

Exhibit No.: _____
Issue(s): CIS Customer Portal Access/Evaluation of
Arizona Public Service Company's Customer
Education Plan/Bill Acronyms & Definitions
Witness/Type of Exhibit: Kremer/Direct
Sponsoring Party: Public Counsel
Case No.: ER-2022-0129 and ER-2022-0130

DIRECT TESTIMONY

OF

LISA A. KREMER

Submitted on Behalf of the Office of the Public Counsel

**EVERGY METRO, INC. D/B/A
EVERGY MISSOURI METRO
AND
EVERGY MISSOURI WEST, INC. D/B/A
EVERGY MISSOURI WEST**

CASE NOS. ER-2022-0129 AND ER-2022-0130

June 8, 2022

**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)
Implement a General Rate Increase for Electric)
Service) Case No. ER-2022-0129

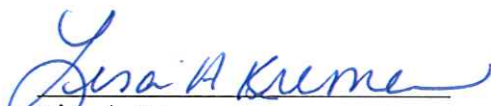
In the Matter of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West’s Request for Authority to)
Implement a General Rate Increase for Electric)
Service) Case No. ER-2022-0130

AFFIDAVIT OF LISA A. KREMER

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Lisa A. Kremer, of lawful age and being first duly sworn, deposes and states:

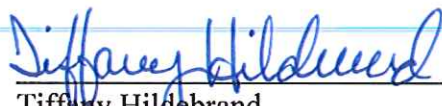
1. My name is Lisa A. Kremer. I am a Consultant for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my direct testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.


Lisa A. Kremer

Subscribed and sworn to me this 8th day of June 2022.



TIFFANY HILDEBRAND
My Commission Expires
August 8, 2023
Cole County
Commission #15637121


Tiffany Hildebrand
Notary Public

My Commission expires August 8, 2023.

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DIRECT TESTIMONY

OF

LISA KREMER

**EVERGY METRO
CASE NO. ER-2022-0129**

**EVERGY WEST
CASE NO. ER-2022-0130**

1 **I. INTRODUCTION**

2 **Q. Please state your name, title, and business address.**

3 A. Lisa Kremer. Consultant for the Office of the Public Counsel (“OPC”). 705 Briarwood
4 Court, Jefferson City, MO, 65109.

5 **Q. Please describe your education and employment background.**

6 A. I have a Bachelor of Science Degree in Public Administration and a Master’s Degree in
7 Business Administration from Lincoln University. I am also a Certified Internal Auditor
8 (“CIA”) and a member of the Central Missouri Institute of Internal Auditors. I have
9 approximately 35 years of utility regulatory experience with most of my experience
10 occurring while serving on the Staff of the Missouri Public Service Commission (“Missouri
11 PSC” or “PSC”) performing and leading management, operational and service quality
12 audits, and reviews as well as other utility investigatory work and projects. After my
13 employment with the Missouri PSC, I was employed for several years by the Missouri
14 Division of Energy as Manager of the Energy Policy and Resources Unit. A listing of more
15 specific utility regulatory projects, audits, investigations and reviews I have participated in
16 and testimonies I have filed are included as Schedule 1 to my testimony.

17 **Q. What is the purpose of your Direct Testimony?**

18 A. The purpose of my Direct Testimony is three-fold. First, I will explain and support the
19 Office of Public Counsel’s recommendation that it be provided on-line access to a sample
20 of anonymous existing customer accounts or simulated customer accounts within Evergy’s
21 Customer Information System (CIS). This access will enable the OPC to review,

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1 understand, and analyze what Evergy customers specifically experience in real time within
2 the Company's customer portal.

3 Secondly, the purpose of my testimony is to introduce to the Company, Commission, and
4 other interested stakeholders a report entitled "An Evaluation of Arizona Public Service
5 Company's Customer Education Plan and Its Implementation," ("report"), prepared by
6 Barbara R. Alexander, Barbara Alexander Consulting LLC, filed May 19, 2020, in Docket
7 Nos. E-01345A-19-0236 and E-01345A-19-003. This report provides information that
8 may be useful and of interest to the Missouri Public Service Commission, Evergy, and
9 stakeholders as they contemplate, evaluate, and work toward effective customer
10 education plans for future rate transitions and existing customer education efforts.

