

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

In the Matter of the Application of) 20-KCPE-205-TAR
Every Metro, Inc. d/b/a Every Kansas) File No. 20-EVRG-____-TAR
Metro for a Variance from the Commission's)
Electric and Natural Gas Billing Standards)

APPLICATION FOR LIMITED WAIVER

Come Now Every Metro, Inc. d/b/a Every Kansas Metro ("Every Kansas Metro" or the "Company") and files its *Application for a Limited Waiver* ("Application") of a portion of the requirement stated in the State Corporation Commission of the State of Kansas's ("Commission") Electric and Natural Gas Billing Standards ("Billing Standards"), Section I, Item A(1)a. In support of its Application, Every Kansas Metro states as follows:

1. Every Kansas Metro is a corporation duly organized under the laws of the State of Kansas engaged, among other things, in the business of electric public utilities, as defined by K.S.A 66-104, in legally designated areas within the State of Kansas. Every Kansas Metro holds certificates of convenience and authority issued by this Commission authorizing it to engage in such utility business.

2. Section I, Item A of the Commission's Billing Standards states, in part:

[...]each utility bill issued to a customer shall show: (a) The beginning and ending meter registration for the reading period except that estimated billing shall disclose that it is based on estimated meter reading[...].

3. Utility bills issued with beginning and ending registered reads are losing relevance as utilities are adopting time of use rates, dynamic rates, and installing interval or electronic meters for billing purposes. Every Kansas Metro recently requested and received permission from the Commission to offer a pilot time of use and demand rate in Docket No. 18-

KCPE-480-RTS.¹ A meter register is irrelevant with all time of use rates. This time of use rate has two or three daily billing periods and the rate applied to each period varies. As a result, it is necessary to have interval meter data in order to bill a customer using a time of use rate. The beginning and ending registered meter reads measuring the cumulative usage over the month are not relevant to the calculation of the customer's bill under a time of use or demand rate. What is important is the number of kWh consumed in each time period (e.g., on peak or off peak). Due to a rounding issue, a meter's interval data and its scalar reads produce slightly different totals when used to calculate a customer's usage. Though the difference is small, showing both the interval usage and scalar reads on a customer's bill would produce different results and would cause confusion for the customer.

4. Interval meter data is also used to perform market settlements in wholesale markets, perform load forecasting, and provide information to customers regarding their usage through an online system. For example, use of AMI meters allow customers to access an online portal that provides detailed information about the customer's usage.

5. For customers that continue to have non-electronic meters in place, Evergy Kansas Metro will continue to comply with this portion of the Billing Standards and provide the beginning and ending meter registration for the reading period on a customer's bill. However, Evergy Kansas Metro is requesting a waiver with respect to this requirement for customers that have electronic meters in place.

¹ Effective October 8, 2019, Evergy Kansas Metro adopted the service territory and tariffs of Kansas City Power & Light Company ("KCP&L"). See, *Order Approving Name Change*, Docket No. 20-KCPE-122-CCN, dated October 8, 2019.

6. For customers with electronic meters, Evergy Kansas Metro requests that the Commission allow the Company to include the interval data provided by the electronic meter on the customer's bill.

7. A draft revision of Evergy Kansas Metro's General Rules and Regulations, Section 4.02 (A)(1) incorporating the proposed waiver is attached as **Appendix A**.

8. Evergy Kansas Metro requests that the Commission issue an order in this docket within 90 days of the date of this Application is filed.

WHEREFORE, Evergy Kansas Metro respectfully requests that the Commission issue an order waiving the portion of Section I, Item A of the Billing Standards discussed in paragraphs 2 through 7 above.

Respectfully submitted,

/s/ Robert J. Hack

Robert J. Hack (KS #12826)

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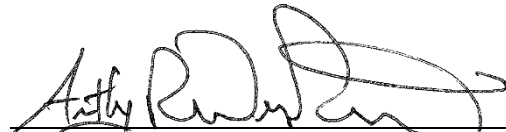
**ATTORNEYS FOR EVERGY
KANSAS METRO**

STATE OF MISSOURI)
) SS
COUNTY OF JACKSON)

Darrin R. Ives of lawful age, being first duly sworn, upon his oath deposes and says that he is Vice President—Regulatory Affairs, for Evergy Kansas Metro; that he has read and is familiar with the foregoing Application; and that the statements therein contained and in the exhibits filed therewith are true to the best of his knowledge, information and belief.

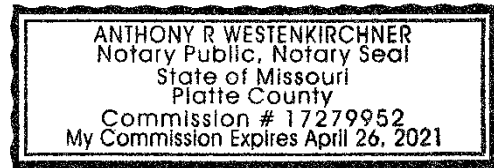
Subscribed and sworn to before me this 30th day of October 2019.


Darrin R. Ives


Notary Public

My Commission Expires:

4/26/2021



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 1st day of November 2019 to:

TERRI PEMBERTON, CHIEF LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027
t.pemberton@kcc.ks.gov

with a courtesy copy to:

DAVID W. NICKEL, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
D.NICKEL@CURB.KANSAS.GOV

/s/ Robert J. Hack

Robert J. Hack

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

(Name of Issuing Utility)

Replacing Schedule _____ Sheet _____

Evergy Kansas Metro

(Territory to which schedule is applicable)

which was filed August 30, 1989No supplement or separate understanding
shall modify the tariff as shown hereon.Sheet 22 of 99 Sheets**GENERAL RULES AND REGULATIONS
APPLYING TO ELECTRIC SERVICE (continued)****4. BILLING AND PAYMENT****4.01 BILLING PERIOD:**

Normally, the Company will read the Customer's meter monthly, and bills based on such monthly readings will be rendered at intervals of approximately one month. The Company shall have the right to read meters and render bills more frequently than monthly, and, in such event, the total of the minimums of such bills for any one month shall not exceed the monthly minimum required under the applicable rate schedule.

4.02 CONTENT OF BILLS:

(A) Each bill for electric service shall show the following:

(1) The beginning and ending meter registration for the reading period or the usage for the billing period obtained from an electronic meter except that an estimated bill should disclose that it is based on estimated usage;

(2) The date the meter was read and the date of the bill;

(3) The final date by which a payment can be received before a delinquency charge is imposed;

(4) Actual or estimated usage during the billing period;

(5) The amount due if payment is made prior to the final date by which payment can be received before the bill is deemed delinquent and the amount due if payment is received after the bill is deemed delinquent;

(6) The amount of additional charges for past due accounts, security deposits, collection, reconnection and/or disconnection charges, installment payments and other utility charges authorized by the State Corporation Commission;

Issued: _____

Month Day Year

Effective: _____

Month Day Year

By: Darrin R. Ives, Vice President

Title

FILED _____

THE STATE CORPORATION COMMISSION OF
KANSAS

By: _____

Secretary

KANSAS CITY POWER & LIGHT COMPANY
EVERGY
METRO, INC. d/b/a EVERGY KANSAS METRO

(Name of Issuing Utility)

Replacing Schedule _____ Sheet _____

Rate Areas 2 & 4Evergy Kansas Metro

(Territory to which schedule is applicable)

which was filed August 30, 1989No supplement or separate understanding
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Sheet 22 of 99 Sheets

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(6) The amount of additional charges for past due accounts, security deposits, collection, reconnection and/or disconnection charges, installment payments and other utility charges authorized by the State Corporation Commission;

Issued: August 30, 1989
Month Day Year

Effective: September 7, 1989
Month Day Year

By: B. J. Beaudoin Darrin R. Ives, Vice
President Title

FILED September 7, 1989THE STATE CORPORATION COMMISSION OF
KANSASBy: _____
Secretary