

In the Matter of:

**In the Matter of Union Electric Company d/b/a Ameren Missouri, et al.**

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**ET-2018-0132 VOL. V**

*October 09, 2019*

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BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

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TRANSCRIPT OF PROCEEDINGS

On-The-Record Presentation

October 9, 2019

Jefferson City, Missouri

Volume 5

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In The Matter of the ) File No. ET-2018-0132  
Application of Union Electric )  
Company d/b/a Ameren Missouri )  
for Approval of Efficient )  
Electrification Program )

NANCY DIPPELL, Presiding  
SENIOR REGULATORY LAW JUDGE  
RYAN A. SILVEY, Chairman,  
WILLIAM P. KENNEY,  
DANIEL Y. HALL,  
SCOTT T. RUPP,  
MAIDA J. COLEMAN,  
COMMISSIONERS

REPORTED BY:  
Tracy Taylor, CCR No. 939  
TIGER COURT REPORTING, LLC

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A P P E A R A N C E S

PAULA N. JOHNSON  
1901 Chouteau Avenue, MC 1310  
St. Louis, Missouri 63103  
314.554.3533  
FOR: Ameren Missouri

DIANA C. CARTER  
428 E. Capitol Avenue, Suite 303  
Jefferson City, Missouri 65101  
573.289.1961  
FOR: The Empire District Electric Company

SHAWNA BLIGH  
1101 Riverside Drive  
Jefferson City, Missouri 65102  
573.522.5464  
FOR: Missouri Divison of Energy

HENRY B. ROBERTSON, via phone  
319 N. 4th Street, Suite 800  
St. Louis, Missouri 63102  
314.231.4181  
FOR: NRDC and Sierra Club

TIMOTHY OPITZ  
409 Vandiver Drive, Suite 205  
Columbia, Missouri 65202  
573.825.1796  
FOR: Renew Missouri

ANDREW J. LINHARES, via phone  
3115 S. Grand Avenue, Suite 600  
St. Louis, Missouri 63118  
314.471.9973  
FOR: Renew Missouri

LEWIS MILLS, via phone  
221 Bolivar Street, Suite 101  
Jefferson City, Missouri 65101-1574  
573.556.6627  
FOR: Missouri Industrial Energy Consumers

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MARC D. POSTON  
Department of Commerce & Insurance  
200 Madison Street, Suite 650  
PO Box 2230  
Jefferson City, Missouri 65102  
573.526.1445  
FOR: Office of the Public Counsel

NICOLE MERS  
Department of Economic Development  
200 Madison Street, Suite 800  
PO Box 360  
Jefferson City, Missouri 65102-0360  
573.526.4887  
FOR: Staff of the Missouri Public Service Commission

1 JUDGE DIPPELL: Okay. We can go ahead  
2 and go on the record. Good morning. This is Case  
3 Number ET-2018-0132 in the matter of the application  
4 of Union Electric Company, doing business as Ameren  
5 Missouri, for approval of Efficient Electrification  
6 Program.

7 My name is Nancy Dippell. I'm the  
8 Regulatory Law Judge presiding over this presentation  
9 today. We've come here today because there were  
10 additional tariffs filed with-- in a Stipulation and  
11 Agreement with regard to some EV charging  
12 applications.

13 And the Commission wanted to review the  
14 workshop docket information that was filed on  
15 September 30th and then have the opportunity to hear  
16 about the tariffs and ask any questions. And so  
17 that's what brings us here this morning.

18 We'll begin with entries of appearance.  
19 Ameren?

20 MS. JOHNSON: Good morning. Paula  
21 Johnson appearing on behalf of Union Electric Company,  
22 doing business as Ameren Missouri. 1901 Chouteau  
23 Avenue, St. Louis, Missouri 63103.

24 JUDGE DIPPELL: Commission Staff.

25 MS. MERS: Nicole Mers appearing on

1 behalf of the Commission Staff. And my information  
2 has been provided to the court reporter.

3 JUDGE DIPPELL: Office of Public Counsel.

4 MR. POSTON: Good morning. Marc Poston  
5 appearing for the Office of the Public Counsel.

6 JUDGE DIPPELL: And I have some parties  
7 on the phone. Renew Missouri?

8 MR. OPITZ: Tim Opitz for Renew Missouri.  
9 Andrew Linhares as well.

10 JUDGE DIPPELL: I'm sorry. I didn't  
11 realize Mr. Opitz was in the -- in the room. So I'll  
12 let him make the entry. Sorry about that,  
13 Mr. Linhares. Go ahead.

14 MR. OPITZ: For Renew Missouri, Tim  
15 Opitz. And Andrew Linhares is on the phone as well.

16 JUDGE DIPPELL: Division of Energy?

17 MS. BLIGHT: Shawna Blight -- Shawna  
18 Bligh for Department -- or Department of Natural  
19 Resources, Division of Energy.

20 JUDGE DIPPELL: And then Sierra Club and  
21 National Resources Defense Council is on the phone.  
22 Mr. Robertson.

23 MR. ROBERTSON: Henry Robertson for NRDC  
24 and Sierra Club.

25 JUDGE DIPPELL: And I apologize. I will

1 put the microphone on that in the future. Empire?

