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1821 – 2021

Missouri Public Service Commission
ANNUAL REPORT 2021

PSC COMMISSIONERS

Pictured left to right: Commissioner **Glen Kolkmeyer**; Commissioner **Maida J. Coleman**; Chairman **Ryan A. Silvey**; Commissioner **Scott T. Rupp**; Commissioner **Jason R. Holsman**.

Missouri Public Service Commission

MAIDA J. COLEMAN
Commissioner

SCOTT T. RUPP
Commissioner

RYAN A. SILVEY
Chairman

POST OFFICE BOX 360
JEFFERSON CITY, MISSOURI 65102
573-751-3234
573-751-1847 (Fax Number)
http://psc.mo.gov

JASON R. HOLSMAN
Commissioner

GLEN KOLKMEYER
Commissioner

October 25, 2021

The Honorable Michael L. Parson
Governor of Missouri
State Capitol
Jefferson City, Missouri

Dear Governor Parson:

As Chairman of the Missouri Public Service Commission, it is my pleasure to submit the agency's Annual Report for the fiscal year July 1, 2020 through June 30, 2021, as well as additional information for the calendar year 2021. The Commission's work this year included the following:

- **COVID-19 Pandemic:** Missourians continue to be impacted by the COVID-19 pandemic. Regulated public utilities have continued to provide safe and reliable service through the COVID-19 pandemic and the Commission has supported the utilities' voluntary efforts to support their customers during this difficult time. The Commission approved tariffs filed by Spire Missouri to help eligible small business customers struggling as a result of the COVID-19 pandemic; granted an Ameren Missouri request to temporarily increase the qualifying federal poverty level associated with its Keeping Current Low Income Pilot Program providing assistance to additional customers during the pandemic; approved Spire Missouri's request to extend its COVID-19 residential assistance program; and approved Accounting Authority Orders (AAOs) for Spire Missouri, Ameren Missouri, Evergy Missouri and Missouri-American Water Company to track costs, financial impacts and any savings associated with the COVID-19 pandemic.
- **February 2021 Cold Weather Event**: The Commission opened a case in February to investigate the impact of the February 2021 cold weather event on investor-owned utilities and their customers. Much of the Midwest, including Missouri, experienced unseasonably cold temperatures in February which resulted in rolling electrical blackouts and extreme natural gas price spikes. The Commission opened this case to investigate Missouri electric and natural gas utilities' preparation for and response to this extreme cold weather event. A detailed report was filed with the Commission by the Regulatory Analysis Department and the PSC Staff on April 30, 2021.
- **Working Dockets:** The Commission opened or continued several working dockets during the fiscal year including: Federal Energy Regulatory Commission (FERC) Order 2222 regarding the participation of distributed energy resource aggregators in markets operated by Regional Transmission Organizations (RTOs) and Independent System Operators; consideration of amendments to the PSC's Cogeneration Rule; consideration of revenue stabilization mechanisms; consideration of membership of investor-owned electric utilities in RTOs; addressing a proposed rule by the Office of the Public Counsel to establish standardized reporting requirements for utilities to facilitate proper data collection regarding customer service disconnection policies and practices; consideration of updating and amending certain PSC natural gas safety rules; and consideration of locating practices to reduce the amount of pipeline damage in Missouri resulting from insufficient locating practices.

- **Agenda Meetings and Hearings during the COVID-19 Pandemic**: Despite the closure of the Governor Office Building to the public due to the pandemic, the Commission continued to conduct weekly agenda meetings and case hearings via WebEx and streamed live on the Commission's website. The Commission also developed a virtual public hearing format giving consumers an opportunity to comment on pending cases before the PSC through their computer or phone without leaving their home. These hearings also provide the Commission with an opportunity to educate consumers on the role of the Commission and to answer any questions they may have about the utility services they receive.
- **Ameren Missouri MEEIA Cycle 3 Program:** The Commission approved an agreement authorizing Ameren Missouri to continue promoting demand-side programs, including energy efficiency and demand response programs under an extension of Ameren Missouri's Cycle 3 Missouri Energy Efficiency Investment Act (MEEIA).
- **Wind Generation/Solar:** The Commission approved a certificate of convenience and necessity (CCN) to Ameren Missouri to build a solar generating facility in Montgomery County near New Florence, Missouri.
- **Ameren Missouri AMI:** The Commission approved an agreement which sought a variance from certain Ameren Missouri tariffs and Commission rules allowing the utility company to implement its Advanced Metering Infrastructure (AMI).
- **Missouri Universal Service Fund:** The Commission made modifications to the Missouri Universal Service Fund. The amount of the discount for Lifeline voice-only service increased while the Commission continues to suspend the assessment that provides funding for the state fund.
- **Federal Activity:** The Commission continues to be a strong and active voice for Missouri ratepayers by monitoring and intervening in cases before the Federal Energy Regulatory Commission (FERC) and the Federal Communications Commission (FCC).
- **Open Proceedings**: Consumers can access the Commission's website and view, in real time, hearings in cases before the Commission or watch the Commission conduct business in its weekly Agenda meeting by accessing the website (**psc.mo.gov**). In addition, consumers can view all public information filed in cases through the Commission's Electronic Filing and Information System (EFIS).

As our report illustrates, the Public Service Commission had a very busy and productive year serving the citizens of Missouri. I hope you will find this report helpful. If there is any additional information I can provide, please contact me.

Sincerely,

Ryan A. Silvey
Chairman

2021
Table of Contents

CONTACTING THE PSC

Missouri Public Service Commission offices are located in Jefferson City, St. Louis and Kansas City. The PSC's regular business hours are from 8:00 a.m.-12:00 noon and 1:00 p.m.-5:00 p.m., Monday through Friday, except on state holidays.

Jefferson City: Missouri Public Service Commission

Governor Office Building
200 Madison Street
(Mailing Address: P.O. Box 360)
Jefferson City, MO 65102
Other Business: (573) 751-3234
Fax: (573) 751-1847

St. Louis: Missouri Public Service Commission

Wainwright State Office Building
111 North 7th Street, Suite 105
St. Louis, MO 63101
Telephone No.: (314) 244-2141
Fax: (314) 244-2100

Kansas City: Missouri Public Service Commission

Fletcher Daniels State Office Building
615 E. 13th Street, Room 201
Kansas City, MO 64106
Telephone No.: (816) 889-3949
Fax: (816) 889-3957

Toll-free Consumer Hotline for Complaints/Inquiries: (800) 392-4211

Manufactured Housing/Modular Unit Complaints: (800) 819-3180

Website Address: psc.mo.gov

BUDGET

	Fiscal Year 2022
Public Service Commission	
Public Service Commission-Personal Service	$11,682,468
Public Service Commission-Expense & Equipment	$2,287,016
Public Service Commission-Refunds	$10,000
Total	$13,979,484
Full-Time Employees (F.T.E.)	191.00
Deaf Relay Service and Equipment Distribution Program	
Expense & Equipment Appropriation	$2,495,860
Total	$2,495,860
Full-Time Employees (F.T.E.)	0.00
Manufactured Housing Department	
Personal Service	$403,061
Expense & Equipment	$354,478
Program Specific Distribution (MH)	$50,000
MH-Refunds	$10,000
Subtotal	$817,539
Program Specific Distribution MH Consumer Recovery*	$192,000
Total	$1,009,539
Full-Time Employees (F.T.E.)	8.00
TOTAL BUDGET	**$17,484,883**
TOTAL FTE	**199.00**

*Consumer Recovery Fund Appropriation

Ryan A. Silvey,
Chairman

Chairman Ryan A. Silvey was appointed to the Missouri Public Service Commission by Governor Eric Greitens on January 2, 2018. He was unanimously confirmed by the Missouri State Senate on January 4, 2018. Silvey was appointed Chairman by Governor Michael Parson on September 17, 2018.

He represents the Missouri Public Service Commission on the Board of Directors for the Organization of MISO States (OMS). Within OMS, he is a member of the Seams Liaison Committee.

Prior to his appointment to the Public Service Commission, Chairman Silvey was a Missouri State Senator, serving the 17th Senatorial District since January 2013. The 17th District is located in the Southwest corner of Clay County, and includes parts of Kansas City, Gladstone, Oaks, Oakwood, Oakwood Park, Oakview, Liberty, Glenaire, Pleasant Valley, Claycomo, North Kansas City, Avondale, Randolph and Birmingham.

While in the Senate, Silvey served as the Chairman of the Committee on Commerce, Consumer Protection, Energy and the Environment, which handled legislation regarding utility regulation. He also served as Vice-Chairman of the Senate Appropriations Committee, as well as Vice-Chairman of the Committee on Governmental Accountability and Fiscal Oversight. Additionally, he served as a member on the Committee for Veterans' Affairs and Health, the Joint Committee on Legislative Research and the Joint Committee on Administrative Rules. Furthermore, he was the Senate Representative on the Missouri Technology Corporation Board.

As an 8th generation Missourian, Chairman Silvey was raised in Clay County, where he attended Meadowbrook Elementary, Antioch Middle and Oak Park High Schools. After graduating from Bob Jones University in Greenville, South Carolina, Chairman Silvey became an advisor to U.S. Senator Christopher S. “Kit” Bond on issues such as Science, Technology, Space Policy and National Defense, where he held a Top Secret security clearance.

Before winning election to two terms in the State Senate, Chairman Silvey served four terms in the Missouri House of Representatives, from 2005 through 2012. During that time he was Chairman of the Appropriations General Administration Committee, Chairman of the Joint Committee on Capital Improvements and Leases Oversight, as well as Vice-Chairman of the Small Business Committee, and Vice-Chairman of the Homeland Security Committee.

In 2011, Silvey became Chairman of the powerful House Budget Committee, making him the youngest Legislative Budget Chairman in the nation. Serving as Budget Chairman in 2011 and 2012, Chairman Silvey guided the state through the “Great Recession” by balancing Missouri’s budget without raising taxes. Under his leadership, Missouri remained one of just seven states to boast a AAA bond rating.

Chairman Silvey resides in Jefferson City with his wife, Angela, and their two daughters, Taylor Mansker, and Kally Silvey. They attend Fellowship of Grace Church where Ryan plays acoustic guitar in the music ministry.

Scott T. Rupp,
Commissioner

Scott T. Rupp was sworn in at the Missouri Public Service Commission in April of 2014. Previously he served two terms in the Missouri State Senate from 2006-2014, and two terms as a State Representative from 2003-2006.

Before his career in public service, Commissioner Rupp founded a college preparatory company, where he assisted parents of high school students in preparing their children for college. Upon his election to the Missouri Senate, he sold his businesses and took a position with UMB Bank, where he served as vice president of business development.

Commissioner Rupp earned his Master of Science degree in Energy and Sustainability through the University of Denver, his MBA from Lindenwood University, and his bachelor’s degree from the University of Missouri. Scott is a member of the 2017 graduating class of the National Renewable Energy Labs’ Executive Leadership Program.

Commissioner Rupp is passionate about providing information to consumers about the energy industry in an easy to understand and straight forward manner. He writes blog posts and produces podcasts about current events in the energy industry, which can be found at his website **SimplifyingEnergy.com**. Commissioner Rupp is also active on social media on the following platforms: **Twitter: @Scott_Rupp LinkedIn: ScottRupp1.**

Maida J. Coleman,
Commissioner

Former Senator Maida Coleman was appointed to the Missouri Public Service Commission (MPSC) in August 2015.

In addition to her service on the MPSC, Commissioner Coleman is on the National Association of Regulatory Utility Commissioners (NARUC) Board of Directors and the Broadband Expansion Task Force. She's also on the following three NARUC committees: Consumers and the Public Interest, Telecommunications, and Supplier and Workforce Diversity. Commissioner Coleman is a member of the NARUC and the U.S. Department of Energy's Natural Gas Infrastructure Modernization Partnership. In addition, Commissioner Coleman is a member of the Critical Consumer Issues Forum Advisory Committee, the Center for Public Utilities Advisory Council, and the Advisory Council for the Electric Power Research Institute's Board of Directors.

Commissioner Coleman regularly moderates and speaks for numerous community and energy regulatory events. Commissioner Coleman also facilitated a workshop for the United States Agency for International Development Ethiopia Energy Regulatory Partnership in Addis Ababa, Ethiopia and a Peer Review on Emergency Preparedness and Public Consultation in Colombo, Sri Lanka. Commissioner Coleman is a guest columnist for the *St. Louis County Community News*.

Prior to her appointment, Commissioner Coleman was the Director of the Missouri Office of Community Engagement. She previously served as Executive Director of the Missouri Workforce Investment Board at the Department of Economic Development, and in a leadership role at the Missouri Department of Labor.

From 2001 until 2009, Commissioner Coleman served as a State Representative and State Senator from St. Louis, becoming the first African-American woman in state history to serve as Senate Minority Leader.

While in the Missouri Senate, Commissioner Coleman sponsored the Hot Weather Law which prevents utilities from disconnecting cooling-related service for residential customers during summer weather extremes. She also sponsored legislation that became law to protect children from lead poisoning.

Commissioner Coleman previously held management level positions at the Missouri Secretary of State and the St. Louis Housing Authority. She is a former member of the Board of Directors of Heat-Up/Cool-Down St. Louis.

Commissioner Coleman has a B.A. in Journalism from Lincoln University in Jefferson City and was awarded a Doctor of Humane Letters Degree from Harris-Stowe State University in St. Louis.

Jason R. Holsman,
Commissioner

Commissioner Jason Holsman was appointed to the Missouri Public Service Commission on January 13, 2020 by Governor Mike Parson and was unanimously confirmed by the Missouri State Senate on January 16, 2020. In addition to his responsibilities at the Commission, he was also appointed to serve on the National Association of Regulatory Utility Commissioners Energy Resources and the Environment Committee.

Prior to his appointment, Holsman was elected and served nearly two terms as a Missouri State Senator to the 7th District. While in the Senate, Holsman served on numerous legislative committees, including the Commerce, Consumer Protection, Energy and the Environment Committee, the Education Committee, the General Laws Committee, the Transportation and Infrastructure Committee, and the Veterans' Affairs and Health Committee. He also served as Chairman for the Prescription Drug Transparency Interim Committee.

Holsman was first elected to the Missouri House of Representatives in 2006 and served three terms. In that chamber, he served as Chair of the Committee on Renewable Energy, as well as the Joint Committee on Urban Agriculture, in which he fought for environmental awareness in Missouri. He also sponsored multiple pieces of legislation promoting a sustainable economy through energy independence and food security. He also served on the Joint Committee on Education, Utilities and International Trade and Business.

Before embarking on a career in the Legislature, Holsman dedicated his career to the field of education, becoming a social studies instructor for the Kansas City, Missouri School District. He made his mark by teaching several subjects, coaching varsity athletics, and serving as Chair of the Principal's Advisory Committee, among other responsibilities. Holsman earned Bachelor of Arts degrees in Political Science and U.S. History from the University of Kansas and a Masters of Arts degree in Diplomacy and Military Science from Norwich University in Vermont. In 2004, he earned his Missouri State Teaching certificate from Northwest Missouri State University. In 2017, Holsman also became a licensed real estate agent. Commissioner Holsman currently resides in Kansas City with his wife and two children.

Glen Kolkmeyer,
Commissioner

Commissioner Kolkmeyer was appointed to the PSC by Governor Michael Parson on April 1, 2021. He was unanimously confirmed by the Missouri Senate on May 6, 2021.

Commissioner Kolkmeyer is a former State Representative from District 53, representing Lafayette County and parts of Jackson and Johnson counties. He was re-elected to his fourth and final two-year term to the House in November 2018, where he served as the Chair of the Administration and Accounts Committee.

Commissioner Kolkmeyer is owner and CEO of Energy Transport Solutions, Inc. in Bates City, Missouri, a family owned and operated company that hauls gasoline, diesel, propane and anhydrous ammonia.

Commissioner Kolkmeyer served 20 years as Fire Chief of the Wellington-Napoleon Fire Protection District and served 39 years on the Fire Service. He is a past president of the Missouri Propane Safety Commission, Missouri Propane Gas Association, Lafayette County Firefighters Association and Lafayette County Law Enforcement Restitution Fund. He is a past board member of the Wellington-Napoleon Protection District and the Lafayette County 9-1-1 Board.

