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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

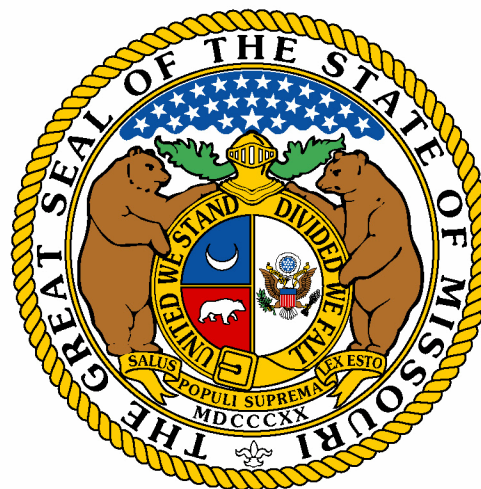
I, JOHN R. ASHCROFT, Secretary of State of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

UNION ELECTRIC COMPANY
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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