

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri for) **File No. ET-2021-0082**
Approval of its Surge Protection Program) Tariff No. YE-2021-0081

ORDER AND NOTICE

Issue Date: September 22, 2020

Effective Date: September 22, 2020

On September 21, 2020, Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) filed an application for approval of a Surge Protection Program. Contemporaneously therewith, Ameren Missouri filed an implementing tariff, which bears an effective date of December 20, 2020.

The Commission directs notice of the pending tariff and application, and sets the time for intervention requests.

THE COMMISSION ORDERS THAT:

1. The Commission's Data Center shall serve this notice and order on the county commission for each county in the Missouri service territory of Ameren Missouri.
2. The Commission's Public Policy and Outreach department shall make this notice and order available to the members of the Missouri General Assembly whose districts include any county in the Missouri service territory of Ameren Missouri, and to media serving any county in the Missouri service territory of Ameren Missouri.
3. Any application for intervention shall be filed no later than October 7, 2020. Any such filing shall be delivered to:

Secretary
Missouri Public Service Commission
Post Office Box 360
Jefferson City, Missouri 65102

or transmitted through the Commission's electronic filing and information service.

4. This order shall be effective when issued.



BY THE COMMISSION

A handwritten signature in dark ink that reads "Morris L. Woodruff".

Morris L. Woodruff
Secretary

Ronald D. Pridgin, Regulatory Law Judge,
by delegation of authority pursuant
to Section 386.240, RSMo 2016.

Dated at Jefferson City, Missouri,
on this 22nd day of September, 2020.

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

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

APPLICATION AND REQUEST FOR WAIVER

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") pursuant to Section 393.140(11), RSMo. (2019) and 20 CSR 4240-2.060, and for its Application seeking approval of a new tariffed program to provide customers the option to obtain protection from electrical surges that could otherwise enter a customer's electric meter (the "Surge Protection Program," or "Program"), states as follows:

A. Applicant

1. Applicant is a Missouri corporation doing business under the fictitious name of Ameren Missouri, in good standing in all respects, with its principal office and place of business located at 1901 Chouteau Ave., St. Louis, Missouri 63103. Applicant is engaged in providing electric utility services in portions of Missouri as a public utility under the jurisdiction of the Commission. Applicant previously submitted to the Commission a certified copy of its Articles of Incorporation (see File No. EA-87-105), as well as its Fictitious Name Registration (see File No. EN-2011-0069), both as filed with the Missouri Secretary of State's Office, which documents are incorporated by reference and made a part hereof for all purposes. A certified copy of Applicant's Certificate of Corporate Good Standing is attached hereto as Exhibit A and made a part hereof for all purposes.

2. Communications regarding this Application should be addressed to the undersigned counsel and to:

Thomas M. Byrne
Senior Director Regulatory Affairs
Ameren Missouri
1901 Chouteau Avenue
PO Box 66149
St. Louis, MO 63166-6149
(314) 554-2514
tbyrne@ameren.com

3. Other than cases that are docketed at the Commission, Ameren Missouri has no pending actions or final unsatisfied judgments or decisions against it from any state or federal court or agency within the past three years which involve customer service or rates. Ameren Missouri has no overdue annual report or assessment fees.

B. The Proposed Surge Protection Program

4. Concurrently with the filing of this Application, Ameren Missouri is filing tariff sheets reflecting the terms of the proposed Surge Protection Program. Also filed concurrently with this Application are the direct testimonies of Jared Schneider and Steven M. Wills, who address the following topics:

- a. Mr. Schneider – Background for Surge Protection Program, including a discussion of the principles that underlie it, its need, benefits, and expected operation and financial results;
- b. Mr. Wills – The regulatory policy reasons for proposing the program, including how it reflects an appropriate electric service offering and fits into the Company's affordability goals to the benefit of all customers.

