BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Requests for Customer Account Data Production from Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West	))))	**File No. EO-2024-0002**

STAFF'S RESPONSE TO EVERGY'S RESPONSE TO STAFF'S MOTION TO COMPEL

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Response to Evergy's Response to Staff's Motion to Compel,* states as follows:

1. On January 3, 2024, Staff filed a *Motion to Compel* following a discovery conference and after sending multiple data requests to Evergy relating to multiple issues in the above-captioned case.

2. On January 10, 2024, Evergy filed its *Response to Motion to Compel* ("*Response*"). That filing included, at page 6, beginning at paragraph 17, a section Evergy titled "List of Relevant Issues in this Case." In it, Evergy states, "From the Company perspective, the issues in this case are straightforward," and provides the following theoretical issues list:

a. Should the Commission order Evergy to create, prepare and produce the data requested in the direct testimony of Staff witness Sarah Lange in File Nos. ER-2022-0129 and ER-2022-0130 as detailed in witness Lange's direct testimony on p. 62, ln. 1 through p. 64, ln. 28?

b. Should the Company expend the cost to create, and produce the data requested by Staff?

c. If the Commission orders the creation and production of the data requested by Staff, should the Commission also order the deferral of all costs of creation, preparation, and production for possible recovery in a future rate case?

3. In fact, the issues in this case, as outlined by Staff in its January 17, 2024 filing,[1] center around the August 2022 Stipulation's threshold issues of whether Evergy provided the reason(s) why it cannot provide the requested data, and what Evergy's individual estimate of the cost is to provide each set of requested data.

4. Evergy's *Response* at page 9, paragraph 26, states, in pertinent part, as follows:

> another very important principle of discovery that is particularly relevant to this proceeding is that a public utility is not required to create documents that do not exist or perform analysis of data that has not been performed. If the Company does not have the document or has not performed the analysis, the Commission has not expected it to somehow create it. Much of the Staff's discovery falls into this category.

5. This point is, in fact, addressed in the rebuttal testimonies of Staff experts J Luebbert and Sarah Lange, and is addressed in their recommendations that "this docket remain open for resolution of discovery disputes related to data provision."

6. Specifically, Staff recommends this docket be used as a means to resolve areas where Evergy asserts that it cannot provide requested data because production of this data would require Evergy to perform additional analysis to provide required data in a usable format,"[2] and Staff's recommendation that "this docket be used as a means to resolve areas where Evergy asserts that it cannot provide requested data because

[1] See, Staff's *List of Issues, Order of Opening Statements, List and Order of Witnesses, and Order of Cross-Examination* which it filed in EO-2024-0002 on January 17, 2024.
[2] Luebbert rebuttal, page 4.

production of this data would require Evergy to perform additional analysis. Some analysis of distribution system costs must occur at some point."[3]

7. Staff recognizes that Evergy has not done an analysis of its distribution system costs since the mid-1990's. Thus, producing information to study distribution system costs will require Evergy to provide data that Evergy does not itself use to study distribution system costs. The Evergy *Response* acknowledges that, "Mr. Lutz has suggested in his direct testimony that alternative data could be used to establish rates in the future that would be readily available and cost-effective. However, no specific 'alternative data' was specified in Mr. Lutz's testimony."[4] Ms. Lange's recommendation to use this docket to house discovery related to this "alternative data," some of which will undoubtedly require analysis that Evergy has not preemptively performed.

8. As stated in Staff's *Motion to Compel* at page 3:

> b. For the following DRs, the information requested by Staff is information that is (a) properly discoverable, (b) necessary to evaluate the reasonableness of the "alternative data" that Evergy witness Brad Lutz references in his testimony, and (c) necessary to discuss the reasonableness and cost-effectiveness of other data alternatives to compare to the cost of the data Evergy did provide in its direct testimony. Specifically, those DRs are listed as follows:
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> i. For EMM, DRs 10, 12, 13, 14, 18, 19, 27, 30, 31, 34, 35, 38, 39, 40, 43, 44, 48, 49, 52, 53, 56, 60, 61, 64, 65, 66, 67, 69, 70, 73, 74, 75, and 77;
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> ii. For EMW, DRs 81, 83, 84, 85, 89, 90, 98, 101, 102, 105, 106, 110, 111, 114, 115, 119, 120, 123, 124, 127, 131, 132, 135, 136, 137, 138, 140, 141, 144, 145, 146, and 148.[5]

[3] Lange rebuttal, page 18.
[4] Evergy Response at page 12, paragraph 33.
[5] Because it is anticipated that details of distribution system costs that would be provided in response would vary by utility, Staff directed identical data requests to Evergy Missouri Metro and Evergy Missouri West. This fact is relevant to Evergy's repeated concerns with the quantity of data requests submitted in this case.

