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OPC – Exhibit 322 Lisa A. Kremer Direct Testimony File Nos. ER-2022-0129 & ER-2022-0130

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

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)			
COUNTY OF COLE) ss			

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 8^{th} day of June 2022.

NOTARY C

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

My Commission expires August 8, 2023.

Tiffany Hildebrand

Notary Public

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DIRECT TESTIMONY

OF

LISA KREMER

EVERGY METRO CASE NO. ER-2022-0129

EVERGY WEST CASE NO. ER-2022-0130

I. INTRODUCTION

- Q. Please state your name, title, and business address.
- A. Lisa Kremer. Consultant for the Office of the Public Counsel ("OPC"). 705 Briarwood Court, Jefferson City, MO, 65109.
- Q. Please describe your education and employment background.
- A. I have a Bachelor of Science Degree in Public Administration and a Master's Degree in Business Administration from Lincoln University. I am also a Certified Internal Auditor ("CIA") and a member of the Central Missouri Institute of Internal Auditors. I have approximately 35 years of utility regulatory experience with most of my experience occurring while serving on the Staff of the Missouri Public Service Commission ("Missouri PSC" or "PSC") performing and leading management, operational and service quality audits, and reviews as well as other utility investigatory work and projects. After my employment with the Missouri PSC, I was employed for several years by the Missouri Division of Energy as Manager of the Energy Policy and Resources Unit. A listing of more specific utility regulatory projects, audits, investigations and reviews I have participated in and testimonies I have filed are included as Schedule 1 to my testimony.

Q. What is the purpose of your Direct Testimony?

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

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

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

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

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

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

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

- Q. What is a Customer Information System and what purpose does it serve for Evergy and its Missouri customers?
- A. As provided by Mr. Forrest Archibald's Direct Testimony in case nos. ER-2018-0145, and ER-2018-0146, page 3 line 16 through page 4 line 5, "the customer information system is

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

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

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

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

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

- Account Summary
- Make A Payment
- Payment History
- Bill History
- Preferences
- Energy Analyzer
- 24-Month Report
- Energy Usage

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

² Evergy's Website <u>www.evergy.com</u> Section: Understanding My Bill.

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

- Q. Can the OPC request specific customer portal screens from Evergy when the office has received and is responding to customer complaints or inquiries or at other times?
- A. Yes. However, providing the Office of the Public Counsel with access to the account portal on an on-going basis as envisioned and described in this testimony would enable the office to better understand critical and changing customer-facing portal information and its affects This important utility process that directly "touches" the upon the regulated customer. regulated customer should be accessible to Missouri's consumer advocate and is aligned with the statutory purpose of the Office of the Public Counsel.³
- Q. Do you have thoughts regarding how OPC's request for either existing or simulated customer account access could be fulfilled while protecting customer privacy?
- A. Yes. I recommend the Companies evaluate the creation of simulated customer portal logins for OPC or permit OPC to utilize some existing customer portals to provide it the ability to observe and experience what Evergy customers experience as they are served by their utility. This could be handled in one of two ways: 1) providing OPC with actual customer accounts with the customer's name, address and other personally identifiable information omitted or 2) providing OPC with simulated customer accounts with simulated usage, rate plan(s), etc. I suggest once the Companies have an opportunity to consider OPC's recommendation in this case and perform the evaluation that OPC is recommending, that it and OPC engage in discussion to move forward in a cooperative manner to permit the office to have such customer experience access.
- Q. Operationally, is the access you are proposing possible?
- A. It should be. The Companies have significant testimony in case nos. ER-2018-0145 and ER-2018-0146 indicating the robust nature of its customer information system. My 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;").

Case No. ER-2022-0129 & ER-2022-0130 system.⁴ Given the significant cost of Evergy's CIS system, it should be possible to provide the Missouri consumer advocate full access to the important regulatory tool I have

proposed.

