MISSOURI
PUBLIC SERVICE COMMISSION

2018
ANNUAL REPORT

PSC COMMISSIONERS

Pictured left to right: Commissioner **William P. Kenney**; Commissioner **Daniel Y. Hall**; Chairman **Ryan A. Silvey**; Commissioner **Scott T. Rupp**; Commissioner **Maida J. Coleman**

Missouri Public Service Commission

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

October 24, 2018

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

Dear Governor Parson:

As Chairman of the Missouri Public Service Commission, it is my pleasure to submit the agency's Annual Report for the fiscal year July 1, 2017 through June 30, 2018, as well as additional information for the calendar year 2018. The Commission's work this year included the following:

- **Federal Tax Cuts and Jobs Act of 2017 (TCJA):** Passed and signed into law in December 2017, the TCJA reduces the federal corporate income tax rate from 35% to 21% for businesses, including utilities. Soon after it became law, the Commission established cases to investigate the impact of the TCJA on investor-owned Missouri utilities. The Commission's decisions in natural gas rate cases filed by Spire Missouri, Inc. and Liberty Utilities—as well as water and sewer rate cases filed by Missouri-American Water Company—reflected customer savings associated with the TCJA. A reduction in electricity rates for Ameren Missouri and The Empire District Electric Company was ordered by the Commission early in fiscal year 2019 and rate cases filed in January 2018 by Kansas City Power & Light Company (KCP&L) and KCP&L-Greater Missouri Operations Company (GMO) reflect savings associated with the TCJA. The Commission continues to review the TCJA as it relates to other regulated utilities.
- **Commission Rules:** The Commission continued to work on several rule changes in response to Executive Order 17-03, or developed new rules during the fiscal year. Some rules of interest include:
  - Certificates of Convenience and Necessity (CCN).
  - PSC Staff-assisted small utility rate cases.
  - Incentives for acquisition of nonviable utilities.
  - Creation of an environmental improvement fund.
- **Other important issues:** The Commission is currently exploring issues related to Distributed Energy Resources such as solar photovoltaic systems, wind, combined heat and power, energy storage, demand response, electric vehicles, micro grids, and energy efficiency. The Commission conducted several workshops with various stakeholders during the 2018 fiscal year on these topics.
- **Major Rate Cases:** The Commission reached decisions in natural gas rate cases filed by Spire Missouri, Inc. (Spire East-formerly Laclede Gas Company and Spire West-formerly Missouri Gas Energy). With over 1.2 million customers, Spire Missouri, Inc. is the largest natural gas utility regulated by the Commission.

The Commission also decided a rate case filed by Missouri-American Water Company (MAWC), the largest regulated water provider in Missouri. MAWC serves over 457,000 water customers. Electric rate cases filed by KCP&L and GMO during the 2018 fiscal year will be decided by the Commission by the end of 2018.

- **Merger Case:** The Commission approved agreements which authorized the merger between Great Plains Energy, Inc., KCP&L, GMO, and Westar Energy, Inc.
- **Wind/Solar:** The Commission approved a subscriber solar pilot program and a subscription-based renewable choice program for Ameren Missouri.
- **Legislation:** The Public Service Commission's Staff played an active role in utility-related legislation during the 2018 fiscal year by providing information and analysis on several bills including SB 564.
- **Cybersecurity:** The Commission continues to place high importance on physical and cyber security for those utilities under PSC jurisdiction. The Commission's Critical Infrastructure Security Engineer serves as a liaison between the Commission, utilities, and the Missouri Information Analysis Center, by reviewing and analyzing information related to known and perceived cybersecurity and physical security threats to Missouri's critical utility infrastructure.
- **Customer Experience Department:** The utility consumer of today has more service options than ever before. Utility companies in Missouri, as well as across the country, are continuing to place more emphasis on customer-focused utility service. In November 2017, the Commission created the Customer Experience Department to explore emerging issues involving the experiences and expectations of utility customers.
- **Consumer Services:** The Commission's Consumer Services Department responded to more than 8,500 customer-related contacts during the 2018 fiscal year and worked with consumers and utility companies to resolve various issues.
- **Consumer Outreach and Education:** In fiscal year 2018, the Commission conducted or participated in approximately 57 different consumer outreach activities. The Commission continues to meet with Missouri consumers and provide educational materials on a number of topics, including energy efficiency options that can lower monthly utility bills.
- **Local Public Hearings:** The Commission held local public hearings across the state to receive customer comments on contested cases. These hearings provide the Commission with an opportunity to educate consumers on the role of the Commission and to answer questions about the utility services they receive. The Commission held 33 local public hearings during the 2018 fiscal year.
- **Federal Activity:** The Commission continued to be a strong and active voice for Missouri ratepayers by monitoring and intervening in cases before the Federal Energy Regulatory Commission (FERC) and the Federal Communications Commission (FCC).
- **Open Proceedings:** Consumers can access the Commission's website and view, in real time, hearings in cases before the Commission or watch the Commission conduct business in its weekly Agenda meeting by accessing the website (**psc.mo.gov**). In addition, consumers can view all public information filed in cases through the Commission's Electronic Filing and Information System (EFIS).

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

Sincerely,

Ryan A. Silvey
Chairman

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CONTACTING THE PSC

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

Jefferson City: Missouri Public Service Commission

Governor Office Building
200 Madison Street
(Mailing Address: P.O. Box 360)
Jefferson City, MO 65102
Telephone No.: (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) 340-4700, Ext. 27
Fax: (314) 340-4758

Kansas City: Missouri Public Service Commission

Fletcher Daniels State Office Building
615 E. 13th Street, Room 201
Kansas City, MO 64106
Telephone No.: (816) 889-3944
Fax: (816) 889-3957

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

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

psc.mo.gov

BUDGET

	Fiscal Year 2019
Public Service Commission	
Public Service Commission-Personal Service	$10,958,307
Public Service Commission-Expense & Equipment	$2,536,462
Public Service Commission-Refunds	$10,000
Total	$13,504,769
Full-Time Employees (F.T.E.)	192.00
Office of Public Counsel-Personal Service	$905,585
Office of Public Counsel-Expense & Equipment	$265,609
Total	$1,171,194
Full-Time Employees (F.T.E.)	16.00
Deaf Relay Service and Equipment Distribution Program	
Expense & Equipment Appropriation	$2,495,808
Total	$2,495,808
Full-Time Employees (F.T.E.)	0.00
Manufactured Housing Department	
Personal Service	$361,548
Expense & Equipment	$354,466
Program Specific Distribution & Refunds(MH)	$20,000
MH-Refunds	$10,000
Subtotal	$746,014
Program Specific Distribution MH Consumer Recovery*	$192,000
Total	$938,014
Full-Time Employees (F.T.E.)	8.00
TOTAL BUDGET	**$18,109,785**
TOTAL FTE	**216.00**

*Consumer Recovery Fund Appropriation

COMMISSIONERS

Chairman Ryan A. Silvey

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

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

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

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

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

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

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

Commissioner William P. Kenney

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

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

Commissioner Kenney was drafted as a quarterback in the National Football League by the Miami Dolphins in 1978. He went on to play professional football for 11 years, 10 with the Kansas City Chiefs. Among his many accomplishments were becoming the National Football League's fourth quarterback to ever throw for 4,000 yards in a single season, Pro Bowl 1983 and Kansas City Chiefs Most Valuable Player in 1983.

Upon his retirement from football, Commissioner Kenney became a licensed real estate broker. He is president of Bill Kenney & Associates, a real estate brokerage and development company. He is also president of Bill Kenney Homes, a residential construction company.

Commissioner Kenney was elected to the Missouri Senate in 1994 and served the citizens of eastern Jackson County until 2002. In 2001, Commissioner Kenney was selected by Senate members to serve as the Majority Floor leader, the first Republican to hold this office in over 50 years.

In 1996, Commissioner Kenney was the Republican nominee for Lieutenant Governor. From January 2011 until accepting his current position, Commissioner Kenney was Chief of Staff for Missouri Lieutenant Governor Peter Kinder.

In August of 2013, Commissioner Kenney was appointed to the National Association of Regulatory Utility Commissioners (NARUC) Committee on Gas.

Commissioner Kenney is married to Sandra (Ehrlich) Kenney. They reside in Lee's Summit and have four adult children.

Commissioner Daniel Y. Hall

Commissioner Daniel Yves Hall was appointed to the Missouri Public Service Commission on September 27, 2013 by Governor Jay Nixon, and unanimously confirmed by the Missouri State Senate in January, 2014. He was appointed Chairman by Governor Nixon on August 10, 2015 and served as Chairman until September 2018. He is the 101st PSC Commissioner in the 100-year history of the PSC – Missouri's oldest state agency.

Commissioner Hall is an active member of the National Association of Regulatory Utility Commissioners (NARUC), serving as Co-Vice Chair of the NARUC Committee on Water, Vice-Chair of the Subcommittee on Education and Research, and member of the Washington Action Committee. He serves as Vice-President of the Organization of MISO States Board of Directors and Executive Committee and is a member of the MISO Advisory Committee. He is Chair of the Financial Research Institute's Advisory Board and a board member on the Public Council for the Water Research Foundation.

From January of 2009 when Governor Nixon was sworn into office until his appointment to the Commission, Hall served as the Legislative Director to the Governor, overseeing efforts to advance the Nixon Administration's legislative agenda and serving as lead liaison between the Governor and members of the Missouri General Assembly.

From 2003 to 2009, Hall served as Senior Counsel and Assistant Attorney General in the Office of Missouri Attorney General Jay Nixon. In this position, he litigated in state and federal courts, both trial and appellate, and provided counsel to the Attorney General concerning a wide range of topics including tobacco, sunshine law, education, elections, federal military base closure, and constitutional legislative procedures.

Between 2001 and 2003, Hall served in the Administration of Governor Bob Holden, first as Assistant Commissioner for Policy in the Office of Administration, then as a Senior Policy Adviser to the Governor. In these positions, Hall worked in policy development and legislation in the areas of transportation, natural resources, conservation, labor, agriculture, economic development and the annual state operating budget.

From 1998 to 2001, Hall served as Chief of Staff to Missouri House Speaker Steve Gaw. His responsibilities included coordinating the formulation and passage of the legislative agenda of the Speaker and House majority caucus, supervision of the Speaker's office staff and liaison with the Chief Clerk regarding House legal and personnel matters.

Prior to his state government service, between 1995 and 1998, Hall worked in private practice as an associate with Bryan Cave, LLP in Kansas City. His litigation practice included labor and employment, class action defense and commercial disputes.

From 1993 to 1995, Hall served as a Law Clerk to United States District Court Judge Dean Whipple. In this capacity, Hall conducted research and drafted opinions and orders in a broad range of civil and criminal cases, and provided counsel to the Judge concerning the court's management of state and local entities under its supervision.

Hall was awarded a Juris Doctorate from the University of Missouri School of Law in 1993. His law school honors include the Order of the Coif, Order of the Barristers and Board of Advocates. He was a member of the Law Review, serving as Note and Comment Editor. In 1988, Hall graduated cum laude with a Bachelor of Arts degree from Carleton College in Northfield, Minnesota, with a major in history and a minor in political economy.

Hall and his wife, Cindy, have three children – Elly, Kate and Keaton – and make their home in Columbia.

Commissioner Scott T. Rupp

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

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

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

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

Commissioner Maida J. Coleman

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 Chair of the National Association of Regulatory Utility Commissioners (NARUC) Committee on Consumers and the Public Interest. She also serves on NARUC's Board of Directors and on the Telecommunications and Supplier and Workforce Diversity Committees. Commissioner Coleman is a member of 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 and the Center for Public Utilities Advisory Council.

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.

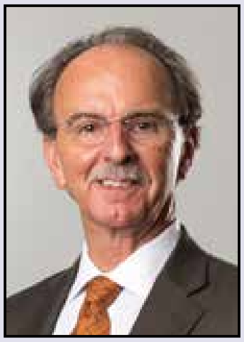
From 2001 until 2009, Commissioner Coleman served as a State Representative and State Senator from St. Louis, becoming the first African-American woman in state history to serve as Senate Minority Leader.

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.

Commissioner Stephen M. Stoll



Commissioner Stephen M. Stoll was appointed to the Public Service Commission by Missouri Governor Jay Nixon in December of 2011 and served on the Public Service Commission until January 3, 2018.

Commissioner Stoll was a member of the National Association of Regulatory Utility Commissioners (NARUC) where he served on the Committee on Electricity and the Subcommittee on Nuclear Issues – Waste Disposal. He also served as the Missouri Public Service Commission's representative on the Regional State Committee (RSC) for the Southwest Power Pool (SPP) and as the RSC president and chairman of the Regional Allocation Review Task Force (RARTF).

Stephen Stoll left the Commission on January 3, 2018, following the expiration of his six-year term.

