

BEFORE THE CORPORATION COMMISSION
OF THE STATE OF KANSAS

IN THE MATTER OF THE KANSAS CITY]
POWER & LIGHT'S APPLICATION TO] KCC Docket No. 16-KCPE-160-MIS
DEPLOY AND OPERATE ITS PROPOSED]
CLEAN CHARGE NETWORK.]

DIRECT TESTIMONY OF

ANDREA C. CRANE

ON BEHALF OF

THE CITIZENS' UTILITY RATEPAYER BOARD

June 6, 2016

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Appendix A - List of Prior Testimonies

1 **I. STATEMENT OF QUALIFICATIONS**

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

3 A. My name is Andrea C. Crane and my business address is PO Box 810, Georgetown,
4 Connecticut 06829.

5

6 **Q. By whom are you employed and in what capacity?**

7 A. I am President of The Columbia Group, Inc., a financial consulting firm that specializes in
8 utility regulation. In this capacity, I analyze rate filings, prepare expert testimony, and
9 undertake various studies relating to utility rates and regulatory policy. I have held several
10 positions of increasing responsibility since I joined The Columbia Group, Inc. in January
11 1989. I became President of the firm in 2008.

12

13 **Q. Please summarize your professional experience in the utility industry.**

14 A. Prior to my association with The Columbia Group, Inc., I held the position of Economic
15 Policy and Analysis Staff Manager for GTE Service Corporation, from December 1987 to
16 January 1989. From June 1982 to September 1987, I was employed by various Bell Atlantic
17 (now Verizon) subsidiaries. While at Bell Atlantic, I held assignments in the Product
18 Management, Treasury, and Regulatory Departments.

19

20 **Q. Have you previously testified in regulatory proceedings?**

21 A. Yes, since joining The Columbia Group, Inc., I have testified in over 400 regulatory

1 proceedings in the states of Arizona, Arkansas, Connecticut, Delaware, Hawaii, Kansas,
2 Kentucky, Maryland, New Jersey, New Mexico, New York, Oklahoma, Pennsylvania, Rhode
3 Island, South Carolina, Vermont, Washington, West Virginia and the District of Columbia.
4 These proceedings involved electric, gas, water, wastewater, telephone, solid waste, cable
5 television, and navigation utilities. A list of dockets in which I have filed testimony since
6 January 2008 is included in Appendix A.

7
8 **Q. What is your educational background?**

9 A. I received a Master of Business Administration degree, with a concentration in Finance, from
10 Temple University in Philadelphia, Pennsylvania. My undergraduate degree is a B.A. in
11 Chemistry from Temple University.

12
13 **II. PURPOSE OF TESTIMONY**

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

15 A. On February 16, 2016, Kansas City Power and Light Company (“KCP&L” or “Company”)
16 filed an Application with the Kansas Corporation Commission (“KCC” or “Commission”)
17 requesting approval of a Clean Charge Network (“CCN”) Program and electric vehicle (“EV”)
18 charging station tariff. The Company is seeking authorization to install and operate
19 approximately 1,000 EV charging stations in its service territory, approximately 315 of which
20 would be located in Kansas. KCP&L is seeking to include the costs of the CCN Program in
21 base rates and to recover these costs from all ratepayers in Kansas. The Columbia Group, Inc.

1 was engaged by the State of Kansas, Citizens’ Utility Ratepayer Board (“CURB”) to review
2 the Company’s Application and to provide policy and ratemaking recommendations to the
3 KCC.

4
5 **III. SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS**

6 **Q. What are your conclusions and recommendations concerning the Company’s requested**
7 **CCN Project and associated cost recovery?**

8 A. My conclusions and recommendations are as follows:

- 9 ➤ The Company has not demonstrated that there is a need at the present time in Kansas
10 for the CCN Program as proposed.
- 11 ➤ The Company’s proposed program is potentially anti-competitive.
- 12 ➤ The Company’s proposed program would result in cross-subsidization of EV owners
13 by all Kansas customers.
- 14 ➤ Under the Company’s program, Kansas customers would be subsidizing not only
15 KCP&L customers that have electric vehicles, but also other EV owners that are not
16 customers of KCP&L and, in some cases, not residents of the State.
- 17 ➤ The technology for electric vehicle charging is evolving and the KCC should not lock
18 ratepayers into a technology that may be obsolete before a substantial need arises.
- 19 ➤ KCP&L should not be determining public policy, especially when such policies
20 increase ratepayer costs while enhancing shareholder earnings.
- 21 ➤ The KCC should reject KCP&L’s CCN Program, as proposed.

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IV. DISCUSSION OF THE ISSUES

A. Background

Q. Please provide a brief background of this proceeding.

A. Pursuant to a Settlement Agreement in KCP&L’s last base rate case, KCC Docket No. 15-KCPE-116-RTS (“15-116 Docket”), the parties agreed to petition the Commission to open a docket to investigate the issue of EV charging stations. Specifically, the Settlement Agreement in the 15-116 Docket stated:

Without providing precedent for any party’s position or hindering any party’s future position on the issue of electric vehicle (EV) charging stations and KCP&L’s Clean Charge Network, KCP&L, Staff and CURB agree to jointly petition the Commission to open a generic docket to work collaboratively with the Company to investigate and evaluate the issue of EV charging stations. Such petition filing shall be filed as soon as possible, but no later than October 1, 2015, and will include a proposed procedural schedule that, if approved, would ensure completion of the docket within one year so that KCP&L will have sufficient time to address the issue of EV charging stations in the abbreviated rate proceeding in accordance with the resulting final order of the Commission in the generic docket. The Signatory Parties further agree that KCP&L may request revenue requirement and tariffs related to the EV charging stations in the abbreviated rate case in accordance with the Commission’s final order in the generic docket.¹

On September 25, 2015, KCP&L, Staff, and CURB filed a Joint Petition to Open General Investigation Docket regarding the issue of EV charging stations and related issues. That filing was docketed as KCC Docket No. 16-GIME-160-GIE. On February 2, 2016, the Commission issued its order, limiting the investigation to a KCP&L-specific proceeding and

¹ Docket No. 15-KCPE-116-RTS, Partial Settlement Agreement on Revenue Requirements, page 11.

1 changing the docket number to KCC Docket No. 16-KCPL-160-MIS (“16-160 Docket”).

2 In its Order opening this investigation, the Commission directed KCP&L to file an
3 Application and supporting Testimony that included “a comprehensive plan detailing the cost
4 of its proposal and the need for the proposed network.”² The Company was also directed to
5 advise the Commission on the status of the existing network, to explain the benefit of a large
6 network rather than a smaller pilot program, and to address certain legal issues that had been
7 identified by KCP&L, Staff, and CURB including:

- 8 a) Is the provision of EV charging services a public utility function under Kansas law?
- 9 b) Does the sale of electricity as a transportation fuel source constitute “furnishing
10 power” under Kansas law?
- 11 c) Would certification of private charging entities within incumbent electric public utility
12 service areas conflict with Kansas law?
- 13 d) Do any conflicts exist between current Kansas law and utility implementation of EV
14 charging stations?
- 15 e) Do any general conflicts exist between current Kansas policy and utility
16 implementation of EV charging stations?
- 17 f) Should a regulated electric public utility be allowed to enter a potentially competitive
18 marketplace?
- 19 g) Do utility-provided EV charging stations result in cross-subsidization leading to rates
20 that are unreasonably discriminatory or unduly preferential?

2 Order in Docket No. 16-KCPE-160-MIS, February 2, 2016, page 3.

- 1 h) Do utility-provided EV charging stations serve the public interest?
- 2 i) What is the impact of charging stations on a utility's retail customers?
- 3 j) What is the impact of charging stations on a utility's distribution system?
- 4 k) What pricing alternatives should be considered for electric vehicle charging stations
- 5 like KCP&L's Clean Charge Network?

