

**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)

**PETITION OF MISSOURI PETROLEUM MARKETERS
& CONVENIENCE STORE ASSOCIATION FOR LEAVE
TO FILE AMICUS CURIAE BRIEF AND REQUEST FOR EXPEDITED RULING**

COMES NOW the Missouri Petroleum Marketers & Convenience Store Association (“MPCA”), on behalf of its members, and submits this Petition for Leave to File *Amicus Curiae* Brief and Request for Expedited Ruling in the above captioned case. In support thereof, MPCA states as follows:

1. Missouri Public Service Commission (“Commission”) Rule 4 CSR 240-2.075(11) states that any person may petition the Commission for leave to file an *amicus curiae* brief in a case to which the person is not a party. Pursuant to that rule, MPCA seeks to submit such a brief on two of the issues identified by the parties to this case in their List of Issues, List and Order of Witnesses, Order of Opening Statements, and Order of Cross-Examination [Dkt. 83].

2. MPCA is a nonprofit corporation created pursuant to Missouri law, with a principal office located at 205 East Capitol Avenue, Suite 200, Jefferson City, Missouri 65101. MPCA represents and is comprised of independent petroleum marketers and convenience store operators, petroleum suppliers and associated industry companies within the state of Missouri. MPCA’s members include gasoline and diesel fuel wholesalers, commissioned gasoline distributors, and gasoline reseller-retailers, many of which are small businesses, and which collectively employ thousands of Missouri citizens. Many of MPCA’s members are customers of Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”).

3. The proceeding concerns applications by Ameren Missouri for the Commission's approval to implement two new tariffed programs, collectively referred to as the "Charge Ahead Program," which include the Electric Vehicle Charging Infrastructure Incentive Program ("Charge Ahead – EV Program") and the Efficient Electrification Program ("Charge Ahead – BS Program"). Charge Ahead – EV Program is predicated on using rates paid by Ameren Missouri's customer base to reimburse Ameren Missouri for costs it incurs in the development, deployment, and operation of its electric vehicle charging stations. The Charge Ahead – BS Program is to incentivize third-party use of electric equipment in place of equipment fueled by propane, gasoline, or diesel.

4. Because Ameren Missouri seeks to compete with MPCA's members in the motor fuel market, MPCA is in a unique position to provide a legal perspective and background information to the Commission for its consideration of whether Ameren Missouri has provided sufficient evidence to show the Charge Ahead – EV and BS Programs are needed and cost effective; what, if any, cost recovery mechanisms may be appropriate for these Programs; and whether the Commission should impose any conditions on these Programs.

5. Should the Commission grant MPCA's petition for leave to file its *amicus curiae* brief, the brief must be filed no later than the filing of initial briefs by the parties. Rule 4 CSR 240-2.075(11). Pursuant to the Commission's Order Setting Procedural Schedule and Further Suspending Tariffs [Dkt. 46], initial post-hearing briefs are due to be filed by January 7, 2018. Due to this limited window and the impending holidays, MPCA requests the Commission rule on this petition as soon as possible to allow for thoughtful preparation of its brief.

WHEREFORE, for the foregoing reasons, MPCA respectfully requests that the Commission grant its Petition for Leave to file an *amicus curiae* brief, and, in any case, to rule on this Petition as soon as possible.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Petition for Leave to File *Amicus Curiae* Brief and Request for Immediate Ruling was served all parties participating in the Electronic Filing Information System on this 30th day of November, 2018.

 /s/ Jennifer S. Griffin
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