PSC KEY PERSONNEL

COMMISSIONERS

Ryan A. Silvey, Chairman	751-4221
William P. Kenney, Commissioner	751-7508
Daniel Y. Hall, Commissioner	751-3243
Scott T. Rupp, Commissioner	751-0946
Maida J. Coleman, Commissioner	751-4132

ADMINISTRATION DIVISION

Loyd Wilson, Director	751-7435
Jamie Birch, Legislative Director	522-8708
John Hanauer, Manager-Information Services	522-2453
Kevin Kelly, Public Information Administrator	751-9300
Beth Oetting, Manager-Human Resources	751-5606
Debbie Quick, Public Information Coordinator	522-2760
Erica Ziegler, Manager-Consumer Services	751-3160
Consumer Services Toll-Free Hotline	1-800-392-4211
EFIS Toll-Free Help Desk	1-866-365-0924

GENERAL COUNSEL DIVISION

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

COMMISSION STAFF DIVISION

Natelle Dietrich, Director	751-7427
Jamie Myers, Deputy Director	526-6036
J Luebbert, Case Manager	522-8705
Dan Beck, Manager-Engineering Analysis Department	751-7522
Jim Busch, Manager-Water & Sewer Department	751-7529
Contessa King, Manager-Customer Experience Department	751-5239
Robin Kliethermes, Manager-Tariff/Rate Design Department	522-3782
Kathleen McNelis, Manager-Safety/Engineering Department	751-3456
David Murray, Manager-Financial Analysis Department	751-9160
Mark Oligschlaeger, Manager-Auditing Department	751-7443
John Rogers, Manager-Energy Resources Department	751-7524
Justin Smith, Manager-Manufactured Housing Department	526-2833
David Sommerer, Manager-Procurement Analysis Department	751-4356
Kevin Thompson, Chief Staff Counsel	751-6514
John Van Eschen, Manager-Telecommunications Department	751-5525
Manufactured Housing Toll-Free Hotline	1-800-819-3180

Area Code is 573 unless otherwise noted

THE ROLE OF THE PSC

JURISDICTION AND GOALS

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

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

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

COMMISSIONERS

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

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

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

COMMISSION

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

PSC STAFF

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

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

WEEKLY AGENDA MEETINGS

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

PSC ORGANIZATIONAL FUNCTIONS

LOYD WILSON
Director

ADMINISTRATION DIVISION

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

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

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

SHELLEY BRUEGGEMANN
General Counsel

GENERAL COUNSEL DIVISION

The General Counsel is authorized by statute to represent the Commission in all actions and proceedings, whether arising under the Public Service Commission Law or otherwise. Attorneys in the General Counsel's Office appear in state and federal trial and appellate courts on behalf of the Commission. When authorized by the Commission, the General Counsel seeks civil penalties from persons or companies that have violated the Public Service Commission Law or the Commission's regulations or orders. The External Litigation Department manages and processes these cases. The General Counsel also provides legal advice to the Commission and each Commissioner as requested. The Regulatory Analysis Department, within the General Counsel's Division, represents the Commission's interests in various forums related to federal energy issues, including providing assistance in cases before the Federal Energy Regulatory Commission, along with providing analysis on policy issues facing the Commission.

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

MORRIS WOODRUFF
Secretary of the Commission /
Chief Regulatory Law Judge

SECRETARY OF THE COMMISSION / CHIEF REGULATORY LAW JUDGE

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

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

COMMISSION STAFF DIVISION

NATELLE DIETRICH
Staff Director

JAMIE MYERS
Deputy Staff Director

The Staff Director and Deputy Staff Director are responsible for leading all departments of the Commission's Staff. These positions supervise and coordinate a number of PSC Staff functions including rate cases, complaints, tariff filings, certificate applications, rulemakings and investigatory dockets.

The Commission Staff Division supports the Commission in meeting its statutory responsibilities by providing technical expertise in safety; utility rates, tariffs, rules and regulations; economic analysis; engineering oversight and investigations; and construction inspections. Commission Staff provide expertise in the areas of utility accounting, auditing, engineering, finance, management and natural gas procurement. Staff members perform audits, examinations, analyses and review the books and records of the regulated utilities providing service in Missouri. The Commission Staff Division is also responsible for investigating and responding to consumer complaints and making recommendations to the Commission regarding their resolution. The Commission Staff Division makes recommendations to the Commission in the form of expert testimony, formal recommendations and presentations.

Attorneys in the Staff Counsel's Department represent the PSC Staff in matters before the Commission. The Staff Counsel's Department also provides legal advice to the PSC Staff on matters before the Commission.

GENERAL ISSUES

The Federal Tax Cuts and Jobs Act of 2017

In December 2017, the Tax Cuts and Jobs Act (TCJA) was approved by both houses of the U.S. Congress and signed into law by President Trump. The legislation reduced the federal corporate income tax rate from 35% to 21% for businesses, including utilities. Another provision of the TCJA that specifically applies to the utility industry requires utilities to pass back to customers in rates over time "excess deferred taxes." Excess deferred taxes are amounts pre-collected by utilities from customers in rates for later payment to federal taxing authorities, but with the passage of the TCJA will now be paid to the federal government at a lower tax rate than what was assumed when the deferred taxes were included in rates.

In January 2018, the Commission opened a working case to investigate the effect of the federal tax cut legislation on the revenues of Missouri's regulated utilities. The Commission directed the PSC Staff (Staff) to file a report summarizing stakeholder input and to provide recommendations for developing a prompt plan of response designed to ensure that Missouri public utility rates are just and reasonable.

On February 22, 2018, the Commission opened cases for seven investor-owned utilities to determine the impact of federal tax cuts on customer rates as a result of TCJA.

The Commission directed those investor-owned utilities to show cause, if any, why the Commission should not order the companies to promptly file tariffs reducing their rates for every class and category of natural gas, steam or electric service to reflect the percentage reduction in their federal-state effective income tax rate. As part of their response, all of these companies were directed to state their position on whether the Commission can order a reduction in utility rates without considering all relevant factors in an extended general rate case.

These companies were also directed to quantify and track all impacts of the TCJA potentially affecting natural gas, steam or electric service rates from January 1, 2018, going forward. In addition, they were to quantify and track their excess protected and unprotected Accumulated Deferred Income Tax (ADIT) for future possible flow back to ratepayers, and advise the Commission how best such flow-back may be accomplished.

In a March 8, 2018 order, the Commission also opened a working case to investigate the effect of TCJA on the revenues of regulated small water and sewer utilities in Missouri.

On June 1, 2018, Governor Eric Greitens signed into law state legislation (Senate Bill 564, or "SB 564") that, among other provisions, provides the Commission one-time authority to adjust electric rates prospectively for those electric utilities that did not have a general rate proceeding pending before the Commission to pass on the impact of the TCJA to customers in rates within 90 days. This provision contained an emergency clause making it effective upon signing, or June 1, 2018. Following enactment of this new law, the Commission opened additional dockets for qualifying electric utilities in order to implement the single-issue TCJA rate adjustments.

The following provides details for specific actions taken to date regarding TCJA rate changes for each major Missouri utility:

Ameren Missouri

Electric – A show cause case (Case No. ER-2018-0226) was filed by Staff regarding Union Electric Company d/b/a Ameren Missouri's electric operations on February 16, 2018. Following passage of SB 564, the Commission also opened Case No. ER-2018-0362 on June 4, 2018. On July 5, 2018, the Commission approved a stipulation and agreement calling for a total reduction in Ameren Missouri's electric rates of approximately $166.5 million effective August 1, 2018. This rate reduction took into account both the reduction in the federal corporate income tax rate and a flow-back in rates of excess deferred taxes. In addition, the agreement required Ameren Missouri to defer the financial impact of the TCJA on its financial statements from January through July 2018 so that this benefit can also be passed on to customers in future general rate proceedings.

Gas – On February 16, 2018, a show cause case was filed by Staff regarding the impact of the TCJA on Ameren Missouri's gas operations in Case No. GR-2018-0227. Further action in this docket is still pending.

Kansas City Power & Light Company (KCP&L)

Electric – Kansas City Power & Light Company (KCP&L) filed a general rate increase case (Case No. ER-2018-0145), on January 30, 2018. The Commission must decide this rate case, including any TCJA issues, by late December 2018.

KCP&L Greater Missouri Operations (GMO)

Electric – KCP&L-Greater Missouri Operations Company (GMO) filed a general rate increase case (Case No. ER-2018-0146), on January 30, 2018. The Commission must decide this rate case, including any TCJA issues, by late December 2018.

Steam Heat – On February 16, 2018, a show cause case was filed by Staff regarding the impact of the TCJA on GMO's steam heating operations in Case No. HR-2018-0231. Further action in this docket is still pending.

Empire District Electric Company (Empire)

Electric – A show cause case (Case No. ER-2018-0328) was filed by Staff regarding The Empire District Electric Company's (Empire) electric operations on February 16, 2018. Following passage of SB 564, on June 4, 2018 the Commission also opened Case No. ER-2018-0366. After a hearing in Case Nos. ER-2018-0228 and ER-2018-0366, the Commission ordered Empire to reduce its customer rates by approximately $17.8 million to be effective August 30, 2018 to account for its lower federal corporate income tax rate. In addition, Empire is required to defer the financial impact of the TCJA on its financial statements from January through August of 2018 so that this amount can also be passed on to customers in future general rate proceedings. Finally, Empire is required to defer the impact of the still unquantified excess deferred income tax flow-back to customers on its financial statements so that this amount also can be passed on to customers in future general rate proceedings.

Gas – A show cause case was filed by Staff regarding the impact of the TCJA on Empire's gas operations on February 16, 2018, in Case No. GR-2018-0229. Further action in this docket is still pending.

Spire Missouri Incorporated (Spire Missouri)

Gas – Spire Missouri Incorporated d/b/a Spire Missouri had general rate increase requests before the Commission at the time of the TCJA's enactment (Case Nos. GR-2017-0215 for Spire East and No. GR-2017-0216 for Spire West). The Commission ordered additional proceedings in these rate cases in order to determine whether TCJA financial impacts should be incorporated into Spire Missouri customer rates. In its Amended Report and Order issued for these cases on March 7, 2018, the Commission ordered that the rates resulting from the Spire Missouri rate cases incorporate both the federal corporate income tax rate reduction and a flow-back of excess deferred taxes to customers resulting from the TCJA.

Liberty Utilities Midstates Natural Gas Corporation (Liberty Utilities)

Gas – Liberty Utilities had a general rate increase request filing before the Commission at the time of the TCJA's enactment (Case No. GR-2018-0013). On June 6, 2018, the Commission approved a stipulation and agreement resulting in a rate change for Liberty Utilities that incorporated the federal corporate income tax reduction due to the TCJA. As part of this agreement, Liberty Utilities is required to defer the financial impact of the excess deferred income tax flow-back to customers on its financial statements so that this amount also can be passed on to customers in future general rate proceedings.

Summit Natural Gas Company (Summit Natural Gas)

Gas – On February 16, 2018, a show cause case was filed by Staff regarding the impact of the TCJA on Summit Natural Gas' operations in Case No. GR-2018-0230. Further action in this docket is still pending.

Missouri-American Water Company (MAWC)

Water – Missouri-American Water Company had a general rate increase request filing before the Commission at the time of the TCJA's enactment (Case No. WR-2018-0285). On May 2, 2018, the Commission approved a stipulation and agreement in that case resulting in a rate change for Missouri-American Water that incorporated the federal corporate income tax reduction due to the TCJA. As part of this agreement, Missouri-American Water is required to defer the impact of the excess deferred income tax flow-back to customers on its financial statements so that this amount also can be passed on to customers in future general rate proceedings.

Veolia Energy Kansas City, Inc. (Veolia)

Steam Heat – On February 16, 2018, a show cause case was filed by Staff regarding the impact of the TCJA on Veolia Energy's steam heating operations, Case No. HR-2018-0232. On May 10, 2018, Veolia Energy filed a general rate change application with the Commission in Case No. HR-2018-0341. Ratemaking determination regarding the impact of the TCJA on Veolia's customer rates will be made as part of this rate case process. The Commission decision regarding the rate change request in Case No. HR-2018-0341 is expected in late 2018 or early 2019.

STATE LEGISLATION

Senate Bill 564

In 2018, the General Assembly passed, and the governor signed, Senate Bill 564, which modifies several statutory provisions related to Commission-regulated electric utilities effective August 28, 2018. Key provisions of the bill include: an electric revenue stabilization mechanism; authority for the Commission to authorize adjustments related to the federal Tax Cuts and Jobs Act; plant-in-service accounting (PISA) treatment; economic development riders; a competitive bidding process for infrastructure investments; rate cap provisions; utility scale solar requirements; and solar rebates.

Section 386.266 allows electric utilities to request a revenue stabilization mechanism for periodic rate adjustments outside a general rate proceeding to account for changes in customer usage due to variations in weather, conservation, or both.

Section 393.137 is applicable to any electric utility that did not have a general rate proceeding pending before the Commission. It provides the Commission one-time authority to adjust electric rates prospectively or allow deferrals to account for the federal Tax Cuts and Jobs Act. This provision contains an emergency clause making it effective upon signing, or June 1, 2018.

Section 393.1400 allows an electric utility to elect use of plant in service accounting, a special accounting treatment applied to all plant additions, except new coal, nuclear or natural gas generating plants and additions allowing service to new customers. PISA treatment allows deferral of up to 85% of both depreciation expense on qualifying plant and a rate of return applied to the net qualifying plant balance. In subsequent rate cases, the PISA deferral balance is amortized over 20 years. PISA treatment expires December 31, 2023, but electric utilities may request it be continued until December 31, 2028. The Commission may grant or deny the request to continue PISA treatment based on an evaluation of the costs and benefits of continuation. Electric utilities that take advantage of PISA treatment are required to submit annual five year capital investment plans. At least 25% of the investment plan must be for grid modernization projects.

