

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Purchased Gas) GR-2018-0346
Adjustment Tariff Filing.)

**REQUEST FOR VARIANCE FROM 4 CSR 240-2.090(2)(C)
AND APPLICABLE TARIFF PROVISIONS**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") and for its *Request for Variance from 4 CSR 240-2.090(2)(C) and Applicable Tariff Provisions* ("Request"), states as follows:

1. Pursuant to Ameren Missouri's tariff Sheet No. 29.1 addressing its Purchased Gas Adjustment ("PGA") Clause, when the Company makes its annual Actual Cost Adjustment ("ACA") reconciliation filing, it shall:

Provide all documentation of all natural gas purchases (commodity, demand or reservation charges or other charges) to support that the claimed costs are properly attributed to the ACA period and that the pipelines, natural gas suppliers, and any other vendors have charged or invoiced the Company for the volumes nominated and received at the proper rates.¹

Ameren Missouri has typically accomplished this documentation through responses to data requests issued by the Staff of the Missouri Public Service Commission ("Staff" and "Commission," respectively). The Commission's rules of practice and procedure generally require that the Company respond to data requests within 20 days of their issuance.² Ameren Missouri is already aware that it will require more than 20 days to provide responses to the data requests Staff began issuing on September 27, 2018.

¹ Sheet No. 29.1, Rider A, Purchased Gas Adjustment Clause, Section 10(a).

² 4 CSR 240-2.060(2)(C). The Company acknowledges that 4 CSR 240-2.060(2)(D) and (E) provide alternative means by which to request additional time to provide data request responses. However, because of the tariff provision found in Sheet No. 29.1, the Company believes a formal request for variance is warranted.

2. Ameren Missouri has good cause to request this extension because it is aware that it will have internal resource constraints between now and the end of the year. These internal resource constraints are due to new staff in the process of training and the Company's internal resources will be constrained by the implementation of its new Risk Management System. That said, 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.

3. In light of the above, Ameren Missouri has a valid reason for the requested delay (i.e., internal resource constraints), as well as a means to prevent and/or mitigate any inconvenience such a delay might cause to Staff (i.e., the willingness and ability to prioritize responses and a final date for all responses that still falls within a reasonable time period).

WHEREFORE, Ameren Missouri asks the Commission to grant it a variance from its tariff Sheet No. 29.1 and from 4 CSR 240-2.090(2)(C).

Respectfully submitted,

/s/ Paula N. Johnson

Paula N. Johnson, #68963
Senior Corporate Counsel
Union Electric Company
d/b/a Ameren Missouri
P.O. Box 66149 (MC 1310)
1901 Chouteau Avenue
St. Louis, MO 63166-6149
(T) 314-554-3533
(F) 314-554-4014
AmerenMOService@ameren.com

**ATTORNEY 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 all parties of record via electronic mail (e-mail) on this 27th day of September, 2018.

/s/ Paula N. Johnson

Paula N. Johnson