

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

In the Matter of Union Electric Company d/b/a       )  
Ameren Missouri's Request for a Waiver of       )  
Meter Testing Requirements in Anticipation of       )  
Automated Metering Infrastructure Deployment       )  
Beginning in 2020       )

**File No. EE-2019-0383**

**STAFF RESPONSE TO COMMISSION ORDER**  
**DIRECTING, IN PART, FILING OF STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff"), by and through Staff Counsel's Office, and submits its response to the Commission's August 22, 2019, Order Directing Notice, Setting Deadline For Intervention Requests, And Directing Filing Of Staff Recommendation. The Commission directed Staff to no later than September 21, 2019 file a recommendation or a request for additional time regarding the filing of its recommendation concerning the Application of Union Electric Company d/b/a Ameren Missouri for a waiver of certain meter testing requirements in anticipation of its deployment of Automated Metering Infrastructure ("AMI") beginning in 2020. Staff requests additional time for the filing of its recommendation to October 8, 2019. In support thereof, Staff states as follows:

1. On June 4, 2019, Ameren Missouri filed a Notice Of Case Filing establishing File No. EE-2019-0383, stating that on or after August 3, 2019, it would submit an application for a waiver from certain meter testing requirements, outlined in 4 CSR 240-10.030, in anticipation of its deployment of AMI beginning in 2020. On August 21, 2012, Ameren Missouri filed its Application And Request For Variance from 4 CSR 240 10.030(28).

2. On September 11, 2019, Staff technical staff met with Ameren Missouri technical staff to discuss Ameren Missouri's deployment of AMI beginning in 2020. On September 13, 2019, Staff submitted several Data Requests to Ameren Missouri, and Ameren Missouri has indicated it will endeavor to expedite responses. Assuming Staff does not require clarification, explanation, or additional information, or if so that it can be provided expeditiously, Staff is requesting until October 8, 2019 to file its recommendation. Staff is mindful of Ameren Missouri's statement in its Application And Request For Variance that it is not asking for expedited treatment for a Commission decision by October 31, 2019, but a decision by then would be beneficial.

**WHEREFORE** Staff requests additional time for the filing of its recommendation to October 8, 2019.

Respectfully submitted,

**/s/ Steven Dottheim**

Steven Dottheim, Mo. Bar #29149  
Chief Deputy Staff Counsel  
(573) 751-9285 (Fax)  
(573) 751-7489 (Phone)  
steve.dottheim@psc.mo.gov (E-mail)

Missouri Public Service Commission  
PO Box 360  
Jefferson City, MO 65102

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, transmitted by facsimile or electronically mailed to all counsel of record this 20th day of September, 2019.

**/s/ Steven Dottheim**

