

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

In the Matter of a Determination of Special)	
Contemporary Resource Planning Issues to be)	
Addressed by Ameren Missouri in its Next)	File No. EE-2018-
Triennial Compliance Filing or Next Annual)	
Update Report.)	

**AMEREN MISSOURI'S REQUEST FOR WAIVERS AND
REQUEST FOR EXPEDITED TREATMENT**

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company), and for its *Request for Waivers and Request for Expedited Treatment*, states as follows:

1. Ameren Missouri seeks three waivers for good cause shown. One from 4 CSR 240-4.017, to excuse it from filing a 60-day notice prior to filing this pleading, one from 4 CSR 22.080(3), and one from 4 CSR 240-22.080(4). The last two regulations are the sections of the Missouri Public Service Commission's (MPSC) Integrated Resource Planning rules on Special Contemporary Issues and Annual Updates.

Request for Waiver from 4 CSR 240-4.017

2. Consistent with the waiver granted by the Commission in File No. EE-2015-0316, Ameren Missouri will submit its next comprehensive triennial Integrated Resource Plan (IRP) filing on September 29, 2017.

3. Under 4 CSR 240-4.017, waivers of the 60-day notice requirement may be granted for good cause shown. Good cause includes providing a verified statement that no communications have occurred with the office of the commission within the preceding 150 days regarding a substantive issue likely to be in the case, or that circumstances prevented filing the required notice and that requiring the notice would cause harm. While either of these grounds

alone are sufficient to establish good cause for the requested waiver, this filing qualifies for a waiver on both grounds.

4. As the verification attached hereto as Exhibit A indicates, Ameren Missouri has had no communications regarding any substantive issue likely to be in this case during the preceding 150 days. Moreover, Ameren Missouri could not have complied with the 60-day notice requirement because it only just became effective for a case of this type earlier this week. This is because under the prior 60-day notice requirement in the former rule, such notices were only required for contested cases; this case is a non-contested case under Missouri law. *See* Section 536.010(4), RSMo. (2016). Moreover, as explained further below, Ameren Missouri requests a Commission order on or before September 1, 2017, so parties can avoid investing time and resources in developing and preparing a list of issues (which would be due September 15) under 4 CSR 240-22.080(3), for which a waiver is also being requested.

5. For these reasons, Ameren Missouri has established good cause for a waiver from 4 CSR 240-4.017(1) for this request.

Request for Waivers of 4 CSR 240.22-080(3) and 080(4)

6. 4 CSR 240-22.080(13) authorizes the Commission to grant a waiver from provisions of 4 CSR 22.030 – 22.080 for good cause shown where the waiver request is made within 12 months of the Company's IRP filing.

7. The Commission's IRP rules, at 4 CSR 240-22.080(3), require an annual update workshop and report on or about April 1st of each year, with an annual update report to be filed with the Commission at least twenty (20) days prior to the annual update workshop. In the annual update report and during that annual update workshop, Special Contemporary Issues determined by the Commission in the prior year are addressed. For the reasons outlined below,

good cause exists to grant Ameren Missouri a waiver of the requirements for an annual update filing in March 2018 and an annual update workshop in April 2018.

8. 4 CSR 240-22.080(3) requires the Company to provide, among other items, an update on the resolution of any deficiencies from its IRP, as well as its progress in implementing its resource acquisition strategy, which is reflected in its IRP. The rule assumes an order has been issued on the Company's IRP filing as evidenced by, for example, the fact that until a Commission order on each triennial IRP filing has been issued, there will have been no identification of any deficiencies upon which to provide an update.

9. The Commission's IRP rules that govern the processing of a utility's triennial IRP filing also provide for review of a utility's triennial IRP filing by Commission Staff (Staff) and other stakeholders and reports based on that review within 150 days of the utility's filing. In this case, those reports would not be due until February 26, 2018, just thirty-four (34) days before the annual update report would otherwise be due.

