

**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) File No. ET-2021-0151
for Approval of a Transportation)
Electrification Program.)

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

**MOTION FOR CLARIFICATION AND/OR RECONSIDERATION OF
EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST**

Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“EMM”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“EMW”) (collectively, “Evergy” or “Company”), pursuant to Section 386.500 RSMo and 20 CSR 4240-2.160, files its *Motion for Clarification and/or Reconsideration* (“Motion”) of two aspects of the *Report and Order* (“Order”) issued on January 12, 2022. In support of its motion, the Company states as follows:

1. On pages 34-35 of the Order, the Commission discussed the Company’s request to increase the cap on the number of EV charging stations in both the EMM and EMW service territories:

72. In the Evergy Missouri Metro service area, of the 100 additional stations, 50 would be allotted to the Kansas City Streetlight Charging Project in partnership with the Metropolitan Energy Center. Another four stations would support the emerging use of transportation network company/rideshare. The other 46 stations would provide operational flexibility for Evergy to use, or not, at its discretion.

73. In the Evergy Missouri West service area, of the 50 additional stations, 24 would be allotted to be used in highway corridor locations along secondary and tertiary highways. The other 26 stations provide operational flexibility for Evergy to use, or not, at its discretion. (footnotes omitted)

2. The *Decision* portion of the Order on pages 36-37, the Order states:

The Commission does not believe that the proposed expansion of the Clean Charge Network to include additional fast charging stations in highway corridors is appropriate at this time. Evergy has not provided adequate detail about its plans and this type of highway corridor charging may well be the focus of federal funding efforts. Evergy's request for authority to add 24 additional charging stations in highway corridors in the Evergy Missouri West service territory is denied. That means Evergy will be authorized to add 26 additional charging stations in the Evergy Missouri West service territory to provide operational flexibility for Evergy to use, or not, at its discretion. (emphasis added)

3. The purpose of this motion is to clarify that the Commission intended to approve the Company's request to increase the cap on the CCN in both EMM's and EMW's service areas, as requested by EMM and EMW, with the exception that EMW's request to include 24 additional fast charging station in highway corridors was denied.

4. The Order specifically approves the EMW's request to "add 26 additional charging stations in the Evergy Missouri West service territory to provide operational flexibility for Evergy to use, or not, at its discretion." (Order, p. 36-37). However, the *Decision* portion of the Order does not specifically address or approve EMM's request that it be authorized to expand its CCN by an additional 46 charging stations. The Commission's Order did note that a finding of decisional prudence is not necessary to the Commission's decision regarding Evergy's proposed transportation electrification portfolio. Instead, the Commission stated that the prudence of the Company's investments would be made based upon an evidentiary record in a future proceeding. (Order, p. 41)

5. EMM respectfully requests that the Commission clarify that it intended to approve EMM's request to increase its cap on the CCN by an additional 46 charging stations, as requested by EMM.

6. With regard to the Residential Customer EV Outlet Rebate Program, Evergy requests that the Commission clarify if it intended to authorize a residential customer rebate for either the (1) installation of a hardwired charger; or (2) installation of a 240V outlet that could be used to plug in a EV charger. Evergy has interpreted the Order to authorize a rebate for either method of installing an EV charger under the rebate program.

7. However, the Order is somewhat unclear about whether the rebate would be allowed for the installation of the 240V outlet itself:

34. ChargePoint's second proposed modification asks that Evergy target the proposed rebates for the installation of an EV charging station rather than for the installation of a 240V outlet. The goal of the program is to encourage the installation of charging stations, not outlets, and this change would allow the customer to hardwire an EV charger directly to a 240V circuit rather than install what might be a superfluous outlet. If the customer preferred to install a 240V outlet to plug in an EV charging station they would still be free to do so.

* * *

Decision

The Commission agrees, in part, with two of ChargePoint's proposed modifications. First, the rebate is better targeted toward the installation of an EV charger rather than simply an outlet. Thus, it should be available to customers who would install that charger by directly hardwiring it to a 240V circuit rather than installing what may be an unnecessary outlet. Of course, customers who prefer to be able to plug in a charger should also be able to qualify for the rebate by installing a 240V plug. (emphasis added) (Order, p. 18-19)

8. Evergy has interpreted this section of the Order to mean that a residential customer will be eligible for the rebate if the customer hardwires an EV charger, or alternatively, installs a 240V outlet that can be used to plug-in an EV charger.

WHEREFORE, Evergy Missouri Metro and Evergy Missouri West requests that the Commission clarify and/or reconsider that it intended to (1) authorize an increase EMM's CCN

cap by 46 additional EV charging stations; and (2) to authorize a residential customer EV outlet rebate for the installation of a 240V outlet or a hardwired EV charger.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorneys for Evergy Missouri Metro
and Evergy Missouri West**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand delivered, emailed or mailed, postage prepaid, this 21st day of January 2022, to all parties of record.

/s/ Roger W. Steiner

Roger W. Steiner