

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

In the Matter of Ameren Missouri’s)
Submission of its 2015 RES Compliance)
Report and 2016-2018 Compliance Plan.)

File No. EO-2016-0286

**MOTION TO EXTEND TIME FOR RESPONSE
AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) and the Division of Energy (“DE”), and hereby move the Commission to extend the deadline for responses to the Staff Report and comments on Ameren Missouri’s Renewable Energy Standard (“RES”) Compliance Plan for calendar years 2016 through 2018 (“RES Plan”) and RES Compliance Report for 2015 (“RES Report”) submitted in this docket on April 15, 2016. In support of their motion, the Company and DE state as follows:

1. On April 15, 2016, Ameren Missouri submitted its RES Plan and RES Report.
2. On May 27, 2016, and June 24, 2016, Earth Island Institute d/b/a Renew Missouri (“Renew Missouri”) and the Missouri Department of Economic Development – Division of Energy (“DE”), respectively, filed comments on the RES Plan and RES Report. On May 31, 2016, United for Missouri filed comments on the RES Plan and RES Report. Also on June 24, 2016, the Missouri Public Service Commission Staff (“Staff”) filed its own Report regarding the RES Plan and RES Report.
3. On June 27, 2016, the Presiding Officer, by delegation, issued an *Order Establishing Time to Respond to Staff Report and Stakeholder Comments* under which responses are due this Friday, July 8, 2016. Under the Order, the Company may file responses to the Staff report and stakeholder comments, and others may file responses to DE’s comments and to the Staff report.

4. DE filed comments which indicate that DE has questions or potential concerns regarding the Company's modeling of the 1% retail rate impact ("RRI") limitation included in the RES, and that also suggested that DE was considering possible changes to its RES rules. The Company did not know of DE's issues prior to DE's filed comments, and the Company has reached out to DE to discuss its questions and concerns.

5. While the Company and DE have had a preliminary discussion, due the unavailability of key personnel for both the Company and DE who have the requisite knowledge on the pertinent topics, further discussions need to occur. DE and the Company anticipate that there will likely be multiple discussions that may span the next few weeks. Such discussions are necessary given the complexity of the issues involved, including complexities inherent in the calculation of the RRI.

6. While neither the Company nor DE can say at this time whether those discussions will resolve any of DE's questions or concerns, both the Company and DE believe the discussions are worthwhile and, at a minimum, will lead to a better understanding of any issues, and that they may lead to a resolution of some questions or concerns. In either case, the discussions will inform responses to be filed in this docket.

7. To ensure that there is sufficient time to complete those discussions in advance of the filing of responses to the Staff Report and stakeholder comments (and to avoid the need to ask for a further extension of time), the Company and DE request an extension of the time for response to July 29, 2016, and request that Presiding Officer promptly issue his order by delegation granting the extension given the current, impending deadline of this Friday, July 8. This motion was filed as soon as possible once the Company and DE determined that these discussions were likely to need to occur over the coming weeks.

8. The other entities submitting comments in this docket, the Staff, Renew Missouri and United for Missouri, have been contacted and have indicated that movants may state they do not oppose this motion.

WHEREFORE, Ameren Missouri and DE respectfully request the Presiding Officer issue, by delegation, an order extending the deadline to file responses to the Staff report and stakeholder comments on the RES Plan and RES Report to July 29, 2016.

Respectfully submitted,

/s/ James B. Lowery

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission, facsimile or email to counsel for parties in this case on this 5th day of July, 2016.

/s/ James B. Lowery