

**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 ) **File No. ET-2018-0132**  
Approval of a Tariff Setting a Rate for )  
Electric Vehicle Charging Stations )

**INITIAL POST-HEARING BRIEF OF SIERRA CLUB  
& NATURAL RESOURCES DEFENSE COUNCIL**

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## I. Introduction

In this case, Ameren Missouri (“Ameren” or the “Company”) requests approval of tariff sheets and creation of accounting authority to support two new, forward-thinking programs: Charge Ahead – Electric Vehicles and Charge Ahead – Business Solutions (collectively referred to as “Charge Ahead” or the “Program”).<sup>1</sup> If approved, Charge Ahead would create incentives for third parties to deploy electric vehicle (“EV”) charging stations for passenger cars and offer rebates to support customer purchase of cleaner, more efficient EVs for goods movement and materials handling.<sup>2</sup> Charge Ahead is designed to improve electricity system efficiency and flexibility to the benefit of all Ameren customers<sup>3</sup>, and would support much-needed air quality improvement in the Company’s service territory.<sup>4</sup>

The Charge Ahead program may be innovative, but the policy issues at its heart have been closely studied by this Commission in two working cases and several contested proceedings.<sup>5</sup> Charge Ahead is the beneficiary of the Commission’s guidance in those cases as well as robust stakeholder input.<sup>6</sup> Prior to the initiation of this case and as part of the three workshops during it, Ameren has solicited and worked to address the feedback of all stakeholders.<sup>7</sup> Given its careful design and positive cost-benefit assessment—an assessment that captures only a few of the many

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<sup>1</sup> Application, Request for Variance, and Request for Accounting Authority at 1, File No. ET-2018-0132 (filed February 22, 2018) [hereinafter: “Application”]. The company’s application is supported by the testimony of Tom Byrne (Exhibit 1), Patrick Justis (Exhibits 2, 3), David Pickles (Exhibits 4, 5), and Steven M. Wills (Exhibits 6, 7).

<sup>2</sup> Application at 3-4; *see also* Exhibit 2, Direct Testimony of Patrick E. Justis; Exhibit 4, Direct Testimony of David Pickles.

<sup>3</sup> *See* Exhibit 6, Direct Testimony of Steven Wills at 33-34, 37-38.

<sup>4</sup> *See* Exhibit 300, Rebuttal Testimony of Cherylyn Kelley at 9; Exhibit 2, Direct Testimony of Patrick E. Justis at 6-7.

<sup>5</sup> *See* EW-2016-0123; EW-2017-0245; ET-2016-0246; ER-2016-0285; ER-2014-0370; *see also* Exhibit 400, Surrebuttal Testimony of James Owen at 8 (explaining that the use of incentives has been successful in the MEEIA context).

<sup>6</sup> *See, e.g.*, Exhibit 6, Direct Testimony of Steven M. Wills at 8.

<sup>7</sup> *See, e.g.*, Exhibit 2, Direct Testimony of Patrick E. Justis at 27-29, 32-33.

benefits of transportation electrification—the Charge Ahead program is a no-regrets opportunity for “learning-by-doing.”

For several reasons, Sierra Club and Natural Resources Defense Council (“NRDC”) support approval of the Charge Ahead program. First, Ameren’s modest portfolio of programs would accelerate electrification of three market-ready electric vehicle (“EV”) technologies: electric cars<sup>8</sup>, electric forklifts and airport ground support equipment.<sup>9</sup> Second, Charge Ahead would address key barriers to electrification. For electric cars, Ameren proposes to deploy charging stations where they are needed most—at home, at work and along highway corridors; for materials handling and airport ground support equipment, Ameren would help overcome the barriers of upfront infrastructure and vehicle cost, which remain obstacles despite competitive total costs of ownership. Finally, the Program’s emphasis on the integration of new EV load for grid and customer benefit would help Ameren customers and all Missourians realize the benefits of transportation electrification sooner rather than later.

For these reasons, Sierra Club urges the Commission to approve Ameren’s Charge Ahead program subject to the minor modifications described in Sections II.a.iv and II.b.iv, below, and summarized here:

- For the Charge Ahead – Electric Vehicles and Business Solutions programs, the Company should include robust data collection and reporting, and commit to annual reports during the five-year term of the program;
- For the Charge Ahead – Electric Vehicles program, the Company should ensure that all customers benefit by committing to serve communities that have been historically burdened by transportation pollution.

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<sup>8</sup> See *id.* at 17, 31-39.

