

2023
Annual Report

**MISSOURI
PUBLIC SERVICE
COMMISSION**



1913—2023

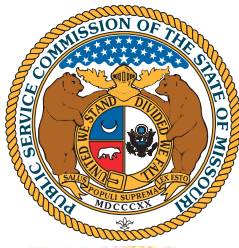
Serving Missourians for 110 Years



COMMISSIONERS



Pictured left to right: Commissioner **Glen Kolkmeier**; Commissioner **Maida J. Coleman**; Chairman **Scott T. Rupp**; Commissioner **Jason R. Holsman**; Commissioner **Kayla Hahn**.



Missouri Public Service Commission

MAIDA J. COLEMAN
Commissioner

KAYLA HAHN
Commissioner

SCOTT T. RUPP
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 5, 2023

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

Dear Governor Parson:

In 1913, the 47th General Assembly passed legislation sponsored by Carroll County Senator William Busby creating the Missouri Public Service Commission. Signed by Governor Elliott Major, the law took effect on April 15, 1913. This year, the Commission celebrates 110 years of service to the citizens of Missouri.

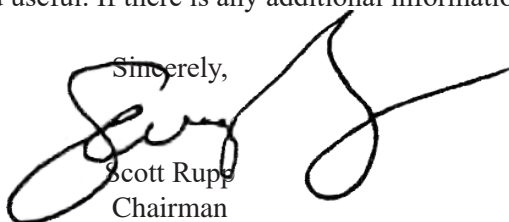
As Chairman of the Missouri Public Service Commission, it is my pleasure to submit the agency's Annual Report for the fiscal year July 1, 2022 through June 30, 2023. The Commission's work for the fiscal year includes the following:

- **Rate Case Filings/Decisions:** The Commission made decisions in a number of rate cases during the fiscal year including electric rate cases filed by Union Electric Company d/b/a Ameren Missouri; Evergy Missouri Metro and Evergy Missouri West (Evergy Missouri); water and sewer rate cases filed by Missouri-American Water Company; a natural gas rate case filed by Spire Missouri East and Spire Missouri West d/b/a Spire Missouri; as well as several staff-assisted small water and sewer cases.
- **Securitization Cases:** During the 2022 legislative session, the Missouri General Assembly passed House Bill 734 which permits investor-owned utilities to securitize certain costs associated with natural disasters and the retirements of electric generating facilities. During the 2023 fiscal year, the Commission issued decisions in securitization cases filed by The Empire District Electric Company d/b/a Liberty (Winter Storm Uri and the closure of the Asbury power plant) and Evergy Missouri (Winter Storm Uri).
- **Wind Generation/Solar:** The Commission approved an agreement granting Ameren Missouri a Certificate of Convenience and Necessity (CCN) to construct, own, operate and maintain a 200 megawatt solar generation facility in Audrain and Ralls counties. Ameren Missouri was also granted a CCN to construct, install, own, operate, manage, maintain and otherwise control and manage a 150 megawatt solar generation facility located in White County, Illinois. In addition, the Commission granted Evergy Missouri West a CCN to acquire, own, operate, manage, maintain and control an existing and operational wind generation facility in the Oklahoma counties of Woodward, Ellis and Dorsey.
- **Transmission Lines:** The Commission approved an agreement authorizing Ameren Transmission Company of Illinois (ATXI) a CCN to construct, own, operate and maintain transmission facilities in, around and between the cities of New Madrid and Sikeston. The Commission also approved an agreement which granted a CCN to NextEra Energy Transmission Southwest, LLC to construct, install, own, operate and

maintain approximately nine miles of a 345 kV transmission line and associated facilities in Barton and Jasper counties.

- **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 but delayed implementation 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 and it is expected that 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 continues to work with the North American Numbering Plan Administrator (NANPA) regarding 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. A six-month permissive dialing period started in late August 2023 to give consumers adequate time to adjust to the dialing changes.
- **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.
- **211 Service:** The Commission approved requests filed by the United Way of Greater Kansas City, Inc. f/k/a The Heart of America United Way and the United Way of Greater St. Louis, Inc. to continue as information and referral providers for purposes of providing 211 service in Missouri.
- **Liberty Cycle 1 MEEIA:** The Commission approved an agreement extending Liberty’s Missouri Energy Efficiency Investment Act (MEEIA) Cycle 1 plan through December 31, 2023, in order to continue promoting demand-side programs, including energy efficiency and demand response programs.
- **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 view all public information filed in cases through the Commission’s Electronic Filing and Information System (EFIS), established in 2002. A long-term project has been updating and enhancing EFIS. This year, the Commission will roll-out a new and improved EFIS that includes increasing the public’s access to information, improved searchability and functionality for users, and increases system security. Consumers can continue to 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).

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

Sincerely,

Scott Rupp
Chairman



2023

Table of Contents

Contacting the PSC	6
Budget	7
Commissioner Biographies.....	8-11
Key Personnel/Organizational Functions ...	12-15
Regulatory Activity	16-43
Year-In-Review	44-46
Commission History 1913.....	47
Commissioners Past and Present	51



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.-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



Fiscal Year 2024

Public Service Commission

Public Service Commission-Personal Service	\$13,716,145
Public Service Commission-Expense & Equipment	\$2,311,041
Public Service Commission-Refunds	<u>\$10,000</u>

Total \$16,037,186

Full-Time Employees (F.T.E.) 192.00

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	\$475,071
Expense & Equipment	\$354,484
Program Specific Distribution (MH)	\$50,000
MH-Refunds	<u>\$10,000</u>
Subtotal	\$889,555

Program Specific Distribution MH Consumer Recovery* \$192,000

Total \$1,081,555

Full-Time Employees (F.T.E.) 8.00

TOTAL BUDGET **\$19,614,627**
TOTAL FTE **200.00**

*Consumer Recovery Fund Appropriation



PSC COMMISSIONERS



Scott T. Rupp,
Chairman

Scott T. Rupp was sworn in at the Missouri Public Service Commission in April of 2014. In January 2023, Rupp was appointed Chairman by Governor Michael Parson. 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, Chairman 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.

Chairman 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, as well as a graduate of the 2016 Institute for Regulatory Law & Economics 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. Commissioner Holsman also serves as the Seams

Representative on the Organization of MISO States (OMS) for the Midcontinent Independent System Operator (MISO).

In addition to Commissioner Holsman's responsibilities at the Commission, his involvement in the National Association of Regulatory Utility Commissioners (NARUC) includes his appointment as Chair of the NARUC International Relations Committee. He is also a member on the Energy Resources and the Environment Committee.

Prior to his appointment to the Missouri Public Service Commission, 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 Kolkmeier, Commissioner

Commissioner Kolkmeier 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 Kolkmeier 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. While in the House, he also served on the House Transportation Commission and the House Utility Committee.

Commissioner Kolkmeier 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 Kolkmeier 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 Kolkmeier attends Calvary Baptist Church in Odessa. He currently resides in rural Odessa with his wife, Lisa. They have two children, Eric and Emily, and nine grandchildren.



Kayla Hahn, Commissioner

Commissioner Kayla Hahn was appointed to the Missouri Public Service Commission by Governor Michael Parson on June 1, 2023. Prior to her appointment, Commissioner Hahn was on the Governor's senior staff team as Policy Director and had served as Senior Advisor and Policy

Director for Governor Parson since August 2018.

As Policy Director, Commissioner Hahn helped lead the Governor's legislative agenda, prepare the Governor's annual budget recommendations to the General Assembly, implement the Governor's policy priorities across all 17 Executive Branch agencies, and spearhead the state's response to COVID-19. As a member of the senior staff, Commissioner Hahn also represented the State of Missouri on the Southern States Energy Board and the Midwestern Higher Education Commission.

Prior to her tenure in the Governor's office, Commissioner Hahn served as Assistant Director and Research Analyst for the Missouri Senate Division of Research from 2013 until 2018.

Commissioner Hahn received a Bachelor of Science in political science from Missouri State University and a Master of Arts and Doctor of Philosophy in political science from the University of Missouri-Columbia.

Commissioner Hahn and her family reside in Jefferson City, Missouri.



Ryan Silvey, Commissioner

Ryan 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 Parson on September 17, 2018.

While at the Commission, Silvey represented the Missouri Public Service Commission on the Board of Directors for the Organization of MISO States (OMS). Within OMS, he was a member of the Seams Liaison Committee.

Prior to his appointment to the Public Service Commission, Silvey was a Missouri State Senator, serving the 17th Senatorial District since January 2013. While in the Senate, he 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. In addition, 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.

Before winning election to two terms in the State Senate, Silvey served four terms in the Missouri House of Representatives, from 2005 through 2012. During that time, he was Chairman of the Appropriations General Administration Committee, Chairman of the Joint Committee on Capital Improvements and Leases Oversight, as well as Vice-Chairman of the Small Business Committee, and Vice-Chairman of the Homeland Security Committee. In 2011, Silvey became Chairman of the powerful House Budget Committee, making him the youngest Legislative Budget Chairman in the nation.

Chairman Silvey resigned from the Commission in January, 2023.



PSC KEY PERSONNEL

COMMISSIONERS

Scott T. Rupp, Chairman	573-751-4221
Maida J. Coleman, Commissioner	573-751-4132
Jason R. Holsman, Commissioner	573-751-0946
Glen Kolkmeier, Commissioner	573-526-7796
Kayla Hahn, Commissioner	573-751-7440

ADMINISTRATION DIVISION

Loyd Wilson, Director	573-751-7435
Douglas Anderson, Legislative Director	573-522-8708
Jay Eastlick, Manager-Consumer Services	573-751-3160
John Hanauer, Manager-Information Services	573-522-2453
Kevin Kelly, Public Relations Director.....	573-751-9300
Connie Landolt, Manager-Budget and Fiscal Services.....	573-751-5604
Debbie Quick, Public Relations Coordinator	573-522-2760
Consumer Services Toll-Free Hotline.....	800-392-4211
EFIS Toll-Free Help Desk.....	866-365-0924

GENERAL COUNSEL DIVISION

Shelley Brueggemann, General Counsel.....	573-526-7393
Jennifer Heintz, Chief Litigation Counsel, External Litigation	573-751-8701
Nancy Dippell, Secretary/Chief Regulatory Law Judge	573-751-8518
Kim Happy, Document Control and Records Manager	573-522-6225
Cherlyn Voss, Manager-Regulatory Analysis Department.....	573-751-3966

INDUSTRY ANALYSIS DIVISION

Jim Busch, Director	573-751-7529
Claire Eubanks, Manager-Engineering Analysis Department.....	573-526-2953
Brad Fortson, Manager-Energy Resources Department	573-751-7528
Curtis Gateley, Manager-Water & Sewer Department	573-526-6029
J Luebbert, Manager-Tariff/Rate Design Department.....	573-522-8705
Kathleen McNelis, Manager-Safety Engineering Department	573-751-3456
David Freeman, Manager-Manufactured Housing Department	573-837-3327
John Van Eschen, Manager-Telecommunications Department	573-751-5525
Manufactured Housing Toll-Free Hotline	800-819-3180

FINANCIAL & BUSINESS ANALYSIS DIVISION

Kim Bolin, Director	573-751-5026
Karen Lyons, Manager-Auditing Department.....	816-889-3949
Contessa King, Manager-Customer Experience Department.....	573-751-5239
David Sommerer, Manager-Procurement Analysis Department.....	573-751-4356
Seoungjoun Won, Manager-Financial Analysis Department	573-526-5164

STAFF COUNSEL DIVISION

Kevin Thompson, Chief Staff Counsel	573-751-6514
Whitney Scurlock, Chief Deputy Counsel-Staff Counsel	573-751-7434
Travis Pringle, Deputy Counsel-Staff Counsel	573-751-5700
Casi Aslin, Deputy Counsel-Water and Sewer-Staff Counsel.....	573-751-8517
Jeff Keevil, Deputy Counsel-Electric-Staff Counsel	573-526-4887
Nicole Mers, Deputy Counsel-Electric-Staff Counsel.....	573-751-6651
Scott Stacey, Deputy Counsel-Natural Gas-Staff Counsel	573-522-6279

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



SHELLEY BRUEGGEMANN
General Counsel



NANCY DIPPELL
Secretary of the Commission /
Chief Regulatory Law Judge

STAFF COUNSEL DIVISION

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

GENERAL COUNSEL DIVISION

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

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

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

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 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.

On May 24, 2023, the Commission posted the Lawrence Berkeley National Laboratory Report on Third-Party Aggregation in the Midcontinent Independent System Operator (MISO) and the Southwest Power Pool (SPP). Based upon this report, the Commission asked for additional comments, which were filed by interested stakeholders in June of 2023.

