# MISSOURI
# PUBLIC SERVICE COMMISSION

## 2024
## ANNUAL REPORT

# PSC COMMISSIONERS


**MEMBERS OF THE MISSOURI PUBLIC SERVICE COMMISSION**

*From left;* Commissioner **Glen Kolkmeyer**; Commissioner **Maida J. Coleman**; Chair **Kayla Hahn**; Commissioner **Jason R. Holsman**; Commissioner **John P. Mitchell**.

*Front cover, clockwise top left: Callaway Energy Center (photo courtesy of Ameren Missouri); Local Public Hearing; Dogwood Energy Facility; Natural Gas Pipeline Construction*

# *Missouri Public Service Commission*

**MAIDA J. COLEMAN**
Commissioner

**GLEN KOLKMEYER**
Commissioner

**KAYLA HAHN**
**Chair**

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

**JASON R. HOLSMAN**
Commissioner

**JOHN P. MITCHELL**
Commissioner

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

Dear Governor Parson:

On behalf of the Missouri Public Service Commission, it is my honor to present the Commission's Annual Report for Fiscal Year 2024. This report provides a general overview of the Commission's activities over the past year, which includes major technology improvements, a refocus on leadership and management, and ensuring that Missouri has adequate and reliable service to meet both current needs and new economic development opportunities.

This year, our team greatly enhanced the public's ability to access Commission business, including case activity with the launch of the new and improved Electronic Filing and Information System (EFIS). This technology transformation has increased the public's access to information, improved user searchability and functionality, and increased system security. Consumers can continue to access the Commission's website and view, in real-time, hearings and public meetings of the Commission.

Also during Fiscal Year 2024, the Commission, along with management and Commission staff leadership, initiated a renewed focus on leadership and management aimed to enhance employee engagement and productivity. Renewed leadership and management efforts are producing encouraging results, measured through QPS participation, which include enhanced training opportunities, improved office environments, and focused team member appreciation efforts. The quality and professionalism of our team members at the Commission is critical to the State of Missouri and the ratepayers served by the Commission's work.

Importantly, the Commission has also focused on state energy policy and regulatory improvements. As such, the Commission has deliberately pursued the updating of regulatory procedures by rule, rescinding outdated and ineffective rules, and promulgated rules to bring our programs up-to-date with what the General Assembly has enacted. But perhaps the most important action the Commission has undertaken has been initiating a critical public conversation and call to action to ensure resource adequacy and reliability of the electric grid. Missouri is facing a resource adequacy challenge through current system demands and anticipated economic opportunity. Those factors, combined with the existing customer demands of an "always on," reliable, and resilient supply of electric power has spurred critical conversations and a need to look at new ways of approaching challenges in order to embrace opportunity.

As you know, much of this work would not have happened without the dedicated work of staff. The staff at the Commission are true public servants who are responsible for executing many of the initiatives previously listed. We would not have made such great progress in Fiscal Year 2024 without them.

I am thankful for the opportunity to lead the Missouri Public Service Commission and to serve Missouri citizens and ratepayers, and I look forward to many continued improvements in the future.

Sincerely,

Kayla Hahn

Kayla Hahn
Chair

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# CONTACTING THE PSC

**Main Phone Number:** 800-392-4211

**Consumer Hotline for Complaints/Inquiries:** 800-392-4211

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

**Manufactured Housing/Modular Unit Complaints**: 800-819-3180

**EFIS Toll-Free Help Desk:** 866-365-0924

**Website:** psc.mo.gov

**Email:** pscinfo@psc.mo.gov

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

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

**St. Louis: Missouri Public Service Commission**
Wainwright State Office Building
111 North 7th Street, Suite 105
St. Louis, Mo. 63101
**Telephone**: 314-244-2141
**Fax:** 314-244-2100

**Kansas City: Missouri Public Service Commission**
Fletcher Daniels State Office Building
615 E. 13th Street, Room 201
Kansas City, Mo. 64106
**Telephone:** 816-889-3949

# BUDGET

| | Fiscal Year 2025 |
|---|---|
| **Public Service Commission** | |
| Public Service Commission-Personal Service | $14,155,057 |
| Public Service Commission-Expense & Equipment | $2,311,041 |
| Public Service Commission-Refunds | $10,000 |
| Total | $16,476,098 |
| Full-Time Employees (F.T.E.) | 192.00 |
| **Deaf Relay Service and Equipment Distribution Program** | |
| Expense & Equipment Appropriation | $2,495,886 |
| Total | $2,495,886 |
| Full-Time Employees (F.T.E.) | 0.00 |
| **Manufactured Housing Department** | |
| Personal Service | $490,274 |
| Expense & Equipment | $354,484 |
| Program Specific Distribution (MH) | $50,000 |
| MH-Refunds | $10,000 |
| Subtotal | $904,758 |
| **Program Specific Distribution MH Consumer Recovery*** | $192,000 |
| Total | $1,096,758 |
| Full-Time Employees (F.T.E.) | 8.00 |
| **TOTAL BUDGET** | **$20,068,742** |
| **TOTAL FTE** | **200.00** |

*Consumer Recovery Fund Appropriation

# PSC COMMISSIONERS

## Kayla Hahn
## Chair

Chair Kayla Hahn was appointed to the Missouri Public Service Commission by Governor Michael Parson on June 1, 2023. Chair Hahn was appointed to a new six-year term on Jan. 2, 2024. On Feb. 6, 2024, she was named Chair of the Public Service Commission.

Prior to her appointment, Chair Hahn was on the Governor's senior staff team as Policy Director and had served as Senior Advisor and Policy Director for Governor Parson since August 2018.

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

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

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

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

## Maida J. Coleman
## Commissioner

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

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

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

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

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

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

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

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

## Jason R. Holsman
## Commissioner

Commissioner Jason Holsman was appointed to the Missouri Public Service Commission on Jan. 13, 2020, by Governor Michael Parson and was unanimously confirmed by the Missouri State Senate on Jan. 16, 2020. Commissioner Holsman also serves as the Seams Representative on the Organization of MISO States (OMS) for the Midcontinent Independent System Operator (MISO).

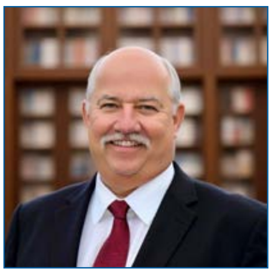
In addition to Commissioner Holsman's responsibilities at the Commission, his involvement in the National Association of Regulatory Utility Commissioners (NARUC) includes his appointment as Chair of the NARUC International Relations Committee. He is also a member on the Energy Resources and the Environment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

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

Chairman for the Prescription Drug Transparency Interim Committee.

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

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



## Glen Kolkmeyer
## Commissioner

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

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

In addition to his new role at the PSC, Commissioner Kolkmeyer is owner and CEO of Energy Transport Solutions, Inc. in Bates City, Missouri, a family owned and operated company that hauls gasoline, diesel, propane and anhydrous ammonia.

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

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

## John P. Mitchell
## Commissioner

Commissioner John P. Mitchell was appointed to the PSC by Governor Michael Parson on April 12, 2024. He was unanimously confirmed by the Missouri Senate on April 25, 2024.

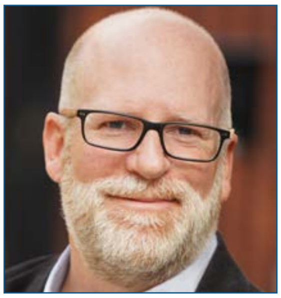
Prior to his appointment to the PSC, Commissioner Mitchell worked for 34 years at Burns & McDonnell Engineering in Kansas City, Mo. Commissioner Mitchell joined the engineering firm in 1988 and during his time there, he served in a number of different capacities including project engineer, project manager and wastewater department manager. He served as Principal in Charge on many of the firm's major water and wastewater projects. Commissioner Mitchell retired in 2022 as a Principal at Burns & McDonnell Engineering. When he retired, he served as Director of Alternative Delivery for Burns & McDonnell's Global Water Practice.

Over his career, Commissioner Mitchell assisted more than 30 communities in executing water and wastewater infrastructure projects utilizing alternative forms of project delivery including Design/Build, EPC and Design CM.

Commissioner Mitchell also assisted the states of Missouri, Kansas and Oklahoma in developing legislation and policies for the delivery of water and wastewater utility projects using various forms of alternative project delivery such as design build and construction management. He also assisted these states in developing policies and procedures for financing projects through their State Revolving Loan Fund programs, utilizing alternative forms of project delivery.

From 2018-2022, Commissioner Mitchell was on the Board of Directors of the Design Build Institute of America (DBIA) Mid-America Region and served as co-chair of the DBIA National Water and Wastewater Committee. He also authored Chapter 20 of the American Water Works Association's *Design-Build for Water and Wastewater Projects.*

Commissioner Mitchell received his Bachelor of Science in civil engineering from the Missouri University of Science and Technology in Rolla, Mo. He is currently a licensed professional engineer in Missouri and Kansas.



## Scott T. Rupp
## Commissioner

Scott T. Rupp was sworn in at the Missouri Public Service Commission in April of 2014. In January 2023, Rupp was appointed Chairman by Governor Michael Parson. Previously he served two terms in the Missouri State Senate from 2006-2014, and two terms as a State Representative from 2003-2006.

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

Chairman Rupp earned his Master of Science degree in energy and sustainability through the University of Denver, his MBA from Lindenwood University, and his bachelor's degree from the University of Missouri. Scott is a member of the 2017 graduating class of the National Renewable Energy Labs' Executive Leadership Program, as well as a graduate of the 2016 Institute for Regulatory Law & Economics Executive Leadership Program.

Commissioner Rupp resigned from the Commission April 25, 2024.

# PSC KEY PERSONNEL

## Commissioners

| | |
|---|---|
| Kayla Hahn, Chair | 573-751-0946 |
| Maida J. Coleman, Commissioner | 573-751-4132 |
| Jason R. Holsman, Commissioner | 573-751-4221 |
| Glen Kolkmeyer, Commissioner | 573-526-7796 |
| John P. Mitchell, Commissioner | 573-522-8005 |

## Administration Division

| | |
|---|---|
| Loyd Wilson, Director | 573-751-7435 |
| Ethan Todd, Legislative Liaison | 573-751-4636 |
| Jay Eastlick, Manager-Consumer Services | 573-751-3160 |
| John Hanauer, Manager-Information Services | 573-522-2453 |
| Forrest Gossett, Communications Director/Chief Public Information Officer | 573-751-9300 |
| Garrett Pitts, Manager-Budget and Fiscal Services | 573-526-9120 |
| Debbie Quick, Public Relations Coordinator | 573-522-2760 |
| Consumer Services Toll-Free Hotline | 800-392-4211 |
| EFIS Toll-Free Help Desk | 866-365-0924 |

## General Counsel Division

| | |
|---|---|
| Rodney Massman, General Counsel | 573-751-7510 |
| Jennifer Heintz, Chief Litigation Counsel, External Litigation | 573-751-8701 |
| Nancy Dippell, Secretary/Chief Regulatory Law Judge | 573-751-8518 |
| Kim Happy, Document Control and Records Manager | 573-522-6225 |
| Cherlyn Voss, Manager-Regulatory Analysis Department | 573-751-3966 |

## Industry Analysis Division

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

## Financial and Business Analysis Division

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

## Staff Counsel Division

| | |
|---|---|
| Mark Johnson, Chief Staff Counsel | 573-751-7431 |
| Travis Pringle, Chief Deputy Counsel | 573-751-5700 |
| Casi Aslin, Deputy Counsel-Water and Sewer | 573-751-8517 |
| Jeff Keevil, Deputy Counsel-Electric | 573-526-4887 |
| Scott Stacey, Deputy Counsel-Natural Gas | 573-522-6279 |

# 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

## ADMINISTRATION DIVISION

**Loyd Wilson**
*Director of Administration*

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 Liaison 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.

## FINANCIAL AND BUSINESS ANALYSIS DIVISION

**Kim Bolin**
*Director of Financial and Business Analysis*

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.

## INDUSTRY ANALYSIS DIVISION

**Jim Busch**
*Director of Industry Analysis*

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

## STAFF COUNSEL DIVISION

**Mark Johnson**
*Staff Counsel*

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

## GENERAL COUNSEL DIVISION

**Rodney Massman**
*General Counsel*

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

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

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

## SECRETARY OF THE COMMISSION / CHIEF REGULATORY LAW JUDGE

**Nancy Dippell**
*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.

# REGULATORY ACTIVITY

## COMMISSION ORDERS

### ELECTRIC

**Ameren Missouri**
**Case No. ER-2024-0112**

On Sept. 28, 2023, Union Electric Company d/b/a Ameren Missouri filed a proposed tariff sheet and supporting testimony to modify rates under its Renewable Energy Standard Rate Adjustment Mechanism (RESRAM) from $0.00035 per kWh to $0.00204 per kWh.

The PSC Staff (Staff) filed its recommendation with the Commission on Dec.18, 2023.

On Jan.10, 2024, the Commission approved the tariffs implementing new rates to become effective on and after Feb. 1, 2024.

**Ameren Missouri**
**Case No. ER-2024-0319**

On June 28, 2024, Ameren Missouri submitted a tariff revision that reflected an increase of approximately $446.2 million. According to Ameren Missouri, the rate increase request was due to several drivers including significant capital investments as part of their SEP, changes in depreciation rates, and an increase in the cost of capital to reflect current and expected economic conditions.

The Staff filed a joint proposed procedural schedule on Aug. 9, 2024 which the Commission adopted.

This electric rate case is pending and the evidentiary hearing will be held between March 17, 2024, and March 28, 2024.

**Evergy Missouri West**
**Case No. ER-2024-0189**

On Feb. 2, 2024, Evergy Missouri West filed an electric rate case with the Commission seeking to increase annual electric revenues by approximately $104.5 million. According to the direct testimony of Darrin R. Ives on behalf of Evergy Missouri West, the rate increase request is due to a need to support recovery of investments in dispatchable generation capacity, improving reliability and grid modernization and enhancing customer service and customer experience.

The Staff, the Office of Public Counsel (OPC) and other intervening parties filed their recommendations with the Commission regarding Evergy Missouri West's rate increase request on June 27, 2024.

This electric rate case is pending and the evidentiary hearing will be held between Sept. 30, 2024, and Oct. 11, 2024.

