



a stipulation and agreement was filed herein reflecting the settlement in principle referenced in Ameren Missouri's Motion to Modify Procedural Schedule filed on March 29, 2023.

**List and Schedule of Witnesses/Issues/Etc.:**<sup>2</sup>

**Wednesday, April 12, 2023:**

Mark Exhibits  
Entries of Appearance  
Motions and Outstanding Matters

**Mini-opening statements** on Issue 1 (formerly Issue 4) and all sub-parts<sup>3</sup> in the following order:

Ameren Missouri ("Ameren")  
Staff of the Missouri Public Service Commission ("Staff")  
Office of the Public Counsel ("OPC")  
Missouri Industrial Energy Consumers ("MIEC")  
Sierra Club ("Sierra")  
Consumers Council of Missouri ("CCMo")  
Midwest Energy Consumer Group ("MECG")  
Renew Missouri ("Renew")  
Missouri NAACP and Metropolitan Congregations United

**ISSUE 1 (formerly Issue 4) -- Class Cost of Service, Revenue Allocation, Rate Design and Rate Switching Tracker.**

- A. How should production costs be allocated among customer classes within a Class Cost of Service Study?
- B. How should distribution costs be allocated among customer classes within a Class Cost of Service Study?
- C. Which party's Class Cost of Service Study should be used in this case and used as a starting point for the non-residential rate design working case agreed to by the parties to the Company's last electric general rate case, File No. ER-2021-0240?

---

<sup>2</sup> Order of witnesses and order of cross-examination may be modified at the hearing with the approval of the judge due to witness availability or to reflect actual adverseness.

<sup>3</sup> Given the number of issues that have settled, the parties intend to give mini-opening statements on each issue reserved for hearing rather than a general opening statement for the entire case.

- D. How should any rate increase be allocated to the several customer classes?
- E. What should the customer charges associated with the Residential Class rate plans be?
- a. If the customer charges for the Ultimate Saver and Smart Saver Plans are discounted relative to other residential rate plans, should a minimum demand charge be imposed with customers to be fully educated on the minimum demand charge?
- F. What changes should be made, if any, to the Residential rate plans offered by the Company?
- a. Should Staff's proposal to eliminate the Anytime (flat) rate option for any Residential customers who have an AMI meter be approved?
  - b. What changes, if any, should be made to the deployment of residential ToU rate plans?
- G. What changes should be made, if any, to the Non-Residential, Non-Lighting rate options offered by the Company?
- a. Should Staff's proposal to introduce a time-based overlay for all Non-Residential, Non-Lighting classes for all customers who have an AMI meter and are not served on a time-based schedule be adopted?
  - b. Should MEGC's proposed shift to increase the demand component for Large General Service and Small Primary Service and decrease energy charges be adopted?
  - c. Should the Commission approve MEGC's proposed optional EV charging 3M/4M rate design?
  - d. Should the Rider C factor be adjusted?
  - e. Should the values for the monthly customer charge, Rider B credits, and Reactive Charge remain consistent for SPS and LPS customers because these costs are effectively the same regardless of the customer class?
- H. Rate structures:
- a. Should the cost-causation and rates of Riders B & C be fully evaluated?

- b. Ordered Rider B Study - Did Ameren Missouri comply with the Report and Order in ER-2021-0240 at pages 31 – 34, where the Commission addressed whether it should require “Performance of a study of the reasonableness of the calculations and assumptions underlying Rider B to be filed as part of the Company’s direct filing in its next general rate case?” The decision paragraph at pages 33-34 states “The Commission will not suspend the Rider B credits, but it believes the question of the proper calculation of those credits should be further addressed in Ameren Missouri’s next rate case. Therefore, the Commission will direct Ameren Missouri to study the reasonableness of the calculations and assumption underlying Rider B and to file the results of that study as part of its direct filing in its next general rate case.”
- c. Should Ameren Missouri be ordered to record transmission assets related to maintenance of voltage support due to the retirement of large synchronous generators be recorded to new subaccounts?
- d. Should Ameren Missouri be ordered to retain customer and rate schedule characteristics related to draws of reactive demand?
- e. Should Ameren Missouri be ordered to create subaccounts within distribution accounts and transmission accounts (plant and reserve) for recording infrastructure related to utility-owned generation?
- f. Should Ameren Missouri be ordered to provide a study of the customer specific infrastructure, by account, by rate schedule, by voltage, in its next general rate case?
- g. Should Ameren Missouri be ordered to provide data concerning the level of rate base and expense associated with radial transmission facilities including substation components, by customer?
- h. What information should Ameren Missouri provide for any rate modernization workshop, or for its next general rate case?
- i. Should Ameren Missouri be required to study potential rate structures and make available related determinants?
- l. Should the Commission authorize Ameren Missouri to track some valuation of estimated revenue changes that may arise from residential customer rate switching?
- a. Is the Ameren Missouri requested method for calculating the tracker balance reasonable?

