

Exhibit No. 234

Commission Staff – Exhibit 234
Karen Lyons
Surrebuttal/True-Up Direct Testimony
File Nos. ER-2021-0240 & GR-2021-0241

Exhibit No.:

Issues: *Electric Vehicle
Employee Incentive,
Charge Ahead True Up,
Pay as You Save True Up*

Witness: *Karen Lyons*

Sponsoring Party: *MoPSC Staff*

Type of Exhibit: *Surrebuttal / True-Up Direct*

Case No.: *ER-2021-0240 November 5,*

Date Testimony Prepared: *2021*

MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL AND BUSINESS ANALYSIS DIVISION

AUDITING

SURREBUTTAL/TRUE-UP DIRECT TESTIMONY

OF

KAREN LYONS

**UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri**

CASE NO. ER-2021-0240

*Jefferson City, Missouri
November 2021*

1 A. The purpose of my Surrebuttal and True-Up Direct Testimony is to respond to
2 statements and positions taken by Ameren Missouri witness Mitchell Lansford in his rebuttal
3 testimony that address the inclusion of the electric vehicle employee incentive program costs.
4 I will also identify the adjustments I will be sponsoring in Staff's true-up accounting schedules.

5 **ELECTRIC VEHICLE EMPLOYEE INCENTIVE**

6 Q. Please summarize Ameren Missouri's position regarding Staff's accounting
7 treatment of the electric vehicle incentive program costs.

8 A. Beginning on page 29, line 2 of his rebuttal testimony, Mr. Lansford states,

9 The payment of a small (\$1,500 to \$2,500) incentive to Company
10 employees to early-adopt electric vehicle technology is beneficial to
11 customers. Adoption of electric vehicle technology increases electric
12 revenue volumes, allowing customer rates to decline (holding all other
13 factors constant). Additionally, this incentive improves employee
14 engagement, attraction, and retention and helps employees set a good
15 example for Company customers. Staff's proposed disallowance has not
16 been supported and fails to consider the above factors.

17 Q. Do you agree with Mr. Lansford's statement that rates are reduced with
18 increased revenues from this incentive program?

19 A. No. Mr. Lansford suggests that the electric vehicles purchased by Ameren
20 Missouri employees increases revenues and with all other factors held constant, reduces rates.

21 ** [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]

¹ Case No. ER-2021-0240 Response to Staff Data Request No. 0342, Schedule KL-s2.

1 [REDACTED]

2 [REDACTED] **

3 Q. Do you agree with Mr. Lansford's statement that this incentive improves
4 employee engagement, attraction, and retention and helps employees set a good example for
5 Company customers?

6 A. It appears that Mr. Lansford is suggesting that the electric vehicle employee
7 incentive is comparable to other employee benefits and salaries that can be tied to engagement,
8 attraction, and retention of employees². Staff does not consider the electric vehicle employee
9 incentive program an employee benefit. ** [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED] ** For this reason, the electric vehicle employee incentive is not akin to
17 employee benefits, which are available to all Ameren Missouri employees.

18 Q. Do you agree that the electric vehicle employee incentive program helps
19 employees set a good example for Company customers as suggested by Mr. Lansford?

20 A. Staff is unclear how Ameren Missouri employees set a good example for their
21 customers by simply receiving an incentive to purchase or lease an electric vehicle. In response

² Case No. ER-2021-0240, Staff Data Request No. 0342.1, Schedule KL-s3.

1 to Staff Data Request No. 0342.1, attached as Schedule KL-s3 to this testimony, the incentive
2 was offered to get Ameren Missouri employees to share their experience with electric vehicles
3 to family, friends, and neighbors. Staff understands that there is no requirement for Ameren
4 Missouri employees that participate in the incentive program to promote electric vehicles
5 through an Ameren-sponsored event, informal discussions with the general public, or
6 discussions with the employees' friends and family. If Ameren Missouri wants its employees
7 to set a good example by talking about electric vehicles that were purchased using an incentive
8 provided by the Company, while providing no benefit to the customer, its shareholders should
9 be held responsible for the cost.

