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Case No.:	ER-2026-0143
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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. ER-2026-0143

REBUTTAL TESTIMONY

OF

JULIE DRAGOO

ON BEHALF OF

EVERGY MISSOURI METRO

Kansas City, Missouri
August 2026

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REBUTTAL TESTIMONY

OF

JULIE DRAGOO

CASE NO. ER-2026-0143

I. INTRODUCTION AND EXECUTIVE SUMMARY

Q. Please state your name and business address.

A. My name is Julie Dragoo. My business address is 1200 Main, Kansas City, Missouri 64105.

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

A. I am employed by Evergy Metro, Inc. and serve as Vice President, Customer Operations for Evergy Metro, Inc. d/b/a as Evergy Missouri Metro ("Evergy Missouri Metro"), Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West"), Evergy Metro, Inc. d/b/a Evergy Kansas Metro ("Evergy Kansas Metro"), and Evergy Kansas Central, Inc. and Evergy South, Inc., collectively d/b/a as Evergy Kansas Central ("Evergy Kansas Central") the operating utilities of Evergy, Inc.

Q. On whose behalf are you testifying?

A. I am testifying on behalf of Evergy Missouri Metro ("EMM").

Q. What are your responsibilities?

A. As the Vice President of Customer Operations, I am responsible for the meter to cash operations of Evergy including Metering, Billing, Payments and Collections, as well as the Contact Centers. In addition, I lead the teams who support Evergy billing and metering systems and data analytics.

Q. Please describe your education, experience and employment history.

A. I hold an Executive Masters of Business Administration from University of Missouri – Kansas City and a Bachelor of Science in Business in Finance from Emporia State University. I have been with Evergy and predecessor companies since October 2000 and have served in many capacities in the customer service organization since 2003. I've led large customer projects, managed Contact Center Operations, as well as Metering and Field Service and Revenue Management teams. I established the current system support team for customer systems as well as the project delivery team for this organization.

Q. Have you previously testified in a proceeding at the Missouri Public Service Commission ("MPSC" or "Commission") or before any other utility regulatory agency?

A. Yes. I provided testimony in File No. EO-2022-0002, 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.

Q. What is the purpose of your testimony?

A. The purpose of my rebuttal testimony is to respond to criticisms from Staff witness Randall Jennings concerning estimated billing procedures. I will describe Evergy's billing and customer service performance, including our metering and interval data practices and the governance that supports them. My testimony, as well as the Rebuttal Testimony of Brad Lutz collectively demonstrates that Evergy provides reliable service consistent with MPSC regulations and our approved tariffs. In addition, I will discuss the customer-facing benefits provided through the Uplight platform and the timing of those benefits specifically for Missouri customers.

Q. Have you reviewed the testimony from Staff witness Randall Jennings?

A. Yes, I have. Mr. Jennings has several concerns with EMM's estimated billing, EMM's procedure for estimating bills, how bills are identified to be estimated by EMM's system, the alleged lack of information provided by EMM, and the impact estimated bills may have on rates. While Mr. Jennings raises questions regarding Evergy's interval estimation methodology, I believe it is important to evaluate those concerns in the context of Evergy's overall billing performance and actual experience of our customers.

Q. Why is customer experience relevant when evaluating estimated billing practices?

A. The primary objective of any meter data management and billing system is to provide customers with accurate and timely bills. Therefore, the best measure of whether a billing process is functioning appropriately is not simply whether estimation occurs, but whether customers receive accurate bills, receive them on time, and experience minimal billing issues requiring correction.

Q. Why are you addressing these topics in this case?

A. Billing accuracy and customer service have received heightened attention in Missouri. I want to provide the Commission with a clear, data-supported record of Evergy's actual performance so that the Commission can evaluate our request with full confidence in the reliability of our billing operations. Rather than wait for these questions to be raised, I am presenting our performance metrics, our processes, and our governance practices directly.

