

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

Ameren Missouri's Request for Variances)
for its Renewable Energy Standard) Case No. GE-2014-
Rebate Tariff.)

REQUEST FOR VARIANCE

COMES NOW Union Electric Company, d/b/a Ameren Missouri (Ameren Missouri or the Company), and for its request for variances from certain portions of the Missouri Public Service Commission's (Commission) rules related to deposit practices, states as follows:

1. 4 CSR 240-13.030 governs the conditions under which Ameren Missouri may require a deposit from a new applicant.

2. Ameren Missouri requests a variance from 4 CSR 240-13.030(1)(C), specifically the language establishing *prima facie* credit rating as set forth in (C) 1, 2 and 3. The language in this portion of the rules states that if an applicant can meet any of the following criteria, the applicant is presumed to have an acceptable credit history – owns or is purchasing a home, is or has been regularly employed on a full-time basis for at least one year, has an adequate regular source of income, or can provide adequate credit references from a commercial credit source.

3. Concurrent with this pleading, Ameren Missouri is filing a tariff to implement credit rating criteria to be used for new applicants for service only. A copy of the tariff is also attached to this pleading.

4. The rules from which Ameren Missouri requests a variance are so broad and unverifiable as to be of little value in identifying when it is appropriate to seek a deposit from a new applicant. Ameren Missouri has no way to know if these applicants own their homes, whether they are regularly employed on a full-time basis, or whether they have an adequate source of income. Effectively, these criteria mean that Ameren Missouri does not collect deposits from new applicants.

5. This request would change that practice. Instead of relying upon criteria it cannot confirm, the Company seeks to engage Equifax to assist it in determining when to request a deposit from a new applicant for service. Equifax will view each new applicant's Equifax Advanced Energy Risk Score (EAER Score) and, if that score is 699 or below, Ameren Missouri will require a deposit from that customer. Ameren Missouri personnel will not have access to the applicant's EAER score, other than to know whether a deposit should be requested. The rest of the language in 4 CSR 240-13.030(1)(C) is consistent with the filed tariff and Ameren Missouri does not seek a variance from that language.

6. Ameren Missouri seeks a balanced methodology for determining when it is appropriate to require a deposit and it believes that this variance request, along with the tariff it has filed, meets that goal.

WHEREFORE, Ameren Missouri requests the Missouri Public Service Commission approve the variance request as set forth above.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a Ameren Missouri

/s/ Wendy K. Tatro

Wendy K. Tatro, #60261

Corporate Counsel

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Dated: December 9, 2013

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the service list of record this 9th day of December, 2013.

/s/ Wendy K. Tatro

Wendy K. Tatro

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

X. Deposit Practices

*A. Residential Customers

1. Deposit requirements for initial service - Company may, as a condition to furnishing service initially, require any applicant for residential service to make a cash deposit or furnish a written guarantee of a responsible party, due to any of the following:
 - a. The applicant has an unpaid bill which accrued within the last five (5) years and at the time of the request for service remains unpaid and not in dispute; or
 - b. The applicant has in an unauthorized manner, within the past five (5) years prior to applying for service, interfered with or diverted the service of a utility in the provision of the same type of service; or
 - c. The applicant has not had service with the Company within the past five (5) years and has an Equifax Advanced Energy Risk Score (EAER Score) of 699 or lower. Those customers without an EAER Score will not be assessed a deposit under this subsection, or
 - d. The customer fails to provide proof of identity upon request. Proof of identity is to include official picture identification or other verifiable documentation of identity, and correct social security number.
2. Deposit requirements for continued service - Company may, as a condition of continued service, require any residential customer to make a cash deposit or furnish a written guarantee of a responsible party, due to any of the following:
 - a. The service of the customer has been disconnected for nonpayment of a delinquent account not in dispute;
 - b. The customer has in an unauthorized manner interfered with or diverted the service of Company situated on or about or delivered to the customer's premises;

* Indicates Change

DATE OF ISSUE December 9, 2013 DATE EFFECTIVE February 7, 2014

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

X. Deposit Practices (Cont'd.)

2. Deposit refunds - The credit of the residential customer will be established and the deposit and accrued interest, if any, will be refunded, or the guarantor released, upon satisfactory payment before the delinquency date of all undisputed charges for service for a period of twelve successive months, or customer has closed his account. The credit of the non-residential customer will be reviewed after three years and the deposit returned if in the opinion of the Company, the customer has established satisfactory credit. The Company may withhold refund of the deposit or release of the guarantor pending the resolution of a matter in dispute involving disconnection for nonpayment or unauthorized interference by the customer. The Company may apply all deposits subject to refund and accrued interest, if any, against undisputed utility charges provided the amount of the refund is identified and disclosed on the bill.
- *3. Interest paid on deposits - Interest will be credited annually on all residential deposits. Interest will be either credited to the service account of the residential customer on an annual basis or paid upon the return of the deposit. Simple interest will be payable upon the return of a non-residential deposit held by the Company for six months or longer. Interest shall not accrue on any cash deposit after the date the deposit is applied to the customer's account, or Company has made a reasonable effort to return such deposit to the customer. Interest will be paid at a per annum rate equal to the prime bank lending rate, as published in the Wall Street Journal for the last business day of November of the preceding calendar year, plus one percentage point.
4. Final billed accounts - Upon discontinuance or termination, other than for a change of service address, the deposit, with accrued interest, will be credited to the final bill and the balance, if any, will be returned within twenty-one (21) days of the rendition of the final bill.

* Indicates Change.

Issued Pursuant to the Order of the Mo.P.S.C. in Case No. GR-2007-0003

DATE OF ISSUE December 9, 2013 DATE EFFECTIVE February 7, 2014

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address