

3. Ameren Missouri seeks variances from 20 CSR 4240-22.040 (3)(A), 20 CSR 4240-22.045 (1)(B), 20 CSR 4240-22.045 (3)(C), 20 CSR 4240-22.060 (5)(E), 20 CSR 4240-22.060 (5)(F), 20 CSR 4240-22.060 (5)(K), 20 CSR 4240-22.060 (5)(L), 20 CSR 4240-22.060 (7), 20 CSR 4240-22.080 (2)(C)2, and 20 CSR 4240-22.080 (5)(A).

4. On September 27, 2022, the Commission ordered Staff to file its recommendation regarding *Ameren Missouri's Request for Variance* no later than November 3, 2022.

5. Staff has reviewed Ameren Missouri's proposed variances to Chapter 22 and has no objection to Ameren Missouri being granted a one-time variance from those provisions of 20 CSR 4240 Chapter 22 set forth above for its next triennial compliance filing on October 1, 2023.

Wherefore, Staff recommends to the Commission that it grant Ameren Missouri a one-time variance from certain provisions of the Commission's Chapter 22 rules as requested in Ameren Missouri's request, for good cause shown.

Respectfully submitted,

/s/ Eric Vandergriff

Eric Vandergriff
Legal Counsel
Missouri Bar No. 73984
P.O. Box 360
Jefferson City, MO 65012
(573) 522-9524 (Telephone)
(573) 751-9285 (Fax)
Eric.Vandergriff@psc.mo.gov

Counsel for the Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record on this 3rd day of November, 2022.

/s/ Eric Vandergriff

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 a) Case No. EE-2023-0021
Variance from Certain Provisions of)
20 CSR 4240 Chapter 22 Regarding Electric)
Utility Resource Planning

AFFIDAVIT OF BRAD J. FORTSON

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW BRAD J. FORTSON and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Response*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.




BRAD J. FORTSON

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 3rd day of October, 2022.

DIANNA L VAUGHT
Notary Public - Notary Seal
STATE OF MISSOURI
Cole County
My Commission Expires: July 18, 2023
Commission #: 15207377



Notary Public