# BEFORE THE PUBLIC SERVICE COMMISSSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a	)	File No. EO-2017-0176
Ameren Missouri's Cost Allocation Manual (CAM)	)	

#### STAFF'S FOURTH STATUS REPORT

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), through Staff Counsel's Office, and for its Fourth Status Report submits the following. Counsel for both Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") and the Office of the Public Counsel ("Public Counsel") have authorized undersigned counsel to state that they concur in this status report. In support thereof, the Staff states as follows:

- 1. As indicated in prior Status Reports, Staff would not characterize any issue that has arisen as unresolvable, nor have the parties reached a point yet where a revised procedural schedule will be needed to resolve issues. The parties continue to resolve a number of issues and are continuing to work toward resolution of issues that remain.
- 2. The parties last met on June 21, 2018 and Ameren Missouri last submitted to Staff and Public Counsel another draft of its proposed CAM, with most Appendices, on July 9, 2018. Staff and Public Counsel because of the continuing impending dates of other Commission business are still engaged in reviewing the proposed language of the CAM and the numerous documents associated with the CAM.
- 3. Ameren Missouri and Staff continue to clarify and narrow issues. It still is Staff's opinion that the best course of action is for the parties to continue to work at producing an agreed upon CAM.

- 4. The parties suggest the Commission issue an Order directing the parties to file an agreed upon CAM with the Commission by September 30, 2018, or, alternatively, file with the Commission, by that date, a further status report respecting the progress made by the parties in this docket and a proposed revised procedural schedule to resolve any outstanding and necessary CAM issues remaining.
- 5. Proceeding in the manner suggested herein does not prejudice any party's right to (a) make a filing prior to September 30, 2018, if a party believes that sufficient progress is not being made, and a revised procedural schedule should be put in place earlier to resolve this docket or (b) submit a filing suggesting a different process post-September 30, 2018 if the party believes an alternative to putting a procedural schedule in place should be considered.
- 6. The parties previously commented that the development of a CAM is a significant undertaking for the parties. That remains true. The Staff would note that there are presently several other CAM cases pending before the Commission involving the drafting of what are intended to be Commission approved CAMs. Each CAM case is very different because, for among other reasons, the utilities involved are parts of very different corporate structures.

WHEREFORE the Staff submits its Fourth Status Report and requests that the Commission issue an Order directing the parties to file an agreed upon CAM with the Commission by September 30, 2018, or, alternatively, file with the Commission, by that date, a further status report respecting the progress made by the parties in this docket and a proposed revised procedural schedule to resolve any outstanding and necessary CAM issues remaining.

Respectfully submitted,

## /s/ Mark Johnson

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## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all counsel of record this 31st day of July, 2018.

/s/ Steven Dottheim