### OTHER ELECTRIC ISSUES

**Amendment of the Commission's Rule Regarding Safety Standards for Electrical Corporations, Telecommunications Companies and Rural Electric Cooperatives**
**Case No. EX-2023-0254**

On March 29, 2023, the Commission undertook a rulemaking to modify the Commission's rules regarding electric safety standards, specifically 20 CSR 4240-18.010 Safety Standards for Electrical Corporations, Telecommunications Companies and Rural Electric Cooperatives.

The Commission issued its Final Order of Rulemaking on Aug. 10, 2023. This rule became effective on Nov. 30, 2023.

**Osage Valley & Harrisonville Territorial Agreement**
**Case No. EO-2023-0439**

On June 27, 2023, Osage Valley Electric Cooperative Association (Osage Valley) and the City of Harrisonville (Harrisonville) filed a Joint Application for approval of a Territorial Agreement for Osage Valley to serve new facilities to be installed within the city limits of Harrisonville stating that doing so would prevent duplication of services.

Staff filed its recommendation on Aug. 3, 2023.

On Sept. 14, 2023, the Commission approved the agreement to be made effective on Oct. 14, 2023.

**Grain Belt Express, LLC Amendment to its CCN**
**Case No. EA-2023-0017**

On Aug. 24, 2022, Grain Belt Express, LLC filed an application to amend a Certificate of Convenience and Necessity (CCN) previously granted by the Commission in Case No. EA-2016-0358.

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

The Commission conducted three public hearings to receive comments from the general public and held an evidentiary hearing on June 5, 2023, to June 8, 2023.

On Oct. 12, 2023, the Commission issued an order to grant the requested CCN subject to conditions.

### Ameren Missouri & Tri-County Electric Cooperative Territorial Agreement
### Case No. EO-2024-0208

On Jan. 3, 2024, Ameren Missouri and Tri-County filed a Joint Application for approval of a territorial agreement that would change Ameren Missouri's certificated electric service area in Adair County to prevent future duplication of electric service facilities. On Feb. 5, 2024, the Joint Applicants filed an amended application

On Feb. 29, 2024, the Commission approved the territorial agreement between Ameren Missouri and Tri-County Electric Cooperative.

### Evergy Missouri West CCN – Dogwood Energy Facility
### Case No. EA-2023-0291

On Nov. 8, 2023, Evergy Missouri West filed an application for approval to acquire a 22.2 percent interest in an existing natural gas-fired, combined-cycle electric generation facility located in Pleasant Hill, Cass County, known as the Dogwood Energy Facility, as well as a CCN to own, operate, maintain, and otherwise control and manage the Dogwood Energy Facility.

On Feb. 26, 2024, Evergy Missouri West, Staff, the OPC, and Renew Missouri filed a Unanimous Stipulation and Agreement.

On March 21, 2024, the Commission issued an order approving the Unanimous Stipulation and Agreement and granting the requested CCN.

### Ameren Transmission Company of Illinois (ATXI) – Fabius Switchyard
### Case No. EA-2024-0147

On Feb. 2, 2024, Ameren Transmission Company of Illinois (ATXI) filed a CCN application seeking Commission authority to construct, install, own, operate, maintain, and otherwise control a new 345 kV switchyard and associated facilities (known as the "Fabius Switchyard") in Knox County. The purpose of the switchyard is to interconnect a 290 MW wind project in northeast Missouri being developed by ATXI's interconnecting customer, Northeast Missouri Wind, LLC (NEMO Wind)

Staff filed its recommendation on March 19, 2024.

On April 10, 2024, the Commission issued an order approving an agreement to grant the requested CCN subject to conditions.

### Liberty CCN – Riverton Unit 10 & 11
### Case No. EA-2023-0131

On Feb. 14, 2023, The Empire District Electric Company d/b/a Liberty Utilities (Liberty), filed an application with the Commission seeking an order granting a CCN authorizing Liberty to construct, install, own, operate, maintain, and otherwise control and manage two combustion turbine generators, each with a nominal net output of 13.3 MW, to replace existing combustion turbine generators, Riverton Unit 10 and Riverton Unit 11, located in Riverton, Cherokee County, Kan.

Liberty filed their first amended application for a certificate of convenience and necessity on Oct. 13, 2023, and a second amended application on Jan. 22, 2024.

On June 5, 2024, the Commission issued an order approving the Stipulation and Agreement and granting the requested CCN, subject to conditions.

### Ameren Missouri CCN – Four Solar Generation Facilities
### Case No. EA-2023-0286

On June 12, 2024, Ameren Missouri filed an application seeking a CCN to construct, install, own, operate, maintain, and otherwise control and manage four solar generation facilities: (1) a 300 megawatt (MW) solar generation facility to be constructed in Warren County (referred to as the "Split Rail Project"); (2) a 50 MW solar generation facility to be constructed in Audrain County (referred to as the "Vandalia Project"); (3) a 50 MW solar generation facility to be constructed in Pike County (referred to as the "Bowling Green Project"); and (4) a 150 MW solar generation facility to be constructed in Cass County, Ill. (referred to as the "Cass County Project").

Staff filed its recommendation on May 23, 2024.

On June 12, 2024, the Commission issued an order approving an agreement to grant the requested CCN subject to conditions.

### Ameren Missouri CCN – Burns Switchyard Case No. EA-2023-0226

On Jan. 13, 2023, Ameren Missouri filed an application with the Commission seeking a CCN to construct, install, own, operate, maintain, and otherwise control a 345 kV switchyard and associated facilities in Callaway County (referred to as the "Burns Switchyard" or "the Project").

Staff filed its recommendation on May 1, 2023.

On June 28, 2024, the Commission issued an order approving an agreement to grant the requested CCN subject to conditions.

### Howard Electric Co-op & City of Fayette Mo. Territorial Agreement Case No. EO-2024-0247

On March 11, 2024, Howard Electric and the City of Fayette filed a Joint Application for approval of a territorial agreement that designates boundaries of exclusive electric service areas for both Howard and Fayette, within Howard County, within and around the city of Fayette.

Staff filed its recommendation on May 1, 2024.

On May 30, 2024, the Commission approved the Joint Application.

### Collaborative Workshop for Non-Residential Rate Design and Related Issues Ordered in Ameren Missouri Rate Case Case Nos. EW-2024-0031 & ER-2022-0337

On June 24, 2023, the Commission issued an order to open a non-residential working case to examine the optional electric vehicles (EV) charging rate proposed by MECG on rate case Case No. ER-2022-0337.

On Aug. 3, 2023, the Commission consulted with Ameren Missouri to conduct the first workshop on Oct. 19, 2023. A second workshop was conducted on Jan. 18, 2024, and a third on May 9, 2024.

### Collaborative Workshop for Customer Education and Outreach Regarding the Introduction of Default Time-of-Use Rates by Evergy Metro, Inc. Case No. EW-2023-0199

On Dec. 21, 2024, the Commission opened a working docket to allow stakeholder collaboration with Evergy Metro, Inc. (Evergy Metro) related to the details of Evergy Metro's Time-of-Use (TOU) rate implementation plan.

On March 28, 2023, Evergy Metro held its first workshop and a second workshop was conducted on May 23, 2023.

On Aug. 10, 2023, Evergy committed to submitting weekly operational metric updates per Commission request.

On Jan. 22, 2024, Evergy Metro requested that its TOU data filings be changed from monthly to quarterly and end after one year of implementation in October 2024. On Feb. 29, 2024, the commission granted Evergy Metro's request to change the frequency of reporting to a quarterly basis.

### Ameren Missouri CCN – New Florence Solar Facility Case No. EA-2024-0212

On May 24, 2024, Ameren Missouri filed an application with the Commission seeking a CCN authorizing it to construct a photovoltaic solar generation plant in Montgomery County, Mo. ("Project" or "New Florence Solar Facility").

On July 30, 2024, Staff filed its recommendation.

This certificate of convenience and necessity case is pending and the evidentiary hearing will be held between Oct. 23, 2024, and Oct. 24, 2024.

### Ameren Missouri Rush Island Securitization Case No. EF-2024-0021

On Nov. 21, 2023, Ameren Missouri filed a petition for a financing order allowing issuance of Securitized Utility Tariff Bonds and request for deferral authority for the retirement of its Rush Island coal-fired generating plant. The petition requested approval of $512,760,332 in Energy Transition Costs and $6,606,609 in Upfront Financing Costs.

Staff, the OPC and other intervening parties filed direct, rebuttal, and surrebuttal testimony. An evidentiary hearing was held from April 12, 2024, to April 19, 2024.

## FUEL AND PURCHASE POWER PRUDENCE REVIEWS

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

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

In fiscal year 2024, Staff completed prudence reviews of fuel and purchased power costs and revenues included in the FACs of Evergy Missouri West (Case No. EO-2023-0277), Evergy Missouri Metro (Case No. EO-2023-0276), and Ameren Missouri (Case No. EO-2024-0053).

Also in fiscal year 2024, Staff initiated prudence reviews of fuel and purchased power costs and revenues included in the FAC of Liberty (Case No. EO-2024-0241). This prudence review had a Staff Recommendation due to be filed on Aug. 30, 2024.

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 Evergy Missouri West, Evergy Missouri Metro or Ameren Missouri.

In Case No. EO-2023-0277, the OPC recommended the Commission Order a disallowance of $86 million for Evergy Missouri West, alleging that it has been imprudent in its resource planning decisions to rely on the SPP energy market to meet the energy needs of its customers instead of building or acquiring cost-effective generation. On Aug. 7, 2024, the Commission filed a Report and Order stating that OPC's request for a disallowance is denied, and that Evergy Missouri West's FAC costs during its eleventh prudence review are prudent.

On March 21, 2024, the Commission issued its Order Approving Staff's Prudence Review for Ameren Missouri's Tenth Prudence Review in Case No. EO-2024-0053.

### 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.

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. Staff is required to conduct a limited review of each triennial compliance filing and file a report not later than 150 days after each triennial compliance filing in accordance with 20 CSR 4240-22.080(7). In accordance with 20 CSR 4240-22.080(B), the utility shall prepare an annual update report to present at an annual update workshop. In accordance with 20 CSR 4240-22.080(C), the utility shall prepare a summary report describing any action items resulting from the workshop and file it within ten days following the workshop. In accordance with 20 CSR 4240-22.080(3)(D), stakeholders may file comments in response to the utility's annual update report within thirty days of the utility's filing of the summary report.

*Missouri State Capitol, Jefferson City.*

Ameren Missouri made its triennial compliance filing on Sept. 26, 2023, in Case No. EO-2024-0020. Staff filed its Staff Report on Feb. 28, 2024, identifying two concerns and its proposed resolutions to its concerns. Staff's resolutions were agreed to by Ameren Missouri. On June 11, 2024, a Joint Filing was made by the stakeholders to the case explaining the stakeholders concerns, alleged deficiencies, and the proposed resolutions. The Commission took no action in response to the stakeholders joint filing.

Liberty made its annual update filing on March 29, 2024, in Case No. EO-2024-0249.  Renew Missouri was the only party to the case that filed comments in response to Liberty's annual update. The Commission is not required to take any action in regards to a utility's annual update filing or stakeholder comments, and did not take any action in this case.

Evergy Missouri Metro and Evergy Missouri West made triennial compliance filings on April 1, 2024, in Case Nos. EO-2024-0153 and EO-2024-0154, respectively. On Aug. 29, 2024, Staff filed its Staff Report and Recommendation identifying five concerns with Evergy Missouri Metro's filing, and on the same date filed its Staff's Report identifying six concerns with Evergy Missouri West's filing. These cases are still pending.

### 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 allow for periodic adjustments in customer rates between general rate cases.

On Aug. 23, 2023, the Commission issued its *Order Approving Non-Unanimous Stipulation and Agreement Regarding the Implementation of Certain MEEIA Programs Through Plan Year 2024 and Approving Tariff Sheets* in Case No. EO-2018-0211, continuing Ameren Missouri's MEEIA Cycle 3 through 2024. On Jan. 25, 2024, Ameren Missouri filed its *Amended and Supplemented Application to Approve DSIM and Demand-Side Management Portfolio and Plan, and Request for Variances* in Case No. EO-2023-0136, to implement its MEEIA Cycle 4 from Jan. 1, 2025 – Dec. 31, 2027. This case is still pending.

On Nov. 16, 2023, the Commission issued its *Order Approving Stipulation and Agreement Extending Evergy's MEEIA Cycle 3 an Additional Year* in Case No. EO-2019-0132, continuing Evergy Missouri Metro and Evergy Missouri West's MEEIA Cycle 3 through 2024. On April 29, 2024, Evergy Missouri Metro and Evergy Missouri West filed its *Application to Approve DSIM Filing and Request for Variance* in Case Nos. EO-2023-0369 and EO-2023-0370, respectively, to implement its MEEIA Cycle 4 from Jan. 1, 2025 – Dec. 31, 2028. These cases are still pending.

On Sept. 14, 2023, the Commission issued its *Order Approving Stipulation and Agreement Extending Liberty's MEEIA Cycle 1 An Additional Year* in Case No. EO-2022-0078, continuing Liberty's MEEIA Cycle 1 through 2024. On April 25, 2024, Liberty filed its *Notice of Intended Case Filing* in Case No. EO-2024-0317, stating that it intended to file a MEEIA Cycle 2 application. Liberty has not yet filed a MEEIA Cycle 2 application.

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

In fiscal year 2024, Staff completed its second MEEIA prudence review of Cycle 3 energy efficiency programs of Evergy Missouri Metro (Case No. EO-2023-0407) and Evergy Missouri West (Case No. EO-2023-0408), and Staff completed its first MEEIA prudence review of Cycle 1 energy efficiency programs of Liberty (Case No. EO-2024-0151). Staff investigated the utilities to determine whether the conduct of the utility's decision-makers was reasonable at the time, under all the circumstances, considering the utility had to make decisions prospectively rather than relying on hindsight.

On Oct. 27, 2023, Staff filed its *Staff's Recommendation* in Case Nos. EO-2023-0407 and EO-2023-0408, identifying disallowances of expenses for administrative program cost expenses, implementation contractors' expenses for both Evergy Missouri Metro and Evergy Missouri West, and Business Demand Response related to Nucor for just Evergy Missouri West. On June 10, 2024, Evergy Missouri Metro, Evergy Missouri West, Staff, and OPC, filed a Unanimous Stipulation and Agreement resolving the issues in the case. Evergy Missouri West agreed to reduce its MEEIA recovery amount by $700,000 in its next DSIM rider filing. On June 26, 2024, The Commission issued its *Order Approving Unanimous Stipulation and Agreement.*

As a result of its MEEIA prudence review initiated in fiscal year 2024, Staff found no incidence or evidence of imprudence for Liberty's first MEEIA prudence review of Cycle 1. On April 24, 2024, the Commission issued its *Order Approving Staff's Prudence Review* for Liberty's first MEEIA prudence review.

