



October 16, 2018

Jeff McClanahan  
Director of Utilities  
Kansas Corporation Commission  
1500 SW Arrowhead Rd.  
Topeka, Kansas 66604-4027

RE: Docket No. 15-GIMX-344-GIV

Dear Mr. McClanahan:

Please find attached the second six-month compliance report filing as required by Commission Order in Docket No. 15-GIMX-344-GIV.

Please do not hesitate to contact me should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robin Allacher', is written over the printed name.

Robin Allacher  
Regulatory Analyst

Enc.

Cc: Lisa Starkebaum

Westar Energy  
“Knock and Collect”  
Semi-Annual Compliance Report  
October 2018

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In the Matter of Westar Energy, Inc.           )  
Compliance Filing as Required                )  
by Commission Order in                         )  
Docket No. 15-GIMX-344-GIV                 )

Semi-Annual Compliance Report  
Submitted by Westar Energy, Inc.  
October 2018

## Overview

In docket 15-GIMX-344-GIV, the Commission issued an order approving a pilot program on August 7, 2017 to allow for a limited waiver of the Billing Standards for Westar and Southern Pioneer customers with AMI meters. For these customers, this waiver allows the utilities to replace the on-premises collection and disconnection/reconnection visits with alternative methods of contact during the three-year pilot program period. In lieu of amendments to the Billing Standards, the Commission approved this pilot program to evaluate the potential customer benefits and impacts. The first compliance report for the months of October 2017 through March 2018 was filed by Westar on April 13, 2018. This report is the second compliance report covering the months of April 2018 through September 2018.

### Number of Bills Sent Out by Month:

This table is comprised of the number of bills sent out during the calendar month.

Westar bills customers on a cycle basis with 21 cycles. Given that each month may have more or less than 21 business days there is a variance in total bills from month to month.

Other items to take into consideration when looking at this table are that a premise could see a regular bill and a final bill in the same month, depending on the turn off date. A premise could see a final bill for the old customer and an initial bill for the new customer in the same month as well. This is especially true in the months of July, August and September when there are many turn on and turn offs due to the college rush.

Month	Number of Business Days	Cycles	AMI Meter	Analog Meter	Total
April 2018	21	March cycle 18 through April cycle 17	668,293	44,143	712,436
May 2018	22	April cycle 18 through May cycle 18	712,960	34,145	747,105
June 2018	21	May cycle 19 through June cycle 18	689,083	24,827	713,910
July 2018	21	June cycle 19 through July cycle 18	704,792	13,068	717,860
August 2018	23	July cycle 19 through August cycle 20	772,736	12,087	784,823
September 2018	19	August Cycle 21 through September Cycle 18	638,314	8,895	647,209

#### Number of 10-Day Disconnect Notices by Month:

The table below shows the number of 10-day disconnect notices sent out during the calendar month. Again, one thing to remember when looking at all the tables in this report, Westar bills customers on a cycle basis with 21 cycles. Given that each month may have more or less than 21 business days, there will be a variance in numbers for each month.

<b>Month</b>	<b>AMI Meter</b>	<b>Analog Meter</b>
April 2018	30,826	3,580
May 2018	28,836	3,089
June 2018	29,086	4,271
July 2018	48,577	2,820
August 2018	75,166	3,511
September 2018	54,707	2,792

#### Number of Non-Pay Shut Off Orders Issued by Month:

Non-Pay Shut Off orders are issued when the customer's balance is still outstanding after the 10-day notice, the five-day notice, the two-day notice, and the one-day notice. The non-pay shut off order is then issued for the following morning. Not all of these orders were worked due to a variety of reasons which include limited personnel on the analog meter side and payment / payment arrangements made after the order was issued but before the order was worked.

<b>Month</b>	<b>AMI Meter</b>	<b>Analog Meter</b>
April 2018	6,906	473
May 2018	7,055	419
June 2018	4,809	254
July 2018	7,536	243
August 2018	10,428	292
September 2018	8,974	222

#### Number of Communication Attempts at the Five-Day Mark:

The table below shows the number of preferred method of contact communication attempts at the five-day mark for customers with AMI meters with an outstanding balance. The preferred method of contact could be phone call, email message or text message.

<b>Month</b>	<b>AMI Meter</b>
April 2018	23,204
May 2018	19,711
June 2018	20,512
July 2018	27,987

August 2018	45,349
September 2018	37,787

Number of Accounts Making Payments After the Five-Day Communication Attempt but Before the Two-Day Phone Call and Method of Payment:

The table below shows the number of accounts that made a payment after the five-day preferred method of contact attempt but before the two-day phone call attempt by method of payment. These could be full payments, partial payments, or pay agreement payments.

US Bank includes the bank plans, mobile app payments, web payments, IVR payments, TEL payments, collector payments and unauthorized pay station payments.

Fidelity Express are the authorized pay stations. The customer can pay with cash, check or money order at these pay stations.

CheckFreePay are the authorized pay stations at Walmart, Dillons and Kmart. The customer can pay with cash, check or money order at these pay stations.

Bill Matrix payments are the credit card payments, including the credit card autopayments.