10 Q. Are there other options that Ameren Missouri can do to promote electric vehicles
11 that actually benefit its customers?

12 A. Yes. Ameren Missouri can utilize electric vehicles in its fleet. Ameren Missouri
13 currently has 18 electric vehicles, used for various functions in utility operations, in its fleet³.
14 The use of these vehicles not only promotes electric vehicles, if seen by the public, but also
15 provide a benefit to customers since they are used in providing utility service to Ameren
16 Missouri customers.

17 Q. Are there other incentives available to Ameren Missouri employees that would
18 like to purchase an electric vehicle?

19 A. Yes. In response to Staff Data Request No. 0342.2, Ameren Missouri employees
20 are eligible for electric car discounts with local dealers⁴.

³ Case No. ER-2021-0240, Staff Data Request No. 0342.3, Schedule KL-s4

⁴ Case No. ER-2021-0240, Staff Data Request No. 0342.2, Schedule KL-s5

1 Q. Is Staff's position that Ameren Missouri should not offer its employees an
2 incentive to purchase or lease an electric vehicle?

3 A. No. As Mr. Lansford states in his rebuttal testimony, the amount of incentive is
4 "small". It is Staff's opinion that Ameren Missouri customers do not benefit from this employee
5 incentive program and therefore the costs should not be included in Ameren Missouri's cost of
6 service. If Ameren Missouri wants to provide this small incentive to its employees, it can do
7 so at the expense of the shareholders, not the ratepayers.

8 **TRUE-UP DIRECT**

9 Q. What cost of service items are you recommending to true up through
10 September 30, 2021?

11 A. I am sponsoring Staff's true-up adjustments for the PAYS regulatory asset and
12 the Charge Ahead program.

13 Q. How did Staff true-up the Charge Ahead program?

14 A. Consistent with its recommendation in Staff's COS Report. Staff included an
15 annual amortization, based on a seven year period, for the regulatory asset balance as of the
16 true up period, September 30, 2021.

17 Q. How did Staff true-up the PAYS regulatory asset?

18 A. Consistent with the Stipulation and Agreement in Case No. EO-2018-0211, the
19 regulatory asset balance as of the true up period, September 30, 2021 is included in the rate
20 base schedule of Staff's true-up accounting schedules. Staff also included an annual
21 amortization based on the weighted average useful life of the measures installed.

Surrebuttal/True-Up Direct Testimony of
Karen Lyons

1 Q. Is Staff's recommended amortization period for the true-up consistent with its
2 recommendation in its COS Report?

3 A. No. Staff recommended a ten year amortization for the PAYS program in its
4 COS Report. Mr. Lansford stated in his rebuttal testimony⁵ that the regulatory asset should be
5 amortized based on the weighted average useful life of the measures installed. After further
6 review of the Stipulation and Agreement in Case No. EO-2018-0211, Staff determined that
7 Mr. Lansford's recommendation is consistent with the Stipulation and Agreement. As a result,
8 Staff revised the amortization period to be consistent with the weighted average useful life of
9 the measures installed.

10 Q. Does this conclude your surrebuttal / true-up direct testimony?

11 A. Yes.

⁵ Case No ER-2021-0240, Mitchell Lansford Rebuttal Testimony, page 23, lines 2-7.

Educational and Employment Background and Credentials

of Karen Lyons

I am currently employed as a Utility Regulatory Supervisor for the Missouri Public Service Commission (“Commission”). I was employed by the Commission in April 2007. Previously, I was employed by AT&T as a Regulatory Complaint Manager from December 1999 to February 2007. In that capacity I was responsible for addressing consumer and business complaints filed with various state and federal regulatory agencies. I earned a Bachelor of Science degree in Management Accounting and a Master’s in Business Administration from Park University.

As a Utility Regulatory Supervisor, I have assisted, conducted, and supervised audits of electric, natural gas, steam, and water and sewer utility companies operating within the state of Missouri. I have participated in numerous rate cases, merger cases, certificate cases, and ISRS cases and filed testimony on a variety of topics.