b. Are alternative approaches available to address what Ameren Missouri characterizes as an inherent disincentive for the utility to pursue a rapid transition toward broad adoption?

Harding (Ameren Missouri)  
Hickman (Ameren Missouri)  
Brown (Ameren Missouri)  
Wills (Ameren Missouri)  
Marke (OPC)  
Hutchinson (CCM)  
Brubaker (MIEC)  
Chriss (MECG)<sup>4</sup>  
Lange, Sarah (Staff)

**Thursday, April 13, 2023:**

**Complete Issue 1 (If needed)**

**Mini-opening statements** on Issue 2 (formerly Issue 24B)

**ISSUE 2 (formerly Issue 24B) -- Depreciation/Continuing Property Record ("CPR").**

A. Should the Company be ordered to change the manner that property retirements are recorded to its CPR?

Spanos (Ameren Missouri)  
Lansford (Ameren Missouri)  
Cunigan (Staff)  
Robinett (OPC)

**Mini-opening statements** on Issue 3 (formerly Issue 30)

**ISSUE 3 (formerly Issue 30) -- Identification of Avoided Capital Investments for the Sioux and Labadie Coal Plants.**

A. Should the Company be required to identify avoided capital investments should the Sioux or Labadie Energy Centers retire earlier than currently planned as recommended by Sierra Club witness Comings?

Comings (Sierra Club)  
Michels (Ameren Missouri)

---

<sup>4</sup> Presentation of MECG witness Chriss on Issue 4 will take place on Friday, April 14 (Chriss appearing virtually)

**Friday, April 14, 2023:**

Presentation of MECG witness Chriss on Issue 1 (Chriss appearing virtually).

Complete remaining matters, if any.

**Order of Cross-Examination:**

*For witnesses of:*

Ameren	MIEC, MECG, MCU/NAACP, Sierra, Renew, CCMo, OPC, Staff
Staff	OPC, MIEC, MECG, MCU/NAACP, Sierra, Renew, CCMo, Ameren
OPC	Staff, MIEC, MECG, MCU/NAACP, Sierra, Renew, CCMo, Ameren
MIEC	MECG, MCU/NAACP, Sierra, Renew, CCMo, OPC, Staff, Ameren
Sierra	MECG, MCU/NAACP, MIEC, Renew, CCMo, OPC, Staff, Ameren
MCU	MECG, Sierra, MIEC, Renew, CCMo, OPC, Staff, Ameren
NAACP	MECG, MIEC, Sierra, Renew, CCMo, OPC, Staff, Ameren
CCMo	MECG, MCU/NAACP, MIEC, Sierra, Renew, OPC, Staff, Ameren
MECG	MCU/NAACP, MIEC, Sierra, Renew, CCMo, OPC, Staff, Ameren
Renew	MECG, MCU/NAACP, MIEC, Sierra, CCMo, OPC, Staff, Ameren

The parties agree to waive cross-examination of any witness not listed above.

**WHEREFORE** Staff submits this Updated Issues List as ordered by the Commission's Order of April 4, 2023.

Respectfully submitted,

Jeffrey A. Keevil  
Deputy Counsel  
Missouri Bar No. 33825  
Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 526-4887 (Telephone)  
(573) 751-9285 (Fax)  
jeff.keevil@psc.mo.gov (e-mail)

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 10th day of April 2023.

**/s/ Jeffrey A. Keevil**