In the Matter of:

UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI'S TARIFFS, etc.

ER-2021-0240; GR-2021-0241, VOL. II

July 20, 2021



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BEFORE THE PUBLIC SERVICE COMMISSION
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                        STATE OF MISSOURI
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 4
                   TRANSCRIPT OF PROCEEDINGS
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 6
                 Discovery Conference via WebEx
 7
                          July 20, 2021
 8
                    Jefferson City, Missouri
9
                             Volume 2
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12
    In The Matter Of Union ) Electric Company d/b/a ) ER-2021-0240
13
    Ameren Missouri's Tariffs )
14
    to Adjust its Revenues for )
    Electric Service
15
16
    In the Matter of Union ) Electric Company d/b/a ) GR-2021-0241
17
    Ameren Missouri's Tariffs )
18
    to Adjust Its Revenues for )
    Natural Gas Service
19
                      MORRIS L. WOODRUFF, Presiding
                          CHIEF REGULATORY LAW JUDGE
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21
    REPORTED BY:
22
    Tracy Taylor, CCR No. 939
    TIGER COURT REPORTING, LLC
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                 JUDGE WOODRUFF: Let's start by taking
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    entries of appearances from the attorneys.
 3
   Mr. Keevil, I understand you're on the line from
    Staff?
 5
                 MR. KEEVIL: Yes, Judge. Representing
 6
    Staff, Jeff Keevil, PO Box 360, Jefferson City,
   Missouri 65102.
 7
 8
                 JUDGE WOODRUFF: Thank you. And
 9
   Mr. Lowery, I see that you're on from Ameren.
    Mr. Lowery, can you hear me? We've got a bunch of
10
11
    call-in users. Is anybody else here from Ameren?
12
                 MR. BANKS: Yes, Your Honor. This is
   Eric Banks, Banks Law, LLC, 1824 Chouteau Avenue,
13
14
    St. Louis, Missouri 63103.
15
                 JUDGE WOODRUFF:
                                  Okay.
16
                 MR. LOWERY: I apologize, Judge. This is
17
    Jim Lowery. Can you hear me now?
18
                 JUDGE WOODRUFF: We can hear you loud and
19
    clear.
20
                 MR. LOWERY:
                              Thank you, Judge.
21
                 JUDGE WOODRUFF: Any other attorneys on
    the line?
22
               There we see you now, Jim.
23
                 MS. MYERS: This is Jamie Myers with
    Staff counsel's office.
24
25
                 JUDGE WOODRUFF: Okay. All right. I see
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1 various other call-in users. I assuming they're not 2 attorneys representing the attorneys or are Staff people or for Ameren who may be called upon later. 3 So let's go ahead and get started. 4 5 start with letting Staff explain their concerns and 6 then we'll give Ameren a chance to respond. 7 MR. KEEVIL: Thank you, Judge. Jeff 8 Keevil for Staff. To begin with, I would say that we 9 have received some responses. The -- as you know, these discovery -- notices of discovery concern have 10 to be filed a previous Friday to the discovery 11 12 conference. And that obviously just requires us to 13 pick a date as of which to file the list of the data 14 15 response -- or data requests which have either not been responded to at all or, in our opinion, have been 16 insufficiently responded to. And we received some 17 responses after filing -- or after at least listing 18 the DRs on this notice of discovery concerns. 19 20 And I can run through those real quickly here. Under the -- if you look at my notice of 21 discovery concerns on the electric case, we received 22 23 responses under 3A to Numbers 587 and 678 through 680 Friday, I believe. And then this morning, less than 24 25 an hour ago, we received a response to 345.

Obviously we don't know if those -- if we 1 2 believe them to be sufficient, but they would -- they 3 have been responded to so they would no longer go under 3A. 5 And then under 3B on my motion here -- or 6 whatever you call this, we've received responses or 7 additional -- I should say additional supplemental 8 responses to 55.1, 89.1, 104.4, 573 through 574, 579, 9 582, 586, 588, 592 we received less than an hour ago. 618, 619 and 648 we've received responses or 10 additional responses to. So those would need to come 11 12 off the list there. And on the gas side of things, we 13 14 received responses to -- under 3A, my understanding is we received responses to both of the DRs listed in A, 15 Number 262 and 311, but 3B still -- still remains, the 16 17 two listed under 3B. So with that said, as far as what our 18 concerns, it's fairly self-explanatory, I think, on 19 20 the sum of them that we have just not received any response to at all. Going back to the electric one --21 the electric case, the DRs in 3B have simply not been 22 23 answered, the remaining 166.1, 240.1, 240.2 and 615. 24 We also have a problem, Judge, on the 25 electric side with -- as you'll see there under 3C,

