

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's Request for a Variance) **Case No. EE-2022-0243**
from the Triennial Filing Date Requirement)
Found in 20 CSR 4240-22.080.)

Staff Recommendation

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Recommendation*, states as follows:

1. On March 10, 2022, Union Electric Company, doing business as Ameren Missouri, filed its *Request for Variance From 20 CSR 4240-22.080(1)(C) and Waiver of 60-Day Notice in 20 CSR 4240-4.017(1)*, stating that, while its next triennial compliance filing is due by April 1, 2023, it seeks a variance allowing it to make its next filing on or before October 1, 2023, because the results from its latest Demand Side Management potential study will not be available earlier.

2. On March 11, 2022, the Commission directed notice and ordered interested parties to seek to intervene by March 31, 2022, and for Staff to file its recommendation by April 11, 2022.

3. Only the Missouri Industrial Energy Consumers (“MIEC”) timely intervened. MIEC does not oppose Ameren Missouri’s request.

4. Because the good cause stated by Ameren Missouri is reasonable, Staff now advises the Commission to **APPROVE** Ameren Missouri’s request.

WHEREFORE, Staff prays that the Commission will **APPROVE** Ameren Missouri’s request to delay its required triennial compliance filing to October 1, 2023; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

/s/ Kevin A. Thompson

KEVIN A. THOMPSON

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Attorney for Staff of the

Missouri Public Service Commission

Certificate of Service

The undersigned hereby certifies that a true and correct copy of the foregoing has been served, by hand delivery, electronic mail, or First Class United States Mail, postage prepaid, to all parties herein pursuant to the Service List maintained by the Commission's Data Center on this **11th day of April, 2022.**

/s/ Kevin A. Thompson

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OF THE STATE OF MISSOURI

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Request for a)
Variance from the Triennial Filing Date)
Requirement Found in 20 CSR 4240-22.080) Case No. EE-2022-0243

AFFIDAVIT OF BRAD J. FORTSON

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW BRAD J. FORTSON and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Response*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

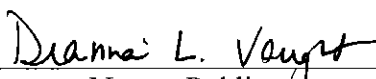


BRAD J. FORTSON

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 8th day of April, 2022.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2023
Commission Number: 15207377



Notary Public