

## Missouri Public Service Commission

### Data Request

**Data Request No.** 0104.6  
**Company Name** Union Electric Company-Investor(Electric)  
**Case/Tracking No.** ER-2021-0240  
**Date Requested** 6/21/2021  
**Issue** General Information & Miscellaneous - Other General Info & Misc.  
**Requested From** Geri Best  
**Requested By** Jeff Keevil  
**Brief Description** Follow up to DR 104.2 re conductors

**Description** Refer to the response to DR 104.2. For each circuit identified on tabs "Distribution" and "Subtransmission" please indicate the number of conductors, separately by overhead and underground portions, if applicable. If known, please identify the conductor by retirement unit name. If retirement unit name is not retained within this record system, please provide any identifying information contained within the relevant record system. For each circuit please indicate whether an additional conductor or other cable or wire is installed for lightning protection. For each circuit please indicate whether fiber optic or other communication cabling or wiring is installed and provide the retirement unit name or other identifying information for such cabling or wiring, as well as the miles and numbers of conductor installed. Please clarify whether the columns identified as "OH Miles", "UG Miles," and "Total Miles," refer to miles that the circuit extends, or to miles of conductors where more than one conductor is present. DR requested by Sarah Lange (sarah.lange@psc.mo.gov).

**Due Date** 7/11/2021

**Security** Public  
**Rationale** NA

Ameren Missouri's  
Response to MPSC Data Request - MPSC  
ER-2021-0240

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues  
for Electric Service

No.: MPSC 0533

Consider the following hypothetical customers. For each, please provide an itemized construction estimate including a detailed list of the specific materials that would be expected to be used for that circumstance, the current cost of those materials, and the expected installation cost of those materials. Please identify those materials with labeling or reference numbers consistent with the descriptions used in the continuing property catalog.

1. A 3000 sq ft house with no gas or propane, located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

2. A 1000 sq ft house with propane located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

3. A 3000 sq ft house with no gas or propane, located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

4. A 1000 sq ft house with propane located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

5. A 5000 sq ft commercial office with no gas or propane, located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

6. A 1000 sq ft commercial office with propane located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

7. A 5000 sq ft commercial office with no gas or propane, located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

8. A 1000 sq ft commercial office with propane located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

9. A 1 MW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

10. A 1 MW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

11. A 5 MW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

12. A 5 MW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

13. A 10 MW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

14. A 10 MW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along

an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

15. A 20MW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

16. A 20MW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

17. A 25 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

18. A 25 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

19. A 50 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

20. A 50 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

21. A 75 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

22. A 75 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No

additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

23. A 100 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

24. A 100 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

25. A 200 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

26. A 200 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

27. A 500 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

28. A 500 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

29. A 750 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area.

30. A 750 kW customer located 1 mile from a suitable point of interconnection with existing distribution infrastructure with sufficient capacity to serve the load. The line will be placed along an existing road with no other infrastructure present, and no surface or sub-surface issues. No additional load is expected to materialize in the area. Underground distribution and service facilities are requested.

Sarah Lange  
(sarah.lange@psc.mo.gov)

**RESPONSE**

**Prepared By: Tom Hickman**  
**Title: Regulatory Rate Specialist**  
**Date: 8/17/2021**

**CONFIDENTIAL**  
**20 CSR 4240-2.135(2)(A)1**  
**ATTACHMENT ONLY**

Subject to the Company's objection, a sample of new business projects to provide as representative as was reasonable of the cost of connecting customers of different sizes was developed. Please see the attached excel workbooks which include AP and PD (Accounts Payable and Payroll Distribution) cost information by work order, representing the cost of installation, and EMPRV data by work order, representing the cost of materials, for this sample.

