

Exhibit No. 242P

MoPSC Staff – Exhibit 242P
Contessa King
Rebuttal Testimony
File Nos. ER-2022-0129 & ER-2022-0130

Exhibit No.:
Issue(s): *Economic Relief Pilot
Program (ERPP),
Subscription Pricing
Program*

Witness: *Contessa King*

Sponsoring Party: *MoPSC Staff*

Type of Exhibit: *Rebuttal Testimony*

Case Nos.: *ER-2022-0129 and*

ER-2022-0130

Date Testimony Prepared: *July 13, 2022*

MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL AND BUSINESS ANALYSIS DIVISION

CUSTOMER EXPERIENCE DEPARTMENT

REBUTTAL TESTIMONY

OF

CONTESSA KING

**Evergy Metro, Inc. d/b/a Evergy Missouri Metro
Case No. ER-2022-0129**

**Evergy Missouri West, Inc. d/b/a Evergy Missouri West
Case No. ER-2022-0130**

*Jefferson City, Missouri
July 2022*

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CONTESSA KING

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1 **REBUTTAL TESTIMONY**

2 **OF**

3 **CONTESSA KING**

4 **EVERGY METRO, INC., D/B/A EVERGY MISSOURI METRO**

5 **CASE NO. ER-2022-0129**

6 **EVERGY MISSOURI WEST, INC., D/B/A EVERGY MISSOURI WEST**

7 **CASE NO. ER-2022-0130**

8
9 Q. Please state your name and business address.

10 A. My name is Contessa King. My business address is 200 Madison Street,
11 Jefferson City, Missouri 65101.

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

13 A. I am employed by the Missouri Public Service Commission (“Commission”)
14 as the Manager of the Customer Experience Department, Financial and Business
15 Analysis Division.

16 Q. Please describe your background and relevant work experience.

17 A. I started employment with the Missouri Public Service Commission in
18 January 2002 and have served in various capacities during my tenure at the Commission. I have
19 completed numerous internal and external trainings including the Center for Public Utilities
20 regulatory training at New Mexico State University. For a complete list of previous titles and
21 education, my credentials are attached to my testimony as Schedule CK-r1.

22 **EXECUTIVE SUMMARY**

23 Q. What is the purpose of this rebuttal testimony?

24 A. The purpose of this rebuttal testimony is to address Evergy Metro, Inc. d/b/a
25 Evergy Missouri Metro (“Evergy Metro or EMM”) and Evergy Missouri West, Inc. d/b/a

1 Evergy Missouri West (“Evergy Missouri or EMW) (collectively “Evergy”) requests to
2 continue and modify the Economic Relief Pilot Program (“ERPP” or “Program”). Additionally,
3 I will respond to Evergy’s proposal to create a Subscription Pricing Pilot Program (“flat bill”)
4 and Evergy’s requests for variances to Chapter 13 to implement the Subscription Pricing
5 Pilot Program.

6 **ECONOMIC RELIEF PILOT PROGRAM (ERPP)**

7 Q. What is the Economic Relief Pilot Program (ERPP)?

8 A. The ERPP is a low-income program designed to offer an opportunity to lessen
9 the financial hardship for qualifying residential customers. Participants with an annual
10 household income no greater than 200% of the federal poverty level (“FPL”) can receive up to
11 a sixty-five dollar (\$65.00) credit for 12 consecutive months. The monthly ERPP credit is
12 based on each qualifying customer’s average bill for the last 12 months’ bills. At the end of the
13 12-month period, a customer may reapply to continue participation in the Program.¹

14 Q. When did the Commission approve Evergy’s initial request for the ERPP?

15 A. The Commission approved the ERPP in Case No. ER-2009-0089 for EMM and
16 Case No. ER-2009-0090 for EMW as part of a Non-Unanimous Stipulation and Agreement.
17 The ERPP started on September 1, 2009, as a three-year pilot program. Commission decisions
18 in subsequent rate cases permitted continuation of the Program beyond the initial three years.
19 Since its inception in 2009, the ERPP has undergone several program design changes. Evergy
20 did not propose any changes to the ERPP in its last rate case(s) nor did the Commission order

¹ Kansas City Power and Light Company (KCP&L), PSC MO. No. 7, Currently Effective Sheets No. 43Z, 43Z.1 and 43Z.2.
KCP&L Greater Missouri Operations Company (KCP&L GMO), PSC MO. No. 1, Currently Effective Sheets No. R-62.15, R-62.16 and R-62.17.

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1 any changes to the Program. In the last rate case(s) Staff suggested minor changes to tariff
2 language and suggested a third party evaluation of the Program. Staff's recommendations were
3 not agreed to or implemented. The ERPP is in its thirteenth year.

4 Q. How is the ERPP currently funded?

5 A. In EMM's Case No. ER-2016-0285, the Commission approved ERPP funding
6 at \$1,260,000 annually. In EMW's Case No. ER-2016-0156, the Commission approved ERPP
7 funding at \$788,019 annually. Program funding is split 50% shareholder and 50% ratepayer.

8 Q. Is Evergy proposing any changes to Program funding in this rate case?

9 A. No. Evergy is not requesting an increase or decrease in annual Program funds or
10 changes to the matching mechanism currently in place. Staff witness Antonija Nieto addressed
11 Staff's accounting treatment of the ERPP in direct testimony filed June 8, 2022.

