

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

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| In the Matter of Ameren Missouri's Request |) | |
| for Variance from Portions of |) | File No. ET-2013- |
| 4 CSR 240-20.065. |) | |

REQUEST FOR APPROVAL OF TARIFF AND FOR VARIANCE

COMES NOW, Union Electric Company, d/b/a Ameren Missouri (Ameren Missouri or the Company), and for its request to approve tariff and grant Ameren Missouri a variance from certain portions of the Commission's Net Metering rules, found in 4 CSR 240-20.065, states as follows:

1. The Missouri Public Service Commission (Commission) recently revised its net metering rules and those revised rules became effective August 30, 2012.
2. Concurrent with this filing, Ameren Missouri is submitting a modified net metering tariff to add in the language required by the Commission's new rules. The Company is requesting several variances to the language required by the rule, specifically to the language of the Interconnection Application/Agreement (contract) which is contained within the rules. In each case, the purpose of each variance is to provide additional clarifying language in the Net Metering Application/Agreement to reduce customer confusion, expedite processing or to better reflect steps required to implement net metering for participating Ameren Missouri customers. The Company is attaching a copy of the revised tariff sheets, including the contract, as Exhibit A to this pleading. This Exhibit shows where each of the variances is requested below and labels them "Variance Request #" to allow the Commission (and others) to more easily identify the changes being requested.

A. Variance Request found on Multiple Sheets of Revised Tariff.

3. Variance Request # 1. The rule calls for the insertion of the utility name in multiple locations throughout the contract. Ameren Missouri requests that the legal name (utility name) be required only the first time in order to identify the utility as Ameren Missouri and that it be allowed to use “Company” in place of utility name throughout the rest of the contract. This is common drafting practice and means that a change in the Company’s operational name would only require a single revision to the tariff instead having to make many revisions and also benefits customers by making the document easier to read.

B. Variance Requests found on Sheet 13 of Revised Tariff.

4. Variance Request # 2. On the fourth paragraph of the first page of the contract, the Company requests the addition of the following phrase at the end of the second sentence of this paragraph, “...and, if a local Authority Housing Jurisdiction (AHJ) is applicable, the permit number and approval certification.” Net metering issues are receiving more attention from various code authorities. To the extent that a code authority has determined that permitting/certification are required, Ameren Missouri needs to collect the permit information so that it does not improperly set meters that have not met the requirements of the AHJ. Variances #6 and #11 are being requested for the same reason.

5. Variance Request # 3. Also on the first page of the contract, under the heading “For Customers Who Are Installing Solar Systems,” the Company requests that it be allowed to add a sentence which reads, “Please refer to Company’s Rider SR – Solar Rebate for additional details and requirements.” Although the application for a solar

rebate has been made a part of the Net Metering Application/Agreement, this sentence adds clarity and helps ensure customers are alerted that there is a separate tariff for the solar rebate.

C. Variance Requests found on Sheet 14 of Revised Tariff.

6. Variance Request # 4. Section A requests information about the Customer-Generator. Ameren Missouri requests the addition of a line to identify the Electric Account Holder Contact Person. The Company has encountered situations where sending addressed mail to a company without a contact name might result in the mail not being delivered to the correct person within the customer's organization. This addition will prevent this situation from occurring.

7. Variance Request # 5. The Company requests permission to place an additional sentence into this portion of the tariff. The sentence reads, "If disconnect switch is greater than 10 feet from electric service meter, describe why an alternate location is being requested." It is Ameren Missouri's practice to require the disconnect switch to be in the vicinity to the meter for electric service. Exceptions to the location requirement should be granted if there is reason based upon good engineering practice and to ensure an undue burden is not imposed upon a customer. Without this addition, the Company would have to contact the customer to gather this information, something that takes time and can slow down the processing of the application.

D. Variance Requests found on Sheet 15 of Revised Tariff.

8. Variance Request # 6. The Company requests the deletion of the line in Section C. Installation Information/Hardware and Installation Compliance. The line to be

deleted reads, “Person or Agency Who Will Inspect/Certify Installation. This language is no longer necessary, given Variance requests #2 and #11.

9. Variance Request # 7. Also in Section C, the Company would add the language “...located within the vicinity of the Customer-Generator’s electric service meter (except in cases where Company has approved an alternative location.)” This variance acknowledges both the Company’s standard practice and the reality that exceptions to the general rule will occur and so it is a necessary change to reflect these operational realities.

10. Variance Request # 8. In Section C, the Company requests the ability to add a line under the signature line for the installer to print their name. At times, the signatures are illegible. Adding a printed name will improve the likelihood that the installers name can be read.

E. Variance Request found on Sheet 16 of Revised Tariff.

11. Variance Request # 9. The variance pertains to Section D.2) Liability and is a request to correct what appears to be an oversight in the contract language. 4 CSR 240-20.065(5)(B) requires any contract to include the language, “Absent clear and convincing evidence of fault on the part of Company, Company cannot be held liable for any action or cause of action relating to any damages to property or person caused by the generation unit of a Customer-Generator or the interconnection thereof pursuant to section 386.890.11, RSMo Supp. 2008.” This language does not appear in the contract contained in the rules and clearly it was intended that it should.

F. Variance Requests found on Sheet 17 of Revised Tariff.

12. Variance Request # 10. In Section D.5) Energy Pricing and Billing of the Contract, the Company requests authority to replace “customer charges” with “minimum bill as specified by Customer-Generators selected rate.” The “Net Metering & Easy Connection Act” (386.890 RSMo) states in subsection 3, “A retail electric supplier shall: ... (2) Offer to the customer-generator a tariff or contract that is identical in electrical energy rates, rate structure, and monthly charges to the contract or tariff that the customer would be assigned if the customer were not an eligible customer-generator...” In formulating this rule, it appears that the scenario of a customer that is on a rate with a minimum demand charge was overlooked. This language change provides for that possibility.

G. Variance Request found on Sheet 19 of Revised Tariff.

13. Variance Request # 11. The Company requests the ability to add the language “If a local Authority Housing Jurisdiction (AHJ) governs permitting/inspection of project: Provide Permit Number _____.” This is the same request as Variance Requests # 2 and # 6.

WHEREFORE, Ameren Missouri requests the Missouri Public Service Commission approve the tariff as filed and approve the waivers requested for portions of 4 CSR 240-20.065.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ Wendy K. Tatro

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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 29th day of October, 2012, to Staff General Counsel and the Office of the Public Counsel.

/s/ Wendy K. Tatro