

-Exhibit No.:  
Issue: Counts 5 and 6 of Staff Complaint  
Witness: Katie R. McDonald  
Type of Exhibit: Rebuttal Testimony  
Sponsoring Party: Evergy Missouri Metro and Evergy  
Missouri West  
Case No.: EC-2024-0092  
Date Testimony Prepared: May 6, 2024

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO.: EC-2024-0092**

**REBUTTAL TESTIMONY**

**OF**

**KATIE R. MCDONALD**

**ON BEHALF OF**

**EVERGY MISSOURI METRO and  
EVERGY MISSOURI WEST**

**Kansas City, Missouri  
May 2024**

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**DIRECT TESTIMONY**

**OF**

**KATIE R. MCDONALD**

**Case No. EC-2024-0092**

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

2 A: My name is Katie R. McDonald. 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 Vice President Public 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: I lead the Public Affairs division, and have responsibility for the strategy and execution of  
16 Corporate Communications, Marketing and Advertising, Research, Digital Strategy and all  
17 digital tools (including the website, customer portals and app), and Social Impact functions.

1 **Q: Please describe your education, experience and employment history.**

2 A: I earned a journalism degree from the University of Missouri-Columbia and an MBA from  
3 the Bloch School of Management at the University of Missouri-Kansas City. I am also a  
4 graduate of the University of Idaho's Utility Executive Program. I have worked in various  
5 positions in the Public Affairs division at Evergy since I joined the company in 2007. Prior  
6 to joining KCP&L (now Evergy), I worked in marketing and public affairs roles at two  
7 integrated marketing communications agencies in Kansas City.

8 **Q: Have you previously testified in a proceeding before the Missouri Public Service**  
9 **Commission ("Commission" or "MPSC") or before any other utility regulatory**  
10 **agency?**

11 A: No.

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

13 A: The purpose of my testimony is to respond to Counts 5 and 6 of Staff's Complaint and  
14 respond to Staff's direct testimony.

1           **I.       EVERGY’S EFFORTS TO ENGAGE AND EDUCATE ITS CUSTOMERS**  
2           **REGARDING ITS TOU IMPLEMENTATION PLAN AND RESPONSE TO STAFF**

3   **Q:       Before addressing the direct testimony of Staff witness Sarah Lange, do you have any**  
4           **comments regarding the Count 5 of the Staff Complaint which alleges that Evergy**  
5           **has not complied with the Commission’s Order in the Amended Report and Order in**  
6           **Case Nos. ER-2022-0129 and ER-2022-0130 to implement a program to engage and**  
7           **educate customers in the approximately ten-month lead-in time until its tariff**  
8           **provisions regarding the 2-period TOU rate as the default rate for residential**  
9           **customers becomes effective?**

10   **A:**    Thank you for the opportunity to address Count 5 of Staff’s Complaint. It is imperative to  
11           clarify misperceptions regarding Evergy’s implementation of the education and outreach  
12           campaign that had an objective of engaging and educating customers in the lead-up to the  
13           TOU transition period. Staff makes the accusations that Evergy did not, “[I]mplement a  
14           program to engage and educate customers in the approximately ten-month lead-in  
15           time[...].” There are two parts to this complaint. First, whether Evergy implemented a  
16           campaign within the allotted ten-month lead-in time, and second, whether customers were  
17           engaged and educated. Staff fails to present evidence to either and, actually, gives  
18           supporting details that Evergy indeed did both items. I plan to address both of these issues,  
19           among others, throughout my testimony.

20                   First, it’s crucial to emphasize that the Commission Order on default TOU rates did  
21           not stipulate an immediate start of customer education precisely ten months before the  
22           transition to TOU rates, which would have been only a few weeks after the Commission  
23           issued their *Amended Report and Order*. Second, the Commission Order also did not  
24           require Evergy to be done educating customers after ten months. Rather, the Order

1 mandated the initiation of educational efforts within the ten-month window leading up to  
2 the implementation of the new default rate and other TOU options. Evergy diligently met  
3 this directive.

4 As outlined in our *Motion for Reconsideration* in case ER-2022-0129, we quickly  
5 sought additional time so that we could carefully craft an educational campaign, facilitate  
6 stakeholder input, wait to transition customers until after summer peak season, and equip  
7 customers with essential rate comparison tools. The Commission's subsequent actions in  
8 their *Amended Report and Order* in case ER-2022-0129 included the postponement of the  
9 TOU implementation until Fall 2023 as requested by Evergy. I believe this amended Order  
10 validated the prudence of our approach and timeline.

11 In addition, the fact that the Commission ordered a workshop in the *Amended*  
12 *Report and Order* in case ER-2022-0129, indicated that the Commission did not expect the  
13 customer education to take place immediately, as Staff's Complaint suggests, but only after  
14 hosting a workshop to gather input from stakeholders. We believe that starting the  
15 education campaign much earlier, before there was time to host a workshop and gain  
16 stakeholder input, build out and launch important customer education tools, train customer  
17 service representatives, develop messaging and informational materials, would have been  
18 inappropriate and would have gone against the Commission's request for stakeholder  
19 involvement.

20 Staff tries to make the argument that the customer education campaign should have  
21 started right after the *Amended Report and Order* but *also* suggests that Evergy did not  
22 take the time to consider their feedback before building the campaign. These are  
23 contradictory statements. Evergy took the latter approach and spent time developing a

1 campaign and hosted stakeholder feedback workshops, as requested by the Commission,  
2 and still began the customer education and outreach campaign in June 2023, which was  
3 seven months before the required date to have all customers moved to TOU.

4 Secondly, Staff's assertion that Evergy neglected to engage and educate customers  
5 is unfounded. Contrary to their claims, the evidence indicates robust customer engagement  
6 and continued growing education. Our internal research, supplemented by studies  
7 conducted by TrueNorth, underscores widespread awareness and understanding of the  
8 TOU transition among customers. More than 90 percent of customers surveyed by Evergy  
9 said they were aware of the transition to TOU rates and more than 70 percent indicated  
10 they remembered seeing Evergy's communication on the topic. More than 30 percent of  
11 customers ended up selecting their rate plan before being transitioned and close to 350,000  
12 customers used the TOU Rate Comparison Tool. These numbers clearly show customer  
13 engagement and education on the topic that resulted in the action we set out to achieve.  
14 Awareness of the transition to TOU rates surpassed our goals for the campaign.

15 In addition, customers showed understanding of TOU rate features. When asked if  
16 customers know the main features of TOU rates, such as they will pay more for electricity  
17 during peak hours and less during off-peak hours, more than 60 percent customers were  
18 able to correctly understand TOU rate features. In fact, more than 40 percent of surveyed  
19 customers expressed satisfaction with their level of knowledge on TOU rates and indicated  
20 they need no further information on the topic. Whether the engagement was positive,  
21 neutral, or negative, this undeniably signified active involvement. Given these indicators,  
22 it is perplexing that Staff would insinuate that Evergy fell short of its obligations to engage  
23 and educate customers regarding the TOU transition.

1           Also, it is essential to address the premature nature of Staff's accusations, which  
2           were issued before the campaign had concluded. Staff's Complaint, which suggested that  
3           Eversource's materials were misleading, references that Staff planned to request the  
4           educational materials for review at a later date, only after they filed the Complaint. Staff  
5           hadn't reviewed the materials before filing this complaint. In addition, Staff's reliance on  
6           baseline data fails to account for the significant strides made in customer awareness and  
7           comprehension following the campaign's implementation. By selectively omitting  
8           campaign research findings and failing to review all education materials before making the  
9           Complaint, Staff's Complaint creates a false narrative regarding Eversource's commitment to  
10          customer education, which is also unhelpful in creating a collaborative environment as  
11          requested by the Commission.

12           Eversource remains steadfast in its commitment to transparent communication and  
13          proactive customer engagement. We trust that a thorough examination of the evidence will  
14          affirm the efficacy of our educational efforts and dispel any unfounded and unhelpful  
15          allegations put forth by Staff. In addition, Commissioner comments at Agenda meetings  
16          and at the Eversource on-the-record presentations regarding TOU help to demonstrate that  
17          Staff's allegations are without merit. See Schedule KRM-1.

18   **Q: Please explain the efforts of Eversource to engage and educate its customers regarding**  
19   **the TOU Implementation Program.**

20   A: Eversource developed a comprehensive, multi-faceted surround-sound outreach and education  
21   campaign, strategically designed to engage customers. The campaign included multiple  
22   touchpoints, communication tactics and channels, and bilingual messaging in both English  
23   and Spanish. In addition, Eversource conducted in-depth qualitative and quantitative marketing



1 research to help understand customers' reactions to the new TOU rate plans, which TOU  
2 messages are the most impactful, tested rate plan names, and conducted a thorough billing  
3 impact analysis to pinpoint segments most affected by the transition. We developed a  
4 campaign that would reach all Evergy customers while also prioritizing engagement efforts  
5 for special customer groups including seniors, income-eligible individuals, households  
6 relying on electric heating, and those less digitally inclined. In addition, we engaged a third-  
7 party research firm to conduct quarterly surveys to help us understand awareness and  
8 understanding of the rates before and during the campaign. Additionally, a monthly survey  
9 was launched to assess marketing campaign performance. We shared the results of this  
10 work with Staff and OPC throughout the months leading up to and during the campaign,  
11 making adjustments and changes based on their feedback. Examples of these changes will  
12 be addressed later in my testimony.

13 At the time of Staff's initial Complaint filing, Evergy had just begun Phase 2 of our  
14 five-phase education campaign. This campaign featured multiple ways in which we  
15 engaged and educated customers and is one of the most comprehensive customer  
16 campaigns in Evergy's history. Please refer to Schedule KRM-2 for a breakdown of the  
17 campaign phases, along with our engagement tactics and education messaging, and  
18 Schedule KRM-3 for a list of the engagement and education tactics by audience groups.  
19 Below is a list of some of the engagement and education tactics Evergy utilized in the  
20 campaign:

- 21 ■ **Customer Outreach Events:** Evergy conducted more than 70 individual  
22 outreach events, primarily targeting income-eligible and senior customers,  
23 across the first three phases of the campaign. These events included both  
24 those hosted by Evergy and those organized in collaboration with partner  
25 agencies such as Raytown Christian Church and North Kansas City YMCA,  
26 as well as numerous neighborhood associations and senior apartment

1 complexes. Evergy also ensured representation at events with  
2 predominantly Spanish-speaking audiences by deploying Spanish-speaking  
3 employees and actively engaging with Spanish-speaking communities.