12 Q. You state that Evergy is not proposing changes to ERPP funding. Is Evergy
13 requesting any changes to the ERPP?

14 A. Yes.

15 Q. Which Evergy witness filed direct testimony supporting changes to the ERPP?

16 A. Evergy's direct testimony filed on January 7, 2022, did not include witness
17 testimony requesting changes to the ERPP. Staff questioned and Evergy confirmed that
18 proposed changes to ERPP are not in Evergy's direct testimony².

19 Q. Since Evergy's proposed changes to ERPP are not located in testimony, where
20 are the changes located?

²Schedule CK-r2, Staff Data Request Nos. 0251 and 0251S.

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1 A. Evergy’s proposed changes to ERPP are located in the redlined tariff sheets and
2 proposed tariff sheets submitted with this rate case(s). Additionally, in response to Staff Data
3 Requests, Evergy describes its proposed changes to ERPP.

4 Q. Please explain Evergy’s proposed changes to the ERPP.

5 A. Evergy is requesting removal of the “Pilot” designation of the Program and the
6 option of auto enrollment for unused funds at the end of the Program year.

7 Q. Does Evergy explain why it wants to remove the “Pilot” designation
8 from ERPP?

9 A. Evergy’s response to Staff Data Request No. 0336 states;

10 The Economic Relief Pilot Program has been assisting income eligible
11 customers since 2009. With the pandemic and more customers needing
12 relief, having the word “pilot” in the name could cause customers to
13 believe the program may not be around for long. This is the thirteenth
14 year for ERPP and there are no plans to discontinue this program.³

15 Q. Does Staff agree with Evergy’s statement that removal of the “Pilot” designation
16 is needed because customers could believe that the Program may not be around for long?

17 A. Not exactly. Evergy’s assumption that customers may believe that the Program
18 is temporary because the word “pilot” is in the name is understandable considering the meaning
19 of ”pilot”. However, Evergy does not support this notion by highlighting customer feedback
20 that indicates that eligible or participating customers are concerned about the cessation of the
21 Program. The Program is in its 13th year and some customers have participated for multiple
22 years knowing that the word pilot is in the name. Customers in need of financial assistance are
23 typically extremely appreciative of any financial relief provided. Evergy and its community

³ Schedule CK-r3, Staff Data Request Nos. 0330 and 0336.

1 partners that promote ERPP and the Salvation Army that processes ERPP applications should
2 be able to explain to potentially concerned customers that the Program was created in 2009 and
3 there are no plans to end the Program.

4 Q. Besides Evergy, what other regulated electric companies in Missouri currently
5 have payment assistance programs authorized as pilot programs?

6 A. Union Electric Company d/b/a Ameren Missouri has the Keeping Current
7 Low-Income Pilot Program (Keeping Current). The Commission initially approved Keeping
8 Current in Case No. ER-2010-0036. The Empire District Electric Company d/b/a Liberty
9 initiated its bill assistance program the Low-Income Pilot Program pursuant to Commission
10 orders in Case Nos. ER-2016-0023 and EO-2017-0041.

11 Q. Are you saying that Staff opposes Evergy's request to remove the "Pilot"
12 designation of the Program from the tariff and the name?

13 A. Staff's concern with the removal of "pilot" from the Program is based on
14 Staff's understanding on how utilities can lawfully design low-income programs. It is
15 Staff's understanding that low-income utility programs that include discounted rates on utility
16 bills have to include the pilot designation to avoid the appearance of undue discrimination given
17 the applied credit changes the rate that a program participant pays to the utility. Staff is of the
18 opinion that conceivably Evergy cannot remove the "Pilot" designation from its tariff because
19 ERPP is a low-income program that includes a fixed credit on participating customers' monthly
20 bills. Keeping the pilot designation provides some coverage from any potential legal challenges
21 regarding permanent low-income rates. Staff presumes that for marketing purposes Evergy can
22 remove "pilot" from the name only and promote the program as the Economic Relief Program,
23 and where appropriate keep the pilot description of the Program in the tariff.

1 Please note that I am not an attorney and it is Staff's belief that ultimately Evergy's
2 request to remove the "pilot" designation from the ERPP will require Commission
3 determination.

4 **ERPP - AUTO ENROLLMENT**

5 Q. Please explain Evergy's request to auto enroll customers in the ERPP.

6 A. If there are unused funds at the end of the Program calendar year Evergy wants
7 the option to auto enroll eligible Low Income Home Energy Assistance Program (LIHEAP)
8 customers that receive energy assistance for the current season and are not currently enrolled
9 in ERPP.

10 Q. Does Evergy explain how the auto enrollment process will work?

11 A. It does not explain in its direct testimony. I inquired about Evergy's proposal to
12 implement auto enrollment. Evergy explained that Evergy receives a weekly list of customers
13 who have received LIHEAP for the current season. Evergy plans to start with the initial list and
14 verify the customer is current with their Evergy account or current on a pay arrangement, has
15 active service and not currently enrolled in ERPP. Based on this information, customers will be
16 auto enrolled in ERPP and mailed a letter explaining the program and a copy of the terms
17 and conditions.⁴

18 Q. Did you review ERPP participation and enrollment data that may explain
19 Evergy's auto enrollment proposal?

20 A. Yes. I reviewed Evergy's response to Staff Data Request No. 0329.2,⁵ and
21 monthly enrollment has been steady for EMM and EMW from June 2019 to March 2022, which

⁴ Evergy's response to Staff Data Request Nos. 0336 and 0330.

