

BEFORE THE STATE CORPORATION COMMISSION

OF THE STATE OF KANSAS

IN THE MATTER OF THE APPLICATION]
OF EVERGY METRO, INC., EVERGY]
KANSAS CENTRAL, INC., AND EVERGY] KCC DOCKET NO. 25-EKCE-169-TAR
KANSAS SOUTH, INC., FOR APPROVAL]
OF ITS PHASE 2 TRANSPORTATION]
ELECTRICIFICATION PORTFOLIO.]

DIRECT TESTIMONY

JOSH FRANTZ

ON BEHALF OF

THE CITIZENS' UTILITY RATEPAYER BOARD

JANUARY 23, 2025

1 **I. Statement of Qualifications**

2 **Q. Please state your name, employer, and business address.**

3 A. My name is Joshua (Josh) Frantz. I am employed by the Citizens' Utility Ratepayer Board
4 (CURB) as a Senior Regulatory Analyst. My business address is 1500 SW Arrowhead
5 Road, Topeka, Kansas 66604.

6
7 **Q. Please describe your educational background and qualifications.**

8 A. I earned a Master of Business Administration degree from Washburn University of Topeka,
9 Kansas. I also earned a Bachelor of Business Administration degree from Washburn
10 University. My undergraduate majors were finance, marketing, and management.

11
12 **Q. Please describe your professional background and qualifications.**

13 A. From August 2015 through April 2019, I was employed by the Kansas Corporation
14 Commission (KCC or "Commission"). I began my employment with the KCC in the
15 Utilities division as a Senior Research Economist and was promoted to Managing Rate
16 Analyst.

17 Since April 2019, I have served in my current position as Senior Regulatory Analyst
18 with CURB.

19
20 **Q. Have you previously testified before the Commission?**

21 A. Yes. Over the course of my employment with CURB, I have provided testimony in several

1 proceedings before the Commission. During my prior employment as a member of KCC
2 Staff, I also provided testimony in proceedings before the Commission and submitted
3 Report and Recommendations for the Commission’s consideration. A list of my prior
4 Commission filings is available, upon request.

5
6 **II. Summary of Testimony**

7 **Q. What is the purpose of your testimony?**

8 A. My testimony covers the *Application for Approval of its Phase 2 Transportation*
9 *Electrification Portfolio* (“Application”) filed by Evergy Metro, Inc. (“Evergy Kansas
10 Metro”) and Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. (together, “Evergy
11 Kansas Central”) (collectively, “Evergy” or “Company”) in this docket on September 30,
12 2024.

13
14 **III. Background**

15 **Q. Please provide a brief description of Evergy’s Application.**

16 A. Evergy is requesting approval of its Phase 2 Transportation Electrification (“TE”)
17 portfolio. TE refers to the transition from vehicles powered by an internal combustion
18 engine (“ICE”) to electric vehicles (“EV”) powered partially or fully by electricity.
19 Evergy’s proposal consists of two programs: the Fleet Advisory Services (“FAS”) Program
20 and Residential Managed Charging (“RMC”) Pilot.

1 **IV. Evaluation**

2 **a. Fleet Advisory Services Program**

3 **Q. Please describe the FAS Program.**

4 A. In this context, “fleet” refers to a collection of vehicles owned or leased by a business or
5 organization for operational use. Compared to ICE fleet operators, EV fleet operators face
6 the added complexity of managing vehicle charging on-site. Evergy states that the
7 objectives of the FAS Program are to enable informed fleet management choices, facilitate
8 grid-friendly EV transition planning for fleet operators, and establish Evergy as a trusted
9 energy advisor for TE.¹ The FAS Program will focus on providing education and technical
10 assistance from the utility perspective and developing customer charging plans that will
11 meet fleet needs while avoiding capacity upgrades and minimizing energy supply costs.²

12 The FAS Program has three levels, based on customers’ varying stages of fleet
13 development: Level 1: Introductory Fleet Assessment; Level 2: Enhanced Fleet
14 Electrification Planning; and Level 3: Comprehensive Fleet Electrification Assessment.³

15 The FAS Program will be available to all fleets in Evergy’s Kansas service
16 territories, but priority in outreach would be given to schools, transit agencies, and
17 small/medium business fleets.⁴

¹ *Evergy Kansas Metro and Evergy Kansas Central Application for Approval of its Phase 2 Transportation Electrification Portfolio*, ¶ 10 (Sep. 30, 2024) (Application).

