

**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-2018-0063**
Approval of 2017 Green Tariff) Tracking No. YE-2018-0064

**JOINT MOTION FOR EXTENSION
OF TIME TO FILE RECOMMENDATIONS**

COME NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), the Staff of the Missouri Public Service Commission (“Staff”), the Office of the Public Counsel (“OPC”), the Missouri Department of Economic Development – Division of Energy (“DE”), Wal-Mart Stores, Inc. (“Wal-Mart”), the Missouri Industrial Energy Consumers (“MIEC”), Wind on the Wires (“WOW”), the Natural Resources Defense Council (“NRDC”), the Sierra Club (“Sierra Club”), Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”), Kansas City Power & Light Company (“KCP&L”), and KCPL – Greater Missouri Operations Company (“KCPL-GMO”) (collectively, “Movants”), and hereby request that the Commission grant the Staff and interested parties an extension of time to March 26, 2018, to file recommendations or comments regarding Ameren Missouri’s application and associated tariff filing. In support, Movants state as follows:

1. On November 27, 2017, Ameren Missouri filed an application requesting the Commission approve a tariff authorizing its Renewable Choice Program, which is a new service in which qualifying customers can elect to participate in a subscription-based renewable energy program. The same day the Commission issued its *Notice of Tariff Filing And Order Establishing Time to Intervene and File Recommendations* directing the Staff, and any interested party, to file recommendations regarding the application and tariff no later than January 5, 2018.

2. On January 4, 2018, the Company and the Staff filed a joint motion seeking an extension of time to February 5, 2018, for Staff to file its recommendation and an extension of

time for other parties to file comments on the Company's filing. That joint motion was granted by the Commission on January 5, 2018. Thereafter, the Company extended the effective date of the tariff sheets at issue in this case to February 24, 2018.

3. On February 5, 2018, the parties to this docket filed a joint motion seeking an extension of time to February 26, 2018, for Staff to file its recommendation and an extension of time for other parties to file comments on the Company's filing. That joint motion was granted by the Commission on February 5, 2018. Thereafter, the Company extended the effective date of the tariff sheets at issue in this case to March 26, 2018.

4. All the parties have been engaged in, and continue to be engaged in, productive discussions regarding the issues raised by the Company's application in this case. Most recently, all parties met to discuss the terms of a possible total or partial resolution of this docket on February 15, 2018 and an additional meeting is being planned for the week of February 26, 2018.

5. As a result of these recent and planned discussions, Movants agree that more time is needed to continue their discussions in an effort to resolve this docket prior to the Staff filing a recommendation, and prior to interested parties filing comments if they desire to do so. Based on the progress of current discussions, the parties continue to believe it may be possible to agree upon a stipulation and agreement resolving some or all the issues in this docket. Accordingly, Movants agreed to request an extension of time to March 26, 2018 for the filing of a Staff recommendation and any comments other parties desire to file, a stipulation and agreement, or an additional filing respecting the further processing of the Company's application. As well, Ameren Missouri will further extend the effective date of its tariff an additional 30 days from March 26, 2018 to April 25, 2018.

WHEREFORE, Movants pray the Commission grant the Staff an extension of time to file its recommendation, and for any other party desiring to do so to file comments, no later than March 26, 2018.

/s/ James B. Lowery

James B. Lowery, Mo. Bar #40503
SMITH LEWIS, LLP
P.O. Box 918
Columbia, MO 65205-0918
(T) 573-443-3141
(F) 573-442-6686
lowery@smithlewis.com

/s/ Wendy K. Tatro

Wendy K. Tatro, Mo. Bar #60261
Director & Assistant General Counsel
Ameren Missouri
1901 Chouteau Avenue, MC 1310
St. Louis, MO 63103
(314) 554-3484 (phone)
(314) 554-4014 (fax)
AmerenMOService@ameren.com

***Attorneys for Union Electric Company
d/b/a Ameren Missouri***

/s/ Lewis R. Mills

Lewis R. Mills, Mo. Bar #35275
Bryan Cave, LLP
221 Bolivar St., Ste. 101
Jefferson City, MO 65101
lewis.mills@bryancave.com

***Attorneys for Midwest Industrial Energy
Consumers***

/s/ Henry B. Robertson

Henry B. Robertson, Mo. Bar #29502
Great Rivers Environmental Law Center
319 N. Fourth St., Suite 800
St. Louis, MO 63102
hrobertson@greatriverslaw.org

***Attorney for Natural Resources Defense Council
and Sierra Club***

/s/ Robert S. Berlin

Robert S. Berlin, Mo. Bar #51709
Deputy Staff Counsel
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
(573) 526-7779 (Telephone)
(573) 751-9285 (Fax)
Bob.berlin@psc.mo.gov (e-mail)

/s/ Nathan Williams

Nathan Williams, Mo. Bar #35512
Chief Deputy Public Counsel
Office of the Public Counsel
P.O. Box 2230
Jefferson City, MO 65102
nathan.williams@ded.mo.gov

Attorney for Office of the Public Counsel

/s/ Marc Poston

Marc Poston, Mo. Bar #45722
Senior Counsel
Department of Economic Development
P.O. Box 1157
Jefferson City, MO 65102
marc.poston@ded.mo.gov

Attorney for Missouri Division of Energy

/s/ Andrew Linhares

Andrew Linhares, Mo. Bar #63973
910 E. Broadway, Ste. 205
Columbia, MO 65201
Andrew@renewmo.org

Attorney for Renew Missouri

/s/ David Woodsmall

David Woodsmall, Mo. Bar #40747
Woodsmall Law Office
308 East High St., Suite 204
Jefferson City, MO 65101
David.woodsmall@woodsmallllaw.com

Attorney for Wal-Mart Stores, Inc.

/s/ Robert J. Hack

Robert J. Hack, MBN 36496
Phone: (816) 556-2791
E-mail: rob.hack@kcpl.com
Roger W. Steiner, MBN 39586
Phone: (816) 556-2314
E-mail: roger.steiner@kcpl.com
Kansas City Power & Light Company
1200 Main – 19th Floor
Kansas City, Missouri 64105
Fax: (816) 556-2110

*Counsel for Kansas City Power & Light
Company and KCP&L Greater Missouri
Operations Company*

/s/Deirdre Kay Hirner

Deirdre Kay Hirner (MO Bar # 66724)
American Wind Energy Association
Midwest Director
2603 Huntleigh Place
Jefferson City, MO 65109
Telephone: 202-412-0130
Email: dhirner@awea.org

Attorney for Wind on the Wires

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically on this 26th day of February, 2018 to counsel for the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ James B. Lowery
James B. Lowery