BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of a Working Case to)	
Consider Policies to Improve)	File No. EW-2016-0313
Electric Utility Regulation.)	

Proposed Questions to Consumer Groups

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), and proposes the Commission issue an order directing the Consumer Groups¹ to provide answers to the following questions by filing them in this docket by September 23, 2016:

- 1. Please identify the persons, firms or entities the interests of which are being represented by Missouri Industrial Energy Consumers in this workshop.
- 2. Please identify the persons, firms or entities the interests of which are being represented by Midwest Energy Users Group in this workshop.
- 3. For each person, firm or entity identified in response to questions 1 and 2 above², please provide a narrative explanation of their needs and expectations regarding the reliability of their electric service. Please provide the number and duration of electric outages that would be acceptable to each such person, firm or entity each year.
- 4. What is the cost of an electric outage for each such person, firm, or entity? Please be as specific as possible, by explaining the cost of an electric outage depending on the time of day or occurrence or the outage's duration. If the cost of an electric outage cannot be quantified, please describe in detail the impact of an outage on operations, including a description of the differing impacts depending on the timing or duration of an outage.
- 5. For each such person, firm or entity, how do the electric rates that they pay in Missouri compare to the electric rates that they pay in each other state where they do business?
- 6. Which of such persons, firms or entities are currently looking to implement a renewable energy goal or mandate for their company? For each such person, what percentage of their energy would need to be renewable and by what dates?

¹ For purposes of this pleading, the "Consumer Groups" are defined as the Joint Movants on the *Joint Motion for Order Directing Filing and for Expedited Treatment* filed in this docket on August 26, 2016.

² All references to each such person, firm or entity are to the persons, firms or entities identified in response to questions 1 and 2.

- 7. Which of such persons, firms or entities are currently looking to implement a reduced or zero greenhouse gas emissions goal or mandate for their company? For each of them, what greenhouse gas emission limits are they working to achieve and by what dates?
- 8. For each such person, firm or entity, please state the specific changes to MO's public utility statutory and regulatory provisions applicable to electrical corporations that they would find attractive for greater control, convenience or choices?

WHEREFORE, Ameren Missouri proposes the Commission order the Consumer Groups to respond to these questions by filing answers to them in this docket no later than September 23, 2016, which is the same date the electric utilities are required to respond to certain Staff questions pursuant to the Commission's *Order Directing Utilities to Respond to Staff's Questions* issued and effective August 31, 2016.

Respectfully submitted,

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