

regarding the Pilot. Staff repeatedly took that opportunity, asking multiple questions of Ameren, and receiving relevant information regarding the Pilot.

4. During the meeting, Staff followed up on concerns from its recommendation, including whether there were any customers “in the pipeline,” estimated completion dates for those customers, and evidence that those customers would not proceed with equipment acquisition but-for the Program incentives.²

5. In response to Staff’s questions and concerns, Ameren responded that (1) there are no customers “in the pipeline” for the Electric Truck Refrigeration (ETRU) pilot, and (2) no additional customers for the ETRU pilot are expected for approximately 2 years, and (3) there are no customers with immediate interest in the Lift Truck portion of the Pilot. If there were Lift Truck customers with immediate interest, that would be served by a limited extension of the Pilot, with reasonable conditions to protect the opportunity for participation of such customers.

6. Ameren also did not address Staff’s concerns regarding a Pilot extension being inconsistent with Ameren Missouri’s pending MEEIA application during the Meeting.³ Staff did not specifically inquire as to this point, because the relevant data would be a review of customer usage characteristics, which is to be provided in the final report for the Pilot. However, with no customers participating in the ETRU pilot, Staff understands that customer usage characteristic data is not available.

7. Staff appreciates Ameren providing a draft copy of the final report for review, which is required to be completed at the end of the initial Pilot period, which in this case is

² *Staff Recommendation*, Appendix A, pg. 5.

³ See Case No. EO-2023-0136.

May 30, 2024. However, the draft final report does not include information regarding how customers are using energy, coincident demand, or off-peak usage – the customer usage characteristics which would be necessary to understand if the Pilot is improving system utilization relative to demand for energy at times which could necessitate additional investments or increase net revenue requirement. In effect, the draft final report focuses more on how the Pilot has been advertised, with no substantive information regarding the Pilot's impact.

8. And though Ameren notes that Staff did not follow up with any data requests or informal requests for information, that is because it was clear from the Meeting that Ameren did not have information sufficient to support an extension of the Pilot, and the only information which may be relevant was to be provided in the final report.

9. With no customers currently in the pipeline, and no additional customers reasonably expected for at least one more year, if not more, it is unreasonable for the Pilot to be extended for two more years. Rather than wrapping up the Pilot, Ameren is requesting an extension to **begin** the Pilot, despite the Pilot having been approved in 2021.

10. Staff will address the substance of Ameren's Response in testimony as appropriate if the Commission does not dismiss this matter, with the exception of noting that the health-related benefits of the Pilot noted in Ameren's Response are inconsistent with the presentation of facts made by Ameren during the Meeting. During the Meeting, Ameren noted that the few lift trucks to date incentivized by the program were replacement for propane or natural gas units, which is inconsistent with the Pilot design, which contemplated that the electric lift trucks would primarily replace diesel units.

11. Staff stands on its recommendation that the Commission reject the tariff sheets filed by Ameren on March 28, 2024.

WHEREFORE, Staff respectfully submits its *Staff Response to Ameren's Response to Staff's Recommendation* for the Commission's consideration, and continues to recommend that the Commission reject the following proposed tariff sheets Ameren filed on March 28, 2024:

P.S.C. MO. No. 6

1st Revised Sheet No. 164.4 Canceling Original Sheet No. 164.4

2nd Revised Sheet No. 164.5 Canceling 1st Revised Sheet No. 164.5

Respectfully submitted,

/s/ Travis J. Pringle

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CERTIFICATE OF SERVICE

I certify that copies of the foregoing have been electronically mailed to all parties and/or counsel of record on this 16th day of May, 2024.

/s/ Travis J. Pringle