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MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. GR-2024-0369

DIRECT TESTIMONY

OF

JOSEPH S. WEISS

ON

BEHALF OF

UNION ELECTRIC COMPANY

D/B/A AMEREN MISSOURI

**St. Louis, Missouri
September, 2024**

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1 **DIRECT TESTIMONY**

2 **OF**

3 **JOSEPH S. WEISS**

4
5 **I. INTRODUCTION**

6 **Q. Please state your name and business address.**

7 A. My name is Joseph S. Weiss. I am an Assistant Vice President with Concentric Energy
8 Advisors, Inc. ("Concentric"). My business address is 293 Boston Post Road, Suite 500,
9 Marlborough, Massachusetts 01752.

10 **Q. On whose behalf are you submitting this testimony?**

11 A. I am testifying on behalf of Union Electric Company d/b/a Ameren Missouri ("Ameren
12 Missouri" or the "Company").

13 **Q. Please describe your educational background and professional experience in the**
14 **energy and utility industries.**

15 A. I have over 18 years of direct experience in the public utility industry primarily as a
16 consultant. I have provided support for filings with several utility commissions and filed
17 testimony as an expert witness before the Corporation Commission of Oklahoma, the
18 Illinois Commerce Commission, the Maine Public Utilities Commission, and the Public
19 Utilities Commission of Ohio. I have also previously appeared before the Missouri Public
20 Service Commission (the "Commission") as an expert witness on cash working capital. I
21 have an M.B.A. from Southern Illinois University Edwardsville and a B.S. in Business
22 Administration with a major in Accounting and Finance from Saint Louis University. My

1 curriculum vitae, as well as a listing of my prior testimonies is provided in Schedule JSW-
2 D1.

3 **Q. Please describe Concentric's activities in energy and utility engagements.**

4 A. Concentric provides financial, regulatory and economic advisory services to many energy
5 and utility clients across North America. Our regulatory, economic, and market analysis
6 services include utility ratemaking and regulatory advisory services, energy market
7 assessments, market entry and exit analysis, corporate and business unit strategy
8 development, demand forecasting, resource planning, and energy contract negotiations.
9 Our financial advisory activities include both buy and sell side merger, acquisition and
10 divestiture assignments, due diligence and valuation assignments, project and corporate
11 finance services, and transaction support services. In addition, Concentric provides
12 litigation support services on a wide range of financial and economic issues on behalf of
13 clients throughout North America.

14 **II. PURPOSE OF TESTIMONY**

15 **Q. What is the purpose of your direct testimony?**

16 A. The purpose of my direct testimony is to provide my assessment and recommendation
17 pertaining to the reasonableness of Ameren Service Company's ("AMS") services and
18 associated costs billed to Ameren Missouri.

1 **IV. SERVICES PROVIDED BY AMS TO AMEREN MISSOURI**

2 **Q. Please describe AMS.**

3 A. AMS is a service company that was originally formed to take advantage of synergies
4 gained by eliminating redundant functions at both Ameren Missouri and CIPS subsequent
5 to their merger that could more cost-effectively be combined into one service company.

6 **Q. Was the formation of the service company required by law?**

7 A. Yes. The Public Utility Holding Company Act of 1935 (“PUHCA”) directed the United
8 States Securities and Exchange Commission (“SEC”) to flatten the corporate structure of
9 utilities to remove unnecessary corporate layers. Individual operating utility companies
10 were required to centralize certain business operations into central service companies, but
11 all service companies would be subject to SEC and Federal Power Commission regulation.
12 In 1977, the Federal Power Commission was replaced by the FERC.

13 At the time of Ameren’s formation, PUHCA required the utilization of such a
14 service company and required that services be provided at cost. As a result, when a state
15 utility commission regulated a utility in a particular state, the ratepayers of that state would
16 pay only the share of any common service company expenses associated with that state’s
17 electric company allocated to it under SEC-approved formulas to prevent a holding
18 company from double recovering its expenses when it operates in more than one state and
19 to ensure each state paid its fair share of costs.

20 Although PUHCA has now been largely repealed, some functions formerly
21 assigned to the SEC under PUHCA were transferred to the FERC at the time of the PUHCA

1 repeal by Congress' adoption of the Energy Policy Act of 2005. FERC regulations adopted
2 under that Act continue to require the use of cost-based pricing for service companies.¹

3 **Q. Did the Missouri PSC approve the merger of Union Electric and CIPS, as well as the**
4 **formation of AMS?**

5 A. Yes. In Case No. EM-96-149, the Missouri Commission approved the merger of Ameren
6 Missouri (then doing business as Union Electric) and CIPS that resulted in the formation
7 of AMS. The Commission's order stated:

8 In addition, the Commission finds the proposed merger transaction,
9 as reflected in the contractual agreement contained as a part of the
10 Union Electric Company filing of November 7, 1995, and subject to
11 the conditions and modifications as set out in the above Stipulation
12 and Agreement, is not detrimental to the public interest.

13 The Stipulation and Agreement approved by the order specifically referenced the
14 General Services Agreement ("GSA") under which AMS agreed to provide Ameren
15 Missouri corporate support services at cost. The Stipulation states that a "Utility Service
16 Company" will "provide administrative and general or operating services to UE and [its
17 affiliates]" and defines "Service Agreement" as the GSA between AMS and its affiliates.
18 That GSA was part of the record before the Commission in the merger case. While the
19 Commission did not explicitly use the words "we hereby approve the formation of AMS,"
20 the Commission approved the merger that created the corporate structure that included

¹ 18 CFR § 35.44 – Protections against affiliate cross-subsidization. Section (b)(3) of the rule states: "A franchised public utility that has captive customers or that owns or provides transmission service over jurisdictional transmission facilities, may only purchase or receive non-power goods and services from a centralized service company at cost." Although this testimony pertains to Ameren Missouri's natural gas business, that business is operated as a division of Ameren Missouri which, by virtue of its electric utility operations, is subject to the foregoing rule, including regarding the services it receives from AMS, the majority of which support both its electric and gas operations.

1 AMS and AMS's provision of services to Ameren Missouri and the other affiliates, and
2 clearly understood that AMS would provide services under the GSA at cost.

3 **Q. What services does AMS provide to Ameren Missouri?**

4 A. AMS provides administrative support services. AMS' services include typical corporate
5 functions such as accounting, legal, building management, information technology, etc.
6 The preponderance of transactions from AMS to Ameren Missouri pertain to corporate
7 shared services provided by AMS.

8 **Q. How does Ameren Missouri determine both the services to procure from AMS, and**
9 **the extent of the services it will receive from AMS?**

10 A. As discussed in the direct testimony of Ameren Missouri witness Laura M. Moore, Ameren
11 Missouri and AMS follow, on an ongoing basis, a Joint Planning and Procurement process
12 and a Demand Planning process. These processes, which are followed in concert with the
13 other, are used during each budget cycle and include ongoing reviews of AMS services and
14 spend as each budget year progresses. Under those processes, Ameren Missouri determines
15 its need for various services, the value of those services, and the level of the services it will
16 receive from AMS.

17 **Q. Does Ameren Missouri also have the option to self-provide or use a third-party to**
18 **provide some or all of these services?**

19 A. Yes, except for those services that necessarily arise from AMC's status as a publicly traded
20 company that owns 100% of Ameren Missouri's stock, Ameren Missouri has the option to
21 self-provide a service, utilize the service of a non-affiliated service provider, or retain AMS
22 to provide defined services.

1 **Q. Are the services provided by AMS to Ameren Missouri necessary and appropriate?**

2 A. Yes. The services that Ameren Missouri receives from AMS are both necessary and
3 appropriate. The manner in which the services are provided to Ameren Missouri by AMS
4 is consistent with how numerous other regulated utility companies obtain such services.

5 **Q. Are the services provided by AMS to Ameren Missouri covered by a Cost Allocation**
6 **Manual (“CAM”)?**

7 A. Yes. The manner by which AMS’ services are provided and charged to Ameren Missouri
8 is set forth in the GSA, which is also included as an appendix in the CAM. Among other
9 things, the GSA or the CAM:

- 10 • Requires the services be provided at cost;
- 11 • Codifies recordkeeping and access to records requirements, including documentation
12 of affiliate transactions, and the continued provision of detailed affiliate transaction
13 reporting for all products and services provided by AMS (and other affiliates), not
14 just to Ameren Missouri, but to all AMC affiliates;
- 15 • Codifies certain detailed reporting requirements;
- 16 • Requires that all affiliate transactions be conducted under a written contract between
17 Ameren Missouri and AMS; and
- 18 • Requires the formation and implementation of an Ameren Missouri CAM Team to
19 aid in Ameren Missouri’s compliance with the Affiliate Transactions Rules.

1 **Q. Are the services provided by AMS to Ameren Missouri the same as those which**
2 **AMS provides to Ameren Illinois?**

3 A. Yes. The services provided by AMS to Ameren Missouri and Ameren Illinois are
4 essentially the same.

5 **Q. Are service companies, such as AMS, common in the energy industry?**

6 A. Yes. As a result of industry mergers and acquisitions, many stand-alone, single
7 jurisdictional energy companies have merged or been acquired. In an effort to increase
8 efficiencies, ensure consistent practices throughout the organization, and reduce costs, the
9 post-merger integration of common functions at an affiliated service company has been a
10 common trend throughout the United States. Service companies similar to AMS file Form
11 60 annual reports with the FERC. The Form 60 report is an annual regulatory support
12 requirement under 18 CFR 369.1 for centralized service companies. The report is designed
13 to collect financial information from centralized service companies subject to the
14 jurisdiction of the FERC.

15 **Q. Have you prepared a Schedule identifying the service companies which filed a Form**
16 **60 annual report, and the affiliated companies to which the service companies**
17 **provided services, and the services provided?**

18 A. Yes, I have included this information in Schedule JSW-D2.

19 **Q. Please describe what Schedule JSW-D2 shows.**

20 A. Schedule JSW-D2 identifies the service companies and affiliated companies to which
21 services are provided, as well as the services provided to the affiliated companies.
22 Schedule JSW-D2 shows that 34 utility service companies filed FERC Form 60 annual

1 reports for calendar year 2023.² Reviewing these reports, the service companies provided
2 services to 667 affiliated companies, including many regulated utilities.

3 **Q. Based upon your review of the scope of services offered by AMS to Ameren**
4 **Missouri, are the services provided consistent with those of other service companies**
5 **in the energy industry?**

6 A. Yes. In my experience, the services provided by AMS to Ameren Missouri are consistent
7 with those provided by other service companies to affiliated regulated utilities. Schedule
8 JSW-D2 further supports my experience and conclusion.

9 **Q. Based upon your experience, is the use of the shared services model prevalent today**
10 **in the energy industry?**

11 A. Yes. Based upon both my personal knowledge of the energy industry, as well as the number
12 of Form 60 reports filed with the FERC, service companies continue to be widely used
13 throughout the energy industry in the United States.

14 **Q. To what do you attribute the extensive use of service companies?**

15 A. Beyond the fact that the PUHCA required the use of service companies, many of the
16 mergers that have been consummated in the energy industry have been premised, in part,
17 upon the realization that the combined companies could produce savings from the
18 elimination of duplication in public company/"back room" functions, and many non-
19 customer-facing corporate functions. There are economies of scale that can be achieved by
20 eliminating duplicative roles and functions when two companies merge (e.g., one

² Schedule JSW-D2 represents the service companies that filed the FERC Form 60 for 2023, but presents data from the 2022 filing.

1 accounting, human resources, information technology, procurement, etc. function).
2 Further, the merged companies would most likely be able to perform required tasks with
3 fewer staff than the individual operating companies were able to achieve. This approach
4 benefits the holding company (here AMC) and the customers of its operating utilities
5 (including Ameren Missouri) alike because between rate reviews the lower overall costs
6 the service company delivers inures to the benefit of shareholders and ultimately to the
7 benefit of customers in the form of lower cost of service and rates.

8 V. COST OF AMS' SERVICE

9 **Q. Does AMS direct charge for its services when the service is only to one affiliate?**

10 A. Yes, it does.

11 **Q. When the direct assignment of costs is not possible, are AMS' services provided to**
12 **Ameren Missouri and its other affiliated companies at the fully distributed cost of**
13 **providing those services?**

14 A. Yes, they are (and that is true for directly charged services as well). All costs incurred by
15 AMS are either directly charged (when the cost applies only to one affiliate) or allocated
16 using a service request system, but regardless of how the cost of the services are charged,
17 they are always priced at AMS's fully distributed cost with no mark-up or profit
18 component.

19 **Q. How does the Commission's affiliate transaction rule, 20 CSR 4240-20.015, define**
20 **"fully distributed cost" or "FDC"?**

21 A. Section (1)(F) of the Rule defines fully distributed cost as "a methodology that examines
22 all costs of an enterprise in relation to all the goods and services that are produced. FDC

1 requires recognition of all costs incurred directly or indirectly used to produce a good or
2 service. Costs are assigned either through a direct or allocated approach. Costs that cannot
3 be directly assigned or indirectly allocated (e.g., general and administrative) must also be
4 included in the FDC calculation through a general allocation.”

5 **Q. Does Ameren Services Company profit from the services provided to its affiliated**
6 **companies?**

7 A. No. All AMS charges reflect the direct cost of providing that service or product. There is
8 no profit margin built into the charges, and AMS operates on a zero-profit basis.

9 **Q. Are the costs of AMS’s services the same as if Ameren Missouri were to self-provide**
10 **the services?**

11 A. The services are, at worst, the same as if Ameren Missouri were to self-provide the services.
12 It is more likely, however, that due to the economies of scale realized by centralizing the
13 shared services at AMS, the services are provided at a cost lower than if Ameren Missouri
14 were to self-provide the services on a stand-alone basis.

