Exhibit No. 550

ChargePoint – Exhibit 550
Justin D. Wilson
Direct Testimony
File Nos. ER-2022-0129 & ER-2022-0130

Exhibit:	
Issues:	Transportation Electrification Rates and Programs
Witness:	Justin D. Wilson
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Case Nos.:	ER-2022-0129 and ER-2022-0130
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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's Request for Authority to Implement a General Rate Increase for Electric Service	Case No. ER-2022-0129
In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Request for Authority to Implement a General Rate Increase for Electric Service	Case No. ER-2022-0130

DIRECT TESTIMONY OF JUSTIN D. WILSON ON BEHALF OF CHARGEPOINT, INC.

June 22, 2022

I. Introduction and Summary of Recommendations.

Q: Please state your name.

A: My name is Justin D. Wilson.

Q: By whom are you employed and in what position?

A: I am Director of Utility Partnerships and Regulatory Affairs at ChargePoint, Inc. (ChargePoint).

Q: Please describe your current role and your relevant professional experience.

A: In my current role, I direct ChargePoint's participation in utility programs and our regulatory efforts in North America. I engage on behalf of ChargePoint at utility regulatory commissions and other state agencies to promote public policies that expand electric vehicle infrastructure and advance best practices within the electric vehicle charging industry.

My relevant professional experience appears in my CV, which is attached as Attachment JDW-1.

Q: Please describe ChargePoint.

A: ChargePoint is a world leading electric vehicle (EV) charging network, providing scalable solutions for every charging scenario from home and multifamily to workplace, parking, hospitality, retail, and transport fleets of all types. ChargePoint's cloud subscription platform and software-defined charging hardware is designed to enable businesses to support drivers, add the latest software features and expand fleet needs with minimal disruption to overall business.

ChargePoint's hardware offerings include Level 2 (L2) and DC fast charging (DCFC) products, and ChargePoint provides a range of options across those charging levels for specific use cases including light duty, medium duty, and transit fleets, multi-unit dwellings, residential (multi-family and single family), destination, workplace, and more. ChargePoint's software and cloud services enable EV charging station site hosts to manage charging onsite with features like Waitlist, access control, charging analytics, and real-time availability. With modular design to help minimize downtime and make maintenance and repair more seamless, all products are also UL-listed and CE (EU) certified, and Level 2 solutions are ENERGY STAR® certified.

ChargePoint's primary business model consists of selling smart charging solutions directly to businesses and organizations while offering tools that empower station owners to deploy EV charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven, cloud-enabled capabilities that enable site hosts to better manage their charging assets and optimize services. For example, with those network capabilities, site hosts can view data on charging station utilization, frequency and duration of charging sessions, set access controls to the stations, and set pricing for charging services. These features are designed to maximize utilization and align the EV driver experience with the specific use case associated with the specific site host. Additionally, ChargePoint has designed its network to allow other parties, such as electric utilities, the ability to access charging data and conduct load management to enable efficient EV load integration onto the electric grid.

Q: What is the purpose of your Direct Testimony?

A: The purpose of my Direct Testimony is to provide ChargePoint's analyses and recommendations regarding Evergy Missouri Metro's and Evergy Missouri West's (collectively, Evergy or the Company) transportation electrification proposals. Specifically, my testimony addresses the following proposals from Evergy:

- Residential High Differential Time of Use rate designed for EV drivers (Schedule RTOU-3);
- Separately Metered Electric Vehicle Time of Use residential rate (Schedule RTOU-EV);
- Commercial EV Charger Rebate Program (CRP) (Schedule CEVCR);
- Business EV Charging Service (Schedule BEVCS) pilot rate.

ChargePoint largely supports Evergy's proposals but recommends several key improvements to Schedule RTOU-EV and the CRP that will ensure the programs are effective, encourage participation, and support the competitive market.

Q: Please summarize your recommendations to the Commission.

A: I recommend that the Commission:

- Approve Schedule RTOU-3 as proposed.
- Approve Schedule RTOU-EV with the following modifications:
  - Direct Evergy not to require a separate meter for Schedule RTOU-EV;
  - Reject Evergy's proposed monthly customer charge for this rate schedule;

- Direct Evergy to work with qualified vendors of smart chargers with embedded metering technology to submeter customers' EV charging load for billing purposes for Schedule RTOU-EV.