Section 393.1655 requires any electric utility that elects PISA treatment to hold base rates constant for a three-year period starting on the effective date of rates of its last general rate proceeding, unless there is a “force majeure” event such as weather or other event which threatens the financial integrity of the utility. Electric utilities that elect PISA treatment are subject to compounded annual growth rate caps during the time the PISA treatment is in place. Any increases that exceed the cap as a result of the Fuel Adjustment Clause (FAC), the Renewable Energy Standard Rate Adjustment Mechanism (RESRAM) or the Environmental Cost Recovery Mechanism (ECRM) are deferred for future recovery. Large power customers cannot receive an increase greater than 2% during the same period. Any increase for large power customers above the 2% is allocated to all other customers.

Section 393.1640 allows an electric customer that adds incremental load of 300kW on average per month and receives local, regional or state economic development incentives to receive an average discount on their electric bill of 40% for up to five years. The reduced revenues to the electric utility resulting from the reduced rates are allocated to all other customers on an equal basis.

Section 393.1650 requires an electric utility with more than one million retail customers to develop a competitive bidding/qualification process for projects on its distribution system. The Commission is required to submit a report to the General Assembly by December 31, 2020 and annually thereafter detailing the effects of the competitive bidding/qualification process.

Section 393.1655 requires electric utilities to invest in utility-owned solar by December 31, 2023. The electric utility is not required to obtain Commission permission to construct the facility in Missouri or an adjacent state, and the investment is deemed prudent.

Section 393.1670 provides solar rebates of $.50/watt for systems becoming operational between January 1, 2019 and June 30, 2019, and $.25/watt for systems becoming operational after June 30, 2019 through December 31, 2023. The rebates apply to new or expanded solar systems. Residential customers may receive rebates up to 25kWs per system and non-residential customers may receive rebates up to 150kWs per system.

Senate Bill 705

In 2018, the General Assembly passed, and the governor signed, Senate Bill 705, which allows water corporations with more than 8,000 customers to request and the Commission to approve at its discretion, a revenue stabilization mechanism for periodic rate adjustments outside a general rate proceeding due to any variation in revenues resulting from increases or decreases in residential, commercial, public authority and sale for resale usage. Senate Bill 705 also requires a water utility with more than 1,000 Missouri customers to develop a competitive bidding/qualification process for projects on its distribution system. The Commission is required to submit a report to the General Assembly by December 31, 2020, and annually thereafter detailing the effects of the competitive bidding/qualification process.

COMMISSION RULEMAKINGS

A General Review of the Commission's Rules
(File No. AW-2017-0336)

The Commission opened this working case on June 14, 2017, to facilitate the review of Commission rules pursuant to Executive Order 17-03. The internal review process was complete by December 31, 2017, and concluded with the PSC Staff making several recommendations on rules that could be consolidated, streamlined, or otherwise improved to be more user-friendly.

The Commission pursued several of Staff's working case and rulemaking recommendations (see Case Nos. AW-2018-0385, AW-2018-0393, AW-2018-0394, WW-2018-0392, AX-2018-0257, GX-2018-0279, TX-2018-0120, TX-2018-0188).

Filing of Applications for Certificate of Convenience and Necessity
(File No. EX-2018-0189)

On April 4, 2018, the Commission issued its *Finding of Necessity and Order Directing That Proposed Rule Amendment be Filed for Publication.* The proposed rule amendment modified the Commission's rules regarding the filing of applications for certificates of convenience and necessity (CCN) by electric utilities. Several comments were received and a hearing was held on June 19, 2018. The Commission issued its final order of rulemaking in August 2018 making several changes to the proposed rule amendments. The final order of rulemaking outlines the requirements for obtaining a CCN to: 1) Provide electric service to retail customers pursuant to Section 393.170.2; 2) Construct an asset pursuant to Section 393.170.1, or 3) Operate an asset pursuant to Section 393.170.2. As part of the rule, when issuing a CCN, the Commission may impose conditions it deems reasonable and necessary, and may, by its order, make a determination on the prudence of the decision to operate or construct an asset subject to the Commission's subsequent review of costs and applicable timelines.

Staff Assisted Small Utility Rate Cases
(File No. AX-2018-0050)

On September 27, 2017, the Commission issued its *Finding of Necessity and Order Directing That Proposed Rule Amendment be Filed for Publication.* Comments were received and a hearing was held December 21, 2017. The Commission issued its final order of rulemaking on April 27, 2018. In its final order, the Commission commented, "[s]ome small utilities can be intimidated by the prospect of a rate case, and, if not assisted through the process, may forego a necessary rate case. Some small utilities have waited more than 20 years to request a rate case. At best, that means their ratepayers may face a very large rate increase when rates are finally adjusted. At worst, the small utility may not have sufficient revenue to meet its obligation and can enter a downward spiral of deferred or ignored maintenance, leading to poor or unsafe service, from which it may not be able to recover." Under the amended rule, which became effective May 30, 2018, Staff will assist small utilities with the rate case process. The mechanisms contained within the amended rule are part of a suite of solutions the Commission is pursuing to address challenges that have persisted for decades for Missouri's small water and sewer utilities.

Incentives for Acquisition of Nonviable Utilities
(File No. AX-2018-0240)

On May 30, 2018, the Commission issued its *Finding of Necessity and Order Directing That Proposed Rule Amendment be Filed for Publication.* Small water and sewer utilities often do not have the financial means to make capital improvements necessary to keep the utility viable, which leaves the utility little choice other than to transfer its assets to an entity that can provide safe and adequate service. However, a nonviable utility frequently does not have value sufficient to attract buyers. The proposed rule is designed to encourage acquisition of nonviable water or sewer utilities by entities that are better able to provide service to the public. The mechanisms contained within the proposed rule are part of a suite of solutions the Commission is pursuing to address challenges that have persisted for decades for Missouri's small water and sewer utilities. Comments were filed and a hearing was held August 7, 2018.

A final order of rulemaking was issued by the Commission on October 3, 2018 and was sent to the Joint Committee on Administrative Rules (JCAR) on the same day. A final order of rulemaking is expected to be filed with the Secretary of State in November, 2018, and is expected to become effective on January 30, 2019.

Creation of an Environmental Improvement Fund
(File No. AX-2018-0241)

On May 30, 2018, the Commission issued its *Finding of Necessity and Order Directing That Proposed Rule Amendment be Filed for Publication.* Small water and sewer utilities often do not have the financial means to accomplish mandated capital improvements to their systems. Failure to make these improvements can result in enforcement actions against the utility or, worse, degradation of safe and adequate service. The proposed rule is designed to provide parameters and procedures for small water or sewer utilities, or both, to request a special fund to collect revenues from customers to make improvements necessitated by environmental regulations. The mechanisms contained within the proposed rule are part of a suite of solutions the Commission is pursuing to address challenges that have persisted for decades for Missouri's small water and sewer utilities. Comments were filed and a hearing was held August 7, 2018.

A final order of rulemaking was issued by the Commission on October 3, 2018 and was sent to the Joint Committee on Administrative Rules (JCAR) on the same day. A final order of rulemaking is expected to be filed with the Secretary of State in November, 2018, and is expected to become effective on January 30, 2019.

ELECTRIC

RATE CASES FILED

KCP&L-Greater Missouri Operations Company
(Case No. ER-2018-0146)
& Kansas City Power & Light Company
(Case No. ER-2018-0145)

On January 30, 2018, KCP&L and GMO filed electric rate cases with the Commission seeking to increase annual electric operating revenues, after rebasing of fuel, by approximately $16.4 million (KCP&L) and $19.3 million (GMO).

According to the KCP&L and GMO filings, recovery of new investments made since the 2016 rate cases, continuing increases in transmission costs and reduced electricity usage per customer were among the factors creating the need for increased customer rates.

Also in its filing, KCP&L cites increased state assessed property taxes as a reason for seeking an increase in customer rates.

Both rate case filings reflect the lowering of the corporate federal tax rate from 35% to 21% under the federal TCJA which took effect on January 1, 2018.

KCP&L and GMO also requested the continuation of the FAC mechanism with a few modifications.

Evidentiary hearings in the rate cases were scheduled for September 24 through September 28.

OTHER ELECTRIC ISSUES

The Empire District Electric Company Customer Savings Plan
(Case No. EO-2018-0092)

On October 31, 2017, Empire sought Commission approval of a proposed plan to develop up to 800 MWs of wind generation in or near Empire's service territory using federal tax incentives in conjunction with a tax equity partner and retiring a coal-fired unit (Customer Savings Plan).

A Non-Unanimous Stipulation and Agreement between many of the parties was filed on April 24, 2018. Among other things, the Agreement requested the Commission authorize Empire to enter into purchase agreements for up to 600 MWs of wind projects and not retire the coal-fired unit at this time.

The Commission held an evidentiary hearing in May 2018, and issued a Report and Order on July 11, 2018. In its decision, the Commission stated that it had considered the positions and arguments of all the parties, and after applying the facts to the law, the Commission determined that Empire had shown by a preponderance of the evidence that certain provisions of the Customer Savings Plan should be approved.

The Commission granted some of Empire's requests, including authorizing Empire to record its capital investment as utility plant in service subject to audit in Empire's next general rate case; setting the depreciation rate to be utilized for the wind project; and, granting Empire a variance from some of the Commission's affiliate transaction rules.

Great Plains Energy, Inc.'s Acquisition of Westar Energy, Inc.
(Case No. EM-2018-0012)

On August 31, 2017, Great Plains Energy, Inc. (GPE), KCP&L, GMO and Westar Energy, Inc. (Westar) filed an application for approval of merger, a request for variance from certain Commission rules and a motion for expedited treatment.

Non-Unanimous Stipulations and Agreements between many of the parties were filed in January and March 2018. An evidentiary hearing was held in March 2018, and the Commission issued its Report and Order approving the plan of merger subject to various conditions and commitments contained in the two Agreements. Some of those conditions and commitments include:

- $75 million in one-time bill credits will be shared by Missouri and Kansas retail electric customers within 120 days of the closing of the merger.
- Retail electric rates for KCP&L and GMO customers will not increase as a result of the merger.
- KCP&L's and GMO's fuel and purchased power costs will not be adversely impacted by the merger.
- KCP&L and GMO will meet or exceed the customer service and operational levels currently provided to their Missouri retail customers.
- The holding company will maintain and promote all low-income assistance programs consistent with those in place at all operating utility companies prior to the merger for at least five years after closing.
- No involuntary employee layoffs due to the merger or plant retirements.
- Transaction costs will not be recovered in rates, and transition cost recovery will be limited.
- The new holding company headquarters will be in Kansas City, Missouri while also retaining the existing Westar headquarters in Kansas.

"The Merger benefits ratepayers by providing an opportunity to reduce the upward pressure on customers' rates from increasing costs and flat or declining customer usage," said the Commission. "Combining the companies will create operational efficiencies, without involuntary staff layoffs, resulting in net savings from the Merger over the first five years after closing of approximately $555 million. The Merger provides upfront customer bill credits, no recovery of transaction costs in rates, and no change in the nature of customers' interactions with their service provider. All these Merger savings serve to reduce the cost of service and to delay rate increases that would be required absent the Merger."

Ameren Missouri - Pilot Subscriber Solar Program
(Case No. EA-2016-0207)

Ameren Missouri requested the Commission approve a Subscriber Solar Pilot Tariff program on April 27, 2016. A Stipulation and Agreement was filed in that case and approved by the Commission on October 15, 2016. Ameren Missouri subsequently pursued the program identifying an area at the St. Louis Lambert International Airport as the location for the solar pilot and collected the needed bids to begin construction.

After Ameren Missouri acquired the necessary bids, the parties to the first Stipulation and Agreement agreed to amend a term that stated the program would consist of two 500 kW facilities. The second amended Stipulation and Agreement, filed on August 20, 2018, states that a single 1 MW facility will be built, and further states the cost differential between construction of two 500 kW facilities and a single 1 MW facility sufficiently justifies modifying the original term that two 500 kW facilities be built.

Ameren Missouri – "Green Tariff" Subscription-Based Renewable Choice Program
(Case No. ET-2018-0063)

On November 27, 2017, Ameren Missouri filed a request for approval of a tariff reflecting the terms of a renewable choice program designed to provide customers with a load of 2.5 MWs or greater, or governmental entities like cities, towns, and villages in Missouri, the opportunity to subscribe to wind energy. The subscriptions are in addition to, not a replacement for, the customer's normal electric service.

The Commission approved a Stipulation and Agreement in the case, on June 27, 2018, that permits Ameren Missouri to subscribe eligible customers, with the program total capped at 400 MW of wind energy.

Ameren Missouri – Wind Generation Facility
(Case No. EA-2018-0202)

On May 21, 2018, Ameren Missouri filed an application requesting a Certificate of Convenience and Necessity (CCN) authorizing it to construct, own and operate a wind generation facility in Schuyler and Adair Counties.