15 **Q. Please explain.**

16 A. There are inherent efficiencies realized by consolidating common functions at one
17 company, as opposed to requiring each operating company to individually perform each
18 service. Given that AMS provides similar services to Ameren Missouri, AIC, and other
19 affiliated companies, AMS is likely able to perform the required services with fewer
20 personnel, and thus at a lower cost, than if each AMC subsidiary were to be individually
21 fully staffed to provide all services. In other words, there are economies of scale realized
22 by consolidating similar functions across the AMC companies.

1 **Q. Based upon your review of the manner by which AMS charges Ameren Missouri for**
2 **its services, can you conclude that AMS's costs are market based?**

3 A. Yes. AMS is a large scale, efficient organization which provides services at cost, without
4 mark-up or profit, where the costs consist primarily of the wages, salaries and benefits of
5 AMS employees. The wages, salaries and benefits AMS pays and provides are market
6 based. Therefore, it is reasonable to conclude that AMS's costs are market based.

7 **Q. Please explain.**

8 A. The cost of goods and services provided by AMS to its affiliated companies consists of
9 two primary cost components – (1) wages and benefits of AMS employees and (2) goods
10 and materials.

11 With regard to wages and benefits, employees of AMC subsidiaries receive market-
12 based wages and benefits. To ensure that the employees are provided a reasonable
13 compensation package, the AMS Human Resources Department routinely benchmarks
14 total compensation packages (i.e., wages and benefits) against local, regional and national
15 companies. Its goal is to provide a total compensation package that represents the median
16 of the market (i.e., 50th percentile). Therefore, the total cost of Ameren Missouri's and
17 AMS' total wages and benefits are reflective of the market. Ameren Missouri witness
18 Kelly Hasenfratz discussed how the Company establishes market-based total compensation
19 and benefits in her direct testimony filed in File No. ER-2019-0335 and I have confirmed
20 with the Company that the testimony in that proceeding continues to accurately reflect
21 Ameren's market-based approach to total compensation.

1 Further, AMS provides its goods and services to Ameren Missouri at cost (i.e.,
2 without mark-up or profit). All other non-affiliated service providers' services would
3 include a mark-up and/or profit component in the pricing of their goods and services.

4 In addition, AMS' procurement of labor and other goods and services at market
5 prices and its subsequent charging for its services at cost means that the cost of goods and
6 services provided to Ameren Missouri by AMS can reasonably be concluded to be both
7 priced at or below market and priced at cost. This is because the wages and benefits paid
8 to all employees of the Ameren companies are benchmarked at the 50th percentile of
9 market and, similarly, AMS uses procurement procedures and policies for non-employee-
10 related costs also designed to ensure that good and services are obtained at market prices.

11 **Q. What additional steps has Ameren Missouri taken to ensure the reasonableness of**
12 **the cost of services provided to it by AMS?**

13 A. Ameren Missouri has formed a CAM team and meets extensive reporting and
14 recordkeeping requirements, going well beyond existing legislative and regulatory
15 requirements, to continually oversee the dealings between AMS and Ameren Missouri. In
16 my experience, Ameren Missouri is going beyond typical practices in overseeing such
17 dealings including by use of a dedicated team to oversee CAM compliance, as well as with
18 its reporting activities to monitor and enforce compliance with the requirements set forth
19 in the CAM.

1 **Q. Do you believe that Ameren Missouri would be able to procure the services**
2 **provided by AMS from an unaffiliated company at a lower cost?**

3 A. No. AMS follows well-established and well-designed procurement policies and procedures
4 that provide for solicitation of competitive bids when appropriate so that it is obtaining
5 qualified service providers and other goods it needs to provide its services at reasonable,
6 market-based prices. Given that AMS provides its services to Ameren Missouri at cost, and
7 that it benchmarks its wages, salaries and benefits to the market, I do not believe that
8 Ameren Missouri could procure its services at a lower cost from a non-affiliated service
9 provider.

10 **Q. Are there examples of services that AMS has outsourced, on behalf of Ameren**
11 **Missouri, to a non-affiliated service provider?**

12 A. Yes. Examples of services outsourced by AMS, on behalf of Ameren Missouri, include
13 lock box services, administrative work involving buying, selling, registering shares of
14 Ameren stock, printing and distribution of customer bills, certain vegetation management
15 services, and janitorial services. AMS also uses outside services and suppliers in some
16 instances as it provides its services to the affiliates when specialized knowledge or
17 expertise is needed, or to supplement AMS employee resources when appropriate.

18 **Q. Are there Missouri legal requirements that govern a utility's transactions with**
19 **affiliated companies?**

20 A. Yes, 20 CSR 4240-20.015 and 20 CSR 4240-40.015 set out the Commission's rules for
21 affiliated transactions for electric and gas utilities, respectively. Ameren Missouri is both
22 an electric and gas utility, and the Company's CAM applies to both electric and gas utility

1 affiliate transactions. The rules are intended to prevent regulated utilities from subsidizing
2 their nonregulated operations. Put another way and as I discuss below, the regulations are
3 designed to prevent unfair preferential treatment of affiliates to the detriment of the
4 Company's customers. In order to accomplish this objective, the rule sets forth financial
5 and evidentiary standards and recordkeeping requirements applicable to any Commission-
6 regulated electrical corporation whenever such corporation participates in transactions with
7 any affiliated entity (except with regard to HVAC services as defined in section 386.754,
8 RSMo.). The rule and its effective enforcement are intended to provide the public with the
9 assurance that their rates are not adversely impacted by the utilities' nonregulated activities.

10 **Q. Has the Commission described the intent of the affiliate transaction rules in prior**
11 **orders?**

12 A. Yes, on at least two occasions. In its July 1, 2008 Report and Order in File No. EM-2007-
13 0374, the Commission granted Greater Missouri Operations ("GMO") and KCP&L a
14 variance to the Affiliate Transactions Rule for all transactions between GMO and KCP&L,
15 except for wholesale power transactions, which would be based on rates approved by the
16 FERC. At page 264, of the Commission's Report and Order, it noted that "the purpose of
17 the Commission's Affiliate Transactions Rule is to prevent cross-subsidization of regulated
18 utility's non-regulated operations, not to prevent transactions at cost between two regulated
19 affiliates." In 2018 when the Commission approved the merger of Great Plains Energy
20 (KCP&L's and GMO's parent) and Westar Energy, it essentially extended that variance to

1 Westar Energy, KCP&L and GMO's affiliated utility in Kansas operating under the
2 supervision of the Kansas Corporation Commission.³

3 **Q. Is it possible that by centralizing the shared services Ameren Missouri could**
4 **potentially be subsidizing non-regulated affiliates?**

5 A. No. First, AMC has no material non-regulated operations. Second, as previously
6 mentioned, AMS' services are provided at cost, which is determined by prevailing
7 wages/benefits and actual incurred expenses. Therefore, there is no issue of potential
8 subsidies from ratepayers to unregulated affiliates. The pricing of affiliated services only
9 has a material effect on which jurisdiction's customers are responsible for, and benefit
10 from, the cost of providing a service. Essentially, all costs are attributable to one set of
11 regulated customers or the other (i.e., Ameren Missouri versus AIC versus ATXI). Put
12 another way, the cost standard for affiliate transactions is appropriate because the question
13 being addressed is what costs (which are in any event consistent with the market) should
14 be included in the rates for each set of customers in the AMC utility family.

15 **Q. Are AMS' costs billed to affiliated companies subject to regulatory review other**
16 **than by the Missouri Commission?**

17 A. Yes. AMS' costs billed to its affiliated FERC rate regulated subsidiaries have been, and
18 continue to be, reviewed by the FERC. The FERC audit staff has not found any significant

³ File No. EM-2018-0012. While these decisions were made under the electric Affiliate Transaction Rule, the Affiliate Transaction Rule applicable to gas utilities is, in all respects pertinent to my testimony, identical to the electric rule as would be the Commission's reasoning in this merger case and in the earlier 2007 GMO case.

1 deficiencies in its most recent audit and the FERC has never disallowed any of AMS'
2 charges to the Company's transmission customers.⁴

3 The Illinois Commerce Commission ("ICC") also reviews AMS' charges to AIC
4 during rate proceedings. The ICC has accepted AMS' charges, as well as the allocation
5 methodology, which reflects fully distributed cost.

6 **Q. What do AMS' costs consist of?**

7 A. AMS costs consist of non-fuel operations and maintenance ("O&M") costs, with more than
8 99% of those O&M costs consisting of administrative and general ("A&G") costs, and the
9 cost of other services that under accounting rules are not considered O&M but are instead
10 capitalized on the receiving affiliates' books.

11 **Q. In your opinion, would a reasonable manager, in possession of and with regard for
12 the relevant facts, select AMS to provide these services?**

13 A. Yes. In reaching that conclusion, the facts that would influence the decision maker are:
14 • AMS has provided these services every year for over 25 years and is uniquely qualified
15 to provide continuity of accounting, human resources, legal, payroll, information
16 technology and other services that if Ameren Missouri were a standalone company,
17 Ameren Missouri would have to provide for/or obtain for itself;

⁴ The audit in Docket No. FA10-3-000 identified two immaterial AMS accounting items affecting the Company's tariff billings. The costs disallowed were for lobbying and charitable contributions recorded to O&M accounts that should have been recorded to account 426.1, a below-the-line accounts, which is not an includible account in the Midwest ISO Attachment O template. The audit in Docket No. FA20-6-000 found nine areas of noncompliance. The Company did not contest Staff's proposed findings in the Draft Report and agreed to implement the recommendations contained therein. Ameren submitted an implementation plan with the Division of Audits and Accounting. None of the findings involved improper AMS charges and the resulting accounting adjustments for Ameren Missouri were less than \$500,000.

1 included within the revenue requirement were booked to administrative and general
2 expenses.

3 **Q. Please explain the analysis.**

4 A. Starting with data from 1990, the reported A&G expense levels were collected as reported
5 in FERC Form 1s. As previously mentioned, UE & CIPS merged in 1997. From that point
6 forward, the historical actual expense levels were escalated using the gross domestic
7 product implicit price deflator for each year through 2023.

8 The same analysis was performed for the acquisition of CILCO in 2003 and Illinois
9 Power in 2004.

10 As shown in Schedule JSW-D3, the A&G cost levels for the merged companies are
11 consistently lower than the sum of the individual stand-alone operating companies'
12 escalated A&G expense levels. This indicates that the merged companies' costs, including
13 AMS' allocated costs, are lower than they would likely have been absent the mergers.

14 **Q. Have you also performed an assessment of Ameren Missouri's costs compared to
15 those of similar utilities?**

16 A. Yes. I compared Ameren Missouri's total gas distribution operations and maintenance
17 ("O&M") expense and gas administrative and general ("A&G") expense against a peer
18 group consisting of National LDCs with 100,000 to 250,000 customers.

19 **Q. Why was the customer count range for the peer companies set at 100,000 to 250,000
20 customers?**

21 A. Ameren Missouri operates a relatively small gas company with approximately 135,000
22 customers. For benchmarking results to be meaningful, it is important to select peer

1 companies with similar operating characteristics. Gas companies significantly smaller than
2 Ameren Missouri's gas operations may skew the results of the analysis in Ameren
3 Missouri's favor. Conversely, comparing Ameren Missouri's gas operations to materially
4 larger gas companies would produce an inappropriate benchmark for gas operations of
5 Ameren Missouri's size. Given Ameren Missouri's LDC size, if anything, comparing it to
6 LDCs that are twice as large creates a more challenging comparison.

7 **Q. What years did the benchmarking analyses review?**

8 A. The six most recent years for which data were available (i.e., 2018-2023) were used to
9 perform the analyses, although the data are less reliable in 2023 because of data
10 unavailability.

11 **Q. What was the source of the data used to perform the benchmarking analyses?**

12 A. The analyses utilized data obtained from the S&P Global Market Intelligence platform.
13 The source of the data was the annual FERC Form 2 filings made by LDC gas utilities.

14 **Q. Did you make any adjustments to the source data?**

15 A. No.

16 **Q. How did you normalize the benchmarking analyses to account for differences in the
17 size of the utilities?**

18 A. To normalize issues related to the size of the companies in the comparison, all costs were
19 evaluated on a per customer basis⁵.

⁵ Total natural gas customers for 2023 is not currently available on S&P, so for the analysis total natural gas customers for 2022 was also used for 2023.

1 **Q. How did Ameren Missouri compare to its peers when reviewing total distribution**
2 **O&M cost per customer of the national LDC gas utilities peer group?**

3 A. As shown on Schedule JSW-D4, Ameren Missouri has had an expense level near the
4 national average for distribution O&M costs. That is consistent with AMS's objective of
5 benchmarking its labor costs at the 50th percentile, which would put it at the industry
6 average.

7 **Q. How did Ameren Missouri compare to its peers when reviewing just the A&G**
8 **portion of these O&M expenses on a per customer basis?**

9 A. As shown on Schedule JSW-D5, Ameren Missouri's A&G expense per customer has also
10 been very close to the national average with it being below the national average in 2023.
11 Again, these results are consistent with AMS's objectives for being "in the middle of the
12 pack" for labor costs, and reflects the small size of the Missouri LDC operations.

13 **Q. Did you consider benchmarking Ameren Missouri's gas operations against other**
14 **peer groups?**

15 A. Yes, we considered using regional data for small LDCs and data for national LDCs that
16 were not constrained by size. For regional small LDC peers, the comparison group becomes
17 too small to be useful (fewer than 12 companies) and has significant data gaps. For the
18 larger group, it is not meaningful to compare a small, largely rural LDC to ones operating
19 in major cities and that are 20 to 30 times the size of the Ameren Missouri's LDC, and that
20 have a much more dense service area. So, we chose to use the national small LDC peer
21 group we have presented.