⁵ Schedule CK-r4, Staff Data Request No. 0329.2.

1 indicates to me that the Salvation Army is consistent in getting participants enrolled and
2 that funds are available to support each participant. Additionally, I reviewed Staff witness
3 Antonija Nieto's workpapers associated with Staff Data Request No. 0193, that indicate EMM
4 and EMW are underspending allocated ERPP funds. According to Evergy, the last time the
5 Program was full was January 2019 for EMW and May 2019 for EMM.⁶ Since Evergy did not
6 provide witness testimony offering a detailed explanation on why it proposes the option to auto
7 enroll customers, Staff can only surmise by its analysis that Evergy is attempting to increase
8 participation numbers and reduce unspent ERPP funds.

9 Q. What are your thoughts on Evergy's request to auto enroll customers?

10 A. Staff understands the importance of customer outreach and the need to get
11 eligible customers enrolled in the Program; therefore, Staff supports the proposal to send
12 eligible customers a letter. However, Staff does not support giving Evergy the option of
13 automatically enrolling customers in the ERPP as proposed by Evergy.

14 Q. Do you have an alternative for the Commission to consider?

15 A. Yes I do. If unused funds are available at the end of the Program year, Evergy
16 should aggressively target and encourage eligible customers to amicably opt-in to the Program
17 instead of auto enrollment.

18 Q. Can you please elaborate?

19 A. Staff supports Evergy's efforts to send letters to eligible LIHEAP recipients,
20 however instead of the letter advising the customer that they are automatically enrolled in
21 ERPP; the letter would explain how a customer could opt-in to the Program. At minimum, the
22 letter can explain that the customer is pre-approved for the ERPP, provide an estimated credit

⁶ Evergy response to Staff Data Requests Nos. 0334, 0334.1, 0328 and 0328.1.

1 amount, include the ERPP terms and conditions, and instruct the customer to respond to the
2 letter if interested in participating. The letter should include a toll free number for customers
3 to call in order to inquire about the Program and enroll (opt-in) if interested.

4 Q. Why do you recommend opt-in instead of automatic enrollment?

5 A. Customers that display initiative by responding to the letter and accepting the
6 terms of the Program may be more likely to stay on the Program. Additionally, requiring the
7 customer to call in to enroll (opt-in) as instructed in the letter provides Program administrators an
8 opportunity to explain the Program in detail to the customer and suggest other payment
9 assistance or energy efficiency programs that may benefit the customer.

10 **ERPP – PROGRAM EVALUATION**

11 Q. Evergy's last program evaluation was conducted by a third party evaluator in
12 2012. Given the various program design changes over the years, do you think it is time for
13 Evergy to perform another program evaluation?

14 A. Yes. To identify opportunities for improvement and ensure the ERPP is
15 providing the desired outcomes I recommend a comprehensive assessment of the ERPP before
16 Evergy files its next rate case(s). The Program was designed to undergo assessment, KCP&L
17 2nd Revised Sheet No. 43Z.3 and KCP&L GMO 2nd Revised Sheet No. R-62.18 states:

18 The pilot program may be evaluated in any Company rate or complaint
19 case. The evaluation shall be conducted by an independent third party
20 evaluator under contract with the Company that is acceptable to the
21 Company, Commission Staff and the Public Counsel. The costs of the
22 evaluator shall be paid from the program funds.⁷

⁷ KCP&L, PSC MO No. 7, 2nd Revised Sheet No. 43Z .3.
KCP&L GMO, PSC MO No. 1, 2nd Revised Sheet No.R-62.18.

1 Q. Is Staff contending that an independent third-party perform an evaluation?

2 A. Staff is not insisting on a third-party evaluator at this time. The maximum
3 amount possible of ERPP funds should go toward assisting participants therefore Staff
4 recommends minimizing costs associated with performing a program assessment by not using
5 a third-party evaluator if too costly. It would be beneficial if collaborative discussions occurred
6 between Staff, Evergy, OPC, and stakeholders to explore low cost opportunities to evaluate the
7 Program without Evergy commissioning a third-party consultant. Staff recommends that the
8 Commission order Evergy to collaborate with Staff, OPC, and pertinent stakeholders to develop
9 a cost effective program evaluation strategy. The program evaluation should examine the
10 effectiveness of the Program, assess administrative, implementation and marketing processes,
11 conduct interviews with participants⁸ and Salvation Army employees that enroll customers, and
12 include surveys of applicants and participants that completed and those that did not complete
13 the Program.

14 **SUBSCRIPTION PRICING PILOT PROGRAM**

15 Q. Can you please summarize Evergy's Subscription Pricing Pilot Program
16 proposal?

17 A. Evergy is proposing a subscription pricing pilot for residential customers in
18 good financial standing. Subscription pricing allows customers to pay a fixed monthly
19 bill based on the customer's previous twelve months of weather normalized usage.
20 This voluntary program requires participants to sign a contract with a contract period of

⁸KCP&L tariff sheet 43Z.1 and KCP&L GMO tariff sheet R-62.16 states that "Participants must provide, via an interview or questionnaire, information related to their energy use and program participation. Any information provided in these interviews or questionnaires that is later made public will not be associated with the participant's name."

