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Issue: TOU engagement and education Witness: Katie R. McDonald

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Date Testimony Prepared: September 10, 2024

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. ER-2024-0189

SURREBUTTAL TESTIMONY

OF

KATIE R. MCDONALD

ON BEHALF OF

EVERGY MISSOURI WEST

Kansas City, Missouri September 2024

SURREBUTTAL 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,
3		Missouri 64105.
4	Q:	Are you the same Katie R. McDonald who filed rebuttal testimony in this
5		docket on August 6, 2024?
6	A:	I am.
7	Q:	Who are you testifying for?
8	A:	I am testifying on behalf of Evergy Missouri West, Inc. d/b/a Evergy Missouri West
9		("EMW" or "Company").
10	Q:	What is the purpose of your testimony?
11	A:	The purpose of my surrebuttal testimony is to address OPC witness Lisa Kremer's
12		rebuttal testimony focused on Evergy's TOU education and outreach campaign.
13		Ms. Kremer's rebuttal testimony concludes that Evergy didn't adequately educate
14		our customers on TOU. My surrebuttal testimony provides the additional
15		information and results to dispute that conclusion.
16		Additionally, Ms. Kremer mischaracterizes Evergy's Intelligent Voice
17		Assistant (IVA) system, specifically relative to the TOU implementation. My
18		testimony seeks to explain the IVA design and purpose of the IVA as a tool we use
19		to serve customers more effectively.

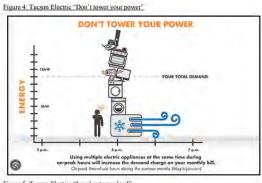
In an attempt to support her argument that Evergy did not adequately educate customers on TOU, Ms. Kremer asserts that Evergy should have utilized illustrations similar to those provided by the OPC to highlight the relationship between timing and energy usage. Did Evergy consider or incorporate such illustrations in its education campaign?

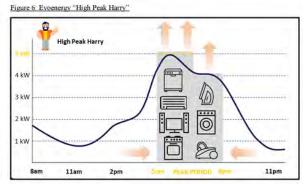
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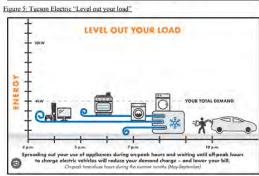
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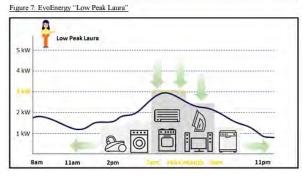
Yes. Not only did we consider the illustrations provided by OPC, but we designed our version based on OPC's examples. Once again, it appears Ms. Kremer has not reviewed the full campaign materials, as she continues to make unfounded accusations without examining the facts or many of the materials provided to show the full breadth of the education campaign. If Ms. Kremer had reviewed the campaign materials, which Evergy provided monthly in Case EW-2023-0199, she would have clearly seen that Evergy did indeed use illustrations very similar to those suggested by the OPC, contrary to her claims. Additionally, in *Evergy's Reply to Comments from the Office of Public Counsel* in Case EW-2023-0199, regarding this suggestion, Evergy informed OPC that we would use similar illustrations in our materials, which we did. This is another example of how Evergy collaborated with Staff and the OPC, incorporating many of their suggestions.

Here are the example illustrations OPC suggested to Evergy, which OPC took from Tucson Electric and Evoenergy:





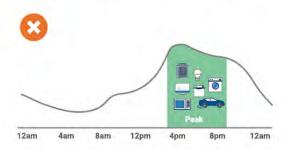


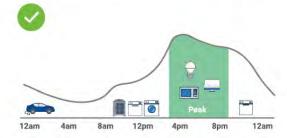


Now, here are the illustrations Evergy used in our TOU campaign:

Don't use all your major appliances during the peak hours when energy costs are higher.

Do shift a few of your major appliances to off-peak times to save on your energy costs.