- 4 ▪ **Food Pantries and Library Handout Distribution:** Evergy partnered with  
5 food pantries and libraries throughout our service area to conduct outreach  
6 events and distribute informational materials. More than 25 food pantry  
7 locations received TOU handout materials to be included in food boxes, and  
8 nearly 40 library locations were provided informational materials to share  
9 with customers.

- 10 ▪ **Earned Media and Media Relations:** Evergy leveraged news media  
11 channels to enhance awareness and understanding of the transition to TOU  
12 rates. News reports disseminated detailed information about the TOU plans,  
13 options available, and where customers could access further assistance and  
14 information.

- 15 ▪ **Direct Mail:** To ensure non-digital customers were engaged and educated,  
16 Evergy sent multiple direct mails to customer homes. Many of these mailers  
17 provided more detailed information on the change to TOU and rate plans.

- 18 ▪ **Email:** Evergy used email to not only inform customers about their rate  
19 options, but also as a tool to direct them to the Rate Comparison Tool and  
20 to provide customers with detailed plan information once they had selected  
21 their rate plan.

- 22 ▪ **Bill Messages and Inserts:** Monthly bill inserts and messages were utilized  
23 from June through December to progressively move customers from  
24 awareness of the rate change to plan selection, offering savings tips and  
25 detailed plan information.

- 26 ▪ **Videos:** Evergy created 10 different videos to help support the campaign,  
27 including an overview video, 4 videos for each rate plan, two informational  
28 training videos (one in English and one in Spanish) and 3 videos for digital  
29 ads to explain how TOU works. These videos were used on our website, in  
30 paid digital ads, at outreach events and to help train agency partners on  
31 TOU.

- 32 ▪ **Website:** Evergy used evergy.com to provide detailed information about  
33 why Evergy was moving to TOU rates, details on each rate plan, and tips to  
34 help customers save money on TOU. In addition, the website hosted our  
35 Rate Comparison Tool and Change My Rate tool to provide personalized  
36 information for each customer.

- 37 ▪ **Rate Comparison Tool:** This tool, crucial for helping customers  
38 understand the bill impacts of new TOU plans, provided a breakdown of  
39 expected costs based on past billing data, and resulted in a significant  
40 increase in customer engagement throughout the campaign.

- 1           ▪       **Mobile App:** Evergy integrated TOU rate plan information into the Evergy  
2 app, enabling customers to access plan details, use the Rate Comparison  
3 Tool, and sign up for new rates directly through the app.
  
- 4           ▪       **Paid Search:** The Company used paid search to make it easier for  
5 customers who were searching for TOU information to find our TOU  
6 landing page and rate information pages.
  
- 7           ▪       **Radio and Streaming Audio:** As one of the Phase 1 awareness tactics,  
8 Evergy used both traditional and streaming audio to encourage customers  
9 to go to evergy.com to learn more about the new rate plans and pick a rate  
10 by October.
  
- 11          ▪       **Newspaper Ads and Church Bulletins:** To reach non-digital and rural  
12 audiences, Evergy utilized advertisements in local newspapers and church  
13 bulletins, recognized as important information sources in rural areas.
  
- 14          ▪       **Billboards and In-Store Advertising:** To help gain broad awareness of the  
15 change to TOU rates, Evergy used both billboards and in-store  
16 advertisements, like grocery stores, to gain customer awareness and direct  
17 them to evergy.com for more information.
  
- 18          ▪       **Rate Education Reports:** Evergy mailed customers a Rate Education  
19 Report and sent a version by email. These reports provided customers a  
20 personalized look at what each plan might cost based on the customer's own  
21 past usage history. The reports also provided TOU educational savings tips.
  
- 22          ▪       **Welcome Kit:** A comprehensive welcome kit, including information about  
23 peak and off-peak times, savings tips, and an informational refrigerator  
24 magnet, was mailed to all customers to aid in understanding and saving on  
25 their TOU plan.
  
- 26          ▪       **Partner Trainings:** Evergy conducted multiple training sessions with  
27 agency partners, particularly those serving the income-eligible audience,  
28 enabling them to provide informed guidance to their clients regarding rate  
29 options and mechanics.
  
- 30          ▪       **Handout/Flyer:** Evergy developed flyers that were used at community  
31 events, packed in food pantry boxes, available at local libraries, and mailed  
32 to customers upon request.
  
- 33          ▪       **Connect Center:** Evergy used our in-person walk-in center to provide  
34 customers a place to ask additional questions about their TOU rate options.  
35 Evergy dedicated a customer service agent to work a special TOU table at  
36 the Connect center to provide education on TOU to customers who may  
37 have stopped by for other issues.

- 1           ▪       **Contact Center:** While all Evergy Customer Service Representatives  
2           (CSRs) were trained to address TOU questions, a dedicated TOU phone  
3           number and team of CSRs specially trained in TOU inquiries were  
4           established, providing direct access to in-depth assistance for customers.

5           As you can see from the list of tactics, Evergy used both awareness tactics, direct  
6           tactics, and personalized tactics to fully engage and educate customers. Had Staff fully  
7           reviewed these materials and the full survey results before developing their Complaint,  
8           they would have seen how Evergy’s surround-sound approach worked to fully engage and  
9           educate customers, which the customer research shows was successful. Evergy has  
10          submitted examples of these items in our monthly (now quarterly) TOU reports filed in  
11          case: EW-2023-0199.

12 **Q: Did Evergy file its implementation plans and give updates for the Commission, Staff,**  
13 **OPC, and other interested parties?**

14 **A:** Yes, Evergy upheld our commitments regarding our TOU implementation plans by  
15 submitting them to the Commission, Staff, OPC, and other relevant parties. This  
16 transparency was exemplified through multiple presentations, discussions, and follow-up  
17 data requests concerning our plans.

18           In addition, Evergy proactively included the details of our proposed  
19 implementation timeline within our initial filing in the TOU Workshop case EW-2023-  
20 0199 in January 2023. Additionally, we made several filings of our plans, facilitated two  
21 stakeholder workshops, conducted three Commission presentations, shared a monthly  
22 packet of materials, and diligently responded to numerous requests for information from  
23 Staff and OPC. These actions underscore our dedication to ensuring clarity and openness  
24 throughout the implementation process.

25           As shared in Case EW-2023-0199:

- 1           ▪       Status Report – 1/17/2023
- 2           ▪       **Stakeholder Workshop 1 – 3/28/2023**
- 3           ▪       Notice of Workshop Presentation – 3/29/2023
- 4           ▪       Reply to Staff Responses and Questions – 4/24/23
- 5           ▪       Response to OPC Questions Regarding the Planning of Time of Use
- 6           ▪       Campaign – 4/26/23
- 7           ▪       Response to Staff’s Concerns, Feedback and Request for Additional
- 8           ▪       Information- 4/26/23
- 9           ▪       **Stakeholder Workshop 2 – 5/23/2023**
- 10          ▪       Notice of Workshop Presentation – 5/25/23
- 11          ▪       Evergy’s Reply to Staff Response to May 23, 2023
- 12          ▪       Presentation and Request for Additional Information – 6/23/23
- 13          ▪       Reply to Staff’s Request of Additional Information – 7/28/2023
- 14          ▪       Evergy Response to Staff’s Request of Additional Information – 8/1/2023
- 15          ▪       **Presentation to the Commission regarding Evergy’s TOU Education**
- 16          ▪       **Plan – 8/10/23**
- 17          ▪       Reply to OPC Comments, and Response to Other Prior Filings – 8/9/2023
- 18          ▪       Notice of Filing Agenda Presentation – 8/11/2023
- 19          •       August Monthly TOU Transiting Reporting – 9/8/2023
- 20          ▪       September Monthly TOU Transition Reporting – 10/10/2023
- 21          ▪       November Monthly TOU Transitional Reporting – 11/9/2023
- 22          ▪       **On-the-record Commission Presentation – 11/28/2023**
- 23          ▪       December Monthly TOU Transitional Reporting – 12/11/2023
- 24          ▪       **Stakeholder Workshop 3 – 12/18/2023**
- 25          ▪       January Monthly TOU Transitional Reporting – 1/10/2024
- 26          ▪       Response to Staff Request for Additional Data – 1/19/2024

- 1           ▪       On-the-record Commission Presentation – 1/22/2024
- 2           ▪       February Monthly TOU Transitional Reporting – 2/9/2023

3 **Q: Did Evergy participate in workshops with the Commission, Staff, OPC and other**  
4 **interested parties prior to implementing its TOU rates?**

5 A: As previously mentioned, Evergy conducted three workshops with stakeholders, held on  
6 March 28, 2023, May 23, 2023, and December 18, 2023. The workshop objectives and  
7 suggested workshop agenda topics were outlined in our Status Report on January 17, 2023.  
8 Additionally, the workshop presentations were shared with parties in advance of the  
9 meetings. For the first workshop, Evergy proposed sharing updates on planning activities,  
10 discussing best practices learned from other utilities regarding TOU implementations, and  
11 soliciting ideas from Staff and OPC for the education campaign. Additionally, we  
12 suggested holding a second workshop in May to present the fully developed education and  
13 outreach plan. This timeline was carefully crafted to ensure that we could incorporate  
14 feedback from Staff and OPC before finalizing the outreach plan.

15           Notably, Staff did not express any concerns with this approach, the proposed  
16 workshop topics, or the timeline prior to the first workshop, nor did they respond to our  
17 Status Report.

