

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's Tariffs to Increase Its Revenues) File No. ER-2021-0240
for Electric Service.)

**MOTION FOR EXPEDITED CONSIDERATION AND APPROVAL OF
TARIFF SHEETS FILED IN COMPLIANCE WITH
COMMISSION ORDER ON LESS THAN THIRTY DAYS' NOTICE**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), and pursuant to the Commission's December 22, 2021 *Order Approving Stipulations and Agreements* and its February 2, 2022 *Report and Order* in the above-captioned case, and 20 CSR 4240-2.080(14), hereby files its Motion for Expedited Consideration and Approval of Tariff Sheets Filed in Compliance with Commission Order on Less Than Thirty Days' Notice. In support of its Motion, Ameren Missouri states as follows:

1. The above-referenced *Report and Order* authorizes Ameren Missouri to file tariffs sufficient to recover revenues approved in compliance with the *Report and Order* and the stipulations approved by the *Order Approving Stipulations and Agreements. Report and Order*, Ordered ¶ 2.

2. Earlier today, Ameren Missouri caused to be filed with the Commission revised tariff sheets as authorized by the above-referenced orders. Those revised tariff sheets bear an issue date of February 14, 2022, with an effective date thirty days later to comply with 20 CSR 4240-3.160.¹

3. Section 393.140(11) specifies that, unless the Commission orders otherwise, a change shall not be made to any rate filed by an electrical corporation except after thirty days'

¹ Ameren Missouri has complied with this Commission rule by filing the compliance tariffs with a thirty-day effective date, despite Ameren Missouri's belief that thirty days' notice is unnecessary under these circumstances, particularly given the specific provisions of Section 393.140(11) RSMo. (2016), discussed below.

notice to the Commission and publication for thirty days as required by order of the Commission. However, Section 393.140(11) expressly provides that, for good cause shown, the Commission may allow tariff changes without requiring thirty days' notice. Good cause exists to make the Company's compliance tariffs effective on February 28, 2022, because the above-referenced orders approve a \$220 million increase in Ameren Missouri's retail revenue requirement, which indicates that the Commission has already found that Ameren Missouri is presently in a revenue deficiency position. Moreover, the Commission has already authorized the Company to file the tariffs that are filed concurrently with the filing of this Motion. Finally, the effect of the above-referenced orders is that the Commission has now found that just and reasonable rates are the rates reflected in the pending compliance tariffs, rather than the rates reflected in the current rate schedules to be superseded by those compliance tariffs.

4. As provided for in 20 CSR 4240-2.080(14), the Company requests that the Commission approve the compliance tariffs no later than February 23, 2022, and that the Commission's approval order specify that the tariffs shall take effect on February 28, 2022. As noted earlier, the Commission has good cause to do so. Furthermore, the Company states that by doing so, the Commission will avoid the harm that would be caused by failing to timely allow rates determined to have been just and reasonable to take effect as soon as possible. Moreover, there can be no negative effect on anyone – ratepayers or the Company – if the compliance tariffs are approved to be effective February 28, 2022, because this will allow the rates determined by this Commission to be just and reasonable rates to in fact be charged for the electric service provided by the Company and will allow the new rates to take effect on the operation of law date for this case, as agreed upon in the approved stipulations and agreements.

5. This Motion was filed as soon as it could have been under the circumstances given the necessity of preparing the required tariff sheets in accordance with the *Report and Order* issued twelve days ago on February 2, 2022.

WHEREFORE, for the foregoing reasons and for good cause shown, Ameren Missouri respectfully requests that the Commission grant this Motion for Expedited Consideration and Approval of Tariff Sheets Filed in Compliance with Commission Order on Less Than Thirty Days' Notice, approve the tariff sheets Ameren Missouri has filed to be effective for service rendered on and after February 28, 2022, and for such other and further relief as the Commission deems appropriate under the circumstances.

Respectfully submitted,

/s/ James B. Lowery
James B. Lowery, Mo. Bar #40503
JBL Law, LLC
3406 Whitney Ct.
Columbia, MO 65203-6734
(573) 476-0050 (phone)
lowery@jblaw.com

/s/ Wendy K. Tatro
Wendy K. Tatro, #60261
Director & Assistant General Counsel
Ameren Missouri
1901 Chouteau Avenue, MC 1310
St. Louis, MO 63103
(314) 554-3484 (phone)
(314) 554-4014 (fax)
AmerenMOService@ameren.com
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 of this case on this 14th day of February, 2022.

James B. Lowery
James B. Lowery