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Case No.: ET-2021-0151; ET-2021-0269
Date Testimony Prepared August 16, 2021

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

REBUTTAL TESTIMONY OF JUSTIN D. WILSON
ON BEHALF OF CHARGEPOINT, INC.

August 16, 2021

I. Introduction and Summary of Recommendations.

Q: Please state your name.

A: My name is Justin Wilson.

Q: By whom are you employed and in what position?

A: I am a Director of Public Policy at ChargePoint, Inc (ChargePoint).

Q: Please describe your current role and your relevant professional experience.

A: In my current role, I direct ChargePoint's regulatory efforts in twenty-two states, including Missouri. I engage on behalf of ChargePoint at utility regulatory commissions, state legislatures, and other state agencies to promote public policies that expand electric vehicle infrastructure and advance best practices within the electric vehicle charging industry.

My relevant professional experience appears in my CV, which is attached as Attachment JDW-1.

Q: Please describe ChargePoint.

A: ChargePoint is a world leading electric vehicle (EV) charging network, providing scalable solutions for every charging scenario from home and multifamily to workplace, parking, hospitality, retail, and transport fleets of all types. ChargePoint's cloud subscription platform and software-defined charging hardware is designed to enable businesses to support drivers, add the latest software features and expand fleet needs with minimal disruption to overall business.

ChargePoint's hardware offerings include Level 2 (L2) and DC fast charging (DCFC) products, and ChargePoint provides a range of options across those charging levels for specific use cases including light duty, medium duty, and transit fleets, multi-unit

dwellings, residential (multi-family and single family), destination, workplace, and more. ChargePoint's software and cloud services enable EV charging station site hosts to manage charging onsite with features like Waitlist, access control, charging analytics, and real-time availability. With modular design to help minimize downtime and make maintenance and repair more seamless, all products are also UL-listed and CE (EU) certified, and Level 2 solutions are ENERGY STAR® certified.

ChargePoint's primary business model consists of selling smart charging solutions directly to businesses and organizations while offering tools that empower station owners to deploy EV charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven, cloud-enabled capabilities that enable site hosts to better manage their charging assets and optimize services. For example, with those network capabilities, site hosts can view data on charging station utilization, frequency and duration of charging sessions, set access controls to the stations, and set pricing for charging services. These features are designed to maximize utilization and align the EV driver experience with the specific use case associated with the specific site host. Additionally, ChargePoint has designed its network to allow other parties, such as electric utilities, the ability to access charging data and conduct load management to enable efficient EV load integration onto the electric grid.

Q: What is the purpose of your Rebuttal Testimony?

A: The purpose of my Testimony is to explain ChargePoint's position on Evergy's proposed Transportation Electrification Portfolio. ChargePoint largely supports Evergy's proposals but recommends several key improvements to the rebate programs and the proposed Clean

Charge Network (CCN) expansion that will ensure the programs are effective, encourage participation, and support the competitive market.

Q: Please summarize your recommendations to the Commission.

A: I recommend that the Commission:

- Approve the Residential Rebate program with the following modifications:
  - 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.
- Approve the Developer Rebate program as proposed.
- Approve the Commercial Rebate program with the following modifications:
  - 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.

- Approve Evergy's proposal to expand the CCN but 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;
- Approve the Electric Transit Service rate and Business EV Charging Service rate as proposed.

II. Evergy's Proposed Rebate Programs.

Q: What will you address in this section of your testimony?

A: In this section of my testimony, I will explain ChargePoint's reasons for largely supporting Evergy's proposed rebate programs: the Residential Customer EV Outlet Rebate (Residential Rebate), the Residential Developer EV Outlet Rebate (Developer Rebate), and the Commercial EV Charger Rebate (Commercial Rebate). I also recommend several modifications to these programs that will improve their effectiveness.

Q: Generally speaking, does ChargePoint believe it is appropriate for Evergy to provide rebates to cover the cost of installing an EV charging stations behind a customer's meter?

A: Yes. I recognize that behind-the-meter assets have traditionally been the responsibility of customers and that utilities typically do not own or pay for facilities on the customer side of the meter. However, as far as I am aware, treating the customer meter as the point of demarcation of responsibility is a result of tradition and not of any particular law.

Q: How did ChargePoint evaluate Evergy's proposed transportation electrification programs?