<sup>9</sup> Exhibit 4, Direct Testimony of David Pickles at 16-17.

## II. Discussion

In the sections below, Sierra Club and NRDC address Issues 1(a)-(d) and 2(a)-(d), which concern the "need" for the Charge Ahead program, its cost-effectiveness, and the reasonableness of cost recovery, in addition to recommended program modifications. From the infrastructure gap for EV charging and the unmet market for electrified materials handling and airport ground support equipment, it is clear that there is a demand and need for Charge Ahead. It is also clear that the program is well-designed to deliver the electricity grid benefits on which it is premised and which far outweigh its costs.

At the same time, the relief requested by Ameren in this case does not require a demonstration of absolute “need” or a present determination of cost-effectiveness since that must be deferred for future documentation and cost recovery. This case does not concern a Certificate of Convenience and Necessity (CCN). Moreover, even in the CCN context, "the term ‘necessity’ does not mean ‘essential’ or ‘absolutely indispensable’” as Staff would have this Commission believe, but instead means "that an additional service would be an improvement justifying its cost."<sup>10</sup>

Whether a program is labeled as “load building” or “beneficial electrification” is of little consequence compared to its actual outcomes and benefits. Here, it is uncontroverted that Charge Ahead will support increased system efficiency to benefit of all Ameren customers, not to mention positive overall energy efficiency, air quality, environmental and energy security outcomes. It is recognition of these electricity system benefits that have led state utility commissions to adopt policies and programs in support of transportation electrification, from Michigan, Ohio and Minnesota to Florida, Utah and Nevada. This Commission—which has acknowledged that EVs

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<sup>10</sup> *State ex rel. Intercon Gas, Inc. v. Pub. Serv. Comm'n of Missouri*, 848 S.W.2d 593, 597 (Mo. Ct. App. 1993).

can deliver widespread benefits time and again through workshops and proceedings—should now act to approve the Charge Ahead program, creating real world data that will help the Commission and stakeholders prepare for an EV future and maximize its potential benefits.

**a. The Charge Ahead – Electric Vehicles program should be approved.**

- i. By serving critical infrastructure needs, the Electric Vehicles Program would support accelerated EV adoption and “pull forward” the benefits of transportation electrification.*

The Charge Ahead – Electric Vehicles program aims to deploy Level 2 charging stations at multi-unit dwellings and workplaces, and targets deployment of direct current fast charging (“DCFC”) stations along highway corridors.<sup>11</sup> Access to charging at each of these locations is critical to enable EV adoption and comprehensively meet the needs of EV drivers. As Mr. Justis explains in testimony, it is important for would-be drivers to have access to infrastructure in places where cars are naturally parked for long periods of time (*e.g.*, the home and workplace), and to have access to DCFC in locations that enable distance travel (*e.g.*, highway corridors).<sup>12</sup> Division of Energy<sup>13</sup> and ChargePoint<sup>14</sup> concur. Because Charge Ahead will deploy critical infrastructure in locations where it is most needed, it is reasonable to conclude that these stations will be used, useful and enable new EV adoption.

Charge Ahead – Electric Vehicles would accelerate EV adoption by helping overcome the familiar “chicken-or-the-egg” market coordination problem: prospective EV owners are reluctant to purchase an EV in the face of limited infrastructure, while prospective hosts of EV charging stations cannot see a business case where too few EVs are in use. This problem is acute for DC fast charging, which has high upfront costs. However, scholarly literature shows that improved

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<sup>11</sup> Exhibit 2, Direct Testimony of Patrick E. Justis at 17, 31-39.

<sup>12</sup> *Id.* at 23-27.

<sup>13</sup> Exhibit 300, Rebuttal Testimony of Cherylyn Kelley at 3-4.

<sup>14</sup> Exhibit 651, Surrebuttal Testimony of James Ellis at 7-8.

access to infrastructure will accelerate EV adoption. In Cases ER-2016-0285 and ET-2016-0246, Sierra Club witness Douglas Jester presented research finding that not only does the increased supply of more EVs drive the deployment of more public charging and vice-versa, but that a financial subsidy given to infrastructure investment will increase EV sales by more than twice the amount of the increase if the financial incentive is provided for EV purchase.<sup>15</sup> This research is bolstered by real-world experience in the state of Missouri.<sup>16</sup> By pulling the infrastructure “lever,” the Charge Ahead program would help overcome the market coordination issue and drive vehicle adoption, thereby accelerating the realization of EV benefits.

