

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

In the Matter of the First Prudence Review)
of the Missouri Energy Efficiency)
Investment Act (MEEIA) Cycle 3 Energy) File No. EO-2021-0157
Efficiency Programs and Cycle 2 Long-Lead)
Projects of Union Electric Company d/b/a)
Ameren Missouri.)

REQUEST FOR HEARING

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “the Company”) submits to the Missouri Public Service Commission (“Commission”) this *Request for Hearing*. In support of its request, Ameren Missouri states as follows:

1. On December 3, 2020, the Commission's Staff issued a pleading titled *Staff's Notice of Start of First MEEIA¹ Prudence Review of Cycle 3 Energy Efficiency Programs and Cycle 2 Long-Lead Projects* (“*Notice*”). 20 CSR 4240-20.093(11)(B) requires Staff to submit a recommendation regarding its prudence review not later than 150 days after the initiation of the prudence audit. Accordingly, on May 3, 2021, Staff submitted a report titled *Staff Report of First MEEIA Prudence Review of Cycle 3 of Costs Related to the Demand-Side Programs Investment Mechanism and Cycle 2 Long-Lead Projects for the Electric Operations of Union Electric Company d/b/a Ameren Missouri* (“*Report*”). The *Report* recommended a total disallowance of \$307,464.10 based on the recommendation to disallow an expense.

2. 20 CSR 4240-20.091(11)(B) also provides that a party may request a hearing in this proceeding within 10 days of Staff's recommendation. Barring such a hearing request, the Commission will issue an order not later than 210 days after the prudence audit is commenced. Ameren Missouri believes the adjustment resulting in the disallowance warrants further

¹ Missouri Energy Efficiency Investment Act.

discussion with Staff before an order in this matter is issued. Pursuant to 20 CSR 4240-20.093(11)(B), Ameren Missouri requests a hearing to fully and appropriately address the Staff recommendation and its impact. Although it hopes to fully resolve the matter before hearing is necessary, the Company asks the Commission to establish a conference within 60 days for the purpose of discussing settlement and/or a procedural schedule culminating in a hearing.

WHEREFORE, Ameren Missouri respectfully requests a hearing regarding Staff's *Report* and, to facilitate the development of a schedule to culminate in that hearing, further requests the Commission establish a scheduling conference within the next 60 days for the purpose of discussing such a schedule..

Respectfully submitted,

/s/ Paula N. Johnson

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**ATTORNEYS FOR UNION ELECTRIC
COMPANY D/B/A AMEREN MISSOURI**

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 10th day of May, 2021, to counsel for all parties on the Commission's service list in this case.

/s/ Paula N. Johnson