1 12 months and a \$50.00 “Removal Charge” for participants that are unable to complete the
2 12-month term. The “Removal Charge” will be waived for customers who change locations
3 within Evergy’s service territories. All riders, clauses, and if feasible, applicable taxes will be
4 included in the fixed bill calculation. Adders will be applied to the base fixed bill to
5 mitigate the increased financial risks to Evergy shareholders and to recover program costs
6 from participants. The customer’s subscription pricing offer will include a behavioral usage
7 adder, a risk premium adder, and a program cost adder.⁹

8 Q. Are there additional features associated with the Subscription Pricing
9 Pilot Program?

10 A. Yes. Evergy is proposing an incentive that it states is a no-risk financial incentive
11 that rewards customers for limiting their energy usage, and two optional add-ons that Evergy
12 states are designed to encourage the adoption of smart thermostats and the purchase of
13 renewable energy credits. To allow time for full development of the pilot given the complexity
14 of developing and creating the offer, Evergy proposes that the Commission approve its request
15 to offer this program to customers on or after October 1, 2023.¹⁰ Enrollment will be capped at
16 20,000 participants.¹¹

17 The direct testimony of Evergy witness Ryan Hledik, of The Brattle Group, includes
18 additional details on Evergy’s subscription pricing pilot.

19 Q. Evergy states that, due to the nature of the Subscription Pricing Pilot Program,
20 variances to Commission rules are needed. Which rules does Evergy seek to waive?

⁹ ER-2022-0129 and ER-2022-0130, Direct Testimony of Ryan Hledik, p. 14.

¹⁰ ER-2022-0129 and ER-2022-0130, Direct Testimony of Kimberly H. Winslow, p. 23.

¹¹ In Staff Data Requests Nos. 404 and 408, Staff inquired about the 20,000 enrollment cap; Evergy responded that the enrollment targets proposed are for EMM/EMW combined.

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1 A. Evergy seeks variances to several provisions in 20 CSR 4240 13.020 Billing and
2 Payment Standards. A list of the waivers are included in the cover letter to this case(s) and
3 provided in Schedule KHW-1 of Evergy witness Kimberly H. Winslow's direct testimony.

4 Q. Should the Commission grant Evergy's requests for variances to
5 Chapter 13.020?

6 A. No. Staff recommends that the Commission deny Evergy's requests to
7 implement a Subscription Pricing Pilot Program and consequently deny Evergy's requests for
8 variances to Chapter 13 in order to implement the pilot.

9 Q. Are you aware of other Staff that filed testimony opposing the Subscription
10 Pricing Pilot Program?

11 A. Yes, Staff member Sarah Lange, Economist from the Tariff/Rate Design
12 Department, also filed testimony concerning proposed future revenue treatments.

13 Q. Why does Staff oppose Evergy's requests for variances?

14 A. Given the unpredictability of COVID-19, inflation, and economic uncertainty,¹²
15 Staff cannot in good conscience support a pilot program that removes protections and
16 disclosures mandated in 13.020 Billing and Payment Standards. It is important that customers
17 are knowledgeable on their energy usage and Commission rules require utilities to provide
18 customers billing statements with detailed information on consumption. Monthly bills based on
19 actual usage provides information that can empower customers to make informed decisions
20 about usage and conservation considerations. Additionally, participants could potentially under
21 or over pay while on this program. Taking into account the potential for over payment,

¹² [Consumer confidence dips on worries over inflation and slowing U.S. economy - MarketWatch](#)

1 particularly through the adders, at this time Staff does not support residential customers paying
2 for more than actually used, not even on a voluntary basis.

3 Q. Mr. Hledik states in his direct testimony that “Evergy’s subscription pricing pilot
4 will provide residential customers with an entirely fixed monthly electricity bill. In this sense,
5 Evergy’s proposal is similar to the way customers pay for subscription-based services and club
6 memberships.¹³” What are your thoughts on Evergy comparing its offering to non-utility
7 subscription-based services?

8 A. Evergy is a monopoly that provides an essential service, a service needed to
9 sustain life and health for many customers. Evergy does not provide competitive services like
10 Netflix, Hulu, and Gold’s Gym, and Staff is hopeful that the Commission does not lose sight of
11 that fact when deliberating proposals of this nature.

12 Q. By Evergy witnesses’ own admission, developing and offering a subscription
13 pricing program is a complex process. Do you have concerns with residential customers fully
14 understanding the program before entering into a 12-month contract?

15 A. Considering the complexity of this proposed pilot program it may take a
16 sophisticated customer or a customer that is willing to do extensive research to understand the
17 intricacies associated with the program (i.e. behavioral usage adder, program cost adder, risk
18 premium adder, efficiency incentive, add-on options). Staff is concerned that marketing
19 messaging may focus too much on the option for a fixed monthly bill; no hidden fees angle and
20 not fully educate customers on the various aspects of the program.

¹³ ER-2022-0129 and ER-2022-0130, Direct Testimony of Ryan Hledik, p. 3.

Rebuttal Testimony of
Contessa King

1 Q. What are you basing your assertion on?

2 A. On page 20 of Mr. Hledik's direct testimony he states the following:

3 Q. Given the complexity in designing the subscription pricing offer, can
4 it be kept simple for customers?

5 A. Yes. Despite complexity in calculating the subscription pricing offer,
6 it is still an extremely simple concept from the customer's standpoint.
7 For instance, messaging to the customer could be as simple as the
8 following:

9 Your subscription pricing offer is \$130 per month. No hidden fees, no
10 surprises. It's the same every month!

11 Additionally, you are eligible for an incentive if you use the same or less
12 than last year. If your annual usage* does not increase during the
13 12-month term, you will earn \$70 at the end of the 12 months.

