

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSOIN**

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**AMEREN ILLINOIS COMPANY  
D/B/A AMEREN ILLINOIS**

**PETITION FOR APPROVAL OF BENEFICIAL  
ELECTRIFICATION PURSUANT TO SECTION  
45 OF THE ELECTRIC VEHICLE ACT**

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**Docket No. 22-0431/22-0443**

**Direct Testimony of  
Eric Borden and Courtney Lane**

**On Behalf of  
The People of the State of Illinois**

**AG Exhibit 1.0**

**September 15, 2022**

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AG Ex. 1.1: Resume of Eric Borden

AG Ex. 1.2: Resume of Courtney Lane

**I. INTRODUCTION AND QUALIFICATIONS**

**Q. Please state your name, title, and employer.**

**A. Mr. Borden:** My name is Eric Borden. I am a Principal Associate at Synapse Energy Economics (“Synapse”), located at 485 Massachusetts Avenue, Suite 3, Cambridge, MA 02139.

**Ms. Lane:** My name is Courtney Lane. I am a Senior Associate at Synapse Energy Economics, located at 485 Massachusetts Avenue, Suite 3, Cambridge, MA 02139.

**Q. Please describe Synapse Energy Economics.**

**A.** Synapse Energy Economics is a research and consulting firm specializing in electricity and gas industry regulation, planning, and analysis. Our work covers a range of issues, including economic and technical assessments of demand-side and supply-side energy resources; energy efficiency policies and programs; integrated resource planning; electricity market modeling and assessment; renewable resource technologies and policies; and climate change strategies. Synapse works for a wide range of clients, including state attorneys general, offices of consumer advocates, trade associations, public utility commissions, environmental advocates, the U.S. Environmental Protection Agency, U.S. Department of Energy (“DOE”), U.S. Department of Justice, the Federal Trade Commission, and the National Association of Regulatory Utility Commissioners. Synapse has over 30 professional staff with extensive experience in the electricity industry.

**Q. Please summarize your professional and educational experience.**

22 A. **Mr. Borden:** I have over ten years of experience in the energy industry and joined  
23 Synapse in 2022. From 2015 to 2022, I was a Senior Energy Expert at the Utility Reform  
24 Network (“TURN”) in California, where I served as an expert witness in numerous  
25 proceedings before the California Public Utilities Commission. I provided in-depth  
26 analysis to inform policy recommendations on a variety of energy issues, including  
27 several applications and policy-related proceedings related to electric vehicle  
28 infrastructure and policy. Prior to my role at TURN, I served as a Senior Energy Analyst  
29 at 4Thought Energy, where I conducted financial analyses based on multiple utility tariffs  
30 for a distributed generation natural gas combined heat and power firm. I also have  
31 previous consulting experience. I have a Bachelor’s degree in finance from Washington  
32 University in St. Louis and a Master’s in Public Affairs from the University of Texas at  
33 Austin. My resume is attached as AG Ex. 1.1.

34 **Ms. Lane:** I have 18 years of experience in energy policy and regulation. At Synapse, I  
35 work on issues related to performance-based regulation, grid modernization, benefit-cost  
36 analysis, rate and bill impacts, and review of distributed energy resource and electric  
37 vehicle utility filings. Prior to working at Synapse, I was employed by National Grid as  
38 the Growth Management Lead for New England where I oversaw the development of  
39 customer products, services, and business models for Massachusetts and Rhode Island. In  
40 previous roles at National Grid, I led the development of Rhode Island Annual and  
41 Three-Year Energy Efficiency Plans, led the facilitation of the Rhode Island Energy  
42 Efficiency Collaborative, and worked with key stakeholders on the development of  
43 policies and strategies to further promote energy efficiency and demand response in the

44 state. Prior to joining National Grid, I worked on regulatory and state policy issues  
45 pertaining to energy conservation, retail competition, net metering, and the Alternative  
46 Energy Portfolio Standard for Citizens for Pennsylvania’s Future. Prior to that, I worked  
47 for Northeast Energy Efficiency Partnerships, Inc. where I promoted energy efficiency  
48 throughout the Northeast.

49 I have testified before the New Hampshire Public Utilities Commission, the Maryland  
50 Public Service Commission, the New Mexico Public Regulation Commission, the  
51 Pennsylvania Public Service Commission, the Public Service Commission of the District  
52 of Columbia, and the Rhode Island Public Utilities Commission.

53 I hold a Master of Arts in Environmental Policy and Planning from Tufts University and  
54 a Bachelor of Arts in Environmental Geography from Colgate University. My resume is  
55 attached as AG Ex. 1.2.

56 **Q. On whose behalf are you testifying in this case?**

57 A. We are testifying on behalf of the People of the State of Illinois represented by the Office  
58 of the Attorney General (“AG”).

59 **Q. What is the purpose of your testimony?**

60 A. The purpose of our testimony is to review and assess the Beneficial Electrification  
61 (“BE”) Plan submitted by Ameren Illinois Company (“Ameren” or the “Company”) and  
62 to provide recommendations for improvement. We do not address all aspects of the  
63 Company’s proposal. However, silence on any issue should not be taken as acceptance of  
64 the Company’s proposals.

65 **Q. What materials did you rely on to develop your testimony?**

66 A. The sources for our testimony and exhibits are the Company's direct testimony and  
67 exhibits, public documents, and responses to discovery requests, as well as our personal  
68 knowledge and experience.

69 **Q. Were these exhibits prepared by you or under your direction?**

70 A. Yes. Our testimony and the accompanying exhibits were prepared by us or under our  
71 direct supervision and control.

72 **II. SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS**

73 **Q. Please summarize your concerns with the Company's BE Plan in the current form**  
74 **and provide your recommendations to address these concerns.**

75 A. We find several issues should be addressed to ensure Ameren's programs support the  
76 transportation electrification goals of the State while being in the best interest of  
77 ratepayers. Briefly, our conclusions and recommendations are as follows:

- 78 • At this time, the Commission and stakeholders do not have sufficient information  
79 to know whether low-income ("LI") customers will receive proportional benefits  
80 to costs that they will pay to support the BE Plans. LI customers should incur a  
81 smaller proportion of costs or be excluded from paying for these programs until  
82 Ameren can demonstrate that its programs benefit these customers to the same  
83 extent as non-LI customers.
- 84 • We understand that ICC Staff ("Staff") recently filed a motion in another BE Plan  
85 docket that may implicate the legality of three of Ameren's rebate programs that it  
86 proposes to offer in its BE Plan.