Ameren Missouri's  
Response to Staff Data Request - MSPC  
ER-2021-0240

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues  
for Electric Service

No.: MPSC 0592

Data Request Information Refer to the “Corrected Non-Unanimous Stipulation and Agreement” in ER-2019-0335, providing “Upon request by Staff, the Company shall make available determinants associated with the potential creation of a coincident peak demand charge for all classes, which may be based on either fifteen (15) minute or one (1) hour readings. Data shall be made available in the form of hourly usage per customer and aggregate hourly usage by rate schedule with and without applicable metering or voltage adjustments.” For each month for which data is available, and for each rate schedule, please provide hourly usage per customer and aggregate hourly usage by rate schedule with and without applicable metering or voltage adjustments. Please indicate whether data provided is based on load research data or gross AMI meter data, and whether such load data is derived from load research sample customer, aggregated AMI readings, or some other source. Sarah Lange (sarah.lange@psc.mo.gov)

**RESPONSE**

**Prepared By: Prasenjit Shil**  
**Title: Load Forecasting Manager**  
**Date: 07/20/2021**

Please refer to the attached spreadsheet "Per\_Customer\_Usage\_Response\_Data.xlsx" for the data requested. Please see below for the descriptions on each tab in the spreadsheet.

- *The tab named "USAGE":* This tab contains hourly aggregated rate class level estimated usage between 01/01/2020 and 04/30/2021 based on calendar month. Estimated usage for various classes are derived from the Load Research samples except for large primary service or LPS (11M) class which uses census analysis. Hourly usage for the LPS customers are directly sourced from Ameren Missouri's billing system.
  - While usage for residential (1M), small general service or SGS (2M), and large general service or LGS (3M) are estimated at the secondary voltage level, usage for small primary service or SPS (4M) class is provided at the primary voltage level. Load research estimates for SPS class are aggregated at the primarily voltage level. Usage in large primary service (11M) are provided at various delivery voltage levels namely primary, sub-transmission and transmission.
- *The tab named "CUSTOMER\_COUNT":* This tab contains monthly customer counts by primary month.
- *The tab named "PER\_CUST\_USAGE":* This tab contains estimated usage per-customer.





**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 Decrease            )       File No. ER-2019-0335  
Its Revenues for Electric Service.                        )

**CORRECTED NON-UNANIMOUS STIPULATION AND AGREEMENT**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “the Company”), the Staff of the Missouri Public Service Commission (“Staff”), the Office of the Public Counsel (“OPC”), Missouri Department of Natural Resources - Division of Energy (“DE”), Missouri Industrial Energy Consumers (“MIEC”), Midwest Energy Consumers Group (“MECG”), Consumers Council of Missouri (“CCM”), Natural Resources Defense Council, and the Sierra Club (collectively “Signatories”), and present to the Missouri Public Service Commission (“Commission”) for approval this Stipulation and Agreement (“*Stipulation*”) commemorating an agreement between the Signatories resolving, except as reserved herein, the issues in this case related to Ameren Missouri's revenue requirement and rate design. Renew Missouri Advocates has authorized the Signatories to indicate that it does not object to this Stipulation. In support of this *Stipulation*, the Signatories respectfully state as follows:

**BACKGROUND**

1. On July 3, 2019, Ameren Missouri filed tariff sheets designed to implement a general rate decrease for its electric service territory, together with supporting testimony. The Commission issued a procedural schedule in its August 15, 2019, *Order Setting Test Year and Adopting Procedural Schedule*. This procedural schedule included a date for the provision of preliminary true-up revenue requirement, including true-up accounting schedules with supporting

workpapers, to all parties by January 31, 2020, and culminated in an evidentiary hearing set to begin March 2, 2020, and continue through March 13, 2020.

2. After the dissemination of the true-up information and subsequent preliminary reconciliation of those numbers, the Signatories began negotiations in earnest to determine whether a resolution of issues could be mutually reached in advance of the submission of Surrebuttal Testimony. As a result of these discussions, the Signatories have agreed to a series of compromises to determine mutually acceptable resolutions to several issues relating to revenue requirement and rate design which are set forth in more detail below. The Signatories agree that resolution of these revenue requirement and rate design issues will shorten the forthcoming hearing, and only certain issues will require a hearing. Specifically, OPC's positions on the appropriate sharing percentage for Ameren Missouri's Fuel Adjustment Clause ("FAC") and on affiliate transactions. Each of the Signatories agreed to the settled "black box" revenue requirement decrease amount using their own assumptions.

