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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2022-0129 / 0130

REBUTTAL TESTIMONY

OF

CHARLES A. CAISLEY

ON BEHALF OF

EVERGY MISSOURI METRO and EVERGY MISSOURI WEST

**Kansas City, Missouri
July 2022**

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Case No. ER-2022-0129 / 0130

1 **I. INTRODUCTION**

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

3 A: My name is Charles A. Caisley. My business address is 1200 Main, Kansas City, Missouri
4 64105.

5 **Q: Are you the same Charles A. Caisley who submitted direct testimony in these dockets**
6 **on January 7, 2022?**

7 A: Yes.

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

9 A: I am testifying on behalf of Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy
10 Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy
11 Missouri West”) (collectively, the “Company” or “Evergy”).

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

13 A: The purpose of my rebuttal testimony is to respond to portions of the Direct Testimony of
14 Office of the Public Counsel (“OPC”) witnesses Lisa Kremer, Dr. Geoff Marke and Angela
15 Schaben, and Missouri Public Service Commission Staff (“Staff”) witnesses Claire
16 Eubanks and Scott J. Glasgow. Ms. Kremer requests the development of a simulated
17 customer account and login to allow OPC real-time use to view customer information,
18 messaging, etc. Dr. Marke raises concerns related to the Company activities related to
19 Advanced Metering Infrastructure (“AMI”) meters, the company’s Customer Information

1 System (“CIS”), late fees, income-eligible programs, Clean Charge Network issues and
2 time-of-use (“TOU”) rates. Ms. Eubanks raises concerns regarding the Company’s
3 activities related to AMI meters. Mr. Glasgow discusses Evergy’s deployment of
4 technology to reduce Operational and Maintenance (“O&M”) costs and the Company’s
5 implementation of a universal customer service across all rate jurisdictions. Ms. Schaben
6 also recommends the disallowance of the costs of the Uplight Program. I will address their
7 direct testimony below.

8 II. CUSTOMER ACCOUNT ACCESS

9 **Q: Please describe your understanding of the OPC’s request to have a login to Evergy’s**
10 **MyAccount customer portal.**

11 A: As Ms. Kremer indicates in her testimony, earlier this year a request was made to the
12 Evergy team to create a simulated customer account and login to allow OPC real-time
13 access to view customer information, messaging, etc. It was discussed at the time of that
14 meeting that there would likely be difficulty in accomplishing the specific ask, but that the
15 Evergy team would investigate the feasibility, cost and implications, and get back to the
16 group.

17 **Q: What did the internal research uncover?**

18 A: Evergy has had technical IT and systems administration teams as well as the business
19 owners of Evergy’s digital customer experience team research possible avenues to meet
20 Ms. Kremer’s request. However, based upon multiple internal discussions, it is clear that
21 there is no cost-effective or operationally feasible way to create simulated accounts while
22 maintaining the integrity of our customer billing systems and portals.

1 **Q: What are some of the reasons why this is not a reasonable request for Evergy?**

2 A: First, it is not practical, cost-effective or acceptable from a business risk and financial
3 reporting perspective to create a simulated account with manufactured customers and
4 customer data including meters, usage, payments, etc. within our production billing system.
5 It is not a proper business practice to create a simulated account within a platform actively
6 used by the business for customer interactions, billing and financial reporting purposes. It
7 could easily create havoc with our reporting and accounting processes.

8 Further, our investigation revealed that this is a highly unusual request. We are not
9 aware of anywhere in the U.S. where a regulatory stakeholder has requested and been
10 granted access to a utility's customer-facing portals. Even if it could be done in our
11 systems, the creation and management of those simulated accounts would pose significant
12 cost to create and become a manual burden to the company (as there would be no natural
13 flow of data for simulated customers, meters, accounts, etc.). The cost would be
14 significantly greater than any potential benefit articulated by such access and review
15 articulated by OPC in its testimony.

16 In addition, nowhere in the resumes of OPC witnesses do they offer a witness or
17 testimony with experience or expertise in designing, evaluating, testing or implementing
18 authenticated customer portals. Nor are any OPC witnesses certified as an expert or list
19 education or experience in digital user experience design, implementation or testing. As
20 such, even if it was practical to construct a simulated account, OPC is only proposing to
21 offer a lay opinion with respect to customer experience and design of Evergy's customer
22 portals.

1 Finally, OPC’s original request to the Company was centered around a singular
2 login to review general customer experience for payments, payment arrangements,
3 customer messaging, billing analytics, etc. Ms. Kremer’s request now is for specific details
4 that would not all be available with a singular customer, i.e., TOU rates, payment
5 arrangements, different rates, all combinations of bill messages, fees, etc. Different
6 customers in different jurisdictions have different rates, different electrical service
7 requirements, are enrolled in different programs and product offerings. It would be
8 difficult, if not impossible to replicate all of the possible journey paths and permutations
9 of service in a simulated, single account as requested by OPC. All of the different scenarios
10 would not occur on a single account and would be extremely difficult to collect in a fashion
11 that is convenient or valuable to third parties such as OPC and Staff.

12 **Q: What alternative could be offered to satisfy the OPC request for simulated login to**
13 **the customer portals?**

14 A: Evergy understands the desire for OPC and Staff to have a good understanding of the
15 customer experience on the web portals. In fact, Evergy has previously provided
16 demonstrations of its Energy Analyzer and TOU digital tools with OPC. Evergy has
17 previously offered to provide a scheduled demonstration of our customer portals to allow
18 insight to different customer interactions and options on the web. It would still be a
19 challenge to accommodate every different scenario that could possibly exist in our system,
20 but with advanced notice of the critical items, Evergy could produce a thorough demo of
21 the portals with actual customer data.

1 **III. AMI METERS**

2 **Q: Does OPC witness Dr. Geoff Marke question the benefits of Evergy’s AMI meters?**

3 A: Yes. Dr. Marke claims that the primary benefit of AMI meters is through offering TOU
4 rates, with a secondary benefit being more finite energy usage (15-minute intervals), which
5 can be useful if a customer is considering rooftop solar as a possible large capital
6 investment.

7 **Q: Do you agree with Dr. Marke’s characterization?**

8 A: No. Dr. Marke has seriously underestimated the benefits to Evergy’s customers related to
9 the deployment of AMI meters. Company witness Brad Lutz provided extensive Direct
10 testimony not addressed by Dr. Marke outlining numerous benefits unlocked by the AMI
11 technology that the Company is currently utilizing and planning to rollout through
12 additional use cases over time.

13 While I agree that employing pricing to customers (such as TOU) is a benefit of
14 AMI meters, I do not agree with Dr. Marke that it is a “primary benefit.” I also do not
15 agree that the ability to receive finite energy usage data is a critical factor for a customer
16 considering solar.

17 The availability of interval meter data does not increase solar adoption in isolation
18 and likely is not a factor at all. Dr. Marke fails to understand that customers do not first
19 prioritize interval data as a key decision point on whether or not to install solar. There are
20 numerous much more significant factors that customers consider that have a material
21 impact on whether to invest in and install solar. Those factors include, but are not limited
22 to: the price of electricity; the overall cost of the solar installation, coupled with available
23 financing and lease options; utility tariffs valuing excess solar generation and how it

1 impacts the period over which the initial investment will be paid back; the availability of
2 state authorized solar rebates and their per watt amount; the availability and level of federal
3 tax credits; the value and ability to access the market for renewable energy credits (“REC”);
4 a customer’s attitude towards climate change and renewable generation; homeowner
5 association rules and local ordinances regarding solar installations, availability of solar
6 installers; the age and pitch of the customer’s roof; the direction a customer’s house and
7 roof are facing; and, the estimated annual and lifetime maintenance costs for the solar
8 installation. Evergy works with nearly every solar installer and engineering company
9 within our service territory, as well as multiple national solar companies. The availability
10 of meter data, as described by Dr. Marke, is not even in the top ten considerations for a
11 customer determining whether or not to pursue solar generation on their home. In fact,
12 customers were installing solar long before the availability of AMI data.

13 The Britannica dictionary defines confirmation bias as, “the tendency to process
14 information by looking for, or interpreting, information that is consistent with one’s
15 existing beliefs. This biased approach to decision making...often results in ignoring
16 inconsistent information.” Dr. Marke’s conclusion suffers from confirmation bias. When
17 posed the question, “what benefits have customers received to date from the hundreds of
18 millions of dollars invested in the Company’s AMI and CIS systems,” Dr. Marke answers,
19 “none that I can see.” This statement by Dr. Marke is unfounded and demonstrates the
20 length at which he has to stretch to make a point.

21 **Q: Was there Direct testimony filed with regards to the deployment of AMI meters?**

22 **A:** Yes. Both OPC witness Marke and Staff witness Eubanks provide testimony regarding the
23 AMI deployment schedule, along with a generalized concern raised related to AMI meters

1 already installed which are being replaced with AMI-SD meters (i.e., service disconnect
2 capable meter).

3 **Q: In describing the deployment schedule for AMI meters, do you agree with Dr.**
4 **Marke’s characterization that the Company had an “erratic pace of deployment” that**
5 **was “both confusing and apparently at odds with what KCPL/GMO were publicly**
6 **saying back in 2016”?**

7 A: No. As was pointed out in Direct testimony of Company witness Lutz, the pause of meter
8 exchanges in 2017 and 2018 was designed to not interfere with the data conversion and
9 implementation of the One CIS project. This was not “erratic”, but rather an intentional
10 plan to avoid issues or perceived concerns of new meters around the same time as a new
11 billing system was being implemented. In addition, Evergy regularly had meetings with
12 Staff, OPC and other regulatory stakeholders throughout the time period the new CIS was
13 being implemented. In many of those meetings, the impacts to meter deployment were
14 discussed—clearly stating that there would be time periods during which meter installation
15 would be paused to accommodate the CIS project.

16 This is a perfect example of the confirmation bias that permeates nearly all of Dr.
17 Marke’s testimony. His thesis, laid out in the very beginning of his testimony, is that
18 Evergy customers have not fared well since 2018. Then he views every piece of Evergy
19 testimony, every data request response and every fact through the prism of his thesis—
20 even when the record is full of testimony demonstrating the opposite and supported by fact.
21 His testimony is replete with examples, of which this is one, where he sees a fact and
22 immediately views it in a manner that supports his overarching and negative thesis with
23 respect to Evergy and the way we endeavor to serve our customers.