11 Third, I will explain and support why customer bills should explicitly spell out and avoid
12 technical acronyms that customers may not otherwise understand but who are entitled to
13 understand, to the greatest extent possible. Such avoidance of abbreviations will make bill
14 detail clearer, reduce confusion and improve customer experience. In addition, the
15 Company should strive, to the extent possible, to provide definitions of key technical terms
16 directly on the bill.

17 **Q. Would you explain your reference to use of the name "Evergy" in your testimony?**

18 A. In this testimony, my use of the name Evergy refers to both Evergy Metro (the utility that
19 was previously known as Kansas City Power & Light Company) and Evergy West (that
20 refers to the Evergy utility previously known as KCP&L – Greater Missouri Operations
21 Company). All references made to "the Company or Companies" is intended for both
22 Evergy companies of Evergy Metro and Evergy West.

23 **ANONYMOUS OR SIMULATED CIS CUSTOMER ACCOUNT ACCESS FOR**
24 **THE OFFICE OF THE PUBLIC COUNSEL**

25 **Q. What is a Customer Information System and what purpose does it serve for**
26 **Evergy and its Missouri customers?**

27 A. As provided by Mr. Forrest Archibald's Direct Testimony in case nos. ER-2018-0145, and
28 ER-2018-0146, page 3 line 16 through page 4 line 5, "the customer information system is

1 a critical component of the meter-to-cash value chain for any meter based delivery type
2 utility. The CIS interlinks the customer information to the consumption and metering
3 processes, via the MDM (Meter Data Management system) all the way through to
4 payments, collections and other downstream processes that affect a utility's ability to
5 support state commission requirements and report revenue. Customer information systems
6 can include multiple sub-systems depending on the regulatory and operational
7 requirements but at a minimum are inclusive of the metering and consumption (MDM),
8 billing, and collections functions and online portals for customers to perform self-serve
9 functions like bill payment and energy usage awareness, among others. For example, in
10 our new One CIS Solution, the MDM will hold all the consumption data for consumers
11 and will play a key role in consumption analysis and billing; unlike our current legacy
12 systems."

13 **Q. What value does the Companies' CIS on-line customer account portal have to**
14 **regulated customers?**

15 A. The CIS on-line customer account portal is a direct customer-facing tool for energy usage,
16 billing, and other information and engagement between the Companies and its customers.
17 The customer account access through the Companies' CIS provides on-line customer
18 connection to its regulated utility provider. In addition to the Companies' call and/or
19 contact center, the customer billing portal is the primary pathway customers have to many
20 critical pieces of utility information including their specific account data such as bill
21 amounts and historical usage, customer education messaging, payment history, specific bill
22 line items, and others. The CIS provides customer access and interface behind "the
23 curtain" where important customer information is collected, housed, used, and presented
24 to customers on systems for which those same customers are paying. Such customer
25 interface and interaction falls within OPC's statutory authority as the agency responsible
26 for representing and protecting the public interest.¹

1 Mo. Rev. Stat. § 386.710 (“(2) He may represent and protect the interests of the public in any proceeding before or appeal from the public service commission;”).

1 **Q. What is the purpose of permitting OPC access to a sample of anonymous existing or**
2 **simulated customer accounts?**

3 A. Providing OPC access to a sample of existing or simulated customer accounts will permit
4 the Office of Public Counsel the ability to observe, understand, and experience what
5 Evergy customers experience as they are served by the Companies including changes to
6 those experiences. Presently, an Evergy CIS customer log-in barrier exists for the OPC,
7 making it unable for the office to have access to specific customer-facing web-portal
8 screens and content such as:

- 9 • Account Summary
- 10 • Make A Payment
- 11 • Payment History
- 12 • Bill History
- 13 • Preferences
- 14 • Energy Analyzer
- 15 • 24-Month Report
- 16 • Energy Usage

