BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

DIRECT TESTIMONY OF

KIMBERLY H. WINSLOW

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

IN THE MATTER OF THE APPLICATION OF EVERGY KANSAS CENTRAL, INC. AND EVERGY KANSAS SOUTH, INC. FOR APPROVAL TO MAKE CERTAIN CHANGES IN THEIR CHARGES FOR ELECTRIC SERVICE PURSUANT TO K.S.A. 66-117.

Docket No. 25-EKCE-294-RTS

January 31, 2025

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Kimberly H. Winslow. My business address is 1200 Main Street, 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 Evergy Kansas Metro ("EKM"), and Evergy Kansas Central, Inc. and Evergy South, Inc., collectively d/b/a as Evergy Kansas Central, Evergy Metro, Inc. d/b/a as Evergy Missouri Metro ("Evergy Missouri Metro"), and Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West") the operating utilities of Evergy, Inc.

Q. On whose behalf are you testifying?

A. I am testifying on behalf of Evergy Kansas Central ("EKC" or "Company").

Q. What are your responsibilities?

A. I lead the Energy Solutions team of Evergy, Inc.'s operating utilities customer products and services strategy for demand-side management programs, distributed energy resources, customer renewables programs, beneficial electrification and 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 customer rates. I have a team of about thirty people focused on product delivery to drive increased customer satisfaction and to 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 the Gas, Oil and Chemicals Division and then transferred to the company'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 large industrial customers. In 2009, I assumed the position of Manager of Energy Efficiency. In 2011, I transferred to the 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., I have been focused solely on leading products and services development, 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 Kansas Corporation Commission ("Commission" or "KCC") or before any other utility regulatory agency?

A. Yes. I have testified before both the KCC and the Missouri Public Service Commission ("MPSC").

Q. What is the purpose of your testimony and how is your testimony organized?

A. The purpose of my testimony is to:

- Provide the KCC with an update on EKC's Rate Modernization effort discussed in my testimonies in Docket No. 23-EKCE-775-RTS ("23-775 Docket");
- Provide the KCC with an update on the Residential Battery Energy Storage Pilot approved in the 23-775 Docket;
- Request that the KCC allow EKC to continue to recover education and marketing costs for EKC's time-of-use ("TOU") rates in a regulatory asset account as the KCC authorized in the 23-775 Docket;
- Introduce EKC's new payment assistance pilot program, "Stay Connected";
- Explain and support the reasonableness of the rate increase applied to transportation electrification schedules;[1] and
- Summarize my recommendations

Q. Are you sponsoring any exhibits through your testimony?

A. No, I am not.

II. RATE MODERNIZATION UPDATE

Q. Please provide an update on the Rate Modernization Plan ("Rate Plan") that you addressed in your testimonies in the 23-775 Docket.

A. The drivers and objectives of the Rate Plan are still true today: technology-enabled opportunities are prevalent; consumer expectations continue to evolve; customer adoption of behind-the-meter ("BTM") technologies continues to increase; and impacts to and

[1]The transportation electrification schedules include Public Electric Vehicle Charging Service (Schedule CCN), Business Electric Vehicle Charging Service (Schedule BEVCS), and Electric Transit Service (Schedule ETS).

constraints on the grid continue to grow. We continue to bring rate structures closer between the jurisdictions, provide rate choice, and offer rates that provide price signals to increase grid efficiency. I testified in the 23-775 Docket that we have the opportunity to become further informed by the TOU rollout in Missouri. That remains true today. Evergy Missouri Metro and Evergy Missouri West residential customers were fully transitioned to TOU default rates about 13 months ago, and peak demand and energy impact from the default TOU rates are still being evaluated. Additionally, we continue to learn how EKC and EKM customers are engaging with the three optional TOU rates and how electric vehicle ("EV") drivers are engaging in charging off-peak. Consistent with the terms of the Non-Unanimous Partial Settlement Agreement (Attachment A) in Docket No. 21-EKME-320-TAR, we completed our commitment to present future rate designs applicable to EV charging in May 2024 and will continue to focus on the "whole house" approach to EV rates while tracking the development and implementation of industry programs that utilize charging stations and/or vehicle telematics to implement EV-only rates.

Q. Is EKC proposing any new programs or rate modifications as part of its Rate Plan in this case?

A. Not at this time. We believe it is premature to propose any significant changes to the optional TOU rates approved in the 23-775 Docket; however, we will continue to evaluate the efficacy of the residential optional TOU rates and review other new programs that would complement our suite of rates/programs and provide customer value.

III. RESIDENTIAL BATTERY ENERGY STORAGE PILOT

Q. Please provide a summary of the terms of the Residential Battery Energy Storage Pilot parties agreed upon and the KCC approved in the 23-775 Docket.

A. As outlined in the Stipulation and Agreement, the KCC approved the parties' agreement that the Residential Battery Energy Storage ("RBES") Pilot[2] proposed by EKC and EKM in its direct filing should be adopted as proposed. It was further agreed that EKC and EKM would submit a final Evaluation, Measurement and Evaluation ("EM&V") report to stakeholders and to the Commission by 2Q 2027 to evaluate the success of the pilot. The reported results will be used to determine whether to move the RBES Pilot to a full-scale offer in a future rate proceeding. Also, parties agreed to a collaborate to identify parameters on deployment, reporting and EM&V, and then submit a compliance filing after that process was completed.

Q. Have EKC and EKM met with parties to collaborate on parameters of the RBES Pilot, reporting and EM&V, and was a compliance filing made?

A. EKC and EKM met with parties on July 18, 2024, to review the parameters of the Order. EKC and EKM made a compliance filing on January 14, 2025 that included the presentation reviewed with parties.

