

FILED  
May 01, 2023  
Data Center  
Missouri Public  
Service Commission

# Exhibit No. 01

Commission – Exhibit 01  
Response to DR 565  
File No. ER-2022-0337

Ameren Missouri's  
Response to MPSC Data Request - MPSC  
ER-2022-0337

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

No.: MPSC 0565

(1) Mr. Hickman at pages 21-22 of his rebuttal testimony testifies “Relative to poles, the Company does recurring inspections of poles and records the results of those inspections. These inspections occur over periods of years, such that the information is never perfectly current. An attribute noted during these inspections is whether the pole has primary equipment, secondary equipment, or both.” Please describe the format in which these records are retained. (2) Please describe the extent to which these records were relied upon by Mr. Hickman in his classification of poles, including identification of the years of inspection reports utilized. (3) Mr. Hickman at pages 21 testifies “The Company cannot produce a version of accounting records with voltage information attached.” Please produce a version of operational voltage records with accounting information attached for assets recorded to distribution accounts 360-368. (4) Please confirm whether Ameren Missouri possesses records of the vintage year and location of each of the Company's approximately 900,000 poles. (5) Please confirm whether Ameren Missouri possesses a record keeping system regarding the vintage year and location of each of the Company's approximately 900,000 poles. Requested by Sarah Lange ([sarah.lange@psc.mo.gov](mailto:sarah.lange@psc.mo.gov) <<mailto:sarah.lange@psc.mo.gov>>)

**RESPONSE**

**Prepared By: Tom Hickman**  
**Title: Regulatory Rate Consultant**  
**Date: 2/24/2023**

1. The records referenced in my testimony are maintained in a database. A separate field exists for Secondary, Primary, and High Voltage (Sub Transmission). Each field is populated with a positive or negative response, positive in the event any equipment at that level of voltage is present on the pole, negative in the event no equipment at that level of voltage is present on the pole. There is no specification of the precise voltage of such equipment.

2. An earlier version of these records were relied upon in the development of the 2009 Vandas study (based on prior conversations with the individuals directly involved in the study, who have since retired), which is relied upon in the classification of poles I made in this case. My reliance on such earlier records was indirect, and the records specifically underlying that study are no longer available.

3. Company accounting records and company operational records containing voltage cannot be related. As such, the Company can provide neither accounting records with voltage attached or voltage records with accounting attached.

4. Yes. Ameren possesses such records.

5. Yes and no. Both data points exist in separate systems, but one singular system does not contain both. Our accounting records are the record keeping system that contains vintage year information. Specific location of property is not contained in our accounting records, but there is a separate operational record keeping system that contains the location associated with each pole.