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Charging Programs
Witness: *Robin Kliethermes*
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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 recommend Residential customers that participate in the program to also participate in Evergy's
2 currently effective time-of-use rates. As discussed in Staff's Rebuttal Report,¹ EV charging that
3 is not managed will likely occur during expensive peak hours, which will likely increase the
4 Company's cost to serve the load of its customers and those costs will be borne by all ratepayers
5 through the Company's Fuel Adjustment Clause (FAC), not just EV charging customers or
6 program participants.

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

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

18 Q. Does Staff have a concern regarding Mr. Wilson's recommendation to
19 remove Evergy's requirement that Commercial program participants provide charging
20 information to Evergy?

21 A. Yes. Having access to EV charging data will help to understand when
22 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 -require residential program participants to be served on the Company's
20 currently effective time-of-use rates;

21 - adjust the program budget levels to a level proportionate with other EV
22 charging programs and limit the percent of the budget to be spent on
23 administration and education; and

24 - require program budget levels to be inclusive of line extension costs.

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

4 Q. Does this conclude your testimony?

5 A. Yes.

² Proposed Original Tariff Sheet No. 158 and 159.

