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

In the Matter of Union Electric Company ) d/b/a Ameren Missouri's Tariffs to Increase Its ) File No. GR-2019-0077 **Revenues for Natural Gas Service** 

#### MOTION FOR EXPEDITED TREATMENT OF TARIFF SHEETS

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), and pursuant to the Commission's Order to File Conforming Tariff in the abovecaptioned case issued August 16, 2019 (the "Order") and 4 CSR 240-2.080(14), hereby files its Motion for Expedited Treatment of Tariff Sheets ("Motion"). In support of its Motion, Ameren Missouri states as follows:

1. On August 15, 2019, the Commission held an on-the-record presentation regarding the Stipulations and Agreements ("Stipulations") filed in this matter resolving all contested issues in this case.

2. On August 16, 2019, the Commission issued its Order to File Conforming Tariff in this proceeding, which instructs Ameren Missouri to file tariffs in compliance with the terms of the Stipulations by 5:00 p.m. on August 16, 2019.

3. Concurrent with this filing, Ameren Missouri has filed the conforming tariff sheets as instructed by the Order. Those revised tariff sheets bear an issue date of August 16, 2019, and show an effective date of September 15, 2019. However, the Company must note that the Missouri School Board Association ("MSBA") pilot program, which is described on the Company's Gas Service Schedule 2, Sheet No. 16, will not commence until the November 2019 billing month.

4. Section 393.140(11), RSMo, specifies that, unless the Commission orders otherwise, a change shall not be made to any rate filed by a gas corporation except after thirty days' notice to the Commission and publication for thirty days as required by order of the

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Commission. However, Section 393.140(11) expressly provides that, for good cause shown, the Commission may allow tariff changes without requiring thirty days' notice. Good cause exists to make the Company's compliance tariffs effective on September 1, 2019, as the *Stipulations* provide for Ameren Missouri's new gas rates to go into effect as soon as practicable. Moreover, the Commission has already instructed the Company to file the tariffs that are filed concurrently with this *Motion*.

5. As provided for in 4 CSR 240-2.080(14), the Company requests that the Commission approve the compliance tariffs so that the tariffs take effect on September 1, 2019. As noted earlier, the Commission has good cause to do so. There can be no negative effect on anyone – ratepayers or the Company – if the compliance tariffs are approved to be effective September 1, 2019, because this will allow the new rates to take effect as close as possible to the date agreed upon by the signatories to the *Stipulations*.

6. This *Motion* was filed as soon as it could have been under the circumstances.

WHEREFORE, for the foregoing reasons and for good cause shown, Ameren Missouri respectfully requests that the Commission grant this *Motion*, approve the tariff sheets Ameren Missouri has filed to be effective for service rendered on and after September 1, 2019, with the only exception of the MSBA pilot program described above, and for such other and further relief as the Commission deems appropriate under the circumstances.

(Signature on next page)

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Respectfully submitted,

# /s/Jermaine Grubbs

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ATTORNEY FOR UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>th</sup> day of August, 2019, a copy of the foregoing filing was served, via e-mail, on counsel for the Missouri Public Service Commission Staff, the Office of the Public Counsel, all parties of record, as well as entities who have sought to intervene in File No. GR-2019-0077.

<u>/s/ Jermaíne Grubbs</u> Jermaine Grubbs

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