Exhibit No.:

Issues: Rate Design

Class Cost-of-Service

Witness: Michael S. Scheperle

Sponsoring Party: MO PSC Staff

Type of Exhibit: Direct Testimony

Case No.: ER-2014-0258

Date Testimony Prepared: December 19, 2014

Filed

March 23, 2015 Data Center Missouri Public

Service Commission

MISSOURI PUBLIC SERVICE COMMISSION

REGULATORY REVIEW DIVISION

DIRECT TESTIMONY

OF

MICHAEL S. SCHEPERLE

UNION ELECTRIC COMPANY D/B/A AMEREN MISSOURI

FILE NO. ER-2014-0258

Jefferson City, Missouri December 2014

Staff Exhibit No. 232

Date 2-23-15 Reporter 45

File No. FR-2014 0258

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Union Electric Comp d/b/a Ameren Missouri's Tariff Increase Its Revenues for Electric Serv	to) Case No. ER-2014-0258	3		
AFFIDAVIT OF MICHAEL S. SCHEPERLE				
STATE OF MISSOURI)) ss COUNTY OF COLE)				
the preparation of the following D consisting of 1 pages of Direct Te answers in the following Direct Testin	l age, on his oath states: that he has participated Testimony in question and answerstimony to be presented in the above case nony were given by him; that he has know and that such matters are true to the be	ver form, e, that the wledge of		
	Michael Schople Michael S. Scheperle	ele		
Subscribed and sworn to before me this	s 1911/2 day of December, 2014.			
SUSAN L. SUNDERMEYER Notary Public - Notary Seal State of Missouri Commissioned for Callaway County My Commission Expires: October 28, 2018 Commission Number: 14942086	Susan Sundern Notary Public	neger		

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OF
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UNION ELECTRIC COMPANY D/B/A AMEREN MISSOURI
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DIRECT TESTIMONY

OF

MICHAEL S. SCHEPERLE

UNION ELECTRIC COMPANY D/B/A AMEREN MISSOURI

FILE NO. ER-2014-0258

- Q. Please state your name and business address.
- A. My name is Michael S. Scheperle and my business address is Missouri Public Service Commission, P. O. Box 360, Jefferson City, Missouri 65102.
 - Q. Who is your employer and what is your present position?
- A. I am employed by the Missouri Public Service Commission ("Commission") and my title is Manager, Economic Analysis Section, Energy Unit, Utility Operations, Regulatory Review Division.

CREDENTIALS

- Q. What is your educational background and work experience?
- A. I completed a Bachelor of Science degree in Mathematics at Lincoln University in Jefferson City, Missouri. I have been employed by the Missouri Public Service Commission since June 2000. Prior to joining the Commission, I was employed at United Water Company as a Commercial Manager from 1983 to 2000, and at Missouri Power & Light Company from 1973 to 1983 as a Customer Service Representative and as a Supervisor of Rates, Regulations and Budgeting. A list of the cases in which I have filed testimony/reports before the Commission is shown on Schedule MSS-D1. I moved to the Economic Analysis section as a Regulatory Economist III in 2008. I assumed my current position in 2009. My duties consist of directing Staff within the Economic Analysis Section,

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analyzing rate case activity, reviewing tariffs, and making recommendations based upon my evaluations and the evaluations performed by the Economic Analysis section. My previous testimony and responsibilities address topics including class cost of service, rate design, rate case coordinator, telecommunication issues, complaint cases, Missouri Universal Service Fund, energy efficiency/demand-side management, a Staff member of the Missouri-Deaf-Relay Committee, and a member of the Commission Staff's Electric Meter Variance Committee.

EXECUTIVE SUMMARY

- Q. What are Staff's revenue requirement recommendations to the Commission for Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") in this case?
- A. The Staff's recommended increase in revenue requirement is based upon an adjusted test year for the twelve months ending March 31, 2014, including true-up estimates through December 31, 2014. Also, additional information through January 1, 2015, is considered for inclusion in the cost of service during the true-up audit agreed to by the parties and ordered by the Commission. The Staff's recommended revenue requirement increase for Ameren Missouri is \$97,685,095 to \$128,594,790 based on a return on equity ("ROE") range of 9.00% to 9.50%.

