

**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 Approval of a Transportation
Electrification Portfolio

Case No. ET-2021-0151

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

**POSITION STATEMENT OF
CHARGEPOINT, INC.**

ChargePoint, Inc. (ChargePoint) respectfully submits this Position Statement pursuant to the Commission's May 26, 2021 Order Setting Procedural Schedule and Suspending Tariffs.

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

Yes, provided the Commission modifies the program consistent with ChargePoint's recommendations, listed below.

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?

ChargePoint recommends that the Commission direct Evergy to provide information to participants in the Residential Rebate program that encourages them to sign up for the applicable residential time-of-use rate and educates them on the benefits of doing so. To the extent the Commission remains concerned that Residential Rebate program participants will charge during

on-peak hours, the Commission should consider directing Evergy to enroll customers in the applicable residential time-of-use rate with the ability for customers to opt-out as needed. The Commission can also consider directing Evergy to develop a managed charging program for the Commission's consideration in the future.

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?

Yes. The Commission should modify the Residential Rebate program as follows:

- Direct Evergy to provide all qualifying customers with a \$500 rebate per home;
- Direct Evergy to allow residential customers that participate in the Residential Rebate program to hardwire their home chargers and not to require the installation of NEMA outlets (but allow customers to install NEMA outlets if they prefer);
- Direct Evergy to develop a list of qualifying chargers for the Residential Rebate program, which should be updated upon request by vendors that introduce new qualifying products. To qualify for the Residential Rebate program, the Commission should require that chargers be ENERGY STAR certified, have a safety certification from UL or another Nationally Recognized Testing Laboratory, and have managed charging capabilities.

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, provided the Commission modifies the program consistent with ChargePoint's recommendations, listed below.

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

Yes. The Commission should modify the Commercial Rebate program as follows:

- Direct Evergy to remove the requirement that site hosts that participate in the Commercial Rebate program share charger utilization data with Evergy;
- Direct Evergy to remove the requirement that customers agree to participate in demand response events.

- 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?**

ChargePoint takes no position on this issue.

- 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?**

ChargePoint takes no position on this issue.

- 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?**

ChargePoint takes no position on this issue.

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?**

ChargePoint takes no position on this issue.

6. Should the Commission approve Evergy’s proposed cap increase for the Clean Charge Network Expansion?

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

ChargePoint takes no position on this issue.

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?

ChargePoint takes no position on this issue.

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?

ChargePoint takes no position on this issue.

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?

Yes.

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?

Yes.

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?

Yes.

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?

Yes.

a. Should the Commission approve the requested 5-year amortization timeframe requested as part of this case?

Yes.

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?

ChargePoint takes no position on this issue.

Respectfully submitted on September 27, 2021,

/s/ Scott Dunbar

Scott Dunbar

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record on September 27, 2021:

/s/ Alicia Zaloga