

**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 a Tariff Setting a Rate for Electric Vehicle )  
Charging Stations )

**File No. ET-2016-0246**  
Tariff No. YE-2017-0052

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**REPORT AND ORDER**

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**Issue Date:** April 19, 2017

**Effective Date:** May 19, 2017

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Of a Tariff Setting a Rate for Electric Vehicle	)	Tariff No. YE-2017-0052
Charging Stations	)	

**APPEARANCES**

**UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI:**

**Paula N. Johnson**, Senior Corporate Counsel, **Wendy K. Tatro**, Director and Asst. General Counsel, 1901 Chouteau Avenue, PO Box 66149, St. Louis, Missouri 63166-6149.

**L. Russell Mitten**, Brydon, Swearingen & England, P.C., 312 East Capitol Avenue, PO Box 456, Jefferson City, Missouri 65102-0456.

**STAFF OF THE MISSOURI PUBLIC SERVICE COMMISSION:**

**Kevin A. Thompson**, Chief Staff Counsel, **Whitney Payne**, Assistant Staff Counsel, PO Box 360, Governor Office Building, 200 Madison Street, Jefferson City, Missouri 65102.

**OFFICE OF THE PUBLIC COUNSEL:**

**Lera L. Shemwell**, Senior Counsel, PO Box 2230, 200 Madison Street, Suite 650, Jefferson City, Missouri 65102-2230.

**MISSOURI DEPARTMENT OF ECONOMIC DEVELOPMENT-DIVISION OF ENERGY:**

**Alexander Antal**, Associate General Counsel, PO Box 1157, Jefferson City, Missouri 65102.

**CHARGEPOINT, INC.:**

**Mark W. Comley**, Newman, Comley & Ruth P.C., 601 Monroe Street, Suite 301, PO Box 537, Jefferson City, Missouri 65102-0537.

**KANSAS CITY POWER & LIGHT COMPANY and KCP&L GREATER MISSOURI OPERATIONS COMPANY:**

**James M. Fischer**, Fischer & Dority, P.C., 101 Madison Street, Suite 400, Jefferson City, Missouri 65101.

**Robert J. Hack** and **Roger W. Steiner**, Kansas City Power & Light Company, 1200 Main Street, 16<sup>th</sup> Floor, Kansas City, Missouri 64105.

**SIERRA CLUB AND NATURAL RESOURCES DEFENSE COUNCIL:**

**Henry B. Robertson**, Great Rivers Environmental Law Center, 319 N. Fourth Street, Suite 800, St. Louis, Missouri 63102.

**Joseph Halso**, 1536 Wynkoop Street, Suite 312, Denver, Colorado 80202.

**CONSUMERS COUNCIL OF MISSOURI:**

**John Coffman**, 871 Tuxedo Boulevard, St. Louis, Missouri 63119.

**SENIOR REGULATORY LAW JUDGE:** Michael Bushmann

# REPORT AND ORDER

## I. Procedural History

On August 15, 2016, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed an application requesting that the Missouri Public Service Commission approve a tariff authorizing a pilot program to install and operate electric vehicle (“EV”) charging stations at locations within Ameren Missouri’s service area along the U.S. Interstate 70 corridor between St. Louis and Boonville, Missouri, and in Jefferson City, Missouri. The Commission granted timely requests to intervene filed by the Midwest Energy Consumers Group; the Missouri Department of Economic Development – Division of Energy; Natural Resources Defense Council; Brightergy, LLC; ChargePoint, Inc.; Sierra Club; Consumers Council of Missouri; and the Missouri Industrial Energy Consumers.

