Exhibit No.:

*Issue(s):* Time of Use

- Customer Outreach

Witness: Tammy Huber

Sponsoring Party: MoPSC Staff
Type of Exhibit: Direct Testimony

Case No.: ER-2024-0189

Date Testimony Prepared: June 27, 2024

#### MISSOURI PUBLIC SERVICE COMMISSION

# FINANCIAL & BUSINESS ANALYSIS DIVISION CUSTOMER EXPERIENCE DEPARTMENT

#### **DIRECT TESTIMONY**

**OF** 

**TAMMY HUBER** 

EVERGY MISSOURI WEST, INC., d/b/a Evergy Missouri West

CASE NO. ER-2024-0189

Jefferson City, Missouri June 27, 2024

1	TABLE OF CONTENTS OF
2	DIRECT TESTIMONY OF
3	TAMMY HUBER
4	EVERGY MISSOURI WEST, INC.,
5	d/b/a Evergy Missouri West
6	CASE NO. ER-2024-0189
7	HISTORY1
8	EDUCATION4
9	ALARMIST AND MISLEADING COMMUNICATIONS
10	HEALTH/SAFETY11
11	CONCLUSION12

1		DIRECT TESTIMONY
2		OF
3		TAMMY HUBER
4		EVERGY MISSOURI WEST, INC.,
5		d/b/a Evergy Missouri West
6		CASE NO. ER-2024-0189
7	Q.	Please state your name and business address.
8	A.	My name is Tammy Huber, 200 Madison Street, Jefferson City, MO 65101.
9	Q.	By whom are you employed and in what capacity?
10	A.	I am employed by the Missouri Public Service Commission ("Commission") as
11	a Senior Res	earch/Data Analyst for the Customer Experience Department ("CXD") in the
12	Financial and	Business Analysis Division.
13	Q.	Please describe your education and work background.
14	A.	Please see Schedule TH-d1.
15	Q.	What is the purpose of your direct testimony?
16	A.	I will discuss concerns regarding portions of Evergy Missouri West's Time of
17	Use ("TOU")	customer outreach.
18	HISTORY	
19	Q.	Can you provide a brief history of the establishment of the TOU rates for
20		ouri West ("EMW") customers?
21	A.	Yes. As part of Evergy Missouri West's 2018 rate case (Case No.
22		6), EMW began offering an opt-in TOU rate, effective October 1, 2019.
23	This was a pi	lot program. Evergy Missouri West made presentations to the Commission and

to stakeholders regarding the TOU pilot through December of 2021. According to its report in March of 2021, Evergy<sup>1</sup> had reached 155% of its enrollment goal. As part of Case No. ER-2018-0146, Evergy committed that "KCP&L and GMO will submit a Residential TOU rate design in their next rate cases based on lessons learned from the TOU service." Evergy also agreed to "evaluate leading practices on customer education and engagement on TOU deployment."<sup>2</sup>

Q. Was the Residential TOU design part of the next rate case?

A. No. In Evergy Missouri West's next rate case (Case No. ER-2022-0130), Evergy requested several optional time-based rate plans for residential customers; however, it did not include its preferred Residential TOU rate design. Staff recommended implementation of a low differential time-based rate plan as the default residential rate plan, which merged the Residential General Service rate plan and the Residential Space Heating discounted rate plan. Staff testimony included recommendations to rely on Evergy's existing "Wait 'til eight,3" education and marketing strategy.

On December 8, 2022, the Commission ordered what it considered to be a "modified version" of Evergy and Staff's proposals, with the Evergy-designed Two-Period Time of Use rate plan as the default residential rate plan. The low-differential Staff-recommended Residential Peak Adjustment rate plan and the other highly-differentiated Evergy rate plans were also provided as options to customers, while the Residential General Service rate plan and the Residential Space Heating discounted rate plan were eliminated. This resulted in rate

<sup>&</sup>lt;sup>1</sup> For purposes of TOU customer outreach discussion and convenience, when Evergy is referred to throughout this testimony it will be understood that Evergy is defined as both Evergy Missouri West and Evergy Missouri Metro combined.

<sup>&</sup>lt;sup>2</sup> Case Nos. ER-2018-0145 and 0146, Non-Unanimous Partial Stipulation and Agreement Concerning Rate Design Issues, September 25, 2018, Page 3.

<sup>&</sup>lt;sup>3</sup> "Wait 'til eight" was a catch phrase used by Evergy in the TOU pilot phase.

- offerings which included a default TOU rate for residential customers along with three other TOU rate options. Rate changes became effective for customers in October of 2023.
  - Q. What guidance did the Commission provide in EMW's last rate case?
  - A. The Commission issued an Amended Report and Order in Case Nos. ER-2022-0129 and ER-2022-0130 on December 8, 2022, that ordered, "Evergy shall implement a program to engage and educate customers in the approximately ten-month lead-in time until its tariff provisions regarding the 2-period TOU rate as the default rate for residential customers becomes effective."

In that same Order the following was included at page 74:

Evergy shall work with Staff and OPC and permit them a chance to review materials related to the education program and to the implementation of TOU rates from October 1 through December 31, 2023, to ensure the program and implementation have a maximum potential for success. Further Evergy will eliminate the identified residential rate codes and transition customers to the identified existing codes on or after October 1, 2023, as they transition to the 2-period TOU rate.

On September 8, 2023 Evergy filed its "Application for Approval of Tariff Revisions to Time-of-Use Program, Request for Waiver of 60 Day Notice Requirement, and Motion for Expedited Treatment," which was ultimately granted. This resulted in the Staff-recommended Residential Peak Adjustment rate plan being the default residential rate plan.

- Q. Does CXD Staff believe EMW is in compliance with the Commission orders in regard to TOU customer outreach?
- A. No, not entirely. Staff believes EMW has made substantial efforts to make customers aware of the TOU implementation; however, Staff does not agree that EMW has

\_

<sup>&</sup>lt;sup>4</sup> Case Nos. ER-2022-0129 and 0130, Amended Report And Order, December 8, 2022, Page 99.

<sup>&</sup>lt;sup>5</sup> ET-2024-0062

been effective in developing customer education and outreach materials, and implementing a program to fully engage and educate its customers. Staff does not believe that customers have a good understanding of the TOU rate options partially because of the tactics used during the beginning phases of the campaign. If the campaign had focused more on educating customers, customer choice,<sup>6</sup> and the rate impacts for all customers of the elimination of the discounted residential rate plan, without utilizing the mandate tactic and alarmist marketing, it might have been more successful.

- Q. What do you mean by mandate tactic?
- A. EMW made a decision to emphasize the word "mandate" in its communications with its customers that left customers feeling more negative about the change in their rates than they would have otherwise. The approach they used in their marketing was fear-based and it clouded important educational messages.
  - Q. What do you mean by alarmist marketing?
- A. Evergy marketing focused on peak pricing in a manner that was confusing customers as to the overall bill impacts of the time-based rate plans, especially when combined with Evergy's failures to adequately educate customers as to the impact of the rate changes.

#### **EDUCATION**

Q. Did EMW focus on educating customers as part of its strategy, as the Commission ordered it to?

<sup>&</sup>lt;sup>6</sup> Focus on rate options was more critical prior to the change to the Residential Peak Adjustment rate plan as the default rate plan. Prior to the Commission order that the Residential Peak Adjustment rate plan be the default residential rate plan, informing customers of the option of the Residential Peak Adjustment rate plan was critical for those customers who did not desire to be on the high-differential Two Period rate plan.

- A. No. During the On-The-Record Presentation on April 2, 2024,<sup>7</sup> Commissioner Scott Rupp asked EMW about some of the challenges and lessons learned during the TOU implementation. In response EMW stated, "All the research showed that choice would get customers to engage. Because it made it about them, *it was less about learning about our new rate structures*. We are putting the power in your hands to make a choice. It took a while for them to understand and believe but that was important (emphasis added)."
  - Q. Were there indications that customers were not being educated?
- A. Yes. According to the Monthly Time of Use Customer Transition Reporting in Case No. EW-2023-0199,<sup>8</sup> during Wave 2<sup>9</sup> customers reported concern and confusion about switching to TOU. The results showed 71% of customers surveyed still believed their electric bill would go up instead of down and 42% of customers believed they would not be able to use electricity when they want or need to. In both of those categories the percentages actually increased from Wave 1 to Wave 2. The survey showed that although awareness had increased, there was also an increase in customer concern and misunderstanding.
- Q. Evergy Missouri West performed studies and conducted surveys that showed customers want choice in their rate options. Did EMW use those findings to help educate customers?
- A. No, Evergy Missouri West did the opposite of that. Customers want choice, but Evergy's use of the "mandate" verbiage conveyed the opposite of choice. In November of 2021,

<sup>&</sup>lt;sup>7</sup> Case No. EW-2023-0199, On the Record Presentation, April 2, 2024. No transcript but can be found in the Commission's Video Webcast Archive on YouTube. <a href="https://youtu.be/e6-z5AQOAOs?t=4098">https://youtu.be/e6-z5AQOAOs?t=4098</a>

<sup>&</sup>lt;sup>8</sup> Case No. EW-2023-0199, Monthly Time of Use Customer Transition Reporting, January 2024, Page. 41.

<sup>&</sup>lt;sup>9</sup> 3 Waves described as part of the TrueNorth Research – Methodology: 3 Waves: Baseline (May-W1), Selection (September -W2) & Transition (December-W3), 15-minute online survey with~600 customers in each wave, Blind study among Evergy customers. Using 3<sup>rd</sup> party survey panels (similar to how JD Power conducts their survey).

1	EMW conducted a Customer Advisory Panel survey <sup>10</sup> that found **
2	
3	
4	
5	
6	
7	
8	** This survey showed there is a solid
9	link between knowledge of the rate plans and customer satisfaction. With the knowledge that
10	EMW had, it could have focused on the positive aspects of TOU and emphasize those options
11	and customer choice to ensure customers saw the value in TOU rates.
12	Q. Are there other examples that you are aware of in which Evergy seemed to miss
13	opportunities to educate its customers?
14	A. Yes. After the Commission provided its guidance in Case No. ER-2022-0130,
15	Evergy Missouri West's Senior Vice President, Public Affairs and Chief Customer Officer,
16	Charles A. Caisley was quoted multiple times in September 2023 news articles saying,
17	"Evergy has always advocated for customer rate choice and does not support mandated
18	time-based rates. Customers, elected officials and other stakeholders have clearly voiced their
19	concerns about mandating summer peak pricing"11 According to Mr. Caisley, quoting a past
20	JD Power survey, " when pricing options are forced on electric utility customers, they

<sup>10</sup> Confidential Schedule TH-d2, Pages 3-4.
11 Columbia Missourian/KCUR Kansas City Public Radio/KXCV Norwest Missouri Public Radio/Missouri Business Alert by Allison Kite/The Missouri Independent, September 13, 2023; Daily Energy Insider by Dave Kovaleski, September 15, 2023.

respond with significantly lower customer satisfaction scores."<sup>12</sup> Mr. Caisley further stated, "Additionally, Evergy's 2022 Rate Research showed that customers would be less favorable of Evergy if ordered to transition to TOU pricing."<sup>13</sup>

Based on EMW's own research, it seems apparent that customers would be dissatisfied and feel like they did not have a choice. Instead of figuring out how to overcome or mitigate the situation, EMW went in the opposite direction. Evergy Missouri West made statements that it did not support the mandate, causing more confusion and frustration amongst customers. The focus should have been on the customer choice that the surveys and research had shown customers wanted. The negative statements only hurt the education of customers.

