

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

In the Matter of Addressing the COVID-19 )  
Pandemic in the State of Kansas. ) Docket No. 20-GIMX-393-MIS

**NOTICE OF FILING OF STAFF'S REPORT AND RECOMMENDATION**

The Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively), submits its Notice of Filing of Staff's Report and Recommendation and states as follows:

Staff hereby files the attached Report and Recommendation dated December 8, 2020, recommending the Commission approve an extension of the minimum protections currently in place into the year 2021 until the official end of the COVID-19 pandemic.

WHEREFORE, Staff requests the Commission consider its Report and Recommendation, and for any other further relief as the Commission deems just and reasonable.

Respectfully submitted,

*s/ Cole Bailey*

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Susan K. Duffy, Chair  
Dwight D. Keen, Commissioner  
Andrew J. French, Commissioner

Laura Kelly, Governor

## **REPORT AND RECOMMENDATION UTILITIES DIVISION**

**TO:** Chair Susan K. Duffy  
Commissioner Dwight D. Keen  
Commissioner Andrew J. French

**FROM:** Andria Jackson, Deputy Chief of Revenue Requirements, Cost of Service and Finance  
Justin Grady, Chief of Revenue Requirements, Cost of Service and Finance  
Jeff McClanahan, Director

**DATE:** December 8, 2020

**SUBJECT:** Docket No. 20-GIMX-393-MIS: In the Matter of Addressing the COVID-19 Pandemic in the State of Kansas.

### **EXECUTIVE SUMMARY:**

On May 5, 2020, the Commission issued its Third Emergency Order Suspending Disconnects, which required all jurisdictional public utilities to suspend the practice of disconnecting service for non-payment through May 31, 2020. On May 21, 2020, prior to the expiration of this Order, the Commission adopted Staff's Report and Recommendation filed on May 6, 2020, recommending all jurisdictional electric, natural gas, and water utilities be required to offer certain minimum protections to any residential or small commercial customer that has experienced negative financial impact during the COVID-19 pandemic through the remainder of 2020. Since the threat of the pandemic remains, and based on its analysis of all company-specific customer reporting data provided throughout the course of the pandemic thus far, Staff recommends the Commission approve an extension of the minimum protections currently in place into the year 2021 until the official end of the COVID-19 pandemic.

### **BACKGROUND:**

On March 16, 2020, the Commission issued an Emergency Order Suspending Disconnects, pursuant to K.S.A. 77-536(b) to prevent or avoid the immediate danger to the public health, safety or welfare, and directed all public utilities under the Commission's authority to suspend the practice of disconnecting service for nonpayment while customers and communities experienced

potential hardship from the COVID-19 virus.<sup>1</sup> The Commission’s Emergency Order Suspending Disconnects was effective for 30 days, through April 15, 2020. On April 14, 2020, the Commission issued a Second Emergency Order Suspending Disconnects through May 15, 2020.<sup>2</sup> Since the threat of the COVID-19 pandemic remained, on May 5, 2020, the Commission issued a Third Emergency Order Suspending Disconnects until May 31, 2020.<sup>3</sup>

On May 6, 2020, Staff filed a Report and Recommendation recommending the establishment of baseline customer protections for residential and small commercial customers of all electric, natural gas, and water utilities, before the expiration of the Commission’s final disconnect order and the resumption of disconnection and collection activities.<sup>4</sup> The minimum customer protections recommended by Staff included: (1) a payment plan up to 12-months to pay off any delinquent account balances that arose during the Commission’s prohibition on disconnections; and (2) the waiver of all late fees during the period of delinquency and repayment. Once the Commission’s disconnection moratorium lifted, Staff recommended extending these baseline protections for the remainder of 2020, for any residential or small commercial customer that experienced negative financial impact during the COVID-19 pandemic, and with the likelihood of an additional extension if the COVID-19 pandemic stretched into 2021. Furthermore, Staff recommended allowing the utilities to defer any extraordinary bad debt expenses and foregone fee revenue that arose from these customer protections into a regulatory asset, for accounting purposes only, to be addressed in the utility’s next rate case or alternative rate recovery filing.

