

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

In the Matter of the Union Electric Company d/b/a )  
Ameren Missouri's Tariffs to Increase Its ) File No. ER-2021-0240  
Revenues for Electric Service. )

**REQUEST TO LATE FILE EXHIBIT**

**COMES NOW** Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri")  
and, in support of its *Request to Late File Exhibit*, states as follows:

1. On September 15, 2021, Ameren Missouri filed rebuttal testimony, including the rebuttal testimony of Tom Byrne.
2. Since that date, Ameren Missouri has become aware that an attachment (Schedule TMB-R1) to Mr. Byrne's testimony was not included in the filing.
3. The attachment is a response to a data request, so it has been available to all parties despite it not being attached. Accordingly, Ameren Missouri does not believe any party is prejudiced by this filing delay.
4. Ameren Missouri requests the Missouri Public Service Commission accept this late filed attachment as Schedule TMB-R1.

**WHEREFORE**, Union Electric Company d/b/a Ameren Missouri requests the Missouri Public Service Commission authorize the late filing of Schedule TMB-R1 to Mr. Byrne's rebuttal testimony and any other and further relief as it deems just and reasonable.

*(Signature on next page)*

Respectfully submitted,

UNION ELECTRIC COMPANY  
D/B/A AMEREN MISSOURI

*/s/ Wendy K. Tatro*

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served via electronic mail (e-mail) to all parties of record on this 29<sup>th</sup> day of October, 2021.

*/s/ Wendy K. Tatro*

Wendy K. Tatro

Ameren Missouri's  
Response to MPSC Data Request - MPSC  
ER-2021-0240

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

No.: MPSC 0139

With regard to the twelve months ending December 31, 2020, please provide a detailed description of the services that are provided by Edison Electric Institute. Please include a percentage of billings for each service or benefit from EEI. Of these services or benefits, please provide what is received by Ameren Missouri and what is received for the benefit of the ratepayer. Lisa Ferguson (Lisa.ferguson@psc.mo.gov)

**RESPONSE**

**Prepared By: Lauren Hemesath**  
**Title: Sr Financial Specialist, Regulatory Accounting**  
**Date: 04/27/2021**

While it is not possible to list every service provided by EEI, the following description details a large number of services EEI provides:

**Information Technology:**

- The EEI Technology Advisory Committee serves to keep members abreast of emerging strategic information technology and business issues that impact the energy industry. Participation allows Ameren Missouri to receive updates on federal and state actions as they happen, allowing us to take action or begin planning on issues relating to topics that impact our ability to provide service efficiently (e.g., cyber security, information security, including security of customer information).
- Attending committee meetings provides opportunities to meet with other industry professionals to:
  - Discuss similar issues and work to develop common solutions;
  - Learn from the experience of other utilities;
  - Benefit from expert speakers who discuss the future of legislation/regulations, which allows us to remain proactive in our compliance efforts by planning early and before requirements are mandatory;
  - Share resources to gain insight on pending governmental policies and regulations more efficiently and at a lower cost than if those resources had to be duplicated;

- Collaborate on evolving industry issues relative to the NERC Reliability Standards Infrastructure Protection requirements, Smart Grid deployment, cyber security, and emergency response, among others.
  - Participating in the CIO Executive Advisory Committee and the Electric Sector Coordinating Council (ESCC) Advisory Committee provides information sharing across the industry, particularly related to cyber security and telecommunications challenges. The cross industry collaboration is extremely helpful and instrumental in improving cyber defense and response capabilities across investor owned utilities, municipals and coops.
- The Cyber Security Working Group discusses emerging cyber security issues. EEI works with member companies and various Congressional committees in crafting legislation to address cyber-attacks against the electric power grid and to identify vulnerabilities that could be exploited.
  - We continually get updates from the NERC CIP drafting teams as they develop the new regulations.
  - EEI began facilitating the formation of the cyber mutual assistance program, initiated by the ESCC. This program is intended to be similar to the mutual assistance program for storm recovery. Ameren Services and Ameren Missouri are actively engaged in establishing the framework and procedures for this program.
  - EEI was instrumental in the creation and growth of the ESCC and remains active in its leadership and staffing. The ESCC serves as the principal liaison between the federal government and the electric power industry, with the mission of coordinating efforts to prepare for, and respond to, national-level disasters or threats to critical infrastructure. The ESCC includes electric company CEOs and trade association leaders representing all segments of the industry. Its counterparts include senior Administration officials from the White House, relevant Cabinet agencies, federal law enforcement, and national security organizations.

All of the above helps Ameren Missouri to more efficiently and effectively use information technology as part of providing service to customers, which helps us operate with lower costs than we could absent these benefits.

Early notice of federal/state regulations also helps us be more proactive in response, and avoid penalties for noncompliance.

