

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri for a Variance from)
Portions of Its Tariffs Related to the New Start) File No. EE-2025-
Energy Relief Program and the Weatherization)
Assistance Program.)

MOTION FOR EXPEDITED TREATMENT AND REQUEST FOR VARIANCES

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "the Company"), and pursuant to 20 CSR 4240-4.017, submits this *Motion for Expedited Treatment and Request for Variances* ("*Request for Variances*") which would relieve the Company from the 60-day notice requirement of 20 CSR 4240-4.017(1)(D), and facilitate the Company's proposal to fully execute actions intended to lessen burdens of customers in its service territory created by the May 16, 2025, tornados and severe storms. In support of its position, Ameren Missouri states as follows:

INTRODUCTION

1. On May 16, 2025, severe weather with strong winds, hail, and an EF-3 tornado caused extensive damage and customer outages across Ameren Missouri's service territory. In the St. Louis metropolitan area, the tornado reached wind speeds of 150 miles per hour and cut a 23-mile path through Missouri and Illinois, resulting in multiple fatalities, damage to a reported 5,000 homes, significant tree damage, blocked roadways, and collapsed buildings. An estimated 134,000 Ameren Missouri customers found themselves without power. Ameren Missouri's first priority was to safely restore power to our customers, but it was not our only priority. We are aware that there will be financial implications for our customers, and we have been developing options to assist them through these difficult times. In particular, Ameren Missouri is:

- Establishing a process to identify impacted customers to support:
 - Pausing collection processes at the appropriate time;
 - Pausing disconnections for non-payment for 60 days;¹
 - Assessing no up-front deposits for new service for 90 days;
 - Modifying special circumstance payment arrangements for the next 90 days to require only 20% down with a 12-month term;
 - Donating \$225,000 to the Dollar More energy assistance program;
 - Allowing Ameren Missouri funding of the Weatherization Assistance Program to weatherize homes impacted by the May 16th storm even if they have been weatherized within the last 15 years;² and
 - Implementing the planned revisions to the New Start Energy Relief Program sooner than anticipated.

Most of these actions are neither dependent on nor prohibited by federal or Missouri laws, Commission regulations or orders, or Ameren Missouri's tariffs. However, the final bullet point does impact a program that is established and governed by tariffs Ameren Missouri currently has in place and that will be revised on June 1st with the implementation of compliance tariffs approved in File No. ER-2024-0319.

2. Ameren Missouri asks the Commission, through this *Request for Variances*, to expedite the implementation of this program in order to accommodate its customers' needs as quickly as possible.

3. In support of its position, Ameren Missouri provides the following information.

¹ Disconnection notices will still be issued because they are necessary for customers to receive certain types of assistance, but Ameren Missouri does not intend to act on those notices for storm-impacted customers during the 60-day period.

² 42 USC 6865 (c)(2) is the federal law that restricts homes from receiving additional weatherization assistance within 15 years of prior financial weatherization assistance. However, it also states that, "[t]his paragraph does not preclude dwelling units that have received previous weatherization ... from receiving non-Federal assistance for weatherization."

MOTION FOR EXPEDITED TREATMENT

4. Ameren Missouri requests expected treatment of this *Request for Variances* pursuant to 20 CSR 4240-2.080(14). This *Request for Variances* was submitted as soon as possible after Ameren Missouri finalized relief plans for its customers and completed its legal and tariff analysis to determine what variances may be necessary. Ameren Missouri requests approval no later than May 28, 2025, at the Commission's next agenda session, so it may begin actively offering these programs to its customers impacted by the May 16th storms as described below.

REQUESTED VARIANCES

5. 20 CSR 4240-4.017(D) allows a variance from the 60-day notice requirement for good cause shown. 20 CSR 4240-2.060(4)(B) requires a utility to set out, among other things, the good cause for the granting of a variance or waiver. The good cause for each of these requested variances is discussed in more detail below.

A. 60-Day Notice Requirement

6. Ameren Missouri requests a variance from the 60-day notice requirement of 20 CSR 4240-4.017, which states, in relevant part:

Any person that intends to file a case shall file a notice with the secretary of the commission a minimum of sixty (60) days prior to filing such case...

Pursuant to 20 CSR 4240-4.017(1)(D), waivers of the 60-day notice requirement may be granted for good cause shown. Ameren Missouri has conducted discussions with certain members of the office of the Commission regarding its plans on behalf of its customers within the 150-day window allowed by the regulation. Those discussions were part of a more overarching disclosure of operational and customer-focused actions Ameren Missouri has undertaken in light of its tornado recovery and restoration efforts. Those discussions were conducted during a meeting on May 22, 2025, with Chair Hahn, as well as her advisors and

members of the Commission's communications team and Consumer Services. On May 23, 2025, Ameren Missouri spoke Commissioner Coleman by phone regarding the same topics. These discussions were not intended to persuade the Commissioners or influence their decisions regarding this variance request in any way. Rather, these discussions were undertaken strictly to provide assurance that Ameren Missouri was taking appropriate and thoughtful actions in the aftermath of the tornado and severe storms that included, among other things, customer-focused relief efforts. Because Ameren Missouri could not know 60 days ago that our customers could have been impacted in such a manner by this weather event, it could not have submitted the notice required by Commission regulation. The May 16th tornado and severe storms, and communications necessary for the prioritization of operational and customer-focused actions of the Company, clearly qualify as "good cause shown" under the regulation, and waiver of the 60-day requirement should be allowed given the extenuating circumstances. No other public utility will be affected by granting the Company a waiver from this requirement.

B. Variance Allowing Early Implementation of New Start Energy Relief Program Changes in June 1st Tariffs

7. Ameren Missouri requests a variance from its existing New Start Energy Relief Program in a manner that would implement the tariff approved in ER-2025-0319 early because its eligibility requirements and funding are more favorable given current customer needs.³ The variance affects Electric Tariff Sheet Nos. 157 and 158, Pilots, Variances, and Promotional Practices, A. Rehousing Low-income Pilot Program. The language revisions requested, consistent with the approved tariff language that will become effective June 1st, is shown in underline and strikethrough format below:

³ If the Commission is unable to address this *Request for Variances* before June 1, 2025, Ameren Missouri understands that this variance request will become moot.

ELIGIBILITY

The Program shall be available to all residential customers who have received service under or qualify for any of the rate options contained in the Company's Service Classification 1(M) Residential rate and who have been homeless or spent time in a homeless shelter in the past year, including domestic violence shelters, or seniors with past due balances and who are threatened with losing public housing as identified by a Rehousing Agency.

8. Good cause is shown for these variances because it will help ease financial constraints the May 16th storms have caused for Ameren Missouri's customers. Because only Ameren Missouri's customers are impacted by this variance, no other utility should be affected.

WHEREFORE, Ameren Missouri respectfully requests that the Commission grant the requested variance of the relevant portions of its tariffs cited above, as well as the 60-day notice requirement of 20 CSR 4240-4.017.

Respectfully submitted,

/s/ Paula N. Johnson

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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 on this via electronic mail (e-mail) on this 23rd day of May, 2025.

/s/ Paula N. Johnson _____

Paula N. Johnson