Q. Do you agree with the recommendations made by Staff witnesses?

A. I agree with portions of Mr. Jennings' recommendations. As discussed by EMM witness Brad Lutz, I agree that the Company should continue to follow its Commission-approved tariff for non-interval estimates and update the tariff language, as appropriate, to reflect current interval estimation practices used to produce accurate customer bills. I also agree that Evergy should continue its current practice of using the best available meter data when billing customers.

However, I do not believe additional requirements to track the specific circumstances resulting in every interval estimation or to separately quantify the revenue impacts of estimated intervals are necessary. Evergy already maintains substantial meter and interval data, including information identifying estimated meter reads. The data in my testimony proves that estimated billing impacts only a very small percentage of customer bills. As a result, the additional reporting proposed by Staff would provide limited benefit while increasing administrative burden.

Overall, I support recommendations that improve tariff clarity and transparency while allowing the Company to remain focused on timely and accurate billing using the best available customer data.

II. ESTIMATED BILLS AND BILL CORRECTIONS

Q. Is bill estimation an unusual event within utility operations?

A. No. All utilities using advanced metering infrastructure ("AMI") experience occasional communications issues, delayed meter transmissions, network interruptions, meter failures, or other circumstances that may result in temporarily unavailable interval data or a more sustained meter issue that drives a need for estimation. As a result, validation, estimation, and editing processes are standard functions of modern utility meter data management systems. Evergy's systems were designed with those industry-standard operational functions in mind.

Q. Does Evergy estimate customer bills?

A. Yes, and estimation is the rare exception at Evergy. During the period examined in this proceeding, 0.7% of customer bills were identified as estimated. The metrics improve to less than 0.6% for year-to-date 2026. Said differently, more than 99% of Evergy customers' bills were not estimated. This level of performance reflects the effectiveness of Evergy's AMI network, meter communications systems, and billing processes.

Q. What does this tell you about the effectiveness of Evergy's billing processes?

A. EMM's billing processes and systems are operating effectively. The Company's processes successfully obtain and validate billions of interval reads annually, apply estimation only when necessary, perform automated and manual validation checks, and still issue more than 99.5% of bills on schedule. From a customer service perspective, which reflects a stable and reliable process that can be counted on for timely and accurate bills.

Q. Mr. Jennings states this percentage could be larger because the threshold to identify an estimated bill requires more than 33% of interval in a billing period to be estimated. Are you confident EMM's number of estimated bills is accurate?

A. Yes. While the threshold for identifying an estimated bill is more than 33% of the intervals in a billing period, I am confident that EMM's reported number of estimated bills accurately reflects the customer experience.

Although the threshold may appear high, the actual volume of estimated interval data across EMM meters is very low. On an average day, only approximately 0.62% of interval reads require estimation. This indicates that interval estimation is typically not occurring broadly across the meter population.

In practice, customers who exceed the 33% threshold generally experience a sustained meter or communication issue rather than isolated, intermittent missing intervals. For example, when a meter fails or communications are lost, Evergy's monitoring processes detect the issue, it is investigated, and a work order is generated to restore service or replace the meter. Because these issues typically persist until corrective action is completed, the affected customer is likely to accumulate estimated intervals over a meaningful portion of the billing cycle and therefore exceed the 33% threshold.

Conversely, short-duration communication interruptions generally affect only a small number of intervals and are unlikely to cause a customer's bill to be classified as estimated under the tariff. This demonstrates that the 33% threshold appropriately distinguishes between minor, temporary data gaps and situations where estimation materially affects the bill.

It is also important to note that the same 33% threshold applies to standard-rate and commercial customers when daily meter reads are unavailable. Therefore, the threshold is not unique to interval data or time-of-use customers and is applied consistently across customer classes.

Q. Mr. Jennings also questioned the process by which scalar reads and interval reads are validated and compared through the Sum Check process. Can you explain that process and why the threshold was changed in May 2026?

