

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

In the Matter of Ameren Missouri's Request for)	
A Variance from the Triennial Filing Date)	
Requirement Found in 4 CSR 240-22.080 and)	<u>File No. EE-2019-0104</u>
The Annual Update Requirement Found in)	
4 CSR 24-22.080(3))	

**STAFF RESPONSE TO AMEREN MISSOURI'S
REQUEST FOR VARIANCE FROM 4 CSR 240-22.080(1)(C) and (3)**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Staff Response to Ameren Missouri's Request for Variance from 4 CSR 240-22.080(1)(C) and (3)* states the following:

1. On October 16, 2018, Union Electric Company, d/b/a Ameren Missouri ("Ameren" or "Company"), filed a pleading asking the Missouri Public Service Commission to grant the Company a variance from its triennial compliance requirement, which requires the filing to be made by April 1, 2020, and, instead, allow it to make its next filing on or before October 1, 2020. Ameren also requested a variance to delay the annual updates from April 1 to October 1 in subsequent years.

2. On October 16, 2018, the Commission ordered any party wishing to respond to Ameren's request to do so no later than October 31, 2018.

3. Staff has no objection to Ameren's request for the good cause reasons contained in the Company's October 16, 2018 filing.

WHEREFORE, Staff submits its *Staff Response to Ameren Missouri's Request for Variance from 4 CSR 240-22.080(1)(C) and (3)* set forth above for the Commission's consideration.

Respectfully submitted,

/s/ Ron Irving

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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 14th day of November, 2018.

/s/ Ron Irving