

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 0102.5

Refer to spreadsheet provided as first supplement to DR 102. Please identify and describe the customer request underlying each of the following "Project Descriptions," including, but not limited to a description of the work done, the assets involved (preferably by retirement unit), the customer making the request, and the rate schedule and voltage under which the customer is served: 0C126 , 0C226 , 0C326 , 0C426 , 0C526 , 0C726 , 0C826 , J007C . Please identify any CIAC or other payment including payments in kind made in connection to these projects. Sarah Lange (sarah.lange@psc.mo.gov)

RESPONSE

Prepared By: Stephanie Renner
Title: Supervisor Capital Planning & Analysis
Date: 7/23/21

Subject to the Company's objections, projects 0C126, 0C226, 0C326, 0C426, 0C526, 0C726, 0C826, and J007C are standing work orders, which fund jobs under \$100,000 within their respective divisions for Customer Requested work. These standing work orders have combined for nearly \$12M from January 2019 through February 2021. Due to the volume of jobs funded by these standing work orders, a breakout of assets, customers, rate schedule, voltage, and CIAC payments is not available.

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In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues
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No.: MPSC 0102.6

Refer to spreadsheet provided as first supplement to DR 102. Please identify and describe the new business underlying each of the following "Project Descriptions," including, but not limited to a description of the work done, the assets involved (preferably by retirement unit), the customer(s) to be served, and the rate schedule and voltage under which the customer(s) will be served: 0C101 , 0C201 , 0C301 , 0C401 , 0C501 , 0C701 , 0C801 , J007N , J0DBD , J0GN5 , J0KBF , J0Q5G . Please identify any CIAC or other payment including payments in kind made in connection to these projects. For each project, please identify the number of miles of network system installed, separately identifying portions underground and overhead, and the number of feet of services installed, separately identifying portions underground and overhead. Sarah Lange (sarah.lange@psc.mo.gov)

RESPONSE

Prepared By: Stephanie Renner
Title: Supervisor Capital Planning & Analysis
Date: 7/23/21

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

Subject to the Company's objection, for projects J0DBD, J0GN5, J0KBF, and J0Q5G, see attached MPSC 0102.6 Attach Project Detail CONF.

Projects 0C101, 0C201, 0C301, 0C401, 0C501, 0C701, 0C801, and J007N are standing work orders, which fund jobs under \$100,000 within their respective divisions for New Business. These standing work orders have combined for over \$67M from January 2019 through February 2021. Due to the volume of jobs funded by these standing work orders, a breakout of assets, customers, rate schedule, voltage, CIAC payments, and network/services installed is not available.

Missouri Public Service Commission

Data Request

Data Request No.	0611
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	ER-2021-0240
Date Requested	6/17/2021
Issue	General Information & Miscellaneous - Other General Info & Misc.
Requested From	Geri Best
Requested By	Jeff Keevil
Brief Description	Project level cost benefit analysis
Description	Did Ameren conduct any project level cost benefit analysis that demonstrated that the benefits of completing a given project outweighed the costs? If so, please provide all such analysis with workpapers in excel format with links and formulas intact. Provide supporting documentation for any assumptions made. If Ameren did not conduct any project level cost benefit analysis, explain why it is not necessary or reasonable to do so. J Luebbert (J.Luebbert@psc.mo.gov)
Due Date	7/7/2021
Security Rationale	Public NA

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No.: MPSC 0611

Did Ameren conduct any project level cost benefit analysis that demonstrated that the benefits of completing a given project outweighed the costs? If so, please provide all such analysis with workpapers in excel format with links and formulas intact. Provide supporting documentation for any assumptions made. If Ameren did not conduct any project level cost benefit analysis, explain why it is not necessary or reasonable to do so. J Luebbert (J.Luebbert@psc.mo.gov)

RESPONSE

Prepared By: Mark Birk

Title: Senior Vice President Customer and Power Operations

Date: 7/27/21

Please see the response to DR MPSC 612.

From: [Jim Lowery](#)
Sent: Friday, August 13, 2021 3:41 PM
To: [Pringle, Travis](#); [Tatro, Wendy K](#); [Grubbs, Jermaine](#)
Cc: [Myers, Jamie](#); [Keevil, Jeff](#)
Subject: RE: DRs 611 and 612 in ER-2021-0240

Travis:

I think it is appropriate for Staff to send a DR requesting what you are asking for. Thanks.

From: Pringle, Travis <Travis.Pringle@psc.mo.gov>
Sent: Friday, August 13, 2021 2:53 PM
To: Jim Lowery <lowery@jblawllc.com>; Tatro, Wendy K <WTatro@ameren.com>; Grubbs, Jermaine <JGrubbs@ameren.com>
Cc: Myers, Jamie <Jamie.Myers@psc.mo.gov>; Keevil, Jeff <Jeff.Keevil@psc.mo.gov>
Subject: DRs 611 and 612 in ER-2021-0240

Good morning all,

Question from Staff regarding Company responses to DRs 611 and 612. Links to both DRs are below:

DR 611: [Electronic Document \(mo.gov\)](#)

DR 612: [Electronic Document \(mo.gov\)](#)

Staff was expecting data regarding the cost benefit analyses and supporting documentation regarding projects in the Smart Energy Plan. DR 611 pointed back to the response to DR 612, of which the relevant parts are:

“...individual cost and benefit considerations are focused on selecting the project solution that best meets the needs of the system being addressed by the Project. Any project over \$5M is subject to additional review and scrutiny through an Oversight Committee. Projects of this scale are subject to the same scrutiny as all other projects by subject matter experts and category owners, but require additional documentation and discussion around scope, alternative analysis, total project costs, benefits, and contract structure.”