18           It's important to address Ms. Lange's direct testimony (p. 34, l. 19), which asserts  
19 that Evergy did not inform Staff of our timeline until March 28, 2023. This claim is  
20 inaccurate, as our Status Report on January 17, 2023, clearly indicates that Evergy intended  
21 to start the implementation of a Customer Education Plan after the proposed May 2023  
22 workshop. Again, Staff did not respond to this Status Report, proposed timeline or  
23 suggested agenda.

24           The January 17, 2023, Status Report (p. 3) stated:

1 7) The Company’s implementation plan for the mandatory TOU and  
2 optional rates is focused on customer education and understanding,  
3 implementation of digital tools and system enhancements, and  
4 development of effective processes that will yield customers’  
5 smooth transition to new rates.

6 9) Evergy believes it is important to seek input from Staff (“Staff”)  
7 for the Commission and the Office of the Public Counsel (“OPC”)  
8 before it develops the details of its marketing and education plan.  
9 Evergy is developing a scope of work in a request for proposal  
10 (“RFP”) that marketing agencies will respond in the coming months,  
11 which will include (but not limited to) development of a marketing  
12 campaign, education materials and customer communications.  
13 Engaging with Staff and OPC early will be important to ensure that  
14 Evergy is thoughtfully incorporating stakeholder feedback as it  
15 develops and evaluates responses to the RFP.

16 10) Evergy offers to engage with Staff and OPC in an initial  
17 workshop in March 2023 that will include a further update on  
18 Evergy’s activities that have occurred and planned for the upcoming  
19 months related to the implementation; share best practices from  
20 other utilities that have implemented (or are preparing) mandatory  
21 TOU rates; and solicit ideas from Staff and OPC. At a minimum,  
22 Evergy also offers to engage with Staff and OPC in a second  
23 workshop in May to share a firmer education and marketing plan  
24 with milestones, as well as a continued update on activities. Evergy  
25 would be amenable to a further stakeholder workshop(s) and/or  
26 Commission presentation prior to October 2023.

27 **Q: Why does Evergy believe the workshops were successful?**

28 A: To prepare for the first workshop, Evergy engaged the Brattle Group to provide insights  
29 into best practices from other utility TOU implementations. Their analysis included an  
30 examination of the applicability of these practices to Evergy's transition and an assessment  
31 of the expected bill impacts to customers due to default TOU rates. We felt these topics  
32 were crucial for initiating discussions on which tactics Evergy should incorporate into our  
33 campaign and identifying customer groups that might require additional support during the  
34 transition.

1           Given the absence of supporting testimony or analysis during the 2022 Evergy Rate  
2 Case regarding the customer impacts of default TOU rates and the four rate plans that  
3 resulted from the *Amended Report and Order*, understanding the impacts to customers was  
4 imperative for our education planning. Prior to this presentation, the true impact to specific  
5 customer segments such as space heating customers or vulnerable groups like seniors and  
6 low-income customers was not fully known with the four approved TOU rate plans. The  
7 data provided by the Brattle Group played a pivotal role in Evergy's comprehension of how  
8 the new rates would affect different customer groups and provided stakeholders and the  
9 Commission with valuable insights into these impacts. We felt sharing these findings with  
10 Staff and OPC was essential for developing the education campaign and collaboratively  
11 determining any segments that may require additional or tailored communications.

12           However, Evergy was taken aback by the responses from Staff during the  
13 workshop. Staff's conduct created an atmosphere that felt unprofessional, which ultimately  
14 resulted in the workshop ending prematurely, hindering meaningful dialogue and  
15 discussion. Despite coming to the workshop open to collaboration, Evergy encountered a  
16 situation where dialogue was stifled by the situation. Staff gave no indication before the  
17 meeting that they did not agree with the agenda for the meeting or offer other agenda items.  
18 In Ms. Lange's testimony, she makes the claim that, "Evergy did not meaningfully work  
19 with Staff" (Lange. Page 34, Line 14). To see Ms. Lange make this statement is shocking  
20 based on the behavior from Staff in the first workshop and the collaborative workshop  
21 approach.

22           Contrary to Ms. Lange's claim in her testimony, Evergy made concerted efforts to  
23 work meaningfully with Staff. Evergy came to the workshop open to discussion and ready



1 to discuss plans together and was met with unprofessional, uncollaborative behavior that  
2 shut down dialogue, discussion and ultimately, ended the meeting prematurely. Following  
3 the meeting, other Staff members apologized for the behavior in the workshop.

4 In the second Workshop, Evergy presented the TOU Customer Education Plan to  
5 Staff, OPC, a member of the Commission, and Commission advisors. By the second  
6 Workshop, Evergy had taken Staff and OPC's feedback from the first workshop and from  
7 three different data requests/written feedback and was able to incorporate many of those  
8 suggestions into our Customer Outreach and Education Plan. Even after both workshops,  
9 we continued to make changes based on feedback from stakeholders.

10 **Q: Can you describe some of the suggestions and feedback Evergy included from**  
11 **stakeholders?**

12 Evergy valued the ongoing discussion with and feedback from both OPC and Staff  
13 as we worked to finalize and expand our customer education campaign. We carefully  
14 considered the feedback and insights provided during Workshop #1, Workshop #2, and  
15 through the extensive conversations and filings in the workshop docket.

16 As a result of this collaborative process, Evergy implemented numerous changes to  
17 our approach based on the discussions and feedback received from Staff and OPC. Some  
18 of the key areas where adjustments were made include:

19 1. **Campaign Timeline Change:**

20 Taking into account the feedback from Staff and OPC, Evergy moved up  
21 the customer education campaign by two months. As a result, the customer  
22 education campaign launched in June 2023. We deemed it essential to align  
23 the launch of customer communications with the availability of key

1 customer tools like the Rate Comparison Tool, Change My Rate tool, and  
2 Rate Education Reports, which weren't available until late June.  
3 Additionally, we wanted to ensure our contact center was adequately  
4 prepared and staffed to accommodate any increase in customer inquiries,  
5 which required time to train and hire. All workstream timelines were  
6 changed as a result of the feedback from Staff and OPC.

7 **2. Rate Name Changes:**

8 In response to the feedback from Staff and OPC, Evergy decided to modify  
9 the name of the default rate (at that time) from "Seasonal Peak Saver" to  
10 "Standard Peak Saver." This change addressed Staff's concerns expressed  
11 during the Workshops and aims to clarify which rate is the new default plan  
12 while minimizing the emphasis on seasonal differentials. Although we hold  
13 a respectful difference of opinion regarding Staff's assessment that the  
14 names were submitted without sufficient time for substantial feedback, we  
15 view this example of altering the rate name in response to Staff's input as a  
16 genuine commitment to actively engage in the discussion and incorporate  
17 their feedback.

18 **3. Updating Overarching Campaign Message and Adding More "Why"**  
19 **to TOU Materials:**

20 During the workshops and filings, there was a discussion regarding the  
21 inclusion of more prominent messaging around the rationale behind the  
22 Commission's order to transition all rate plans to TOU. Specifically,  
23 emphasizing the significance of time-based energy usage and the price

1 differentials at different times of the day. In response to this feedback,  
2 Evergy adapted the campaign messaging to prioritize the "why" messages  
3 earlier in the campaign. While including a detailed explanation in every  
4 piece of educational material was not always feasible due to space  
5 limitations, we made a concerted effort to incorporate more "why"  
6 statements across our materials, starting with Phase 1.

7 Based on feedback from Staff and OPC, Evergy included additional  
8 educational details within the messaging, enabling more detailed  
9 explanations. We incorporated information that highlights how the plans  
10 charge higher rates during peak times and lower rates during off-peak  
11 periods into our Phase 1 messaging, consistently reinforcing this message  
12 throughout the campaign.

13 4. **Prioritizing Education to Impacted Customers:**

14 Evergy's campaign worked to ensure that all customers were aware of the  
15 pending change to TOU rates and that they understand that the time of day  
16 is associated with the costs of the rate, while also providing additional  
17 content and outreach to special customer groups, like those customers  
18 impacted by the removal of the space heat discount. As shared in Workshop  
19 #2, Evergy provided additional outreach to these special customer groups  
20 to help support them as they work to shift their usage.

21 5. **Rate Descriptions:**

22 Evergy's approach, as recommended in Staff's response to Workshop #2,  
23 involves pairing rate names with descriptions and illustrations of rate

1 periods wherever possible. This comprehensive information can be found  
2 prominently on our website and also included in other educational  
3 materials, such as direct mails, the Rate Education Report, educational  
4 videos, and emails, whenever space allows.

5 **6. Rate Analysis Tool Description Wording:**

6 During the review of the Rate Analysis Tool, Staff and OPC requested  
7 additional language to highlight that not shifting energy usage outside of-  
8 peak hours can result in increased costs. Evergy collaborated with our tool  
9 vendor to include this language, ensuring that the tool not only emphasize  
10 potential cost savings but also addresses the potential cost increase that  
11 results when usage is not shifted away from peak hours.

12 **7. Outreach to Food Pantries and Libraries:**

13 Evergy expanded its community outreach plan to include food pantries,  
14 libraries, and other social service organizations that are connected to the  
15 community and can help extend our reach to customers, especially hard-to-  
16 reach customers. We provided training and materials related to the TOU  
17 transition to these institutions. Moreover, we organized events in  
18 collaboration with these groups throughout the summer and fall of 2023.  
19 OPC acknowledged this effort in their July 14, 2023, Memorandum in Case  
20 Number EW-2023-0199 that stated, “The Company has indicated that it  
21 expanded its community outreach to include food pantries, libraries, and  
22 other social service organizations...”.

1                   8.     **Videos and YouTube Videos:**

2                   While Evergy was planning some videos, Evergy took the feedback  
3                   provided by OPC in their July 14, 2023, Memorandum and created  
4                   additional educational videos based off of examples they provided from  
5                   other utilities. In the end, Evergy created ten videos and have used them on  
6                   YouTube.

7                   9.     **Using Visual Representation like Tucson Electric:**

8                   Evergy developed an energy graphic very similar to that of Tucson Electric,  
9                   as requested by OPC in their July 14, 2023, Memorandum to show the  
10                  relationship of energy and demand and to help customers visually  
11                  understand the need to move large appliance usage to off-peak times.

