

2. On June 8, 2018, the Company provided Staff with a massive amount of workpapers for its Application. The Application workpapers, *excluding* DSMore files², are sized at 1.65GB with 62 files in 9 folders.

3. On June 22, 2018 the parties filed a *Joint Motion To Adopt Procedural Schedule* and on June 27th the Commission issued its Order Adopting Procedural Schedule (“Order”).

4. The Order requires parties to file rebuttal testimony by August 14, 2018. To facilitate discovery, Order paragraph 3 set out a requirement for the Company to hold weekly technical conferences every Tuesday from 9:00am to 11:00am through July 31, 2018, up to the date of the October 2-5 hearing, at the discretion of the parties. However, the Order further allowed “Any party can choose to cease participation in the technical conferences without affecting the choice of the remaining parties to continue to participate.” Ameren cancelled two technical conferences but has committed to hold one, one-hour technical conference on July 24th.

5. Ameren Missouri participated in two, two-hour technical conferences, the first on June 26th and one other on July 3rd.

6. On July 9th, Company counsel informed the parties by email that it was cancelling the July 10th technical conference.

7. On July 16th, Company counsel informed the parties by email that there would not be a technical conference on July 17th further stating “If the Company desires to have additional conferences we will let the parties know” making any future conferences at the sole discretion of the Company – the MEEIA Cycle 3 applicant.

² DSMore files, which are not included in the workpaper files, are used to calculate the benefits and cost-effectiveness of energy efficiency measures and demand-side programs.

Ameren's cancellation of these technical conferences has slowed the discovery process.

8. The technical conferences helped Staff understand many issues, many of which arose from ongoing discovery. In advance of each technical conference the Staff and, in some cases, other parties had prepared topics for discussion and forwarded its topics by email to Ameren for the Company to address at the technical conference. Because Ameren had cancelled two, two-hour technical conferences after having participated in the first two technical conferences, Staff and other interested parties were left without an opportunity to bring forward their technical issues in a forum open to all parties. Going forward there is only one, one-hour technical conference currently scheduled³ for the parties to address a growing backlog of complex technical issues.

9. In applications for a demand-side programs investment mechanism (DSIM) and for the approval of electric utility demand-side programs / portfolio, the Commission's MEEIA rules explicitly require that all workpapers with models and spreadsheets shall be provided as executable versions in native format with all links and formulas intact.⁴ This rule requirement is stated multiple times in the Commission's

³ This technical conference is set for July 24th.

⁴ **4CSR 240-20.093(2)(A)** All applications to establish a DSIM shall include the following supporting information as part of, or in addition to, its direct testimony. *Supporting workpapers shall be submitted with all models and spreadsheets provided as executable versions in native format with all links and formulas intact.* **4 CSR 240-20.094(4)(B)** As part of its application for approval of demand-side programs, the electric utility shall file or provide a reference to the commission case that contains any of the following information. *All models and spreadsheets shall be provided as executable versions in native format with all links and formulas intact:....1.A Complete documentation of all assumptions, definitions, methodologies, sampling techniques, sampling techniques, and other aspects of the current market potential study;....(C) Demonstration of cost-effectiveness for each demand-side program and for the total of all demand-side programs of the utility. At a minimum, the electric utility shall provide all workpapers, with all models and spreadsheets provided as executable versions in native format with all links and formulas intact, and include.... (D) Detailed description of each proposed demand-side program, including all workpapers with all models and spreadsheets provided as executable versions in native format with all links and formulas intact, to include at least:....3.customer incentive ranges;6. Projected gross and net*

rules and is essential to Staff's ability to understand the origin and rationale for numbers presented on an electric utility's spreadsheets. Without the requirement to provide spreadsheet cell links and formulas, an electric utility could provide only "hard-coded" numbers - meaning numbers and data that have no underlying formula support, explanation, or origin.

10. Ameren's workpapers contain many spreadsheets with cell data that have no links or formulas upon which to determine the source of that data or how a particular number or data set was derived. For example:

Workpaper File name: Wind –Solar-CC check
Tab: RESCapex-CC

STAFF CONCERN: The values assumed for Project Cost in the Base Year for each type of resource links to data sets that were not provided as part of the Application. These values are ultimately used to calculate the lost earnings opportunity that Ameren Missouri would have received absent MEEIA. Without the links allowing Staff to understand how the original numbers are calculated, Staff cannot fully evaluate the validity of the proposed earnings opportunity associated with an avoided RES compliance cost.

