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

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In the Matter of the Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro for Approval of Tariff Revisions

File No. ET-2021-\_\_\_\_

# APPLICATION FOR APPROVAL OF TARIFF REVISIONS, REQUEST FOR WAIVER OF 60 DAY NOTICE REQUIREMENT <u>AND MOTION FOR EXPEDITED TREATMENT</u>

COMES NOW Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("Evergy Missouri Metro" or the "Company") and files this *Application for Approval of Tariff Revision* ("Application"), *Request for Waiver of 60 Day Notice Requirement and Motion for Expedited Treatment* ("Motion"). In support of its Application and Motion, the Company states:

1. Evergy Missouri Metro is a Missouri corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. The Company is primarily engaged in the business of generating, transmitting, distributing, and selling electric energy in portions of eastern Kansas and western Missouri. The Company is an electric corporation and public utility as defined in Section 386.020 Mo. Rev. Stat. (2000), as amended.

2. A Certificate of Good Standing was filed with the Commission in Case No. EN-2020-0063 and is incorporated herein by reference in accordance with 20 CSR 4240-2.060(1)(G).

3. In addition to the undersigned counsel, all correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

Darrin R. Ives Vice President – Regulatory Affairs Evergy, Inc. 1200 Main Street P.O. Box 418679 Kansas City, MO 64141-9679 (816) 556-2522 Darrin.Ives@evergy.com Anthony R. Westenkirchner Senior Paralegal – Regulatory Affairs Evergy, Inc. 1200 Main Street, 16<sup>th</sup> floor Kansas City, MO 64105 (816) 556-2668 <u>Anthony.Westenkirchner@evergy.com</u>

3. Evergy Missouri Metro does not have any pending actions or final unsatisfied judgments or decisions against them from any state or federal agency or court, which involve customer service or rates, which action, judgment, or decision has occurred within three years of the date of the Application, except for:

- (i) Docket No. EC-2020-0079, Russ Coleman v. Evergy Missouri Metro
- (ii) Docket No. EC-2021-0084, Grand Property Management KC and Rachael Staude, v. Evergy Missouri Metro

4. Evergy Missouri Metro is a wholly owned subsidiaries of Evergy, Inc. Evergy Missouri Metro have no annual reports or regulatory assessment fees that are overdue in Missouri.

5. The Company is undertaking its Customer Forward Program in order to integrate and consolidate its operating companies' customer service systems. The goal of the Customer Forward Program is to integrate customer systems in order to create efficiencies and create a seamless and improved experience for customers and employees. As part of the Program's implementation, the Company is updating a few of its existing tariffs as explained below.

6. As part of the Customer Forward Program, Evergy Missouri Metro is requesting to align the non-residential deposit process with the process used by Evergy Missouri West. Non-residential deposits will not exceed two times the highest bill for utility charges actually incurred or estimated to be incurred by the customer during the most proximate twelve-month period. This request affects tariff sheet number 1.09A (see attached exemplar tariff in **Exhibit A**).

7. As part of the Customer Forward Program, Evergy Missouri Metro is requesting permission to add additional language to better explain the estimation process found in section 6.06 (A) & (B) of the tariff. Although no change is being made to the previously approved estimation process, it was determined during a review that adding additional language would more accurately describe the existing process. This request affects tariff sheet number 1.23 (see attached exemplar tariff in **Exhibit A**).

8. Also as part of the Customer Forward Program, Evergy Missouri Metro is asking the Commission to allow non-residential customers the ability to pay with an approved credit or debit card by incurring a third-party vendor transaction fee. The fee is currently set at 2.7% and is charged by and paid to the 3<sup>rd</sup> party vendor processing the commercial card payment. Evergy Missouri Metro does not receive any part of this fee. The commercial customers choosing to pay with a credit or debit card bear the entire cost associated with that payment type. This is an optional payment type for non-residential customers and does not impact Evergy Missouri Metro rates. No changes are being made to the residential credit or debit card payment process. This request affects tariff sheet number 1.26 (see attached exemplar tariff in **Exhibit A**).

9. The Company has worked with the Staff of the Commission on the above changes to the tariffs.

10. No other public utility will be affected by the approval of these tariff revisions.

11. 20 CSR 4240-4.017(1) states in part:

(1) Any person that intends to file a case shall file a notice with the secretary of the commission a minimum of sixty (60) days prior to filing such case. Such notice shall detail the type of case and issues likely to be before the commission and shall include a summary of all communication regarding substantive issues likely to be in the case between the filing party and the office of the commission that occurred in the ninety (90) days prior to filing the notice.

