

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

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

STAFF’S STATEMENT OF POSITIONS

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”),
by and through counsel, on its own behalf, and respectfully submits its
Statement of Positions:

Conflicting Issues Lists

1. The Commission in its Order Approving Four Partial Stipulations and Agreements in Case Nos. ER-2022-0129 and ER-2022-0130 (“Stipulation Order”), effective October 2, 2022, approved the Stipulation and Agreement dated August 30, 2022; which included a provision at page 12 in which Evergy Missouri Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc., d/b/a Evergy Missouri West (“Evergy Missouri West”), collectively “Evergy,” committed as follows:

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

2. As the Commission is aware, conflicting issues lists were filed by the parties on January 17, 2024. The reason for this is essentially two-fold. First, the Evergy and MEGG framework fails to account for the specificity of the stipulation provision that

“the Company will provide the reason why it cannot provide the requested data and *its individual estimate of the cost to provide each set of requested data;*” and second, that Evergy’s issue list seeks to introduce at least one, if not two, issues that are not properly before the Commission in this case. Evergy issue #4 relies on improper surrebuttal testimony provided by Mr. Lutz, which should be stricken (see Staff’s *Motion to Strike*).

Staff’s Position Statements

1. What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to provide line transformer costs and expenses by rate code?

Staff position: Evergy failed to provide an estimate of the cost to provide line transformer costs and expenses by rate code. Evergy should be directed to provide responses to Staff data requests 10, 81, 12, 83, 13, 84, 14, and 85. Evergy’s responses to these and any subsequent related data requests should be filed in this docket for public and Commission inspection consistent with Staff’s recommendation that “this docket be used as a means to resolve areas where Evergy asserts that it cannot provide requested data because production of this data would require Evergy to perform additional analysis. Some analysis of distribution system costs must occur at some point.”¹

a. Should the Commission order production of line transformer costs and expenses by rate code as described in Stipulation provision 1 at that estimated cost?

Staff position: Evergy failed to provide an estimate of the cost to provide line transformer costs and expenses by rate code. It would be imprudent

¹ Lange rebuttal, page 18.

for Evergy to expend the lump-sum estimate provided in attachment BDL-1 HC.

2. What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to provide primary distribution costs and expenses by voltage?

Staff position: Evergy failed to provide an estimate of the cost to provide primary distribution system costs and expenses by rate code. Evergy should be directed to provide responses to Staff data requests 10, 81, 18, 89, 19, 90, 30, 101, 31, 102, 34, 105, 35, 106, 38, 109, 39, 110, 40, 111, 43, 114, 44, 115, 48, 119, 49, 120, 52, 123, 53, and 124. Evergy’s responses to these and any subsequent related data requests should be filed in this docket for public and Commission inspection consistent with Staff’s recommendation that “this docket be used as a means to resolve areas where Evergy asserts that it cannot provide requested data because production of this data would require Evergy to perform additional analysis. Some analysis of distribution system costs must occur at some point.”²

a. Should the Commission order production of primary distribution costs and expenses by voltage as described in Stipulation provision 1 at that estimated cost?

Staff position: Evergy failed to provide an estimate of the cost to provide primary distribution costs and expenses by voltage. It would be imprudent for Evergy to expend the lump-sum estimate provided in attachment BDL-1 HC.

3. What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to provide secondary distribution costs and expenses by voltage?

² Lange rebuttal, page 18.

Staff position: Evergy failed to provide an estimate of the cost to provide secondary distribution system costs and expenses by rate code. Evergy should be directed to provide responses to Staff data requests 10, 81, 18, 89, 19, 90, 30, 101, 31, 102, 34, 105, 35, 106, 38, 109, 39, 110, 40, 111, 43, 114, 44, 115, 48, 119, 49, 120, 52, 123, 53, and 124. Evergy's responses to these and any subsequent related data requests should be filed in this docket for public and Commission inspection consistent with Staff's recommendation that "this docket be used as a means to resolve areas where Evergy asserts that it cannot provide requested data because production of this data would require Evergy to perform additional analysis. Some analysis of distribution system costs must occur at some point."

a. Should the Commission order production of secondary distribution costs and expenses by voltage as described in Stipulation provision 1 at that estimated cost?

