the Developer Installed Option to the municipal streetlighting tariff.³²²

³¹⁹ Ex. 51, Lutz Rebuttal, p. 9.

³²⁰ Ex. 51, Lutz Rebuttal, p. 10.

³²³ Ex. 307, Marke Rebuttal, p. 23.

³²² Ex. 51, Lutz Rebuttal, p. 12.

271. To Evergy's best knowledge, the practice of allowing developer installed streetlighting in St. Joseph began through a memorandum of understanding that followed SJLP's purchase of the St. Joseph streetlighting system in the 1980s or early 1990s.³²³

272. Subsequently, SJLP and another electric utility, Missouri Public Service Company, merged under Aquila and then KCP&L Greater Missouri Operations Company, and in 2016 consolidated the various companies' streetlighting tariffs in File No. ER-2016-0156.³²⁴

273. The City of St. Joseph was a party to File No. ER-2016-0156.³²⁵

274. Provisions for the Developer Installed Option were not included in the 2016 consolidated streetlighting tariffs as the consolidation sought to end lighting options that were not suited for universal application across the service area.³²⁶

275. In a limited deployment, such as the city limits of St. Joseph with approximately 45 square miles, the Developer Installed Option was practical in that utility companies could travel to inspect a streetlight quickly and utility relationships with the small number of developers allowed some familiarity and interaction with the developers' streetlight installers to assist quality control.³²⁷

276. Beginning in 2017, Evergy began a systematic conversion of its municipal street lighting to light emitting diode (LED) technology.³²⁸

277. In spring of 2018, St. Joseph lifted a 12-year suspension on city-initiated streetlight expansion.³²⁹

³²³ Ex. 51, Lutz Rebuttal, p. 10.

³²⁴ Ex. 51, Lutz Rebuttal, p. 10.

³²⁵ Order Granting Intervention, issued March 21, 2016, File No. ER-2016-0156.

³²⁶ Ex. 51, Lutz Rebuttal, pp. 10-11.

³²⁷ Ex. 52, Lutz Surrebuttal, p. 33.

³²⁸ Ex. 117, Lutz Direct, p. 52.

³²⁹ Ex. 51, Lutz Rebuttal, p. 11.

278. Also in spring of 2018, EMW completed a conversion of all non-decorative streetlighting fixtures to LED technology.³³⁰

279. St Joseph has approximately 6,500 LED lighting type streetlights, plus a few older light types such as high pressure sodium or mercury vapor.³³¹

280. As a rule of thumb, and subject to change due to location and other conditions, it costs Evergy roughly \$3,800 to purchase and install a metal street light pole.³³²

281. The LED conversion and the lifting of the 12-year suspension brought to attention the change in EMW's streetlighting tariff, which resulted in multiple meetings between Evergy and St. Joseph, resulting in a letter sent to St. Joseph in December of 2018.³³³

282. In 2019 St. Joseph attempted to invoke the terms of the Developer Installed Option contained in the pre-2016 streetlighting tariff, which had provided for transferring ownership of streetlighting to Evergy, which resulted in additional meetings and a letter sent to St. Joseph in April 2020.³³⁴

283. The letter sent in April 2020 presented two alternatives to St. Joseph: 1) let Evergy build all the new streetlights; or 2) St. Joseph build the new streetlights itself and also own and maintain them.³³⁵

³³⁰ Ex. 51, Lutz Rebuttal, p. 11.

³³¹ Tr. Vol. pp. 881-882.

³³² Tr. Vol. 12, p. 872; and pp. 880-881.

³³³ Ex. 51, Lutz Rebuttal, p. 11.

³³⁴ Ex. 51, Lutz Rebuttal, pp. 11-12.

³³⁵ Ex. 850, Carter Direct, p. 3; Ex. 854 is a copy of the April 2020 letter.

