MISSOURI PUBLIC SERVICE COMMISSION

2022 ANNUAL REPORT

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 3, 2022

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, 2021 through June 30, 2022, as well as additional information for the calendar year 2022. The Commission's work this year included the following:

- **Rate Case Filings/Decisions:** The Commission made decisions in a number of rate cases during the fiscal year including natural gas and electric rate cases filed by Union Electric Company d/b/a Ameren Missouri; a natural gas rate case filed by Spire Missouri East and Spire Missouri West d/b/a Spire Missouri; a natural gas rate case filed by The Empire District Gas Company d/b/a Liberty; and an electric rate case filed by The Empire District Electric Company d/b/a Liberty; as well as several staff-assisted small water and sewer cases. During the 2023 fiscal year, Commission decisions are expected in: electric rate cases filed by Evergy Missouri Metro and Evergy Missouri West d/b/a Evergy; water and sewer rate cases filed by Missouri-American Water Company; an electric rate case filed by Ameren Missouri; and a natural gas rate case filed by Spire Missouri; as well as several staff-assisted small water and sewer cases.
- **February 2021 Cold Weather Event**: Much of the Midwest, including Missouri, experienced unseasonably cold temperatures in February 2021 (Winter Storm Uri) which resulted in rolling electrical blackouts and extreme natural gas price spikes. During the 2022 fiscal year, the Commission approved requests by several natural gas companies to extend the Actual Cost Adjustment (ACA) recovery period beyond 12 months thereby spreading the costs from Winter Storm Uri over a longer period of time to help mitigate the impact on Missouri natural gas customers.
- **House Bill 734:** Enacted by the Missouri General Assembly, and signed into law by you, this permits investor-owned utilities to securitize certain costs associated with natural disasters and the retirements of electric generating facilities. Securitization cases were filed during the 2022 fiscal year by Liberty (Winter Storm Uri and the closure of the Asbury power plant) and Evergy (Winter Storm Uri). The Commission will decide those cases during the 2023 fiscal year.
- **Spire STL Pipeline:** The Commission opened a docket to investigate Spire STL Pipeline's application at the Federal Energy Regulatory Commission (FERC) for a temporary certificate to continue operating the Spire STL Pipeline to provide natural gas to the St. Louis area. The Commission also ordered Spire Missouri to file periodic reports on its current contingency plans, ongoing contingency plan development, and conditions affecting its ability to provide adequate natural gas supply and pressure to all of its customers for the winters of 2021-2022, 2022-2023 and 2023-2024.
- **New Telephone Area Codes:** Increasing demand for residential and business telephone numbers created

the need for new area codes in Missouri. The Commission originally adopted overlay plans for the 314 and 816 area codes back in 2000. The Commission delayed implementation in 2001 to allow time to test the effectiveness of telephone number conservation efforts. Those efforts were successful and implementation of telephone number overlay plans for the 314 and 816 area codes remained on hold for more than 20 years. Introduction of the new 557 area code in the current 314 area code region began in August 2022. It is expected an overlay plan in the 816 area code region with the new 975 area code will begin in the second quarter of 2024.

- **Area Code Overlay Plan For the 573 Area Code:** The Commission directed the North American Numbering Plan Administrator (NANPA) to begin implementation of an overlay plan to alleviate the exhaustion of available telephone numbers in the current 573 area code. The new 235 area code will be joining the current 573 area code, ensuring all residential and business customers have a sufficient supply of telephone numbers to serve this area of the state. NANPA has indicated telephone number exhaustion in the current 573 area code is expected in the third quarter of 2024. An overlay plan does not require any customers to change telephone numbers, but it does require ten-digit dialing on all local calls.
- **988 Three-Digit Abbreviated Dialing Code:** The Commission worked with the telecommunications industry to transition the 314, 417, 660 and 816 area codes in Missouri to ten-digit local dialing when the "988" three-digit abbreviated dialing code took effect in July 2022. "988" is a three-digit abbreviated dialing code for the national suicide prevention and mental health crisis hotline.
- **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) through plan year 2023.
- **Liberty Cycle 1 MEEIA:** The Commission approved an agreement authorizing Liberty to implement its first demand-side programs under Liberty's Cycle 1 MEEIA plan which is scheduled to run through December 31, 2022.
- **Evergy MEEIA Cycle 3 Program:** The Commission approved an agreement authorizing Evergy to continue promoting demand-side programs, including energy efficiency and demand response programs by extending its MEEIA Cycle 3 programs an additional year.
- **Wind Generation/Solar:** The Commission approved a certificate of convenience and necessity (CCN) to Evergy to construct an electrical solar production facility at the Hawthorn Generating Station in Evergy Missouri Metro's service area near Kansas City, Missouri.
- **Transportation Electrification Pilot Programs:** The Commission authorized Evergy to implement a suite of Transportation Electrification pilot programs designed to encourage the increased use of electric vehicles. The Commission also approved an agreement authorizing Liberty to implement a Transportation Electrification Pilot Program.
- **Water and Sewer Infrastructure Act Program:** In January 2022, the Commission approved a request filed by the Missouri-American Water Company to establish a Water and Sewer Infrastructure Rate Adjustment (WSIRA) on customer bills. Expansion of the existing water infrastructure system replacement surcharge (ISRS) into the new WSIRA was part of Senate Bill 44 which was passed by the General Assembly and signed into law by you during the 2021 legislative session.
- **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).

I hope you will find this report helpful and useful. If there is any additional information I can provide, please contact me.

Sincerely,

Ryan A. Silvey
Chairman

2022

Table of Contents

CONTACTING THE PSC

Main Phone Number: (800) 392-4211

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

TTY (Text Telephone): (573) 522-9061. (Relay Missouri users may also dial “711” and ask the communications assistant to dial the toll-free number (800) 392-4211.)

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

EFIS Toll-Free Help Desk: (866) 365-0924

Website address: psc.mo.gov

Email address: pscinfo@psc.mo.gov

Local 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 p.m. 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

	Fiscal Year 2023
Public Service Commission	
Public Service Commission-Personal Service	$12,618,350
Public Service Commission-Expense & Equipment	$2,317,106
Public Service Commission-Refunds	$10,000
Total	$14,945,456
Full-Time Employees (F.T.E.)	193.00
Deaf Relay Service and Equipment Distribution Program	
Expense & Equipment Appropriation	$2,495,886
Total	$2,495,886
Full-Time Employees (F.T.E.)	0.00
Manufactured Housing Department	
Personal Service	$437,048
Expense & Equipment	$354,484
Program Specific Distribution (MH)	$50,000
MH-Refunds	$10,000
Subtotal	$851,532
Program Specific Distribution MH Consumer Recovery*	$192,000
Total	$1,043,532
Full-Time Employees (F.T.E.)	8.00
TOTAL BUDGET	**$18,484,874**
TOTAL FTE	**201.00**

*Consumer Recovery Fund Appropriation

PSC COMMISSIONERS

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 2022 he graduated with high honors from Boston University with a Master of Business Administration.

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 an AAA bond rating.

Chairman Silvey has two daughters, Taylor Mansker and Kally Silvey. He resides in Lake Ozark with his wife, Angela. 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.

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 the Select Committee on Regulatory and Industry 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 Michael 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 Fire 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.

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
Jennifer Heintz, Chief Litigation Counsel, External Litigation	751-8701
Morris Woodruff, Secretary/Chief Regulatory Law Judge	751-2849
Kim Happy, Document Control and Records Manager	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
J Luebbert, Manager-Tariff/Rate Design Department	522-8705
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

Kim Bolin, Director	751-5026
Karen Lyons, Manager-Auditing Department	816-889-3949
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
Curtis Stokes, Chief Deputy Counsel-Staff Counsel	751-4227

Area Code is 573 unless otherwise noted

THE ROLE OF THE PSC

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).**

PSC ORGANIZATIONAL FUNCTIONS

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.

KIM BOLIN
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, Sewer and Steam. 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
Chief Staff 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.

SHELLEY BRUEGGEMANN
General Counsel

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.

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 filed on September 1, 2021 and the PSC Staff (Staff) filed its report on October 1, 2021.

On December 21, 2021, the Commission was awarded a U.S. Department of Energy Grant under the Grid Modernization Lab Consortium. The purpose of the grant is to have the DOE provide technical assistance to the Commission to assist in its efforts to integrate DER Aggregation.

(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 Union Electric Company d/b/a Ameren Missouri, Evergy Missouri West, Inc. d/b/a Evergy Missouri West, Evergy Missouri Metro, Inc. d/b/a Evergy Missouri Metro and The Empire District Electric Company d/b/a Liberty to answer a series of questions on RTO membership benefits, costs, and appropriate time period for studying them. 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.

On June 11, 2021, Staff filed its report. In its report, Staff recommended that each electric utility work with their respective RTOs to identify the point in time at which the exit fees applicable to a given utility will reflect the most depreciation for existing projects prior to the inclusion of new projects. The electric utilities were ordered to respond to Staff's recommendation by August 25, 2022.

(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.

On February 25, 2022, a second virtual workshop was held after a request by OPC. After that workshop, OPC filed a motion requesting that interested parties volunteer for a one-month case study with the objective of the case study to ensure that when OPC files the Petition for Rulemaking, the proposed rule meets the goals that began this working group, as expressed in the November 2019 NARUC Resolution.

(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

Senate Bill 745 (SB 745) began as authorization for utility companies to employ a property tax tracker to be used in general rate proceedings instead of the historic test year number. The property tax tracker would compare the difference between property tax included in rates against the actual property taxes paid by the utility. The difference would then be recovered in a future rate case.

The utilities argued that this change was necessary in order to more accurately reflect their changing costs in between rate cases. A number of utility adjacent portions were added, primarily relating to the tax treatment for the purchase of utilities and solar energy systems. With respect to the Commission, SB 745 also authorized a task force to study net metering, extended the Plant-In-Service-Accounting (PISA) statutes out another five years, and provided for discounted electric rates for qualifying new load customers. Other notable portions of SB 745 banned restrictive covenants which limit or prohibit the installation of solar panels on the rooftop of

a property or structure and added individually identifiable customer usage and billing records for municipal utility customers to the list of records which may be closed under Missouri's Sunshine Law.

House Bill 2005 (HB 2005) represents the culmination of a years-long battle between Invenergy's Grain Belt Express transmission line project and private land owners, primarily farmers. The land owners have contended that the Grain Belt project should not be the beneficiary of eminent domain authority as it is primarily a transmission line and does not provide sufficient benefit to Missouri residents the same way as traditional utility providers.

Invenergy contended that they had fulfilled all requirements under the law and that the Grain Belt project could not legally be subject to any new restrictions. The eventual compromise language saw new requirements that transmission line projects have the ability to deliver a proportional share of energy capacity within the state to the total number of miles the line traverses Missouri. The minimum amount of compensation due to owners of agricultural or horticultural land obtained via eminent domain was also raised to 150% of fair market value. Notably, these new requirements are to be prospective only, and do not attach to projects which have applied to the Commission prior to August 28, 2022.

Senate Bill 820 (SB 820) was also truly agreed and finally passed. It was another utility omnibus whose contents were redundant with elements of SB 745 and HB 2005.

