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Witness:	Kimberly H. Winslow
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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. ER-2024-0189

SURREBUTTAL TESTIMONY

OF

KIMBERLY H. WINSLOW

ON BEHALF OF

EVERGY MISSOURI WEST

Kansas City, Missouri
September 2024

TABLE OF CONTENTS

SURREBUTTAL TESTIMONY

OF

KIMBERLY WINSLOW

Case No. ER-2024-0189

Q: Please state your name and business address.

A: My name is Kimberly H. Winslow. My business address is 1200 Main, Kansas City, Missouri 64105.

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

A: I am employed by Evergy Metro, Inc. and serve as Senior Director, Energy Solutions for Evergy Metro, Inc. d/b/a as Evergy Missouri Metro ("Evergy Missouri Metro"), Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West," "EMW," or the "Company"), Evergy Metro, Inc. d/b/a Evergy Kansas Metro ("Evergy Kansas Metro"), and Evergy Kansas Central, Inc. and Evergy Kansas South, Inc., collectively d/b/a as Evergy Kansas Central ("Evergy Kansas Central") the operating utilities of Evergy, Inc. ("Evergy").

Q: Who are you testifying for?

A: I am testifying on behalf of EMW.

Q: What are your responsibilities?

A: I lead Evergy's Energy Solutions team within the Community and Customer Solutions Division. I am responsible for developing and executing on Evergy's customer products and services strategy for demand-side management programs, distributed energy resources, customer renewables programs, beneficial electrification, home protection services, and retail solar programs. My team also supports planning and analytics pertaining to product development. In addition, my team is responsible for working cross-collaboratively with our Regulatory team on rates. I have a team of about 30 persons who are focused on product delivery to drive increased customer satisfaction and collaborate with customers on sustainable solutions.

Q: Please describe your education, experience and employment history.

A: I graduated from Missouri University of Science and Technology with a Bachelor of Science degree in Mechanical Engineering in 1990. In 1994, I graduated from Rockhurst University with a Master of Business Administration degree. I began my career at Black & Veatch in 1990 as an equipment engineer in its Gas, Oil and Chemicals Division and then transferred to Black & Veatch's Management Consulting Division. As a project manager and consultant, I worked on various projects for electric, gas, water, and wastewater municipal and investor-owned utilities, ranging in scope from long-term electric and natural gas demand and energy forecasts to regulatory matters such as cost of service, rate design, depreciation studies, and valuation studies.

In December 2007, I began my employment with KCP&L as a Senior Energy Consultant working with KCP&L's large industrial customers. In 2009, I assumed the position of Manager of Energy Efficiency. In 2011, I transferred to our Generation Division as a Senior Quantitative Analyst. In September 2013, I began leading the Energy Solutions team, which at that time, included economic development, products and services, key accounts, and the business center teams. Since the merger of Great Plains Energy, Inc. and Westar Energy, Inc. that created

Evergy, Inc., my role has been focused solely on leading products and services, and I am currently the Senior Director of Energy Solutions. I am also a Professional Engineer in the state of Missouri.

Q: Have you previously testified in a proceeding at the Missouri Public Service Commission ("Commission" or "MPSC") or before any other utility regulatory agency?

A: Yes, I have testified before both the MPSC and the Kansas Corporation Commission ("KCC").

Q: What is the purpose of your surrebuttal testimony?

A: The purpose of my testimony is twofold. First, I will provide response to rebuttal testimony filed by Staff witness Sarah Lange regarding the area of the residential time of use ("TOU") tracker and revenue adjustment. Company witnesses Marisol Miller and Ronald Klote also address these topics. Second, I will provide response to rebuttal testimony filed by Office of the Public Counsel ("OPC")'s Jordan Seaver specific to the area of the Company's proposed rate increase for the Electric Vehicle rate class.

TOU TRACKER AND REVENUE ADJUSTMENT

Q: Please provide context as to the purpose of your testimony with respect to the TOU tracker and revenue adjustment.