Staff position: Evergy failed to provide an estimate of the cost to provide secondary distribution costs and expenses by voltage. It would be imprudent for Evergy to expend the lump-sum estimate provided in attachment BDL-1 HC.

4. What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide primary voltage service drop costs and expenses?

Staff position: Evergy failed to provide an estimate of the cost to provide primary voltage service drop costs and expenses by rate code. Evergy should be directed to provide responses to Staff data requests 56 and 127. Evergy's responses to these and any subsequent related data requests should be filed in this docket for public and Commission inspection consistent with Staff's recommendation that "this docket be used

as a means to resolve areas where Evergy asserts that it cannot provide requested data because production of this data would require Evergy to perform additional analysis. Some analysis of distribution system costs must occur at some point.”³

a. Should the Commission order production of primary voltage service drop costs and expenses as described in Stipulation provision 1 at that estimated cost?

Staff position: Evergy failed to provide an estimate of the cost to provide voltage service drop costs and expenses by voltage. It would be imprudent for Evergy to expend the lump-sum estimate provided in attachment BDL-1 HC.

5. What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to provide line extension costs, expenses, and contributions by rate code and voltage?

Staff position: Evergy failed to provide an estimate of the cost to provide line extension costs, expenses, and contributions by rate code and voltage. Evergy should be directed to provide responses to Staff data requests 28, 99, 55, 126, 57, and 128. Evergy’s responses to these and any subsequent related data requests should be filed in this docket for public and Commission inspection consistent with Staff’s recommendation that “this docket be used as a means to resolve areas where Evergy asserts that it cannot provide requested data because production of this data would require Evergy to perform additional analysis. Some analysis of distribution system costs must occur at some point.”⁴

a. Should the Commission order production of line extension costs, expenses, and contributions by rate code and voltage as described in Stipulation provision 1 at that estimated cost?

³ Lange rebuttal, page 18.

⁴ Lange rebuttal, page 18.

Staff position: Evergy failed to provide an estimate of the cost to provide line extension costs, expenses, and contributions by rate code and voltage. It would be imprudent for Evergy to expend the lump-sum estimate provided in attachment BDL-1 HC.

6. What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to provide meter costs by voltage and rate code?

Staff position: Evergy failed to provide an estimate of the cost to provide meter costs by voltage and rate code. Evergy should be directed to provide responses to Staff data requests 60, 131, 61, 132, 64, 135, 65, 136, 66, and 137. Evergy’s responses to these and any subsequent related data requests should be filed in this docket for public and Commission inspection consistent with Staff’s recommendation that “this docket be used as a means to resolve areas where Evergy asserts that it cannot provide requested data because production of this data would require Evergy to perform additional analysis. Some analysis of distribution system costs must occur at some point.”⁵

a. Should the Commission order production of meter costs by voltage and rate code as described in Stipulation provision 1 at that estimated cost?

Staff position: Evergy failed to provide an estimate of the cost to provide line extension costs, expenses, and contributions by rate code and voltage. It would be imprudent for Evergy to expend the lump-sum estimate provided in attachment BDL-1 HC.

7. What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to provide for each rate code, provide the total number of customers served on that rate schedule on the first day of the month and the last day of the month?

⁵ Lange rebuttal, page 18.

Staff position: Evergy's evidence, presented in attachment BDL-1 HC is that a ** [REDACTED] ** would need to be expended in addition to Evergy's existing investment in billing systems, data hubs and AMI metering, in order to provide the total number of customers served on each rate code on the first day of the month and the last day of the month. It is not clear whether or not this amount is inclusive of, or in addition to, amounts included for provision of other customer and usage information. Also, Mr. Lutz surrebuttal testimony in EO-2024-0002 at page 18 in pertinent part references the indicated Staff testimony, and states, "If usable hourly customer usage information by rate code can be provided at the lower end of this range through use of sub-rate codes, Staff recommends the Commission direct Evergy to proceed with the provision of that information, along with the customer count information.' In order to achieve the "lower end of the range" it will be necessary for Staff to accept data more in line with Company billing precision and level of rate code detail. Similar to the response to the Kim Cox recommendation, the Company is willing to further explore provision of hourly customer usage information under applicable filings before the Commission."