Commissioner Kolkmeyer attends Calvary Baptist Church in Odessa. He currently resides in rural Odessa with his wife, Lisa. They have two children, Eric and Emily, and five grandchildren, Aleah, Ean, Lucas, Zoe, and Mia.

William P. Kenney,
Commissioner

Commissioner Bill Kenney was appointed to the Missouri Public Service Commission by Governor Jay Nixon on January 9, 2013. On January 24, 2013, he was confirmed by the Missouri Senate to a six-year term.

Commissioner Kenney was born in San Francisco, California and grew up in Southern California. He received an Associate of Arts Degree from Saddleback Junior College and attended Arizona State University prior to graduating from the University of Northern Colorado with a Bachelor's Degree in Business Management.

Commissioner Kenney was drafted as a quarterback in the National Football League by the Miami Dolphins in 1978. He went on to play professional football for 11 years, 10 with the Kansas City Chiefs.

Commissioner Kenney was elected to the Missouri Senate in 1994 and served the citizens of eastern Jackson County until 2002. From January 2011 until January 2013, Commissioner Kenney was Chief of Staff for Missouri Lieutenant Governor Peter Kinder.

In August of 2013, Commissioner Kenney was appointed to the National Association of Regulatory Utility Commissioners (NARUC) Committee on Gas. Commissioner Kenney also served as Mid-America Regulatory Conference (MARC) President in 2017-2018 and was Chairman of the Missouri Universal Service Board.

Commissioner Kenney left the Commission on May 6, 2021.

COMMISSIONERS

Ryan A. Silvey, Chairman 751-4221
Scott T. Rupp, Commissioner 751-0946
Maida J. Coleman, Commissioner........ 751-4132
Jason R. Holsman, Commissioner 751-0946
Glen Kolkmeyer, Commissioner 526-7796

ADMINISTRATION DIVISION

Loyd Wilson, Director 751-7435
Douglas Anderson, Legislative Director........ 522-8708
Jay Eastlick, Manager-Consumer Services........ 751-3160
John Hanauer, Manager-Information Services 522-2453
Kevin Kelly, Public Relations Director........ 751-9300
Debbie Quick, Public Relations Coordinator 522-2760
Consumer Services Toll-Free Hotline 1-800-392-4211
EFIS Toll-Free Help Desk 1-866-365-0924

GENERAL COUNSEL DIVISION

Shelley Brueggemann, General Counsel 526-7393
Morris Woodruff, Secretary/Chief Regulatory Law Judge 751-2849
Kim Happy, Manager-Data Center 522-6225
Cherlyn Voss, Manager-Regulatory Analysis Department 751-3966

INDUSTRY ANALYSIS DIVISION

Jim Busch, Director 751-7529
Claire Eubanks, Manager-Engineering Analysis Department 526-2953
Brad Fortson, Manager-Energy Resources Department........ 751-7528
Curtis Gateley, Manager-Water & Sewer Department........ 526-6029
Robin Kliethermes, Manager-Tariff/Rate Design Department 522-3782
Kathleen McNelis, Manager-Safety Engineering Department 751-3456
Justin Smith, Manager-Manufactured Housing Department 526-2833
John Van Eschen, Manager-Telecommunications Department 751-5525
Manufactured Housing Toll-Free Hotline 1-800-819-3180

FINANCIAL & BUSINESS ANALYSIS DIVISION

Mark Oligschlaeger, Director 751-7443
Kim Bolin, Manager-Auditing Department 751-5026
Contessa King, Manager-Customer Experience Department 751-5239
David Sommerer, Manager-Procurement Analysis Department........ 751-4356
Seoungjoun Won, Manager-Financial Analysis Department 526-5164

STAFF COUNSEL DIVISION

Kevin Thompson, Chief Staff Counsel 751-6514

Area Code is 573 unless otherwise noted

JURISDICTION AND GOALS

The Missouri Public Service Commission (Commission or PSC) was created in 1913 by the Public Service Commission Law, now Chapter 386 of the Missouri Revised Statutes. The Commission regulates investor-owned electric, natural gas, steam, water and sewer utilities in Missouri. The Commission also has limited jurisdiction over telecommunications providers in the state. In addition, the Commission regulates the operational safety of the state's rural electric cooperatives and municipally-owned natural gas utilities. The Commission also regulates manufacturers and dealers of manufactured homes and modular units, and enforces initial home or unit installation.

The Commission oversees service territory issues involving investor-owned electric utilities, rural electric cooperatives, municipally-owned electric utilities, investor-owned water and sewer utilities and public water supply districts. Under federal law, the Commission acts as a mediator and arbitrator of local telephone service disputes regarding interconnection agreements.

Virtually every Missouri citizen receives utility service, whether it is electric, natural gas, water, sewer or telecommunications, from a company regulated in some manner by the Commission. Utility services and infrastructure are essential to the economy of Missouri. They provide heating and cooling during extreme temperatures. They offer access to emergency services and vital information systems. They provide safe drinking water and ensure the environmentally sound disposal of wastewater. Because utilities fulfill these essential needs, the Commission must assure the rate paying public that quality services will be available on a nondiscriminatory basis at just and reasonable rates.

COMMISSIONERS

The Commission consists of five commissioners who are appointed by the governor with the advice and consent of the Missouri Senate.

The governor designates one member as the chairman who serves in that capacity at the pleasure of the governor.

Commissioners are appointed to six-year terms. These terms are staggered so that no more than two terms expire in any given year.

COMMISSION

The Commission is both quasi-judicial and quasi-legislative. The Commission is responsible for deciding cases brought before it by the utilities it regulates, as well as by the customers of those utilities, or by other interested stakeholders. Many of the Commission's actions or decisions are made after it hears complaints or applications in which the rights of individuals, ratepayers, utilities, or other stakeholders are determined. Such hearings are held in a trial-like setting using appropriate evidentiary standards. The Commission's decisions are subject to review by Missouri's courts.

PSC STAFF

The Commission is assisted by a staff of professionals in the fields of accounting, consumer affairs, economics, engineering, finance, law and management. Duties range from helping individual consumers with complaints to investigating multi-million dollar utility rate requests.

The PSC Staff participates as a party in all cases before the Commission, conducting audits of the books and records of utilities and making recommendations to the Commission. PSC Staff recommendations, like those filed by other parties to a proceeding, are evaluated by the commissioners in reaching a decision. The Commission has established standards for safety and quality of service to which companies must adhere. Routine and special investigations of utilities are conducted by the PSC Staff to ensure compliance.

WEEKLY AGENDA MEETINGS

The Commission holds weekly agenda meetings to discuss various cases, policies and rulemakings, and to issue its decisions. Those meetings are open to the public and are webcast on the Commission's website (**psc.mo.gov**).

LOYD WILSON
Director

ADMINISTRATION DIVISION

The Administration Division is responsible for managing the Commission's human, fiscal and technical resources. The division has agency wide responsibilities with departments that are responsible for the annual budget, fiscal services and procurement, human resources and payroll. The human resources office includes a position dedicated to training, education and recruiting diverse and qualified job applicants.

The Public Policy and Outreach Department develops and distributes information to the media on agency activities, responds to media requests, and provides utility consumers with educational materials. The division's Legislative Director works closely with the General Assembly and utility representatives in addition to assisting with constituent inquiries. The Information Services Department is responsible for supporting all information technology aspects of the Commission, which requires customized applications, specialized equipment and the highest levels of data security.

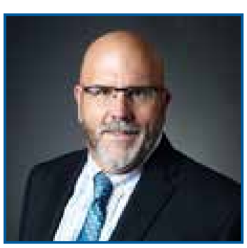
The division also houses the Consumer Services Department, which serves as a clearinghouse for all utility consumer inquiries. Consumer Services investigates and responds to informal complaints to ensure compliance with Commission rules and utility tariffs. When a consumer has an issue that is not satisfactorily resolved after an initial contact with the utility, the consumer may call the Commission's consumer hotline (**1-800-392-4211**) for assistance.

MARK OLIGSCHLAEGER
Director

FINANCIAL AND BUSINESS ANALYSIS DIVISION

The Financial and Business Analysis Division consists of four departments: Auditing, Financial Analysis, Customer Experience and Procurement Analysis. This division provides expertise to the Commission in the areas of utility accounting, auditing, engineering, finance, management, natural gas procurement, service quality and customer experience.

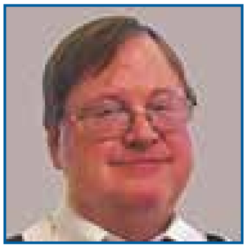
Staff members perform audits, examinations, analyses and reviews of the books and records of the utilities providing service in Missouri. The PSC Staff in this division express their conclusions and findings in the form of expert testimony and recommendations that are filed with the Commission. These departments are also responsible for investigating and responding to consumer complaints and making recommendations to the Commission regarding their resolution.



JIM BUSCH
Director

INDUSTRY ANALYSIS DIVISION

The Industry Analysis Division consists of seven departments: Energy, Resources, Engineering Analysis, Manufactured Housing, Safety Engineering, Tariff/Rate Design, Telecommunications, and Water and Sewer. These departments support the Commission in meeting its statutory responsibilities by providing technical expertise in the following areas: safety and compliance inspections; utility rates, tariffs, rules and regulations; economic analysis; engineering oversight and investigations; and construction inspections. These departments accomplish their mission by making recommendations to the Commission in the form of expert testimony, formal recommendations and presentations.



KEVIN THOMPSON
Staff Counsel

SHELLEY BRUEGGEMANN
General Counsel

STAFF COUNSEL DIVISION

The Staff Counsel Division represents the PSC Staff in all matters related to the regulation of Missouri investor-owned natural gas, electric, water, sewer, steam and telecommunications utilities as well as manufactured housing. Its primary duties include assisting and advising the PSC Staff in the preparation and filing of evidence in legal proceedings, and preparing and presenting legal arguments before the Commission.

GENERAL COUNSEL DIVISION

The General Counsel is authorized by statute to represent the Commission in all actions and proceedings, whether arising under the Public Service Commission Law or otherwise. Attorneys in the General Counsel's Office appear in state and federal trial and appellate courts on behalf of the Commission. When authorized by the Commission, the General Counsel seeks civil penalties from persons or companies that have violated the Public Service Commission Law or the Commission's regulations or orders. The External Litigation Department manages and processes these cases. The General Counsel also provides legal advice to the Commission and each Commissioner as requested.

The Regulatory Analysis Department, within the General Counsel's Division, provides assistance and represents the Commission's interests in various forums related to federal energy issues, including regional transmission organizations (RTOs) and cases before FERC, along with providing technical expertise, support and analysis on state and federal issues facing the Commission.

The Adjudication Department is the Commission's quasi-judicial component and is part of the General Counsel Division. Regulatory law judges within the Adjudication Department handle cases from their filing until their resolution. The judge assigned to a case presides over any hearing, rules on objections and motions, and drafts orders, as directed or delegated by the Commission.

MORRIS WOODRUFF
Secretary of the Commission /
Chief Regulatory Law Judge

SECRETARY OF THE COMMISSION / CHIEF REGULATORY LAW JUDGE

The Secretary of the Commission is statutorily responsible for the records of the Commission and, acting through the Data Center, manages, maintains and preserves the official case files, tariffs and other official documents of the Commission. The Secretary, again acting through the Data Center, receives all incoming pleadings and issues all Commission orders.

The Chief Regulatory Law Judge oversees the operations of the Adjudication Department.

GENERAL ISSUES

COVID-19 Pandemic

This past year, Missourians have continued to be impacted by the COVID-19 pandemic. All of the regulated public utilities have continued to provide safe and reliable service through the COVID-19 pandemic, and the Commission has supported the utilities' voluntary efforts to support their customers during this difficult time.

During the 2021 fiscal year, the Commission took a number of actions including: approving tariffs filed by Spire Missouri, Inc. (Spire Missouri) to help small business customers struggling as a result of the COVID-19 pandemic (**Case No. GT-2021-0099**); granting a request filed by Spire Missouri to extend its COVID-19 Residential Assistance Program which originally took effect in November of 2020 (**Case No. GU-2020-0376**); and granting Union Electric Company d/b/a Ameren Missouri's (Ameren Missouri) request to temporarily increase the qualifying federal poverty level associated with its Keeping Current Low Income Pilot Program so that Ameren Missouri could provide assistance to additional customers during the COVID-19 pandemic (**Case No. ET-2021-0304**).

The Commission also approved agreements in cases filed by Spire Missouri (**Case No. GU-2020-0376**), Missouri-American Water Company (**Case No. WU-2020-0417**), Evergy Missouri Metro and Evergy Missouri West (**Case No. EU-2020-0350**), and Ameren Missouri (**Case Nos. EU-2021-0027 and GU-2021-0112**) which sought Accounting Authority Orders (AAOs) to track costs and financial impacts associated with the COVID-19 pandemic.

COVID-19 Emergency Working Case

(Case No. AW-2020-0356)

On May 13, 2020, the Commission issued its *Order Opening A Working Case to Consider Best Practices for Recovery of Past-Due Utility Customer Payments after the Covid-19 Pandemic Emergency*. In its Order, the Commission noted that in response to the pandemic, utilities have taken action to suspend disconnections for customer non-payment of utility bills. The Commission stated, "As a result of those economic disruptions and continued provision of utility service to customers who are unable to pay for those services, the utilities will likely experience a sharp rise in the level of past-due customer-payment accounts-receivable. Once the emergency has passed, the utilities will be faced with the question of how to collect those past-due accounts-receivable without unduly burdening their vulnerable customers."

Comments were filed by utilities and interested stakeholders. The PSC Staff (Staff) filed a report summarizing the comments and providing other relevant background information on August 3, 2020.

Beginning in September 2020, Staff was required to file a monthly report that summarized the utilities' responses to the following questions:

(1) (a) the number of disconnections for non-payment of services as of each month-end; (b) the number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define "past-due;" (c) the number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end; and (d) the number of customers at each month-end participating in payment plans.

(2) Please provide your company's estimate of the number of disconnections for non-payment of service for the six-month period of September 2020 through February 2021, with an explanation of the methodology assumptions used to develop these projections.

(3) Please provide the same information requested in (1) (a) through (1) (d) applicable to your Company's August 2019 through February 2020 billing cycles.

Staff will continue to file monthly updates through at least February 2022.

February 2021 Cold Weather Event (Winter Storm Uri)

(Case No. AO-2021-0264)

In February 2021, much of the Midwest, including Missouri, experienced unseasonably cold temperatures which resulted in rolling electrical blackouts and extreme natural gas price spikes. On February 24, 2021, the Commission opened a docket and ordered Staff to investigate the impact of the cold weather event on investor-owned utilities and their customers. This docket was opened to investigate Missouri electric and natural gas utilities' preparation for and response to the extreme cold weather event.

The Commission also conducted a workshop with Missouri utilities presenting additional information related to potential consequences and options to mitigate the impact of the February 2021 extreme cold weather event.

On April 15, 2021, Staff filed a motion requesting the Commission open 10 additional files, one for each investor-owned electric and natural gas utility. On April 30, 2021, Staff filed its report detailing the results of its investigations into the issue.

COMMISSION RULEMAKINGS

Current Working Cases

(Case No. EW-2021-0267)
On February 24, 2021, the Commission opened a working docket to evaluate how the Commission may best respond to changes from implementation of **FERC Order 2222**. The Commission directed investor-owned utilities to respond and requested input from interested stakeholders. On June 29, 2021, the Commission hosted an informational workshop featuring a selection of panelists familiar with Demand Response (DR) and Distributed Energy Resource (DER) Aggregation. In August 2021, the Commission invited interested stakeholders to comment on the temporary prohibition of Aggregators of Retail Customers (ARCs) in Missouri. Comments were to be filed no later than September 1, 2021 with a Staff report due by October 1, 2021.

(Case No. EW-2021-0104)
On October 14, 2020, the Commission opened a working docket to determine whether continued membership of Missouri investor-owned utilities in Regional Transmission Organizations (RTOs) is in the best interest of ratepayers. The Commission identified several factors to be evaluated in this matter, including benefits of membership in RTOs, monetized values of those benefits, and time horizon for conducting such evaluations.

