The Empire District Electric Company d/b/a Liberty
Case No. ER-2024-0261
Missouri Public Service Commission Data Request - 0191.3

Data Request Received: 2025-05-12 Response Date: 2025-05-30
Request No. 0191.3 Witness/Respondent: Candice Kelly
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**REQUEST:**

1. In response to DR 191.1, the Company indicated that it plans to automate the exception process for AMI interval/register reads, and give customers the presumption of the off-peak rates for missing intervals ("Method 1"). In response to DR 191.2, the Company indicated that it implemented a similar process to what was used in the legacy CIS for missing intervals in March 2025, i.e., customers are billed on-peak and off-peak rates proportionate to their known usage ("Method 2"), but the process is not yet fully automated. a. Please clarify whether Method 1 or Method 2 will be used by the Company going forward once the process is fully automated. b. Which method was in use for each of the following time periods? If multiple methods were in use, or an alternative method was in use during any of these time periods, please explain: • June 2022-April 2024 • April 2024-March 2025 • March 2025-present c. Please provide the target date of completion for the automating process, or the date completed.

2. According to page 9 (paragraph 25) of the Report Regarding Customer First Implementation filed in case EE-2024-0232, AMI network meters were updated to allow a one-day look forward and look back in response to storm and power outages to collect missing readings. Is this measure still in place? If so, please explain why there are still missing interval reads that are creating exceptions.

3. How long is AMI interval data currently stored in meters? Have there been any changes to the storage duration since the installation of AMI meters? If so, please provide the changes made and the dates.

**RESPONSE:**

1. a. Method 2 is in use now and will be used going forward. The un-accounted for interval usage will be allocated according to the on/off peak based on the known interval percentage of the whole.

b. June 2022 – Apr 2024: Method 2 is what was in place and used during this time (CustomerWatch).

April 2024 – Mar 2025: Combination of Method 1 and manual calculation.

Mar 2025 – Present: Method 2 is what was implemented and is being used by SAP.

c. Automation was completed May 6, 2025.

2. We have adjusted the system to only look back and not forward. The system is configured to be able to look back two days for a register read. There is a 2-step process for TOU reads. Step 1 is the request of the register read. If the read isn't available, it will look back one, then two days for an actual register read. If the read two days ago was the only one available, it will send back the read as well as the date. Step 2: once SAP receives the register read from IEE, it sends a time series request based on the read date that was returned. Those intervals are used in the calculation of the On and Off-peak values and then returned to SAP.

With the look forward in place, in the case of the outage, if the read from one day after was available and used, there would be missing intervals that would/could cause an exception in the IEE system (MDUS 2). There could always be missing intervals even if there wasn't a widespread outage (e.g., a single meter outage, poor communication, etc.). We have also adjusted other settings to automatically attempt re-collection after a meter has not been communicating and starts communicating again to help alleviate/correct these common occurrences.

3. The meter can store 45 – 60 days of interval data depending on the amount of registers.

There have been no changes to the storage duration. The storage in the meter is a physical hardware limitation and cannot be adjusted.