The wind generation facility is to be constructed pursuant to a Build Transfer Agreement (BTA) Ameren Missouri entered into with TG High Prairie Holdings, LLC. The application also requests Commission authority to merge the special-purpose entity into Ameren Missouri, with Ameren Missouri being the surviving entity.

In addition, Ameren Missouri sought approval of a RESRAM – a separate line item on customers' bills - and approval of certain variances from the Commission's RESRAM rules. Ameren Missouri stated that this facility is one of multiple wind projects needed to comply with the Missouri Renewable Energy Standard (RES). Evidentiary hearings are scheduled for October 30 – November 2.

Grain Belt Express Clean Line LLC
(Case No. EA-2016-0358)

On August 30, 2016, Grain Belt Express Clean Line LLC (Grain Belt) filed an application for a certificate of convenience and necessity (CCN) authorizing it to construct, own, operate, control, manage, and maintain electric transmission facilities within Buchanan, Clinton, Caldwell, Carroll, Chariton, Randolph, Monroe and Ralls Counties, Missouri, as well as an associated converter station in Ralls County, and waiving certain reporting requirements. An evidentiary hearing was held on March 24, 2017.

On March 28, 2017, the Missouri Court of Appeals-Western District filed an opinion in a separate CCN case, the *Matter of Ameren Transmission Co. of Illinois* (ATXI). The Court's opinion determined that the Commission lacked authority to grant a CCN without evidence that ATXI had received county assents, even though the Commission made the CCN conditional on ATXI obtaining the assents in the future. The Western District Court of Appeals vacated the Commission's Report and Order issuing a CCN to ATXI.

In light of the ATXI opinion, the Commission determined supplemental briefing and oral argument was appropriate to discuss the effect of the ATXI opinion on Grain Belt's application. An oral argument was held on August 3, 2017.

The Commission issued its Report and Order on August 16, 2017, denying Grain Belt's application for a CCN because Grain Belt "failed to meet, by a preponderance of the evidence, its burden of proof to demonstrate that it has obtained all county assents" necessary for a CCN as required by the ATXI opinion. The decision was appealed to the Missouri Court of Appeals-Eastern District (Eastern District) in September 2017. The Eastern District issued an opinion and transferred the case to the Missouri Supreme Court on its own motion due to the general interest and importance of the issue presented.

On July 17, 2018, the Missouri Supreme Court issued its opinion (Case No. SC96993). In making its decision, the Court first clarified that the Legislature provided two types of CCNs under Section 393.170, commonly referred to as "line certificates" and "area certificates". The Court declared that "The Commission's grant of a *line* CCN does not require prior consent from affected counties" pursuant to Section 393.170.1. It is Subsection 2 that "requires prior consent from would-be affected counties before the Commission can grant approval." In evaluating the Commission's reliance on the ATXI decision as requiring dismissal of Grain Belt's application for lacking county assents, the Court clarified "Section 393.170 clearly provides for two types of CCNs and explicitly requires prior consent from would-be affected counties to obtain one type of CCN, an *area* CCN, but not the other, a *line* CCN. To the extent ATXI suggests consent from every would-be affected county is required before the Commission can grant a *line* CCN, it should not be followed."

The Court ultimately concluded "The Commission erroneously concluded it could not lawfully grant a line CCN to Grain Belt without the utility first obtaining consent from the affected counties. Such consent is not required before obtaining a *line* CCN pursuant to section 393.170.1. Consent is required if the utility is seeking an *area* CCN pursuant to section 393.170.2, but it was clear under the facts in the instant case that an area CCN was not requested. Grain Belt acknowledges it ultimately will need county assent pursuant to section 229.100 if it intends to construct utilities impacting publicly owned roads, but such assent is not relevant to the Commission's decision in issuing a *line* CCN. Consequently, the Commission's order denying Grain Belt's application for a line CCN is reversed, and the case is remanded to the Commission to determine whether Grain Belt's proposed utility project is necessary or convenient for the public service." (footnote omitted).

Ameren Transmission Company of Illinois (ATXI) (Case No. EA-2017-0345)

On September 15, 2017, ATXI submitted an application for a CCN authorizing it to construct, install, own, operate, control, manage and maintain a new 345-kV electric transmission line running generally from Palmyra, Missouri and generally proceeding along an existing east-west 161-kV transmission line corridor through Marion, Lewis, Knox and Adair counties to a new substation located near Kirksville, Missouri, and then generally proceeding along an existing north-south 161-kV transmission line corridor through Adair and Schuyler counties, to a connection point on the Iowa border (Project).

In January 2018, a Unanimous Stipulation and Agreement was submitted by the parties in the case. In the Agreement, the parties agreed that the Commission had evidence to conclude that the Project is necessary or convenient for the public service subject to certain conditions. On January 10, 2018, the Commission granted the application subject to certain conditions and also approved the Agreement.

Fuel and Purchase Power Prudence Reviews

All four investor-owned electric utilities, Ameren Missouri, Empire, KCP&L and GMO, have Commission-approved FACs through which the electric utility recovers from or refunds to customers 95 percent 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.

In fiscal year 2018, Staff completed prudence reviews of fuel and purchased power costs and revenues included in the FACs of KCP&L (Case No. EO-2017-0231), GMO (Case No. EO-2017-0232) and Ameren Missouri (Case No. EO-2018-0067). 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 KCP&L, GMO or Ameren Missouri.

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 annual update filing to comply with 4 CSR 240-22.080(1) or 4 CSR 240-22.080(3), respectively.

Three Chapter 22 triennial compliance filings were made in fiscal year 2018:

- Ameren Missouri on September 25, 2017 (Case No. EO-2018-0038);
- KCP&L on April 2, 2018 (Case No. EO-2018-0268); and
- GMO on April 2, 2018 (Case No. EO-2018-0269).

Empire filed an annual update filing on March 15, 2018 (Case No. EO-2018-0233).

Missouri Energy Efficiency Investment Act

The purpose of the Missouri Energy Efficiency Investment Act (MEEIA), Section 393.1075 RSMo, is to encourage investor-owned electric utilities to develop and implement demand-side management (DSM) programs, which are commonly called energy efficiency programs or demand response programs.

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

On December 12, 2014, Ameren Missouri (Case No. EO-2015-0055), requested approval of demand-side programs, a technical resource manual (TRM) and a DSIM for its MEEIA Cycle 2. Ameren Missouri's MEEIA Cycle 2 DSM programs' implementation began on March 1, 2016, and programs will end February 28, 2019. On June 4, 2018, Ameren Missouri (Case No. EO-2018-0211) requested approval of demand-side programs, a TRM and a DSIM for a 6-year MEEIA Cycle 3.

On August 28, 2015, KCP&L (Case No. EO-2015-0240) requested approval of demand-side programs, a TRM and a DSIM for its MEEIA Cycle 2. KCP&L's MEEIA Cycle 2 DSM programs' implementation began on April 1, 2016, and programs will end March 31, 2019.

On August 28, 2015, GMO (Case No. EO-2015-0241) requested approval of demand-side programs, a TRM and a DSIM for its MEEIA Cycle 2. GMO's MEEIA Cycle 2 DSM programs' implementation began on April 1, 2016, and all programs will end March 31, 2019.

Commission rules require that a prudence review of the costs subject to each approved DSIM be conducted by the PSC 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 2018, Staff completed its first prudence review of costs for the DSIMs of Ameren Missouri's MEEIA Cycle 2 (Case No. EO-2018-0155). PSC Staff investigated the 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 its fiscal year 2018 DSIM prudence review, Staff found Ameren Missouri imprudently included certain non-MEEIA costs in its DSIM. Subsequently, the Commission ordered that $46,000 plus interest be returned to Ameren Missouri's customers in Ameren Missouri's next DSIM Rider rate adjustment filing.

NATURAL GAS RATE CASES

Spire Missouri
(Case No. GR-2017-0215 & Case No. GR-2017-0216)

On April 11, 2017, Spire Missouri filed general rate increase requests for its Spire East Division (formerly Laclede Gas Company) and its Spire West Division (formerly Missouri Gas Energy).

The Spire East Division sought to increase base natural gas revenues by approximately $58.1 million annually, of which approximately $29.5 million was already being collected from Spire East customers through the infrastructure system replacement surcharge (ISRS). The Spire West Division sought to increase base natural gas revenues by approximately $50.4 million, of which approximately $13.4 million was already being collected from customers through the ISRS.

On March 22, 2018, the Commission issued its Report and Order granting Spire East an increase to its base rates of approximately $18 million. At the same time, Spire East's ISRS revenues were approximately $32.6 million and the Commission ordered that Spire East's ISRS rate be reset to zero, meaning Spire East customers actually received a net overall rate decrease of approximately $14.6 million.

In the same Report and Order, the Commission granted Spire West an increase to its base rates of approximately $15.2 million. At the same time, Spire West's ISRS revenues were approximately $16.4 million and the Commission ordered that the Spire West ISRS be reset to zero, meaning that Spire West customers actually received a net overall rate decrease of approximately $1.2 million.

Under state law, the Commission may authorize a natural gas utility to make rate adjustments outside of a general rate case to reflect non-gas revenue effects of increases or decreases in residential and commercial customer usage, but only if the revenue effects are due to variations in either weather, conservation or both. As part of these rate increase requests, Spire Missouri sought authorization to implement a “Revenue Stabilization Mechanism” (RSM) to obtain the ability to make such rate adjustments in the future.

In its decision, the Commission approved an alternative approach to the RSM called a Weather Normalization Adjustment Rider (WNAR). The WNAR allows rate adjustments based only on weather variations. With a WNAR, Spire Missouri will make rate adjustments twice a year based upon the weather.

As part of the Commission’s decisions in these cases, low-income weatherization programs and arrearage reduction programs will continue. A low-income energy affordability program will continue in the Spire East Division and the same program will be implemented in the Spire West Division.

Liberty Utilities Gas Rate Case
(Case No. GR-2018-0013)

On September 29, 2017, Liberty Utilities filed a request for an increase in revenues of approximately $7.5 million. A Unanimous Stipulation and Agreement was filed by the parties on May 24, 2018, and included an agreed upon increase of $4.6 million; implementation of a Weather Normalization Adjustment Rider (WNAR); implementation of a low-income affordability program; continuation of energy efficiency and low-income weatherization programs; and consolidation of the Northeast (NEMO) and West (WEMO) rate districts. The Commission issued its Report and Order approving the Agreement on June 6. New rates became effective on July 1, 2018.

Other Natural Gas Issues

Spire Missouri - Infrastructure System Replacement Surcharge (ISRS)
(Case Nos. GO-2016-0332, GO-2016-0333, GO-2017-0201, GO-2017-0202, GO-2018-0309, GO-2018-0310)

On November 21, 2017, the Western District of the Missouri Court of Appeals overturned the Commission’s orders in Case Nos. GO-2016-0332 and GO-2016-0333 to the extent that those orders allowed Spire ISRS recovery of costs for replacement of plastic components that were not worn out or in a deteriorated condition. The Western District remanded the cases to the Commission for further proceedings consistent with its opinion.

Notably, as the appeal had been ongoing, Spire filed subsequent ISRS applications (Case Nos. GO-2017-0201 and GO-2017-0202). Parties to those cases filed a unanimous stipulation and agreement that included a term that the appellate court’s final decision on the ISRS eligibility for replacement costs of plastic components in the appealed ISRS cases would apply to the current ISRS cases.

Upon remand, the Commission ordered parties to file a statement of how they believed the Commission should proceed. After a series of responses, recommendations and briefs, oral arguments were held on August 9, 2018.

In an August 15 order requesting the filing of a procedural schedule, the Commission concluded that additional evidence was necessary for the Commission to resolve the cases in light of the Western District’s mandate.

During the remand, Spire filed two additional ISRS applications (Case Nos. GO-2018-0309 and GO-2018-0310). The Commission noted in an order scheduling an evidentiary hearing that a hearing for the 2018 cases would be scheduled at the same time as the 2016 and 2017 cases because the issues in all six cases are approximately the same. Hearings were scheduled for August 27-28, 2018.

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 and Summit Natural Gas.

The Procurement Analysis Department conducts an annual Actual Cost Adjustment (ACA) review for each natural gas LDC after they 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 Staff 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.

Another purpose of the ACA process is to examine the prudence of the LDC’s gas purchasing and operating decisions. For its analysis, the PSC Staff 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 for the ACA period.

Staff 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.

The Procurement Analysis Department, in conjunction with other Staff, held discussions with the LDCs regarding their hedging activities for the 2017/2018 winter, and to inquire as to whether the LDCs were taking actions to mitigate the effects of potential winter price spikes on their price of gas in a cost effective manner.

Other Proceedings

The Commission opened a case (Case No. GO-2018-0195) on January 18, 2018, to direct the Staff to investigate reports that Summit Natural Gas of Missouri, Inc. interrupted gas deliveries to certain transportation customers in its Rogersville service division, including the Lebanon, Missouri area during the particularly cold weather.

Though no safety or tariff violations were noted, the Staff suggested Summit improve its customer communication and education efforts to better inform its non-residential customers of the curtailment process. Summit responded to Staff's report on May 19, 2018 accepting the offered recommendations.

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

The Procurement Analysis Department also participates in the rate design review of the gas ISRS.

