



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.: ER-2021-0240

Dear Mr. Woodruff:

Filed concurrently with this letter is a separate letter with which is included certain tariff sheets consisting of electric rate schedules designed to increase Ameren Missouri's electric base rate annual revenues by approximately \$299 million. The above-cited figures are 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 several factors. These include investments in the Ameren Missouri system as part of its Smart Energy Plan ("SEP"), and the addition of two wind production facilities used for compliance with Missouri's Renewable Energy Standard, the High Prairie and Atchison Energy Centers. In addition, consistent with the Company's Preferred Resource Plan filed in the Company's 2020 Integrated Resource Plan ("IRP") filing in File No. EO-2021-0021, the depreciation rates for the Sioux and Rush Island coal generation facilities are reset so that they align with the now earlier expected retirement dates for those plants. This filing incorporates other changes in the Company's revenue requirement since base rates were last reset.

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. To reflect changes in net base energy costs, rate base, and other operating and maintenance expenses, to continue the Company's fuel adjustment clause, and to make changes to rate design offerings for customers.

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
Nicolas Bowden, PhD	Weather Normalization; Rates; Community Solar Program Tariff
Ann E. Bulkley	Return on Equity
Tom Byrne	Rate Case Expense
Ahmad Faruqui, PhD	Rate Design
Michael Harding	Rate Design; Tariff Changes
Thomas Hickman	Class Cost of Service Study
Mitchell Lansford	Revenue Requirement; Lead/Lag Study
Andrew Meyer	Fuel Adjustment Clause
Laura M. Moore	Affiliate Transactions
Annemarie Nauert	Community Solar Program
Mark J. Peters	Production Cost Modeling
John J. Reed	Affiliate Transactions
Darryl T. Sagel	Capital Structure; Overall Rate of Return
John J. Spanos	Depreciation Study
Steven M. Wills	Rate Design; Rate Cap; RESRAM Rebase

Also included with this letter is a verification as required by 20 CSR 4240-22.080(18) and Section 393.1650, RSMo.

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 undersigned counsel for Ameren Missouri at the address listed in the letterhead above, and also 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@jbllawllc.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| **Wendy K. Tatro**

Wendy K. Tatro

Director & Assistant General Counsel

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

UNION ELECTRIC COMPANY
d/b/a Ameren Missouri
Missouri Electric Operations
Aggregate Annual Increase

The aggregate annual increase from current revenues produced by current base rates which the tariffs propose is \$299,371,379*, which is an overall increase of approximately 11.97% on a pro forma basis.

The tariffs also rebase net energy costs to reflect anticipated changes in the net energy costs currently included in base rates, which absent the filing of this rate increase request, would have been included in periodic adjustments under Ameren Missouri's existing fuel adjustment clause (Rider FAC). Ninety-five percent of future increases or decreases in net energy costs will continue to be recovered (or returned), in addition to base rates, through Rider FAC.

*The targeted increase in base revenues from Ameren Missouri witness Mitchell Lansford's direct testimony is \$299,468,000; however, after rate rounding the tariffs are designed to produce increased revenues of \$299,371,379, or \$96,621 less than stated in Mr. Lansford's testimony.

UNION ELECTRIC COMPANY
d/b/a Ameren Missouri
Missouri Electric Operations
AMEREN MISSOURI – COUNTIES SERVED – ELECTRIC

ADAIR	GENTRY	PEMISCOT
AUDRAIN	HOWARD	PETTIS
BOLLINGER	IRON	PIKE
BOONE	JEFFERSON	RALLS
CALDWELL	KNOX	RANDOLPH
CALLAWAY	LEWIS	RAY
CAMDEN	LINCOLN	REYNOLDS
CAPE GIRARDEAU	LINN	ST. CHARLES
CARROLL	LIVINGSTON	ST. FRANCOIS
CHARITON	MADISON	STE. GENEVIEVE
CLARK	MARIES	ST. LOUIS CITY
CLAY	MARION	ST. LOUIS COUNTY
CLINTON	MILLER	SALINE
COLE	MISSISSIPPI	SCHUYLER
COOPER	MONITEAU	SCOTLAND
CRAWFORD	MONROE	SCOTT
DAVISS	MONTGOMERY	STODDARD
DEKALB	MORGAN	SULLIVAN
DUNKLIN	NEW MADRID	WARREN
FRANKLIN	OSAGE	WASHINGTON
GASCONADE		

