

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light)
Company's Request for Authority to) **File No. ER-2016-0285**
Implement a General Rate Increase for)
Electric Service)

NRDC'S STATEMENT OF POSITIONS

Natural Resources Defense Council takes positions solely on the Clean Charge Network (Issue XXII, as well as those closely related Commission Raised Issues I(B) and I(C)).

Issue XXII.A (Clean Charge Network) – Is the Clean Charge Network a regulated public utility service?

Yes. It is within the Commission has jurisdiction as a provision of electric service to the public by an electrical corporation, although this should not be to the exclusion of a competitive market supplied by third parties.

Issue XXII.B (Clean Charge Network) – B. Should capital and O&M expenses associated with the Clean Charge Network be recovered from ratepayers?

Yes. The Company should be entitled to recover the prudently incurred capital and O&M expenses associated with its regulated public utility services. This service has an important role to play in enabling the diffusion of EVs. Vehicle electrification will benefit all customers in ways that include system flexibility and reliability, downward pressure on electric rates for all utility customers through the increased utilization of fixed-cost assets, greater integration of renewable generation, the elimination of tailpipe

pollution and reduction of greenhouse gas pollution, reduced oil dependence and greater energy security. It will also increase EV adoption beyond the present class of mostly affluent early adopters by aiding the production of cheaper, more technologically advanced vehicles and batteries.

Issue XXII.C (Clean Charge Network) / Issue I.C (Commission Raised Issues) – Should KCP&L develop a PEV-TOU rate to be considered in its next general rate case?

Yes. The Company should be required to develop time-of-use energy charges in order to better integrate electric vehicle charging with the electric power system, consistent with the Commission Staff's Final Report in EW-2016-0123. Such rates are necessary, particularly for home charging, to avoid increased evening peak demands. In time, with wider EV adoption, TOU rates will be necessary to ensure reliability.

Issue XXII.D (Clean Charge Network) – Should the session charge be removed from the tariff?

Yes. The session charge is a poor price signal that does not reflect cost causation and would result in unfair treatment of those EV drivers who must rely on the slower L2 chargers.

Respectfully submitted,

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Dated: February 3, 2017.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and electronically mailed to all counsel of record on this 3rd day of February, 2017.

/s/ Henry B. Robertson
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