# Testimony of Scott Jones
# On Behalf of KCP&L and Westar Energy
# Before the House Energy, Utilities and Telecommunication Committee
# Neutral for HB 2166
# February 15, 2017

Chairman Seiwert and members of the committee, thank you for the opportunity to address this important issue and its related industry on behalf of KCP&L and Westar Energy. The electric vehicle (EV) customer market is growing and evolving in this country and right along with that is the need for public charging station infrastructure required to power the vehicles. To accommodate this growing need in our service territory and to overcome the lack of EV charging station infrastructure, KCP&L initiated a Clean Charge Network (CCN) of 1,000 EV charging stations throughout our service territory.

This proposed legislation modifies the Kansas Retail Electric Supplier's Act (RESA) to allow private, non-utility entities to own and operate EV charging stations in Kansas including charging end-use customers directly for the electricity consumed through use of the charging stations.

At this time, KCP&L has concerns with deregulating EV charging stations in Kansas for two reasons 1) we recommend regulators gather more information for analysis before charging stations are deployed randomly across the state in a cherry-picked fashion by unregulated entities in this evolving industry; and 2) this proposed legislation does not allow electric public utilities a level playing field in that public utilities are required to serve the underprivileged regions in our certified territories while unregulated entities may install EV charging stations in more desirable locations.

In time we expect enough information will be gathered by KCP&L's Clean Charge Network and shared with regulators so that informed forecasts can be made for deployment requirements of the new, evolving EV customer market. Such data will be beneficial in determining the design and language for crafting legislation for the EV charging station infrastructure that make sense for Kansans.

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As part of the CCN, we are defining standards and guidelines for EV charging station installation that will help ensure that future stations are not disruptive to the distribution system. With more than 1,000 stations deployed in our service territory, KCP&L will have the most robust set of charging data in the U.S. This will help ensure that future deployment, whether as part of an expanded CCN or from third parties, is done in a manner that does not jeopardize reliability, minimizes cost and supports accessibility for all customers in our service territory.

Because KCP&L designed and is deploying the CCN unlike other parties, we will be able to utilize the information gleaned from its deployment to maximize value to the grid and to minimize future cost. This information will be made available to state regulators, elected policymakers and third parties. The CCN is a smart system. This means that KCP&L can set it to reduce or eliminate charging in a peak demand situation. This can be done to the entire network or just to a feeder that is at a critical load level. Since it is a network, the CCN will eventually have time-of-use and demand response programs available system wide to minimize demand during peak load time periods. All of this helps minimize cost and improve reliability for the distribution grid. In addition, the CCN is set up so that we can pilot vehicle-to-grid discharge later in the project. This will provide information on the viability of EVs as distributed and cost-effective storage on the electrical grid.

Without the experience and real-world data derived from the CCN, EV charging stations present an unknown and potential threat to the distribution system. The CCN will help turn that potential threat into an opportunity to improve the long-term cost and reliability of the electrical grid.

KCP&L and Westar Energy are committed to supporting legislation that would allow third party installation and charge end-use customers. However, it needs to be based on broad coalition support, be fair to all electric customers, not threaten grid stability or drive increased customer costs and create an equal playing field between third party installers, charging station manufacturers and electric utilities.

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