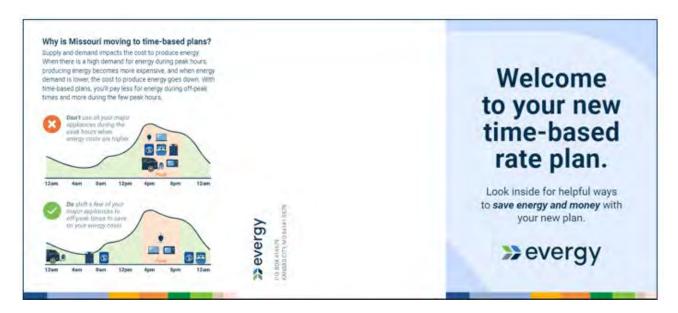




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1 As an example, here is how the illustrations were used in our TOU Welcome Kit, 2 which was sent by mail to every Evergy Residential customer in Missouri:



As demonstrated, Evergy not only used the illustrations suggested by the OPC but also created illustrations so similar to the examples provided by the OPC that it is difficult to distinguish between them. These illustrations were utilized throughout the campaign on our website, in letters sent to customers, in customer emails, the TOU Welcome Kit, and many other materials.

As mentioned, Evergy provided these examples to the OPC on a monthly basis. For instance, I refer to the February 2024 Monthly TOU Report filed in Case EW-2023-0199, and direct the OPC and the Commission to the following pages from that report, where they can see the illustrations in use in our educational materials:

- Slide 59: Examples of Special Group Customer Outreach Journey
- Slide 62: Materials sent to Customer Enrolled in Average Payment
 Plan

1		Slide 67: Rate Webpage Examples			
2		 Slide 92: September Customer Postcard 			
3		■ Slide 96: Electric Heat Customer Letter			
4		■ Slide 99: Low Income and Senior Letter			
5		■ Slide 101: Non-Digital Customer Letter			
6		■ Slide 105: Letter to TOU Pilot Customers			
7		■ Slide 107: Request for Information Packet			
8		 Slide 113: Default Plan Change Letter 			
9		■ Slide 116: TOU Welcome Kit			
10		 Slide 118: November Bill Insert 			
11		■ Slide 120: Welcome to Your New Rate Email			
12		The continued claims by Ms. Kremer that we did not work with OPC or take their			
13		suggestions is false.			
14	Q:	Ms. Kremer states that she recommended to Evergy that the Company			
15		promote more of the educational benefits of TOU in its education efforts, did			
16		the Company do that?			
17	A:	Yes, we did. Ms. Kremer continues to rely solely on materials created in early Phase			
18		1 of our five-phase education campaign when making her accusations, rather than			
19		looking at the full breadth of materials throughout the campaign. In my Rebuttal			
20		testimony, I previously outlined Evergy's campaign approach and how we utilized			
21		the Awareness, Interest, Desire, and Action (AIDA) model to transition customers			
22		from awareness to understanding and education. Ms. Kremer's testimony and			
23		examples focus only on Phase 1 materials, which were developed to raise awareness			

of the upcoming changes. This approach allowed Evergy to gain customer mindshare and establish baseline awareness regarding the transition to TOU rates. During Phases 2-5 of our TOU campaign, Evergy employed more detailed messaging and one-to-one marketing tactics to build upon the awareness gained in Phase 1, helping customers develop a deeper understanding of TOU rate options, the reasons behind Evergy's transition to TOU rates, and how they could successfully manage their rate plans.

Ms. Kremer's claim that Evergy only focused on awareness measurements is not only untrue but also fails to account for the multiple measurement dashboards provided monthly to the OPC in Case No. EW-2023-0199. These dashboards clearly show that we are tracking awareness and customer understanding, along with individual channel performance and customer actions. To correct the record, in addition to high awareness, research indicated that by Phase 3, more than 60 percent of customers correctly understood the main features of TOU rates, such as paying more for electricity during peak hours and less during off-peak hours.

Furthermore, more than 40 percent of surveyed customers expressed satisfaction with their level of knowledge on TOU rates and indicated that they needed no further information on the topic. When asked about their beliefs regarding time-based plans, most customers correctly identified the key aspects, demonstrating their education on the plans and TOU. Customer familiarity with the plans increased throughout the campaign, with 82% being familiar with the plans by the end of 2023. Those indicating they knew "a lot" or "a good amount"

increased significantly by seven percentage points in Wave 3 of our third-party research.

Q:

A:

Ms. Kremer says that while the Company may have been successful in getting awareness of TOU, that it's not the same as education.