On May 21, 2020, the Commission issued an Order concerning the expiration of its disconnection moratorium.<sup>5</sup> In the Order, the Commission adopted Staff’s Report and Recommendation, requiring jurisdictional electric, natural gas and water utilities to offer its residential and small commercial customers the aforementioned minimum customer protections through 2020. In the event that the COVID-19 pandemic stretches into 2021, Staff is directed to file a recommendation in this Docket recommending an extension of these protections. Additionally, the Commission further directed Staff to monitor the impact of COVID-19 on customers and their utility companies in order to make additional recommendations in this Docket as appropriate.

On April 14, 2020, Black Hills Kansas Gas Utility Company, LLC (Black Hills); Kansas Gas Service, a Division of ONE Gas, Inc. (KGS); and Atmos Energy Corporation (Atmos) (collectively “Gas Utilities”) filed a Joint Application seeking an Accounting Authority Order (AAO) that would authorize the Gas Utilities to accumulate and defer for recovery in their next rate case filings certain costs incurred and revenues lost related to the COVID-19 virus, plus associated carrying costs beginning March 1, 2020.<sup>6</sup> On April 16, 2020, The Empire District Electric Company (Liberty-Empire) also filed an Application for an AAO.<sup>7</sup> On May 6, 2020, Evergy Metro, Inc. (Evergy Kansas Metro), Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. (together as

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<sup>1</sup> *Emergency Order Suspending Disconnects*, Docket No. 20-GIMX-393-MIS (20-393 Docket) (Mar. 16, 2020).

<sup>2</sup> *Second Emergency Order Suspending Disconnects*, 20-393 Docket (Apr. 14, 2020).

<sup>3</sup> *Third Emergency Order Suspending Disconnects*, 20-393 Docket (May 5, 2020).

<sup>4</sup> *Notice of Filing of Commission Staff’s Report and Recommendation*, 20-393 Docket (May 6, 2020).

<sup>5</sup> *Order Concerning Kansas Jurisdictional Utilities Following Expiration of Prohibition of Disconnects*, 20-393 Docket (May 21, 2020).

<sup>6</sup> *Joint Application*, Docket No. 20-GIMG-423-ACT (Apr. 14, 2020).

<sup>7</sup> *Application*, Docket No. 20-EPDE-427-ACT (Apr. 16, 2020).

Evergy Kansas Central) (collectively “Evergy”) filed a request for an AAO as well.<sup>8</sup> The AAO Applications filed by Liberty-Empire and Evergy are effectively the same as the Gas Utilities’ Application. In response to the filings, Staff filed a Report and Recommendation in each docket supporting the utilities’ requests for an AAO and also recommended the utilities file detailed reports in a compliance filing upon approval of the requested AAOs.

On July 9, 2020, the Commission issued an Order Approving Application for Accounting Authority Order in each of the AAO dockets. In the Orders, the Commission approved each utilities’ request for an AAO to defer to a regulatory asset all incremental costs (net of any cost decreases) and lost revenue associated with the COVID-19 pandemic, subject to the recommendations set forth in Staff’s Report and Recommendation filed in each docket. Pursuant to the requirements of the Orders issued in the AAO dockets, each utility has submitted its compliance filings in the following dockets: (1) Black Hills in Docket No. 21-BHCG-026-CPL; KGS in Docket No. 21-KGSG-042-CPL; (3) Atmos in Docket No. 21-ATMG-044-CPL; (4) Liberty-Empire in Docket No. 21-EPDE-072-CPL; and (5) Evergy in Docket No. 20-EKME-454-ACT.

