

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

In The Matter of A Proposed Rulemaking)
to Promulgate a New Rule Regarding a) Case No. AX-2023-0175
Residential customer Disconnection Data)
Reporting Rule)

EVERGY COMMENTS

COMES NOW Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) (collectively, the “Company”), and state:

1. On November 30, 2022, the Office of Public Counsel (“OPC”) and the Missouri Public Service Commission Staff (“Staff”) filed a Motion requesting that the Missouri Public Service Commission (“Commission”) open a rulemaking docket to consider the promulgation of a new rule requiring certain electrical corporations, gas corporations, sewer corporations, and water corporations to submit monthly reports identifying categories of information related to customer disconnection data.

2. On March 29, 2023 the Commission issued its *Finding of Necessity and Order Directing the Proposed Rule 20 CSR 4240-13.075 Be Filed for Publication*, and the proposed rule was published in the Missouri Register on June 15, 2023.

3. On June 16, 2023, the Commission issued a *Notice of Rulemaking Hearing* and requested the submission of written comments regarding the rule by July 15, 2023.

4. The Company appreciates the opportunity to provide comments, and the purpose of this filing is to raise two points regarding the proposed rule. First, Evergy participated in OPC’s voluntary case study as described below and has indicated throughout the voluntary case study process how the Company interprets the proposed rule language as well as the reporting methodology

the Company intends to use to support its data to meet the reporting requirements. No objections or concerns were raised regarding the Company’s interpretation. If the proposed rule is approved, the Company intends to comply with the rule in the format provided in **Exhibit 1**.

5. Second, in the final version of the proposed rule, new language was added to the proposed rule. Section 2(L), *any other information the commission orders the utility to provide*, was added. The Company is unclear why this language needs to be included in the rule as the Commission already has the authority to direct the Company to provide information, as needed. Additionally, the Company would like to highlight that while it understands that there may be times where the Commission needs further information, it is important to note that there may be challenges with the availability of the information requested and/or the timeliness for providing the information as described by the rule.

BACKGROUND

6. On November 25, 2019, OPC filed a *Motion to Open a Working Group Docket Regarding a Proposed Residential Customer Disconnection Data Reporting Rule*. On December 11, 2019, the Commission issued an *Order Opening a Working Case to Consider a Proposed Residential Customer Disconnection Data Reporting Rule* and directed interested stakeholders submit written comments for OPC’s proposed rule no later than February 14, 2020.

7. On February 14, 2020, Evergy submitted its response to OPC’s Memorandum and the proposed draft rule. The Company specifically raised the following in its response:

Overall, the reference to unique residential “accounts” brings more questions for clarity and how to properly track. An account in CCB can have multiple service agreements for various addresses. ...A single Account can be used to bill one, to many, Service Agreements, where each Service Agreement can be for one, to many, Service Points (Meters) for a given Premise location.

8. Due to the COVID-19 pandemic, the first workshop was held virtually on November 18, 2020. Following the workshop and comments from stakeholders, OPC made substantial

revisions to the proposed rule. The Company appreciates OPC's effort to incorporate feedback from stakeholders.

9. On February 25, 2022, the second workshop was held and Evergy raised that the overall reference to "residential meters" as presented in the revised proposed rule language brings more questions for clarity and how to properly track. It is critical that Evergy's reporting align with a service agreement account view as this is how the Company provides data to fulfill Evergy's existing reporting requirements.

10. Following the second workshop, OPC made further revisions to its proposed rule and filed a *Motion to Establish Deadline for Participation in a Voluntary One-Month Case Study* on March 4, 2022. The Commission issued an *Order Inviting Participation in Case Study* on March 7, 2022, directing utilities wishing to participate in the voluntary case study to submit data responsive to the revised draft rule no later than May 20, 2022.

11. Per the Commission's March 7, 2022, Order, Evergy submitted its data for the voluntary case study. The Company also included language clarifying the Company's reporting method used to support its data.

12. At OPC's request, a meeting was held June 10, 2022, to discuss Evergy's submission for the case study. At that time, the Company further explained its reporting methodology and its interpretation of the proposed rule. The Company also agreed to submit a revised report and its definitions for the data. On September 9, 2022, Evergy provided OPC with its revised report along with additional data for the month of July 2022 (see Exhibit 1). Again, this submission included language defining the data the Company intended to use to comply with the proposed rule.