Cases I have participated in are shown in the following table:

Year	Case/Tracking Number	Company Name	Type of Testimony/Issue
2021	ER-2021-0240	Ameren Missouri-General Rate Case	Surrebuttal/True Up: Electric Vehicle Employee Incentive, Charge Ahead Program, Pay as You Save Program
2021	WA-2022-0049 and SA-2022-0050 (Pending)	Missouri American Certificate of Convenience and Necessity (CCN)	
2021	EA-2022-0043 (Pending)	Evergy Missouri Metro and Evergy Missouri West (CCN)	
2021	EO-2022-0105 (Pending)	Evergy Missouri Metro (Sale of Assets)	
2020-2021	GR-2021-0108 Contested	Spire Missouri-General Rate Case	Case Coordinator Direct: Propane Investment Natural Gas Inventories EnergyWise and Insulation Financing Programs St Peters Lateral Rebuttal: Research and Development Costs Surrebuttal: Propane Investment
2021	EO-2021-0032	Evergy Missouri Metro and Evergy Missouri West	Investigatory Docket –Elliott Management

Year	Case/Tracking Number	Company Name	Type of Testimony/Issue
2020	SA-2021-0074	Missouri American Water Company (Sewer) Certificate of Convenience and Necessity (CCN)	Staff Memorandum-Supervisory Oversight
2020	SA-2021-0017 (Pending) Contested	Missouri American Water Company (Sewer) Certificate of Convenience and Necessity (CCN)	Staff Memorandum-Supervisory Oversight
2020	GO-2021-0031 (Stipulated)	Spire West-Infrastructure System Replacement Surcharge (ISRS)	Staff Memorandum
2020	GO-2021-0030 (Stipulated)	Spire West-Infrastructure System Replacement Surcharge (ISRS)	Staff Memorandum
2020	GA-2021-0010	Spire Missouri- Certificate of Convenience and Necessity (CCN)	Staff Memorandum-Supervisory Oversight
2020	WR-2020-0264 (Unanimous Disposition Agreement)	The Raytown Water Company (Water Rate Case)	Staff Memorandum-Supervisory Oversight
2020	WM-2020-0174	Liberty Utilities (Missouri Water) Acquisition	Staff Memorandum-Supervisory Oversight
2020	GO-2016-0332, GO-2016-0333 and GO-2017-0201, GO-2017-0202 (Remand Cases-Stipulated)	Spire Missouri-Infrastructure System Replacement Surcharge (ISRS)	Staff Memorandum-Refund calculation
2020	GO-2018-0309 and GO-2018-0310 (Remand Cases-Stipulated)	Spire Missouri-Infrastructure System Replacement Surcharge (ISRS)	Staff Direct Report-Refund calculation
2020	GO-2020-0230 (Stipulated)	Spire West-Infrastructure System Replacement Surcharge (ISRS)	Staff Memorandum Direct: Income Taxes
2020	GO-2020-0229 (Stipulated)	Spire East-Infrastructure System Replacement Surcharge (ISRS)	Staff Memorandum Direct: Income Taxes
2020	GA-2020-0251	Summit Natural Gas of Missouri (CCN)	Staff Memorandum-Supervisory Oversight
2020	SM-2020-0146	Elm Hills Utility Operating Company (Acquisition)	Staff Memorandum
2019	GA-2020-0105	Spire Missouri, Inc Certificate of Convenience and Necessity (CCN)	Staff Memorandum-Supervisory Oversight
2020	ER-2019-0374	Empire District Electric Company (Electric Rate Case)	CWC- Supervisory Oversight
2019-2020	ER-2019-0335 (Stipulated)	Union Electric Company, d/b/a Ameren Missouri (Electric Rate Case)	Direct: Cloud Computing, Electric Vehicle Employee Incentive, Charge Ahead Program Rebuttal: Cloud Computing, Paperless Bill Credit, Time of Use Pilot Tracker
2019	WA-2019-0364 & SA-2019-0365 (Proceedings Stayed)	Missouri American Water Company (CCN)	Supervisory Oversight
2019	WA-2019-0366 & SA-2019-0367 (Dismissed)	Missouri American Water Company (CCN)	Supervisory Oversight

