

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariffs to Adjust)
Its Revenues for Electric Service)

Case No. ER-2022-0337

PUBLIC COUNSEL’S MOTION TO MAKE INFORMATION PUBLIC

COMES NOW the Office of Public Counsel and moves the Commission to make public information that Ameren Missouri has designated “confidential” on the grounds following:

1. Ameren Missouri is seeking to recover from its retail customers through its general electric retail tariff rates costs it incurs for its Power Play Goals for Kids program which it publicly discloses that “Each time the Blues score a **power play goal** during the 2022-2023 regular season, Ameren Missouri is **donating \$500** to one local kid's charity. And thanks to your votes, one charity will skate away with the entire donation. So Let’s Go Blues! — because **when they score power play goals, kids win!**”¹

2. Public Counsel posed the following data request (No. 2023) to Ameren Missouri: “Please provide a copy of each and every contract Ameren Missouri or any of its affiliates entered into with the St. Louis Blues where Ameren Missouri ratepayers funding was utilized.” In response Ameren Missouri provided a copy of a contract and stated the following:

Ratepayers do not bear any specific cost; ratepayers pay for service, the rates for which are based on a revenue requirement which itself is based on a given test year's costs and revenues, with appropriate normalization and other adjustments. Attached are contracts the cost of which were paid for by Ameren Missouri. Only sums paid under these contracts during a test year have been included as advertising expense in Company's initial revenue requirement request. The last several Ameren Missouri revenue requirements have been resolved by settlement, so it is not known what contract costs were included in those black box numbers.

¹ URL: <https://powerplaygoalsforkids.com/#:~:text=7%3A05%20AM-.Ameren%20Missouri%20and%20the%20St..away%20with%20the%20entire%20donation> (Accessed at 3:42 PM on February 8, 2023).

Schedule gm-4c to the direct testimony of Public Counsel witness Dr. Geoff Marke, Ph.D. prefiled on January 10, 2023, is a copy of that same contract which is designated confidential.

3. Because Ameren Missouri has included in its revenue requirement in this case upon which its 11.61% rate increase is based costs for its Power Play Goals for Kids program, all who benefit and how they benefit from the costs Ameren Missouri is requesting that its retail customers bear through their electric bills associated with that program should be made public, including, but not necessarily limited to, the ** _____ ** that Dr. Geoff Marke identifies on pages 19-20 of his prefiled direct testimony.

Wherefore, the Office of Public Counsel prays the Commission make public at least the testimony identified to be confidential on pages 19-20 of Dr. Marke's direct testimony prefiled on January 10, 2023.

Respectfully,

/s/ Nathan Williams
Nathan Williams
Chief Deputy Public Counsel
Missouri Bar No. 35512

Office of the Public Counsel
Post Office Box 2230
Jefferson City, MO 65102
(573) 526-4975 (Voice)
(573) 751-5562 (FAX)
Nnathan.Williams@opc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 15th day of February 2023.

/s/ Nathan Williams