

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company)	<u>File No. ER-2022-0337</u>
d/b/a Ameren Missouri's Tariffs to Adjust)	Tracking No. YE-2023-0222
its Revenues for Electric Service)	Tracking No. YE-2023-0227

STAFF RESPONSE TO COMMISSION ORDER

COMES NOW Staff of the Missouri Public Service Commission and for this Staff Response to Commission Order respectfully states as follows:

1. On June 27, 2023 at approximately 2:59 pm the Commission stated in its *Order Directing Response*, that "Staff asked that it be granted additional time to complete any further review of Union Electric Company d/b/a Ameren Missouri's exemplar tariff sheets." In its first ordered paragraph the Commission directed that "Staff shall respond today, June 27, 2023, indicating how long it needs to complete review of Ameren Missouri's exemplar tariff sheets." In its second ordered paragraph the Commission further directed that Staff "Staff shall respond today, June 27, 2023, as to how long it would need to review substitute tariff recalculated for an effective date beyond July 9, 2023."

2. Regarding the directive of the first ordered paragraph, Staff apologizes for any lack of clarity in its *Recommendation and Response to Commission Orders* filed at 1:22 pm on June 27, 2023. To clarify, no further review of the Exemplar tariffs filed by Ameren Missouri on June 26, 2023 is necessary because these tariffs have not been submitted as a compliance tariff submission. In its 1:22 pm filing Staff simply sought to clarify that Ameren Missouri's June 26, 2023 Exemplar tariff submission included 108 tariff sheets that would not change contents with a change in tariff rate effective date.

3. Regarding the directive of the second ordered paragraph, Staff estimates that review of the 18 tariff sheets that bear rate values that are subject to adjustment with a change in tariff sheet effective date to July 9, 2023 and preparation of a Recommendation and

affidavits requires approximately 4 – 8 hours. This comparison will be fairly straightforward to conduct as the relevant rate values are already reflected in Staff’s working copy of the compliance tariff sheet review packet, and may be concluded in less than the stated time frame.

4. If the tariff effective date is extended to a date “beyond July 9, 2023,” then the LPS cap will require recalculation, and further collaboration with Ameren Missouri to develop the compliance rate values reflecting a reasonable proof of revenue based on the stipulated billing determinants, ordered language, and the statutory LPS cap calculated as of a different date. Such a comparison may require a complete business day, and may involve review of 20 tariff sheets and require cross-reference review to the proof of revenue rate values.

5. If Ameren Missouri submits compliance tariff submissions including all 128 sheets, regardless of effective date, more than one business day will be required for Staff’s review.

6. Staff recommends that if the Commission is to effectuate a July 9, 2023 rate increase effective date for Ameren Missouri, it enter an order directing Ameren Missouri to substitute the relevant tariff sheets in its tariff submissions Tracking No. YE-2023-0222 as reflected in the exemplar tariff sheets filed on June 26, 2023 for the following 18 tariff sheets:

- 6th Revised Sheet No. 54 canceling 5th Revised Sheet No. 54
- 4th Revised Sheet No. 54.3 canceling 3rd Revised Sheet No. 54.3
- 4th Revised Sheet No. 54.4 canceling 3rd Revised Sheet No. 54.4
- 2nd Revised Sheet No. 54.7 canceling 1st Revised Sheet No. 54.7
- 2nd Revised Sheet No. 54.10 canceling 1st Revised Sheet No. 54.10
- 2nd Revised Sheet No. 54.13 canceling 1st Revised Sheet No. 54.13
- 6th Revised Sheet No. 55 canceling 5th Revised Sheet No. 55
- 6th Revised Sheet No. 56 canceling 5th Revised Sheet No. 56
- 6th Revised Sheet No. 57 canceling 5th Revised Sheet No. 57
- 7th Revised Sheet No. 58 canceling 6th Revised Sheet No. 58
- 7th Revised Sheet No. 58.1 canceling 6th Revised Sheet No. 58.1
- 7th Revised Sheet No. 59 canceling 6th Revised Sheet No. 59
- 2nd Revised Sheet No. 59.4 canceling 1st Revised Sheet No. 59.4

6th Revised Sheet No. 61 canceling 5th Revised Sheet No. 61
6th Revised Sheet No. 63 canceling 5th Revised Sheet No. 63
3rd Revised Sheet No. 91.19 canceling 2nd Revised Sheet No. 91.19
3rd Revised Sheet No. 91.20 canceling 2nd Revised Sheet No. 91.20
4th Revised Sheet No. 92.3 canceling 3rd Revised Sheet No. 92.3

7. Staff recommends that if the Commission is to effectuate a rate increase effective date other than July 1, 2023, or July 9, 2023, for Ameren Missouri, it enter an order directing Ameren Missouri to substitute the relevant tariff sheets in its tariff submissions

Tracking No. YE-2023-0222 for the following 20 tariff sheets:

6th Revised Sheet No. 54 canceling 5th Revised Sheet No. 54
4th Revised Sheet No. 54.3 canceling 3rd Revised Sheet No. 54.3
4th Revised Sheet No. 54.4 canceling 3rd Revised Sheet No. 54.4
2nd Revised Sheet No. 54.7 canceling 1st Revised Sheet No. 54.7
2nd Revised Sheet No. 54.10 canceling 1st Revised Sheet No. 54.10
2nd Revised Sheet No. 54.13 canceling 1st Revised Sheet No. 54.13
6th Revised Sheet No. 55 canceling 5th Revised Sheet No. 55
6th Revised Sheet No. 56 canceling 5th Revised Sheet No. 56
6th Revised Sheet No. 57 canceling 5th Revised Sheet No. 57
7th Revised Sheet No. 58 canceling 6th Revised Sheet No. 58
7th Revised Sheet No. 58.1 canceling 6th Revised Sheet No. 58.1
7th Revised Sheet No. 59 canceling 6th Revised Sheet No. 59
2nd Revised Sheet No. 59.4 canceling 1st Revised Sheet No. 59.4
6th Revised Sheet No. 61 canceling 5th Revised Sheet No. 61
6th Revised Sheet No. 63 canceling 5th Revised Sheet No. 63
4th Revised Sheet No. 89.4 canceling 3rd Revised Sheet No. 89.4*
3rd Revised Sheet No. 91.19 canceling 2nd Revised Sheet No. 91.19
3rd Revised Sheet No. 91.20 canceling 2nd Revised Sheet No. 91.20
4th Revised Sheet No. 92.3 canceling 3rd Revised Sheet No. 92.3
2nd Revised Sheet No. 158.4 canceling 1st Revised Sheet No. 158.4*

*May not require modification.

WHEREFORE Staff respectfully provides this response to the Commission order of June 27, 2023.

Respectfully submitted,

/s/ Jeffrey A. Keevil

Jeffrey A. Keevil
Deputy Counsel
Missouri Bar No. 33825

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 27th day of June 2023.

/s/ Jeffrey A. Keevil

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Its Revenues for Electric Service) Case No. ER-2022-0337

AFFIDAVIT OF SARAH L.K. LANGE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

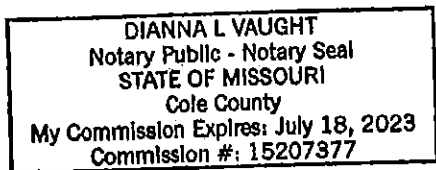
COMES NOW SARAH L.K. LANGE and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Response to Commission Order*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Sarah L.K. Lange
SARAH L.K. LANGE

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 27th day of June, 2023.



Dianna L. Vaught
Notary Public