

**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)

**UNOPPOSED MOTION FOR SECOND EXTENSION OF TIME TO FILE
COMMENTS**

Sierra Club submits this unopposed motion to grant the Missouri Public Service Commission Staff (“Staff”) and interested parties a 16-day extension of time to March 31, 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, Staff, the Office of Public Counsel (“OPC”), Missouri Department of Natural Resources – Division of Energy (“DE”), Spire Missouri Inc. (“Spire Missouri”), and Dutchtown South Community Corporation (“DSCC”) do not oppose the requested extension. Clean Grid Alliance (“CGA”), Natural Resources Defense Council (“NRDC”), Renew Missouri, Missouri Industrial Energy Consumers (“MIEC”), Missouri State Conference of the National Association for the Advancement of Colored People (“Missouri NAACP”), and New Northside Missionary Baptist Church (“NNMBC”) support the requested extension.

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 January 28, 2021, Sierra Club filed an unopposed motion for a 14-day extension of time, until March 15, 2021, to file comments, so that the parties would have adequate time to review Ameren's workpapers, request discovery and receive responses, and evaluate the IRP filing to provide substantive and productive comments.

5. On January 29, 2021, the Commission granted the motion and extended the deadline for all parties to file comments, recommendations, or reports until March 15, 2021.

6. Since then, the parties have continued to engage in discovery. On February 18, 2021, Sierra Club submitted its Second Set of Data Requests to Ameren.

7. Commission Rule 20 CSR 4240-2.090(2)(C)-(D) provides that the party to whom data requests are presented shall answer the requests within 20 days, unless the party objects to the request or is unable to answer within 20 days.

8. On March 1, 2021, Ameren responded to Sierra Club's data requests, objecting in part, but also indicating that the Company will need additional time, until March 18, 2021, to provide a response.

9. To provide Ameren with additional time to respond to already-pending discovery requests, and to provide Sierra Club and the parties adequate time to review any responses, Sierra Club requests a new deadline of March 31, 2021 for Staff's Report and for other parties to file comments, and a corresponding 16-day extension of any other procedural deadlines that follow.

10. Sierra Club's counsel has conferred with counsel for all parties in this proceeding regarding this motion.

11. Ameren Missouri, Staff, the OPC, DE, Spire Missouri., and DSCC do not oppose the requested extension.

12. CGA, NRDC, Renew Missouri, MIEC, Missouri NAACP, and NNMBC support the requested extension.

Accordingly, 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 no later than March 31, 2021.

Dated: March 4, 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 4th day of March, 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
Tony Mendoza