2 MS. CARTER: Diana Carter for The Empire  
3 District Electric Company. And my contact information  
4 is on the written entry being provided to the court  
5 reporter.

6 JUDGE DIPPELL: And Missouri Industrial  
7 Energy Consumers. Also, Mr. Mills is on the phone.

8 MR. MILLER: Thank you, Judge. Lewis  
9 Mills with the law firm Bryan Cave Leighton Paisner.  
10 My address is 221 Bolivar Street, Jefferson City,  
11 Missouri 65101. Appearing on behalf of Missouri  
12 Industrial Energy Consumers.

13 JUDGE DIPPELL: I don't know how this is  
14 going to work. I may have to move the speakerphone  
15 over to the witness stand.

16 Is there anyone here from KCPL GMO? And  
17 Spire had asked to be excused, as had ChargePoint and  
18 so they are excused.

19 All right. I generally just thought we  
20 would start by having you all present the tariffs and  
21 tell us about them and the Stipulation and Agreement.  
22 I was hoping we could start with the company.

23 MS. JOHNSON: Thank you, Your Honor.  
24 Chair Silvey, Commissioners, as -- once again, I'm  
25 Paula Johnson. I'm the attorney for Ameren Missouri.

1 With me today are Tom Byrne, senior director of  
2 Regulatory Affairs; Steve Wills, director of Rates and  
3 Analysis; and Pat Justis, manager of Efficient  
4 Electrification Development. In case we have any  
5 specific questions, I may defer to one of them to  
6 address those for you.

7           But on behalf of the Company, I want to  
8 thank you for the opportunity to talk to you today  
9 about the electric vehicle or EV settlement that we've  
10 reached with Commission Staff and the Office of the  
11 Public Counsel that we're asking you to approve.

12           As you know and as an Ameren Missouri has  
13 made clear over the years, we are committed to  
14 spurring EV growth in the state of Missouri. You have  
15 already approved our corridor charging incentive  
16 proposal in this docket to help assuage potential EV  
17 drivers' range anxiety and provide more opportunities  
18 along the main travel corridors in the state.

19           You also initiated an EV workshop to  
20 examine potential models for facilitating additional  
21 EV development in File Number EW-2019-0229. And on  
22 September 30th, 2019, the Commission Staff issued a  
23 report in that workshop docket in which it noted the  
24 following key themes that arose during the workshop.

25           First, any action by the Commission



1 should allow for flexibility. Any action should be  
2 technology neutral to the greatest extent possible.  
3 Robust data collection and the eventual use of that  
4 data are key to successful development. Enhanced  
5 customer education is a must. And approval of pilot  
6 programs may be the best path forward for the -- for  
7 Commission involvement. These workshop observations  
8 are reflected in the Settlement Agreement that Ameren  
9 Missouri reached with Staff and the OPC.

10           To very briefly discuss the program --  
11 there are a lot more nuances in this, but I wanted to  
12 give you a high level -- the main goals for achieving  
13 through the settlement.

14           We are establishing for a three-year  
15 period three additional categories of EV charger  
16 installation incentives, as noted in our tariffs. We  
17 are allocating a 2 million dollar budget for workplace  
18 charging, which will allow businesses to install EV  
19 chargers for employers, visitors -- employees,  
20 visitors, fleet vehicles, et cetera.

21           We're allocating 1 million dollars to  
22 multi-family; in other words, apartment buildings.  
23 And we're allocating 3 million dollars of incentives  
24 for businesses, agencies, et cetera to install  
25 chargers for the general public's use. For example,

1 business customers or visitors to an attraction to try  
2 to encourage around-town availability.

3           We agree to program -- program process  
4 guidelines that we can adjust as necessary over the  
5 period to make sure we are providing effective  
6 education and outreach to our customers and others  
7 regarding EV benefits and incentives. And we agreed,  
8 of course, to a lot of reporting requirements,  
9 including quarterly, annual and a final report  
10 addressing the program utilization, the system impacts  
11 we're seeing and a variety of other valuable  
12 learnings.

13           We also agreed to explore whether  
14 automated emissions reduction technology can be  
15 utilized by our customers in concert with the  
16 incentives to encourage vehicle charging at lower  
17 emission periods. And we agreed to run this program  
18 over a three-year period and if we are seeing positive  
19 results, then we're going to collaborate with Staff  
20 and OPC to see if an additional two-year period  
21 extension of the program is possible.

22           And while it's not specifically presented  
23 in this Charge Ahead case, I'd also like to draw your  
24 attention to our rate case in File Number ER-2019-0335  
25 where we presented two time of use rate structures;

1 one of which is specifically designed with EV drivers  
2 in mind to promote overnight EV charging.

3           So how do these settlement provisions  
4 match with the key observations that Staff made from  
5 the workshop? For one thing, they're encouraging  
6 flexibility. While we're putting guardrails around  
7 the incentives with regard to when a customer  
8 qualifies, the amount of the incentives and the  
9 application of the incentives -- the application of  
10 the incentives first-of-the-line extension charge, the  
11 qualifying customers can still have somewhat freedom  
12 in the utilization of the funds in a manner they see  
13 fit to offset their installation costs.