The Commission ordered Staff to investigate the issue and asked Ameren Missouri, Evergy, and The Empire District Electric Company d/b/a Liberty (Empire) to answer a series of questions on RTO membership benefits, costs, and appropriate time period for studying them. The PSC Staff provided a report summarizing the received comments and recommended that the Commission order Missouri electric companies to provide revenue requirement impact of RTO membership and identify a hypothetical exit time that would reflect the most depreciation for existing projects.

(Case No. EW-2021-0077))
On September 23, 2020, a working docket was opened to consider an amendment to the Commission's cogeneration rule, 20 CSR 4240-20.060. An amendment to the Commission's rule regarding cogeneration had previously been considered in **Case No. EX-2020-0006**, however, recent guidance by FERC regarding the Public Utilities Regulatory Policies Act (PURPA) prompted the need for additional evaluation of the proposed amendment.

On October 14, 2020, various stakeholders responded to the PSC Staff's draft version of the rule and its request for comments. A workshop was held in January 2021, followed by a PURPA informational workshop in April 2021 to discuss different aspects of the potential changes to the cogeneration rule.

(Case No. AW-2021-0064)
On September 16, 2020, the Commission opened a working docket to consider an amendment of the Commission's rules on electric, gas, and water utility standards of quality. Initial comments have been filed. Staff continues to work with stakeholders on the draft rulemakings.

(Case No. AW-2021-0070)
On September 23, 2020, the Commission opened a working docket to consider a Commission rule regarding revenue stabilization mechanisms. Initial comments from various stakeholders have been filed. Staff continues to work with stakeholders on the draft rulemakings.

(Case Nos. AW-2018-0393, AW-2018-0394, WW-2018-0392)
At the direction of the Commission, Staff is considering comments stakeholders filed and presented at workshops regarding the Commission's Affiliate Transactions Rules. Staff filed amendments to the Affiliate Transactions Rules with the intent to incorporate water and sewer utilities, to clarify language and to streamline filing requirements.

In early 2020, the Commission directed utilities to provide an estimate of the cost of complying with draft rules. Staff continues to work with stakeholders on the draft rulemakings.

(Case No. AW-2018-0385)
In June 2018, the Commission opened this docket to assist Staff in its review and consideration of a rewrite of the Commission's rules regarding electric and natural gas promotional practices into a single promotional practices rule. Staff prepared a draft of a revised and consolidated rule. A workshop was held in January 2020, and stakeholders provided comments. Staff continues to work with stakeholders on the draft rulemakings.

(Case No. AW-2020-0148)
In November 2019, the Office of the Public Counsel (OPC) filed a motion asking the Commission to open a working docket to address a proposed rule OPC drafted to establish standardized reporting requirements for utilities to facilitate proper data collection regarding residential customer service disconnection policies and practices, and to discuss any other concerns related to the collection and aggregation of customer disconnection data. The Commission opened the working case on December 11, 2019. On November 18, 2020, a workshop was held. Staff continues to work with stakeholders on the draft rulemakings.

(Case No. EW-2020-0377)
On May 28, 2020, the Commission opened a working docket to assist Staff in its consideration of amendments to the Commission's rule on electric utility renewable energy standard requirements found at 20 CSR 4240-20.100. Staff's motion asking the Commission to initiate the file includes details about the problems Staff has identified with the existing rule and possible solutions to those problems. Initial stakeholder comments were provided on June 29, 2020. On May 26, 2021, Staff filed a Motion for Comments on Proposed Rule Amendments. On July 30, 2021, various comments were filed. Staff continues to work with stakeholders on the draft rulemakings.

STATE LEGISLATION

Earlier this year, Senate Bill 44 was signed as one of two major pieces of utility legislation. An omnibus bill, Senate Bill 44 had a number of provisions impacting both the Commission and investor-owned utility (IOU) customers. The bill enacted into law several provisions, including a pre-emption of political subdivisions from restricting utility connections based off of the source of energy, increased the statutory maximum assessment that funds the Commission, and expanded the existing water infrastructure system replacement surcharge (ISRS) into a new Water and Sewer Infrastructure Act (WSIRA) program.

Under the new WSIRA program, the surcharge mechanism is expanded statewide to any customer of a water or sewer corporation that provides service to more than 8,000 customer connections. The previous ISRS program was geographically restricted to St. Louis County. In addition, under the WSIRA, the types of infrastructure eligible to be recovered upon is expanded beyond the existing ISRS categories of water mains, valves, hydrants, their cleaning/relining, and facility relations due to construction to include a number of other components. A full list of the newly eligible infrastructure components may be found in § 393.1503(7). The rate cap for revenue received under the WSIRA is also increased from 10 percent for the former ISRS to 15 percent of total revenues under the WSIRA.

A second utility omnibus bill, House Bill 734, was also approved by the legislature and signed into law by Governor Parson. Notable provisions of House Bill 734 direct the Commission to promulgate rules to facilitate renewable natural gas program creation, require the Commission to utilize certain cost allocation methodologies in rate cases, and permits investor-owned utilities to securitize certain costs associated with natural disasters and the retirement of electric generating facilities. In this case, securitization takes existing debt of the IOU and turns it into customer-backed bonds which are sold in the financial markets. Customer-backed bonds refers to the fact that the debt service on the bond is paid by a dedicated line item on a customer's bill that exists independent of utility usage.

Securitization legislation has increasingly been adopted across the country as a means of reducing the total overall cost to utility customers for large scale expenses such as wildfire/hurricane recovery and facilitating the retirement of coal plants in favor of renewable energy sources.

ELECTRIC

The Empire District Electric Company

(Case No. ER-2019-0374)
On August 14, 2019, The Empire District Electric Company d/b/a Liberty (Empire) filed an electric rate case with the Commission seeking to increase annual electric revenues by approximately $26.5 million.

According to the Empire filing, recovery of new investments made since April 2016, increased costs for property taxes and depreciation expense stemming from the additional capital investment and normal and inflationary increases in operating costs were among the factors creating the need for increased customer rates.

On July 23, 2020, the Commission issued its Amended Report and Order for this case increasing Empire's revenues by approximately $992,400.

As part of the Commission's decision, Empire will establish an Accounting Authority Order (AAO) to defer costs and revenues associated with the closure and retirement of the Asbury power plant.

Ameren Missouri

(Case No. ER-2021-0240)

On March 31, 2021, Ameren Missouri filed an electric rate case with the Commission seeking to increase annual electric revenues by approximately $299 million. According to Ameren Missouri, the main drivers of the requested rate increase are inclusion in rates of its recent investments in the Ameren Missouri system as part of its "Smart Energy Plan," as well as the inclusion in rates of two new wind farms (the "Atchison" and "High Prairie" Energy Centers) to be used for compliance with the Missouri Renewable Energy Standard. Another material driver for this filing is Ameren Missouri's request to increase its authorized depreciation rates for the Sioux and Rush Island coal generating facilities to reflect the earlier retirement dates now planned for these units.

Staff, the Office of Public Counsel and other intervening parties filed their recommendations with the Commission regarding Ameren Missouri's rate increase request on September 3, 2021. Evidentiary hearings are scheduled for this case from November 29 through December 10, 2021. The order establishing just and reasonable rates will be effective no later than February 28, 2022.

The Empire District Electric Company

(Case No. ER-2021-0312)

On May 28, 2021, The Empire District Electric Company d/b/a Liberty (Empire) filed an electric rate case with the Commission seeking to increase annual electric revenues by approximately $79.9 million. According to Empire, the main drivers of the requested rate increase are to seek to include in rates its new investments in (a) 600 MW of wind generation, (b) its first Community Solar generating facility, and (c) its new Automated Meter Infrastructure program. The rate increase request also reflects recovery of approximately $29.9 million of costs incurred by Empire associated with "winter storm Uri" in February 2021; however, Empire now intends to seek rate recovery of those costs through a separate "securitization" application pursuant to new legislation that went into effect this summer.

Staff, the Office of Public Counsel and other intervening parties are scheduled to file their recommendations with the Commission regarding Empire's rate increase request on October 29, 2021. Evidentiary hearings are scheduled for this case from January 31 through February 10, 2022. The order establishing just and reasonable rates will be effective no later than April 25, 2022.

OTHER ELECTRIC ISSUES

Ameren Transmission Company of Illinois (ATXI)

(Case No. EA-2021-0087)

On September 25, 2020, ATXI provided notice of its intent to file a CCN application for a new 138 kV transmission line in the Missouri counties of Perry and Cape Girardeau, as well as the construction of a 138 kV to 161 kV switching station. Subsequently, ATXI filed direct testimony to support its application. Hearings in this matter are scheduled for October 21-22, 2021, in Jefferson City.

Ameren Transmission Company of Illinois (ATXI)

(Case No. EA-2021-0167)

On December 11, 2020, ATXI submitted an application seeking a CCN to operate and maintain interconnection facilities consisting of a 345 kV switchyard in Schuyler County, Missouri for its Mark Twain transmission line. On January 19, 2021, Staff filed a memorandum detailing its investigations into ATXI's CCN application and recommended the application be approved. On February 10, 2021 the Commission issued an order granting ATXI a CCN.

Ameren Missouri

(Case No. EA-2020-0371)
On October 28, 2020, Ameren Missouri filed an application seeking a CCN to construct, install, own, operate and maintain a solar generating facility in Montgomery County near New Florence, Missouri. This would serve as the second program resource for Ameren Missouri's Community Solar Pilot Program. Previously, Ameren Missouri was granted a CCN for its St. Louis Lambert International Airport solar generating facility.

The Commission approved an agreement reached in the case. The Commission stated in its order that the application demonstrates and the parties to the agreement have agreed that: 1) There is a need for the service; 2) Ameren Missouri is qualified to provide the proposed service; 3) Ameren Missouri has the financial ability to provide the service; 4) Ameren Missouri's proposal is economically feasible; and 5) The service promotes the public interest.

Ameren Missouri Deployment of Automated Metering Infrastructure

(Case No. EE-2019-0382)
On July 29, 2020, the Commission approved an agreement reached by various parties in a case filed by Ameren Missouri seeking a variance from some of its tariffs and some of the Commission's rules allowing Ameren Missouri to implement its Advanced Metering Infrastructure (AMI).

The agreement approved by the Commission addressed enhanced disconnection notice content and communications, disconnection timing, outreach to elderly and disabled customers, medical equipment registry enhancements, a dedicated web page, reconnection and opt-out fees, disconnection notices and call scripts and Ameren Missouri's Keeping Cool Program.

In May 2020, the Commission approved a partial agreement which addressed variances related to customer meter readings, beginning and ending meter readings and estimation routine.

Empire Community Solar Pilot Program

(Case No. ET-2020-0259)
On September 30, 2020, the Commission approved a tariff filed by Empire implementing a Community Solar Pilot Program.

The Community Solar Pilot Program is designed to provide Empire customers the opportunity to subscribe voluntarily to the generation output of solar facilities owned and operated by Empire within its service territory and connected to its distribution system.

Fuel and Purchased Power (FAC) Prudence Reviews

All four investor-owned electric utilities, Ameren Missouri, Empire, Evergy Missouri Metro, and Evergy Missouri West, have Commission-approved Fuel Adjustment Clauses (FACs). Through the FAC, the electric utility recovers from or refunds to customers 95% of their fuel and purchased power costs, net of off-system sales revenues, which have been under-collected or over-collected relative to a base amount set in the utility's last general rate case.

Commission rules require that a prudence review of the costs and revenues subject to each approved FAC be conducted by Staff no less frequently than at 18-month intervals.

In fiscal year 2021, Staff completed a prudence review of fuel and purchased power costs and revenues included in the FAC of Ameren Missouri (**Case No. EO-2021-0060**). Relative to its FAC, Staff investigated Ameren Missouri to determine whether the conduct of the utility's decision-makers was reasonable at the time. As a result of this prudence review, Staff found no imprudence by the decision-makers of Ameren Missouri.

Electric Utility Resource Planning Filings

The Commission's policy goal in promulgating the Chapter 22 Electric Utility Resource Planning rule was to set minimum standards to govern the scope and objectives of the resource planning process that is required of electric utilities subject to its jurisdiction in order to ensure that the public interest is adequately served.

The fundamental objective of the Chapter 22 Electric Utility Resource Planning process is to provide the public with energy services that are safe, reliable, and efficient, at just and reasonable rates, in compliance with all legal mandates, and in a manner that serves the public interest and is consistent with state energy and environmental policies.

The fundamental objective also requires that the utility consider and analyze demand-side resources, renewable energy, and supply-side resources on an equivalent basis, subject to compliance with all legal mandates that may affect the selection of electric utility energy resources, in the resource planning process. Further, Chapter 22 requires that electric utilities file each year either a triennial compliance filing or an annual update filing to comply with 20 CSR 4240-22.080(1) or 20 CSR 4240-22.080(3), respectively.

Ameren Missouri filed a triennial compliance filing on September 27, 2020 (**Case No. EO-2021-0021**).

Empire filed an annual update filing on March 22, 2021 (**Case No. EO-2021-0289**).

Evergy Missouri Metro filed a triennial compliance filing on April 30, 2021 (**Case No. EO-2021-0035**).

Evergy Missouri West filed a triennial compliance filing on April 30, 2021 (**Case No. EO-2021-0036**).

Missouri Energy Efficiency Investment Act

The purpose of the Missouri Energy Efficiency Investment Act (MEEIA), Section 393.1075 RSMo, is to encourage investor-owned electric utilities to develop and implement demand-side management (DSM) programs that modify the net consumption of electricity on the retail customer's side of the electric meter.

Rules to implement MEEIA provide procedures for filing and processing applications for approval, modification, and discontinuance of electric utility demand-side programs and for the establishment and operation of demand-side program investment mechanisms (DSIM), and also allow for periodic adjustments in customer rates between general rate cases related to the recovery of 1) DSM program costs, 2) lost fixed operating costs due to the programs, and 3) an earnings opportunity based on after-the-fact measured and verified energy and demand savings.

On June 4, 2018, Ameren Missouri requested approval of a MEEIA Cycle 3 application (**Case No. EO-2018-0211**). On October 25, 2018, the Commission approved a Stipulation and Agreement resolving this case. Ameren Missouri's MEEIA Cycle 3 went into effect on March 1, 2019. On May 13, 2020, Ameren Missouri filed for a one-year extension to its MEEIA Cycle 3. On August 5, 2020, the Commission approved Ameren Missouri's MEEIA Cycle 3 extension.

Commission rules require that a prudence review of the costs subject to each approved DSIM be conducted by Staff no less frequently than at 24-month intervals. Any amounts ordered refunded by the Commission shall include interest at the electric utility's short-term borrowing rate.

In fiscal year 2021, Staff completed its first prudence review of MEEIA Cycle 3 costs and MEEIA Cycle 2 long-lead projects for the DSIM of Ameren Missouri (**Case No. EO-2021-0157**). Staff investigated the utility to determine whether the conduct of the utility's decision-makers was reasonable at the time, under all the circumstances.

As a result of its fiscal year 2021 DSIM prudence review, Staff found that Ameren Missouri imprudently included certain non-MEEIA costs in its DSIM. Subsequently, the Commission ordered that $153,732.06 in this case, which includes interest, and $50,000 from the previous case, plus interest, that was inadvertently omitted from the Company's previous DSIM Rider rate adjustment, be returned to Ameren Missouri customers in its next DSIM Rider rate adjustment filing.

NATURAL GAS

Spire Missouri
(Case No. GR-2021-0108)

On December 11, 2020, Spire Missouri filed a natural gas rate case with the Commission seeking to increase annual base gas revenues by approximately $112 million. Of this requested amount, approximately $47 million is already being charged to customers through the Infrastructure System Replacement Surcharge (ISRS) rate mechanism. According to Spire Missouri, almost all of the requested increase is associated with inclusion in rates of new natural gas investments that were added to its system since its last general rate case decided in 2018. As part of this case, Spire Missouri is also proposing to combine its current tariffs and tariff rules into one set applicable to both its east and west operating units.

Staff, the Office of Public Counsel and other intervening parties filed their recommendations with the Commission regarding Spire Missouri's rate increase request on May 12, 2021. Evidentiary hearings were held for this case from August 2 through August 13, 2021.

Ameren Missouri
(Case No. GR-2021-0241)

On March 31, 2021, Ameren Missouri filed a natural gas rate case with the Commission seeking to increase annual gas revenues by approximately $9.4 million.

According to Ameren Missouri, the main driver of the requested rate increase is to include in rates its recent investments in the Ameren Missouri gas system. This filing also fulfills Ameren Missouri's previous commitment in its last natural gas rate case to file its next natural gas rate case at the same time that it filed its next electric rate case.

The procedural schedule ordered for Ameren Missouri's gas rate increase case is the same as the one ordered for Ameren Missouri's concurrent electric rate increase case **(Case No. ER-2021-0240)**.

Staff, the Office of Public Counsel and other intervening parties filed their recommendations with the Commission regarding Ameren Missouri's rate increase request on September 3, 2021. Evidentiary hearings are scheduled for this case on November 29 to December 10, 2021. The order establishing just and reasonable rates will be effective no later than February 28, 2022.

Spire Missouri

(Case No. GA-2021-0010)
On September 16, 2020, the Commission approved an application filed by Spire Missouri, on behalf of its Spire West operating unit, seeking a CCN to construct, own, operate and maintain a natural gas distribution system providing service in Cass County. The CCN is a further expansion of the Company's existing certificated area.

Spire Missouri sought the CCN to provide natural gas service to two projects in Cass County. The first involves an industrial park while the second project would serve commercial customers with the potential to serve residential customers.

PROCUREMENT ANALYSIS

Natural Gas ACA Activities

There are several natural gas local distribution companies (LDC) serving Missouri – Ameren Missouri, Liberty Utilities, The Empire District Gas Company, Spire Missouri Inc. (Spire East and Spire West), and Summit Natural Gas of Missouri.

The Procurement Analysis Department conducts an annual Actual Cost Adjustment (ACA) review for each natural gas local distribution company after the LDCs close out their records following the end of each ACA period. A primary purpose of the ACA process is to reconcile the company's actual gas costs with what it charged customers (its billed revenues).

In its purchased gas adjustment (PGA) filings, the company estimates its gas costs for the upcoming year. In the ACA, the estimate is reconciled with the actual prudently incurred cost of gas. In this function, the Procurement Analysis Department reviews the LDC's true-up of gas costs for the period under review. A comparison of billed revenue recovery with actual gas costs will normally yield either an over-recovery or under-recovery of the ACA balances to be either returned to customers or charged to customers, respectively.

Another purpose of the ACA process is to examine the prudence of the LDC's gas purchasing and operating decisions during the ACA period. For its analysis, the Procurement Analysis Department reviews the estimated peak day requirements and the capacity levels to meet those requirements; peak day reserve margin and the rationale for this reserve margin; natural gas supply plans for various weather conditions; and hedging activities for the ACA period.

In its prudence reviews, the Procurement Analysis Department will consider the financial impact on customers of the LDC's use of its gas supply, transportation, and storage contracts in light of the conditions and information available when the operational decisions were made.

In February 2021, cold weather combined with tight midcontinent natural gas supplies impacted Missouri LDCs, along with other midwestern LDCs. On February 22, 2021, the Commission opened a case to examine impacts and causes of the cold weather event. The Procurement Analysis Department assisted in this review.

Other Proceedings

Although focused largely on natural gas ACA activities, because of its knowledge of natural gas issues, the Procurement Analysis Department also assists in the review of LDC complaint cases, certificate cases, proposed tariff changes, and natural gas rate cases. The Procurement Analysis Department also assisted in the review of affiliated transactions that impacted the recovery of gas costs.

The Procurement Analysis Department is also responsible for the rate design review of gas Infrastructure System Replacement Surcharges (ISRS).

NATURAL GAS PIPELINE SAFETY PROGRAM

The Commission has safety jurisdiction over intrastate natural gas pipeline operators in Missouri. In 2020 this included: six intrastate transmission-only pipelines; the transmission and distribution natural gas pipeline systems operated by six investor-owned natural gas distribution utilities; 41 municipally-owned natural gas systems; the natural gas distribution system at Fort Leonard Wood; and eight master meter systems.

In 2020, there were a total of 62 natural gas operators over which the Commission had safety jurisdiction, operating approximately 1,000 miles of intrastate natural gas transmission pipelines, over 28,000 miles of distribution main pipelines, and over 1.5 million natural gas service lines.

The primary function of the PSC Safety Engineering Department Staff is to perform inspections and investigations of natural gas pipeline operators and systems for compliance with the Commission's pipeline safety rules. PSC Safety Engineering Department Staff are in the field throughout the year inspecting jurisdictional pipeline operators and systems.

During the 2020 calendar year, PSC Safety Engineering Department Staff conducted over 130 individual inspections, including comprehensive records and field, compliance follow-up, construction, operator qualification, temporary/mobile liquefied natural gas, distribution integrity management, anti-drug and alcohol misuse programs, and incident investigations.

The Commission's natural gas pipeline safety program is carried out under a cooperative agreement with the U.S. Department of Transportation – Pipeline and Hazardous Materials Safety Administration (PHMSA). The Commission adopts federal pipeline safety regulations and has promulgated some additional, more stringent rules. The Commission is in the process of adopting recent amendments to applicable federal pipeline safety regulations into Commission rules in **Case No. GX-2021-0406**. The Commission's rules applicable to pipeline safety are in 20 CSR 4240-40.020, .030, .033 and .080.

The Commission takes a proactive approach to improving the safety and integrity of each pipeline system under its jurisdiction. PSC Safety Engineering Department Staff conduct on-site inspections, including: evaluation of operator responses to reported leaks and pipeline damages, pipeline corrosion control, construction and integrity management, operator procedures and qualifications, public awareness programs, control room procedures and operations, and incident investigations.

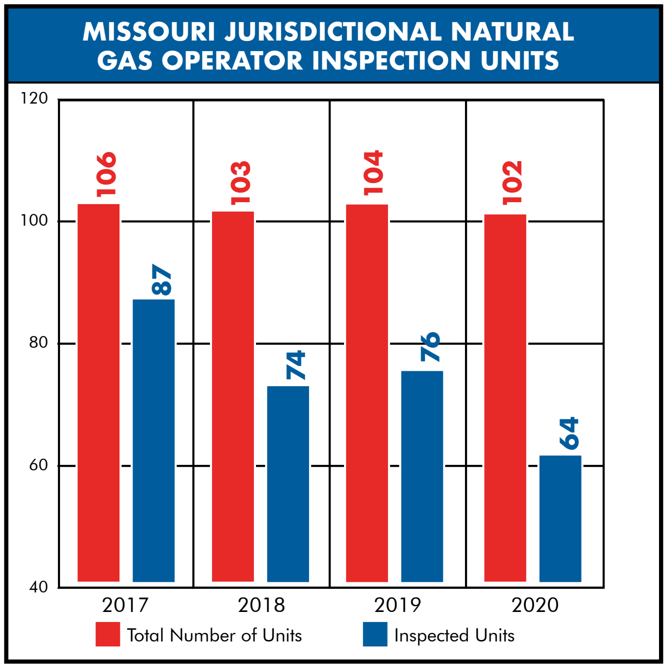
COVID-19 Related Waivers

In response to the national COVID-19 emergency, the Commission granted temporary waivers from certain pipeline safety rules and prior Commission orders. On March 25, 2020, the Commission granted a temporary waiver from a pipeline safety rule requiring natural gas service providers to enter customer premises to visually inspect customer piping following turn-on of natural gas. This waiver was applicable to all private and municipal gas systems providing natural gas distribution service in Missouri. The initial term of this waiver ended on June 16, 2020. On July 15, 2020, the Commission extended the term of the waiver through December 31, 2020, with additional requirements for recordkeeping and customer notifications. On January 27, 2021, the Commission extended the term of the waiver through March 31, 2021 **(Case No. GE-2020-0297).**

On June 11, 2020, the Commission granted temporary waivers to Spire Missouri for the Spire East and Spire West service areas to allow Spire time to adapt to the disruption caused by COVID-19. One waiver permitted Spire to defer certain safety inspections on Spire owned facilities installed inside customer premises until December 31, 2020, and a second order approved delays in Spire's scheduled replacement of cast iron and unprotected steel pipe. The Commission granted a motion from Spire to extend the waiver to defer certain safety inspections on Spire owned facilities installed inside customer premises through March 31, 2021. The Commission granted in-part a subsequent motion from Spire, extending the waiver to defer certain safety inspections on Spire owned facilities installed inside customer premises through July 31, 2021 **(Case No. GE-2020-0373).**

Prevention of Excavation Damage to Natural Gas Pipelines

The Commission was awarded a grant by PHMSA to research best practices that have been used by other entities, and engage operators of pipelines in Missouri in a process that will result in the development of statewide practices for locating quality assurance. The Commission conducted a public workshop to engage stakeholders on June 17, 2021. The project deliverable will be a compilation of best practices for locating quality assurance which will be distributed to natural gas operators throughout the state and made publically available to other interested parties **(Case No. GW-2021-0355).**



FEDERAL NATURAL GAS AND ELECTRIC CASES

The Missouri Public Service Commission (MoPSC) actively participates in proceedings at the Federal Energy Regulatory Commission (FERC) because FERC regulates interstate natural gas and electric companies and its decisions directly affect Missouri natural gas and electric customers.

The MoPSC filed its notice of intervention (NOI) in 18 cases at FERC during the fiscal year ending June 30, 2021. An NOI allows the MoPSC to participate in a case before FERC as a party to the case. As a party to a FERC case, the MoPSC has access to all confidential documents provided to parties throughout the case and may participate in settlement negotiations to resolve any issues brought by the parties to the case. In FERC cases where the MoPSC has specific concerns, either comments or a protest may be filed. The MoPSC filed either comments or protests in three of the cases to which it was a party in fiscal year 2021.

The MoPSC continued to negotiate settlements in cases from prior fiscal years. The MoPSC also monitors a variety of FERC cases filed from other regions of the country where it does not file an NOI, when issues that may have a future impact on Missouri are raised.

FEDERAL NATURAL GAS ACTIVITIES

FERC regulates interstate natural gas pipeline companies and its regulatory decisions directly affect Missouri natural gas consumers. The MoPSC actively participates at FERC in company-specific and generic proceedings, focusing on those pipelines having the greatest impact on Missouri consumers and/or those where representation of Missouri interests is otherwise limited or absent. The MoPSC strives to ensure that Missouri consumers receive reliable natural gas transportation service at reasonable rates.

Missouri's Local Distribution Companies (LDCs), including both natural gas utilities and electric utilities that generate energy with natural gas-powered combustion turbines, must rely on FERC-regulated interstate pipelines for storage and delivery of their natural gas supplies. Currently 13 interstate pipelines physically located within the boundaries of the state of Missouri are able to serve Missouri utility companies, with an additional 4-6 upstream pipelines providing transportation and, in some cases, natural gas storage service.

Three pipelines deliver the majority of the state's natural gas to Missouri LDCs: Panhandle Eastern Pipe Line Company, LP (Panhandle), Southern Star Central Gas Pipeline Inc. (Southern Star), and Enable Mississippi River Transmission Corporation, LLC (MRT). Southern Star has several pipelines that serve the Kansas City, St. Joseph, Springfield and Joplin areas as well as a small lateral terminating in St. Louis. Panhandle serves Kansas City, central Missouri and St. Louis. MRT serves St. Louis and portions of southeast Missouri. In addition, Natural Gas Pipeline Company of America (NGPL), Ozark Gas Transmission, LLC and Texas Eastern Transmission serve southeastern Missouri; Tallgrass Interstate Gas Transmission, LLC and KPC Pipeline, LLC serve the

Kansas City area; ANR Pipeline Company serves northern Missouri; Spire STL Pipeline serves the St. Louis area and parts of Illinois, and MoGas Pipeline serves from St. Louis to Rolla. Rockies Express Pipeline, LLC also crosses Missouri.

Spire STL Pipeline

(FERC Docket No. CP17-40)

Spire STL Pipeline filed an application for a CCN on January 26, 2017, to construct, own and operate a new interstate natural gas pipeline to serve the St. Louis, Missouri area. Spire Missouri entered a precedent agreement with Spire STL Pipeline, its affiliate, for firm transportation capacity to deliver natural gas to its LDC customers.

Thirteen parties intervened, with three protesting and the MoPSC filing a conditional protest in the case, and five submitting supporting comments. The overriding concerns the protests raised revolved around the lack of need for a new pipeline which could result in adverse rate impacts to existing competing pipelines and their captive customers.

The MoPSC's conditional protest requested FERC thoroughly examine all of the circumstances and impacts of the proposed pipeline as it determines whether Spire STL Pipeline has shown that construction of the pipeline is in the public interest in light of the capacity needs for the areas served, and not inadvertently expand its decision into traditionally state jurisdictional decision-making authority, along with raising concerns regarding the Return on Equity (ROE), capital structure, and shifting of risk of the project from the pipeline to its customers. FERC approved the CCN, noting that the prudence and reasonableness of Spire Missouri's decision to enter the precedent agreement and obtain transportation service from Spire STL Pipeline are squarely within the jurisdiction of the MoPSC.

The majority of the pipeline was constructed in Illinois connecting to the Rockies Express Pipeline to provide the St. Louis area with access to shale gas from the eastern United States. However, Spire STL Pipeline experienced a number of delays in completion of the pipeline application.

On October 28, 2019, FERC issued an order amending the CCN and approving a rate increase for additional construction costs associated with flooding along the Missouri and Mississippi Rivers in 2019. Spire STL Pipeline commenced service on November 18, 2019, for its facilities in St. Louis and St. Charles Counties in Missouri and Scott, Greene and Jersey Counties in Illinois. The last remaining section of pipe was to be completed by the spring of 2020.

In May of 2020, citing suspension of construction activities due to COVID-19, Spire STL Pipeline requested a one-year extension of time to complete the project. On June 18, 2020, FERC granted Spire's request for a one-year extension through August 3, 2021, to complete and put into service the last section of the pipeline. On October 30, 2020, FERC granted Spire STL Pipeline's request to commence service on the remaining facilities. These remaining facilities were placed in service on November 4, 2020.

The Environmental Defense Fund (EDF) filed a Petition for Review on January 23, 2020 with the D.C. United States Court of Appeals. On June 22, 2021, the D.C. Circuit issued its decision vacating the FERC Certificate Order and the Rehearing Order. The MoPSC continues to monitor the case.

Panhandle Eastern Pipe Line Company (Panhandle)

(FERC Docket Nos. RP19-78 and RP19-1523)

FERC issued **Order No. 849** on July 18, 2018, requiring natural gas pipeline companies to file FERC Form No. 501-G to assist FERC in determining which jurisdictional natural gas pipelines may be collecting unjust and unreasonable rates in light of the income tax reductions provided by the Tax Cuts and Jobs Act. FERC subsequently instituted an investigation of the rates for Panhandle (**RP19-78**) and its affiliate, Southwest Gas Storage Company (Southwest) (**RP19-257**) alleging that information provided on their 501-G forms indicated both entities were overearning and collecting unjust and unreasonable rates.

The MoPSC intervened in both investigation cases with at least 35 other parties, including Ameren Missouri and Spire Missouri. The Southwest investigation case settled with a $6 million rate reduction, while the issue of a

negotiated contract between Panhandle and Southwest was consolidated with the Panhandle investigation. Panhandle is Southwest's only customer. Panhandle filed a rate case on August 30, 2019, (**RP19-1523**) seeking a cost of service (COS) of $408 million that was also consolidated into the Panhandle investigation. The initial impact of the Panhandle rate case filing eliminated the benefit of the Southwest rate reduction from Panhandle's COS so that customers would never realize the Southwest $6 million reduction in rates.

The FERC Staff filed testimony in the Panhandle rate case supporting a $236 million COS, $172 million less than requested by Panhandle. Several Panhandle customers (including Ameren Services), customer groups (including municipal and industrial customers), the Michigan Public Service Commission and the MoPSC also filed testimony challenging Panhandle's COS. The litigants primarily focused on Panhandle's requests regarding ROE, accumulated deferred income taxes, depreciation/negative salvage, operation and maintenance costs, and storage costs. Small customer transmission rates for a number of municipal customers in Missouri are also affected by Panhandle's rate case.

The Panhandle rate case hearing began on August 25, 2020 and continued for several weeks. The FERC administrative law judge (ALJ) hearing the case issued an initial decision on March 26, 2021. The decision recommended an ROE of 11.43%, a reduced COS, and lower rates for depreciation and net salvage. In addition, the initial decision specifically relied on MoPSC testimony in its recommendation to uphold FERC precedent preventing affiliate abuse and reduce Panhandle's annual recovery of costs for its affiliate Southwest by approximately $6.7 million.