UNION ELECTRIC COMPANY
d/b/a Ameren Missouri
Missouri Electric Operations

AMEREN MISSOURI – COMMUNITIES SERVED – ELECTRIC

Affton	Bel-Nor	Bucoda
Alexandria	Bel-Ridge	Buell
Allenton	Benton	Bunceton
Altamont	Benton City	Byrnes Mill
Amity	Berger	Cadet
Annada	Berkeley	Cairo
Anniston	Bernie	Caledonia
Antonia	Bertrand	Calverton Park
Arbyrd	Beverly Hills	Canaan
Arcadia	Big Spring	Canady
Argyle	Bismarck	Canalou
Arnold	Black Jack	Canton
Ashburn	Blackwater	Cape Girardeau
Ashland	Blackwell	Cardwell
Ashley	Bland	Carsonville
Athens	Blodgett	Caruth
Augusta	Bonne Terre	Caruthersville
Auxvasse	Bonnots Mill	Catawissa
Bagnell	Boonville	Catron
Ballwin	Bowling Green	Cave
Baring	Bragg City	Cave Springs
Barnett	Braggadocio	Cedar Hill
Barnhart	Brashear	Center
Belgrade	Brasher	Centertown
Bella Villa	Braymer	Chaffee
Bellair	Breckenridge	Chain of Rocks
Belle	Breckenridge Hills	Chamois
Bellefontaine Neighbors	Brentwood	Champ
Bellerive	Bridgeton	Charlack
Belleview	Bridgeton Terrace	Charleston
Bellflower	Brookfield	Chesterfield

UNION ELECTRIC COMPANY
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Missouri Electric Operations

AMEREN MISSOURI – COMMUNITIES SERVED – ELECTRIC

Clark	Deering	Fairport
Clarksburg	Defiance	Fairview Acres
Clarkson Valley	Dellwood	Farber
Clarksville	Delta	Fenton
Clarkton	Des Peres	Ferguson
Clayton	Desloge	Festus
Clifton Hill	De Soto	Flamm City
Commerce	Dexter	Fletcher
Concord	Dittmer	Flint Hill
Concord Hill	Doe Run	Flordell Hills
Cool Valley	Downing	Florence
Cooter	Dutchtown	Florissant
Corso	Dutzow	Foley
Cottleville	East Prairie	Foristell
Country Club Hills	Edgewood	Fortuna
Country Life Acres	Edina	Four Seasons
Cowgill	Edmundson	Frankclay
Crestwood	Eldon	Frankford
Creve Coeur	Ellisville	Franklin
Crowder	Elmira	Freeburg
Crystal City	Elsberry	Frontenac
Crystal Lake Park	Elston	Gasconade
Crystal Lakes	Eolia	Gerald
Curryville	Essex	Gibbs
Cyrene	Esther	Gibson
Danville	Estill	Gideon
Dardenne Prairie	Ethlyn	Gilmore
Davis	Eugene	Glen Echo Park
Dawn	Eureka	Glencoe
De Lassus	Ewing	Glendale
Deer Run	Excelsior Springs	Gordonville

UNION ELECTRIC COMPANY
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Missouri Electric Operations

AMEREN MISSOURI – COMMUNITIES SERVED – ELECTRIC

Gorin	Holland	Klondike
Graniteville	Holliday	Knob Lick
Grantwood Village	Hollywood	Knox City
Gray Summit	Holstein	Koeltztown
Green Castle	Holt	Labadie
Green City	Holts Summit	La Belle
Green Park	Hornersville	Laddonia
Greendale	Huntleigh	Ladue
Greentop	Huntsville	LaGrange
Grubville	Hurdland	Lake MyKee
Hallsville	Ilasco	Lake Ozark
Hamilton	Illmo	Lakeland
Hanley Hills	Iron Mountain Lake	Lakeshire
Hartsburg	Irondale	Lakeside
Harvester	Ironton	Lakeview
Hawk Point	Jamestown	Lambert
Hayti	Jefferson City	Lathrop
Hayti Heights	Jennings	Latty
Haywood City	Jonesburg	Lawson
Hazelwood	Josephville	Leadington
Hematite	Kaiser	Leadwood
Henke	Kampville	Leslie
Henley	Kearney	Lewistown
Herculaneum	Kelso	Liberty
Higbee	Kidder	Libertyville
High Hill	Kimmswick	Liguori
High Ridge	Kingdom City	Lilbourn
Highley Heights	Kingston	Linn
Hillsboro	Kinloch	Linn Creek
Hillsdale	Kirksville	Lohman
Holcomb	Kirkwood	Lonedell