- Direct Evergy to include information through its Customer Education efforts to encourage customers to ensure they have the ability to program their charging behavior – either with a smart charger or with their vehicle – before signing up for Schedule RTOU-3 or Schedule RTOU-EV.
- Approve the CRP with the following modifications:
  - Direct Evergy to require that chargers be network-capable, ENERGY STAR certified for Level 2, safety certified, and managed charging capable;
  - Direct Evergy to collect only the following data from site hosts (on a monthly basis): number of charging events, total energy (kWh) dispensed, average energy consumption (kWh) per charging event, and average duration of charging events;
  - Direct Evergy not to impose any demand response requirements on DCFCs supported by the CRP;
  - Direct Evergy to allow CRP participants to opt out of particular demand response events as needed;
  - Direct Evergy to subject its CCN chargers to the same demand response requirements that would apply to participants in the CRP.
- Approve Schedule BEVCS as proposed.

II. Evergy's Proposed Schedules RTOU-3 and RTOU-EV.

Q: What will you address in this section of your testimony?

A: In this section of my testimony, I will discuss Evergy's two proposed residential rate schedules designed with EV charging in mind: Schedule RTOU-3 and Schedule RTOU-EV.[1]

Q: Please describe Schedule RTOU-3 and Schedule RTOU-EV.

A: The two proposed rate schedules offer the same energy charges and time-of-use periods. The only difference between the two rates is that Schedule RTOU-3 is a "whole home" rate that applies to a customer's entire load while Schedule RTOU-EV requires a separate meter and applies only to a customer's EV charging load. Schedule RTOU-EV includes a monthly customer charge of $3.25 to cover the cost of the additional meter.[2]

Q: Does ChargePoint support the proposed rate design of Schedules RTOU-3 and RTOU-EV?

A: Yes. ChargePoint appreciates Evergy's efforts to design residential rate options with a very low energy charge during the super off-peak period of midnight to 6 AM. Six hours is sufficient time for most EV drivers to get enough charge to cover typical daily driving needs with a Level 2 charger. The super off-peak energy charge of only $0.03/kWh (rounded) will encourage EV drivers who have the ability to program their charging times to charge during the super off-peak period. Overall, I expect these rates will result in a significant amount of residential EV charging occurring during the super off-peak period,

[1] Original Sheet Nos. 7-7E.

[2] Lutz Direct, page 29, lines 4-5.

which will increase utilization of the grid during periods of low demand. Shifting charging to the period of midnight to 6 AM is a great example of how EV charging can increase utility sales without increasing the utility's fixed costs, which puts downward pressure on rates for all customers. Accordingly, I recommend that the Commission approve the proposed energy charges and proposed time-of-use periods for Schedules RTOU-3 and RTOU-EV.

Q: Are there some EV drivers who will not have the ability to program their charging to occur during the super off-peak period?

A: Yes. EV drivers will need either a smart Level 2 charger or an EV with the necessary programmable functionalities if they want to program their charging to occur during the super off-peak period.

Smart Level 2 chargers are programmable, allowing an EV driver to plug in their vehicle whenever it is convenient for them (such as when they return home from work) but delay charging until the desired time (such as the beginning of the super off-peak period). Level 2 chargers that are not smart are not capable of being programmed to charge on a schedule in this way. Some EVs have similar programmable capabilities as a smart charger, but some EVs do not have such capabilities, including some new EVs currently on the market.

In Case No. ET-2021-0151, ChargePoint recommended that the Commission direct Evergy to require participants in the Residential Customer EV Outlet Rebate Program to

install smart chargers.[3] One of the reasons ChargePoint made this recommendation was to ensure that rebate recipients would be able to program their charging to occur during off-peak periods, which benefits both EV drivers and the grid. Unfortunately, the Commission rejected ChargePoint's recommendation on this point.[4]

I mention this background not to ask the Commission to revisit its decision in Case No. ET-2021-0151 but simply to point out the possibility that a customer may sign up for Schedule RTOU-3 or Schedule RTOU-EV without realizing they have no ability to schedule their charging until after midnight in an automated fashion. A new EV owner who signed up for one of these new rates but did not have a smart charger or an EV with programmable capabilities would need to manually initiate charging (either with a smartphone app or by physically plugging in) at midnight to take advantage of the super off-peak rates. Given that both rate schedules require a year-long commitment, such a customer would likely have a negative customer experience. Accordingly, I recommend that the Commission direct Evergy to include information through its Customer Education efforts to encourage customers to ensure they have the ability to program their charging behavior – either with a smart charger or with their vehicle – before signing up for Schedule RTOU-3 or Schedule RTOU-EV.

[3] Case No. ET-2021-0151, ¶ 35. ChargePoint also recommended that the Commission require chargers be ENERGY STAR certified and have a safety certification.

[4] Case No. ET-2021-0151, page 19.

