

Exhibit No. 14

persons or corporations owning, leasing, operating or controlling the same. Electric plant is defined by Section 386.020(14) as all real estate, fixtures, and personal property operated, controlled, used or to be used for or in connection with or to facilitate the generation, transmission, distribution, sale or furnishing of electricity for light, heat or power.

4. Ameren Missouri's *Application* describes the proposed program as, "to provide customers the option to obtain protection from electrical surges that could otherwise enter a customer's electric meter." It further states that, "participating customers will pay a monthly fee of \$9.95 and in exchange the Company will install a surge protection device in the customer's electric meter box that is designed to protect electrical devices from voltage surges and spikes." Ameren Missouri witness Steve Wills calls this device a "collar." Within the testimony of Ameren Missouri witness Jared Schneider he explains that the device provides protection by limiting voltage surges that occur in the normal electrical system as power is supplied to an electronic device. These functions, while noble, cannot be said to be in furtherance of the manufacture, sale or distribution of electricity for light, heat or power. By the nature of Ameren Missouri's own description, the device functions alongside the existing provision of electricity into the customer's home. The question would be can this device be considered a piece of electric plant? While the collar is a fixture as that term is used in the statutory definition, it does not facilitate the generation, transmission, distribution, sale or furnishing of the electricity. The collar could be said to be used, "in connection with" the production of electricity. However, the customer's meters currently function without these devices so the legality hinges on whether the collar becomes a piece of the meter upon its installation.

Staff would propose that it does not. Rather the collar is an optional attachment for an electric meter that serves to protect motor appliances from certain electrical surges.

5. Further, the Western District of the Missouri Court of Appeals considered the definition of electric plant in its ruling on the appeal case, *In the Matter of Kansas City Power and Light Company's Request for Authority to Implement a General Rate Increase for Electric Service v. Missouri Public Service Commission and Midwest Energy Consumers Group*.¹ The Court in that case was presented with the Commission's finding that electric vehicle charging stations were not electric plant. The Court overturned that finding, saying that the purpose of the charging station was to sell electricity to the customer for the purpose of powering their vehicle and that the facility, in this case a charging station, used for the sale of electricity was squarely within the definition of electric plant as contemplated in the statute. The Court's determination hinged on the detail that the "specialized equipment" of the charging station was actually utilized in providing the electricity to the vehicle's battery, which equated to the actual sale transaction occurrence. The charging equipment was compared to the wires, conduit, transformers, insulators, metering equipment and connectors used in traditional electric distribution. What is unique in the present situation is that the collars Ameren Missouri proposes to install on those customer's meters who choose to participate in the program are not actually contributing to the sale of the electricity in any way. Unlike the "specialized equipment" referenced in the Court of Appeals' remand order, the collar is not required to deliver the electricity to the customer. It can be presumed that all of Ameren Missouri's

¹ *In the Matter of: Kansas City Power and Light Company's Request for Authority to Implement a General Rate Increase for Electric Service v. Missouri Public Service Commission and Midwest Energy Consumers Group*, 557 S.W.3d 340, (Mo. App. 2018).

customer meters presently function without this collar attached. Therefore, despite the consideration of the Court's ruling on the Kansas City Power and Light electric vehicle charging consideration, Staff would continue to recommend that these surge protection collars described in Ameren Missouri's Application do not constitute electric plant.

