

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

In the Matter of Union Electric Company)	
d/b/a Ameren Missouri's Tariff Revising its)	Case No. ET-2011-
Net Metering Tariff.)	Tariff No.

**REQUEST FOR WAIVER OF A PORTION OF COMMISSION REGULATIONS
GOVERNING NET METERING AND MOTION TO ACCEPT LATE FILING**

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or the Company) and for its *Request for Waiver of a Portion of Commission Regulations Governing Net Metering and Motion to Accept Late Filing*, states as follows:

1. Concurrent with this filing, Ameren Missouri is submitting a revision to its net metering tariff.

2. The revised tariff implements several changes made necessary by the Missouri Public Service Commission's (Commission) modification of its Net Metering rule (Net Metering rule) (4 CSR 240-20.065) and of the newly approved Electric Utility Renewable Energy Standard Requirement rule (RES rule) (4 CSR 240-20.100). The RES rule requires that net metering contracts clearly specify that the customer-generator owns the REC's. This change is reflected on Sheet 18 of the revised tariff sheets. The other revisions are to comply with changes to the Net Metering rule including: adding the avoided fuel cost (Sheet 9), revising the system types that qualify for net metering (Sheet 14) and adding insurance language (Sheet 16).

3. Ameren Missouri requests a waiver of a requirement found in the Net Metering rule within the *Interconnection Application/Agreement for Net Metering Systems with Capacity of One Hundred Kilowatts (100 kW) or Less* (Application). The

Application requires the Customer-Generator to provide the manufacturer name plate AC Power Rating. It has been Ameren Missouri's experience that the solar industry typically lists the "Manufacturer Name Plate" capacity in the DC measurement and not in AC measurement. To date, in almost all net metering applications received by Ameren Missouri, the installer or customer defaults to listing the DC Manufacturer's Name Plate capacity because that is what is provided on the manufacturer's specification sheet. Allowing Ameren Missouri to use DC Power Rating instead of AC Power Rating in the Application will help to eliminate this confusion.

4. Ameren Missouri is required by 4 CSR 240-20.065(1)(A), (definition of *avoided fuel cost*) to include in its net metering tariff its annual average cost of fuel and to update annually within thirty days of the submission of its annual report. Ameren Missouri's filing is not within the thirty days and so the Company requests the Commission accept this filing out of time. Ameren Missouri does not use its annual average cost of fuel but rather pays its cogeneration rate to customers on its net metering tariff. Accordingly, the Company does not believe there has been any harm caused by this late filing.

WHEREFORE, Ameren Missouri respectfully requests the Commission accept this filing out of time, issue an order approving the Net Metering tariff and waive the portion of its Net Metering rule which requires a Customer-Generator to provide an AC Power Rating and allow the use of the DC Power Rating instead.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

By: /s/ Wendy K. Tatro

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Dated: October 7, 2010

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 7th day of October, 2010.

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