

Exhibit No.:

*Issue(s): Training & Travel
Costs, Employee
Benefits, Incentive
Compensation,
Pensions & OPEBs,
Rate Case Expense,
Property Tax Expense,
Energy Efficiency
Regulatory Asset &
Rate Base*

Witness: Jane C. Dhority

Sponsoring Party: MoPSC Staff

Type of Exhibit: Direct Testimony

Case No.: GR-2024-0106

Date Testimony Prepared: July 18, 2024

MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL AND BUSINESS ANALYSIS DIVISION

AUDITING DEPARTMENT

DIRECT TESTIMONY

OF

JANE C. DHORITY

LIBERTY UTILITIES (Midstates Natural Gas) CORP.,

d/b/a Liberty

CASE NO. GR-2024-0106

Jefferson City, Missouri

July 2024

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JANE C. DHORITY

LIBERTY UTILITIES (Midstates Natural Gas) CORP.,

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CASE NO. GR-2024-0106

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1 Q. What information did Staff review as part of its audit of Liberty Midstates'
2 training and travel costs?

3 A. Staff reviewed five years of historic training and travel expense levels directly
4 charged or allocated to Liberty Midstates, data request responses, and the Company's
5 workpapers.

6 Q. What is Staff's recommended treatment of training and travel costs in this
7 rate case?

8 A. Staff recommends including an ongoing level of expense for these activities
9 based on actual recoverable training and travel costs incurred during the 2022 test year.

10 Q. How did Staff approach its adjustment for this issue?

11 A. Staff made an adjustment to remove labor and postage expenses included in test
12 year training and travel costs to prevent double recovery of such costs, as these items are being
13 addressed by other Staff as part of this rate case. Staff made further adjustments to test year
14 costs to remove amounts pertaining to sales and marketing, and business development, as these
15 costs provide no benefit to Liberty Midstates ratepayers, and are not necessary for the provision
16 of safe and adequate service at just and reasonable rates. Finally, Staff made adjustments to
17 remove allocated costs for which the Company did not provide any support and where no direct
18 quantifiable benefit to Liberty Midstates gas ratepayers could be determined.

19 **EMPLOYEE BENEFITS**

20 Q. Please explain this issue.

21 A. Liberty Midstates offers an employee benefits package including medical,
22 dental, vision, and a 401(k) retirement savings plan.

23 Q. What information did Staff review as part of its audit?

1 A. Staff reviewed plan documents for all benefits offered to Liberty Midstates’
2 employees, the Company’s general ledger, and payroll data for calendar years 2022 and 2023.

3 Q. How did Staff determine the amount of employee benefit expenses to include in
4 Liberty Midstates’ cost of service?

5 A. Staff set an ongoing level of employee benefit expenses based on actual
6 employee benefit and 401(k) match expenses incurred during the twelve months ending
7 December 31, 2023.

8 **INCENTIVE COMPENSATION**

9 Q. Please describe the incentive compensation issue as it relates to this case.

10 A. Liberty Midstates has several forms of incentive compensation. The Company
11 provides a long term incentive plan (“LTIP”), ** [REDACTED]
12 [REDACTED] ** a short-term incentive plan (“STIP”), ** [REDACTED]
13 [REDACTED] ** a shared bonus pool (“SBP”), ** [REDACTED]
14 [REDACTED] ** a variable pay plan (“VPP”) ** [REDACTED]
15 [REDACTED] **, and an employee share purchase
16 plan (“ESPP”) which is available to all employees who are eligible to receive other employee
17 benefits, such as health care. Below is a description of each program.