9. Examples of specific data requests that Staff understands would require Evergy to perform an analysis it has not performed are provided below, and are intended to elicit the sort of alternative data that Evergy offered to provide in satisfaction of the first provision of its data commitments.

a. DRs 31 and 102, which are substantively identical and request that each Evergy utility "Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected Poles at each of the three most common heights, and 20 random poles at each of the next three most common heights and determine the voltages at which each pole supports operations;"

b. DRs 35 and 106 which request that Evergy "Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected segments of underground conduit, and determine the voltages at which it supports operations;"

c. DRs 39 and 110, requesting Evergy "Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected segments of overhead conductor operating at each of the most common voltages served, and determine which retirement units or plant characteristics are utilized;"

d. and DRs 40 and 111, which requested that Evergy "Please identify the number of working hours Evergy MISSOURI METRO anticipates would be

The subject data request questions are attached to this pleading and incorporated herein by reference as ATTACHMENT A..

required to determine how many miles of overhead conductor operate at each of the most common voltages served, and determine which retirement units or plant characteristics are utilized."

10. Continued discovery of these and related items is the subject of Ms. Lange's recommendation to use this docket for continued exploration of alternative data to perform a distribution cost study. The responses to these data requests are necessary for Staff, and the Commission, to evaluate whether it is reasonable for the Commission to order Evergy to undertake the sampling analyses referenced in these data requests.

11. Concerning the data requests listed in Staff's Motion to Compel in paragraphs 8.a.i. and 8.a.ii., most or all of these DRs are directly tied to the central issues of this case as directly stated in Staff's *List of Issues*, and are at least indirectly acknowledged in Evergy's competing *List of Issues*, filed by Evergy on January 17, 2024.[6]

a. As examples, DRs 7 and 78 asked "What is Evergy MISSOURI METRO's estimate of the cost to estimate line transformer cost and expenses by rate code?" This DR should not have been necessary, as the answer to this question should have been explicitly stated in Evergy's direct testimony.

b. Similarly, DRs 16 and 87 asked "What is Evergy MISSOURI METRO's estimate of the cost to estimate primary distribution system costs and expenses associate with its underground system by rate code?"

[6] Staff inadvertently included DRs 9 and 80, which were adequately responded to. The DRs listed in paragraphs 8.a.i. and 8.a.ii. are attached to this pleading and incorporated herein by reference as ATTACHMENT B.

c. DRs 17 and 88 asked, “What is Evergy MISSOURI METRO's estimate of the cost to estimate primary distribution system costs and expenses associate with its overhead system by rate code?”

d. These and the related requests are relevant to this case, in that the answers to these questions should have been provided in Evergy’s direct testimony in this case.

12. In the Commission-approved *Stipulation*, Evergy committed to prepare estimates of the cost to provide any of the information that it was unable to provide by July 1, 2023. It would be nonsensical to claim that Evergy is relieved of its obligation under the Commission-approved Stipulation by virtue of receipt of a Staff data request to provide the information that it failed to provide in its direct testimony in this case.

WHEREFORE, for the reasons set forth above, Staff hereby submits its *Response to Evergy’s Response to Staff’s Motion to Compel* and respectfully requests the Commission compel Evergy to respond to the data requests provided in Attachments 1 and 2, and for any other such orders as the Commission sees just and reasonable under the circumstances.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, on this 19th day of January, 2024, to all counsel of record.

/s/ Carolyn H. Kerr

Data Requests Listed in Paragraph 8.b.i. and ii.

