

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

In the Matter of Requests for Customer) **File No. EO-2024-0002**
Account Data Production)

**EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST’S
RESPONSE TO REPORT AND ORDER**

COME NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“EMM”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“EMW”) (collectively, “Evergy” or “the Company”) and pursuant to the Missouri Public Service Commission’s (“Commission”) *Report and Order* (“Order”)¹ issued on May 22, 2024, submits their *Response to Report and Order* (“Response”).

1. Attached hereto as **Exhibit A**, please find a spreadsheet detailing the Company’s deliverability assessments for the various data requests subject to the Commission’s Order.

WHEREFORE, the Company respectfully its Response to the Commission Order.

¹ “3. No later than June 12, 2024, Evergy shall file a pleading stating the individual dates when Evergy can provide the information for each of Data Sets 2, 3, 4, 7, 8a, 8c(2), 8c(3), and 8c(4).” *Order*, p. 24.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorneys for Evergy Missouri Metro and
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served upon counsel for all parties on this 12th day of June 2024, by either e-mail or U.S. Mail, postage prepaid.

/s/ Roger W. Steiner

Roger W. Steiner

General Assumptions

The delivery of each of these items requires Individual work by the same resource and cannot be done in parallel due to the different nature of each request.

Any additional data requests similar to those in the data docket will likely impact the single-threaded Evergy resource from being able to maintain data docket delivery timelines. For example, should the Company be ordered to respond to DRs 159 and 160 in the EMW rate case on an expedited basis, its ability to meet the delivery dates in this document will likely be impacted.

The timelines specified in this document reflect beginning the pre-work ASAP and would be impacted if assumptions/expectations change

Delivery of the files will be through whatever medium that accommodates the size of the file.

If Evergy faces technology or major enterprise issues outside of our control (such as storms or significant customer impact), timelines may be impacted.

Data will be sourced from Evergy's production environment and may not tie directly to rate case data due to the continuous updates and modifications to data, reflecting real-time changes in the production landscape.

DATA REQUEST ASSESSMENT SUMMARY						
ITEM #	DATA REQUESTED	AVAILABILITY ASSESSMENT	DELIVERABILITY ASSESSMENT	NOTES	Delivery Date	Delivery Assumptions
2	For each rate code, provide the total number of customers served on that rate schedule on the first day of the month and the last day of the month; a. For each rate schedule on which customers may take service at various voltages, the number of customers served at each voltage on the first day of the month and the last day of the month (this is only applicable if rate codes are not used to delineate the voltage at which customers are served)	AVAILABLE The data exists in MDM/CCB at individual customer and meter level.	PLAUSABLE DELIVERABILITY This still requires work to pull out, aggregate and validate based on specific requirements. See questions in notes.	Based on total number of active service agreements on each rate code.	7/1/2024	<ol style="list-style-type: none"> This report will be one data extract solution provided in one CSV file for both items 2 and 3. It will include 12 months of data counting backward from the most current, full month plus previous 11 months. Meter type identification and voltage level identification will be included in the extract. Rate code description is as identified in the Evergy billing system. Customer count - Count of active Service Agreements by rate code on the last day of each month (this will serve as both end of month and first of month counts) This is a point in time "count" and will not tie to billing month detail.
3	For each rate code, the number of customers served on that rate schedule on the first day of the month and the last day of the month for which interval meter readings are obtained; a. For each rate code on which customers may take service at various voltages, the number of customers served at each voltage on the first day of the month and the last day of the month which interval meter readings are obtained (this is only applicable if rate codes are not used to delineate the voltage at which customers are served);	AVAILABLE The data exists in MDM/CCB at individual customer and meter level.	PLAUSABLE DELIVERABILITY This still requires work to pull out, aggregate and validate based on specific requirements. And will require components from both CCB/MDM to complete. See questions in notes.	Based on total number of active service agreements with meters that can collect interval data. i.e. AMI meters.	7/1/2024	<ol style="list-style-type: none"> This report will be one data extract solution provided in one CSV file for both items 2 and 3. It will include 12 months of data counting backward from the most current, full month plus previous 11 months. Meter type identification and voltage level identification will be included in the extract. Rate code description is as identified in the Evergy billing system. Customer count - Count of active Service Agreements by rate code on the last day of each month (this will serve as both end of month and first of month counts) This is a point in time "count" and will not tie to billing month detail.