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there were a bunch of DRs -- several DRs to which
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 2
   Ameren simply indicated they needed until July 30th to
    answer, which was about a 30-day extension. And with
 3
    the discovery -- not discovery, excuse me, the direct
 5
    testimony coming up, we're concerned that if we don't
 6
    get responses to the ones listed in 3C, that we'll
   have some problems.
 7
 8
                 6-- 606 and 613 I believe may be somewhat
 9
    legitimate extension requests on Ameren's part, but we
   need to know when or if they plan to respond. And if
10
    we could get anything sooner than July 30th in
11
12
    response to the ones in 3C, that would certainly be
   beneficial for us.
13
                 I don't know if J Luebbert or Claire
14
    Eubanks, either one of them, is on this line.
15
    were DRs submitted by Ms. Eubanks and Mr. Luebbert.
16
17
    They can probably explain to you the necessity for
18
    those responses better than I could and explain to you
    why they don't believe that the 30-day -- and I can go
19
20
    through them individually, Judge, if you want to, but
    at this point I don't know if you want me to drag
21
    through them individually or not. So what would be
22
23
    your preference?
                 JUDGE WOODRUFF: If Ms. Eubanks and
24
25
   Mr. Luebbert are on the line and can explain more
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about it, that would be helpful about the ones that
1
 2
   need to be done sooner.
                 MS. EUBANKS: Yes, this is Claire
 3
 4
   Eubanks. I am on the line and let me pull these up
5
   real quick.
                 Sorry.
6
                 MR. LUEBBERT: Judge, this is J Luebbert.
7
    I'm on the line as well.
8
                 JUDGE WOODRUFF:
                                  Okay.
9
                 MS. EUBANKS: So the data requests that
    I -- that I asked were 102.1 through 102.4. So the
10
    first one is a public data request and it's simply
11
12
    asking for a spreadsheet to be updated. A similar
    spreadsheet was provided in Staff Data Request 242,
13
   but was only for a portion of the Smart Energy plan
14
   projects. And so we're just asking that a similar
15
16
    spreadsheet be provided that encompasses all the Smart
17
    Energy projects.
18
                 And -- and Data Request 2-- I believe it
   was 242, it did take Ameren 30 days to respond to that
19
20
    specific request, you know. And obviously since a
    good chunk of them have already been done, you know,
21
    it's not even a full -- not even asking for the
22
23
   whole -- whole spreadsheet. Some of the work should
   have already been done already, if that makes sense.
24
                 So then in 102.2, we're simply asking
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for -- let's see, for some project notifications and
1
 2
   project charters for a list of specific projects
    and all of --
 3
 4
                 MR. KEEVIL: I believe -- Judge --
                 MS. EUBANKS: Yeah. Go ahead, Jeff.
 5
                 MR. KEEVIL: I was going to say, Judge, I
 6
 7
   believe on that one and there may be one other one,
    Ameren has claimed it to be unduly burdensome or
8
 9
    overly broad or something of that nature.
    Ms. Eubanks' DR is only requesting 40 projects -- or
10
    the charter for 40 projects out of almost 3,000.
11
12
    she had asked for the entire three -- charters for the
    entire 3,000, they might have an argument that it was
13
14
    overly broad, but asking for only 40, we don't believe
    that to be overly broad.
15
                 And that -- that would also -- that would
16
17
    also apply to DR 102.4. She limited her request to
    40 of the projects. And again, I don't think 40 out
18
    of 3,000 is unduly burdensome or unreasonable.
19
20
                 I would also say, Judge, on 102.4, it was
    unclear to us from what Ameren submitted whether they
21
    were objecting and requesting an extension on 102.4
22
23
    or if they were just objecting flat out and not
    requesting an extension or what. Because they -- in
24
25
    their objection letter or their extension letter, they
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had .1, .2 and .3 listed under extensions and they had
1
 2
    .2, .3 and .4 listed under objection, but they were
    all treated as -- what they filed in EFIS under 102.4
 3
    said, See objection letter. But that was the one
 5
    that -- it didn't say anything about an extension or
 6
    anything.
 7
                 So we're unclear exactly what they were
8
    objecting to and what they were just seeking an
9
    extension on, but that doesn't really address the
    substance of the DR. And like I said, Ms. Eubanks is
10
    limiting her DR to 40 projects out of roughly 3,000
11
12
    and I don't believe that would rise to the level of
13
    overly broad.
14
                 JUDGE WOODRUFF: I assume that's attempt
15
    to make a sampling of the -- of the 3,000?
16
                 MS. EUBANKS: Yes, that's correct.
17
                 JUDGE WOODRUFF: All right. Let's get a
    response from Ameren then as to those 102.1 through 4.
18
19
                 MR. LOWERY: Yeah, Judge. Thank you.
20
    they are correct that the -- so let me back up on
21
    102.1. 102.1 aro-- refers to a spreadsheet from I
22
    think it's 242. And that spreadsheet was provided in
23
    a response on April 20. And Staff didn't ask us any
   more questions about it until June the 17th, I believe
24
25
    it was.
```

1 It took us a lot longer than 30 days, I'm 2 sure, to even do that initial spreadsheet on all that information. We collaborated with Staff before this 3 case was filed and worked out a list of about 130 DRs, as I recall, that they gave us I think in late 5 February, early March and we got started working on 6 7 those. We were trying to avoid that situation where 8 we have this fresh at the beginning. 9 So I don't know how many of that 2,937 rows in that spreadsheet have to be updated, but I'm 10 sure it's a very large number. And we are in the 11 12 process of doing that, but I mean, we're talking thousands of rows in a spreadsheet we've been asked to 13 14 update the in-service dates for those. 15 We may have in-service dates that have 16 changed from what they were given back in April 17 because those projects, as you know, Judge they're in -- they're in process and they're fluid. So as far 18 as I know, if those -- if those in-service dates have 19 20 changed on any of those 2,900 projects, they are updating those dates. 21 22 And so, you know, the Smart Energy plan, 23 Judge, it covers every aspect of the company's capital 24 investment; so fossil generation, Callaway, energy delivery, transmission, IT facilities. It's every 25

capital investment that the company makes is part of 1 2 that Smart Energy plan. So there's a tremendous amount of update that has to be done to answer that 3 4 DR. And you know, they could have asked this 5 6 question any time from April until June 17th. 7 simply can't physically answer it as quickly as maybe 8 they want us to. So we did ask for an extension to 9 June 30th. We intend to have all of these answered -and there's another set that Mr. Keevil referred to --10 by June -- excuse me, I said June 30th -- by 11 12 July 30th. 13 And I know people are working on them. 14 checked on the status of them yesterday. Some of them 15 I would expect we'll have before July 30th, but we 16 just can't physically answer that many different DR --17 that much data in that period of time. Then on 102.2 and 102.4, Mr. Keevil is 18 They're I think the same list of 40 projects. 19 20 But if you look what they're asking for, they're asking for a tremendous amount of information. I was 21 told yesterday when I checked on these, we have 22 23 20 different people are working on getting those responses together. 24 And again, these are all over the 25

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These are not in one area of the company.
1
    company.
 2
    They're all over that six or eight different
    functional areas I discussed that you've got to go and
 3
   pull all of this information, all of these documents,
 5
    all of this data. And it's just not something that
 6
    can physically be done in a 20-day period of time.
 7
                 So you know, I don't -- I don't really
 8
    know what else to say other than we're talking about a
9
    tremendous amount of work, documents, projects,
    information that have to be compiled, collected and
10
    then put in the data request responses over projects
11
12
    in the Smart Energy plan.
                 And you know, the Staff, of course,
