

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

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| In the Matter of the Application |) | |
| Of Union Electric Company |) | Case No. ET-2016-0246 |
| d/b/a Ameren Missouri for Approval |) | Tracking No. YE-2017-0030 |
| of a Tariff Setting a Rate for |) | |
| Electric Vehicle Charging Stations |) | |

JOINTLY PROPOSED UNDISPUTED MATERIAL FACTS

COMES NOW the Staff of the Missouri Public Service Commission (Staff) on behalf of Union Electric Company d/b/a Ameren Missouri; Staff of the Missouri Public Service Commission; Office of the Public Counsel; Brightergy, LLC; ChargePoint, Inc; Consumers Council of Missouri; Kansas City Power & Light Company; KCP&L Greater Missouri Operations Company; Midwest Energy Consumers Group; Missouri Division of Energy; Missouri Industrial Energy Consumers; Natural Resources Defense Council; and Sierra Club, and proposes that the following are undisputed material facts in the above-referenced matter:

1. Ameren Missouri intends to install six (6) charging islands, five (5) along the I-70 corridor and one (1) along Highway 54.
2. Each charging island will feature Level 2-AC and DC Fast Charging stations. The charging islands at each site would allow access to every type of industry-standard, non-proprietary electric vehicle plug. The chargers would transfer electricity from a charging station to electric vehicles (either fully electric or plug-in hybrid).
3. 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,

would potentially discriminate 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.

4. Ameren Missouri subsequently submitted to the Commission an electric vehicle tariff that applies a per kWh rate to the level 2 charging stations and a per minute rate to the DC Fast Charging charging stations. The revised tariff at issue does not address third-party private charging station rates for residences and businesses such as hotels.

5. Ameren Missouri initiated and completed a competitive solicitation process for procurement of electric vehicle charging equipment and services through a Request for Proposal.

WHEREFORE, Staff prays the Commission will accept these *Undisputed Material Facts* on behalf of the parties to this matter; and grant such other and further relief as it considers just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

Whitney Payne

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 23rd day of December, 2016, to all counsel of record.

/s/ Whitney Payne