

**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,)
for an Order Granting a Variance from) File No. GE-2017-0164
4 CSR 240-10.030(19) to revise its Sample)
Meter Testing Plan.)

RESPONSE TO STAFF RECOMMENDATION

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 Establishing Time to Respond to Staff's Recommendation* ("Order") issued March 22, 2017, submits its response to the recommendations filed that same day by the Commission's Staff ("Staff"). In support of its request, Ameren Missouri states as follows:

1. On December 1, 2016, Ameren Missouri filed its *Application and Request for Variance* ("Application") asking for waivers from 4 CSR 240-10.030(19) necessary to revise its Sample Meter Testing Plan for natural gas meters that had been in place in its current form for nearly twenty (20) years.

2. On March 22, 2017, Staff submitted its *Staff Recommendation* together with a *Staff Recommendation Memorandum*, suggesting that the Commission issue an order granting Ameren Missouri the requested modifications to its existing variance subject to certain specific conditions, and also directing the Company to file a revised tariff sheet reflecting the described modifications within thirty (30) days. Staff specifically recommended that Ameren Missouri's variance be subject to the following conditions:

- 1) Ameren will notify Staff once the processes for customer offers and courtesy safety inspections, outlined in Conditions 2 and 3 below, are developed (with an anticipated start date in May 2017);

- 2) For gas meters in the sample meter testing plan, if a meter location has had neither a turn-on or a meter test performed in the previous thirty (30) years, Ameren will send the customer an offer of a courtesy safety inspection as described in Condition 3. [It is suggested that these offers be sent early in the non-heating season, so that any resulting courtesy safety inspections can be scheduled during the non-heating season];
- 3) If the customer accepts the offer made under Condition 2, Ameren will perform a visual inspection under 4 CSR 240-40.030(12)(S)1.B. and a gas leak check of the accessible fuel line using gas detection equipment; and
- 4) Ameren will revise P.S.C Mo. No. 23rd Revised Sheet No. 54, VII, F. Meter Testing to add “as amended by Case No. GE-2017-0164” directly following Case No. GO-98-25 as stated in its approved tariff sheet. [Footnote omitted].

Staff Recommendation Memorandum, p. 2.

3. Also on March 22, 2017, the Commission issued its *Order* allowing any party wishing to respond to the *Staff Recommendation* to submit that response by March 30, 2017.¹

4. Ameren Missouri appreciates Staff’s efforts in its review of the variance request, and has likewise reviewed Staff’s recommended conditions. The Company will accept Staff’s conditions upon issuance of a Commission order and will abide by them.

WHEREFORE, Ameren Missouri respectfully requests that the Commission approve and grant the requested variance, as conditioned by the *Staff Recommendation*.

¹ On March 29, 2016, the Office of the Public Counsel (“OPC”) filed a pleading titled *OPC Response to Staff Recommendation* (“*OPC Response*”). While it did not oppose Ameren Missouri’s request for a variance, the OPC noted that it “would like to have an additional opportunity to discuss this issue with Ameren [Missouri] and the Commission’s Staff.” *OPC Response* p. 2. Accordingly, the OPC asked for additional time to indicate whether it objected to Ameren Missouri’s *Application*. Ameren Missouri is happy to discuss this matter with the OPC and to provide additional information to hopefully bring this matter to a resolution. The Company takes no other position on the *OPC Response* at this time, and reserves the right to address the pleading during any applicable response time, whether set by Commission rule or further order, if necessary.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ Paula N. Johnson

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 30th day of March, 2017, to Staff General Counsel and the Office of the Public Counsel.

/s/ Paula N. Johnson