² Application, ¶ 11.

³ Application, ¶ 12.

⁴ Application, Attachment 1 §1.3.

1 **Q. What are Evergy’s expected participation levels and budgets for the FAS Program?**

2 A. Evergy expects to serve 60 EV fleets over the initial five-year FAS Program term.⁵

3 The program will be offered without a fee to participate.⁶ The five-year budgets for
4 the FAS Program are \$772,000 for Kansas Central and \$998,000 for Kansas Metro.⁷ The
5 FAS Program budget consists of the following subcategories: program implementation;
6 customer outreach; and measurement and reporting.⁸

7 Evergy proposes to record the program costs for the FAS Program to a regulatory
8 asset⁹ for recovery through the general rate case process.¹⁰

9
10 **Q. What benefits does the FAS Program provide?**

11 A. The FAS program is designed to avoid capacity upgrades and minimize energy supply
12 costs for the utility by “right-sizing” a customer EV fleet and charging plans. CURB sees
13 particular public benefit in this service for schools or other public agencies.

14
15 **Q. Are utilities expected to offer a certain level of service?**

16 A. Yes, 66-101b requires electric public utilities to “furnish reasonably efficient and sufficient
17 service” for the use of products or services the utility provides.

⁵ Application, Attachment 1 §4.2.6.

⁶ Application, ¶ 11.

⁷ Application, Attachment 1 §4.2.5.

⁸ Evergy response to data request KCC-10.

⁹ Specifically, the regulatory asset approved in Docket No. 21-EKME-320-TAR.

¹⁰ Application, ¶ 24.

1 **Q. Is the service provided by the FAS Program relevant to this mandate for utilities?**

2 A. Yes, I believe so. One of the FAS Program's objectives is to enable informed fleet
3 management choices. For efficiency, Evergy has stratified its advisory process into three
4 levels based upon different stages of customer interest and fleet development. I believe the
5 FAS Program is designed in a manner that will provide reasonably sufficient and efficient
6 support and education to customers interested in electrifying their business fleets.

7 Although third-party fleet advisory services are available,¹¹ if a customer inquired
8 with Evergy about fleet electrification and was simply advised by Evergy to hire an
9 advisory firm, that would be a missed opportunity for Evergy to leverage its expertise on
10 infrastructure planning to enhance the efficiency of that customer's energy usage and
11 allocation of resources.

12 Furthermore, another FAS Program objective is to facilitate grid-friendly EV
13 transition planning for fleet operators. I do not believe any third-party installer or advisory
14 firm has equivalent knowledge of the grid to comparably address this objective.

15
16 **Q. Is Evergy partnered with any vehicle brand, automotive dealership, or charging equipment
17 provider for the FAS Program?**

18 A. No, Evergy is not partnered with any vehicle, dealership, or charging equipment provider.¹²
19 My initial concern regarding the FAS Program was the potential for Evergy to influence
20 consumer behavior in external competitive markets. Evergy's response to CURB-8,

¹¹ See Evergy response to data request KCC-8.

¹² Evergy response to data request CURB-8.

