

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

In the Matter of Ameren Missouri's Demand-Side     )  
Program Annual Report for 2019.                             )     File No. EO-2020-

**REQUEST FOR WAIVER AND  
AMEREN MISSOURI'S DEMAND-SIDE  
PROGRAM ANNUAL REPORT FOR 2019**

**COMES NOW** Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), and pursuant to 20 CSR 4240-4.017, requests a waiver from the 60-day notice requirement, and pursuant to 20 CSR 4240-20.094(9), files its Demand-Side Program Annual Report for 2019.

1. Ameren Missouri requests a variance from the 60-day notice requirement of 20 CSR 4240-4.017, which states, in relevant part:

Any person 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.

Pursuant to 20 CSR 4240-4.017(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..."<sup>1</sup> As indicated in the Affidavit attached as Schedule 1 to this *Application*, respectively, neither the Company has not had any communications with the office of the Commission (as defined by 20 CSR 4240-4.015(10)) regarding any substantive issue likely to be in this case during the preceding 150 days.<sup>2</sup> Accordingly, Ameren Missouri has established good cause for a waiver from the 60-

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<sup>1</sup> Pursuant to the Commission's *Order Waiving 60-Day Notice Requirement* issued on August 1, 2017, in File No. WM-2018-0023, the 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.

<sup>2</sup> Schedule 1 is incorporated by reference into this pleadings and made a part hereof for all purposes.

day requirement of 20 CSR 4240-4.017(1). No other public utility will be affected by granting the Company a waiver from this requirement.

2. The Missouri Public Service Commission's ("Commission") regulations implementing the Missouri Energy Efficiency Investment Act ("MEEIA") require utilities with one or more approved demand-side programs to file a Demand-Side Program Annual Report no later than 90 days after the end of each program year.<sup>3</sup>

3. Schedule 2 to this pleading is Ameren Missouri's Demand-Side Program Annual Report for its 2019 MEEIA programs (an Excel Workbook having multiple tabs). Tab 1 of Schedule 2 is an index which sets forth the requirements of 20 CSR 4240-20.093(9) and indicates where the information responsive to each specific requirement can be found. An Affidavit attesting to the veracity of the information contained in this Report is included as Schedule 1.

4. As required by the Commission's regulations, the Company is serving a copy of this report on each party to its last MEEIA case, File No. EO-2018-0211.

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<sup>3</sup> 20 CSR 4240-20.094(9)

**WHEREFORE**, Ameren Missouri requests that the Commission accept its Demand-Side Program Annual Report for its 2019 MEEIA programs.

Respectfully Submitted,

/s/ Paula N. Johnson

**Paula N. Johnson**, MO. Bar #68963

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**ATTORNEY FOR UNION  
ELECTRIC COMPANY d/b/a  
AMEREN MISSOURI**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission, facsimile or email to all counsel of record on this 30th day of March, 2020, to all parties in File No. EO-2018-0211.

/s/ Paula N. Johnson  
Paula N. Johnson

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## AFFIDAVIT OF WILLIAM R. DAVIS

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

William R. Davis, being first duly sworn on his oath, states:

1. My name is William R. Davis. I work in the City of St. Louis, Missouri, and I am employed by Union Electric Company d/b/a Ameren Missouri as Director Energy Efficiency & Renewables.

2. Neither 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. Further, under the penalty of perjury, I declare that the information contained in the foregoing and in the attached Annual Report is true and correct to the best of my knowledge and belief.

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William R. Davis

Subscribed and sworn to on this 26<sup>th</sup> day of March, 2020.