OF THE STATE OF MISSOURI

In The Matter of the Application of Union)
Electric Company d/b/a/ Ameren Missouri) File No. ET-2018-0132
For Approval of Efficient Electrification Program)

M ISSOURI DIVISION OF ENERGY'S STATEMENT OF POSITIONS

COMES NOW the Missouri Department of Economic Development – Division of Energy ("DE"), by and through the undersigned counsel, and for its *Statement of Positions* in the above-styled matter states:

LIST OF ISSUES

Should the Commission approve, reject, or modify Ameren Missouri's Charge
 Ahead – Electric Vehicles Program?

The Commission should approve a modified version of Ameren Missouri's Charge Ahead – Electric Vehicles Program. The rebate program can be a useful tool in assisting with the creation of a minimum practical network of charging stations in the state by stimulating private investment in the market. However, the Division of Energy recommends allocating 10% of total program funds to support charging station deployment in underserved and low-income communities in the Ameren Missouri service territory. The allocation to such areas will promote more equitable access to electric vehicle charging and the associated benefits of cost savings resulting from electric vehicle use, reduced vehicle pollution, and improved health. Individuals traveling to and through such communities would also have greater assurance that they can recharge their vehicles, further enabling these communities to participate in Missouri's economic advancement.

a. Has Ameren Missouri provided sufficient evidence that there is a need for the program?

Sufficient evidence has been provided that there is a need for the Charge

Ahead – Electric Vehicles Program. While there are an increased number of
charging stations in the more densely populated areas of the state and on
some roadways, the infrastructure is inadequate elsewhere. The cost of
building charging stations is an impediment to private industry investment in
the electric vehicle charging station ("EVCS") market, as well as a barrier to
creating an environment in which Missourians can be secure and comfortable
using electric vehicles – or in which non-residents (e.g., tourists, shippers) can
have confidence in driving electric vehicles through the state. The lack of
EVCSs in critical locations and the insufficient availability of funds to build out
the infrastructure both threaten Missouri's preparedness to meet the growing
market trend toward electric vehicles.

Ameren Missouri and the proponents of Charge Ahead – Electric Vehicles program have provided competent and substantial evidence supporting the rebate program. The program is reasonable and in the public interest.

b. Has Ameren Missouri provided sufficient evidence that the program is cost effective?

DE takes no position on this issue at this time but reserves the right to do so following evidence presented at the hearing.

c. If the program is approved, what is the appropriate cost recovery mechanism?

DE takes no position on this issue at this time but reserves the right to do so following evidence presented at the hearing.

d. If the program is approved, what conditions, if any, should be imposed by the Commission?

DE recommends allocating 10% of the total program budget towards EVCS deployment in underserved and low-income communities within the Company's service area. This allocation supports equitable access to charging stations for residents of these communities and those drivers traveling to or through these communities.

2. Should the Commission approve, reject, or modify Ameren Missouri's Charge Ahead – Business Solutions Program?

DE takes no position regarding Ameren's Business Solutions Program at this time but reserves the right to do so following evidence presented at the hearing.

3. Should the Commission grant the variances requested by Ameren Missouri?
DE takes no position on this issue at this time but reserves the right to do so following evidence presented at the hearing.

WHEREFORE, the Missouri Division of Energy respectfully files its *Statement of Positions*.

Respectfully submitted,

/s/ Michael Lanahan

Michael Lanahan Acting General Counsel Missouri Bar No. 67487 Department of Economic Development P.O. Box 1157 Jefferson City, MO 65102 (573) 522-3304

michael.lanahan@ded.mo.gov

Attorney for Missouri Division of Energy

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 27th day of November, 2018.

/s/ Michael Lanahan
Michael Lanahan