Q. Are there other examples of third parties offering different strategies than those selected by EMW?

A. Yes. Evergy Missouri West utilized The Brattle Group<sup>14</sup> to seek out observations from other jurisdictions. In a presentation on March 28, 2023, one of the bullet points clearly states that "Most utilities have a catch phrase or mascot to emphasize the appeal of the TOU rate or behaviors to facilitate bill savings. . ." As part of Every Missouri West's pilot, EMW used the "Wait 'til 8" and "Switch, Shift, Save"<sup>15</sup> campaigns in an effort to make messaging easy to remember and understand. Evergy Missouri West survey results consistently showed customers wanted more options when it comes to rates. A good solution would have been to put a focus on the terminology around a phrase used in the monthly survey, "You now have the ability to choose from four new time-based rate plans to help save money and align with your

<sup>&</sup>lt;sup>12</sup> Direct Testimony, Charles A. Caisley, ER-2024-0189, Page. 6, lines 13-14.

<sup>&</sup>lt;sup>13</sup> Direct Testimony, Charles A. Caisley, ER-2024-0189, Page. 6, lines 14-16.

<sup>&</sup>lt;sup>14</sup> The Brattle Group provides consulting services and expert testimony in economics, finance, and regulation to corporations, law firms, and public agencies.

<sup>&</sup>lt;sup>15</sup> Both "Wait 'til 8" and "Switch, Shift, Save" were catch phrases used in Evergy's pilot TOU campaign and were well received by its customers.

- personal budget, lifestyle, and energy usage."<sup>16</sup> Instead, EMW used phrasing that would likely cause customer dissatisfaction to increase, such as using the word mandate.
  - Q. Do you consider EMW's TOU education campaign successful?
  - A. To the extent of measuring on awareness alone, yes. The TOU Campaign Dashboard that the Company files in case EW-2023-0199 tracks customer awareness, online enrollments and contact center engagements, and contains a summary of rate enrollment numbers. In the most recent filing of this dashboard on April 2, 2024, Awareness of New Rate Options was at 97% and Awareness of Mandatory TOU Change was at 87%. I would consider EMW's TOU campaign to make customers aware of the rate plans successful, but not successful if measuring education and engagement.
  - Q. Based on your review of their outreach efforts, was the strategy described by EMW in the On the Record presentation on April 2, 2024 a successful one?
  - A. No. Evidence shows that the quote in which EMW stated, "... it was less about learning about our new rate structures" (emphasis added) is accurate in that the Company deemphasized education. However, it sabotaged its own strategy of focusing on customer choice by relying heavily on the mandate tactic.

#### ALARMIST AND MISLEADING COMMUNICATIONS

- Q. Does Staff have concerns with the alarmist type of wording EMW used in the outreach efforts when attempting to educate its customers?
- A. Yes. The Company continually used phrases such as "mandatory," "mandated," and "required." Customers were told to "pick your rate plan by October or you will default to

<sup>&</sup>lt;sup>16</sup> Case No. EW-2023-0199, Monthly Time of Use Customer Transition Report, January 2024, Page 100.

the . . ." These phrases and messages are all associated with negative feelings. Customers felt the default plan would be something they did not want forced upon them, while already feeling like they were being forced into a plan they did not want.

Q. Were any of the messaging concerns addressed by the Commission?

A. Yes. During the On the Record presentation, on January 22, 2024, <sup>17</sup> Commissioner Kolkmeyer asked the Company if it still referred to the TOU implementation as "mandated." The Company's response was, "Specific to the overall implementation last year with the specific messaging we used was that Missouri was moving to time-based rates and then we moved into the offerings that Evergy had . . . We didn't use the mandated language, it was more that we were moving to time-based rates." The Commission Chairman at this time, Scott Rupp, clarified, ". . . we were told that when you initially started getting the pushback from politicians and stuff that Evergy pivoted and started using mandate in all of their publications and everything to try to remind customers that it was not them, so basically to deflect some blame and that just kind of added fuel to the fire. Like oh, this is mandated when in reality, every one of our orders is a mandate."

The Chairman asked, "in your communications with the customer, obviously it's still with us because it's in several of your slides, are you still referring to this as a mandate um because we talked about this last time and the implications of that word, so how frequently are you using the word mandate in your customer facing communications?" Evergy replied,

<sup>&</sup>lt;sup>17</sup> Case No. EW-2023-0199, On the Record Presentation, January 22, 2024. No transcript but can be found in the

"No, the answer is no. We are not referring to the mandatory rate implementation, in fact as we have moved past the implementation, we are now focusing on the implementation itself."

Attached as Schedule TH-d3 are specific examples of some of the outreach used during 2023 which clearly included the specific terms "mandatory" and "mandated". The terms are highlighted throughout the document along with some other phrases Staff believes to be concerning. Evergy chose to deflect the customer negativity and dissatisfaction onto the Commission, and then misinformed the Commission when questioned about the outreach efforts.

- Q. Did Staff receive any feedback from customers regarding the TOU customer outreach efforts made by EMW?
- A. Yes. There were customer complaints, telephone calls, inquires, and public comments made to Staff. Examples of some of these public comments can be found in Schedule TH-d4. There was fear from customers they would not have the option to change their plan, misunderstanding that customers would not benefit at all from TOU rates, and belief that communication by EMW was misleading and not informative. Some customers felt that the information was confusing and frightening. Many customers did not understand how to pick the best plan for their lifestyle. There was also a sense of urgency in the messaging about the date in which customers had to choose their rate plan. Some customers felt alarmed and confused about the date in which they would default to their new plan.
  - Q. Were there any other comments that you believe misled customers?
- A. Yes. Evergy Missouri West continually used "Missouri" in communications to its customers. Evergy said "Missouri" is moving to time-based rates instead of "Evergy Missouri." This information is misleading and makes it sound like the entire state of

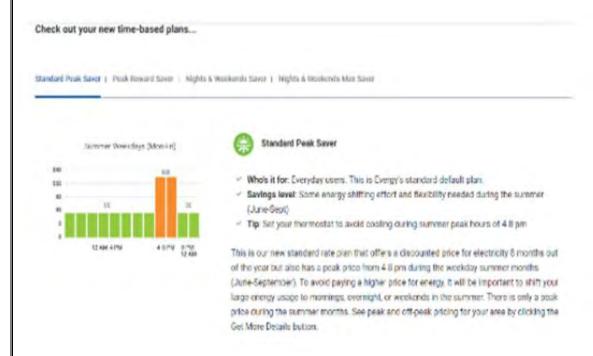
- 1 Missouri is moving to this rate structure which is simply not true. Schedule TH-d3 highlights
  2 multiple examples of messages that are concerning to Staff.
  - Q. Were there other ways in which the marketing was alarmist?
  - A. Yes. Evergy's marketing was alarmist in a manner which put customer health and safety at risk.

#### **HEALTH/SAFETY**

Q. Does Staff have concerns with customers' health and safety in relation to portions of EMW's education campaign?

A. Yes. In early publications<sup>18</sup> (see below), EMW advised customers to avoid cooling during peak hours. Although the screenshot is a little unclear, the original source may be found in Mr. Caisley's testimony schedule referenced below. The digital document found in the schedule is also a little unclear. The "Tip" that is concerning about the middle of the page states, "Set your thermostat to avoid cooling during summer peak hours of 4-8pm." To many customers this is sending a message to "AVOID COOLING". This "Tip" could be a potentially dangerous situation to an elderly person that interprets that message literally to mean avoid cooling altogether. Instead the message could have been simply to encourage customers to turn their air conditioners up a few degrees during peak hours, or to consider the overall bill impact of cheaper energy use during some hours which would offset the increased cost of keeping homes at temperatures that are comfortable and safe. This fear-based type of messaging is concerning to Staff. It was a more alarmist approach than trying to educate customers early on about the plans that may be the best fit for them based on their needs.

<sup>&</sup>lt;sup>18</sup> Direct Testimony, Charles A. Caisley, ER-2024-0189, Schedule CAC-2, Page 30 of 141 also contains this screenshot.



#### **CONCLUSION**

- Q. Based on your review of EMW's customer outreach and education plan, would you consider it to be successful?
- A. No. Although EMW made customers aware of the implementation of TOU, EMW chose to use an alarmist and fear-based approach instead of educating its customers. They ignored their own customer research on customer choice, and did not make customer options the center of the marketing campaign to reflect a positive experience, which could have lessened the negative feelings of change for its customers. EMW's focus was not about educating customers on the rate options or customer choice, but more on required mandates.
- Q. Has CXD Staff made Evergy Missouri West aware of its concerns that have been discussed within your direct testimony?

5

6

7

8

9

- A. Yes. CXD Staff witness Sarah Fontaine provided testimony in Case No. EC-2024-0092 which highlights in Count 5 and Count 6 some of the issues with the outreach efforts.
  - Q. Are there other Staff witnesses that will discuss the TOU related issues?
  - A. Yes. Staff witnesses Sarah L.K. Lange will discuss Time of Use Residential Revenue Adjustment and Time of Use Tracker. Staff witness Jared Giacone will discuss cost recovery of deferred education costs.
    - Q. Does this conclude your direct testimony?
    - A. Yes, it does.

#### BEFORE THE PUBLIC SERVICE COMMISSION

#### OF THE STATE OF MISSOURI

In the Matter of Evergy I d/b/a Evergy Missouri W Authority to Implement A Increase for Electric Serv	est's R A Gene	lequest for	) )	Case No. ER-2024-0189
	AFI	FIDAVIT OF	TAMN	1Y HUBER
STATE OF MISSOURI	)			
COUNTY OF COLE	)	SS.		