Q: Does ChargePoint have any concerns that Schedules RTOU-3 and RTOU-EV are not available to customers with onsite distributed generation (DG) such as solar or that take service on Evergy's net metering tariff (Schedule NM)?[5]

A: I have observed that, as a general trend, many early adopters of EVs have also installed solar at their homes. It is unfortunate that any such person in Evergy's service territories would not be able to enjoy the benefits of the super off-peak rate offered by Schedules RTOU-3 and RTOU-EV. Evergy's proposed restriction would also artificially limit the number of EV drivers who would have a financial incentive to charge during super off-peak hours.

I appreciate that Evergy made extensive efforts to design a time-of-use rate schedule that accommodates net metering, as described by Evergy's witness Mr. Lutz, but it is unfortunate that Evergy did not propose such a rate in this case.[6] I am not intimately familiar with the rules and statutes pertaining to net metering in Missouri, so I cannot comment on whether they in fact pose the challenges to offering time-of-use rates to net metering customers that Mr. Lutz describes. However, as a practical matter I am aware that Xcel Energy, which serves my home in Colorado, has allowed net metering customers to take service on its pilot residential time-of-use rate for several years and is in the process of transitioning all residential customers, including net metering customers, to time-of-use rates.

[5] Sheet Nos. 7B and 7D.

[6] Lutz Direct, pages 29-33.

At this time, ChargePoint takes no position on Evergy's proposal to restrict customers with onsite DG from taking service on Schedule RTOU-3 or Schedule RTOU-EV. However, ChargePoint may take a position if other parties propose solutions to the obstacles Evergy believes prevents it from allowing onsite DG customers from taking service on these rate schedules.

Q: Does ChargePoint support Evergy's proposal to offer Schedule RTOU-3 as a whole-home option and Schedule RTOU-EV as a dedicated EV charging rate?

A: Whole-home rates designed to encourage customers to charge their EVs during off-peak times can be challenging for some customers who are unable to shift certain loads outside of the on-peak periods. For example, customers with electric ovens and ranges or customers with medical conditions that require them to have air conditioning on at all times during hot days may not be able to avoid the 4-8 PM summer on-peak period Evergy has proposed for Schedules RTOU-3 and RTOU-EV. For such customers, the benefits of charging their EV during super off-peak hours may not outweigh the cost of running essential appliances during on-peak periods. Accordingly, ChargePoint supports Evergy's proposal to offer these two rate schedules with identical energy charges and time-of-use periods as both a whole-home option (Schedule RTOU-3) and as a dedicated EV charging option (Schedule RTOU-EV).

However, offering a dedicated EV charging rate like Schedule RTOU-EV does not necessarily require a separate meter, as Evergy has proposed to require at a cost of $3.25 per month. Unfortunately, this monthly cost will erode some of the savings EV drivers will achieve by charging during super off-peak periods and will likely discourage participation

in Schedule RTOU-EV. Fortunately, this monthly cost could be avoided if Evergy were to rely on meters embedded in smart Level 2 chargers for Schedule RTOU-EV.

Q: Can smart chargers be used to meter EV charging consumption separately from customers' other household loads?

A: Yes. Several utilities are using or will soon be using smart residential EV charging stations to meter EV charging load, which allows the utility to bill customers for the electricity consumption of their EV separately from their other usage. Baltimore Gas & Electric (BG&E) in Maryland,[7] Xcel Energy in Minnesota[8] and Wisconsin,[9] and San Diego Gas & Electric (SDG&E)[10] in California are among the utilities that currently use embedded metering in EV charging stations for customer billing in connection with EV-specific rates. The New Hampshire Public Utilities Commission recently required Eversource to develop a pilot that relies on embedded metering for the purpose of offering residential time-of-use rates.[11]

Metering embedded in smart charging stations can provide the following important capabilities to satisfy utility and customer needs while maintaining security:

[7] MD PSC Docket No. 9478, Order No. 88997 (January 14, 2019) ("the Commission directs the Utilities to utilize the "smart" features of such technology to their maximum potential, like advanced metering, to develop and implement time variant rate, load management, and demand response programs").

[8] *See* Northern States Power Company, Order Approving Pilot Program at 2, 5, Minn. PUC Docket No. E002/M-17-817 (May 9, 2018).

[9] *See* Northern States Power Company-Wisconsin, Final Decision, Wisc. PSC Docket No. 4220-TE-104 (July 16, 2020).

[10] *See* https://www.cpuc.ca.gov/general.aspx?id=7728.

[11] New Hampshire PUC, Docket No. DE 20-170, Order Approving Electric Vehicle Time of Use Rates, Order No. 26,604, page 26 (April 7, 2022).

