

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

In the Matter of a Working Case to Evaluate)
Potential Mechanisms for Facilitating) **File No. EW-2019-0229**
Installation of Electric Vehicle Charging Stations)

**COMMENTS OF THE MISSOURI DIVISION OF ENERGY IN RESPONSE TO
*REQUEST FOR ADDITIONAL COMMENTS***

COMES NOW the Missouri Division of Energy (“DE”) and, in response to the Missouri Public Service Commission (“Commission”) Staff’s March 22, 2019 *Request for Additional Comments* in the above-captioned matter, states as follows:

Introduction

DE appreciates the additional opportunity to provide comments in this working docket. There was relatively broad consensus at the workshop held on March 21, 2019 that the Commission’s policy towards the deployment of electric vehicle (“EV”) charging infrastructure should be flexible. As noted in DE’s initial comments filed on March 14, 2019, no one model may be appropriate in every instance. Therefore, DE recommends that the Commission evaluate EV charging station (“EVCS”) deployment models, and utility cost recovery for EVCS investments, on a case-by-case basis. EVCS deployment by utilities may be beneficial in higher-cost areas that would not otherwise be served by a competitive market. This is consistent with an investor-owned electric utility’s obligation to provide “adequate” service. Elsewhere, the “make ready” model may support the provision of adequate service. Regardless of the model offered by utilities or evaluated by the Commission, investor-owned utilities are uniquely positioned to plan, support and drive EV deployment in Missouri.

The workshop – and Staff’s subsequent request – raised two additional topics that this filing will address: customer education and a potential rulemaking.

Customer Education

During the March 21, 2019 workshop, a number of parties commented on the opportunities to provide, and the need for, customer education. An endeavor as important as EV customer education should consider several issues. A process to identify and document specific EV educational goals may be an initial task for interested stakeholders. Such goal identification should include an effort to seek commonly shared interests, such as ensuring that customer education is performed effectively, factually, and efficiently. Other common goals may include evaluating specific messaging and media, minimizing duplication of efforts and resources, and optimizing the use of the unique knowledge, interests, skills, abilities, and customer engagement opportunities held by stakeholders. Effective EV education may require tailoring of specific educational channels to address various customer demographic groups. Consideration should be given to identifying leading EV educational practices and programs to most successfully educate the greatest breadth of Missouri citizenry on the economic, environmental, personal, societal, and other benefits of vehicle electrification.

Some questions that should further be considered in the Missouri customer EV education dialogue include:

- **Who is best suited to conduct education on EVs?** For example, it may be that automakers and automotive dealers can provide education with utility engagement and support. Municipalities and other forms of government may be engaged as partners in an educational role, along with institutions of

higher learning, technical schools, and others. Organizations that engage with senior citizens may also provide a trusted and accessible venue for educational deployment. Anticipated growth in secondary EV markets may attract lower-income households to EVs, and partners that provide support to such consumers, including community action agencies, may be positioned to provide needed consumer education regarding the attributes of EVs.

- **What are the leading practices for educating customers on EVs and who may already be engaging in EV education within Missouri?** Missouri's higher educational institutions may be good partners for identifying leading practices in educating a diverse citizenry on the many merits of EVs. Technical organizations and consortiums accessible by various partners may have valuable educational insights as well. Such partners may be able to assist in designing programs that can aid in effective educational targeting to various customer segments.
- **What role can customer surveys play to identify educational gaps regarding, and informational barriers to, EV adoption?** Utilities have extensive expertise in developing survey instruments to measure customer satisfaction, opportunities for improvement, and other metrics. Adding customer survey questions regarding EV deployment within the state may be a relatively simple way to better understand customer awareness, unmet needs, barriers to EV deployment, and issues.
- **Are there other initiatives that utilities can leverage to support EV adoption?** Could combined utility (or other partner) efforts with regards to

education or other activities more effectively support EV adoption in Missouri?
Are grant opportunities or other funding available to stakeholders to advance EV education?

- **How should educational success be measured?** What, if any, measurements of performance or evaluative criteria should an educational program design include, and who may be most interested in such evaluations? Have any EV educational programs been evaluated for effectiveness, and are there lessons to be learned from such evaluations?

These issues have not been entirely unaddressed to date, as evidenced by <https://cleanchargenetwork.com/>. DE supports additional dialogue in a collaborative format on education and other EV-related issues.

Rulemaking

A rulemaking specific to EV charging infrastructure may not be necessary or appropriate at this time. In general, EV infrastructure proposals should be evaluated on a case-by-case basis as they are brought before the Commission. Should an EV rulemaking go forward, DE recommends that any resulting rule provide the Commission with a wide range of regulatory tools to support EV deployment in Missouri. However, other rule proposals under consideration at the Commission relate to the deployment of EV infrastructure.

In Case No. EW-2017-0245, Staff proposed draft rules to require the analysis of distributed energy resources (“DERs”) within the context of integrated resource plans (“IRP”). Staff’s definition of DERs would have included EVs. Subject to DE’s comments on those drafts, DE generally supports the concept of planning for DERs, as well as the

inclusion of EVs in the definition of DERs under DER planning rules. As discussed at the workshop and in other venues, EVs have the potential to impact system planning needs. Planning for – and managing – the integration of EVs should be incorporated in the IRP process. DE supports additional discussion of a distribution system planning rule within the IRP process.

DE also notes the existence of Case No. AW-2018-0385, which was established to consider changes to the Commission’s rules on promotional practices. That outstanding docket is relevant because, as DE noted at the Commission’s workshop on March 21, 2019 in the present case, support for EV charging infrastructure should not be viewed as undermining utility demand-side programs. Both EV charging and demand-side programs are important aspects of shaping or shifting load such that the utility system is used in an economically efficient manner while providing customer benefits. Utilities should be enabled to support the automotive sector’s transition to EVs in a way that creates system and customer benefits, enables adequate access to transportation needs across the state, reduces dependence on fuel imports, and improves environmental quality. As the Commission considers revisions of its promotional practices rules, DE recommends (as it did in Case No. AW-2018-0385) that the rules exempt from the “load building” definition those activities that can be beneficial to a utility system and its customers.