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Surrebuttal Testimony of Randall T. Jennings
Case No. ER-2026-0143

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MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

SURREBUTTAL TESTIMONY

OF

RANDALL JENNINGS

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

CASE NO. ER-2026-0143

Jefferson City, Missouri
September 2026

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SURREBUTTAL TESTIMONY

OF

RANDALL JENNINGS

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

CASE NO. ER-2026-0143

Q. Please state your name and business address.

A. My name is Randall Jennings, 200 Madison Street, Jefferson City, Missouri 65101.

Q. By whom are you employed and in what capacity?

A. I am employed by the Missouri Public Service Commission ("Commission") as a Senior Research and Data Analyst for the Tariff/Rate Design Department, in the Industry Analysis Division.

Q. Are you the same Randall Jennings that previously filed testimony in this case including Direct Testimony on June 30, 2026 and Rebuttal Testimony on August 11, 2026?

A. Yes.

Q. What is the purpose of your surrebuttal testimony?

A. The purpose of my surrebuttal testimony is to respond to comments from Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("EMM") witness Julie Dragoo's Rebuttal Testimony.

My surrebuttal testimony addresses EMM's use of estimated interval data in customer billing and responds to EMM's contention that its aggregate billing results

demonstrate that its present processes are adequate. Staff does not contend that EMM intentionally issues inaccurate bills. The issue is whether EMM's present thresholds and controls adequately identify, review, and correct billing inaccuracies and provide sufficient transparency for Commission oversight.

ESTIMATED BILLS AND BILL CORRECTIONS

Q. Have you reviewed the rebuttal testimony of EMM witness Julie Dragoo?

A. Yes. Ms. Dragoo stated that "Evergy already maintains substantial meter and interval data, including information identifying estimated meter reads."[1] Ms. Dragoo further maintains "[t]he data in my testimony proves that estimated billing impacts only a very small percentage of customer bills"[2] and that "it is important to evaluate Staff's concerns in the context of EMM's overall billing performance and actual experience of its customers."[3]

Q. Did Ms. Dragoo provide the number of bills that were estimated?

A. No. Ms. Dragoo did not provide an exact number but stated that "0.07% of customer bills were identified as estimated"[4] and that "[s]aid differently, more than 99% of Evergy customers' bills were not estimated."[5]

Q. How does EMM define or identify a bill as being "estimated"?

[1] Julie Dragoo Rebuttal Testimony, Page 4, Lines 6-7.
[2] Julie Dragoo Rebuttal Testimony, Page 4, Lines 7-9.
[3] Julie Dragoo Rebuttal Testimony, Page 3, Lines 6-7.
[4] Julie Dragoo Rebuttal Testimony, Page 5, Line 3.
[5] Julie Dragoo Rebuttal Testimony, Page 5, Lines 4-5.

A. "At the time of billing the system will evaluate the number of estimated intervals for the billing period, and if that equals 33% or more the bill will be flagged as estimated."[6]

Q. Does Staff agree with EMM's definition of an estimated bill?

A. No. Customer bills containing any estimated intervals could be interpreted as being "estimated." Staff does not object to a threshold or metric being used to identify a customer's bill as being estimated but that threshold or metric for review and adjustment should be more closely aligned with the processes in use by Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri").

Q. How does EMM's process of identifying a customer bill as "estimated" differ from that of Ameren Missouri?

A. As stated earlier, EMM identifies a customer bill as "estimated" if 33% or more of a billing period's data intervals contain estimated data. Ameren Missouri identifies a customer's bill as "estimated" when more than 1% of the interval data for the billing period is estimated.[7]

Q. Does EMM have a process to compare the estimated data inserted by the billing system to known actual meter readings?

A. Yes. EMM conducts a "sum check" to determine if the sum of the intervals in a customer's billing period varies from the scalar usage, or amount between known

[6] Company response to Staff Data Request 0219.
[7] Case ER-2026-0291, Company response to Staff Data Request 0246.

actual meter reads. If this variance is ±33 kWh or greater, EMM will perform a manual review of the data.