13
14
    knew -- they know we have a Smart Energy plan.
    make a filing under the statute every February that
15
   has all of this information. And as I said, on
16
17
   April 20th, we provided the list of the 2,937
   projects. So this is not new information.
18
                 We didn't get the request until two
19
20
    months after they had the spreadsheet. We're doing
    the best we can. I do think we'll make the July 30th
21
    deadline, but we are not going to be able to make it
22
23
    as to most of these before then.
24
                 JUDGE WOODRUFF: Okay. So the -- there
25
   was also concern that -- or confusion expressed by
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Staff as to whether the company was objecting to these
1
 2
   or just was requesting for more time. It sounds like
 3
   you're just requesting more time.
 4
                 MR. LOWERY: We objected to protect
5
    ourselves, because I do think these are extremely
 6
   burdensome and probably overbroad. But we -- I think
 7
   we intend to answer the questions that have been
 8
   asked.
            I don't think -- I don't think the dispute
 9
   here is about the objections. I think the dispute
   here is about the time getting the answers to them,
10
    from my perspective.
11
12
                 JUDGE WOODRUFF: Okay. Staff have any
13
   response to that?
                 MR. KEEVIL: Well, I think he responded
14
15
   primarily to 102.1. The .2 and .4, again, you're
    talking 40 projects. I don't see how it would take a
16
17
    30-day extension for both.
                 But if you look at 102.3, changing DRs on
18
    you here slightly, but it's one of the four we've been
19
20
    talking about. That one simply asks for clarification
    about their plans. It is confidential so I'm not
21
    going to read it out loud, but the -- as I said, it
22
    simply asks for clarification about certain plans,
23
    basically two parts. And again, I mean it doesn't
24
25
    seem to us that that should take a 30-day extension.
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Keep in mind, Judge, if they got these on
1
 2
    June 17th, that means they were due June 27th and that
   means that when they asked till July 30th to answer,
 3
    that's actually over a 30-day extension.
    32 days, 33 days, whatever. So it just seems like
 5
 6
    they're being a little -- asking for more than they
 7
   need to provide clarification of plans.
 8
                 MR. LOWERY: Judge, first of all,
 9
   Mr. Keevil is off by ten days on his math. It would
   have been due July 7th, not June 27th.
10
11
                 But let's take a look at 102.3. I think
12
    there's 30 or 40 different work orders listed on here.
    I believe that these are what are called blanket work
13
    orders. And so if the projects are under half a
14
   million dollars, you have -- they're collected in
15
16
    these various types -- I don't -- I can't explain it
17
    in great detail, but they're collected in these
    blanket work orders.
18
                 And so you may have -- you may have 30 or
19
20
    40 or 50 projects within each one of these work
    orders. And I don't know the exact number, but it's
21
   multiple. So this is many, many more projects than
22
23
    they -- I think they think they're asking about. And
    they're asking about to the extent to which the work
24
25
    is completed or to be completed on these projects.
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And so I don't -- I don't think this idea
1
 2
    that, oh, it's just a clarification on 50 -- it's not
 3
    50 discrete projects. It's probably many multiples of
 4
    50 discrete projects in 102.3.
5
                 Then in 102.4 -- and 102.4 and 102.2 are
 6
    completely related to each other. They're asking for
 7
    all documents, equipment proposals, equipment bid
 8
   valuation, design specs, purchase order, change
 9
    orders, construction reports, original budget, final
   budget, et cetera. They're asking for all of those
10
    documents about those 40 projects. We're doing the
11
12
   best that we can do, Judge, but that's the best we can
13
    do.
14
                 JUDGE WOODRUFF: Okay. And when is
15
    direct testimony due, Mr. Keevil?
16
                 MR. KEEVIL: I believe it's September
17
    3rd, something like that.
18
                 MR. LOWERY: That's correct.
19
                 MR. KEEVIL: It's very early in -- okay.
20
                 JUDGE WOODRUFF: Okay. Well, I'll
21
    encourage Ameren to get this done as soon as possible.
    I don't know that I can order them to do any faster
22
23
    than they're doing it. It sounds like these are
    fairly complicated DRs.
24
25
                 Staff, do you have anything else you want
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to say about 10 -- the 102 series -- sequence?
1
 2
                 MS. EUBANKS: Judge, if I may, on
    102.3 -- this is Claire Eubanks again.
 3
                 JUDGE WOODRUFF: Is this Ms. Eubanks
 4
 5
    again?
 6
                 MS. EUBANKS:
                               Yes, it is.
 7
                 JUDGE WOODRUFF:
                                  Okay.
                 MS. EUBANKS: So on 102.3, we're really
 8
 9
    asking for an explanation. So I do understand that
    the second part of the data request lists specific
10
   projects, but we're also just asking for an
11
12
    explanation. So we're not -- for that one, they don't
   necessarily need to provide anything in -- and it is
13
14
    quite possible that a lot of the projects could be
15
    discussed together.
16
                 So I just want to make that clear. This
17
    is asking for an explanation of their plan for these
    specific -- for a conversion basically.
18
                 JUDGE WOODRUFF: So you're suggesting a
19
20
   partial response would be --
                 MR. LOWERY: I'll get some information
21
   back -- I do think -- I'm sorry. I do think, Judge,
22
23
    that when I got my list of updates on these, I think
    this might be one that was somewhat advanced in the
24
25
    queue, as opposed to particularly those ones I was
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talking about that were tied together. So I will see
1
 2
    if, you know, maybe 102.3 we can have in just, you
 3
   know, a couple, three days from now. I'll just have
    to check. But I -- I appreciate the clarification.
 5
                 JUDGE WOODRUFF: Okay. Let's move onto
    605, 606, 608 through 613. Mr. Luebbert, was that
 6
 7
   yours?
 8
                 MR. LUEBBERT: Yeah, that's correct.
                                                       Do
 9
   you want me to just walk through and give kind of a
   high-level explanation of what I'm asking for on
10
    those?
11
12
                 JUDGE WOODRUFF: Yes. I think that would
13
   be helpful.
14
                 MR. LUEBBERT: Okay. So starting with
    605, it's asking for an explanation of the process
15
    that Ameren used to identify distribution system
16
17
   projects for inclusion in the Smart Energy plan.
18
    it goes on to ask for what metrics and weights were
    applied to each metric whenever they were considering
19
20
    those projects.
                 606 asks how Ameren determined that each
21
   project included as part of the Smart Energy plan was
22
23
   necessary to continue to provide safe and reliable
    service.
24
                 608 asks for a description of the
25
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evaluation process for potential Smart Energy projects 1 2 and how that process was developed. And it does go on to request which employees were included in that 3 development of that process and what their responsibilities are. 5 6 609 requests an explanation for the 7 process utilized by Ameren for evaluating potential 8 distribution system projects that were included as 9 part of the Smart Energy plan and if there was a score card that was used, basically providing a sample for 10 each type of project associated with the plan. 11 12 610 asks Ameren to identify projects that passed the evaluation process but were ultimately not 13 14 included in the Smart Energy plan and have an 15 explanation for why they weren't included. 16 611 requests asks if Ameren conducted any 17 project level cost-benefit analysis and then asks for any project level cost-benefit analysis to be 18 provided, as well as supporting documents for any 19 20 assumptions made. 21 612 requests all cost-benefit analysis performed by Ameren regarding the types of projects to 22 23 be included in the Smart Energy plan, as well as supporting documentation. 24

25

And then 613 asks how Ameren determined