COMES NOW TAMMY HUBER and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Direct Testimony of Tammy Huber*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

**JURAT** 

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this \_\_\_\_\_\_ day of June 2024.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070

Ususullankin Notary Public

#### **Tammy Huber**

#### **Educational and Employment Background and Credentials**

I am currently a Senior Research/Data Analyst in the Customer Experience Department of the Missouri Public Service Commission ("Commission"). I have held my position as a Senior Research/Data Analyst (former title Utility Policy Analyst II) since December 2017. Prior to December of 2017 I worked in the Energy Resources Department as a Utility Policy Analyst II from November 2011 through June 2014, I worked in the Engineering and Management Services Unit as a Management Analyst. Previously, I was employed by the Missouri Department of Transportation (MODOT) as an Auditor in the Internal Auditing Department. Prior to my employment with MODOT, I was employed by the Commission in the General Counsel's Office.

I earned a Bachelor of Science in Business Administration with emphases in Business Management from Columbia College in October 2008. I completed additional coursework in 2009 from Columbia College in Accounting.

As an analyst for the Commission, I have participated in and conducted customer service and business office operations reviews. I have researched and managed a number of customer complaints and public comment projects. I have prepared and reviewed audit and investigative reports at the Commission. I have previously provided testimony before the Commission. I have participated in staff recommendations and reviewed tariffs. I have also been the Co-Case Coordinator and Case Manager for electric, water and sewer rate cases.

### **Case Participation Tammy Huber**

Date	Company	Type of Filing	Case No.
2011-2012	Missouri American Water Company	Customer Service and Business Operations Review	WR-2011-0337
January 2012	Taney County Water Company, LLC	Customer Service and Business Operations Review	WR-2012-0163
April 2012	Lakeland Heights Water Company, Inc.	Customer Service and Business Operations Review	WR-2012-0266
April 2012	Oakbrier Water Company, Inc.	Customer Service and Business Operations Review	WR-2012-0267
April 2012	R.D. Sewer Company LLC	Customer Service and Business Operations Review	SR-2012-0263
May 2012	The Empire District Electric Company – Water Operations	Customer Service and Business Operations Review	WR-2012-0300
June 2012	Chariton Valley Telephone Corporation	Universal Service Funds Report	NA
June 2012	Northeast Missouri Rural Telephone Company	Universal Service Funds Report	NA
October 2012	Seges Partners Mobile Home Park LLC	Customer Service and Business Operations Review	SR-2013-0112
December 2012	Cedar Green Land Acquisition, LLC	Certificate of Convenience and Necessity	WC-2013-0087
January 2013	Lincoln County Sewer & Water, LLC	Customer Service and Business Operations Review; Testimony	SR-2013-0321 & WR-2013- 0322
April 2013	BPS Telephone Company	Universal Service Funds Report	NA

Date	Date Company		Case No.	
May 2013	Alma Telephone Company	Universal Service Funds Report	NA	
May 2013	Windstream Communications	Universal Service Funds Report	NA	
May 2013	Citizens Telephone Company	Universal Service Funds Report	NA	
August 2013	Roy-L Utilities, Inc.	Customer Service and Business Operations Review	WR-2013-0543 & SR-2013- 0544	
June 2014	KCP&L Greater Missouri Operations Company	Staff Recommendation	EO-2014-0355	
2014-2015	Kansas City Power & Light Company	Co-Case Coordinator	ER-2014-0370	
April 2016	Kansas City Power & Light Company	Staff Recommendation	ET-2016-0268	
April 2016	KCP&L Greater Missouri Operations Company	Staff Recommendation	ET-2016-0268	
November 2016	Kansas City Power & Light Company	Testimony	ER-2016-0285	
2016-2017	Kansas City Power & Light Company	Case Manager	ER-2016-0285	
February 2018	Union Electric Company d/b/a Ameren Missouri	Testimony	EO-2015-0055	
August 2018	Union Electric Company d/b/a Ameren Missouri	Testimony	EO-2018-0211	
December 2018	KCP&L Greater Missouri Operations Company	Staff Report	EC-2019-0109	
January 2019	Union Electric Company d/b/a Ameren Missouri	Staff Report	EC-2019-0121	
June 2019	Spire Missouri Inc. d/b/a Spire	Staff Report	GC-2019-0331	
July 2019	Missouri American Water Company	Staff Report	WC-2019-0324	
August 2019	Kansas City Power & Light Company/KCP&L Greater Missouri Operations Company	Staff Rebuttal Report/Testimony	EO-2019-0132	

Date	Company	Type of Filing	Case No.
November 2019	Kansas City Power & Light Company	Staff Report	EC-2020-0088
February 2020	The Empire District Electric Company	Staff Report	EC-2020-0183
March 2020	Missouri American Water Company	Staff Report	WC-2020-0194
April 2020	Spire Missouri Inc., d/b/a Spire	Staff Report	GC-2020-0201
April 2020	Evergy Missouri West, Inc., d/b/a Evergy Missouri West	Staff Report	EC-2020-0252
July 2020	Union Electric Company d/b/a Ameren Missouri	Analysis	EE-2019-0382
August 2020	Missouri American Water Company	Staff Report	WC-2020-0407
October 2020	Spire Missouri, Inc., d/b/a Spire	Staff Investigation Report	GO-2020-0182
December 2020	Evergy Missouri West, Inc., d/b/a Evergy Missouri West	Supplemental Staff Report	EC-2020-0252
April 2021	All Utilities	Cold Weather Event Report	AO-2021-0264
May 2021	Union Electric Company d/b/a Ameren Missouri	Staff Report	EC-2021-0285
June 2021	Spire Missouri, Inc., d/b/a Spire	Tariff Issue Review – Rate Case	GR-2021-0108
July 2021	All Utilities	Working Case Covid- 19 Pandemic Emergency Report	AW-2020-0356
August 2021	Missouri American Water Company	Analysis	WC-2021-0075
September 2021	Union Electric Company d/b/a Ameren Missouri	Staff Direct Testimony Report	ER-2021-0240
September 2021	Union Electric Company d/b/a Ameren Missouri Gas	Staff Direct Testimony Report	GR-2021-0241
November 2021	Missouri American Water Company	Staff Report	WA-2022-0049

#### cont'd Tammy Huber

Date	Company	Type of Filing	Case No.
January 2022	Spire Missouri, Inc., d/b/a Spire	Staff Report	GC-2022-0137
June 2022	The Empire District Electric Company d/b/a Liberty Utilities	Staff Report	EC-2022-0291
June 2022	Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc., d/b/a Evergy Missouri West	Analysis	EE-2022-0071
November 2022	Spire Missouri, Inc., d/b/a Spire	Analysis	GR-2022-0179
January 2023	Union Electric Company d/b/a Ameren Missouri	Analysis	ER-2022-0337
March 2023	Spire Missouri, Inc., d/b/a Spire	Staff Report	GC-2023-0261
April 2023	Spire Missouri, Inc., d/b/a Spire	Staff Report	GC-2023-0283
June 2023	Confluence Rivers Utility Operating Company, Inc.	Staff Report	SA-2023-0215
April 2023– December 2023	Confluence Rivers Utility Operating Company, Inc.	Co-Case Manager	WR-2023-0006
October 2023	Missouri American Water Company	Staff Report	WA-2023-0434
October 2023	Confluence Rivers Utility Operating Company, Inc.	Staff Report	SA-2023-0437
December 2023	Union Electric Company d/b/a Ameren Missouri	Staff Report	EC-2024-0108
March 2024	Union Electric Company d/b/a Ameren Missouri	Staff Report	EC-2024-0217

Case No. ER-2024-0189

**SCHEDULE TH-d2** 

HAS BEEN DEEMED

**CONFIDENTIAL** 

IN ITS ENTIRETY

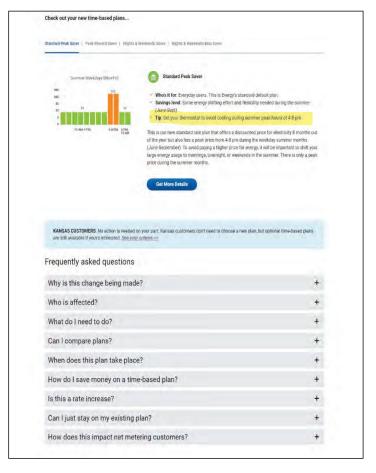
#### Full Page



# Campaign Website Landing Page

Audience: Mo Residential customers Launched Date: June 2023





# Out of Home - Billboard

Audience: Mo Residential customers Date: June-October 2023

# Missouri is moving to time-based rate plans this fall.

Learn more at evergy.com/NewPlans

>> evergy

# Digital Banner Ads

Awareness Ad









Audience: Missouri Residential

customers

Send Date: June-October 2023

# **Print Advertising**

Missouri Newspapers and Select Church bulletins Send Date: July 2023

Newspaper Print Ad

#### Church Bulletin Ads

>> evergy

Missouri is moving to time-based rate plans this fall.

Pick your new plan by October at evergy.com/PickPlan



# Place-Based Out of Home

(Located in places like grocery stores, laundromats, hair solans)

Audience: Mo Residential Customers Send Date: July - September 2023

Take-One Brochure

In-Store Banner/Sign

# Missouri is moving to time-based electric rate plans this fall.

Missouri customers will have a choice of **four new rate plan options**. Evergy is here to help you understand your options and choose the rate plan that best fits your household.

Pick your new plan by October and learn more at evergy.com/Time

Why is Missouri changing to time-based rates?

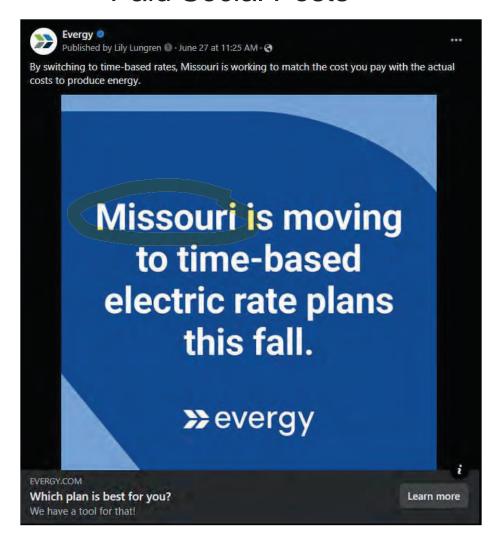
Timing is everything when it comes to energy costs. Time-based rates match the cost you pay with the actual cost to produce energy. With time-based rate plans, you'll pay less for energy during off-peak times, when demand for energy is lower, and more for energy used during the peak hours of 4-8 pm.







