

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

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**REBUTTAL TESTIMONY  
OF  
WENDY A. MARINE**

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

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

**DOCKET NO. 25-EKCE-169-TAR**

**FEBRUARY 20, 2024**

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

2 A: My name is Wendy A. Marine. My business address is 1200 Main, Kansas City, Missouri  
3 64105.

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

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

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

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

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

14 A: I am responsible for the development and execution of programs for electric vehicle  
15 charging infrastructure, catering to both residential and commercial customers.  
16 Additionally, I manage Evergy’s public charging network, the Clean Charge Network. In  
17 my role, I manage external vendors as well as collaborate with various internal and external  
18 stakeholders to ensure continuous process efficiencies, prudent cost management, customer  
19 satisfaction, and thorough evaluation of program performance to established program and  
20 performance metrics.

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

22 A: I graduated from the University of Central Florida with a Bachelor of Science in  
23 Accounting. And from the same university, I received a Master of Business Administration.

1 I have worked for Evergy since 2013 where I have held positions as Senior Product  
2 Manager responsible for standing up and operationalizing a non-regulated solar business  
3 (Evergy Energy Solutions), Senior Product Manager responsible for evaluating venture  
4 capital and private equity investments for Evergy (Evergy Energy Ventures), until moving  
5 to my current position in 2017 as Lead Product Manager – Transportation Electrification.

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

8 A: No.

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

10 A: The purpose of my testimony is to respond to certain positions presented in the direct  
11 testimony filed on January 23, 2025, on behalf of the Kansas Corporation Commission  
12 (“Commission”) Staff (“Staff”) regarding the Residential Managed Charging (RMC) Pilot.

13 **Q: Please provide a brief overview of your rebuttal testimony.**

14 A: In my rebuttal testimony below, I first address Staff’s recommendation to increase the  
15 minimum threshold number of charging days for eligibility for the program from 1 to 5  
16 days. I discuss why Staff’s recommended increase would not be beneficial, but instead  
17 would likely decrease participation in the program. Second, I address Staff’s discussion of  
18 the need for a Communications Plan, and I discuss Evergy’s intent to develop a  
19 Communications Plan in a manner that addresses Staff’s concerns raised in its Direct  
20 Testimony.

1 **Q: Has Staff made recommendations for steps to be taken to ensure sufficient data is**  
2 **collected?**

3 A: Yes, Staff has made recommendations to both Program Design and Reporting Structure to  
4 ensure sufficient data is collected. I will address Program Design with my testimony while  
5 the testimony of Company witness Timothy Nelson addresses Reporting Structure.

6 **Q: What has Staff recommended to mitigate their concerns with the program Pilot**  
7 **Design?**

8 A: Staff has made the following recommendations:

- 9 • Increase the minimum number of charging days from one day to five days per month  
10 to be eligible for the Active Managed Charging (AMC) program's ongoing  
11 participation incentive, and
- 12 • Develop a detailed Communications Plan to address Staff's program design concerns

13 **Q: Are five charging sessions per month necessary to adequately measure AMC impacts**  
14 **for a given participant?**

15 A: No. Requiring five days per month (per AMC program participant) is not necessary and  
16 may in fact undermine Staff's objective of achieving data adequacy. Evergy has obtained  
17 information from other utilities' managed charging pilots and programs. The minimum  
18 threshold required number of monthly sessions in these comparable programs ranges from  
19 0 to 2. Despite these lower threshold requirements, the reported median monthly charging  
20 sessions for those programs is noticeably higher, ranging from 10.5 to 13.3 charging  
21 sessions per month. These data illustrate that it is not necessary to have a high threshold  
22 for participation in order to generate sufficient participation and charging events to create  
23 a sufficiently large data set. In fact, contrary to Staff's stated position, Evergy believes that

1 a higher threshold will be perceived as onerous by potential participants, and will actually  
2 discourage participation, resulting in a smaller and less informative data set.

3 **Q: What concerns did Staff have regarding the pilot program Communications Plan and**  
4 **did they make any recommendations for improvement?**

5 A: Staff expressed concern that the Communications Plan for “educational and motivational  
6 communications to shape charging behavior” was vague. Staff recommended that the  
7 Communications Plan include details on the messaging, design, delivery and frequency of  
8 communications directed at participants in each group (except control groups) including  
9 specific key performance metrics and benchmarking with similar external EV programs  
10 (when applicable) to measure progress and effectiveness, and to be able to adjust  
11 communication and educational materials over the life of the pilot.

12 **Q: Does Evergy plan to develop a Communications Plan that addresses Staff’s concerns?**

13 A: Yes. Evergy concurs with Staff’s recommendation to create a Communications Plan for the  
14 Pilot. Once the final program details are approved by stakeholders and the Commission,  
15 Evergy will develop a campaign strategy that considers the agreed-upon programs,  
16 individual requirements, identified customer segments, and desired outcomes and goals.

17 A key factor in developing this Plan will be the final approved program and stipulation  
18 information, making it crucial to wait for approval before building out communication  
19 strategies. Since many program details, such as audience, goals, and budgets, can change  
20 during the stakeholder approval process, it is important to wait to develop a communication  
21 plan that incorporates the appropriate stakeholder feedback. This approach has been  
22 consistently used in past program approvals and stakeholder discussions, including for  
23 KEEIA 22-EKME-254-TRA, Electrification Filing 21-EKME-320-TAR, and Time of Use

1 Rate outreach. Similar to these past education plans, Evergy will use key performance  
2 indicators and benchmarking to evaluate campaign performance. Our recently filed  
3 Electrification marketing plan and KEEIA marketing plan are good examples of how  
4 Evergy develops comprehensive plans with measurements, which were each filed  
5 approximately six months after the approval of the programs.

6 **Q: Are their additional details about the pilot program Communications Plan that can**  
7 **be shared to mitigate Staff's concerns?**

8 A: Yes. Customers on TOU rates will receive weekly coaching that provides a breakdown of  
9 their charging across different TOU periods. These insights will be based on advanced  
10 disaggregation algorithms that infer charging behavior from whole home use. These emails  
11 will give customers a combination of financial motivation — referencing the savings  
12 customers will achieve by moving charging to off-peak times — as well as non-financial  
13 motivations, including environmental benefits and grid health. Evergy will control which  
14 non-financial benefit frames are used, as well as the specific messages. Customers that are  
15 not on TOU rates will receive weekly energy engagement email communications with EV  
16 educational insights on a weekly basis and personalized EV insights included at the end of  
17 each bill period. These insights will show their average charging profile over the course of  
18 a day, and will also show powered disaggregation algorithms. In these communications,  
19 the benefit frames will be purely non-financial — environment, air quality, grid health, and  
20 more — and the ask to the customer will focus on the ease of setting a charging schedule.  
21 All specific messaging will be refined by Evergy based on observations throughout the  
22 pilot. While the default messaging is informed by relevant behavioral science literature and

1 user testing with EV drivers across the country, it will be adapted to Evergy's EV drivers  
2 in Kansas specifically based on their profile and needs.

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

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

STATE OF KANSAS                    )  
  ) ss:  
COUNTY OF SHAWNEE            )

**VERIFICATION**

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

Wendy Marine  
Wendy Marine

Subscribed and sworn to before me this 20<sup>th</sup> day of February, 2025.

Leslie R. Wines  
Notary Public

My Appointment Expires:

*May 30, 2026*





## CERTIFICATE OF SERVICE

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

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