

Missouri Public Service Commission

Respond Data Request

Data Request No.	0018
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	ER-2021-0240
Date Requested	4/8/2021
Issue	General Information & Miscellaneous - Other General Info & Misc.
Requested From	Geri Best
Requested By	Jeff Keevil
Brief Description	Calendars/Itineraries
Description	1) For the twelve months ending December 31, 2020, please provide all appointment calendars, appointment books, itineraries, agendas, etc. as maintained by each individual listed below on a daily basis. These items may be kept in paper form, Outlook or other computer program or any other means. Please provide this information for Warner Baxter, Warren Wood, Michael Moehn, Martin Lyons, Tom Byrne, Laura Moore, Gaye Suggett, and any other executive who charged time to work on legislative efforts (SB 564 for example). 2) For all individuals included in the response to part 1 above, please provide all time keeping entries and time sheets separately by month depicting all time charged below the line for lobbying related activities that occurred in the test year ending December 31, 2020. Lisa Ferguson (Lisa.ferguson@psc.mo.gov)
Response	An objection letter was sent from Jim Lowery to Jeff Keevil on April 19, 2021 regarding this data request.
Objections	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **ER-2021-0240** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Union Electric Company-Investor(Electric)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Union Electric Company-Investor(Electric)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security :	Public
Rationale :	NA

Missouri Public Service Commission

Data Request

Data Request No.	0153.1
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	ER-2021-0240
Date Requested	5/27/2021
Issue	General Information & Miscellaneous - Other General Info & Misc.
Requested From	Geri Best
Requested By	Jeff Keevil
Brief Description	R&D - Quantification

Description Please refer to the response to Staff Data Request No. 153. Please provide a cost benefit quantification for each of the projects included in the response. If no cost benefit analysis was performed, please explain why no cost benefit analysis exists and how Ameren Missouri determines that the benefits of the projects outweigh the costs. Requested by Jason Kunst (Jason.Kunst@psc.mo.gov)

Due Date 6/16/2021

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Security	Public
Rationale	NA

Missouri Public Service Commission

Data Request

Data Request No. 0212.1
Company Name Union Electric Company-Investor(Electric)
Case/Tracking No. ER-2021-0240
Date Requested 5/27/2021
Issue Expense - Miscellaneous A&G Expense
Requested From Geri Best
Requested By Jeff Keevil
Brief Description Call Center Cost Detail

Description For the period covering November 1, 2017 through September 30,2021,updating as information becomes available, please provide by month, by FERC account in excel spreadsheet format: a) The actual outsourced call center costs, separately for electric and gas and separately for Ameren Missouri and Ameren Services allocated to Ameren Missouri. Please provide all applicable allocation factors. b) The accrued outsourced call center costs, separately for electric and gas and separately for Ameren Missouri and Ameren Services allocated to Ameren Missouri. Please provide all applicable allocation factors. Paul Amenthor (Paul.amenthor@psc.mo.gov)

Due Date 6/16/2021

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Security Public
Rationale NA

Missouri Public Service Commission

Data Request

Data Request No.	0226.1
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	ER-2021-0240
Date Requested	5/27/2021
Issue	Rate Base - Other Rate Base Issues
Requested From	Geri Best
Requested By	Jeff Keevil
Brief Description	Versailles
Description	Please refer to the response to Staff Data Request No. 226. Please provide a copy of the executed contract for the sale of the Versailles facility. Requested by Jason Kunst (Jason.Kunst@psc.mo.gov)
Due Date	6/16/2021

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Security	Public
Rationale	NA

Missouri Public Service Commission

Data Request

Data Request No. 0226.2
Company Name Union Electric Company-Investor(Electric)
Case/Tracking No. ER-2021-0240
Date Requested 5/27/2021
Issue Rate Base - Other Rate Base Issues
Requested From Geri Best
Requested By Jeff Keevil
Brief Description Edina Facility

Description Please refer to the response to Staff Data Request No. 226. 1. Please provide a copy of any appraisals Ameren Missouri has for the old Edina facility. 2. Please provide all journal entries to record the retirement of the old Edina facility. 3. Were any employees moved to the new Edina facility from any other Ameren Missouri facilities? 4. Did any of the employees relocated to the new facility have their job titles or job duties changed? If yes please provide the former title and duties and the current title and duties. 5. Please provide a copy of all pictures Ameren Missouri has in its possession of the old Edina facility. 6. Did Ameren Missouri have an estimate of the costs that would have been necessary to renovate the old Edina facility to allow for trucks to be stored securely and out of the weather? If yes, please provide the reason and rationale for electing to relocate the facility rather than renovate the older facility. If not, please provide the reason that Ameren Missouri did not obtain an estimate. 7. Please provide a list of all repairs and upgrades that were needed at the old Edina facility. 8. Please provide a complete copy of the facility condition assessment for the old Edina facility or any other document that details the condition of the facility. Requested by Jason Kunst (Jason.Kunst@psc.mo.gov)

Due Date 6/16/2021

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Security Public
Rationale NA

Missouri Public Service Commission

Data Request

Data Request No. 0459
Company Name Union Electric Company-Investor(Electric)
Case/Tracking No. ER-2021-0240
Date Requested 5/18/2021
Issue General Information & Miscellaneous - Other General Info & Misc.
Requested From Geri Best
Requested By Jeff Keevil
Brief Description Ameren MO Legislative Actions - Fiber

Description 1. Please provide the house and senate bill number and a detailed description of the legislation that Ameren Missouri proposed in the Missouri legislature regarding Ameren's fiber optic network. 2. Please provide the legislative history of that proposed legislation during the past legislative session, including any committees the proposed bill passed. 3. Please provide all modifications proposed to the bill by legislators as well as what legislator/committee proposed the change. 4. Please provide a list and detailed description of each of the benefits, separately for customers and Ameren Missouri, if this proposed legislation passed. 5. Please list and explain in detail all effects of this proposed legislation on business operations if passed. 6. Please explain any changes in revenue, expense, and investment for Ameren Missouri if the proposed legislation passed. Include in this discussion any sharing of revenue, expense or investment by Ameren Missouri and its affiliates with any anticipated allocation factors and what those allocation factors are based upon. Lisa Ferguson (Lisa.ferguson@psc.mo.gov)

Due Date 6/7/2021

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Security Public
Rationale NA