Following the decision, the MoPSC and other parties filed Briefs on Exceptions and Briefs Opposing Exceptions. A final review and a decision from FERC based on the initial decision and these briefs is still pending.

Southern Star Central Gas Pipeline (Southern Star)

(FERC Docket No. RP21-778)

Southern Star filed its rate case with FERC on April 30, 2021. Southern Star's application sought an increase in its COS of $169.8 million, an increase of $454.3 million in rate base, an overall rate of return of 11.46%, an ROE of 14.6%, and a continuation of their modernization program. This would be a 69% increase to Southern Star's COS when compared to the COS approved in its last rate case in 2013 **(RP13-941).**

The proposed modernization program entails costs of at least $88 million annually, plus a 10% annual tolerance, with total program costs of up to $528 million over the next six years. Costs are to be collected from November 1, 2021 through December 31, 2027, using a Cost Recovery Mechanism or "CRM" Surcharge effective March 1, 2023 to February 28, 2029. The MoPSC filed a protest on May 12, 2021, focused on the ROE, capital structure, depreciation and negative salvage rates, the modernization program and expenses for operation and maintenance. Thirty-five other parties intervened, with six protesting.

The MoPSC participated in one prehearing, one settlement, one technical conference and issued discovery requests to Southern Star. The parties agreed to a joint proposed procedural schedule presented at a prehearing conference on June 30, 2021. The rate case hearing is scheduled to begin on April 25, 2022, with an initial decision scheduled to be filed on or before September 19, 2022.

Other FERC Cases:

The MoPSC continues to intervene and participate in cases involving natural gas that is lost and unaccounted for by pipeline companies. Pipelines make annual or semi-annual filings updating FERC on the percentage of natural gas the pipelines retain for use on their system, or for natural gas that is lost and unaccounted for during a pipeline's normal operations.

The MoPSC protests these filings to ensure pipelines do not improperly include natural gas lost due to incidents such as storm damage or valve failures in their lost and unaccounted for percentage calculations. In these types of incidents, the natural gas losses are known, measurable and non-reoccurring, so the lost gas is not unaccounted for. The MoPSC has been successful in protesting these cases, as FERC has agreed that these incident-related losses should not be included in the "lost and unaccounted for" calculation. As a result, more pipelines exclude these incident-related losses in their initial lost and unaccounted for percentage calculation filing.

In February 2021, Winter Storm Uri hit the Midwest and caused major electric outages and natural gas shortages due to frozen natural gas wellheads and other system malfunctions. The majority of the natural gas pipelines in the Midwest, especially those originating in Texas, experienced natural gas supply or system pressure issues causing them to issue Operational Flow Orders (OFOs).

OFOs restrict customers' use of natural gas on the pipeline system to their transportation contract terms. These restrictions prevent strain or failure of a natural gas pipeline system. The majority of natural gas pipeline customers are LDCs, municipal governments, industries and natural gas marketers. During an OFO, natural gas pipelines may be forced to curtail natural gas deliveries and, in some cases, purchase natural gas for their system in order to maintain pipeline system integrity. Penalties are assessed to those customers that do not stay within their contract terms or the parameters mandated by the OFO.

During Winter Storm Uri, many natural gas pipelines were forced to purchase system natural gas at exorbitant prices, which the pipelines passed on to customers in the form of OFO penalties, causing financial harm to those customers that could not adhere to the OFO order. Due to the unprecedented nature of this event, seven of the natural gas pipelines serving the Midwest chose to file requests with FERC seeking waiver of their OFO tariff provisions. The filed waiver requests eliminated some or all of the OFO penalties, and allowed delays for invoices or extensions of time to pay the amounts owed.

Missouri LDCs receiving service from natural gas pipelines responsible for paying the penalties may ultimately collect those charges from end-use customers. Missouri natural gas LDCs include Ameren Missouri, Empire District Gas and Spire Missouri. The MoPSC continues to monitor these and other effects from this major winter event.

FEDERAL ELECTRIC ACTIVITIES

The MoPSC actively participates in FERC cases filed by transmission-owning members, or cases filed on their behalf by the Midcontinent Independent System Operator (MISO) or the Southwest Power Pool (SPP). Missouri's electric investor-owned utilities are members of these two regional transmission organizations (RTOs).

MISO Transmission Customers v. MISO Transmission Owners

(FERC Docket Nos. EL14-12 and EL15-45)
Several organizations of large industrial electric energy consumers in Illinois, Indiana, Michigan, Minnesota and Wisconsin filed an overearnings complaint case against MISO transmission owners in November 2013 before FERC **(EL14-12)**. The complainants alleged that the 12.38% base ROE being collected by MISO transmission owners through transmission formula rates was unjust and unreasonable. MISO transmission owners earn a rate of return on rate base that is included in the revenue requirement setting the transmission formula rate.

The MoPSC intervened in this case and contributed to the comments filed by the Organization of MISO States (OMS) and the parties' litigation strategy leading up to the August 2015 hearing. The initial decision issued on December 22, 2015, recommended a reduced ROE to 10.32% and ordered refunds to transmission customers for the difference collected plus interest. FERC issued a decision in this case on September 28, 2016 supporting the initial decision. The refund period covered revenues collected from November 12, 2013 through February 11, 2015. Refunds were issued to MISO members in February 2017, including Ameren Missouri.

On February 12, 2015, MISO transmission customers filed a second complaint case **(EL15-45)** seeking refunds, beginning February 12, 2015 through May 11, 2016, because FERC electric complaint cases only provide for refunds covering a fifteen-month period. The arguments expanded those filed in **EL14-12** and extended the discounted cash flow (DCF) analysis period used in determining the base ROE.

The MoPSC along with the parties named above sponsored rebuttal testimony challenging the current 12.38% base ROE received by shareholder-owned MISO members with transmission formula rates. The recommended initial decision, issued on June 30, 2016, recommended a reduction of the base ROE to 9.7%.

In November 2018, FERC requested participants to the **EL14-12** and **EL15-45** proceedings submit briefs regarding its proposed changes to the method used to analyze the ROE component of rates for public utilities under FERC's jurisdiction. FERC's reconsideration of its ROE methodology stems from the 2017 U.S. District of Columbia Circuit Court of Appeals decision to vacate and remand FERC's **Opinion No. 531** ***(Emera Maine v. FERC)***. The MoPSC, along with the Mississippi Public Service Commission, the Missouri Joint Municipal Electric Utility Commission and other aligned parties, filed initial briefs in February 2019 and reply briefs in April 2019.

FERC issued **Opinion No. 569** on November 21, 2019, revising its ROE method. FERC authorized the use of both the DCF model and the capital-asset pricing (CAPM) model, revising the previous method that relied on the DCF model alone. FERC also established a range of presumptively just and reasonable ROEs based on the quantiles of the zone of reasonableness.

FERC applied its revised ROE methodology to both the **EL14-12** and **EL15-45** complaint cases, but denied refunds in the **EL15-45** case. In its November 21, 2019 **Opinion No. 569**, FERC dismissed the **EL15-45** case and found that no refunds should be issued. Many issues in the case(s) remain subject to motions for rehearing and/or appeal to the United States Court of Appeals, District of Columbia Circuit (D.C. Circuit). Both cases were decided together but with different outcomes, at the FERC level by **Opinions 569** and **569-A and -B**; both are now still on appeal together at the D.C. Circuit, with briefing essentially complete and oral argument expected at a time to be scheduled in the coming months. The MoPSC continues to participate in these cases and does not expect a final resolution until 2022.

FERC Notice of Inquiry in Relation to the Demand Response Opt Out:

In **Docket No. RM21-14**, FERC issued an NOI on March 18, 2021, seeking comments on whether FERC should revise its regulations that require an RTO or Independent System Operator (ISO) not to accept bids from an aggregator of retail customers (ARC) if the relevant electric retail regulatory authority (RERRA) prohibits such bids. The MoPSC is the RERRA for Missouri.

This FERC regulation is known as the Demand Response Opt Out. Missouri and several other states rely on the Opt Out to prohibit ARCs from bidding the demand response capabilities of Missouri retail customers directly into the wholesale electricity markets. Missouri put its Opt Out prohibition in place in 2010 as Missouri utilities instituted their own demand response programs.

The MoPSC filed comments to FERC in June 2021, outlining the MoPSC's general opposition to removing the Opt Out provision. The MoPSC requested that, if FERC repeals its Demand Response Opt Out provision, the agency allow a transition period so the states that have relied on the Opt Out may evaluate how repeal of the Opt Out may affect utility-run demand response programs and plan for the integration of retail demand response resources into wholesale markets.

Regional Electric Transmission Activity

The MoPSC regularly participates in the stakeholder processes of the two Regional Transmission Organizations (RTOs) whose regions include Missouri: the Midcontinent Independent System Operator (MISO); and, the Southwest Power Pool (SPP).

RTOs are organizations authorized under Title 16 USC §824 and by FERC to operate the interstate Bulk Electric Transmission Grid (the Grid), plan upgrades to, and expansions of the Grid, manage wholesale bulk electric markets through which utilities buy and sell electricity, conserve electric power and ensure reliable supplies of electric power are available. The MoPSC participates in RTO activities to ensure Missouri electric ratepayers and customers receive reliable and safe services at reasonable rates due to these federal activities both in the present and in the future.

MoPSC Staff in the General Counsel Division of the Regulatory Analysis Department, Bulk Regional Transmission Unit (BRTU) of the MoPSC, provide updates and briefings on RTO and FERC activities to the Commissioners, and spearhead the MoPSC's monitoring and interaction of RTOs to promote Missouri's interests.

Southwest Power Pool (SPP)

There are three Missouri jurisdictional electric utilities that are members of SPP: Evergy Missouri Metro, Evergy Missouri West and Empire.

City Utilities of Springfield, Independence Power and Light, many smaller Missouri municipal utilities and cooperatives, and the Missouri Joint Municipal Electric Utility Commission (MJMEUC) are also members of, or participate in SPP and its bulk wholesale energy markets.

The SPP serves transmission owning utilities, transmission dependent utilities, cooperatives and municipalities across 14 states in which it manages over 94,600 megawatts of nameplate generating capacity and 70,000 miles of high-voltage transmission lines and facilities, conducts ongoing transmission expansion and upgrades planning, operates day-ahead and real-time wholesale energy markets, coordinates local electric utilities and cooperatives activities, conducts inter-RTO operations and manages federal utility compliance services with FERC for its members.

SPP Regional State Committee (RSC)

MoPSC Commissioner Scott Rupp continued to represent the Commission to the SPP Regional State Committee (RSC) in FY 2021. Commissioner Rupp provides Missouri perspectives and input to the RSC as it develops collective state-regulatory commission guidance to the SPP Board of Directors. The SPP delegated to the RSC, authority to set resource adequacy requirements and transmission cost recovery policies oversight, and authorizes the RSC to compel SPP to submit filings before the FERC when it deems it necessary. The MoPSC BRTU assists the MoPSC in its oversight of, and participation in, SPP stakeholder working groups and transmission planning activities.

SPP Holistic Integrated Tariff Team (HITT)

In March 2018, the SPP Board approved the creation of the Holistic Integrated Tariff Team (HITT). HITT was established to reexamine a number of SPP's practices: transmission project cost allocation protocols; transmission planning; generator interconnection practices; and the impacts of variable generation resources including wind powered generation. Cost allocation of transmission projects received special attention from MoPSC BRTU Staff, as authority of that issue resides within the RSC. A MoPSC BRTU Staff representative served on HITT.

In FY 2021, MoPSC BRTU Staff serving on the SPP Cost Allocation Review Working Group (CAWG) participated in the development of white papers formulating cost allocation policies for:

- Electric storage devices used as transmission facilities;
- Reallocation of transmission service costs for wind energy flowing on subregional transmission facilities that should be paid by the entire SPP region; and
- Generator interconnection costs for network and point-to-point interconnection services.

SPP's Strategic and Creative Re-Engineering of Integrated Planning Team (SCRIPT)

In September 2020, SPP began a new initiative to, "strategically [develop] broad changes to SPP's transmission planning processes to better meet customer needs while resolving growing stakeholder concerns about the amount, nature and funding of continued transmission investment amid rapid industry changes.[1]" This process involved much work and monitoring by the RSC and MoPSC BRTU Staff, as many of the SCRIPT issues were under the RSC's purview and/or of critical interest to Missouri.

These SCRIPT issues included:

- Cost-sharing, which is critical as it determines who pays for transmission projects;
- Exports and interregional planning, critical as Missouri sits on the SPP-MISO and SPP-AECI seams[2];
- Decision quality and optimization, critical as they determine which transmission projects are approved for construction.

SCRIPT is a process currently scheduled to conclude in October 2021 with a final report of recommendations. Similar to the HITT process from last year, it is presumed that the step after the SPP Board's acceptance of the SCRIPT report will involve implementing the recommendations through business practice and tariff changes.

1 SPP SCRIPT Scope document, found at https://www.spp.org/documents/63139/20201002%20script%20minutes%20&%20materials.pdf
2 A "seam" is a boundary between an RTO and another RTO or non-RTO utility or cooperative. Electricity transmitted across a seam requires coordination between all entities on the seam that operate transmission facilities.

SPP RSC's Cost Allocation Review Working Group (CAWG)

The CAWG is a state-staff level working group that reviews, monitors and performs analysis of any and all SPP proposals and practices, and reports and makes recommendations to the RSC and its president. The CAWG also monitors and participates in other SPP stakeholder working groups to ensure adequate state oversight. The CAWG chair coordinates its activities with the SPP staff and the RSC sets the CAWG agenda.

Other RSC duties include oversight of resource adequacy in the SPP region. To fulfill that duty, MoPSC BRTU Staff working with the CAWG also monitor SPP's Supply Adequacy Working Group (SAWG) as it reviews technical policy and operational details to ensure SPP region-wide resource adequacy.

In FY 2021, the SAWG studied and recommended the SPP Board adopt the Effective Load Carrying Capability protocol to determine the resource adequacy of wind, solar and electric storage devices for SPP capacity planning. These plans ensure SPP's load serving members have the ability to generate required amounts of electricity at any time. The SAWG annually reviews load serving entity resource adequacy plans whereby load forecasts and generation are compared to ensure adequate capacity and reserves exist to serve electric demand. This generation will then be offered into the SPP energy markets to determine hourly wholesale energy prices for each hour of the year.

Missouri BRTU Staff also represents the CAWG on SPP's Network Resource Interconnection Service/Energy Resource Interconnection Service and Deliverability Taskforce as that working group seeks to develop protocols and recommendations to modify SPP's generation interconnection process to shorten the amount of time the generator interconnection process requires and to enhance the value of network transmission.

Missouri BRTU Staff also represents the CAWG on SPP's Seams Advisory Group. A seam is the boundary where different RTO regions meet. That group works on seams issues, which are crucial to Missouri as Missouri contains a significant portion of the SPP–MISO seams boundary.

CAWG members also participate on other SPP stakeholder working groups that review transmission planning processes, transmission project construction engineering and costs reviews, and electric energy markets rules reviews.

SPP Order 2222 Task Force

FERC issued **Orders 2222, 2222-A** and **2222-B** (in **Docket No. RM18-9**) in September 2020, March 2021 and June 2021, respectively, mandating RTOs open any and all of their wholesale markets to Distributed Energy Resource Aggregations (DERAs) of retail electric utility customers.

RTOs are to treat DERAs on an equal basis as traditional generators of electricity and load serving entities. SPP established a taskforce to inquire of state regulators, electric cooperatives, municipal utilities and investor-owned utilities what their DER regulations, policies and practices are and to develop and draft SPP policies, business practices and tariff language to comply with **Order 2222**.

MoPSC Commissioner Scott Rupp was appointed by the SPP Regional State Committee (RSC) to represent collective SPP states' interests to the taskforce and to inform and guide from a state regulatory perspective the formation of SPP's DER policies and tariff in this regard. SPP plans to submit its **Order 2222** compliance filing to FERC for its approval in October, 2021 with a proposed effective date of April 2022.