Q. When a variance is ±33 kWh or greater, how does EMM adjust the customer's bill?

A. As Staff showed in rebuttal testimony, once EMM has determined the percentage of difference between the actual meter reads and the sum of the intervals, each interval's usage is adjusted (increased or decreased as necessary) by that percentage regardless of which intervals were estimated.

Q. Does this differ from the process in use by Ameren Missouri?

A. Yes. Ameren Missouri stated that it conducts daily validations to compare the sum of the interval readings to the difference between the applicable register readings. If the variance exceeds ±4 kWh, the account is flagged for manual review and validation.[8]

Q. Did Staff ask how many "sum check" reviews EMM has conducted?

A. Yes. Between October of 2024 and June 15, 2026, EMM conducted 15,365 of these reviews.[9] As a result of the reviews, EMM took each customer bill and adjusted all intervals within the billing period accordingly so that the sum of the intervals equaled the scalar usage for the period in question.[10] Staff requested a list of the reviews conducted but was told EMM does not track this detail.[11] As a result, EMM has not

[8] Case ER-2026-0291, Company response to Staff Data Request 0245.
[9] Company response to Staff Data Request 0219.3.
[10] Company response to Staff Data Request 0219.3.
[11] Company response to Staff Data Request 0219.3.

provided the customers, customer rate class, adjusted usage amounts, nor the rates associated with the 15,365 reviews conducted.

Q. Why is this information important?

A. This information could indicate whether specific rate classes are being affected more than others, the degree of impact from the adjustments made by EMM, potential locational issues with communication equipment, and depending on the date and/or time of the intervals being estimated, the impact of EMM's process of adjusting all intervals within the billing period versus adjusting only the intervals estimated.

Also, without access to EMM's interval data, Staff cannot determine a count of EMM customer bills whose sum of intervals were up to ±32 kWh different from its scalar usage but not counted in the "sum check" reviews conducted by EMM. As Staff has shown in its Rebuttal testimony, customer bills with sum checks of ±32 kWh or less could have their bills affected without notice to either EMM or the Customer. Having access to the interval data could give a clearer picture of the impact of these adjustments.

Q. Does Ms. Dragoo relate the percentage of "estimated" bills to the effectiveness of EMM's billing processes?

A. Yes. Ms. Dragoo states "[t]he Company's processes successfully obtain and validate billions of interval reads annually, apply estimation only when necessary, perform automated and manual validation checks and still issue more than 99.5% of bills on schedule."[12] In rebuttal testimony, Staff addressed the potential pitfalls of EMM's

[12] Julie Dragoo's Rebuttal Testimony, Page 5, Lines 8-11.

estimation process, the number of customer bills that may be estimated without notice to the customer, and the worst-case scenario dollar impact of those estimations. Whether or not a bill is issued timely is a separate issue from whether or not the usage on that bill is correct.

Q. Does Ms. Dragoo provide a number of interval reads that require estimation?

A. Yes. Ms. Dragoo stated that "[o]n an average day, only approximately 0.62% of interval reads require estimation. This indicates that interval estimation is typically not occurring broadly across the meter population."[13]

Q. Does Staff disagree with Ms. Dragoo's statement?

A. Without access to EMM's data, Staff can neither confirm nor refute Ms. Dragoo's specific percentage and statement. Further, EMM's response to Staff data request 0219.2 indicated that "[t]he Company does not maintain this detail nor is it readily available for query." If EMM does not maintain this detail or have it available for query, Ms. Dragoo's statement is unconfirmed.