6 As a result of the Commission's February 2, 2016 Order, KCP&L subsequently filed this
7 Application and supporting testimony.

8

9 **Q. What issues are you addressing on behalf of CURB?**

10 A. I am addressing various policy and ratemaking issues relating to the proposed program. While
11 I am not an attorney, and therefore my testimony is not intended to address any legal issues,
12 many of the "legal" issues identified by the parties and delineated in the Commission's Order
13 initiating this proceeding relate to policy and ratemaking questions that are independent from
14 issues relating to Kansas law. Therefore, I will also comment on those issues identified above
15 that do not relate strictly to Kansas law.

16

17 **Q. How is your testimony organized?**

18 A. In Section B, I provide a brief overview of the Company's proposal. In Section C, I provide
19 my evaluation of the CCN Program and discuss my concerns regarding the program as
20 proposed. In Section D, I address those issues that have been previously been identified by
21 KCP&L, Staff, and CURB, and that were delineated in the Commission's Order opening this

1 docket. Finally, in Section E, I summarize my testimony and conclusions.

2
3 **B. Description of the Company’s Proposal**

4 **Q. Please describe the program proposed by KCP&L.**

5 A. KCP&L is proposing to construct and operate approximately 1,000 EV charging stations
6 throughout its service territory. Fifteen of these stations will be Level 3 charging stations,
7 which are capable of charging from empty to 80% capacity in 20 minutes. The remainder will
8 be Level 2 charging stations, which provide a 20-25 mile capacity for every hour charged.
9 The Company claims that these stations will be capable of supporting 12,000 EVs with little
10 or no waiting time and up to 25,000 EVs with moderate waiting time. The Company
11 estimates that there will be 315 Level 2 charging stations in Kansas. In addition, it has
12 identified six locations in Kansas for Level 3 stations. KCP&L is seeking authorization for up
13 to a total of 350 stations in Kansas at 100 host locations. The host sites must to agree to pay
14 for usage through December 2016 or until there is a Commission-approved tariff covering
15 charging stations. The standard host contract is for ten years.

16
17 **Q. Where will these stations be located?**

18 A. Level 3 sites are located in high traffic retail locations. In identifying Level 2 sites, the
19 Company targeted locations such as educational institutions, healthcare facilities, hospitality
20 sites, multi-family dwellings, municipal sites, parks and recreational areas, retail, and other

1 public places.³ In addition, the Company attempted to distribute the host sites throughout its
2 service territory and to provide at least some host sites in outlying areas. On page 10 of her
3 testimony, Ms. Riggins indicated that “Two Kansas cities ultimately voted not to provide host
4 sites due to reluctance to pay the energy costs for up to two years.” In response to CURB-12,
5 the Company indicated that there were actually four such Kansas cities, but also noted in that
6 response that there are 156 non-municipal CCN stations in service in those areas.
7

8 **Q. How does the Company propose to charge for usage at the EV charging stations?**

9 **A.** Nissan Motor Company, through a partnership with KCP&L, will pay for all usage at Level 3
10 sites. Usage at Level 2 sites may be paid for either by the host or by the EV customer,
11 depending on the host’s arrangement with the Company, at tariff rates. KCP&L is proposing
12 to charge \$0.1088 per kWh for Level 2 usage and \$0.1180 for Level 3 usage. In addition,
13 these rates would be subject to applicable riders. As stated by Mr. Ives on page 9 of his
14 testimony, “using the proposed Schedule CCN rates and rider factors applicable as of
15 February 2016, the all-in rate before taxes and any Session Charges for Level 2 charging
16 stations would be \$0.1347/kWh and the all-in rate before taxes and any Session Charges for
17 Level 3 charging stations would be \$0.1428/kWh.” The proposed Level 2 and Level 3 rates
18 are designed to approximate an “all in” residential and small commercial rate.
19

20 **Q. What is a “session charge”?**

3 Testimony of Ms. Riggins, page 5.

1 A. Host locations have the discretion to charge users a per session fee. The per session fee is
2 intended to provide an incentive for users to move their cars promptly after the vehicle is
3 charged. A host may implement a two-tier session fee, for example, there could be no fee for
4 the initial period with a fee imposed for longer stays. The per session fee imposed by hosts
5 cannot exceed \$6.00 per hour. The session fee is not retained by the host. Instead, this fee
6 will be remitted to the Company and applied toward recovery of the capital investment of the
7 CCN Program. According to the response to CURB-28, to date none of the host locations has
8 implemented a session fee.

9

10 **Q. Please describe the Company's agreement with ChargePoint.**

11 A. KCP&L has entered into an agreement with ChargePoint for billing and collection services.
12 Pursuant to this agreement, EV users will open an account with ChargePoint. They will then
13 use their ChargePoint accounts to pay for EV charging. ChargePoint will also provide a
14 mobile app to help motorists find available stations, as well as other support such as how-to
15 videos, responses to frequently asked questions, and 24 hour support for users. ChargePoint
16 operates the world's largest network of EV charging stations.

17

18 **Q. What is the estimated annual cost of the CCN Program?**

19 A. The total projected capital cost is \$16.6 million, as referenced on page 8 of Mr. Caisley's
20 testimony, approximately \$5.6 million of which would be invested in Kansas. KCP&L
21 witness Ives estimates that the annual revenue requirement associated with the program is

1 \$1,227,000. He characterizes this revenue requirement as a “simple look at the capital,
2 depreciation and O&M costs”, without consideration of certain property tax credits or deferred
3 taxes, and without consideration of “other CCN benefits.”
4

5 **Q. How many charging stations are currently in-service in Kansas?**

6 A. According to the response to CURB-29, as of April 6, 2016, the DOE identified 95 EV
7 charging stations, with 191 charging ports, that are not owned by KCP&L available in Kansas.
8

9 **Q. How does this compare to the number of vehicles in the Company’s service territory?**

10 A. According to the response to CURB-26, approximately 3,400 EVs have been sold in the
11 Company’s service territory since 2010. While the number of new vehicles sold is increasing,
12 it is still a small fraction of the total market.
13

14 **Q. What is the status of the Company’s request in Missouri?**

15 A. The Missouri Public Service Commission (“MPSC”) has initiated a docket to examine issues
16 relating to EV charging stations. The MPSC has scheduled a stakeholder workshop for May
17 25, 2016. A Staff Report is due by July 1, 2016. Other parties may comment on the Staff
18 Report by September 1, 2016.
19

20 **C. Evaluation of the Company’s CCN Program**

21 **Q. What issues should the KCC consider as it evaluates the CCN Program?**

1 A. The KCC must first consider whether there is a need for an EV charging program. If the KCC
2 finds that there is a need, it must evaluate what role, if any, KCP&L should play in facilitating
3 the charging of electric vehicles. Finally, if the KCC believes that KCP&L should have a role
4 in these activities, it must decide how the associated costs should be recovered and from
5 whom.

6

7 **Q. Has KCP&L demonstrated that there is a need at the present time for an EV charging**
8 **station program in Kansas?**

9 A. No, it has not. There is no evidence that EV customers in Kansas are having difficulty
10 charging their vehicles, or that such customers are looking to KCP&L to facilitate
11 development of an EV charging market. The documentation provided by KCP&L in this case
12 is general, speculative, and anecdotal. On page 12 of Mr. Caisley’s testimony he states
13 “...this is a service our customers are requesting” but he provides no support, either in
14 testimony or in discovery, that this is the case.

15

16 **Q. Does KCP&L track requests for EV charging stations?**

17 A. No, they do not. According to the response to CURB-36, the Company does not track such
18 requests. Thus, this program is not being driven by public demand from customers in the
19 Company’s service territory for EV charging stations.

