

**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) Case No. ET-2016-0246
For Approval of a Tariff Setting a Rate for)
Electric Vehicle Charging Stations.)

**MOTION OF CERTAIN INTERVENORS
TO CONSOLIDATE AMEREN MISSOURI RATE CASE
WITH AND AMEREN’S APPLICATION FOR APPROVAL
OF ELECTRIC VEHICLE CHARGING STATIONS**

COME NOW Intervenors, Office of the Public Counsel (“Public Counsel”), the Missouri Industrial Energy Consumers (“MIEC”), Consumers Council of Missouri (CCM”), and Midwest Energy Consumers Group (“MEGC”), (collectively “Intervenors”) and, for their Motion to Consolidate, respectfully state as follows:

1. On August 15, 2016, Ameren Missouri (“Ameren”) filed its Application for Approval of Tariff Authorizing A Pilot Program For Electric Vehicle Charging Stations.
2. In its Application Ameren seeks an order approving a tariff authorizing a pilot program to install and operate electric vehicle charging stations at specified locations within the Company’s service area. (Ameren App. pp. 1)
3. Ameren seeks to include the cost of charging sites, or “charging islands,” which would be available for use by the general public to charge electric vehicles.
4. No costs associated with the pilot project were included in the proposed revenue requirement in the Company's pending general rate case, File No. ER-2016-0179, although Ameren Missouri anticipates that some amount of investment related to the project may be added to rate base through the true-up process. Therefore, the Company's customers will provide a subsidy to the project through rates they pay for electric service.

5. These Intervenors request the Commission consolidate this tariff case with Ameren's current rate case.

6. There are questions concerning whether a competitive business designed to serve the general public and to gather information to benefit other electric utilities in the state should be paid for, even in small part, by Ameren's captive customers.

7. This is not a program designed to serve Ameren's ratepayers.

8. Instead, Ameren believes the pilot program might produce numerous benefits to the Company, the Commission, other Missouri utilities, and other parties interested in promoting and facilitating the use of electric vehicles. This type of program is the responsibility of Ameren's shareholders.

9. It is designed to experiment to see if electric vehicle charging stations can increase Ameren's profits by offering a competitive service. It is appropriate for shareholders and not captive customers to bear the risk of the success or failure of this experimental project.

10. In addition to the issues noted above, there are rate design concerns, and general revenue requirement concerns.

WHEREFORE these Intervenors request the Commission issue its Order consolidating this tariff case with Ameren's current rate case ER 2016-0179, and for any other relief the Commission deems appropriate.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 12th day of September 2016.

/s/ Lera Shemwell