14           We are remaining technology neutral.  
15 We're not making this dependent on the adoption of a  
16 particular technology, while we are encouraging --  
17 while we are making the incentives paid on certain  
18 levels -- at certain levels of charging, we aren't --  
19 and we're giving some preference to Energy Star  
20 certified equipment, we're not limiting these  
21 incentives to any particular charging equipment  
22 manufacturer or vendor.

23           As far as data collection, with the  
24 reporting, we are obviously trying to gather as much  
25 data as we can to have a robust data collection

1 process. There might be times when equipment or  
2 software or other constructs limit what we can  
3 reasonably collect, but we believe in this program and  
4 we know that data collection analysis will be vital to  
5 any potential continuation of it. So we're taking  
6 this very seriously.

7           Customer education. As you can see in  
8 Attachment B to the settlement, the document titled  
9 Program Process, we've agreed to build in significant  
10 education and guidance opportunities for our  
11 customers. And not only that, but we're planning  
12 parallel outreach to others who can help customers who  
13 are interested in EVs, including auto dealers,  
14 electricians, building design professionals and  
15 charging station suppliers. And these incentives are  
16 providing us unique education opportunities, so we  
17 plan to take full -- make full use of that.

18           And then when -- Staff's point about  
19 pilot programs, you know, what we've proposed is a  
20 series of incentives applicable on a time-limited  
21 basis, specifically structured to present some unique  
22 learning opportunities. We think we can learn a lot  
23 about our customer interest, responsiveness to  
24 education, EV market impacts, distribution system  
25 impacts, and other information that could be vital in

1 determining whether this type of incentive structure  
2 works in the state of Missouri.

3           So with that said, I just want to  
4 reiterate, and try to allow enough time for others to  
5 also speak, we are excited about these opportunities  
6 and we're pleased that the settlement we've reached  
7 with Staff and the OPC aligned so well with the  
8 workshop discussions and the observations noted in  
9 Staff's report.

10           But the settlement also aligns well with  
11 what Ameren Missouri has stated as its overall goals  
12 for an EV program. As we noted in the workshop  
13 docket, we believe there are three key points in  
14 aiding EV adoption in the state of Missouri.

15           We need a holistic charging eco system.  
16 We think that is going to be vital for increasing EV  
17 adoption rates. We strongly believe utility  
18 incentives can be a driving force in creating and  
19 sustaining that holistic charging eco system. And  
20 customer education is vital to successful EV adoption,  
21 regardless of the charging system model used.

22           So we're excited to have crafted a  
23 settlement that meets the observations of many of the  
24 objectives by so many in the workshop. And we're  
25 excited we're able to come back to the Charge Ahead

1 docket with a settlement that incorporates more of the  
2 programs that we had initially proposed but modified  
3 in a way to garner support from a diverse group of  
4 interests.

5 Not only have we reached an agreement  
6 with Staff and OPC, but today no party has objected to  
7 the settlement and we've had filings from Renew  
8 Missouri, ChargePoint, Sierra Club and NRDC either  
9 supporting or expressing non-opposition to the  
10 settlement. So we're now asking for your approval so  
11 we can move forward with this program so we can let  
12 you know if we find this is an effective construct.

13 And with that, we have plenty of folks  
14 here available to answer any questions you might have  
15 and I'll conclude my remarks.

16 JUDGE DIPPELL: Thank you. Would there  
17 be questions at this time for Ameren, Mr. Chairman?

18 CHAIRMAN SILVEY: Thank you. Briefly.  
19 The Commission delayed adopting your initial program  
20 so that we could have this working group. And we  
21 asked that the -- that the working group consider  
22 other options, like utility-owned models or make ready  
23 tariffs.

24 And here we are back about nine months  
25 later and what you've reached settlement on is

1 virtually identical to -- in structure -- I mean the  
2 numbers are different, allocated differently, but  
3 virtually identical to what we looked at back in  
4 February. So can you explain to me why you believe  
5 this model is superior to those other two models?

6 MS. JOHNSON: I -- I think that this  
7 model is what works best for us in this circumstance.  
8 And I might defer to Tom Byrne in a moment, but I know  
9 for Ameren Missouri, this is a construct that works  
10 best.

11 I think one of the key reasons that  
12 flexibility is so important is because this may not be  
13 the model that works as well for other utilities. We  
14 feel like our service territory is built out in a way  
15 that's sufficient and that we have enough potential  
16 interest that we can spur some growth in this manner.  
17 We know that for KCPL or Empire, that might be  
18 different.

19 So I do want to be clear, we're promoting  
20 this model for us. This is what we feel strongly is  
21 going to support -- support the adoption in Missouri.  
22 But I don't know if, Tom, you had any other statements  
23 about that?

24 MR. BYRNE: I -- you know, of course the  
25 model that we proposed was one of -- one of the models

1 that was talked about in the -- in the workshop, as  
2 well as the other ones. But I think there's an  
3 advantage to the Commission in having different -- you  
4 know, this is different than what Kansas City Power &  
5 Light Company is doing. And I think there's an  
6 advantage to trying different things in different  
7 utilities to see -- to see maybe what works best.

