

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

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

REQUEST FOR ADDITIONAL COMMENTS

COMES NOW the Staff (“Staff”) of the Missouri Public Service Commission (“Commission”), by and through counsel, and states the following:

1. On February 7, 2019, the Commission opened this docket to evaluate potential mechanisms for facilitating the installation of electric vehicle charging stations; and on March 21, 2019, a workshop was held to gather insight from interested stakeholders.

2. Staff now asks all interested stakeholders, those who were able to attend the workshop as well as those who were unable to attend, to submit any additional comments on the topics of discussion no later than April 30, 2019. Specifically Staff asks stakeholders to address:

a. Additional thoughts stemming from common themes of the workshop discussions:

- i. Pilot Programs
- ii. Data Gathering
- iii. Customer Education
- iv. Cost/Benefit Analysis

- v. Adoption Rates/Needs of Customers at Present
 - vi. Cost Recovery/Rate Design/Incentives
 - vii. Flexibility and Choice
- b. Any comments on the questions Staff proffered at the March 21 workshop:
- i. What is the “Make Ready Model” – what should be included in the “Make Ready”?
 - 1. Line Extension for EV Charging Station
 - 2. Option to waive line extension charges for separately metered EV charging stations that meet specific public policy considerations.
 - 3. What public policy considerations must be met for an EV charging station to receive the incentive?
 - ii. Ownership Models
 - 1. Third Party
 - 2. IOU
 - a. IOU Ownership With/Without Subsidies
 - iii. Potential Policies for EV Charging Infrastructure Implementation That Provides the Most Benefit to the Grid

1. What policies will promote deployment of EV charging stations?
2. What type of technology/charging equipment needs to be utilized?
 - a. Energy Star Certified EV Charging Station Requirements
 - i. Network Communications for EV Charging Stations
 - ii. Commercial – Level 2 and DC Fast Charging
 - iii. Residential – Level 2 Charging Stations
3. What is the interoperability of the EV charging station?
4. Energy Storage with EV charging stations for mitigation of demand charges.
5. What are the anticipated system impacts of EV charging on-peak on the grid?
6. What are the potential impacts on the local distribution system?
 - a. Distribution System Upgrade Requirements
 - i. Smart Meter Requirements

7. Ratemaking Policies – What will facilitate the most benefit for the grid?

a. Time of Use Rates Specific to EV Charging

c. The need for a rulemaking to address electric vehicle charging and the infrastructure to support it. Stakeholders may also submit exemplar rules from other jurisdictions.

3. Staff appreciates the participation of the stakeholders to this point and looks forward to reviewing the additional comments to be submitted. Once Staff has reviewed the comments it will notify the stakeholders through this docket of the next steps.

WHEREFORE, Staff requests that the Commission order any interested stakeholder to file its additional comments in File No. EW-2019-0229, no later than April 30, 2019; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

Whitney Payne

Senior Counsel

Missouri Bar No. 64078

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 751-8706 (Telephone)

(573) 751-9285 (Fax)

whitney.payne@psc.mo.gov

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 22nd day of March, 2019, to all counsel of record.

/s/Whitney Payne