BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Establishment of a)	
Working Case for the Review and)	
Consideration of a Rewrite of the)	File No. AW-2018-0385
Existing Electric and Gas Promotional)	
Practices Rule Into One Rule.)	

ADDITIONAL COMMENTS

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), and for its Comments provided in response to the Missouri Public Service Commission's ("Commission") *Request for Additional Comments and Notice of Workshop* issued January 30, 2020, states as follows:

1. Ameren Missouri retains the position expressed in its original comments submitted in this docket that the promotion of energy efficiency measures should be excluded from the promotional practices rules. This is a waiver that is consistently requested with the filing of various energy efficiency programs, and is at the point where the variance should become, in fact, be made a permanent aspect of the rule.

2. After examining the active discussions presented at the January 21, 2020, workshop, Ameren Missouri also states that it supports the positions stated by the Evergy Companies and Spire. Common sense regulations, including freedom regarding an appropriate cost-effectiveness test, are appropriate when it comes to promotional practices rules. By the same token, the Company opposes the position taken by the Office of Public Counsel ("OPC"). Prudently incurred utility expenses, regardless of the basis for the expenditure, should be recoverable from that utility's customers.

Respectfully submitted,

UNION ELECTRIC COMPANY, d/b/a Ameren Missouri

<u>|s| Paula N. Johnson</u>

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CERTICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to the parties of record on this 20th day of March, 2020.

<u>|s| Paula N. Johnson____</u>

Paula N. Johnson