

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

In the Matter of a Determination of Special)
Contemporary Resource Planning Issues)
to be Addressed by Ameren Missouri in its)
Next Triennial Compliance Filing or Next)
Annual Update Report)

File No. EE-2018-0040

**STAFF'S RESPONSE TO AMEREN MISSOURI'S REQUEST FOR
WAIVERS AND REQUEST FOR EXPEDITED TREATMENT**

COMES NOW the Staff of the Missouri Public Service Commission, by and through Staff Counsel's Office, in response to the Commission's August 3, 2017 *Notice And Order Directing Filings*. In response thereto, the Staff states as follows:

1. On August 2, 2017, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed Ameren Missouri's *Request For Waivers And Request For Expedited Treatment* ("*Request For Waivers*"). Ameren Missouri seeks three (3) waivers from the Commission's rules for good cause shown: (i) a waiver from 4 CSR 240-4.017(1) (60-day notice pleading), (ii) a waiver from 4 CSR 240-22.080(3) (electric utility resource planning – annual updates), and (iii) a waiver from 4 CSR 240-22.080(4) (electric utility resource planning – special contemporary issues). Ameren Missouri also requests expedited treatment so that the waivers may be granted on or before September 1, 2017. 4 CSR 240-2.080(14).

2. The Commission in its August 3, 2017 *Notice and Order* directed that the Staff shall file a recommendation and any other response to the *Request For Waivers* no later than April 16, 2017.

3. Ameren Missouri requested a waiver from the 60-day notice requirement of 4 CSR 240-4.017(1) for good cause shown and attached the verified statement of Matt Michels, Director Corporate Analysis, Ameren Services Company. Ameren Missouri noted in its *Request For Waivers* that in File No. EE-2015-0316 on July 22, 2015, the Commission issued an Order Granting Variance for good cause shown in which it granted a waiver/variance to Ameren Missouri under 4 CSR 240-22.080(13) to file its next Chapter 22 comprehensive electric utility resource planning analysis on September 29, 2017 rather than on April 1, 2017. The Staff filed a *Response To Ameren Missouri's Request For Variance From 4 CSR 240-22.080(1)(C)* on July 2, 2015, and stated it had no objection to Ameren Missouri's request for good cause shown.

4. 4 CSR 240-22.080(3) states in part:

(3) Beginning in 2012, **on or about April 1 of every year in which the utility is not required to submit a triennial compliance filing, each electric utility shall host an annual update workshop** with the stakeholder group. . . .

(A) The **purpose of the annual update workshop** is to ensure that members of the stakeholder group have the opportunity **to provide input and to stay informed regarding the –**

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4. **Analyses and conclusions regarding any special contemporary issues** that may have been identified pursuant to 4 CSR 240-22.080(4);

(B) The utility shall prepare an **annual update report** . . . and shall file the annual update reports with the commission no less than twenty (20) days prior to the annual update workshop. (Emphasis supplied).

Thus, the annual update workshop and special contemporary issues are linked and there is provision in the Commission's electric utility resource planning rule for no annual update workshop when the utility files its triennial compliance filing. As noted by

Ameren Missouri's *Request For Waivers*, 4 CSR 240-22.080(4) contains the schedule for identification of special contemporary issues to be analyzed and documented for an annual update workshop contemporaneous with the triennial compliance filing schedule.

5. 4 CSR 240-22.080(4) states in part:

(4) . . . An order containing a list of special contemporary issues shall be issued by the commission for each utility to analyze and document in its next triennial compliance filing or next annual update report. . . .

The Commission issued in File No. EO-2017-0073 on October 26, 2016, an *Order Establishing Special Contemporary Resource Planning Issues* for Ameren Missouri to analyze and document in its 2017 Triennial Compliance Report which it will file on September 29, 2017.

6. For good cause shown, the Staff has no objection to the Ameren Missouri request for waivers from (i) 4 CSR 240-4.017(1) 60-day notice pleading, (ii) 4 CSR 240-22.080(3) annual update, and (iii) 4 CSR 240-22.080(4) special contemporary issues, and has no objection to the Ameren Missouri request for expedited treatment, pursuant to 4 CSR 240-2.080(14).

WHEREFORE, the Staff states as its response that it has no objection to the August 2, 2017, Ameren Missouri request for waivers for good cause shown from 4 CSR 240-4.017(1), 4 CSR 240-22.080(3), and 4 CSR 240-22.080(4) and the Ameren Missouri request for expedited treatment.

Respectfully submitted,

/s/ Steven Dottheim

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 16th day of August, 2017.

/s/ Steven Dottheim