Q. Has Staff has asked EMM what format this detail is maintained in the due course of business?

A. Yes. EMM's Meter Data Management ("MDM") system is a living database and therefore does not generate a document or a formatted report.[14] EMM also maintains operational dashboards and summary metrics used to monitor system performance,

[13] Julie Dragoo's Rebuttal Testimony, Page 5, Lines 20-22.
[14] Company response to Staff Data Request 0502.

including aggregate measurements such as the total number of interval readings processed and the percentage of those intervals that are estimated but those records do not tie back to bill specific details and are an aggregation of measurement data in total.[15]

Q. Has Staff asked EMM what steps it has taken, or can take, to make the data accessible to Staff?

A. Yes. EMM stated it does not maintain a report that links estimated interval readings to individual customer bills and EMM's analysis does not produce the bill-specific information requested by Staff. "Producing such information would require the development of a customized extraction and reconciliation process across multiple systems to identify estimated intervals and determine whether, and to what extent, those intervals contributed to a particular bill."[16] If Staff had access to this data, Staff could examine the intervals affected and attempt to determine whether the correct rates are being applied to customers that include differentials for time of use.

Q. Did Ms. Dragoo offer any data to support her average daily estimate value?

A. No. The data provided was only a monthly listing of the total intervals, and the numbers of regular, estimated and missing interval readings.[17]

Q. Ms. Dragoo argues that billing impact does not justify the manual review. Does Staff agree?

A. No. Ms. Dragoo described how EMM analyzed the manual effort required to investigate and resolve sum check exceptions and compared that effort to the potential

[15] Company response to Staff Data Request 0502.
[16] Company response to Staff Data Request 0502.
[17] Company response to Staff Data Request 0503.

billing impact of small variances.[18] EMM's conclusion was to change the threshold from ±18 kWh to ±33 kWh per billing period. She stated "[t]his change was made solely to better align the cost of manual review with the corresponding billing impact, (variances within ±33 kWh generally carry a lower potential bill impact than the labor cost required to investigate and resolve them), and was not the result of any concern regarding meter accuracy or billing system performance." As outlined in Staff's rebuttal testimony, the possible impact to a single customer's monthly bill could be significant from the customer's perspective depending on the customer's current financial circumstances.

Staff also outlined in rebuttal testimony how EMM's process differs from Union Electric Company, d/b/a Ameren Missouri and how Ameren Missouri conducts manual reviews and adjustments at a much more granular level.

Q. Did the Commission approve EMM's threshold change for manual intervention?

A. No. The threshold value is not included in EMM's currently effective tariff. EMM established the initial threshold and later changed that value; both without Commission approval.

Staff proposed in rebuttal testimony that EMM file an application for Commission approval, a tariff that addresses interval estimation procedures including testimony and analysis that justifies the process including thresholds for automated and manual

[18] Julie Dragoo Rebuttal Testimony, Page 7, Lines 5-7.

estimations, thresholds for identifying customer bills that include estimated intervals, and potential bill revision processes.

Q. Does Ms. Dragoo address the accuracy of the bills as it relates to its customer experience?

A. Yes. Ms. Dragoo correlates a lack of customer complaints with the accuracy of EMM's billing process by stating "[t]he absence of justified formal complaints and the minimum level of informal complaints over the three-year period strongly suggests that customers are not experiencing the types of problems implied by Staff's testimony."[19] Ms. Dragoo adds that "while estimations have improved over the years with the implementation of new technology and AMI meters/networks, no estimation is perfect. That is why we still identify, measure and communicate to customers when their bill is based on estimated reads."[20] Staff maintains, as described in previous rounds of testimony, that Customers could have bills with up to 32% of its billing period intervals containing estimated usage and/or the sum of its billing period intervals differ from actual meter readings by up to ±32 kWh with no notice provided by EMM. Without notice that one or both of these company policies are in effect for a billing period, customers most likely trust that their bill is accurate and pay the amount due without question. A customer informed of either of these situations might look at their bills more closely and question the determinants more frequently.

[19] Julie Dragoo Rebuttal Testimony, Page 8, Lines 11-14.
[20] Julie Dragoo Rebuttal Testimony, Page 8, Lines 17-20.

Q. If a customer bill contains estimated data, does that necessarily mean EMM will later correct the bill?

A. No. Ms. Dragoo stated "No. Whether a correction occurs depends on the availability of updated meter data and whether that updated information creates a meaningful difference in the customer's bill."[21] Staff proposes that updated information should be reflected in a customer's bill. A threshold or metric for review and adjustment more closely aligned with the processes in use by Ameren Missouri could help ensure better billing determinant accuracy for all customers.

