

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

In the Matter of Union Electric Company d/b/a        )  
Ameren Missouri for a Variance from                )        File No. GE-2019-0386  
4 CSR 240-13.020(6).                                    )

**RESPONSE**

**COMES NOW** Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "the Company"), and pursuant to the *Order Directing Response to Staff Recommendation* issued by the Missouri Public Service Commission ("Commission") in this case, states as follows:

1.       On June 5, 2019, Ameren Missouri submitted its *Notice of Case Filing and Request for Variance* ("*Notice and Application*") requesting a variance from 4 CSR 240-13.020(6) to allow it to implement tariff changes permitting its natural gas customers to choose a due date that would alter their billing cycles, together with a tariff with a July 5, 2019, effective date. On June 20, 2019, the Commission Staff ("Staff") recommended the Commission grant any necessary variances to implement the Pick Your Due Date program, as but reject the proposed tariff and instead direct a revised tariff be submitted more specifically reflecting the variances of the rules.

2.       Ameren Missouri accepts Staff's recommendation to increase the specificity with regard to the variance request in its tariff. The Company suggests the addition of the following language to the tariff should fulfill this recommendation:

This section reflects a variance granted by the Commission in File No. GE-2019-0386.

Ameren Missouri will not contest Staff's recommendation that the filed tariff be rejected. Assuming this variance request is granted, the Company will submit revised tariffs with new language shortly after an issuance of an order in this case.

3.       Staff also recommended that the Company provide "proof of the required notifications to newspapers and parties who represented residential customers in its most recent

rate case per Commission Rule 4 CSR 240-13.065(2)." The Company attaches to this pleading the following documentation of service via email of the applications upon parties to the ongoing natural gas rate case (File No. GR-2019-0077) and to newspapers in all counties where Ameren Missouri provides natural gas service:

- Service Email for *Notice and Application*
- Service Email for Natural Gas Tariff
- Email Distribution to Media Outlets for Natural Gas Only
- Email Distribution to Media Outlets for Electric and Natural Gas Combined<sup>1</sup>
- Email Distribution to Service List on File for Commission File No. GR-2019-0077 (Ameren Missouri's most recent natural gas rate case)
- List of Media Outlets (for both electric and natural gas service) to Whom Copies of the *Notice and Application* Were Provided.

**WHEREFORE**, Ameren Missouri respectfully requests that the Commission grant any variances necessary to enable the implementation of the Pick Your Due Date program.

Respectfully submitted,

/s/ Paula N. Johnson

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ATTORNEY FOR UNION ELECTRIC  
COMPANY, d/b/a AMEREN MISSOURI

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<sup>1</sup> In some counties, Ameren Missouri provides both natural gas and electric service.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the Staff of the Commission and the Office of the Public Counsel on this via electronic mail (e-mail) on this 21<sup>st</sup> day of June, 2019.

*/s/ Paula N. Johnson* \_\_\_\_\_

Paula N. Johnson