BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Adjustment of Union Electric Company d/b/a Ameren Missouri's Fuel Adjustment Clause for the 40 th Accumulation Period)))	File No. ER-2023-0031 Tariff No. YE-2023-0023
In the Matter of the True-Up of Union Electric Company d/b/a Ameren Missouri's Fuel Adjustment Clause for the 37 th Recovery Period.)))	File No. EO-2023-0032

MOTION FOR EXTENSION

COMES NOW, Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and files this *Motion for Extension of Time to File Staff's Recommendation* respectfully requesting the Missouri Public Service Commission grant its *Motion* extending the date for filing Staff's Recommendation in this proceeding from August 22, 2022 to August 26, 2022. In support of this motion, Staff states as follows:

- 1. On July 29, 2022, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed its tariff sheet proposing a revised fuel adjustment rate and bearing an effective date of October 1, 2022. Also on July 29, 2022, Ameren Missouri initiated a rate adjustment mechanism true-up, to be included in the proposed fuel adjustment rate.
- 2. Staff received Ameren Missouri's responses to Staff's submitted data request on August 19, 2022.
- 3. Commission Rule 20 CSR 4240-20.090(8)(F) states "Within thirty (30) days after the electric utility files its testimony and tariff sheet(s) to adjust its FARs, the staff

shall submit a recommendation regarding its examination and analysis to the commission . . ."

4. Staff requests for a further four (4) days, or until August 26, 2022, to analyze the data request from Ameren Missouri. With this extension, Staff would have a total of 28 days to conduct an accurate analysis of Ameren Missouri's discovery response.

WHEREFORE, Staff respectfully requests an extension until August 26, 2022 to file a recommendation.

Respectfully submitted,

/s/ Eric Vandergriff

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Counsel for the Staff of the Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record on this 22nd day of August, 2022.

/s/ Eric Vandergriff