The Staff's revenue requirement as presented in its Accounting Schedules filed December 5, 2014, includes expected changes for a true-up ending December 31, 2014, based on current information. The Staff is not now adopting for the purpose of setting Ameren Missouri's rates the items listed and quantified in the Staff's true-up estimate. The Staff has included these items as placeholders, pending the Staff's completion of its true-up audit.

Order Adopting Procedural Schedule, Establishing Test Year, and Delegating Authority, effective August 20, 2014.

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Q. What are Staff's rate design recommendations to the Commission for Ameren Missouri in this case?

A. Ameren Missouri has eight (8) active service classifications. The service classifications² are (1) residential ("Res"), (2) small general service ("SGS"), (3) large general service ("LGS"), (4) small primary service ("SPS"), (5) large primary service ("LPS"), (6) large transmission service ("LTS"), (7) three street and outdoor area lighting tariff groups, and (8) the Metropolitan St. Louis Sewer District ("MSD") classification.³ Staff combined the LGS and the SPS rate classifications for purposes of its class cost-of-service ("CCOS") study because both rate schedules serve non-residential customers with billing demands of at least 100 kilowatts. Therefore, a customer may choose to take service at secondary voltage level under the LGS rate schedule or at a primary voltage level under the SPS rate schedule. Also, the rate structures of the LGS and SPS classes are identical, except that the rate levels on the SPS rate schedule have been adjusted for the loss differential between primary and secondary voltages and to account for customer provisions of voltage transformation equipment. Additionally, Staff included the MSD rate class provision in its SGS class as the MSD only includes limited pumping station activity along the Mississippi River Levee. As explained in its CCOS Report, Staff recommends that the allocation of any rate increase for Ameren Missouri that is ordered will be accomplished with a six-step process:

1. Based on CCOS results, Step 1 is to increase/decrease the current base retail revenue on a revenue-neutral basis to various classes of customers. The Ameren Missouri Res class should receive a positive 0.50% adjustment, the LTS class should receive a

² Rate schedules for Residential 1(M), Small General Service 2(M), Large General Service 3(M), Small Primary Service 4(M), Street & Outdoor Area Lighting – Company Owned 5(M), Street & Outdoor Area Lighting – Customer-Owned 6(M), Municipal Street Lighting - Incandescent 7(M), Large Primary Service 11(M), Large Transmission Service 12(M), and the Metropolitan St. Louis Sewer District.

³ Electric service Agreement dated November 22, 1961, between the Union Electric Company and the United States Army Corps of Engineers.

positive 0.50% adjustment, and the classes of customers (SGS, LGS/SPS) should receive a negative adjustment of approximately 0.63%.

- 2. Step 2 is to assign directly to applicable customer classes the portion of the revenue increase/decrease that is attributable to energy efficiency ("EE") programs from Pre-MEEIA ("Missouri Energy Efficiency Investment Act") program costs. The Pre-MEEIA program costs consist of the program costs for increases/decreases in the revenue requirement associated with the amortization of Pre-MEEIA program costs.
- 3. Step 3 is to determine the amount of revenue increase awarded to Ameren Missouri that is not associated with the EE revenue from Pre-MEEIA revenue requirement assigned in Step 2, by subtracting the total amount in Step 2 from the total increase awarded to Ameren Missouri. This amount will be allocated to customer classes as an equal percent of current base revenues after making the adjustment in Step 1.
- 4. Step 4 recommends that the Commission should order Ameren Missouri's rate schedules to be uniform for certain interrelationships among the non-residential rate schedules that are integral to Ameren Missouri's rate design. The following features are uniform and should remain uniform: (a) the value of the customer charge will be uniform across rate schedules, with the customer charge on the SPS, LPS, and LTS rate schedules being the same; (b) the rates for Rider B voltage credits will be the same under all applicable rate schedules; (c) the rate for the Reactive Charge will be the same for all applicable rate schedules; and (d) the rate associated with Time-of-Day meter charge will be the same for all applicable non-residential rate schedules (LGS, SPS, LPS, and LTS).
- 5. Step 5 recommends that, based on CCOS results, the residential customer charge rate remain at the current charge of \$8.00 per month.
- 6. Step 6 recommends that each rate component of each class be increased across-the-board for each class on an equal percentage basis after consideration of steps 1 through 5 above.
- 7. Ameren Missouri proposes a residential low-income exemption for EE charges relating to MEEIA. Ameren Missouri's testimony outlines that the low-income exemption may save some low-income customers nearly \$4.50 per month. The Staff is not opposed to the concept of a low-income exemption for qualified residential customers as defined in MEEIA statute 393.1075, RSMo. This means low-income residential customers will be exempt from Rider EEIC charges. Ameren Missouri's proposal does not have a revenue requirement impact in this current case but would allow for the concept in the next Rider Energy Efficiency Investment Charge ("EEIC") filing.

