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

In the Matter of the Application of Kansas City Power & Light Company for Approval of Average Payment Plan Tariff	)))	Docket No. 18-KCPE-062-TAR

NOTICE OF FILING OF STAFF'S REPORT AND RECOMMENDATION

COMES NOW, the Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively) and files its Report and Recommendation regarding the Application of Kansas City Power & Light Company for Approval of its Average Payment Plan Tariff.

WHEREFORE Staff respectfully requests the Commission accept this Report and Recommendation, and for any other relief as the Commission may deem appropriate.

Respectfully submitted,

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REPORT AND RECOMMENDATION
UTILITIES DIVISION

TO: Shari Feist Albrecht, Chair
Jay Scott Emler, Commissioner
Pat Apple, Commissioner

FROM: Josh Frantz, Senior Research Economist
Lana Ellis, Deputy Chief of Economics and Rates
Bob Glass, Chief of Economics and Rates
Jeff McClanahan, Director, Utilities Division

DATE: March 19, 2018

SUBJECT: 18-KCPE-062-TAR: *In the Matter of the Application of Kansas City Power & Light Company for Approval of Average Payment Plan Tariff*

EXECUTIVE SUMMARY:

Kansas City Power & Light Company (KCP&L or Company) currently offers an optional Average Payment Plan (Average Pay Plan) to its Residential class customers as a way for participating customers to reduce the variability of their monthly bill amount. In its Application for Approval of Modifications to its Average Payment Plan Tariff (Application) in this Docket, KCP&L has proposed modifications to the Average Payment Plan tariff. The driving force behind the timing of KCP&L's proposal is a major change in its billing system.

As part of its proposal, KCP&L has requested to expand eligibility for the Average Pay Plan to its Small General Service (SGS) class customers. Additionally, KCP&L has proposed to modify the way in which the average payment amount is adjusted for all participating customers. The purpose of adjusting the average payment amount is to reconcile the difference between the average payment amount and the amount actually owed. Under the current Average Pay Plan, the average payment amount is adjusted annually. Under the proposal, the average payment amount is reviewed monthly and automatically adjusted if it exceeds a 10% variance threshold compared to the amount actually owed.

The proposed tariff also includes an explanation of the estimation process used to calculate the initial average payment amount if there is not twelve months of actual usage history.

The Company has requested a tentative effective date for its proposal, to be determined once the go-live date of its new billing system becomes known, and a sixty-day "stabilization period" after the new billing system is introduced, during which the automatic average payment amount adjustment feature will not be implemented.

The proposal expands Average Pay Plan eligibility to SGS customers, allowing them to reduce the variability of their monthly bill amount. Additionally, through its investigation, Staff found the proposal reduces the potential amount of bad debt from participating customers. Therefore, Staff recommends the following:

- approval of the proposed methodology for adjusting the average payment amount subject to the inclusion of additional tariff language to clarify how the adjustment process works;
- extending Average Pay Plan eligibility to SGS customers who meet the criteria defined in Staff's proposed methodology for determining the initial payment amount;
- modifications to the proposed methodology used to determine the initial average payment for SGS customers; and
- approval of a tentative effective date and sixty-day stabilization period to allow KCP&L to align the changes to the Average Payment Plan with the implementation of its new billing system.

BACKGROUND:

Introduction

On August 4, 2017, in this Docket, KCP&L filed its Application for Approval of Modifications to its Average Payment Plan Tariff. Currently, Residential customers can use an Average Pay Plan to level their monthly bill payment. KCP&L has proposed modifications to its tariff related to Average Pay Plan eligibility, the calculation of the initial average payment amount when twelve months of data is not available, and the manner in which the average payment amount is periodically adjusted.

To provide context for Staff's recommendations, first, the status quo will be described, followed by a description of the modifications proposed in the Application.

