

Exhibit No.:
Issue: TOU Engagement and Education
Witness: Katie R. McDonald
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Evergy Missouri Metro and Evergy
Missouri West
Case No.: ER-2024-0189
Date Testimony Prepared: August 6, 2024

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2024-0189

REBUTTAL TESTIMONY

OF

KATIE R. MCDONALD

ON BEHALF OF

EVERGY MISSOURI WEST

**Kansas City, Missouri
August 2024**

TABLE OF CONTENTS

I. EVERGY’S EFFORTS TO ENGAGE AND EDUCATE ITS CUSTOMERS REGARDING ITS TOU IMPLEMENTATION PLAN	3
II. SPECIFIC RESPONSES TO STAFF WITNESS HUBER AND OPC WITNESS KREMER	19
III. RESPONSE TO OPC WITNESS GEOFF MARKE	32

REBUTTAL TESTIMONY

OF

KATIE R. MCDONALD

Case No. ER-2024-0189

1 **Q: Please state your name and business address.**

2 A: My name is Katie R. McDonald. My business address is 1200 Main, Kansas City, Missouri
3 64105.

4 **Q: By whom and in what capacity are you employed?**

5 A: I am employed by Evergy Metro, Inc. I serve as Vice President of Public Affairs for Evergy
6 Metro, Inc. d/b/a as Evergy Missouri Metro (“Evergy Missouri Metro”), Evergy Missouri
7 West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”), Evergy Metro, Inc. d/b/a
8 Evergy Kansas Metro (“Evergy Kansas Metro”), and Evergy Kansas Central, Inc. and
9 Evergy South, Inc., collectively d/b/a as Evergy Kansas Central (“Evergy Kansas Central”)
10 the operating utilities of Evergy, Inc.

11 **Q: On whose behalf are you testifying?**

12 A: I am testifying on behalf of Evergy Missouri Metro and Evergy Missouri West
13 (collectively, the “Company” or “Evergy”).

14 **Q: What are your responsibilities?**

15 A: I lead the Public Affairs division, and have responsibility for the strategy and execution of
16 Corporate Communications, Marketing and Advertising, Research, Digital Strategy and all
17 digital tools (including the website, customer portals and app), and Social Impact functions.

1 **Q: Please describe your education, experience and employment history.**

2 A: I earned a journalism degree from the University of Missouri-Columbia and an MBA from
3 the Bloch School of Management at the University of Missouri-Kansas City. I am also a
4 graduate of the University of Idaho's Utility Executive Program. I have worked in various
5 positions in the Public Affairs division at Evergy since I joined the Company in 2007. Prior
6 to joining KCP&L (now Evergy), I worked in marketing and public affairs roles at two
7 integrated marketing communications agencies in Kansas City.

8 **Q: Have you previously testified in a proceeding before the Missouri Public Service
9 Commission ("Commission" or "MPSC") or before any other utility regulatory
10 agency?**

11 A: Yes. I recently filed testimony in File No. EC-2024-0092.

12 **Q: What is the purpose of your testimony?**

13 A: The purpose of my testimony is to respond to the direct testimony filed by Staff witness
14 Tammy Huber and OPC witness Lisa Kremer related to Evergy's engagement and
15 education efforts to implement the Time-of-Use ("TOU") rates approved by the
16 Commission in the Evergy's last general rate case. I will also briefly address the direct
17 testimony of OPC witness Geoff Marke regarding his recommendation for Evergy to
18 implement a TOU Public Service Announcement campaign.

1 **I. EVERGY’S EFFORTS TO ENGAGE AND EDUCATE ITS CUSTOMERS**
2 **REGARDING ITS TOU IMPLEMENTATION PLAN**

3 **Q: Before addressing specific comments in direct testimony of Staff witness Tammy**
4 **Huber and OPC witness Lisa Kremer, do you have any comments regarding their**
5 **direct testimony in which both witnesses allege that Evergy has not successfully**
6 **complied with the Commission’s Order in the Amended Report and Order in Case**
7 **Nos. ER-2022-0129 and ER-2022-0130 to implement a program to engage and educate**
8 **customers regarding Evergy’s TOU rates?**

9 **A:** Yes. It is imperative to clarify misperceptions regarding Evergy's implementation of the
10 education and outreach campaign that had an objective of educating customers in the lead-
11 up to the TOU transition period. Staff agrees that EMW’s TOU education plan was
12 successful in making customers aware of the TOU rates (Huber Direct, p. 3). In fact, Ms.
13 Huber points out that the April 2024 dashboard showed that 97% of customers were aware
14 of the new rate options and 87% were aware of the mandatory TOU rate change. (Huber
15 Direct, p. 8). Nevertheless, Staff makes the accusation that, “*Staff does not agree that*
16 *EMW has been effective in developing customer education and outreach materials, and*
17 *implementing a program to fully engage and educate its customers.*” (Huber Direct, pp.
18 3-4)

19 There are two parts to this complaint. First, whether Evergy has been effective in
20 developing customer education and outreach materials. Second, whether Evergy
21 implemented an effective campaign to fully engage and educate its customers regarding
22 the TOU rates. Staff and OPC fail to present evidence to dispute either and, actually, give
23 supporting details that Evergy indeed did both items. I plan to address both of these issues,
24 among others, throughout my testimony.

1 Staff, in its recent Complaint case, File No. EC-2024-0092, also makes the
2 argument that the customer education campaign should have started right after the
3 *Amended Report and Order* but *also* suggests that Evergy did not take the time to consider
4 their feedback before building the campaign. These are contradictory and I would suggest,
5 irreconcilable statements. Evergy took the latter approach and spent time developing a
6 campaign and hosted stakeholder feedback workshops, as requested by the Commission,
7 and still began the customer education and outreach campaign in June 2023, which was
8 seven months before the required date to have all customers transitioned to TOU. Evergy
9 was careful to develop the education materials, including online rate comparison tools, to
10 allow customers to understand the TOU rates, including the likely impact of the various
11 TOU options upon their bills, before the required transition in the fall of 2023.

12 Secondly, Staff and OPC's assertions that Evergy neglected to engage and educate
13 customers are unfounded. Contrary to their claims, the evidence indicates robust customer
14 engagement and continued growing education. Evergy's internal research, supplemented
15 by studies conducted by TrueNorth, underscores widespread awareness and understanding
16 of the TOU transition among customers. More than 90 percent of customers surveyed by
17 Evergy said they were aware of the transition to TOU rates and more than 70 percent
18 indicated they remembered seeing Evergy's communication on the topic. More than 30
19 percent of customers ended up selecting their rate plan before being transitioned and close
20 to 350,000 customers used the TOU Rate Comparison Tool. These numbers clearly show
21 customer engagement and education on the topic that resulted in the action we set out to
22 achieve. Awareness of the transition to TOU rates surpassed our goals for the campaign.

1 In addition, customers showed understanding of TOU rate features. When asked if
2 customers know the main features of TOU rates, such as they will pay more for electricity
3 during peak hours and less during off-peak hours, more than 60 percent of customers were
4 able to correctly understand TOU rate features. In fact, more than 40 percent of surveyed
5 customers expressed satisfaction with their level of knowledge on TOU rates and indicated
6 they need no further information on the topic. Whether the engagement was positive,
7 neutral, or negative, this undeniably signified active involvement. Given these indicators,
8 it is perplexing that Staff would insinuate that Evergy fell short of its obligations to engage
9 and educate customers regarding the TOU transition.

10 Evergy remains steadfast in its commitment to transparent communication and
11 proactive customer engagement. We trust that a thorough examination of the evidence will
12 affirm the efficacy of our educational efforts. In addition, Commissioner comments at
13 Agenda meetings and at the Evergy on-the-record presentations regarding TOU help to
14 demonstrate that Staff's allegations are without merit. See Schedule KRM-1.

15 **Q: Please explain the efforts of Evergy to engage and educate its customers regarding**
16 **the TOU Implementation Program.**

17 A: Evergy developed a comprehensive, multi-faceted, surround-sound outreach and education
18 campaign, strategically designed to engage and educate customers. The campaign included
19 multiple touchpoints, communication tactics and channels, and bilingual messaging in both
20 English and Spanish. In addition, Evergy conducted in-depth qualitative and quantitative
21 marketing research to help understand customers' reactions to the new TOU rate plans,
22 determine which TOU messages are the most impactful, tested rate plan names, and
23 conducted an analysis to pinpoint segments most affected by the transition. We developed

1 a campaign that would reach all Evergy customers while also prioritizing engagement
2 efforts for special customer groups including seniors, income-eligible individuals,
3 households relying on electric heating, and those less digitally inclined. In addition, we
4 engaged a third-party research firm to conduct quarterly surveys to help us gauge our
5 education efforts of awareness and understanding of the rates before and during the
6 campaign. Additionally, a monthly survey was launched to assess marketing campaign
7 performance. We shared the results of this work with Staff and OPC throughout the months
8 leading up to and during the campaign, making adjustments and changes based on their
9 feedback. Examples of these changes will be addressed later in my testimony.

