

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company d/b/a) **File No. EO-2017-0176**
Ameren Missouri's Cost Allocation Manual (CAM))

STAFF'S SECOND STATUS REPORT

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), through Staff Counsel’s Office, and for its Second Status Report submits the following. Counsel for both Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) and the Office of the Public Counsel (“Public Counsel”) have authorized undersigned counsel to state that said additional parties concur in this status report. In support thereof, the Staff states as follows:

1. On June 30, 2017, the parties to File No. EO-2017-0176, Ameren Missouri, Public Counsel, and Staff filed a Joint Motion to Suspend Procedural Schedule because the parties believed they were making good progress and the best path forward was to allow the parties to continue to work together without the constraints of imminent deadlines and milestones of the then current procedural schedule. The parties requested that the Commission issue an Order suspending the current procedural schedule through October 31, 2017, and require Staff (either individually or jointly with Ameren Missouri and/or Public Counsel) to file a status report on or before October 31, 2017.

2. On October 31, 2017, the Staff filed its first Status Report advising the Commission of the progress of discussions toward an agreed-upon CAM, including an indication that Ameren Missouri would be providing sometime in December 2017,

comprehensive comments on Staff's draft CAM, which consisted of 16 separate "tabs" and various appendices.

3. By order dated November 1, 2017, the Commission ordered Staff to file a further status report by March 1, 2018.

4. On December 15, 2017, Ameren Missouri provided its comments on Staff's draft CAM. Due to the press of other Commission business, the parties thereafter were not able to schedule a meeting to discuss Staff's draft CAM and Ameren Missouri's comments for as soon as they had hoped for. The Staff and Ameren Missouri next met on February 14, 2018, and met again the following week on February 20, 2018.

5. As indicated in its first Status Report, Staff would not characterize any issue that has arisen as unresolvable, nor have the parties reached a point yet where a revised procedural schedule will be needed to resolve issues. The parties continue to resolve a number of issues and are continuing to work toward resolution of issues that remain. It remains Staff's opinion that the best course of action is for the parties to continue to work at producing an agreed upon CAM.

6. Staff recommends that the Commission issue an Order directing Staff to file another status report to the Commission by May 31, 2018, respecting the progress being made by the parties in this docket and whether a revised procedural schedule will be needed to resolve issues.

7. Proceeding in the manner suggested herein does not prejudice any party's right to (a) make a filing prior to May 31, 2018, if a party believes that sufficient progress is not being made, and a revised procedural schedule should be put in place to resolve

this docket or (b) file a response to Staff's May 31, 2018, status report within 10 days thereof.

8. The parties commented in their June 30, 2017, Joint Motion to Suspend Procedural Schedule that the development of a CAM is a significant undertaking for the parties. That remains true. The Staff would note that there are presently two additional CAM cases¹ pending before the Commission involving the drafting of what are intended to be Commission approved CAMs, there is an open Staff investigation regarding the gas supply documentation requirements of the Spire CAM and Standards of Conduct,² and the Commission in its recent Report and Order in the Spire rate cases stated that it would establish by separate order a working group respecting the Spire CAM.³ Each CAM case is very different because, for among other reasons, the utilities involved are parts of very different corporate structures.

WHEREFORE the Staff submits its Second Status Report and requests that the Commission issue an Order directing the Staff to file another status report to the Commission by May 31, 2018, respecting the progress being made by the parties in this docket, whether a revised procedural schedule will be needed to resolve issues, and other matters as further suggested hereinabove.

¹ File No. GO-2012-0322: In the Matter of the Application of Summit Natural Gas of Missouri, Inc. for Approval of its Cost Allocation Manual.

File No. AO-2017-0360: In the Matter of the Application of The Empire District Electric Company, The Empire District Gas Company, Liberty Utilities (Midstates Natural Gas) Corp., and Liberty Utilities (Missouri Water) LLC for Approval of Their Cost Allocation Manual.

² File No. GO-2017-0223.

³ File Nos. GR-2017-0215 and GR-2015-0216, pp. 58-59 (February 21, 2018).

Respectfully submitted,

/s/ Steven Dottheim

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all counsel of record this 1st day of March, 2018.

/s/ Steven Dottheim