Staff has requested (in DR 201) that Evergy provide 1. a specimen workpaper for each utility (Evergy Missouri Metro and Evergy Missouri West) showing the form of "Company billing precision and level of rate code detail," referenced in this testimony, and 2. That Evergy clarify whether it is Evergy's intent with this testimony that the referenced data be (a) provided for a test period that occurred prior to the start of a case, (b) provided for a test period that occurred prior to the start of a case AND provided for an update period of the Staff's choosing for some 12-13 month period ending after the date of the company's

direct filing but before the date of the Staff's direct filing, (c) provided for a test period that occurred prior to the start of a case AND provided for an update period of the Staff's choosing for some 12-13 month period ending after the date of the company's direct filing but before the date of the Staff's direct filing, AND provided for review of a period ending on or about the date of any true-up?

Staff also inquired as to the extent of Evergy's caveat found in Mr. Lutz surrebuttal testimony in EO-2024-0002 at page 18 which in pertinent part states, "To begin, Staff witness Kim Cox recommends that "the Commission order Evergy to have the discussions with Staff that Ms. Dragoo suggests in her direct testimony and to order Evergy to provide the data requested in 2, 3, and 4, which Evergy states is more reasonable and should only be provided with support from the Commission. To the extent that Evergy is unable to retrieve this information after a day, month, or billing cycle has passed, Evergy should retain that information so that it is available for use in future general rate cases." The Company is willing to join these discussions and retain the data as suggested by Staff, but requests that the Commission provide guidance concerning the intended timing of the provision. The Company supports this data exchange being part of a general rate proceeding, but is not willing to commit to ongoing work outside of a formal proceeding unless the Commission requires it. The Company should not be obligated to provide this data frequently or ad hoc, outside of a general rate proceeding." Staff requested that Evergy 1. elaborate on what is meant by "being part of a general rate proceeding," in particular please state whether "being part of a general rate proceeding," and 2. confirm whether Evergy will "support this data exchange," for use in MEEIA filings, IRP filings, or studies of time-based rates in any proceeding.

Further, Mr. Lutz surrebuttal testimony in EO-2024-0002 at page 8 states, “Q: You mention the Company’s intention to file a rate case for Evergy Missouri West. Would the TOU transition be reflected in that filing? A: Residential Customers on TOU rates will be included but will be of minimal impact and will not result in significant change in the Company supporting documentation. Only a few hundred Residential customers self-selected the TOU rates and were billed within the expected test year period.” Staff DR 195 requested that Evergy answer 1. What is the expected test period Evergy will propose for the Evergy Missouri West rate case referenced by Mr. Lutz at page 8 of his surrebuttal testimony in EO-2024-0002? 2. Please describe the level at which responsiveness to weather will be studied in Evergy Missouri West’s direct filing in the Evergy Missouri West rate case referenced by Mr. Lutz at page 8 of his surrebuttal testimony in EO-2024-0002. Specifically state whether Evergy Missouri West’s direct filing in the Evergy Missouri West rate case referenced by Mr. Lutz at page 8 of his surrebuttal testimony in EO-2024-0002 will (a) rely on a calculation of weather-responsiveness by rate code such as RPKA versus RTOU2, or will Evergy Missouri West’s direct filing in the Evergy Missouri West rate case referenced by Mr. Lutz at page 8 of his surrebuttal testimony in EO-2024-0002 rely on (b) a calculation of weather-responsiveness by rate class, such as “Residential”? 3. Please provide a pro-forma workpaper of the study of weather responsiveness expected to be relied upon in the referenced rate case filing. If this pro-forma workpaper is expected to be substantially similar to the workpapers relied upon in ER-2022-0130, please so state and provide that workpaper with formulas intact. 4. For the Evergy Missouri West rate case referenced by Mr. Lutz at page 8 of his surrebuttal testimony in EO-2024-0002, assume 20 customers

are served on the Residential Other Use rate schedule in the month of June 2023. Assume 0 customers are served on the Residential Other Use rate schedule in the month of December 2023. If Evergy provides customer billing data to Staff in March of 2024 for the 12 months ending December 31, 2023, will the customer count for the Residential Other Use rate schedule for the month of June 2023 be 20, 0, or some other number. Additional details related to the timing of customer and usage data availability were requested in Staff DRs 196 and 197. Staff DRs 195 – 213 are attached as ATTACHMENT 3. Responses to these data requests, and potential follow-up discovery will be necessary for Staff to evaluate the cost Evergy estimates to provide customer and usage data, and the usefulness of the data to be provided.

a. Should the Commission order production of the total number of customers served on each rate schedule, for each rate code, on the first day of the month and the last day of the month as described in Stipulation provision 2 at that estimated cost?