284. A maintenance only rate in Tariff Sheet No. 151 attempts to remove the equipment ownership aspects and provide only maintenance and energy cost elements.³³⁶

285. Tariff Sheet No. 150.1 describes the additional optional charges applicable only to streetlights owned by EMW to recover the costs associated with the installation of the elements listed in 4.1 to 4.5 of the tariff sheet.³³⁷

286. City owned streetlights would not be subject to the charges in Tariff Sheet No. 150.³³⁸

287. St. Joseph can install and own streetlights, but that would require adding liability insurance and maintenance costs to the city budget.³³⁹

288. Breakaway bases are special bases for streetlight poles designed to fragment if hit by a vehicle. It is used as the base for a metal light pole.³⁴⁰

289. Undergrounding refers to how the electricity is extended to the light pole, by installing the electric distribution line underground rather than by overhead wire. Depending on soil conditions around the new streetlight, rock may need to be removed or other specialized trenching or boring be employed to extend electricity to the streetlight pole underground.³⁴¹

290. The purpose of charges for underground conductors and breakaway bases is to cover the ongoing maintenance of these items; the costs are not accounted for elsewhere in the streetlighting tariff.³⁴²

³³⁶ Tr. Vol. 12, p. 884.

³³⁷ Tr. Vol. 12, pp. 886-887.

³³⁸ Tr. Vol. 12, pp. 886-887.

³³⁹ Ex. 850, Carter Direct, pp. 3-4.

³⁴⁰ Ex. 851, Carter Surrebuttal, pp. 6-7.

³⁴¹ Ex. 851, Carter Surrebuttal, p. 7.

³⁴² Ex. 51, Lutz Rebuttal, p. 12.

291. Where the streetlighting tariff refers to charges added for new, basic installations, it does not mean a new streetlight, rather it establishes the conditions of new installation versus a retrofit. The designation of new does not limit EMW's charges to installation only, it is an ongoing monthly charge for continued maintenance.³⁴³

292. In order to re-adopt the Developer Installed Option, EMW would need to be prepared to support all municipalities wishing to utilize the option.³⁴⁴

293. St. Joseph testified that the ability to require developers to install streetlighting at the developer's cost is a policy decision that should be left to local municipalities, but that it would be content with some other designated limitation to reduce the availability of the tariff to just itself or a small group.³⁴⁵

294. St. Joseph argues that the capital costs of streetlights should be borne by the developers who are causing the expansion, and not the city operating budget.³⁴⁶

295. St. Joseph distinguishes the capital costs of the city versus the operating costs.³⁴⁷ It is this change in the city's budget – paying for the streetlights from its capital costs to its operating costs that is the cause of St. Joseph's concern.³⁴⁸

296. St. Joseph argues that the change to the streetlighting tariff removed the city's ability to allocate capital expense to developers, and instead burdened the city with significant infrastructure cost.³⁴⁹

³⁴³ Tr. Vol. 12, pp. 871-872.

³⁴⁴ Ex. 51, Lutz Rebuttal, p. 12.

³⁴⁵ Ex. 851, Carter Surrebuttal, pp. 3-4.

³⁴⁶ Ex. 850, Carter Direct, p. 4.

³⁴⁷ Ex. 851, Carter Surrebuttal, p. 4.

³⁴⁸ Ex. 851, Carter Surrebuttal, pp. 4-5.

³⁴⁹ Ex. 851, Carter Surrebuttal, p. 2.

297. St. Joseph argued that it is unfair for it to have to pay ongoing monthly charges related to undergrounding, breakaway bases, rock removal, or other specialized trenching/boring.³⁵⁰

298. Sixty-one streetlights have been identified as being transferred from St. Joseph to EMW in 2017.³⁵¹

299. Of the 61 identified streetlights, 31 have breakaway bases.³⁵²

300. All 61 identified streetlights require undergrounding. 353

301. The 61 streetlights are in EMW's rate base valued at zero dollars.³⁵⁴

Conclusions of Law:

DD. Streetlighting Tariff Sheet No. 151 contains no restriction on third parties' ability to install streetlights.

EE. Section 393.130.3 prohibits an electrical corporation from granting undue or unreasonable preference to select ratepayers and locales.

Issues Presented by the Parties:

A. Should language be added to EMW's Municipal Street Lighting Service Tariff providing that streetlights installed by a city contractor or a city-approved developer shall be deemed to be owned by Evergy, after inspection and approval by the Company, and shall not be subject to additional installation or structure charges?