Year	Case/Tracking Number	Company Name	Type of Testimony/Issue
2019	GO-2019-0357 (Contested)	Spire West-Infrastructure System Replacement Surcharge (ISRS)	Staff Memorandum Direct: Income Taxes
2019	GO-2019-0356 (Contested)	Spire East-Infrastructure System Replacement Surcharge (ISRS)	Staff Memorandum Direct: Income Taxes
2019	WO-2019-0184 (Contested)	Missouri American Water Company (ISRS)	Staff Memorandum Direct: Net Operating Loss Rebuttal: Net Operating Loss
2019	SA-2019-0161	United Services, Inc (CCN)	Staff Memorandum
2019	SA-2019-0183	Missouri American Water Company (CCN)	Staff Memorandum
2018	ER-2018-0145 (Stipulated)	Kansas City Power & Light Company (Electric Rate Case)	Direct: Greenwood Solar, Cash Working Capital, Transmission Revenue, Ancillary Services, Transmission Congestion Rights, Revenue Neutral Uplift charges, Off System Sales, Missouri Iowa Nebraska Transmission Line Losses, IT Software, Insurance, Injuries and Damages, Common Use Plant Billings, Income Taxes, Kansas City earning tax, ADIT, TCJA impacts Rebuttal: Injuries and Damages, Sibley and Montrose O&M Surrebuttal: Greenwood Solar, Injuries and Damages, Kansas City Earnings Tax, Income Taxes
2018	ER-2018-0146 (Stipulated)	KCP&L Greater Missouri Operations Company (Electric Rate Case)	Direct: Greenwood Solar, Cash Working Capital, Transmission Revenue, Ancillary Services, Transmission Congestion Rights, Revenue Neutral Uplift charges, Off System Sales, Missouri Iowa Nebraska Transmission Line Losses, IT Software, Insurance, Injuries and Damages, Common Use Plant Billings, Income Taxes, Kansas City earning tax, ADIT, TCJA impacts Rebuttal: Injuries and Damages, Sibley and Montrose O&M Surrebuttal: Greenwood Solar, Injuries and Damages, Kansas City Earnings Tax, Income Taxes

Year	Case/Tracking Number	Company Name	Type of Testimony/Issue
2017	GR-2017-0215 and GR-2017-0216-Contested	Laclede Gas and Missouri Gas Energy (Gas Rate Case)	<p>Direct: Cash Working Capital, JJ's incident, Environmental costs, Property Taxes, Kansas Property Taxes, Cyber Security Costs, Energy Efficiency, Low Income Energy Assistance Program, One time Energy Affordability Program, Low Income Weatherization, Red Tag Program</p> <p>Rebuttal: Cyber-Security, Environmental and Kansas Property Tax Trackers, St Peters Lateral Pipeline</p> <p>Surrebuttal: Kansas Property Tax, Cash Working Capital, Energy Efficiency, JJ's related costs, Rate base treatment of Red Tag Program, St Peters pipeline lateral and MGE's one-time Energy Affordability Program</p> <p>Litigated: Kansas Property taxes and Trackers</p>

Year	Case/Tracking Number	Company Name	Type of Testimony/Issue
2016-2017	ER-2016-0285-Contested	Kansas City Power & Light Company (Electric Rate Case)	<p>Direct: Greenwood Solar, Fuel Inventories, Transmission Revenue, Ancillary Services, Transmission Congestion Rights, Market to Market Sales, Revenue Neutral Uplift charges, Fuel additives, Purchase Power, Fuel prices, Off System Sales IT Software, FERC Assessment, SPP Administrative fees, Transmission expense, CIP and Cyber Security, Depreciation Clearing, ERPP, Surface Transportation Board Reparation Amortization</p> <p>Rebuttal: Transmission expense/revenue and Property tax Forecasts/Trackers, Wholesale Transmission Revenue</p> <p>Surrebuttal Transmission expense/revenue and Property tax Forecasts/Trackers, Wholesale Transmission Revenue, Transmission Wholesale Revenue, Greenwood Solar</p> <p>True-up Direct: Transmission Expense and Revenue, Transmission Congestion Rights</p> <p>True-up Rebuttal: Transmission Expense</p> <p>Litigated: Transmission Expense</p>