1 In this case, without any support or analysis, Dr. Marke takes the existence of time
2 periods where meter exchanges ceased for a period of time and summarily labels the meter
3 deployment as having an “erratic pace” and uses this conclusory and unsupported label to
4 support his perspective that the meters are unneeded and the deployment was erratic.
5 However, the cessation of meter exchanges during the implementation of a new billing
6 system and many other customer-facing interfaces that use meter and billing data is
7 appropriate. Not only is it best practice, but frequently it is required in order to complete
8 integration with existing systems and to implement new software system(s). Dr. Marke
9 could not see this because of his confirmation bias—everything he observes is confirmation
10 that his extremely negative impression of Evergy is true and used to support that
11 conclusion. In addition, Dr. Marke is not an expert in meter technology and meter
12 deployment. Nowhere in the record does he list any credentialing, studies or practical
13 experience in this area. He is not an expert when it comes to meters and meter deployment.
14 If he was, he would have known that it is best practice to alter the timing and schedule of
15 deployment around major billing, metering and data software changes for a number of
16 practical and technical reasons. Conversely, the Evergy employees who formulated the
17 plan to exchange non-Service Disconnect (“SD”) meters with meters that have the remote
18 disconnect and reconnect capability have decades of individual and combined experience,
19 both with meters and with successful meter exchange programs. They are engineers with
20 specific education in this technology.

21 In actuality, Evergy’s program to exchange non-SD AMI meters for updated meters
22 with the ability to remotely disconnect and reconnect service, as well as multiple other
23 technological upgrades, was well conceived and well executed:

- 1 ▪ Witnesses, workpapers, financial analysis and data request responses all show that
- 2 this meter exchange plan cost customers less than if Evergy had implemented AMI
- 3 meters with SD capability back in 2014.
- 4 ▪ The plan was supported by a business case that conservatively lays out hard costs
- 5 savings that provide customer cost benefits equal to the cost of deployment.
- 6 ▪ The meter deployment plan was well constructed and able to adjust for emergent
- 7 events, such as the implementation of multiple customer-facing software updates
- 8 and the effects of the Covid-19 pandemic.

9 **Q: What specific concerns were raised with regards to the AMI-SD meter deployment?**

10 A: Both Staff witness Eubanks and OPC witness Marke express concerns that AMI meters

11 installed without SD capability in the 2014 to 2016 timeframe, are now already being

12 replaced by AMI-SD meters prior to the end of their design life. Staff witness Eubanks

13 recommends a disallowance of \$3,641,734 and \$1,973,398 from EMM and EMW’s FERC

14 account 370.2, respectively, based on retirements that occurred during the test year and

15 update period. She states Staff will incorporate the level of disallowance associated with

16 “premature” retirement that occurred before the test year as soon as the information to

17 calculate such adjustments is provided by Evergy. OPC witness Marke recommends that

18 the Commission disallow costs related to any second-generation AMI meters and

19 associated installation costs.

20 **Q: Do you agree that the recommended disallowances are warranted?**

21 A: No. While it is factual that the AMI meters, without SD capability, Evergy deployed from

22 2014-2016 still had design life left, they were not prematurely retired. As detailed later in

23 my Rebuttal testimony, a rigorous business case was conducted and the financial impact to

1 customers was analyzed from two different perspectives. The business case clearly showed
2 significant operational cost savings and upgrades in customer experience that justified the
3 exchange. The financial analyses indicated that customers benefitted from the exchange.
4 Finally, the notion that the non-SD meters were retired prematurely fails to account for the
5 fact that the meters were replaced for technology reasons. Earlier analog meters did not
6 materially change for decades and had much longer useful lives. Now, metering
7 technology and other transmission and distribution technology have useful lives that are
8 often more dependent on the technology installed in them than the actual hardware in which
9 that technology is housed. Company witness Larry Kennedy talks about technology
10 change and plant retirements in both his Direct and Rebuttal testimonies.

11 The Company based its decisions on which meter types to deploy and when to
12 deploy them based on business cases developed at the time, both for the initial deployment
13 of non-AMI SD meters as well as the subsequent decision to install AMI-SD meters. These
14 are prudent investment decisions that benefit customers.

15 **Q: Why did Evergy not include AMI-SD meters in its initial deployment during the 2014-**
16 **2016 timeframe?**

17 **A:** Company witness Brad Lutz provides detailed background in his Direct testimony behind
18 the business drivers for this initial AMI investment. At the time of the initial deployment,
19 AMI-SD meters were cost prohibitive, more than double the cost of the meters that were
20 installed and nearly 25% higher than prices available today for AMI-SD meters. The
21 business case could not support SD meter deployment due to the price of the meters as
22 noted above, and the fact that Legacy KCP&L Metro was replacing an AMR system and
23 not manual meter readers. In addition, the internal temperature sensor in the SD meters

1 was a new technology not yet fully understood by Evergy as to the value it could bring to
2 customers.

3 **Q: When did Evergy decide to start implementing AMI-SD meters as part of its initial**
4 **deployment?**

5 A: In 2017, Evergy committed to the third phase of the AMI rollout to be SD meters where
6 applicable. The rural AMI expansion that began in 2019 completed the Evergy rollout of
7 AMI meters (approximately 165,000 in Missouri) and included the SD capabilities to all
8 customers capable of using an AMI-SD meter. At that same time, any meter that needed to
9 be exchanged due to meter issues was exchanged with an SD meter.

10 **Q: What were the drivers for Evergy's decision to start installing AMI meters with SD**
11 **deployment?**

12 A: There are multiple reasons for the decision to deploy SD meters. First, at that time, the
13 standard AMI meter Evergy previously used in the field was no longer going to be
14 manufactured a decision had to be made on what replacement meters would be used going
15 forward. Replacing the existing AMI meters with meters capable of remote disconnect and
16 reconnect capability results in a material cost reduction of nearly 25% from 2014, coupled
17 with significant additional functionality and use cases (all of which were detailed in the
18 business case and provided to stakeholders). Not only is there a cost reduction component
19 by reducing the number of truck rolls, there is also a significant improvement in the
20 customer experience. By using the SD capability, customers can get service connected
21 nearly 24 hours a day, seven days a week. Particularly, customers who have had their
22 power shut off for non-payment find that their power is on within minutes of making the
23 payment to restore service. In addition, the SD meters also provide internal temperature

1 sensing to enhance customer safety by detecting meter socket issues such as loose meter
2 clips and overload conditions. The SD meter also has enhanced outage notifications upon
3 loss of power over the AL meters enabling Evergy to respond to outages more efficiently.
4 The Focus AX-SD meters have the capability to bring back interval voltage data and can
5 be utilized for future system upgrades and capacity planning. This data can also be used
6 in troubleshooting for phase outs, voltage issues, and for storm restoration to find nested
7 outages and improve response times. This also aids in customer driven power quality
8 complaints for high and low voltage issues that are intermittent and provides more than a
9 snapshot in time when the technician is at the premise.

10 **Q: Are there other benefits from the new SD enabled AMI meters and CIS improvements**
11 **that Dr. Marke missed or did not recognize in his testimony?**

12 **A:** Yes, there are many. The new meters not only came with remote disconnect and reconnect
13 capabilities, but a host of other technological advances that coupled with our new CIS
14 system provide a host of customer benefits. Some of those benefits are being realized today
15 and others are planned for the future. All of them were described and quantified in the
16 business plan constructed to analyze this AMI decision, have been discussed in Brad Lutz's
17 Direct testimony and have been summarized at a high-level in the table below.

AMI Benefits	CURRENT STATE	FUTURE STATE
Remote Meter Reading Capabilities Provides Data & Additional Data Opportunities	✓	
Reduces Labor for Manual Meter Reading Activities	✓	
Reduces Safety Risks for Employees Conducting Manual Reading Activities – Hostile Customers or Dogs	✓	
Remote Meters Create Smaller Percentage of Estimated Bills	✓	
Increases Customer Satisfaction and Reduces Customers Wait Times with Automated Turn-On/Reconnect/Disconnect	✓	
Automates Debt Collection Disconnection – Reduces Truck Rolls for Collection Orders	✓	
Temperature Alarms Reduce Potential for Meter Socket Fires	✓	
Supports Outage Notifications with Estimated Restoration Times and Restoration Alerts for Customers Electing this Feature	✓	
Proactive Notices & Alerts Reduce Contact Center Call Volumes	✓	
Voltage Load Profile Data Promotes Better Energy Delivery Options	✓	
Increases Safety with Visibility of Line & Load Side Voltage	✓	
Sag/Swell Alarms Support Systems Operations with Delivering Energy to Customers	✓	
Over the Air Programming for Automated Meter Changes for Alarms or Rate Changes	✓	
Analytics for Revenue Protection, Condition-Based Meter Maintenance, and Distribution Operation Insights	✓	
Enables Offerings for New Pricing Options for Customers – Time of Use Rates & Real Time Pricing	✓	
Supports Load Research & Forecasting	✓	
MEEIA Programs	✓	
Allows Customers to Download Usage to Perform Their Own Analysis	✓	
Provides Current State & Predictive State of Distribution Transformers		✓
Promotes Validation of GIS Connectivity Models		✓
EV Detection Promotes Understanding of Impact of EV on System and Supports Creating New Rate Options		✓
Increases Accuracy for Phase Mappings in GIS Systems		✓
Identifies Overloaded Transformers		✓
Supports Prepay and/or Pay-As-You-Go Options		✓
Home Energy Calculator Assists Customers with Evaluating Private Solar Options Insights		✓
Usage Alert Tools Provide Customers with Opportunity to Monitor and Minimize Bill Impacts	✓	

1 **Q: When did Evergy begin its effort to replace the AMI meters without SD capability**
2 **initially deployed during 2014-2016 with new AMI-SD meters?**

3 A: The decision was made in 2019 to start the replacement project in 2021. However due to
4 workforce availability during the Company's COVID-19 voluntary moratorium on
5 disconnection for non-pay, exchanges started in 2020. For any meter population
6 jurisdiction, approximately 92% of services can accept SD technology, the other 8% are
7 typically large services that require current transformer ("CT") metering or may be of
8 essential service where remote disconnect/reconnect SD technology would not be
9 deployed. The current deployment plan is to exchange FOCUS AL to the FOCUS AX-SD
10 Meters based on the schedule below, reaching approximately 92% of Evergy meters with
11 SD technology by the end of 2024.