- 87           • Ameren’s Driver Education program, and its rebate proposal, is inadequately  
88           supported given the level of requested budget. This funding to provide rebates  
89           would be better spent on electrifying vehicles that have the ability to cover a  
90           broader geographic range and serve more customer such as school busses and  
91           other forms of public transit.
  
- 92           • Ameren’s proposal to potentially enroll customers beyond expected participation  
93           levels lacks transparency and does not adequately protect ratepayers from  
94           unexplained cost overruns. At minimum, the utility should be required to request  
95           Commission authorization and provide an explanation if it expects to spend above  
96           its annual forecasted budget.
  
- 97           • Ameren does not appear to adequately ensure access to funding for LI programs  
98           and individuals. We recommend there be no budgetary shifting allowed between  
99           LI and non-LI programs.
  
- 100          • Ameren’s Customer Fleet Assessment program does not protect ratepayers from  
101          funding entities that lack concrete plans to electrify. We recommend a minimal  
102          cost-sharing mechanism of 10 percent to ensure program funds are spent  
103          effectively and minimize free ridership in the program.
  
- 104          • Ameren’s assumption in its benefit-cost analyses that 100 percent of program EV  
105          adoption is due to its subsidy programs is unrealistic and overstates the benefits of  
106          its programs. A third-party evaluation of free ridership in Ameren’s programs

107 should be implemented to modify future iterations of programs and modeling  
108 assumptions.

- 109 • We support Ameren’s Community Engagement and Consultation program  
110 because a grassroots approach to equity issues is the most likely to result in  
111 tangible benefits to LI residents and communities. However, we note that  
112 implementation and ongoing tracking and reporting to Staff will be critical for  
113 program success.

114  
115 **III. REGULATORY CONTEXT**

116 **Q. What is the regulatory context for Ameren’s Plan?**

117 A. The Climate and Equitable Jobs Act (“CEJA” or the “Act”) establishes a goal of adopting  
118 1,000,000 electric vehicles (“EVs”) in Illinois by 2030 and requires electric utilities that  
119 serve more than 500,000 customers to file a BE Plan with the Commission no later than  
120 July 1, 2022 for beneficial electrification programs to support the rapid deployment of  
121 EVs and make-ready infrastructure statewide.<sup>1</sup>

122 **Q. What is considered a beneficial electrification program?**

123 A. CEJA defines beneficial electrification programs as those “that lower carbon dioxide  
124 emissions, replace fossil fuel use, create cost savings, improve electric grid operations,  
125 reduce increases to peak demand, improve electric usage load shape, and align electric  
126 usage with times of renewable generation.”<sup>2</sup> The Act further defines these programs to  
127 include demand response and optimized charging programs that encourage charging at

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<sup>1</sup> 20 ILCS 627/45(a)(1) and (d).

<sup>2</sup> *Id.* at 627/45(b).



128 times beneficial to the electric grid; time-of-use and hourly pricing electric rates; and  
129 incentives for electrification and associated infrastructure directed to specific sectors such  
130 as transit, school buses, fleets, government, and public corridors.<sup>3</sup> The programs should  
131 also target population segments of equity investment eligible and/or LI individuals and  
132 communities.<sup>4</sup>

133 **Q. What are the requirements of the BE Plan?**

134 A. The Act states that the BE Plan shall, at a minimum, address the following ten  
135 requirements:<sup>5</sup>

- 136 1. Make-ready investments to facilitate the rapid deployment of charging equipment  
137 throughout the State, facilitate the electrification of public transit and other  
138 vehicle fleets in the light-duty, medium-duty, and heavy-duty sectors, and align  
139 with Agency-issued rebates for charging equipment;
- 140 2. The development and implementation of beneficial electrification programs,  
141 including time-of-use rates and their benefit for EV users and for all customers,  
142 optimized charging programs to achieve savings identified, and new contracts and  
143 compensation for services in those programs, through signals that allow EV  
144 charging to respond to local system conditions, manage critical peak periods,  
145 serve as a demand response or peak resource, and maximize renewable energy use  
146 and integration into the grid;

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<sup>3</sup> *Id.* at 627/45(b)(1-15).

<sup>4</sup> *Id.* at 627/45(b)(10).

<sup>5</sup> *Id.* at 627/45(d)(i-x).

- 147           3. Optional commercial tariffs utilizing alternatives to traditional demand-based rate  
148           structures to facilitate charging for light duty, heavy duty, and fleet EVs;
- 149           4. Financial and other challenges to EV usage in LI communities, and strategies for  
150           overcoming those challenges, particularly in communities and for people for  
151           whom car ownership is not an option;
- 152           5. Methods of minimizing ratepayer impacts and exempting or minimizing, to the  
153           extent possible, LI ratepayers from the costs associated with facilitating the  
154           expansion of EV charging;
- 155           6. Plans to increase access to Level 3 Public Electric Vehicle Charging  
156           Infrastructure to serve vehicles that need quicker charging times and vehicles of  
157           persons who have no other access to charging infrastructure, regardless of  
158           whether those projects participate in optimized charging programs;
- 159           7. Whether to establish charging standards for type of plugs eligible for investment  
160           or incentive programs, and if so, what standards;
- 161           8. Opportunities for coordination and cohesion with EV and EV charging equipment  
162           incentives established by any agency, department, board, or commission of the  
163           State, any other unit of government in the State, any national programs, or any  
164           unit of the federal government;
- 165           9. Ideas for the development of online tools, applications, and data sharing that  
166           provide essential information to those charging EVs, and enable an automated

charging response to price signals, emission signals, real-time renewable generation production, and other Commission-approved or customer-desired indicators of beneficial charging times; and

10. Customer education, outreach, and incentive programs that increase awareness of the programs and the benefits of transportation electrification, including direct outreach to eligible communities.