A: As a provider of electric vehicle charging hardware and software services with numerous potential and existing customers in Evergy's territory, ChargePoint takes great care to evaluate transportation electrification programs for their impact on the competitive market for charging hardware and software services. In particular, ChargePoint advocates for utility program designs that promote innovation, competition, and customer choice because these are some of the most important benefits that a competitive market provides to both EV drivers and EV charging station site hosts. (I use the term "site host" to refer to the owner or lessor of the property on which an EV charging station is located. Site hosts include residential customers; owners of multi-family housing (MFH); commercial customers that offer charging to the public, their customers, and/or their employees; fleet owners; and government entities.)

In the competitive marketplace for EV charging services, site hosts select the technologies they prefer in an open market, invest their own capital, seek any incentives available through public agencies or utilities, and, in the case of commercial stations, offer competitive charging services to attract drivers and recoup necessary expenses. For their part, charging hardware, software, and service providers innovate new hardware, software, and service offerings to enable site hosts to choose the products and services that will best meet their needs. These providers compete to offer site hosts the best products to meet their needs at reasonable cost. In competitive markets, utilities can support site hosts and charging hardware, software, and service providers by developing programs that make it

less costly and easier for site hosts to install charging equipment and provide charging services. When utilities encourage competition in the market, charging providers will develop innovative hardware, software, and services solutions to provide to site hosts. Rebate programs such as Evergy has proposed support this competitive market for EV charging hardware, software, and commercial charging services by reducing the total cost of installing EV charging stations.

Q: Please describe the key components of Evergy's proposed rebate offerings.

A. For the Residential Customer EV Outlet Rebate (Residential Rebate) program, Evergy has proposed a rebate to cover 50 percent of installation costs up to $500 per customer for the installation of a dedicated 240V circuit (40A or greater, including a NEMA 14-15 outlet).[1] For the Residential Developer EV Outlet Rebate (Developer Rebate) program, Evergy has proposed to provide a rebate of $250/home to residential home developers that install a dedicated 240V circuit (40A or greater, including a NEMA 14-15 outlet) in new homes.[2] For the Commercial EV Charger Rebate (Commercial Rebate) program, Evergy proposes to provide site hosts with rebates of $2,500 per port for Level 2 and $20,000 per unit for DCFCs to cover both customer-side infrastructure (also known as make-ready infrastructure) and EV charger equipment costs, up to a specified maximum rebate amount per site depending on the type of site.[3] For the Commercial Rebate program, Evergy plans to develop a list of qualified Level 2 and DCFC chargers that meet certain technical specifications, including that chargers be network-capable, ENERGY STAR certified for

[1] Evergy Transportation Electrification Portfolio Filing Report, updated 5-7-2021 (TEP), p. 24 and Appendix A.
[2] TEP, p. 24 and Appendix A.
[3] TEP, p. 25 and Appendix A.

Level 2, safety certified, and managed charging capable.[4] Evergy also proposes to require site hosts to provide Evergy with access to utilization data, install chargers in dedicated EV charging spaces, and agree to participate in potential future demand response (DR) events.[5]

Q: Does ChargePoint support Evergy's Residential Rebate proposal?

A: ChargePoint conditionally supports the Residential Rebate proposal if the Commission adopts the program modifications I recommend below. At a high level, the rebates will reduce customers' total cost of installing EV chargers at their homes and the utility will be able to generate additional kWh sales by increasing charging station deployment and encouraging EV adoption. Evergy's proposed program design will allow customers to choose the charging equipment and network services that best fit their needs at a reasonable price. In short, by promoting customer choice in charging equipment and services and reducing the cost of installing EV charging stations, Evergy's proposed rebate programs will support transportation electrification in its Missouri service territories. However, the effectiveness of the Residential Rebate program would be greatly improved if the Commission adopts three simple modifications to the program design.

Q: Please describe your recommended program modifications for the Residential Rebate.