Remittance payments are the payments made to the company PO Box. These are physical payments which could be check, money order or even cash.

	<b>AMI Meter</b>				
<b>Month</b>	<b>US Bank</b>	<b>Fidelity Express</b>	<b>CheckFreePay</b>	<b>Bill Matrix</b>	<b>Remittance</b>
April 2018	4,168	362	572	2,613	362
May 2018	4,279	318	518	2,549	292
June 2018	4,187	336	518	2,583	449
July 2018	6,156	465	774	3,869	445
August 2018	10,687	964	1,426	6,769	875
September 2018	9,048	827	976	5,384	839

Number of Communication Attempts at the Two-Day Mark:

The table below shows the number of phone call attempts for customers with an outstanding balance at the two-day mark for both AMI metered customers as well as Analog metered customers. This two-day communication attempt remains the same as required by the existing billing standards.

<b>Month</b>	<b>AMI Meter</b>	<b>Analog Meter</b>
April 2018	14,416	1,211
May 2018	12,091	851
June 2018	11,403	1,138
July 2018	14,259	647
August 2018	21,435	781
September 2018	19,722	671

Number of Accounts Making Payments After the Two-Day Phone Call but Before the One-Day Communication Attempt and Method of Payment:

The tables below show the number of accounts making payments after the two-day phone call communication attempt but before the one-day communication attempt by method of payment. Payments reflected consists of full payments, partial payments, or pay agreement payments. For Analog meters, April 2018 through September 2018 reflects the number of payments after the two-day phone call but before the disconnection since this is during the non-Cold Weather Rule.

	<b>AMI Meter</b>				
<b>Month</b>	<b>US Bank</b>	<b>Fidelity Express</b>	<b>CheckFreePay</b>	<b>Bill Matrix</b>	<b>Remittance</b>
April 2018	875	133	183	652	108
May 2018	936	126	178	630	75
June 2018	918	110	203	641	222
July 2018	1,297	139	253	852	122
August 2018	2,121	227	345	1,405	186
September 2018	2,223	238	323	1,336	197

	<b>Analog Meter</b>				
<b>Month</b>	<b>US Bank</b>	<b>Fidelity Express</b>	<b>CheckFreePay</b>	<b>Bill Matrix</b>	<b>Remittance</b>
April 2018	462	65	47	159	149
May 2018	372	41	33	114	118
June 2018	389	34	43	103	90
July 2018	351	28	26	75	106
August 2018	415	26	39	61	141
September 2018	365	26	32	44	122

Number of Communication Attempts at the One-Day Mark  
(including Analog Meters during CWR):

The table below shows the number of communication attempts at the one-day mark for customers with an outstanding balance. The one-day communication attempt during the non-Cold Weather Rule period is by the customer's preferred method of contact. The one-day communication attempt during the Cold Weather Rule period is by phone call and applies to both AMI and Analog metered customers.

<b>Month</b>	<b>AMI Meter</b>
April 2018	14,582
May 2018	10,351
June 2018	14,787
July 2018	16,357
August 2018	18,990
September 2018	15,498

Number of Door Tags performed by month during the Cold Weather Rule period:

The table below shows the number of door tags performed during the Cold Weather Rule period. The door tag is placed on the customer's door on the day prior to the disconnection day during the Cold Weather Rule period. No data is reflected for the months of April through September since those months are not part of the Cold Weather Rule period. This applies to residential customers only and does not apply to commercial customers.

<b>Month</b>	<b>AMI Meter</b>	<b>Analog Meter</b>
April 2018	0	0
May 2018	0	0

June 2018	0	0
July 2018	0	0
August 2018	0	0
September 2018	0	0

Number of Accounts Making Payments After the One-Day Communication Attempt but Before Disconnection and Method of Payment:

The table below shows the number of accounts making a payment after the one-day communication attempt but before the disconnection by the method of the payment. These consist of full payments, partial payments, and pay agreement payments.

	<b>AMI Meter</b>				
<b>Month</b>	<b>US Bank</b>	<b>Fidelity Express</b>	<b>CheckFreePay</b>	<b>Bill Matrix</b>	<b>Remittance</b>
April 2018	2,817	548	1,072	3,130	233
May 2018	2,450	456	977	2,916	179
June 2018	2,940	517	1,197	3,505	220
July 2018	4,254	815	1,548	4,801	304
August 2018	5,332	916	1,656	5,933	320
September 2018	4,516	721	1,227	4,704	260

Number of Knock and Collects on day of Disconnection:

The table below shows the number of knock and collects at the premises for Analog metered customers. For the months of April through September, the table reflects the number of collections at the door on the day of disconnection. Payments reflect full payment, partial payment, and pay agreement payments.

<b>Month</b>	<b>Analog Meter</b>
April 2018	74
May 2018	72
June 2018	35
July 2018	52
August 2018	66
September 2018	62



Number of Disconnections by Month:

The table below reflects the number of disconnections for customers with AMI meters and Analog meters. This would be for residential and commercial customers.

