

**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 Adjust        )  
its Revenues for Electric Service                )        **File No. ER-2021-0240**

**STAFF MOTION TO LATE-FILE SCHEDULE**

**COMES NOW** Staff of the Missouri Public Service Commission, through the undersigned counsel, and for this Motion to Late-File Schedule (“Motion”), respectfully states as follows:

1. On October 15, 2021, pursuant to the procedural schedule ordered for this case, Staff filed rebuttal testimony of several witnesses in this case, including the rebuttal testimony of Sarah L.K. Lange.

2. On page 29 of Ms. Lange’s rebuttal testimony she refers to Ameren Missouri’s response to Staff data request 533.1, and states that said response is attached to the testimony. Unfortunately, it was not attached, due at least in part to the recent Covid-19 outbreak in the Governor Office Building.

3. Attached to this Motion is a copy of the subject data request and response, which should be attached to Ms. Lange’s rebuttal testimony as Schedule SLKL-r2. Staff submits the attached as a late-filed schedule, and states that no party will be prejudiced hereby since the underlying testimony itself was timely filed.

**WHEREFORE**, Staff prays the Commission accept the attached schedule as Schedule SLKL-r2 to the rebuttal testimony of Sarah L.K. Lange.

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 18<sup>th</sup> day of October, 2021.

**/s/ Jeffrey A. Keevil**

**MISSOURI PUBLIC SERVICE COMMISSION**

**SCHEDULE SLKL-r2**

**Rebuttal Testimony of  
Sarah L.K. Lange**

**UNION ELECTRIC COMPANY,  
d/b/a Ameren Missouri**

**CASE NO. ER-2021-0240**

Ameren Missouri's  
Response to MPSC Data Request - MPSC  
ER-2021-0240

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

No.: MPSC 0533.1

Brief Description: Hickman testimony pages 10-12

Tom Hickman's testimony at page 10 is "Q. How were the customer-related costs of FERC Account 364 — poles, towers, and fixtures — determined using the minimum-size method?

A. First, the average installed book cost of the minimum height pole currently being installed for the Company's distribution system was determined through discussions with Ameren Missouri's Distribution Planning Group. Then, the average book cost was multiplied by the number of poles to find the customer-related cost component. Poles with average book cost less than the minimum height pole are included at their lower cost...."

Tom Hickman's testimony at page 11 is "Q. How were the customer-related costs of FERC Account 365 — overhead conductors and devices — determined?

A. The current minimum size conductor being installed was determined through discussions with the Distribution Planning Group. A weighted average cost of conductor was developed by including every foot of conductor with an average book cost greater than or equal to the average book cost of the minimum size conductor at the average book cost of the minimum size conductor...."

Tom Hickman's testimony at page 12 is "Q. How were the customer-related costs of FERC Accounts 366 and 367 — underground conduits, conductors and devices — determined?

A. For Account 367 (underground conductors and devices), the average minimum size underground conductor was determined through discussions with the Distribution Planning Group. A weighted average cost of conductor was developed consistent with the process described for Account 365 above...."

Tom Hickman's testimony at page 12 is "Q. How were the customer-related costs of FERC Account 368 — line transformers — determined?

A. The cost of a minimum size transformer currently being installed was determined through discussions with the Distribution Planning Group. The average cost of the minimum size

transformer was multiplied by the number of transformers in the plant account to determine the current cost of the minimum-size system...."

(1) For each account referenced by Mr. Hickman, please state the retirement unit determined to be the minimum size determined as a result of the discussion, other potential minimum sized retirement units discussed, and the parameters Mr. Hickman placed around selection of a minimum sized item, and provide all notes, presentations, documents referred to, or other documents produced or referred to in the discussion between Mr. Hickman and the Distribution Planning Group.

