

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

In the Matter of Ameren Missouri's 2017 Utility Resource Filing Pursuant to 4 CSR 240 – Chapter 22) File No. EO-2018-0038

REQUEST FOR WAIVER OF 60-DAY REQUIREMENT

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

1. 4 CSR 240-22.080(1) requires electrical corporations subject to the Commission's jurisdiction to make triennial compliance filings under Chapter 22 (Electric Utility Resource Planning) of the Missouri Public Service Commission's ("Commission") rules. Ameren Missouri's triennial integrated resource planning ("IRP") compliance filing is due October 1, 2017. Accordingly, on August 1, 2017, the Company submitted its Notice of Case Filing ("Notice"), stating that because October 1 falls on a Sunday, it would make its IRP compliance filing on October 2, 2017. Ameren Missouri noted in that filing that the issues likely to be before the Commission "are those outlined in 4 CSR 240-22.080(16), which specifies the requirements for the Commission's order that will resolve the triennial compliance filing docket."

2. Subsequently, the Company elected to submit its IRP filing on September 25, 2017, rather than October 2, 2017, or seven days earlier than the noticed submission date. The issues likely to be before the Commission remain unchanged; only the time frame for the submission of the IRP compliance filing has been amended.

3. Pursuant to 4 CSR 240-4.017(1)(D), waivers of the 60-day notice requirement may be granted for good cause shown. The rule further provides that good cause includes "a verified declaration from the filing party that it has had no communication with the office of the

commission within the prior one hundred fifty (150) days regarding any substantive issue likely to be in the case..."¹

4. As indicated in the verification attached as Exhibit A, Ameren Missouri has had no communications with the office of the Commission (as defined by 4 CSR 240-4.015(10)) regarding any substantive issue likely to be in this case during the preceding 150 days. Accordingly, 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 Request for Waiver of 60-Day Requirement, and requests 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/ James B. Lowery

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

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Request For Waiver of 60-Day Requirement was served on the Staff of the Missouri Public Service Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 25th day of September, 2017.

/s/ Paula N. Johnson
Paula N. Johnson

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) File No. EO-2018-0038

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

1. My name is Matt Michels. I work in the City of St. Louis, Missouri, and I am employed by Ameren Services Company as the Director of Corporate Analysis. I oversee the development of Union Electric Company d/b/a Ameren Missouri's integrated resource plan, which is filed with the Missouri Public Service Commission.

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.


Matt Michels

Subscribed and sworn to before me this 22nd day of September, 2017.

Men G. Best
Notary Public

My commission expires:

