

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

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

STAFF’S COMMENT

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Comment* in this matter hereby states:

1. On August 15, 2016, Union Electric Company d/b/a Ameren Missouri filed an *Application for Approval of a Tariff Authorizing a Pilot Program for Electric Vehicle Charging Stations*. Staff filed its recommendation September 28. On that same date two of the intervening parties, National Resources Defense Council (NRDC) and Sierra Club also filed their recommendations proposing certain modifications to the proposed tariff. Ameren Missouri filed a *Response* to the recommendations, October 4, including an Attachment A, reflecting changes recommended by NRDC and Sierra Club. The Commission filed an order rejecting Ameren Missouri’s original tariff filing and authorizing Ameren Missouri to file a new tariff consistent with Attachment A of its *Response*.

2. Ameren Missouri filed a revised tariff consistent with Attachment A of its *Response* as a proposed tariff revision October 7. The Commission issued an order permitting parties to file responses or comments no later than October 13. Staff now files its *Comment*.

3. Staff notes that Ameren Missouri's initial tariff rates for both the Level 2-AC charging and the Level 2 –DC charging were based on 15 minute intervals. However, in Ameren Missouri's new tariff filed on October 7th the Level 2 –AC charging rate is based on per kWh and the Level 2-DC charging rate is based on per minute of connection time. Staff understands NRDC and the Sierra Club's recommendation is for either a per kWh or a per minute rate instead of the original per 15 minute rate; however, Ameren Missouri's new tariff incorporates both the per kWh and per minute rate methods. Staff would also recommend that the Commission request that a per minute rate be based on the total time the car is charging rather than the total time the car is connected to the station as it is currently determined in the proposed tariff. Staff understands that this would be consistent with NRDC and Sierra Club's recommendation.

4. Therefore, Staff suggests that the same metric, either a per kWh or per minute method, be applied to both Level 2-AC and the Level 2 –DC charging and, if a per minute rate is chosen, that it be based on the total charging time as opposed to the total connection time.

WHEREFORE, Staff provides the Commission with this *Comment*, asks the Commission to apply either a per minute or per kWh metric, with the suggested modification to a per minute metric; and prays the Commission will grant such other and further relief as it considers just in the circumstances.

/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 13th day of October, 2016, to all counsel of record.

/s/ Whitney Payne _____