A: It's important to ensure that the Commission understands why EMW has proposed a revenue impact adjustment related to the approval of the default TOU rate. Company witness Miller provides foundation as to the need and steps through the mechanics of how she adjusted revenues to reflect the TOU transition that occurred during the test year. However, my testimony further supports the underlying analysis that Ms. Miller relies upon for the adjustment. It is of utmost importance for the Commission to not be confused by Ms. Lange's concerns of the range of the revenue impact analyses that EMW presented and Staff's position that the Company's adjustments are unreasonable.

When the Commission provided its initial Report and Order on November 21, 2022 and then its Amended Report and Order on December 8, 2022 in Docket ER-2022-0129/0130, the Company, Staff, and stakeholders began to immediately assimilate the impacts of the Orders from all aspects and specifically, my surrebuttal testimony refers to assessing impacts related to EMW's transition to default TOU rates. Impacts range from identifying the internal and external resources to implement the TOU rates, the impact to Company revenues, to the impact on a customer's bill, and anything and everything in between. The Company leveraged its partnership with Oracle to assess customer bill and revenue impacts using Oracle's Batch Rate Analysis Tool ("BRAT"), which is the underlying analysis that residential customers rely upon to select from a menu of TOU rates using Oracle's rate comparison tool. Following the approval of the optional 3-period TOU rate in File Nos. ER-2018-0145/0146 in 2019, Evergy has engaged with Oracle to offer the online rate comparison tool, rate coach report, and rate education report to its residential customers to assist customers in their selection of TOU rates. Evergy has previously leveraged the BRAT analyses to inform Commissioners and itself on the impending or actual bill impact of the TOU rates on the various residential customer classes. These presentations and submittals include:

- On the record presentation on August 10, 2023. This presentation presented the impact of the Amended Report and Order deeming the high differential 2-period rate as the default rate. On September 27, 2023, the Commission approved Evergy's Amended Application and Tariff in ET-2024-0061, which approved Evergy's application to switch the default TOU rate in its tariffs from the high differential 2-period TOU rate to the low differential Peak Adjustment TOU rate.
- On August 1, 2024, Evergy submitted a "Time of Use Impact on Residential Space Heating Customers For January-March 2024" in Docket EW-2023-0199 following Commissioner interest expressed in Evergy's January 22, 2024 on the record TOU presentation.

Q: Have the previous results of the BRAT analyses been questioned by the Commission or challenged by Staff or OPC?

A: No, not that I am aware. With respect to Evergy's August 10, 2023 presentation, OPC acknowledged the BRAT analyses results[1] and recommended that the BRAT analyses "can and should be used in the Company's continued educational

[1] Case No. ET-2024-0061, Office of Public Counsel's RESPONSE TO EVERGY'S APPLICATION, REQUEST FOR WAIVER OF 60 DAY NOTICE REQUIREMENT, MOTION FOR EXPEDITED TREATMENT, AND MOTION TO APPROVE TARIFFS ON LESS THAN 30 DAYS' NOTICE; AND MOTION TO DISMISS, Page 1-2

efforts."[2] Moreover, OPC stated that the Company had presented "compelling evidence"[3] from the BRAT analyses presented on August 10, 2023. At no point did OPC challenge or question the BRAT analyses but rather relied upon the BRAT analyses to make its recommendation to the Commission. Furthermore, with respect to Evergy's August 1, 2024 submittal, the Company used the BRAT to analyze the impact of TOU rates on 2024 winter bills of historical space heating customers. I am not aware of any feedback by Staff, OPC, or Commissioners from that analysis until Staff presented issues in rebuttal testimony on August 6 regarding lack of workpapers. I will address this later in my testimony. By all accounts, the BRAT analysis is seemingly viewed as a reliable source to inform the Company, the Commission, and stakeholders on the customer bill and revenue impact resulting from the TOU transition. Therefore, it makes logical sense to leverage the BRAT analysis for the TOU revenue adjustment and rely upon the results that have not been challenged or disparaged. In fact, it is surprising that the BRAT now is questioned as unreasonable. Until TOU rates have been in place for a reasonable amount of time (e.g. 12 months at least), it represents the only detailed analysis that evaluates Evergy specific individual customer usage data modeled across TOU rates as a means to inform on a customer's possible selection of different TOU rates and bill/revenue impacts that might drive those selections.