8 And for us, we believe this works best,  
9 but -- but it's -- it's not one size fits all.

10 MS. JOHNSON: I guess I will note too in  
11 California they have several different models  
12 operating at once, and I think there is value in that  
13 to see what works best. It might be geographically  
14 specific, it might be company specific. But we view  
15 this as one aspect of an opportunity for the entire  
16 state to learn from.

17 CHAIRMAN SILVEY: Thank you.

18 JUDGE DIPPELL: Are there other  
19 Commissioner questions? Commissioner Kenney?

20 COMMISSIONER KENNEY: I have none.

21 JUDGE DIPPELL: Commissioner Hall?

22 COMMISSIONER HALL: Yeah. So you -- you  
23 would characterize this as a make ready program.  
24 Correct?

25 MS. JOHNSON: We believe it meets one of



1 the very definitions to make ready, yes.

2 COMMISSIONER HALL: Yeah. Well, I mean,  
3 and I've been a long-time advocate for that type of  
4 program so obviously I'm applauding this -- this  
5 initiative, but I am curious. You -- you both said a  
6 couple times this is the program that works best for  
7 you. Why? Why does this work better for you than  
8 utility-owned infrastructure?

9 MS. JOHNSON: I'm going to let Tom  
10 address that from a policy perspective.

11 MR. BYRNE: I think one -- one reason we  
12 believe this works best for us is we're not -- it's  
13 not in our area of expertise to operate these  
14 stations. There are companies out there, ChargePoint  
15 and others, that -- that that's their job and they're  
16 good at it.

17 And -- and our -- you know, our -- our  
18 job and our focus is on -- is on building and  
19 operating generation transmission and distribution  
20 facilities. And -- and to get into a whole different  
21 business did not seem to us to be the right use of our  
22 resources and our focus, you know. There -- there are  
23 experts who know how to do this and we should leverage  
24 that expertise.

25 COMMISSIONER HALL: Could you or one of

1 your colleagues walk me through on Sheet 164.3 the  
2 four criteria that you intend to use if you get more  
3 applications than -- than you could accept?

4 MS. JOHNSON: I will -- I'm going to let  
5 Steve Wills address this more specifically since he's  
6 the mastermind behind the tariff.

7 MR. WILLS: Is this -- is this on here?

8 JUDGE DIPPELL: Yes.

9 MR. WILLS: Thank you. Commissioner, I  
10 think the four criteria really -- and this really only  
11 comes into play if there actually becomes like a wait  
12 list that there's enough applications for the  
13 incentives that there's actually going to be  
14 constraints on who can receive them.

15 But in that event, there are certain  
16 criteria that we felt would potentially provide either  
17 greater system benefits or be more cost effective ways  
18 of deploying this. So the first is if a customer  
19 would opt for service under a time of day rate. And  
20 so hopefully the benefits of that are -- you know, are  
21 clear in that it would encourage folks to charge  
22 during off-peak times and reduce, you know, the stress  
23 that these chargers would put on the system.

24 The second is to use an Energy Star  
25 certified EVSE equipment. And so that is obviously

1 just trying to get, you know, more energy efficiency  
2 to drive -- you know, even though you're adding  
3 electric load, you're displacing gas-powered load, but  
4 you'll add less electric load and you'll improve the  
5 overall efficiency of -- of the -- kind of the  
6 transaction, so to speak.

7           Demand mitigation solutions are things  
8 like battery storage or -- or load automation software  
9 that can help -- again, similar to time of use  
10 rates -- avoid stressing the system at times of peak  
11 demand so that you can either rely on the battery  
12 storage or some sort of software that manages the  
13 level of demand during high peak demands. That's also  
14 going to lower system demand and -- and help enhance  
15 the benefits of the program.

16           And finally, the AER is Automated  
17 Emissions Reductions technology. And that's something  
18 that we've agreed to explore as a part of the program.  
19 There's a company right now that's developing a -- a  
20 solution that is designed to kind of interact with  
21 wholesale markets and understand what the marginal  
22 fuel mix is at any given time and that information can  
23 be communicated to the charger.

24           And to the extent that you're charging  
25 and you have flexibility on when you -- your vehicle

1 can accept the charge, if you don't need it  
2 immediately, it can time -- time that charging to  
3 when, for example, maybe, you know, a lower emissions  
4 fuel is on the margin.

5           So if you were -- you know, if you were  
6 to time when there was a lot of renewables on the  
7 system or if you were to time when even more efficient  
8 coal versus less efficient coal or whatever the case  
9 may be, they can kind of look at the market mix on the  
10 wholesale market, what's going on with the fuel mix  
11 and try to charge when you're reducing emissions.

12           So that would be a way of trying to  
13 optimize the emissions reductions that would result  
14 from the electrification program.

15           COMMISSIONER HALL: Those are -- those  
16 are excellent criteria. I mean, I guess what I -- if  
17 I was writing this, which I'm not, I might have just  
18 required those in the application. But your -- I  
19 guess your -- your consideration or your concern was  
20 that that might inhibit the number of applications?