A: First, I recommend that the Commission direct Evergy to remove its proposed cap of 50 percent of installation costs and simply provide all eligible customers with the proposed $500 rebate. Evergy should allow customers to use the $500 rebate toward both the cost of the charger and installation costs. Customers will need to pay for both installation costs

[4] *Id*.
[5] TEP, p. 26 and Appendix A.

and the cost of the EV charger itself, so they will still incur costs to install Level 2 charging at their home, even with a $500 rebate. Because customers will have "skin in the game," there is no reason to reduce a customer's rebate simply because they were lucky enough to have low installation costs at their home. It is my understanding that this approach also would not increase the budget. This approach is consistent with a program that was recently approved by the Colorado Public Utilities Commission for Xcel Energy, which will offer residential customers a flat $500 rebate when they purchase their own charger, regardless of installation costs.[6]

Second, instead of providing rebates for NEMA outlets, Evergy should provide rebates for the installation of EV charging stations. Many EV chargers designed for home use can be hardwired to a 240V circuit (and some chargers require hardwiring for charging at higher amperages).[7] Because Evergy seeks to incentivize the deployment of EV chargers and not simply outlets into which EV chargers can be plugged, there is no reason to require customers to install a NEMA outlet if a customer would prefer to hardwire their charger. Accordingly, I recommend that the Commission direct Evergy to modify the Residential Rebate program to require customers to install a qualifying Level 2 charging station, not a NEMA outlet, which will allow customers to hardwire their chargers if they so choose. I will discuss what I mean by "qualifying Level 2 charging station" next. I also note that, under my recommendation, any customer that would prefer to install a NEMA outlet and plug their charger into the NEMA outlet would be free to do so.

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[6] Colorado Public Utilities Commission Proceeding No. 20A-0204E, Decision No. C21-007, ¶¶ 193 and 195.
[7] For example, see: https://www.chargepoint.com/drivers/home/resource/.

Third, just as it has proposed to develop a list of qualifying EV chargers for the Commercial Rebate program, Evergy should develop a list of qualifying Level 2 home chargers for the Residential Rebate program, which should be periodically updated upon request from vendors that introduce new qualifying chargers to the market. The same criteria that applies to the Commercial Rebate program should apply to the Residential Rebate program; namely, chargers should be required to be ENERGY STAR certified, have a safety certification, and have managed charging capabilities. ENERGY STAR certified Level 2 chargers use 40 percent less electricity while in standby mode, ensuring that chargers use a minimal amount of electricity when they are not charging vehicles.[8] Similar to energy efficiency programs, this recommended requirement benefits the utility and non-participants by ensuring that EV chargers in standby mode operate efficiently. Requiring that EV chargers have a safety certification (ideally from UL or another Nationally Recognized Testing Laboratory) is important to ensure that all chargers supported by the Residential Rebate meet minimum technical and safety standards. Finally, chargers with managed charging capabilities (also known as "smart" chargers) provide both customers and Evergy with much more value than chargers that do not have such capabilities because they allow customers to program charging schedules to take advantage of time-varying rates and to participate in any managed charging or demand response programs that Evergy may propose in the future.

[8] https://www.energystar.gov/products/other/ev_chargers.

Q: Please summarize your recommendations with respect to the Residential Rebate program.

A: I recommend that the Commission approve the Residential Rebate program with the following modifications:

- 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.

Q: Do you support Evergy's proposed Developer Rebate program?

A: Yes. The Developer Rebate is a relatively low-cost, effective means of encouraging developers to build homes that are "EV ready" with a dedicated 240V circuit and NEMA outlet. As EV adoption grows, the Developer Rebate is a useful means of avoiding the need for electrical upgrades in the future. I note that, in this context, it is appropriate for Evergy to require the installation of a NEMA outlet and not an EV charging station (as I recommended for the Residential Rebate program) because homebuyers may not yet have

a need for a charging station. I recommend that the Commission approve the Developer Rebate program as proposed.

Q: Does ChargePoint support Evergy's Commercial Rebate proposal?

A: ChargePoint conditionally supports the Commercial Rebate proposal if the Commission adopts the program modifications and clarifications I recommend below. Similar to the Residential Rebate program, at a high level, Evergy's proposed Commercial Rebates will reduce site hosts' total cost of installing EV chargers at their place of business or multi-family building and the utility will be able to generate additional kWh sales by increasing charging station deployment and encouraging EV adoption. Evergy's proposed program design will allow customers to choose the charging equipment and network services that best fit their needs from a list of qualifying equipment at a reasonable price. In short, by promoting customer choice in charging equipment and services and reducing the cost of installing EV charging stations, Evergy's proposed Commercial Rebates will support transportation electrification in its Missouri service territories. However, I am concerned that two of Evergy's proposed program requirements will discourage participation and undermine the success of the program.

Q: What is the first program requirement that concerns you?

