MISSOURI PUBLIC SERVICE COMMISSION

2019
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**

WILLIAM P. KENNEY
Commissioner

VACANT
Commissioner

Missouri Public Service Commission

RYAN A. SILVEY
Chairman

SCOTT T. RUPP
Commissioner

MAIDA J. COLEMAN
Commissioner

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November 12, 2019

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, 2018 through June 30, 2019, as well as additional information for the calendar year 2019. The Commission's work this year included the following:

- **Rate Reductions Of More Than $230 Million:** In December 2017, the federal Tax Cuts and Jobs Act (TCJA) was passed and signed into law. 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. During the 2019 fiscal year, the Commission issued orders which reduced electric revenues for Ameren Missouri by approximately $166.5 million; The Empire District Electric Company by approximately $17.8 million; KCP&L-Greater Missouri Operations Company by approximately $24 million; and Kansas City Power & Light Company by approximately $21 million. In addition, The Empire District Gas Company reduced natural gas revenues by approximately $773,000 and Ameren Missouri had an interim rate reduction of approximately $1.94 million. These reductions reflect customer savings associated with the TCJA.
- **Electric Vehicle (EV) Charging Stations:** The Commission approved a pilot program for Ameren Missouri to promote fast Direct Current (DC) electric vehicle charging stations along highway corridors in an effort to expand EV adoption in Missouri. In addition, the Commission opened a working case to evaluate potential mechanisms for further development of Missouri's electric vehicle charging network.
- **Wind Generation/Solar:** The Commission approved a certificate of convenience and necessity (CCN) to Ameren Missouri to build a 400 megawatt (MW) wind generation facility in Schuyler and Adair counties. We also approved CCNs to The Empire District Electric Company to build two wind generation facilities (each up to 150 MWs) to be located in Barton, Dade, Jasper and Lawrence counties. In addition, a CCN was granted to Empire to build a wind generation facility of up to 301 MWs located in Neosho County, Kansas. The Commission granted a CCN to Ameren Missouri to build a solar facility under a pilot subscriber solar program.

- **Ameren Missouri MEEIA Program:** The Commission approved an agreement authorizing Ameren Missouri to continue promoting demand-side programs, including energy efficiency and demand response programs for residential and business customers under Cycle 3 of the Missouri Energy Efficiency Investment Act (MEEIA). Ameren Missouri's MEEIA Cycle 3 will also provide programs for low-income families.
- **Grain Belt Transmission Line:** The Commission approved Grain Belt Express Clean Line LLC's request for a CCN to construct, own, operate and maintain a high voltage, direct current transmission line which will go through the Missouri counties of Buchanan, Clinton, Caldwell, Carroll, Chariton, Randolph, Monroe and Ralls. The Commission noted the Grain Belt project will create both short-term and long-term benefits to ratepayers and citizens of the state. In addition, the project will have a substantial and favorable effect on the reliability of electric service in Missouri.
- **Transmission Line Acquisition Case:** The Commission unanimously approved a request filed by Invenergy Transmission LLC and its parent company Invenergy Investment Company to acquire ownership of Grain Belt Express Clean Line, LLC and Grain Belt Express Holding LLC.
- **Commission Moves To A New State Department:** In accordance with Executive Order 19-02 and Reorganization Plan No. 2 of 2019, the Public Service Commission is now a part of the Department of Commerce and Insurance (DCI). The Commission's move from the Department of Economic Development to DCI became official on August 28, 2019.
- **Organizational Change:** In September 2019, the Commission announced changes to the organizational structure of the agency effective October 1, 2019. The Commission continues to evaluate ways to improve the service that it provides citizens in the state and to provide a regulatory process that is fair and responsive to all parties that appear before us. The Commission now oversees five divisions: Administration, Financial and Business Analysis, Industry Analysis, Staff Counsel and General Counsel.
- **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).
- **Consumer Services:** The Commission's Consumer Services Department responded to more than 7,300 customer-related contacts during the 2019 fiscal year and worked with consumers and utility companies to resolve various issues.
- **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.
- **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

2019

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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

Website Address: psc.mo.gov

BUDGET

	Fiscal Year 2020
Public Service Commission	
Public Service Commission-Personal Service	$11,401,386
Public Service Commission-Expense & Equipment	$2,282,816
Public Service Commission-Refunds	$10,000
Total	$13,694,202
Full-Time Employees (F.T.E.)	191.00
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	$381,709
Expense & Equipment	$354,466
Program Specific Distribution (MH)	$20,000
MH-Refunds	$10,000
Subtotal	$766,175
Program Specific Distribution MH Consumer Recovery*	$192,000
Total	$958,175
Full-Time Employees (F.T.E.)	8.00
TOTAL BUDGET	**$17,148,185**
TOTAL FTE	**199.00**

*Consumer Recovery Fund Appropriation

COMMISSIONERS

Ryan A. Silvey,
Chairman

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

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

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

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

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

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

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

William P. Kenney, Commissioner

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

Commissioner Kenney was born in San Francisco, California and grew up in Southern California 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.

Daniel Y. Hall, Commissioner

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. On August 10, 2015, he was appointed Chairman by Governor Nixon and served as Chairman until September 14, 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 on its Board of Directors. He also serves as Co-Vice Chair of the NARUC Committee on Water, member of the Washington Action Committee, Vice-Chair of the Subcommittee on Education and Research and member of the Board of Directors of the National Regulatory Research Institute (NRRI). In addition, he serves as President of the Organization of MISO States. He also serves on the Financial Research Institute's Advisory Board and previously served as Chair, and is a member of the Symposium Planning Committee. He is a board member on the Public Council for the Water Research Foundation. He is an Adjunct Professor at the University of Missouri-Columbia School of Law where he teaches a class on the legislative process.

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.

Daniel Hall resigned on November 4, 2019, following the expiration of his six-year term.

Scott T. Rupp,
Commissioner

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

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

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

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

Maida J. Coleman,
Commissioner

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

In addition to her service on the MPSC, Commissioner Coleman is 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.

PSC KEY PERSONNEL

COMMISSIONERS

Ryan A. Silvey, Chairman	751-4221
William P. Kenney, Commissioner	751-7508
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
Jay Eastlick, Manager-Consumer Services	751-3160
John Hanauer, Manager-Information Services	522-2453
Kevin Kelly, Public Information Administrator	751-9300
Debbie Quick, Public Information Coordinator	522-2760
Consumer Services Toll-Free Hotline	1-800-392-4211
EFIS Toll-Free Help Desk	1-866-365-0924

GENERAL COUNSEL DIVISION

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

INDUSTRIAL ANALYSIS DIVISION

Natelle Dietrich, Director	751-7427
Dan Beck, Manager-Engineering Analysis Department	751-7522
Jim Busch, Manager-Water & Sewer Department	751-7529
Brad Fortson, Manager-Energy Resources Department	751-7528
Robin Kliethermes, Manager-Tariff/Rate Design Department	522-3782
Kathleen McNelis, Manager-Safety/Engineering Department	751-3456
Justin Smith, Manager-Manufactured Housing Department	526-2833
John Van Eschen, Manager-Telecommunications Department	751-5525
Manufactured Housing Toll-Free Hotline	1-800-819-3180

FINANCIAL & BUSINESS ANALYSIS DIVISION

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

STAFF COUNSEL DIVISION

Kevin Thompson, Chief Staff Counsel	751-6514

Area Code is 573 unless otherwise noted

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.

MARK OLIGSCHLAEGER
Director

FINANCIAL AND BUSINESS ANALYSIS DIVISION

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

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

NATELLE DIETRICH
Director

INDUSTRY ANALYSIS DIVISION

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

KEVIN THOMPSON
Staff Counsel

STAFF COUNSEL DIVISION

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

SHELLEY BRUEGGEMANN
General Counsel

GENERAL COUNSEL DIVISION

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

GENERAL ISSUES

THE FEDERAL TAX CUTS AND JOBS ACT (TCJA)

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.

The Empire District Electric Company (Empire)

Electric - A show cause case (Case No. ER-2018-0228) 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 (Case No. GR-2018-0229) was filed by Staff on February 16, 2018 regarding the impact of the TCJA on Empire's gas operations. A Stipulation and Agreement was filed on December 14, 2018, that described the tariffs Empire had filed to reflect the reduction in base rate revenue as a result of the TCJA and detailed the regulatory liability Empire agreed to establish to account for the tax savings associated with excess Accumulated Deferred Income Taxes (ADIT). The tariffs reflecting the rate reduction became effective October 24, 2018. The Report and Order approving the Stipulation and Agreement was effective February 14, 2019.

Summit Natural Gas Company

Gas - On February 16, 2018, a show cause case (Case No. GR-2018-0230) was filed by Staff regarding the impact of the TCJA on Summit Natural Gas' operations. A Stipulation and Agreement was filed on May 14, 2019, in which Summit Natural Gas agreed to defer, starting January 1, 2019, the financial impact of the TCJA reduction until Summit Natural Gas' next general rate case. Summit Natural Gas also agreed on an amortization of its excess Accumulated Deferred Income Taxes (ADIT). The Report and Order approving the Stipulation and Agreement was effective July 19, 2019.

Veolia Energy Kansas City, Inc. (Veolia)

Steam - On February 16, 2018, a show cause case (Case No. HR-2018-0232) was filed by Staff regarding the impact of the TCJA on Veolia Energy's steam heating operations. On May 10, 2018, Veolia Energy filed a general rate change application with the Commission in Case No. HR-2018-0341.

In Case No. HR-2018-0341, a Stipulation and Agreement was filed with the Commission on October 26, 2018, recommending that a $463,597 rate increase be granted for Veolia Energy. The Stipulation and Agreement stated that the agreed-upon rate increase amount took into account the ongoing reduction in Veolia Energy's federal income tax rates. The Stipulation and Agreement also required the Company to book the entire amount of Veolia Energy's excess accumulated deferred income tax (ADIT) balance as a regulatory liability and pass that amount back to its customers through a 20-year amortization. The Commission approved the Stipulation and Agreement, and Veolia Energy's new rates became effective December 1, 2018.