Does the Company intend to supplement the response to DR 612 with information concerning how the Oversight Committee conducts its review? If not, Staff would like to see something detailing the review process, particularly involving the Oversight Committee. Specifically, the requested cost benefit analyses, supporting documentation for any assumptions made, and an explanation of how the cost benefit analyses factored into decisions regarding which projects to include in the Smart Energy Plan.

If the Company prefers Staff file a follow-up DR for that information, we can file one. Just let me know your preference.

Thanks,

Travis Pringle
Missouri Public Service Commission
[Associate Counsel](#)

(573) 751-4140

Travis.Pringle@psc.mo.gov

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In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues
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No.: MPSC 0612

Provide all cost benefit analyses performed by Ameren Missouri regarding the types of projects included in the Smart Energy Plan. Provide supporting documentation for any assumptions made. Explain how the cost benefit analyses factored into decisions regarding which projects Ameren would include in the Smart Energy Plan. J Luebbert (J.Luebbert@psc.mo.gov)

RESPONSE

Prepared By: Mark Birk

Title: Senior Vice President Customer and Power Operations

Date: 7/27/21

As described in the response to DRS MPSC 0606 and 0609, Ameren Missouri relies on subject matter experts and numerous factors to identify and evaluate projects for inclusion in the Smart Energy Plan. Further, the Ameren Missouri system has a substantial need for projects across all functions to continue operation of a safe and reliable system. Given this need, while subject matter experts and category owners consider the costs and benefits, monetary and otherwise, of any project along with many other factors noted in DR MPSC 0606, it is not the only or overriding factor. This allows for more robust decision making to allow for the project that best addresses the needs of the system and customers rather than only projects that fit a quantified formula, which may exclude the best project for Ameren Missouri's customers and the system. An example of a non-quantified factor that category owners consider is the importance of safety and the challenge that comes with accurately quantifying the incremental safety impact of one project over another. Other considerations include avoiding the risk of reliability problems, including outages especially given the overall age of many of the Company's assets.

Once the need for a given project is established, a range of solutions are identified and evaluated to identify the project scope that best addresses the solution for the project, while also factoring costs of the final solution to allow Ameren Missouri to address other needs both within the category and across the system into the final decision. Given that the projects in the Smart Energy Plan are needed for the obligation of providing continued safe and reliable electricity to customers, individual cost and benefit considerations are focused on selecting the project solution that best meets the needs of the system being addressed by the project. Any project over

\$5M is subject to additional review and scrutiny through an Oversight Committee. Projects of this scale are subject to the same scrutiny as all other projects by subject matter experts and category owners, but require additional documentation and discussion around project scope, alternative analysis, total project costs, benefits, and contract structure.

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In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues
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No.: MPSC 0664

By account, and by retirement unit, please identify the assets used for communication and/or operation of remote equipment on the distribution system, including intangible assets. By account, please identify the expenses and revenues associated with the operation and maintenance of these assets, including, if known, property taxes associated with these assets. DR requested by Sarah Lange (sarah.lange@psc.mo.gov).

RESPONSE

Prepared By: Tom Hickman
Title: Regulatory Rate Specialist
Date: July 30, 2021

Subject to the Company's objection, communications equipment is accounted for in FERC Major 397. Please refer to response to DR MPSC 0591 for the specific retirement units included within this account. Associated O&M expenses would be accounted for in 935003 (Admin and Mtce – Communications Equipment) and 930227 (Operations of Communication Equipment) and associated revenues would be accounted for in 454008. A breakdown of property taxes for these specific assets is unavailable.

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In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues
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No.: MPSC 0665

By account, and by retirement unit, please identify the assets used for grid resiliency at substations and on the transmission and distribution systems, including intangible assets. By account, please identify the expenses and revenues associated with the operation and maintenance of these assets, including, if known, property taxes associated with these assets. DR requested by Sarah Lange (sarah.lange@psc.mo.gov).

RESPONSE

Prepared By: Tom Hickman
Title: Regulatory Rate Specialist
Date: 07/30/2021

Subject to the Company's objection, grid resiliency relates to increasing system capacity, whether it is an individual line capacity or overall substation capacity. System hardening can also relate to grid resiliency. As such, almost any asset within the distribution and transmission systems has an impact on grid resiliency. For example, a transformer and cable may be replaced in a specific area to add system capacity. That transformer and cable could be viewed as adding to grid resiliency. However, if a new area of the system is being built, a transformer and cable will be installed contemplating, among other things, grid resiliency. As such, we are unable to identify distribution and transmission assets that are "used for grid resiliency" as almost any asset on those systems could be identified as being used for grid resiliency.