12 The initial timeline for SD AMI meter change outs previously shared in DR
13 responses is as follows and inclusive of Kansas meters:

14 2021: 150,000 meters
15 2022: 90,000 meters
16 2023: 90,000 meters
17 2024: 90,000 meters
18 2025: 90,000 meters
19 Total: 510,000 meters

20 The following schedule was updated based on the reasons discussed above and actuals and
21 new forecasts are as follows for Evergy Missouri Metro and Evergy Missouri West only:

	Missouri Metro	Missouri West	Total
2020*	14,000	2,400	16,400
2021*	30,000	18,000	48,000
2022	40,000		40,000
2023	45,000	25,000	70,000
2024	45,000	40,000	85,000
2025		85,000	85,000
Total	174,000	150,000	324,000

* Estimated Actual replacements

1 **Q: How does Evergy support that it is just and reasonable to change out functioning AMI**
2 **meters to a new AMI-SD prior to the end of their design life?**

3 A: Evergy conducted two financial reviews to validate that the AMI meter changeout to AMI-
4 SD meters were at minimum cost neutral to customers. The first financial review evaluated
5 the cost to purchase and install AMI-SD meters based on the changeout schedule
6 previously described and the short-term and on-going O&M savings that would be realized
7 due to the additional capabilities the AMI-SD meters could provide to make operations
8 more efficient. The results indicate that from a financial perspective, customers would be
9 indifferent to the AMI-SD meter change.

10 The second financial review calculated the present value of the AMI meters
11 installed in 2014 at \$76 per meter plus the cost to install an AMI-SD meter in 2021 at \$125
12 per meter. This was then compared to the cost of an AMI-SD meter in 2014 at \$165 per
13 meter. The present value comparison indicated that installing the AMI meter without SD
14 capabilities in 2014 plus installing an AMI-SD meter in 2021 was less expensive than if

1 the Company would have installed AMI-SD meters in 2014. For more details on the
2 business case and financial review, please refer to DR 0295 in case ER-2022-0130.

3 **Q: How is Evergy going about implementing this AMI changeout to AMI-SD meters?**

4 A: After the rollout of approximately 165,000 SD meters in the rural areas, Evergy built a
5 plan to replace the standard AMI meters with an SD capable meter. In terms of prioritizing
6 the general order and timing for the changeout of meters, Evergy prioritized exchanging
7 meters that created the most benefit to the customer and the Company. Evergy assessed
8 the service order volume requiring a physical truck roll. The service orders that drive the
9 highest volume of truck rolls are Turn On, Turn Off, Succession/Back-to-Back/Move-In
10 and Move-out, Non-Pay Turn Off, and restore after payment. In order to deploy this
11 technology to gain the most efficient and significant reduction in service order volume that
12 require truck rolls, Evergy focused efforts on multi-tenant locations along with customers
13 who were in arrears. Multi-tenant and customer arrears are two known data points that
14 allow us to ensure that the technology is deployed in the most effective manner related to
15 service orders that require a truck roll. While a truck roll was not saved on the collection
16 order, the customer experience for those customers whose power was disconnected for
17 non-pay was improved and a truck roll was saved on the reconnect.

18 **Q: Are there any other reasons why Evergy deployed the SD meters at multi-tenant**
19 **locations?**

20 A: Yes. Multi-tenant locations are facilities that have a high number of service orders. For
21 example, high volumes of service orders are driven by “college rush”, where we have
22 numerous customers moving in or out of these locations at the start or end of the school
23 year. We also knew that during COVID, we were faced with a moratorium on debt

1 collection activities and at some point, we would be collecting again. Debt collection
2 activities can also be situations where both the customer and employee are at risk due to
3 the potential for altercation and SD meters can reduce that risk. To minimize these
4 customer impacts, we used that information to help us deploy this meter technology to our
5 customers in those situations. The thought was that should those customers face
6 disconnection, they would be turned on in a more efficient fashion on the reconnect. In
7 addition, the technology deployed in this manner minimizes the impacts to other customers
8 without the technology, in that it reduces truck rolls for those customers in the high-volume
9 work categories, which means more efficient and available resources to serve all other
10 customers.

11 **Q: Have you found other ways to be more efficient?**

12 A: Yes. For any service order that requires a truck roll and can accept a meter with SD
13 technology, our employees have a standing order to complete the exchange at that time.
14 Since we are already at the customer's location, it makes sense to install the SD meter and
15 possibly eliminate future truck rolls based on the order types described above. Our desire
16 is to install SD technology in all applications where the service configuration can accept
17 the technology. Even though all meters will eventually be exchanged, we want to be as
18 efficient as possible while doing that work with truck roll reduction as the key driver.

1 **Q: Both Ms. Eubanks and Dr. Marke express concern that the Company has been**
2 **systematically replacing meters on houses of customers in arrears. Dr. Marke even**
3 **goes so far to allege that prioritizing customers in arrears is the equivalent of**
4 **redlining and that this information about meter exchanges only came to light during**
5 **the discovery process. How do you respond?**

6 A: Of the many utterly unsubstantiated and outrageous claims Dr. Marke makes in his Direct
7 testimony, characterizing prioritizing customers with balance in arrears as the equivalent
8 of redlining is the most ridiculous and unprofessional testimony I have come across in
9 nearly twenty years in the utility industry. It is gross in its exaggeration and careless in its
10 implication.

11 Perhaps Dr. Marke could benefit from learning about the definition and history of
12 redlining. Merriam Webster's dictionary defines redlining as, "the illegal practice of
13 refusing to offer credit or insurance in a particular community on a discriminatory basis (as
14 because of the race or ethnicity of its residents)." There is nothing remotely illegal about
15 Evergy's prioritizing customers with balances in arrears to receive SD capable meters. In
16 fact, as detailed later in this testimony, at the time Evergy undertook its plan to prioritize
17 installation of SD capable meters with customers facing disconnection for large balances
18 in arrears, Evergy had referenced this plan in testimony before the commission regarding
19 pandemic payment plans and had discussed the plan with both Staff and OPC in at least
20 one meeting regarding pandemic payment plans and relief. Prioritizing customers with
21 balances in arrears is intended to **IMPROVE** their customer experience coming out of the
22 pandemic disconnection moratorium, not target them in some negative fashion. Evergy
23 knew that once the disconnection moratoriums were finished, an atypically high number

1 of customers would have balances in arrears. Despite raising disconnection thresholds and
2 having new and enhanced payment plans, Evergy was concerned that if a high number of
3 customers were disconnected, many of them could end up waiting hours for reconnection
4 once a payment was made or a plan established. As a result, we prioritized those customers
5 with balances in arrears to ensure that they could be immediately restored to service once
6 a plan was established and a payment made. This is a benefit, NOT discriminatory in a
7 negative way, and therefore nothing like redlining as Dr. Marke states.

8 Nothing changed in Evergy's account management and disconnection procedures
9 as a result of installing meters capable of remote disconnection and reconnection. Evergy
10 still complies with every aspect of Chapter 13 rules. Evergy still conducts an in person
11 visit to knock and collect. The only change any customer with arrears would have seen as
12 a result of these meter exchanges, was service reconnection took only minutes rather than
13 hours.

14 Levying a claim that a company is inappropriately discriminatory is a very serious
15 allegation and should not be made without irrefutable proof. Dr. Marke's testimony is
16 exactly the opposite and is defamatory not just to Evergy, but to the men and women who
17 made the decisions to prioritize these customers for the customers' benefit during the
18 pandemic.

19 Our intent is to move to all SD meters regardless of location or account status. The
20 Company believes that the Commission would expect us to deploy technology in the most
21 efficient fashion and to the benefit of all customers.

1 **Q: Is it surprising to you that both OPC and Staff were seemingly caught off guard by**
2 **Evergy's plan to replace meters with SD technology?**

3 A: Yes. Our plans to strategically replace meters with the SD capable meters to drive customer
4 satisfaction and reduce costs have been previously explained to stakeholders and
5 documented in another docket. In my testimony in September 2020 in File No. EU-2020-
6 0350, our intent to exchange meters of customers at risk for disconnection for non-pay to
7 expedite the reconnection process and reduce the impact for those customers was
8 communicated to all parties. The excerpt from my Surrebuttal Testimony in that docket
9 stated:

10 **Q: What steps did Evergy take in response to this growth in customer arrears?**

11 A: Evergy took immediate steps on a variety of fronts to mitigate the impacts of the COVID-
12 19 pandemic. For example, we aggressively and proactively communicated with
13 customers, elected officials and community stakeholders during this time. This has
14 included ongoing weekly meetings with state regulatory staffs and stakeholders as
15 described by OPC witness Dr. Marke. We were one of the first U.S. utilities to announce a
16 voluntary moratorium on disconnection of service to residential and small business
17 customers for non-payment as well as waive late payment fees. We targeted and expedited
18 the hiring and training of two classes of customer service representative to assist the
19 expected growth in customer contact center activity. We targeted and expedited AMI
20 automatic disconnect/reconnect meter swaps for customers with past due balances in
21 Evergy Metro and Evergy Missouri West. As the Commission is aware, we have not yet
22 sought authority to utilize the AMI meters to disconnect customers. The benefit of these
23 swaps at this time was that in the event we followed our traditional disconnect policy for

1 customers we can now utilize the AMI meters for reconnection without rolling a truck
2 which expedites customer reconnection after payment as we do not need to schedule a truck
3 roll to reconnect. It also helps to mitigate the cost associated with reconnecting customers.
4 It is win-win. Customers who make pay arrangements are reconnected much quicker,
5 especially given the volume of disconnections and payment arrangements we anticipated
6 coming out of the moratorium. And, it also reduces the cost of reconnecting customers.

7 In addition, during the regular quarterly meeting of our Customer Operations
8 leadership and Staff on November 2, 2021, the topic of SD technology and on-going rollout
9 was discussed. It is entirely inappropriate for OPC or Staff to suggest any shock or
10 nefarious intent.

11 **Q: Do you have any other comments regarding the proposed disallowance?**

12 A: Yes. Staff witness Eubanks includes AMI meter exchanges that were categorized as
13 “unknown” in her proposed disallowance. This includes \$157,170 for Evergy Missouri
14 Metro and \$281,124 for Evergy Missouri West. The “unknown” meter exchange category
15 comes from two different places - people entering an order without any comments, or, more
16 commonly, our field personnel making the decision to exchange the meter while at a
17 customer location for a different reason. For the field employees, it’s a “pick-up” order in
18 PCAD and there is no way to enter a reason why we exchanged it. The reasons for these
19 type of pick-up orders include such things as damage to the meter, a blank screen, damage
20 due to meter can issues (loose clips), and a painted over meter. When we enter orders for
21 proactive AL to AX-SD meters the system always puts a reason in, so they would not fall
22 in this category.