Metro #	West #	Question
10	81	For account 368, please provide Evergy MISSOURI METRO's gross plant, depreciation reserve, net plant, and depreciation expense for each year 2013 - 2023, year-end balance, or most current balance available for the current year. (b) Please provide annual expense recorded to account 595 maintenance of line transformers, for each year 2013 - 2023 as of year-end, or the most current value available for the current year. (c) Please provide the portion of annual expense recorded to each, separately, account 583 overhead line expenses and 584 underground line expenses, associated with line transformers, for each year 2013 - 2023 as of year-end, or the most current values available for the current year.
12	83	(a) Please provide the number of line transformers on Evergy MISSOURI METRO's system, based on its continuing property record, for each year 2013 - 2023 as of year-end, or the most current values available for the current year. (b) For each other system in which the quantity of operating line transformers on Evergy MISSOURI METRO's system is contained, for each year 2013 - 2023 as of year-end, or the most current values available for the current year, please provide the quantity of operating line transformers. (c) For each other system in which the quantity of warehoused or stored line transformers on Evergy MISSOURI METRO's system is contained, for each year 2013 - 2023 as of year-end, or the most current values available for the current year, please provide the quantity of warehoused or stored line transformers.
13	84	(a) Please identify the number of line transformers that are currently in operation that provide service to more than one customer account. (b) Please identify the number of line transformers that are currently in operation that provide service exactly one customer account. (c) Please identify the number of line transformers that are currently in operation that provide service to between two and five customer accounts. (d) Please identify the number of line transformers that are currently in operation that provide service to between six and ten customer accounts. (e) Please identify the number of line transformers that are currently in operation that provide service to more than 20 customer accounts. (f) If the number of customer accounts served by line transformers is not known, please identify the information that Evergy MISSOURI METRO would need to obtain to determine that information, and define which system(s) that information is stored in. (g) Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected line transformers to determine the number of customers served, retirement unit of transformer, and rate schedule of customers served.

14	85	(a) How many line transformers have been installed by Evergy MISSOURI METRO in each year 2018 - 2023? (b) What is the most frequently installed line transformer installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential customers in a subdivision? Please provide physical description, retirement unit name, and average cost per unit per year. (c) What is the most frequently installed line transformer installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential single family customers not in a subdivision? Please provide physical description, retirement unit name, and average cost per unit per year. (d) What is the most frequently installed line transformer installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential multi-family customers with less than 5 meters. Please provide physical description, retirement unit name, and average cost per unit per year. (e) What is the most frequently installed line transformer installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential multi-family customers with more than 5 but less than 15 meters. Please provide physical description, retirement unit name, and average cost per unit per year. (f) What is the most frequently installed line transformer installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential multi-family customers with more than 15 meters. Please provide physical description, retirement unit name, and average cost per unit per year. (g) What are the five most frequently installed line transformers installed by Evergy MISSOURI METRO in each year 2018 - 2023 for stand-alone commercial customers receiving single phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common line transformers, please describe those characteristics. (h) What are the five most frequently installed line transformers installed by Evergy MISSOURI METRO in each year 2018 - 2023 for stand-alone commercial customers receiving multi-phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common line transformers, please describe those characteristics. (i) What are the five most frequently installed line transformers installed by Evergy MISSOURI METRO in each year 2018 - 2023 for stand-alone industrial customers receiving single phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common line transformers, please describe those characteristics. (j) What are the five most frequently installed line transformers installed by Evergy MISSOURI METRO in each year 2018 - 2023 for stand-alone industrial customers receiving multi-phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common line transformers, please describe those characteristics. (k) What are the five most frequently installed line transformers installed by Evergy MISSOURI METRO in each year 2018 - 2023 for multiple commercial customers sharing a line transformer receiving single phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common line transformers, please describe those characteristics.(l) What are the five most frequently installed line transformers installed by Evergy MISSOURI METRO in each year 2018 - 2023 for multiple

		commercial customers sharing a line transformer receiving multi-phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common line transformers, please describe those characteristics. (m) What are the five most frequently installed line transformers installed by Evergy MISSOURI METRO in each year 2018 - 2023 for multiple industrial customers sharing a line transformer receiving single phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common line transformers, please describe those characteristics. (n) What are the five most frequently installed line transformers installed by Evergy MISSOURI METRO in each year 2018 - 2023 for multiple industrial customers sharing a line transformer receiving multi-phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common line transformers, please describe those characteristics.
18	89	For accounts 360 (Land and land rights), 361 (Structures and improvements), 362 (Station Equipment), 363 (Energy storage equipment - distribution), 364 (poles, towers, and fixtures), 365 (overhead conductors and devices), 366 (underground conduit), 367 (underground conductors and devices), and 371 (installations on customers' premises) separately, please provide Evergy MISSOURI METRO's gross plant, depreciation reserve, net plant, and depreciation expense for each year 2013 - 2023, year-end balance, or most current balance available for the current year.
19	90	For each distribution maintenance and each distribution operation account, provide annual expense recorded for each year 2013 - 2023 as of year-end, or the most current value available for the current year.
27	98	For accounts 369.1 (overhead services) and 369.2 (underground services), separately, please provide Evergy MISSOURI METRO's gross plant, depreciation reserve, net plant, and depreciation expense for each year 2013 - 2023, year-end balance, or most current balance available for the current year.