21           MR. WILLS: Well, I think -- I mean,  
22 certainly to require all four because --

23           COMMISSIONER HALL: Or one of the four,  
24 two of the four.

25           MR. WILLS: Yeah. I think what we've

1 really tried to do is provide flexibility to the  
2 marketplace. Because we -- we're trying to, you know,  
3 by ha-- the incentives will only cover a portion of  
4 the cost, but other folks, private -- you know,  
5 private businesses have to make an investment decision  
6 on their own. So we were trying to give them some  
7 flexibility in how they choose to structure this.

8 I mean, just as an example, I -- you  
9 know, I think some of these might apply better to some  
10 types of businesses than to others. For some folks,  
11 the time of use rates are only going to hurt them.  
12 Because we really are going to have some businesses  
13 that are probably going to have folks charging during  
14 peak hours. As long as their rate structure supports  
15 them paying their cost fairly, that's okay. We don't  
16 want to eliminate them from the program.

17 And in each of these cases, I can imagine  
18 there being circumstances where there are businesses  
19 that that doesn't work for and yet, we still wanted  
20 them to have the flexibility if they want to invest  
21 their money and kind of match the program dollars,  
22 they can participate.

23 COMMISSIONER HALL: Yeah. That -- that  
24 makes sense. So my understanding is -- is that the  
25 incentive is largely going to go to covering line

1 extension charges that --

2 MR. WILLS: Well, to the extent that  
3 they're incurring -- I mean so every circumstance that  
4 someone comes with an application might be different,  
5 but to the extent that line extension charges are  
6 incurred, the line -- the incentive will go first to  
7 that.

8 But then it can go to other -- and as --  
9 as Ms. Johnson mentioned, make ready can have a few  
10 different meanings, but it can go towards those make  
11 ready activities on the site, whether it be trenching  
12 and boring and conduit. But it is only going to cover  
13 whatever the total project cost is up to half. So  
14 kind of the pecking order is line extension, make  
15 ready, and then the supply equipment itself.

16 COMMISSIONER HALL: And then I understand  
17 that -- that this -- this program is -- is -- is  
18 technology neutral, I guess, to use Ms. Johnson's  
19 term. And I under-- I understand that and I think I  
20 support that. But isn't there also some concern that  
21 you might have so many different types of charging  
22 stations out there, that you're not going to be able  
23 to get them to coordinate well with the overall  
24 system? I mean isn't that one danger in not mandating  
25 a certain type of technology?

1 MR. WILLS: I probably would be better  
2 served to have Mr. Justis maybe weigh on this, but  
3 I'll try and see if -- see if -- if he gives me any  
4 looks.

5 I mean I think that there's -- there's  
6 certain interfaces that are still re-- I mean it --  
7 it -- it's technology neutral in terms of any vendor,  
8 any vendor's equipment and we have a variety of  
9 different charging levels. But I think they still  
10 have to be standard interfaces that will -- that will  
11 be capable of charging, you know, most mass market EV  
12 vehicles.

13 So it's not unfettered, you know, any --  
14 anything you call an electric vehicle charger. You're  
15 going to have certain connection capabilities to  
16 interface with most cars. I guess I've pulled -- put  
17 Mr. Justis up here.

18 MR. JUSTIS: Good morning. I would just  
19 add to that that we're seeing technology development  
20 out there that will allow you to take a basic charger  
21 that doesn't have intelligence and will be able to  
22 become a smart charger. So an in-line device you can  
23 imagine that plugs right onto the end of the charger  
24 and now you've got a smart charger.

25 To -- to burden right now the program to

1 force all smart charging might be detrimental to  
2 getting adoption going of putting charging in because  
3 of the expense. It can be significantly more  
4 expensive to put the smart charging in now and the  
5 regular fees associated with keeping those connected.

6 So we think it's a smarter play to use  
7 the smart charging now where it's appropriate, allow  
8 the basic charging. And we expect it will be able to  
9 retrofit to take advantage of programs as it becomes  
10 more affordable.

11 COMMISSIONER HALL: That's reasonable.  
12 And I think my last question is do you guys have a  
13 ball park estimate for the total number of charging  
14 stations you're going to get out of this 6.6 million?

15 MR. JUSTIS: Ball park is a thousand  
16 ports.

17 COMMISSIONER HALL: Okay. Thank you.

18 MR. JUSTIS: And we'll see, hopefully.

19 COMMISSIONER HALL: Yeah. Well, I did --  
20 I did ask for stations, as Commissioner Rupp noted. I  
21 mean, that's relevant --

22 MR. JUSTIS: Some may be -- some may be  
23 single station, some may be dual ports. But really  
24 knowing how many ports, how many cars you can serve at  
25 one time is what we want to focus on, how many ports.



1 In some cases it will be better to have a dual port  
2 that's more cost effective if you're going to go with  
3 more than one, but we'll see. I mean we'll certainly  
4 be doing quarterly reporting on this and we'll see how  
5 it takes shape.

