

Exhibit No.: 104
Issue(s): Charge Ahead –
EV Program
Witness: Robin Kliethermes
Sponsoring Party: MoPSC Staff
Type of Exhibit: Surrebuttal Testimony
Case No.: ET-2018-0132
Date Testimony Prepared: November 16, 2018

MISSOURI PUBLIC SERVICE COMMISSION
COMMISSION STAFF DIVISION
TARIFF/RATE DESIGN DEPARTMENT

SURREBUTTAL TESTIMONY

OF

ROBIN KLIETHERMES

UNION ELECTRIC COMPANY
d/b/a AMEREN MISSOURI

CASE NO. ET-2018-0132

Jefferson City, Missouri
November 2018

*pages 2, line 7
through page 5,
line 19 were
stricken from
the record
at hearing.
Nancy D'Amico
Sr. Regulatory Law Judge*

Staff

EXHIBIT NO. 104
Date 12-4-18 Reporter NT
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OF
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1 Q. What is Staff's concern with this approach?

2 A. Staff does not object to the concept of addressing risk sharing through a
3 measure of EV adoption, particularly if that adoption is tied in some manner to installations
4 facilitated by the Charge Ahead program. However, Dr. Marke's proposal does not explicitly
5 cap the recovery from ratepayers to 100 % of the cost of the program. Staff recommends that
6 if Dr. Marke's approach is adopted, that an explicit cap be included.¹

7 SUMMARY OF STAFF'S RECOMMENDATION

*Stricken
from record. MB*

8 Q. Could you summarize Staff's recommendation to the Commission in this
9 manner?

10 A. Yes. Staff recommends that the Commission reject Ameren Missouri's
11 requested Charge Ahead – Business Solution Program for several reasons, including the
12 purpose of the program is in direct competition with energy sources provided by other
13 Commission regulated utilities and other statewide programs offer incentives for the same
14 purpose. Staff also recommends that the Commission reject Ameren Missouri's Charge
15 Ahead – Electric Vehicle Programs Corridor Charging Sub-Program since the program is not
16 necessary given other statewide electric vehicle charging programs.² Staff witness Byron
17 Murray provides in more detail Staff's position regarding Ameren Missouri's Charge Ahead –
18 Business Solutions Program and Ameren Missouri's Charge Ahead – Electric Vehicle
19 Programs Corridor Charging Sub-Program in his Rebuttal testimony filed on October 1, 2018
20 in this case.

¹ Staff is not opposed to a reasonable application of carrying costs as discussed in the Supplemental Rebuttal Testimony of Dr. Marke.

² See Byron Murray Rebuttal, page 11.

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1 Regarding the remainder of the Charge Ahead proposal, Staff recommends the
2 Commission order Ameren Missouri to enter into a stakeholder process to develop and file a
3 “Make Ready” tariff to facilitate installation of customer-owned electric vehicle charging
4 stations. Under such a tariff Ameren Missouri would not require line extension charges from
5 a customer seeking a line extension for separately metered electric vehicle charging that meets
6 public policy considerations to be developed with stakeholder input and included in the tariff.³

7 Q. Under this proposal, does Staff define “make ready” differently than
8 Ameren Missouri defines “make ready” in the Charge Ahead program, as proposed?

9 A. Yes. Ameren Missouri uses the term “make ready” to include cost categories
10 of real estate and design services (not real estate purchase), the costs of civil and electrical
11 construction beyond those costs included in the service extension, and costs of installation.
12 Staff understands this definition to exceed what the Commission had contemplated as a
13 “Make-Ready” model in Case No. ER-2016-0285.⁴ For purposes of its recommendation,
14 Staff defines “make ready” to refer only to the costs of the extension of the electric utility’s
15 distribution system from the existing system to the customer’s meter that would otherwise be
16 the customer’s responsibility under the line extension policy.

17 Q. What public policy considerations does Staff recommend including in
18 designing a make ready tariff?

19 A. Staff suggests the following items as a reasonable starting point for discussion
20 in a stakeholder process of developing the tariff:

³ See Staff Report on the Estimated Costs and Benefits of a Make Ready Tariff for Separately-Metered EV Charging, page 1.

⁴ See Byron Murray Rebuttal, page 11.

