

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

In the Matter of Union Electric Company)	
d/b/a Ameren Missouri Tariffs to Increase)	<u>File No. ER-2021-0240</u>
Its Annual Revenues for Electric & Gas)	
Services)	<u>File No. GR-2021-0241</u>

**AMEREN MISSOURI'S MOTION TO LATE FILE
POSITION STATEMENT ON NEWLY ADDED ISSUE**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), and for its request to late file an addition to its position statement, state as follows:

1. On December 7, 2021, the Staff of the Missouri Public Service Commission ("Staff") filed its *Motion to Amend List of Issues and Late-File Position Statement*.

2. That filing added Issue 22 J 3 and reads as follows:

Performance of a full study of the reasonableness of the calculations and assumptions underlying Rider B to be filed as part of the Company's direct filing in its next general rate case.

3. Ameren Missouri does not object to the late addition of this issue.

4. Ameren Missouri requests the Missouri Public Service Commission allow it to provide its Statement of Position on this newly added Issue.

5. In response to the newly added Issue, Ameren Missouri provides the following Statement of Position:

A study and any data retention associated with it is completely unnecessary for at least two reasons. First, Staff's claim that an appropriate level of substation costs were not allocated to the customers who receive the Rider B credit is plainly wrong. The Company's CCOSS allocated 14.8% of such costs to primary customers, which include all Rider B customers. The 3.73% number cited from Staff's convoluted analysis of certain data request responses and Rider B billing determinants has nothing to do with the allocation of appropriate costs to these customers and is contradicted by the Company's actual CCOSS. Second, the entire premise of Staff's suggestion that the Rider B credit should be eliminated unless a study is first done ignores the undeniable fact that by the customer investing in their own

substation – and allowing the Company to avoid making that investment – means that the cost to serve the Rider B customers is unquestionably lower than the cost to serve customers that did not make such an investment. This is true regardless of whether Staff's allocations of distribution revenue requirement are relied upon or if no shifts to revenue responsibility are ordered.

6. Ameren Missouri hereby submits its Position Statement for newly added 22 J 3 and asks the Missouri Public Service Commission to accept this filing out of time, as it was made as quickly as possible after Staff's filing.

WHEREFORE, Ameren Missouri respectfully requests that the Commission accept Ameren Missouri's Statement of Position on the newly added Issue 22 J 3, as set forth above.

Respectfully submitted,

/s/ *Jermaine Grubbs*

Jermaine Grubbs, MO Bar #68970

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on all parties in this case via electronic mail (e-mail) on this 8th day of December, 2021.

/s/ Jermaine Grubbs
Jermaine Grubbs