February 2021 Polar Vortex and Response

The continental United States was enveloped by a mass of polar air from February 4 to February 20, 2021 bringing extremely low temperatures to the entire SPP and MISO footprints. These temperatures incapacitated fuel supplies, both gas and coal, and iced wind turbine blades across the SPP region and ultimately resulted in a 57 minute series of rolling customer interruptions on February 15 and an almost 4 hour long rolling customer interruption on February 16, 2021, including those Missouri SPP-member utilities and municipal utilities[3]. SPP imported energy from other entities and RTOs across the country in an attempt to minimize and mitigate the periods of rolling blackouts, some of which affected areas in Missouri.

SPP began analyzing its performance during the 2021 Polar Vortex before the Vortex ended and MoPSC BRTU staff participated in the SPP SAWG executive committee as it reviewed what happened, why and what policies would be needed to mitigate performance deficiencies. The results of the SAWG effort were combined into a report submitted by SPP stakeholders, members, SPP RSC and SPP staff to the SPP Board of Directors, which approved the report on July 27, 2021. The recommendations include policies to improve:

3 Evergy Missouri Metro, Evergy Missouri West, The Empire District Electric Co., City Utilities of Springfield, Missouri Joint Municipal Electric Utilities Commission.

- Fuel assurance;
- Resource Planning and Availability;
- Emergency Response Processes and Planning;
- [Grid] Operator Tools and Communications Processes;
- Seams Agreements;
- Market Design;
- Transmission Planning;
- Credit and Settlements [Policies and Practices]; and
- Communications [Capabilities and Practices].

Commissioner Rupp and MoPSC BRTU Staff participated in these analyses and policies determinations.

Midcontinent Independent Transmission System Operator (MISO)

MISO serves Ameren Missouri, Columbia Water and Light, the Missouri Joint Municipal Electric Utility Commission (MJMEUC) and several smaller municipalities and cooperatives generally on the eastern side of Missouri. MISO coordinates operations of electric utilities across 15 states, the City of New Orleans and the Canadian province of Manitoba. MISO manages almost 65,800 miles of transmission lines and conducts on-going transmission grid expansion planning, operates wholesale day-ahead and real-time energy markets, has dispatch control of over 198,900 MW of generating capacity, coordinates inter-RTO grid management and manages federal utility compliance services with FERC for its members.

Calendar Year 2021 Resource Adequacy

On April 15, 2021, MISO conducted its annual Planning Resource Auction (PRA). The PRA is the mechanism used by MISO to determine how much generating capacity it will need to meet its region-wide peak load for the coming planning year (June 1-May 31), how much capacity to hold in reserves for contingencies and what to pay generator owners per megawatt-day for capacity. This year MISO determined a planning reserve requirement of about 134 gigawatts will be required to meet load plus reserves. Missouri's forecasted requirements are slightly over 8,240 megawatts and will receive a capacity payment of $5.00/megawatt-day; Missouri's MISO generators will be able to meet this requirement and have additional capacity to sell in the capacity market.

Organization of MISO States Leadership and Participation

MoPSC Chairman Ryan Silvey currently serves on the Organization of MISO States (OMS) Board of Directors as OMS' Secretary and is the MISO Seams commissioner-liaison. As a member of the OMS Board, Chairman Silvey coordinates with other states through the OMS (which is independent of MISO) as it monitors MISO and federal activities and regional activities that affect Missouri and provides input to policy direction and formation, works with MISO management to ensure states' interests are adequately reflected and represented in MISO's markets and planning policies. Chairman Silvey also acts as co-chair of the SPP-RSC/OMS Seams Liaison Committee which is seeking to coordinate and improve seams matters between MISO and SPP.

Cost Allocation Planning Committee (CAPCom)

The OMS Cost Allocation Principles Committee began meeting in October 2020. The committee was comprised of commissioners serving on the OMS Board. The goal of the committee was to generate a set of principles for how to allocate costs of projects coming out of MISO's Long Range Transmission Planning (LRTP) Process.

The committee ultimately established and approved basic principles in April 2021. These principles have been successfully incorporated into MISO's stakeholder discussions determining the proper cost allocation for LRTP projects. These discussions were ongoing as of the end of the fiscal year.

MISO Long Range Transmission Plan

After an October 2019 MISO-OMS workshop presentation on the topic, MISO began a significant LRTP effort in March 2020. During this fiscal year, MISO developed a variety of planning future scenarios and developed possible transmission project solutions for those scenarios.

In addition, MISO led stakeholder discussions on the proper cost allocation for any projects that may come out of this LRTP process. MISO has led discussions around the possibility of utilizing a different cost allocation for transmission projects approved at the end of the 2021 calendar year versus transmission projects approved in future years.

OMS Comments to FERC

MoPSC BRTU Staff worked with the 17 other state members of OMS on the many and varied comments to FERC filed by OMS in official FERC case files, and BRTU Staff's work in this area included editing and participating in input sessions for these comments in many varied subjects such as (but not limited to): Distributed Energy Resources, ROE incentive adders and their implications for present and future RTO membership across the country, Ambient Adjusted Line Ratings and Dynamic Line Ratings, the FERC Notice of Inquiry on the future of **Order 2222** and state opt-out provisions, and Cyber-security Incentives, among others.

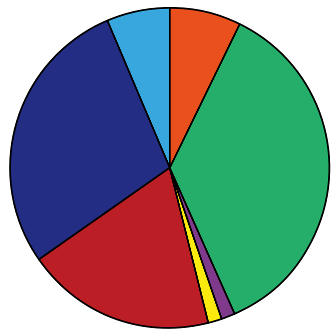
OMS-SPP RSC Seams Liaison Committee

In fall 2020, Chairman Silvey was named the MISO Lead of the Seams Liaison committee. MoPSC BRTU Staff continued, as in the past few years, to heavily support the activities and goals of the Seams Liaison Committee.

The Seams Liaison Committee performed the following actions in FY2021:

- Published its report of recommendations, with emphasis on the areas on interregional planning (including recommendations on Targeted Market Efficiency Project (TMEP)-style projects)and rate pancaking;
- Established a Rate Pancaking Working sub-group, which had its first meeting in June 2021, and is expected to meet throughout FY2022;
- Received updates on MISO and SPP staff work on TMEP-style projects and enumerated the possible design thereof.

TELECOMMUNICATIONS, IVOIP, AND VIDEO SERVICE PROVIDERS



Video Service	51
I-VoIP	255
Shared Tenant Services (STS)	8
Private Payphone	11
Incumbent Local Exchange (ILEC)	43
Competitive Local Exchange (CLEC)	135
Interexchange (IXC)	199

TELECOMMUNICATIONS

Commission Authority/Responsibilities

The Commission's jurisdiction over telecommunications is primarily limited to wholesale matters, telephone numbering and administering telecommunications-related programs and funds. Companies providing various forms of landline telecommunications services and Interconnected Voice over Internet Protocol (IVoIP) service must be certificated or registered with the Commission. Companies offering video service have the option to seek authorization through the Commission rather than through a local municipality.

During the past year, the overall number of authorized providers increased from 649 to 702. In general, IVoIP providers, ILECs, CLECs and IXCs are subject to various reporting and assessment requirements.

Universal Service Fund Programs

The Federal Communications Commission (FCC) administers the federal Universal Service Fund (USF). This federal fund is used for a variety of different programs; however, the FCC relies on state commissions to specifically help in the administration of the high-cost program and the Lifeline program. A landline or wireless company operating in Missouri wanting to receive financial support from the federal high-cost program or the Lifeline program must first obtain status from the Commission as an eligible telecommunications carrier (ETC). ETC status ensures a company meets certain qualifications and makes certain commitments for complying with various program requirements. Minimum ETC requirements are identified in FCC rules; however, a state commission may expand upon those requirements. This past year, 12 companies applied for ETC status ultimately raising the number of Missouri companies with ETC status to 86 companies.

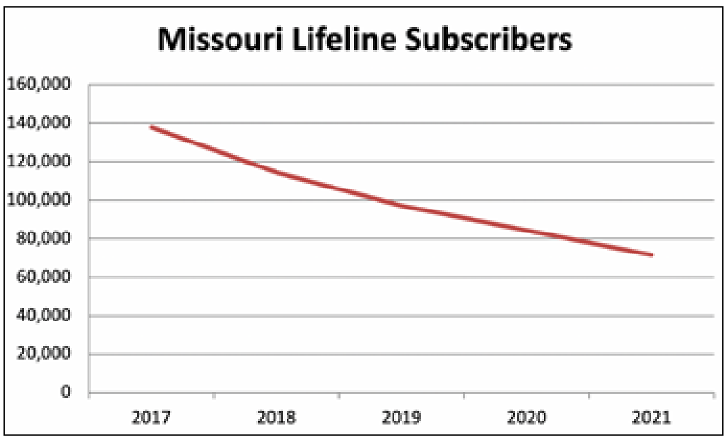
High-Cost Support Program: The high-cost program is solely funded through the federal universal service fund and is intended to ensure voice and broadband services are available to consumers throughout the nation at comparable rates. Essentially the high-cost support program provides financial support to companies serving high-cost areas in rural and sparsely-populated areas. In Missouri, 58 companies received approximately $212 million in federal high-cost support in 2020.

A significant portion of this funding is for broadband expansion. For example, nearly $181 million of the $212 million in high-cost support provided in 2020 is to expand broadband service availability.

A total of 52 companies are receiving this funding to expand broadband service to 325,403 Missouri households within targeted areas. As of the end of 2020, these companies have expanded broadband service to 221,471 of the 325,403 locations.

The FCC solely determines where this funding is used for broadband expansion by identifying unserved or underserved census block areas meeting certain criteria. Funding obligations to deploy broadband meeting designated minimum speeds and deadlines can vary between companies. This past year, the FCC announced the winning bidders to expand broadband service to an additional 199,211 Missouri rural locations. This additional funding will provide $346 million in total over ten years but require broadband obligations to be met within six years.

The FCC relies on state commissions to annually certify companies receiving high-cost support payments. This certification process is intended to ensure a carrier's high-cost support was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrade of facilities and services for which the support is intended. Failure to obtain this state certification results in termination of a company's high-cost support. The Commission has established rules identifying requirements for obtaining annual certification. This past year, a total of 58 companies received such certification from the MoPSC.



Lifeline Program: The Lifeline program is designed to provide discounted phone service to qualifying low-income consumers. Landline and wireless companies participate in the Lifeline program, which has been in existence since 1985 and is overseen by the FCC in partnership with the states. Funding for the Lifeline program comes from the federal universal service fund and the Missouri universal service fund.

Federal funding for the Lifeline program is slowly changing whereby federal funding will only support broadband service and not voice service in most areas. Federal Lifeline funding for voice service was reduced from $9.25 to $7.25 on December 1, 2019 and from $7.25 to $5.25 on December 1, 2020.

Missouri USF support has increased to offset these federal funding declines for Lifeline voice service in order to maintain a $24 total discount for any landline Lifeline subscriber. Missouri USF support is currently $18.75 for Lifeline voice-only service and $14.75 for Lifeline voice service combined with a qualifying broadband service. The FCC plans to eliminate the $5.25 federal Lifeline support for voice-only service on December 1, 2021. The Missouri Commission has directed its Staff to file updated Missouri USF financial data along with recommendations regarding the assessment and support amounts by November 30, 2021. Per Missouri law, Missouri USF support is not offered for broadband-only service and is not available to wireless providers.

Consumers participating in the following programs are eligible for the Lifeline program: Missouri HealthNet, Supplemental Nutrition Assistance Program (SNAP), supplemental security income, federal public housing and Veterans and Survivors Pension Benefit program. Consumers with a household annual income at or below 135% of the federal poverty level are eligible for the Lifeline program. In June 2018, the universal service administrator, USAC, began launching, on a state-by-state basis, the National Verifier, which requires USAC to review each enrollment and independently verify an applicant's eligibility. Missouri's launch began March 5, 2019.

As of June 2021, there were approximately 5.7 million Lifeline subscribers nationwide. Missouri has 71,556 Lifeline subscribers, which is a decrease from the prior year of 84,376 Lifeline subscribers. Of these subscribers, approximately 3,500 receive Missouri USF support.

Disabled Program: The disabled program is similar to the Lifeline program in that it provides discounted phone service to consumers participating in the following programs: veterans' administration disability benefits, state blind pension, state aid to blind persons, state supplemental disability assistance payments, or federal social security disability program. In contrast to the Lifeline program, the disabled program is solely funded through the Missouri USF. The disabled program is limited to landline providers and offers a $24.00 a month discount to a qualifying customer with voice service or a bundled voice and broadband service. The disabled program does not support broadband-only service. Approximately 310 subscribers were participating in the program in June 2021 versus 300 subscribers a year earlier.

Emergency Broadband Benefit Program (EBB Program): The Emergency Broadband Benefit Program is a temporary federal program providing a temporary discount for broadband service to qualifying low-income households struggling to afford internet service during the COVID-19 pandemic. The program launched on May 12, 2021, offers up to a $50 monthly discount on broadband services and associated equipment rentals and a one-time discount of up to $100 for a laptop, tablet, or desktop computer.

A consumer qualifies for the program if they are eligible for the Lifeline program, experienced a substantial loss of income since February 29, 2020 due to job loss or furlough AND has a total household income in 2020 at or below $99,000 for single filers and $198,000 for joint filers, received a federal Pell Grant in the current award year, received approval for benefits under the free and reduced-price school lunch program or the school breakfast program, including through the USDA Community Eligibility Provision, in the 2019-2020 or 2020-2021 school year, or meets the eligibility criteria for a participating provider's existing low-income or COVID-19 program, and that provider received FCC approval for its eligibility verification process.

If a consumer currently receives Lifeline benefits, they automatically qualify for the EBB program and can receive both benefits at the same time. The EBB Program will end when the fund is expended or six months after the end of the public health emergency.

Funds Administered by the Commission

Missouri Universal Service Fund: The Missouri Universal Service Board, consisting of the MoPSC and OPC, oversees the Missouri USF pursuant to Section 392.248, RSMo. Commissioner Maida Coleman currently serves as Chair of the Universal Service Board. The Missouri USF currently provides funding to landline carriers for the provisioning of discounted voice service to qualifying Lifeline and disabled customers. The Missouri USF is funded through a percentage-based assessment on retail net jurisdictional revenues of landline telecommunications companies and interconnected VoIP providers. This assessment is ultimately paid for by consumers and shows up as the Missouri USF surcharge on monthly bills. Fund administration is handled by a third party selected through a competitive bid process.

The Missouri USF fund balance has decreased from $2,645,612 to $1,782,070 during the June 2020 through June 2021 time period. In **Case No. TO-2019-0346,** the MoPSC suspended the Missouri USF assessment effective January 1, 2020 through December 31, 2021. As previously mentioned, the Missouri USF support amount also increased from $6.50 to $14.75 for a bundled voice/broadband Lifeline service and to $18.75 for voice-only Lifeline service. Missouri USF support remains $24.00 for Disabled program subscribers.

Relay Missouri Fund: The MoPSC oversees the Relay Missouri Fund (a.k.a. Deaf Relay Service and Equipment Distribution Program Fund) pursuant to Section 209.258, RSMo. This fund provides financial support to ensure deaf, hearing-impaired and speech-impaired consumers have reasonable access to telephone service. More specifically, the Relay Missouri Fund provides financial support for Relay Missouri service, Captioned Telephone service (CapTel) and the Telephone Access Program. Missouri Assistive Technology administers the Telephone Access Program while the Commission oversees the provisioning of relay and CapTel services in Missouri. The MoPSC contracts with a party to provide relay and CapTel services.

The Relay Missouri Fund balance has declined from $2,071,879 to $1,504,884 during the July 1, 2020 to June 2021 time period. The Relay Missouri Fund is funded by a $.04 per line monthly surcharge applied to each landline providing basic local telecommunications service or interconnected VoIP service.

Pricing Reforms

Effective August 28, 2014, all retail telecommunications rates were de-regulated. Terms, conditions and rates associated with telecommunications services can either be maintained in a tariff filed with the MoPSC or by maintaining rates on a company's website. Currently approximately 80 companies maintain their rates on their website.

Telephone Numbering

The MoPSC serves as an impartial telephone numbering administrator in Missouri, working closely with the National Number Pool Administration to implement industry guidelines to include telephone number reclamation procedures, and the issuance of new telephone numbers in quantities sufficient to serve new telephone numbering needs.