### **ANALYSIS:**

Staff’s recommendation to extend the minimum customer protections is based primarily on its assessment of the reporting metrics of several major KCC-jurisdictional utilities in the state of Kansas. As previously stated, the Commission has approved AAOs for the Gas Utilities, Evergy, and Liberty-Empire. In each of the AAO dockets, Staff developed, and the Commission approved, detailed reporting requirements. Specifically, the continuous reporting requirements include: (1) a quarterly filing report detailing the identification and impacts of all COVID-19 related cost, revenue, capital, debt and credit rating changes, beginning with the quarter ending June 30, 2020; and (2) a monthly filing detailing changes in customer count, arrearage data, number of delinquent accounts, number of customers signed up for a payment plan, average amount of the payment plan, and other statistics pertaining to the impact of the pandemic on customers.

Staff has compiled a spreadsheet summarizing the monthly customer reporting data from those dockets in order to analyze the impact of the minimum protections on customers and the utilities. This data is presented by utility, and is attached to this Report. Specifically, in this spreadsheet Staff has presented the following customer data, by month:

- Number of Residential and Commercial Customers;
- Number of Involuntary Disconnections;
- Number of Reconnections;
- Number of Voluntary Disconnections;
- Total Outstanding Arrearage Balances;
- Number of Customers with Delinquent Accounts;
- Number of Residential Customers on COVID-19 Payment Plans;
- Average Residential Payment Plan Amount;

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<sup>8</sup> *Application of Evergy Metro, Inc., Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. for Accounting Authority Order Related to COVID-19 Costs and Financial Impacts*, Docket No. 20-EKME-454-ACT (May 6, 2020).

- Number of Customers Unable to Keep Payment Plan Arrangements;
- Net Change in Customer Count (Residential and Commercial);
- Net Residential Customer Disconnections (Net of Reconnections); and
- Running Total of Residential Disconnections as a % of Total Residential Customers.

According to the data provided, since the beginning of the reporting period, four of the six utilities (Evergy Kansas Central, Evergy Kansas Metro, Black Hills, and KGS) have experienced a decline in the total number of customers with outstanding delinquent account balances, while Atmos and Liberty-Empire have experienced an increase in the number of delinquent accounts.<sup>9</sup> Additionally, all utilities but Liberty-Empire have experienced a reduction in outstanding arrearage balances. Furthermore, the number of net customer disconnections is a small percentage of the total customers. This is because a significant majority of customers who are disconnected are subsequently reconnected.

For example, while 25,610 Evergy Kansas Central customers were involuntarily disconnected from July 2020 through October 2020, 79.40%, or 20,335 of those customers were subsequently reconnected. The running total number of Evergy Kansas Central residential customers that have been involuntarily disconnected (and not subsequently reconnected) equated to 5,255 customers as of October 31, 2020, or .84% of total residential customers. The numbers are similar with the other five utilities, with less than 1% of customers remaining disconnected as of October 2020 (without subsequent reconnection). Additionally, as of the most recent reporting month (October 2020), Evergy Kansas Central, Atmos, Black Hills, and Liberty-Empire have all reported fewer customers with delinquent account balances than the corresponding time frame in 2019. KGS's delinquent account count was slightly higher (45,684 versus 44,547) and Evergy Kansas Metro did not keep Kansas-specific delinquent account data in 2019. The data is more mixed when looking at total outstanding arrearage balances. Both Evergy utilities and Black Hills have reported lower delinquent account balances when compared with the same time period in 2019. Atmos, KGS, and Liberty-Empire report higher total arrearage balances compared to a year ago. Furthermore, while there have been fluctuations in residential and commercial account numbers, none of the six utilities have experienced a significant decline in active customer numbers.

The reporting data also shows that the requirement for utilities to offer a payment plan of up to 12-months for any delinquent account balance is providing customers with protections from mass disconnects while at the same time allowing customers to make progress towards paying off their delinquent balances. The average monthly payment for customers signed up under these plans is as follows as of October 2020:

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<sup>9</sup> Please note that Evergy's delinquent account data (including number of accounts and outstanding arrearage balances) excludes customers on a payment plan.