1 attached to my testimony, sufficiently addresses my concern that Evergy’s advisory role
2 will maintain brand-neutrality and customer autonomy (e.g., if participants have specific
3 preferences, such as loyalty to American-made products, these preferences will be
4 respected and incorporated).¹³

5
6 **Q. What is your recommendation regarding the FAS Program?**

7 A. I recommend the Commission approve the FAS Program as proposed by Evergy.

8
9 **b. RMC Residential Managed Charging Pilot Program**

10 **Q. Please describe the RMC Pilot.**

11 A. Eligible customers for the RMC Pilot utilize Level 2 (240-volt) EV charging at home.¹⁴
12 The RMC Pilot is intended to optimize the charging patterns of EV drivers who charge at
13 home, gather information about customer preferences related to managed charging, and
14 quantify the load shaping impacts and costs of two different approaches (passive vs. active
15 managed charging) on different customer groups.¹⁵

16 The passive managed charging (“PMC”) approach provides EV drivers with
17 educational/motivational communications to shape their home charging behaviors.¹⁶

18 Customers may opt-out at any time if they do not wish to continue participating.¹⁷

¹³ Evergy response to data request CURB-8.

¹⁴ Application, Attachment 1 Appendix E pp. 63, 67.

¹⁵ Application, ¶ 19.

¹⁶ Application, ¶ 19.

¹⁷ Application, ¶ 19.

1 The Active Managed Charging (“AMC”) approach requires customer enrollment.
2 Customers can withdraw from AMC at any time,¹⁸ but if a customer withdraws they will
3 not be eligible to re-enroll.¹⁹

4 Under the AMC approach Evergy will initiate EV charging at the time of its
5 choosing, subject to the customer-defined “preferred charging schedule” for the vehicle
6 charge level (e.g. 80% charge by 6:00 AM).²⁰ Evergy will make AMC decisions based on
7 supply cost minimization while avoiding unwanted bill impacts for participants on time-
8 varying rates.²¹

9
10 **Q. What is the financial incentive structure for the AMC approach?**

11 A. The financial incentives to encourage AMC participation are a \$50 enrollment bonus and
12 \$10 monthly so long as the customer charges at home at least once per month and does not
13 override Evergy’s charging schedule more than twice per month.²²

14 Evergy determined the AMC incentives by reviewing the range of incentives used
15 in similar utility-managed charging programs across the country and selecting a value
16 deemed adequate to secure the participation level needed for pilot learnings.²³

17 Evergy will review AMC progress and consider incentive updates on a quarterly
18 basis, but Evergy does not expect to make changes that would increase the total pilot budget

¹⁸ Evergy response to data request CURB-4

¹⁹ Evergy response to data request CURB-3.

²⁰ Application, Attachment 1 Appendix E pp. 63, 67.

²¹ Application, Attachment 1 §4.1.1.

²² Application, Attachment 1 Table 5.

²³ Evergy response to data request KCC-7.

1 or affect the targeted learnings.²⁴ Any adjustment to incentives and Evergy's supporting
2 rationale will be shared with the Commission and intervenors in the annual report.²⁵
3 Participants will be provided notice of any such changes through their noted preferred
4 communication channels.

5
6 **Q. Please describe how a customer sets their "preferred charging schedule."**

7 A. AMC participants will use an app to define their charging preferences with "need by time"
8 (in 30-minute increments) and target battery percentage (in 5% increments) being the two
9 primary inputs.²⁶

10 Drivers can choose to reset their charging schedule on any given day as many times
11 as they want, and each change goes into effect within 15 minutes.²⁷ Also, drivers can opt
12 out of the schedule by selecting "Charge Now" in the app,²⁸ with the caveat that opting out
13 of the charging schedule more than twice in a month will nullify the incentive for that
14 month.

15
16 **Q. What are Evergy's expected participation levels and budgets for the RMC Pilot?**

17 A. Evergy expects approximately 21,000 customers to receive PMC communications and
18 2,000 participants in AMC (total AMC enrollment is capped at 2,000).²⁹ The three-year

²⁴ Evergy response to data request CURB-7.

²⁵ Evergy response to data request CURB-7.

