

Exhibit No.:
Issue: EV Charging Station Tariff
Witness: Tim M. Rush
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Kansas City Power & Light Company
and KCP&L Greater Missouri
Operations Company
Case No.: ET-2016-0246
Date Testimony Prepared: December 19, 2016

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ET-2016-0246

SURREBUTTAL TESTIMONY

OF

TIM M. RUSH

ON BEHALF OF

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

**Kansas City, Missouri
December 2016**

SURREBUTTAL 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: Are you the same Tim M. Rush who provided rebuttal testimony in this docket?**

11 A: Yes.

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

13 A: The purpose of my surrebuttal testimony is to address certain positions and
14 recommendations presented in rebuttal testimony by Staff witnesses Natelle Dietrich and
15 Byron Murray and OPC witness Geoffrey Marke, as well as address positions taken by
16 ChargePoint witness Anne Smarton regarding the quantification of charging stations in
17 the state of Missouri and the recommendation for a new docket.

1 **Q: Please explain your understanding of Staff's position.**

2 A: Staff believes that the Commission has jurisdiction over EV charging stations but asserts
3 that the Commission should not approve Ameren's EV tariffs unless all revenues,
4 expenses and investment are recorded below the line to hold ratepayers harmless. While
5 the Company agrees that the Commission has jurisdiction over EV charging stations, it
6 does not understand Staff's position that this regulated service should be treated below
7 the line. If the service is regulated, it should be treated above the line, unless the
8 Commission determines that the investment is imprudent.

9 **Q: ChargePoint contends that there are 1,025 public charging ports in Missouri, thus**
10 **demonstrating the market is providing adequate support for EV adoption.¹ Does**
11 **the Company agree with this?**

12 A: Not necessarily. If one were to filter out utility, Tesla and auto dealership-owned
13 locations, I estimate that there are less than 100 charge ports located at approximately 50
14 host locations in Missouri. The majority of the stations are owned by KCP&L and GMO
15 in their respective service territories. KCP&L and GMO are seeking to jumpstart the
16 marketplace and allow for drivers to seriously consider the purchase of an EV. Without
17 utility involvement, the number of available charging stations would be exponentially
18 smaller and the needs and concerns of drivers would not be addressed. I do agree with
19 ChargePoint that additional charging stations are needed throughout the state.

20 **Q: Do you agree with ChargePoint's request of the Commission to initiate a docket to**
21 **discuss policy issues related to charging a kWh fee?**

22 A: No. The Commission's investigatory docket, EW-2016-0123, covered this area in detail.

¹ See Rebuttal Testimony of Anne Smart, pg. 6.

1 **Q: What is your opinion of OPC witness Marke's position that EV drivers and**
2 **ratepayers are best served by a competitive market?**

3 A: The Company believes that in the future, private entities may become key players in the
4 charging station market. But that is not the case today. As I understand the current law
5 in Missouri,² public utilities are the only entities currently authorized to offer public
6 charging stations such as those proposed in this docket. Customers are utilizing the EV
7 charging stations installed as part of KCP&L's Clean Charge Network. Since a utility is
8 the only legal entity in the state authorized to offer the service, the Commission should
9 not deny customers access to the service or deny a utilities' ability to recover the costs of
10 the EV charging stations.

11 I believe that the Commission should approve Ameren's and KCP&L's EV tariffs
12 and allow recovery of EV charging station costs because:

- 13 (1) utilities are the only entity legally authorized to provide public EV
14 charging stations in Missouri;
- 15 (2) there is a demand for the charging stations;
- 16 (3) program costs and impacts to customers are small in relation to ongoing
17 utility operating costs;
- 18 (4) the data collected from the program will be instrumental in crafting
19 appropriate regulatory and legislative changes to allow non-utilities to
20 participate in the market, and

² My understanding is based on the Company's filings in EW-2016-0123. Staff's analysis in its legal brief is consistent on this point.

1 (5) securing legislative changes to allow non-utilities to provide the service
2 will take significant time, in the meantime EV drivers need to be provided
3 safe and adequate service

4 (6) The economic development and other benefits flowing from EV charging
5 stations offer value to customers, Missouri utilities, the Commission and
6 the State of Missouri.

7 **Q: Does this conclude your rebuttal testimony?**

8 A: Yes.