20

21 **Q. The Company claims that “customer research” is one of the factors that is driving the**

1 **EV charging network. Do you agree?**

2 A. No, I do not. On page 10 of his testimony, Mr. Caisley refers to “our customer research,
3 coupled with a myriad of national studies conducted on the subject of EV’s, shows significant
4 customer interest in electric vehicles.” When asked in discovery to provide the “customer
5 research upon which he was relying, Mr. Caisley responded with three articles that were not
6 specific to the Kansas territory and were in fact generic articles on electric car sales. Thus, the
7 Company provided no customer research to demonstrate that customer demand in Kansas is
8 driving the CCN program.

9

10 **Q. Didn’t Ms. Riggins suggest in her testimony that customers wanted more charging**
11 **stations and were willing to drive out of their way to shop at a location that had a**
12 **charging station?**

13 A. Yes, she did. However, these statements are misleading. In Schedule KLR-1, page 2, Ms.
14 Riggins provided a copy of a handout developed for potential host sites that extolled the
15 benefits of hosting an EV charging station. This handout includes statements that the majority
16 of KCP&L customers want more charging stations in their area and that more than a third will
17 drive out of their way to shop or visit a location that has an EV charging station. In Data
18 Requests KCC-19, the Company was asked to provide the underlying support for these
19 statements. KCP&L provided a survey questionnaire that had been completed by 1,169
20 panelists of the KCP&L Customer Advisory Online Panel. First, the survey is very self-
21 serving, in that it states that “KCP&L’s Clean Charge Network is a ground breaking electric

1 vehicle charging network that will further KCP&L’s leadership in environmental
2 sustainability. As a leader in environmental sustainability, KCP&L is excited to announce a
3 network of more than 1,000 electric vehicle charging stations across the region, one of the
4 largest electric vehicle charging station installation (sic) by an electric utility in the United
5 States.” Based on this introduction, the survey does not appear to be an objective survey
6 designed to elicit honest comments on electric vehicles. Instead, it appears to be biased
7 toward an EV charging program.

8 In addition, while I do not know exactly how the KCP&L Customer Advisory Online
9 Panel was selected, it strikes me that this panel may not represent the opinions of the
10 “average” KCP&L customer. Individuals willing to participate in such customer advisory
11 panels are probably likely to be more proactive, and more involved in the services offered by
12 the utility, than the customer body as a whole.

13 Even accounting for the biases in the design of the survey and in the population that
14 participated, the survey results do not indicate an overwhelming customer-perceived need for
15 the program. While it is correct that a “majority” of customers answered “Yes” when asked if
16 they would like to see KCP&L expand the number of stations in their area, there were only 9
17 responses, five of whom said “Yes”. While technically the Company is correct in that the five
18 represented a majority of the 9 that responded, I don’t believe that these responses signify an
19 overwhelming endorsement.

20 In addition, while 38% of the respondents stated that they would be willing to drive
21 “further/out of your way” to shop or visit a location that offered a charging station, 63% of

1 respondents indicated that they would not be willing to change their driving habits. Even
2 more interesting is that when asked if they would consider purchasing an electric vehicle if
3 KCP&L expanded charging stations in their area, 64% of the respondents answered “No”. In
4 addition, the overwhelming roadblock to the purchase of electric vehicle is “Price”, which
5 62% of the respondents selected as something that keeps them from owning an electric
6 vehicle. This was more than double the respondents who indicated that the lack of charging
7 stations on their driving route was the primary impediment.⁴ Thus, the survey results
8 provided by the Company do not demonstrate either a high demand for electric charging
9 stations or indicate that lack of such stations is responsible for the low demand for electric
10 vehicles.

11
12 **Q. Please comment on the Electric Power Research Institute (“EPRI”) study that the**
13 **Company provided in support of its Application.**

14 A. The Company did file an EPRI study with its Application, presumably in support of this
15 proposal. However, the CCN Program is not been undertaken as a result of findings from the
16 EPRI study – it is actually the reverse, the EPRI study was undertaken in order to support
17 KCP&L’s unilateral decision to implement the CCN Program prior to obtaining KCC
18 authorization.

19 In the response to CURB-14, KCP&L stated that it began discussing “study
20 opportunities” with EPRI in January 2015. By then, the Company had already stated publicly

4 Respondents were permitted to select more than one reason.

1 that it intended to build the largest electric vehicle charging station installation by an electric
2 utility in the United States. Moreover, on page 4 of his testimony witness Daniel
3 Bowermaster, supporting the EPRI study, calls it a “scoping study” to establish an initial
4 estimate of potential value. In fact, he states that “it is EPRI’s understanding that KCP&L
5 will direct further investigation of the various value elements in more detail. This will allow
6 the initial results to be validated and made more specific to the final plan proposed.” In
7 response to CURB-17, the Company indicated that “Based on the current proposed scope, the
8 final report will be available first quarter 2018.” However, by the first quarter 2018, KCP&L
9 plans to have completed its CCN Program installation. Thus, the EPRI study is clearly not
10 driving the Company’s actions in this case. Instead, KCP&L decided to undertake the CCN
11 Program, and later looked to EPRI to develop documentation in support of that decision.

12
13 **Q. Has deployment of these stations proposed under the CCN Program already begun?**

14 **A.** Yes, in spite of the fact that the Company has not received authorization from this
15 Commission, KCP&L is already well along with program implementation. KCP&L indicated
16 in response to CURB-13 that it began researching and developing a strategy with regard to EV
17 charging stations in 2010. In 2010, five charging stations were installed at three locations
18 pursuant to a grant obtained from the Department of Energy (“DOE”). Each of these charging
19 stations has both a Level 1 port (comparable to at home charging using 120) and a Level 2
20 port.

21 KCP&L further indicated in response to CURB-13 that the current plan “first started to

1 come together around the third quarter 2014.” The Company first unveiled its plans for the
2 CCN Program on January 26, 2015, announcing that it intended to undertake “the largest
3 electric vehicle charging station installation by an electric utility in the United States.”⁵ The
4 Company expects the CCN Program installation to be completed by August 2016, prior to a
5 decision in this case being rendered.
6

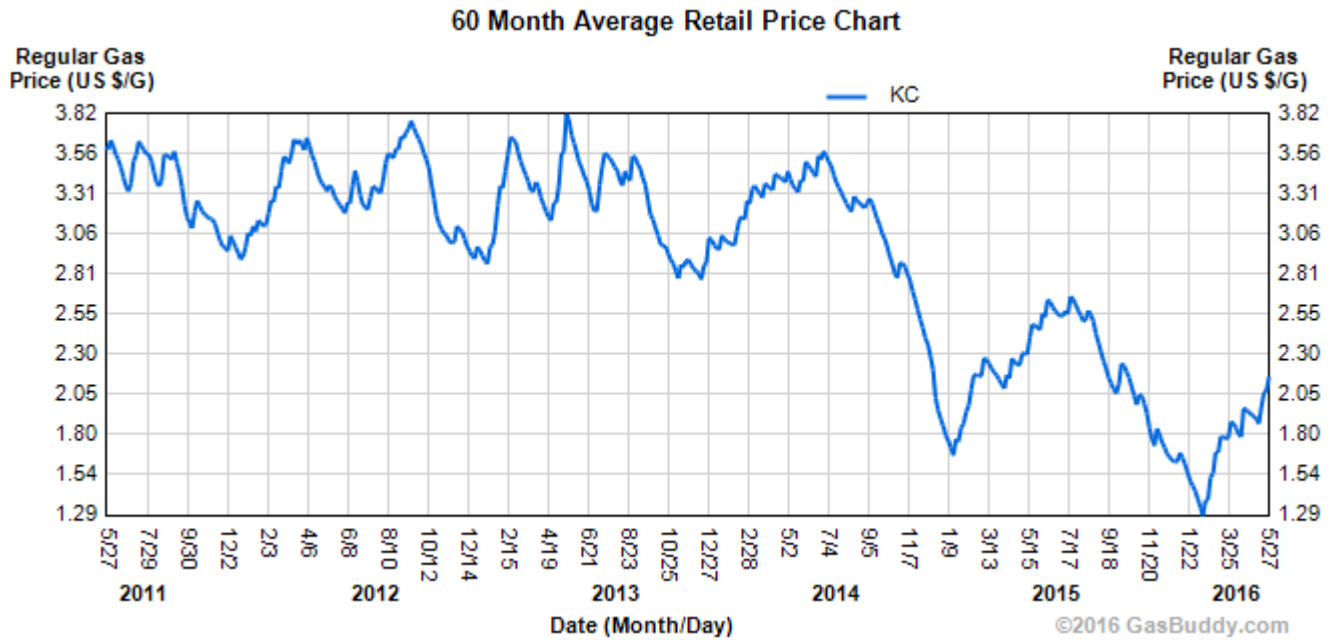
7 **Q. How much has the Company spent to date on the program?**

