

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

In the Matter of a Determination of Special)	
Contemporary Resource Planning Issues to be)	
Addressed by Ameren Missouri in its Next)	File No. EO-2015-0039
Triennial Compliance Filing or Next Annual)	
Update Report.)	

AMEREN MISSOURI'S REQUEST FOR WAIVER

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company), and for its *Request for Wavier*, states as follows:

1. Ameren Missouri will submit its next comprehensive triennial Integrated Resource Plan (IRP) filing on October 1, 2014. Normally, this filing would occur on April 1, 2014. This year, however, the filing was delayed at Ameren Missouri's request and with the approval of the Missouri Public Service Commission (Commission).

2. The Commission's IRP rules (4 CSR 240-22.080(3)) require an annual update workshop and report on or about April 1st of each year, with an annual update report to be filed with the Commission at least twenty (20) days prior to the annual update workshop. Ameren Missouri requests a waiver of this requirement for 2015.

3. 4 CSR 240-22.080(3) requires the Company to provide, among other items, an update on the resolution of any deficiencies from its IRP as well as its progress in implementing its resource acquisition strategy, which is reflected in its IRP. The rule assumes an order has been issued on the Company's IRP filing, as evidenced by, for example, the fact that until a Commission order on each triennial IRP filing has been issued, there will have been no identification of any deficiencies upon which to provide an update.

4. The Commission's IRP rules that govern the processing of a utility's triennial IRP filing also provide for review of a utility's triennial IRP filing by Commission staff and other

stakeholders and reports based on that review within 150 days of the utility's filing. In this case, those reports would not be due until February 28, 2015, just 31 days before the annual update report would otherwise be due.

5. The Commission's IRP rules further provide for the filing of a joint agreement regarding any agreed upon remedies for alleged deficiencies or concerns among the utility, the Commission staff and other stakeholders within 60 days of the filing of reports by the Commission staff and other stakeholders (which would be due April 29, 2015). The rules also provide for the filing of a response by the utility regarding any alleged deficiencies or concerns for which agreement as to a remedy is not reached. This response must also be filed within 60 days of the filing of reports by the Commission staff and other stakeholders (which would be due by June 27, 2015). In this case, a joint agreement and/or a response from Ameren Missouri could be filed as late as June 27, 2015, after which time the Commission would issue an order indicating on what items, if any, a hearing will be held and establishing a procedural schedule.

6. It is a virtual certainty that the Commission will not have issued an order on Ameren Missouri's October 1, 2014, IRP filing before April 1, 2015. Looking back at the Company's last two IRP filings, both took longer than a year before the final order was issued. File No. EO-2007-0409 was filed on February 5, 2008, and the Commission's order was effective on March 1, 2009. File No. EO-2011-0271 was filed on February 23, 2011 and the final order was effective on April 27, 2012. This is primarily because there are typically multiple and complicated issues to be addressed in these proceedings and, normally, it takes time to resolve those issues, often times even longer than the timeline set forth in the Commission's IRP rules.

7. Ameren Missouri raises this request at this time, as the Commission has recently opened a Special Contemporary Issues docket for Ameren Missouri, consistent with the

regulations, which typically would result in a list of issues to be addressed in the Company's next annual update workshop and/or report. Ameren Missouri believes it is premature to order it to respond to new issues before its next IRP is resolved. Consequently, Ameren Missouri requests the Commission to grant it a waiver from the requirement found in 4 CSR 240-22.080(3) in its entirety and that the Company not be required to address any contemporary issues until its 2016 annual update workshop and/or report.

WHEREFORE, Ameren Missouri respectfully submits its request for a waiver of 4 CSR 240-22.080(3) in its entirety for 2015.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ Wendy K. Tatro

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Request was served on the parties of record in this case via electronic mail (e-mail) on this 3rd day of September, 2014.

/s/ Wendy K. Tatro

Wendy K. Tatro