BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri For an Order Authorizing the Issue and Sale of Up to \$450,000,000 Aggregate Principal Amount of Additional Long-Term Indebtedness.

Case No. EF-2019-

REQUEST FOR WAIVER OF 60-DAY REQUIREMENT

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), and for its *Request for Waiver of 60-Day Requirement* ("*Request for Waiver"*), states as follows:

1. 4 CSR 240-4.017(1) provides that any utility "...that intends to file a case shall file a notice with the secretary of the commission a minimum of sixty (60) days prior to filing such case."

2. Pursuant to 4 CSR 240-4.017(1)(D), waivers of the 60-day notice requirement may be granted for good cause shown. The rule further provides that good cause includes "a verified declaration from the filing party that it has had no communication with the office of the commission within the prior one hundred fifty (150) days regarding any substantive issue likely to be in the case..."¹

3. As indicated in the Affidavit attached as Exhibit A, Ameren Missouri has had no communications with the office of the Commission (as defined by 4 CSR 240-4.015(10)) regarding any substantive issue likely to be in this case during the preceding 150 days. Accordingly, Ameren Missouri has established good cause for a waiver from the 60-day requirement of 4 CSR 240-4.017(1).

¹ Pursuant to the Commission's *Order Waiving 60-Day Notice Requirement* issued on August 1, 2017, in File No. WM-2018-0023, this examples of good cause provided in the rule are not exclusive, and the Commission may find that good cause has been established by other circumstances.

WHEREFORE, Ameren Missouri respectfully submits its Request for Waiver of 60-Day

Requirement, and requests that the 60-day requirement for this notice be waived given these particular circumstances.

Respectfully submitted,

UNION ELECTRIC COMPANY, d/b/a Ameren Missouri

/s/ Paula N. Johnson

Paula N. Johnson, #68963 Senior Corporate Counsel 1901 Chouteau Avenue, MC 1310 St. Louis, MO 63103 (314) 554-3533 (phone) (314) 554-4014 (fax) <u>AmerenMOService@ameren.com</u>

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Request has been e-mailed, this 18th day of January, 2019, to the Missouri Public Service Commission Staff and to the Office of the Public Counsel.

<u>/s/ Paula N. Johnson</u> Paula N. Johnson

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Case No. EF-2019-

AFFIDAVIT OF DARRYL T. SAGEL

STATE OF MISSOURI)) ss CITY OF ST. LOUIS)

Darryl T. Sagel, being first duly sworn on his oath, states:

1. My name is Darryl T. Sagel. I work in the City of St. Louis, Missouri, and I am employed by Ameren Services Company as the Vice President and Treasurer.

2. Neither Union Electric Company d/b/a Ameren Missouri nor any person on its behalf has had any communications with the office of the Commission regarding any substantive issue likely to be an issue in the case initiated by this filing during the preceding 150 days.

3. I hereby swear and affirm that the information contained is true and correct.

Subscribed and sworn to before me this <u>2019</u> day of January, 2019.

1 A. Griftigh

My commission expires:

STEPHANIE A. GIFFORD Notary Public - Notary Seal State of Missouri Commissioned for St. Charles County My Commission Expires. January 30, 2020 Commission Number: 11479771