

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

In the Matter of Ameren Missouri’s Request)
for Variance from Portions of)
4 CSR 240-20.065 and 4 CSR 240-20.100) File No. EE-2017-0235

REPLY TO OPC RESPONSE AND STAFF RECOMMENDATION

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and in response to the *Office of the Public Counsel's Response* (“*Response*”) and to *Staff’s Recommendations Regarding Ameren Missouri’s Requested Variances* (“*Recommendations*”) submits this Reply. In support of its position, Ameren Missouri states as follows:

BACKGROUND

1. On March 13, 2017, Ameren Missouri submitted its *Request for Approval of Tariff and for Variance* (“*Request*”). Ameren requested these variances to provide additional clarifying language to reduce customer confusion, expedite processing, and to better reflect steps required to implement net metering for participating Ameren Missouri customers. §393.1030 RSMo., et. seq. The *Request* included revisions to:

Table 1 – Original Variance Request

Request #	Variance Requested	Previously Granted¹
1	Multiple Locations - Substitute the word “Company” in place of “Ameren Missouri”	Y
2	Sheet No. 171.6 - Use the term “bi-directional meter” in place of “net meter” when the equipment is referenced rather than the billing methodology	N

¹ File No. ET-2013-0197.

Request #	Variance Requested	Previously Granted¹
3	Sheet No. 171.6 - Replace “Inspection” with “Company’s inspection” as appropriate to avoid confusion between inspections by the Company and local Authority Having Jurisdiction	N
4	Sheet No. 171.6 - Revise language to reflect limited availability of solar rebates and complexity of the solar rebate queue (see <i>Stipulation and Agreement</i> in File No. ET-2014-0085)	N
5	Interconnection Application/Agreement, Section B - Add clarity to information required regarding a disconnect switch and reduce the number of required Company-customer communications	Y
6	Interconnection Application/Agreement, Section C - Delete “Person or Agency Who Will Inspect/Certify Installation...” given the definition of local Authority Having Jurisdiction in the revised statute	Y
7	Interconnection Application/Agreement, Section D.5. – Revise to either:	
7a	a - “The Customer-Generator shall be responsible for all other bill components charged to similarly situated customers that are not Customer-Generators”	N
	or	
7b	b – Replace “customer charges” with “minimum bill”	Y
8	Interconnection Application/Agreement, <i>New</i> Section D.10. - Include a new section D.10. in compliance with the <i>Stipulation and Agreement</i> filed in File No. ER-2016-0179.	N
9	Interconnection Application/Agreement, Section I - Delete language in the “Solar Rebate Declaration” and, after listing the potential rebate amounts, add a sentence directing customers to the Company’s Rider SR-Solar Rebate at www.ameren.com .	N

2. On March 23, 2017, the Office of the Public Counsel (“OPC”) submitted its *Response*, raising no objections to the variances requested, and supporting the adoption of the variance #7b reflected in the table above.

3. Also on March 23, 2017, the Staff of the Public Service Commission of the State of Missouri (“Staff”) submitted its *Recommendations*. Staff indicated that it did not object to Request numbers 1, 2, 3, 5, and 7a. Staff also indicated its support for Request numbers 4, 8, and 9. However, Staff opposed Request numbers 6 and 7b, for the following reasons:

- Variance #6 – Staff clarifies that Sections A through D are generally submitted and reviewed prior to construction, while Section E and F are completed after construction; accordingly, the language regarding inspections and certifications of installations in Sections C and E are not actually duplicative. Instead, Section C informs customers of certification/inspection requirements at the beginning of the process, while Section E requires the certification/inspection requirements’ completion.
- Variance #7b – Staff notes that it does not oppose the language in Variance #7a, but feels it is unnecessary. However, Staff recommends Variance #7b be rejected. Staff noted that the Commission previously addressed replacing “customer charge” with “minimum bill” in File No. EX-2014-0352, specifically rejecting the suggestion because “neither is clearly more appropriately used.”

DISCUSSION

4. Ameren Missouri appreciates the input and suggestions of both parties. After examining both OPC’s *Response* and Staff’s *Recommendations*, the Company believes additional revisions may be necessary. Accordingly, Ameren Missouri is simultaneously filing, and including with this pleading as Attachment A, two specific revisions to Tariff Sheet No. 171.9, as well as to its *Request* which has been modified from the version initially submitted in this docket.

5. First, Ameren Missouri acquiesces to Staff’s position on Variance #6, and withdraws its request for modification of Interconnection Application/Agreement, Section C. Ameren Missouri can appreciate Staff’s position that these requirements are not duplicative, but rather address two different stages of the customer process.

