Exhibit No.:
Issue(s): Estimated Billing/Missing Intervals; Miscellaneous Tariff Issues
Witness: Randall Jennings
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: ER-2026-00143
Date Testimony Prepared: August 11, 2026

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

REBUTTAL TESTIMONY

OF

RANDALL JENNINGS

EVERGY METRO, INC. d/b/a Evergy MISSOURI METRO

CASE NO. ER-2026-0143

Jefferson City, Missouri
August 2026

** Denotes Confidential Information **

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CASE NO. ER-2026-0143

REBUTTAL TESTIMONY

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RANDALL JENNINGS

EVERGY METRO, INC. d/b/a EVERGY MISSOURI METRO

CASE NO. ER-2026-0143

Q. Please state your name and business address.

A. My name is Randall Jennings, 200 Madison Street, Jefferson City, Missouri 65101.

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

A. I am employed by the Missouri Public Service Commission ("Commission") as a Senior Research and Data Analyst for the Tariff/Rate Design Department, in the Industry Analysis Division.

Q. Are you the same Randall Jennings that filed Direct Testimony on June 30, 2026?

A. Yes.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to further address Evergy Missouri Metro's ("EMM") practice of estimated billing, missing-interval data estimation, data retention by EMM related to that process, and to identify items in the current tariff filing to be addressed.

CUSTOMER NOTIFICATION OF ESTIMATED BILL

Q. Your direct testimony indicated that a certain percentage of data intervals has to be "estimated" before the customer's bill is identified by EMM as being "estimated."

A. Yes. If 33% of all data intervals contained in the billing period are made up of "estimated" data, the bill is flagged as "estimated"[1] and the customer's bill contains a notice that "this is an estimated read."[2] A customer's bill could contain up to 33% of its intervals containing estimated data and the customer would not know it.

Q. Is EMM required to maintain any information why estimated data is being used in the calculation of customer bills?

A. Yes, "a utility shall maintain accurate records of the reasons for the estimated bill and all efforts made to secure an actual reading."[3]

Q. Was EMM able to provide these records regarding customer bills identified as "estimated?"

A. No, EMM does not track this information.[4] The lack of information provided raises serious concerns with the accuracy of billing determinants provided by EMM in this case.

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[1] Company response to Staff Data Request 0219.
[2] Company response to Staff Data Request 0427.
[3] See 4 CSR 240-13.020 Billing and Payment Standards.
[4] Company response to Staff Data Request 0219.5.

ESTIMATED BILLING THRESHOLD

Q. Your direct testimony discussed when the “estimated” interval data inserted differs from the “scalar usage“ (the difference between known meter readings before and after the missing interval) and that difference exceeds the error threshold (±33 kWh), a billing exception is created for EMM’s billing department to review. Has EMM provided any additional information?

A. Yes. The error threshold of ±33 kWh is for the entire billing period, not a single interval. An error threshold of that size for the billing period is better than having an error threshold of that size for each interval. But this error threshold allows any customer’s billed usage to be ±32 kWh different from their actual usage for the billing period. “The MDM takes the total interval usage for the current billing period and compares it to the total scalar usage for the current billing period and if the difference is less than ±33 kWh the MDM will process it as a normal bill.”[5]

Q. Did Staff attempt to determine the possible impact of this error threshold?

A. Yes. Staff’s calculations are a deliberate worst-case analysis in that it assumes every bill not manually reviewed was inaccurate by the maximum amount of ±32 kWh permitted below the review threshold. The resulting figures do not represent demonstrated or probable billing errors; they simply illustrate the outer limit of possible exposure under EMM’s current process. A more accurate estimation or evaluation is not possible because EMM has not maintained records of the inaccuracy. EMM stated that from October 2024 through June 15, 2026, (20.5 months) there have been 15,365 error

[5] Company response to Staff Data Request 0219.4.

threshold reviews.[6] This is an approximate average of approximately 750 reviews per month. Between June 1, 2024 and December 31, 2025, (17 months) 6,351,230 bills were sent by EMM.[7] This is an approximate average of 373,601 bills sent per month. The result is a possible average of 372,851 bills per month that contains ±32 kWh billed incorrectly.

If EMM were to maintain these averages continuing forward, these 372,851 monthly bills, whose actual usage differs from the billed usage by ±32 kWh, could result in ±11,931,232 kWh/month being billed inaccurately without adjustment or notification to EMM customers.

Q. Has Staff attempted to determine a possible dollar impact from EMM allowing up to 32 kWh to be billed incorrectly without adjustment?