## NATURAL GAS

### Procurement Analysis

### 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 LDCs true-up of gas costs for the period under review. A comparison of billed revenue recovery with actual gas costs will normally yield either an over-recovery or under-recovery of the ACA balances to be either returned to customers or charged to customers, respectively.

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

In its prudence reviews, Staff will consider the financial impact on customers of the LDCs use of its gas supply, transportation, and storage contracts in light of the conditions and information available when the operational decisions were made.

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

The Procurement Analysis Department continued to review ACA impacts resulting from the Federal Energy Regulatory Commission's certificate process related to the Spire STL Pipeline.

### Other Proceedings

Although focused largely on natural gas ACA activities, because of its knowledge of natural gas issues, Procurement Analysis Staff also assist in the review of LDC complaint cases, certificate cases, renewable natural gas issues, proposed tariff changes and natural gas rate cases.

Procurement Analysis Staff also assisted in the review of affiliated transactions that impacted the recovery of gas costs.

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

## NATURAL GAS PIPELINE SAFETY PROGRAM

The Commission has safety jurisdiction over intrastate natural and renewable gas pipeline operators in Missouri. In 2023 this included: 14 operators of intrastate transmission pipelines; the distribution natural gas pipeline systems operated by six investor-owned natural gas distribution utilities; 40 municipally-owned natural gas systems; the natural gas distribution line serving Ashley energy; and three master meter systems.

*Natural Gas Pipeline Safety inspection in Springfield.*

In 2023, there were a total of 57 natural and renewable gas pipeline operators over which the Commission had safety jurisdiction, operating approximately 1,000 miles of intrastate natural gas transmission pipelines, over 28,000 miles of distribution main pipelines, and over 1.5 million natural gas service lines.

The Commission's Natural Gas Pipeline Safety Program is carried out under a cooperative agreement with the U.S. Department of Transportation – Pipeline and Hazardous Materials Safety Administration (PHMSA).

The Commission adopts federal pipeline safety regulations and has promulgated some additional, more stringent rules. The primary function of the PSC Safety Engineering Department Staff is to perform inspections and investigations of natural gas pipeline operators and systems for compliance with the Commission's pipeline safety rules. PSC Safety Engineering Department Staff are in the field throughout the year inspecting jurisdictional pipeline operators and systems.

During the 2023 calendar year, PSC Safety Engineering Department Staff conducted more than 120 individual inspections, including comprehensive records and field, compliance follow-up, construction, operator qualification, control room management, transmission and distribution integrity management, anti-drug and alcohol misuse programs, and incident investigations.

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

## NATURAL GAS PIPELINE INVESTIGATIONS

### Spire Missouri, Inc.
### Investigation Case No. GS-2022-0047
### Complaint Case No. GC-2024-0260

On Nov. 15, 2023, Staff filed a report on its investigation into lapsed qualifications for Spire personnel installing mechanical pipeline joints. As a result of its investigation, Staff found sufficient facts and information to assert violations of four of the Commission's Pipeline Safety Standards in 20 CSR 4240-40.030, and made nine recommendations to Spire. At Staff's request, the Commission opened Complaint Case No. GC-2024-0260 to address the alleged violations and Staff's recommendations.

### Spire Missouri, Inc.
### Investigation Case No. GS-2022-0261
### Complaint Case No. GC-2024-0305

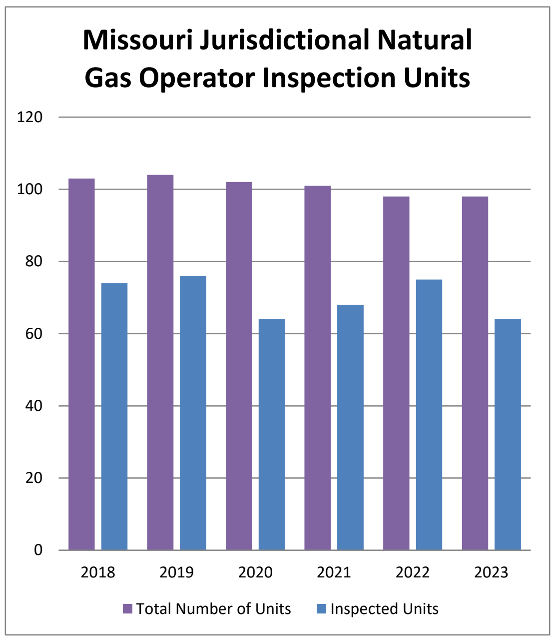
On Jan. 31, 2024, Staff filed a report of its investigation into Spire's timeliness in responding to requests to locate its underground pipeline facilities in response to notifications of intent to excavate. As a result of its investigation, Staff found sufficient facts and information to assert violations of one of the Commission's Pipeline Safety Standards in 20 CSR 4240-40.030, and made 10 recommendations to Spire. At Staff's request, the Commission opened Complaint Case No. GC-2024-0305 to address the alleged violations and Staff's recommendations.

### City Utilities of Springfield, Missouri
### Investigation Case No. GS-2024-0024

Staff is actively investigating a natural gas incident which occurred on July 17, 2023 in Springfield. A release of natural gas occurred when a City Utilities work crew was preparing to perform maintenance on a high-pressure natural gas pipeline. The escaping natural gas ignited, damaging the siding on two nearby homes, City Utilities equipment and vehicles, and nearby electric facilities. The incident occurred in the vicinity of South Charleston Avenue and East Republic Road. Minor injuries to work crew members were reported.

### Spire Missouri, Inc.
### Investigation Case No. GS-2024-0137

Staff is actively investigating a natural gas incident which occurred on Oct. 5, 2023, in Holt. An employee of a contractor working on behalf of Spire was injured while working on Spire's 12-inch high-pressure steel pipeline. Specialized pipeline tapping equipment was used to start the flow of gas in the new pipeline crossing and then to stop the flow of gas in the existing pipeline on either



side of the Muddy Fork. After depressurizing the existing pipeline segment, a short pipe section (approximately 2-feet long) was cut and removed from the pipeline on the west side of Muddy Fork to enable a cap to be installed to seal the pipe. In preparation for cap installation, plugs were being inserted into both open pipe ends. One of the plugs was ejected under pressure, injuring the employee.

## OTHER NATURAL GAS PIPELINE SAFETY CASES

### Spire Missouri, Inc.
### Case No. GE-2023-0112

On Sept. 29, 2023, Staff filed its recommendation that the Commission deny Spire's application for a waiver from certain provisions of the Commission's Pipeline Safety Standards requiring adequate overpressure protection to be provided for all district regulator stations for Spire's low-pressure systems in St. Louis. On Feb. 20, 2024, Staff and Spire filed a joint Stipulation and Agreement to establish a plan to bring Spire into compliance with the requirements of the Commission's Pipeline Safety Standards. The Commission issued an order on March 6, 2024, denying the waiver request and approving the Stipulation and Agreement. Spire is filing quarterly updates on its progress in the Case docket.

### Rule Amendments
### Case Nos. GW-2023-0272 & GX-2023-0422

The Commission has adopted the federal pipeline safety rule amendments pertaining to valve installation, rupture detection standards, pipeline repair criteria, integrity management improvements, cathodic protection, management of change and other related amendments. The amendments to the Commission's Pipeline Safety Standards in 20 CSR 4240-40.030 became effective on March 30, 2024.

## FEDERAL NATURAL GAS AND ELECTRIC CASES

The PSC actively participates in proceedings at the Federal Energy Regulatory Commission (FERC). FERC regulates interstate natural gas and electric companies, and its decisions directly affect Missouri natural gas and electric customers. By actively participating in FERC proceedings, the PSC is able to represent the interests of all Missouri natural gas and electric customers.

The PSC monitors approximately 70 FERC cases on a daily basis. These cases are filed from many different regions of the country and include issues that may affect Missouri consumers.

The PSC filed its notice of intervention (NOI) in 21 FERC cases during the fiscal year ending June 30, 2024. An NOI allows the PSC to become a party and participate in cases before the FERC. As a party to a FERC case, the PSC may file protests or comments, conduct discovery, review confidential case material, submit testimony or other evidence, and participate in settlement negotiations to resolve any issues brought by the parties to the case.

## FEDERAL NATURAL GAS ACTIVITIES

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

Missouri utilities, including both natural gas utilities and electric utilities that generate electricity with natural gas-powered combustion turbines, must rely on FERC-regulated interstate pipelines for storage and delivery of their natural gas supplies. Currently 13 interstate pipelines located within the boundaries of the state are able to serve Missouri utility companies, with an additional four to six upstream pipelines providing transportation and, in some cases, natural gas storage service.

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

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

In this still-active 2017 case, Spire STL Pipeline LLC (Spire) applied for a CCN on Jan. 26, 2017, to construct, own and operate a new interstate natural gas pipeline to serve the St. Louis area. STL Pipeline entered into a precedent agreement with its affiliate local distribution company, Spire Missouri, for firm transportation capacity to serve Spire's natural gas customers.

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

The PSCs conditional protest requested that FERC thoroughly examine all of the circumstances and impacts of the proposed pipeline. The PSC urged FERC to respect traditional state jurisdictional decision-making authority, and raised concerns regarding Spire STL Pipeline's requested return on equity (ROE), capital structure, and the potential shifting of the project's financial risk from the pipeline to its customers. FERC approved the CCN, noting that the prudence and reasonableness of Spire Missouri's decision to enter the precedent agreement and obtain transportation service from Spire STL Pipeline fell within the jurisdiction of the PSC.

The majority of the pipeline is sited in Illinois, connecting to the Rockies Express Pipeline to provide the St. Louis area with access to shale gas from the eastern United States.

On Oct. 28, 2019, FERC issued an order amending the CCN and approving a rate increase for additional construction costs associated with flooding along the Missouri and Mississippi rivers in 2019. Spire STL Pipeline commenced service on Nov. 18, 2019, for portions of the pipeline located in St. Louis and St. Charles counties in Missouri and Scott, Greene and Jersey counties in Illinois.

Spire STL Pipeline experienced a number of delays in completion of the pipeline. In May 2020, Spire STL Pipeline requested a one-year extension of time to complete the project, citing suspension of construction activities due to COVID-19. On June 18, 2020, FERC granted Spire's request for a one-year extension through Aug. 3, 2021, to complete and put into service the last section of the pipeline. On Oct. 30, 2020, FERC granted Spire STL Pipeline's request to place the remaining facilities into service on Nov. 4, 2020.

On Jan. 23, 2020, the Environmental Defense Fund filed a petition for review of FERC's CCN Order in the U.S. Court of Appeals for the District of Columbia Circuit. On June 22, 2021, the Court of Appeals vacated the CCN Order and remanded the case to FERC for further consideration. On July 26, 2021, Spire filed an application for a temporary certificate to avoid a possible disruption in service. The PSC filed limited comments in support of a temporary certificate to continue service to customers while FERC decided the remanded case. On Sept.14, 2021, FERC issued a temporary certificate for 90 days while it considered action on the remand/vacate order from the Court of Appeals.

On Dec. 3, 2021, FERC ordered the temporary certificate to remain in place until it issued a final order on remand. Over a year later, on Dec. 15, 2022, FERC issued a permanent certificate, which was not ultimately appealed to the U.S. Court of Appeals. In compliance with the Dec. 15th CCN order, Spire STL Pipeline continues to file weekly status and corrective action reports to FERC regarding its ongoing work with Illinois landowners to resolve land restoration issues, and to respond to various directives from FERC on landowner issues. Spire also continues to file Quarterly Compliance Reports with the most recent report filed on June 4, 2024. The PSC continues to monitor the case.

## Panhandle Eastern Pipe Line Company (Panhandle) FERC Docket Nos. RP19-78 & RP19-1523

On July 18, 2018, FERC issued Order No. 849 requiring natural gas pipeline companies to file FERC Form No. 501-G to assist FERC in determining which jurisdictional natural gas pipelines may be collecting unjust and unreasonable rates in light of the income tax reductions provided by the 2017 Tax Cuts and Jobs Act. FERC subsequently instituted an investigation of the rates for Panhandle (RP19-78) and its affiliate, Southwest Gas Storage Company (Southwest) (RP19-257) after finding that information provided on their 501-G forms indicated both entities may have been substantially overearning and collecting unjust and unreasonable rates.

The PSC intervened in both investigation cases with at least 35 other parties, including Ameren Missouri and Spire Missouri. The Southwest investigation case settled with a $6 million rate reduction. However, the issue of a negotiated contract between Southwest and Panhandle

(Southwest's only customer) was consolidated with the Panhandle investigation. Panhandle filed a rate case on Aug. 30, 2019, (RP19-1523) seeking a cost of service of $408 million.

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

In its rate case, Panhandle sought recovery of the full cost of its negotiated contract with Southwest, which would have eliminated the benefit of the Southwest rate reduction settlement in RP19-257 from Panhandle's cost of service, meaning that Panhandle's customers would never realize the $6 million reduction in Southwest's storage rates.

The FERC Staff filed testimony in the Panhande rate case supporting a $236 million cost of service, $172 million less than requested by Panhandle. Several Panhandle customers (including Ameren Services, an affiliate of Ameren Missouri), customer groups (including municipal and industrial customers), the Michigan Public Service Commission and the PSC intervened and also filed testimony challenging various elements of Panhandle's cost of service. The intervening parties primarily focused on Panhandle's requests regarding return on equity (ROE), accumulated deferred income taxes (ADIT), depreciation/negative salvage, operation and maintenance costs, and storage costs. Small customer transmission rates for a number of municipal gas systems in Missouri are also affected by Panhandle's rate case.

The Panhandle rate case hearing began on Aug. 25, 2020, and continued for several weeks. The FERC administrative law judge (ALJ) presiding over the case issued an Initial Decision on March 26, 2021. The Initial Decision recommended an ROE of 11.43 percent, a reduced cost of service, and lower rates for depreciation and net salvage. The ALJ specifically relied on testimony filed by the PSC in her recommendation to uphold FERC precedent preventing affiliate abuse and to reduce Panhandle's annual recovery of costs for its affiliate Southwest by approximately $6.7 million, thereby restoring the benefit of the Southwest rate settlement to Panhandle's customers.

