

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

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri)
for an Order Granting a Variance from 4)
CSR 240-10.030(19) to Revise its Sample)
Meter Testing Plan)

Case No. GE-2017-0164

OPC RESPONSE TO STAFF RECOMMENDATION

COMES NOW the Office of the Public Counsel (“OPC”) and for its response to the Staff Recommendation, states as follows:

1. On December 1, 2016, Union Electric Company d/b/a Ameren Missouri (“Ameren”) filed an application and request for variance from 4 CSR 240-10.030(19). The rule requires Ameren to remove, inspect, and test each gas service meter once every ten (10) years, or as often as warranted to ensure compliance with the Commission’s meter accuracy requirements in 4 CSR 240-10.030(18).

2. In 1997, the Commission approved a Sample Meter Testing Plan for Ameren whereby the company now samples meters by “lot.” The Commission also allowed Ameren to include language stating, “For each lot, the maximum permissible sampling period will be limited to thirty (30) years.”

3. The Staff filed its recommendation on March 22, 2017 and stated in part, “Staff has a safety related concern regarding deletion of the 30-year maximum testing interval without any compensatory action.” Ameren’s application is silent on the reasons for this deletion. The Staff’s proposed solution to resolve its concern is to send notices offering to perform a courtesy safety inspection for customers with meters that have not been tested in the previous 30 years.

4. OPC questions whether the the Staff's safety concerns will be properly addressed by placing the responsibility on the customer to have the company-owned meter inspected for safety issues. Even if a customer does request a safety inspection, such inspection will be limited to a visual inspection and a gas leak check. Such inspection will also not test the meter for accuracy as contemplated by 4 CSR 240-10.030(18) and 4 CSR 240-10.030(19).

5. OPC does not at this time oppose the application or request for a variance, but would like to have an additional opportunity to discuss this issue with Ameren and the Commission's Staff. For this reason, OPC asks the Commission to give OPC until April 14, 2017 to state whether OPC objects to the application and proposed variance.

WHEREFORE, the Office of the Public Counsel respectfully offers this response to the Staff's Recommendation and requests until April 14, 2017 to state whether OPC objects to the application and proposed variance.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 29th day of March 2017.

/s/ Marc Poston