#### **IV. AMEREN'S BENEFICIAL ELECTRIFICATION PLAN**

##### **Summary of Ameren's Beneficial Electrification Plan**

**Q. Please summarize Ameren's BE Plan.**

A. Ameren's BE Plan builds off its existing Commission-approved and recently enacted tariffs and programs, such as Rider EVCP – Optional Electric Vehicle Charging Program ("Rider EVCP"), which the Commission approved in ICC Docket No. 20-0710. Rider EVCP is available to Ameren's delivery customers and implements and administers optional EV charging programs. Rider EVCP currently contains six charging programs. These programs are: Residential, Multifamily Facility, Education Facility, Transit Facility, Corridor Facility, and Non-Corridor Facility.<sup>6</sup> The main thrust of Ameren's BE Plan is altering Rider EVCP in ways that the Company believes satisfies the requirements of the Act.

**Q. What modification to existing tariffs and programs does Ameren propose?**

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<sup>6</sup> Ameren Ex. 1.0 at 7:110–123.

186 A. The Company proposes several modifications to Rider EVCP to meet the requirements of  
187 Act. For example, Ameren creates a series of rebates not formerly contained in Rider  
188 EVCP. The Company proposes to include an EV charger and wiring rebate in its  
189 Residential, Education Facility, and Transit Facility programs. Under these revisions,  
190 residential customers taking service under Rider EVCP who are equity investment  
191 eligible and/or LI would be allowed to claim a rebate of 50 percent, up to a maximum of  
192 \$1,500, to cover the costs of installing a Level 2 charger at the customer's premises.<sup>7</sup> For  
193 participating education facilities and transit facilities, they would be allowed a \$5,000  
194 rebate for the costs of installing a Level 2 or Level 3 charger if the facility was located in  
195 an equity investment eligible and/or LI community.<sup>8</sup>

196 In addition, Rider EVCP lifts the cap on existing programs. As of now, all the charging  
197 programs, except for Residential, have a participant cap that limits the number of  
198 enrollees in the programs. Ameren proposes to permanently dispose of the current  
199 participation limits but does not discuss in detail how it would manage costs if  
200 participation outstrips projections.

201 **Q. How many customers are currently enrolled in Rider EVCP?**

202 A. The Company reports that as of July 18, 2022, there were 1,217 customers enrolled in the  
203 Residential program. According to the Company, this represents 19 percent of the  
204 estimated 6,369 light duty EVs in the Ameren service territory.<sup>9</sup> For non-residential  
205 customers, Ameren reports that, as of July 18, 2022, none have opted into the

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<sup>7</sup> Ameren Ex. 2.0 at 19:417–421.

<sup>8</sup> *Id.* at 21:446–449.

<sup>9</sup> Ameren response to AG 3.01(b).

206 Multifamily Facility, Non-Corridor Facility, Education Facility, or Transit Facility

207 programs, and one customer opted into the Corridor Facility program.<sup>10</sup>

208 **Q. Does the Company propose any new programs?**

209 A. Yes. Ameren proposes several new programs for Rider EVCP targeted at multifamily,  
210 education, transit, private fleet, local government, and LI customers.

211 For the multifamily sector, Ameren proposes an Affordable Mobility Program that would  
212 leverage DOE grant assistance to provide two affordable housing facilities with four EVs  
213 and four chargers.<sup>11</sup>

214 Specific to the education sector, Ameren proposes a Driver Education program to provide  
215 high schools with education material and rebates for the purchase of EVs and charging  
216 equipment.<sup>12</sup>

217 Within the local government sector, the Company proposes a Community Engagement  
218 and Consultation program to assist communities with their EV/charging development  
219 strategies and, in equity investment eligible and/or LI communities, provide financial  
220 assistance towards executing those strategies.<sup>13</sup>

221 The Company also proposes a Customer Fleet Assessment program for education, transit,  
222 and private fleet facilities to assist operators with an economic assessment of fleet

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<sup>10</sup> Ameren response to JHM 1.01(a).

<sup>11</sup> Ameren Ex. 2.0 at 28:609–29:624.

<sup>12</sup> *Id.* at 27:582–28:595.

<sup>13</sup> *Id.* at 26:559–27:581.

electrification and a Trade Ally program to provide customers across various programs with a vetted list of qualified electrification experts.<sup>14</sup>

**Q. Please summarize Ameren’s proposed budget for this portfolio of programs.**

A. Table 1 below summarizes the Company’s proposed annual electric budget and the four-year total.

**Table 1. Ameren BE Plan Program List and Budget**

Program	Total Electric Budget				
	2021	2022	2023	2024	4 Year Total
Multi-Family Facility Program	\$0	\$182,425	\$371,380	\$1,133,555	\$1,687,359
Residential Rebate Program	\$312,715	\$512,075	\$759,357	\$1,440,082	\$3,024,228
Corridor Charging Facility Program	\$32,339	\$92,787	\$161,517	\$184,970	\$471,613
Non-Corridor Charging DC Fast Charging Facility Program	\$32,339	\$60,010	\$127,067	\$184,970	\$404,385
Affordable Mobility Program	\$0	\$0	\$35,000	\$15,000	\$50,000
Community Engagement & Consultation Program	\$0	\$30,000	\$250,000	\$1,075,000	\$1,355,000
<b>Residential Subtotal</b>	<b>\$377,393</b>	<b>\$877,296</b>	<b>\$1,704,321</b>	<b>\$4,033,576</b>	<b>\$6,992,586</b>
Education Facility Program	\$0	\$0	\$129,930	\$507,157	\$637,087
Transit Facility Program	\$0	\$0	\$65,847	\$163,072	\$228,919
Private Fleet Facility Program	\$0	\$0	\$54,883	\$421,948	\$476,831
Local Government Facility Program	\$0	\$0	\$107,344	\$582,945	\$690,289
Fleet Assessment Program	\$0	\$43,100	\$120,000	\$120,000	\$283,100
<b>Non-Residential Subtotal</b>	<b>\$0</b>	<b>\$43,100</b>	<b>\$478,004</b>	<b>\$1,795,122</b>	<b>\$2,316,227</b>
Trade Ally Program	\$0	\$0	\$385,000	\$385,000	\$770,000
Drivers Education Program	\$0	\$0	\$53,837	\$273,039	\$326,876
<b>Other Subtotal</b>	<b>\$0</b>	<b>\$0</b>	<b>\$438,837</b>	<b>\$658,039</b>	<b>\$1,096,876</b>
Portfolio Costs	\$1,412,500	\$650,000	\$2,500,000	\$1,750,000	\$6,312,500
<b>Total Portfolio</b>	<b>\$1,789,893</b>	<b>\$1,570,396</b>	<b>\$5,121,162</b>	<b>\$8,236,737</b>	<b>\$16,718,188</b>

Source: Ameren Ex. 4.0 – Cottrell\_Workpaper (Benefit-Cost Analysis)\_Corrected. Tab BE Plan Tables.<sup>15</sup>

**Q. What is the rate impact of Ameren’s BE Plan?**

<sup>14</sup> Id. at 25:538–26:558, 28:596–608.