⁴ Direct Testimony of William R. Davis on behalf of Ameren Missouri, page 21.

⁵ Subsection 6 states: "The commission may reduce or exempt allocation of demand-size expenditures to low income classes, as defined in an appropriate rate proceeding, as a subclass of residential service."

8. Adopt Rider Fuel and Purchased Power Adjustment Clause ("FAC") tariff sheets consistent with Staff CCOS Report.

9. To address Commission questions related to *Order Directing Consideration of a Certain Rate Design Question*. The Commission is interested in obtaining information and analysis as to whether rate design mechanisms should be established to promote stability or growth of customer levels in geographic locations where there is underutilization of existing infrastructure. Additionally, the Commission outlined nine additional questions which Staff addresses.

PURPOSE OF DIRECT TESTIMONY

- Q. What is the purpose of your direct testimony?
- A. The purpose of this testimony is to sponsor the Staff's recommendation in its Rate Design and Class Cost-of-Service Report ("CCOS Report") that is being filed concurrently with this direct testimony. The "report" approach to the case filing minimizes the number of Staff witnesses required to file direct testimony and provides a clearer presentation of the overall revenue requirement and rate design. I also provide in this direct testimony an overview of Staff's recommendations detailed in its CCOS Report.
 - Q. What does the CCOS Report entail?
- A. The CCOS Report presents Staff's updated CCOS study for Ameren Missouri and provides methods to collect a Commission-ordered increase in Ameren Missouri's overall revenue requirement. Staff relied on the CCOS study results presented in the CCOS Report as the basis for Staff's rate design recommendations. The CCOS report presents Staff rate design recommendation that there should be overall company revenue-neutral shifts in class revenue responsibility to move certain classes closer to the cost of serving that class. The CCOS study is based on Staff's allocation methods, Staff's accounting data, and Staff's revenue requirement recommendation at the midpoint rate of return. Staff's revenue requirement recommendation is found in Staff's Accounting Schedules filed on

December 5, 2014. Several members of the Commission Staff had specific assignments relating to different components of the CCOS Report, and are individually responsible for those calculations. In this direct testimony, I provide an overview of the work performed in this case by members of the Utility Operations Department, Regulatory Review Division. Also, the CCOS Report recommends changes to the Rider FAC tariff sheets; discusses a residential low-income MEEIA exemption; discusses a residential time-of-day pilot program and addresses Commission questions related to the *Order Directing Consideration of a Certain Rate Design Question*.

- Q. Is this the entire filing being made by Staff for this case?
- A. No. Staff's Cost of Service Revenue Requirement Report ("COS Report") was filed on December 5, 2014.
- Q. What relationship, if any, is there between the Staff's COS Report filed December 5, 2014, and the Staff's CCOS Report?
- A. In its COS Report, Staff filed its accounting information, which included Staff's estimate of Ameren Missouri's revenue requirement through the true-up cut-off date of December 31, 2014. These estimates will be replaced with actual amounts following the true-up as authorized by the Commission. For its direct filing, the Staff has determined Ameren Missouri's revenue requirement with the end of the test year established for this case, March 31, 2014, and estimated amounts through the true-up cut-off date, December 31, 2014. The matching principle is designed to keep revenues, expenses and rate base in a proper relationship for a set period of time. Employing a test period helps implement the matching principle by providing the Commission a common basis for considering utility revenues and expenses over an annual period, so that rates going forward will maintain the same balanced

