

Exhibit No. 102

Staff – Exhibit 102
Testimony of Sarah L.K. Lange
Surrebuttal
File No. ET-2024-0182

Exhibit No.:
Issue(s): *Subscriber Solar Tariff*
Witness: *Sarah L.K. Lange*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Surrebuttal Testimony*
Case No.: *ET-2024-0182*
Date Testimony Prepared: *March 22, 2024*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRIAL ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

SURREBUTTAL TESTIMONY

OF

SARAH L.K. LANGE

EVERGY METRO, INC. & EVERGY MISSOURI WEST, INC.

CASE NO. ET-2024-0182

Jefferson City, Missouri
March 2024

**TABLE OF CONTENTS OF
SURREBUTTAL TESTIMONY**

OF

SARAH L.K. LANGE

EVERGY METRO, INC. & EVERGY MISSOURI WEST, INC.

CASE NO. ET-2024-0182

1
2
3
4
5
6
7
8
9
10

EXECUTIVE SUMMARY1
EVERGY’S NEWLY-REQUESTED INCLUSION OF RTOU-EV2
CONCLUSION.....3

1 **SURREBUTTAL TESTIMONY**

2 **OF**

3 **SARAH L.K. LANGE**

4 **EVERGY MISSOURI METRO, INC. & EVERGY MISSOURI WEST, INC.**

5 **CASE NO. ET-2024-0182**

6 Q. Are you the same Sarah L.K. Lange who filed direct and rebuttal testimony in
7 this matter?

8 A. Yes.

9 **EXECUTIVE SUMMARY**

10 Q. What is the purpose of your surrebuttal testimony?

11 A. I respond to the rebuttal testimony of Bradley D. Lutz filed on March 13, 2023,
12 on behalf of Evergy Missouri Metro and Evergy Missouri West in which he proposes expanding
13 an optional add-on separately-metered electric vehicle charging rate plan to customers taking
14 service on the Solar Subscription Rider (Program) (“SSP”) tariffs of each utility.

15 Mr. Lutz’s rebuttal also expresses concern with the complexity of Staff’s recommended
16 billing procedures. As my rebuttal addressed the inherent complexity of the SSP and noted that
17 billing complexity may be necessary to reflect the complexity of Evergy’s program designs,
18 I will not restate that discussion here. Mr. Lutz’s rebuttal also provides slightly more detail
19 concerning Evergy’s proposed billing treatments for SSP participants. My concerns with the
20 failure of those billing provisions to reasonably net monthly energy consumption were
21 addressed in my rebuttal, so I will not restate them here.

1 **EVERGY'S NEWLY-REQUESTED INCLUSION OF RTOU-EV**

2 Q. At page 11, Mr. Lutz testifies that recommended billing provisions
3 “would also apply to the Company’s Nights & Weekends Plan – Residential Time of Use –
4 Three Period, Schedule RTOU and **EV Only Plan – Separately Metered Electric Vehicle**
5 **Time of Use, Schedule RTOU-EV.**” [emphasis added]

6 Is Mr. Lutz’s surrebuttal testimony consistent with the tariff filed December 1, 2023 and
7 Mr. Lutz’s direct testimony filed February 20, 2024?

8 A. No, it is not. The suspended tariff does not include billing treatment for
9 Schedule RTOU-EV. Mr. Lutz’s direct testimony did not propose to modify Evergy’s proposed
10 tariff to include RTOU-EV.

11 Q. Does Mr. Lutz’s testimony discuss why it now proposes to include the
12 RTOU-EV rate plan as an option for SSP participants?

13 A. No.

14 Q. Is it reasonable to include RTOU-EV as a rate plan in which SSP customers may
15 participate?

16 A. No. The RTOU-EV rate plan is essentially an add-on plan for customers who
17 install a second meter connected only to EV charger load. Staff’s concerns since
18 January of 2023 have been that customers who are already SSP participants (1) be billed
19 appropriately on the default residential rate, and (2) have the level of optionality the
20 Commission determines appropriate so that they do not flee the SSP program and shift costs
21 and risks to non-participants. The RTOU-EV rate plan is a new service type and service on the
22 RTOU-EV rate plan cannot be established for an existing customer with existing usage.
23 Because becoming an RTOU-EV customers requires setting a new meter and establishing a

1 new service, there is no concern that an existing SSP participant would be negatively impacted
2 by SPP participation serving as a barrier to becoming a customer on RTOU-EV.

3 Q. In your rebuttal you noted because RTOU customers were previously excluded
4 from participation in the SSP, the Commission could reach a different conclusion for treatment
5 of RTOU customers than for customers taking service on more-differentiated rate schedules.

6 Does Staff's position on RTOU-EV follow the same logic?

7 A. Yes.

8 Q. Does Mr. Lutz discuss why he would allow SSP participation for RTOU-EV
9 service?

10 A. He does not.

11 Q. Does Mr. Lutz discuss why he has added this option in rebuttal?

12 A. He does not.

13 Q. Does Mr. Lutz clarify how any SSP participation would be demarcated between
14 a participant's RTOU-EV usage and a participant's regular electric service?

15 A. No, he does not. Splitting a tranche of SSP participation between RTOU-EV
16 usage and usage on some other rate schedule certainly would add billing complexity,
17 and requiring separate SSP participations for service under each rate schedule would cause
18 unreasonable customer confusion, and risks of misaligning usage and SSP participation
19 between months of the year and rate plans.

20 **CONCLUSION**

21 Q. Does this conclude your surrebuttal testimony?

22 A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc. d/b/a)
Evergy Missouri Metro's and Evergy Missouri) Case No. ET-2024-0182
West, Inc. d/b/a Evergy Missouri West's Solar)
Subscription Rider Tariff Filings)

AFFIDAVIT OF SARAH L.K. LANGE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW SARAH L.K. LANGE and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Surrebuttal Testimony of Sarah L.K. Lange*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Sarah L.K. Lange

SARAH L.K. LANGE

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 19th day of March 2024.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070

D. Suzie Mankin

Notary Public