

**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 Waivers For Its 2014)
Utility Resource Filing Pursuant to)
4 CSR 240 – Chapter 22)

Case No. EE-2014-0089

STAFF'S NON-OBJECTION TO REQUESTED RELIEF

COMES NOW the Staff of the Public Service Commission of the State of Missouri ("Staff") and 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 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. In File No. EE-2013-0312, on December 19, 2012, the Commission authorized Ameren Missouri to vary from the rule 4 CSR 240-240.22080(1)(C) requirement that it make its next triennial utility resource planning compliance filing on April 1, 2014, by giving it until October 1, 2014, to make that filing.

3. Twelve months in advance of October 1, 2014, on October 1, 2013, Ameren Missouri filed its application—titled, *Request for Waivers*—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-2014-0089, and the specific relief requested, as well as Ameren Missouri's 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 in its resource planning processes regarding relief from strict compliance with 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 has verified that Ameren Missouri has filed its 2012 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/ Nathan Williams

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 25th day of October, 2013.

/s/ Nathan Williams