

a. Has Ameren Missouri provided sufficient evidence that there is a need for the program?

Sufficient evidence has been provided that there is a need for the Charge Ahead – Electric Vehicles Program. While there are an increased number of charging stations in the more densely populated areas of the state and on some roadways, the infrastructure is inadequate elsewhere. The cost of building charging stations is an impediment to private industry investment in the electric vehicle charging station (“EVCS”) market, as well as a barrier to creating an environment in which Missourians can be secure and comfortable using electric vehicles – or in which non-residents (e.g., tourists, shippers) can have confidence in driving electric vehicles through the state. The lack of EVCSs in critical locations and the insufficient availability of funds to build out the infrastructure both threaten Missouri’s preparedness to meet the growing market trend toward electric vehicles.

Ameren Missouri and the proponents of Charge Ahead – Electric Vehicles program have provided competent and substantial evidence supporting the rebate program. The program is reasonable and in the public interest.

b. Has Ameren Missouri provided sufficient evidence that the program is cost effective?

DE takes no position on this issue at this time but reserves the right to do so following evidence presented at the hearing.

c. If the program is approved, what is the appropriate cost recovery mechanism?

DE takes no position on this issue at this time but reserves the right to do so following evidence presented at the hearing.

d. If the program is approved, what conditions, if any, should be imposed by the Commission?

DE recommends allocating 10% of the total program budget towards EVCS deployment in underserved and low-income communities within the Company's service area. This allocation supports equitable access to charging stations for residents of these communities and those drivers traveling to or through these communities.

2. Should the Commission approve, reject, or modify Ameren Missouri's Charge Ahead – Business Solutions Program?

DE takes no position regarding Ameren's Business Solutions Program at this time but reserves the right to do so following evidence presented at the hearing.

3. Should the Commission grant the variances requested by Ameren Missouri?

DE takes no position on this issue at this time but reserves the right to do so following evidence presented at the hearing.

WHEREFORE, the Missouri Division of Energy respectfully files its *Statement of Positions*.

Respectfully submitted,

/s/ Michael Lanahan

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 27th day of November, 2018.

/s/ Michael Lanahan

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