***ii. The Electric Vehicle program design maximizes benefits and minimizes costs, and the program size is modest in light of the anticipated need and projected benefits.***

Prior to this case and throughout the technical workshops, Ameren performed a thorough cost-benefit analysis for the Charge Ahead program and, using reasonable, well-researched inputs for driver behavior and electricity system costs, found that each EV represents positive value to the system and that the likely program benefits far outweigh its costs.<sup>17</sup> In the context of a pilot program, any cost benefit assessment should be directional as opposed to absolute. The Commission should ask: does Charge Ahead on the whole move us in a direction that is consistent with the interests of rate-payers?

Confirmation and quantification of benefits will, of course, occur during the program term; the fact that net benefits are highly likely justifies the minimal risk of Ameren’s modest infrastructure investment. Moreover, the fact that Ameren’s analysis is consistent with other,

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<sup>15</sup> See Item No. 130, Case No. ET-2016-0246, Exhibit 500, Direct Testimony of Douglas Jester at 20-21 (citing to Li S et al., *The Market for Electric Vehicles: Indirect Networks Effects and Policy Design*, Journal of the Association of Environmental and Resource Economists 4, no. 1 (March 2017) ((finding also that “the increased availability of public charging stations has a statistically and economically significant impact on EV adoption decisions.”)).

<sup>16</sup> Exhibit 2, Direct Testimony of Patrick E. Justis at 31; Exhibit 3, Surrebuttal of Patrick E. Justis at 12-14.

<sup>17</sup> Exhibit 6, Direct Testimony of Steven M. Wills at 18-36; Exhibit 7, Surrebuttal Testimony of Steven M Wills at 18-41.

similar analyses is also persuasive.<sup>18</sup> The Commission should disregard Staff's criticisms of the Company's cost-benefit assumptions, as those criticisms are either contrary to the record, unsupported by record, and/or a case of nitpicking which misses the point of the assumptions.<sup>19</sup> And, even using some of Staff's assumptions, the EV grid-value is still positive.<sup>20</sup>

More broadly, it is critical to recognize that a basic *system* of infrastructure is needed to enable EV adoption, and, in turn, to enable *system-wide* benefits. A new Charge Ahead fast charging station in Jonesburg may allow a daughter in St. Louis to visit her mother in Colombia, resulting in a new EV driver. The grid benefit from that EV may come primarily from overnight charging in St. Louis, but it is made possible by the Jonesburg station. In other cases, the same may result from new workplace charging, or multi-family home charging solutions. Charge Ahead must be understood in this context, where the network effects of EV charging support EV adoption and its related benefits, benefits which can be maximized through rates and technology solutions.

It is also key to place the Charge Ahead – Electric Vehicles program budget in context. By any measure, the program size is reasonable. First, in the context of the benefits projected by Ameren's analysis, the program is modestly-sized. In other words, there is significant headroom between the out-year projections of EV benefits and anticipated program spend.<sup>21</sup> The program's size is likewise modest in light of the anticipated need for EV charging. To take just one example,

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<sup>18</sup> See, e.g., MJ Bradley and Associates, *Plug-in Electric Vehicle Cost-Benefit Analysis: Michigan* (August 2017); MJ Bradley and Associates, *Plug-in Electric Vehicle Cost-Benefit Analysis: Minnesota* (July 2018); Energy and Environmental Economics (E3), *California Transportation Electrification Assessment Phase 2: Grid Impacts* (October 2014); Kinter-Meyer, Schneider, Pratt, *Impacts Assessment of Plug-in Hybrid Vehicles on Electric Utilities and Regional U.S. Power Grids* (November 2007).

<sup>19</sup> Exhibit 7, Surrebuttal Testimony of Steven M. Wills, at 18-22. Staff's suggestions at hearing that charging will have serious system impacts are also misplaced. Even in California, which now has over 420,000 EVs on the road, the adverse grid impacts have been *de minimis*. Only 0.17% of EVs have triggered the need for a distribution system upgrade, and the costs associated with EV charging account for less than one hundredth of one percent of total distribution capital expenditures. See Synapse Economics, *Electric Vehicles Still Not Crashing the Grid: Updates from California* (March 2018).

<sup>20</sup> *Id.* at 38.

<sup>21</sup> Exhibit 7, Surrebuttal Testimony of Steven M. Wills at 49.

the National Renewable Energy Lab projects that 200,000+ EVs will be on Missouri roads by 2030, requiring the support of an estimated 5,900 workplace charging ports, 4,100 public charging ports, and 370 DC fast charging ports.<sup>22</sup> Charge Ahead will meet only a fraction of this anticipated need. Finally, the program spend is on par with peers on a total spend basis and when assessed across number of customers and program term.

