

**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 )  
of a Tariff Setting a Rate for )  
Electric Vehicle Charging Stations )

**Case No. ET-2016-0246**  
Tracking No. YE-2017-0030

**STAFF'S POSITION STATEMENT**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff) and for its *Position Statement* on the listed issues as reflected in the *List of Issues, List and Order of Witnesses, Order of Opening Statements and Order of Cross-Examination* filed by Ameren Missouri on behalf of itself, Staff, the Missouri Division of Energy and Kansas City Power and Light, states as follows:

**1. Commission Jurisdiction**

**Staff Witness: Natelle Dietrich**

*Does the Commission have jurisdiction to regulate utility-owned and operated electric vehicle charging stations operated in a utility's service area?*

**Staff Position:** Yes, the Commission has jurisdiction to regulate utility owned and operated electric vehicle charging stations. The Commission has jurisdiction to regulate public electric utilities engaged in the practice of manufacturing, selling or distributing electricity to consumers for light, heat and power under Section 386.250, RSMo. An electric vehicle charging station is a specialized device designed for consumers to deliver electricity to their electric vehicle battery to power the vehicle's functions. When said charging station is operated by a regulated electric utility for the

purpose of selling electricity to those consumers it falls squarely within the Commission's jurisdiction.

Should the Commission agree with Staff's position and find that it has jurisdiction over electric vehicle charging stations, the costs associated with installing the charging stations and the revenues attributed to the stations should be booked above the line. Those costs and revenues will be reviewed by Staff in an Ameren Missouri general rate case, and a revenue imputation will be applied for any costs exceeding the amount of revenues. This is an evolution from testimony of Staff's position on this point and reflects both its position that electric vehicle charging stations operated by an electric utility are part of its regulated business operations and its concern that the ratepayers not bear the risk and provide a subsidy supporting the Company's effort to establish a new market for its service.

## **2. Public Policy**

### **Staff Witness: Natelle Dietrich**

*Are there public benefits realized from the installation of electric vehicle charging stations, specifically if the Commission were to approve Ameren Missouri's proposed pilot project?*

**Staff Position:** Staff is appreciative of the various public policy arguments related to promoting renewable or clean energy and reducing carbon emissions but Staff takes no position as to whether any concrete benefits, which would be applicable to the general public, can be realized from the proposed installation of electric vehicle charging stations.

### 3. Rates

**Staff Witness: Byron Murray**

*Does Ameren Missouri's proposed tariff represent the proper rate design for its EV charging station pilot project?*

**Staff Position:** The tariff Ameren Missouri has currently proposed reflects a per minute rate for Level 2 charging stations and a per kWh rate for Level 3 charging stations. Staff's position is that both the Level 2 and Level 3 charging station rates should be based on the same metric, be that per minute or per kWh.

**WHEREFORE,** Staff prays that the Commission will accept this *Position Statement*, and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

**/s/ Whitney Payne**

Whitney Payne

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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 6th day of January, 2017, to all counsel of record.

**/s/ Whitney Payne**