KCP&L - Greater Missouri Operations (GMO)

Steam - On February 18, 2018, a show cause case (Case No. HR-2018-0231) was filed by Staff regarding the impact of the TCJA on GMO's steam heating operations. Discussions are still taking place between GMO and its steam heating customers regarding the issue of flow back of the TCJA benefits in GMO's steam heating customer rates. GMO has stated in its filings before the Commission that it is hopeful a voluntary agreement on the show cause case can be reached shortly, without the need for testimony filings or hearings in this matter.

COMMISSION RULEMAKINGS

General Review of the Commission's Rules - Update

(Case No. AW-2017-0336)
The Commission opened a 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 Staff making several recommendations on rules that could be consolidated, streamlined, or otherwise improved for user-friendliness. As noted below, the Commission pursued several of Staff's working case and rulemaking recommendations.

Completed Rulemakings

(Case Nos. GX-2018-0279, AX-2018-0257, EX-2018-0389, GX-2018-0390, AX-2018-0395)
The Commission issued several Final Orders of Rulemakings that incorporated the recommendations by Staff and other stakeholders to consolidate filing requirements, remove outdated language and restructure rules for ease of reference.

Current Rulemakings

(Case Nos. EX-2019-0050, EX-2020-0006)
In current rulemakings, Staff and other stakeholders continue to make recommendations to consolidate filing requirements and simplify language.

Current Working Cases

(Case Nos. AW-2018-0393, AW-2018-0394, WW-2018-0392, GW-2020-0036)
At the direction of the Commission, Staff is considering the comments stakeholders filed and presented at workshops and will be filing new drafts in working cases regarding the Commission's Affiliate Transactions Rules. Staff filed its original draft amendments to the Affiliate Transactions Rules with the intent to incorporate water and sewer utilities, to clarify language and to streamline filing requirements. Staff is also recommending language changes and restructuring to improve user-friendliness in a working case opened to consider updating the Commission's natural gas safety rules.

STATE LEGISLATION

In 2019, there was one main piece of legislation that directly affected the regulatory scope, structure, and processes of the PSC: House Bill 355. House Bill 355 includes seven provisions: 1) sale of utilities in fourth class cities; 2) rural electric cooperative certificate of authority exemption; 3) electric vehicle charging stations; 4) Commission advisory staff; 5) Notice of Appeal filings on PSC orders and decisions; 6) trespass exemptions for tree trimming; and 7) new criminal offenses involving critical infrastructure facilities.

The most notable provisions related to the work of the PSC are electric vehicle charging stations, Notice of Appeal filings, and Commission advisory staff.

Electric Vehicle Charging Stations

House Bill 355 amends the definition of "electrical corporation" under section 386.020 to exclude municipally owned electric utilities operating under Chapter 91, rural electric cooperatives operating under Chapter 94, and persons or corporations not otherwise engaged in the production or sale of electricity at wholesale or retail that sell, lease, own, control, operate, or manage one or more electric vehicle charging stations.

The legislation also provides that if municipally-owned electric utilities or rural electric cooperatives are lawfully providing electric service to a structure outside of their respective service area boundaries, an electric vehicle charging station reasonably proximate to such structure served by such utility is considered a contiguous or adjacent addition to or an expansion of an existing structure.

Notice of Appeals

Included in HB 355, as well as in HB 192, is a change to how a Notice of Appeal on decisions and orders by the Commission is filed. Prior to this change, statute required the PSC to be the physical point of filing for a Notice of Appeal with the Appellate Court, instead of requiring appellants to file appeals directly with the Appellate Court. Once the PSC received the Notice of Appeal it would forward the Notice of Appeal to the Court by mail.

The change streamlines the process, allowing parties to file electronically with the Court from anywhere in the state and allowing parties to pay the necessary filing fees electronically. Applications for rehearing on PSC decisions and orders are not affected by this change.

Commission Advisory Staff

Also of note to the PSC, the bill makes several changes to two categories of staff that support the Commission: technical advisors and personal advisors (section 386.135). The provisions improve the commissioners' access to subject matter experts on a cost-neutral basis, while including safeguards against potential conflicts of interest for the commissioners' advisors and reaffirming ethical standards to which the advisors must be held. The bill also designates specific communications between commissioners and technical advisory staff or personal advisors as privileged and protected from disclosure under narrowly tailored circumstances—specifically case deliberations or matters that may arise during the course of proceedings before the Commission.

Photo Courtesy of Governor Parson's office

ELECTRIC

RATE CASES FILED

KCP&L-Greater Missouri Operations Company (GMO)
(Case No. ER-2018-0146)

& Kansas City Power & Light Company (KCP&L)
(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, of 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 property taxes, and reduced electric usage per customer were among the factors creating the need for increased customer rates.

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

In September 2018, a series of Stipulations and Agreements were submitted to the Commission that, in total, resolved all issues between the parties to the cases. The Stipulations and Agreements called for KCP&L to reduce its permanent rate levels by $21 million, and for GMO to reduce its permanent rate levels by $24 million.

These rate reduction amounts reflected the full ongoing impact of the lower federal tax rates from the TCJA in customer rates. In addition, the Stipulations and Agreements required both KCP&L and GMO to pass back to customers in some form the prior TCJA financial benefits received since January 1, 2018. GMO agreed to return $29.3 million of prior TCJA benefits to customers through the issuance of bill credits. KCP&L agreed to offset $38.7 million of TCJA benefits against other "regulatory assets" included in its rate base, thus ensuring its customers a lower rate base in future rate proceedings. The Stipulations and Agreements also required KCP&L and GMO to flow back to customers over time all excess Accelerated Deferred Income Taxes (ADIT) resulting from the TCJA.

The Stipulations and Agreements called for all Clean Charge Network investment made by KCP&L and GMO to date to be included in KCP&L and GMO's rate base, and also called for establishment of a new customer rate class for electric vehicle charging stations.

The Stipulations and Agreements called for establishment of a "time of use" rate for residential customers, with the service to be offered on an "opt-in" basis starting October 1, 2019. A pilot program for offering of solar subscription service was also authorized as part of the agreements.

The Commission approved the tariffs reflecting the terms of the Stipulations and Agreements on November 26, 2018, with new rates becoming effective for KCP&L and GMO on December 6, 2018.

Ameren Missouri
(Case No. ER-2019-0335)
On July 3, 2019, Ameren Missouri filed an electric rate reduction case with the Commission seeking to reduce annual electric revenues by approximately $800,000.

The Commission is scheduled to hold evidentiary hearings in the case March 2-6 and March 9-13, 2020 in Jefferson City.

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

OTHER ELECTRIC ISSUES

Ameren Missouri – Community Solar Program
(Case No. EA-2016-0207)
Ameren Missouri requested the Commission approve a Subscriber Solar Pilot Tariff program ("Community Solar" 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 and collected the needed bids to begin construction.

A second amended Stipulation and Agreement approved by the Commission on August 28, 2018, modified the original term that two 500 kW facilities will be built and permitted construction of a 1 MW facility.

Photo Courtesy of Evergy Missouri

Enrollment for the Community Solar program opened on October 15, 2018, and was fully subscribed on December 10, 2018. Construction of the 1 MW facility started in March 2019. Ameren Missouri anticipates the facility will be in-service before the end of 2019.

Ameren Missouri – Electric Vehicle Charging
(Case No. ET-2018-0132)
On February 22, 2018, Ameren Missouri filed an application, request for a variance, and a request for accounting authority order, for two new tariff programs known as "Charge Ahead". The "Charge Ahead" programs contained proposals for incentives for businesses to defray some of the cost of purchasing electric equipment and incentives to defray part of the cost of installing electric vehicle (EV) charging stations at workplaces, public places, multi-family dwelling units, and along interstate/highway corridors.

The Commission issued a Report and Order effective on February 16, 2019, that permitted Ameren Missouri to implement the interstate/highway corridor program and authorized Ameren Missouri to use a deferral accounting mechanism to track the costs associated with the corridor program.

A Stipulation and Agreement between Ameren Missouri, Staff, and Office of the Public Counsel (OPC), that permits Ameren Missouri to implement three other EV charging station programs – workplaces, public places and multi-family units – is currently pending before the Commission.

Ameren Missouri – Wind Generation Facilities

Ameren Missouri filed three applications requesting Certificates of Convenience and Necessity (CCNs) authorizing it to construct, own, and operate wind generation facilities in Missouri counties. Ameren Missouri stated in each application that the facilities were one of multiple projects needed to comply with the Missouri Renewable Energy Standard (RES).

All three facilities were to be constructed pursuant to Build Transfer Agreements (BTAs) that Ameren Missouri entered into with developers. Each application also included a request by Ameren Missouri for authority to merge special-purpose entities into Ameren Missouri, with Ameren Missouri being the surviving entity, after each project was complete.

High Prairie Project

(Case No. EA-2018-0202)
The first CCN application was filed by Ameren Missouri on May 21, 2018. The facility was to be located in Adair and Schuyler counties, provide up to 400 MWs of generation, and constructed pursuant to a BTA between Ameren Missouri and Tera-Gen, LLC. Ameren Missouri also included a request for authority to implement a Renewable Energy Standard Rate Adjustment Mechanism (RESRAM), which is a separate line item on customers' bills.

The Commission approved a Stipulation and Agreement on October 24, 2018, granting Ameren Missouri a CCN for the project and authority to merge, and issued a Report and Order effective on December 22, 2018, that permitted Ameren Missouri to use a RESRAM for RES compliance costs.

Brickyard Hills

(Case No. EA-2019-0021)
The second CCN application was filed by Ameren Missouri on October 22, 2018. The facility was to be located in Atchison County, provide up to 157 MWs of generation, and constructed pursuant to a BTA between Ameren Missouri and EDF-RE US Development, LLC. The Commission approved a Stipulation and Agreement on March 6, 2019, granting Ameren Missouri a CCN for the project and authority to merge.