A second workshop was scheduled to be held on July 10, 2023.

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 the PSC Staff (PSC Staff or Staff) to investigate the issue and asked Ameren Missouri, Evergy Missouri West, Evergy Missouri Metro and Liberty to answer a series of questions on RTO membership benefits, costs, and appropriate time period for studying them. The PSC Staff provided a report summarizing the received comments and recommended that the Commission order Missouri electric companies to provide the 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, the PSC Staff filed its report. In its report, the PSC 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 responded to the PSC Staff's recommendation on August 25, 2022.

Case Nos. AW-2020-0148 and AX-2023-0175

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. The PSC 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 being 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.

On December 1, 2022, the Commission closed **Case No. AW-2020-0148** and opened **Case No. AX-2023-0175**.

In **Case No. AX-2023-0175**, the Commission issued its finding of Necessity and Order Directing Proposed Rule to be filed for publication. On June 16, 2023, a Notice of Rulemaking Hearing was ordered by the Commission with the hearing scheduled for July 20, 2023.



Case No. GW-2022-0060

On September 1, 2021, the Commission opened a working docket to assist the PSC Staff in its review and consideration of the promulgation of a rule consistent with the then, newly passed legislation, which would allow natural gas operators to offer voluntary renewable natural gas programs.

On March 16, 2023, the Commission issued an order which called for a workshop on the subject to be held on June 13, 2023. At the workshop, presentations were made regarding the potential for voluntary renewable natural gas programs in Missouri.

ELECTRIC

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 \$47 million. 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. Evergy Missouri Metro stated the rate increase also sought to address customer interest in cleaner energy sources and offering more choices in electric rate options.

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

The Commission approved an agreement in this case with some issues reserved for hearing. The evidentiary hearing regarding the remaining issues was held from August 29 through September 9, 2022.

Under the Commission's December 8, 2022 decision, Evergy Missouri Metro will increase annual electric revenues by approximately \$25 million. The order included that the rate plan changes implementing time-of-use (TOU) rates would occur after October 2023 to allow Evergy Missouri Metro time to educate and prepare its residential customers.

On December 30, 2022, the Commission approved the tariffs implementing new rates to become effective on and after January 9, 2023.

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 \$59.8 million. 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. Evergy Missouri West stated the rate increase also sought to address customer interest in cleaner energy sources and offering more choices in electric rate options.

The Staff, OPC and other intervening parties filed their recommendations with the Commission regarding Evergy Missouri West's rate increase request on June 8, 2022.

The Commission approved an agreement in this case with some issues reserved for hearing. The evidentiary hearing regarding the remaining issues was held from August 29 through September 9, 2022.

Under the Commission's December 8, 2022 decision, Evergy Missouri West will increase annual electric revenues by approximately \$30 million. The order included that the rate plan changes implementing TOU would occur after October 2023 to allow Evergy Missouri West time to educate and prepare its residential customers.

On December 30, 2022, the Commission approved the tariffs implementing new rates to become effective on and after January 9, 2023.

Ameren Missouri

(Case No. ER-2022-0337)

On August 1, 2022, Ameren Missouri filed an electric rate case with the Commission seeking to increase annual electric revenues by approximately \$316 million. According to Ameren Missouri, the main drivers of the requested rate increase are inclusion in rates of its recent investments in the Ameren Missouri system as part of its "Smart Energy Plan," increases in the cost of capital since the Company's last rate review, higher depreciation costs, and other changes in the cost of providing service to customers.

The Staff, OPC and other intervening parties filed their recommendations with the Commission regarding Ameren Missouri's rate increase request on January 10, 2023.

The Commission approved an agreement in this case with some non-revenue requirement issues reserved for hearing. Under the agreement, Ameren Missouri will increase annual electric revenues by approximately \$140 million.





REGULATORY ACTIVITY

Evidentiary hearings on the remaining issues were held April 12-14, 2023. The order establishing just and reasonable rates was issued to be effective on June 24, 2023.

On June 29, 2023, the Commission approved tariffs implementing new rates to become effective on and after July 9, 2023.

OTHER ELECTRIC ISSUES

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 an accounting order to authorize 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 accounting 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 concurrent securitization cases for the purposes of hearing, using the procedural schedule already established in **Case No. EO-2022-0040**.

The Staff and OPC responded to Liberty's petition on May 13, 2022 and evidentiary hearings were held on June 13 through June 16, 2022.

The Commission issued a financing order on August 28, 2022 and an amended financing order effective September 22, 2022. The orders authorize the financing of a total of approximately \$282 million related to Winter Storm Uri and in qualifying energy transition costs related to the Asbury Plant.

As part of its decision in the case, the Commission determined that Liberty's decision to retire the Asbury Power plant when it did near the beginning of 2020 was reasonable and prudent.

This case was the first securitization case decided by the Commission since a law was passed in the 2021 general legislative session. That law permits investor-owned utilities such as Liberty to securitize certain costs associated with natural disasters and the retirement of electric generating facilities. Generally, securitization takes existing debt of the investor-owned utility and turns it into customer-backed bonds which are sold in the financial markets.

Evergy Missouri West Winter Storm Uri Securitization

(Case No. EF-2022-0155)

On March 11, 2022, Evergy Missouri West filed a petition for an accounting order to authorize the financing of extraordinary costs that were 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 OPC responded to Evergy Missouri West's petition on June 30, 2022. Evidentiary hearings were held from August 1-5, 2022.

The Commission issued an amended financing order effective November 27, 2022. The order authorizes the financing of approximately \$307 million related to Winter Storm Uri.

Ameren Transmission Company of Illinois (ATXI)

(Case No. EA-2022-0099)

On December 21, 2021, Ameren Transmission Company of Illinois (ATXI) filed a CCN application seeking Commission authority to construct a new substation, associated area connections, and a 1.2 mile 161 kV (kilovolt) transmission line in, around, and between New Madrid and Sikeston, as well as, a CCN to operate an existing 28-mile 161 kV transmission line.

On July 7, 2022, the Commission approved an agreement granting ATXI a CCN for the project subject to conditions.

NextEra Energy Transmission Southwest, LLC (NEET Southwest) CCN

(Case No. EA-2022-0234)

On July 7, 2022, NextEra Energy Transmission Southwest, LLC (NEET Southwest) filed an application seeking a CCN to construct, install, own, operate, maintain, and otherwise control and manage a 345 kV transmission line and associated facilities in Barton and Jasper Counties, Missouri.

The Staff responded to the application on October 14, 2022. On December 8, 2022, the Commission approved an agreement granting NEET Southwest a CCN.





Collaborative Workshop for Customer Education and Outreach Regarding TOU Rates

(Case No. EW-2023-0199)

The Commission issued an order opening a working case to allow stakeholder collaboration with Evergy Missouri related to Evergy Missouri's time-of-use rate implementation plan on December 21, 2022. Evergy Missouri has filed a status report, presented at two workshops, and responded to questions. Staff and OPC have filed responses and requests for information.

Ameren Missouri CCN– Huck Finn Solar Project

(Case No. EA-2023-0244)

On July 7, 2022, Ameren Missouri filed an application seeking a CCN to construct, install, own, operate, maintain, and otherwise control and manage a 200 megawatt (MW) solar generation facility (Huck Finn Solar Project) in Audrain and Ralls County.

The Staff filed its recommendation on December 1, 2022. On February 8, 2023, the Commission issued an order approving an agreement to grant the requested CCN subject to conditions.

Ameren Missouri CCN- Boomtown Solar and Renewables Solutions Program

(Case No. EA-2022-0245)

On July 14, 2022, Ameren Missouri filed an application seeking a CCN to construct, install, own, operate, manage, maintain and otherwise control and manage a 150 megawatt solar generation facility located in White County, Illinois (Boomtown Solar Project). Ameren Missouri's request included the establishment of a new subscription-based renewable energy program for commercial, industrial and governmental customers called the Renewable Solutions Program.

The Staff, OPC, and other intervening parties filed responses in the case. Evidentiary hearings were held on February 6-7, 2023. The Commission issued an order granting the request, subject to conditions, on April 13, 2023.

Evergy Missouri West CCN – Wind Generation Facility in Oklahoma

(Case No. EA-2022-0328)

On August 8, 2022, Evergy Missouri West filed an application seeking a CCN to operate, maintain, manage and control an approximately 198 MW existing wind facility in Woodward, Ellis and Dewey counties in Oklahoma known as the Persimmon Creek Wind Farm.

The Staff, OPC, and other intervening parties filed responses in the case. Evidentiary hearings were held on February 21-22, 2023 with the Commission issuing an



order granting the request, subject to conditions, on April 6, 2023.

Grain Belt Express, LLC Amendment to its CCN

(Case No. EA-2023-0017)

On August 24, 2022, Grain Belt Express, LLC filed an application to amend a CCN previously granted by the Commission in **Case No. EA-2016-0358**.

The proposed project includes (1) relocating the Missouri converter station to Monroe County and increasing the Missouri converter station size to 2,500 MW (2) relocating the AC connector line to Monroe, Audrain, and Callaway counties, and (3) constructing the project in two phases. The 40-mile AC connector line, as proposed in this CCN, is referred to as the Tiger Connector.

Staff and intervening parties filed responses to the application on April 19, 2023. The Commission held evidentiary hearings on June 5-8, 2023.

Ameren Missouri CCN – Burns Switchyard

(Case No. EA-2023-0226)

On January 13, 2023, Ameren Missouri filed an application seeking a CCN to construct, install, own, operate, maintain and otherwise control a 345 kV switchyard and associated facilities in Callaway County known as the Burns Switchyard. The proposed project facilitates the interconnection request of Show Me State Solar.

Staff filed its response to the application on May 1, 2023. The Commission issued an order granting Ameren Missouri a CCN, subject to conditions, effective July 28, 2023.



REGULATORY ACTIVITY

Repository of Utility Actions Related to Securing Funding from the Infrastructure Investment and Jobs Act of 2021 and the Inflation Reduction Act of 2022

(Case No. AW-2023-0156)

On November 30, 2022, the Commission opened a working case to consider utility actions related to securing funding from the Infrastructure Investment and Jobs Act of 2021 (IIJA) and the Inflation Reduction Act of 2022 (IRA).

On April 21, 2023, a workshop meeting was held with participation from state, federal, academic, community and business stakeholders. Investor-owned utilities also presented their efforts regarding the IIJA and IRA at the workshop.

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 the PSC Staff no less frequently than at 18-month intervals.

In fiscal year 2023, Staff completed prudence reviews of fuel and purchased power costs and revenues included in the FACs of Liberty (Case No. EO-2023-0087) and Ameren Missouri (Case No. EO-2022-0236).

Also in fiscal year 2023, Staff initiated prudence reviews of fuel and purchased power costs and revenues included in the FACs of Evergy Missouri Metro (Case No. EO-2023-0276) and Evergy Missouri West (Case No. EO-2023-0277). These prudence reviews have a Staff Recommendation due on August 30, 2023.

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 or Ameren Missouri. On September 14, 2022, the Commission filed an **Order Approving Staff's Prudence Review** for Ameren Missouri's Ninth Prudence Review.

In fiscal year 2022, Staff completed prudence reviews of fuel and purchased power costs and revenues included in the FACs of Evergy Missouri Metro (Case No. EO-2022-0064) and Evergy Missouri West (Case

No. EO-2022-0065). 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, Evergy Missouri Metro, Evergy Missouri West and Staff filed a non-unanimous stipulation and agreement settling the issue. On September 14, 2022, the Commission approved the stipulation and agreement. The order reiterates that the Company agrees, with no admission of imprudence, to settle the case for a one-time FAC adjustment in the next FAC filing of \$703,825.30 for Evergy Missouri Metro and \$48,796.34 for Evergy Missouri West.

In the Liberty prudence review case, OPC filed a response to Staff's Report requesting the Commission direct Staff to amend its Report and provide the Commission with a thorough prudency review analysis of the Neosho Ridge outage incident and its full impact on customers during the review period.

Staff responded to OPC stating that based on all the information Staff knew prior to when Staff's prudence review was filed in February 2023, and the additional information provided by Liberty since, Staff's opinion based on what it has reviewed so far is that currently Staff has nothing on which to base an allegation of imprudence by Liberty for the Neosho outage.

OPC filed a subsequent response requesting the Commission direct Staff to update its Report following a full review of all root cause analyses of the Neosho Ridge outage, or in the alternative, hold an evidentiary hearing to address the issue. At the end of the fiscal year, this case was still pending.

