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

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In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of its Surge Protection Program.

File No. ET-2021-0082

## AMEREN MISSOURI'S REPLY TO STAFF RESPONSE

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), and for its reply to Staff's December 2, 2020 Response, states as follows:

- 1. Staff's above-referenced response makes no new arguments, makes no attempt to rebut the fact that there are material facts in dispute, and fails rebut the fact that before one can apply the law to the facts, the facts need to be fully developed. The Company still wants a hearing, and believes that it is clear that the Commission needs to have one to properly consider and decide on this case.
- 2. As indicated in its Response to Staff Recommendation (filed November 20, 2020), Ameren Missouri has extended the effective date of the tariff accompanying the Application pending in this docket to April 30, 2021 to afford the parties and the Commission time to properly resolve this case.

Respectfully submitted,

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

# **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 via electronic mail (e-mail) on this 4th day of December, 2020.

> /s/ James B. Lowery James B. Lowery