

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

In the Matter of a Working Case to Explore)
Emerging Issues in Utility Regulation.) File No. EW-2017-0245

AMEREN MISSOURI'S COMMENTS

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and submits these comments on the fourth draft rule (proposed 20 CSR 4240-22.055) circulated by the Staff on January 15, 2020, and also provides its cost estimates for complying with the proposed rule, as follows:

1. Ameren Missouri appreciates the Staff’s efforts at incorporating feedback received in comments that were filed by stakeholders on November 1, 2019, in response to the third draft prepared by Staff. The Company has a few comments on the Staff’s fourth draft, as follows:

- Subsection (2)(A)1 – The new language “as further summarized by areas of low, medium, and high penetration” should be struck. As the Utilities indicated in their November 1, 2019 comments, it is unclear how one would determine what “low, medium, and high” is and even if it were clear there is no need for the utility to categorize the penetration; users of the information will be able to readily see what distributed generation and storage is on the system, and where.
- Subsection (4)(B)6 – The word “programs” should be stricken after “energy efficiency” because it is duplicative.
- Subsection (4)(C) - The language “using the total resources cost test, and any additional tests the utility deems relevant,” suggested in the Utilities’

November 1, 2019 comments should be added to be consistent with how this is handled in the MEEIA rules.

2. With respect to the cost of compliance with the proposed rule, should it ultimately be adopted, the costs associated with the proposed rule are generally not duplicative of the costs estimated by the Company in a filing made in File No. EW-2018-0078, which dealt with drafts of proposed rules 20 CSR 4240-20.060 and 20 CSR 4240-20.065. If this rule were adopted the Company would likely incur very similar costs to those estimated in File No. EW-2018-0078. Specifically, the Company estimates the following costs:

- Initial Cost: \$112k-\$450K (Administrative \$37K-\$75K, System Purchase/Enhancement \$75K-\$375K)
- Annual Cost: \$7K-\$15K (Database administration)

3. It should be noted that the costs are primarily related to the cost to purchase and configure a new tracking software system or modify an existing software system as well as perform ongoing database maintenance necessary to ensure the integrity of the data over time. Because the users (billing, distribution engineering, interconnection processing, etc.) of the DER database information have greatly different needs, it is likely that the DER information will have to be shared across several systems which will require material information technology resources to build and test the pathways for sharing information between those systems.

4. In a filing made in File No. EX-2020-0006 (the formal rulemaking docket initiated for proposed rules 20 CSR 4240-20.060 and 20 CSR 4240-20.065), Staff took issue with the Company's cost estimates under the premise that little new information, beyond what the Company already collects during the interconnection process, is required under the proposed rule. That premise, however, is not correct. The Company's current data collection processes and

database simply do not support the maintenance of accurate data about the specific circuits to which DER is connected (20 CSR 4240-20.060 (11)(C)1.A., (11)(C)1.B., (11)(C)2.B., (11)(C)2.C. and 20 CSR 4240-22.055 2.A.3.). Nor do the current processes provide the engineering analysis necessary to identify circuits as being high, medium, and low penetration (20 CSR 4240-22.055 2.A.1.). While the costs presented by the Company are not refined estimates (and can't be, since the system requirements have not been set out in a specification, designed, bid or budgeted), they are Company's best estimate at this time. To reiterate: the amount of additional data to be collected is not the primary factor. Rather, it is the necessity to establish a new (or modified) DER database and provide communication between the DER database and other engineering or billing software or databases that will determine the cost of implementing the increased collection, reporting and analysis of Company's DER information, as would be required by both 20 CSR 4240-22.055 and 20 CSR 4240-20.060, as proposed. It should also be noted that there may be costs in addition to those noted above, including some additional FTE costs and possibly some incremental costs associated with the DER potential study caused by these additional requirements.

WHEREFORE, the Company appreciates the opportunity to provide these comments, including these cost estimates, and looks forward to discussing them further as the workshop process proceeds.

Respectfully submitted,

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