1 **Q. What can be concluded from the results of these analyses?**

2 A. As a result of the mergers of Union Electric, CIPS, CILCO, and IP, the Company has been
3 able to drive down costs of the businesses. The source of reduced costs is from the
4 consolidation of common corporate and A&G functions which now reside at AMS. These
5 savings result from the elimination of duplicative positions (e.g., a CEO and CFO and
6 Treasurer at each operating company, multiple CIOs, multiple General Counsels, etc.) as
7 well as economies of scale attributable to the provisioning of services by a smaller number
8 of employees than the four individual companies could have achieved separately. In
9 addition, AMS and Ameren Missouri engage in continuous improvement efforts that
10 should be expected to contribute to bringing down Ameren Missouri's largest measure of
11 controllable cost, Administrative & General Expense per customer, which is currently
12 slightly below the average of the peer group for small LDCs. The numbers indicate that
13 these efforts have delivered savings for customers, while maintaining compensation at
14 competitive levels for employees working at AMC subsidiaries

15 **VII. CONCLUSIONS**

16 **Q. Based upon your review of AMS and the services that it provides to its affiliated**
17 **companies, what are your observations and conclusions?**

18 A. My observations and conclusions are as follows:

- 19 • The use of a shared services organizations, such as AMS, is reasonable and consistent
20 with utility industry practices and its use by Ameren Missouri for the services provided
21 in the test year was prudent and reasonable;

Direct Testimony of
Joseph S. Weiss

- 1 • The scope of services offered by AMS to its affiliated companies is consistent with
2 other utility shared services companies with which I am familiar; and
3 • Customers of Ameren Missouri have benefited from the existence of, and services
4 provided by, AMS.

5 **Q. Please summarize what information was relied upon to form the basis of your**
6 **opinions on prudence and reasonableness.**

7 A. The support I have relied on in arriving at my opinions in this case includes:

- 8 • My own analysis of utility holding companies, service companies, Ameren Missouri's
9 A&G costs over time, and my benchmarking of Ameren Missouri's non-fuel O&M and
10 A&G costs versus national averages and Midwest utilities presented in my direct
11 testimony.
- 12 • Multiple versions of Ameren Missouri's Cost Allocation Manual.
- 13 • Documentation pertinent to the Joint Planning and Procurement and Demand Planning
14 Processes for 2022 and 2023, and Ms. Moore's direct testimony in this case discussing
15 those processes.
- 16 • All the testimony submitted in Ameren Missouri's recent electric rate cases (File No.
17 ER-2019-0335 ER-2021-0240, and ER-2024-0319) on affiliate transactions, including
18 Ameren Missouri's filed testimony of Mr. Tom Byrne, Ms. Laura Moore, Mr. Ben
19 Hasse, Ms. Kelly Hasenfratz and Mr. Mitchell Lansford, Staff testimony of Mr. Mark
20 Oligshlaeger and Ms. Kimberly K. Bolin, and the testimony of the Office of Public
21 Counsel witness Mr. Schallenberg.

Direct Testimony of
Joseph S. Weiss

- 1 • All of the data request responses provided on the topic of affiliate transaction costs and
2 compliance in the electric rate cases, which includes a very large volume of material
3 on the following topics:
- 4 ○ Details of numerous affiliate transactions
 - 5 ○ Ameren Missouri's corporate policies and procedures for purchasing such
6 services
 - 7 ○ Ameren Missouri's and AMS's bidding procedures
 - 8 ○ Organization charts for Ameren Missouri and its affiliates
 - 9 ○ Information on shared employees
 - 10 ○ Ameren Missouri's Joint Planning and Procurement procedure
 - 11 ○ Vendor lists and information for Ameren Missouri and AMS
 - 12 ○ Details of corporate contracts for AMS
 - 13 ○ Details of real estate transactions and costs for Ameren Missouri
 - 14 ○ Cost allocation methodologies
 - 15 ○ Compensation studies
 - 16 ○ Tax allocation agreements
 - 17 ○ Employee training processes
 - 18 ○ Audits of affiliate transactions
 - 19 ○ Determinations of the fair market price
 - 20 ○ AMS's and Ameren Missouri's budgeting processes
- 21 • All of the testimony submitted in the CAM docket (File No. EO-2017-0176) including
22 the testimony of Mr. Hasse, Ms. Moore and Mr. Byrne.

Direct Testimony of
Joseph S. Weiss

- 1 • All of the data requests responses provided in the CAM docket, which represent another
2 very large volume of information on affiliate transactions, compliance procedures, cost
3 benchmarking and many other topics.
- 4 • All of the similar material filed in Ameren Missouri's recent gas rate cases (File No.
5 GR-2019-0077 and GR-2021-0241).
- 6 • All of the filings in the Commission's recent affiliate transactions rule workshop (File
7 No. AW-2018-0394).
- 8 • Regulatory actions for past Ameren Missouri rate cases and in past rate cases for its
9 utility affiliates, all of which provided for cost recovery for affiliate provided A&G
10 services (e.g., File No. ER-2016-0179 and Illinois Commerce Commission Docket No.
11 16-0262)).
- 12 • The Commission's decisions in similar cases for other Missouri utilities, including
13 cases for KCP&L (File Nos. EM-2007-0374 and EE-2017-0113), Laclede Gas (File
14 No. GR-2017-0215), and Empire District Electric (File No. AO-2012-0062).
- 15 • Missouri and federal statutes relating to the treatment of costs of affiliate transactions.

16 In aggregate, my testimony reflects my review of thousands of pages of material in
17 preparing the opinions expressed in my testimony, and my experience in utility regulation.

18 **Q. Does this conclude your direct testimony?**

19 A. Yes, it does.

JOSEPH S. WEISS
ASSISTANT VICE PRESIDENT

Mr. Weiss has worked on projects involving revenue requirements, class cost of service, allocation and rate design, cash working capital, rate of return, affiliate transactions, and rate case preparation for gas and electric utilities. As a consultant, Mr. Weiss has provided support for filings with several utility commissions and filed testimony as an expert witness on cash working capital before the Corporation Commission of Oklahoma, the Missouri Public Service Commission, the Illinois Commerce Commission, the Maine Public Utilities Commission, and the Public Utilities Commission of Ohio. He has strong quantitative and research skills and experience in accounting issues. Prior to joining Concentric Energy Advisors, Mr. Weiss was a Consultant with Navigant Consulting, Inc. and has worked for a large Midwest investor-owned utility. Mr. Weiss has an M.B.A. from Southern Illinois University Edwardsville and a B.S. in Business Administration (magna cum laude) with a major in Accounting and Finance from Saint Louis University.

Representative Project Experience

Rates/Regulatory Projects

- Worked on a draft report concerning the gas/electric interdependency of the Pacific Northwest Region.
- Supported lead-lag analysis and testimony for a Canadian electric utility.
- Provided rate case support of a gas rate case filing for a Midwestern gas utility. Work included assisting with a lead-lag study.
- Involved in the calculation and support of a return on equity for a natural gas company.
- Assisted with the preparation of six gas and electric rate case filings for a Midwestern utility. The project included work associated with a gas and electric lead-lag study and the preparation of the minimum filing requirements associated with the rate case. Project included post filing support which involved providing responses and corrections to deficiencies identified by the Illinois Commerce Commission in filing requirements and providing required data in response to data requests of the Illinois Commerce Commission.
- Assisted in the effort to collect and organize plant addition documentation for six Midwest utilities associated with the state commission's audit of rate base.
- Involved in the preparation of an electric rate case filing for an electric transmission and distribution provider in Texas. Work included the completion of the rate filing package associated with the rate case.
- Managed the preparation of the minimum filing requirements for a Midwestern holding company that held three different utility companies. Also managed the preparation of a lead-lag study for the utility. Project included post filing support which involved providing responses and corrections to deficiencies identified by the Illinois Commerce Commission in



filing requirements and providing required data in response to data requests of the Illinois Commerce Commission.

- Managed the preparation of a lead-lag study for an electric rate case filing for a utility in Missouri.
- Worked on the completion of the revenue requirement and filing requirements for an interstate pipeline's rate filing.
- Assisted with a review of the reasonableness of the allocation of shared services costs assigned by Ameren Service Company to the Illinois operating utilities. The review included an assessment of the reasonableness of the accumulated costs, allocation factors employed and resulting allocated costs to each operating utility for the services provided. Concentric also benchmarked the costs of services to assess the reasonableness of the allocated costs compared to other companies.
- Provided testimony analyzing the services and related costs provided by companies affiliated with Ameren Missouri.
- Assisted with an allocated cost of service study and rate design related to an electric rate filing for a Midwestern utility.
- Managed the calculation of the revenue requirement and preparation of a lead-lag study for a gas rate case filing for a utility in Missouri.
- Managed the completion of a lead-lag study for an electric rate filing for a Midwestern utility.
- Managed the preparation of gas and electric rate case filings for a Midwestern utility. The project included work associated with a gas and electric lead-lag study and the preparation of the minimum filing requirements associated with the rate case which included the filing of a future test year. Project included post filing support which involved providing responses and corrections to deficiencies identified by the Illinois Commerce Commission in filing requirements, providing required data in response to data requests of the Illinois Commerce Commission, and assisting company with review and development of testimony
- Managed the completion of the revenue requirement and filing requirements for an interstate pipeline's rate filing.
- Managed the completion of a lead-lag study for an electric filing for a Midwestern utility as well as post-filing support.
- Helped to develop a revenue requirement model to comply with a new performance-based formula ratemaking process for a Midwest electric utility.
- Managed the preparation of an initial formula rate filing for a Midwestern electric utility. The project included work associated with the preparation of the minimum filing requirements and the formula rate template. Project included post filing support which involved providing responses and corrections to deficiencies identified by the Illinois Commerce Commission in filing requirements, providing required data in response to data requests of the Illinois Commerce Commission, and assisting company with review and development of testimony.



- Managed the completion of the revenue requirement and minimum filing requirements for an electric rate filing for a utility in Illinois under new legislation as well as subsequent filings. The work included support throughout the rate case process.
- Assisted with an allocated cost of service study related to a gas rate filing for a Northeastern utility.
- Filed expert testimony in support of the company's cash working capital requirement before the Oklahoma Corporation Commission.
- Managed the preparation of minimum filing requirements utilizing a future test year for a gas filing for a Midwestern utility in multiple rate case filings.
- Managed the completion of lead-lag studies and associated testimony on behalf of our client. Testified to the results of the studies before the Illinois Commerce Commission.
- Prepared a lead-lag study and associated testimony on behalf of our client. Testified to results of the study before the Missouri Public Service Commission.
- Prepared a lead-lag study as well as assistance with the development of the revenue requirement and associated testimony on behalf of our client. Testimony was filed as part of as rate proceeding before the Idaho Public Utilities Commission. The work included support throughout the rate case process.
- Managed the completion of a lead-lag study and associated testimony on behalf of the client in its two most recent rate proceedings. Testimony was filed as part of a rate proceeding before the State Corporation Commission of Virginia.
- Managed the preparation of the Minimum Filing Requirements for a Midwestern gas utility's rate filing utilizing a future test year before the Illinois Commerce Commission and the Company's subsequent filing.
- Managed the completion of a lead-lag study and associated testimony on behalf of the client. Also assisted the client with the development of the revenue requirement. Testimony was filed as part of a rate proceeding before the Maine Public Utilities Commission.
- Managed the completion of a lead-lag study and associated testimony on behalf of the client as part of a rate proceeding before the Tennessee Public Utility Commission.
- Prepared a lead-lag study and associated testimony on behalf of the client. Testimony was filed as part of a rate proceeding in West Virginia.
- Managed the completion of a lead-lag study and associated testimony on behalf of the client. Testimony was filed as part of a rate proceeding before the Georgia Public Service Commission.
- Assisted with the preparation of testimony related to shared services and benchmarking in multiple rate proceedings before the Missouri Public Service Commission.
- Market Research Experience
- Conducted research on gas and electric revenue decoupling mechanisms.
- Researched recent and proposed pipeline projects.



- Research to support expert testimony in a return on equity rate proceeding.

Professional History

Concentric Energy Advisors, Inc. (2007 – Present)

Assistant Vice President

Senior Project Manager

Project Manager

Senior Consultant

Consultant

Navigant Consulting, Inc. (2006 – 2007)

Consultant

Ameren Corporation (2005 – 2006)

Consultant and Tax Intern

Education

Saint Louis University

B.S.B.A., Accounting and Finance, magna cum laude, December 2005

Southern Illinois University Edwardsville

M.B.A., August 2013

SPONSOR	DATE	CASE/APPLICANT	DOCKET	SUBJECT
Illinois Commerce Commission				
Ameren Illinois Company	01/15	Ameren Illinois Company	Docket #15-0142	Cash Working Capital (Gas)
Ameren Illinois Company	04/15	Ameren Illinois Company	Docket #15-0305	Cash Working Capital (Electric)
Ameren Illinois Company	01/18	Ameren Illinois Company	Docket #18-0463	Cash Working Capital (Gas)
Ameren Illinois Company	04/18	Ameren Illinois Company	Docket #18-0807	Cash Working Capital (Electric)
Ameren Illinois Company	02/20	Ameren Illinois Company	Docket #20-0308	Cash Working Capital (Gas)
Ameren Illinois Company	04/20	Ameren Illinois Company	Docket #20-0381	Cash Working Capital (Electric)
Ameren Illinois Company	04/21	Ameren Illinois Company	Docket #21-0365	Cash Working Capital (Electric)
Ameren Illinois Company	01/23	Ameren Illinois Company	Docket #23-0067	Cash Working Capital (Gas)
Ameren Illinois Company	01/23	Ameren Illinois Company	Docket #23-0082	Cash Working Capital (Electric)
Maine Public Utilities Commission				
Bangor Natural Gas Company	03/21	Bangor National Gas Company	Docket # 2021-00024	Cash Working Capital (Gas)
Central Maine Power Company	08/22	Central Maine Power Company	Docket #2022- 00152	Cash Working Capital (Electric)
Missouri Public Service Commission				
Ameren Missouri	07/14	Ameren Missouri	ER 2014-0258	Cash Working Capital (Electric)



SPONSOR	DATE	CASE/APPLICANT	DOCKET	SUBJECT
Ameren Missouri	06/24	Ameren Missouri Electric Rate Filing	ER 2024-0319	Affiliate Transactions and Benchmarking
Public Utilities Commission of Ohio				
Northeast Ohio Natural Gas Corporation	4/23	Northeast Ohio Natural Gas Corporation	Case No. 23-0154-GA-AIR	Cash Working Capital (Gas)
Oklahoma Corporation Commission				
Arkansas Oklahoma Gas Corporation	01/13	Arkansas Oklahoma Gas Corporation	Cause No. PUD 201200236	Cash Working Capital (Gas)

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
1	AES US Services, LLC	<ul style="list-style-type: none"> • AES Southland Energy, LLC • AES Huntington Beach Energy • AES Alamitos Energy, LLC • AES Clean Energy Services, LLC • Indianapolis Power & Light Company • IPALCO Enterprises, Inc. • AES NA Central, LLC • AES Renewable Holdings, LLC • The AES Corporation • AES Alamitos, LLC • AES Big Sky, LLC • DPL Inc. • AES Ohio Generation, LLC • The Dayton Power and Light Company • AES Huntington Beach, LLC • AES North America Development, LLC • AES Hawaii, LLC • Miami Valley Insurance Company • Macgregor Park, Inc. • Miami Valley Lighting, LLC • NA Pua Makani Power Partners, LLC • AES Shady Point, LLC 	<ul style="list-style-type: none"> • COO Office • Market Operations SY • Battery Operations • Commercial Operation • OPS Monitoring & Ctrl • Plant Managers • Storms • Systems Operations • VP, T&D Operations • Settlements • Customer Service • T&D Metering Service • Safety • Environmental Mgt • Strat Acct & Cus Pro • Growth & Strg Invest • Infrstctr Security • Reliability Programs • Vendor Discounts • US SBU Leader • DE Accounting • Management - CFO • Accounts Payable • Technical Accounting • FP&A • Controller • Financial Reporting • Fixed Asset Accounting • Gen & Ops Accounting • Treasury

¹ Represents the service companies that filed the FERC Form 60 for 2023, but data presented is from the 2022 filing.

