

**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. )

**JOINT LIST OF ISSUES, ORDER OF WITNESSES, ORDER OF CROSS-  
EXAMINATION AND ORDER OF OPENING STATEMENTS**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), and on behalf of Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”), and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) (collectively “Evergy”), the Office of the Public Counsel (“OPC”), Union Electric Company d/b/a Ameren Missouri (“Ameren”), The Empire District Electric Company (“Empire”), Spire Missouri Inc. (“Spire”), Midwest Energy Consumers Group (“MECG”), Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”), Natural Resources Defense Council (“NRDC”), Sierra Club (“Sierra Club”) and ChargePoint, Inc. (“ChargePoint”) (collectively the “Parties”) pursuant to the Commission’s *Order Setting Procedural Schedule and Suspending Tariffs* (“Order”) issued May 26, 2021 and files this Joint List of Issues, Order of Witnesses, Order of Cross-Examination and Order of Opening Statements.

## LIST OF ISSUES<sup>1</sup>

1. Should the Commission approve Evergy's proposed Residential Customer EV Outlet Rebate Program?
  - a. If the Commission approves Evergy's proposed Residential Customer EV Outlet Rebate Program, should the Commission require that participants also sign up for the Company's existing whole house, opt-in TOU rate?
  - b. If the Commission approves Evergy's proposed Residential Customer EV Outlet Rebate Program, should the Commission modify the program consistent with ChargePoint's recommendations?
2. Should the Commission approve Evergy's proposed Residential Developer EV Outlet Rebate Program?
3. Should the Commission approve Evergy's proposed Commercial EV Charger Rebate Program?
  - a. If the Commission approves Evergy's proposed Commercial EV Charger Rebate Program, should the Commission modify the program consistent with ChargePoint's recommendations?
  - b. If the Commission approves Evergy's proposed Commercial EV Charger Rebate Program, should the Commission require that 20 percent of Commercial Rebates be reserved for multi-family locations?
  - c. If the Commission approves Evergy's proposed Commercial EV Charger Rebate Program, should the Commission order rebate incentive amounts be capped on a percentage basis to not exceed 20% of the total costs for a charger station.

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<sup>1</sup> Not all parties agree that all the listed issues are actually issues to be decided in the case.

4. Should the Commission approve Evergy's proposed Electric Transit Service Rate?
  - a. Is it lawful for the Commission to approve a rate for this new service outside of a general rate case?
  - b. Is it lawful for the Commission to approve a rate for this new rate at this time given the Company has elected PISA?
  - c. If the Commission does approve the new rate, should the Company use the revenue received from the rate schedule to offset the costs Evergy is requesting to defer to a regulatory asset account?
  
5. Should the Commission approve Evergy's proposed Business EV Charging Service Rate?
  - a. Is it lawful for the Commission to approve a rate for this new service outside of a general rate case?
  - b. Is it lawful for the Commission to approve a rate for this new rate at this time given the Company has elected PISA?
  - c. If the Commission does approve the new rate, should the Company use the revenue received from the rate schedule to offset the costs Evergy is requesting to defer to a regulatory asset account?
  
6. Should the Commission approve Evergy's proposed cap increase for the Clean Charge Network Expansion?
  - a. Should the Commission approve Evergy's request to expand its CCN along the highway corridors?

- b. Should the Commission approve Evergy’s request to partner with the Metropolitan Energy Center and the City of Kansas City, Missouri to pilot streetlight charging installations in the city’s right of way?
  - c. Should the Commission approve Evergy’s request to utilize some of the charging stations under the cap towards use by transportation network companies (“TNCs”)/rideshare companies?
  - d. Should the Commission approve Evergy’s request that the Commission find that the limited and targeted CCN expansion plans Evergy has proposed in this filing are prudent from a decisional perspective?
  - e. Should the Commission 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?
7. Should the Commission approve Evergy’s proposed Customer Education and Program Administration proposal?
8. Should the Commission approve Evergy’s proposal to administer the new pilot rebate programs over a five-year period, beginning in the first quarter of 2022 and concluding in the first quarter of 2027, including periodic reporting to the Commission and stakeholders?
9. Should the Commission approve Evergy’s request that the Commission authorize the Company to use a regulatory asset tracking mechanism to track and defer the pilot program costs which include rebate incentives and certain associated customer education and administrative costs?
- a. Should the Commission approve the requested 5-year amortization timeframe requested as part of this case?

10. Should the Commission approve Evergy's requests for a variance of subsections 4 CSR 240-14.020(1)(B), (1)(D), and (1)(E) only as those subsections are applied to the pilot programs as described in any approved compliance tariffs resulting from this case?

**ORDER OF OPENING STATEMENTS**

1. Evergy
2. Ameren Missouri
3. Empire
4. Spire
5. ChargePoint
6. Renew Missouri
7. NDRC
8. Sierra Club
9. MCEG
10. Staff
11. OPC

**ORDER OF WITNESSES**

1. Chuck Caisley (Evergy)
2. Stacy Noblet (Evergy)
3. Nick Voris (Evergy)
4. Kimberly Winslow (Evergy)
5. Tim Nelson (Evergy)

6. Brad Lutz (Evergy)
7. Darrin Ives (Evergy)
8. Justin D. Wilson (ChargePoint)
9. Max Baumhefner (Sierra Club/NRDC)
10. Sarah L. K. Lange (Staff)
11. Claire Eubanks (Staff)
12. Kimberly K. Bolin (Staff)
13. J Luebbert (Staff)
14. Robin Kliethermes (Staff)
15. Geoff Marke (OPC)

#### **ORDER OF CROSS EXAMINATION**

1. Evergy Witnesses: Ameren, Empire, Spire, ChargePoint, Renew Missouri, NDRC, Sierra Club, MECG, OPC, Staff
2. ChargePoint Witness: Staff, OPC, MECG, Sierra Club, NDRC, Renew Missouri, Spire, Empire, Ameren, Evergy
3. Sierra Club/NRDC Witness: Staff, OPC, MECG, ChargePoint, Renew Missouri, Spire, Empire, Ameren, Evergy
4. Staff Witnesses: OPC, MECG, Sierra Club, NDRC, Renew Missouri, ChargePoint, Spire, Empire, Ameren, Evergy
5. OPC Witness: Staff, MECG, Sierra Club, NDRC, Renew Missouri, ChargePoint, Spire, Empire, Ameren, Evergy

Respectfully submitted,

/s/ Nicole Mers

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Missouri Public Service Commission  
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**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, to counsel for all parties on this 21<sup>st</sup> day of September, 2021.

/s/ Nicole Mers