BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service

File No. ER-2022-0337 Tracking No. YE-2023-0031

SIERRA CLUB'S MOTION FOR LEAVE TO LATE FILE INITIAL POST-HEARING BRIEF

Sierra Club supports its Motion for Leave to Late File its Initial Post-Hearing Brief as follows:

1. Initial Post-Hearing Briefs in this proceeding were due on May 5, 2023.

2. On May 5, 2023, Sierra Club filed confidential and public versions of its Initial Post-Hearing Brief through the EFIS system. But because of an error in the confidential protection of the confidential version, Sierra Club asked the PSC helpdesk to delete the filing. Sierra Club consulted with Commission personnel after business hours on Friday evening and appreciates their prompt attention and assistance.

3. Sierra Club served its brief upon counsel for the parties via email.

4. Sierra Club's subsequent attempts to re-file its brief via EFIS on May 5, 2023 were not successful and resulted in an error message indicating that "An error has occurred. Helpdesk has been notified."

5. Sierra Club now moves for the late acceptance of its Initial Post-Hearing Brief.

6. Sierra Club does not believe any party will be prejudiced if the Commission grants this Motion.

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7. Sierra Club has asked the parties if they had any position on this Motion. Ameren Missouri has stated that they have no objection to the Motion. No other party stated a position at the time of this filing.

Respectfully submitted,

Date: May 8, 2023

<u>/s/ Tony Mendoza</u> Bruce Morrison, #38359 Ethan Thompson, #74226 Great Rivers Environmental Law Center 319 N. 4th St., Suite 800 St. Louis, Missouri 63102 (314) 231-4181 (314) 231-4184 Fax bamorrison@greatriverslaw.org ethompson@greatriverslaw.org

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Counsel for Sierra Club

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Sierra Club Motion for Leave to Late File Initial Post-Hearing Brief was electronically filed on this date via the Missouri PSC's electronic filing system. Notice of this filing will be served upon all parties of record who have registered through this electronic filing system.

Date: May 8, 2023

/s/ Tony Mendoza

Tony Mendoza