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

STAFF'S RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and for its *Recommendation regarding Ameren Missouri's Request for Variance*, states the following:

- 1. On September 27, 2022, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), filed a pleading asking the Missouri Public Service Commission to grant the Company a variance from or clarification of several provisions within 20 CSR 4240 Chapter 22.
 - 2. Commission Rule 20 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.

- 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 $3^{\rm rd}$ day of November, 2022.

/s/ Eric Vandergriff

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Union Electory d/b/a Ameren Missouri's R. Variance from Certain Prov 20 CSR 4240 Chapter 22 R Utility Resource Planning	quest for a) Case No. EE-2023-0021 sions of)
	FFIDAVIT OF BRAD J. FORTSON
STATE OF MISSOURI)) ss.
COUNTY OF COLE)
,	
	JURAT
Subscribed and sworn be	Fore 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	Deanne: L. Vauy Notary Public