On August 13, 2019, Ameren Missouri filed testimony in its third CCN case noting that the BTA for the Brickyard Hills Project had been terminated by the developer because a Network upgrade study issued by the Midcontinent Independent System Operator, Inc. (MISO) indicated that transmission network upgrade costs for the Brickyard Hills Project would be approximately $400 million.

Outlaw Project

(Case No. EA-2019-0181)
The third CCN application was filed by Ameren Missouri on May 15, 2019. The facility was to be located in Atchison County, provide up to 299 MWs of generation, and constructed pursuant to a BTA between Ameren Missouri and Enel Kansas, LLC. Ameren Missouri specified in the prior two CCN applications that the projects would be part of the MISO Regional Transmission Organization (RTO).

For the Outlaw Project, Ameren Missouri stated the decision on which RTO to connect to was not final and the project could connect to either the Southwest Power Pool (SPP) or MISO. The Commission approved a Stipulation and Agreement on August 15, 2019, granting Ameren Missouri a CCN for the project and authority to merge.

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 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, as well as an associated converter station in Ralls County, and waiving certain reporting requirements. An evidentiary hearing was held on March 20-24, 2017.

On March 28, 2017, the Missouri Court of Appeals Western District filed an opinion in an unrelated 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 if 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 that supplemental briefing and oral argument was appropriate to discuss the effect of the ATXI opinion on the Grain Belt case. An oral argument was held on August 3, 2017.

The Commission issued its Report and Order on August 16, 2017, denying Grain Belt's request 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 transferred the case to the Missouri Supreme Court on its own motion due to the general interest or importance of the question involved in the case.

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 "[t]he 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 determined that this case was a request for a *line* CCN pursuant to Section 393.170.1, that does not require first obtaining consent from affected counties. The Court noted that "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." The Court reversed the Commission's order denying Grain Belt's application for a line CCN, and remanded the case to the Commission to determine whether Grain Belt's proposed utility project is necessary or convenient for the public service.

On October 24, 2018, the Commission issued an Order Setting Supplemental Procedural Schedule and Other Procedural Requirements providing opportunity for supplemental testimony and a hearing on December 18-19, 2018. On March 20, 2019, the Commission issued its Report and Order on Remand, granting Grain Belt's application for a CCN subject to several conditions. Conditions include such things as a Missouri Landowner Protocol, including a code of conduct and the Missouri Agricultural Impact Protocol; a decommissioning fund; and provisions related to involuntary easements should Grain Belt not obtain financial commitments within five years of the date such easement rights are recorded with the appropriate recorder of deeds.

This decision was appealed and is currently pending before the Missouri Court of Appeals Eastern District.

Invenergy Transmission LLC; Invenergy Investment Company, LLC; Grain Belt Express Clean Line, LLC; Grain Belt Express Holding, LLC

(Case No. EM-2019-0150)
On February 1, 2019, Invenergy Transmission, LLC, on behalf of itself, Invenergy Investment, LLC, Grain Belt and Grain Belt Holding Company, LLC (Applicants) filed an application requesting the Commission approve a transaction involving a change in ownership of Grain Belt pursuant to a

Membership Interest Purchase Agreement (MIPA) where Invenergy Transmission will acquire Grain Belt. On June 5, 2019, the Commission issued its Report and Order. On September 11, 2019, the Commission issued its Amended Report and Order approving the acquisition subject to certain conditions including the conditions placed on Grain Belt in the Order on Remand in Case No. EA-2016-0358. A Joint Application for Rehearing was filed and is pending before the Commission.

EV working docket

(Case No. EW-2019-0229)
On February 14, 2019, the Commission issued an order opening a working case to evaluate potential mechanisms for facilitating the installation of electric vehicle charging stations. In its order, the Commission directed participants to the working docket to consider: 1) a model where the investor-owned utility owns and operates charging stations; 2) a "Make Ready" tariff proposal that includes an option to waive line extension charges; and 3) an alternate incentive program where program parameters, implementation and cost recovery are evaluated and defined in a rate proceeding. Staff held a workshop in March 2019, and various participants provided comments in the docket. In July 2019, Staff indicated that it anticipates filing a report summarizing the comments and any additional information no later than September 30, 2019.

Self-scheduling working docket

(Case Nos. EW-2019-0370, EW-2020-0032, EW-2020-0033, EW-2020-0034, EW-2020-0035)
On June 5, 2019, the Commission issued an order opening an investigation of Missouri jurisdictional generator self-commitments and self-scheduling. In its order, the Commission stated, "Both Midcontinent Independent System Operator (MISO) and Southwest Power Pool (SPP) operate day ahead energy markets designed to identify the supply of electric generation required to meet demand, and select demand-side and supply-side resources for dispatch in a manner designed to minimize overall costs to the system while meeting reliability requirements. However, in some circumstances, a market participant may choose to self-commit a particular supply-side resource for dispatch and self-schedule that supply-side resource's output and accept whatever market price results rather than awaiting market commitment and dispatch by the Regional Transmission Organization (RTO)." The Commission directed Staff to investigate the self-commit and self-scheduling practices of Missouri's investor-owned electric utilities to determine if such practices inure to the benefit of their ratepayers. Staff filed a report on its investigation on August 23, 2019.

Empire CCN Case

(Case No. EO-2018-0092)
On October 31, 2017, The Empire District Electric Company ("Empire") filed an application (Case No. EO-2018-0092) for approval of a Customer Savings Plan designed to develop up to 800 MW of wind generation in or near Empire's service territory. 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: 1) authorizing Empire to record its capital investment as utility plant in service subject to audit in Empire's next general rate case; 2) setting the depreciation rate to be utilized for the wind project; and 3) granting Empire a variance from some of the Commission's affiliate transaction rules.

On November 18, 2018, Empire filed an application (Case No. EO-2019-0118) for CCNs for two wind projects located in Missouri, Kings Point and North Fork Ridge, each comprising approximately 150 MW of wind generation. On November 18, 2018, Empire filed another application for a CCN. The third project, Neosho Ridge, will be located in Kansas and will be comprised of approximately 300 MW of wind generation.

A non-unanimous Stipulation and Agreement between many of the parties was filed on April 5, 2019. Among other things, the Agreement requested that the Commission condition the CCNs on implementation of a Market Price Protection (MPP) mechanism that seeks to provide for the sharing of risk between customers and shareholders associated with the possibility of reduced market prices and wind production.

The MPP mechanism is designed to go into effect on the first day of the month after the effective date of rates in which a wind project is first placed into rates and remain in effect for 10 years following the effective date of rates resulting from the first general rate case in which all wind projects are included in rates.

If there is a harm caused by the projects, there is a sharing mechanism with a Missouri-jurisdictional cap of $52.5 million for Empire to reduce costs to customers, while if the wind projects perform as projected, customers retain 100% of the upside benefits in the form of reduced fuel costs.

On June 19, 2019, the Commission issued its Report and Order regarding the case and adopted all of the proposed conditions from the non-unanimous Stipulation and Agreement with the exception of certain provisions related to Empire's Asbury plant.

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% 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 2019, Staff completed prudence reviews of fuel and purchased power costs and revenues included in the FACs of Empire (Case No. EO-2018-0244), KCP&L (Case No. EO-2019-0068), and GMO (Case No. EO-2019-0067). 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 Empire and GMO. However, Staff alleged imprudence by KCP&L in its management of its Renewable Energy Credits. That case is still pending, and a hearing is scheduled in August 2019.

Electric Utility Resource Planning Filings

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

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

- Empire filed a Chapter 22 triennial compliance filing on June 28, 2019 (Case No. EO-2019-0049).
- Ameren Missouri filed an annual update filing on April 12, 2019 (Case No. EO-2019-0314).

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 June 4, 2018, Ameren Missouri requested approval of demand-side programs, a technical resource manual ("TRM"), and a DSIM for a MEEIA Cycle 3 (Case No. EO-2018-0211). On October 25, 2018, the Commission approved a Stipulation and Agreement resolving this case. Ameren Missouri's MEEIA Cycle 3 went into effect on March 1, 2019.

On November 29, 2018, KCP&L requested approval of demand-side programs, a TRM, and a DSIM for a MEEIA Cycle 3 (Case No. EO-2019-0132). On February 15, 2019, the Commission approved a Stipulation and Agreement extending KCP&L's MEEIA Cycle 2 for up to nine months with a new end date of not later than December 31, 2019. KCP&L's MEEIA Cycle 3 case is still pending, and a hearing is scheduled in September 2019.

On November 29, 2018, GMO requested approval of demand-side programs, a TRM, and a DSIM for a MEEIA Cycle 3 (Case No. EO-2019-0133). On December 27, 2018, the Commission issued an Order granting consolidation of the GMO MEEIA Cycle 3 case with the KCP&L MEEIA Cycle 3 case (Case No. EO-2019-0132). GMO's MEEIA Cycle 3 case is still pending, and a hearing is scheduled in September 2019.

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

In fiscal year 2019, Staff completed its first prudence review of costs for the DSIMs of KCP&L (Case No. EO-2018-0363) and GMO (Case No. EO-2018-0364). 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 2019 DSIM prudence review, Staff found that KCP&L and GMO imprudently included certain non-MEEIA costs in its DSIM. Subsequently, the Commission ordered that $8,500 plus interest be returned to KCP&L customers and $8,500 plus interest be returned to GMO customers in the next DSIM rider rate adjustment filings.

NATURAL GAS RATE CASES

Ameren Missouri Natural Gas Rate Case

(Case No. GR-2019-0077)
On December 3, 2018, Ameren Missouri filed a permanent rate increase case for its natural gas operations in the amount of $4.26 million. At the same time and in the same filing, Ameren Missouri proposed an interim rate reduction in the amount of $1.05 million to take effect in early January 2019 in order to pass on the financial impact of the TCJA to its customers on a more accelerated basis.