A: First, I am concerned that Evergy proposes to require site hosts to "provide Evergy with access to utilization data."[9] Evergy does not explain why it needs charger utilization data other than that it will allow Evergy to "better understand where EV charging is occurring

[9] TEP, p. 26.

on the system."[10] I believe requiring site hosts to provide all utilization data, without restriction, is needlessly burdensome and raises potential competitive concerns. Site hosts might incur additional network service fees to share their charging data with Evergy to meet this proposed requirement. Many site hosts consider EV charger data to be competitively sensitive and may be discouraged from participating in the program by a requirement that they share all utilization data. Such concerns are understandable given that Evergy operates its own EV charger network, the CCN, and could use utilization data from other site hosts to gain a competitive advantage for the CCN. Finally, while I understand Evergy's motivation to understand where EV charging is occurring on its system, it can do so through its own meter data. Though Evergy has not proposed to require site hosts that participate in the Commercial Rebate program to take service on one of its EV charging rates, any site host that chooses to take service on one of the EV charging rates is required to separately meter their EV charging stations. Evergy will be able to "better understand where EV charging is occurring on the system" by analyzing the meter data from customers that take service on the Electric Transit Service Rate or the Business EV Charging Service Rate. Accordingly, I recommend that the Commission direct Evergy to remove the proposed requirement that site hosts provide Evergy with access to charger utilization data.

[10] *Id.*

Q: What is the second program requirement that concerns you?

A: Second, I am concerned that Evergy proposes to require site hosts to "agree to participate in potential future demand response (DR) events, if deemed necessary, to minimize grid impacts."[11] While I support requiring chargers to have managed charging capabilities (including demand response capabilities) as a technical requirement, I oppose requiring customers to agree upfront to participate in any demand response events that might be "deemed necessary." Evergy has not provided any details regarding such potential demand response events, including the number of events that might be called per year, the duration of demand response events, whether site hosts will be required to reduce charging demand or cease charging activity altogether, whether site hosts would be compensated for reducing demand, and whether site hosts would be able to opt out of such events. Evergy has also not specified whether it would have discretion to deem demand response events as necessary, or if such events would be subject to Commission oversight. In short, because Evergy has not provided any details on these "potential future demand response events," customers would not know what they are signing up for.

While some site hosts will have relatively flexible EV charging loads that can respond to demand response events, many site hosts would not be able to participate in demand response without creating negative driver experiences. For example, a fueling center located near a highway that installs DCFCs might be unwilling to participate in a demand response program if doing so requires the fueling center to make the DCFC

[11] *Id.*

unavailable for use for the duration of each demand response event. An EV driver that arrives at the fueling center in need of a charge will be understandably frustrated if they are forced to wait until the demand response event is over before they can charge up and continue on their journey. Such a driver is likely to blame the fueling center for their inconvenience, not Evergy. For these reasons, the proposed demand response requirement is likely to persuade this hypothetical fueling center against participating in Evergy's Commercial Rebate program, with the likely result that the fueling center may not install DCFCs at all.

The ability to use EV charging stations to participate in demand response events is one of the many benefits of electrifying transportation. However, participation in demand response events should be strictly voluntary and, at the very least, site hosts must be informed about the details of demand response events (such as the number of events per year, duration of events, and participation/compliance requirements) before they agree to participate.

For these reasons, I recommend that the Commission direct Evergy to remove the proposed requirement that customers agree to participate in potential future demand response events. Instead, the Commission should encourage Evergy to propose an optional demand response program for EV chargers in the future for the Commission's consideration.

Q: Please summarize your recommendations for the Commercial Rebate program.

A: I recommend that the Commission approve the Commercial Rebate program with the following recommendations:

- 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.

III. Evergy's proposed CCN expansion.

Q: What will you discuss in this section of your testimony?

A: In this section of my testimony, I will address Evergy's proposal to expand the CCN, the network of EV chargers owned by Evergy. Evergy proposes to increase the cap on CCN sites from 400 to 500 in the Missouri Metro area and from 250 to 300 in the Missouri West area.[12] As part of this expansion, Evergy proposes to expand the CCN to provide DCFCs along highway corridors at strategic locations near highway exits, at strategic locations that will enable EV charging by transportation network company (TNC) drivers, and other underserved areas, as well as streetlight chargers in the City of Kansas City.[13]

Q: What is ChargePoint's position with respect to Evergy's proposal to expand its network of utility owned EV chargers?