12 **Q:     Does Evergy believe that its TOU Implementation Plan has been successful?**

13 A:     Yes, I firmly believe that Evergy's TOU implementation has been successful in both  
14     engaging and educating customers, and the comprehensive customer research and  
15     engagement metrics substantiate this assessment. It's essential to recognize that Evergy's  
16     customer education campaign is ongoing, with two more phases yet to unfold.

17                  Our third-party customer research has shown that Evergy's Customer Campaign  
18     has been successful in creating awareness among Missouri residential customers. By the  
19     end of November, 87% of Missouri residential customers had heard about Evergy's time-  
20     based rates. That is a 93% increase from the baseline measurement in June, truly showing  
21     that customers are engaged in the topic. Also, the number of Missouri residential customers  
22     who recall Evergy communications about the new time-based rates more than doubled in  
23     those few months (increased from 32% to 89%). Customers rated their knowledge just

1 above the mid-point on the 7-point scale. However, when asked what they believe to be  
2 true about time-based plans, most correctly identify the key aspects of time-based plans,  
3 showing that they are educated on the plans and TOU. Customers became increasingly  
4 familiar with the plans throughout the campaign, with 82% being familiar with the plans  
5 by the end of the year. Those indicating they know “a lot” or “a good amount”, increased  
6 a significant +7 percentage points in Wave 3 of our 3<sup>rd</sup> party research.

7 Furthermore, our Engagement Data reveals over 300,000 sessions to our TOU  
8 Campaign landing page and over 340,000 unique visits to our Compare My Rate Tool,  
9 with approximately 160,000 customers selecting their rate plan before the transition. This  
10 data underscores the robust engagement generated by our campaign.

11 Our campaign helped make peak and off-peak household names. Conversations  
12 about TOU were happening at supermarkets and churches, between friends and neighbors.  
13 Whether a customer likes TOU or not, they were fully engaged in the transition, had an  
14 understanding of the key components of TOU, and are more aware of their rate plan and  
15 energy usage and costs than ever before.

16 **Q: Staff’s Complaint makes the claim that Evergy’s Filing of an Application for**  
17 **Approval of Tariff Revisions in case ET-2024-0061 and the attached Exhibit A in that**  
18 **filing demonstrates that Evergy failed to engage and educate customers, do you**  
19 **agree?**

20 A: I respectfully disagree with Staff’s claim, and the data corroborates this viewpoint. The  
21 evidence presented in Staff’s Complaint lacks substantiation and fails to reference  
22 supporting details from the Application for Approval and Exhibits. Contrarily, the  
23 *Application*, particularly Exhibit A, illustrates a starkly different narrative. By August

1 2023, merely a few months into the 18-month campaign, 76 percent of customers were  
2 already aware of the transition to TOU rates, with the number of customers recalling  
3 Evergy’s communications about TOU rates more than doubling since June’s baseline.  
4 These metrics unequivocally demonstrate successful customer engagement. It's crucial to  
5 note that the data in Exhibit A was gathered two full months before the transition to TOU  
6 rates commenced and before Phase 2 of the Customer Campaign had been fully rolled out,  
7 rendering Staff’s Complaint premature. Research results for September, October,  
8 November, and December of 2023 all showed large increases in awareness, recall, and  
9 TOU understanding.

10 Moreover, Evergy's filing of the *Application for Approval of Tariff Revisions* in  
11 case ET-2024-0061 occurred subsequent to the Commission Agenda Meeting on  
12 September 30, 2023. During this meeting, Commissioners suggested Evergy make a  
13 revised tariff filing. In response to this suggestion, Evergy promptly filed the *Application*  
14 days later based on the Commission's Agenda meeting discussion. Therefore, the timing of  
15 Evergy's filing aligns with the Commission's guidance and underscores our commitment  
16 to cooperation and responsiveness.

17 **Q: Do you have a response to Count 6 of the Staff’s Complaint which alleges that**  
18 **Evergy’s attempts at customer education were unreasonable in that they were**  
19 **alarmist and failed to include simple information describing time-based rate plans?**

20 A: While Staff’s Complaint gives little direction on what they felt was alarmist or where it  
21 failed to provide simple information about TOU rate plans, Staff’s witnesses, Ms. Lange  
22 and Ms. Fontaine, provide more details on their concerns. The witness claims that Evergy’s  
23 education material was alarmist due to the use of the phrase “mandatory” in some

1 communications and that Evergy failed to provide simple information because we  
2 suggested customers shift their usage to off-peak times. I provide much more detail on both  
3 issues in Section II of my testimony, but I will quickly address both now.

4 To start, the Company uses “mandatory TOU rates” to distinguish between  
5 programs or utilities who have optional time-based rate programs and those who have  
6 required time-based rate programs. This helps distinguish between Evergy’s past TOU rate  
7 program, which allowed for optional TOU rates, and Evergy’s new program which requires  
8 customers to be on TOU rates. Merriam-Webster lists mandatory as a synonym of required.  
9 Staff, OPC and multiple Commissioners have referred to default TOU rates as “Mandatory  
10 TOU” in multiple discussions and proceedings leading up to and after the Order to move  
11 to Default TOU rates was given, which I provide detailed examples of in my testimony in  
12 the next section. I do not believe Staff, OPC, or the Commission was being alarmist in their  
13 use of calling default TOU as “mandatory TOU” and neither was Evergy. Second, Staff  
14 claims Evergy failed to provide simple information about TOU rate plans because, “The  
15 plan descriptions continue to rely on copy regarding the need to shift timing of energy  
16 consumption to save.” (Lange. Page 36. Line 29). Testimony from Staff suggests that  
17 Evergy shouldn’t have made customers aware that they should shift their energy usage  
18 away from peak times to save money. Staff’s Complaint is driven by the fact that they did  
19 not want customers to be educated about the importance of behavior changes.

20 Together, it appears the reason for Staff’s Complaint #6 was that Evergy had been  
21 transparent with customers about a required change to their energy rate and that this new  
22 change would mean that they should shift some of their usage to off-peak times, when



1 energy prices are cheaper. A change that Staff championed but now seems that they would  
2 prefer that customers not understand.

3 **Q: As a part of Staff Complaint 6, are you aware of the customer complaints and**  
4 **concerns around short/long bills for customers who elected to change rates prior to**  
5 **the transition?**

6 A: Yes. As part of the TOU pilot in 2019, Evergy built a process that allowed customers to  
7 have their rate change effective the next business day. This assisted in getting customers  
8 on the rate they wanted as soon as possible and assisted in driving immediate behavior  
9 change once a customer decided a TOU rate was for them. While this process worked  
10 well for a small pilot, during the TOU conversion when 30% of customers pre-selected  
11 their plan, more customers were affected by long/short bills and concerns became more  
12 apparent. Staff engaged Evergy on the issue and since then Evergy implemented a solution  
13 to change rates on bill cycles to eliminate this issue.

14 **Q: Were there changes made to the process after the complaints were received?**

15 A: Yes, while Evergy believes our process was fair, customer friendly and not in violation,  
16 we did listen to the concerns of customers and staff and moved forward with a change for  
17 customers who elected to change their rates. Evergy worked with Staff on solutions and  
18 researched how other Missouri utilities handle rate changes with customers. As of January  
19 10th, any customer who changes rates online or with a CSR will be enrolled in the new rate  
20 at the start of their next bill cycle. By moving to this timing of effective date, a full month  
21 will be billed on the current rate as well as the new rate going forward.

1 **Q: Do you believe Evergy has resolved this concern?**

2 A: Yes. While this is a change to the customer experience, this solved the issue that was a  
3 concern from Staff and some customers as it relates to billing and changing rates.

4 **II. RESPONSE TO DIRECT TESTIMONY OF STAFF WITNESSES**

5 **Q: On page 32 of Ms. Lange's direct testimony, she testifies that Evergy failed to**  
6 **adequately educate its customers consistent with the Commission's Amended Report**  
7 **and Order. Do you agree with her testimony on that point?**

8 A: I believe Ms. Lange's testimony is confusing and I disagree with her findings. Ms. Lange's  
9 testimony and claim is based on two items. First, she makes the claim that "Evergy failed  
10 to **adequately** educate its customers consistent with the order." While Ms. Lange's opinion  
11 may be that the campaign was inadequate, and my prior testimony and research conducted  
12 by a third party proves otherwise, her testimony admits that Evergy conducted a campaign  
13 to engage and educate customers, which was the requirement of the Order, whether it was  
14 adequate or not, was not the subject of the Order or Staff's Complaint. This admission  
15 undermines the core of Staff's Complaint, which alleges that Evergy did not conduct a  
16 campaign at all.

17 Secondly, Ms. Lange's statement that, "[N]o information at all would have been  
18 better" (Lange. Page 34, Line 4) is concerning. I firmly believe that the more than 130,000  
19 customers who pre-selected a rate are better off being informed about their rate options and  
20 being empowered to choose the plan that best suits their family's needs. The 90 percent of  
21 customers who were aware of the switch to time-based rates are also better off for  
22 understanding that their electricity is more expensive during certain periods. To suggest  
23 that customers would be better off not knowing about the opportunity to access less

1 expensive energy during off-peak times and weekends, and to have more control over their  
2 energy is insulting to Evergy customers. To say Evergy's information was "wrong" is  
3 untrue and Ms. Lange gives no evidence to back up her claim, only her opinion. Evergy  
4 customers are more aware of how peak usage affects their energy bill and the power grid  
5 more than ever before and that is something we all should be proud of. Unfortunately, Ms.  
6 Lange seems to think Evergy customers should be left in the dark about their energy rates.  
7 I certainly disagree with that.