On October 6, 2016, after considering the recommendations of the parties, the Commission found that the original tariff filed by Ameren Missouri was not adequate because its rate structure, based on 15-minute intervals of time, discriminated against electric vehicle drivers with less powerful onboard charging devices. The Commission rejected that tariff, but authorized Ameren Missouri to file a new tariff to correct that problem. On October 7, 2016, Ameren Missouri filed a revised tariff under Tariff Tracking No. YE-2017-0052 with an effective date of November 6, 2016. The Commission subsequently suspended the effective date of that tariff until June 4, 2017 in order to conduct a hearing regarding Ameren Missouri’s application.

The Commission held an evidentiary hearing on January 12 and 31, 2017.<sup>1</sup> During the evidentiary hearing, the parties presented evidence relating to some or all of the following unresolved issues previously identified by the parties:

1. Does the Commission have jurisdiction to regulate utility-owned and operated electric vehicle charging stations operated in a utility's service area?
2. Are there public benefits realized from the installation of electric vehicle charging stations, specifically if the Commission were to approve Ameren Missouri's proposed pilot project?
3. Is Ameren Missouri acting as a regulated utility in offering this service?
4. Does the pilot design proposed by Ameren Missouri impact competition with third parties for charging station sites in its service territory?
5. Does Ameren Missouri's proposed tariff represent the proper rate design for its EV charging station pilot project?
6. Should the cost of installing the electric vehicle charging stations be booked below the line or above the line and recovered from ratepayers?

Final post-hearing briefs were filed on February 28, 2017, and the case was deemed submitted for the Commission's decision on that date when the Commission closed the record.<sup>2</sup>

## **II. Findings of Fact**

Any finding of fact for which it appears that the Commission has made a determination between conflicting evidence is indicative that the Commission attributed

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<sup>1</sup> Transcript, Vols. 2-4. The Commission admitted the testimony of 12 witnesses and 28 exhibits into evidence during the evidentiary hearing.

<sup>2</sup> "The record of a case shall stand submitted for consideration by the commission after the recording of all evidence or, if applicable, after the filing of briefs or the presentation of oral argument." Commission Rule 4 CSR 240-2.150(1).

greater weight to that evidence and found the source of that evidence more credible and more persuasive than that of the conflicting evidence.

1. Union Electric Company d/b/a Ameren Missouri is an electrical corporation and public utility that provides electric service through its tariffs in Missouri.<sup>3</sup>

2. The Staff of the Missouri Public Service Commission (“Staff”) is a party in all Commission investigations, contested cases, and other proceedings, unless it files a notice of its intention not to participate in the proceeding within the intervention deadline set by the Commission.<sup>4</sup> Staff participated in this proceeding.

3. The Office of the Public Counsel is a party to this case pursuant to Section 386.710(2), RSMo<sup>5</sup>, and by Commission Rule 4 CSR 240-2.010(10).

4. In its application and proposed tariff, Ameren Missouri proposes to deploy an electric vehicle charging station pilot project (“pilot project”) aimed at investigating the merits of providing an EV charging service intended for use by both the long-distance driving public and the communities that are situated along long-distance driving corridors.<sup>6</sup>

5. The pilot project involves the identification of six charging station site locations, each of which will feature both direct current (DC) fast-charging and standard Level 2 alternating current (AC) charging stations for public use. These charging stations will be located in selected communities along the U.S. Interstate 70 (“I-70”) corridor between Boonville and St. Louis City – respectively the western-most and eastern-most

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<sup>3</sup> Ex. 6 and 7.

<sup>4</sup> Commission Rules 4 CSR 240-2.010(10) and (21) and 2.040(1).

<sup>5</sup> Unless otherwise stated, all statutory citations are to the Revised Statutes of Missouri, as codified in the year 2016.