[2] OPC Memorandum, September 25, 2023, "Policy response to Evergy's suggestion to change the Time-of-Use ("TOU") Default Rate Structure following six months of marketing and education immediately before its implementation", Page 3.
[3] Ibid, Page 4.

Q: Is Ms. Lange's rebuttal testimony accurate with respect to Page 8, Lines 10-13, where she states: "According to Evergy, the BRAT analysis concluded that the revenue produced by those customers would be $9.277 million less than the revenue those customers would have produced on the now-discontinued blocked rates, MORG and MORH, and the preexisting time based rate plan, MORT."

A: It is not clear to me that Ms. Lange has accurately stated what the $9.27 million difference signifies. It is confusing to refer to the "now-discontinued" and "pre-existing" rates without establishing a point in time and further context.

Let me explain how the BRAT analysis was developed to determine the $9.27 million value. This context is necessary for the Commission to understand why EMW's adjustments are reasonable and that Staff has mischaracterized what the value represents.

First, the BRAT analysis considers the "available" customers for the time period being considered, which was the test year for 12 months ending June 30, 2023. Because a customer should confidently review their TOU options based on their historical usage, the BRAT analysis specifies certain customer criteria for its online modeling presentation. For example, "available" customers are defined as those residential customers with greater than 9 months of billing history at June 30, 2023. I also note that there is a small subset of customers that are not eligible for online bill comparison due to modeling limitations, which include those customers on the electric vehicle,[4] solar subscription, net metering or parallel generation

[4] The electric vehicle, or EV, rate is the same rate as the 3-period high differential TOU rate (MORT3); however it is separately metered (not a whole-house TOU rate).

tariffs, or non-AMI metered customers. Therefore, these customers are not included in the BRAT analysis relied upon by EMW for the revenue impact analysis.

Next, the BRAT analysis applied each of the four TOU rates (MORPA, MORT, MORT2, MORT3) to each available customer's historical monthly billed usage for each of the 12 months. The TOU rates applied to the customer's historical monthly billed usage were based on the respective tariffs effective January 9, 2023.

Third, two revenue impact scenarios from the BRAT analysis were summarized. The scenarios summarize the three customer rate classes of MORG, MORH, and MORT for no other reason than it was (and still is) important for the Commission and EMW to understand the impact of the new TOU rates on these three historical customer classes.

- MORG represents the largest residential customer class that was billed under non-time variant rate structure prior to the default TOU transition in November 2023.
- MORH represents the next largest residential customer class that has previously been designated as space heating customers. The historical MORH rate has been referred to as "discounted"; however, EMW would clarify that the historical rates were reflective of the cost to serve the space heating customers in the winter season. The MORH rate was available to existing customers prior to the default TOU transition in November 2023.

- Lastly, MORT represents the customer class that had previously (prior to January 9, 2023) taken service under the optional 3-period TOU rate. This 3-period TOU rate continued to be available to existing customers prior to and after the default transition in November 2023.

The first revenue impact scenario summarizes the monthly revenues for each of the historical rate classes by applying the available customers' historical usage times the Default Time Based Plan ("MORPA" or "Residential Peak Adjustment"), which became effective January 9, 2023, and comparing that to the available customers' historical usage times the customer classes' respective rate that became effective January 9, 2023. The revenue impact analysis resulted in a difference of $56,981.

The second revenue impact scenario summarizes the monthly revenues for each of the historical rate classes based on available customers' "best" available rate. "Best" available rate is defined as the TOU rate that when applied to a customer's monthly energy usage results in the lowest sum of customer bills for the period being analyzed. Again, each of the rates applied were based on tariffs that became effective January 9, 2023. The revenue impact analysis resulted in a difference of $9,277,100.

Q: Can you please further address the historical usage that was utilized in the BRAT analysis for the revenue adjustment?