1 **Q: OPC witness Marke expresses concern that the Company did not perform an RFP**
2 **for deploying the second generation meters. What is your response to that concern?**

3 A: Evergy did not conduct an RFP for the deployment of second generation meters because
4 we leveraged an existing relationship with Anixter/Wesco. The existing network and AMI
5 system supports the SD meters, so changing AMI vendors for this project would have
6 required all new network and a complete change out of all meters in Evergy Missouri
7 Metro and Evergy Missouri West, as well of creating new IT interfaces into our internal
8 systems such as meter data management (“MDM”) and Customer Care & Billing
9 (“CC&B”). The SD meters that we are currently installing have been installed in Metro
10 since 2011, in certain applications, and have a proven track record and so the technology
11 is proven. In addition, the contract with L+G is thru 2034, so to change AMI vendors
12 would have been a contract breach and created a termination penalty with the vendor.
13 Termination penalties are common throughout the electric utility industry in contracts of
14 this nature.

15 **Q: Do you have any concluding remarks regarding AMI meters?**

16 A: Yes. The Company has embarked on a thoughtful and prudent approach to deploy AMI
17 technology over time to our customers. AMI meters have already unlocked many benefits
18 that our customers are enjoying today. The decision to also change out non-AMI-SD
19 meters with AMI-SD meters was based on a solid business case - both in the initial decision
20 to not deploy the technology when price differences were significantly higher than they are
21 today, as well as the decision to later change out non-AMI-SD meters prior to the end of
22 their design life for AMI-SD meters that bring additional cost savings and other benefits to
23 customers.

1 If the Commission were to disallow recovery of the AMI-SD meters, it would
2 essentially be telling Evergy to stop deployment. Ceasing deployment of AMI-SD meters
3 would increase the Company's cost of service higher than it would otherwise be by
4 eliminating the cost savings unlocked by AMI-SD meters. In addition, it would eliminate
5 the benefits of SD technology for customers. Characterizing the replacement of non-SD
6 AMI meters deployed in 2014 as imprudent ignores the technology advancements, the cost
7 savings and the business case conducted that clearly supports the exchange. It is a red
8 herring that runs counterfactual to the evidence in this case. The Commission should reject
9 the disallowances recommended by Staff and OPC.

10 **IV. CUSTOMER IMPROVEMENTS AND UNIVERSAL CUSTOMER SERVICE**

11 **Q: Mr. Glasgow raised concerns about Evergy customer improvements and movement**
12 **toward universal customer service across all rate jurisdictions. Do you have any**
13 **response to his testimony?**

14 **A:** Yes. As noted in this case and in my previous testimony, significant investments have been
15 made in critical customer systems. This includes foundational systems such as our CIS
16 and telephony infrastructure, and customer facing technologies such as our IVA and online
17 portals. The benefits from these upgrades are many. Not only do they offer customers
18 more ways to interact with Evergy, but the system upgrades allow customers to transact in
19 the way that best works for them and their particular issue. Now that foundational
20 technology is in place and long-term risks of aging technology have been mitigated, Evergy
21 can turn to identifying incremental improvements to customer experience and incremental
22 cost efficiencies. Evergy will use feedback from our Voice of Customer surveys, as well

1 as other feedback from customers from other research and our daily interactions with
2 customers to drive process improvements and enhanced customer experience.

3 **Q: How do these system enhancements relate to cost savings within the contact center?**

4 A: Like most regulated utilities, a Company goal over the last 15 years is to improve and
5 increase the use of automation and customer self-service channels. Doing so will help us
6 meet customer expectations, and also find cost savings for our customers. Each customer's
7 needs and expectations are different. It is important for customers to have choice in how
8 they choose to transact with Evergy. While there will always be a need for someone to be
9 available for customers to speak with, as technology continues to be deployed and call
10 volumes decrease and more transactions happen through other self-service channels, the
11 Company can appropriately reduce staff and pass those savings along to customers.

12 **Q: How does Evergy plan to implement universal customer service within the contact
13 centers?**

14 A: It is no secret that Evergy believes our customers will be served most efficiently and
15 effectively by having all our representatives capable of assisting all customers. This is the
16 model Evergy Missouri Metro and Evergy Missouri West used prior to the merger and
17 continues to use today (Kansas and Missouri calls are both handled in the same contact
18 center). Customer Service Representatives ("CSRs") are thoroughly trained on the
19 differences between jurisdictions and have the tools to ensure callers are served based on
20 the state or jurisdiction that applies to them.

21 As for Mr. Glasgow's concern around Evergy's compliance with the AllConnect
22 agreement, CSRs are already trained and have only been transferring Kansas customers to
23 AllConnect as a matter of practice. Evergy's Raytown call center serves Evergy Kansas

1 Metro customers today. As a result, Raytown is already able to handle the different
2 requirements around AllConnect efficiently and effectively. Future planned technology
3 upgrades will only further streamline this process. Therefore, expanding the use of
4 universal customer service agents is not currently and will not in the future impact
5 compliance to the Commission's Report and Order in File No. EC-2015-0309. Further,
6 universal customer service will lead to incremental cost savings that will provide benefits
7 to customers for years to come.

8 With respect to implementation, Evergy does not have a set timeline for the move
9 to 100% universal customer service. The technology is in place and next steps will be
10 around the people and processes. The contact center leadership will continue to keep Staff
11 informed via the regular quarterly updates and other communication outside of those
12 windows if needed.

13 **Q: In this testimony, Dr. Marke states the Company's CIS system has proven to be**
14 **notoriously unreliable with prolonged shut-downs at least twice since the last rate**
15 **case." Do you agree with this statement?**

16 **A:** No. Evergy's CIS is very reliable. The unplanned downtime for the system is minimal
17 reflecting over 99.9% availability. The availability is defined by the minutes of unplanned
18 CIS technology issues including network issues that may have prevented users from
19 accessing systems that were not technically "down." The shutdowns described by Dr.
20 Marke are over exaggerated and not as described. The first alleged shutdown was related
21 to customer complaints and the change.org petition in 2018. While customers were
22 unhappy with high summer bills during a record hot Spring, the systems were functioning
23 properly and were not "down." The concerns around budget billing were not related to

1 system malfunction or downtime, but related to record heat in a shoulder month that created
2 the recalculation of many budget billing amounts. Processes were changed to allow for
3 customer assistance and a month reprieve from disconnects, this was not a malfunction of
4 the system, but a customer friendly response to unexpected circumstances.

5 The second shutdown mentioned in January 2021 was a planned system outage to
6 implement the Customer Forward project which included bringing the former Westar
7 customers into the Evergy billing system as well as new functionality for all Missouri
8 customers. As noted in DR 0460 Case ER-2022-0129, the planned outage aligned with
9 industry standards for implementations on customer information systems. The Customer
10 Forward Program required a planned system outage for the final cutover-to-production
11 activities through go-live. The planned outage was from January 13, 2021 to January 18,
12 2021. The noted five-day outage is much less than the “into the Spring Season of 2021”
13 claim from Dr. Marke. As part of that implementation effort, Evergy wanted to ensure
14 that all systems were functioning properly, and customers would not experience any
15 adverse effects. This included allowing all customers to bill at least once on the new system
16 before any collection efforts were introduced. The collections and severance process itself
17 takes some time to complete. The collections process was resumed on April 7, 2021 and
18 the associated disconnections occurred on May 3, 2021. Evergy was also mindful of the
19 time of year and the ongoing pandemic. From a residential customer perspective, there
20 would have also been limited disconnect opportunities based on the Cold Weather Rule
21 restrictions in January, February, and March.

1 **V. J.D. POWER CUSTOMER SATISFACTION SCORES**

2 **Q: Dr. Marke testifies that Evergy’s JD Power scores have been on a “downward trend”**
3 **since 2018. Is he correct?**

4 A: No. Evergy’s overall JD Power scores have steadily increased since the merger closed in
5 June 2018. In late 2021 and in 2022, the Company’s scores saw significant gains. In 2018,
6 Evergy’s full-year JD Power overall score was 707. Evergy’s full-year JD Power score in
7 2021 was 741, and year-to-date 2022 the Company’s score is an all-time high at 746.

8 **Q: Dr. Marke references rankings instead of scores. How do Evergy’s scores translate to**
9 **the peer rankings?**

10 A: Evergy is included in JD Power’s Midwest Large peer group, which is comprised of the 15
11 largest utilities in the Midwest Region. Evergy’s ranking has also consistently improved
12 since 2018. In 2018 and 2019, Evergy was ranked 15 out of 15 utilities. In 2020, Evergy’s
13 ranking improved to 13 out of 15. In 2021, Evergy’s ranking improved to 12 out of 15.
14 Year-to-date 2022, Evergy’s ranking has improved to 6 out of 15. Overall, while Evergy’s
15 rank had hovered in the fourth quartile for several years, the recent more significant
16 improvement and decline of the Midwest Large peer group scores have resulted in our
17 ranking moving into the third quartile for 2021 and the first quartile for year-to-date 2022.

18 **Q: What do you believe is contributing to this upward trend in overall score and**
19 **ranking?**

20 A: JD Power scores are comprised of six driver categories: Power Quality & Reliability, Price,
21 Billing & Payment, Corporate Citizenship, Communications, and Customer Care. Evergy’s
22 scores in all six categories have shown similar improvements over the same time frame

1 (2018 to present). There are multiple reasons for the improvement, but major contributors
2 to this upward trend include, but are not limited to:

- 3 ▪ Successful implementation of new customer systems that have now been in place
4 for more than a year and a half and are well-received by customers.
- 5 ▪ Additional online tools heavily used by customers, including outage notifications
6 and improved functionality within Evergy’s authenticated portals.
- 7 ▪ Additional payment plans and rates.
- 8 ▪ Improvements in overall grid reliability.
- 9 ▪ Rates and bills that have increased considerably less than inflation and our regional
10 electric utility peers since 2018.
- 11 ▪ Increased visibility and utilization of our community programs and charitable
12 involvement.
- 13 ▪ Improving perception with customers regarding Evergy’s overall sustainability and
14 environmental record.
- 15 ▪ For Missouri customers, very favorable reception for Evergy’s energy efficiency
16 programs.
- 17 ▪ And, the maturation and recall of our new brand name, Evergy, coupled with
18 distance from the merger that created Evergy.