- Precise accuracy across all supported current and temperature ranges;
- Measurement of energy delivered to vehicle only, separate from any other loads;
- Granular clock-aligned interval data;
- Capability to receive remote firmware updates;
- Real-time power monitoring;
- Secure communication between the charging station and a utility or third-party server;
- Local storage of charging data on the charging station; and
- Compliance with cybersecurity requirements.

Relying on embedded meters in smart chargers to measure EV charging consumption can provide savings for utilities and customers compared to installing separate utility meters. I note that I provided this information on embedded metering in Evergy's transportation electrification portfolio applications in Kansas,[12] so Evergy is aware of the capabilities of embedded meters in smart chargers.

Q: Please explain your recommendation with respect to Schedule RTOU-EV and embedded metering.

A: I recommend that the Commission direct Evergy not to require a separate meter for Schedule RTOU-EV and reject Evergy's proposed monthly customer charge for this rate schedule. Instead of requiring a separate meter, the Commission should direct Evergy to work with qualified vendors of smart chargers with embedded metering technology to submeter customers' EV charging load for billing purposes for Schedule RTOU-EV. Rather than require separate meters, Evergy should require customers to have a qualified smart charger to participate in Schedule RTOU-EV.

[12] Kansas Corporation Commission Docket No. 21-IKME-320-TAR, Cross Answering Testimony of Justin D. Wilson, pages 18-19 (July 2, 2021).

III. Evergy's Proposed CRP.

Q: What will you address in this section of your testimony?

A: In this section of my testimony, I will explain ChargePoint's reasons for largely supporting Evergy's proposed Commercial EV Charger Rebate Program (CRP), which appears in Schedule CEVCR. I also recommend several modifications to this program that will improve its effectiveness.

Q: Generally speaking, does ChargePoint believe it is appropriate for Evergy to provide rebates to cover the cost of installing an EV charging station behind a customer's meter?

A: Yes. I recognize that behind-the-meter assets have traditionally been the responsibility of customers and that utilities typically do not own or pay for facilities on the customer side of the meter. However, as far as I am aware, treating the customer meter as the point of demarcation of responsibility is a result of tradition and not of any particular law. In approving Evergy's Residential Customer EV Outlet Program in Case No. ET-2021-0151, the Commission implicitly recognized that it can be appropriate for the utility to provide incentives for behind-the-meter assets, at least on a pilot basis.[13]

Q: How did ChargePoint evaluate Evergy's proposed CRP?

A: As a provider of electric vehicle charging hardware and software services with numerous potential and existing customers in Evergy's territory, ChargePoint takes great care to evaluate transportation electrification programs for their impact on the competitive market

[13] Case No. ET-2021-0151, Report and Order, pages 15-16.

for charging hardware and software services. In particular, ChargePoint advocates for utility program designs that promote innovation, competition, and customer choice because these are some of the most important benefits that a competitive market provides to both EV drivers and EV charging station site hosts. (I use the term "site host" to refer to the owner or lessor of the property on which an EV charging station is located. Site hosts include residential customers; owners of multi-family housing (MFH); commercial customers that offer charging to the public, their customers, and/or their employees; fleet owners; and government entities.)

In the competitive marketplace for EV charging services, site hosts select the technologies they prefer in an open market, invest their own capital, seek any incentives available through public agencies or utilities, and, in the case of commercial stations, offer competitive charging services to attract drivers and recoup necessary expenses. For their part, charging hardware, software, and service providers innovate new hardware, software, and service offerings to enable site hosts to choose the products and services that will best meet their needs. These providers compete to offer site hosts the best products to meet their needs at reasonable cost. In competitive markets, utilities can support site hosts and charging hardware, software, and service providers by developing programs that make it less costly and easier for site hosts to install charging equipment and provide charging services. When utilities encourage competition in the market, charging providers will develop innovative hardware, software, and services solutions to provide to site hosts. Rebate programs such as Evergy has proposed support this competitive market for EV

charging hardware, software, and commercial charging services by reducing the total cost of installing EV charging stations.

Q: Please describe the key components of Evergy's proposed rebate offerings.

A. For the CRP, Evergy proposes to provide site hosts with rebates of $2,500 per port for Level 2 and $20,000 per unit for DCFCs to cover both customer-side infrastructure (also known as make-ready infrastructure) and EV charger equipment costs, up to a specified maximum rebate amount per site depending on the type of site.[14] For the Commercial Rebate program, Evergy plans to develop a list of qualified Level 2 and DCFC chargers.[15] Evergy did not specify how it would develop the list of qualified chargers, but I recommend the Commission direct Evergy to use the same technical specifications it proposed in its transportation electrification portfolio in Case No. ET-2021-0151 – namely, that Evergy require that chargers be network-capable, ENERGY STAR certified for Level 2, safety certified, and managed charging capable.[16] Evergy also proposes to require site hosts to provide Evergy with access to utilization data, install chargers in dedicated EV charging spaces, and agree to participate in potential future demand response (DR) events.[17]

Q: Does ChargePoint support Evergy's CRP proposal?