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 20 CSR 4240-22.080(1) or 20 CSR 4240-22.080(3), respectively.

Ameren Missouri made its annual update filing on September 30, 2022, and filed a corrected annual update on October 3, 2022 (Case No. EO-2023-0121). 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. No other party filed comments in response to Ameren Missouri's annual update. The Commission is not required to take further action for annual updates and therefore, did not issue a response or an Order in this case.

Evergy Missouri Metro and Evergy Missouri West made annual update filings on June 15, 2023 (**Case Nos. EO-2023-0212 and EO-2023-0213**, respectively). On July 26, 2023, Council for the New Energy Economics filed a Motion for an extension of time to file comments, requesting comments be due on August 31, 2023.

Liberty made its annual update filing on March 29, 2023 (**Case No. EO-2023-0294**). No parties to the case, including Staff, filed any comments in response to Liberty's annual update.

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 margin revenues due to the programs, and 3) an earnings opportunity based on evaluated, measured, and verified (EM&V) energy and demand savings.

On July 27, 2022, the Commission approved a stipulation and agreement which granted a \$2.5 million increase to Ameren Missouri's MEEIA 2019-2021 Plan Residential Heating and Cooling Program budget.

On August 3, 2022, the Commission issued an Order accepting the EM&V program year 2021 report for Ameren Missouri.

On October 12, 2022, the Commission approved the Revised Technical Resource Manual (TRM) and Deemed Savings Table, which corrected Appendix H and I of the TRM for Ameren Missouri.

On March 29, 2023, the Commission approved an Amended Agreement regarding implementation of certain MEEIA programs through plan year 2023. The Amended Agreement states the Signatories agree that Ameren Missouri should be allowed to extend the maximum number of demand side events it can call from 10 to 15.

On September 14, 2022, the Commission approved tariff revisions Evergy Missouri West and Evergy Missouri Metro filed on September 9, 2022, which extended the Pay As You Save® pilot program to December 31, 2022.

On December 14, 2022, the Commission issued an Order approving a stipulation and agreement regarding EM&V for Evergy Missouri West and Evergy Missouri Metro.

On December 21, 2022, the Commission approved Evergy's Modified TRM, which incorporated EM&V results from Program Year 1 of MEEIA Cycle 3.

On March 1, 2023, the Commission granted an extension of time to file the Program Year 3 EM&V Report for Evergy Missouri West and Evergy Missouri Metro.

On November 21, 2022, the Commission approved an agreement in **Case No. EO-2022-0078** which authorized Liberty to extend its MEEIA Cycle 1 for one year, through December 31, 2023, under the conditions set forth in the agreement.

Commission rules require that a prudence review of 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 2023, Staff completed its second MEEIA prudence review of Cycle 3 energy efficiency programs and Cycle 2 long-lead projects of Ameren Missouri (**Case No. EO-2023-0180**). 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.

Also in fiscal year 2023, Staff initiated its second MEEIA prudence review of Cycle 3 energy efficiency programs of Evergy Missouri Metro (**Case No. EO-2023-0407**) and Evergy Missouri West (**Case No. EO-2023-0408**). These prudence reviews have a Staff Recommendation due on October 27, 2023.

As a result of its fiscal year 2023 DSIM prudence review, Staff found no evidence of imprudence by the decision-makers of Ameren Missouri. On May 18, 2023, the Commission issued an Order approving Staff's prudence review report.

NATURAL GAS

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.

On November 30, 2022, the Commission approved a Stipulation and Agreement authorizing an increase in Spire Missouri's total revenue requirement of approximately \$78



REGULATORY ACTIVITY

million. On December 14, 2022, the Commission approved tariffs implementing the new rates to become effective on and after December 26, 2022.



Empire District Gas Company

(Case No. GA-2023-0110)

On September 21, 2022, The Empire District Gas Company d/b/a Liberty (EDG) filed an application for a CCN to construct, install, own, operate, maintain, control and manage a natural gas distribution system to provide gas service in Platte County, Missouri as a further expansion of its existing certified area. The requested CCN would allow EDG to serve a new development known as Logistics Park in Platte County

On January 25, 2023, the Commission issued an order granting a CCN subject to some conditions that include, inter alia, requiring EDG to file an updated tariff sheet incorporating the requested Sections for Platte County, reserving all ratemaking determinations regarding the revenue requirement impact of this service area extension request until Liberty's next general ratemaking proceeding and requiring EDG to provide an updated list of customers to be referenced for this application.

On June 1, 2023, the Commission issued an amended order in this case, approving an agreement reached between the Staff, Spire Missouri and EDG regarding the certificated area.

Spire Missouri

(Case No. GA-2023-0038)

On August 5, 2022, Spire Missouri filed an application seeking a CCN to construct, install, own, operate, maintain, and otherwise control and manage a natural gas distribution system in order to provide natural gas service in and around the City of Oronogo, Missouri in Jasper County. This would be a further expansion of Spire Missouri's existing certified area.

On January 25, 2023, the Commission issued an order granting a CCN subject to some conditions that include all ratemaking determinations shall be reserved for consideration in Spire Missouri's next general ratemaking proceeding.

PROCUREMENT ANALYSIS

Natural Gas ACA Activities

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

The Procurement Analysis Department conducts an annual Actual Cost Adjustment (ACA) review for each natural gas local distribution company after the LDCs close out their records following the end of each ACA period. A primary purpose of the ACA process is to reconcile the company's actual gas costs with what it charged customers (its billed revenues). In its purchased gas adjustment (PGA) filings, the company estimates its gas costs for the upcoming year. In the ACA, the estimate is reconciled with the actual prudently incurred cost of gas. In this function, the Procurement Analysis Department reviews the LDC's true-up of gas costs for the period under review. A comparison of billed revenue recovery with actual gas costs will normally yield either an over-recovery or under-recovery of the ACA balances to be either returned to customers or charged to customers, respectively.

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

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

Certain impacts from cold weather events continued to have impacts on LDC gas cost recovery balances including issues regarding the level of carrying costs associated with these balances.

The Procurement Analysis Department continued to review ACA impacts resulting 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, renewable natural gas issues, 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 and engineering 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 2022 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 three master meter systems.

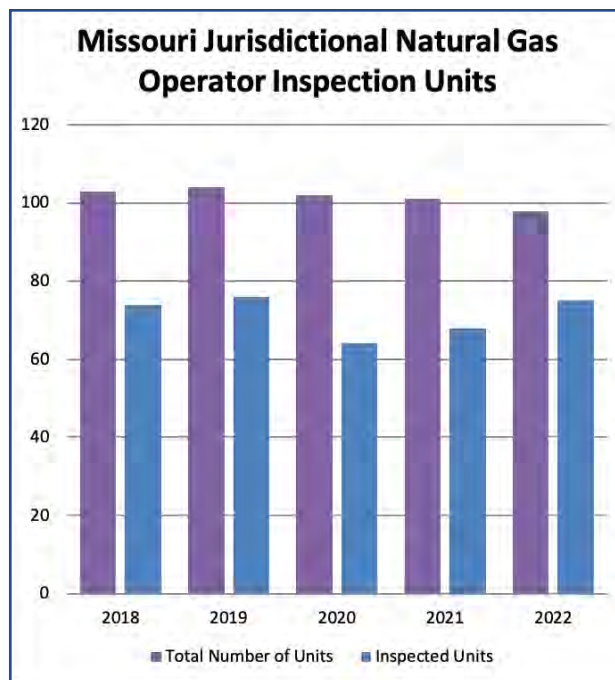
In 2022, there were a total of 58 natural and renewable gas pipeline operators over which the Commission had safety jurisdiction, operating approximately 1,000 miles of intrastate natural gas transmission pipelines, over 28,000 miles of distribution main pipelines, and over 1.5 million natural gas service lines.

The 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 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 2022 calendar year, PSC Safety Engineering Department Staff conducted over 200 individual inspections, including comprehensive records and field, compliance follow-up, construction, operator qualification, control room management, transmission and distribution integrity management, anti-drug and alcohol misuse programs, and incident investigations. As required by the federal *Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020* (2020 Pipes Act), Safety Engineering Department Staff conducted inspections to confirm that natural gas operators under Commission jurisdiction had taken actions required to comply with Section 114 of the 2020 Pipes Act.



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.





REGULATORY ACTIVITY

FEDERAL NATURAL GAS AND ELECTRIC CASES

The Missouri Public Service Commission (MoPSC) actively participates in proceedings at the Federal Energy Regulatory Commission (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 monitors approximately 65 FERC cases on a daily basis. These cases are filed from many different regions of the country and include issues that may affect Missouri consumers in the future.

The MoPSC filed its notice of intervention (NOI) in 26 FERC cases during the fiscal year ending June 30, 2023. 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.

FEDERAL NATURAL GAS ACTIVITIES

FERC regulates interstate natural gas pipeline companies, and its regulatory decisions can 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 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.

Four 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), Enable Mississippi River Transmission Corporation, LLC (MRT) and Spire STL Pipeline, LLC (STL Pipeline). 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. STL Pipeline serves the St. Louis area and parts of Illinois. In addition, Natural Gas Pipeline Company of America, Ozark Gas Transmission, LLC and Texas Eastern Transmission, LP serve southeastern Missouri; Tallgrass Interstate Gas Transmission, LLC and KPC Pipeline, LLC serve the Kansas City area; ANR Pipeline Company serves northern Missouri; and MoGas Pipeline LLC serves areas from St. Louis to Rolla. Rockies Express Pipeline LLC also crosses Missouri.

Spire STL Pipeline, LLC (STL Pipeline) (FERC Docket No. CP17-40)

Spire STL Pipeline, LLC 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. STL Pipeline entered into a precedent agreement with its affiliate LDC, Spire Missouri, for firm transportation capacity to serve Spire Missouri's natural gas 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. The MoPSC urged FERC to respect traditional state jurisdictional decision-making authority, and raised concerns regarding Spire STL Pipeline's requested return on equity (ROE), capital



structure, and the potential shifting of the project's financial risk 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 fall within the jurisdiction of the MoPSC.

The majority of the pipeline is 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 portions of the pipeline located 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. In May 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 of FERC's CCN Order in the U.S. Court of Appeals for the District of Columbia Circuit. On June 22, 2021, the Court of Appeals vacated the CCN 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 decided 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 issued a final order on remand.

Over a year later, on December 15, 2022, FERC issued a permanent certificate. In compliance with the December 15 CCN order, Spire STL Pipeline continues to file with FERC weekly status reports regarding its ongoing work with landowners to resolve land restoration issues, and to respond to various directives from FERC on landowner issues. The MoPSC continues to monitor the case.

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.

Upon filing its rate case, Panhandle requested FERC terminate its investigation in **RP19-78**. FERC denied Panhandle's request, and consolidated the rate case with the investigation. Panhandle filed a petition for review with the U.S. Court of Appeals for the District of Columbia Circuit challenging FERC's denial of its request to terminate the investigation (**D.C. Circuit No. 20-1419**). The Court ordered the case held in abeyance pending completion of FERC's hearing procedures and issuance of a final order.

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 (ADIT), 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



REGULATORY ACTIVITY

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. On December 16, 2022, FERC issued **Opinion No. 885** and order on initial decision. In the order, FERC agreed with the initial decision 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. The order also reduced Panhandle's ROE from the 11.43% recommended in the initial decision to 11.25%. FERC reversed the initial decision related to excess deferred income taxes (EDIT) and ADIT as well.

Panhandle requested rehearing on numerous issues, and the Michigan Public Service Commission requested rehearing regarding FERC's finding that Panhandle appropriately eliminated its ADIT balance from its rate base when the pipeline restructured and became owned by a Master Limited Partnership (MLP). Petitions for review have been filed by both Panhandle (**D.C. Circuit No. 23-1080**) and the Michigan PSC (**D.C. Circuit No. 23-1116**). The MoPSC has intervened in the appeals. All three petitions for review have been consolidated by the Court and held in abeyance until FERC issues a final order on the rehearing issues.

On February 14, 2023, Panhandle filed tariffs in compliance with the order, which were accepted by FERC on May 26, 2023. Panhandle sought rehearing of FERC's compliance order. The MoPSC will continue to monitor this case and the pending appeals.

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 in FERC Docket No. **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 two years. These costs included a requested self-insurance reserve adjustment of approximately \$22.8 million. Overall, the filing represented an estimated 40% rate increase 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.