# **Paid Social Posts**



Audience: Mo Residential customers

Send Date: June-July 2023

# **Billing Communication**

July Bill Insert

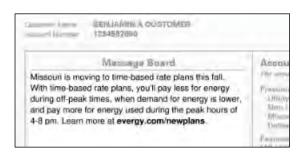




Audience: Mo Res with paper billing

Send Date: July 2023

#### July Bill Message



Case No. ER-2024-0189 Schedule TH-d3 Page 7 of 39

# **Billing Communication**

August Bill Insert

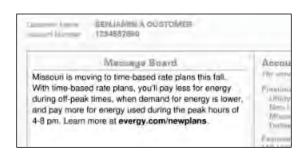
# It's time to choose your new time-based rate plan. Missouri is changing how electric rate plans work this Fall, so Evergy has introduced four new rate plan options to fit your household needs. If you have not selected a new plan by October, you will be moved to the Standard Peak Saver plan. Choose your new plan now! Select your time-based plan before October by going to evergy.com/TimePlans

#### Standard Why is Missouri changing to Peak. time-based rates? Saver The Missouri Public Service Commission has ordered Missouri utilities, including Evergy, to transition to Rewards mandatory time-based rate plans. The goal of timebased rates is to match the costs you pay with the actual cost to produce energy. With time-based rate plans, you'll pay less for energy used during off-peak Nights & times, when demand for energy is lower, and more for Weekends energy used during the peak hours of 4-8 pm. \*No Peak hours on holidays and weekends. Lower overnight price With time-based rate plans, you can take advantage Nights & of discounted off-peak pricing by shifting your larger Weekends appliance usage, like dishwashers and clothes drying, to off-peak hours. 📙 Peak hours (\$59) 🏻 Saver hours (\$\$) 📋 Super Saver hours (\$)

Audience: Mo Res with paper billing

Send Date: August 2023

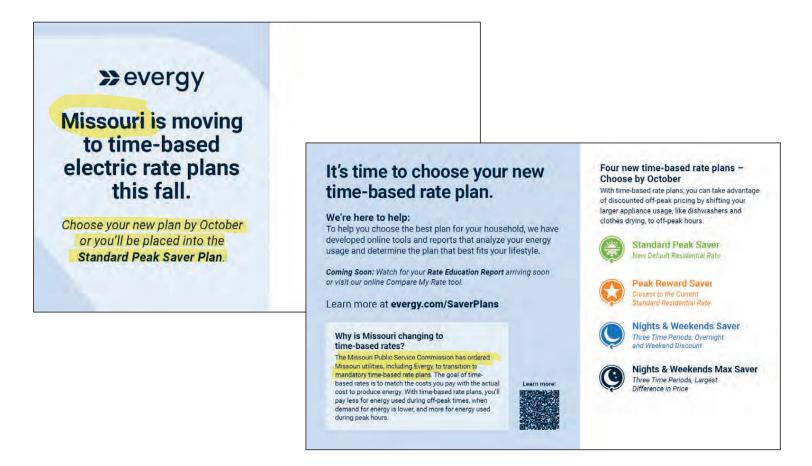
#### August Bill Message



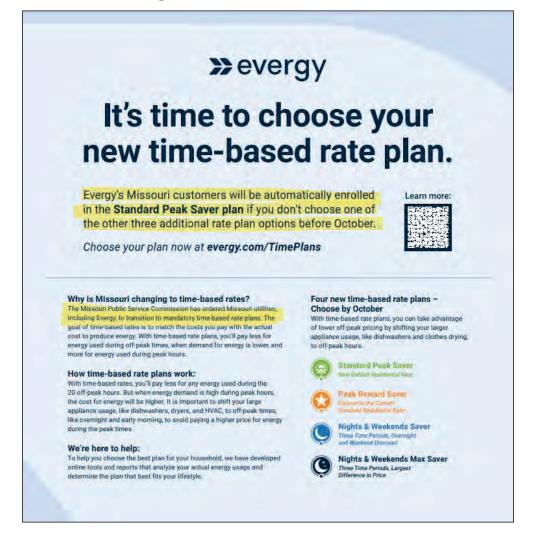
# **August Customer Postcard**

Audience: All Missouri Residential Customers

Send Date: August 7-15, 2023



# August Newspaper Ad



Missouri Newspapers Send Date: August 2023

# Retargeting Digital Banner Ads





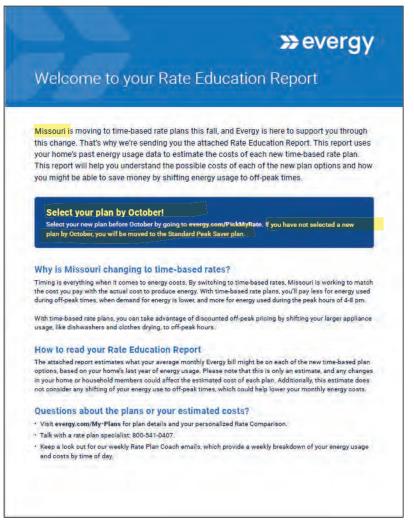






Digital banners Audience: anyone who went to evergy.com TOU pages Send Date: July – October 2023

# Cover Letter Insert in the Rate Education Reports





Letter with the Rate Education

Paper Report

Audience: All Missouri

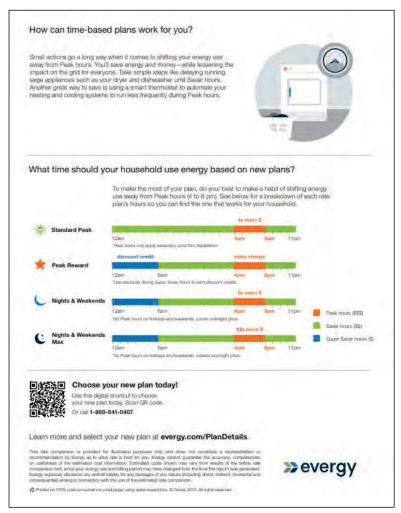
customers

Send Date: August 15-31, 2023

# Rate Education Reports Paper Version

Audience: All Missouri customers Send Date: August 15-31, 2023





# Rate Education Reports Email

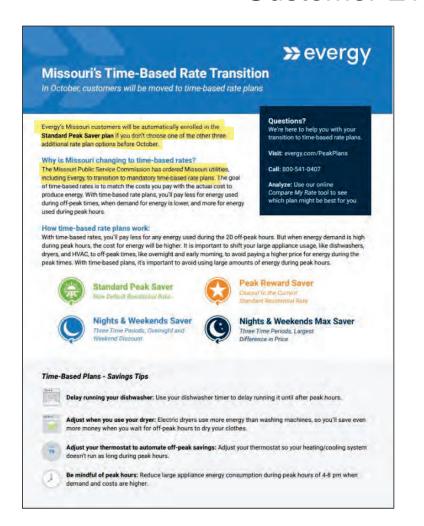




Audience: All Missouri customers with emails Send Date: August 16-31st, 2023



## **Customer Event Handout**





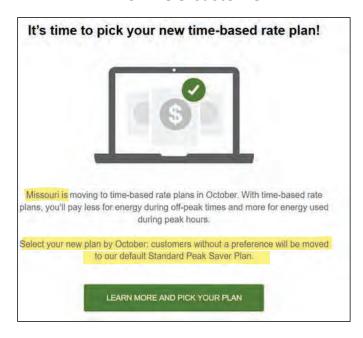
# Weekly Energy Analysis Emails - Promotion Pod

Promotional pod in the weekly energy analysis emails

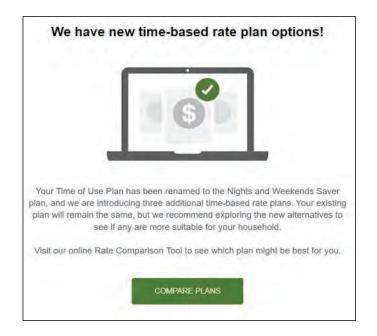
Audience: ~300,000

Send Date: August – October, 2023

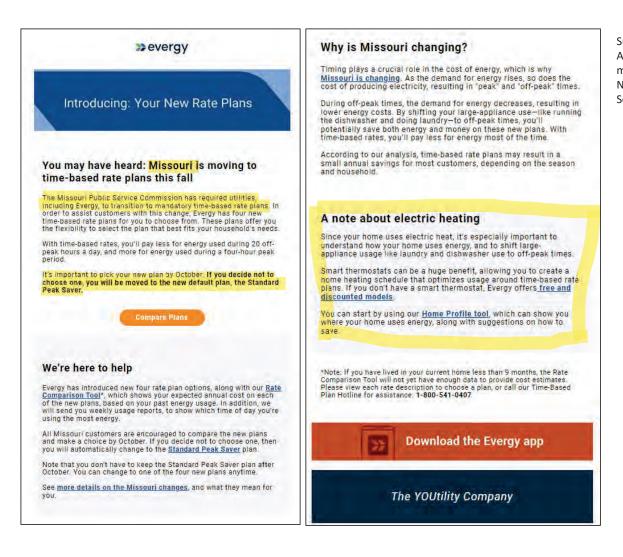
## Non-TOU customer



## Customers on TOU Pilot

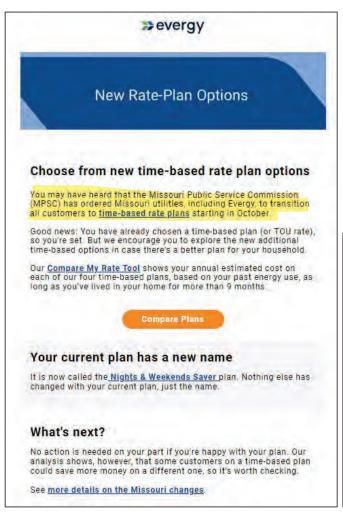


# All Mo Customers: August Email



Subject: Missouri, it's time to pick your new rate plan Audience: Mo Residential (excluding already on TOU, net metering, solar sub, non-AMI), ~400,000 Note: electric heat pod only shows for space heating customers Send Date: August 2, 2023

# Pilot TOU Customers: August Email



Subject: Are you on the best plan for your home

Audience: Mo Residential that are already on a TOU plan prior to Jan 1, 2023, ~8,000

Note: electric heat pod only shows for space heating customers

Send Date: August 2, 2023



## >> evergy

## Introducing: Your New Rate Plans

#### New plans are here

You may have heard that the Missouri Public Service Commission (MPSC) has ordered Missouri utilities, including Evergy, to transition all customers to <u>time-based rate plans</u> starting in October.

To support customers in this change, four new rate plans have been created to reflect the actual cost of energy, which varies throughout the day depending on demand.

Please look for your Rate Education Report, coming to you by postal mail in August, which will contain more information on your home's energy use, along with which new rate plan will be best for your home.

#### What does this mean for me?

This means that all customers now have the opportunity to select from four new plans, designed to provide lower prices for the majority of the day. However, it's important to choose a plan by October. If no selection is made by that time, you will be moved to the Standard Peak Saver plan.

Keep in mind that this may not be the most cost-effective option for your specific needs. We recommend you explore your rate-plan options with our <u>Rate Comparison Tool</u> and make an informed choice before the October deadline.