<sup>15</sup> This figure includes bill and delivery credits, the inclusion of which is not counted in Ameren’s rate impact analysis because these credits are provided to consumers as discounts on their bills.

A. Ameren calculates the rate impact as around 0.3 percent and 0.5 percent of the delivery services revenue requirement over the program period.

	<b><u>2023</u></b>	<b><u>2024</u></b>
Delivery Services Revenue Requirement	\$1,010,482,945	\$1,010,482,945
<b><u>BE Plan</u></b>		
Line Extensions	\$52,478	\$175,911
Digital	\$334,274	\$382,215
O&M	\$2,585,000	\$4,567,169
<b>Total</b>	<b>\$2,971,752</b>	<b>\$5,125,295</b>
<b>Percent Impact of Delivery Rev Req</b>	<b>0.29%</b>	<b>0.51%</b>

*Source: Ameren Ex. 2.1 at 19.*

However, Ameren notes that comparing its program benefits to costs in the first year (2023) “demonstrates upward pressure on customer rates [...] due to high initial costs of establishing programs, but in the long term there is expected to be downward pressure on customer rates as programs benefits from later years are accrued.”<sup>16</sup> As described below, these benefits are overstated due to free ridership, which Ameren has not accounted for. In addition, Ameren does not incorporate any future BE Plan costs in its analysis. At minimum, this means customer protections must be adopted, including budget caps, as discussed below.

## V. RECOMMENDED MODIFICATIONS TO BE PLAN

**Q. Are you proposing modifications to Ameren’s BE Plan?**

A. Yes. Based on our review of Ameren’s proposed BE Plan we propose several modifications. These include the creation of customer protections related to limiting

<sup>16</sup> Ameren Ex. 4.0 at 14:257–60.

unapproved budget increases and transfers between programs and recommended improvements to specific program offerings.

**Low-income Customers May Not Receive Adequate Benefits to Justify Costs**

**Q. Does the Company’s BE Plan minimize impacts on LI customers as called for in the statute?**

A. The Company does not treat LI customers differently than other customers for purposes of cost allocation.<sup>17</sup>

**Q. Is this adequate?**

A. At this time, the Commission and stakeholders do not have sufficient information to know whether LI customers will receive proportional benefits to costs. Therefore, LI customers should incur a smaller proportion of costs or be excluded from paying for these programs until Ameren can demonstrate that its programs benefit these customers to the same extent as non-LI customers.

**Rebates – Statutory Limitations & Policy Concerns**

**Q. Do you have any concerns with Ameren’s new rebates?**

A. We understand that Staff recently filed a motion in ICC Docket Nos. 22-0432 & 22-0442 (Consol.) that asserted that Commonwealth Edison Company (“ComEd”) cannot offer rebates in its BE Plan for passenger EVs or to public and private organizations and companies that install and maintain EV charging infrastructure because the Illinois

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<sup>17</sup> Ameren response to AG 2.01.



266 General Assembly granted the authority to administer these specific types of rebates to  
267 the Illinois Environmental Protection Agency.

268 While we are not lawyers, based on the interpretation set forth by Staff, three of  
269 Ameren's rebate program may also violate the Act. These programs are rebates to  
270 participating education facilities and transit facilities for installation of Level 2 or Level 3  
271 chargers, and rebates to purchase passenger EVs pursuant to its Driver Education  
272 program. To the extent that these programs may be unlawful, we understand those legal  
273 issues will be discussed in briefing.

274 **Q. Aside from the legal issues, do you have any concerns with any of the rebates**  
275 **implicated by Staff's motion?**

276 A. Ameren's Driver Education program has a higher percent of the proposed total budget  
277 (2.5 percent) compared to the proposed spend figures for the Transit Facility (0.5  
278 percent), Corridor Facility (1.5 percent), LI spend in the Non-Corridor Facility (0.9  
279 percent), Private Fleet Facility (1.6 percent), and Local Government Facility (2.0 percent)  
280 programs, yet may impact a smaller portion of Ameren's customers.<sup>18</sup> While we support  
281 EV education as part of driver education curriculum, this can occur without driving an  
282 EV and does not necessitate rebates for new vehicles. Further, Ameren does not  
283 demonstrate that the proposed cost of offering a rebate for an EV that will be solely used  
284 for driver education will be justified when other Ameren programs will help to enable the  
285 electrification of school buses, public transit, or other means of transportation that may  
286 reach a larger portion of the population and have a greater effect on air quality.

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<sup>18</sup> Ameren response to JP 2.04 Attachment.

287 Within its BE Plan, Ameren proposed to spend \$150,000 on vehicle rebates for driver  
288 education programs in 2024.<sup>19</sup> This is less than the proposed planned budget for the  
289 Transit Facility program and close to the LI rebate budget for the Education Facility  
290 program in 2024. More impact could be achieved if the vehicle rebates were used to  
291 increase funding to promote school bus and Transit Facility electrification.

292 **Q. What is your recommendation?**

293 A. We recommend that the Commission reject Ameren's proposal to provide vehicle rebates  
294 and only approve the portion of the Driver Education program pertaining to the support  
295 of in-classroom education.

296 **Rebates – Prudency of Rebates for Residential Charging**

297 **Q. Do you have any others concerns with Ameren's new rebates?**

298 A. Yes. We have concerns regarding the prudency of offering residential customers a rebate  
299 to cover the costs of installing a Level 2 charger.

