

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

In the Matter of Union Electric Company d/b/a ) **File No. EO-2017-0176**  
Ameren Missouri's Cost Allocation Manual (CAM) )

## STATUS REPORT

**COME NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through the Staff Counsel’s Office, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”), and the Office of the Public Counsel (“Public Counsel”) (collectively “the Parties”) and hereby file their *Status Report* pursuant to the Commission’s July 31, 2020, *Order Directing the Parties File a Status Report*. In support thereof, the Parties state as follows:

1. On July 31, 2020, the Parties filed a *Status Report*, indicating that progress in the Affiliate Transaction Rule (“ATR”) workshop docket, File No. AW-2020-0394, had been significantly hindered by the ongoing COVID-19 pandemic emergency, and that the Parties continued to agree that the best course of action is to pursue updated ATRs, and continue the stay of the above-captioned proceedings.

2. At this time, the COVID-19 pandemic continues to be a significant hindrance, and no further progress has occurred in this Cost Allocation Manual (“CAM”) proceeding, or the AW-2020-0394 docket since the Parties’ last *Status Report*. 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. That being said, the Parties would note that in its most recent general rate proceeding before this Commission, Case No. ER-2019-0335, Ameren Missouri 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.
- 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;

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<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.

**WHEREFORE** Staff, Ameren Missouri, and Public Counsel pray the Commission will accept their January 29, 2021, Status Report.

Respectfully submitted,

**/s/ Mark Johnson**

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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 29<sup>th</sup> day of January 2020.

**/s/ Mark Johnson**