	Michael S. Scheperle					
relat	ionship. Consistent with that COS Report, this CCOS Report reflects the Staff's revenue					
requ	requirement increase recommendation of \$113,139,943 (mid-point) based on Staff's estimate					
thro	through the true-up cut-off date.					
STA	STAFF RATE DESIGN AND CCOS REPORT					
	Q.	How is the Staff's CCOS Report organized?				
	A.	A. The Report is organized by topic as follows:				
		I.	Executive Summary			
		II. Class Cost-of-Service and Rate Design Overview				
		III. Class Cost-of-Service Study				
		IV.	Rate Design			
		V.	Fuel and Purchased Po Recommendations	ower Adjustment Clause Tariff Sheet		
		VI.	Residential Low-Income M	EEIA Exemption		
		VII.	Residential Time-of-Day Pi	lot		
		VIII.	Residential Customer Charg	ge		
		IX.	Addresses Commission q Consideration of a Rate De	uestions related to the Order Directing sign Question.		
	Q. Please identify the Staff expert responsible for addressing each area in the					
CCC)S Repor	t?				
	A. The Staff expert for each listed issue is as follows:					
	<u>Description</u>			Staff Expert		
	Executive Summary		ımmary	Michael Scheperle		
	Class Cost of Service Overview Class Cost of Service		Service Overview	Robin Kliethermes		
			Service	Robin Kliethermes, Sarah Kliethermes		
	Rate Design			Bradley Fortson		
	Fuel and Purchased Power Clause		chased Power Clause	Matt Barnes		

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Michael S. Scheperle 1 Residential Low-Income MEEIA Exemption Michael Stahlman 2 Residential Time-of-Day Pilot Michael Stahlman Robin Kliethermes 3 Residential Customer Charge 4 Order Directing Consideration of a 5 Rate Design Question Michael Scheperle, 6 Sarah Kliethermes. 7 Daniel Beck 8 **CLASS COST OF SERVICE STUDY** 9 How did Staff reach its CCOS recommendations to the Commission? Q. 10 A.

A. Staff's Accounting Schedules filed with Staff's COS Report show that an increase in Ameren Missouri's revenue requirement in the range of \$97,685,095 to \$128,594,790 is warranted. The COS Report shows that the mid-point of Staff's calculated return on equity range is \$113,139,943, an overall increase of 4.16%.

Staff used Ameren Missouri's rate schedules for the customer classes in its CCOS study. However, Staff combined the LGS and SPS rate classes for purposes of its CCOS study because both rate schedules serve non-residential customers with billing demands of at least 100 kilowatts (kW), therefore a customer may choose to take service at secondary voltage level under the LGS 3(M) rate schedule or at a primary voltage level under the SPS 4(M) rate schedule. Also, the rate structures of the LGS and SPS classes are identical, except that the rate levels on the SPS rate schedule have been adjusted for the loss differential between primary and secondary voltages, and to account for customer provision of voltage transformation equipment. Staff also combined Ameren Missouri's lighting rate schedules to create its Lighting class. Staff included the MSD rate provision in its SGS rate class. This consolidation resulted in Staff's six customer classes. The six customer classes are (1) Res, (2) SGS/MSD, (3) LGS/SPS, (4) LPS, (5) LTS, and (6) lighting service. For each of these six

Direct Testimony of Michael S. Scheperle

customer classes, Staff determined Ameren Missouri's investment to serve the customers in that customer class and Ameren Missouri's ongoing expenses to serve the customers in that customer class.

- Q. What are Staff's CCOS study results?
- A. Staff's CCOS study indicates that the following revenue adjustments would need to occur to exactly align each class's revenues with its cost of service: Res, +7.10%; SGS, +0.01%; LGS, -0.76%; LPS, +3.39 %; LTS, +14.84%; and Lighting +4.51%.
- Q. What shifts in revenue responsibilities between classes does Staff's CCOS study indicate should be made while keeping Ameren Missouri's overall revenue unchanged (i.e. on a revenue-neutral basis)?
- A. The revenue-neutral shifts can be determined by subtracting the overall 4.16% revenue increase from each class's required percentage change in revenues. On a revenue neutral basis, the following shifts should occur for each class: Res, +2.94%; SGS, -4.15%; LGS, -4.92%; LPS, -0.77%; LTS, +10.68% and Lighting +0.35%.
 - Q. What do the signs on the above percentages indicate?
- A. If the study shows that a negative percentage shift should occur for a class, it indicates that the class is collecting revenue in excess of the cost to serve the class and its rates should be reduced. If the study shows that a positive percentage shift should occur, it indicates that the class is not generating enough revenue to cover its costs and its rates should be increased.
- Q. Is Staff recommending that each class have its revenue responsibility shifted to exactly equal its cost of service?

