

**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	)	<b><u>Case No. GE-2017-0164</u></b>
Granting a Variance from 4 CSR 240-10.030(19) to	)	Tariff No. YG-2017-0241
Revise its Sample Meter Testing Plan	)	

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission and files its recommendation in this case concerning Union Electric Company d/b/a Ameren Missouri's ("Ameren Missouri" or "Company") compliance tariff filing as set forth in the accompanying Staff Recommendation Memorandum (which is incorporated herein by reference), and further states as follows:

1. On May 18, 2017, Ameren Missouri filed two tariff sheets intended to comply with the Commission's order of April 13, 2017, in which the Commission granted Ameren Missouri's request for modifications to its existing variance from the Commission's rule governing gas meter testing, which was granted in Case No. GO-98-25. Those tariff sheets bear a June 17, 2017, effective date.
2. On May 18, 2017, the Commission issued an Order Directing Staff to File a Recommendation regarding the tariff sheets no later than June 2, 2017.
3. The Commission's April 13, 2017, Order Granting Variance contained certain conditions, one of which<sup>1</sup> required Ameren Missouri to revise its tariff "to add 'as amended by **File** No. GE-2017-0164' directly following Case No. GO-98-25 as stated in its approved tariff sheet." (emphasis added)

---

<sup>1</sup> Ordered Paragraph 1.D.

4. As discussed in the accompanying Staff Recommendation Memorandum (which is incorporated herein by reference), the tariff sheets filed by Ameren Missouri add “**and** amended by **Case** No. GE-2017-0164” rather than “**as** amended by **File** No. GE-2017-0164.” (emphasis added) When read in the context of the tariff sheets these two phrases have the same meaning, and Ameren Missouri’s proposed tariff sheets fulfill the purpose of Ordered Paragraph 1.D., although not technically containing the exact language ordered by the Commission’s April 13, 2017, Order Granting Variance.

5. Staff has verified that Ameren has filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects, or is affected by, this filing.

**WHEREFORE**, Staff recommends that the Commission approve the following tariff sheets, or, in the alternative, allow these tariff sheets to go into effect by operation of law:

P.S.C. MO. No. 2

---

4<sup>th</sup> Revised SHEET No. 54 Cancelling 3<sup>rd</sup> Revised SHEET No. 54  
3<sup>rd</sup> Revised SHEET No. 55 Cancelling 2<sup>nd</sup> Revised SHEET No. 55

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

Jeffrey A. Keevil

Missouri Bar No. 33825

P. O. Box 360

Jefferson City, MO 65102

(573) 526-4887 (Telephone)

(573) 751-9285 (Fax)

Email: [jeff.keevil@psc.mo.gov](mailto:jeff.keevil@psc.mo.gov)

Attorney for the Staff of the  
Missouri Public Service Commission

**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 2<sup>nd</sup> day of June, 2017.

**/s/ Jeffrey A. Keevil**

## MEMORANDUM

TO: Missouri Public Service Commission Official Case File  
Case No. GE-2017-0164, File No. YG-2017-0241  
Union Electric Company d/b/a Ameren Missouri

FROM: Kim Cox, Tariff/Rate Design Unit, Operational Analysis Department

<u>/s/ Robin Kliethermes June 2, 2017</u> Tariff/Rate Design Unit/Date	<u>/s/ Jeff Keevil June 2, 2017</u> Staff Counsel's Office/Date
---	--

SUBJECT: Staff Recommendation for Approval of Union Electric Company d/b/a Ameren Missouri Compliance Tariff Filing

DATE: June 2, 2017

On December 1, 2016, Union Electric Company d/b/a Ameren Missouri (“Ameren”) filed an Application and Request for Variance with the Missouri Public Service Commission (“Commission”). On April 13, 2017, the Commission issued an Order Granting Variance (“Order”). On May 18, 2017, Ameren filed two tariff sheets bearing an effective date of June 17, 2017, intended to comply with the Order. On May 18, 2017, the Commission issued an Order Directing Staff to File a Recommendation regarding the tariff sheets no later than June 2, 2017.

The Order Granting Variance was subject to conditions. Condition D states: “Ameren Missouri shall revise P.S.C. MO. No. 2 3<sup>rd</sup> Revised Sheet No. 54 V11, F. Meter Testing to add “as amended by File No. GE-2017-0164” directly following Case No. GO-98-25 as stated in its approved tariff sheet.” Ameren’s proposed tariff sheet 4<sup>th</sup> Revised Sheet No. 54 uses the word “and” instead of “as” and uses the word “Case” instead of “File.”

The Commission’s Tariffs/Rate Design Staff has reviewed the tariff sheets and believes that in the context in which they are used in the tariff sheets using “and” instead of “as” and “Case” instead of “File” does not change the meaning and fulfills the purpose of Condition D. Therefore, Staff recommends that the Commission approve the following tariff sheets, or, in the alternative, allow these tariff sheets to go into effect by operation of law:

P.S.C. MO. No. 2

4<sup>th</sup> Revised SHEET No. 54 Cancelling 3<sup>rd</sup> Revised SHEET No. 54  
3<sup>rd</sup> Revised SHEET No. 55 Cancelling 2<sup>nd</sup> Revised SHEET No. 55

Staff has verified that Ameren has filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects, or is affected by, this filing.