14 * Your usage will be adjusted for weather effects. So you may still be
15 able to earn the incentive even if the weather is hotter or colder than
16 average.

17 As you can see, Mr. Hledik who is Evergy's consultant, uses messaging examples that omit key
18 conditions like the 12-month contract requirement, the program fee and the additional adders
19 that are included in the fixed bill calculation.

20 Q. Did Staff review Evergy's customer research on rate plan options?

21
22 A. Staff reviewed the qualitative research and quantitative research¹⁴ referenced on
23 pages 22-23 of Ms. Winslow's direct testimony. Staff agrees with Ms. Winslow's
24 description of the qualitative research that indicates that there is interest in subscription pricing
25 among the segment of moderate-income households. Renters and low-income customers are
26 less interested. The qualitative research was based on 39 customer interviews. Quantitative
27 research was conducted using Evergy's Customer Advisory Panel, which Evergy states is
28 nearly 2000 customers. Staff's analysis of the research infers that almost half of Evergy's

¹⁴ In response to Staff Data Requests Nos. 0405 and 0409, Evergy referred Staff to its response to OPC Data Request No. 2020.

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1 respondents are interested in optional rate plans; however virtually as many do not appear
2 interested in optional rate plans.

3 Q. Can you please summarize the recommendations in your rebuttal testimony?

4 A. Yes.

- 5 • Staff recommends that the Commission deny Evergy's requests to offer
6 customers a subscription-pricing rate plan;
- 7 • Staff recommends that the Commission reject Evergy's requests for
8 variances to Chapter 13 Billing and Payment Standards that are needed to
9 offer and create the proposed Subscription Pricing Pilot Program;
- 10 • Staff recommends that the Commission deny Evergy's requests to
11 auto-enroll eligible ERPP customers into the Program, and adopt Staff's
12 opt-in proposal instead;
- 13 • Staff recommends a comprehensive assessment of the ERPP before Evergy
14 files its next rate case(s);
- 15 • Staff recommends that the Commission resolve in its Report and Order if
16 Evergy can remove the Pilot designation from the Economic Relief Pilot
17 Program.

18 Q. Does this conclude your rebuttal testimony?

19 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) Case No. ER-2022-0130
Authority to Implement a General Rate)
Increase for Electric Service)

AFFIDAVIT OF CONTESSA KING

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW CONTESSA KING and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Contessa King*; and that the same is true and correct according to her best knowledge and belief.

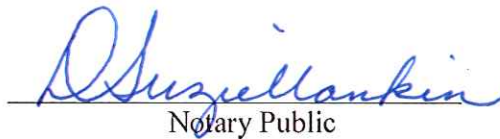
Further the Affiant sayeth not.


CONTESSA KING

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 7th day of July, 2022.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070


Notary Public

Contessa King
Customer Experience Department
Financial and Business Analysis Division

Professional Experience:

*Regulatory Compliance Manager, Financial and Business Analysis Division & Staff Division
(November 2017-present)*

Outreach and Diversity Officer, Administration (2015-2017)

Consumer Outreach Coordinator, Administration (2013-2015)

Utility Policy Analyst I, Operations (2012-2013)

Consumer Services Coordinator/Assistant Manager, Administration & Staff Counsel (2007-2012)

Consumer Services Specialist II, Administration (2005-2007)

Senior Office Support Assistant, Adjudication (2002-2005)

Missouri Secretary of State's Office, Corporations Unit (2000-2002)

KMIZ TV - FOX 11, Benedek Broadcasting Company (1994-2000)

I graduated from the University of Missouri-Columbia with a Bachelor of General Studies (a multidisciplinary degree) areas of study: Communications, Mass Communications and Humanities. In October 2011, I attended the Center for Public Utilities regulatory training at New Mexico State University.

Participant in the first, second, and fourth partnership exchange between the Commission and the National Energy Regulatory Agency of Moldova (ANRE), traveled to Chisinau, Moldova June 2010. Contributions include a two-part presentation on consumer affairs, trained ANRE delegates, assisted with the re-engineering of the Commission's Electronic Filing Information System (EFIS) capability, developed a new workflow procedure for ANRE's petitions/complaints process and assisted with partnership coordination efforts. Partnership supported by National Association of Regulatory Utility Commissioners (NARUC) and the United States Agency for International Development (USAID).

Selected to participate in a partnership exchange between NARUC and the Nigerian Electric Regulatory Commission (NERC); traveled to Abuja, Nigeria October 2012 (partnership exchange supported by USAID). Invited to participate in a partnership exchange between NARUC and the Kenya Energy Regulatory Commission (ERC); traveled to Nairobi, Kenya May 2016 (partnership exchange supported by USAID and Power Africa).

