

**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  
COMPLIANCE TARIFF SHEETS TO IMPLEMENT CRITICAL NEEDS PROGRAM  
PILOT ON LESS THAN THIRTY DAYS' NOTICE**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), and pursuant to 20 CSR 4240-2.080(14), hereby files its Motion for Expedited Consideration and Approval of Compliance Tariff Sheets to Implement Critical Needs Program Pilot on Less Than Thirty Days' Notice. In support of its Motion, Ameren Missouri states as follows:

1. On December 22, 2021, the Missouri Public Service Commission ("Commission") issued its *Order Approving Stipulations and Agreements* and issued its *Report and Order* on February 2, 2022. Ameren Missouri's compliance tariffs became effective on February 28, 2022. The compliance tariffs, however, did not include the agreed upon Critical Needs Program Pilot since further engagement with health care professionals, existing community information exchange networks, energy assistance agencies, and utilities was needed to develop a statewide framework.

2. Under paragraph 21 of the Unanimous Stipulation and Agreement, the Signatories agreed to work together and meet at least once per quarter to develop a program accomplishing the goal of the critical needs program generally described in the Office of Public Counsel ("OPC") witness Marke's direct testimony in this docket. As a result of the quarterly meetings, Ameren Missouri is filing its compliance tariff for its Critical Needs Program Pilot consistent with OPC witness Marke's testimony.

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' 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 Critical Needs Program Pilot tariff effective on March 9, 2023, because the above-referenced order approved the Stipulation and Agreement outlining Ameren Missouri's Critical Needs Program and the tariff reflects the collaborative efforts of the signatories. Finally, Commission Staff and OPC, stakeholders in the development of the tariffs, have represented to counsel that they do not object to the expedited request.

4. As provided for in 20 CSR 4240-2.080(14), the Company requests that the Commission approve the compliance tariffs no later than March 9, 2023, and that the Commission's approval order specify that the tariffs shall take effect on March 9, 2023. As noted earlier, the Commission has good cause to do so since customers will benefit from the Critical Needs Program Pilot. Moreover, there can be no negative effect on anyone – customer or the Company – if the tariff is approved to be effective March 9, 2023, because this will allow the Critical Needs Program Pilot to take effect as agreed upon in the approved Stipulation and Agreement.

5. This Motion was filed as soon as it could have been under the circumstances given the necessity of collaborative meetings, unanimous agreement on the Critical Needs Program Pilot framework, and preparing the required tariff sheets.

**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 Compliance Tariff Sheets to Implement Critical Needs Program Pilot on Less Than

Thirty Days' Notice, approve the tariff sheets Ameren Missouri has filed to be effective March 9, 2023, and for such other and further relief as the Commission deems appropriate under the circumstances.

Respectfully submitted,

/s/ Jermaine Grubbs

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**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 24<sup>th</sup> day of February, 2023.

*/s/ Jermaine Grubbs*

Jermaine Grubbs