300 The Company has not justified the need for these rebates. It has not identified how many  
301 equity investment eligible or LI customers own an EV and therefore would benefit from  
302 this offering and has not conducted any analysis to determine if the upfront cost of Level  
303 2 charging is the main barrier preventing LI customers from purchasing an EV.<sup>20</sup>  
304 Furthermore, Ameren has not conducted any outreach to determine whether LI customers  
305 are interested in, or willing to pay, for the cost of a Level 2 charger and does not address  
306 the fact that electrical upgrade costs can increase the total cost of installation to upwards

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<sup>19</sup> *Id.*

<sup>20</sup> Ameren response to AG 3.02(a)–(d).

307 of \$4,500.<sup>21</sup> While Level 1 is the slowest method of charging, it is sufficient for drivers  
308 who charge overnight and travel 30-40 miles per day and Ameren has not indicated  
309 otherwise within its testimony.<sup>22</sup> Thus, the Company's proposal to offer residential  
310 customers up to \$1,500 to install Level 2 chargers is inappropriate.

311 **Customer Protections – Participation Limits**

312 **Q. Does Ameren include participation caps as part of its proposals to protect customers**  
313 **from cost overruns?**

314 A. No. While the Company's plan assumes a forecasted level of participation, and associated  
315 annual budgets, there does not appear to be a participation cap for any of the programs. In  
316 cases where an existing program has a participation cap, Ameren's proposal is to remove  
317 it.<sup>23</sup> The Company would reconcile additional spending over its forecast on a yearly  
318 basis.<sup>24</sup>

319 **Q. What is Ameren's rationale for removing participation caps?**

320 A. Ameren states that the removal of program limits will "reduce barriers of EV adoption"  
321 by ensuring ratepayer funds are available when and if needed by prospective sites. It  
322 maintains that this allows for entities to plan well into the future with the certainty that  
323 program funding will be available when they wish to enroll. The Company also discusses  
324 the benefit of ensuring EVs charge at beneficial times through enrollment in its rate  
325 designs.<sup>25</sup>

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<sup>21</sup> Kelley Blue Book. An EV Charger Buying Guide: See All Your Options. Available at: <https://www.kbb.com/car-advice/ev-charger-buying-guide/>. Accessed on 9/14/22.

<sup>22</sup> Drive Clean CA. Available at: <https://driveclean.ca.gov/electric-car-charging>. Accessed on 9/14/22.

<sup>23</sup> Ameren Ex. 2.1 at 34.

<sup>24</sup> Ameren Ex. 3.0 at 12:239–244.

<sup>25</sup> Ameren Ex. 2.0 at 20:439–443.

**Q. Does Ameren propose any cap on program spending?**

A. Based on our review of the BE Plan and discovery responses, there does not appear to be a spending cap. However, it is our understanding that the Company does not intend to spend above the annual statutory limit of 1 percent of the delivery services revenue requirement, or \$10.1 million as of the latest Commission approved revenue requirement according to the Company.<sup>26</sup> This \$10.1 million limit is much larger than the Company's annual average budget of \$4.2 million.<sup>27</sup>

**Q. Please explain your concerns with the elimination of program participation caps.**

Ameren's proposed budget before the Commission includes cost-benefit analyses assuming average annual spending of \$4.2 million,<sup>28</sup> less than half the statutory cap of \$10.1 million. If participation is greater than anticipated, it appears the Company could spend up to the statutory cap without any requirement to request permission from the Commission, which could substantially alter the program from what is presented in Ameren's BE plan. Within its BE Plan, the Company only provides financial and cost-effectiveness analyses based on expected enrollment in the program, not expenditures above, and up to, the statutory cap. Thus, a process is needed to ensure any additional spending is reasonable and necessary to achieve program goals.

**Q. What is your recommendation to improve customer protections related to the removal of participation caps?**

<sup>26</sup> Ameren Ex. 3.0 at 13:268–271. If the Company seeks to spend above the statutory limit if participation levels are exceeded, it should make this clear in rebuttal testimony.

<sup>27</sup> Includes bill and delivery credits, averaged over 4 years. Ameren Ex. 4.0 "Cottrell\_Workpaper (Benefit-Cost Analysis)\_Corrected, tab "BE Plan Tables," Table 4.

<sup>28</sup> This figure includes bill and delivery credits. Ameren Ex. 4.0 "Cottrell\_Workpaper (Benefit-Cost Analysis)\_Corrected, tab "BE Plan Tables," Table 4.

345 A. We appreciate Ameren's proposal to encourage greater participation in its BE Plan  
346 offerings. However, it is important that the Company demonstrate prudent management  
347 of its authorized budget and not be permitted to increase spending up to the statutory cap  
348 without Commission review.

349 For this reason, we recommend that Ameren's proposal not to incorporate participation  
350 and budgetary program limits be denied. Instead, Ameren should be required to notify the  
351 Commission and other parties to this proceeding if it anticipates exceeding its proposed  
352 annual BE Plan budget.<sup>29</sup> If during a given program year, Ameren anticipates spending  
353 more than its proposed annual budget, it must file a request to the Commission for  
354 approval. Any such request should include the expected expenditures and rationale for  
355 increased expenditures, a description and analysis of program implementation to-date,  
356 and an updated cost-effectiveness analysis.

357 **Customer Protections – Individual Program Budgets**

358 **Q. What is Ameren's proposal as it relates to shifting program funds between Low**  
359 **Income and non-Low-Income sub-programs?**

360 A. This is unclear. However, discovery responses indicate that Ameren seeks flexibility to  
361 shift funding between various programs, up to the annual cap imposed by the Act.<sup>30</sup>  
362 Depending on demand for the program by income, this means non-LI customers could

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<sup>29</sup> As presented in Ameren Ex 4.0 – Cottrell\_Workpaper (Benefit-Cost Analysis), Tab "BE Plan Tables," Table 4. The totals for the years are: 2022 - \$1,570,396, 2023 - \$5,121,162, and 2024 - \$8,236,737.

<sup>30</sup> Ameren response to CNS 1.01. The Company states "There is no limit to the number of Multifamily Facilities outside of low-income or moderate-income areas that can participate in the Multifamily Facility charging program. Likewise, there is no limit to the number of Multifamily Facilities inside of low-income or moderate-income areas that can participate." Given that Ameren cannot spend above the statutory cap, program funds may therefore be exhausted by the non-LI segment.

