BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of a Working Case to Evaluate Potential Mechanisms for Facilitating Installation of Electric Vehicle Charging Stations

Case No. EW-2019-0229

REQUEST FOR PARTY SUBMISSIONS

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission"), by and through counsel, and states the following:

1. On February 7, 2019, the Commission opened this docket to evaluate potential mechanisms for facilitating the installation of electric vehicle charging stations; and on February 14, 2019, the Commission issued an order directing interested stakeholders to work toward finding the best solutions for developing Missouri's EV charging network as quickly as practicable, and ordered Staff, Ameren Missouri, and any other interested parties to participate in this working case to evaluate such models.

2. On February 15, Staff filed notice of a workshop to be held on March 21, 2019 in furtherance of the Commission's *Order*.

3. To facilitate the discussion, Staff requests that representatives for all participating parties state their party's opinion identifying the categories of costs that should be eligible for subsidization by utilities or should be eligible for special tariff/accounting/ratemaking treatment under a "make ready" approach.

4. Not later than March 14, please file in this docket the opinion of your party as to which of the below costs should be eligible for subsidization by utilities or eligible for special tariff/accounting/ratemaking treatment under a "make ready" approach:

Internal utility costs

- a. Necessary Distribution/Transmission system upgrades to existing infrastructure
- b. Internal utility costs of distribution extension as allocated
- c. Distribution equipment from existing infrastructure to service drop
- d. Transformer at service drop
- e. Service drop
- f. Meter
- g. Capitalized labor associated with the above
- h. Property taxes associated with the above
- i. Insurance associated with the above

Customer costs

- a. Customer's portion of construction allowance
- b. Infrastructure from meter to charger
- c. Charger
- d. Charger installation
- e. Charger awning/kiosk construction
- f. Site engineering electrical design work for charging facilities

- g. Pavement of charging area
- h. Other non-Charger electrical (lighting, kiosk)
- i. Other on-site service connections (service line to C store, restrooms)
- j. Other on-site construction (C store, restrooms)
- k. Construction and/or pavement of access from public roadway
- I. Pavement of parking not in charging area
- m. Site drainage
- n. Site engineering electrical design work for non-charging facilities
- o. Site engineering pavements, drainage
- p. Permitting of civil engineering of site
- q. Permitting of charger installation
- r. Engineering/permitting of other non-Charger electrical (lighting, kiosk)
- s. Engineering/permitting of other non-Charger electrical (C store, restrooms)
- t. Land cost
- u. Land acquisition cost (title, etc.)
- v. Land acquisition process cost (real estate search and evaluation)
- w. Capitalized labor associated with any of the above

- x. Property taxes associated with any of the above
- y. Insurance associated with any of the above

WHEREFORE, Staff requests that the Commission order each party to file its opinion as to which of the above-referenced cost categories should be eligible for subsidization by utilities or eligible for special tariff/accounting/ratemaking treatment under a "make ready" approach in File No. EW-2019-0229, by March 14, 2019; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

<u>/s/ Whitney Payne</u>

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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 5th day of March, 2019, to all counsel of record.

<u>/s/ Whitney Payne</u>