

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

In the Matter of Ameren Missouri's)
Solar Rebate Offer.) File No.
)

APPLICATION FOR VARIANCE

COMES NOW Union Electric Company, d/b/a Ameren Missouri (Ameren Missouri or the Company), and pursuant to 4 CSR 240-20.100(4), files its Application for Variance for the purpose of allowing inspection by an Authority Having Jurisdiction (AHJ) to occur after June 30, 2014, states as follows:

1. In order for customers to receive the solar rebate rate of \$2.00 per watt, the statute (Chapter 393.1025.3) requires the customer's system to be operational by June 30, 2014. The term operational is not defined in the statute.

2. Missouri Public Service Commission (Commission) regulations require the Company to provide a solar rebate payment to qualified retail account holders within thirty (30) days of verification that the solar electric system is fully operational. The regulations define a fully operational system to mean "the purchase and installation on the retail account holder's premises of all major system components of the on-site solar electric system and production of rated electrical generation." (4 CSR 240-20.100(4)(K)). "Production of rated electrical generation" necessarily requires that the Company's bi-directional meter has been installed and that the Company has permitted parallel operation of the customer's solar electric system with the Company's system.

3. One of the requirements, before a system can become operational, is for the AHJ, if there is one, to have completed any required inspection. The closer in time it is to June 30th, the more this item has the potential to slow down a customer's ability to have a system

operational by June 30th. The Company also recognizes that customers likely have little control over when the AHJ does the inspection and that, similar to Ameren Missouri, there may be AHJs facing a large number of these inspections, given the volume of rebate applications currently pending.

4. The Company requests this variance to allow additional time for an AHJ to perform an inspection of the customer's system after June 30 but no later than July 31.

5. This variance request is consistent with the Company's current tariff which provides that a customer will receive the \$2.00 per watt rebate rate if they have satisfied the conditions necessary to become operational by June 30th, but the Company is unable to install a meter on or before June 30th. That tariff was approved by the Commission (tariff YE-2014-0235) on December 12, 2013, and was made effective on December 22, 2013.

6. This proposed change has been discussed with Staff although they have not been able to conduct a complete review or express their opinion of the change.

OTHER INFORMATION

7. Ameren Missouri is a corporation in good standing, duly organized and existing under and by virtue of the laws of the State of Missouri, with its principal office and place of business at One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103. Ameren Missouri has previously filed a Certificate of Corporate Good Standing in File No. EA-2014-0136, which is incorporated by reference. Applicant's Fictitious Name Registration was previously filed with the Commission in File No. EN-2011-0069, which is incorporated by reference.

8. The Applicant is engaged in providing electric and gas utility services in portions of Missouri as a public utility under the jurisdiction of this Commission. Ameren Missouri has

no pending actions or final unsatisfied judgments or decisions against it from any state or federal court or agency within the past three (3) years which involve customer service or rates, other than cases currently pending before the Commission (EC-2012-0050, EC-2013-0491, EC-2013-0521, EC-2013-0524, EC-2014-0034, EC-2014-0130, EC-2014-0133 and EC-2014-0224) and appeals pending in the Western District Court of Appeals (WD75980). Ameren Missouri has no annual reports or assessment fees that are overdue.

9. All correspondence, communications, notices, orders and decisions of the Commission with respect to this matter should be sent to the undersigned counsel.

WHEREFORE, Ameren Missouri requests the Commission grant it a variance from the date by which it is required to provide solar rebate payment to customers under the limited circumstances described above.

Respectfully Submitted,

/s/ Wendy K. Tatro

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