After preliminary negotiations, on June 14, 2022, the FERC Chief ALJ extended the procedural schedule to allow further negotiation. The active parties engaged in extensive settlement negotiations, including 12 settlement conferences. On July 7, 2022, they reached a settlement in principle. Final settlement documents were filed on September 9, 2022, and approved by FERC on November 30, 2022.

The settlement resulted in rates significantly below the requested rates, saving Missouri customers approximately \$1.4 million a year. Parties agreed to depreciation and negative salvage rates, the continued amortization of excess deferred income taxes and deficient deferred income taxes, and a 13.50% ROE applied to expansion projects.

In addition, the settlement requires Texas Eastern to track certain reliability metrics and prepare annual reports regarding maintenance, integrity management and reliability. Texas Eastern will conduct an annual meeting with customers to discuss its maintenance, integrity management and reliability program objectives. The pipeline will also prepare an annual report describing the pipeline's greenhouse gas emissions data and mitigation strategies.

Finally, the settlement requires Texas Eastern to provide, in its future rate case filing, materials related to contract discounts and a fully functional cost allocation and rate design model.

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 requested a modernization tracker to recover the cost of additional upgrades it planned to make in future years. Based on a preliminary analysis, the requested increase would have resulted 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 intervened on March 3, 2022. Motion rates were put into effect on August 1, 2022. The parties held several settlement conferences and reached a settlement in mid-November 2022. ANR filed a stipulation and agreement at FERC on November 29, 2022, and the settlement was approved by FERC on April 11, 2023.

The settlement divided ANR's rate increase into two periods. Period One rates reflect an increase of 13% over pre-filed transmission reservation rates and a 3.6% weighted average increase to storage reservation rates.



Period One rates took effect as of August 1, 2022. Period Two rates will take effect when ANR places two new compressor station replacement units into service, but no earlier than August 1, 2024. Period Two rates will reflect an additional 2% increase in transmission rates and no additional increase in storage rates. The rate increase is slightly smaller for Missouri municipalities, which take service on ANR's Schedule STS for small customers. The STS increase is about 12% in Period One and an additional 1% in Period Two. STS customers do not pay an additional charge for storage services. The settlement results in an annual savings of approximate \$5.8 million for Period One and \$5.7 million for Period Two versus ANR's requested rates.

Natural Gas Pipeline of America, LLC (NGPL)

(Pre-Filing Offer of Settlement)

NGPL is a natural gas pipeline that delivers gas to the Chicago area from the Texas Permian Basin and the Gulf of Mexico. The pipeline has a small presence in Missouri but serves Ameren Missouri, Liberty Utilities and several municipal gas utilities in Southeast Missouri.

NGPL's previous rate case in 2017 was a result of an investigation initiated by FERC pursuant to Section 5 of the Natural Gas Act (NGA) in Docket Nos. **RP17-303** and **RP17-913** (consolidated), and included a rate moratorium on Section 4 and Section 5 proceedings through July 1, 2022. The MoPSC filed a NOI in the consolidated docket, participated in the settlement conferences, and did not oppose the final uncontested settlement in the case.

The 2017 settlement included a two-phase 11% rate reduction, which includes a rate reduction of 4.5% beginning on November 1, 2017, and an additional reduction of 5.5% on November 1, 2018. NGPL also committed to spend \$400 million for pipeline modernization and integrity projects, agreed to file Fuel Transparency Reports, and agreed to submit a cost and revenue study on or before June 1, 2021. NGPL filed the cost and revenue study on June 1, 2021. There were no protests or comments filed on the cost and revenue study.

In the current rate case, NGPL initiated settlement negotiations with interested parties in the spring of 2021. On May 31, 2022, NGPL requested approval to amend the 2017 settlement to allow the rate moratorium to be extended from July 1, 2022, to September 29, 2022. NGPL stated that the extension would allow parties time to complete and submit a settlement to FERC. FERC granted the extension on June 30, 2022, and a unanimous stipulation and agreement was filed with FERC on September 19, 2022.

Because the MoPSC was a party to the 2017 settlement, it was automatically made a party to the current settlement. Similar to the 2017 settlement, the current settlement provides customers with a two-phase 9% overall reduction in NGPL's transportation and storage maximum reservation rates: a 5% reduction to be effective on November 1,

2022 and an additional 4% reduction to be effective on November 1, 2023. NGPL also committed to spend at least \$500 million on reliability, resiliency and green initiatives and pipeline integrity-related activities over the five-year period from January 1, 2023 through December 31, 2027. In addition, NGPL agreed to continue to file Fuel Transparency Reports and to file a new cost and revenue study on or before July 1, 2027. The settlement includes a rate moratorium until July 1, 2027.



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-



REGULATORY ACTIVITY

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 the 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 by the FERC ALJ on December 22, 2015, recommended a reduced ROE of 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 on 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 discounted cash flow (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**.

On August 9, 2022, the D.C. Circuit Court of Appeals issued an opinion, **MISO Transmission Owners v. FERC**, finding that FERC’s use of a “Risk Premium” model as one of the three models to determine a just and reasonable ROE for wholesale electric transmission rates was arbitrary and capricious. Thus, the court vacated the underlying orders (**Opinion Nos. 569-A** and **569-B**) and remanded for FERC to reopen the proceedings. The MoPSC continues to participate in these cases and does not expect a final resolution until the end of 2023 or later.

Wabash Valley Power Association, Inc. (FERC Docket No. ER23-255)

On October 26, 2022, Wabash Valley (Wabash) made a filing with FERC to amend its formula rate tariff. The filing would reset the cost of its combustion turbine in the demand rate, shorten the peak billing window, create a Super Off Peak Billing Window, add a fixed charge to recover stranded costs with certain approved stranded assets, and move certain RTO transmission related costs (Schedule 26A) billed to Wabash on an energy basis to energy costs instead of demand costs. Tipmont Rural Electric Membership Corporation (Tipmont) and Citizens Electric Corporation (Citizens) filed protests in the case. The Tipmont and Citizens protests raised similar issues, including the shifting of costs to members with larger loads.



The protests alleged that the costs to purchase power for members are aggregated and socialized, which causes large load members in MISO zones to subsidize other Wabash members because certain MISO zones have lower rates than other zones. The protests also raised issues related to Wabash's formula rate design, the lack of transparency, and an agreement that allows Wabash to change rates during a formula rate year.

The MoPSC filed an intervention in the case on February 6, 2023. Although the MoPSC does not regulate Citizens, the outcome of the case does have the potential to have an effect on the Missouri customers served by Citizens. Citizens currently serves customers in and around Perryville, Missouri and includes Proctor & Gamble, Mississippi Lime Company, Gilster-Mary Lee Corp., the Perryville and Ste. Genevieve Public Schools, and the Perry County Hospital.

FERC has established hearing and settlement procedures in the case, and the MoPSC continues to attend and participate in settlement negotiations.

Regional Electric Transmission Activity

The MoPSC regularly participates in and contributes to the stakeholder processes of the two Regional Transmission Organizations (RTOs) that operate in Missouri: MISO and SPP.

RTOs are organizations established under Title 16 USC §824 and are regulated by FERC, and its orders and rules. RTOs are charged with the duty of operating the interstate Bulk Electric Transmission Grid (the Grid), planning upgrades to, and expansions of the Grid, managing wholesale bulk electric markets through which utilities buy and sell electricity, conserving electric power, and ensuring 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), a part of the General Counsel Division, provides updates and briefings on RTO and FERC activities to Missouri Public Service Commissioners and spearheads the MoPSC's monitoring of and interactions with the RTOs to promote Missouri's interests.



Midcontinent Independent System Operator (MISO)

MISO serves Ameren Missouri, Columbia Water and Light, the Missouri Electric Commission (formerly Missouri Joint Municipal Electric Utility Commission) and several smaller municipalities and cooperatives, all 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 68,000 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, as of December 2022, managed energy transactions exceeding 651 million megawatt hours of energy, valued in excess of \$40 billion. MISO has dispatch control of more than 6,800 generating units representing in excess of 190 gigawatts of nameplate generating-capacity. MISO also coordinates inter-RTO grid management with other RTOs and non-RTO utilities such as the SPP, the Tennessee Valley Authority, the Southern Companies, and Associated Electric Cooperatives, Inc.

The MoPSC advocates for Missouri's interests within MISO by participation in MISO's stakeholder process, by providing informal comments to the various MISO working groups and more formally through the Organization of MISO States (OMS) as it provides comments to MISO and FERC. In January 2023, Commissioner Jason Holsman became the OMS representative for Missouri, replacing departing Chairman Ryan Silvey.

MISO Long Range Transmission Plan

MISO's 2019 Transmission Expansion Plan (MTEP) was expanded to include a Long Range Transmission Plan (LRTP) to bring renewable energy to market and serve load, enhance energy reliability and to provide economic energy transactions opportunities. The LRTP continues to be complex and forward looking, as it brings remotely sited renewable energy to more than 45 million energy customers within its territory over the next 40 years.



REGULATORY ACTIVITY

The LRTP is comprised of four Tranches (the first two of which contemplate projects in MISO's north and central regions, including Missouri). Cost estimates of Tranche 1 projects exceed \$10.8 billion and will add 2,000 miles of new high-voltage transmission. MISO estimates Tranche 1 benefits over the 40-year life of the respective projects to be between \$23.2 and \$52.2 billion. Missouri's share of Tranche 1 projects is estimated to be over \$1.8 billion and will provide 345 KV transmission from the Iowa line through north-central Missouri to the Mississippi River.

Tranche 2 remains under study but is contemplated to build 765 KV or 500 KV backbone transmission as well as more 345 KV transmission. Tranches 3 and 4 are intended to provide expanded transmission in MISO south and to connect MISO north and MISO south, respectively, and are still in the very early stages of study and cost allocations discussions.

Seams

MoPSC continued to both lead and monitor RTO seams issues in fiscal year 2022. MoPSC Commissioner Jason Holsman was the OMS Seams Liaison Commissioner for fiscal year 2022, spearheading OMS discussions on the topic. Much of the discussion in fiscal year 2022 was on the fifth and final recommendation from the joint SPP RSC – OMS Seams Liaison Committee on rate pancaking and unreserved usage charges. After multiple years of discussion, a whitepaper including potential solutions is expected to be developed by MISO and SPP staffs by the end of calendar year 2023.

Meetings attended by MoPSC BRTU members to monitor seams issues include: the SPP Seams Advisory Group; the MISO Seams Management Working Group; the joint MISO-SPP Common Seams Initiative; meetings of the SPP RSC – OMS Seams Liaison Committee; and any interregional planning meetings involving two of the three transmission planning regions within Missouri (MISO, SPP, and Associated Electric Cooperatives, Inc.).



Joint Targeted Interconnection Queue (JTIQ)

Fiscal year 2023 saw further developments on the Joint Transmission Interconnection Queue (JTIQ) project between SPP and MISO. JTIQ is intended to provide analysis and a cost allocation methodology for transmission projects intended to allow additional generators to connect to the power grid along the MISO-SPP seam. As of the end of fiscal year 2023, JTIQ included a project in the Kansas City, Missouri area.

In fiscal year 2023, parties worked to secure funding from the U.S. Department of Energy to pay for a portion of JTIQ projects, which are estimated to cost over \$1 billion. Both newly connecting generators and load in the footprints of MISO and SPP would pay using a formula that was agreed upon by stakeholders for the remainder of projects.

In fiscal year 2023, MISO and SPP stakeholders, including MoPSC, worked to finalize cost allocation methodology and tariff language for a future filing at FERC. This filing is expected to be made before the end of calendar year 2023.

Ambient Adjusted [Transmission Line] Ratings

Transmission facilities manufacturers specify the maximum amount of power their equipment can carry under specified conditions, and transmission owners/operators do not easily vary from those limits. However, the actual transmission line (Line) carrying capacity can vary dependent on, for example, temperature, season of the year, time of day, and wind conditions. If Line ratings are static, a Line can be considered congested which will compel the transmission operators to find alternate power to serve the connected load and increase the wholesale cost of that energy.

By allowing the Line ratings to be set and change with ambient weather conditions, Lines that may be considered congested under static ratings may be deemed less congested or not congested at all using Ambient Adjusted Line Ratings. Static ratings impact the wholesale price of energy and therefore the price retail ratepayers must pay. Ambient Adjusted Line Ratings allow operators to adjust the maximum power a line may carry and potentially save ratepayers money.

On December 16, 2021, FERC issued **Order 881** which required Transmission Providers (which includes RTOs such as MISO) to institute Ambient Adjusted [Transmission] Line Ratings (AARs) on all transmission lines impacted by temperatures and work on implementing this order is ongoing.