A: ChargePoint believes that utilities are vital stakeholders in growing a competitive, sustainable EV charging ecosystem and is not opposed in principle to utilities owning and operating EV chargers, as long as parameters are in place to ensure that the utility's participation complements, rather than competes with, the competitive market. If utility participation in the competitive market crowds out other competitive providers, it could

[12] TEP, p. 34.
[13] TEP, pp. 35-36.

have long-term negative impacts on EV drivers and Evergy's customers in the form of fewer choices and higher prices for EV charging services. Utility participation under the right parameters, however, can support the competitive market to encourage EV charger deployment and EV adoption. Accordingly, ChargePoint is not opposed to Evergy's proposal to expand its utility-owned charging network, as long as these parameters, which I describe below, are in place.

Q: What parameters do you recommend to help ensure that Evergy's proposal to expand the CCN network supports and does not distort the competitive market for EV charging services?

A: I recommend that Evergy provide site hosts the ability to choose the EV charging equipment and network service provider that is deployed on their property from a list of vendors previously qualified by the utility. There are examples in other jurisdictions of utilities owning and operating EV charging stations in a manner that maintains site host choice and site host operation, such as the San Diego Gas & Electric Power Your Drive Program, Pacific Gas & Electric's EV Charge Network, and Southern California Edison's Charge Ready 2 programs in California.[14] Site hosts deploy EV chargers to support a wide variety of goals. The property owners who allow Evergy to install utility-owned CCN

[14] *See* Decision Regarding Underlying Vehicle Grid Integration Application and Motion to Adopt Settlement Agreement, CPUC Docket No. A.14-04-014 (January 28, 2016); Decision Directing PG&E to Establish an Electric Vehicle Infrastructure and Education Program, CPUC Docket No. 16-12-065 (Dec. 21, 2016); Decision Regarding Underlying Vehicle Grid Integration Application and Motion to Adopt Settlement Agreement, CPUC Docket No. A.14-04-014 (January 28, 2016); Decision Directing PG&E to Establish an Electric Vehicle Infrastructure and Education Program, CPUC Docket No. 16-12-065 (Dec. 21, 2016); Decision Authorizing Southern California Edison Company's Charge Ready 2 Infrastructure and Market Education Programs, CPUC Docket No. A.18-06-015 (August, 2020).

chargers on their property will likewise have different goals and reasons for doing so, and they should be allowed to choose the equipment and network service provider that they believe will best support their unique goals. Enabling site hosts to choose their preferred EV charging solution ensures that a competitive market can thrive within utility programs and sustainably continue after the conclusion of those programs.

I also recommend that Evergy allow site hosts to establish the prices and pricing policies for EV charging services provided at the utility-owned chargers. Site host control over pricing is also important to ensuring that site hosts can achieve their unique goals for hosting EV charging stations. For example, a restaurant may offer free or discounted charging for the first hour to attract customers, while a library may charge a fee for all charging sessions to ensure they recover the cost of electricity. Some site hosts might prefer a flat fee or a per-minute fee, while others may prefer a per-kWh price. Site hosts should be free to set prices and change prices as they see fit to support their goals. I also recommend that site hosts be the utility customer-of-record and be responsible for paying the regular bills associated with the electricity used for charging services through standard tariffs. This ensures the utility remains whole for any costs related to the electricity used by the charging stations while allowing the site host flexibility to price the charging services in accordance with its own goals. Further, this will encourage site hosts to maximize station utilization through signage, parking enforcement, maintenance, and pricing.

Q: What do you recommend?

A: I recommend that the Commission approve Evergy's proposal to expand the CCN network but 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.

IV. Evergy's proposed EV charging rates.

Q: What will you address in this section of your testimony?

A: In this section of my testimony, I will discuss Evergy's proposed dedicated EV charging rates, the Electric Transit Service Rate and the Business EV Charging Service Rate. Both of these rates feature significantly reduced demand charges, as well as on-peak and off-peak energy charges to encourage EV charging to occur during off-peak hours.[15] The Business EV Charging Service rate also has a "super off-peak period" with a very low rate for charging.[16]

Q: What is ChargePoint's position on Evergy's proposed EV charging rates.