30	101	(a) Please provide the number of Poles on Evergy MISSOURI METRO's system, based on its continuing property record, for each year 2013 - 2023 as of year-end, or the most current values available for the current year. (b) For any data set other than the continuing property record which contains information concerning the number of in-service Poles on Evergy MISSOURI METRO's system, provide the number in service, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (c) For any data set other than the continuing property record which contains information concerning the number of stored or warehoused Poles, provide the number stored or warehoused, for each year 2013 - 2023 as of yearend, or the most current values available for the current year.
31	102	Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected Poles at each of the three most common heights, and 20 random poles at each of the next three most common heights and determine the voltages at which each pole supports operations.
34	105	(a) Please provide the number of feet of Underground conduit on Evergy MISSOURI METRO's system, based on its continuing property record, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (b) For any data set other than the continuing property record which contains information concerning the number of feet of in-service Underground conduit on Evergy MISSOURI METRO's system, provide the number in service, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (c) For any data set other than the continuing property record which contains information concerning the number of feet of stored or warehoused Underground conduit, provide the number stored or warehoused, for each year 2013 - 2023 as of yearend, or the most current values available for the current year.
35	106	Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected segments of underground conduit, and determine the voltages at which it supports operations.
38	109	(a) Please provide the number of feet of Overhead conductor on Evergy MISSOURI METRO's system, based on its continuing property record, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (b) For any data set other than the continuing property record which contains information concerning the number of feet of in-service Overhead conductor on Evergy MISSOURI METRO's system, provide the number in service, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (c) For any data set other than the continuing property record which contains information concerning the number of feet of stored or warehoused Overhead conductor, provide the number stored or warehoused, for each year 2013 - 2023 as of yearend, or the most current values available for the current year.

39	110	Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected segments of overhead conductor operating at each of the most common voltages served, and determine which retirement units or plant characteristics are utilized.
40	111	Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to determine how many miles of overhead conductor operate at each of the most common voltages served, and determine which retirement units or plant characteristics are utilized.
43	114	Please provide the number of feet of Underground conductor on Evergy MISSOURI METRO's system, based on its continuing property record, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (b) For any data set other than the continuing property record which contains information concerning the number feet of in-service Underground conductor on Evergy MISSOURI METRO's system, provide the number in service, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (c) For any data set other than the continuing property record which contains information concerning the number of feet of stored or warehoused Underground conductor, provide the number stored or warehoused, for each year 2013 - 2023 as of yearend, or the most current values available for the current year.
44	115	Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected segments of underground conductor operating at each of the most common voltages served, and determine which retirement units or plant characteristics are utilized.
48	119	(a) Please provide the number of Overhead devices on Evergy MISSOURI METRO's system, based on its continuing property record, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (b) For any data set other than the continuing property record which contains information concerning the number of in-service Overhead devices on Evergy MISSOURI METRO's system, provide the number in service, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (c) For any data set other than the continuing property record which contains information concerning the number of stored or warehoused Overhead devices, provide the number stored or warehoused, for each year 2013 - 2023 as of yearend, or the most current values available for the current year.
49	120	Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected Overhead devices, and determine the voltages at which it supports operations.

52	123	(a) Please provide the number of Underground devices on Evergy MISSOURI METRO's system, based on its continuing property record, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (b) For any data set other than the continuing property record which contains information concerning the number of in-service Underground devices on Evergy MISSOURI METRO's system, provide the number in service, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (c) For any data set other than the continuing property record which contains information concerning the number of stored or warehoused Underground devices, provide the number stored or warehoused, for each year 2013 - 2023 as of yearend, or the most current values available for the current year.
53	124	Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected Underground devices, and determine the voltages at which it supports operations.
56	127	(a) Please provide the number of the locations at which distribution infrastructure operating at a primary voltage utilized by a single customer occurs on Evergy MISSOURI METRO's system. (b) Please identify Evergy MISSOURI METRO's estimate of the number of customer locations at which distribution infrastructure operating at a primary voltage is utilized by a single customer. (c) Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected locations where distribution infrastructure operates at a primary voltage utilized by a single customer, and determine the associated property units and quantities. (d) What is the name and title of the Evergy MISSOURI METRO employee or contractor most familiar with the distribution infrastructure operating at a primary voltage utilized by a single customer selected for new installation of distribution infrastructure operating at a primary voltage utilized by a single customer? (e) What is the name and title of the Evergy MISSOURI METRO employee or contractor most familiar with the distribution infrastructure operating at a primary voltage utilized by a single customer selected for replacement installation of distribution infrastructure operating at a primary voltage utilized by a single customer?
60	131	(a) For account 370 (meters) and each subaccount, separately, please provide Evergy MISSOURI METRO's gross plant, depreciation reserve, net plant, and depreciation expense for each year 2013 - 2023, year-end balance, or most current balance available for the current year. (b) Please provide annual expense recorded to account 586 (meter expenses) and any subaccounts, separately, for each year 2013 - 2023 as of yearend, or the most current value available for the current year. (c) Please provide annual expense recorded to account 596 (maintenance of meters) and any subaccounts, separately, for each year 2013 - 2023 as of yearend, or the most current value available for the current year.
61	132	Is Evergy able to identify meter costs by voltage? If so, please provide the meter costs by voltage for Evergy MISSOURI METRO as of July 1, 2023, and as of November 1, 2023.

