

In the Matter of:
Proposed Revisions To Improve The Commission's Rules

AX-2018-0395 VOL. I

January 29, 2019



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STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

TRANSCRIPT OF PROCEEDINGS
Rulemaking Hearing
January 29, 2019
Jefferson City, Missouri
Volume 1

In The Matter Of Proposed)
Revisions To Improve The) File No. AX-2018-0395
Commission's Rules)

JOHN T. CLARK, Presiding
REGULATORY LAW JUDGE

DANIEL Y. HALL
COMMISSIONER

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P R O C E E D I N G S

1
2 JUDGE CLARK: Good morning. By my watch it is
3 10:00 a.m. So let's go on the record now. Today's date
4 is January 29, 2019, and it is 10:00 a.m. We're in Room
5 310 of the Governor Office Building. The Commission set
6 aside this time for a rule comment hearing in the file
7 captioned as In The Matter Of Proposed Revisions To
8 Improve The Commission's Rules, File No. AX-2018-0395.
9 And that involves rescissions, amendments and a proposed
10 rule involving 4 CSR 240's Chapter 2, 3, 10, and 13,
11 specifically rescissions of 3.015, 3.020, 3.025, 3.180,
12 3.250, amendments of 2.010, 2.070, 2.120, 3.010, 3.030,
13 10.020, 10.040, 13.010, 13.015, 13.020, 13.025, 13.030,
14 13.050, 13.055, 13.070, and a proposed Rule 4 CSR
15 240-2.205.

16 I'm going to remind the parties when they're
17 speaking today to use the microphone. My name is John
18 Clark. I'm the Regulatory Law Judge assigned to this
19 matter. To my right is Commissioner Hall on behalf of
20 the Commission.

21 I'm going to begin by asking the attorneys to
22 enter their appearance for the record starting with
23 Commission Staff?

24 MR. PRINGLE: Good morning, Judge. Good
25 morning, Commissioner Hall. My name is Travis Pringle.

1 I am Legal Counsel for the Staff of the Missouri Public
2 Service Commission. Staff filed our comments to this
3 case on January 18, and I have with me Jamie Myers for
4 any questions about those comments.

5 JUDGE CLARK: Thank you. From the Office of
6 the Public Counsel?

7 MR. HALL: Good morning. Caleb Hall appearing
8 on behalf of the Office of Public Counsel.

9 JUDGE CLARK: Ameren Missouri?

10 MS. JOHNSON: Paula Johnson appearing on
11 behalf of Union Electric Company d/b/a Ameren Missouri.

12 JUDGE CLARK: And Kansas City Power & Light
13 and GMO?

14 MR. FISCHER: On behalf of those companies,
15 James M. Fischer, and I've given my contact information
16 to the reporter.

17 JUDGE CLARK: Okay. Thank you all. I'm going
18 to remind you that this is not a contested case. It's a
19 rule comment hearing. So there's no cross-examination
20 from the parties. The Commission, however, may question
21 witnesses. If you testify, before you start testifying
22 please be sure to state your name and your position, and
23 nobody has really deemed an order for comments. I liked
24 the order on yesterday's hearing that I sat in on. So
25 why don't we start with the Commission Staff.

1 MS. MYERS: Thank you, Judge. My name is
2 Jamie Myers. I'm the Commission Staff Deputy Director.
3 I appreciate those who have filed comments and those who
4 have attended today. This rulemaking is part of the
5 larger rule review process that was under Executive
6 Order 17-03. The intent of these rulemakings was to
7 improve the Commission's rules, to streamline, to
8 simplify, also to make any noted updates that we found
9 as going through that rule review process. That's what
10 we're here for today.

11 I appreciate the comments that have been
12 filed, because I think there's some additional things we
13 can do and corrections we can make. With that, what I
14 would do is start with the Office of the Public
15 Counsel's filed comments.

16 OPC filed comments noting two specific things.
17 It's in paragraph 2 and 3 of their filed comments.
18 Paragraph 2, OPC recommends that the reference that
19 Staff is recommending to update in Chapter 3, it's
20 3.010, it was an incorrect reference. Instead of trying
21 to nail down the statutory definition to the specific
22 cite to just say as defined in Section 386.020, Staff
23 would be fine with that. I think that's in line with as
24 we start, you know, moving things out of Chapter 3 and
25 putting them in their specific utility chapters that

1 makes sense to just do 386.020. So Staff is fine with
2 that recommendation. As well as OPC made a suggestion
3 in paragraph 3 noting what was a spelling typo error.
4 So instead of "serves known to the utilities" it should
5 be "services known to the utilities." OPC was correct
6 in noting that typo.

7 And then Ameren Missouri filed comments, as
8 well as Spire Missouri filed comments last night. Spire
9 Missouri's comments just said that they supported Ameren
10 Missouri's comments. So as I walk through Ameren
11 Missouri's comments, I'll also be responding to Spire
12 Missouri as well.

13 And so Ameren Missouri's filed comments
14 provided thoughts on several rules, and I will start on
15 page 2 of Ameren Missouri's filed comments. It's
16 paragraph 6 where they start noting specific
17 recommendations. So in terms of 2.010, Staff had
18 recommended updating the definition of Staff Counsel.
19 Ameren Missouri had some additional language thoughts on
20 that.

21 Staff suggests that we go with Staff's
22 original proposal on that. It merely defines Staff
23 Counsel as any attorney employed to represent the
24 commission staff in proceedings before the commission.
25 Ameren was suggesting holding on to some of the original

1 language in that definition, as well as expounding on
2 that. I don't think that's necessary. The original
3 language was trying to differentiate Staff Counsel when
4 Staff Counsel was part of General Counsel's Office.
5 Because Staff Counsel is a separate entity now, that
6 original language isn't needed. So I don't think
7 holding on to some of that original language and
8 expounding on it is necessary.

9 And then moving on to paragraph 7 of Ameren's
10 comments. In paragraph 7, Ameren offers two comments on
11 the same rule. It's 2.070. It's the complaints rule.
12 For (8), Ameren suggests modifying the language. Staff
13 had attempted to simplify the service language tying
14 service to the Supreme Court Rule 54. What Ameren is
15 suggesting here is that utilities can receive email
16 notification and therefore it's not necessary to do this
17 certified mail Supreme Court Rule 54. While I
18 understand that and I acknowledge that's true for many
19 utilities, I don't think that's true for all utilities.