17 Each of the above items are only accessible with a specific “customer login and passcode,”
18 restricting the information and the manner in which it is presented to Evergy customers
19 only. In addition, the Companies’ CIS access includes a customer specific “message board”
20 that the OPC requests to access to review the changing messaging provided to residential
21 (TOU and non-TOU residential samples) small commercial and industrial customers, from
22 each of the general service rate classes. Evergy’s website indicates “the message board
23 provides helpful and timely information about your rates, special programs, electrical
24 safety, energy efficiency and payment options.”² Utility messaging to its customers is an
25 important aspect of customer service and customer experience and access to the message
26 board will provide the OPC insight into Company communications with its customers.

² Evergy’s Website www.evergy.com Section: Understanding My Bill.

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1 Examples of the specific items within the Companies' customer information system that
2 require customer login and passcode access are attached in Schedule 2.

3 **Q. Can the OPC request specific customer portal screens from Evergy when the office**
4 **has received and is responding to customer complaints or inquiries or at other times?**

5 A. Yes. However, providing the Office of the Public Counsel with access to the account portal
6 on an on-going basis as envisioned and described in this testimony would enable the office
7 to better understand critical and changing customer-facing portal information and its affects
8 upon the regulated customer. This important utility process that directly "touches" the
9 regulated customer should be accessible to Missouri's consumer advocate and is aligned
10 with the statutory purpose of the Office of the Public Counsel.³

11 **Q. Do you have thoughts regarding how OPC's request for either existing or simulated**
12 **customer account access could be fulfilled while protecting customer privacy?**

13 A. Yes. I recommend the Companies evaluate the creation of simulated customer portal logins
14 for OPC or permit OPC to utilize some existing customer portals to provide it the ability
15 to observe and experience what Evergy customers experience as they are served by their
16 utility. This could be handled in one of two ways: 1) providing OPC with actual customer
17 accounts with the customer's name, address and other personally identifiable information
18 omitted or 2) providing OPC with simulated customer accounts with simulated usage, rate
19 plan(s), etc. I suggest once the Companies have an opportunity to consider OPC's
20 recommendation in this case and perform the evaluation that OPC is recommending, that
21 it and OPC engage in discussion to move forward in a cooperative manner to permit the
22 office to have such customer experience access.

23 **Q. Operationally, is the access you are proposing possible?**

24 A. It should be. The Companies have significant testimony in case nos. ER-2018-0145 and
25 ER-2018-0146 indicating the robust nature of its customer information system. My
26 understanding is that regulated Evergy ratepayers are paying at least \$118 Million for the

³ Mo. Rev. Stat. § 386.710 ("(2) He may represent and protect the interests of the public in any proceeding before or appeal from the public service commission;").

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1 system.⁴ Given the significant cost of Evergy's CIS system, it should be possible to provide
2 the Missouri consumer advocate full access to the important regulatory tool I have
3 proposed.

4 **Q. Other than the justification for such account access above are there other benefits to**
5 **Evergy, Evergy customers and OPC in having this type of CIS portal access?**

6 A. Yes. Such customer portal access for OPC creates a more open space of dialogue and
7 understanding between Evergy, regulated utility consumers, and the OPC regarding
8 important customer facing information and education. It also reduces the burden on the
9 Companies to periodically provide customer portal information to OPC upon its request
10 and may ultimately reduce the Companies' need to explain it. Such access will permit and
11 encourage a more efficient and streamlined understanding between OPC and each
12 Company of the customer engagement they have with their customers. Further, as utility
13 information available to customers has evolved over time in both increased volume and
14 sometimes increased complexity, this type of customer portal access will create an
15 environment of greater understanding of Evergy customer experience for OPC in its
16 consumer advocate role.