Staff position: Assuming that Evergy’s responses to Staff DRs 195 – 213 indicate that Evergy can timely provide usable customer and usage information at a reasonable cost, at a rate code level, then “Staff recommends that the Commission order Evergy ensure access to actual hourly customer load data by rate code and ensure access to accurate customer counts by rate code. This access must be provided in a timely manner to avoid months of regulatory lag when processing rate cases.”⁶

8. Customer counts

a. Total customer counts: What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to provide for each rate schedule on which customers may take service at various voltages, the

⁶ Luebbert Rebuttal at page 4.

number of customers served at each voltage on the first day of the month and the last day of the month?

i. Should the Commission order production, for each rate schedule on which customers may take service at various voltages of the number of customers served at each voltage on the first day of the month and the last day of the month as described in Stipulation provision 2a at that estimated cost?

b. Counts of AMI metered customers: What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide for each rate code, the number of customers served on that rate schedule on the first day of the month and the last day of the month for which interval meter readings are obtained?

i. Should the Commission order production of the number of customers served on each rate schedule, by rate code, on the first day of the month and the last day of the month for which interval meter readings are obtained as described in Stipulation provision 3 at that estimated cost?

c. Counts of AMI metered customers by voltage: What is Evergy Missouri Metro's and Evergy Missouri West's estimate of the cost to provide for each rate code on which customers may take service at various voltages, the number of customers served at each voltage on the first day of the month and the last day of the month for which interval meter readings are obtained?

i. Should the Commission order, for each rate code on which customers may take service at various voltages, production of the number of customers served at each voltage on the first day of the month and the last day of the month for which interval meter readings are obtained as described in Stipulation provision 3a at that estimated cost?

Staff position: As stated in Staff's position on Issue 7, it is unclear the extent to which Evergy's estimated costs for Stipulation provisions 2a, 3, and 3a, are included in Evergy's estimated costs for Stipulation provision 2. Staff lists these items in Issue 8 as separate issues for Commission resolution in the event that Evergy requires an additional ** [REDACTED] ** to comply with each of these Stipulation provisions.

9. Customer hourly usage

- a. What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to provide for each rate code for which service is available at a single voltage, the sum of customers’ interval meter readings, by interval?**

Staff position: Evergy’s evidence, presented in attachment BDL-1 HC is that a ** [REDACTED] ** would need to be expended in addition to Evergy’s existing investment in billing systems, data hubs and AMI metering, in order to provide the total number of customers served on each rate code on the first day of the month and the last day of the month. It is not clear whether or not this amount is inclusive of, or in addition to, amounts included for provision of other customer and usage information. Staff DRs 195 – 213 are attached as ATTACHMENT 3. Given the caveats noted in Staff’s position on Issue 7, responses to these data requests, and potential follow-up discovery will be necessary for Staff to evaluate the cost Evergy estimates to provide customer and usage data, and the usefulness of the data to be provided.

- i. Should the Commission order production for each rate code for which service is available at a single voltage, the sum of customers’ interval meter readings, by interval as described in Stipulation provision 4 at that estimated cost?**

Staff position: Assuming that Evergy’s responses to Staff DRs 195 – 213 indicate that Evergy can timely provide usable customer and usage information at a reasonable cost, at a rate code level, then “Staff recommends that the Commission order Evergy ensure access to actual hourly customer load data by rate code and ensure access to accurate customer counts by rate code. This access must be provided in a timely manner to avoid months of regulatory lag when processing rate cases.”⁷

⁷ Luebbert Rebuttal at page 4.