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

- A. Yes. Such customer portal access for OPC creates a more open space of dialogue and understanding between Evergy, regulated utility consumers, and the OPC regarding important customer facing information and education. It also reduces the burden on the Companies to periodically provide customer portal information to OPC upon its request and may ultimately reduce the Companies' need to explain it. Such access will permit and encourage a more efficient and streamlined understanding between OPC and each Company of the customer engagement they have with their customers. Further, as utility information available to customers has evolved over time in both increased volume and sometimes increased complexity, this type of customer portal access will create an environment of greater understanding of Evergy customer experience for OPC in its consumer advocate role.
- 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.
 - Q. Do you know why the Company declined OPC's request for customer portal access?
 - 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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- Can you think of any reason a request of this nature would be of such concern by the Q. Company to deny it?
- A. No. Such access to the information customers are provided regarding their account is logical for a consumer advocate to have. Further the Office of the Public Counsel is bound by Missouri state statute regarding its treatment of confidential information should that matter be a concern for the Company.⁵
- Q. Are you aware whether any Missouri Public Service Commission employee has access to Evergy's customer portal information?
- A. Any Commission member, Advisor, or Staff currently served by Evergy would have access to the customer portal information if they chose to. In conversation with the prior Manager of the Commission's Consumer Services Unit, Ms. Gay Fred, it is my understanding that she had, like OPC, requested access to the Company's CSI customer portal and had been denied. In response, she had sought the willingness of Commission staff members served by Evergy (KCPL at the time) to share specific customer screens, etc. when she had inquiries. Presently, no OPC personnel are served by Evergy and as such do not have account portal access.
- Q. If your recommendation were implemented, do you believe that the same or similar treatment should be afforded to the Commission's Staff?
- Yes, if the Commission Staff wanted such access. A.
- Q. Do you believe the consumers the Office of the Public Counsel represents would support OPC's request of the Company if they understood what the Office is asking and why it is asking for CIS access?
- A. Yes. I have not surveyed Evergy customers as to the question, however, as a customer served by three investor-owned utilities, I would have significant support for the Missouri

See Mo. Rev. Stat. 386.480-.

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

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

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

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

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

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

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

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

- A. No. There was stakeholder input and sharing of ideas in a variety of meetings before Evergy's pilot TOU offering. The introduction of the current report is to offer educational tenets, ideas, and information that might serve to benefit Evergy customers in the Company's future customer educational efforts, including more expansive customer adoption of TOU offerings. We learn as we go along and we learn from the experiences of others. The Arizona report offers Evergy and all stakeholders an opportunity to be introduced to additional educational experience toward improving and building upon the Company's prior TOU customer education.
- Q. What were some findings of interest or considerations in the Arizona evaluation of APS's Customer Education Plan?
- A. There were several areas that were insightful and I will provide a few of them here. The report refers to the Marketing, Education, and Outreach plans developed by the California Utilities as "best practices" as the California TOU experience was most closely aligned at the time with that of Arizona Public Service Company. There were elements of contrast between the APS Customer Education and Outreach Plan compared with the California utility ME&O plans and as mentioned above those may provide useful information and potentially inform future Marketing, Education, and Outreach plans developed in Missouri as rate offerings evolve.

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

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

A key finding in the report was the apparent lack of consumer organization comments being represented in the final version of the Arizona Public Service Company's Plan which may have been contributed to, by what appears to be, a short ten day comment period before the final ME&O was filed. Also noted were messages that focused on "saving" on a plan but the calculations were "not based on promises of saving on lower future electricity 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.

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

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

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

Q. What other aspects of the report were striking?

A. The recommendation that the utility Customer Education Plan should be comprehensive in 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.

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

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

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

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

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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/ 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 140.7410 kWh at \$0.00089 per kWh Subtotal Raytown Franchise Fee Raytown City Sales Tax @ 2% Current Charges

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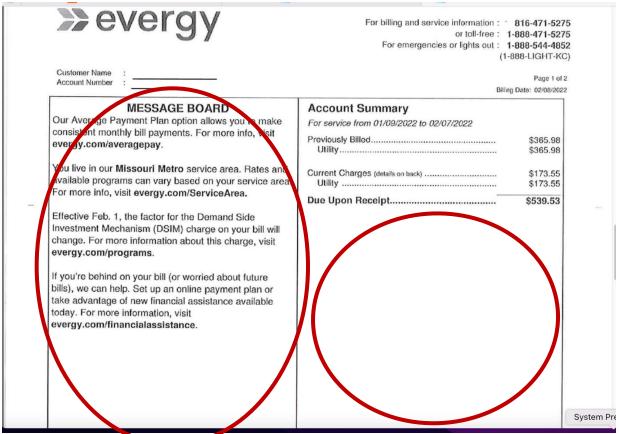
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Does there appear to be an opportunity to provide definitions of the acronyms Q. described above somewhere on the bill?

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

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

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



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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- **Q.** Please summarize your recommendations in this case.
 - A. 1. That Evergy work with the Missouri Office of the Public Counsel to provide the OPC with anonymous or simulated CIS customer account access.
 - 2. That Evergy review the report, "An Evaluation of Arizona Public Service Company's Customer Education And Its Implementation" for its applicability toward enhancing Evergy's customer education efforts presently and in the future.
 - 3. That Evergy seek to provide as much bill clarity as possible by spelling out technical acronyms on customer bills and avoiding their use for terms such as: Fuel Adjustment Charge, Renewable Energy Standard Rate Adjustment, Demand Side Investment Mechanism, etc. Further, that Evergy seek opportunities to provide definitions of the above terms directly on customer bills in space available.
 - Q. Does this conclude your testimony?
- 13 A. Yes.

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