

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

Application of Union Electric Company d/b/a)	
Ameren Missouri for Approval of Decommissioning)	
Cost Estimate for Callaway Energy Center and Funding)	File No. EO-2018-
Level of Nuclear Decommissioning Trust Fund.)	

**NOTICE OF CASE FILING AND
REQUEST FOR WAIVER OF 60-DAY REQUIREMENT**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and for its *Notice of Case Filing and Request for Waiver of 60-Day Requirement* (“*Notice and Request for Waiver*”), states as follows:

NOTICE OF CASE FILING

1. 4 CSR 240-3.185(3) requires utilities to submit by September 1st every third year an application for approval of its decommissioning cost estimate for and its proposed funding level for the nuclear decommissioning trust fund. Ameren Missouri therefore provides this notice that, on September 1, 2017, it will be submitting its required application with regard to the Callaway Energy Center.

2. The issues likely to be before the Commission are those outlined in 4 CSR 240-3.185(3), which specify the requirements for the required decommissioning cost estimates and funding levels necessary to defray the commissioning costs, including any appropriate tariffs.

3. Ameren Missouri has had no communication with the Office of the Commission (as defined by 4 CSR 240-4.015(10)) regarding its 2017 triennial decommissioning filing within the last 150 days,¹ as demonstrated by Exhibit A attached hereto.

¹ Ameren Missouri is verifying the lack of communications for a 150-day time period rather than a 60-day period because of its *Request for Waiver*, contained in the following paragraphs.

REQUEST FOR WAIVER OF 60-DAY REQUIREMENT

4. Ameren Missouri will be submitting a triennial application for approval of its decommissioning cost estimate for Callaway Energy Center and its proposed funding level for the nuclear decommissioning trust fund. Because of the timing involved, Ameren Missouri seeks a waiver of 4 CSR 240-4.017 to accept notice of a case filing made in a shorter time period than the 60-day requirement.

5. Under 4 CSR 240-4.017(1)(D), waivers of the 60-day notice requirement may be granted for good cause shown. Good cause includes providing a verified statement that no communications have occurred with the office of the commission within the preceding 150 days regarding a substantive issue likely to be in the case, or that circumstances prevented filing the required notice and that requiring the notice would cause harm.²

6. As indicated in the verification attached as Exhibit A, Ameren Missouri has had no communications with the office of the Commission regarding any substantive issue likely to be in this case during the preceding 150 days. Moreover, Ameren Missouri's decommissioning filing schedule is required by 4 CSR 240-3.185(3) to be filed triennially by September 1st. The 60-day notice requirement of 4 CSR 240-4.017 did not become effective until July 30, 2017, which is 29 days after a 60-day notice would have been due in this matter.

7. For these reasons, Ameren Missouri has established good cause for a waiver from the 60-day requirement of 4 CSR 240-4.017(1).

WHEREFORE, Ameren Missouri respectfully submits its Notice of Case Filing and Request for Waiver of 60-Day Requirement, and requests 1) that its Notice of Case Filing be

² Pursuant to the Commission's *Order Waiving 60-Day Notice Requirement* issued on August 1, 2017, in File No. WM-2018-0023, this list is not exclusive, and the Commission may find that good cause has been established by other circumstances.

accepted and 2) that the 60-day requirement for this notice be waived given these particular circumstances.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ Paula N. Johnson

Paula N. Johnson, #68963

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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 16th day of August, 2017.

/s/ Paula N. Johnson

Paula N. Johnson

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AFFIDAVIT OF BRIAN F. HOLDERNESS

STATE OF MISSOURI)
) ss
CITY OF ST. LOUIS)

Brian F. Holderness, being first duly sworn on his oath, states:

1. My name is Brian F. Holderness. I work in the City of St. Louis, Missouri, and I am employed by Ameren Services Company as Environmental Specialist. I coordinate Ameren Missouri's triennial decommissioning studies, including work related the required triennial submission of decommissioning cost estimates and funding levels necessary to defray the decommissioning costs.

2. Neither Union Electric Company d/b/a Ameren Missouri nor any person on its behalf has had any communications with the office of the Commission regarding any substantive issue likely to be an issue in the case initiated by this filing during the preceding 150 days.

3. I hereby swear and affirm that the information contained is true and correct.


 Brian F. Holderness

Subscribed and sworn to before me this 16th day of August, 2017.


 Notary Public

My commission expires:

