

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

In the Matter of Ameren Missouri's Request)	
for a Variance from Certain Provisions)	
of 4 CSR 240 Chapter 22 Regarding)	File No. EO-2017-
Electric Utility Resource Planning.)	

**REQUEST FOR VARIANCE PURSUANT TO
CERTAIN PROVISIONS OF 4 CSR 240 CHAPTER 22**

COMES NOW, Union Electric Company, d/b/a Ameren Missouri (Ameren Missouri or Company), and for its *Request for Variance from Certain Provisions of 4 CSR 240 Chapter 22 (Request)*, states as follows:

1. Pursuant to the Missouri Public Service Commission's (Commission) Electric Utility Resource Planning rules found in 4 CSR Chapter 22, electric utilities are required to triennially submit Integrated Resource Plans (IRPs) incorporating, generally, minimum standards and in a consistent format. Ameren Missouri is required to file its next triennial compliance filing on October 1, 2017.¹ When a request is made in writing at least 12 months prior to the compliance filing date, notice is provided, and there is an opportunity for hearing, 4 CSR 240-22.080(13) allows for the waiver or variance from certain rules within 4 CSR Chapter 22. For the reasons explained below, Ameren Missouri requests the Commission grant the Company variances from certain provisions of 4 CSR 240 Chapter 22, allowing it incorporate certain clarifications and alternatives.

2. Ameren Missouri requests a variance from or clarification of several provisions within 4 CSR 24 Chapter 22 for a variety of reasons. Please see Attachment A to this pleading for a complete description of the variances requested and the rationale for each. In summary, the requested variances, and the location in Attachment A where they are discussed, are:

¹ See Order Granting Variance issued July 22, 2015, in File No. EE-2015-0316.

Rule	Section/Attachment A Discussion
4 CSR 240-22.020 Definitions	4 CSR-240-020(12) Attachment A, p. 2
4 CSR 240-22.040 Supply Side Resources Analysis	4 CSR 240-22.040(3)(A) Attachment A, p. 2
4 CSR 240-22.045 Transmission and Distribution Analysis	4 CSR 240-22.045(1)(B) Attachment A, p. 4
	4 CSR 240-22.045(3)(C) Attachment A, p. 5
4 CSR 240-22.050 Demand-side Resource Analysis	4 CSR 240-22.050(4)(D)2 Attachment A, p. 5
	4 CSR 240-22.050(5)(B)3 Attachment A, p. 6
	4 CSR 240-22.050(5)(E) Attachment A, p. 6
4 CSR 22.060 Integrated Resource Plan and Risk Analysis	4 CSR 240-22.060(5)(E) Attachment A, p. 7
	4 CSR 240-22.060(5)(F) Attachment A, p. 7
	4 CSR 240-22.060(5)(K) Attachment A, p. 8
	4 CSR 240-22.060(5)(L) Attachment A, p. 8
	4 CSR 240-22.060(7) Attachment A, p. 9
4 CSR 240-22.080 Filing Schedule, Filing Requirements and Stakeholder Process	4 CSR 240-22.080(2)(C)2 Attachment A, p. 10
	4 CSR 240-22.080(5)(A) Attachment A, p. 10

3. Ameren Missouri is not requesting a variance from 4 CSR 240-22.050(4)(D)3, which addresses the assessment of interactions between potential demand-side rates and demand-side programs. However, the Company feels it will be helpful to clarify in this Request how Ameren Missouri plans to comply with this rule. The Company will work with stakeholders to identify key measures that could potentially result in cost savings if such measures were delivered for both energy efficiency and demand response. These measures will be screened with and without multiple purposes (e.g. learning thermostats). In addition, Ameren Missouri will present total potential for Maximum Achievable Potential and Realistic Achievable Potential, whereby demand-side rates, energy efficiency, and demand response programs are implemented concurrently. The presentation of the total potential will include an estimation of cost savings from concurrent delivery and expected interactive effects on energy and demand savings. For example, there may be cost savings in using a smart thermostat for energy efficiency and demand response, but some of the demand response savings could be reduced because of the energy efficiency savings already achieved. Furthermore, when smart thermostats are coupled with a demand-side rate option like time-of-use, the energy efficiency and demand response savings could be reduced because of the demand-side rate option savings.

WHEREFORE, Ameren Missouri asks the Missouri Public Service Commission to grant the variances requested to allow for a more clarified, effective, and relevant triennial compliance filing.

Respectfully submitted,

/s/ *Paula N. Johnson*

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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 30th day of September, 2016, to all parties in the Company's previous Triennial Compliance Filing docket, File No. EO-2015-0084.

/s/ *Paula N. Johnson*