

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

In the Matter of the Establishment of a Working)
Case Regarding Membership of Missouri’s)
Investor-Owned Electric Utilities in Regional) File No. EW-2021-0104
Transmission Organizations.)

AMEREN MISSOURI’S RESPONSE TO ORDER DIRECTING RESPONSE

COMES NOW Union Electric Company d/b/a Ameren Missouri (the “Company” or “Ameren Missouri”), and for its response to the Commission’s July 25, 2022 *Order Directing Response* (“Order”), states as follows:

1. On February 16, 2021, each electrical corporation including Ameren Missouri submitted detailed answers to an extensive set of questions Staff had posed in this docket. See responses to the Commission’s December 21, 2020 *Order Directing Comments*.

2. Several months later, on June 11, 2021, Staff filed a report based on those responses which included one recommendation, which the Commission reproduced in its latest Order. Specific to Ameren Missouri, Staff noted that Ameren Missouri had commissioned and submitted prior cost-benefit studies and noted that Ameren Missouri’s response had estimated that its share of the benefits of participating in the Midcontinent Independent System Operator (“MISO”) based on the then most recent MISO benefits estimation was \$250 million annually. Staff also noted that all of the electrical corporations agreed that any benefits estimation would be just that, an estimation, and that there would be many assumptions necessary to come up with any estimation.

3. Approximately two months ago, on June 9, 2022, the Commission granted an unopposed joint motion submitted by Ameren Missouri, Staff, the Office of the Public Counsel, and the Missouri Industrial Energy Consumers whereby the joint movants agreed that Ameren Missouri’s permission to participate in MISO should be extended indefinitely. The joint movants further agreed that the indefinite extension should occur without the preparation of a costly cost-

benefit study but they also built in specific provisions that were included in the extended permission order that create an orderly process to address an event(s) or circumstance(s) in the MISO footprint that significantly effects Ameren Missouri's position in MISO. In summary, the approved terms of Ameren Missouri's participation recognize that cost-benefit studies are simply not warranted absent something significant happening that might call into question whether Ameren Missouri should continue its now nearly 20-year participation in MISO.

4. As noted, Staff's one recommendation was made more than one year ago and prior to the Commission's latest order regarding Ameren Missouri's MISO participation. The Order precipitating this response appears to have been issued based upon filings in The Empire District Electric Company's ("Empire") Southwest Power Pool ("SPP")-participation docket. Specifically, the Order references an Empire motion seeking an extension of its SPP participation permission to August 1, 2024 pending further action in this docket (or agreement of the parties to the Empire docket), and Staff's response to Empire's motion. *See Empire Motion for Continuation of Conditional Approval*, File No. EO-2012-0269 (filed July 17, 2022); *Staff Response to Liberty's Motion for Continuation of Conditional Approval* (filed July 20, 2022). Staff's July 20 Response specifically asked the Commission to require Empire to follow Staff's June 11, 2021 recommendation in this docket.

5. While Ameren Missouri is not intimately familiar with the details of regional transmission organization ("RTO") participation by the other Missouri electrical corporations, Ameren Missouri is aware of the filings made by them in this docket, which had much in common with Ameren Missouri's own response. Moreover, Ameren Missouri is aware of the difficulties and limitations of engaging in costly formal cost-benefit analyses regarding RTO participation, especially in the absence of a precipitating circumstance or event that suggests that such a study is needed or would provide meaningful, actionable results. Specific to Ameren Missouri, following

Staff's June 2021 recommendation would be inconsistent with the above-referenced joint motion in File No. EO-2011-0128 and with the Commission's order granting that joint motion. It should be noted that Ameren Missouri's detailed responses to the questions Staff posed in this docket – responses which, if given today, would not be substantially different – provide significant information demonstrating following Staff's recommendation is not warranted, as does the information contained in above-referenced joint motion filed in File No. EO-2011-0218. In summary, there is no good reason for Ameren Missouri to follow that recommendation unless something significant happens, as contemplated by Ameren Missouri's current MISO participation order, which might call that into question its continued MISO participation, or that might suggest a detailed study is needed and would provide useful information for the Commission.

WHEREFORE, as required by the Order, Ameren Missouri hereby submits its response.

Respectfully submitted,

**UNION ELECTRIC COMPANY
D/B/A AMEREN MISSOURI**

/s/ James B. Lowery

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served on all parties of record via electronic mail (e-mail) on this 25th day of August, 2022.

/s/James B. Lowery

James B. Lowery