This gas rate case was the first filed by Ameren Missouri in almost 10 years. The Company attributed the need to seek a change in its gas rates to the following factors: (1) increases in its plant investment and changes in depreciation rates since the last gas rate case; (2) to reflect on a timely basis the reduction in federal income tax rates in its cost of service; and (3) to enable Ameren Missouri to resume filing for Infrastructure System Replacement Surcharges (ISRS) following this rate proceeding.

On December 14, 2018, a Stipulation and Agreement was filed requiring Ameren Missouri to reduce its rates on an interim basis in the amount of $1.94 million to account for the TCJA income tax rate reduction and flow back of excess Accumulated Deferred Income Taxes (ADIT) to customers. The Commission approved the Stipulation and Agreement on December 22, 2018, with the rate reduction becoming effective on January 2, 2019.

In late July 2019, a series of Stipulations and Agreements were filed in this case that in combination resolved all issues between the parties in the permanent rate increase case. The agreements called for Ameren Missouri to increase its customer rates by a total of $940,000 above the rate level established in January 2019 after the earlier interim rate decrease. The combined impact of the initial interim rate decrease and the later permanent rate increase would be a net reduction in rates to customers of $1 million compared to the levels that existed prior to Ameren Missouri's December 2018 rate case filing.

As part of the Stipulation and Agreements entered into by the rate case parties, Ameren Missouri will implement a Volume Indifference Reconciliation to Normal (VIRN) rate rider mechanism. The VIRN is intended to allow for periodic rate adjustments outside of a general rate case to reflect the effects of increases or decreases in certain customer usage due to variations in weather, conservation or both. The VIRN will appear on customer bills as the "Delivery Charge Adjustment" or DCA.

The Commission approved the agreements in an order issued on August 21, 2019. New permanent natural gas rates will take effect on September 1, 2019.

PROCUREMENT ANALYSIS

Natural Gas ACA Activities

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

The Procurement Analysis Department conducts an annual Actual Cost Adjustment (ACA) review for each natural gas local distribution company after the LDCs close out their records following the end of each ACA period. A primary purpose of the ACA process is to reconcile the company's actual gas costs with what it charged customers (its billed revenues). In its purchased gas adjustment (PGA) filings, the company estimates its gas costs for the upcoming year. In the ACA, the estimate is reconciled with the actual prudently incurred cost of gas. In this function, the Procurement Analysis 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, 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 2018/2019 winter. These discussions were held 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

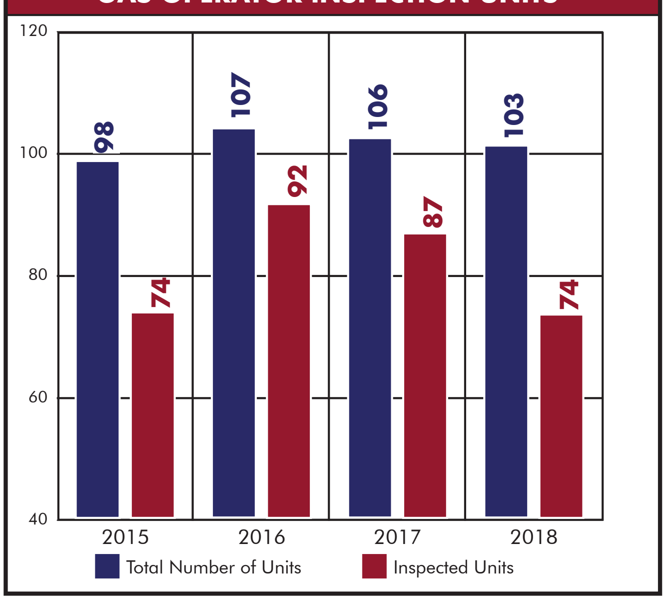
Although focused largely on natural gas ACA activities, because of its knowledge of natural gas issues, Procurement Analysis assists in the review of LDC complaint cases, certificate cases, proposed tariff changes, and natural gas rate cases. Procurement Analysis also assisted in the review of affiliated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

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

NATURAL GAS PIPELINE SAFETY PROGRAM

The Commission has safety jurisdiction over intrastate natural gas pipeline operators in Missouri 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

MISSOURI JURISDICTIONAL NATURAL GAS OPERATOR INSPECTION UNITS



Leonard Wood, one pipeline system that supplies landfill gas directly to a combined heat and power system and operators of master meter systems. For 2018, there were a total of 63 natural gas operators over which the PSC had safety jurisdiction.

In 2018, the Missouri intrastate natural gas pipeline operators were divided into 103 “inspection units” for purposes of the 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 2018 calendar year, Safety Engineering Department Staff conducted over 140 individual inspections, including comprehensive records and field compliance follow-up, construction, operator qualification, operating and maintenance procedures, distribution and transmission integrity management, control room management procedures and operations, anti-drug and alcohol misuse programs, and incident investigations.

The Commission’s natural gas pipeline safety program is carried out under a cooperative agreement with the U.S. Department of Transportation – Pipeline and Hazardous Materials Safety Administration (PHMSA). As a part of this program, the Commission has adopted the applicable federal pipeline safety regulations, including 49 CFR Parts 191, 192, 193 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 January 31, 2019.

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 55 cases at FERC during the fiscal year ending June 30, 2019. 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 seven of the cases to which it was a party in fiscal year 2019.

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 also crosses the state of Missouri.

Spire STL Pipeline

FERC Docket No. CP17-40

Spire STL Pipeline filed an application with FERC on January 26, 2017, to construct, own and operate a new interstate natural gas pipeline to serve the St. Louis 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 issued its order approving the Spire STL Pipeline certificates on August 3, 2018. Since that time, the construction of Spire STL Pipeline has been delayed because of flooding along the Missouri and Mississippi Rivers. The construction delays have led to increased costs and the pipeline completion date extending to late fall of 2019. Spire STL Pipeline has filed with FERC for approval of a rate increase reflecting the additional construction costs associated with the flooding. The Commission continues to monitor the case.

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 (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. MoGas is divided into two rate zones, Zone 1 extends from MoGas' interconnection with Panhandle and REX in Pike County to southwest of Sullivan. MoGas Zone 2 continues on to Rolla and branches out to Fort Leonard Wood in Pulaski County and to Salem in Dent County. The pipeline is approximately 263 miles in length.

The Commission, along with Ameren Services Company on behalf of Ameren Missouri and municipal customers, protested the rate increases. Spire Missouri, MRT and the Department of Defense also filed NOIs in the case.

The proposed rate increases became effective December 1, 2018. Through settlement negotiations, parties to the rate case were able to reach agreement to rates that were 38% less in zone 1 and 37% less in zone 2 when compared to MoGas' proposed rates. In addition, customers were able to enter into negotiated contracts further reducing charges. Ultimately, the settlement negotiations led to customer savings in excess of $5.6 million annually.

Enable Mississippi River Transmission (MRT)

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 at the time. MRT alleged that its rate increase was 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 also filed protests to the rate increase challenging 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 had 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 for a Discounted Cash Flow analysis for the return on equity of pass-through entities. The Commission and the 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 required MRT to 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. These changes resulted in a reduction from the proposed combined field and market zone reservation rate by 46% or from $16.0038/Dth/mo to $8.6143/Dth/mo.

Settlement negotiations were not successful, so after reaching an impasse, testimony was filed in the case on July 25, 2019, and further settlement negotiations may be conducted before the January 31, 2020 hearing commences. Many outstanding issues remain to be resolved with MRT and the potential for additional rate reductions remains. The outcome of this case will likely not be reached until mid-2020.

Southwest Gas Storage Company (Southwest Gas Storage)

FERC Docket No. RP19-257
FERC issued Order No. 849 on July 18, 2018, requiring natural gas pipeline companies to file FERC Form No. 501-G to assist it in determining which jurisdictional natural gas pipelines may be collecting unjust and unreasonable rates in light of the income tax reductions provided by the federal TCJA. The Commission subsequently filed a complaint against Southwest Gas Storage noting that information provided on its FERC Form 501-G estimated that Southwest Gas Storage was over-earning and that its rates were not just and reasonable. Panhandle is the only customer of Southwest Gas Storage. Panhandle in turn, provides its customers (including Ameren Missouri, Empire District Gas Company and Spire Missouri) access to these storage services.

The Commission intervened in this complaint case. Through negotiations with the parties to the case and FERC staff, a settlement was reached in July 2019 reducing Southwest Gas Storage's current rates by approximately $2 million annually. A common issue with the Panhandle complaint case (see below) was the treatment for ratemaking of a Negotiated Agreement between the affiliated companies, Southwest Gas Storage and Panhandle. This case was settled and the affiliated companies issue was combined into the Panhandle case for resolution.

Panhandle Eastern Pipe Line Company (Panhandle)

FERC Docket No. RP19-78
This complaint case filing by FERC was also the result of FERC's review of Panhandle's FERC Form 501-G after the issuance of its Order No. 849. FERC found that Panhandle was over-earning and that its rates were not just and reasonable because of, among other things, additional revenues it was receiving from its affiliate Rover Pipeline.

The Commission intervened in this complaint case with at least 35 other parties including Ameren Missouri and Spire Missouri. Some settlement negotiations have occurred but the complaint is currently proceeding to a hearing set for January 2020.

Texas Eastern Transmission (Texas Eastern)

FERC Docket No. RP19-343
Texas Eastern filed its rate case on November 30, 2018 asking for an approximate $364.6 million increase in revenues. The cost of service underlying the rate changes in this rate case is $1.85 billion excluding costs that are recovered through established tracker mechanisms. Texas Eastern's transportation and storage rates have not changed since Docket No. RP98-198. Texas Eastern's total plant in service reflected in this filing is $11.7 billion and stretches from Texas to New York passing through southeastern Missouri.

The Commission intervened in this rate case along with many other parties including Ameren Missouri. There have been a number of settlement conferences to date. A revised procedural schedule in this case has been set with a hearing start date of January 27, 2020.

