

20 CSR 4240-22.060 (5)(F), 20 CSR 4240-22.060 (5)(K), 20 CSR 4240-22.060 (5)(L), 20 CSR 4240-22.060 (7), 20 CSR 4240-22.080 (2)(C)2, and 20 CSR 4240-22.080 (5)(A).

4. On September 22, 2025, the Commission ordered Staff to file its recommendation regarding *Ameren Missouri's Request for Variance* no later than October 22, 2025.

5. Staff has reviewed Ameren Missouri's proposed variances to Chapter 22 and has no objection to Ameren Missouri being granted a one-time variance from those provisions of 20 CSR 4240 Chapter 22 set forth above for its next triennial compliance filing on October 1, 2026.

WHEREFORE, Staff recommends to the Commission that it grant Ameren Missouri a one-time variance from certain provisions of the Commission's Chapter 22 rules as requested in Ameren Missouri's request, for good cause shown.

Respectfully submitted,

/s/ Stephanie Scott

Stephanie Scott

Legal Counsel

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**Counsel for the Staff of the
Missouri Public Service Commission**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record on this day of October 20, 2025.

/s/ Stephanie Scott

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Request for a) Case No. EE-2026-0071
Variance from Certain Provisions of)
20 CSR 4240 Chapter 22 Regarding Electric)
Utility Resource Planning)

AFFIDAVIT OF BRAD J. FORTSON

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW BRAD J. FORTSON and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.



BRAD J. FORTSON

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 16th day of October 2025.

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: July 18, 2027 Commission Number: 15207377



Notary Public