

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri’s Tariffs to Adjust)
its Revenues for Electric Service) **File No. ER-2021-0240**

In the Matter of Union Electric Company)
d/b/a Ameren Missouri’s Tariffs to Adjust)
its Revenues for Natural Gas Service) **File No. GR-2021-0241**

**STAFF RESPONSE TO AMEREN MISSOURI’S TEST YEAR
AND TRUE-UP PROPOSAL**

COMES NOW Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and for its Response to Ameren Missouri’s Test Year and True-up Proposal respectfully states as follows:

1. As stated in the Commission’s *Order Giving Notice, Setting a Deadline to Intervene, Setting a Deadline to Respond to the Test Year, and Directing a Proposed Schedule*¹ (the “First Order”), issued on April 2, 2021, “Ameren Missouri proposes a test year of the twelve months ending December 31, 2020, and further proposes the test year be trued-up through September 30, 2021.”

2. The First Order further provided that “Any party wishing to respond to Ameren Missouri’s proposed test year shall do so no later than May 6, 2021” and that “No later than May 13, 2021, the parties shall submit a joint proposed procedural schedule as described in this order. The Staff of the Commission shall coordinate and file the joint proposed procedural schedule.”

3. Staff does not oppose the test year and true-up proposed by Ameren Missouri as set forth in paragraph 1 above **so long as** the Commission adopts a

¹ The Commission issued similar Orders in both cases captioned above.

procedural schedule for these proceedings approximating the proposed schedule to be filed by Staff on May 13, 2021.

4. Staff would note that on April 7, 2021, the Commission issued an *Order Suspending Tariff, Giving Notice of Contested Case Status, Delegating Authority, and Scheduling an Evidentiary Hearing*² (the “Second Order”) in which the Commission set the date for the evidentiary hearing in these proceedings for October 12 through 15, and October 18 through 22, 2021.

5. Since Ameren Missouri proposes the test year be true-up through September 30, 2021, pursuant to the hearing dates provided in the Second Order, the evidentiary hearing would begin less than two weeks after the end of the proposed true-up, making the proposed true-up impossible. Therefore, if the hearing dates provided in the Second Order are not modified, Staff must oppose the true-up proposed by Ameren Missouri as set forth in paragraph 1.

6. At this time, Staff believes that the proposed procedural schedule to be filed by Staff on May 13, 2021, will be significantly more consistent with the schedules adopted in Ameren Missouri’s past electric rate cases than the dates contained in the Second Order. As stated above, if the Commission adopts a procedural schedule for these proceedings approximating the proposed schedule to be filed by Staff on May 13, 2021, Staff does not oppose the test year and true-up proposed by Ameren Missouri as set forth in paragraph 1 above.

WHEREFORE, Staff respectfully submits this Response to Ameren Missouri’s Test Year and True-up Proposal.

² The Commission issued similar Orders in both cases captioned above.

Respectfully submitted,

/s/ Jeffrey A. Keevil

Jeffrey A. Keevil

Missouri Bar No. 33825

P. O. Box 360

Jefferson City, MO 65102

(573) 526-4887 (Telephone)

(573) 751-9285 (Fax)

Email: jeff.keevil@psc.mo.gov

Attorney for the Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 6th day of May, 2021.

/s/ Jeffrey A. Keevil