



March 31, 2021

Mr. Morris Woodruff
Secretary of the Commission
Missouri Public Service Commission
200 Madison Street, Suite 100 Jefferson
City, MO 65102

RE: Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri")
File No.: GR-2021-0241

Dear Mr. Woodruff:

Filed concurrently with this letter is a cover letter from Ameren Missouri's Corporate Counsel, Jermaine Grubbs, with which is included certain tariff sheets consisting of gas rate schedules designed to increase Ameren Missouri's gas base rate annual revenues by approximately \$9,403,160. The above-cited figure is exclusive of applicable gross receipts, sales, franchise or occupational fees or taxes. The proposed tariff sheets bear a date of issue of March 31, 2021, and an effective date of April 30, 2021.

The test year employed by the Company is the 12 months ending December 31, 2020, with certain pro-forma adjustments to include known and measurable items through September 30, 2021, the true-up cutoff date the Company is requesting in this case, as discussed in the direct testimony of Ameren Missouri witness Mitchell Lansford.

The rate increase sought by this filing is driven by multiple factors. These include incorporating into rate base investments needed to maintain and improve the safety of the distribution system since the last gas general rate case (File No. GR-2019-0077). Another driver for the filing of this general rate case is the Company's agreement in its last gas general rate case to file its next gas general rate case concurrently with the filing of its next electric general rate case.

Also included herein or in Schedules to this letter is the information required by 20 CSR 4240-3.030(3)(B), as follows:

- 3(B)1.** See Schedule 1.
 - 3(B)2.** See Schedule 2.
 - 3(B)3.** See Schedule 3.
 - 3(B)4.** See Schedule 4.
 - 3(B)5.** See Schedule 5.
 - 3(B)6.** See attached press release.
-

3(B)7. The changes are needed for the following reasons:

- Update our general rates to reflect rate base additions since the last natural gas general rate case (Case No. GR-2019-0077); and
- Follow through on Ameren Missouri's commitment to file its next gas general rate case concurrently with its next-to-be-filed electric general rate case.

As required by 20 CSR 4240-2.065(1), this filing includes Ameren Missouri's direct testimony relating to this general rate increase request. Direct Testimony is provided by the following witnesses:

Warren Wood	Overview of Company and Rate Increase Request; Policy; Introduction of Company Witnesses
Jeffrey R. Berg	Natural Gas Energy Efficiency
Ann E. Bulkley	Rate of Return
Tom Byrne	Rate Case Expense
Timothy L. Eggers	Missouri School Board Association Pilot Program
Michael W. Harding	Rate Design; Misc. Tariff Updates; Weather Normalization Process
Kelsey Ann Klein	Class Cost of Service Study
Mitchell Lansford	Revenue Requirement; Lead/Lag Study
Laura M. Moore	Affiliate Transactions
John J. Reed	Affiliate Transactions
Darryl T. Sagel	Capital Structure

I request that you please bring this filing to the attention of the appropriate Commission personnel and see that a copy of all correspondence, notices, orders or other communications in connection with this matter and proceeding are furnished to the following persons:

Wendy Tatro
Director and Assistant General Counsel
Paula N. Johnson
Senior Corporate Counsel
Jermaine Grubbs
Corporate Counsel
Ameren Missouri
P.O. Box 66149, MC 1310
St. Louis, MO 63166-6149
Telephone: (314) 554-2041
Facsimile: (314) 554-4014
AmerenMOService@ameren.com

James Lowery
Principal
LBL Law, LLC
3406 Whitney Ct.
Columbia, MO 65203-6734
Telephone: (573) 476-0050
lowery@jblawllc.com

Denise Fields
Fields & Brown
300 E. 39th Street
Suite LL1F
Kansas City, MO 64111
Telephone: (816) 474-1700
Facsimile: (816) 421-6239
dfields@fieldsandbrown.com

Eric Kendall Banks
Banks Law LLC
1824 Chouteau Avenue
St. Louis, Missouri 63103
Telephone: (314) 583-7075
E-Fax: (302) 365-2789
ericbanks@banksllaw.com

Thank you for your assistance with this filing. Should you have any questions, please contact me.

