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.	)))	File No. ER-2026-0291

AMEREN MISSOURI'S RESPONSE TO OTHER PARTIES' FILINGS SEEKING ADDITIONAL LOCAL PUBLIC HEARINGS

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Company" or "Ameren Missouri"), pursuant to 20 CSR 4240-2.080(13), and for its response to filings made by the Office of the Public Counsel ("OPC") and the Consumers Council of Missouri ("CCM")[1] (collectively, the "Other Parties") asking the Commission to add additional local public hearings ("LPHs"),[2] states as follows:

1. The Joint Recommendation recommends in-person local public hearings in all major regions of the Company's service territory, in eastern Missouri (St. Charles and in or near both the City and County of St. Louis), in southeast Missouri (Cape Girardeau), and in Central Missouri (Jefferson City).[1] Additionally, the Joint Recommendation also recommends two virtual local public hearings which allow participation by customers residing *anywhere* in the state. The Joint Recommendation matches the number and type of local public hearings ordered by the Commission in the Company's previous electric rate case, File No. ER-2024-0319, and reflects one more in-person LPH than the Commission ordered in the prior Company electric rate case, File No. ER-2022-0337.

[1] And the "me too" filing from Sierra Club supporting CCM's request.
[2] The Other Parties request additional LPHs beyond the seven LPHs the Company and the Staff recommended in their Joint Proposed Local Public Hearing Schedule filed on October 9, 2026 (the "Joint Recommendation"). OPC is also a party to the Joint Recommendation but did indicate that OPC would be asking for an additional LPH.

2. The Joint Recommendation's total of five in-person and two virtual LPHs reflects the most LPHs ordered by the Commission (except for one case noted below) across the last several large utility rate cases processed by the Commission, as the following table demonstrates:

Utility	**File No.**	**In-Person**	**Virtual**
Ameren Missouri	ER-2024-0319	5	2
Liberty (Gas)	GR-2024-0106	6	2
Evergy West	ER-2024-0189	3	2
Spire	GR-2025-0107	5	2
Evergy Metro	ER-2026-0143	2	2

While the Commission ordered six in-person LPHs in the Liberty gas case, it should be kept in mind that Liberty's gas service territory literally stretches from the Missouri Illinois/Arkansas/Tennessee border in Southeast Missouri, to the Iowa/Kansas/Nebraska border in Northwest Missouri, and to the Iowa/Illinois Border in Northeast Missouri, and even then, the total LPHs were just one more than reflected in the Joint Recommendation in this case. With the exception of one very small pocket of load in Northwest Missouri (an area where prior LPHs that had been held there were generally poorly attended), Ameren Missouri's service territory comes nowhere close to spanning almost literally the entire footprint of the State, as is the case for Liberty's gas operations.

3. Despite the Joint Recommendation's complete consistency with the Commission's LPH order in the Company's last rate case and the Commission's other recent LPH orders discussed above, OPC seeks to increase the number of in-person LPHs to six. Moreover, CCM seeks to increase the number of in-person LPHs to seven. Both requests should be denied.

4. OPC requests that an additional LPH be scheduled in Festus, Missouri, arguing that

"this is the first general rate case following the Commission's consideration …" of the Big Hollow Project.[3] The fact that this is the first general rate case after the Commission approved a CCN for the Big Hollow Project is completely irrelevant to this case. A LPH was held in the Big Hollow CCN docket because questions of need and in particular, siting, were relevant in that docket.[4] Those questions are irrelevant in this docket. This docket exists for the purpose of evaluating whether Ameren Missouri's current rates need to be increased in order to establish just and reasonable rates for service on a going-forward basis. The Big Hollow Project has no impact on that question whatsoever and even if it did (e.g., if it were going into rate base in this case – it isn't), there would be no reason to hold a LPH near its site because doing so would imply that residents near the site should have some greater or special opportunity to testify at an LPH in the later rate case despite the fact that those persons are in no way impacted differently *by the rate case* than are any other customers located anywhere within the utility's service territory.[5] This is inappropriate, reflects flawed logic, and would reflect bad policy.

