

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the Application of Evergy Kansas)
Central, Inc. and Evergy Kansas South, Inc. for) Docket No. 20-EKCE-357-TAR
Approval of Customer Forward Program Tariff)
Changes)

**EVERGY KANSAS CENTRAL AND EVERGY KANSAS SOUTH NOTICE OF FILING
SUPPLEMENTAL INFORMATION IN SUPPORT OF APPLICATION**

COME NOW Every Kansas Central, Inc. and Evergy Kansas South, Inc. (together as “Evergy Kansas Central”) (collectively referred to herein as “Evergy” or the “Company”) to file this *Notice of Filing Supplemental Information in Support of Application* (“Notice”) and, in support thereof, state as follows:

1. On February 14, 2020, Evergy Kansas Central filed its *Application for Approval of Tariff Changes to Implement Consolidated Customer Forward Programs* (“Application”) to open this docket.
2. Pursuant to a request from Staff (“Staff”) for the State Corporation Commission of the State of Kansas (“Commission”), Evergy Kansas Central submits supplemental information in support of its Application, attached hereto as **Exhibit A**.

WHEREFORE, the Evergy Kansas Central submits this Notice to the Commission.

Respectfully submitted,

/s/ Cathryn Dinges

Cathryn J. Dinges, #20848
Corporate Counsel
Evergy, Inc.
818 South Kansas Avenue
Topeka, Kansas 66612
Telephone: (785) 575-8344
Cathy.Dinges@evergy.com

COUNSEL FOR EVERGY KANSAS CENTRAL

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above was electronically served, hand-delivered or mailed, postage prepaid, this 2nd day of September 2020 to:

JOSEPH R. ASTRAB
CURB
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
j.astrab@curb.kansas.gov

TODD E. LOVE
CURB
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
t.love@curb.kansas.gov

DAVID W. NICKEL
CURB
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
D.NICKEL@CURB.KANSAS.GOV

SHONDA RABB
CURB
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
s.rabb@curb.kansas.gov

DELLA SMITH
CURB
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
d.smith@curb.kansas.gov

CATHRYN J. DINGES
EVERGY KANSAS CENTRAL, INC
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
Cathy.Dinges@evergy.com

COLE BAILEY
KANSAS CORPORATION
COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
c.bailey@kcc.ks.gov

/s/ Cathryn Dinges

Cathryn J. Dinges

**COUNSEL FOR EVERGY KANSAS
CENTRAL**

In an effort to align processes, create efficiencies, and to create a seamless and improved experience for customers and employees the Company seeks the following tariff changes.

Average Payment Plan:

The Company seeks to align Evergy KS Central's Average Pay Plan (APP) with the APP previously approved by the Kansas Corporation Commission (KCC) and being used by Evergy Kansas Metro.

Changes to the Evergy Central plan would include 1. Updating the APP review calculation to include the total utility balance each month; 2. The implementation of a 10% variance minimum before adjusting the monthly APP payment amount; 3. Elimination of the periodic review adjustment.

By aligning this process Evergy Kansas Central Customers will see benefits of less fluctuations in their monthly APP amount from month to month due to the 10% minimum before adjusting the monthly APP and smaller fluctuations in their monthly APP amount due to the monthly review vs the annual periodic review. Additionally, Evergy employees and customers will benefit from the use of one process across both Kansas jurisdictions.

Align length of time to pay after a billing adjustment:

The Company seeks to align the length of time to pay after a billing adjustment in all Evergy jurisdictions.

Evergy is seeking to add the words "at least" to the tariff in order to allow more flexibility in the amount of time we can give a customer, if requested, to pay a balance due that resulted from a billing adjustment. Currently, Customers are allowed the same number of months to pay as was adjusted. The Company is requesting to allow flexibility to be able to give up to two (2) times the number of months to pay as was adjusted, if requested by the customer.

By aligning this process Evergy Central Customers will see a benefit of more time to pay if needed and employees will benefit by following one process across all jurisdictions.

Estimation Process:

The Company seeks to align the estimation process for Evergy Kansas Central with the estimation process previously approved by the Kansas Corporation Commission (KCC) and currently used by Evergy Kansas Metro.

