

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariffs)
to Increase Its Annual Revenues for) Case No. ER-2021-0240
Electric Service)

**STATEMENT OF POSITION OF
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

COMES NOW the Missouri Industrial Energy Consumers ("MIEC") and, pursuant to the Commission's order dated December 6, 2021, submits its Statement of Position. This Statement of Position reflects the Commission Staff's *Updated Joint List of Issues*, which sets forth the issues remaining for hearing in this case. The MIEC reserves the right to assert additional positions on these and other issues that may arise in this proceeding.

17. Residential TOU Rates (Electric)

A. Should the Company be required to change for the names for its TOU rate plans?

MIEC Position: The MIEC does not assert a position on this issue.

22. Class Cost of Service, Revenue Allocation and Rate Design (Electric)

A. How should production costs be allocated among customer classes within a Class Cost of Service Study?

MIEC Position: Fixed production costs should be allocated among customer classes using the A&E4 NCP method proposed by Ameren Missouri.

B. How should the non-fuel, non-labor components of production, operation and maintenance expense be classified and allocated among customer classes within a Class Cost of Service Study?

MIEC Position: These costs should be classified as fixed costs and allocated among classes using the A&E-4NCP allocation method.¹

C. How should any rate increase be allocated to the several customer classes?

MIEC Position: Any rate increase should be allocated to customer classes primarily based on cost of service.

Schedule MEC-COS-5 to Mr. Brubaker's direct testimony shows the revenue neutral percentage changes needed to move each class to cost of service at present rates. After those adjustments, the overall increase granted to Ameren Missouri should be applied to the 8.81 percent overall increase to arrive at the final allocation.²

Alternatively, if the Commission decided to move half of the way (50 percent) toward cost of service, then the revenue neutral changes shown on Schedule MEC-COS-6 to Mr. Brubaker's direct testimony should be applied to the 8.81 percent overall increase to arrive at the final allocation.³

F. Should the Commission approve MIEC's recommendation to require the company to present analysis of alternatives to the hours-use rate design by 2025?

MIEC Position: The MIEC has no objection to this provision.

G. Should the Commission approve MIEC's recommendation to require the Company to present analysis of alternatives to the hours use rate design by 2025?

MIEC Position: The MIEC has no objection to this provision.

¹ Exhibit 500, *Direct Testimony of Maurice Brubaker*, pp. 33-35

² Exhibit 500, Schedule MEC-COS-5

³ Exhibit 500, Schedule MEB-COS-6

H. How should distribution costs be allocated or assigned among customer classes within a Class Cost of Service Study?

MIEC Position: Distribution costs should be allocated or assigned among customer classes within the class cost of service study as proposed by Ameren Missouri in this case.

I. What is the appropriate level of Rider B credits to be applied the bills of customers providing their own substation equipment?

MIEC Position: The appropriate level of Ride B credits should be determined in accordance with Ameren Missouri's testimony and exhibits.

Respectfully submitted,

Curtis, Heinz, Garrett & O'Keefe, P.C.

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**CERTIFICATE OF
SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed to all parties on the Commission's service list in these cases.

/s/ Diana M. Plescia