8 A. According to the response to CURB-1, through March 2016, the Company had incurred
9 capital costs of \$4,658,560. In addition, the Company has incurred operating costs of
10 approximately \$178,000. (Kansas jurisdictional) While the overall investment is not large
11 relative to KCP&L’s total rate base, it is striking that most of the capital costs have already
12 been incurred. In the response to CURB-23, the Company indicated that as of April 6, 2016,
13 the CCN network had 225 EV active charging stations in Kansas.
14

15 **Q. Do current gasoline prices justify the need for the proposed CCN Program?**

16 A. No, they do not. Moreover, not only do current gasoline prices fail to justify the investment,
17 but gasoline prices at the time that the program were announced were also relatively low and
18 unlikely to justify a program of this magnitude. As shown in the following chart, gasoline
19 prices in the Kansas City area began to fall in the summer of 2014 and have fallen
20 considerably since that time.

5 Application, Attachment A, page 1.



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Gasoline prices in July 2014 in the greater Kansas City area were approximately \$3.56 per gallon and have now fallen to approximately \$2.05 per gallon. In addition, while nobody knows exactly what future gas prices will be, most experts believe that gasoline price increases will be relatively modest in the next few years and will remain well below the high prices experienced in 2012-2013. In today’s market environment, gasoline prices are not the primary motivation for switching to an electric vehicle.

10 **Q. Is there another reason why you believe that the Company’s proposal to implement the**
 11 **CCN Program may be premature?**

12 **A.** Yes, there is. In addition to the lack of documentation demonstrating a need for EV charging
 13 stations in Kansas, the technology of charging electric vehicles is changing. While currently

1 there are three levels of charging stations, I understand that wireless charging technology is
2 currently being developed that will change the way that electric vehicles are charged and that
3 could eliminate the need for charging stations and physical connections to vehicles.
4 According to a recent article by Navigant Consulting, “several major automakers are planning
5 to bring wireless systems to market within the next few years, and a significant portion of the
6 industry believes that wireless technology represents the future of plug-in electric vehicle
7 (PEV) charging.”⁶ Wireless charging allows a vehicle to charge without being plugged into a
8 charger – simply by parking at the right spot. My concern is that the Company could be
9 implementing a program to meet a need that has not yet arisen (widespread charging of
10 electric vehicles), and by the time the need has evolved, the Company’s technology may
11 already be obsolete. Yet under the Company’s proposal, regulated Kansas electric customers
12 would continue to be responsible for both capital and operating costs associated with the
13 program, even if they themselves do not own an electric vehicle.

14
15 **Q. Isn’t it true that other utilities are entering the electric vehicle charging market?**

16 A. Yes, however, the primary examples provided by the Company relate to companies in
17 California. There is no showing that the automobile market in Kansas is similar to the market
18 in California. In fact, it is my understanding that California generally is a market-leader with
19 regard to both environmental issues and automotive issues. While the Company provided
20 examples of EV activities in a few states other than California, it does not appear that these

6 Wireless Charging Systems for Electric Vehicles, Navigant Research.

1 other states have adopted the model being proposed here, whereby regulated utility ratepayers
2 would be responsible for virtually all costs of the program.

3 According to a Report by several parties including the Sierra Club (“Sierra Club
4 Report”), in October 2013 the governors of California, Connecticut, Maryland, Massachusetts,
5 New York, Oregon, Rhode Island and Vermont signed a Memorandum of Understanding
6 (“MOU”) committing to work cooperatively to put 3.3 zero emission vehicles on the road by
7 2025. However, the Sierra Club Report indicates that these states are currently behind
8 projections for the number of EVs in service. One of the recommendations of the Sierra Club
9 Report is that charging station owners and operators should be exempt from regulation as a
10 public utility, and many states, including Maine, Maryland, Massachusetts and New York
11 have already taken this approach.”⁷ While each state is different, there is no evidence that
12 KCP&L customers in Kansas, or utility customers in other states, are demanding a widespread
13 utility charging program that would be financed by all ratepayers through regulated electric
14 utility rates.

7 Charging Up: The Role of States, Utilities, and the Auto Industry in Dramatically Accelerating Electric Vehicle Adoption in Northeast and Mid-Atlantic States, Conservation Law Foundation, Sierra Club, and Acadia Center, page 15.

1 **Q. Please comment on Mr. Caisley’s statement that state policy will need to address the EV**
2 **market.**

3 A. Mr. Caisley concludes on page 10 of his testimony that “EV’s are here to stay.” He goes on to
4 state that “It is just a matter of time before state policies will have to deal with a myriad of
5 issues resulting from EV adoption.” While Kansas policy makers may need to address issues
6 relating to EV adoption as the market develops, it would be premature for the Commission to
7 transfer these policy decisions to KCP&L at this time.

8
9 **Q. Should the Company have implemented the CCN Program prior to obtaining KCC**
10 **authorization?**

11 A. From a policy perspective, I don’t think the Company’s decision was wise, unless it believes
12 that the KCC will have no choice but to approve the program now that implementation has
13 begun – and in fact is almost complete. The Company’s decision to begin widespread
14 implementation prior to obtaining KCC authorization also calls into question how objective
15 the Company could be in any proceeding designed to investigate the issues relating to EV
16 charging stations. Since KCP&L has already invested a significant amount in this enterprise,
17 it is difficult to see how the Company could objectively evaluate either the need for the
18 program or whether any such program should be funded by regulated ratepayers.

19
20 **Q. If the CCN Program is not being driven by the market, then why do you believe that the**
21 **Company is so interested in pursuing the program at this time?**

1 A. I think there are at least two considerations. First, increased investment means increased
2 earnings for shareholders. Anytime that a utility undertakes a program that results in new
3 investment being included in rate base, there is a benefit to shareholders of increased earnings.
4 Capital investment is good for shareholders and is viewed positively by the investment
5 community. Second, as noted by KCP&L witness Mr. Caisley on page 27 of his testimony,
6 over the past several years demand for electricity has softened for the first time in history. At
7 the same time, utilities are under pressure to introduce energy efficiency programs that will
8 put further pressure on energy sales. Identifying new products, such as EV charging stations,
9 is one way that KCP&L can help mitigate some of this pressure on sales, especially if the
10 Company can gain approval to charge regulated ratepayers for the underlying costs.

11

12 **Q. Please summarize your conclusions regarding the need for the CNN Program.**

13 A. KCP&L has not demonstrated that there is a need in Kansas for the CCN Program at this time.
14 According to the Company's own survey, high vehicle prices, not the availability of charging
15 stations, is the leading impediment to development of the market. The market is also being
16 impacted by moderate gasoline prices. At the same time, new technology could significantly
17 change the manner in which vehicles are charged in the near future. All of these factors
18 suggest that the Company's program is premature.