A. Yes. As previously discussed, EMM's billing system and MDM system only identifies bills for correction if the "scalar" and "estimated" usage differ by ±33 kWh or more. As a result, any customer bill could contain data intervals, comprised of estimated data with varying degrees of accuracy and if the difference between the "scalar" usage and the sum of the billed intervals is 32 kWh or less, no correction will take place.

Staff used the final billing determinants and revenue for the Residential rate class calculated in workpapers submitted by Staff witness Kim Cox. Staff selected determinant data for the five rate schedules that make up 99.79% of the Residential customers and include differentials for time of use. Staff multiplied the number of customer bills by 32 to determine an amount of kWh that could be billed incorrectly

[6] Company response to Staff Data Request 0219.3.
[7] Company response to Staff Data Request 0219.

without correction. Staff then examined the Residential Class rate differences between "on-peak" and "off-peak" charges. Table 1 below is a deliberate worst-case analysis to provide the outer limit of exposure under EMM's current process and illustrates the possible impact if each Residential customer in the selected Residential Class rate codes has 32 kWh billed incorrectly each month through "estimated" intervals.

Table 1: Possible Determinant and Revenue Impact of 32 kWh billed in error

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[redacted]

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The result of customers in each of the Residential Class rate codes listed in Table 1 being billed up to 32 kWh incorrectly without review or correction, could have an impact from zero to approximately $292,326.00 per month or $3.5 million annually.[8]

ESTIMATED BILLING ADJUSTMENTS ACROSS ALL INTERVALS

Q. Your direct testimony discussed whether EMM's current tariff process accounts for estimated usage data differences across time intervals when different rates could be a factor. Has EMM provided additional information regarding this process?

[8] Jennings schedule RJ-r1.

A. Yes. EMM provided an example of a random customer's bill for a period that the sum of the usage for all intervals (which may or may not have contained "estimated" data) was different from the "scalar usage" during the same billing period.[9] The difference between the "scalar usage" and the sum of the intervals was 36.7542 kWh which would have caused the customer's bill to create a billing exception for EMM's billing department to review. This amount of difference (36.7542 kWh) was then divided by the "scalar usage" (1,188.2514 kWh) to determine the percentage of error. In the example provided, the difference was 3.09% of the total "scalar usage" for the selected billing period.[10]

Q. Does EMM identify and maintain a record of intervals that have "estimated" data inserted so that those specific intervals can be adjusted?

A. No, EMM does not maintain records of specific intervals that are comprised of "estimated" data.[11] The 3.09% difference between "scalar usage" and the sum of the intervals is applied to every interval; either increasing or decreasing each interval's usage so that the adjusted sum of the intervals equals the total "scalar usage".

Q. How could this affect customers' bills when different rates are applied to different intervals of usage?

A. Hypothetically, a customer's usage data for a more expensive period could be accurate while "estimated" usage entered during a less expensive period was

[9] EMM does not maintain records of "estimated" interval data that has been inserted. As a result, Staff cannot verify whether or not the billing information in question contains "estimated" data.
[10] Company response to Staff Data Request 0219.4.
[11] Company response to Staff Data Request 0219.2.

underestimated. When the intervals for the billing period are totaled and the sum of the intervals is less than the "scalar usage," an upward adjustment will be made to every interval; including the more expensive intervals which previously contained accurate usage data. The customer would in effect be penalized by EMM's lack of data and its current adjustment procedure.

Q. Has Staff attempted to determine the actual impact of these across the board adjustments to all data intervals instead of to only the "estimated" intervals?

A. No, due to the lack of detailed information from EMM, Staff cannot begin to calculate the actual impact of the adjustments. EMM has stated that from October 2024 through June 15, 2026, 15,365 bills have had manual reviews conducted by EMM staff but EMM is unable to provide the amount of adjustment in kWh or dollars to any of those bills.[12]

If you assume a customer enrolled in the TOU-2 rate code had 100 kWh misallocated, during the Summer period, from the off-peak rate to the higher priced on-peak rate, the monthly bill impact would be $28.75.[13]

Q. Can Staff say with any degree of certainty whether the amounts of usage provided by EMM are correct or billed in the correct amounts during rate periods?

A. No. Staff cannot confirm that the information is accurate due to EMM not keeping detailed records of "estimated" usage being inserted into customer records. As Staff currently understands EMM's process of bill adjustments, if the sum of usage for all

[12] Company response to Staff Data Request 0219.3.
[13] Jennings schedule RJ-r1.

intervals within a billing period differs from the "scalar" usage from known meter readings by 33 kWh or more, a manual adjustment is performed across all intervals within the billing period. Without accounting for the specific intervals in which estimated data is inserted and instead, distributing adjustments across all intervals within a billing period, EMM is inserting more inaccuracy into customer bills and determinants that may or may not contain accurate data.