Q. Ms. Dragoo gives "actual customer outcomes produced by Evergy's billing systems."[22] Does Staff agree with these analyses?

A. No. Again, Staff has not been provided the data supporting Ms. Dragoo's conclusions. Taking her statements at face value, 0.62% of interval meter reads are estimated on an average day. That equates to 186,000 estimated intervals each day of the year. Without access to the supporting data, Staff cannot determine which rate classes are affected and to what extent. Having this data could help Staff determine whether this is a uniform problem across all customer rate classes, or if it applies more often to a small number of customers in a certain rate class or in a certain geographic area. Staff cannot determine which is occurring because EMM has not provided data for analysis. Customers typically do not file complaints or request billing corrections if they are unaware of potential problems with the data intervals used to calculate their bills.

[21] Julie Dragoo Rebuttal Testimony, Page 10, Lines 3-4.
[22] Julie Dragoo Rebuttal Testimony, Page 10, Lines 14-17.

CONCLUSION

Q. When Staff previously requested data regarding estimated interval data what was EMM's response?

A. EMM has repeatedly stated that it does not maintain or track this detail nor is it readily available for query and/or that the meter data management system doesn't have the information.[23]

Q. Are the statements in Ms. Dragoo's rebuttal testimony dependent upon the same data that Staff has requested?

A. Yes. The Commission should not treat EMM's aggregate statistics as establishing the accuracy of individual customer bills. EMM has not provided any workpapers to substantiate the statistics provided in testimony and Staff has not received the bill-specific interval data necessary to independently verify or refute EMM's conclusions with any degree of certainty. Future retention of data by EMM could help ensure more accurate billing determinant information for all customers.

Q. Is Staff stating that EMM is intentionally issuing customer bills with incorrect information and collecting unwarranted amounts?

A. No. Staff is simply identifying that it is possible for customer bills to be issued with incorrect information and fall between the cracks of EMM's review thresholds without notice to EMM or to the customers. As Staff has outlined in direct testimony, tightening these thresholds would simply assist the inaccuracies being detected and corrected before the issuance of customer bills. Staff's recommendation to include any

[23] Company responses to Staff Data Requests 0219.1, 0219.2, 0219.3, 0219.5, and 0223.

interval estimation procedure in EMM's tariff will add transparency for customers, intervenors in future rate cases, and the Commission.

Q. Does staff have recommendations?

A. Yes. Staff has submitted recommendations in both direct and rebuttal testimony:

1. Use the estimated usage methodology stated in its current Commission approved tariff because EMM's present missing-interval estimation process does not appear to match the estimation procedure approved in its tariff;

2. Alternatively, the Commission should require EMM to file revised tariff language accurately describing the estimation methodology it actually uses and to show that the methodology is reasonable for ratepayers;

3. Continue attempting to obtain missing interval data and to adjust customer bills when actual data becomes available;

4. Maintain records of missing intervals, inserted estimated usage, the data supporting each estimate, and the circumstances requiring estimation;

5. Identify bills containing estimated usage and report to the Commission and Staff the level of usage and revenue being estimated; and

6. File an application for Commission approval, a tariff that addresses interval estimation procedures including testimony and analysis that justifies the process.

a. The proposed tariff procedures should avoid alteration of actual interval reads in determining customer bills.

b. The proposed tariff procedures should provide thresholds for automated and manual estimation, thresholds for identifying customer bills that include estimated intervals, and potential bill revision processes.[24] ;

Q. Does this conclude your surrebuttal testimony?

A. Yes it does.

[24] Staff recommends EMM consider modeling these thresholds to mirror those currently in use by Ameren Missouri.

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-2026-0143

AFFIDAVIT OF RANDALL T. JENNINGS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW RANDALL T. JENNINGS and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Surrebuttal / True-Up Direct Testimony Randall T. Jennings*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

RANDALL T. JENNINGS

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 3rd day of September 2026.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2029
Commission Number: 12412070

Notary Public