A: Yes. The BRAT analysis uses the available customers' historical monthly usage for the 12-months ending June 30, 2023 in its rate comparison. It is true that a customer consumes energy (kWh) based on the tariffed rate that was effective at the time of their usage. For example, a space heating customer incurred energy in December 2022 under a cost-based (or also referred to as discounted) rate. However, the BRAT analysis assumes that that same space heating customer would not use energy any differently under any of the TOU rates that became effective January 9, 2023.

Q: Is the assumption that a customer's usage would not change if that customer were billed under a different rate a deficiency in EMW's TOU revenue adjustment?

A: No. It is impossible to apply any analysis that would accurately predict a customer's behavior otherwise. It is also impossible to account for every single difference that could arise with hundreds of thousands of customers, each in a unique situation. Ms. Miller explains in her direct testimony that the TOU revenue adjustment is inexact but that does not mean that the adjustment is not warranted or wrong, especially under the circumstances that the test year represents. The test year is a hybrid of customer usage under TOU rates or not; it is a hybrid of the default TOU rates or not; and it is a hybrid of a menu of TOU rates or not.

To further support EMW's TOU revenue adjustment and the use of the BRAT for the TOU revenue adjustment, below is a high-level summary of the hybrid of the various rate options available to residential customers during the test year period and the mix of rates that were approved from two different rate cases.

Month	Year	Rates Available to Customer/ Significant Commission Orders	Included in Test Year?
July	2022	ER-2018-0145/0146 Blocked Rates and Optional 3-Period TOU Rate Available	Test Year

August	2022	ER-2018-0145/0146 Blocked Rates and Optional 3-Period TOU Rate Available	Test Year
September	2022	ER-2018-0145/0146 Blocked Rates and Optional 3-Period TOU Rate Available	Test Year
October	2022	ER-2018-0145/0146 Blocked Rates and Optional 3-Period TOU Rate Available	Test Year
November	2022	ER-2018-0145/0146 Blocked Rates and Optional 3-Period TOU Rate Available ER-2022-0129/0130 Commission Provides Amended Order with 2-Period TOU Rate as Default	Test Year
December	2022	ER-2018-0145/0146 Blocked Rates	Test Year
January	2023	ER-2022-0129/0130 TOU Rates Effective/ Blocked Rates Still Avl to Existing Customers	Test Year
February	2023	ER-2022-0129/0130 TOU Rates Effective/ Blocked Rates Still Avl to Existing Customers	Test Year
March	2023	ER-2022-0129/0130 TOU Rates Effective/ Blocked Rates Still Avl to Existing Customers	Test Year
April	2023	ER-2022-0129/0130 TOU Rates Effective/ Blocked Rates Still Avl to Existing Customers	Test Year
May	2023	ER-2022-0129/0130 TOU Rates Effective/ Blocked Rates Still Avl to Existing Customers	Test Year
June	2023	ER-2022-0129/0130 TOU Rates Effective/ Blocked Rates Still Avl to Existing Customers	Test Year
July	2023	ER-2022-0129/0130 TOU Rates Effective/ Blocked Rates Still Avl to Existing Customers	
August	2023	ER-2022-0129/0130 TOU Rates Effective/ Blocked Rates Still Avl to Existing Customers	
September	2023	ER-2022-0129/0130 TOU Rates Effective/ Blocked Rates Still Avl to Existing Customers	
October	2023	ET-2024-0061 - Commission Approves Evergy's Amended Application and Revised Tariffs with Residential Peak Adjustment Time Based Plan as Default Rate ER-2022-0129/0130 TOU Rates Effective/Blocked Rates Still Avl to Existing Customers	
November	2023	EMW Transition to ET-2024-0061 TOU Default Rate Begins/ ER-2022-0129/0130 Blocked Rates Avl to Existing Customers	
December	2023	Transition Complete to TOU Default Rates	
January	2024	TOU Default Rates In Place	EMW Rate Case Filed
February	2024	TOU Default Rates In Place	
March	2024	TOU Default Rates In Place	
April	2024	TOU Default Rates In Place	
May	2024	TOU Default Rates In Place	

June 2024	TOU Default Rates In Place		
July 2024	TOU Default Rates In Place		
August 2024	TOU Default Rates In Place		

The BRAT analysis should not be discounted as it is the best source of information available for the Commission to evaluate the impact of the TOU rates on EMW revenue for the test year.

