

**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 Variance from )	<b><u>File No. EE-2020-0191</u></b>
Certain Provisions of 20 CSR 4240-20.065 )	Tariff No. YE-2020-0111
Regarding Net Metering Applications )	

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission, through counsel, and files its *Staff Recommendation* regarding Ameren Missouri's application seeking a variance from a provision of 20 CSR 4240-20.065(9)(A). Staff states as follows:

1. On January 3, 2020 Ameren Missouri filed an application requesting a variance from a provision of 20 CSR 4240-20.065(9)(A). This regulation states that an electric utility's net metering interconnection application/agreement "shall substantially be the same as the interconnection application/agreement included herein." Ameren Missouri wants to include in its interconnection application/agreement questions related to customer-sited battery storage. The model interconnection application/agreement in the net metering rules does not contain any question about battery usage.

2. Ameren Missouri filed an amended request on January 13 in which it additionally requested a variance from the 60 day notice requirement of 20 CSR 4240-4.017(1). Ameren Missouri verified that in the prior 150 days it had no Commission communication regarding any issue likely to be substantive in this case.

3. On February 4 the Commission ordered Staff to file a recommendation by February 18.

4. Staff reviewed Ameren Missouri's request and recommends that the variance be granted. Ameren Missouri notes in its application, and Staff agrees, that this

information is important for the safety of Ameren Missouri's personnel and for the administrative review of interconnection applications. Further, in file number EW-2017-0245 Staff recommended specific revisions to Chapter 22 which include a requirement that electric utilities maintain a database of distributed generation and storage in order to evaluate current penetration and future increases of these resources.<sup>1</sup> The information obtained from Ameren Missouri's requested variance would provide a source of information consistent with this potential future requirement.

5. Staff does not oppose Ameren Missouri's request for a variance of the 60 day notice requirement.

6. Ameren Missouri filed a proposed tariff sheet 171.8 incorporating the battery storage questions. If the Commission grants the requested variance, Staff offers that the tariff sheet is acceptable, except for a necessary update to its effective date.<sup>2</sup>

**WHEREFORE**, Staff recommends that the Commission grant Ameren Missouri's requested variance from a provision of 20 CSR 4240-20.065(9)(A) and approve its proposed tariff sheet 171.8.

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<sup>1</sup> Staff of the Missouri Public Service Commission, *Notice of Fourth Draft Rule for Comment and Fiscal Impact Estimates*, filed January 20, 2020. Specifically, see draft rule 20 CSR 4240-22.055(2).

<sup>2</sup> On January 31, 2020 the Commission suspended the tariff sheet, Tariff No. YE-2020-0111, until March 31, 2020, unless otherwise ordered by the Commission.

Respectfully submitted,

**/s/ Karen E. Bretz**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been electronically mailed to all parties and/or counsel of record on this 13th day of February, 2020.

**/s/ Karen E. Bretz**