BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of a Proposed Amendment to	)	
Commission Rule Regarding Applications	)	File No. EX-2018-0189
for Certificates of Convenience and Necessity.	)	

ADDITIONAL COMMENTS OF AMEREN MISSOURI

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), and submits additional comments to address matters raised in earlier-filed comments on the proposed amendments to 4 CSR 240-3.105, as follows:

1. In these Additional Comments, Ameren Missouri will address the most important aspects of other comments filed on June 14[1] which it may not have already addressed in initial Comments, or which bear further explanation. Failure to address a specific aspect of the other parties' June 14 comments should not be taken as an endorsement of them, nor should it necessarily suggest disagreement.

STAFF'S JUNE 14 COMMENTS

2. Staff's Comments are little more than a general expression of support for the proposed rule and its extensive changes and additions to the existing CCN rule. Most of the substantive points made by the Staff were already addressed in Ameren Missouri's June 14 Comments, but a few points should be addressed here.

3. As KCPL[2] pointed out in its June 14 Comments, the proposed rule's language relating to infrastructure "paid for by Missouri retail ratepayers," and Staff's endorsement of such a concept, is directly contrary to law. Indeed, it appears that Staff's "support" for the broad changes to the CCN rule may be grounded in the mistaken premise that Section 393.170

[1] In Wind on the Wires' case, June 15
[2] Kansas City Power & Light Company and KCPL-Greater Missouri Operations Company.

somehow gives the Commission plenary authority as to any asset reflected in the revenue requirement used to set Missouri retail rates under the theory that customers "pay for" the assets. They do not, and Section 393.170 confers no such authority:

> customers pay for service, not for the property used to render it. Their payments are not contributions to depreciation or other operating expenses or to [sic] capital of the company. By paying bills for service they do not acquire any interest, legal or equitable, in the property used for their convenience or in the funds of the company. Property paid for out of monies received for service belongs to the company just as does that purchased out of proceeds of its bonds and stock.[3]

4. On the second page of Staff's June 14 Comments, the Staff states that under the proposed rules a CCN would not be required for "new facilities in the electric utility's certificated service territory." As pointed out in Ameren Missouri's June 14 Comments, the interplay of the definition of "construction" and the purported exemptions make that far less than clear. It certainly does not appear to be true as to substations and it is not true as to new generating plants, which under *StopAquila* must be the subject of a CCN proceeding. Moreover, even if it is the Staff's intention that new distribution and transmission (including substations) within the utility's service territory would be exempt, as written the proposed rule would still reach nearly all of the 51 projects Ameren Missouri identified in its initial Comments, meaning that under the current rule an application would not have been required, but under the proposed rule, an application would be required.

5. Also on page 2, the Staff indicates it is "not aware" of any statute or case law that limits the Commission's jurisdictional reach under Section 393.170 to Missouri facilities. Staff's "awareness" is irrelevant to the legal limits of the Commission's authority. Staff is undoubtedly

[3] *Board of Pub. Util. Comm'rs v. New York Tele. Co.*, 271 U.S. 23, 32 (1926). *See also Illinois Pub. Telecommunications Assoc. v. FCC*, 117 F.3d 555, 569 (D.C. Cir. 1997) ("As a general rule, utility service ratepayers pay for service and thus do not acquire any interest, legal or equitable in the property of the company."); *State ex rel City of St. Joseph v. Pub. Serv. Comm'n*, 325 Mo. 209, 223 (1930) (citing *Board of Pub. Util. Commissioners v. New York Telephone Co.*).

aware that numerous facilities that the proposed rule would now purport to reach have been constructed in other states without the Staff or the Commission claiming the broad out-of-state authority the proposed rule purports to claim now.[4] Moreover, Staff's lack of awareness is completely at odds with Staff's not-so-distant position that Section 393.170 did not provide authority extending outside the state, as pointed out in Ameren Missouri's June 14 Comments, as follows: "Regarding out-of-state "jurisdiction," the Staff indicated that while the CCN statute 'addresses the siting of the construction of gas plant, electric plant, water corporation [sic] or sewer system *in the State of Missouri* . . . [i]t does *not address* the siting . . . in states other than Missouri . . .'" (emphasis added).[5]

DOGWOOD'S JUNE 14 COMMENTS

6. Dogwood simply attached the comments it filed in the 2016 rulemaking, the points it made there having already been addressed in Ameren Missouri's June 14 Comments. However, Dogwood did mark-up the currently proposed rule.