Q: Ms. Lange shares her disapproval of the fact that EMW did not provide an updated BRAT analyses for the 12 months ending June 30, 2024. How do you respond?

A: I was not privy to the conversations that Ms. Lange refers to but I can certainly respond on several fronts.

- First, Evergy has not received any data request from Staff for additional information to support its August 1, 2024 submittal of "Time of Use Impact on Residential Space Heating Customers For January January-March 2024" in Docket EW-2023-0199. As I stated earlier, any concern over the level of information provided in the space heating customer analysis was not known until I reviewed Ms. Lange's rebuttal testimony, and there has been no subsequent data requests from Staff. Also, I disagree with Ms. Lange's assertion that the "filed document contains minimal information". Evergy's submittal contains exactly what it committed to providing, which was to provide an understanding of the winter bill impact (January-March 2024) on heating customers due to the recent transition to TOU default rates. In fact, Evergy included two slides of Key Findings of the analyses. One could conclude that because there were no follow up questions on

Evergy's submittal, that the analysis was complete and did not require any additional explanation.

- Second, Ms. Lange underestimates the level of modeling and work that a BRAT analysis requires to complete by Oracle and review by Evergy once the results are provided. Additionally, Evergy incurs a cost for Oracle to perform any analyses that is customized, or specific to Evergy's needs.
- Let me further elaborate on the level of effort for the winter impact analyses that was performed. Given the transition to default TOU rates, there is no longer a specific end-use rate associated with space heating, Evergy does not identify space heating customers any longer in its billing system and therefore identification of space heating customers is based on previous information provided by Evergy to Oracle. Opower utilized it repository of information to identify customers who were previously on the MORH rate as a "heating customer". Also, billing data for usage through March 31, 2024 is not immediately available—due to billing cycles, data availability spills over to mid-April. Once Opower receives the billing data, modeling ensues—again, it is specialized, results are calculated as an output and then the results are analyzed for reasonableness and understanding and reviewed by both Opower and Evergy. Additionally, results must be presented (and filed) in a readable and understandable manner using a PowerPoint format.
- Lastly, while Staff belabors the point that Evergy did not provide the heating customer BRAT analysis within 12-14 weeks as it had stated, Ms.

> Lange does not admit that the analyses would have done her no good: (1) the BRAT analyses was performed for heating customers only and only for the winter period, and (2) she intimates that Evergy did not provide the BRAT analysis for "12 months ending June 2024 as soon as it was available". If this analysis were available, Evergy would need to complete its billing of customers for usage incurred through June 30, 2024 (which would be about mid-July at the earliest Opower would receive the data) and then Opower would need to run the specialized BRAT analysis, analyze the results and provide it in an understandable manner. This certainly could not have all happened by Staff's filing date of direct testimony by June 27 (revenue requirements) or July 12 (rate design).

So, the fact that she insinuates that Evergy missed its date which caused Staff to not have the information available to "evaluate appropriate revenue adjustments in this case" is inaccurate and irrelevant. Staff has the same information that the Company has to adjust test year revenues, which Ms. Miller has fully explained and substantiated in her testimonies.

Q: Company witness Klote also addresses the use of the BRAT analysis for the purposes of a TOU tracker. Do you have anything additional to offer in your testimony?

A: Company witness Klote fully rebuts Staff's position that the Company has "abandoned"[5] its request for a TOU tracker. As explained by Mr. Klote, EMW determined that the BRAT analysis is not a workable solution to leverage for the

[5] Lange Rebuttal testimony, Page 22, Line 8.

TOU tracker mechanism. As I stated earlier, while Oracle has customized the BRAT analyses to model customer rate impacts for Evergy and the BRAT provides for a reliable rate comparison methodology, it cannot readily offer granularity that will be needed – and expected - for the TOU tracker. The BRAT was not designed and developed to support a TOU rate tracker mechanism; therefore, EMW sought an alternative proposal from a different vendor. EMW has not entered into any contract with the alternative vendor. To do so would be imprudent until the Commission approves the TOU tracker mechanism. EMW has discussed the scope of work with the alternative vendor in detail but it will continue to refine throughout this case. I also offer that the Company is not opposed to sharing the proposed TOU tracker scope of work with Staff so that Staff can understand how the Company intends to track the revenue differences; however, as Mr. Klote states, the tracker methodology is not what is up for debate in this case – it is the need for the TOU tracker mechanism, which the Company has fully demonstrated. Staff and parties will have the opportunity to fully audit the methodology used for the tracker mechanism when EMW presents it for review in its next rate case following approval in this case.

Q: Ms. Lange accuses EMW of changing its mind from using a method with significant flaws[6] to an unknown methodology. How do you respond?

A: I take great offense that Ms. Lange labels the BRAT analyses to have significant flaws. It absolutely does not. The BRAT analysis was designed for a specific purpose in mind and Oracle customized its solution for Evergy to evaluate customer

[6] Lange Rebuttal, Page 24, Lines 14-17

impacts from the TOU transition to then share with the Commission and stakeholders. Evergy has repeatedly clarified the basis and assumptions of the BRAT analyses. EMW should not be ridiculed for trying to leverage an existing vendor's methodology with the intent of minimizing cost and effort. EMW was in the process of scoping what it believed to be necessary for the revenue tracker in its response to the data requests offered by Ms. Lange in her rebuttal testimony. EMW offered answers in response to Staff's data requests truthfully and provided the costs of the relevant analyses as requested.

EV RATE CLASS ADJUSTMENTS

Q: What increases have Evergy proposed for the Electric Vehicle ("EV") rate class, comprised of the CCN, BEVCS, and ETS rates?

A: As detailed in Ms. Miller's direct testimony[7], the Company has proposed the following increases for the rates comprising the EV rate class:

- Clean Charge Network ("CCN") - 16.59%
- Business EV Charging Service ("BEVCS") - 13.03%
- Electric Transit Service ("ETS") - 13.03%

Q: What is the Company's rationale for the proposed increases to the CCN, BEVCS, and ETS rates?

A: The Company approached its proposed rate increases for the CCN and the BEVCS/CCN by aligning with the proposed increases for the best applicable customer's end-use of the service provided by the rate. The Company has tied the proposed CCN rate increase to the proposed Residential rate increase. This tie was

[7] Miller Direct testimony, pps. 26, 31.

made on the basis that the CCN is primarily used for personal vehicles and is particularly vital for EV drivers who cannot charge their vehicle where they live, whether it be at a single-family or multi-family dwelling.

The Company has tied the BEVCS/ETS rate increases to the Large General Service ("LGS") rate increase on the basis that the LGS rate served as the foundation for the BEVCS and ETS rate designs when the Company first proposed these rates. Please see Company witness Brad Lutz's testimony in ET-2021-0151.

The proposed rate increases reflect the Company's intent to employ a gradual approach to adjusting revenues and rates. We believe this approach aligns with sound rate design principles and avoids detrimentally large rate increases.

Q: How does this gradualism approach support what the Company is seeing with respect to EV drivers use of the CCN charging stations?

A: Evergy has continued to see CCN annual usage increase. In fact, CCN usage within EMW increased 74% during the period of July 2023 through June 2024 (i.e. the 12-month period following the test year).

Q: Does OPC witness Jordan Seaver's proposed 60% increase to the EV rate class comport with Evergy's approach to rate increases?

A: Absolutely not. Evergy firmly believes a 60% step increase to the fueling costs of current EV operators is *prima facie* detrimental to these customers. Further, Evergy believes the detrimental impacts of OPC's proposed increase extend to non-EV customers due to the potentially chilling impact on EV adoption, as further discussed below.

Q: In what ways might a 60% increase to the CCN rate be detrimental?