17 **Q. Has the OPC previously requested such customer portal access informally of Evergy?**

18 A. Yes.

19 **Q. Did the Company decline OPC's request for such access?**

20 A. Yes.

21 **Q. Do you know why the Company declined OPC's request for customer portal access?**

22 A. No, not at the time of this writing.

⁴ Lisa Kremer Rebuttal Testimonies, case nos. ER-2018-0145 and ER-2018-0146 Kansas City Power & Light Company and KCP&L Greater Missouri Operations, Pages 14, Line 18.

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1 **Q. Can you think of any reason a request of this nature would be of such concern by the**
2 **Company to deny it?**

3 A. No. Such access to the information customers are provided regarding their account is
4 logical for a consumer advocate to have. Further the Office of the Public Counsel is bound
5 by Missouri state statute regarding its treatment of confidential information should that
6 matter be a concern for the Company.⁵

7 **Q. Are you aware whether any Missouri Public Service Commission employee has access**
8 **to Evergy's customer portal information?**

9 A. Any Commission member, Advisor, or Staff currently served by Evergy would have access
10 to the customer portal information if they chose to. In conversation with the prior Manager
11 of the Commission's Consumer Services Unit, Ms. Gay Fred, it is my understanding that
12 she had, like OPC, requested access to the Company's CSI customer portal and had been
13 denied. In response, she had sought the willingness of Commission staff members served
14 by Evergy (KCPL at the time) to share specific customer screens, etc. when she had
15 inquiries. Presently, no OPC personnel are served by Evergy and as such do not have
16 account portal access.

17 **Q. If your recommendation were implemented, do you believe that the same or similar**
18 **treatment should be afforded to the Commission's Staff?**

19 A. Yes, if the Commission Staff wanted such access.

20 **Q. Do you believe the consumers the Office of the Public Counsel represents would**
21 **support OPC's request of the Company if they understood what the Office is asking**
22 **and why it is asking for CIS access?**

23 A. Yes. I have not surveyed Evergy customers as to the question, however, as a customer
24 served by three investor-owned utilities, I would have significant support for the Missouri

⁵ See Mo. Rev. Stat. 386.480-.

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1 consumer advocate to have access to the customer-facing portals I experienced as a
2 consumer of a regulated utility.

3 **Q. Is there anything further you would like to add on the topic of providing OPC access**
4 **to the Company's CIS system?**

5 A. Yes. In many ways I see this request as similar or parallel to other types of surveillance
6 regulatory bodies have interest in such as reports regarding the fuel adjustment clause,
7 reliability indices, call center metrics or others. CIS access for the OPC is akin to opening
8 the door to important customer-facing information to increase understanding, foster
9 transparency on behalf of the customer, and create productive dialogue regarding the
10 utility's engagement of its customers on topics of billing, messaging and education.

11 **REPORT: "AN EVALUATION OF ARIZONA PUBLIC SERVICE COMPANY'S**
12 **CUSTOMER EDUCATION AND ITS IMPLEMENTATION"**

13 **Q. Please explain what the above report is and why you are introducing it into your**
14 **Direct Testimony.**

15 A. The report referenced above is a report completed by a consultant on behalf of the Staff of
16 the Arizona Corporation Commission and is attached to my Direct Testimony as Schedule
17 3. The Arizona Staff contracted with Barbara Alexander Consulting LLC in response to
18 an Arizona Commission's order that "directed the Arizona Public Service Company
19 ("APS") to fund and implement a Customer Outreach and Education Program that was to
20 be developed and administered by the Commission's Utilities Division Staff." APS was
21 ordered by the Arizona Commission to make rate design changes for all non-solar
22 residential customers, transitioning them to one of five rate plans beginning in February
23 2018 through May 1, 2018. The Arizona "Staff was directed to hire, and APS was directed
24 to pay for, an independent consultant to complete this task."⁶

⁶ May 19, 2020, cover memorandum introducing the report entitled "An Evaluation of Arizona Public Service Company's Customer Education Plan And Its Implementation," prepared on behalf of the staff of the Arizona Corporation Commission; Rate Review Docket No. E-01345A-19-0003 and APS Rate Case Docket No. E-01345A-19-0236 Decision No. 77270, June 27, 2019, Arizona Corporation Commission.