A: ChargePoint supports Evergy's proposed rates. Demand charges can pose a significant challenge and expense for EV charging station site hosts, especially when utilization of the charger is low, which is often the case currently as EV adoption is still relatively low. In low utilization scenarios, a site host may experience a relatively small number of charging sessions in a month, but if several vehicles charge at the same time, the demand charge will be set for the entire month (or potentially much longer if there is a demand ratchet provision). Demand charges can also have an inordinate impact on transit agencies, which

[15] TEP, Appendix B.
[16] *Id.*

might be able to charge off-peak but nevertheless experience a high kW demand from charging multiple buses or other vehicles at the same time. While moving to time-of-use rates may not be the ideal solution to mitigate demand charges for public DCFC site hosts, which often have little control over when drivers want to charge, I support Evergy's proposed rate design.

I note that it is rather unusual to have an "on-peak" period that lasts from 6 AM to 6 PM as Evergy has proposed for the Electric Transit Service rate. However, because this rate only applies to transit agencies and because the Business EV Charging Service has a six-hour on-peak period (2 PM to 8 PM during non-holiday weekdays), as well as a super off-peak period overnight, I do not recommend any changes to the rates at this time.

Q: Do you have any other comments on the EV charging rates?

A: Yes, I appreciate that Evergy proposed that the EV charging rates be optional for customers. While I expect many EV charging station site hosts will find the rates beneficial, they may not be suited to all customers' unique needs and goals for installing chargers. Site hosts should be allowed to choose whether to take service on the applicable EV charging rate or stay on their otherwise applicable rate schedule. I also appreciate that site hosts that sign up for one of the EV charging rates can opt out and return to another applicable rate after one year. This flexibility is important as EV adoption grows because, while demand charges pose challenges at low utilization rates, they can be beneficial when utilization increases.

Q: What do you recommend?

A: I recommend that the Commission approve Evergy's Electric Transit Service rate and Business EV Charging Service rate as proposed.

V. Conclusion and Recommendations.

Q: Please summarize your recommendations for the Commission.

A: As stated at the beginning of my testimony, I recommend that the Commission:

- Approve the Residential Rebate program with the following modifications:
  - 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.
- Approve the Developer Rebate program as proposed.
- Approve the Commercial Rebate program with the following modifications:
  - 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.

- Approve Evergy's proposal to expand the CCN but 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;
- Approve the Electric Transit Service rate and Business EV Charging Service rate as proposed.

Q: Does this conclude your testimony at this time?

A: Yes.

Justin Wilson

Employment History

ChargePoint, Inc., April 2019 - Present
Director, Public Policy
Responsible for developing and executing regulatory and legislative strategies to promote electric vehicle charging solutions for businesses, utilities, and electric vehicle drivers.

Wilson Political Solutions, LLC, 2018 - 2019
Owner/Member
Provide political and policy expertise to a wide-range of clients including clean energy trade associations and non-profit advocacy organizations.

Clean Energy Collective, 2016 – 2018
Director of Policy and New Markets
Responsible for leading the Company's state-based efforts to expand community solar programs across the U.S., engage federal policy makers on tax and trade issues, and serve as a policy expert on state regulatory matters.

Western Clean Energy Campaign, 2008 - 2016
Executive Director, 2008 - 2016
Responsible for organization's success in the development and implementation of strategies to transition the electric power system in the Western US from primary reliance on fossil fuels to a system advancing renewable energy technologies.

Grassroots Campaigns, Inc., 2004 – 2008
Lead Organizer
Responsible for the implementation of statewide and regional campaigns that educated voters on policy issues and encouraged participation in congressional and presidential elections.

Education

- University of Arkansas (Fayetteville, AR), 2003, B.S. in Public Administration
- University of Colorado Denver (Denver, CO), 2016, Masters in Public Administration, Environmental Policy, Management, and Law Concentration

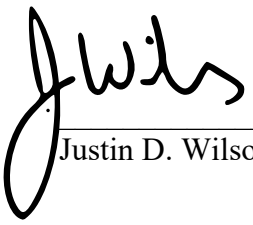
DECLARATION OF JUSTIN D. WILSON

County of Denver)
) ss
State of Colorado)

Justin D. Wilson, being duly sworn, deposes and says that the information contained in the attached Rebuttal Testimony of Justin D. Wilson on behalf of ChargePoint, Inc. was prepared by him or under his direction and direct supervision.

Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.

ChargePoint, Inc. (ChargePoint).



Justin D. Wilson