

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

In the Matter of Ameren Missouri's                    )  
Application for Authorization to                    )       File No. ET-2014-0085  
Suspend Payment of Solar Rebates.                )

**APPLICATION FOR REHEARING**

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or the Company) and, pursuant to § 386.500.1, RSMo. and 4 CSR 240-2.160, respectfully applies for rehearing of the Commission's *Order Approving Tariff and Granting Variance* in the above-captioned proceeding, which was issued on December 12, 2013. In support of its application, the Company states as follows:

1.       On November 26, 2013, Ameren Missouri requested a variance from 4 CSR 240-20.100(4)(K) in order to implement a queue system for determining the order of customers to be paid solar rebates. On December 9, 2013, the Staff of the Missouri Public Service Commission (Staff) recommended the variance be approved, but that it be limited to the scenario where the Company would need more than 30 days to pay a rebate. The Missouri Public Service Commission granted the Company a limited variance, as suggested by Staff, on December 12, 2013.

2.       Ameren Missouri asks for rehearing on the issue of whether the limitation on the variance should be removed. While the Company agrees it needs the variance that was granted, that limited variance is only a portion of the variance that Ameren Missouri requires in order to implement a queue system for solar rebate payments. There are at least three more circumstances where a variance of subsection (4)(K) would be required in order to completely implement a queue system for paying rebates.

A. First, subsection (4)(K) requires the Company to make a rebate offer within 30 days of the date of receipt of the solar rebate application. In the situation where Ameren Missouri has already received enough applications to reserve the entire \$91.9 million rebate pool, then the Company will not make a rebate offer to new applicants. However, as previous applicants drop out of the queue, the Company will make rebate offers to the next applicants in line. Accordingly, the Company needs a variance of this 30 day requirement.

B. Second, subsection (4)(K) states that applications expire six months after the customer's acceptance of the rebate offer unless they file a report demonstrating "substantial project progress." However since, in certain circumstances, the Company may not send out a rebate offer within 30 days (as explained above), the six month time period should begin with the qualification date – which is the date a complete application is submitted to Ameren Missouri.

C. Third, subsection (4)(K) states that an application expires if the solar system is not operational within one year from the rebate offer. Similar to the request above, this date should be based upon the qualification date rather than the rebate offer date, since the rebate offer may be delayed if the application was received after the entire \$91.9 million rebate pool has been reserved.

3. All of the variance scenarios listed above are consistent with and necessary for the implementation of the solar rebate tariff the Commission previously approved.

WHEREFORE, for the reasons set forth above, the Company hereby respectfully requests that the Commission grant rehearing of its *Order Approving Tariff and Granting Variance* and grant Ameren Missouri a variance from 4 CSR 240-20.100(4)(K) sufficient to

permit it to implement the queue system for paying solar rebates.

Respectfully Submitted,

/s/ Wendy K. Tatro

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

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Application for Rehearing of Union Electric Company d/b/a Ameren Missouri was served via e-mail, to the parties of record to the above-captioned case on the 20<sup>th</sup> day of December, 2013.

*/s/ Wendy Tatro* \_\_\_\_\_  
Wendy Tatro