The Company seeks a waiver of this rule requirement. Good cause exists, pursuant to 20 CSR 4240-4.017(1)(D), to grant a waiver of 20 CSR 4240-4.017(1), because the existence of the 60 day notice period will not permit the Company to meet its November testing deadline for changes related to the January 18, 2021 implementation of the Customer Forward Program "go-live" date. As set forth in the attached verification, the Company has no communication with the office of the Commission within the prior 150 days regarding any substantive issue likely to be in the case.

### MOTION FOR EXPEDITED TREATMENT

12. Pursuant to 20 CSR 4240-2.080(14), the Company requests a Commission order approving this application by November 11, 2020 in order to meet its deadline for testing of changes to its customer systems related to the Customer Forward Program which is scheduled to be operational on January 18, 2021. In order to meet this 2021 implementation date, testing of expected changes needs to be completed several months in advance of the go-live date. Should the Commission approve the tariff changes outlined in this Application, the Company will then file compliance tariffs which coincide with the January 2021 "go-live" date. Thus, good cause exists for a November 11, 2020 order date.

13. There will be no negative effect on the Company's customers or the general public if the Commission acts by this date.

14. This Motion was filed as soon as it could have been under the circumstances..

WHEREFORE, Evergy Missouri Metro respectfully request that the Commission issue an order granting the request herein.

Respectfully submitted,

# <u>|s| Roger W. Steiner</u>

Robert J. Hack, #36496 Roger W. Steiner, #39586 Evergy, Inc. 1200 Main Street, 16<sup>th</sup> Floor Kansas City, MO 64105 Phone: (816) 556-2791 Phone: (816) 556-2314 Fax: (816) 556-2787 rob.hack@evergy.com roger.steiner@evergy.com

# ATTORNEYS FOR EVERGY MISSOURI METRO

## **VERIFICATION**

STATE OF MISSOURI ) ) COUNTY OF JACKSON )

SS

Darrin Ives, being first duly sworn, on his oath and in his capacity as Vice President – Regulatory Affairs of Evergy, Inc., states that he is authorized to execute this Application on behalf of Evergy Missouri Metro, and has knowledge of the matters stated in this Application, that said matters are true and correct to the best of his knowledge, information and belief, and that Evergy Missouri Metro has had no communication with the Office of the Commission within the prior 150 days regarding any substantive issues likely to arise in this case.

Darrin Ives

Subscribed and sworn to before me this 8<sup>th</sup> day of October 2020. Notary Public My Commission Expires: ANTHONY **R WESTENKIRCHNER** 26/2021 Notary Public, Notary Seat ate of Missour Inite C ounty Commission # 17279952 My Commission Expires April 26, 2021

# **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been emailed to the Office of the General Counsel and the Office of the Public Counsel this 8<sup>th</sup> day of October 2020.

Roger W. Steiner

Roger W. Steiner

## EVERGY METRO, INC. d/b/a EVERGY MISSOURI METRO

P.S.C. MO. No.	2	Fourth		Original	Sheet No.	1.09A
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## GENERAL RULES AND REGULATIONS APPLYING TO ELECTRIC SERVICE

2. SERVICE AGREEMENTS (continued)

# 2.07 CREDIT REGULATIONS: (Continued)

(C) No deposit shall be required by the Company because of a customer's race, sex, creed, national origin, marital status, age, number of dependents, source of income, disability or geographical location.

(D) A security deposit required pursuant to these Rules and Regulations is subject to the following terms and conditions:

1) For residential customers, a security deposit shall not exceed two (2) times the highest bill of that customer during the preceding twelve (12) months. In the case of a new customer who is billed a deposit under the terms of 4 CSR 240-13.030 (1)(c) the deposit shall not exceed one-sixth (1/6) of the estimated annual bill of the customer. For non-residential customers, a security deposit shall not exceed two (2) times the highest bill for utility charges actually incurred or estimated to be incurred by the customer during the most proximate twelve (12) month period at the service location.

2) Interest on deposits shall be paid at a per annum rate equal to the prime bank lending rate plus one percentage point as published in <u>The Wall Street Journal</u> for the first business day of December of the preceding calendar year, compounded annually.

(E) Deposit refunds - The credit of the residential customer will be established and the deposit and accrued interest, if any, will be refunded or the guarantor released, upon satisfactory payment before the delinquency date of all proper charges for service for a period of twelve (12) consecutive months, or if the customer has closed the account. The credit of the nonresidential customer will be reviewed after thirty-six (36) consecutive months of satisfactory payment before the delinquency date and the deposit refunded or the guarantor released if, in the opinion of the Company, the customer has established satisfactory credit in accordance with Section (A) of this Rule. If, after thirty-six (36) consecutive has not established satisfactory credit in accordance with Section (A), then such customer's

# EVERGY METRO, INC. d/b/a EVERGY MISSOURI METRO

P.S.C. MO. No.	2	Nineth	Revised	Sheet No.	1.23
Cancelling P.S.C. MO. No.	2	Eighth	Revised	Sheet No.	1.23

For Missouri Retail Service Area

## GENERAL RULES AND REGULATIONS APPLYING TO ELECTRIC SERVICE

#### 6. **METERING** (continued)

6.05 METER SEALS: Seals will be placed by the Company on all meters and meter enclosures. Such seals shall not be broken or disturbed by any person other than persons authorized by the Company or by law.

