

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

In the Matter of Union Electric Company d/b/a Ameren)
Missouri's Purchased Gas Adjustment Tariff Filing) **Case No. GE-2020-0049**

**STAFF RECOMMENDATION REGARDING AMEREN MISSOURI'S REQUEST FOR
VARIANCE FROM COMMISSION RULE 4 CSR 240-2.090(2)(C) AND
APPLICABLE TARIFF PROVISIONS**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Staff Response to Ameren Missouri's Request For Variance From 4 CSR 240-2.090(2)(C) and Applicable Tariff Provisions* ("Request"), states as follows:

1. On August 28, 2019, Ameren Missouri filed its Request. On September, 3, 2019, the Commission issued its *Order Directing Filing* ("Order") ordering Staff to file its recommendation, or other pleading, no later than September 13, 2019.

2. Ameren Missouri's Request seeks a variance from Commission Rule 4 CSR 240-2.090(2)(C)¹, and its applicable tariff provision in Sheet No. 29.1. Rider A, Purchased Gas Adjustment Clause, Section 10(a), which require the Company to respond to data requests within 20 days of their issuance.

3. The Company states it made its Request in anticipation of Staff's planned September issuance of data requests regarding the Company's annual Actual Cost Adjustment reconciliation filing.

4. In support of its Request, the Company cites internal resource constraints due to addition of new staff, the need for training, and the retirement of a key staff person. Ameren Missouri states it intends to prioritize its responses and to provide its responses as soon as they become available, but no later than January 10, 2020.

¹ Rule is now re-numerated as 20 CSR 4240-2.090(2)(C).

5. Staff has reviewed Ameren Missouri's Request and is of the opinion the Request and plan for responding to Staff's data requests is reasonable. Accordingly, Staff does not object to the Commission granting Ameren Missouri's Request.

WHEREFORE, Staff prays the Commission accept its response to the Commission's Order.

Respectfully submitted,

/s/ Robert S. Berlin

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 4th day of September, 2019.

/s/ Robert S. Berlin