

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

In the Matter of Evergy Missouri West, Inc.)	
d/b/a Evergy Missouri West’s Request for)	<u>File No. ER-2024-0189</u>
Authority to Implement A General Rate)	Tariff No. JE-2024-0110
Increase for Electric Service)	

EVERGY’S REPLY TO STAFF RESPONSE TO ORDER DIRECTING FILING

COME NOW Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“EMW” or “Company,” by and through their counsel and, for its *Reply* (“Reply”) to Staff (“Staff”) for the Missouri Public Service Commission’s (“Commission”) *Response to Order Directing Filing* (“Staff Response”) filed on June 11, 2024, states as follows:

DR 159

Please provide hourly load data for the period 1/1/2020 - 1/1/2024 for a random sample of customers taking service throughout the identified time period, for each of the following groups of customers. (For SGS customers, include with each set of customer data identification of whether each customer receives service with or without a demand charge; for Residential customers include with each set of customer data identification which rate code the customer receives service under as of December 31, 2023.) a. 100 SGS customers who are not on the space heating rate b. 100 SGS customers who are on the space heating rate c. 100 LGS customers d. All LP customers e. 100 residential customers.

1. There are several important differences between the question asked in DR 159 and what the Commission ordered in the data docket (EO-2024-0002). First, DR 159 is asking for four years of data, while in the data docket the time period is twelve months.

2. Next, DR 159 requests data by rate class and will require a different process for sampling than used for data docket assumption which will be provided by individual rate code.

3. As pointed out in Evergy’s filings in EO-2024-0002 regarding data sets 8c(3) and 8c(4), providing a large amount of data for residential customers on the new TOU rates will be challenging. The Company indicated in the data docket that residential customer samples will include hourly data beginning in January 2024. Finally, DR 159 requests information that includes

demand charge detail for certain customers and rate classes. There is not a demand charge component requested in the data docket and therefore the Company was not ordered to provide this data in the data case by the Commission order. The Company will need to determine business requirements and solution options for this component of DR 159 before a timeline for delivery can be estimated.

4. Given these differences, the Company has not estimated the effort to provide Staff's additional requirements for DR 159. **The Company can provide the EMW data as spelled out in the assumptions noted in the June 12, 2024 filing for the Data Docket request 8c(3) and 8c(4) as ordered by the Commission.** To provide any additional data the Company will need time and dedicated resources to assess data availability and approach to retrieving the data.

DR 160

For each of the following customer sets, for the period 1/1/2022 - 1/1/2024, for a random sample of customers taking service throughout the identified time period, for each of the following groups of customers (1) please provide hourly load data, and (2) please provide each customer's NCP by billing month for the same period, including identification of the hour in which such NCP occurred, and (3) please provide each customer's NCP by calendar month for the same period, including identification of the hour in which such NCP occurred. (For SGS customers, include with each set of customer data identification of whether each customer receives service with or without a space heating discount; for Residential customers include with each set of customer data identification which rate code the customer receives service under as of December 31, 2023.) a. 100 SGS customers who are not subject to a demand charge b. 100 SGS customers who are subject to a demand charge c. 100 LGS customers d. All LP customers e. 100 residential customers

5. DR 160 is asking for 2 years of data, while the data docket assumption was 12 months.

6. DR 160 asks for random sampling is by rate class and will require a different process for sampling than used for data docket assumption which was by individual rate code.

7. As pointed out in Evergy's filing in EO-2024-0002 regarding items 8c(3) and 8c(4), providing a large amount of data for residential customers on the new TOU rates will be challenging.

The Company indicated in the data docket that residential customer samples will include hourly data beginning in January 2024

8. DR 160 is requesting usage data by billing month. This is not a component that was being considered by the Company, or ordered by the Commission for the data docket data sets. The usage provided in the data docket will be by hour/day/month but without indicators of billing period. This means that the data will effectively be by calendar month.

9. DR 160 is asking for the non-coincident peak (“NCP”) value by billing period and calendar period. The Company’s data docket assumptions included finding the hourly NCP value for the calendar period. There was no consideration in Evergy’s estimated timelines in the data docket for determining the NCP value by billing period as it was not part of the Commission order.

10. DR 160 is asking for the NCP value and the hour in which the peak occurred. As described in the assumptions for delivery of data in data sets 8c(3) and 8c(4) in the data docket, the NCP hourly peak value was to be delivered in a separate set of data from the hourly detail. The request in the data docket did not ask to specify the time when the peak occurred. While this data point could be added with minimal design impact, the ask is an expansion of the Commission order and may alter production timelines.

11. Given these differences between DR 160 and what the Company was ordered to provide in the data docket, the Company has not estimated the effort to provide these new requirements for DR 160. **The Company can provide the EMW data as spelled out in the assumptions noted in the June 12, 2024 filing for the Data Docket request 8c(3) and 8c(4) as ordered by the Commission.** Based on feedback in the Staff’s Response in EO-2024-0002 (paragraph 16), the Company is willing to pause the work on the summarized hourly usage by rate code request and turn attention to work on providing the data associated with 8c(3) and 8c(4) in the

data case. The Company believes if the team could change course immediately, the Company could provide the data by mid-August. For clarity, the data will be provided based on assumptions noted for delivery of 8c(3) and 8c(4) that case, and it will not tie to test year data in the rate case. To provide the additional data requested in DR 160 by Staff, the Company will need time and dedicated resources to assess data availability and approach to retrieving the data.

12. The Company understands that as part of the Staff Response in case EO-2024-0002 the Staff now requires 15-minute interval data to satisfy the request in 8c(3) and 8c(4) as well in DR 160. The Company clearly stated in Schedule BDL-1 in the “notes” column that the estimates provided by the Company in the in the data case were based on delivering data at the hourly level. The Company’s estimates were utilized by the Commission in the data case order.

WHEREFORE, the Company respectfully submits its Reply to Staff’s Response.

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 25th day of June 2024 by either e-mail or U.S. Mail, postage prepaid.

/s/ Roger W. Steiner

Roger W. Steiner