

**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 a Variance)
From the Provisions of Commission Rule 4 CSR)
240-14 to Meet Unregulated Competition in a)
Subdivision in Cole County, Missouri)
File No. EE-2013-0511

**STAFF’S RECOMMENDATION TO APPROVE TARIFF SHEET
AS IN COMPLIANCE WITH COMMISSION ORDER**

COMES NOW the Staff (“Staff”) of the Missouri Public Service Commission (“Commission”), by and through counsel, and for its recommendation to approve the compliance tariff sheet filed on July 2, 2013, by Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) in this matter respectfully states:

1. On June 26, 2013, the Commission issued its *Order Granting Variance* in this matter. The order granted Ameren Missouri’s request for a variance from the Commission’s rules regarding promotional practices¹ and from the Company’s tariff rule² regarding the cost of underground service. The variance allows Ameren Missouri to waive certain charges to the developers of Markway Meadows subdivision in Cole County, Missouri, pursuant to the Company’s tariff rule regarding unregulated competition.³

2. On July 2, Ameren Missouri filed a revised tariff sheet⁴ to reflect the order, along with a motion requesting that the Commission approve the tariff sheet to take

¹ 4 CSR 240-14.
² MO P.S.C. Schedule No. 5, 5th Revised Sheet No. 152, Section III.K.3(a).
³ MO P.S.C. Schedule No. 5, Original Sheet No. 202.
⁴ MO P.S.C. Schedule No. 6, 1st Revised Sheet No. 161.1 Cancelling Original Sheet No. 161.1.

effect on less than 30 days' notice, pursuant to § 393.140(11) RSMo.⁵ The tariff sheet contains a list of the areas, individuals and/or subdivisions that have received Commission-approved unregulated competition waivers; the sheet filed July 2 adds "Markway Meadows Subdivision in Cole County" to the list and refers to this file number (EE-2013-0511).

3. The tariff sheet bears an effective date of August 1, 2013, but Ameren Missouri requests the Commission approve the tariff sheet so that it takes effect on July 5, 2013. In support of its motion, Ameren Missouri states that, pursuant to § 393.140(11), good cause exists to make the Company's compliance tariff sheet effective on less than 30 days' notice because the Commission has already granted the Company's request for the variance and expedited treatment, and because the tariff sheet simply memorializes the existence of the variance, as contemplated by Ameren Missouri's tariff.

4. Staff has reviewed the tariff sheet and finds that it complies with the Commission's June 26 order. Staff's *Memorandum*, attached hereto as Appendix A and incorporated herein by reference, recommends the Commission approve Ameren Missouri's request to approve the tariff sheet so that it takes effect on July 5, 2013.

5. The Staff has verified that Ameren Missouri has filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

⁵ "Unless the commission otherwise orders, no change shall be made in any rate or charge... except after thirty days' notice to the commission and publication for thirty days... The commission for good cause shown may allow changes without requiring thirty days' notice under such conditions as it may prescribe."

WHEREFORE, Staff recommends the Commission approve the compliance tariff sheet filed by Ameren Missouri on July 2, 2013, to become effective July 5, 2013:

P.S.C. MO. No. 6

1st Revised SHEET No. 161.1 Cancelling Original SHEET No. 161.1

Respectfully Submitted,

/s/ John D. Borgmeyer

John D. Borgmeyer

Legal Counsel

Missouri Bar No. 61992

Attorney for the Staff of the

Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 3rd day of July, 2013.

/s/ John D. Borgmeyer

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
Case No. EE-2013-0511, File No. YE-2014-0003, Union Electric Company d/b/a
Ameren Missouri

FROM: Tom Imhoff, Energy Unit - Tariffs/Rate Design

/s/ Thomas M. Imhoff 07/03/13 /s/ John D. Borgmeyer 07/03/13
Energy Unit/Date Staff Counsel's Office/Date

SUBJECT: Staff Recommendation On Ameren Missouri's Tariff Sheet Filed to Comply with the
Commission's Order Granting Variance And Request For Expedited Treatment

DATE: July 3, 2013

On June 26, 2013, the Missouri Public Service Commission ("Commission") issued its Order Granting Variance ("Order") in Case No. EE-2013-0511, the Union Electric Company d/b/a Ameren Missouri ("Ameren" or "Company") variance request from Commission Rule CSR 240-14 to meet unregulated competition in a subdivision in Cole county. This Order approved the variance and Ameren's request for expedited treatment.

The Company filed this tariff sheet on July 2, 2013, to comply with the Order.

In its letter of transmittal accompanying the July 2, 2013 compliance filing, Ameren requested expedited treatment to reflect an effective date of July 5, 2013, which would be less than the standard 30-day period, but which complies with the Commission Order granting the variance.

The Commission's Energy Unit - Tariffs/Rate Design Staff ("Staff") has reviewed the tariff sheet as filed by Ameren on July 2, 2013, and is of the opinion that this sheet is in compliance with the Commission's Order. Staff is also of the opinion that good cause for approval of these tariff sheets on less than thirty days notice is demonstrated by the Commission's Order approving the Variance that requested a July 5, 2013 effective date. Therefore, Staff recommends the following tariff sheet filed on July 2, 2013, be approved:

P.S.C. MO. No. 6

1st Revised SHEET No. 161.1 Cancelling Original SHEET No. 161.1

The Staff has verified that Ameren has filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

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

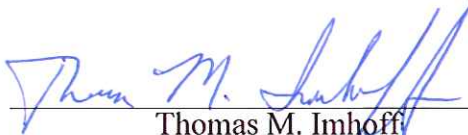
In the Matter of the Application of)
 Union Electric Company d/b/a)
 Ameren Missouri for a Variance)
 from the Provisions of Commission)
 Rule 4 CSR 240-14 to Meet)
 Unregulated Competition in a)
 Subdivision in Cole County,)
 Missouri)

File No. EE-2013-0511

AFFIDAVIT OF THOMAS M. IMHOFF

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

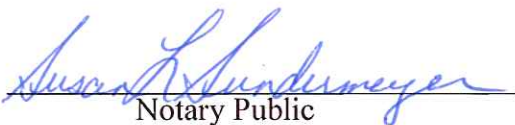
Thomas M. Imhoff, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



 Thomas M. Imhoff

Subscribed and sworn to before me this 3rd day of July, 2013.

SUSAN L. SUNDERMEYER
 Notary Public - Notary Seal
 State of Missouri
 Commissioned for Callaway County
 My Commission Expires: October 03, 2014
 Commission Number: 10942086



 Notary Public