6. Additionally, the Commission will sometimes consider whether there is sufficient competition in a market such to determine that regulation of that market is unnecessary. Effective competition is said to be determined by the Commission pursuant to Section 386.020(13), RSMo, and should be determined by: 1) the extent to which services are available from alternative providers in the relevant market; 2) the extent to which the services of alternative providers are functionally equivalent or substitutable at comparable rates, terms and conditions; 3) the extent to which the policies of Chapter 392, including the reasonableness of rates, as set out in Section 392.185, RSMo, are being advanced; 4) existing economic or regulatory barriers to entry; and 5) any other factors deemed relevant by the Commission and necessary to implement the purposes and policies of Chapter 392. Chapter 392 applies solely to telecommunications, so that does not need to be considered for the purposes of this analysis. In consideration of alternative providers, Staff's investigation unearthed that other products exist in the market, which are also designed to protect electrical appliances from electrical surges, consistent with the intended purpose of the program that Ameren Missouri has provided in its Application. Staff is not certain of the rates and terms and conditions associated with these similar devices, but it appears that there are not any type of economic or regulatory barriers to entry for these competing devices. Additionally, Evergy has a similar program to the one Ameren Missouri proposes in this *Application*, which is not presently regulated

by the Commission. To that end, Staff would recommend that this proposed program should not be considered as within the Commission's jurisdiction and the proposed tariffed program may be rejected solely on those grounds.

7. Additionally, as outlined in Attachment A, Staff recommends through its evaluation of the technical aspects of the program that Ameren Missouri has not provided sufficient technical evidence that the program should be included in its regulated business. Ameren Missouri is required by Commission Rule 20 CSR 4240-10.030(23) to operate its system such that it maintains voltages within a practicable tolerance, but the rule does not hold a utility responsible for causes beyond its control. Therefore, Staff concludes that the surge protection devices provide a service beyond that of the standard service required of Ameren Missouri.

8. If the Commission finds that Ameren Missouri's proposed program is within its jurisdiction and should be offered as a regulated, tariffed program, Staff recommends that the Commission reject the filed tariff sheets as vague and without sufficient testimony to support them. This argument is explained in more detail in Attachment A, Staff's Memorandum.

9. Finally, Staff proposes that if the Commission determines that Ameren Missouri can offer this program on a regulated basis, or alternatively if Ameren Missouri chooses to move forward with this proposed program as an unregulated activity, the Commission should order it to book all expenses including plant, third party costs and any internal costs with a full allocation of the overhead in such a manner that Staff and other parties, in conducting future rate case audits, can appropriately include or exclude the costs of the program from Ameren Missouri's regulated cost of service as the case may

be. Staff would also suggest that if the Commission determines that Ameren Missouri can offer this program on a regulated basis, or alternatively if Ameren Missouri chooses to move forward with this proposed program as an unregulated activity, Ameren Missouri should develop a detailed list of frequently asked questions and responses for its customers and other educational resources. The frequently asked questions should address the specifics of the program and the educational resources should cover power surges and the different types of surge protection devices available outside the program.

WHEREFORE, Staff prays that the Commission will reject Ameren Missouri's *Application* and its revised tariff sheet bearing tracking number YE-2021-0081 as outside of the Commission's regulatory jurisdiction; that if the Commission finds that the proposed program is within its jurisdiction, it rejects the filed revised tariff sheets as vague and lacking sufficient support; that if Ameren Missouri offers the proposed program on a regulated or unregulated bases, the Commission order Ameren Missouri to book all costs related to the program such that future audits for rate increase requests can easily identify these expenses; that if Ameren Missouri offers the proposed program on a regulated or unregulated bases, the Commission order Ameren Missouri to develop a detailed list of frequently asked questions and responses for its customers; and that it grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 10th day of November, 2020, to all counsel of record.

/s/ Whitney Payne

MEMORANDUM

TO: Missouri Public Service Commission
Official Case File Case No. ET-2021-0082 and
Tariff Tracking YE-2021-0081

FROM: Amanda Coffey, Associate Engineer, Engineering Analysis
Lisa M. Ferguson, Utility Regulatory Supervisor, Auditing Department
Contessa King, Regulatory Compliance Manager, Customer Experience
Sarah L.K. Lange, Economist, Tariff/Rate Design

/s/ Natelle Dietrich. 11/10/2020 /s/ Whitney Payne 11/10/2020
Director, Industry Analysis Division/ Date Staff Counsel's Office / Date