Following the Initial Decision on May 26, 2021, the PSC and other parties filed briefs regarding the Initial Decision. On Dec. 16, 2022, FERC issued Opinion No. 885 and Order on Initial Decision. In the Order, FERC agreed with the Initial Decision to uphold FERC precedent preventing affiliate abuse and to reduce Panhandle's annual recovery of costs for its affiliate Southwest by approximately $6.7 million. The Order also reduced Panhandle's ROE from the 11.43 percent recommended in the Initial Decision to 11.25 percent. FERC reversed the Initial Decision related to excess deferred income taxes (EDIT) and ADIT as well.

On Jan. 17, 2023, Panhandle requested rehearing of Opinion No. 885. Panhandle opposed numerous parts of the Opinion including the normalization of storage gas balances, the AFUDC equity cost rate, ADIT/EDIT, capital structure, ROE, depreciation and salvage rates, discounted contract rate treatment, and storage contract requirements. FERC denied Panhandle's rehearing request on Feb. 17, 2023. On March 23, 2023, Panhandle filed a Petition for Review of Opinion 885 (D.C. Circuit No. 23-1080). The PSC has intervened in the appeal.

On Feb. 14, 2023, Panhandle filed its Opinion No. 885 Compliance Filing and subsequently filed an amended Compliance Filing on Feb. 27, 2023, to correct an error. FERC issued an Order Accepting Compliance on May 26, 2023, and directed Panhandle to file actual tariff records within 30 days of the Order date. Pursuant to the May 26th Order, Panhandle made its tariff filing on June 26, 2023. On the same day, Panhandle filed for rehearing of the Order Accepting Compliance. FERC denied Panhandle's request for rehearing Order on July 27, 2023, by operation of law. Panhandle filed a Petition for Review of Order Accepting Compliance on Aug.15, 2023 (D.C. Circuit No. 23-1220).

On Sept. 25, 2023, FERC issued Opinion No. 885-A which modified the discussion of Opinion No. 885 but did not change the outcome. The Opinion addressed the rehearing requests of Opinion No. 885 and rejected Panhandle's June 26, 2023, compliance filing. FERC directed a further compliance filing to remove language Panhandle added to its tariff purporting to grant the pipeline the ability to collect the rates plus surcharges and interest if a rehearing of Opinion No. 885 was granted. Panhandle filed its revised compliance filing on Sept. 29, 2023, and FERC accepted it on Oct. 23, 2023.

On Oct. 25, 2023, Panhandle filed for a Limited Request for Rehearing of Opinion No. 885-A stating the Commission erred in requiring the removal of the surcharge and interest language. In response to Panhandle's rehearing request, FERC issued Opinion No. 885-B, sustaining the results of Opinion No. 885-A.

Panhandle filed a Petition of Review of Opinion No. 885-A on Nov. 16, 2023 (D.C. Circuit No. 23-1319) and a Petition for Review of Opinion No. 885-B on Jan. 11, 2024 (D.C. Circuit No. 24-1005). All of Panhandle's appeals have been consolidated at the D.C. Circuit and remain in abeyance pending FERC's final decision in the case.

Panhandle filed its refund report with FERC on Nov. 30, 2023. Several protests were filed in response that questioned the methodology that Panhandle used in calculating the refund amounts. On May 28, 2024, FERC issued an order rejecting Panhandle's refund report and directed the pipeline to recalculate the refunds and file a corrected refund report. On June 27, 2024, Panhandle filed the revised refund report and filed a request for rehearing of the May 28, 2024 Order. Panhandle is challenging the methodology adopted by FERC in the calculation of refunds to customers. The PSC will continue to monitor this case and the pending appeals.

### Texas Eastern Transmission, L.P. (Texas Eastern)
### Pre-packaged Settlement
### FERC Docket No. RP24-815-000

Texas Eastern is a major interstate pipeline owned by Energy Transfer LP transporting natural gas from production areas in Texas, Louisiana and the Gulf of Mexico through several states, including southeast Missouri, to the mid-Atlantic and Northeast United States. Ameren Missouri (Cape Girardeau area) and Liberty (Boot Heel area) transport gas on Texas Eastern. Texas Eastern accounts for about 14 percent of Ameren's portfolio in the area. Texas Eastern's most recent rate case was resolved by stipulation in September 2022.

Texas Eastern initiated rate negotiations in December 2023, prior to filing a case at FERC. The PSC participated in the negotiations. The settlement provides Texas Eastern with a 6 percent rate increase effective Oct. 1, 2024, and an additional 2.75 percent increase effective January 2026. The settlement reserves issues related to the pipeline's ADIT/EDIT balances until the next rate case, and maintains many of the provisions of the 2022 rate settlement. Texas Eastern filed the negotiated settlement with FERC on June 3, 2024. No party has filed in opposition. The settlement is awaiting approval by FERC.

### ANR Pipeline Company (ANR)
### FERC Docket No. RP22-501

On Jan. 28, 2022, ANR filed its rate case with FERC and requested a total cost of service of $1.125 billion, an increase of approximately $200 million over the company's 2016 rate filing. ANR also claimed a rate base of more than $3.4 billion, requested an ROE of 15.70 percent, and requested a modernization tracker to recover the cost of additional upgrades it planned to make in future years. The PSC intervened on March 3, 2022. ANR's rates were placed into effect by motion on Aug.1, 2022. The parties filed testimony, convened several settlement conferences and reached a settlement in mid-November 2022. ANR filed a stipulation and agreement at FERC on Nov. 29, 2022, and the settlement was approved by FERC on April 11, 2023.

The settlement divided ANR's rate increase into two periods. Period One rates reflect an increase of 13 percent over pre-filed transmission reservation rates and a 3.6 percent weighted average increase to storage reservation rates. Period One rates took effect as of Aug. 1, 2022. Period Two rates will become effective when ANR places two new compressor station replacement units into service, but per the terms of the Order, may not be earlier than Aug. 1, 2024. Period Two rates will reflect an additional 2 percent increase in transmission rates and no additional increase in storage rates. The rate increase is slightly smaller for Missouri municipalities, which take service on ANR's Schedule STS for small customers. The STS increase is about 12 percent in Period One and an additional 1 percent in Period Two. STS customers do not pay an additional charge for storage services. The settlement results in an annual savings of approximately $5.8 million for Period One and $5.7 million for Period Two versus ANR's requested rates. On June 28, 2024, ANR filed a motion to place Period Two rates into effect on Aug. 1, 2024, which FERC approved on July 18, 2024.

### Tallgrass Interstate Gas Transmission (TIGT)
### FERC Docket No. RP24-457

TIGT is a natural gas pipeline which brings gas from the states of Wyoming and Colorado into Missouri and Kansas. The pipeline enters Missouri at two points on the western border, one in Kansas City and one approximately 40 miles to the south. TIGT serves one customer in Missouri – Spire Missouri, Inc. (Spire West).

On Feb. 29, 2024, TIGT filed its annual Fuel and Lost and Unaccounted For (L&U) Reimbursement filing. The PSC intervened on March 12, 2024. TIGT filed an amendment on March 15, 2024, to update billing factors. The PSC reviewed Tallgrass' fuel filing, and determined that Tallgrass had included in its L&U percentage calculation a gas loss that was not properly recoverable through L&U gas volumes. The gas loss in question results from an incident Tallgrass reported to the federal PHMSA.

The PSC filed a Conditional Protest in the docket and requested that TIGT remove the incident-related gas loss from their L&U calculations. On March 27, 2024, TIGT made an amended filing with updated L&U reimbursement factor calculations that reflected the removal of the gas loss in question. FERC accepted the amended filing on April 26, 2024.

### Other FERC Cases

The PSC continues to intervene and participate in natural gas pipeline cases that involve gas that pipelines claim is "lost and unaccounted for." Pipelines make annual or semi-annual filings updating FERC on the percentage of natural gas the pipelines retain for use on their systems, or for natural gas that is lost and unaccounted for during a pipeline's normal operations. A pipeline can recover the cost of lost and unaccounted for gas from its customers.

The PSC protests these filings to ensure pipelines do not improperly include natural gas lost due to incidents such as storm damage or valve failures in their calculations of gas that is lost and unaccounted for. In these types of incidents, the natural gas losses are known, measurable and non-recurring, so the lost gas is not "unaccounted for" and the cost of that gas should not be recovered from customers. The PSC has been successful in protesting these cases, as FERC has agreed that these incident-related losses should not be included in the "lost and unaccounted for" calculation (most recently in FERC Docket No. RP24-457 for Tallgrass Interstate Gas Transmission). As a result, more pipelines exclude these incident-related losses in their initial lost and unaccounted for percentage calculation filing.

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

## FEDERAL ELECTRIC ACTIVITIES

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

### MISO Transmission Customers v. MISO Transmission Owners
### FERC Docket Nos. EL14-12 & EL15-45

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

The PSC intervened in this case and contributed to the comments filed by the Organization of MISO States (OMS). The PSC also assisted in developing the parties' litigation strategy prior to the August 2015 hearing. The initial decision issued by the FERC ALJ on Dec. 22, 2015, recommended a reduced ROE of 10.32 percent and ordered refunds to transmission customers for the difference collected plus interest. FERC issued a decision in this case on Sept. 28, 2016, supporting the initial decision. The refund period covered revenues that MISO transmission owners collected from Nov. 12, 2013, through Feb. 11, 2015. Refunds were issued to MISO members in February 2017, including Ameren Missouri.

Because FERC rules only allow refunds covering a 15-month period in electric complaint cases, MISO transmission customers filed a second complaint case (EL15-45) in February 2015 seeking refunds for the period from Feb. 12, 2015, through May 11, 2016. The arguments expanded on those filed in EL14-12 and extended the discounted cash flow (DCF) analysis period used in determining the base ROE.

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

In November 2018, FERC requested participants to the EL14-12 and EL15-45 proceedings to submit briefs regarding FERC's proposed changes to the method used to analyze the ROE component of rates for public utilities under its jurisdiction. FERC's reconsideration of its ROE method stems from a 2017 decision by the U.S. Court of

Appeals for the District of Columbia Circuit vacating and remanding FERC's Opinion No. 531, in which FERC set the ROE for New England Transmission Owners at the midpoint of the upper half of the zone of reasonableness produced by a two-step discounted cash flow (DCF) analysis. The PSC, along with the Mississippi Public Service Commission, the Missouri Joint Municipal Electric Utility Commission and other aligned parties, filed initial briefs to FERC in February 2019 and reply briefs in April 2019.

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


*FERC building, Washington, DC*

In Opinion No. 569, FERC applied its revised ROE methodology to both the EL14-12 and EL15-45 complaint cases, but denied refunds in the EL15-45 case. Both cases were decided together, but with different FERC rulings in Opinions 569 and 569-A and 569-B. On Aug. 9, 2022, the D.C. Circuit Court of Appeals issued an opinion, *MISO Transmission Owners v. FERC*, finding that the Federal Energy Regulatory Commission's use of a "Risk Premium" model as one of the three models to determine a just and reasonable return on equity (ROE) for wholesale electric transmission rates was arbitrary and capricious. Thus, the court vacated the underlying orders (Opinion Nos. 569-A and 569-B) and remanded for FERC to reopen the proceedings. FERC did not reopen the case in calendar year 2023, but appears to be ready to do so in the latter part of 2024. The PSC continues to participate in these cases and does not expect a final resolution until the end of 2024 or later.

### Wabash Valley Power Association, Inc. FERC Docket Nos. ER23-255, ER10-1257 & EL24-16

On Oct. 26, 2022, Wabash Valley made a filing with FERC to amend its formula rate tariff. The filing would reset the cost of its combustion turbine in the demand rate, shorten the peak billing window, create a Super Off Peak Billing Window, add a fixed charge to recover stranded costs with certain approved stranded assets, and move certain RTO transmission related costs (Schedule 26A) billed to Wabash on an energy basis to energy costs instead of demand costs. Tipmont Rural Electric Membership Corporation (Tipmont) and Citizens Electric Corporation (Citizens), a Missouri corporation, filed protests in the case. Both Tipmont and Citizens are members of Wabash Valley and receive generation and transmission services from Wabash. The Tipmont and Citizens protests raised similar issues, including the shifting of costs to members with larger loads. The protests alleged that the costs to purchase power for members are aggregated and socialized, which causes large load members in MISO zones to subsidize other Wabash members because certain MISO zones have lower rates than other zones. The protests also raised issues related to Wabash's formula rate design, the lack of transparency, and an agreement that allows Wabash Valley to change rates during a formula rate year, which generated the opening of a FERC complaint case (EL24-16), and other requests in ER10-1257 on related subjects between the parties.

Citizens serves customers in and around Perryville, including Proctor & Gamble, Mississippi Lime Company, Gilster-Mary Lee Corp., the Perryville and St. Genevieve Public Schools, and the Perry County Hospital. The PSC filed an intervention in the case on Feb. 6, 2023.

The PSC attended and participated in settlement negotiations until FERC terminated the settlement judge procedures on Oct. 3, 2023. FERC adopted a procedural schedule and various parties filed testimony.

Parties in the cases agreed to resume settlement negotiations and on May 31, 2024, Wabash Valley submitted an Unopposed Motion to Hold Proceeding in Abeyance. The Chief Judge granted the requested 90-day abeyance on June 3, 2024. The MoPSC continues to monitor the case and participate in the settlement negotiations.

### Building for the Future Through Electric Regional Transmission Planning and Cost

### Allocation
### FERC Docket No. RM21-17

On July 15, 2021, FERC issued an Advance Notice of Proposed Rulemaking to discuss potential reforms to improve the electric regional transmission planning and cost allocation and generator interconnect processes. The PSC intervened in the docket on July 6, 2021.

FERC held a technical conference on Nov. 15, 2021. On Nov. 17, 2021, FERC requested post-technical conference comments. Multiple comments were received through February 2022. On April 20, 2022, FERC filed Notice of Proposed Rulemaking (NOPR) intending to reform both the RTO tariff and Large Generator Interconnection Agreements to remedy deficiencies in the Commission's existing RTO planning and cost allocation requirements. Comments were received and a final order (Order No. 1920) was issued on May 15, 2024.

Several comments, requests for clarification and/or rehearing were filed. The PSC filed a letter on June 17, 2024, requesting that FERC reevaluate certain aspects of the final rule. The PSC was concerned that Order No. 1920 made a departure from the NOPR and longstanding cost allocation principles in ways that diminish the roles of Missouri and other states in transmission planning. The FERC denied the requests for rehearing by operation of law on July 15, 2024. The PSC continues to monitor the case.