Compare Plans

#### How do I change my plan?

If you need help, we are here to assist you.

- . Change your plan online before October
- Call our special hotline at 1-800-541-0407 from 7 am to 5 pm Monday through Friday
- In Kansas City, stop by our <u>Connect Center</u> for in-person assistance

We understand that time-based plans are a big change. Evergy is committed to providing the information and tools you need to save the most on these new plans.

See more details on the Missouri changes, and what they mean for you.

# Seniors & Low Income: August Email

#### A note about electric heating

Since your home uses electric heat, it's especially important to understand how your home uses energy, and to shift largeappliance usage like laundry and dishwasher use to off-peak times.

Smart thermostats can be a huge benefit, allowing you to create a home heating schedule that optimizes usage around time-based rate plans. If you don't have a smart thermostat, Evergy offers free and discounted models.

You can start by using our <u>Home Profile tool</u>, which can show you where your home uses energy, along with suggestions on how to save.

#### Suggestions to save on time-based plans

By shifting some of your energy use to off-peak times, you can pay lower rates of 75% or more compared to peak times. The more you shift, the more you save.

#### Laundry

- · Wash clothes on cold. They get just as clean and save energy
- · Run your dryer after 8 pm on weekdays, or on weekends

#### ishwashing

· Run full loads and wait until after 8pm on summer weekdays

#### Heating and cooling

- Adjust your thermostat to cool your home a few degrees lower before peak hours begin to delay using the AC when energy is more expensive.
- In winter, warm your home a few extra degrees before peak hours begin.

You can also check out this chart to understand which appliances tend to use the most electricity in your home.

Energy Use Chart

\*Note: If you have lived in your current home less than 9 months, the Rate Companison Tool will not yet have enough data to provide cost estimates. Please view each rate description to choose a plan, or call our Time-Based Plan Hotling for assistance: 1-800-541-0407

25

Download the Evergy app

Subject: This Fall: New rate plan options

Audience: Mo Residential seniors and low income,

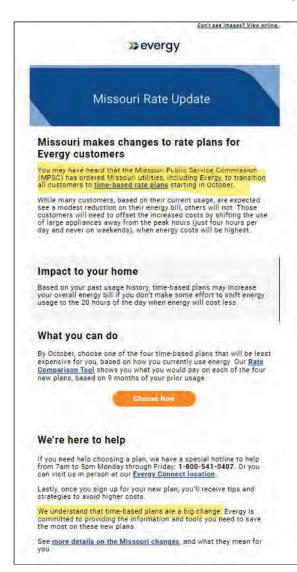
~70,000

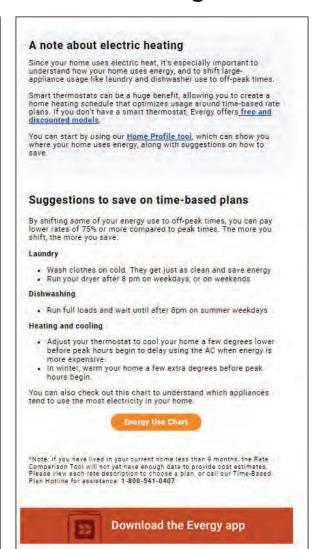
Note: electric heat pod only shows for space heating

customers

Send Date: August 10, 2023

# Non Saver: August Email

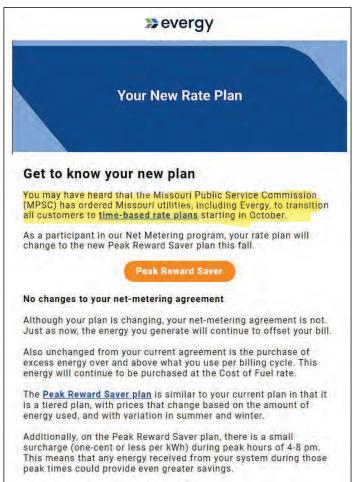




Subject: Important updates regarding your Evergy rate plan Audience: Mo Residential who are not expected to save on a new TOU plan,

Note: electric heat pod only shows for space heating customers Send Date: August 14, 2023

# Net Metering: August Email



Subject: Your new rate plan is coming soon

Audience: Net-metering ~6,000

Note: electric heat pod only shows for space heating customers

Send Date: August 25th



# Solar Subscription: August Email



Subject: Your new rate plan is coming soon Audience: Solar Subscription Customers ~900

Note: electric heat pod only shows for space heating customers

Send Date: August 23<sup>rd</sup>

## Plan changes in Missouri

You may have heard that the Missouri Public Service Commission (MPSC) has ordered Missouri utilities, including Evergy, to transition all customers to time-based rate plans starting in October

As a participant in our Solar Subscription program, your rate plan will change to the new Peak Reward Saver plan this fall.

Peak Reward Saver

The <u>Peak Reward Saver plan</u> is similar to your current plan in that it is a tiered plan, with rates that change based on the amount of energy used, and with variation in summer and winter.

Additionally, on the Peak Reward Saver plan, there is a small surcharge (one-cent or less per kWh) during peak hours of 4-8 pm. There is also a one-cent discount on energy used between midnight and 6 am.

## What's next?

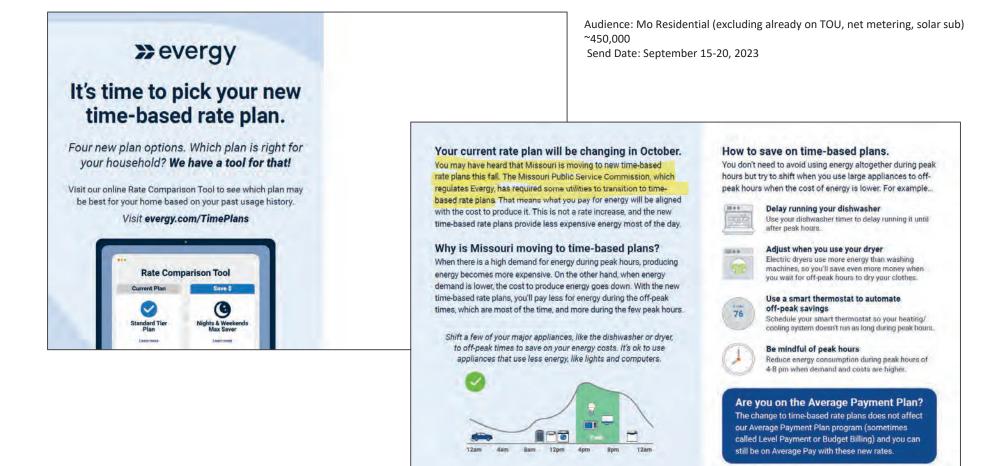
No action is needed on your part. Beginning with your October bill cycle, your new plan will be in effect.

## Can I pick one of the other time-based plans?

You may have heard that additional time-based plans are available to Missouri customers.

Currently, the Peak Reward Saver plan is the only plan compatible with Solar Subscription. However, we will reach out as other plan choices become available.

# Customer Postcard - September



# **Billing Communication**

September Bill Insert

## Missouri's Time-Based Rate Transition

In October, customers will move to time-based rate plans

Evergy's Missouri customers will be automatically enrolled in the **Standard Peak Saver plan** if you don't choose one of the other three additional rate plan options.

#### Choose your new plan now!

Select your time-based plan before October by going to evergy.com/TimePlans



Audience: Mo Res with paper billing

Send Date: September 2023

#### Bill Message

It's time to choose your new rate plan. Evergy's Missouri customers will be switching to time-based rate plans starting in October. With time-based rate plans, you'll pay less for energy during off-peak times and more for energy used during the peak hours. Select your new plan at evergy.com/NewPlans.

#### Why is Missouri changing to time-based rates?

The Missouri Public Service Commission has ordered Missouri utilities, including Evergy, to transition to mandatory time-based rate plans. The goal of time-based rates is to match the costs you pay with the actual cost to produce energy. With time-based rate plans, you'll pay less for energy used during off-peak times, when demand for energy is lower, and more for energy used during peak hours.

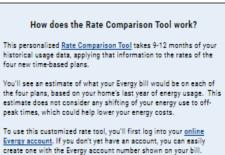
#### How time-based rate plans work:

With time-based rates, you'll pay less for any energy used during the 20 off-peak hours. But when energy demand is high during peak hours, the cost for energy will be higher. It is important to shift your large appliance usage, like dishwashers, dryers, and HVAC, to off-peak times, like overnight and early morning, to avoid paying a higher price for energy during the peak times.

# Which plan is right for your household? We have a tool for that! Visit our online Rate Comparison Tool' to see which plan may be best for your home based on your past usage history. Visit evergy.com/TimePlans \*\*M Read 9 months of usage history of your current borne is needed to use the Rate Comparison Tool Current Plan Save S Standard Tier Plan Nights & Weekends Max Saver

# All MO: September Email





## Pick a plan that fits your home

Each of the four plans has various peak and off-peak pricing periods. On all plans, you can avoid the higher energy costs during peak hours by shifting large appliance use to off-peak periods.

If you are willing to make a bigger effort to shift usage, plans with the largest price difference can potentially save you more.

Here are the four plans in order of the lowest difference in cost between peak and off-peak hours, and the largest difference.

#### Peak Reward Saver

Closest to the current standard residential rate, with the lowest price difference between time periods



This is our default residential rate plan if you don't choose a plan by October



Three time periods with different prices, with an overnight and weekend discount

Nights & Weekends Max Saver

Three time periods with different prices, with the highest difference in prices between time periods



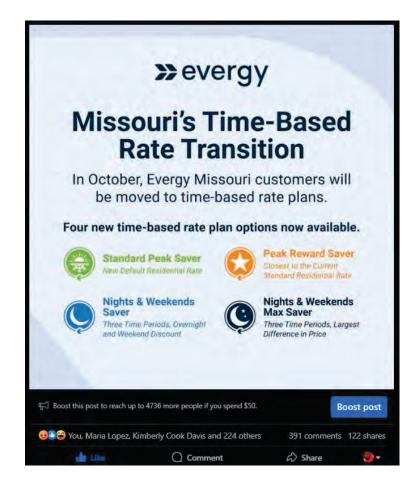
Subject: Action Needed: It's time to choose your new plan Audience: Mo Residential (excluding already on TOU, net metering, solar sub, non-AMI), ~320,000 Note: electric heat pod only shows for space heating

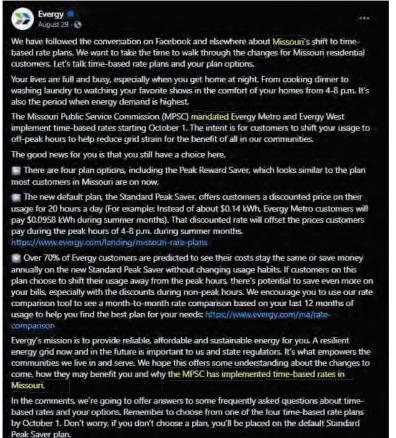
Send Date: September 2023

customers.