Year	Case/Tracking Number	Company Name	Type of Testimony/Issue
2016	ER-2016-0156-Stipulated	KCP&L Greater Missouri Operations Company (Electric Rate Case)	<p>Direct: Greenwood Solar, Fuel Inventories, Transmission Revenue, Ancillary Services, Transmission Congestion Rights, Market to Market Sales, Revenue Neutral Uplift charges, Fuel additives, Purchase Power, Fuel prices, Off System Sales IT Software Maintenance, FERC Assessment, SPP Administrative fees, Transmission expense, CIP and Cyber Security, Depreciation Clearing, Amortization of Regulatory Liabilities and Assets, Transource</p> <p>Rebuttal: Cyber-Security and Transmission expense/revenue Forecasts/Trackers, Wholesale Transmission Revenue</p> <p>Surrebuttal: Cyber-Security and Transmission expense/revenue Forecasts/Trackers, Crossroad Transmission expense, Wholesale Transmission Revenue, Greenwood Solar, Amortizations</p>
2016	EA-2015-0256-Contested	KCP&L Greater Missouri Operations Company (Solar CCN)	<p>Deposition</p> <p>Direct and Rebuttal Testimony: No pre-filed testimony. Live testimony during hearing</p>
2015	WO-2016-0098	Missouri American Water Company- Infrastructure Service Replacement Surcharge (ISRS Reconciliation)	Staff Memorandum

Year	Case/Tracking Number	Company Name	Type of Testimony/Issue
2015	ER-2014-0370-Contested	Kansas City Power & Light Company (Electric Rate Case)	<p>Direct: Fuel Inventories, Transmission Revenue, Ancillary Services, Transmission Congestion Rights, Market to Market Sales, Revenue Neutral Uplift charges, Fuel additives, Purchase Power, Fuel prices, IT Roadmap O&M, FERC Assessment, SPP Administrative fees, Transmission expense, Research and Development Tax Credit,</p> <p>Rebuttal: Property Tax, Vegetation Management and Cyber Security Trackers, SPP Region-Wide Transmission, Transmission Wholesale Revenue</p> <p>Surrebuttal: Property Tax, Vegetation Management and Cyber Security and Transmission Trackers, SPP Region-Wide Transmission, Transmission Wholesale Revenue, Transmission Expense</p> <p>True-up Rebuttal: Independence Power & Light Transmission Expense</p> <p>Litigated Issues: Transmission expense, Property Tax expense, CIP/Cyber Security expense, Independence Power & Light Transmission Expense</p>
2014	HR-2014-0066-Stipulated	Veolia Energy Kansas City, Inc. (Steam Rate Case)	<p>Direct: Fuel Inventories, Prepayments, Material Supplies, Customer Deposits, Fuel Expense, Purchased Power, Environmental Fees, Miscellaneous Non-Recurring Expenses</p>
2014	GR-2014-0007-Stipulated	Missouri Gas Energy Company (Gas Rate Case)	<p>Direct: Cash Working Capital, Revenues, Bad Debt, Outside Services, Environmental costs, Energy Efficiency, Regulatory Expenses, Amortization Expense, System Line Replacement costs, Property taxes, Kansas Property taxes</p> <p>Surrebuttal: Property taxes, Cash Working Capital, Manufactured Gas Plant costs</p>
2013	GO-2013-0391	Missouri Gas Energy - Infrastructure Service Replacement Surcharge (ISRS)	Staff Memorandum
2013	WM-2013-0329	Bilyeu Ridge Water Company, LLC (Water Sale Case)	Staff Memorandum