- b. **What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to provide for each rate code on which customers may take service at various voltages, the sum of customers’ interval meter readings, by interval and by voltage?**
 - i. **Should the Commission order, for each rate code on which customers may take service at various voltages, production of the sum of customers’ interval meter readings, by interval and by voltage; as described in Stipulation provision 4a at that estimated cost?**

- c. **What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to provide if any internal adjustments to customer interval data are necessary for the company’s billing system to bill the interval data referenced in parts 4. and 4.a., such adjustments should be applied to each interval recording prior to the customers’ data being summed for each interval?**
 - i. **Should the Commission order production of any applicable internal adjustments to customer interval data as necessary for the company’s billing system to bill the interval data referenced in parts 4. and 4.a., if not internally applied; as described in Stipulation provision 5 at that estimated cost?**

Staff position: As stated in Staff’s position on Issue 9a, it is unclear the extent to which Evergy’s estimated costs for Stipulation provisions 4.a. and 5 are included in Evergy’s estimated costs for Stipulation provision 2. Staff lists these items as separate issues for Commission resolution in the event that Evergy requires an additional
** [REDACTED] ** to comply with each of these Stipulation provisions.

- 10. **What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to provide information the Commission may designate from time to time pertaining to certain customer subsets for more granular study?**

Staff position: Evergy failed to provide an estimated cost.

- a. **Should the Commission order Evergy Missouri Metro’s and Evergy Missouri West’s to take steps to facilitate such production of information as described in Stipulation provision 6 at that estimated cost?**

Staff position: Evergy failed to provide an estimated cost. Mr. Lutz surrebuttal testimony in EO-2024-0002 at page 26 in pertinent part states “For Data Request #6, affirm that this is a prospective request and cannot be appropriately assessed at this time.” Staff has submitted DR 7, requesting that Evergy “1. Please confirm that this testimony refers to Evergy’s commitments related to “From time to time the Commission may designate certain customer subsets for more granular study. If such designations have been made, the information required under parts 1 – 5 should be provided or retained for those instances.” 2. Please clarify whether Evergy has mechanisms in place to quickly aggregate information upon requests, such as if the Commission request study of billing characteristics by zip code; or billing characteristics by customers receiving LIHEAP; or billing characteristics by customers receiving EDRs or EDIs?” Response to this data request is necessary to provide Staff’s position on this issue.

- 11. What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to retain individual customer interval data for a minimum of 14 months where individual data is acquired by the Company in intervals of less than one hour in duration, such data shall be retained in intervals of no less than one hour?**

Staff position: Evergy states that there is ** [REDACTED] ** associated with this commitment beyond existing investment in billing systems, AMI metering, and the “Data Hub.”

- a. Should the Commission order such retention as described in Stipulation provision 7 at that estimated cost?**

Staff position: Yes.

- 12. What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to retain individual hourly data for use in providing bill-comparison tools for customers to compare rate alternatives?**

Staff position: Evergy states that there is **** [REDACTED] **** associated with this commitment beyond existing investment in billing systems, AMI metering, and the “Data Hub.”

a. Should the Commission order such retention of individual hourly data for use in providing bill-comparison tools for customers to compare rate alternatives as described in Stipulation provision 8a at that estimated cost?

Staff position: Yes.

13. What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to retain coincident peak determinants for use in future rate proceedings?

Staff position: Evergy failed to provide an estimated cost.

a. Should the Commission order Evergy Missouri Metro and Evergy Missouri West to retain information to provide coincident peak determinants for use in future rate proceedings as described in Stipulation provision 8b at that estimated cost?

Staff position: The Commission should order that Evergy produce 15 minute on-peak period demand determinants by rate code for non-residential rate schedules. Staff, Evergy, and the signatories to the 2022 Stipulation and Agreement should be ordered to define up to five sets of on-peak demand periods for this study.⁸ Mr. Lutz surrebuttal testimony in EO-2024-0002 at pages 20-21 in pertinent part references the indicated Staff testimony and states, “The Commission should order that Evergy produce 15 minute on-peak period demand determinants by rate code for non-residential rate schedules. Staff, Evergy, and the signatories to the 2022 Stipulation and Agreement should be ordered to define up to five sets of on-peak demand periods for this study.’ The Commission should reject this recommendation. The Company does not bill customers with this level

⁸ Lange Rebuttal, page 19.

of detail and while this data does exist in the Evergy Meter Data Management, it is not stored in a format that allows for summation of the 15-minute intervals.” Staff has requested in DR 204 that Evergy “1. Please provide a sample of the 15 minute billing data for the months of June 2023-October 2023 for 100 Evergy Missouri Metro customers taking service rate codes MGS, LGS, LPS, LPS-1, SGA, MGA, and LGS (100 total customers, not 100 customers per rate code) to facilitate initial study of the relationship between 15 minute demand and hourly demand of Evergy Missouri Metro non-residential customers. Include the customer’s rate code and an identification number, but no other customer-identifiable information.