B. Should language be added to EMW's Municipal Street Lighting Service Tariff providing that no "Optional Equipment" charges in Section 4.0 or 5.0 of Municipal Street Lighting Service Tariff will be charged to streetlight facilities which are deemed to be owned by the Company and installed by a city or its contractor, or by a developer of a city-approved development?

³⁵⁰ Ex. 850, Carter Direct, pp. 6-7.

³⁵¹ Ex. 850, Carter Direct, p. 7.

³⁵² Tr. Vol. 12, p. 867.

³⁵³ Tr. Vol. 12, p. 867.

³⁵⁴ Tr. Vol. 12, p. 873.

C. Should the Company be required to remove from its rate base streetlights that were installed by city contractors or city-approved developers?

D. Should the Company be required not to charge the City of St. Joseph for breakaway bases, undergrounding and other "Optional Equipment" charges under Sections 4.0 and 5.0 of the tariff for streetlights that were installed by city contractors or city-approved developers?

Decision:

The Commission is sympathetic to the position of St. Joseph. It had a program whereby the city accumulated street lights, but did not have to pay to purchase and install them as they were paid for by the developer. Under the previous tariff of transferring ownership of streetlighting, the city streetlights also received ongoing maintenance at no cost to the city.

Such a program, however, is not suited for universal application across the EMW service area. The Developer Installed Option provisions of the streetlighting tariff began with a memorandum of understanding between EMW's predecessor and St. Joseph when St. Joseph Light and Power was acquired by Aquila. It is from this arrangement that the original tariff provisions were created. No other city ever participated in the Developer Installed Option.

When the streetlighting tariffs were consolidated in File No. ER-2016-0156, the Developer Installed Option was removed as it was not suited for universal application across the service territory. In arguing for the revival of Developer Installed Option, St. Joseph argued that it would accept verbiage which limited the program's availability within the service territory. In essence, St. Joseph requested that the Commission order EMW to offer the Developer Installed Option to everyone, or just to St. Joseph.

By statute, tariffs are required to be non-discriminatory. St. Joseph first requests that the Developer Installed Option would be available to everyone. This argument fails

due to the cost and involvement of offering such a streetlight ownership transfer program across the service territory. EMW's response in sum is that transferring ownership and maintenance of approximately 6,500 streetlights in a city of 45 square miles is achievable, but only due to the relatively small area. If the Developer Installed Option would be reinstated and available to all customers; the costs, personnel needed, and lack of current compliance standards makes enactment of the tariff provisions unreasonable.

St. Joseph argued that the Developer Installed Option could be limited to certain city or county classifications, or geographic identifiers. St. Joseph did not offer any evidence that there was a difference in the provision of street lighting service for St. Joseph's streetlights or in the provision of service of cities of a certain size or within a county of a certain designation as compared to other customers taking service under the streetlighting tariff such that the preference could be justified. The Developer Installed Option, as recommended by St. Joseph, is not appropriate due to the high cost associated with offering it across EMW's service area. Additionally, there is no evidence to support a finding that limiting the availability of the streetlight transfer of ownership provisions to only St. Joseph or other similarly situated cities would be justified.

St. Joseph also recommended that the streetlights it has already transferred ownership of be removed from EMW's rate base. EMW credibly testified that the transferred streetlights were in rate base for the purpose of tracking, but that all transferred streetlights were entered at a valuation of zero dollars. The Commission does not find St. Joseph's recommendation reasonable as the tracking is useful, and EMW is not earning a return on the transferred streetlights.

Lastly, St. Joseph recommended that it be exempted from having to pay for the continuing maintenance of the streetlights it transferred, specifically mentioning the

undergrounding and breakaway bases. This recommendation fails for the reason that the charges it opposes are tied to the ongoing maintenance of the streetlights. Even though transferred by St. Joseph to EMW, St. Joseph must still pay the monthly charges for EMW-owned streetlights under the terms of the tariff. Those monthly charges include energy and, pertinent to this subissue, maintenance. If St. Joseph desires to pay EMW only for energy and not for maintenance, then Tariff Sheet No. 151 details the energy charges for streetlights not owned or maintained by EMW. However, streetlights not owned or maintained by Evergy will be the responsibility of the streetlight owners, which is the situation that St. Joseph finds objectionable. The Commission does not find reasonable the recommendation of St. Joseph to be exempt from certain streetlighting charges addressing ongoing maintenance due to a prior transfer of ownership of the streetlights.

