



Legal Department

Roger W. Steiner
Corporate Counsel
Telephone: (816) 556-2314
Facsimile: (816) 556-2110
Roger.Steiner@evergy.com

May 7, 2021

Missouri Public Service Commission
200 Madison Street
Jefferson City, MO 65101

Re: In the Matter of the Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro for Approval of a Transportation Electrification Portfolio.
Case No. ET-2021-0151 (consolidated; lead case)

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

To Whom It May Concern:

Evergy Metro, Inc. d/b/a as Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”)(collectively, “Evergy” or the “Company”) are submitting an updated testimony report and appendices to correct an error in the cost effectiveness evaluation calculations and to modify how the model calculates costs and benefits associated with near-term non-residential Level 2 charging needs. These changes result in an increase to the estimated customer benefits associated with Electric Vehicle (“EV”) adoption in the Company’s service territory. Specifically, the estimated Net Present Value (“NPV”) in Evergy Missouri Metro customer benefit through 2040 is \$42.5 million and the estimated benefit to Evergy Missouri West customers through 2040 is \$22.6 million.

Specific portions of the testimony report and Appendix C have been changed since the original submission, indicated with redlines on the following pages:

- Testimony report – overview graphic, page 4, page 7, page 19, and page 20
- Appendix C, Evergy Missouri Metro Cost Effectiveness Evaluation report – page 1, page 6, and pages 9-12
- Appendix C, Evergy Missouri West Cost Effectiveness Evaluation report – page 1, page 6, and pages 9-12

For convenience, the Company is providing both a redlined version and a clean copy of the updated testimony report.

After the Company's initial filing on February 24, 2021, a formula error was discovered in ICF International, Inc.'s ("ICF") cost effectiveness model that resulted in a lower weighted average electricity cost. As explained on page 6 of the cost effectiveness reports provided in Appendix C, ICF's modeling uses a weighted mix of residential and commercial rates to reflect the distribution of a typical EV's charging load profile. This estimated cost results from a combination of charging load profiles and current electricity rates. The formula originally used was incorrectly pulling from the coincident kW value rather than the estimated percent of workplace and public charging use. ICF has corrected the formula error and, as a result, the weighted average electricity rate has increased by \$0.02 per kWh in both Missouri jurisdictions.

Additionally, it was discovered that the cost effectiveness model was inaccurately treating "negative" infrastructure costs resulting from existing non-residential Level 2 EV charging infrastructure in the Company's territory as a benefit. This occurred for scenarios in which the projected infrastructure need in a given year was less than the estimated existing infrastructure. To address this discrepancy, ICF adjusted the model to only incorporate infrastructure costs when the projected infrastructure need is greater than the estimated existing infrastructure.

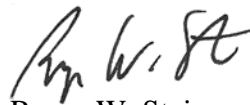
These revisions have multiple impacts on the cost effectiveness evaluation results. The increase in total retail electricity costs to charge EVs means greater costs for EV drivers (i.e., participants) but also greater benefit to all utility customers. Regarding charging infrastructure costs, as noted in the reports provided in Appendix C, the analysis employs the conservative assumption that all the Company's customers bear commercial charging infrastructure costs required to support the projected level of EV adoption. Therefore, the change to near-term infrastructure cost treatment reduces the benefit to customers as well as society.

A summary of the overall impacts of the described changes are as follows:

- The estimated customer benefits increase compared to the original submission;
- The estimated participant (i.e., EV driver) benefits decrease compared to the original submission; and
- The estimated societal benefits decrease slightly compared to the original submission.

If you have any questions or concerns, please do not hesitate to contact me.

Respectfully submitted,



Roger W. Steiner

cc: EO-2021-0151 and EO-2021-0269 Service Lists