A: ChargePoint conditionally supports the CRP proposal if the Commission adopts the program modifications and clarifications I recommend below. At a high level, Evergy's

[14] Sheet No. 55C.

[15] Sheet No. 55D.

[16] Case No. ET-2021-0151, Evergy Transportation Electrification Portfolio Filing Report, updated 5-7-2021 (TEP), page 24 and Appendix A.

[17] Sheet No. 55D.

proposed CRP rebates will reduce site hosts' total cost of installing EV chargers at their place of business or multi-family building and the utility will be able to generate additional kWh sales by increasing charging station deployment and encouraging EV adoption. Evergy's proposed program design will allow customers to choose the charging equipment and network services that best fit their needs from a list of qualifying equipment at a reasonable price. In short, by promoting customer choice in charging equipment and services and reducing the cost of installing EV charging stations, Evergy's proposed CRP will support transportation electrification in its Missouri service territories.

However, I am concerned that two of Evergy's proposed program requirements will discourage participation and undermine the success of the program.

Q: What is the first program requirement that concerns you?

A: First, I am concerned that Evergy proposes to require site hosts to "provide Evergy with access to utilization data."[18] Evergy does not explain why it needs charger utilization data other than that it will allow Evergy to "better understand where EV charging is occurring on the system."[19] I believe requiring site hosts to provide all utilization data, without restriction, is needlessly burdensome and raises potential competitive concerns. Site hosts might incur additional network service fees to share their charging data with Evergy to meet this proposed requirement. Many site hosts consider EV charger data to be competitively sensitive and may be discouraged from participating in the program by a requirement that they share all utilization data. Such concerns are understandable given

[18] Sheet No. 55D.

[19] Winslow Direct, page 56, lines 10-12.

that Evergy operates its own EV charger network, the Clean Charge Network (CCN), and could use utilization data from other site hosts to gain a competitive advantage for the CCN. Finally, while I understand Evergy's motivation to understand where EV charging is occurring on its system, it can already do so for its CCN network and it can do so for many third party-owned chargers through its own meter data. Though Evergy has not proposed to require site hosts that participate in the Commercial Rebate program to take service on one of its EV charging rates, any site host that chooses to take service on one of the EV charging rates is required to separately meter their EV charging stations. Evergy will be able to "better understand where EV charging is occurring on the system" by analyzing the meter data from customers that take service on the Electric Transit Service Rate or the Business EV Charging Service Rate.

Further, I am concerned that Evergy's data collection proposal is overly broad because it is not clear exactly what type of data Evergy considers to be "utilization data." ChargePoint would not be concerned by Evergy collecting data regarding the total amount of energy delivered by chargers supported by the CRP or the number of charging sessions, though, again, Evergy can collect this data from its own meters if the chargers are separately metered. However, utilization data should not include any data about the EV drivers that are utilizing third party-owned chargers. For example, charging network operators may collect personally identifiable information about EV drivers for billing purposes, including driver name, address, email address, and credit card information. Evergy should not be permitted to collect this type of data from chargers supported by the CRP.

Q: What do you recommend with respect to Evergy's proposal to collect charger utilization data?

A: If the Commission approves Evergy's proposal to collect data from chargers supported by the CRP, I recommend the Commission direct Evergy to collect only the following data from site hosts (on a monthly basis):

- Number of charging events,
- Total energy (kWh) dispensed,
- Average energy consumption (kWh) per charging event, and
- Average duration of charging events.

Q: What is the second program requirement that concerns you?

A: Second, I am concerned that Evergy proposes to require site hosts to "agree to participate in potential future demand response (DR) events, if deemed necessary, to minimize grid impacts."[20] When this same issue was litigated in Case No. ET-2021-0151, ChargePoint stated in its Initial Brief that our concerns had been resolved by the clarifications and commitments that Evergy's witness made in rebuttal and at hearing.[21] It is unclear if Evergy is willing to make the same clarifications and commitments that it made in Case No. ET-2021-0151, so I will explain ChargePoint's concerns here.

While I support requiring chargers to have managed charging capabilities (including demand response capabilities) as a technical requirement, I oppose requiring customers to agree upfront to participate in any demand response events that might be

[20] Sheet No. 55D.

