BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Ameren Missouri's 2020 Utility)	
Resource Filing Pursuant to 20 CSR 4240 – Chapter 22)	File No. EO-2020-0021

REQUEST FOR WAIVER OF 60-DAY REQUIREMENT

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), and for its *Request for Waiver of 60-Day Requirement* ("Request for Waiver"), states as follows:

- 1. 20 CSR 4240-22.080(1) requires electrical corporations subject to the Commission's jurisdiction to make triennial compliance filings under Chapter 22 (Electric Utility Resource Planning) of the Missouri Public Service Commission's ("Commission") rules. Ameren Missouri's triennial integrated resource planning ("IRP") compliance filing is due October 1, 2020. Accordingly, on July 30, 2020, the Company submitted its Notice of Case Filing ("Notice"), stating that Ameren Missouri would make its IRP compliance filing on October 1, 2020. Ameren Missouri noted in that filing that the issues likely to be before the Commission "are those outlined in 20 CSR 4240-22.080(16), which specifies the requirements for the Commission's order that will resolve the triennial compliance filing docket."
- 2. Subsequently, the Company elected to submit its IRP filing on September 27, 2020, or one day earlier than the noticed submission date. The issues likely to be before the Commission remain unchanged; only the time frame for the submission of the IRP compliance filing has been amended.
- 3. Pursuant to 20 CSR 4240-4.017(1)(D), waivers of the 60-day notice requirement may be granted for good cause shown. The rule further provides that good cause includes "a verified declaration from the filing party that it has had no communication with the office of the

commission within the prior one hundred fifty (150) days regarding any substantive issue likely to be in the case..."¹

4. As indicated in the declaration attached as Exhibit A, Ameren Missouri has had no communications with the office of the Commission (as defined by 20 CSR 4240-4.015(10)) regarding any substantive issue likely to be in this case during the preceding 150 days. Accordingly, Ameren Missouri has established good cause for a waiver from the 60-day requirement of 20 CSR 4240-4.017(1).

WHEREFORE, Ameren Missouri respectfully submits its Request for Waiver of 60-Day Requirement, and requests that the 60-day requirement for this notice be waived given these particular circumstances.

Respectfully submitted,

\s\ Wendy K. Tatro

Wendy K. Tatro, Mo Bar #60261 Director & Assistant General Counsel Ameren Missouri 1901 Chouteau Avenue, MC 1310 St. Louis, MO 63103 (314) 554-3484 (phone) (314) 554-4014 (fax) AmerenMOService@ameren.com

James B. Lowery, Mo. Bar #40503 SMITH LEWIS, LLP P.O. Box 918 Columbia, MO 65205-0918 (T) 573-443-3141 (F) 573-442-6686 lowery@smithlewis.com

Attorneys for Union Electric Company d/b/a Ameren Missouri

_

¹ Pursuant to the Commission's *Order Waiving 60-Day Notice Requirement* issued on August 1, 2017, in File No. WM-2018-0023, this examples of good cause provided in the rule are not exclusive, and the Commission may find that good cause has been established by other circumstances.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Request was served on the parties of record in this case via electronic mail (e-mail) on this 27th day of September, 2020.

/s/ Wendy Tatro	
Wendy Tatro	

DECLARATION

The undersigned, under penalty of perjury, declares that the Company has had no communication with the office of the commission within the prior one hundred fifty (150) days regarding any substantive issued likely to be in the case

/s/ Warren Wood

Warren Wood, Vice-President Legislative and Regulatory Affairs Union Electric Company d/b/a Ameren Missouri