A: OPC recommends increasing the fueling costs of (primarily) consumer EVs by 60%. When considering the potential impacts of this increase, it is helpful to bear in mind the variety of CCN user personas, including:

- Local drivers who have access to charging at home
- Local drivers who do not have access to charging at home
- Transient drivers who are traveling to or through Evergy's service territory

Within this context, Evergy expects two main impacts:

1. Net Decrease in EMW CCN Revenue

Given the variety of users, CCN demand will exhibit some amount of price elasticity. As such, the proposed 60% rate increase is likely to significantly lower overall usage. EV drivers will seek out less expensive stations and/or shift more of their charging to home if that is an option. This last point is critical: EV drivers who do not have access to charging at home will bear the brunt of OPC's proposed rate increase unless sufficient alternatives are available at a lower cost. Notably, these alternatives could include CCN stations in Evergy's MO Metro service territory. EV drivers who do not have access to charging at home are generally apartment dwellers who rely on public charging access, such as the CCN. To draw a finer point on this, approximately 30% of US households are multi-family dwellings[8]. Furthermore, public charging access is lower in groups with below-median

[8] https://atlaspolicy.com/wp-content/uploads/2021/01/EV-Charging-at-Multi-Family-Dwellings.pdf

household incomes and in those with a Black and Hispanic majority populations. Public charging access disparities are more pronounced in areas with a higher proportion of multi-unit housing, where they are critical for EV operation due to a lower likelihood of residential charger access.[9]

2. Decrease in EV Adoption / Population

A 60% increase in the cost to use the CCN is certain to generate a negative public reaction among current and potential future customers. Within the latter group of potential future customers, the negative perception of this price hike is likely to extend towards EVs more generally, which will translate to a decrease in EV sales. Within the former group of current CCN customers, the proposed 60% increase and associated fear of future shock-increases could motivate customers to go back to internal combustion vehicles, which would reverse the benefit to be gained from EV adoption.

Q: In what ways might a 60% increase to the BEVCS and ETS rates be detrimental?

A: OPC recommends increasing the fueling costs of customers using EVs for business and transit by 60% during a time when BEVCS and ETS rate participation is in its nascency. There are currently a total of six customers on these non-residential, time-of-use rates (ETS-1, BEVCS-5). These customers include two public school districts, a large municipality, and one public charging provider. It is likely that these customers would have made different long-term investment decisions with their fleet had they realized rates could increase dramatically and as much as 60

[9] https://www.sciencedirect.com/science/article/pii/S0967070X20309021

percent. Similar to the CCN, energy sales for the BEVCS and ETS have significantly increased during the 12 months following the test year. Specifically:

Rate	Test Year (kWh)	Test Year + 1 (kWh)	% Increase
BEVCS	0	41,539	247%
ETS	133,285	420, 781	

Given the newness, limited enrollment, and extremely modest usage of these rates, Evergy believes a 60% shock-increase in price is completely unjustified, detrimental to current customers, and potentially calamitous to the business case for future EV adoption. Moreover (and somewhat ironically), in a time when Evergy is striving to shape consumer behavior via time-of-use rates, OPC's proposal would have the opposite effect of motivating customers to eschew time-of-use rates for EV charging.

Q: Does Evergy agree with OPC's characterization that EV adoption in the Kansas City region has been "very slow"?

A: No. The 7-year compound annual growth rate ("CAGR") for the EV population in EMW from 2017 through 2023 is 41%. This hardly seems "very slow", especially since this period straddles the pandemic. More recently, the EV population in EMW grew from 1,016 to 3,467 during the three-year period 2021-2023 (50% CAGR). During the final year of that period (i.e. 2023), the EV population grew 72%. Looking into 2024, as of June the estimated EV population for EMW is 4,148. This corresponds to a nearly 40% annualized growth rate despite the ongoing, well-publicized slowdown in EV sales nationally.

Q: Has CCN utilization grown alongside EV adoption?

A: Yes. As I mentioned earlier, CCN usage within EMW increased 74% during the period of July 2023 through June 2024 (i.e. the 12-month period following the test year). This illustrates both the sensibility of applying gradual rate adjustments and the difficulty of setting appropriate rates using a historical test year.

Q: Does the CCN play a role in EV adoption?