Sincerely,

ls\ **Jermaine Grubbs**

Jermaine Grubbs
Corporate Counsel

cc: Missouri Public Service Commission Staff Counsel
Office of the Public Counsel

UNION ELECTRIC COMPANY
d/b/a AMEREN MISSOURI
Missouri Natural Gas Operations

AGGREGATE ANNUAL INCREASE

The aggregate annual increase over current revenues produced by current base rates proposed in the tariffs is \$9,403,160 for Ameren Missouri, which is an overall increase of a customer's total bill (including Purchased Gas Adjustment charges) of 6.4% on a pro forma basis.

UNION ELECTRIC COMPANY
d/b/a AMEREN MISSOURI
Missouri Natural Gas Operations

COMMUNITIES AFFECTED BY FILING

Advance	Hallsville	Painton
Ashland	Hartsburg	Perkins
Ash Hill	Hawk Point	Pierpont
Auxvasse	Higbee	Prairie Home
Blackwater	High Hill	Prathersville
Bloomfield	High Point	Randles
Boonville	Hinton	Renick
Browns Station	Holts Summit	Rivers Addition
Cairo	Huntsville	Rocheport
California	Idalia	Rolla
Cape Girardeau	Jamestown	Russellville
Center	Jefferson City	St. Martins
Centertown	Jonesburg	Salem
Centralia	Kelso	Scott City
Circle City	Ladsonia	Silex
Clark	Lohman	Stover
Clarksville	Louisiana	Sturgeon
Columbia	Marble Hill	Troy
Curryville	Maryknoll	Truesdale
Delta	Martinsburg	Truxton
Dexter	McGirk	Vandalia
Eldon	Mexico	Vandiver
Elsberry	Midway	Vanduser
Elston	Moberly	Versailles
Essex	Moscow Mills	Wardsville
Farber	Nelson	Warrenton
Fisk	New Bloomfield	Wellsville
Flint Hill	New Franklin	Wentzville
Foley	New London	Winfield
Foristell	Old Monroe	Wright City
Franklin	Olean	
Glen Allen	Owensville	
Grayridge		

UNION ELECTRIC COMPANY
d/b/a AMEREN MISSOURI
Missouri Natural Gas Operations

COUNTIES AFFECTED BY FILING

Audrain County
Bollinger County
Boone County
Butler County
Callaway County
Cape Girardeau County
Cole County
Cooper County
Dent County
Gasconade County
Howard County
Lincoln County
Miller County
Moniteau County
Montgomery County
Morgan County
Phelps County
Pike County
Ralls County
Randolph County
St. Charles County
Saline County
Scott County
Stoddard County
Warren County

UNION ELECTRIC COMPANY
d/b/a AMEREN MISSOURI
Missouri Natural Gas Operations

**NUMBER OF CUSTOMERS AFFECTED BY GENERAL
CATEGORY OF SERVICE AND RATE CLASSIFICATION**

AVERAGE FOR TWELVE MONTHS ENDING DECEMBER 2020

<u>Service and Rate Classification*</u>	<u>Number of Customers</u>
Residential Service	121,074
General Service	13,082
Interruptible Service	7
Transportation Service	
Standard Transportation	653
Large Volume Transportation	20
Special Contract	<u>3</u>
TOTAL CUSTOMERS	134,839

* Ameren Missouri's general categories of service and rate classifications for natural gas service are substantially the same.

UNION ELECTRIC COMPANY

d/b/a AMEREN MISSOURI

Missouri Natural Gas Operations

**PROPOSED AVERAGE ANNUAL CHANGE REQUESTED IN DOLLARS
AND PERCENTAGE CHANGE FROM CURRENT RATES***

TWELVE MONTHS ENDING DECEMBER 2020

<u>Service and Rate Classification**</u>	<u>Average Annual Change</u>	<u>Percentage Change</u>
Residential Service	\$ 47	7.1%
General Service	\$ 148	6.0%
Interruptible Service	\$ 7,409	5.0%
Transportation Service		
Standard Transportation	\$ 1665	5.6%
Large Volume Transportation	\$ 30,849	4.6%

* Includes a weighted average PGA factor of 46.02¢/Ccf and 29.37¢/Ccf for Firm (Residential and General Service) and Interruptible Service respectively, and an assumed 29.37¢/Ccf gas for Transportation Service.