[21] Case No. ET-2021-0151, ChargePoint Initial Brief, pages 8-9.

"deemed necessary." Evergy has not provided any details regarding such potential demand response events, including the number of events that might be called per year, the duration of demand response events, whether site hosts will be required to reduce charging demand or cease charging activity altogether, whether site hosts would be compensated for reducing demand, and whether site hosts would be able to opt out of such events. Evergy has also not specified whether it would have discretion to deem demand response events as necessary, or if such events would be subject to Commission oversight. In short, because Evergy has not provided any details on these "potential future demand response events," customers would not know what they are signing up for.

While some site hosts will have relatively flexible EV charging loads that can respond to demand response events, many site hosts would not be able to participate in demand response without creating negative driver experiences. For example, a fueling center that installs DCFCs might be unwilling to participate in a demand response program if doing so requires the fueling center to make the DCFC unavailable for use for the duration of each demand response event. An EV driver that arrives at the fueling center in need of a charge will be understandably frustrated if they are forced to wait until the demand response event is over before they can charge up and continue on their journey. Such a driver is likely to blame the fueling center for their inconvenience, not Evergy. For these reasons, the proposed demand response requirement is likely to persuade this hypothetical fueling center against participating in Evergy's CRP, with the likely result that the fueling center may not install DCFCs at all.

The ability to use EV charging stations to participate in demand response events is one of the many benefits of electrifying transportation. However, participation in demand response events should be strictly voluntary and, at the very least, site hosts must be informed about the details of demand response events (such as the number of events per year, duration of events, and participation/compliance requirements) before they agree to participate.

Q: What commitments and clarifications did Evergy make in Case No. ET-2021-0151 that resolved ChargePoint's concerns in that case?

A: As described in ChargePoint's Initial Brief in Case No. ET-2021-0151, Evergy agreed in rebuttal not to impose any demand response requirements on Commercial Rebate recipients that install DCFCs.[22] ChargePoint supports this commitment and recommends that the Commission approve it as a condition of approving the CRP in this proceeding. Specifically, ChargePoint recommends that the Commission direct Evergy not to impose any demand response requirements on DCFCs supported by the CRP.

As also described in ChargePoint's Initial Brief in Case No. ET-2021-0151, in the hearing in that case Evergy clarified that rebate recipients would not be expected to participate in every demand response event that is called and would have the ability to opt out if needed.[23] Allowing site hosts to opt out of particular demand response events will provide site hosts with the flexibility they need to ensure positive customer experiences for EV drivers and provide grid benefits through participation in the program. ChargePoint

[22] Case No. ET-2021-0151, ChargePoint Initial Brief, page 8.

[23] Case No. ET-2021-0151, ChargePoint Initial Brief, page 9.

supports this commitment and recommends that the Commission approve it as a condition of approving the CRP in this proceeding. Specifically, ChargePoint recommends that the Commission direct Evergy to allow CRP participants to opt out of particular demand response events as needed.

Finally, as also described in ChargePoint's Initial Brief in Case No. ET-2021-0151, Evergy clarified at hearing in that case that Evergy's CCN chargers will be subject to the same demand response requirements that apply to CRP rebate recipients.[24] Subjecting Evergy-owned chargers to the same requirements ensures that the demand response requirement does not create a competitive advantage for the CCN chargers that other site hosts would not have. This clarification would help promote a level playing field between CRP rebate recipients that offer public charging and Evergy's CCN chargers. ChargePoint supports this commitment and recommends that the Commission approve it as a condition of approving the CRP in this proceeding. Specifically, ChargePoint recommends that the Commission direct Evergy to subject its CCN chargers to the same demand response requirements that would apply to participants in the CRP.

Q: Why did the Commission deny Evergy's request for the CRP in Case No. ET-2021-0151?

A: In its Report and Order in that case, the Commission first found:

> The EV chargers currently served under the tariff implementing the Clean Charging Network do not generate sufficient revenues to cover the revenue requirement caused by the Clean Charging Network's infrastructure and related costs. There is concern that subsidization of a new charger in close proximity to the existing Clean Charging Network through a rebate would

[24] Case No. ET-2021-0151, ChargePoint Initial Brief, page 9.

> dilute the use of the existing charger stations. With the same amount of charging revenue being derived from a greater level of investment, an additional revenue requirement would be caused.