Year	Case/Tracking Number	Company Name	Type of Testimony/Issue
2012	ER-2012-0175-Contested	KCP&L Greater Missouri Operations Company (Electric Rate Case)	Direct: Revenues, L&P Revenue Phase In, Maintenance, L&P Ice Storm AAO, Iatan 2 O&M, Bad Debt, Outsourced Meter reading, Credit Card fees, ERPP, Renewable Energy Costs Rebuttal: Bad Debt, Property tax tracker, Renewable Energy Costs Surrebuttal: Bad Debt, Renewable Energy Costs, Property tax tracker, Revenues, L&P Ice Storm AAO, L&P Revenue Phase In, Credit and Debit Card fees
2012	ER-2012-0174-Contested	Kansas City Power & Light Company (Electric Rate Case)	Direct: Revenues, Maintenance, Wolf Creek Refueling, Nuclear Decommissioning, Iatan 2 O&M, Hawthorn V SCR, Hawthorn V Transformer, Bad Debt, Credit Card fees, ERPP, Demand Side Management costs, Renewable Energy Costs Rebuttal: Bad Debt, Property tax tracker, Renewable Energy Costs Surrebuttal: Bad Debt, Hawthorn SCR and Transformer, Renewable Energy Costs, Property tax tracker, Revenues, Credit and Debit card fees.
2012	WM-2012-0288	Valley Woods Water Company, Inc. (Water Sale Case)	Staff Memorandum
2012	GO-2012-0144	Missouri Gas Energy - Infrastructure Service Replacement Surcharge (ISRS)	Staff Memorandum
2011	HR-2011-0241-Stipulated	Veolia Energy Kansas City, Inc. (Steam Rate Case)	Direct: Revenues, Allocations, Income Taxes, Miscellaneous Non-recurring expenses
2010-2011	ER-2010-0356-Contested	KCP&L Greater Missouri Operations Company (Electric Rate Case)	Direct: Plant/Reserve, Cash Working Capital, Maintenance, Ice Storm AAO, Iatan 2 O&M, Depreciation Clearing, Property Taxes, Outsourced Meter reading, Insurance, Injuries and Damages Rebuttal: Property Tax, Maintenance Surrebuttal: Property Tax,

Year	Case/Tracking Number	Company Name	Type of Testimony/Issue
2010-2011	ER-2010-0355-Contested	Kansas City Power & Light Company (Electric Rate Case)	Direct: Plant/Reserve, Cash Working Capital, Maintenance, Wolf Creek Refueling, Nuclear Decommissioning, Maintenance, Iatan 2 O&M, Depreciation Clearing, Hawthorn V SCR Impairment, Property Taxes, Insurance, Injuries and Damages Rebuttal: Property Tax, CWC-Gross Receipts Tax, Maintenance Surrebuttal: Property Tax, CWC-Gross Receipts Tax, Maintenance, Injuries and Damages, Decommissioning Expense, Litigated: Hawthorn V SCR Settlement, Hawthorn V Transformer Settlement
2011	SA-2010-0219	Canyon Treatment Facility, LLC (Certificate Case)	Staff Memorandum
2010	WR-2010-0202	Stockton Water Company (Water Rate Case)	Staff Memorandum
2010	SR-2010-0140	Valley Woods Water Company (Water Rate Case)	Staff Memorandum
2010	WR-2010-0139	Valley Woods Water Company (Sewer Rate Case)	Staff Memorandum
2010	SR-2010-0110	Lake Region Water and Sewer (Sewer Rate Case)	Direct: Plant and Reserve, CIAC, PSC Assessment, Property Taxes, Insurance, Injuries and Damages, Rate Case Expense, Other Operating Expenses, Allocations
2010	WR-2010-0111	Lake Region Water and Sewer (Water Rate Case)	Direct: Plant and Reserve, CIAC, PSC Assessment, Property Taxes, Insurance, Injuries and Damages, Rate Case Expense, Other Operating Expenses, Allocations
2009	GR-2009-0355-Stipulated	Missouri Gas Energy (Gas Rate Case)	Direct: Cash Working Capital
2009	ER-2009-0090-Global Settlement	KCP&L Greater Missouri Operations Company (Electric Rate Case)	Direct: Plant/Reserve, Cash Working Capital, Maintenance, Depreciation Clearing, Property Taxes, Bank Fees, Insurance, Injuries and Damages, Ice Storm AAO Rebuttal: Property Tax, CWC-Gross Receipts Tax Surrebuttal: Property Tax, CWC Gross Receipts Tax, Maintenance, Injuries and Damages

