

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

In the Matter of Ameren Missouri's	)	
Request for a Variance from	)	<u>File No. EE-2017-0098</u>
Certain Provisions of 4 CSR 240 Chapter 22	)	
Regarding Electric Utility Resource Planning	)	

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") request for relief from strict compliance with certain provisions of the Commission's Chapter 22 rules (4 CSR 240-22) as follows:

1. Commission Rule 4 CSR 240-22.080(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 4 CSR 240-22.030 – 4 CSR 240-22.080 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 provision 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, 2017.¹

¹ See Order Granting Variance issued July 22, 2015, in File No. EE-2015-0316.

3. Twelve (12) months in advance of October 1, 2017, on September 30, 2016, Ameren Missouri filed its application—titled, *Request for Variance Pursuant to Certain Provisions of 4 CSR 240 Chapter 22*—requesting relief from strict compliance with a number of the Commission's rules in 4 CSR 240-22. That application initiated this Case No. EE-2017-0098, and the specific relief requested, as well as Ameren Missouri's good cause justifications for that relief, is set out in Attachment A to that application.

4. Staff appreciates that prior to filing its application in this case Ameren Missouri solicited and received input from stakeholders during its resource planning advisory group meetings regarding relief from strict compliance with certain provisions of the Commission's Rules in 4 CSR 240-22.

5. Staff has reviewed each proposal and rationale in Ameren Missouri's application, and Staff has no objection to Ameren Missouri's requested relief.

6. Staff notes that in a previous Ameren Missouri *Request for Waivers*, File No. EE-2014-0089, all of the waivers requested in this case were included and approved, with the exception of the current request for waiver of 4 CSR 240-22.080(5)(A).

7. Staff has verified that Ameren Missouri has filed its 2015 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 the Commission's Chapter 22 Rules (4 CSR 240-22) as set out in Attachment A to its application that initiated this case.

Respectfully submitted,

/s/ Marcella L. Forck

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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 of record on the Service List maintained for this case by the Data Center of the Missouri Public Service Commission, on this 28th day of December, 2016.

/s/ Marcella L. Forck