²⁶ Evergy response to data request CURB-6.

²⁷ Evergy response to data request CURB-6.

²⁸ Evergy response to data request CURB-6.

²⁹ Application, Attachment 1 Appendix A p. 38.

1 budgets for the RMC Pilot are \$1.677M for Kansas Central and \$3.163M for Kansas
2 Metro.³⁰ The RMC Pilot budget consists of the following subcategories: customer
3 incentives; implementation; customer education and recruitment; and EM&V and
4 reporting.³¹ The most costly RMC budget component, by far, is the AMC platform.³²

5 Evergy proposes to record the program costs for the RMC Pilot to a regulatory
6 asset³³ for recovery through the general rate case process.³⁴

7
8 **Q. What are the benefits of the RMC Pilot?**

9 A. The proposed RMC Pilot will encourage and promote off-peak home EV charging which
10 improves alignment with lower cost and lower emission generation.

11
12 **Q. What is your recommendation regarding the RMC Pilot?**

13 A. I recommend the Commission approve the RMC Pilot as proposed by Evergy.

14
15 **VI. Conclusion**

16 **Q. Please summarize your comments.**

17 A. I recommend the Commission approve the FAS Program as proposed by Evergy. I believe
18 the program is designed to provide an efficient and sufficient level of educational/advisory

³⁰ Application, Attachment 1 Table 6.

³¹ Evergy response to data request KCC-10.

³² See Evergy response to data request KCC-10.

³³ Specifically, the regulatory asset approved in Docket No. 21-EKME-320-TAR.

³⁴ Application, ¶ 24.

1 service to customers interested in electrifying their vehicle fleets. All customers can benefit
2 from grid-friendly EV transition planning for fleet operators, and I believe it is within
3 Evergy's scope to advise customers on matters of grid efficiency for significant EV
4 charging loads.

5 I also recommend the Commission approve the RMC Pilot as proposed by Evergy.
6 The RMC Pilot is designed to encourage and promote shifting home EV charging away
7 from peak periods, which can benefit all customers. The PMC approach is
8 educational/motivational and requires no action on the customer's behalf, but customers
9 can easily opt out if uninterested. Under the AMC approach, there are no significant
10 commitments required on the customer's behalf to enroll, and customers can withdraw at
11 any time. AMC participants always have the option to opt out of their preferred schedule
12 and can also easily adjust their preferred charging schedule via an app. Evergy will have
13 some flexibility to adjust the incentive structure (within budget) if it appears customers are
14 being over- or under-compensated to achieve program objectives.

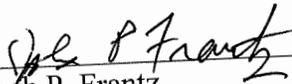
15
16 **Q. Does this conclude your testimony?**

17 **A.** Yes, thank you.

VERIFICATION

STATE OF KANSAS)
)
COUNTY OF SHAWNEE) ss:

I, Josh P. Frantz, of lawful age and being first duly sworn upon my oath, state that I am a Senior Regulatory Analyst for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.



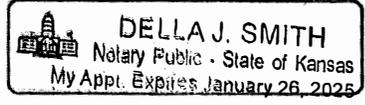
Josh P. Frantz

SUBSCRIBED AND SWORN to before me this 23rd day of January, 2025



Notary Public

My Commission expires: 01-26-2025.



APPENDIX
REFERENCED DATA REQUEST RESPONSES

CURB-3

CURB-4

CURB-6

CURB-7

CURB-8

KCC-7

KCC-8

KCC-10*

* Confidential attachments not provided



Evergy Kansas Central
Case Name: 2024 Evergy KS Central Transportation Electrification
Case Number: 25-EKCE-169-TAR

Requestor Astrab Joseph -
Response Provided January 16, 2025

Question:CURB-3

Because of the testimony being due on January 23, 2025, will you please expedite the responses to CURB 3-8.

If a customer opts out of AMC, will they be eligible to re-enroll? If yes, does Evergy specify the \$50 enrollment incentive is for first enrollment only?

