

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of a Working Case to Evaluate	)	
Potential Mechanisms for Facilitating	)	<b><u>File No. EW-2019-0229</u></b>
Installation of Electric Vehicle Charging	)	
Stations	)	

**RESPONSE OF KANSAS CITY POWER & LIGHT COMPANY  
AND KCP&L GREATER MISSOURI OPERATIONS COMPANY  
TO COMMISSION ORDER**

COME NOW Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively, the “Company”) and respectfully state as follows to the Missouri Public Service Commission (“Commission”):

**I. BACKGROUND**

1. On February 7, 2019, the Commission issued a *Notice Opening File* to open this docket to gather information for the purpose of evaluating potential mechanisms for facilitating the installation of electric vehicle charging stations.

2. On February 14, 2019, the Commission issued its Order Opening a Working Case Regarding EV Charging Stations and Directing Staff to Schedule a Workshop Meeting for the purpose of evaluating potential mechanisms for facilitating the installation of electric vehicle charging stations.

3. On February 15, 2019 Staff for the Commission (“Commission”) filed a *Notice of Workshop* in this docket, requesting that the first workshop take place on March 21, 2019 from 9 a.m. to 3 p.m. at the Commission.

4. On March 5, 2019, Staff filed a Request for Party Submissions (“Staff’s Request”) in this docket, requesting that parties file comments regarding which costs identified by Staff should be eligible for subsidization by utilities or should be eligible for special tariff/accounting/ratemaking treatment under a “make ready” approach.

5. On March 6, 2019, the Commission issued its *Order Inviting Workshop Participants to File Responses and Notice of Scheduled Workshop Meeting* (“Order”). In its Order, the Commission formalized both Staff’s deadline for party comments and requested workshop date.

## **II. COMPANY RESPONSE TO STAFF QUESTIONS**

6. This section provides the Company’s response at Staff’s questions as to which of the costs should be eligible for subsidization by utilities or eligible for special tariff/accounting/rate treatment under a ‘make ready’ approach.

### **A. Internal Utility Costs**

a. Necessary Distribution/Transmission system upgrades to existing infrastructure  
b. Internal utility costs of distribution extension as allocated  
c. Distribution equipment from existing infrastructure to service drop  
d. Transformer at service drop  
e. Service drop  
f. Meter  
g. Capitalized labor associated with the above  
h. Property taxes associated with the above  
i. Insurance associated with the above

7. The Company believes all the listed Internal Utility Costs should be eligible for subsidization by utilities or eligible for special tariff/accounting/ratemaking treatment. However, to remain fair and equitable to all customers, there should be a limit to the amount of Internal Utility Costs for each installation that are eligible for subsidization or special treatment.

8. The identified Internal Utility Costs are all utility plant and would all be considered elements of a line extension and subject to the Company’s line extension tariffs. Customers requesting a new service (or service upgrade) are provided a construction allowance per the provisions of the tariff. Each utilities line extension tariffs should include a uniform method for determining an appropriate construction allowance for separately metered EV charging service providers. We have previously discussed the Company’s approach under the EV Charging Line Extension Allowance. For unique programs, like Ameren’s Charge Ahead Corridor Program, other

methods, like a reverse auction process for site selection, would also be a method for determining the appropriate level of line extension costs to be subsidized by ratepayers.

#### B. Customer Costs

a. Customer's portion of construction allowance b. Infrastructure from meter to charger c. Charger d. Charger installation e. Charger awning/kiosk construction f. Site engineering - electrical design work for charging facilities g. Pavement of charging area h. Other non-Charger electrical (lighting, kiosk) i. Other on-site service connections (service line to C store, restrooms) j. Other on-site construction (C store, restrooms) k. Construction and/or pavement of access from public roadway l. Pavement of parking not in charging area m. Site drainage n. Site engineering - electrical design work for non-charging facilities o. Site engineering - pavements, drainage p. Permitting of civil engineering of site q. Permitting of charger installation r. Engineering/permitting of other non-Charger electrical (lighting, kiosk) s. Engineering/permitting of other non-Charger electrical (C store, restrooms) t. Land cost u. Land acquisition cost (title, etc.) v. Land acquisition process cost (real estate search and evaluation) w. Capitalized labor associated with any of the above x. Property taxes associated with any of the above y. Insurance associated with any of the above.

9. The Company believes all of the listed Customer Costs, and others, could potentially be eligible for subsidization by utilities or eligible for special tariff/accounting/ratemaking treatment. It is premature to make any such determination as it should be made in conjunction with a specifically proposed utility EV Charging program or product.

10. The transportation electrification industry is in its early stages of development and continues to evolve. Currently the focus is on light duty EV charging requirements at home, workplace, and along long-distance corridors. But, other transportation charging requirements continue and new opportunities will arise. Transportation electrification for Public transit, commercial delivery, and shared mobility solutions continue to evolve and may require investments in infrastructure that cannot be identified today.

11. The Company believes it is appropriate to subsidize EV charging stations co-located with host/customer commercial businesses to facilitate EV adoption, but these subsidies should not

subsidize portions of the customers other commercial operations or promote excessive utility infrastructure investments.

WHEREFORE, the Company respectfully request the Commission and Staff consider its response.

Respectfully submitted,

***Roger W. Steiner***

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**ATTORNEYS FOR KANSAS CITY  
POWER & LIGHT COMPANY AND  
KCP&L GREATER MISSOURI  
OPERATIONS COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 14<sup>th</sup> day of March 2019.

***Roger W. Steiner***

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