Q. Please provide a summary of the RBES Pilot.

A. The RBES Pilot will evaluate the role of battery energy storage systems in producing residential customer savings and providing services in support of EKC's electrical system. The purpose of the RBES Pilot is to evaluate the ability of a residential battery energy storage system ("BESS") to:

[2] Tariff name is Schedule RBES.

1. Provide the Company with demand response capacity to better manage grid and system peaks charging,
2. Minimize grid impacts by employing self-consuming renewable generation and minimizing exports to the grid,
3. Provide bill savings for customers on a time-of-use ("TOU") rate,
4. Manage EV charging for the benefit of the grid and the customer,
5. Provide customers with the benefits of backup power.

The RBES Pilot will advance EKC's operational knowledge of how battery energy storage systems can achieve utility and residential customer savings, while also providing additional operational benefits. The battery energy storage system will utilize various charge and discharge scenarios to evaluate which patterns produce the greatest savings impact for participating customers and the grid with the least amount of impact to daily consumption patterns and suboptimal times to export back to the grid.

The RBES Pilot will consist of up to 100 battery energy storage system installations at residential customer homes across EKC and EKM jurisdictions with the goal of an equitable customer participation in both jurisdictions, meaning a goal of 50 installations in EKC and 50 installations in EKM. We have selected an LG Home 8 Energy Storage System, which can store and provide up to 14.4 kWh of usable energy. This battery size closely aligns with a participant's load and demand response potential, and it can also be paired with solar panels.

The RBES Pilot is anticipated to collect, measure and analyze operational data from the battery systems during a three-year period (from 2024-2027) to allow an EM&V to gather results and findings from the RBES Pilot. At the conclusion of the RBES Pilot, EKC

will also evaluate the participant savings and utility benefits of the RBES Pilot and present the results to the Commission.

Q. What is the current status of the RBES Pilot?

A. EKC and EKM have contracted with three Kansas-based battery installers. EKC and EKM solicited customer interest in the RBES Pilot primarily through social media, resulting in over 450 (90 in EKM and 360 in EKC) customers completing the program application. EKC and EKM reviewed customer applications and prioritized potential participants. I will address EKC and EKM participant evaluation criteria later in my testimony.

EKC and EKM began the process of installing batteries in September 2024 and are currently completing site visits and battery installs. As of January 7, 2024, they have 40 batteries (19 in EKM and 21 in EKC) installed and fully capable to charge and discharge in accordance to the defined use case objective. Twenty-four battery installations are scheduled and are expected to be installed by February 2025. The balance of the 100 batteries is planned to be installed by March 2025.

The RBES Pilot will provide insights into distribution grid impacts, including:

- **Control Strategies:** The RBES Pilot will start with one dedicated control strategy, or energy arbitrage which will allow all batteries to utilize AI controlled algorithms for automated control across the network of participants.
- **Geographic Location**: Batteries will be installed in five different geographic locations; Wichita, Topeka, Lawrence, Shawnee and Overland Park.
- **Circuit Participants:** The RBES Pilot will target customers on the same circuits located in the same zip codes. This concentration of participants at the circuit level will

evaluate customer average interruption duration index ("CAIDI") and demand response impacts.

- **Private Long-Term Evolution ("PLTE") Connectivity:** The RBES Pilot will test the use of EKC-owned cell towers along with PLTE wireless communication technology to provide high speed, reliable connectivity.

Q. Please further elaborate on the key learning objectives EKC and EKM are expected to gain from the RBES Pilot and what will be evaluated in the EM&V.

A. Understanding the benefits for solar customers who are participating in the RBES Pilot and TOU rates is important, as well as the benefits realized for the grid. For example, through EKC and EKM, participants can coordinate their battery systems' discharge and recharge cycles to more effectively manage (or minimize) TOU rate billing charges. The EM&V will analyze participant billing consumption data and telemetry data on battery energy flows, solar system output, and home consumption of grid supplied energy to estimate the combined impact of the batteries and transition to a TOU rate on customer bills. The relevant baseline would be the solar participant's demand if they had not participated in the RBES Pilot, that is, the participant did not install a battery and did not switch to a TOU rate.

In turn, battery energy storage systems can be used to reduce the demand on the EKC and EKM electrical grid during peak periods. One of the conditions for participation by customers in the RBES Pilot, for example, is to allow EKC and EKM to utilize a portion of the stored energy in the battery to support demand-side management programs designed to reduce peak power purchases and/or manage localized distribution system constraints. Batteries have fast response times and can also be used to help maintain distribution system

power quality issues and support grid reliability. The RBES Pilot will also provide opportunities to explore customer interest in "resilience," since batteries can be used as a source of back-up power during short-term power outages.

In summary, operational benefits that will be evaluated include:

- Ability to use battery energy storage resources for peak demand reduction;
- Ability to use battery energy storage to support self-consumption of renewable energy which can minimize distribution grid impacts and increase hosting capacity of the existing distribution systems; and
- Improvement in utility grid operations attributable to use of battery energy resources to help maintain power quality and reliability of the distribution grid and to address localized distribution constraints.

Participant benefits that will be evaluated include:

- Retail bill savings from participating customers;
- Ability to integrate storage technology platform with renewable energy or smart technologies to optimize home energy use; and
- Potential to provide a source of back-up power during grid outages.

For non-participants and the grid, benefits include:

- Improved grid congestion
- Improved grid operations
- Voltage regulation support

The RBES Pilot will also provide opportunities to further explore customer behaviors and acceptance of battery energy storage technology.

