

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

|   |   |                       |
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| In the Matter of a Working Case to Evaluate | ) |                       |
| Potential Mechanisms for Facilitating       | ) |                       |
| Installation of Electric Vehicle Charging   | ) | File No. EW-2019-0229 |
| Stations                                    | ) |                       |

**RENEW MISSOURI’S ADDITIONAL COMMENTS**

Renew Missouri appreciates the Commission’s interest in advancing Electric Vehicle (“EV”) infrastructure and the opportunity to provide additional comments. As the Commission moves forward with guidance on how Missouri stakeholders should proceed after this workshop, Renew Missouri urges all parties to work towards two goals:

- 1) developing a robust charging infrastructure to accommodate EVs, and
- 2) developing policies that ensure efficient use of the infrastructure.

During the workshop, the discussion focused on building out the EV charging station network in Missouri. As important as the charging station infrastructure is to EV adoption, efficient use of that system will be vital to its long-term success, and so, Renew Missouri offers comments on both goals.

Developing a Robust Charging Infrastructure

The Commission has recognized that “[h]aving more EVs on Missouri highways has local environmental and health benefits including cleaner local air because of no exhaust emissions or petroleum spills or leaks. Additionally, EVs can have other environmental benefits from the use of renewable sources to produce the electricity.”<sup>1</sup> In the same Order, the Commission found that “[f]inancial benefits from an EV charging network accrue to both the utility and the ratepayers.

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<sup>1</sup> Report and Order, Case No. ET-2018-0132, Doc. No. 150, p. 16.

Utilities and ratepayers benefit economically from the improved utilization of fixed assets when charging is done in off-peak times. EVs are considered to be a flexible load that can charge during periods when demand is low.”<sup>2</sup> Given the environmental and financial benefits from EVs, developing a robust charging infrastructure is in the public interest of Missouri. To achieve these benefits, the Commission should not limit utilities to line-extension, or “Make Ready Model,” policy choices.

EV charging infrastructure is not simply about unlocking the environmental and system benefits; it is also required for Missouri’s electric utilities to meet an emerging *need* of their customers and the public. In its Report and Order regarding Ameren Missouri’s Efficient Electrification Program, the Commission discussed that EVs are changing the electric service needs of customers, stating: “[t]he electric service needs of Ameren Missouri’s customers are evolving as demonstrated by the trend toward EV adoption in the state and nationally and the growing number of automakers that are aggressively ramping up EV production.”<sup>3</sup> While EVs currently comprise a small portion of the total vehicles on the roads in Missouri, those numbers will continue to rise. Missouri’s electric utilities have an obligation to serve customers and the Commission should make clear that this obligation extends to EV customers.

At the workshop, not all attendees agreed that utilities should play a larger role in developing EV infrastructure. Even the stakeholders who agreed that utilities should actively develop EV charging throughout the state did not agree on a single, one-size-fits-all approach. While a “Make Ready Model” is one way to facilitate the build-out of EV charging stations, it is unlikely to be enough. The Commission should encourage utilities to go further.

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<sup>2</sup> Id.

<sup>3</sup> Report and Order, Case No. ET-2018-0132, Doc. No. 150, p. 16.

This past fall, the Commission ordered each utility to “[d]escribe all current and planned electric vehicle initiatives undertaken by the utility, including how such initiatives have been affected by the Western District Court of Appeals’ ruling in WD80911” in their Integrated Resource Plan filings. In seeking this information, along with EV load projections, the Commission has acknowledged that utilities have a role to play in advancing EV charging infrastructure. Whether it be through utility ownership or through a reverse-auction incentive program, each electric utility must find ways to meet this emerging need of their customers.

#### Ensuring efficient use of infrastructure

If a utility constructs and owns the EV charging infrastructure (or if it invests to encourage third parties to construct and operate the stations), it should take steps to ensure the efficient use of the charging infrastructure. This means having more people use the charging network at times/locations that improve utilization of existing fixed assets.

In its initial comments, Renew Missouri proposed that utilities should offer on-tariff PAYS® financing for cities and local governments to expedite their access to electric buses. Doing so is an opportunity for utilities to meet the needs of municipal customers, realize financial benefits for the utility and customers alike, and generate environmental and health benefits. Renew Missouri has also supported direct incentive payments to encourage certain customers to purchase more efficient electric equipment like Ameren Missouri proposed with its Business Solutions Program. The Commission rejected Ameren’s Missouri’s proposal, but left open the possibility that it might consider such a program in the future if there was more evidence of customer benefit or assurances against “free-riders.” An on-tariff financing program to encourage fleet electrification is one way to overcome the Commission’s concerns about electrification because only the customer benefitting from the new measure would pay for the upgrade and the increased

electricity sales revenue would still benefit all customers. The Commission should encourage utilities to explore opportunities to work with municipalities and local governments to move towards electric vehicle fleets.

As a second component to encouraging efficient infrastructure use, Renew Missouri supports rate designs that reward EV owners for charging during off-peak hours. This could include time-of-use rates as well as managed-use rates for specific areas of the distribution system. Notably, Kansas City Power and Light presented its initial findings from its Clean Charging Network that EV usage was not significantly adding to its peak. However, given the early stages of EV adoption in Missouri, stakeholders should continue to examine rate designs that will encourage off-peak charging.

A third component to efficient use is customer and public education. The Division of Energy has advocated in several recent cases how important it is to provide customers access to the information that will help them make informed decisions about their electric use. As the Commission considers rate design proposals related to EVs, the program rollout and customer education should be prioritized to ensure success.