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 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 PSC 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. In November 2018 FERC requested participants to the EL14-12 and EL15-45 proceedings to submit briefs regarding FERC's proposed changes to FERC's ROE methodology. FERC's reconsideration of its ROE methodology stems from the 2017 U.S. District of Columbia Circuit Court of Appeals decision to vacate and remand FERC's Opinion No. 531 (*Emera Maine* v. FERC). The Commission, along with the Mississippi Public Service Commission and the Missouri Joint Municipal Electric Utility Commission and the other MISO "Complaint Aligned Parties" filed initial briefs in February 2019 and reply briefs in April 2019. FERC has not yet acted as a result of the briefing and the rehearing requests filed in this case on October 28, 2016 are still pending.

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 the 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. It is unknown at this time how this appeal will affect the outcome of Docket No. EL15-45. The case is currently being held in abeyance by the U.S. District of Columbia Circuit Court. 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. As stated above in Docket No. EL14-12, additional briefs and reply briefs were filed at FERC by the Commission in 2019 to comment on FERC's proposed changes to its ROE methodology.

Commission Participation in Corn Belt Power Cooperative (Corn Belt)

FERC Docket No. ER15-2028 and

Northwest Iowa Power Cooperative (NIPCO)

FERC Docket No. ER15-2115

The Corn Belt and NIPCO cases were two of many that were filed by new members of SPP after the Western Area Power Administration (WAPA) joined SPP. The Commission participated in settlement negotiations in both the Corn Belt and NIPCO cases and had negotiated for reductions from the proposed ROEs in both cases and for improved protocol language for NIPCO, which were included in proposed settlements for FERC approval. Protocols document the transmission owner's filing requirements for providing interested parties access to information about the transmission formula rate cost of service through informal discovery and an informal and formal challenge process. The protocols also provide for a public meeting annually to discuss the FERC Form 1 inputs to a transmission owner's transmission formula rate.

The settlements in the Corn Belt and NIPCO cases led to comments and protests by parties after the settlement agreements were filed. Both cases had a similar remaining issue that required a FERC decision regarding the rate treatment of loads served under "Grandfathered" transmission agreements (GFAs). These GFAs were entered into by Corn Belt and NIPCO prior to membership in SPP. The Commission has taken no position on this issue in these cases.

FERC issued orders in both Corn Belt and NIPCO on the contested settlements in June 2019 rejecting in both cases, the settlements, and remanding the proceedings to the Chief Judge to resume hearing procedures. Because of the FERC Order, the negotiated settlement of the ROE and protocol issues are no longer valid. The June 2019 Orders also set procedural schedules in the cases with testimony filings beginning in October 2019 and hearings commencing in April 2020 for NIPCO and May 2020 for Corn Belt.

Regional Electric Transmission Activity

The Commission regularly participates in the stakeholder processes of the two RTOs active in Missouri: MISO and SPP. RTOs are organizations created by Title 16 USC §824 and FERC to operate the interstate Electric Transmission Grid (the Grid), plan upgrades to, and expansions of the Grid, manage wholesale bulk electric markets through which utilities buy and sell electricity to one another and to 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 federal activities.

Southwest Power Pool

There are three Missouri jurisdictional electric utilities that are members of SPP: KCP&L, GMO, and Empire. City Utilities of Springfield, Independence Power and Light, and many smaller Missouri municipal utilities and cooperatives are also members of, or participate in, SPP and its bulk wholesale energy markets. The SPP serves 14 states in which it manages 60,000 miles of high-voltage transmission lines and facilities; conducts ongoing future transmission expansion and upgrades planning; operates day-ahead and real-time wholesale energy markets; coordinates local electric utilities and cooperatives activities; conducts inter-RTO operations; and manages federal utility compliance services with FERC for its members.

SPP Regional State Committee (RSC)

Commissioner Scott Rupp became the Commission's representative to the SPP Regional State Committee (RSC) in January 2018. Commissioner Rupp provides Missouri perspectives and input to the RSC as it provides collective state-regulatory commission guidance to the SPP Board of Directors. The SPP delegated to the RSC authority to set resource adequacy requirements and transmission cost recovery policies oversight, and authorizes the RSC to compel SPP to submit filings before FERC when it deems it necessary. Commission Staff assist the Commission in its oversight of, and participation in, SPP stakeholder working groups and transmission planning activities.

SPP Holistic Integrated Tariff Team (HITT)

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

In FY 2018, HITT prepared a series of recommendations that will require the RSC and its dedicated working group's attention in FY 2019.

RSC's Cost Allocation Review Working Group (CAWG)

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

Missouri Staff working with the CAWG directed and just concluded an annual review of the SPP "Safe Harbor" transmission cost sharing protocol and found that the protocol continues to provide benefits at least equal to its cost. The "Safe Harbor" protocol also impacts how the costs of transmission projects are allocated across the SPP footprint.

The RSC is further charged with the responsibility to oversee SPP's resource adequacy. To fulfill that duty, Commission Staff working with CAWG also monitors

SPP's Supply Adequacy Working Group (SAWG) as it plans for and ensures SPP region-wide resource adequacy. The SAWG previously established the current 12% planning reserve margin (the amount of generation load serving entities must maintain in reserve to ensure SPP's members have the ability to generate required amounts of electricity at any time). The SAWG is also developing the metrics by which renewable energy resources will be accredited so adequate generation and reserves will be available for years into the future to satisfy electric demand (even under adverse circumstances) while minimizing wholesale energy costs.

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

Midcontinent Independent Transmission System Operator (MISO)

MISO serves Ameren Missouri, Columbia Water and Light, and smaller municipalities and cooperatives generally on the eastern side of Missouri. MISO coordinates operations of electric utilities across 15 states, the City of New Orleans and the Canadian province of Manitoba. MISO manages almost 72,000 miles of transmission lines and conducts on-going transmission grid expansion planning, operates wholesale day-ahead and real-time energy markets, coordinates inter-RTO grid management and manages federal utility compliance services with FERC for its members.

Calendar Year 2020 Resource Adequacy

On April 12, 2019, MISO conducted its annual Planning Resource Auction (PRA). PRA is the mechanism used by MISO to determine how much generating capacity it will need to meet its region-wide peak load for the coming planning year (June 1-May 31), how much capacity to hold in reserve for contingencies and what to pay generator owners per megawatt for capacity.

This year, MISO determined a planning reserve requirement of 135,000 megawatts will be required to meet load plus reserves. Missouri's forecasted requirements are slightly over 8,297 megawatts and will receive a capacity payment of $2.99/megawatt-day. Missouri's generators will be able to meet this requirement and have additional capacity to sell in the capacity market.

January 17, 2018 Cold Weather Event

On January 17, 2018 a cold weather snap had an extreme impact on the MISO southern states causing their demand to increase beyond their ability to locally generate energy. To satisfy the increased demand, the south imported energy from the rest of MISO and other non-MISO entities but in doing so, relied heavily upon SPP, Tennessee Valley Authority, Southern Company and other transmission systems. The primary link between the southern MISO states and the rest of MISO is a transmission line situated in the Boot Heel. Missouri's SPP-sub-345KV transmission systems were impacted and had to temporarily disconnect transmission elements from the Grid to protect their own systems. The impact affected the facilities of Empire, the Southwest Power Administration, City Utilities of Springfield, KCP&L, as well as facilities owned by companies in eastern Oklahoma and Kansas.

The Commission asked MISO and SPP to explain what happened, and why and what they were going to do to mitigate or eliminate such occurrences in the future. MISO and SPP explained they have enhanced their operations communications abilities and exchange information more readily than they have in the past. They expect these improvements to allow them to better predict when system-stressing events may occur and how to manage them in real time.

Organization of MISO States Leadership and Participation

Commissioner Daniel Hall currently serves on the Organization of MISO States (OMS) Board of Directors and was elected president in calendar year 2019. As president, Commissioner Hall coordinates OMS activities and guides policy direction and formation, and works with MISO management to ensure states' interests are adequately reflected and represented in MISO's markets and planning policies.

Coordination of States' Regulatory Commissions Seams Activities

Under the co-leadership of Commissioner Daniel Hall, SPP RSC and OMS, commissioners joined together to form the SPP RSC-OMS Seams Liaison Committee (Seams Liaison Committee). The Seams Liaison Committee is composed of four SPP RSC Commissioners, four OMS Commissioners, and the current president of NARUC as an ex-officio member. Commissioner Hall and Commissioner Shari Feist Albrecht of Kansas are the two co-chairs of the Seams Liaison Committee.

Under the leadership of Commissioners Hall and Albrecht, and with much of the materials developed by the Missouri Commission Staff, the Seams Committee performed the following actions in FY 2018:

- Set organizational goals and guiding principles around looking for the best outcome for customers on both sides of the MISO/SPP seam;
- Requested and received a whitepaper from MISO and SPP staffs on the history of the MISO/SPP seam;
- Requested and analyzed feedback from stakeholders on the whitepaper and on potential analysis to be performed on markets, operations, and transmission planning issues on the MISO/SPP seam;
- Contracted with the SPP Market Monitoring Unit and the MISO Independent Market Monitor to perform analysis on the markets and operations issues on the MISO/SPP seam, with analysis scheduled to be delivered in the fourth quarter of 2019.

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 the customer's concerns.

There are approximately 45 regulated water and/or sewer companies in the State of Missouri. Most of these companies are considered small or very small based upon those definitions as provided by the National Regulatory Research Institute (NRRI). Typically, these systems have less than 500 customers. One of the major challenges is providing the utility with reasonable revenue to make needed repairs and comply with Missouri Department of Natural Resources (DNR) mandated upgrades, while at the same time keeping rates reasonable for consumers.