SUBJECT: Staff Recommendation to Approve the Community Solar Program of
The Empire District Electric Company

DATE: November 10, 2020

SUMMARY

On September 21, 2020, Ameren Missouri filed tariff sheets in Submission No. YE-2021-0081 to implement a program in which Ameren Missouri will install surge protection devices and facilitate a third party insurance program for its customers (“Surge Protection Program”) that elect to participate in the program. On the same date in File No. ET-2021-0082, Ameren Missouri submitted an Application related to the tariff sheets, and the direct testimony of two witnesses. As more fully explained below, Ameren Missouri has not provided support to offer the Surge Protection Program as a regulated service offering; therefore, Staff Recommends REJECTION of the tariff sheets in Submission No. YE-2021-0081, and provides recommendations should Ameren Missouri offer the Surge Protection Program as an unregulated service.

Program Description

Under the proposed Surge Protection Program participating customers would elect to have a device installed at their meter. It is unclear whether Ameren Missouri would complete the installation or if Ameren Missouri intends to authorize a third party to install a device at each participant customer’s meter.¹

The device would physically limit the voltage entering the home to prevent electrical surges from entering through the meter. The program includes an ongoing insurance program offered through the third party vendor, which for a monthly cost, provides a 15-year limited manufacturer’s

¹ Jared Schneider Direct Testimony, Page 7, Lines 3-4 states Ameren Missouri would complete the installation, however, Ameren Missouri’s response to Staff Data Request 20 states that a third-party would complete the removal of the device and Ameren Missouri’s response Staff Data Request 1 does not specify who will perform its installation.

warranty. The limited manufacturer's warranty provides reimbursement of certain replacement or repair costs of covered household appliances, however, the damage must first be determined to be surge-related by a licensed technician at the customer's expense. The proposed rate for the program is \$9.95 per month. Customers who sign up for the program are locked into a 24-month term. Early cancellation of the service results in a fine of \$9.95 multiplied by the number of months left in the 24 month term. The limited manufacturer's warranty² covers motor driven household equipment such as HVAC units, refrigerators, clothes washers and dryers, dishwashers, freezers, hard-wired fans, and cooking appliances. Common electronic equipment such as computers and televisions would not be covered by the program. The coverage limits are \$5,000 per appliance, \$5,000 per occurrence, and \$50,000 for all occurrences during the warranty period.

Recommendation

Ameren Missouri has not presented adequate evidence that the Surge Protection Program should be included in its regulated business; therefore, Staff recommends the tariff sheets submitted in YE-2021-0081 be rejected. If Ameren Missouri elects to offer this program on an unregulated basis, Staff suggests the Commission order that the costs and expenses including plant, third party costs, and internal costs with full allocation of overhead be maintained in a manner to ensure that they are not included in future rate proceedings. Staff further suggests that Ameren Missouri develop a robust frequently asked questions (FAQ) to accompany any solicitations for participation in such a program, whether offered on a regulated or unregulated basis.

In his testimony, Jared Schneider asserts that Ameren Missouri's electric system is designed to provide as high of a level of surge protection as is practical, but there are still surge events that cannot be prevented.

Commission Rule 20 CSR 4240-10.030(23) requires Ameren Missouri to operate its system to maintain voltages within a practicable tolerance while not holding the utility responsible for causes beyond its control.³ Staff views the installation of the surge protection device as providing additional protection to customer's property above standard service. These proposed devices do not contribute to the sale of electricity.

In the event that the Commission determines that a surge protection program cannot be offered by Ameren Missouri on an unregulated basis, and that a surge protection program is in the interest of Ameren Missouri's customers to be offered on a regulated basis, the program as proposed and tariff as designed should still be rejected. The tariff sheets submitted in YE-2021-0081 are vague and the analysis performed by Ameren Missouri referenced in testimony is unreliable. Staff will further summarize these concerns in this memorandum. Staff further recommends, if the Commission determines the program should be offered as a regulated service, the Commission direct Ameren Missouri to develop FAQs and other educational resources. Finally, Staff

² Staff has requested a copy of limited manufacturer's warranty in DR 0024, response due November 10, 2020.