(2) Please identify the voltage(s) at which each retirement unit specified in (1) is (A) capable of operating, and (B) at which it predominately operates within the Ameren Missouri system

(3) Please identify by retirement unit the minimum size line transformer typically installed to serve a relatively small residential detached home customer, a relatively large residential detached home customer, a relatively medium residential detached customer; a relatively small residential multifamily customer, a relatively large residential multifamily customer; a relatively medium residential multifamily customer, a relatively small SGS customer, a relatively large SGS customer, and a relatively medium SGS customer; a relatively small LGS customer, a relatively medium LGS customer, and a relatively large LGS customer; a relatively small SPS customer, a relatively medium SPS customer, and a relatively large SPS customer; a relatively small LPS customer, a relatively medium LPS customer, and a relatively large LPS customer;

(4) Please identify by retirement unit the minimum size overhead service drop typically installed to serve a relatively small residential detached home customer, a relatively large residential detached home customer, a relatively medium residential detached customer; a relatively small residential multifamily customer, a relatively large residential multifamily customer; a relatively medium residential multifamily customer, a relatively small SGS customer, a relatively large SGS customer, and a relatively medium SGS customer; a relatively small LGS customer, a relatively medium LGS customer, and a relatively large LGS customer; a relatively small SPS customer, a relatively medium SPS customer, and a relatively large SPS customer; a relatively small LPS customer, a relatively medium LPS customer, and a relatively large LPS customer; if a conductor is functionally a service drop but not recorded to the service drop account, please identify the account to which it is recorded;

(5) Please identify by retirement unit the minimum size underground service drop typically installed to serve a relatively small residential detached home customer, a relatively large residential detached home customer, a relatively medium residential detached customer; a relatively small residential multifamily customer, a relatively large residential multifamily customer; a relatively medium residential multifamily customer, a relatively small SGS customer, a relatively large SGS customer, and a relatively medium SGS customer; a relatively small LGS customer, a relatively medium LGS customer, and a relatively large LGS customer; a relatively small SPS customer, a relatively medium SPS customer, and a relatively large SPS customer; a relatively small LPS customer, a relatively medium LPS customer, and a relatively large LPS customer; please identify the account to which it is recorded;

(6) Please identify by retirement unit the minimum size transformer other than line transformer typically installed to serve a relatively small residential detached home

customer, a relatively large residential detached home customer, a relatively medium residential detached customer; a relatively small residential multifamily customer, a relatively large residential multifamily customer; a relatively medium residential multifamily customer, a relatively small SGS customer, a relatively large SGS customer, and a relatively medium SGS customer; a relatively small LGS customer, a relatively medium LGS customer, and a relatively large LGS customer; a relatively small SPS customer, a relatively medium SPS customer, and a relatively large SPS customer; a relatively small LPS customer, a relatively medium LPS customer, and a relatively large LPS customer; and identify the account to which the transformer would be booked;

(7) For items 3-6 please identify the local coincident peak kW assumed for each circumstance, and the noncoincident peak kW assumed for each circumstance. If factors other than these demand are material to the selection of installed infrastructure, please fully explain those considerations;

(8) Please identify by retirement unit the minimum size overhead conductor typically installed to provide service at each voltage at which the company provides service;

(9) Please identify by retirement unit the minimum size underground conductor typically installed to provide service at each voltage at which the company provides service;

Please identify each member of the Distribution Planning Group who participated in these discussions and the dates, times, and locations of these discussions, and which accounts were addressed by each Group member.

Data Request submitted by Sarah Lange (sarah.lange@psc.mo.gov).

## RESPONSE

**Prepared By: Tom Hickman**

**Title: Regulatory Rate Specialist**

**Date: 07/19/2021**

Subject to the Company's objections,

- (1) Mr. Hickman's informal conversations with the Distribution Planning Group were focused on reviewing the reasonableness of retirement unit selections previously made. Specific alternatives and selection parameters were not specifically a part of these conversations, as those would have been discussed at the time of the original study. The conversations included the purpose of the minimum distribution study, how it is utilized in cost of service, and whether the previously selected minimum size items were reasonable in the context of the study. There are no specific notes, presentations, or

documents from these conversations. Please see the answer to (2) for identification of specific minimum size retirement units.

(2) 364 Poles – POLE, WOOD, 40' – 240V, 480V, 4160V, 12000V, 12470V, 13200V, 13800, 25000V – Predominantly 12000V

365 Overhead Conductor & Device – WIRE, 1/0, ALUMINUM - 240V, 480V, 4160V, 12000V, 12470V, 13200V, 13800, 25000V, 34500V – Predominantly 12000V

367 Underground Conductor & Device – CABLE, 5KV, 1-2, RUBBER, CONC NEUT – 4160V

368 Line Transformers – TRANSFORMER, 0025KVA, 1PH, 7200V – 12000V

The conversations as described in (1) were held primarily with Jon Schmidt and John Crotty. Discussions were over the entire study and didn't cover a specific account. The specific dates, times, and locations of these discussions are unavailable.