363 potentially receive all available funds in a given program year to the detriment of LI  
364 participants.

365 **Q. Is it reasonable to allow the Company complete program flexibility, as it relates to**  
366 **LI and non-LI participation and funding?**

367 A. No. LI customers and communities face the largest barriers to EV adoption. Incremental  
368 EV adoption is crucial to program impact and the State’s success in achieving widespread  
369 electrification goals. These LI customers are also much less likely to be free riders, which  
370 increases the efficacy and cost-effectiveness of ratepayer subsidies. Further, the Act  
371 specifically states utility programs should enable “low-income and environmental justice  
372 communities”<sup>31</sup> to access EV ownership and “support at least a 40% investment of make-  
373 ready infrastructure incentives to facilitate the rapid deployment of charging equipment  
374 in or serving environmental justice, low-income, and eligible communities.”<sup>32</sup> The  
375 Commission must ensure these provisions are met when programs are implemented.

376 **Q. What is your recommendation?**

377 A. The Commission should not permit shifting of program budgets between LI and non-LI  
378 subprograms to ensure statutory and programmatic goals are achieved. If extenuating  
379 circumstances are encountered by Ameren, the Commission should allow an annual  
380 process to enable the Company to request a certain percentage of budget shifting up to 25  
381 percent from the pre-approved amount, the threshold proposed by ComEd in its BE Plan

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<sup>31</sup> 20 ILCS 627/45(a)(7).

<sup>32</sup> *Id.* at 627/45(d)(3).

382 filed in ICC Docket Nos. 22-0432 & 22-0442 (Consol.) (though only for informational  
383 purposes).<sup>33</sup>

384 **Modifications to the Customer Fleet Assessment Program**

385 **Q. Please describe Ameren's proposed Customer Fleet Assessment program.**

386 A. Ameren is proposing to provide fleet assessments to education, transit, and private fleet  
387 facilities at no upfront cost. The purpose of the fleet assessment is to provide fleet  
388 managers with the tools and information needed to determine if there is a business case to  
389 pursue vehicle electrification. This includes analyzing the customers' existing fleet,  
390 identifying potential EV equivalent vehicles and infrastructure needs, cost of ownership,  
391 and potential emissions reductions.<sup>34</sup>

392 **Q. What are your concerns with this proposal?**

393 A. Our main concern with this program is the lack of any cost-sharing requirements for  
394 private fleet facilities. There are no provisions with the proposed program that would  
395 ensure ratepayer dollars are not spent on fleet operators that are not committed to moving  
396 forward with electrification. This is of particular importance for private fleets where  
397 ratepayers are providing subsidies to private corporations.

398 **Q. What is your recommended modification to this program?**

399 We recommend a cost-share requirement of 10 percent of the cost of the fleet assessment  
400 for private fleets. Under this proposal, the customer would pay 10 percent of the fleet

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<sup>33</sup> *Commonwealth Edison Co., Petition for Approval of Beneficial Electrification Plan under the Electric Vehicle Act, 20 ILCS 627/45 and New EV Charging Delivery Classes under the Public Utilities Act, Article IX & Investigation into Commonwealth Edison Company Beneficial Electrification Plan Filing pursuant to 20 ILCS 627/45, ICC Docket Nos. 22-0432 & 22-0442 (Consol.), ComEd Ex. 1.01 at 33 (July 1, 2022).*

<sup>34</sup> Ameren Ex. 2.0 at 25:538–26:558.

401 assessment cost upfront and would be refunded only if they choose to move forward with  
402 fleet electrification within 12 months. A similar approach was recently proposed by  
403 Baltimore Gas and Electric Company, Potomac Electric Power Company, and Delmarva  
404 Power and Light Company as part of their EV program portfolios in Maryland.<sup>35</sup>

405 This approach is beneficial in two ways. First it helps deter customers that are not serious  
406 about electrification. Second, it creates an incentive for the customer to move forward  
407 with electrifying their fleets. This will help to ensure that ratepayer dollars are spent in a  
408 manner that results in the actual electrification of fleets.

409 **Q. Do you have other recommendations related to fleet electrification?**

410 A. Yes. Many utilities across the country have developed online fleet calculator websites  
411 that provide fleet operators with initial education and cost estimates on electrification.<sup>36</sup>  
412 These tools allow fleet operators to learn about the available EVs in the market and  
413 required charging infrastructure. The online tools also allow for fleet operators to enter  
414 basic information to determine an estimated total cost of ownership over the life of the  
415 EVs. This tool can provide initial information to fleet operators to determine if moving  
416 forward with a full fleet assessment makes sense for their operation.

417 **VI. AMEREN'S BENEFIT-COST ANALYSIS OVERSTATES THE BENEFITS OF**  
418 **ITS PLAN**

419 **Q. Did Ameren conduct a cost-benefit analysis of its proposed program?**

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<sup>35</sup> PC44 Fleet Subgroup Summary Report. June 30, 2022. Case No. 9478 (ML# 241277).

<sup>36</sup> Examples include Pacific Gas and Electric Company, Duke Energy, Southern California Edison, and Potomac Electric Power Company.



420 A. Yes. Ameren conducted a Total Resource Cost (“TRC”) test and Ratepayer Impact  
421 Measure (“RIM”) test for its proposed program.<sup>37</sup>

422 **Q. Do you have any concerns about Ameren’s cost-benefit analysis?**

423 A. Yes. While we did not do an in-depth analysis of all of Ameren’s modelling assumptions,  
424 we note that the Company assumes that 100 percent of EV adoption by program  
425 participants is due to its programs. Put another way, many participants in Ameren’s  
426 program would have bought or leased their EV without the additional subsidy offered by  
427 Ameren, so in those cases it would be incorrect to attribute the benefits of the EV to the  
428 utility program. As described below, this is an unrealistic assumption.

429 **Q. Is this assumption a large driver of estimated program benefits?**

430 A. Yes. EV adoption drives almost all program benefits for both the TRC and RIM tests.  
431 This assumption is thus a significant driver of BCA results.