² Represents the service companies that filed the FERC Form 60 for 2023, but data presented is from the 2022 filing.

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
			<ul style="list-style-type: none"> • Regulatory Accounting • Tax Accounting • Revenue Accounting • Internal Audit • IT Governance & Scrity • IT Management • Cyber Security • IT Enterprise Apps • IT Collaboration Svc • IT Infrastructure • IT Networks • IT Generation Apps • IT T&D Apps • Legal Services • Regulatory Affairs • Local HR • Benefits O&M • Talent COE • Payroll • Total Rewards COE • Purchasing Management • Logistic & Mat Management • A&PM Norms & STDS • Asset Management-T&D • Insurance • A&PM NERC Compliance • A&PM Performance Eng • A&PM Outages & Project • Risk Management • A&PM Technical Eng • Customer Experience • Communications

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
			<ul style="list-style-type: none"> • Employee Overhead Dollar • Pension Clearing • Payroll Taxes O&M • Digital Customer Exp Operations Tech • Digital Prod & ECO • IT Digital Operation • Digital Sol & Innov • Digital Work Exp • Emp Overhead Hours O&M • US Business Resilience • Government Affairs • Regulatory New Products • US Utilities President • Chief Customer Officer
2	Alliant Energy Corporate Services, Inc	<ul style="list-style-type: none"> • Alliant Energy Corporation • Alliant Energy SPE LLC • Wisconsin Power and Light Company • Interstate Power and Light Company • Alliant Energy Resources, LLC • Traverro, Inc. • Cedar Rapids and Iowa City Railway Company • Logistics Park Dubuque, Inc. • Williams Bulk Transfer Inc. • Alliant Energy Investments, Inc. • Iowa Land and Building Company • Alliant Energy Generation, Inc. • Sheboygan Power, LLC • Alliant Energy Finance, LLC • AE Growth & Development, LLC • Comprehensive Energy Solutions, LLC • AE Development Holdco, LLC • Logistics Park Cedar Rapids, LLC 	<ul style="list-style-type: none"> • Accounting Operating • Administrative <ul style="list-style-type: none"> ○ Electric production business units – electric production management and administrative services ○ Electric and gas delivery business units – electric and gas delivery management and administrative services ○ Other business units – other management and administrative services • Corporate <ul style="list-style-type: none"> ○ Income tax expenses and benefits incurred ○ Assets owned by the Service Company that provide benefits to the Associate Companies • Corporate Secretary • Customer Service, Customer Assistance and Customer Relations <ul style="list-style-type: none"> ○ Design and administration of demand-side management programs

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
		<ul style="list-style-type: none"> • Travero Logistics, LLC • Travero EQ LLC • Regen Fiber LLC 	<ul style="list-style-type: none"> ○ Customer billing and payment processing ○ Operations of call center ○ Customer Service, Customer Assistance, Customer Relations, and Research on Product Development and Testing ○ Design and administration of sales and customer assistance programs (other than demand side management programs) • Electric Distribution Engineering and Construction • Environmental Affairs • Facilities • Finance • Fuels • Gas Transmission and Distribution Engineering and Construction • Human Resources • Information Systems • Insurance and Risk Management • Internal Auditing • Investor Relations • Legal • Materials Management • Power Engineering and Construction • Planning • Power Planning <ul style="list-style-type: none"> ○ System Planning – planning of additions to electric generation and distribution systems ○ Generation Control Center – coordination of the operation of electric generating units ○ Distribution Control Centers – coordination of electric distribution systems ○ Energy Market Operations – procures and sells electricity

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
			<ul style="list-style-type: none"> ○ Transmission – provides expertise regarding transmission service from transmission providers, policy development and representation in various venues ● Public and Community Affairs ● Regulatory ● Shareowner Services ● Transportation
3	Ameren Services Company	<ul style="list-style-type: none"> ● Ameren Corporation ● Ameren Development Corporation ● Union Electric Company ● Ameren Transmission Company of Illinois ● Ameren Energy Medina Valley Cogen, LLC ● Ameren Illinois Company ● ATX Southwest, LLC ● ATX East, LLC ● Ameren Transmission Company, LLC ● Lucky Corridor, LLC Company 	<ul style="list-style-type: none"> ● Power Ops and Energy Mgmt ● Controller ● AER Controllers ● Ameren Communications ● Ameren Cyber ● Ameren Services Center ● B&CS Executive ● Continuous Improvement & ATO ● Controller ● Corporate Dev, Environmental & Innovation ● Corporate Internal Audit ● Corporate Policy, Analysis & Environmental ● Corporate Strategy, Innovation, Environmental and Risk ● Corporate Tax ● Customer & Digital Support Services ● Customer Affordability & ATO ● Customer Experience ● Digital ● Facilities & Property Management ● Financial Services ● Fuel ● Human Resources ● IL Elec Ops & Distribution ● IL Elec Ops & Tech Svcs.

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
			<ul style="list-style-type: none"> • IL Energy Transtn, Econ, Comm & Bus Dev • IL Gas Ops & Distribution • IL Gas Ops & Tech Svcs. • IL Ops Administrative • IL Regulatory & Financial Services • Illinois Administration • Legal, Fed Reg & Compliance • Missouri Business Services • Missouri Economic, Community & Business Dev • Missouri Energy Delivery • Missouri Gas Operations • Missouri Strategic Initiatives & Operations Support • MO Regulatory • MO Renewables Development & Environmental • Power Ops & Engineering • Safety, Security & Ops Oversight • Supply Chain • Sustainability, Philanthropy & DE&I • Trans Ops Plan Policy and Reg • Treasurer • UE Generation – Nuclear
4	American Electric Power Service Corporation	<ul style="list-style-type: none"> • Abstract Digital • AEP Amazon • AEP Appalachian Transmission Company, Inc. • AEP Clean Energy Resources LLC • AEP Coal, Inc. • AEP Credit, Inc. • AEP Energy Partners, Inc. • AEP Energy Service Gas Holding Company • AEP Energy Services, Inc. • AEP Energy Supply LLC • AEP Energy, Inc. 	<ul style="list-style-type: none"> • CCO – Administration • CCO – Energy Supply • CCO – Grid Solutions • CCO – Regulated Commercial Operations • CEO – Audit Services • CEO – Administration • CEO – Corporate Human Resources • CEO – Legal • CEO – Strategy & Transformation • CFO – Administration • CFO – Corporate Accounting

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
		<ul style="list-style-type: none"> • AEP Generating Company • AEP Generation Resources • AEP Indiana Michigan Transmission Company, Inc. • AEP Investments, Inc. • AEP Kentucky Coal, LLC • AEP Kentucky Transmission Company, Inc. • AEP Nonutility Funding LLC • AEP Ohio Transmission Company, Inc. • AEP Oklahoma Transmission Company, Inc. • AEP OnSite Partners, LLC • AEP Pro Serv, Inc. • AEP Renewables, LLC • AEP Retail Energy Partners LLC • AEP Southwestern Transmission Company, Inc. • AEP T&D Services, LLC • AEP Texas Company • AEP Transmission Company, LLC • AEP Transmission Holding Company, LLC • AEP Transmission Partner LLC • AEP Utility Funding LLC • AEP West Virginia Transmission Company, Inc. • American Electric Power Company • Appalachian Power Company • Apple Blossom Wind, LLC • Auwahi Wind Energy, LLC • Blackhawk Coal Company • Bold Transmission, LLC • BSE Solutions LLC • Central Appalachian Coal Company • Central Coal Company • Conesville Coal Preparation Company • CSW Energy, Inc. 	<ul style="list-style-type: none"> • CFO – Corporate Planning & Budgeting • CFO – Investor Relations • CFO – Tex Services • CFO – Treasury & Risk • Chief Info & Tech – Business Operations & Performance • Chief Info & Tech – Information Technology • Chief Info & Tech – Operations & Performance Transformation • Chief Info & Tech – Real Estate & Workplace Services • Chief Info & Tech – Security • Energy Delivery – Administration • Energy Delivery – Operations • Energy Delivery – Engineering Services • Energy Delivery – Project & Construction Management • Energy Delivery – Transmission Field Services • Energy Delivery – Vegetation Management • Energy Services – Corporate Safety & Health • Energy Services – Administration • Energy Services – Supply Chain & Fleet Operations • External Affairs – Corporate Communications • External Affairs – Customer Solutions • External Affairs – Economic & Business Development • External Affairs – Administration • External Affairs – Federal Affairs • External Affairs – Regulatory Services • Generation – Engineering & Field Services • Generation – Environmental Services • Generation – Generating Assets • Generation – Generation Administration

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
		<ul style="list-style-type: none"> • Desert Sky Wind Farm LLC • Dolet Hills Lignite Co, LLC • Electric Transmission America • Electric Transmission TX, LLC • Franklin Real Estate Company Grid Assurance LLC • Indiana Michigan Power Company Jacumba Solar LLC • Kentucky Power Company • Kingsport Power Company • Kyte Works, LLC • NM Renewable Development, LLC • Ohio Franklin Realty, LLC • Ohio Power Company, • Oxbow Lignite Company, LLC, • Public Service Company of Oklahoma • RITELine Indiana, LLC • Sempra Renewables, LLC • Snowcap Coal Company, Inc. • Solar LLCs • Southern Appalachian Coal Company • Southwestern Electric Power Company • Transource Energy, LLC • Transource Maryland • Transource Missouri, LLC • Transource Pennsylvania • Transource West Virginia, LLC • Trent Wind Farm LLC • United Sciences Testing, Inc. • Wheeling Power Company 	<ul style="list-style-type: none"> • Generation – Project Controls & Construction Services • Utilities – Customer Operations & Support • Utilities – Utility Operations
5	ATC Management Inc	<ul style="list-style-type: none"> • American Transmission Company LLC • ATC Development Manager Inc. 	<ul style="list-style-type: none"> • Accounting & Finance • Administrative <ul style="list-style-type: none"> ○ Compensation & Benefits ○ Corporate Communications

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
			<ul style="list-style-type: none"> ○ Facilities ○ Human Resources ○ Prevention and Response ○ Corporate Security ● Asset Maintenance & Commissioning ● Asset Planning & Engineering ● Audit & Risk Management ● Business Administration Services <ul style="list-style-type: none"> ○ Data Analytics ○ Project Controls Office (Supports construction efforts by providing estimating, scheduling and cost engineering services) ○ Supply Chain ● Business Partner Services (Develops reporting and procedures to support Construction, Asset Management and other departments and includes the asset accounting function) ● Construction ● Corporate ● Information Technology <ul style="list-style-type: none"> ○ Information Technology ○ Communication Infrastructure ● General Counsel <ul style="list-style-type: none"> ○ Legal ○ Policy & Strategy ● Officers Management ● External Affairs <ul style="list-style-type: none"> ○ Real Estate ○ Environmental ○ Government and Public Affairs & Local Relations ○ Customer Relations ● Real Time Operations ● System Operations

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
6	Avangrid Service Company	<ul style="list-style-type: none"> • IB. Distrib. Electrica SA • Avangrid Networks, Inc. • New York State Electric & Gas Corporation • Rochester Gas and Electric Corporation • RGS Energy Group, Inc. • Central Maine Power Company • CMP Group, Inc. • The Union Water Power Company • Maine Electric Power Company, Inc. • Norvarco • Chester SVC Partnership • Avangrid Enterprises, Inc. • Maine Natural Gas Corporation • Avangrid New York Transco • NECEC Transmission LLC • UIL Holdings Corporation • The United Illuminating Company • Connecticut Natural Gas Corporation • The Southern Connecticut Gas Company • The Berkshire Gas Company 	<ul style="list-style-type: none"> • System Planning • Governing Bodies • Innovation, Environment & Quality • Real Estate and General Services • Corporate Security • IT • Human Resources • Purchasing • Insurance • Finance and Treasury • Risks • Investor Relations • Control • Administration • Tax • Communications • Legal Services • Corporate Development • DG Businesses and Regulation • External Audit • Secretary of the Board • Internal Audit • Compliance • Technical Services
7	Black Hills Service Company, LLC	<ul style="list-style-type: none"> • Wyodak Resources Development Corp • Black Hills Wyoming , LLC • Black Hills Electric Generation, LLC • Black Hills Non-Regulated Holdings, LLC • Black Hills Colorado IPP, LLC • N780BH, LLC • Black Hills Colorado Wind, LLC • Northern Iowa Wind Power, LLC 	<ul style="list-style-type: none"> • NONE LISTED