The MoPSC also serves in a capacity to review, and potentially reverse, decisions by federal authorities which have denied additional telephone numbers to telephone companies when specific utilization guidelines are not met. Often referred to as "safety valve" requests, such

AREA CODE	PROJECTED DATE OF TELEPHONE NUMBER EXHAUSTION*	PERCENTAGE OF NUMBERS ASSIGNED TO CARRIERS
314	2nd quarter of 2023	61%
417	4th quarter of 2027	38%
573	1st quarter of 2025	33%
636	*Exhaust date exceeds 30 years*	41%
660	*Exhaust date exceeds 30 years*	31%
816	3rd quarter of 2024	50%

**Forecast as approved by the FCC in April 2021. The exhaust dates are reviewed twice a year by numbering authorities.*

authority permits the MoPSC to examine and verify telephone numbering needs involving individualized company-specific situations. In the 2021 fiscal year, the MoPSC did not receive any safety valve requests.

988 Three-Digit Abbreviated Dialing Code: On July 16, 2020, the FCC adopted an order approving the designation of "988" as a three-digit abbreviated dialing code for the national suicide prevention and mental health crisis hotline.

The "988" three-digit abbreviated dialing code is scheduled to go into effect July 16, 2022. In order for the dialing code to work, ten-digit local dialing is required for any area code with a "988" NPA prefix.

Nationwide there are approximately 83 area codes that will need to transition to ten-digit local dialing, which includes the four area codes of 314, 417, 660 and 816 within Missouri.

The North American Numbering Plan Administrator (NANPA) has established a plan to transition the 83 area codes to ten-digit local dialing. The Missouri Commission opened up an investigatory docket to communicate with Missouri's telecommunications providers regarding their plans for implementing ten-digit local dialing.

314 and 816 Area Code Relief: On June 30, 2021 NANPA notified Staff of the need for relief in the 314 and 816 area codes. NANPA projects that the 314 area code will exhaust in the second quarter of 2023 and the 816 area code will exhaust in the third quarter of 2024.

Since both areas will have ten-digit local dialing by the time telephone number relief is needed telephone numbers with a new area code will likely be assigned so that the same geographic area will simply have telephone numbers from two different area codes.

Specifically, this arrangement is expected to result in the current 314 area assigning telephone numbers with 314 and 557 area codes while the current 816 area will assign telephone numbers containing the 816 and 975 area codes.

Other Wholesale Matters

State and federal laws provide the MoPSC with authority over wholesale telecommunications issues. Interconnection agreements are documents identifying the charges and how telecommunications providers interconnect with incumbent local telephone companies. During the past year a total of 14 new interconnection agreements were filed with the MoPSC and 30 interconnection agreements were revised. Two complaints were formally filed with the MoPSC in 2020 alleging violations of the terms contained within the applicable interconnection agreements. One complaint has since been settled by the parties and dismissed by the MoPSC. The other complaint is still in the process of negotiation.

WATER AND SEWER DEPARTMENT

The main functions of the Water and Sewer Department (W/S Department) are to conduct inspections of utility operations, assist customers, investigate customer complaints, work on tariff filings, review small and large company rate requests, and review applications for certificates of convenience and necessity to ensure that water and sewer utilities are providing safe and adequate service to their customers.

Another major role fulfilled by the W/S Department is investigating customer complaints regarding quality of service issues. W/S Department personnel spend many hours in the field investigating complaints and working with the customer and the company to find solutions to the customer's concerns.

There are approximately 34 regulated water and/or sewer companies in the State of Missouri. Most of these companies are considered small or very small based upon those definitions as provided by the National Regulatory Research Institute (NRRI). Typically, these systems have less than 500 customers. One of the major challenges is providing the utility with reasonable revenue to make needed repairs and comply with Missouri Department of Natural Resources (DNR) mandated upgrades, while at the same time keeping rates reasonable for consumers.

In fulfilling its duties, the W/S Department also works very closely with DNR whose responsibilities include ensuring that the utilities are complying with the applicable federal and state environmental and water quality laws and regulations.

Small Rate Cases

During fiscal year 2021, there were three small utility rate cases decided by the Commission. A small water or sewer utility is a utility that serves fewer than 8,000 customers.

On August 26, 2020, the Commission approved an agreement authorizing the Raytown Water Company to increase annual water operating revenues by approximately $482,575 **(Case No. WR-2020-0264).**

On December 30, 2020, the Commission approved an agreement which authorized Elm Hills Utility Operating Company, Inc. to increase annual water operating revenues by approximately $64,361 and annual sewer operating revenues by approximately $326,474 **(Case Nos. SR-2020-0274 and WR-2020-0275).**

A third rate case filed by Carl Richard Mills (Mills) **(Case No. WR-2021-0177)** was decided during the fiscal year. Mills was required by the Commission to file a rate case to examine costs and rates as a condition of approval of their initial Certificate of Convenience and Necessity in 2018. Mills had determined that a rate change was not necessary, and did not seek a rate increase. After negotiations between Staff, OPC, and Mills, a small rate decrease was approved by the Commission on June 9, 2021.

Large Rate Case

On June 30, 2020, the Missouri-American Water Company (MAWC) filed water and sewer rate increase requests with the Commission **(Case No. WR-2020-0344)** seeking an increase of approximately $103 million over water and sewer revenues authorized in MAWC's last general rate cases decided in May 2018.

Under an agreement approved by the Commission on April 7, 2021, MAWC was granted an increase of approximately $30 million over annual water and sewer revenues authorized in MAWC's last general rate cases. As part of the agreement, MAWC will maintain its existing tariff groups and districts.

MAWC is the largest Missouri water and sewer utility regulated by the Commission.

Receivership Actions

When the Commission determines that an owner is unwilling and/or unable to provide safe and adequate service, the Commission can place the utility under control of a receiver. It is the receiver's general duty to operate the system in a manner that provides safe and adequate service and to prepare the utility for ultimate sale to a provider that will take over the operations. Receivers are not owners and do not have the ability or resources to make investments that are usually necessary to solve all issues at these troubled utilities.

In fiscal year 2021, no receivership actions were taken by the Commission.

Needed Investment

Many of Missouri's small systems are older systems with much needed investment requirements, but the operators do not always have the financial means to

make improvements to the systems. The W/S Department is constantly engaged with the small systems that are regulated by the Commission, and other interested entities, to look for creative solutions so that the utilities can make the appropriate upgrades and continue to provide safe and adequate service at just and reasonable rates.

Even with this engagement, some small systems still have trouble making the appropriate investment. A trend that has been occurring over the past several years is larger, financially stable utilities acquire smaller systems that are unable to continue to make the needed investment into their systems. These smaller systems are sometimes already regulated by the Commission. Others are municipalities or other non-regulated systems. Regardless, acquisition by larger utilities allows for the continuation of safe and adequate service. This is a trend that will continue in the foreseeable future.

In fiscal year 2021, there were nine mergers and acquisitions filed with the Commission for approval, of which three were approved and six are still pending.

CUSTOMER EXPERIENCE DEPARTMENT

The Customer Experience Department (CXD) provides testimony and recommendations on customer experience matters before the Commission. Defining customer experience varies by industry and organization but the one invariable definition is that customer experience focuses on customers' overall journey or experience with a company. An effective customer experience business strategy takes a holistic assessment of customer contact at every level of an organization.

CXD Staff consists of Research/Data Analysts and Senior Research/Data Analysts. CXD Staff participated in a diverse range of cases and projects during the 2021 fiscal year including small utility rate cases, formal complaints, general rate cases, certificate applications, investigatory dockets, tariffs, rulemakings and working groups.

CXD Staff monitors and responds to certain public comments, provides testimony and analysis on customer service issues, participates in energy advisory groups and attends local public hearings. CXD Staff participates in the Telecommunications Department's annual review of USF certifications for selected telecommunications companies.

CXD Staff performed service quality analysis during the 2021 fiscal year on a number of small water and sewer companies in the context of rate increase requests, acquisitions and certificate cases. Audits of small water and sewer companies provide CXD Staff an opportunity to recommend improvements and examine compliance in areas including customer billing, payment remittance, credit and collections, complaint handling, business office operations and record retention.

During the 2021 fiscal year, CXD Staff filed testimony or a Staff Report in formal complaints and in a variety of other cases, including, however not limited to, *In the Matter of a Staff Investigation into the Customer Service and Billing Recordkeeping Practices of Spire Missouri, Inc. d/b/a Spire* **(Case No. GO-2020-0182),** *In the Matter of a Working Case to Consider Best Practices for Recovery of Past-Due Utility Customer Payments After the Covid-19 Pandemic Emergency* **(Case No. AW-2020-0356),** *In the Matter of Spire Missouri Inc.'s d/b/a Spire Request for Authority to Implement a General Rate Increase for Natural Gas Service Provided in the Company's Missouri Service Areas* **(Case No. GR-2021-0108),** *In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of its Surge Protection Program* **(Case No. ET-2021-0082),** *and In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Investor Owned Utilities* **(Case No. AO-2021-0264).**

CXD Staff receives and reviews quality of service reports from various companies as a result of mergers, investigations and rate cases. These reports typically contain data on staffing levels, field operations, and call center indicators (such as average speed of answer, abandoned call rate, and the number of billing estimates performed). CXD Staff monitors various aspects of customer experience including the call center performance of the state's large regulated natural gas and electric companies as well as Missouri-American Water Company.

CXD Staff meets quarterly and periodically with large utility companies to discuss customer experience issues. Service quality is continuously reviewed with the companies to examine utility performance and customer service.

CONSUMER SERVICES DEPARTMENT

The Consumer Services Department (Consumer Services):

- Responds to information requests, consumer complaints and inquiries regarding utility service. Consumer Services also handles the submission of public comments regarding pending cases related to rate increases, certificate requests, formal complaints and working cases.
- Ensures utility compliance with Commission rules and regulations as well as with the utility's Commission-approved tariffs.
- Works to educate customers, utilities and the public on utility-related consumer service issues, rights and responsibilities, with a focus on promoting understanding to prevent disputes.

Consumer Services has full-time investigators who handle a variety of consumer issues including billing problems, payment arrangements, denial of service issues, disconnection and service connection issues, enforcement of rules and regulations and safety issues. Consumer Services is the link between consumers and the utility company that serves them. Consumer Services handles all contacts in a prompt, fair and practical manner.

All parties are encouraged by Consumer Services to focus on preventing problems before they occur. When consumer issues are found, investigators guide the parties to identify and correct the cause.

The Commission received over 6,400 customer-related contacts in fiscal year 2021. Contacts include complaints, inquiries regarding rules and regulations, information requests, non-jurisdictional requests and public comments related to pending utility cases.

MANUFACTURED HOUSING AND MODULAR UNITS PROGRAM

The Manufactured Housing and Modular Units Program (Program) of the Commission is responsible for overseeing the annual registration of dealers and manufacturers of manufactured homes and modular units, as well as the licensing of installers of new manufactured federal Housing and Urban Development (HUD) homes. Program Staff also prescribes and enforces uniform construction, safety and installation standards by conducting inspections, which include enforcement of tie down and anchoring requirements.

The Commission has a toll-free number, **1-800-819-3180**, for consumers who have questions or complaints regarding manufactured homes or modular units. Program Staff conducts **free** home inspections for consumers requesting an inspection if the consumer is the first owner of the home and the home is less than two years old. Additional information is available on the Commission website at **www.psc.mo.gov/manufacturedhousing.**

During the 2021 fiscal year, the Program licensed 147 manufacturers, 205 retail dealers, and 98 installers. Field Staff conducted a total of 12 consumer complaint inspections. Most of the installer training classes scheduled for the end of 2020 had to be canceled, but in 2021, Program Staff hosted three virtual installer trainings. With the implementation of virtual trainings, the number of licensed installers increased by around 150% from 2020 to 2021.

Program Staff regularly conducts home inspections. On-site inspections can help identify any installation problems and those problems can be repaired before the installation of the home is completed, reducing repair costs and ensuring that the consumer has a properly installed, longer lasting home. In many cases, these on-site inspections are initiated or requested by the home installer, dealer or the home owner to ensure the site is properly prepared before the home is placed on the site.

Oversight and Regulation

Structures that are not properly installed may result in very expensive repairs which can take weeks to complete.

Most of today's homes and commercial units are multi-section structures installed on crawl spaces or basement foundations or below frost grade footings. Many of these structures have high-pitched hinged roofs and require specialized equipment to install.

Many multi-section units require several weeks to fully complete from site preparation to final close up and interior finish. Program Staff work with local communities around the state to ensure manufactured homes and modular units are built to the applicable building and safety codes and are set up and installed according to applicable state and federal standards.

Manufactured Homes and Modular Unit Sales

Approximately 1,122 new manufactured homes and new modular units were sold in Missouri during the 2021 fiscal year. In addition, 912 used homes were sold in the state.

Modular and manufactured homes fill a major housing void in many rural areas where site built homes are difficult to construct in a timely manner. Manufactured homes also offer an affordable alternative to site built homes.

Commercial modular units range from small single section units to large 16 to 20 section multi-family structures. Other commercial units include specialized units such as medical facilities, banks and jails. Many of these commercial units can be delivered and fully operational within a very short period of time. Program Staff work with local building and code officials to ensure these structures meet the applicable commercial building code requirements under the International Building Codes (IBC).

Modular unit classrooms are a major component of affordable classrooms in many school districts throughout the state. Modular classrooms can provide schools the opportunity to add classrooms at a fraction of the cost of building traditional site built classrooms.

Recent Projects

The department has overseen multiple manufactured housing communities across the state that brought in a large number of homes this year. Program inspectors make it a priority to be at the communities before and while these homes are being installed to ensure code compliance, but also to work with Commission-licensed installers to deliver a quality installation that will serve the home buyers for many years to come.

Program Staff were involved with multiple complaints that went through our formal dispute resolution process. This process includes on-site hearings, which are conducted at the home's location with the homeowner, manufacturer, dealer, installer(s) and Program Staff. Corrective action is identified by Program Staff and the responsible party is required to make the applicable changes. These hearings have reduced legal cost for the industry, the consumer and the Commission.

STATISTICS FOR FISCAL YEAR 2021

Registered Manufacturers	147
Registered Dealers	205
Registered Installers	98
Homes Sold (New & Used)	2,034
Consumer Complaint Inspections	12
On-Site Inspections	436
Dealer Lot Inspections	21
Dealer Lot Investigations	3
Modular Unit Seals Issued	819
Modular Unit Plans Approved	301
Installer Decals Issued	1,541

RATE CASES DECIDED DURING THE 2021 FISCAL YEAR

ELECTRIC

Date of Order	Case No.	Company	Rate Request	PSC Decision
07/01/20	ER-2019-0374	Empire District Electric	$26.5 million	$992,400

WATER AND SEWER

Date of Order	Case No.	Company	Rate Request	PSC Decision
08/26/20	WR-2020-0264	Raytown Water Company	$ 663,332	$ 482,575
12/30/20	WR-2020-0275	Elm Hills	$ 135,745	$ 64,361
12/30/20	SR-2020-0274	Elm Hills	$ 393,919	$ 326,474
04/07/21	WR-2020-0344	Missouri-American Water	$ 103 million	$ 30 million
06/09/21	WR-2021-0177	Carl Richard Mills	$ 0	$ (161)

ELECTRIC STATISTICS

Calendar Year 2020 (Missouri Jurisdictional)

Company Name	Operating Revenues	MWhs Sold	Residential Customers	Total Customers
Liberty Utilities, Empire District Electric Co.	$ 453,846,321	3,975,902	132,897	157,395
Evergy Missouri Metro (1)	$ 860,861,170	8,053,770	262,690	299,137
Evergy Missouri West (2)	$ 757,429,647	7,979,927	291,448	347,155
Ameren Missouri (3)	$2,540,139,209	30,601,887	1,071,999	1,236,963
Totals:	**$4,612,276,347**	**50,611,486**	**1,759,034**	**2,040,650**

Source: MoPSC FERC Form 1, 2020 Annual Reports (Missouri Jurisdictional)
(1) Formerly Kansas City Power & Light Company
(2) Formerly KCPL-Greater Missouri Operations Company
(3) Union Electric Company d/b/a

STEAM STATISTICS

Calendar Year 2020 (Missouri Jurisdictional)

Company Name	Operating Revenues	MMBtus Sold	Residential Customers	Total Customers
Evergy Missouri West (1)	$ 15,646,433	2,694,075	0	5
Vicinity Energy Kansas City, Inc.(2) (3)	$ 16,848,122	1,885,675	0	48
Totals:	**$ 32,494,555**	**4,579,750**	**0**	**53**

Source: 2020 Annual Report
(1) Formerly KCPL-Greater Missouri Operations Company
(2) Reported in MLB's
(3) Formerly Veolia Energy Kansas City, Inc.