ELECTRIC

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 were 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 was 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. The Commission approved agreements in this case with some issues reserved for hearing. Under the agreements, Ameren Missouri will increase annual electric revenues by approximately $220 million. The evidentiary hearing regarding the remaining issues was held on December 12, 2021. The Commission issued its report and order resolving the remaining contested issues on February 2, 2022.

On February 23, 2022, the Commission approved the tariffs implementing new rates to become effective on and after February 28, 2022.

Liberty

(Case No. ER-2021-0312)

On May 28, 2021, Liberty filed an electric rate case with the Commission seeking to increase annual electric revenues by approximately $79.9 million. According to Liberty, the main drivers of the requested rate increase were 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 reflected recovery of approximately $29.9 million of costs incurred by Liberty associated with Winter Storm Uri in February 2021. However, Liberty later sought rate recovery of those costs through a separate "securitization" application pursuant to new legislation that went into effect in 2021.

The Staff, the Office of Public Counsel and other intervening parties filed their recommendations with the Commission regarding Liberty's rate increase request on October 29, 2021.

The Commission approved agreements that authorized Liberty to increase annual electric revenues by approximately $35.5 million, with one issue reserved for hearing. The Commission held that hearing on February 7, 2022, and issued a report and order resolving that issue on April 6, 2022. On May 17, 2022, the Commission approved tariffs implementing new rates to become effective on and after June 1, 2022.

Evergy Missouri Metro

(Case No. ER-2022-0129)
On January 7, 2022, Evergy Missouri Metro filed an electric rate case with the Commission seeking to increase annual electric revenues by approximately 5.65%. According to Evergy Missouri Metro, the rate increase request was due to several drivers including infrastructure investment to improve reliability and enhance customer service as well as property taxes.

The Staff, the Office of Public Counsel and other intervening parties filed their recommendations with the Commission regarding Evergy Missouri Metro's rate increase request on June 8, 2022.

Evidentiary hearings are scheduled for this case from August 29 through September 9, 2022.

Evergy Missouri West

(Case No. ER-2022-0130)
On January 7, 2022, Evergy Missouri West filed an electric rate case with the Commission seeking to increase annual electric revenues by approximately 8.31%. According to Evergy Missouri West, the rate increase request was due to several drivers including infrastructure investment to improve reliability and enhance customer service as well as property taxes.

The Staff, the Office of Public Counsel and other intervening parties filed their recommendations with the Commission regarding the Evergy Missouri West rate increase request on June 8, 2022.

Evidentiary hearings are scheduled for this case from August 29 through September 9, 2022.

OTHER ELECTRIC ISSUES

Ameren Transmission Company of Illinois (ATXI)

(Case No. EA-2021-0087)
On April 21, 2021, Ameren Transmission Company of Illinois (ATXI) filed a Certificate of Convenience and Necessity (CCN) application for a new 138 kV (kilovolt) 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.

On November 3, 2021, the Commission approved an agreement granting ATXI a CCN to own, operate, maintain and manage the transmission line and associated facilities subject to certain conditions.

Ameren Missouri Rush Island Retirement Investigation

(Case No. EO-2022-0215)
On February 15, 2022, the Commission granted a motion filed by Staff to open an investigation into Ameren Missouri's plans to retire the Rush Island Energy Center. On April 15, 2022, Staff filed its initial report with findings and recommendations. On May 4, 2022, the Commission ordered Ameren Missouri to comply with Staff's recommendations.

As of June 30, 2022, Ameren Missouri is continuing to provide the Commission with monthly updates of legal proceedings and retirement plans related to the Rush Island Energy Center.

Liberty Community Transportation Electrification Pilot Programs

(Case No. ET-2020-0390)
On November 29, 2020, Liberty filed an application for approval of a portfolio of programs related to transportation electrification and an Accounting Authority Order (AAO). The pilot program is a five-year program and consists of a Residential Smart Charge Pilot Program, the Ready Charge Pilot Program, the Commercial Electrification Pilot Program, the Electric School Bus Pilot Program, and the Non-Road Electrification Pilot Program.

On January 19, 2022, the Commission approved an agreement authorizing the electrification portfolio, granted variances, and granted an AAO to track and defer program costs for future consideration.

Evergy Missouri Metro and Evergy Missouri West Transportation Electrification Pilot Programs

(Case Nos. ET-2021-0151 and ET-2021-0269)
On February 24, 2021 Evergy Missouri Metro and Evergy Missouri West filed an application for approval of a portfolio of programs related to transportation electrification, an expansion of the clean charge network, the deferral of costs associated with the programs, and related variances from the Commission's promotional practices rule.

The evidentiary hearing regarding the application was held on October 12, 2021. On January 12, 2022, the Commission approved the Residential EV Outlet Rebate Program, Electric Transit Service Rate, a cap increase for the Clean Charge Network, associated variances, and a regulatory asset tracking mechanism.

Evergy Missouri West Special Market Rate

(Case No. EO-2022-0061)
On November 2, 2021, Evergy Missouri West filed an application for approval of a Special High Load Factor Market rate for a Data Center Facility in Kansas City, Missouri.

The evidentiary hearing regarding the Special High Load Factor Market rate was held on January 25-26, 2022. The Commission issued an order approving the Special High Load Factor Market rate on May 18, 2022.

Evergy Missouri Metro and Evergy Missouri West Hawthorn Solar CCN

(Case No. EA-2022-0043)
On December 14, 2021, Evergy Missouri Metro and Evergy Missouri West filed an application seeking a CCN to construct, install, own, operate and maintain solar facilities at the Hawthorn Generating Station in Evergy Missouri Metro's service area in Kansas City, Missouri. The facility would serve as the program resource for Evergy's Solar Subscription Pilot Program. On May 12, 2022, the Commission approved an agreement reached in the case and granted the requested CCN.

Liberty Winter Storm Uri and Asbury Securitization

(Case Nos. EO-2022-0040 and EO-2022-0193)
On January 19, 2022, Liberty filed a petition for a financing order authorizing the financing of extraordinary costs that were incurred during the extreme winter weather event that occurred in mid-February 2021 (Winter Storm Uri). On March 21, 2022, Liberty filed a petition for another financing order related to the financing of costs regarding the retirement of the Asbury coal-fired power plant. Approximately $204.5 million in qualifying extraordinary costs, carrying charges, and legal costs were sought for Winter Storm Uri with an additional $145 million in qualifying energy transition costs related to the Asbury Plant.

On April 27, 2022, the Commission approved a motion from Liberty to consolidate the two securitization cases for the purposes of hearing.

The Staff and the OPC responded to Liberty's petition on May 13, 2022 and evidentiary hearings were held on June 13-16, 2022. A financing order deadline is set for August 22, 2022.

Evergy Missouri West Winter Storm Uri Securitization

(Case No. EF-2022-0155)
On March 11, 2022, Evergy Missouri West filed a petition for a financing order to authorize the financing of extraordinary costs incurred during the extreme winter weather event that occurred in mid-February 2021 (Winter Storm Uri). In its petition, Evergy Missouri West sought to finance qualifying extraordinary costs of $295.6 million plus carrying costs of $54.6 million.

The Staff and the OPC responded to Evergy Missouri West's petition on June 30, 2022. Evidentiary hearings are scheduled for this case from August 1-5, 2022 with a financing order deadline set for October 12, 2022.

Fuel and Purchase Power Prudence Reviews

All four investor-owned electric utilities, Ameren Missouri, Liberty, 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 its 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 2022, Staff completed prudence reviews of fuel and purchased power costs and revenues included in the FACs of Liberty (**Case No. EO-2021-0281**), Evergy Missouri Metro (**Case No. EO-2022-0064**), and Evergy Missouri West (**Case No. EO-2022-0065**).

Staff investigated each utility to determine whether the conduct of the utility's decision-makers was reasonable at the time, under all the circumstances, considering the utility had to make decisions prospectively rather than relying on hindsight. As a result of these prudence reviews, Staff found no imprudence by the decision-makers of Liberty. However, Staff alleged Evergy Missouri West and Evergy Missouri Metro acted imprudently in its management of Renewable Energy Credits (RECs) and recommended the Commission order an adjustment. On July 25, 2022, the Company and Staff filed a non-unanimous stipulation and agreement settling the issue which is pending with the Commission.

Electric Utility Resource Planning Filings

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 normally file on April 1 of each year either a triennial compliance filing or an update filing to comply with 4 CSR 240-22.080(1) or 4 CSR 240-22.080(3), respectively.

Ameren Missouri made its annual update filing on October 1, 2021 (**Case No. EO-2022-0100**). Staff is not required to file a Staff Report for annual updates and did not make a filing in response to Ameren Missouri's annual update. Due to changing circumstances resulting from the earlier than anticipated closing of its Rush Island coal-fired power plant, on June 22, 2022, Ameren Missouri filed its notice of change in its preferred resource plan in **Case No. EO-2022-0362**.

Evergy Missouri Metro and Evergy Missouri West made their annual update filings on June 10, 2022 (**Case Nos. EO-2022-0201** and **EO-2022-0202**, respectively). Although not required, Staff filed comments in response to Evergy's annual update filings on August 12, 2022. The Commission has ordered Evergy to respond to comments by September 15, 2022.

Liberty made its Chapter 22 triennial compliance filing on April 1, 2022 (**Case No. EO-2021-0331**). Staff filed its report, as required by Chapter 22 rules, on August 29, 2022.

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, which are commonly called energy efficiency programs or demand response programs.

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 October 27, 2021, the Commission authorized Ameren Missouri (**Case No. EO-2018-0211**) to extend the existing MEEIA 2019-2021 Plan through Plan Year 2023 with certain program modifications in Plan Year 2023 and the continuation of the Pay As You Save® program to be in effect through Plan Year 2023. The Signatories also agreed on the total budget cap for Plan Year 2023 of $74.65 million.

On May 25, 2022, the Commission approved an agreement that allowed for $6.7 million to be added to Ameren Missouri's MEEIA 2019-2021 Plan Standard and Custom Incentive program budgets.

On September 15, 2021, the Commission approved an agreement filed by Evergy Missouri West, Evergy Missouri Metro, Staff, OPC, and Renew Missouri on an appropriate earnings opportunity for Evergy's PAYS® program. As a part of its Order, the Commission approved Evergy's PAYS® tariff sheets to take effect September 25, 2021.

On May 12, 2022, the Commission authorized Evergy Missouri West and Evergy Missouri Metro (**Case No. EO-2019-0132**) to extend the existing MEEIA Cycle 3 through Plan Year 2023 with certain modifications in Plan Year 2023.

On December 15, 2021, the Commission issued an order in **Case No. EO-2022-0078** which approved an agreement authorizing Liberty to begin its MEEIA Cycle 1 on January 1, 2022, to be in effect through December 31, 2022.

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. All amounts ordered refunded by the Commission shall include interest at the electric utility's short-term borrowing rate.

In fiscal year 2022, Staff completed its first MEEIA prudence review of Cycle 3 energy efficiency programs and Cycle 2 long-lead projects of Evergy Missouri Metro and Evergy Missouri West (**Case Nos. EO-2021-0417** and **EO-2021-0416**, respectively). Staff investigated the utilities to determine whether the conduct of the utility's decision-makers was reasonable at the time, under all the circumstances, considering the utility had to make decisions prospectively rather than relying on hindsight.