UNION ELECTRIC COMPANY
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Missouri Electric Operations

AMEREN MISSOURI – COMMUNITIES SERVED – ELECTRIC

Loose Creek	Miner	North Lilbourn
Louisiana	Mineral Point	North Wardell
Ludlow	Mirabile	Northwoods
Luebbering	Moberly	Norwood Court
Luray	Mokane	Noser Mill
MacKenzie	Moline Acres	Novinger
Madison	Montgomery City	Oakland
Manchester	Mooreville	Oakville
Mapaville	Morehouse	Oermann
Maplewood	Morley	O'Fallon
Marlborough	Morrison	Old Mines
Marston	Morse Mill	Old Monroe
Marthasville	Mosby	Olean
Martinsburg	Moscow Mills	Olivette
Marys Home	Moselle	Olney
Maryknoll	Mt Sterling	Olympian Village
Maryland Heights	Murphy	Oran
Matson	Nelson	Orchard Farm
Matthews	Nettleton	Osage Beach
Maxville	New Bloomfield	Osage City
Maysville	New Court	Osborn
McFall	New Florence	Otterville
McGirk	New Franklin	Otto
McKittrick	New Hartford	Overland
Mehlville	New Haven	Owensville
Meta	New Hope	Pacific
Mexico	New London	Pagedale
Middle Brook	New Melle	Park Hills
Middletown	New Truxton	Parkdale
Millard	Newark	Parkway
Mineola	Normandy	Parma

UNION ELECTRIC COMPANY
d/b/a Ameren Missouri
Missouri Electric Operations

AMEREN MISSOURI – COMMUNITIES SERVED – ELECTRIC

Pasadena Hills	Rosebud	St. Thomas
Pasadena Park	Rush Hill	Stark
Paynesville	Russellville	State Line
Peerless Park	Rutledge	Steele
Peers	Santa Rosa	Stephens
Pendleton	Saverton	Stover
Peruque	Schubert	Sturgeon
Pevely	Scott City	Sublette
Pilot Grove	Scottsdale	Sulphur Springs
Pilot Knob	Selma	Sunset Hills
Pine Lawn	Senath	Sycamore Hills
Piney Park	Shrewsbury	Syracuse
Plattsburg	Silex	Taos
Polo	Smithton	Tenbrook
Portage Des Sioux	Speed	Thompson
Portageville	Spring Town	Tiff
Potosi	South Gorin	Tipton
Prairie Home	St. Albans	Town & Country
Prathersville	St. Ann	Townley
Queen City	St. Catherine	Treloar
Rayville	St. Charles	Troy
Renick	St. Clair	Truesdale
Revere	St. Clement	Truxton
Rhineland	St. Elizabeth	Turney
Rich Fountain	St. Francisville	Turpin
Richmond Heights	St. George	Tuscumbia
Richwoods	St. John	Twin Oaks
Risco	St. Louis	Union
Riverview	St. Martins	University City
Rock Hill	St. Paul	Uplands Park
Rockview	St. Peters	Utica

UNION ELECTRIC COMPANY
d/b/a Ameren Missouri
Missouri Electric Operations

AMEREN MISSOURI – COMMUNITIES SERVED – ELECTRIC

Valles Mines	Wardsville	Westphalia
Valley Park	Ware	Westwood
Vandiver	Warrenton	Whiteside
Vanduser	Warson Woods	Whiting
Velda City	Washington	Wilbur Park
Velda Village Hills	Wayland	Wildwood
Versailles	Weatherby	Williamsburg
Vibbard	Weber Hill	Winchester
Viburnum	Webster Groves	Winfield
Victoria	Weldon Spring	Winston
Vienna	Weldon Spring Heights	Wood Heights
Villa Ridge	Wellston	Woodson Terrace
Vinita Park	Wellsville	Wright City
Vinita Terrace	Wentzville	Wyaconda
Wardell	West Alton	