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

SMALL RATE CASES

During fiscal year 2019, S.K. & M. was the only small water and/or sewer company to file a rate request. A small water or sewer utility is a utility that serves fewer than 8,000 customers. The rate case (Case No. SR-2019-0157) was unique in two ways. First, the utility requested and was granted emergency rates to cover significant cash flow problems caused by degrading infrastructure. Second, the utility was the first small water or sewer company to request and have approved a newly enacted rule entitled the "Environmental Improvement Contingency Fund" (EICF). This EICF rule was approved by the Commission to allow small water and sewer utilities the opportunity to request a fund to address significant environmental improvements needed to the utility system when the utility does not have access to the necessary capital to make the improvements.

Further, three small utilities that filed for rate cases in fiscal year 2018 had rates approved by the Commission in fiscal year 2019. One of these rate cases was filed by Liberty Utilities (Liberty) that has operations in southwest Missouri and near St. Louis in Jefferson and Franklin counties. In its request, Liberty requested a consolidation of its water rates. The Commission did not consolidate all rates, but did combine the rates for all systems in the Jefferson and Franklin county areas.

RECEIVERSHIP ACTIONS

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

In fiscal year 2019, the Commission approved a request filed by Confluence Rivers Utility (Case Nos. WM-2018-0116 and SM-2018-0117) to purchase Mill Creek, M.P.B., and Gladlo Water and Sewer which removed these three companies from receivership status.

Osage Utility Operating Company (Case No. WA-2019-0185) has filed an application to purchase Osage Water Company. If approved, this would remove Osage Water Company 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 PSC-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 PSC regulated systems that are not meeting state and federal guidelines for lead contamination.

Missouri-American Water Company (MAWC) has an active main replacement program where it replaces lead-based customer-owned service lines when these lines are found during main replacements.

On February 14, 2019, Staff requested that a working docket be opened by the Commission as a repository for information regarding this program. The Commission granted Staff's request. On February 15, 2019, MAWC filed a confidential update on its program.

Based on a presentation to the Commission in July 2019, MAWC has further stated that through May 2019, it has replaced approximately 2,000 lead service lines out of an approximate 30,000 lines.

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

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 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 76 companies have ETC status in Missouri.

During the past year the Missouri Commission granted ETC status to 10 companies. These companies sought ETC status as a result of submitting winning bids for the Connect America Fund Phase II auction process. This auction has tentatively awarded $254,773,118 over 10 years to 11 winning bidders to extend broadband service to a total of 95,130 designated unserved Missouri locations.

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, 41 landline companies and three wireless companies received approximately $174.8 million in federal high-cost support in 2018.

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.

This past year a total of 48 companies received such certification from the Missouri Commission. For calendar year 2018, these companies received a total of $174,783,919 in federal high cost USF support to help provide telecommunications and broadband services in designated high-cost Missouri areas.

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.

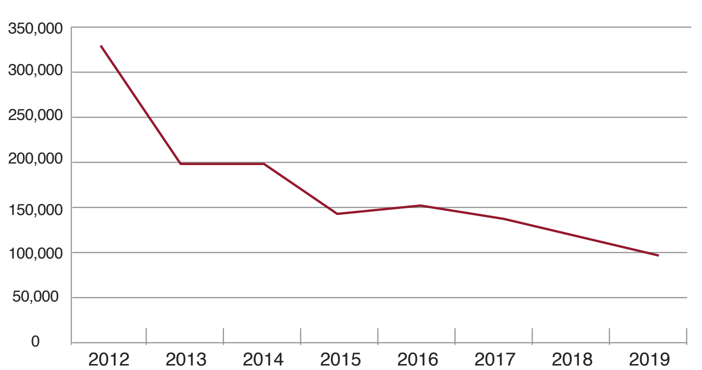
Landline and wireless companies participating in the Lifeline program currently receive federal USF funding of $9.25 per month for each Lifeline subscriber. Missouri provides an additional $6.50 per month but this amount only applies to landline voice Lifeline service.

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. In June 2018, the universal service administrator, USAC, began launching, on a state-by-state basis, the National Verifier, which requires USAC to review each enrollment and independently verify an applicant's eligibility. Prior to launch, USAC will "scrub" a list of all existing Lifeline subscribers in a state by verifying the eligibility of each subscriber and de-enrolling any existing subscriber which cannot be verified. Missouri's launch began March 5, 2019.

As of June 2019, there were approximately 8.6 million Lifeline subscribers nationwide. Missouri has 97,126 Lifeline subscribers which is a decrease from the prior year of 114,183 Lifeline subscribers.

During the past year the Missouri Commission opened a case to formally investigate whether a certain Lifeline provider is complying with Lifeline program requirements in Missouri. This same provider is also being investigated by the FCC. Both proceedings remain pending.

MISSOURI LIFELINE SUBSCRIBERS



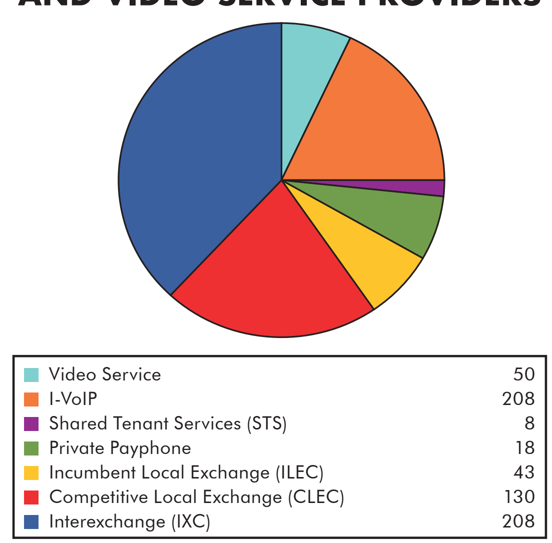
Disabled Program: The disabled program is similar to the Lifeline program in that it provides discounted phone service to consumers participating in the following programs: veterans' administration disability benefits, state blind pension, state aid to blind persons, state supplemental disability assistance 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 327 subscribers were participating in the program at the end of June 2019 versus 363 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.

TELECOMMUNICATIONS, IVOIP, AND VIDEO SERVICE PROVIDERS



The Missouri USF fund balance has increased from $2,440,922.81 to $2,758,460 during the July 2018 through June 2019 time period. The Missouri USF assessment is .0010 and the discount provided to customers of carriers offering Lifeline or disabled service is $6.50 per month per subscriber. The Commission is currently considering, in Case No. TO-2019-0346, proposals to adjust the support amount and the assessment.

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 Telephone Access Program. Missouri Assistive Technology administers the Telephone Access Program while the Missouri Commission oversees the provisioning of relay and CapTel services in Missouri. The Commission contracts with a party to provide relay and CapTel services. The existing contract was awarded to Sprint. This past year the FCC recertified Missouri's relay service as meeting federal relay requirements. This recertification process is conducted every five years.

The Relay Missouri Fund balance has declined from $3,593,201 to $2,700,118 during the July 1, 2018 to June 2019 time period. The decline may be attributed to decreasing expenditures such as less relay and CapTel usage supported by the fund. The Relay Missouri Fund is funded by a $.04 per line monthly surcharge applied to each landline providing basic local telecommunications service or interconnected VoIP service. The Missouri Commission evaluated the appropriateness of the surcharge level in Case No. TO-2019-0174 and decided to maintain it.

Pricing Reforms

Effective August 28, 2014, all retail telecommunications rates were de-regulated. Terms, conditions and rates associated with telecommunications services can either be maintained in a tariff filed with the Commission or by maintaining rates on a company's website. Currently 82 companies maintain their rates on their websites.

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 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 2019 fiscal year, the Commission was asked to examine and make determinations in four situations.

AREA CODE	PROJECTED DATE OF TELEPHONE NUMBER EXHAUSTION*	PERCENTAGE OF NUMBERS ASSIGNED TO CARRIERS
314	2nd quarter of 2024	58%
417	3rd quarter of 2031	38%
573	1st quarter of 2027	32%
636	*Exhaust date exceeds 30 years*	41%
660	*Exhaust date exceeds 30 years*	28%
816	2nd quarter of 2026	49%

*Forecast as approved by the FCC in April 2019. The exhaust dates are reviewed twice a year by numbering authorities.

Rulemakings

During the past year, the Commission considered several rulemakings applicable to telecommunications companies and IVoIP providers. The primary purpose of the rulemakings was to simplify rules and eliminate unnecessary rules. The Commission simplified its rules relating to certification, registration, assessments, reporting, telephone number administration and universal service funding. The rules became effective December 30, 2018. The Commission also considered proposals to eliminate rules applicable to wholesale telecommunications records, emergency telephone service standards and alternative dispute resolution procedures but ultimately retained the rules after public comment.

CUSTOMER EXPERIENCE DEPARTMENT

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

CXD Staff consists of Utility Management Analysts and Utility Policy Analysts. The CXD participated in a variety of cases and audit projects during FY 2019 including small utility rate cases, formal complaints, general rate cases, certificate applications, investigatory dockets, tariffs, rulemakings and working groups.

Staff performed service quality analysis during FY 2019 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.

The CXD 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. CXD 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 issues. Service quality is continuously reviewed with the companies to examine utility performance and customer service.