³ 20 CSR 4240-10.030(23) states in part, "Each electric utility supplying energy from a constant potential system shall adopt standard service voltages for the entire system and each subdivision. Every reasonable effort shall be made by the use of proper equipment and operation to maintain those voltages within a practicable tolerance...The utilities will not be held responsible for variations in service voltage at a customer's premises caused by the operation of that customer's apparatus in violation of the utility's rules or by the action of the elements or causes beyond the utility's control."

recommends accounting guidance to audit the cost effectiveness of the program in future rate cases should be included in any authorizing order.

Discussion

Similar Programs and Customer Interest

In response to DR 0002, Ameren Missouri submitted information about similar surge protection programs offered by several other companies, including a program offered by Evergy. All of these other programs are offered outside of a regulated tariff. The table below shows the information provided by Ameren Missouri in DR 0002, along with the information for the proposed Ameren Missouri Surge Protection Program for comparison.

Utility Name	Price per month	Coverage Limits	Covered Items	Term & Change Provisions
Florida Power and Light	\$10.95 for SPD \$10.95 for warranty \$15.95 for both	\$5,000 per item, \$5,000 annual, \$100,000 lifetime for SPD and \$5,000 for electronics	SPD - motor driven, warranty - electronic	30 day tem length, no cancellation fee
Duke Energy	\$7.99 for SPD \$2.99 for warranty	\$10,000 lifetime for SPD \$2,000 annual for additional warranty	SPD - motor driven, warranty- electronic	30 day term length, no cancellation fee, \$60 removal fee if not on program for 24 months
Evergy	\$5.95 for \$500 per item, \$5,000 annual; \$7.95 for \$1000 per item, \$10,000 annual & basic interior wire protection (\$500 claim limit)		"Cord and Plug" connected appliances and electronics	No term length, \$150 cancellation fee if not on program 24 months
Georgia Power	\$9.95	\$5,000 per item, \$5,000 per occurrence, \$100,000 lifetime	Motor driven	No term length, no cancellation fee
Ameren Missouri	\$9.95	\$5,000 per appliance, \$5,000 per occurrence, \$50,000 lifetime	Motor driven	24 month term, cancellation fee equal to the remaining cost of term

In response to Staff DR 9, Ameren Missouri indicated that Ameren Illinois does not offer a similar program.

Ameren conducted two surveys to acquire customer interest in surge protection options.⁴ An explanation of Ameren’s market research efforts and online residential panel is provided on page four and five of the direct testimony of Jared Schneider. Staff reviewed survey methodology and results and agrees that the survey indicates strong customer interest in a surge protection program. However, Staff questions if survey results would have yielded different results if participants were

⁴ OPC Data Request 1102, early surge concept was issued to the panel between December 13 – 30, 2019. The second survey was conducted from April 6 – 13, 2020.

aware of Ameren’s eligibility requirements. Ameren Missouri proposed tariff sheet 166 states the following:

AVAILABILITY

Service under this Program is available to permanent 1(M) electric customers served by the Company whose electric meter base allows for the safe installation of the surge protection device, as determined in the Company's sole discretion, and who have not been disconnected for nonpayment for electric service within twelve (12) months preceding their Program application.⁵

Ameren Missouri’s Surge Protection Program will not be available to customers that have been disconnected for nonpayment for electric service within 12 months preceding their application. Staff reviewed survey questions and did not find where Ameren presented disqualifying factors to the online residential customer panel. Admittedly, the focus of the survey was to garner interest around surge protection; however, Ameren Missouri’s omission of proposed program design, specifically which residential customers may enroll, could have influenced the customer interest referenced in Mr. Schneider’s testimony.