<sup>6</sup> Ex. 1, Nealon Direct, p. 4.

reaches of the Ameren Missouri service territory along this route – plus an additional charging station in Jefferson City.<sup>7</sup>

6. The EV charging stations are designed to be between 20 to 45 miles apart in order to serve both the local communities and long-distance drivers traveling along I-70. The charging stations would accommodate all currently available EVs by providing access to all industry-standard charging plugs.<sup>8</sup>

7. Ameren Missouri would obtain an easement for installation of the charging station from each of the site hosts, who have not yet been selected.<sup>9</sup>

8. The average cost to procure equipment, install, and commission each of the EV charging stations along I-70 and in Jefferson City is estimated at \$95,000. The \$95,000 per charging station is comprised of an average \$15,000 Ameren Missouri line extension and transformation cost, an average \$60,000 hardware cost for charging equipment and an outdoor electric panel, and an average \$20,000 cost for civil construction, hardware installation and site commissioning.<sup>10</sup>

9. The pilot project proposed by Ameren Missouri focuses on plug-in electric vehicles which can be charged with electricity from the electric grid. This includes both battery electric vehicles that rely entirely upon electricity and plug-in hybrid electric vehicles that rely upon electricity for daily driving needs, but use gasoline for longer trips.<sup>11</sup> Ameren Missouri has deliberately chosen to include compatible charging plugs for both types of vehicles to provide a public charging service that all EV owners can utilize.<sup>12</sup>

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<sup>7</sup> Ex. 1, Nealon Direct, p. 4.

<sup>8</sup> Ex. 1, Nealon Direct, p. 5.

<sup>9</sup> Transcript, Vol. 2, p. 144.

<sup>10</sup> Ex. 1, Nealon Direct, p. 15.

<sup>11</sup> Ex. 550, Garcia Surrebuttal, p. 6.

<sup>12</sup> Ex. 2, Nealon Surrebuttal, p. 9.

10. Charging an electric vehicle is analogous to filling a conventional vehicle's fuel tank with gasoline. An electric vehicle is plugged into the electric grid so that electricity can flow through wires and charge the battery.<sup>13</sup> Charging an EV requires transforming the AC electricity from the utility to DC power stored in the battery for use by the vehicle.<sup>14</sup>

11. EV charging stations consist of specialized equipment, such as the physical charging station box with a cord and plug to attach to an electric vehicle, computer software within the station, and a network that communicates via Wi-Fi or a cellular network to a cloud that allows for monitoring by the station owner and locating the station by an EV driver.<sup>15</sup> The station looks similar to a gasoline fuel pump at a gas station and is connected to an electrical panel to obtain electricity.<sup>16</sup> EV drivers can utilize the EV station network through a single mobile cell phone app for real time station information and payment and support services.<sup>17</sup> EV drivers can pay for their purchase by swiping a magnetic card, such as a credit card.<sup>18</sup>

12. Ameren Missouri is in discussions with possible site hosts for the EV charging stations within one quarter mile to three miles from I-70. The potential sites are located close to 24/7 amenities and conveniences that EV drivers and passengers could use while the vehicle battery is charging. Ameren Missouri's goal is to mimic the experience of fueling a gasoline-powered vehicle at a gas station.<sup>19</sup>

13. The AC Level 2 charging industry standard is for charging equipment that uses 240V, split-phase alternating current circuit and connects to the car through a SAE

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<sup>13</sup> Ex. 500, Jester Rebuttal, Schedule SC-2, p. 29.

<sup>14</sup> Transcript, Vol. 2, p. 234.

<sup>15</sup> Transcript, Vol. 2, p. 346.

<sup>16</sup> Ex. 1, Nealon Direct, Schedule mjn-4, p. 17; Ex. 500, Jester Rebuttal, p. 28.

<sup>17</sup> Ex. 300, Smart Rebuttal, p. 3.

<sup>18</sup> Transcript, Vol. 2, p. 161.

<sup>19</sup> Transcript, Vol. 2, p. 161-164.