432 **Q. Are there any program benefits not driven by incremental EV adoption?**

433 A. The only benefit not driven by EV adoption is avoided capacity and T&D benefits due to  
434 greater off-peak charging encouraged by Ameren’s rate designs. This benefit is less than  
435 \$169,000 through 2050 compared to total RIM test benefits of around \$129 million.<sup>38</sup>

436 **Q. Is it a realistic assumption that all program participants will adopt an EV due to**  
437 **Ameren’s programs?**

438 No. This relates to the existence of free ridership. Free ridership entails participants that  
439 would have adopted an EV or invested in charging infrastructure even without the

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<sup>37</sup> See Ameren Ex. 4.0. The workpapers also provide results for a Participant Cost Test.

<sup>38</sup> Ameren Ex. 4.0 – Cottrell\_Workpaper (Benefit-Cost Analysis)\_Corrected. Tabs “Analysis” and BE Plan Tables. Sum of all values for “Decreased Generation Capacity Cost + T&D.”

440 existence of the program or incentive. The impact of free ridership is commonly studied  
441 as part of energy efficiency evaluations. Utility energy efficiency programs undergo  
442 independent third-party evaluations to determine net-to-gross (“NTG”) ratios that  
443 measure the portion of participation that would not have occurred but for the programs.  
444 This ratio is applied to energy savings to determine what portion of those savings can be  
445 directly attributable to the utility program, often referred to as net savings.<sup>39</sup> Like  
446 customer adoption of energy efficiency measures, EV adoption is driven by a number of  
447 factors beyond the presence of charging stations or vehicle subsidies, including  
448 individual’s environmental consciousness, saving money on ongoing fuel costs, vehicle  
449 performance, vehicle availability, and technology considerations.<sup>40</sup>

450 **Q. Are you aware of an estimate for the percentage of EV adoption benefits that can**  
451 **reasonably be attributed to utility incentive programs?**

452 A. No. While we are certain that a more accurate estimate is likely much less than 100  
453 percent, we are not aware of a robust study to estimate free ridership related to utility  
454 incentives for EV infrastructure. That said, a study of free ridership rates for a  
455 Massachusetts vehicle rebate program found that, on average, around 50 percent of  
456 participants were free riders.<sup>41</sup>

457 **Q. Do you believe that Ameren’s programs should be rejected due to this significant**  
458 **program and modeling uncertainty?**

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<sup>39</sup> National Renewable Laboratory (“NREL”). 2014. *The Uniform Methods Project: Methods for Determining Energy Efficiency Savings for Specific Measure. Chapter 17. Estimating Net Savings: Common Practices.*

<sup>40</sup> NREL, Mark Singer, *Consumer Views on Plug-in Electric Vehicles*, January 2016, p. 15.

<sup>41</sup> Massachusetts Department of Energy Resources, *Massachusetts Offers Rebates for Electric Vehicles (MOR-EV) Cost-effectiveness Study; 2014-2020 Results Summary*, 2/25/22, p. 17.

459 A. Given that this is the Company's first BE Plan pursuant to the Act, no. However, the  
460 Company's unrealistic assumption points to the importance of evaluating free ridership  
461 and other related issues like incremental emissions reductions due to the program during  
462 and after program implementation so that utility cost-benefit models can incorporate  
463 more reasonable assumptions and programs can be modified to minimize free ridership.  
464 At the same time, the uncertainty in program effectiveness is a reason for the  
465 Commission to approach utility EV programs with some level of caution, including  
466 through requiring spending thresholds and limitations as we discuss above.

467 **VII. COMMUNITY ENGAGEMENT AND CONSULTATION PROGRAM**  
468 **SHOULD BE SUPPORTED**

469 **Q. What is Ameren's proposal for a Community Engagement and Consultation**  
470 **program?**

471 A. The Company proposes \$1.4 million in total funding to "directly assist communities with  
472 their EV/charging development strategies and, in equity investment eligible and/or LI  
473 communities, provide financial assistance toward executing those strategies."<sup>42</sup>

474 **Q. Do you believe a grassroots approach to solving equity issues is appropriate and in**  
475 **the interest of ratepayers?**

476 A. Yes, we do. The needs and problems of specific areas are inherently local, and each  
477 community deserves more than just top-down approaches to ensure equitable distribution  
478 of benefits. For example, communities where car ownership is low will not be able to  
479 capitalize on subsidies for new EV purchases.<sup>43</sup> We have analyzed geographical  
480 approaches to utility programs in California and found they have largely failed to produce

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<sup>42</sup> Ameren Ex. 2.1 at 12, 22.

<sup>43</sup> This is acknowledged by Ameren in its response to BTK 1.01 and 1.02 as an element of this program.

481 tangible outcomes for LI ratepayers and at times have been *inequitable*. For example,  
482 despite years of utility subsidy programs with large set-asides for “disadvantaged  
483 communities,” pilot data from Pacific Gas and Electric’s service territory indicated “most  
484 geographical designations are simply not granular enough to capture site-level  
485 characteristics, and there may be some selection bias for the types of entities willing or  
486 able to apply for EV charging subsidies.”<sup>44</sup> For example, several multi-billion dollar  
487 corporations received higher subsidies simply for being located in a “disadvantaged  
488 community.”<sup>45</sup> The intention of the Act to carve out investment in LI and underserved  
489 communities must be met both by geographical-based subsidy programs, as called for by  
490 the statute, *and* intentional efforts to work with communities using a more granular  
491 assessment of needs to assure that program benefits assist people who would not have  
492 utilized EVs in the absence of the program.

493 **Q. How can the Commission ensure that ratepayer funded programs ensure “equity”**  
494 **as defined in the statute?**

495 A. Program implementation, along with Commission oversight, are critical areas of focus to  
496 promote equity. Ameren must engage in open and consistent dialogue with community  
497 groups to understand needs and implement solutions within budget constraints. There will  
498 also likely be instances where the Company’s EV funding programs cannot solve the  
499 particular transportation issues of a community, in which case ratepayer funding would  
500 be inappropriate.

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<sup>44</sup> A.21-10-010, *Testimony of Eric Borden Addressing Pacific Gas and Electric’s Electric Vehicle Charge 2 Proposal*, 7/12/22, p. 18.