8 **Q: On page 34 of Ms. Lange's direct testimony, she alleges that "Evergy did not**  
9 **meaningfully work with Staff and OPC and permit them a chance to review materials**  
10 **related to the education program and to the implementation of TOU rates. Is her**  
11 **testimony on this point correct?**

12 **A:** As outlined in my prior testimony, Evergy has consistently demonstrated a commitment to  
13 working collaboratively with Staff and OPC throughout this implementation, and  
14 incorporated several changes based on their feedback. Furthermore, Evergy proposed a  
15 Customer Campaign schedule that allowed for multiple workshops with Staff and OPC  
16 before launching the campaign, ensuring ample time for feedback and collaborative  
17 refinement. Ms. Lange's testimony and Staff's Complaint suggests that Evergy should have  
18 started our Customer Campaign exactly 10-months before the start of the transition, which  
19 would have left no time to have any meaningful discussion or time to review materials.  
20 Staff continues to contradict themselves in this area where they wanted a campaign to start  
21 immediately but also wanted time to review. Evergy chose to hold workshops and  
22 discussions and take feedback as guided by the Commission Orders. Ms. Lange's  
23 disagreement with this timeline underscores the divergent perspectives on the necessary

1 preparations for an effective campaign. It is worth noting again that OPC's  
2 acknowledgment of Evergy's efforts in their memorandum reflects a different viewpoint  
3 from Ms. Lange's testimony. OPC responded in their July 14, 2023, Memorandum in Case  
4 Number EW-2023-0199 with, "The Office of Public Counsel ("OPC") appreciates the time  
5 and effort Evergy Missouri, Inc. has spent with shareholders to discuss Evergy's transition  
6 to Time of Use ("TOU") Rates."

7 As stated earlier, Evergy made changes to its proposed campaign in a number of  
8 ways based on feedback from Staff and OPC and are still open to making updates and  
9 changes as we hear additional feedback from Staff and OPC. Many of Staff's requests for  
10 changes were to our third-party tools, so it's important to highlight that Evergy's ability to  
11 implement every suggestion may be limited by the constraints of the software provided by  
12 our vendor.

13 Nonetheless, we have engaged in meaningful discussions with our vendor to  
14 address feedback and have successfully implemented several updates and additions. For  
15 instance, we clarified language in the Rate Simulator to emphasize the potential cost  
16 implications of not shifting usage, enhanced explanations of the reasons behind Evergy's  
17 transition to time-based rates in our Rate Education Reports and provided more detailed  
18 plan descriptions in various communications.

19 Some of Staff's recommendations were concerning. For example Ms. Lange shares  
20 in her testimony (Lange. Page 58, Line 26), "Evergy should also consider methods to omit  
21 months with this (major weather events) sort of major disruption from the rate comparison  
22 tools," which was not possible based on the tool set Evergy purchased from the vendor.

1 Furthermore, omitting crucial data points from a customer's billing analysis would have  
2 been inappropriate and potentially misleading.

3 In summary, while Evergy remains committed to incorporating feedback and  
4 making necessary adjustments to our campaign, some suggestions may not be feasible  
5 within the constraints of our vendor's tools or may not align with best practices in customer  
6 communication and transparency.

7 As a reminder, here were some of the areas we made updates based on stakeholder  
8 feedback:

- 9 ▪ Campaign Timeline: Moved up campaign by two months
- 10 ▪ Rate Names: Updated default plan name
- 11 ▪ Updating Overarching Campaign Message and Adding More "Why" to  
12 TOU Materials: Added more why messaging
- 13 ▪ Prioritizing Education to Impacted Customers: Added additional outreach  
14 to special customer groups.
- 15 ▪ Rate Descriptions: Updated descriptions
- 16 ▪ Rate Analysis Tool Description Wording: Worked with vendor to update  
17 language
- 18 ▪ Outreach to Food Pantries and Libraries: Added more food pantries and  
19 libraries
- 20 ▪ Videos and YouTube Videos: Created additional videos and added to  
21 YouTube
- 22 ▪ Using Visual Representation like Tucson Electric: Created visual and used  
23 in outreach and education materials

24 **Q: On pages 35-38 of her direct testimony, Ms. Lange criticizes Evergy's adoption of the**  
25 **names of the TOU rate plans. Do you have any comments?**

26 A: The rate names were crafted following customer research and industry comparisons.  
27 Evergy adhered to best practices in naming, drawing from insights provided by ESource, a

1 respected utility research organization. These practices emphasized conveying customer  
2 benefits through descriptive language, employing customer-friendly terminology, using  
3 simple language devoid of technical jargon, and highlighting potential cost savings.  
4 Evergy's approach aligned seamlessly with these established best practices.

5 Moreover, Evergy's rate names mirrored similar structures utilized by peer utilities  
6 such as Ameren Missouri, Consumers Energy, WE Energy, Georgia Power, and Alliant  
7 Energy. Some examples include, Ameren Missouri, which employs "Saver" for each of  
8 their residential TOU rates; Consumers Energy, which features a "Nighttime Savers" rate;  
9 WE Energy; which uses "Savings"; and Georgia Power and Alliant Energy, which utilizes  
10 the "Nights and Weekends" name description. Evergy observed that the inclusion of  
11 "Saver" in the rate names effectively communicated both customer benefits and the  
12 necessity for customer action, such as shifting usage to off-peak hours. Notably, Evergy  
13 was unaware of any concerns raised by Staff regarding the naming conventions employed  
14 by Ameren Missouri, which were made public months before Evergy's campaign, and  
15 which very closely resembled those rate names used by Evergy.

16 In response to feedback from Staff and OPC, Evergy made adjustments to the name  
17 of the default rate, transitioning from "Seasonal Peak Saver" to "Standard Peak Saver."  
18 This modification, prompted by concerns expressed during Workshop #2, aimed to provide  
19 clarity regarding the default TOU rate while minimizing emphasis on seasonal variations.  
20 This change underscores Evergy's genuine commitment to engaging in constructive  
21 dialogue and incorporating feedback. It serves as tangible evidence that Evergy afforded  
22 Staff sufficient time to review rate names and messaging, enabling meaningful  
23 collaboration and refinement before anything was finalized and too late to make changes.

1           During Workshop #2, Staff members also suggested simplifying rate names to  
2 numerical or alphabetical designations such as "1, 2, 3, and 4" or "A, B, C, and D." While  
3 Evergy respectfully disagreed with this suggestion, it nevertheless valued the input and  
4 made additional updates to all plan names based on feedback from stakeholders.

5           Evergy's meticulous approach to naming its rate plans, coupled with its  
6 responsiveness to feedback from Staff and stakeholders, underscores its commitment to  
7 transparency, customer engagement, and continuous improvement. In the end, Evergy  
8 made additional updates to all plan names based on feedback from stakeholders, and made  
9 sure to include rate plan descriptions in all materials to explain the nuances of each rate  
10 plan.

11 **Q: Beginning on page 39 of her direct testimony, Ms. Lange testifies that “Evergy’s**  
12 **promotional and educational materials and filings were misleading concerning**  
13 **customer impact.” Do you have a response to this allegation?**

14 A: Ms. Lange's testimony suggests that Evergy should not have provided educational  
15 materials encouraging customers to shift their energy usage to off-peak times or offered  
16 tips on how to do so. To start, Ms. Lange is acknowledging that Evergy did, in fact, provide  
17 educational materials promoting the shifting of energy usage to off-peak times. This  
18 practice aligns with one of the primary objectives of implementing TOU rates, which is to  
19 incentivize and educate customers to adjust their energy consumption patterns to off-peak  
20 periods. Ms. Lange testimony states:

21           The plan descriptions continue to rely on copy regarding the need to  
22 shift timing of energy consumption to save. In reality overall bill  
23 savings relative to the Default Time Based Rate Plan may result for  
24 many customers without any behavior modification.

25           The Default description states that “Customers who are not able to  
26 easily shift the time they use energy should consider this rate plan,”

1 but based on the sample bill information Evergy has provided to  
2 date, most customers would receive the lowest annual bill under the  
3 “Summer Peak Time Based Plan,” without any behavior  
4 modification. (Lange. Page 36, line 29)

5 The Commission's *Amended Report and Order* for default TOU rates for Evergy  
6 customers underscores the importance of encouraging energy usage during off-peak hours  
7 to optimize the efficiency of the electrical grid and reduce overall costs. By providing  
8 educational materials that emphasize the benefits of shifting energy usage to off-peak  
9 times, Evergy aimed to empower customers to make informed decisions that can lead to  
10 cost savings and contribute to a more sustainable energy future. In essence, the provision  
11 of educational materials promoting off-peak energy usage aligns with the overarching  
12 objectives of the Commission's Order and underscores Evergy's commitment to educating  
13 and empowering its customers. I am surprised that Ms. Lange would suggest to do nothing.

14 Ms. Lange's assertion that Evergy should not have encouraged customers to shift  
15 their energy usage or provide educational tips on TOU rates stems from her belief that  
16 some customers may save without altering their behavior. She argues against the notion of  
17 promoting behavior changes, suggesting that it may not be necessary since some customers  
18 may not need it to achieve savings under TOU rates. In her testimony, Ms. Lange expresses  
19 disagreement with the provision of educational TOU tips, indicating a preference for a  
20 more passive approach that does not actively encourage customers to modify their energy  
21 consumption habits. This perspective implies a reluctance to advocate for behavioral  
22 changes and suggests a preference for a more hands-off approach to customer education  
23 on TOU rates. For example, Ms. Lange states in her testimony (Lange, Page 38. Line 9):

24 **Q: Do customers on the then “Peak Reward” plan need to keep**  
25 **use low during peak hours?**



1 A: No. Nor do those customers need to use large appliances during  
2 Super Saver hours.

3 **Q: Do customers on the Nights & Weekends plan need to**  
4 **schedule thermostats and large appliances to experience bill**  
5 **reductions?**

6 A: No.

7 Ms. Lange's stance underscores a philosophical difference in approach, with Evergy  
8 advocating for proactive customer engagement and empowerment through education on  
9 important TOU practices, like shifting usage to off-peak times, while Ms. Lange advocates  
10 for a more passive approach that does not actively promote behavior changes. I believe this  
11 also goes against OPC's opinion, which in both the November 2023 and April 2024 TOU  
12 On-The-Record Commission presentations, issued comments saying that the true measure  
13 of the campaign should be on customers making behavior changes to move their usage  
14 away from peak times:

15 "...the purest and best use of time of use rates is hopefully to  
16 eventually reduce peak energy usage and by extension reduce  
17 energy costs...which should in turn lower customer bills." – John  
18 Clizer, November 28, 2023, Evergy's TOU On-The-Record  
19 Presentation.