Status Quo

Residential Eligibility

KCP&L offers the opportunity for its Residential customers to enroll in an Average Payment Plan,[1] wherein the customer may pay a calculated average cost (average payment), based on a twelve-

[1] *See* Section 4.07 of KCP&L's General Rules and Regulations Applying to Electric Service.

month average of their actual usage, in order to smooth out swings in their monthly bills. Currently, KCP&L only offers the Average Pay Plan to Residential customers.

Initial Average Payment Calculation

The initial average payment amount is based upon twelve months of actual usage, when available. If a record of twelve months of actual usage is not available, the Customer's usage is estimated to determine the average payment amount. Although the estimation process is not defined in the current tariff, here's how it works in practice: (1) if twelve months of actual usage is not available, nine months of actual usage is averaged to determine the initial average payment amount; (2) if nine months of actual usage is not available, the average payment amount is based upon usage history of nearby (i.e., same zip code) customers with premises served under the same rate schedule.

Average Payment Adjustment

Under the current tariff, the average payment amount is recalculated annually based upon the Customer's prior twelve months of usage. The difference between the Customer's annual billing under the Average Pay Plan and the Customer's annual billing under the appropriate rate schedule is also calculated. A customer whose annual payments under the Average Pay Plan totaled less than the annual amount due under the appropriate rate schedule may either pay the difference all at once or spread the amount across twelve equal monthly installments, which are then added to the monthly payment amount for the following year. A customer whose annual payments under the Average Pay Plan totaled more than the annual amount due receives a credit for the difference.

The Company also reserves the right to adjust/revise the monthly payment amount due to abnormal weather conditions, historical usage at the current premises, under/overestimation due to customer usage, rate tariff changes, or "other factors." Furthermore, the Customer may, at any time, request that the Company review the account to determine whether any modifications to the payment amount would be appropriate.

KCP&L's Proposed Modifications

SGS Eligibility

KCP&L has proposed to expand Average Pay Plan availability to SGS customers. The driving force behind the timing of KCP&L's proposal is its new billing system. KCP&L is in the process of changing its billing system from the Customer Information System (CIS) to the Oracle Utilities Customer Care and Billing (CCB). The Company's current billing system would have required extensive changes to be able to allow the Average Pay Plan for SGS customers; however, the base version of the CCB will have that functionality.[2]

Explanation of the Initial Average Payment Calculation

The proposed tariff includes an explanation of the estimation process used to calculate the initial average payment amount if there is not twelve months of actual usage history. The proposed estimation process is unchanged from the current practice for Residential customers and would extend to SGS customers in kind.

Modified Average Payment Readjustment

The proposed process of adjusting the average payment amount would no longer occur on a fixed yearly schedule. Under the proposal, each month, the average of the last twelve months of actual amounts due is calculated (including the cumulative over/under balance) and the average payment amount will automatically adjust on the following month's bill if there is more than a 10% variance between that calculated amount and the average payment amount in effect at that time.

Technical Modifications to the Average Pay Plan

Tentative Effective Date

The Company has requested a tentative effective date for its proposal, to be determined once the go-live date of its new billing system becomes known, in order to align the implementation of any changes to its billing procedures with the implementation of its new billing system (currently estimated May 1, 2018).

Sixty-day Stabilization Period

On February 2, 2018, the Company amended its Application and proposed tariff to include a sixty-day "stabilization period" after the CCB system is introduced, during which the automatic average payment amount adjustment feature will not be implemented.

ANALYSIS:

Standard of Review

Pursuant to K.S.A. 66-101 b, every electric public utility is required to furnish reasonably efficient and sufficient service and facilities, establish just and reasonable rates, and make just and reasonable rules, classifications, and regulations. Every unjust or unreasonably discriminatory or unduly preferential rule, regulation, classification, rate, charge, or exaction is prohibited and is unlawful and void. Furthermore, the Commission shall have the power to require all electric public

[2] *See* KCP&L response to Staff data request 6.

utilities governed by this act to establish and maintain just and reasonable rates when the same are reasonably necessary in order to maintain reasonably sufficient and efficient service from such electric public utilities.

