Exhibit No:	
Issue:	Electric Vehicle Charging Rate
Witness:	Eric Austin
Type of Exhibit:	Direct Testimony
Sponsoring Party:	MECG
File No:	ER-2024-0319
Date Testimony Prepared:	December 17, 2024

MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. ER-2024-0319

DIRECT TESTIMONY AND EXHIBITS OF

ERIC S. AUSTIN

ON BEHALF OF

MIDWEST ENERGY CONSUMERS GROUP

DECEMBER 17, 2024

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a/ Ameren Missouri's Tariffs to Adjust its Revenues for Electric Service	)))	File No. ER-2024-0319

AFFIDAVIT OF ERIC S. AUSTIN

STATE OF ARKANSAS)
)
COUNTY OF BENTON)

COMES NOW Eric S. Austin and on his oath declares that he is of sound mind and lawful age; that he prepared the attached direct Testimony; and that the same is true and correct according to his best knowledge and belief, under penalty of perjury.

Further the Affiant sayeth not.

Eric S. Austin

TABLE OF CONTENTS

Exhibits

I. Introduction

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.

A. My name is Eric S. Austin, my business address is 2608 SE J Street, Bentonville, AR 72716-0550. I am employed by Walmart Inc. ("Walmart") as Sr. Manager, Utility Partnerships – Regulatory.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS DOCKET?

A. I am testifying on behalf of Midwest Energy Consumers Group ("MECG"), which is an incorporated association representing the interests of large commercial and industrial users of electricity. MECG members take electric service from Union Electric Company d/b/a Ameren Missouri ("Ameren" or "the Company") primarily on Service Classification No. 3(M) Large General Service Rate ("LGS"), Service Classification No. 12 4(M) Small Primary Service Rate ("SP"), and Service Classification No. 11(M) Large Primary Service Rate ("LP").

Q. PLEASE DESCRIBE YOUR EDUCATION AND EXPERIENCE.

A. In 2009, I earned a Bachelor of Science degree in Education from Texas A&M University – Commerce, and I am currently earning a Masters of Legal Studies from Texas A&M University. I have over twelve years of experience in the utility industry, including both investor-owned utilities and cooperatives. I was involved in several areas of the utility business, including generation, transmission, distribution, demand response, and electric vehicle charging. Most recently before Walmart, I was the Manager of Electric Transportation and Public Charging at

American Electric Power ("AEP"). I joined Walmart in 2023 as a Senior Manager, Utility Partnerships. My Witness Qualifications Statement is attached as Exhibit ESA-1.

Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION ("COMMISSION")?

A. No, I have not.

Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER STATE REGULATORY COMMISSIONS OR LEGISLATURES?

A. Yes; I have submitted testimony with the New Mexico state legislature and served as an expert witness in Kansas and New Mexico on matters relating to Electric Vehicle Charging Infrastructure and Geothermal Heat Pumps. I have also submitted testimony in New Hampshire, New Mexico, Louisiana, Washington, Oklahoma, Oregon, Indiana, Texas and Nevada.

Q. ARE YOU SPONSORING EXHIBITS IN YOUR TESTIMONY?

A. Yes. I am sponsoring the exhibits listed in the Table of Contents.

Q. DO MECG'S MEMBERS HAVE A SIGNIFICANT IMPACT ON MISSOURI'S ECONOMY?

A. Yes. For example, as shown on Walmart's website, Walmart operates 156 retail units and four distribution centers and employs over 48,500 associates in Missouri. In fiscal year ending 2024, Walmart purchased $9.3 billion worth of goods and services from Missouri-based suppliers, supporting over 70,000 supplier jobs.[1]

[1] https://corporate.walmart.com/about/location-facts/united-states/missouri

II. Purpose of Testimony and Summary of Recommendations

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to provide MECG's request for an electric vehicle ("EV") charging rate.

Q. PLEASE SUMMARIZE MECG'S RECOMMENDATIONS TO THE COMMISSION.

A. MECG's recommendations to the Commission are as follows:

> For the purposes of this docket, the Commission should require Ameren to create alternative optional LGS ("LGS-EV") and SP ("SP-EV") rates for EV charging customers with load sizes that would qualify to take service on LGS or SP rates.

Q. DOES THE FACT THAT YOU MAY NOT ADDRESS AN ISSUE OR POSITION ADVOCATED BY THE COMPANY INDICATE MECG'S SUPPORT?

A. No. The fact that an issue is not addressed herein or in related filings should not be construed as an endorsement of, agreement with, or consent to any filed position.

