

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

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

**STAFF’S RESPONSE TO EVERGY’S RESPONSE
TO COMMISSION’S REPORT AND ORDER**

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through counsel, and in support of its *Response to Evergy’s Response* to the Commission’s May 22, 2024 *Report and Order*, states as follows:

1. On June 12, 2024, Evergy filed its *Response to the Commission’s Report and Order* (“Response”), “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).”¹ The Commission ordered any parties interested in responding to Evergy’s Response to respond no later than June 18, 2024.²

2. Staff reviewed the information provided by Evergy in its June 12, 2024 filing and responds as follows. Overall, and in light of Evergy Missouri West’s pending rate case, File No. ER-2024-0189, Staff suggests that Evergy’s priority be placed on producing customer count data to coincide with the true-up cutoff date in that rate case, and then, on production of sample customer data for use in that rate case. Additional details and requested clarification are described below.

Customer Counts by Rate Code by Month

3. The Commission ordered Evergy to produce the following:

¹ See, *Report and Order*, page 24, “Conclusion,” paragraph 2.
² *Id.*, paragraph 4.

- a. 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); and
 - b. 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).
4. Evergy's Response regarding the above is that:
 - a. 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;
 - b. Meter type identification and voltage level identification will be included in the extract;
 - c. Rate code description is as identified in the Evergy billing system;

- d. 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); and
- e. This is a point in time "count" and will not tie to billing month detail.

5. The Commission also ordered Evergy to provide to Staff, upon request, the information requested or outlined in Data Set 8c.2., which requests a minimum of 12 months of the data described in paragraph 4 above. Evergy responded that it will provide the most current 12 months of data for items 4(a) through 4(d) on the timelines provided by Evergy in its response.

6. Evergy states that it will initially produce the information (customer counts by rate code by month) described by Data Sets 2, 3, and 8c.2. by July 1, 2024, presumably for each of its companies, Evergy Missouri West and Evergy Missouri Metro. A principle use of this information is to understand customer growth in general rate cases. The true-up cutoff in Evergy Missouri West's pending general rate case, File No. ER-2024-0189, is June 30, 2024. At this time, priority should be placed on provision of Evergy Missouri West's customer counts by rate code (and voltage) for the period of July 1, 2023 –June 30, 2024. This information should be provided to Staff by August 2, 2024, consistent with the date for the provision of true-up data in ER-2024-0189.

7. Of concern, however, is that Evergy's response to the provision of the information requested or outlined in Data Set 8c.2. appears to overlook the fact that the pledges made in the Stipulation in File Nos. ER-2022-0129 and 130 were not a one-time

commitment, but were for on-going use in future rate cases. In each general rate case,³ Staff will require 12-14 months of customer count data to coincide with the test year,⁴ 12-14 months of customer count data to coincide with the close of the update period, and 12-14 months of customer count data to coincide with the true-up.⁵

8. In its response to Data Sets 2 and 3, Evergy states, “This is a point in time ‘count’ and will not tie to billing month detail.” If this means not all billing cycles start or end on the last day of a calendar month, and for example, if the June billing cycles extend through July 15, a count of customers on June 30 will not include customers added on July 14, then Staff understands and will take the discrepancy into account.⁶ If this statement means anything else, Evergy should explain why further discrepancies exist.

Customer Usage by Rate Code by Hour

9. The Commission ordered Evergy to produce the following:
- a. 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

³ Staff may also require a subset of this information from time to time. In particular, if time and resources permit, Staff may seek a subset of this information to study customer responses to weather on residential time-based rate plans.

⁴ Because bill cycles and billing months do not perfectly align with calendar months, a lead or lag calendar month is often required to analyze customer data and customer usage data. Because the customer count data will also be used in conjunction with the customer usage by hour data, the lead and lag months will be required for customer count data as well.

⁵ To the extent that the information for a subsequent time period is identical to the information already provided, the information would not need to be provided a second time for that time period. For example, if all data for July 2024 is the same whether it was pulled on August 1, 2024, or January 1, 2025, Staff would not need the information for July 2024 to be provided again.

⁶ Staff notes that while the customer count information specified in the Stipulation is useful for customer growth adjustments in general rate cases, and will also be used in conjunction with the usage by rate code by hour information described below for other purposes, Staff will still require customer counts that tie directly to billing by month and by cycle for other revenue and determinant calculations.

voltages, the sum of customers' interval meter readings, by interval and by voltage; and

- b. 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.