18 Long-Term Incentive Plan (“LTIP”)

19 Q. Please describe the Company’s Long-Term Incentive Plan.

20 A. ** [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED] **

Short-Term Incentive Plan ("STIP")

20 Q. Please describe the Company's Short-Term Incentive Plan.

21 A. ** [REDACTED]

22 [REDACTED]
23 [REDACTED]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]

12 [REDACTED] **

13 Shared Bonus Pool ("SBP")

14 Q. What is the Company's Shared Bonus Pool program?

15 A. ** [REDACTED]

16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]

1 ** [REDACTED] **
2 ** [REDACTED] **

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]

15 [REDACTED] **

16 Variable Pay Plan (“VPP”)

17 Q. Please describe the Company’s Variable Pay Plan.

18 A. ** [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]

7 [REDACTED] **

8 Employee Share Purchase Plan (“ESPP”)

9 Q. What is the Employee Share Purchase Plan?

10 A. ** [REDACTED]

11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]

18 [REDACTED] **

19 Q. What did Staff’s audit of these programs involve?

20 A. Staff met with Liberty Midstates representatives as well as reviewed current and
21 previous versions of incentive compensation plan documents corporate scorecards that are used
22 in the calculation of short-term incentive compensation expenses paid out by Liberty Midstates
23 since its prior rate case, Case No. GR-2018-0013, and the Company’s general ledger.

1 Q. What is Staff's proposed treatment of incentive compensation?

2 A. Staff has removed amounts tied to ** [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED] **

10 Q. How did Staff treat the incentive compensation paid to union employees?

11 A. It is Staff's intention to make no adjustments to union incentive compensation
12 payouts, as these are part of a collective bargaining agreement between Liberty Midstates and
13 its union employees. In fact, Staff has not adjusted payouts for VPP for the years 2020, 2021,
14 2022, or 2023. For the payouts in 2018 and 2019, Liberty's ledger entries for short-term
15 incentive compensation payouts lacked sufficient detail for Staff to determine how much of the
16 payouts for the years in question pertain to each of the incentive compensation plans. As a
17 result, Staff adjusted all of the payout amounts pertaining to those years.

18 Incentive Compensation is labor-related, and all labor-related costs include an expense
19 amount as well as an amount that is capitalized. For all equity-based amounts mentioned above
20 that are being removed by Staff, an adjustment will be made to expense accounts, but there will
21 also be a proportionate amount removed from plant and depreciation reserve. This capitalized
22 plant and reserve amounts will be removed for the period of the true-up cutoff date in

1 Case No. GR-2018-0013 (March 31, 2018), of which the rate base was stipulated and agreed
2 to, through the update period in the current rate case (December 31, 2023).

3 **PENSIONS & OTHER POST-EMPLOYMENT BENEFITS**

4 Q. Please explain this issue.

5 A. The Commission approved a Unanimous Stipulation and Agreement in Liberty
6 Midstates' prior rate case, Case No. GR-2018-0013. The revenue requirement in that case was
7 part of a black box settlement, and the Stipulation and Agreement in that case does not
8 specifically address all costs included in the revenue requirement; however, the Stipulation
9 contained language specifically addressing certain items, including pension and other
10 post-employment benefits ("OPEBs").

11 Q. Please describe Staff's audit of pensions and OPEBs.

12 A. Staff reviewed pension and OPEB contributions made in the period beginning
13 April 1, 2018, through December 31, 2023. Staff also reviewed actuarial reports and plan
14 documents pertaining to these issues, as well as Company workpapers and testimony.
15 Finally, Staff reviewed the Unanimous Stipulation and Agreement in Case No. GR-2018-0013
16 as it has specific language addressing pension and OPEB accounting treatments, the amounts
17 included in the regulatory assets, the period the asset would be amortized and when the
18 amortization would begin.

19 Q. Please describe Staff's pension adjustments.

20 A. Staff calculated the unamortized portion of the pension regulatory asset balance
21 established as part of the Unanimous Stipulation and Agreement in Liberty Midstates' prior rate
22 case, Case No. GR-2018-0013. Next, Staff calculated the amount of pension expense paid by
23 the Company during the period beginning March 31, 2018 (the true up date in the 2018 rate

1 case) through December 31, 2023, that was over and above the amount of pension expense
2 being recovered in rates. These amounts were netted together, and Staff included the new
3 pension regulatory asset balance in rate base to be amortized over a five-year period. Staff also
4 made an adjustment to include an annual amount of amortization expense pertaining to the
5 pension regulatory asset discussed above. Finally, Staff updated the ongoing pension expense
6 included in Liberty's revenue requirement to reflect the actuarial estimated 2023 net periodic
7 pension costs.