20 I think we have to have this rule that would
21 apply to all the utilities we regulate. And so simply
22 having these two different standards where a utility is
23 served via email or EFIS by the counsel of record of the
24 complaint, I think that opens up the door to counsel on
25 what record, record in what case. Not every single one

1 of our utilities is a large corporation that has in
2 house counsel on record, that sort of thing. So I think
3 going back to Staff's original proposed language tying
4 service to service under Supreme Court Rule 54 is
5 Staff's recommendation.

6 COMMISSIONER HALL: Refresh my recollection
7 what is Supreme Court Rule 54 language?

8 MS. MYERS: There's a lot of language in
9 Supreme Court Rule 54. I think there's 14 subparts.
10 Yeah, there's 14 subparts to it.

11 COMMISSIONER HALL: Related to service?

12 MS. MYERS: Correct.

13 COMMISSIONER HALL: Okay. All right. Keep
14 going. I'm sorry.

15 MS. MYERS: That's okay. And then Ameren's
16 comments on 2.070 (15)(D) was the comment on Staff's
17 suggestion about removing the language that has in some
18 instances been interpreted as not allowing Staff to take
19 a position in a small formal complaint. Again, it
20 wasn't interpreted that way in every case, but in some
21 it has. Staff suggested removing that language to
22 allowing Staff when it does an investigation to
23 ultimately make a recommendation to the Commission.

24 I think Ameren's comment here it says that
25 language should remain because it believes the default

1 Staff position as a neutral party in these sort of
2 proceedings is important. I would counter that with
3 saying removing this language does not change Staff's
4 position as the neutral party. Staff is always the
5 neutral party in these proceedings, but it would allow
6 Staff to ultimately say these are the facts, this is the
7 conclusion, and this ultimately we think is a
8 recommendation. We're still the neutral party not
9 representing any particular interests in the case, but
10 it would allow -- again, it would give the Commission an
11 additional recommendation in the case which I see
12 valuing.

13 COMMISSIONER HALL: You note that there's been
14 inconsistent interpretation of that provision and I
15 think that is true. At times Staff has come very close
16 if not actually made recommendations in some of those
17 cases; is that true?

18 MS. MYERS: I would agree with that, yes.

19 COMMISSIONER HALL: And so under this language
20 it would be Staff's view that it would be appropriate
21 for Staff to make recommendations in all of these small
22 complaint cases?

23 MS. MYERS: Yeah, that's the intent with this
24 recommended change.

25 COMMISSIONER HALL: Okay. And I would agree

1 with that completely. Thank you.

2 JUDGE CLARK: With a lot of these I've seen
3 where I've asked for briefs Staff has asked to be
4 excused from briefing for precisely the reason that they
5 tell me their brief isn't going to be more than their
6 filed report.

7 MS. MYERS: Correct.

8 COMMISSIONER HALL: I'll note there's been a
9 number of times when I've been frustrated why isn't
10 Staff giving us a recommendation, and then I come to the
11 realization oh, well, they don't think they can.

12 MS. MYERS: Right. We wouldn't have that
13 excuse any more.

14 JUDGE CLARK: Go on.

15 MS. MYERS: Moving on to paragraph 8. This
16 involves Chapter 3. Actually it's moving on to
17 paragraph 9. Paragraph 8 is just a general heading.

18 Paragraph 9 is a comment on 3.030. Staff had
19 made some recommendations on the Minimum Filing
20 Requirements for Utility General Rate Increases. I
21 think Ameren Missouri and Spire Missouri had some good
22 thoughts on here in ways the language could be modified.
23 However, I would suggest modifying it in a slightly
24 different way. So what Staff had recommended in section
25 (3) here was to remove the requirements, and I think

1 it's a requirement that is an outdated thing where 14
2 copies would be filed with the Commission which isn't
3 necessary. However, noted not everyone files hard
4 copies with the Commission. Electronic filing is a
5 thing. So I think the rule could be general enough that
6 it would contemplate either filing of hard copies or
7 electronically.

8 So Staff would suggest that the language read
9 on section (3): That at the time a tariff is filed by a
10 company or utility subject to this rule which contains a
11 general rate increase, one copy of the following
12 information shall be filed with the Secretary of the
13 Commission and one copy shall be provided to the Office
14 of the Public Counsel. And note I'm also changing that
15 to one copy for the Office of the Public Counsel. I've
16 previously discussed this with Caleb Hall of the Office
17 of the Public Counsel. He didn't see any concern with
18 OPC receiving one copy. And again, I think this
19 language here contemplates either an electronic filing
20 or a hard paper filing, as well as whether OPC would
21 receive a hard copy or an electronic copy. I think it's
22 general enough that either could happen.

23 JUDGE CLARK: Why are you wanting to remove
24 the word request from there?

25 MS. MYERS: I did not mean to. And so if I

1 am, that was a misstatement on my part.

2 JUDGE CLARK: Okay.

3 MS. MYERS: Okay.

4 COMMISSIONER HALL: What is wrong with the
5 language proposed by Ameren?

6 MS. MYERS: The way I read Ameren's language
7 is it only contemplates EFIS filing.

8 COMMISSIONER HALL: Okay.

9 MS. MYERS: So that's why I was thinking --
10 and I think EFIS is traditionally how things are filed,
11 though I do think at times hard copies are filed. So
12 writing the rule general enough to contemplate both was
13 my thought there.

14 COMMISSIONER HALL: So would it be clearer if
15 it expressly said you could do both?

16 MS. MYERS: That would work as well.

17 COMMISSIONER HALL: So you could take Ameren's
18 language and say or one copy to Staff and one copy, one
19 hard copy to OPC?

20 MS. MYERS: Uh-huh, and I think it would be
21 one copy to the Secretary of the Commission and one hard
22 copy to OPC.

23 Staff's next comment is paragraph 12 of Ameren
24 Missouri's filed comments, page 6. Here Ameren Missouri
25 is commenting on Chapter 13. It's 015 Definitions.

1 This first comment is in regards to (1)(A). Ameren
2 Missouri suggests in their comments that they don't
3 object to Staff's proposed changes, but they note that
4 maybe clarifications are needed. Staff would counter
5 that those clarifications aren't necessarily needed. So
6 the language Ameren is proposing to add here in (1)(A),
7 I think that language is already covered if you look at
8 13.010, specifically Section (4) I think already
9 encompasses what Ameren Missouri is suggesting in this
10 additional clarification.