19

20 **Q. Do you have also concerns about the utility being in the business of owning and**
21 **operating EV charging stations?**

1 A. Yes, I do, especially as proposed by KCP&L. The Company’s proposal would effectively
2 give KCP&L a monopoly on EV charging stations in Kansas. I will not address the legal
3 issues about the resale of electricity – those issues will be addressed by CURB in its Brief to
4 the extent necessary. However, I do believe that the KCC should be concerned about
5 concentrating this function in the utility.

6 Approving the proposed CCN Program would be analogous to requiring all cell phone
7 users to charge their phones using only a KCP&L-provided charger. Just think of the impact
8 such a requirement would have on competition. Similarly, consider the impact on competition
9 in the gasoline station market if gasoline vehicles were required to use only one brand of to
10 fill up. I doubt that either of these scenarios would be acceptable to the residents of Kansas –
11 nor should they be. Why then would the KCC authorize KCP&L to become a monopoly
12 provider of EV charging stations in the utility’s service territory? The Company’s proposal is
13 clearly anti-competitive and should be rejected.

14 It is interesting that on page 10 of his testimony, Mr. Caisley equates the need for
15 adequate charging stations with the need for easy access to gasoline stations. But gasoline
16 stations did not develop as offsets of regulated monopoly enterprises. In fact, gasoline was
17 initially dispensed primarily by hardware stores and general stores as a sideline to their
18 primary business of selling a multitude of retail goods. Today, the gasoline station business
19 is extremely competitive. It is possible that the model of various entities owning these
20 facilities would be a better one than a model where the electric utility had a virtual monopoly
21 on this industry.

1

2 **Q. Why is it so troublesome to have KCP&L as the principal provider of EV charging**
3 **stations?**

4 A. It is troublesome because as a regulated monopoly, KCP&L would be requiring ratepayers to
5 pay for EV charging stations that would be used by electric vehicle customers that are not
6 even customers of KCP&L – or customers of any Kansas utilities. This is because the
7 charging stations will be available to customers nationwide as they drive through Kansas – as
8 long as they have a ChargePoint account. Therefore, the Company’s proposal would require
9 Kansas ratepayers to subsidize EV users who were residents of other States and customers of
10 other utilities.

11 In addition, the Company’s proposal would discourage investment in EV charging
12 stations by non-regulated entities. On page 13 of Mr. Caisley’s testimony, he infers that utility
13 involvement is necessary to develop the market, and he states that currently, “the only time
14 EV charging is purchased and deployed is when a company or government entity installs
15 charging facilities for non-financial reasons like customer service or environmental
16 sustainability.” But these are exactly the reasons why a competitive entity may choose to
17 deploy EV charging, in spite of the fact that is not financially profitable. In fact, it is my
18 understanding that 75% of ChargePoint’s stations are operated by private sector companies.
19 KCP&L’s answer is to require the captive regulated ratepayers to foot the bill, so profitability
20 becomes even less of an issue. However, given the large potential subsidies available to
21 KCP&L’s EV charging stations, it may be even more difficult for a competitive entity to

1 justify entering the market. Moreover, while KCP&L states that EV charging stations
2 provide multiple societal benefits, such as environmental benefits and economic development,
3 the Company is not willing to have shareholders participate in the funding of these societal
4 benefits. If KCP&L believes that it should invest in EV charging stations because of the many
5 societal benefits that will result, then the KCC may want to require shareholders to participate
6 in the financing of those benefits in some manner.
7

8 **Q. Is there also a conflict for KCP&L between promoting EV charging stations and seeking**
9 **shareholder rewards for promoting energy efficiency programs?**

10 A. Yes, there is. It is somewhat ironic that the Company is in the position of advocating for
11 electric vehicles in this case while it is also seeking authorization for an aggressive Energy
12 Efficiency program in KCC Docket No. 16-KCPE-446-TAR in order to reduce load on the
13 system, including recovery of lost revenues and an “Economic Opportunity” for shareholders.
14 In this case, the Company is seeking to charge Kansas ratepayers for costs incurred in
15 promoting electric vehicle charging while in the 16-446 case the Company is seeking
16 shareholder incentives to reduce demand. I believe that this sends mixed signals to Kansas
17 ratepayers.

18 In addition, I question whether the electric utility is the appropriate entity to be
19 selecting ratepayer-funded public policy programs. While there may be societal benefits
20 associated with expansion of the electric vehicle market, such as reduced reliance on oil
21 imports, improvements to the environment, and enhanced economic development, the

1 question is whether it is the role of the local electric utility to be making these determinations,
2 or whether such decisions are better left to government agencies. In my opinion, it is not the
3 role of the utility to promote public policy but rather to carry out the policies that are adopted
4 by the duly-elected representatives of the citizens of each state. In this case, KCP&L's
5 proposal would require its ratepayers to subsidize users of EV vehicles not only from other
6 Kansas utilities, but from other states as well.

7
8 **Q. Does KCP&L acknowledge that its proposal results in cross-subsidization?**

9 A. Yes, the Company acknowledges that the proposed tariff rates will not be sufficient to recover
10 the majority of the costs of the program. Therefore, the vast majority of costs of the CCN
11 Program will be recovered through base rates charged to all ratepayers. The Company's
12 position is that the resulting cross-subsidization is neither unreasonably discriminatory nor
13 unduly preferential. However, Mr. Ives states on page 19 of his testimony that any cross-
14 subsidization "is offset by the benefits derived by all KCP&L Kansas customers from having
15 the CCN charging stations in our service territory...including the effect of the increased kWh
16 sales from the CCN helping to offset the fixed costs of the system."

17
18 **Q. Do you agree that the benefits of the CCN Program will outweigh the detriments of**
19 **cross-subsidization?**

20 A. No, I do not.⁸ Given that the Company has not demonstrated any real demand for the CCN

⁸ Neither Mr. Ives nor I are lawyers and neither of our comments are intended to provide legal opinions in this case.

1 Program at this time, it is difficult to justify the detriment to ratepayers based on speculative
2 “benefits” that may or may not materialize. Moreover, while the revenue requirement for the
3 CCN Program is not large relative to KCP&L’s overall revenues, there are other cross-
4 subsidization issues that should be considered by the KCC. For example, as mentioned
5 above, the Company’s proposal would not only result in regulated KCP&L customers in
6 Kansas subsidizing other KCP&L customers with electric vehicles, but it would also result in
7 subsidization of non-KCP&L customers and even of EV owners in other states. In addition,
8 the proposed tariff does not attempt to equate the cost of EV charging with gasoline prices but
9 in fact provides even a further subsidy to EV users. The Company states that its proposed
10 CCN Program tariff equates to filling up a traditional gasoline-powered vehicle rated at 33
11 MPG with gas priced from \$1.34 to \$1.42 per gallon.⁹ The tariff results in an effective
12 gasoline rate that is well below current levels, even with currently modest gasoline prices.
13 Therefore, the Company’s proposal does more than simply eliminate the price differential
14 between gasoline and electric vehicle charging, it actually provides an additional subsidy to
15 drive the effective electric vehicle rate below the comparable price for gasoline.

16 In addition, the CCN Program will almost certainly constrain the development of EV
17 charging stations in Kansas by other entities, which will impact both innovation and
18 competition in Kansas. The CCN Program could also open the door for KCP&L to pursue
19 other anti-competitive activities, subsidized by ratepayers, on the basis that such activities
20 promote the public good. For all these reasons, I recommend that the KCC reject the

9 Testimony of Mr. Ives, page 10.

1 Company's proposed CCN Program at this time.

2

3 **D. Questions Delineated in Commission Order**

4 **Q. Do any general conflicts exist between current Kansas policy and utility implementation**
5 **of EV charging stations?**

6 A. Potentially. To the extent that Kansas promotes competition, then obviously the proposed
7 program would conflict with current Kansas policy. As discussed above, the CCN Program
8 will hinder the development of a competitive EV charging station market in the State, will
9 place KCP&L in the role of a public policy maker, and will result in cross-subsidization. In
10 addition, if the Company's proposal is accepted, Kansas ratepayers will be subsidizing not
11 only EV users of KCP&L, but EV users from other utilities and from other States.