10. Evergy's Response regarding the above is that:

- a. 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.
- b. Each month is a calendar view of data and does not tie to revenue month, billing details, etc.
- c. The summarized hourly kwh usage data will be provided by rate code.
- d. Rate code description is as identified in the Evergy billing system;
- e. Voltage differentiation is noted by individual rate code for each voltage type (primary, secondary, substation, transmission); and
- f. Only rate codes with interval data capability will be included.

In addition, Evergy proposed summarizing usage by rate code, and Evergy supports a separate rate code for each voltage.

11. Evergy states that it will initially produce the information (customer usage by rate code by hour) described by Data Sets 4, 5, and 8c.2. by July 24, 2024, presumably for each of its companies, Evergy Missouri West and Evergy Missouri Metro. A principle use of this information is for calculating customer response to weather in general rate cases for purposes of normalizing retail revenues, billing determinants, and hourly net system input, and various class cost of service and rate design calculations. However, data provided at this point cannot be used for these purposes in the current Evergy Missouri West rate case, ER-2024-0189.

12. In future general rate cases, Staff will require 12-14 months of such customer count data to coincide with the test year, 12-14 months of customer count data to coincide with the close of the update period, and 12-14 months of customer count data to coincide with the true-up in each general rate case.⁷ In addition, Staff requests Evergy state how the “Primary Discount Rider,” and any related provision is treated with regard to the adjustments discussed in Data Set 5.

Sample Customer Usage Information

13. The Commission ordered Evergy to provide Staff the following, upon request, from datasets 8c.3. and 8c. 4:

- a. 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); and

⁷ Staff may also require a subset of this information from time to time. In particular, if time and resources permit, Staff may seek a subset of this information to study customer responses to weather on residential time-based rate plans.

- b. 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).
14. Evergy's Response regarding the above is that:
- a. For the hourly kwh usage 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;
 - b. Customer defined as a single active service agreement;
 - c. 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;
 - d. 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;
 - e. The amount of data provided for commercial customers will be for the most current 12 months of data;
 - f. 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; and

g. Only rate codes with interval data capability will be included.

15. Evergy states that it will produce the information (sample customer usage information) described by Data Sets 8c.3. and 4. by September 6, 2024, presumably for each of its companies, Evergy Missouri West and Evergy Missouri Metro. A principle use of this information is for estimating customer impacts in general rate cases.

16. However, data provided three months from now cannot be used for these purposes in the current Evergy Missouri West rate case. This information is related to information sought by Staff in File No. ER-2024-0189 under staff data requests (DRs) 159 (hourly loads for four years), and 160 (non-coincident peak demands related to a tariff change Evergy seeks in its pending rate case), and which the Commission has ordered Evergy to provide. Therefore, Staff suggests priority be given to these DRs with the clarifications described below, second only to the customer count information described above.

17. In future general rate cases, Staff will require 1 – 4 years of sample customer hourly data, with one year's data necessary in essentially every rate case, and longer periods necessary from time to time for deeper study or when more substantial changes to rate structure are sought. It is likely that when longer periods are necessary it will be only for subsets of customers.⁸

18. With regard to the identified peak demand data, Staff does not require the non-coincident hourly peak demand, but instead requires the 15 minute non-coincident peak demand, as referenced in the Stipulations in File Nos. ER-2022-0129 and 0130.

⁸ Staff may also require a subset of this information from time to time. In particular, if time and resources permit, Staff may seek a subset of this information to study customer responses to weather on residential time-based rate plans.

Staff understands that Evergy is considering some alignment of its peak demand definitions which are currently 15 minute peak demand for customers of Evergy Missouri West, and 30 minute peak demands for customers of Evergy Missouri Metro. As such, Staff will accept the monthly billing determinants of each sample customer who is subject to a demand charge.

19. Based on that, Staff suggests Evergy provide the above-described information in a way Staff can readily match the billing determinants to the hourly sample data, such as through including a premise ID or other information, in each set of data, as well as a statement of the bill cycle start/end dates with the billing determinant information.

WHEREFORE, Staff asks that the Commission accept Staff's Response to Evergy's Response to Commission's Report and Order.

Respectfully submitted,

/s/ Travis J. Pringle

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 18th day of June 2024.

/s/ Travis J. Pringle