Make Ready EV Definitions and Terms of Service:⁵

1. Publicly available means parking areas available to the general public with the indicated number of minimum parking spaces available, without permit, for example, parking areas at Parks, Commuter Parking Lots, Public Transportation parking areas, Public Parking Lots and Garages, Shopping Centers, and Retail facilities.
2. Employee parking and residential parking may qualify if parking spots are not assigned, and the indicated minimum parking spaces available requirements are met.
3. Where indicated, the Applicant shall ensure that sufficient measures are in place to reasonably cause EVs to vacate the charging location to enable other EVs to access the charging location.
4. EV charging under this program shall be separately metered from any other customer uses on the premises.
5. The length of extension assumed to be offset for each configuration is provided below:

	Length of Extension (in feet)	Maximum Demand	# of Level 2 Ports	Public Accessibility	Minimum Size	Alternative Employee/Residential Minimum Size	Overstay Requirement	Available Extensions
1000	7	3	75	100	4 Hours	50		
50	7	1	15	30	4 Hours	50		
1000	34	5	100	150	2 Hours	25		
1000	69	10	200	300	2 Hours	25		

Q. Is this intended as a definitive position for what criteria to consider in designing a make-ready model?

A. No. Input from Ameren Missouri is critical to the design of a reasonable implementation. Also, stakeholders may provide valuable insight for balancing the parameters of the program.

⁵ See Staff Report on the Estimated Costs and Benefits of a Make Ready Tariff for Separately-Metered EV Charging, pages 1-2.

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1 Q. What parameters would guide the stakeholder group in the development of this
2 tariff?

3 A. Stakeholders should seek to balance improved public accessibility of EV
4 charging, minimization of free ridership, and potential benefits to other ratepayers through
5 both direct-enabled and accretive marginal revenues.⁶

6 Q. What additional information will be necessary to facilitate this stakeholder
7 process?

8 A. To facilitate this process, Ameren Missouri should prepare a specific budget
9 for each measure, identifying the number of ports to be installed, and the program costs
10 associated with each measure. Ameren Missouri should also provide an estimate of the
11 accretive charging it estimates to be enabled by the subsidized charger installation, and
12 identify any public policy benefits associated with any specific measure.⁷ These budgets and
13 estimates should specify the kW of charging contemplated, or include estimates to reflect the
14 varying infrastructure costs and revenues associated with specified kW levels.⁸

15 Q. What is a reasonable budget for such a make-ready tariff?

16 A. In the context of reasonably designed program for subsidized line extensions
17 Staff does not object to Ameren Missouri's proposed Charge Ahead budget of \$11 million.
18 Further, Staff does not object to some manner of risk sharing as recommended by OPC,
19 limited to the recovery of the actual investment. 118

20 Q. Does this conclude your surrebuttal testimony?

21 A. Yes.

⁶ See Staff Report on the Estimated Costs and Benefits of a Make Ready Tariff for Separately-Metered EV Charging, pages 5 & 7.

⁷ See Sarah Lange Rebuttal, page 12.

⁸ See Staff Report on the Estimated Costs and Benefits of a Make Ready Tariff for Separately-Metered EV Charging, page 5; and Sarah Lange Surrebuttal, page 8-9.

Robin Kliethermes

Present Position:

I am the Rate and Tariff Examination Manager of the Tariff and Rate Design Department, Commission Staff Division, of the Missouri Public Service Commission ("Commission"). I have held this position since July 16th, 2016. I have been employed by the Commission since March of 2012. In May of 2013, I presented on Class Cost of Service and Cost Allocation to the National Agency for Energy Regulation of Moldova ("ANRE") as part of the National Association of Regulatory Utility Commissioners ("NARUC") Energy Regulatory Partnership Program. I am also a member of the Electric Meter Variance Committee.

Educational Background and Work Experience:

I have a Bachelor of Science degree in Parks, Recreation and Tourism with a minor in Agricultural Economics from the University of Missouri – Columbia in 2008, and a Master of Science degree in Agricultural Economics from the same institution in 2010. Prior to joining the Commission, I was employed by the University of Missouri Extension as a 4-H Youth Development Specialist and County Program Director in Gasconade County.

Additionally, I completed two online classes through Bismarck State College: Energy Markets and Structures (ENRG 420) in December, 2014 and Energy Economics and Finance (ENRG 412) in May, 2015.

Previous Testimony of Robin Kliethermes

Case No.	Company	Type of Filing	Issue
ER-2012-0166	Ameren Missouri	Staff Report	Economic Considerations
ER-2012-0174	Kansas City Power & Light Company	Staff Report	Economic Considerations
ER-2012-0175	KCP&L Greater Missouri Operations Company	Staff Report	Economic Considerations & Large Power Revenues
ER-2012-0345	Empire District Electric Company	Staff Report	Economic Considerations, Non-Weather Sensitive Classes & Energy Efficiency
HR-2014-0066	Veolia Kansas City	Staff Report	Revenue by Class and Class Cost of Service
GR-2014-0086	Summit Natural Gas	Staff Report	Large Customer Revenues
GR-2014-0086	Summit Natural Gas	Rebuttal	Large Customer Revenues
EC-2014-0316	City of O'Fallon Missouri and City of Ballwin, Missouri v. Union Electric Company d/b/a Ameren Missouri	Staff Memorandum	Overview of Case
EO-2014-0151	KCP&L Greater Missouri Operations Company	Staff Recommendation	Renewable Energy Standard Rate Adjustment Mechanism (RESRAM)
ER-2014-0258	Ameren Missouri	Staff Report	Rate Revenue by Class, Class Cost of Service study, Residential Customer Charge
ER-2014-0258	Ameren Missouri	Rebuttal	Weather normalization adjustment to class billing units
ER-2014-0258	Ameren Missouri	Surrebuttal	Residential Customer Charge and Class allocations
ER-2014-0351	Empire District Electric Company	Staff Report	Rate Revenue by Class, Class Cost of Service study, Residential Customer Charge