10 At the time of Staff's initial Complaint filing, Evergy had just begun Phase 2 of our
11 five-phase education campaign. This campaign featured multiple ways in which we
12 engaged and educated customers and is one of the most comprehensive customer
13 campaigns in Evergy's history. Please refer to Schedule KRM-2 for a breakdown of the
14 campaign phases, along with our engagement tactics and education messaging, and
15 Schedule KRM-3 for a list of the engagement and education tactics by audience groups.
16 Below is a list of some of the engagement and education tactics Evergy utilized in the
17 campaign:

- 18 ▪ **Customer Outreach Events:** Evergy conducted more than 70 individual
19 outreach events, primarily targeting income-eligible and senior customers,
20 across the first three phases of the campaign. These events included both
21 those hosted by Evergy and those organized in collaboration with partner
22 agencies such as Raytown Christian Church and North Kansas City YMCA,
23 as well as numerous neighborhood associations and senior apartment
24 complexes. Evergy also ensured representation at events with
25 predominantly Spanish-speaking audiences by deploying Spanish-speaking
26 employees and actively engaging with Spanish-speaking communities.
- 27 ▪ **Food Pantries and Library Handout Distributions:** Evergy partnered
28 with food pantries and libraries throughout our service area to conduct
29 outreach events and distribute informational materials. More than 25 food

- 1 pantry locations received TOU handout materials to be included in food
2 boxes, and nearly 40 library locations were provided informational
3 materials to share with customers.
- 4 ▪ **Earned Media and Media Relations:** Evergy leveraged news media
5 channels to enhance awareness and understanding of the transition to TOU
6 rates. Articles and television segments provided detailed information about
7 the TOU plans, options available, and where customers could access further
8 assistance and information.
 - 9 ▪ **Direct Mail:** To ensure non-digital customers were engaged and educated,
10 Evergy sent multiple direct mails to customer homes. Many of these mailers
11 provided more detailed information on the change to TOU and rate plans.
 - 12 ▪ **Email:** Evergy used email to not only inform customers about their rate
13 options, but also as a tool to direct them to the Rate Comparison Tool and
14 to provide customers with detailed plan information once they had selected
15 their rate plan.
 - 16 ▪ **Bill Messages and Inserts:** Monthly bill inserts and messages were utilized
17 from June through December to progressively move customers from
18 awareness of the rate change to plan selection, offering savings tips and
19 detailed plan information.
 - 20 ▪ **Videos:** Evergy created 10 different videos to help support the campaign,
21 including an overview video, 4 videos for each rate plan, two informational
22 training videos (one in English and one in Spanish) and 3 videos for digital
23 ads to explain how TOU works. These videos were used on our website, in
24 paid digital ads, in emails, at outreach events and to help train agency
25 partners on TOU.
 - 26 ▪ **Website:** Evergy developed content on evergy.com to provide one hub with
27 information about why Evergy was moving to TOU rates, details on each
28 rate plan, and tips to help customers save money on TOU. In addition, the
29 website hosts our Rate Comparison Tool and Change My Rate tool to
30 provide personalized information for each customer.
 - 31 ▪ **Rate Comparison Tool:** This tool, crucial for helping customers
32 understand the bill impacts of new TOU plans, provides a breakdown of
33 expected costs based on past billing data, and resulted in a significant
34 increase in customer engagement throughout the campaign.
 - 35 ▪ **Mobile App:** Evergy integrated TOU rate plan information into the Evergy
36 app, enabling customers to access plan details, use the Rate Comparison
37 Tool, and sign up for a new rate directly through the app.

- 1 ▪ **Paid Search:** The Company used paid search to make it easier for
2 customers who were searching for TOU information to find our TOU
3 landing page and rate information pages.

- 4 ▪ **Radio and Streaming Audio:** As one of the Phase 1 awareness tactics,
5 Evergy used both traditional and streaming audio to encourage customers
6 to go to evergy.com to learn more about the new rate plans and pick a rate
7 by October.

- 8 ▪ **Newspaper Ads and Church Bulletins:** To reach non-digital and rural
9 audiences, Evergy utilized advertisements in local newspapers and church
10 bulletins, recognized as important information sources in rural areas.

- 11 ▪ **Billboards and In-Store Advertising:** To help gain broad awareness of the
12 change to TOU rates, Evergy used both billboards and in-store
13 advertisements, like grocery stores, to gain customer awareness and direct
14 them to evergy.com for more information.

- 15 ▪ **Rate Education Reports:** Evergy mailed customers a Rate Education
16 Report and sent a version by email. These reports provided customers a
17 personalized look at what each plan might cost based on the customer's own
18 past usage history. The reports also provided TOU educational savings tips.

- 19 ▪ **Welcome Kit:** A comprehensive welcome kit, including information about
20 peak and off-peak times, savings tips, and an informational refrigerator
21 magnet, was mailed to all customers to aid in understanding and savings
22 opportunities on their TOU plan.

- 23 ▪ **Assistance Agency Partner Trainings:** Evergy conducted multiple
24 training sessions with agency partners, particularly those serving the
25 income-eligible audience, enabling them to provide informed guidance to
26 their clients regarding rate options and mechanics.

- 27 ▪ **Handouts/Flyers:** Evergy developed flyers that were used at community
28 events, packed in food pantry boxes, available at local libraries, and mailed
29 to customers upon request.

- 30 ▪ **Connect Center:** Evergy used our in-person walk-in customer service
31 center to provide customers a place to ask additional questions about their
32 TOU rate options. Evergy dedicated a customer service agent to work a
33 special TOU table at the Connect center to provide education on TOU to
34 customers who had questions or wanted to explore rate options and select a
35 rate plan.

- 36 ▪ **Contact Center:** While all Evergy Customer Service Representatives
37 (CSRs) were trained to address TOU questions, a dedicated TOU phone
38 number and team of CSRs specially trained in TOU inquiries were
39 established, providing direct access to in-depth assistance for customers.

1 As you can see from the list of tactics, Evergy used both awareness tactics, direct-
2 to-customer tactics, and personalized tactics to fully engage and educate customers. Based
3 upon this information, Staff and OPC would have seen how Evergy’s surround-sound
4 approach worked to fully engage and educate customers, which the customer research
5 shows was successful. Evergy has submitted examples of these items in our monthly (now
6 quarterly) TOU reports filed in case: EW-2023-0199.

7 **Q: Did Evergy file its implementation plans and give updates for the Commission, Staff,**
8 **OPC, and other interested parties?**

9 A: Yes, Evergy upheld our commitments regarding our TOU implementation plans by
10 submitting them to the Commission, Staff, OPC, and other relevant parties. This
11 transparency was exemplified through multiple presentations, discussions, and follow-up
12 data requests concerning our plans.

13 In addition, Evergy proactively included the details of our proposed
14 implementation timeline within our initial filing in the TOU Workshop case EW-2023-
15 0199 in January 2023. Additionally, we made several filings of our plans, facilitated two
16 stakeholder workshops, conducted three Commission presentations, shared a monthly
17 packet of materials, and diligently responded to numerous requests for information from
18 Staff and OPC. These actions underscore our dedication to ensuring clarity and openness
19 throughout the implementation process.

20 As shared in Case EW-2023-0199:

- 21 ▪ Status Report – 1/17/2023
- 22 ▪ **Stakeholder Workshop 1 – 3/28/2023**
- 23 ▪ Notice of Workshop Presentation – 3/29/2023
- 24 ▪ Reply to Staff Responses and Questions – 4/24/23

- 1 ▪ Response to OPC Questions Regarding the Planning of Time of Use
2 Campaign – 4/26/23
- 3 ▪ Response to Staff’s Concerns, Feedback and Request for Additional
4 Information- 4/26/23
- 5 ▪ **Stakeholder Workshop 2 – 5/23/2023**
- 6 ▪ Notice of Workshop Presentation – 5/25/23
- 7 ▪ Eversource’s Reply to Staff Response to May 23, 2023
- 8 ▪ Presentation and Request for Additional Information – 6/23/23
- 9 ▪ Reply to Staff’s Request of Additional Information – 7/28/2023
- 10 ▪ Eversource Response to Staff’s Request of Additional Information – 8/1/2023
- 11 ▪ **Presentation to the Commission regarding Eversource’s TOU Education**
12 **Plan – 8/10/23**
- 13 ▪ Reply to OPC Comments, and Response to Other Prior Filings – 8/9/2023
- 14 ▪ Notice of Filing Agenda Presentation – 8/11/2023
- 15 • August Monthly TOU Transitioning Reporting – 9/8/2023
- 16 ▪ September Monthly TOU Transition Reporting – 10/10/2023
- 17 ▪ November Monthly TOU Transitional Reporting – 11/9/2023
- 18 ▪ **On-the-record Commission Presentation – 11/28/2023**
- 19 ▪ December Monthly TOU Transitional Reporting – 12/11/2023
- 20 ▪ **Stakeholder Workshop 3 – 12/18/2023**
- 21 ▪ January Monthly TOU Transitional Reporting – 1/10/2024
- 22 ▪ Response to Staff Request for Additional Data – 1/19/2024
- 23 ▪ On-the-record Commission Presentation – 1/22/2024
- 24 ▪ February Monthly TOU Transitional Reporting – 2/9/2023

1 **Q: Did Evergy participate in workshops with the Commission, Staff, OPC and other**
2 **interested parties prior to implementing its TOU rates?**

3 A: As previously mentioned, Evergy conducted three workshops with stakeholders, held on
4 March 28, 2023, May 23, 2023, and December 18, 2023. The workshop objectives and
5 suggested workshop agenda topics were outlined in our Status Report on January 17, 2023.
6 Additionally, the workshop presentations were shared with parties in advance of the
7 meetings. For the first workshop, Evergy proposed in our agenda to share updates on
8 planning activities, discuss best practices learned from other utilities regarding TOU
9 implementations, and solicit ideas from Staff and OPC for the education campaign.
10 Additionally, we suggested holding a second workshop in May to present the fully
11 developed education and outreach plan. This timeline was carefully crafted to ensure that
12 we could incorporate feedback from Staff and OPC before finalizing the outreach plan.

13 Notably, Staff did not express any concerns with this approach, the proposed
14 workshop topics, or the timeline prior to the first workshop, nor did they respond to our
15 Status Report.

16 The January 17, 2023, Status Report (p. 3) stated:

17 7) The Company’s implementation plan for the mandatory TOU and
18 optional rates is focused on customer education and understanding,
19 implementation of digital tools and system enhancements, and
20 development of effective processes that will yield customers’
21 smooth transition to new rates.

22 9) Evergy believes it is important to seek input from Staff (“Staff”)
23 for the Commission and the Office of the Public Counsel (“OPC”)
24 before it develops the details of its marketing and education plan.
25 Evergy is developing a scope of work in a request for proposal
26 (“RFP”) that marketing agencies will respond in the coming months,
27 which will include (but not limited to) development of a marketing
28 campaign, education materials and customer communications.
29 Engaging with Staff and OPC early will be important to ensure that

1 Evergy is thoughtfully incorporating stakeholder feedback as it
2 develops and evaluates responses to the RFP.

3 10) Evergy offers to engage with Staff and OPC in an initial
4 workshop in March 2023 that will include a further update on
5 Evergy's activities that have occurred and planned for the upcoming
6 months related to the implementation; share best practices from
7 other utilities that have implemented (or are preparing) mandatory
8 TOU rates; and solicit ideas from Staff and OPC. At a minimum,
9 **Evergy also offers to engage with Staff and OPC in a second**
10 **workshop in May to share a firmer education and marketing**
11 **plan with milestones, as well as a continued update on activities.**
12 Evergy would be amenable to a further stakeholder workshop(s)
13 and/or Commission presentation prior to October 2023.