1 Much can be gleaned from the report and the APS experience, providing considerations
2 regarding customer education for future Time of Use plans and other utility educational
3 efforts. The report compares the APS Customer Outreach and Education Program to the
4 California Marketing, Education, and Outreach (ME&O) plans developed by the California
5 investor-owned utilities to implement Time of Use rate mandates for residential customers.
6 The report is offered as critique of one investor-owned utilities' customer education
7 program that may provide useful information for Evergy as it continues its customer
8 education efforts on its various programs and offerings.

9 **Q. Are you introducing the report in criticism of Evergy's prior TOU educational efforts**
10 **regarding its pilot TOU program?**

11 A. No. There was stakeholder input and sharing of ideas in a variety of meetings before
12 Evergy's pilot TOU offering. The introduction of the current report is to offer educational
13 tenets, ideas, and information that might serve to benefit Evergy customers in the
14 Company's future customer educational efforts, including more expansive customer
15 adoption of TOU offerings. We learn as we go along and we learn from the experiences
16 of others. The Arizona report offers Evergy and all stakeholders an opportunity to be
17 introduced to additional educational experience toward improving and building upon the
18 Company's prior TOU customer education.

19 **Q. What were some findings of interest or considerations in the Arizona evaluation of**
20 **APS's Customer Education Plan?**

21 A. There were several areas that were insightful and I will provide a few of them here. The
22 report refers to the Marketing, Education, and Outreach plans developed by the California
23 Utilities as "best practices" as the California TOU experience was most closely aligned at
24 the time with that of Arizona Public Service Company. There were elements of contrast
25 between the APS Customer Education and Outreach Plan compared with the California
26 utility ME&O plans and as mentioned above those may provide useful information and
27 potentially inform future Marketing, Education, and Outreach plans developed in Missouri
28 as rate offerings evolve.

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1 Page 1 of the “Evaluation of Arizona Public Service Company’s Customer Education Plan
2 And Its Implementation” provides 13 bulleted topics which the report indicates were
3 included in the Table of Contents in the Southern California Edison Marketing, Education,
4 and Outreach plan (similar to those in effect for Pacific Gas & Electric and San Diego &
5 Electric) however most were found missing from the APS Plan. These items include the
6 following:

- 7 • ME&O Messaging Strategy (Marketing, Education, and Outreach)
- 8 • Current Market Overview
- 9 • Research Results and Implications/Challenges
- 10 • Risks and Barriers to Achieve Goals
- 11 • Specific Marketing Actions and Timeline
- 12 • Ongoing Research or Messaging, Customer Satisfaction, Awareness
- 13 • Marketing Objectives: Specific with Each Phase
- 14 • Target Audience and Segmentation: Customer Demographics; Low Income
15 Relationship to Solar Customers
- 16 • Specific Messages and Timing for All Outbound Communications
- 17 • New/Transfer Customer Engagement
- 18 • Partner and Community Based Organization Strategy
- 19 • Measurement and Metrics: Goals; Ongoing Tracking Surveys; Measurement
20 Plan; Accountability and Enforcement
- 21 • Budget

22 A key finding in the report was the apparent lack of consumer organization comments
23 being represented in the final version of the Arizona Public Service Company’s Plan which
24 may have been contributed to, by what appears to be, a short ten day comment period
25 before the final ME&O was filed.⁷ Also noted were messages that focused on “saving” on
26 a plan but the calculations were “not based on promises of saving on lower future electricity
27 rates by reducing peak or demand usage.” Likewise, messages of savings were not based

⁷ Report “An Evaluation of Arizona Public Service Company’s Customer Education Plan And Its Implementation,” May 19, 2020, page 2.

