## **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 4240 – Chapter 22.

File No. EO-2021-0021

## AMEREN MISSOURI'S REQUEST FOR EXTENSION OF TIME

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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. The 60<sup>th</sup> day for joint comments and/or a response is therefore May 30, 2021. However, because this date falls on a Sunday, and because the regulation states that these pleadings must be filed "within sixty (60) days," these pleadings are due on Friday, May 28, 2021.

3. Ameren Missouri has engaged in discussions with Staff and the intervenors who filed comments in order to determine what issues can be resolved and what issues will require response.<sup>1</sup> However, many of these discussions remain ongoing. Ameren Missouri therefore requests a two-week extension, or until June 11, 2021, to submit any joint agreement and any response necessary in this proceeding. 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 two-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 that the 60-day time period for a joint filing pursuant to 20 CSR 4240-22.080(9) and for responses pursuant to 20 CSR 4240-22.080(10) be granted, and the time period for submission of these pleadings be extended through June 11, 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 two weeks.

Respectfully submitted,

<u>/s/ Paula N. Johnson</u> **Paula N. Johnson**, #68963 Senior Corporate Counsel **Wendy K. Tatro**, #60261 Director & Assistant General Counsel Ameren Missouri 1901 Chouteau Avenue, MC 1310 St. Louis, MO 63103 (314) 554-3533 (phone) (314) 554-4014 (fax) <u>AmerenMOService@ameren.com</u>

<sup>&</sup>lt;sup>1</sup> OPC did not file comments.

James B. Lowery, Mo. Bar #40503 SMITH LEWIS, LLP P.O. Box 918 Columbia, MO 65205-0918 (T) 573-443-3141 (F) 573-442-6686 lowery@smithlewis.com

## <u>Attorneys for Union Electric Company</u> <u>d/b/a Ameren Missouri</u>

## **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 25<sup>th</sup> day of May, 2021.

<u>/s/ Paula N. Johnson</u> Paula N. Johnson