I agree that awareness and education are not the same thing and that Evergy was successful in both areas -- getting high awareness of TOU rates and has also been successful in educating customers about TOU. As I've outlined in both my Rebuttal and in this Surrebuttal testimony, Ms. Kremer continues to review only a small percentage of the campaign materials and results. By selectively omitting campaign research findings and failing to review all education materials, Ms. Kremer is creating a false narrative regarding our customer education and the results. Evergy developed a comprehensive, multi-faceted surround-sound outreach and education campaign, strategically designed to engage and educate customers. The campaign included multiple touchpoints, communication tactics and channels, and bilingual messaging in both English and Spanish. We developed a campaign that would reach all Evergy customers while also prioritizing engagement efforts for special customer groups including seniors, income-eligible individuals, households relying on electric heating, and those less digitally inclined.

Throughout their testimony in this case, OPC continues to provide examples of illustrations, videos, tactics, and messaging that they suggested would have been effective in educating customers on TOU rates. The problem is, as proven in my testimony, Evergy has implemented almost all of those suggestions and tactics. We used OPC's suggested illustrations, developed OPC's suggested videos, conducted

OPC's recommended outreach tactics like Food Banks and Libraries, and used much of OPC's messaging suggestions. To say that Evergy wasn't successful in educating customers would mean that either OPC gave recommendations that didn't work or that Evergy was effective in educating customers -- Ms. Kremer can't have it both ways. Either way, she continues to provide testimony that isn't based on the facts of the campaign materials or research results.

0:

A:

Ms. Kremer says a study that shows customers were concerned about switching to TOU proves that customers weren't educated about TOU and that it means the company failed. Do you agree?

I respectfully disagree and refer to Mr. Caisley's Rebuttal testimony on page 26, where he addresses this question. Additionally, the Alliance to Save Energy must also disagree with Ms. Kremer, as the organization in August 2024 awarded Evergy's TOU campaign the "Community Engagement and Education Award," which honors "exceptional efforts in educating communities on energy-related topics."

Furthermore, Ms. Kremer continues to confuse customer satisfaction with effective customer education, and her interpretation of the research results is incorrect. This flawed reasoning is misleading and can lead to faulty conclusions, as demonstrated in her rebuttal testimony. There is a reason Evergy included both customer satisfaction and customer education questions in our measurement and surveying approach, as these are clearly distinct metrics.

In her testimony, Ms. Kremer omits the fact that when customers were asked about their concerns, the reason was not a lack of education on the topic. "I

don't know enough about TOU" was one of the least cited reasons for customer concerns. The primary concern was the potential increase in their bills, which was indeed the case for some customers. As a mother and someone who diligently manages household expenses, I understand that having early concerns about potential bill impacts is logical, even for those well-educated about TOU. Customers, especially those in the Show-Me State, need time to see how their energy bills are affected by the new rate.

Q:

A:

Ms. Kremer points to Escalent and JD Power studies that show lower brand trust for Evergy and she cited a statement that utilities that spend more on communications score better, does that surprise you?

Based on past JD Power research, it was anticipated that customer satisfaction would decline when customers are transitioned to TOU rates. Both historical and current TOU research indicate that customers required to switch to TOU rates, regardless of the effectiveness of the communication campaign, tend to have a more unfavorable opinion of their utility as a result.

This trend was expected, as evidenced by the JD Power 2019 Utility Industry Outlook, which found that "...when pricing options are forced on electric utility customers, they respond with significantly lower customer satisfaction scores." JD Power found that Ontario saw a 70-point price index decline between customers who they moved to TOU rates and those still on the general rate plan. Similarly, California IOUs reported lower customer satisfaction when customers were placed on a TOU rate, despite varying education and marketing plans across the different utilities. Additionally, Evergy's 2022 Rate Research demonstrated that

customers would view Evergy less favorably if mandated to adopt TOU pricing. For further details, please refer to DR 8003 in case ET-2024-0061 which I have attached to my testimony as **Schedule KRM-4**.

Q:

A:

Moreover, it is well-documented that utilities investing more in marketing and advertising tend to achieve higher customer satisfaction scores. While I acknowledge the importance of customer marketing, Evergy has consistently adopted a conservative approach in spending customer dollars on advertising. Unlike many utility peers, Evergy focuses mostly on informational, public service announcement-style advertising to balance cost increases for our customers.