The current estimation process used by Evergy Kansas Metro is base functionality of the MDM system. By using the base functionality for Evergy Kansas Central we avoid additional costs for enhancements or extensions to the MDM system. There is again, an employee benefit for using one process across all jurisdictions.

Meter Reading Charge:

The company seeks to align the wording of our tariffs with the wording of the Kansas Billing Standards. The Kansas Billing Standards uses the word "may" vs the word "shall" which gives more flexibility to use judgement when applying this charge to a customer. By aligning the language with the Kansas Billing Standard, it will also allow the Company to align processes across all jurisdictions. The use of one process across all jurisdictions benefits both employees and customers.

Extended Service Arrangement for Residential Customers:

This section describes a “Service Limiter” device that could be installed as an alternate to service disconnection. This program is obsolete and has not been used in many years. The Company offers other options to assist customers in managing their monthly bills and making on time payments to avoid disconnection of service such as the Average Payment Plan and payment arrangements. This program is not being removed due to the Customer Forward Program, but we are using this tariff filing as an opportunity to remove an obsolete item.

Commercial Credit Card Payments:

Through the consolidation of credit card vendors, the Company is requesting to expand availability of credit card payments, with a transaction fee, to Commercial and Industrial (C&I) Customers. This is an approved payment option currently offered to Evergy Kansas Central C&I customers. As part of this expansion, C&I customers in Evergy Kansas Metro will be provided the option to pay with a credit card for a fee. The fee will be 2.7% with a payment limit of \$5,000.00 per transaction based on a new agreement discussed with the selected vendor. As part of this consolidation, the fee for Kansas Central C&I customer credit card payments will be reduced from 3.25% to 2.7%, providing consistent terms across both Evergy Kansas jurisdictions. This proposed change will not impact the terms and conditions associated with Residential customers credit card payment option in Kansas Central or Kansas Metro.

Evergy seeks this consolidation to provide consistent payment options for all Kansas C&I customers. Credit card payment has been observed as a popular payment method for customers. Many other service providers provide a credit card payment option and therefore more consumers are using this as their primary method of paying recurring bills. Evergy also believes having a credit card option for Kansas Metro could help customers avoid service cut-off for non-payment or re-establish service sooner if they do not have other funds available. This would also help with respect to collections.

In proposing this consolidation, Evergy has considered the Kansas Minimum Standards for Payment Methods¹ and this request complies with those provisions. As a nonzero payment option all costs for this service will be exclusively borne by the users of this method. Under the negotiated arrangement with the credit card processing vendor, the 2.7% fee represents the total cost of providing the service and is a “pass-through” from the customer to the vendor. After being configured in our systems, there are no additional costs incurred by Evergy in providing the credit card payment. Evergy considers the fee to be reasonable as it is less than the current, Commission-approved fee in place at Kansas Central. In being approved, the prior fee was deemed reasonable and the consolidation results in a decrease cost for users of this payment option. Evergy plans to fully disclose availability of the credit card payment within its payment methods and will detail the fees to the customer.

Evergy has made diligent efforts to provide a cost-effective means for customers to use their credit cards and contends that the levels of customer service must be preserved for Kansas Central C&I customers and improve the service for Kansas Metro C&I customers.

¹ https://kcc.ks.gov/images/PDFs/pi/bill_payment_methods.pdf

Residential TOU customers/APP:

The Company seeks to allow Customers using the TOU tariff the ability to enroll in the Average Payment Plan (APP).

Today, legacy systems do not have the capability to allow TOU Customers the ability to participate in the APP. Once the TOU customers are moved onto the CCB system the limitation will no longer exist and the Company would like to allow the TOU customers the ability to participate in this payment plan if they choose to do so.

Diversion Charges:

The Company seeks to align the language in section 4.07.05(b)(iv) with the language in section 4.07.07(a)(iii). This will add clarity that payment, in full, for all diversion/tampering related charges will be paid prior to turn on during the Cold Weather Rule in lieu of rolling those specific charges into the 12-month payment plan.

Deposit Interest Application:

Finally, Evergy Kansas Central plans to apply deposit interest in January 2021, just prior to the Customer Forward Project go live, instead of December 2020 due to system constraints. Evergy has discussed this delayed approach with the Commission Staff and seeks Commission approval for this one-time delay to applying deposit interest.