# **Organic Social Post**

Send Date: September 2023

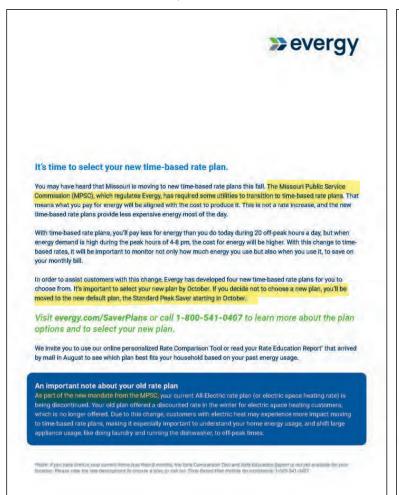


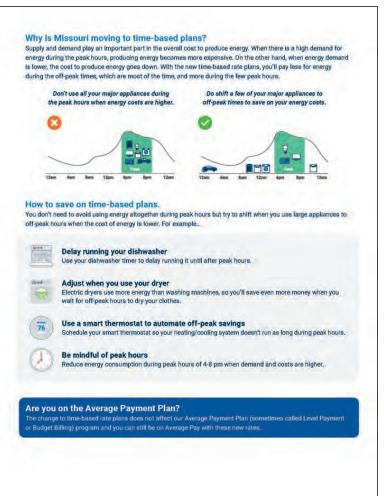


# Electric Heat Customers: September Letter

Audience: Customers on the Space Heating Rate ~103,749

Send Date: September 5-15, 2023

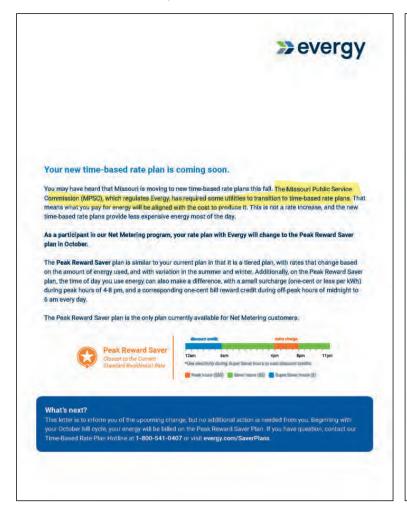


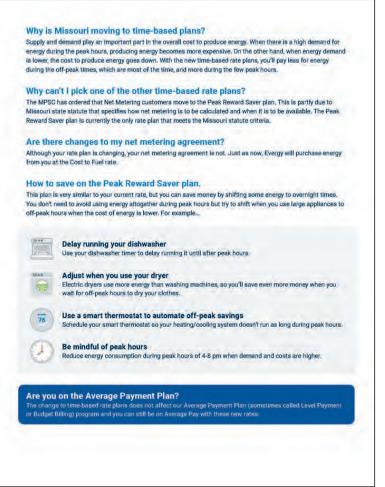


# Net Metering Customers: September Letter

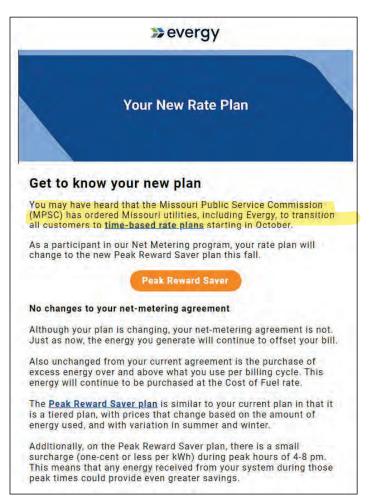
Audience: Customers on the Net Metering Rate ~6,766

Send Date: September 5-15, 2023





# Net-Metering: September Email



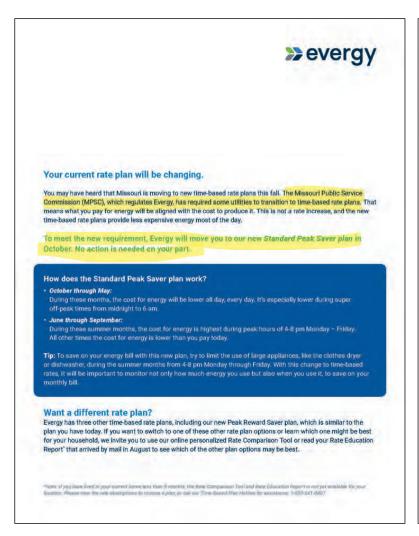
Subject: Your new rate plan is coming soon

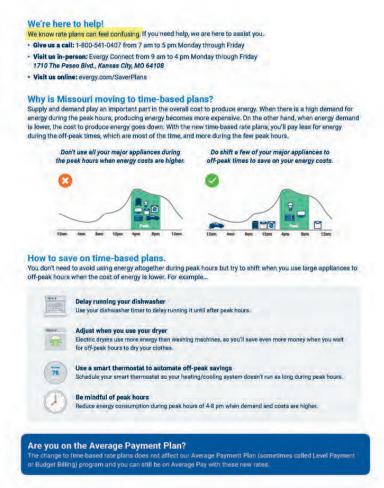
Audience: Resend to non-opens from August: Net-metering, ~3,000 Note: electric heat pod only shows for space heating customers

Send Date: September 2023



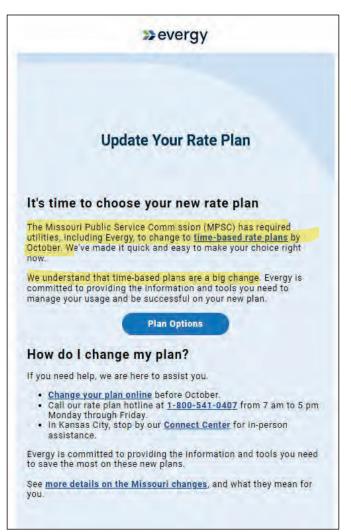
# Low Income and Seniors: September Letter





Audience: Customers identified as lower income or a senior ~187,293 Send Date: September 5-15, 2023

# Seniors & Low Income: September Email





Subject: Action needed: Update your rate plan

Audience: Mo Residential seniors and low income, ~70,000

Note: electric heat pod only shows for space heating

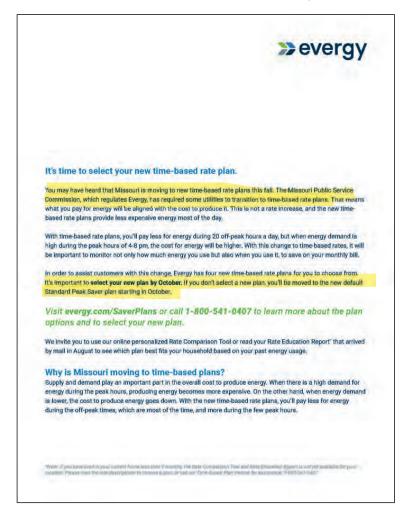
customers

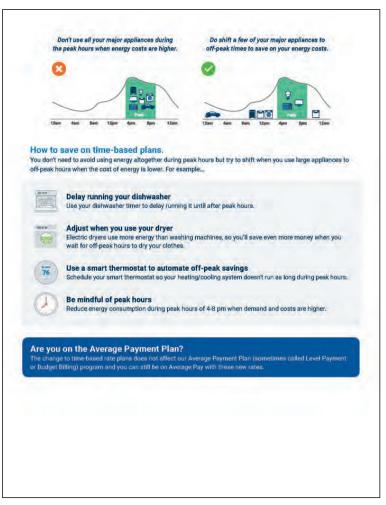
Send Date: September 2023

# Non-Digital Customers: September Letter

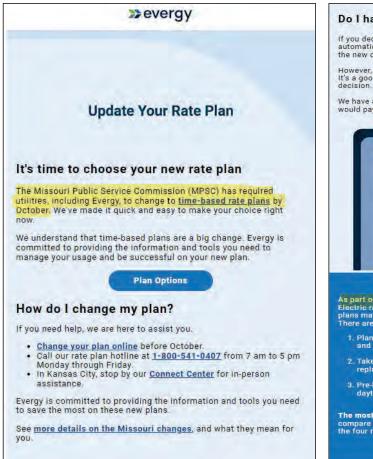
Audience: Customers identified at non-digital ~32,708

Send Date: September 5-15, 2023





# Non-Saver: September Email





Subject: Action Needed: Update your rate plan

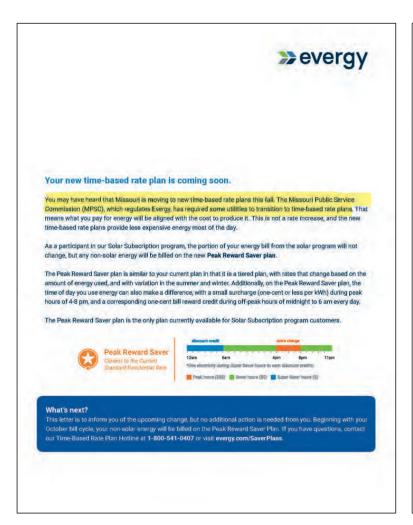
Audience: Mo Residential who are not expected to save on a

new TOU plan, ~70,000

Note: electric heat pod only shows for space heating customers

Send Date: September 2023

# Solar Subscription Customers: September Letter





Audience: Customers on Solar Subscription Program ~700 Send Date: September 5-15, 2023

# Solar Subscription: Email



Subject: Your new rate plan is coming soon

Audience: Solar Subscription Customers ~600. Resend to customers

who did not open in August Send Date: September 2023

## Plan changes in Missouri

You may have heard that the Missouri Public Service Commission (MPSC) has ordered Missouri utilities, including Evergy, to transition all customers to time-based rate plans starting in October.

As a participant in our Solar Subscription program, your rate plan will change to the new Peak Reward Saver plan this fall.

Peak Reward Saver

The <u>Peak Reward Saver plan</u> is similar to your current plan in that it is a tiered plan, with rates that change based on the amount of energy used, and with variation in summer and winter.

Additionally, on the Peak Reward Saver plan, there is a small surcharge (one-cent or less per kWh) during peak hours of 4-8 pm. There is also a one-cent discount on energy used between midnight and 6 am.

## What's next?

No action is needed on your part. Beginning with your October bill cycle, your new plan will be in effect.