III. Development of Optional EV Charging Rates

Q. PLEASE PROVIDE A BRIEF OVERVIEW OF MECG'S EV CHARGING RATE REQUEST.

A. For the purposes of this docket, MECG is requesting that the Commission require Ameren to create alternative optional LGS ("LGS-EV") and SP ("SP-EV") rates

for EV charging customers with load sizes that would qualify to take service on LGS or SP rates. These alternatives could then serve as a basis from which the Company and stakeholders can design durable EV charging rate schedules in the rate redesign process.

Q. WHY DOES MECG PROPOSE TO MAKE THESE OPTIONAL RATES?

A. MECG proposes LGS-EV and SP-EV as optional rates because how EV charging is used will drive the resulting monthly usages and load factor used for billing. For example, public EV charging use can be unpredictable, start low and grow over time, which would benefit from the EV rate option. Whereas managed charging applications may plan for higher monthly usage amounts relative to peak demand and result in load factors better suited for traditional commercial and industrial rates.

Q. WAS THIS REQUEST DISCUSSED IN THE COMPANY'S PRIOR GENERAL RATE CASE?

A. Yes, however the speed and progress of a new rate has fallen short of expectations and the need for prompt development and deployment of an EV charging rate is urgent.

Q. PLEASE EXPLAIN

A. EV charging for public use as well as fleet and last mile delivery is important to MECG members, as well as to the residents of Missouri. As the vehicle market continues to evolve into more electric vehicles, the need to efficiently and affordably charge these vehicles cannot withstand other delays. As fleets transition

to electric, the growing need for accurate billing is paramount for accurate total cost of ownership models and accurate deployment of assets. For passenger vehicles needing to charge at public use facilities, it is important to have affordable costs to allow for affordable charging.

Q. HOWS DOES MECG PROPOSE TO DESIGN THE ALTERNATIVE LGS AND SP RATES FOR EV CHARGING?

A. As discussed in Missouri File No. ER-2022-0337, and for the purposes of the docket, MECG proposes to reallocate the summer demand charge revenue requirement to the first block of the summer energy rate and reallocate the winter demand charge revenue requirement to the first block of the winter energy rate. This reallocation would serve two purposes: first, it would reduce the barrier to entry for very low usage EV chargers versus LGS and SP's demand charges; and second, it would recover the demand charge revenue requirements in the low load factor first blocks (up to approximately 20.8 percent monthly load factor), which would provide more meaningful fixed cost recovery than spreading demand charge revenue across the three energy blocks.

Q. HAVE YOU CALCULATED ILLUSTRATIVE LGS-EV RATES AT THE COMPANY'S PROPOSED REVENUE REQUIREMENT FOR LGS?

A. Yes, as shown in Table 1 below.

Table 1. Ameren Proposed LGS Rates Versus MECG Proposed LGS-EV Rates.

Charge	Ameren Proposed LGS	MECG Proposed LGS-EV
Customer Charge	$108.44/month	$108.44/month
Demand Charges		
Summer	$7.15/kW	
Winter	$2.66/kW	
Energy Charges		
Summer		
First 150 HU	$0.1285/kWh	$0.1837/kWh
Next 200 HU	$0.0966/kWh	$0.0966/kWh
Over 350 HU	$0.0650/kWh	$0.0650/kWh
Winter		
First 150 HU	$0.0806/kWh	$0.1035/kWh
Next 200 HU	$0.0600/kWh	$0.0600/kWh
Over 350 HU	$0.0471/kWh	$0.0471/kWh

Source: Exhibit ESA-2

Q. HAVE YOU CALCULATED ILLUSTRIVE SP-EV RATES AT THE COMPANY'S PROPOSED REVENUE REQUIREMENT FOR SP?

A. Yes, as shown in table 2 below.

Table 2. Ameren Proposed SP Rate Versus MECG Proposed SP-EV Rates.