Q. What technology components will be utilized to manage the battery network?

A. The RBES Pilot will feature a centralized demand response management system ("DRMS") platform that provides the capability to view and control the current state of charge in relation to current grid status for the network of batteries in the RBES Pilot. Through the DRMS, system batteries will be orchestrated based on a variety of charge and discharge scenarios designed to optimize each RBES Pilot use case (costs savings, energy management, and resiliency) in relation to the customers distributed energy resources and enable TOU rate to maximize the value back to the grid.

The RBES Pilot participants have a smart home energy control system that can be programmed with the Company's TOU rate schedules, providing real-time visibility into their battery's performance and state of charge creating a dynamic grid asset. Intelligent gateways are installed with each system providing artificial intelligence driven utility-controlled algorithms that collect real-time data to help understand and manage customer charge and discharge scenarios.

Q. How were interested residential customers selected to participate in the RBES Pilot?

A. RBES Pilot participants were selected using a multi-criterion weighted screening matrix to evaluate all battery applicants on a levelized basis. Key criteria areas included:

- Customer has solar, a home EV charger and/or smart devices;
- Location of circuit;
- Customer does not expect to move for at least two years;
- Customer's garage is attached;
- Ability to add conduit in customer's home;
- Home is all electric;

- Availability of space in customer's breaker panel; and
- Customer's willingness to be surveyed throughout the duration of the RBES Pilot.

Following evaluation of the criteria, screening site visits were completed. Those sites that pass screening and permitting are then moved to the final phase for battery installation and commissioning.

Q. Can you further elaborate on the importance of the criteria of a RBES Pilot participant having solar, a home EV charger and/or smart devices and how those are applied in the RBES Pilot?

A. The benefits of the RBES Pilot to customers will be influenced by several factors, including the customer's energy use profile, customer's rate schedule, customer's designated use case to orchestrate charge/discharge scenarios (costs savings, energy management, or resiliency), presence of customer-owned smart technology, and customer behavior and preferences. To evaluate these benefits across a range of factors, EKC and EKM sought residential participants who have a combination of the following characteristics:

- TOU rate enrollment - A battery storage device for a customer enrolled in a TOU rate would typically be charged during the off-peak period, when energy prices are lower, and discharged during on-peak periods when energy prices are higher. The energy produced by the battery when discharging would be used to supplement household consumption, reducing the amount of retail electricity purchased during peak pricing periods.
- Rooftop photovoltaic ("PV") or solar systems - Installation of a battery storage system would allow some of the solar energy to be diverted to charge the battery, when solar generation exceeds household consumption. By minimizing power

injection to the grid or reducing peak energy draw, the customer's load profile would be flattened, which could reduce the impacts of distributed generation on the existing distribution system.

- EV ownership or other smart home devices – Installation of a battery storage system may shed insights on current customer perceptions of the need/value of resiliency. For example, storage might be desirable for customers who are interested in having access to a back-up power source for critical loads during short-term outages and EV charging. In addition, EKC and EKM will also seek to identify distribution feeders on which storage systems can be utilized to improve distribution system reliability.

Q. Is there a cost to participate in the RBES Pilot?

A. The participant is assessed a program fee of $10 per month. At the conclusion of the RBES Pilot, participants may elect to continue participation in any future filed programs, purchase the battery at the current depreciable value and discontinue participation under any future program, or request removal of the battery from their premise.

Q. Lastly, please provide an update on the budget for the RBES Pilot.

A. Costs include capital and operation and maintenance ("O&M") (including EM&V). The budget for the RBES Pilot is capped at $2.5 million for deployment of up to 100 batteries. Capital costs are estimated to be $2.4 million, and O&M costs are estimated to be less than $300k. Costs are allocated between EKM and EKC based on actual installations where the batteries are deployed. As of January 29, 2025, $1.24 million ($871k in EKC and $369k in EKM) has been expended in capital and $1,600 in O&M.

Q. Does this conclude your testimony on the RBES Pilot?

A. Yes.

IV. TIME OF USE RATES STATUS AND REGULATORY ASSET REQUEST

Q. Please provide a summary of the terms of the TOU rates and regulatory asset requests parties agreed upon and the KCC approved in the 23-775 Docket.

A. As outlined in the Stipulation and Agreement, the KCC approved the parties' agreement that:

- EKC's pilot TOU rate should be converted into a permanent voluntary rate schedule.
- Changes proposed by EKC and EKM in their direct filing, including a move to a 3-period TOU rate in EKC and other changes to be consistent with the EKM TOU rate, should be adopted.
- A 2-period TOU rate would also be designed and implemented in EKC and EKM.
- EKC and EKM would report semi-annually to the KCC for three years from the date of the order in the docket showing the number of customers in each class that selected the voluntary TOU rate, the amount of savings each class experiences over each bi-annual period, and the number of customers who opted out of the TOU rates.
- The budget for marketing and education for the TOU rates would include a cap on costs of $2.5 million annually for EKC and $950k annually for EKM.
- Regulatory asset account previously established in EKM for recovering TOU education and marketing costs would be continued for the Company for recovery consideration in the next general rate case.

Q. What is EKC's request in this case?

A. EKC is requesting that the KCC allow EKC to continue to recover education and marketing costs associated with its TOU rates in a regulatory asset account as the KCC had approved and EKC had established. I will first provide an overview of the implementation of the TOU and demand rates approved in the 23-775 Docket, outreach and education efforts, and budget amounts expended relative to the cap.

