

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

In the Matter of Union Electric Company	)	
d/b/a Ameren Missouri's Request for a	)	File No. EE-2019-
Variance of the Timing of its submission	)	
of Annual Affiliate Transaction Information.	)	

**REQUEST FOR VARIANCE FROM 4 CSR 240-20.015(4)(B) AND 4 CSR 240-40.015(4)(B) AND MOTION FOR EXPEDITED TREATMENT**

**COMES NOW** Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") and for its *Request for Variance from 4 CSR 240-20.015(4)(B) and 4 CSR 240-40.015(4)(B)* ("*Request*"), states as follows:

1. Pursuant to the Commission's Affiliate Transactions Rule (4 CSR 240-20.015(4)(B) (electric) and 4 CSR 240-40.015(4)(B) (gas) ("Rule"), Ameren Missouri provides affiliate transaction information on a calendar year basis to the Commission Staff and the Office of Public Counsel on or before March 15<sup>th</sup> of the succeeding year. Such information has historically been included in the Company's annual Cost Allocation Manual ("CAM") submittal, which the Company has historically submitted by March 15<sup>th</sup> of each year.

2. The Federal Energy Regulatory Commission ("FERC") Form 1 (and FERC Form 2) affiliate transaction information, which is provided by the Company to comply with the Rule, is not due to FERC until April 18<sup>th</sup>. 18 C.F.R. §141.1.

3. Therefore, in the interest of efficiency, Ameren Missouri seeks a variance from Section 20.015(4)(B) and Section 40.015(4)(B) to allow the Company to file the annual affiliate transaction information called for by the Rule on or before May 15<sup>th</sup>, instead of on or before March 15<sup>th</sup>, to better correspond with the development and submission of FERC Form 1 and 2 affiliate transaction information. A filing on or before May 15<sup>th</sup> is consistent with the process provided for

in the CAM agreed upon between the Company and the Staff which is attached as Exhibit A to the November 30, 2018 *Stipulation and Agreement* submitted by the Company and the Staff in File No. EO-2017-0176. That agreement was reached so that the FERC Form information could be leveraged for use in the annual Rule submittals, to gain both efficiency and consistency in reporting to the ultimate benefit of Ameren Missouri's customers.

4. For the foregoing reasons, there is good cause to grant the requested variance that extends the due date for the reporting required by the Rule to May 15<sup>th</sup>.

5. Furthermore, both Commission Staff and the Office of Public Counsel have indicated that they do not object to the requested variance and the resulting extension for the filing of Ameren Missouri's annual affiliate transaction information under the Rule from March 15<sup>th</sup> to May 15<sup>th</sup>.

6. The Company requests an expedited ruling on this *Request* as contemplated by 4 CSR 240-2.080(14) and a ruling on the *Request* by February 20, 2019. An expedited ruling is appropriate given that otherwise, Ameren Missouri will have to devote time and resources to developing its annual CAM submittal (for activity in 2018) pending considering of this *Request* in order to meet the current March 15 deadline. There will be no harm to customers or the general public from expediting the Commission's ruling on the *Request*, and the harm of having to commit resources to preparing a March 15 submittal in the absence of having the annual FERC Form data available will be avoided. This *Request* was filed as soon as it could have been under the circumstances.

**WHEREFORE**, Ameren Missouri asks the Commission to grant it a variance from 4 CSR 240-20.015(4)(B) and 4 CSR 240-40.015(4)(B) as described above by February 20, 2019.

Respectfully submitted,

/s/ James B. Lowery

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served on all parties of record via electronic mail (e-mail) on this 13th day of February, 2019.