A. Yes. The process Mr. Jennings describes is known as the Sum Check process. At the time of billing, Evergy's Meter Data Management ("MDM") system compares the total usage recorded by the meter's scalar register for the billing period to the sum of the interval usage values for that same period. When the difference between those two values exceeds the established variance threshold, the system generates a billing exception for review that is manually reviewed by Evergy billing personnel and corrected when necessary.

As part of its normal business operations, Evergy periodically evaluates these processes to ensure resources are used efficiently while continuing to provide accurate, reliable service. In late 2025, Evergy analyzed the manual effort required to investigate and resolve Sum Check exceptions and compared that effort to the potential billing impact of small variances. Based on that analysis, effective May 2026 Evergy changed the Sum Check variance threshold from ±18 kWh to ±33 kWh. This change was made solely to better align the cost of manual review with the corresponding billing impact, (variances within ±33 kWh generally carry a lower potential bill impact than the labor cost required to investigate and resolve them), and was not the result of any concern regarding meter accuracy or billing system performance.

Q. It's curious and maybe even confusing that two different thresholds each involve the number thirty-three (33). Can you clarify the distinction between them?

A. Yes. These two thresholds serve entirely different purposes and should not be confused. The first is the 33% estimated-read threshold. This threshold determines whether an individual customer's monthly bill is classified as estimated. This threshold governs how a bill is categorized. The second is the ±33 kWh Sum Check variance threshold. This threshold is a quality-control tool applied at the time of billing. It compares the total usage recorded by the meter's scalar register to the sum of the interval usage values for the same period. When the difference between those two totals exceeds ±33 kWh, the system generates an exception for manual review by Evergy billing personnel. This threshold governs when a bill receives additional human review. The similarity in the number 33 is coincidental and carries no shared analytical meaning.

Q. Does EMM have a history with customers complaining or disputing their estimated bills?

A. No. Since the beginning of 2023, EMM has had four total informal complaints involving estimated billing. One in 2023, three in 2024, and zero since 2025. This matters because customer complaints are often one of the clearest indicators of whether a utility process is creating customer harm.

If Evergy's estimation practices were producing systematic billing inaccuracies, one would reasonably expect to see evidence of customer dissatisfaction through formal complaints, Commission investigations, or recurring billing disputes. The absence of justified formal complaints and the minimum level of informal complaints over the three-year period strongly suggests that customers are not experiencing the types of problems implied by Staff's testimony.

Q. Are you suggesting that because there are very few customer complaints around estimated bills that Evergy's estimation is perfect?

A. No, while estimations have improved over the years with the implementation of new technology and AMI meters/networks, no estimation is perfect. That is why we still identify, measure and communicate to customers when their bill is based on estimated reads. However, Evergy monitors billing quality and customer outcomes and one important metric for that is the frequency of bill corrections.

Q. Are bill corrections a normal part of utility billing?

A. Yes. Bill corrections occur in the normal course of business at any utility. This could be for a variety of reasons, but many relate to updated or previously missing meter data that is received after an initial bill is issued. A correction in this context is a sign that the system is working as designed—identifying and resolving a discrepancy—rather than evidence of a systemic problem.

Q. What is Every's billing correction rate and why is that metric important to this discussion?

A. Evergy's billing correction rate is less than 0.5%. Stated differently, more than 99.5% of bills issued by Evergy do not require a billing correction. This metric is important and is a direct measure of billing accuracy. If Evergy's estimation processes were creating widespread billing inaccuracies, one would expect to see elevated levels of bill corrections. However, the data demonstrates the opposite. More than 99.5% of bills do not require correction after issuance, and that is inclusive of any reason a bill may need corrected, not just for an updated read or incorrect estimation. This is consistent with a billing system that is operating effectively and delivering accurate customer bills.

Q. Mr. Jennings recommends that Evergy continue attempting to obtain missing interval data and adjust customer bills when actual data becomes available. Is that consistent with Evergy's current practice?