Q. Can Staff provide an example of this potential inaccuracy and its impact?

A. Staff finds a flaw with EMM's policy in that there could potentially be multiple "estimated" intervals within the billing period that contain erred data to each extreme end of the spectrum but in effect balance each other out so that the sum of the intervals is within EMM's established thresholds that would not raise any type of red flag. For example, take the hypothetical customer listed earlier that had 100 kWh misallocated. If the sum of the intervals was within 32 kWh of the "scalar" usage and as long as there were fewer than approximately 950[14] estimated intervals, the customer would not be notified that their bill was based upon any "estimated" usage, EMM would have no record of or reason to examine the discrepancy, but the customer's bill would be in error by $28.75.

[14] Using 96 15-minute intervals in each 24-hour period and assuming a 30-day billing period. Company response to Staff Data Request 0427 stated if 33% of all data intervals in a billing period are made up of estimated data, a customer is notified "this is an estimated read."

Q. Do other companies handle "estimated" usage differently?

A. Yes. Union Electric Company, d/b/a Ameren Missouri ("Ameren MO") has responded to Staff inquiries in ER-2026-0291.[15] Below is a comparison:

Topic	EMM	Ameren MO
Threshold to identify a bill as "estimated."	33% or more of all data intervals in a billing period contain "estimated" data.	If more than 1% of interval data for a billing period is missing or estimated.
What difference between "scalar" usage and "estimated" usage triggers a manual review.	If the difference is 33 kWh or more for the billing period.	If a daily validation variance exceeds 4 kWh.
Process to resolve the difference between "scalar" and "estimated."	All intervals in billing period are adjusted by the same percentage.	Manual validation by attempting to retrieve actual meter readings. If estimated is used, only applied to the missing interval(s).

Q. What does Staff recommend concerning the estimated interval process EMM uses going forward?

A. Staff recommends that the Commission Order EMM to:

1. Continue attempting to obtain missing interval data and to adjust customer bills when actual data becomes available;
2. Maintain records of missing intervals, inserted estimated usage, the data supporting each estimate, and the circumstances requiring estimation; and
3. Identify bills containing estimated usage and report to the Commission and Staff the level of usage and revenue being estimated.

[15] See schedule RJ-2 for ER-2026-0291 Company responses to Staff Data Requests 0243, 0245, and 0246.

4. File an application for Commission approval, a tariff that addresses interval estimation procedures including testimony and analysis that justifies the process.

    a. The proposed tariff procedures should avoid alteration of actual interval reads in determining customer bills.

    b. The proposed tariff procedures should provide thresholds for automated and manual estimation, thresholds for identifying customer bills that include estimated intervals, and potential bill revision processes.

MISCELLANEOUS TARIFF ISSUES

Q. Did EMM have substantive changes to tariff sheets that it did not discuss in testimony?

A. Yes. EMM did not provide testimony supporting all its tariff changes in direct testimony due to the volume of those changes. Instead, EMM filed a letter with the Commission dated February 6, 2026, stating that because of the full withdrawal of PSC Mo. No. 2 to be replaced by PSC Mo. No. 3. EMM would provide a workpaper to guide Staff to the location in the new Rules & Regulations that covers the current Rule & Regulation sections. One result of this process was the creation of an “error log” created and maintained by EMM to record tariff language issues and recommended corrections. This “error log” is a work in progress that Staff and EMM are monitoring.

Q. Does Staff have concerns with any proposed changes to EMM's existing tariff language?

A. Yes. Staff has concerns about some proposed language additions and/or revisions. Attached as schedule RJ-r3 is a portion of the "error log" that contains a list that, as of August 7, 2026, will need to be addressed. The "error log" is a work-in-progress. Staff may add or remove items that need additional review.

Q. Does Staff have concerns with any proposed changes to EMM's existing tariff language that are not addressed or listed in the "error log" provided by EMM on August 6, 2026?