In addition, while the proposed program will not cover computers, televisions, electric vehicle charging equipment, electric vehicles, or home solar generation installations, Ameren Missouri’s survey responses indicate that the “Whole Home” language and branding was preferred by customers because it implied encompassing protection.⁶ One of the questions in the survey also specifically asked if the person ever experienced an electrical surge in their home that damaged electrical equipment, such as a refrigerator, AC unit, stereo equipment, TV, dishwasher, or computer⁷. In Staff’s opinion this is misleading because as previously noted, not all of those items would be protected under the limited manufacturer’s warranty.

Recommended Accounting Guidance

Whether offered on an unregulated basis or as a program subject to the authority of this Commission, creation of certain subaccounts and retention of all records is necessary to reduce the possibility of cross-subsidization. If Ameren Missouri elects to offer this program on an unregulated basis (i.e., below-the-line), the electric affiliate transaction rule requirements should be applied, which includes separate cost tracking of the service and full overhead loading. In the event the Commission allows the service to be offered on a regulated basis (i.e., above-the-line), Ameren Missouri should still retain all documentation as well as account for all components of the service separately with unique general ledger coding, and apply full overhead loading, in case Staff or other parties propose that the Commission take the program below-the line in setting Ameren Missouri’s customer rates in subsequent rate cases, and to facilitated proper allocation of costs and revenues among participating and non-participating customers.

⁵ YE-2021-0081, MO P.S.C Schedule No. 6, 1st Revised Sheet No. 166

⁶ April 24 presentation provided in response to OPC DR 1102.

⁷ OPC Data Request 1102, Surge Protection Branding April Study Raw Responses.

Recommended FAQ and Educational Resource

Whether offered on an unregulated basis or as a program subject to the authority of this Commission, Staff recommends that Ameren Missouri develop and make available to its customers a robust FAQ and other educational resources in addition to its marketing materials.⁸ The robust FAQ should address the specifics of the program and the educational resource should cover power surges and the different types of surge protection devices available outside the program. There are three types of surge protection devices on the market which provide different levels of protection, all of which consumers can purchase independently at a wide range of prices. Many of these devices also come with a manufacturer's warranty.

If offered on an unregulated basis, the Commission should encourage Ameren Missouri to provide a FAQ and other educational resources that address, among the other concerns indicated below, that the program is not regulated by the Commission. If offered on a regulated basis, the creation of an appropriate FAQ and other educational resources should be ordered by the Commission.

Insufficiencies in Non-Participating Ratepayer Analysis

As previously noted, if the Commission determines a Surge Protection Program is in the interest of Ameren Missouri customers, may legally be offered on a regulated basis, and should be offered on a regulated basis, Staff still recommends that the tariff sheets submitted in YE-2021-0081 be rejected as vague, and the program as proposed is poorly designed. At page 12 of the direct testimony of Mr. Steve Wills, Ameren Missouri presented an analysis that indicated that non-participating customers will achieve monetary benefits from the Surge Protection Program. Mr. Wills' provides a table of the annual level of program costs and program revenues that are reflected in non-participating ratepayer bills. He opines that after an initial rate case in which the costs of the program exceed the benefits of the program, non-participating ratepayers will receive ongoing benefits in the form of offsetting revenues. However, this analysis omitted the impact of Ameren Missouri's requested accounting treatment,⁹ is based on unreliable inputs,¹⁰ relies on questionable ratemaking estimations,¹¹ and is completely dependent on rate case timing assumptions.¹² In response to Staff DR 1.2, Ameren Missouri updated this analysis to reflect a portion of the ratepayer impact of plant-in-service accounting (PISA) treatment. The graph below provides a more accurate representation of the material Mr. Wills' provides at page 12, updated

⁸ If offered on an unregulated basis, the Commission's order should suggest Ameren Missouri develop and make available these materials.