64	135	(a) Please provide the number of meters on Evergy MISSOURI METRO's system, based on its continuing property record, for each year 2013 - 2023 as of yearend, or the most current values available for the current year. (b) For each other system in which the quantity of operating meters on Evergy MISSOURI METRO's system is contained, for each year 2013 - 2023 as of yearend, or the most current values available for the current year, please provide the quantity of operating meters. (c) For each other system in which the quantity of warehoused or stored meters on Evergy MISSOURI METRO's system is contained, for each year 2013 - 2023 as of yearend, or the most current values available for the current year, please provide the quantity of warehoused or stored meters.
65	136	(a) By retirement unit name and physical characteristics, which meters currently in service at Evergy MISSOURI METRO are capable of obtaining reactive demand readings? (b) By retirement unit name and physical characteristics, which meters currently in service at Evergy MISSOURI METRO are not capable of obtaining reactive demand readings? (c) For which rate codes at Evergy MISSOURI METRO can Evergy MISSOURI METRO's billing system obtain and retain reactive demand readings?
66	137	(a) Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected commercial customers to determining the retirement unit of the meter.(b) Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected industrial customers to determining the retirement unit of the meter. (c) Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected residential customers to determining the retirement unit of the meter.

67	138	(a) How many meters for new service have been installed by Evergy MISSOURI METRO in each year 2018 - 2023? (b) What is the most frequently installed meter installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential customers in a subdivision? Please provide physical description, retirement unit name, and average cost per unit per year. (c) What is the most frequently installed meter installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential single family customers not in a subdivision? Please provide physical description, retirement unit name, and average cost per unit per year. (d) What is the most frequently installed meter installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential multi-family customers with less than 5 units. Please provide physical description, retirement unit name, and average cost per meter per year. (e) What is the most frequently installed meter installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential multi-family customers with more than 5 but less than 15 units. Please provide physical description, retirement unit name, and average cost per meter per year. (f) What is the most frequently installed meter installed by Evergy MISSOURI METRO in each year 2018 - 2023 for residential multi-family customers with more than 15 units. Please provide physical description, retirement unit name, and average cost per meter per year. (g) What are the five most frequently installed meters installed by Evergy MISSOURI METRO in each year 2018 - 2023 for stand-alone commercial customers receiving single phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common meters, please describe those characteristics. (h) What are the five most frequently installed meters installed by Evergy MISSOURI METRO in each year 2018 - 2023 for stand-alone commercial customers receiving multi-phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common meters, please describe those characteristics. (i) What are the five most frequently installed meters installed by Evergy MISSOURI METRO in each year 2018 - 2023 for stand-alone industrial customers receiving single phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common meters, please describe those characteristics. (j) What are the five most frequently installed meters installed by Evergy MISSOURI METRO in each year 2018 - 2023 for stand-alone industrial customers receiving multi-phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common meters, please describe those characteristics. (k) What are the five most frequently installed meters installed by Evergy MISSOURI METRO in each year 2018 - 2023 for multiple commercial customers sharing a line transformer receiving single phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common meters, please describe those characteristics. (l) What are the five most frequently installed meters installed by Evergy MISSOURI METRO in each year 2018 - 2023 for multiple commercial customers sharing a line transformer receiving multi-phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer

		characteristics associated with selection of those five most common meters, please describe those characteristics.(m) What are the five most frequently installed meters installed by Evergy MISSOURI METRO in each year 2018 - 2023 for multiple industrial customers sharing a line transformer receiving single phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common meters, please describe those characteristics. (n) What are the five most frequently installed meters installed by Evergy MISSOURI METRO in each year 2018 - 2023 for multiple industrial customers sharing a line transformer receiving multi-phase service. Please provide physical descriptions, retirement unit names, and average cost per unit per years. If there are customer characteristics associated with selection of those five most common meters, please describe those characteristics.