5. CCM seeks an additional LPH within the limits of the City of St. Louis, citing the kinds of issues CCM routinely cites (energy burden in the City and general complaints about what CCM claims are an inadequate number of LPHs in rate cases generally). CCM also falsely – or at least incorrectly – claims that this case involves "several" new rate proposals arising from 2005's Senate Bill 4 ("SB 4") (CCM fails to identify them). CCM points to one such issue (the Company's low-income rate program, proposed under SB 4), but fails to identify any others *because there are*

[3] OPC Motion for Additional Local Public Hearing, p. 2, ¶ 2.
[4] OPC had wanted a second, in-person LPH in the CCN case but the Commission rejected that request. There is even less reason to hold a LPH near Big Hollow in this case than there was in the CCN case.
[5] By this logic, the Commission would be holding yet an additional LPH in Warren County which is home to the 300 MW Split Rail Energy Center, which *is* sought for inclusion in rate base in this case, and the same "logic" could have been applied in prior rate cases and in future ones even though, again, the siting of such facilities has no relevance in the later rate case.

none.[6]

6. CCM's request should be denied for another reason. CCM's request, together with OPC's request, means that we now have two parties seeking a 40% increase in the number of in-person LPHs as compared to the Commission's order in the Company's last rate case. And the reason is that when the Company proposed to OPC that the LPHs in this case consist of both the same number *and location* as the Commission ordered in the Company's last case, it was *OPC* that asked the Company and the Staff to recommend an LPH at the University of Missouri-St. Louis ("UMSL") in Normandy, Missouri[7] *rather than* holding one of the four LPHs in the Greater St. Louis region in the City of St. Louis. In the last Company rate case, the Commission did order a fifth in-person LPH and ordered that it be held in the City of St. Louis, which occurred, when it was held at St. Louis Community College in Forest Park. To be clear, it was the Staff's and the Company's original proposal to hold one of the five in-person LPHs in the City, but they agreed to OPC's request to move it to UMSL as an accommodation to OPC, the general public's representative in front of the Commission.[8] While the Company won't purport to speak for the Staff, if the Commission prefers to hold the fifth in-person LPH where it held the City of St. Louis LPH in the Company's last case, the Company has no objection but it does object to adding the LPHs beyond those reflected in the Joint Recommendation, for the reasons discussed herein.

[6] Even if there were, it is not apparent what that would have to do with the number of LPHs in a rate case.
[7] The UMSL location itself is quite close to the City of St. Louis, including near areas of the City that are probably the most economically challenged in the City. The bottom line is that an in-person LPH at the University of Missouri - St. Louis campus is not a barrier to participation, and it can be accessed via private vehicle or readily available public transit.
[8] Section 386.710, RSMo (reflecting OPC's powers and duties, including representation of the public), which was recently cited to by the Commission in File Nos. EA-2026-0343 and EA-2026-0183.

7. The bottom line is that neither OPC nor CCM has presented any compelling logic – and no evidence - supporting the conclusion that the public will not have a fair opportunity to participate in the LPH process in this case if the Joint Recommendation's recommended that five in-person, and two virtual LPHs be scheduled, consistent with the Commission's order in File No. ER-2024-0319. They certainly have presented no evidence that supports the conclusion that it is necessary or proper to increase the number of in-person LPHs by 40% (over the Company's last case) or by 75% (as compared to File No. ER-2022-0337).[9]

WHEREFORE, the Company respectfully requests that the Commission deny the Other Parties' request for two additional local public hearings, and that it instead (i) establish locations, dates, and times for the five in-person and two virtual LPHs reflected in the Joint Recommendation, and (ii) specify the notice the Commission desires the Company to give of the LPHs,[10] and that it order items (i) and (ii) by November 20, 2026,[11] in order to afford sufficient time for the Company to timely provide the required notice of the LPHs.

[9] Nor has the Sierra Club.
[10] In accordance with 20 CSR 4240-20.090(2)(A), the Company submitted a proposed LPH notice as part of Schedule AMM-D1 to the Direct Testimony of Company witness Andrew Meyer – see Item (A) in that schedule.
[11] Assuming the first LPH occurs on January 19, 2027, or after – The Company needs approximately 60 days before the first LPH to ensure that customers receive notice 10 or more days prior to the first LPH.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was served on counsel for all parties of record via electronic mail on this 23rd day of October, 2026.

/s/ James B. Lowery