

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

In the Matter of the Joint Application of)
Union Electric Company, d/b/a Ameren Missouri,)
and Three Rivers Electric Cooperative, Inc.,) File No. EO-2020-0101
for an Order Approving a Territorial Agreement)
in Cole and Osage Counties, Missouri.)

REQUEST FOR WAIVER OF 60-DAY NOTICE EXPIRATION

COME NOW, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), and submits this its *Request for Waiver of 60-day Notice Expiration* ("*Request*") to the Missouri Public Service Commission ("Commission"). In support of its position, Ameren Missouri state as follows:

1. Ameren Missouri and Three Rivers Electric Cooperative ("TREC"), for some time, have been engaged in discussions in order to clarify any ambiguous rights and obligations in areas where their service territories border. On October 9, 2019, after Ameren Missouri and TREC reached an agreement in principle, Ameren Missouri submitted a Notice of Case Filing in the above-captioned case. Pursuant to 20 CSR 4240-4.017(1), a 60-day notice expires after 180 days, or in this case, April 6, 2020. The Company and TREC have been working to finalize their agreement in writing in order to submit it with an application for the Commission's approval. Unfortunately, with the constraints imposed by the COVID-19 pandemic, finalization of the agreement and gathering the documents needed for submission of the application have become unusually difficult.

2. Accordingly, Ameren Missouri requests a variance from the expiration portion of the 60-day notice requirement of 20 CSR 4240-4.017, which states, in relevant part:

If the expected case filing is not made within one hundred eighty (180) days, the noticed case shall close...

Pursuant to 20 CSR 4240-4.017(1)(D), waivers of the 60-day notice requirement may be granted

for good cause shown. Given the extraordinary circumstances presented by the pandemic, Ameren Missouri requests this provision be applied to the expiration of the notice rather than the need to file a 60-day notice. Ameren Missouri anticipates it should take no longer than an additional thirty (30) days to gather the remaining information needed for the submission of the application in this case. Accordingly, Company and Cooperative have established good cause for a waiver from the expiration of the 60-day notice anticipated by 20 CSR 4240-4.017(1). No other public utility will be affected by granting the Company a waiver from this requirement.

WHEREFORE, Ameren Missouri request the Notice of Case Filing be extended for 30 days beyond its current expiration of April 6, 2020, or until May 20, 2020.

Respectfully submitted,

/s/ Paula N. Johnson

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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 on this via electronic mail (e-mail) on this 6th day of April, 2019.

/s/ Paula N. Johnson
Paula N. Johnson