

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

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri) File No. ET-2018-0132
for Approval of Efficient Electrification Program.)

**LIST OF ISSUES, LIST AND ORDER OF WITNESSES,
ORDER OF OPENING STATEMENTS AND
ORDER OF CROSS-EXAMINATION**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") on behalf of itself, the Staff of the Missouri Public Service Commission ("Staff"), the Office of the Public Counsel ("OPC"), Kansas City Power & Light Company ("KCPL"), Kansas City Power & Light Company – Greater Missouri Operations ("GMO"), Missouri Division of Energy ("DE"), Missouri Industrial Energy Consumers ("MIEC"), Natural Resources Defense Council ("NRDC"), Spire Missouri, Inc. ("Spire"), Empire District Electric Company ("Empire") and the Sierra Club,¹ known collectively herein as "the Parties," and hereby submits the following *List of Issues, List and Order of Witnesses, Order of Opening Statements and Order of Cross-Examination*:

LIST OF ISSUES

1. Should the Commission approve, reject, or modify Ameren Missouri's Charge Ahead – Electric Vehicles Program?
 - a. Has Ameren Missouri provided sufficient evidence that there is a need for the program?
 - b. Has Ameren Missouri provided sufficient evidence that the program is cost effective?

¹ Counsel for Ameren Missouri has not heard back from ChargePoint or Renew Missouri, but have no reason to believe they oppose this pleading.

- c. If the program is approved, what is the appropriate cost recovery mechanism?
 - d. If the program is approved, what conditions, if any, should be imposed by the Commission?
- 2. Should the Commission approve, reject, or modify Ameren Missouri's Charge Ahead – Business Solutions Program?
 - a. Has Ameren Missouri provided sufficient evidence that there is a need for the program?
 - b. Has Ameren Missouri provided sufficient evidence that the program is cost effective?
 - c. If the program is approved, what is the appropriate cost recovery mechanism?
 - d. If the program is approved, what conditions, if any, should be imposed by the Commission?
- 3. Should the Commission grant the variances requested by Ameren Missouri?

Order of Opening Statements

Ameren Missouri
Renew Missouri
ChargePoint
Sierra Club
NRDC
KCPL
GMO
Empire
Spire
MIEC
DE
OPC
Staff

List and Order of Witnesses

Company Witnesses:

Tom Byrne
Patrick Justis
David Pickles
Steven Wills

Renew Missouri Witness:

James Owen

ChargePoint Witness:

James Ellis

DE Witness:

Cherylyn Kelley

OPC Witness:

Geoff Marke

Staff Witnesses:

Byron Murray
Sarah Lange
Mark Oligschlaeger
Robin Kliethermes

Order of Cross-Examination

Ameren Missouri Witnesses

Renew Missouri
ChargePoint
Sierra Club
NRDC
KCPL
GMO
Empire
Spire
MIEC
DE
OPC
Staff

Staff Witnesses

OPC
DE
MIEC
Spire
Empire
GMO
KCPL
NRDC
Sierra Club
ChargePoint
Renew Missouri
Ameren Missouri

OPC Witnesses

Staff
DE
MIEC
Spire
GMO
KCPL
NRDC
Sierra Club
ChargePoint
Renew Missouri
Ameren Missouri

Renew Missouri Witnesses

Ameren Missouri
ChargePoint
Sierra Club
NRDC
KCPL
GMO
Empire
Spire
MIEC
DE
OPC
Staff

DE Witnesses

Staff
OPC
MIEC
Spire
Empire
GMO
KCPL
NRDC
Sierra Club
ChargePoint
Renew Missouri
Ameren Missouri

WHEREFORE, Ameren Missouri prays on behalf of the Parties that the Commission will accept this *List of Issues, List and Order of Witnesses, Order of Opening Statements and Order of Cross-Examination*; and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Wendy K. Tatro

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Attorneys for Ameren Missouri

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 20th day of November, 2018, to all counsel of record.

/s/ Wendy K. Tatro _____