

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

In the Matter of Union Electric Company d/b/a)	
Ameren Missouri's Filing to Change Criteria)	File No. ET-2014-0076
For Assessment of New Customer Deposits.)	

REQUEST FOR VARIANCE

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "the Company"), and pursuant to 20 CSR 4240-4.017(1)(D), submits this *Request for Variance*, which would allow the late submission of quarterly reports required by the *Unanimous Stipulation and Agreement* ("Agreement") that was executed by the parties to this proceeding on April 2, 2014, and approved by the Missouri Public Service Commission ("Commission") in its *Order Approving Stipulation and Agreement and Approving Tariffs* issued April 2, 2014. In support of its position, Ameren Missouri states as follows:

1. On April 2, 2014, Ameren Missouri and the parties to this proceeding executed an *Agreement* allowing it to use credit scoring (specifically, the Equifax Advanced Energy Risk Score, or EAER Score) to determine when to collect deposits from new customers. In Paragraph 6 of the *Agreement*, Ameren Missouri agreed to provide the following information, on a quarterly basis, for as long as the program is designated as experimental: 1) the number of customer applications for new residential service made to Ameren Missouri, 2) the number of those applications that result in a requirement for a deposit due to the result of an EAER Score, and 3) the amount of each deposit required. Further, in Paragraph 5 of the *Agreement*, Ameren Missouri agreed that it could request the experimental designation be removed in a future rate case. To date, Ameren Missouri has not requested this designation be lifted.

2. Ameren Missouri began submitting information, including when deposit requirements were satisfied and when deposits were refunded, in non-case filings through EFIS after the *Agreement* was executed and continued to do so through the last quarter of 2019. In 2020, with the impacts of COVID-19 on credit and collections operations, as well as personnel changes, this reporting fell through the cracks.

3. Ameren Missouri recently conducted a review of its regular filings and identified this oversight. Accordingly, it has prepared the missing reports and is submitting them as non-case filings through EFIS in accordance with past practice. The Company apologizes for the error. Given the time that has elapsed since entering into the *Agreement* and the fact that no party raised a concern in the interim, Ameren Missouri does intend to request the removal of the experimental designation for this program in a future rate case, at which point it can properly discontinue the submission of these reports.

4. Ameren Missouri requests a variance from the *Agreement* to the extent necessary to accept the late submission of its quarterly reports as non-case filings through EFIS. Good cause is shown for this variance because the Company is submitting all of the missing reports, and no party expressed a concern with the lack of their submission in the interim.

WHEREFORE, Ameren Missouri respectfully requests that the Commission grant the requested variance from the *Agreement* and accept the late submission of the missing quarterly reports.

Respectfully submitted,

/s/ Paula N. Johnson

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