10. The Commission's IRP rules further provide for the filing of a joint agreement regarding any agreed-upon remedies for alleged deficiencies or concerns among the utility, Staff and other stakeholders within sixty (60) days of the filing of reports by Staff and other stakeholders (which would be due April 27, 2018). The rules also provide for the filing of a response by the utility regarding any alleged deficiencies or concerns for which agreement as to a remedy is not reached. This response must also be filed within sixty (60) days of the filing of reports by Staff and other stakeholders (which would be due by June 26, 2018). In this case, a joint agreement and/or a response from Ameren Missouri could be filed as late as June 26, 2018, after which time the Commission would issue an order indicating on what items, if any, a hearing will be held and establishing a procedural schedule.

11. It is a virtual certainty that the Commission will not have issued an order on Ameren Missouri's September 29, 2017, IRP filing before April 1, 2018. Looking back at the three prior Ameren Missouri IRP filings, it typically took longer than a year before the final order was issued. File No. EO-2007-0409 was filed on February 5, 2008, and the Commission's order became effective on March 1, 2009. File No. EO-2011-0271 was filed on February 23, 2011, and the final order became effective on April 27, 2012. File No. EO-2015-0084 was filed on October 1, 2014, and the final order became effective on November 1, 2015. These cases take a long time to process, primarily because there are typically multiple complicated issues to be addressed in these proceedings, oftentimes even longer than the timeline set forth in the Commission's IRP rules.

12. Consequently, the filing of an annual update in March 2018 and the holding of a workshop on or about April 1, 2018, are unnecessary, justifying a waiver of those requirements.

13. The request for a waiver of 4 CSR 240-22.080(4), which addresses an annual determination of Special Contemporary Issues, rests on much the same facts. Any suggested Special Contemporary Issues are to be suggested by other parties by September 15, with comments on those suggestions due October 1, and a Commission order containing a list of Special Contemporary Issues to be issued by November 1. As earlier noted, the Special Contemporary Issues docket would result in a list of issues to be addressed in the Company's next annual update workshop and/or report. It is, however, premature to order Ameren Missouri to respond to new issues before its 2017 IRP is resolved. Consequently, good cause exists to grant Ameren Missouri a waiver from the requirement found in 4 CSR 240-22.080(4) in its entirety for 2017, eliminating the need for others to suggest contemporary issues, for the Company to respond, and for the Commission to rule.

Request for Expedited Treatment

14. Ameren Missouri requests a Commission order on these requests by September 1, 2017, which should obviate the need for others to devote significant time and effort to developing potential Special Contemporary Issues that otherwise would have to be filed by September 15, 2017.

WHEREFORE, Ameren Missouri respectfully submits its request for a waiver of 4 CSR 240-4.017(1), the above-described requirements contained in 4 CSR 240-22.080(3) for 2018 and of 4 CSR-22.080(4) in its entirety for 2017 and requests that such waivers be granted on or before September 1, 2017.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ Wendy K. Tatro
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Request was served on the parties of record in this case via electronic mail (e-mail) on this 2nd day of August, 2017.

/s/ Wendy K. Tatro

Wendy K. Tatro

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AFFIDAVIT OF MATT MICHELS

STATE OF MISSOURI)
) ss
CITY OF ST. LOUIS)

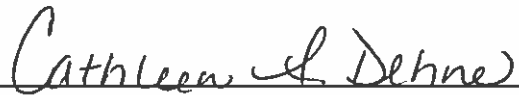
Matt Michels, being first duly sworn on his oath, states:

1. My name is Matt Michels. I work in the City of St. Louis, Missouri, and I am employed by Ameren Services Company as Director Corporate Analysis. I supervise Ameren Missouri's Integrated Resource Planning work, including work relating to Special Contemporary Issues.
2. Neither Union Electric Company d/b/a Ameren Missouri nor any person on its behalf has had any communications with the office of the Commission regarding any substantive issue likely to be an issue in the case initiated by this filing during the preceding 150 days.
3. I hereby swear and affirm that the information contained is true and correct.



Matt Michels

Subscribed and sworn to before me this 2nd day of August, 2017.



Notary Public

My commission expires: March 7, 2021

