

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

In the Matter of Ameren Missouri’s Request for a)
Waiver from Tariff Sheets 146 through 150.) File No. EE-2022-0329

**AMEREN MISSOURI’S REPLY TO PUBLIC COUNSEL’S
RESPONSE TO PROPOSED TARIFF REVISIONS**

COMES NOW, Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company), and for its reply to *Public Counsel’s Response to Proposed Tariff Revisions* (“OPC Response”), states as follows:

1. On May 27, 2022, Ameren Missouri sought a waiver of its existing Emergency Energy Conservation Plan, which is reflected in tariff sheets originally adopted in the 1970s, the focus of which was primarily on coal inventory levels but that did not account for significant changes in the electric industry, including Regional Transmission Organization operations under which Ameren Missouri has operated since 2004. The waiver was sought after consultation with Staff and OPC, who did not oppose the waiver, and the waiver request was served on both parties. The Commission approved the waiver through July 23, 2022. The waiver has since been extended to September 9, 2022.

2. As part of its consultations with the Commission’s Staff and OPC, Ameren Missouri committed to file a new Emergency Energy Conservation Plan and to do so by June 9, 2022. Thereafter, Ameren Missouri timely filed new tariffs sheets reflecting the new plan, which bore an effective date of July 9, 2022. The new Plan was updated to reflect current Company and market operations. The Commission ordered the Staff to file a recommendation regarding the tariff sheets by June 21, 2022. At Staff’s request, Ameren Missouri extended the effective date of the

tariff sheets to August 9, 2022 to give Staff additional time for its review. The Commission then extended the deadline for Staff's recommendation to July 21, 2022.

3. At Staff's request, on July 8, 2022 the Company made one change to the tariff sheets it submitted on June 9, 2022 by filing a substitute tariff sheet reflecting the requested change. The change dealt with the limitation of liability provisions of the proposed tariff, which as noted were changed from those originally filed on June 9, 2022 to match language suggested by the Staff.

4. On July 11, 2022, the Staff filed its recommendation to approve the pending tariff sheets, including the substituted sheet. The Commission ordered Ameren Missouri and the Office of the Public Counsel to respond by 3:00 p.m. July 14, 2022 regarding whether they agreed that the Commission should order the tariff sheets to take effect without further responses from the parties.

5. On July 12, 2022, Public Counsel filed its Response to Order Directing Filing, indicating that it needed more time for review and objecting to the tariff sheets "becoming effective on July 24, 2022, without an opportunity to file a response by July 21, 2022."

6. On July 21, 2022, OPC filed the OPC Response and raised several issues about the proposed tariffs. Thereafter, the Company was granted an extension of time to August 18, 2022 to respond to OPC's Response. As indicated in its request for the extension, the Company has met and conferred with Staff and OPC respecting OPC's issues, and the parties have reached agreement on a few changes to the currently pending tariff sheets, which resolve OPC's issues and are acceptable to the Staff. A redlined version of the currently pending tariff sheets showing those changes is attached hereto and incorporated herein by this reference as Exhibit A. Ameren has submitted substitute tariff sheets reflecting these changes.

WHEREFORE, Ameren Missouri requests that the Commission make and enter its order approving the now-pending tariff sheets and cancelling Original Sheet Nos. 146 - 150, or otherwise let the now-pending tariff sheets take effect by operation of law on September 9, 2022.

Respectfully submitted,

/s/James B. Lowery

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**ATTORNEYS FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 18th day of August, 2022, to Staff and the Office of the Public Counsel.

/s/James B. Lowery

M.O.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 146CANCELLING M.O.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 146APPLYING TO MISSOURI SERVICE AREAGENERAL RULES AND REGULATIONSVIII. EMERGENCY ENERGY CONSERVATION PLANA. CURRENT AND PROJECTED EMERGENCY CONDITIONS

This section of the Company's General Rules and Regulations reflects the Company's Emergency Energy Conservation Plan (the "Plan"). Upon declaration by the Reliability Coordinator of the occurrence of a capacity emergency event or a transmission system emergency event, the Company will take the steps required by the plans and procedures listed in the Plan Components section below. If such emergency event reaches the stage where the Company is directed to take, or begins to take, actions to preserve firm load, then it will, as soon as practical, notify the Commission's Staff of the occurrence of the event and the steps being taken.