14 **Q: Why does Evergy believe the workshops were successful?**

15 A: To prepare for the first workshop, Evergy engaged the Brattle Group to provide insights
16 into best practices from other utility TOU implementations. Their analysis included an
17 examination of the applicability of these practices to Evergy's transition and an assessment
18 of the expected bill impacts to customers due to default TOU rates. We felt these topics
19 were crucial for initiating discussions regarding which tactics Evergy should incorporate
20 into our campaign and identifying customer groups that might require additional support
21 during the transition.

22 Given the absence of supporting testimony or full analysis given the new direction
23 of the Order during the 2022 Evergy Rate Case regarding the customer impacts of default
24 TOU rates with these four rate plans that resulted from the *Amended Report and Order*,
25 understanding the impacts to customers was imperative for our education planning. Prior
26 to this presentation, the true impact to specific customer segments such as space heating
27 customers or vulnerable groups like seniors and low-income customers, with four different
28 options, was not fully known with the four approved TOU rate plans. The data provided
29 by the Brattle Group played a pivotal role in Evergy's comprehension of how the new rates

1 would affect different customer groups and provided stakeholders and the Commission
2 with valuable insights into these impacts. We felt sharing these findings with Staff and
3 OPC was essential for developing the education campaign and collaboratively determining
4 any segments that may require additional or tailored communications.

5 However, Evergy was taken aback by the responses from Staff during the
6 workshop. Staff's conduct created an atmosphere that felt unprofessional, which ultimately
7 resulted in the workshop ending prematurely, hindering important dialogue and discussion.
8 Despite coming to the workshop open to collaboration, Evergy encountered a situation
9 where dialogue was stifled by the situation. Staff gave no indication before the meeting
10 that they did not agree with the agenda for the meeting or offer other agenda items.
11 Following the meeting, other Staff members apologized for the behavior in the workshop.

12 In the second Workshop, Evergy presented the TOU Customer Education Plan to
13 Staff, OPC, a Commissioner, and Commission advisors. By the second Workshop, Evergy
14 had taken Staff and OPC's feedback from the first workshop and from three different data
15 requests/written feedback and was able to incorporate many of those suggestions into our
16 Customer Outreach and Education Plan. Even after both workshops, we continued to make
17 changes based on feedback from stakeholders.

18 **Q: Can you describe some of the suggestions and feedback Evergy included from**
19 **stakeholders?**

20 A: Evergy valued the ongoing discussion with and feedback from both OPC and Staff as we
21 worked to finalize and expand our customer education campaign. We carefully considered
22 the feedback and insights provided during Workshop #1, Workshop #2, and through the
23 extensive conversations and filings in the workshop docket.

1 As a result of this collaborative process, Evergy implemented numerous changes to
2 our approach based on the discussions and feedback received from Staff and OPC. Some
3 of the key areas where adjustments were made include:

4 1. **Campaign Timeline Change:**

5 Taking into account the feedback from Staff and OPC, Evergy moved up
6 the customer education campaign by two months. As a result, the customer
7 education campaign launched in June 2023. We deemed it essential to align
8 the launch of customer communications with the availability of key
9 customer tools like the Rate Comparison Tool, Change My Rate tool, and
10 Rate Education Reports, which weren't available until late June.
11 Additionally, we wanted to ensure our contact center was adequately
12 prepared and staffed to accommodate any increase in customer inquiries,
13 which required time to train and hire. All workstream timelines were
14 changed as a result of the feedback from Staff and OPC.

15 2. **Rate Name Changes:**

16 In response to the feedback from Staff and OPC, Evergy decided to modify
17 the name of the default rate (at that time) from "Seasonal Peak Saver" to
18 "Standard Peak Saver." This change addressed Staff's concerns expressed
19 during the Workshops and aimed to clarify which rate is the new default
20 plan while minimizing the emphasis on seasonal differentials. Although we
21 hold a respectful difference of opinion regarding Staff's assessment that the
22 names were submitted without sufficient time for substantial feedback, we
23 view this example of altering the rate name in response to Staff's input as a

1 genuine commitment to actively engage in the discussion and incorporate
2 their feedback.

3 **3. Updating Overarching Campaign Message and Adding More "Why"**
4 **to TOU Materials:**

5 During the workshops and filings, there was a discussion regarding the
6 inclusion of more prominent messaging around the rationale behind the
7 Commission's order to transition all rate plans to TOU. Specifically,
8 emphasizing the significance of time-based energy usage and the price
9 differentials at different times of the day. In response to this feedback,
10 Evergy adapted the campaign messaging to prioritize the "why" messages
11 earlier in the campaign. While including a detailed explanation in every
12 piece of educational material was not always feasible due to space
13 limitations, we made a concerted effort to incorporate more "why"
14 statements across our materials, starting with Phase 1.

15 The additional educational details within the messaging provided
16 more detailed explanations and context. We incorporated information that
17 highlights how the plans charge higher rates during peak times and lower
18 rates during off-peak periods into our Phase 1 messaging, consistently
19 reinforcing this message throughout the campaign.

20 **4. Prioritizing Education to Impacted Customers:**

21 Evergy's campaign worked to ensure that all customers were aware of the
22 pending change to TOU rates and that they understand that the time of day
23 is associated with the costs of the rate, while also providing additional

1 content and outreach to special customer groups, like those customers
2 impacted by the removal of the space heat discount. As shared in Workshop
3 #2, Evergy provided additional outreach to these special customer groups
4 to help support them as they work to shift their usage.

5 **5. Rate Descriptions:**

6 Evergy's approach, as recommended in Staff's response to Workshop #2,
7 involves pairing rate names with descriptions and illustrations of rate
8 periods wherever possible. This comprehensive information can be found
9 prominently on our website and also included in other educational
10 materials, such as direct mails, the Rate Education Report, educational
11 videos, and emails, whenever space allows.

12 **6. Rate Analysis Tool Description Wording:**

13 During the review of the Rate Analysis Tool, Staff and OPC requested
14 additional language to highlight that not shifting energy usage outside of-
15 peak hours can result in increased costs. Evergy collaborated with our tool
16 vendor to include this language, ensuring that the tool not only emphasize
17 potential cost savings but also addresses the potential cost increase that
18 results when usage is not shifted away from peak hours.

19 **7. Outreach to Food Pantries and Libraries:**

20 Upon request from parties, Evergy expanded its community outreach plan
21 to include food pantries, libraries, and other social service organizations that
22 are connected to the community and can help extend our reach to customers,
23 especially hard-to-reach customers. We provided training and materials

1 related to the TOU transition to these institutions. Moreover, we organized
2 events in collaboration with these groups throughout the summer and fall of
3 2023. OPC acknowledged this effort in their July 14, 2023, Memorandum
4 in Case Number EW-2023-0199 that stated, “The Company has indicated
5 that it expanded its community outreach to include food pantries, libraries,
6 and other social service organizations...”.

7 **8. Videos and YouTube Videos:**

8 While Evergy was planning some videos, Evergy took the feedback
9 provided by OPC in their July 14, 2023, Memorandum and created
10 additional educational videos based off of examples they provided from
11 other utilities. In the end, Evergy created ten videos and have used them on
12 YouTube.

13 **9. Using Visual Representation like Tucson Electric:**

14 Evergy developed an energy graphic very similar to that of Tucson Electric,
15 as specifically requested by OPC in their July 14, 2023, Memorandum to
16 show the relationship of energy and demand and to help customers visually
17 understand the need to move large appliance usage to off-peak times.

18 **Q: Does Evergy believe that its TOU Implementation Plan has been successful?**

19 **A:** Yes, I firmly believe that Evergy's TOU implementation has been successful in both
20 engaging and educating customers, and the customer research and engagement metrics
21 substantiate this assessment.

22 Our third-party customer research has shown that Evergy’s Customer Campaign
23 has been successful in creating awareness among Missouri residential customers. By the

1 end of November, 87% of Missouri residential customers had heard about Evergy’s time-
2 based rates. That is a 93% increase from the baseline measurement in June, truly showing
3 that customers are engaged in the topic. Also, the number of Missouri residential customers
4 who recall Evergy communications about the new time-based rates more than doubled in
5 those few months (increased from 32% to 89%). Customers rated their knowledge just
6 above the mid-point on the 7-point scale. However, when asked what they believe to be
7 true about time-based plans, most correctly identify the key aspects of time-based plans,
8 showing that they are educated on the plans and TOU. Customers became increasingly
9 familiar with the plans throughout the campaign, with 82% being familiar with the plans
10 by the end of the year. Those indicating they know “a lot” or “a good amount”, increased
11 a significant +7 percentage points in Wave 3 of our 3rd party research.

12 Furthermore, our Engagement Data revealed we had seen over 300,000 unique
13 customers visits to our TOU Campaign landing page and over 340,000 unique visits to our
14 Compare My Rate Tool, with approximately 160,000 customers selecting their rate plan
15 before the transition. This data underscores the robust engagement generated by our
16 campaign.

17 Our campaign helped make peak and off-peak household names. Conversations
18 about TOU were happening at supermarkets and churches, between friends and neighbors.
19 Whether a customer liked TOU or not, they were fully engaged in the transition, had an
20 understanding of the key components of TOU, and are more aware of their rate plan and
21 energy usage and costs today than ever before.

1 **II. SPECIFIC RESPONSES TO STAFF WITNESS HUBER AND OPC WITNESS**
2 **KREMER**

3 **Q: In her direct testimony, Ms. Huber agrees that EMW has made substantial efforts to**
4 **make customers aware of the TOU implementation. However, Ms. Huber makes the**
5 **claim that Evergy has not been effective in developing customer education and**
6 **outreach materials. (Huber Direct, pp. 3-4). Do you agree with Staff’s claim?**

7 A: I respectfully disagree with Staff's claim, and the data corroborates this viewpoint. The
8 evidence presented in Staff’s testimony lacks substantiation and fails to reference
9 supporting details from the *Application for Approval and Exhibits* in ET-2024-0061.
10 Contrarily, the *Application* in File No. ET-2024-0061, particularly Exhibit A, illustrates a
11 starkly different narrative. By August 2023, merely a few months into the 18-month
12 campaign, 76 percent of customers were already aware of the transition to TOU rates, with
13 the number of customers recalling Evergy’s communications about TOU rates more than
14 doubling since June’s baseline. These metrics unequivocally demonstrate successful
15 customer engagement. It's crucial to note that the data in Exhibit A was gathered two full
16 months before the transition to TOU rates commenced and before Phase 2 of the Customer
17 Campaign had been fully rolled out. Research results for September, October, November,
18 and December of 2023 all showed large increases in awareness, recall, and TOU
19 educational understanding.