12 With regard to public policy, Mr. Caisley states on page 11 of his testimony that "by
13 deploying the CCN, KCP&L will get hard data on adoption, standards, customer experience
14 and grid impacts. All of which can be used to inform state law and regulatory policy in
15 Kansas, proactively rather than waiting until EV adoption increases and utilities and
16 regulators have to react." But what Mr. Caisley fails to state is that by the time EV adoption
17 increases, the Company will already be firmly entrenched as the principal provider of EV
18 charging stations, and Kansas ratepayers will be providing subsidies that are well below
19 comparable gasoline costs to EV users. The Company's proposal therefore raises serious
20 public policy concerns.

21

1 **Q. Should a regulated electric public utility be allowed to enter a potentially competitive**
2 **marketplace?**

3 A. A regulated utility should not be able to utilize its monopoly powers in order to cross-
4 subsidize competitive business ventures. This would result in ratepayers paying rates that are
5 higher than necessary and could have a chilling effect on the marketplace itself. If a service is
6 to be offered on a competitive basis, then the entrants to the market should be entering that
7 market on a level playing field. This is obviously not possible if one of the entrants is a
8 regulated monopoly that is using its regulated subscriber base to subsidize the competitive
9 activity.

10

11 **Q. Do utility-provided EV charging stations result in cross-subsidization leading to rates**
12 **that are unreasonably discriminatory or unduly preferential?**

13 A. I believe that the Company's proposal does result in cross-subsidization that leads to rates that
14 are unreasonably discriminatory or unduly preferential in this case. While the Company has
15 stated that it is not uncommon for some customers to subsidize others, in this case you have a
16 situation whereby beneficiaries of the service may be not customers of KCP&L at all. This is
17 because there is no way to ensure that the users of the CCN Program are customers of KCP&L
18 or even customers of another Kansas electric utility. The result in that under the Company's
19 proposal, Kansas ratepayers will be subsidizing, in some cases, residents of other states that
20 are simply passing through the State of Kansas. In addition, the resulting subsidies do not
21 simply put EV charging on a comparable basis to gasoline vehicles, but make EV charging

1 even cheaper, equating to gasoline prices of \$1.34 to \$1.42 per gallon. From a public policy
2 perspective, these subsidies in my opinion are unreasonably discriminatory and unduly
3 preferential.

4
5 **Q. Do utility-provided EV charging stations serve the public interest?**

6 A. The Company has argued that EV charging station provide public benefits. While this may be
7 true, the KCC must consider if these benefits outweigh the detriment of having monopoly
8 ratepayers subsidizing the service, not only for EV users who are Kansas residents but for
9 other EV users as well. Moreover, while there may be public benefits of EV charging
10 stations, such as environmental benefits and lower carbon emissions, there are undoubtedly
11 detriments that the Company has not considered, such as the chilling effect on competition.

12 In addition, another possible detriment is the long-term impact of placing the utility in
13 the role of driving public policy. The KCC needs to decide if the utility should be in the
14 business of determining public policy, or if this role should be left to the Legislature. I
15 contend that it is not the utility's function to take actions to promote public policy unless such
16 actions are required by the Legislature, who is ultimately responsible to the citizens of Kansas
17 for determining such policy. Permitting utilities to determine public policy can lead to a
18 slippery slope, especially given the incentive that utilities have to increase their rate base and
19 increase shareholder earnings.

20
21 **Q. What is the impact of charging stations on a utility's retail customers?**

1 A. This is very difficult question to answer. The Company would have us believe that the impact
2 of the EV charging stations on the utility’s retail customers is small, and in fact the direct
3 costs of the program are relatively small. The Company estimates that the revenue
4 requirement of the CCN Program is approximately \$1.2 million. Given that total Kansas
5 revenues are approximately \$578 million, the direct financial impact on customers is small.

6 However, there are other costs that the Company has not quantified. For example, the
7 EPRI study indicates that the CCN Program could result in the need for further upgrades of
8 the distribution system that have not yet been identified. Other costs include the long-term
9 impact on competition and the costs of locking Kansas into a technology that could be
10 obsolete in just a few years. These costs have not been reflected in the Company’s analysis
11 but could be much more significant than the direct costs of the program identified to date.

12

13 **Q. What is the impact of charging stations on a utility’s distribution system?**

14 A. As noted, above, at this point we don’t know. The Company states that there should be no
15 negative impact on the distribution system. But the ultimate impact is unknown. It will
16 depend on how robust the underlying system is in locations where EV charging stations are
17 located and on the patterns of usage. Mr. Caisley states that the Company will eventually
18 implement time of use rates or demand response programs for EV charging stations in order to
19 mitigate any negative impacts on the distribution system, but he acknowledges that the exact
20 impact of charging stations is unknown. In fact, he states on page 17 of his testimony that
21 KCPL&L is “defining standards and guidelines for EV charging station installation that will

1 help ensure that future stations are not disruptive to the distribution system.” However, he
2 also claims that without the CCN Program, “EV charging stations present an unknown and
3 potential threat to the distribution system.”

4
5 **Q. What pricing alternatives should be considered for electric vehicle charging stations like**
6 **KCP&L’s Clean Charge Network?**

7 A. If the Commission authorizes KCP&L to implement the CCN Program, then it could require
8 the EV users to pay all direct costs of the program. We asked KCP&L to estimate the
9 required tariff rate or session charge that would be required under this scenario in CURB-46.
10 KCP&L responded that it has not calculated the required rates, assuming that the EV users
11 paid all the costs of the program.

12 Another possibility is that the KCC could approve the CCN Program but could require
13 shareholders to fund all or a portion of the cost. If the KCC believes that there are public
14 policy considerations that outweigh the detriments of the CCN Program, then it may be
15 reasonable for shareholders to also fund a portion of the program, since the resulting “public
16 good” is being served.

17 There are also small changes that the KCC could authorize. For example, the
18 Company indicated in response to CURB-6 that a portion of the cost would qualify for a
19 federal tax credit of 30%. While tax credits are usually normalized over the life of the
20 resulting investment, the Company indicated in response to CURB-8 that normalization was
21 not required by the IRS for tax credits associated with the CCN Program. Therefore, the KCC

1 could authorize these tax credits to be flowed-through to ratepayers rather than normalized,
2 which would provide ratepayers with the benefits sooner than the normalization methodology.
3 CURB would be open to exploring other pricing alternatives that may be recommended by
4 other parties, as long as such proposals do not result in further financial burden on captive
5 electric customers.

6
7 **E. Conclusions and Recommendations**

8 **Q. Please summarize your conclusions and recommendations.**

9 A. The Company's proposal is premature. KCP&L has not demonstrated that the CNN Program
10 is needed in Kansas at this time. In addition, as proposed, the CCN Program results in cross
11 subsidization, will hinder the development of a competitive market, will lock ratepayers into a
12 technology that may soon be obsolete, and will put KCP&L into the position of public policy
13 maker. The CCN program will unnecessarily increase rates for electric service Kansas while
14 enhancing shareholder earnings. For all these reasons, I recommend that the KCC reject the
15 Company's CCN Program and related cost recovery proposal.

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

18 A. Yes, it does.

19

VERIFICATION

STATE OF CONNECTICUT)

COUNTY OF FAIRFIELD) ss:

Andrea C. Crane, being duly sworn upon her oath, deposes and states that she is a consultant for the Citizens' Utility Ratepayer Board, that she has read and is familiar with the foregoing Direct Testimony, and that the statements made herein are true to the best of her knowledge, information and belief.