Q. Have EKC and EKM complied with the S&A as you have outlined above in your testimony?

A. Yes. Following approval of the TOU and demand rates in December 2023, EKM and EKC began implementing the new and revised rates for billing and for online rate comparison. As discussed in my testimonies in the previous rate case (the 23-775 Docket), in December 2019 in EKM's Docket No. 18-KCPE-480-RTS (which preceded the Westar and KCP&L merger) following approval of the 3-period TOU and demand rates, EKM developed and implemented a robust customer research plan, marketing and education plan, and rate choice comparison tools. A similar marketing and education plan or rate choice comparison tools did not exist for EKC residential customers before the most recent rate case. Therefore, following approval in December 2023, EKC developed and implemented the plan and tools to support the 2-period and 3-period TOU rates. EKM modeled the new 2-period TOU rate in its rate compare tool and revised the tool for the changes approved for the 3-period rate. EKC customers who were taking service under the demand rate schedules of Residential Peak Efficiency and Residential Electric Vehicle were migrated to the proposed Residential Demand Service Rate, which had a similar structure to the EKM demand rate. EKC also developed a communication and outreach plan to notify these impacted customers of the changes. The 2-period, 3-period and demand rates were

approved in January 2024 and following the configuration of these rates in the billing system, the rates became active in April 2024. Rate comparison tool development and changes were complete in May 2024.

The S&A also required that EKC and EKM file a report semi-annually to the KCC with information specific to TOU enrollment – number of customers enrolled, savings experienced and number of customers who have opted out of the TOU rates. EKM and EKC filed this report on September 4, 2024, for the period January 1, 2024 to June 30, 2024 in the 23-775 Docket.

Q. Did EKC seek stakeholder feedback on its customer education and outreach plans on TOU rates?

A. Yes. This is an important aspect of the feedback loop. EKC met with stakeholders in February 2024 and August 2024 to share its education and outreach plans and materials.

Q. Please further elaborate on the status of the TOU enrollments in each jurisdiction.

A. Following the availability of the rate comparison tools in May 2024, EKC and EKM began executing their TOU outreach and education plan in summer 2024. We did so cautiously to allow gradual enrollment through the summer so as to minimize any unplanned customer bill impacts from a transition to TOU rates during higher periods of usage and to allow for the plan to have a solid foundation for the fall as efforts ramped up. Since the full launch of our campaign, EKM and EKC have seen a 31% increase in enrollments (38% increase in EKM and 26% increase in EKC) since the filing of their semi-annual report that reflected enrollments as of June 30, 2024.

For clarification, **Table 1** below summarizes the marketing name of the rate and the periods.

Table 1 – Summary of TOU Marketing Names and Periods

Marketing Name	Time Periods	Summer	Winter
Even Use	Demand rate	kW demand measured/billed during 4-8 pm	kW demand measured/billed during 4-8 pm
Summer Peak Time Based	2-period	Peak and Off Peak	Off Peak and Super Off Peak
Nights and Weekends	3-periods/all year round	Peak, Off Peak, Super Off Peak	Peak, Off Peak, Super Off Peak

Table 2 below summarizes enrollments by TOU rate:

Table 2 – Summary of TOU Customer Enrollments

	EKM			
	30-Jun-24	14-Jan-25	Increase	Percent Increase
Even Use	243	297	54	22%
Nights and Weekends	3,335	3,702	367	11%
Summer Peak Time Based	391	1,484	1,093	280%
Total	3,969	5,483	1,537	38%

	EKC			
	30-Jun-24	14-Jan-25	Increase	Percent Increase
Even Use	4,944	4,966	22	0%
Nights and Weekends	874	2,200	1,326	152%
Summer Peak Time Based	110	299	189	172%
Total	5,928	7,465	1,537	26%

	Total			
	30-Jun-24	14-Jan-25	Increase	Percent Increase
Even Use	5,187	5,263	76	1%
Nights and Weekends	4,209	5,902	1,693	04%
Summer Peak Time Based	501	1,783	1,282	256%
Total	9,897	12,948	3,051	31%

Q. The semi-annual report included cancellation and energy savings information. What did the report include with respect to those two metrics?

A. Cancellations were about evenly split between both jurisdictions, totaling eighty-seven (87). Energy charge savings were calculated to be $192,000 for EKM participating customers and $927,000 for EKC participating customers.

Q. Do EKC or EKM have any concerns with either of these metrics?

A. No, not at this point. EKM and EKC will continue to monitor the seasonality of the energy savings, but at this point we have only a snapshot of a partial year. Because a full year of data is not yet available, it would be premature to request any changes to the TOU or demand rates.

Q. Please expound on the outreach and education efforts that supported the overall 31% increase in enrollments.

A. EKC and EKM have been executing their outreach and education strategy and goals through several tactics. The strategy includes:

1. Customized messaging that focuses on seasonal transitions and customer choice; focused outreach during seasonal transitions for current TOU customers and a targeted communication approach for special customer groups;
2. Encouraging digital adoption by driving to the rate comparison tool; and
3. Focusing on customer choice and rate options.