8 Q. Were there any changes to the method in which Liberty Midstates accounts for
9 pension expense?

10 A. Yes. According to Liberty Midstates witness James A. Fallert, "in regard to
11 pension expense, beginning in 2021 certain of the employees who provide services to multiple
12 Liberty entities were reclassified into a separate group termed 'Midstates2' in order to expedite
13 the appropriate allocations of the associated expenses."³ Mr. Fallert further stated that,
14 "the actuaries track and report the Midstates2 employees separately. It is simply necessary to
15 include in the adjustment both the amounts directly charged to Liberty and the portion of
16 Midstates2 employees allocated to Liberty."⁴

17 Q. Please describe Staff's adjustments for other post-employment benefits.

18 A. Staff calculated the unamortized portion of the OPEB regulatory asset balance
19 established as part of the Unanimous Stipulation and Agreement in Liberty Midstates' prior rate
20 case, Case No. GR-2018-0013. Next, Staff calculated the amount of OPEB expense paid by
21 the Company during the period beginning March 31, 2018, (the true up date in the 2018

³ James A. Fallert Direct Testimony, pg. 4, ll. 5-8

⁴ James A. Fallert Direct Testimony, pg. 4, ll. 11-13

1 rate case) through December 31, 2023, that was over and above the amount of OPEB expense
2 being recovered in rates. These amounts were netted together, and Staff included the new
3 OPEB regulatory liability balance as an offset to rate base to be amortized over a five-year
4 period. Staff also made an adjustment to include an annual amount of amortization expense
5 pertaining to the OPEB regulatory liability discussed above.

6 Q. Did Staff include an ongoing amount of OPEB expense in the Company's
7 revenue requirement in this case?

8 A. No. Staff set ongoing OPEB expense to zero.

9 Q. Please explain.

10 A. The Company recorded negative OPEB expense in 2023.⁵ Consistent with the
11 treatment outlined in Paragraph 9.G. of the Unanimous Stipulation and Agreement in
12 Case No. GR-2018-0013, OPEB expense is to be set to zero and the difference accumulated in
13 a regulatory liability account to be returned to ratepayers via a reduction once the expense
14 becomes positive again.

15 Q. Does Staff have any further comments regarding pensions and OPEBs?

16 A. Yes. First, Liberty's test year regulatory asset balance included deferred rate
17 case expenses for this case. The Company made an adjustment to remove these costs as part of
18 their rate case expense adjustments. Similarly, Staff's updated regulatory asset balance does
19 not include these costs. Second, the pension and OPEB expenses are based on actuarial
20 estimates of 2023 costs. Should updated pension and OPEB calculations become available
21 during the course of this rate case, Staff recommends replacing the estimated amounts with the
22 updated amounts.

⁵ James A. Fallert Direct Testimony, pg. 3, ll. 9

1 **RATE CASE EXPENSE**

2 Q. What is rate case expense?

3 A. Rate case expenses are the incremental costs incurred by a utility in the
4 preparation and filing of a rate case. In this instant case, Liberty Midstates has incurred costs
5 associated with the preparation of a depreciation study and costs for outside counsel.
6 Liberty Midstates has also incurred costs pertaining to expert witnesses regarding cost of
7 capital, weather normalization, rate design, pensions and OPEBs, and cash working capital.

8 Q. How did Staff approach this issue?

9 A. Staff reviewed all invoices for rate case expenses in this current case that were
10 provided by Liberty Midstates. Staff also reviewed the facts and circumstances of
11 Liberty Midstates' two prior rate cases.

12 Q. What is Staff's proposed treatment of rate case expense?

13 A. Staff recommends including a normalized level of rate case expense based on
14 rate case expenses incurred this case, subject to a 50/50 sharing mechanism. The portion of
15 rate case expense included in the revenue requirement is to be normalized over a three-year
16 period. Staff also recommends including the full cost of the depreciation study, amortized over
17 five years. Staff will assess these costs through November 26, 2024 (the date reply briefs are
18 filed with the Commission).