7. Attached to these Additional Comments as Exhibit 1 is Dogwood's mark-up but containing Ameren Missouri's comments thereon.[6] In addition, a couple of observations about Dogwood's Comments are also worth making here.

8. The overarching takeaway from Dogwood's June 14 Comments and its mark-up is that Dogwood reads Section 393.170 in a manner that gives the Commission virtually unlimited authority over all resource decisions, and over the means through which a utility

[4] KCPL and Empire point to examples of out-of-state plants for which a CCN was not required. One not mentioned is Ameren Missouri's Venice, Illinois plant, which initially was a coal-fired facility but more recently, a gas generation facility was built there. Ameren Missouri does not have a CCN for that plant; no one ever suggested one was required.

[5] Additional Comments of the Staff of the Missouri Public Service Commission, File No. EX-2015-0225, p. 2 [EFIS Item No. 29].

[6] Ameren Missouri converted the scanned version Dogwood submitted and then provided comments. The conversion was largely successful, but there are a few places where characters are missing or spacing appears to be off.

makes such decisions. This overreading of the Commission's statutory authority has led to years of debate about proposed changes to the CCN rule that neither *Stop Aquila* nor *Cass County* require, and about which there has been virtually no showing of need. We repeat a point we and others have made before: other than updating the CCN rules to account for *Stop Aquila* and *Cass County* and other clarifications or reorganization that will make the rule more straightforward to apply, why is a rule that if adopted would reflect a massive broadening of the application of the CCN rule beyond the statutory basis for the rule, under consideration at all?

OPC'S JUNE 14 COMMENTS

9. The Company will address a few points made by OPC.

10. First, OPC (the Division of Energy made the same point) is correct that any revised CCN rule must exclude from any CCN filling requirements construction of a generating unit with a capacity of 1 megawatt or less. Effective August 28, 2018, Section 393.170.1 will no longer allow the Commission to require a CCN for such a facility.

11. Second, the largely agreed-upon proposal to provide mailed notice to landowners within 300 feet of the centerline of a proposed transmission line should not be expanded to a requirement that such a notice be provided to landowners within one mile of a proposed generating plant and substations associated with such a plant. The nature of a transmission line project is that it will require the permanent use of other's land (often dozens if not hundreds of landowners) through permanent easements. While the underlying land uses and the transmission line can and do coexist, there usually is an impact on the underlying use, for which landowners are compensated. The idea behind sending a specific notice to landowners within 300 feet of the centerline is that while the basic transmission line route is known when the CCN is being processed (along with the landowners from whom it is expected an easement will be obtained),

alignment changes can move the line a bit as line design occurs. Those alignment changes sometimes mean landowners near the original centerline may end up being directly affected by an easement. Those considerations simply do not apply to landowners within a mile of a proposed generating plant. If a generating plant is to be built, the utility will buy the land in fee from the landowners, and usually some buffer land, paying full fair market value. Most of the time this will be a relatively small set of landowners, certainly as compared to most transmission line projects. Putting a pin on a map where the plant would be located, drawing a circle with a mile radius, and mailing notice to every landowner within that circle is unnecessary and burdensome as the utility is not going to need to buy land from those potentially dozens if not hundreds of other landowners. For a generating plant and any associated substation, it would make far more sense to publish notice in general circulation newspapers covering the plant site and the vicinity.

12. Lastly, in paragraph 9 of its June 14 Comments OPC makes several specific suggestions for edits to the proposed rule. Those suggestions are reproduced below, with Ameren Missouri's commentary on them appearing in *[italics]*:

> proposed rule 4 CSR 240-20.045 could be improved by changing the term defined as "asset" to "generating plant asset," with corresponding revisions to the text of the rule referring to generating plants and related plant *[see Exhibit A to Ameren Missouri's initial Comments]*; making it clear whether the definitions are exhaustive or not (several use the word "includes") *[Agree – Ameren Missouri made the same point]*; revising definitions included for the word "construction" so they do not circularly include the word "construction" that is being defined *[Agree with concept]*; clarifying the intent of 4 CSR 240-20.045(1)(C)6.C. as it is unclear that there is any transmission project that only has a relationship to Missouri ratepayers "through the regional transmission organization/independent system operator cost allocation process" as stated in 4 CSR 240-20.045(1)(C)6.C. *[Appropriately revised, the rule need not contain this definition since it was only directed at limiting application of the proposed rule to out-of-state facilities]*; revising 4 CSR 24020.045(2) to be limited to applications by electrical corporations, not "to all applications for a certificate of convenience and necessity" *[agree since this is an electrical corporation*

rule]; eliminating 4 CSR 240-20.045(2)(E) since it makes no sense that the Commission issue a certificate that is imprudent from a public interest standpoint and, like 4 CSR 240-20.045(2)(D) it is not a requirement, which the rule states that it is *[agree in concept]*; requiring the map referred to in 4 CSR 240-20.045(3)(A) to be of the same scale as the map required by 4 CSR 240-20.045(3)(D) *[agree]*; changing the word "The" at the beginning of 4 CSR 24020.045(3)(C) to "A" since there is more than one way to write a legal description *[agree]*; changing the words "An indication" at the beginning of 4 CSR 240-20.045(5)(E) to "A statement" *[Agree]*; changing the word "construction" in 4 CSR 240-20.045(5)(I) and 4 CSR 240-20.045(5)(J) to "asset" or, if asset changed to "generating plant asset" as suggested above, then "generating plant asset"; defining what a "common electric transmission line(s)" is as used in 4 CSR 240-20.045(6)(E) *[Issues adequately addressed in suggested version of rule provided by Ameren Missouri with its initial Comments]*; and the Office of the Public Counsel sees no reason to limit the requirements of 4 CSR 24020.045(5)(G), (H) and (6)(G), (H) to non-incumbent electric providers, which may mean something different than non-incumbent electric utilities *[Also already adequately addressed given Ameren Transmission Company of Illinois' suggested definition of "non-incumbent electric providers"]*.

WIND ON THE WIRES ("WOW") JUNE 15 COMMENTS

13. For the reasons outlined in detail in Ameren Missouri's June 14 Comments, the various competitive bidding provisions contained in the proposed rule should not be included in any final CCN rule adopted in this docket. This is true of such proposals as a whole and it is true of WOW's suggestion that the Commission adopt "standards" for competitive bidding processes, including forcing utilities to cede selection of a winning bid to an "independent administrator." That same proposal was made by Dogwood in its 2014 petition and was opposed by all of the responding utilities, and by the Staff itself.

Respectfully submitted,

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Title 4—DEPARTMENT OF ECONOMIC DEVELOPMENT
Division 240—Public Service Commission
Chapter 20 — Electric Utilities

PROPOSED RULE
4 CSR 240-20.045 Filing Requirements for Electric Utility Applications for Certificates of Convenience and Necessity

PURPOSE: This proposed rule outlines the requirements for applications to the commission, pursuant to section 393.170 RSMo, requesting that the commission grant a certificate of convenience and necessity to an electric utility for a service area or to acquire or to construct an electric generating plant, a substation, an electric transmission line, or a gas transmission line that facilitates the operation of an electric generating plant.

(1) Definitions. As used in this rule, the following terms mean:

(A) Acquire or acquisition means obtaining full or partial ownership by purchase or capital lease.

(B) Asset includes electric generating plant, substation, switching station, electric transmission line, or gas transmission line that facilitates the operation of electric generating plant regardless of whether the item(s) to be acquired/constructed is located inside the electric utility's certificated service area or is located outside the electric utility's certificated service area but will be used to serve Missouri customers and paid for by Missouri retail ratepayers.

(C) Construction includes:

1. Construction of new asset(s) other than substation, electric transmission line or gas transmission line;
2. Construction of a new electric transmission line or a rebuild of such a transmission line that will result in a significant increase in the capacity of the transmission line, or a change in the route or easements;
3. Construction of a new substation or a rebuild of the substation that will result in a significant increase in the capacity and/or size of the substation;
4. Construction of a new gas transmission line that facilitates the operation of an electric generating plant or a rebuild of such a gas transmission line that will result in a significant increase in the capacity of the gas transmission line that facilitates the operation-ocamelnethie-generating-plant, or a change in the route or easements of the gas transmission line; and
5. Improvement or retrofit of an electric generating plant that will result in:
   A. A substantial increase in the capacity of an electric generating plant beyond the planned capacity of the plant at the time the Commission granted the prior certificate of convenience and necessity for the electric generating plant;
   B. A material change in the discharges, emissions, or other environmental by-products of the electric generating plant than those projected at the time the prior certificate of convenience and necessity was granted by the commission for the electric generating plant;
   C. An increase in the useful life of an existing electric generating plant; or,
   D. A **10%** increase in rate base.

