

**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 THIRD STATUS REPORT

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), through Staff Counsel’s Office, and for its Third 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 they concur in this status report. In support thereof, the Staff states as follows:

1. As indicated in prior Status Reports, 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.

2. The parties last met on April 27, 2018 and Ameren Missouri last submitted to Staff and Public Counsel another draft of its proposed CAM with most Appendices on May 15, 2018. Staff and Public Counsel are reviewing the proposed language.

3. The parties continue to clarify and narrow the remaining issues. It still is Staff's opinion that the best course of action is for the parties to continue to work at producing an agreed upon CAM.

4. The parties suggest the Commission issue an Order directing the parties to file an agreed upon CAM with the Commission by July 31, 2018, or, alternatively, file

with the Commission, by that date, a further status report respecting the progress made by the parties in this docket and stating whether they have determined by that time that a revised procedural schedule will be needed to resolve any outstanding and necessary CAM issues remaining among them.

5. Proceeding in the manner suggested herein does not prejudice any party's right to (a) make a filing prior to July 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.

6. The parties previously commented that the development of a CAM is a significant undertaking for the parties. That remains true. The Staff would note that there are presently several other CAM cases pending before the Commission involving the drafting of what are intended to be Commission approved CAMs and there is an open Staff investigation regarding the gas supply documentation requirements of the Spire CAM and Standards of Conduct. 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 Third Status Report and requests that the Commission issue an Order directing the parties to file an agreed upon CAM with the Commission by July 31, 2018, or alternatively, file with the Commission, by that date, a further status report respecting the progress made by the parties in this docket and stating whether they have determined by that time that a revised procedural schedule will be needed to resolve any outstanding and necessary CAM issues remaining among them.

Respectfully submitted,

/s/ Mark Johnson

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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 31st day of May, 2018.

/s/ Steven Dottheim