Case Participation:

The following is a listing of cases before the Commission in which I provided testimony, Staff recommendation(s) or significant analysis:

**Contessa King
Case Participation**

Date Filed in EFIS	Case Number	Company Name – Type of Case	Contribution
2/21/2021	AO-2021-0264	Cause of the February 2021 Cold Weather Event and its Impact on Investor Owned Utilities	Staff Report
5/11/2020	AW-2020-0356	Working Case to Consider Best Practices for Recovery of Past-Due Utility Customer Payments After the Covid-19 Pandemic Emergency	Staff Report
11/25/2019	AW-2020-0148	Working Case to Reconsider a Proposed Residential Customer Disconnection Data Reporting Rule	Analysis
6/14/2017	AW-2017-0336	General Review of Commission Rules	Analysis
6/27/2018	AW-2018-0393	Working Case for the Writing of a New Rule on the Treatment of Customer Information by Regulated Utilities and Their Affiliates and Nonaffiliates	Analysis
2/9/2011	AW-2011-0252	Working File to Consider Changes to Chapter 13 Service and Billing Practice Rules	Analysis
9/18/2019	AX-2020-0076	Proposed Rule Regarding the Treatment of Customer Information by Commission Regulated Utilities	Analysis
11/9/2018	AX-2018-0395	Proposed Revisions to Improve the Commission's Rules (Chapter 13 Rules)	Analysis
8/29/2012	AX-2013-0091	Proposed Rulemaking to Amend 4 CSR 240-13 Service and Billing Practices for Residential Customers	Analysis
8/20/2009	AX-2010-0061	Public Counsel's Petition for Promulgation of Rules Relating to Billing and Payment Standards for Residential Customers	Analysis
11/12/2012	CA-2013-0271	New Horizons Communications Corp. - Application for Certificate	Staff Recommendation
5/9/2013	CA-2013-0492	Giant Communications, Inc. - Application for Certificate	Staff Recommendation
6/28/2013	CA-2013-0548	FidelityLink, LLC - Application for Certificate	Staff Recommendation
7/30/2013	CO-2014-0025	Metropolitan Telecommunications of Missouri, Inc. – Application to Expand Certificate of Basic Local Service Authority	Staff Recommendation
1/18/2019	EC-2019-0168	Jill Covington Beatty v. Ameren Missouri - Complaint Case	Staff Report and Testimony
10/31/2017	EC-2018-0113	Anthony R. Granillo v. Ameren Missouri - Complaint Case	Analysis

Contessa King
Case Participation

Date Filed in EFIS	Case Number	Company Name – Type of Case	Contribution
10/02/2019	EE-2019-0382	Ameren Missouri's Request for a Waiver to Various Tariffs and Regulation to Enable the Deployment of Automated Metering Infrastructure Beginning in 2020	Analysis
1/12/2018	EM-2018-0012	Application of Great Plains Energy Incorporated for Approval of its Merger with Westar Energy, Inc.	Analysis
8/6/2020	EO-2021-0032	An Agreement Between Evergy, Inc., and Elliott Management, Inc.	Staff Report
11/6/2018	EO-2019-0132 EO-2019-0133	Kansas City Power & Light Company's Notice of Intent to File an Application for Authority to Establish a Demand-Side Programs Investment Mechanism	Analysis
8/25/2014	EO-2015-0055	Ameren Missouri's 2nd Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA - Flex Pay Application Filed 11/30/2017	Analysis
5/28/2021	ER-2021-0312	The Empire District Electric Company d/b/a Liberty – General Rate Case	Direct – Cost of Service Staff Report, Rebuttal
7/3/2019	ER-2019-0335	Union Electric Company d/b/a Ameren Missouri – General Rate Case	Direct – Class Cost of Service Staff Report, Rebuttal
6/18/2018	ER-2018-0145	Kansas City Power & Light Company - General Rate Case	Direct – Cost of Service Staff Report
6/18/2018	ER-2018-0146	KCP&L Greater Missouri Operations Company - General Rate Case	Direct – Cost of Service Staff Report
12/1/2011	ER-2012-0174	Kansas City Power & Light Company - General Rate Case	Direct, Rebuttal, Surrebuttal
12/1/2011	ER-2012-0175	KCP&L Greater Missouri Operations Company - General Rate Case	Direct, Rebuttal, Surrebuttal
9/21/2020	ET-2021-0082	Union Electric Company d/b/a Ameren Missouri for Approval of its Surge Protection Program	Staff Report
8/6/2012	EW-2013-0045 GW-2013-0046 WW-2013-0047	Working Case (Consolidated) to Consider the Establishment of a Low-Income Customer Class or Other Means to Help Make Utility Services Affordable	Analysis
12/5/2019	GC-2020-0057	William L. Hackney & Catrina Hackney v. Spire – Complaint Case	Analysis