cont'd Previous Testimony of
Robin Kliethermes

Case No.	Company	Type of Filing	Issue
ER-2014-0351	Empire District Electric Company	Rebuttal & Surrebuttal	Residential Customer, Interruptible Customers
ER-2014-0370	Kansas City Power & Light Company	Staff Report	Rate Revenue by Class, Class Cost of Service study, Residential Customer Charge
ER-2014-0370	Kansas City Power & Light Company	Rebuttal & Surrebuttal	Class Cost of Service, Rate Design, Residential Customer Charge
ER-2014-0370	Kansas City Power & Light Company	True-Up Direct & True-Up Rebuttal	Customer Growth & Rate Switching
EE-2015-0177	Kansas City Power & Light Company	Staff Recommendation	Electric Meter Variance Request
EE-2016-0090	Ameren Missouri	Staff Recommendation	Tariff Variance Request
EO-2016-0100	KCP&L Greater Missouri Operations Company	Staff Recommendation	RESRAM Annual Rate Adjustment Filing
ET-2016-0185	Kansas City Power & Light Company	Staff Recommendation	Solar Rebate Tariff Change
ER-2016-0023	Empire District Electric Company	Staff Report	Rate Revenue by Class, CCOS and Residential Customer Charge
ER-2016-0023	Empire District Electric Company	Rebuttal & Surrebuttal	Residential Customer Charge and CCOS
ER-2016-0156	KCP&L Greater Missouri Operations	Staff Report	Rate Revenue by Class, CCOS and Residential Customer Charge
ER-2016-0156	KCP&L Greater Missouri Operations	Rebuttal & Surrebuttal	Data Availability, Energy Efficiency Revenue Adj., Residential Customer Charge
ER-2016-0179	Ameren Missouri	Rebuttal	Blocked Usage
ER-2016-0285	Kansas City Power & Light Company	Rebuttal & Surrebuttal	Clean Charge Network Tariff, Rate Design
GR-2017-0215	Spire (Laclede Gas Company)	Staff Report, Rebuttal & Surrebuttal	Tariff Issues, Rate Design and Class Cost of Service

cont'd Previous Testimony of
Robin Kliethermes

Case No.	Company	Type of Filing	Issue
GR-2017-0216	Spire (Missouri Gas Energy)	Staff Report, Rebuttal & Surrebuttal	Tariff Issues, Rate Design and Class Cost of Service
EC-2018-0103	Kansas City Power & Light	Staff Report	Customer Complaint
EO-2015-0055	Ameren Missouri	Rebuttal	Flex-Pay Program
GR-2018-0013	Liberty	Staff Report	Class Cost of Service and Rate Design Report
ER-2018-0145	Kansas City Power & Light	Staff Report & Rebuttal & Surrebuttal	Tariff Issues, Rate Design, Revenue, Class Cost of Service
ER-2018-0146	KCP&L Greater Missouri Operations	Staff Report & Rebuttal & Surrebuttal	Tariff Issues, Rate Design, Revenue, Class Cost of Service
EO-2018-0211	Ameren Missouri	Staff Rebuttal Report	MEEIA Margin Rates
GO-2019-0059	Spire Missouri West	Staff Recommendation	Weather Normalization Adjustment Rider (WNAR)
GO-2019-0058	Spire Missouri East	Staff Recommendation	Weather Normalization Adjustment Rider (WNAR)

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri for) Case No. ET-2018-0132
Approval of Efficient Electrification Program)

AFFIDAVIT OF ROBIN KLIETHERMES

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW ROBIN KLIETHERMES and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Surrebuttal Testimony*; and that the same is true and correct according to her best knowledge and belief.

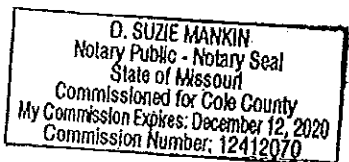
Further the Affiant sayeth not.

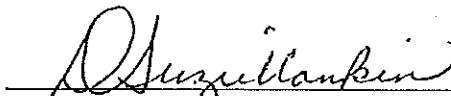


ROBIN KLIETHERMES

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 15th day of November 2018.





Notary Public