

Exhibit No.:
Issue(s): Membership Dues
Witness: Charles Steib
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Union Electric Company
File No.: ER-2024-0319
Date Testimony Prepared: January 17, 2025

MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. ER-2024-0319

REBUTTAL TESTIMONY

OF

CHARLES STEIB

ON

BEHALF OF

UNION ELECTRIC COMPANY

D/B/A AMEREN MISSOURI

**St. Louis, Missouri
January 2025**

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REBUTTAL TESTIMONY

OF

CHARLES STEIB

FILE NO. ER-2024-0319

1 **I. INTRODUCTION**

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

3 A. My name is Charles Steib. My business address is One Ameren Plaza, 1901
4 Chouteau Ave., St. Louis, Missouri.

5 **Q. By whom are you employed and what is your position?**

6 A. I am employed by Ameren Missouri as a Senior Finance Regulatory
7 Specialist.

8 **Q. Please describe your educational background and employment
9 experience.**

10 A. I received a Bachelor of Science in Business Administration in 2001 and a
11 Master's in Business Administration in 2009 from the University of Missouri – St. Louis.
12 I am a licensed Certified Public Accountant in the State of Missouri. I started my
13 employment at Ameren Services in November 2001 in the Customer Accounts department.
14 From 2003 to 2007, I worked in the Treasury department. In 2007, I joined the Ameren
15 Services Controller's function, and from 2007 to 2017, I worked in the Plant Accounting
16 department. From 2017 to 2020, I worked in the General Accounting department. From
17 2020 to present, I have been working for Ameren Missouri in the Regulatory Accounting
18 department. My primary duties and responsibilities include preparation of the revenue

1 requirement for Ameren Missouri rate filings, preparation of other regulatory filings as
2 required by Ameren Missouri and providing any related analysis as required.

3 **II. PURPOSE OF TESTIMONY**

4 **Q. To what testimony or issues are you responding?**

5 A. I am responding to Staff witness Blair Hardin's testimony on Dues and
6 Donations.

7 **III. MEMBERSHIP DUES**

8 **Q. Please summarize Staff's adjustment to the Company's revenue**
9 **requirement to remove certain membership dues.**

10 A. Staff witness Hardin is recommending disallowance of \$828,954 of
11 membership dues expenses from the Company's revenue requirement. Included in this
12 total are \$476,211 of Greater St. Louis Inc. (GSLI) dues, \$224,325 of Edison Electric
13 Institute (EEI) dues, \$63,311 of Utility Water Act Group (UWAG) dues, and \$65,107 in
14 other miscellaneous dues and expenses.

15 **Q. Are there memberships Ms. Hardin identified that the Company agrees**
16 **should be excluded from the revenue requirement?**

17 A. Yes. The Company reviewed all vendors identified by Staff witness Hardin
18 in her adjustment and agrees that it is appropriate to remove \$3,785 of Chamber of
19 Commerce dues itemized in Ms. Hardin's adjustment. The Company disagrees with the
20 remainder of Ms. Hardin's proposed disallowance.

21 **Q. Did Staff witness Hardin give a reason as to why these specific**
22 **membership dues should be excluded?**

1 A. In her direct testimony, witness Hardin states that dues related to EEI,
2 UWAG and GSLI were removed "due to their lobbying affiliations". Later in my
3 testimony, I will show that the Company has already reviewed the invoices of these
4 organizations and removed the portion of these membership dues related to lobbying
5 activities from its revenue requirement. Witness Hardin also states that Staff disallowed all
6 test year donations, claiming that donations are considered to be an involuntary cost on
7 behalf of customers. Furthermore, she states that donations are not necessary for the
8 provision of safe and adequate service at just and reasonable rates. I will further show that
9 none of the expenses in Staff's adjustment are donations and that to the contrary, all
10 membership dues costs Ms. Hardin has recommended for disallowance do in fact benefit
11 customers.

