

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri for Approval of) File No. ET-2021-0020
Efficient Electrification Program.)

**APPLICATION TO INTERVENE
OF THE MISSOURI PROPANE GAS ASSOCIATION**

COMES NOW the Missouri Propane Gas Association (“MPGA”), by and through counsel, pursuant to Commission Rule 4 CSR 4240-2.075, and respectfully files its Application to Intervene in this matter. In support of this Application, MPGA states as follows:

1. On October 27, 2020, Union Electric d/b/a Ameren Missouri filed an *Application, Request for Variances, and Request for Accounting Authority* ("*Application*") which would allow the Company to implement tariffs that enable an efficient electrification program pilot for certain select types of heavy equipment and defer costs associated with the program.

2. MPGA is a not-for-profit trade association representing its local propane provider members and affiliated businesses who sell propane or propane appliances and equipment in Missouri. Through advocacy, education, and leadership, MPGA assists its members by supporting beneficial public policy, promoting safety education, and raising public awareness of the benefits of propane.

3. Correspondence, communications, orders, and the decision in this matter should be addressed to:

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4. On October 28, 2020, the Commission issued its *Order Setting An Intervention Deadline, Directing a Staff Recommendation, and Setting a Time For Responses*. In that Order, the Commission stated that any application to intervene shall be filed no later than November 16, 2020.

5. In its Application, Ameren Missouri is requesting this Commission to approve a “New Business Solutions Pilot Program” to promote and provide incentives for customers to purchase TRU Electric Ports and Class I Electric Lift trucks having capacity >6,000 lbs. Specifically for lift trucks, the proposed customer incentives are \$2,500 per eligible lift truck purchased, and \$1,250 per eligible lift truck leased. The pilot program budget of \$1.42 million would support the deployment of 375 new electric lift trucks.

6. MPGA members are small business owners. They have payrolls to meet and bills to pay and exist to provide safe and affordable propane products and services to their customers.

7. In some instances, MPGA propane provider members compete with investor-owned electric utilities for customers. For example, many of MPGA’s members provide propane for heavy equipment, like lift trucks (forklifts). They can be powered by propane or electricity. That means there is competition for customers between propane providers and providers of electricity.

8. When it comes to providing power for forklifts, MPGA members directly compete for customers with Ameren Missouri in Ameren Missouri’s service territory. MPGA has direct and immediate interests in this proceeding that are different than the general public and those interests are not currently represented in this matter. Further, a Commission decision to approve the pilot program may have an adverse impact on MPGA and its members.

9. Quite simply, all the propane dealers are asking for from this Commission is a chance to compete fairly on a level playing field. If a Commission-regulated electric utility like Ameren is allowed to promote and provide cash incentives for forklift users to buy new electric forklifts instead of propane forklifts, or switch to electric forklifts from propane forklifts, then the competitive balance could be skewed to the electric utility's favor. The proposed promotion and incentives program could negatively impact MPGA's member propane providers. MPGA opposes any proposal that would interfere with free market competition.

WHEREFORE, MPGA respectfully requests that the Commission grant its Application to Intervene on its behalf and on behalf of its members, entitling it to fully participate in this proceeding.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 16th day of November, 2020.



Terry M. Jarrett