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
		<ul style="list-style-type: none"> • BHERR Assets • BHE Renewable Resources LLC • Black Hills Corporation • Black Hills Exploration and Production, Inc • Black Hills Wyoming Gas, LLC • Black Hills Power, Inc • Cheyenne Light Fuel and Power Company • Black Hills Energy Service Company • Black Hills Kansas Gas Utility Company, LLC • Black Hills Iowa Gas Utility Company, LLC • Black Hills Colorado Electric, LLC • Black Hills Colorado Gas, Inc. • Black Hills Shoshone Pipeline, LLC • Black Hills Energy Arkansas, Inc. • Rocky Mountain Natural Gas, LLC • Black Hills Nebraska Gas, LLC • Black Hills Wyoming Gas, LLC 	
8	CenterPoint Energy Service Company, LLC	<ul style="list-style-type: none"> • CenterPoint Energy Houston Electric, LLC • CenterPoint Energy Resources Corp. • CenterPoint MRT Services Company • Arkansas Louisiana Finance Corp. • CenterPoint Energy Properties, Inc. • CenterPoint Energy Arkla • CenterPoint Energy Minnesota Gas • Minnesota Intrastate Pipeline Company • CenterPoint Energy Intrastate Pipelines, LLC • CenterPoint Energy Entex • Allied Materials Corporation • CenterPoint Energy Investment Management, Inc. • CenterPoint Energy, Inc. • Utility Holding, LLC • CenterPoint Energy Southeastern Pipelines Holding, LLC 	<ul style="list-style-type: none"> • Administrative and service functions involving system-wide coordination, strategy and compliance functions

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
		<ul style="list-style-type: none"> • Labo Land Holdings, LLC • CenterPoint Energy Home Service Plus, LLC • CenterPoint Energy Intelligent Energy Solutions , LLC • CenterPoint Energy Midstream Administration • Energy Systems Group, LLC • CNP Foundation, Inc. • Indiana Gas Company, Inc. • Vectren Energy Delivery of OH, Inc. • Vectren Utility Holdings, Inc. • Vectren Energy Services Corporation • Vectren Capital, Corp. • Vectren Corp • Southern Indiana Gas & Electric Company 	
9	Columbia Pipeline Group Service Company	<ul style="list-style-type: none"> • Columbia Gas Transmission LLC • Columbia Gulf Transmission Co • Crossroads Pipeline Company • Portland Natural Gas Transmission 	<ul style="list-style-type: none"> • President & CEO • Executive V.P <ul style="list-style-type: none"> ○ Commercial Operation ○ Project Planning and Operations • CFO <ul style="list-style-type: none"> ○ Controller - Financial Reporting & Corporate Accounting ○ Cost Accounting and Business Unit Accounting ○ Financial Planning & Budget Reporting - Risk Management ○ Department of Taxation ○ Capital Markets & Treasury • Stakeholder Relations & Technical Services & General Counsel <ul style="list-style-type: none"> ○ Internal Audit & Compliance - SOX Compliance ○ Legal & Corporate Secretarial ○ Legal – Land/Litigation ○ Legal – Corporate/Commercial ○ Legal – Compliance & Ethics • Corporate Services

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
			<ul style="list-style-type: none"> • Human Resources <ul style="list-style-type: none"> ○ Compensation & Benefits ○ HR Operations • Information Services • Facility Services & Supply Chain
10	Dominion Energy Services, Inc.	<ul style="list-style-type: none"> • 96WI 8ME LLC • Atlanta Farms Solar Project, LLC • Bellflower Holdings, LLC • Birdseye Renewable Energy, LLC • Blackville Solar LLC • Blue Ocean Energy Marine • BrightSuite Home, LLC • BrightSuite, Inc. • Buckingham Solar I LLC • Clipperton Holdings LLC • CNG Coal Company • Correctional Solar LLC • DE 700 Canal Place, LLC • Denmark Solar, LLC • Domininon Privatization Holding • Dominion ACP Holding, Inc. • Dominion Atlantic Coast Pipeline LLC • Dominion Capital, Inc. • Dominion Energy Fuel Services, Inc. • Dominion Energy Generation Marketing, Inc. • Dominion Energy Kewaunee, Inc. • Dominion Energy Nuclear Connecticut, Inc. • Dominion Energy Payroll Company, Inc • Dominion Energy Privatization Texas, LLC • Dominion Energy Questar Corporation • Dominion Energy RNG Holdings II, Inc. • Dominion Energy RNG Holdings, Inc. 	<ul style="list-style-type: none"> • Accounting <ul style="list-style-type: none"> ○ Payroll Processing ○ Accounts Payable Processing ○ Fixed Assets Accounting • Information Technology, Electronic Transmission and Computer Services and Software Pooling <ul style="list-style-type: none"> ○ LDC/EDC Computer Applications ○ Other Computer Applications, including Software/Hardware Pooling ○ Telecommunications Applications • Human Resources <ul style="list-style-type: none"> ○ Human Resources • Business Services <ul style="list-style-type: none"> ○ Facility Services ○ Fleet Administration ○ Security ○ Gas Supply ○ Risk Management • Corporate Planning <ul style="list-style-type: none"> ○ Corporate Planning • Supply Chain <ul style="list-style-type: none"> ○ Purchasing • Tax <ul style="list-style-type: none"> ○ Tax Accounting and Compliance • Customer Services <ul style="list-style-type: none"> ○ Customer Payment (Remittance) Processing • Treasury/ Finance <ul style="list-style-type: none"> ○ Treasury and Cash Management • Office Space & Equipment

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
		<ul style="list-style-type: none"> • Dominion Energy South Carolina, Inc. • Dominion Energy Technical Solutions, Inc. • Dominion Energy Terminal Company, Inc. • Dominion Energy, Inc. • Dominion Generation, Inc. • Dominion Greenbrier, Inc. • Dominion Lands, Inc. • Dominion Nuclear Projects, Inc. • Dominion Privatization Pennsylvania, LLC • Dominion Privatization South Carolina, LLC • Dominion Products and Services, Inc. • Dominion Retail Gas Holdings, Inc. • Dominion Solar Projects D, Inc. • Dominion Solar Projects III, Inc. • Dominion Solar Projects IV, Inc. • Dominion Solar Projects V, Inc. • Dominion Solar Projects VI • Dominion Solar Projects VII • Dominion Solar Services, Inc. • Dominion Voltage, Inc. • Eastern Shore Solar LLC • Fremont Farm, LLC • Greenville Company Solar, LLC • Hardin Solar Energy, LLC • Hecate Energy Cherrydale LLC • Hecate Energy Clarke County LLC • Hope Gas, Inc. • Innovative Solar 37, LLC • Madison Solar, LLC • Moffett Solar 1, LLC • Moorings Farm 2, LLC • Mustang Solar, LLC 	<ul style="list-style-type: none"> ○ Corporate Office & Electricity ○ Other Service: Accounting Services ○ Audit ○ Business Planning ○ Corporate Secretary ○ Energy Marketing ○ Environment ○ Executive ○ External Affairs ○ General Services ○ Legal ○ Operations ○ Travel Services ○ Aviation

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
		<ul style="list-style-type: none"> • Pikeville Farm, LLC • Public Service Company of North Carolina • Questar Gas Company • Questar InfoComm, Inc. • Ridgeland Solar Farm I, LLC • SCANA Corporation • Scott-II Solar LLC • Seabrook Solar, LLC • Siler Solar, LLC • South Carolina Generating Company, Inc. • Southampton Solar LLC • Summit Farms Solar, LLC • Sussex Drive Solar Project, LLC • The East Ohio Gas Company • Trask East Solar, LLC • TWE Myrtle Solar Prj, LLC • Virginia Electric and Power Company • Virginia Power Nuclear Services Company • Virginia Power Services Energy Corp., Inc. • Virginia Power Services, LLC • VP Property, Inc. • Wakefield Solar, LLC • Wexpro Company • Wexpro Development Company • Wexpro II Company • Wilkinson Solar LLC • Yemassee Solar LLC 	
11	Duke Energy Business Services, LLC	<ul style="list-style-type: none"> • Bison Insurance Company, Ltd • Cinergy Corp • Cinergy Receivables, LLC • DE Commercial Enterprises Inc. • DE Renewables Commercial LLC 	<ul style="list-style-type: none"> • Information Systems • Meters • Transportation • System Maintenance • Marketing and Customer Relations

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
		<ul style="list-style-type: none"> • DE Transmission Holding Company, LLC • DEGS NC Solar LLC • DEGS Solar, LLC • DEGS Wind I, LLC • Duke Energy Carolinas, LLC • Duke Energy Corp. • Duke Energy Corporate Services, Inc. • Duke Energy Florida (f/k/a Progress Energy Florida) • Duke Energy Indiana, Inc. • Duke Energy Kentucky, Inc. • Duke Energy Ohio, Inc. • Duke Energy Ohio, Inc. (Non-Reg) • Duke Energy Pipeline Holding • Duke Energy Progress (f/k/a Progress Energy Carolinas, Inc.) • Duke Energy Registration Services, Inc. • Duke Energy Services Inc. • Duke Generation Services Holding Co. Inc. • Duke Technologies, Inc. • Frontier Windpower II LLC • Frontier Windpower LLC • KO Transmission • Piedmont Natural Gas Company Inc. • REC Solar Commercial Corp. • Symphony Breeze, LLC • Symphony Sun, LLC 	<ul style="list-style-type: none"> • Transmission and Distribution Engineering and Construction • Power Engineering and Construction • Human Resources • Supply Chain • Facilities • Accounting • Power and Gas Planning and Operations • Public Affairs • Legal • Rates • Finance • Rights of Way • Internal Auditing • Environmental, Health and Safety • Fuels • Investor Relations • Planning • Executive • Nuclear Development
12	Entergy Enterprises, Inc	<ul style="list-style-type: none"> • EAM Nelson Holding, LLC • EK Holding III, LLC • Entergy Asset Management • Entergy Finance Company, LLC • Entergy Global, LLC • Entergy Int Holdings Ltd, LLC-E • Entergy Int Investments No 2 	<ul style="list-style-type: none"> • Corporate • Finance and Accounting • Information Technology • Nuclear Operations • Power Generation

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
		<ul style="list-style-type: none"> • Entergy International Ltd, LLC • Entergy Nuc Finance Holding Inc. • Entergy Nuclear Fitzpatrick, LLC • Entergy Nuclear Holding Corp-No. 1 • Entergy Nuclear Vermont Investment Corp. • Entergy Nuclear, Inc. • Entergy Nuclear Nebraska, LLC • Entergy Nuclear Operations, Inc. • Entergy Nuclear Palisades, LLC • Entergy Nuclear Power Mktg, LLC • Entergy Power E&C Holding, LLC • Entergy Power, LLC • Entergy Power RS LLC • Entergy Power Ops U.S. Inc. • Entergy Services, LLC • Entergy Tech Holding Co-Parent • Entergy Ventures, Inc. • EP Gas Holding Corp. • EP Gas Operations Corp. • EWO Holdings Inc. • EWO Marketing, LLC • EWO WIND II - EPGC • Merchant Holdings Prop, LLC • TLG Services, Inc. • Vermont Yankee Asset Retirement Management, LLC • AR Searcy Project Company, LLC • Deferred 	
13	Entergy Nuclear Operations, Inc	<ul style="list-style-type: none"> • Entergy Arkansas, LLC • Entergy Enterprises, Inc. • Entergy Louisiana LLC • Entergy Operations Inc. • Entergy Services LLC 	<ul style="list-style-type: none"> • Corporate • Finance and Accounting • Information Technology • Nuclear Operations

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
		<ul style="list-style-type: none"> • Deferred 	
14	Entergy Operations, Inc	<ul style="list-style-type: none"> • Entergy Arkansas, LLC • Entergy Enterprises, Inc. • Entergy Louisiana LLC • Entergy Mississippi LLC • Entergy New Orleans LLC • Entergy Nuclear Operations Inc. • Entergy Operations Inc. • Entergy Services LLC • Entergy Texas, Inc. • System Energy Resources, Inc. • Deferred 	<ul style="list-style-type: none"> • Corporate • Finance & Accounting • Information Technology • Nuclear Operations
15	Entergy Services, LLC	<ul style="list-style-type: none"> • Entergy Arkansas, LLC • Entergy Corporation • Entergy Enterprises, Inc. • Entergy Louisiana LLC • Entergy Mississippi LLC • Entergy New Orleans LLC • Entergy Operations Inc. • Entergy Services Holding Inc. • Entergy Services LLC • Entergy Texas, Inc. • Entergy Utility Holding Co, LLC • Morpheus One Holdings, LLC • System Energy Resources, Inc. • AR Searsy Partnership, LLC • AR Searsy Project Company, LLC • MS Sunflower Project Co, LLC • Deferred 	<ul style="list-style-type: none"> • Corporate • Distribution • Finance & Accounting • Gas Operations • Information Technology • Nuclear Operations • Power Generation • President • Transmission
16	Evegy Services, Inc.	<ul style="list-style-type: none"> • None Listed 	<ul style="list-style-type: none"> • Evegy Services, Inc. did not provide services to Evegy, Inc. or its subsidiaries during 2022.

