

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

In the Matter of the Union Electric Company d/b/a        )  
Ameren Missouri's Tariffs to Decrease Its                ) **File No. ER-2019-0335**  
Revenues for Electric Service.                                )

**STATUS REPORT, MOTION FOR CLARIFICATION OF HEARING SCHEDULE,  
ORDER OF OPENING STATEMENTS, AND LIST OF ISSUES,  
ORDER OF WITNESSES, AND ORDER OF CROSS-EXAMINATION**

**COMES NOW** the Staff of the Missouri Public Service Commission on behalf of itself and Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), the Office of the Public Counsel ("OPC"), the Missouri Department of Natural Resources - Division of Energy ("DE"), Missouri Industrial Energy Consumers ("MIEC"), Midwest Energy Consumers Group ("MECG"), Consumers Council of Missouri ("CCM"), the Sierra Club, the Natural Resources Defense Council ("NRDC"), and Renew Missouri Advocates ("Renew Missouri") (collectively, the "Parties"), and hereby submits the following *Status Report, Motion for Clarification of Hearing Schedule, Order of Opening Statements, and List of Issues, Order of Witnesses, and Order of Cross-Examination*:

**STATUS REPORT AND MOTION FOR CLARIFICATION OF HEARING SCHEDULE**

1. Since February 7, 2020, the Parties have engaged in settlement discussions and, as explained in the original *Motion to Modify Procedural Schedule* filed on February 11, 2020 and in the *Motion to Further Modify Procedural Schedule* filed on February 14, 2020, have reached an agreement on revenue requirement and rate design issues, while reserving certain Sierra Club and OPC issues for the evidentiary hearing. The Parties anticipate that a final settlement commemorating the settled issues will be submitted to the Missouri Public Service Commission ("Commission") during the week

of February 24, 2020. The Parties anticipate that, in addition to conduct of the evidentiary hearing on the limited issues that have been reserved, the Commission may request an on-the-record proceeding to discuss the settlement itself.

2. In light of the settled terms and the remaining issues for hearing, the Parties request the Commission modify the procedural schedule in this case as set forth below:<sup>1</sup>

- a. If the Commission desires to conduct an on-the-record proceeding on the settlement, it should be scheduled during the week of March 2, 2020; and
- b. The evidentiary hearing should begin on March 9, 2020.

3. While dates are provided for hearing specific issues below, these dates may be shifted should the evidentiary hearing proceed at a faster pace than anticipated. The Parties anticipate the litigation of one primary issue per day, for four consecutive days. The parties presently anticipate that the hearings can be concluded in four days, but have provided for a possible fifth and final day should the presentation of evidence take longer than anticipated.

4. This motion does not address or request a modification of the testimony dates contained in the February 11, 2020 order from Commissioner Rupp.

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<sup>1</sup> No other changes to the procedural schedule are required.

## ORDER OF OPENING STATEMENTS

5. Opening Statements<sup>2</sup> will be made on March 9, 2020, in the following

order:

Ameren Missouri  
Staff  
DE  
Renew Missouri  
MIEC  
MECG  
CCM  
NRDC  
Sierra Club  
OPC

## LIST OF ISSUES<sup>3</sup> AND ORDER OF WITNESSES

6. Unit Commitments – March 9

- a. Should any disallowance be ordered because of Ameren Missouri's unit commitment practices?

Witnesses:

Avi Allison – Sierra Club  
Lena Mantle - OPC  
Andrew Meyer – Ameren Missouri  
Todd Schatzki – Ameren Missouri  
Shawn Lange – Staff

7. Coal Plants and Long-Term Planning - March 10

- a. Should the Commission refuse to allow recovery of capital costs incurred at the Rush Island, Labadie, and Sioux Energy Centers during the test year or true-up period established for this case?
- b. Should a rigorous economic assessment as outlined in Sierra Club witness Avi Allison's surrebuttal testimony (page 3, lines 14-19) be required apart from the analyses to be submitted by

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<sup>2</sup> Additional, or “mini-opening,” statements may be made at the beginning of each issue at the option of the parties and RLJ.

<sup>3</sup> Reflects only those issues reserved for hearing under the terms of the agreed-upon settlement and that were not otherwise resolved by that settlement.

Ameren Missouri in its 2020 triennial integrated resource planning case?

Witnesses:

Avi Allison – Sierra Club  
Geoff Marke - OPC  
Jim Williams – Ameren Missouri  
Matt Michels – Ameren Missouri  
Shawn Lange – Staff

8. Fuel Adjustment Clause ("FAC") – March 11

- a. What is the appropriate sharing mechanism between the company and customers for costs recovered through the FAC?

Witnesses:

Andrew Meyer – Ameren Missouri  
Lisa Wildhaber - Staff  
Lena M. Mantle – OPC

9. Affiliate Transactions - March 12

- a. Should OPC's recommended disallowance of approximately \$218 million in Ameren Services Company costs be adopted?

Witnesses:

Robert E. Schallenberg – OPC  
Tom Byrne – Ameren Missouri  
John Reed – Ameren Missouri  
Ben Hasse – Ameren Missouri  
Laure Moore – Ameren Missouri  
Mark L. Oligschlaeger – Staff

**ORDER OF CROSS EXAMINATION**

10. Witnesses will be cross-examined in the following order:

Ameren Missouri witnesses for issues in Paragraphs 6 and 7:

Staff  
DE  
MECG  
MIEC  
CCM  
Renew Missouri

NRDC  
OPC  
Sierra Club

Ameren Missouri witnesses for issues in Paragraphs 8 and 9:

Staff  
DE  
Renew Missouri  
NRDC  
Sierra Club  
MECG  
MIEC  
CCM  
OPC

Staff witnesses for issues in Paragraphs 6 and 7:

Ameren Missouri  
DE  
MECG  
MIEC  
CCM  
Renew Missouri  
NRDC  
OPC  
Sierra Club

Staff witnesses for issues in Paragraphs 8 and 9:

Ameren Missouri  
DE  
Renew Missouri  
NRDC  
Sierra Club  
MECG  
MIEC  
CCM  
OPC

Sierra Club witnesses:

OPC  
NRDC  
Renew Missouri  
MECG  
MIEC

CCM  
DE  
Staff  
Ameren Missouri

OPC witnesses:

Sierra Club  
NRDC  
Renew Missouri  
MECG  
MIEC  
CCM  
DE  
Staff  
Ameren Missouri

**WHEREFORE**, Staff prays on behalf of the Parties that the Commission will accept this *Status Report, Motion for Clarification of Hearing Schedule, Order of Opening Statements, and List of Issues, Order of Witnesses, and Order of Cross-Examination*; and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

Jeffrey A. Keevil  
Missouri Bar No. 33825  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 526-4887 (Telephone)  
(573) 751-9285 (Fax)  
Email: [jeff.keevil@psc.mo.gov](mailto:jeff.keevil@psc.mo.gov)

Attorney for the Staff of the  
Missouri Public Service Commission

**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 this 20th day of February, 2020.

**/s/ Jeffrey A. Keevil**