As for the Escalent study referenced by OPC, the Company does not subscribe to this service. However, I will note that from my review of the Escalent material that is available to the public, Evergy's scores Evergy's score of 627 is between 500 (Average) and 1,000 (Extremely satisfied) so customers rate their satisfaction with the Company as above average.

Ms. Kremer in her testimony accuses Evergy of switching its "why" messaging from "matching usage to energy costs" in July to "attributing the change to a mandate from MPSC" in August. Is this accurate?

No, this is not accurate. As evident in our campaign materials that were filed and shared throughout the campaign, Evergy continued to use messaging around "matching energy usage with energy costs" throughout the campaign, especially into the Fall of 2023, as shown in a number of campaign examples shared with OPC in Case No. EW-2023-0199.

To help illustrate this point, below are examples of the messaging used on customer
bill inserts for July, August, and September 2023. (Examples from EW-2023-0199,
TOU Commission Report Request Feb. 2024, campaign examples)

July 2023 Bill Insert – Feb. 2024 TOU Commission Report, page 73 "By switching to time-based rates, Missouri is working to match the cost you pay with the actual costs to produce energy. With time-based rate plans, you'll pay less for energy during off-peak times, when demand for energy is lower, and more for energy used during the peak hours of 4-8pm."

"The goal of time-based rates is to match the costs you pay with the actual costs to produce energy. With time-based rate plans, you'll pay less for energy used during off-peak times, when demand for energy is lower, and more for energy used during the peak hours of 4-8 pm. With time-based rate plans, you can take advantage of discounted off-peak pricing by shifting your large appliance usage, like dishwasher and clothes drying, to off-peak hours."

September 2023 Bill Insert – Feb. 2024 TOU Commission Report, page 93

"The goal of time-based rates is to match the costs you pay with the actual costs to produce energy. With time-based rate plans, you'll pay less for energy used during off-peak times, when demand for energy is lower, and more for energy used during the peak hours of 4-8 pm. With time-based rates, you'll pay less for any energy used during the 20 off-peak hours. But

1		when energy demand is high during peak hours, the cost for energy will be
2		higher."
3		As demonstrated by these three examples, Evergy not only maintained its
4		messaging about the purpose of TOU rates - to align energy usage with energy
5		costs - but actually increased the amount of messaging on this topic as we
6		transitioned into the Fall of 2023.
7	Q:	Ms. Kremer says that the Company did not use our consultant's suggestions
8		for messaging and instead chose to blame the MPSC, do you agree?
9	A:	No. Ms. Kremer's assumption that Evergy did not incorporate recommendations
10		and advice from the communication consultant in developing our TOU educational
11		strategy and messaging is misguided. As Ms. Kremer herself notes, the consultant's
12		research provided several recommended messages for our campaign, most of which
13		were indeed utilized in our materials. Some of the top recommendations included:
14 15		• Consultant Message Recommendation: Offered customer choice about their electricity rate plan
16		 Evergy's Messaging Examples:
17 18		"Missouri customers will have a choice of four new rate plan options." (Newspaper ads, brochures)
19 20 21		"It's time to choose your new time-based rate plan." "so Evergy has introduced four new rate plan options to fit your household needs." "Choose your new plan now!" (Bill insert)
22 23 24		"Choose your new plan by October" "It's time to choose your new time-based rate plan." "To help you choose the best plan for your household" (Postcard)
25 26		• Consultant Message Recommendation: Highlight when customers use electricity is just as important as how much electricity they use
27		 Evergy's Messaging Examples:

1 2 3	"With this change to time-based rates, it will be important to monitor not only how much energy you use but also when you use it, to save on your monthly bill" (Customer Letter)
4 5	• Consultant Message Recommendation: Share that Time of Use rate plans help protect the electricity system for everyone
6	 Evergy's Messaging Examples:
7	Why is Missouri changing? (Website)
8 9 10 11 12	Timing plays a crucial role in energy, especially when it comes to cost. As energy demand rises, the cost of generating electricity also increases. This usually happens during peak hours of 4-8 pm. During off-peak times (usually in the early morning and overnight) energy demand goes down, which means lower energy costs.
13 14 15	At the same time, reducing energy usage during high-demand times (like hot summer weekdays) also helps lower the strain on the energy grid.
16 17 18	Together, we can embrace the change in Missouri to time-based rate plans and unlock the potential for savings while making a positive impact on our environment and energy grid.
19 20 21 22 23 24	Why is Missouri changing to time-based rates? (Newspaper Ads) Timing is everything when it comes to energy costs. Time-based rates match the cost you pay with the actual cost to produce energy. With time-based rate plans, you'll pay less for energy during offpeak times, when demand for energy is lower, and more for energy used during the peak hours of 4-8pm.
25 26 27 28 29 30 31	Why is Missouri changing to time-based rates? (Bill Insert) Timing is everything when it comes to energy costs. By switching to time-based rates, Missouri is working to match the cost you pay with the actual costs to produce energy. With time-based rate plans, you'll pay less for energy during off-peak times, when demand for energy is lower, and more for energy used during peak hours of 4-8pm.
32	Why is Missouri moving to time-based plans? (Letter)
33 34 35 36 37	Supply and demand play an important part in the overall cost to produce energy. When there is a high demand for energy during the peak hours, producing energy becomes more expensive. On the other hand, when energy demand is lower, the cost to produce energy goes down. With the new time-based rate plans, you'll pay

less for energy during the off-peak times, which are most of the time, and more during the few peak hours.

As illustrated in these educational materials, Evergy did indeed incorporate the consultant's top recommendations into our communications strategy and materials.

Furthermore, Evergy has never blamed the MPSC for TOU. Only a fraction of the materials used throughout our campaign mentioned the MPSC. As Mr. Caisley noted in his Rebuttal, the then Chairman of the Commission himself stated in media interviews that this change resulted from a Commission Order. Our messaging was informative and factually correct, never attributing blame to any party. The Staff uses very similar language in their own TOU "Frequently Asked Questions" document, posted on the MPSC website for customers, which states,

Evergy was ordered to transition all residential customers to time-based rate plans in the period of October-December, 2023" and "The Missouri Public Service Commission has entered orders and approved tariffs to transition almost all residential electric customers of regulated utilities to Time-Based rates. Ameren and Liberty transitions are occurring on their own timelines and their own processes are governed by different orders and tariffs than the Evergy Missouri Metro and Evergy Missouri West processes.

Additionally, since customers were aware of our past campaign and the optional TOU rate, which the consultant's messaging study did not account for, it was crucial that customers understood that the time-based rate plans were no longer optional. It was important for customers to understand that they knew the new TOU plans were now required and that they would need to select a TOU plan or Evergy would assign them to one.

1	Q:	Ms. Kremer makes a blanket statement on page 19 of her rebuttal testimony				
2		that claims the "Company's IVA was not able to adequately serve customers				
3		during the TOU transition. Do you agree with this statement?"				
4	A:	No. Ms. Kremer states, "Perhaps had the Company been prepared to better serve				
5		its customers during the TOU transition, answer its phone, and be available to its				
6		customers it would not have experienced the declines in the customer satisfaction				
7		that the Company points to." This is conjecture. I've explained the rationale for the				
8		decline in customer satisfaction in my testimony, and Chuck Caisley has done so				
9		as well.				
10		The IVA worked as designed during the TOU transition. During call center hours,				
11		it routed callers to a CSR if they either asked for a CSR or indicated they had a rate				
12		or TOU need. As it has always done for after hours calls, it indicated the hours				
13		during which a customer could call back to speak to a CSR.				
14	Q:	Was the IVA intended to explain the TOU rates in detail?				
15	A:	No. The IVA is well-suited to give relatively simple information and handle				
16		common transactions. It is not an appropriate vehicle to explain complex				
17		information such as TOU rates, especially with multiple rate options. We designed				
18		the system to quickly transfer a customer to a CSR once it determines that there is				
19		a rate question or need.				
20	Q:	Was the IVA intended to help a customer navigate the TOU options and decide				
21		upon a TOU rate?				

No. As mentioned above, the IVA is not well-suited for complex rate information

and helping a customer decide about a TOU rate. We designed the system to quickly

22

23

A:

transfer a customer to a CSR to explain TOU options and help them make that decision.

Q: Was the IVA designed to avoid a conversation with a CSR about TOU?