20 "...I want to remind people that the true benefit of time of use rates  
21 is the capacity to mitigate peak load by changing how customers  
22 consume electricity." "...I hope we have more and more emphasis  
23 placed on convincing people to change their consuming habits..." –  
24 John Clizer, April 2, 2024, Evergy's TOU On-The-Record  
25 Presentation.

26 While it's true that some customers may experience savings under TOU rates  
27 without making any behavior changes, actively promoting and educating customers on the  
28 benefits of shifting energy usage to off-peak periods is crucial. Encouraging customers to  
29 make small adjustments to their energy usage patterns not only presents an opportunity for  
30 them to potentially save even more money but also enables them to play a role in reducing

1 peak demand, which can have broader benefits for the entire utility system. By educating  
2 customers on TOU rates and providing them with practical tips on how to save money  
3 through off-peak usage, Evergy is empowering customers with information that can lead  
4 to more efficient and sustainable energy consumption practices. In addition, education  
5 about shifting your usage is one of the best protections against getting a surprise high bill,  
6 in the event a customer moves from saving under TOU rates to not saving based on changes  
7 in their life. By not sharing behavior shifting educational information, as Ms. Lange  
8 suggestions, puts customers more at risk for higher energy bills.

9 Suggesting that Evergy's efforts to educate customers on behavior shifts and  
10 potential cost savings are misleading undermines the fundamental purpose of TOU rates.  
11 The goal is not only to inform customers of rate changes but also to empower them to make  
12 informed decisions that can lead to both personal savings and broader benefits for the utility  
13 and the community as a whole. Isn't this the exact outcome of the Commission's December  
14 2022 Order? To suggest that Evergy is being misleading because we are encouraging  
15 customers to make some behavior shifts to off-peak times and provided them ways they  
16 could save money, or even more money, goes against the point of having TOU rates.

17 Ms. Lange's position also goes against Staff's position on TOU rates education in  
18 past agreements and discussions. For Example, in Evergy's *Non-Unanimous Partial*  
19 *Stipulation and Agreement Concerning Rate Design* Issues in case ER-2018-0145/0146,  
20 Staff and Evergy agreed that during the TOU Pilot the Company would:

21 KCP&L and GMO will demonstrate that such percentage is not  
22 simply a result of transferring customers to a lower rate, but based  
23 on efforts directly related to changing customer behavior through  
24 marketing and education. (Page 8, Item L)

1           Which according to Guidehouse’s analysis of Evergy’s Pilot, shared with Staff and  
2 the Commission in ER-2018-0145/0146, Guidehouse found that even those customers who  
3 automatically benefited from TOU rates still shifted usage away from peak times to save  
4 even more money. Now it seems Staff is changing their position and no longer wants  
5 customers to reduce peak usage or have additional cost savings.

6           Moving on to Ms. Lange’s review of Evergy’s communication materials, Ms.  
7 Lange uses only some short descriptions of the rate plans in her testimony. Her review  
8 leaves out and ignores most of the communication items about the rate plans. But that is  
9 not surprising, as Staff filed their complaint while Evergy was just starting Phase 2 of our  
10 five-phase outreach campaign and before fully reviewing the customer educational  
11 materials. Staff’s own Complaint highlights the fact that they had yet to review the  
12 education materials, but were already calling them alarmist, misleading and inaccurate  
13 when they say, *“Concurrent with the filing of this complaint, Staff is propounding to*  
14 *Evergy a request for production of all ads, educational materials, and social media posts.*  
15 *Staff will file an amended complaint within a reasonable time of the production of these*  
16 *materials that more specifically identifies misleading, alarmist, and inaccurate content.”*  
17 Even in their amended complaint, assuming Staff reviewed the requested educational  
18 materials, they gave no additional details or facts in Counts 5 or 6.

19           These statements show that Staff had already made up their mind on the issues  
20 before even requesting educational materials, a sentiment that Evergy also felt throughout  
21 the multiple workshops sessions as the Company tried to have constructive and productive  
22 working sessions with Staff.

1 Ms. Lange also shares some of Staff's recommendations in her testimony and  
2 suggests that Evergy use language similar to Liberty Utilities, including (Lange. Page 54.  
3 Line 14):

4 Staff notes that much of the confusion and opposition to the  
5 adoption of a time-based rate plan for the default residential rate  
6 structure lies squarely with Evergy's approach to customer  
7 engagement and education. As a point of comparison, Liberty  
8 Utilities provided straightforward information to its customers  
9 during its defaulting period, such as the following:

10 (Staff provided example from Liberty Utilities)

11 **Why the change?**

12 Time matters, especially when it comes to energy costs. The higher  
13 the demand for energy, the more it costs to generate. At peak times,  
14 typically during the day, energy demand increases and, as a result,  
15 energy costs increase. The opposite is true for off-peak times,  
16 typically at night, when energy demand drops, and energy costs  
17 decrease.

18  
19 If Ms. Lange had reviewed Evergy communications, provided to Staff  
20 multiple times, Ms. Lange would have realized that Evergy does use very similar  
21 language to that of Liberty when describing our plans and the reasons for moving  
22 to time-based rate plans. Please see Evergy's version below which was placed on  
23 the website and in customer communications:

24 (Evergy's Language)

25 **Why is Missouri moving to time-based plans?**

26 Supply and demand play an important part in the overall cost to  
27 produce energy. When there is a high demand for energy during the  
28 peak hours, producing energy becomes more expensive. On the  
29 other hand, when energy demand is lower, the cost to produce  
30 energy goes down. With the new time-based rate plans, you'll pay  
31 less for energy during the off-peak times, which are most of the time,  
32 and more during the few peak hours.

33 It's noteworthy that Ms. Lange suggests wording examples that closely resemble  
34 Evergy's materials, making it challenging to discern significant differences. Despite this,

1 she criticizes Evergy for its proactive approach to educating customers on behavior shifts  
2 and providing valuable TOU tips. This criticism seems to overlook the fundamental  
3 purpose of TOU rates, which is to encourage customers to adjust their energy consumption  
4 patterns to off-peak periods for both personal savings and broader utility benefits.

5 Ms. Lange's testimony appears to focus heavily on suggesting wording or naming  
6 changes without providing evidence of any materials developed by Evergy that were  
7 genuinely misleading. Furthermore, her criticism seems to center on Evergy's efforts to  
8 educate customers about the importance of shifting their energy usage behavior to off-peak  
9 times and providing them with essential tips related to TOU rates. Additionally, Ms.  
10 Lange's examples of Staff suggesting Evergy to be less transparent with customers, such  
11 as omitting months of usage data, raises concerns. Advocating for such practices  
12 undermines the principles of transparency and honesty in customer communications, which  
13 are essential for fostering trust and credibility.

14 Overall, it appears that Ms. Lange's testimony may reflect a difference in  
15 philosophy regarding the approach to customer education on TOU rates. While Evergy  
16 prioritizes transparency and empowerment through proactive education about the benefits  
17 of shifting usage, Ms. Lange's suggestions and criticisms seem to lean towards a more  
18 passive or restrictive approach, which do not align with the broader objectives of TOU rate  
19 implementation.

1 **Q: Ms. Lange direct testimony also suggests that “Evergy failed to educate heating**  
2 **customers concerning the elimination of promotional discounted rates.” Do you have**  
3 **a response to this allegation?**

4 A: First, I think it’s important to point out that Evergy was not required to educate customers  
5 on the elimination of the so called “promotional discounted rates.” Our requirement, as  
6 pointed out by Staff multiple times in their Complaint, was to engage and educate  
7 customers on the time of use rates. Ms. Lange’s testimony also points out that Evergy did  
8 indeed communicate and worked to educate heating customers about the elimination of  
9 their old rate. Ms. Lange correctly calls out:

- 10 1. In August 2023, Evergy emailed, “A note about electric heating,”  
11 (Lange, Page 39. Line 10)
- 12 2. In September 2023, Evergy emailed customers “An important note  
13 about your old rate plan” (Lange, Page 40. Line 1)

14 In addition to these items, Evergy also sent direct mail to heating customers in  
15 September 2023 and continued to provide them educational information in the winter  
16 months of 2024. Some of the language used in these communications included:

17 **An Important Note About Your Old Rate Plan**  
18 Your old plan offered a discounted rate in the winter for electric  
19 space heating customers, which is no longer offered. Due to this  
20 change, customers with electric heat may experience more impact  
21 moving to time-based rate plans, making it especially important to  
22 understand your home energy usage, and shift large appliances  
23 usage, like doing laundry and running the dishwasher, to off-peak  
24 times.

25 As you can see, Evergy paid special attention to electric heat customers, sending  
26 them additional communication to educate them on the impact of the switch to TOU  
27 rates, and letting them know that they may see a bigger impact to their bill in the winter  
28 on a time-based plan.