UNION ELECTRIC COMPANY
d/b/a Ameren Missouri
Missouri Electric Operations
Number of Customers Affected by General
Category of Service and Rate Classification
As of December 31, 2020

<u>Service and Rate Classification*</u>	<u>Number of Customers</u>
Residential Service	1,078,424
Small General Service	141,522
Large General Service	10,673
Small Primary Service	666
Large Primary Service	64
Lighting Service – Company Owned	53,100
Lighting Service – Customer Owned	1,624
TOTAL CUSTOMERS	1,286,072

*Ameren Missouri's general categories of service and rate classifications for electric service are the same as the Company's last electric rate case, File No. ER-2019-0335, except the Company proposes in this case to eliminate the 12(M) rate class which has no customers in it.

UNION ELECTRIC COMPANY
d/b/a Ameren Missouri
Missouri Electric Operations
Proposed Average Annual Change Per Customer Requested in Dollars
and Percentage Change from Current Base Rates

Service and Rate Classification*	Average Annual Change	Percentage Change
Residential Service	\$141.33	11.97%
Small General Service	231.86	11.96%
Large General Service	\$5,681.06	11.96%
Small Primary Service	\$39,502.29	11.94%
Large Primary Service	\$352,713.98	11.97%
Lighting – Company Owned	\$79.19	11.80%
Lighting – Customer Owned	\$251.46	14.34%

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UNION ELECTRIC COMPANY
d/b/a Ameren Missouri
Missouri Electric Operations
Proposed Annual Aggregate Change and
Percentage Change in Revenues from Current Base Rates

Service and Rate Classification*	Annual Aggregate Change (in \$000's)	Percentage Change
Residential Service	\$152,417	11.97%
Small General Service	\$32,813	11.96%
Large General Service	60,633	11.96%
Small Primary Service	26,312	11.94%
Large Primary Service	22,574	11.97%
Lighting - Company Owned	4,205	11.80%
Lighting – Customer Owned	408	14.34%
TOTAL**	\$299,371	11.97%

*Ameren Missouri's general categories of service and rate classifications for electric service are the same as the Company's last electric rate case, File No. ER-2019-0335, except the Company proposes in this case to eliminate the 12(M) rate class which has no customers in it.

**The targeted base revenues from Ameren Missouri witness Mitchell Lansford's direct testimony are \$299,468,000; however, after rate rounding the tariffs are designed to produce increased revenues of \$299,371,379, or \$96,621 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.

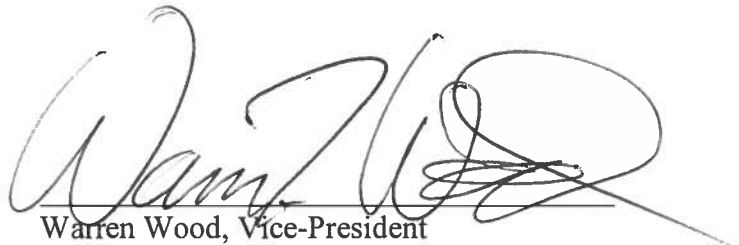
Ameren Missouri has been providing electric and gas service for more than 100 years, and the company's electric rates are among the lowest in the nation. Ameren Missouri's mission is to power the quality of life for its 1.2 million electric and 134,000 natural gas customers in central and eastern Missouri. 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).

###

VERIFICATION

This undersigned states that this request is substantially consistent with the preferred resource plan specified in the most recent triennial compliance filing made by Ameren Missouri. 20 CSR 4240-22.080(18).

The undersigned further states that Ameren Missouri is using a qualification process for the competitive bidding of construction and construction-related services for distribution system projects required by Section 393.1650, RSMo. (Cum. Supp. 2020) for no less than ten percent of the combined external installation expenditures it has made in Missouri for construction and construction-related services for distribution system projects, and that its process conforms with the requirements of Section 393.1650.

A handwritten signature in black ink, appearing to read 'Warren Wood', written over a horizontal line.

Warren Wood, Vice-President
Regulatory and Legislative Affairs
Union Electric Company d/b/a Ameren Missouri