Missouri Public Service Commission

Data Request

Data Request No. 0460
Company Name Union Electric Company-Investor(Electric)
Case/Tracking No. ER-2021-0240
Date Requested 5/18/2021
Issue General Information & Miscellaneous - Other General Info & Misc.
Requested From Geri Best
Requested By Jeff Keevil
Brief Description Ameren MO Legislative Actions - Securitization

Description 1. Please provide the house and senate bill number and a detailed description of the legislation that Ameren Missouri proposed in the Missouri legislature regarding securitization. 2. Please provide the legislative history of that proposed legislation in the past legislative session, including any committees the proposed bill passed. 3. Please provide all modifications proposed to the bill by legislators as well as what legislator/committee proposed the change. 4. Please provide a list and detailed description of each of the benefits, separately for customers and Ameren Missouri, if this proposed legislation passed. 5. Please list and explain in detail all effects of this proposed legislation on business operations if passed. 6. Please explain any changes in revenue, expense, and investment for Ameren Missouri if the proposed legislation passed. 7. Please list and describe what issues Ameren Missouri intended on utilizing securitization for, i.e. generating facility retirement, storm cost recovery, etc. and why securitization is the best tool for the issue. Lisa Ferguson (Lisa.ferguson@psc.mo.gov)

Due Date 6/7/2021

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Security Public
Rationale NA

Missouri Public Service Commission

Data Request

Data Request No. 0461
Company Name Union Electric Company-Investor(Electric)
Case/Tracking No. ER-2021-0240
Date Requested 5/18/2021
Issue Expense - Maintenance
Requested From Geri Best
Requested By Jeff Keevil
Brief Description Wind Generation Facilities

Description 1. Please provide the final purchase price by wind generation facility as well as a copy of each final executed purchase agreement/business transfer agreement (BTA). 2. Please provide a detailed description of the operations of each wind facility, including but not limited to the number of employees working at each facility, the cycle of maintenance, needed inventory levels for materials & supplies etc. 3. Please provide, separately for labor and non-labor and separately for operations and maintenance, by month, by FERC account the actual costs incurred by wind facility from each facility's in service date through September 30, 2021 as available. 4. Please provide the actual amount of inventory/materials & supplies levels at each facility, by month since each facility went into service through September 30, 2021 as available. 5. Please provide the number of employees hired for each wind facility. 6. For each employee, by wind facility, please provide the employee name, job title, job description, annual salary, annual incentive compensation, annual employee benefits by type, and annual pension & OPEB amount. Also provide each employee's date of hire. 7. For item six above, please indicate if any of the employees hired at each new wind facility were redeployed from other areas of Ameren Missouri, Ameren Services, or other Ameren Missouri affiliates business to each wind facility, if applicable. Please detail what location the employee was redeployed from and if their old position with the prior entity was re-filled 8. Please provide complete copies of all executed contracts regarding the operations and maintenance by facility, if any. 9. Please provide any forecasts or budgets for operations & maintenance, separately by labor and non-labor demonstrating planned annual costs that Ameren Missouri has for each facility. Lisa Ferguson (Lisa.ferguson@psc.mo.gov)

Due Date 6/7/2021

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**Security
Rationale**

Public
NA

Missouri Public Service Commission

Data Request

Data Request No. 0462
Company Name Union Electric Company-Investor(Electric)
Case/Tracking No. ER-2021-0240
Date Requested 5/18/2021
Issue Expense - Maintenance
Requested From Geri Best
Requested By Jeff Keevil
Brief Description Callaway Unplanned Outage

Description

1. Please provide a detailed narrative timeline discussion of the events leading up to and occurring subsequent to, and including the events causing, the unplanned outage at the Callaway Nuclear facility from the time of incurrence through its current status. Please continue to update this DR through September 30, 2021 as new information becomes available. Please include any discussion of how this unplanned outage is linked in any way to the latest refueling completed in November 2020, what the cause of the unplanned outage was, was the unplanned outage avoidable, how the outage was/is being rectified. 2. Please provide the amount of cost incurred by cost/cost type, separately for capital and expense and separately for labor and non-labor by month, by FERC account for all amounts that were incurred due to the unplanned outage at Callaway. 3. At the time of Ameren Missouri's response to this DR, when does Ameren Missouri anticipate that Callaway will return to full baseload generation? Please update this response as new information becomes available. 4. Does Ameren Missouri anticipate that the Callaway nuclear facility will return to normal generation levels? Or will generation levels be less or more than previous levels? Please explain in detail. 5. Has Ameren Missouri already and does Ameren Missouri anticipate in the future any increased level of scrutiny by the Nuclear Regulatory Commission (NRC)? Please list and explain each increased level of oversight, increased incurrence of fees or increased fee amounts. Indicate for how long Ameren Missouri expects each of these items to continue into the future. 6. Does Ameren Missouri anticipate the next refueling to occur during the time frame of the next planned outage/refuel or at a different/later date? Please explain. 7. Does Ameren Missouri anticipate any additional capital or expense to be incurred at a later time, subsequent to the Callaway facility being brought back online due to the outage? If yes, please explain in detail. Will the additional capital or expense be ongoing or one-time? Please explain in detail. 8. Has the unplanned outage at Callaway had any impact whatsoever on fuel expense and fuel inventory during the outage and going forward? Were any fuel rods affected by the outage? Please explain in detail with any anticipated capital and expense increases or decreases. Lisa Ferguson (Lisa.ferguson@psc.mo.gov)

Due Date 6/7/2021

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Security
Rationale

Public
NA

Missouri Public Service Commission

Data Request

Data Request No.	0465
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	ER-2021-0240
Date Requested	5/18/2021
Issue	General Information & Miscellaneous - Other General Info & Misc.
Requested From	Geri Best
Requested By	Jeff Keevil
Brief Description	Equity Issuance Costs

Description For the equity issuance costs incurred by Ameren/Ameren Missouri and proposed for inclusion in the cost of service, by Ameren Missouri witness Lansford for the wind generation facilities: 1. Please provide in detail, including all descriptions of different categories of costs and all related amounts, by month, by FERC account for the period of inception of the costs through September 30, 2021. 2. Please provide the time periods proposed by Ameren Missouri for the recovery of the equity issuance costs. 3. Is Ameren Missouri requesting rate base treatment and carrying costs associated with the equity issuance costs? If yes, please provide the rationale for the proposed rate base treatment and an explanation and quantification of any amount of carrying costs requested with all supporting calculations and all applicable allocation factors. Lisa Ferguson (Lisa.ferguson@psc.mo.gov)