11 COMMISSIONER HALL: I'm sorry. Where is that
12 language?

13 MS. MYERS: Chapter 13.010 Section (4).

14 JUDGE CLARK: Go ahead.

15 MS. MYERS: Ameren noted in (1)(G) of that
16 same Rule 13.015 that Staff's proposed language, there
17 was an apparent conflict. Staff would agree with that.
18 So what Staff would suggest would either don't change
19 the language or should the language need a
20 clarification, we can offer additional proposed
21 language.

22 COMMISSIONER HALL: So Ameren's proposal that
23 the existing rule be retained with no revision Staff is
24 comfortable with?

25 MS. MYERS: We are.

1 JUDGE CLARK: You may continue.

2 MS. MYERS: Okay. The next response would be
3 to paragraph 13. This is on Rule 13.030. Ameren made
4 some comments here on modifications to the proposed
5 language. Staff agrees with some of those modifications
6 but would suggest additional modifications to Ameren's
7 language. So on page 8 Ameren provides this language.

8 Staff would suggest that instead of citing to
9 the specific rule it should read unless prohibited by
10 this chapter, a customer who is unable to pay for the
11 entire deposit for gas or electric service. Staff is
12 also okay with the additional stricken language that
13 Ameren has provided there.

14 Lastly would be to paragraph 14. Ameren noted
15 that instead of simply referencing a rule over and over
16 it could be simplified to stating this regulation
17 throughout the rule. Staff is fine with that.

18 JUDGE CLARK: That's somewhat consistent with
19 what you just suggested previously?

20 MS. MYERS: Correct.

21 JUDGE CLARK: Are those all of Staff's
22 responses to filed comments?

23 MS. MYERS: They are.

24 JUDGE CLARK: Thank you. From the Office of
25 the Public Counsel? Hold on just a second. Are there

1 any other questions from the Commission? The Office of
2 the Public Counsel?

3 MR. HALL: Good morning. Thank you for
4 providing the Office of the Public Counsel this avenue
5 to provide comments on the Commission's rule revisions.
6 The comments that we filed on the 18th of January only
7 addressed two minor points within Staff's revisions with
8 the understanding that the Commission drafted rules
9 largely in response to the former Governor's Executive
10 Order to streamline and consolidate existing rules.

11 We only noted that one citation to an existing
12 statute could be improved such that if future revisions
13 of that statute occurred down the street at the General
14 Assembly we need not amend our rules everytime. And we
15 noticed what we thought to be a typo.

16 Beyond those two comments, we would like to
17 take the time to respond to Ameren's filed comments and
18 Spire's concurrence in support of Ameren's comments.

19 JUDGE CLARK: Please go ahead.

20 MR. HALL: As to Ameren's suggested change to
21 Staff's proposed revision to the Chapter 2 Section 10
22 Definitions section, we believe that Staff's proposed
23 language of the definition of Staff Counsel maintains
24 their independence. However, if Ameren's concerns are
25 to be better addressed, we would suggest that the

1 language that Staff Counsel operates independent is
2 taken out of the definition and put into a separate
3 subsection and that's just merely in the nature of from
4 a drafting standpoint we believe that operative language
5 should not be couched inside a definition section. As
6 to -- pardon me.

7 COMMISSIONER HALL: So I'm not sure I track
8 that. Are you comfortable with Staff's -- with the
9 original language?

10 MR. HALL: Yes.

11 COMMISSIONER HALL: Okay. Thank you.

12 JUDGE CLARK: Staff had indicated that much of
13 the proposed changes made by Ameren Missouri related to
14 back when Staff Counsel's Office was part of the General
15 Counsel's Office. So is the secondary functions
16 independently, is that even necessary?

17 MR. HALL: Based on Staff's comments, I don't
18 believe so. But if the Commission did wish to assuage
19 Ameren Missouri's concerns, we just offer in the
20 alternative that that be removed from the definitions
21 section and then be prominently displayed in some
22 subsection. That's merely just a stylistic point.

23 JUDGE CLARK: Okay. Thank you.

24 MR. HALL: Moving on to Ameren Missouri's
25 suggestions for changes to Section 70 of Chapter 2 on

1 the complaints regulation. Ameren Missouri seems to be
2 concerned that Staff would be losing its status as
3 neutral party if it was somehow getting an indication of
4 how a complaint would proceed. OPC notes the
5 paradoxical nature of if Commission Staff does take a
6 position as to whether a complaint should proceed or
7 not. That nature in and of itself is taking a position
8 of at least some kind. So we think Staff's revisions
9 are fair and understandable.

10 OPC would note that just because a party
11 starts out as a neutral arbitrator in a dispute does not
12 mean that they don't ultimately make a decision. So we
13 think the Staff's revisions are rather not necessary --
14 are -- pardon me. I'm losing my verbiage today. I'm
15 losing my --

16 JUDGE CLARK: It sounds like you're saying
17 that it helps clarify a wider position for them.

18 MR. HALL: Yes, thank you, Your Honor.

19 COMMISSIONER HALL: Are you referring to
20 (15)(D) or (8)?

21 MR. HALL: Pardon me. (15)(D), yes.

22 COMMISSIONER HALL: I'm with you then.

23 MR. HALL: Moving on to subparagraph 9 of
24 Ameren's filed comments addressing the Section 30
25 Chapter 3 Minimum Filing Requirements for Utility

1 Company General Rate Increase Requests. OPC believes
2 that Staff's proposed revisions enable electronic filing
3 contrary to Ameren Missouri's concerns that the revised
4 rule doesn't enable Ameren Missouri to provide
5 electronic filing as well. So we think that Staff's
6 revisions are fine on that regard.

7 As to Ameren's suggestion that only one copy
8 be sent to Public Counsel, we think that is a fair and
9 reasonable change.

10 JUDGE CLARK: You're talking about the
11 language as filed or are you talking about the new
12 language offered today?

13 MR. HALL: As to the -- sorry. Pardon me.

14 JUDGE CLARK: I think if I remember right,
15 Staff proposed an alternative reading today and
16 Commissioner Hall also proposed, you know, why not say
17 this or that.

18 MR. HALL: Sure. Let me respond to each in
19 kind. From Staff's original filing, we saw that as
20 breaking down two parts. One was changes to how you
21 file with the Commission. The second one was a
22 requirement of sending two copies to Public Counsel. As
23 to the first part, filing with the Commission, we
24 believe that Staff's revised rules would enable
25 electronic filing which we understand that to be Ameren

1 Missouri's desire. As to Public Counsel's -- as to the
2 change to the provision relating to Public Counsel, we
3 agree with that and think it's reasonable. As to the
4 language now offered by Staff in the alternative, we
5 think that is also reasonable. As to the language
6 offered by the Commissioner, we think that also
7 addresses the concerns.