EKM and EKC have emphasized enhancing residential customers' understanding of how their usage patterns impact their bill; how rates work, especially for at-risk groups; and available choices in the form of rate options. Each of these focus areas is further supported with tactics. **Table 3** summarizes the tactics that support each focus area:

Table 3 – Summary of Tactics Supporting Each TOU Focus Area

Focus Area	Tactic
Savings Opportunity	• Weekly Rate Coach Usage Emails • TOU High Bill Alert Communication • Personalized Online Usage Tools • Seasonal focused direct mail
Time-Based Rate Understanding	• Personalized Rate Education emails and direct mail • Seasonal pricing change modules in Rate Coach Emails • TOU Bill Insert Education • Special customer group additional education, non-digital and income-eligible direct mails
Rate Options and Selection	• Rate Education Reports (email and print) • Online Rate Comparison Tool

EKM and EKC identified three phases for their outreach plan, which included: (1) planning and preparation; (2) soft launch throughout the summer; and (3) a full launch, which began in Fall 2024 and is currently being executed by providing rate education reports to all Kansas jurisdictional customers and providing awareness and targeted messaging. Awareness and targeted messaging are accomplished through several methods including emails, bill inserts, digital educational videos, paid search, digital ads and videos, social media, EKC homepage, and working with partners to also share information. EKC also created a toolkit of TOU educational materials that stakeholders could easily use in their communication channels. This is not an exhaustive list but illustrates the comprehensive thought leadership that EKC and EKM have put forth on TOU outreach and education.

Thus far, rate education reports have been the most effective tactic in the education and outreach plan. Rate education reports are a 1:1 printed touchpoint with all residential

jurisdictional customers and the reports are mailed directly to the customer's home. Following the start of our full launch of our education campaign and sending of the rate education report in September 2024, nearly 1300 customers enrolled in TOU rates. EKC and EKM plan to send the rate education reports twice per year.

Q. The Nights and Weekend and Summer Peak Time Based Plans have shown significant enrollments, but has there been limited new enrollments in the Even Use plan. Why is that?

A. The Even Use Plan, which is the demand rate plan, is not currently supported by the rate comparison tool. Therefore, customers can only compare the standard rate alongside the Nights and Weekend and Summer Peak Time Based Plans – but not the Even Use Plan. The software provider for the rate comparison tool anticipates that it will be able to support a demand rate structure in 2026. Until then, EKC and EKM would not anticipate much increase in enrollment in the Even Use Plan but will continue to provide education and information regarding the plan.

Q. House Bill 2527 revised language in the Kansas net metering and easy connection act to allow net metering customers to enroll in a TOU rate beyond the Even Use Plan (demand rate). Have EKM and EKC completed their billing effort to comply with the legislative changes?

A. Yes. Net metering customers in EKC jurisdiction can now enroll in the Nights and Weekend and Summer Peak Time Based Plans.

Q. What is the status of the annual costs expended thus far for TOU education and outreach? How does that compare to the cap established in the S&A?

A. EKC and EKM are prudently managing their TOU outreach and education budget and are deferring costs in accordance with the S&A. The KCC-approved budget for marketing and education for the TOU rates would include a cap on costs of $2.5 million annually for EKC and $950k annually for EKM. Both jurisdictions are spending well below the cap. As provided for in CS-135 (Amortization of TOU Marketing and Education Regulatory Asset, Accounts 182842, 407300), EKC expenditures through October 31, 2024, and projected costs through March 31, 2025 are $1,753,714. Not only is EKC well under the annual cap but the expenditures are for a 15-month period.

Q. Earlier you stated that EKC is requesting that the KCC continue to allow it to recover TOU education and marketing costs in a regulatory asset account for future rate case consideration. Why is that being requested if EKC has implemented the TOU and demand rates and has launched an outreach and education plan?

A. Educating customers on how their usage impacts their bill, how rates vary with seasons, and how rate choice and options can help a customer be more successful in saving on their bill or reducing their impact to the grid is a continuous effort by the electric utility. A TOU education and marketing plan is not a "one and done" effort. I offer several points that demonstrate the value of outreach and education and support EKC's request to continue deferring education and marketing costs:

- A key tactic used to reach customers is the rate education report. It is a proven tactic for education and TOU enrollment in the industry, and for EKC and EKM. For example, following the rate modeling required to enable support and extend these reports to EKC, over 720,000 printed RERs were mailed, and more than 540,000 email RERs were sent to eligible residential customers across EKC and EKM in October

2024. These communications informed customers about their rate plan options and provided detailed, personalized cost comparisons. Customer email engagement was particularly high, with an impressive 55% open rate and over a 2% click-through rate. This allowed customers to further compare their rate plan options or directly change their plan digitally through the EKC website or mobile app. Following the distribution of these RERs, in conjunction with other EKC rate plan marketing communications, more than 3,100 optional rate plan enrollments occurred in Q4 2024. Notably, 50% of these enrollments originated from EKC customers, who have recently gained access to these digital rate tools.

- The rate comparison tool only recently became available to EKC customers in 2024. Following its launch, tool impressions from residential EKC and EKM customers surged by 569% from May to June 2024. Additionally, after sending the Rate Education Reports ("RERs") in October 2024, we observed a month-over-month growth of 255%, highlighting a significant increase in customer interest both immediately after the tool's availability and in response to the RER and other Evergy rate plan communications. Allowing the Company to continue deferring education and marketing costs will help sustain the surge in customer engagement that followed our 2024 launch of the rate comparison tool in the EKC service area.
- Per the settlement in the 23-775 Docket, EKM will be able to continue to defer the equivalent outreach and education costs until its next rate case filing. It makes no sense to allow one jurisdiction (EKM) to have that ability while the other jurisdiction (EKC) does not. EKC is still making significant progress educating its customers about TOU, and that progress should not be inhibited based only on the timing of rate cases.

- EKC has been prudently managing the budget and is 30 percent below the cap.
- It is imperative that EKC be allowed to defer the costs to continue to educate customers on how to better manage their usage behavior to reduce their usage impact during peak times, regardless of whether they enroll in a TOU rate.
- The KCC will still have the opportunity to review the prudency of the costs EKC defers in the regulatory asset account.

Given the value of the education and outreach efforts described herein, EKC requests that the KCC continue to allow EKC to track related costs in a regulatory asset for future recovery consideration.