12 **Q. Turning to the specific organizations at question, what is Greater St.**
13 **Louis Inc.?**

14 A. GSLI is a nonprofit economic development organization comprised of
15 businesses, institutions and organizations of all sizes that reflect the full diversity of the St.
16 Louis business community. GSLI represents a best-in-class, evidence-based framework to
17 align, structure, and invest significant resources to create a St. Louis economy that is both
18 more competitive and more inclusive. By working collaboratively, GSLI and its members
19 work to build regional capacity to create high-quality jobs and drive economic
20 development in the St. Louis community, with a focus on long-term growth and to have
21 the greatest collective community impact.

22 **Q. Why did Staff propose a disallowance of the membership dues for**
23 **GSLI?**

1 A. Witness Hardin proposed a disallowance for GSLI dues "due to their
2 lobbying affiliations".

3 **Q. Does GSLI engage in any lobbying activity that might be properly**
4 **disallowed?**

5 A. Yes. GSLI is required by federal tax law and regulations to specify the
6 extent of its lobbying activities.¹ This specification is made under the penalty of perjury.
7 To meet that requirement, GSLI reports to the IRS that 6.5% of its dues go to pay lobbying
8 and political activities. Ameren Missouri excluded this amount from the test year revenue
9 requirement in its direct filing. There is no evidence that any part of the dues Staff seeks to
10 disallow related to "lobbying affiliations" and in fact there is specific evidence to the
11 contrary.

12 **Q. Do Ameren Missouri's customers benefit from Ameren Missouri's**
13 **membership in GSLI?**

14 A. Yes. The health and vitality of service area communities is critical to
15 Ameren Missouri. As a corporate leader in the state of Missouri, Ameren Missouri
16 frequently works in partnership with economic development agencies such as GSLI to
17 support initiatives aimed at workforce attraction, educational attainment, economic and
18 community development and community inclusion. Such interface is in keeping with
19 community stewardship, promotion of rate stability through economic development
20 (including economic development that leads to additional sales over which to spread the
21 Company's fixed costs), diversity, equity and inclusion, and the attraction of talent for

¹ I.R.C. § 6033(e)

Rebuttal Testimony of
Charles Steib

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1 Many of these activities created incremental loads over which Ameren Missouri is able
2 to spread its fixed costs of providing service, which benefits all customers.

3 **Q. Please summarize why the Commission should reflect approximately**
4 **\$476,211 of GSLI dues in the Company's revenue requirement?**

5 A. The Commission should allow recovery of the Company's GSLI dues
6 because the dues in question are not related to lobbying, and membership provides support
7 for economic development within the communities Ameren Missouri operates. As I just
8 demonstrated, GSLI's initiatives have resulted in thousands of new jobs and over two and
9 a half billion dollars of investment in new business in Ameren Missouri's operating territory
10 and has created incremental loads over which Ameren Missouri's fixed costs can be spread.
11 Additionally, membership allows Ameren Missouri to attract top talent in its service
12 territory as well as a diverse and inclusive workforce that is representative of the
13 community which it serves. These are all benefits to Ameren Missouri customers.

14 **Q. What is EEI?**

15 A. The Edison Electric Institute (EEI) is an association of U.S. investor-owned
16 electric companies. Company witness Laura Moore provided direct testimony describing
17 the purpose of EEI and the extensive benefits this membership provides to the Company
18 and our customers.

19 **Q. Why did Staff propose a disallowance of the membership dues for EEI?**

20 A. Witness Hardin proposed a disallowance for EEI dues "due to their lobbying
21 affiliations".

22 **Q. Does EEI engage in any lobbying activity that might be properly**
23 **disallowed?**

1 A. Yes. As discussed above in relation to the Company's GSLI dues, EEI is
2 also required to report that part of its dues go to lobbying activities. EEI's IRS-required
3 report indicates that 13.5% of its dues go to pay lobbying and political activities. Ameren
4 Missouri excluded this amount from the test year revenue requirement in its direct filing.

