

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

In the Matter of The Empire District Electric)
Company's Application for Approval of a)
Transportation Electrification Portfolio for)
Electric Customers in its Missouri Service)
Area.)
File No. ET-2020-0390

RESPONSE

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") and provides its response to the Missouri Public Service Commission's ("Commission") *Order Directing Filing* ("*Order*") issued on March 9, 2021. That *Order* requires Ameren Missouri to provide good cause for why its February 26, 2021 intervention request was filed after the December 30, 2020 deadline for intervention requests. In support of its position, Ameren Missouri states as follows:

1. As the Commission is aware, Ameren Missouri has been actively engaged in the topic of transportation electrification.¹ Transportation electrification is a rapidly evolving topic that has significant implications for Ameren Missouri customers and Missouri's economy, and is increasingly a focus at the national level. Accordingly, Ameren Missouri monitors other transportation electrification cases filed before the Missouri Public Service Commission.

2. Ameren Missouri had been specifically monitoring The Empire District Electric Company's ("Empire") above-captioned case through the Commission's EFIS when it noted that a series of technical conferences was included in the proposed procedural schedule. Technical conferences can be a valuable source of information sharing, but are typically limited to the parties in a given case. While Ameren Missouri planned to continue monitoring publicly available

¹ See Ameren Missouri's Charge Ahead pilot programs approved in File No. ET-2018-0132 and the settlement recently filed in its Efficient Electrification matter in File No. ET-2021-0020.

information through case filings and the broadcast of live hearings in this matter, the Company would not typically have access to technical conferences. Ameren Missouri believes it has information and experience it may both gain and provide to others through participation in these technical conferences. Ameren Missouri could not have requested intervention sooner because it was not aware of the intent to schedule these technical conferences until the procedural schedule filing was made.²

3. Should the Commission determine this is insufficient rationale for Ameren Missouri to be granted intervention, the Company requests that it still be allowed to participate in the technical conferences.

WHEREFORE, for the reasons cited above, Ameren Missouri respectfully requests that the Commission grant its request for intervention, or in the alternative, allow it to participate in the technical conferences established in the procedural schedule.

Respectfully submitted,

/s/ Paula N. Johnson

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² Anticipating that a similar route may be pursued in the Evergy Metro Inc. d/b/a Evergy Missouri Metro transportation electrification matter in File No. ET-2021-0151, Ameren Missouri timely filed for intervention in that case.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the Staff of the Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 11th day of March, 2021.

Paula N. Johnson
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