Year	Case/Tracking Number	Company Name	Type of Testimony/Issue
2009	HR-2009-0092-Global Settlement	KCP&L Greater Missouri Operations Company (Steam Rate Case)	Direct: Plant/Reserve, Cash Working Capital, Maintenance, Property Taxes, Bank Fees, Insurance, Injuries and Damages Rebuttal: Property Tax
2009	ER-2009-0089-Global Settlement	Kansas City Power & Light Company (Electric Rate Case)	Direct: Plant/Reserve, Cash Working Capital, Maintenance, Depreciation Clearing, Hawthorn V Subrogation proceeds, Hawthorn V Transformer, DOE Refund, Property Taxes, Bank Fees, Insurance, Injuries and Damages, Ice Storm AAO Rebuttal: Property Tax, CWC-Gross Receipts Tax Surrebuttal: Property Tax, CWC Gross Receipts Tax, Maintenance, Injuries and Damages
2008	HR-2008-0300-Stipulated	Trigen Kansas City Energy Corporation (Steam Rate Case)	Direct: Johnson Control Contract, Payroll, Payroll Taxes, and Benefits, Allocations, Insurance
2008	WR-2008-0314	Spokane Highlands Water Company (Water Rate Case)	Staff Memorandum
2007	GO-2008-0113	Missouri Gas Energy - Infrastructure Service Replacement Surcharge (ISRS)	Staff Memorandum

SCHEDULE KL-s2

HAS BEEN DEEMED

CONFIDENTIAL

IN ITS ENTIRETY

Missouri Public Service Commission

Respond Data Request

Data Request No.	0342.1
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	ER-2021-0240
Date Requested	9/23/2021
Issue	General Information & Miscellaneous - Other General Info & Misc.
Requested From	Geri Best
Requested By	Jeff Keevil
Brief Description	Electric Vehicle Incentive Program-benefits/requirements
Description	1.Provide the benefits that customers receive by Ameren Missouri employees receiving an incentive to purchase electric vehicles for their personal use. 2. Are there requirements of Ameren Missouri employees that participate in the incentive program to promote electric vehicles? If so, provide all the requirements. DR requested by Karen Lyons (Karen.lyons@psc.mo.gov)
Response	Please see the attached response.
Objections	NA

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 if, during the pendency of Case No. ER-2021-0240 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

Ameren Missouri's
Response to MPSC Data Request - MPSC
ER-2021-0240

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues
for Electric Service

No.: MPSC 0342.1

1. Provide the benefits that customers receive by Ameren Missouri employees receiving an incentive to purchase electric vehicles for their personal use. 2. Are there requirements of Ameren Missouri employees that participate in the incentive program to promote electric vehicles? If so, provide all the requirements. DR requested by Karen Lyons (Karen.lyons@psc.mo.gov)

RESPONSE

Prepared By: Patrick Justis
Title: Manager, Efficient Electrification
Date: 9/30/21

1. EV Incentives for employees were initiated as a benefit for attracting and retaining employees.

Additionally, while not the primary reason for offering employees incentives for EVs, Ameren Missouri employees that drive electric vehicles (EVs) are considered informal "ambassadors" for EVs because, like with any newer technology, those with experience tend to share that experience with other family members, neighbors, friends, and coworkers. I have found that most of our coworker EV drives are passionate about their EV experience and many are quick to volunteer to help out at customer-facing or internal EV events.