Staff has interpreted "just and reasonable" and "sufficient and efficient service" to imply benefit-cost criteria for tariffs. In the case of the Average Pay Plan, the benefit to customers is a reduction in electric bill volatility that makes budgeting easier for customers, whether they are Residential or SGS customers. Since the Average Pay Plan does not ultimately change what customers are billed for their electric service over the course of a year, the costs that concern Staff are the possibility that extending Average Payment Plan eligibility to the SGS customer class and/or changing the method of adjusting the average bill could create an undue or unreasonable cross-subsidy.

In brief, small businesses have difficulty surviving, especially when first established.[3] If a small business goes under, there is the possibility of an unpaid balance. The change in the method of calculating the average payment could potentially lead to larger unpaid bills at the time of termination of service. In both cases, unrecoverable customer debt (bad debt) would be recovered from other members of the rate class in the next rate case. Thus, it is the risk of increasing bad debt that Staff will focus on in its analysis.

The Potential Risk of Extending the Average Pay Plan to SGS Customers

KCP&L's and Staff's analysis of debt write-offs for both SGS and Residential services showed that write-offs comprise less than 0.75% of annual revenues. [4,5,6] In fact, Staff found that write-offs account for a lesser percentage of revenues for SGS than they do for Residential customers, who are already offered an average payment option.

As part of its investigation, Staff simulated both the current and proposed average payment procedures using a sample dataset containing actual Residential and SGS customer data.[7] The metrics of performance Staff evaluated were average cumulative balance, average maximum cumulative balance, and average minimum cumulative balance. These metrics were chosen to gauge the difference between the estimated average payment amount and the actual amount due under the regular tariff.

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[3] According to 2017 Bureau of Labor Statistics data, for establishments opened in 2015, after one year the survival rate was 78.2% and 69.2% after two years.

[4] Staff's sample dataset consisted of five years of customer data for 400 randomly selected Residential and 400 randomly selected SGS customers. *See* Staff data request 2.

[5] Write-off/revenue ratio from Staff's sample dataset was 0.72% for Residential and 0.18% for SGS.

[6] 2016 write-off/revenue ratio for Residential was 0.72% and 0.29% for SGS. *See* KCP&L response to Staff data request 1.

[7] Staff's sample dataset consisted of five years of customer data for 400 randomly selected Residential and 400 randomly selected SGS customers. See Staff data request 2.

Figure 1. Average Pay Plan Cumulative Balances

Status Quo			
	AVG MAX Cumulative Balance	**AVG MIN** Cumulative Balance[8]	**AVG** Cumulative Balance
Residential	$313.76	($232.88)	$42.20
SGS[9]	*$377.84*	*($306.83)*	*$44.52*

Proposal			
	AVG MAX Cumulative Balance	**AVG MIN** Cumulative Balance	**AVG** Cumulative Balance
Residential	$255.91	($204.22)	$11.47
SGS	$283.74	($220.65)	$21.78

Comparing SGS to Residential under the Status Quo, Figure 1 shows SGS performed less favorably than Residential on all three metrics. However, this concern is mitigated by KCP&L's proposed modifications to its adjustment calculation, which leads to the next modification for discussion...

The Risk of the Proposed Method of Adjusting the Average Payment

The risk in offering customers an average payment option is that an increase in usage and/or rates can cause the average payment to insufficiently cover the actual amount due (alternatively, a decrease in usage and/or rates will cause a average payment to be too high). When a customer closes their account entirely or opts out of the Average Pay Plan, the accumulated difference between their average payments and the actual amount due is then charged or refunded to the customer. Without periodic readjustment, the difference between the average payments and the actual amount due can accumulate over time and may result in a hefty reconciliation balance.

Determining how and when to readjust the average payment amount is a precarious task because any adjustments to the payment amount run counter to the goal of predictable budgeting; meanwhile, eschewing adjustment would result in a very level bill followed by a potentially large eventual closing balance, and that, too, runs counter to the idea of predictable budgeting.