## REGIONAL TRANSMISSION ORGANIZATIONS ACTIVITIES

Regional Transmission Organizations (RTOs) primarily oversee and manage the electric power flowing across the Bulk Electric Grid (Grid) within the defined footprints of their respective utility members, and administer interstate wholesale electrical markets that minimize the costs of operating their respective utility footprints. The PSC regularly participates in and contributes to the stakeholder processes of the two RTOs operating in Missouri: the Midcontinent Independent System Operator (MISO); and, the Southwest Power Pool (SPP). The PSC also participates in the MISO Regional State Committee, known as the Organization of MISO States, (OMS) and the SPP Regional State Committee (RSC). The PSC participates in the respective RTO stakeholder processes and activities to ensure Missouri electric ratepayers and customers receive reliable and safe services at reasonable rates now and in the future.

RTOs were established under the Federal Power Act, Title 16 USC §824, and are regulated by the Federal Energy Regulatory Commission (FERC). RTOs are charged to:

- Operate the interstate Bulk Electric Transmission Grid (the Grid) at the least system cost.
- Plan for upgrades to, and expansions of the Grid.
- Manage federal wholesale bulk electric markets through which utilities buy and sell electricity.
- Aid in the conservation of electric power.
- Ensure reliable supplies of electric power are available to their member utilities.

The PSC Regulatory Analysis Department's Bulk Regional Transmission Unit (BRTU), a part of the General Counsel Division, provides updates and briefings on RTO and FERC activities to PSC Commissioners and spearheads the PSCs monitoring of, and interactions with, the RTOs to promote Missouri's interests.

### Midcontinent Independent System Operator (MISO)

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

MISO manages about 75,000 miles of high voltage transmission lines in the mid-western United States, conducts on-going Grid expansion planning, operates wholesale day-ahead and real-time energy markets and for calendar year 2023 managed energy transactions exceeding about 614 million megawatt hours, valued in excess of $40 billion. MISO has dispatch control of more than 2,956 generating units representing in excess of 191 gigawatts of nameplate generating-capacity. MISO also coordinates inter-RTO grid management with other RTOs and non-RTO utilities such as the SPP, the Tennessee Valley Authority, the Southern Companies, and Associated Electric Cooperatives, Inc.

The Commission and its staff advocate for Missouri's interests within the MISO by participation in MISO's numerous stakeholder-working groups, by providing informal comments to the working groups and more formally through the Organization of MISO States (OMS) as it provides comments to MISO and the FERC. Commissioner Jason Holsman represents the PSC to the OMS and serves as the OMS Liaison Commissioner for Distributed Energy Resources.

MISO became a Regional Transmission Organization in 2001, and is a 501 (c) (4) not-for-profit corporation chartered in Delaware with offices in Carmel, Ind. MISO was founded in 1998.

## MISO Long-Range Transmission Plan

MISO's Long-Range Transmission Plan (LRTP) is a forward-looking response to changes in its members' announced company goals and generation fleets, integrated resource plans filed with their members' respective states, and state and federal statutes to meet forecasted load and load growth with new transmission and a more remote and diversified generator fleet.

The LRTP Tranche 1 was approved by the MISO Board of Directors in 2022 and is set to be comprised of four Tranches. Tranche 1 consists of 18 competitively bid projects valued at about $10.3 billion. Ameren Transmission Company of Illinois (ATXI) in partnership with the Missouri Electric Commission was awarded the right to build one of the projects which includes two substations and two 345 kilovolt (KV) transmission lines, one from the Iowa state line 42 miles to the Denny substation and the other from Denny to a new substation and eastward about 345 miles to the Maywood substation. MISO estimated the value of those facilities at about $1.5 billion. Construction has not begun as of this writing.

LRTP Tranche 2 was developed to meet expected reliability needs as far forward as 2042 under a number of forward-looking scenarios, in which utilities and states' announced reliability and resource adequacy goals are met. Finalized Tranche 2 transmission needs are expected to be reviewed and considered for approval by the MISO Board of Directors in December 2024; however, a proposed 345 KV line interconnecting with the Tranche 1 Missouri project and running from the Hannibal area to north of St. Louis has been offered for consideration. Currently Tranche 2 costs are estimated somewhere between $17-$23 billion.

## Seams

Seams are where different RTO and other transmission planning regions, such as AECI, boundaries meet. PSC continued to both lead and monitor seams issues in fiscal year 2022. Much of the discussion in FY2022 was on the fifth and final recommendation from the joint SPP RSC – OMS Seams Liaison Committee on rate pancaking and unreserved usage charges. After multiple years of discussion, a whitepaper including potential solutions is expected to be developed by MISO and SPP staffs, but as of the conclusion of FY 2024, that whitepaper has yet to be completed.

The PSC filed the following comments with the following requests as suggested issues to be worked on in the 2024 MISO-SPP Interregional Planning Stakeholder Advisory Committee:

(1) Examine the four-state region (Missouri, Kansas, Oklahoma Arkansas) in and around Southwest Missouri and look for possible seams projects. To the extent we have previously examined the four-state region around Southwest Missouri multiple times and not identified a project, we should conduct a three-way study process involving MISO, SPP and AECI to fully explore projects that benefit all three regions.

(2) Examine the region of the LRTP 1 projects in Northern Missouri and the currently proposed JTIQ projects along the Northern MISO-SPP seam for possible seams projects connecting or supporting those lines.

(3) Refocus on and finish the rate pancaking / unreserved usage white paper from MISO and SPP that had been intended to be completed by the end of 2023. Consider solutions such as the "dead band" solutions previously discussed in the SPP stakeholder process. Solving this issue may facilitate more interregional project approval.

(4) Targeted Market Efficiency Projects (TMEPs) – Because of the past successes of this project type along the MISO-PJM seam, it is suggested to simply adopt or borrow the MISO-PJM TMEPs' project type. Conduct a study of what this project type would look like and what parameters it would conform to in the area of cost allocation, or alternatively, look at the possibility of doing a TMEPs study even if there is no established cost allocation methodology for TMEPs on the SPP-MISO seam. Either way, look at all possibilities and strategies necessary for implementing a TMEPs project type on the MISO-SPP seam.

(5) Please consider project types that do not have a preset cost sharing arrangement between MISO and SPP in the 2024 study. There is no prohibition against MISO and SPP filing a "one-off" cost allocation methodology at FERC for how to share costs between MISO and SPP. Any projects that can separately pass the SPP and MISO regional processes should be studied even if there isn't an existing interregional cost sharing mechanism. All avenues to explore potential one-off solutions should be evaluated and vetted so that they may be considered in terms of overall benefits to both grids.

As of the end of FY 2024, MISO and SPP have yet to release a scope of the 2024 Coordinated System Plan.

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

### Joint Targeted Interconnection Queue (JTIQ)

Fiscal year 2022 saw further developments on the Joint Transmission Interconnection Queue (JTIQ) project between SPP and MISO. JTIQ is intended to provide analysis and a cost allocation methodology for transmission projects intended to allow additional generators to connect to the power grid along the MISO-SPP seam. As of the end of fiscal year 2022, JTIQ included a project in the Kansas City area.

In fiscal year 2022, parties worked to secure funding from the U.S. Department of Energy to pay for a portion of JTIQ projects, which are estimated to cost over $1 billion. Both newly connecting generators and load in the footprints of MISO and SPP would pay using a formula that was agreed upon by stakeholders for the remainder of projects.

In fiscal year 2022, MISO and SPP stakeholders, including PSC, worked to finalize cost allocation methodology and tariff language for a future filing at FERC. Work continued on this topic through FY 2023 and FY 2024. While tariff filings were being developed at the end of FY 2024, no tariff had been filed as of the end of FY 2024. Ultimately, the U.S. Department of Energy's Grid Resilience and Innovative Partnership grant was awarded to the projects and will pay for the ratepayer's share of the JTIQ costs.

### Market Reform

Given the industry's transition to intermittent generating resources (wind, solar, and storage) MISO determined its Resource Adequacy protocols required reform to minimize the risk of losing load. These reforms include changes in: the Planning Resource Auction (PRA); Resource Accreditation; the PRA Reliability Based Demand Curve; and, the Scarcity Pricing mechanism.

FERC authorized MISO to reform its PRA in FY 2023. The PRA reform involved moving from a single annual auction setting a capacity planning requirement based on the peak usage day of the year (hottest day of the summer) to seasonal auctions (summer, fall, winter and spring) where the planning requirements would be based on when the risk of losing load was greatest (in each season).

### Resource Accreditation

MISOs Resource Accreditation proposal currently pending before FERC in Case No. ER24-1638-000, provides for a three-year transition period at the end of which conventional resources (coal and gas-fueled resources, nuclear and hydro (all forms)) and renewables (wind, solar and storage) will be accredited using the same methods. In the first and second years of the transition, all resources will be accredited as they have been historically. In the third year, the accreditation process will involve a two-step process. This new process seeks to determine whether a generator was available to the system during the high risk seasonal hours, and provide compensation to the generator owners based on performance during those hours.

The first step, called Direct Loss of Load (DLOL), uses a statistical modeling technique which captures the variability of the weather, economic activity, and generator planned and forced-outage rates to produce a series of "risk" hours and determines the contribution to the MISO system of each generator-class-type. Individual generators are not modeled.

The second step, based on historical individual resource contributions to the MISO system during actual, high-risk hours, determines a contribution factor for individual generators. This factor when combined with the contribution of its generator class is used to allocate a share of the DLOL class contribution to individual resources, thereby accrediting the generator.

MISO requested a transition period which would begin for the new accreditation process starting July 1, 2028.

### Reliability Based (Sloped) Demand Curve (RBDC)

As one of MISOs Resource Adequacy reforms, MISO determined its Planning Resource Auction's (PRAs) use of a vertical demand curve produced inefficient capacity prices, sent inaccurate investment signals to PRA participants, incented capacity over- or under-building, and diminished reliability by failing to recognize the reliability contributed by the marginal unit. MISOs Market Monitor advocated replacing the vertical demand curve with a Reliability Based Demand Curve (i.e., a downward sloping demand curve) which would produce efficient capacity prices, send more accurate investment signals, provide accurate incentives to build capacity and properly value the reliability contributed by the marginal resource.

Throughout CY 2022 and 2023 MISO conducted stakeholder discussions, including BRTU staff and OMS members, regarding its numerous RBDC proposals. MISO submitted its RBDC proposal to FERC in Case No. ER23-2977-000, in September 2023. FERC approved the RBDC proposal on June 3, 2024. MISO will implement the proposal in Planning Year 2025/2026.

### Scarcity Pricing Reform and Forced-off Asset Reforms

MISO continued work on its scarcity pricing reform initiative through FY 2024. MISO Scarcity Pricing is the pricing method used when there is not enough capacity to serve load during an energy emergency and reserve capacity is required to make up the deficiency. Scarcity pricing is intended to incent energy conservation during emergencies, provides a range of energy prices to be imposed to compensate reserve resources when they are called upon to provide energy and to incent other resources to make their resources available to MISO for the pendency of the shortage or emergency. MISO has outlined its reforms as follows and so far in the process has accomplished the following:

- Proposed a range of prices, and settled on a minimum scarcity price of $600/megawatt hour and a maximum value of $10,000/megawatt hour, which is referred to as the Value of Lost Load.
- Is developing a circuit breaker to reduce the Value of Lost Load (VOLL) when it becomes apparent that the VOLL is not serving its purpose-to incent additional capacity to make itself available to MISO during the emergency. The proposed circuit breaker will reduce prices from $10,000 to $5,000 per megawatt hour after four hours or when the emergency persists for longer than one day.
- Is targeting filing the Scarcity Pricing Proposal with FERC in October 2024.

MISO also filed tariff changes in February 2024 with an effective date of June 3, 2024, to effect changes in its financial settlement rules which govern how load is charged for service when it experiences a forced transmission outage resulting in extreme operational and financial impacts. These changes relieve load from the obligation to pay for power it does not receive and ensures generation is compensated for its costs when it complies with MISO dispatch instructions under those same conditions. Such load is referred to as a Forced-off Asset.

The BRTU staff chaired the Organization of MISO States' Market Working Group review of the Scarcity Pricing proposal and coordinated feedback submitted to MISO from the OMS working group. When the proposed filing is submitted, OMS may submit formal comments to FERC either in support of or opposition to the filing.

### Southwest Power Pool (SPP)

Three Missouri jurisdictional investor-owned electric utilities are members of SPP: Evergy Missouri Metro; Evergy Missouri West; and Liberty Utilities. City Utilities of Springfield, Independence Power and Light, many smaller Missouri municipal utilities, the Missouri Electric Commission (formerly the Missouri Joint Municipal Electric Utility Commission), independent power producers and independent transmission companies are also members of, or participate in, SPP and its bulk wholesale energy markets.

The SPP serves transmission-owning utilities, transmission dependent utilities, cooperatives and municipalities across 13 legacy-SPP states and continues to pursue expanding into the western interconnect. SPP is also establishing a Markets+ product intended to function in the western interconnect much as its day-ahead energy market does in the legacy SPP footprint. Currently, SPP exercises functional control in relation to:

- Over 967 generating plants which produced nearly 283,577 gigawatt hours of power in 2023;
- Over 72,800 miles of high-voltage transmission lines and facilities;
- Conducts ongoing transmission expansion and upgrades planning;
- Coordinates local electric utilities and cooperatives activities;
- Conducts inter-RTO operations; and
- Manages federal utility compliance services with FERC for its 324 market participants.

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

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

The RSC has been an active participant in the many special SPP taskforces such as the Rate Impact Task Force, Regional Allocation Review Task Force, and Holistic Integrated Tariff Team. The RSC created a new taskforce, the Resource and Energy Adequacy Leadership team. The RSC also, has one subordinate working group, the Cost Allocation Working Group (CAWG), on which the BRTU staff serves. The CAWG performs a research and monitoring roll for the RSC and performs other duties as needed by the RSC.

The PSC was represented at the beginning of FY 2024 on the RSC by Chairman Scott Rupp. On May 6, 2024, Chair Kayla Hahn took over as the Missouri representative on the SPP RSC.

