

April 29, 2019

Case No. 2019-0229: Request for Party Submissions
Regarding Electric Vehicle (EV) Charging Infrastructure

Missouri Public Service Commission (PSC):

The Missouri Corn Growers Association (MCGA) has long been at the forefront of clean energy policy and infrastructure development. We spearheaded former Sen. Jim Talent's legislation which put in place the Renewable Fuel Standard (RFS) and created the model for the farmer-owned ethanol plant cooperatives that spread like wildfire in the mid-2000s. MCGA understands the value of environmentally friendly fuels and vehicles and supports those efforts. There are three key public policy issues from our members to consider regarding electric vehicle (EV) charging:

1. Should investor-owned utilities have the opportunity to petition for rate increases impacting all of their customers to pay for the infrastructure of EV charging stations which benefit much fewer customers?
2. Should the Missouri Department of Agriculture's Division of Weights and Measures have jurisdiction over inspections of EV charging stations to ensure that consumers get exactly what they pay for as with the liquid motor fuels market?
3. How can we ensure the models for EV charging stations fairly pay into the state funds for Missouri's roads and bridges?

MCGA cannot support a scenario where monopoly utility companies can strap their ratepayers with the significant cost of installing infrastructure for EV charging stations. By nature as a monopoly, consumers do not have a choice where or how they obtain the electricity necessary for their homes, yet the utility appears to have the ability to request in a rate-making case that they charge said consumers more per month to pay for the EV infrastructure that few benefit from. It is unfair for utilities, public or otherwise, to be competing in the private sector against private sector motor fuel retailers especially for the cost to be passed on to consumers who will not benefit.

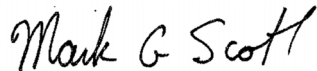
We oppose utility ratepayers being forced in any way to pay for or subsidize, either directly or indirectly, any portion of the EV charging station including the electricity, the lines, infrastructure, construction, or ongoing costs of the EV charging station. We oppose investor-owned utilities from receiving legislative or regulatory (PSC) authority to charge their ratepayers more every month to fund the infrastructure and construction of EV charging stations. This would allow utilities to socialize the costs and risk

associated with EV charging stations and competing in the private sector retail motor fuel market would be severely impacted.

Additionally, in the vein of fairness, we strongly feel that EV charging stations need oversight by the Missouri Department of Agriculture's Division of Weights and Measures and need an improved mechanism beyond alternative fuel decals to pay for the use of Missouri's road and bridges as the current alternative fuel decal does not equitably measure the impact of EVs on our state's highway infrastructure. The liquid fuels market has met these standards to pay for its fair share, and MCGA feels that other fuels should do the same.

MCGA would be happy to work with electric producers and other stakeholders to find better solutions for all consumers as well as to adequately pay for the state's roads and bridges.

Respectfully,

A handwritten signature in black ink that reads "Mark G. Scott". The signature is written in a cursive, slightly slanted style.

Mark Scott
President
Missouri Corn Growers Association