

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri’s 2020 Utility) File No. EO-2021-0021
Resource Filing Pursuant to 20 CSR 4240)
– Chapter 22)

MOTION FOR EXTENSION OF TIME TO FILE COMMENTS

Sierra Club hereby requests that the Commission grant the Missouri Public Service Commission Staff (“Staff”) and interested parties a 14-day extension of time to March 15, 2021 to file recommendations, reports, or comments regarding Union Electric Company d/b/a Ameren Missouri’s (“Ameren Missouri” or “Company”) 2020 Integrated Resource Plan (“IRP”). Counsel for Sierra Club has contacted counsel for all parties in this proceeding regarding this matter. Ameren Missouri, Staff, the Office of Public Counsel (“OPC”), Missouri Department of Natural Resources – Division of Energy (“DE”), Missouri Energy Consumers Group (“MECG”), Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”), Spire Missouri Inc. (“Spire Missouri”) have stated no objection to the motion. Parties in support of the request are Clean Grid Alliance (“CGA”), Dutchtown South Community Corporation (“DSCC”), Missouri Industrial Energy Consumers (“MIEC”), Missouri State Conference of the National Association for the Advancement of Colored People (“Missouri NAACP”), Natural Resources Defense Council (“NRDC”), and New Northside Missionary Baptist Church, Inc. (“NNMBC”). In support of its motion, Sierra Club states the following:

1. On September 27, 2020, Ameren Missouri filed its 2020 IRP, as required by 20 CSR 4240-22, and its Motion for Protective Order.

2. On September 28, 2020, the Commission issued its *Order Directing Notice and Setting Deadline for Intervention Requests* directing the Staff to file its report, and any interested intervening parties to file comments no later than March, 1, 2021.

3. On October 7, 2020, Sierra Club timely filed its Application to Intervene, which was granted by the Commission on October 20, 2020.

4. On November 12, 2020, the Commission granted the Company's Motion for Protective Order, and Sierra Club filed its nondisclosure agreements on November 16, 2020.

5. Commission Rule 20 CSR 4240-22.080(11) provides that all workpapers related to the Company's filing are to be shared with any intervenor for use in its review of the filing within two days of intervenors signing and filing a confidentiality agreement.

6. On January 8, 2021, Ameren Missouri notified parties of its intent to share workpapers related to its IRP through a secure site that it was currently setting up. The workpapers were made available to parties on January 20, 2021.

7. Sierra Club seeks a 14-day extension of time to file comments as more time is needed to review these workpapers, request discovery and receive responses, and evaluate the IRP filing to provide substantive and productive comments. Sierra Club requests a new deadline of March 15, 2021 for Staff's Report and for other parties that intend to file comments, as well as a 14-day extension of any other procedural deadlines that follow.

8. Sierra Club's counsel has conferred with counsel for Staff, Ameren Missouri, and intervenors regarding the requested extension. Ameren Missouri, Staff, OPC, DE, MECG, Renew Missouri, Spire Missouri have indicated that they do not oppose this motion. CGA, DSCC, MIEC, Missouri NAACP, NRDC, and NNMBC support this motion.

Wherefore, Sierra Club respectfully requests that the Commission grant an extension of time to file comments, for any other party desiring to file comments, and for Staff's Report, to March 15, 2021.

Dated: January 28, 2021

/s/ Tony Mendoza

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically on this 28th day of January, 2021 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/ Tony Mendoza
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