```
each project was prudent and provide the supporting
1
 2
   documentation.
                 So some of those -- I guess as kind of a
 3
 4
    summary, some of those are really just asking for an
5
    explanation of the process used and the development of
 6
    the process. There's a couple of those in there
    that's asking for, you know, a project level
 7
 8
    cost-benefit analysis and a lot of supporting
 9
    documentation. And I do recognize that a couple of
    those would have quite a bit of, you know, supporting
10
    documentation that would need to be gathered.
11
12
                 JUDGE WOODRUFF: Okay. Now, is Ameren
13
    objecting to these or is this just another requesting
    more time to respond? We can't hear you, Mr. Lowery.
14
15
                 MR. LOWERY: I think the issue is the
16
    time, Judge. I don't think we're fighting about
17
    objections over these. We intend to answer them.
                 JUDGE WOODRUFF: And this will also be
18
    July 30th?
19
                 MR. LOWERY: That's correct. So Judge,
20
   you know, all these came in on the same day, including
21
    the ones from Ms. Eubanks. Ms. Eubanks, at least hers
22
23
   were keyed off a spreadsheet she didn't get until
   April 20th so I guess she didn't have it when the case
24
   was filed.
25
```

1 But there's not a single question that's 2 asked in this series starting with 605 and 613 -there's not a single one of those questions that 3 couldn't have been asked the day the case was filed. 5 So you know, the fact that I think Staff is concerned about not getting the answers until late July and 6 7 their testimony is due five weeks later is partly of 8 their own -- that's partly a situation of their own 9 making. But regardless of that, you know, let's 10 take 605. Every -- distribution projects and there's 11 12 a lot of questions about metrics and weights and how you make decisions, et cetera. We have -- you know, 13 we have however many it is, six or eight different 14 districts across the entire state. You've got 15 different sub-categories, you've got underground, 16 17 overhead, you've got grid resiliency, grid modernization. You've got all kinds of different 18 categories. And the answers to those questions are 19 20 not necessarily the same for all those categories. So it's a very broad question asking for, 21 you know, keep -- and, you know, the distribution 22 system projects, that's probably -- in terms of 23 24 number, that's probably the single largest number of 25 that 2,900 that we're talking about.

1 Then you go onto 606. Now we're asking 2 questions about every single project in the Smart Energy plan. That's that 2,976 projects. How did we 3 determine each project was -- was, you know, needed 5 for safe and reliable service? So we're at a project level on that one. 6 7 We're at 608. Again, it's fully describe 8 the evaluation process for the entire Smart Energy 9 plan. So now we're back over across generation, transmission, energy delivery, you know, fossil and 10 Callaway generation, IT facilities, it's across the 11 12 entire capital budget at Ameren Missouri that they're asking about. And that's really true of all of the 13 14 rest of these. 15 And so again, we've been asked -basically what they've done is I think they've started 16 17 in earnest auditing the Smart Energy plan projects but 18 they didn't start until June 17th. You've also got all the same people, you know, across these various 19 20 functions -- a lot of the same people are involved in having to answer all of these data requests; both Ms. 21 Eubanks' and Mr. Luebbert's. 22 23 So again, we are doing the best we can. 24 We will try to get some of them before literally 25 July 30th, but we -- we just can't answer this level

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of detail about this many projects across this many
1
 2
   areas of the company in the time that they would
 3
   prefer that we answer them.
                 JUDGE WOODRUFF: And again, your response
5
    is you promised responses by July 30?
6
                 MR. LOWERY: Yes. And as far as I
 7
   know -- and I did check on this. I believe we -- I
8
   think we believe that we will be able to make that
9
    date. And I'm sure some of them will be sooner than
    that. But I don't think we intend to miss that date.
10
    I can't absolutely promise that, of course.
11
12
   happen. But that's -- based on the status report I
   was given, I think they believe they can make that --
13
14
   meet that date.
15
                 JUDGE WOODRUFF:
                                  Okay. Mr. Luebbert,
16
   were there any partial responses that would be helpful
17
    to you that might be -- that Ameren might be able to
   provide before July 30th?
18
                 MR. LUEBBERT:
                                Yeah. I mentioned before
19
20
    that there was -- there were a couple in there that --
    that I recognized were going to have guite a bit of
21
    information that would need to be gathered.
22
23
    specifically I think, you know, 613 and 606 are
24
    requesting, you know, supporting documentation and any
25
    support for any assumptions made in that process.
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```
1
                 The others are really asking for
 2
    information that -- that Ameren would have utilized in
    their evaluation of the plans. And my assumption was
 3
    that -- well, I guess I shouldn't assume, but I
 5
    think -- a lot of the information that's requested in
 6
    the others I think could at least be partially
 7
    responded to if not in full. And you know, if -- if
 8
    it was necessary to supplement with -- with something
 9
    as it came up, I think that would be fine for me.
10
                 JUDGE WOODRUFF: Mr. Lowery, any response
    to that?
11
12
                 MR. LOWERY: I mean Judge, I probably
    can't speak intelligently about what Mr. Luebbert was
13
14
    or was not assuming and whether his assumptions were
15
   valid.
16
                 JUDGE WOODRUFF: I wouldn't really expect
17
   you to. But what I'm looking at from you is, is
    there -- can Ameren possibly just do some partial
18
    responses before the 30th?
19
20
                 MR. LOWERY: What -- what I can commit to
    do, Judge, is obviously I will go back and relay what
21
    Mr. Luebbert said and ask that question. And if it
22
23
    can be done, I'm sure we will.
24
                 JUDGE WOODRUFF: Okay. Thank you.
25
                 Let's move back up then to subsection B
```

```
of Staff's request on the electric side. There were
1
 2
    some DRs that were apparently overdue and apparently
 3
   responses came in for most of them today, but we still
   have 166.1, 240.1, 240.2 and 615 apparently have not
5
   been responded to. Mr. Lowery, do you have any
6
   response on those?
 7
                 MR. LOWERY: Judge, I thought 615 had
8
   been, but -- so I will check on it, but I thought it
9
   had been. But if it wasn't, I will -- we'll do our
   best to get it as quickly as we can.
10
11
                 166.1, the person who had to answer that
12
    unfortunately went on -- and I think that person is
   back tomorrow, but went on a vacation I think over the
13
14
    4th of July, kind of a little bit of an extended one.
15
    The person just simply hasn't been here. So I'm going
16
    to get with that person when they get back tomorrow
17
    and do our best to expedite the response. I agree.
    We're late, I'm sorry and I'm going to try to move as
18
19
    quick as we can.
20
                 240.1 and 240.2. The person that those
   were initially assigned to was the right person, but
21
    that person retired unbeknownst to us at the end of
22
23
    July and we didn't realize it for a few days and it
24
    just got reassigned. So we will try to get those as
25
    quick as we can, but that's what happened with that.
```

```
MR. KEEVIL: They didn't realize someone
1
 2
   had resigned?
                 MR. LOWERY: We didn't, Jeff. We assign
 3
 4
    them and nobody let us know the person retired.
 5
    they just got left -- they got caught, you know, in
    sort of LaLa land, unfortunately. It was a mistake.
 6
 7
    I don't really know what else to say.
                 JUDGE WOODRUFF: All right. Mr. Keevil,
 8
 9
    anything you wanted to respond to on that?
10
                 MR. KEEVIL: Is there anything I want
    to -- well, I suppose yeah, lots of things I'd like to
11
12
    respond to on that, but I better not. It sounded to
    me like they're -- Mr. Lowery admits they're late on
13
14
    them and they plan to answer them.
15
                 But I mean, you know, here we are, Judge
16
    one guy went on vacation, another guy res-- somehow
17
    surreptitiously resigned. I don't know -- we also had
    a problem with their IT system re-- being reconfigured
18
    or something during the rate case. I don't know what
19
20
    to say. I mean we -- we obviously need the
    information as soon as we can. They're overdue.
21
    don't know what else really that I can say.
22
23
                 JUDGE WOODRUFF: And there's really not a
    whole lot else I can say too other than to encourage
24
25
   Ameren to respond as quickly as possible. And they
```

```
1
    admit that they will, so.
 2
                 MR. LOWERY: Judge, on the case side
    there's a 222.1, which I think is exactly the same DR
 3
   as 166.1 on the electric side so it's the same
 5
    information there. And one other one, 99.1 on the gas
 6
    side, and I expect they'll have the answer to that
 7
    today or tomorrow. And I think that's all of the late
 8
    ones.
 9
                 JUDGE WOODRUFF: Okay.
                 MR. KEEVIL: You want to go to the
10
    insufficient response ones then in 3A, Judge?
11
12
                 JUDGE WOODRUFF: Yes. Let's go off to
    those. How were the responses insufficient?
13
                 MR. KEEVIL: Yeah. Several of these were
14
    rate design related, class cost-of-service. I don't
15
16
    know if Ms. Lange is on the line or not. Sarah, are
17
   you there?
18
                 MS. LANGE: Yes.
                 MR. KEEVIL: There she is. You want to
19
20
    walk through the ones that are yours and explain why
    they're -- number one, why they're relevant; and
21
   number two, why we need them as soon as we can?
22
23
                 MS. LANGE:
                             I am working from a different
    list than you are, so if you can tell me what number
24
25
    to start, I can proceed from there.
```

