

**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 Variance from))
Certain Provisions of 20 CSR 4240 Chapter 22)
Regarding Electric Utility Resource Planning)

File No. EE-2020-0007

STAFF'S NON-OBJECTION TO REQUESTED RELIEF

COMES NOW the Staff of the Public Service Commission, by and through counsel, and states to the Commission that it does not object to Union Electric Company d/b/a Ameren Missouri's ("Ameren Missouri") requested relief from certain provisions of 20 CSR 4240 Chapter 22 as follows:

1. Commission Rule 20 CSR 4240-22.080(13) provides:

(13) Upon written application made at least twelve (12) months prior to a triennial compliance filing, and after notice and an opportunity for hearing, the commission may waive or grant a variance from a provision of 20 CSR 4240-22.030 – 20 CSR 4240-22.080 for good cause shown. The commission may grant an application for waiver or variance filed less than twelve (12) months prior to the triennial compliance filing upon a showing of good cause for the delay in filing the application for waiver or variance.

(A) The granting of a variance to one (1) electric utility which waives or otherwise affects the required compliance with a provision of this chapter does not constitute a waiver respecting, or otherwise affect, the required compliance of any other electric utility with a provisions of these rules.

(B) The commission will not waive or grant a variance from this chapter in total.

2. Ameren Missouri is required to file its next Chapter 22 triennial compliance filing not later than October 1, 2020.
3. Twelve (12) months in advance of October 1, 2020, on September 19, 2019, Ameren Missouri filed its application –titled *Request for Variance Pursuant to Certain Provisions of 4 CSR 240 Chapter 22*¹—requesting relief from strict compliance with a number of the Commission's rules in 20 CSR 4240-22. That application initiated this Case No. EE-2020-0007, and the specific relief requested,

¹ Effective August 28, 2019, the Commission moved from the Department of Economic Development to the Department of Commerce and Insurance, and Commission rules moved from 4 CSR 240 to 20 CSR 4240.

as well as Ameren Missouri's good cause justifications for that relief, is set out in Attachment A to that application.

4. Staff has reviewed each proposal and rationale in Ameren Missouri's application, and Staff has no objection to Ameren Missouri's requested relief.
5. Staff notes that in a previous Ameren Missouri *Request for Waivers*, File No. EE-2017-0098, all of the waivers requested in this case were included and approved.
6. Staff has verified that Ameren Missouri has filed its 2018 annual report and is not delinquent on the quarterly payment of its assessment, and Staff is not aware of any other matter pending before the Commission that affects or is affected by this filing.

WHEREFORE, Staff states to the Commission that it does not object to Union Electric Company d/b/a Ameren Missouri's requests for relief from strict compliance with certain provisions of 20 CSR 4240-22 as set out in Attachment A to its application in this case.

Respectfully submitted,

/s/ Casi Aslin

Casi Aslin

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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 this 24th day of October, 2019.

/s/ Casi Aslin