6. Second, the Company acknowledges its oversight with regard to the two options for language presented in Request numbers 7a and 7b; the Commission has indeed already

rejected requests to replace the term “customer charge” with “minimum bill.” The Company’s use of this language in its tariffs was previously approved in a Missouri Public Service Commission (“Commission”) Order issued in File No. ET-2013-0197 on November 28, 2012. Subsequently, however, as noted by Staff, the Commission determined this substitution of terms was unnecessary. The Commission’s Order on Rulemaking containing this rejection can be found in File No. EX-2014-0352, which was published in Volume 40, No. 20 of the Missouri Register on October 15, 2015, page 1486, and with the relevant language found at page 1487. Accordingly, Ameren Missouri will withdraw the request for approval of Variance #7b. Since the Company submitted Variance #7a with its initial tariff filing, no update to the tariff sheet submitted on March 13, 2017, is required. Because the Company has accepted Staff’s recommendations, it is now only requesting the following Variances, as explained in more detail in its initial *Request*:

Table 2 – Revised Variance Request

Request #	Variance Requested	Previously Granted²
1	Multiple Locations - Substitute the word “Company” in place of “Ameren Missouri”	Y
2	Sheet No. 171.6 - Use the term “bi-directional meter” in place of “net meter” when the equipment is referenced rather than the billing methodology	N
3	Sheet No. 171.6 - Replace “Inspection” with “Company’s inspection” as appropriate to avoid confusion between inspections by the Company and local Authority Having Jurisdiction	N
4	Sheet No. 171.6 - Revise language to reflect limited availability of solar rebates and complexity of the solar rebate queue (see <i>Stipulation and Agreement</i> in File No. ET-2014-0085)	N

² File No. ET-2013-0197.

Request #	Variance Requested	Previously Granted²
5	Interconnection Application/Agreement, Section B - Add clarity to information required regarding a disconnect switch and reduce the number of required Company-customer communications	Y
6	Interconnection Application/Agreement, Section C - Delete “Person or Agency Who Will Inspect/Certify Installation...” given the definition of local Authority Having Jurisdiction in the revised statute	Y
7	Interconnection Application/Agreement, Section D.5. - Revise to either:	
7a	a - “The Customer-Generator shall be responsible for all other bill components charged to similarly situated customers that are not Customer-Generators”	Y
7b	or b - Replace “customer charges” with “minimum bill”	N
8	Interconnection Application/Agreement, <i>New</i> Section D.10. - Include a new section D.10. in compliance with the <i>Stipulation and Agreement</i> filed in File No. ET-2016-0179.	N
9	Interconnection Application/Agreement, Section I - Delete language in the “Solar Rebate Declaration” and, after listing the potential rebate amounts, add a sentence directing customers to the Company’s Rider SR-Solar Rebate at www.ameren.com	N

7. As previously noted, please refer to Attachment A to this pleading, which contains the revised Tariff Sheet No. 171.9 associated with the elimination of Request #6. The Company is also simultaneously and separately substituting the revised Tariff Sheet No. 171.9 for approval with the previously submitted tariffs. The elimination of Request #7b does not result in any tariff sheet revisions because the original filing included language for #7a but not #7b. Ameren Missouri suggests that notice has already been appropriately given for approval of these revisions, and asks that a new effective date not be required.

WHEREFORE, Ameren Missouri requests the Commission approve the tariffs as filed and modified, and approve the modified variances illustrated in Table 2 above.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ Paula N. Johnson

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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 29th day of March, 2017, to Staff General Counsel and the Office of the Public Counsel.

/s/ Paula N. Johnson

MO.P.S.C. SCHEDULE NO. 6 2nd Revised SHEET NO. 171.9
CANCELLING MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 171.9

APPLYING TO MISSOURI SERVICE AREA

INTERCONNECTION APPLICATION/AGREEMENT FOR NET METERING SYSTEMS WITH CAPACITY OF 100 kW OR LESS - (Cont'd.)

* C. Installation Information/Hardware and Installation Compliance

Company Installing System:
Contact Person of Company Installing System: Phone Number:
Contractor's License No. (if applicable):
Approximate Installation Date:
Mailing Address:
City: State: Zip Code:
Daytime Phone: Fax: E-Mail:
Person or Agency Who Will Inspect/Certify Installation:

The Customer-Generator's proposed System hardware complies with all applicable National Electrical Safety Code (NESC), National Electrical Code (NEC), Institute of Electrical and Electronics Engineers (IEEE) and Underwriters Laboratories (UL) requirements for electrical equipment and their installation. As applicable to System type, these requirements include, but are not limited to, UL 1703, UL 1741 and IEEE 1547. The proposed installation complies with all applicable local electrical codes and all reasonable safety requirements of Company. The proposed System has a lockable, visible AC disconnect device, accessible at all times to Company personnel and switch is located adjacent to the Customer-Generator's electric service meter (except in cases where Company has approved an alternate location). The System is only required to include one lockable, visible disconnect device, accessible to Company. If the interconnection equipment is equipped with a visible, lockable, and accessible disconnect, no redundant device is needed to meet this requirement.

The Customer-Generator's proposed System has functioning controls to prevent voltage flicker, DC injection, overvoltage, undervoltage, overfrequency, underfrequency, and overcurrent, and to provide for System synchronization to Company's electrical system. The proposed System does have an anti-islanding function that prevents the generator from continuing to supply power when Company's electric system is not energized or operating normally. If the proposed System is designed to provide uninterruptible power to critical loads, either through energy storage or back-up generation, the proposed System includes a parallel blocking scheme for this backup source that prevents any backflow of power to Company's electrical system when the electrical system is not energized or not operating normally.

Signed (Installer): Date:
Name (Print):

*Indicates Change

DATE OF ISSUE March 13, 2017 DATE EFFECTIVE April 12, 2017
ISSUED BY Michael Moehn President St. Louis, Missouri
NAME OF OFFICER TITLE ADDRESS