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

When speaking of opt-outs in the context of AMC, we are referring to overriding program controls for a specific charging session. This is different from customers electing to end program participation entirely, which we refer to as program withdrawal.

If a customer withdraws from the AMC pilot, they will not be eligible to re-enroll.

Information provided by: Wendy Marine, Lead Product Manager - Electrification

Attachment(s):



Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Kansas Central
Case Name: 2024 Evergy KS Central Transportation Electrification
Case Number: 25-EKCE-169-TAR

Requestor Astrab Joseph -
Response Provided January 16, 2025

Question:CURB-4

Because of the testimony being due on January 23, 2025, will you please expedite the responses to CURB 3-8.

AMC is limited to 2,000 customers, but participants can opt-out at any time.

- a) Is the 2,000-customer limit relative to active participants or total enrollments?
- b) Is there a minimum enrollment duration or other participation qualifier required to receive the \$50 enrollment incentive?

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

As defined in Question CURB-3, opt-outs in the context of AMC refers to overriding program controls for a specific charging session. This is different from customers electing to end program participation entirely, which we refer to as program withdrawal. Participants can withdraw at any time.

- a) The 2,000 customer limit is relative to Total Enrollments
- b) Currently, there is no minimum enrollment duration required to receive the \$50 enrollment incentive. However, participants must meet the eligibility requirements outlined in the RMC Pilot tariff. As part of the enrollment process and the approval of the enrollment incentive, customers will need to agree to the program's Terms & Conditions, which have not been fully written at this time.

Information provided by: Wendy Marine, Lead Product Manager - Electrification

Attachment(s):



Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Kansas Central
Case Name: 2024 Evergy KS Central Transportation Electrification
Case Number: 25-EKCE-169-TAR

Requestor Astrab Joseph -
Response Provided January 16, 2025

Question:CURB-6

Because of the testimony being due on January 23, 2025, will you please expedite the responses to CURB 3-8.

Please describe the customer experience for AMC participants to define their preferred charging schedule. Along with any other pertinent details, please address the following:

- a) What increments are available for preferred battery percentage and time? (i.e., Can a participant select any percentage between 1-100% charge? Can time be selected to the minute or only by a certain increments)
- b) Can the preferred charging schedule vary by day (e.g., different schedule for weekdays than weekends)?
- c) Please describe the process to adjust the preferred schedule. How frequently can the customer alter their preferred charging schedule and how soon does the change go into effect?

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

AMC participants will use an app to define their charging preferences with ""need by time"" and target battery percentage being the two primary inputs.

- a) The “need by time” input is in 30 min increments, and the target battery percentage is in 5% increments. Please see the attachment titled “*QCURB-3_Charging Preferences Set Up Screen Shots*”.

Note that EVSE devices don't have a target charge because they do not currently support state of charge (""SOC"") as an available datapoint.

- b) The preferred charging schedule does not recognize day to day changes or different weekday vs weekend schedules, but the driver charging needs can be forecasted based on observed



- driving behavior (e.g. driver X may be observed to need their vehicle by 7AM because 90% of the time they unplug by then, despite their app setting showing a need-by time of 8AM).
- c) Drivers can choose to reset “need-by times” on any given day as many times as they want, and each change goes into effect in under 15 minutes. Also, drivers can choose to opt out of any charge pauses by selecting "Charge Now" in the app, or by unplugging/replugging the charger connector.