Due Date 6/7/2021

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Security	Public
Rationale	NA

Missouri Public Service Commission

Data Request

Data Request No. 0486
Company Name Union Electric Company-Investor(Electric)
Case/Tracking No. ER-2021-0240
Date Requested 5/18/2021
Issue Rate Design - Class Cost of Service
Requested From Geri Best
Requested By Jeff Keevil
Brief Description TRANSFORMER,0037KVA,1PH,7200V

Description Please fully describe the operating characteristics and typical installations of "TRANSFORMER,0037KVA,1PH,7200V." For example, what is the typical input voltage and typical output voltage? What is the maximum continuous demand at which the transformer can safely operate? What is the maximum instantaneous demand at which the transformer can safely operate? Is the transformer typically mounted on a pole or a pad? What structures (such as brackets, covers, etc.) are necessary for each installation type? What protection devices are included in typical installations? What communication devices are included in typical installations? DR requested by Sarah Lange (sarah.lange@psc.mo.gov).

Due Date 6/7/2021

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Security Public
Rationale NA

Missouri Public Service Commission

Data Request

Data Request No. 0487
Company Name Union Electric Company-Investor(Electric)
Case/Tracking No. ER-2021-0240
Date Requested 5/18/2021
Issue Rate Design - Class Cost of Service
Requested From Geri Best
Requested By Jeff Keevil
Brief Description Non Unitized Account 1370002 AMI Meters Cost

Description Please describe the plant or activity associated with the \$24,525,990 cost for vintage 2020, Asset ID 37733333 in Account 1370002 Meters in the workpaper provided by Mr. Hickman. DR requested by Sarah Lange (sarah.lange@psc.mo.gov).

Due Date 6/7/2021

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Security Public
Rationale NA

Missouri Public Service Commission

Data Request

Data Request No.	0488
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	ER-2021-0240
Date Requested	5/18/2021
Issue	Rate Design - Class Cost of Service
Requested From	Geri Best
Requested By	Jeff Keevil
Brief Description	Land Easements in Account 1364000
See Attachment	
Description	See Attached Sarah Lange (sarah.lange@psc.mo.gov)
Due Date	6/7/2021

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Security	Public
Rationale	NA

Case Number ER-2021-0240

Please refer to the “Query Data” tab of Mr. Hickman’s workpaper. Please explain in detail the location of each of the following Easements as identified by asset ID, including whether it is located on a customer’s property and the name of the property owner and the name on the account associated with that property and the rate schedule on which service is taken. Please include a description of the utility property for which the easement was acquired – for example, the circuit name and description, or description of the device or other utility plant situated on or through the easement, and identify the customer or customers served by said plant. DR requested by Sarah Lange (sarah.lange@psc.mo.gov).

vintage	asset id	retirement unit	activity quan	activity cost
2008	6079818	Land-Easements	2	\$ 1,552,042
2007	5810012	Land-Easements	1	\$ 282,606
2014	31480096	Land-Easements	1	\$ 31,055
2005	5548970	Land-Easements	1	\$ 20,703
2014	31943777	Land-Easements	0	\$ 9,173
2008	6105914	Land-Easements	0	\$ 35,165
2005	5554237	Land-Easements	0	\$ 5,286
2008	6104168	Land-Easements	0	\$ 8,141
2006	5384060	Land-Easements	0	\$ 5,154

Missouri Public Service Commission

Data Request

Data Request No.	0489
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	ER-2021-0240
Date Requested	5/18/2021
Issue	Rate Design - Class Cost of Service
Requested From	Geri Best
Requested By	Jeff Keevil
Brief Description	Asset location and purpose
See Attachment	
Description	See Attached Sarah Lange (sarah.lange@psc.mo.gov).
Due Date	6/7/2021

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Security	Public
Rationale	NA

Case Number ER-2021-0240

Please refer to the “Query Data” tab of Mr. Hickman’s workpaper. Please explain in detail the location of each of the following assets as identified by asset ID, including whether it is the name on the account associated with the property and the rate schedule on which service is taken, if located on a customer’s property. Please include a description of the utility property – for example, the circuit name and description, or description of the device or other utility plant, and identify the customer or customers served by said plant. DR requested by Sarah Lange (sarah.lange@psc.mo.gov).

vintage	asset id	retirement unit	activity quan	activity cost	average cost
2005	1159775	SWITCH,DISCONNECT	1	\$ 3,749,154	\$ 3,749,154
2009	19484670	SWITCH,GANG-OPERATED,OVER 27,000V	1	\$ 1,210,642	\$ 1,210,642
2019	36315382	RECLOSER,14.4KV,1PHASE	1	\$ 791,661	\$ 791,661
2019	36315712	SWITCH,DISCONNECT,69KV	2	\$ 1,103,138	\$ 551,569
2019	38308211	RECLOSER,34KV,3PHASE	2	\$ 960,659	\$ 480,330
2019	37597222	SWITCHGEAR,PADMOUNT	1	\$ 474,077	\$ 474,077
2019	37763671	SWITCHGEAR,WALL,MOUNT	2	\$ 897,388	\$ 448,694
2006	3636641	SWITCH,GANG-OPERATED,OVER 27,000V	1	\$ 439,666	\$ 439,666
2018	36959622	SWITCHGEAR,WALL,MOUNT	2	\$ 848,488	\$ 424,244
2019	37091862	SWITCHGEAR,WALL,MOUNT	1	\$ 420,932	\$ 420,932
2017	32569871	RECLOSER,34KV,3PHASE	1	\$ 379,860	\$ 379,860
2008	7587100	SWITCH,GANG-OPERATED,OVER 27,000V	1	\$ 345,052	\$ 345,052

Missouri Public Service Commission

Data Request

Data Request No.	0490
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	ER-2021-0240
Date Requested	5/18/2021
Issue	Rate Design - Class Cost of Service
Requested From	Geri Best
Requested By	Jeff Keevil
Brief Description	Non Unitized Accounts 1365000, 1367000, and 1368000
See Attachment	
Description	See attached Sarah Lange (sarah.lange@psc.mo.gov)
Due Date	6/7/2021

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Security	Public
Rationale	NA

Case Number ER-2021-0240

Please describe the plant or activity associated with the nonunitized activity as indicated by vintage and asset ID. DR requested by Sarah Lange (sarah.lange@psc.mo.gov).

