

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

In the Matter of the Request of Union	)	
Electric Company, d/b/a Ameren Missouri,	)	
For an Order Granting a Variance from	)	File No. EE-2018-0238
4 CSR 240-13.020(7) Regarding Payment	)	
Posting Requirements.	)	

**RESPONSE OF AMEREN MISSOURI**

**COMES NOW** Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and provides this pleading in response to the Missouri Public Service Commission's (“Commission”) *Order Directing Parties to File a Response* issued June 20, 2018. In support of its response, Ameren Missouri states as follows:

1. On March 5, 2018, and in an effort to resolve issues raised in File No. EC-2018-0113 (the “Complaint”), Ameren Missouri submitted its *Request for Variance* from 4 CSR 240-13.020(7), allowing the Company to post certain payments to customer accounts within 24 hours of receipt rather than the same calendar day.

2. On March 19, 2018, the Office of Public Counsel ("OPC") submitted the *OPC Response* noting that 4 CSR 240-13.020(7) is silent regarding posting, and that Ameren Missouri does not need relief from the rule.

3. On March 23, 2018, the Commission's Staff ("Staff") submitted the *Staff Recommendation* which noted that Ameren Missouri's recently increased documentation of payment received dates can be used to demonstrate when customer payments are remitted. Staff further stated that recording the payment remittance date negates the need for a variance.

4. On April 18, 2018, a *Notice of Abeyance and Order Directing Filing* was issued pending the resolution of a related Complaint case. On May 23, 2018, the Complainant dismissed

his case on the record as part of a prehearing conference, and subsequently affirmed his intent to dismiss on May 25, 2018. Accordingly, on May 29, 2018, the Commission issued its *Notice of Dismissal*, closing the Complaint.

5. Ameren Missouri had requested the variance, in an abundance of caution, based on the *Staff Memorandum* previously submitted in the now-dismissed Complaint case. As a result, in the instant case, if Staff and OPC are satisfied that no variance is required based on measures employed since the Complaint was first raised, Ameren Missouri is happy to withdraw its *Request for Variance*.

**WHEREFORE**, for the reasons stated above, Ameren Missouri respectfully requests that the Commission take the Company's response under consideration.

Respectfully submitted,

/s/ Paula N. Johnson

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ATTORNEYS FOR UNION ELECTRIC  
COMPANY d/b/a AMEREN MISSOURI

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing Response have been transmitted electronically to all counsel of record this 25<sup>th</sup> day of June, 2018.

**/s/ Paula N. Johnson**