

**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 Efficient Electrification) File No. ET-2018-0132
Program)

CHARGEPOINT, INC.’S
STATEMENT OF POSITION ON THE ISSUES

COMES NOW ChargePoint, Inc. (ChargePoint), by and through counsel, and submits this statement of position on the separate list of issues filed by Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") on behalf of itself, the Staff of the Missouri Public Service Commission ("Staff"), the Office of the Public Counsel ("OPC"), Kansas City Power & Light Company ("KCPL"), Kansas City Power & Light Company – Greater Missouri Operations ("GMO"), Missouri Division of Energy ("DE"), Missouri Industrial Energy Consumers ("MIEC"), Natural Resources Defense Council ("NRDC"), Spire Missouri, Inc. ("Spire"), Empire District Electric Company ("Empire") and the Sierra Club, known collectively herein as "the Parties," on November 20, 2018:

1. **Should the Commission approve, reject, or modify Ameren Missouri’s Charge Ahead – Electric Vehicles Program?**
 - a. **Has Ameren Missouri provided sufficient evidence that there is a need for the program?**

Yes. It is ChargePoint's position that in the coming years Missouri will experience rapid growth in electric vehicle (“EV”) adoption, which will require a commensurate buildout of charging infrastructure. This need is supported by a number of studies, including National

Renewable Energy Laboratory's infrastructure analysis, which James Ellis cited in his Surrebuttal testimony. While studies and models may show a range of potential infrastructure needs, clearly more infrastructure is needed to accommodate the forecasted growth of electric vehicles. Supporting EV charging infrastructure buildouts through utility investment will help to achieve greater EV adoption near-term.

b. Has Ameren Missouri provided sufficient evidence that the program is cost effective?

Yes. The rebate-based approach proposed in Ameren Missouri's Charge Ahead – Electric Vehicles program is generally less costly than alternative utility investment models and has been successfully employed in other utility service territories. Overall, this program design reduces risks to ratepayers, lowers the cost barrier to EVSE deployment, allows the charging station site host to determine which equipment and services best meet their needs, and builds a sustainable EV charging marketplace to help accelerate EV adoption.

c. If the program is approved, what is the appropriate cost recovery mechanism?

ChargePoint supports the Company's contention that greater buildout of EV charging infrastructure, along with growing electric vehicle market penetration, will increase load over time and support greater utilization of grid assets. Increased load from EV charging leads to increased grid benefits that are shared by all customers, and accordingly programs that support EV charging incentives should be allowable in cost recovery.

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

It is ChargePoint's position that it is reasonable to expect thorough reporting from the Company on the incentives provided, customers engaged, and buildout of EV charging

infrastructure achieved. This reporting is contemplated in the testimony of Steven Wills.¹ It is ChargePoint's position that Ameren Missouri should offer a range of eligible EV charging hardware and network vendors for consumers to choose, as well as the stated ability to control assets deployed under this program. ChargePoint believes that these conditions are suggested or implied in the filed program proposal, but greater clarity on these points would ensure greater participation in the program.

2. Should the Commission approve, reject, or modify Ameren Missouri's Charge Ahead – Business Solutions Program?

- a. Has Ameren Missouri provided sufficient evidence that there is a need for the program?**
- b. Has Ameren Missouri provided sufficient evidence that the program is cost effective?**
- c. If the program is approved, what is the appropriate cost recovery mechanism?**
- d. If the program is approved, what conditions, if any, should be imposed by the Commission?**

ChargePoint does not have specific positions on the issues provided above on the Charge Ahead – Business Solutions program at this time. ChargePoint develops and seeks partnerships on a range of products to serve projects listed under this program. ChargePoint supports the intent of the program to increase transportation electrification in new and emerging segments of the market.

3. Should the Commission grant the variances requested by Ameren Missouri?

¹ Direct Testimony of Steven M. Wills. File No. ET-2018-0132. Page 40, Lines 3-9.

ChargePoint does not have a position on this issue at this time without impairment of its right to brief and argue this issue to the Commission as the evidence may unfold at hearing.

Respectfully submitted,

/s/ Mark W. Comley

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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via email on this 27th day of November, 2018, to:

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