

**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                         )        **Case No. ER-2022-0337**

**MOTION FOR LEAVE TO FILE  
SUPPLEMENTAL DIRECT REVENUE REQUIREMENT TESTIMONY  
AND UPDATED ACCOUNTING SCHEDULES**

**COMES NOW** Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and for its Motion for Leave to File Supplemental Direct Revenue Requirement Testimony and Updated Accounting Schedules (“Motion”), respectfully states as follows:

1. On September 28, 2022, the Commission issued an *Order Setting Procedural Schedule and Adopting Test Year* (“Order”) for this proceeding. Said Order provided for Direct Testimony (Revenue Requirement, all parties except Ameren Missouri) to be filed herein on January 10, 2023, and for Direct Testimony (Class Cost of Service & Rate Design, all parties except Ameren Missouri) to be filed on January 24, 2023.

2. Pursuant to the Order, Staff filed its revenue requirement direct testimony and accounting schedules on January 10, 2023. However, prior to filing its class cost of service and rate design direct testimony on January 24, 2023, Staff became aware of the need for correction of certain significant errors in the revenue requirement filed by Staff on January 10. Rather than file its class cost of service and rate design based on a revenue requirement with known significant errors, Staff has corrected the known significant errors and updated certain elements of the revenue requirement filed on January 10, for inclusion in its class cost of service and rate design testimony.

3. The updated/corrected revenue requirement is supported by the Supplemental Direct Testimony of Keith Majors and updated accounting schedules sponsored by Mr. Majors, both of which are being filed contemporaneously with this Motion. Staff requests leave of the Commission to file the supplemental testimony and updated accounting schedules supporting the updated/corrected revenue requirement, since it is this revenue requirement upon which Staff's class cost of service and rate design testimony is based.

4. Given that the supplemental testimony and updated accounting schedules are being filed contemporaneously with Staff's class cost of service and rate design testimony, no party will be prejudiced by granting this Motion. In fact, filing the supplemental testimony and updated accounting schedules at this time should be beneficial for the other parties, in that they will have the updated revenue requirement to which the class cost of service testimony corresponds.

**WHEREFORE**, Staff respectfully requests the Commission grant Staff leave to file the Supplemental Direct Testimony of Keith Majors and updated accounting schedules sponsored by Mr. Majors which are being filed contemporaneously with this Motion.

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 24th day of January, 2023.

**/s/ Jeffrey A. Keevil**