The CXD 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 SERVICES DEPARTMENT

The Consumer Services Department (Consumer Services):

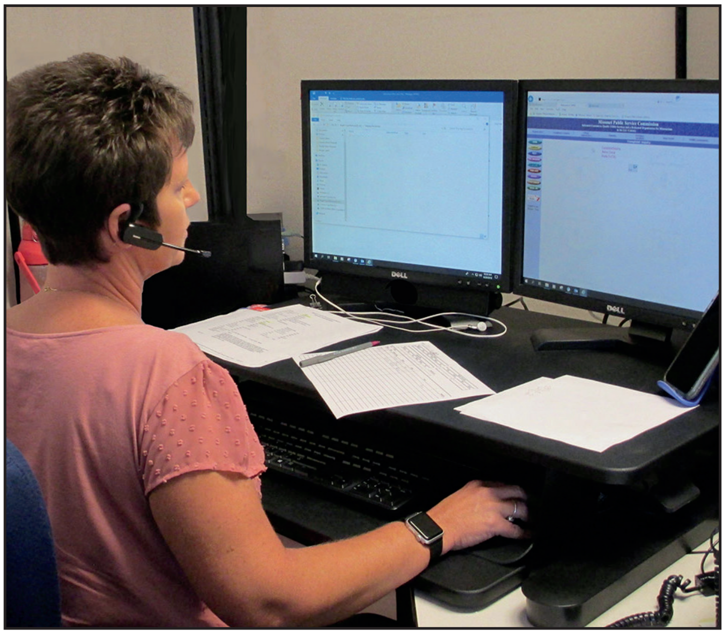
- Responds to information requests, consumer complaints and inquiries regarding utility service. Consumer Services also handles the submission of public comments regarding pending cases related to rate increases, certificate requests, formal complaints and working cases.
- Ensures utility compliance 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 7,300 customer-related contacts in 2019. 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 2019 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.**

During the 2019 fiscal year, the Program licensed 126 manufacturers, 197 retail dealers, and 63 installers. Field Staff conducted a total of six consumer complaint inspections.

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

Oversight and Regulation

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

Many multi-section units require several weeks to fully complete from site preparation to final close up and interior finish. Program Staff 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.

Manufactured Homes & Modular Unit Sales

Approximately 1,064 new manufactured homes and new modular units were sold in Missouri during the 2019 fiscal year. In addition, 984 used homes were sold in the state.

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

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

Recent Projects

The Program started implementation of new software and will be transitioning to that software in August 2019. The new software will provide a mobile inspection application that will speed up the reporting of all of the department's inspections, and allow manufacturers, dealers, and installers to submit reports through the civilian access portal. Consumers will also be able to submit inspection requests through the same access portal.

REGULATORY ACTIVITY

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

STATISTICS FOR FISCAL YEAR 2019

Registered Manufacturers	126
Registered Dealers	197
Registered Installers	63
Homes Sold (New & Used)	2,048
Consumer Complaint Inspections	6
On-Site Inspections	453
Dealer Lot Inspections	15
Dealer Lot Investigations	12
Modular Unit Seals Issued	618
Modular Unit Plans Approved	323
Installer Decals Issued	1,162

RATE CASES DECIDED DURING THE 2019 FISCAL YEAR

ELECTRIC

Date of Order	Case No.	Company	Rate Request	PSC Decision
07/05/18	ER-2018-0362	Ameren Missouri	N/A	($166.5 million)*
08/16/18	ER-2018-0366	Empire District Electric	N/A	($17.8 million)*
11/01/18	ER-2018-0145	Kansas City Power & Light	$16.4 million	($21 million)*
11/01/18	ER-2018-0146	KCP&L-GMO	$19.3 million	($24 million)*

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

NATURAL GAS

Date of Order	Case No.	Company	Rate Request	PSC Decision
10/17/18	GR-2018-0229	Empire District Gas Co.	N/A	($773,566)*
12/26/18	GR-2019-0077	Ameren Missouri	($1.05 million)**	($1.94 million)**(1)

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

**Interim rate decrease, subject to the determination of permanent rates to be set in Case No. GR-2019-0077, which reflects the change in the corporate tax rate from 35% to 21% under the federal Tax Cuts and Jobs Act of 2017.

(1) Permanent rates were set in this case in a Commission order issued on August 21, 2019.

WATER AND SEWER

Date of Order	Case No.	Company	Rate Request	PSC Decision
10/24/18	WR-2018-0170	Liberty Utilities	$ 995,844	$ 818,800
10/24/18	SR-2018-0171	Liberty Utilities	$ 196,617	$ 196,782
10/31/18	WR-2018-0328	Middlefork Water Co.	$ 55,400	$ 60,154
11/15/18	WR-2018-0356	Branson Cedars Resort Utility	$ 49,120	$ 17,032
06/19/19	SR-2019-0157	S.K.& M. Water & Sewer Co.	$ 100,000	$ 81,058
06/19/19	SR-2019-0158	S.K.& M. Water & Sewer Co.	$ 200,000	$ 119,102

ELECTRIC STATISTICS

Calendar Year 2018 (Missouri Jurisdictional)

Company Name	Operating Revenues	MWhs Sold	Residential Customers	Total Customers
Empire District Electric Co.	$ 522,849,828	4,321,595	129,864	154,042
Kansas City Power & Light Co.	$ 981,872,159	8,675,389	257,216	292,895
KCP&L-GMO	$ 819,407,314	8,385,397	283,571	334,176
Ameren Missouri (1)	$3,001,630,980	33,699,583	1,060,493	1,223,736
Totals:	**$5,325,760,281**	**55,081,964**	**1,731,144**	**2,004,849**

Source: MoPSC FERC Form 1, 2018 Annual Reports (Missouri Jurisdictional)
(1) Union Electric Company d/b/a

STEAM STATISTICS

Calendar Year 2018 (Missouri Jurisdictional)

Company Name	Operating Revenues	MMBtus Sold	Residential Customers	Total Customers
KCP&L-GMO	$ 16,314,658	2,766,196	0	5
Veolia Energy Kansas City, Inc (1)	$ 21,113,242	1,897,774	0	49
Totals:	**$ 37,427,900**	**4,663,970**	**0**	**54**

Source: 2018 Annual Report

(1) Reported in MLB's

NATURAL GAS STATISTICS

Calendar Year 2018 (Missouri Jurisdictional)

Company Name	Operating Revenues	Mcfs Sold	Residential Customers	Total Customers
Liberty Utilities	$ 59,452,400	8,523,605	46,204	53,138
Empire District Gas Co.	$ 43,672,558	8,311,975	37,528	43,011
Spire Missouri East (1)	$ 737,709,164	95,554,004	613,078	654,390
Spire Missouri West (2)	$ 515,742,136	83,115,840	477,212	517,537
Summit Natural Gas Co. (3)	$ 34,797,872	3,582,305	16,967	20,605
Ameren Missouri (4)	$ 131,020,262	20,314,446	117,879	131,483
Totals:	**1,522,394,395**	**219,402,175**	**1,308,868**	**1,420,164**

Source: MoPSC FERC Form 2 2018 Annual Reports (Missouri Jurisdictional)

(1) Formerly Laclede Gas Company
(2) Formerly Missouri Gas Energy, a division of Laclede Gas Company
(3) Formerly Missouri Gas Utility and Southern Missouri Gas Company, L.P. d/b/a
(4) Union Electric Company d/b/a

STAND ALONE WATER AND SEWER COMPANIES FISCAL YEAR 2019*

NAME OF WATER COMPANY	CUSTOMERS
Arglye Estates	52
Empire District Electric Company (1)	4,512
Environmental Utilities	21
Franklin County (1)	190
Gascony Water	195
Indian Hills Utility Operating Company, Inc.	725
Lakeland Heights	80
Middlefork**	2
Oakbrier Water Company	58
Raytown Water Company	6,628
Rex Deffenderfer Enterprises	1,138
Ridge Creek Water Company, LLC (1)(2)	130
Stockton Hills Water Company	165
Village Greens Water Company	90
Whispering Hills Water Company	51
Whiteside Hidden Acres, LLC	34
Total Number of Customers	**14,071**

NAME OF SEWER COMPANY	CUSTOMERS
Cannon Home Association	114
Central Rivers Wastewater Utility, Inc.	295
Mid-MO Sanitation	29
North Oak Sewer District	81
RD Sewer	113
Raccoon Creek Utility Operating Company	522
TBJ Sewer Systems, Inc.	73
Taneycomo Highlands	32
Timber Creek Sewer Company	2,215
TUK LLC	27
Warren County Sewer Company	34
Total Number of Customers	**3,535**

*Active Companies as of 6/30/19. 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.
(1) Sale / Transfer Pending
(2) Operating Under Receivership

COMBINATION WATER AND SEWER COMPANIES FISCAL YEAR 2019*

COMPANY NAME	WATER CUSTOMERS	SEWER CUSTOMERS
188 N. Summit	60	60
Branson Cedars Resort	64	50
Cedar Green Land Acquisition	54	54
Confluence Rivers Utility Operating Company, Inc.	710	639
Elm Hills Utility Operating Company, Inc.	119	361
Foxfire	257	254
Hillcrest Utility Operating	244	245
Holtgrewe Farms	32	24
Lake Northwoods Utility	17	17
Liberty Utilities	3,251	411
Lincoln County Water & Sewer	202	202
Missouri-American Water Company	467,802	13,753
Osage Water and Sewer (1) (2)	402	420
Port Perry Service Company (1)	370	248
SK&M Water & Sewer	302	156
Terre du Lac Utilities	1,299	1,282
Total Number of Customers	**475,185**	**18,176**

*Active Companies as of 6/30/19. Customer numbers based on most recent data available.
(1) Sale / Transfer Pending
(2) Operating Under Receivership

JULY 5 Public Service Commission approves agreement which reduces the annual electric revenues of Union Electric Company d/b/a Ameren Missouri by approximately $166.5 million. The rate decrease reflects a reduction in the federal corporate income tax rate from 35 percent to 21 percent as a result of passage of the federal Tax Cuts and Jobs Act of 2017.

JULY 11 Public Service Commission issues decision regarding The Empire District Electric Company's (Empire) proposed Customer Savings Plan (CSP), granting Empire certain accounting and depreciation treatment related to the CSP as well as a variance from the Commission's affiliate transactions rule.

JULY 19 Public Service Commission approves an application filed by Missouri-American Water Company to purchase the water and sewer system assets of the City of Lawson.

AUGUST 15 Electric customers of The Empire District Electric Company to see a rate reduction of approximately $17.8 million under an order issued by the Public Service Commission. The rate decrease reflects a reduction in the federal corporate income tax rate from 35 percent to 21 percent as a result of passage of the federal Tax Cuts and Jobs Act of 2017.