utility account	vintage	asset id	retirement un	activity quan	activity cost	average cost
1365000-Overhead Conductor & Device	2020	39271889	Non-Unitized	5	\$ 5,465,880	\$ 1,093,176
1367000-Undergrd Conductor & Device	2019	37441588	Non-Unitized	3	\$ 2,890,633	\$ 963,544
1365000-Overhead Conductor & Device	2020	39272370	Non-Unitized	5	\$ 4,274,166	\$ 854,833
1368000-Line Transformers	2020	37729230	Non-Unitized	2	\$ 1,468,028	\$ 734,014
1367000-Undergrd Conductor & Device	2020	39273558	Non-Unitized	5	\$ 3,230,760	\$ 646,152
1365000-Overhead Conductor & Device	2020	39556454	Non-Unitized	3	\$ 1,754,347	\$ 584,782
1365000-Overhead Conductor & Device	2020	39554348	Non-Unitized	3	\$ 1,540,521	\$ 513,507
1367000-Undergrd Conductor & Device	2020	39270900	Non-Unitized	2	\$ 910,441	\$ 455,221
1365000-Overhead Conductor & Device	2020	37732437	Non-Unitized	3	\$ 1,331,622	\$ 443,874
1367000-Undergrd Conductor & Device	2020	39271566	Non-Unitized	1	\$ 423,959	\$ 423,959
1367000-Undergrd Conductor & Device	2020	39559034	Non-Unitized	1	\$ 400,945	\$ 400,945
1365000-Overhead Conductor & Device	2020	39555664	Non-Unitized	2	\$ 765,245	\$ 382,623
1365000-Overhead Conductor & Device	2020	39272887	Non-Unitized	5	\$ 1,872,928	\$ 374,586

Missouri Public Service Commission

Data Request

Data Request No.	0491
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	ER-2021-0240
Date Requested	5/18/2021
Issue	Rate Design - Class Cost of Service
Requested From	Geri Best
Requested By	Jeff Keevil
Brief Description	Net Negative Activity Quantities
See Attachment	
Description	See Attached Sarah Lange (sarah.lange@psc.mo.gov)
Due Date	6/7/2021

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Security	Public
Rationale	NA

Case Number ER-2021-0240

Please explain how the following asset types as found in the workpaper of Mr. Hickman have a negative overall quantity. DR requested by Sarah Lange (sarah.lange@psc.mo.gov).

Row Labels	Sum of activity quar	Sum of activity cost
CABLE,OH,2,TRIPLEX	-2880	\$ (9,483)
CABLE,POWER,69KV,1-500K	-634	\$ (131,209)
CABLE,TRIPLEX,#2	-560	\$ 95,626
POLE,WOOD,52'	-44	\$ 1,942,253
POLE,WOOD,82'	-9	\$ 30,920
CABLE,OH,#2 QUAD	-7	\$ 386
RECLOSER,14.4KV,3PHASE	-3	\$ (6,861)
POLE,ALUMINUM,18' AND U	-1	\$ (8,243)

Missouri Public Service Commission

Data Request

Data Request No. 0492
Company Name Union Electric Company-Investor(Electric)
Case/Tracking No. ER-2021-0240
Date Requested 5/18/2021
Issue Rate Design - Class Cost of Service
Requested From Geri Best
Requested By Jeff Keevil
Brief Description third party leases

Description Please identify and describe all property within the distribution accounts that is leased or rented to another entity – for example, communication cables, or pole space. DR requested by Sarah Lange (sarah.lange@psc.mo.gov).
Due Date 6/7/2021

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Security Public
Rationale NA

Missouri Public Service Commission

Data Request

Data Request No. 0493
Company Name Union Electric Company-Investor(Electric)
Case/Tracking No. ER-2021-0240
Date Requested 5/18/2021
Issue Rate Design - Class Cost of Service
Requested From Geri Best
Requested By Jeff Keevil
Brief Description Minimum Distribution Study Total Cost

Description Please refer to the tab "364-Vandas" in Mr. Hickman's workpaper. Please identify the source of the values found in column K "Total Cost" and provide workpapers establishing their derivation. DR requested by Sarah Lange (sarah.lange@psc.mo.gov).

Due Date 6/7/2021

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Security Public
Rationale NA

Missouri Public Service Commission

Data Request

Data Request No. 0502
Company Name Union Electric Company-Investor(Electric)
Case/Tracking No. ER-2021-0240
Date Requested 5/25/2021
Issue Cost Recovery Mechanism - Renewable Energy Standard
Requested From Geri Best
Requested By Jeff Keevil
Brief Description RESRAM – Prudence Review - RECs

Description For the period of January 1, 2019 through December 31, 2020, please provide: For purchase of electrical energy from eligible renewable energy resources bundled with the associated RECs or for the purchase of unbundled RECs, the cost of the purchases, and an explanation of the source of the energy or RECs and the basis for making that specific purchase, including an explanation of the request for proposal (RFP) process, or the reason(s) for not using a RFP process, used to establish which entity provided the energy or RECs associated with the RESRAM. Nancy Harris (Nancy.Harris@psc.mo.gov)

Due Date 6/14/2021

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Security Public
Rationale NA

Missouri Public Service Commission

Data Request

Data Request No.	0505
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	ER-2021-0240
Date Requested	5/27/2021
Issue	Rate Base - Depreciation
Requested From	Geri Best
Requested By	Jeff Keevil
Brief Description	Depreciation workpapers
Description	Please provide the lead cards (Ids files) used in the depreciation study of Ameren's electric plant in excel or text format. The files should include inputs for audit, datlist, deprate, retrate, and salvage programs. Requested by Cedric Cunigan (cedric.cunigan@psc.mo.gov)
Due Date	6/16/2021

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Security	Public
Rationale	NA

Missouri Public Service Commission

Data Request

Data Request No. 0506
Company Name Union Electric Company-Investor(Electric)
Case/Tracking No. ER-2021-0240
Date Requested 5/27/2021
Issue Expense - Taxes - Property Taxes
Requested From Geri Best
Requested By Jeff Keevil
Brief Description Property Tax Appeals - Electric