1 on comparing the customer's new plan with customer's old plan but rather comparing the
2 customer's current usage and profile to each of the new rate plans.⁸

3 Other areas of noted deficiency in the APS plan was the failure to identify risks and barriers
4 to the intended goals and objectives of the APS plan which included a short time period for
5 education, no significant change in bill presentation (especially for demand charges), and
6 a lack of bill protections or exemptions for low income customers or those with special
7 needs.⁹ Other concerns included insufficient performance tracking and the lack of the APS
8 Customer Education Plan to conform to best practices that the report referred to as:
9 "essential components of a reasonable customer education plan or program given the
10 monumental task that the Company stated it could achieve."

11 The report presented eight "key defects or omissions" to the APS Customer Education Plan
12 including the plan's lack of metrics to measure achievement of stated goals and objectives
13 in the Customer Education Plan; the plan's lack of objectives or goals that measured
14 customer behavior as a result of communications including whether customers were
15 actually put on the 'best' plan for them; lack of research regarding customer comprehension
16 or understanding of messaging about new rate plans; and a lack of information regarding
17 customer demographic characteristics in the Company's service territory including housing
18 patterns, family size, educational achievement, literacy, income, and employment. Also
19 observed was that the plan did not specifically identify the special needs of low income
20 and fixed income customers or develop specific communication channels and messaging
21 for these customers. This later finding may highlight the differences between oral and print
22 culture, communication and learning styles explained more fully in the book, "See Poverty
23 . . . Be The Difference"¹⁰ which addresses, among other things, effective communication
24 methods with people living in poverty in an effort to better serve them.

25 **Q. What other aspects of the report were striking?**

26 A. The recommendation that the utility Customer Education Plan should be comprehensive in
27 nature, "concerning not only rate design options but integrate its rate design education with

⁸ *Id.*

⁹ *Id.* at page 3.

¹⁰ "See Poverty, Be The Difference," Dr. Donna M. Beegle, Copywrite 2007, pp. 97 -107.

1 its limited income programs, demand side management programs and consumer protection
2 rights and remedies to ensure the retention of electricity service.”¹¹ The report
3 recommended the Commission order APS to create and propose “such a comprehensive
4 Customer Education Plan to allow APS to develop customer educational materials and
5 outreach strategies in a coordinated manner for its residential customers.”

6 The report went on to say: “As a key requirement, the Commission should require the Plan
7 to include performance standards and reporting mechanisms that will allow a meaningful
8 and regular review of APS progress in implementing the plan and achieving its goals and
9 objectives. The ongoing reliance on counting customer communication “touchpoints” in
10 all of the APS outreach programs is not a proper means of developing or evaluating a
11 customer education plan. Performance standards should include, at a minimum, measuring
12 and reporting on:

- 13 • Customer initiated changes to their rate plans;
- 14 • APS initiated changes to customer rate plans;
- 15 • Number of customers not on the “best” or “most economical rate” by rate class;
- 16 • Frequency and type of complaints;
- 17 • Call center performance;
- 18 • Results of customer research on messaging and bill presentment;
- 19 • Enrollment for limited income programs;
- 20 • Achievement of participation objectives for demand side management
21 programs;
- 22 • An evaluation of how the rate plans have resulted in system wide benefits, such
23 as lowering peak energy usage and reducing generation supply costs; and
- 24 • Key indicia of credit and collection activities, such as disconnection notices,
25 disconnections, and payment arrangements.”

¹¹ Report “An Evaluation of Arizona Public Service Company’ Customer Education Plan And Its Implementation,” May 19, 2020, page 8.

**IMPORTANCE OF TRANSPARENCY, DEFINED TERMINOLOGY AND AVOIDED
USE OF ACRONYMS ON CUSTOMER BILLS**

Q. Why is it important for utility bills to be transparent, provide defined terminology, and avoid the use of acronyms?

A. Customer understanding, to all extent possible, of the specific charges that comprise their regulated energy bill is a primary and reasonable customer right and expectation. As the number of line items on utility bills have increased over time, it is important to highlight the need for bill clarity and transparency, including not only avoiding acronyms on individual bill line items but providing definitions in customer message sections of bills or in other places on the bill to the extent possible.

