

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

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| In the Matter of the Determination of Special |) | |
| Contemporary Resource Planning Issues to |) | |
| Be Addressed by Ameren Missouri in its |) | File No. EO-2020-0047 |
| Next Triennial Compliance Filing or Next |) | |
| Annual Update Report. |) | |

AMEREN MISSOURI'S MOTION FOR EXTENSION OF TIME TO RESPOND

Comes now Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "the Company") and submits this *Motion for Extension of Time to Respond* ("Motion"), requesting additional time to respond to the comments submitted in this case by the Staff of the Missouri Public Service Commission ("Staff" and "Commission" respectively), the Office of the Public Counsel ("OPC"), Natural Resource Defense Council ("NRDC"), and the Sierra Club. In support of this *Motion to Extend*, Ameren Missouri states as follows:

1. On August 23, 2019, the Commission issued its *Order Opening a File Regarding Special Contemporary Resource Planning Issues and Offering an Opportunity to File Suggestions* ("Order"). This *Order* provided that by September 15, 2019, Staff, the Office of Public Counsel ("OPC"), and other interested parties may file suggested issues for consideration.¹ The *Order* then noted that Ameren Missouri has until October 1 to file comments regarding the suggested issues.²

2. On September 13, 2019, NRDC and Sierra Club submitted proposed Special Contemporary Issues ("SCI") in this case, and on September 16, 2016 Staff and OPC submitted additional proposed SCI. Collectively, these four parties have proposed 22 distinct (some of which involve a number of additional sub-issues) SCI across many, if not most, of the major operations

¹ 20 CSR 4240-22.080(4)(A).

² 20 CSR 4240-22.080(4)(B).

of the Company, including traditional baseload generation, demand-side management, distributed energy resources, transmission and distribution, renewables, finance, and many other topics.

3. The Commission's rule regarding integrated resource planning filing requirements provides that, "The Commission may extend or reduce any of the time periods specified in this rule for good cause shown."³ Two Ameren Missouri personnel involved in the drafting and submission of the response are traveling and unavailable during various portions of the time leading up to the response: a subject matter expert has been traveling since September 5 and is not returning until to the office until September 24, at which point counsel is leaving and will not return until September 30, 2019. This leaves insufficient time to appropriately coordinate the compilation, review, and preparation for filing of a full response to these proposed SCIs. Given the number and complexity of the proposed SCIs, additional time will be required to provide the Commission with a meaningful response. Allowing an additional two weeks, until October 15, will allow the Company to provide a more helpful and complete record to inform the Commission's order ultimately issued in this proceeding. Ameren Missouri suggests a similar extension for the issuance of the Commission's order resulting from this proceeding.⁴ This requested extension will only apply to Ameren Missouri's proceeding and resulting 2020 triennial IRP filing, which is not due to be submitted until October 1, 2020, which will leave plenty of time for Ameren Missouri to take account of any SCIs that the Commission determined should be examined in that filing. Therefore no one should be harmed by the grant of this extension.

³ 20 CSR 4240-22.080(15).

⁴ 20 CSR 4240-22.080(4)(C).

WHEREFORE, for the reasons set forth above, Ameren Missouri respectfully requests that the Commission grant the requested two-week extension.

Respectfully submitted,

By: /s/ Paula N. Johnson-----

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**ATTORNEY FOR UNION ELECTRIC
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CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the parties and/or counsel of record this 19th day of September, 2019.

/s/ Paula N. Johnson

Paula N. Johnson