Under the proposal, each month, the average of the last twelve months' actual amounts due is calculated (including the cumulative over/under balance) and the average payment amount will automatically adjust on the following month's bill if there is more than a 10% variance between that calculation and the average payment amount in effect at that time.

[8] A *negative* cumulative balance represents an *overpayment* by the customer.

[9] Although average payment is not currently an option for SGS customers, for comparison sake, Staff applied the current adjustment process to actual SGS customer data.

The Company believes the 10% variance band will further smooth out swings in the customers' monthly bills and relieve any concerns of an increase in write-off amounts due to offering an Average Pay Plan.

As mentioned above, Staff simulated both the current and proposed average payment procedures using a sample dataset containing actual customer data for Residential and SGS customers. The simulation results show the proposed average payment adjustment process to be more responsive to fluctuations when compared to the current annual average payment adjustment process—the proposed process results in an average cumulative over/under balance, average maximum cumulative balance, and average minimum cumulative balance closer to $0 for both Residential and SGS customers (*See* Figure 1).

The tradeoff to a more responsive adjustment process is a more erratic adjustment schedule, which, over time, results in a more level payment amount for some customers, but a less level payment amount for others.[10] Staff finds this tradeoff to be worthwhile, particularly because average payment is voluntary, so if a customer finds their average payment amount to be too volatile, they can easily revert to paying their actual bill month-to-month.

Staff's analysis also shows the average cumulative balance under the *proposal* for SGS customers will actually be closer to $0 than the average cumulative balance under the *current* process for Residential customers who already have access to the Average Payment Plan. Additionally, the average maximum and minimum differences between the average payment and the actual amount due also improved. This, coupled with the low write-off/revenue ratios discussed above, is why Staff recommends expanding the Plan's availability to SGS customers.

Initial Average Payment Calculation

The initial average payment amount is calculated based upon the Customer's prior twelve months of usage. However, as stated in the current tariff, "[i]f a record of actual usage is not available, the Customer's usage will be estimated." KCP&L's proposed changes to the tariff describe how usage will be estimated for customers with less than twelve months of actual usage data. The proposed tariff indicates that if the customer has less than twelve months of usage on file, nine months of usage will be used to calculate the initial average payment. If the customer does not have nine months of usage on file, then the customer must contact a customer service representative from the Company who will manually calculate an average payment based upon an average of all customers within the same zip code under the same rate code.[11]

[10] Sometimes it can do both for the same customer across a span of multiple years (e.g., no adjustment for twenty-two months, with another adjustment five months after that).
[11] *See* KCP&L response to Staff data request 7.

The proposed explanation of the average payment calculation for customers with less than twelve months of billing data does not represent a change in practice for Residential customers;[12] however, nearby premises usage history is not a reasonable proxy for SGS average payment calculation in lieu of nine months of actual billing data—nearby SGS customers may operate in very different industries. Therefore, Staff recommends that if an SGS customer does not have nine months of usage history at the premises, usage history of nearby premises of customers served under the same rate schedule and operating in a similar industry may be used as proxy. SGS customers with less than nine months of usage history at the premises should be ineligible for the Average Pay Plan if usage history of nearby customers operating in a similar industry is not available. Staff discussed its proposed revisions to the tariff language regarding the calculation of the initial payment amount for customers with less than nine months of data (detailed below) with KCP&L and was told this recommendation would be acceptable.

Technical Modifications to the Average Pay Plan

Tentative Effective Date

There are some aspects of the proposal that cannot be put into place until the upcoming CCB is live, so it is a technical necessity that the effective date of the proposal be contingent upon the status of the CCB implementation. Therefore, Staff recommends approval of a tentative effective date to allow KCP&L to align the changes to the Average Payment Plan with the go-live date of its new billing system. This date will be updated in KCP&L's compliance tariff filing once the go-live date is known.

Sixty-day Stabilization Period

In order to allow for a stabilization period after the new CCB system is introduced, the Company believes that the CCB system will work most effectively if the automatic average payment amount adjustment feature is not implemented until the CCB system has been operating for sixty days. The Company amended its Application to update its proposed tariff to include said stabilization period.

