

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

In the Matter of the Establishment of a Working)
Case Regarding a Commission Rule Governing) File No. AW-2021-0070
Revenue Stabilization Mechanisms)

AMEREN MISSOURI'S INITIAL COMMENTS

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Company" or "Ameren Missouri"), and responds to the Missouri Public Service Commission's ("Commission") *Order Opening a Working Case to Consider a Commission Rule Regarding Revenue Stabilization Mechanisms* effective September 23, 2020, which directs any stakeholder wishing to submit written comments regarding the rule being considered by the Commission to do so no later than October 12, 2020. Ameren Missouri provides the following initial comments:

1. As a preliminary matter, Ameren Missouri appreciates the opportunity to provide these comments and otherwise participate in this docket. The Company looks forward to providing more specific comments on the proposed rules the Commission Staff is developing once developed.

2. Ameren Missouri's current gas Rider DCA – Delivery Charge Adjustment is a revenue stabilization mechanism ("RSM") under subsection 3 of Section 386.266 RSMo. The Company's Rider DCA was approved as part of the resolution of the Company's last gas general rate case, File No. GR-2019-0077, and first became effective on September 1, 2019.

3. Generally, the Company encourages the Commission to not be overly prescriptive in the rules to be developed on RSMs and allow sufficient flexibility to accommodate different reasonable methodologies and circumstances of individual utilities.

4. Ameren Missouri believes the procedural requirements set out in its Rider DCA are reasonable, and should reasonably be included in any Commission rules on RSMs. More

specifically, the Company's Rider DCA provides the following procedural requirements: (a) for the DCA to be revised annually; and (b) requires revisions of the DCA to be filed with the Commission at least sixty (60) days in advance of the effective date for the annual revisions.

5. Subsection 15 of Section 386.266 RSMo already provides for detailed quarterly surveillance monitoring by corporations with an RSM. The Company supports any Commission rules on RSMs incorporating such quarterly surveillance monitoring requirements.

Respectfully submitted,

/s/ Jermaine Grubbs

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Dated: October 12, 2020

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to the parties of record on
this 12th day of October, 2020.

/s/ Jermaine Grubbs
Jermaine Grubbs