

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) **File No. ET-2016-0246**
for Approval Of a Tariff Setting a Rate)
for Electric Vehicle Charging Stations)

**JOINT POSITION STATEMENT OF
NATURAL RESOURCES DEFENSE COUNCIL AND SIERRA CLUB**

Come now Natural Resources Defense Council and Sierra Club and for their *Position Statement on the List of Issues, List and Order of Witnesses, Order of Opening Statements and Order of Cross-Examination* filed on January 4, 2016 by Ameren Missouri on behalf of itself, Missouri Public Service Commission Staff, Missouri Division of Energy, Kansas City Power & Light Greater Missouri Operations Company, Natural Resources Defense Council (“NRDC”), and Sierra Club, respectfully state as follows:

1. Commission Jurisdiction

Does the Commission have jurisdiction to regulate utility-owned and operated electric vehicle charging stations operated in a utility’s service area?

NRDC and Sierra Club position:

Yes. The Commission has jurisdiction to regulate utility-owned and operated electric vehicle charging stations that are publicly available within a utility’s service area.¹ However, under Missouri law, non-utility owners and

¹ See, e.g., *Sierra Club and Natural Resources Defense Council Response to Order Directing Filing*, File No. ET-2016-0246 (filed October 21, 2016), at 2-8.

operators of EV charging stations are not public utilities subject to the Commission's jurisdiction solely by virtue of operation of EV charging stations.

2. Public Policy

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?

NRDC and Sierra Club position:

Yes, there are public benefits realized from the installation of electric vehicle charging stations and the growth of transportation electrification.

These benefits include, but are not limited to: electricity grid and utility customer benefits, including the potential for increased system flexibility and reliability, increased asset utilization and dilution of fixed costs, downward pressure on electric rates for all utility customers, and greater integration of renewable generation; as well as general public benefits, including reduced oil dependence and greater energy security, air pollution reduction and public health benefits, and carbon emissions reductions and climate change mitigation.

3. Rates

Does Ameren Missouri's proposed tariff represent the proper rate design for its EV charging station pilot project?

NRDC and Sierra Club position:

Yes, the proposed tariff represents a reasonable rate design for its EV charging station pilot project.

The tariff for AC-Level 2 stations, which is based on a volumetric per kWh measure, avoids unequal treatment of EVs and EV drivers based on their on-board charger—a primary determinant of charging power level for non-DC charging. The tariff for DC-Level 2 stations, assessed on a per-minute basis, fairly approximates the value for time spent charging, while incenting vehicle turnover and station utilization. Both rates reasonably apportion costs to EV drivers while allowing them to generally realize fuel cost savings relative to gasoline.

WHEREFORE, the Natural Resources Defense Council and Sierra Club respectfully file their *Statement of Positions*.

Respectfully submitted,

/s/ Joseph Halso

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 6th day of January, 2016, to all counsel of record.

s/ Joseph Halso
Joseph Halso