

**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 Approval)	<u>File No. ET-2016-0246</u>
Of a Tariff Setting a Rate for Electric Vehicle)	Tariff No. YE-2017-0030
Charging Stations)	

ORDER REJECTING TARIFF FILING AND DIRECTING FILING

Issue Date: October 6, 2016

Effective Date: October 6, 2016

On August 15, 2016, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed an application requesting that the Missouri Public Service Commission approve a tariff authorizing a pilot program to install and operate electric vehicle charging stations at locations within Ameren Missouri’s service area along the Interstate 70 corridor between St. Louis and Boonville, Missouri, and in Jefferson City, Missouri. The tariff has an effective date of October 15, 2016. The Commission granted timely requests to intervene filed by the Midwest Energy Consumers Group; the Missouri Department of Economic Development – Division of Energy (“Division of Energy”); Natural Resources Defense Council (“NRDC”); Brightergy, LLC; ChargePoint, Inc.; Sierra Club; Consumers Council of Missouri; and the Missouri Industrial Energy Consumers.

The Commission set a deadline of September 28, 2016 to file recommendations regarding the application and proposed tariff, and timely filings were submitted by Staff, NRDC, and Sierra Club. Staff recommends that the Commission only approve the proposed tariff sheets on the condition that all revenues, expenses and investment associated with the program are recorded below the line in order to hold ratepayers

harmless, and that the company gather data and report annually on the impact of charging stations on grid reliability.

NRDC and Sierra Club are both supportive of vehicle electrification and the development of Ameren Missouri's electric vehicle infrastructure pilot program. Both parties point out a number of benefits of transportation electrification and argue that access to charging stations is critical for development of the electric vehicle market. However, both parties also disagree with Ameren Missouri's use of a flat time-based electricity rate and recommend that Ameren Missouri replace that rate with a volumetric rate that charges based on the amount of electricity consumed. They argue that the time-based rate structure discriminates against electric vehicle drivers with less powerful onboard chargers and threatens to eliminate the fuel cost savings of driving on electricity for that large group of electric vehicles. Sierra Club also suggests, in the alternative, a time-based tariff on a per minute basis rather than 15-minute intervals.

On September 30, 2016, the Office of the Public Counsel ("OPC") filed a motion to reject or suspend the tariff filing, stating that it supports Staff's recommendation. On October 4, 2016, Ameren Missouri filed responses to Staff, OPC, NRDC and Sierra Club. Ameren Missouri opposes Staff's recommendation and OPC's motion, but does not oppose the recommendation of NRDC and Sierra Club to modify the proposed time-based rate structure by substituting a rate based on the amount of energy a charging station supplies to an electric vehicle. Ameren Missouri also submitted as Attachment A to its response a sample tariff with those proposed changes to its original filed tariff consistent with the recommendations of NRDC and Sierra Club. On October 5, 2015, the Division of

Energy submitted a response supporting the modified tariff filed by Ameren Missouri as Attachment A.

The Commission finds that the arguments of NRDC and Sierra Club are persuasive that a volumetric rate that charges based on the amount of electricity consumed or a time-based tariff on a per minute basis rather than 15-minute intervals would help to prevent discrimination against electric vehicle drivers with less powerful onboard charging devices. Moreover, Ameren Missouri does not oppose this change and has proposed alternate tariff language in Attachment A to its response filed on October 4, 2016. Therefore, the Commission will reject Ameren Missouri's original tariff filing and authorize it to file a new tariff consistent with the sample tariff in Attachment A. Any motion for expedited treatment should demonstrate good cause under Commission rule 4 CSR 240-2.080(14) why the tariff should be made effective in less than thirty days. The Commission will also provide an opportunity for other parties to respond or comment on Ameren Missouri's new tariff filing.

THE COMMISSION ORDERS THAT:

1. The tariff submitted under Tariff File No. YE-2017-0030 on August 15, 2016, by Union Electric Company d/b/a Ameren Missouri is rejected.
2. The specific tariff sheets rejected are:

MO. P.S.C. Schedule No. 6

1st Revised Sheet No. 166, Canceling Original Sheet No. 166
Original Sheet No. 166.1

3. No later than October 7, 2016, Union Electric Company d/b/a Ameren Missouri is authorized to file a new tariff in this proceeding consistent with the sample tariff in Attachment A to its response filed on October 4, 2016.

4. Any party wishing to comment or respond to a new tariff filed by Union Electric Company d/b/a Ameren Missouri as authorized herein shall do so no later than October 13, 2016.

5. This order shall be effective when issued.



BY THE COMMISSION

A handwritten signature in black ink that reads "Morris L. Woodruff". The signature is written in a cursive style.

Morris L. Woodruff
Secretary

Michael Bushmann, Senior Regulatory
Law Judge, by delegation of authority
pursuant to Section 386.240, RSMo 2000.

Dated at Jefferson City, Missouri,
on this 6th day of October, 2016.