

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

**REBUTTAL TESTIMONY
OF
JULIE DIETRICH**

**ON BEHALF OF
EVERGY METRO, INC., EVERGY KANSAS CENTRAL, INC.
AND EVERGY KANSAS SOUTH, INC.**

**IN THE MATTER OF THE APPLICATION OF EVERGY METRO, INC., EVERGY KANSAS
CENTRAL, INC., AND EVERGY KANSAS SOUTH, INC. FOR APPROVAL OF ITS PHASE
2 TRANSPORTATION ELECTRIFICATION PORTFOLIO.**

DOCKET NO. 25-EKCE-169-TAR

FEBRUARY 20, 2024

1 **Q: Please state your name and business address.**

2 **A:** My name is Julie Dietrich. My business address is 1200 Main, Kansas City, Missouri
3 64105.

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

5 **A:** I am employed by Evergy Metro, Inc. I serve as Lead Program Manager – Fleet
6 Electrification for Evergy, Inc., Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy
7 Missouri Metro”) and Evergy Kansas Metro (“Evergy Kansas Metro”); Evergy Missouri
8 West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”); and Evergy Kansas
9 Central, Inc. d/b/a/ Evergy Kansas Central (“Evergy Kansas Central”).

10 **Q: On whose behalf are you testifying?**

11 **A:** I am testifying on behalf of Evergy Kansas Metro and Evergy Kansas Central (collectively,
12 “Evergy” or “Company”).

13 **Q: What are your responsibilities?**

14 **A:** I develop and implement transportation electrification programming, manage internal and
15 external stakeholder relationships, and support fleet electrification projects. I collaborate
16 with various internal departments to ensure seamless program execution. I design and
17 launch new fleet electrification programs, continuously seeking process improvements to
18 enhance efficiency. I also deliver performance updates, while ensuring compliance with
19 utility regulations and tariffs.

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

21 **A:** I graduated from Park University with a Bachelor of Science in Business Administration
22 in 2018 and from Longview College with an Associate of Arts in Business Management in
23 2015. I have worked for what is now Evergy since 1993 through multiple mergers and

1 company names. I have held positions as a Quality Assurance & Training Manager at
2 Aquila, Manager of Quality Assurance, and Marketing Communications Manager at
3 Kansas City Power & Light, Manager of Customer Experience, and currently as Lead
4 Program Manager – Fleet Electrification at Evergy.

5 **Q: Have you previously testified in a proceeding at the Kansas Corporation Commission**
6 **(“KCC”) or before any other utility regulatory agency?**

7 **A:** No.

8 **Q: What is the purpose of your rebuttal testimony?**

9 **A:** The purpose of my testimony is to respond to Staff’s recommendations regarding Evergy’s
10 proposed Fleet Advisory Services (FAS) Program design.

11 **Q: Provide a brief overview of your rebuttal testimony.**

12 **A:** My rebuttal testimony addresses Staff’s recommendations regarding Evergy’s proposed
13 FAS Program design. Specifically, I respond to four key revisions suggested by Staff:

- 14 1. Providing grid-friendly advice to all fleet customers,
- 15 2. Establishing stand-alone program levels with clear on-ramps and off-ramps,
- 16 3. Limiting right-sizing charging advice to small private and public entities, and
- 17 4. Offering a list of third-party advisors to all fleet customers.

18 Additionally, I outline our approach to developing an educational and outreach plan for the
19 FAS Program.

20 **Q: Does Evergy agree with Staff’s recommendation that its FAS program design should**
21 **include providing grid-friendly advice to all fleet customers?**

22 **A:** Yes. Evergy finds Staff’s recommendation to provide grid-friendly advice to all fleet
23 customers to be consistent with Evergy’s proposed design.

1 **Q: How does Evergy's program design address the recommendation for stand-alone**
2 **levels with clear on-ramps and off-ramps?**

3 **A:** Evergy generally agrees with Staff's recommendation to have program levels with clear
4 on-ramps and off-ramps. This approach aligns with our current design. We believe the
5 three levels of service do essentially act as stand-alone levels consistent with Staff's
6 recommendations. However, customer needs can vary from customer to customer even
7 within a specific level. Therefore, a flexible approach focusing on customer-specific needs
8 is necessary. With respect to recommended off-ramps and on-ramps, Evergy intends to
9 use the first fleet advisory call with the customer as the entry point (on-ramp) to the
10 program. During this call, we will:

- 11 • Assess program suitability based on project scope, required effort, and alignment with
12 FAS Program objectives.
- 13 • Determine the appropriate off-ramp based on customer qualifications, completed work
14 at the time of application, and specific needs within the program offering.