2. There is no requirement to promote EVs.

Missouri Public Service Commission

Respond Data Request

Data Request No.	0342.3
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	ER-2021-0240
Date Requested	9/23/2021
Issue	General Information & Miscellaneous - Other General Info & Misc.
Requested From	Geri Best
Requested By	Jeff Keevil
Brief Description	Electric vehicle-fleet
Description	Does Ameren Missouri have any electric vehicles in its fleet? If so, provide the number of electric vehicles and the make and year of each vehicle in the fleet. DR requested by Karen Lyons (Karen.lyons@psc.mo.gov)
Response	Please see the attached response.
Objections	NA

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 if, during the pendency of Case No. ER-2021-0240 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

Ameren Missouri's
Response to MPSC Data Request - MPSC
ER-2021-0240

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues
for Electric Service

No.: MPSC 0342.3

Does Ameren Missouri have any electric vehicles in its fleet? If so, provide the number of electric vehicles and the make and year of each vehicle in the fleet. DR requested by Karen Lyons (Karen.lyons@psc.mo.gov)

RESPONSE

Prepared By: Patrick Justis
Title: Manager, Efficient Electrification
Date: 10/5/21

2012 Nissan Leaf – 1
2012 Chevy Volt – 2
2013 Ford Focus Electric – 1
2016 Nissan Leaf – 4
2019 Chevy Bolt EV – 1
2019 Lightning Systems Electric Shuttle – 1
2019 Motiv Electric Box Truck – 1
2019 Pacific Plug-in Hybrid - 4
2021 Ford Mustang Mach E – 3

Missouri Public Service Commission

Respond Data Request

Data Request No.	0342.2
Company Name	Union Electric Company-Investor(Electric)
Case/Tracking No.	ER-2021-0240
Date Requested	9/23/2021
Issue	General Information & Miscellaneous - Other General Info & Misc.
Requested From	Geri Best
Requested By	Jeff Keevil
Brief Description	Electric vehicle-fleet
Description	Provide a list of all electric vehicle manufacturer/dealership discounts currently available to Ameren Missouri employees. DR requested by Karen Lyons (Karen.lyons@psc.mo.gov)
Response	Please see the attached response.
Objections	NA

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 if, during the pendency of Case No. ER-2021-0240 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

Ameren Missouri's
Response to MPSC Data Request - MPSC
ER-2021-0240

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues
for Electric Service

No.: MPSC 0342.2

Provide a list of all electric vehicle manufacturer/dealership discounts currently available to Ameren Missouri employees. DR requested by Karen Lyons (Karen.lyons@psc.mo.gov)

RESPONSE

Prepared By: Patrick Justis
Title: Manager, Efficient Electrification
Date: 10/7/21

Specific to EVs, the following are the discounts local dealers have offered to Ameren employees:

- ELCO Chevy Ameren Employee discount - <https://www.elcochevrolet.com/Ameren>
- Bommarito Nissan (both stores)/Bommarito Ford/VW Hazelwood – Ameren employees receive special discount on any new EV, ask for Kevin Hall (314-276-8255)

There may be general discounts available to Ameren employees offered by vehicle manufacturers and at the time of this Data Request the following was listed, though may not be up to date. These may or may not relate to electric vehicles.

Vehicles

Company: BMW
Discount/Offer: Varies depending on vehicle selected

Company: Chrysler
Discount/Offer: Usually 1% below factory invoice.
How to Redeem: Obtain your Personal Control Number online (or call
888.444.4321) by clicking on "Get New Control Number"
See Details or FAQs for more information.

Company: Enterprise Car Sales
Discount/Offer: Varies depending on vehicle selected.

How to Redeem: Details coming soon.

Company: Ford
Discount/Offer: Varies depending on vehicle selected
How to Redeem: Obtain a Personal Identification Number online (or call
877.975.2600)

Company: Honda Preferred Pricing Program
Discount/Offer: Varies depending on vehicle selected
How to Redeem: See Details for more information.

Company: GM (discount available to active employees only)
Discount/Offer: Varies depending on vehicle selected
How to Redeem:

Company: Lou Fusz Corporate Partner Program
Discount/Offer: View Current Discount Flyer.
How to Redeem: See Details for more information.

Company: Volvo
Discount/Offer: Varies depending on vehicle selected
How to Redeem: Obtain a Personal Identification Number online and enter
See Details for more information.