NATURAL GAS STATISTICS

Calendar Year 2020 (Missouri Jurisdictional)

Company Name	Operating Revenues	Mcfs Sold	Residential Customers	Total Customers
Liberty Utilities	$ 48,235,788	8,342,930	45,900	52,780
Empire District Gas Co.	$ 33,468,909	7,410,550	37,946	43,494
Spire Missouri East (1)	$ 669,985,929	85,338,294	619,635	660,793
Spire Missouri West (2)	$ 448,814,446	76,526,588	495,226	529,315
Summit Natural Gas Co. (3)	$ 29,079,204	3,220,414	15,662	19,139
Ameren Missouri (4)	$ 118,845,594	19,118,994	119,875	133,569
Totals:	**$1,348,429,870**	**199,957,770**	**1,334,244**	**1,439,090**

Source: MoPSC FERC Form 2 2020 Annual Reports (Missouri Jurisdictional)
(1) Formerly Laclede Gas Company
(2) Formerly Missouri Gas Energy, a division of Laclede Gas Company
(3) Formerly Missouri Gas Utility and Southern Missouri Gas Company, L.P. d/b/a
(4) Union Electric Company d/b/a

STAND ALONE WATER AND SEWER COMPANIES FISCAL YEAR 2021*

NAME OF WATER COMPANY	CUSTOMERS	NAME OF SEWER COMPANY	CUSTOMERS
Argyle Estates	53	Cannon Home Association	117
Carl R. Mills	7	Mid-MO Sanitation	34
Environmental Utilities	21	North Oak Sewer District	82
Gascony Water Company	206	Raccoon Creek Utility Operating Company	522
Indian Hills Utility Operating Company, Inc.	669	TBJ Sewer Systems, Inc.	77
Raytown Water Company	6,577	Taneycomo Highlands	26
Rex Deffenderfer Enterprises, Inc.	1,067	Timber Creek Sewer Company	2,315
Ridge Creek (1) (2)	138	TUK LLC	27
Stockton Hills Water Company	140	United Services, Inc.	303
Village Greens Water Company	106	Warren County Sewer Company	34
Whiteside Hidden Acres, LLC	33		
Total Number of Customers	**9,017**	**Total Number of Customers**	**3,537**

*Active Companies as of 06/30/21
(1) Sale/Transfer Pending
(2) Operating Under Receivership

COMBINATION WATER AND SEWER COMPANIES FISCAL YEAR 2021*

COMPANY NAME	WATER CUSTOMERS	SEWER CUSTOMERS
188 N. Summit	41	41
Cedar Green Land Acquisition (1)	54	54
Confluence Rivers Utility Operating Company, Inc.	2,504	2,395
Elm Hills Utility Operating Company, Inc.	137	680
Foxfire Utility Company	258	254
Hillcrest Utility Operating Company	247	252
Holtgrewe Farms Water Company	35	35
Lake Northwoods Utility Company	17	17
Liberty Utilities	7,598	568
Lincoln County Water & Sewer	202	202
Missouri-American Water Company	471,423	14,905
Osage Utility Operating Company, Inc.	372	393
SK&M Water & Sewer Company	259	162
Total Number of Customers	**483,147**	**19,958**

*Active Companies as of 6/30/21
(1) Sale / Transfer Pending

JULY 1 Commission issues decision in The Empire District Electric Company electric rate case authorizing an increase in annual electric revenues of approximately $992,400. When the company filed its rate request on August 14, 2019, it sought an increase of approximately $26.5 million.

JULY 1 Commission approves agreement providing approximately $15 million in one-time bill credits to Spire East and Spire West natural gas customers resolving issues in Spire Infrastructure System Replacement Surcharge (ISRS) cases from 2016, 2017 and 2018 remanded from the Missouri Western District Court of Appeals.

JULY 29 Commission approves an agreement in a case filed by Ameren Missouri seeking a variance from some of its tariffs and some of the Commission's rules allowing Ameren Missouri to implement its Advanced Metering Infrastructure (AMI).

AUGUST 5 Commission approves agreement authorizing Ameren Missouri to continue promoting demand-side programs, including energy efficiency and demand response programs under an extension of Ameren Missouri's Cycle 3 of the Missouri Energy Efficiency Investment Act (MEEIA). The extension of the Cycle 3 MEEIA plan will run through plan year 2022.

AUGUST 19 Commission directs Staff to gather information and file a report on utility service disconnections involving PSC-regulated utilities and the COVID-19 pandemic emergency and attendant economic disruptions. The Commission expressed concern about reports warning of an anticipated wave of utility disconnections after voluntary suspensions of collection activities by Missouri's utilities expire.

AUGUST 26 Commission approves request filed by Confluence Rivers Utility Operating Company to acquire the Port Perry Service Company water and sewer systems.

AUGUST 26 Commission approves agreement authorizing The Raytown Water Company to increase annual water operating revenues by approximately $482,575 effective September 8, 2020. When the company filed its rate case on March 2, 2020, it sought to increase annual water operating revenues by approximately $663,332.

SEPTEMBER 14 Commission joins a national effort in observing Lifeline Awareness Week.

SEPTEMBER 16 Commission grants a CCN to Spire Missouri West to construct, own, operate and maintain a natural gas distribution system providing natural gas service in Cass County, a further expansion of the company's existing certificated area.

SEPTEMBER 23 Commission opens working case to consider an amendment to its Cogeneration Rule.

SEPTEMBER 23 Commission opens working case regarding revenue stabilization mechanisms.

SEPTEMBER 30 Commission approves the sale of the Middlefork Water Company's water production facilities to Nodaway County Public Water District No. 1.

SEPTEMBER 30 Commission approves a tariff filed by The Empire District Electric Company implementing a Community Solar Pilot Program.

OCTOBER 14 Commission opens working case to consider membership of investor-owned electric utilities in Regional Transmission Organizations.

OCTOBER 21 Commission approves agreement granting Spire Missouri an Accounting Authority Order (AAO) to track costs and financial impacts associated with the COVID-19 pandemic.

OCTOBER 28 Commission approves agreement granting Missouri-American Water Company an AAO to track the costs and financial impacts associated with the COVID-19 pandemic.

NOVEMBER 1 Commission Cold Weather Rule takes effect.

NOVEMBER 4 Commission makes modifications to the Missouri Universal Service Fund. The amount of discount for Lifeline voice-only service increases and Commission continues suspension of the assessment that provides funding for the state Universal Service Fund through December 31, 2021, unless the Commission orders otherwise.

NOVEMBER 4 Commission approves territorial agreement between Ameren Missouri and Three Rivers Electric Cooperative for portions of Cole and Osage counties. Also included is a change of supplier for a number of service addresses between the two electric providers.

DECEMBER 2 Commission approves tariffs filed by Spire Missouri, Inc. to help eligible small business customers struggling as a result of the COVID-19 pandemic.

DECEMBER 9 Commission approves Confluence Rivers Utility Operating Company's request to purchase the assets of Branson Cedars Resort Utility Company, Inc., Fawn Lake Water Corp., P.A.G. LLC d/b/a Prairie Heights Water Company and the sewer system assets of the Freeman Hills Subdivision and the DeGuire Subdivision.

DECEMBER 11 Spire Missouri, Inc. files a natural gas rate case with the Public Service Commission seeking a net increase in its base rates of approximately $65 million.

DECEMBER 16 Commission opens case to investigate ten-digit local dialing in some of Missouri's area codes.

DECEMBER 30 Commission approves agreement which authorizes Elm Hills Utility Operating Company, Inc. to increase annual water operating revenues by approximately $64,361 and annual sewer operating revenues by approximately $326,474. When the company filed its cases with the Commission on March 6, 2020, it sought to increase annual water operating revenues by approximately $135,745 and annual sewer operating revenues by approximately $393,919.

- 2021 -

JANUARY 13 Commission approves agreement which authorizes Confluence Rivers Utility Operating Company, Inc. to purchase the water and sewer assets of Terre Du Lac Utilities Corporation.

JANUARY 13 Commission grants Evergy Missouri Metro and Evergy Missouri West an AAO to track costs and financial impacts associated with the COVID-19 pandemic.

FEBRUARY 10 Commission grants a CCN to Ameren Transmission Company of Illinois (ATXI) to operate and maintain interconnection facilities in Schuyler County. The facilities generally consist of a switchyard connecting the High Prairie Wind Generation Facility with ATXI's Mark Twain Transmission Line.

FEBRUARY 24 Commission opens investigatory docket regarding the February 2021 cold weather event.

FEBRUARY 24 Commission grants a CCN to Missouri-American Water Company to install, own, operate and maintain a water system in an area of Stone County (Table Rock Estates Subdivision).

FEBRUARY 24 Commission approves request filed by Missouri-American Water Company to purchase substantially all of the sewer assets of the City of Trimble system as well as substantially all of the sewer assets of Centennial Acres Association, Inc.

MARCH 10 Commission opens working case to review and consider updating and amending certain Public Service Commission natural gas safety rules.

MARCH 10 Commission approves agreements granting Ameren Missouri electric and natural gas AAOs to track the costs and financial impacts associated with the COVID-19 pandemic.

MARCH 15 Commission supports national "Fix-A-Leak Week".

MARCH 24 Commission approves agreement granting Ameren Missouri a CCN to construct, own, operate and maintain a solar generating facility in Montgomery County near New Florence, Missouri.

MARCH 24 Commission approves Ameren Missouri request which will temporarily increase the qualifying federal poverty level associated with Ameren Missouri's Keeping Current Low Income Pilot Program. Ameren Missouri sought the change so that it could provide assistance to additional customers during the COVID-19 pandemic.

MARCH 24 Commission approves Spire Missouri request to extend its COVID-19 residential assistance program.

MARCH 31 Ameren Missouri files an electric rate case with the Commission seeking to increase its electric base rate annual revenues by approximately $299 million.

MARCH 31 Ameren Missouri files a natural gas rate case with the Commission seeking to increase its natural gas base rate annual revenues by approximately $9.4 million.

APRIL 1 Glen Kolkmeyer is appointed as a commissioner to the Public Service Commission by Governor Michael Parson. Commissioner Kolkmeyer was confirmed by the Missouri Senate on May 6, 2021.

APRIL 1 Commission recognizes April as National Safe Digging Month.

APRIL 7 Commission approves an agreement reached in water and sewer rate cases filed by the Missouri-American Water Company granting an increase of approximately $30 million over water and sewer revenues authorized in Missouri-American's last general rate cases which took effect on May 28, 2018. When Missouri-American filed its rate cases on June 30, 2020, it sought an increase of approximately $103 million over water and sewer revenues authorized in its last general rate cases.

APRIL 14 Commission approves an amendment to an Intergovernmental Territorial Agreement between Public Water Supply District No. 2 of St. Charles County and the City of Wentzville. The agreement also modifies certain portions of the boundaries of the two water service areas that the City and District will each serve.

APRIL 14 Commission approves second modified agreement between Ameren Missouri and the Office of the Public Counsel which re-directs approximately $3.5 million to further help low-income customers needing assistance due to the COVID-19 pandemic.

APRIL 28 Commission opens working case to collect stakeholder comments and suggestions regarding locating practices to reduce the amount of pipeline damage in Missouri resulting from insufficient locating practices.

MAY 28 The Empire District Electric Company d/b/a Liberty files an electric rate case with the Public Service Commission seeking to increase gross annual electric revenues by approximately $79.9 million.

JUNE 2 Commission approves Missouri American-Water Company request for a CCN to install, own, operate and maintain a sewer system in and around Taos, Missouri in Cole County.

JUNE 9 Commission approves an agreement which reduces the annual water operating revenues for Carl Richard Mills by approximately $161. When the case was filed on December 21, 2020, Carl Richard Mills sought to maintain its current annual water operating revenues.

COMMISSIONERS PAST & PRESENT

COMMISSIONER	LENGTH OF SERVICE
John M. Atkinson	1913-1916
William F. Woerner	1913-1914
John Kennish	1913-1917; 1920
Frank A. Wightman	1913-1915
Howard B. Shaw	1913-1917
Edwin J. Bean	1914-1925
Eugene McQuillin	1915-1917
William G. Busby	1916-1921
David E. Blair	1917-1920
Noah W. Simpson	1917-1923
Edward Flad	1917-1921
John A. Kurtz	1920-1923
Hugh McIndoe	1921-1923
A.J. O'Reilly	1921-1925
Richard H. Musser	1923-1925
Merrill E. Otis	1923-1924
Thomas J. Brown	1923-1928
D.E. Calfee	1925-1929
Almon Ing	1925-1933
S.M. Hutchinson	1925-1931
J.H. Porter	1925-1933
James P. Painter	1928-1929
Milton R. Stahl	1929-1933
J. Fred Hull	1929-1934
George H. English	1931-1936
J.C. Collet	1933-1935
William Stoecker	1933-1936
W.M. Anderson	1933-1938
Harry E. McPherson	1934-1935
Sam O. Hargus	1935-1937
John S. Boyer	1935-1941
Albert D. Nortoni	1936-1938
John A. Ferguson	1936-1944
J.D. James	1937-1942
Marion S. Francis	1938-1941
Scott Wilson	1938-1941
Paul Van Osdol	1941-1943
Frederick Stueck	1941-1943
Kyle Williams	1941-1952
Charles L. Henson	1942-1959
Albert Miller	1943-1944
Agnes Mae Wilson	1943-1949
Richard Arens	1944-1945
E.L. McClintock	1945-1967
Morris E. Osburn	1945-1952
John P. Randolph	1949-1951
Henry McKay Cary	1950-1955
Maurice Covert	1952-1953
Tyre W. Burton	1952-1965
Frank Collier	1953-1954
M.J. McQueen	1954-1956
D.D. McDonald	1955-1961

COMMISSIONER	LENGTH OF SERVICE
William Barton	1956-1965
Frank J. Iuen	1959-1963
Frank W. May	1961-1967
Donal D. Guffey	1963-1968
William R. Clark	1965-1975
Charles J. Fain	1965-1977
Howard Elliot, Jr.	1967-1970
Marvin E. Jones	1967-1973
Willard D. Reine	1968-1975
James F. Mauze	1971-1975
A. Robert Pierce, Jr.	1973-1977
James P. Mulvaney	1975-1977
Stephen B. Jones	1975-1979
Hugh A. Sprague	1975-1979
Charles J. Fraas	1977-1983
Leah Brock McCartney	1977-1983
Alberta Slavin	1977-1981
Stephanie Bryant	1979-1981
Larry W. Dority	1979-1983
John C. Shapleigh	1981-1984
Charlotte Musgrave	1981-1988
Allan G. Mueller	1983-1996
Connie Hendren	1983-1989
James M. Fischer	1984-1989
William D. Steinmeier	1984-1992
David Rauch	1989-1993
Kenneth McClure	1990-1997
Ruby Letsch-Roderique	1990-1991
Patricia Perkins	1991-1995
Duncan Kincheloe	1992-1997
Harold Crumpton	1993-2000
M. Dianne Drainer	1995-2001
Karl Zobrist	1996-1997
Connie Murray	1997-2009
Robert Schemenauer	1998-2001
Sheila Lumpe	1997-2003
Kelvin Simmons	2000-2003
Bryan Forbis	2001-2003
Steve Gaw	2001-2007
Robert Clayton III	2003-2011
Linward "Lin" Appling	2004-2008
Jeff Davis	2004-2012
Terry Jarrett	2007-2013
Kevin Gunn	2008-2013
Robert S. Kenney	2009-2015
Stephen M. Stoll	2012-2017
Daniel Y. Hall	2013-2019
William P. Kenney	2013-2021
Scott T. Rupp	**2014-present**
Maida J. Coleman	**2015-present**
Ryan A. Silvey	**2018-present**
Jason R. Holsman	**2020-present**
Glen Kolkmeyer	**2021-present**

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