20 Moreover, Evergy's filing of the *Application for Approval of Tariff Revisions* in
21 case ET-2024-0061 occurred subsequent to the Commission Agenda Meeting on
22 September 30, 2023. During this meeting, Commissioners suggested Evergy make a
23 revised tariff filing. In response to this suggestion, Evergy promptly filed the *Application*
24 days later based on the Commission's Agenda meeting discussion. Therefore, the timing of

1 Evergy's filing aligns with the Commission's guidance and underscores our commitment
2 to cooperation and responsiveness.

3 **Q: On page 4 of Ms. Huber's direct testimony, she testifies that Staff does not believe**
4 **that customers have a good understanding of the TOU rate options partially because**
5 **of the tactics used during the beginning phases of the campaign. Do you agree with**
6 **her testimony on that point?**

7 A: The evidence indicates that Evergy's customers have a very good understanding of the
8 TOU rate options, why Evergy has TOU rates, and how to be successful on their rate, and
9 this knowledge and understanding continues to increase as Evergy moves through all five
10 phases of our outreach campaign. Evergy's TOU education campaign was designed using
11 the Awareness, Interest, Desire, and Action (AIDA) model and principals, or "Marketing
12 Funnel" approach, which has been shown to be effective for decades in working to engage
13 customers and move them from awareness to deeper understanding or action. Each part of
14 the AIDA model uses distinct tactics and messaging to move a customer from first learning
15 about something to becoming fully aware and having understanding. This approach allows
16 customers to build upon their knowledge and understanding over time, also known as the
17 educational theory of Constructivism, which has been a proven and successful approach
18 most often used in education and marketing.

19 Evergy's "beginning phases" tactics, as Ms. Huber described them, were
20 purposefully designed to lay a foundation on the TOU topic that would then allow
21 customers to build their knowledge as they moved through the other phases of the
22 campaign. Our Phase 1 approach, or the Awareness phase, was built using the type of
23 tactics and messaging recommended by the AIDA model, which include high-level

1 messaging and mass awareness tactics. This approach allowed Evergy to gain customer
2 mindshare and set a baseline awareness regarding the change to TOU rates. During phases
3 2-5 of our TOU campaign, Evergy used more detailed messaging and 1-to-1 marketing
4 tactics to build upon the awareness gained in Phase 1, to help customers have a deeper
5 understanding of TOU rate options, why Evergy is moving to TOU rates and finally, how
6 they could be successful on their rate plan.

7 Ms. Huber appears to use a much more limited review, only referencing phase 1 of
8 the full 5-phase campaign and ignores a proven approach to building customers awareness,
9 understanding and action. Ms. Huber's approach is like testing a student's full knowledge
10 on a topic after the first lesson rather than waiting until the teacher has taught the full unit.

11 **Q: Ms. Kremer suggests that while customers may have high awareness of TOU rates,**
12 **they are not educated on the topic. Do you believe that to be true?**

13 A: No. First, since Ms. Kremer references' OPC's July 14 Memorandum regarding the use of
14 awareness tracking and measurement rather than educational measurement, I would like to
15 remind Ms. Kremer of Evergy's reply to OPC's Memorandum where we stated:

16 Evergy acknowledges that metrics such as click-through rate and
17 page views provide valuable insights, but also recognizes that they
18 only offer a partial view of the overall measurement picture. To gain
19 a more comprehensive understanding, Evergy has implemented a
20 multi-faceted approach involving various measurement methods:

- 21 ■ Individual Tactic Measurement: This involves tracking and
22 analyzing the performance of each specific tactic used in the
23 strategy.
- 24 ■ Internal Monthly Survey: Evergy conducts monthly surveys
25 of customers to understand how customers are responding to
26 the campaign and their understanding of the pending
27 changes.

- 1 ▪ A 3rd Party Survey: Using a third-party survey to capture
2 feedback and insights at three points in the transition
3 process; before, during and after the campaign.

- 4 ▪ Monitoring Rate Comparison Tool Usage: Evergy actively
5 observes how many customers are using Rate Comparison
6 Tools, enabling us to assess customer engagement and
7 interest.

- 8 ▪ Pre-selection into a Rate: By monitoring how many
9 customers are opting into a TOU rate before the mandatory
10 change, we can gain insight into the effectiveness of the
11 campaign and what motivates customers to take action rather
12 than defaulting into the new rate.

13 By combining these diverse measurement methods, Evergy aims to
14 develop a comprehensive understanding of tactic effectiveness,
15 customers' comprehension of TOU rates, and the number of
16 customers taking direct action and converting to the desired
17 outcome.

18 Ms. Kremer's claim that Evergy only focused on awareness measurements, is not only
19 untrue but fails to account for the multiple measurement dashboards provided to OPC
20 monthly in case EW-2023-0199 where we clearly show that we are tracking awareness and
21 customer understanding, along with individual channel performance and customer actions.
22 Ms. Kremer did not cite any of these dashboards when expressing concern about our
23 campaign measurement approach in her testimony and continued to refer to one
24 presentation in August, which would not have taken into account the results of Phase 2-5
25 of our campaign or our full measurement approach.

26 To correct the record, in addition to high awareness, when asked in research if
27 customers know the main features of TOU rates, such as they will pay more for electricity
28 during peak hours and less during off-peak hours, more than 60 percent customers were
29 able to correctly understand TOU rate features by Phase 3. In fact, more than 40 percent of
30 surveyed customers expressed satisfaction with their level of knowledge on TOU rates and

1 indicated they need no further information on the topic. In addition, when asked what they
2 believe to be true about time-based plans, most correctly identify the key aspects of time-
3 based plans, showing that they are educated on the plans and TOU. Customers became
4 increasingly familiar with the plans throughout the campaign, with 82% being familiar with
5 the plans by the end 2023. Those indicating they know “a lot” or “a good amount”,
6 increased a significant +7 percentage points in Wave 3 of our 3rd party research.

7 Furthermore, our Engagement Data on educational tactics reveals over 300,000
8 sessions to our TOU Campaign landing page and over 340,000 unique visits to our
9 Compare My Rate Tool, with approximately 160,000 customers selecting their rate plan
10 before the transition. This data underscores the robust engagement generated by our
11 campaign.

12 Evergy uses a mix of measurements to understand customer engagement,
13 awareness, advertising performance and TOU understanding and education. All of these
14 measurements show a major increase from the baseline and continued to increase
15 throughout the multiple phases of the campaign. Ms. Kremer continues to be selective in
16 her review of Evergy’s campaign and has ignored the number of responses and filings
17 Evergy has made regarding the campaign, measurement and approach.

18 **Q: Do you have other comments about allegations from the Staff and OPC that Evergy**
19 **focused too much on peak pricing and provided misinformation?**

20 A: I believe Ms. Huber’s testimony is confusing and I disagree with her findings. She makes
21 the claim that Evergy focused on the peak pricing aspects of the TOU plan and failed to
22 **adequately** educate its customers as to the overall bill impacts of the time-based rate plans.
23 While Ms. Huber’s opinion may be that the campaign was inadequate, her testimony admits

1 that Evergy conducted a campaign to engage and educate customers. In fact, she states that
2 “Staff believes EMW has made substantial efforts to make customers aware of the TOU
3 implementation . . . “, (Huber Direct, p. 3, ln. 23-24) However, she quarrels with Evergy’s
4 “tactics.” As I discuss herein, those efforts were effective in educating customers about the
5 TOU rates and their likely impact upon the customers’ bills.

6 Secondly, Ms. Huber’s testimony that Evergy focused on peak pricing in a manner
7 that was confusing rather than focusing on bill impacts (Huber Direct, p. 4) is concerning.
8 I firmly believe that the more than 130,000 customers who pre-selected a rate are better off
9 being informed about their rate options and being empowered to choose the plan that best
10 suits their family's needs. The 90 percent of customers who were aware of the switch to
11 time-based rates are also better off for understanding that their electricity is more expensive
12 during certain periods. To suggest that customers would be better off not knowing about
13 the opportunity to access less expensive energy during off-peak times and weekends, and
14 to have more control over their energy, is insulting to Evergy customers. To say Evergy’s
15 information was incorrect or confusing is untrue, and Ms. Huber gives no evidence to back
16 up her claim, only her opinion. Evergy customers are more aware of how peak usage affects
17 their energy bill and the power grid more than ever before and that is something we all
18 should be proud of.

19 The Commission's *Amended Report and Order* for default TOU rates for Evergy
20 customers underscores the importance of encouraging energy usage during off-peak hours
21 to optimize the efficiency of the electrical grid and reduce overall costs. By providing
22 educational materials that emphasize the benefits of shifting energy usage to off-peak
23 times, Evergy aimed to empower customers to make informed decisions that can lead to

1 cost savings and contribute to a more sustainable energy future. In essence, the provision
2 of educational materials promoting off-peak energy usage aligns with the overarching
3 objectives of the Commission's Order and underscores Evergy's commitment to educating
4 and empowering its customers.

5 Ms. Kremer tries to make similar points as Ms. Huber, but she similarly provides
6 no substantiation to bolster her position.

7 **Q: In her direct testimony, Ms. Huber argues that it was “fear-based” messaging to**
8 **inform customers that they could save money on their bills by setting their**
9 **thermostats to avoid cooling during the summer peak hours of 4-8 pm. Do you believe**
10 **this message was “fear-based” as alleged by Staff?**

11 **A:** No, and I think it is very important to point out that Evergy has never encouraged or
12 recommended that customers take excessive action to change their usage behavior and have
13 repeatedly messaged that customers only need to shift usage of a few large appliances. We
14 often provided multiple of tips and options for customers to choose from, noting that
15 customers only need to do some of the tips.

16 Here are a few examples of the messages used in our TOU Campaign
17 communications:

18 This plan is very similar to your current rate, but you can save
19 money by shifting **some** energy usage to overnight times. **You don't**
20 **need to avoid using energy altogether during peak** hours but try
21 to shift when you use large appliances to off-peak hours when the
22 cost of energy is lower.

23 Shifting the use of your large appliances to off-peak hours will make
24 a more significant difference on your bill. Smaller items like cell-
25 phone chargers, the vacuum cleaner, laptops and lamps don't draw
26 enough energy to make a huge difference, so it's up to you whether
27 to avoid peak hours with those types of items.

1 In addition, it is actually Staff who has recommended that some customers take
2 “...more aggressive energy management practices to achieve a favorable bill outcome”
3 which was used on the MPSC’s website and developed as a TOU FAQ document by Staff,
4 as shared in case EW-2023-0199. I can’t think of a more “fear-based” language then to tell a
5 customer to take “aggressive” action, as Staff has done.

6 Evergy has provided practical, simple steps customers can take to optimize their
7 energy usage. This balanced approach ensures that customers are empowered to make
8 decisions that align with their individual needs and circumstances.

9 **Q: The Staff and OPC witnesses criticize the Company’s use of phrases like**
10 **“mandatory,” and “mandate” in your communications with the public which Ms.**
11 **Kremer says, “invoked a sense of ‘dread.’” Do you have any comments?**

12 **A:** Yes, thank you for the opportunity to touch on this subject in more detail, as I’ve truly been
13 surprised at the questioning of the use of the word mandatory from Staff, OPC and others.
14 Moving to default TOU rates has been referred to by Staff, OPC and the Commission since
15 we started debating this issue during the 2022 Evergy Missouri rate case, and likely even
16 before that, and Ms. Huber’s claims that Evergy’s education material was alarmist due to
17 the use of the phrase “mandatory” in some limited communications items is not backed up
18 by any evidence or facts.

19 In the *List of Issues, Order of Witnesses, Order of Cross-Examination and Order*
20 *of Opening Statements* submitted by Staff in Case ER-2022-0130, Staff and all parties
21 called this issue “Should the Staff’s proposed Time of Use rate schedules be implemented
22 on a mandatory basis?” (Item XVIII. Rate Design/Class Cost of Service, Issue G).

1 Furthermore, when discussing the issues during their November 8, 2022, agenda
2 meeting, the Commission also referred to this Order as “mandatory TOU rates”, including
3 during these discussions:

4 Chairman Silvey: “...first I want to look at G and F. Should the
5 Staff’s proposed rate schedules be implemented on a mandatory
6 basis...”

7 Commissioner Rupp: “I’ve been a fan of mandatory time of use
8 rollout for years.” “...and do making it mandatory with the six
9 months...” “...just going to the opt out with mandatory side is what
10 incentivizing the behavior...”

11 Commissioner Holsman: “I’m not opposed to mandating when
12 mandating is the option that is necessary...” “So I would be more
13 inclined to support the company continuing to do a non-mandated
14 but aggressive timeline...” “....for those reasons, I’m not opposed
15 to mandating....”

16 Staff also used the phrase in their own FAQ document used on the Commission
17 website and filed in case EW-2023-0199 to help customers with questions about the change
18 to TOU rates. Staff’s document states: “Some have time-based rate plans as options, some
19 as mandatory plans, and some use a time-based demand charge to set customer monthly
20 bills.” Staff used the word “mandatory” in the same way Evergy used “mandatory,” to help
21 distinguish between optional TOU rates and ones that are not optional.

22 The Office of Public Counsel also uses mandatory TOU rates when referring to
23 Evergy’s new rate order in their “Motion to Suspend Hearing” filing in Case No. ET-2024-
24 0061 when they say: “Evergy’s belated request to change the tariff sheets to implement its
25 TOU rates, which was made a mere twenty-three days before the TOU rates are to be
26 implemented and eight months after the Commission issued its Amended Report and Order
27 **ordering the use of mandatory TOU rates**, should not constitute a reason to infringe
28 upon parties’ due process rights.” And also, when they say “Finally, as the Commission is

1 well aware, the Company continues to reject mandatory TOU rates despite having the
2 technology in place for more than eight years now.” (Surrebuttal Testimony of Geoff
3 Marke, page 31, line 25 in ER-2022-0130)

4 As you can see, this issue had been referred to as Mandatory TOU rates by all
5 parties for a number of years but is only recently being challenged when Evergy used the
6 term as coming off as “alarmist” or “fear-based.”

7 I don’t believe the Commission, Staff or OPC were being “alarmist” in their use
8 of the word to reference this change, and neither was Evergy. Also, Staff suggests that
9 Evergy was not clear in our messaging, and I can’t think of anything that was more clear
10 and helpful in letting customers know that an important change was coming, and they
11 needed to pay attention, in contrast to optional TOU rate plans they had heard about for
12 several years. There certainly was no messaging intended for consumers to “dread” the
13 coming changes in their electric rates.

14 **Q: On pages 4-5 of her direct testimony, Ms. Huber testifies that EMW did not focus on**
15 **educating customers as a part of its strategy. Do you agree with this characterization?**

16 **A:** Absolutely not. As I mentioned earlier, Evergy implemented a comprehensive 5-phase
17 education campaign using the trusted AIDA model. Ms. Huber’s analysis only considers
18 one phase of this multiphase campaign. I believe our customers are now more aware of
19 their rates, better understand how TOU rates work and recognize the savings opportunities
20 if they decide to shift usage to off-peak times. Awareness and understanding will continue
21 to grow as customers spend more time on TOU rates and receive ongoing support and
22 coaching from Evergy. Our campaign is grounded in proven educational models that build

1 customer knowledge and understanding over time, providing them with the tools to
2 comprehend their usage and options, and supporting their continued growth in knowledge.

3 In addition, Evergy accelerated the education timeline, which was one of many
4 suggestions that Evergy agreed to from Staff and OPC. Evergy moved up our proposed
5 timeline by about two months, starting the campaign in June 2023, which was about five
6 months before the transition started and seven months before the date to have all customers
7 moved to TOU. This timeline acceleration gave an additional two months of education with
8 additional communication and educational materials. As noted, Evergy did not feel starting
9 the campaign any earlier was possible or best for the customer due to multiple reasons,
10 including:

- 11 1. Commission Order requiring time for workshops and collaboration with
12 Staff and OPC
- 13 2. Technical enhancement needs for the new rates in the Rate Comparison
14 Tool and availability of the tool to customers
- 15 3. Time to update the Change My Rate tool to allow online rate changes
- 16 4. Vendor time to model new rates for shadow billing/Rate Education Reports
- 17 5. Ability to conduct research and develop the customer campaign, including
18 strategy, messaging and creative
- 19 6. Time to research and develop program names
- 20 7. Time to hire and train additional Customer Service Representatives
- 21 8. Ability to implement billing and system changes needed for default TOU

22 We felt strongly that having the tools in place was paramount before starting any
23 customer communication and we believed the Commission supported that direction as they
24 indicated during their November 9th, 2022, Agenda Meeting Discussion:

25 “Education is one thing but having the tools necessary in the form
26 of software application on your phone. Being able to empower the
27 ratepayer to track and monitor and control their own usage...” “As

1 we go forward here, not just from an education standpoint of
2 informing people but really providing them the tools necessary to be
3 successful with the program, I would strongly encourage” –
4 Commissioner Holsman, November 9th, 2022, Agenda Meeting
5 Discussion.

6 “...I absolutely agree with that. And I will say to the Company’s
7 credit, they started to move to this technology years ago and on their
8 customer outreach they do a great job offering different avenues and
9 windows into their company and their customer experience. Chair
10 Silvey, November 9th, 2022, Agenda Meeting Discussion.
11 Commissioner Holsman, I agree 100%. I know the company based
12 on the different things they have shown us has been investigating all
13 the different technologies and things from the app from shadow bill
14 they have been studying this and looking at what others have been
15 doing around the country. I am excited to see how robust and
16 innovative they can be.” – Commissioner Rupp, November 9th,
17 2022, Agenda Meeting Discussion

18 “I don’t want the program to fail on the ratepayer side when the tools
19 exist to help them be successful.” – Commissioner Holsman,
20 November 9th, 2022, Agenda Meeting Discussion

21 Staff's insinuation that implementing default TOU rates and introducing multiple
22 new rate options can be easily accomplished overlooks the significant complexities
23 involved in such a process. Evergy emphasizes that implementing the Commission's Order
24 required extensive planning and coordination. One critical aspect to making this change
25 was to synchronize the Customer Education Campaign with other customer tools and
26 billing systems. This strategic alignment ensured that customers had access to essential
27 resources such as the Rate Comparison Tool, online rate change options, and
28 knowledgeable Customer Service Representatives. By timing the education campaign with
29 these crucial components, Evergy aimed to enhance the overall customer experience and
30 facilitate informed decision-making regarding rate options.

1 **Q: On page 10 of her direct testimony, Ms. Huber also testified that Evergy’s use of the**
2 **message “Missouri” is moving to time-based rates instead of “Evergy Missouri”**
3 **misled customers. Do you agree?**

4 A: Once again, Ms. Huber fails to provide evidence to support her claim. Evergy operates
5 within a media market that includes Kansas and serves customers on both sides of the state
6 line. To minimize customer confusion, it was crucial to clearly communicate which
7 customers were transitioning to TOU rates. Every piece of advertising prominently
8 featured Evergy’s logo, making it evident that the message was from Evergy. Ms. Huber’s
9 testimony overlooks the comprehensive creative and messaging strategy employed in the
10 advertising campaign.

11 **Q: On page 15 of her direct testimony, OPC witness Kremer recommends that the**
12 **Commission disallow 50% of the TOU education costs from rates. Is this**
13 **recommendation reasonable?**

14 A: No. As authorized by the Commission’s Report & Order in File No. ER-2022-0130, the
15 Company deferred the education and other costs associated with the implementation of the
16 Commission’s Order on TOU rates in its last general rate case. The Company has diligently
17 pursued its obligation to engage and educate its customers regarding the TOU rates. As
18 discussed in the rebuttal testimony of Evergy witness Charles Caisley, it would be an abuse
19 of discretion for the Commission to now arbitrarily disallow half of those costs after the
20 Company has prudently expended the funds to implement the Commission’s Order.

