

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

In the Matter of Ameren Missouri’s Request for a)
Waiver from Tariff Sheets 146 through 150.) File No. EE-2022-0329

**AMEREN MISSOURI’S MOTION FOR EXTENSION OF RESPONSE DEADLINE AND
MOTION FOR EXPEDITED TREATMENT**

COMES NOW, Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company), and for its request for an extension of time to reply to *Public Counsel’s Response to Proposed Tariff Revisions* (“OPC Response”) and for expedited treatment of its request, states as follows:

1. On May 27, 2022, Ameren Missouri sought a waiver of its existing Emergency Energy Conservation Plan, which is reflected in tariff sheets originally adopted in the 1970s, the focus of which was primarily on coal inventory levels but that did not account for significant changes in the electric industry, including Regional Transmission Organization operations. The Commission approved the waiver through July 23, 2022. The waiver has since been extended to September 9, 2022.

2. On June 9, 2022, Ameren Missouri filed a new Emergency Energy Conservation Plan, reflected in the tariff sheets pending in this docket, which bore an effective date of July 9, 2022. The new Plan was updated to reflect current Company and market operations. The Commission ordered the Staff to file a recommendation regarding the tariff sheets by June 21, 2022. At Staff’s request, Ameren Missouri extended the effective date of the tariff sheets to August 9, 2022 to give Staff additional time for its review. The Commission then extended the deadline for Staff’s recommendation to July 21, 2022.

3. At Staff's request, on July 8, 2022 the Company made one change to the tariff sheets it submitted on June 9 by filing a substitute tariff sheet reflecting the requested change.

4. On July 11, 2022, the Staff filed its recommendation to approve the pending tariff sheets, including the substituted sheet. The Commission ordered Ameren Missouri and the Office of the Public Counsel to respond by 3:00 p.m. July 14, 2022 regarding whether they agreed that the Commission should order the tariff sheets to take effect without further responses from the parties.

5. On July 12, 2022, Public Counsel filed its Response to Order Directing Filing, indicating that it needed more time for review and objecting to the tariff sheets "becoming effective on July 24, 2022, without an opportunity to file a response by July 21, 2022."

6. On July 21, 2022, OPC filed the OPC Response and raised several issues about the proposed tariffs. Under 20 CSR 4240-2.080(13), the Company's deadline to reply to the OPC Response is August 1, 2022. The OPC Response was filed the evening of Thursday, July 21. The undersigned counsel had scheduled a meeting with Ameren Missouri personnel with whom he needed to consult to discuss the OPC Response on Monday, July 25, 2022. However, given the historic rainfall occurring in St. Louis on July 24-25, those personnel were unavailable and have been unavailable most of the week of July 24 addressing higher priorities, that is, restoration and maintenance of service to customers due to storm damage, including severe flooding.

7. The parties intend to meet and confer respecting the issues raised by the OPC Response but will need time to do so over the next couple of weeks. Those discussions may eliminate or narrow differences that may exist between the Company and OPC, and thus may significantly impact any reply to the OPC Response the Company may ultimately file.

Consequently, the Company believes it would be more productive for all parties and the Commission to delay any filing in reply to the OPC Response.

8. The undersigned counsel has consulted with Public Counsel and counsel for the Staff, both of whom consent to an extension of time to August 18, 2022 for the Company to reply to the OPC Response.

9. Consequently, the Company requests that the Commission extend the deadline to August 18, 2022 and allow the Company at that time to either reply to the OPC Response or to seek additional extensions of the waivers the Commission has granted with respect to the existing tariff, if necessary.

10. The Company requests expedited treatment of this request pursuant to 20 CSR 4240-2.080(14) so that the extension can be granted by August 1, 2022. There will be no negative impact on customers or the general public if the Commission acts on an expedited basis as it will simply preserve the status quo and is unopposed by any party. The proposed tariff is not currently slated to take effect until September 9, 2022, and the existing tariff's provisions have been waived through that date as well. This request was filed as soon as it could have been once the undersigned counsel was able to discern that additional discussions among the parties were warranted in lieu of filing a reply to the OPC Response at this time.

WHEREFORE, Ameren Missouri requests that the Commission make and enter its order extending the otherwise applicable due date, under 20 CSR 4240-2.080(13), to August 18, 2022, and allowing the Company to either file a reply to the OPC Response at that time or a request for a further extension of the existing waiver coupled with a further extension of the effective date of the proposed tariff sheets, if necessary, and for such other and further relief as the Commission deems appropriate in the circumstances.

Respectfully submitted,

/s/James B. Lowery

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**ATTORNEYS FOR UNION ELECTRIC
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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 29th day of July, 2022, to Staff and the Office of the Public Counsel.

/s/James B. Lowery