As a result of its fiscal year 2021 DSIM prudence review, Staff alleged Evergy imprudently included certain non-MEEIA costs and Home Energy Report throughput disincentive costs in its DSIM. Subsequently, the Commission ordered that $480,181.62, plus interest, be returned to Evergy Missouri Metro customers in its next DSIM Rider rate adjustment filing and $422,469.65, plus interest, be returned to Evergy Missouri West customers in its next DSIM Rider rate adjustment filing.

NATURAL GAS

Spire Missouri

(Case No. GR-2021-0108)
On December 11, 2020, Spire Missouri, Inc. (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 was already being charged to customers through the Infrastructure System Replacement Surcharge (ISRS) rate mechanism. According to Spire Missouri, almost all of the requested increase was 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 also proposed to combine its current tariffs and tariff rules into one set applicable to both its east and west operating units.

On November 12, 2021, the Commission issued its decision authorizing Spire Missouri to increase annual natural gas revenues by approximately $72.2 million, of which approximately $47 million was already being collected through the ISRS on customer bills.

The Commission approved agreements reached by several parties which resolved a number of issues. Under the agreements, Spire East and Spire West will remain as separate rate districts. There was no change to the residential monthly customer charge and Spire will target income-eligible energy efficiency programs in part toward multifamily homes with high energy burdens and/or high arrearages. Spire will also change the name of its Low-Income Energy Affordability Program to the Payment Partner Program. The agreement provides for automatic customer referrals to energy efficiency programs and expansion of program eligibility from 185% of the federal poverty level to 200%.

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 was to include in rates its recent investments in the Ameren Missouri gas system. This filing also fulfilled 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.

On December 22, 2021, the Commission approved agreements authorizing Ameren Missouri to increase annual natural gas revenues by approximately $5 million. The last Ameren Missouri general natural gas rate case that resulted in a rate increase was in January 2011.

Under the agreements, Ameren Missouri will fund a Clean Slate Program for natural gas in the amount of $500,000. In addition, signatories to the agreements will work together to develop a program accomplishing the goals of the critical needs program described in testimony from the Office of the Public Counsel. The agreements also call for Ameren Missouri to discontinue its Rider Delivery Charge Adjustment (DCA) and transition to the Weather Normalization Adjustment Rider (WNAR) for its residential class. Ameren Missouri will also transition its natural gas Energy Efficiency Program to a PAYS® program.

Liberty

(Case No. GR-2021-0320)
On August 23, 2021, The Empire District Gas Company d/b/a Liberty filed a natural gas rate case with the Commission seeking to increase annual natural gas revenues by approximately $1.36 million. According to Liberty, the proposed rate increase was necessary to generally offset or reflect increases in operating costs, the construction of new gas service facilities, as well as return requirements on rate base. Liberty's base rates were last increased effective April 1, 2010.

On June 23, 2022, the Commission approved an agreement which authorized Liberty to increase annual natural gas revenues by approximately $1 million. Under the agreement approved by the Commission: Liberty's Low-Income Weatherization Program will continue; Liberty will modify its Experimental Low-Income Program, re-branded as the Low-Income Affordability Program; and develop a Critical Needs Program. Liberty will also combine the Energy Star® Water Heating and Energy Star® Space Heating programs into a re-branded High-Efficiency Appliance Rebate Program and will add two new programs: the Liberty Energy Education Program and the Energize Liberty Homes Program.

Spire Missouri

(Case No. GR-2022-0179)
On April 1, 2022, Spire Missouri filed a natural gas rate case with the Commission seeking to increase annual natural gas revenues by approximately $151.9 million. Spire Missouri stated in its filing that the proposed rate increase is necessary because the current authorized rates do not reflect Spire Missouri's actual cost of service, nor allow it to earn a reasonable return on investments it has made to benefit customers.

Formal evidentiary hearings in the rate case are scheduled for November 28-30, December 1-2, and December 5-9, 2022.

Winter Storm Uri— Actual Cost Adjustment Filings

(Case Nos. GR-2021-0291, GR-2022-0127, GR-2022-0128, GR-2022-0135, GR-2022-0136, GR-2022-0122)
Much of the Midwest, including Missouri, experienced unseasonably cold temperatures in February 2021 (Winter Storm Uri) which resulted in rolling electrical blackouts and extreme natural gas price spikes. During the 2022 fiscal year, Ameren Missouri, The Empire District Gas Company (Liberty), Liberty Utilities (Midstates Natural Gas), Spire Missouri and Summit Natural Gas made Actual Cost Adjustment (ACA) filings with the Commission reflecting costs associated with Winter Storm Uri. The Commission approved requests by these natural gas companies to extend the ACA recovery period beyond 12 months (or otherwise reduce the purchased gas adjustment) thereby spreading costs from Winter Storm Uri over a longer period of time to help mitigate the impact on Missouri natural gas customers.

Spire Missouri

(Case No. GA-2021-0259)
On November 12, 2021, the Commission approved an agreement which granted Spire Missouri a CCN to construct, own, operate and maintain a natural gas distribution system providing natural gas service in Buchanan County. The CCN is a further expansion of the Company's existing certificated area.

The Commission approved the application determining: 1) There is a need for the service: 2) Spire Missouri is qualified to provide the proposed service; 3) Spire Missouri has the financial ability to provide the service; 4) Spire's proposal is economically feasible; and 5) The service promotes the public interest.

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 (Liberty), 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. The cold weather event ultimately resulted in several marketer complaints related to the issuance of operational flow orders, LDC requests to defer the cold weather event impacts, and investigations surrounding the event itself. Natural gas volatility has not only increased from the February 2021 event but from ongoing international impacts on global supply and demand.

Additional investigations resulted from the Federal Energy Regulatory Commission's certificate process related to Spire STL Pipeline.

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 and renewable gas pipeline operators in Missouri. In 2021 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; the natural gas distribution line serving Ashley energy; and six master meter systems.

In 2021, there were a total of 61 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.

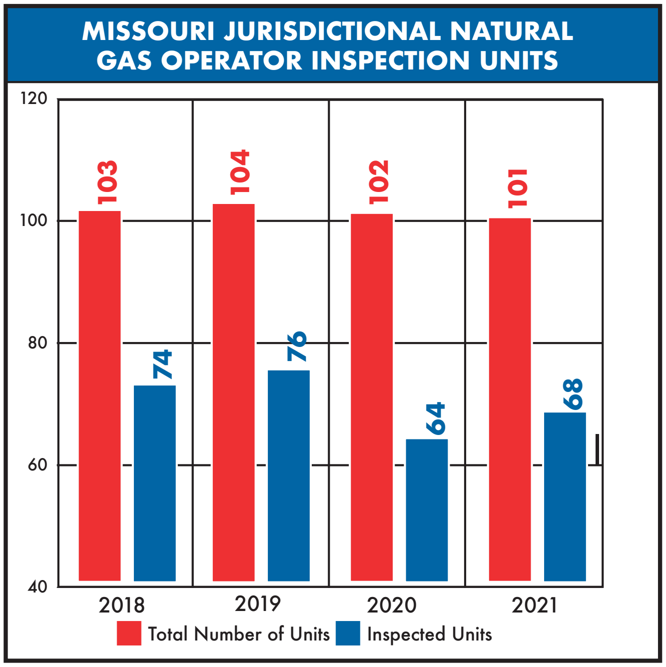
During the 2021 calendar year, PSC Safety Engineering Department Staff conducted over 200 individual inspections, including comprehensive records and field, compliance follow-up, construction, operator qualification, temporary/mobile liquefied natural gas, distribution integrity management, anti-drug 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 GX-2022-0340**. 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.

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 state-wide quality assurance practices for locating underground pipelines. The Commission conducted a public workshop to engage stakeholders on June 17, 2021. The project deliverable was a compilation of best practices for locating quality assurance which was made publically available to stakeholders and 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 FERC. FERC regulates interstate natural gas and electric companies, and its decisions directly affect Missouri natural gas and electric customers. By actively participating in FERC proceedings, the MoPSC is able to represent the interests of all Missouri natural gas and electric customers.

The MoPSC filed its notice of intervention (NOI) in 20 FERC cases during the fiscal year ending June 30, 2022. An NOI allows the MoPSC to become a party and participate in cases before FERC. As a party to a FERC case, the MoPSC may file protests or comments, conduct discovery, review confidential case material, submit testimony or other evidence, and participate in settlement negotiations to resolve any issues brought by the parties to the case. In fiscal year 2022, MoPSC filed either comments or protests in five FERC cases where it had specific concerns about issues affecting Missouri consumers.

The MoPSC also monitors a variety of natural gas and electric FERC cases filed from other regions of the country in order to evaluate issues that may affect Missouri consumers in the future.

FEDERAL NATURAL GAS ACTIVITIES

FERC regulates interstate natural gas pipeline companies, and its regulatory decisions can 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 proceedings where representation of Missouri consumers' interests is otherwise limited or absent. The MoPSC strives to ensure that Missouri consumers receive reliable natural gas transportation service at just and 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 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 with 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, 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 areas 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 its affiliate Spire STL Pipeline for firm transportation capacity to deliver natural gas to its LDC customers.

Thirteen parties intervened in this case, including the MoPSC. Three of the parties filed protests. MoPSC filed a conditional protest. Five parties submitted supporting comments. The protests generally argued that Spire STL Pipeline had not shown that the new pipeline was necessary, and that it could result in adverse rate impacts to existing competing pipelines and their captive customers.

The MoPSC's conditional protest requested that FERC thoroughly examine all of the circumstances and impacts of the proposed pipeline as part of its determination of whether Spire STL Pipeline had shown that construction of the pipeline was in the public interest based on the capacity needs of the areas served. MoPSC raised the importance of FERC respecting traditional state jurisdictional decision-making authority, and raised 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 sited in Illinois, connecting to the Rockies Express Pipeline to provide the St. Louis area with access to shale gas from the eastern United States.

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.

Spire STL Pipeline experienced a number of delays in completion of the pipeline application. In May of 2020, Spire STL Pipeline requested a one-year extension of time to complete the project, citing suspension of construction activities due to COVID-19. 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 place the remaining facilities into service on November 4, 2020.

On January 23, 2020, the Environmental Defense Fund filed a Petition for Review with the U.S. Court of Appeals for the District of Columbia Circuit. On June 22, 2021, the Court of Appeals vacated the FERC Certificate Order and remanded the case to FERC for further consideration.

On July 26, 2021, Spire STL Pipeline filed an application for a temporary certificate to avoid a possible disruption in service. The MoPSC filed limited comments in support of a temporary certificate to continue service to customers while FERC processes and decides the remanded case. On September 14, 2021, FERC issued a temporary certificate for 90 days while it considered action on the remand/vacate order from the Court of Appeals. On December 3, 2021, FERC ordered the temporary certificate to remain in place until it issues a final order on remand. The MoPSC continues to monitor the case in anticipation of FERC's final order.

Panhandle Eastern Pipe Line Company (Panhandle)

(FERC Docket Nos. RP19-78 and RP19-1523)
On July 18, 2018, FERC issued **Order No. 849** 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 2017 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**) after finding that information provided on their 501-G forms indicated both entities may have been substantially 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. However, the issue of a negotiated contract between Southwest and Panhandle (Southwest's only customer) was consolidated with the Panhandle investigation. Panhandle filed a rate case on August 30, 2019, (**RP19-1523**) seeking a cost of service of $408 million. The rate case also was consolidated with the Panhandle investigation. In its rate case, Panhandle sought recovery of the full cost of its negotiated contract with Southwest, which would have eliminated the benefit of the Southwest rate reduction settlement from **RP19-257** from Panhandle's cost of service, meaning that Panhandle's customers would never realize the $6 million reduction in Southwest's storage rates.

The FERC Staff filed testimony in the Panhandle rate case supporting a $236 million cost of service, $172 million less than requested by Panhandle. Several Panhandle customers (including Ameren Services, an affiliate of Ameren Missouri), customer groups (including municipal and industrial customers), the Michigan Public Service Commission and the MoPSC intervened and also filed testimony challenging various elements of Panhandle's cost of service. The intervening parties 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 gas systems 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) presiding over the case issued an initial decision on March 26, 2021. The initial decision recommended an ROE of 11.43%, a reduced cost of service, and lower rates for depreciation and net salvage. The ALJ specifically relied on testimony filed by the MoPSC in her recommendation to uphold FERC precedent preventing affiliate abuse and to reduce Panhandle's annual recovery of costs for its affiliate Southwest by approximately $6.7 million, thereby restoring the benefit of the Southwest rate settlement to Panhandle's customers.

Following the initial decision on May 26, 2021, the MoPSC and other parties filed briefs regarding the initial decision. While several parties have filed requests for FERC to take expedited action on the case, FERC has not issued its final ruling in the case as of June 30, 2022.

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 a $169.8 million increase in its cost of service, a $454.3 million increase in its rate base, an overall rate of return of 11.46%, an ROE of 14.6%, and a continuation of its pipeline system modernization program. Southern Star also requested a 69% increase to its cost of service from its previous rate case, which had been filed in 2013 (**RP13-941**).

Southern Star's proposal also contained a modernization program, under which the pipeline initially proposed to spend at least $88 million annually on system upgrades, plus a 10% annual tolerance, with total program costs of up to $528 million over the next six years. Costs were to be collected from customers beginning November 1, 2021 and spread over the next several years.

On May 12, 2021, the MoPSC filed a protest focused on the ROE, capital structure, depreciation and negative salvage rates, the modernization program and operations and maintenance expenses. Thirty-five other parties intervened. Six other parties protested Southern Star's requests.

In January 2022, following several months of settlement negotiations, all active parties to the case reached a settlement that resolved all issues in the case and resulted in significant annual savings to Missouri customers.

Texas Eastern Transmission, L.P. (Texas Eastern)

(FERC Docket No. RP21-1001, RP21-1188, consolidated)

On July 3, 2021, Texas Eastern filed a rate case (**RP21-1001**). FERC initially rejected Texas Eastern's entire filing, and Texas Eastern filed a subsequent request for a rate increase (**RP21-1188**) on September 30, 2021. On rehearing, FERC reinstated the **RP21-1001** case. FERC consolidated the two dockets.

Texas Eastern claimed a total cost of service of approximately $2.2 billion, which reflected an increase of $75 million over the $1.45 billion annual cost of service established by settlement in Texas Eastern's 2019 rate case. Texas Eastern also requested an ROE of 14.5%. It further requested $567 million in operations, maintenance, general and administrative costs, a 22.7% increase in the two years since their previous rate case filing. These costs included a requested self-insurance reserve adjustment of approximately $22.8 million. Overall, the filing represented an estimated rate increase of 40% for Missouri customers (including Ameren Missouri, Liberty Utilities and municipal gas systems in southeast Missouri). The MoPSC filed a protest on October 12, 2021, citing concerns with Texas Eastern's requested ROE, the self-insurance reserve adjustment, and the significant increase in its operations and maintenance expenses.

The case was set to go to hearing on October 18, 2022. On June 14, 2022, the FERC Chief ALJ issued an order extending the procedural schedule to allow additional time for parties to work on reaching a settlement in the case. The active parties engaged in extensive settlement negotiations, including 12 settlement conferences. On July 7, 2022, they reached a settlement in principle. On July 13, 2022, the FERC Chief ALJ issued an order holding the hearing procedures in abeyance to allow the parties to finalize the settlement. Final settlement documents are expected to be filed by September 15, 2022, for consideration and approval by FERC.

The settlement in principle significantly lowers the rate increase to Missouri customers resulting in substantial annual savings.

ANR Pipeline Company (ANR)

(FERC Docket No. RP22-501)
On January 28, 2022, ANR filed its rate case and requested a total cost of service of $1.125 billion, an increase of approximately $200 million over the company's 2016 rate filing. ANR also claimed a rate base of more than $3.4 billion, requested an ROE of 15.70%, and a modernization tracker to recover the cost of additional upgrades it plans to make in future years. Based on a preliminary analysis, the requested increase would result in a more than 200% increase in the rates ANR charges to Liberty, Summit Natural Gas of Missouri, Inc. and Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty, along with several Missouri municipal systems and ethanol plants.

The MoPSC filed an intervention in the case on March 3, 2022. The case is set for hearing commencing January 24, 2023. The case is currently in the preliminary stages of discovery and settlement negotiations.

Other FERC Cases:

The MoPSC continues to intervene and participate in natural gas pipeline cases that involve gas that pipelines claim is "lost and unaccounted for." 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. A pipeline can recover the cost of lost and unaccounted for gas from its customers.

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 calculations of gas that is lost and unaccounted for. In these types of incidents, the natural gas losses are known, measurable and non-recurring, so the lost gas is not unaccounted for and the cost of that gas should not be recovered from customers. 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.

The MoPSC also continues to monitor cases related to new infrastructure or upgrades to natural gas systems, as well as any FERC rulemakings that may have a direct effect on Missouri customers.

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

The MoPSC intervened in this case and contributed to the comments filed by the Organization of MISO States (OMS). The MoPSC also assisted in developing the parties' litigation strategy prior 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 that MISO transmission owners collected from November 12, 2013, through February 11, 2015. Refunds were issued to MISO members in February 2017, including Ameren Missouri.

Because FERC rules only allow refunds covering a 15-month period in electric complaint cases, MISO transmission customers filed a second complaint case (**EL15-45**) in February 2015 seeking refunds for the period from February 12, 2015 through May 11, 2016. 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 and other parties sponsored rebuttal testimony challenging the current 12.38% base ROE received by shareholder-owned MISO members with transmission formula rates. The 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 to submit briefs regarding FERC's proposed changes to the method used to analyze the ROE component of rates for public utilities under its jurisdiction. FERC's reconsideration of its ROE method stems from a 2017 decision by the U.S. Court of Appeals for the District of Columbia Circuit vacating and remanding FERC's **Opinion No. 531**, in which FERC set the ROE for New England Transmission Owners at the midpoint of the upper half of the zone of reasonableness produced by a two-step DCF analysis. The MoPSC, along with the Mississippi Public Service Commission, the Missouri Joint Municipal Electric Utility Commission and other aligned parties, filed initial briefs to FERC 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 model (CAPM), 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.

In **Opinion No. 569**, FERC applied its revised ROE methodology to both the **EL14-12** and **EL15-45** complaint cases, but denied refunds in the **EL15-45** case. Both cases were decided together, but with different FERC rulings in **Opinions 569** and **569-A** and **569-B**. Both cases are still on appeal together at the DC Circuit. The MoPSC continues to participate in these cases and does not expect a final resolution until the end of 2022 or later.

Regional Electric Transmission Activity

The MoPSC regularly participates in the stakeholder processes of the two RTOs that operate in Missouri: MISO and SPP.

RTOs are organizations established under Title 16 USC §824 and are regulated by FERC's orders and rules. RTOs are charged with operating 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 to their member utilities. The MoPSC participates in the respective RTO stakeholder processes and activities to ensure Missouri electric ratepayers and customers receive reliable and safe services at reasonable rates now and in the future.

The MoPSC Regulatory Analysis Department's Bulk Regional Transmission Unit (BRTU), which is within the General Counsel Division, provides updates and briefings on RTO and FERC activities to Missouri Public Service Commissioners and spearhead the MoPSC's monitoring and interaction of RTOs to promote Missouri's interests.

Southwest Power Pool (SPP)

Three Missouri jurisdictional investor-owned electric utilities are members of SPP: Evergy Missouri Metro; Evergy Missouri West; and Liberty. City Utilities of Springfield, Independence Power and Light, many smaller Missouri municipal utilities, the Missouri Joint Municipal Electric Utility Commission, independent power producers and independent transmission companies 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. SPP manages over 949 generating plants representing over 105,460 megawatts of nameplate generating capacity and over 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 Missouri Public Service Commission to the SPP Regional State Committee (RSC) in fiscal year 2022. Commissioner Rupp provides Missouri perspectives and input to the RSC as it develops collective state-regulatory/state commission guidance to the SPP Board of Directors and working groups. Commissioner Rupp also served on the SPP **Order 2222** taskforce in fiscal year 2022 to provide a state-regulator's perspective on Distributed Energy Resources as SPP prepared its FERC mandated compliance filing, and tariff and business practices.

SPP RSC Activities

The SPP delegated to the RSC, authority to set SPP resource adequacy requirements and transmission cost recovery policies oversight, and authorizes the RSC to compel SPP to submit filings before 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 RSC Comments to FERC

In October 2021, the SPP RSC filed comments in FERC's *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection* docket (**RM21-17**), in which it generally supported improvements to and expansion of the transmission planning and interconnection processes. MoPSC Staff and Commissioner Rupp participated in the drafting of that document.

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. The CAWG also monitors and participates in other SPP stakeholder working groups to ensure adequate state oversight throughout the SPP grid management process. The CAWG chair coordinates its activities with the SPP staff and the RSC as it sets the CAWG's 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 monitors and participates in SPP's Supply Adequacy Working Group (SAWG) as it evaluates technical policy and operational details to ensure SPP region-wide resource adequacy.

In fiscal year 2021 and fiscal year 2022, 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 when called upon to do so. 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.

MoPSC 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 and engineering and costs reviews, and electric energy markets rules reviews. The following bullets identify where MoPSC Staff participated and provided support.

- ### Resource Adequacy

  As noted above, the SPP RSC has primary resource adequacy authority in the SPP and it follows that it has authority to oversee generator capacity accreditation policies and practices and the setting of the SPP reserve margin. In practice, the details of resource accreditation, the setting of reserve margin levels and other matters relating to resource adequacy are developed and refined by the SPP SAWG, on which a MoPSC BRTU Staff member sits as a liaison member to the RSC and reports to the MoPSC.

  The RSC is evaluating several recommendations for SPP to adopt new winter season enforceable reserve margin requirements, enhanced conventional resource accreditation practices including payment for performance standards, Effective Load Carrying Capability standards to accredit renewable resources, new generator interconnection market products, and reserve zones based on the ability of the Grid to deliver needed capacity and energy to specific points. Many of these recommendations are actively debated but may be instituted in fiscal year 2023.

- ### SPP "Safe Harbor" Review

  Led by a member of the MoPSC BRTU Staff, CAWG initiated its review of the SPP "Safe Harbor" in fiscal year 2022. SPP's Safe Harbor represents a dollar amount of transmission upgrades used to provide service in response to a new transmission service request. If the transmission service request provides benefits to the SPP region as well as to the original requestor and satisfies the requirements discussed below, it is eligible for "Safe Harbor" treatment, that is, part of the cost of the transmission upgrade is shared among the entire SPP region.

