

**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 )

**POSITION STATEMENTS**  
**OF RENEW MISSOURI**

COMES NOW, Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”),  
and for its Position Statements states:

Issues:

1. *Should the Commission approve Evergy’s proposed Residential Customer EV Outlet Rebate Program?*

Yes, with modifications to encourage efficient charging.

a. *If the Commission approves Evergy’s proposed Residential Customer EV Outlet Rebate Program, should the Commission require that participants also sign up for the Company’s existing whole house, opt-in TOU rate?*

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

b. *If the Commission approves Evergy’s proposed Residential Customer EV Outlet Rebate Program, should the Commission modify the program consistent with ChargePoint’s recommendations?*

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

2. *Should the Commission approve Evergy's proposed Residential Developer EV Outlet Rebate Program?*

Yes.

3. *Should the Commission approve Evergy's proposed Commercial EV Charger Rebate Program?*

Yes.

a. *If the Commission approves Evergy's proposed Commercial EV Charger Rebate Program, should the Commission modify the program consistent with ChargePoint's recommendations?*

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

b. *If the Commission approves Evergy's proposed Commercial EV Charger Rebate Program, should the Commission require that 20 percent of Commercial Rebates be reserved for multi-family locations?*

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

c. *If the Commission approves Evergy's proposed Commercial EV Charger Rebate Program, should the Commission order rebate incentive amounts be capped on a percentage basis to not exceed 20% of the total costs for a charger station?*

No.

4. *Should the Commission approve Evergy's proposed Electric Transit Service Rate?*

Yes.

a. *Is it lawful for the Commission to approve a rate for this new service outside of a general rate case?*

Yes.

b. *Is it lawful for the Commission to approve a rate for this new rate at this time given the Company has elected PISA?*

Yes.

c. *If the Commission does approve the new rate, should the Company use the revenue received from the rate schedule to offset the costs Evergy is requesting to defer to a regulatory asset account?*

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

5. *Should the Commission approve Evergy's proposed Business EV Charging Service Rate?*

Yes.

a. *Is it lawful for the Commission to approve a rate for this new service outside of a general rate case?*

Yes.

b. *Is it lawful for the Commission to approve a rate for this new rate at this time given the Company has elected PISA?*

Yes.

c. *If the Commission does approve the new rate, should the Company use the revenue received from the rate schedule to offset the costs Evergy is requesting to defer to a regulatory asset account?*

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

6. *Should the Commission approve Evergy's proposed Clean Charge Network Expansion?*

Yes.

a. *Should the Commission approve Evergy's request to expand its CCN along the highway corridors?*

Yes.

b. *Should the Commission approve Evergy's request to partner with the Metropolitan Energy Center and the City of Kansas City, Missouri to pilot streetlight charging installations in the city's right of way?*

Yes.

c. *Should the Commission approve Evergy's request to utilize some of the charging stations under the cap towards use by transportation network companies ("TNCs")/rideshare companies?*

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

d. *Should the Commission approve Evergy's request that the Commission find that the limited and targeted CCN expansion plans Evergy has proposed in this filing are prudent from a decisional perspective?*

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

e. *Should the Commission direct Evergy to allow site hosts at new CCN sites to choose the EV charging hardware and network service provider and to set the prices paid by drivers?*

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

7. *Should the Commission approve Evergy's proposed Customer Education and Program Administration proposal?*

Yes.

8. *Should the Commission approve Evergy's proposal to administer the new pilot rebate programs over a five-year period, beginning in the first quarter of 2022 and concluding in the first quarter of 2027, including periodic reporting to the Commission and stakeholders?*

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

9. *Should the Commission approve Evergy's request that the Commission authorize the Company to use a regulatory asset tracking mechanism to track and defer the pilot program costs which include rebate incentives and certain associated customer education and administrative costs?*

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

10. *Should the Commission approve Evergy's requests for a variance of subsections 4 CSR 240-14.020(1)(B), (1)(D), and (1)(E) only as those subsections are applied to the pilot programs as described in any approved compliance tariffs resulting from this case?*

Yes.

WHEREFORE, Renew Missouri respectfully submits its Positions Statements.

Respectfully,

**/s/ Tim Opitz**

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Certificate of Service

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 27<sup>th</sup> day of September 2021:

**/s/ Tim Opitz**

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