8 JUDGE CLARK: Okay. Thank you.

9 MR. HALL: Moving on to Ameren Missouri's
10 suggestions to changes to Section 15 of Chapter 13 in
11 the Definitions section. Ameren Missouri has suggested
12 that the definition of applicant be further refined to
13 require that they provide certain information as is
14 required within the utility's tariffs. We echo Staff's
15 response that that requirement is already satisfied
16 within the newly numbered subsection (3) of Section 10
17 of Chapter 13 within Staff's proposed rules. And
18 furthermore we would not recommend the change as offered
19 by Ameren Missouri simply for the reason that not all
20 utilities require certain information at the initiation
21 of utility service.

22 As for within this same rule, Ameren Missouri
23 has suggested that the word "and" be changed to "or" so
24 that a customer would be defined as a person or legal
25 entity who is presently or who has received service from

1 the utility or accepted responsibility for payment of
2 that service.

3 I don't think this was Ameren Missouri's
4 intent. But when I read that literally, it means that
5 if you enjoy utility service you are seen as a customer
6 for purposes of that rule. We are all enjoying Ameren
7 Missouri's utility service in this room right now. If
8 the state were to nix on its bill and not pay for the
9 bill to this building, it seems we would all be defined
10 as customers and even yourself, Your Honor, could be
11 seen as someone who has to pay up the front for that
12 bill. We don't think that was Ameren Missouri's intent,
13 but literally it seems like that's the absurd result.
14 So instead we recommend that you keep the changes as
15 offered by Staff.

16 I should have mentioned that. As I'm going
17 through Ameren Missouri's comments, if I fail to respond
18 to any of the recommendations, it's merely because
19 Public Counsel concurs or agrees with their position.

20 JUDGE CLARK: I can see how you're reading the
21 first section that way. When it says previously
22 received service from the utility, is that what you're
23 referring to?

24 MR. HALL: No. What I mean is if you change
25 the -- if you change the and to or within sub --

1 JUDGE CLARK: Substantial benefit? Point me
2 to exactly what you're looking at. That's what I want
3 to know.

4 MR. HALL: Okay. Section 15, Chapter 13
5 Definitions you go to, I believe these are called
6 paragraphs, paragraph (G). You have a definition of
7 customer. Someone who is presently or has previously
8 received service from the utility and accepted
9 responsibility. The and is what was offered by Staff.
10 Ameren Missouri has offered in the alternative that that
11 and be changed into an or in order to provide clarity to
12 the rule.

13 Public Counsel offers that read literally then
14 a customer is someone who accepted responsibility or
15 someone who ever presently or in the past received
16 service, and customers within this chapter would then be
17 subject to bill collection methods by the utility.

18 Public Counsel offers that to better address
19 Ameren Missouri's concerns the definition of customer
20 could be changed to something of the nature of someone
21 who is responsible for paying those bills. That would
22 take care of people who have explicitly accepted
23 responsibility such as those customers who call the
24 utility and put their name on those accounts. That
25 would also address the common law responsibilities of a

1 joint tenant or a roommate who enjoys that service and
2 has a much more substantial connection to the utility
3 and responsibility of payment rather than just any
4 passerby who happens to enter a building and by the
5 nature of being in the building literally enjoys that
6 utility service.

7 JUDGE CLARK: You're taking mainly received is
8 the word that's really causing a problem there for you?

9 MR. HALL: Yes.

10 COMMISSIONER HALL: Okay. So what is OPC's
11 position on the original language, the existing
12 language?

13 MR. HALL: Public Counsel does not see any
14 need to change the language. We believe that Staff's
15 revisions are a fair and reasonable change to them.

16 COMMISSIONER HALL: So it would appear that
17 Ameren, Staff and OPC are all fine with leaving the
18 existing language?

19 MR. HALL: Yes.

20 COMMISSIONER HALL: Okay. Thank you.

21 MR. HALL: Or rather do not let me speak for
22 other parties. If they disagree, they should voice
23 that.

24 Moving on to Ameren Missouri's suggested
25 changes to Section 30 of Chapter 13 Deposits and

1 Guarantees of Payment. Ameren Missouri is concerned
2 about the implication that the customers who have been
3 assessed a deposit at anytime could pay in installments
4 even if they were not able to pay the deposit in full
5 during November, December, and January. Honestly, I
6 guess we're okay with that implication in terms of
7 consumer benefits. We don't actually see Ameren's
8 proposed revisions as addressing that vagueness on the
9 part of the company.

10 However, we do agree that citing to the Cold
11 Weather rule to avoid any conflict between the Cold
12 Weather rule and the guaranteed payments is a fair and
13 reasonable change. So we approve of Ameren Missouri's
14 suggestion that the phrase unless prohibited by 4 CSR
15 240-13.055(8) is a fair change.

16 At the same time, I also believe that Staff
17 Counsel's witness's suggestion that this be changed to
18 just reference to Chapter 13 would also be good.

19 JUDGE CLARK: Thank you.

20 MR. HALL: Finally, as to any other changes
21 that I did not address in Ameren Missouri's filing, we
22 either concur with them or agree and think that they are
23 reasonable changes that should be approved.

24 JUDGE CLARK: Thank you. Ameren Missouri?

25 MS. JOHNSON: Thank you. Paula Johnson for

1 Ameren Missouri. I'm just going to kind of go through
2 and support our comments and respond to some of the
3 things that have been said. Before I do, though, I do
4 want to thank Staff for all the hard work they have gone
5 through to work on pulling these rules together and
6 consolidating them. I appreciate what an effort that is
7 and I just want to let you know that we do appreciate
8 everything you've done and we hope that our additional
9 comments just provide further benefit.

10 Going to the definition in my paragraph 6, I
11 think we were just going for a little bit of
12 transparency. We don't really have a concern about the
13 independence. We just think transparency in government
14 is always a good thing. In our eyes, that made that
15 clear. I don't think we would contest anything. We
16 know that Staff has been wonderful to work with. Having
17 that standard in place doesn't necessarily hurt anything
18 either and just kind of reinforces, reinforces the
19 operations and transparency to the public.

