

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

In the Matter of the Establishment of a Working Case)
Regarding FERC Order 2222 Regarding Participation)
Of Distributed Energy Resource Aggregators in Markets) File No. EW-2021-0267
Organized by Regional Transmission Organizations)
and Independent System Operators.)

**AMEREN MISSOURI’S RESPONSE TO
ORDER REGARDING WORKSHOP**

COMES NOW Union Electric Company d/b/a Ameren Missouri (the “Company” or “Ameren Missouri”), and in response to the Commission’s June 4, 2021 *Order Regarding Workshop’s* invitation to submit questions to be addressed at the upcoming June 29, 2021 workshop session, states as follows:

1. Ameren Missouri previously provided suggestions on “how the Commission may best respond to the changes that will result from implementation of FERC Order 2222, and to review its current practices in this area” in response to the Commission’s February 24, 2021 order asking it to do so.

2. As it indicted in those suggestions, the implications of FERC Order 2222 on regional transmission organization (“RTO”) tariffs and operations as well as on its own operations and customers are multifaceted and complex, with many unknowns existing at the current time in terms of how the RTOs will implement the FERC’s order. The Company also indicated that regardless of how those RTO processes conclude, there will be significant coordination required between the RTO and distribution-level utilities, including Ameren Missouri. Significant work by the Commission will also be required, a fact which the Commission clearly recognizes as evidenced by its establishment of this docket and its continued

engagement in these issues, including through its scheduling of the upcoming workshop session on June 29.

3. With respect to suggested questions, Ameren Missouri agrees with and endorses the questions submitted today by Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West.

4. Ameren Missouri also offers the following additional questions:

- a. What time is needed post-the approval of the RTO's tariffs implementing FERC Order 2222 to allow state regulatory commissions and their utilities to update rules and tariffs so that issues like retail customer metering and data issues, distribution system infrastructure issues, cost recovery/cost causation and allocation issues, and double-counting and cost-shift issues (and other issues mentioned in Ameren Missouri's prior filing in this docket) can be properly addressed in order to avoid harm or unintended consequences to non-participating retail customers or utilities arising from aggregation activity?
- b. If it is believed that a transition period is needed, what actions should be taken to advocate for one?

5. Ameren Missouri appreciates this additional opportunity to suggest questions that it believes need to be addressed in this docket.

WHEREFORE, Ameren Missouri respectfully submits this response to the Commission's June, 4, 2021 Order.

Respectfully Submitted,

/s/ James B. Lowery

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**ATTORNEYS FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Motion was served on all parties of record in this case via electronic mail (e-mail) or via regular mail on this 16th day of June, 2021.

/s/ James B. Lowery
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