This ongoing review, expected to conclude by the end of calendar year 2022, is studying the appropriateness of both the "Safe Harbor" dollar amount, currently $180,000 / MW, as well as the three criteria for eligibility for the Safe Harbor. Those criteria are:

- A transmission service contract *to deliver* capacity of at least five years is or must be executed;
- No more than 20% of resource capacity may be from wind resources-that is, the upgrade may not interconnect sufficient wind resources that the Load Serving Entity's resource mix is less than 80% non-wind.; and
- The capacity of the upgrade may not exceed more than 125% of a utility's forecast load; that is, the upgrade may not be "over-built" at the region's expense.

CAWG and RSC members are expected to debate and suggest any possible changes to the "Safe Harbor" dollar amount and/or eligibility criteria in early fiscal year 2023.

• Continuing the February 2021 Polar Vortex Response

SPP formed the Improved Resource Adequacy Taskforce (IRATF) in September 2021 to evaluate how SPP performed under the February 2021 winter storm, and to develop and offer recommendations to the SPP RSC and SPP Board of Directors to meet such challenging conditions and minimize detrimental consumer impacts in the future.

The IRATF identified that fuel availability, generator outage coordination, and generator capacity accreditation were three such factors SPP was required to manage, and is in the process of developing recommendations for the RSC and SPP Board to consider and implement. Other issues the IRATF are evaluating include:

- Fuel assurance
- Resource Planning and Availability
- Emergency Response Processes and Planning
- [Grid] Operator Tools and Communications Processes
- Seams Agreements
- Market Redesign

The IRATF meets at least monthly and consists of commissioners from several SPP states, state commission staff, including MoPSC BRTU Staff, and company executives. IRATF meetings are open to the public.

• Continuing Involvement with the SPP Holistic Integrated Tariff Team (HITT)

In 2018, the SPP recognized a need to reexamine comprehensively many 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 and established the HITT to conduct needed reviews and offer recommendations revealed needs. Cost allocation of transmission projects received special attention from MoPSC BRTU Staff, as authority of that issue resides within the RSC. The HITT sunset this year.

A representative from the MoPSC BRTU Staff served on the HITT and analyzed many of its proposals.

• Continuing Involvement with the SPP's Strategic and Creative Re-Engineering of Integrated Planning Team (SCRIPT)

In 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. This process required input 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 shares the obligations to pay for transmission projects;
- Energy exports and interregional planning, which are critical to Missouri as it sits on the SPP-MISO and SPP-AECI seams[1];
- Decision quality and optimization, critical as they determine which transmission projects are approved for construction.

SCRIPT is a process that was initially scheduled to conclude in October 2021 but has not completed its work. It is presumed that SCRIPT will sunset after the SPP Board's acceptance of SCRIPT's final report.

• SPP Consolidated Planning Process Task Force (CPPTF)

In fiscal year 2022, SPP began implementation of several SCRIPT initiatives with the creation of the Consolidated Planning Process Task Force (CPPTF), looking to combine the planning of generator owner-benefiting and consumer-benefiting transmission projects into one simultaneous process. A member of the MoPSC BRTU Staff was appointed to the task force to provide the Missouri and state regulator perspective.

1 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.

The first step of the CPPTF was to provide education to its members on how the current separate transmission project planning processes worked. Towards the end of fiscal year 2022 and expected to continue into fiscal year 2023, the CPPTF pivoted towards discussion of how a possible combined process would work, as well as determining how any costs for transmission projects would be split among consumers and generator owners.

- **SPP Order 2222 Task Force**

  FERC issued **Orders 2222**, **2222-A** and **2222-B** (**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 of retail electric utility customers. SPP established a taskforce to inquire of state regulators, electric cooperatives, municipal utilities and investor-owned utilities what their Distributed Energy Resource regulations, policies and practices are and to develop and draft SPP policies, business practices and tariff language to comply with **Order 2222**.

  Missouri Commissioner Scott Rupp was appointed by the SPP RSC to represent collective SPP states' interests to the taskforce. SPP submitted its **Order 2222** compliance filing to FERC on April 28, 2022 with a proposed effective date of the end of calendar year 2022 with implementation beginning in 2025. FERC has not yet ruled on the compliance filing.

Midcontinent Independent Transmission System Operator (MISO)

MISO serves Ameren Missouri, Columbia Water and Light, the Missouri Joint Municipal Electric Utility Commission and several smaller municipalities and cooperatives generally on the eastern side of Missouri. MISO coordinates electric utility operations across 15 states, the City of New Orleans and the Canadian province of Manitoba.

MISO manages almost 65,800 miles of high voltage transmission lines in the United States, conducts on-going Grid expansion planning, operates wholesale day-ahead and real-time energy markets, and has dispatch control of 6,773 generating units representing almost 200,000 MW of nameplate generating-capacity. MISO also coordinates inter-RTO grid management with other RTOs and non-RTO utilities such as SPP, the Tennessee Valley Authority, the Southern Companies and Associated Electric Cooperatives, Inc.

MISO Long Range Transmission Plan

After an October 2019 MISO-OMS workshop presentation on the topic, MISO began a significant Long Range Transmission Planning (LRTP) effort which is transitioning from planning to development.

During fiscal year 2022, MISO refined the LRTP concept into four Tranches two of which will focus on building transmission projects in MISO's north and central regions (Tranches 1 and 2), Tranche 3 will focus on transmission projects in MISO south and Tranche 4 will focus on enhancing the electrical interconnections between MISO south and the rest of MISO. Tranche 1 projects have been identified and incorporated into the 2023 MISO Transmission Expansion Plan (MTEP 23) and will be offered for competitive development. Requests for proposals will be issued for Tranche 1 projects after the MISO board approves MTEP 23 in September or December 2022. Current estimates for Tranche 1 exceed $10 billion. Missouri project costs in Tranche 1 are estimated in excess of $1.3 billion.

Cost allocations for the LRTP Tranches 1 & 2 projects will be shared among the MISO north and central regions and exclude MISO south. The MISO north and central regions will not share in cost allocations for Tranche 3 and the cost allocations for Tranche 4 have not been discussed. FERC approved the LRTP cost allocation plan in **FERC Docket No. ER22-995** issued May 18, 2022.

Calendar Year 2022 Resource Adequacy

On April 14, 2022, MISO released its Planning Year 2022/2023 Planning Resource Auction (PRA) results. The PRA is the mechanism by which MISO determines how much generating capacity it will need to meet its region-wide forecasted peak load plus required reserves for the coming planning year (June 1-May 31). The PRA also sets the price of capacity on a per megawatt-day basis. This year, MISO determined a Planning Reserve Margin Requirement of about 135.3 gigawatts. Missouri's forecasted requirements are slightly over 8,274 megawatts and will receive a capacity payment of $236.66/megawatt-day, which is $231.66/megawatt-day higher than last year. Missouri's generators should be able to meet this requirement. However, this year's PRA indicates the shortfall for the MISO north and central zones is 1,230 megawatts and the 2022 OMS/MISO survey indicates the shortfall will persist through at least 2027. Explanations for the shortfall include the increased rate at which fossil-fueled generators are retiring and the rapid return of load from the COVID-19 slow-down.

- ### Changes to the MISO Resource Adequacy Construct (RAC)

  The MISO and the Resource Adequacy Subcommittee (RASC) has started work to reformulate MISO's RAC. Currently, the RAC is the PRA discussed above, however, it has become necessary to expand the PRA from a single, annual construct basing its results on summer peak energy requirements to four single-season constructs with each season having different planning requirements.

  Changing to four single-seasonal RAC/year will allow better generation maintenance scheduling, and permit lower reserve requirements in the fall and spring than the current summer-based requirements demand. Employing four single-season RACs will permit better forecasting for and management of renewable resources as the pace of conventional (thermal) generator retirements accelerates.

  MoPSC BRTU Staff participate in the RASC.

MISO Market Subcommittee

The MISO Market Subcommittee is the stakeholder group charged with monitoring the adequacy of MISO's markets-the annual capacity auction discussed above, energy and ancillary services, financial transmission rights (a hedging mechanism).

- ### Changes to Scarcity Pricing

  Scarcity pricing sets prices when the energy market enters tight capacity conditions. Under *normal* conditions, MISO's energy market sets Locational Marginal Prices, wholesale energy prices, based on demand bids and supply offers in local markets. However, when capacity becomes tight, MISO must incent resources from non-MISO generation to provide capacity and energy to MISO and should non-MISO resources become scarce the remaining emergency-only MISO resources must be compensated at a price reflective of their value given the then existing conditions.

  The normal-market mechanism will provide such incentives but in a lumpy manner meaning that some non-MISO or emergency resources will be either over-compensated or under-compensated for the value they provide and fail to appropriately incent such generator owners to provide their generators to MISO under threatening conditions. MISO is seeking to smooth the lumpiness in the pricing mechanism which will likely take several years.

  MoPSC BRTU Staff participate in the MISO Market Subcommittee.

Organization of MISO States and MoPSC Participation

The Organization of MISO States (OMS) is the Regional State Committee that provides state-regulatory commission input to MISO and the MISO board. The OMS is an agency entirely independent of MISO.

MoPSC Chairman Ryan Silvey currently serves on the OMS Board of Directors as OMS' At-Large member, is the OMS Liaison Commissioner to the MISO Planning Advisory Committee, is the MISO Seams Commissioner-Liaison, and sits on the MISO Advisory Committee. He is also a member of the MISO Executive Committee.

As a member of the OMS Board, Chairman Silvey coordinates with and seeks to develop consensus among the OMS (which is independent of MISO) as it monitors MISO, federal and regional entities' 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 seeks to coordinate and improve seams matters between MISO and SPP.

Continuing Involvement in the Cost Allocation Principles Committee

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 cost allocations principles for projects developed through MISO's Long Range Transmission Planning Process.

The committee established and approved basic principles in April 2021 that have been incorporated into and guide MISO's stakeholder discussions determining the proper cost allocation for LTRP projects. After discussions with other stakeholders, the MISO cost allocations applicable to the LRTP projects were approved by FERC in **Docket No. ER22-995** issued May 18, 2022.

OMS Participation in FERC Dockets

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 MoPSC BRTU's work in this area included editing and participating in input sessions for comments in many varied subjects such as (but not limited to):

- FERC Notice of Proposed Rulemaking (NOPR) Transmission Pricing Queue Reform, **Docket No. RM22-14**;
- NOPR Transmission System Planning Performance Requirements for Extreme Weather, **Docket No. RM 22-10**, **RM22-16**;

- Distributed Energy Resources, **Order 2222**, **Docket No. ER22-1640**;
- **Docket No. EL22-56**, Complaint of Iowa Coalition for Affordable Transmission;
- **Docket No. RM21-17** Advanced NOPR on Transmission Planning and Cost Allocation;
- NOPR on Dynamic Line Ratings, **Docket No. AD22-5**;
- MISO proposal to revise its completive transmission process, **Docket No. ER22-1955**.

