

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

In the Matter of Union Electric Company)	
d/b/a Ameren Missouri's Request for)	
Deferral and Authorization Authority)	Case No. EU-2020-0114
Relating to Certain Callaway Energy)	
Center Operation and Maintenance)	
Expenses		

**THE MISSOURI INDUSTRIAL ENERGY CONSUMERS', OFFICE OF PUBLIC
COUNSEL'S, AND MIDWEST ENERGY CONSUMERS GROUP'S JOINT
MOTION FOR A PREHEARING CONFERENCE**

Comes now the Missouri Industrial Energy Consumers ("MIEC"), Office of Public Counsel ("OPC"), and Midwest Energy Consumers Group ("MECG"), (hereafter collectively referred to as the "Joint Movants") and, pursuant to 4 CSR 240-2.090(4) file their motion for a prehearing conference. In support of its motion, the Joint Movants state as follows:

1. On October 28, 2019, The Union Electric Company d/b/a Ameren Missouri ("Ameren") filed an application for an Accounting Authority Order ("AAO") that would allow it to defer certain Callaway Energy Center refueling outage costs to Federal Energy Regulatory Commission Account No. 174 in the Uniform System of Accounts and to amortize those costs.

2. On October 29, the Commission issued an *Amended Order Directing Notice, Setting Intervention Deadline and Directing Staff Recommendation*. In that order, the Commission set an intervention deadline of November 26, and ordered a Staff Recommendation to be filed on December 27.

3. The MIEC filed an application to intervene on November 4, which was granted by the Commission on November 14. An application to intervene was filed by the Midwest Energy Consumers Group on November 13, which was granted on November 26.

4. While the Commission's October 29 *Amended Order Directing Notice, Setting Intervention Deadline and Directing Staff Recommendation* contemplates that this matter may be resolved by the filing of a Staff Recommendation and without an evidentiary hearing, it is not clear that that is the best way to resolve the issues raised by the request for an AAO. The deferral accounting, if the Commission grants the requested AAO, must dovetail with the ratemaking treatment afforded to Callaway refueling expenses in the pending general rate case (ER-2019-0335). The current ratemaking treatment, in which historical refueling expenses are normalized and annualized for inclusion in rates, is very different from the treatment those expenses would receive if the requested AAO is granted. In order to ensure that neither customers are overcharged for refueling costs nor Ameren under-recovers those costs, this case should be resolved concurrently with the rate case, and the treatment of refueling costs should be coordinated between the two cases so that neither Ameren nor its customers are harmed by any change in accounting treatment.

5. The Joint Movants request that a prehearing conference be set in the near future to allow the parties to discuss the issues raised by Ameren's request for an AAO and whether an evidentiary hearing is necessary to address those issues, and if so, to discuss a proposed procedural schedule that would provide for a resolution of this case by the operation of law date in the rate case (May 30, 2020).

WHEREFORE, the Joint Movants respectfully request that the Commission set a prehearing conference.

Respectfully submitted,

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ENERGY CONSUMERS GROUP**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 27th day of November, 2019, to all parties on the Commission's service list in this case.

/s/ *Lewis Mills*