69	140	(a) Is Evergy MISSOURI METRO currently capable of providing the total number of customers served on any given rate code on the first day of the month and the last day of the month? (b) Please identify the rate codes for which Evergy MISSOURI METRO can provide the total number of customers served on the first day of the month and the last day of the month. (c) Please identify the rate codes for which Evergy MISSOURI METRO cannot provide the total number of customers served on the first day of the month and the last day of the month. (d) Is Evergy MISSOURI METRO currently capable of providing, by rate code, the total number of customers served on the first day of each applicable billing cycle and the last day of each billing cycle? (e) Please identify the rate codes for which Evergy MISSOURI METRO can provide, by rate code, the total number of customers served on the first day of each applicable billing cycle and the last day of each billing cycle. (f) Please identify the rate codes for which Evergy MISSOURI METRO cannot provide, by rate code, the total number of customers served on the first day of each applicable billing cycle and the last day of each billing cycle. (g) For each rate code for which Evergy MISSOURI METRO can provide the information, please provide, by rate code, the total number of customers served on the first day of each applicable billing cycle and the last day of each billing cycle, for each applicable billing cycle, for the billing months of July 2023 and October 2023. Please specify billing cycle dates. (h) What is Evergy MISSOURI METRO's estimate of the cost to provide the total number of customers served on any given rate code on the first day of the month and the last day of the month?
70	141	(a) Is Evergy MISSOURI METRO currently capable of providing the total number of customers served on any given rate code that are billed based on AMI metering versus non-AMI metering? (b) Please identify the rate codes for which Evergy MISSOURI METRO can provide the total number of customers that are billed based on AMI metering versus non-AMI metering. (c) Please identify the rate codes for which Evergy MISSOURI METRO cannot provide the total number of customers that are billed based on AMI metering versus non-AMI metering. (d) For each rate code for which Evergy MISSOURI METRO can provide the information, please provide the total number of customers served billed based on AMI metering versus non-AMI metering for the calendar month of July 2023, the calendar month of October 2023, the billing month of July 2023, and the billing month of October 2023. (d) What is Evergy MISSOURI METRO's estimate of the cost to provide the total number of customers served on any given rate code that are billed based on AMI metering versus non-AMI metering? (e) What is Evergy MISSOURI METRO's estimate of the cost to provide the total number of customers served on any given rate code that are billed based on AMI metering versus non-AMI metering, at each voltage at which service is available on that rate code?

73	144	(a) Using 15 minute interval data to establish customer NCP, for each Evergy MISSOURI METRO rate code, please provide the sum of customer NCP by rate code for each month of 2021, 2022, and 2023 where NCP is measured between the hours of 6 am and 8 pm only. (b) Using 15 minute interval data to establish customer NCP, for each Evergy MISSOURI METRO rate code, please provide the sum of customer NCP by rate code for each month of 2021, 2022, and 2023 where NCP is measured between the hours of 6 am and 10 am only. (c) Using 15 minute interval data to establish customer NCP, for each Evergy MISSOURI METRO rate code, please provide the sum of customer NCP by rate code for each month of 2021, 2022, and 2023 where NCP is measured between the hours of 2 pm and 9 pm only. (d) What is Evergy MISSOURI METRO's estimate of the cost to provide, using 15 minute interval data to establish customer NCP, for each Evergy MISSOURI METRO rate code, the sum of customer NCP by rate code for each month of 2021, 2022, and 2023 where NCP is measured between the hours of 2 pm and 9 pm only?
74	145	(a) Please provide for each rate code 100 individual customers' hourly data for the years 2021, 2022, and 2023. If a given rate code has less than 100 customers, please provide this information for each customer on that rate code. (b) What is Evergy MISSOURI METRO's estimate of the cost to provide for each rate code 100 individual customers' NCP based on 15 minute hourly data for each month in the years 2021, 2022, and 2023, separately, for each of the following time periods (1) 6 am - 8 pm; (2) 6 am and 10 am; and (3) 2 pm and 9 pm?
75	146	(a) Please identify the annual 15 minute NCP of each customer on each rate code for each month of each year 2021, 2022, and 2023. Please provide only the following information regarding these NCPs at this time: (1) the sum of NCPs by month by rate code. (2) the cumulative frequency of NCP by month by rate code in tranches of 2 MW for residential and small general rate codes, and (3) the cumulative frequency of NCP by month by rate code in tranches of 20 MW for rate codes other than residential, small general service, and lighting. (b) What is Evergy MISSOURI METRO's estimate of the cost to identify the annual 15 minute NCP of each customer on each rate code for each month of each year 2021, 2022, and 2023?
77	148	“Bright lines”: (1) Please confirm that Evergy MISSOURI METRO has stated an intention to pursue "bright lines" demarcation of its rate codes and/or rate schedules. (2) Please fully explain what is meant by Evergy MISSOURI METRO's "bright lines," demarcations. (3) Please provide Evergy MISSOURI METRO's "bright lines" demarcations that are currently under consideration by customer NCP or other applicable defining characteristic.

