

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

In the Matter of Ameren Missouri’s 2020)
Utility Resource Filing pursuant to 20 CSR) File No. EO-2021-0021
4240 – Chapter 22.)

AMEREN MISSOURI’S MOTION FOR RECONSIDERATION

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”), and pursuant to 20 CSR 4240-22.080(15), hereby submits to the Missouri Public Service Commission ("Commission") its *Motion for Reconsideration*, specifically, to request additional time to complete and submit the analysis ordered by the Commission on August 18, 2021. In support of its position, Ameren Missouri states as follows:

1. On August 18, 2021, the Commission ordered Ameren Missouri to conduct "detailed analysis comparing ratepayer risks and shareholder risks for additional generation resources, which are not required to meet federal, state, or MISO requirements as part of its next IRP annual update." (the “Ordered Analysis”).

2. Under the Commission's regulations, annual updates are normally due on or around April 1st of each year.¹ Because the Commission, at Ameren Missouri’s Request, moved Ameren Missouri’s triennial filing date to October rather than April,² the annual update was also moved to on or around October 1st of each year so that it would be submitted on each one-year anniversary of the triennial IRP filing, as would be the case under the Commission’s regulations.³

3. Currently, Ameren Missouri is completing analysis for its 2021 annual update. That work, along with the other work required from the planning department, does not leave enough time for the Company to complete the Ordered Analysis by October 1, 2021. Ameren Missouri

¹ 20 CSR 4240-22.080(3).

² 20 CSR 4240-22.080(1).

³ File No. EE-2019-0104.

requests the Commission give the Company until December 15, 2021, to complete and provide the Ordered Analysis.

WHEREFORE, for the reasons set forth above, Ameren Missouri requests the Commission grant this reconsideration request and order a new date of December 15, 2021, for the submission of the Ordered Analysis.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing reply has been served on counsel for parties by electronic mail on this 9th day of September, 2021.

/s/ Wendy Tatro
Wendy K. Tatro