Q. Does this conclude your testimony on the TOU regulatory asset?

A. Yes.

V. STAY CONNECTED PILOT PROGRAM

Q. Please provide an overview of the Stay Connected Pilot program.

A. The Stay Connected Pilot ("SCP") program is a three-year pilot designed to keep income-eligible EKC residents current on their account by relieving some of their financial burden. By offering monthly bill credits, the program helps customers avoid getting into a crisis situation by offering more manageable monthly bills. To enroll, residential customers must be current on their account or be enrolled in a payment plan. Additionally, in 2025, EKC will conduct outreach to help promote the Low-Income Energy Assistance Program ("LIEAP") to customers currently qualifying for Supplemental Nutrition Assistance Program ("SNAP") benefits. The intent is to help customers who would automatically be eligible for LIEAP due to their SNAP eligibility become aware of LIEAP, understand the program, and receive assistance in completing the application.

Q. Does EKC have experience administering payment assistance programs similar to the SCP program?

A. Yes. The SCP program is modeled on our Economic Relief Pilot Program ("ERPP") in Missouri[3], which has successfully provided assistance to low-income customers in that state for longer than a decade. The MPSC approved the ERPP 15 years ago and the program has since expanded. For the SCP program, EKC will leverage LIEAP programs by encouraging eligible customers to secure LIEAP and other resources prior to enrolling in SCP program. Customers who received or are receiving LIEAP benefits will be eligible for EKC's SCP program. As explained before, EKC is engaging in an effort in 2025 to expand awareness of LIEAP by promoting it to SNAP-eligible customers who are currently not receiving LIEAP. This will happen prior to the rollout of the new SCP program, helping to ensure LIEAP benefits are maximized prior to enrollment in SCP program. Due to the low-income requirements of SNAP, any customer currently in that program would be eligible to apply for LIEAP.

Q. How many households within the EKC service area would you anticipate enrolling in the SCP program?

A. Based on the number of participants in the Missouri ERPP and the amount of funding available, we estimate up to 2,500 customers could be enrolled at any given time in the SCP program.

[3] *See* Order Approving Non-Unanimous S&A, *In the Matter of the Tariff Filing of KCP&L Greater Missouri Operations Company, to Implement a General Rate Increase for Retail Electric Service Provided to Customers in its Missouri Service Areas it formerly served as Aquila Networks-MPS and Aquila Networks L&P,* Case No. ER-2009-0090 (Tariff No. JE-2009-0913).

Q. Summarize the program's eligibility requirements.

A. In order to be eligible for the SCP program, the customer's income must be within 250% of the Federal Poverty Guidelines ("FPL"). The customer also must have an open residential account with an active meter and be listed as the person financially responsible for the account. Additionally, the account must either be current or subject to an active pay arrangement.

Q. Are these eligibility requirements ongoing?

A. Yes. Customers must meet the income-eligibility requirements, and their account must remain current in order to continue participating in the SCP program.

Q. Are there other program participation limitations?

A. Yes. Once enrolled, eligible customers can remain in the program for up to 24 consecutive months. Thereafter, the customer will be removed from the program. If the customer wishes to re-enroll (and the program is still available), the customer can re-apply.

Q. How will the monthly bill credit be calculated under the SCP program?

A. The monthly bill credit will be calculated based on the customer's average monthly bill during the preceding 12-month period and estimated income level. The amount of the credit will be equal to the amount of the customer's average monthly bill during that period, rounded up to the nearest dollar. The maximum amount of the credit will be $100 per month. The SCP program credit may generate a credit balance on the customer's account in certain months. In such cases, the credit balance will be applied to the next month's bill. Under no circumstances will the credit be refunded or redeemable in cash.

Q. Please discuss the overarching goals and objectives of the SCP program.

A. The SCP program is aimed at helping income-eligible customers stay connected on their accounts by relieving some of their financial burden while reducing overall costs to all EKC customers. The program will assist low-income customers by proactively helping them stay current on their payment obligations, by reducing their threat of disconnection, and by linking them to other payment assistance resources.

Q. Explain the basis for EKC's "dual-benefits" hypothesis.

ERPP in Missouri shows that approximately 15% of participating customers enter into threat of disconnect whereas the national average of those struggling to pay their utilities is between 25% - 30%. The process of promoting LIEAP proactively and in 2025 to SNAP recipients, along with the SCP program, allows EKC to more holistically assist customers in the low-income bracket and help them avoid getting into a crisis payment situation.

Q. Will EKC partner with outside groups to help promote or administer the SCP program?

A. Yes. We will partner with Promise Pay to assist with SNAP eligibility identification, and LIEAP cross promotion. We also will partner with The Salvation Army to assist with income eligibility determinations and credit placement for the SCP program.

Q. Please describe the promotion and outreach plan for the SCP program.

A. EKC will publish program information and application materials online and distribute these materials at outreach events via agency partners. EKC will also utilize Evergy Connect-Wichita specialists to conduct on-site and virtual appointments for application completion and to connect customers with the services offered by Promise Pay and The Salvation Army.

Q. What is the estimated annual cost of the SCP program?

A. Estimated annual program costs for EKC are $1.6M.

Q. How will program costs be funded?

A. We recommend program costs be funded 100% by rate revenues. These costs would be socialized among all residential customers.

