

# Exhibit No. 508

Ex 508

Ameren Missouri  
Case No. ER-2021-0240

Missouri Industrial Energy Consumers' First Set of  
Data Requests to the Missouri Public Service Commission Staff

- | <u>Item No.</u> | <u>Description</u>   |
|-----------------|--|
| 1-1.            | Please identify the Staff witness or witnesses who:<br><br>a. Are responsible for preparation of the "Staff Report Class Cost of Service," page 1 through page 69, line 13.<br><br>b. Will testify at hearing and be subject to cross-examination regarding this material.   |
| 1-2.            | For each Staff witness mentioned in response to the preceding question, please:<br><br>a. List all college level electrical engineering classes taken, the name of the institution, and the approximate date or dates on which the course was taken.<br><br>b. List all electric utilities (other than Ameren Missouri) for which the referenced Staff members have conducted an in-depth analysis of the design and operation of the distribution system and the nature and detail of records of investment and expenses that are maintained. |
| 1-3.            | Referring to Recommendation No. 4, on page 4 of the "Staff Report Class Cost of Service," please identify any differences between the billing demand provisions of Rate LPS and of Rider I.  |

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# Missouri Public Service Commission

## Respond Data Request

<b>Data Request No.</b>	0828
<b>Company Name</b>	MO PSC Staff-(All)
<b>Case/Tracking No.</b>	ER-2021-0240
<b>Date Requested</b>	9/20/2021
<b>Issue</b>	Other - Other
<b>Requested From</b>	Jeff Keevil
<b>Requested By</b>	Diana M Plescia
<b>Brief Description</b>	MIEC's First Set of Data Request to the MO Public Service Commission Staff
<b>Description</b>	See Attached
<b>Response</b>	828.1-1.a Sarah Lange 828.1-1.b Sarah Lange 828.1-2.a Sarah Lange has not taken courses specifically titled Electrical Engineering, and is without knowledge as to the extent that her coursework overlapped with those required for Electrical Engineering. Coursework includes 2014 Spring "ETST 276 Power System Economics," Fall 2014 "ENRG 420 Energy Markets and Structures," and Spring 2015 "ENRG 412 Energy Economics and Finance," completed at Bismarck State College and "TG126 70 COMP AIDED DRAFTING," and "TG100 01 INTRO TO DRAFTING," completed at Southeast Missouri State University, c. 2002-2004. 828.1-2.b b Sarah Lange has not conducted an "in-depth analysis of the design and operation of the distribution system," of Ameren Missouri nor any other electric utility. Sarah Lange has conducted similar reviews of the investment records of The Empire District Electric Company as part of its last general rate case. Sarah Lange has not conducted an analysis of the expense records of Ameren Missouri nor any other electric utility. 828.1-3 These provisions are generally similar, except that LPS requires a minimum demand of 5,000 kW at Primary Voltage, and Rider I as currently promulgated requires a minimum demand of 100kW at Secondary Voltage. To the extent that the Commission orders implementation of Staff's recommendation that Ameren Missouri require, on a non-optional basis, that non-residential customers participate in Rider I, which incorporates a time of use element to customers' billing as those customers obtain AMI metering equipment, the more specific requirement of the LPS schedule concerning minimum demands would govern, and clarifying language would be implemented as part of compliance tariffs. DR Response provided by Sarah Lange (sarah.lange@psc.mo.gov).
<b>Objections</b>	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **ER-2021-0240** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **MO PSC Staff-(All)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **MO PSC Staff-(All)** and its employees, contractors, agents or others employed by or acting in its behalf.