

Exhibit No.:
Issue: EV Charging Station Tariff
Witness: Tim M. Rush
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Kansas City Power & Light Company
and KCP&L Greater Missouri
Operations Company
Case No.: ET-2016-0246
Date Testimony Prepared: November 29, 2016

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ET-2016-0246

REBUTTAL TESTIMONY

OF

TIM M. RUSH

ON BEHALF OF

**KANSAS CITY POWER & LIGHT COMPANY AND
KCP&L GREATER MISSOURI OPERATIONS COMPANY**

**Kansas City, Missouri
November 2016**

REBUTTAL TESTIMONY

OF

TIM M. RUSH

Case No. ET-2016-0246

1 **Q: Please state your name and business address.**

2 A: My name is Tim M. Rush. My business address is 1200 Main Street, Kansas City,
3 Missouri 64105.

4 **Q: By whom and in what capacity are you employed?**

5 A: I am employed by Kansas City Power & Light Company (“KCP&L” or “Company”) as
6 Director, Regulatory Affairs.

7 **Q: On whose behalf are you testifying?**

8 A: I am testifying on behalf of KCP&L and KCP&L Greater Missouri Operations Company
9 (“GMO”). I will refer to both companies as KCP&L or Company.

10 **Q: What are your responsibilities?**

11 A: My general responsibilities include overseeing the preparation of the Company’s rate
12 case, class cost of service and rate design. I am also responsible for overseeing the
13 regulatory reporting and general activities as they relate to the Missouri Public Service
14 Commission (“MPSC” or “Commission”).

15 **Q: Please describe your education, experience and employment history.**

16 A: I received a Master of Business Administration degree from Northwest Missouri State
17 University in Maryville, Missouri. I did my undergraduate study at both the University
18 of Kansas in Lawrence and the University of Missouri in Columbia. I received a

1 Bachelor of Science degree in Business Administration with a concentration in
2 Accounting from the University of Missouri in Columbia.

3 **Q: Please provide your work experience.**

4 A: I was hired by KCP&L in 2001 as the Director, Regulatory Affairs. Prior to my
5 employment with KCP&L, I was employed by St. Joseph Light & Power Company
6 (“Light & Power”) for over 24 years. At Light & Power, I was Manager of Customer
7 Operations from 1996 to 2001, where I had responsibility for the regulatory area, as well
8 as marketing, energy consultant and customer services area. Customer services included
9 the call center and collections areas. Prior to that, I held various positions in the Rates
10 and Market Research Department from 1977 until 1996. I was the Manager of that
11 department for 15 years.

12 **Q: Have you previously testified in a proceeding before the MPSC?**

13 A: I have testified on many occasions before the MPSC on a variety of issues affecting
14 regulated public utilities.

15 **Q: What is the purpose of your testimony?**

16 A: The purpose of my testimony is to support the tariff filing made by Ameren in this case
17 and provide some perspective of what KCP&L has done in its efforts to support the
18 electric vehicle market.

19 **Q: Does the Company agree with Ameren that the Commission has a role in the
20 regulation of electricity from a charging station to an electric vehicle?**

21 A: Yes. The Company believes that the Commission has jurisdiction over Electric Vehicle
22 Charging Stations (“EVCS”) provided by Missouri electric utilities and third-party
23 providers. This position is consistent with MPSC Staff’s report recommendation that

1 “EV charging stations and their operation are generally within the jurisdiction of the
2 Commission”¹. The Company provided a thorough analysis of the Missouri Public
3 Service Commission’s (“Commission”) jurisdiction over EVCS and any tariffs that
4 would govern the distribution of electricity through EVCS. This is contained in the
5 Company’s responses in the Commission workshops in Case No. EW-2016-0123².

6 **Q: Does the Company feel that Missouri electric utilities are best situated to develop
7 and deploy an extensive EV charging network?**

8 A: Yes. As described in National Resource Defense Council’s recommendation³ “achieving
9 significant PEV [Plug-in Electric Vehicles] penetration levels requires the development
10 of an extensive, well-planned charging station network that provides value to drivers. For
11 several reasons, electric utilities are uniquely positioned to accelerate the vehicle
12 electrification process...”. The Company believes that the electric utilities in Missouri
13 have the experience and resources to effectively implement state-wide vehicle
14 electrification. Additional collaborative efforts are currently underway with the Missouri
15 Department of Transportation, Department of Energy, Clean Cities Coalitions, and
16 additional interested stakeholders to monitor and implement stations as users continue to
17 adopt electric vehicles.