J1772 plug. AC Level 2 charging allows up to 80 amps of current, which would transfer up to 19 kW power but the on-board chargers (which convert AC to DC power) in most vehicles cannot accept that throughput, so common installations are 40 amps or less. Each hour of charging at maximum current for AC Level 2 could add approximately 60 miles to vehicle range but vehicle and circuit limits make 20 to 30 miles per hour of charging more representative.<sup>20</sup>

14. DC fast charging is accomplished by connecting a high-amperage direct current directly to the vehicle battery, unlike the AC chargers which go through an AC-DC conversion on-board the vehicle. In this case, the charger that turns the AC electricity available from the grid into the DC electricity required to charge the battery is located in the charging station equipment rather than within the car. Fast chargers typically are able to transfer energy at the rate of 44 kW, which can add range to a typical compatible vehicle at a rate of more than 100 miles per hour of charging.<sup>21</sup>

15. Per the revised tariff filed on October 7, 2016, Ameren Missouri is proposing to charge \$0.17 per minute of plug-in time for DC fast-charging and \$0.20 per kilowatt-hour for Level 2 AC charging.<sup>22</sup>

16. Ameren Missouri has a provision in one of its tariffs that prohibits the resale of electricity. That provision was originally included to prevent situations like a subdivision developer or apartment owner from reselling electricity to houses or apartments. The prohibition was not designed to apply to charging electric vehicles.<sup>23</sup>

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<sup>20</sup> Ex. 500, Jester Rebuttal, p. 22.

<sup>21</sup> Ex. 500, Jester Rebuttal, p. 22-23; Schedule SC-2, p. 31.

<sup>22</sup> Ex. 2, Nealon Surrebuttal, p. 2.

<sup>23</sup> Transcript, Vol. 2, p. 234; Ameren Missouri tariff Schedule No. 6, Original Sheet No. 137.

17. There are currently 1,025 public EV charging ports in Missouri supporting 3,092 registered EV drivers. ChargePoint has at least 37 public charging ports in Ameren Missouri's service territory.<sup>24</sup> These ports and EV charging stations are not regulated by the Commission.

18. Kansas City Power & Light Company is developing the Clean Charge Network, which is an initiative to install and operate more than 1,000 EV charging stations throughout the Kansas City region. That company does not have an approved tariff in Missouri for its operation of those EV charging stations as a utility service.<sup>25</sup>

### **III. Conclusions of Law and Discussion**

Ameren Missouri is an "electrical corporation"<sup>26</sup> and "public utility"<sup>27</sup> and, thus, subject to the supervision of the Commission.<sup>28</sup> As an electrical corporation, Ameren Missouri must obtain the permission and approval of the Commission before beginning construction of an electric plant<sup>29</sup> and establishing by tariff a new rate or charge.<sup>30</sup> Since Ameren Missouri brought the application for approval of a tariff, it bears the burden of proof.<sup>31</sup> The burden of proof is the preponderance of the evidence standard.<sup>32</sup> In order to

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<sup>24</sup> Ex. 300, Smart Rebuttal, p. 5-6; Ex. 302.

<sup>25</sup> Ex. 650, Rush Rebuttal, p. 6.

<sup>26</sup> Section 386.020(15), RSMo.

<sup>27</sup> Section 386.020(43), RSMo.

<sup>28</sup> Sections 393.140(1) and 386.250(1), RSMo.

<sup>29</sup> Section 393.170.1, RSMo.

<sup>30</sup> Sections 393.150.1 and 393.140(11), RSMo.

<sup>31</sup> Section 393.150.2, RSMo; "The burden of proof, meaning the obligation to establish the truth of the claim by preponderance of the evidence, rests throughout upon the party asserting the affirmative of the issue". *Clapper v. Lakin*, 343 Mo. 710, 723, 123 S.W.2d 27, 33 (1938).

