

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

In the Matter of Ameren Missouri's)	
Application for Authorization to)	File No. ET-2014-0085
Suspend Payment of Solar Rebates.)	Tariff No. YE-2014-0235

**REQUEST FOR VARIANCES
AND REQUEST FOR EXPEDITED TREATMENT**

COMES NOW Union Electric Company, d/b/a Ameren Missouri (Ameren Missouri or the Company), and for its request for variances from certain portions of the Missouri Public Service Commission's (Commission) rules related to the Renewable Energy Standard (RES), states as follows:

1. On October 11, 2013, Ameren Missouri filed an application to cease paying solar rebates and an accompanying tariff sheet under the RES and the Commission's RES rules in File No. ET-2014-0085. After that filing was made, the parties reached an agreement to resolve all issues in the case. The Non-Unanimous Stipulation and Agreement (Stipulation) was filed on November 8, 2013.¹ The Commission issued an order approving the Stipulation on November 13, 2013.

2. The Stipulation required Ameren Missouri to withdraw the pending tariff sheet which had been filed with the original application. That tariff sheet was withdrawn on November 15, 2013.

3. Concurrent with this pleading, Ameren Missouri is filing the necessary tariff sheets to implement the rebate pool requirement of the Stipulation. A copy of the tariff is also attached to this pleading.

4. Reducing uncertainty for Ameren Missouri's customers who are interested in installing solar panels at their residences or places of business is an important goal for all of the

¹ The parties who were not signatories to the Stipulation filed a pleading indicating that they did not oppose the agreement.

signatory parties to the Stipulation. In order to achieve that goal, one step Ameren Missouri believes is necessary is to implement a reservation style system based upon the timing of receipt of completed applications. In order to implement this system, a variance from the Commission's RES rules is necessary.

5. Specifically, Ameren Missouri requests a variance from 4 CSR 240-20.100(4)(K). This section governs the payment of the solar rebates and requires Ameren Missouri to offer a solar rebate within thirty days of the application date and to pay the solar rebate within thirty days of verification that the solar system is fully operational.

6. Under certain circumstances, this regulation would be inconsistent with a reservation system, because the obligation for the utility to pay the solar rebate is triggered by the installation date rather than the application date. Further, this method for paying rebates does not provide customers with certainty of whether they will receive a rebate payment. Ameren Missouri believes this uncertainty should be lessened and that it can be lessened by moving to a reservation system.

7. Instead of strictly following the process set forth in 4 CSR 240-20.100(4)(K), Ameren Missouri proposes to create a reservation system that "reserves" the rebate eligibility for customers, based upon the date of receipt of a completed application that is ultimately approved by Ameren Missouri, provided the customer installs the system consistent with the design that was submitted and approved and also satisfies the expiration timeframes required by 4 CSR 240-20.100 and 4 CSR 240-20.065. If a customer does not satisfy those timeframes, then that customer's rebate commitment will expire and will be removed from the queue and the next person in the queue (who has not previously received a rebate commitment) will be notified. Ameren Missouri would still pay the solar rebate within thirty days after the solar system becomes operational for those customers with a rebate commitment. To the extent that

customers complete the installation of their solar systems even though they did not receive a rebate commitment and are in the queue, their payments will be within 30 days of receiving their rebate commitments. A rebate commitment to a customer guarantees the availability of a rebate. However, the amount of the rebate payment depends upon when the system becomes operational.

8. This variance request has been discussed with the Office of the Public Counsel, Brightergy and MOSEIA. The attorney for each has indicated to Ameren Missouri's attorneys that they do not oppose this requested variance. The Staff has not indicated that it has any concerns with this request, however, due to Staff's schedule, they have not completed their review. Staff anticipates making a filing sometime next week.

9. Finally, Ameren Missouri requests the Commission grant this request expedited treatment and that it issue an order that is effective no later than December 22, 2013. This would mean that the Commission would likely address this request at its December 12, 2013, Agenda meeting. This request is filed as soon as possible after Ameren Missouri had discussed the tariff and this variance request with the parties to File No. ET-2014-0085. No parties will be harmed by granting expedited treatment and granting it will allow the Company to more immediately begin to implement a reservation system for rebates, aiding the Company as well as its customers who are aided by knowing the rebate status for their solar panels on their homes or businesses.

WHEREFORE, Ameren Missouri requests the Missouri Public Service Commission approve the variance request so that it is effective no later than December 22, 2013, as set forth above.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a Ameren Missouri

/s/ Wendy K. Tatro

Wendy K. Tatro, #60261

Corporate Counsel

Thomas M. Byrne, #33340

Director & Assistant General Counsel

1901 Chouteau Avenue, MC 1310

P.O. Box 66149

St. Louis, MO 63166-6149

(314) 554-3484 (phone)

(314) 554-4014 (facsimile)

amerenmoservice@ameren.com

James B. Lowery MBN #40503

Smith Lewis, LLP

111 S. Ninth Street, Ste. 200

P.O. Box 918

Columbia, MO 65205

Telephone: (573) 443-3141

Fax: (573) 442-6686

Email: lowery@smithlewis.com

**ATTORNEYS FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

Dated: November 26, 2013

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all parties of record to this case on this 26th day of November, 2013.

Wendy K. Tatro

Wendy K. Tatro