CENTRAL NEBRASKA PUBLIC POWER AND IRRIGATION DISTRICT HYDRO PURCHASED POWER AGREEMENT

Findings of Fact:

302. EMM entered into a hydro purchased power agreement with Central Nebraska Public Power and Irrigation District ("the Hydro PPA") to meet the Kansas Renewable Energy Standard.³⁵⁵

303. The Company's response to a discovery request in File No. ER-2018-0145 provides a power point presentation that provides information related to its justification for entering into the Hydro PPA contract.³⁵⁶

356 Ex. 336, Surrebuttal Testimony of Lena Mantle in ER-2018-0145, Schedule LMM-S-4C.

³⁵⁵ Ex. 302, Mantle Rebuttal, p. 25; Tr. Vol 13, pp. 945-946.

- 304. The Hydro PPA contract is effective from January 1, 2014, through December 31, 2023.³⁵⁷
- 305. The Hydro PPA contract has been serving customers in both Missouri and Kansas 358
- 306. Since the effective dates of rates from File No. ER-2018-0145, EMW alleges that the Hydro PPA has been included in base energy rates but has been excluded from the ongoing FAC Fuel Adjustment Rate ("FAR") filings.³⁵⁹
- 307. The Hydro PPA cannot be used to meet the Missouri Renewable Energy Standard because the three plants are accredited at 18 MW each and the Missouri statute requires plants to be rated at 10 MW or less to qualify for inclusion in meeting the Missouri Renewable Energy Standard.³⁶⁰
- 308. The Hydro PPA's capacity is not needed for EMM to meet resource adequacy requirements of SPP.³⁶¹
- 309. The Hydro PPA's energy is not needed to meet customer load in Missouri.³⁶²
- 310. Staff argues that there is no benefit to Missouri customers just by being served; if the costs are exceeding the revenues, there is no benefit.³⁶³
- 311. OPC testified that there are no benefits to Missouri customers based on the Hydro PPA.³⁶⁴

³⁵⁷ Tr. Vol. 13, p. 951.

³⁵⁸ Tr. Vol. 13, pp. 954-955.

³⁵⁹ Ex. 66, Nunn Surrebuttal, p. 7.

³⁶⁰ Ex. 303, Mantle Surrebuttal, p. 6; *see also* Tr. Vol. 13, p. 986, stating the generators are noncompliant with the Missouri limit.

³⁶¹ Ex. 303, Mantle Surrebuttal, p. 6.

³⁶² Tr. Vol. 13, p. 961, and pp. 986-987.

³⁶³ Tr. Vol. 13, p. 960.

³⁶⁴ Tr. Vol. 13, pp. 986-987.

312. Staff argues that there should be no recovery for the energy used to serve Missouri customers, and that Evergy can choose to serve Missouri customers without the Hydro PPA.³⁶⁵

313. Staff witness Shawn Lange, P.E., modeled EMM's generation and load requirements, and determined that, as modeled by Staff, EMM's generation exceeds its total load from Kansas and Missouri by approximately 6 million MWh annually.³⁶⁶

314. The Hydro PPA was modeled by Staff at providing 300,000 MWh annually.³⁶⁷

315. The modeled costs for the Hydro PPA were in excess of the revenues that were modeled.³⁶⁸

316. OPC testified to reviewing the test-year time period, and found that the costs of the Hydro PPA exceeded revenues for every month of the test-year period.³⁶⁹

317. There are instances where EMM would not be able to dispatch all 21 million MWh and would need to purchase power from SPP to meet its system load.³⁷⁰

318. EMM's generation is dispatched by the SPP.³⁷¹

Conclusions of Law:

FF. The United States Supreme Court has stated:

The filed rate doctrine also precludes a regulated utility from collecting any rates other than those properly filed with the appropriate regulatory agency. This aspect of the filed rate doctrine constitutes a rule against retroactive ratemaking or retroactive rate alteration. In its discussion of the doctrine, the [Court] explains that it explicitly prohibits an entity from "imposing a rate increase for gas already sold," and states, in a footnote, that an entity "may

³⁶⁵ Tr. Vol. 13, p. 963.