6.06 ESTIMATED BILLING DUE TO UNREAD METERS: If, due to circumstances or conditions beyond the control of the Company or if it is otherwise impractical for the Company to read the meter on a scheduled meter reading day, the Company may, at its discretion, deliver to the premises of the Customer a business reply card with instructions thereon as to how the Customer shall read the meter and mail the information to the Company. In any event, if no meter reading is obtained in time for billing as scheduled, then subject to 4 C.S.R. 240-13.020, the Company shall render an "estimated bill" based on usage as estimated by the Company. Estimated bills shall be adjusted in the next subsequent billing based upon a reading of the meter by the Company.

ESTIMATED BILL PROCEDURE:

- A. For Customers with Advanced Metering Infrastructure (AMI) meters, when a current meter read is unavailable, the Meter Data Management (MDM) system will average consumption from the last read plus three-prior days to estimate the daily meter read. If the daily meter reads from the three prior days are not available, a second estimation attempt will be made. In the second attempt the MDM system will average the usage from five historical reads from the previous year. It will average the usage from the read in the prior year from a comparable date as being estimated along with the three days prior and one day after. If the second estimation attempt is not successful, then the process to estimate the daily meter read will be a manual process. The Company will estimate the daily meter read based on historical usage information from the same premise and if not available, the usage of Customers with like premises.
- B. For Customers with non-AMI meters, when a current meter read is unavailable, the MDM system will average the usage from the prior year in the same billing month, the usage 35 days before and the usage 35 days after that month. If that information is not available, a second read estimation attempt will be made by averaging the usage from the prior two readings. If the second estimation attempt is not successful, then the estimation is a manual process. The Company will estimate usage based on historical usage information from the same premise and if not available, the usage of Customers with like premises.

6.07 ACCURACY AND TESTS: The accuracy and testing of the Company's meters shall be in accordance with the general orders of the Commission applying thereto.

6.08 EVIDENCE OF CONSUMPTION: The registration of the Company's meters will be accepted and received at all times and places as prima facie evidence of the amount of power and energy taken by the Company.

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			For Missouri Retail Ser	vice Area
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## **BILLING AND PAYMENT**

8.01 BILLING PERIOD: Normally, the Company will read the Customer's meter monthly and bills based on such monthly readings will be rendered at intervals of approximately one month. For all customers the billing period shall normally be not less than 26 nor more than 35 days. The Company shall have the right to read meters and render bills more frequently. If bills are rendered more frequently than monthly, the total of the minimums of such bills for any one month shall not exceed the monthly minimum required under the applicable rate schedule. For all customers if a bill is rendered for less than 26 or more than 35 days the bill may be prorated.

8.02 PAYMENT OF BILLS: A bill for electric service supplied by the Company shall, upon rendition (by mailing, electronic posting or serving), become due and payable in the net amount thereof. Bills for electric service may be paid in cash, check or by approved credit and debit cards. Non-residential customers paying by approved credit or debit card are subject to per transaction limits and fees by the third party processor.

- (A) Any unpaid bill for service under a rate schedule classified as "<u>Residential Service,</u>" shall become delinquent on the twenty-second (22nd) day after rendition. The Company may add a sum equal to two percent (2%) on the first \$50.00 and one percent (1%) on the remainder of the net amount of such bill, and the Customer shall then pay the gross amount of such bill if delinquent.
- (B) Any unpaid bill for service under any other rate schedule shall become delinquent on the fifteenth (15th day) after rendition; provided, however, that bills for service rendered to the State of Missouri and its agencies shall not become delinquent until thirty days (30 days) after rendition. The Company may add a sum equal to five percent (5%) on the first \$50.00 and one percent (1%) on the remainder of the net amount of such bill, and the Customer shall then pay the gross amount of such bill if delinquent.
- (C) Interest at the rate of six percent (6%) per annum on the net amount of such bill may be added to any unpaid bill commencing thirty days (30 days) after it becomes delinquent.

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Exhibit A Page 4 of 6

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#### For Missouri Retail Service Area

#### GENERAL RULES AND REGULATIONS APPLYING TO ELECTRIC SERVICE

6. METERING (continued)

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6.08 EVIDENCE OF CONSUMPTION: The registration of the Company's meters will be accepted and received at all times and places as prima facie evidence of the amount of power and energy taken by the Company.

DATE OF ISSUE: ISSUED BY:

Darrin R. Ives, Vice President

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