

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Evergy Metro, Inc. d/b/a
Evergy Missouri Metro's Request for
Authority to Implement a General Rate
Increase for Electric Service

Case No. ER-2022-0129

In the Matter of Evergy Missouri West, Inc.
d/b/a Evergy Missouri West's Request for
Authority to Implement a General Rate
Increase for Electric Service

Case No. ER-2022-0130

STATEMENT OF POSITION OF CHARGEPOINT, INC.

August 22, 2022

ChargePoint's Statement of Position

ChargePoint, Inc., (ChargePoint) hereby respectfully files its Statement of Position in Case Nos. ER-2022-0129 and ER-2022-0130. ChargePoint takes no position on any issue in the List of Issues not addressed in this Statement of Position.

Issue XVII.F.: Should the Company's proposed Time of Use rates schedules be implemented on an opt-in basis?

With respect to the Company's proposed Schedule RTOU-3 and Schedule RTOU-EV, ChargePoint recommends that the Commission:

- Approve Schedule RTOU-3 as proposed.
- Approve Schedule RTOU-EV with the following modifications:
 - Direct Evergy not to require a separate meter for Schedule RTOU-EV;
 - Reject Evergy's proposed monthly customer charge for this rate schedule;
 - Direct Evergy to work with qualified vendors of smart chargers with embedded metering technology to submeter customers' EV charging load for billing purposes for Schedule RTOU-EV.
- Direct Evergy to include information through its Customer Education efforts to encourage customers to ensure they have the ability to program their charging behavior – either with a smart charger or with their vehicle – before signing up for Schedule RTOU-3 or Schedule RTOU-EV.
- Approve Renew Missouri's recommendations to 1) direct Evergy to conduct a comprehensive study to determine how to integrate its time-of-use rates with customers that operate distributed generation, and 2) direct Evergy to deliver the results of the study by its next rate case or its next triennial IRP.

Issue XX.A.: Should Evergy's requested EV charging rates, Business EV Charging Service (Schedule BEVCS) and Electric Transit Service rate be promulgated? With or without modification?

The Electric Transit Service rate, Schedule ETS, was approved in Case No. ET-2021-0151 and no party proposed any modifications to Schedule ETS in this proceeding. Therefore, it is ChargePoint's position that Schedule ETS is not an issue in this proceeding and should not have been included in the List of Issues. For the avoidance of doubt, ChargePoint supports Schedule ETS as approved in Case No. ET-2021-0151 and supports its continued availability.

With respect to Schedule BEVCS, ChargePoint recommends as follows:

- Approve Schedule BEVCS as proposed.
- Reject Items 1-5 and 7 of Staff's proposed reporting requirements for Schedule BEVCS, which would require Evergy to collect data from site hosts as a condition of taking service on a cost-based rate. The Commission should only impose reporting requirements for Schedule BEVCS that Evergy can meet with its own meter data.
 - Revenue data from meters on Schedule BEVCS should be reported with a highly confidential designation and only be available to the Commission, Staff, and OPC.
- Reject Staff's recommendation for a critical peak component for Schedule BEVCS as unclear and unsupported.
- Reject Staff's recommendation to require CRP incentive recipients to take service on Schedule BEVCS.
- Reject Staff's suggestion that Schedule BEVCS is unnecessary if the Commission denies the CRP.

Issue XX.B.: Should Evergy's proposed Commercial EV Charger Rebates be approved? If yes, should there be any conditions placed on how the tariff is designed?

Yes, the Commission should approve the Commercial EV Charger Rebate Program (CRP) with the following conditions and modifications:

- Direct Evergy to require that chargers be network-capable, ENERGY STAR certified for Level 2, safety certified, and managed charging capable (Evergy has agreed to this recommendation in rebuttal).
- Direct Evergy to collect only the following data from site hosts (on a monthly basis): number of charging events, total energy (kWh) dispensed, average energy consumption (kWh) per charging event, and average duration of charging events.
- Direct Evergy not to impose any demand response requirements on DCFCs supported by the CRP (Evergy has agreed to this recommendation in rebuttal).
- Direct Evergy to allow CRP participants to opt out of particular demand response events as needed (Evergy has agreed to this recommendation in rebuttal).
- Direct Evergy to subject its CCN chargers to the same demand response requirements that would apply to participants in the CRP (Evergy has agreed to this recommendation in rebuttal).
- Approve Evergy's revised proposal with respect to the demand response requirements that will apply to CRP recipients, including the revisions it made in response to ChargePoint and its proposal to only throttle charging speed by 50 percent during demand response events.
- Find that Evergy has failed to meet its burden to demonstrate that it is necessary or in the public interest for it to collect any utilization data from CRP recipients other than

the following: number of charging events, total energy (kWh) dispensed, average energy consumption (kWh) per charging event, and average duration of charging events.

- Reject Staff’s recommendation to require CRP incentive recipients to take service on Schedule BEVCS.
- Reject Staff’s recommendation to apply demand response requirements on DCFCs that receive an incentive through the CRP.
- If the Commission finds merit in OPC’s recommendation regarding “interoperable universal charging,” it should find that Evergy’s proposal to require J1772 connectors for Level 2 and CCS Combo and/or CHAdeMO connectors for the CRP will satisfy Dr. Marke’s concerns.
- If the Commission finds merit in OPC’s recommendations regarding “open-source” charging networks, it should avoid the term “open source,” which has no clear definition, and instead adopt a requirement similar to the draft NEVI rules on this issue.

Respectfully submitted on August 22, 2022,

/s/ Scott F. 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 August 22 2022:

/s/ Alicia Zaloga