2. Please provide a sample of the 15 minute billing data for the months of June 2023-October 2023 for 100 Evergy Missouri West customers taking service rate codes MOLGS, MOLNS, MOLGP, MOLNP, MOPGS, MOPNS, MOPGP, MOPNP, MOPSU, and MOPTR (100 total customers, not 100 customers per rate code) to facilitate initial study of the relationship between 15 minute demand and hourly demand of Evergy Missouri Metro non-residential customers. Include the customer’s rate code and an identification number, but no other customer-identifiable information.” Staff has also sought clarification regarding existing demand charges in DRs 202 and 203.

- 14. What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to provide to Staff, upon request, the information described in part 1, related to distribution costs and expenses?**
- a. Should the Commission order production to Staff upon request of the distribution data described in Stipulation provision 1, as described in Stipulation provision 8c1 at that estimated cost?**

Staff position: See Staff positions on Issues 1 – 6a.

15. What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to provide to Staff upon request a minimum of 12 months of the data described in parts 2-5 (customer counts and interval usage by rate code)?
- a. Should the Commission order production to Staff upon request a minimum of 12 months of the data described in parts 2-5 (customer counts and interval usage by rate code) as described in Stipulation provision 8c2 at that estimated cost?

Staff position: See Staff positions on Issues 7 – 9.c.i..

16. What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to provide to Staff upon request for rate codes with more than 100 customers, a sample of individual customer hourly data, and identified peak demands for those 100 customers in the form requested at that time (i.e. monthly 15 minute non-coincident, annual 1 hour coincident)?
- a. Should the Commission order production to Staff upon request such information as described in Stipulation provision 8c3 at that estimated cost?

Staff position: See Staff position for Issue 17.

17. What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to provide to Staff upon request for rate codes with 100 or fewer customers, individual customer hourly data, and identified peak demands for those customers in the form requested at that time (i.e. monthly 15 minute non-coincident, annual 1 hour coincident)?
- a. Should the Commission order production to Staff upon request such information as described in Stipulation provision 8c4 at that estimated cost?

Staff position: Evergy failed to provide an estimate for any interval other than **** [REDACTED] **** and appears to have limited its response to provision of **** [REDACTED] ****. Nonetheless, Evergy estimates that additional expenditures of **** [REDACTED] **** in addition to existing investment and expenses associated with billing systems, AMI metering, and the “Data Hub,” and planned Evergy activities. This is concerning to Staff in that it appears that Evergy does not intend to sample customer data to review customer impacts of its rate design and rate structure proposals, such as the “Bright Lines,” discussed by Mr. Lutz.

18. **What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to provide for purposes of general rate proceedings, all data described above for a period of not less than 36 months, except that Staff does not request individual customer data for 36 months except as described in part 8.c.3.?**

a. **Should the Commission order production, for purposes of general rate proceedings, of all data described above for a period of not less than 36 months, except that Staff does not request individual customer data for 36 months except as described in part 8.c.3. as described in Stipulation provision 8d at that estimated cost?**

Staff position: See Staff positions described above, noting in particular Staff’s requested clarification concerning the frequency and timeliness of data provision.

19. **What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost to provide and develop the determinants for assessment of an on-peak demand charge to replace the current monthly billing demand charge, and for potential implementation for customers not currently subject to a demand charge?**

Staff position: Evergy failed to provide an estimated cost.

a. **Should the Commission order Evergy Missouri Metro and Evergy Missouri West to retain information to provide coincident peak determinants for use in future rate proceedings as described in Stipulation provision 8b at that estimated cost?**

Staff position: The Commission should order that Evergy produce 15 minute on-peak period demand determinants by rate code for non-residential rate schedules.

