

A. Federal Tax Credits

5. As proposed, Ameren Missouri's pilot program will allow investment in equipment supporting an EV charging station before year-end 2016. Ameren Missouri has purposefully aimed for such a timeline in order to take advantage of federal tax credits due to expire in December 2016. This tax credit will reduce the necessary investment in EV charging equipment by almost one-third of the cost of the first station to be installed, or approximately \$30,000 of the estimated \$95,000 cost. Consolidating this case with the general rate case, which will not be completed until sometime late in the second quarter of 2017, would increase the cost of the EV charging station slated to be placed in-service in 2016 because this tax credit will be time-barred and off the table. The Commission can avoid such a result only by keeping this case separate from the rate case, and by rendering a decision on the pilot program within the timeframe outlined in the Company's application.

B. Parties to the Respective Cases

6. The intervening parties in the two cases are not identical. For example, ChargePoint, Inc. is an intervenor in this case but not the rate case, while Renew Missouri and two locals of the International Brotherhood of Electrical Workers are intervenors in the rate case but not this case. If the Commission consolidates these cases per the movants' suggestion, intervenors in this case will need to expend additional time and resources to intervene and participate in another case which is much more data, time, and resource intensive. Parties who may have interest in this one singular issue (EV charging stations) will find themselves in three weeks of rate case hearings on a variety of unrelated topics. Conversely, parties to the rate case will be required to participate in a hearing which now addresses a subject in which they otherwise expressed no appreciable interest. Of the eleven total parties to this proceeding, only three felt compelled to request a consolidation of this case with the rate case, and all three are already parties to both. The Motion requests this outcome without justifying the additional burden it would impose or even explaining in any cogent way why consolidation is necessary or beneficial.

C. Maintaining Focus

7. Finally, as noted earlier in this response, all allegations and questions identified in the Motion regarding the merits of Ameren Missouri's proposed pilot program can be fully addressed in this case. Maintaining this separate case would allow the parties and the Commission to focus on issues related to the proposed program without interference from "noise" generated by the numerous and varied issues normally contested in a general rate case. With the possible exception of investment costs associated with the one charging station that is planned to be installed, used, and useful prior to the end of the rate case true-up period, issues the Commission must consider and decide in the rate case are not relevant to this case and vice versa. And even for that one station, the rate treatment of the investment, as is the rate treatment for all investments up to the true-up cutoff date, can be dealt with in the rate case. Moreover, if the Commission keeps these proceedings separate, questions related to charging station investment would only be relevant if the Commission approves the proposed pilot program.

II. The Motion raises issues for litigation, not justifications for consolidation.

8. Each of the allegations made by the movants goes to the merits of Ameren Missouri's proposal rather than to any justification for consolidation. The Motion makes or raises numerous allegations and questions about Ameren Missouri's proposed pilot program that easily can be addressed in this docket; e.g., whether regular electric rates paid by all the Company's customers would provide a subsidy to customers who use electric vehicles, whether competitive vehicle charging services should be offered on a regulated basis by an electric utility, and whether the proposed pilot program should be the responsibility of customers or shareholders. Nowhere in their Motion do the movants explain why the Company's proposed vehicle charging pilot program must, or even should, be addressed in the pending general rate case.

In summary, the Commission should deny the Motion because movants have failed to explain or justify why consolidation of this case with Ameren Missouri's pending general rate case is either necessary or desirable. None of the allegations or questions raised necessitates consolidation with the rate case in order to be appropriately resolved. Rather, the allegations and questions raised in the Motion

regarding the Company's proposed EV charging station pilot program go to the merits of the program, which can best be dealt with in a separate, focused docket. Further, consolidating the cases would impose unnecessary burdens on parties who have chosen to participate in one but not both cases, and would deny access to available federal tax credits, thereby increasing costs of the program. The Commission can best avoid these untenable results by keeping this case separate and rendering a decision on the pilot program within the timeframe outlined in the Company's application.

WHEREFORE, the Company prays the Commission make and enter its order denying the Motion.

Respectfully submitted,

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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 22nd day of September, 2016.

/s/ L. Russell Mitten