

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

In the Matter of the Application of)	
Union Electric Company d/b/a Ameren)	
Missouri for an Order Changing Testing)	Case No.
Requirements for Single Phase Meters.)	

APPLICATION AND REQUEST FOR VARIANCE

Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri,” “Company” or “Applicant”), pursuant to 4 CSR 240-2.060 hereby submits to the Missouri Public Service Commission (“Commission”), its *Application and Request for a Variance* to give the Company authority to use statistical sample testing for the testing of network meters. In support of its request, Applicant states as follows:

I. APPLICANT

1. Union Electric Company is a Missouri corporation doing business under the fictitious name of Ameren Missouri, in good standing in all respects, with its principal office and place of business located at One Ameren Plaza, 1901 Chouteau Ave., St. Louis, Missouri 63103. Applicant is engaged in providing electric and gas utility services in portions of Missouri as a public utility under the jurisdiction of the Commission. There is already on file with the Commission a certified copy of Applicant’s Articles of Incorporation (See Case No. EA-87-105), Applicant’s Fictitious Name Registrations as filed with the Missouri Secretary of State’s Office (See Case Nos. GO-98-486 and EN-2011-0069) and Applicant’s Certificate of Corporate Good Standing (See Case No. EF-2012-0463), and said documents are incorporated herein by reference and made a part hereof for all purposes.

2. Pleadings, notices, orders and other correspondence and communications concerning this Application should be addressed to:

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And
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3. Applicant has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment, or decision has occurred within three years of the date of this Application, except for the appeal of Case No. ER-2011-0463 in the Western District Court of Appeals, WD74172.

4. Ameren Missouri has no overdue annual report or assessment fees.

II. REQUEST FOR VARIANCE FROM A PORTION OF 4 CSR 240-10.030(28)

A. BACKGROUND

5. On August 26, 1974, the Company filed an Application in Case No. 18,172 (“First Application”) seeking permission to depart from certain requirements of Rule 32 of the Commission’s General Order No. 20 (“Rule 32”) regarding the testing of electric service watt-hour meters. Rule 32 required that every electric service watt-hour meter in Missouri be periodically tested by the electric corporation furnishing the meter. The schedule of testing was based upon the year the meter was manufactured and the rated current capacity of the meter. The First Application requested relief from full compliance with Rule 32 for single phase meters and, in its place, requested to use an alternative testing procedure which utilized a standardized statistical sampling technique. The Commission approved the Company’s First Application in

an order dated March 12, 1975. A copy of the First Application and the Commission's *Report and Order* are attached as Schedules A and B.

6. On March 3, 2001, the Company filed an Application in Case No. EO-2001-0521 ("Second Application") requesting Commission approval to use the American National Standard Institute Sampling Procedures and Tables for Inspection by Attributes and by Variables (i.e. ANSI/ASQC1.4 and ANSI/ASQC1.9) (hereinafter, such standards shall collectively be referred to as "ANSI Standards"), which were a modernization of the sampling standards used previously by the Company. The Commission approved the Company's Second Application in an order dated September 11, 2001. A copy of the Second Application and the Commission's *Order Granting Variance* are attached as Schedules C and D.

B. CURRENT REQUEST

7. The Commission's regulations, at 4 CSR 240-10.030(28)(C), require utilities to test induction-type meters manufactured since 1937 at least every 240 months (every 20 years). In practice, Ameren Missouri tests meters not covered by the above described variance more frequently - at least every 16 years. As set forth above, Ameren Missouri has received a variance from the requirement that it test each of its single phase meters. The Company now requests the Commission extend that variance to include two phase, three wire, 120/208V meters (hereinafter referred to as "network meters") used primarily for apartment complexes and similar buildings in order to provide single phase service for residential customers. The Company currently has approximately 32,000 of these network meters in service that, absent the requested variance, it would be required to test in the 2013-2015 time period using current Ameren guidelines.

8. The Company proposes to use the same sample testing procedure for its network meters as was previously approved for single phase meters, which utilizes a standardized

statistical sampling technique as set forth in the ANSI Standards. This sample testing technique has allowed the Company to ensure the accuracy of its single phase meters while avoiding the costs of testing every single phase meter on its system. Ameren Missouri seeks Commission authority to extend this testing program to its network meters.

9. Ameren Missouri requests the Commission approve this request no later than the end of October of 2012, so that the Company has time to plan and implement the meter testing program. This will enable the Company to implement the variance in a timely manner and at a reduced cost, which benefit of Ameren Missouri customers.

10. Ameren Missouri does not anticipate, nor should it anticipate, that this matter will be a contested case. A hearing is not required in order to grant a waiver of a portion of the Commission's regulations. Accordingly, Ameren Missouri is not required to file a 60-day Notice of Filing pursuant to 4 CSR 240-4.020(2).

WHEREFORE, Ameren Missouri respectfully requests that the Commission grant it a variance which would allow the Company to use statistical sample testing for the testing of network meters, as set forth above and for such further relief as the Commission may find to be appropriate.

Respectfully Submitted,

/s/ Wendy K. Tatro

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**ATTORNEYS FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

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 3rd day of July, 2012.

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/s/ Wendy K. Tatro

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