**Controller's Function:**

- EEI provides value to the Controller's function in many ways, including: Educational forums that allow for the maintenance of utility-specific skills for accounting staff. Accurate financial statements allow the Missouri Public Service Commission (MoPSC) to properly set rates and are necessary to procure the capital necessary to invest and operate Ameren Missouri. EEI members receive discounts at their sponsored forums.
- Committees that allow for the sharing of questions and information related to various accounting topics, which assure we are properly thinking about and accounting for

various utility-specific issues. Accurate financial statements allow the MoPSC to properly set rates and are necessary to procure the capital necessary to invest and operate Ameren Missouri. Use of EEI, reduces company staff that may be necessary to respond.

- Coordinate responses with other leaders in the industry to accounting standard setters for requested comments on potential new accounting standards. Use of EEI, reduces Company staff that would be necessary to respond and allows for responses that represent the industry rather than an individual company.
- Daily Energy News service assures that staff is up to date on industry issues. Use of EEI, reduces company staff that may be necessary to stay abreast of emerging developments.
- Coordinate forums for interaction with investors that provide capital to utilities. These forums are an efficient method of meeting investors and potential investors versus multiple trips and other targeting methods.
- EEI regularly has meetings with the FASB, SEC and FERC to discuss industry accounting issues, helping these bodies better understand the utility industry's issues and help the utility industry understand their viewpoints resulting in higher quality financial reporting.
- EEI has been an effective forum to influence tax legislation and administrative rule making to minimize tax burdens on customers, especially in the area of capital recovery through depreciation and repairs. Annual dues invoices clearly indicate what percentage of member dues relate to public policy advocacy at the state and federal level.

### **Energy Efficiency:**

Ameren Missouri utilizes the services of EEI's Institute for Electric Innovation (IEI). IEI was created in 2008 to focus on accelerating the electric power industry's energy efficiency efforts and increasing the industry's associated investments. IEI works with the electric utility industry, regulators, policymakers and other stakeholders to advance customer side solutions for energy management including energy efficiency, demand response, distributed power, and customer focused technologies. The IEI resources were valuable to Ameren Missouri in creating Missouri Energy Efficiency Investment Act (MEEIA) and Green Tariff filings. IEI resources have been valuable to provide summaries and often include many references to Commission dockets in other states, which streamlines efforts for deeper research and insights.

### **Environmental:**

Ameren Missouri faces numerous critical environmental, natural resources and clean energy policy issues that impact our strategic planning and decision-making. EEI works closely with member company staff to assess potential implications of, and opportunities relative to, the current environmental, natural resources and clean energy landscape. EEI provides updates on federal and state actions related to environmental issues as they develop. This information helps us develop compliance strategies and take action to prepare for environmental regulations and issues that impact our industry in a proactive manner before requirements are mandatory. This enhances our ability to provide service efficiently and minimize cost impact to our customers. EEI provides dedicated environmental staff that is available to support members as well as coordinate the activities of committees on specific environmental topics such as air quality, water

quality, land and natural resource management and climate policy. The environment committees provide information sharing across the industry particularly related to environmental issues and challenges.

Attending the committee meetings allows us to meet with others from the industry which helps us to:

- Discuss similar issues and work to develop common solutions.
- Learn from the experience of other utilities.
- Benefit from expert speakers who discuss the future of legislation/regulations.
- Share resources to gain insight on pending governmental policies and regulations more efficiently and at a lower cost than if those resources had to be duplicated.
- Collaborate on current environmental issues affecting the industry, such as: air quality regulations; water quality regulations; coal combustion residuals; climate and energy policy

Specific examples include the following:

In the first week of his Administration, President Biden issued a number of Executive Orders (EOs or Orders). EEI provided information on EOs that addressed the environment, climate change, and environmental justice, signaling that these issues will infuse regulations and policy decisions across the Executive Branch during his Administration. The EEI information specifically identified key environmental rulemakings to be revised that helps Ameren Missouri to understand and assess potential implications of, and opportunities relative to, the current environmental, natural resources and clean energy landscape.

EEI member companies and staff continue to engage in extensive outreach to Congress on the industry's positive, forward-looking clean energy and climate record and priorities. This outreach has included briefings with key Congressional committees, coalitions and leadership, as well as individual Members and staff. There continues to be a significant amount of activity on climate policy at the state and regional levels.

EPA recently proposed to repeal and replace the Clean Power Plan (CPP) and EEI coordinated with the industry in those rulemakings. The Affordable Clean Energy (ACE) rule was proposed in August 2018 and finalized in July 2019. EEI's comments reiterated industry's views that, while any CPP replacement rule should reflect a source-based, inside-the-fenceline approach, any final rule must also provide significant flexibility to states in developing their compliance plans for covered units. EPA proposed revisions to the NSR program, which would provide coal-fired power plants more latitude to make efficiency improvements consistent with BSER without triggering NSR permit requirements, have been severed and moved to a separate rulemaking on a different timetable than the ACE rule. The final ACE rule includes several beneficial components that were supported by EEI and the industry to achieve cost-effective CO<sub>2</sub> emission reductions in a practical and achievable manner.

**Other:**

EEI continues to advocate that distributed generation and net energy metering policies end cost shifting and ensure all electricity customers who use the grid share equitably in the costs of maintaining it.

EEI is leading the industry's efforts on physical security, helping to develop standards for protecting critical assets from attack.

