Exhibit No.:

Issue(s): Subscriber Solar Tariff
Witness: Sarah L.K. Lange
ring Party: MoPSC Staff

Sponsoring Party: MoPSC Staff
Type of Exhibit: Surrebuttal Testimony

Case No.: ET-2024-0182

Date Testimony Prepared: March 22, 2024

## MISSOURI PUBLIC SERVICE COMMISSION INDUSTRIAL ANALYSIS DIVISION TARIFF/RATE DESIGN DEPARTMENT

## SURREBUTTAL TESTIMONY

**OF** 

**SARAH L.K. LANGE** 

EVERGY METRO, INC. & EVERGY MISSOURI WEST, INC.

**CASE NO. ET-2024-0182** 

Jefferson City, Missouri March 2024

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1	SURREBUTTAL TESTIMONY
2	OF
3	SARAH L.K. LANGE
4	EVERGY MISSOURI METRO, INC. & EVERGY MISSOURI WEST, INC.
5	CASE NO. ET-2024-0182
6	Q. Are you the same Sarah L.K. Lange who filed direct and rebuttal testimony in
7	this matter?
8	A. Yes.
9	EXECUTIVE SUMMARY
10	Q. What is the purpose of your surrebuttal testimony?
11	A. I respond to the rebuttal testimony of Bradley D. Lutz filed on March 13, 2023,
12	on behalf of Evergy Missouri Metro and Evergy Missouri West in which he proposes expanding
13	an optional add-on separately-metered electric vehicle charging rate plan to customers taking
14	service on the Solar Subscription Rider (Program) ("SSP") tariffs of each utility.
15	Mr. Lutz's rebuttal also expresses concern with the complexity of Staff's recommended
16	billing procedures. As my rebuttal addressed the inherent complexity of the SSP and noted that
17	billing complexity may be necessary to reflect the complexity of Evergy's program designs,
18	I will not restate that discussion here. Mr. Lutz's rebuttal also provides slightly more detail
19	concerning Evergy's proposed billing treatments for SSP participants. My concerns with the
20	failure of those billing provisions to reasonably net monthly energy consumption were
21	addressed in my rebuttal, so I will not restate them here.

1	EVERGY'S NEWLY-REQUESTED INCLUSION OF RTOU-EV
2	Q. At page 11, Mr. Lutz testifies that recommended billing provisions
3	"would also apply to the Company's Nights & Weekends Plan - Residential Time of Use -
4	Three Period, Schedule RTOU and EV Only Plan - Separately Metered Electric Vehicle
5	Time of Use, Schedule RTOU-EV." [emphasis added]
6	Is Mr. Lutz's surrebuttal testimony consistent with the tariff filed December 1, 2023 and
7	Mr. Lutz's direct testimony filed February 20, 2024?
8	A. No, it is not. The suspended tariff does not include billing treatment for
9	Schedule RTOU-EV. Mr. Lutz's direct testimony did not propose to modify Evergy's proposed
10	tariff to include RTOU-EV.
11	Q. Does Mr. Lutz's testimony discuss why it now proposes to include the
12	RTOU-EV rate plan as an option for SSP participants?
13	A. No.
14	Q. Is it reasonable to include RTOU-EV as a rate plan in which SSP customers may
15	participate?
16	A. No. The RTOU-EV rate plan is essentially an add-on plan for customers who
17	install a second meter connected only to EV charger load. Staff's concerns since
18	January of 2023 have been that customers who are already SSP participants (1) be billed
19	appropriately on the default residential rate, and (2) have the level of optionality the
20	Commission determines appropriate so that they do not flee the SSP program and shift costs
21	and risks to non-participants. The RTOU-EV rate plan is a new service type and service on the
22	RTOU-EV rate plan cannot be established for an existing customer with existing usage.

Because becoming an RTOU-EV customers requires setting a new meter and establishing a

21

1 new service, there is no concern that an existing SSP participant would be negatively impacted 2 by SPP participation serving as a barrier to becoming a customer on RTOU-EV. 3 Q. In your rebuttal you noted because RTOU customers were previously excluded 4 from participation in the SSP, the Commission could reach a different conclusion for treatment 5 of RTOU customers than for customers taking service on more-differentiated rate schedules. 6 Does Staff's position on RTOU-EV follow the same logic? 7 A. Yes. 8 Q. Does Mr. Lutz discuss why he would allow SSP participation for RTOU-EV 9 service? 10 He does not. A. 11 Q. Does Mr. Lutz discuss why he has added this option in rebuttal? 12 A. He does not. 13 Q. Does Mr. Lutz clarify how any SSP participation would be demarcated between 14 a participant's RTOU-EV usage and a participant's regular electric service? 15 A. No, he does not. Splitting a tranche of SSP participation between RTOU-EV 16 usage and usage on some other rate schedule certainly would add billing complexity, 17 and requiring separate SSP participations for service under each rate schedule would cause 18 unreasonable customer confusion, and risks of misaligning usage and SSP participation 19 between months of the year and rate plans. 20 **CONCLUSION** Does this conclude your surrebuttal testimony? Q. 22 Yes, it does. A.

## BEFORE THE PUBLIC SERVICE COMMISSION

## **OF THE STATE OF MISSOURI**

In the Matter of Evergy Metro, Inc. d/b/a  Evergy Missouri Metro's and Evergy Missouri  West, Inc. d/b/a Evergy Missouri West's Solar  Subscription Rider Tariff Filings  Case No. ET-2024-0182  Case No. ET-2024-0182
AFFIDAVIT OF SARAH L.K. LANGE
STATE OF MISSOURI ) ) ss. COUNTY OF COLE )
COMES NOW SARAH L.K. LANGE and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing <i>Surrebuttal Testimony of Sarah L.K. Lange</i> ; and that the same is true and correct according to her best knowledge and belief.
Further the Affiant sayeth not.
Sanh L.K. Lange
JURAT
Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this day of March 2024.
D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: April 04, 2025 Commission Number: 12412070