5 **Q. Why should the Commission reflect approximately \$224,325 of EEI**
6 **dues in the Company's revenue requirement?**

7 A. The Commission should allow recovery of the Company's EEI dues for the
8 extensive benefits that its membership provides to the Company and our customers as
9 outlined in Company witness Laura Moore's direct testimony. Staff's reason for
10 disallowance of EEI dues is for its "lobbying affiliations". Staff takes no exception to the
11 substantial benefits resulting from EEI that Ms. Moore detailed in her direct testimony. The
12 Company has addressed Staff's concerns around lobbying by properly excluding the
13 portion of dues associated with lobbying.

14 **Q. What is UWAG?**

15 A. The UWAG is a voluntary, ad hoc, non-profit, unincorporated group of
16 individual electric power generation and/or transmission and distribution companies and
17 three national industry trade associations – EEI, the National Rural Electric Cooperative
18 Association ("NRECA"), and the American Public Power Association ("APPA"). UWAG
19 was formed to obtain legal advice and representation on regulatory matters arising under
20 the Clean Water Act ("CWA") and other relevant statutes addressing water-related issues.
21 UWAG advocates on behalf of its members on regulatory matters under the CWA. By
22 tracking all stages of key federal rulemakings and litigation and certain state rulemakings,
23 UWAG provides members with timely information they can then use in permitting and

1 interpretation of regulations as well as in working with their states to implement major
2 United States Environmental Protection Agency ("EPA") initiatives under the CWA.
3 UWAG also responds to individual members' questions about the scope and content of
4 CWA rulemakings and litigation. UWAG provides additional support to members by
5 providing technical and legal expertise in a cost-effective manner.

6 UWAG's overall goal is to advance cost-effective and flexible CWA policies that
7 protect human health and the environment while assuring reliable electric power supplies.
8 It does so by advocating on legal issues and related policy, scientific, and technical matters
9 arising from water-related regulations, policies, and guidance affecting electricity
10 generation, transmission, and distribution facilities. UWAG coordinates closely with EEI,
11 APPA, NRECA, the Electric Power Research Institute ("EPRI"), and other utility and
12 industry groups in areas of common interest.

13 The UWAG group's charter *prohibits any legislative lobbying activities*. UWAG
14 informs, evaluates, and represents the interests of the membership in matters primarily
15 relating to rulemakings and policies of the EPA and the United States Army Corps of
16 Engineers ("USACE") under the CWA. Advocacy before other federal agencies or state
17 authorities also is considered at the request of members or as they relate to the CWA.
18 UWAG advocates on behalf of its membership by fostering constructive working
19 relationships with agencies, industry trade associations, and other advocacy groups.
20 Specific activities to support this purpose include providing legal and related factual,
21 technical, and policy comments on proposed regulations and emerging issues; providing
22 member education on emerging issues through workshops and conference calls, as needed;
23 engaging in litigation over rulemakings or decisions by EPA, USACE, or other federal or

1 state regulators when deemed critical to the interests of UWAG members; and providing
2 members with up-to-date information about CWA compliance.

3 In response to Staff DR 237, which is attached to my testimony as Schedule CLS-
4 R1, the Company has provided a detailed listing of the many services that UWAG has
5 provided during the 12 months ending December 31, 2023. It is obvious that the Company
6 must plan for and comply with the many water-related regulations that impact its business,
7 and it is equally obvious that the services UWAG provides benefit the Company and,
8 consequently, its customers. The dues paid to UWAG during the test year of \$63,311 are
9 less than the average salary of one full time employee. Although, quantifying the cost that
10 Ameren Missouri would have to pay on the open market for the benefits provided by
11 UWAG membership would not be easy, it is reasonable to conclude that the cost would be
12 far greater than \$63,311. This cost should be included in the Company's revenue
13 requirement.

14 **Q. You mentioned that Staff also proposed to disallow \$61,322 in other**
15 **miscellaneous dues and expenses. Did Staff indicate in testimony why it disallowed**
16 **these expenses specifically?**

17 A. Staff witness Hardin did not indicate in testimony the specific reason for
18 disallowing any of these expenses, only the general statements I mentioned previously.

19 **Q. Were there any donations included in the \$61,322 of expenses**
20 **previously mentioned?**

21 A. No. The Company has reviewed the list of expenses identified by Staff and
22 the list consists of a combination of consulting expenses, memberships and fees for
23 business and professional organizations and other employee expenses.

