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

In the Matter of the Application of Union	)	File No. ET-2021-0082
Electric Company d/b/a Ameren Missouri	)	
for Approval of its Surge Protection Program.	)	

## AMEREN MISSOURI'S RESPONSE TO STAFF RECOMMENDATION

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), and for its response to the Staff Recommendation filed in this docket on November 10, 2020, states as follows:

- 1. The Company filed its Application and the related Surge Protection Program tariff sheets ("Tariff") on September 21, 2020. The Tariff bears an effective date of December 20, 2020. The Staff, as required by the Commission, filed its Recommendation on November 10, 2020.
- 2. In its Recommendation, the Staff recommends the Commission deny approval of the proposed Surge Protection Program (the "Program") and the Tariff. Consequently, it appears clear that a determination of the merits of the respective positions of the Company and the Staff will require establishment of a procedural schedule and, if the case cannot otherwise be resolved, an evidentiary hearing.
- 3. Ameren Missouri intends to reach out to the Staff and the Office of the Public Counsel ("OPC") (the only parties to this docket) to discuss developing a procedural schedule to complete the processing of this case. Given the upcoming holidays, Ameren Missouri would expect those discussion to occur the first week of December. Ameren Missouri suggests it (or the parties collectively) make a further filing respecting the further processing of this case by December 15, 2020. After those discussions with the parties but before the Tariff effective date, Ameren Missouri will also extend the effective date of the Tariff beyond December 20, 2020 so

that the Program and the Tariff can be assessed by the Commission on the merits pursuant to a tobe-adopted procedural schedule.

WHEREFORE, the Company respectfully requests that the Commission take no action on the Staff Recommendation, pending further discussions among the parties regarding a procedural schedule, and that it require the parties to file a proposed procedural schedule or other filing respecting the further processing of this case by December 15, 2020.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the Staff of the Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 20th day of November, 2020.

/s/ James B. Lowery
James B. Lowery