³⁶⁶ Tr. Vol. 13, pp. 974-976; Ex. 335C.

³⁶⁷ Tr. Vol. 13, p. 977.

³⁶⁸ Tr. Vol. 13, p. 983.

³⁶⁹ Tr. Vol. 13, pp. 987-988, and 990.

³⁷⁰ Tr. Vol. 13, p. 981.

³⁷¹ Tr. Vol. 13, p. 982.

not impose a retroactive rate alteration and, in particular, may not order reparations.³⁷²

Issues Presented by the Parties:

How should the net cost of the Central Nebraska Public Power and Irrigation District ("CNPPID") hydro purchased power agreement ("PPA") be treated?

- 1. Should a normalized cost be included in the calculation of the fuel and purchased power costs of Evergy Metro's revenue requirement?
- 2. Should a normalized cost be included in the Evergy Metro fuel adjustment clause ("FAC") base factor calculation?
- 3. Should the actual CNPPID hydro PPA costs be included in Evergy Metro's actual accumulation period FAC costs?³⁷³

Decision:

Evergy argues that the Hydro PPA serves Missouri customers and as such is used and useful. Although used, evidence shows it is not needed to meet Missouri customer load, its costs have exceeded revenues in every month of the current rate case test year, and thus, it is not useful to Missouri customers or economic.

Evergy also argues that the Hydro PPA was included in the base energy rate in the previous rate case and that the practice should be extended in this rate case. Underlying this argument are the terms of a settlement agreement from EMM's same previous rate case, File No. ER-2018-0145. The parties have disagreed about the inclusion, or exclusion, of the Hydro PPA in the settlement, and whether the settlement only dictated exclusion of the Hydro PPA from recovery under the FAC, or excluded the Hydro PPA from recovery in the base energy rate as well. The Commission does not reach a decision on what was or was not involved in that settlement, nor is it permitted to

³⁷² State ex rel. Associated Natural Gas Co. v. Public Service Comm'n, 954 S.W.2d 520, 531 (Mo. App. W.D. 1997) (internal citations omitted).

³⁷³ Questions edited due to overlapping issues.

make adjustments even if the Hydro PPA was previously included in the base energy rate in error. The Commission's decision is based on the fact that the Hydro PPA's usefulness was not shown during the test-year. Moreover, the initial ten-year term of the Hydro PPA contract ends in December 31, 2023. The Hydro PPA does not provide benefits to Missouri customers and therefore will be excluded from recovery from Missouri customers.

Conclusion:

The Commission, having considered the competent and substantial evidence upon the whole record, makes the above findings of fact and conclusions of law. The positions and arguments of all of the parties have been considered by the Commission in making these findings. Any failure to specifically address a piece of evidence, position, or argument of any party does not indicate that the Commission did not consider relevant evidence, but indicates rather that omitted material is not dispositive of this decision.

Except as otherwise set out in the body of this order, the Commission finds that EMM and EMW have met their burden of proof to show that an increased rate for each is just and reasonable. Thus, the Commission concludes, based upon its review of the whole record that rates approved as a result of this order support the provision of safe and adequate service. The revenue requirement authorized by the Commission is no more than what is sufficient to keep EMM's and EMW's utility plant in proper repair for effective public service and provide to Evergy's investors an opportunity to earn a reasonable return upon funds invested.

By statute, orders of the Commission become effective in thirty days, unless the Commission establishes a different effective date.³⁷⁴ To allow Evergy the earliest

³⁷⁴ Section 386.490.2, RSMo.

opportunity to implement the approved rates, the Commission finds it reasonable to make this order effective in less than 30 days.