MR. KEEVIL: Let's see. 105.2. 1 2 MS. LANGE: Okay. So 105.2, meter asset Okay. So we did get a partial response to that 3 ID. that gave some information for AIM meters. We don't have that information for the AMR meters. 5 I understand that if they can't relate 6 7 the AMR property back to, you know, each specific 8 vintage, each specific asset ID, I understand that. 9 But if they are currently retiring these meters, I would sure hope that someone in their company knows 10 what retirement units they're getting retired to in 11 12 general. So I mean, if we can just get the 13 14 property type, the retirement unit name, that will 15 suffice. I thought I made that clear on a prior call with some technical folks, but you know, we just need 16 17 really basic information about when a model number becomes a retirement unit, what retirement unit does 18 that model number go to. And we understand that a 19 20 model number might go -- or that one retirement unit might contain many model numbers, but it shouldn't 21 work the other way. 22 23 MR. KEEVIL: And they to have something in order to do the retirements; otherwise, they're 24 25 leaving the property on the books until after it's

```
retired. Correct?
1
 2
                 MS. LANGE: That would be a concern that
    this would raise on the accounting side. At this
 3
   point I'm not pursuing that particular concern. At
5
    this point I'm just simply looking to tie dollars of
   meter to customers. But at this -- you know, it does
6
 7
   raise questions as to whether or not they're able to
8
   retire these meters properly if they really can't tell
9
   us what model number goes with what retirement units.
                 MR. LOWERY: Judge, pardon me, if I can
10
   break in here. I do have Tom Hickman who did the
11
12
    class cost-of-service for Ameren Missouri and I think
    is the technical person, our -- the counterpart.
13
14
    don't know if you want Ms. Lange to go through however
15
   many of these she has or you want to take these one at
16
   a time, but I just want to let you know that I'm going
17
    to have him address those items, however you want to
18
   do it.
                 JUDGE WOODRUFF: I think it would
19
20
   probably be easier doing it one at a time.
   Mr. Hickman, are you on?
21
22
                 MR. HICKMAN: Yes, I am, Judge.
23
                 JUDGE WOODRUFF: Go ahead and respond.
24
                 MR. HICKMAN:
                               Okay. On this one
25
    specifically, this was a mistake on my part.
                                                  The
```

```
reference that was made in the DR, I think I got
1
 2
    crisscrossed on DR numbers. But since then, since
    this -- this was brought to my attention, I've looked
 3
   back and understand the complete listing that is being
    requested and I have internal requests to get that
 5
 6
    information pulled.
 7
                 I don't think it's going to be a problem
 8
    and on this one I expect to submit a supplemental
 9
    response that would include that information probably
   hopefully today or tomorrow. But it's subject to
10
    other working groups pulling that information.
11
12
                 JUDGE WOODRUFF: Okay. And then
    Ms. Lange if you want to move onto the next one.
13
14
                 MS. LANGE:
                             Sure. Mr. Keevil, would you
   mind letting me know what number is next?
15
16
                 JUDGE WOODRUFF: We're not hearing you,
17
   Mr. Keevil, if you're speaking.
18
                 MR. KEEVIL: Yeah. I always get
    caught -- at least at one point during a call every
19
20
    call I get stuck with mute being on. I apologize.
                 I believe Ms. Lange's next one listed is
21
    487. And then I would also say that you've got 487,
22
23
    489 and 492 all in a row there.
24
                 JUDGE WOODRUFF: Okay.
25
                 MS. LANGE: Sure. So 487 is -- there was
```

```
a 20 -- almost 25 million -- 24-something million
1
 2
   ununitized amount with a vintage 2020. I asked what
    is it. It was in the AMI meter account. And the
 3
    response we received is well, they're AMI meters.
5
                 So I -- you know, I get it.
6
   nonunitized for a reason, but now we're seven months
 7
   past the end of 2020. So one, I would hope that by
   now that's been unitized; and two, you know, how many,
8
 9
   you know? Is it 50 really big meters? Is it 100,000
    smaller meters? You know, if -- if you don't have --
10
    if you don't have the model numbers, I get it.
11
12
                 But then again, there's only about seven
   models that are being deployed so I would sure hope
13
    that for 25 million dollars we can just get some
14
    indication of if it's, you know, 1,000 meters,
15
    100 meters, 100,000 meters. You know, something --
16
    any information is better than none.
17
18
                 JUDGE WOODRUFF: Response from Ameren?
                 MR. LOWERY: Yeah, Judge. I mean I think
19
20
    we've -- I think we've answered the question we were
    asked. But I think we now understand -- and I think
21
    that we talked about this yesterday. We thought --
22
23
    since it ended up on the discovery list.
                 I think if this -- if what she wants to
24
   know is the number of meters and so on, I think we can
25
```

```
supplement that. But I do think we asked -- answered
1
 2
    the question that was asked of us, just to be clear.
    But I think we can supplement the DR now that we
 3
    understand what she's looking for.
5
                 JUDGE WOODRUFF: Okay. And 489?
                 MS. LANGE: 489 is -- and I get -- we've
 6
 7
   met with Ameren on this. You know, just for
8
    thoroughness, I feel like we have to follow-up with
 9
    the discovery conference. And if they -- if their
   position is what it is, they can put that in a
10
    response instead of just providing it to us orally.
11
12
                 But on this one we're asking about a very
    finite number of very expensive property. Staff --
13
14
    Staff's preference is to assign rather than allocate
15
    whenever we can. And these are some big dollar items.
    And, you know, if there is a four million dollar
16
17
    switch that is in use and the other switches are all a
    couple hundred thousand dollars, if somebody at Ameren
18
    can't say where that four million dollars switch is
19
20
    located, that is concerning.
                 And this is -- these are all items that
21
    are recorded as a retirement unit of one or two.
22
23
    it's -- I think it's 16 items total that are all, you
    know, very high dollar items. We just need to know
24
25
   where they are so we can assign them if possible. And
```

```
if we can't assign them, you know, we just need them
1
 2
    to say in writing that they can't find those items,
    they can't tie to that retirement unit.
 3
 4
                 JUDGE WOODRUFF: All right.
                                              Response
    from Ameren? Mr. Lowery, you're muted.
5
 6
                 MR. LOWERY: My apologies, Judge. I left
 7
    it -- I was unmuted and I muted.
 8
                 I think we think we've answered this
 9
    question as it was asked as well, but -- and I think
   perhaps we had some idea when we realized it was on
10
    the discovery list, but -- and I'll let Mr. Hickman
11
12
    supplement this.
13
                 But I believe we agreed in some
14
    discussions that we initiated with Staff at the last
15
    discovery conference -- as you'll recall, Judge, we
    had some disputes about these class cost-of-service --
16
17
    some of the DRs in the last discovery conference.
18
                 We agreed that we would provide a
    supplement to -- I think it was a different DR that
19
20
    gets into mass property accounting and some of the
    things that we think are causing some of the confusion
21
   here. And I believe that Mr. Hickman thinks that that
22
23
   may address this issue, but -- but -- as opposed to --
    I mean I think we've answered this question, but I
24
    think that supplement we believe may address the issue
25
```