1 **Q: On page 40, lines 13-14, Ms. Lange mentions that Staff recommended that Evergy**  
2 **accelerate its planned educational timeline. Did Evergy adopt Staff's**  
3 **recommendation to accelerate the initiation of its educational plans?**

4 A: Yes, as previously stated in my testimony, accelerating the education timeline was one of  
5 many suggestions that Evergy agreed to from Staff and OPC. Evergy moved up our  
6 proposed timeline by about two months, starting the campaign in June 2023, which was  
7 about five months before the transition started and seven months before the date to have  
8 all customers moved to TOU. As noted, Evergy did not feel starting the campaign any  
9 earlier was possible or best for the customer due to multiple reasons, including:

- 10 1. Commission Order requiring time for workshops and collaboration with  
11 Staff and OPC
- 12 2. Technical enhancement needs for the new rates in the Rate Comparison  
13 Tool and availability of the tool to customers
- 14 3. Time to update the Change My Rate tool to allow online rate changes
- 15 4. Vendor time to model new rates for shadow billing/Rate Education Reports
- 16 5. Ability to conduct research and develop the customer campaign, including  
17 strategy, messaging and creative
- 18 6. Time to research and develop program names
- 19 7. Time to hire and train additional Customer Service Representatives
- 20 8. Ability to implement billing and system changes needed for default TOU

21 We felt strongly that having the tools in place was paramount before starting any  
22 customer communication and we believed the Commission supported that direction as they  
23 indicated during their November 9<sup>th</sup>, 2022, Agenda Meeting Discussion:

24 “Education is one thing but having the tools necessary in the form  
25 of software application on your phone. Being able to empower the  
26 ratepayer to track and monitor and control their own usage...” “As  
27 we go forward here, not just from an education standpoint of  
28 informing people but really providing them the tools necessary to be

1 successful with the program, I would strongly encourage” –  
2 Commissioner Holsman, November 9<sup>th</sup>, 2022, Agenda Meeting  
3 Discussion.

4 “...I absolutely agree with that. And I will say to the Company’s  
5 credit, they started to move to this technology years ago and on their  
6 customer outreach they do a great job offering different avenues and  
7 windows into their company and their customer experience. Chair  
8 Silvey, November 9<sup>th</sup>, 2022, Agenda Meeting Discussion.  
9 Commissioner Holsman, I agree 100%. I know the company based  
10 on the different things they have shown us has been investigating all  
11 the different technologies and things from the app from shadow bill  
12 they have been studying this and looking at what others have been  
13 doing around the country. I am excited to see how robust and  
14 innovative they can be.” – Commissioner Rupp, November 9<sup>th</sup>,  
15 2022, Agenda Meeting Discussion

16 “I don’t want the program to fail on the ratepayer side when the tools  
17 exist to help them be successful.” – Commissioner Holsman,  
18 November 9<sup>th</sup>, 2022, Agenda Meeting Discussion

19 Staff’s assertion that implementing default TOU rates and introducing multiple new  
20 rate options can be easily accomplished overlooks the significant complexities involved in  
21 such a process. Evergy emphasizes that implementing the Commission’s Order required  
22 extensive planning and coordination. One critical aspect to making this change was to  
23 synchronize the Customer Education Campaign with other customer tools and billing  
24 systems. This strategic alignment ensured that customers had access to essential resources  
25 such as the Rate Comparison Tool, online rate change options, and knowledgeable  
26 Customer Service Representatives. By timing the education campaign with these crucial  
27 components, Evergy aimed to enhance the overall customer experience and facilitate  
28 informed decision-making regarding rate options.



1 **Q: Turning to the Direct Testimony of Sarah Fontaine. On page 3 of her direct testimony,**  
2 **she testifies that “I would consider those [Evergy’s] measurements in regard to**  
3 **awareness to be successful based on those percentages. If the Order only required**  
4 **Evergy to engage and make customers aware, I would agree that they were quite**  
5 **successful in that area; however, I would not agree with the tactics they chose to use**  
6 **to accomplish this.” Do you have any comments regarding her testimony?**

7 A: Ms. Fontaine’s testimony contradicts Staff’s Complaint and Ms. Lange’s testimony in that  
8 she agrees that Evergy did engage customers with its TOU Customer Education Campaign,  
9 and she seems to suggest that customers are at least somewhat educated on TOU rates. Ms.  
10 Fontaine states (page 4, line 7) that, “Evergy complied with the Order in that it put together  
11 a plan to engage with customers so as to gain attention and increase the participation during  
12 the implementation of default TOU rates” and “If the Order only required Evergy to engage  
13 and make customers aware, I would agree that they were quite successful in that area...”  
14 (Page 5, line 2).

15 I agree with Ms. Fontaine on those points. Ms. Fontaine also seems to suggest that  
16 Evergy customers are educated on TOU rates just not in a “way so that customers fully  
17 understand.” (page 4, line 10). Ms. Fontaine’s testimony confirms that Evergy was quite  
18 successful in engaging customers in the TOU campaign, and by at least September 2023,  
19 still months before the December 2023 deadline to move all customers over to TOU rates,  
20 had developed at least a baseline knowledge of education. This testimony shows that  
21 Evergy’s campaign was working to educate customers about their new rates. Another proof  
22 point that Staff’s complaint was premature and biased. Ms. Fontaine’s testimony reaffirms  
23 that Evergy's campaign timeline was reasonable and aligned with the requirements of the

1 Commission's Order, allowing for ongoing education and engagement beyond the  
2 transition date.

3 To finalize my comments on Ms. Fontaine's testimony in this area, I go back to my  
4 previous statements that the required timeline for the TOU Order, which requires Evergy  
5 to start our education campaign before the 10-month lead in time and does not require  
6 Evergy to be fully completed with our campaign by the time the transition started. Even if  
7 it did, Staff still filed its Complaint before the October transition date, uses data taken  
8 before October and months before the deadline to move all customers over to TOU rates.  
9 As shared earlier, our campaign timeline was provided to Staff, OPC, and the Commission  
10 and never once did any party even suggest that Evergy should finish its campaign and finish  
11 communicating before customers even got their first TOU bill. Our TOU campaign takes  
12 customers through a full year of education, which we believe is needed when moving  
13 customers to rates that are both very different than what customers are used to and for rates  
14 that have major impacts during different seasons.

15 **Q: On page 5 of her direct testimony, Ms. Fontaine criticizes the Company's use of**  
16 **phrases like "mandatory", "mandated" and "required" in your communications with**  
17 **the public which were "fear-based" and led to alarm and confusion. Do you have any**  
18 **comments?**

19 **A:** Yes, thank you for the opportunity to touch on this subject in more detail, as I've truly been  
20 surprised at the questioning of the use of the word mandatory from Staff, OPC and others.  
21 Moving to default TOU rates has been referred to as "Mandatory TOU" rates by all parties,  
22 Staff, OPC and the Commission since we started debating this issue during the 2022 Evergy  
23 Missouri rate case, and likely even before that. In the *List of Issues, Order of Witnesses,*

1 *Order of Cross-Examination and Order of Opening Statements* submitted by Staff in Case  
2 ER-2022-0130, Staff and all parties called this issue “Should the Staff’s proposed Time of  
3 Use rate schedules be implemented on a mandatory basis?” (Item XVIII. Rate Design/Class  
4 Cost of Service, Issue G).

5 Furthermore, when discussing the issues during their November 8, 2022, agenda  
6 meeting, the Commission also referred to this Order as “mandatory TOU rates”, including  
7 during these discussions:

8 Chairman Silvey: “...first I want to look at G and F. Should the  
9 Staff’s proposed rate schedules be implemented on a mandatory  
10 basis...”

11 Commissioner Rupp: “I’ve been a fan of mandatory time of use  
12 rollout for years.” “...and do making it mandatory with the six  
13 months...” “...just going to the opt out with mandatory side is what  
14 incentivizing the behavior...”

15 Commissioner Holsman: “I’m not opposed to mandating when  
16 mandating is the option that is necessary...” “So I would be more  
17 inclined to support the company continuing to do a non-mandated  
18 but aggressive timeline...” “....for those reasons, I’m not opposed  
19 to mandating....”

20 Staff also used the phrase in their own FAQ document used on the Commission  
21 website and filed in case EW-2023-0199 to help customers with questions about the change  
22 to TOU rates. Staff’s document states: “Some have time-based rate plans as options, some  
23 as mandatory plans, and some use a time-based demand charge to set customer monthly  
24 bills.” Staff used Mandatory in the same way Evergy used mandatory, to help distinguish  
25 between options TOU rates and ones that are not optional.

26 The Office of Public Counsel also uses mandatory TOU rates when referring to  
27 Evergy’s new rate order in their “Motion to Suspend Hearing” filing in Case No. ET-2024-  
28 0061 when they say: “Evergy’s belated request to change the tariff sheets to implement its

1 TOU rates, which was made a mere twenty-three days before the TOU rates are to be  
2 implemented and eight months after the Commission issued its Amended Report and Order  
3 **ordering the use of mandatory TOU rates**, should not constitute a reason to infringe  
4 upon parties' due process rights." And also, when they say "Finally, as the Commission is  
5 well aware, the Company continues to reject mandatory TOU rates despite having the  
6 technology in place for more than eight years now." (Surrebuttal Testimony of Geoff  
7 Marke, page 31, line 25 in ER-2022-0130)

8 As you can see, this issue had been referred to as Mandatory TOU rates by all  
9 parties for a number of years but is only recently being challenged when Evergy used the  
10 term as coming off as "alarmist". I don't believe the Commission, Staff or OPC were being  
11 "alarmist" in their use of the word to reference this change, and neither was Evergy. Also,  
12 Staff suggests that Evergy was not clear in our messaging, and I can't think of anything  
13 that was more clear and helpful in letting customers know that an important change was  
14 coming, and they needed to pay attention.

15 In addition, Ms. Fontaine points out the success of Evergy's TOU pilot (Fontaine.  
16 Page 7. Line 6), where Evergy was successful in informing customers that the Company  
17 had optional TOU rates at that time. Since customers were aware of our past campaign and  
18 optional TOU rate, as Ms. Fontaine suggests, it was important that customers understood  
19 that the time-based rate plans were no longer optional. It was important to customer  
20 understanding that they knew that the new TOU plans were now required and that they  
21 would need to select a TOU plan or Evergy would be moving them to a TOU plan.

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

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



Based upon a review of the videos from the relevant Agenda Meetings and On-the-Record presentations in EW-2023-0199, below are Commissioner comments transcribed from the videos.