Q. What is the estimated timeline for program development?

A. Our estimated timeline is as follows:

Develop program	August - December 2024
Finalize SCP program parameters and details	December 2024
Submit program in EKC rate case failing	January 2025
Launch pre-pilot LIEAP / SNAP cross promotion	January - February 2025
Launch SCP program	2026

Q. Please describe the stakeholder engagement plan for the program.

A. EKC would promote the SCP program directly to eligible customers through its customer walk-in facility, Evergy Connect-Wichita, and during customer events with income–eligible customers. EKC's customer affairs team would inform key social service providers and agencies of the program.

Q. Please identify key performance indicators for evaluating the success of the SCP program.

A. EKC would assess the SPC program through the following Key Performance Indicators:

- Lowered threat of disconnections of participating customers
- Lowered disconnections of participating customers
- Linkages to other bill payment support such as LIEAP
- Increased support for more income-eligible customers
- Customer satisfaction

Q. Describe EKC's philosophy on customer support and access to payment resources.

A. EKC's Customer Affairs and Connect teams work extensively in the community to expand awareness of utility assistance programming, energy savings tools and other social services. This is done through face-to-face assistance and a goal to support customers holistically by layering resources and services. In 2023, our teams helped 67,000 customers secure approximately $42M in bill payment assistance territory wide. This work was done at both Evergy Connect facilities and by participating in more than 300 community and social service events targeting low-moderate income households. I would also emphasize that EKC put in place two customer walk-in facilities, one in Kansas City, Missouri, and one in Wichita, Kansas. These facilities are critical to assisting customers not easily able to work with technology or without access to technology. At these facilities, trained teams provide an overview of all available resources, assist with applications and bring additional resources on site such as affordable housing, job/career opportunities, food insecurity resources and other social services. Additionally, EKC partnered with Mid-America Assistance Coalition to provide 'Evergy Cares', a new program to provide small bill payment assistance to EKC customers when LIEAP is not available.

Q. What is the Connect facility in Wichita?

A. In November of 2022 EKC opened its second customer walk-in facility, Evergy Connect –Wichita. This facility is critical to assisting customers not easily able to work with technology or without access to technology. At Evergy Connect-Wichita, a trained team provides an overview of all available resources, assists with applications and brings additional resources on site such as affordable housing, job/career opportunities, food insecurity resources and other social services. The new facility was based on EKC's first

Connect facility in Kansas City. In 2023, Evergy Connect-Wichita helped approximately 10,000 customers with bill assistance, energy usage and savings tools, as well as holding resource events.

Q. Why is EKC committed to the communities it serves?

A. EKC believes that healthy communities are beneficial for our customers by supporting residential and business expansion and enabling economic development opportunities that spread costs and maintain affordability. As a company headquartered in our region, with all assets permanently placed here, we understand the vital importance of community support. EKC also provides opportunities for employees to be engaged in civic and charitable activities, programs and boards, which enhance regional vitality and help us attract and retain talented employees who live in our communities and serve our customers every day. In 2023, the Evergy companies provided $6.7M in community support focusing on community vitality and environmental leadership. Additionally, Evergy's employees dedicated 18,000 hours in volunteerism.

Q. Does EKC have a defined community investments strategy?

A. Yes. EKC's Community Impact Strategy can be found at https://www.evergy.com/community/community-involvement and its mission is to empower a better future for our customers and communities. Making a positive impact in the communities we call home is a foundational component of our business. EKC's key pillars of investment are community, vitality, and environmental leadership. This support is leveraged by employees actively engaged in the community through leadership and employee giving campaigns.

Q. Would you anticipate requesting the KCC approve the SCP program for EKM customers at a future point?

A. Yes, at the appropriate time, EKM would anticipate requesting an SCP program for EKM customers. EKM will evaluate the outcome in this current case and make any appropriate adjustments to the program.

Q. Does this conclude your testimony on the Stay Connected Pilot program?

A. Yes.

VI. REASONABLENESS OF RATE INCREASE APPLIED TRANSPORTATION ELECTRIFICATION RATES

Q. What is the Company's rationale for the proposed increases to the transportation electrification rates?

A. The transportation electrification rates I refer to include Public Electric Vehicle Charging Service ("Schedule CCN"), Business Electric Vehicle Charging Service ("Schedule BEVCS"), and Electric Transit Service ("Schedule ETS"). Schedule CCN is applicable to the energy provided to charge EVs at EKC-owned public charging stations, which is referred to as the Clean Charge Network. Clean Charge Network charging stations are installed at EKC and host site locations. The Company has tied the proposed rate increase in Schedule CCN to the proposed Residential class rate increase. This tie was made on the basis that the Clean Charge Network is primarily used for personal vehicles and is particularly vital for EV drivers who cannot charge their vehicle where they live.

The Company has tied the rate increases in Schedule BEVCS and Schedule ETS to the Large General Service ("LGS") class rate increase on the basis that the LGS rate schedule served as the foundation for Schedules BEVCS and ETS rate designs (Lutz testimony in Case 21-EMKE-320-TAR.

The proposed rate increases reflect EKC'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. In addition, this gradual approach to rate adjustments is advisable given the high rate of ongoing dramatic growth within the EV rate class, as discussed herein.

Q. In what ways might a larger increase to the rate in Schedule CCN be detrimental?

A. When considering the potential impacts of rate increase to Schedule CCN, it is helpful to bear in mind the variety of user personas that use the Clean Charge Network, including:

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

Within this context, EKC expects a large rate increase to Schedule CCN to have two main impacts:

1) Net Decrease in EKC Revenue contributed from Schedule CCN

Given the variety of users, Clean Charge Network demand will exhibit some amount of price elasticity. As such, a large rate increase is likely to significantly lower overall usage. For example, if the rate supporting the Clean Charge Network increased 50% overnight, then EV drivers would seek out less expensive stations and/or shift more of their charging to home *if that is an option*.

