



2. Ameren Missouri appreciates the effort Staff has put into its draft rule. The Company suggests, however, that there is opportunity to continue this workshop and further refine the rule. The Company has several additional comments that Staff and the Commission may find helpful in optimizing the relevance and effectiveness of this rule, while avoiding unintentional consequences. In the more substantive and thorough response it currently has in process, the Company will have input on provisions of the rule including, but not limited to:

- Contracting requirement provisions such as:
  - Grandfathering of existing contracts
  - Interplay with existing and pending cost allocation manuals
  - Comparisons to other regulatory requirements such as NERC CIP<sup>1</sup>
- Customer affirmative consents such as:
  - How they are obtained
  - How they are retained
- Aggregation and anonymization of customer information such as:
  - Commission approvals required before provision of information for research projects by organizations such as EEI
  - Aggregation, anonymization, and reporting for internal analytics
- Privacy Policy issues such as:
  - How the policy is provided
  - What information and format is required
- Provision of customer information to federal, state, and local courts and governmental bodies such as:
  - Reporting requirements to the Commission
  - Expectations regarding laws, rules, orders, and subpoenas that are not under the utility's control

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<sup>1</sup> The provisions, in fact, are more restrictive in practice than NERC CIP-013 standards.

3. Ameren Missouri looks forward to continuing work on the proposed rule with Staff and other interested parties. With the continued examination and vetting of the proposal, the Company is confident the Commission will be presented with an industry-practicable rule that provides robust protections for customer-specific information in concert with existing and evolving laws and requirements.

WHEREFORE, for the foregoing reasons, Ameren Missouri asks that the Commission pursue Staff's first option in how to proceed with regard to the draft rule, and continue this working case with additional comments and working sessions with interested stakeholders.

Respectfully submitted,

UNION ELECTRIC COMPANY,  
d/b/a Ameren Missouri

*/s/ Paula N. Johnson*

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**Paula N. Johnson**, # 68963  
Senior Corporate Counsel  
Ameren Services Company  
P.O. Box 66149, MC 1310  
St. Louis, MO 63166-6149  
(314) 554-3533 (phone)  
(314) 554-4014 (fax)  
[AmerenMOService@ameren.com](mailto:AmerenMOService@ameren.com)

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been emailed to the parties of record on this 20<sup>th</sup> day of September, 2019:

*/s/ Paula N. Johnson* \_\_\_\_\_

Paula N. Johnson