

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

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

**EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST’S REPLY TO STAFF’S
RESPONSE TO EVERGY’S RESPONSE TO COMMISSION’S 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, for its *Reply* (“Reply”) to Staff (“Staff”) for the Missouri Public Service Commission’s (“Commission”) *Response to Evergy’s Response to Commission’s Report and Order* (“Staff Response”) filed on June 18, 2024, states as follows:

**STAFF’S RESPONSE GOES BEYOND WHAT WAS ORDERED BY THE COMMISSION
AND SHOULD BE REJECTED AS AN ATTEMPT TO ADD OR RELITIGATE ISSUES IN
THIS DOCKET**

1. The Company will respond to the majority of Staff’s June 18 response (Staff Response), but the Commission should be aware that much of Staff’s Response seeks to add issues or expand the Commission’s order. This goes beyond the parameters of what Staff was ordered to file- “Any party having a response to Evergy’s proposed **individual dates to provide the Data Set information** shall file such information no later than June 18, 2024” (emphasis added). The Staff Response goes far beyond a discussion of Staff’s issues with the dates the information can be produced. The Company’s June 12, 2024 response gave the dates the Company could produce the information for data sets 2, 3, 4, 7, 8a, 8c(2), 8c(3), and 8c(4). However, the Staff has asked the Company to give priority to responding to data requests 159 and 160 in the EMW rate case (see paragraph 16 of the Staff Response). The Company has prioritized the production of its response to data set 8c(3) and (4) (which are similar but not identical to what Staff is asking in data requests 159

and 160) and notes that due to this prioritization the Company's other production dates contained in its June 12 response will not be met. The Commission should disregard Staff's other comments.

CUSTOMER COUNTS BY RATE CODE BY MONTH

2. As requested by Staff in paragraph 6 of the Staff Response, Evergy will provide EMW's customer counts by rate code (and voltage) for the period of July 1, 2023 through June 30, 2024 by August 2, 2024 for use by Staff in ER-2024-0189.

3. With regard to Staff's comments in paragraph 7 of the Staff Response, Evergy will be able to supply 12-14 months of customer count data to coincide with the close of a future rate case update period and 12-14 months of customer count data to coincide with a future rate case true-up period. However, Staff's footnote 3 notes that Staff may require a subset of this data from time to time. In response to this footnote, the Company will provide its ability and cost to respond to these requests when they are received. In paragraph 8 of the Staff Response, Staff correctly points out that not all billing cycles start or end of the last day of a calendar month and so the Company data will not tie to billing month detail. The comment from Evergy around being "a point in time count," is just that. It is a count of active service agreements as of a particular day. It does not tie to customers billed on those days, or even that month. Staff's footnote 6 states "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." Evergy points out that the Staff requirement for the customer counts to tie directly to billing by month and by bill cycle is an **expansion of the request in the data docket and therefore has not been ordered as part of this case**. The counts of customers by rate code on a particular day, such as the first and last day of the month as requested in items 2 and 3 is a very different data pull than the customer counts by billing

month and bill cycle. Therefore, the additional work requested in the Staff Response has not been part of the assumptions or estimations given in previous testimony or filings in this case and the Commission has not ordered the Company to provide it. Evergy has also noted in the general assumptions “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.” For clarity, the customer count and usage data provided as a part of the asks in this data docket will not tie to the rate case data provided. That is the case for this current case as well as any future cases. Rate case data is based on billing determinants obtained from the Company billing system and the meter reading system being used to provide hourly data is separate. Due to the operational nature of both systems, without special effort, the separate data will not align perfectly.

4. Notwithstanding the above, the Company provides customer count which ties to billing data and test year revenue by test year month in every rate case (test year, update and true-up period), which Staff can use for their revenue calculations.

CUSTOMER USAGE BY RATE CODE BY HOUR

5. In paragraph 12 of the Staff Response, Staff introduces its expectations for data produced in future rate cases. While the Company can produce 12-14 months of customer count data to coincide with the test year, close of the update period, and true up, the Company wants to be clear that it interprets “such customer count data” in paragraph 12 as “customer usage by rate code.” If the interpretation is correct, Evergy can provide the summarized usage by rate code by hour as part of future rate case data requests based on the assumptions noted in Evergy’s June 12th filing. Staff adds a request in paragraph 12 regarding Evergy’s “Primary Discount Rider” – the Company has not evaluated this request as it was not part of the order in this case.

SAMPLE CUSTOMER USAGE INFORMATION

6. In Paragraph 16 of the Staff Response, Staff states that the information requested in 8c(3) and 8c(4) is related to information being sought by Staff in DRs 159/160 in case ER-2024-0189. While the information requested in the data requests has some similarities to the data sets in this docket, the data requests do not ask the same question as in the data docket, go beyond the scope of what was ordered in this docket by the Commission, and therefore must be evaluated separately. To avoid confusing the two dockets, Evergy will not respond to comments concerning rate case data requests 159 and 160 in this filing.

7. In Paragraph 18 and 19 of the Staff Response, Staff clarifies that it requires 15-minute interval non-coincident peak demand data and wants other usage data refinements. As indicated in Schedule BDL-1, in the column titled Notes (which set forth how the Company could provide the data sets) (attached to Direct Testimony of Bradley D. Lutz), the Company's proposals are based on hourly data. Hourly data is what the Commission ordered the Company to provide. The request for 15-minute level data is an expansion of the Commission's order in this case, and an estimate of cost/effort to produce 15-minute level data has not been developed by Evergy. In addition to 15-minute interval data for data set 8c(3) and 4, Staff is also now requesting the monthly billing determinants of each sample customer who is subject to a demand charge. This is another expansion of what the Commission ordered in this case.

WHEREFORE, the Company respectfully files its Reply to Staff's Response.

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner, MBN 39586
Evergy, Inc.
1200 Main – 16th Floor
Kansas City, Missouri 64105
Phone: (816) 556-2314
E-mail: roger.steiner@evergy.com
Fax: (816) 556-2110

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

**Attorneys for Evergy Missouri Metro and
Evergy Missouri West**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served upon counsel for all parties on this 25th day of June 2024, by either e-mail or U.S. Mail, postage prepaid.

/s/ Roger W. Steiner

Roger W. Steiner