Comment [JL1]: CCN statute cannot extend to acquisitions as a matter of law.

Comment [JL2]: Ameren Missouri definition should be used, including that a substation (or switching station) should be considered as part of the transmission line. Ameren Missouri has no objection to references to both a substation and switching station.

Comment [JL3]: Ameren Missouri definition should be used.

Comment [JL4]: A rebuild is not "construction" as explained in Ameren Missouri's initial comments; this change would reduce the scope of rebuilds to which the rule purports to apply.

Comment [JL5]: Without endorsing application to rebuilds at all, the word "the" should be "such" for consistency

Exhibit 1

6. Construction does not include:

A. Construction of a new substation, switching station, electric transmission line or a new gas transmission line that facilitates the operation of electric generating plant if the assetthie to be constructed is in the electric utility's Missouri certificated service area;

B. Periodic, routine or preventative maintenance or replacement of failed or near term projected failure of equipment or devices with the same or substantially similar items that are intended to restore the asset substation to an operational state at or near a recently rated capacity level; or,

C. Transmission projects where the only relationship to retail rates paid by Missouri ratepayers is through a regional cost allocation resulting fromthe regional transmission organization/independent system operator cost allocation process.

(2) An electric utility must obtain a certificate of convenience and necessity pursuant to Section 393.170 R.S.Mo prior to providing electric service to retail customers in a service area, prior to acquisition of an asset, and prior to construction of an asset, and must exercise the authority granted within two years from the grant thereof.

Q2) In addition to the general requirements of 4 CSR 240-2.060(1), the following additional general requirements apply to all applications for a certificate of convenience and necessity, pursuant to Section 393.170 RSMo:

(A) The application shall include facts showing that granting the application is necessary and ~~or~~ convenient for the public service.

(B) Evidence that the electric utility has complied or will comply with all applicable municipal ordinances.

(C) If an asset to be acquired or constructed is outside Missouri, the application shall include plans for allocating costs, other than regional transmission organization/independent system operator cost sharing, to the applicable jurisdictions.

(D) If any of the items required under this rule are unavailable at the time the application is filed, the unavailable items may be filed prior to the granting of authority by the commission, or the commission may grant the certificate subject to the condition that the unavailable items be filed before authority under the certificate is exercised.

( ) The commission may, by its order, impose upon the issuance of a certificate of convenience and necessity such condition or conditions as it may deem reasonable and necessary.

(A) In determining whether to grant a c€;ertificate of cConvenience and nNecessity, the commission may, by its order, make a determination on the prudence of the decision to acquire or construct an asset.leet-fiestation$_r$-an—eleetrie ~~transmission lin generating plant~~ subject to the commission's post-construction review of the project.

(444) If the application is for authorization to provide electric service to retail customers in a service area for the electric utility, the application shall also include:

(A) A list of those entities providing regulated or nonregulated retail electric service in all or any part of the service area proposed, including a map that identifies where each entity is providing retail[2] electric service within the area proposed;

Comment [JL6]: Unlawful attempt to expand the reach of the CCN statute via a rule. The statute confers the jurisdiction it confers; no more; no less. Regardless, this is contrary to the correct principle not to repeat/paraphrase in a rule provisions already covered by the statute.

Comment [JL7]: Section 393.170.3 expressly indicates the Commission is to determine whether such construction or exercise of a privilege is necessary OR convenient; both are not required as a matter of law.

Comment [JL8]: Statute requires what it requires; rule need not repeat or attempt to restate it.