<sup>32</sup> *Bonney v. Environmental Engineering, Inc.*, 224 S.W.3d 109, 120 (Mo. App. 2007); *State ex rel. Amrine v. Roper*, 102 S.W.3d 541, 548 (Mo. banc 2003); *Rodriguez v. Suzuki Motor Corp.*, 936 S.W.2d 104, 110 Mo. banc 1996).

meet this standard, Ameren Missouri must convince the Commission it is “more likely than not” that its allegations are true.<sup>33</sup>

The threshold question for determination is whether the Commission has jurisdiction to regulate utility-owned and operated electric vehicle charging stations operated in a utility’s service area. The Commission “is an administrative agency with limited jurisdiction and the lawfulness of its actions depends directly on whether it has statutory power and authority to act.”<sup>34</sup> The Commission’s statutory authority to regulate the EV charging stations proposed by Ameren Missouri depends on whether those charging stations constitute “electric plant”, which is defined, in part, as “all real estate, fixtures and personal property operated, controlled, owned, used or to be used for or in connection with or to facilitate the generation, transmission, distribution, sale or furnishing of electricity for light, heat or power.”<sup>35</sup>

The Commission finds that EV charging stations are not “electric plant” as defined in the statute because they are not used for furnishing electricity for light, heat, or power. EV charging stations are facilities that use specialized equipment, such as a specific cord and vehicle connector, to provide the service of charging a battery in an electric vehicle. The battery is the sole source of power to make the vehicle’s wheels turn, the heater and air conditioner operate, and the headlights shine light. The charging service is the product being sold, not the electricity used to power the charging system. By analogy, a laundromat uses electricity to provide clothes drying services, but that does not mean the laundromat’s

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<sup>33</sup> *Holt v. Director of Revenue, State of Mo.*, 3 S.W.3d 427, 430 (Mo. App. 1999); *McNear v. Rhoades*, 992 S.W.2d 877, 885 (Mo. App. 1999); *Rodriguez*, 936 S.W.2d at 109-111; *Wollen v. DePaul Health Center*, 828 S.W.2d 681, 685 (Mo. banc 1992).

<sup>34</sup> *State ex rel. Gulf Transp. Co. v. Public Service Commission of State*, 658 S.W.2d 448, 452 (Mo. App. 1983).

<sup>35</sup> Section 386.020(14), RSMo.

dryers are electric plant, or that the laundromat should be regulated by the Commission. EV charging stations are not “electric plant” and, therefore, the Commission lacks statutory authority to regulate their operation. To rule otherwise would conceivably assert jurisdiction over other similar battery-charging services, such as smart phone charging stations or kiosks, RV parks that allow vehicles to connect to the park’s electricity supply, or airports that connect planes to a hangar’s electricity supply while parked, which the Missouri General Assembly could not have intended.

This conclusion is further buttressed by an understanding of the Commission’s organic act, the statutes establishing the Commission and its mission, which illuminate the fundamental difference between a monopoly and a business operating in a competitive economic environment.<sup>36</sup> Natural monopoly industries have high fixed costs and capital investment costs that serve as barriers to entry of new competition.<sup>37</sup> Even if new competition was able to surmount these barriers, the costs of doing so would be significant. The Commission was established to prevent this unnecessary duplication of service on the theory that such over-crowding of the field will eventually be a burden on the public.<sup>38</sup> These laws are based on a policy to substitute regulated monopoly for destructive competition in order to protect the public.<sup>39</sup> However, it is designed as a practical system to promote the public good, and the facts of each case must be considered in applying it.<sup>40</sup>

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<sup>36</sup> *State ex rel. Gulf Transport Co. v. Public Service Commission*, 658 S.W.2d 448, 456 (Mo. App. 1983).

<sup>37</sup> *Id.*

<sup>38</sup> *State ex rel. City of Sikeston v. Public Service Commission of Missouri*, 336 Mo. 985, 997, 82 S.W.2d 105, 109 (1935).

<sup>39</sup> *State ex rel. Elec. Co. of Missouri v. Atkinson*, 275 Mo. 325, 204 S.W. 897, 899 (1918).