20 Paragraph 7 when we're getting into the
21 complaints, I think one of the reasons we suggested the
22 email service, we do have a general service email where
23 we can receive some of these so we know it will always
24 get to our in house counsel. I realize that not every
25 utility has that opportunity. I think maybe an

1 either/or service might be helpful partially because the
2 sooner we can get service of a complaint the sooner we
3 can begin working to try to address it and see if we can
4 resolve it before it ever gets into another proceeding.
5 Going through the mail system, sometimes it can add an
6 extra five days or so to that process just for us being
7 able to address the customer's concern that much more
8 quickly. So if there's a way that we could construct
9 language that might do an either/or for companies like
10 ours that does have a general service email that goes
11 directly to our attorneys, that would be very helpful.

12 JUDGE CLARK: Just a quick question. So what
13 you're saying right now is right now you don't receive
14 an EFIS notification or an email? For a complaint for
15 Ameren to have notice of it at this time it's entirely
16 via email -- or entirely via the postal service?

17 MS. JOHNSON: We don't always receive an EFIS
18 notification. Usually we don't get the full content of
19 anything until we get the mailed service. So I can
20 double check with our paralegals to make sure I'm
21 reflecting that correctly. I do know that even when we
22 do like spot some of these we still have to file an
23 entry of appearance so that we can get the full
24 information and that would just speed up that process
25 for us also.

1 JUDGE CLARK: Thank you.

2 COMMISSIONER HALL: I'd be interested if Staff
3 or OPC could respond to that argument if they have any
4 additional analysis that would be valuable.

5 MS. MYERS: I can speak from Staff's
6 perspective. So what we were going for here was just a
7 clarification of what constitutes service here. And so
8 tying it to the Supreme Court Rule 54 we thought was
9 something that would provide consistency.

10 To Ms. Johnson's point, and as I kind of
11 briefly noted earlier, we understand that there are
12 utilities who may have in house counsel or a general
13 service list. I think if we could craft this language
14 in a way that would allow for those utilities to be
15 served that way with the default is through the Supreme
16 Court Rule 54 so that we are getting proper service on
17 these other utilities. I think my initial concern on
18 reading Ameren Missouri's proposed language is that
19 public utilities, any service email on record and
20 whether that's on record in any particular case it's not
21 listed here, you know. It could have been an attorney
22 that represented someone in several cases prior is no
23 longer representing them. Those kinds of things were
24 concerns when thinking about all utilities.

25 JUDGE CLARK: That's exactly what I'm thinking

1 about when -- thinking about the fact that most of the
2 complaints have confidential information.

3 MS. MYERS: Right.

4 JUDGE CLARK: And so when those go out
5 certified mail, and they're theoretically getting to who
6 they should get to, theoretically they shouldn't be
7 going to anybody else before an entry of appearance is
8 made.

9 MS. MYERS: Exactly.

10 MR. HALL: Your Honor, if I may add. Perhaps
11 this would be a belt on top of suspenders, but maybe
12 both parties' concerns could be addressed by requiring
13 the mailed service in compliance with Supreme Court Rule
14 54 with the additional option that if a general service
15 email address is provided by a larger utility that the
16 Commission can forward that complaint immediately --
17 thereupon to that email in addition to mail service.

18 MS. JOHNSON: We would be very appreciative of
19 that as a process.

20 JUDGE CLARK: How does that alleviate the down
21 side of it possibly not ending up with litigation,
22 ending up somewhere it shouldn't be?

23 MS. MYERS: To your point, Judge, I'm not sure
24 that it does before that entry of appearance.

25 MS. JOHNSON: I do realize that not every

1 utility is set up this way, but our general service
2 email only goes -- the only people who have access to
3 that are the Missouri regulatory attorneys and our
4 paralegals. There aren't any other parties who can
5 actually access that inbox, but we do check that inbox
6 regularly throughout the day. So if there was some
7 construct where we could receive service that way, that
8 would allow us to more quickly get an entry of
9 appearance, get the additional information and begin
10 working all that more quickly on trying to get the issue
11 resolved.

12 MS. MYERS: One thought I had on Ms. Johnson's
13 point of just getting notice as soon as possible that
14 something has been filed, I believe there are ways to
15 set up EFIS notifications so that if anything is filed
16 with Union Electric Company d/b/a Ameren Missouri a
17 notification is sent out. So I think, Ms. Johnson, when
18 you check with your paralegals, that might be something
19 to check with too to make sure you guys are getting that
20 notice right away. Again, it might not be the
21 confidential information, but they'll be on note that
22 something has been filed.

23 JUDGE CLARK: I think that would address at
24 least some of what I'm immediately concerned with
25 because, like I said, I understand that that's how

1 Ameren is set up but I have no way of knowing that
2 that's how other utilities are set up.

3 MS. MYERS: Right. And again, that wouldn't
4 be anything that would need to be done through a rule
5 change. That's just an option for EFIS notifications.

6 MS. JOHNSON: Thank you. I will check into
7 those EFIS settings since I wasn't aware that might be a
8 possibility and that would help us tremendously. So
9 thank you for that.

10 Let's see. As far as the other portion
11 (15)(D), I think I may not have made our position
12 entirely clear. We absolutely do prefer to be able to
13 get Staff recommendations. Maybe there's another way to
14 clarify the language. Our issue would only come into
15 play if for some reason Staff went, and this is not
16 something I've seen happen often, but if Staff for some
17 reason decided to lead the charge on behalf of the
18 customer and began taking an advocacy position that just
19 went a little too far into that realm and kind of lost
20 the semblance of neutrality in their position. Again,
21 this is not something that has happened very often, and
22 we have had very good working relationships with Staff
23 in getting this resolved. But while -- but it sounds
24 like there's another language, maybe some other language
25 we could find where we could meet in the middle, because

1 we don't want Staff to also feel that they can't make a
2 recommendation, because obviously that provides value to
3 everyone.

4 We also don't want Staff to feel that they
5 have to get into the advocacy position because that's
6 for the customer and possibly the Office of the Public
7 Counsel to do. So I guess that was our main concern.

8 COMMISSIONER HALL: Does this concern go
9 beyond situations where there are small complaint cases,
10 because that's all we're dealing with here. And so my
11 understanding of this provision is to give Staff the
12 same authority and responsibility it has in all cases.

13 MS. JOHNSON: I think that this would be
14 limited to the small rate cases because we understand --
15 or small complaint cases, because we understand like in
16 a rate case they have a position that they have to
17 advocate on but they are by nature looking at an
18 expansive position that covers everything from here to
19 here. So we don't see that as an issue in the other
20 cases. Their position is kind of that inherent
21 neutrality because they're charged with balancing all
22 the interests at once.

