

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

In the Matter of the Application	)	
of Union Electric Company d/b/a	)	File No. ET-2018-0132
Ameren Missouri for Approval of	)	Tariff Nos. YE-2018-0103,
Efficient Electrification Program	)	YE-2018-0104, & YE-2018-0105

**RENEW MISSOURI’S STATEMENT OF POSITIONS**

COMES NOW Renew Missouri Advocates (“Renew Missouri”) and offers the following statement of positions:

**Issue 1:       Should the Commission approve, reject, or modify Ameren Missouri’s Charge Ahead – Electric Vehicle Program?**

Renew Missouri Position:

The Commission should approve Ameren Missouri’s Charge Ahead – Electric Vehicle Program as a way to promote and accelerate the adoption of Electric Vehicles.<sup>1</sup> Renew Missouri supports these program offerings as a way to further encourage renewable development that will be driven by the economics of renewable generation, customer preferences, and statutory requirements.<sup>2</sup> Despite protests raised by certain parties in this case, it is clear that regulated utilities have a role to play in developing EV charging infrastructure, whether it be through direct ownership, rate design, or incentives. Ameren’s proposal will ultimately offer benefits to participants, non-participating customers, the company, and the environment.<sup>3</sup> These outcomes are good for the public and the Commission should encourage policies that accelerate those benefits.

Here, Ameren seeks approval of tariff sheets, a variance from the Commission’s promotional practice rule, and accounting authority to defer the program costs. The Commission can approve tariff sheets, grant variances from its regulations relating to promotional practices<sup>4</sup>,

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<sup>1</sup> Wills Direct, p. 3.

<sup>2</sup> Owen Rebuttal, pp. 4-6.

<sup>3</sup> Wills Surrebuttal, p. 71.

<sup>4</sup> 4 CSR 240-14.010(2).

“prescribe uniform methods of keeping accounts, records and books, to be observed by ... electrical corporations [,]”<sup>5</sup> and “prescribe by order the accounts in which particular outlays and receipts shall be entered, charged or credited.”<sup>6</sup> The Commission should issue an order approving Ameren’s Charge Ahead - Electric Vehicle Program, grant the requested variance, and grant the accounting authority to defer the program costs.

**Issue 1.a: Has Ameren Missouri provided sufficient evidence that there is a need for the program?**

Renew Missouri Position:

The relief requested by Ameren Missouri does not require a finding that there is a need for the program.

**Issue 1.b: Has Ameren Missouri provided sufficient evidence that the program is cost effective?**

Renew Missouri Position:

The relief requested by Ameren Missouri does not require a finding that the program is cost-effective.

**Issue 1.c: If the program is approved, what is the appropriate cost recovery mechanism?**

Renew Missouri Position:

The Commission should grant the accounting authority to defer the program costs for consideration in a future rate case.

**Issue 1.d: If the program is approved, what conditions, if any, should be imposed by the Commission?**

Renew Missouri Position:

Renew Missouri did not file testimony requesting additional conditions but reserves the right to base a final position on the evidence presented at hearing.

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<sup>5</sup> Section 393.140(4) RSMo.

<sup>6</sup> Section 393.140(8) RSMo.

**Issue 2: Should the Commission approve, reject, or modify Ameren Missouri’s Charge Ahead – Business Solutions Program?**

Renew Missouri Position:

Yes. For the same reasons and under the same authority listed in Renew Missouri’s position on Issue 1, the Commission should approve Ameren Missouri’s Charge Ahead – Business Solutions Program.

**Issue 2.a: Has Ameren Missouri provided sufficient evidence that there is a need for the program?**

Renew Missouri Position:

The relief requested by Ameren Missouri does not require a finding that there is a need for the program.

**Issue 2.b: Has Ameren Missouri provided sufficient evidence that the program is cost effective?**

Renew Missouri Position:

The relief requested by Ameren Missouri does not require a finding that the program is cost-effective.

**Issue 2.c: If the program is approved, what is the appropriate cost recovery mechanism?**

Renew Missouri Position:

The Commission should grant the accounting authority to defer the program costs for consideration in a future rate case.

**Issue 2.d: If the program is approved, what conditions, if any, should be imposed by the Commission?**

Renew Missouri Position:

Renew Missouri did not file testimony requesting additional conditions but reserves the right to base a final position on the evidence presented at hearing.

**Issue 3: Should the Commission grant the variances requested by Ameren Missouri?**

Renew Missouri Position:

Yes. The Commission can grant variances from its regulations relating to promotional practices<sup>7</sup> and good cause exists in this case. The electrification through the Charge Ahead program offerings will encourage renewable development driven by the economics of renewable generation, customer preferences, and statutory requirements.<sup>8</sup>

WHEREFORE, Renew Missouri submits its *Statement of Positions*.

Respectfully Submitted,

/s/ Tim Opitz

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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 27<sup>th</sup> day of November 2018:

/s/ Tim Opitz

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<sup>7</sup> 4 CSR 240-14.010(2).

<sup>8</sup> Owen Rebuttal, pp. 4-6.