<b>Month</b>	<b>AMI Meter</b>	<b>Analog Meter</b>
April 2018	6,653	195
May 2018	6,680	137
June 2018	4,674	50
July 2018	6,404	52
August 2018	9,627	75
September 2018	8,384	47

Number of Accounts Paid for Reconnection and Method of Payment by Month:

The table below shows the number of accounts that paid for a reconnection by method of payment.

	<b>AMI Meter</b>				
<b>Month</b>	<b>US Bank</b>	<b>Fidelity Express</b>	<b>CheckFreePay</b>	<b>Bill Matrix</b>	<b>Remittance</b>
April 2018	1,110	213	448	1,490	17
May 2018	1,260	213	514	1,682	25
June 2018	981	142	366	1,231	25
July 2018	1,483	226	520	1,694	29
August 2018	2,593	361	792	3,245	39
September 2018	2,314	359	699	2,701	55

	<b>Analog Meter</b>				
<b>Month</b>	<b>US Bank</b>	<b>Fidelity Express</b>	<b>CheckFreePay</b>	<b>Bill Matrix</b>	<b>Remittance</b>
April 2018	16	1	2	11	0
May 2018	26	4	0	13	0
June 2018	23	10	1	27	0
July 2018	9	0	1	9	1

August 2018	24	1	4	7	2
September 2018	14	0	2	4	0

Distribution of Time between Disconnection, Payment and Reconnection:

The tables below reflect the time frame between the disconnection of service and the payment and reconnection of service. Both the payment and reconnection of service is considered one action. Westar is at 99.9%+ completion on automated service orders within 50 minutes, with most occurring in the first 10 minutes. For analog meters, same-day reconnection is the goal. At worst case, reconnection occurs within one business day. As reflected in the table, most customers paid and were reconnected on the same day as disconnection.

	<b>AMI Meter</b>						
<b>Month</b>	<b>Same Day</b>	<b>Within One Day</b>	<b>Within Two Days</b>	<b>Within Three Days</b>	<b>Within Four Days</b>	<b>Within Five Days</b>	<b>Greater than Five Days</b>
April 2018	2,514	342	129	97	39	30	127
May 2018	2,731	346	127	91	74	108	217
June 2018	2,168	193	90	73	55	39	127
July 2018	3,330	240	102	94	62	29	95
August 2018	5,842	500	190	129	72	77	220
September 2018	5,221	392	154	112	52	43	154

	<b>Analog Meter</b>						
<b>Month</b>	<b>Same Day</b>	<b>Within One Day</b>	<b>Within Two Days</b>	<b>Within Three Days</b>	<b>Within Four Days</b>	<b>Within Five Days</b>	<b>Greater than Five Days</b>
April 2018	21	6	1	0	1	0	1
May 2018	28	6	5	1	1	0	2
June 2018	10	16	16	13	0	0	6
July 2018	14	1	2	1	1	0	1
August 2018	28	7	1	1	0	0	1

September 2018	14	1	1	2	0	0	2
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#### Customer Education of Bill Assistance Programs:

Westar informs customers of its bill assistance programs in a variety of ways. Westar currently has two Customer Relations Advisors who are actively helping customers in both the North and South service territories. They have attended numerous resource fairs and outreach events where they have had the opportunity to educate and inform customers of the programs and services available for bill payment assistance. These events are geared towards educating parents of school age children, seniors, homeless, landlords and tenants. They have also attended the recent "Amnesty Day" where they were able to interact, educate and inform customers of our programs and services available. In addition, they have reached out to customers on a one on one basis partnering with the Catholic Charities Mobile Resource Bus, where the intent is to reach rural locations and customers that do not have access to a "brick and mortar" agency to go to for assistance. Along with the outreach events, the Customer Relations Advisors are creating organizational profiles on agencies which also include information and services available to our customers. Information on bill assistance is also on the Westar website under the "Help paying my bill" and Energy Assistance section. In addition, when a customer calls into the call center indicating their inability to make a payment, the customer service representative provides the 211 number for assistance in their immediate area.

#### Customer Complaints with respect to the Program:

Westar believes this program is very effective for our customers. Westar is not aware of any complaints specific to this pilot program during the reporting period of April through September. As such, Westar believes customers are well informed of the new procedures and that this program is serving their needs well.

#### Cost Savings Attributable to this program:

The cost savings attributable to this program are calculated based on the number of avoided truck rolls since disconnection could occur remotely for AMI customers.

Month	AMI Meter Disconnections
April 2018	6,653
May 2018	6,680
June 2018	4,674
July 2018	6,404

August 2018	9,627
September 2018	8,384

The average cost of a truck roll for a non-pay shut off is \$12.04.

This equates to a savings of \$510,760.88.

However, it is important to note that actual premises visits may be considerably less than the AMI experience based on resource restrictions on any given day. As such, a more conservative comparison would be to calculate savings based on last year's actual disconnections at the premises, which can be estimated at approximately 60% of AMI disconnections. Using this approach, cost savings would be valued at approximately \$308,000.

#### AMI Deployment Update

As of September 30, 2018, Westar is at 99.24% deployed for AMI meters.