- A. No. Because of the relative rate impacts, the Staff is not recommending a movement all the way to each class' cost of service.
 - Q. What is Staff's rationale for the revenue-neutral shifts it recommends?
- A. Staff believes that CCOS studies should serve as a guide to setting revenue requirements and thus are not precise. Staff's CCOS study revealed that, on a revenue-neutral basis, Ameren Missouri's current rates do not cover Ameren Missouri's cost to serve any customer class except the LGS/SPS class. Two of the customer classes are more than 6% below Ameren Missouri's cost (investment and expenses) to serve them, and four of the rate customer classes are less than 5% below Ameren Missouri's costs to serve them.
 - Q. How did Staff conduct its CCOS study?
- A. The CCOS Report outlines how Staff performed its CCOS study. The cost-of-service procedure involves three steps of Functionalization; Classification; and Allocation: (1) Functionalization this procedure identifies the different functional "levels" of the system; (2) Classification this procedure determines for each functional type, the primary cause or causes of that cost being incurred, and segregates these cost-of-service components into a customer, demand or energy component; and (3) Allocation this procedure allocates the class proportional responsibilities for each type of cost and spreads the cost among the various classes. The cost of service procedures of Functionalization, Classification, and Allocation are more fully explained in Appendix A to Staff's CCOS Report.

In its CCOS study, Staff used the detailed Base, Intermediate and Peaking ("BIP") method for allocating production investment and costs to the customer classes. These costs include operating and maintenance expenses for labor and materials, fuel, fuel handling, and interchange power costs, and also capacity costs based on each class's energy and demand

Direct Testimony of Michael S. Scheperle

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requirements. Staff used the twelve coincident peak method ("12 CP") to allocate transmission investment and costs to the customer classes. Staff used a combination of non-coincident peak demands ("NCP"), individual customer maximum demands, and company specific studies to allocate distribution investment and costs to customer classes. Customer costs are allocated to customer classes based on the number of customers, company studies, and other internal allocators. Staff's CCOS study summary attached to its CCOS Report is based on the revenue requirement associated with the mid-point of Staff's return on equity ("ROE") recommendation for Ameren Missouri's jurisdictional retail operations of \$113,139,943, and an overall increase of 4.16%.

- Q. Does this conclude your direct testimony?
- A. Yes, it does.

Michael S. Scheperle

Testimony/Reports Filed Before The Missouri Public Service Commission:

CASE NOS:

TO-98-329, In the Matter of an Investigation into Various Issues Related to the Missouri Universal Service Fund

TT-2000-527/513, Application of Allegiance Telecom of Missouri, Inc. ... for an Order Requiring Southwestern Bell Telephone Company to File a Collocation Tariff; Joint Petition of Birch Telecom of Missouri, Inc. for a Generic Proceeding to Establish a Southwestern Bell Telephone Company Collocation Tariff before the Missouri Public Service Commission

<u>TT-2001-139</u>, In the Matter of Mark Twain Rural Telephone Company's Proposed Tariff to Introduce its Wireless Termination Service

TT-2001-298, In the Matter of Southwestern Bell Telephone Company's Proposed Tariff PSC Mo. No. 42 Local Access Service Tariff, Regarding Physical and Virtual Collocation

TT-2001-440, In the Matter of the determination of Prices, Terms, and Conditions of Line-Splitting and Line-Sharing

TO-2001-455, In the Matter of the Application of AT&T Communications of the Southwest, Inc., TCG St. Louis, Inc., and TCG Kansas City, Inc., for Compulsory Arbitration of Unresolved Issues with Southwestern Bell Telephone Company Pursuant to Section 252(b) of the Telecommunications Act of 1996

TC-2002-57, In the Matter Of Northeast Missouri Rural Telephone Company's And Modern Telecommunications Company's Complaint Against Southwestern Bell Telephone Company Regarding Uncompensated Traffic Delivered by Southwestern Bell Telephone Company To Northeast Missouri Rural Telephone And Modern Telecommunications Company.

