

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

Application of Union Electric Company	)	
d/b/a Ameren Missouri for Approval of a	)	
Variance Regarding the Timing of Its	)	
Monthly Filings Required by 20 CSR 4240-	)	File No. EE-2025-
3.190(3)(A)4-6 Under the Monthly	)	
Generation Report.	)	

**NOTICE OF CASE FILING AND REQUEST FOR VARIANCE**

**COMES NOW** Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and for its *Notice of Case Filing and Request for Variance* (“*Request for Variance*”), states as follows:

**INTRODUCTION**

1. Pursuant to 20 CSR 4240-3.190(3)(A)4-6 utilities must submit monthly generation reports. New reporting requirements went into effect on April 1, 2025. While Ameren Missouri will continue to file its monthly generation reports under the requirements of 20 CSR 4240-3.190, the Company requires additional time to set up a system to track the information under 20 CSR 4240-3.190(3)(A)4-6 and requires a variance from filing this specific information until such time a tracking system is in place. Ameren Missouri will file supplemental reports with the new information from April 2025 as required and as soon as it is available.

2. As it has in the past, Ameren Missouri will file its Monthly Generation report. While the additional requirements under the new rule are due May 31, Ameren Missouri will need additional time to develop an internal system to track the more detailed generation information under 20 CSR 4240-3.190(3)(A)4-6. Accordingly, Ameren Missouri submits this *Request for Variance*, which is organized as follows:

- I. Waiver of 60-day Requirement
- II. Request to Submit Requirements under 20 CSR 4240-3.190(3)(A)4-6 as soon as the tracking system is completed.

### **I. Waiver of 60-day Requirement**

3. In order to submit this *Request for Variance*, 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. 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 ..."<sup>1</sup> As indicated in the Affidavit 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 regarding this *Request for Variance* 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). No other public utility will be affected by granting the Company a waiver from this requirement.

### **II. Request for Variance**

4. As provided for in 20 CSR 4240-3.190(11) the Company requests that the Commission approve this *Request for Variance* since the information required by 20 CSR 4240-

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<sup>1</sup> Pursuant to the Commission's *Order Waiving 60-Day Notice Requirement* issued on August 1, 2017, in File No. WM-2018-0023, the 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.

3.190(3)(A)4-6 is technically required to be filed monthly, beginning in April 2025. Ameren Missouri requires additional time track the information and prepare each monthly filing. There will be no harm on the Company's customers or the general public in approving this *Request for Variance*.

5. As previously noted, pursuant to 20 CSR 4240-3.190(3)(A)4-6, Ameren Missouri is required to submit additional generation information on a monthly basis beginning April 2025. Ameren Missouri is working a building a tracking system in order to provide the new information required under the revised rules. Once the tracking system is in place, Ameren Missouri will supplement its Monthly Generation Reports from April 2025 with the requested information. No customer or other public utility will be affected by the grant of this variance.

#### **CONCLUSION**

6. For these reasons stated above, Ameren Missouri has established good cause for a waiver from the 60-day requirement of 20 CSR 4240-4.017(1) and for a variance of 20 CSR 4240-3.190(3)(A)4-6 until such time the tracking system is in place. The Company will supplement its monthly generation report with the requested information beginning with the information from April 2025.

**WHEREFORE**, Ameren Missouri respectfully requests a waiver of the 60-day notice requirement and requests a variance allowing it to submit late filed information beginning April 2025 as required under 20 CSR 4240-3.190(3)(A)4-6.

Respectfully submitted,

**UNION ELECTRIC COMPANY,  
d/b/a Ameren Missouri**

/s/ Jennifer S. Moore

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Senior Corporate Counsel

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**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 29<sup>th</sup> day of May, 2025.

/s/ Jennifer S. Moore  
Jennifer S. Moore

Application of Union Electric Company d/b/a )  
Ameren Missouri for Approval of a Variance ) File No. EE-2025-  
Regarding the Timing of Its Monthly Filings )  
Required by 20 CSR 4240-3.190(3)(A)4-6 )  
Under the Monthly Generation Report. )

**STATE OF MISSOURI            )**  
**) ss**  
**CITY OF ST. LOUIS          )**

1. My name is Ryan M. Arnold. I work in the City of St. Louis, Missouri, and I am employed by Union Electric Company d/b/a Ameren Missouri as the Vice President of Power Operations and Energy Trading.

3. I have read the *Notice of Case Filing and Request for Variance*, and I declare under the penalty of perjury that the information contained therein is true and correct to the best of my knowledge and belief.

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