

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri’s Tariffs to)
Increase Its Annual Revenues for)
Electric Service.)
File No. ER-2021-0240

**MOTION TO AMEND LIST OF ISSUES AND
LATE-FILE POSITION STATEMENT**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and respectfully asks leave to late-file an additional issue and position statement that was inadvertently omitted in its previous filing:

1. Staff inadvertently omitted a portion of issue 22, sub-issue J, paragraph 3, from its list of issues and position statements.
2. With leave of the Commission, Staff would file the following as its position statement, which would not require an update to the list of witnesses or parties’ order of examination:

**22. Class Cost of Service, Revenue Allocation and Rate Design
(Electric and Gas)**

- J. Should Staff’s recommended studies and data retention measures be adopted?*
3. *Performance of a full study of the reasonableness of the calculations and assumptions underlying Rider B [1] to be filed as part of the Company’s direct filing in its next general rate case.*

Staff Position: Ameren Missouri should fully study the level of investment in customer-specific infrastructure associated with providing substations and related infrastructure to customers who receive service at Primary.²

¹ Sub-paragraph 3 of the original List of Issues also addressed a proposed Rider C study, but that has been removed pursuant to the parties’ Second Stipulation and Agreement.

² ER-2021-0240 Class Cost of Service Report page 4-5

WHEREFORE, the Staff of the Missouri Public Service Commission respectfully requests the Commission to grant leave to late-file the issue and position statement identified above.

Respectfully submitted,

/s/ Curt Stokes

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Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this 7th day of December, 2021, to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ Curt Stokes