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

## Safe Harbor for New Service Requests in SPP

CAWG initiated its review of the SPP "Safe Harbor" in fiscal year 2023. SPPs Safe Harbor represents a dollar amount of transmission upgrades used to provide service in response to a new transmission service request to connect a generator to the electric grid. If the transmission service request provides benefits to the SPP region as well as to the original requestor and satisfies the requirements discussed below, it is eligible for "Safe Harbor" treatment, that is, all or part of the cost of the transmission upgrade is shared among the entire SPP region.

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

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

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

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

CAWG and RSC members are expected to debate and suggest any possible changes to the "Safe Harbor" dollar amount and/or eligibility criteria in early fiscal year 2025.

On Oct. 30, 2023, the RSC approved a policy change to modify the Resource/Load Condition of the Safe Harbor Provisions in SPPs Open Access Transmission Tariff Attachment J, Section III.B.1.b from 125 percent to (100 percent + the higher of summer or winter season PRM + 10 percent), but not less than 125 percent. Subsequent to the RSC's approval, the CAWG developed the required revisions to the tariff, which were not yet filed at FERC at the end of FY 2024.

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

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

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

In July 2022, the SPP staff re-studied the results of its most recent LOLE using actual, historical data (post Winter Storm Uri) rather than the forward-looking, statistical data it had used in its original study and determined that the SPP PRM, then at 12 percent, needed to be immediately increased to 15 percent. Stakeholders acknowledged the need to increase the PRM while opposing the immediate implementation of the increase. The SPP Regional State

Committee and the SPP Board of Directors authorized the increase in the PRM in October 2022. In the most recent SPP studies of the PRM, all SPP load serving entities have been able to meet the increased PRM.

In FY 2024, discussions continued about possible increases to the PRM, including creating a separate Winter PRM (see below). As of the end of FY 2024, no changes have been made.

### Winter Season Resource Adequacy Requirement

The SPP PRM is a requirement of the SPP tariff and applies to all seasons of the year. However, the PRM penalty only applies to the summer season and is imposed only when a LSE fails to satisfy the PRM in the summer. In the winter, the PRM was treated as an obligation but not a requirement. Given the results of the recently reviewed LOLE and subsequent analysis, the SPP staff raised generator outage concerns when it proposed increasing the PRM. SPP staff also proposed treating the winter and summer seasons identically by making the PRM a winter-season requirement subject to penalty. Stakeholder-involved work started on this round of PRM requirements in July 2022 and involved utility staff, regulatory (state staff and RSC members) staff and SPP staff and management.

### SPP Consolidated Planning Process Taskforce (SCRIPT)

In fiscal year 2024, SPP continued its implementation of several SCRIPT initiatives (which were goals related to generator and transmission improvement issues), especially with the Consolidated Planning Process Task Force (CPPTF). The CPPTF has a goal of combining the planning of generator owner-benefiting and consumer-benefiting transmission projects into one simultaneous process. A member of the MoPSC BRTU was appointed to the task force to provide the Missouri and state regulator perspective.

The first step of the CPPTF was to provide education to its members on how the current separate transmission project planning processes worked. In fiscal year 2024, the CPPTF pivoted towards discussion of how a possible combined process would work, as well as determining how any costs for transmission projects would be split among consumers and generator owners. Discussion has focused on how a charge for generators would be set up. Work has continued into FY 2024, with the hope of a tariff filing possibly before the end of CY 2024.

### Holistic Integrated Task Team (HITT) - M1

In fiscal year 2024, SPP stakeholders continued their work on the Holistic Integrated Task Team improvement (HITT M1). HITT M1, one of the market initiatives, concerned potential changes to a financial hedging instrument allowing parties to hedge the differences in price from where a generator was located to where the energy generated was consumed. CAWG and the SPP RSC analyzed and took the lead on this issue, as the financial hedging instrument was under the SPP RSC's purview.

HITT M1 resulted in nine (9) subparts. Seven (7) of the M1's subparts were supported by all of the states, but two of the subparts were not. Subpart 5 was about how excess Transmission Congestion auction revenues would be distributed to parties holding hedge instruments, with some stakeholders expressing concern that hedges created further in the past were receiving significantly more money than more recently created hedges. Subpart 1 was about how and whether to reset existing hedges, with some parties proposing to reset all of the hedges every 10 years or whenever a generator was retired.

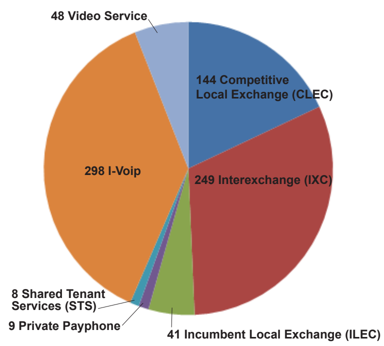
Discussions on these issues are ongoing. It is expected that at least M1 subpart one (1), and in all likelihood subpart two (2), would have further discussions in FY 2025.

## 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.

**Telecommunications, IVoIP, and Video Service Providers**



## Telephone Numbering

The PSC 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 PSC 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 PSC to examine and verify telephone numbering needs involving individualized company-specific situations. In the 2024 fiscal year, the PSC received two safety valve requests.

## 573 and 816 Area Code Relief

The 573 and 816 area codes were projected to run out of telephone numbers in the first quarter of 2024 and first quarter of 2025, respectively. Telephone number relief consists of overlaying a new area code in each area and require 10-digit local dialing. The 235 area code will be assigned in the 573 area while the 975 area code will be assigned in the 816 area. Telephone numbering relief efforts essentially were completed in March 2024 for the 573 area and November 2023 for the 816 area but numbers from the new area codes will not become available until the existing area code runs out of available telephone numbers.

| Area Code | Projected Date of Telephone Number Exhaustion* |
|---|---|
| 314/557 | *Exhaust date exceeds 30 years* |
| 417 | 2nd quarter of 2034 |
| 573/235 | Exhaust date exceeds 40 years |
| 636 | *Exhaust date exceeds 50 years* |
| 660 | *Exhaust date exceeds 40 years* |
| 816/975 | Exhaust date exceeds 40 years |

**Forecast as approved by the FCC in April 2024. The exhaust dates are reviewed twice a year by numbering authorities.*

## Universal Service Fund Programs

The Federal Communications Commission (FCC) administers the federal Universal Service Fund (USF). This federal fund is used for a variety of different programs; however, the FCC relies on state commissions to specifically help in the administration of the high-cost program and the Lifeline Program. A landline or wireless company operating in Missouri wanting to receive financial support from the federal high-cost program or the Lifeline program must first obtain status from the Commission as an eligible telecommunications carrier (ETC). ETC status ensures a company meets certain qualifications and makes certain commitments for complying with various program requirements. FCC rules identify minimum ETC requirements; however, a state commission may expand upon those requirements. This past year, two companies applied for ETC status ultimately raising the number of Missouri companies with ETC status to 95 companies.

## High-Cost Program

The high-cost program is solely funded through the federal universal service fund and is intended to ensure voice and broadband services are available to consumers throughout the nation at comparable rates. Essentially the high-cost support program provides financial support to companies serving high-cost areas in rural and sparsely-populated areas. In Missouri, 64 companies received approximately $140 million in federal high-cost support in 2023.

A significant portion of this funding is for broadband expansion. For example, $112 million of the $140 million in high-cost support was provided in 2023 to 60 companies to expand broadband service to 462,537 locations in rural Missouri. This funding typically obligates a company to expand broadband service to a designated number of locations within a limited time period. The FCC identifies the targeted areas and usually awards the funding through a competitive bidding process. A company's bid to bring broadband service to an area can use different last mile technologies such as fiber, fixed wireless or both. Funding is typically awarded for ten years. Winning bidders are subject to meeting certain deployment milestones in year 3, 4 and 5 and complete the project by the end of year 6. Companies failing to meet milestones are subject to financial consequences as determined by the FCC. As of the end of 2023, broadband service has been provided to 338,531 of the 462,537 targeted locations.

The FCC relies on state commissions to annually certify companies receiving high-cost support payments. This certification process is intended to ensure a carrier's high-cost support was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrade of facilities and services for which the support is intended. Failure to obtain this state certification results in termination of a company's high-cost support. Commission rules identify annual certification requirements but during the past year the Commission also established Case No. TO-2023-0436 to investigate concerns a specific company was misreporting and failing to meet broadband funding obligations. The case assisted the FCC in confirming the company has failed to fulfill broadband deployment obligations.

### Lifeline Program

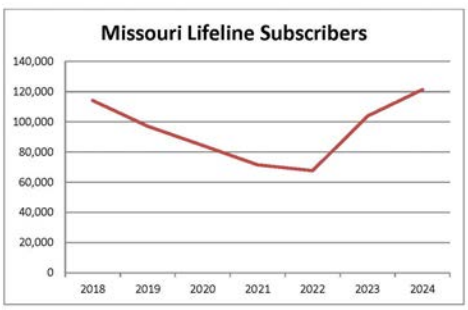
The Lifeline Program provides discounted phone service to qualifying low-income consumers. Landline and wireless companies participate in the Lifeline Program which has been in existence since 1985 and overseen by the FCC in partnership with the states. Funding for the Lifeline Program comes from the federal USF and the Missouri USF.

Federal funding for the Lifeline Program has gradually reduced support for voice-only service and may eliminate it by Dec. 1, 2025. Missouri USF support has increased to offset federal reductions so that a landline Lifeline subscriber receives a total discount of $24.00. Missouri USF Lifeline support is currently $18.75 for voice-only service and $14.75 for voice service combined with a qualifying broadband service. Per Missouri law, Missouri USF support is not offered to wireless providers or for broadband-only service.

Consumers participating in the following programs are eligible for the Lifeline Program: MO HealthNet, the Supplemental Nutrition Assistance Program (SNAP), Supplemental Security Income, federal public housing, and Veterans and Survivors Pension Benefit program

Consumers with a household annual income at or below 135 percent of the federal poverty level are eligible for the Lifeline Program.

As of June 2024, there were approximately 7.1 million Lifeline subscribers nationwide. Missouri has 121,402 Lifeline subscribers, which is an increase from the prior year of 103,959 Lifeline subscribers. Of these subscribers, approximately 2,391 receive Missouri USF support.




### Disabled Program

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

Approximately 248 subscribers were participating in the program in June 2024 versus approximately 260 subscribers a year earlier.

### Affordable Connectivity Program (ACP)

This federal program replaced the Emergency Broadband Benefit Program on Dec. 31, 2021. ACP provided a qualifying subscriber with a $30.00 monthly discount for broadband service and up to $100.00 for the purchase of computer and broadband-related equipment. ACP ended effective June 1, 2024, due to a lack of federal funding.

## FUNDS ADMINISTERED BY THE COMMISSION

### Missouri Universal Service Fund

The Missouri Universal Service Board, consisting of the PSC and OPC, oversees the Missouri USF pursuant to Section 392.248, RSMo.  Commissioner Maida Coleman currently serves as Chair of the Universal Service Board.

The Missouri USF currently provides funding to landline carriers for the provisioning of discounted voice service to qualifying Lifeline and disabled customers. The Missouri USF is funded through a percentage-based assessment on retail intrastate revenues of landline telecommunications companies and interconnected VoIP providers. Companies can recover this assessment directly from consumers by applying a monthly Missouri USF surcharge. Fund administration is awarded to an independent third party through a competitive bid process.

The Missouri USF fund balance has decreased from $522,465 to $428,020 during the July 2023 through June 2024 time period. The current assessment  rate is .0015. Revenue generated by this assessment is expected to enable the fund balance to remain at a reasonable level for several years.

## Relay Missouri Fund

The PSC 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 analog relay-related services and the Telephone Access Program. Missouri Assistive Technology administers the Telephone Access Program while the PSC oversees the provisioning of analog services used by hearing and speech-impaired consumers. The Relay Missouri Fund is funded by a per line monthly surcharge applied to each landline providing basic local telecommunications service or interconnected VoIP service. The Relay Missouri Fund balance increased from $1,284,778 to $1,520,562 during July 2023 through June 2024.

Usage of analog relay-related services has significantly declined over the years prompting the establishment of Case No. TO-2024-0033 to seek feedback about the future of the Relay Missouri Fund. In this case the PSC decreased the surcharge from $.10 to $.06 effective June 1, 2024, in order to reasonably bring the fund balance down to the desired target range within three years. At that time it's predicted the surcharge will need to be increased back to the $.10 surcharge in order to support the fund's expenses.

The Commission also decided to discontinue analog Captioned Telephone service (CapTel) service effective June 1, 2024, at the urging of the current CapTel service provider and the Relay Missouri Advisory Committee who cited the availability of acceptable alternative options. The case also provided feedback that any additional changes to the fund and/or analog relay service in Missouri will likely require state and federal legislation.

## Pricing Reforms

Effective Aug. 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 PSC or by maintaining rates on a company's website. Currently approximately 90 companies maintain their rates on their website.

## Other Wholesale Matters

State and federal laws provide the PSC with authority over wholesale telecommunications issues. Interconnection agreements are documents identifying the charges and how telecommunications providers interconnect with incumbent local telephone companies. During the past year a total of 19 new interconnection agreements were filed with the PSC and 3 interconnection agreements were revised.

# WATER, SEWER AND STEAM DEPARTMENT

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

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

There are approximately 21 regulated water and/or sewer companies and two regulated steam heat companies in the State of Missouri. Most of these companies are considered small or very small based upon those definitions as provided by the National Regulatory Research Institute (NRRI). Typically, these systems have less than 500 customers. One of the major challenges is providing the utility with reasonable revenue to make needed repairs and comply with Missouri Department of Natural Resources (DNR) mandated upgrades, while at the same time keeping rates reasonable for consumers.

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

## Small Rate Cases

In addition to Commission approval for a small rate case filed in fiscal year 2023, five small utility companies filed for small company rate increases in fiscal year 2024. A small utility serves fewer than 8,000 customers.

A rate case was filed by The Raytown Water Company (Case No. WR-2023-0344) on April 4, 2023, seeking to increase annual water revenues by approximately $735,100. On Jan. 18, 2024, the Commission approved an agreement authorizing Raytown Water Company a net increase in annual water revenues of $1,175,395.

# REGULATORY ACTIVITY

The following cases were filed in fiscal year 2024 but will be decided by the Commission in fiscal year 2025:
• United Services, Inc. filed a sewer rate case (Case No. SR-2024-0206) on Jan. 2, 2024, seeking to increase annual sewer revenues by $1.
• TBJ Sewer Systems, Inc. filed a sewer rate case (Case No. SR-2024-0306) on April 18, 2024, seeking to increase annual sewer revenues by $10,000.
• Holtgrewe Farms Water Company, LLC and Holtgrewe Farms Sewer Company, LLC filed water and sewer rate cases (Case No. WR-2024-0343 and Case No. SR-2024-0344, respectively) on May 24, 2024, seeking to increase annual water and sewer revenues by $10,000.
• Vicinity Energy Kansas City, Inc. filed a steam rate case (Case No. HR-2024-0370) on June 19, 2024, seeking approval of a new Severe Storm Recovery Mechanism and an increase of no more than $1 for non-fuel related expenses.

*Local Public Hearing in a large water and sewer rate case in St. Louis.*

## Large Rate Cases

In addition to Commission approval in fiscal year 2024 of a large rate case filed in fiscal year 2023, one utility company filed for a large company rate increase in fiscal year 2024. A large water or sewer utility is a utility that serves 8,000 or more customers.

On Dec. 21, 2022, Confluence Rivers Utility Operating Company, Inc. (Confluence) filed water and sewer rate cases with the Commission seeking to increase annual sewer operating revenues by approximately $1.9 million and annual water operating revenues by approximately $1.3 million (Case No. WR-2023-0006 consolidated with SR-2023-0007). On Oct. 25, 2023, the Commission approved an agreement authorizing Confluence a net increase in sewer operating revenues of approximately $860,000 and a net increase in water operating revenues of approximately $639,000.

On March 13, 2024, Liberty filed water and sewer rate cases with the Commission seeking to increase annual water revenues by approximately $8.0 million and annual sewer revenues by approximately $75,000 (Case No. WR-2024-0104 consolidated with SR-2024-0105). This case will be decided by the Commission in fiscal year 2025.

## Receivership Actions

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

In December 2022, Staff learned of an unauthorized utility operation in Pulaski County. On April 10, 2023, after a thorough investigation, staff filed a formal complaint against Mr. Travis Blevins, who was conducting business as a fictitious company named "Misty Water Works" (Case No. WC-2023-0353). Staff then petitioned Circuit Court of Cole County for the Appointment of a Receiver for Misty Water Works (Case No. WO-2024-0036) on Aug. 15, 2023. As of Aug. 19, 2024, the Commission has not made a ruling and the case remained open at the end of the fiscal year.

## Mergers and Acquisitions

Many mergers and acquisitions were filed with the Commission in fiscal year 2023 and approved by the Commission in fiscal year 2024, and a number of new mergers and acquisition cases were filed in fiscal year 2024.

On Oct. 18, 2023, the Commission approved a request filed by Confluence to acquire water and sewer assets from Lincoln County Water and Sewer, LLC (Case No. WA-2023-0398 consolidated with SA-2023-0396).

On Nov. 1, 2023, the Commission approved a request filed by Confluence to acquire the sewer system assets of the Village of Luray (Case No. WA-2023-0437).

On Nov. 8, 2023, the Commission approved a request filed by Missouri-American Water Company (MAWC) to acquire the assets of the water and sewer systems in the City of Ironton (Case No. WA-2023-0434 consolidated with SA-2023-0435).

On Dec. 13, 2023, the Commission approved a request filed by Confluence to acquire water and sewer assets from Brussels Valley Estates, Inc., Chevron/Sierra Land Company, LLC, and Mapaville Meadows (Case No. WA-2023-0450 consolidated with SA-2023-0451).

On Dec. 21, 2024, the Commission approved a request filed by Confluence to acquire the Country Life Acres sewer system (Case No. SA-2024-0129).

On Jan. 31, 2024, the Commission approved the merger of Confluence and North Oak Sewer District (Case No. SM-2024-0130). Under the merger, Confluence is the surviving entity.

On March 27, 2024, the Commission approved a request filed by Confluence to acquire water and sewer assets from the water and sewer systems of Lake Sherwood Estates Association (Case No. WA-2024-0048 consolidated with SA-2024-0049).

The following cases will be decided by the Commission in fiscal year 2025:
• On April 18, 2024, Confluence filed a request to acquire the sewer assets of Barbara E. Rampone located in and around the Timber Ridge subdivision (Case No. SA-2024-0307).
• On May 1, 2024, MAWC filed an application seeking to own, acquire, construct, operate, control, manage, and maintain the presently unregulated water system in and around the City of DeKalb (Case No. WA-2024-0325).

### Miscellaneous Actions

A finance case filed by Liberty (Case No. WF-2024-0135) was approved by the Commission on Feb. 29, 2024.

A finance case filed by Timber Creek Sewer Company was approved by the Commission on May 30, 2024.

A finance case was filed by MAWC (Case No. WF-2024-0353) on May 31, 2024, and the case will be decided by the Commission in fiscal year 2025.

## MANUFACTURED HOUSING AND MODULAR UNITS PROGRAM

The Manufactured Housing and Modular Units Program (Program) of the Commission oversees the annual registration of dealers and manufacturers of manufactured homes and modular units. It also manages the licensing of installers for new manufactured homes that comply with Federal Housing and Urban Development (HUD) standards. Additionally, Program Staff establish and enforce uniform construction, safety, and installation standards by conducting inspections. These inspections ensure compliance with tie-down and anchoring requirements.

The Commission provides a toll-free number, 1-800-819-3180, for consumers with questions or complaints about new manufactured homes or modular units. Program Staff provide free home inspections for first-time owners of homes that are less than two years old. For more information, visit the Commission's website at psc.mo.gov/manufacturedhousing.

In the 2024 fiscal year, Program Staff achieved the following:
• Conducted 546 routine site inspections, 346 re-inspection, and addressed 21 consumer complaints.
• Approved 480 modular plans from 104 different modular manufacturers.
Program Staff regularly conducts home inspections to identify and address installation issues before the home is completed. These inspections help prevent costly repairs and ensure that the home is properly installed, resulting in a longer-lasting structure. Often, these on-site inspections are requested by the home installer, dealer, or homeowner to confirm that the site is correctly prepared before the home is placed.


*Manufactured housing*

### Manufactured Homes & Modular Units

Modular and manufactured homes address a significant housing need in many rural areas where building traditional site-built homes can be challenging and time-consuming. Additionally, manufactured homes provide an affordable alternative to site-built homes.

Commercial modular units come in a range of sizes, from small single-section units to large structures with up to 170 units. They also include specialized applications such as medical facilities, banks, and jails. Many of these units can be delivered and become fully operational within a very short timeframe. Program Staff work closely with local building and code officials to ensure that these structures meet the relevant commercial building codes under the International Building Codes (IBC).

Modular unit classrooms are a key component of affordable educational facilities in many school districts across the state. They offer schools a cost-effective alternative to traditional site-built classrooms, enabling them to add classroom space at a fraction of the cost. Additionally, the rapid installation of modular classrooms provides a timely solution that can be seamlessly integrated into larger construction projects while other buildings are being erected.

### Recent Projects

The Program has overseen numerous manufactured housing communities across the state, with a significant number of homes being installed this year. Program inspectors prioritize visiting these communities both before and during the installation of homes to ensure compliance with codes. They also collaborate with Commission-licensed installers to deliver high-quality installations, ensuring that the homes will serve their buyers effectively for many years.

### KC Wheel Project in Kansas City

The Program approved several modular units plans to go into the KC Wheel Project, a one-of-a-kind view of the beloved KC skyline from the comfort of your own private gondola seating up to six people. Floor-to-ceiling windows offer a 360-degree view.

**Manufactured Housing and Modular Units Program**
Fiscal Year 2024 Statistics

| | |
|---|---|
| Registered Manufacturers | 164 |
| Registered Dealers | 236 |
| Registered Installers | 93 |
| Homes Sold (New & Used) | 3,821 |
| Consumer Complaints Received | 21 |
| On-Site Inspections | 546 |
| Re-inspections | 346 |
| Dealer Lot Inspections | 16 |
| Dealer Lot Investigations | 24 |
| Modular Unit Seals Issued | 2,308 |
| Modular Unit Plans Approved | 480 |
| Installer Decals Issued | 1,513 |

In March 2024, Program Manager David Freeman attended the HUD SAA & PIA Western and Midwestern Regional Meeting in New Mexico, where several issues related to manufactured housing were discussed. Throughout the year, Program Staff collaborated with MMHA (Missouri Manufactured Housing Association) to host multiple installer training sessions. They also worked with numerous homeowners to ensure that homes in Missouri are set up correctly and facilitated mediation between homeowners, dealers, installers and manufacturers.

### Manufactured Housing Program

The PSCs Manufactured Housing and Modular Units Program regulates and licenses manufacturers and dealers of new and used manufactured homes and modular units, as well as installers responsible for the initial setup of these homes. This ensures that these entities are authorized to conduct business legally in Missouri.

## CUSTOMER EXPERIENCE DEPARTMENT

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

CXD Staff consists of Research/Data Analysts and Senior Research/Data Analysts. CXD Staff participated in a diverse range of cases and projects during the 2024 fiscal year including small utility rate cases, formal complaints, general rate cases, certificate applications, investigatory dockets, tariffs, variances, rulemakings and working groups.

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

CXD Staff performed service quality analyses during the 2024 fiscal year on a number of small water and sewer companies in the context of rate increase requests, acquisitions and certificate cases. Audits of small water and sewer companies provide CXD Staff an opportunity to recommend improvements and examine compliance in areas including customer billing, payment remittance, credit and collections, complaint handling, business office operations and record retention.

During the 2024 fiscal year, CXD Staff filed testimony or a Staff Report in formal complaints, request for variance cases and a variety of other cases, including (however, not limited to):
• In the Matter of a Proposed Rulemaking to Promulgate a New Rule Regarding a Residential Customer Disconnection Data Reporting Rule (Case No. AX-2023-0175);
• The PSC Staff vs. Evergy Missouri Metro and Evergy Missouri West (Case No. EC-2024-0092);
• In the Matter of the Joint Application of Evergy Missouri Metro and Evergy Missouri West for Approval of Tariff Revisions to TOU Program (Case No. ET-2024-0061);
• In the Matter of the Application of Liberty for an Order Granting Billing Variances Related to the Company's Implementation of its Customer First Program (Case No. GE-2024-0046);
• In the Matter of the Application of Liberty for an Order Granting Billing Variances Related to the Company's Implementation of its Customer First Program (Case No. GE-2024-0201);
• In the Matter of the Application of Liberty/MO Water for an Order Granting Billing Variances Related to the Company's Implementation of Customer First (Case No. WE-2024-0202);
• In the Matter of the Application of Liberty/MO Water for an Order Granting Billing Variances Related to the Company's Implementation of Customer First (Case No. SE-2024-0203);
• In the Matter of the Application of Liberty for an Order Granting Billing Variances Related to the Company's Implementation of Customer First (Case No. EE-2024-0232);
• In the Matter of Confluence's Request for Authority to Implement a General Rate Increase for Water Service and Sewer Service Provided in Missouri Service Areas (Case No. WR-2023-0006); and
• In the Matter of the Application of a Rate Increase of Raytown Water Company (Case No. WR-2023-0344).

CXD Staff receives and reviews quality of service reports from various companies because of mergers, investigations and rate cases. These reports typically contain data on staffing levels, field operations, the number of billing estimates performed and call center indicators such as average speed of answer, abandoned call rate, calls handled by an interactive voice response system ("IVR") and the use of call back technology. CXD Staff monitors various aspects of customer experience including the call center performance of the state's large regulated natural gas, electric, water and sewer companies.

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

## CONSUMER SERVICES DEPARTMENT

The Consumer Services Department (Consumer Services):
• Responds to information requests, consumer complaints and inquiries regarding utility service. Consumer Services also handles the submission of public comments regarding pending cases before the Commission.
• 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 more than 4,800 customer-related contacts during the 2024 fiscal year. Those contacts included complaints, inquiries regarding rules and regulations, information requests, non-jurisdictional requests and public comments related to pending utility cases.

# REGULATORY ACTIVITY

## REGULATED UTILITIES 2023 CALENDAR YEAR STATISTICS

### ELECTRIC STATISTICS
Calendar Year 2023 (Missouri Jurisdictional)

| Company Name | Operating Revenues | MWhs Sold | Residential Customers | Total Customers |
|---|---|---|---|---|
| Liberty Utilities, Empire District Electric Co. | $ 570,928,299 | 4,157,205 | 138,557 | 163,917 |
| Evergy Missouri Metro (1) | 895,152,422 | 8,263,519 | 270,706 | 305,816 |
| Evergy Missouri West (2) | 881,102,373 | 8,460,486 | 296,521 | 343,879 |
| Ameren Missouri (3) | 3,017,111,397 | 30,302,136 | 1,087,971 | 1,254,162 |
| **Totals:** | **$5,364,294,491** | **51,183,346** | **1,793,755** | **2,067,774** |

*Source:* MoPSC FERC Form 1, 2023 Annual Reports (Missouri Jurisdictional)
(1) Formerly Kansas City Power & Light Company
(2) Formerly KCPL-Greater Missouri Operations Company
(3) Union Electric Company d/b/a

### NATURAL GAS STATISTICS
Calendar Year 2023 (Missouri Jurisdictional)

| Company Name | Operating Revenues | Mcfs Sold | Residential Customers | Total Customers |
|---|---|---|---|---|
| Liberty Utilities | $ 75,999,244 | 8,205,169 | 45,323 | 52,219 |
| Empire District Gas Co. | 62,400,861 | 7,818,024 | 37,558 | 43,112 |
| Spire Missouri East (1) | 889,495,511 | 75,080,702 | 624,064 | 665,078 |
| Spire Missouri West (2) | 846,221,479 | 73,277,397 | 503,926 | 538,371 |
| Summit Natural Gas Co. (3) | 48,693,873 | 3,393,820 | 15,770 | 19,373 |
| Ameren Missouri (4) | 157,029,196 | 18,112,479 | 122,289 | 136,259 |
| **Totals:** | **$2,079,840,164** | **185,887,591** | **1,348,930** | **1,454,412** |

*Source:* MoPSC FERC Form 2 2023 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

### STEAM STATISTICS
Calendar Year 2023 (Missouri Jurisdictional)

| Company Name | Operating Revenues | MMBtus Sold | Residential Customers | Total Customers |
|---|---|---|---|---|
| Evergy Missouri West (1) | $ 22,810,629 | 2,974,183 | 0 | 5 |
| Vicinity Energy Kansas City, Inc. (2) (3) | 20,829,874 | 1,762,652 | 0 | 47 |
| **Totals:** | **$43,640,503** | **4,736,835** | **0** | **52** |

*Source:* 2023 Annual Report
(1) Formerly KCPL-Greater Missouri Operations Company
(2) Reported in MLB's
(3) Formerly Veolia Energy Kansas City, Inc.

