

to meet with Ameren Missouri until May 3, from 8 to 9 a.m. Unfortunately, the May 3 phone conference was unproductive and ended about 20 minutes after it started. During the phone conference, Ameren Missouri gave Staff an opportunity to ask questions and specifically asked Staff to discuss its concerns with the tariff filing so that Ameren Missouri could better understand Staff's concerns and try to address them on the call. Staff stated it had nothing else to say other than what had already been provided in the Staff recommendation. Ameren Missouri found this surprising as Staff criticized the lack of opportunity for discussion and discovery in its recommendation:

Staff did not have time for discussion on the single day Ameren Missouri afforded for discussion prior to its tariff filing. Staff did not anticipate that Ameren Missouri would fail to provide any further explanation of the need for Ameren Missouri's requested extension. The interval permitted to Staff for this memorandum does not allow time for any data requests.

Staff Memorandum, p. 2. While Staff criticized Ameren Missouri, Staff has not been willing to engage in substantive discussions itself. Over the last six (6) weeks since the filing of the proposed tariff sheets on March 28, Staff has not asked any data requests formally, or asked for further information informally, other than requesting to see the final report that is not due until the end of the initial program period after May 30. Ameren Missouri prepared a draft final report with information through April 1, and has provided the draft to Staff for review.

5. Ameren Missouri will address Staff's concerns, as it understands them, as part of this response, as well as addressing why it is requesting additional time for the Program. The Commission's *Order* allows Staff to respond to Ameren Missouri's response no later than May 16. Ameren Missouri requests the opportunity to respond further by no later than May 20 to any additional concerns Staff raises in its response that could have been shared with Ameren Missouri in discussions.

Purpose of Charge Ahead-Business Solutions Program

6. The Program fits into the larger picture of Ameren Missouri's Sustainability Value Proposition. The Program encourages business customers to adopt efficient electrification measures that provide economic, health, and performance benefits to them, environmental benefits to all, and increased overall customer affordability through positive benefit/cost ratios. Specific measures include the electrification of high capacity lift trucks and electric truck refrigeration unit ports. Electric alternatives that replace higher-emitting fossil-fueled technologies assist Ameren Missouri and our customers in increasing operational efficiencies and reducing overall energy consumption and emissions. Further, the Program is a pilot with a small and limited scope to learn more about the market for these technologies and the benefits of them perceived by customers. At the same time, the pilot should provide additional information about how these technologies are used in the context of Ameren Missouri's system. This should help inform expectations regarding the extent to which these types of loads will impact future peak loads and capacity investments while the Program is at a scale that is not expected to significantly impact the system.

No Additional Budget is Requested

7. Important for the Commission's decision is the fact that Ameren Missouri is not requesting a change to the budget of the Program. The Program budget shall not exceed the \$1.9 million approved in the Stipulation, with at least \$1.52 million available for incentives under the Program, and the remainder of Program funding being available for administrative and educational activities.

Program Extension Will Optimize Recent Partner Relationships

8. The electric truck refrigeration unit (e-TRU) program has been slow to start due to the challenge of finding program partners in the Midwest. E-TRUs are a relatively new technology

that has not yet garnered wide support in the Midwest. Distributors that were potential program partners to help promote e-TRUs have only recently begun to be interested in promoting the technology. Ameren Missouri has been able only in the last 6 months to secure a distributor partner and a corresponding manufacturer to help develop the market. Semi-trailers have a 5-6 year lifespan and the electric hookups are only recently being added to trailers in the Midwest. Now is the time to begin promoting the e-TRUs in the market so that customers can reap the benefits of the economic, health, and performance benefits to them.

9. On the high capacity lift truck (HCLT) side of the program, Ameren Missouri has had partners since the start of the program from previous efforts in the regular capacity lift truck market. Ameren Missouri purchased and received a HCLT for demonstration purposes at the end of 2022. During 2023, the HCLT was demonstrated at 15 customer sites and has received rave reviews. At least 3 customers have converted or are in the process of converting to electric HCLT. Lifecycles for HCLT and leases can be 5-7 years and some customers are waiting until their lease ends to convert. The HCLT has already completed or is scheduled for at least 10 more demos in 2024. This number will grow throughout the year.

10. If the program is not extended, Ameren Missouri will have interested customers on the HCLT side that may make other decisions regarding their HCLT purchase since the electric version is a premium upfront cost to other fuels. In the e-TRU market, Ameren Missouri is just beginning to get program momentum, and without extending the Program term will not be able to excite the market to understand and take advantage of the economic, health, and performance benefits of having e-TRUs powering refrigerated trailers while at customer facilities.

11. Preventing a long lapse in the Program is crucial as certainty is needed for customers to invest in the technology. Currently the tariff sheets expire May 30, and the continued

suspension of the tariff sheets would not allow the Program back into service until July 27. This lapse in ability to offer incentives could cause customers to make decisions contrary to the benefits of the Program. Expedited treatment of the tariff sheets is necessary to prevent a lapse in incentives.

Other Staff Concerns

12. In Staff's Memorandum, Staff states that "[e]xtension of this load building program is contrary to Ameren Missouri's pending MEEIA Application in EO-2023-0136, and is inconsistent with energy and capacity needs Ameren Missouri has asserted across dockets." Staff alleges the goal of the Program is to increase sales of energy. Staff misconstrues Ameren Missouri's testimony in order to support Staff's incorrect assumption. It is true that customers that invest in electrification of HCLTs and e-TRU unit ports will see an increase in usage on their electric bill, all else remaining equal. However, load building is not the "goal" of this Program as Staff asserts. The "goal" or purpose of the Program is explicitly set out in the tariff sheets that Staff recommended approval of on May 5, 2021, in this case:

PURPOSE

The Charge-Ahead – Business Solutions program (the Program) encourages business customers to adopt efficient electrification measures that provide economic, health, and performance benefits to them, environmental benefits to all, and increased overall customer affordability through positive benefit/cost ratios.

13. Further, if Ameren Missouri paid out all of the incentive dollars available over the next 2 years split evenly between HCLT and e-TRUs, it would increase Ameren Missouri's MWh load by 16,103 MWhs. This would be the equivalent of adding 1,314 homes to Ameren Missouri's system or an overall increase of only .052% of total load.

WHEREFORE, Ameren Missouri requests the Commission approve the extension of the Charge-Ahead – Business Solutions Program through May 31, 2026, and direct Ameren Missouri to file compliance tariff sheets for approval on an expedited basis.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to the parties of record on
this 13th day of May 2024.

/s/ Jennifer L. Hernandez