There are many more such examples encountered by Staff.

11. This grave omission runs throughout Ameren's workpapers and is non-compliant with the Commission's MEEIA rules. It has hindered Staff's discovery efforts by putting the burden on Staff to seek out information that the Company should have, but did not, provide as part of its Application and workpapers.. For example, the Staff has had to develop and submit detailed Data Requests to seek information on spreadsheet cell data that Staff should not have had to submit had the Company

annual and lifetime energy savings; 7. Proposed energy savings targets; 8. Projected gross and net annual demand savings; 9. Proposed demand savings targets;..... .

complied with the rules. See attached Staff Data Request No.'s 35, 57, 57.1, 60, and 60.1. Add to that the 15 day response time set out in the Order, and the end result is Staff's discovery efforts become bogged down to a point that seriously sets back Staff's ability to prepare well-informed rebuttal testimony. This discovery slow down does not end here.

12. Even when the Company responds to Staff's initial and follow-up Data Requests seeking cell links and formulas, Staff is directed to other spreadsheets containing the same hard-coded data. In other words, hard-coded data in a particular cell may appear in other data cells in different spreadsheets, but the required links or underlying formulas are not provided in the workpapers for Staff to efficiently and effectively understand the origin or rationale of the cell data – further frustrating Staff's examination.

13. In further support of its Motion, Staff points out while this case is a MEEIA Cycle 3 programs application, it is also a near \$1 billion case that will, if approved, pass nearly \$1 billion of costs onto the bills of all non-exempt customers over a 6 to 8 year period.

14. Accordingly Staff moves the Commission to suspend the procedural schedule in this case and to direct the parties to conduct weekly discovery conferences until such time as deficiencies in Ameren's workpapers are resolved. The Commission should direct Staff to file, not later than the 15th and 30th of each month (effectively every two weeks) beginning August 15, 2018 either a status report or a proposed revised procedural schedule.

15. Staff points out that the rollout of energy efficiency programs under the MEEIA statute⁵ is a voluntary undertaking by an electric utility. Once programs are approved, customer payment of MEEIA charges is mandatory. Because Ameren's proposed 6 year MEEIA Cycle 3 programs are complex and expensive, they require exacting scrutiny. Programs and their constituent parts must be thoroughly examined and analyzed by Staff in accordance with the MEEIA statute and the Commission's rules.

WHEREFORE, for the reasons stated above, the Staff prays the Commission 1) approve its motion to suspend the procedural schedule in this case, 2) order the parties to conduct weekly discovery conferences, and 3) direct the Staff to file no later than the 15th and the 30th of each month, beginning on August 15, 2018, either a status report or a proposed revised procedural schedule, and order any other relief just in the circumstances.

Respectfully submitted,

/s/ Robert S. Berlin

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⁵Section 393.1075 RSMo

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been electronically mailed this 23rd day of July, 2018 to all counsel of record in this proceeding.

/s/ Robert S. Berlin

Missouri Public Service Commission**Data Request**

Data Request No. 0035
Company Name Union Electric Company-Investor(Electric)
Case/Tracking No. EO-2018-0211
Date Requested 6/13/2018
Issue General Information & Miscellaneous - Other General Info & Misc.
Requested From Geri A Best
Requested By Bob Berlin
Brief Description Non-compliance with 4CSR 20.093(2)(A)

See Attachment

Description Please resubmit all work papers in compliance with 4CSR 20.093(2) (A). Staff has attached a single sample of Ameren Missouri's work papers which is demonstrative of Ameren Missouri's wide-spread non-compliance with the Commission's rule requiring that work papers include executable versions in native format with all links and formulas intact. DR requested by Dana Eaves (dana.eaves@psc.mo.gov).

Due Date 7/3/2018

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EO-2018-0211 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company-Investor(Electric) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person (s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Union Electric Company-Investor(Electric) and its employees, contractors, agents or others employed by or acting in its behalf.

