

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri for a Variance from) **File No. EE-2020-0314**
Portions of Its Keeping Current Tariffs.)

STAFF RECOMMENDATION

COMES NOW Staff of the Missouri Public Service Commission and for its Recommendation in this matter respectfully states as follows:

1. On April 3, 2020, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) filed a request for variance or waiver from the 60-day notice requirement of 20 CSR 4240-4.017 and from provisions of its tariffs related to certain eligibility criteria for its Keeping Current Low-Income Pilot Program (“Keeping Current”) during the COVID-19 pandemic, specifically the following portion of Pilots, Variances, and Promotional Practices, D. Keeping Current Low-Income Pilot Program Tariff Sheet Nos. 160.1 and 160.2:

1. Participants must remain current within two (2) billing cycles to continue on Program. Participants that default on payments for two (2) consecutive months will be removed from the Program and not be allowed back into the Program for twelve (12) months except that a Keeping Current Agency may request a one-time re-enrollment for a defaulted Participant experiencing a short-term, unanticipated financial hardship. As a one-time exception during the twenty-four (24) month enrollment period, Participants with a missed, late or partial payment will be allowed to receive the monthly bill credit and still be considered current on the program.

2. The Company states in its filing that it is asking that the foregoing tariff provision be waived indefinitely, and states that it will continue to monitor the pandemic and as it becomes apparent that the outbreak is waning and normal routines may be reinstated it will examine the reinstatement of the foregoing tariff provision; Ameren Missouri states that it will provide at least 15 days’ notice to affected customers

before the foregoing limitations are reinstated. Staff notes that it would sincerely hope that Ameren Missouri would file a notice in this docket notifying the Commission, Staff, and the Office of the Public Counsel at or before the time that it notifies customers that the foregoing tariff provision is being reinstated.

3. Staff would note that the Company's tariffs allow the Company to seek a waiver from the Commission from its tariffs for good cause shown. Due to the highly unusual situation presented by the current COVID-19 pandemic, Staff believes the Company has shown good cause for a waiver of the above tariff provision in this circumstance and recommends the Commission approve the Company's request.

WHEREFORE, Staff recommends the Commission issue an order approving Ameren Missouri's request for variance or waiver of that portion of its Keeping Current program tariffs set forth in its request, as well as the 60-day notice requirement of 20 CSR 4240-4.017.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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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 as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 7th day of April, 2020.

/s/ Jeffrey A. Keevil