Information provided by: Wendy Marine, Lead Product Manager - Electrification

Attachment(s):

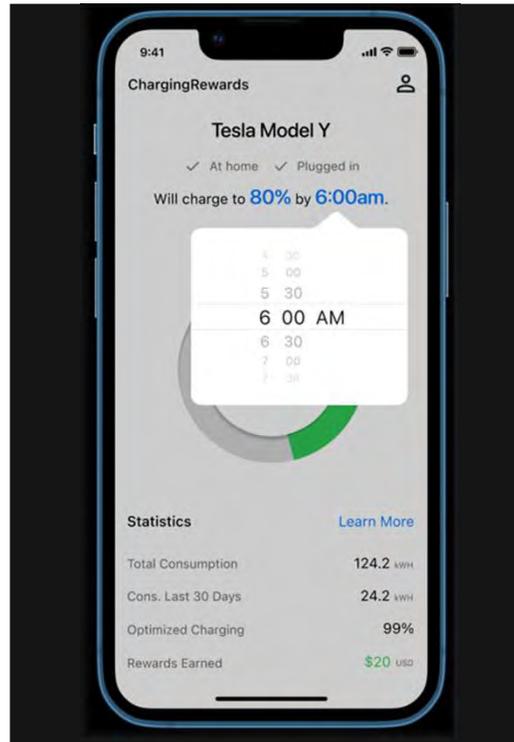
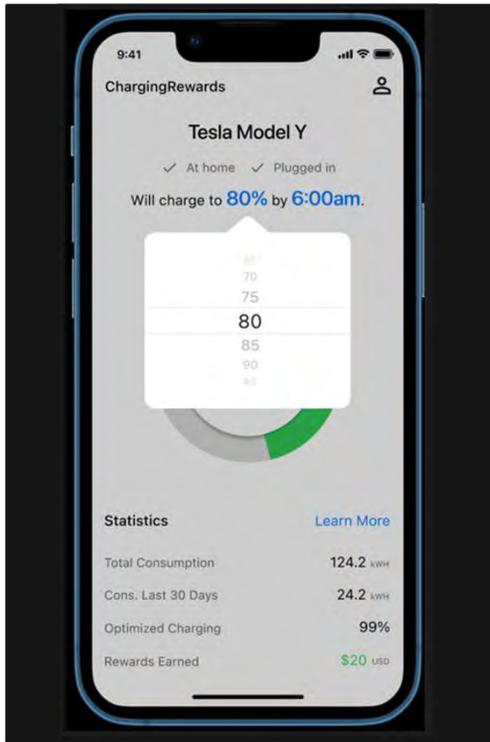
QCURB-3_ Charging Preferences Set Up Screen Shots.ppt

Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs

Charging Preference Set Up - Example





Evergy Kansas Central
Case Name: 2024 Evergy KS Central Transportation Electrification
Case Number: 25-EKCE-169-TAR

Requestor Astrab Joseph -
Response Provided January 16, 2025

Question:CURB-7

Because of the testimony being due on January 23, 2025, will you please expedite the responses to CURB 3-8.

The Company has reserved the right to adjust AMC incentive values. Please describe Evergy's process for monitoring when and how to adjust the incentive values. How does Evergy plan to provide notification to participants of any such change, and what does Evergy perceive the Commission and other intervenor's roles to be in the process?

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: Choose an item.

Response:

Evergy expects to review pilot progress and consider incentive updates on a quarterly basis. In these quarterly reviews, Evergy will assess whether the pilot is making the expected level of progress toward the intended outcomes (e.g. target enrollment level). If not, Evergy will consider adjustments to incentives and other tactics, while remaining true to the overall pilot strategy.

Any adjustment to incentives and Evergy's supporting rationale will be shared with the Commission and intervenors in the annual report. As Evergy does not expect to make changes that would increase the total pilot budget or affect the targeted learnings, we perceive the role of the Commission and intervenors is to remain informed and to ask questions about the rationale if they perceive it to be unclear.

If incentive updates are made, program participants will be informed through the program's established communication channels: Program web page, email, and/or text.

Information provided by: Wendy Marine, Lead Product Manager - Electrification

Attachment(s):



Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Kansas Central
Case Name: 2024 Evergy KS Central Transportation Electrification
Case Number: 25-EKCE-169-TAR

Requestor Astrab Joseph -
Response Provided January 16, 2025

Question:CURB-8

Because of the testimony being due on January 23, 2025, will you please expedite the responses to CURB 3-8.