## **SPECIFIC TERMS AND CONDITIONS**

### **A. Revenue Requirement, Billing Determinants, and Net Base Energy Costs**

3. Revenue Requirement Decrease. The Signatories agree that Ameren Missouri should be authorized to file tariffs designed to decrease the Company's revenues by \$32 million, exclusive of any applicable license, occupation, franchise, gross receipts taxes, or similar fees or taxes, to become effective April 1, 2020, or as soon as possible thereafter. If a customer's billing cycle covers days both before and after the effective date of the new rates, the new and old rates will be pro-rated on the customer's bill. After implementation of new base rates in this case, Ameren Missouri shall not file additional tariffs seeking to change its base electric rates before July 6, 2020.

**N. Miscellaneous**

39. Federal Energy Regulatory Commission ("FERC") ROE. The Signatories agree that Ameren Missouri shall continue its regulatory liability for the first FERC ROE case refunds, except that amortization of the first FERC ROE case refunds regulatory liability will not begin until the conclusion of the Company's next electric rate case assuming all litigation that may impact the final first FERC ROE case refunds is completed. If said litigation is not completed, amortization will start after the conclusion of the first Company electric rate case concluding after those refunds are finalized. The Company will continue the treatment for refunds attributable to the second FERC ROE case that was agreed upon in File No. ER-2016-0179.

40. Cost Measurement Savings. The Company will provide the cost measurement savings reporting to Staff and OPC and other Signatories that request it as outlined at p. 42, ll. 10-22 of Laura Moore's rebuttal testimony, except the threshold will be \$500,000 and reporting will commence by July 1, 2020.

41. AMI Data Tracking.

- a. Ameren Missouri shall retain a minimum of rolling 12 months interval data for customers with AMI meters so that customers may compare TOU options. Data shall be maintained in such a manner that it is accessible for load research purposes, which will require at least 16 months of data. Upon request by Staff, the Company shall make available determinants associated with the potential creation of a coincident peak demand charge for all classes, which may be based on either fifteen (15) minute or one (1) hour readings. Data shall be made available in the form of hourly usage per customer and aggregate hourly usage by rate schedule with and without applicable metering or voltage adjustments.

- b. Ameren Missouri shall meet with Staff, OPC, and other interested Stakeholders in April 2020 to discuss data collection and retention policies around voltage level data, including but not limited to the following:
  - 1. Cost of 600 V network elements;
  - 2. Cost of network between 600 V and 34 kV;
  - 3. Cost of 34 kV network;
  - 4. Cost of 69 kV network;
  - 5. Cost of 115 kV network;
  - 6. New customer-prepaid investments by voltage and rate schedule of customer;
  - 7. New meter investment by rate schedule;
  - 8. Service drop investment by rate schedule and by voltage;
  - 9. Transformer investment by rate schedule; and
  - 10. Customer load data by geographic area as may be useful in creation of cost-based DSM programs.
  
- c. Ameren Missouri shall follow up with Staff, OPC, and other interested Stakeholders by the end of June 2020 regarding any outstanding questions on data collection and retention policies.

42. NARUC Resolution. Interested Signatories agree to meet at a mutually agreeable time to discuss the National Association of Regulatory Utility Commissioners ("NARUC") resolution on cloud computing and the merits of rate-making solutions for the concerns raised therein.

43. Energy Statements. The Company agrees to alter customer bill presentations (also known as "energy statements") as soon as possible, but no later than September 1, 2020, so that the energy charge is broken out by rate block and season, as applicable. In addition, the Company agrees to alter non-residential customers' energy statements to show the applicable demand charges as soon as possible, but not later than September 1, 2020.