A. Yes. The following items are not listed in the "error log" that Staff recommends being changed:

1. The new table of contents on tariff sheet R-TOC-1.01 lists multiple paragraphs incorrectly, including 2.11 as "Discontinuance of Service." The new tariff sheet R-2.06 lists paragraph 2.11 as "Waiver." Staff recommends the table of contents be changed to reflect "Discontinuance of Service" as 2.12.
2. There are multiple mentions of discontinuance of service in accordance with Section 2.05 (or a subparagraph thereof) on several tariff sheets. Section 2.05 in currently listed as "Temporary Service." Staff recommends changing references to 2.05 for discontinuance of service to reflect Section 2.12.
3. Paragraph 3.04 "Indemnity to Company" contains the sentence "...distribution and use of electricity by the customer..." Section 1

containing definitions does not list “electricity” but does provide a definition for “electric service.” “Indemnity to Company” in EMM’s current tariff in uses the term “electric service” in place of “electricity.” Staff recommends changing “electricity” to “electric service.”

4. Paragraph 2.05 “Temporary Service” refers to applications being considered as a “special contract.” Staff recommends the removal of the word “special” and that EMM specify that the “temporary service” will be charged at the applicable permanent service.

5. Staff recommends that EMM update all rate sheets and the net margin rate in accordance with Commission orders pursuant to this case.

Staff recommends the Commission to order EMM to make the changes listed above along with any changes contained within the “error log” in its compliance filing in accordance with this case.

Q. Does other Staff address tariff changes in their testimony?

A. Yes, Tammy Huber’s rebuttal testimony addresses tariff changes as well.

Q. Does this conclude your rebuttal testimony?

A. Yes it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's Request for Authority to Implement a General Rate Increase for Electric Service	))))	Case No. ER-2026-0143

AFFIDAVIT OF RANDALL T. JENNINGS

STATE OF MISSOURI	)	
	)	ss.
COUNTY OF COLE	)	

COMES NOW RANDALL T. JENNINGS and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony Randall T. Jennings*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

Randall T. Jennings

RANDALL T. JENNINGS

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 6th day of August 2026.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2029
Commission Number: 12412070

D. Suzie Mankin

Notary Public

Case No. ER-2026-0143

INFORMATION CONTAINED IN

SCHEDULE RJ-r1

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Ameren Missouri's
Response to MPSC Data Request - MPSC
ER-2026-0291
In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service

No.: MPSC 0243

1.) Define “estimated reading,” “estimated bill,” (as used in Ameren Missouri’s tariff sheets 131 through 131.2) and all conditions or situations that would cause a customer’s bill to be identified as “estimated.” 2.) How is the absence of interval data identified? 3.) Is there a threshold of missing interval data that initiates the estimated billing process? If so, please explain what that threshold entails, who established the threshold, how was this threshold determined to be reasonable, and when was the current threshold established? If there have been previous thresholds for missing interval data, please provide the threshold amounts, the effective dates for each threshold, who made the decision for each change, and the rationale for each change. 4.) When estimated interval data spans multiple rate periods (i.e. peak and off peak), how is the estimated power usage distributed between the rate periods? What is that distribution based upon? Have there been previous distribution methods? If so, provide the date ranges, distribution methods, and reasons for any changes. 5.) Is there a threshold of missing interval data that causes a customer bill to be identified as “estimated”? If so, is that threshold different than in part (3) above and if yes, what is the threshold, who established the threshold, how was this threshold determined to be reasonable, and when was the current threshold established? If there have been previous thresholds, please provide the threshold amounts, effective dates for each threshold, who made the decision for each change, and the rationale for each change. Requested by: Randall Jennings (randall.jennings@psc.mo.gov <mailto:randall.jennings@psc.mo.gov>)

RESPONSE

Prepared By: Clark Allen
Title: Director, Digital Smart Metering
Date: 2026-07-29

1. **Estimated Reading** – An estimated reading is a meter reading value used for billing when the Company's metering and billing systems do not have an actual meter reading available. In those circumstances, the Company's systems generate an estimated value using established estimation routines.

   Estimated Bill – An estimated bill is a bill generated using estimated meter reading data that meets the criteria described below. When a bill is identified as estimated, the bill includes a message notifying the customer that the bill was estimated.

Conditions and Situations – For accounts billed using register readings, the bill for the applicable billing period is identified as estimated when the Company lacks an actual start read at the beginning of the billing period or an actual end read at the end of the billing period and either value was estimated.
For accounts billed using interval readings, the bill is identified as estimated when more than 1% of interval readings for the billing period are missing or estimated.

2. The absence of interval data is identified systemically by the Company's metering and billing systems when expected interval reads are not present for the applicable billing period.

3. Yes. If more than 1% of interval data for a billing period is missing or estimated, the Company's billing system identifies the bill as an estimated bill. The current threshold is applied systemically as part of the Company's billing process.

4. When estimated interval data spans multiple rate periods, the Company's interval estimation routines allocate usage across the applicable rate periods based on the interval profile generated by those routines. As a result, estimated usage is assigned to the peak and off-peak periods in which the estimated intervals occur, rather than being applied as a single aggregate amount outside of the applicable rate periods.