19 **VI. LATE FEES**

20 **Q: Dr. Marke recommends that Evergy’s late fees be lowered to match a short-term debt**
21 **rate of 0.25% annually. How do you respond?**

22 **A:** From a policy standpoint – late payment charges (“LPCs”) or late fees are intended to dis-
23 incentivize people from paying late. If that late fee isn’t large enough to accomplish that

1 task, then there really is no point to charging any late fees. The way our industry currently
2 works, you get to consume our product for 30 days, then you have 23 days to make your
3 payment, then you have another 22 days until you have the potential to be disconnected for
4 non-payment. Anything that the utility can do to shorten that timeline has a net positive
5 effect for the company, shareholders, and yes – even the customers.
6 From an empirical standpoint, the Company has to borrow money every day – if the
7 Company doesn't get paid on time, then the Company has to borrow more cash to keep up
8 operations. What would be the overall cost of capital assuming 20% of our customers paid
9 late? Wouldn't it make sense that the customers who caused us to borrow that money bear
10 at least a portion of that cost? LPCs are a long standing and standard tool for all industries
11 to incent customers to pay on time as well as to capture the cost of carrying that balance
12 for the customer. They are generally accepted as a deterrent to non-payment. The fees are
13 minimal in nature for residential customers and have been suspended due to the pandemic
14 since March of 2020. LPCs are a fair and just way to account for the extra time and effort
15 of the Company, including calls to the contact center and credit and collections work when
16 customers do not pay bills on time. LPCs mitigate these costs that would otherwise
17 increase the Company's cost of service.

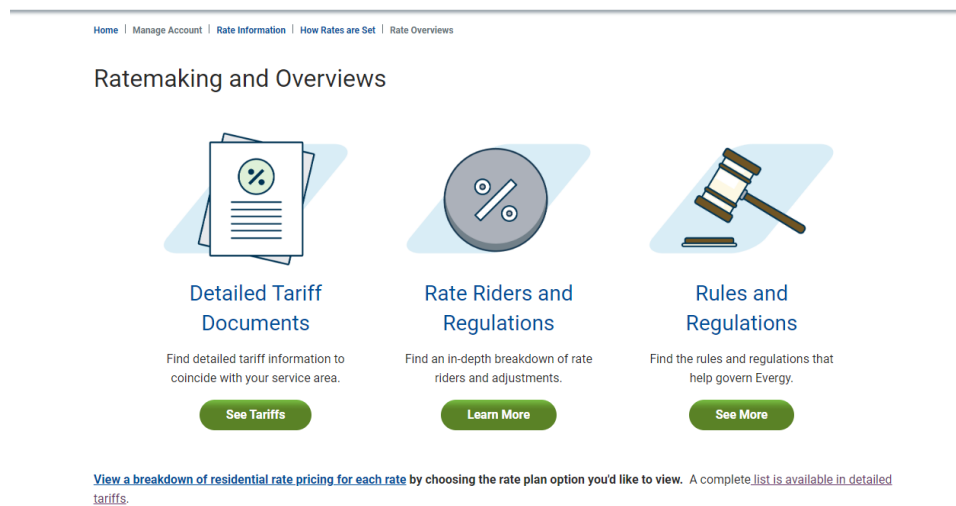
18 **Q: Why are the late fee penalties so different across the utilities?**

19 A: Evergy is a combination of multiple jurisdictions which include separate tariffs that have
20 not had changes in some areas for many years. Different utilities had varying levels of
21 fees for the late payment charge and standardization across these fees has not been an
22 issue in any previous rate case.

1 **Q: How do you respond to Dr. Marke’s claim that the information about late fees is not**
2 **readily available on Evergy’s website?**

3 A: This is simply not true. Under the rate information section of the Evergy website is in-
4 depth information that customers can review regarding our rates, tariffs and rules and
5 regulations such as billing and payment standards. See link for more detail:

6 [https://www.evergy.com/manage-account/rate-information-link/how-rates-are-set/rate-
overviews](https://www.evergy.com/manage-account/rate-information-link/how-rates-are-set/rate-
7 overviews)



8

9

VII. INCOME-ELIGIBLE PROGRAMS

10 **Q: What are Dr. Marke’s recommendations with respect to income-eligible programs?**

11 A: Dr. Marke recommends Evergy develop two new programs that would be equally funded
12 by Evergy’s shareholders and Evergy’s customers (50/50). First, he recommends Evergy
13 propose a Critical Needs Program, similar to that being developed by Spire, Ameren and
14 Empire Electric and Gas Districts. Second, he proposes a Rehousing Pilot Program, similar
15 to that agreed by Ameren Missouri.

16 With respect to Evergy’s existing Income Eligible Weatherization (“IEW”)
17 Program, Dr. Marke recommends that the IEW program budget amounts remain the same

1 for each jurisdiction¹. Ms. Winslow addresses Dr. Marke’s IEW program recommendation
2 in her rebuttal testimony.

3 **Q: What programs does Evergy offer to its income-eligible customers?**

4 A: Evergy offers various income-eligible customer programs, depending on the customer
5 need. A customer’s need may span from payment assistance, to bill pay arrangement
6 assistance, to weatherization of their home, or to direct install of energy efficiency
7 measures to their home’s energy usage. Evergy’s income-eligible programs are supported
8 by tariffs that are Commission-approved during a general rate case, such as the Economic
9 Relief Pilot Program (“ERPP”) and IEW program, for example, or tariffs are approved and
10 offered through our Missouri Energy Efficiency Investment Act (“MEEIA”) portfolio,
11 such as low-income home energy reports², home energy efficiency kits and multi-family
12 energy efficiency programs. Other programs and opportunities for income-eligible
13 customers include:

- 14 ▪ Four-month payment plan open to all customers, regardless of their income-eligible
15 status, to repay an arrears balance.
- 16 ▪ An adjustable date program that accommodates customers who have income solely
17 from social security to request an adjustable due date to pay their bill.
- 18 ▪ A self-identifying medical program for customers that are dependent on
19 electrically-operated life support equipment.

¹ Dr. Marke refers to this program as Low Income Weatherization Assistance Program (“LIWAP”), Page 24, Lines 13-24.

²

- 1 ▪ Cold Weather Rule (“CWR”) also helps protect customers from service
2 disconnection during the coldest winter months with a payment plan to be
3 designated during the CWR timeframe.
- 4 ▪ Eversource recently redesigned the financial assistance component of its website to help
5 customers learn about existing and new payment assistance programs related to the
6 COVID relief funds. The site made it much easier for customers to navigate and
7 link to all the applications. Eversource supported this site with communications to
8 customers.
- 9 ▪ Eversource’s Connect Center that provides face-to-face assistance to customers in need
10 and since its opening in 2018, has helped more than 31,000 customers with direct
11 and customized services. The Eversource Connect team assesses a customer’s account,
12 considers all possible options, directs them to payment assistance as well as energy
13 efficiency tools, prints and helps them complete applications, as well as connecting
14 them to non-utility assistance resources such as career help, childcare, food pantries
15 and more.

16 **Q: Does the Company work with other agencies to promote these programs?**

17 A: Yes. Eversource’s Customer Affairs outreach team has established solid partnerships with
18 many agencies and community partners across our jurisdictions to promote our income-
19 eligible programs and assistance. This team participates in more than 300 events and
20 meetings annually with agencies and customers to help customers access programs. While
21 not an exhaustive list, some of the agencies in which Eversource partners includes: United
22 Way, Salvation Army, Community Action Partners (“CAP agencies”), Bishop Sullivan,
23 Redemptorist and many more partners established through MEEIA’s KC-LILAC initiative

1 (“Kansas City Low-income Leadership Assistance Collaborative”) to bridge together many
2 energy services available to customers including energy efficiency, weatherization and
3 utility assistance.

4 **Q: In addition to its income eligible programs, how does Evergy support its low-income**
5 **communities?**

6 A: Evergy supports its low-income communities in many ways that may not be established
7 through a particular Commission approved program or service, but also through its
8 community investment program, employee volunteerism and employee leadership on
9 community boards. Annually, Evergy invests approximately \$6.7 million in hundreds of
10 community agencies throughout its territory with approximately 40% of these funds
11 directed to agencies and programs that benefit vulnerable communities. Additionally,
12 Evergy directs approximately \$500,000 of the \$6.7 million annually to expand staffing and
13 capacity of the social service agencies that provide assistance on the front lines to
14 vulnerable customers. Evergy also donates approximately \$200,000 annually to direct
15 assistance programs for customers, such as Dollar Aide and Project Deserve.

16 **Q: How do you respond to Dr. Marke’s proposal that Evergy’s shareholders fund his**
17 **two proposed programs, the Critical Needs Program and Rehousing Pilot Program?**

18 A: The funding of Dr. Marke’s proposed programs is addressed in detail in the
19 Rebuttal testimony of Company witness Darrin Ives. I would, though, like to offer my
20 reaction. Dr. Marke provides no data or research to show that Evergy is out of step with
21 utilities around the United States in its revenue requirements funded income eligible
22 programs or in its shareholder funded initiatives. He does not acknowledge the significant
23 amount of dollars, staff and resources Evergy currently deploys to address our lower

1 income customers and customers struggling financially. Rather, Dr. Marke's proposed
2 programs and suggested shareholder funding are just one more example in a long history
3 of Dr. Marke suggesting shareholder funded programs in dockets, proceedings and rate
4 cases. There is no basis for Dr. Marke's proposal and it should be rejected.

5 Evergy is fully supportive of developing and offering the right programs to help
6 customers use energy more efficiently and assist customers avoid disconnection. It is
7 important to us to reduce a customer's energy burden through better understanding of what
8 drives energy usage, which can be attributed to customer behavior, home envelope
9 problems, or inefficient appliances or lack of technology. It is important to work with our
10 communities to ensure sustainability, which Evergy demonstrates on a daily basis. Evergy
11 is doing this comprehensively through its existing payment programs, Evergy Connect
12 facility and extensive outreach done by its customer affairs teams.