Charge	Ameren Proposed SP	MECG Proposed SP-EV
Customer Charge	$371.39/ month	$371.39/ month
Demand Charge		
Summer	$6.14/kW	
Winter	$2.23/kW	
Energy Charges		
Summer		
First 150 HU	$0.1240/kWh	$0.1666/kWh
Next 200 HU	$0.0932/kWh	$0.0932/kWh
Over 350 HU	$0.0625/kWh	$0.0625/kWh
Winter		
First 150 HU	$0.0781/kWh	$0.0949/kWh
Next 200 HU	$0.0581/kWh	$0.0581/kWh
Over 350 HU	$0.0453/kWh	$0.0453/kWh

Source: Exhibit ESA-3

Q. WHAT IS MECG'S RECOMMENDATION TO THE COMMISSION WITH REGARD TO SPECIFIC EV CHARGING RATES?

A. MECG recommends that the Commission require Ameren to create alternative optional LGS-EV and SP-EV rates for EV charging customers with load sizes that would qualify to take service on LGS or SP rates.

Q. DOES THIS COMPLETE YOUR TESTIMONY?

A. Yes, it does.

Eric S. Austin

Sr Manager, Regulatory, Energy Transformation
Walmart Inc.
Business Address: 2608 SE J Street, Bentonville, Arkansas 72716

EXPERIENCE

October 2023 – present
Walmart Inc., Bentonville AR
Sr. Manager, Utility Partnerships

March 2022 – October 2023
American Electric Power
Manager, Electric Transportation and Public Charging

March 2019 – March 2022
Francis Energy
SVP, Utility Operations

January 2019 – Jan 2021
Ausco Energy Services
Owner, General Manager

August 2012 - December 2016
Western Farmers Electric Cooperative
C&I Market Manager

EDUCATION
2009 Texas A&M University -Commerce Bachelor of Science
Current Texas A&M University Master of Legal Studies

Filed Testimony and Comments
2015
New Mexico
Senate Bill 249
Renewable Energy bill allowing the transfer of heat from a ground source heat pump to be calculated and used as renewable energy.
2023
New Hampshire
DE-23-039
Application of Granite State Power, Liberty, for Authority to Adjust Electric Rates.

2024

Washington

WA-U-210590

Proceeding to develop a policy statement addressing alternatives to traditional cost of service rate making, including performance measures or goals, targets, performance incentives, and penalty mechanisms.

New Mexico

23-00271-UT

Application for Authorization of Large Customer Renewable Connect Program and Tariff and Other Associated Relief.

Nevada

24-02026

Public Utility Commission Docket for Sierra Pacific Power Company d/b/a NV Energy's Electric General Rate Case Filing

Oklahoma

2023-000087

Application for Electric Rate Adjustment for Oklahoma Gas and Electric Company

2023-000086

Application for Electric Rate Adjustment for Public Service of Oklahoma, an American Electric Power Company.

Louisiana

U-36956

Application for Electric Rate Increase, weather through a Formula Rate Plan extension or rate review and proposed electric vehicle program or rates.

Texas

Docket No. 55338

Proceeding to Resolve Issues in Docket No. 53719 Related to Transportation Electrification and Charging Infrastructure.

Docket No. 56548

Center Point application of its Transmission and Distribution system resiliency plan.

Docket No. 56545

Oncor Energy application of its Transmission and Distribution system resiliency plan.

Docket No. 56735

Entergy Texas, Inc., application of its Transmission and Distribution system resiliency plan.

Docket No. 56954

Texas New Mexico Power application of its Transmission and Distribution system resiliency plan.

Docket No. 57259

Southwestern Electric Power Company, an American Electric Power company, application of its Transmission and Distribution system resiliency plan.

Docket No. 57057

AEP Texas's application of its Transmission and Distribution system resiliency plan.

Indiana

Cause No. 46090

Indiana Michigan Power's application for Electric Transportation programs and public charging rates.

Oregon

Docket No UE-233

Pacificorp's Application for Electric rate adjustments.

Wisconsin

Docket No 5-UR-111

WEPCo/WG application for electric and gas rate adjustments.

INDUSTRY TRAINING

2012 Guernsey, Utility Rate case and Cost of Service training
2010 NRECA CKAE certification
2024 "The Basics" New Mexico State Utility Rate Management Training

Exhibit ESA-2

Derivation of MECG Proposed Rate Design for Large General Service - EV Option at Ameren's