Utility	Monthly Payment
Evergy Kansas Central	\$ 51.56
Evergy Kansas Metro	\$ 74.87
Kansas Gas Service	\$ 41.67
Atmos Energy	\$ 44.01
Black Hills	\$ 31.29
Liberty-Empire	\$ 165.45

Please note, Staff believes the Liberty-Empire value represents the total monthly payment amount, inclusive of current bill and arrearage monthly payment amount. The other values represent only the monthly arrearage payment amount.

While there are certain to be customers who find these payment amounts difficult to maintain, the reporting data suggests that over 90% of customers are able to keep current with these payment arrangements.

In addition to the reporting requirements in the AAO dockets, the utilities were also required to file detailed narratives describing: (1) the processes and procedures the company planned to utilize to identify and track all cost increases and decreases as well as any lost revenue experienced in the response to COVID-19; and (2) the customer program/protections the company has implemented to assist its customers as a result of the COVID-19 pandemic. Based on the narratives provided regarding customer programs and protections, the utilities have collectively gone beyond the minimum requirements initially set forth in this docket. For instance, after the disconnection moratorium was lifted on June 1, 2020, some of the utilities continued to suspend disconnects to ensure the health and safety of its customers as well as provide financial relief that the suspension of disconnects provided. These efforts further benefitted the health and safety of its employees as disconnects typically result in reconnects, which would have increased customer and employee contact.

Overall, the provisions of the minimum protections appear to be reasonable and working as intended. With one exception (Liberty-Empire), customer arrearage balances are falling and four of the six utilities have less active accounts in arrears now than when the reporting began. Additionally, the net number of customers disconnected is below 1% of customers and around 90% of customers are able to keep up with the payment plans currently in place. Staff will continue to monitor the impact of COVID-19 on these utilities and its customers by continuously updating its spreadsheet of the customer data provided in the AAO compliance filings as they are submitted. By continuously monitoring the effect of COVID-19 on customers and business activity based on the compliance reporting data, Staff will be ready to supplement its recommendation in the future should it become necessary.

Staff also makes its recommendation based on other factors, such as the current level of unemployment and COVID-19 case data. Since peaking in April 2020 at 11.9%, the unemployment rate in Kansas has experienced consecutive monthly improvement. According to

the Bureau of Labor Statistics (BLS), in October 2020 the Kansas unemployment rate was 5.3%.<sup>10</sup> This represents a decrease from 5.9% in September 2020 and an increase from 3.1% in October 2019. While Kansas continues to make an economic recovery during the pandemic, the level of unemployment still remains historically high.

Furthermore, statistical data proves COVID-19 continues to be a pandemic. The Kansas Department of Health and Environment (KDHE) maps a variety of COVID-19 data at the state and county level and provides COVID-19 summary updates every Monday, Wednesday and Friday. According to KDHE, as of December 4, 2020, there were 168,295 COVID-19 reported cases in Kansas with 5,417 hospitalizations and 1,786 statewide deaths.<sup>11</sup> This represented 6,234 new cases, 127 new hospitalizations, and 107 new deaths reported since December 2, 2020. In total, since November 30, 2020, there were 10,849 new cases, 312 new hospitalizations, and 226 new deaths reported statewide in the last five-day reporting period.

Overall, COVID-19 continues to be an issue that is effecting businesses and employment levels and continues to be a pandemic. Based on Staff's analysis of the effects of the minimum protections in place, it appears to be working well for both customers and the utilities. Therefore, Staff recommends the Commission extend the minimum customer protections into 2021 through the end of the pandemic.