Description 1. Is Ameren Missouri currently seeking an appeal of any property tax assessments made prior to January 1, 2019? If yes please provide the following: a) a complete description of the tax items being appealed b) the counties assessing the tax that is being appealed c) the amounts being appealed d) the status of the appeal and e) the anticipated outcome of the appeal and the date when an outcome is expected. 2. Is Ameren Missouri currently seeking an appeal of any property tax assessments made prior to or during calendar 2020? If yes please provide the following: a) a complete description of the tax items being appealed b) the counties assessing the tax that is being appealed c) the amounts being appealed d) the status of the appeal and e) the anticipated outcome of the appeal and the date when an outcome is expected. 3. Will Ameren Missouri seek an appeal of any property tax assessments made during calendar 2021? If yes, please provide the following: a) a complete description of the tax items being appealed b) the counties assessing the tax that is being appealed c) the amounts being appealed d) the status of the appeal and e) the anticipated outcome of the appeal and the date when an outcome is expected. 4. For items 1, 2 and 3 continue to update by month through September 30, 2021 Requested by Jason Kunst (Jason.Kunst@psc.mo.gov)

Due Date 6/16/2021

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Security

Public

Rationale

NA

Missouri Public Service Commission

Data Request

Data Request No. 0507
Company Name Union Electric Company-Investor(Electric)
Case/Tracking No. ER-2021-0240
Date Requested 5/27/2021
Issue Revenue - Other Revenue Issues
Requested From Geri Best
Requested By Jeff Keevil
Brief Description PAYS

Description Case number EO-2018-0211, the Unanimous Stipulation and Agreement, page 5 states the PAYS principal and 4% financing revenue will still come from a PAYS line item on participant bills as an offsetting revenue when setting base rates. Please provide the monthly revenue (separately for principal and 4% financing) amount collected on participant bills for the twelve months ending December 2020 and updated through April 2021. Kim Cox (Kim.Cox@psc.mo.gov)

Due Date 6/16/2021

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Security Public
Rationale NA

Missouri Public Service Commission

Data Request

Data Request No.	0508
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	ER-2021-0240
Date Requested	5/27/2021
Issue	Rate Base - Cash Working Capital
Requested From	Geri Best
Requested By	Jeff Keevil
Brief Description	Payroll Schedule
Description	Please provide a schedule of pay dates for Ameren Corporation managers and bargaining unit employees for the twelve months ending December 31, 2020. Requested by Jane Dhority (Jane.Dhority@psc.mo.gov)
Due Date	6/16/2021

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Security	Public
Rationale	NA

Missouri Public Service Commission

Data Request

Data Request No.	0509
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	ER-2021-0240
Date Requested	5/27/2021
Issue	Rate Base - Cash Working Capital
Requested From	Geri Best
Requested By	Jeff Keevil
Brief Description	Ceridian Outsource Documentation

Description	Please provide an executed contract, if any, as well as any invoices, stubs or other documentation for Ameren Missouri's use of Ceridian payroll services for its withholding and subsequent payment of payroll taxes for the twelve months ending December 31, 2020. Requested by Jane Dhority (Jane.Dhority@psc.mo.gov)
Due Date	6/16/2021

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Security	Public
Rationale	NA

Missouri Public Service Commission

Data Request

Data Request No.	0510
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	ER-2021-0240
Date Requested	5/27/2021
Issue	Rate Base - Cash Working Capital
Requested From	Geri Best
Requested By	Jeff Keevil
Brief Description	Employee Payroll Changes
Description	1) Please list, identify, and describe all changes in how employees are paid, separately for executive and contract labor, since December 31, 2019. 2) Please provide the exact dates when any such payroll changes took place. Requested by Jane Dhority (Jane.Dhority@psc.mo.gov)
Due Date	6/16/2021

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. ER-2021-0240 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company-Investor(Electric) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Union Electric Company-Investor(Electric) and its employees, contractors, agents or others employed by or acting in its behalf.

Security	Public
Rationale	NA

Missouri Public Service Commission

Data Request

Data Request No.	0511
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	ER-2021-0240
Date Requested	5/27/2021
Issue	Rate Base - Cash Working Capital
Requested From	Geri Best
Requested By	Jeff Keevil
Brief Description	Management Payroll
Description	Are executive or contract employees of Ameren Missouri and Ameren Services being prepaid? If yes, please provide all rationale and justification for prepayment of these employees. Requested by Jane Dhority (Jane.Dhority@psc.mo.gov)
Due Date	6/16/2021

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Security	Public
Rationale	NA

Missouri Public Service Commission

Data Request

Data Request No. 0513
Company Name Union Electric Company-Investor(Electric)
Case/Tracking No. ER-2021-0240
Date Requested 5/27/2021
Issue Rate Base - Cash Working Capital
Requested From Geri Best
Requested By Jeff Keevil
Brief Description Meter Read Schedules

Description Please provide monthly meter read schedule (start date and end date) for each cycle during the period, January 1, 2019 through December 31, 2020. Please describe in detail any changes that Ameren Missouri anticipates regarding the meter reading schedules that would occur subsequent to test year, if any. Requested by Jane Dhority (Jane.Dhority@psc.mo.gov)

Due Date 6/16/2021

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. ER-2021-0240 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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Security Public
Rationale NA

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 0104

Please provide, for FERC accounts 360-368, and 373, by account, the total investment, as well as the related total depreciation reserve, and the total of other offsets to ratebase including CIAC associated with each of the following: 1. Facilities operating at 600V or below; 2. Facilities operating between 601 Volt and 34 kV 3. Facilities operating above 34 kV but below 69 kV 4. Facilities operating above 69 kV but below 115 kV 5. Facilities operating above 115 kV. For each of the above, please provide as detailed records as are available as to what plant is included within each account in each category, and the associated dollar value. Please separately identify the property (and associated reserve and other offsets) for which CIAC or similar payments have been received or billed. Please separately identify the property (and associated reserve and other offsets) which ultimately serve only one customer. DR requested by Sarah Lange (sarah.lange@psc.mo.gov).

Due Date: 5/2/2021

RESPONSE

Prepared By: Tom Hickman
Title: Regulatory Rate Specialist
Date: 4/30/2021

The requested level of detail of investment, associated reserves, offsets including CIAC or other similar payments, and assets contained within these accounts which ultimately serve only one customer for FERC accounts 360-368 and 373 does not generally exist with the exception of project level voltages being provided on a certain subset of assets in the response to DR MPSC 0242. Please reference that DR for that detail. Please further reference the direct testimony of Ameren Witness Tom Hickman and the associated workpapers for relevant results of historic analysis utilized in allocating the referenced capital accounts to the various voltage classes included in Ameren's Class Cost of Service Study.