19 Q. What is the basis of Staff's recommendation to share rate case expenses?

20 A. Staff's recommendation to share rate case expense is based upon the following:

21 1) Rate case expense sharing creates an incentive for the utility to control rate case
22 expenses to a reasonable level,

1 2) Ratepayers and shareholders both benefit from the rate case process.
2 While ratepayers receive safe and adequate service at just and reasonable rates, shareholders
3 are afforded the opportunity to earn an adequate return on their investment;

4 3) Ratepayers will continue to pay for the majority of the rate case expenses regardless
5 of any sharing mechanism when including the internal labor costs that are not included in the
6 sharing mechanism, therefore it is fair and equitable to allocate a portion of the rate case
7 expenses to the shareholders; and

8 4) It is highly probable that some recommendations advocated by the utility through
9 the rate case process will ultimately be determined to be not in the public interest by
10 the Commission.

11 Q. Please explain why it is problematic for utilities to be allowed full recovery of
12 rate case expenses.

13 A. Allowing a utility to recover all, or almost all of its rate case expense creates an
14 inherent disincentive for the utility to control rate case expenses. For every other participant in
15 the rate case proceeding, their funds are ultimately limited by budgetary and financial
16 constraints. The ability to pass through the entire amount of expense, along with significant
17 financial resources, creates what can be viewed as an unfair advantage over the parties during
18 a rate case proceeding.

19 Q. Will the sharing of rate case expenses impact a utility's spending?

20 A. Other discretionary utility expenses are not recovered by the utility during the
21 rate setting process. Charitable contributions, which are discretionary amounts paid to
22 individuals or organizations for charitable reasons that have no direct business benefit,
23 are examples of costs that have not historically been included as an expense in the cost of service

1 calculations. While the utility may believe it has the responsibility to be a “good corporate
2 citizen,” these donations would represent an involuntary contribution by the ratepayer if they
3 were to be included in rates. Other costs that are routinely disallowed by Staff are expenses for
4 a company’s political activities (“lobbying”). Lobbying and charitable contributions represent
5 costs which are not necessary for the provision of safe and adequate service and not recovered
6 through rates. The lack of recovery of those costs has not dissuaded utilities from engaging in
7 these activities.

8 Q. What has the Commission determined regarding the sharing of rate case
9 expense?

10 A. This 50/50 sharing mechanism is consistent with the Commission’s decision
11 concerning rate case expense in the Spire Missouri Case Nos. GR-2017-0215 and
12 GR-2017-0216, which was upheld by the Missouri Supreme Court. The Commission-approved
13 Full Unanimous Stipulation in Spire’s most recent case, Case No. GR-2022-0179,
14 also addressed the 50/50 sharing mechanism. In Empire’s Case No. ER-2019-0374, the issue
15 of 50/50 rate case expense sharing went to hearing, and the Commission determined that a 50/50
16 sharing mechanism was appropriate.

17 Q. How did Staff approach its adjustment to rate case expense?

18 A. Staff examined the facts and circumstances in Liberty Midstates’ filing.

19 Staff divided rate case expense over the period of time it estimates will pass before the
20 utility’s next general rate case and included an annual amount in its revenue requirement
21 calculation. Typically, this cost is not “amortized” for ratemaking purposes, and the utility’s
22 recovery of this expense in rates is not tracked against its actual rate case expense for
23 consideration for over or under recovery. Staff recommends this cost be “normalized” by

1 including an annual level in the cost of service. In the current case, Staff recommends a
2 three-year normalization of rate case expense.

3 Staff also included the full cost of the depreciation study, amortized over a five-year
4 period as the Commission requires a depreciation study be submitted every five years.

5 Q. Does Staff have any further comments regarding rate case expense?

6 A. Yes. Liberty Midstates will incur costs pertaining to customer notices in this
7 case. Once the invoices for customer notices are provided to Staff, Staff will update its
8 adjustments for rate case expenses to include the full cost, amortized over three years.

9 **PROPERTY TAXES AND TRACKER**

10 Q. Please explain this issue.

11 A. Property taxes are annual charges levied by a local government and paid by the
12 owners of real estate within its jurisdiction. Taxes are assessed on property owned on the 1st
13 day of January of each tax year. The value of the property is determined by an assessor using
14 standardized information, and this determination is the basis for the amount of taxes assessed
15 for that year. Assessments are generally issued in April, and are due by December 31st of the
16 same year.