(B) If there are ten (10) or more residents or landowners, the name and address of no fewer than ten (10) persons residing in the proposed service area or of no fewer than ten (10) landowners, in the event there are no residences in the area, or, if there are fewer than ten (10) residents or landowners, the name and address of all residents and landowners;

(C) The legal description of the service area to be certificated;

(D) A plat of the proposed service area drawn to a scale of one-half inch (1/2") to the mile on maps comparable to county highway maps issued by the state's Department of Transportation or a plat drawn to a scale of two thousand feet (2,000') to the inch; and

(E) A feasibility study containing plans and specifications for the proposed **utility system and estimated cost of the construction of the utility system during the first three (3) years of construction; plans for financing and leasing; proposed rates and charges; and an estimate of the number of customers, revenues, and expenses during the first three (3) years of operations.**

(F) The charter of the applicant.

(E)(G) A verified statement of the president or secretary of the corporation showing that it has received the required consent of the proper municipal authorities.

(14) **If the application is for authorization to acquire an assets, the application shall also include:**

(A) A description of the asset(s) to be acquired including location;

(B) The value of the asset(s) to be acquired;

(C) The purchase price and plans for financing the acquisition, or the terms of the proposed capital lease;

(D) Plans and specifications for the assetutility system, **including as-built drawings;**

E Evidence that an electr rovidin retail service utilized a non-discriminatory fair and reasonable competitive bidding 'ocess to evaluate whether the proposed construction or other alternatives such as purchased power capacity, or an alternative energy source would be the more reasonable resource.

(6) If the application is for authorization to construct **assets** other than electric transmission line or gas transmission line, the application shall include:

(A)A description of the proposed route or site of construction;

(B) A list of all electric, gas, and telephone conduit, wires, cables, and lines of regulated and nonregulated utilities, railroad tracks, and each underground facility, as defined in section 319.015, RSMo, which the proposed construction will cross or share easement(s);

(C) A description of the plans, specifications, and estimated costs for the complete scope of the construction project that also clearly identifies what will be the operational features of the each asset operation of electric generating plant once it is fully operational and used for service;

(D)The projected beginning of construction date and the anticipated fully operational and used for service date of each assetlgene a ~~line that facilitates the operation of electric~~g plant, substation, o • gas transmission ~~the certificate of convenience and necessity~~;

(E) A description of any common plant included inn the construction project for which the certificate-of cotwenialee-anki-aeseasity-ts-being-sought-wttl

Comment [JL9]: Capital leases are a means for financing; this addition would likely simply inject confusion into what is required.

Comment [JL10]: Unnecessary

Comment [JL11]: Statute already requires what it requires; rule should not seek to duplicate or paraphrase

Comment [JL12]: At a minimum, should read "including the terms of any capital lease used in the financing"; provision is, however, unnecessary

Comment [JL13]: For reasons given in Ameren Missouri's initial comments competitive bidding provisions has no place in the CCN rule; moreover, given the broad definition of "asset," requiring these comparisons beyond a generation asset is overbroad

(F) Plans for financing the construction of the assetelectric generating plant, **substati n, or gas transmission line that facilitates thc operation of cicctric generating plant;**

(G)For non incumbent an electric utility providing retail servicepro rs, an overview of plans for operating and maintaining the asset ~~electric generating plant, substation, or gas transmission line that facilitates the operation of electric generating plant~~;

(H)For n n incumbent an **electric utility providing retail service providers, an overview of plans for restoration of safe and adequate service after significant, unplanned/forced outages of the asset**

(I) Evidence that anthe electric utility providing retail service utilized a non-discriminatory, fair, and reasonable process to evaluate whether the proposed construction or alternative solutions would be more reasonable, renewable energy resources would provide a reasonable alternative t the co: Pro Posed;

(J) Evidence that anthe electric utility providing retail service utilized a non-discriminatory, fair, and reasonable competitive bidding process to evaluate whether the proposed construction or other alternatives such as purchased power capacity or ansuppliers of alternative energy source would be the morea reasonable resource in lieu of the construction proposed; and

(K)Evidence that anthe electric utility providing retail service utilized or will utilize a non-discriminatory, fair, and reasonable competitive bidding process for entering into contracts for the design, engineering, procurement, construction management, and construction of the asset~~electric generating plant, substation, or gas transmission line that facilitates the operation of electric generating plant~~.

