

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

In the Matter of Union Electric Company d/b/a Ameren Missouri's Cost Allocation Manual (CAM).

**File No. EO-2017-0176**

## STATUS REPORT

**COME NOW** the Staff of the Missouri Public Service Commission (“Staff”) and Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”), (collectively “the Parties”), by and through counsel, and hereby file their *Status Report* pursuant to the Commission’s August 2, 2021, *Order Directing the Parties File a Status Report*. In support thereof, the Parties state as follows:

1. No further progress has occurred in this Cost Allocation Manual (“CAM”) proceeding, or the Affiliate Transaction Rule workshop docket, File No. AW-2020-0394 since the Parties’ last Status Report. However, the Parties continue to agree that future progress in this CAM proceeding will be greatly impacted by the potential promulgation of new affiliate transaction rules, and thus recommend the Commission continue the stay of these proceedings. The Parties also note that Ameren Missouri, in Case No. ER-2019-0335, agreed to file or provide (concurrently with its provision of direct case workpapers) the following items with regard to affiliate transactions in its next general rate proceeding:<sup>1</sup>

i. The total amount of affiliate transactions charges to Ameren Missouri and affiliate transaction charges by Ameren Missouri to an affiliate in the test year, by account and affiliate.

<sup>1</sup> See *Second Non-Unanimous Stipulation and Agreement*, Case No. ER-2019-0335, Filed March 9, 2020, EFIS Item 236; *Order Approving Stipulations and Agreements*, Case No. ER-2019-0335, Issued March 18, 2020, EFIS Item 248.

ii. The Fully Distributed Cost Study (the “FDC Study”) being conducted as agreed upon with the Staff as provided in the *Non-Unanimous Stipulation and Agreement* submitted in File No. EO-2017-0176 (the “EO-2017-0176 Stipulation”).

iii. To the extent the FDC Study did not study the fully distributed cost of Ameren Missouri to itself perform a function currently performed by Ameren Services Company (“AMS”) (legal, human resources, accounting, etc.), and only studied costs to AMS, a detailed explanation for each function that demonstrates why an FDC study for Ameren Missouri is not necessary or reasonable.

iv. Where benchmarking is used to assess AMS costs: (1) a detailed description of how Ameren performed or obtained its benchmarking; (2) identification of all benchmarking results and any steps taken to address the results; and (3) all associated AMS or Ameren Missouri work-papers and supporting documents.

v. Identification of all affiliate transaction costs in the test year that were incurred by Ameren Missouri following a request for proposal issued by or on Ameren Missouri’s behalf and receipt of bids.

vi. Identification of all affiliate transaction costs in the test year that were incurred by Ameren Missouri without a request for proposal issued by or on Ameren Missouri’s behalf and receipt of bids, and an explanation of why competitive bidding was not necessary.

vii. Identification of Ameren Corporation board of director and investor relations costs being charged to Ameren Missouri through an allocation process, and a detailed explanation of the allocation factors or process by which the charges are allocated to Ameren Missouri.

viii. The General Office Building space study as provided for in the EO-2017-0176 Stipulation.

ix. Year-end Ameren Missouri and AMS employee organization charts showing all positions at year end 2019, it being agreed that the “organization charts” can consist of a spreadsheet listing all such employees and their titles, by employer;

2. On March 31, 2021, Ameren filed tariffs designed to increase its gross annual electric revenues by approximately \$299 million, and gross annual natural gas service revenues by approximately \$9.4 million, along with supporting direct testimonies for each.<sup>2</sup> Information relating to the above listed items was either included within Ameren’s

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<sup>2</sup> See Case Nos. ER-2021-0240 and GR-2021-0241.

direct testimonies or provided to parties with Ameren's workpapers for Case Nos. ER-2021-0240 and GR-2021-0241.

**WHEREFORE**, Staff and Ameren Missouri pray the Commission will accept their February 1, 2022, *Status Report*.

Respectfully submitted,

/s/ Kevin A. Thompson  
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### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all counsel of record on this 31<sup>st</sup> day of Januar, 2022..

/s/ Kevin A. Thompson