

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

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

In the Matter of the Application of Evergy)
Missouri West, Inc. d/b/a Evergy Missouri) File No. ET-2021-0269
West for Approval of a Transportation)
Electrification Portfolio)

RENEW MISSOURI'S INITIAL BRIEF

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COMES NOW, Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”),
and for its *Initial Brief* states:

Introduction

1. Evergy’s proposal for an expanded transportation electrification portfolio is driven by the need to prepare for a fast-approaching future when the electric grid must be able to accommodate and incorporate far more electric vehicles (“EV”). The global EV adoption forecast is a compound annual growth rate of 29 percent that is expected to be achieved over the next ten years.¹ In Kansas City, one of Evergy’s largest energy customers, Ford Motor Company, has stated it expects between 40 and 50 percent of its sales to be EVs by 2030, with its total investment in EVs to top \$30 billion through 2025.² General Motors announced earlier this year that it had the aspirational goal of exclusively selling vehicles that operated on an electric platform by 2035. In the next decade, EVs will continue to increase in adoption and – along with that adoption, the energy they require will present challenges to the electric grid.

¹ Ex. 3, p. 3.

² Id.

2. Evergy must act now – before widespread EV adoption – to study and adopt pilot programs that will prepare the company to meet the on-going energy needs of customers as well as meet increased energy needs from EV customers whether they charge at home or in public spaces. The company has proposed programs in this case to help it prepare including expanding the Clean Charge Network, implementing a Streetlight Corridor program, and offering Residential, Developer, and Commercial Rebates related to EV charging. While the impacts of these pilot programs may be minimal initially, the information and strategies learned will be essential to efforts to manage EV adoption and ensure these efforts towards electrification are fueled by an increasing amount of wind and solar generation. For these reasons, Renew Missouri urges the Commission to approve Evergy’s proposed programs.

The Commission Should approve Evergy’s Residential Customer EV Outlet Rebate Program

3. With modifications to encourage efficient charging including education to encourage customers to charge their EVs in off-peak time periods this program should be approved. The Residential Rebate Program is a pilot that incentivizes existing EV owners to transition from Level 1 charging (120V) to Level 2 charging (240V) in their homes.³ By encouraging the adoption of faster charging customers can shorten the time it takes to charge their EVs and have a greater ability to fully charge their vehicles in off-peak hours only whereas a level 1 charger takes longer and may require customers to charge during off- and on-peak hours.⁴ Additional education about the benefits of charging off-peak or enrolling in a time-of-use rate should be required. Ultimately, the lessons learned from customers charging habits and behaviors that take part in the rebate pilot will help prepare Evergy for an increasingly electrified future where Level 2 home charging is common. This program is in the public interest and should be approved.

³ Ex. 7, p. 11.

⁴ Id.

The Commission Should approve Evergy’s Residential Developer EV Outlet Rebate Program

4. In the absence of building codes requiring this improvement, Evergy should be taking steps to work with and encourage developers to prepare homes for a future where EV charging at home is commonplace. This proposal is a step in the right direction. Evergy’s proposal would incentivize developers to pre-wire new homes with adequate circuit capacity to accommodate Level 2 EV charging by future residents.⁵ Evergy’s five-year proposal includes \$87,500 for 350 rebates (\$250 per) split roughly 65%/35% between Missouri Metro/West.⁶ In the absence of other mechanisms such as building codes that require EV- ready residential construction, the Residential Developer EV Outlet Rebate provides Evergy with an opportunity to partner with developers to prepare residential homes for expected growth in demand for EVs. Encouraging this development at the time of construction rather than after-the-fact is efficient and, when paired with customer education and outreach activities, will encourage developers to make these accommodations the new “standard” for home construction regardless of building code changes. The Residential Developer EV Outlet Rebate program is in the public interest and should be approved.

The Commission Should approve Evergy’s Commercial EV Charger Rebate Program

5. By offering a rebate to be spent on make-ready infrastructure and investment costs, Evergy can reduce the costs associated with EV charging installations at a variety of locations (highway, public, workplace, fleet, and multi-family).⁷ When a customer participates, they should be required to provide charger-level data to Evergy as a condition of receiving the rebate so that the company can process and learn from that information. This program will allow Evergy to better understand

⁵ Ex. 7, p. 20.

⁶ Id at 21.

⁷ Ex. 7, p. 21.

where EV charging is occurring on its system, which will enable further load analysis and customer targeting.⁸ This program is in the public interest and should be approved.

The Commission approve Evergy’s Clean Charge Network Expansion

6. Evergy should continue its efforts to provide broad customer access to EV charging throughout its service territory. For Missouri Metro, Evergy requests an increase of 100 stations above the existing offerings.⁹ Fifty of these stations are planned to be utilized by the KC Streetlight Charging Project in partnership with the Metropolitan Energy Center. Another four of these stations will support the emerging use case of transportation network company and rideshare charging. The other 46 stations provide flexibility for Evergy to build at its discretion so that it can meet unforeseen needs that arise.¹⁰ For Missouri West, Evergy requests an increase of 50 stations above the existing offerings with 24 planned to be utilized in highway corridor locations along secondary highways.¹¹ The remaining 26 stations for Missouri West are requested to provide flexibility for Evergy to install additional charging stations in that service area.

7. Although Evergy has one of the most extensive charging networks in the country, there are opportunities to continue expanding into underserved communities and highway corridors. By investing directly in these less prominent areas, while letting third-parties develop in more traveled areas, Evergy is appropriately expanding its system to serve all customers and building for the future. This request is in the public interest and should be approved.

Conclusion

8. Evergy has an obligation to provide electric service to its customers. In the coming years, the number of EVs charging at homes, businesses, and highways in Evergy’s service area will

⁸ Id at 22.
⁹ Ex. 7, p. 4.
¹⁰ Id.
¹¹ Id.

continue to increase. With that adoption, Evergy will face new and different challenges to its existing electric grid. The time to pursue these pilots to study how this change will impact its operations and prepare its system to incorporate this new load growth without causing issues for customers is now. Evergy’s proposals look to the future and prepare for coming EV influx. The Commission should permit and encourage this proactive approach and approve these programs.

WHEREFORE, Renew Missouri respectfully submits its *Initial Brief*.

Respectfully,

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Certificate of Service

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 19th day of November 2021:

/s/ Tim Opitz