When advising FAS participants regarding fleet vehicles and EV charging equipment, how will Evergy maintain neutrality and customer autonomy toward various products from different brands and vendors in external competitive markets (i.e., Chevy, Ford, Chargepoint, EVgo, specific vehicle dealerships, etc.)?

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

Importantly, Evergy is not partnered with any vehicle, dealership, or charging equipment provider.

The fleet advisory report will include all vehicles and charging equipment from various Original Equipment Manufacturers (OEMs) and vendors available in the region that meet the financial and operational needs of the participants as determined during the engagement. In cases where participants have specific preferences, such as loyalty to American-made products, these preferences will be respected and incorporated.

Note: This program is for planning support only and does not include vehicle or charger procurement services.

Information provided by: Julie Dietrich

Attachment(s):



Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy Kansas Central
Case Name: 2024 Evergy KS Central Transportation Electrification
Case Number: 25-EKCE-169-TAR

Requestor Ellis Lana -
Response Provided December 13, 2024

Question:KCC-7

Regarding: Residential Managed Charging Incentives
Please explain how the Residential Managed Charging incentive values were determined. In addition, please provide documentation supporting the derivation of those values.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: Choose an item.

Response:

Customers enrolled in the Passive Managed Charging will not receive program incentives. This is consistent with other opt-out behavioral programs.

Customers enrolled in Active Managed Charging will receive an up-front incentive of \$50 and will be eligible for an ongoing participation incentive of \$10 monthly. Evergy determined the Active Managed Charging incentives by: 1) Reviewing the range of incentives used in similar utility managed charging programs across the country, and 2) Selecting a value judged adequate to secure the participation level needed for pilot learnings.

Several of the utility programs considered are:

- SRP EV Flex Charge: \$50 for enrollment and \$25 per year for participation
- Portland General Electric: \$50 for enrollment and \$50 per year for participation
- Xcel Energy Charging Perks: \$50 for enrollment and \$150 per year for participation
- Eversource Connecticut Electric Vehicle Charging Program: \$100 for enrollment and \$200 per year for participation
- CPS Energy FlexEV Smart Rewards: \$250 for enrollment and \$60 per year for participation

In terms of securing the target participation level, there was little available data on the effectiveness of the incentives (i.e. percent enrollment of eligible EV customer population as a



result of differing incentive levels). Evergy's target cumulative Active Managed Charging participation level amounts to nearly 10% of the expected eligible EV population, which is a high level of participation by DSM program standards. Eversource reported enrollment of approximately 10% of EV customers after slightly more than two years of launch. However, considering the significantly lower electricity costs in Evergy territory, Evergy judged that an incentive level closer to that of Xcel Energy's (Colorado) would still be very likely to generate target participation while also representing costs more likely to be sustainable if the pilot were to become a program.

These judgements are necessarily approximations based on the limited available data, to be refined based on the pilot learnings and subsequent cost effectiveness analysis.

Information provided by:

Wendy Marine, Lead Product Manager

Attachment(s):

Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*

Director Regulatory Affairs



Evergy Kansas Central
Case Name: 2024 Evergy KS Central Transportation Electrification
Case Number: 25-EKCE-169-TAR

Requestor Ellis Lana -
Response Provided December 13, 2024

Question:KCC-8

Regarding: FAS Program Differentiation

Please explain how Evergy's proposed Fleet Advisory Services program services differs from third-party fleet advisory services currently available within Evergy's Kansas territories.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

Businesses that electrify their fleets have varied resources and capabilities to bring electric vehicles into their operations. Not every business has the funding and/or motivation to invest in a comprehensive fleet assessment. Here are some common scenarios:

- **Funding-Dependent Businesses:** Need to secure funding first to hire an advising firm. Once funding is awarded, their goal is to implement the project on time and within a specific budget.
- **Manufacturer or Supplier-Dependent Businesses:** Rely on their electric vehicle manufacturer or charger supplier to implement their project within a specific budget, often seeking turnkey solutions.
- **Resource-Limited Entities:** Entities like school districts often do not have the funds to invest in fleet assessments, leaving the responsibility to individuals like the superintendent or fleet manager.