**RECOMMENDATION:**

Staff recommends the Commission approve an extension of the minimum customer protections currently in place into 2021 until the COVID-19 pandemic has officially ended. Specifically, Staff recommends that all jurisdictional electric, natural gas, and water utilities continue to be required to offer their residential and small commercial ratepayers the following minimum customer protections:

- A payment plan of up to 12-months to pay off any delinquent account balance; and
- The waiver of all late fees during the period of delinquency and repayment.

These customer protections should be viewed as the minimum a utility must offer. Staff also recommends the Commission issue an Order prior to these minimum customer protections ending on December 31, 2020. Staff will continue to monitor the impact of COVID-19 on customers and their utility companies in effort to offer additional future recommendations in this docket should it become necessary.

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<sup>10</sup> See <https://www.bls.gov/regions/mountain-plains/kansas.htm#eag>.

<sup>11</sup> See <https://www.coronavirus.kdheks.gov/160/COVID-19-in-Kansas>.

COVID-19 AAO Reports --Customer Data (20-EKME-454-ACT)

Evergy Kansas Central

	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20
# of Residential Customers			628,394	631,744	635,790	629,518	628,255
# of Commercial Customers			87,293	87,483	87,612	87,580	87,604
# of Involuntary Disconnects (Res)				4,580	7,163	6,215	7,652
# of Involuntary Disconnects (Com)				86	217	140	93
# of Reconnections (Res)				3,379	5,292	5,232	6,452
# of Reconnections (Com)				62	89	114	187
# of Voluntary Disconnects (Res)			2,120	2,442	3,059	7,308	7,254
# of Voluntary Disconnects (Com)			54	76	95	248	186
Total Arrearages (Excl. Pay Arrangements)	\$ 21,591,288	\$ 23,384,706	\$ 23,833,815	\$ 14,289,740	\$ 12,475,601	\$ 14,386,381	\$ 10,374,026
# Cust. With Late Accts. (Excl. Pay Arrangements)	75,144	76,429	79,362	61,558	66,825	67,030	53,504
# of Res. Customers on COVID Payment Plans			2,687	16,281	17,322	15,948	17,721
Avg. Res. Monthly Payment Amount			\$ 65.99	\$ 71.84	\$ 63.85	\$ 58.24	\$ 51.56
# of Customers Unable to Keep Payment Plans	This information was not included in Evergy's Compliance Filings. Staff has alerted Evergy to this fact. Evergy has agreed to get the data updated and will include this information in the November report.						
Net Change in Res. Cust.				3,350	4,046	(6,272)	(1,263)
Net Change in Com. Cust.				190	129	(32)	24
Net Res. Cust. Disconnections				1,201	1,871	983	1,200
Running Total % of Res. Cust. Disconnected				0.19%	0.48%	0.64%	0.84%

Notes:

Evergy--Involuntary Disconnects Moratorium expired on May 31, 2020. Evergy continued moratorium on voluntary basis through July 15, 2020.



COVID-19 AAO Reports --Customer Data (20-EKME-454-ACT)

		Eversky Kansas Metro						
		Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20
# of Residential Customers				234,729	235,107	235,485	235,603	235,358
# of Commercial Customers				30,143	30,223	30,192	30,232	30,280
# of Involuntary Disconnects (Res)					350	1,169	807	1,039
# of Involuntary Disconnects (Com)					16	64	33	43
# of Reconnections (Res)					232	1,057	683	935
# of Reconnections (Com)					6	28	20	21
# of Voluntary Disconnects (Res)				6,015	7,228	6,517	6,524	6,348
# of Voluntary Disconnects (Com)				3	23	300	319	289
Total Arrearages (Excl. Pay Arrangements)	\$	6,528,890	\$ 10,254,925	\$ 7,494,546	\$ 7,429,335	\$ 5,235,158	\$ 5,940,656	\$ 4,747,548
# Cust. With Late Accts. (Excl. Pay Arrangements)		20,957	19,896	18,551	16,318	17,367	17,522	15,843
# of Res. Customers on COVID Payment Plans				596	2,360	2,612	2,114	2,339
Avg. Monthly Payment Amount	\$		\$ 62.03	\$ 79.53	\$ 78.21	\$ 68.30	\$ 74.87	
# of Customers Unable to Keep Payment Plans		This information was not included in Eversky's Compliance Filings. Staff has alerted Eversky to this fact. Eversky has agreed to get the data updated and will include this information in the November report.						
Net Change in Res. Cust.					378	378	118	(245)
Net Change in Com. Cust.					80	(31)	40	48
Net Res. Cust. Disconnections					118	112	124	104
Running Total % of Res. Cust. Disconnected					0.05%	0.10%	0.15%	0.19%

