

**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         )     **File No. ER-2021-0240**  
Adjust its Revenues for Electric Service     )

**STAFF MOTION TO AMEND COST OF SERVICE REPORT  
BY INTERLINEATION**

Pursuant to Rule 20 CSR 4240-2.130(10) and 20 CSR 4240-2.080(18), Staff respectfully requests leave be granted to amend its Cost of Service (CoS) Report<sup>1</sup> (both Public and Confidential) as requested herein. In support, Staff states the following:

1. Under Rule 20 CSR 4240-2.130(10), a party may be permitted to supplement pre-filed prepared testimony on order by the presiding officer or the Commission.

2. Similarly, under Rule 20 CSR 4240-2.080(18), “[a]ny pleading may be amended within ten (10) days of filing, unless a responsive pleading has already been filed, or at any time by leave of the commission.”

3. Page 133 of Staff’s CoS Report referenced an article in footnote 16 as Appendix 4. The actual article was inadvertently omitted from Staff’s CoS Appendix 4.

4. Staff requests that leave be granted to amend by interlineation page 133, footnote 16 of the CoS Report to refer to and incorporate the article as Appendix 6 such that it reads as follows (underline indicates change):

<sup>116</sup> “MISSOURI, KANSAS UTILITIES MAY USE LOOPHOLE TO CHARGE CUSTOMERS FOR FOSSIL FUEL LOBBYING,” ALLISON KITE, THE MISSOURI INDEPENDENT, JUNE 7, 2021. APPENDIX 6 IS INCLUDED HEREIN.

---

<sup>1</sup> Staff requests leave to amend the pages in both the public and confidential versions, although page 133 of the CoS report does not contain any confidential information.

5. Further, Staff requests that leave be granted to amend the CoS Report (both Public and Confidential) to attach the article as Appendix 6.

6. The proposed page 133 of the CoS Report and proposed Appendix 6 are attached to this Motion and incorporated by reference.

7. The amendment requested herein is being requested as soon as it was brought to Staff's attention, and it should not result in any prejudice or undue delay for any party.

**WHEREFORE**, Staff respectfully requests leave be granted to amend by interlineation page 133, footnote 16, of Staff's Cost of Service Report (both Public and Confidential) as described above, and to amend Staff's Cost of Service Report to include the article reference in footnote 16 as Appendix 6, and for such other and further relief the Commission deems just and reasonable.

Respectfully submitted,

**/s/ Curt Stokes**

Curt Stokes

Chief Deputy Counsel

Mo. Bar No. 59836

P.O. Box 360

Jefferson City, MO 65102

(573) 751-4227 (Telephone)

(573) 751-9285 (Facsimile)

[Curtis.Stokes@psc.mo.gov](mailto:Curtis.Stokes@psc.mo.gov)

**Counsel for Staff of the  
Missouri Public Service Commission**

**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 15th day of September, 2021, to all parties and/or counsels of records.

**/s/ Curt Stokes**