BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Tariff Filings of Union Electric Company d/b/a Ameren Missouri, to Increase Its Revenues for Retail Electric Service.

File No. ER-2022-0337

MOTION FOR EXPEDITED TREATMENT AND APPROVAL OF ADDITIONAL TARIFF SHEETS FILED IN COMPLIANCE WITH COMMISSION ORDER ON LESS THAN THIRTY DAYS' NOTICE

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), and pursuant to the Commission's *Report and Order* issued June 14, 2023, in the above-captioned case (the "*R&O*"), and 20 CSR 4240-2.080(14), hereby files its *Motion for Expedited Treatment and Approval of Additional Tariff Sheets Filed in Compliance with Commission Order on Less Than Thirty Days' Notice*. In support of its *Motion*, Ameren Missouri states as follows:

1. As discussed in the Company's *Response to Order Directing Additional Information* also filed today, the Company indicated that it is filing four additional tariff sheets that were not part of the compliance tariff sheets filed on June 19, 2023. Those additional tariff sheets arise from the Company's collaboration with the Staff to arrive at all tariff changes necessary to address the Commission's decisions regarding the new default Smart Savers rate.

2. Section 393.140(11), RSMo., specifies that, unless the Commission orders otherwise, a change shall not be made to any rate filed by an electrical corporation except after thirty days' notice to the Commission and publication for thirty days as required by order of the Commission. However, Section 393.140(11) expressly provides that, for good cause shown, the Commission may allow tariff changes without requiring thirty days' notice. For the reasons given in its June 19, 2023, motion, good cause also exists to make the four additional tariff sheets filed today effective on July 1, 2023, when all other compliance tariffs would also take effect.

3. Therefore, as provided for in 20 CSR 4240-2.080(14), the Company requests that the Commission approve the additional four tariff sheets along with all of the other compliance tariff sheets to take effect on July 1, 2023. As noted in its June 19, 2023, motion, the Commission has good cause to do so. Furthermore, the Company states that by doing so, the Commission will avoid the harm that would be caused by failing to timely allow rates determined to have been just and reasonable to take effect as soon as possible. Moreover, there can be no negative effect on anyone – ratepayers or the Company – if all compliance tariffs are approved to be effective July 1, 2023, because this will allow the rates determined by this Commission to be just and reasonable rates to in fact be charged for the electric service provided by the Company and will allow the new rates to take effect as close as possible to the date agreed upon by the signatories to the Stipulation and contemplated by the legislature.

4. This Motion was filed as soon as it could have been under the circumstances given that the four additional tariff sheets were just developed and finalized today.

WHEREFORE, for the foregoing reasons and for good cause shown, Ameren Missouri respectfully requests that the Commission grant this *Motion*, approve the additional four tariff sheets along with all of the compliance tariff sheets Ameren Missouri has filed to be effective for service rendered on and after July 1, 2023, and for such other and further relief as the Commission deems appropriate under the circumstances.

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Respectfully submitted,

<u>/s/ Jermaine Grubbs</u>

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

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of June, 2023, a copy of the foregoing filing was served, via e-mail, on counsel for the Missouri Public Service Commission Staff, the Office of the Public Counsel, all parties of record, as well as entities who have sought to intervene in File No. ER-2022-0337.

<u>/s/ Jermaine Grubbs</u>

Jermaine Grubbs