

**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	)	<b>Case No. ET-2016-0246</b>
Of a Tariff Setting a Rate for Electric Vehicle	)	Tariff No. YE-2017-0030
Charging Stations.	)	

**THE CONSUMERS COUNCIL OF MISSOURI’S CONCURRENCE IN THE MOTION  
TO REJECT FILED BY THE OFFICE OF THE PUBLIC COUNSEL**

COMES NOW the Consumers Council of Missouri (“Consumers Council” or “CCM”), by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075, and states its support of the Office of the Public Counsel’s (“Public Counsel’s”) October 13, 2016 Motion to Reject its Motion to Reject Ameren Missouri’s electric vehicle (“EV”) charging station tariff.

The Commission lacks jurisdiction to approve the proposed tariff because Ameren Missouri’s proposal to install and operate EV charging stations is not a “public utility” service under Missouri law.<sup>1</sup> Moreover, EV charging stations not “electric plant” as used within the definition of “electric corporation”.<sup>2</sup> EV charging stations are not designed nor intended to provide Ameren’s ratepayers with safe and adequate electric service.<sup>3</sup>

The EV charging stations contained in Ameren Missouri’s proposed tariff are being made available to consumers who are not among its captive electric consumers who reside within its monopoly service territory. These EV charging stations are an activity taking place in a competitive market, and thus should be the responsibility of its

---

<sup>1</sup> Section 393.140(1) RSMo.

<sup>2</sup> Section 386.020 (14) RSMo.

<sup>3</sup> Section 393.130 RSMo.

shareholders, not its captive customers. If the utility wants to risk its own money in an unregulated competitive business, that's fine. However, Ameren Missouri's electric ratepayers should be shielded from subsidizing the utility's unregulated ventures.

WHEREFORE, Consumers Council respectfully expresses its concurrence in the Public Counsel's Motion to Reject Ameren Missouri's ("Ameren") electric vehicle ("EV") charging station tariff.

Respectfully submitted,

\_\_\_\_\_/s/ John B. Coffman \_\_\_\_\_

John B. Coffman (MBE #36591)  
John B. Coffman, LLC  
871 Tuxedo Blvd.  
St. Louis, MO 63119-2044  
Ph: (573) 424-6779  
E-mail: [john@johncoffman.net](mailto:john@johncoffman.net)

Attorney for Consumers Council of Missouri

## CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties listed on the official service list for Case No. ET-2016-0246 on this 13th day of October, 2016.

          /s/ John B. Coffman