<sup>40</sup> *Id.*

There may be situations where competition could serve a useful public purpose if the public is protected and it does not result in economic waste.<sup>41</sup>

The Commission concludes that Ameren Missouri has not demonstrated that the business of EV charging stations needs to be regulated in order to protect the public. Currently, EV drivers are not captive customers being served by a single utility, but have a choice among several providers of EV charging services.

Ameren Missouri may own and operate EV charging stations in Missouri, but it may only do so on an unregulated basis without including those charging stations in its rate base or seeking recovery from ratepayers for any of the costs associated with the construction or operation of those charging stations. However, Ameren Missouri may include in rate base any equipment, such as distribution lines, transformers, and meters, necessary to provide electric service to an owner of an EV charging station, whether or not that owner is affiliated with Ameren Missouri.

#### **IV. Decision**

In making this decision, the Commission has considered the positions and arguments of all of the parties. After applying the facts to the law to reach its conclusions, the Commission determines that the substantial and competent evidence in the record supports the conclusion that Ameren Missouri has not met, by a preponderance of the evidence, its burden of proof to demonstrate that the Commission has the statutory authority to approve Ameren Missouri's tariff authorizing the EV charging station pilot project. Therefore, the Commission will deny the Ameren Missouri application and reject the tariff.

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<sup>41</sup> *State ex rel. City of Sikeston v. Public Service Commission of Missouri*, 336 Mo. 985, 998, 82 S.W.2d 105, 110 (1935).

The Commission will direct Ameren Missouri to accumulate data regarding the appropriate electric rate to charge owners of EV charging stations and provide that data during its next general rate case. In addition, the Commission will also direct Ameren Missouri to file an amended tariff to revise the existing prohibition on the resale of electricity in order to clarify that EV charging stations are not reselling electricity. Since the Commission has determined that it lacks statutory authority over the proposed EV charging stations, and this issue is dispositive in the case, it is unnecessary for the Commission to address the remaining disputed issues proposed by the parties.

**THE COMMISSION ORDERS THAT:**

1. Union Electric Company d/b/a Ameren Missouri's application for approval of a tariff authorizing a pilot program to install and operate electric vehicle charging stations filed on August 15, 2016, is denied.

2. The tariff submitted under Tariff Tracking No. YE-2017-0052 on October 7, 2017, is rejected. The specific tariff sheets rejected are:

**MO. P.S.C. Schedule No. 6**

1<sup>st</sup> Revised Sheet No. 166, Canceling Original Sheet No. 166  
Original Sheet No. 166.1

3. Union Electric Company d/b/a Ameren Missouri shall accumulate data regarding the appropriate electric rate to charge owners of EV charging stations and provide that data during its next general rate case.

4. Union Electric Company d/b/a Ameren Missouri shall submit an amended tariff to Schedule No. 6, Original Sheet No. 137 as a thirty-day tariff filing with the changes proposed in the exemplar tariff attached as Appendix D to Ameren Missouri's reply brief in this case.

5. This order shall become effective on May 19, 2017.



**BY THE COMMISSION**

A handwritten signature in black ink that reads "Morris L. Woodruff". The signature is written in a cursive, flowing style.

Morris L. Woodruff  
Secretary

Stoll, Kenney, and Coleman, CC., concur,  
Hall, Chm., C., concurs, with separate concurring  
opinion to follow,  
Rupp, C., dissents;  
and certify compliance with the provisions  
of Section 536.080, RSMo.

Dated at Jefferson City, Missouri,  
on this 19<sup>th</sup> day of April, 2017.

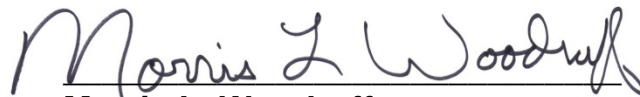
**STATE OF MISSOURI**

**OFFICE OF THE PUBLIC SERVICE COMMISSION**

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 19<sup>th</sup> day of April 2017.