State	Utility	Approved	Budget (\$)	Customers	Term (yrs)	\$ / customer / yr
MO	Ameren	[proposed]	11,000,000	1,260,000	5	1.75
FL	Duke Energy	2017	8,000,000	1,800,000	5	0.89
UT	RMP	2017	10,000,000	875,000	5	2.29
OH	AEP	2018	10,000,000	1,500,000	4	1.67
NV	NV Energy	2018	4,458,810	2,400,000	1	1.86
MA	Eversource	2017	45,000,000	1,400,000	5	6.43

Finally, the program design will limit its costs. The incentive-based program structure means that the program is market-driven. Limiting incentive levels to 50% for Level 2 (up to \$5k) and DCFC (up to \$25k) means that participating site hosts will have “skin in the game.” Both program elements will reduce risks to ratepayers and select for committed program participants. Finally, the direct current fast charging corridor portion of Charge Ahead will leverage funding that is available under the Volkswagen Environmental Mitigation Trust (“EMT”) and stretch those funds further than would otherwise be possible.<sup>23</sup> In testimony, Staff contends that the corridor component of Charge Ahead – Electric Vehicles should be rejected as duplicative because the VW EMT provides more than enough funding for a fast charging backbone across the state.<sup>24</sup> This assessment fails to appreciate the facts on the ground; funding for EV charging from VW EMT is limited by VW settlement terms to 15 percent (or just over \$6M) and is woefully inadequate to

<sup>22</sup> Exhibit 651, Surrebuttal Testimony of James Ellis at 5.

<sup>23</sup> Exhibit 2, Direct Testimony of Patrick E. Justis at 35-36.

<sup>24</sup> Exhibit 102, Rebuttal Testimony of Byron Murray at 10.



support the minimum practical network designed by stakeholders (including Sierra Club and NRDC).<sup>25</sup>

***iii. The cost recovery approach for Charge Ahead – Electric Vehicles is reasonable.***

The Company proposes to treat costs associated with Charging Ahead – Electric Vehicles as a regulatory asset, with recovery to be considered in future rate cases.<sup>26</sup> This is a reasonable method to account for a new, market-driven program like Charge Ahead. A future prudence determination will incentivize careful program implementation by the Company, protect Ameren customers, and permit parties to review actual program costs.<sup>27</sup>

This accounting treatment is familiar to the Commission<sup>28</sup>, and has been applied elsewhere in the EV context. In 2010, for example, the Michigan Public Service Commission (“MPSC”) approved a regulatory asset for a rebate-driven DTE Energy EV program.<sup>29</sup> Two additional programs are now before the MPSC that also request approval of a regulatory asset for accounting purposes<sup>30</sup>—a request that has the support of nearly all engaged parties—as well as a program proposal before the Minnesota Public Utilities Commission.<sup>31</sup>

The proposed accounting treatment also has some other benefits. The regulatory asset approach would ensure the Company will continue to consider non-ownership program models

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<sup>25</sup> See, e.g., Surrebuttal Testimony of Patrick E. Justis at 8-9.

<sup>26</sup> Exhibit 6, Direct testimony of Steven M. Wills on behalf of Ameren Missouri at 44.

<sup>27</sup> See *id.* at 54 (comparing the Company’s proposed cost recovery approach with those approved for utility-driven EV programs in Ohio, Massachusetts and Utah, where utilities will recover costs without any regulatory lag through a dedicated rider).

<sup>28</sup> Exhibit 7, Surrebuttal Testimony of Steven M. Wills at 55-56.

<sup>29</sup> Opinion and Order, In the matter of the application of The Detroit Edison Company for approval of its experimental electric vehicle tariff, Case No. U-16406, Michigan Public Service Commission (filed August 10, 2010); see also Order Allowing Tariff Revisions to Become Effective Subject to Conditions, Docket No. UE-160082, Washington Utilities and Transportation Commission at 5 (approving EV pilot program for Avista with understanding that the utility would seek cost recover in a future rate case proceeding).

<sup>30</sup> See Michigan Public Service Commission Cases No. U-20162 (DTE Energy \$13M EV program proposal) and 20134 (Consumers Energy \$10M EV program proposal).

