

² The new Affiliate Transactions Rule took effect 30 days after it was first published in the Code of State Regulations, which occurred on April 30, 2025. Section 536.021, RSMo.

OPC to either file an agreed-upon CAM or, absent agreement, direct testimony, which would then be followed by additional rounds of testimony and a hearing to occur September 26-28, 2017.

3. The Company prepared and circulated a draft CAM as required, and several conferences were promptly held at the Commission's offices in Jefferson City to discuss it as well as to discuss related Affiliate Transactions Rule issues. By Order dated July 3, 2017, the Commission (at the parties' request) cancelled the procedural schedule, afforded the parties additional time to see if a resolution of this docket could be reached, and required the filing of a status report by October 31, 2017.

4. Thereafter, the parties continued to meet to discuss the CAM and a resolution of this docket. After these additional meetings, the Staff then filed a status report on October 31, 2017, which reflected the parties' request that they be afforded additional time for further discussions. The Commission granted that request and required that another status report be filed by March 1, 2018. The parties exchanged additional drafts of a proposed CAM that accounted for the items they had discussed in the series of meetings occurring during the preceding months, followed by the Staff's filing of a second status report on March 1, 2018. The March 1, 2018 status report indicated the Staff's recommendation that the parties continue to work together toward agreement on a CAM and that another status report be required by May 31, 2018.

5. Thereafter, the parties met again and continued to exchange information and drafts. On May 31, 2018, Staff filed a third status report in which it indicated that Staff and OPC were in the process of reviewing the latest draft of a proposed CAM and most appendices. The Staff further indicated that it was its opinion that the best course of action was for the parties to

continue to work toward an agreed upon CAM. The Commission extended the date for a further status report to July 31, 2018.

6. The parties met again on June 21, 2018, and continued their exchange of information and ideas clarifying and narrowing remaining issues. Ameren Missouri and Staff were by then also working on a stipulation intended to resolve this docket entirely. On July 31, 2018, Staff filed a fourth status report requesting that the Commission issue an Order directing the parties to file an agreed upon CAM with the Commission by September 30, 2018, or, alternatively, file with the Commission, by that date, a further status report respecting the progress made by the parties in this docket and a proposed revised procedural schedule to resolve any outstanding and necessary CAM issues remaining. The Commission extended the date for a further status report to October 1, 2018. On October 1, 2018, the parties filed a fifth status report with the Commission requesting that the Commission issue an Order directing the parties to file an agreed upon CAM with the Commission by October 31, 2018, and/or a recommendation of what further course of action they suggest the Commission to direct.

7. On October 31, 2018, the parties filed a sixth status report with the Commission requesting that the Commission issue an order directing the parties to file at least a non-unanimous agreed upon CAM based on the all parties' (Ameren Missouri, Staff, and the Office of the Public Counsel's) opinion that the best course of action was for all parties to continue to work at producing an agreement on a CAM and report back on November 30, 2018. The Commission granted the request by order dated November 2, 2018.

8. Staff and the Company then reached agreement on a stipulation to resolve this docket, including on a specific CAM for Ameren Missouri's operations which was based on the now-repealed version of the Affiliate Transactions Rule, and filed the same on November 30, 2018 (the "Staff/Company Stipulation").

9. The Office of the Public Counsel (“OPC”) timely lodged an objection to the Staff/Company Stipulation, a procedural schedule was put into place, and the Company and the Staff filed direct testimony on June 14, 2019.

10. On August 16, 2019, the Company and the Staff filed a joint motion asking the Commission to stay further proceedings in this case citing the existence of the then ongoing Affiliate Transactions Rule workshop docket (File No. AW-2018-0394) in which discussions were occurring about changes to the then-effective Affiliate Transaction Rule, including many of the changes the Commission ultimately adopted when it replaced the Rule earlier this year.

11. On August 23, 2019, OPC filed a reply to the request for a stay, stating that it did not object to it. On that same date, the Commission issued an order staying the proceedings and requiring the filing of periodic status reports. Since that time, the Staff has filed 13 status reports. The Company has filed its CAM, according to the terms agreed upon by the Staff and the Company, by May 15 of each year since the filing of the Staff/Company Stipulation.

II. Basis for Motion to Dismiss

12. Section (5)(B) of the new Affiliate Transaction Rule requires the Company to file a CAM for approval in its first general rate case after May 30, 2025, or within two years after the effective date. The required CAM will be developed in compliance with the *new* Affiliate Transaction Rule, which reflects material changes from the prior Affiliate Transaction Rule. The Company expects to file a general rate case in 2026 and will file the required CAM in that docket.

13. When the Company files its new CAM, it will request approval of it under the new Rule, and parties to that case, including OPC, will have a full and fair opportunity to address it via testimony or otherwise.

14. As noted, the circumstances that led to the present docket, the Staff/Company Stipulation, and the terms of the Company CAM, as filed for each of the past six-plus years, have changed because of changes to the Rule. While the Rule has changed in several ways, a key change is found in Section (F) of the new Rule relating to the joint provision of corporate support services (for the Company, by Ameren Services Company) and dealings between the Company and its Illinois Commerce Commission-regulated affiliate Ameren Illinois Company. Those changes mean that a number of variances reflected in the prior CAM filings would no longer need to apply. And those changes and other Rule changes mean that other terms of the CAM, prospectively, need to be changed to conform to and reflect the new Rule. This renders several of the key underpinnings of the Staff/Company Stipulation moot and out-of-date, and it also means that the testimony filed in this docket is similarly out-of-date and is premised on Rule terms that no longer exist or have been materially changed.

15. The foregoing facts and circumstances demonstrate that there is good cause to dismiss this docket, since its originally intended function will be fully and adequately served by proceedings that we would expect to begin next year when the Company files its updated CAM, as the new Rule requires.

16. The undersigned counsel for the Company and the Staff have been authorized by counsel for OPC to state that OPC does not oppose this Motion. Though the OPC does not oppose dismissing this case as a matter of administrative efficiency, it reserves the right to raise objections and arguments concerning Ameren Missouri's CAM and affiliate transactions in the future.

WHEREFORE, the Company and Staff respectfully request that the Commission issue its order dismissing the present docket.

Respectfully submitted,

/s/ James B. Lowery

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CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the service list of record of this case on this 3rd day of July, 2025.

James B. Lowery
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