

**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)
for Approval of a Tariff Setting a Rate for)
Electric Vehicle Charging Stations.)

Case No. ET-2016-0246

MOTION TO MODIFY SCHEDULE AND FOR EXPEDITED CONSIDERATION

Under authority of, and in accordance with, 4 CSR 240-2.080, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “the Company”) requests an order modifying the filing schedule prescribed in the Commission’s June 7, 2017, *Order Rejecting Tariff Filing and Directing Filing* by extending the date for filing changes to the Company’s Resale of Service tariff and also for filing comments to those changes. In addition, because the filing date prescribed in the Commission’s order is June 9, 2017, Ameren Missouri requests expedited consideration of its motion.

1. In its *Order Rejecting Tariff Filing and Directing Filing*, the Commission directed the Company to “file a new tariff . . . consistent with the language proposed by Staff” no later than June 9, 2017.

2. Ameren Missouri seeks additional time to make any required tariff filing for the following reasons:

- Staff’s recommended tariff changes include language stating electricity sold by a third party for vehicle charging does not constitute “the resale of electricity.” That language is inconsistent with one or more arguments Ameren Missouri expressed in its May 17, 2017, *Application for Rehearing*. No change to the current tariff should be ordered until the Commission determines whether those arguments have merit.

- If the Commission grants Ameren Missouri's application, the Commission may also conclude the tariff changes Ameren Missouri has proposed – which specifically exempt vehicle charging stations from the Resale of Service tariff – are sufficient and should be approved in lieu of tariff changes recommended by Staff.
- Finally, if the Commission affirms its conclusion that electricity sold for the purpose of charging electric vehicles does not constitute resale of service, the Commission may want to reconsider whether any change to the Resale of Service tariff is necessary.

3. For the reasons stated in the preceding paragraph, the Company requests the Commission defer ordering changes to the Resale of Service tariff until after the Commission has ruled on the pending *Application for Rehearing*, and that comments by interested parties on such tariff changes be similarly deferred.

4. Finally, because the *Order Rejecting Tariff Filing and Directing Filing* requires Ameren Missouri to file tariff changes recommended by Staff on or before June 9, 2017, under authority of, and in accordance with, 4 CSR 240-2.080(14), Ameren Missouri requests expedited consideration of its motion to extend the tariff filing and comment schedule prescribed in that order. Such action is necessary to allow Ameren Missouri and other interested parties to comply with whatever schedule the Commission ultimately determines is reasonable. Because the Commission's *Order Rejecting Tariff Filing and Directing Filing* was issued on June 7, 2017, the Company represents its request for modification of the filing schedule and for expedited treatment reasonably could not have been filed any sooner.

WHEREFORE, for the reasons stated above, Ameren Missouri requests an order modifying the date it is required to file changes to its Resale of Service tariff until after the

Commission has ruled on the Company's pending *Application for Rehearing*. And because time is of the essence, the Company further requests such order be issued no later than close of business Thursday, June 8, 2017.

Respectfully submitted,

By: /s/ L. Russell Mitten_____

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**ATTORNEYS FOR UNION ELECTRIC
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing filing was served via e-mail on counsel for all parties of record on this 8th day of June, 2017.

/s/ L. Russell Mitten