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
17	Eversource Energy Service Company	<ul style="list-style-type: none"> • Connecticut Light and Power Company • Eversource Energy Parent • Eversource Energy Transmission Ventures Inc. • Eversource Gas Company of Massachusetts • Eversource Gas Transmission II LLC • Eversource Investment LLC • Eversource Investment Service Company • Eversource LNG Service Company LLC • Eversource Water Ventures • Harbor Electric Energy Company • Hopkinton LNG Corp. • HWP Company • North Atlantic Energy Corporation • North Atlantic Energy Service Corporation • Northeast Generation Services Company • Northern Pass Transmission LLC • NSTAR Electric Company • NSTAR Gas Company • NU Enterprises • Properties Inc. • Public Service Company of New Hampshire • Renewable Properties Inc. • The Rocky River Realty Company • Yankee Energy System Inc. • Yankee Gas Services Company 	<ul style="list-style-type: none"> • Benefits • Building Rent and Maintenance • Corporate Relations • COVID-19 • Customer Group • Depreciation • Electric Distribution • Energy Supply • Engineering • Enterprise Risk Management • Finance and Accounting • General Administration • Human Resources • Information Technology • Internal Audit + Security • Investor Relations • Legal • Miscellaneous • Operations Administration • Operations Services • Safety • Supply Chain + Real Estate + Materials • Taxes • Transmission
18	Exelon Business Services Company, LLC	<ul style="list-style-type: none"> • Atlantic City Electric Co. • ATNP Finance Company • Baltimore Gas and Electric Company • BGE Home Products & Services, LLC • CER Generation LLC (Hillabee) • Commonwealth Edison Company • Constellation Energy Comm Grp. 	<ul style="list-style-type: none"> • Corporate Governance Areas <ul style="list-style-type: none"> ○ Communications ○ Corporate Governance (including Corporate Secretary) ○ Corporate Security ○ Executive ○ Finance

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
		<ul style="list-style-type: none"> • Constellation Energy Nuclear Group, LLC (dba CENG, LLC) • Constellation NewEnergy, Inc • Constellation Power, Inc. • Constellation Solar Holdings, LLC. • Delmarva Power & Light Co. • Distrigas of Massachusetts LLC • Exelon Clearsight, LLC • Exelon Corporation • Exelon Enterprises Company, LLC • Exelon Framingham, LLC • Exelon Generation Company, LLC • Exelon New Boston, LLC • Exelon New England Holdings, LLC • Exelon PowerLabs, LLC • Exelon Transmission Company, LLC • Exelon West Medway, LLC • Exelon Wind, LLC • Exelon Wyman, LLC • Exelorate Enterprises, LLC • PECO Energy Company • PEPCO Holdings Inc. • PHI Service Company. • Potomac Electric Power Co. • RITELine Transmission 	<ul style="list-style-type: none"> ○ General Company Activities including interest, severance, and income taxes ○ Government Affairs and Public Policy ○ Legal Services • Exelon Utility Focused Items <ul style="list-style-type: none"> ○ Transmission Operations and Planning • Human Resources <ul style="list-style-type: none"> ○ Human Resources • Real Estate <ul style="list-style-type: none"> ○ Real Estate Services • Supply <ul style="list-style-type: none"> ○ Supply – purchasing / activities related to materials ○ Supply – purchasing / activities related to services ○ Supply – combined materials and services related purchasing / activities ○ Supply Administration ○ Credit card Program Administration • Information Technology (IT) <ul style="list-style-type: none"> ○ IT related to corporate governance areas ○ IT related to utility customer systems, IT projects and applications ○ IT governance and other items of general nature
19	FirstEnergy Service Company	<ul style="list-style-type: none"> • AET PATH Company, LLC • Allegheny Generating Company • Allegheny Energy Supply, LLC • Allegheny Ventures • American Transmission Systems, Inc. • Bay Shore Power Company • FirstEnergy Corp. • FirstEnergy Properties, Inc. 	<ul style="list-style-type: none"> • President & CEO Support • Transmission, Distribution Operations Support • SVP & Chief Financial Officer • Strategy, LT planning & Business Performance Support • Information Technology Support • Supply Chain Support • Accounting & Tax Support

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
		<ul style="list-style-type: none"> • FirstEnergy Transmission, LLC • FirstEnergy Ventures Corporation • Jersey Central Power & Light Company • Metropolitan Edison Company • Mid-Atlantic Interstate Transmission, LLC • Monongahela Power Company • Ohio Edison Company • PATH Allegheny Trans. Co. • PATH Allegheny VA Trans. • Pennsylvania Electric Company • Pennsylvania Power Company • Suvon, Inc. • The Cleveland Electric Illuminating Company • The Potomac Edison Company • The Toledo Edison Company • Trans-Allegheny Interstate Line Company • West Penn Power Company 	<ul style="list-style-type: none"> • Treasury Support • Risk Support • Internal Auditing Support • Legal Support • Rates & Regulatory Affairs Support • External Affairs Support • Corporate Responsibility & Communications Support • Corporate Affairs & Community Involvement Support • Human Resources & Corporate Services Support • Ethics & Compliance Support Investor Relations, Corp Responsibility & Communications Support
20	LG&E and KU Services Company	<ul style="list-style-type: none"> • Louisville Gas and Electric Company • Kentucky Utilities Company • Western Kentucky Energy Corp. • FCD LLC • LG&E and KU Capital LLC • PPL Services Corporation • PPL Electric Utilities Corporation • PPL Strategic Development, LLC • PPL Rhode Island Holdings, LLC • The Narragansett Electric Company 	<ul style="list-style-type: none"> • Customer Service • Sales and Marketing • Economic Development and Major Accounts • Meter Reading Services • Cash Remittance • Billing Integrity • Energy Efficiency • Smart Grid Strategy • Field Services • CCS Retail Business Readiness • Project Engineering • System Laboratory • Generation • Generation Services and Safety • Fuel Procurement

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
			<ul style="list-style-type: none"> • Project Development • Strategy • Reliability and Tariffs • Operations and Construction • Reliability and Compliance • Energy Marketing • Market Forecasting • Load Forecasting • Generation Planning and Analysis • Network Trouble and Dispatch • Electric Engineering • Distribution Asset Management • Forestry • Substation Construction and Maintenance • Budgeting • Financial Planning • Accounting and Reporting • Property Accounting • Revenue Accounting • Payroll • Tax Accounting • Compliance and Reporting • Audit Services • Sarbanes-Oxley Compliance • Treasury and Corporate Finance • Risk Management • Credit Administration • Energy Marketing Trading Controls • Supply Chain • Accounts Payable • IT Security • IT Applications Development and Support

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
			<ul style="list-style-type: none"> • IT Infrastructure and Operations • IT Governance • IT Business Services • IT Major Projects • Legal • Compliance • Environmental Affairs • Regulatory Affairs • Government Affairs Management • Internal Communications • External and Brand Communications • Public Affairs Management • Facilities and Buildings • Security • Production Mail • Document • Process Management and Performance • Right-of-Way • Transportation • HR Compensation • HR Benefits • Other HR Services • Health and Safety • Executive Management
21	Liberty Energy Utilities (New Hampshire) Corp	<ul style="list-style-type: none"> • None Listed 	<ul style="list-style-type: none"> • No services listed
22	National Grid Engineering & Survey, Inc	<ul style="list-style-type: none"> • Boston Gas Company • Brooklyn Union Gas-KEDNY • Colonial Gas Company • Massachusetts Electric Co. • Nantucket Electric Co. 	<ul style="list-style-type: none"> • Operations <ul style="list-style-type: none"> ○ Maintenance and Construction ○ Electric Power Plant Operations ○ Management of Complex Construction Projects ○ Resource Planning ○ Response and Operations Performance Activities

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
		<ul style="list-style-type: none"> • NE Hydro-Trans Corp. • NE Hydro-Trans Elec Co. • New England Power Company • NG Development Holdings • KS Gas East Corp-KEDLI • NG Generation LLC • NG Glenwood Energy Center • NG LNG LP Regulated Entity • NG Port Jeff Energy Center • NG Services, Inc. • National Grid USA Parent • NGUSA Service Company • Niagara Mohawk Power Corp. • Transgas Inc. • Narragansett Electric Co. 	
23	National Grid USA Service Company Inc	<ul style="list-style-type: none"> • Boston Gas Company • Brooklyn Union Gas-KEDNY • Colonial Gas Company • Massachusetts Electric Co. • Nantucket Electric Co. • Narragansett Electric Co. • NE Electric Trans Corp. • NE Hydro-Trans Corp. • NE Hydro-Trans Elec Co. • New England Power Co. • NG Development Holdings • NG Engineering Srvcs, LLC • KS Gas East Corp-KEDLI • NG Generation LLC • NG Glenwood Energy Center • NG LNG LP Regulated Entity • NG NEHoldings 2 LLC 	<ul style="list-style-type: none"> • US Human Resources <ul style="list-style-type: none"> ○ Compensation, Benefits & Pensions ○ HR SVP ○ Labor & Employee Relations ○ Talent & Diversity ○ Talent Acquisition ○ US HR Business Partner • US Finance <ul style="list-style-type: none"> ○ Business Partnering ○ Controllership ○ US Finance ○ Risk Control & Compliance ○ US CFO • Total US IT <ul style="list-style-type: none"> ○ US CIO ○ Global Solution Development RTB ○ Infrastructure & Operations ○ Commercial

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
		<ul style="list-style-type: none"> • NG Port Jeff Energy Center • NG Services, Inc. • National Grid USA Parent • Niagara Mohawk Power Corp. • Transgas Inc. • NG Electric Services • PSEG Electric Serv TSA Co. • NG North America Inc. • NG Ventures Consolidated • NG Billing Entity 	<ul style="list-style-type: none"> ○ Security ○ LOCKED-IS Legacy Org • US Legal <ul style="list-style-type: none"> ○ Regulatory Strategy ○ Litigation, Environment & Employ ○ US General Counsel • US Human Resources <ul style="list-style-type: none"> ○ Global HRD ○ Global Academy ○ Global HR Business Partners ○ HR IT & Digital • Global Finance <ul style="list-style-type: none"> ○ Claims ○ Investment Management ○ US Insurance ○ M&A ○ US Tax ○ US Treasury • Global Legal <ul style="list-style-type: none"> ○ Internal Compliance ○ Records Management and Reg Comply ○ US Risk Management ○ US Legal ○ Senior Counsel Corporate • Corporate Affairs <ul style="list-style-type: none"> ○ Global Corporate Affairs ○ Public Affairs • Audit <ul style="list-style-type: none"> ○ US Audit • New York and New England Gas – Capital Delivery <ul style="list-style-type: none"> ○ Capital Delivery Programs ○ Capital Delivery SVP ○ Capital Delivery – Electric ○ Capital Delivery – Gas

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
			<ul style="list-style-type: none"> ○ Capital Project Development ○ Contract Management ○ Project Controls & Estimating ○ Billing, Collections & Compliance ○ Fleet Management ● Corporate Affairs <ul style="list-style-type: none"> ○ Chief Customer Officer ○ Sales & Solutions ○ Customer Process Enablement ○ Customer Sales & Solutions ○ National Grid Partners ○ Marketing & Product Growth ● COO Electric - NY <ul style="list-style-type: none"> ○ NE Transf Process Digital Data ○ Elec Planning & Performance Management ○ Emergency Planning & Electric Services ○ Maintenance & Const NY & NE Elec. ○ Asset Mgmt & Engineering – NYE & NE ● New York & New England Gas <ul style="list-style-type: none"> ○ COO Gas NY & NE ○ Ops Strategy & Performance – NY Gas ○ G&E –Gas Enablement Project ○ Ops Strategy & Performance – NE Gas ○ US Gas Engineering ○ Work & Resource Management ● US Procurement Consolidated <ul style="list-style-type: none"> ○ Chief Procurement Officer ○ OP Support Process & Pef-NY ○ US Procurement ○ Global SHE ● NE President <ul style="list-style-type: none"> ○ US Policy & Social Impact ● NY President <ul style="list-style-type: none"> ○ Performance & Strategy-NY

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
			<ul style="list-style-type: none"> • RI President <ul style="list-style-type: none"> ○ Performance & Strategy-RI • Safety, Health & Environment – NY & NE <ul style="list-style-type: none"> ○ Corporate Safety ○ Health & Field Safety, -NY ○ US Human Resources ○ Health & Wellbeing ○ Process Safety ○ Safety Policy & Programs ○ SHE-VP ○ US Business Assurance VP • Strategy & Regulation <ul style="list-style-type: none"> ○ New England Pricing ○ New England Revenue Reqmt. ○ New York Pricing ○ New York Revenue Reqmt. ○ Reg Process Excellence ○ Reg Strategy & Int Analytics ○ Strategy & Regulation SVP ○ Business Planning, Development & Process ○ Electric Transformation ○ Power Plant Operations ○ Combustion Turbines ○ GenCo Admin Services ○ Tx Planning & Asset Mgmt. • Transmission, Gen & Energy <ul style="list-style-type: none"> ○ AMI & Grid Mod ○ Analytics & Performance ○ BE-Internal Consultancy ○ BMS, Assurance & Risk ○ Chief Customer Officer TO ○ Chief Transformation Officer ○ GBE – Gas Enablement Project • Project Volt Business Enablement

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
24	NiSource Corporate Services Company	<ul style="list-style-type: none"> • Columbia Gas of Kentucky Inc. • Columbia Gas of Maryland Inc. • Columbia Gas of Massachusetts • Columbia Gas of Ohio Inc. • Columbia Gas of Pennsylvania • Columbia Gas of Virginia Inc. • Columbia of Ohio Receivables • Columbia of PA Receivables • NiSource Development Co Inc. • NiSource Energy Technologies • NiSource Inc. • NiSource Insurance Corp Inc. • Northern Indiana Public Service Company LLC • Indiana Crossroads Wind Gen • Rosewater Wind Farm LLC 	<ul style="list-style-type: none"> ○ US Transformation Architecture • Accounting and Statistical Services • Auditing Services • Budget Services • Business Services • Corporate Services • Customer Billing, Collection, and Contact Services • Employee Services • Engineering and Research Services • Facility Services • Gas Dispatching Services • Information Services • Information Technology Services • Insurance Services • Land/Surveying Services • Legal Services • Officers • Operations Support and Planning Services • Purchasing, Storage and Disposition Services • Regulatory Services • Tax Services • Transportation Services • Treasury Services
25	Onward Energy Management, LLC	<ul style="list-style-type: none"> • None Listed 	<ul style="list-style-type: none"> • None Listed
26	PHI Service Company	<ul style="list-style-type: none"> • Potomac Electric Company • Delmarva Power & Light Company • Atlantic City Electric Company • Exelon Business Services Company, LLC • Pepco Holdings LLC • Commonwealth Edison Company • Baltimore Gas and Electric Company 	<ul style="list-style-type: none"> • Executive Management • Support Services <ul style="list-style-type: none"> ○ Vehicle Resource Management ○ Building Services ○ Claims Administration Services ○ Other Services • Financial Services • Human Resources