<sup>31</sup> See Minnesota Public Utilities Commission, Docket No. E002/M-18-643.

going forward.<sup>32</sup> It also could enable a performance-based approach of the kind suggested by the Office of Public Counsel.<sup>33</sup> Sierra Club and NRDC agree with OPC that transportation electrification presents a good opportunity to apply alternative cost-recovery approaches, including performance-based approaches that better align utility and shareholder incentives with delivering the benefits upon which EV investments are premised. However, individual vehicle sales—which are multi-factorial decisions that cannot be easily attributed to any one factor—are not the right metric for judging the performance of a utility transportation electrification program.

Instead, better metrics include those included in a proposal by San Diego Gas & Electric to the California Public Utilities Commission: (1) successful charging station deployment (including deployment in low-income communities); and (2) success in pushing EV load to off-peak hours.<sup>34</sup> Premising a utility recovery on these measurable metrics can maximize the program benefits. Sierra Club and NRDC believe that performance-based rate-making should be a continuing conversation, but is not appropriate at this time given the modest size of the Charge Ahead program, the early stage of the EV market in Missouri, and the fact that the EV-related efforts by the state’s utilities are currently at a “pilot stage.” Learning from the Charge Ahead program, and others, should inform efforts to develop alternative cost recovery approaches.

***iv. The Charge Ahead – Electric Vehicles program should be modified to improve transparency and ensure benefits for all customers.***

To improve the Charge Ahead – Electric Vehicles program, Sierra Club and NRDC recommend two slight modifications: first, to improve program transparency; and, second, to ensure the benefits of the program will be equitably distributed.

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<sup>32</sup> Tr. Vol. 2, p. 24-25, lines 1-2 (Ameren counsel explaining that the Company considered revising their proposal in light of the recent Court of Appeals decision to re-visit ownership of charging stations).

<sup>33</sup> Exhibit 200, Rebuttal Testimony of Geoff Marke at 20-22.

<sup>34</sup> San Diego Gas & Electric, Advice Letter 3287-E, October 5, 2018.

In testimony, Mr. Justis explains that the Company’s EV team would be responsible for program implementation, including “tracking and reporting,” but he does not elaborate on the frequency or nature of the reporting.<sup>35</sup> To promote transparency and learning-by-doing in this pilot program, the Company should commit to more regular reporting and clarify its data collection plan. Metrics to be collected should include: station utilization, prices paid by EV drivers and site host pricing models/strategies, equipment providers selected, installation costs by equipment provider, and outage incidents by equipment provider. The collected data should be reported annually to the Commission and made public for review by any interested party.

In rebuttal testimony, the Division of Energy recommended that Ameren work to ensure that the EV Program will equitably serve its customers by deploying a minimum percentage of Charge Ahead – Electric Vehicles infrastructure in low income or disadvantaged communities.<sup>36</sup> Sierra Club and NRDC support the Division’s recommendation and suggest that it be addressed in the course of program implementation. This recommendation was also met with support by Ameren in its surrebuttal testimony.<sup>37</sup>

**b. The Charge Ahead – Business Solutions program should be approved.**

- i. The Business Solutions program would support deployment of proven, market-ready electric vehicle technologies using a familiar, incentive-driven approach.*

With the Business Solutions program, Ameren proposes to support the adoption of efficient electric technologies through incentives that will support vehicle purchase and installation of associated infrastructure. The program targets electrification of 2,400+ pieces of equipment during

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<sup>35</sup> Exhibit 2, Direct Testimony of Patrick E. Justis at 37.

<sup>36</sup> Exhibit 300, Rebuttal testimony of Cherylyn Kelley at 10-11.

<sup>37</sup>Exhibit 3, Surrebuttal testimony of Patrick E. Justis at 20.

its five-year term, including forklifts, airport ground support equipment, truck stops and truck refrigeration units.<sup>38</sup>

From the record evidence<sup>39</sup> and outside assessments<sup>40</sup>, there is little question that electrification of this equipment will improve efficiency, support grid benefits, reduce dependence on petroleum and improve air quality to the benefit of Ameren customers and all Missourians. The question for the Commission's review then is whether Business Solutions will *accelerate* adoption of these technologies. This question is best answered by assuring that the Program is targeting electrification of equipment types that are ripe for electrification. In this case, each of the technologies targeted in Business Solutions is demonstrated and market-ready. Numerous technology assessments—dating back to 2015—have found that airport ground support equipment, forklifts, and cargo-handling equipment are well-suited for broad market development.<sup>41</sup> This assessment is consistent with the testimony of Ameren, Renew Missouri, and the Office of Public Counsel.<sup>42</sup>

Moreover, incentive-based approaches to conventional energy efficiency have proven successful in Missouri as demonstrated by the MEEIA programs.<sup>43</sup> The Commission should permit this familiar, tested approach for the Business Solutions program. In many cases, the total cost of ownership for an electric technologies can be lower than for conventional fuels due to maintenance and fuel cost savings, although electric technologies currently have higher upfront vehicle costs. Put another way, Business Solutions could help meet the higher up-front capital requirements of

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<sup>38</sup> Exhibit 4, Direct Testimony of David Pickles at 16-18.

