

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

In the Matter of the Application of)	
Union Electric Company d/b/a)	<u>Case No. ET-2021-0082</u>
Ameren Missouri for Approval of)	Tracking No. YE-2021-0081
Its Surge Protection Program)	

**LIST OF ISSUES AND ORDER OF WITNESSES AND
ORDER OF CROSS-EXAMINATION**

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through counsel, on behalf of all parties to this matter, and provides below its *List of Issues and Order of Witnesses and Order of Cross-Examination*.

- I. May Ameren Missouri lawfully offer its proposed surge protection program as a regulated program?
- II. If it is lawful, should the Commission approve an Ameren Missouri surge protection program and treat the revenue, expense and investment associated with it as a regulated activity?
- III. If the Commission determines it is appropriate to regulate Ameren Missouri's surge protection program:
 - A. Should it authorize Ameren Missouri to offer its program at the proposed rate and under the requested tariff provisions?
 - B. Should the Commission impose a condition on any approval of the program that requires Ameren Missouri to hold non-participating customers harmless from the revenue requirement associated with the surge protection program?
- IV. Should the Company provide customer education and outreach in conjunction with any program that may be authorized?
- V. Should the Commission require any specific accounting treatment related to the program, apart from that accounting required by the Uniform System of Accounts?
 - A. Should Ameren Missouri be required to separately designate a depreciation expense and return (as defined in Section 393.1400, RSMo.) on capital investments made in the program and included in the PISA deferral mechanism?

- B. Should Ameren Missouri be required to maintain all program records?

ORDER OF OPENINGS

Ameren Missouri
Staff
OPC

ORDER OF WITNESSES

AMEREN MISSOURI

STAFF

OPC

Tom Byrne
Mitchell Lansford
Jared Schneider
Steven M. Wills

Amanda Coffey
Alan Bax
Lisa Ferguson
Sarah Lange

Keri Roth

ORDER OF CROSS-EXAMINATION

**AMEREN MISSOURI
WITNESSES**

STAFF WITNESSES

OPC WITNESSES

Staff
OPC

OPC
Ameren Missouri

Staff
Ameren Missouri

WHEREFORE, Staff respectfully submits this *List of Issues and Order of Witnesses and Order of Cross-Examination* in this case.

Respectfully submitted,

/s/ Whitney Payne

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 26th day of March, 2021, to all counsel of record.

/s/ Whitney Payne