

**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 STATUS REPORT

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), through Staff Counsel’s Office, and for its status report submits the following. Counsel for both Union Electric Company d/b/a Ameren Missouri and the Office of the Public Counsel (“Public Counsel”) have authorized undersigned counsel to state that said additional parties concur in this status report. In support thereof, the Staff states as follows:

1. On June 30, 2017, the parties to File No. EO-2017-0176, filed a Joint Motion of Union Electric Company d/b/a Ameren Missouri, the Staff of the Missouri Public Service Commission, and the Office of the Public Counsel to Suspend Procedural Schedule because the parties believed they were making good progress and the best path forward was to allow the parties to continue to work together without the constraints of imminent deadlines and milestones of the then current procedural schedule. The parties requested that the Commission issue an Order suspending the current procedural schedule through October 31, 2017, and require Staff (either individually or jointly with Ameren Missouri and/or Public Counsel) to file a status report on or before October 31, 2017, indicating the progress being made and the issue areas that remained unresolved.

2. On July 3, 2017, the Commission issued an Order Canceling Procedural Schedule. The Commission also directed Staff no later than October 31, 2017, to file a status report detailing the progress being made toward an agreed-upon CAM, what issues remain unresolved, and whether a revised procedural schedule will be needed to resolve those issues.

3. The parties held another technical conference on July 28, 2017. Among other things, Staff advised Ameren Missouri and Public Counsel that based on the discussions that had occurred and the information provided by Ameren Missouri through data request responses and the various technical conferences, Staff would next produce a Staff redrafting of the draft of the Ameren Missouri CAM and Appendices which Ameren Missouri had provided to Staff and Public Counsel on May 16, 2017, as required by the original Procedural Schedule. On the evening of Friday, September 8, 2017, Staff e-mailed to Ameren Missouri and Public Counsel, its redraft of the Ameren Missouri CAM and Appendices, interspersed with questions and comments of Staff. Staff provided as complete a redraft as possible, however, it also e-mailed to Ameren Missouri some additional questions and a list of additional documents that Staff determined it needed to review in order to complete its redraft.

4. After a few weeks, Ameren Missouri advised Staff and Public Counsel that it had taken Ameren Missouri that amount of time to get through the Staff's materials given other Commission cases and other matters, and it would need a few more weeks to examine the details of Staff's redraft, to consult with the necessary company personnel about Staff's redraft, and to respond to Staff's additional information requests.

Ameren Missouri e-mailed its responses including the requested documents to Staff and Public Counsel on October 23, 2017.

6. Another technical conference was held on October 26, 2017, at which Ameren Missouri asked Staff questions about various matters in its redraft of the Ameren Missouri CAM and Appendices. In part because of the demands of other Commission cases, and the amount of work involved in generating a redlined version of Staff's September 8, 2017, redraft, Ameren Missouri informed Staff and Public Counsel not to expect a redlined version until sometime in December 2017. Staff advised Ameren Missouri and Public Counsel that having received the requested Ameren Missouri documents, it would proceed to complete its redraft of the Ameren Missouri CAM and Appendices and provide the remaining portions as completed.

7. At this stage, 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. It is Staff's opinion that the best course of action is for the parties to continue to work at producing an agreed upon CAM.

8. Staff recommends that the Commission issue an Order directing Staff to file another status report to the Commission by March 1, 2018, respecting the progress being made by the parties in this docket and whether a revised procedural schedule will be needed to resolve issues.

9. Proceeding in the manner suggested herein does not prejudice any party's right to (a) make a filing prior to March 1, 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 March 1, 2018, status report within 10 days thereof.

10. The parties commented in their June 30, 2017, Joint Motion to Suspend Procedural Schedule that the development of a CAM is a significant undertaking for the parties. That remains true. The Staff would note that there are presently two additional CAM cases¹ pending before the Commission involving the drafting of what are intended to be Commission approved CAMs. 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 status report and requests that the Commission issue an Order directing the Staff to file another status report to the Commission by March 1, 2018, respecting the progress being made by the parties in this docket, whether a revised procedural schedule will be needed to resolve issues, and other matters as further suggested hereinabove.

¹ File No. GO-2012-0322: In the Matter of the Application of Summit Natural Gas of Missouri, Inc. for Approval of its Cost Allocation Manual

File No. AO-2017-0360: In the Matter of the Application of The Empire District Electric Company, The Empire District Gas Company, Liberty Utilities (Midstates Natural Gas) Corp., and Liberty Utilities (Missouri Water) LLC for Approval of Their Cost Allocation Manual

Respectfully submitted,

/s/ Steven Dottheim

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**Attorneys for the Staff of the
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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 October, 2017.

/s/ Steven Dottheim