## Can I pick one of the other time-based plans?

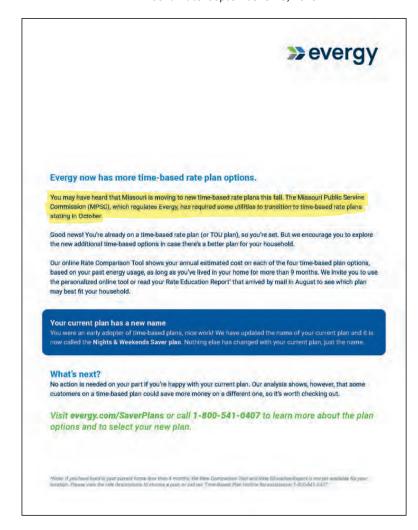
You may have heard that additional time-based plans are available to Missouri customers.

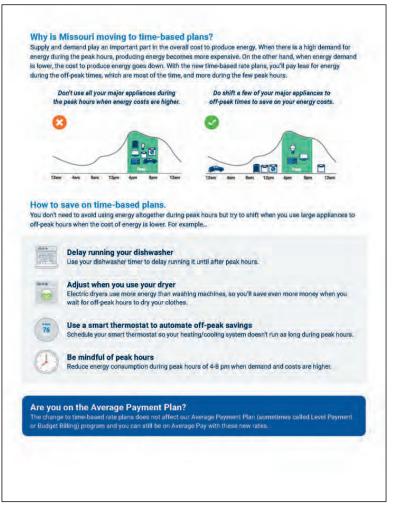
Currently, the Peak Reward Saver plan is the only plan compatible with Solar Subscription. However, we will reach out as other plan choices become available.

# TOU Pilot Customers: September Letter

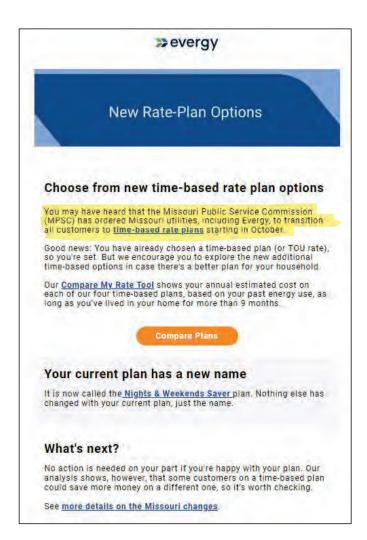
Audience: Customers who participated in the TOU Pilot Program ~7,000

Send Date: September 5-15, 2023





# Pilot TOU Customers: September Email



Subject: Are you on the best plan for your home

Audience: Mo Residential that are already on a TOU plan prior to Jan 1, 2023, ~3,000

Note: electric heat pod only shows for space heating customers

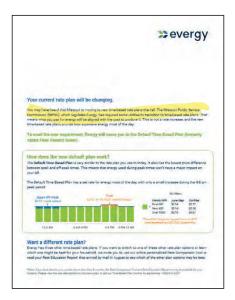
Resend to non-opens from August Send Date: September 2023

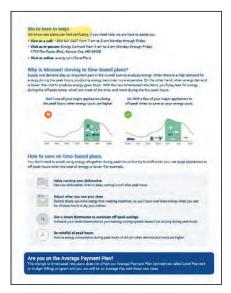


# Request for Information: Packet Mailed by Request

Audience: Customers who requested to be sent additional information

Send Date: August - Present









# Radio and Streaming Audio

Audience: Missouri Radio Stations, Missouri streaming audio customers Live: September 2023

#### Announcer-read spot

VO: Hey, [Radio Talent Name], here. If you're a Missouri resident like me, things are changing with your energy bill. That's because in October, Missouri is being mandated to move to time-based rate plans.

So what's that mean for us? Well, due to demand, we'll pay more for energy during peak hours. BUT, during the other 20 offpeak hours, we'll actually pay less.

Evergy has four time-based rates to help make the switch. They'll even recommend the best plan for you based on your usage history.

Learn more at evergy.com/myrate.

## Produced spot

VO: Hey Missouri, have you heard? Missouri electric utilities, including Evergy, are being mandated to move to time-based rates beginning this October.

So what's that mean for you? Well, to help reduce the strain on the power grid you'll pay more for energy during peak hours. BUT, during the other 20 off-peak hours, you'll actually pay less

Evergy has four time-based rates to help Missouri residents make the switch. To find the plan that best fits your lifestyle, check out our personalized "Rate Comparison" tool at evergy.com/myrate.

Consumer Comment No.	Date Filed	City	State	Consumer Comments
P202400287	11/30/2023	St. Joseph	МО	The TOU rates are discrimination against all-electric based customers who will seeing large increases in their bills. I have an all-electric heat pump and it is not designed to be off for 4 hours during peak times like the company wants. These plans do not have the customers in mind and none of these companies have any idea what they're doing. I have testified in federal cases regarding energy matters and know what I'm talking about and these rates are not good for anyone.
P202400256	10/5/2023	n/a	МО	Evergy has had a lot of changes lately. Many people don't understand. Too many changes all at one time. The State is allowing/requiring too many last minute changes. They are affecting periods not in at the time. Tough on everyone especially the disabled like myself. They shouldn't get the increase with the Time of Use as an already big change.
P202400254	10/3/2023	Weatherby Lake	МО	I object to any new price increases for Evergy for any reason. They say the increase may be as little as a penny. We live in the city of Weatherby Lake, MO which gets a 10% lug added to our electrical bill just for Weatherby Lake. So every cent Evergy increases my bill, there is another 10% added to my bill. Another question I have is "Why is Evergy advertising on tv?" We have no choice but to use Evergy and why should they be spending money to advertise? Further, if Evergy wants to save money, they can quit sending out and paying postage for those stupid letters telling me how much electricity I have used vs my neighbors. Evergy is a monopoly that needs to mind it's own spending and get out of my purse. I object!
P202400247	9/29/2023	St. Joseph	МО	"I am on a very low fixed income and I feel like these new rate plans are going to hurt me. These disproportionately effect the poor. Those of us on disability should receive some kind of discount. I have a very small home and live alone and this has affected me.  Missouri Public Utilities Commission,
P202400242	9/29/2023	Weston	МО	Your goal your only goal is to keep prices low for us Missourians and keep us on a path to enrich our lives. Well you have failed, and miserably so. Why would you deny KCP&L the right to raise our rates for years, then this year give them a way to murder our rates. 4X's what our former plan was is now the norm. Not only that it is time based rates so it kills us because Missouri kids get home at 3:30pm and parents get home at 5:00pm and now we can't run an air conditioner or even heat our homes till 8pm without a major surcharge! That is an outrage and I will look for every possible way to replace every single one of you on the MPUC.
P202400241	9/28/2023	Gower	МО	Fellow Missourian (co) Customer called stating that it seems like they're screwing the public and not helping us. No matter what he does his rates are going up. Everything has gone up in price.  Just wanted to add my opinion of the new Evergy time-based rate plans migration.
P202400239	9/26/2023	St. Joseph	МО	I totally agree with MO Representative Dean VanSchoiack's letter that he sent you.  It was posted on FaceBook and gave your email address to remind patrons to email you with what they think of the new plans. (see attached pdf)
P202400238	9/26/2023	Fillmore	МО	I am writing to request that we, Evergy customers, can keep our current plans. I had no idea that five people had the power to force us to lose our current rate plan, tell us when we should and should not use our appliances and air-conditioners. The people on fixed incomes, the elderly, the impoverished will feel the brunt of this "big-brother" power move. Reconsider placing yet another financial burden on your fellow Missourians.

Consumer Comment No.	Date Filed	City	State	Consumer Comments
P202400237	9/26/2023	Saint Joseph	МО	This has to be repealed for the sake of working families. You come home from work around 5 pm, hot and tired from working all day and the power company is going to take advantage of you by charging you more for the electricity. If that is right you do not know wrong. Working mothers come home need to cook dinner, and get a load or two of washing done. She is tired and needs to get things done and the power company is going to take advantage of her by charging her more for the electricity she needs to use to keep the family running. Again if that is right you do not know wrong. Please reconsider your plan.
P202400228	9/22/2023	DeKalb	МО	Thanks for listening to my grumbling.  I'm wanting to let you know, I'm very confused, and disappointed with your imposed rate changes, and I do not approve of the mandated "time of use" rates that you have mandated to the customers "me" of Evergy!  I'm asking that you allow Evergy to keep their current rate plans and allow users to opt- in to the "time of use" rate plans if they choose to!  Thank You
P202400227	9/22/2023	Country Club	МО	Missouri Public Service Commission  My wife and I are adamantly opposed to the "time of use" rate changes being mandated by MPSC.  This has been extremely confusing for most people, especially senior citizens like us. We feel the Commission has overstepped their bounds and don't have the best interests of consumers in mind.  We strongly recommend you withdraw this mandate.
P202400223	9/21/2023	Blue Springs	МО	I have a few concerns about the Evergy proposed tier rate system. First, their own website will not allow me to review or pick a plan because their system shows "insufficient information". Hmm, I have lived here over 12 years, there should be plenty of records of electrical usage. Second, if there is insufficient information, how are they going to properly charge me for "peak time" usage? Random numbers? (see attached pdf)
P202400220	9/20/2023	St. Joseph	МО	I am a resident of St. Joseph, MO and a customer of Evergy at my personal home as well as a rental house. I am totally opposed to any mandate so-called mandate to have a "time of use" rate imposed on my home. I do not have one of the NEST thermostats and do not like the idea of a public utility having control over my heating and cooling options. I am confused and disappointed that we even have to comment on any rate changes!!
P202400219	9/20/2023	Cosby	МО	To whom it may concern,  With the upcoming mandated change in rate plans that is being required by the PSC, it is going to cost many Missourians, my self included, more money who rely on all electric heating and cooling. The benefit to requiring this change for those all electric customers will be marginal. The phrase "benefit at other's expense" comes to mind.  I urge the psc to allow Evergy to keep the all electric plan for those customers that are currently on it. There is absolutely
				zero benefit that TBRP's will have for these customers besides costing them more to provide heat when needed most.  Thanks