** Ameren Missouri's general categories of service and rate classifications for natural gas service are substantially the same.

UNION ELECTRIC COMPANY

d/b/a AMEREN MISSOURI

Missouri Natural Gas Operations

**PROPOSED ANNUAL AGGREGATE CHANGE AND
PERCENTAGE CHANGE IN REVENUES FROM CURRENT RATES***

<u>Service and Rate Classification**</u>	<u>Annual Aggregate Change</u>	<u>Percentage Change</u>
Residential Service	\$ 5,690,703	7.1%
General Service	\$ 1,941,499	6.0%
Interruptible Service	\$ 50,627	5.0%
Transportation Service		
Standard Transportation	\$ 1,087,728	5.6%
Large Volume Transportation	<u>\$ 624,698</u>	<u>4.6%</u>
TOTAL***	\$ 9,395,255	6.4%

* Includes a weighted average PGA factor of 46.02¢/Ccf and 29.37¢/Ccf for Firm (Residential and General Service) and Interruptible Service respectively, and an assumed 29.37¢/Ccf gas for Transportation Service.

** Ameren Missouri's general categories of service and rate classifications for natural gas service are substantially the same.

*** Includes revenues from special contract customers and excludes assumed price of gas for Transportation Service customers. The targeted change in base revenues from Ameren Missouri witness Mitchell Lansford's direct testimony are \$9,403,160; however, after rate rounding the tariffs are designed to produce increased revenues of \$9,395,255, or -\$7,905 less than stated in Mr. Lansford's testimony.

**Contact:**

Ameren Missouri Communications
314.554.2182
MissouriCommunications@Ameren.com

FOR IMMEDIATE RELEASE

Ameren Missouri requests 2022 rate adjustments as it continues major upgrades to bolster electric and natural gas systems

Customers benefit from cleaner energy and more reliable service

ST. LOUIS (March 31, 2021) – Ameren Missouri filed today with the Missouri Public Service Commission (PSC) requests to adjust its electric and natural gas base rates next year.

The new rates would take effect in 2022 to reflect major upgrades to electric and natural gas system reliability and resiliency for customers, as well as investments to support the transition to cleaner energy for the benefit of customers and local communities.

Ameren Missouri customers have seen rate decreases in recent years, including two electric base rate decreases since 2017 and a natural gas rate decrease in 2019. Electric rates today are 8.3% lower than they were in 2017.

If approved by regulators, the rate adjustment in 2022 would cost an average electric customer about \$12 a month (based on approximately 1,029 kilowatt-hours of usage per month). For Ameren Missouri's natural gas customers, largely located in central and southeast Missouri, the adjustment in base rates would cost about \$4 a month for the average residential customer. If approved, the new electric rate request reflects a 5.4% total increase over an almost five-year period, a yearly average of approximately 1%.

"Customers are experiencing better reliability and benefiting from cleaner energy because of infrastructure upgrades," said **Marty Lyons**, president of Ameren Missouri, a subsidiary of Ameren Corporation, (NYSE: AEE). "Following a thorough review by the PSC, rates reflecting recent electric grid upgrades and new renewable generation won't take effect until 2022. Due to COVID-19, we delayed our rate review requests associated with these investments. We've also been reducing our expenses to keep costs as low as possible, which is why our electric rates are well below the average in other Midwest states and across the country, and are positioned to remain relatively low even after this adjustment."

Lyons said Ameren Missouri's investments have made a difference for customers. For example, Ameren Missouri has accelerated smart technology upgrades, which are delivering up to 40% improvement in reliability on circuits with the new technology. The value of these investments was also demonstrated by the company's system performance during the extremely cold weather in February that stressed the electric grid



and natural gas systems in parts of the United States.