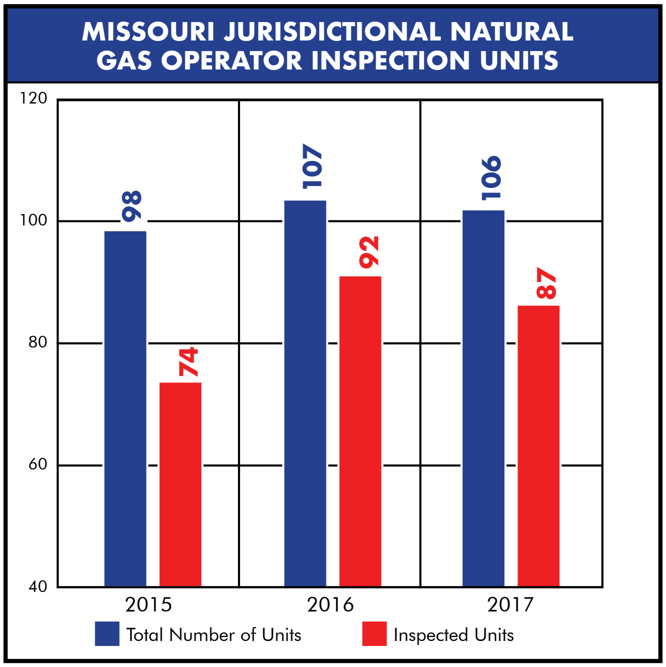
NATURAL GAS PIPELINE SAFETY PROGRAM

The Commission has safety jurisdiction over intrastate natural gas pipeline operators in Missouri which includes five intrastate transmission-only pipelines, five investor-owned natural gas distribution utilities (all of which additionally operate intrastate transmission pipelines and all of which have multiple operating districts/inspection units), 41 municipally-owned natural gas distribution systems (one of which also has an intrastate transmission pipeline), one gas distribution system owned and operated by a private company on a U.S. Department of Defense facility at Fort Leonard Wood, one pipeline system that supplies landfill gas

directly to a combined heat and power system and operators of master meter systems. In 2017, there were a total of 70 natural gas operators over which the PSC had safety jurisdiction.

In 2017, the Missouri intrastate natural gas pipeline operators were divided into 106 "inspection units" for purposes of the Natural Gas Pipeline Safety Program's comprehensive inspections, which included approximately 28,000 miles of natural gas distribution mains, approximately 1,000 miles of intrastate natural gas transmission pipelines and over 1.5 million natural gas service lines.

PSC Safety Engineering Department Staff are in the field throughout the year inspecting and evaluating these pipeline systems. During the 2017 calendar year, Safety Engineering Department Staff conducted over 100 individual inspections, including comprehensive records and field compliance follow-up, construction, operator qualification, operating and maintenance procedures, distribution and transmission integrity management, public awareness effectiveness, control room management procedures and operations, and incident investigations.



The Commission's natural gas pipeline safety program is carried out under a cooperative agreement with the U.S. Department of Transportation – Pipeline and Hazardous Materials Safety Administration (PHMSA). As a part of this program, the Commission has adopted the applicable federal pipeline safety regulations, including 49 CFR Parts 191, 192, and 199 that make up the minimum federal safety standards applicable to natural gas pipelines. The most recent changes to the Commission's natural gas pipeline safety regulations adopting amendments to applicable federal regulations became effective June 30, 2017.

The Commission continues to take a proactive approach in Missouri to improve the safety and integrity of each pipeline system. This approach includes conducting on-site inspections, including: tracking and evaluating various vintage pipeline replacement programs; leak survey inspections; evaluation of leak and damage responses; response to public reported gas leaks/odors; leak investigations and classifications; corrosion control of metallic pipelines; pipeline integrity management; operator procedures and qualifications; public awareness programs and effectiveness; control room management procedures and operations; and incident investigations.

FEDERAL NATURAL GAS AND ELECTRIC CASES

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

The Commission filed its notice of intervention (NOI) in 30 cases at FERC during the fiscal year ending June 30, 2018. An NOI allows the Commission to participate in a case before FERC as a party to the case. As a party to a FERC case, the Commission has access to all confidential documents provided to parties throughout the case and may participate in settlement negotiations to resolve any issues brought by the parties to the case. In FERC cases where the Commission has specific concerns, either comments or a protest may be filed. The Commission filed either comments or protests in three of the cases to which it was a party in fiscal year 2018.

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

Federal Natural Gas Activities

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

Missouri's Local Distribution Companies (LDCs), including both natural gas utilities and electric utilities that generate energy with natural gas-powered combustion turbines, must rely on FERC regulated interstate pipelines for storage and delivery of their natural gas supplies. Currently 11 interstate pipelines physically located within the boundaries of the state of Missouri are able to serve Missouri utility companies, with an additional 4-6 upstream pipelines providing transportation and, in some cases, natural gas storage service.

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

Natural Gas Pipeline Company of America (NGPL)
FERC Docket No. RP17-303/RP17-913

FERC initiated an over-earnings proceeding against NGPL in January 2017. NGPL serves Ameren Missouri, Spire Missouri (formerly Laclede Gas Company), Liberty Utilities and several municipal natural gas systems in southeastern Missouri. The Commission and numerous customers of NGPL intervened in the case and participated in settlement discussions beginning in May 2017. A cost and revenue study completed by NGPL at FERC's direction indicated that the pipeline needed a sizable rate increase to cover its revenue requirements.

Through multiple settlement conferences, parties, FERC Staff and NGPL were able to reach a settlement of the over-earnings case in late July. Firm transportation customers of NGPL received a decrease in existing rates of 4.5% beginning no later than November 2017 with the rate reduction increasing to 6.5% in November 2018. In addition, NGPL agreed to expend $400 million for pipeline integrity-related activities between 2017 and 2021. A number of additional concessions benefiting NGPL customers were also included in the settlement agreement. FERC issued its Order conditionally approving the uncontested settlement on January 5, 2018.

Spire STL Pipeline
FERC Docket No. CP17-40

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

The Commission filed a conditional protest in the case raising concerns including requesting FERC to thoroughly examine all of the circumstances and impacts of the proposed pipeline as it determines whether Spire STL Pipeline has shown that construction of the pipeline is in the public interest, and not inadvertently expanding the decision into traditionally state jurisdictional decision-making authority. Comments and protests from other parties were also filed in the case raising additional issues.

The majority of the pipeline will be constructed in Illinois connecting to the Rockies Express Pipeline, and it will provide the St. Louis area with access to shale gas from the eastern United States. Since the filing of the Spire STL Pipeline application, the course of the pipeline has been modified. An environmental study was completed in September 2017 to analyze the impact of the pipeline construction. FERC Staff also requested additional information from Spire STL Pipeline and parties in the case to assist it in its analysis. FERC issued its Order approving the Spire STL Pipeline certificates on August 3, 2018.

MoGas Pipeline Company
FERC Docket No. RP18-877

MoGas Pipeline filed a rate case on May 31, 2018 to increase its natural gas pipeline transportation rates by more than double the current rates. MoGas Pipeline serves customers from St. Louis (Spire Missouri) extending along the Interstate 44 corridor to Rolla, Missouri (Ameren Missouri) and Fort Leonard Wood, a U.S. Army installation. Several Missouri municipal natural gas systems (Cuba, Richland, Waynesville, St. James and St. Robert) are also served by MoGas Pipeline. The pipeline is approximately 263 miles in length extending from interconnections to Panhandle and REX in Pike County, Missouri and to a final interconnection with MRT in Madison County, Illinois.

The Commission, along with Ameren Services Company on behalf of Ameren Missouri and municipal customers, protested the rate increases. The proposed rate increases are currently under suspension by FERC and will not become effective until December 1, 2018. FERC has instructed parties to hold settlement discussions.

The Commission is in the process of analyzing MoGas Pipeline's revenue requirement data to consider challenges to the rate increases. The Commission will coordinate its positions in challenging the rate increases with other parties in the case. FERC Staff will also participate in the rate case settlement negotiations. This case will continue through the next fiscal year.

Enable Mississippi River Transmission, LLC
FERC Docket No. RP18-923

MRT filed a rate case on June 29, 2018 to increase its natural gas pipeline transportation rates by more than double the current rates. MRT alleges that its rate increase is materially affected by the construction of Spire STL Pipeline and the resulting turnback of capacity contracts by Spire Missouri.

MRT serves St. Louis (Spire Missouri), the Missouri municipal natural gas systems of Potosi and Bismarck, and industrial customers. MRT also serves portions of Arkansas and Illinois including a number of municipal natural gas systems. The pipeline's west line extends from Harrison County, Texas traveling east into Louisiana and then north to St. Louis. MRT's east line extends from St. Louis to Clay County, Illinois.

The Commission protested the rate increase. Other parties to the case, including Ameren Missouri, Ameren Illinois, Spire Missouri and a collective group of municipal utility and industrial customers filed protests to the rate increase also. The protests challenged a number of costs included in MRT's cost of service. The Commission challenged the inclusion of income taxes because MRT's parent company is a master limited partnership (MLP).

FERC has recently modified its policy on the inclusion of income taxes in the rates of MLPs because of a D.C. Circuit Court of Appeals decision (No. 11-1479) that addressed the double recovery of income taxes through FERC's application of a Discounted Cash Flow analysis for the return on equity of pass-through entities. The Commission and other parties also challenged the absence of Spire Missouri capacity billing determinants in the calculation of MRT's rates.

FERC agreed with the Commission and parties and has required that MRT file revised tariff records and supporting work papers to remove the proposed tax allowance from its cost of service and to adjust its billing determinants to reflect the current status of service to Spire Missouri. While it is unknown at this time the impact of these changes to the cost of service, MRT included over $5 million of income taxes in its initial filing so the removal of those costs would reduce the proposed rates by over $5 million. Spire Missouri represents over 40 percent of the total revenues of MRT currently, so the impact of the inclusion of Spire Missouri billing determinants on MRT rates is substantial.

The Commission will participate in future settlement negotiations on behalf of Missouri natural gas customers.

Federal Electric Activities

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

MISO Transmission Customers v. MISO Transmission Owners
FERC Docket No. EL14-12

Several organizations of large industrial electric energy consumers in Illinois, Indiana, Michigan, Minnesota and Wisconsin filed an overearnings complaint case against MISO transmission owners in November 2013. The complainants challenged the just and reasonableness of the 12.38% base return on equity (ROE) being collected by MISO transmission owners through transmission formula rates. The Commission intervened in this case and also supported the collective efforts by the state commissions within the MISO service territory. The Commission contributed to the comments filed by the Organization of MISO States (OMS) and the litigation strategy leading up to the August 2015 hearing.

The initial decision issued on December 22, 2015 in this case lowered the base ROE to 10.32% and ordered refunds for the difference collected plus interest. The refund period covered revenues collected from November 12, 2013 through February 11, 2015. FERC issued a decision in this case on September 28, 2016 supporting the initial decision. Refunds were issued to MISO members in February 2017, including Ameren Missouri. However, rehearing requests filed in this case on October 28, 2016 are still pending at FERC.

MISO Transmission Customers v. MISO Transmission Owners–
FERC Docket No. EL15-45

This case was filed to provide for refunds beginning February 12, 2015 through May 11, 2016 because FERC electric complaint cases only provide for refunds covering a 15-month period. The arguments in this case expanded those filed in Docket No. EL14-12 and extended out in time the Discounted Cash Flow analysis period used in determining the base ROE. The Commission partnered with the Mississippi Public Service Commission, Missouri Joint Municipal Electric Utility Commission and Resale Power Group of Iowa to sponsor rebuttal testimony challenging the current 12.38% base ROE received by shareholder-owned MISO members with transmission formula rates. MISO transmission owners earn a rate of return on rate base that is included in the revenue requirement setting the transmission formula rate. The initial decision issued on June 30, 2016 reduced the base ROE to 9.7%. Refunds with interest were also ordered in this case.

The Commission is awaiting FERC's final decision in this case which could accept or reject the 9.7% base ROE. A reduction in base ROE would reduce transmission costs to members of MISO. Ameren Missouri is a member of MISO and recovers these transmission formula rate costs from its retail customers. The reduction in base ROE may lead to millions of dollars in savings annually.

MISO Transmission Owners appealed the June 18, 2015 and July 21, 2016 Orders in this case to the U.S. District of Columbia Circuit Court of Appeals (16-1325 and 16-1326). It is unknown at this time how this appeal, which is currently being held in abeyance, will affect the outcome of Docket No. EL15-45. A companion case (Docket No. EL16-99) was also appealed. The companion case asked if non-public MISO transmission owners should also be required to provide refunds related to transmission formula rate reduction in ROE. FERC's review of the initial decision in Docket No. EL15-45 is still pending.

MISO and Ameren Services Company on behalf of ATXI
FERC Docket No. ER18-463

On December 15, 2017, Ameren Services Company on behalf of its affiliate Ameren Transmission Company of Illinois (ATXI) and MISO requested authorization to implement a 100 basis-point incentive adder to the transmission rate of ROE for ATXI's portion of the Illinois Rivers and Mark Twain components of the Grand Rivers Project.

The Grand Rivers Project consists of all or parts of seven currently MISO approved Multi Value Projects (MVPs). The costs of MVPs are shared by MISO members, including Ameren Missouri and its retail customers. Basis-point incentive adders to the transmission ROE can lead to millions of dollars of additional costs over the life of the MVP (20-40 years).