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 0104.1

Please refer to the presentation titled “Voltage Cost 2nd Meeting Powerpoint” that was attached to an Outlook meeting organized by Thomas Hickman, occurring on 6/26/2020, subject “2nd Cost by Voltage Stipulation Meeting.” Please refer to slide 6 and please provide all data as requested in DR 104 in the format of the “reasonable breakout,” referenced in the 6/26/2020 presentation. To the extent that assets serve a single customer, Staff understands that Ameren Missouri has not taken steps to identify those assets. DR requested by Sarah Lange (sarah.lange@psc.mo.gov).

RESPONSE

Prepared By: Tom Hickman
Title: Regulatory Rate Specialist
Date: June 3, 2021

The requested data is unavailable as analysis at the level of review of distribution plant allocators mentioned in the referenced PowerPoint presentation has not been completed to date.

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 0248

1. Please provide the day to day report Ameren Missouri electric utilizes that reflects customers' bill collection patterns. Please provide Staff copies of this report for January 1, 2019 through September 30, 2021 as available. 2. Provide the data source that is used to develop the uncollectible percentage as used in the calculation of Ameren Missouri's electric collection lag. Data Request requested by Lisa Ferguson (Lisa.Ferguson@psc.mo.gov).

RESPONSE

Prepared By: Charlie Steib

Title: Sr Financial Specialist, Regulatory Accounting

Date: May 7, 2021

1. See attachment in MPSC 0164 in GR-2021-0241 ('MPSC 0164 Attach – Billing Report Downloads 201901 – 202008') for the day to day monthly bill payment report used in the collections lag analysis, as discussed in Mitch Lansford's direct testimony.

As a reminder, the daily data from the bill payment report used in the collections analysis was conservatively capped at 150 days. Due to the timing of filing, a rolling 12 months ended August 2020 was used in the lead lag study.

2. The bill payment report used in the collection lag analysis aggregates actual customer payments. Therefore, an adjustment for uncollectable was not used in the Company's collection lag calculation.

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 0283

For all costs charged to Ameren Missouri electric (direct and allocated) during the test year ending December 31, 2020, please provide the following information related to lobbying, working with lobbyists, meeting with legislators, providing support for those participating in lobbying activities and all other types of lobbying related activities of any kind whatsoever: a) the employee names, job titles, entity employed by and official job descriptions of each employee whose duties involved lobbying; b) For each employee on a separate basis, identified in item a) above, describe all lobbying activities that were performed including dates, locations and all other individuals identified by organization and job title that were involved. c) For each employee identified in item a) above, provide the total number of hours spent on each lobbying duty during the test year ending December 31, 2020 and the corresponding dollar amount of all pay and all related benefits. Data Request requested by Lisa Ferguson (Lisa.Ferguson@psc.mo.gov).

RESPONSE

Prepared By: Mitch Lansford
Title: Director Regulatory Accounting
Date: May 11, 2021

Please see attached and refer to the response to DR 0179 in File No. GR-2021-0241. These costs are not included in the revenue requirement as they are booked below the line in account 426.

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 0284

1) For each Ameren Missouri employee for whom at least a portion of his or her salary is attributed to lobbying efforts, please identify the following items separately, on an individual employee basis: a) the full dollar amount of the employee's salary, b) the dollar amount of the salary portion which was attributed to lobbying efforts, c) the FERC account or accounts to which the lobbying portion of the salary was charged, and d) the method or reasoning for determining item (b); if the allocation is based on a percentage, provide an explanation as to how the percentage was calculated or identified. 2) For each Ameren Services employee whose time is at least partially allocated to Ameren Missouri, for whom at least a portion of his or her salary is attributed to lobbying efforts, please identify the following items separately, on an individual employee basis: a) the full dollar amount of the employee's salary, b) the dollar amount of the salary portion which was attributed to lobbying efforts, c) the FERC account or accounts to which the lobbying portion of the salary was charged, and d) the method or reasoning for determining item b; if the allocation is based on a percentage, provide an explanation as to how the percentage was calculated or identified. Data Request requested by Lisa Ferguson (Lisa.Ferguson@psc.mo.gov).

RESPONSE

Prepared By: Mitch Lansford
Title: Director Regulatory Accounting
Date: May 11, 2021

Please refer to the response to Data Request MPSC 0283. Also refer to the responses to Data Requests MPSC 0179 and MPSC 0180 in File No. GR-2021-241.

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 0446

For the period of calendar 2020 through September 30, 2021, by month please provide: 1. The variable oil cents/mmBtu burned and the quantity of oil burned. 2. The variable gas cents/mmBtu by pipeline (i.e. MRT, NGP, PEPL, and TRKL); showing any basis & transportation adjustment by pipeline separately. Lisa Ferguson (lisa.ferguson@psc.mo.gov)

RESPONSE

Prepared By: Mark J. Peters

Title: Manager, Load Forecasting & Market Analysis

Date: June 3, 2021

1.

Year	Month	mmbtu	\$/mmbtu
Jan	2020	30,264.19	\$13.66
Feb	2020	12,587.76	\$12.85
Mar	2020	13,152.5	\$12.83
Apr	2020	3,834.88	\$10.88
May	2020	17,705.68	\$5.18
Jun	2020	6,916.97	\$11.22
Jul	2020	37,993.30	\$13.82
Aug	2020	11,735.22	\$11.22
Sep	2020	13,659.93	\$10.09
Oct	2020	9,058.42	\$10.35
Nov	2020	11,609.91	\$10.08
Dec	2020	29,406.41	\$10.73
Jan	2021	15,053.98	\$9.82
Feb	2021	108,482.58	\$15.84
Mar	2021	22,993.25	\$12.69
Apr	2021	37,756.46	\$12.17

2.

