

**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 an Order Changing Testing Requirements)
For Two Phase, Three Wire, 120/208V)
Meters)
Case No. EE-2013-0009

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through Staff Counsel’s Office, and files its analysis and recommendation concerning the request of Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) for a variance from Commission Rule 4 CSR 240-10.030(28)(C). In support thereof, the Staff states as follows:

1. On July 3, 2012, Ameren Missouri filed an *Application and Request for Variance* (“Application”) with the Missouri Public Service Commission (“Commission”) pursuant to 4 CSR 240-2.060, in which Ameren Missouri requested a variance from Commission Rule 4 CSR 240-10.030(28)(C) related to testing “two phase, three wire, 120/208V meters.”¹ Although the Application relates to “two phase, three wire, 120/208V meters,” Ameren Missouri captioned this case as “In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for an Order Changing Testing Requirements for Single Phase Meters.” As shown in the caption above, Staff has corrected the caption of the case in this pleading, and requests that the Commission’s subsequent Orders in this case reflect the appropriate caption to prevent future confusion concerning the meters to which the requested variance applies.

¹ Application paragraph number 7.

2. On July 5, 2012, the Commission issued an *Order Directing Filing of Staff Recommendation*, in which the Commission ordered that Staff file its recommendation in this case no later than August 6, 2012.

3. After reviewing Ameren Missouri's Application, as well as Ameren Missouri's responses to data requests, Staff has issued its Staff Memorandum, attached as Appendix A, which recommends that the Commission grant Ameren Missouri's requested variance as described in the attached Appendix A.

4. As reflected in the attached Appendix A, Staff verified that Ameren Missouri has filed its annual report and is not delinquent on any assessment.

WHEREFORE, the Staff files its analysis and recommendation that the Commission grant Ameren Missouri's requested variance as described in the attached Appendix A.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed with first-class postage, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 6th day of August, 2012.

/s/ Jeffrey A. Keevil