<sup>39</sup> *Id.* at 5-9.

<sup>40</sup> California Air Resources Board, “Mobile Source Strategy” (May 2016).

<sup>41</sup> California Air Resources Board, “Revised Proposed 2016 State Strategy for the State Implementation Plan” at 105, 112; California Air Resources Board, “Technology Assessment: Mobile Cargo Handling Equipment” (November 2015).

<sup>42</sup> *See* Exhibit 4, Direct Testimony of David Pickles at 10-14; Exhibit 400, Surrebuttal Testimony of James Owen at 6-8; Rebuttal Testimony of Geoff Marke at 6-7.

<sup>43</sup> *See, e.g.*, Exhibit 400, Surrebuttal Testimony of James Owen at 9.

electric technologies, allowing customers—including government agencies—to then lock in the lower lifetime costs. These lifetime savings can be re-invested into additional purchases of electric buses, creating a positive economic cycle, where customers can continue to electrify their fleets and further drive down operational costs.

***ii. The benefits of the Business Solutions program outweigh costs.***

As with Charge Ahead – Electric Vehicles, the cost-benefit analysis performed by Ameren for the Business Solutions Program is directionally positive.<sup>44</sup> The program is right-sized given the results of that analysis<sup>45</sup>, and reasonably-sized given market need. Moreover, only a sub-set of the benefits that EVs will provide to the Company’s ratepayers and society are factored into the analysis, making the projected benefits conservative.

Business Solutions will jumpstart electrification of on- and off-road medium and heavy-duty vehicles, to the benefit of frontline communities that often bear the brunt of transportation pollution from freight facilities like warehouses, distribution centers and airports. In addition to significant health benefits, medium- and heavy-duty vehicles are well-suited to support the electric grid and facilitate the integration of renewables due to their predictable duty-cycles (i.e., it is possible to know with relatively certainty when the vehicles will be in use and, as a result, it is easy to know when they can be plugged in and leveraged as a grid resource).

***iii. The cost recovery approach for Charge Ahead-Business Solutions is reasonable.***

The Company proposes to treat costs associated with Charging Ahead – Business Solutions as a regulatory asset, with recovery to be considered in future rate cases.<sup>46</sup> This is a reasonable

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<sup>44</sup> Exhibit 4, Direct Testimony of David Pickles at 14-18; Exhibit 6, Direct testimony of Steven M. Wills on behalf of Ameren Missouri 37-39, 42.

<sup>45</sup> Exhibit 6, Direct testimony of Steven M. Wills on behalf of Ameren Missouri at 42.

<sup>46</sup> Exhibit 6, Direct testimony of Steven M. Wills on behalf of Ameren Missouri at 44.

method to account for a new, market-driven program like Charge Ahead. As described in Section II.a.iii, above, a future prudency determination will incentivize careful program implementation by the Company, protect Ameren customers, and permit parties to review actual program costs.

***iv. The Charge Ahead – Business Solutions program should be modified to improve transparency.***

To promote transparency and learning-by-doing in the Program, the Company should commit to more regular reporting. In testimony, Mr. Wills identifies the data to be collected as part of the Charge Ahead – Business Solutions program and explains that the Company will provide a final report.<sup>47</sup> Sierra Club & NRDC recommend that the collected data be reported annually to the Commission and made public for review by any interested party, regardless of its inclusion in any request for cost recovery in a rate-case.

**III. Conclusion**

For the reasons discussed above, Sierra Club and NRDC respectfully request that the Commission approve the tariff sheets proposed by Ameren and establish the accounting authority that will permit implementation of the Charge Ahead program, including the minor program modifications described herein to better serve all customers and improve program transparency.

**Respectfully submitted,**

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<sup>47</sup> Exhibit 6, Direct Testimony of Steven M. Wills at 40.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and electronically mailed to all counsel of record on this 7th day of January, 2019.

/s/ Joseph Halso  
Joseph Halso