## GENERAL PROVISIONS

52. This *Stipulation* is being entered into solely for the purpose of settling the issues specifically set forth above, and unless otherwise specifically set forth herein represents a settlement on a mutually-agreeable outcome without resolution of specific issues of law or fact. This *Stipulation* is intended to relate *only* to the specific matters referred to herein; no Signatory waives any claim or right which it may otherwise have with respect to any matter not expressly provided for herein. No Signatory will be deemed to have approved, accepted, agreed, consented, or acquiesced to any substantive or procedural principle, treatment, calculation, or other determinative issue underlying the provisions of this *Stipulation* except as otherwise specifically set forth herein. Except as specifically provided herein, no Signatory shall be prejudiced or bound in any manner by the terms of this *Stipulation* in any other proceeding, regardless of whether this *Stipulation* is approved.

53. This *Stipulation* has resulted from extensive negotiations among the Signatories and the terms hereof are interdependent. In the event the Commission does not approve this *Stipulation*, or approves it with modifications or conditions to which a Signatory objects, then this *Stipulation* shall be null and void, and no Signatory shall be bound by any of its provisions.

54. If the Commission does not approve this *Stipulation* unconditionally and without modification, and notwithstanding its provision that it shall become void, neither this *Stipulation*, nor any matters associated with its consideration by the Commission, shall be considered or argued to be a waiver of the rights that any Signatory has for a decision in accordance with Section 536.090, RSMo 2000 or Article V, Section 18 of the Missouri Constitution, and the Signatories shall retain all procedural and due process rights as fully as though this *Stipulation* had not been presented for approval, and any suggestions or memoranda, testimony or exhibits that have been

offered or received in support of this *Stipulation* shall become privileged as reflecting the substantive content of settlement discussions and shall be stricken from and not be considered as part of the administrative or evidentiary record before the Commission for any further purpose whatsoever.

55. If the Commission unconditionally accepts the specific terms of this *Stipulation* without modification, the Signatories waive, with respect only to the issues resolved herein: their respective rights (1) to call, examine and cross-examine witnesses pursuant to Section 536.070(2), RSMo 2000; (2) their respective rights to present oral argument and/or written briefs pursuant to Section 536.080.1, RSMo 2000; (3) their respective rights to the reading of the transcript by the Commission pursuant to Section 386.080.2, RSMo 2000; (4) their respective rights to seek rehearing pursuant to Section 386.500, RSMo 2000; and (5) their respective rights to judicial review pursuant to Section 386.510, RSMo Supp. 2011. These waivers apply only to a Commission order respecting this *Stipulation* issued in this above-captioned proceeding, and do not apply to any matters raised in any prior or subsequent Commission proceeding, or any matters not explicitly addressed by this *Stipulation*.

56. The Signatories shall also have the right to provide, at any agenda meeting at which this *Stipulation* is noticed to be considered by the Commission, whatever oral explanation the Commission requests, provided that each Signatory shall, to the extent reasonably practicable, provide the other parties with advance notice of the agenda meeting for which the response is requested. Signatory's oral explanations shall be subject to public disclosure, except to the extent they refer to matters that are privileged or protected from disclosure pursuant to the Commission's rules on confidential information.

57. This *Stipulation* contains the entire agreement of the Signatories concerning the issues addressed herein.

58. This *Stipulation* does not constitute a contract with the Commission and is not intended to impinge upon any Commission claim, right, or argument by virtue of the *Stipulation's* approval. Acceptance of this *Stipulation* by the Commission shall not be deemed as constituting an agreement on the part of the Commission to forego the use of any discovery, investigative or other power which the Commission presently has or as an acquiescence of any underlying issue. Thus, nothing in this *Stipulation* is intended to impinge or restrict in any manner the exercise by the Commission of any statutory right, including the right to access information, or any statutory obligation.

59. The Signatories agree that this *Stipulation*, except as specifically noted herein, resolves all issues related to these topics, and that the agreement and its exhibits should be received into the record without the necessity of any witness taking the stand for examination. Further, contingent upon Commission approval of this *Stipulation* without modification, the Signatories hereby stipulate to the admission into the evidentiary record of the pre-filed written testimony of their witnesses except for those witnesses testifying on the remaining issues set for evidentiary hearing.

