## BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of an Earnings Investigation of the	)	
Retail Natural Gas Utility Operated by the Union	) Case No. GO-2016-03	<u>62</u>
Electric Company d/b/a Ameren Missouri	)	

## PROGRESS REPORT IN RESPONSE TO ORDER

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Progress Report in Response to Order* (the "Progress Report"), states as follows:

- 1. On July 12, 2016, the Commission issued its *Order Opening an Investigation* (the "Order") in this docket which ordered Staff to "undertake an investigation of the rates charged by Union Electric Company d/b/a Ameren Missouri for the provision of natural gas" and to "file a progress report regarding its investigation no later than September 12, 2016." This Progress Report is being submitted in response to the Order.
- 2. At this time, Staff is still analyzing information received from the company in response to data requests (DRs) submitted to the company; Staff would note that the company's most recent DR responses were received in EFIS after 11:00 pm on September 7. Staff anticipates that it will need to meet with company personnel for discussion and clarification of certain matters and may need to submit additional data requests subsequent to those meetings.
- 3. Based on the foregoing and the anticipated need for further discovery in this earnings investigation, Staff will file either a further Progress Report or the results of its earnings investigation in this docket no later than December 12, 2016, which date will

closely coincide with the scheduled filing date for Staff's Revenue Requirement Direct testimony/report in the company's pending electric rate case, Case No. ER-2016-0179.

**WHEREFORE** Staff submits this Progress Report in response to the Commission's July 12, 2016, *Order Opening an Investigation*.

Respectfully submitted,

## /s/ Jeffrey A. Keevil

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## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 12th day of September, 2016.

/s/ Jeffrey A. Keevil