Data Requests Listed in Paragraph 8.a.i. and ii.

Metro #	West #	Question
7	78	What is Evergy MISSOURI METRO's estimate of the cost to estimate line transformer cost and expenses by rate code?
11	82	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify line transformer costs by rate code? (b) In Evergy MISSOURI METRO's opinion what data is necessary to identify line transformer expenses by rate code? (c) In what systems are the data necessary to identify line transformer costs by rate code stored? (d) In what systems are the data necessary to identify line transformer expenses by rate code stored?
16	87	What is Evergy MISSOURI METRO's estimate of the cost to estimate primary distribution system costs and expenses associate with its underground system by rate code?
17	88	What is Evergy MISSOURI METRO's estimate of the cost to estimate primary distribution system costs and expenses associate with its overhead system by rate code?
20	91	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify primary distribution costs by rate code? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify primary distribution operations expenses by rate code? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify primary distribution maintenance expenses by rate code? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify primary distribution costs by rate code?
21	92	What is Evergy MISSOURI METRO's estimate of the cost to estimate secondary distribution system costs and expenses associated with its underground system by rate code?
22	93	What is Evergy MISSOURI METRO's estimate of the cost to estimate secondary distribution system costs and expenses associated with its overhead system by rate code?
23	94	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify secondary distribution costs by rate code? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify secondary distribution operations expenses by rate code? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify secondary distribution maintenance expenses by rate code? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify secondary distribution costs by rate code?

24	95	(a) What is Evergy MISSOURI METRO's estimate of the cost to estimate primary voltage service drop costs and expenses associated with its underground system by rate code? (b) What is Evergy MISSOURI METRO's estimate of the cost to estimate primary voltage service drop costs and expenses associated with its overhead system by rate code? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify primary voltage service drop costs by rate code? (d) In Evergy MISSOURI METRO's opinion, what data is necessary to identify primary voltage service drop operations expenses by rate code? (e) In Evergy MISSOURI METRO's opinion, what data is necessary to identify primary voltage service drop maintenance expenses by rate code?
25	96	In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify primary voltage service drop costs by rate code?
26	97	What is Evergy MISSOURI METRO's estimate of the cost to estimate service drop costs and expenses by rate code?
28	99	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify line extension costs and contributions by rate code? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify line extension operations expenses by rate code? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify line extension maintenance expenses by rate code? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify line extension costs and contributions by rate code?
29	100	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Poles costs by voltage? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Poles operations expenses by voltage? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Poles maintenance expenses by voltage? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify Poles costs, operations expenses, and maintenance expenses by voltage?
33	104	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground conduit costs by voltage? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground conduit operations expenses by voltage? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground conduit maintenance expenses by voltage? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify Underground conduit costs, operations expenses, and maintenance expenses by voltage?
37	108	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Overhead conductor costs by voltage? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Overhead conductor operations expenses by voltage? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Overhead conductor maintenance expenses by voltage? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify Overhead conductor costs, operations expenses, and maintenance expenses by voltage?

42	113	In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground conductor costs by voltage? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground conductor operations expenses by voltage? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground conductor maintenance expenses by voltage? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify Underground conductor costs, operations expenses, and maintenance expenses by voltage?
45	116	Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to determine how many miles of underground conductor operate at each of the most common voltages served, and determine which retirement units or plant characteristics are utilized.
47	118	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Overhead devices costs by voltage? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Overhead devices operations expenses by voltage? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Overhead devices maintenance expenses by voltage? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify Overhead devices costs, operations expenses, and maintenance expenses by voltage?
51	122	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground devices costs by voltage? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground devices operations expenses by voltage?(c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify Underground devices maintenance expenses by voltage? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify Underground devices costs, operations expenses, and maintenance expenses by voltage?
55	126	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify the costs associated with distribution infrastructure operating at a primary voltage utilized by a single customer? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify the operations expenses associated with distribution infrastructure operating at a primary voltage utilized by a single customer? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify the maintenance expenses associated with distribution infrastructure operating at a primary voltage utilized by a single customer? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify the costs, operations expenses, and maintenance expenses associated with distribution infrastructure operating at a primary voltage utilized by a single customer?