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
		<ul style="list-style-type: none"> • PECO Energy Company • Conective Property & Investments, Inc • Exelon Generation Power • Conectiv LLC 	<ul style="list-style-type: none"> • Legal Services • Customer Services • Information Technology • Governmental Affairs <ul style="list-style-type: none"> ○ Customer Research and Account Management Services ○ Other Government Affairs Services • Communication Services • Regulatory Services <ul style="list-style-type: none"> ○ Customer Energy ○ Other Regulatory Services • Regulated Electric and Gas Operation Services <ul style="list-style-type: none"> ○ System Operations Services ○ Meter Maintenance and Testing Services ○ Other Delivery Services • Supply Services <ul style="list-style-type: none"> ○ Utility Storeroom Services ○ Other Supply Services
27	PNMR Services Company	<ul style="list-style-type: none"> • PNM • PNMR Holding Company • TNMP • PNMR D 	<ul style="list-style-type: none"> • Financial Systems • Accounts Payable • Asset Management • Direct-PNMR Utility • Co 6 Utility General • Direct-PNM Utility • IT Infrastructure • Lewisville Building (Garden Ridge) • Dallas-Las Colinas Building • Downtown Albuquerque Buildings • Aztec Building • Maximo (PNMR)
28	PPL Services Corporation	<ul style="list-style-type: none"> • PPL Corporation • PPL Subsidiary Holdings, LLC 	<ul style="list-style-type: none"> • Corporate Audit Services - Direct <ul style="list-style-type: none"> ○ Corporate Compliance Officer

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
		<ul style="list-style-type: none"> • PPL Energy Holdings, LLC • PPL Capital Funding, Inc. • PPL Strategic Development, LLC • PPL Power Insurance LTD • PPL EU Services Corporation • CEP Reserves, Inc. • CEP Lending, Inc. • PPL Electric Utilities Corporation • PPL Translink, Inc. • PPL UK Holdings, LLC • PPL UK Resources Limited • PPL Global, LLC • PMDC International Holdings, Inc. • PPL Barbados SRL • PPL Atlantic Holdings, LLC • PPL WPD Limited • LG&E and KU Services Company • PPL Rhode Island Holdings, LLC • The Narragansett Electric Company • PPL Distributed Energy Resources, LLC • PPL Safari Holdings, LLC • PPL Safari Energy, LLC • PPL Technology Ventures, LLC • PPL Canada Holdings Inc. • PPL Energy Resources, LLC • PPL Renewables, LLC 	<ul style="list-style-type: none"> • Corporate Audit Services - Indirect • Corporate Operations and Integration – Direct <ul style="list-style-type: none"> ○ Executive VP & COO ○ Utility Research & Development ○ Board Services • Direct Costs - Attributable; Book <ul style="list-style-type: none"> ○ Investor Relations ○ Enterprise Service Management Product • Corporate Operations and Integration - Indirect • Corporate Security - Direct <ul style="list-style-type: none"> ○ Board Services ○ Physical Security ○ Protection Services ○ Executive Services • Corporate Security - Indirect • Office of President – Direct: <ul style="list-style-type: none"> ○ Office Of President • Office of President - Indirect • Enterprise Security – Direct: <ul style="list-style-type: none"> ○ Cyber Security Risk Management • Enterprise Security - Indirect • Financial - Direct: <ul style="list-style-type: none"> ○ Office of President ○ Board Services ○ Financial Reporting ○ Internal Reporting ○ Utility Regulatory Reporting ○ Investor Relations ○ Investor Service Fees ○ Rating Agency ○ Billing ○ Remittance Processing ○ Cash Receipt Exception Posting Vendor Servicing (Corporate Disbursements)

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
			<ul style="list-style-type: none"> ○ Pensions Domestic Only ○ Pensions Pennsylvania Only ○ Stock Based Compensation ○ Compensation & Benefits ○ Insurance Services-General ○ Payroll Services ● Financial - Indirect ● Human Resources - Direct <ul style="list-style-type: none"> ○ All Employee Benefits ○ Corporate Human Resources Services ○ Human Resources Benchmarking ○ Employee Communications ○ Executive Services ○ Board Services ○ Employee Engagement Services ○ Talent Management and Diversity & Inclusion Services ○ Corporate Compensation and Benefit Services ○ Utility Talent Acquisition ○ Training & Development ○ Organization Development & Effectiveness ○ University Relations ○ Utility Human Resources Business Partners ○ Utility Diversity, Equity, & Inclusion ○ Human Resources Information Systems ○ Labor Relations ○ HRIS ○ Payroll ○ Employees Ratio ○ Employee Compensation ○ PPL Corporate Labor Relations ○ PPL Corporate Human Resources Business Partners ○ PPL Corporate Human Resources Strategy

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
			<ul style="list-style-type: none"> ○ PPL Corporate Human Resources Compliance ○ PPL Corporate Human Resources Operations ○ PPL Corporate Benefits ○ PPL Corporate Diversity & Inclusion ○ PPL Corporate Compensation ○ PPL Corporate Organizational Development & Effectiveness ○ PPL Corporate University Relations ○ PPL Corporate Health Services ○ PPL Corporate Talent Acquisition ○ PPL Corporate Training & Development ● Human Resources - Indirect ● Information Services - Direct <ul style="list-style-type: none"> ○ IT Tax ○ Asset Management Product ○ CaseWare Electronic Workpaper System Support ○ Controller App System Support ○ Corporate Systems Department ○ Customer Experience Product ○ Customer Systems Product ○ Cybersecurity Department ○ Cybersecurity Product ○ Data and Content Department ○ Design Department ○ Employee Experience Product ○ Engineering Product - Architecture ○ Engineering and Geospatial Product ○ Engineering Department Enterprise Service Management Product ○ Financial Systems Product ○ Gas Systems Product ○ HFM System Support Infrastructure Product – Modern Workspace ○ Infrastructure Product – Operational Systems

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
			<ul style="list-style-type: none"> ○ IT Infrastructure Department ○ Infrastructure Product - Infrastructure ○ People Systems Product Prod and Port Management Department ○ Quantum System Support ○ Smart Delivery Product ○ TRAX System Support ○ Treasury App System Support ○ UIP System Support ○ Wall Street System Support ○ Wausau System Support ○ Work Optimization Product ● Information Services – Indirect ● Office of General Counsel – Direct <ul style="list-style-type: none"> ○ Corporate Compliance ○ Annual Meeting/Proxy ○ Board Services ○ Cyber Security Risk Management ○ Pension Plan - Domestic ○ Pension Plan - PA ● Office of General Counsel - Indirect ● Public Affairs - Direct <ul style="list-style-type: none"> ○ Annual Meeting/Proxy ○ Board Services ○ Sustainability ● Public Affairs - Indirect ● PPL Services - Indirect ● Supply Chain - Direct <ul style="list-style-type: none"> ○ Supply Chain- Corporate & Electric Utilities ● Supply Chain - Indirect ● Business Services Corporate - Direct <ul style="list-style-type: none"> ○ Emergency Preparedness ● Business Services Corporate - Indirect ● Business Transformation – Direct

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
			<ul style="list-style-type: none"> ○ PA and RIE Support ● Customer Services Corporate - Direct ○ Training ○ PA and RIE Support ● Customer Services Corporate -Indirect ● Distribution - Indirect ● Facilities Corp - Direct ○ Facilities Operations ● Facilities - Indirect ● Finance & Regulatory Affairs Corporate - Direct ○ PA and RIE Support ● Finance & Regulatory Affairs Corporate - Indirect ● HR Business Partners - Direct ○ HR Business Partners Support ○ Training ● HR Business Partners - Indirect ● Operational Support - Indirect ● Transmission Services - Indirect ● Utility Communication Corporate -Direct ○ PA and RIE Support ● Utility Communication Corporate -Indirect
29	Sempra Services Corporation	<ul style="list-style-type: none"> ● Sempra Infrastructure Services Company, LLC 	<ul style="list-style-type: none"> ● No services listed.
30	Southern Company Services, Inc	<ul style="list-style-type: none"> ● The Southern Company ● Alabama Power Company ● Georgia Power Company ● Mississippi Power Company ● PowerSecure International ● Southern Communications Services, Inc. ● Southern Company Gas ● Southern Company Holdings, Inc. ● Southern Electric Generating Company ● Southern Nuclear Operating Company 	<ul style="list-style-type: none"> ● Accounting, Finance, and Treasury ● Aerial Services ● Auditing ● Executive and Corporate ● External Affairs ● Facility and Real Estate ● Generation ● Human Resources ● Information Technology ● Legal and General Counsel

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
		<ul style="list-style-type: none"> • Southern Power Company 	<ul style="list-style-type: none"> • Marketing Services • Operations • Supply Chain Management • Transmission • Environmental and Research
31	Southern Nuclear Operating Company, Inc	<ul style="list-style-type: none"> • Alabama Power Company • Georgia Power Company 	<ul style="list-style-type: none"> • Alabama Power Company and Georgia Power Company <ul style="list-style-type: none"> ○ Operating and maintenance services ○ New investment services, and ○ Fuel services at cost with respect to nuclear generating plants • Southern Nuclear corporate departments benefitting all operating plants
32	Unitil Service Corporation	<ul style="list-style-type: none"> • Unitil Energy Systems, Inc. • Fitchburg Gas and Electric Light Co. • Unitil Realty Corp. • Unitil Corporation • Northern Utilities, Inc. • Granite State Gas Transmission, Inc. 	<ul style="list-style-type: none"> • Regulatory Services • Distributed Energy Resources • Human Resources • Business Development • Finance • Information Systems • Accounting • Engineering • Energy Contracts • Financial Services • Customer Service • Operations Shared Services • Distribution Engineering • Communication • Gas Engineering • Electric Operations • Gas Operations
33	WEC Business Services LLC	<ul style="list-style-type: none"> • ATC Holding LLC • Bluewater Gas Storage, LLC • Dairyland Power Cooperative 	<ul style="list-style-type: none"> • Administrative • Communications • Customer

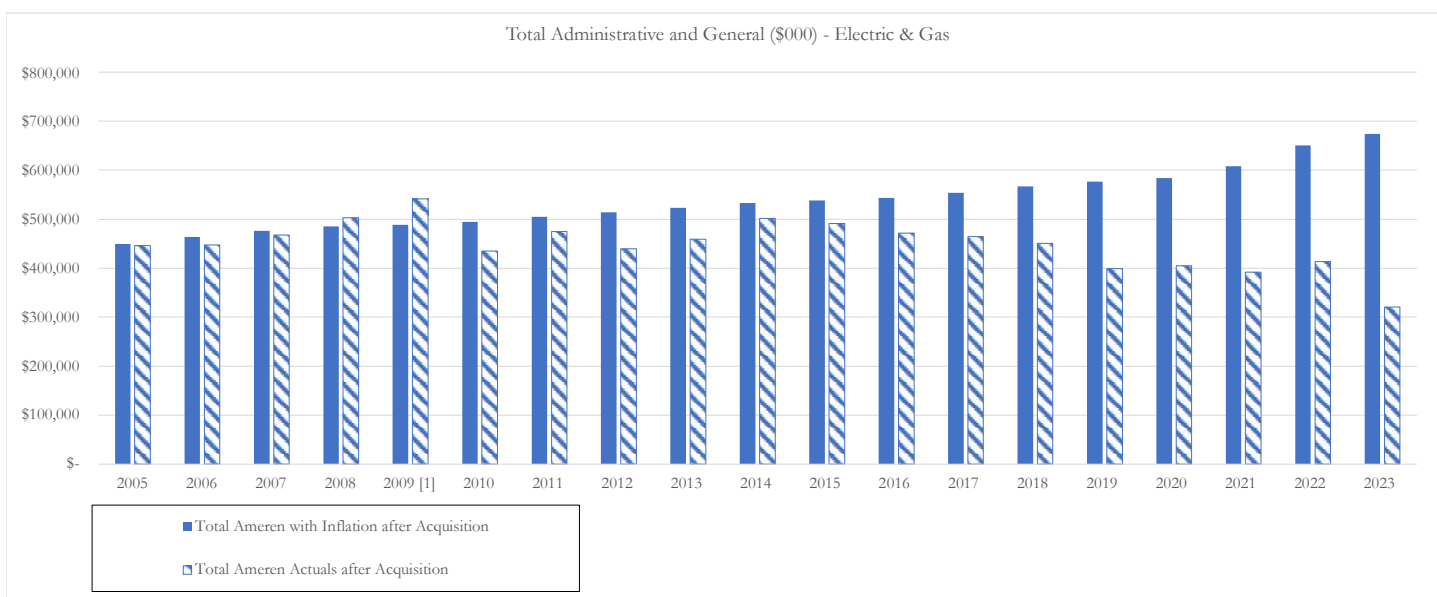
Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
		<ul style="list-style-type: none"> • Integrys Holding, Inc. • Madison Gas and Electric Company • Michigan Gas Utilities Corporation • Minnesota Energy Resources Corporation • North Shore Gas Company • Peoples Energy, LLC • The Peoples Gas Light and Coke Company • Upper Michigan Energy Resources Corporation • WEC Energy Group, Inc. • WEC Infrastructure LLC • W.E. Power, LLC • Wisconsin Electric Power Company • Wisconsin Gas LLC • Wisconsin Power and Light Company • Wisconsin Public Service Corporation • Wisconsin River Power Company • Wispark LLC • WPPI Energy • WPS Power Development, LLC 	<ul style="list-style-type: none"> • Environmental • Executive Management • External Affairs • Finance • Human Resources • Information Technology • Legal and Governance • Supply Chain • Operational Support and Development • Wholesale Energy and Fuels
34	Xcel Energy Services Inc	<ul style="list-style-type: none"> • NSP-Minnesota • PSCo • SPS • NSP-Wisconsin • Xcel Energy, Inc. • Xcel Energy Joint Ventures • Xcel Energy Nuclear Services Idaho, LLC • Nicollet Land Services, LLC • Nicollet Projects I, LLC • Nicollet Holdings Company • Eloigne Company • Xcel Energy WYCO, Inc. • Capital Services, LLC 	<ul style="list-style-type: none"> • Executive Management Services • Investor Relations • Internal Audit & Risk • Legal • Claims Services • Corporate Communications • Employee Communications • Corporate Strategy & Business Development • Government Affairs • Facilities & Real Estate • Facilities Administrative Services • Supply Chain • Supply Chain Special Programs

