**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of the Application of Union Electric)

Company d/b/a Ameren Missouri for a Variance)

From the Provisions of Commission Rule 4 ) **Case No. EE-2019-0395**

CSR 240-14 to Meet Unregulated Competition ) Tracking No. YE-2019-0223

In a Subdivision in St. Charles County, Missouri)

**STAFF RECOMMENDATION**

**COMES NOW** Staff of the Missouri Public Service Commission, and in support of its *Staff Recommendation* (which is attached hereto and incorporated herein by reference) states as follows:

1. On June 14, 2019, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) filed an *Application, Request for Waiver, and Motion for Expedited Treatment* (“Application”) requesting a variance from the applicable provisions of its tariff, Commission Rule 4 CSR 240-14, and Commission   
Rule 4 CSR 240-4.017, to enable it to compete with an unregulated electric service provider. Ameren Missouri also filed a revised tariff sheet to add this case to the list of unregulated competition waivers approved by the Commission for the Company.

2. On June 17, 2019, the Commission issued, by delegation of authority, an *Order Providing Notice, Establishing Intervention Deadline, And Directing Response* (“Order”) in which it ordered Staff to file a recommendation concerning the Application and tariff sheet no later than June 24, 2019.

3. Due to the expedited nature of Ameren Missouri’s request and the date set for Staff’s recommendation by the Commission’s Order, Staff was not able to conduct a thorough investigation of this Application. If the values of estimated expenses and potential revenues presented in the Application by Ameren Missouri are correct, then the overall customer base would realize a benefit from the requested variances, not just the developer and Ameren Missouri. However, due to the limited time to review the Application, Staff was not able to thoroughly review the estimated expenses and revenues. Therefore, as it does with many cases of this nature, Staff recommends the Commission not make any ratemaking determination related to this request in this case.

4. Based on the representations made by Ameren Missouri in its Application, Staff recommends that the Commission issue an order approving Ameren Missouri’s Application, granting a variance from tariff Section III.J.2.a of the Company’s General Rules and Regulations, Schedule 6, Sheet No. 118; Commission Rule 4 CSR 240-14; and Commission Rule 4 CSR 240-4.017. Staff also recommends the Commission approve the revised tariff sheet filed by Ameren Missouri in this case to add this case to the list of unregulated competition waivers approved by the Commission for the Company. Staff further suggests that the Commission note in any order approving the Application that it is making no ratemaking determination in this matter and that any effect of this transaction will be addressed in the applicable general rate case proceeding of   
Ameren Missouri.

**WHEREFORE**, Staff submits the attached *Staff Recommendation* as ordered by the Commission.

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

Jeffrey A. Keevil

Missouri Bar No. 33825

P. O. Box 360

Jefferson City, MO 65102

(573) 526-4887 (Telephone)

(573) 751-9285 (Fax)

Email: [jeff.keevil@psc.mo.gov](mailto:jeff.keevil@psc.mo.gov)

Attorney for the Staff of the

Missouri Public Service Commission

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 24th day of June, 2019.

**/s/ Jeffrey A. Keevil**