

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

In the Matter of Union Electric Company d/b/a )	
Ameren Missouri for a Variance from )	<b><u>File No. EE-2020-0290</u></b>
Portions of Its Tariffs Related to Reconnection )	
And Late Payment Fees )	

**STAFF RECOMMENDATION**

**COMES NOW** Staff of the Missouri Public Service Commission and for its Recommendation in this matter respectfully states as follows:

1. On March 17, 2020, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) filed a request for variance or waiver from the 60-day notice requirement of 20 CSR 4240-4.017 and from provisions of its tariffs related to the collection of reconnection and late payment fees found in General Rules and Regulations, Section V. Billing Practices, J. Late Payment Charge, Tariff Sheet No. 136 and General Rules and Regulations, Section VII. Disconnection and Reconnection of Service, I. Reconnection of Service, Tariff Sheet No. 145, to help assuage the financial hardships felt by its customers during the COVID-19 pandemic.

2. The Company states in its filing that it is asking that the foregoing tariff provisions be waived indefinitely, and states that it will continue to monitor the pandemic and as it becomes apparent that the outbreak is waning and normal routines may be reinstated it will examine the reinstatement of these fees; Ameren Missouri states that it will provide at least 15 days’ notice to affected customers before the fees are reinstated. Staff notes that it would sincerely hope that Ameren Missouri would file a notice in this docket notifying the Commission, Staff, and the Office of the Public Counsel at or before the time that it notifies customers that the fees are being reinstated. Staff would also

suggest that instead of only sending notice to affected customers Ameren Missouri issue a press release advising that the fees are being reinstated.

3. Staff would note that the Company's tariffs allow the Company to seek a waiver from the Commission from its tariffs for good cause shown. Due to the highly unusual situation presented by the current COVID-19 pandemic, Staff believes the Company has shown good cause for a waiver of the above tariff provisions in this circumstance and recommends the Commission approve the Company's request.

**WHEREFORE**, Staff recommends the Commission issue an order approving Ameren Missouri's request for variance or waiver of those portions of its tariffs related to the collection of reconnection and late payment fees set forth in its request, as well as the 60-day notice requirement of 20 CSR 4240-4.017.

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

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Attorney for the Staff of the  
Missouri Public Service  
Commission

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 17th day of March, 2020.

**/s/ Jeffrey A. Keevil**