15 Therefore, Evergy believes its program effectively incorporates equivalents of Staff's
16 recommendations for stand-alone levels of service, and clear on-ramps and off-ramps for
17 participation in the program.

18 **Q: Should Evergy separate right-sizing from grid-friendly advice in a different level of**
19 **service?**

20 **A:** Separating right-sizing from grid-friendly advice in a different level of service will help to
21 quantify program benefits, and Evergy agrees right-sizing should be provided in a second
22 level of service. Whether that second level is characterized to customers as building on the
23 first level, or instead as a separate level that also includes all services of the first level, is

1 irrelevant to Evergy. The two approaches are equivalent in substance, and Evergy believes
2 the best solution would be to afford Evergy discretion to select the approach that would be
3 most easily understood by customers.

4 **Q: Should Evergy limit access to right-sizing charging advice to public entities and small
5 private businesses?**

6 **A:** No. Limiting right-sizing charging advice to public entities and small private businesses
7 leaves potential program benefits “on the table.” While Evergy does not expect many large
8 private fleets to request FAS Program support, those that do may have barriers to selecting
9 third-party advisors that neither Evergy nor Staff have anticipated. However, treating the
10 FAS Program as a pilot, it would be more appropriate to allow participation by those
11 customers and gather data on any barriers they faced in selecting a third-party advisor.

12 **Q: Should Evergy provide a list of third-party advisors to all fleet customers?**

13 **A:** No. Evergy should not be required to provide and manage a list of third-party advisors.
14 Doing so would add cost and complexity by requiring Evergy to define and potentially
15 qualify the services of these advisors. Additionally, if the pilot aims to understand free
16 ridership, knowledge of the availability of third-party advisors is a potential barrier to
17 examine. Instead of offering such a list, Evergy’s EM&V should include asking customers
18 about their knowledge of third-party advisors. If a significant gap is found, it can be
19 addressed in the potential continuation of the pilot as a program, if authorized.

20 Moreover, offering a list introduces additional risks, including:

- 21 • Perceived Endorsement: Customers might interpret the list as an endorsement and
22 hold Evergy responsible if an advisor performs poorly.

- 1 • Selection Fairness: Without clear criteria, stakeholders might question why certain
2 advisors are on the list and have concerns about the fairness of the selection process

3 **Q: How will Evergy ensure that the communication plan includes the details outlined on**
4 **page 50 of Staff’s testimony?**

5 **A:** Evergy concurs with Staff’s recommendation to create an educational and outreach plan
6 for the Pilot. Once the final program details are approved by stakeholders and the
7 Commission, the Evergy communication team will develop a campaign strategy that
8 considers the agreed-upon programs, individual requirements, identified customer
9 segments, and desired outcomes and goals. A key factor in developing this outreach and
10 education strategy will be the final approved program and stipulation information, making
11 it crucial to wait for approval before building out communication strategies. Since many
12 program details, such as audience, goals, and budgets, can change during the stakeholder
13 approval process, it is important to wait to develop an outreach plan to incorporate
14 stakeholder feedback. This approach has been consistently used in past program approvals
15 and stakeholder discussions, including for KEEIA 22-EKME-254-TRA, Electrification
16 Filing 21-EKME-320-TAR, and Time of Use Rate outreach. Similar to these past education
17 plans, Evergy will use key performance indicators and benchmarking to evaluate campaign
18 performance. Our recently filed Electrification marketing plan and KEEIA marketing plan
19 are good examples of how we develop comprehensive outreach plans with measurements,
20 which were each filed about six months after program approval.

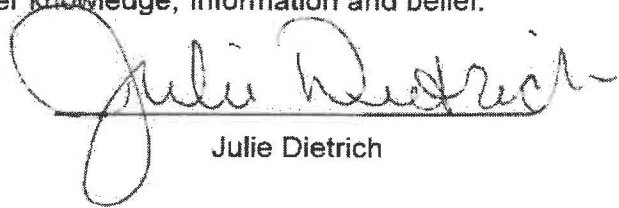
21 **Q: Does this conclude your prepared Rebuttal Testimony?**

22 **A:** Yes, it does.

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

VERIFICATION

Julie Dietrich, being duly sworn upon her oath deposes and states that she is the Lead Product Manager, for Evergy, Inc., that she has read and is familiar with the foregoing Testimony, and attests that the statements contained therein are true and correct to the best of her knowledge, information and belief.


Julie Dietrich

Subscribed and sworn to before me this 20th day of February, 2025.


Notary Public

My Appointment Expires:

May 30, 2026



CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed, this 20th day of February 2025, to all parties of record as listed below:

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