Andrea C. Crane
Andrea C. Crane

Subscribed and sworn before me this 2nd day of June, 2016.

Notary Public

Benjamin D Cotton

BENJAMIN D COTTON
Notary Public-Connecticut
My Commission Expires
June 30, 2017

My Commission Expires: _____

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Kansas City Power and Light Company	E	Kansas	16-KCPE-160-MIS	6/16	Clean Charge Network	Citizens' Utility Ratepayer Board
Kentucky American Water Company	W	Kentucky	2016-00418	5/16	Revenue Requirements	Attorney General/LFUCG
Black Hills/Kansas Gas Utility Company	G	Kansas	16-BHCG-171-TAR	3/16	Long-Term Hedge Contract	Citizens' Utility Ratepayer Board
General Investigation Regarding Accelerated Pipeline Replacement	G	Kansas	15-GIMG-343-GIG	1/16	Cost Recovery Issues	Citizens' Utility Ratepayer Board
Public Service Company of New Mexico	E	New Mexico	15-00261-UT	1/16	Revenue Requirements	Office of Attorney General
Atmos Energy Company	G	Kansas	16-ATMG-079-RTS	12/15	Revenue Requirements	Citizens' Utility Ratepayer Board
El Paso Electric Company	E	New Mexico	15-00109-UT	12/15	Sale of Generating Facility	Office of Attorney General
El Paso Electric Company	E	New Mexico	15-00127-UT	9/15	Revenue Requirements	Office of Attorney General
Rockland Electric Company	E	New Jersey	ER14030250	9/15	Storm Hardening Surcharge	Division of Rate Counsel
El Paso Electric Company	E	New Mexico	15-00099-UT	8/15	Certificate of Public Convenience - Ft. Bliss	Office of Attorney General
Southwestern Public Service Company	E	New Mexico	15-00083-UT	7/15	Approval of Purchased Power Agreements	Office of Attorney General
Westar Energy, Inc.	E	Kansas	15-WSEE-115-RTS	7/15	Revenue Requirements	Citizens' Utility Ratepayer Board
Kansas City Power and Light Company	E	Kansas	15-KCPE-116-RTS	5/15	Revenue Requirements	Citizens' Utility Ratepayer Board
Comcast Cable Communications	C	New Jersey	CR14101099-1120	4/15	Cable Rates (Form 1240)	Division of Rate Counsel
Liberty Utilities (Pine Buff Water)	W	Arkansas	14-020-U	1/15	Revenue Requirements	Office of Attorney General
Public Service Electric and Gas Co.	E/G	New Jersey	EO14080897	11/14	Energy Efficiency Program Extension II	Division of Rate Counsel
Black Hills/Kansas Gas Utility Company	G	Kansas	14-BHCG-502-RTS	9/14	Revenue Requirements	Citizens' Utility Ratepayer Board
Public Service Company of New Mexico	E	New Mexico	14-00158-UT	9/14	Renewable Energy Rider	Office of Attorney General
Public Service Company of New Mexico	E	New Mexico	13-00390-UT	8/14	Abandonment of San Juan Units 2 and 3	Office of Attorney General
Atmos Energy Company	G	Kansas	14-ATMG-320-RTS	5/14	Revenue Requirements	Citizens' Utility Ratepayer Board
Rockland Electric Company	E	New Jersey	ER13111135	5/14	Revenue Requirements	Division of Rate Counsel
Kansas City Power and Light Company	E	Kansas	14-KCPE-272-RTS	4/14	Abbreviated Rate Filing	Citizens' Utility Ratepayer Board
Comcast Cable Communications	C	New Jersey	CR13100885-906	3/14	Cable Rates	Division of Rate Counsel
New Mexico Gas Company	G	New Mexico	13-00231-UT	2/14	Merger Policy	Office of Attorney General
Water Service Corporation (Kentucky)	W	Kentucky	2013-00237	2/14	Revenue Requirements	Office of Attorney General
Oneok, Inc. and Kansas Gas Service	G	Kansas	14-KGSG-100-MIS	12/13	Plan of Reorganization	Citizens' Utility Ratepayer Board
Public Service Electric & Gas Company	E/G	New Jersey	EO13020155 GO13020156	10/13	Energy Strong Program	Division of Rate Counsel
Southwestern Public Service Company	E	New Mexico	12-00350-UT	8/13	Cost of Capital, RPS Rider, Gain on Sale, Allocations	New Mexico Office of Attorney General
Westar Energy, Inc.	E	Kansas	13-WSEE-629-RTS	8/13	Abbreviated Rate Filing	Citizens' Utility Ratepayer Board

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Delmarva Power and Light Company	E	Delaware	13-115	8/13	Revenue Requirements	Division of the Public Advocate
Mid-Kansas Electric Company (Southern Pioneer)	E	Kansas	13-MKEE-447-MIS	8/13	Abbreviated Rate Filing	Citizens' Utility Ratepayer Board
Jersey Central Power & Light Company	E	New Jersey	ER12111052	6/13	Reliability Cost Recovery Consolidated Income Taxes	Division of Rate Counsel
Mid-Kansas Electric Company	E	Kansas	13-MKEE-447-MIS	5/13	Transfer of Certificate Regulatory Policy	Citizens' Utility Ratepayer Board
Mid-Kansas Electric Company (Southern Pioneer)	E	Kansas	13-MKEE-452-MIS	5/13	Formula Rates	Citizens' Utility Ratepayer Board
Chesapeake Utilities Corporation	G	Delaware	12-450F	3/13	Gas Sales Rates	Attorney General
Public Service Electric and Gas Co.	E	New Jersey	EO12080721	1/13	Solar 4 All - Extension Program	Division of Rate Counsel
Public Service Electric and Gas Co.	E	New Jersey	EO12080726	1/13	Solar Loan III Program	Division of Rate Counsel
Lane Scott Electric Cooperative	E	Kansas	12-MKEE-410-RTS	11/12	Acquisition Premium, Policy Issues	Citizens' Utility Ratepayer Board
Kansas Gas Service	G	Kansas	12-KGSG-835-RTS	9/12	Revenue Requirements	Citizens' Utility Ratepayer Board
Kansas City Power and Light Company	E	Kansas	12-KCPE-764-RTS	8/12	Revenue Requirements	Citizens' Utility Ratepayer Board
Woonsocket Water Division	W	Rhode Island	4320	7/12	Revenue Requirements	Division of Public Utilities and Carriers
Atmos Energy Company	G	Kansas	12-ATMG-564-RTS	6/12	Revenue Requirements	Citizens' Utility Ratepayer Board
Delmarva Power and Light Company	E	Delaware	110258	5/12	Cost of Capital	Division of the Public Advocate
Mid-Kansas Electric Company (Western)	E	Kansas	12-MKEE-491-RTS	5/12	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Atlantic City Electric Company	E	New Jersey	ER11080469	4/12	Revenue Requirements	Division of Rate Counsel
Mid-Kansas Electric Company (Southern Pioneer)	E	Kansas	12-MKEE-380-RTS	4/12	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Delmarva Power and Light Company	G	Delaware	11-381F	2/12	Gas Cost Rates	Division of the Public Advocate
Atlantic City Electric Company	E	New Jersey	EO11110650	2/12	Infrastructure Investment Program (IIP-2)	Division of Rate Counsel
Chesapeake Utilities Corporation	G	Delaware	11-384F	2/12	Gas Service Rates	Division of the Public Advocate
New Jersey American Water Co.	W/WW	New Jersey	WR11070460	1/12	Consolidated Income Taxes Cash Working Capital	Division of Rate Counsel
Westar Energy, Inc.	E	Kansas	12-WSEE-112-RTS	1/12	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Puget Sound Energy, Inc.	E/G	Washington	UE-111048 UG-111049	12/11	Conservation Incentive Program and Others	Public Counsel
Puget Sound Energy, Inc.	G	Washington	UG-110723	10/11	Pipeline Replacement Tracker	Public Counsel
Empire District Electric Company	E	Kansas	11-EPDE-856-RTS	10/11	Revenue Requirements	Citizens' Utility Ratepayer Board
Comcast Cable	C	New Jersey	CR11030116-117	9/11	Forms 1240 and 1205	Division of Rate Counsel
Artesian Water Company	W	Delaware	11-207	9/11	Revenue Requirements Cost of Capital	Division of the Public Advocate