Notes:

Eversky--Involuntary Disconnects Moratorium expired on May 31, 2020. Eversky continued moratorium on voluntary basis through July 15, 2020.

## COVID-19 AAO Reports --Customer Data (21-KGSG-042-CPL)

### Kansas Gas Service

	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20
# of Residential Customers	590,017	588,287	583,084	583,953	584,151
# of Commercial Customers	36,943	36,785	36,360	36,380	36,331
# of Involuntary Disconnects (Res)	4,083	6,234	1,465	696	633
# of Involuntary Disconnects (Com)	146	166	41	17	8
# of Reconnections (Res)	1,131	3,363	1,228	1,084	1,772
# of Reconnections (Com)	19	22	18	21	173
# of Voluntary Disconnects (Res)	7,259	7,197	5,797	5,536	4,831
# of Voluntary Disconnects (Com)	197	225	134	177	138
Total Arrearages	\$ 7,917,665	\$ 6,044,493	\$ 5,944,437	\$ 5,874,024	\$ 7,664,130.00
# Cust. With Late Accts.	46,347	43,477	46,257	43,936	45,684
# of Res. Customers on COVID Payment Plans	17,304	20,523	28,275	28,275	37,070
Avg. Monthly Payment Amount	\$ 44.00	\$ 43.00	\$ 42.00	\$ 41.53	\$ 41.67
# of Customers Unable to Keep Payment Plans	26	100	711	878	3,426
Net Change in Res. Cust.		(1,730)	(5,203)	869	198
Net Change in Com. Cust.		(158)	(425)	20	(49)
Net Res. Cust. Disconnections		2,871	237	(388)	(1,139)
Running Total % of Res. Cust. Disconnected		0.49%	0.53%	0.47%	0.27%

Notes:

**REDACTED**

**COVID-19 AAO Reports --Customer Data (21-BHCG-026-CPL)**

	Black Hills Energy						
	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20
# of Residential Customers	102,952	102,801	102,977	103,107	104,135	103,101	102,779
# of Commerical Customers	11,480	11,440	11,408	11,372	11,331	11,241	11,180
# of Involuntary Disconnects (Res)	-	-	-	-	82	745	147
# of Involuntary Disconnects (Com)	-	-	-	-	26	54	6
# of Reconnections (Res)	-	-	-	-	11	267	93
# of Reconnections (Com)	1	-	-	-	2	15	3
# of Voluntary Disconnects (Res)	1,638	1,729	2,179	3,502	2,685	1,748	1,671
# of Voluntary Disconnects (Com)	157	174	169	198	176	153	138
Total Arrearages	\$ 543,714	\$ 703,955	\$ 864,340	\$ 965,442	\$ 867,335	\$ 655,788	
# Cust. With Late Accts.	3,360	4,120	4,580	4,873	4,329	3,710	
# of Res. Customers on COVID Payment Plans	179	187	191	235	450	594	381
Avg. Monthly Payment Amount	\$ 34.51	\$ 31.66	\$ 32.47	\$ 29.99	\$ 31.06	\$ 32.78	\$ 31.29
# of Customers Unable to Keep Payment Plans	-	-	-	-	-	-	-
Net Change in Res. Cust.		(151)	176	130	1,028	(1,034)	(322)
Net Change in Com. Cust.		(40)	(32)	(36)	(41)	(90)	(61)
Net Res. Cust. Disconnections		-	-	-	71	478	54
Running Total % of Res. Cust. Disconnected		0.00%	0.00%	0.00%	0.07%	0.53%	0.59%

Notes: Black Hills--Involuntary Disconnects Moratorium expired on May 31, 2020. Black Hills continued moratorium on voluntary basis through August 1, 2020.

