## 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 of Public Convenience and	)	File
Necessity Authorizing it to Construct a	)	
Renewable Generation Facility.	)	

File No.: EA-2022-0244

## AMEREN MISSOURI'S REQUEST FOR AN EXTENSION OF THE 10-DAY RESPONSE DEADLINE IN 20 CSR 4240-2.080(13)

**COMES NOW** Union Electric Company d/b/a Ameren Missouri ("Company" or "Ameren Missouri"), and for its motion seeking additional time to respond to the Staff recommendation filed in this docket, states as follows:

1. Staff filed its Staff Report and Recommendation ("Staff Recommendation") regarding the certificate of convenience and necessity ("CCN") application at issue in this docket on December 1, 2022. The Staff Recommendation was to approve the application subject to 10 conditions. Under the above-referenced Commission rule, Ameren Missouri's response to the Staff Recommendation would be due on December 12, 2022.<sup>1</sup>

The Company is in discussions with Staff about some of the recommended conditions, but Staff and the Company have not had sufficient time to conclude those discussions.
The Company believes those discussions will at minimum narrow any differences that could exist as to any of those conditions, or it may eliminate them.

3. For these reasons, the Company requests that the Commission extend the due date of its response to the Staff Recommendation by one week, to December 19, 2022.

<sup>&</sup>lt;sup>1</sup> Under the subject rule, responses are due within 10 days (by December 10, 2022) but under 20 CSR 420-2.040 when a deadline falls on a Saturday, Sunday or legal holiday, the deadline is extended to the next business day, in this case December 12, 2022.

4. Counsel for all parties to this docket have indicated that their clients do not oppose this motion.

**WHEREFORE**, Ameren Missouri prays that the Commission make and enter its order extending the deadline for it to respond to the Staff Recommendation to December 19, 2022.

Respectfully submitted,

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## ATTORNEYS FOR UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

## **CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing was served on counsel for all parties of record in this case on via electronic mail (e-mail) on this 12th day of December, 2022.

<u>/s/ James B. Lowery</u> James B. Lowery