5. As noted above, the Program is designed to provide customers with the option to obtain protection, backed by a 15-year manufacturer's warranty, from electrical surges (one of the most common sources of such a surge is from lightning) that could otherwise enter their residence through the electric meter and result in damage to common household appliances, despite the significant measures taken by the Company on its electric system to prevent surges and otherwise minimize their impact. The Program is a cost-effective means of offering such protection both to

the benefit of Program participants who will pay for the protection, and ultimately to the general body of customers as Program revenues exceed Program costs, resulting in a lower revenue requirement and ultimately lower electric rates for all customers. Programs like the Surge Protection Program provide a means to enhance the Company's electric service offerings while generating incremental revenues to help keep customer rates as affordable as possible for all.

6. The Program is straightforward. Participating customers will pay a monthly fee of \$9.95 and in exchange the Company will install a surge protection device in the customer's electric meter box that is designed to protect electrical devices from voltage surges and spikes.¹ The device will be backed by the manufacturer's 15-year warranty and provide coverage of up to \$5,000 per covered appliance, \$5,000 per occurrence, and \$50,000 in the aggregate over the 15-year life of the device. It will cover HVAC units, refrigerators, clothes washers and dryers, dishwashers, freezers, hard wired fans, and cooking appliances.

C. Request for Waiver

7. 20 CSR 4240-4.017(1) generally requires that a notice be filed with the Commission at least 60 days prior to the filing of a case. The subject rule also provides for, and contemplates, that the Commission may waive the 60-day notice requirement for good cause shown and expressly provides that good cause is established if the filing party provides "a verified declaration . . . that it 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" Such a declaration is included with this Application, below. Consequently, good cause exists to waive the 60-day notice requirement.

¹ The investment in the device will be recorded to plant-in-service in Account No. 370, and in this particular instance, the Company will assign a subaccount (Account No. 370-xxx) for the collar investment to keep track of that investment for managerial accounting purposes.

WHEREFORE, the Company respectfully requests the Commission approve the tariff sheets filed with this Application for the Surge Protection Program and grant its request for a waiver of the 60-day notice requirement of 20 CSR 4240-4.017(1) for good cause shown.

Respectfully submitted,

/s/ James B. Lowery

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**ATTORNEYS FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

DECLARATION

The undersigned, under penalty of perjury, declares that the foregoing *Application* is true and correct to the best of his knowledge and belief.

This request is substantially consistent with the preferred resource plan specified in the most recent triennial compliance filing made by Ameren Missouri. 20 CSR 4240-22.080(18).

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

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 21st day of September, 2020.

/s/ *James B. Lowery*
James B. Lowery

STATE OF MISSOURI



John R. Ashcroft
Secretary of State

CORPORATION DIVISION
CERTIFICATE OF GOOD STANDING

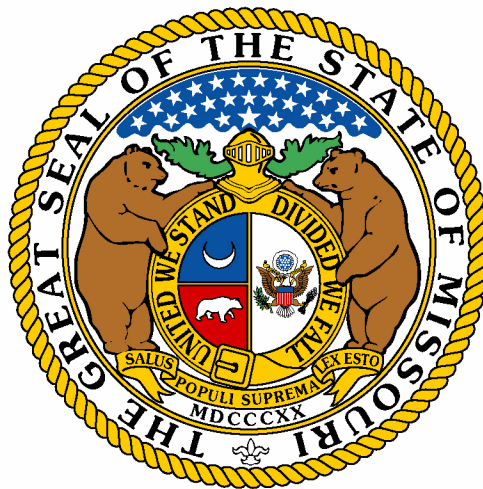
I, JOHN R. ASHCROFT, Secretary of State of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

UNION ELECTRIC COMPANY
00040441

was created under the laws of this State on the 21st day of November, 1922, and is in good standing, having fully complied with all requirements of this office.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 21st day of May, 2020.


Secretary of State



Certification Number: CERT-05212020-0075

STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 22nd day of September, 2020.




Morris L. Woodruff
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

September 22, 2020

File/Case No. ET-2021-0082

Missouri Public Service Commission

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staffcounsel@psc.mo.gov

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Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).

Sincerely,



**Morris L. Woodruff
Secretary**

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.