

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

In the Matter of Union Electric)	
Company d/b/a Ameren Missouri's)	Case No. GR-2013-0100
ACA Audit.)	

**MOTION FOR VARIANCE FROM
TARIFF PROVISION**

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company) and for its *Motion for Variance from Tariff Provision*, states as follows:

1. On or around October 17, 2012, Ameren Missouri will file revised tariff sheets to modify its Regular Purchased Gas Adjustment (RPGA) tariff for its Missouri natural gas service area.

2. Ameren Missouri asks the Missouri Public Service Commission (Commission) to allow a variance from the definition of "base period" found in Section I(B) of its P.S.C. 7th Revised Sheet No. 24, a part of Rider A, the Purchased Gas Adjustment Clause. That definition provides that the PGA is calculated using "the first twelve (12) of the thirteen (13) months immediately preceding the filing month." The sales volumes of the base period are used in calculating the commodity-related charges as well as demand-related charges (found at Section II(A) and (B) of its P.S.C. 7th Revised Sheet No. 24) for the new RPGA rate.

3. Due to the record-breaking warm winter of 2011-2012, Ameren Missouri experienced sales volumes over the thirteen months preceding this filing that were less than 80% of the normal sales volume. Ameren Missouri believes that using these very low sales volumes will result in an inaccurate reflection of future sales levels. This directly impacts the calculation of the RPGA rate and would lead to a higher RPGA rate than is appropriate.

4. Ameren Missouri asks the Commission to grant it a variance from this definition and allow the Company to use sales volumes as of the twelve months ending August of 2011. The Company believes this sales volume level is a better reflection of the volumes anticipated for the next year.

WHEREFORE, for the reasons stated herein, Ameren Missouri respectfully requests the Missouri Public Service Commission grant it a variance from the above-cited section of the Company's natural gas tariff sheets.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ Wendy K. Tatro

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 13th day of September, 2012, to all parties on the Commission's service list in this case.

/s/ Wendy K. Tatro