The MoPSC BRTU participated with MISO stakeholders as policies and procedures were developed to draft compliance MISO tariff language to submit to FERC, which would implement AARs. On June 15, 2023, FERC issued its order approving MISO's filing which is expected to take effect in July 2025.



Scarcity Pricing and Price Reform

Due to transmission line and generator outages arising from Hurricane Laura (August 2020), Winter Storm Uri (February 2021) and Winter Storm Elliott (December 2022) as well as other lesser-known storms, MISO stakeholders found some costs were socialized across large regions of the MISO footprint that should not have been. MISO stakeholders, including MoPSC BRTU, have been working on pricing reform proposals to better price energy under emergency and scarcity conditions. The current MISO efforts are focused on how to price energy under or after outage conditions and with the determination of the Value of Lost Load, which has been assigned, to the MISO Market Subcommittee.

Seasonal Resource Adequacy Construct

In June 2023, for the first time, MISO's Resource Adequacy Construct began operating a seasonal, as opposed to a yearly, capacity auction. The resource adequacy construct's purpose is to incent generator owners to participate in the MISO capacity auction. Formerly, the capacity auction was designed to meet the peak summer forecasted load hour for every hour of the year. As reliance on wind and solar grew and the risk of losing load grew with it, the assumption that the summer peak hour would be sufficient to guide capacity needs for every hour of the year needed further study. Consequently, MISO redesigned its capacity auction to operate on a seasonal basis with each season seeking to forecast its own peak hour for which the generators must meet load. The first such seasonal auction took place in June 2023 and set the capacity prices for MISO north:

- Summer 2023-\$10 per MW-day;
- Fall 2023-\$15 per MW-day;
- Winter 2023/2024-\$2 per MW-day; and,
- Spring 2024-\$10 per MW-day.

Last year's (2022/2023) single capacity price for MISO north was set at \$236.66 per MW-day and set the Planning Resource Margin Requirement at 135,300 MWs and Missouri's PRMR was set at slightly less than 8,275 MWs.

Historically the capacity auction prices tended to vary substantially, from a low of \$0.01 per MW-day in MISO south to \$257.53 per MW-day in MISO north. The hoped-for incentive to attract additional capacity did not materialize and given current prices, still may not attract additional capacity, but this remains to be seen.

Reliability Based Demand Curve

As MISO's resource fleet transitions toward renewable resources, the risk of losing load has changed. MISO views the risk on a seasonal basis rather than an annual basis and has begun studying how to value the demand for capacity. MISO's Independent Market Monitor recommended using a "downward-sloping" demand curve rather than the vertical demand curve it has relied on historically. This proposed downward-sloping demand curve, called

the Reliability Based Demand Curve, will have to value a number of generator attributes provided by thermal resources that are necessary for the reliable provision of energy but not necessarily provided by renewables. It is thought that with a Reliability Based Demand Curve these attributes will be recognized, priced and accordingly, that the MISO capacity market may then create incentives for resource owners to acquire means to provide those attributes. This discussion is proving controversial and the OMS, of which the Missouri Commission is a member, is taking a leading role in the development of what attributes are needed and how the Reliability Based Demand Curve will function. These discussions will continue into calendar year 2024. One of the largest concerns in establishing and using a Reliability Based Demand Curve is that the price such a market would set could possibly mean that capacity prices would not provide sufficient information on which to base a 40-year business decision, the life of a newly built generator. This and other related issues are still being studied.

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 Electric Commission (formerly 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 13 legacy-SPP states and is currently laying the groundwork for expanding into Colorado, Wyoming, and Utah. SPP is also establishing a market product intended to function in the western interconnect much as its day-ahead energy market does in the legacy SPP footprint. Currently, SPP exercises functional control in relation to:

- Over 949 generating plants representing over 105,000 megawatts of nameplate generating capacity which produced nearly 287,300 gigawatt hours of power in 2022;
- Over 72,000 miles of high-voltage transmission lines and facilities;
- Conducts ongoing transmission expansion and upgrades planning;
- Operates a day-ahead and real-time wholesale energy markets which settled \$59 billion of energy transactions in 2022;
- Coordinates local electric utilities and cooperatives activities;
- Conducts inter-RTO operations; and
- Manages federal utility compliance services with FERC for its 107 members.



REGULATORY ACTIVITY

SPP Regional State Committee (RSC) and the SPP RSC Cost Allocation Working Group

The SPP RSC is comprised of utility-regulatory commissioners from each SPP state. The RSC is unique among other RTO state committees in that SPP's bylaws confer upon it specific authority over cost allocation, financial transmission rights (congestion hedging), planning for remote resources and, most importantly, resource adequacy.

The RSC has been an active participant in the many special SPP taskforces such as the Synergistic Planning Project Team, Rate Impact Task Force, Regional Allocation Review Task Force, and Strategic Planning Committee Task Force on New Member Process, Interregional Cost Allocation Task Force, and Holistic Integrated Tariff Team. The RSC has one subordinate working group, the Cost Allocation Working Group (CAWG), on which the BRTU staff serves. The CAWG performs a research and monitoring roll for the RSC and performs other duties as needed by the RSC.

The MoPSC is represented on the RSC by Chairman Scott Rupp.

MoPSC BRTU CAWG representatives attend and participate in numerous SPP working groups including: Supply Adequacy Working Group, Regional Tariff Working Group, Improved Resource Availability Taskforce, Regional Allocation Review Taskforce, Seams Liaison Committee, and Seams Advisory Committee.

Safe Harbor for New Service Requests in SPP

CAWG initiated its review of the SPP "Safe Harbor" in fiscal year 2023. SPP's Safe Harbor represents a dollar amount of transmission upgrades used to provide service in response to a new transmission service request to connect a generator to the electric grid. 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, all or 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 2023, 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 (LSE'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.

Within CAWG's review, parties have suggested that the increase in the Planning Reserve Margin, to 15% (which occurred in 2022, see below for further details on this issue), has made the third 125% criterion less workable. Parties have suggested increasing the 125% to around 130% to allow for larger additions of capacity to qualify for the Safe Harbor mechanism.

Parties have also continued, as in previous years, to suggest changes to the second criterion involving wind resources. Potential changes include dropping the criterion entirely as well as possibly expanding it to include other variable resources such as solar.

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 2024.

Increase of the SPP Planning Reserve Margin (PRM) and the 2021 Loss of Load Expectations Study (LOLE)

A Reserve Margin is an amount of electrical generation that is held in reserve by a utility to be used for an unanticipated generator outage to maintain balance between electrical load and the utility's ability to satisfy that load.

A Planning Reserve Margin (PRM) is a statistically determined quantity of generation capacity deliberately held in reserve to satisfy unanticipated generator outages or increase in demand placed on an electric utility's system. A LOLE is a study used to determine the likelihood of a utility's failure to serve load due to a lack of generation.

In July 2022, the SPP staff re-studied the results of its most recent LOLE using actual, historical data (post Winter Storm Uri) rather than the forward-looking, statistical data it had used in its original study and determined that the SPP PRM, then at 12%, needed to be immediately increased to 15%. Stakeholders acknowledged the need to increase the PRM while opposing the immediate implementation of the increase. The SPP Regional State Committee and the SPP Board of Directors authorized the increase in the PRM in October 2022. In the most recent SPP studies of the PRM, all SPP load serving entities have been able to meet the increased PRM.

Winter Season Resource Adequacy Requirement

The SPP PRM is a requirement of the SPP tariff and applies to all seasons of the year. However, the PRM penalty only applies to the summer season and is imposed only when a LSE fails to satisfy the PRM in the summer. In the winter, the PRM was treated as an obligation but not a requirement. Given the results of the recently reviewed LOLE and subsequent analysis, the SPP staff raised



generator outage concerns when it proposed increasing the PRM. SPP staff also proposed treating the winter and summer seasons identically by making the PRM a winter-season requirement subject to penalty. Stakeholder-involved work started on this round of PRM requirements in July 2022 and involved utility staff, regulatory (state staff and RSC members) staff and SPP staff and management. The change in the winter PRM penalty is set to come before the SPP Board at its July 25, 2023 meeting.

SPP Consolidated Planning Process Taskforce

In fiscal year 2023, SPP continued its implementation of several SCRIPT initiatives (which were goals related to generator and transmission improvement issues), especially with the Consolidated Planning Process Task Force (CPPTF). The CPPTF has a goal of combining the planning of generator owner-benefiting and consumer-benefiting transmission projects into one simultaneous process. A member of the MoPSC BRTU was appointed to the task force to provide the Missouri and state regulator perspective.

The first step of the CPPTF was to provide education to its members on how the current separate transmission project planning processes worked. In 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. Discussion has focused on how a charge for generators would be set up. Work is expected to continue into at least the start of calendar year 2024.

Holistic Integrated Task Team (HITT) - M1

In fiscal year 2023, SPP stakeholders continued their work on the Holistic Integrated Task Team improvement (HITT M1). HITT M1, one of the market initiatives, concerned potential changes to a financial hedging instrument allowing parties to hedge the differences in price from where a generator was located to where the energy generated was consumed. CAWG and the SPP RSC handled this issue, as the financial hedging instrument that was under the SPP RSC's purview.

Seven of the nine subparts of M1 were supported by all of the states, but two of the subparts were not. Subpart 5 was about how excess auction revenues would be distributed to parties holding hedge instruments, with some stakeholders expressing concern that hedges created further in the past were receiving significantly more money than more recently created hedges. Subpart 1 was about how and whether to reset existing hedges, with some parties proposing to reset all of the hedges every 10 years or whenever a generator was retired.

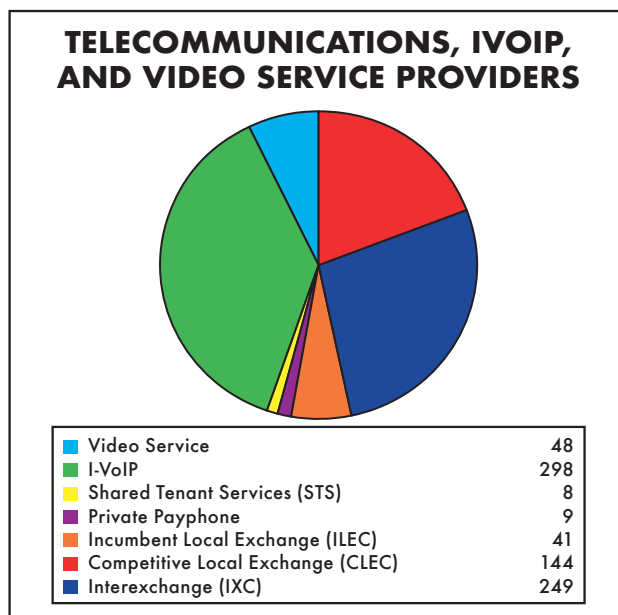
It is expected that at least M1 Subpart 1 and in all likelihood Subpart 2, would have further discussions in fiscal year 2024, and discussions on these issues are ongoing.

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 729 to 797. 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



REGULATORY ACTIVITY

numbering needs involving individualized company-specific situations. In the 2023 fiscal year, the MoPSC received four 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.

573 and 816 Area Code Relief

The 573 and 816 area codes are projected to run out of telephone numbers in the first quarter of 2024 and first quarter of 2025, respectively. Telephone number relief will be provided by simply assigning telephone numbers with a new area code in each area. Telephone numbers containing the 235 area code will be assigned in the 573 area while telephone numbers with a 975 area code will be assigned in the 816 area. Telephone numbering relief efforts should be completed in March 2024 for the 573 area. Relief efforts for the 816 area will be completed as early as August 2023. However, that is dependent upon when telephone numbers actually exhaust in the 816 area code, which is currently not projected until 2025.

314 Area Code Relief

Telephone relief efforts were completed in August 2022 for the 314 area code. The new area code 557 was introduced in August 2022.

AREA CODE	PROJECTED DATE OF TELEPHONE NUMBER EXHAUSTION*
314/557	Exhaust date exceeds 30 years
417	2nd quarter of 2030
573	3 rd quarter of 2024
636	Exhaust date exceeds 40 years
660	Exhaust date exceeds 20 years
816	1 st quarter of 2025

*Forecast as approved by the FCC in April 2023. 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, four companies applied for ETC status ultimately raising the number of Missouri companies with ETC status to 93 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, 65 companies received approximately \$140 million in federal high-cost support in 2022.