A: Yes. Myriad consumer surveys and other references could be cited here to demonstrate the importance of public charging infrastructure. However, researchers at the University of Texas (Arlington) recently conducted an exhaustive survey of pertinent works to empirically identify the factors affecting consumers' intention to adopt EVs. This study, which included examination of 537 publications, found that the most cited barriers to adoption of EVs were found to be the lack of charging station availability and their limited driving range[10].

Q: How much EV adoption has resulted from the CCN?

A: While the University of Texas research supports the assertion that EV adoption is influenced by the CCN, the question remains: how much? Evergy believes it is reasonable to assume CCN attribution is between 5% and 10%. That is to say, the CCN is a decisive factor in five to ten vehicle purchase decisions out of every 100. Using this assumption, it is possible to estimate the incremental revenue generated by (i.e. attributable to) the CCN.

Consider:

- There were nearly 3,500 EVs within EMW as of YE2023

[10] https://www.sciencedirect.com/science/article/pii/S2773153724000057

- On average, each EV is assumed to consume approximately 3,400 kWh/yr
- $0.10 of revenue per kWh
- Attribution rate of 5%-10%

Given the above, the estimated incremental revenue from EVs where the CCN was a decisive factor in the owner's purchase decision is between $60K and $120K. Again, this represents revenue *that would not exist absent the CCN*.

Notably, this "CCN attributable" revenue is comparable to:

- The incremental revenue between Evergy's proposed rate increase and OPC's proposed 60% rate increase ($71K per OPC Testimony, p. 5)
- The totality of EV Rate class test year revenue (< $90K)

Q: Do you expect that the cost - revenue relationship will change in the future?

A: Yes. Utilities and other stakeholders have asserted for many years that EVs will put downward pressure on rates to the benefit of all customers. Fortunately, there is now a formidable and increasing amount of analytical support for this assertion. On a retrospective basis, a recently updated study by Synapse concluded that across all regions of the United States, EV revenues exceeded utility costs—*including utility program costs*—during the period 2011-2021[11]. On a forward-looking basis, California's Public Advocates Office ("CPAO") and the California Public Utility Commission separately concluded that electrification *will* result in downward

[11]https://www.synapse-energy.com/sites/default/files/Electric%20Vehicles%20Are%20Driving%20Rates%20Down%20for%20All%20Customer%20Update%20Jan%202024%2021-032.pdf)

pressure on residential rates for California's three largest investor-owned utilities[12]. Once again, this result is inclusive of the CA IOU's considerable EV-related program costs.

Together with smart infrastructure investment and off-peak charging, EVs will generate revenues exceeding their cost to serve. From this perspective, OPC's proposed 60% rate increase would not only harm individual customers but could also jeopardize the collective benefits of electrification for all Evergy customers.

Q: Should the Commission approve OPC's recommended increase for the EV Rate class?

A: No. Increasing the fueling costs for current EV customers by 60% is punitive and will decelerate EV adoption to the financial detriment of all Evergy customers. Rather than proposing shock-increases that have the potential to "kill EV adoption in the crib", OPC should recognize the value EVs provide to all utility customers and collaborate with utilities on cost effective programs that encourage EV adoption while minimizing the cost to serve. The Commission should approve EMW's recommended increase for the EV Rate class for reasons stated in my testimony.

Q: Does that conclude your testimony?

A: Yes, it does.

[12] https://www.publicadvocates.cpuc.ca.gov/press-room/reports-and-analyses/distribution-grid-electrification-model-findings

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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-2024-0189

AFFIDAVIT OF KIMBERLY H. WINSLOW

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Kimberly H. Winslow, being first duly sworn on his oath, states:

1. My name is Kimberly H. Winslow. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Senior Director, Energy Solutions

2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of Evergy Missouri West consisting of twenty-three (23) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

Kimberly H. Winslow

Kimberly H. Winslow

Subscribed and sworn before me this 10th day of September 2024.

Anthony R. Westenkirchner

Notary Public

My commission expires: 4/26/2025

ANTHONY R. WESTENKIRCHNER
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 26, 2025
PLATTE COUNTY
COMMISSION #17279952