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 REQUEST FOR EXTENSION OF TIME

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 request for an extension of time to submit a joint filing and a reply to comments submitted by the stakeholders in this proceeding. In support of its position, Ameren Missouri states as follows:

- 1. On September 27, 2020, Ameren Missouri submitted its 2020 triennial integrated resource planning ("IRP") compliance filing. 20 CSR 4240-22.080(7) provides that the Commission's Staff ("Staff") and other stakeholders have 150 days in which to respond to the IRP filing, or until March 1, 2021. The Commission granted two extensions that moved the date for stakeholder input until March 31, 2021.
- 2. 20 CSR 4240-22.080(9) provides that if Staff, the Office of the Public Counsel ("OPC"), or any intervenor claims there are deficiencies in or concerns with the filed IRP, they will work with the utility and other parties to reach a joint agreement to submit to the Commission within 60 days of comments. 20 CSR 4240-22.080(10) provides that if full agreement on remedying any deficiencies or concerns is not reached, the utility and other stakeholders will have the opportunity to file comments in response to the other stakeholders within 60 days. Originally, these pleadings were due on Friday, May 28, 2021. However, Ameren Missouri requested, and was granted, a two-week extension to submit any joint agreement and response necessary in this

proceeding, as well as for other time periods contained in 20 CSR 4240-22.080. The Commission granted that request, making the deadline for the next filings due in this matter June 11, 2021.

- 3. While the parties have made progress in discussions, there are still a few matters to address and reviews to complete before the next filings in this matter are ready. Ameren Missouri therefore requests an additional week, or until June 18, 2021, in order to submit any joint agreement and response necessary in this proceeding. As before, Ameren Missouri acknowledges that all time periods contained in 20 CSR 4240-22.080 that are tied to the comment date should receive a commensurate one-week delay. Ameren Missouri proffers that continued discussions between the parties to this matter demonstrates good cause for the requested extension, and that a two-week delay for all deadlines tied to the comment date is fair.
- 4. Ameren Missouri has contacted the parties in this proceeding, and none object to the extension.

WHEREFORE, Ameren Missouri requests an additional one-week extension for the submission of the joint agreement and response, until June 18, 2021. Ameren Missouri further requests that all time periods contemplated by 20 CSR 4240-22.080 that are tied to the comment date should likewise be delayed by one week.

Respectfully submitted,

/s/ Paula N. Johnson

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing reply has been served on counsel for Staff and OPC by electronic mail on this 11th day of June, 2021.

/s/ Paula N. Johnson Paula N. Johnson