

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

|  |   |                                     |
|--|---|-------------------------------------|
| In the Matter of Union Electric Company  | ) |                                     |
| d/b/a Ameren Missouri's Filing to Change | ) | <b><u>File No. ET-2014-0076</u></b> |
| Criteria for Assessment of New Customer  | ) |                                     |
| Deposits                                 | ) |                                     |

**STAFF RECOMMENDATION**

**COMES NOW**, the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and for its *Staff Recommendation* regarding Union Electric Company, d/b/a Ameren Missouri's ("Ameren Missouri" or "Company") Request for Variance, states as follows:

1. On April 2, 2014, the Missouri Public Service Commission ("Commission") approved a *Unanimous Stipulation and Agreement* ("Agreement") filed on March 26, 2014, in its *Order Approving Stipulation and Agreement and Approving Tariffs*. In Paragraph 6 of the Agreement, Ameren Missouri agreed to provide the following on a quarterly basis for as long as its deposit collection program for new customers is designated as experimental:

(1) The number of customer applications for new residential service made to Ameren Missouri, (2) the number of those applications that result in a requirement for a deposit due to the result of an EAER Score,<sup>1</sup> and (3) the amount of each deposit required.

2. On July 18, 2025, Ameren Missouri filed a *Request for Variance* seeking approval to file the above quarterly reporting out of time. The request also indicates Ameren Missouri's intent to continue timely filing until it can seek removal of the experimental designation in a future rate case.

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<sup>1</sup> Equifax Advanced Energy Risk Score.

3. On the same day, the Commission ordered Staff to provide a recommendation on the request no later than August 1, 2025.

4. Staff has reviewed Ameren Missouri's requested variance to the Agreement and has no objection to the Commission granting the variance to allow late-filed reports.

**WHEREFORE**, Staff respectfully recommends the Commission approve Ameren Missouri's Request for Variance and to grant such other and further relief as the Commission considers just and reasonable in the circumstance.

Respectfully submitted,

**/s/ Tracy D. Johnson**

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**/s/ Netanya Buban**

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**Attorneys for the Staff of the  
Missouri Public Service Commission**

### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, postage prepaid, to the parties of record as listed in the Service List maintained for this case by the Commission's Data Center, on this 1<sup>st</sup> day of August, 2025.

**/s/ Tracy D. Johnson**