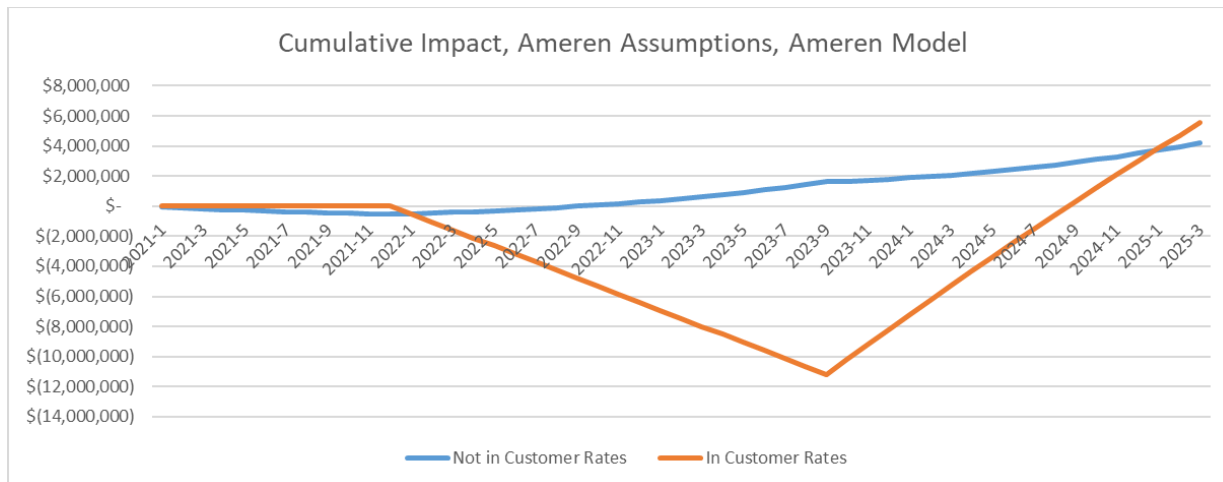
⁹ In response to Staff DR 7, Ameren Missouri indicated that it anticipates PISA treatment pursuant to Section 393.1400 RSMo for the installed surge protection devices and related depreciation expense.

¹⁰ For example, the revenue model Mr. Wills prepared for Mr. Schneider assumes 5% of customers signing up for the Surge Protection Program will terminate Surge Protection service in January of 2021, the month that they begin to receive the service. Mr. Schneider's "Expected" analysis relies on nearly \$24,000 in early termination revenues in the first year of program operation.

¹¹ For example, Mr. Will's analysis includes test year amounts that consist of the most recent 12 months of data, unannualized. In response to Staff DR 1.1 Ameren Missouri acknowledged that the program is not designed to bear an allocated portion of overhead costs and expenses.

¹² In particular Mr. Wills' assumptions include an assumption that all customers will pay higher rates because the program exists than they would pay if it did not exist - for some period of time. The magnitude and duration of that subsidy determines whether or not the program will ultimately reduce rates for non-participating ratepayers or not - over some period of time.

only to reflect Mr. Wills’ estimation of the requested accounting treatment on the net costs of the program reflected in ratemaking, and to indicate the cumulative impact as opposed to the first-of-the-year status provided by Mr. Wills.



This updated analysis indicates that non-participating ratepayers will cease being worse off for the program’s existence around September of 2024 if all of Ameren Missouri’s assumptions and analysis are reasonable.¹³ However, as referenced above, neither the ratemaking assumptions and analysis nor the underlying net revenue assumptions and analysis are reasonable. As indicated by the deep dip in the orange line in the graph above, under Ameren Missouri’s assumptions, the program will cause non-participating ratepayers to pay about \$11 million dollars more than they otherwise would.

In response to Staff DR 21, Ameren Missouri indicated that the implementation projections are based on prior program deployments by other utilities and have not been adjusted to reflect any impact of the 2020 economic downturn.