THE COMMISSION ORDERS THAT:

- 1. The tariff sheets submitted on January 7, 2022, by EMM, and assigned Tracking Nos. YE-2022-0200 and YE-2022-0201 are rejected.
- 2. EMM is authorized to file tariff sheets sufficient to recover revenues approved in compliance with this order and the *Order Approving Four Partial Stipulations* and *Agreements*, issued September 22, 2022.
- 3. The tariff sheets submitted on January 7, 2022, by EMW, and assigned Tracking No. YE-2022-0202 are rejected.
- 4. EMW is authorized to file tariff sheets sufficient to recover revenues approved in compliance with this order and the *Order Approving Four Partial Stipulations* and *Agreements*, issued September 22, 2022.
 - 5. The retirement of Sibley was prudent.
- 6. All determinations regarding the Sibley AAO are as set forth in the body of this order.
- 7. AMI-SD meters installed for the three reasons of (1) exchange of AMI meter for AMI-SD meter; (2) exchange of AMI meter for an AMI-SD meter due to customer arrears; and (3) unknown reasons are disallowed from recovery.
- 8. Fifty percent of the cost of the consultant fees associated with Subscription Pricing are disallowed from recovery.
 - 9. Residential rates for Evergy are authorized as follows:
 - a. Evergy's 2-period TOU proposed rate will be the default rate beginning October 1, 2023. The 2-period TOU rate will be phased in by

appropriate customer group from October 1, 2023, through December 31, 2023, and such phase-in shall be in coordination with the start of each customer group's billing cycle;

- b. Staff's proposed low-differential rate is approved as an opt-in rate, without a lead-in time;
- c. Evergy's additional TOU rate proposals are authorized on an opt-in basis, without a lead-in time.
- d. Staff's low differential TOU will be the default rate for the net metering customers.
- e. Evergy's Residential General Use rate will be the default rate for non-AMI metered residential customers.
- f. The customer charge for all single-meter residential customers shall be \$12.00. The customer charge for an additional residential meter shall be \$3.25.

Evergy shall eliminate the identified residential rate codes and transition customers to the identified existing codes as discussed in the body of this order. Additionally, Evergy shall implement a program to engage and educate customers in the approximately ten-month lead-in time until its tariff provisions regarding the 2-period TOU rate as the default rate for residential customers becomes effective.

- 10. Evergy is authorized to track the education and outreach costs associated with TOU rate implementation for consideration and possible recovery in a future rate case.
- 11. Evergy shall submit in this file quarterly reports detailing the types and amounts of education and outreach expenses deferred with the first report due ninety days from the effective date of this order.
- 12. The Commission will open a new File Number to establish a forum allowing collaboration among stakeholders regarding the TOU education and implementation plans approved herein.

- 13. Non-residential rates for Evergy are authorized in the form of Evergy's proposed Time-Related Pricing rate on an opt-in bases, seasonal alignment matching EMM to EMW, and code consolidation and elimination of select end use rates.
- 14. Evergy shall host a meeting with interested stakeholders related to its rate modernization plan within 180 days of the effective date of Evergy's tariffs filed in compliance with this order.
- 15. Sierra Club's allegation of imprudence regarding resource planning involving coal plants is denied for lack of raising a serious doubt as to the prudence of existing resource planning.
- 16. Sierra Club's allegation of imprudence regarding Evergy's test-year spending on capital and O&M costs for latan Unit 1, Jeffrey Units 1-3, and La Cygne Units 1 and 2 is denied for lack of raising a serious doubt as to the prudence of its test-year spending for the above listed coal-fired generation plants.
- 17. St. Joseph's request to add language to EMW's streetlight tariff related to the Developer Installed Option is denied.
- 18. St. Joseph's request that the streetlights it has already transferred ownership of be removed from EMW's rate base is denied.
- 19. St. Joseph's request that it be exempted from having to pay for the continuing maintenance of the streetlights it already transferred to EMW is denied.
- 20. The Hydro PPA is disallowed from recovery as it is not used and useful to Missouri customers.
- 21. This *Amended Report and Order* will become effective on December 18, 2022.



BY THE COMMISSION

Morris L. Woodruff Secretary

Silvey, Chm., Rupp, Coleman, and Kolkmeyer CC., concur and certify compliance with the provisions of Section 536.080, RSMo (2016). Holsman, C., dissents.

Hatcher, Senior Regulatory Law Judge