13. The Company reiterates that it appreciates the opportunity to participate in this rulemaking and the collaborative efforts made by all parties. The Company questions whether 2(L) of the rule is needed and has concerns regarding the potential availability of information the

Commission may request and the timeliness in which the Company can provide additional information. Evergy can comply with the proposed rule so long as it can do so using the format provided in Exhibit 1.

WHEREFORE, the Company respectfully requests that the Commission accept these comments for consideration in determining the next steps regarding the proposed rule.

Respectfully submitted,

/s/ Roger W. Steiner

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**ATTORNEY FOR EVERGY MISSOURI
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WEST**

CERTIFICATE OF SERVICE

The undersigned certified that a true and correct copy of the foregoing document was sent by electronic transmission, facsimile, U.S. Mail or e-mail to counsel for all parties of record on this 14th day of July 2023.

/s/ Roger W. Steiner

Roger W. Steiner

OPC Report - Draft (Evergy)

The total number of residential meters as of 00:00 on the first calendar day of the calendar month;

A	Beginning of the Month Customer	April-22		July-22
	MO West	296,252		298,570
	MO Metro	263,817		268,882
	Total Residential	560,069		567,452

The total number of residential meters as of 24:00 on the last calendar day of the calendar month;

B	End of Month Customer Count	April-22		July-22
	MO West	297,254		299,864
	MO Metro	266,933		270,538
	Total Residential	564,187		570,402

The total number of residential meters for which there was a termination of service, as that term is defined in 20 CSR 4240-13.015(1)(EE), during the calendar month;

C	Number of Voluntary Disconnects (termination of service/customer turn off)		Revised	
		April-22	April-22	July-22
	MO West	5,494	5,333	6,354
	MO Metro	7,977	7,611	10,095
	Total Residential	13,471	12,944	16,449

The total number of residential meters for which there was a discontinuance of service, as that term is used in 20 CSR 4240-13.050(1)(A), (B), (C), and (E), during the calendar month;

D	Disconnected for Non-Pay		Revised	
		April-22	April-22	July-22
	MO West	1,161	1,171	963
	MO Metro	1,508	1,527	1,392
	Total Residential	2,669	2,698	2,355

The total number of residential meters that did not receive service as of 00:00 on the first calendar day of the calendar month and began receiving service before 24:00 on the last calendar day of the calendar month;

E	Customer Turn Ons		Revised	
		April-22	April-22	July-22
	MO West	1,991	5,843	7,033
	MO Metro	2,257	8,131	11,371
	Total Residential	4,248	13,974	18,404

The total number of residential meters for which at least one delinquent charge, as that term is defined in 20 CSR 4240-13.015(1)(I), exists as of 24:00 on the last calendar day of the calendar month;

F	Total Service Agreements in Arrears			
		April-22		July-22
	MO West	33,396		34,577
	MO Metro	40,469		41,601
	Total Residential	73,865		76,178

G	The average customer arrearage;		April-22		July-22
		MO West	\$ 210.25	\$	219.79
		MO Metro	\$ 239.06	\$	230.07

The total dollar value of any monies received from the federal government (to include, but not be limited to the Low-Income Home Energy Assistance Program or Low-Income Household Water Assistance Program) to pay for a residential meter's delinquent charge, as that term is defined in 20 CSR 4240-13.015(1)(I), during the calendar month;

H	Total LIHEAP & ECIP		April-22		July-22
		MO West	\$ 518,147	\$	442,755
		MO Metro	\$ 370,565	\$	157,717
		Total	\$ 888,712	\$	600,472

The total dollar value of any monies received from the state government to pay for a residential meter's delinquent charge, as that term is defined in 20 CSR 4240-13.015(1)(I), during the calendar month;

I	Total Other Energy Assistance		April-22		July-22
		MO West	\$ 119,558	\$	148,342
		MO Metro	\$ 416,142	\$	394,053
		Total	\$ 535,700	\$	542,395