1 **III. RESPONSE TO OPC WITNESS GEOFF MARKE**

2 **Q: On page 21 of the direct testimony of OPC witness Geoff Marke, he recommends that**
3 **the Commission order the Company to explain to the public through Public Service**
4 **Announcements the four following items: (1) Exactly why time-of-use (“TOU”) rates**
5 **are being offered and encouraged; (2) That the TOU option allows for choice; (3)**
6 **That customers should save money in the short (monthly bill savings) and long**
7 **(deferred capital investments) term if they adjust their behavior; and (4) That savings**
8 **do not require excessive actions on the customers part. Does Evergy have concerns**
9 **about this recommendation?**

10 **A:** I disagree with his suggestion of another large TOU campaign. I feel strongly that Evergy’s
11 TOU campaign now in its final stage, effectively communicated the tenets of TOU rate
12 plans and its benefits to our customers, and the launch of a new campaign at this point
13 would have a negative impact on customer satisfaction and work against the goal of Dr.
14 Marke’s suggestion. It is important to point out that Dr. Marke’s recommendations are
15 based on his self-described “cursory review” of Evergy’s past campaign (Marke, P. 15,
16 Line 7), feedback from a “minority of customers” (Marke, P. 15, Line 8), and his
17 “assumption” (Marke, P. 16, Line 2). Merriam-Webster defines cursory as “lacking in
18 depth or solidity,” which seems appropriate given that Dr. Marke’s testimony lacks
19 substantial supporting evidence or facts to back up his assertions. Considering the cost
20 impacts and potential customer confusion of Dr. Marke’s recommendation, I hope the
21 Commission reviews it with great caution, as the actual research-based findings suggest a
22 different result from Evergy’s current TOU campaign.

1 Rather than taking a cursory approach and conducting another costly campaign, I
2 believe the evidence shows that the current TOU campaign is working. Evergy customers
3 are aware of the TOU rates, increasingly understand how TOU rates work, and recognize
4 how TOU benefits Evergy, customers and the community.

5 While we don't believe another campaign reiterating the information we've already
6 provided is not currently needed, we do plan to continue to provide support messaging
7 through TOU savings and behavior tips, seasonal rate transition messaging. This will
8 include information about why we offer TOU rates and allow opportunities to select that
9 best plan for their family/household.

10 This approach moving forward aligns with our current 5-phase, 18-month
11 campaign which is currently in its final phase.

12 **Q: Is there any research that suggests that customers are aware of “why” Evergy**
13 **transition to TOU rates and how the rates work?**

14 **A:** Yes, both Evergy's internal customer research and third-party customer research
15 demonstrate the success of Evergy's TOU campaign in multiple areas, including
16 understanding the reasons behind offering TOU rates, increasing awareness that Evergy
17 offers rate choice and multiple TOU plans, and helping customers manage their usage
18 under these rates.

19 The research shows that more than 50 percent of surveyed customers correctly
20 identified the primary reason for TOU rates, understanding that TOU aims to help reduce
21 the load on the energy grid during peak times. When asked about the main features of TOU
22 rates, such as higher costs during peak hours and lower costs during off-peak hours, more
23 than 60 percent of customers demonstrated a clear understanding. More than 40 percent of

1 surveyed customers expressed satisfaction with their knowledge of TOU rates and felt no
2 need for additional information.

3 Our internal research, supplemented by studies conducted by TrueNorth, further
4 highlights the widespread awareness and understanding of the TOU transition among
5 customers. More than 90 percent of customers surveyed by Evergy were aware of the
6 transition to TOU rates, and over 70 percent recalled seeing communications from Evergy
7 on the topic. Additionally, more than 30 percent of customers proactively selected their
8 rate plan before the transition, and close to 350,000 customers utilized the TOU Rate
9 Comparison Tool. These numbers clearly show customer engagement and education,
10 resulting in the desired action and surpassing our campaign goals for awareness of the TOU
11 transition.

12 Dr. Marke's assertion that "Customers were never told why these plans were being
13 offered to begin with" (Marke, P. 17, Line 22) is not only untrue but also ignores the
14 numerous campaign examples shared with OPC in Case EW-2023-0199.

15 **Q: Dr. Marke's testimony suggested that Evergy's current campaign messaging has only**
16 **focused on "what plan works best for a specific customer" and is recommending new**
17 **messaging for his proposed new campaign, how do you respond to his accusation and**
18 **recommendations?**

19 **A:** Again, Dr. Marke is incorrect in his assumption that "*To date, the focus on TOU education*
20 *has been on what plan works best for a specific customer*" (Marke, P. 17, Line 21). Both
21 the customer communication examples provided to OPC in Case EW-2023-0199 and the
22 customer research prove otherwise. Evergy developed a comprehensive five-phase
23 campaign with unique messaging in each phase, designed to move customers from

1 awareness and education to action, and then to transition and support, as described in my
2 testimony earlier. See Schedule KRM-2 for our phased messaging approach.

3 In Evergy's five-phased TOU campaign, we utilized the same or very similar
4 messaging that Dr. Marke recommended across multiple outreach tactics. I have listed a
5 few examples, using Dr. Marke's suggestions as categories, which demonstrate that
6 Evergy's TOU campaign was **not solely focused** on helping customers choose a plan but
7 also on ensuring they understood the broader context and benefits of TOU rates, and
8 providing ongoing support to maximize their benefits. This multi-faceted approach aimed
9 to empower customers with knowledge and tools to manage their energy consumption
10 efficiently, ultimately contributing to the success of the TOU transition.

11 **Marke Messaging Suggestion 1:** *Exactly why time-of-use (TOU) rate are being offered*
12 *and encouraged.*

13 **Evergy's campaign messaging examples:**

14 **Why is Missouri changing? (Website)**

15 Timing plays a crucial role in energy, especially when it comes to cost. As energy
16 demand rises, the cost of generating electricity also increases. This usually happens
17 during peak hours of 4-8 pm. During off-peak times (usually in the early morning
18 and overnight) energy demand goes down, which means lower energy costs.

19 At the same time, reducing energy usage during high-demand times (like hot
20 summer weekdays) also helps lower the strain on the energy grid.

21 Together, we can embrace the change in Missouri to time-based rate plans and
22 unlock the potential for savings while making a positive impact on our environment
23 and energy grid.

24 **Why is Missouri changing to time-based rates? (Newspaper Ads)**

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

1 **Why is Missouri changing to time-based rates?** (Bill Insert)
2 Timing is everything when it comes to energy costs. By switching to time-
3 based rates, Missouri is working to match the cost you pay with the actual
4 costs to produce energy. With time-based rate plans, you'll pay less for
5 energy during off-peak times, when demand for energy is lower, and more
6 for energy used during peak hours of 4-8pm.

7 **Why is Missouri moving to time-based plans?** (Letter)

8 Supply and demand play an important part in the overall cost to produce
9 energy. When there is a high demand for energy during the peak hours,
10 producing energy becomes more expensive. On the other hand, when
11 energy demand is lower, the cost to produce energy goes down. With the
12 new time-based rate plans, you'll pay less for energy during the off-peak
13 times, which are most of the time, and more during the few peak hours.

14 **Market Messaging Suggestion 2:** That the TOU options allow for choice.

15 **Evergy campaign messaging examples:**

16 "Missouri customers will have a choice of four new rate plan options."
17 (Newspaper ads, brochures)

18 "It's time to choose your new time-based rate plan." "...so Evergy has
19 introduced four new rate plan options to fit your household needs." "Choose
20 your new plan now!" (Bill insert)

21 "Choose your new plan by October" "It's time to choose your new time-
22 based rate plan." "To help you choose the best plan for your household..."
23 (Postcard)

24 In addition, Evergy's customer survey research conducted in November 2023
25 showed that over 95 percent of customers felt that Evergy's current TOU rate plans allowed
26 for customer choice. This represented a 50 percent increase from the baseline measurement
27 taken in June 2023 (EW-2023-0199, TOU Commission Report, Feb. 2024, slide 129).
28 These results speak for themselves, demonstrating that Evergy's campaign effectively
29 communicated that TOU options provide customer choice, and customers understood and
30 believed this message. This significant increase in customer perception underscores the
31 success of Evergy's 5-phase campaign in educating customers not only about the benefits

1 and flexibility of TOU rate plans, but also the addition of rate choice and options. It also
2 highlights the importance of a well-structured, multi-phased approach to customer
3 engagement and education, ensuring that customers are not only aware of their options but
4 also feel empowered to make choices that best suit their needs.

5 **Marke Messaging Suggestion 3:** *That customers should save money in the short and long*
6 *term if they adjust their behavior.*

7 **Energy campaign messaging examples:**

8 “During off peak times, the demand for energy decreases, resulting in lower energy
9 costs. By shifting your large-appliance use – like running the dishwasher and doing
10 laundry – to off-peak times, you’ll potentially save both energy and money on these
11 new plans. With time-based rates, you’ll pay less for energy most of the time.
12 **According to our analysis, time-based rate plans may result in small annual**
13 **savings for most customers, depending on the season and household.”**
14 (Customer Email)

15 “With this change to time-based rates, it will be important to monitor not only how
16 much energy you use but also when you use it, to save on your monthly bill”
17 (Customer Letter)

18 **Marke Messaging Suggestion 4:** *That savings do not require excessive actions on the*
19 *customer part.*

20 **Energy campaign messaging examples:**

21 **How to save on time-based plans.** (Customer letter, Bill Insert)

22 You don’t need to avoid using energy altogether during peak hours but try to shift
23 when you use large appliances to off-peak hours when the cost of energy is lower.”

24 **How to save on the Peak Reward Saver plan.** (Customer letter)
25 This plan is very similar to your current rate, but you can save money by shifting
26 some energy usage to overnight times. You don’t need to avoid using energy
27 altogether during peak hours but try to shift when you use large appliances to off-
28 peak hours when the costs of energy is lower.

29 **How to save on this plan** (Customer Email)

30 Shifting the use of your large appliances to off-peak hours will make a more
31 significant different on your bill. Smaller items like cell-phone chargers, the

1 vacuum cleaner, laptops and lamps don't draw enough energy to make a huge
2 difference, so it's up to you whether to avoid peak hours with those types of items.

3 The data and examples clearly show that Evergy's efforts in messaging and communication
4 have positively impacted customer awareness and understanding, contradicting Dr.
5 Marke's assumption that the campaign was solely focused on rate plan selection without
6 adequately addressing the broader benefits and reasons for TOU rates.

