

**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 ) **FILE NO.: EA-2022-0244**  
Of Public Convenience and Necessity )  
Authorizing it to Construct a Renewable )  
Generation )

**STAFF’S MOTION TO EXTEND STAFF  
RECOMMENDATION DEADLINE**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), through the undersigned counsel, and requests a 45-day extension of its October 17, 2022, recommendation deadline to December 1, 2022.

On July 14, 2022,<sup>1</sup> the Commission issued its Order Directing Notice, Setting Intervention Deadline, Directing Staff Recommendation, and Directing Filing. Staff was ordered to file a recommendation or status report no later than August 15. On August 23, the Commission ordered Staff to file its recommendation as soon as possible, but no later than October 17.

On October 5, Ameren Missouri<sup>2</sup> and Staff met, and Ameren Missouri outlined the effect the “Inflation Reduction Act of 2022,” (“IRA”)<sup>3</sup> will have on current cases before the Commission. Ameren Missouri has requested a certificate of convenience and necessity (“CCN”). The IRA impacts both the financial feasibility Tartan factor and the economic feasibility Tartan factor and renders irrelevant Ameren Missouri’s previous data

---

<sup>1</sup> All date references will be to 2022 unless otherwise indicated.

<sup>2</sup> Union Electric Company d/b/a Ameren Missouri will be referred to as “Ameren Missouri.”

<sup>3</sup> Public Law 117-169

responses and work papers relating to these factors.<sup>4</sup> In connection with the October 5 meeting, Ameren initially provided Staff with updated work papers that were wholly different from those which Staff had been using to develop its recommendation. The new work papers, addressing the IRA effects, contained values that were hard coded with no information as to their source or what calculations may have gone into them. Subsequently, Staff and Ameren Missouri communicated further about providing the missing information. On October 14, Ameren Missouri provided some additional spreadsheets.

Because of the posture of discovery, Staff simply cannot make a CNN recommendation that addresses all Tartan factors at this time. Further, a preliminary review of the information now in hand leads Staff to believe that after full analysis it is highly likely that still further data and explanation will be required. Ameren Missouri and Staff have agreed upon a 45-day recommendation deadline extension but that Staff will file a recommendation earlier than 45 days if possible, and, indeed, as soon as possible.

**WHEREFORE**, with Ameren Missouri's agreement, Staff prays the Commission's order extending the October 17 deadline until December 1, 2022, and for such other and further relief as the Commission deems just and proper.

---

<sup>4</sup> With respect to the requests for certificates of convenience and necessity, the Commission may grant a company a CCN to operate after determining that the construction and operation are either "necessary or convenient for the public service." Section 393.170, RSMo 2016. The Commission evaluates whether a CCN application satisfies that requirement per the "Tartan" factors. See *In re Tartan Energy Company*, 3 Mo.P.S.C. 173, 177 (1994).

Respectfully submitted,

/s/ Paul T. Graham

Senior Counsel Missouri Bar No. 30416  
P. O. Box 360 Jefferson City, MO 65102  
(573) 522-8459 (Telephone)  
(573) 751-9285 (Fax)  
[Paul.graham@psc.mo](mailto:Paul.graham@psc.mo).

Attorney for the Staff of the  
Missouri Public Service Commission

**CERTIFICATE OF SERVICE**

The undersigned certifies by his signature below that on October 17, 2022, he filed the above document in the EFIS file of the Missouri Public Service Commission.

/s/ Paul T. Graham