The Commission protested the ATXI request for the 100 basis-point incentive adder because ATXI had already received risk-reducing incentives prior to construction of the Project. The Commission considered that this additional request for incentives failed to demonstrate that the prior incentives were insufficient to encourage the investment. The Commission further argued that the vast majority of the Project's costs had already been expended.

The Organization of MISO States (OMS) also protested the incentive request. The Commission participated with other state commissions in formulating the OMS protest. Both protests were effective in challenging ATXI's request for additional ROE incentives. FERC concluded on February 13, 2018 that ATXI failed to show substantial additional risk for either the Mark Twain or the Illinois Rivers project and denied the request. A rehearing request by ATXI in this case is currently pending.

Regional Electric Transmission Activity

The Commission regularly participates in and contributes to the meetings of the two RTOs active in Missouri and that serve Missouri investor-owned utilities, municipal utilities and electric cooperatives: MISO and SPP.

RTOs are organizations established by FERC Order 2000 and are mandated by FERC to operate the interstate Electric Transmission Grid (the Grid), plan upgrades and expansions of the Grid, manage wholesale bulk electric markets through which utilities buy and sell electricity to one another and ensure reliable supplies of electric power. The Commission participates in RTO activities to ensure Missouri electric ratepayers and customers receive reliable and safe services at reasonable rates due to these activities.

Southwest Power Pool (SPP)

There are three Missouri jurisdictional electric utilities that are members of SPP: KCP&L, GMO and Empire. City Utilities of Springfield and many other Missouri municipal utilities and cooperatives are also members of or participate in SPP and its bulk wholesale energy markets.

SPP Regional State Committee (RSC)

Commissioner Stephen Stoll's term as RSC President ended in December 2017, a position he held since January 1, 2017. Commissioner Scott Rupp was appointed as Missouri's representative to the RSC upon Commissioner Stoll's departure.

Both Commissioners help provide guidance to and set the agenda of the RSC as it provides state-regulatory commission guidance to the SPP board of directors. The SPP delegated to the RSC authority to set resource adequacy and transmission cost recovery policy oversight, and authorizes the RSC to compel SPP to submit filings before FERC when it deems it necessary. The Commission Staff assists the Commission in its oversight of, and participation in, SPP working groups and transmission planning activities.

Regional Cost Allocation Review (RCAR)

Commissioner Stoll chaired the SPP's Regional Cost Allocation Review Task Force (Taskforce) through December 2017. After completing a 24-month SPP-region wide cost allocation review in July 2016, the Taskforce undertook a "Lessons Learned" process to aid future RCARs.

The RCAR process requires SPP to periodically review the fairness of SPP's Highway/By-way transmission cost allocation method and make recommendations to the SPP Board of Directors to remedy any inequities found in the review. In the review ending in July 2016, the RCAR Taskforce did not find an unfair under-allocation of transmission benefits or over-allocation of shared transmission costs compelling remediation. The Taskforce did identify the City of Springfield, Missouri as warranting additional analysis due to Springfield's monetized benefits being less than 80% of the city's costs. This helped lead to the eventual proposal of the Brookline and Morgan projects discussed later in this report.

As part of the "Lessons Learned" process, the Taskforce decided in FY 2018 to perform the RCAR no less than every six years, a change from the previous standard of no less than every three years. This change was filed at FERC in Docket No. ER17-2229 and was approved on September 29, 2017.

Regional State Committee's Cost Allocation Review Working Group (CAWG)

The Cost Allocation Review Working Group (CAWG) is a state-employee working group that reviews, monitors and performs analysis of any and all SPP proposals and practices, and reports and makes recommendations to the RSC and its president. The CAWG also monitors and participates in other SPP stakeholder working groups to ensure adequate state oversight of regional and national issues contemplated by SPP.

Currently, the CAWG chair coordinates its activities with the SPP staff and the RSC sets the CAWG agenda. In the first half of FY 2018, CAWG was chaired by Commission Staff as a result of Commissioner Stoll's term as RSC president, as the CAWG chair comes from the same state as the RSC president.

Commission Staff working with the CAWG previously directed a 2-year review of the SPP "Safe Harbor" transmission cost sharing protocol in early 2017, and found that the protocol continues to be appropriate. The "Safe Harbor" protocol impacts how the costs of certain transmission projects are allocated across the SPP footprint. In FY 2018, CAWG and the RSC under Missouri leadership developed guidelines for limited annual reviews of the "Safe Harbor" protocol, with CAWG concluding its first limited review in June 2018, and RSC approval in July 2018.

Commission Staff working with the CAWG also monitors SPP's Supply Adequacy Working Group (SAWG) which was established to set and ensure satisfaction of SPP's footprint wide generation capacity reserve requirements. The function of the SAWG is to find means to ensure sufficient generation is online at all times, to provide electrical energy to meet all foreseeable requirements while reducing wholesale energy costs when possible. SPP recently reformed reserve requirements criteria to be based on electric load and subsequently found it could reduce the number of megawatts of generating capacity required to be held in reserve for system reliability from about 13% to 12%, which is valued at about $1.3 billion.

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

Mountain West Transmission Group

SPP explored the possibility of expanding its footprint to the West with the addition of several utilities during 2017-2018, which led to much discussion, negotiation sessions, and meetings on behalf of all members and state regulatory commissions involved with SPP with those proposed new members. The Commission and Commission Staff actively participated in this process, which is currently on hold due to the largest proposed new member pulling out of the negotiations on April 20, 2018.

Midcontinent Independent Transmission System Operator (MISO)

There is one Missouri jurisdictional electric utility that is a member of MISO: Ameren Missouri. The City Utilities of the Columbia Water and Light Department is also a member of MISO and participates in its bulk wholesale energy markets.

OMS Leadership Participation

Commissioner Daniel Hall currently serves on the Organization of MISO States (OMS) Board of Directors, was elected vice-president in October 2017 and is the incoming president for calendar year 2019. As Vice-President, Commissioner Hall served on the OMS Executive Board, assisting with the development of OMS agendas and strategic priorities; was the Commissioner-liaison to the OMS Distributed Energy Resource Working Group; and served as the OMS lead-representative to MISO's Advisory Committee, which directly advises the MISO Board of Directors. Commissioner Hall also served on the MISO Nominating Committee, which is responsible for reviewing MISO Board of Directors candidates.

In the spring of 2018, Commissioner Hall commenced an effort to bring together the state commissioner-members of the Organization of MISO States and the Southwest Power Pool's (SPP) Regional State Committee to review long-standing seams issues between MISO and the SPP, which issues have impacted states on the MISO/SPP seam, including Missouri. This joint-effort brought enhanced access to federal energy markets and cost savings to Missouri investor-owned and municipal electric utility ratepayers. Additionally, Commissioner Hall coordinated Missouri's requirements with development of the OMS recommendations to MISO's new interregional market efficiency transmission cost allocation policies which are to be submitted to FERC for approval. Commissioner Hall led an inquiry by OMS into whether continued application of federal electric transmission rate incentives remain appropriate and are achieving the goals for which they were created.

In his role as Commissioner-liaison to the OMS Distributed Energy Resource Working Group Commissioner Hall also led the OMS effort to study and plan for possible financial and physical system reliability impacts of items such as residential solar systems, energy efficiency programs, demand response programs, and “behind the meter” generators.

SEAMS PLANNING

Seams Transmission Projects in SPP and MISO

SPP and the Missouri-based Associated Electric Cooperatives, Inc. (AECI) have agreed to coordinate upgrades and enhancements of their electrical transmission systems in the Springfield area that will enhance City Utilities of Springfield’s ability to serve its customers reliably and at reasonable rates.

SPP filed a proposal before FERC in August 2017 (FERC Docket Nos. ER17-2256 and ER17-2257) to share the costs of: (1) installing a 345 Kilovolt transformer at AECI’s Morgan substation, northwest of Springfield; and (2) upgrade the capacity of the transmission line from Morgan to AECI’s Brookline substation. FERC rejected these filings without prejudice on October 6, 2017.

FERC’s rejection led to SPP approving the Brookline substation improvement in FY 2018 as a project that SPP would completely fund. Additionally, SPP has worked to prepare to refile the Morgan Transformer project and cost sharing with AECI and within SPP at FERC. As of the end of FY 2018, SPP had not yet refiled its proposal on this issue.

Missouri Commissioners and Staff have worked for multiple years to support such interregional planning efforts. Missouri is at the edge of three separate transmission planning regions: SPP, MISO, and AECI. Supporting these interregional planning efforts brings added value to Missouri utilities and ratepayers. In FY 2018, Missouri Commissioners worked to have SPP RSC Commissioners and OMS Commissioners meet to attempt to improve SPP-MISO interregional planning processes.

Funding challenges become apparent when two or more transmission planning regions, such as SPP and AECI or SPP and MISO, contemplate construction and cost sharing of proposed transmission projects outside of their respective regional transmission planning processes.

SPP and MISO also performed the first portion of an interregional planning study during FY 2018. The conclusion of this SPP-MISO study resulted in a decision not to look for potential interregional projects, but instead to look for process improvements for future SPP-MISO interregional studies. It is expected that SPP and MISO will file these process improvements in 3Q or 4Q 2018. Missouri Commissioners and Staff will continue to work with SPP and MISO on their interregional planning efforts.

Presentations made annually to the Commission by MISO and SPP

Pursuant to Commission requests, both MISO and SPP representatives make periodic presentations and provide updates at Commission Agenda sessions. On August 30, 2017 and July 25, 2018, both SPP and MISO updated the Commission in an open Agenda meeting and plans are being made for presentations in FY 2019. These meetings allow Commissioners to get a better understanding of how decisions made by MISO and SPP impact Missouri utilities and ratepayers. These meetings also allow Commissioners to ask MISO and SPP representatives detailed questions about how Missouri data was reported on a region-wide basis and how this information is being used.

WATER AND SEWER DEPARTMENT

The main functions of the Water and Sewer Department (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 Department is investigating customer complaints regarding quality of service issues. Department personnel spend many hours in the field investigating complaints and working with the customer and the company to find solutions to customer concerns.

There are approximately 65 regulated water and/or sewer companies in 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 Department also works very closely with DNR whose responsibilities include ensuring that utilities are complying with the applicable federal and state environmental and water quality laws and regulations.

Missouri-American Water Company (MAWC) (Case No. WR-2017-0285)

At the end of fiscal year 2017, MAWC filed a rate case with the Commission. In that case, MAWC requested the use of a future test year. Typically, Missouri utility companies use a historic test year, meaning the audit looked at a prior

12-month period's data. In this case, MAWC proposed to look forward by using a historic year's expenses and then estimating what the expenses would be in the future.

MAWC also requested a Revenue Stabilization Mechanism (RSM). This regulatory mechanism would have allowed MAWC to add a surcharge to customer bills if revenue was less than what was authorized by the Commission. These types of mechanisms are intended to address declining usage among customers.

On May 2, 2018, the Commission issued its Report and Order in this case as well as approving Stipulation and Agreements presented to it by the parties. The Agreements settled the major issues of overall revenue requirement increase, which included acknowledgement of the Federal Tax Cuts and Jobs Act of 2017, but did not include the RSM or historical test year concepts. The overall annual revenue requirement increase approved by the Commission was approximately $24 million.

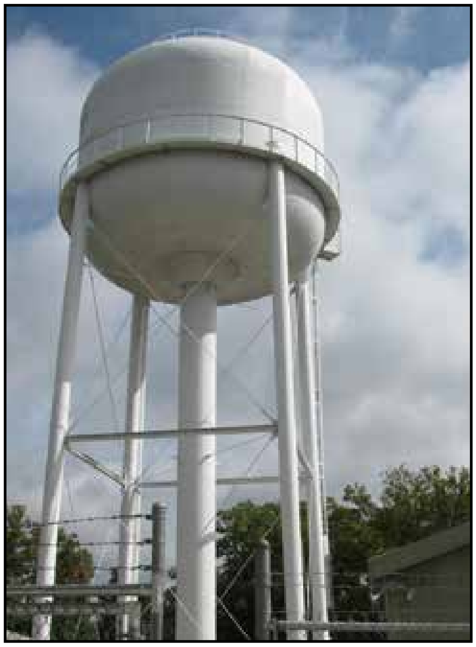
The Agreements also included an inclining block rate design for MAWC's Mexico service territory. In the Report and Order, the Commission re-aligned MAWC's service territories for rate purposes. Regarding water rates, the St. Louis County service area now has its own rate and the remaining service areas throughout the state have a separate rate, excluding the Mexico service area which is operating under a pilot inclining block rate.

New rates took effect on May 28, 2018.

Small Rate Cases

During FY 2018, four small water and/or sewer companies filed for rate requests. (A small water or sewer utility is a utility that serves fewer than 8,000 customers.) Further, four small utilities that filed for rate cases in FY 2017 had rates approved by the Commission in FY 2018.

