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

In the Matter of the Union Electric	)	Case No. GR-2018-0346
Company d/b/a Ameren Missouri's Purchased Gas Adjustment Tariff Filing	)	
	)	

## **STAFF RESPONSE**

**COMES NOW** the Staff of the Missouri Public Service Commission in the above-captioned matter and for its *Response* to the *Request for Variance from 4 CSR 240-2.090(2)(C) and Applicable Tariff Provisions* ("Request") filed herein on September 27, 2018, by Union Electric Company d/b/a Ameren Missouri ("Ameren" or "Company") as ordered by the Commission's *Order Directing Filing* issued October 2, 2018, states as follows:

- 1. Staff is aware that the Company is currently experiencing some resource constraints due to new staff in the process of training, as stated in paragraph number 2 of the Company's Request. In paragraph number 2 of its Request the Company also represents that "Ameren Missouri believes it will be able to respond to data requests issued by Staff by January 31, 2019. Additionally, the Company will as has been its consistent practice in its PGA and ACA filings provide answers to data requests as they become available between their issuance and the extended deadline. The Company will also prioritize responses to certain data requests upon request of Staff so that the responses can be given attention accordingly." (Emphasis added)
- 2. Under the circumstances, and based on the representations contained in the Company's Request, Staff does not object to Ameren's request for variance.

**WHEREFORE**, Staff submits this Response as ordered by the Commission's Order Directing Filing issued October 2, 2018.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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## **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 5<sup>th</sup> day of October, 2018.

/s/ Jeffrey A. Keevil