6 MR. WILLIS: And I thought I would add, I  
7 think you -- as far as the number of different  
8 locations it's going to be at, it's going to be  
9 largely dependent on the way folks engage in the  
10 program. Because you can't -- you know, an apartment  
11 complex could put in I think it's up to ten at that  
12 location.

13 So if you have a thousand out there but  
14 some apartment complexes ask for ten incentives, you  
15 know, versus if they were just asking for two or  
16 three, you're going to have more unique places but  
17 less -- less ports in any given spot. But that's  
18 largely going to be dictated by the way folks want to  
19 engage with the program.

20 MR. JUSTIS: But ball park number of  
21 applications that we expect to fulfill, 350 to 400  
22 different locations throughout the territory for a  
23 thousand ports. So some will have more than one.

24 COMMISSIONER HALL: Okay. Well, I  
25 just -- I applaud Ameren for this program. I think

1 this is really, really exciting and I look forward to  
2 watching it develop. Thank you.

3 MR. JUSTIS: Thank you.

4 MR. WILLS: Thank you.

5 JUDGE DIPPELL: Commissioner Rupp, did  
6 you have any --

7 COMMISSIONER RUPP: He answered it.

8 JUDGE DIPPELL: Commissioner Coleman?

9 COMMISSIONER COLEMAN: No, thank you.

10 JUDGE DIPPELL: Mr. Chairman.

11 CHAIRMAN SILVEY: Thank you. Just a  
12 quick follow-up. I think probably you might be suited  
13 to answer this better. But what type of data are you  
14 going to be tracking to show that it has actually  
15 increased adoption of EVs? Obviously you'll know how  
16 many ports are out there, but --

17 MR. WILLS: So --

18 CHAIRMAN SILVEY: -- how will we know  
19 more -- more people are actually driving EVs?

20 MR. WILLS: I left -- I left my paper  
21 back there, but -- so we are tracking registrations in  
22 the territory. So we're going to know both baseline  
23 before the program started and as it goes on how many  
24 vehicle registrations are within our territory of  
25 different types, including plug-in electric and -- and

1 pure electric vehicles. So that's probably the  
2 biggest piece is just tracking the registrations.

3 Obviously, you know, we'll want to do  
4 some maybe comparisons to other regions to see if our  
5 adoption accelerates relative to those, but we'll  
6 see -- we'll see the proliferation of EVs in that  
7 registration data.

8 CHAIRMAN SILVEY: Okay. Thank you.

9 JUDGE DIPPELL: All right. Okay. I  
10 apologize that we -- we ran a little longer. I  
11 actually thought we might wrap this up before agenda,  
12 but doesn't look like we're going to be able to do  
13 that. So what we're going to do then is take a recess  
14 and allow the Commissioners to have their agenda and  
15 we will reconvene let's say 10 minutes after agenda  
16 ends. Is that --

17 (Discussion held out of the hearing of  
18 the court reporter.)

19 JUDGE DIPPELL: Okay. We've had a  
20 reconsideration and the Commissioners have graciously  
21 decided that they will push agenda back and let us  
22 continue. So I guess for those listening in, the  
23 agenda will convene some time shortly after we finish  
24 up here.

25 Okay then. Thank you, Ameren. We can

1 continue. Let's go ahead and ask Staff if you have  
2 some remarks to make about the tariffs and  
3 stipulation?

4 MS. MERS: Again, Nicole Mers for Staff.  
5 I also have with me Natelle Dietrich, Sarah Lange,  
6 Robin Kliethermes, and Byron Murray if you have more  
7 technical questions. But just real briefly at a high  
8 level, we did oppose the -- the last iteration of  
9 this, but the improvements that we've seen that made  
10 us comfortable to sign on, I'll quickly go over.

11 This stipulation, it limits and clarifies  
12 what equipment and site improvements are eligible for  
13 rebates, so there's a lot more transparency and  
14 parameters around the program. It limits and  
15 clarifies how the money is spent. And to Staff, we  
16 think it prioritizes public charging in a way that the  
17 previous program did not.

18 And we think that there are more  
19 protections against free ridership in the  
20 concentration of a rebate being in a single location  
21 or entity. We think that this recognizes the  
22 infrastructure costs to the distribution system, so  
23 the increase in demand. Limits total unseen spending  
24 through the construction allowance portion. It kind  
25 of limits that to 2 million. That's in paragraph 7 of

1 the stip. It also prioritizes participation to  
2 customers that are willing to limit the demand and  
3 input in mitigation measures.

4 We also thought that the data is -- is  
5 very important. It's an extensive part of the  
6 stipulation and we think that that will be very  
7 helpful to evaluate the program going forward and to  
8 evaluate this model versus, you know, the other models  
9 that we -- we discussed in the report.

10 We also are going to be receiving bill  
11 impact and cha-- charging cost information. That's  
12 discussed in paragraph 4 of the stipulation. And then  
13 also a big thing for us was the business solutions  
14 program was strapped and we had a problem with that,  
15 but without that, we were able to sign on and go  
16 forward.

17 So if you have any questions, I can try  
18 to answer them.

19 JUDGE DIPPELL: Mr. Chairman, did you  
20 have questions for Staff?

21 CHAIRMAN SILVEY: So were none of the  
22 things that you just mentioned in the previous  
23 proposal back in February?

