

**STATE OF MISSOURI  
PUBLIC SERVICE COMMISSION**

At a session of the Public Service  
Commission held at its office in  
Jefferson City on the 30<sup>th</sup> day  
of October, 2019.

In the Matter of Union Electric Company	)	
d/b/a Ameren Missouri's Request for a	)	
Waiver of Meter Testing Requirements in	)	<b>File No. EE-2019-0383</b>
Anticipation of Automated Metering	)	
Infrastructure Deployment Beginning in	)	
2020		

**ORDER GRANTING WAIVER OF METER TESTING REQUIREMENTS**

Issue Date: October 30, 2019

Effective Date: November 29, 2019

On August 21, 2019, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed an application with the Missouri Public Service Commission ("Commission") seeking a waiver of certain meter testing requirements in anticipation of its deployment of Automated Metering Infrastructure beginning in 2020.<sup>1</sup> Ameren Missouri states it can conserve resources and avoid unnecessary and redundant testing of assets already scheduled for replacement. Ameren Missouri contends such resource conservation constitutes good cause and benefits both it and customers. Ameren Missouri notes no other public utility will be affected by the requested variance.

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<sup>1</sup> Commission rule 20 CSR 4240-10.030(28). Effective August 28, 2019, all of the Commission's regulations were transferred from the Department of Economic Development's (DED) Title 4 to the Department of Commerce and Insurance's (DCI) (formerly Department of Insurance, Financial Institutions and Professional Registration) Title 20. For consistency, all references herein are to the new numbers, which do not change the end rule number citation. E.g. 4 CSR 240-2.010 will now be 20 CSR 4240-2.010.

On October 15, 2019, Staff filed its recommendation to approve the requested waiver. Staff states that the Ameren Missouri automated meter reading (“AMR”) meters being replaced are nearing or have exceeded the manufacturer’s expected useful life and will no longer be supported by the manufacturer in the near future. Staff also notes that the replacement of meters is limited in that the expense of the meters cannot exceed 6% of the amount spent in any given year on the overall Smart Energy Plan. Staff requests that the Commission note that no ratemaking determination is being addressed in this proceeding or in the Commission’s Order, and that the Commission reserve the right to consider ratemaking treatment asserted to be associated with the action, if any, in a later rate proceeding.

Commission Rule 20 CSR 4240-2.080(13) states that parties have ten days to respond to pleadings unless otherwise ordered. Ten days have elapsed since filing of the *Staff Recommendation*. No party has objected to the recommendation.

The Commission finds that good cause has been shown to grant the uncontested request for a waiver of the Meter Testing Requirements. The good cause found by the Commission is in the conservation of resources in not testing meters at the end of their life expectancy and which will be replaced in the near future. The Commission will grant the uncontested request to waive the Meter Testing Requirements of Commission rule 20 CSR 4240-10.030(28).

**THE COMMISSION ORDERS THAT:**

1. Union Electric Company d/b/a Ameren Missouri’s application for waiver of Commission rule 20 CSR 4240-10.030(28) is granted.

2. The Commission states that no ratemaking determination is being addressed in this proceeding or in this *Order*. The Commission further reserves the right to consider ratemaking treatment asserted to be associated with this action, if any, in a later rate proceeding.

3. This order shall become effective on November 29, 2019.

4. This case shall be closed on November 30, 2019.

**BY THE COMMISSION**



A handwritten signature in cursive script that reads "Morris L. Woodruff".

Morris L. Woodruff  
Secretary

Silvey, Chm., Kenney, Hall, Rupp, and  
Coleman, CC., concur.

Hatcher, Regulatory Law Judge

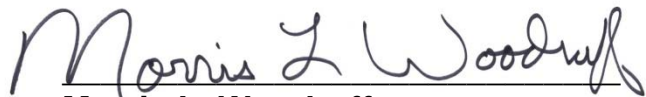
**STATE OF MISSOURI**

**OFFICE OF THE PUBLIC SERVICE COMMISSION**

**I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.**

**WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 30<sup>th</sup> day of October 2019.**



  
**Morris L. Woodruff**  
**Secretary**

**MISSOURI PUBLIC SERVICE COMMISSION**

**October 30, 2019**

**File/Case No. EE-2019-0383**

**Missouri Public Service  
Commission**

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**Union Electric Company**

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***Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).***

***Sincerely,***



**Morris L. Woodruff  
Secretary**

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Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.