**WHEREFORE**, the Signatories respectfully request that the Commission approve this *Stipulation*, so that Ameren Missouri may move forward on these provisions, and grant any other and further relief as it deems just and equitable.

Respectfully submitted,

/s/ Wendy Tatro

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**ATTORNEY'S FOR UNION ELECTRIC  
d/b/a AMEREN MISSOURI**

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CONSUMERS**



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**/s/ Henry B. Robertson**

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**Attorney for NRDC and Sierra Club**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 28th day of February, 2020, to counsel for all parties on the Commission's service list in this case.

**/s/ Wendy Tatro**

Ameren Missouri's  
Response to MPSC Data Request - MPSC  
ER-2021-0240

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues  
for Electric Service

No.: MPSC 0615

For each of the following customer types, please describe the operational characteristics of the typical overhead and underground service drop, including but not limited to maximum instantaneous and maximum continuous amperage, kW, voltage, etc, at both single phase and three phase: 1 Residential Underground Single phase , 2 Residential Underground Three phase , 3 Residential Overhead Single phase , 4 Residential Overhead Three phase , 5 SGS Underground Single phase , 6 SGS Underground Three phase , 7 SGS Overhead Single phase , 8 SGS Overhead Three phase , 9 LGS Underground Single phase , 10 LGS Underground Three phase , 11 LGS Overhead Single phase , 12 LGS Overhead Three phase , 13 SPS/LPS Underground Single phase , 14 SPS/LPS Underground Three phase , 15 SPS/LPS Overhead Single phase , 16 SPS/LPS Overhead Three phase . Sarah Lange (sarah.lange@psc.mo.gov)

**RESPONSE**

**Prepared By: Tom Hickman**  
**Title: Regulatory Rate Specialist**  
**Date: 07/16/2021**

Subject to the Company's objections, there is not a typical overhead or underground service drop for the categories of customers described. To be able to identify the characteristics of a service drop for a customer, an engineer would look to obtain a completed load sheet indicating their needs for electrical service and a site plan indicating where the service entrance will be. There may also be discussion between a customer seeking service and an engineer to the extent additional information is needed, and both may consult the Ameren Service Manual, as well. Please see attached "Load Sheet.xlsx" for a sample blank load sheet.

**JAMES B. LOWERY**  
ATTORNEY AT LAW

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July 9, 2021

Mr. Jeff Keevil  
Deputy Staff Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Re: File No. ER-2021-0240

Dear Jeff:

The Company objects to DR Nos. 678-680 and 681 on the grounds that they seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, are overly broad, unduly burdensome, and oppressive, and seek to require the Company to engage in research, compile data, and perform analyses rather than seeking the discovery of existing facts, documents, or materials and are therefore beyond the scope of proper discovery.

The Company objects to part 5 of DR No. 682's use of the phrase "all documentation" because said phrase is vague and indefinite. Subject to this objection, a response will be provided.

As indicated in my prior communication regarding necessary IT upgrades to the Company's DR processing system, the Company also gives notice that it may require up to an additional seven days to respond to the above-referenced DRs and to DR Nos. 676, 677, and 555.1.

Sincerely,

*/s/ James B. Lowery*

James B. Lowery

Cc: Geri Best, Carolyn Mora, Teneisha Perry, Wendy Tatro, Jermaine Grubbs

Ameren Missouri's  
Response to MPSC Data Request - MPSC  
ER-2021-0240

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues  
for Electric Service

No.: MPSC 0681

Please refer to the attached excel workbook “rate schedules and voltages” and provide the average number of customers, by month, taking service on all possible permutations of rate schedules and voltages billed and served, including but not limited to the rate schedule and voltage combinations indicated. In the case of customers receiving service on Riders B or C, please identify the number of customers billed and served at all applicable combinations of voltages. Sarah Lange (sarah.lange@psc.mo.gov)

**RESPONSE**

**Prepared By: Tom Hickman**  
**Title: Regulatory Rate Specialist**  
**Date: 07/19/2021**

Subject to the Company's objections, information relating to the rate schedule of individual customers is maintained in our billing system. Our billing system does not contain record of specific service voltage. A generic service voltage (Primary, Secondary, or High Voltage) can be derived from the rate schedules themselves. For example, 1M/2M/3M are customers served at secondary voltage, etc.

