

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

In the Matter of Union Electric ) Company d/b/a Ameren Missouri's ) Tariffs to Adjust Its Revenues for ) Electric Service )	Case No. ER-2021-0240
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**RESPONSE TO MOTION FOR EXPEDITED CONSIDERATION AND APPROVAL  
OF COMPLIANCE TARIFF SHEETS TO IMPLEMENT CRITICAL NEEDS  
PROGRAM PILOT ON LESS THAN THIRTY DAYS' NOTICE**

COMES NOW the Office of the Public Counsel (“OPC”) and for its *Response to Motion for Expedited Consideration and Approval of Compliance Tariff Sheets to Implement Critical needs Program Pilot on Less than Thirty Days' Notice*, states as follows:

1. On February 24, 2023, Union Electric Company d/b/a Ameren Missouri (“Ameren”) filed tariff sheets for the Critical Needs Program, which Ameren Missouri agreed to develop with the parties.
2. On February 27, 2023, the Commission issued an *Order Directing an Expedited Tariff Recommendation and Setting Time for Responses* that required, among other things, that “[a]ny other responses to the Critical Needs Program tariff sheets shall be filed no later than February 28, 2023.”
3. Pursuant to this *Order*, the OPC responds to Ameren’s *Motion*.
4. The Commission should approve the compliance tariff sheets to implement Ameren’s critical needs program pilot and should further do so with less than thirty (30) days’ notice.

5. This compliance tariff was developed with stakeholder input and serves to implement a critical needs program as set forth in the testimony of the OPC's witness Dr. Geoff Marke in this case.

6. This program will benefit Ameren's ratepayers and serve to protect those customers with serious illness – or who require the use of life-support equipment – whose condition would be seriously impaired due to a loss of service.

7. Expedient approval of this tariff will speed the implementation of these measures, and thus, the ability of this program to protect customers.

8. Therefore, the OPC requests the Commission approve Ameren's *Motion for Expedited Consideration and Approval of Compliance Tariff Sheets to Implement Critical needs Program Pilot on Less than Thirty Days' Notice*.

WHEREFORE, the Office of the Public Counsel respectfully requests the Commission approve Ameren's *Motion for Expedited Consideration and Approval of Compliance Tariff Sheets to Implement Critical needs Program Pilot on Less than Thirty Days' Notice*.

Respectfully submitted,

By:           /s/ John Clizer            
John Clizer (#69043)  
Senior Counsel  
Missouri Office of the Public  
Counsel  
P.O. Box 2230  
Jefferson City, MO 65102  
Telephone: (573) 751-5324  
Facsimile: (573) 751-5562  
E-mail: [john.clizer@opc.mo.gov](mailto:john.clizer@opc.mo.gov)

CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this twenty-eight day of February, 2023.

/s/ John Clizer