BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company)	
d/b/a Ameren Missouri's Tariffs to Adjust)	File No. ER-2022-0337
its Revenues for Electric Service)	

JOINT STAFF AND COMPANY MOTION TO ADOPT LOCAL PUBLIC HEARING RECOMMENDATION

COME NOW the Staff of the Missouri Public Service Commission ("Staff") and Union Electric Company d/b/a Ameren Missouri ("Company" or "Ameren Missouri") (collectively, the "Joint Movants"), and for their joint motion respecting local public hearings to be held in this case, state as follows:

- 1. The Commission's *Order Setting Procedural Schedule and Adopting Test Year* (the "Procedural Order") contemplates that local public hearings will be held in this case between January 30 and February 3, 2023.
- 2. The Joint Movants have discussed and considered the question of how many local public hearings are appropriate in this case, as well the question of how those local public hearings should be held. In arriving at their recommendation herein, Joint Movants are mindful of the scope of the Company's service territory, the historical participation in prior local public hearings at various locations, and the ability that now exists and that has been utilized extensively by the Commission to afford the opportunity for customers anywhere in the state to participate in such hearings virtually without the need to travel at all.
- 3. Based on those considerations, Joint Movants recommend that live local public hearings be held as follows:

Sunset Hills City Hall	City of Cape Girardeau	
Council Chambers	Osage Centre	
3939 Lindbergh Blvd.	1625 North Kingshighway	
St. Louis, MO 63127	Cape Girardeau, Missouri 63701	

Harris Stowe State University	Missouri Public Service Commission	
3026 Laclede	Governor Office Building	
St. Louis, Missouri 63103	200 Madison Street, Room 310	
	Jefferson City, Missouri 65102	
O'Fallon City Hall	Kirksville TCRC	
100 North Main Street	315 South Franklin Street	
O'Fallon, MO 63366 or	Kirksville, Missouri 63501, or	
St. Charles County Admin. Bldg., Rm. 116	Truman State University	
201 North 2nd Street	Student Union Activities Room	
St. Charles, Missouri 63301	901 S. Franklin	
	Kirksville, Missouri 63501	

- 4. In addition, Joint Movants recommend that two virtual local public hearings be held, one at Noon and one at 6:00 p.m. Joint Movants recommend that the virtual local public hearings not coincide with any live local public hearings, and that the start times of the live local public hearings be alternated between Noon and 6:00 in a manner that most efficiently allows all eight local public hearings to be completed between January 30 and February 3, 2023.
- 5. Joint Movants recommendation differs from that of the Office of the Public Counsel and two other parties in two primary ways. First, Joint Movants recommend six instead of eight live local public hearings. Second, Joint Movants recommend two instead of three virtual local public hearings.
- 6. Joint Movants recommendation is more reasonable and appropriate for several reasons. First, between three live local public hearings plus two more virtual local public hearings, residents in the St. Louis Metropolitan Area will have many opportunities to attend a local public hearing without holding a fourth in that area. Second, history indicates that local public hearings in the Company's western Missouri service area have been poorly attended, with just two individuals at the question and answer the last time a local public hearing was held in that area and

no testifying witnesses at all (File No. ER-2016-0179). The Commission did not hold a local public hearing in that area in the Company's last general rate proceeding. Third, there would be severe logistical challenges for the Commission and the parties to hold eight live (plus three virtual) local public hearings over the five-day span of time allotted by the Procedural Order. For the reasons already given, it is not necessary to do so. Finally, even the recommended six local public hearings and two virtual local public hearings are arguably excessive. Consider that in the pending Spire Missouri general rate case (File No. GR-2022-0179) – involving Spire's operations in both eastern and western Missouri – the Commission only ordered two live local public hearings, with no virtual local public hearings. In the pending Evergy general rate cases (File Nos. ER-2022-0129 and ER-2022-0130), there were just three local public hearings across both cases, all held virtually.

WHEREFORE, Joint Movants respectfully request that the Commission adopt their joint local public hearing recommendation, as reflected herein.

Respectfully submitted,

/s/ James B. Lowery
James B. Lowery, MO Bar #40503
JBL Law, LLC
3406 Whitney Ct.
Columbia, MO 65203-6734
(573) 476-0050 (phone)
Email: lowery@jbllawllc.com
Attorney for Ameren Missouri

/s/ Jeffrey A. Keevil
Jeffrey A. Keevil
Missouri Bar No. 33825
P. O. Box 360
Jefferson City, MO 65102
(573) 526-4887 (Telephone)
(573) 751-9285 (Fax)
Email: jeff.keevil@psc.mo.gov
Attorney for the Staff of the Missouri
Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System on this 12th day of October 2022.

/s/ James B. Lowery