Offering a utility-run fleet advisory program ensures that all stakeholders are involved from the very beginning (early planning/decision-making stage) and that recommendations are based on detailed technical assessments and long-term planning. This integrated approach prevents the kind of piecemeal, less effective solutions that might be seen with third-party services, ensuring that all investments are purposeful and beneficial for both the customer and the grid.



Additionally, what customers receive from third-party services is not duplicative of what they receive from a utility-run program. Third-party services often focus on immediate project needs and charger installations, while utility-run programs provide a more holistic approach that includes grid optimization, stakeholder engagement, and long-term planning. This differentiation ensures that utility-run programs add unique value, benefiting other ratepayers by promoting grid stability and efficiency, which can lead to lower overall costs and improved service reliability.

Key Differentiators of Evergy’s Fleet Advisory Services:

Holistic Stakeholder Engagement

Evergy’s Approach: Emphasizes the identification and involvement of all necessary stakeholders from the outset, including utility designers, fleet managers, technical advisors, and other key parties to ensure a comprehensive and coordinated approach. **Third-Party Services:** Often lack this level of stakeholder integration, focusing primarily on the installation of chargers without fully considering the broader implications for the grid and other stakeholders.

Effective Communication

Evergy’s Approach: Maintains clear and consistent communication among all stakeholders to facilitate smooth project execution and ensure alignment throughout the project lifecycle. **Third-Party Services:** Communication can be fragmented, leading to potential misunderstandings and misalignments that can delay or complicate project execution.

Comprehensive Technical Assessments

Evergy’s Approach: Conducts thorough evaluations to understand the entire fleet’s needs, informing both near-term and future implementations. This includes evaluating route energy requirements, right-sizing equipment, and creating detailed load profiles. **Third-Party Services:** Often less comprehensive, focusing on short-term solutions rather than long-term fleet requirements and grid impacts.

Optimal Charger Placement

Evergy’s Approach: Engages utility designers to determine the best placement of charging infrastructure, ensuring proximity to the electrical source, reducing installation costs, and improving efficiency. **Third-Party Services:** Recommendations may not always consider optimal grid locations, potentially leading to higher costs and inefficiencies.

Aligned Installation Timelines

Evergy’s Approach: Coordinates the timeline for utility upgrades and charger installations with the delivery schedule of the buses, ensuring infrastructure readiness. **Third-Party Services:** May not align installation timelines as closely with vehicle delivery, risking delays and operational disruptions.

Supply Shortage Considerations

Evergy’s Approach: Factors in potential supply shortages and their impact on project timelines,



ensuring realistic planning and execution. **Third-Party Services:** May not adequately account for supply chain issues, leading to unexpected delays and increased costs.

Rate and Managed Charging Education

Evergy's Approach: Educates stakeholders on rate structures and managed charging practices to optimize costs and grid impact, promoting more sustainable and economical fleet operations. **Third-Party Services:** Often lacks this educational component, missing opportunities to optimize charging practices and reduce costs.

Right-Sizing Transformers

Evergy's Approach: Ensures that transformers and other utility-side infrastructure are right-sized based on detailed load profiles and energy needs assessments, preventing inefficiencies and increased costs. **Third-Party Services:** May not provide the same level of detail in right-sizing transformers, potentially leading to suboptimal infrastructure.

Information provided by: Julie Dietrich

Attachment(s):

Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs

CERTIFICATE OF SERVICE

25-EKCE-169-TAR

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 23rd day of January, 2025, to the following:

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