5. Yes. The threshold for identifying an interval-billed customer bill as estimated is the same threshold described in response to part 3. If more than 1% of interval data for the billing period is missing or estimated, the Company's billing system identifies the bill as an estimated bill.

Ameren Missouri's
Response to MPSC Data Request - MPSC
ER-2026-0291
In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service

No.: MPSC 0245

1.) Please explain the procedure currently being used to estimate missing interval data. If the procedure is an automated process, please identify circumstances that would lead to a manual process to calculate estimated interval data. 2.) When the estimated interval data is greater or less than the difference between the known meter readings before and after the missing interval, what amount of kWh would cause an "error threshold" resulting in a manual review? 3.) Please identify when the threshold identified in part two (2) of this data request was established and whether there have been changes since its establishment, identifying the dates and the employee title responsible for such decisions. 4.) If the estimated interval data (kWh) inserted is not equal to the difference between the known meter readings before and after the missing interval, but is less than the "error threshold" identified in part two (2) of this data request, when and how is that amount of kWh reconciled in that billing period or future billing periods? Requested by: Randall Jennings (randall.jennings@psc.mo.gov <mailto:randall.jennings@psc.mo.gov>)

RESPONSE

Prepared By: Clark Allen
Title: Director, Digital Smart Metering
Date: 2026-07-29

1. Interval estimation is generally an automated process performed within the Company's metering and billing systems. Validation, Estimation, and Editing (VEE) processes run multiple times per day in the Company's Meter Data Management System (MDM). As part of that process, estimated reads are generated when interval data or register data is missing. When valid register readings are available, interval usage is estimated between the available register readings.

   Manual review may be required in limited circumstances, including situations where a meter is not communicating, actual meter data cannot be retrieved through normal system processes, or system validations identify a condition that requires additional review before estimated interval data is finalized. These scenarios are identified through the Company's billing and metering processes and are worked by the Customer Accounts Department (CAD), as appropriate.

2. As part of the validation process within the Company's metering and billing systems, daily validations compare the sum of interval readings to the difference between the applicable register readings. If the variance exceeds 4 kWh, the account is flagged for manual review and validation. In general, such discrepancies are associated with missing interval data. Before estimation is applied, a work item is created to attempt to retrieve the actual reading from the meter.

3. The 4 kWh threshold was established in 2020 in connection with the Company's Smart Meter Program and the broader deployment of advanced metering infrastructure. The Company is not aware of any changes to that threshold since it was established.

4. In general, validations occur before estimations within the MDM. Accordingly, the 4 kWh threshold is used to identify instances where interval data may be missing or otherwise require review; it is not used to calculate the estimated interval data itself. Once the applicable issue is addressed—such as by retrieving the actual read or clearing the validation condition—the MDM attempts to estimate any remaining missing interval data. As a result, reconciliation occurs through the validation and estimation process before the billing data is finalized, rather than through a separate use of the 4 kWh threshold for estimation.

Ameren Missouri's
Response to MPSC Data Request - MPSC
ER-2026-0291
In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service

No.: MPSC 0246

1.) When a customer bill includes data that is derived from estimated interval data, is there a notation on the bill stating the billed amount has been calculated using estimated data? If there is a notation, how much detail is provided to the customer, e.g., why is the data being estimated, which intervals (dates/times) have been estimated, time of use rates inserted as estimates and/or any other detail or notation provided in customer bills? Please provide samples of each type of customer notification regarding estimated billing. 2.) Is there a percentage of total data contained within the billing period, or threshold, that is estimated, that would cause the bill notation? Please provide that threshold if one exists. Requested by: Randall Jennings (randall.jennings@psc.mo.gov <mailto:randall.jennings@psc.mo.gov>)

RESPONSE

Prepared By: Clark Allen
Title: Director, Digital Smart Metering
Date: 2026-07-29

1. Yes. When a customer bill is based on estimated interval data and meets the estimated bill criteria described in response to part 2, a message appears on the first page of the bill stating: "This bill is based on an estimated reading. We will adjust any differences when we obtain the next actual meter reading." In addition, each bill includes a table that provides the meter number, meter reading, reading type, and other related billing details. When the applicable criteria are met, the reading type is identified as "estimated."

2. Yes. A bill is generally treated as an estimated bill, and the estimated bill notation is included, when more than 1% of the interval data for the billing period is estimated.

Case No. ER-2026-0143

INFORMATION CONTAINED IN

SCHEDULE RJ-r3

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