

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

In the Matter of the Request of Union)	
Electric Company, d/b/a Ameren Missouri,)	
For an Order Granting a Variance from)	File No. EE-2018-0238
4 CSR 240-13.020(7) Regarding Payment)	
Posting Requirements.)	

REPLY TO COMMISSION STAFF AND OFFICE OF PUBLIC COUNSEL

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and pursuant to the Missouri Public Service Commission's (“Commission”) *Order Directing Filing* issued April 6, 2018, submits its reply to *The Office of the Public Counsel's Response Opposing Union Electric Company's Application ("OPC Response")* filed on March 19, 2018, and the *Staff Recommendation* filed on March 23, 2018. In support of its request, Ameren Missouri states as follows:

1. On March 5, 2018, and in an effort to resolve issues raised in File No. EC-2018-0113 (the “Complaint”), Ameren Missouri submitted its *Request for Variance* from 4 CSR 240-020(7), allowing the Company to post certain payments to customer accounts within 24 hours of receipt rather than the same calendar day.

2. On March 19, 2018, the Office of Public Counsel ("OPC") submitted the *OPC Response* noting that 4 CSR 240-13.020(7) is silent regarding posting, and that Ameren Missouri does not need relief from the rule.

3. On March 23, 2018, the Commission's Staff ("Staff") submitted the *Staff Recommendation* which noted that Ameren Missouri's recently increased documentation of payment received dates can be used to demonstrate when customer payments are remitted. Staff further stated that recording the payment remittance date negates the need for a variance.

4. Ameren Missouri had requested the variance based on the *Staff Memorandum* previously submitted in the Complaint case in an abundance of caution. If the parties believe no variance is needed, and the Commission agrees, the Company will accept that consensus and will withdraw the variance request.

WHEREFORE, for the reasons stated above, Ameren Missouri respectfully requests that the Commission take the Company's response under consideration.

Respectfully submitted,

/s/ Paula N. Johnson

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Response have been transmitted electronically to all counsel of record this 16th day of April, 2018.

/s/ Paula N. Johnson