(76) **If the application is for authorization to** acquire or **construct an electric transmission line or** a gas transmission line, **the application shall also include:**

(A) A description of the proposed route or site of construction;

(B) A list of all electric, gas, and telephone conduit, wires, cables, and lines of regulated and nonregulated utilities, railroad tracks, and each underground facility, as defined in section 319.015, RSMo, which the proposed construction will cross or share easement(s);

(C) A description of the plans, specifications, and estimated costs for the complete scope of the construction project that also clearly identifies what will be the operational features of the electric **transmission line once it is fully operational and used for service;**

(D)The projected beginning of construction date and the anticipated fully operational and used for service date of the electric **transmission line;**

(E) A description of any common plant to be included inn—indigatien--84--whethef **the construction project** cing sought will

(F) Plans for financing the construction of the electric **transmission line;**

(G)For n n incumbent electric pr viders, **aFor** an electric **utility** providing retail service, an overview **of plans for operating and maintaining the electric-transmission line;**

(H)For non incumbent-eleetriera.4deiLs$_r$ **a For an electric utility providing retail service, an overview of plans for restoration of safe and adequate service after significant, unplanned/forced outages of the Geste$_4$ transmission line;**

(I) Evidence that anthe electric utility providing retail service **utilized or will utilize a**

Comment [JL14]: All these references to "retail service providers" should say "in Missouri".

Comment [JL15]: This provision is a significant improvement.

Comment [JL16]: Per earlier comment, provision is inappropriate but also too broad.

non-discriminatory, fair, and reasonable competitive bidding process for entering into contracts for the design, engineering, procurement, construction management, and construction of the electric transmission line; and

(J) An affidavit or other verified certification of compliance with the following notice requirements to landowners directly affected by electric transmission line routes or substation locations proposed by the application, including.

include a list of all directly affected landowners to whom notice was sent:,

1. Applicant shall provide notice of its application to the owners of land, or their designee, as stated in the records of the county assessor's office, on a date not more than sixty (60) days prior to the date the notice is sent, who would be directly affected by the requested certificate, including the preferred route or location, as applicable, and any known alternative route or location of the proposed facilities. For purposes of this notice, land is directly affected if a permanent easement or other permanent property interest would be obtained over all or any portion of the land or if the land contains a habitable structure that would be within three hundred (300) feet of the centerline of an electric transmission line.
2. Any noticeletter sent by applicant pursuant hereto shall be on its representative's letterhead or on the letterhead of the utility, and it shall clearly set forth
    A. The identity, address, and telephone number of the utility representative;
    B. The identity of the utility attempting to acquire the certificate;
    C. The general purpose of the proposed project;
    D. The type of facility to be constructed; and
    E. The contact information of the Public Service Commission and Office of the Public Counsel.
3. If twenty-five (25) or more persons in a county would be entitled to receive notice of the application, applicant shall hold at least one (1) public meeting in that county. The meeting shall be held in a building open to the public and sufficient in size to accommodate the number of persons in the county entitled to receive notice of the application. Additionally:
    A. All persons entitled to notice of the application shall be afforded a reasonable amount of time to pose questions or to state their concerns;
    B. To the extent reasonably practicable, the public meeting shall be held at a time that allows affected landowners an opportunity to attend; and
    C. Notice of the public meeting shall be sent to any persons entitled to receive notice of the application.
4. If applicant, after filing proof of compliance, becomes aware of a person entitled to receive notice of the application to whom applicant did not send such notice, applicant shall, within twenty (20) days, provide notice to that person by certified mail, return receipt requested, containing all the required information. Applicant shall also file a supplemental proof of compliance regarding the additional notice.

(87) Provisions of this rule may be waived by the commission for good cause shown.

*AUTHORITY: section 386.250, RSMo 2000. * Original rule filed Aug 16, 2002, effective April 30, 2003. *Original authority: 386.250, RSMo 1939, amended 1963, 1967, 1977, 1980, 1987, 1988, 1991, 1993, 1995, 1996; StoAciojkgIa.Or v. Aquila, Inc.,* 180 S.W.3d 24 (Mo.App. W.D. 2005); *State ex rel. Cass County v. Public Serv. C0712112'n,* 259 S.W.3d 544 (Mo.App. W.D. 2008); *State ex rel. Harlin v. Public Serv.*$_5$ *Comm'n,* 343 S.W.2d 177 (Mo.App. K.C. 1960).

Comment [JL17]: Ameren Missouri does not object to Dogwood's minor grammatical suggestions in this subsection, but the edits suggested in Ameren Missouri's initial comments should also be made for the reasons given.