57	128	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify the costs associated with distribution infrastructure operating at a secondary voltage utilized by a single customer not recorded to a services or line transformer account? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify the operations expenses associated with distribution infrastructure operating at a secondary voltage utilized by a single customer not recorded to a services or line transformer account? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify the maintenance expenses associated with distribution infrastructure operating at a secondary voltage utilized by a single customer not recorded to a services or line transformer account? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify the costs, operations expenses, and maintenance expenses associated with distribution infrastructure operating at a secondary voltage utilized by a single customer not recorded to a services or line transformer account? (e) Please provide the number of the locations at which distribution infrastructure operating at a secondary voltage utilized by a single customer occurs on Evergy MISSOURI METRO's system, where such infrastructure is not recorded to a services or line transformer account. (f) Please identify Evergy MISSOURI METRO's estimate of the number of customer locations at which distribution infrastructure operating at a primary voltage is utilized by a single customer, where such infrastructure is not recorded to a services or line transformer account. (g) Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected locations where distribution infrastructure operates at a secondary voltage utilized by a single customer, and determine the associated property units and quantities.
58	129	(a) In Evergy MISSOURI METRO's opinion, what data is necessary to identify the costs associated with transmission or subtransmission infrastructure utilized by a single customer not recorded to a services or line transformer account? (b) In Evergy MISSOURI METRO's opinion, what data is necessary to identify the operations expenses associated with transmission or subtransmission infrastructure utilized by a single customer not recorded to a services or line transformer account? (c) In Evergy MISSOURI METRO's opinion, what data is necessary to identify the maintenance expenses associated with transmission or subtransmission infrastructure utilized by a single customer not recorded to a services or line transformer account? (d) In Evergy MISSOURI METRO's opinion, which systems contain the data that is necessary to identify the costs, operations expenses, and maintenance expenses associated with transmission or subtransmission infrastructure utilized by a single customer not recorded to a services or line transformer account? (e) Please identify the number of working hours Evergy MISSOURI METRO anticipates would be required to survey 100 randomly selected locations where transmission or subtransmission infrastructure is utilized by a single customer, and determine the associated property units and quantities. (f) Please identify Evergy MISSOURI METRO's estimate of the number of customer locations at which transmission or subtransmission infrastructure is utilized by a single customer.
59	130	(a) What is Evergy MISSOURI METRO's estimate of the cost to estimate meter costs and expenses by rate code? (b) For each Evergy MISSOURI METRO rate code, please identify the voltages at which customers may be served, and the number of customers served at each voltage as of July 1, 2023, July 31, as of October 1, 2023, and as of October 31, 2023.

62	133	Is Evergy able to identify meter costs by rate code? If so, please provide the meter costs by rate code for Evergy MISSOURI METRO as of July 1, 2023, and as of November 1, 2023.
63	134	(a) In Evergy's opinion what data is necessary to identify meter costs by voltage and rate code? (b) In what systems are the data necessary to identify meter costs by voltage and rate code stored?
71	142	(a) For which rate codes is Evergy MISSOURI METRO capable of producing the sum of customer usage for each of 8,760 hours in a year for those customers who are AMI metered? (b) Separately for each Evergy MISSOURI METRO rate code, provide Evergy MISSOURI METRO's estimate of the cost to become capable of producing the sum of customer usage for each of 8,760 hours in a year for those customers who are AMI metered?
72	143	(a) Does Evergy MISSOURI METRO retain individual customer interval data for a minimum of fourteen months in intervals of no less than one hour? If so, for which customers?(b) Separately for each Evergy MISSOURI METRO rate code, provide Evergy MISSOURI METRO's estimate of the cost to become capable of retaining individual customer usage for each of 8,760 hours in a year for those customers who are AMI metered? (c) Does Evergy MISSOURI METRO retain individual customer interval data for use in providing bill-comparison tools for customers to compare rate alternatives? If so, for which customers? (d) What is Evergy MISSOURI METRO's estimate of the cost to retain individual customer interval data for use in providing bill-comparison tools for customers to compare rate alternatives?