Line No.	Service Company	Operating Companies ¹	Services Provided by Affiliated Services Company ²
		<ul style="list-style-type: none"> • Xcel Energy Wholesale Group, Inc. • Energy Impact Fund Investments, Inc. • Xcel Energy Southwest Transmission Company, LLC • Chippewa and Flambeau Improvement Company • Xcel Energy Ventures Holdings, Inc. • 1480 Welton, Inc. • Xcel Energy Transmission Development Company, LLC • P.S.R. Investments, Inc. • WestGas Interstate, Inc. • United Power & Land Company • Clearwater Investments, Inc. • Larimer Land Services, LLC • Xcel Energy Markets Holdings, Inc. • Xcel Energy Retail Holdings Inc. • Xcel Energy Investments • e-prime, Inc. • Xcel Energy Transmission Holding Company, LLC • Xcel Energy International, Inc. • Xcel Energy Communications Group, Inc. • Quixx Corporation • Xcel Energy West Transmission Company, LLC • Xcel Energy Performance Contracting, Inc. • Seren Innovations, Inc. • Reddy Kilowatt Corporation • Nicollet Project Holdings • Xcel Energy Nuclear Services Oregon, LLC • Xcel Energy Ventures, Inc. • Xcel Energy Nuclear Services Holdings, LLC • NSP Lands, Inc. 	<ul style="list-style-type: none"> • Human Resources • Finance & Treasury • Accounting, Financial Reporting & Taxes • Payment & Reporting • Receipts Processing • Payroll • Rates & Regulation • Environmental Services & System Planning • Energy Supply Business Resources • Energy Markets Regulated Trading & Marketing • Energy Markets - Fuel Procurement • Energy Delivery Marketing • Energy Delivery Construction, Operations & Maintenance (COM) • Energy Delivery Engineering/Design • Marketing & Sales • Customer Service • Business Systems & Innovation • Aviation Services • Fleet

Administrative and General Expense Detailed Analysis

Total Administrative and General (\$000) - Electric & Gas

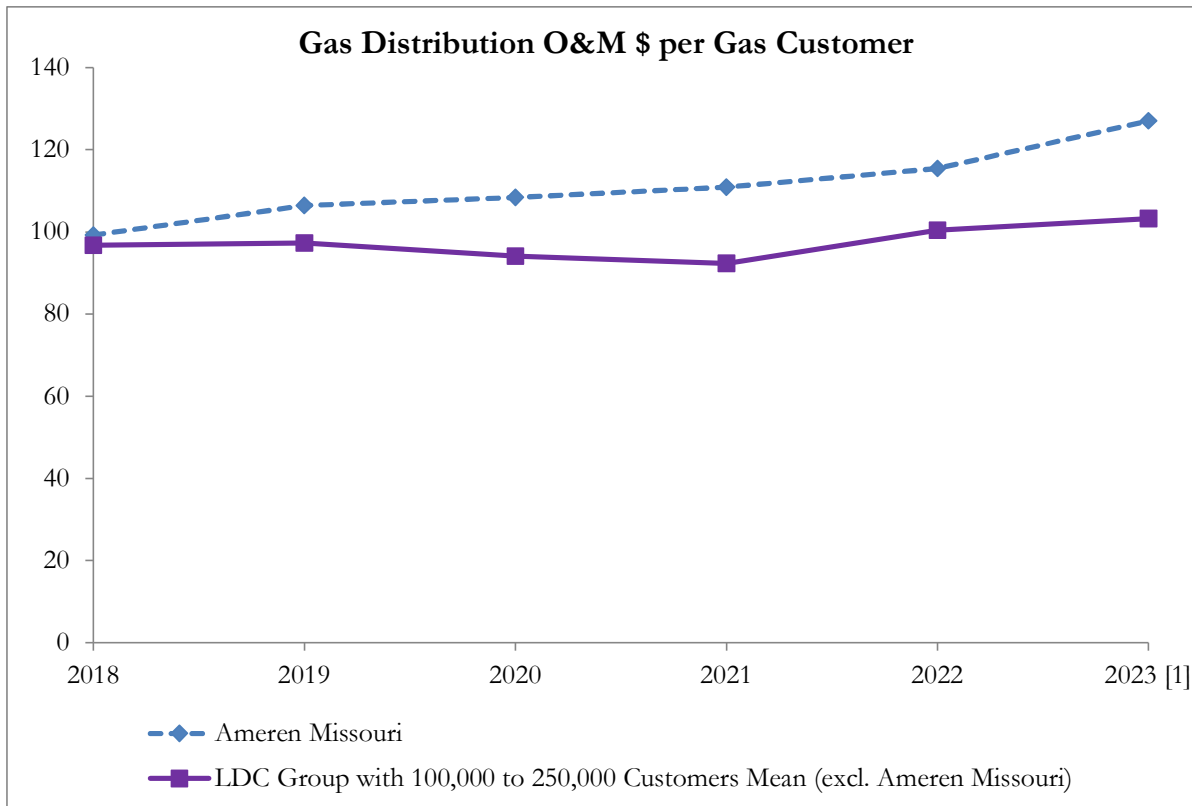
Inflated after Acquisition																			
	2005	2006	2007	2008	2009 [1]	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Union Electric	241,726	249,192	255,924	260,854	262,512	265,658	271,182	276,259	281,090	286,342	289,218	292,111	297,650	304,764	310,216	313,926	326,935	349,669	362,414
CIPS (merger completed 12/31/1997)	88,809	91,552	94,025	95,837	96,446	97,602	99,631	101,496	103,271	105,201	106,257	107,320	109,355	111,969	113,972	115,335	120,114	128,467	133,149
CILCO (acquisition closed 1/31/2003)	43,517	44,861	46,073	46,961	47,259	47,825	48,820	49,734	50,604	51,549	52,067	52,588	53,585	54,865	55,847	56,515	58,857	62,951	65,245
IP (acquisition closed 9/30/2004)	75,687	78,024	80,132	81,676	82,195	83,180	84,910	86,499	88,012	89,656	90,557	91,463	93,197	95,425	97,132	98,293	102,366	109,482	113,473
Total Ameren with Inflation after Acquisition	449,738	463,629	476,155	485,327	488,413	494,266	504,543	513,988	522,978	532,749	538,099	543,482	553,788	567,023	577,167	584,069	608,273	650,569	674,281
Actuals																			
Union Electric	254,973	256,954	277,830	287,277	264,640	254,270	286,445	248,338	263,393	292,458	279,072	266,272	249,866	250,947	228,596	217,224	207,215	246,916	204,663
CIPS (merger completed 12/31/1997)	51,843	53,518	56,330	61,046	51,469														
CILCO (acquisition closed 1/31/2003)	51,249	44,291	46,156	40,967	119,443														
IP (acquisition closed 9/30/2004)	88,173	92,427	87,651	113,631	106,127														
Ameren Illinois						180,553	188,614	191,583	195,831	209,237	212,442	205,303	214,495	200,136	170,475	187,666	184,578	166,508	116,369
Total Ameren Actuals after Acquisition	446,238	447,190	467,967	502,921	541,679	434,823	475,059	439,921	459,224	501,695	491,514	471,575	464,361	451,083	399,071	404,890	391,793	413,424	321,032



NOTES

[1] Amount for CILCO in 2009 ties to the Form 1 which includes \$57,483 of intercompany billings recorded in account 921. In the Company's filing in Docket #12-0001, that amount was excluded.

LDC Group with 100,000 to 250,000 Customers

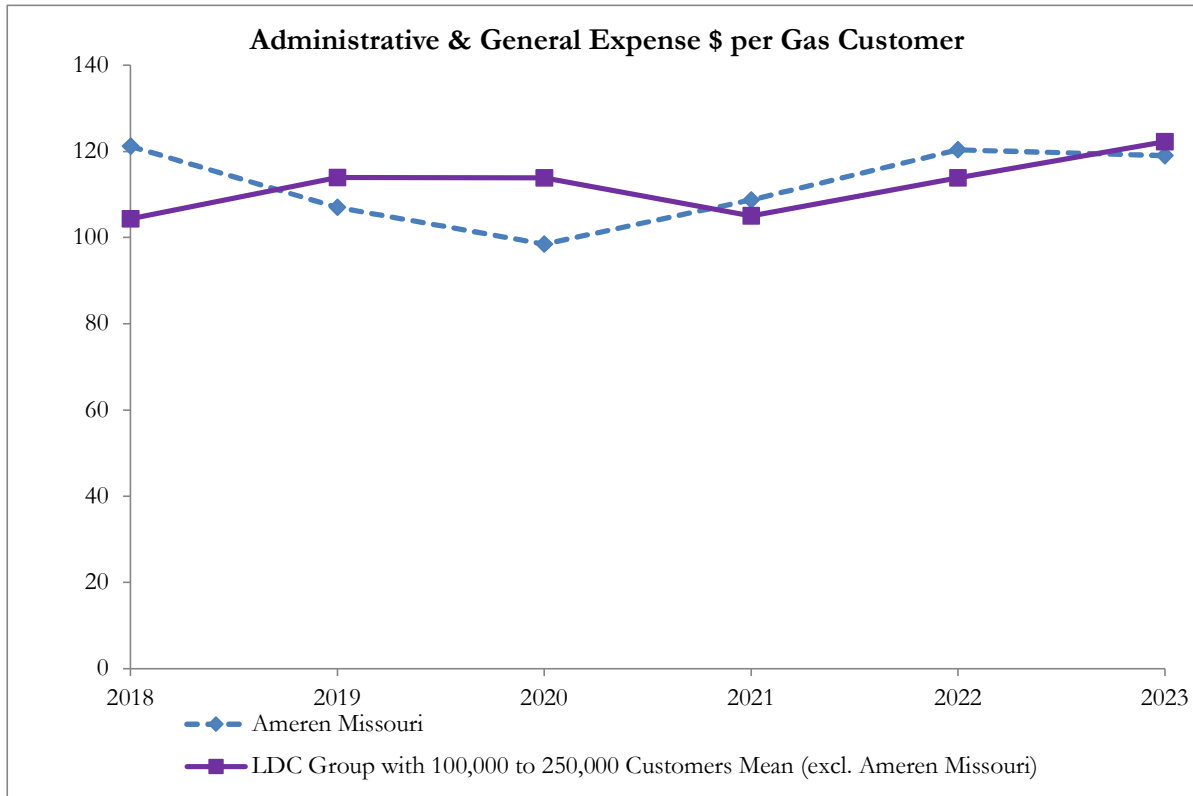


Gas Distribution O&M per Customer						
Annual Values						
	2018	2019	2020	2021	2022	2023 [1]
Ameren Missouri	99	106	108	111	115	127
LDC Group with 100,000 to 250,000 Customers Mean (excl. Ameren Missouri)	97	97	94	92	100	103
Rankings						
	2018	2019	2020	2021	2022	2023
LDC Group with 100,000 to 250,000 Customers						
Ameren Missouri	24	26	25	26	23	17
Quartile	3	4	4	4	4	4
Total Ranked	36	34	33	33	30	22

Notes

[1] Total natural gas customer data for 2023 are currently unavailable on S&P, so 2022 figures were used for the analysis.

LDC Group with 100,000 to 250,000 Customers



Administrative & General Expense \$ per Gas Customer						
Annual Values						
	2018	2019	2020	2021	2022	2023 ^[1]
Ameren Missouri	121	107	98	109	120	119
LDC Group with 100,000 to 250,000 Customers Mean (excl. Ameren Missouri)	104	114	114	105	114	122
Rankings						
	2018	2019	2020	2021	2022	2023
LDC Group with 100,000 to 250,000 Customers						
Ameren Missouri	24	18	13	19	15	10
Quartile	3	3	2	3	2	2
Total Ranked	37	35	34	34	31	23

Notes

[1] Total natural gas customer data for 2023 are currently unavailable on S&P, so 2022 figures were used for the analysis.

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

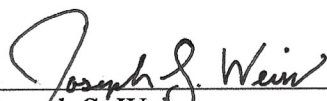
In the Matter of Union Electric Company d/b/a)
Ameren Missouri's Tariffs to Adjust Its) File No.: GR-2024-0369
Revenues for Natural Gas Service.)

AFFIDAVIT OF JOSEPH S. WEISS

STATE OF MISSOURI)
) ss
CITY OF ST. LOUIS)

Joseph S. Weiss, being first duly sworn on his oath, states:

My name is Joseph S. Weiss, and hereby declare on oath that I am of sound mind and lawful age; that I have prepared the foregoing *Direct Testimony*; and further, under the penalty of perjury, that the same is true and correct to the best of my knowledge and belief.



Joseph S. Weiss

Sworn to me this 23rd day of September, 2024.