4	For each rate code for which service is available at a single voltage, the sum of customers' interval meter readings, by interval; a. For each rate code on which customers may take service at various voltages, the sum of customers' interval meter readings, by interval and by voltage (this is only applicable if rate codes are not used to delineate the voltage at which customers are served);	PARTIALLY AVAILABLE Interval meter reading is stored at an individual meter level in MDM. The aggregate suggested is not stored in MDM or the data hub. (interval by rate code).	PLAUSABLE DELIVERABILITY Data recording processes currently exist to capture summarized hourly interval data by class. Such processes could be explored to be modified to capture individual rate codes. Currently processes, capture hourly data only.	Based on hourly intervals.	7/24/2024	<p>1. This will be one data extract solution provided in one CSV file that includes 12 months of hourly detail. It will include up to 12 months of data counting backward from the most current, full month plus previous 11 months.</p> <p>2. Each month is a calendar view of data and does not tie to revenue month, billing details, etc.</p> <p>3. The summarized hourly kwh usage data will be provided by rate code.</p> <p>4. Rate code description is as identified in the Evergy billing system.</p> <p>5. Voltage differentiation is noted by individual rate code for each voltage type (primary, secondary, substation, transmission).</p> <p>6. Only rate codes with interval data capability will be included.</p>
5	If any internal adjustments to customer interval data are necessary for the company's billing system to bill the interval data referenced in parts 4. and 4.a., such adjustments should be applied to each interval recording prior to the customers' data being summed for each interval	NOT AVAILABLE The data hub does not reflect any updates to interval usage information.	COMPLEX DELIVERABILITY Do not believe this to be a report ask, but believe this to be a process and system change for data hub.	Evergy's MDM/CCB systems house corrections/updates of data in near real time. Data is posted to the Data Hub, the source for reporting, periodically. Modifications to align data within these systems would require extensive configuration and the utilization of MDM/CCB/Data Warehouse consultants to enable.	7/24/2024	<p>See proposal described above, usage will be summarized by rate code in #4 and Evergy supports a separate rate code for each voltage.</p>
7	Individual customer interval data shall be retained for a minimum of fourteen months. If 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.	AVAILABLE Evergy retains interval data for individual customers as billing standards require in the CCB/MDM systems.	NOT APPLICABLE	Evergy retains interval data for six years in MDM, and summarized usage is retained the data hub. Data hub aggregations began in January of 2020.	NA / Already in Compliance	<p>Nothing to deliver because Evergy is in compliance with this request. As noted in original BDL 1, Evergy retains interval data for six years in MDM, and summarized usage is retained the data hub. Data hub aggregations began in January of 2020.</p> <p>The estimate provided in this document of "no additional cost" was based on the fact that Delivery was NOT Applicable and therefore we did not have to do or build anything.</p>
8	a. Retain individual hourly data for use in providing bill-comparison tools for customers to compare rate alternatives.	AVAILABLE Evergy retains interval data for individual customers as billing standards require in the CCB/MDM systems.	NOT APPLICABLE	Based on retaining individual hourly data. Evergy via a third party, offers a customer facing tool creating bill comparisons for residential customers (with qualifying data). The individual analysis for rate compares is dynamic and Evergy does not store or retain these individual comparisons.	NA / Already in Compliance	<p>Nothing to deliver because Evergy is in compliance with this request. Evergy retains interval data for individual customers as billing standards require in the CCB/MDM systems. Evergy via a third party, offers a customer facing tool creating bill comparisons for residential customers (with qualifying data). The individual analysis for rate compares is dynamic and Evergy does not store or retain these individual comparisons.</p> <p>The estimate provided in this document of "no additional cost" was based on the fact that Delivery was NOT Applicable and therefore we did not have to do or build anything.</p>
8	c. 2) a minimum of 12 months of the data described in parts 2-5;	SEE INDIVIDUAL ITEMS ABOVE	SEE INDIVIDUAL ITEMS ABOVE		See timelines for individual items above	<p>Evergy will provide the most current 12 months of data for items 2-4 on the timelines provided above.</p>

8	c. 3) for rate codes with more than 100 customers, a sample of individual customer hourly data, and identified peak demands for those 100 customers in the form requested at that time (i.e. monthly 15 minute non-coincident, annual 1 hour coincident);	AVAILABLE The data exists in MDM/CCB at individual customer and meter level.	PLAUSABLE DELIVERABILITY Configuration would be needed to facilitate/extract data.	Based on delivery of hourly data for sample of 100 customers.	9/6/2024	<ol style="list-style-type: none"> 1. For the hourly kwh usagae data, the delivery will be multiple data extracts and will be delivered in multiple CSV files. It will be inclusive of each of the (up to 100) customers' individual hourly data for each rate code. 2. Customer defined as a single active service agreement. 3. The non-coincident hourly peak value per calendar month for the identified customers will be delivered in a separate file. The customers provided in the hourly data by rate code will be the same set provided in the non-coincident hourly peak data set. 4. For residential customers, Evergy will provide hourly kwh usage data beginning January 2024. This will ensure customers will meet the criteria of being on the same rate, at the same premise for the entire time period. 5. The amount of data provided for commercial customers will be for the most current 12 months of data. 6. The sample will include customers that have received service on the same rate, at the same premise and for the full duration of the request. 7. Only rate codes with interval data capability will be included.
8	c. 4) for rate codes with 100 or fewer customers, individual customer hourly data, and identified peak demands for those customers in the form requested at that time (i.e. monthly 15 minute non coincident, annual 1 hour coincident).	AVAILABLE The data exists in MDM/CCB at individual customer and meter level.	PLAUSABLE DELIVERABILITY Configuration would be needed to facilitate/extract data.	Based on delivery of hourly data for sample of 100 customers.	9/6/2024	<ol style="list-style-type: none"> 1. For the hourly kwh usagae data, the delivery will be multiple data extracts and will be delivered in multiple CSV files. It will be inclusive of each of the (up to 100) customers' individual hourly data for each rate code. 2. Customer defined as a single active service agreement. 3. The non-coincident hourly peak value per calendar month for the identified customers will be delivered in a separate file. The customers provided in the hourly data by rate code will be the same set provided in the non-coincident hourly peak data set. 4. For residential customers, Evergy will provide hourly kwh usage data beginning January 2024. This will ensure customers will meet the criteria of being on the same rate, at the same premise for the entire time period. 5. The amount of data provided for commercial customers will be for the most current 12 months of data. 6. The sample will include customers that have received service on the same rate, at the same premise and for the full duration of the request. 7. Only rate codes with interval data capability will be included.