Staff anticipates that this proposed alteration will have negligible long-term impact because, after sixty days, the automatic adjustment feature will account for any accumulated over/under balance. Additionally, this period will give the Company some time to identify and correct any kinks in the system, preventing potential erroneous automatic adjustments. Therefore, Staff finds the proposed change to be just and reasonable and recommends approval of the sixty-day stabilization period to begin on the effective date of the tariff, which is directly tied to the go-live date of the CCB system, as discussed above.

[12] *See* KCP&L response to Staff data request 5.

Tariff Language

Clarification of the Average Payment Adjustment Methodology

The proposed tariff does not adequately explain the average payment adjustment process.[13] Staff recommends the following modifications to KCP&L's proposed Section 4.07(E)(1), to clarify how the adjustment process works—in particular, how the cumulative over/under balance is incorporated into the calculation:

> If the customer has twelve (12) months of usage history at the premises, the calculation of the Plan payment will be the average of the last twelve (12) months of bills for the customer. Each month, the Company will average the prior twelve (12) bills for the customer, along with the cumulative balance of Plan payments compared to actual usage ((prior 12 bills + over/under balance) ÷ 12); ~~C~~commencing sixty (60) days from the effective date of the tariff, the Plan payment will automatically adjust on the next month's bill if there is more than a 10% variance in the calculation from the current Plan payment amount.

Initial Average Payment Calculation

As discussed above, Staff recommends that the option for average payment not be made available to SGS customers with less than nine months of actual usage history if usage history of nearby premises of customers served under the same rate schedule and operating in a similar industry is unavailable. Therefore, Staff proposes the following modifications to KCP&L's proposed Section 4.07(E)(2):

> If the customer does not have twelve (12) months of usage history at the premises, the Plan payment will be the average of the last nine (9) months of bills for the customer.¶
>
> If the customer does not have nine (9) months of usage history at the premises, but is otherwise eligible for an average payment plan, the customer must speak to a customer service representative (CSR). At that time, the CSR will manually calculate an average payment amount by viewing ~~a nearby premise~~ usage history of nearby customers with like premises~~ that is served under the same rate schedule~~.¶
>
> For the purpose of calculating an average payment amount, "like premises" means premises of customers served under the same rate schedule for customers serviced under Residential Service rate schedules and "like premises" means premises of customers served under the same rate schedule and operating in a similar industry

[13] The Company did provide a more detailed description of the proposed recalculation process, along with several examples, in response to Staff data requests 3 and 4.

for customers serviced under Small General Service rate schedules.¶

Customers serviced under Small General Service rate schedules who have less than nine (9) months of usage history at the premises shall be ineligible for the plan if usage history of nearby customers with like premises is not available.

RECOMMENDATION:

Because the proposed methodology for adjusting the average payment amount results in projected average cumulative over/under balance values closer to $0 for both Residential and SGS customers than the current methodology, Staff recommends approval the proposed methodology for adjusting the average payment amount subject to the inclusion of Staff's recommended changes to the tariff language described in detail above.

Based upon the low write-off/revenue ratios of SGS customers, as well as Staff's projected average cumulative balance values under the proposed methodology for adjusting the average payment amount, Staff recommends extending Average Pay Plan eligibility to SGS customers who meet the criteria defined in Staff's proposed methodology for determining the initial payment amount.

The proposed methodology for determining the initial average payment amount matches actual practice for Residential customers, however, Staff recommends a different set of criteria for determining the initial average payment amount for Small General Service customers. Thus, Staff recommends modifications to the methodology used to determine the initial average payment amount, described in detail above.

Staff recommends approval of a tentative effective date and sixty-day stabilization period to allow KCP&L to align the changes to the Average Payment Plan with the implementation of its new billing system.

CERTIFICATE OF SERVICE

18-KCPE-062-TAR

I, the undersigned, certify that a true and correct copy of the above and foregoing Notice of Filing of Staff's Report and Recommendation was served by electronic service on this 19th day of March, 2018, to the following:

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