Staff, Evergy, and the signatories to the 2022 Stipulation and Agreement should be ordered to define up to five sets of on-peak demand periods for this study.⁹

Mr. Lutz surrebuttal testimony in EO-2024-0002 at pages 20-21 in pertinent part references the indicated Staff testimony and states, “The Commission should order that Evergy produce 15 minute on-peak period demand determinants by rate code for non-residential rate schedules. Staff, Evergy, and the signatories to

⁹ Lange Rebuttal, page 19.

the 2022 Stipulation and Agreement should be ordered to define up to five sets of on-peak demand periods for this study.’ The Commission should reject this recommendation. The Company does not bill customers with this level of detail and while this data does exist in the Evergy Meter Data Management, it is not stored in a format that allows for summation of the 15-minute intervals.”

Staff has requested in DR 204 that Evergy “ 1. Please provide a sample of the 15 minute billing data for the months of June 2023-October 2023 for 100 Evergy Missouri Metro customers taking service rate codes MGS, LGS, LPS, LPS-1, SGA, MGA, and LGS (100 total customers, not 100 customers per rate code) to facilitate initial study of the relationship between 15 minute demand and hourly demand of Evergy Missouri Metro non-residential customers. Include the customer’s rate code and an identification number, but no other customer-identifiable information. 2. Please provide a sample of the 15 minute billing data for the months of June 2023-October 2023 for 100 Evergy Missouri West customers taking service rate codes MOLGS, MOLNS, MOLGP, MOLNP, MOPGS, MOPNS, MOPGP, MOPNP, MOPSU, and MOPTR (100 total customers, not 100 customers per rate code) to facilitate initial study of the relationship between 15 minute demand and hourly demand of Evergy Missouri Metro non-residential customers. Include the customer’s rate code and an identification number, but no other customer-identifiable information.” Staff has also sought clarification regarding existing demand charges in DRs 202 and 203.

b. Should the Commission order production and development of the determinants for assessment of an on-peak demand charge to replace the current monthly billing demand charge, and for potential implementation for customers not currently subject to a demand charge; and as described in Stipulation provision 9 at that estimated cost?

Staff position: Evergy failed to provide an estimated cost. Staff has requested in DR 204 that Evergy “1. Please provide a sample of the 15 minute billing data for the months of June 2023-October 2023 for 100 Evergy Missouri Metro customers taking service rate codes MGS, LGS, LPS, LPS-1, SGA, MGA, and LGS (100 total customers, not 100 customers per rate code) to facilitate initial study of the relationship between 15 minute demand and hourly demand of Evergy Missouri Metro non-residential customers. Include the customer’s rate code and an identification number, but no other customer-identifiable information. 2. Please provide a sample of the 15 minute billing data for the months of June 2023-October 2023 for 100 Evergy Missouri West customers taking service rate codes MOLGS, MOLNS, MOLGP, MOLNP, MOPGS, MOPNS, MOPGP, MOPNP, MOPSU, and MOPTR (100 total customers, not 100 customers per rate code) to facilitate initial study of the relationship between 15 minute demand and hourly demand of Evergy Missouri Metro non-residential customers. Include the customer’s rate code and an identification number, but no other customer-identifiable information.” Staff has also sought clarification regarding existing demand charges in DRs 202 and 203.

20. What is Evergy Missouri Metro’s and Evergy Missouri West’s estimate of the cost for Evergy Missouri Metro and Evergy Missouri West to begin to retain and study data related to the reactive demand requirements of each rate code, and sample customers within each rate code?

Staff position: Evergy failed to provide an estimated cost.

- a. **Should the Commission order Evergy Missouri Metro and Evergy Missouri West to begin to retain and study data related to the reactive demand requirements of each rate code, and sample customers within each rate code as described in Stipulation provision 10 at that estimated cost?**

Staff position: Evergy failed to provide an estimated cost.

WHEREFORE, the Staff respectfully submits its *Statement of Positions* in this case for the Commission's consideration.

Respectfully submitted,

/s/ Carolyn H. Kerr

Missouri Bar # 45718

Senior Staff Counsel

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

573-751-5397 (Voice)

573-526-6969 (Fax)

Carolyn.kerr@psc.mo.gov

Attorney for Staff of the

Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 19th day of January, 2024, to all counsel of record.

/s/ Carolyn H. Kerr