NGPL	P'ville/Kimmundy/Goose			
	Variable Including Capacity Release	Fixed	Total	Volume
JAN-20	\$ (93,927)	\$ 143,600	49,673	1,556
FEB-20	\$ (95,878)	\$ 143,600	47,722	1,455
MAR-20	\$ (95,009)	\$ 143,600	48,591	1,120
APR-20	\$ (4,447)	\$ 253,944	249,497	1,725
MAY-20	\$ 81,472	\$ 253,944	335,416	40,309
JUN-20	\$ 263,108	\$ 253,944	517,052	135,768
JUL-20	\$ 1,348,511	\$ 253,944	1,602,455	742,333
AUG-20	\$ 320,916	\$ 252,520	573,436	145,604
SEP-20	\$ 52,835	\$ 253,944	306,779	22,799
OCT-20	\$ 410,124	\$ 254,387	664,511	177,406
NOV-20	\$ (24,140)	\$ 143,600	119,460	8,097
DEC-20	\$ (18,762)	\$ 143,600	124,838	10,539
JAN-21	\$ (41,216)	\$ 143,600	102,384	1,544
FEB-21	\$ 79,713	\$ 143,600	223,313	9,029
MAR-21	\$ (42,503)	\$ 143,600	101,097	1,281

MRT	Venice/Meramec/			
	Variable Including Capacity Release	Fixed	Total	Volume
JAN-20	\$ 15,278	\$ 150,189	165,467	7,059
FEB-20	\$ 11,712	\$ 150,189	161,901	6,083
MAR-20	\$ -	\$ 150,189	150,189	-
APR-20	\$ 24,222	\$ 363,731	387,953	-
MAY-20	\$ -	\$ 193,386	193,386	-
JUN-20	\$ 423,650	\$ 193,386	617,036	231,317
JUL-20	\$ 1,193,449	\$ 193,386	1,386,835	603,320
AUG-20	\$ 692,197	\$ 193,386	885,583	277,121
SEP-20	\$ 157,583	\$ 193,386	350,969	73,722
OCT-20	\$ 95,650	\$ 193,386	289,036	38,204
NOV-20	\$ 10,279	\$ 193,386	203,665	4
DEC-20	\$ 10,113	\$ 193,386	203,499	3,728
JAN-21	\$ 38,068	\$ 193,386	231,454	13,575
FEB-21	\$ 2,259,806	\$ 193,386	2,453,192	75,257
MAR-21	\$ 654	\$ 193,386	194,040	-

Trunkline	Raccoon			
	Variable Including Capacity Release	Fixed	Total	Volume
JAN-20	\$ (7,735)	\$ 108,812	101,077	3
FEB-20	\$ (7,397)	\$ 101,906	94,509	-
MAR-20	\$ (7,735)	\$ 108,871	101,137	-
APR-20	\$ (3,285)	\$ 105,345	102,060	-
MAY-20	\$ (2,465)	\$ 108,884	106,419	-
JUN-20	\$ (4,380)	\$ 105,367	100,987	334
JUL-20	\$ 115,843	\$ 109,138	224,981	60,862
AUG-20	\$ 19,068	\$ 108,938	128,006	7,933
SEP-20	\$ (5,988)	\$ 108,538	102,549	-
OCT-20	\$ (11,538)	\$ 109,043	97,505	808
NOV-20	\$ (12,491)	\$ 105,881	93,390	-
DEC-20	\$ (5,794)	\$ 108,984	103,190	2,505
JAN-21	\$ (4,942)	\$ 108,939	103,997	-
FEB-21	\$ (3,069)	\$ 124,284	121,214	1,049
MAR-21	\$ (10,057)	\$ 108,810	98,753	-

PEPL	Peno Creek/Audrain			
	Variable Including Capacity Release	Fixed	Total	Volume
JAN-20	\$ (24,982)	\$ 93,767	68,785	508
FEB-20	\$ (23,149)	\$ 93,790	70,641	1,411
MAR-20	\$ (24,562)	\$ 130,093	105,531	692
APR-20	\$ (109,398)	\$ 539,473	430,075	3,171
MAY-20	\$ (107,567)	\$ 552,982	445,415	6,694
JUN-20	\$ (376)	\$ 537,684	537,308	77,494
JUL-20	\$ 597,397	\$ 557,994	1,155,391	284,111
AUG-20	\$ 194,641	\$ 555,526	750,167	96,477
SEP-20	\$ 90,197	\$ 537,213	627,410	11,028
OCT-20	\$ (221,519)	\$ 554,557	333,038	53,355
NOV-20	\$ 58,351	\$ 124,818	183,169	22,249
DEC-20	\$ (12,971)	\$ 130,013	117,042	691
JAN-21	\$ (2,862)	\$ 130,021	127,159	2,822
FEB-21	\$ 158,396	\$ 117,517	275,912	5,032
MAR-21	\$ 581	\$ 23,680	24,261	844

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 0447

1. Please separately list, describe and explain in detail each reason for why it would be inappropriate to normalize MISO Day 2 revenue and expense and transmission revenue and expense given the circumstances that over a period of time these expenses and revenues are fluctuating, with no clear trend, and when any changing underlying factors such as the income tax rate, removal of load that no longer exists, and underlying FERC ROE has been accounted for. 2. Please separately list, describe and explain in detail each underlying factor that would need to be accounted for when attempting to restate the historical levels for 2018, 2019, and 2020 for MISO Day 2 and Transmission revenue and expense in order for those years to be comparable (other than the lower income tax rate, removal of non-recurring load, and the lower FERC ROE). 3. If historical 2018, 2019, and 2020 MISO Day 2 and Transmission revenue and expense data is adjusted for the income tax rate change, removal of non-recurring load, and the lower FERC ROE would this historical data then be comparable to 2021 data? If not, please list, describe and explain in detail each reason Ameren Missouri has relied upon for this response. 4. Please separately list, describe and explain each reason supporting why it would be appropriate to include an amount in the revenue requirement using true-up data if comparable historical data showed a fluctuation in costs or costs were trending up/down but the data in the true-up period signaled otherwise. 5. Please separately list, describe and explain in detail each reason for why MISO Day 2 revenue and expense as well as transmission revenue and expense should be approached differently than all of Ameren Missouri's other revenue and expense when setting an ongoing level. (I.e. if the cost or revenue fluctuates then use a historical normalization and if it is trending up or down – use last known or set a new level based on new costs or new underlying information such as the revenue or expense being developed a different way) 6. For each and every MISO revenue and expense schedule and Transmission Revenue and Expense schedule, please separately list, describe, explain and provide all rationale explaining why Ameren Missouri believes it is inappropriate to normalize those items and that only true-up values are appropriate. Lisa Ferguson (lisa.ferguson@psc.mo.gov)

RESPONSE

Prepared By: Mitch Lansford
Title: Director Regulatory Accounting
Date: June 3, 2021

Subject to the Company's objection:

1. The analyses necessary to provide “each reason” does not exist and therefore the Company cannot provide the list, description, or explanation.
2. The analyses necessary to “describe and explain each underlying factor” does not exist and therefore the Company cannot describe or explain such factors.
3. The Company cannot answer the question in the absence of conducting an analysis that has not been done.
4. The Company cannot answer the question in the absence of conducting an analysis that has not been done.
5. The premise of the question is false in that the revenues and expenses that are the subject of this DR are not “approached differently” than the majority of revenues and expenses used to develop the revenue requirement in this case. Therefore, an answer is not possible.
6. The Company cannot answer the question in the absence of conducting an analysis that has not been done.

