

**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)	File No. ET-2016-0246
Of a Tariff Setting a Rate for Electric Vehicle)	Tariff No. YE-2017-0052
Charging Stations)	

COMMISSIONER SCOTT T. RUPP’S DISSENTING OPINION

Last week the Missouri Public Service Commission (PSC), on a vote of 4-1, promulgated an order stating that electric vehicle charging stations (EVCS) will not be regulated in the state of Missouri. There was one dissenting vote, and I cast it.

I feel that EVCSs should be regulated when they are owned and operated by a regulated utility. A position held by several other states’ public service commissions who have seriously considered this issue and argued by the Sierra Club and Natural Resources Defense Counsel in this proceeding.

The reason this issue was before the PSC is that the popularity of EVs is growing as well as the distances traveled between charges. In Missouri, when you get out of the urban areas of St. Louis and Kansas City, there are very long gaps between charging stations (if they exist at all), increasing the range anxiety of EV drivers. The proposal put forward by Ameren Missouri sought to build EV stations along the Interstate 70 corridor, especially in more rural areas where EVCS do not currently exist.

Ameren’s goal was to expand the network of charging stations to support the increasing market for EVs and to have them regulated to make them economically feasible for the utility to install and maintain. However, I believe the order that was passed by the PSC does not accomplish that goal.

The order that passed, of which I opposed, was predicated on the belief that a market for EVCS currently exists in Missouri. It states that a utility must find a third party partner who will pay the costs to install and maintain a charging station. To put real numbers to this situation, according to the evidence in the record charging equipment costs \$60,000, plus another \$20,000 for construction/installation, and several thousand per year of maintenance. In other words, \$80,000 upfront costs plus several thousand per year in maintenance. That is a massive capital cost in hopes of making a small margin on the price of electricity, on a minuscule volume of customers, even if those customers patronized your business while their car was charging.

There is little evidence of a competitive EVCS market along these corridors let alone in Ameren's service territory or the state of Missouri. Of the 19 EVCS that exist, 12 of them provide free charging. Of the current 19 EVCSs along the I-70 corridor Ameren wishes to build its EVCSs, 15 are located in St. Louis City (urban) or St. Louis County (suburban).

I believe that it will be tough to find willing partners in rural areas, that would be solely dependent on EV drivers to stop and charge their vehicle on a cross state trip, to upfront the capital costs for the construction of an EV charging station. That means that the goal of expanding the EV charging infrastructure will not penetrate outside of the urban areas of our state and that our actions as a PSC will not encourage nor support EV adoption.

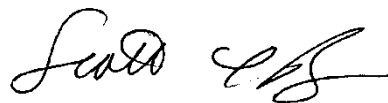
Not regulating EVCSs owned by electric corporations will stifle the development of the EV market in Missouri and consequently the EVCS market as well. The current lack of EVCSs particularly outside the major metropolitan areas of the state limits EV

adoption while the lack of EVs acts as a disincentive for competitive enterprises from building an EVCS network.

Today, electric corporations are the only businesses that have the market incentives to invest in an EVCS network. Not regulating EVCSs owned by electric corporations will mean higher marginal rates for all ratepayers. EV load can increase utility sales without incurring significant infrastructure costs, thereby spreading fixed costs across greater sales, lowering the marginal cost of electricity for all ratepayers—whether or not they own an EV.

I firmly believe that if our state wants to create a strong infrastructure of EVCSs that we need to regulate our utilities in the buildout of EVCSs across their footprint while allowing third-party entrepreneurs to compete in that space as well. With that approach, Missouri will realize a stronger, faster, and larger EVCS network.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Scott Rupp", written in a cursive style.

Commissioner Scott T. Rupp

Dated at Jefferson City, Missouri
This 27th day of April, 2017