A:

4 A: No. In relation to TOU, we designed the IVA flow to quickly get a customer into a conversation with a CSR.

Q: What did the IVA do if a customer indicated they wanted to talk to a CSR about TOU?

In the IVA, we first ask if the customer would like to receive a text with a link to our website where they could see the options and read an explanation. We felt this would help a customer visualize what a CSR would explain during the call. The chart below shows the numbers of customers who indicated they would like to receive a text. The customer then has the opportunity to transfer to the call queue where a CSR would pick up the call. The chart below shows the transfers by month.

Customers indicating they would like to be receive a text with a link to TOU information on our website:

	Percent of TOU intents vs Total Calls			Combined Dedicated & General #				
2023	Total Calls	Calls with TOU Intent	% of TOU calls vs Total calls	Total TOU Calls	Incoming Calls Offered SMS	SMS Sent	% SMS Sent	
June 19th- EOM	214,913	228	0.10%	228	228	38	16.70%	
July	290,486	660	0.20%	660	660	98	14.80%	
August	299,597	15,400	5.10%	15,400	15,400	1,607	10.40%	
Sept	301,878	26,185	8.70%	26,185	26,185	3,040	11.60%	
October	259,856	14,410	5.50%	14,410	14,410	1,575	10.90%	
November	199,273	2,088	1.00%	2,088	2088	261	12.50%	
December	181,073	808	0.40%	808	808	164	20.30%	

Customers immediately asking the IVA for a CSR:

2023	Ask for CSR	Total Calls to IVA	% Asking for CSR
January	17,761	191,282	9.3%
February	17,816	184,386	9.7%
March	23,585	209,481	11.3%
April	22,430	191,189	11.7%
May	26,863	208,606	12.9%
June	27,258	214,913	12.7%
July	32,146	290,486	11.1%
August	44,140	299,597	14.7%
September	45,539	301,878	15.1%
October	38,329	259,856	14.8%
November	23,643	199,273	11.9%
December	20,712	181,073	11.4%

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Q: What did the IVA do if a customer indicated they wanted to talk to a CSR?

A: Many customers call and immediately say to our IVA that they want to talk to a CSR. We always ask a clarifying question to get them to the right CSR skillset and if the IVA can help them with their issue, we ask if they would like the IVA to help them. If they ask for a CSR a second time, they are transferred to the call queue where a CSR will pick up the call.

The IVA served customers perfectly to route them to the right agents who were well trained and available to talk to them about TOU.

12 Q: Does that conclude your testimony?

13 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 Surrebuttal Testimony on behalf of Evergy Missouri West consisting of seventeen (17) 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 10th day of August 2024.

Notary Public

My commission expires: 4/2u/w25

NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 26, 2025
PLATTE COUNTY



Evergy MO Metro and MO West Case Name: Approval of Tariff Revisions to TOU Program Case Number: ET-2024-0061

Requestor - OPC_20230911

Question:8003

Is it Evergy's position that the requirement to switch customers to TOU rates is causing a decline in customer satisfaction? Please provide a detailed explanation regarding Evergy's position on what is causing a decline in the satisfaction with Evergy

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

Yes. Early data from surveying customers in June 2022 showed overwhelming customer opposition to switching to a mandated TOU rate. The Rate Options research surveyed 958 MO residential customers about their support of mandated TOU. This research was provided during the rate case in testimony and subsequently detailed in data requests.

- 74% of customers said they would not support mandated TOU
- 58% indicated they would be less satisfied with Evergy with mandated TOU
- 69% indicated they would be less satisfied with the MPSC with mandated TOU

This year, Evergy has surveyed 2,090 customers since June 2023 (ranging from 600-800 surveyed per month) to gauge their reaction to the mandatory move to TOU rates. The monthly TOU Rate survey shows from the first survey in June (when mandatory TOU messaging began) to August, a steady decline in customer satisfaction as awareness of the rates increases, with the sharpest decline (-17%) in the number of customers who are Very or Extremely satisfied. Additionally, the number of customers who are dissatisfied doubled from June (7%) to August (14%).

Also, in the monthly TOU rate survey 49% of Evergy customers indicate they now have an unfavorable opinion of Evergy based on the mandatory switch to TOU.

Information provided by: Cari Ferrara, Marketing

Attachment(s):