that Ms. Lange just raised. 1 2 Tom, would you, you know, help me out and explain probably a little better than I did what we're 3 thinking here in terms of resolving this one? 4 MR. HICKMAN: Jim, I think what you 5 6 explained is accurate. I think we plan a supplemental 7 response, but I think it's just going to go into 8 further explanation than maybe what the original 9 response did. And I'm working right now with our plan accountants to kind of -- to develop that response and 10 we expect to have that in. 11 12 We have a meeting on it that we're going to have take place tomorrow. So hopefully maybe by 13 the end of the week we would provide a little bit more 14 15 detail on the challenges with this and how mass 16 property creates those challenges. 17 MR. LOWERY: And Judge, I think what we had committed to was to provide that by the end of the 18 So it's not the end of the week yet, but I 19 20 think it will address the issue that we've been talking about here. 21 I didn't recall that from the 22 MS. LANGE: 23 prior conversation. What I had recalled was the discussion would be that we would receive something on 24 the 21st related to the relative system costs is what 25

```
I understood from the other conversation. But yeah,
1
 2
    something by the end of the week, I appreciate it.
    I'll take a look at what you got.
 3
                 JUDGE WOODRUFF: Okay. Were there any
 4
5
    other DRs for Ms. Lange?
 6
                 MR. KEEVIL: Yes. She has 492, Judge,
 7
    and then I think she also as 681.
8
                 JUDGE WOODRUFF: Okay. 492 then.
 9
                 MS. LANGE: 492 we got a res-- I asked
    hey, what -- what property do you have leased?
10
    this may have just been a misunderstanding, but the
11
12
    response I got was here is a list of the leases that
   we -- the revenues we get for the property we have
13
14
    leased, but it didn't actually include an explanation
15
    of what property was leased.
                 MR. LOWERY: So -- so Judge, I think -- I
16
17
    think we probably misinterpreted the question and we
   probably didn't answer it in the way that we should
18
19
   have.
20
                 I can tell you -- well, I think the
21
    answer to the question probably should have been not
    applicable as I understand it because none of -- none
22
    of this property is leased. I think -- I think we
23
    gave her revenue detail and I think she wanted
24
    information on the assets. And my understanding is we
25
```

```
can't probably provide what she's asking for here.
1
 2
   But we will supplement the response and explain all
    that.
 3
                 MS. LANGE: Well, so respectfully, Jim,
 5
    if the answer is we don't lease the whole pole, we
 6
    release -- we lease the right to hang a wire on the
   pole, then I think the right to hang a wire on this
   pole or the right to hang the wire on this stretch of
 8
 9
   poles or whatever is the answer.
10
                 MR. LOWERY: Okay. Well, I think the
   people that are going to supplement are listening so
11
12
   hopefully that will help them provide the answer.
                             I appreciate that.
13
                 MS. LANGE:
                 JUDGE WOODRUFF: Okay. I believe you
14
    said 681 was also Ms. Lange's?
15
                                   This one, I was blown
16
                 MS. LANGE: Yes.
17
    away by the objection. I literally just asked for
18
    each rate schedule at each voltage, how many customers
    do you have by month? Which -- which is about as
19
20
    basic as you can get. So I guess if the company
   misread or misinterpreted what I was after --
21
                 MR. LOWERY:
22
                              Judge, I think we intend to
23
    answer this question and think we'll have an answer
    soon, as in it could be today or tomorrow. But
24
25
   Mr. Hickman, if I'm misstating, please correct me.
```

```
MR. HICKMAN: No. I believe that to be
1
2
   the case.
 3
                 JUDGE WOODRUFF: Okay. Mr. Keevil, then
 4
   we had 301 and 302?
5
                 MR. KEEVIL: We have 301, 302, 337 and
6
    554 that we haven't addressed, Judge. 554 is
7
   actually -- let me take that one because that relates
8
    to -- somewhat to Ms. Lange's group. I believe that
9
   was submitted by Ms. Cox or Ms. Kliethermes, one or
    the other of them.
10
11
                 And my understanding is their objection
12
   or whatever, Ameren claimed that 554 would require
    them to perform analysis or develop data that doesn't
13
14
    already exist. However, my people inform me that as
15
    of -- starting in June of this year, Ameren started
    seasonal proration. so the data should -- should
16
17
    exist at least starting last month. I don't know why
18
    they can't provide, for purposes of the updates, the
    true-up information that they started at least in June
19
20
    of this year if that's the first it started.
                 MR. LOWERY: So Judge -- and under the
21
   process, Staff isn't required to come and talk to us
22
23
   about these before they put them on their list.
24
    I'm not accusing Staff of, you know, doing something
25
   procedurally improper.
```

```
But we made this objection on June 21st.
1
 2
    The person who -- the only person that I know that
    could really address, you know, the assumptions
 3
   Mr. Keevil's making and the -- being implicit as to
5
   what we can or cannot do is Steve Wills and Steve went
6
   on vacation -- he's on vacation this week.
 7
                 Of course, I didn't get this until five
8
   o'clock on Friday so we had no idea -- you know, we
9
   didn't know it was going to be on the dispute list.
    So I'm really pretty much at a loss to sort of debate
10
   Mr. Keevil or anybody about whether they're right or
11
12
    they're wrong on it.
                 When we made the objection, we made the
13
    objection because we don't believe we have this
14
15
    information. We would have to do analysis to get it.
    They're saying well, maybe that's not true starting in
16
17
    June. I can't -- I can't speak to that.
                 What I can do is commit that when
18
   Mr. Wills gets back, I will talk to him about it and
19
20
   we will reach back out to Staff and see if we can have
    a discussion and work it out or not. But -- but not
21
   having any knowledge that it was going to come up
22
23
    today until five o'clock on Friday, my hands are tied
24
    to really do that today.
25
                 JUDGE WOODRUFF:
                                  Okay.
```

```
MR. KEEVIL: And when does he come back
1
 2
    from vacation, Jim?
                 MR. LOWERY: I believe he's back next
 3
 4
   week.
5
                 JUDGE WOODRUFF: Well, I'd suggest you --
 6
   Mr. Keevil and Mr. Lowery, if you can work this out
 7
   next week, that's great. If you continue to disagree
 8
   and it needs to come to me for resolution, you don't
 9
   have to wait a month. You can go ahead and file an
    appropriate motion and I'll take it up.
10
                 MR. KEEVIL: Okay. The other ones,
11
12
    Judge, the three hundreds, I believe those are
    auditing data requests. Ms. Ferguson I believe is on
13
    the line and probably could address those.
14
15
    Ms. Ferguson, are you here?
                 MS. FERGUSON: Yes, I am on the line.
16
17
    far as DRs 301, 302 and 337, I have had discussions
    with company on these items. I tried to notify them
18
    at least -- several days ahead of the discovery
19
20
    conference, at least notify them that I believe
    they're insufficient.
21
                 And I've had discussions with
22
   Mr. Lansford about 301 and 302. Those are DRs that
23
24
    deal with the Department of Energy reimbursement for
25
    dispensed nuclear fuel fees. Company receives
```