7 **Q: In his testimony, Dr. Marke suggested that the current campaign was problematic**
8 **because there was a failure to promote TOU rates that result in meaningful savings**
9 **to customers, which would now result in more resources and messaging being**
10 **necessary, do you agree with his findings?**

11 **A:** No. Again, Dr. Marke provides no evidence to support his comments in this area, nor does
12 he offer any factual basis to back up his claims that Evergy has failed to conduct a campaign
13 that will result in meaningful savings. To understand customer savings, a peak analysis will
14 need to be conducted using a full year of customer TOU data. It is too early to assume that
15 customers have not made meaningful behavior changes. Dr. Marke is making premature
16 statements without merit or fact, creating a false narrative about Evergy's current campaign
17 that is unhelpful to our collaboration and the goal of making meaningful, fact-based
18 decisions to benefit customers now and in the future.

19 In addition, OPC continues to provide contradictory remarks regarding the
20 appropriate messaging for customers. On one hand, Dr. Marke suggests that Evergy focus
21 more on the "why" (Marke, P. 16, Line 12, and P. 17, Line 10) and then also suggests we
22 emphasizes that "*savings do not require excessive action on the part of the customers*"
23 (Marke, Page 17, Line 16).

1 On the other hand, OPC has consistently asked for more emphasis on behavior
2 change communication, as they shared in both the November 2023 and April 2024 TOU
3 On-The-Record Commission presentations:

4 “...I want to remind people that the true benefit of time of use rates
5 is the capacity to mitigate peak load by changing how customers
6 consume electricity.” “...**I hope we have more and more**
7 **emphasis placed on convincing people to change their**
8 **consuming habits...**” – John Clizer, April 2, 2024, Evergy’s TOU
9 On-The-Record Presentation. (emphasis added)

10 “...the purest and best use of time of use rates is hopefully to
11 eventually reduce peak energy usage and by extension reduce
12 energy costs...which should in turn lower customer bills.” – John
13 Clizer, November 28, 2023, Evergy’s TOU On-The-Record
14 Presentation.

15 This input directly contradicts Dr. Marke's claim that Evergy's messaging should
16 downplay the importance of behavior changes, but then also contradicts his claim that
17 customers did not get messaging to make meaningful usage changes. Further, I think it is
18 very important to point out that Evergy has never encouraged or recommended that
19 customers take “excessive action” to change their usage behavior and have repeatedly
20 messaged that customers only need to shift usage of a few large appliances. Here are a few
21 examples of the messages used in our TOU Campaign communications:

22 “This plan is very similar to your current rate, but you can save
23 money by shifting **some** energy usage to overnight times. **You don’t**
24 **need to avoid using energy altogether during peak** hours but try
25 to shift when you use large appliances to off-peak hours when the
26 cost of energy is lower.”

27 “Shifting the use of your large appliances to off-peak hours will
28 make a more significant difference on your bill. Smaller items like
29 cell-phone chargers, the vacuum cleaner, laptops and lamps don’t
30 draw enough energy to make a huge difference, so it’s up to you
31 whether to avoid peak hours with those types of items.”

1 Evergy has provided comprehensive information about both the reasons behind
2 TOU rates and the practical, simple steps customers can take to optimize their energy
3 usage. This balanced approach ensures that customers are empowered to make decisions
4 that align with their individual needs and circumstances. We have research-backed
5 evidence supporting that the campaign has been effective in educating customers about the
6 reasons why we are moving to TOU rates and the benefits to customers and the energy
7 grid.

8 **Q: Dr. Marke also mentioned a meeting on June 5th, 2024, with the Missouri Energy**
9 **Efficiency Advisory Collaboration (“MEEAC”) as an anecdotal example to support**
10 **his recommendation. Do you have any response to his recollection of that meeting?**

11 A: Yes, thank you. Since the MEEAC meeting on June 5th, 2024, was the only example Dr.
12 Marke provided to support his recommendation, I think it is important to correct the record
13 regarding that meeting’s topic, attendance, and discussion as described in his testimony.

14 First, Dr. Marke stated that the presenter “*provided recommended messaging*
15 *approaches to marginalized communities around Evergy’s pricing options*” (Marke, P. 16,
16 Line 6). In reality, the topic of the presentation, as described by the presenter Amanda
17 Wilson, was “*outreach strategies for informing diverse customers regarding rate changes*
18 *or really any (program)*” (A. Wilson, June 5th, 2024, MEEAC Zoom meeting recording).
19 The presentation was not specifically focused on Evergy, as suggested by Dr. Marke, but
20 was intended for any utility or program implementor in attendance. In fact, after her
21 presentation, Ms. Wilson asked Evergy representatives if there were any additional
22 findings based on our experience that we would recommend sharing with the group.

1 Ms. Wilson’s presentation provided seven recommendations for working with
2 diverse customers when implementing TOU rates or other programs. Although this
3 presentation was given in June 2024, a full year after Evergy had started our TOU
4 campaign, it was unsurprising to me that many, if not all, of the recommendations given
5 by Ms. Wilson were already implemented within Evergy’s current TOU campaign.

6 Here are the seven recommendations provided by the presenter and examples of
7 how Evergy has addressed these within our TOU campaign:

8 **Recommendation 1: “Language Accessibility”**

9 **Evergy’s TOU Campaign Example:**

- 10 ▪ Evergy’s campaign included multiple touchpoints, communication tactics
11 and channels, and bilingual messaging in both English and Spanish,
12 including videos and handouts. Evergy also ensured representation at events
13 with predominantly Spanish-speaking audiences by deploying Spanish-
14 speaking employees and actively engaging with Spanish-speaking
15 communities

16 **Recommendation 2: “Segment your Time of Use communications”**

17 **Evergy’s TOU Campaign Example:**

- 18 ▪ **Segmentation:** Evergy developed a campaign that would reach all Evergy
19 customers while also prioritizing engagement efforts for special customer
20 groups including seniors, income-eligible customers, households relying on
21 electric heating, and those less digitally inclined. We developed new and
22 additional outreach items especially geared towards these audience. We

1 tracked the pre-enrollment of these customers to see if new or additional
2 materials would need to be created.

- 3 • **Mix Use of Tactics:** Evergy used a mix of education tactics including
4 mailers, email, newspaper advertising, radio ads, in person events, partners
5 and more to help reach a diverse group of customers.
- 6 • **Contact Center:** While all Evergy Customer Service Representatives
7 (CSRs) were trained to address TOU questions, a dedicated TOU phone
8 number and team of CSRs specially trained in TOU inquiries were
9 established, providing direct access to in-depth assistance for customers
10 who may not be digital.

11 Comment from MEEAC presenter: *“I know Evergy has done that” – (A. Wilson, June 5th,*
12 *2024, MEEAC Zoom meeting recording)*

13 **Recommendation 3:** “Meet people where they are and train others as navigators”

14 **Evergy’s TOU Campaign Examples:**

- 15 ▪ **Customer Outreach Events:** Evergy conducted more than 70 individual
16 outreach events, primarily targeting income-eligible and senior customers,
17 across the first three phases of the campaign. These events included both
18 those hosted by Evergy and those organized in collaboration with partner
19 agencies such as Raytown Christian Church and North Kansas City YMCA,
20 as well as numerous neighborhood associations and senior apartment
21 complexes. Evergy also ensured representation at events with
22 predominantly Spanish-speaking audiences by deploying Spanish-speaking
23 employees and actively engaging with Spanish-speaking communities.

- 1 ▪ **Food Pantries and Library Handout Distribution:** Evergy partnered with
2 food pantries and libraries throughout our service area to conduct outreach
3 events and distribute informational materials. More than 25 food pantry
4 locations received TOU handout materials to be included in food boxes, and
5 nearly 40 library locations were provided informational materials to share
6 with customers.
- 7 ▪ **Newspaper Ads and Church Bulletins:** To reach non-digital and rural
8 audiences, Evergy utilized advertisements in local newspapers and church
9 bulletins, recognized as important information sources in rural areas.
- 10 ▪ **Partner Trainings:** Evergy conducted multiple training sessions with
11 agency partners, particularly those serving the income-eligible audience,
12 enabling them to provide informed guidance to their clients regarding rate
13 options and mechanics.

14 **Recommendation 4:** “Use messaging that doesn’t rely (solely) on text”

15 **Evergy’s TOU Campaign Examples:**

- 16 ▪ **Videos:** Evergy created 10 different videos to help support the campaign,
17 including an overview video, 4 videos for each rate plan, two informational
18 training videos (one in English and one in Spanish) and 3 videos for digital
19 ads to explain how TOU works. These videos were used on our website, in
20 paid digital ads, at outreach events and to help train agency partners on
21 TOU.
- 22 ▪ **Graphics:** Evergy created unique, simple graphics for each TOU rate to
23 help explain how the rate works.

1 **Recommendation 5:** “Provide individualized information based on historic usage”

2 **Evergy’s TOU Campaign Examples:**

- 3 ▪ **Rate Education Reports:** Evergy mailed customers a Rate Education
4 Report and sent a version by email. These reports provided customers a
5 personalized look at what each plan might cost based on the customer’s own
6 past usage history. The reports also provided TOU educational savings tips.
- 7 ▪ **Rate Comparison Tool:** This tool, crucial for helping customers
8 understand the bill impacts of new TOU plans, provided a breakdown of
9 expected costs based on past billing data, and resulted in a significant
10 increase in customer engagement throughout the campaign.

11 Comment from MEEAC presenter: “*I am an Evergy customer, and I know they*
12 *have done that with the Time of Use rollout.*” – (A. Wilson, June 5th, 2024, MEEAC Zoom
13 *meeting recording*)

14 **Recommendation 6:** “Create accessible materials for all users, techniques for older adults
15 and people of low vision”

16 **Evergy TOU Campaign Examples:**

- 17 ▪ **Design:** Evergy’s designed team used ADA standards, including font style,
18 font size, and colors when creating materials for customers.
- 19 ▪ **Connect Center:** Evergy used our in-person walk-in center to provide
20 customers a place to ask additional questions about their TOU rate options.
21 Evergy dedicated a customer service agent to work a special TOU table at
22 the Connect center to provide education on TOU to customers who may
23 have stopped by for other issues.

