

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's Filing to Change Criteria for)
Assessment of New Customer Deposits)

File No. ET-2014-0076

**STAFF'S RECOMMENDATION TO APPROVE TARIFF SHEETS ALLOWING THE
COMPANY TO USE CREDIT SCORING TO DETERMINE WHEN TO ASSESS A NEW
CUSTOMER DEPOSIT**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and in support of this *Recommendation to Approve Tariff Sheets*, states:

1. On December 9, 2013, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed tariff sheets¹ to change the criteria the company uses to determine whether to assess a deposit on new customer accounts for natural gas and electric service.

2. On January 29, 2014², the Commission issued an *Order Consolidating Cases*, in which File No. GE-2014-0180 is consolidated into File No. ET-2014-0076.

3. Also on January 29th, the Commission issued its *Order Adopting Procedural Schedule* in which it set a settlement conference on February 21st and ordered that Staff file a recommendation in the matter no later than February 28th if the parties did not reach an agreement. Staff requested and was granted an extension until March 7th to allow more time for the parties to attempt to reach a settlement on the filed electric and natural gas tariff sheets in this matter³. Despite the parties participating in

¹ MO.P.S.C Schedule No. 6, 1st Revised Sheet Nos. 139 and 141 for the electric utility and PSC Mo. No. 2, 1st Revised Sheet No. 61 and 4th Revised Sheet No. 63 for the natural gas utility.

² All dates herein refer to 2014 unless otherwise stated.

³ The Commission's *Order Granting Extension To File Staff Recommendation* on February 26, 2014.

multiple settlement discussions attempting to reach a resolution satisfactory to all parties, a settlement will not be reached before Staff's recommendation is due.

4. Accordingly, Staff has prepared its *Recommendation to Approve Tariff Sheets*, attached hereto as Appendix A (Memorandum and Attachments 1-6) and incorporated by reference, which details Staff's investigation and conclusions. Staff recommends the Commission approve the electric and natural gas tariff sheets submitted in this case which allow Ameren Missouri to use credit scoring when determining when to assess a new customer deposit.

5. In its application, Ameren Missouri initially requested a variance from Commission Rule 4 CSR 240-13.030. However, recently the Commission has revised Rule 4 CSR 240-13.030 to allow for the use of credit scoring as is currently sought by Ameren Missouri, which will become effective on March 30, 2014⁴. Because Ameren Missouri's proposed tariff sheets have an effective date of April 8th, a variance from the rule is not necessary.⁵

WHEREFORE, Staff hereby tenders its *Recommendation to Approve Tariff Sheets*, for the Commission's information and consideration.

⁴ The rulemaking case that addressed credit scoring was File No. AX-2013-0091.

⁵ Ameren Missouri voluntarily extended the effective date of those tariff sheets by 60 days to April 8, as noted by the Commission in its January 29th *Order Adopting Procedural Schedule*.

Respectfully submitted,

/s/ Tim Opitz

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed with first-class postage, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 7th day of March, 2014.

/s/ Tim Opitz