B. PLAN COMPONENTS

1. Plans and Procedures - The Company will comply with the following:
 - (a) MISO's Market Capacity Emergency Operating Procedure;
 - (b) NERC's Emergency Operations Procedure;
 - (c) NERC's Emergency Preparedness and Operations Procedure;
 - (d) the Ameren Capacity and Emergency Plan;¹ and
 - (e) the Ameren Load Reduction Procedure.²
2. System Status Levels of Operating Conditions - The Company will utilize MISO's color-coded System Status Levels, which are based on the severity of the impact of the emergency to the bulk electric system, as a tool to prepare for emergencies.
3. Defined Essential Services - If interruption of circuits becomes necessary to address an emergency, the Company will first interrupt circuits that are not critical for the operation of the system or that do not serve critical loads. Critical loads consist of the following:
 1. Certain ambulatory health care, hospital services, and *nursing homes (*that provide medical care in a clinical setting);
 2. Defense communication network centers;
 3. Civil defense facilities;
 4. Prisons;
 5. Police, fire control, and first responder facilities that operate full-time;
 6. Potable water supply;

¹ Items (a) - (d) are available by accessing Ameren Missouri's tariffs available at www.ameren.com/missouri. Item (e) contains energy infrastructure information critical to system operation that is not available to the public due to safety and security considerations on the bulk power system.

² Items (d) and (e) are required by NERC, and have been reviewed and approved by the Reliability Coordinator.

DATE OF ISSUE June 9, 2022 DATE EFFECTIVE July 9, 2022ISSUED BY Mark C. Birk Chairman & President St. Louis, Missouri
NAME OF OFFICER TITLE ADDRESS

M.O.P.S.C. SCHEDULE NO. 6

1st Revised

SHEET NO. 146

CANCELLING M.O.P.S.C. SCHEDULE NO. 6

Original

SHEET NO. 146

APPLYING TO

MISSOURI SERVICE AREA

- 7. Natural gas transmission;
- 8. Sewage treatment;
- 9. Transportation hubs, such as airports and bus depots;
- 10. Registered heating/cooling centers.

If interruption of circuits that do not serve critical loads is insufficient to address the emergency, the Company shall have the discretion to interrupt circuits that serve critical loads to the extent necessary to address the emergency.

- 4. Additional Emergencies - In the event the Company determines that an emergency affecting its system, that has not been declared by the Reliability Coordinator, exists or is imminent and, in its role as the Local Balancing Authority, the Company will take such actions as deemed necessary and practical in the judgment of its system operations personnel to address such an emergency. The notice requirements of the Plan shall apply to such Company actions the same as if an event had been declared by the Reliability Coordinator.

DATE OF ISSUE June 9, 2022

DATE EFFECTIVE July 9, 2022

ISSUED BY Mark C. Birk
NAME OF OFFICER

Chairman & President
TITLE

St. Louis, Missouri
ADDRESS

M.O.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 147CANCELLING M.O.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 147APPLYING TO MISSOURI SERVICE AREA**GENERAL RULES AND REGULATIONS****VIII. EMERGENCY ENERGY CONSERVATION PLAN (Cont'd.)****C. CUSTOMER NOTIFICATION**

The Company will provide notice to its customers of steps taken pursuant to the Plan when the severity of the emergency rises to the level of public appeals for energy conservation. Notice will be provided by appropriate releases to the news media and, to the extent practical and in accordance with procedures deemed appropriate by the Company, by direct contact (telephonic, written or personal) with its large commercial and industrial customers.

D. DAILY MONITORING

Upon direction from the Reliability Coordinator to take steps under the Plan as outlined above, the Company will follow the direction of Reliability Coordinator to continue taking such steps or such additional steps as it is directed to take consistent with applicable procedures and plans. The Company will notify the Commission's Staff when the event for which the Company provided notice pursuant to subsection A or subsection B.4 is concluded, and will notify its customers to the extent they had previously been advised that steps under the Plan were being taken.

E. LIABILITY OF COMPANY

~~The Disruptions in service consistent with this Emergency Conservation Plan shall not be considered inconsistent with the Company's~~ Continuity of Service obligation provisions contained in the General Rules and Regulations, Section I. General Provisions at Paragraph J are incorporated herein.

F. PLAN MAINTENANCE

The Company shall review annually the Company procedures or plans required by the Reliability Coordinator or by NERC procedures and if revised, will submit the revised procedures or plans to the Reliability Coordinator as required for NERC compliance. After Reliability Coordinator review is complete, the Company will provide the revised procedures or plans to the Commission's Staff and the Office of the Public Counsel.

G. DEFINITIONS

Reliability Coordinator: the Midcontinent Independent System Operator, Inc. ("MISO").

NERC: the North American Electric Reliability Corporation.

Local Balancing Authority: the Company, under the terms of the MISO Transmission Owners Agreement.

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MO.P.S.C. SCHEDULE NO. 6

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SHEET NO. 147

CANCELLING MO.P.S.C. SCHEDULE NO. 6

Original

SHEET NO. 147

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MISSOURI SERVICE AREA

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NAME OF OFFICER

Chairman & President
TITLE

St. Louis, Missouri
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Original

SHEET NO. 148

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Reserved for Future Use

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MO.P.S.C. SCHEDULE NO. 6

1st Revised

SHEET NO. 149

CANCELLING MO.P.S.C. SCHEDULE NO. 6

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SHEET NO. 149

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MO.P.S.C. SCHEDULE NO. 6

1st Revised

SHEET NO. 150

CANCELLING MO.P.S.C. SCHEDULE NO. 6

Original

SHEET NO. 150

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