

ATTACHMENT 2

Variance Regarding Interval Versus Meter Register Data¹

Variance Requested ^{i, ii}		Rationale ⁱⁱⁱ	Justification ^{iv}
Beginning and Ending Meter Readings	20 CSR 4240-13.020(9) – Every bill for residential utility service shall clearly state – (A) The beginning and ending meter readings of the billing period and the dates of those readings...	As described in the <i>Stipulation</i> , granting a variance from these requirements so that the Company can execute interval billing will create process efficiencies and cost savings, as well as easier implementation of TOU rates.	As described in Paragraph 5 <i>Stipulation</i> , the Parties agree that an alternate method of tracking and analyzing interval data versus meter register data will assist in providing insights into relevant usage data.

i - 20 CSR 4240-2.060(4)(A) – The regulation from which the Company requests a waiver and/or variance.

ii – 20 CSR 4240-2.060(4)(C) – Ameren Missouri is the only public utility affected by this variance request.

iii - 20 CSR 4240-2.060(4)(B) – The reason the waiver and/or variance is requested.

iv - 20 CSR 4240-2.060(4)(B) – The justification for the waiver/and or variance, e.g., why no one will be harmed, and may even benefit, from the proposed waiver.

¹ See *Application for Variances* at page 11, Table 3.