FERC Order 2222 Filings for both MISO and SPP

- **FERC Order 2222** required RTO's to file implementation plans on how each RTO would integrate distributed energy resources into their markets and enable them to become full market participants. The MoPSC filed comments in both the MISO 2222 filing (**ER22-1640**) and the SPP 2222 filing (**ER22-1697**) in April, 2022 and expressed general support for the filings while encouraging transparency and stakeholder involvement as an integral part of the process.

• FERC Litigation Involving SPP and MISO

- The MoPSC also participated in and did not oppose the settlement of, the **FERC case of City of Prescott, AR, et.al. vs. SPP and MISO, et.al (FERC Dockets EL17-89 and EL19-60**; settlement filed on June 29, 2022 in favor of the aggrieved parties in the amount of approximately $200,000) regarding the assessment of certain congestion charges associated with loads that are pseudo-tied out of MISO and into SPP (which caused pancaked rates to Prescott and other cities), and resulted in overlapping congestion charges being assessed by both MISO and SPP. The settlement certification does not establish a new tariff or rates and the RTO's have since reprogrammed their systems so it will not happen again.

Continuing Involvement in the OMS/MISO Survey

In 2012, MISO recognized a deficiency in its ability to forecast resource adequacy existed: it did not (and does not) have the authority to seek out the generator build-out plans of its member utilities. MISO asked OMS to help it develop a survey and use the good offices of the state commission-members of OMS to encourage MISO utilities to voluntarily share with MISO those plans thus providing a five-year non-firm estimate of the utilities resource adequacy plans. OMS conducts the survey annually. OMS and MISO staff evaluate the responses and issue a report in June.

The 2022 OMS/MISO Survey Report was published June 10, 2022 and found that the MISO north and central regions (Missouri is in MISO central) will have a capacity deficit of about 204 gigawatts below the amount required to serve forecasted load plus reserves. These findings are similar to and reinforce the MISO 2022 PRA results. The capacity deficit is restricted to MISO north and central and is offset by capacity imports from MISO south and from non-MISO generation.

The capacity deficits are projected to widen over the next 5 years. The calendar year 2023 outlook projects Missouri, Illinois and Indiana to have a shortfall in meeting their capacity requirements while the rest of the MISO north and central states appear to be able to meet their requirements. The capacity shortfall for Missouri and Illinois is expected to persist through 2027, whereas all other zones are anticipated to be able to meet their requirements by depending on planned resources—that is, the completion of project that do not exist today.

Continuing Involvement with the OMS-SPP RSC Seams Liaison Committee (SLC)

In the fall of 2020, MoPSC Chairman Silvey was named the OMS Commissioner-Liaison to the OMS-SPP SLC. MoPSC BRTU Staff continued, as in the past, to support the activities and goals of the SLC.

The SLC performed the following in fiscal year 2022:

- Worked on the list of its previously published recommendations, with emphasis on the areas on interregional planning (including recommendations on Targeted Market Efficiency Project (TMEP)-style projects) and rate pancaking;
- Held meetings within the Rate Pancaking Working Group to determine the significance of the rate pancaking issue across the MISO-SPP seam. The full SLC is expected to discuss a straw proposal of possible actions to take based on the Rate Pancaking Working Group's accumulated research through August 2022.
- Received updates on MISO and SPP staff work on TMEP-style projects and enumerated the possible design thereof. MISO and SPP announced their calendar year 2022 Coordinated System Plan Study would be to implement a TMEP style project type.
- Received updates from MISO and SPP on the Joint Transmission Interconnection Queue (JTIQ) study, which was performed by MISO and SPP in response to SLC directives involving interregional planning and generator interconnection issues. The JTIQ study analyzed generator needs along the northern portion of the MISO-SPP seam, including Missouri, and generated a report of

seven projects, including one in the Kansas City area, that would help with reliability issues related to future generator interconnections. Work on the JTIQ study is expected to continue into fiscal year 2023, with discussions expected to include: (1) how such transmission projects would be paid for, including a potential cost split between consumers and generators; and (2) how this and future studies could replace the need for affected system studies, which currently study the impact of a generator on neighboring planning areas.

WATER AND SEWER DEPARTMENT

The main functions of the Water, Sewer and Steam Department (WSS 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 WSS Department is investigating customer complaints regarding quality of service issues. WSS 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 27 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 WSS 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 2022, three small utilities filed for a small company rate increase. A small water or sewer utility is a utility that serves fewer than 8,000 customers.

A rate case was filed by Mid-Mo Sanitation LLC (**Case No. SR-2021-0372**) which sought to increase annual sewer revenues by approximately $22,000. The Commission approved an agreement on November 17, 2021, which granted an increase in annual sewer revenues of approximately $18,980. Mid-Mo Sanitation, LLC currently provides sewer service to approximately 33 customers. During the 2022 fiscal year, rate requests were also filed by SK&M Water & Sewer (**Case No. WR-2022-0240**), and Argyle Estates (**Case No. WR-2022-0345**). Both cases will be decided by the Commission during the 2023 fiscal year.

Large Rate Case

On July 1, 2022, Missouri-American Water Company (MAWC), the largest water and sewer utility under Commission jurisdiction, filed water and sewer rate cases with the Commission seeking to increase annual operating revenues by approximately $99.6 million (**Case No. WR-2020-0344 consolidated with SR-2020-0345**). These cases will be decided by the Commission during the 2023 fiscal year.

Receivership Actions

When the Commission determines that an owner is unwilling and/or unable to provide safe and adequate service, the Commission may petition the circuit court to appoint a receiver and attach the assets of the utility, and while petitioning the court may place the utility under control of an interim 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 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 2022, 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 WSS 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.

Mergers and Acquisitions

In fiscal year 2022, a number of mergers and acquisitions cases were filed with the Commission.

On October 14, 2021, the Commission approved the merger of Confluence Rivers Utility Operating Company, Inc.; Hillcrest Utility Operating Company, Inc.; Elm Hills Utility Operating Company, Inc.; Osage Utility Operating Company, Inc.; Raccoon Creek Utility Operating Company, Inc.; and Indian Hills Utility Operating Company, Inc. (**Case Nos. WM-2021-0412 & SM-2021-0413**). Under the merger, Confluence Rivers Utility Operating Company, Inc. is the surviving entity.

On November 3, 2021, the Commission approved a request filed by MAWC to purchase the water and sewer systems in and around Garden City (**Case No. WA-2021-0391**). On November 17, 2021, the Commission approved a MAWC request to purchase the City of Hallsville sewer system (**Case No. SA-2021-0017**). On December 1, 2021, the Commission approved MAWC's request for a CCN to install, own, operate and maintain a water and sewer system in and around the City of Orrick (**Case No. WA-2022-0049**).

On December 8, 2021, the Commission approved an agreement granting Liberty Utilities a CCN to install, own, operate and maintain water and sewer systems in Bolivar (**Case No. WA-2020-0397**). On December 15, 2021, the Commission approved a request filed by Confluence Rivers Utility Operating Company, Inc. to acquire Cedar Green Land Acquisition, LLC (water and sewer); The Missing Well, Inc. (water and sewer); Shelton Estates Sewer Company; Ozark Clean Water Company's Spring Branch Subdivision (water); Prairie Heights, LLC-Sullivan (sewer); and Clemstone Sewer District of Platte County (**Case Nos. WA-2021-0425 & SA-2021-0426**).

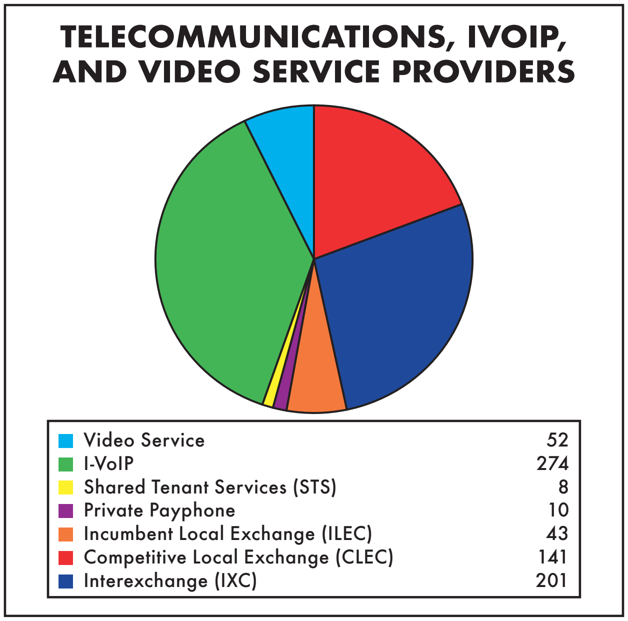
On April 6, 2022, the Commission approved the sale of TUK, LLC sewer assets to Seven Springs Sewer & Water LLC (**Case No. SM-2022-0131**) and on June 9, 2022, the Commission approved MAWC's request to purchase the City of Eureka's water and sewer system (**Case No. WA-2021-0376**).

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 702 to 729. In general, IVoIP providers, ILECs, CLECs and IXCs are subject to various reporting and assessment requirements.



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 authority permits the MoPSC to examine and verify telephone numbering needs involving individualized company-specific situations. In the 2022 fiscal year, the MoPSC did not receive any safety valve requests.

988 Three-Digit Abbreviated Dialing Code

The "988" three-digit abbreviated dialing code for the national suicide prevention and mental health crisis hotline went into effect on July 16, 2022. In order for this dialing code to work, ten-digit local dialing is required for any area code with a "988" NPA prefix. This issue affected Missouri's 314, 417, 660 and 816 area codes and any carrier within these codes with seven-digit local dialing.

Affected carriers were required to follow a national transition process including accommodating at least a six month time period where local calls could be dialed using seven or ten digits. Carriers were also given some flexibility on the date seven-digit local dialing was eliminated. Companies were required to report the completion of certain milestones and the MoPSC Staff assisted the North American Numbering Plan Administrator with compliance efforts.

314 and 816 Area Code Relief

The 314 and 816 area codes are projected to run out of telephone numbers in the third quarter of 2022 and second quarter of 2024, respectively. Telephone number relief will be provided by simply assigning telephone numbers with a new area code in each area. Telephone numbers containing the 557 area code will be assigned in the 314 area while telephone numbers with a 975 area code will be assigned in the 816 area. Telephone numbering relief efforts should be completed in August 2022 for the 314 area while relief efforts for the 816 area will begin sometime in 2023.

573 Area Code Relief

Telephone numbers are currently projected to exhaust in the 573 area code during the third quarter of 2024. Telephone numbers with the 235 area code will ultimately be assigned in the 573 area. In order to accommodate this form of telephone number relief, all local calls will need to be dialed on a ten-digit basis by February 2024.

AREA CODE	PROJECTED DATE OF TELEPHONE NUMBER EXHAUSTION*
314	3rd quarter of 2022
417	3rd quarter of 2028
573	3rd quarter of 2024
636	*Exhaust date exceeds 30 years*
660	*Exhaust date exceeds 15 years*
816	2nd quarter of 2024

**Forecast as approved by the FCC in April 2022.*
The exhaust dates are reviewed twice a year by numbering authorities.

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, three companies applied for ETC status ultimately raising the number of Missouri companies with ETC status to 89 companies.

High-Cost 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, 64 companies received approximately $215 million in federal high-cost support in 2021.

A significant portion of this funding is for broadband expansion. For example, $182 million of the $215 million in high-cost support provided in 2021 is to expand broadband service. This funding typically obligates a company to expand broadband service to a designated number of locations within a limited time period.

