

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

In the Matter of the Application of Union            )  
Electric Company d/b/a Ameren Missouri            )  
for Permission and Approval and a                 )  
Certificate of Public Convenience and             ) File No.: EA-2022-0244  
Necessity Authorizing it to Construct a         )  
Renewable Generation Facility.                    )

**MOTION FOR FURTHER EXTENSION**

**COMES NOW** Union Electric Company d/b/a Ameren Missouri (“Company” or “Ameren Missouri”), and for its motion seeking a further extension of the deadline to respond to the Staff recommendation filed in this docket, states as follows:

1. Staff filed its Staff Report and Recommendation (“Staff Recommendation”) regarding the certificate of convenience and necessity (“CCN”) application at issue in this docket on December 1, 2022. The Staff Recommendation was to approve the application subject to 10 conditions. Under the above-referenced Commission rule, Ameren Missouri’s response to the Staff Recommendation would have been due on December 12, 2022.

2. Upon the Company’s request, see *Ameren Missouri’s Request for an Extension of the 10-Day Response Deadline in 20 CSR 4240-2.080(13)*, the Commission extended the due date of the Company’s response to today, December 19, 2022.

3. The Company and the Staff have continued to discuss Staff’s recommendation and have reached full agreement on the terms under which Staff is recommending approval of the CCN sought in this case, including on all Staff recommended conditions, except for one issue. The Company and the Staff are continuing to work through that issue but given that the holidays, could be delayed in resolving it.

4. Consequently, the Company requests that the Commission order it to either file by January 6, 2023, a stipulation, a status report, or a response to Staff’s recommendation. While

the Company believes it will likely not take until January 6, 2023, to resolve the remaining issue, given the Holiday Season the Company believes a longer extension is warranted.

5. Counsel for the Staff has indicated that Staff does not oppose this motion.<sup>1</sup>

**WHEREFORE**, Ameren Missouri prays that the Commission make and enter its order extending the deadline for it to respond to the Staff Recommendation, or alternatively file a stipulation or status report, to January 3, 2023.

Respectfully submitted,

/s/ James B. Lowery

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**ATTORNEYS FOR UNION ELECTRIC  
COMPANY d/b/a AMEREN MISSOURI**

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<sup>1</sup> Given the timing, the undersigned counsel has not had an opportunity to confirm the other parties' positions on this motion but believes in good faith that they likely do not oppose, insofar as they did not oppose the prior extension request and have not themselves filed anything in response to Staff's Recommendation.

**CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing was served on counsel for all parties of record in this case on via electronic mail (e-mail) on this 19th day of December, 2022.

*/s/ James B. Lowery*  
James B. Lowery