13 **Q: How do Dr. Marke's proposed Critical Needs Program and Rehousing Pilot Program**
14 **compare to other programs or initiatives that Evergy is already undertaking?**

15 A: Evergy has similar initiatives across its income-eligible programs that represent
16 components of these two proposed programs and similar outreach to accomplish similar
17 results. For example, in 2018 Evergy opened a customer-facing facility at 17th & Paseo to
18 address the needs of vulnerable customers more holistically. The intent of Connect was to
19 assist the customer in their immediate need, but also layer in energy efficiency tools,
20 payment assistance and when needed, community resources – essentially helping
21 vulnerable customers navigate the many applications and processes needed to tap into
22 resources. The team at Connect is highly trained to de-escalate a customer in crisis and
23 immediately assist no matter the situation. The Connect team is able to sit down with

1 customers to assess their needs and offer up a myriad of possible services and resources in
2 addition to the more traditional payment plans. A summary of these services and
3 demonstrations include:

- 4 ▪ Account review and discussion
- 5 ▪ Utility Assistance Programs
- 6 ▪ Budget Billing enrollment
- 7 ▪ Linkages to other resources (other social service agencies) for other services
- 8 ▪ Medical Program Enrollment
- 9 ▪ Self-serve cash/check payment kiosk
- 10 ▪ Payment options / cash, check, debit, credit
- 11 ▪ Start – Stop service / Reconnections
- 12 ▪ Billing inquiries / Metering concerns
- 13 ▪ Payment plans / budget billing, seasonal, long and short term arrangements
- 14 ▪ Energy usage information & energy savings tips
- 15 ▪ Weatherization
- 16 ▪ Energy Efficiency Products / Thermostat, Rebates, Appliance Recycling
- 17 ▪ Home Protection Products / Surge, Wiring, Hot Water Heater
- 18 ▪ Solar / Information and Vendors
- 19 ▪ Electric Vehicle Information

20 To our knowledge, there is no other electric utility providing a facility with these types of
21 customized services. Since the opening, Connect has served more than 32,000 customers
22 face-to-face. During the pandemic, Connect was closed for only three months. As soon as

1 possible, Evergy reopened Connect with a safety barrier in place to provide similar face-
2 to-face service to customers.

3 Additionally, Evergy Connect launched a ‘virtual desk’ in which customers could
4 set up appointments and ‘meet’ with the Connect Specialists. Connect also hosts events
5 with various social service partners for food insecurity, energy assistance, energy
6 efficiency and weatherization and workforce development.

7 In addition to Connect, Evergy has another team of customer affairs advisors who
8 coordinate and/or participate in more than 330 external meetings and events annually to
9 assist customers throughout the service territory. Through these meetings and events this
10 team interacts with around 30,000 customers annually. Examples of these programs include
11 assistance events at social service agencies, food drives, educational sessions with social
12 service staff and more. For smaller events, the Customer Affairs team is able to look up
13 accounts and offer immediate information to the customers and help them access and
14 navigate payment assistance, medical programs and energy efficiency programs. This team
15 has also conducted social media events and webinars for customers and social service
16 agencies. From 2019 – 2021, Evergy has helped customers secure more than \$85M in
17 assistance throughout its service territory:

2021	YTD		
	Agency	Qty	Dollars
ECIP MO	9217	\$	4,217,322.13
LIHEAP MO	8312	\$	1,939,637.94
LIEAP KS METRO	3514	\$	1,937,943.43
Other Sources MO & KS METRO	1454 8	\$	7,607,526.91
LIEAP KS CENTRAL	4581 3	\$	24,991,473.42
Other Sources KS CENTRAL	1509 0	\$	6,605,919.78
Total	9649 4	\$	47,299,823.61

2020	YTD		
	Agency	Qty	Dollars
ECIP MO	9040	\$	3,238,331.07
LIHEAP MO	4112	\$	1,092,456.00
LIEAP KS METRO	2378	\$	933,351.14
Other Sources MO & KS METRO	8633	\$	2,523,148.77
LIEAP KS CENTRAL	1804 9	\$	11,513,987.88
Other Sources KS CENTRAL		\$	2,817,734.81
Total	4221 2	\$	22,119,009.67

2019	YTD		
	Agency	Qty	Dollars
ECIP MO	8519	\$	3,142,509.47
LIHEAP MO	4528	\$	1,230,169.85
LIEAP KS METRO	1190	\$	584,078.76
Other Sources MO & KS METRO	8618	\$	1,966,468.27
LIEAP KS CENTRAL		\$	6,609,902.83
Other Sources KS CENTRAL		\$	2,951,489.31
Total	2285 5	\$	16,484,618.49

1
2 Internally, Evergy has placed ‘flag indicators’ on nearly 8,200 customer accounts (to date
3 in 2022) that shows the customer may likely be eligible for emergency assistance because
4 they have received LIHEAP EA assistance in the past. This allows Customer Service
5 Representatives to quickly see this eligibility and refer customers calling in to assistance
6 programs.

7 Evergy also offers Dollar Aide, which is funded by customer and Evergy employee
8 donations and Evergy matches all customer donations with a 50-cent credit to every \$1 and
9 matches employee donations \$1 to \$1. In 2021, this program provided approximately
10 \$200,000 to customers. The MidAmerica Assistance Coalition manages Dollar Aide funds
11 and distributes the funds to work with local agencies who in turn work with customers and

1 place payments on customer accounts. Among other information, the agencies provide
2 specific information regarding 2-1-1. Both Evergy’s Customer Affairs outreach team and
3 its Connect Center team work one on one with customers to identify the right agency(ies)
4 to contact.

5 Similarly, while Rehousing Pilot Program is targeted to assist transitional housing
6 customers, Evergy has worked closely with Missouri Housing Resources and transitional
7 housing facilities to effectively distribute Emergency Rental Assistance Program
8 (“ERAP”) funding. The ERAP funding, along with LIHEAP and ERPP is distributed
9 through many community action and social service agencies and includes financial
10 assistance for rent and utility arrearages for the period beginning April 2020 and up to three
11 months of forward rent and prepaid fuel utility assistance. Evergy understands that this
12 program will continue through 2023. Evergy’s existing Connect facility and customer
13 outreach programs continue to be an effective mechanism to help distribute federal, state
14 and Evergy funds directly to customers.

15 **Q: Do you recommend that the Commission approve the Critical Needs Program and**
16 **Rehousing Pilot Program?**

17 A: No, I do not. Dr. Marke has not provided any research to support these proposed programs;
18 he has not demonstrated how these programs differ from other programs that Evergy
19 currently offers; nor has he demonstrated that Evergy’s current programs and services are
20 not meeting the needs of the targeted customers for these two proposed programs.
21 Additionally, with the millions of dollars still available through ERAP, I don’t think it
22 would be a prudent use of dollars to layer on new programs.

23

1 VIII. CLEAN CHARGE NETWORK

2 **Q: How does Dr. Marke characterize Evergy’s Clean Charge Network in his Direct**
3 **testimony?**

4 A: Dr. Marke characterizes Evergy’s Clean Charge Network (“CCN”) as “a disappointment.”³
5 He claims that ratepayers have not received downward pressure on rates or mass adoption
6 as “compensation” for the Clean Charge Network. Furthermore, citing *a single*
7 comparative example of St. Louis EV adoption later in his testimony, he claims that
8 “Evergy’s CCN [Clean Charge Network] investments *overwhelmingly* [emphasis added]
9 suggests that ubiquitous EV charging stations are not strongly correlated with EV
10 adoption.”⁴

11 **Q: Dr. Marke asserts that three counties inclusive of and around St. Louis have more**
12 **registered electric vehicles than Evergy’s Missouri service territories? Is this**
13 **accurate?**

14 A: No, it is not. Evergy addressed this difference with Dr. Marke’s testimony in File No. ET-
15 2021-0151; however, he continues to rely on unreliable data to reinforce his erroneous
16 conclusions. Dr. Marke’s insistence on providing unreliable data to the Commission on
17 this topic is irresponsible, misleading and I have to assume intentional to orchestrate a
18 negative narrative on this program.

19 **Q: Why is there such a large discrepancy between the actual number of EVs in Evergy’s**
20 **Missouri service territory and the population asserted in OPC testimony?**

21 A: OPC’s values and conclusions are based on raw vehicle registration data, which is easy to
22 obtain but not a reliable source of EV population data. This data is subject to classification

³ Marke Direct Testimony, Page 17, Line 13.
⁴ Marke Direct Testimony, Page 17, Lines 18-19.

1 errors caused by general unfamiliarity with electric vehicles and the dizzying array of
2 battery-containing powertrains. For example, over the years the Ford Fusion has come in
3 gasoline, non-plugin hybrid (i.e., non-EV) and plugin hybrid (i.e., EV) configurations.
4 Similarly, several other models such as the Toyota Prius and Hyundai Sonata have been
5 concomitantly offered in both EV and non-EV powertrains.

6 Evergy and other utilities require high-quality EV population estimates and
7 forecasts to measure current demand and inform grid planning processes. Evergy receives
8 quarterly EV population updates and annual EV adoption forecasts from EPRI. EPRI's
9 EV population estimates utilize source data from IHS Markit⁵. In creating its data, IHS
10 Markit takes the critical step of analyzing each vehicle's identification number ("VIN") to
11 determine whether the vehicle's powertrain qualifies as an EV. For this reason, the EV
12 population data from IHS Markit are much more accurate than estimates based on raw
13 vehicle registration data.

14 The inaccuracy of EV population data in OPC's ET-2021-0151 rebuttal testimony
15 is further demonstrated by examining the ratio of all-battery electric vehicles ("BEV") to
16 plug-in hybrid electric vehicles ("PHEV")⁶. During the period 2011 through 2021, 60%
17 of new EV sales in Missouri were BEVs and 40% were PHEVs. This ratio mirrors the
18 nationwide split between new sales of BEVs and PHEVs during the same period (see
19 below). OPC's EV population data for Evergy's Missouri territory should have reflected
20 the 60/40 ratio of historical sales, but it did not. Instead, the same OPC testimony that
21 woefully underestimated the quantity of EVs in Evergy's Missouri service territory also
22 claimed that the ratio of BEVs to PHEVs was 93/7. This nonsensical result conclusively

⁵ <https://ihsmarkit.com/products/auto-market-statistics-vio.html>

⁶ <https://www.atlasevhub.com/materials/automakers-dashboard/>

1 proves the “data” and associated inferences in OPC’s referenced testimony are without
 2 merit.

