

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

In the Matter of the Application of Union )  
Electric Company d/b/a Ameren Missouri for ) **File No. ET-2021-0020**  
Approval of Efficient Electrification Program ) Tracking No. JE-2024-0131

**AMEREN MISSOURI'S FURTHER RESPONSE TO STAFF'S RESPONSE**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), and for its *Further Response to Staff's Response* respectfully states to the Missouri Public Service Commission ("Commission") as follows:

1. Ameren Missouri understands that further responses are not usually requested by the Commission. However, Ameren Missouri believes a few misstatements in the *Staff Response To Ameren's Response to Staff's Recommendation* ("Staff Response") should not go without correction. Perhaps misunderstandings could have been avoided had Staff been willing to discuss its concerns with the tariff sheet filing with Ameren Missouri on the May 3, 2024 phone conference. And while Ameren Missouri appreciates Staff's acknowledgement of Ameren Missouri's preparation for the phone conference, the Staff Response did not address why Staff was unwilling to engage in discussions with Ameren Missouri and share Staff's concerns with the tariff sheet filing. Staff's Response at paragraph 6 states that Ameren Missouri did not address certain Staff concerns regarding the pilot extension in its Response to Staff Recommendation. While Ameren Missouri believes its Response to Staff Recommendation addressed Staff's concern as stated in paragraph 6, certainly one can understand the difficulties in responding to concerns when the party with the concerns will not engage in discussions to elaborate exactly what those concerns are.

#### Staff Response Paragraph 5

2. In response to Staff's response, Ameren Missouri has completed or scheduled 25 demonstrations of the High Capacity Lift Truck (HCLT) with a lot of interest from customers. The sales cycle for lift trucks can be long. And while Ameren Missouri does not currently have any applications in hand, it reasonably expects some of those demonstration customers to convert to electric within a two-year extension of the program. Ameren also expects conversion on the e-TRU product this year, not two years as Staff stated. The market is just now getting started in the Midwest due to the lifecycle of refrigerated trailers. Extending the incentives will excite that market and allow Ameren Missouri to learn more about the usage habits for e-TRUs. Ameren Missouri's partners on the e-TRU product are eager to work with Ameren Missouri to learn more about this market. The manufacturer is supplying a demo case for Ameren Missouri's use to show customers what the product looks like and how it operates.

#### Staff Response Paragraph 6

3. The off-road incentive program is not a load building program. It is aimed at understanding the market and the charging and usage of customers utilizing HCLT and e-TRUs. If Ameren were to pay out all of the incentive money over the two-year extension, the load is still very small compared to overall retail sales.

#### Staff Response Paragraph 9

4. Staff is correct and Ameren Missouri agrees that Ameren Missouri is just now starting the program on the e-TRU product. Ameren Missouri was ahead of the market and was not able to enlist the support of any partners in the Midwest until the end of 2023. Ameren Missouri is now training a Business Development Manager on the e-TRU to understand the product and its installation and work with the distributor to promote e-TRU. This is why it is essential to extend

the program for two years to allow Ameren to learn about the e-TRU product and its usage patterns. Staff cannot complain about not having usage data if it will not allow Ameren Missouri a reasonable opportunity to gather any available data. Further, Ameren Missouri has a reasonable belief that there will be HCLT conversions within the two years if the program is extended.

Staff Response Paragraph 10

5. Staff is incorrect in stating that Ameren Missouri has incentivized conversions from propane or natural gas HCLT units to electric. To date, Ameren Missouri has only incentivized conversion of two HCLT units from diesel to electric. There have been customers that were utilizing propane HCLT units that have converted to electric, but they were not incentivized by Ameren Missouri. Ameren Missouri will continue to demonstrate the HCLT to any customers interested in the electric HCLT, but will only incentivize customers that are converting from diesel fuel to electric.

Ameren Missouri's Recommendation

6. Ameren Missouri recommends the Commission forego scheduling the filing of testimony as Staff has alluded to in its Staff Response. Ameren Missouri believes the Commission has enough information before it to approve a simple change of the end date for the Charge-Ahead – Business Solutions Program for a period of two years, through May 31, 2026. Ameren Missouri is seeking no other changes to the Program. That includes no changes to the previously approved \$1.9 million budget of the Program. Ameren Missouri would use the funds that remain available from the \$1.9 million budget to run the Program over the extended two-year period.

**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,

**/s/ Jennifer L. Hernandez**

Jennifer L. Hernandez, MO Bar #59814

Corporate Counsel

1901 Chouteau Avenue, MC 1310

P.O. Box 66149

St. Louis, MO 63166-6149

(314) 978-8418 (Telephone)

(314) 554-4014 (Facsimile)

[AmerenMOService@ameren.com](mailto:AmerenMOService@ameren.com)

**ATTORNEY FOR UNION ELECTRIC  
COMPANY d/b/a AMEREN MISSOURI**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been emailed to the parties of record on this 20<sup>th</sup> day of May 2024.

**/s/ Jennifer L. Hernandez**