  
Morris L. Woodruff  
Secretary



**MISSOURI PUBLIC SERVICE COMMISSION**

**April 19, 2017**

**File/Case No. ET-2016-0246**

**Missouri Public Service Commission**

Staff Counsel Department  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
staffcounsel@psc.mo.gov

**Office of the Public Counsel**

Hampton Williams  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, MO 65102  
opc@psc.mo.gov

**Brightergy, LLC**

Andrew Zellers  
1712 Main Street, 6th Floor  
Kansas City, MO 64108  
andyzellers@brightergy.com

**ChargePoint, Inc.**

Mark W Comley  
601 Monroe Street., Suite 301  
Jefferson City, MO 65102-0537  
comley@ncrpc.com

**Consumers Council of Missouri**

John B Coffman  
871 Tuxedo Blvd.  
St. Louis, MO 63119-2044  
john@johncoffman.net

**Kansas City Power & Light Company**

James M Fischer  
101 Madison Street, Suite 400  
Jefferson City, MO 35101  
jfisherpc@aol.com

**Kansas City Power & Light Company**

Robert Hack  
1200 Main, 19th Floor  
P.O. Box 418679  
Kansas City, MO 64141-9679  
rob.hack@kcpl.com

**Kansas City Power & Light Company**

Roger W Steiner  
1200 Main Street, 19th Floor  
P.O. Box 418679  
Kansas City, MO 64105-9679  
roger.steiner@kcpl.com

**KCP&L Greater Missouri Operations Company**

James M Fischer  
101 Madison Street, Suite 400  
Jefferson City, MO 35101  
jfisherpc@aol.com

**KCP&L Greater Missouri Operations Company**

Robert Hack  
1200 Main, 19th Floor  
P.O. Box 418679  
Kansas City, MO 64141-9679  
rob.hack@kcpl.com

**KCP&L Greater Missouri Operations Company**

Roger W Steiner  
1200 Main Street, 19th Floor  
P.O. Box 418679  
Kansas City, MO 64105-9679  
roger.steiner@kcpl.com

**Midwest Energy Consumers Group**

David Woodsmall  
807 Winston Court  
Jefferson City, MO 65101  
david.woodsmall@woodsmalllaw.com

**Missouri Division of Energy**

Brian T Bear  
301 W. Hight St., Room 680  
P.O. Box 1766  
Jefferson City, MO 65102  
brian.bear@ded.mo.gov

**Missouri Industrial Energy Consumers (MIEC)**

Edward F Downey  
221 Bolivar Street, Suite 101  
Jefferson City, MO 65101  
efdowney@bryancave.com

**Missouri Industrial Energy Consumers (MIEC)**

Diana M Vuylsteke  
211 N. Broadway, Suite 3600  
St. Louis, MO 63102  
dmvuylsteke@bryancave.com

**Missouri Public Service Commission**

Nathan Williams  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
nathan.williams@psc.mo.gov

**Natural Resources Defense Council Sierra Club**

Henry B Robertson  
319 N. Fourth St., Suite 800  
St. Louis, MO 63102  
hrobertson@greatriverslaw.org

Joe Halso  
1536 Wynkoop Street, Suite 312  
Denver, CO 80202  
joe.halso@sierraclub.org

**Sierra Club**  
Henry B Robertson  
319 N. Fourth St., Suite 800  
St. Louis, MO 63102  
hrobertson@greatriverslaw.org

**Union Electric Company**  
Paula Johnson  
1901 Chouteau Ave  
St Louis, MO 63103  
AmerenMOService@ameren.com

**Union Electric Company**  
Russ Mitten  
312 E. Capitol Ave  
P.O. Box 456  
Jefferson City, MO 65102  
rmitten@brydonlaw.com

**Union Electric Company**  
Wendy Tatro  
1901 Chouteau Avenue  
St. Louis, MO 63103-6149  
AmerenMOService@ameren.com

***Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).***

***Sincerely,***

  
**Morris L. Woodruff**  
**Secretary**

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Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.