Concerns with Program Design and Insufficiencies in Tariff Design

Staff is concerned with the conflicting statements regarding what protection the device will actually offer. Jared Schneider’s testimony seemingly indicates that the device will offer protection from surges caused by lightning strikes, while the additional program terms outlined in the tariff pages submitted by Ameren Missouri specifically state that the device cannot offer protection from surges caused by lightning strikes to the home or property. The additional program terms also specify many other circumstances under which the device cannot offer protection. Staff is concerned that customers will not fully understand what the device is capable of or the actual level of protection that they would be receiving in terms of which surge events the device will

¹³ If the analysis and assumptions were reasonable, this graph indicates that non-participating customers would begin to achieve the level of incoming revenue experienced by shareholders sometime in early 2025.

effectively serve as protection against and which household appliances will be covered under the manufacturer's warranty.

As designed, the Surge Protection Program does not reasonably apportion risk to non-participating ratepayers. In response to OPC DR 1101 Ameren Missouri declined to record the program revenues contributed to cover the cost of the device as contributions in aid of construction (CIAC). In response to Staff DR 6 Ameren Missouri indicated that the termination fee will be recorded to Account 451 as Miscellaneous Revenue. Thus, this program would increase Ameren Missouri's regulated revenue requirement without implementing reasonable measures to offset the increases to ratebase with the dedicated stream of program revenues.¹⁴ Of note, in Ameren Missouri's "December Research" presentation provided in response to OPC DR 1102, Ameren Missouri noted that 73% of its residential survey participants indicated that they were interested in purchasing the surge collar device outright from Ameren Missouri, which is not an option under the current Ameren Missouri proposal. Only 43% of those responding were interested in making recurring payments for surge protection insurance. Thus, as designed, Ameren Missouri's proposed program shifts risks to non-participating customers by incorporating features that Ameren Missouri's research suggests makes the program less attractive to potential participating customers.

In general, the tariff provided is vague and does not include necessary parameters. For example, virtually all pertinent terms and conditions are described as contained in the manufacturer's warranty. However, the manufacturer is not disclosed, contact information for the manufacturer is not provided, and in response to Staff DR 5, Ameren Missouri indicated that it does not intend to make this material available to customers until the time of a given customer's enrollment in the program.

The program as designed and described in the proposed tariff sheets is likely to cause customer confusion. In response to Staff DR 3, Ameren Missouri indicated that the program's warranty will not cover electric vehicle charging equipment in the event it is damaged by a surge. In response to OPC DR 1109, Ameren Missouri indicated that the program's warranty will not cover customer-owned solar equipment. In response to OPC DR 1110, Ameren Missouri indicated that the program's warranty will not cover grid-connected electric vehicles. These limitations should be plainly identified in any implementing tariff sheets, if it is determined that a tariff is applicable. In response to OPC DR 1107, Ameren Missouri indicated that "in the event a customer believes to have experienced a surge through the meter that has damaged an item covered by the limited product warranty, he or she must submit a claim form along with a signature and estimate from a licensed service technician/repair man validating the damage to the covered item was surge related." This requirement (which may be cost prohibitive for some participants) should be disclosed in the tariff, if it is determined that a tariff is applicable.

Ameren Missouri's April 24 presentation provided in response to OPC DR 1102 indicates that interest in the Surge Protection Program was highest among those who rent their home or apartment. However, the tariff provisions detailing device coverage and warranty operation are sparse. Based on Ameren Missouri's responses to Staff DR 4 (attached) significant detail should be added to the tariff, if it is determined that a tariff is applicable, and to the program marketing materials to address program operation, particularly for those who rent or own rental properties.

¹⁴ Based on Mr. Schneider's net revenue model, 3rd party removal cost is charged to O&M.

Additional details concerning more reasonable accounting treatments and more reasonable protection of non-participating ratepayers from the risks of this program should be incorporated into any tariff to implement this program, if undertaken as a regulated activity.

Other matters

Staff is not aware of any other matters pending before this Commission that are related to the issues in this docket. Ameren Missouri is not delinquent in payment of its Commission assessment or submission of its 2020 Annual Report.