17 Q. What did Staff's audit of this issue involve?

18 A. Staff reviewed Liberty Midstates' general ledger and property tax invoices for
19 the period beginning April 1, 2018, through the December 31, 2023, update period in this case.
20 Staff also examined actual amounts paid for 2022 and 2023 Missouri property taxes.

21 Q. What is Staff's recommended treatment of property taxes in this case?

22 A. Staff recommends including an annualized level of property taxes in
23 Liberty Midstates' revenue requirement based on the amount of property taxes assessed on

1 Liberty Midstates' property owned on January 1, 2023, and paid in December 2023 in the
2 amount of \$2,008,326. This amount will used as the base amount to track future property taxes
3 consistent with the property tax tracker established by the Missouri General Assembly.⁶

4 **ENERGY EFFICIENCY REGULATORY ASSET AND RATE BASE**

5 Q. Please describe this issue.

6 A. Liberty Midstates' Energy Conservation and Efficiency Program
7 ("EE Program") is designed to promote energy conservation, efficiency, and education for
8 Liberty Midstates' customers. Funding for the EE Program is \$150,000 per year which is
9 collected in base rates, \$105,000 of which is annually dedicated to the Residential Low-Income
10 Weatherization Assistance Program ("LIWAP"). LIWAP is designed to provide energy
11 education and weatherization assistance to low-income, residential customers to assist
12 customers in reducing their energy consumption and thus reduce their natural gas utility bills.
13 The remaining \$45,000 of EE funding is designated for non-weatherization EE programs such
14 as appliance rebates and education. Liberty Midstates also offers a low-income affordability
15 program ("LIAP") which provides bill credits to eligible customers. This program was created
16 as part of the Unanimous Stipulation and Agreement in Case No. GR-2018-0013, and its
17 funding is separate from the EE programs already established. Annual LIAP funding included
18 in rates amounts to \$36,300 annually. EE and LIAP costs are tracked and any expenditures
19 made by the Company on EE programs in excess of or less than the amounts already included
20 in rates is deferred to a regulatory asset or liability, as appropriate, and included in rate base in
21 the Company's next general rate case proceeding. Such deferred amounts shall be included in

⁶ Section 393.400, RSMo.

1 rate base and amortized over a six-year period. The treatment for LIAP costs is similar to that
2 of EE costs with the exception that unspent LIAP costs are not returned to ratepayers.

3 Q. What did Staff's audit of this issue involve?

4 A. Staff reviewed invoices for EE spending for the period beginning
5 March 31, 2018 (the true up date in the 2018 rate case) through December 31, 2023,
6 Liberty Midstates' current tariff (YG-2021-0025, effective October 16, 2020), the Unanimous
7 Stipulation and Agreement approved by the Commission in Case No. GR-2018-0013 and the
8 Company's general ledger.

9 Q. Please describe Staff's adjustments for EE Program costs.

10 A. Staff has included an energy efficiency regulatory asset balance in rate base.
11 The balance in this regulatory asset reflects the unamortized portion of the EE regulatory asset
12 created in Case No. GR-2018-0013 and all eligible energy efficiency spending that has occurred
13 between the March 31, 2018, cut-off date in the prior rate case through the December 31, 2023,
14 update period in the current case that is above and beyond what is already being recovered in
15 rates. Staff reviewed the amount of bill credits issued as part of the LIAP program and
16 determined that the bill credits for any year did not exceed the annual allowance included in
17 rates. Therefore, the EE regulatory asset in this case does not reflect any costs pertaining to
18 LIAP⁷. In addition to the energy efficiency regulatory asset balance included in rate base,
19 Staff also included an amount of amortization expense in rates to reflect a six-year amortization
20 period. Staff's proposed treatment for this regulatory asset balance is consistent with the terms

⁷ Per the terms of the Unanimous Stipulation & Agreement in Case No. GR-2018-0013, Liberty Midstates created a Red Tag Repair program. This program is part of the Company's EE Program and shares the same funding. According to the Company, Liberty Midstates is only performing functions that do not require purchasing replacement items. Therefore no program costs have been included in the EE regulatory asset created in this rate case.

