

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

In the Matter of Proposed Amendments of the	)	
Commission's Rules Relating to	)	Case No. OX-2026-0335
Chapter 4 - Standards of Conduct	)	

COMMENTS OF AMEREN MISSOURI

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") and respectfully submits these comments for consideration by the Missouri Public Service Commission ("Commission"):

1. On June 11, 2026, the Commission issued a *Finding of Necessity and Order Directing Proposed Amendments be Filed for Publication* regarding proposed changes to Rules 20 CSR 4240-4.010 (gratuities), 4.015 (general definitions), 4.017 (general provisions), and 4.040 (communications that are not ex parte or extra-record). On June 12, 2026, the Commission issued a *Notice of Hearing and Comment Period*, providing that comments may be submitted herein by August 14, 2026.

2. Ameren Missouri appreciates having the opportunity to participate in this rulemaking and is in support of the objective of the Commission's proposed changes, which is largely to update Chapter 4 for the current Code of State Regulations citation. Additionally, as detailed below, Ameren Missouri proposes further amendments for Rule 4.015.

3. Changes are proposed for the definition of "Commission staff," but changes are not currently proposed for the definition of "Office of the Commission." Ameren Missouri suggests that the definition of "Office of the Commission" also be revised, so that the two definitions are consistent and fit together.

4. The rulemaking proposes to define "Commission staff" as "all personnel employed by the commission whether on a permanent or contractual basis who are not members of the general

counsel division, administration division, technical advisory staff, personal advisors, or who are not law judges."

5. As such, Ameren proposes that the definition of "Office of the Commission" at Rule 4.015(10) be amended as follows (proposed new language in bold): Commissioners, a commissioner, a member of the commission's **technical** advisory staff, **personal advisors**, or the commission's regulatory law judges.

6. Additionally, Ameren proposes that the addition of a definition for "technical advisory staff" would provide clarity and assist stakeholders in complying with the Commission's Standards of Conduct rules.

7. RSMo. §386.135.1 refers to "independent technical advisory staff of up to six full-time employees," while RSMo. §386.135.2 refers to the Commissioners' personal advisors. In the Commission's online telephone directory, the personal advisors are listed with the Commissioners, making it clear that the personal advisors fall within the "Office of the Commission." It appears, however, that the technical advisory staff is listed under "Regulatory Analysis" under the General Counsel heading.

8. In Docket No. OX-2026-0334, the pending rulemaking for Chapter 3, Staff stated that the addition of "independent" before "technical advisory staff" within the exclusionary portion of the definition of "Commission staff" would improperly exclude the Bulk Regional Transmission Unit employees (would cause these employees to be classified as "staff"). It appears these employees are currently listed in the Commission's online telephone directory under the heading of "Commission," signaling that these employees, like the personal advisors, fall within the "Office of the Commission" for purposes of the communication provisions of the Commission's Standards

of Conduct rules. It is not clear, however, that these Bulk Regional Transmission Unit positions fall within the "technical advisory staff" category.

9. Ameren Missouri suggests that a definition of "technical advisory staff" be added to Rule 4.015 to clarify that "technical advisory staff" within the definitions of "Commission staff" and "Office of the Commission" includes both the technical advisory staff authorized by RSMo. §386.135.1 and the Bulk Regional Transmission Unit employees, provided that is the Commission's intent. Alternatively, if "personal advisors" is not listed separately within the definitions of "Commission staff" and "Office of the Commission," the definition of "technical advisory staff" should be added to Rule 4.015 to provide that "technical advisory staff" includes the technical advisory staff authorized by RSMo. §386.135.1, the personal advisors authorized by RSMo. §386.135.2, and the Bulk Regional Transmission Unit employees.

10. Lastly, it should be noted that the proposed definition of "Commission staff" for Chapter 4 includes the "administrative division" within the exclusionary group. The administrative division appears to include the Consumer Services employees who handle informal complaints (and informal complaints may lead to formal complaints or otherwise be at issue in a case). The communication provisions of the Commission's Standards of Conduct rules apply to parties and the office of the Commission. For Commission employees, "party" refers only to those that fall within the definition of "Commission staff." As such, the communication provisions would not apply to discussions "regarding any substantive issue in, or likely to be in, a case or noticed case" between Commissioners and others within the "Office of the Commission" and the Consumer Services employees, although the communication provisions are applicable to other parties regarding the same substantive issues.

11. As such, Ameren Missouri suggests that the proposed definition for "Commission staff" at Rule 4.015(4) be amended as follows (proposed new language in bold): all personnel employed by the commission whether on a permanent or contractual basis who are not members of the general counsel division, administration division (**excluding Consumer Services employees**), technical advisory staff, personal advisors, or who are not law judges.

WHEREFORE, Ameren Missouri respectfully requests that the Commission accept these comments and incorporate the Company's proposed amendments.

Respectfully submitted,

/s/ Diana Carter

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to the parties of record on this 13th day of August, 2026.

/s/ Diana Carter

Diana Carter