This last point is critical: Absent sufficient lower-cost alternatives, EV drivers who do not have access to charging at home (e.g. apartment dwellers) bear the brunt of rate increases to Schedule CCN.

2) Decrease in EV Adoption / Population

A large increase in the cost to use the Clean Charge Network 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 lead to a decrease in EV sales. Within the former group of current Clean Charge Network customers, a very large increase and associated fear of future shock-increases could motivate customers to go back to internal combustion vehicles, which would shift benefits from electric utility customers back to the oil industry.

Q. In what ways might a large increase to the rates within Schedules BEVCS and ETS be detrimental?

A. In particular, participation in Schedule BEVCS is in its nascency and energy sales are significantly increasing year over year. Specifically:

Rate Schedule	Test Year Minus One Year (kWh)	Test Year (kWh)	Test Year Plus One Year (Projected) (kWh)	% Increase (Test Year VS Prior)	% Increase (Test Year VS Subsequent Year, Estimated)
BEVCS	3,601,030	4,389,043	6,621,475	21%	46%
ETS	377,734	410,978	377,332		

Given the newness, limited enrollment, and extremely modest usage of these rates, EKC believes significant price increases would be 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 EKC is striving to shape consumer

behavior via time-of-use rates, significant rate increases could have the opposite effect of drawing customers towards traditional rates (e.g. LGS) rather than utilizing time-of-use rates for EV charging (e.g. by choosing LGS over BEVCS or ETS).

Q. How has EV adoption progressed within EKC?

A. The 7-year compound annual growth rate ("CAGR") for the EV population in EKC from 2018 through 2024 is 37%. More recently, the EV population in EKC grew from 3,030 to 7,610 during the three-year period 2022-2024. This annualized rate of growth (36%) mirrors the longer-term trend.

Q. Has Clean Charge Network utilization grown alongside EV adoption?

A. Yes. Clean Charge Network usage during the test year was 43% higher than the previous twelve months. Looking forward, based on the six-month period following the test year (i.e. July 2024 through year-end), Evergy projects that Clean Charge Network utilization will increase nearly 60% during 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 Clean Charge Network 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 canvass of pertinent works to empirically identify the factors affecting consumers' intention to adopt EVs.[4] This study, which included examination of 537 publications, found that the most cited barriers to

[4] www.sciencedirect.com/science/article/pii/S2773153724000057

adoption of EVs were found to be the lack of charging station availability and their limited driving range.

Q. How much EV adoption has resulted from the Clean Charge Network?

A. While the University of Texas research supports the assertion that EV adoption is influenced by the Clean Charge Network, the question remains … how much. EKC believes it is reasonable to assume Clean Charge Network attribution is about 5% within EKC. That is to say, the CCN is a decisive factor in five 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 Clean Charge Network.

Consider:

- Evergy estimates there were nearly 7,600 EVs within EKC as of year-end 2024.
- On average, each EV is assumed to consume approximately 3,400 kWh per year
- $0.10 of revenue per kWh.
- Attribution rate of 5%.

Given the above, the estimated incremental revenue from EVs where the Clean Charge Network was a decisive factor in the owner's purchase decision is approximately $116k. Again, this represents revenue *that would not exist absent the Clean Charge Network*.

Q. Does EV adoption benefit all customers?

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.[5] On a forward-looking basis, California's Public Advocates Office ("CPAO") and the California Public Utility Commission separately concluded that electrification *would* result in downward pressure on residential rates for California's three largest investor-owned utilities. Once again, this result is inclusive of the California IOU's considerable EV-related program costs.

Q. Should the KCC approve EKC's approach and recommended increases for the three transportation electrification rate schedules?

A. Yes. EKC's recommended rate increases balance additional revenue requirements with the need to avoid excessive cost increases that could decelerate EV adoption to the financial detriment of all EKC customers. Rather than proposing shock-increases that have the potential to "kill EV adoption in the crib", EKC recognizes the value EVs provide to all utility customers and encourages broad stakeholder collaboration on cost effective programs that encourage EV adoption while minimizing the cost to serve.

Q. Does this conclude your testimony on the reasonableness of the rate increases for the transportation electrification rate schedules?

A. Yes.

[5] www.synapse-energy.com/sites/default/files/Electric%20Vehicles%20Are%20Driving%20Rates%20Down%20for%20All%20Customer%20Update%20Jan%202024%2021-032.pdfhttps://www.publicadvocates.cpuc.ca.gov/press-room/reports-and-analyses/distribution-grid-electrification-model-findings

VII. CONCLUSION

Q. Please summarize your recommendations.

A. I recommend the Commission adopt the following:

- Allow EKC to continue to recover education and marketing costs associated with its TOU rates in a regulatory asset account as the KCC had previously approved and EKC had established.
- Approve the proposed SCP program where program costs are funded 100% by rate revenues and socialized among all residential customers. The annual requested budget for the SCP program in EKC is $1.6M.
- Approve EKC's recommendation to tie the proposed rate increase in Schedule CCN to the proposed Residential class rate increase and tie the proposed rate increase in Schedule BEVCS and Schedule ETS to the LGS class rate increase.

Q. Does this conclude your testimony?

A. Yes.

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

VERIFICATION

Kimberly Winslow, being duly sworn upon her oath deposes and states that she is the Sr Director Energy Solutions, 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.

Kimberly Winslow

Subscribed and sworn to before me this 31st day of January 2025.

Notary Public

My Appointment Expires May 30, 2026

NOTARY PUBLIC - State of Kansas
LESLIE R. WINES
MY APPT. EXPIRES 5/20/2026