A total of 52 companies are receiving this funding to expand broadband service to 324,797 targeted locations lacking adequate broadband service capability. As of the end of 2021, these companies expanded broadband service to 254,905 of these locations. Different broadband deployment obligations and deadlines apply to these companies depending on the specific funding received through the high-cost program. Any company receiving high-cost program funding for broadband expansion purposes must track and meet broadband deployment milestones to ensure broadband is being deployed in a timely manner. Financial consequences can apply if a company is unable to meet broadband deployment obligations.

Additional high-cost program funding is being released to further expand broadband service in Missouri. The Rural Digital Opportunity Fund will further expand broadband service to rural areas designated by the FCC as unserved or underserved. Companies will receive this funding for 10 years but must complete broadband deployment obligations within six years. The funding is being released to 22 companies to expand broadband service to 136,184 Missouri rural targeted locations. These companies will be using last mile technologies of fiber, fixed wireless or both. The FCC solely determines the targeted areas and awards funding using a unique competitive bid process.

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.

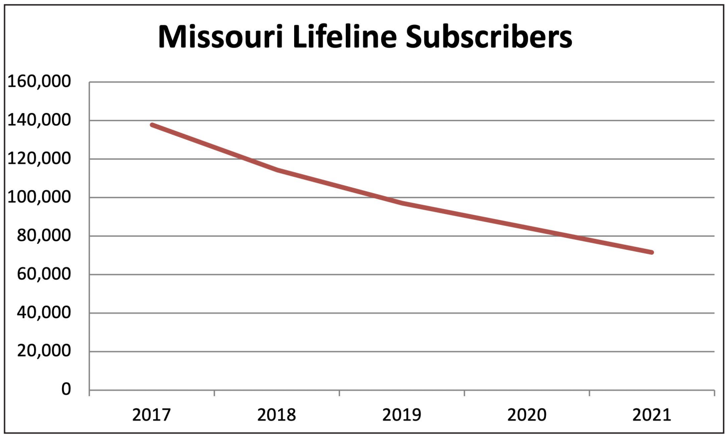
Lifeline Program

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 USF and the Missouri USF.

Federal funding for the Lifeline program has gradually reduced support for voice service and is scheduled to be eliminated December 1, 2023. Missouri USF support has increased to offset federal reductions so that a landline Lifeline subscriber receives a total discount of $24.00. Missouri USF Lifeline support is currently $18.75 for voice-only service and $14.75 for voice service combined with a qualifying broadband service. Per Missouri law, Missouri USF support is not offered to wireless providers or for broadband-only service.

Consumers participating in the following programs are eligible for the Lifeline program: Missouri HealthNet, Food Stamps, 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.

As of June 2022, there were approximately 4.9 million Lifeline subscribers nationwide. Missouri has 66,778 Lifeline subscribers, which is a decrease from the prior year of 71,556 Lifeline subscribers. Of these subscribers, approximately 2,000 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 the 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 315 subscribers were participating in the program in June 2022 versus approximately 300 subscribers a year earlier.

Affordable Connectivity Program (ACP)

This federal program replaced the Emergency Broadband Benefit Program on December 31, 2021. ACP provides a qualifying subscriber with a $30.00 monthly discount for broadband service and up to $100.00 for the purchase of computer and broadband-related equipment. Approximately 212,185 Missouri households currently participate in the ACP.

A consumer qualifies for ACP if they are eligible for the Lifeline program, have a total household income at or below 200% of the federal poverty level, participates in the Women, Infants and Children (WIC) program, 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, or meets the eligibility criteria for a participating provider's existing low-income program, and that provider received FCC approval for its eligibility verification process.

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 intrastate revenues of landline telecommunications companies and interconnected VoIP providers. Companies can recover this assessment directly from consumers by applying a monthly Missouri USF surcharge. Fund administration is awarded to an independent third party through a competitive bid process.

The Missouri USF fund balance has decreased from $1,782,070 to $957,217 during the June 2021 through June 2022 time period. In **Case No. TO-2019-0346**, the MoPSC suspended the Missouri USF assessment effective January 1, 2020 through December 31, 2022. The assessment will be reinstated on January 1, 2023 at the rate of .0015. Revenue generated by this assessment is expected to enable the fund balance to remain at a reasonable level for several years.

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 MoPSC oversees the provisioning of relay and CapTel services in Missouri. Relay and CapTel services are awarded to a provider through a competitive bid process.

The Relay Missouri Fund balance has declined from $1,504,884 to $913,719 during the July 1, 2021 to June 2022 time period. The Relay Missouri Fund is funded by a per line monthly surcharge applied to each landline providing basic local telecommunications service or interconnected VoIP service. The MoPSC increased the surcharge from $.04 to $.10 on June 1, 2022. This increase should enable the fund's balance to remain at a reasonable level for several years.

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 90 companies maintain their rates on their website.

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 31 new interconnection agreements were filed with the MoPSC and 21 interconnection agreements were revised.

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 2022 fiscal year, the Program licensed 159 manufacturers, 204 retail dealers, and 98 installers. Field Staff conducted a total of 14 consumer complaint inspections.

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.

Manufactured Homes & Modular Units

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. The speed of installation compared to a site built structure provides schools with a timely alternative that can be incorporated into larger projects while other buildings are being erected.

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.

In March of 2022, the Program updated several fees that had not been previously changed to reflect changes in the cost of living and other factors. Since then, Program Staff have conducted multiple meetings with industry stakeholders to discuss their concerns, goals, and ideas for the industry to continue to improve as a whole.

Missouri Attends National Conference

The federal office of Manufactured Housing Programs hosted a national conference for the first time in several years, which was attended by the Missouri Manufactured Housing and Modular Units Program Manager. Attending the conference, the Program Manager was able to discuss upcoming changes to the existing HUD Standards; network with other state agencies and industry professionals; and interact with federal program officials during breakout sessions.

STATISTICS FOR FISCAL YEAR 2022

Registered Manufacturers	159
Registered Dealers	204
Registered Installers	98
Homes Sold (New & Used)	2,118
Consumer Complaint Inspections	14
On-Site Inspections	413
Dealer Lot Inspections	17
Dealer Lot Investigations	8
Modular Unit Seals Issued	954
Modular Unit Plans Approved	364
Installer Decals Issued	1,306

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 2022 fiscal year including small utility rate cases, formal complaints, general rate cases, certificate applications, investigatory dockets, tariffs, rulemakings and working groups.

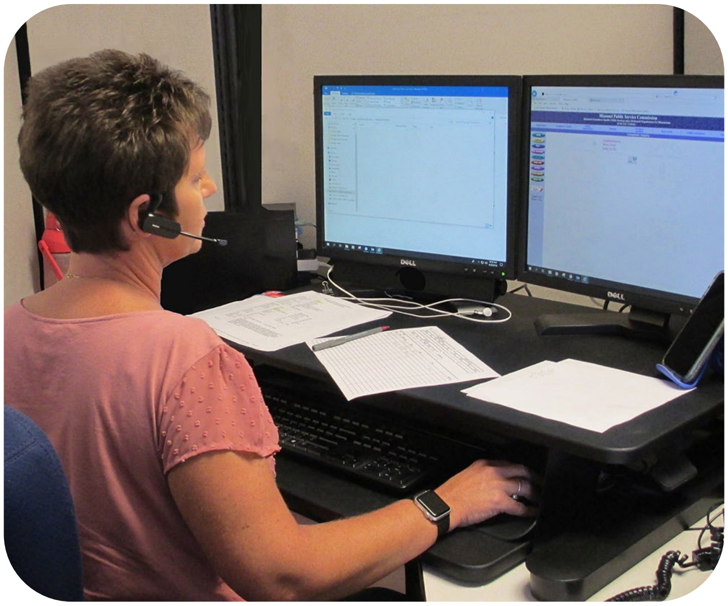
CXD Staff monitors and responds to certain public comments, provides testimony and analysis on customer service issues, participates in energy advisory groups and attends local public hearings.

CXD Staff performed service quality analysis during the 2022 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 2022 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 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 Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service* **(Case No. ER-2021-0240)**,
- *In the Matter of The Empire District Gas Company's d/b/a Liberty Request to File Tariffs to Change its Rates for Natural Gas Service* **(Case No. GR-2021-0320)**,
- *In the Matter of Staff's Investigation of Spire STL Pipeline's Application at FERC for a Temporary Certificate to Operate* **(Case No. GO-2022-0022)**,
- *In the Matter of the Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West Request for a Waiver of Various Tariffs and Regulations Related to Automated Metering Infrastructure* (**Case No. EE-2022-0071**).

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, electric, water and sewer companies.



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 5,000 customer-related contacts in fiscal year 2022. Contacts include complaints, inquiries regarding rules and regulations, information requests, non-jurisdictional requests and public comments related to pending utility cases.

RATE CASES DECIDED DURING THE 2022 FISCAL YEAR

ELECTRIC

Date of Order	Case No.	Company	Rate Request	PSC Decision
02/02/22	ER-2021-0240	Ameren Missouri	$299 million	$220 million
04/06/22	ER-2021-0312	Liberty	$79.9 million*	$35.5 million

*Request included approximately $29.9 million of costs incurred by Winter Storm Uri in February 2021 which Liberty later sought to recover through a separate "securitization" application.

NATURAL GAS

Date of Order	Case No.	Company	Rate Request	PSC Decision
11/12/21	GR-2021-0108	Spire Missouri	$112.3 million**	$72.2 million**
12/22/21	GR-2021-0241	Ameren Missouri	$ 9.4 million	$ 5.0 million
06/23/22	GR-2021-0320	Liberty	$1.36 million	$1.0 million

**Included approximately $47.3 million already being collected from customers through the Infrastructure System Replacement Surcharge (ISRS).