24 MS. MERS: We didn't think -- Staff  
25 didn't believe that the parameters around the proposal

1 back in February were as strictly defined or as  
2 clearly laid out, but we see more of that in the  
3 tariff. And there's a lot more transparency and I  
4 think strictness that -- that Staff was able to feel  
5 more comfortable with this iteration.

6 CHAIRMAN SILVEY: So you specifically  
7 asked for the working group; Staff did.

8 MS. MERS: Uh-huh.

9 CHAIRMAN SILVEY: And prior to that, you  
10 were advocating for a make ready tariff with separate  
11 meters. And here we are back with pretty much the  
12 same thing that we saw in February with those few  
13 exceptions that you just mentioned. So is this what  
14 you had envisioned? Is that the type of make ready  
15 tariff that -- that you were wanting before?

16 MS. MERS: I think this is closer to the  
17 make ready tariff Staff had envisioned. But I might  
18 defer that to Robin Kliethermes and Sarah Lange to  
19 explain what Staff envisions as a make ready.

20 But as Ameren said, and I'll echo this, I  
21 do think one of the constant things that -- that we've  
22 heard and taken into consideration and our position  
23 going forward was from other stakeholders in that  
24 working group process, that perhaps one model might  
25 not be the solution and that we might not have enough

1 data at this point to evaluate. So what works for one  
2 utility may not work for all of them, so although  
3 there might be differences in how we would define a  
4 make ready program, trying to evaluate how this  
5 program works, I think there's value to that.

6 CHAIRMAN SILVEY: Well, I'll be honest.  
7 You know, what was proposed back in February is  
8 something I probably could have supported. And I know  
9 at least one Commissioner publicly stated on the day  
10 that we set up the working group that they would vote  
11 for that that day.

12 MS. MERS: Uh-huh.

13 CHAIRMAN SILVEY: In setting up the  
14 working group, I made it clear that I didn't want to  
15 see just a needless delay. And here we are nine  
16 months later with essentially what we could have  
17 passed back in February with a few tweaks and I feel  
18 like we may have done a needless delay.

19 So I'm not real thrilled with -- with the  
20 way that this has played out. I am happy with the  
21 program, but I think that we probably should have done  
22 it back in February in retrospect. So thank you.

23 JUDGE DIPPELL: Did you want to hear from  
24 either Ms. Kliethermes or Ms. Lange?

25 CHAIRMAN SILVEY: Yeah.

1 MS. LANGE: Chairman, I will politely  
2 rephrase my counsel's answer to your question and say  
3 this is significantly different than what was proposed  
4 in February. Each of those elements listed were not  
5 in the initial application. They are important  
6 elements Staff views to allowing flexibility, but  
7 mitigating free ridership, giving the tools for people  
8 who are interested in developing charging stations to  
9 move forward, but not allowing those who would have  
10 moved forward anyway to just receive utility funds  
11 cart blanche.

12 CHAIRMAN SILVEY: Okay. Thank you.

13 JUDGE DIPPELL: Did you -- does somebody  
14 else have -- Ms. Lange, just one moment. I think  
15 Commissioner Hall had --

16 COMMISSIONER HALL: Well, I don't know if  
17 this is to you or -- but you say that this mitigates  
18 free ridership compared to the earlier program. If  
19 you could just elaborate on that.

20 MS. LANGE: Sure. If I could direct you  
21 to the tariff -- there's -- this is done in a number  
22 of places, but the clearest place to see it is if you  
23 look at Sheet 164.1. Site development costs are very  
24 clearly defined and excludes the sort of situation  
25 where let's say I was going to build a convenience



1 store and add some electric charging station. Under  
2 the fluidity of the proposed Ameren tariff, I could  
3 have included my curb cuts, I could have included the  
4 normal costs of developing a convenience store in  
5 that.

6 This strictly limits it to, if you will,  
7 the but for costs of installing the charging  
8 infrastructure. That -- that's the cleanest way to  
9 see it. To -- you know, to get deeper into the weeds  
10 if you'd like, also the limitation on the number -- if  
11 you look at Sheet 164.2, that quantity table, that to  
12 us is a big improvement in making sure that this  
13 doesn't just all go to -- to one concentrated entity  
14 that may have been looking at fully electrifying their  
15 fleet anyway. This makes sure that the program  
16 rebates are spread around.

17 COMMISSIONER HALL: Okay. Thank you.

18 JUDGE DIPPELL: Any other Commission  
19 questions for Staff? Commissioner Rupp? Commissioner  
20 Coleman?

21 COMMISSIONER COLEMAN: No, thank you.

22 JUDGE DIPPELL: All right. Thank you.

23 And Public Counsel, would you like to  
24 make some remarks?

25 MR. POSTON: Yes. Thank you. We clearly

1 support the stipulation. We echo the comments that  
2 Staff made. We think this -- in particular, the data  
3 gathering, we think that will be very helpful, the  
4 customer education component, and the fact that this  
5 will not harm competition among the charging station  
6 market.