EV Sales in Missouri			
	BEV	PHEV	Total (EV)
2011 through April, 2022:	11,579	6,959	18,538
2Q22 (through Apr)	237	200	437
1Q22	1,091	586	1,677
4Q21	913	635	1,548
3Q21	1,042	464	1,506
2Q21	833	502	1,335
1Q21	730	205	935
2011 through YE2021:	6,733	4,367	11,100
	61%	39%	100%

EV Sales Nationwide			
	BEV	PHEV	Total (EV)
2011 through April, 2022:	1,762,425	916,847	2,679,272
2Q22 (through Apr)	51,001	17,516	68,517
1Q22	157,244	43,991	201,235
4Q21	145,752	47,253	193,005
3Q21	129,201	45,582	174,783
2Q21	115,652	59,512	175,164
1Q21	97,794	33,790	131,584
2011 through YE2021:	1,065,781	669,203	1,734,984
	61%	39%	100%

Source: <https://www.atlasevhub.com/materials/automakers-dashboard/>

3
 4 **Q: How many EVs does Evergy have in its Missouri service territory?**

5 A: Per data from EPRI/IHS Markit, Evergy’s Missouri service territory had 3,172 EVs at the
 6 end of 2020 and 4,668 EVs as of year-end 2021.

7 **Q: Does the St. Louis area have more EVs than the Kansas City area?**

8 A: No. This question was explored last year in response to OPC’s claims in rebuttal testimony
 9 in File No. ET-2021-0151. This results of Evergy’s analysis are as follows:

- 10 ▪ In terms of core-based statistical area, Kansas City had 6% more EVs per
 11 capita than St. Louis as of 9/30/2020.
- 12 ▪ Utilizing OPC’s rationale of selecting adjacent localities radiating from the
 13 city core, Evergy determined that the Kansas City area defined as Johnson
 14 County, Kansas and Jackson County, Missouri has 8% more EVs per capita

1 than St. Louis City, St. Louis County, and St. Charles County as of
2 6/30/2021.

3 **Q: To provide context for the Clean Charge Network and business transportation**
4 **initiatives included with this filing, can you share details of what's happening in the**
5 **EV market?**

6 A: Absolutely. During the past two years there has literally been a worldwide commitment to
7 transportation electrification. Global automakers are planning to spend more than \$500
8 billion dollars on EVs and batteries through 2030⁷. This level of investment will
9 significantly increase the capability, affordability, and reliability of electric vehicles.
10 Regarding this latter point, consider:

- 11 ▪ About 30 EV models were available at the end of the first full year of Clean
12 Charge Network operation (2016⁸)
- 13 ▪ About 70 EV models are available currently
- 14 ▪ Over 110 EV models are expected to be available domestically by 2026⁹

15 As to be expected given the ongoing surge in customer choice, Evergy estimates that the
16 population of EVs in its Missouri service territory could quintuple to roughly 25,000 by
17 the end of 2026.

18 **Q: Is customer usage at the Clean Charge Network charging stations increasing?**

19 A: Yes. It is easy to lose sight that the Clean Charge Network was only in service for four full
20 years prior to the coronavirus pandemic. Customer mobility is only now rebounding in
21 earnest, and we are seeing that in the data. Consider:

⁷ <https://www.reuters.com/business/autos-transportation/exclusive-global-carmakers-now-target-515-billion-evs-batteries-2021-11-10/>

⁸ <https://www.forbes.com/sites/rpapier/2017/02/05/u-s-electric-vehicle-sales-soared-in-2016/?sh=2a74e77e217f>

⁹ <https://www.atlasevhub.com/materials/automakers-dashboard/>

- 1 ▪ Clean Charge Network usage last June was over 60% higher than the next
2 highest June (2021).
- 3 ▪ Despite the Omicron variant’s major impact on customer mobility during
4 the first quarter of 2022, year-to-date Clean Charge Network usage through
5 June is over 33% higher than the next highest year (2019).

6 **Q: Considering the increasing level of private investment in public charging**
7 **infrastructure, what is the role of the Clean Charge Network?**

8 A: The Clean Charge Network allows Evergy to supply its EV-driving customers with the
9 electricity they need where they work and live. Evergy’s network provides a backbone of
10 controllable, well-maintained charging stations that is currently used by customers and is
11 increasingly important as EV adoption accelerates.

12 Although Evergy does not plan to materially increase the number of Clean Charge
13 Network stations in the coming years, Evergy’s role to serve our customers through the
14 Clean Charge Network was recognized by the Commission’s ruling in File Nos. ET-2021-
15 0151 and ET-2021-0269. In this ruling, Commission increased the previously established
16 caps on the number of Clean Charge Network charging stations Evergy may install at its
17 discretion and subject to normal prudence review in a future rate case. Specifically, the
18 station caps were increased by 26 and 50 in Evergy Missouri West and Evergy Missouri
19 Metro, respectively.¹⁰

¹⁰ *Order Granting Motion for Clarification, Re: Application of Evergy Metro, Inc. D/b/a Evergy Missouri Metro and Evergy Missouri West d/b/a Evergy Missouri West for Approval of a Transportation Electrification Portfolio*, File No. ET-2021-0151 (issued February 2, 2022).

1 **Q: Is it common for a utility to own and operate charging stations while also providing**
2 **incentives for non-utility stations?**

3 A: Yes. Evergy's hybrid utility/private approach to EV charging infrastructure is common
4 within industry, in part because private third-party investors do not approach site selection
5 from the same perspective as regulated utilities such as Evergy. Rather than being
6 concerned with establishing an "ecosystem" of charging to serve all customers, including
7 underserved areas such as secondary and tertiary highway corridors, private investment is
8 typically focused on a narrower range of goals such as individual site profitability or
9 providing a beneficial service to customers and employees.

10 In summary, Evergy's proposed commercial rebate program and continued
11 operation of the Clean Charge Network benefits all customers by:

- 12 ■ Accelerating the availability of public charging infrastructure
- 13 ■ Ensuring charging services are available to a broader range of customers
14 than would be served by the proposed rebate program, which will be utilized
15 by investors who have a narrower range of business objectives, and
- 16 ■ Continuing to reduce range anxiety, increase EV adoption and moreover,
17 increase electric sales to put downward pressure on rates for all Evergy
18 customers.

19 **Q: Earlier in your testimony, you quoted Dr. Marke's characterization of the Clean**
20 **Charge Network as a "disappointment". Can you respond to that?**

21 A: Yes. While Dr. Marke may characterize the Clean Charge Network as a disappointment
22 on the fact that its costs currently exceed revenues as presented in this case, I vehemently
23 disagree - even if the math in this filing supports that. Deeming the success or failure of

1 the Clean Charge Network should not be solely based on whether its current revenues
2 exceed costs. Rather, there are a host of additional considerations that demonstrate not
3 only the CCN's current value to our customers, but its increasing value going forward. For
4 example:

- 5 ▪ The CCN provides an ecosystem of well-maintained charging stations
6 under a convenient, common-pay interface.
- 7 ▪ The CCN is there when our customers need it; each charging site is currently
8 used at least once per day on average, and the number of sessions is
9 increasing.
- 10 ▪ Experience with the CCN has informed Evergy's Commercial Rebate
11 Program design, such as the program's data sharing and demand response
12 requirements
- 13 ▪ The number of EV models available to Evergy customers is expected to
14 nearly quadruple during the period 2016 – 2026.
- 15 ▪ The 5-year compound annual growth rate of EVs in Evergy's Missouri
16 service area is 37% (i.e., doubling every two years).

17 Beyond the above, it should be noted that EV charging is still an immature industry.

18 None of the alternative approaches to the Clean Charge Network has existed long enough
19 to conclusively demonstrate an ability to reliably serve Evergy customers over many years.
20 Indeed, many of these alternative public charging approaches involve incentives that attract
21 developers to *construct* charging stations but not to *reliably operate* these stations.
22 Although OPC is eager to declare the Clean Charge Network a failure, the story is half-
23 told and alternative models are far less proven. That being the case, it is premature to

1 declare the Clean Charge Network inferior to alternative approaches for providing electric
2 service to Evergy's EV customers.

3 IX. TIME OF USE

4 **Q: What does Dr. Marke state is the primary benefits of AMI?**

5 A: Dr. Marke states on Page 10 of his Direct testimony that the primary benefit of AMI meters
6 is the ability to price electricity closer to the "true cost of service" through TOU rates.

7 **Q: Do you agree with Dr. Marke?**

8 A: As I stated earlier, I agree that employing pricing to customers is a benefit of AMI meters
9 but I do not agree that it is a primary benefit.

10 **Q: Does Evergy offer TOU rates to its customers?**

11 A: Contrary to Dr. Marke's response, Evergy does offer TOU rates to its customers. The
12 Commission approved Evergy offering opt-in (versus default) TOU rates to its customers
13 by October 2019. The S&A approved within the 2018 rate case and signed by stakeholders,
14 including OPC, cited an enrollment goal of 1,750 customers (by jurisdiction) by December
15 31, 2020. Ms. Winslow submitted in her Direct testimony that as of December 31, 2021,
16 Evergy exceeded the enrollment target with a total of 6,080 active enrollments (3,172
17 enrollments in Evergy Missouri West and 2,908 enrollments in Evergy Missouri Metro).
18 As of July 5, 2022, Evergy increased TOU enrollment *by an additional 13 percent* with a
19 total of 6,895 active enrollments (3,793 enrollments in Missouri West (216% achievement)
20 and 3,102 enrollments in Missouri Metro (177% achievement)). Evergy has also proposed
21 other rate options within this rate case and introduced those rates in its Direct filing.

1 **Q: How do you deem the success of Evergy’s TOU offer?**

2 A: Evergy’s TOU offer has been very well communicated and successful, as discussed in Ms.
3 Winslow’s Direct testimony. Evergy (1) collaborated with stakeholders in depth every step
4 of the way as defined in the 2018 S&A; (2) presented its innovative marketing campaign
5 and its customer education and tools to the Commission; and (3) completed third-party
6 interim and final Evaluation, Measurement and Verification (“EM&V”) Reports in
7 collaboration with stakeholders. In terms of key successes, Evergy exceed its enrollment
8 goal by over 200 percent and the EM&V indicates that participating customers reduced
9 their energy consumption and their summer coincident peak demand, and participating
10 customers, on average, saved annually. In addition, 82 percent of participating customers
11 were highly satisfied and 79% thought that the TOU rates met their expectations very
12 well.¹¹ All of these factors indicate a very successful program.