1 **Q. Why should the remaining \$61,322 of miscellaneous dues and other**
2 **expenses be included in the Company's revenue requirement?**

3 A. First, Staff has not articulated any reason, let alone a valid reason, why these
4 costs should not be recoverable. In the absence of such a reason, the Commission should
5 find these expenses prudent and necessary and allow them to be recovered in the
6 Company's revenue requirement. Aside from that fact, these miscellaneous dues and other
7 expenses were prudently incurred and benefit customers. Included in Staff's proposed
8 adjustment is a \$25,000 invoice to Innovative Design Edge LLC. The expenses are business
9 consulting fees assisting the Economic Development and Community Relations team in
10 developing strategic plans and related research to create mutually beneficial goals centered
11 on community needs. The Economic Development and Community Relations team is the
12 direct communication link between Ameren Missouri and key community stakeholders
13 including government leaders, community members, institutions, environmental groups,
14 the business community, and our customers, primarily in metro St. Louis. Having a strong
15 strategic plan is important to consider how best to effectively engage these groups, and
16 better assist outreach to help communities in need. The group ensures that they are well
17 informed as well as heard by creating a two-way communication channel and addressing
18 community needs as they arise. As a result, these costs should be included in the Company's
19 revenue requirement. Also included are memberships and fees for business and
20 professional organizations. One example are annual dues of \$2,000 for the National
21 Registry of Radiation Protection Technologists (NRRPT) for the Company's employees at
22 the Callaway Energy Center. Memberships to industry organizations such as the NRRPT
23 provide education, training and industry resources to employees, benefiting customers by

1 creating a higher skilled and better-informed workforce. Finally, Staff's proposed
2 adjustment included a small amount of employee expenses for outings to sporting events.
3 These types of Company outings are an occasional reward to employees for a job well done
4 and build comradery between work groups. They are common among all types of
5 employers and provide an incentive for employees. Having a highly talented and stable
6 workforce is critical to optimizing the efficiency by which Ameren Missouri runs its
7 business. Furthermore, the lower turnover rates that come with a workforce that is highly
8 skilled results in lower training and recruitment costs. These are all benefits to customers.

9 **Q. Does this conclude your rebuttal testimony?**

10 A. Yes, it does.

Ameren Missouri's
Response to MPSC Data Request - MPSC
ER-2024-0319

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues
for Electric Service

No.: MPSC 0237

For the following groups, and any other similar type of group not listed, please provide the “yearbook” and all other documentation that Ameren Corporation, Ameren Missouri and Ameren Services Company has access to and/or possesses that summarizes the group’s activities, projects, and accomplishments that occurred during the period covering January 1, 2023 through December 31, 2024 (updating when available): a) Edison Electric Institute, b) Utility Water Act Group (UWAG), c) Utility Solid Waste Activities Group (USWAG), d) Utility Air Regulatory Group (UARG), e) Midwest Ozone Group, f) Illinois Energy Regulatory Group (IERG) and g) Regulatory Environmental Group of Missouri (REGFORM) . This documentation should include descriptions of the activities in both the governmental relations/lobbying and non-lobbying areas. Provide all documentation that addresses the referenced time period above.

RESPONSE

Prepared By: Craig J. Giesmann
Title: Director, Environmental Services
Date: 8-5-2024

- a) Edison Electric Institute – see attached file. Please also refer to the direct testimony of Laura Moore filed in this docket.
- b) Utility Water Act Group (UWAG) – see attached file

The Utility Water Act Group (UWAG) is a voluntary, *ad hoc*, non-profit, unincorporated group of about 160 individual electric power generation and/or transmission and distribution companies and national industry trade associations – the National Rural Electric Cooperative Association (NRECA), and the American Public Power Association (APPA). UWAG was formed in 1973 to obtain legal advice and representation on regulatory matters arising under the Clean Water Act (CWA) and other relevant statutes including, but not limited to, the Safe Drinking Water Act, the Endangered Species Act (ESA) and other species’ protection laws, and the National Environmental Policy Act. UWAG advocates on behalf of its members on regulatory matters under or associated with the CWA and, when necessary, pursues litigation relating to those matters.

