

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

In the Matter of the Application of Union Electric Company    )  
d/b/a Ameren Missouri for an Order Authorizing                )  
the Borrowing of Up to \$800,000,000 Aggregate                )    **File No. EF-2014-0094**  
Principal Amount Under a Long-Term Credit Facility            )

**STAFF RESPONSE TO COMMISSION ORDER**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through undersigned counsel of the Staff Counsel’s Office, and files in File No. EF-2014-0094 *Staff Response To Commission Order*. In support thereof, the Staff states that it can file its recommendation in this matter by December 20, 2013, assuming appropriate discovery.

1. On October 15, 2013, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed an Application for permission and authority, under Sections 393.180 and 393.200 RSMo. 2000, 4 CSR 240-3.120 and 4 CSR 240-2.060 to incur up to \$800,000,000 aggregate principal amount of new borrowings under a long-term credit facility under its 2012 Missouri Credit Agreement.

2. On October 16, 2013, the Missouri Public Service Commission (“Commission”) issued an *Order Directing Staff To File A Pleading Stating When It Will File A Recommendation In This Case*.

3. The Staff has already issued some data requests to Ameren Missouri and as of this date received responses to them. The Staff is trying to send additional data requests to Ameren Missouri this date.

4. Only in Paragraph 18 of its pleading entitled “Application” filed on October 15, 2013 does Ameren Missouri state dates by when it would like the Commission to issue an Order granting relief:

The Company Borrowing Sublimit under the 2012 Agreement expires on November 13, 2013. Ameren Missouri’s FERC short-term debt authorization expires on March 31, 2014. Accordingly, approval of this filing by the Commission by November 13, 2013 would allow the Company to extend its borrowing authority under the facility to November 13, 2017. However, if that short timeframe is problematic so as to not allow for review and approval of this application, Ameren Missouri requests the Commission approve this application so that it is effective no later than March 31, 2014.

5. The Commission has a rule on expedited treatment with which it appears Ameren Missouri did not seek to comply:

4 CSR 240-2.080(14):

Any request for expedited treatment shall include the words “Motion for Expedited Treatment” in the title of the pleading. The pleading shall also set out with particularity the following:

- (A) The date by which the party desires the commission to act;
- (B) The harm that will be avoided, or the benefit that will accrue, including a statement of the negative effect, or that there will be no negative effect, on the party’s customers or the general public, if the commission acts by the date desired by the party; and
- (C) That the pleading was filed as soon as it could have been or an explanation why it was not.

**WHEREFORE** the Staff in response to the Commission’s *Order Directing Staff To File A Pleading Stating When It Will File A Recommendation In This Case* files the instant *Staff Response To Commission Order* stating that it can file its recommendation in this matter by December 20, 2013, assuming appropriate discovery.

Respectfully submitted,

**/s/ Steven Dottheim**

Steven Dottheim

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing *Staff Response To Commission Order* have been transmitted electronically to all counsel of record this 25<sup>th</sup> day of October 2013.

**/s/ Steven Dottheim**