



technologies assist Ameren Missouri and our customers in increasing operational efficiencies and reducing overall energy consumption and emissions.<sup>6</sup>

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.<sup>7</sup> At the same time, the pilot should provide additional information about how these technologies are used in the context of Ameren Missouri's system.<sup>8</sup> 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.<sup>9</sup>

### **No Additional Budget is Requested**

Important for the Commission's decision is the fact that Ameren Missouri is not requesting a change to the budget of the Program.<sup>10</sup> 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.<sup>11</sup>

### **Program Extension Will Optimize Recent Partner Relationships**

The e-TRU side of the Program has been slow to start due to the challenge of finding Program partners in the Midwest.<sup>12</sup> E-TRUs are a relatively new technology that has not yet garnered wide support in the Midwest.<sup>13</sup> Distributors that were potential Program partners to help promote e-TRUs have only recently begun to be interested in promoting the technology.<sup>14</sup> Ameren

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<sup>6</sup> Ex. 2, p. 3.

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

<sup>12</sup> *Id.*

<sup>13</sup> Ex. 2, pp. 3-4.

<sup>14</sup> Ex. 2, p. 4.

Missouri has been able only in the last 6 months to secure a distributor partner and a corresponding manufacturer to help develop the market.<sup>15</sup> Semi-trailers have a 5-6 year lifespan and the electric hookups are only recently being added to trailers in the Midwest.<sup>16</sup> 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.<sup>17</sup>

On the 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.<sup>18</sup> Ameren Missouri purchased and received a HCLT for demonstration purposes at the end of 2022.<sup>19</sup> During 2023, the HCLT was demonstrated at 15 customer sites and has received rave reviews.<sup>20</sup> At least 3 customers have converted or are in the process of converting to electric HCLT.<sup>21</sup> Lifecycles for HCLT and leases can be 5-7 years and some customers are waiting until their lease ends to convert.<sup>22</sup> The HCLT has already completed or is scheduled for at least 10 more demos in 2024.<sup>23</sup> This number will grow throughout the year.<sup>24</sup>

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.<sup>25</sup> In the e-TRU market, Ameren Missouri is just beginning to get Program momentum.<sup>26</sup> Without extension of the Program term, Ameren Missouri

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<sup>15</sup> Ex. 2, p. 4.

<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

<sup>18</sup> *Id.*

<sup>19</sup> *Id.*

<sup>20</sup> *Id.*

<sup>21</sup> *Id.*

<sup>22</sup> *Id.*

<sup>23</sup> *Id.*

<sup>24</sup> *Id.*

<sup>25</sup> *Id.*

<sup>26</sup> *Id.*

will not be able to excite the market to understand and take advantage of the economic, health, and performance benefits for customers of having e-TRUs powering refrigerated trailers while at customer facilities.<sup>27</sup>

Preventing a long lapse in the Program is crucial as certainty is needed for customers to invest in the technology.<sup>28</sup> Currently, the tariff sheets expired May 30, 2024, and the continued suspension of the proposed tariff sheets will not allow the Program back into service until July 27, 2024.<sup>29</sup> Continued lapse in the ability to offer incentives could cause customers to make decisions contrary to the benefits of the Program.<sup>30</sup> Should the Commission grant an extension of the Program, expedited treatment of the tariff sheets is necessary to prevent a larger gap in both the Program and customer access to incentives.<sup>31</sup>

**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**

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<sup>27</sup> Ex. 2, p. 4.

<sup>28</sup> *Id.*

<sup>29</sup> Ex. 2, pp. 4-5.

<sup>30</sup> Ex. 2, p. 5.

<sup>31</sup> *Id.*

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been emailed to the parties of record on this 28<sup>th</sup> day of June 2024.

**/s/ Jennifer L. Hernandez**