A significant portion of this funding is for broadband expansion. For example, \$110 million of the \$140 million in high-cost support provided in 2022 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 funding to expand broadband service to 326,353 targeted locations lacking adequate broadband service capability. As of the end of 2022, these companies expanded broadband service to 273,732 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.

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.



Any company receiving this funding for broadband expansion purposes must track and meet broadband deployment milestones to ensure broadband is being deployed in a timely manner, with the initial milestone of 40% of a company's obligation to be met by the end of 2024. As of the end of 2022, these companies expanded broadband service to 25,164 of these locations.

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.

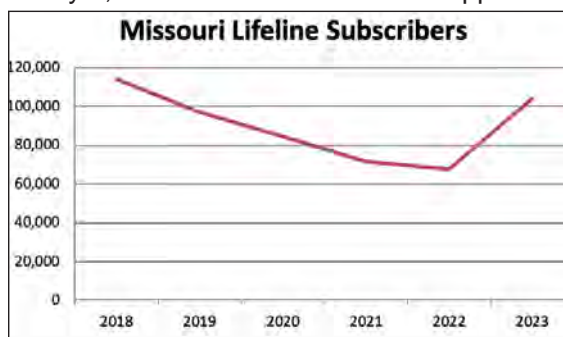
Lifeline Program

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, 2024. 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: MO HealthNet, the Supplemental Nutrition Assistance Program (SNAP), Supplemental Security Income, federal public housing, and Veterans and Survivors Pension Benefit program. Consumers with a household annual income at or below 135% of the federal poverty level are eligible for the Lifeline program.

As of June 2023, there were approximately 6.8 million Lifeline subscribers nationwide. Missouri has 103,959 Lifeline subscribers, which is an increase from the prior year of 66,778 Lifeline subscribers. Of these subscribers, approximately 2,860 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 per 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 260 subscribers were participating in the program in June 2023 versus approximately 315 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 335,932 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.



REGULATORY ACTIVITY

The Missouri USF fund balance has decreased from \$908,252 to \$492,405 during the July 2022 through June 2023 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 was 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 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. The Relay Missouri Fund balance has increased from \$913,719 to \$1,227,847 during the July 1, 2022 to June 2023 time period and will continue to increase due to decreased usage of services.

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 seven new interconnection agreements were filed with the MoPSC and 38 interconnection agreements were revised.

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 24 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, two small utility companies filed for a small company rate increase. A small water or sewer utility is a utility that serves fewer than 8,000 customers.

S.K. & M. Water and Sewer Company filed water and sewer rate cases on March 8, 2022 (**Case No. WR-2022-0240**), seeking to increase water and sewer revenues by approximately \$12,000. In an agreement approved by the Commission on September 28, 2022, S.K. & M. Water and Sewer Company reduced annual water and sewer revenues by approximately \$28,140.

On June 13, 2022, Argyle Estates Water Supply filed a water rate case (**Case No. WR-2022-0345**) with the Commission seeking to increase annual water revenues by approximately \$6,000. In an agreement approved by the Commission on January 4, 2023, Argyle Estates Water Supply was authorized to increase annual water revenues by approximately \$7,260.

In fiscal year 2023, a rate case was filed by The Raytown Water Company (**Case No. WR-2023-0344**) which sought to increase annual water revenues by approximately \$735,100. This case will be decided by the Commission during fiscal year 2024.



Large Rate Cases

On July 1, 2022, Missouri-American Water Company (MAWC) filed water and sewer rate cases with the Commission seeking to increase annual operating revenues by approximately \$99.6 million (**Case No. WR-2022-0303 consolidated with SR-2022-0304**). On May 3, 2023, the Commission approved an agreement authorizing MAWC a net increase in water and sewer revenues of approximately \$44.7 million.

On December 21, 2022, Confluence Rivers Utility Operating Company, Inc. (Confluence), filed water and sewer rate cases with the Commission seeking to increase annual sewer operating revenues by approximately \$1.9 million and annual water operating revenues by approximately \$1.3 million. (**Case No. WR-2023-0006 consolidated with SR-2023-0007**). These cases will be decided by the Commission during fiscal year 2024.

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 2023, 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 2023, a number of merger and acquisition cases were filed with the Commission.

On December 8, 2022, the Commission approved the merger of Seges Utility Company, LLC and 188 North Summit, LLC (**Case No. WM-2023-0065 consolidated with SM-2023-0066**). Under the merger, Seges Utility Company, LLC is the surviving entity.

On December 8, 2022, the Commission approved a request filed by Confluence to purchase the water system from Tan Tar A State Road, LLC (**Case No. WA-2023-0003**). Also on December 8, 2022, the Commission approved a Confluence request to purchase the water and sewer utility assets of Glenmeadows Water and Sewer LLC (**Case No. WA-2023-0026 consolidated with SA-2023-0027**).



On January 19, 2023, the Commission approved Confluence's request for a CCN to install, own, operate and maintain a water and sewer system from the Stone Ridge Meadows Home Owners Association, Inc. (**Case No. WA-2023-0092 consolidated with SA-2023-0093**). On March 22, 2023, the Commission approved Confluence's request to acquire the sewer assets of Oasis MHP LLC (**Case No. SA-2023-0187**).

On January 4, 2023, Confluence filed a request to acquire sewer assets from Kenneth Jaeger located near the Lost Valley subdivision in Ralls County (**Case No. SA-2023-0215**). On March 14, 2023, Confluence filed a request to acquire water and sewer assets from Four Seasons North MHP, LLC (**Case No. WA-2023-0284 consolidated with SA-2023-0285**). On May 24, 2023, Confluence filed a request to acquire water and sewer assets from Lincoln County Water and Sewer, LLC (**Case No. WA-2023-0398 consolidated with SA-2023-0396**). On June 23, 2023, Confluence filed a request to acquire sewer assets in and around the Village of Luray (**Case No. SA-2023-0437**). On June 30, 2023, Confluence filed a request to acquire



REGULATORY ACTIVITY

water and sewer assets from Brussels Valley Estates, Inc., Chevron/Sierra Land Company, LLC, and Mapaville Meadows (**Case No. WA-2023-0450 consolidated with SA-2023-0451**). These cases will be decided by the Commission in fiscal year 2024.

On January 11, 2023, the Commission approved MAWC's request to acquire water and sewer assets in or around the City of Smithton (**Case No. WA-2023-0071 consolidated with SA-2023-0072**). On June 7, 2023, the Commission approved a request filed by MAWC to acquire water and sewer assets from the City of Wood Heights (**Case No. WA-2023-0345 & SA-2023-0346**).

On June 22, 2023, MAWC filed an application to acquire water and sewer assets from the City of Ironton (**Case No. WA-2023-0434 & SA-2023-0435**). This case will be decided by the Commission in fiscal year 2024.

Miscellaneous Actions

In fiscal year 2023, a finance case was filed by Confluence and approved by the Commission (**Case No. WF-2023-0023 consolidated with SF-2023-0024**).

On June 13, 2023, Leon Travis Blevins d/b/a Misty Water Works filed an application for a certificate of convenience and necessity (**Case No. WA-2023-0418**). This case will be decided by the Commission in fiscal year 2024.

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 2023 fiscal year, the Program licensed 122 manufacturers, 232 retail dealers, and 88 installers. Field Staff conducted a total of 491 routine site 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 May of 2023, Program Staff attended the Missouri Manufactured Housing Association’s (MMHA) annual convention. Program Manager Justin Smith spoke during the conventions general session discussing industry relations, and recent changes to the Program. During the year, Program Staff worked with the MMHA to host multiple installer training sessions.

Manufactured Housing Program Celebrates 50 Years

This year marks the 50 year anniversary of the Public Service Commission’s Manufactured Housing and Modular Units Program. The Program has been a part of the Missouri Public Service Commission since 1973.

Today, the PSC’s Manufactured Housing and Modular Units Program regulates and licenses manufacturers and dealers who sell new and used manufactured homes and modular units, as well as installers who provide the initial set up of homes, thus allowing those entities to legally conduct business in Missouri.

STATISTICS FOR FISCAL YEAR 2023

Registered Manufacturers:	152
Registered Dealers:.....	222
Registered Installers:.....	96
Homes Sold (New & Used):.....	2,045
Consumer Complaints Received :	10
On-Site Inspections:	491
Dealer Lot Inspections:.....	14
Dealer Lot Investigations:	07
Modular Unit Seals Issued:	1,660
Modular Unit Plans Approved:.....	453
Installer Decals Issued:.....	1,495

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 2023 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 2023 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 2023 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):



REGULATORY ACTIVITY

- *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-2022-0337),*
- *In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's Request for Authority to Implement A General Rate Increase for Electric Service (Case No. ER-2022-0129),*
- *In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Request for Authority to Implement A General Rate Increase for Electric Service (Case No. ER-2022-0130),*
- *In the Matter of S.K. & M. Water and Sewer Company's Rate Increase Request (Case No. SR-2022-0239),*
- *In the Matter of an Investigation into the Operation and Condition of Liberty Utilities (Missouri Water), LLC d/b/a Liberty Utilities (Case No. WO-2022-0253),*
- *In the Matter of Missouri-American Water Company's Request for Authority to Implement General Rate Increase for Water and Sewer Service Provided in Missouri Service Areas (Case No. WR-2022-0303)*

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, call center indicators such as average speed of answer, abandoned call rate, calls handled by an interactive voice response system (IVR), the use of call back technology, 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 matters. Service quality is continuously reviewed with the companies to examine utility performance and customer service.

CONSUMER SERVICES DEPARTMENT

The Consumer Services Department (Consumer Services):

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



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

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

The Commission received over 6,500 customer-related contacts in fiscal year 2023. 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 2023 FISCAL YEAR

ELECTRIC

Date of Order	Case No.	Company	Rate Request	PSC Decision
12/08/22	ER-2022-0129	Evergy Missouri Metro	\$47.0 million	\$25.0 million
12/08/22	ER-2022-0130	Evergy Missouri West	\$59.8 million	\$30.0 million
06/14/23	ER-2022-0337	Ameren Missouri	\$316 million	\$140 million

NATURAL GAS

Date of Order	Case No.	Company	Rate Request	PSC Decision
11/30/22	GR-2022-0179	Spire Missouri	\$151.9 million	\$78.0 million

WATER AND SEWER

Date of Order	Case No.	Company	Rate Request	PSC Decision
09/28/22	SR-2022-0239	S. K. & M. Water & Sewer	\$12,000	(\$28,140)
01/04/23	WR-2022-0345	Argyle Estates Water Supply	\$ 6,000	\$7,260
05/03/23	WR-2022-0303	Missouri-American Water	\$99.6 million*	\$44.7 million*

*Does not include revenues already being collected from customers through the WSIRA.



REGULATORY ACTIVITY

ELECTRIC STATISTICS

Calendar Year 2022 (Missouri Jurisdictional)

Company Name	Operating Revenues	MWhs Sold	Residential Customers	Total Customers
Liberty (1)	\$ 575,869,437	4,376,595	63,177	161,477
Evergy Missouri Metro (2)	876,726,972	8,480,173	268,343	303,536
Evergy Missouri West (3)	861,154,519	8,666,707	294,351	340,298
Ameren Missouri (4)	<u>2,949,504,499</u>	<u>31,866,242</u>	<u>1,082,243</u>	<u>1,250,553</u>
Totals:	\$5,263,255,427	53,389,717	1,708,114	2,055,864

Source: MoPSC FERC Form 1, 2022 Annual Reports (Missouri Jurisdictional)

- (1) The Empire District Electric Company d/b/a
- (2) Formerly Kansas City Power & Light Company
- (3) Formerly KCPL-Greater Missouri Operations Company
- (4) Union Electric Company d/b/a

STEAM STATISTICS

Calendar Year 2022 (Missouri Jurisdictional)

Company Name	Operating Revenues	MMBtus Sold	Residential Customers	Total Customers
Evergy Missouri West (1)	\$ 20,946,326	2,538,148	0	5
Vicinity Energy Kansas City, Inc. (2) (3)	<u>25,939,095</u>	<u>1,825,895</u>	<u>0</u>	<u>46</u>
Totals:	\$ 46,885,421	4,364,043	0	51

Source: 2022 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 2022 (Missouri Jurisdictional)

Company Name	Operating Revenues	Mcfs Sold	Residential Customers	Total Customers
Liberty Utilities	\$ 67,602,617	8,369,485	45,583	52,461
Empire District Gas Co.	61,343,889	8,478,979	37,677	43,256
Spire Missouri East (1)	859,542,522	90,326,511	623,190	664,523
Spire Missouri West (2)	626,402,829	82,498,872	502,513	537,047
Summit Natural Gas Co. (3)	41,082,951	3,761,054	16,050	19,651
Ameren Missouri (4)	<u>188,609,779</u>	<u>20,892,567</u>	<u>121,501</u>	<u>135,404</u>
Totals:	\$1,844,584,587	214,327,468	1,346,514	1,452,342