TC-2002-190, In the Matter Of Mid-Missouri Telephone Company vs. Southwestern Bell Telephone Company

<u>TC-2002-1077</u>, BPS Telephone Company, et al., vs. Voicestream Wireless Corporation, Western Wireless Corp., and Southwestern Bell Telephone Company

TO-2005-0144, In the Matter of a Request for the Modification of the Kansas City Metropolitan Calling Area Plan to Make the Greenwood Exchange Part of the Mandatory MCA Tier 2

TO-2006-0360, In the Matter of the Application of NuVox Communications of Missouri, Inc. for an Investigation into the Wire Centers that AT&T Missouri Asserts are Non-Impaired Under the TRRO

IO-2007-0439, In the Matter of Spectra Communications Group, LLC d/b/a CenturyTel's Request for Competitive Classification Pursuant to section 392.245.5 RSMo

<u>10-2007-0440</u>, In the Matter of CenturyTel of Missouri, LLC's Request for Competitive Classification Pursuant to Section 392.245.5 RSMo

TO-2009-0042, In the Matter of the Review of the Deaf Relay Service and Equipment Distribution Fund Surcharge

ER-2009-0090, In the Matter of the Application of KCP&L Greater Missouri Operations Company for Approval to Make Certain Changes in its Charges for Electric Service

ER-2009-0089, In the Matter of the Application of Kansas City Power and Light Company for Approval to Make Certain Changes in its Charges for Electric Service To Continue the Implementation of Its Regulatory Plan

ER-2010-0036, In the Matter of Union Electric Company, d/b/a AmerenUE's Tariffs to Increase its Annual Revenues for Electric Service

ER-2010-0130, In the Matter of The Empire District Electric Company of Joplin, Missouri for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Missouri Service Area of the Company

ER-2010-0355, In the Matter of the Application of Kansas City Power & Light Company for Approval to Make Certain Changes in its Charges for Electric service to Continue the Implementation of Its Regulatory Plan

ER-2010-0356, In the Matter of the Application of KCP&L Greater Missouri Operations Company for Approval to Make Certain Changes in its Charges for Electric Service

ER-2011-0028, In the Matter of Union Electric Company, d/b/a Ameren Missouri's Tariff to Increase Its Annual Revenues for Electric Service

ER-2011-0004, In the Matter of The Empire District Electric Company of Joplin, Missouri for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Missouri Service Area of the Company

EC-2011-0383, Briarcliff Development Company, a Missouri Corporation, Complainant, v. Kansas City Power and Light Company, Respondent

EO-2012-0141, In the Matter of the Application of The Cathedral Square Corporation, a Missouri Non-Profit Corporation, for a Variance from Kansas City Power & Light Company's General Rules and Regulations Requiring Individual Metering

EO-2012-0009, In the Matter of KCP&L Greater Missouri Operations Company's Application for Approval of Demand-Side Programs and for Authority to Establish a Demand-side Programs Investment Mechanism

EO-2012-0142, In the Matter of Union Electric Company d/b/a Ameren Missouri's Filing to Implement Regulatory changes in Furtherance of Energy Efficiency as Allowed by MEEIA

ER-2012-0166, In the Matter of Union Electric Company, d/b/a Ameren Missouri's Tariff to Increase Its Annual Revenues for Electric Service

ER-2012-0174, In the Matter of Kansas City Power & Light Company's Request for Authority to Implement A General Rate Increase for Electric Service

ER-2012-0175, In the Matter of the Application of KCP&L Greater Missouri Operations Company for Approval to Make Certain Changes in its Charges for Electric Service

ER-2012-0345, In the Matter of The Empire District Electric Company of Joplin, Missouri Tariffs Increasing Rates for Electric Service Provided to Customers in the Missouri Service Area of the Company

<u>HT-2013-0456</u>, In the matter of KCP&L Greater Missouri Operations Company for Authority to File Tariffs Changing the Steam QCA for Service Provided to Customers in its Service Territory

EO-2014-0075, Ameren Missouri's Request for Waivers for its Missouri Energy Efficiency Investment Act Programs

<u>HR-2014-0066</u>, In the Matter of Veolia Energy Kansas City, Inc. for Authority to File Tariffs to Increase Rates

EC-2014-0224, Noranda Aluminum, Inc., et al, Complainants, v. Union Electric Company, d/b/a Ameren Missouri, Respondent

<u>HT-2014-0286</u>, In the Matter of KCP&L Greater Missouri Operations Company to File Tariffs Changing the Steam QCA for Service Provided to Customers in its Service Territory