UWAG's overall purpose is to ensure that CWA programs are carried out in a manner that protects human health and the environment while assuring a reliable and affordable electric power generation, transmission, and distribution system. It does so by advocating on legal issues and related policy, scientific, and technical matters arising from U.S. water-related regulations, policies, and guidance affecting electricity generation, transmission, and distribution infrastructure. UWAG coordinates closely, and may coordinate advocacy efforts, with EEI, APPA, NRECA, the Electric Power Research Institute (EPRI), the Federal Water Quality Coalition (FWQC), the Cooling Water Intake Structure Coalition (CWISC), the Waters Advocacy Coalition (WAC) the Energy and Wildlife Action Coalition (EWAC) and other utility and industry groups in areas of common interest. In addition, UWAG counsel addresses compliance issues of interest to the group.

UWAG responds to and aids in the development of rulemakings, guidance, and policy by the United States Environmental Protection Agency (EPA) and the United States Army Corps of Engineers (USACE) under the CWA. Advocacy related to the CWA before other federal agencies or state authorities also is considered at the request of members and in consultation with other industry-supported groups. UWAG litigates such rulemakings and policy when necessary and tracks and interprets legislative activities that potentially impact water policy and regulation. UWAG does not lobby Congress; however, with the concurrence of the membership, it may provide consultation in support of the policy and legislative efforts of association members (APPA and NRECA).

Of specific value to Ameren Missouri and its customers are the cost effective resources that are available as a result of Ameren participation in this group. Ameren has access to both legal and technical resources with specific expertise in water quality and natural resources issues that would be much more expensive if Ameren acquired the resources independently. The resources made available by membership in this group are utilized as an extension of Ameren staff. This group engages in rulemakings and – if necessary – litigation on behalf of its members. By tracking all stages of key federal rulemakings and litigation, this group provides Ameren with timely information that Ameren staff can then use in planning and interpretation of regulations as well as in working with the state and local agencies and stakeholders to implement major EPA initiatives in a timely, environmentally responsible and cost effective manner. The group is also able to provide expert technical resources in the form of written reports which we rely on in for support in rulemaking activities as well as developing and implementing compliance strategies.

- c) Utility Solid Waste Activities Group (USWAG) - see attached file.
USWAG is responsible for addressing waste, byproduct and chemical management and transportation issues on behalf of the utility industry. Formed in 1978, USWAG members include over 130 utility operating companies, power producers, energy companies and industry associations, including the National Rural Electric Cooperative Association (NRECA), the American Public Power Association (APPA), and the American Gas Association (AGA).

USWAG's core mission is to support the industry's efforts to comply with federal environmental regulations, protect the environment and serve its customers. As part of that effort, USWAG engages in regulatory advocacy, regulatory analysis and compliance assistance, and information exchange pertaining to RCRA, TSCA, and HMTA.

USWAG provides updates on federal and state actions related to waste management environmental issues as they develop. This information helps Ameren develop compliance strategies and take action to prepare for environmental regulations and issues that impact our industry in a proactive manner before requirements are mandatory. This enhances our ability to provide service efficiently and minimize cost impact to our customers. USWAG provides dedicated environmental and legal staff who are available to support members as well as coordinate the activities of committees on waste management related environmental topics such as coal combustion residuals (CCR), DOT Hazardous Materials Regulations, PCBs, spill response and reporting and low volume waste management. The USWAG committees provide information sharing across the industry particularly related to waste management environmental issues and challenges.