Source: MoPSC FERC Form 2 2022 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 2023

COMPANY	WATER CUSTOMERS	SEWER CUSTOMERS
Confluence Rivers Utility Operating Co.	4,830	5,053
Holtgrewe Farms Water Company	40	0
Lake Northwoods Utility Company	12	7
Liberty Utilities	12,095	4,858
Lincoln Co. Sewer & Water**	224	202
Missouri-American Water	476,352	19,490
Seges Utility Company, LLC**	43	43
S.K&M. Water & Sewer	309	173
TOTALS	493,905	29,826

*Active Companies as of 06/30/23

** 2021 numbers—that is the latest Annual Report on file.

STAND ALONE WATER & SEWER COMPANIES*

Fiscal Year 2023

WATER COMPANY	CUSTOMERS	SEWER COMPANY	CUSTOMERS
Argyle Estates	53	Cannon Home Association	119
Environmental Utilities	22	Mid-Mo Sanitation	33
Gascony Water Company	208	North Oak Sewer District	83
Raytown Water Company	6,538	TBJ Sewer Systems, Inc.	79
Stockton Hills Water Company	140	Taneycomo Highlands	29
Village Greens Water Company	109	Timber Creek Sewer Company	2,401
Whiteside Hidden Acres, LLC	33	Seven Springs Sewer & Water	27
		United Services, Inc.	337
		Warren County Sewer Company	34
TOTALS	7,103	TOTALS	3,142

*Active Companies as of 06/30/23



REGULATORY ACTIVITY

July 1	Missouri-American Water Company (MAWC) files water and sewer rate cases with the Public Service Commission (Commission) seeking to increase water and sewer revenues by approximately \$99.6 million.	September 12	Missouri Public Service Commission supports National Lifeline Awareness Week.
July 7	Commission approves agreement granting Ameren Transmission Company of Illinois (ATXI) a certificate of convenience and necessity (CCN) to construct, own, operate and maintain certain transmission facilities in, around and between the cities of New Madrid and Sikeston.	September 14	Commission approves a request filed by Carl Richard Mills to transfer and assign his water system assets to Carriage Oaks Estates Water and Sewer Not-For-Profit.
July 16	The "988" three-digit abbreviated dialing code for the national suicide prevention and mental health crisis hotline goes into effect.	September 14	Commission grants Confluence Rivers Utility Operating Company, Inc. (Confluence Rivers) a CCN to install, own, acquire, operate and maintain a sewer system in Madison County. The CCN will allow Confluence Rivers to acquire the sewer assets of the Deer Run Estates Property Owner's Association.
July 21	Commission grants MAWC a CCN to install, own, operate and maintain a water and sewer system in Pettis County, in the Monsees Lake Estates Subdivision near Sedalia.	September 28	Commission approves an agreement in water and sewer rate cases filed by S.K.&M. Water and Sewer Company which reduces annual water operating revenues by approximately \$16,160 and annual sewer operating revenues by approximately \$11,980. When S.K.&M. filed its water and sewer rate cases with the Commission on March 8, 2022, it sought to increase annual sewer operating revenues by approximately \$8,000 and annual water operating revenues by approximately \$4,000.
July 21	Commission approves further suspension of the assessment that provides funding for the state Universal Service Fund. It has been suspended through December 31, 2022, followed by reinstatement of the assessment at a rate of .0015 effective January 1, 2023.	October 7	Commission issues financing order authorizing Evergy Missouri West, Inc. d/b/a Evergy Missouri West to issue securitized utility tariff bonds for qualified extraordinary costs incurred by Evergy Missouri West during Winter Storm Uri. The Commission issued an amended order on November 17, 2022.
July 27	Commission grants Timber Creek Sewer Company a CCN to install, own, operate and maintain a sewer system in Clay County, an expansion of its existing certificated area known as Johnson Ridge.	October 12	Commission grants MAWC a CCN to install, own, acquire, operate and maintain a water system in Benton County in a subdivision known as the Pom-Osa Heights Subdivision near Warsaw, Missouri.
August 1	Union Electric Company d/b/a Ameren Missouri files an electric rate case with the Commission seeking a net increase in its base electric rates of approximately \$316 million.	October 19	Commission approves request filed by United Way of Greater Kansas City, Inc. f/k/a The Heart of America United Way, Inc. to continue as an information and referral provider for purposes of 211 service.
August 11	Commission recognizes National 811 Day reminding consumers to call before you dig.	November 1	Commission Cold Weather Rule takes effect.
August 17	Commission approves the sale of the water system assets of Rex Deffenderfer Enterprises, Inc. d/b/a RDE Water Company to the City of Nixa.	November 21	Commission approves agreement extending Liberty's MEEIA Cycle 1 plan through December 31, 2023.
August 18	Commission issues financing order authorizing The Empire District Electric Company d/b/a Liberty to issue securitized utility tariff bonds for qualified extraordinary costs incurred during a February 2021 winter weather event (Winter Storm Uri) and recovery of energy transition costs associated with the retirement of Liberty's Asbury coal-fired generating plant.	November 30	Commission opens working case to consider utility actions related to securing funding from the Infrastructure Investment and Jobs Act of 2021 and the Inflation Reduction Act of 2022.
August 24	Commission approves Ameren Missouri request to transfer an undivided 49% interest in certain transmission facilities in, around and near Hannibal, Missouri to the Missouri Joint Municipal Electric Utility Commission.	November 30	Commission approves agreement which authorizes Spire Missouri, Inc. (Spire Missouri) to increase annual natural gas revenues by approximately \$78 million above what was approved in Spire Missouri's last rate case. When Spire Missouri filed its natural gas rate request on April 1, 2022, it sought a net increase in its annual natural gas revenues of approximately \$151.9 million.
August 31	Commission grants MAWC a CCN to install, own, acquire, operate and maintain water and sewer systems in Jasper County. The CCN will allow MAWC to acquire the water and sewer assets of the City of Purcell.		



December 8	Commission approves a joint application which authorizes 188 North Summit, LLC to transfer ownership of its water and sewer systems to Seges Utility Company, LLC. Seges Utility Company, LLC has also been granted a CCN to install, own, operate, control, manage and maintain a water and sewer system in the Seges Mobile Home Park in Callaway County near Holts Summit, Missouri.	January 11	Commission grants MAWC a CCN to install, own, operate and maintain water and sewer systems in Pettis County, in and around the City of Smithton.
December 8	Commission grants Confluence Rivers a CCN to install, own, acquire, operate and maintain water and sewer systems in Lincoln County. The CCN will allow Confluence Rivers to acquire the water and sewer assets of Glenmeadows Water and Sewer, LLC near Moscow Mills, Missouri.	January 11	Commission grants MAWC a CCN to install, own, operate and maintain water and sewer systems in and around the City of Stewartville in DeKalb and Clinton counties.
December 8	Commission approves an agreement which grants a CCN to NextEra Energy Transmission Southwest, LLC to construct, install, own, operate and maintain approximately nine miles of a 345 kV transmission line and associated facilities in Barton and Jasper counties.	January 19	Commission grants Confluence Rivers a CCN to install, own, acquire, operate and maintain a water and sewer system in St. Charles County. The CCN will allow Confluence Rivers to acquire the water and sewer assets of Stone Ridge Meadows Home Owners Association, Inc.
December 8	Commission issues amended Report and Order which authorizes Evergy Missouri Metro, Inc. d/b/a Evergy Missouri Metro an electric rate increase of approximately \$25 million and Evergy Missouri West an electric rate increase of approximately \$30 million. When rate cases were filed with the Commission on January 7, 2022, Evergy Missouri Metro sought a rate increase of approximately \$47 million and Evergy Missouri West sought an electric rate increase of approximately \$59.8 million.	January 25	Commission grants The Empire District Gas Company d/b/a Liberty a CCN to construct, own, operate and maintain a natural gas distribution system providing natural gas service in Platte County. The CCN will be a further expansion of Liberty's existing certificated area.
December 8	Commission grants Confluence Rivers a CCN to install, own, acquire, operate and maintain a water system in Camden County. The CCN authorizes Confluence Rivers to provide water service within the specified areas currently served by Tan Tar A State Road, LLC in Osage Beach.	January 25	Commission grants Spire Missouri a CCN to construct, own, operate and maintain a natural gas distribution system providing natural gas service in and around the City of Oronogo in Jasper County. The Commission also approved Spire Missouri's request to acquire the natural gas assets of the City of Oronogo.
December 21	Commission grants request filed by the Foxfire Utility Company to sell its water and sewer assets to the Ozark Clean Water Company.	January 25	Commission approves agreement reached in a territorial agreement between Ameren Missouri and Co-Mo Electric Cooperative which defines the service areas of each within a portion of Cooper, Cole and Moniteau counties.
December 21	Confluence Rivers files water and sewer rate cases with the Commission seeking to increase annual water revenues by approximately \$1.3 million and annual sewer revenues by approximately \$1.9 million.	February 1	Commission approves agreement reached in an electric territorial agreement between the City of Butler and Osage Valley Electric Cooperative which designates the boundaries of each electric service provider in portions of Bates County.
2023		February 8	Commission approves agreement granting Ameren Missouri a CCN to construct, own, operate and maintain a 200 megawatt (MW) solar generation facility (referred to as the Huck Finn Solar Project) in Audrain and Ralls counties.
January 6	Commission approves agreement authorizing Argyle Estates Water Supply to increase annual water operating revenues by approximately \$7,260. When the company filed its rate request on June 13, 2022, it sought to increase annual water operating revenues by approximately \$6,000.	March 16	Commission supports national "Fix-A-Leak Week".
		March 22	Commission grants Confluence Rivers a CCN to install, own, acquire, operate and maintain a sewer system in Cass County. The CCN authorizes Confluence Rivers to acquire the sewer assets of Oasis MHP LLC, a mobile home park in Cass County.



April 1	Commission recognizes April as National Safe Digging Month.	May 18	Commission approves an agreement between MAWC and the City of O'Fallon where MAWC would sell water to the City of Fallon and the City of O'Fallon would then resell the water to its citizens.
April 6	Commission grants Evergy Missouri West a CCN to acquire, own, operate, manage, maintain and control an existing and operational wind generation facility in Woodward, Ellis and Dewey counties in Oklahoma known as the Persimmon Creek Wind Farm.	June 7	Commission approves applications filed by MAWC to acquire and operate the assets of a municipal water and sewer system in Wood Heights, Missouri. The Commission also grants MAWC a CCN to install, own, operate, control, manage and maintain the water and sewer systems in and around Wood Heights, Missouri.
April 13	Commission approves request filed by United Way of Greater St. Louis, Inc. to continue as an information and referral provider for purposes of 211 service.	June 14	Commission approves agreement which authorizes Ameren Missouri to increase annual electric revenues by approximately \$140 million. When Ameren Missouri filed its rate request on August 1, 2022, it sought to increase annual electric revenues by approximately \$316 million.
April 13	Commission grants Ameren Missouri a CCN to construct, install, own, operate, manage, maintain and otherwise control and manage a 150 megawatt solar generation facility located in White County, Illinois (Boomtown Solar Project). The Commission also approves Ameren Missouri's request to establish a new subscription-based renewable energy program for commercial, industrial and governmental customers called the Renewable Solutions Program.	June 28	Commission grants Ameren Missouri a CCN to construct, own, operate and maintain a 345 kV switchyard and associated facilities in Callaway County known as the Burns Switchyard.
May 3	Commission approves agreements reached in water and sewer rate cases filed by MAWC. Under the agreements, MAWC is authorized to increase water and sewer revenues by approximately \$95 million. Of that amount, approximately \$50.3 million was previously authorized through a Water and Sewer Infrastructure Rate Adjustment (WSIRA) in prior proceedings and is already being collected from customers, resulting in a net revenue increase of approximately \$44.7 million. When MAWC filed its rate request on July 1, 2022, it sought a net increase in water and sewer revenues of approximately \$99.6 million in addition to what it was already collecting through its WSIRA.		

The Missouri Public Service Commission 1913 — 2023 110 Years of Service to the Citizens of Missouri

"A Public Service Commission is one of the necessities of the hour. The creation of such a commission is a progressive step which, in view of past experiences, every state must take," **Missouri Governor Elliott Major said** during his inaugural address delivered on January 13, 1913. That same year, Major would sign into law, a bill passed by the 47th General Assembly which created the Missouri Public Service Commission. The bill was sponsored by Carroll County Senator William Busby, who would later serve as Public Service Commission Chairman from 1916 until 1921.