Direct Testimony of
Jane C. Dhority

1 of the Unanimous Stipulation and Agreement in Liberty Midstates' prior rate case,
2 Case No. GR-2018-0013. It is also consistent with the accounting treatment that was described
3 in the Revised Partial Stipulation and Agreement As to Certain Issues in Liberty Midstates'
4 prior rate case, Case No. GR-2014-0152.

5 Q. Does this conclude your direct testimony?

6 A. Yes it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Request of Liberty)
Utilities (Midstates Natural Gas) Corp.) Case No. GR-2024-0106
d/b/a Liberty to Implement a General Rate)
Increase for Natural Gas Service in the)
Missouri Service Areas of the Company)

AFFIDAVIT OF JANE C. DHORITY

STATE OF MISSOURI)
CITY OF St. Louis) ss.

COMES NOW JANE C. DHORITY and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Direct Testimony of Jane C. DhORITY*; and that the same is true and correct according to her best knowledge and belief.

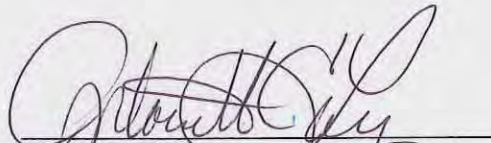
Further the Affiant sayeth not.



JANE C. DHORITY

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the City of St. Louis, State of Missouri, at my office in St. Louis, MO, on this 16th day of July 2024.



Notary Public



Jane C. Dhority

Present Position:

I am a Senior Utility Regulatory Auditor, Auditing Department, Financial & Business Analysis Division of the Missouri Public Service Commission. As a Senior Utility Regulatory Auditor, I assist in research and analysis of the financial aspects of public utility operations.

Educational Credentials and Work Experience:

I received a Bachelor of Science in Accounting from the University of Missouri – St. Louis in December 2018, and I have been employed by the Missouri Public Service Commission since April 2019.

Past Rate Case Proceedings:

<u>Company Name</u>	<u>Case No.</u>	<u>Issue(s)</u>
Ameren UE (ELEC)	EA-2023-0286	Inflation Reduction Act, Tax Credits, Tax Credit Adders, Solar Project Qualifications, RESRAM & IRA Tracker, Solar Project Tax Strategies, Recommendations
Confluence Rivers UOC (WATER)	WR-2023-0006	Website Expense, Line Locating Costs, Billing Software Expense, Call Center Contract Costs, External Audit & Accounting Fees, Legal Expense, PSC Assessment, Rate Case Expense, Cash Working Capital Lead/Lag Study, Miscellaneous Expense, Lab Testing Fees
Ameren UE (ELEC)	EA-2022-0245	PISA, Recordkeeping Issues, Revenue Tracker
Spire Missouri Inc. (GAS)	GR-2022-0179	Payroll, Payroll Taxes, Overtime, Employee Benefits, Pensions & OPEBs, SERP, Rate Case Expense, External Audit/Overhead Study Fees
Liberty MNG (GAS)	GT-2022-0118	ISRS Filing

<u>Company Name</u>	<u>Case No.</u>	<u>Issue(s)</u>
Ameren UE (GAS)	GR-2021-0241	Advertising, Promotional Giveaways, Rents & Leases, Lobbying, Dues & Donations, Miscellaneous Expense, Expense Reports, Capitalized O&M Depreciation, Cash Working Capital, Board of Directors Fees, Customer Convenience Fees
Ameren UE (ELEC)	ER-2021-0240	Advertising, Promotional Giveaways, Rents & Leases, Lobbying, Dues & Donations, Miscellaneous Expense, Expense Reports, Capitalized O&M Depreciation, Cash Working Capital, Board of Directors Fees, Customer Convenience Fees
Ameren UE (ELEC)	ER-2019-0335	Plant in Service, Depreciation Reserve, Other Rate Base Items, Interest on Customer Deposits, Capitalized O&M Depreciation, PSC Assessment, Advertising
Ameren UE (ELEC)	EO-2019-0391	Asset Sale