<sup>45</sup> *Id.*

501 **Q. What are your recommendations for ensuring a successful program?**

502 A. Ameren should provide additional and ongoing detail to the Commission about program  
503 implementation, including outreach to community-based organizations. This includes  
504 updates regarding outreach, community organizations that have been met with and  
505 engaged, and the outcomes of stakeholder meetings. This can be implemented through  
506 consistent program reporting, regular workshops with potential LI program participants,  
507 and ongoing participation and independent evaluation by Staff or another third-party  
508 evaluator.

509 **VIII. REPORTING AND EVALUATION IMPROVEMENTS**

510 **Q. How does Ameren propose to provide information about the implementation of its**  
511 **BE Plan?**

512 A. The Company indicates that it will submit a report to the Commission and the General  
513 Assembly by July 1, 2024, and every year thereafter. This report will include a summary  
514 of anonymized demographic and geographic data for all individuals and businesses  
515 awarded subsidies related to the BE Plan to assure equitable distribution of benefits. It  
516 will also include information related to how hiring, contracting, and job training enhance  
517 vendor and employee diversity.<sup>46</sup> In addition to this annual report, the Company states  
518 that it intends to file a report every three years that coincides with the required updates to  
519 the BE Plan.<sup>47</sup> This report must include detailed descriptions of transportation  
520 investments made during the prior plan period, along with investments planned for the  
521 following 24 months.<sup>48</sup>

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<sup>46</sup> Ameren Ex. 2.1 at 32.

<sup>47</sup> Ameren Ex. 1.0 at 20:406–21:432.

<sup>48</sup> 20 ILCS 627/45(f).

522 **Q. Does Ameren propose to continue providing its Rider EVCP annual report included**  
523 **in the tariff?**

524 A. No. The Company proposes to strike the reporting requirement from its Rider EVCP  
525 tariff. Ameren indicates that due to the fact Rider EVCP is an integral part of the BE  
526 Plan, it believes that the annual report required under the tariff should be replaced by the  
527 BE Plan update filing which will occur on July 1, 2024, and every three years  
528 thereafter.<sup>49</sup>

529 **Q. Do you find Ameren's proposed reporting to be adequate?**

530 A. No, we do not. While Ameren plans to comply with the data collection and reporting  
531 requirements of the Act in relation to its collection of demographic and geographic data  
532 for plan participants and vendor and employee diversity, more should be done to increase  
533 transparency and track the investments and resulting benefits of the BE Plan. As  
534 proposed by Ameren, there will be insufficient transparency and data collection to  
535 determine if the Company's plans are achieving the goals set forth in the Act.

536 Currently, Rider EVCP requires the Company to provide a summary of the  
537 implementation, operation, and administration of the provisions of the rider during the  
538 previous calendar year. The report must include the number of, and type of, customers  
539 served; the total delivered energy of customers served by program type, broken down by  
540 charging periods; the estimated number of EVs supported by the program by program  
541 type; the total supplemental line extension credit provided to customers; customer  
542 education expenses summarized by tactic and in total; copies of customer education

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<sup>49</sup> Ameren Ex. 2.1 at 32.

543 marketing materials; and findings from Ameren's evaluation/benchmarking of its  
544 customer education and outreach efforts.<sup>50</sup> Rider EVCP also states that Ameren must  
545 provide in its 2025 report findings from an independent evaluation of the overall program  
546 including an analysis that demonstrates whether Ameren's incremental revenue will  
547 offset estimated costs.<sup>51</sup>

548 Reducing reporting of these critical implementation benchmarks from every year to every  
549 three years substantially reduces transparency and will prevent the Commission and  
550 stakeholders from monitoring the effectiveness of Ameren's plan while it is being  
551 executed. This is especially important in the first few years of the BE Plans when  
552 adjustments may be appropriate. It is also not clear when the Company will report and  
553 track its progress in achieving the other purported benefits of its BE Plan related to  
554 reduced air emissions and off-peak EV charging.

555 **Q. What is your recommendation to improve Ameren's BE Plan reporting?**

556 A. We recommend that Ameren be required to continue its annual reporting requirements  
557 listed in Rider EVCP and include incremental revenue generated by the programs broken  
558 out by program. In addition, the annual report should track additional metrics. The  
559 metrics should include, at a minimum, the following for customers enrolled in Real Time  
560 Pricing, Power Smart Pricing, Rider EVCP, and other tariffs and programs that promote  
561 EV charging off-peak:

- 562 • Average frequency of daily charging.

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<sup>50</sup> Ill. C. C. No. 1, Original Sheet No. 21.008.

<sup>51</sup> *Id.*

- Average length of daily charging.
- Timing of daily charging, including hourly breakdown.
- Comparison of energy use profiles for customers enrolled in program-specific tariff/program to customers not enrolled.

These additional reporting requirements will help to demonstrate the extent to which customers are responding to various program and rate signals. This will also provide data to calculate the benefits resulting from these various price signals.

We also recommend that Ameren report on the estimated avoided air emissions resulting from its BE Plan.

**Q. Does Ameren propose to conduct an evaluation of its BE Plan?**

A. No. The Company does not indicate that it will conduct an evaluation of the tariffs and programs included in its BE Plan.

**Q. What is your recommendation regarding an evaluation of Ameren's BE Plan?**

A. In addition to the annual reporting that the Company should continue to perform, described above, Ameren should develop and propose an evaluation, measurement, and verification ("EM&V") plan. This should include a proposed budget and timeline related to the procurement of an independent, third-party EM&V contractor to assess the performance of Ameren's BE Plan and develop recommendations for plan updates. The contractor should have oversight from Staff.

The EM&V activities should include, at a minimum, verification of the metrics described above; customer surveys to determine the extent to which Ameren's programs increased EV adoption, charging behavior, and awareness of EVs; and net-to-gross evaluations to



585 determine the levels of free ridership by program. These activities will help to provide  
586 important information as to whether the BE Plan is having the intended effect, and if  
587 changes to program design and incentive levels are needed in the future. Ameren should  
588 use this information to update the BCA models filed as part of this BE Plan. This will  
589 provide increased visibility as to whether the projected benefits of the BE Plan are  
590 actually realized and will help to refine inputs for future BE Plan cost-effectiveness filed  
591 with future BE Plan updates.

592 **Q. Does this conclude your testimony?**

593 A. Yes, it does.