A. Yes. Obtaining the most accurate meter data available is a fundamental objective of Evergy's billing processes. When updated meter data becomes available and results in a change to the customer's bill, Evergy has processes in place to review that information and make appropriate billing corrections.

Q. Does the existence of estimated interval data necessarily mean a bill will later be corrected?

A. No. Whether a correction occurs depends on the availability of updated meter data and whether that updated information creates a meaningful difference in the customer's bill. In some instances, initially missing interval data is later received through routine AMI communication processes and can be incorporated into the billing record. In other cases, the missing data is never recovered, and the estimate remains the best available representation of the customer's actual usage.

Q. **How should the Commission evaluate Staff's concerns in light of Evergy's overall billing performance?**

A. The Commission should consider the actual customer outcomes produced by Evergy's billing systems.

The record shows that:

- Less than 1% of customer bills are identified as estimated; thus more than 99% of bills are based on non-estimated billing data
- Less than 0.7% of interval meter reads are estimated on a given day. That is out of over 30 million intervals daily
- More than 99.5% of bills are issued during the customer's normal billing cycle
- More than 99.5% of bills do not require correction after issuance
- Evergy has not experienced a justified formal complaint concerning these estimation practices in the last five years
- Evergy's billing performance demonstrates a strong commitment to

customer service, billing accuracy, and operational excellence. These performance metrics demonstrate that Evergy's billing, validation, and estimation processes are producing highly reliable customer outcomes.

III. BILLING SYSTEM STABILITY, GOVERNANCE AND CUSTOMER DATA

Q. Mr. Jennings states that Evergy could not provide certain information regarding estimated interval data. Does that mean Evergy lacks data concerning its billing and meter operations?

A. No. Evergy maintains extensive meter, interval usage, billing, validation, exception, and system processing data within its MDM and CCB systems. The fact that certain reports requested by Staff were not readily available does not mean the underlying information does not exist. Rather, it reflects that the requested analyses and aggregations are not standard reports maintained in the ordinary course of business.

Q. Please describe the stability of Evergy's billing and meter data management systems.

A. Evergy operates mature, tested billing and meter data management systems that reliably produce timely, accurate bills. Our systems are configured to reflect Missouri-specific rules and our approved tariffs, and they undergo ongoing monitoring through exception reporting and data-validation controls.

Q. Why was Evergy unable to provide some of the information requested by Staff regarding estimated intervals?

A. Many of the requests sought analyses, calculations, or reports that are not routinely created or maintained by Evergy. Evergy's systems are designed primarily to support customer billing, meter data validation, estimation, editing, and operational processes. As a result, while significant detail exists regarding meter reads, interval values, validation results, and billing transactions, the systems are not configured to automatically compile certain regulatory analyses requested during this proceeding.

Q. Does the inability to provide a particular report indicate that Evergy cannot identify when estimation occurs?

A. No. Evergy's MDM system must identify and process estimated reads as part of its normal validation, editing, and estimation functions. The system detects missing or invalid meter data, applies estimation methodologies, when necessary, validates the resulting values, and provides the data used for billing. The issue is not whether Evergy can identify estimated reads. Rather, it is whether the specific summary report or historical analysis requested by Staff exists in a pre-existing format that can be readily extracted and produced. The absence of a particular report does not indicate an absence of the underlying data or system functionality.

Q. How should the Commission view Staff's concern that Evergy could not immediately produce certain estimation-related information?

A. The Commission should recognize the distinction between operational data and aggregated reporting data. Utilities routinely maintain large volumes of operational data that support billing and service functions. There are over 30 million interval reads a day just for Evergy Metro, leading to over 900 million intervals per month that the metering and billing systems manage to drive billing processes for our customers. However, not every conceivable analysis of that data exists as a pre-produced report. In many cases, responding to discovery requests requires the creation of new analyses, specialized queries, or custom data extractions that are not performed in the normal course of business. Consequently, the inability to immediately produce a particular historical aggregation should not be construed as evidence of inaccurate billing, inadequate controls, or unreliable billing determinants. The relevant question is whether Evergy has the data, systems, and controls necessary to accurately bill customers, and the evidence demonstrates that it does.