Q. Can you provide specific examples?

A. Yes. Current Evergy bills provide charges for the Fuel Adjustment Charge (“FAC”), Renewable Energy Standard Rate Adjustment (“RESRAM”), and Demand Side Investment Mechanism (“DSIM”) that are presented as acronyms on the line items. As a result of Evergy’s prior rate cases (Case Nos. ER-2018-0145 and ER-2018-0146) the Company committed to Staff, OPC and the Missouri Division of Energy to provide customers with an annual bill insert that provides the spelling of the acronyms and definitions. This bill insert was a positive step and OPC appreciates this effort on Evergy’s part, however, additional opportunities may exist, given the CIS system investments, to spell acronyms out on the line where they appear on the bill and next to their corresponding charge. These acronyms represent charges that are highly technical in nature and full spelling of the charge names may provide customers a clearer sense as to what the items represent. OPC encourages the Company to continually revisit such opportunities to provide as transparent of bills as are possible including at times when system revisions may be made to more fully explore this customer serving and customer sensitive need.

Below is the section of an Evergy (Metro) residential customer bill that demonstrates the use of such acronyms:

Billing Details - service from 01/06/2022 to 02/06/2022

Customer Chg

Energy Chg 600.0000 kWh at \$0.09888 per kWh

Energy Chg 400.0000 kWh at \$0.078 per kWh

Energy Chg 140.7410 kWh at \$0.078 per kWh

DSIM Chg 01-07-2022-02-06-2022 for 1,140.7410 kWh at \$0.0063 per kWh

FAC Chg 01-07-2022-02-06-2022 for 1,140.7410 kWh at \$0.00194 per kWh

RESRAM Chg 01-07-2022-02-06-2022 for 1,140.7410 kWh at \$0.00089 per kWh

Subtotal

Raytown Franchise Fee

Raytown City Sales Tax @ 2%

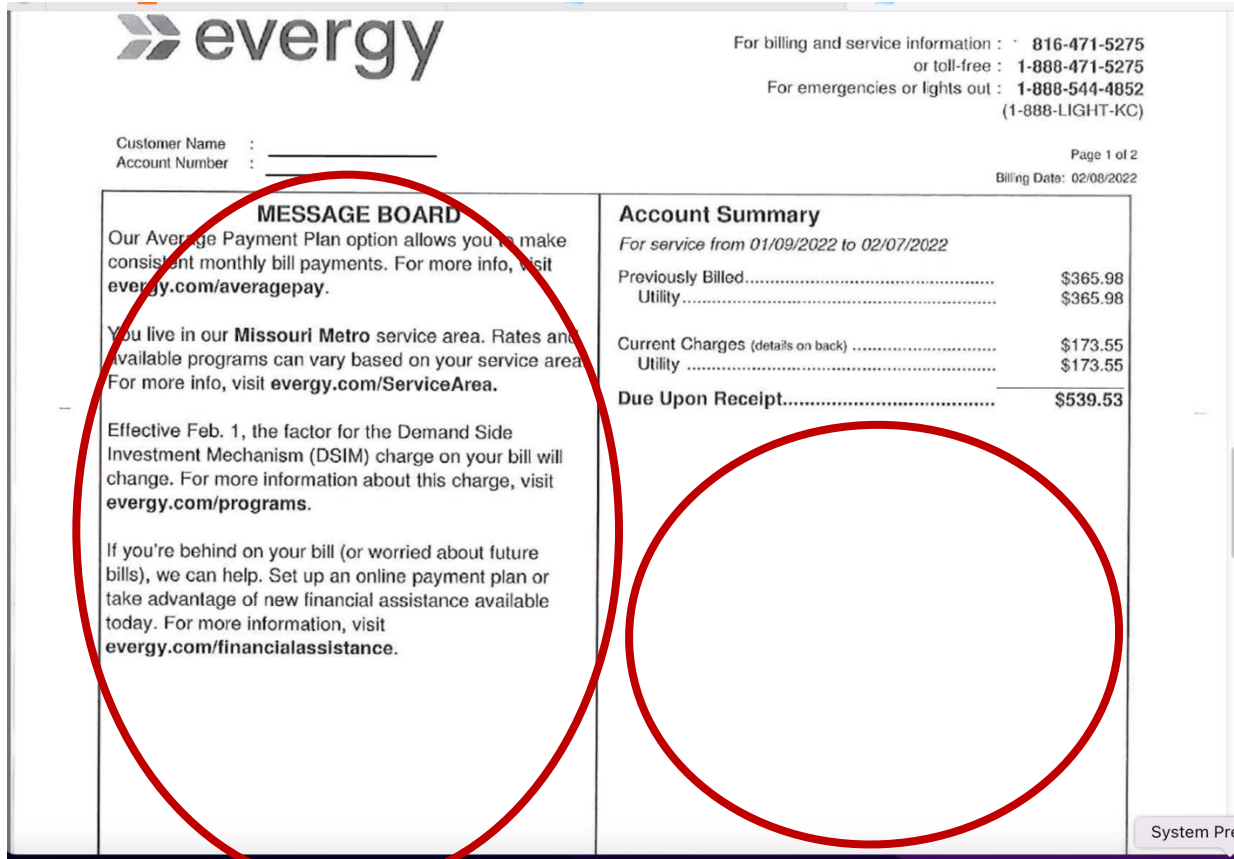
Current Charges

1 **Q. Does there appear to be an opportunity to provide definitions of the acronyms**
2 **described above somewhere on the bill?**

3 A. Yes, I believe so. In viewing the Message Board on Evergy's bill it appears to provide an
4 opportunity for key acronym definitions to be provided for the customer as well as provide
5 a link to the Company's website for definitions, the latter of which the Company does. As
6 mentioned above, the purpose of the Message Board as stated on the Company's website
7 is: "the message board provides helpful and timely information about your rates,
8 special programs, electrical safety, energy efficiency and payment options."¹²

9 OPC recognizes that depending upon other information the Company may present on the