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Kansas City Power & Light Company	E	Kansas	10-KCPE-415-RTS (Remand)	7/11	Rate Case Costs	Citizens' Utility Ratepayer Board
Midwest Energy, Inc.	G	Kansas	11-MDWE-609-RTS	7/11	Revenue Requirements	Citizens' Utility Ratepayer Board
Kansas City Power & Light Company	E	Kansas	11-KCPE-581-PRE	6/11	Pre-Determination of Ratemaking Principles	Citizens' Utility Ratepayer Board
United Water Delaware, Inc.	W	Delaware	10-421	5/11	Revenue Requirements Cost of Capital	Division of the Public Advocate
Mid-Kansas Electric Company	E	Kansas	11-MKEE-439-RTS	4/11	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
South Jersey Gas Company	G	New Jersey	GR10060378-79	3/11	BGSS / CIP	Division of Rate Counsel
Chesapeake Utilities Corporation	G	Delaware	10-296F	3/11	Gas Service Rates	Division of the Public Advocate
Westar Energy, Inc.	E	Kansas	11-WSEE-377-PRE	2/11	Pre-Determination of Wind Investment	Citizens' Utility Ratepayer Board
Delmarva Power and Light Company	G	Delaware	10-295F	2/11	Gas Cost Rates	Attorney General
Delmarva Power and Light Company	G	Delaware	10-237	10/10	Revenue Requirements Cost of Capital	Division of the Public Advocate
Pawtucket Water Supply Board	W	Rhode Island	4171	7/10	Revenue Requirements	Division of Public Utilities and Carriers
New Jersey Natural Gas Company	G	New Jersey	GR10030225	7/10	RGGI Programs and Cost Recovery	Division of Rate Counsel
Kansas City Power & Light Company	E	Kansas	10-KCPE-415-RTS	6/10	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Atmos Energy Corp.	G	Kansas	10-ATMG-495-RTS	6/10	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Empire District Electric Company	E	Kansas	10-EPDE-314-RTS	3/10	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Delmarva Power and Light Company	E	Delaware	09-414 and 09-276T	2/10	Cost of Capital Rate Design Policy Issues	Division of the Public Advocate
Delmarva Power and Light Company	G	Delaware	09-385F	2/10	Gas Cost Rates	Division of the Public Advocate
Chesapeake Utilities Corporation	G	Delaware	09-398F	1/10	Gas Service Rates	Division of the Public Advocate
Public Service Electric and Gas Company	E	New Jersey	ER09020113	11/09	Societal Benefit Charge Non-Utility Generation Charge	Division of Rate Counsel
Delmarva Power and Light Company	G	Delaware	09-277T	11/09	Rate Design	Division of the Public Advocate
Public Service Electric and Gas Company	E/G	New Jersey	GR09050422	11/09	Revenue Requirements	Division of Rate Counsel
Mid-Kansas Electric Company	E	Kansas	09-MKEE-969-RTS	10/09	Revenue Requirements	Citizens' Utility Ratepayer Board
Westar Energy, Inc.	E	Kansas	09-WSEE-925-RTS	9/09	Revenue Requirements	Citizens' Utility Ratepayer Board
Jersey Central Power and Light Co.	E	New Jersey	EO08050326 EO08080542	8/09	Demand Response Programs	Division of Rate Counsel
Public Service Electric and Gas Company	E	New Jersey	EO09030249	7/09	Solar Loan II Program	Division of Rate Counsel
Midwest Energy, Inc.	E	Kansas	09-MDWE-792-RTS	7/09	Revenue Requirements	Citizens' Utility Ratepayer Board

<u>Company</u>	<u>Utility</u>	<u>State</u>	<u>Docket</u>	<u>Date</u>	<u>Topic</u>	<u>On Behalf Of</u>
Westar Energy and KG&E	E	Kansas	09-WSEE-641-GIE	6/09	Rate Consolidation	Citizens' Utility Ratepayer Board
United Water Delaware, Inc.	W	Delaware	09-60	6/09	Cost of Capital	Division of the Public Advocate
Rockland Electric Company	E	New Jersey	GO09020097	6/09	SREC-Based Financing Program	Division of Rate Counsel
Tidewater Utilities, Inc.	W	Delaware	09-29	6/09	Revenue Requirements Cost of Capital	Division of the Public Advocate
Chesapeake Utilities Corporation	G	Delaware	08-269F	3/09	Gas Service Rates	Division of the Public Advocate
Delmarva Power and Light Company	G	Delaware	08-266F	2/09	Gas Cost Rates	Division of the Public Advocate
Kansas City Power & Light Company	E	Kansas	09-KCPE-246-RTS	2/09	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Jersey Central Power and Light Co.	E	New Jersey	EO08090840	1/09	Solar Financing Program	Division of Rate Counsel
Atlantic City Electric Company	E	New Jersey	EO06100744 EO08100875	1/09	Solar Financing Program	Division of Rate Counsel
West Virginia-American Water Company	W	West Virginia	08-0900-W-42T	11/08	Revenue Requirements	The Consumer Advocate Division of the PSC
Westar Energy, Inc.	E	Kansas	08-WSEE-1041-RTS	9/08	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Artesian Water Company	W	Delaware	08-96	9/08	Cost of Capital, Revenue, New Headquarters	Division of the Public Advocate
Comcast Cable	C	New Jersey	CR08020113	9/08	Form 1205 Equipment & Installation Rates	Division of Rate Counsel
Pawtucket Water Supply Board	W	Rhode Island	3945	7/08	Revenue Requirements	Division of Public Utilities and Carriers
New Jersey American Water Co.	W/WW	New Jersey	WR08010020	7/08	Consolidated Income Taxes	Division of Rate Counsel
New Jersey Natural Gas Company	G	New Jersey	GR07110889	5/08	Revenue Requirements	Division of Rate Counsel
Kansas Electric Power Cooperative, Inc.	E	Kansas	08-KEPE-597-RTS	5/08	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Public Service Electric and Gas Company	E	New Jersey	EX02060363 EA02060366	5/08	Deferred Balances Audit	Division of Rate Counsel
Cablevision Systems Corporation	C	New Jersey	CR07110894, et al..	5/08	Forms 1240 and 1205	Division of Rate Counsel
Midwest Energy, Inc.	E	Kansas	08-MDWE-594-RTS	5/08	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Chesapeake Utilities Corporation	G	Delaware	07-246F	4/08	Gas Service Rates	Division of the Public Advocate
Comcast Cable	C	New Jersey	CR07100717-946	3/08	Form 1240	Division of Rate Counsel
Generic Commission Investigation	G	New Mexico	07-00340-UT	3/08	Weather Normalization	New Mexico Office of Attorney General
Southwestern Public Service Company	E	New Mexico	07-00319-UT	3/08	Revenue Requirements Cost of Capital	New Mexico Office of Attorney General
Delmarva Power and Light Company	G	Delaware	07-239F	2/08	Gas Cost Rates	Division of the Public Advocate
Atmos Energy Corp.	G	Kansas	08-ATMG-280-RTS	1/08	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board

CERTIFICATE OF SERVICE

16-KCPE-160-MIS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 6th day of June, 2016, to the following parties:

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