

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

In the Matter of a Working Group )  
Docket for a Repository of Utility Actions )  
Related to Securing Funding from the )  
Infrastructure Investment and Jobs Act of )  
2021 and the Inflation Reduction Act of )  
2022 )

Case No. AW-2023-0156

**MOTION FOR ORDER DIRECTING STATUS REPORTS AND UPDATES  
REGARDING PLANS AND FUNDING FROM THE INFRASTRUCTURE  
INVESTMENT AND JOBS ACT OF 2021 AND THE INFLATION REDUCTION  
ACT OF 2022**

**COMES NOW** the Office of the Public Counsel (“OPC”) and for its *Motion for Order Directing Status Reports and Updates Regarding Plans and Funding from the Infrastructure Investment and Jobs Act of 2021 and the Inflation Reduction Act of 2022* states as follows:

1. By November, 2022, the federal government had allocated approximately \$920 billion to public utilities through passage of the Infrastructure Investment and Jobs Act of 2021 (“IIJA”) and the Inflation Reduction Act of 2022 (“IRA”). These bills directed federal funds towards modernizing U.S. infrastructure, accelerating the country’s transition towards clean energy, and fortifying the nation’s cybersecurity. However, Missouri’s investor-owned utilities (“IOUs”) had, at that point, provided no insight as to their plans to utilize these federal funds.

2. On November 10, 2022, the OPC filed the *Motion to Open Working Group Docket for a Repository of Utility Actions Related to Securing Funding from the Infrastructure Investment and Jobs Act of 2021 and the Inflation Reduction Act of 2022*. In this filing, the OPC asked the Commission to create a working group docket,

allowing IOUs to detail their plans to utilize the funds the IIJA and the IRA made available. Appendix A further requested that the Commission order IOUs to provide quarterly reports outlining “updates on the status of all projects and efforts related to” the IIJA and IRA.

3. On November 22, 2022, the IOUs supported the OPC’s motion to open a workshop docket on each company’s plans for IIJA and IRA funding options. However, the IOUs also stated that the OPC’s request for quarterly updates was very broad and, as such, requested a narrower scope for the requested status reports.

4. On November 30, 2022, the Commission ordered the working case. However, the PSC also stated that it “would be in a better position to decide what information should be provided by the utilities” after the presentations.

5. The initial workshop for the IOUs, government agencies, and community organizations to present plans and proposals for IRA and IIJA funding took place on April 21, 2023.

6. Through its November 30 filing, the Commission ordered that “[t]his case is established as a repository for documents and comments regarding the applicability of the Infrastructure Investment and Jobs Act of 2021 and the Inflation Reduction Act of 2022 to Missouri’s investor-owned utilities.”

7. Thus, the OPC would like to renew its request that the PSC order each IOU to provide any and all attempts to obtain federal funding through the IIJA and IRA, the IOU’s success at obtaining those funds, and each IOU’s plans to utilize the obtained funds. Specifically, each IOU must provide the following:

- a) the following information regarding each IOU's current and future applications for IIJA and/or IRA funding, organized by application:
- i) the IOU's reason or plan for the funds requested;
  - ii) the application's date;
  - iii) the application's status;
  - iv) the dollar amount requested;
  - v) if applicable, the dollar amount received; and
  - vi) any future applications the IOU plans to pursue.
- b) what, if any, feedback or guidance each IOU is waiting for the federal government to provide.

8. Finally, we encourage the Commission request each IOU submit any additional information regarding the company's pursuit of federal funding that the Commission, stakeholders, and the public at large deems relevant.

WHEREFORE, the Office of the Public Counsel respectfully requests the Commission undertake the actions described herein.

Respectfully submitted,  
OFFICE OF THE PUBLIC  
COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed,  
or hand-delivered to all counsel of record this fifteenth of August, 2023.

/s/ Anna K. Martin