"As the weather created challenges in several areas of the country, Ameren Missouri did not experience any significant reliability issues," Lyons said. "Investments in infrastructure pay off every day for our customers in terms of improved system performance and reliability. We are seeing fewer outages with shorter durations."

"We're working to keep rates as low as possible, while building a stronger, smarter and cleaner energy system for our customers," said **Warren Wood**, vice president of regulatory and legislative affairs at Ameren Missouri. "That means making necessary and prudent investments in the system our customers depend on, while continuously finding ways to reduce our operational costs. Finding the right balance is critical to meeting the needs of our customers today, while transitioning to a stronger, smarter, cleaner, more reliable and resilient grid for future generations."

Key components of the rate review requests include:

- **Eliminating processing fees** for customers paying their energy bills by credit card, saving those customers approximately \$1.10-\$1.85 per transaction.
- **Strengthening the grid** through [Ameren Missouri's Smart Energy Plan](#), including infrastructure upgrades bolstering reliability and resiliency, more renewable generation, installation of smart meters, and the addition of programs to stimulate economic growth for communities across the state.
- **Investing in [state-of-the-art wind generation](#)**, including the acquisition of the Missouri-based High Prairie and Atchison renewable energy centers that make Ameren Missouri the largest operator of wind generation in the state.
- **Advancing the retirement of coal-fired energy centers**, while ensuring the energy system remains reliable and resilient.
- **Expanding [rate options](#) to offer choices** that fit a customer's lifestyle, thanks to how smart meters communicate with the updated grid. Customer benefits include the opportunity to save on their bill by using information from their smart meter to help shift the timing of their energy usage, quicker restoration after outages and faster connection when moving or starting service.
- **Making Ameren Missouri's popular [Community Solar](#) program permanent** and allowing eligible customers to enroll up to 100% of their energy use in the program at a locked-in rate. The expanded solar program also works in step with new rate options enabled by the smart meters Ameren Missouri is installing.
- **Enhancing Ameren Missouri's natural gas infrastructure** system to increase safety, efficiency and resiliency.

While upgrading the electric grid, Ameren Missouri has been able to keep rates stable and affordable for customers, with residential rates more than 20% below national and Midwest averages, according to the Edison Electric Institute Typical Bills and Average Rates Report. Ameren Missouri has reduced electric rates in two previous rate adjustments – a 6% reduction in 2018 and a 1.5% reduction in 2020. The last natural gas rate review occurred in 2019 and resulted in a 1.34% rate decrease.

To help customers who have faced financial hardship due to the COVID-19 pandemic, Ameren Missouri provided \$5 million in energy assistance to families across the state and



NEWS RELEASE

voluntarily enacted a moratorium on disconnections in 2020. Ameren Missouri continues to offer energy assistance grants and flexible payment options for those struggling to pay their bills. Ameren Missouri also is helping customers gain access to critical government and community assistance funding programs through the Low Income Home Energy Assistance Program (LIHEAP).

"We know there are many families who have been deeply impacted by the pandemic and need help to make ends meet," Lyons said. "We care about our customers and want them to know we are here to help in this critical time of need. Any customers struggling to pay their bills should contact us today for access to energy assistance grants and to arrange flexible payment options."

Ameren Missouri's request will be carefully reviewed by the PSC and many other stakeholders during a process that can take up to 11 months. A decision by the PSC on this rate adjustment is expected with new rates effective early next year.

Ameren Missouri has been providing electric and gas service for more than 100 years, and the company's electric rates are among the lowest in the nation. Ameren Missouri's mission is to power the quality of life for its 1.2 million electric and 134,000 natural gas customers in central and eastern Missouri. The company's service area covers 64 counties and more than 500 communities, including the greater St. Louis area. For more information, visit Ameren.com/Missouri or follow us on Twitter at [@AmerenMissouri](https://twitter.com/AmerenMissouri) or [Facebook.com/AmerenMissouri](https://facebook.com/AmerenMissouri).

###