

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

In the Matter of the Application)	
Of Union Electric Company)	<u>Case No. ET-2016-0246</u>
d/b/a Ameren Missouri for Approval)	Tracking No. YE-2017-0030
of a Tariff Setting a Rate for)	
Electric Vehicle Charging Stations)	
)	
In the Matter of Union Electric)	
Company d/b/a Ameren Missouri's)	<u>Case No. ER-2016-0179</u>
Tariffs to Increase Its Revenues)	Tracking No. YE-2017-0003
For Electric Service)	

STAFF'S RESPONSE TO MOTION TO CONSOLIDATE

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Response* in this matter hereby states:

1. On August 15, 2016, Union Electric Company d/b/a Ameren Missouri filed an *Application for Approval of a Tariff Authorizing a Pilot Program for Electric Vehicle Charging Stations*. The Commission directed Staff to file a recommendation, for which Staff began a review and investigation. Ameren Missouri had previously filed a request to *Increase Its Revenues for Electric Service*, Case No. ER-2016-0179, on July 1. On September 12, some of the intervening parties (movants) in this matter filed a *Motion of Certain Intervenors to Consolidate Ameren Missouri Rate Case with and Ameren's Application for Approval of Electric Vehicle Charging Stations*.

2. The *Motion* states that Ameren Missouri's *Application* anticipates that some amount of investment related to the project may be added to rate base through the true-up of the pending general rate case. However, the movants note Ameren Missouri did not include any costs associated with the requested pilot project in its proposed revenue requirement for the rate case. The movants propose that this matter

should be consolidated with the general rate case and the matter of the pilot program taken into consideration in conjunction with the issues in the general rate case.

3. Staff neither takes a position of agreement or disagreement with the movants' position on the pilot program at this time, but agrees that this matter would be better taken into consideration in conjunction with the pending general rate case.

4. Staff also notes that should the Commission determine that it is appropriate to consolidate this matter, Case No. ET-2016-0246 with the pending general rate case, Case No. ER-2016-0179, the tariff sheets in this matter, presently set to go into effect October 15, 2016, would need to be suspended pending the outcome of the general rate case.

WHEREFORE, Staff supports the movants' *Motion to Consolidate* and recommends the Commission consolidate this matter into the pending general rate case for consideration together; suspend the related tariff sheets; and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

Whitney Payne

Legal Counsel

Missouri Bar No. 64078

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 751-8706 (Telephone)

(573) 751-9285 (Fax)

whitney.payne@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 22nd day of September, 2016, to all counsel of record.

/s/ Whitney Payne