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 0473

Please reconcile Ameren Missouri's position on what the Time of Use Tracker is designed to address, as proposed by Ameren Missouri witnesses Steven Wills and Ahmad Faruqui in their direct testimonies. Ameren Missouri witness Wills references the term "lost fixed costs" while witness Faruqui refers to "decoupling," "lost revenue adjustment mechanism (LRAM)" and "...build in an estimate of revenue loss..." into rates. Please define and explain each of the terms referenced above in quotations and explain how each of the terms will be used in practice under Ameren Missouri's proposal. Lisa Ferguson (Lisa.ferguson@psc.mo.gov)

RESPONSE

Prepared By: Steven M. Wills
Title: Director, Rates & Analysis
Date: June 4, 2021

My testimony and Dr. Faruqui's testimony both support the use of a tracker mechanism to make the Company (and customers, in the event of any revenue increase, as the request is for a two-way tracker) whole for the revenue changes directly resulting from customers' adoption of Time of Use rates. Note Dr. Faruqui's statement at page 14, lines 1-2 of his direct testimony: "Of all these mechanisms, a tracker is the most appropriate for Ameren Missouri."

Dr. Faruqui's reference to LRAM, decoupling, and building in an estimate of revenue loss are simply references to other approaches that can be, and have been in other jurisdictions, used to accomplish the same goal.

Decoupling refers to a framework where the actual revenues of a utility are periodically trued-up to some pre-established target revenue level in order to break the link between observed sales and company revenues. This also serves to break the link between savings that arise from successful management of energy bills for customers on TOU rates and company revenues.

A lost revenue adjustment mechanism refers to a rate mechanism that periodically calculates lost revenues that may arise from changes in usage (including changes in the time of use when the customer is subject to TOU rates) and recovers those losses through a specific charge applicable

to all customers' bills. This is analogous to the Company's recovery of the Throughput Disincentive under Rider EEIC, which is specifically authorized by Missouri statute in the circumstance of energy efficiency programs.

Building an estimate of revenue loss into rates refers to a practice of adjusting (reducing) the billing units in a rate case based on an expectation of revenue losses that will occur when rates go into effect and customers select rates under which they will be able to lower their bills. This, in effect, "grosses up" the rates for expected revenue losses, such that, when customers do manage their bills and save money, the actual revenues better match the revenue requirement that was originally established in the rate case. While this approach would be feasible in Ameren Missouri's case, the Company did not choose to pursue this method because the limited amount of AMI data available, and the minimal experience with which to assess the actual pace at which customers adopt new rates, would require estimates of expected revenue loss that have a relatively large amount of uncertainty at this time, whereas the examples Dr. Faruqui gave of utilities in Arizona and Colorado have more information on which to build those estimates into their rate calculations due to the maturity of their AMI systems and maturity and/or predictability of TOU rate adoption.

In practice, Ameren Missouri proposes to utilize only the tracker mechanism. For purposes of the tracker, residential customers adopting the Overnight Savers, Smart Savers, or Ultimate Savers rates would have their bills calculated on the rate they selected and also on the legacy standard (Anytime User) rate. The difference between the bills would be accumulated in a regulatory asset (assuming the bills were lower on the TOU rate than on the standard rate – alternatively it would be accumulated in a regulatory liability). The regulatory asset (liability) would be amortized in the revenue requirement of a subsequent rate case. Similarly, for Rate 4(M) customers that transfer to Rate 11(M) due to the eligibility changes proposed in this case for the 11(M) tariff, the difference between their bill on the 11(M) rate as compared to what the bill would have been on the 4(M) rate would be accumulated in a regulatory asset (or liability if the 11(M) revenues were higher).

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 0525

Please provide the ADIT calculation, in electronic format with all formulas intact, for the Meramec generating facility for the amount being utilized in Company's proposed tracking mechanism. Please calculate the ADIT by month through the operation of law date in the current case (February 28, 2022). DR requested by Lisa Ferguson (lisa.ferguson@psc.mo.gov).

RESPONSE

Prepared By: Mitch Lansford
Title: Director Regulatory Accounting
Date: June 11, 2021

Please see the response and attachment for Data Request MPSC 0454. No further projection or analysis of this amount exists.

Missouri Public Service Commission

Data Request

Data Request No.	0533
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	ER-2021-0240
Date Requested	6/4/2021
Issue	Rate Design - Class Cost of Service
Requested From	Geri Best
Requested By	Jeff Keevil
Brief Description	Facility Extension Scenarios
See Attachment	
Description	Please see attached. Sarah Lange (sarah.lange@psc.mo.gov)
Due Date	6/24/2021

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. ER-2021-0240 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company-Investor(Electric) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Union Electric Company-Investor(Electric) and its employees, contractors, agents or others employed by or acting in its behalf.

Security	Public
Rationale	NA

Consider the following hypothetical customers. For each, please provide an itemized construction estimate including a detailed list of the specific materials that would be expected to be used for that circumstance, the current cost of those materials, and the expected installation cost of those materials. Please identify those materials with labeling or reference numbers consistent with the descriptions used in the continuing property catalog.

1. A 3000 sq ft house with no gas or propane, located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

2. A 1000 sq ft house with propane located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

3. A 3000 sq ft house with no gas or propane, located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

4. A 1000 sq ft house with propane located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

5. A 5000 sq ft commercial office with no gas or propane, located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

6. A 1000 sq ft commercial office with propane located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

7. A 5000 sq ft commercial office with no gas or propane, located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

8. A 1000 sq ft commercial office with propane located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

9. A 1 MW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

10. A 1 MW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

11. A 5 MW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

12. A 5 MW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

13. A 10 MW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

14. A 10 MW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

15. A 20MW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

16. A 20MW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

17. A 25 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

18. A 25 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

19. A 50 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

20. A 50 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

21. A 75 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

22. A 75 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

23. A 100 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

24. A 100 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

25. A 200 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

26. A 200 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

27. A 500 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

28. A 500 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

29. A 750 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

30. A 750 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

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