1 Q: Does that conclude your testimony?

2 A: Yes, it does.

**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 Authority to) Case No. ER-2024-0189
Implement A General Rate Increase for Electric)
Service)

AFFIDAVIT OF KATIE R. MCDONALD


STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Katie R. McDonald, being first duly sworn on his oath, states:

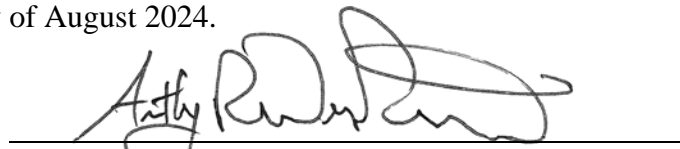
1. My name is Katie R. McDonald. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Vice President of Public Affairs.

2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of Evergy Missouri West consisting of forty-six (46) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

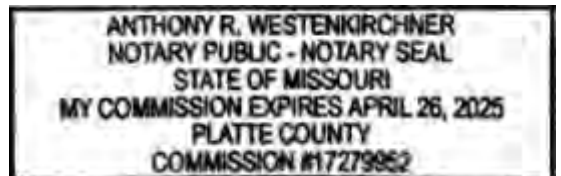
3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.


Katie R. McDonald

Subscribed and sworn before me this 6th day of August 2024.


Notary Public

My commission expires: 4/26/2025



Based upon a review of the videos from the relevant Agenda Meetings and On-the-Record presentations in EW-2023-0199, below are Commissioner comments transcribed from the videos.

August 10, 2023—Agenda Meeting

Rupp: “Your website is very nice.” 1:54:33¹

Rupp: “You are going to have the most educated customers for a utility in the country.” 2:03:18

Rupp: “Thank you for your time and for the detailed presentation. Greatly appreciated. This was excellent data and look forward to the data.” 2:04

Holsman: “Thank you, wonderful.” 2:04

November 28, 2023—On-the-Record Presentation

Kolkmeier: “Chuck and Katie, thank you for your presentation. It was very informational.” 1:05

Rupp: “I don’t have any questions. I have asked my questions. But I do have some comments. I appreciate this data. There is a lot of hyperbole—a lot of stuff was out in the media, and stuff, and we are starting to see the real numbers, we are beyond projections, we are beyond speculations, and the numbers are coming in. Very pleased with the numbers. 155,000 people went in and made a proactive choice what they believed was the best.

You are growing your digital engagement, you are having a better educated, a more informed consumer and I think you are right Chuck when you said six months from now a lot of this will not even be in issue. They are going to settle into the new rate and I think it will be fascinating to watch this as it moves forward, and I appreciate your anecdote about the change when you do energy efficiency and what you saw there, and what we are seeing there, and I hope as we continue to move down and get this data, people are going to continue to educate themselves. I think it’s great that you are going to peel back on the mass media and go much more to the direct engagement with the customer. I think you get a lot less blow back, a lot less ancillary things, and even the stuff we were seeing here with the mass media and a lot of the communication and the complaints we were getting were from non-Evergy customers. It wasn’t even their area, and in some of that, so they didn’t have access to the information. But it’s really looking like when people have access to the information they are making choices that they believe are the best for their family, and whether or not that choice changes or migrates that is to be seen, but I think the data you are collecting is exactly what we were looking for, so I commend you on that. I know this is a data rich, this is a gold mine for utilities across the country so the more you are open with the data to share with other utilities on your experience, so that they can glean that the

¹ The time refers to the time on the video of the presentation.

experts thought that we were looking at one, maybe a high of 3%, and you are at 30% in a short period of time, I think it is going to change the bar of the conversation nationwide, and I think Everygy will be the leader in that space. You will be able to provide real data to other organizations that can help them choose what they believe is best for their customers, I appreciate the data, I appreciate your openness, keep it coming, so we can actually see how this is working as the rubber hits the road.” 1:06 - 1:09

January 22, 2024—On-the-Record Presentation (virtual)

Rupp: “Yeah, I will thank the Company for the amount of data that you have been sharing. It has been extremely insightful and very helpful for all the parties to see as we’ve gone through this process.

So your willingness (“we kinda made you”) but you are doing it with a smile which is nice, but sharing that information we see these trends and flesh out what’s actually happening versus the boogeyman around the corner or overly hopeful projections and stuff, the data is very insightful and it’s helpful...

I firmly believe that these have been extremely helpful for the Commission and so I look forward to the next one in April. . . “

1:47:49

Kolkmeier: “I thank everyone and second the Chairman’s comments and thank the Company for bringing this information forward. It has been very helpful. Thank you.”

1:49

April 2, 2024—On-the-Record Presentation

Rupp: “You guys are doing a very good job of getting customer awareness out there. What have you found is the most effective tool from going awareness to action?”

1:02

Kolkmeier: “I just want to commend the Company for this presentation. I was kind of vocal last time we weren’t getting any new information. So I want to thank the Company for bringing some new information. So thank you very much.”

1:20



Education and Awareness Strategy

Strategy Overview: Use a phased approach, that incorporates both mass awareness and direct marketing tactics, to move a customer from awareness to action and then finally to transition and success.

Campaign Phase	Objective	Message Idea	Tactic Type
Phase 1 Awareness & Education June 15 th – Nov. 30 th , 2023	Inform customers that Missouri is changing rate structures soon and educate them on how TOU rates work.	Missouri will be changing electric rate structures starting this Fall. Learn how to prepare.	Mass Awareness
Phase 2 Action & Preparation Aug. 1 st – Nov. 30 th , 2023	Prepare customers for the upcoming change, inform them of their rate options & how they work, and encourage pre-selection of a rate.	As Missouri moves to TOU rates, Everygy is offering new personal power plans. Learn about your plan options and select a plan before October.	Mass Awareness and Direct
Phase 3 Transition & Coaching Oct. 1 st – Dec. 31 st , 2023	Ensure customers know they will be defaulted into a new rate and provide coaching to help them be successful on the new plan.	Your rate will change on X date. We are here to support your transition to TOU.	Direct
Phase 4 Success & Coaching Jan. 1 st – April 30 th , 2024	Help customers understand how their rate works and encourage shifting usage to off-peak times.	Your new rate allows you to save money by shifting to off-peak times. Here are tips and tricks to help you save.	Direct
Phase 5 Summer Prep & Coaching May 1 st – Sept. 30 th , 2024	Prepare customers for the change in summer pricing and provide tools, tips, and resources to avoid summer peak usage.	Prices change in the summer, start preparing your home and family to avoid high usage during the summer.	Mass Awareness and Direct



Campaign Phases

Mid-June	July	Aug.	Sept.	Oct	Nov.	Dec.
----------	------	------	-------	-----	------	------

Phase 1: Awareness & Education

June 15th – Nov. 30th

Phase Objective

Inform customers that Missouri is changing rate structures soon and educate them on how TOU rates work.

Main Message Idea

Missouri will be changing electric rate structures starting this Fall. Learn how to prepare.

Tactics

Out-of-Home, Social, Digital Display, Email, Bill Inserts/Message, Website, Media Relations, Search

Creative Approach

Text over branded background. CTA: Learn more at evergy.com

Phase 2: Action & Preparation

Aug. 1st – Nov. 30th

Phase Objective

Prepare customers for the upcoming change, inform them of their rate options & how they work, and encourage pre-selection of a rate.

Main Message Idea

As Missouri moves to TOU rates, Evergy is offering new personal power plans. Learn about your options & select a plan before Oct.

Tactics

Out-of-Home, Radio, Digital Display, Search, Social, Media Relations, Rate Education Reports, Direct Mail, Community Events & Special Group* 1:1 Support, Website

Creative Approach

Addition of lifestyle images and rate plan creative. CTA: select your rate now.

Phase 3: Transition & Coaching

Oct. 1st – Dec. 31st

Phase Objective

Ensure customers know they will be defaulted into a new rate and provide coaching to help them be successful on the new plan.

Main Message Idea

Your rate will change on X date. We are here to support your transition to TOU.

Tactics

Direct Mail, Email, Energy Coach Emails and Weekly Reports, Community Events & Special Group* 1:1 Support

Creative Approach

Energy Coach and detailed plan information.

Q1 2024	Q2 2024	Q3 2024	Q4 2024
---------	---------	---------	---------

Phase 4: Success & Coaching

Jan. 1st – April 30th, 2024

Phase Objective

Help customers understand how their rate works and encourage shifting usage to off-peak times.

Main Message Idea

Your new rate allows you to save money by shifting to off-peak times. Here are tips and tricks to help you save.

Tactics

Email, Direct Mail, Bill Inserts, Search, Digital, Energy Coach Emails, Rate Education Report, Special Group* 1:1 Support

Phase 5: Summer Prep & Coaching

May 1st – Sept. 30th, 2024

Phase Objective

Prepare customers for the change in summer pricing and provide tools, tips, and resources to avoid summer peak usage.

Main Message Idea

Prices change in the summer, start preparing your home and family to avoid high usage during the summer peak.

Tactics

Out-of-Home, Radio, Social, Email, Bill inserts, Direct Mail, Special Group* 1:1 Support

* Includes income-eligible, seniors, electric-heat customers



2023 Tactics and Audience Summary

Channel	General Audience	Low Income	Seniors	Hard-to-Reach			Electric Heat Customers	Net-Meter Customers
				Rural	Non-Digital	Less Energy Engaged		
Paid								
Out-of-Home								
Traditional Billboards	X							
Posters	X	X		X	X	X		
Print								
Newspapers	X			X	X			
Church Bulletins	X		X	X	X			
Audio								
Non-Metro Radio	X		X	X	X			
Streaming Audio	X	X				X		
Digital & Social								
Programmatic Display	X	X				X		
High Impact Display	X	X				X		
Digital Video	X	X				X		
Social Video	X			X		X		
Social Image	X			X		X		
Paid Search	X	X		X		X		
Earned								
Media Outreach	x		x	x	x	x		
Community Events	x	x	x	x	x	x		
Connect Center	x	x	x		x			
Shared								
Video	x	x						
Organic Social	x			x				
Owned								
Email	x	x		x			x	x
Website	x	x						x
Rate Education Reports	x			x	x	x	x	
Direct Mail	x	x	x	x	x		x	x
Bill Message and Inserts	x	x		x	x			