WATER AND SEWER

Date of Order	Case No.	Company	Rate Request	PSC Decision
11/17/21	SR-2021-0372	Mid-Mo Sanitation	$22,000	$18,980

ELECTRIC STATISTICS

Calendar Year 2021 (Missouri Jurisdictional)

Company Name	Operating Revenues	MWhs Sold	Residential Customers	Total Customers
Liberty Utilities, Empire District Electric Co.	$ 474,937,567	4,185,550	134,566	159,370
Evergy Missouri Metro (1)	879,046,317	8,237,220	265,853	300,844
Evergy Missouri West (2)	778,231,136	8,320,976	290,561	336,644
Ameren Missouri (3)	2,722,091,373	31,120,872	1,077,436	1,244,260
Totals:	**$4,854,306,393**	**51,864,618**	**1,768,416**	**2,041,118**

Source: MoPSC FERC Form 1, 2021 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 2021 (Missouri Jurisdictional)

Company Name	Operating Revenues	MMBtus Sold	Residential Customers	Total Customers
Evergy Missouri West (1)	$ 18,462,707	2,704,236	0	5
Vicinity Energy Kansas City, Inc.(2) (3)	39,137,135	1,966,640	0	49
Totals:	**$ 57,599,842**	**4,670,876**	**0**	**54**

Source: 2021 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 2021 (Missouri Jurisdictional)

Company Name	Operating Revenues	Mcfs Sold	Residential Customers	Total Customers
Liberty Utilities	$ 47,218,086	8,358,281	45,647	52,541
Empire District Gas Co.	36,791,118	7,588,283	37,779	43,353
Spire Missouri East (1)	684,414,786	83,757,194	621,624	662,813
Spire Missouri West (2)	673,458,611	74,797,933	498,622	532,897
Summit Natural Gas Co. (3)	31,745,531	3,392,399	15,874	19,423
Ameren Missouri (4)	134,670,138	21,371,713	120,765	134,544
Totals:	**$1,608,298,270**	**199,265,803**	**1,340,311**	**1,445,571**

Source: MoPSC FERC Form 2 2021 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

COMBINATION WATER & SEWER COMPANIES*

Fiscal Year 2022

COMPANY	WATER CUSTOMERS	SEWER CUSTOMERS
188 N. Summit	43	43
Confluence Rivers Utility Operating Co.	4,321	4,400
Foxfire Utility Company(1)	258	254
Holtgrewe Farms Water Company	39	0
Lake Northwoods Utility Company	17	7
Liberty Utilities	7,633	597
Lincoln Co. Sewer & Water	224	202
Missouri-American Water	473,394	15,631
SK&M Water & Sewer	282	170
TOTALS	**486,211**	**21,304**

*Active Companies as of 06/30/22
(1) Sale/Transfer Pending

STAND ALONE WATER & SEWER COMPANIES*

Fiscal Year 2022

WATER COMPANY	CUSTOMERS
Argyle Estates	53
Carl R. Mills	7
Environmental Utilities	22
Gascony Water Company	205
Raytown Water Company	6,577
Rex Deffenderfer Enterprises, Inc.(1)	1,067
TUK LLC	27
Stockton Hills Water Company	144
Village Greens Water Company	109
Whiteside Hidden Acres, LLC	33
TOTALS	**8,244**

SEWER COMPANY	CUSTOMERS
Cannon Home Association	119
Mid-Mo Sanitation	33
North Oak Sewer District	82
TBJ Sewer Systems, Inc.	79
Taneycomo Highlands	29
Timber Creek Sewer Company	2,346
Seven Springs Sewer & Water	27
United Services, Inc.	321
Warren County Sewer Company	34
TOTALS	**3,070**

*Active Companies as of 06/30/22
(1) Sale/Transfer Pending

JULY 28 Commission opens docket to investigate Spire STL Pipeline application at FERC for a temporary certificate to operate pipeline.

AUGUST 23 The Empire District Gas Company d/b/a Liberty files a natural gas rate case with the Commission seeking an increase in its base distribution revenues of approximately $1.36 million.

SEPTEMBER 1 Commission orders Spire Missouri to file periodic reports on its current contingency plans, ongoing contingency plan development and conditions affecting its ability to provide adequate natural gas supply and pressure to all of its customers for the winters of 2021-2022, 2022-2023 and 2023-2024.

SEPTEMBER 20 Missouri Public Service Commission supports National Lifeline Awareness Week.

OCTOBER 14 Commission approves merger of Confluence Rivers Utility Operating Company, Inc.; Hillcrest Utility Operating Company, Inc.; Elm Hills Utility Operating Company, Inc.; Osage Utility Operating Company, Inc.; Raccoon Creek Utility Operating Company, Inc.; and Indian Hills Utility Operating Company, Inc. Under the merger, Confluence Rivers Utility Operating Company, Inc. is the surviving entity.

OCTOBER 14 Commission grants a CCN to Elm Hills Utility Operating Company to install, own, operate and maintain a sewer system in Johnson County, as an addition to Elm Hills' existing service territories.

OCTOBER 23 Commission approves agreement extending Ameren Missouri's Cycle 3 of the Missouri Energy Efficiency Investment Act (MEEIA). Extension of the Cycle 3 MEEIA plan will run through plan year 2023.

NOVEMBER 1 Commission Cold Weather Rule takes effect.

NOVEMBER 3 Commission files comments in FERC Spire STL Pipeline case urging FERC to immediately extend the 90-day temporary certificate for the Spire STL Pipeline that is currently set to expire on December 13, 2021.

NOVEMBER 3 Commission approves MAWC request to purchase water and sewer systems in and around Garden City, Missouri.

NOVEMBER 3 Commission approves agreement granting ATXI a CCN to own, operate, maintain and manage a 15-mile, 138 kV (kilovolt) transmission line and associated facilities in Perry and Cape Girardeau counties.

NOVEMBER 12 Commission approves agreement granting Spire Missouri a CCN to construct, own, operate and maintain a natural gas distribution system providing natural gas service in Buchanan County. The CCN would be a further expansion of the Company's existing certificated area.

NOVEMBER 12 Commission issues amended Report and Order in a natural gas rate case filed by Spire Missouri. The Commission's decision grants a net increase in Spire's annual natural gas operating revenues of approximately $24.9 million. When Spire filed its rate request on December 11, 2020, it sought a net increase in its annual distribution rates of approximately $65 million.

NOVEMBER 17 Commission approves agreement authorizing Mid-MO Sanitation, LLC to increase annual sewer operating revenues by approximately $18,980. When Mid-MO Sanitation, LLC filed its sewer rate case on April 23, 2021, it sought to increase annual sewer operating revenues by approximately $22,000.

NOVEMBER 17 Commission approves MAWC request to purchase the City of Hallsville sewer system.

DECEMBER 1 Commission grants MAWC request for a CCN to install, own, operate and maintain a water and sewer system in and around the City of Orrick.

DECEMBER 1 Commission approves electric territorial agreement between the Osage Valley Electric Cooperative Association and the City of Rich Hill which designates the boundaries of each electric service provider within the City of Rich Hill.

DECEMBER 8 Commission approves agreement granting Liberty Utilities (Missouri Water) LLC d/b/a Liberty Utilities CCNs to install, own, operate and maintain water and sewer systems in Bolivar, Missouri. These water and sewer systems are currently owned and/or operated by the City of Bolivar.

DECEMBER 15 Commission approves the sale of approximately 1.5 miles of 161 kV transmission line from Ameren Missouri to the Wabash Valley Power Association. The transmission line runs from Wabash Valley's Trail of Tears substation to its Charmin Bulk substation in southeast Missouri.

DECEMBER 15 Commission approves request filed by Confluence Rivers Utility Operating Company, Inc. to acquire Cedar Green Land Acquisition, LLC (water and sewer); The Missing Well, Inc. (water and sewer); Shelton Estates Sewer Company (sewer); Ozark Clean Water Company's Spring Branch Subdivision (water); Prairie Heights, LLC-Sullivan (sewer); and Clemstone Sewer District of Platte County (sewer).

DECEMBER 15 Commission approves agreement authorizing Liberty to implement demand-side programs under Liberty's Cycle 1 MEEIA Plan. Liberty's Cycle 1 MEEIA Plan will run from January 1, 2022 through December 31, 2022.

DECEMBER 22 Commission approves territorial agreement and a change of supplier between Grundy Electric Cooperative and the City of Galt. The agreement will allow Grundy to purchase Galt's electric facilities and provide electric service to 114 electric service locations in Grundy County.

DECEMBER 22 Commission approves agreement in a natural gas rate case filed by Ameren Missouri. Under the agreement, Ameren Missouri will increase annual natural gas revenues by approximately $5 million. When Ameren Missouri filed its natural gas rate request with the Commission on March 31, 2021, it sought to increase annual natural gas revenues by approximately $9.4 million.

2022

JANUARY 7 Evergy Missouri Metro files an electric rate case with the Commission seeking a net increase in its electric base rates of approximately 5.65%.

JANUARY 7 Evergy Missouri West files an electric rate case with the Commission seeking a net increase in its electric base rates of approximately 8.31%.

JANUARY 12 Commission approves second amendment to an electric territorial agreement between Liberty and White River Valley Electric Cooperative which involves a service area within the Rainbow Shoals Subdivision in Taney County.

JANUARY 12 Commission approves MAWC request to establish a Water and Sewer Infrastructure Rate Adjustment (WSIRA) on customer bills.

JANUARY 12 Commission approves addendum to an electric territorial agreement between Ameren Missouri and the Lewis County Electric Cooperative Association regarding exclusive electric service areas within Scotland County.

JANUARY 12 Commission authorizes Evergy Missouri West and Evergy Missouri Metro (Evergy) to implement a suite of Transportation Electrification pilot programs designed to encourage the increased use of electric vehicles.

JANUARY 19 Commission approves agreement authorizing Liberty to implement a Transportation Electrification Pilot Program.

FEBRUARY 2 Commission approves agreement in an electric rate case filed by Ameren Missouri. Under the agreement, Ameren Missouri will increase annual electric revenues by approximately $220 million. When Ameren Missouri filed its electric rate request with the Commission on March 31, 2021, it sought to increase annual electric revenues by approximately $299 million.

FEBRUARY 9 Commission approves application filed by GridLiance High Plains, LLC to sell approximately 10 miles of 69 kV transmission lines and related facilities located in Christian and Greene counties to the Missouri Joint Municipal Electric Utility Commission. Upon the closing of the transaction, the Commission authorized GridLiance to terminate its responsibilities as an electrical corporation in Missouri.

FEBRUARY 23 Commission approves change in the Relay Missouri surcharge from $0.04 to $0.10 per line per month.

MARCH 14 Commission supports national “Fix-A-Leak Week”.

MARCH 24 Commission opens case to consider telephone number relief in the 573 area code in Missouri.

APRIL 1 Commission recognizes April as National Safe Digging Month.

APRIL 1 Spire Missouri files natural gas rate case with the Commission seeking a net increase in its natural gas revenues of approximately $151.9 million.

APRIL 6 Commission approves agreements which authorize Liberty to increase annual electric revenues by approximately $35.5 million. When Liberty filed its rate request on May 28, 2021, it sought to increase annual electric revenues by approximately $79.9 million.

APRIL 6 Commission approves the sale of TUK, LLC sewer assets to Seven Springs Sewer & Water LLC.

APRIL 21 Commission directs the North American Numbering Plan Administrator (NANPA) to proceed with an overlay plan in the 573 area code in Missouri.

MAY 10 NANPA announces that a new area code, 235, will be joining the 573 area code under the 573 area code overlay plan.

MAY 12 Commission approves agreement granting Evergy a CCN to construct, own, operate, maintain and manage an electrical solar production facility at the Hawthorn Generating Station in Evergy Missouri Metro’s service area in Kansas City, Missouri.

MAY 12 Commission approves agreement extending Evergy’s Cycle 3 of the Missouri Energy Efficiency Investment Act (MEEIA). Extension of the Cycle 3 MEEIA plan will run through plan year 2023.

JUNE 1 Missouri Hot Weather Law takes effect.

JUNE 9 Commission approves MAWC request to purchase the City of Eureka’s water and sewer systems.

JUNE 23 Commission approves agreement reached in The Empire District Gas Company d/b/a Liberty natural gas rate case authorizing an increase in annual natural gas revenues of approximately $1 million. When Liberty filed its rate request on August 23, 2021, it sought to increase annual natural gas revenues by approximately $1.36 million.

JUNE 29 Commission approves extension of an electric territorial agreement between the City of Poplar Bluff and Ozark Border Electric Cooperative in Butler County.

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
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**

Missouri Public Service Commission
200 Madison Street
Jefferson City, Missouri 65102
psc.mo.gov
1-800-392-4211