23 I think there could be a temptation in the
24 small complaint case when there's one customer who has a
25 certain issue that Staff feels strongly about. There

1 might be a temptation to go a little further than just
2 this is our recommendation and how that could be seen,
3 and I don't want them to feel they have an obligation to
4 be that customer's attorney because that's not their
5 responsibility. So I think the concern is far more with
6 the small complaint cases than it is with the broader
7 cases just because the broader cases also have a wider
8 variety of intervenors who are coming into the process,
9 which I think also kind of addresses the broader
10 standing and the broader spectrum of positions.

11 We don't have that necessarily in the small
12 complaint cases. We don't want Staff to feel like they
13 have to get involved to a larger extent beyond just the
14 investigation and the recommendation.

15 COMMISSIONER HALL: So you would take issue
16 also with the new rule regarding Staff assisted rate
17 cases?

18 MS. JOHNSON: I have not looked at that in
19 detail. I've just looked at it from this perspective.
20 So I can't speak to that particular proposed rule.

21 COMMISSIONER HALL: Okay.

22 JUDGE CLARK: My understanding of Staff's
23 position right now is they're almost not understanding
24 why they're in these complaints if their sole purpose is
25 to provide a report that's sort of a broad recitation of

1 just merely the facts, whereas in most cases they
2 provide a recommendation based on what they believe
3 should happen according to the rules, the law and the
4 tariffs. I think given the nature of what a complaint
5 case is, which is let's take the small, for example,
6 individual customer complaint, at the end of the day I
7 mean, are you really advocating a position if what -- if
8 what the customer has to show is that a Commission rule,
9 order, tariff or law that would be under the authority
10 of the Commission was violated, how does that put Staff
11 in a position where they're advocating if those are the
12 outside limits of their authority?

13 MS. JOHNSON: I think, and it's fairly
14 subjective which is why this is a hard one to discuss, I
15 mean, I think it's absolutely appropriate for Staff to
16 investigate, report on the facts that they believe are
17 appropriate and to make a recommendation regarding
18 whether or not they feel a rule or a tariff has been
19 violated. I think that is entirely appropriate.

20 Our issue comes in when it goes beyond -- when
21 almost like when there's more -- there feels like more
22 of an emotional tie in what they're doing as if they are
23 now personally invested in the outcome on behalf of this
24 customer. Again, this is something I've very rarely
25 seen. I can't even cite to the example I'm thinking of

1 off the top of my head. I can't remember what exact
2 complaint case it was, but we have seen where like the
3 language in what was filed before the Commission was
4 very -- there was no neutrality to it. There was very
5 little neutrality to it. There was very little of these
6 were the facts, this is what happened, this is our
7 recommendation. It was more along the lines of the
8 company did this and it was reprehensible and how could
9 they, and that's what we're trying to avoid.

10 And that was hyperbole admittedly, but that's
11 the point we're trying to avoid, because I mean, Staff
12 in small complaint cases in particular, I mean, they
13 have the ability to go back and go through a lot of the
14 technical details and everything that are involved in
15 this. They absolutely have a very good standing to kind
16 of set a level set this is what we believe has happened
17 in this complaint and this is what we recommend you
18 should do. Again, we have no issue with that. It's
19 when -- and again, this is extremely rare, but it's when
20 it's gone beyond that into more of an emotional stance
21 almost. I can't think off the top of my head of a
22 better way to describe it, that kind of issue.

23 JUDGE CLARK: Let me ask you this. What
24 you're taking issue is the removal of the language Staff
25 shall not advocate a position beyond reporting the

1 results of its investigation. It sounds like what
2 you're saying is you do not believe that that language
3 prohibits Staff from making a recommendation?

4 MS. JOHNSON: Right. And perhaps a good way
5 to do it is even, you know, it does not prohibit beyond
6 reporting the results of the investigation in making a
7 recommendation regarding those results to the
8 Commission. I mean, maybe adding that language in would
9 be helpful also. That would not create an issue and I
10 think would draw very appropriate lines.

11 JUDGE CLARK: Thank you.

12 MS. JOHNSON: Thank you. I appreciate that.
13 I know that was a difficult one, and I appreciate you
14 hearing me out on that.

15 As far as the filing requirements when we get
16 to our paragraph 9, I will state that the way the rule
17 has been revised to read still states an original and
18 one copy, which very strongly implies that that is a
19 hard copy. But if we can find some compromise language
20 that would -- if we can find some way to say that, you
21 know, we -- I'm trying to think of how to state this.
22 If it didn't say an original and one copy, if it just
23 said something like shall file a copy or something like
24 that, I think it would be easier to infer that
25 electronic filing was also allowed. So we just want to

1 make sure that when we do our big cases that we aren't
2 needing to bring down 14 copies. I would hate to bring
3 down 14 copies of a MEEIA filing or something and put on
4 someone's desk given that they're like a thousand pages
5 long. I also don't want to file EFIS and just assume
6 we're not violating a rule. I think even taking out the
7 original and one copy and putting some other language in
8 there, shall file with or shall file one copy with or
9 something like that, that would take out some of that
10 inference that a hard copy is involved.

11 JUDGE CLARK: I think that's actually what
12 Staff proposed today. Am I correct in that?

13 MS. MYERS: Yes, that was our intent.

14 MS. JOHNSON: Okay. That would be great so
15 thank you. Let's see. When we get to paragraph 12, I
16 did want to clarify one thing. I know Staff referenced
17 that 13.010(4) probably addressed what our concern was.
18 I'm not sure if I'm reading that incorrectly. But when
19 I turn to the existing regulation, it seems to be
20 discussing that the utility will adopt rules governing
21 relationships with customers and applicants. So I'm not
22 entirely sure that does fully address what our concern
23 was. And we were -- We're fine if we go back to the
24 original language. I think the word residential in
25 there kind of means that a nonresidential customer could

1 never be an applicant. So we do wonder if that word
2 needs to come out of the regulation.

3 MS. MYERS: Judge, if you don't mind if I just
4 talk to our customer experience department about Ameren
5 Missouri's most recent comment on that.