Attending the committee meetings allows Ameren Missouri co-workers to meet with others from the industry which helps us to:

- Discuss similar issues and work to develop common solutions.
- Learn from the experience of other utilities.
- Benefit from expert speakers who discuss the future of legislation/regulations.
- Share resources to gain insight on pending governmental policies and regulations more efficiently and at a lower cost than if those resources had to be duplicated.
- Collaborate on current environmental issues affecting the industry, such as: air quality regulations; water quality regulations; coal combustion residuals; climate and energy policy

Of specific value to Ameren Missouri and its customers are the cost effective resources that are available as a result of Ameren participation in this group. Ameren has access to both legal and technical resources with specific expertise in waste management that would be much more expensive if Ameren acquired the resources independently. The resources made available by membership in this group are utilized as an extension of Ameren staff. This group engages in rulemakings and – if necessary – litigation on behalf of its members. By tracking all stages of key federal rulemakings and litigation, this group provides Ameren with timely information that Ameren staff can then use in planning and interpretation of regulations as well as in working with the state and local agencies and stakeholders to implement major EPA initiatives in a timely, environmentally responsible and cost effective manner. The group is also able to provide expert technical resources in the form of written reports which we rely on in for support in rulemaking activities as well as developing and implementing compliance strategies.

- d) Utility Air Regulatory Group (UARG) – The UARG was disbanded by its members in May 2019 and the organization no longer exists.

- e) Midwest Ozone Group - see attached file.

The Midwest Ozone Group (MOG) is an affiliation of companies, trade organizations, and associations which have drawn upon their collective resources to advance the objective of seeking solutions to the development of a legally and technically sound national ambient air quality program. It is the primary goal of MOG to work with policy makers in evaluating air quality policies by encouraging the use of sound science. As members of the business community, the MOG membership also has a keen interest in assuring that policy makers are appropriately assessing the data and information required to accurately evaluate its emission control strategies. MOG is specifically committed to providing information about ground-level ozone in order to encourage sound, science-based policies for the protection of the air we breathe.

Ameren Missouri and its ratepayers benefit from the utility's participation in this organization in a variety of ways. Of specific value to Ameren Missouri and its customers are the cost effective resources that are available as a result of Ameren participation in this group. Ameren has access to both regulatory legal and technical resources with specific expertise in the air quality that would be much more expensive if Ameren acquired the resources independently. The resources made available by membership in this group are utilized as an extension of Ameren staff. This group engages in rulemakings and other environmental regulatory and stakeholder activities on behalf of its members. By tracking all stages of key state and federal rulemakings, this group provides Ameren with timely information that Ameren staff can then use in planning and interpretation of regulations as well as in working with the state and local agencies and stakeholders to implement air quality related environmental initiatives in a timely, environmentally responsible and cost effective manner. The group is also able to provide expert technical resources in the form of presentations and written reports which we rely on in for support in rulemaking activities as well as developing and implementing compliance strategies. MOG focusses on providing stakeholders with objective and technically sound information.

MOG has drafted several technical reports and comments on environmental air quality issues and rulemakings on behalf of their members that are pertinent to Ameren Missouri.

- f) Illinois Energy Regulatory Group (IERG) – see response to MPSC Data Request No.: MPSC 0193.

Ameren Missouri and its ratepayers benefit from the utility's participation in the Illinois Environmental Regulatory Group (IERG) in a variety of ways. Of specific value to Ameren Missouri and its customers are the cost effective resources that are available because of Ameren Missouri participation in this group. Ameren Missouri has access to both regulatory legal and technical resources with specific expertise in environmental areas that include air quality, land, water, climate change and environmental justice. These resources identified above would be much more expensive if Ameren acquired the resources independently. Ameren Missouri utilizes the resources made available by

membership in this group are utilized as an extension of staff expertise. This group engages in rulemakings and other environmental regulatory and stakeholder activities on behalf of its members. By tracking all stages of key state and federal rulemakings, this group provides Ameren with timely information that Ameren staff can then use in planning and interpretation of regulations as well as in working with the state and local agencies and stakeholders to implement major environmental initiatives in a timely, environmentally responsible and cost effective manner. The group is also able to provide expert technical resources in the form of written reports that we rely on in for support in rulemaking activities as well as developing and implementing compliance strategies. Ameren Missouri has facilities in Illinois that require us to stay involved with Illinois' environmental activities.

ER-2024-0319

Schedule CLS-R1

pages 20 through
26 are Confidential
in their Entirety

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