

3/14/19

Case No. 2019-0229: Request For Party Submissions

Missouri Public Service Commission (PSC):

► **MPCA.** The Missouri Petroleum Marketers and Convenience Store Association (MPCA) is a 250+ member statewide trade association located in Jefferson City which represents the majority of Missouri's convenience stores, gas stations, truck stops, and petroleum marketers as well as their many suppliers and vendors.

Many MPCA members are small, second or third generation family-owned businesses, and many MPCA members have convenience stores, gas stations, or truck stops located at or near interstate and highway exits.

► **3/21/19 Workshop.** Due to a prior commitment, MPCA will most likely not be able to attend the first workshop scheduled for 3/21/19 from 9:00 AM – 3:00 PM in the Governor Office Building, Room 450.

Please accept this document and the submissions below as MPCA's initial thoughts on electric vehicle (EV) charging stations.

► **Submissions On Behalf Of MPCA.**

1. None of the costs listed and detailed in the PSC's 3/5/19 Request For Party Submissions should be eligible for subsidization by utilities or eligible for special tariff/accounting/ratemaking treatment under a "make ready" approach.
2. Even if we assume the PSC has the authority, this important and far-reaching public policy issue - which will absolutely impact utility ratepayers, consumers, and the private sector retail motor fuel businesses and industry - should not be addressed by the PSC and instead should be addressed solely by the elected officials in the Missouri Legislature which represent the people of Missouri.
3. It is fundamentally unfair for utilities, public or otherwise, to be competing in the private sector against private sector motor fuel retailers.
4. The key public policy issue for MPCA members is who pays for the EV charging station when utilities are involved.
5. MPCA opposes public utilities like Ameren Missouri from receiving regulatory (PSC) authority to charge their ratepayers more every month to fund the infrastructure and construction of EV charging stations.
6. MPCA opposes utility ratepayers being forced in any way to pay for or subsidize, either directly or indirectly, any portion of the EV charging station including the

electricity, the lines, infrastructure, construction, or ongoing costs of the EV charging station.

7. This would allow utilities to socialize the costs and risks associated with EV charging stations and competing in the private sector retail motor fuel market. Again, this is fundamentally unfair.

8. MPCA believes in a level and fair playing field. If utilities want to enter and compete in the private sector retail motor fuel market, and therefore compete directly with private sector businesses, they should have to play by the exact same set of rules as other private sector motor fuel businesses.

9. MPCA members and utilities should find more ways to work together as partners when it comes to EV charging stations.

Sincerely,

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