The Commission then concluded:

> The Commission is not opposed to the concept of a commercial EV charger rebate program, but Evergy has failed to demonstrate that such a program is needed in its service territories. The existing Clean Charging Network appears to be sufficient to meet charging needs at this time, and in the near future Missouri expects to receive a large infusion of federal funding to support expansion of an EV charging network. Based upon the record, there is no evidence that a commercial EV charger rebate program is needed and it will not be approved.[25]

Q: Do you believe these concerns have been addressed in this proceeding?

A: Yes. As an initial matter, I believe the Commission's concern that third-party site hosts that participate in the CRP will reduce Evergy's revenues from CCN chargers is misplaced. It is important to remember that the CCN network is a utility investment in a competitive service offering. ChargePoint applauds Evergy's efforts to support third-party site hosts with CRP rebates that will reduce the cost of installing and hosting EV charging stations for the benefit of EV drivers and all Evergy customers. Given that Evergy has already made its own investment in the CCN, it is both appropriate and necessary for Evergy to support the competitive market with the CRP.

As Evergy points out, site hosts that receive CRP rebates will be responsible for a substantial portion of the total investment to deploy charging stations, so the risk of free ridership is low.[26] Further, site hosts are unlikely to deploy charging stations in locations

[25] Case No. ET-2021-0151, Report and Order, page 23.

[26] Winslow Direct, page 59, lines 10-13.

immediately adjacent to existing CCN chargers unless they believe there is sufficient charging demand to justify the investment. Because CCN chargers have already been deployed, third-party owned chargers supported by the CRP can be expected to complement – and not duplicate – the existing CCN network. ChargePoint respectfully submits that it would be misguided to reject the CRP for the purpose of protecting Evergy's CCN investment.

I also agree with Evergy that federal funding from the Infrastructure Investment and Jobs Act (IIJA) should be viewed as complementary to the CRP, not duplicative.[27] Not all prospective site hosts that would benefit from CRP will necessarily qualify for grant funding through the IIJA.

Q: Please summarize your recommendations for the CRP.

A: I recommend that the Commission approve the CRP with the following recommendations:

- Direct Evergy to require that chargers be network-capable, ENERGY STAR certified for Level 2, safety certified, and managed charging capable;
- Direct Evergy to collect only the following data from site hosts (on a monthly basis): number of charging events, total energy (kWh) dispensed, average energy consumption (kWh) per charging event, and average duration of charging events;
- Direct Evergy not to impose any demand response requirements on DCFCs supported by the CRP;

[27] Winslow Direct, pages 62-63.

- Direct Evergy to allow CRP participants to opt out of particular demand response events as needed;
- Direct Evergy to subject its CCN chargers to the same demand response requirements that would apply to participants in the CRP.

IV. Evergy's Proposed Schedule BEVCS.

Q: What will you address in this section of your testimony?

A: In this section of my testimony, I will discuss Evergy's proposed Business EV Charging Service rate, which appears in Schedule BEVCS. This rate features significantly reduced demand charges, as well as on-peak and off-peak energy charges to encourage EV charging to occur during off-peak hours.[28] The BEVCS rate also has a "super off-peak period" with a very low rate for charging.[29] The rate is substantially the same as the Business EV Charging Service rate that Evergy proposed in Case No. ET-2021-0151.

Q: What is ChargePoint's position on Evergy's proposed BEVCS?

A: ChargePoint supports Evergy's proposed BEVCS rate. Demand charges can pose a significant challenge and expense for EV charging station site hosts, especially when utilization of the charger is low, which is often the case currently as EV adoption is still relatively low. In low utilization scenarios, a site host may experience a relatively small number of charging sessions in a month, but if several vehicles charge at the same time, the demand charge will be set for the entire month (or potentially much longer if there is a

[28] Sheet No. 54.

[29] Sheet No. 54.

demand ratchet provision). While moving to time-of-use rates may not be the ideal solution to mitigate demand charges for public DCFC site hosts, which often have little control over when drivers want to charge, I support Evergy's proposed rate design.

Q: Do you have any other comments on Schedule BEVCS?

A: Yes, I appreciate that Evergy proposed that Schedule BEVCS be optional for customers. While I expect many EV charging station site hosts will find the rates beneficial, they may not be suited to all customers' unique needs and goals for installing chargers. Site hosts should be allowed to choose whether to take service on Schedule BEVCS or stay on their otherwise applicable rate schedule. I also appreciate that site hosts that sign up for Schedule BEVCS can opt out and return to another applicable rate after one year. This flexibility is important as EV adoption grows because, while tariffs with demand charges pose challenges at low utilization rates, tariffs with demand charges and lower kWh charges can be beneficial when utilization increases.

Q: Why did the Commission reject the Business EV Charging Service rate in Case No. ET-2021-0151?