Receivership Actions



When the Commission determines that an owner is unwilling and/or unable to provide safe and adequate service, the Commission can place the utility under the control of a receiver. It is the receiver's general duty to operate the system in a manner that provides safe and adequate service and to prepare the utility for 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 FY 2018, two utilities that were in receivership, Missouri Utilities and P.C.B., were purchased by qualified utilities. Missouri Utilities was purchased by Elm Hills Utility Operating Company (Case No. SM-2017-0150) and P.C.B. was purchased by the Jefferson County Public Sewer District (Case No. SM-2018-0131).

Confluence Rivers Utility (Case Nos. WM-2018-0116 and SM-2018-0117) is proposing to purchase Mill Creek, M.P.B. and Gladlo Water and Sewer which, if approved, would remove those companies from receivership status.

Lead Report – Follow up

In April 2017, the Department finalized a report on lead in Missouri drinking water. The report largely focused on Commission regulated entities and did not delve into any review of major municipal systems such as St. Louis City or Kansas City.

Generally, the report indicated that the main potential threat for lead to be found in the drinking water system is through contact with lead-based service lines and/or lead based plumbing fixtures in the home, with the service line being a larger issue. Most homes built after the 1950s did not have lead service lines installed. However, any home built prior to the 1990s may have some lead-based plumbing fixtures. Even though there may be lead-based infrastructure at the home, water supplies are treated such that the water is non-corrosive and any lead cannot leach into the drinking water. At this time, there are no Commission regulated systems not meeting state and federal guidelines for lead contamination.

On May 12, 2017, MAWC filed an application with the Commission (Case No. WU-2017-0296) seeking approval for an accounting authority order for its lead service line replacement program. According to its application, MAWC has an active main replacement program. In its application, MAWC requested to replace lead-based customer-owned service lines when these lines are found during main replacements. A hearing was held September 27-28, 2017.

The Commission approved MAWC's request in November, 2017. In MAWC's subsequent rate case, the Commission allowed all customer-owned service lines replaced by MAWC to be recovered via a 10-year amortization. Any further replacements will be considered in MAWC's future rate cases.

Needed Investment

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

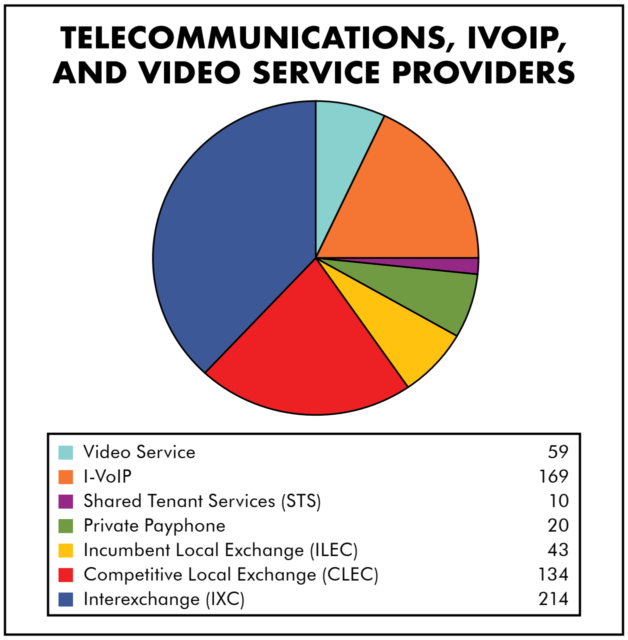
TELECOMMUNICATIONS

Commission Authority/Responsibilities

The Commission's authority over telecommunications has changed over the years, with jurisdiction 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.

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. In general, any landline or wireless company operating in Missouri wanting to receive financial support from the 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 also 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. A total of 65 companies have ETC status in Missouri.



High-Cost Support Program: The high-cost program 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 such as rural and sparsely-populated areas. In Missouri, 43 landline companies and three wireless companies received approximately $172.9 million in federal high-cost support in 2017.

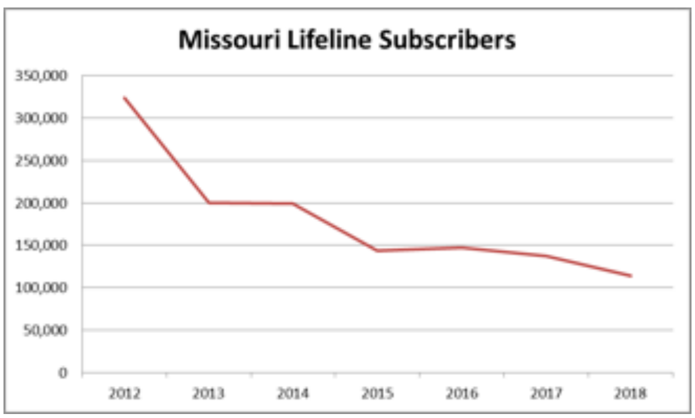
The FCC relies on state commissions to annually certify companies receiving high-cost support payments. This certification process is intended to ensure a carrier's high-cost support was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance 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. In addition, Staff annually conducts on-site visits evaluating a company's facilities and overall operations.

Lifeline Program: The Lifeline program is designed to provide discounted phone service to qualifying low-income consumers. The program has been in existence since 1985 and is overseen by the FCC in partnership with the states.

Landline and wireless companies participating in the Lifeline program currently receive federal USF funding of $9.25 per month for each Lifeline subscriber. Missouri provides an additional $6.50 per month but this amount only applies to landline voice Lifeline service. Federal financial support for the Lifeline program is available for a broadband-only service. Missouri support for the Lifeline program is limited to voice service or a package of services that includes voice service.

Consumers participating in the following programs are eligible for the Lifeline program: Missouri HealthNet, food stamps, supplemental security income, federal public housing and Veterans and Survivors Pension Benefit program. Consumers with a household annual income at or below 135% of the federal poverty level are eligible for the Lifeline program. Plans are being made to route all Lifeline enrollments through a national verifier.

As of June 2018, there were approximately 9.6 million Lifeline subscribers nationwide. Missouri has 114,183 Lifeline subscribers which is a decrease from the prior year of 137,741 Lifeline subscribers.



Disabled Program: The disabled program is similar to the Lifeline program in that it provides discounted phone service to consumers participating in the following programs: veterans' administration disability benefits, state blind pension, state aid to blind persons, state supplemental disability assistance payments, or federal social security disability program.

In contrast to the Lifeline program, the disabled program is solely funded through the Missouri USF. The disabled program is limited to landline providers and offers a $6.50 a month discount. Approximately 363 subscribers were participating in the program at the end of June 2018 versus 566 subscribers a year earlier.

Funds Administered by the Commission

Missouri Universal Service Fund: The Missouri Universal Service Board, consisting of the Commission and OPC, oversees the Missouri USF pursuant to Section 392.248, RSMo. Commissioner Bill Kenney serves as President of the Universal Service Board. The Missouri USF currently provides funding to landline carriers for the provisioning of discounted voice service to qualifying Lifeline and disabled customers. The Missouri USF is funded through a percentage-based assessment on retail net jurisdictional revenues of landline telecommunications companies and interconnected VoIP providers. This assessment is ultimately paid for by consumers and shows up as the Missouri USF surcharge on monthly bills. Fund administration is handled by a third party selected through a competitive bid process which was conducted during FY 2017.

The Missouri USF fund balance has increased from $2,254,072 to $2,440,922.81 during the July 2017 through June 2018 time period. The Missouri USF assessment is .0010.

Relay Missouri Fund: The Commission 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 equipment distribution program. The Commission contracts with a party to provide relay and CapTel services. The existing contract was rebid in 2017 and awarded to Sprint. During the past year the Relay Missouri program was recertified for another five years as being compliant with federal relay requirements. Missouri Assistive Technology administers the Telephone Access Program.

The Relay Missouri Fund is funded by a surcharge applied to landlines with basic local telecommunications service or interconnected VoIP service. The Commission reduced the Relay Missouri surcharge from $.06 to $.04 effective April 1, 2017. The Relay Missouri Fund balance was $3,593,201 as of June 2018. Relay and CapTel usage paid by the fund has declined as users transition to IP-based relay and CapTel services which are supported through a corresponding federal fund.

Pricing Reforms

Pricing flexibility has been available for all companies for several years depending on the type of service or competitive status; however, 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 Commission or by maintaining rates on a company's website. Currently 70 companies maintain their rates on their website.

Telephone Numbering

The Commission 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 Commission also monitors national activities that impact telephone number administration in Missouri. These activities serve to meet expectations that telephone numbers are utilized efficiently as the Public Switched Telephone Network continues its evolutionary migration to an Internet Protocol-based successor network.

The Commission 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 Commission to examine and verify telephone numbering needs involving individualized company-specific situations. In the 2018 fiscal year, the Commission was asked to examine and make determinations in two situations.

The Commission continues its efforts to conserve telephone numbers. Those efforts have enabled Missouri to delay the implementation of new area codes in the state. The following table shows Missouri’s area code projected exhaust dates as well as the percentage of available telephone numbers currently assigned to carriers:

AREA CODE	PROJECTED DATE OF TELEPHONE NUMBER EXHAUSTION*	PERCENTAGE OF NUMBERS ASSIGNED TO CARRIERS
314	2nd quarter of 2024	58%
417	1st quarter of 2035	36%
573	4th quarter of 2024	30%
636	*Exhaust date exceeds 30 years*	39%
660	*Exhaust date exceeds 30 years*	26%
816	3rd quarter of 2025	48%

*Forecast as approved by the FCC in April 2018. The exhaust dates are reviewed twice a year by numbering authorities.

Rulemakings

During the past year the Commission opened two dockets to consider rules currently applicable to telecommunications companies and IVoIP providers. The primary purposes of the rulemakings are to simplify rules and eliminate unnecessary rules.

CUSTOMER EXPERIENCE DEPARTMENT

On November 9, 2017, the Commission announced the creation of the Customer Experience Department (CXD) within the Commission Staff Division. The CXD provides testimony and recommendations on customer experience issues before the Commission.

Defining customer experience varies by industry and organization but the one invariable definition is that customer experience focuses on the customer’s overall journey or experience with a company. An effective customer experience business strategy takes a holistic assessment of customer contact at every aspect of an organization.

The Staff of the CXD consists of Utility Management Analysts and Utility Policy Analysts. CXD Staff participated in a variety of cases and audit projects during FY 2018 including formal complaints, general rate cases, MEEIA cases, acquisitions, renewable energy proposals, small utility rate cases, investigatory cases, tariffs, rulemakings and working groups.

Staff performed service quality analysis during FY 2018 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 Staff an opportunity to recommend improvements, and in some cases compliance, in a variety of areas including customer billing, payment remittance, credit and collections, complaint handling, business office operations and record retention.

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

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

CXD Staff receives and reviews quality of service reports from various companies as a result of mergers and rate cases. These reports contain information regarding customer service, including data on staffing levels, call center indicators such as average speed of answer, abandoned call rate, and the number of billing estimates performed. Staff monitors various aspects of customer experience including call center performance of the state's large regulated natural gas and electric companies as well as MAWC.

Consumer Outreach and Education:

The Commission attends a number of outreach events every year with the goal of educating consumers on important utility issues. Communication and collaboration with various organizations in the state is a key part of the Commission's outreach and education mission.

During the 2018 fiscal year, the Commission attended approximately 57 different consumer outreach and education events in the state. Those venues included senior, health, career, back to school and resource fairs, energy forums and local public hearings.

The Commission continues to meet with consumers across the state on topics such as the regulatory process, energy efficiency and consumer rights and responsibilities.

At these outreach and education events, the Commission provides materials on a number of important topics such as: how to be energy efficient, budget billing, a consumer's bill of rights, special protections that are available to consumers during the cold winter and hot summer months, utility payment arrangements and customer notice prior to a discontinuance of service.

These community events also give the Commission an opportunity to educate consumers on who we are and what the Commission does. Some of these events attract thousands of consumers which gives the Commission an opportunity to talk with consumers in a large group setting on key issues. Other venues give the Commission an opportunity to meet one-on-one with consumers and address their particular questions or issues.

The Commission is committed to increasing its visibility and working with others across the state to help consumers better understand the utility issues of the day.

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 8,500 customer-related contacts in 2018. Contacts include complaints, inquiries regarding rules and regulations, information requests, non-jurisdictional requests and public comments related to pending utility cases.

Consumer Services, the Customer Experience Department and Public Information Staff were actively involved in consumer education efforts throughout the state during the 2018 fiscal year.

MANUFACTURED HOUSING AND MODULAR UNITS PROGRAM

The Manufactured Housing and Modular Units Program (Program) 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 includes 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. 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**.

The Program hosted the 2018 HUD regional meeting in St. Louis with representatives from other State Administrative Agencies, third party inspection companies, and HUD staff from 18 different states. Commissioner Scott Rupp provided opening remarks at the event and the meeting provided training and industry discussion.

Oversight and Regulation

Structures that are not properly installed may result in very expensive repairs which can take weeks to complete. Most of today's homes and commercial units are multi-section structures installed on crawl spaces or basement foundations or below frost grade footings. Many of these structures have high pitched hinged roofs and require specialized equipment to install.

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

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.

During the 2018 fiscal year, the Program licensed 124 manufacturers, 197 retail dealers, and 73 installers. Field Staff conducted a total of 22 consumer complaint inspections.

Manufactured Homes & Modular Unit Sales

Approximately 1,188 new manufactured homes and new modular units were sold in Missouri during the 2018 fiscal year (up 1.8% from FY 2017). In addition, 1,002 used homes were sold in the state.