For information on customer count by month by rate schedule, please refer to file "MPSC 0494 Billing Unit Workpaper Update.xlsx" provided in response to DR MPSC 0494 for information covering May 2020 – April 2021, please refer to witness Nick Bowden's direct filing workpaper "Ameren – UE\_DIR\_001\_Bowden-Att-Billing Unit Workpaper" for information covering January 2020 – April 2020.

Residential										Small General Service				Large General Service				Small Primary Service					Large Primary Service					Company Owned Lighting	Customer Owned Lighting	Large Transmission Service										
R-BASIC	R-DAYNIGHT	R-TOU	R-TOUZ	R-TOUUS	R-BASIC	R-DAYNIGHT	R-TOU	R-TOUZ	R-TOUUS	2(M)				3(M)				4(M)				4(M) with Rider B 1.1	4(M) with Rider B 1.2	4(M) with Rider B 2	4(M) with Rider C	11(M)					11(M) with Rider B 1.1	11(M) with Rider B 1.2	11(M) with Rider B 2	11(M) with Rider C	5(M)	6(M)	12(M)			
Service Voltage	120V	120V	120V	120V	120V	208V	208V	208V	208V	208V	120V	208V	277V	480V	Rider C (specify voltage metered and voltage billed)	120V	208V	240V	277V	480V	Rider C (specify voltage metered and voltage billed)	2.4kV	7.2kV	12.1kV	12.5kV	34.5kV	69kV	115kV	Rider C (specify voltage metered and voltage billed)	2.4kV	7.2kV	12.1kV	12.5kV	34.5kV	69kV	115kV	Rider C (specify voltage metered and voltage billed)	Specify Voltage	Specify Voltage	Specify Voltage

Monthly Average Number of customers receiving single phase service:

- Jan-20
- Feb-20
- Mar-20
- Apr-20
- May-20
- Jun-20
- Jul-20
- Aug-20
- Sep-20
- Oct-20
- Nov-20
- Dec-20
- Jan-21
- Feb-21
- Mar-21
- Apr-21
- May-21
- Jun-21

Monthly Average Number of customers receiving three phase service:

- Jan-20
- Feb-20
- Mar-20
- Apr-20
- May-20
- Jun-20
- Jul-20
- Aug-20
- Sep-20
- Oct-20
- Nov-20
- Dec-20
- Jan-21
- Feb-21
- Mar-21
- Apr-21
- May-21
- Jun-21

Rider C customer voltage information:

## Missouri Public Service Commission

### Data Request

<b>Data Request No.</b>	0681.1
<b>Company Name</b>	Union Electric Company-Investor(Electric)
<b>Case/Tracking No.</b>	ER-2021-0240
<b>Date Requested</b>	8/3/2021
<b>Issue</b>	General Information & Miscellaneous - Other General Info & Misc.
<b>Requested From</b>	Geri Best
<b>Requested By</b>	Jeff Keevil
<b>Brief Description</b>	Lowery email of 7/30/2021 re inability or refusal to identify number of customers served
<b>Description</b>	Provide the average number of customers, by month, for the months January, 2020 – June, 2021, taking service on each numerical value of voltages separately for single phase and three phase under which Ameren Missouri bills or provides service. In the case of customers receiving service on Riders B or C, please identify the number of customers billed and served at all applicable combinations of voltages. If average number of customers by month is not known, provide starting month, ending month, middle month, or other comparable value. If omitting a level of detail is necessary to provide an answer to this DR, omit such level of detail and fully explain why Ameren Missouri is incapable of providing that detail. Data Request submitted by Sarah Lange (sarah.lange@psc.mo.gov).
<b>Due Date</b>	8/23/2021
<b>Security Rationale</b>	Public NA