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 and Farmers')	File No. EO-2018-
Electric Cooperative, Inc., for Approval of an)	
Addendum to an Approved Territorial Agreement.)	

REQUEST FOR WAIVER

Under authority of, and in accordance with, 4 CSR 240-4.017(1)(D), Union Electric Company d/b/a Ameren Missouri ("Company") and Farmers' Electric Cooperative, Inc. ("Cooperative"), jointly request a waiver of those portions of 4 CSR 240-4.017(1) that require parties intending to initiate a Commission case to provide written notice of such intent no less than sixty days prior to the case filing date. For reasons stated below, good cause exists to grant this request.

- 1. On March 29, 2018, Company and Cooperative entered into *Addendum No. 2 to Territorial Agreement Between Union Electric Company and Farmers' Electric Cooperative, Inc.* If approved by the Commission, the addendum would amend the parties' existing territorial agreement to allow Cooperative to serve a single customer at a location currently within Company's authorized service area. Company and Cooperative will imminently file an application seeking Commission approval of the addendum.
- 2. Because the addendum required approval of Cooperative's board of directors, which was obtained during its regularly-scheduled March 29, 2018, meeting, prior notice of the parties' intent to file application seeking Commission approval of the addendum was not possible before that date.
- 3. The addendum accommodates the affected customer's desire to expeditiously install a three-phase irrigation pump necessary to serve its farming operations in and around Mooresville, Missouri, and delaying the application seeking Commission approval of the addendum would be harmful to the customer's business interests. Conversely, Company and Cooperative believe granting the requested waiver would not adversely affect any party that may be interested in participating in the Commission proceeding established to consider the application.

WHEREFORE, for the reasons stated above, Company and Cooperative request the Commission grant this request, and issue an order waiving the prefiling notice required by 4 CSR 240-4.017(1).

Respectfully submitted,

/s/ L. Russell Mitten_

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