

Exhibit No.:
Issue: *Clean Charge Network
Ratepayer Recovery of Expenses*
Witness: *Byron M. Murray*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Rebuttal Testimony*
Case Nos.: *ER-2018-0145 and
ER-2018-0146*
Date Testimony Prepared: *August 7, 2018*

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

TARIFF / RATE DESIGN

REBUTTAL TESTIMONY

OF

BYRON M. MURRAY

**KANSAS CITY POWER & LIGHT COMPANY
CASE NO. ER-2018-0145**

and

**KCP&L GREATER MISSOURI OPERATIONS
CASE NO. ER-2018-0146**

*Jefferson City, Missouri
August 2018*

1 **EXECUTIVE SUMMARY**

2 Q. What is the purpose of your rebuttal testimony in this proceeding?

3 A. The purpose of my rebuttal testimony is to address Kansas City Power & Light
4 Company's ("KCPL") and KCP&L Greater Missouri Operations Company's ("GMO")
5 (collectively, "Company") requested approval of the Clean Charge Network ("CCN")
6 Schedule CCN Tariff, discussed by Company witness Mr. Tim M. Rush's direct testimony.

7 **RESPONSE TO THE CLEAN CHARGE NETWORK SCHEDULE CCN TARIFF**

8 Q. What is Staff's recommendation regarding KCPL's and GMO's Schedule CCN
9 tariff as it is currently proposed?

10 A. Staff recommends that the Commission reject KCPL's and GMO's requested
11 tariff sheets.

12 Q. Has the Commission previously provided guidance on electric vehicle ("EV")
13 charging?

14 A. Yes. In its Report and Order for Case No. ER-2016-0285, the Commission
15 determined that EV charging stations are not "electric plant" as defined by statute, and thus it
16 lacks authority to regulate their operation.¹

17 However, the Western District Court of Appeals issued an order on August 7, 2018,
18 finding that EV charging stations are "electric plant", stating the following:

19 We conclude, however, that the Commission erred when it held that
20 KCP&L's electric vehicle charging stations did not fall within the
21 statutory definition of "electric plant." We accordingly reverse that

¹ *Report and Order*, issued May 3, 2017, p. 45.

1 aspect of the Commission's Report and Order, and remand the case to
2 the Commission for further proceedings consistent with this opinion.²

3 Staff is still evaluating the Western District's decision and its impacts on Staff's final position
4 on the Clean Charge Network.

5 Q. Is it your understanding that the Western District's decision is final?

6 A. No. Based upon advice from counsel, it is my understanding that the parties to
7 the case have 15 days to request transfer to the Missouri Supreme Court.

8 Q. What changes would Staff recommend to KCPL's and GMO's CCN tariff,
9 should the Western District's decision become final?

10 A. Staff would recommend that KCPL and GMO allocate the EV charging station
11 investment and expenses to a separate EV class in order to evaluate the appropriateness of the
12 rate charged to customers served on the CCN rate schedule.

13 Q. Did KCPL or GMO allocate any costs to the CCN tariff in order to evaluate the
14 appropriateness of the proposed rate to be charged on the CCN?

15 A. No. As discussed further in the CCoS rebuttal testimony of Staff witness Robin
16 Kliethermes.

17 Q. Does Staff have any additional recommendations?

18 A. Yes. Staff would recommend that KCPL's and GMO's CCN tariff incorporate
19 time of use rates ("ToU") to promote charging during off-peak hours or to provide a more
20 accurate price signal if the customer is charging during on-peak hours. Staff would
21 also recommend that KCPL and GMO evaluate the potential for additional utilization of EV's
22 such as:

² Missouri Court of Appeals Western District, Case No WD80911, Filed August 7, 2018.

- 1 • Vehicle to grid (V2G), vehicle to home (V2H), or vehicle to building
2 (V2B) programs to promote efficient and effective integration of the
3 EVs onto the grid;
- 4 • The integration of EVs with the grid incorporating smart distribution
5 planning;
- 6 • Incorporation of EV charging in Demand Response programs.

7 Q. Does this complete your rebuttal testimony?

8 A. Yes it does.

BYRON M. MURRAY CREDENTIALS

PRESENT POSITION

I am currently employed as a Regulatory Economist III in the Tariff/Rate Design Unit, Operational Analysis Department within the Commission Staff Division of the Missouri Public Service Commission. I have been employed at the Missouri Public Service Commission since October 2013.

EDUCATION

I received my Bachelor of Science in Agricultural Business from Lincoln University in Jefferson City, MO in May 1997. I completed my Master of Public Administration from the University of Missouri – Columbia in Columbia, MO in May 2004.

EMPLOYMENT BACKGROUND

Prior to joining the Commission, I worked as an Energy Planner II for the Division of Energy, Department of Economic Development. I was a Unit Chief/Fiscal and Administrative Manager, in the Water Protection Program of the Department of Natural Resources responsible for the management of fee collections. I also worked as a Management Analyst Specialist II in the Administration Division and the Solid Waste Management Program of the Department of Natural Resources. I was employed as a Planner II/State Project Manager for the Scrap Tire Unit in the Solid Waste Management Program of the Department of Natural Resources. I have approximately 28 years of professional regulatory enforcement experience with the State of Missouri.

This will be my fourth participation in a rate case before the commission. Please see the table below of case proceedings:

Case Number	Company Name	Testimony Type	Type of Case	Issue
ER-2014-0370	KCP&L	Direct/Rebuttal/Surrebuttal	Electric Rate Case	Tariff/Rate Design
ET-2016-0246	Ameren Missouri	Rebuttal	Electric Vehicle Tariff	Tariff/Rate Design for Electric Vehicle Charging Station Network
ER-2016-0179	Ameren Missouri	Rebuttal	Electric Rate Case	Tariff/Rate Design for Electric Vehicle Charging Stations
EW-2016-0123	Electric Vehicle Working Docket	Staff Report	Working Group	Tariff/Rate Design Electric Vehicle Charging Station
ER-2016-0285	KCP&L	Rebuttal	Electric Rate Case	Tariff/Rate Design Electric Charging TOU Rates for EV Charging Station Network

cont'd Byron M. Murray

Case Number	Company Name	Testimony Type	Type of Case	Issue
EW-2016-0313	A Working Case To Consider Policies To Improve Electric Utility Regulation	Staff Report	Working Group	Tariff / Rate Design to improve regulation
EW-2017-0245	A Working Case To Explore Emerging Issues in Utility Regulation: Smart Non-Residential Rate Design	Staff Report	Working Group	Electric Vehicle Infrastructure
GA-2017-0016	Summit Natural Gas of Missouri	Staff Recommendation	CCN Application	CCN Application
GA-2018-0220	Summit Natural Gas of Missouri	Staff Report and Recommendation	CCN Application	CCN Application
GR-2016-0099	The Empire Electric District – Gas	Staff Recommendation	Winter PGA	Scheduled Winter PGA ACA