Exhibit No.:

Issue(s): Electric Vehicle

Charging Programs

Witness: Robin Kliethermes

Sponsoring Party: MoPSC Staff

Type of Exhibit: Surrebuttal Testimony

Case No.: ET-2021-0151

Date Testimony Prepared: September 13, 2021

MISSOURI PUBLIC SERVICE COMMISSION INDUSTRY ANALYSIS DIVISION TARIFF/RATE DESIGN DEPARTMENT

SURREBUTTAL TESTIMONY

OF

ROBIN KLIETHERMES

EVERGY METRO, INC., d/b/a Evergy Missouri Metro and EVERGY MISSOURI WEST INC., d/b/a Evergy Missouri West

CASE NO. ET-2021-0151

Jefferson City, Missouri September 2021

1	SURREBUTTAL TESTIMONY				
2	OF				
3	ROBIN KLIETHERMES				
4	CASE NO. ET-2021-0151				
5	Q. Please state your name and business address.				
6	A. Robin Kliethermes, 200 Madison Street, Jefferson City, MO 65102.				
7	Q. By whom are you employed and in what capacity?				
8	A. I am employed by the Missouri Public Service Commission ("Commission")	as			
9	the Regulatory Compliance Manager of the Tariff and Rate Design Department of the Indust	ry			
10	Analysis Division.				
11	Q. Have you previously filed testimony in this case?				
12	A. Yes. I previously filed testimony in Staff's Rebuttal Report in this case.				
13	Q. What is the purpose of your surrebuttal testimony?				
14	A. The purpose of my surrebuttal testimony is to respond to ChargPoint, Inc.	e's			
15	witness Justin D. Wilson regarding his recommended modifications to Evergy's proposed				
16	electric vehicle (EV) charging program.				
17	Q. What are Staff's concerns with Mr. Wilson's recommendations for the	he			
18	Residential Programs?				
19	A. Mr. Wilson's recommendations regarding the Residential rebate programs of	do			
20	not alleviate Staff's concerns regarding free ridership and unmanaged EV charging. Althoug	ζh,			
21	Mr. Wilson recommends Evergy allow a residential customer to choose to use part of the	he			
22	proposed rebate towards the actual purchase and installation of an L2 Charger, he does n	ıot			
23	recommend this as a requirement to participate in the program. Further, Mr. Wilson does n	ıot			

recommend Residential customers that participate in the program to also participate in Evergy's currently effective time-of-use rates. As discussed in Staff's Rebuttal Report, EV charging that is not managed will likely occur during expensive peak hours, which will likely increase the Company's cost to serve the load of its customers and those costs will be borne by all ratepayers through the Company's Fuel Adjustment Clause (FAC), not just EV charging customers or program participants.

Q. What are Staff's concerns with Mr. Wilson's recommendations for the Commercial Rebate Program?

In regard to Evergy's Commercial Rebate program, Staff is concerned with Mr. Wilson's recommendation to remove Evergy's requirement that rebate recipients participate in demand response. As mentioned above, if EV charging is not managed it is likely to occur during expensive peak hours. Further, without this requirement, Evergy's EV charging program will contradict rebates funded by ratepayers through Evergy's energy efficiency programs. Evergy's energy efficiency programs, established under the Missouri Energy Efficiency Investment Act (MEEIA), incentivizes customers to use less energy by offering rebates on efficient products or manage energy use through participation in residential and commercial demand response programs.

- Q. Does Staff have a concern regarding Mr. Wilson's recommendation to remove Evergy's requirement that Commercial program participants provide charging information to Evergy?
- A. Yes. Having access to EV charging data will help to understand when EV charging occurs and will help to develop cost based rates for all customers.

¹ Page 8 through 15 of Staff's Rebuttal Report.

1	Q.	What are Mr. Wilson's recommendations regarding the expansion of Evergy's			
2	Clean Charge Network (CCN)?				
3	A.	Mr. Wilson does not oppose Evergy's proposed expansion as long as there are			
4	parameters to	support a competitive market for EV charging services. These parameters include			
5	allowing site	hosts to choose the EV charging hardware and network service provider and to			
6	set the prices paid by drivers.				
7	Q.	Does Staff have any concerns with Mr. Wilson's recommendations?			
8	A.	Yes. Ultimately, Mr. Wilson is recommending the site hosts select the charging			
9	hardware that	will be owned, operated, and maintained by Evergy. Site hosts have the flexibility			
10	to work with	Evergy within the parameters set forth in the Commission approved tariff			
11	(Clean Charge Network Schedule CCN), to host competitive providers, or own and operate				
12	their own stations.				
13	Q.	What is Staff's recommendation regarding Evergy's proposed EV charging			
14	program?				
15	A.	Staff recommends the Commission reject the Company's tariffs as filed for			
16	reasons stated	in its rebuttal report. However, if the Commission approves the Company's EV			
17	charging program tariffs, Staff recommends the Commission:				
18		- require residential program participants to purchase and install L2 Chargers;			
19 20		-require residential program participants to be served on the Company's currently effective time-of-use rates;			
21 22 23		- adjust the program budget levels to a level proportionate with other EV charging programs and limit the percent of the budget to be spent on administration and education; and			
24		- require program budget levels to be inclusive of line extension costs.			

Surrebuttal Testimony of Robin Kliethermes

However, under no circumstances can Staff recommend the Commission approve the Company's proposed transportation rate schedules² or the expansion of the CCN beyond the inclusion of the KC streetlight corridor project.

- Q. Does this conclude your testimony?
- 5 A. Yes.

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² Proposed Original Tariff Sheet No. 158 and 159.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

*		
In the Matter of the Application of)	
Evergy Metro, Inc. d/b/a Evergy)	Case No. ET-2021-0151
Missouri Metro and Evergy Missouri)	
West, Inc. d/b/a Evergy Missouri West)	
for Approval of a Transportation)	
Electrification Portfolio)	

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 of Robin Kliethermes*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

ROBIN KLIETHERMES

JURAT

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070

Notary Public