10 Message Board, which may change from one billing period to the next, space may be
11 unavailable to provide specific bill line-item definitions each month. However, I
12 recommend the Company review such bill definition opportunities that may exist even if
13 specific bill charge definitions cannot be presented monthly. Further, there is considerable
14 white space below the Account Summary that might also be evaluated to provide
15 definitions. Samples of the Message Board and Account Summary bill sections are
16 presented below:

¹² Evergy's Website www.evergy.com Section: Understanding My Bill.



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Customers are paying for the Companies' billing system, bill preparation and bill delivery as well as being responsible for all charges presented on their bills. They are entitled, to the fullest extent possible, to understand what each charge presented on their bill is. The Company's commitment and execution of, at a minimum, an annual bill insert to include descriptions of the FAC, RESRAM, and DSIM is recognized and appreciated, but OPC believes customers would benefit from more frequent and consistent bill detail information.

Q. Did the Company provide complete bill samples in this case?

A. Yes. The Company provided numerous bill samples for both Evergy West and Evergy Metro. Residential bill samples for each company are attached as Schedule 4 to my Direct Testimony. The first page of each bill presents the Message Board I referred to above and the Account Summary section. The second bill page presents an energy usage graph and "Billing Details" as identified above.

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Lisa Kremer

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1 **Q. Please summarize your recommendations in this case.**

2 A. 1. That Evergy work with the Missouri Office of the Public Counsel to provide the
3 OPC with anonymous or simulated CIS customer account access.

4 2. That Evergy review the report, “An Evaluation of Arizona Public Service
5 Company’s Customer Education And Its Implementation” for its applicability toward
6 enhancing Evergy’s customer education efforts presently and in the future.

7 3. That Evergy seek to provide as much bill clarity as possible by spelling out
8 technical acronyms on customer bills and avoiding their use for terms such as: Fuel
9 Adjustment Charge, Renewable Energy Standard Rate Adjustment, Demand Side
10 Investment Mechanism, etc. Further, that Evergy seek opportunities to provide definitions
11 of the above terms directly on customer bills in space available.

12 **Q. Does this conclude your testimony?**

13 A. Yes.