

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

In the Matter of The Empire)	
District Electric Company for)	File No. EO-2018-0092
Approval of Its Customer)	
Savings Plan.)	

AMEREN MISSOURI'S STATEMENT OF POSITIONS

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company) and, for its Statement of Positions on the issues included in the Joint List of Issues filed in this docket on March 21, 2018, states as follows:

Issue No. 1: Does the Commission have authority to grant Empire's requests?

Yes.

Issue No. 2: Which of Empire's requests, if any, should the Commission grant?

Ameren Missouri does not take a position on the overall merits of the Customer Savings Plan (CSP), but agrees that if the Commission believes the CSP should be approved, all the requests made by Empire respecting the CSP are reasonable and should be granted by the Commission.

Issue No. 3: What requirements should be applied to the Asbury regulatory asset?

Ameren Missouri takes no position on this issue, but states that utilities should recover both a return of and on the undepreciated portion of investments made to serve customers when it is prudent to retire the assets prior to them being fully depreciated.

Issue No. 4: Should Empire be required to make any additional filings in relation to the CSP? If so, what filings?

Ameren Missouri takes no position on this issue.

Issue No. 5: Should the Commission impose any requirements in regard to an equity

financing? If so, what requirements?

Ameren Missouri takes no position on this issue.

Issue No. 6: What conditions, if any, should be applied to the Asbury Employees?

None. Decisions as to employees whose jobs are eliminated or who must be reassigned as the result of a prudent plant closing are strictly management decisions that should be left to the management of the utility. Any other position amounts to the Commission improperly taking over the management of the utility in contravention of well-established principles of public utility law.

Issue No. 7: Should the Commission require conditions related to any impacts on local property taxes? If so, what conditions?

No. Property tax assessments, the sums due, and how those sums are allocated to various entities is a matter of non-Public Service Commission Law statutes, ordinances, and rules.

Issue No. 8: Should there be any requirements associated with the Tax Cuts and Jobs Act of 2017? If so, what requirements?

No. The Tax Cuts and Jobs Act of 2017 has an impact on utility revenue requirements. The proper place to take into account such an impact is in a proper rate proceeding, as discussed in Ameren Missouri's filings in Docket Nos. AW-2018-0174, ER-2018-0226, and ER-2018-0227. The present case is not such a rate proceeding.

Issue No. 9: Should there be any requirements associated with the potential impacts of Wind Projects on wildlife? If so, what requirements?

No. Federal and State Agencies, primarily the United States Fish and Wildlife (USF&WS) Service and the Missouri Department of Conservation (MDC) have been given jurisdiction to enforce and administer laws relating to wildlife. Moreover, those agencies possess

the expertise and experience to do so. This Commission's jurisdiction is concerned with the provision of safe and adequate utility service at just and reasonable rates. The Commission should not impose requirements respecting these matters beyond perhaps requiring a utility to comply with the lawful requirements of agencies with jurisdiction.

Issue No. 10: Should the Commission grant waivers of its affiliate transaction rules for the affiliate agreements associated with the CSP?

Ameren Missouri takes no position on this issue, but states that there are a number of circumstances where waivers of the affiliate transactions are necessary and appropriate, including where such waivers are not contrary to the purpose of the affiliate transaction rule, which is to prevent nonregulated affiliate operations from being subsidized by the regulated utility.

WHEREFORE, Ameren Missouri respectfully submits its Statement of Positions.

Respectfully Submitted,

/s/ James B. Lowery

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ATTORNEYS FOR AMEREN MISSOURI

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Statement of Positions was served on all parties of record in this case via electronic mail (e-mail) on this 4th day of April, 2018.

/s/ James B. Lowery
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