6 JUDGE CLARK: Go right ahead.

7 MS. MYERS: Thank you. Staff would be okay
8 with removing the word residential.

9 JUDGE CLARK: Thank you.

10 MS. JOHNSON: Thank you. I also wanted to
11 address a little bit more of the and/or issue. I
12 understand OPC's concern about changing that from and to
13 or. I think that's kind of alone a further out
14 representation of the rule but I also think switching to
15 and, and I don't know if there's some way we can find a
16 middle ground on this language because just referring to
17 and there could also be a very strict reading that well,
18 since say there are two roommates, one roommate never
19 put his name on the bill, then he could say well, I
20 never accepted responsibility for it and then we lose
21 some of the benefits of service rules that let us go
22 towards other collections.

23 I don't know if there's a middle ground on
24 that, but I don't think changing it to and is the answer
25 because that just lessens our ability to try to find

1 other ways to avoid incurring bad debt in the first
2 place, because that just has to get socialized to all
3 customers. So maybe there's a middle ground we can find
4 somehow. Maybe who has previously received service or
5 the benefit of service. I know that may not fully
6 address OPC's concern, but that has some additional
7 connotations beyond just receiving service without
8 getting into the and accepted. So that is our concern.
9 We think and accepted goes too far and we understand OPC
10 thinks or accepted doesn't go far enough. I'm not sure
11 how to find a middle ground there.

12 JUDGE CLARK: I understand both concerns from
13 a strict reading of it each way.

14 MS. JOHNSON: Yes.

15 MS. MYERS: Judge, if I may. I think as Staff
16 had noted, we were okay with just leaving the existing
17 language, and I think Ameren Missouri and OPC may have
18 made that comment as well. If we're trying to find a
19 middle ground, we did have another language option
20 there. Instead of and accepted, we would suggest and is
21 responsible for payment of service might also be other
22 language if the Commission would choose to do something
23 different than the existing language.

24 MS. JOHNSON: And I believe we would find that
25 acceptable and is responsible for.

1 COMMISSIONER HALL: I'm getting confused. If
2 we take the existing language and remove residential,
3 who is opposed? Staff is fine with that. That was your
4 request, right, Ms. Johnson?

5 MS. JOHNSON: That's correct, yes.

6 COMMISSIONER HALL: So Ameren would be fine
7 with that. OPC, are you fine with that as well?
8 Mr. Hall?

9 MR. HALL: We see no -- Public Counsel sees no
10 reason to object at this time.

11 COMMISSIONER HALL: Okay. Thank you.

12 JUDGE CLARK: That's just shortening the
13 entire thing to applied to receive service. Okay.
14 Thank you. Go on.

15 MS. JOHNSON: And I apologize if I
16 inadvertently caused some confusion there. As far as
17 that addressed (1)(A) and as far as (1)(G), if we went
18 back to the original language we would be good with it
19 there also. Otherwise, we also like the suggestion that
20 Ms. Myers just made regarding is responsible for
21 service. I think either of those would work for us.

22 Moving on to paragraph 13. I think we would
23 advocate to maintaining the tie. This rule specifically
24 references an alternative that can be done during the
25 months of November, December, and January. It seems

1 pretty explicitly tied to the Cold Weather rule. So we
2 would prefer to see that tie -- that strong tie to the
3 Cold Weather rule remain rather than opening it up to
4 this chapter. For one thing, we're in -- I haven't had
5 a chance to go through the entire chapter to see if
6 there's something that might undermine the entirety of
7 that rule in the first place. So I think limiting it to
8 the Cold Weather rule gets to the intent of what was
9 there without potentially opening it up so broadly that
10 this particular provision has no meaning.

11 Again, I'm saying that without having a chance
12 to go back and go all the way through Chapter 13, but I
13 think by its language it's fairly clearly tied to the
14 Cold Weather rule and we'd like to see it continue to be
15 tied to the Cold Weather rule. I believe that concludes
16 my comments and I thank you for the opportunity. If
17 there are any other questions, I'm absolutely happy to
18 answer them.

19 JUDGE CLARK: Any questions from the
20 Commission?

21 COMMISSIONER HALL: I'd like Staff and OPC to
22 respond to that last statement by Ms. Johnson. I think
23 that is a legitimate concern that opening it up to the
24 entire chapter as opposed to the specific provision.

25 MS. MYERS: Yeah, that is a valid point. So

1 as a compromise I think limiting it to 13.055 instead of
2 narrowing it down to (8), because 13.055 is the Cold
3 Weather rule. I think the concern we were trying to
4 address by saying this chapter, and I do think probably
5 only the Cold Weather rule is applicable but I do see
6 how that could open that up to interpretations that we
7 aren't intending. So I think limiting it to 13.055 and
8 just eliminating that section (8) specific cite would
9 satisfy Staff.

10 MS. JOHNSON: We'd be amenable to that. Thank
11 you.

12 MR. HALL: I will also plead ignorance as to
13 the knowledge of any other provisions within Chapter 13
14 that may conflict with this particular rule. If another
15 section does exist, though, we believe that there would
16 still be a conflict regardless of this unless prohibited
17 language, whether the unless prohibited language applies
18 to just one section. If we make it clear that it
19 applies to this chapter, we believe that that should --
20 we believe that's actually better for the company. If
21 however we think that the end result of what all parties
22 are wanting to get to is also accomplished by just
23 citing to the Cold Weather rule and with what Staff just
24 suggested removing subdivision (8) from the particular
25 -- with regard to the particular citation of Section 55

1 in Chapter 13 is also reasonable.

2 COMMISSIONER HALL: I have no further
3 questions.

4 JUDGE CLARK: Thank you. Anything further
5 from Ameren?

6 MS. JOHNSON: Nothing further. Thank you.

7 JUDGE CLARK: KCP&L, GMO?

8 MR. FISCHER: Judge, Commissioner, KCP&L, GMO
9 didn't file separate written comments. I think they
10 generally concur with the comments that were filed by
11 Ameren however. The only issue that was specifically
12 brought to my attention was the one related to the
13 revision that Ameren talks about on (1)(G) of the
14 Definitions section, and I understand from the comments
15 in the room that Staff and Public Counsel and Ameren are
16 okay with leaving the rule as it exists today, and my
17 client would agree with that too.

18 JUDGE CLARK: Point me to that again, please.

19 MR. FISCHER: It begins at the bottom of
20 (1)(G) -- excuse me, bottom of page 6 where they're
21 talking about (1)(G) and it carries over to the top
22 third of the next page and that's talking about the
23 benefit of service issue that's been discussed. KCP&L
24 and GMO would like to retain the existing language I
25 think rather than changing that to possibly implicating

1 how the existing customer service practices are.