7                   With me today is Geoff Marke. He was  
8 instrumental in working on this stipulation and would  
9 be happy to answer any questions you have.

10                   JUDGE DIPPELL: Mr. Chairman, did you  
11 have questions for Public Counsel?

12                   CHAIRMAN SILVEY: Yeah. Did -- did the  
13 working group have any impact on OPC's position  
14 changing to be now supportive, or is it just the  
15 allocation of the numbers differently and some of  
16 those other things that have been added?

17                   MR. POSTON: If I could kick that to --  
18 to -- to Geoff, he was in the working groups so he  
19 could help answer that.

20                   MR. MARKE: I would -- Chairman, I would  
21 say that the negotiations with the Company and with  
22 Staff probably had more of an impact on the final  
23 outcome here. I think the working group reinforced a  
24 lot of our original positions.

25                   CHAIRMAN SILVEY: So it was more just

1 having more time to work on it than -- than actually  
2 what came out of the working group?

3 MR. MARKE: Our initial position in the  
4 last EV docket, we were actually in support of it.  
5 We -- we had argued that the Company should have skin  
6 in the game and we had said that recovery -- cost  
7 recovery should be tied to actual EV adoption.

8 As a result of settlement and largely  
9 with a lot of stuff that Staff's already articulated,  
10 as well as an opportunity to go ahead and gather more  
11 information -- it's already been alluded to by Ameren,  
12 but the automated emission reductions we think would  
13 be something that we're having interested in seeing  
14 how it's going to play out and its applicability to  
15 other programs.

16 And the fact that the program is confined  
17 to a certain dollar amount and a certain temporal  
18 period at this point before we make a decision one way  
19 or the other. For all of those reasons, that's why we  
20 were comfortable signing on.

21 CHAIRMAN SILVEY: Thank you.

22 JUDGE DIPPELL: Is there any questions  
23 for Public Counsel?

24 COMMISSIONER KENNEY: No, thank you.

25 JUDGE DIPPELL: Commissioner Hall?

1                   COMMISSIONER HALL: Yeah. I have one  
2 question. And that is on page 3 of the stipulation  
3 near the bottom where it says that the signatories  
4 further agree any investments related to EV charging  
5 stations installations are associated with new revenue  
6 and so do not meet the definition of qualifying plant  
7 under Section 393.1400. What is the significance of  
8 that?

9                   MR. BYRNE: I can answer that if you  
10 want.

11                   MR. POSTON: Yeah. Perhaps another party  
12 can answer that.

13                   MR. BYRNE: Do you want -- want me to  
14 try?

15                   COMMISSIONER HALL: Sure.

16                   MR. BYRNE: I mean, it basically means we  
17 can't get PISA treatment for these -- for these  
18 facilities.

19                   COMMISSIONER HALL: Okay. Thank you.

20                   JUDGE DIPPELL: Are there any other  
21 questions for Public Counsel? All right. Thank you  
22 very much.

23                   Would Renew Missouri like to make some  
24 comments? Mr. Opitz?

25                   MR. OPITZ: We support the Company's

1 efforts in this area and ask the Commission to approve  
2 the stipulation.

3 JUDGE DIPPELL: Okay. Any Commission  
4 questions for Renew?

5 Would Sierra Club or National Resources  
6 Defense Council like to make any statements?

7 Mr. Robertson?

8 MR. ROBERTSON: Well, we supported the  
9 original application and we were not privy to the  
10 negotiations of the stipulation, but we filed a  
11 statement in support and so we ask the Commission to  
12 approve.

13 JUDGE DIPPELL: All right. Thank you.  
14 Would there be any Commission questions for -- no.

15 Is there any remarks from Empire?

16 MS. CARTER: No. Thank you.

17 JUDGE DIPPELL: Anything from Division of  
18 Energy?

19 MS. BLIGH: Division of Energy does not  
20 oppose the application and has no comments.

21 JUDGE DIPPELL: Okay. Is there anything  
22 from MIEC, Mr. Mills?

23 MR. MILLER: Judge, the MIEC has no  
24 objection to the Stipulation and Agreement and I've  
25 got nothing further to add at this time.

1 JUDGE DIPPELL: All right. Are there any  
2 other Commission questions for any of the parties?  
3 Okay. Seeing none, any -- did I miss any remarks from  
4 anyone? Seeing none, then I believe that concludes  
5 this presentation and thank you all for your  
6 attendance and your -- your information. We can go  
7 off the record.

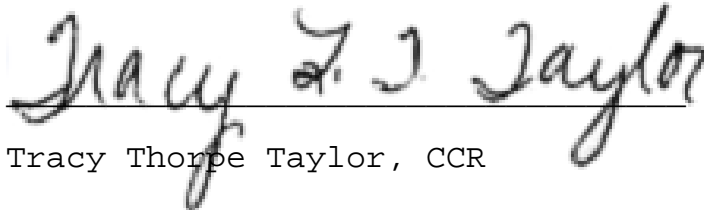
8 (WHEREUPON, the On-The-Record  
9 Presentation was adjourned.)

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CERTIFICATE OF REPORTER

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Tracy Thorpe Taylor, CCR

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