### **August 10, 2023—Agenda Meeting**

Rupp: “Your website is very nice.” 1:54:33<sup>1</sup>

Rupp: “You are going to have the most educated customers for a utility in the country.” 2:03:18

Rupp: “Thank you for your time and for the detailed presentation. Greatly appreciated. This was excellent data and look forward to the data.” 2:04

Holsman: “Thank you, wonderful.” 2:04

### **November 28, 2023—On-the-Record Presentation**

Kolkmeier: “Chuck and Katie, thank you for your presentation. It was very informational.” 1:05

Rupp: “I don’t have any questions. I have asked my questions. But I do have some comments. I appreciate this data. There is a lot of hyperbole—a lot of stuff was out in the media, and stuff, and we are starting to see the real numbers, we are beyond projections, we are beyond speculations, and the numbers are coming in. Very pleased with the numbers. 155,000 people went in and made a proactive choice what they believed was the best.

You are growing your digital engagement, you are having a better educated, a more informed consumer and I think you are right Chuck when you said six months from now a lot of this will not even be in issue. They are going to settle into the new rate and I think it will be fascinating to watch this as it moves forward, and I appreciate your anecdote about the change when you do energy efficiency and what you saw there, and what we are seeing there, and I hope as we continue to move down and get this data, people are going to continue to educate themselves. I think it’s great that you are going to peel back on the mass media and go much more to the direct engagement with the customer. I think you get a lot less blow back, a lot less ancillary things, and even the stuff we were seeing here with the mass media and a lot of the communication and the complaints we were getting were from non-Evergy customers. It wasn’t even their area, and in some of that, so they didn’t have access to the information. But it’s really looking like when people have access to the information they are making choices that they believe are the best for their family, and whether or not that choice changes or migrates that is to be seen, but I think the data you are collecting is exactly what we were looking for, so I commend you on that. I know this is a data rich, this is a gold mine for utilities across the country so the more you are open with the data to share with other utilities on your experience, so that they can glean that the

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<sup>1</sup> The time refers to the time on the video of the presentation.

experts thought that we were looking at one, maybe a high of 3%, and you are at 30% in a short period of time, I think it is going to change the bar of the conversation nationwide, and I think Everygy will be the leader in that space. You will be able to provide real data to other organizations that can help them choose what they believe is best for their customers, I appreciate the data, I appreciate your openness, keep it coming, so we can actually see how this is working as the rubber hits the road.” 1:06 - 1:09

### **January 22, 2024—On-the-Record Presentation (virtual)**

Rupp: “Yeah, I will thank the Company for the amount of data that you have been sharing. It has been extremely insightful and very helpful for all the parties to see as we’ve gone through this process.

So your willingness (“we kinda made you”) but you are doing it with a smile which is nice, but sharing that information we see these trends and flesh out what’s actually happening versus the boogeyman around the corner or overly hopeful projections and stuff, the data is very insightful and it’s helpful...

I firmly believe that these have been extremely helpful for the Commission and so I look forward to the next one in April. . . “

1:47:49

Kolkmeier: “I thank everyone and second the Chairman’s comments and thank the Company for bringing this information forward. It has been very helpful. Thank you.”

1:49

### **April 2, 2024—On-the-Record Presentation**

Rupp: “You guys are doing a very good job of getting customer awareness out there. What have you found is the most effective tool from going awareness to action?”

1:02

Kolkmeier: “I just want to commend the Company for this presentation. I was kind of vocal last time we weren’t getting any new information. So I want to thank the Company for bringing some new information. So thank you very much.”

1:20



# Education and Awareness Strategy

**Strategy Overview:** Use a phased approach, that incorporates both mass awareness and direct marketing tactics, to move a customer from awareness to action and then finally to transition and success.

Campaign Phase	Objective	Message Idea	Tactic Type
<b>Phase 1</b> <b>Awareness &amp; Education</b> June 15 <sup>th</sup> – Nov. 30 <sup>th</sup> , 2023	Inform customers that Missouri is changing rate structures soon and educate them on how TOU rates work.	Missouri will be changing electric rate structures starting this Fall. Learn how to prepare.	Mass Awareness
<b>Phase 2</b> <b>Action &amp; Preparation</b> Aug. 1 <sup>st</sup> – Nov. 30 <sup>th</sup> , 2023	Prepare customers for the upcoming change, inform them of their rate options & how they work, and encourage pre-selection of a rate.	As Missouri moves to TOU rates, Everygy is offering new personal power plans. Learn about your plan options and select a plan before October.	Mass Awareness and Direct
<b>Phase 3</b> <b>Transition &amp; Coaching</b> Oct. 1 <sup>st</sup> – Dec. 31 <sup>st</sup> , 2023	Ensure customers know they will be defaulted into a new rate and provide coaching to help them be successful on the new plan.	Your rate will change on X date. We are here to support your transition to TOU.	Direct
<b>Phase 4</b> <b>Success &amp; Coaching</b> Jan. 1 <sup>st</sup> – April 30 <sup>th</sup> , 2024	Help customers understand how their rate works and encourage shifting usage to off-peak times.	Your new rate allows you to save money by shifting to off-peak times. Here are tips and tricks to help you save.	Direct
<b>Phase 5</b> <b>Summer Prep &amp; Coaching</b> May 1 <sup>st</sup> – Sept. 30 <sup>th</sup> , 2024	Prepare customers for the change in summer pricing and provide tools, tips, and resources to avoid summer peak usage.	Prices change in the summer, start preparing your home and family to avoid high usage during the summer.	Mass Awareness and Direct





# Campaign Phases

Mid-June	July	Aug.	Sept.	Oct	Nov.	Dec.
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Phase 1: Awareness & Education		Phase 2: Action & Preparation		Phase 3: Transition & Coaching	
June 15 <sup>th</sup> – Nov. 30 <sup>th</sup>		Aug. 1 <sup>st</sup> – Nov. 30 <sup>th</sup>		Oct. 1 <sup>st</sup> – Dec. 31 <sup>st</sup>	
<p><b>Phase Objective</b></p> <p>Inform customers that Missouri is changing rate structures soon and educate them on how TOU rates work.</p> <hr/> <p><b>Main Message Idea</b></p> <p>Missouri will be changing electric rate structures starting this Fall. Learn how to prepare.</p> <hr/> <p><b>Tactics</b></p> <p>Out-of-Home, Social, Digital Display, Email, Bill Inserts/Message, Website, Media Relations, Search</p> <hr/> <p><b>Creative Approach</b></p> <p>Text over branded background. CTA: Learn more at evergy.com</p>		<p><b>Phase Objective</b></p> <p>Prepare customers for the upcoming change, inform them of their rate options &amp; how they work, and encourage pre-selection of a rate.</p> <hr/> <p><b>Main Message Idea</b></p> <p>As Missouri moves to TOU rates, Evergy is offering new personal power plans. Learn about your options &amp; select a plan before Oct.</p> <hr/> <p><b>Tactics</b></p> <p>Out-of-Home, Radio, Digital Display, Search, Social, Media Relations, Rate Education Reports, Direct Mail, Community Events &amp; Special Group* 1:1 Support, Website</p> <hr/> <p><b>Creative Approach</b></p> <p>Addition of lifestyle images and rate plan creative. CTA: select your rate now.</p>		<p><b>Phase Objective</b></p> <p>Ensure customers know they will be defaulted into a new rate and provide coaching to help them be successful on the new plan.</p> <hr/> <p><b>Main Message Idea</b></p> <p>Your rate will change on X date. We are here to support your transition to TOU.</p> <hr/> <p><b>Tactics</b></p> <p>Direct Mail, Email, Energy Coach Emails and Weekly Reports, Community Events &amp; Special Group* 1:1 Support</p> <hr/> <p><b>Creative Approach</b></p> <p>Energy Coach and detailed plan information.</p>	

Q1 2024	Q2 2024	Q3 2024	Q4 2024
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Phase 4: Success & Coaching		Phase 5: Summer Prep & Coaching	
Jan. 1 <sup>st</sup> – April 30 <sup>th</sup> , 2024		May 1 <sup>st</sup> – Sept. 30 <sup>th</sup> , 2024	
<p><b>Phase Objective</b></p> <p>Help customers understand how their rate works and encourage shifting usage to off-peak times.</p> <hr/> <p><b>Main Message Idea</b></p> <p>Your new rate allows you to save money by shifting to off-peak times. Here are tips and tricks to help you save.</p> <hr/> <p><b>Tactics</b></p> <p>Email, Direct Mail, Bill Inserts, Search, Digital, Energy Coach Emails, Rate Education Report, Special Group* 1:1 Support</p>		<p><b>Phase Objective</b></p> <p>Prepare customers for the change in summer pricing and provide tools, tips, and resources to avoid summer peak usage.</p> <hr/> <p><b>Main Message Idea</b></p> <p>Prices change in the summer, start preparing your home and family to avoid high usage during the summer peak.</p> <hr/> <p><b>Tactics</b></p> <p>Out-of-Home, Radio, Social, Email, Bill inserts, Direct Mail, Special Group* 1:1 Support</p>	

\* Includes income-eligible, seniors, electric-heat customers



# 2023 Tactics and Audience Summary

Channel	General Audience	Low Income	Seniors	Hard-to-Reach			Electric Heat Customers	Net-Meter Customers
				Rural	Non-Digital	Less Energy Engaged		
<b>Paid</b>								
<b>Out-of-Home</b>								
Traditional Billboards	X							
Posters	X	X		X	X	X		
<b>Print</b>								
Newspapers	X			X	X			
Church Bulletins	X		X	X	X			
<b>Audio</b>								
Non-Metro Radio	X		X	X	X			
Streaming Audio	X	X				X		
<b>Digital &amp; Social</b>								
Programmatic Display	X	X				X		
High Impact Display	X	X				X		
Digital Video	X	X				X		
Social Video	X			X		X		
Social Image	X			X		X		
Paid Search	X	X		X		X		
<b>Earned</b>								
Media Outreach	x		x	x	x	x		
Community Events	x	x	x	x	x	x		
Connect Center	x	x	x		x			
<b>Shared</b>								
Video	x	x						
Organic Social	x			x				
<b>Owned</b>								
Email	x	x		x			x	x
Website	x	x						x
Rate Education Reports	x			x	x	x	x	
Direct Mail	x	x	x	x	x		x	x
Bill Message and Inserts	x	x		x	x			