ELLIOTT MAJOR
Governor of Missouri
Photo: Missouri State Archives

The Public Service Commission, which replaced the Board of Railroad and Warehouse Commissioners, began its work on April 15, 1913. The Board of Railroad and Warehouse Commissioners had been established in 1875 to regulate railroads operating in Missouri.

At the close of 1913, there were 877 corporations, municipalities and individuals engaged in serving the public in some capacity that, by operation of the Public Service Commission Law, placed them under the jurisdiction of the Commission. This included 425 telephone companies and 149 operating electrical corporations and municipalities.

From the 1913 Missouri Public Service Commission Annual Report:



WILLIAM BUSBY
PSC Chairman
1916 — 1921

- The PSC was given general supervision of all railroads, street railroads, express companies, all kinds of car companies, steamboat companies, companies operating upon the waters of this State and all other common carriers. Also given the general supervision of all gas corporations, electric corporations, water corporations and municipalities. The service, rates and charges, as well as such plants, are placed under the supervision and control of the Commission. All telegraph corporations and telephone corporations and all heating companies are placed under the supervision and jurisdiction of the Commission as well as all heating companies.
- Supervision of the issuance and approval of all stocks, bonds, notes and other evidence of indebtedness issued by such corporations and utilities were placed under the supervision and jurisdiction of the Commission.
- The Public Service Commission Law further provides that the Commission shall issue certificates of public convenience and necessity to all of said public corporations and utilities, except municipalities, when constructing a new road, plant or facility, as defined in said Law.
- One of the most important first duties was the organization of the Commission into proper departments for the performance of its duties, as provided under the Public Service Commission Law.
- The great variety of work involved requires scientific and technical knowledge, and the necessity that the Commission should be well and accurately served with the very ablest of experts in these matters made imperative the selection of assistants of skill, learning, practical experience and good judgment. With these qualifications of experts in view the Commission has carefully selected its officers and employees, after a most thorough and careful examination of the qualifications of each, and their experience obtained from actual operation in their special line of work and training.

The Missouri Public Service Commission 1913 — 2023 110 Years of Service to the Citizens of Missouri

• The plan of the Commission's organization and work, as finally adopted, was divided into eight departments (this plan of organization is somewhat of a combination of the so-called "New York" and "Wisconsin" plans).

- General Office —
- Legal —
- Rate —
- Engineering —
- Statistics and Accounts —
- Gas, Electric, Heat and Water —
- Telephone and Telegraph —
- Stocks and Bonds —

In 1913,
the Public Service Commission
consisted of eight departments:
- General Office -
- Legal -
- Rate -
- Engineering -
- Statistics and Accounts -
- Gas, Electric, Heat and Water -
- Telephone and Telegraph -
- Stocks and Bonds -

• The work of the Commission, both in volume and variety of subjects, very soon grew to such proportions as made it imperative that there be installed an elaborate and up-to-date filing system of more than the ordinary classification of record papers. The system being installed is known as the decimal system.

• The Commission held 127 sessions in its offices in Jefferson City and an additional 93 hearings on complaints held at various places in the State. It has been the policy of the Commission, as far as practicable, to hear the complaints at the place where they originated, in order that those who desire may attend without extra expense; also that witnesses may be given an opportunity to testify before the Commission without incurring the traveling expenses to a distant place of hearing.

Commission inspection of the railroads----The method of making these inspections was to have an inspection car pushed in front of the engine at an average speed of about 20 miles an hour, the inspection being made from the observation platform of the car. In cases where complaints had been made to the Commission on the condition of the track, or where it appeared to require closer inspection, the train was stopped and the inspection made on foot.

Accident Investigations---The policy of the Commission is to have one or more of the Commissioners, accompanied by their Expert Signal Engineer or Expert Railroad Engineer, as the report of the accident indicates to be necessary, reach the scene of the accident as quickly as possible and collect all evidence first hand, before important facts have been obliterated by the wrecking crew or in other manner. In order to accomplish this the Commission requires all serious accidents resulting in destruction of property or loss of life to be immediately reported by wire.

• All public service corporations seem to recognize that fair and just regulation by the State has come to stay and that such regulation is as much for their protection as for the protection of the public.

The Missouri Public Service Commission 1913 — 2023

110 Years of Service to the Citizens of Missouri

First case decided: *Case No. 2.* Submitted on April 16, 1913 and decided by the Commission on April 17, 1913. "In the matter of the Application of the Missouri, Kansas & Texas Railway Company for approval of a certain consolidated mortgage and for authorization of the issuance of bonds and authority to pledge said bonds as collateral security for the payment of a certain note.

First case filed: *Case No. 1.* Submitted on April 16, 1913 and decided by the Commission on April 25, 1913. "In the Matter of the Application of Joplin & Pittsburg Railway Company for an order approving an issue of refunding bonds.

In his first biennial message delivered to the General Assembly on January 6, 1915, Governor Elliott Major talked about the newly created Public Service Commission.

"The law creating this Commission is one of the most important acts of the Legislature in many years," said Governor Major. "A number of other states have since followed the example of Missouri, and have modeled and fashioned their legislation after the Missouri Act."

"While utility regulation has certainly changed over the past 110 years, the mission of the Missouri Public Service Commission has remained the same since the Commission heard its first case and rendered its first decision in 1913. The Commission continues to work to ensure that Missourians receive safe and adequate service at just and reasonable rates."

— Commission Chairman Scott Rupp





FIRST COMMISSIONERS



John M. Atkinson

John M. Atkinson, an attorney, was the first Chairman of the Missouri Public Service Commission. He was appointed by Governor Elliott W. Major on April 15, 1913 for a term of six years ending April 15, 1919.

Mr. Atkinson was from Doniphan, Missouri, and had formerly served as the Speaker of the House of Representatives and as an Assistant Attorney General.

Mr. Atkinson served until May 1, 1916, and was replaced by William G. Busby, a lawyer from Carrollton, Missouri, who was named Chairman of the Commission at the time of his appointment. Busby had sponsored legislation as a senator creating the Public Service Commission in 1913.

John Kennish

John Kennish, an attorney, from Kansas City, Missouri was appointed by Governor Major for a term of four years which ended April 15, 1917. Mr. Kennish was a former Missouri Supreme Court Judge and State Senator.

He left the Commission at the end of his term on April 15, 1917, but was appointed to fill the unexpired term of David E. Blair when Blair became a Missouri Supreme Court Judge on August 23, 1920. Kennish resigned December 1, 1920 and was replaced by John A. Kurtz, a Kansas City lawyer.



Howard B. Shaw

Howard B. Shaw, an electrical engineer, was appointed by Governor Major on April 15, 1913 for a four year term. At the time of his appointment, Mr. Shaw was Dean of the School of Engineering at the University of Missouri in Columbia.

Mr. Shaw was replaced by Edward Flad on April 15, 1917.

Frank A. Wightman

Frank A. Wightman was a member of the Board of Railroad and Warehouse Commissioners prior to his appointment to the Missouri Public Service Commission by Governor Major on April 15, 1913. The Board of Railroad and Warehouse Commissioners was abolished by the Public Service Commission Law.

Mr. Wightman was a railroad expert from Monett, Missouri, and served until April 24, 1915. He was replaced by Eugene McQuillin, a St. Louis attorney.



William F. Woerner

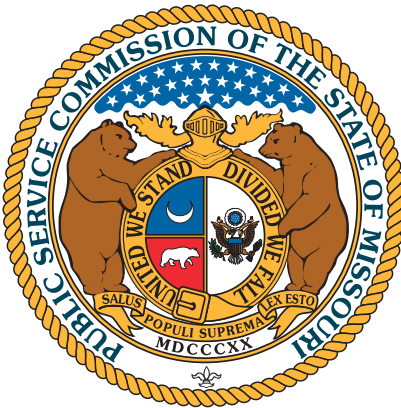
William F. Woerner was an attorney in St. Louis, Missouri when he was appointed to the Commission by Governor Major for a six year term ending April 15, 1919. Mr. Woerner's appointment came almost three months after the other four Commissioners had been appointed.

Mr. Woerner resigned effective November 18, 1914 and was replaced by Edwin J. Bean, a lawyer from DeSoto, Missouri.

COMMISSIONERS PAST & PRESENT



COMMISSIONER	LENGTH OF SERVICE	COMMISSIONER	LENGTH OF SERVICE
John M. Atkinson	1913-1916	William Barton	1956-1965
William F. Woerner	1913-1914	Frank J. Iuen	1959-1963
John Kennish	1913-1917; 1920	Frank W. May	1961-1967
Frank A. Wightman	1913-1915	Donal D. Guffey	1963-1968
Howard B. Shaw	1913-1917	William R. Clark	1965-1975
Edwin J. Bean	1914-1925	Charles J. Fain	1965-1977
Eugene McQuillin	1915-1917	Howard Elliot, Jr.	1967-1970
William G. Busby	1916-1921	Marvin E. Jones	1967-1973
David E. Blair	1917-1920	Willard D. Reine	1968-1975
Noah W. Simpson	1917-1923	James F. Mauze	1971-1975
Edward Flad	1917-1921	A. Robert Pierce, Jr.	1973-1977
John A. Kurtz	1920-1923	James P. Mulvaney	1975-1977
Hugh McIndoe	1921-1923	Stephen B. Jones	1975-1979
A.J. O'Reilly	1921-1925	Hugh A. Sprague	1975-1979
Richard H. Musser	1923-1925	Charles J. Fraas	1977-1983
Merrill E. Otis	1923-1924	Leah Brock McCartney	1977-1983
Thomas J. Brown	1923-1928	Alberta Slavin	1977-1981
D.E. Calfee	1925-1929	Stephanie Bryant	1979-1981
Almon Ing	1925-1933	Larry W. Dority	1979-1983
S.M. Hutchinson	1925-1931	John C. Shapleigh	1981-1984
J.H. Porter	1925-1933	Charlotte Musgrave	1981-1988
James P. Painter	1928-1929	Allan G. Mueller	1983-1996
Milton R. Stahl	1929-1933	Connie Hendren	1983-1989
J. Fred Hull	1929-1934	James M. Fischer	1984-1989
George H. English	1931-1936	William D. Steinmeier	1984-1992
J.C. Collet	1933-1935	David Rauch	1989-1993
William Stoeker	1933-1936	Kenneth McClure	1990-1997
W.M. Anderson	1933-1938	Ruby Letsch-Roderique	1990-1991
Harry E. McPherson	1934-1935	Patricia Perkins	1991-1995
Sam O. Hargus	1935-1937	Duncan Kincheloe	1992-1997
John S. Boyer	1935-1941	Harold Crumpton	1993-2000
Albert D. Nortoni	1936-1938	M. Dianne Drainer	1995-2001
John A. Ferguson	1936-1944	Karl Zobrist	1996-1997
J.D. James	1937-1942	Connie Murray	1997-2009
Marion S. Francis	1938-1941	Robert Schemenauer	1998-2001
Scott Wilson	1938-1941	Sheila Lumpe	1997-2003
Paul Van Osdol	1941-1943	Kelvin Simmons	2000-2003
Frederick Stueck	1941-1943	Bryan Forbis	2001-2003
Kyle Williams	1941-1952	Steve Gaw	2001-2007
Charles L. Henson	1942-1959	Robert Clayton III	2003-2011
Albert Miller	1943-1944	Linward "Lin" Appling	2004-2008
Agnes Mae Wilson	1943-1949	Jeff Davis	2004-2012
Richard Arens	1944-1945	Terry Jarrett	2007-2013
E.L. McClintock	1945-1967	Kevin Gunn	2008-2013
Morris E. Osburn	1945-1952	Robert S. Kenney	2009-2015
John P. Randolph	1949-1951	Stephen M. Stoll	2012-2017
Henry McKay Cary	1950-1955	Daniel Y. Hall	2013-2019
Maurice Covert	1952-1953	William P. Kenney	2013-2021
Tyre W. Burton	1952-1965	Ryan A. Silvey	2018-2023
Frank Collier	1953-1954	Scott T. Rupp	2014-present
M.J. McQueen	1954-1956	Maida J. Coleman	2015-present
D.D. McDonald	1955-1961	Jason R. Holsman	2020-present
		Glen Kolkmeier	2021-present
		Kayla Hahn	2023-present



Missouri Public Service Commission

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