

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

In the Matter of Requests for Customer Account Data Production)
Account Data Production)

File No. EO-2024-0002

PROPOSED PROCEDURAL SCHEDULE

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by counsel, and presents the following procedural schedule on behalf of Staff. This timeline is appropriate. In further support, Staff states as follows:

1. The Commission entered its Order Approving Four Partial Stipulations and Agreements in File Nos. ER-2022-0129 and ER-2022-0130 (“Stipulation Order”), effective October 2, 2022, approving the “Stipulation and Agreement” dated August 30, 2023. That Stipulation and Agreement included a provision at page 12 in which Evergy Metro, Inc. d/b/a Evergy Missouri Metro (EMM) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (EMW) (collectively, “Evergy”) committed as follows:

4) Data Retention: a) Prior to July 1, 2023, the Company will identify and provide the data requested in the direct testimony of Sarah Lange.¹ If the requested data is not available or cost-prohibitive to

¹ The referenced direct testimony of Sarah Lange described the following discrete pieces of data:

1. Identify and provide the data required to determine: line transformer costs and expenses by rate code; primary distribution costs and expenses by voltage; secondary distribution costs and expenses by voltage; primary voltage service drop costs and expenses; line extension costs, expenses, and contributions by rate code and voltage; and meter costs by voltage and rate code;
2. For each rate code, provide the total number of customers served on that rate schedule on the first day of the month and the last day of the month;
 - a. For each rate schedule on which customers may take service at various voltages, the number of customers served at each voltage on the first day of the month and the last day of the month;
3. For each rate code, the number of customers served on that rate schedule on the first day of the month and the last day of the month for which interval meter readings are obtained;
 - a. For each rate code on which customers may take service at various voltages, the number of customers served at each voltage on the first day of the month and the last day of the month which interval meter readings are obtained;
4. For each rate code for which service is available at a single voltage, the sum of customers’ interval meter readings, by interval;
 - a. For each rate code on which customers may take service at various voltages, the sum of customers’ interval meter readings, by interval and by voltage;

produce, the Company will file a motion to establish an EO docket. In that docket the Company will provide the reason why it cannot provide the requested data and its individual estimate of the cost to provide each set of requested data, for the further consideration of the parties and the Commission.

2. Plainly, to the extent Evergy was unable to provide the data it committed to provide, Evergy should have filed its Direct Testimony on July 1, 2023, explaining exactly which discrete items of data it is unable to provide, why it is unable to provide that data, and its estimate of the cost to provide that data. On July 7, 2023, Evergy filed its *Motion to Establish Docket for Further Consideration of Data Production*, in this case. This filing did not include any direct testimony, nor did its *Motion* include “the reason why

5. If any internal adjustments to customer interval data are necessary for the company’s billing system to bill the interval data referenced in parts 4. and 4.a., such adjustments should be applied to each interval recording prior to the customers’ data being summed for each interval;

6. From time to time the Commission may designate certain customer subsets for more granular study. If such designations have been made, the information required under parts 1 – 5 should be provided or retained for those instances.

7. Individual customer interval data shall be retained for a minimum of fourteen months. If individual data is acquired by the Company in intervals of less than one hour in duration, such data shall be retained in intervals of no less than one hour.

8. Evergy shall:

a. Retain individual hourly data for use in providing bill-comparison tools for customers to compare rate alternatives.

b. Retain coincident peak determinants for use in future rate proceedings.

c. Provide to Staff upon request:

1) the information described in part 1;

2) a minimum of 12 months of the data described in parts 2-5;

3) for rate codes with more than 100 customers, a sample of individual customer hourly data, and identified peak demands for those 100 customers in the form requested at that time (i.e. monthly 15 minute non-coincident, annual 1 hour coincident);

4) for rate codes with 100 or fewer customers, individual customer hourly data, and identified peak demands for those customers in the form requested at that time (i.e. monthly 15 minute non-coincident, annual 1 hour coincident).

d. For purposes of general rate proceedings, Evergy shall provide all data described above for a period of not less than 36 months, except that Staff does not request individual customer data for 36 months except as described in part 8.c.3.

9. Develop the determinants for assessment of an on-peak demand charge to replace the current monthly billing demand charge, and for potential implementation for customers not currently subject to a demand charge; and

10. EMM and EMW begin to retain and study data related to the reactive demand requirements of each rate code, and sample customers within each rate code.

it cannot provide the requested data and its individual estimate of the cost to provide each set of requested data, for the further consideration of the parties and the Commission,” as Evergy committed to do in the August 2022 Stipulation and Agreement.

3. Among the information Evergy committed to provide in the August 2022 Stipulation and Agreement (or to explain why it could not provide that information and its cost estimate to provide that information) is information necessary to determine the amount of energy sold in each hour to its customers by rate plan.

4. It is critical that Evergy make clear why it cannot provide this information and to provide its estimate of cost to obtain this information for further consideration of the parties and the Commission at the earliest possible instance – as Evergy’s counterparties to the August 2022 Stipulation and Agreement bargained for Evergy to make a good faith effort to retain this data by July 1, 2023.

5. It is necessary that this data be retained at the earliest possible instance because currently, Evergy cannot provide hourly customer usage levels for its General Use rate plans separate from its Space Heating rate plans separate from its various time-based rate plans.

6. Evergy has communicated to Staff and other stakeholders that it cannot go back to capture data from its billing system. The best practice to establish future determinants is to examine multiple years of data. Evergy’s failure to begin the retention of this data is effectively depriving the Commission and Staff of the opportunity to rely on robust customer usage data for setting overall revenue requirements and setting of individual rates on various rate plans. Until Evergy programs its billing system to retain the data, data will continue to be lost and unavailable for use.

7. Based on the foregoing, Staff presents the following procedural schedule:

<u>Item</u>	<u>Date</u>
Direct Testimony (By Evergy) To “provide the reason why it cannot provide the requested data and its individual estimate of the cost to provide each set of requested data, for the further consideration of the parties and the Commission.”	October 1, 2023
DR response time = 5 business days	
Rebuttal Testimony (By Staff, OPC, MEIC, MECG)	November 1, 2023
Surrebuttal and Cross Surrebuttal Testimony	December 1, 2023
List of Issues	December 6, 2023
Settlement Discussions	December 7-8, 2023
Position Statements or Last Day to File Settlement	December 15, 2023
Evidentiary Hearing	December 19-21, 2023
Transcripts	2024
Initial Briefing (Staff & Evergy)	2024
Reply Briefing (Staff & Evergy)	2024

WHEREFORE, Staff requests the Commission to set this procedural schedule as outlined above, and order the parties to comply with it.

Respectfully submitted,

/s/ Carolyn H. Kerr

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Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 20th day of September, 2023, to all counsel of record.

/s/ Carolyn H. Kerr