**REDACTED**

**COVID-19 AAO Reports --Customer Data (21-ATMG-044-CPL)**

	Atmos Energy						
	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20
# of Residential Customers	126,297	126,515	126,524	126,740	126,662	126,777	127,412
# of Commercial Customers	9,204	9,219	9,099	9,001	9,176	9,087	9,183
# of Involuntary Disconnects (Res)	-	-	-	-	-	-	-
# of Involuntary Disconnects (Com)	-	-	-	-	-	-	-
# of Reconnections (Res)	-	-	-	-	-	-	-
# of Reconnections (Com)	-	-	-	-	-	-	-
# of Voluntary Disconnects (Res)	178	281	143	128	26	23	23
# of Voluntary Disconnects (Com)	50	53	36	23	38	16	14
Total Arrearages	\$ 1,650,502	\$ 1,758,454	\$ 1,809,350	\$ 1,183,331	\$ 725,563	\$ 827,121	
# Cust. With Late Accts.	15,836	15,991	15,704	16,200	15,428	16,835	
# of Res. Customers on COVID Payment Plans	331	453	466	346	515	408	
Avg. Monthly Payment Amount	\$ 61.13	\$ 55.98	\$ 66.65	\$ 52.95	\$ 57.75	\$ 61.35	\$ 44.01
# of Customers Unable to Keep Payment Plans				5	-	80	
Net Change in Res. Cust.		218	9	216	(78)	115	635
Net Change in Com. Cust.		15	(120)	(98)	175	(89)	96
Net Res. Cust. Disconnections		-	-	-	-	-	-
Running Total % of Res. Cust. Disconnected		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Notes: Atmos--Involuntary Disconnects Moratorium expired on May 31, 2020. Atmos has continued moratorium on voluntary basis.

## COVID-19 AAO Reports --Customer Data (21-EPDE-072-CPL)

### The Empire District Electric Company

	Jul-20	Aug-20	Sep-20	Oct-20
# of Residential Customers	8,191	8,187	8,182	8,177
# of Commercial Customers	1,283	1,434	1,434	1,420
# of Involuntary Disconnects (Res)	-	54	50	29
# of Involuntary Disconnects (Com)	-	1	-	-
# of Reconnections (Res)	-	21	24	18
# of Reconnections (Com)	-	-	-	-
# of Voluntary Disconnects (Res)	135	156	157	140
# of Voluntary Disconnects (Com)	22	8	9	10
Total Arrearages	\$ 889,991	\$ 798,893	\$ 1,003,784	\$ 979,920
# Cust. With Late Accts.	2,742	2,406	3,087	3,096
# of Res. Customers on COVID Payment Plans	42	72	21	11
Avg. Monthly Payment Amount	\$ 163.72	\$ 181.91	\$ 196.05	\$ 165.45
# of Customers Unable to Keep Payment Plans	-	-	-	-
Net Change in Res. Cust.		(4)	(5)	(5)
Net Change in Com. Cust.		151	-	(14)
Net Res. Cust. Disconnections		33	26	11
Running Total % of Res. Cust. Disconnected		0.40%	0.72%	0.86%

Notes:

**CERTIFICATE OF SERVICE**

20-GIMX-393-MIS

I, the undersigned, certify that a true and correct copy of the above and foregoing Notice of Filing of Staff Report and Recommendation was electronically served this 9th day of December, 2020, to the following:

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