The total number of residential meters for which payment is made for utility services under a payment agreement, as that term is defined in 20 CSR 4240-13.015(1)(W); settlement agreement, as that term is defined in 20 CSR 4240-13.015(1)(CC); or payment agreement, as that term is used in 20 CSR 4240-13.055(10), as of 24:00 on the last calendar day of the calendar month;

J	Total Number of customers on Pay Arrangements as of last day of the month		April-22		July-22
		MO West	10,294		8,626
		MO Metro	13,284		10,437
		Total	23,578		19,063

The mean average billed volume of services provided for all residential meters recorded during the calendar month in kilowatt-hours for electric services, centum cubic feet for gas services, and thousand gallons of water for water services.

K	Average KWH per residential customer		April-22		July-22
		MO West	831		1,372
		MO Metro	647		1,181

<u>Question</u>	<u>Energy Reporting Method</u>	<u>Notes</u>
(A) the total number of residential meters as of 00:00 on the first calendar day of the calendar month;	We are counting residential electric service agreements (SAs) which equal an active meter billing on a residential rate.	
(B) the total number of residential meters as of 24:00 on the last calendar day of the calendar month;	We are counting residential electric service agreements (SAs) which equal an active meter billing on a residential rate.	
(C) the total number of residential meters for which there was a termination of service, as that term is defined in 20 CSR 4240-13.015(1)(EE), during the calendar month;	Voluntary shut offs by the customer. We are counting number of Turn Off orders completed in the month. This includes back to back (BTB) and physical shut offs.	
(D) the total number of residential meters for which there was a discontinuance of service, as that term is used in 20 CSR 4240-13.050(1)(A), (B), (C), and (E), during the calendar month;	We are counting number of Disconnect for Non-Pay orders that are completed in the month.	
(E) the total number of residential meters that did not receive service as of 00:00 on the first calendar day of the calendar month and began receiving service before 24:00 on the last calendar day of the calendar month;	This is defined as Turn On orders requested by the customer. We are counting number of Turn On orders completed in the month. This includes back to back (BTB) and physical turn ons. This does not include reconnect orders if within 6 working days.	
(F) the total number of residential meters for which at least one delinquent charge, as that term is defined in 20 CSR 4240-13.015(1)(I), exists as of 24:00 on the last calendar day of the calendar month;	Using same definition as current AAO reporting. Service agreements (SA) in arrears over \$0.01 and more than 22 days past due.	
(G) the average customer arrearage;	Average arrears = \$\$ in arrears vs. service agreements in arrears	
(H) the total dollar value of any monies received from the federal government (to include, but not be limited to the Low-Income Home Energy Assistance Program or Low-Income Household Water Assistance Program) to pay for a residential meter's delinquent charge, as that term is defined in 20 CSR 4240-13.015(1)(I), during the calendar month;	Amount of dollars received on behalf of customers through LIHEAP & ECIP (Energy Crisis Intervention Program) programs.	
(I) the total dollar value of any monies received from the state government to pay for a residential meter's delinquent charge, as that term is defined in 20 CSR 4240-13.015(1)(I), during the calendar month;	Amount of dollars received on behalf of customers through other state/federal government programs (non-LIHEAP/ECIP).	Dollars here include: Salvation Army, Shelter Plus, Dollar-Aide, Section 8, Catholic Charities, Community Action Programs, Veteran's Assistance Funds, MAAC (Mid-America Assistance Coalition), ERAP (Emergency Rental Assistance Program), SAFHR (State Assistance for Housing Relief), etc.
(J) the total number of residential meters for which payment is made for utility services under a payment agreement, as that term is defined in 20 CSR 4240-13.015(1)(W); settlement agreement, as that term is defined in 20 CSR 4240-13.015(1)(CC); or payment agreement, as that term is used in 20 CSR 4240-13.055(10), as of 24:00 on the last calendar day of the calendar month; and	This is a point in time number and is counting active Payment arrangement service agreements.	
(K) the mean average billed volume of services provided for all residential meters recorded during the calendar month in kilowatt-hours for electric services, centum cubic feet for gas services, and thousand gallons of water for water services.	This is a calendar month of residential billed volume (not revenue month) and is divided number of residential customers.	