EEI sponsors the T&D Distribution, Transmission and Metering Conference held twice annually. This conference allows utility members to share experiences and gain insights into the latest technology.

RestorePower is an EEI workgroup that promotes continuous improvement of mutual assistance, emergency preparedness and emergency response among utilities and serves as a resource for participants of the Regional Mutual Assistance Groups. The EEI also sponsors a Mutual Assistance Conference twice a year where utilities meet to discuss issues, concerns, experiences and processes required during emergency response. The EEI has taken a supporting role in the National Event Response (NRE) that has been in development since Super Storm Sandy.

#### Other Conferences

- **Accounting** - These conferences provide a forum for member companies to discuss current issues in the electric and natural gas industries and an opportunity for professional development, including continuing professional education credits for certified public accountants employed throughout the industry. These meetings include speakers from accounting standard setting bodies, including the Financial Accounting Standards Board, Securities and Exchange Commission, and FERC, and independent public accounting firms. The meetings also provide opportunities for industry accounting professionals to meet with their peers, including breakout sessions to focus on specific accounting topics, to discuss accounting requirements and best practices that benefit customers through cost-effective, efficient, and accurate financial records and reports.
- **Business Diversity** - The Annual EEI Business Diversity Conference focuses on priorities for our industry, our customers, our suppliers, and our other stakeholders, and is designed for EEI member company representatives who work in the external affairs, procurement, supply chain, and community relations fields. The goal of this program is to identify and promote the utilization of diverse suppliers capable of meeting our industry's various procurement needs, consistent with many state requirements for members to use more diverse suppliers. This program is committed to pursuing relationships with diverse suppliers and using innovative approaches designed to continually improve business opportunities.
- **National Key Accounts** - EEI's National Key Accounts is a customer-oriented program where leading multi-site customers and electric company account representatives collaborate to develop efficient energy management strategies that can be integrated into facilities nationwide. By organizing a network of electric companies, trade allies, and industry leaders, the EEI National Key Accounts

program provides customers with vital advice on electricity needs and new, cutting-edge technologies.

- **Occupational Safety and Health** - Among other things, the meeting offers a safety benchmarking workshop, part of a comprehensive effort by EEI to help the industry establish best practices for occupational safety and health. In recent years, this group has undertaken work aimed at reducing the incidence of severe injuries and fatalities.
- **Transmission, Distribution, Metering, & Mutual Assistance** - EEI's Transmission, Distribution, Metering & Mutual Assistance Conference is the premier conference that focuses on transmission, distribution, metering, and mutual assistance issues for the investor-owned electric sector. This conference addresses the critical engineering and operations areas that are important to transmission, distribution, metering, and mutual assistance professionals.

EEI provides significant resources for Grid Resilience and power restoration related to storm response and recovery. EEI and member companies have devoted significant time and resources to strengthen the reliability and resiliency of the energy grid, which directly benefits customers. During weather events, EEI provides a coordinating function between members and with the federal and state governments. EEI also provides strategic communication support aimed at ensuring that customers have the most up-to-date information on safety and restoration.

EEI is an active member of the Electricity Subsector Coordinating Council (ESCC). The ESCC serves as the principal liaison between the federal government and the electric power sector coordinating efforts to develop and support industry-wide energy grid security and resilience initiatives in preparation for, and responding to, national-level disasters or threats to critical infrastructure.

EEI also continued to advocate for LIHEAP funding.

EEI led a multi-faceted aggressive campaign to retain lower dividend tax rates. The lower dividend tax rates benefits both Ameren Missouri and its customers who own common stock. EEI is still working to ensure a standard on rate-regulated accounting is maintained in the event that International Financial Reporting Standards (IFRS) is required.

EEI worked closely with NERC to streamline the process for addressing minor reliability violations that do not pose a threat to bulk power reliability, which will free up company resources to focus on more important reliability matters.

EEI has developed an online compliance training module that Ameren Missouri uses to help ensure compliance with anti-market manipulation rules.



EEI's Rail Transport workgroup coordinates the utilities responses to the issues related to railroad transportation, including rail transportation capacity, competition, reliability, rate reasonableness and grievance resolution.

EEI worked with OSHA on the final safety standard amendments governing the industry's operations, maintenance, and construction activities. EEI will continue to work with OSHA, member companies and IBEW to limit adverse impacts on the industry and to obtain clarification in key areas.

EEI-supported legislation to ensure effective and efficient implementation of the final coal ash rule by state regulatory agencies.

EEI Information Resources Center (IRC) is a centralized service that EEI members use for help with finding information or connecting with EEI subject specialists. The IRC provides readily available information and/or makes referrals to additional sources or contacts to support EEI members' research needs.

EEI is developing a framework for transportation electrification which includes charging infrastructure deployment, residential managed charging and commercial charging.

EEI and our member companies are committed to getting the energy we provide as clean as we can as fast as we can, without compromising on the reliability and affordability that our customers value.

It is not possible to assign a quantified dollar benefit to any one of the above items. However, given the very substantial benefits EEI membership provides it is obvious that the Company and its ratepayers receive benefits from the EEI membership that greatly exceed the membership fees.