¹ *In the Matter of a Working Case Regarding Electric Vehicle Charging Facilities*, Missouri Public Service Commission Corrected Staff Report. Case No. EW-2016-0123, EFIS Item No. 134.

² *In the Matter of a Working Case Regarding Electric Vehicle Charging Facilities*, Response of Kansas City Power & Light and KCP&L Greater Missouri Operations Company to Commission Questions. Case No. EW-2016-0123, EFIS Item No. 13.

³ *In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of a Tariff Setting a Rate for Electric Vehicle Charging Stations*, Recommendation of Natural Resources Defense Council, File No. ET-2016-0246, EFIS Item No. 45.

1 **Q. Is a Missouri electric utility obligated to provide electricity to EV drivers from**
2 **publically accessible charging stations?**

3 A: Yes. All Missouri electric utilities have an obligation to serve in their certificated service
4 territory in accordance with Commission-approved terms and conditions, rules and
5 regulations. Part and parcel of a utility's obligation to serve is the responsibility to
6 provide facilities that are safe and adequate. Section 393.130.1 RSMo. The adequacy of
7 facilities provided by any utility is a question of fact, and it is reasonable to expect that
8 standards regarding what constitutes "adequate" facilities may change over time.

9 **Q: Does the Company believe that the electric vehicle charging market should evolve to**
10 **third-party providers?**

11 A: Yes, the Company believes that at the right time and under the right conditions, entities
12 other than Missouri electric utilities should be permitted to provide and charge for EVCS
13 in the service territory of Commission-regulated electric utilities.

14 **Q: Does the Company agree with Ameren's witness Mark Nealon that benefits will be**
15 **provided to all electric utility customers throughout Missouri?**

16 A: All of Missouri electric utility customers, both EV users and non-EV users alike, will
17 benefit from the installation of EV charging stations. Benefits include environmental
18 benefits from reduced CO₂ emissions and lower ozone-reducing pollutants, economic
19 impacts resulting in job creation, and lower costs and greater efficiency by having the
20 utility install, own and operate the EV charging stations. The increase in home-based
21 usage to charge EVs will also provide a broader base over which to spread system costs.

1 **Q: Ameren witness Mark Nealon references that KCP&L and GMO have installed**
2 **electric vehicle charging stations. Please provide a description of the Clean Charge**
3 **Network.**

4 A: The Clean Charge Network (“CCN”) is an initiative to install and operate more than
5 1,000 EVCS throughout the Greater Kansas City region within the KCP&L (both
6 Missouri and Kansas) and GMO service territories.

7 **Q: Does the KCP&L or GMO currently have an approved tariff in Missouri for its**
8 **operation of the CCN?**

9 A: No. KCP&L Missouri has filed an EV tariff in Case No. ER-2016-0285. The tariff would
10 establish a rate for Level 2 and Level 3 charging stations. Level 3 charging stations are
11 also known as a DC Fast Charger. The proposed tariff also includes guidelines for
12 application of Session Charges, at the discretion of the host, to incent charging station
13 users to move their vehicles promptly after charging to improve utilization of the stations.
14 The Kansas Corporation Commission recently approved a tariff for KCP&L Kansas
15 customers effective in 2017⁴.

16 **Q: Is KCP&L/GMO familiar with the Missouri Department of Transportation**
17 **(“MODOT”) ‘Road to Tomorrow initiative?**

18 A: Yes. The Company has committed to participate and collaborate with MODOT and other
19 Missouri electric utilities to add several fast charging stations in combination with Level
20 2 charging along the I-70 corridor. EV charging islands will be conveniently located right
21 off the highway in communities across the state. Location planning is currently
22 underway.

⁴ *Application of Kansas City Power & Light Company for Approval of its Clean Charge Network Project and Electric Vehicle Charging Station Tariff*, File No. 16-KCPE-160-MIS.

1 Q: Does this conclude your rebuttal testimony?

2 A: Yes.