2 JUDGE CLARK: Okay. Thank you.

3 MR. HALL: For clarity, Jim, you're referring
4 to Section 15, Chapter 13, correct, when you say (1)(G)?

5 MR. FISCHER: Yes, yes. It's discussed in
6 Ameren's comments at paragraph 12 at the bottom of that
7 page.

8 MR. HALL: Thank you.

9 MR. FISCHER: With that, that's all I have.

10 JUDGE CLARK: Okay. Have I missed anybody?
11 Are there any other comments? Hearing none, appears
12 we're done with the comments and responses. Are there
13 any other issues or matters that need to be addressed by
14 the Commission at this time? Staff?

15 MS. MYERS: No, Judge.

16 JUDGE CLARK: OPC?

17 MR. HALL: None, Your Honor.

18 JUDGE CLARK: Ameren Missouri?

19 MS. JOHNSON: None, Your Honor.

20 JUDGE CLARK: KCP&L and GMO?

21 MR. FISCHER: No, sir.

22 JUDGE CLARK: Hearing none, this hearing is
23 adjourned and we'll go off the record. Thank you all
24 for your time today. I appreciate it.

25 (Off the record.)

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CERTIFICATE OF REPORTER

I, Beverly Jean Bentch, RPR, CCR No. 640, Certified Court Reporter with the firm of Tiger Court Reporting, LLC, within the State of Missouri, do hereby certify that I was personally present at the proceedings had in the above-entitled cause at the time and place set forth in the caption sheet thereof; that I then and there took down in Stenotype the proceedings had; and that the foregoing is a full, true and correct transcript of such Stenotype notes so made at such time and place.

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<p>(</p> <hr/> <p>(1)(A) 14:1,6 39:17</p> <p>(1)(G) 14:15 39:17</p> <p>(15)(D) 9:16 18:20,21 30:11</p> <p>(3) 11:25 12:9 20:16</p> <p>(4) 14:8,13</p> <p>(8) 8:12 18:20</p> <p>(G) 22:6</p> <hr/> <p style="text-align: center;">0</p> <hr/> <p>015 13:25</p> <hr/> <p style="text-align: center;">1</p> <hr/> <p>10 4:10 16:21 20:16</p> <p>10.020 4:13</p> <p>10.040 4:13</p> <p>10:00 4:3,4</p> <p>12 13:23 36:15</p> <p>13 4:10 13:25 15:3 20:10,17 22:4 23:25 24:18 39:22 40:12</p> <p>13.010 4:13 14:8,13</p> <p>13.010(4) 36:17</p> <p>13.015 4:13 14:16</p> <p>13.020 4:13</p> <p>13.025 4:13</p> <p>13.030 4:13 15:3</p> <p>13.050 4:14</p> <p>13.055 4:14</p> <p>13.070 4:14</p> <p>14 9:9,10 12:1 15:14 36:2,3</p> <p>15 20:10 22:4</p>	<p>17-03 6:6</p> <p>18 5:3</p> <p>18th 16:6</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p>2 4:10 6:17,18 7:15 16:21 17:25</p> <p>2.010 4:12 7:17</p> <p>2.070 4:12 8:11 9:16</p> <p>2.120 4:12</p> <p>2019 4:4</p> <p>240's 4:10</p> <p>240-13.055(8) 24:15</p> <p>240-2.205 4:15</p> <p>29 4:4</p> <hr/> <p style="text-align: center;">3</p> <hr/> <p>3 4:10 6:17,19,24 7:3 11:16 18:25</p> <p>3.010 4:12 6:20</p> <p>3.015 4:11</p> <p>3.020 4:11</p> <p>3.025 4:11</p> <p>3.030 4:12 11:18</p> <p>3.180 4:11</p> <p>3.250 4:12</p> <p>30 18:24 23:25</p> <p>310 4:5</p> <p>386.020 6:22 7:1</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p>4 4:10,14 24:14</p> <hr/> <p style="text-align: center;">5</p> <hr/> <p>54 8:14,17 9:4,7,9</p>	<p>27:8,16 28:14</p> <hr/> <p style="text-align: center;">6</p> <hr/> <p>6 7:16 13:24 25:10</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p>7 8:9,10 25:20</p> <p>70 17:25</p> <hr/> <p style="text-align: center;">8</p> <hr/> <p>8 11:15,17 15:7</p> <hr/> <p style="text-align: center;">9</p> <hr/> <p>9 11:17,18 18:23 35:16</p> <hr/> <p style="text-align: center;">A</p> <hr/> <p>a.m. 4:3,4</p> <p>ability 34:13 37:25</p> <p>absolutely 30:12 33:15 34:15 40:17</p> <p>absurd 21:13</p> <p>acceptable 38:25</p> <p>accepted 21:1 22:8, 14,22 37:20 38:8,9,10, 20</p> <p>access 29:2,5</p> <p>accounts 22:24</p> <p>acknowledge 8:18</p> <p>add 14:6 26:5 28:10</p> <p>adding 35:8</p> <p>addition 28:17</p> <p>additional 6:12 7:19 10:11 14:10,20 15:6, 12 25:8 27:4 28:14 29:9 38:6</p> <p>address 22:18,25</p>	<p>24:21 26:3,7 28:15 29:23 36:22 37:11 38:6</p> <p>addressed 16:7,25 28:12 36:17 39:17</p> <p>addresses 20:7 32:9</p> <p>addressing 18:24 24:8</p> <p>admittedly 34:10</p> <p>adopt 36:20</p> <p>advocacy 30:18 31:5</p> <p>advocate 31:17 34:25 39:23</p> <p>advocating 33:7,11</p> <p>agree 10:18,25 14:17 20:3 24:10,22</p> <p>agrees 15:5 21:19</p> <p>ahead 14:14 16:19 37:6</p> <p>alleviate 28:20</p> <p>allowed 35:25</p> <p>allowing 9:18,22</p> <p>alternative 17:20 19:15 20:4 22:10 39:24</p> <p>amend 16:14</p> <p>amendments 4:9,12</p> <p>Ameren 5:9,11 7:7,9, 10,13,15,19,25 8:10, 12,14 11:21 13:5,23, 24 14:1,6,9,15 15:3,7, 13,14 17:13,19,24 18:1 19:3,4,25 20:9, 11,19,22 21:3,6,12,17 22:10,19 23:17,24 24:1,13,21,24 25:1 26:15 27:18 29:16 30:1 37:4 38:17 39:6</p> <p>Ameren's 8:9 9:15,24 13:6,17 14:22 15:6 16:17,18,20,24 18:24 19:7 24:7</p>
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