Contessa King
Case Participation

Date Filed in EFIS	Case Number	Company Name – Type of Case	Contribution
6/15/2018	GC-2018-0377	Imri Meiron v. Spire - Complaint Case	Analysis
12/6/2017	GC-2018-0159	Lisa Lambert v. Spire - Complaint Case	Analysis
1/22/2013	GC-2013-0361	William Wehrle v. Laclede Gas Company – Complaint Case	Analysis
2/2/2006	GC-2006-0318	Staff v. Laclede Gas Company - Complaint Case	Analysis
1/21/2022	GO-2022-0022	Staff's Investigation of Spire STL Pipeline's Application at FERC for a Temporary Certificate to Operate	Staff Report
3/16/2018	GO-2018-0251	Investigation of Customer Service Issues at Spire Missouri, Inc.	Staff Report
1/17/2018	GO-2018-0195	Investigation into the Interruption Of Summit's Gas Deliveries in the Lebanon, Missouri Region	Analysis
1/24/2022	GR-2021-0320	The Empire District Gas Company d/b/a Liberty – General Rate Case	Direct – Cost of Service
4/13/2018	GR-2018-0013	Liberty Utilities (Misstates Natural Gas) Corp. d/b/a Liberty Utilities – General Rate Case	Analysis
1/24/2013	TA-2013-0363	Matrix Telecom, Inc. d/b/a VarTec Telecom – Application for Certificate	Staff Recommendation
1/24/2013	TA-2013-0364	Matrix Telecom, Inc. d/b/a Excel Telecommunications – Application for Certificate	Staff Recommendation
4/23/2013	TA-2013-0464	TNCI Operating Company LLC – Application for Certificate	Staff Recommendation
9/24/2013	TA-2014-0083	Angel Americas, LLC – Application for Certificate	Staff Recommendation
11/15/2012	TD-2013-0275	360networks (USA), Inc. - Cancellation of Certificate of Service Authority	Staff Recommendation
11/15/2012	TD-2013-0276	AboveNet Communications, Inc. - Cancellation of Certificate of Service Authority	Staff Recommendation
7/8/2019	WC-2019-0324	Cordney Jack Travis v. Missouri-American Water Company – Complaint Case	Analysis
3/3/2006	WC-2006-0345	Dione C. Joyner v. Missouri-American Water Company - Complaint Case	Staff Recommendation
12/15/2017	WR-2018-0170 SR-2018-0171	Liberty Utilities (Missouri Water) - Small Utility Rate Case	Analysis



Evergy Missouri Metro
Case Name: 2022 Evergy MO Metro Rate Case
Case Number: ER-2022-0129

Requestor King Contessa -
Response Provided March 28, 2022

Question:0251S

SUPPLEMENTAL

On page 15, Evergy witness Kim Winslow provides a graphic of Evergy's proposed programs and existing programs addressed in her filing and within Evergy's witnesses' testimonies. The graphic does not include the ERPP program nor is ERPP listed as a Low-Income program on page 17 of Winslow's testimony. Does EMM and EMW plan to continue ERPP, and if so, are there proposed changes to ERPP and where can Staff find testimony regarding the future of ERPP in Evergy testimonies? Contessa King (Contessa.king@psc.mo.gov)

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

Per the response to 0251 in this EO-2022-0129 case, the proposed changes are laid out in the redlined tariff submission for this case for the Economic Relief Program. The Company is requesting in this rate case to remove the Pilot designation of the program and provide the option of auto enrollment for unused funds at the end of the program year. There is not an additional location of detail in testimony.

Information provided by: Brian File, Director - Products

Attachment(s):



Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs

SCHEDULE CK-r2

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Evergy Missouri West
Case Name: 2022 Evergy MO West Rate Case
Case Number: ER-2022-0130

Requestor King Contessa -
Response Provided March 25, 2022

Question:0252S

SUPPLEMENTAL

On page 15, Evergy witness Kim Winslow provides a graphic of Evergy's proposed programs and existing programs addressed in her filing and within Evergy's witnesses' testimonies. The graphic does not include the ERPP program nor is ERPP listed as a Low-Income program on page 17 of Winslow's testimony. Does EMM and EMW plan to continue ERPP, and if so, are there proposed changes to ERPP and where can Staff find testimony regarding the future of ERPP in Evergy testimonies? Contessa King (Contessa.king@psc.mo.gov).

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

Per the response to 0252 in this EO-2022-0130 case, the proposed changes are laid out in the redlined tariff submission for this case for the Economic Relief Program. The Company is requesting in this rate case to remove the Pilot designation of the program and provide the option of auto enrollment for unused funds at the end of the program year. There is not an additional location of detail in testimony.

Information provided by: Brian File, Director - Products

Attachment(s):



Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs

SCHEDULE CK-r2

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Evergy Missouri West
Case Name: 2022 Evergy MO West Rate Case
Case Number: ER-2022-0130

Requestor King Contessa -
Response Provided April 13, 2022

Question:0336

Based on the proposed ERPP tariff sheets, EMM and EMW propose removing the Pilot designation and adding the option of auto enrollment. Please explain in detail why the companies want to remove the Pilot designation and how do the companies propose implementing auto enrollment. Data Request submitted by Contessa King (Contessa.king@psc.mo.gov).

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

The Economic Relief Pilot Program has been assisting income eligible customers since 2009. With the pandemic and more customers needing relief, having the word “pilot” in the name could cause customers to believe the program may not be around for long. This is the thirteenth year for ERPP and there are no plans to discontinue this program.

Auto Enrollment – this option will only be used if there is an excess of available enrollments in the ERP Program at the end of each quarter. Customers will be chosen based on LIHEAP enrollment. Evergy receives a weekly list of customers who have received LIHEAP EA this season. We will start with the initial list and verify the customer is current with their Evergy account or current on a pay arrangement, has active service and not currently enrolled in ERPP. Based on this information, customers will be auto enrolled in ERPP and mailed a letter explaining the program and a copy of the terms and conditions.

Information provided by: Maria Lopez

Attachment(s):



Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Missouri Metro
Case Name: 2022 Evergy MO Metro Rate Case
Case Number: ER-2022-0129

Requestor King Contessa -
Response Provided April 13, 2022

Question:0330

Based on the proposed ERPP tariff sheets, EMM and EMW propose removing the Pilot designation and adding the option of auto enrollment. Please explain in detail why the companies want to remove the Pilot designation and how do the companies propose implementing auto enrollment. Data Request submitted by Contessa King (Contessa.king@psc.mo.gov).