AUGUST 28 Public Service Commission grants a certificate of convenience and necessity (CCN) to Ameren Missouri to build a solar facility under a pilot subscriber solar program. The solar project will be developed on land at the St. Louis Lambert International Airport.

SEPTEMBER 6 Public Service Commission joins a national effort in observing National Telephone Discount Lifeline Awareness Week (September 10-14).

SEPTEMBER 12 Public Service Commission grants a CCN to Elm Hills Utility Operating Company, Inc. to install, own and operate sewer systems in Johnson County near Knob Noster. The CCN authorizes Elm Hills to provide sewer service to the Rainbow Acres and Twin Oaks service areas.

SEPTEMBER 20 Public Service Commission approves joint application authorizing Missouri-American Water Company to purchase the water and sewer assets of Rogue Creek Utilities, Inc.

SEPTEMBER 27 Public Service Commission grants a CCN to Timber Creek Sewer Company to provide sewer service to the Oakridge Subdivision in Clay County near Kearney.

OCTOBER 17 Natural gas customers of The Empire District Gas Company to see a natural gas rate reduction of approximately $773,566. The rate decrease reflects a reduction in the federal corporate income tax rate from 35 percent to 21 percent as a result of passage of the federal Tax Cuts and Jobs Act of 2017.

OCTOBER 24 Public Service Commission grants a CCN to Union Electric Company d/b/a Ameren Missouri to construct and operate an approximate 400 megawatt wind generation facility (known as High Prairie Wind Farm) in Schuyler and Adair counties.

OCTOBER 31 Public Service Commission approves agreements which reduce the annual electric operating revenues of Kansas City Power & Light Company (KCP&L) by approximately $21 million and KCP&L-Greater Missouri Operations Company (GMO) by approximately $24 million. The electric rate reductions reflect the impact of the federal Tax Cuts and Jobs Act of 2017 which lowered the federal corporate income tax rate from 35 percent to 21 percent. When KCP&L and GMO filed rate requests with the Public Service Commission on January 30, 2018, KCP&L sought an increase in annual electric operating revenues of approximately $16.4 million. GMO sought to increase annual electric operating revenues by approximately $19.3 million.

NOVEMBER 1 Public Service Commission's Cold Weather Rule takes effect.

NOVEMBER 7 Public Service Commission approves an agreement which authorizes Veolia Energy Kansas City, Inc. to increase annual steam operating revenues by approximately $463,000. The agreement reflects the effect of the 2017 federal Tax Cuts and Jobs Act which reduced the federal corporate income tax rate from 35 percent to 21 percent.

NOVEMBER 15 Public Service Commission approves application filed by the court-appointed receiver for Ridge Creek Water Company, LLC and Ridge Creek Development Company, LLC to sell the water system to the City of St. Robert.

NOVEMBER 28 Public Service Commission approves an agreement granting a CCN to Ameren Transmission Company of Illinois (ATXI) to acquire certain electrical facilities near Rolla and to own, operate, maintain and control those facilities as well as adjacent facilities ATXI plans to construct.

DECEMBER 3 Union Electric Company d/b/a Ameren Missouri files a natural gas rate case with the Public Service Commission seeking to increase annual natural gas revenues by approximately $4.26 million. As part of its filing, Ameren Missouri also sought an interim rate reduction of approximately 1.43 percent to reflect the impact of the change in the federal corporate income tax rate from 35 percent to 21 percent under the federal Tax Cuts and Jobs Act of 2017.

DECEMBER 5 Public Service Commission approves an agreement which authorizes Union Electric Company d/b/a Ameren Missouri to continue promoting demand-side programs, including energy efficiency and demand response programs under Cycle 3 of the Missouri Energy Efficiency Investment Act (MEEIA).

DECEMBER 19 Public Service Commission grants a CCN to GridLiance High Plains LLC f/k/a South Central MCN LLC to construct, own, install and maintain certain Southwest Power Pool mandated network upgrades to an approximate 1.25 mile-long 69 kilovolt electric transmission line in Christian County.

DECEMBER 22 Public Service Commission approves an agreement which provides an interim rate reduction of approximately $1.94 million for natural gas customers of Union Electric Company d/b/a Ameren Missouri. The interim rate reduction will remain in effect until the Public Service Commission decides a natural gas rate case Ameren Missouri filed on December 3, 2018. The interim rate reduction reflects the impact of the change in the federal corporate income tax rate from 35 percent to 21 percent under the federal Tax Cuts and Jobs Act of 2017.

FEBRUARY 6 Public Service Commission approves a pilot program for Ameren Missouri designed to further advance electric vehicle adoption in Missouri.

FEBRUARY 14 Public Service Commission approves agreement authorizing Confluence Rivers Utility Operating Company, Inc. to purchase the regulated water and/or sewer system of Smithview H2O Company, M.P.B., Inc., Mill Creek Sewers, Inc., Roy L Utilities, Inc., Evergreen Lake Water Company, Gladlo Water & Sewer Company, The Willows Utility Company and Calvey Brook Water and Sewer. Confluence Rivers was also granted authority to provide water service to customers in the Eugene, Missouri area and to water and sewer customers of the Majestic Lakes and Auburn Lake Estates areas in Lincoln County.

FEBRUARY 14 Public Service Commission opens working case to evaluate potential mechanisms for further development of Missouri's Electric Vehicle (EV) charging network.

FEBRUARY 20 Public Service Commission opens working case designed to facilitate discussions among stakeholders about topics surrounding Missouri-American Water Company's Lead Service Line Replacement Program.

MARCH 6 Public Service Commission grants a CCN to Union Electric Company d/b/a Ameren Missouri to construct and operate an approximate 157 megawatt wind generation facility (known as the Brickyard Hills Wind Facility) in Atchison County.

MARCH 18 Public Service Commission supports national "Fix-A-Leak Week".

MARCH 20 Public Service Commission grants a CCN to Grain Belt Express Clean Line LLC to construct, own, operate, manage and maintain a high voltage, direct current transmission line and associated facilities within the Missouri counties of Buchanan, Clinton, Caldwell, Carroll, Chariton, Randolph, Monroe and Ralls.

APRIL 2 Public Service Commission observes National Safe Digging Month.

APRIL 17 Public Service Commission grants a CCN to Missouri-American Water Company to construct, own, operate and maintain a sewer system in the Timber Springs Estates Subdivision in Clinton County near Trimble.

APRIL 17 Public Service Commission grants a CCN to United Services, Inc. to construct, own, operate and maintain sewer systems for the public in unincorporated areas of Andrew and Nodaway counties.

APRIL 24 Public Service Commission grants a CCN to Spire Missouri, Inc. to construct, own, operate and maintain a natural gas distribution system in Barry County. It is a further expansion of Spire's existing certificated area.

APRIL 24 Public Service Commission grants a CCN to Spire Missouri, Inc. to construct, own, operate and maintain a natural gas distribution system in Barton County. It is a further expansion of Spire's existing certificated area.

MAY 15 Public Service Commission opens case to consider proposed modifications to the Missouri Universal Service Fund.

JUNE 5 Public Service Commission grants Invenergy Transmission LLC request to acquire Grain Belt Express Clean Line LLC.

JUNE 5 Public Service Commission opens working docket directing Staff to investigate the self-commit and self-scheduling practices of Missouri's investor-owned electric utilities in their respective Regional Transmission Organization energy markets to determine if such practices inure to the benefit of their ratepayers.

JUNE 19 Public Service Commission grants CCNs to The Empire District Electric Company to build two wind generation facilities (each up to 150 MWs) to be located in the Missouri counties of Barton, Dade, Jasper and Lawrence. The Commission also granted Empire a CCN to build a wind generation facility of up to 301 MWs located in Neosho County, Kansas.

COMMISSIONERS PAST & PRESENT

COMMISSIONER	LENGTH OF SERVICE
John M. Atkinson	1913-1916
William F. Woerner	1913-1914
John Kennish	1913-1917; 1920
Frank A. Wightman	1913-1915
Howard B. Shaw	1913-1917
Edwin J. Bean	1914-1925
Eugene McQuillin	1915-1917
William G. Busby	1916-1921
David E. Blair	1917-1920
Noah W. Simpson	1917-1923
Edward Flad	1917-1921
John A. Kurtz	1920-1923
Hugh McIndoe	1921-1923
A.J. O'Reilly	1921-1925
Richard H. Musser	1923-1925
Merrill E. Otis	1923-1924
Thomas J. Brown	1923-1928
D.E. Calfee	1925-1929
Almon Ing	1925-1933
S.M. Hutchinson	1925-1931
J.H. Porter	1925-1933
James P. Painter	1928-1929
Milton R. Stahl	1929-1933
J. Fred Hull	1929-1934
George H. English	1931-1936
J.C. Collet	1933-1935
William Stoecker	1933-1936
W.M. Anderson	1933-1938
Harry E. McPherson	1934-1935
Sam O. Hargus	1935-1937
John S. Boyer	1935-1941
Albert D. Nortoni	1936-1938
John A. Ferguson	1936-1944
J.D. James	1937-1942
Marion S. Francis	1938-1941
Scott Wilson	1938-1941
Paul Van Osdol	1941-1943
Frederick Stueck	1941-1943
Kyle Williams	1941-1952
Charles L. Henson	1942-1959
Albert Miller	1943-1944
Agnes Mae Wilson	1943-1949
Richard Arens	1944-1945
E.L. McClintock	1945-1967
Morris E. Osburn	1945-1952
John P. Randolph	1949-1951
Henry McKay Cary	1950-1955
Maurice Covert	1952-1953
Tyre W. Burton	1952-1965
Frank Collier	1953-1954
M.J. McQueen	1954-1956
D.D. McDonald	1955-1961
William Barton	1956-1965
Frank J. 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
Daniel Y. Hall	2013-2019
William P. Kenney	2013-present
Scott T. Rupp	2014-present
Maida Coleman	2015-present
Ryan Silvey	2018-present

Missouri Public Service Commission

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