1 reimbursement at least once a year for costs that they 2 submit.

And what I requested in these DRs was a listing of the amounts and the details for what was requested of the DOE, what was accepted and what was denied and what made up those variances. And I also asked for the journal entries associated with the reimbursement to make sure that customers were made whole for those items that were reimbursed.

I was provided journal entries, but they were not in the detail that I needed. So what they did was they provided me journal entries of accounts receivable versus cash that was received, but I need to have the detailed journal entries with respect to any capital or expense items. So I need to have those.

And then in DR-337, we asked for legal and outside consulting costs in association with the Rush Island Clean Air Act violation that -- you know, that Ameren has been litigating.

And I think there was just kind of a misunderstanding in the reading of that DR. I think at first the company had thought that we were requesting information regarding legal only and not just outside consultants.

```
1
                 And so I've requested some invoices and
 2
    some journal detail -- I'm sorry, general ledger
    details regarding those items. And I've been told
 3
    that I will be provided those items. And -- and I
 5
    think company understands what I'm looking for now.
 6
    So I think it's just a -- a matter of getting the
 7
    responses from company on 301, 302 and 337.
 8
                 We received 345 this morning and I am
 9
   waiting on one of the auditors to let me know if that
    is sufficient for the supplemental response.
10
                 MR. LOWERY: Judge on 301, 302 and 337,
11
12
    Ms. Lange -- or Ms. Ferguson and Mr. Lansford, as I
    understand it, talked last Wednesday. And I think --
13
14
    I think we agree we are going to supplement those.
    There was some misunderstanding about exactly what was
15
    needed, but I think -- and Mitch is on the line so
16
   he'll be able to confirm. I think we do understand
17
    what's being asked for and I think now we can
18
    supplement those. I don't think there's actually any
19
20
    dispute about those.
                 JUDGE WOODRUFF: Okay. Well, that sounds
21
    good. I think that takes care of the electric side.
22
23
    Was there anything else we need to talk to -- about on
    the gas side?
24
25
                 MR. KEEVIL: Judge, I believe Mr. Lowery
```

```
addressed the gas at one point during his response on
1
 2
   the electric side questions and indicated that they
   would -- the only thing really that's still hanging
 3
   out that -- on the gas side is response to 99.1 and
5
    222.1.
6
                 I know he said that the response to
7
    222.1, they were going to provide within the next --
8
   before the end of the week I think he said. I don't
9
   remember what he said on 99.1.
                 MR. LOWERY: It was the other way around.
10
    I think 99.1 any day now; today or tomorrow, I think.
11
12
                 222.1 is the same as 166.1 on the
    electric. It's the one that the person who has to
13
14
    answer it has been on vacation for an extended period
    and is not back until tomorrow. And I committed to
15
16
    getting with that person tomorrow. And I can't tell
17
   you exactly when you're going to get your answer, but
   we'll certainly try to expedite it.
18
                 JUDGE WOODRUFF:
19
                                 Okay. Was there
20
    anything else, Mr. Keevil?
                 MR. KEEVIL: I -- I don't think so.
21
   Ms. Meyers, did I miss anything?
22
23
                 MS. MYERS:
                             I don't believe you did.
24
                 JUDGE WOODRUFF: Okay. Anything else
    from Ameren?
25
```

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```
MR. LOWERY: Nothing from us, Judge.
1
 2
    Thank you.
 3
                 JUDGE WOODRUFF: Okay. Well, I believe
   we're -- we've had a productive conference here and I
   think this will bring it to an end. As always, if you
5
   do have disputes that come up between these meetings,
 6
   you can certainly bring them to my attention also.
   And I believe we have another one coming up in August.
8
 9
    So with that then, we'll end the meeting. Thank you
   all.
10
11
                 (Whereupon, the conference was
12
    concluded.)
13
14
15
16
17
18
19
20
21
22
23
24
25
```

CERTIFICATE OF REPORTER

I, Tracy Thorpe Taylor, CCR No. 939, within the State of Missouri, do hereby certify that the testimony appearing in the foregoing matter was duly sworn by me; that the testimony of said witnesses was taken by me to the best of my ability and thereafter reduced to typewriting under my direction; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this matter was taken, and further, that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.

Tracy Thorpe Taylor, CCR

	21st 76:25 80:1		615 48:23 67:4,7
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