

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

In the Matter of the Application	)	
Of Union Electric Company	)	Case No. ET-2016-0246
d/b/a Ameren Missouri for Approval	)	
of a Tariff Setting a Rate for	)	Tracking No. YE-2017-0030
Electric Vehicle Charging Stations	)	

**LIST OR STATEMENT OF THE ISSUES SUBMITTED BY  
OFFICE OF PUBLIC COUNSEL, CHARGEPOINT, INC. MIDWEST ENERGY  
CONSUMERS GROUP AND CONSUMERS COUNCIL OF MISSOURI**

COMES NOW the Office of the Public Counsel (OPC), ChargePoint, Inc. (ChargePoint), Midwest Energy Consumers Group (MECG), Consumers Council of Missouri (“Consumers Council”) and, noting that parties have been unable to reach consensus on a List of Issues, respectfully hereby submit this separate list or statement of the issues:

**LIST OF ISSUES**

**1. Commission Jurisdiction**

Does the Commission have jurisdiction to regulate utility-owned and operated electric vehicle charging stations operated in a utility’s service area?

**2. Public Policy<sup>1</sup>**

A. Are there public benefits realized if the Commission approves Ameren Missouri’s proposal to installation of six electric vehicle charging stations in Ameren’s service territory?

B. Is Ameren acting as a regulated utility in offering this service?

---

<sup>1</sup> The other parties to this matter intend to file, or have filed, a statement of the issues which OPC, ChargePoint, MECG, and Consumers Council (“CCM”) assert does not reasonably define the issues the Commission must decide in this matter. Accordingly this separate expression of the issues is respectfully submitted to the Commission. OPC, ChargePoint, MECG and Consumers Council have no differences with the proposed Order Of Witnesses, Order Of Opening Statements and Order of Cross-Examination agreed to by the parties.

C. Does the pilot design proposed by Ameren, impact competition with third parties for charging station sites in its service territory?

3. **Costs**

Should the cost of installing the electric vehicle charging stations be booked below the line or above the line and recovered from ratepayers?

4. **Rates**

Does Ameren Missouri's proposed tariff represent the proper rate design for its EV charging station pilot project?

MIEC has indicated it agrees with this list of issues.

**WHEREFORE**, the Office of Public Counsel, ChargePoint, Inc., Midwest Energy Consumers Group, and Consumers Council of Missouri respectfully request the Commission accept this separate List or Statement of the Issues; and enter such other relief as the Commission deems just.

Respectfully submitted,

**/s/ Lera L. Shemwell**

Lera L. Shemwell  
Senior Counsel (#43792)  
P. O. Box 2230  
Jefferson City, MO 65102  
(573) 751-5565 (Telephone)  
(573) 751-5562 (Fax)  
[lera.shemwell@ded.mo.gov](mailto:lera.shemwell@ded.mo.gov)

Attorney for the Office of the Public Counsel

**/s/ Mark W. Comley**

Mark W. Comley #28847  
NEWMAN, COMLEY & RUTH P.C.  
601 Monroe Street, Suite 301  
P.O. Box 537  
Jefferson City, MO 65102-0537  
(573) 634-2266  
(573) 636-3306 (FAX)  
[comleym@ncrpc.com](mailto:comleym@ncrpc.com)

Attorneys for ChargePoint, Inc.

**/s/ David L. Woodsmall**

David L. Woodsmall (#40747)  
Woodsmall Law Office  
308 E. High Street, Suite 204  
Jefferson City, MO 65101  
(573) 636-6006  
(573) 636-6007 (FAX)  
[David.woodsmall@woodsmalllaw.com](mailto:David.woodsmall@woodsmalllaw.com)

Attorney for Midwest Energy Consumers' Group

**/s/ John B. Coffman**

John B. Coffman (MBE #36591)  
John B. Coffman, LLC  
871 Tuxedo Blvd.  
St. Louis, MO 63119-2044  
Ph: (573) 424-6779  
E-mail: [john@johncoffman.net](mailto:john@johncoffman.net)

Attorney for Consumers Council of Missouri

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via email on this 4<sup>th</sup> day of January, 2017, to:

General Counsels Office at [gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov);  
Nathan Williams at [Nathan.williams@psc.mo.gov](mailto:Nathan.williams@psc.mo.gov);  
Andrew Zellers at [andyzellers@brighergy.com](mailto:andyzellers@brighergy.com);  
John B. Coffman at [john@johncoffman.net](mailto:john@johncoffman.net);  
Alexander Antal at [alexander.antal@ded.mo.gov](mailto:alexander.antal@ded.mo.gov);  
Edward F. Downey at [efdowney@bryancave.com](mailto:efdowney@bryancave.com);  
Diana M. Vuylsteke at [dmvuylsteke@bryancave.com](mailto:dmvuylsteke@bryancave.com);  
Henry B. Robertson at [hrobertson@greatriverslaw.org](mailto:hrobertson@greatriverslaw.org);  
Russ Mitten at [rmitten@brydonlaw.com](mailto:rmitten@brydonlaw.com);  
Paula Johnson and Wendy Tatro at [AmerenMOService@ameren.com](mailto:AmerenMOService@ameren.com).

/s/ Lera L. Shemwell

---