LGS	Billing Units	Proposed Rates	Revenue	Reallocate Demand Charge Revenue to First 150 HU For Each Season		Adjusted Charge Revenues	Resulting Energy Rates
Customer Charge		$108.44					$108.44
Standard	128,388	$ 125.27	$ 16,083,165			$ 16,083,165	$ 125.27
TOU Bills	696	$ -	$ -			$ -	$ -
Low Income Charge	128,388	$ 2.11	$ 270,899			$ 270,899	$ 2.11
Demand Charges							
Summer	8,018,101	$ 7.15	$ 57,329,422	$ (57,329,422)		$ -	$ -
Winter	14,604,472	$ 2.66	$ 38,847,896	$ (38,847,896)		$ -	$ -
Energy Charges							
Summer							
First 150 HU	1,038,383,740	$ 0.1285	$ 133,432,311		$ 57,329,422	$ 190,761,733	$ 0.1837
Next 200 HU	1,118,967,542	$ 0.0966	$ 108,092,265			$ 108,092,265	$ 0.0966
Over 350 HU	448,427,484	$ 0.0650	$ 29,147,786			$ 29,147,786	$ 0.0650
On-Peak	8,238,780	$ 0.0114	$ 93,922			$ 93,922	$ 0.0114
Off-Peak	14,488,381	$ (0.0079)	$ (114,458)			$ (114,458)	$ (0.0079)
Winter							
First 150 HU	1,697,867,048	$ 0.0806	$ 136,848,084		$ 38,847,896	$ 175,695,980	$ 0.1035
Next 200 HU	1,807,877,873	$ 0.0600	$ 108,472,672			$ 108,472,672	$ 0.0600
Over 350 HU	768,141,201	$ 0.0471	$ 36,179,451			$ 36,179,451	$ 0.0471
Seasonal Energy	357,910,289	$ 0.0471	$ 16,857,575			$ 16,857,575	$ 0.0471
On-Peak	14,067,404	$ 0.0035	$ 49,236			$ 49,236	$ 0.0035
Off-Peak	25,865,395	$ (0.0022)	$ (56,904)			$ (56,904)	$ (0.0022)
Total	7,237,575,177		$ 681,533,320			$ 681,533,320	

Source:

Schedule NSB-D3, page 5

Derivation of MECG Proposed Rate Design for Small Primary Service - EV Option at Ameren's Proposed

SP	Billing Units	Proposed Rates	Revenue	Reallocate Demand Charge Revenue to First 150 HU For Each Season	Adjusted Charge Revenues	Resulting Rates
Customer Charge		$371.39				$371.39
Standard	7,992	$ 426.93	$ 3,412,025		$ 3,412,025	$ 426.93
TOU Bills	239	$ -	$ -		$ -	$ -
Low Income Charge	7,992	$ 2.11	$ 16,863		$ 16,863	$ 2.11
Demand Charges						
Summer	2,834,971	$ 6.14	$ 17,406,722	$ (17,406,722)	$ -	$ -
Winter	5,037,989	$ 2.23	$ 11,234,715	$ (11,234,715)	$ -	$ -
Energy Charges						
Summer						
First 150 HU	409,045,780	$ 0.1240	$ 50,721,677	$ 17,406,722	$ 68,128,399	$ 0.1666
Next 200 HU	493,755,152	$ 0.0932	$ 46,017,980		$ 46,017,980	$ 0.0932
Over 350 HU	348,538,750	$ 0.0625	$ 21,783,672		$ 21,783,672	$ 0.0625
On-Peak	15,033,994	$ 0.0084	$ 126,286		$ 126,286	$ 0.0084
Off-Peak	30,524,712	$ (0.0055)	$ (167,886)		$ (167,886)	$ (0.0055)
Winter						
First 150 HU	668,605,372	$ 0.0781	$ 52,218,080	$ 11,234,715	$ 63,452,795	$ 0.0949
Next 200 HU	800,536,074	$ 0.0581	$ 46,511,146		$ 46,511,146	$ 0.0581
Over 350 HU	577,956,004	$ 0.0453	$ 26,181,407		$ 26,181,407	$ 0.0453
Seasonal Energy	168,200,102	$ 0.0454	$ 7,636,285		$ 7,636,285	$ 0.0454
On-Peak	27,407,951	$ 0.0031	$ 84,965		$ 84,965	$ 0.0031
Off-Peak	52,816,499	$ (0.0019)	$ (100,351)		$ (100,351)	$ (0.0019)
Reactive Charge	1,198,900	$ 0.46	$ 552,573		$ 552,573	$ 0.46
Rider B						
34.5/69 kV	821,787	$ (1.43)	$ (1,175,155)		$ (1,175,155)	$ (1.43)
138 kV	5,160	$ (1.69)	$ (8,720)		$ (8,720)	$ (1.69)
Total	3,466,637,234		$ 282,452,281		$ 282,452,281	

Source:

Schedule NSB-D3, page 6