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

Please see previously provided response to data request number 336 within rate case number ER-2022-0130.

Information provided by: Maria Lopez

Attachment(s):

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently



discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Missouri Metro
Case Name: 2022 Evergy MO Metro Rate Case
Case Number: ER-2022-0129

Requestor King Contessa -
Response Provided May 18, 2022

Question:0329.2

Evergy's response to Staff DRs 0329 (EMM) and 0335 (EMW) differ from Evergy's response to OPC's DR 2069. Evergy's yearly participation numbers are not the same in the responses. Please advise which Company response(s) include the correct total number of participants for each calendar year requested, and explain why the response to OPC differs from the Company response to Staff. If there are differences between calendar year participation numbers versus calendar year enrollment numbers please provide correct(ed) numbers and an explanation on the difference between the two. Contessa King (Contessa.king@psc.mo.gov)

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

An oversight was discovered in the ERPP numbers that were provided to the Staff (question #0329). The numbers provided for MO West did not include the St. Joseph territory, which were tracked separately through 10/2019. The MO West numbers for 2018 and 2019 were added to the MO Metro totals in error. The program participation totals and monthly enrollments have been counted and verified.

Information provided by: Gwen Spratt & Maria Lopez

Attachment(s): 0329.2 ERPP Participant Data – 2018-2022YTD.



Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs

MO Metro		
Month	Total Participants	Participants Enrolled
Jan-18	1,984	182
Feb-18	2,034	235
Mar-18	1,857	104
Apr-18	1,833	0
May-18	1,673	0
Jun-18	1,803	218
Jul-18	1,851	220
Aug-18	1,870	252
Sep-18	1,950	261
Oct-18	2,035	279
Nov-18	2,028	194
Dec-18	1,994	175
2018 Total	22,912	2,120

MO West		
Month	Total Participants	Participants Enrolled
Jan-18	1,681	176
Feb-18	1,740	192
Mar-18	1,975	219
Apr-18	1,882	76
May-18	1,758	0
Jun-18	1,676	0
Jul-18	1,535	1
Aug-18	1,402	0
Sep-18	1,192	0
Oct-18	953	0
Nov-18	780	0
Dec-18	584	0
2018 Total	17,158	664

MO Metro		
Month	Total Participants	Participants Enrolled
Jan-19	2,009	161
Feb-19	1,786	0
Mar-19	1,676	0
Apr-19	1,653	0
May-19	1,786	0
Jun-19	1,547	125
Jul-19	1,456	125
Aug-19	1,337	125
Sep-19	1,208	125
Oct-19	1,081	125
Nov-19	1,024	125
Dec-19	988	125
2019 Total	17,551	1,036

MO West		
Month	Total Participants	Participants Enrolled
Jan-19	448	0
Feb-19	392	125
Mar-19	317	126
Apr-19	397	142
May-19	392	108
Jun-19	621	130
Jul-19	740	125
Aug-19	851	122
Sep-19	944	103
Oct-19	1,059	128
Nov-19	1,122	80
Dec-19	1,155	52
2019 Total	8,438	1,241

MO Metro		
Month	Total Participants	Participants Enrolled
Jan-20	963	125
Feb-20	1,077	125
Mar-20	1,191	125
Apr-20	1,653	113
May-20	1,376	92
Jun-20	1,370	110
Jul-20	1,367	126
Aug-20	1,394	140
Sep-20	1,447	172
Oct-20	1,448	133
Nov-20	1,430	112
Dec-20	1,424	125
2020 Total	16,140	1,498

MO West		
Month	Total Participants	Participants Enrolled
Jan-20	1,193	52
Feb-20	1,108	39
Mar-20	1,094	109
Apr-20	397	132
May-20	1,115	128
Jun-20	1,109	115
Jul-20	1,111	119
Aug-20	1,109	115
Sep-20	1,139	120
Oct-20	1,160	143
Nov-20	1,187	87
Dec-20	1,201	77
2020 Total	12,923	1,236

MO Metro		
Month	Total Participants	Participants Enrolled
Jan-21	1,425	121
Feb-21	1,426	129
Mar-21	1,427	125
Apr-21	1,440	125
May-21	1,466	124
Jun-21	1,492	126
Jul-21	1,491	125
Aug-21	1,482	125
Sep-21	1,464	138
Oct-21	1,501	185
Nov-21	1,562	203
Dec-21	1,566	136
2021 Total	17,742	1,662

MO West		
Month	Total Participants	Participants Enrolled
Jan-21	1,240	91
Feb-21	1,284	92
Mar-21	1,309	135
Apr-21	1,302	120
May-21	1,279	111
Jun-21	1,298	137
Jul-21	1,287	112
Aug-21	1,336	170
Sep-21	1,356	136
Oct-21	1,365	147
Nov-21	1,411	167
Dec-21	1,435	113
2021 Total	15,902	1,531

MO Metro		
Month	Total Participants	Participants Enrolled
Jan-22	1,578	133
Feb-22	1,598	154
Mar-22	1,667	193
2022 Total	4,843	480

MO West		
Month	Total Participants	Participants Enrolled
Jan-22	1,474	126
Feb-22	1,481	102
Mar-22	1,482	138
2022 Total	4,437	366

