

**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)	<u>Case No. EA-2020-0371</u>
Permission and Approval and a Certificate of)	Tracking No. YE-2022-0259
Public Convenience and Necessity Under 20)	
CSR 4240-3.105)	

**MOTION FOR EXTENSION ON STAFF RECOMMENDATION AND
FIFTEEN-DAY SUSPENSION OF TARIFF**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and respectfully requests an extension of thirty (30) days to file its recommendation, and for a corresponding suspension of Ameren’s tariff Tracking Number YE-2022-0259,¹ and in support states the following:

1. On May 16, 2022, Union Electric Company d/b/a Ameren Missouri filed a revised tariff sheet, YE-2022-0259, to update its Solar Generation Charge and Total Solar Block Charge in its Community Solar Pilot Program to reflect the Montgomery County Energy Center. The proposed effective date of that tariff is June 16, 2022.
2. The Commission ordered Staff’s recommendation and any response or objection to be filed no later than May 27, 2022. The Commission has not suspended the operation of Ameren Missouri’s proposed tariff.
3. Ameren Missouri provided in-service information to Staff on May 26, 2022.
4. In order to allow Staff to timely review the in-service information to determine whether the Montgomery County Energy Center meets the fully operational and used for service standard in Section 393.135, RSMo (2016), and the Commission’s Order in this case, issued on March 24, 2021, which provided that “Staff and Ameren

¹ The Commission’s Order dated May 17, 2022, reflects a tracking number of JE-2022-0259; EFIS reflects a tracking number of YE-2022-0259. Staff is using the tracking number reflected in EFIS as of May 27, 2022. r

Missouri shall jointly file agreed upon in-service criteria for the Montgomery solar facility with the Commission within 90 days of granting the CCN. The filed in-service criteria will be used to evaluate whether the Community Solar Facility, once operational, meets the fully operational and used for service standard in Section 393.125, RSMo.”²

5. The parties filed agreed-upon in-service criteria on July 17, 2021.³

6. Staff will endeavor to review Ameren Missouri’s in-service information and to file Staff’s recommendation as soon as possible, but requests an extension of up to thirty (30) days. Staff’s new recommendation deadline would be no later than June 26, 2022.

7. To accommodate Staff’s review, Staff requests that the Commission suspend for fifteen (15) days Ameren Missouri’s proposed Tariff, Tracking Number YE-2022-0259 from June 16, 2022 to July 1, 2022.

8. The Commission’s authority to suspend Tariff YE-2022-0259 springs from Section 393.150, RSMo (2016), which provides that a tariff may be suspended for up to one hundred and twenty (120) days.

WHEREFORE, Staff respectfully requests the Commission grant a continuance on Staff’s recommendation by up to thirty (30) days, to June 26, 2022, and to suspend Ameren Missouri’s proposed Tariff YE-2022-0259 from June 16, 2022, to July 1, 2022, and for such other and further relief the Commission deems just and reasonable under the circumstances.

² *Order Approving Stipulation and Agreement and Granting Certificate of Convenience and Necessity*, Case No. EA-2020-0371, EFIS Document Number 19, page 6, paragraph 3.c. (March 24, 2021).

³ *Ameren Missouri’s Notice of Compliance with Conditions a and c from Commission’s CCN Order*, Case No. EA-2020-0371, EFIS Document Number 25 (July 16, 2021).

Respectfully submitted,

/s/ Curt Stokes

Curt Stokes

Chief Deputy Counsel

Mo. Bar No. 59836

P.O. Box 360

Jefferson City, MO 65102

(573) 751-4227 (Telephone)

(573) 751-9285 (Facsimile)

Curtis.Stokes@psc.mo.gov

**Counsel for Staff of the Missouri Public
Service Commission**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 27th day of May, 2022, to all parties and/or counsels of records.

/s/ Curt Stokes

Curt Stokes