

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

In the Matter of Ameren Missouri’s Request)
for Variance from Certain Provisions of)
20 CSR 4240-20.065 Regarding Net Metering)
Applications.)

File No. EA-2020-_____

**REQUEST FOR VARIANCE
FROM CERTAIN PROVISIONS OF 20 CSR 4240-20.065**

COMES NOW, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or "the Company"), and for its *Request for Variance from Certain Provisions 20 CSR 4240-20.065 (Request for Variance)*, states as follows:

1. Section 9(A) of 20 CSR 4240-20.065 provides that each customer-generator and electric utility must enter into the interconnection agreement included in the regulation, but allows for an electric utility to allow customers to apply electronically through its website using an interconnection application/agreement that is substantially the same as the interconnection application/agreement included in the regulation.

2. In order to obtain information regarding whether an energy storage battery will be included in the potential customer-generator's interconnected facilities, the Company wishes to add a few short questions regarding energy storage batteries to the interconnection application/agreement available on its website. Specifically, the Company desires to add the following to the application/agreement:

Is there a battery backup?

 

Battery Manufacturer

Battery Model

Battery Information (Please provide additional info if 'Y' is selected for battery backup)

3. This additional information yields at least two benefits. First, the information regarding battery facilities to be added behind a customer's meter will allow confirmation that energy reproduced by a battery will not back-feed onto the Company's distribution networks triggering safety concerns for personnel working on the Company's distribution networks. Second, from an administrative perspective, the battery detail will assist in review of applications/agreements' plans. If the submitted plan does not include a battery, but the

application indicates a battery facility will be incorporated by the customer-generator, the Company can request an accurate (corrected) plan be submitted.

4. Granting this variance, and allowing limited battery detail to be obtained by the Company, will not overly burden customer-generators applying for interconnection and will increase efficiency of the interconnection approval process. Indeed, the technical plans to be submitted to the Company by customer-generators per 20 CSR 4240-20.065(9)(C) must contain the customer-generator's electrical generating system wiring diagram and specifications. To the extent that a customer indicates the connection of a battery on the electrical diagram, but does not include details about the battery, the Company must request that information in order to assess whether the interconnection application may be approved. Creating an opportunity for the customer-generator to provide the information up-front will reduce unnecessary delay in approving said application.

WHEREFORE, Ameren Missouri requests the Missouri Public Service Commission approve the request for variance of certain portions of 20 CSR 4240-020.065, as described above.

Respectfully submitted,

UNION ELECTRIC COMPANY, d/b/a
Ameren Missouri

/s/ Jermaine Grubbs

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 3rd day of January, 2020, to Staff General Counsel and the Office of the Public Counsel.

/s/ Jermaine Grubbs _____
Jermaine Grubbs