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

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

The use of modular classrooms has become more and more common across the state to accommodate expanding school districts. Program Staff inspects these modular classrooms to ensure a safe learning environment (inspecting the site, foundation, connection of units, anchoring, access and egress, etc). Recently, Staff created a Modular Classroom Informational Bulletin to assist school districts who have little or no experience with modular classrooms.

Recent Projects

Earlier this year, Commission regulations related to manufactured homes and modular units were updated. Some of the major changes include updating the codes used to regulate modular units, and changing the reporting requirements to allow for more timely inspection of new unit installation.

STATISTICS FOR FISCAL YEAR 2018

Registered Manufacturers	124
Registered Dealers	197
Registered Installers	73
Homes Sold (New & Used)	2,190
Consumer Complaint Inspections	22
On-Site Inspections	465
Dealer Lot Inspections	23
Dealer Lot Investigations	7
Modular Unit Seals Issued	730
Modular Unit Plans Approved	383
Installer Decals Issued	1,265

RATE CASES DECIDED DURING THE 2018 FISCAL YEAR

NATURAL GAS

Date of Order	Case No.	Company	Rate Request	PSC Decision
03/07/18	GR-2017-0215 & GR-2017-0216	Spire, Inc.	$ 108.4 million	($15.8 million)*
06/06/18	GR-2018-0013	Liberty Utilities	$ 7.5 million	$4.6 million*

*Reflects the change in the federal corporate income tax rate from 35% to 21% under the federal Tax Cuts and Jobs Act of 2017.

WATER AND SEWER

Date of Order	Case No.	Company	Rate Request	PSC Decision
07/12/17	WR-2017-0139	Stockton Hills Water Co.	$ 45,236	$ 10,117
07/26/17	WR-2017-0110	Terre Du Lac Utilities	$ 142,700	$ 82,724
02/07/18	WR-2017-0259	Indian Hills Utility	$ 750,000	$ 674,500
05/02/18	WR-2017-0285	Missouri-American Water	$ 74.6 million	$ 24 million*
05/09/18	WR-2017-0343	Gascony Water Company	$ 15,000	$ 10,400

*Reflects the change in the federal corporate income tax rate from 35% to 21% under the federal Tax Cuts and Jobs Act of 2017.

ELECTRIC STATISTICS
Calendar Year 2017 (Missouri Jurisdictional)

Company Name	Operating Revenues	MWhs Sold	Residential Customers	Total Customers
Empire District Electric Co.	$ 466,785,495	4,976,153	129,017	152,953
Kansas City Power & Light Co.	$ 928,575,212	8,289,428	251,503	284,495
KCP&L-GMO	$ 763,543,151	7,931,919	283,563	323,470
Ameren Missouri	$2,798,750,844	31,597,238	1,053,590	1,215,780
Totals:	**$4,957,654,702**	**52,794,738**	**1,717,673**	**1,976,698**

Source: MoPSC FERC Form 1, 2017 Annual Reports (Missouri Jurisdictional)

STEAM STATISTICS
Calendar Year 2017 (Missouri Jurisdictional)

Company Name	Operating Revenues	MMBtus Sold	Residential Customers	Total Customers
KCP&L-GMO	$ 15,068,615	2,559,993	0	5
Veolia Energy Kansas City, Inc (1)	$ 18,442,091	1,639,135	0	50
Totals:	**$ 33,510,706**	**4,199,128**	**0**	**55**

Source: 2017 Annual Report

(1) Reported in MLB's

NATURAL GAS STATISTICS
Calendar Year 2017 (Missouri Jurisdictional)

Company Name	Operating Revenues	Mcfs Sold	Residential Customers	Total Customers
Liberty Utilities	$ 44,316,836	6,862,739	46,376	53,293
Empire District Gas Co.	$ 35,652,054	7,194,929	37,628	43,097
Spire Missouri East (1)	$ 682,132,249	79,677,373	610,102	651,098
Spire Missouri West (2)	$ 457,005,043	69,746,526	458,038	513,178
Summit Natural Gas Co.	$ 28,429,649	2,796,513	17,814	18,373
Ameren Missouri	$ 119,985,427	16,687,072	116,951	130,417
Totals:	**1,367,521,258**	**182,965,152**	**1,286,909**	**1,409,456**

Source: MoPSC FERC Form 2 2017 Annual Reports (Missouri Jurisdictional)

(1) Formerly Laclede Gas Company
(2) Formerly Missouri Gas Energy, a division of Laclede Gas Company

COMBINATION WATER AND SEWER COMPANIES FISCAL YEAR 2018*

COMPANY NAME	WATER CUSTOMERS	SEWER CUSTOMERS
188 North Summit, LLC	60	60
Branson Cedars Resort Utility Company LLC	54	54
Calvey Brook (2)	10	10
Cedar Green Land Acquisitions	54	54
Elm Hills Utility Operating Company	152	332
Foxfire	255	252
Gladlo Water & Sewer Co. (1) (2)	70	60
Hillcrest Utility Operating Company, Inc.	239	240
Holtgrewe Farms Water Co., LLC	25	0
Lake Northwoods Utility Co.	17	17
Liberty Utilities	1,956	416
Lincoln County Sewer & Water, LLC	180	181
Missouri American Water Co.	454,766	12,682
Osage Water Co. (1)	6	6
Port Perry Service Co. (2)	335	234
Rogue Creek Utilities (1)(2)	83	80
Roy L Utilities, Inc. (2)	31	56
S K & M Water & Sewer Co.	290	153
Terre Du Lac Utilities Corp.	1,304	1,282
Valley Woods Utility, LLC (2)	40	33
Willows Utility Co. (2)	151	124
Total Number of Customers	**460,078**	**16,326**

*Active Companies as of 6/30/18. Customer numbers based on most recent data available.
(1) Operating Under Receivership
(2) Sale / Transfer Pending

STAND ALONE WATER AND SEWER COMPANIES FISCAL YEAR 2018*

NAME OF WATER COMPANY	CUSTOMERS
Arglye Estates Water Supply	52
Bilyeu Ridge Water Company, LLC (2)	55
Empire District Electric Co.	4,512
Environmental Utilities	21
Evergreen Lake Water Co. (2)	52
Franklin County Water Co.	189
Gascony Water Co., Inc.	175
Indian Hills Utility Operating Company, Inc.	714
Lakeland Heights Water Co.	74
Middlefork Water Co. **	2
Midland Water Co. (2)	94
Moore Bend Water Utility, LLC (2)	88
Oakbrier Water Co.	56
Raytown Water Co.	6,626
RDE Water Company	1,138
Ridge Creek Water Company, LLC (1)(2)	136
Riverfork Water Co. (2)	143
Smithview H2O Co. (2)	102
Stockton Hills Water Co.	165
Taney County Water, LLC (2)	512
Village Greens Water Co.	81
Whispering Hills Water Co.	53
Whiteside Hidden Acres, LLC	33
Total Number of Customers	**15,073**

NAME OF SEWER COMPANY	CUSTOMERS
Cannon Home Association	114
Central Rivers Wastewater Utility, Inc.	295
M.P.B. Inc. (1) (2)	216
Mid MO Sanitation	29
Mill Creek Sewer Co. (1)(2)	68
North Oak Sewer	81
Raccoon Creek Utility Operating Company***	497
Taney County Utilities (2)	28
Taneycomo Highlands	31
TBJ Sewer Systems, Inc.	68
Timber Creek Sewer Co.	2,078
TUK LLC	27
Warren County Sewer Co.	34
Total Number of Customers	**3,566**

*Active Companies as of 6/30/18. Customer numbers based on most recent data available.
**Middlefork Water Company provides water to Grant City and Stanberry which buy the water wholesale to provide to approximately 2,100 customers.
***Company formed from acquisition of Village Water & Sewer, West 16th Street, and WPC Sewer Co.
(1) Operating Under Receivership
(2) Sale / Transfer Pending

YEAR-IN-REVIEW

AUGUST 16 Public Service Commission denies Grain Belt Express request for a certificate of convenience and necessity to construct, own, operate and maintain a high voltage, direct current transmission line and associated facilities in eight Missouri counties.

AUGUST 31 GPE, KCP&L, GMO and Westar file a joint application with the Public Service Commission asking the Commission to approve a transaction in which Westar and GPE will merge through the formation of a new holding company and the exchange of stock by shareholders of both Westar and GPE.

SEPTEMBER 19 Public Service Commission approves 188 North Summit, LLC's request to purchase the water and sewer assets of Seges Partners Mobile Home Park, LLC.

SEPTEMBER 19 Public Service Commission approves an agreement which authorizes Missouri Utilities Company to transfer its water and sewer system assets to Elm Hills Utility Operating Company, Inc.

SEPTEMBER 27 Public Service Commission opens working case to gather information and facilitate discussion regarding possible amendment to its rules related to cogeneration and net metering.

SEPTEMBER 29 Liberty Utilities files a natural gas rate case with the Public Service Commission seeking to increase annual natural gas revenues by approximately $7.5 million, of which approximately $500,000 is already being recovered from customers through the Infrastructure System Replacement Surcharge (ISRS).

NOVEMBER 1 Public Service Commission's Cold Weather Rule period begins.

NOVEMBER 9 Public Service Commission announces the creation of a Customer Experience Department.

JANUARY 3 Public Service Commission opens working case regarding the effect of the 2017 tax cuts on Missouri regulated utilities.

JANUARY 10 Public Service Commission approves agreement which grants a certificate of convenience and necessity to ATXI to build, operate and maintain a 345-kV electric transmission line from Palmyra, Missouri to the Iowa border and an associated substation in Kirksville, Missouri. The transmission line is known as the Mark Twain Transmission Line Project.

JANUARY 25 Public Service Commission authorizes the Jefferson County Public Sewer District to purchase the sewer system assets of P.C.B., Inc. through P.C.B.'s court-appointed receiver Utility Management of Missouri, LLC.

JANUARY 30 KCP&L files an electric rate case with the Public Service Commission seeking to increase annual electric revenues by approximately $16.4 million (which includes the rebasing of fuel for the Fuel Adjustment Charge).

JANUARY 30 GMO files an electric rate case with the Public Service Commission seeking to increase annual electric revenues by approximately $19.3 million (which includes the rebasing of fuel for the Fuel Adjustment Charge).

FEBRUARY 21 Public Service Commission issues its decision in natural gas rate cases filed by Spire Missouri which reduces net annual natural gas revenues for Spire Missouri (formerly Laclede Gas Company and Missouri Gas Energy) by approximately $15.8 million. Spire Missouri customers are the first customers of a Missouri Public Service Commission regulated utility to see the benefits of the federal Tax Cuts and Jobs Act of 2017.

FEBRUARY 22

Public Service Commission establishes cases to determine impact of the 2017 federal tax cuts on customer rates. Cases were opened for Ameren Missouri (natural gas and electric), Empire, The Empire District Gas Company, GMO (steam), Veolia Energy (steam) and Summit Natural Gas.

MARCH 7

Public Service Commission establishes working case regarding the effect of recent federal tax cut legislation on regulated small water and sewer utilities in Missouri.

MARCH 8

Public Service Commission approves joint application which authorizes the sale of the water system assets of Spokane Highlands Water Company to MAWC.

MARCH 19

Public Service Commission supports national “Fix-A-Leak Week”.

MARCH 22

Public Service Commission approves applications filed by Highway H Utilities, Inc. to sell its water system assets to the City of Waynesville and its sewer system assets to Pulaski County Sewer District Number 1.

APRIL 5

Public Service Commission approves agreement which authorizes Liberty Utilities to acquire the franchise and operating assets of six water and sewer companies that are wholly-owned subsidiaries of Ozark International, Inc. The six water and sewer companies are: Bilyeu Ridge Water Company, Midland Water Company, Moore Bend Water Utility, Riverfork Water Company, Taney County Water and Valley Woods Utility.

APRIL 5

Public Service Commission observes National Safe Digging Month.

MAY 2

Public Service Commission approves agreement which authorizes MAWC to increase annual water and sewer revenues by approximately $24 million. MAWC is the first regulated water and sewer company in Missouri to adjust customer rates to reflect the federal Tax Cuts and Jobs Act of 2017.

MAY 24

Public Service Commission approves the merger of GPE and Westar.

JUNE 7

Public Service Commission opens case to adjust the electric rates of Empire under a provision of Senate Bill 564 related to the federal Tax Cuts and Jobs Act of 2017, which was passed by the Missouri General Assembly and signed into law.

JUNE 7

Public Service Commission opens case to adjust the electric rates of Ameren Missouri under a provision of Senate Bill 564 related to the federal Tax Cuts and Jobs Act of 2017, which was passed by the Missouri General Assembly and signed into law.

JUNE 7

Public Service Commission approves agreement which grants Liberty Utilities a natural gas rate increase of approximately $4.6 million. The agreement reflects the impact of the reduction in the federal corporate income tax rate from 35% to 21% resulting from the federal Tax Cuts and Jobs Act of 2017.

JUNE 27

Public Service Commission approves the transfer of water system assets of The Public Funding Corporation of the City of Ozark to the City of Ozark.

COMMISSIONERS PAST & PRESENT

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

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

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