A: In its Report and Order in that case, the Commission stated that there were "many unanswered questions about the details" of the rate and that since Evergy was intending to file a rate case (this proceeding) in the near future, it rejected the rate at the time.[30]

[30] Case No. ET-2021-0151, page 33.

Q: Do you believe Schedule BEVCS should be approved in this proceeding?

A: Yes. My understanding is that the "unanswered questions" to which the Commission referred in Case No. ET-2021-0151 arose as a result of Evergy proposing the rate outside a rate case. Given that this proceeding is a general rate case, I believe these issues can and should be resolved and the rate should be approved.

Q: What do you recommend?

A: I recommend that the Commission approve Evergy's Schedule BEVCS as proposed.

V. Conclusion and Recommendations.

Q: Please summarize your recommendations for the Commission.

A: As stated at the beginning of my testimony, I recommend that the Commission:

- Approve Schedule RTOU-3 as proposed.
- Approve Schedule RTOU-EV with the following modifications:
  - Direct Evergy not to require a separate meter for Schedule RTOU-EV;
  - Reject Evergy's proposed monthly customer charge for this rate schedule;
  - Direct Evergy to work with qualified vendors of smart chargers with embedded metering technology to submeter customers' EV charging load for billing purposes for Schedule RTOU-EV.
- Direct Evergy to include information through its Customer Education efforts to encourage customers to ensure they have the ability to program their charging behavior – either with a smart charger or with their vehicle – before signing up for Schedule RTOU-3 or Schedule RTOU-EV.
- Approve the CRP with the following modifications:

- Direct Evergy to require that chargers be network-capable, ENERGY STAR certified for Level 2, safety certified, and managed charging capable;
- Direct Evergy to collect only the following data from site hosts (on a monthly basis): number of charging events, total energy (kWh) dispensed, average energy consumption (kWh) per charging event, and average duration of charging events;
- Direct Evergy not to impose any demand response requirements on DCFCs supported by the CRP;
- Direct Evergy to allow CRP participants to opt out of particular demand response events as needed;
- Direct Evergy to subject its CCN chargers to the same demand response requirements that would apply to participants in the CRP.

- Approve Schedule BEVCS as proposed.

Q: Does this conclude your testimony at this time?

A: Yes.

Justin Wilson

Employment History

ChargePoint, Inc., April 2019 - Present
Director, Utility Partnerships and Regulatory Affairs (2022-Present)
Responsible for ChargePoint's participation in utility programs and executing regulatory strategies to promote electric vehicle charging solutions for businesses, utilities, and electric vehicle drivers.

Director, Public Policy (2019-2022)
Responsible for developing and executing regulatory and legislative strategies to promote electric vehicle charging solutions for businesses, utilities, and electric vehicle drivers.

Wilson Political Solutions, LLC, 2018 - 2019
Owner/Member
Provide political and policy expertise to a wide-range of clients including clean energy trade associations and non-profit advocacy organizations.

Clean Energy Collective, 2016 – 2018
Director of Policy and New Markets
Responsible for leading the Company's state-based efforts to expand community solar programs across the U.S., engage federal policy makers on tax and trade issues, and serve as a policy expert on state regulatory matters.

Western Clean Energy Campaign, 2008 - 2016
Executive Director, 2008 - 2016
Responsible for organization's success in the development and implementation of strategies to transition the electric power system in the Western US from primary reliance on fossil fuels to a system advancing renewable energy technologies.

Grassroots Campaigns, Inc., 2004 – 2008
Lead Organizer
Responsible for the implementation of statewide and regional campaigns that educated voters on policy issues and encouraged participation in congressional and presidential elections.

Education

- University of Arkansas (Fayetteville, AR), 2003, B.S. in Public Administration
- University of Colorado Denver (Denver, CO), 2016, Masters in Public Administration, Environmental Policy, Management, and Law Concentration

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's Request for Authority to Implement a General Rate Increase for Electric Service	Case No. ER-2022-0129
In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Request for Authority to Implement a General Rate Increase for Electric Service	Case No. ER-2022-0130

DECLARATION OF JUSTIN D. WILSON

County of Denver)
) ss
State of Colorado)

Justin D. Wilson, being duly sworn, deposes and says that the information contained in the attached Direct Testimony of Justin D. Wilson on behalf of ChargePoint, Inc. was prepared by him or under his direction and direct supervision.

Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.

Justin D. Wilson

ChargePoint, Inc. (ChargePoint)

State of Colorado County of Denver
Subscribed and sworn before me on 06/21/2022 (Date)

(Notary Signature)

DYLAN SCOTT DUNN
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20214029135
MY COMMISSION EXPIRES JULY 21, 2025