13 **X. UPLIGHT ENGAGEMENT**

14 **Q: What does OPC Witness Angela Schaben recommend with respect to Evergy’s**
15 **contract with Uplight?**

16 A: Ms. Schaben recommends that the Commission disallow all costs for the Uplight software
17 from rates. She recommends the disallowance for several reasons: first, on the basis that
18 Evergy’s contract with Uplight is an inappropriate affiliate transaction; second, that the
19 Uplight contract is single-source and that no RFP was conducted for the software and
20 services Uplight is providing Evergy; third, that results expected as part of the Scope of
21 Work and contract with Uplight inappropriately mirror metrics that are part of Evergy’s
22 executive incentive compensation scorecard; and, finally that she disagrees with the

¹¹ Guidehouse Final EMV, Section 3.3.5.1

1 method by which Evergy is accounting for the Uplight contract. I will address and refute
2 the first three issues in my Rebuttal testimony. Ron Klote will address Uplight accounting
3 concerns in his Rebuttal testimony.

4 **Q: Is Uplight an affiliated entity of Evergy or Evergy Ventures, thereby qualifying the**
5 **contract between Evergy and Uplight as an affiliate transaction?**

6 A: No. Under Chapter 20 of the Missouri State Code of Regulations dealing with Electric
7 Utilities, Uplight is not an affiliate of Evergy or Evergy Ventures. First, 20 CSR 4240-
8 20.015(1)(C) creates the rebuttable presumption that an entity is an affiliate if an electric
9 utility has beneficial ownership of ten percent (10%) or more of voting securities in that
10 entity. Evergy Ventures owned approximately one percent of Uplight equity. That equity
11 was not the result of a direct investment in Uplight. Rather, it was converted from an
12 investment in EnergySavvy, which was purchased by Tendril and Rubicon Partners in
13 2019, in a transaction that ultimately created Uplight. In addition, Evergy Ventures and
14 Evergy exert no control, give no support to and have no governance function whatsoever
15 with Uplight. Evergy Venture's investment in Uplight was completely passive. Evergy
16 and Evergy Ventures do not have now, and have never had in the past, a voting seat on
17 Uplight's Board of Directors or received regular access to material non-public financial
18 information. In fact, when Uplight announced its March 3, 2021, an investment deal with
19 Schneider Electric, Huck Capital, and AES, Evergy Ventures was given less than 24-hour
20 notice of the transaction and had no role in its creation or announcement.

1 **Q: Did Evergy's July 8, 2021, contract with Uplight in any way financially benefit,**
2 **improve or impact Evergy Venture's equity interested in Uplight?**

3 A: No. When Uplight announced its investment deal with Schneider, Huck and AES on
4 March 3, 2021, the financial terms for the disposition of Evergy Venture's equity position
5 in Uplight had already been set as part of the transaction. Evergy's contract with Uplight
6 on July 8, 2022, did not alter in any way those financial terms agreed to by Uplight as part
7 of the transaction prior to its announcement. In fact, the investment transaction originally
8 scheduled to close prior to Evergy's contract with Uplight in July of 2021. However, the
9 Uplight investment transaction with Schneider, Huck and AES needed to obtain multiple
10 regulatory approvals, one of which was from the Committee on Foreign Investment
11 ("CFIUS"). That approval was originally scheduled for May of 2021, but ultimately was
12 not obtained until July of that year. But for the delay in obtaining regulatory approvals,
13 the transaction would have closed prior to the contract date between Uplight and Evergy
14 Ventures would not have had any equity interest whatsoever in Uplight.

15 **Q: Did Evergy violate its supply chain policy by not using a Requests for Proposal**
16 **("RSPs") in contracting with Uplight, as alleged by Ms. Schaben?**

17 A: No. An RFP is not always required. In some cases, where there is no comparable product
18 or service in the marketplace and Evergy has a longstanding relationship with an entity, an
19 RFP is not required and a sole source contract is justified.

20 Evergy has a more than twelve-year relationship with Uplight and has entered into
21 multiple contracts and has master service agreements with Uplight prior to the current
22 contract. Evergy knows Uplight and its product offerings very well. In addition, Evergy
23 has multiple leaders in the business, IT, supply chain and its leadership team that have

1 extensive experience with and knowledge of the companies, software and digital solutions
2 available in the marketplace to enhance customer experience and service. Evergy
3 rigorously reviewed all of the solutions that will be provided by Uplight holistically relative
4 to other potential providers. The Company concluded that no other company in the market
5 at that time or currently provides the holistic solution that Uplight provides. The only other
6 software provider competing in this ecosystem is Oracle OPower. Evergy also knows
7 Oracle OPower and their product offerings. We also know their pricing, as we have a
8 contract with them in place at this time for some of the software that Uplight will replace
9 in 2023.

10 Evergy did not enter into a contract with Uplight to replace Oracle OPower.
11 Replacement of existing Oracle OPower products is only one facet of the Uplight contract.
12 Uplight provides comparable digital product solutions to Oracle OPower for residential
13 customers and enhanced digital solutions for business customers not available from Oracle
14 OPower. In addition, Uplight provides significant additional functionality, including a
15 mezzanine layer of software that is designed to reduce software deployment cycles, reduce
16 operational cost and enable significantly easier integration with other software solutions
17 and providers. Thirdly, Uplight's product suite includes solutions (for example,
18 Marketplace, Orchestrated Energy, Business Customer Solutions) either not available in
19 Oracle OPower's current portfolio and/or are not currently included in our contract with
20 Oracle OPower. Finally, the way that the Evergy's contract is constructed with Uplight,
21 customers receive the benefit of an industry-leading set of solutions up front as well as
22 access to everything Uplight develops over the term of the contract.

1 In short, Evergy determined that the long-term product strategy of Uplight was
2 unique in the industry and aligned with Evergy’s enhanced customer experience strategy
3 and ability to reduce costs. Uplight redefines how customer-facing solutions interact with
4 our CIS, enabling the rapid deployment of a more secure, comprehensive and integrated
5 set of best-in-class customer solutions while the ability to capitalize the software at a lower
6 overall cost to Evergy customers.

7 **Q: Why does Evergy’s Officer Incentive Compensation Scorecard and the contract with**
8 **Uplight share metrics in common?**

9 A: The metrics on Evergy’s Officer Incentive Compensation Scorecard are priority outcomes
10 for Evergy’s stakeholders—customers, communities and investors. Evergy has a clear
11 strategy of reducing operational cost while improving customer experience and
12 satisfaction. Those priorities are reflected on our officer’s scorecard. Ms. Schaben’s
13 implication that there is a nefarious connection between those incentives and the desired
14 outcomes specified in the contract with Uplight is baseless. Rather, Evergy works to align
15 all of its operational activities and vendor contracts to advance the enterprise goals of the
16 organization. That is what this represents, alignment of priorities consistent with multiple
17 other contracts Evergy has and best-practice in business generally. If anything, the results
18 expected in the Uplight contract are more specific and defined than other comparable
19 software contracts to reflect the specific benefits and expectations that Evergy has for this
20 relationship and software implementation.

1 **Q: Do you have any other comments regarding Ms. Schaben’s proposed disallowance of**
2 **the Uplight contract?**

3 A: Yes. Evergy Ventures holds equity and non-equity interests in multiple companies in the
4 technology and software sector that interact with electric utilities. In multiple instances,
5 those companies are evaluated by Evergy for potential strategic or commercial contracts
6 with its utilities. However, the fact that Evergy Ventures holds an interest in a company
7 does not determine or positively influence the decision of Evergy or its utilities to enter
8 into an agreement with any of those companies. In some cases, Evergy Ventures portfolio
9 companies have not been chosen in an RFP and Evergy has chosen to contract with a
10 competitor company. In other cases, Evergy might have had an interest in contracting for
11 services with an Evergy Ventures portfolio company, but was unable to reach acceptable
12 terms with Evergy’s supply chain, risk and contracting requirements. And, in all cases
13 Evergy Ventures does not seek to influence the process and any Evergy Ventures portfolio
14 company is exposed to the same processes, contracting procedures and requirements of any
15 other company.

16 Uplight is not and was not an affiliate of Evergy under the definitions of the
17 Missouri’s State Code of Regulations. Uplight was a passive investment of Evergy
18 Ventures and Evergy’s commercial contract with Uplight had no impact or benefit to
19 Evergy Venture’s equity disposition or create any incremental financial value for Evergy
20 Venture’s, and as a result Evergy. Evergy’s commercial contract with Uplight was
21 formulated to improve customer experience, modernize and make more agile Evergy’s
22 customer-facing systems, and over time to reduce the cost of providing customer service.
23 Uplight was subjected to rigorous contracting requirements from Evergy, the terms of

1 which were negotiated and beneficial relative to Uplight’s standard rates for those products
2 and services. Uplight software is installed, used and useful, and already providing value
3 to Evergy’s Missouri customers—value that is only going to increase as the contract ages.

4 **Q: Is the Uplight software MEEIA related?**

5 A: No, it is not. Ms. Schaben continually refers to the Uplight software as “MEEIA” Uplight
6 software. The Uplight software provides personalized digital engagement with residential
7 and commercial utility customers through various solutions that include, behavioral
8 programs, such as home energy reports, energy efficiency, electrification, rates, and online
9 product transactions. However, the capital cost of the software is requested to be recovered
10 as part of this rate case – it should not be characterized as a “MEEIA software”.

11 **Q: Does that conclude your testimony?**

12 A: Yes, it does.

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

In the Matter of Evergy Metro, Inc. d/b/a Evergy)
Missouri Metro's Request for Authority to) Case No. ER-2022-0129
Implement A General Rate Increase for Electric)
Service)

In the Matter of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West's Request for Authority to) Case No. ER-2022-0130
Implement A General Rate Increase for Electric)
Service)

AFFIDAVIT OF CHARLES A. CAISLEY

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Charles A. Caisley, being first duly sworn on his oath, states:

1. My name is Charles A. Caisley. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Senior Vice President – Public Affairs and Chief Customer Officer.

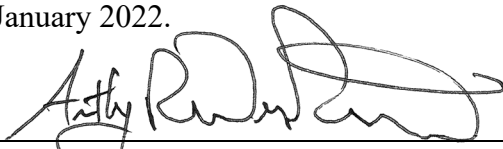
2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of Evergy Missouri Metro and Evergy Missouri West consisting of fifty-three (53) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

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.



Charles A. Caisley

Subscribed and sworn before me this 13th day of January 2022.



Notary Public

My commission expires: 4/26/2025