Consumer Comment No.	Date Filed	City	State	Consumer Comments
P202400216	9/19/2023	St. Joseph	МО	I received a notice from Evergy stating that the all-electric plan which we have been on for nearly 16 years is going to be eliminated, and we will be forced onto a time-based rate plan. I have checked all four of these new time-based plans, and we will end up paying much for electricity no matter which plan we choose. (See attached pdf)
P202400206	9/18/2023	Carrollton	МО	The reason for this letter is I'm concerned with the time of use plans Evergy is coming out with that you seem so happy to mandate. (see attached pdf)
P202400200	9/15/2023	Glasgow	МО	Do to your decision Evergy says they have been forced to go to a time based rate energy rate. This should be highly illegal, A company should not be able to charge different rates for the same energy just because of the time the energy is used. This is price gouging, and is immoral. Who ever came up with this plan to force Missouri citizens to be forced into this energy plan should be removed from office immediately. I'm asking you to do the right thing here. This should not be forced on anyone. Especially in this current inflation and economy.
P202400198	9/14/2023	Mount City	МО	To Whom It May Concern: Why are we about to regulate the use of electricity in private homes? Most homes are two family income homes now and the typical time to be at home is between the hours you have told our electric company to charge us up to 4 times more for usage. Are we to be a 3rd world country? Sit in the dark, wash our clothes by hand and fold up the paper to fan ourselves in the evenings? This is America. We are to be free & prosperous. What you are doingespecially as unelected officials is wrong.
P202400191	9/14/2023	Maryville	МО	I am sending this letter to ask that you do not change the billing to time based. All of my family in Maryville are scared they will have to go without AC or Heat at some time due to the astronomical costs associated with the new structure. (see attached pdf)
P202400185	9/12/2023	Clinton	МО	Hello, I am writing today to express my concerns with the new time of rate plans. When rates go up from 4-8 PM this really affects a lot of people that work till 5. When I get off work it is time to start cooking. Everything we use to cook with requires power. To keep my bill from going up I am now going to have to make my kids starve until we can start cooking at 8 PM and then when the food is done it might be 9 or 10 pm. So my kids will have to stay up later at night getting less sleep which in turn is going to cause their grades to suffer at school due to lack of sleep. (see attached pdf)
P202400182	9/12/2023	St. Joseph	МО	What is going on with Evergy electric? They say we have to choose a plan that they say your mandating them to do. Between 4 and 8 they can charge up to 10 times more for electricity. In my opinion this is price gauging the public just because there is more demand for electricity at that time when people get off work. Need to look at Facebook, I think this problem is going viral and Evergy says you're making them do this. I wonder how many commissioners have stock in these utilities, Makes a person wonder
P202400179	9/8/2023	Blue Springs	МО	(co) Customer called stating that the rates have doubled over the past year. This is destroying the middle class. He feels trapped. They're one utility company around. They're using price to control when consumers use their electricity. They made it seem like they're designed to save you money.

Consumer Comment No. Date Filed City State Consumer Comments					
Consumer Comment No.	Date Filed	City	State	Consumer Comments	
P202400177	9/7/2023	Liberty	МО	Evergy is asking for me to choose between 4 plans now charging by the non-peak- peak hours and is penalizing people between hours of 4-8 pm. This is a monopoly rate hike as I don't have the ability to use another utility company that is competitive. It's almost organized crime as the rates can be as much as 10x more money when people are home the most. Evergy obviously have been irresponsible with their infrastructure and future plans to adopt to much costly renewable energy, so now the consumer is paying the bill for poor management decisions. Extreme profit shares, Extreme luxury offices and extreme wages are also some of the reasons we are now seeing this unfair practice. This peak time will only move once people adjust around the hours.	
P202400175	9/7/2023	Adrain	МО	I would like to voice my extreme disapproval for our commission allowing time based electric rates. Using a 4-8 pm time slot for the higher rate is detrimental to working families. Those are the only hours you have to get things done and kids to bed. You have benefited the welfare and social security customers at the expense of the working middle class. It does not cost more to generate electricity during certain times. The employees at the power plant make the same, the coal is the same, and many business shut down that would shift power from commercial to residential. This was a move that the only motive is profit. As officials representing the public, this was beyond a poor move for your people.	
P202400157	8/31/2023	Windsor	МО	But Evergy has been stuffing my bill with inserts about time-based rates taking effect in October. When I investigate these new rates, I find that my rate will increase over 300% between the hours of 4 and 8 pm.  I am retired and living on Social Security and my meager life savings. Where is my PUBLIC SERVICE commission when I need them? How can you allow this to happen and still sit on this commission? (see attached pdf)	
P202400152	8/31/2023	Warrensburg	МО	As a Missouri citizen I feel like you owe all of us an explanation on why you agreed to legalized price gouging in the form of time based rates? In what universe is commifornia a good example of how to do anything? (see atttached pdf)	
P202400142	8/31/2023	Dearborn	МО	I'd like to know if the same due diligence was done in Missouri as it was in Kansas in relation to Evergy's new rate hikes. And if it was, how did Missouri come to a different conclusion? It seems like Evergy was given carte blanche to do whatever they wanted.	
P202400128	8/25/2023	Platte City	МО	As a former VP of sales I would never present my customer with an array of confusion like Evergy has done. No one I have talked to understands the plans. (see attached pdf)	
P202400122	8/23/2023	Dearborn	МО	The fact that Evergy stockholders are excited about these new rate options tells me everything I need to know but quadrupling rates from 4-8 pm is going to hurt working people the most. I can not afford my utility bills already. (see attached pdf)	
P202400107	8/14/2023	Belton	МО	I am an Evergy customer that will be forcibly subjected to the policy changes coming this fall. Your vote to implement these changes far surpasses your duty as commissioners to simply ensure we have access to AFFORDABLE energy without overstepping your authority to telling us what behaviors we should or should not be modifying. This needs to be delayed indefinitely and I am calling upon you to reverse course immediately.	
P202400105	8/14/2023	OFallon	МО	My complaint is with the blatant overreach and incredible dishonesty of the Public Services Commission itself with regard to their unilateral, dictatorial decision to force time-of-use rates on the people of Missouri. (see attached pdf)  Case No. ER-2024-0189	

Consumer Comment No.	Date Filed	City	State	Consumer Comments
P202400100	8/11/2023	Belton	МО	I do not understand why we are being forced into these time of use rates. We needs government officials that are standing up for us! Not allowing all of this! (see attached pdf)
P202400099	8/9/2023	St. Joseph	МО	We are being forced to change our home electrical service plans by Evergy, and they are telling us that it is because of requirements of the PSC. (see attached pdf)
P202400098	8/9/2023	Clinton	МО	We were wondering what is the purpose of the new rate plans cince all of them raise our rates. We thought you were suppose to be looking out for the consumer.
P202400090	8/7/2023	Raymore	МО	Homeowners on an All Electric plan are going to see their rate under the Time Based plans nearly double. Simple math shows this. The justification for eliminating all electric rates is it helps other residential customers. This argument doesn't hold water. As an all-electric customer, I'm not polluting the environment burning wood, natural gas, or propane. Yet, I'm being punished. Why aren't the rates increasing for the largest consumers of energy—businesses? Missouri is lost.
P202400087	8/4/2023	Blue Springs	МО	(JP) "This new TOU is very confusing and difficult to understand for those of us who are not savvy with technology. Groceries, gas, mortgages and now utilities are going up but wages are not going up. I cannot work due to health issues. These increases have been going on for years and it isn't fair. This is a nightmare and not fair."
P202400086	8/4/2023	Blue Springs	МО	(JP) "I am disgusted on how Evergy and the PSC went about this new TOU rates. You are charging more during the times that most people use electricity. I just found out about this today through facebook. I have been trying to log onto my online account to see which plan works for me but I can't get on. They have gone about this the wrong way."
P202400085	8/4/2023	Calhous	МО	I am currently on Evergy's All Electric Rate. No matter which TOU rate plan I choose, I'm going to be paying a lot more, because they're eliminating the All Electric discount. If you're going to get rid of the discount for me, you should get rid of the discounts for commercial and business accounts, too. Yet they're not affected by this. If the goal is to reduce energy use, then everybody should be on the same playing field.
P202400029	7/10/2023	Lees Summit	МО	(tb) Steve is upset/opposed to the TOU rates. Says this is extraordinarily publicly stupid to make a decision like this when people are being reassessed on property taxes. This is being forced on them & is so dumb. He says he is speaking for thousands of people on his neighborhood facebook page who are upset about this.
P202400022	7/7/2023	Saint Joesph	МО	I cannot believe you would allow Evergy to have a rate increase and then allow this latest's scam too the public where we have to select some energy program by October. This selection only lines the pockets of the company by more than doubling the kilowatt cost between the the hours of 4-8PM. This is prime time for workers but as a retired person I will still be doubling my costs because I will not be turning off my air conditioner. (See attached)
P202400018	7/6/2023	Blue Springs	МО	(JE) Donna received notice on her billing statement about Time of Use rates starting in October. She does not agree with Time of Use rates & that I was able to explain Time of Use rates better than anyone else at Evergy she has spoke with.
P202400009	7/5/2023	Liberty	МО	(JP) "I don't understand why this TOU thing was approved by the Commission or why residential customers are taking the hit but businesses aren't being forced to do this. Why not charge everyone a flat rate? Evergy is a monopoly so I can't choose another provider. And they aren't even improving the infrastructure because there are frequent power outages and surges in my area b/c they overloaded the grid. Evergy keeps saying they're working on but still no improvement."

Consumer Comment No.	Date Filed	City	State	Consumer Comments
P202302304	6/30/2023	Elmo	МО	Your approval of evergys time stamped energy usage plans is absolutely ridiculous and too supportive of the corporation. There was no consideration of the people who pay those bills. This approval needs to be revoked. 4 plans with specific time to where your energy is more expensive is far too confusing for the general public and this is a money grab because they know people will not understand the criteria.
P202302301	6/29/2023	Oak Grove	МО	(JE) Jason called regarding bill message concerning Time of Use rates that will go into effect October 1st. Jason is against Time of Use rates & the rates approved in Evergy's last rate case. Does not think people should be penalized for peak usage when most work day jobs to come home and cook, clean, dishes, and normal everyday usage.
P202302285 P202302283	6/28/2023	NA Kansas City	мо	(co) Customer called asking if they're thinking about the working class. She stated that this is a 400% increase. This is just another burden. It's like we're pushing for more usage on one end and trying to cut it on the other end.  (JP) "It's not a free market when it comes to utility companies here so I don't have another choice other than Evergy. I don't want them telling me I am tired of accepting things I'm not happy with. I don't think it's right that we're being forced into these new rate schedule tiers."
CI202400303	9/20/2023		МО	Do to your decision Evergy says they have been forced to go to a time based rate energy rate. This should be highly illegal, A company should not be able to charge different rates for the same energy just because of the time the energy is used. This is price gouging, and is immoral. Who ever came up with this plan to force Missouri citizens to be forced into this energy plan should be removed from office immediately. I'm asking you to do the right thing here. This should not be forced on anyone. Especially in this current inflation and economy.
C202301046	6/29/2023		МО	Evergy's proposed "peak saver" utility use rate schedule with rate increases during "peak" hours will put most seniors and low income persons at a health risk of heat stroke as they propose to incur higher costs for running the air conditioner during the hottest time of day. This will force many to turn off the fans & a/c and suffer in the unbearable 94° temp with heat indexes of @ or over 100°.