BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Tariff Filings of Union Electric Company, d/b/a Ameren Missouri, to Increase Its Revenues for Retail Electric Service.

Case No. ER-2014-0258

REQUEST FOR PERMISSION TO FILE STANDBY TARIFF IN AMEREN MISSOURI'S NEXT RATE CASE

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), and, for its request, states as follows:

1. On March 5, 2014, a Nonunanimous Stipulation and Agreement Regarding Supplemental Service Issues ("Stipulation") was filed in this case. The Stipulation was signed by Ameren Missouri, the Staff of the Missouri Public Service Commission ("Staff"), the Missouri Industrial Energy Consumers ("MIEC") and the Missouri Department of Economic Development ("DE"). Receiving no opposition, the Stipulation was approved by the Missouri Public Service Commission ("Commission") on March 19, 2015.

2. The Stipulation required that the signatories participate in at least two workshops and work together to develop a Standby Tariff.

3. Workshops were held on July 29, 2015, October 20, 2015, November 10, 2015 and January 21, 2016. Participants in the workshops included the signatories to the Stipulation, but also included many other interested groups, including: Midwest Cogeneration Association; Environmental Law Counsel, P.C.; Renew Missouri, Missouri Office of Administration; Lambert-St. Louis International Airport; Veolia Energy North America; University of Illinois at Chicago – Energy Resource Center; Washington University; Brightergy; Missouri Energy Initiative; Kansas City Power & Light Company; and Empire District Electric Company. Beyond the workshops, numerous one-on-one conversations were held with various participants. 4. Ameren Missouri believes there is general agreement on the structure of the tariff; however, there is not complete agreement on the rates that should be charged for the various components of Standby Service.

5. To the best of Ameren Missouri's knowledge, there is no customer waiting to take service under this tariff.

6. On January 11, 2016, Ameren Missouri filed a 60-day notice that it may file a rate case. Given that development, the signatories to the Stipulation discussed filing the Standby Tariff in direct testimony as a part of Ameren Missouri's next rate case rather than filing it outside of a rate case.

7. Ameren Missouri believes this approach is reasonable, does not disadvantage any group, and asks the Commission to order the filing of the Standby Tariff in Ameren Missouri's next rate case.

8. Staff, MIEC and DE have each indicated that they do not object to this request.

WHEREFORE, Ameren Missouri respectfully requests that the Commission issue an Order granting Ameren Missouri's request to file the Standby Tariff in its next rate case and for such other and further relief as it deems necessary.

Respectfully submitted,

UNION ELECTRIC COMPANY, d/b/a Ameren Missouri

<u>/s/ Wendy K. Tatro</u> Wendy K. Tatro, Bar #60261 Director and Assistant General Counsel 1901 Chouteau Avenue St. Louis, MO 63103 (314) 554-3484 (phone) (314) 554-4014 (fax) AmerenMOService@ameren.com

2

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been handdelivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 29th day of January, 2016, to counsel for all parties on the Commission's service list in this case.

/s/ Wendy K Tatro