Security Public
Rationale NA

Missouri Public Service Commission**Data Request**

Data Request No.	0057
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	EO-2018-0211
Date Requested	6/19/2018
Issue	MEEIA - DSM - Program Design
Requested From	Geri A Best
Requested By	Bob Berlin
Brief Description	Data source

Description	The following data request refers to the excel file named TRC AnalysisBusiness_Confidential provided as a work paper to supplement Ameren Missouri's MEEIA Cycle 3 application in the Demand Response folder. 1. Please provide the source of the data labeled Benefits/kW Energy in cells I13:I27. Please provide the calculation method as well as the assumptions used to estimate the values. 2. Please provide the source of the data in cell J2 which is labeled as Cost/MW and provide the calculation method as well as the assumptions used to estimate the values. DR requested by J. Luebbert (j.luebbert@psc.mo.gov).
Due Date	7/9/2018

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EO-2018-0211 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company-Investor(Electric) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person (s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Union Electric Company-Investor(Electric) and its employees, contractors, agents or others employed by or acting in its behalf.

Security	Public
Rationale	NA

Missouri Public Service Commission

Data Request

Data Request No.	0057.1
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	EO-2018-0211
Date Requested	7/9/2018
Issue	MEEIA - General Information and Miscellaneous - Other
Requested From	Geri A Best
Requested By	Bob Berlin
Brief Description	Data Source
Description	Please provide support documentation that demonstrates why the value in cell J2 of the excel file named TRC AnalysisBusiness_Confidential provided as a work paper to supplement Ameren Missouri's MEEIA Cycle 3 application in the Demand Response folder is appropriate to use to estimate the cost to obtain MW reduction capacity. DR requested by J. Luebbert (j.luebbert@psc.mo.gov).
Due Date	7/24/2018

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EO-2018-0211 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company-Investor(Electric) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person (s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Union Electric Company-Investor(Electric) and its employees, contractors, agents or others employed by or acting in its behalf.

Security	Public
Rationale	NA

Missouri Public Service Commission

Data Request

Data Request No.	0060
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	EO-2018-0211
Date Requested	6/27/2018
Issue	MEEIA - DSM - Program Design
Requested From	Geri A Best
Requested By	Bob Berlin
Brief Description	Links and formulas

Description This data request is being sent in reference to the work paper titled "DSM without Updated MEEIA3.xlsx" as part of the Earnings Opportunity Folder of the work papers submitted to supplement Ameren Missouri's Application for MEEIA Cycle 3. Please provide this work paper that includes all of the links and formulas intact, including but not limited to: • cells C2:U24 of the tab titled "at Generation by 3-yr Cycles" • cells B2:T6 of the tab titled "at Meter" • cells B2:T3 of the tab titled "at Transmission" • cells B10:T11 of the tab titled "at Transmission" • cells B15:T16 of the tab titled "at Transmission" DR requested by J. Luebbert (j.luebbert @psc.mo.gov).

Due Date 7/17/2018

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EO-2018-0211 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company-Investor(Electric) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person (s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Union Electric Company-Investor(Electric) and its employees, contractors, agents or others employed by or acting in its behalf.

Security	Public
Rationale	NA

Missouri Public Service Commission**Data Request**

Data Request No. 0060.1
Company Name Union Electric Company-Investor(Electric)
Case/Tracking No. EO-2018-0211
Date Requested 7/12/2018
Issue MEEIA - General Information and Miscellaneous - Other
Requested From Geri A Best
Requested By Bob Berlin
Brief Description Links and formulas

Description Ameren Missouri's response to Staff Data Request No. 0060 was a source file for a work paper. Staff requested the file because Ameren did not comply with 4 CSR Chapter 20 rules that require the utility to provide work papers with links and formulas intact. The file provided in response to Staff Data Request No. 0060 also does not have links or formulas intact. Please provide an updated file with links and formulas intact to comply with the rule. DR requested by J. Luebbert (j.luebbert@psc.mo.gov).
Due Date 7/27/2018

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EO-2018-0211 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company-Investor(Electric) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person (s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports,analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Union Electric Company-Investor(Electric) and its employees, contractors, agents or others employed by or acting in its behalf.

Security Public
Rationale NA