IV. UPLIGHT

Q: What is the purpose of your testimony regarding Uplight?

A: The purpose of my testimony is to describe the customer-facing benefits provided through the Uplight platform and to identify which customers received those benefits through the separate phases of implementation. My testimony supports the Company's position that the benefits provided through Phase 1 and Phase 2 were not identical in timing or scope.

Q: Please summarize the Uplight platform and the customer benefits it provides.

A: Uplight is a customer engagement platform that supports customer programs and digital interactions, including functionality that helps customers access offerings such as home demand response and marketplace-related services. The platform gives the Company tools to support program enrollment and provide online non-residential energy engagement tools.

Q: Were those benefits provided to all Evergy customers at the same time?

A: No. The Uplight deployment occurred in phases. Phase 1 established the initial Uplight platform for Missouri customers and supported Missouri customer programs and Missouri customer engagement activities through an online marketplace by offering products that included items that were eligible for the MEEIA rebates. Phase 2 expanded the capabilities of the original platform to include online energy engagement tools for Evergy's non-residential customers as well as that same capability to the Kansas jurisdictions.

Q: Which customers received benefits from Phase 1?

A: Phase 1 provided the initial Uplight functionality for Missouri customers only. At that time, the relevant benefits were being provided to Missouri customers, and the online marketplace implementation supported Missouri-specific customer programs and customer engagement capabilities. In fact, at the time of the marketplace implementation in Missouri, there were no corresponding energy efficiency programs in Kansas.

Kansas customers did not receive access to those capabilities simply because Phase 1 existed. Additional implementation work was required before those capabilities could be extended to Kansas customers.

Q: Which customers received benefits from Phase 2?

A: Phase 2 provided benefits across all of Evergy's regulated jurisdictions. Missouri customers received enhanced functionality from the Phase 2 investment, while Kansas customers received initial access to Uplight functionality through that implementation effort.

Q: Why is that phased distinction important?

A: The phased distinction is important because it shows that customers did not all receive the same Uplight benefits at the same time. Missouri customers received the initial platform benefits through Phase 1, while Kansas customers received access only after the Company completed the additional Phase 2 deployment work. Company witness Aron Branson addresses the cost allocation implications of this phased deployment in his supporting testimony.

Q: Has the allocation treatment for Phase 1 been addressed in prior proceedings?

A: Yes. The allocation treatment associated with the original Phase 1 implementation has been raised in a previous proceeding. The Company has consistently explained that Phase 1 supported Missouri-specific customer programs and customer engagement activities, and that the associated benefits were provided to Missouri customers. My testimony here is consistent with those prior explanations and reflects the same underlying facts regarding the Phase 1 deployment.

Q: Has anything changed that would alter the Company's conclusion regarding the appropriate allocation of Phase 1 costs?

A: No. The testimony and supporting evidence continue to demonstrate that the costs associated with Phase 1 were incurred to provide benefits to Missouri customers through Missouri-specific programs and marketplace functionality. Accordingly, the Company continues to support allocating those costs to the customers who received the associated benefits. Company witness Aron Branson addresses the corresponding cost allocation treatment in his testimony.

Q: Does that conclude your 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 JULIE DRAGOO

STATE OF MISSOURI)
) **ss**
COUNTY OF JACKSON)

Julie Dragoo, being first duly sworn on his oath, states:

1. My name is Julie Dragoo. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Vice President, Customer Operations.

2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of Evergy Missouri Metro consisting of fifteen (15) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

Julie Dragoo

Subscribed and sworn before me this 11th day of August 2026.

Notary Public

My commission expires: April 26, 2029

ANTHONY R WESTENKIRCHNER
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 26, 2029
PLATTE COUNTY
COMMISSION #17279952