

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

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

**ADDITIONAL COMMENTS OF
UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), and provides these *Additional Comments* in response to the Missouri Public Service Commission's ("Commission") March 22, 2019 *Order Inviting Comments* ("*Order*"), including responses to specific topics suggested in the Commission Staff's ("Staff") *Request for Additional Comments*.

1. Ameren Missouri appreciates the opportunity to provide additional written comments in this workshop. The Company will respond to the request for comments submitted by Staff, but also feels that it is important to strongly emphasize three points in particular: That a holistic charging ecosystem is vital for increasing electric vehicle ("EV") adoption rates; that utility incentives can be a driving force in creating and sustaining that holistic charging ecosystem; and that customer education is also vital to successful adoption, regardless of the charging system model utilized. These three concepts were integral parts of the Company's Charge Ahead proposal in File No. ET-2018-0132.

• **Holistic Charging Ecosystem**

- *Four-part system.* A holistic charging ecosystem provides all four key types of charging options – home (single and multifamily), workplace, public around town, and long distance corridor.

- *Accessibility.* Accessibility to charging at home, at work, while out running errands, and while on long distance trips all work together to instill confidence in the availability of charging options for a potential EV owner.
- *Cost Recovery.* Because four charging station types feed into this holistic charging ecosystem, the Commission should similarly employ a holistic point of view in how it establishes cost recovery for utility investments serving this market. As Ameren Missouri learned through its Request for Information process, all four components of the ecosystem work together to spur the market. So while one single charging station may not benefit all customers, a network of varied charging stations can most assuredly benefit all customers.
- **Utility Incentives**
 - *Necessary Incentives.* EV charging investors have indicated they need significant incentives to offset the charging equipment cost and potential demand charges in addition to no-cost line extensions.
 - *Flexibility.* Incentives can be implemented to provide maximum flexibility to work with the charging station host in order to garner the most benefits from charging station installations.
 - *Cost/Benefit.* If the provision of incentives, which leverage utility investments in combination with private third-party investments to reduce customer costs, spurs increased local EV adoption as anticipated, the benefits derived from new EV charging loads would more than pay for the costs of incentives reflected in customer rates.
- **Customer Education**
 - *Necessary Education.* Marketing, education, training, and other support are important parts of developing and operating a viable EV program. Customers, dealerships, and charging station trade allies and potential charging station hosts require education regarding the benefits of EV in order to understand why they should not only be adopting, but also promoting EV purchases and charging station installations.
 - *Utility-Provided Customer Education.* Utility-provided education for customers is an important component of consumer education. As the electric provider, the utility has the unique opportunity to reach and inform a broad, relevant audience.

2. Within the context of the above positions, Ameren Missouri also provides replies to the specific Staff-provided topics for discussion in Attachment 1 to these *Additional Comments*.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AMEREN MISSOURI

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