# REGULATED WATER & SEWER UTILITIES 2024 FISCAL YEAR STATISTICS

## COMBINATION WATER & SEWER COMPANIES*
Fiscal Year 2024

| Company Name | Water Customers | Sewer Customers |
|---|---|---|
| Confluence Rivers Utility Operating Company, Inc. | 4,895 | 5,155 |
| Lake Northwoods Utility Company, Inc. | 12 | 12 |
| Liberty Utilities, LLC | 12,475 | 5,358 |
| Lincoln County Sewer & Water, LLC | 261 | 262 |
| Missouri-American Water Company | 481,4391 | 23,025 |
| Seges Utility Company, LLC** | 43 | 43 |
| S. K. & M. Water and Sewer Company | 305 | 173 |
| **Totals:** | **499,382** | **34,028** |

*Active companies as of 06/30/2024
** 2021 numbers—that is the latest Annual Report on file

## STAND-ALONE WATER & SEWER COMPANIES*
Fiscal Year 2024

| Water Company | Customers | Sewer Company | Customers |
|---|---|---|---|
| Argyle Estates Water Supply | 53 | Cannon Home Association | 123 |
| Environmental Utilities, LLC | 22 | Holtgrewe Farms Sewer Company, LLC | 44 |
| Gascony Water Company, Inc. | 212 | Mid Mo Sanitation, LLC | 33 |
| Holtgrewe Farms Water Company, LLC | 44 | North Oak Sewer District, Inc. | 83 |
| Raytown Water Company | 6,542 | TBJ Sewer Systems, Inc. | 79 |
| Stockton Hills Water Company | 142 | Taneycomo Highlands, Inc. | 32 |
| Village Greens Water Company | 112 | Timber Creek Sewer Company | 2,426 |
| Whiteside Hidden Acres, LLC | 37 | Seven Springs Sewer & Water Company | 27 |
| | | United Services, Inc. | 347 |
| | | Warren County Sewer Company | 34 |
| **Totals:** | **7,164** | **Totals:** | **3,228** |

*Active companies as of 06/30/2024

# RATE CASES DECIDED 2024 FISCAL YEAR

## WATER AND SEWER

| Date of Order | Case No. | Company | Rate Request | PSC Decision |
|---|---|---|---|---|
| 10/25/23 | WR-2023-0006 | Confluence Rivers Utility Operating Company, Inc. | $1.3 million | $638,900 |
| 10/25/23 | SR-2023-0007 | Confluence Rivers Utility Operating Company, Inc. | $1.9 million | $860,400 |
| 01/18/24 | WR-2023-0344 | Raytown Water Company | $735,100 | $1,175,395 |

# FISCAL YEAR-IN-REVIEW

**2023**

**July 12** Commission grants request filed by Confluence to acquire all or substantially all of the water and sewer systems of Four Seasons North MPH, LLC (Four Seasons) located in Johnson County. The Commission also grants Confluence a CCN to own, install, operate, manage and maintain the water and sewer systems.

**July 12** Commission grants request filed by Confluence and Terry Jarrett, Receiver for the sewer system assets of Kenneth Jaeger, authorizing Confluence to purchase the sewer assets of a system located near the Lost Valley Subdivision in Ralls County near Monroe City. The Commission also grants Confluence a CCN to own, install, operate, manage and maintain the sewer system and provide service to the public.

**Aug. 23** Commission approves agreement in Spire's ACA case for the 2019-2020 ACA period. The 2019-2020 Spire ACA period contained the first costs incurred for service to Spire under its contract with its affiliate, Spire STL Pipeline.

**Aug. 23** Commission grants Spire a CCN to construct, own, operate and maintain a natural gas distribution system in Cass County near Raymore. The CCN is a further expansion of Spire's existing certificated area.

**Aug. 26** To continue preparing for a new area code (235) in the current 573 area code, a six-month permissive dialing period begins to give customers adequate time to adjust to 10-digit local dialing. The 235 area code will be added as an overlay to the 573 area code region.

**Aug. 30** Commission grants Spire Missouri a CCN to construct, own, operate and maintain a natural gas distribution system in Johnson County near Warrensburg, The CCN is a further expansion of Spire's existing certificated area.

**Sept. 11** Missouri Public Service Commission supports National Digital Connectivity and Lifeline Awareness Week.

**Sept. 14** Commission approves an agreement extending Liberty's Missouri Energy Efficiency Investment Act (MEEIA) Cycle 1 plan through Dec. 31, 2024.

**Sept. 14** Commission approves an electric territorial agreement between the Osage Valley Electric Cooperative Association and the City of Harrisonville. The agreement concerns a service area within Harrisonville and Cass County.

**Oct. 12** Commission modifies its 2010 order to allow larger commercial and industrial (C&I) customers of Commission-jurisdictional electric utilities with demands of 100 kilowatts or greater to transfer demand response load reductions to RTO markets directly or through third-party aggregator of retail customers (ARCs) under specific conditions as described in the Commission's order.

**Oct. 12** Commission approves a request filed by Grain Belt to amend its existing CCN that was granted by the Commission in case EA-2016-0358. The Commission authorized Grain Belt to: relocate the Missouri converter station from Ralls County To Monroe County; increase the capacity of the Missouri converter station from 500 MW to 2,500 MW; and relocate the AC connector line (the Tiger Connector) from Ralls County to Monroe, Audrain and Callaway counties. The Commission also authorized the project to be completed in two phases.

**Oct. 18** Commission grants request filed by Confluence to acquire all or substantially all of the water and sewer system assets of the currently unregulated systems of Lincoln County Water and Sewer, LLC (LCWS). The Commission also grants Confluence a CCN to operate the systems and provide service to the public.

**Oct. 25** Commission issues rate case decision authorizing Confluence to increase annual water operating revenues by approximately $638,900 and annual sewer operating revenues by approximately $860,400. When Confluence filed its rate cases on Dec. 21, 2022, it sought to increase annual water operating revenues by approximately $1.3 million and annual sewer operating revenues by approximately $1.9 million.

**Nov. 1** PSC Cold Weather Rule takes effect.

**Nov. 1** Commission grants Confluence a CCN to install, own, operate, control, manage and maintain a sewer system in Clark County, in and around the Village of Luray.

**Nov. 8** Commission grants Missouri-American Water Company (MAWC) request to acquire and operate the assets of a municipal water and sewer system in Ironton, Missouri, located in Iron County. MAWC was also granted a CCN to install, own, acquire, construct, operate, manage and maintain the water and sewer systems which are located in and around Ironton, Missouri.

**Nov. 16** Commission approves agreement further extending Evergy's MEEIA Cycle 3 to Dec. 31, 2024.

**Dec. 7** Commission grants Spire Missouri a CCN to construct, own, operate and maintain a natural gas distribution system providing natural gas service in Platte County, Mo. The CCN will be a further expansion of Spire's existing certificated area.

**Dec. 13** Commission grants Confluence authority to acquire and operate the sewer systems of Brussels Valley Estates, Inc. and Mapaville Meadows. In addition, Confluence has been granted authority to acquire and operate the water and sewer systems of Chevron/Sierra Land Company, LLC. The Commission has also granted CCNs to Confluence to operate these systems located in Lincoln, Morgan and Jefferson counties.

**Dec. 13** Commission approves addendum to an electric territorial agreement between Ameren Missouri and Consolidated Electric Cooperative, which was first approved by the Commission in August 1997. The addendum concerns two customers located wholly within the service territory of Ameren Missouri in Audrain County near Mexico.

**Dec. 21** Commission grants Spire Missouri a CCN to construct, own, operate and maintain a natural gas distribution system providing natural gas service in Cass County, Mo. The CCN will be a further expansion of Spire's existing certificated area.

**Dec. 21** Commission approves an application filed by Confluence seeking authority to acquire and operate the Country Life Acres sewer system. The Commission also granted a CCN to Confluence to operate the sewer system in Jefferson County.

## 2024

**Jan. 2** Commissioner Kayla Hahn appointed by Governor Michael Parson to a new six-year term.

**Jan. 18** Commission issues rate case decision authorizing The Raytown Water Company to increase annual water operating revenues by approximately $1.2 million.

**Jan. 31** Commission approves an application filed by Confluence seeking authority to acquire and operate the North Oak Sewer District, Inc. sewer system. The Commission also granted a CCN to Confluence to operate the sewer system in Warren County.

**Feb. 2** Evergy Missouri West files an electric rate case with the Commission seeking a net increase in its base rates of approximately $104.5 million.

**Feb. 6** Kayla Hahn was named Commission Chair.

**Feb. 9** Liberty files a rate case with the Commission seeking a net increase in annual natural gas revenues of approximately $11.2 million.

**Feb. 24** 10-digit local dialing begins in the 573 area code.

**Feb. 29** Commission approves an electric territorial agreement between Ameren Missouri and Tri-County Electric Cooperative, which designates the exclusive service territories of each provider within certain areas of Adair County, in and around Kirksville.

**March 13** Liberty/MO Water files water and sewer rate cases with the Commission. Liberty seeks to increase annual water revenues by approximately $7.99 million and annual sewer revenues by approximately $75,180.

**March 18** Missouri Public Service Commission supports national "Fix-a-Leak Week".

**March 21** Commission approves agreement that grants CCNs to Ameren Missouri to construct, install, own, manage and maintain: 1) a 300 megawatt solar generation facility to be constructed in Warren County (Split Rail Project); a 50 megawatt solar generation facility to be constructed in Audrain County (Vandalia Project); and a 50 megawatt solar generation facility to be constructed in Pike County (Bowling Green Project).

**March 21** Commission adopts PSC Staff recommendation to reduce the Relay Missouri surcharge from $0.10 per month, per telephone line to $0.06 per month, per telephone line. The surcharge funds the Relay Missouri Program in Missouri.

**March 21** Commission approves agreement that authorizes Evergy Missouri West to acquire a 22.2 percent interest in an existing natural gas-fired, combined cycle generation facility known as the Dogwood Energy Facility. Evergy Missouri West is also granted a CCN to own, operate, maintain and otherwise control and manage the Dogwood Energy Facility located in Cass County.

**March 28** Commission approves an application filed by Confluence seeking authority to acquire and operate the Lake Sherwood Estates Association water and sewer systems. The Commission also granted a CCN to Confluence to operate the water and sewer systems in Warren County.

**April 2** Missouri Public Service Commission recognizes April as National Safe Digging Month.

**April 10** Commission grants ATXI a CCN to construct, own, operate, maintain and otherwise control a new 345 kV switch yard and associated facilities in Knox County. The switchyard will be located on land already owned by ATXI.

**April 12** John P. Mitchell is appointed by Governor Michael Parson to the Public Service Commission. Mitchell was confirmed by the Missouri Senate on April 25, 2024.

**May 30** Commission approves an application filed by Spire Missouri, seeking authority to acquire and operate natural gas service in Cass County, Mo. The CCN will be a further expansion of Spire's existing certificated area to serve additional commercial buildings.

**June 1** Missouri Hot Weather Law takes effect.

**June 5** Commission approves unanimous Stipulation and Agreement reached by parties in a case filed by Liberty, which sought a CCN to acquire, operate and manage two combustion turbine generators. The generators will replace existing combustion turbine generators Riverton Unit 10 and Riverton Unit 11, located in Riverton, Cherokee County, Kan.

**June 20** Commission issues financing order authorizing Ameren Missouri to issue securitized utility tariff bonds for Energy Transition Costs and associated Financing Costs related to the early retirement of its Rush Island Energy Center.

# 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 | 9120-1923 |
| 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 |

| COMMISSIONER | LENGTH OF SERVICE |
|---|---|
| Frank J. Iuen | 1959-1963 |
| Frank W. May | 1961-1967 |
| Donal D. Guffey | 1963-1968 |
| William R. Clark | 1965-1975 |
| Charles J. Fain | 1965-1977 |
| Howard Elliot, Jr. | 1967-1970 |
| Marvin E. Jones | 1967-1973 |
| Willard D. Reine | 1968-1975 |
| James F. Mauze | 1971-1975 |
| A. Robert Pierce, Jr. | 1973-1977 |
| James P. Mulvaney | 1975-1977 |
| Stephen B. Jones | 1975-1979 |
| Hugh A. Sprague | 1975-1979 |
| Charles J. Fraas | 1977-1983 |
| Leah Brock McCartney | 1977-1983 |
| Alberta Slavin | 1977-1981 |
| Stephanie Bryant | 1979-1981 |
| Larry W. Dority | 1979-1983 |
| John C. Shapleigh | 1981-1984 |
| Charlotte Musgrave | 1981-1988 |
| Allan G. Mueller | 1983-1996 |
| Connie Hendren | 1983-1989 |
| James M. Fischer | 1984-1989 |
| William D. Steinmeier | 1984-1992 |
| David Rauch | 1989-1993 |
| Kenneth McClure | 1990-1997 |
| Ruby Letsch-Roderique | 1990-1991 |
| Patricia Perkins | 1991-1995 |
| Duncan Kincheloe | 1992-1997 |
| Harold Crumpton | 1993-2000 |
| M. Dianne Drainer | 1995-2001 |
| Karl Zobrist | 1996-1997 |
| Sheila Lumpe | 1997-2003 |
| Connie Murray | 1997-2009 |
| Robert Schemenauer | 1998-2001 |
| Kelvin Simmons | 2000-2003 |
| Bryan Forbis | 2001-2003 |
| Steve Gaw | 2001-2007 |
| Robert Clayton III | 2003-2011 |
| Linward "Lin" Appling | 2004-2008 |
| Jeff Davis | 2004-2012 |
| Terry Jarrett | 2007-2013 |
| Kevin Gunn | 2008-2013 |
| Robert S. Kenney | 2009-2015 |
| Stephen M. Stoll | 2012-2017 |
| Daniel Y. Hall | 2013-2019 |
| William P. Kenney | 2013-2021 |
| Ryan A. Silvey | 2018-2023 |
| Scott T. Rupp | 2014-2024 |
| **Maida J. Coleman** | **2015-present** |
| **Jason R. Holsman** | **2020-present** |
| **Glen Kolkmeyer** | **2021-present** |
| **Kayla Hahn** | **2023-present** |
| **John P. Mitchell** | **2024-present** |

**Missouri Public Service Commission**
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