

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

In the Matter of the Establishment of a Working)	
Case for the Review and Consideration of)	File No. EW-2020-0377
Amending the Commission’s Rule on Electric)	
Utility Renewable Energy Standard Requirements.)	

**JOINT REQUEST TO EXTEND TIME FOR
FILING COMMENTS ON DRAFT AMENDMENT**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”), Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (collectively, “Evergy”), and The Empire District Electric Company d/b/a Liberty (“Liberty”) and request an extension of time to file comments on Staff’s draft amendment to July 30, 2021. In support of their request, Ameren Missouri, Evergy, and Liberty state as follows:

1. The Commission opened this docket in May 2020 based on Staff’s request (made May 20, 2020) to establish a working docket to examine the Commission’s Renewable Energy Standard (“RES”) rule. Staff indicated that a working docket should be opened because of “several issues” with the current rule which Staff stated, “may or may not become problematic.” Staff’s motion raised four such issues and proposed, in general terms, four possible solutions to them. Staff’s motion also suggested that the docket should consider “any additional issues with the current Rule, along with potential solutions, identified by the commenters.” Staff did not propose any specific language on the issues it identified.

2. In accordance with the Commission’s order opening the docket, on June 29, 2020, Ameren Missouri and Evergy timely filed comments on the general issues raised by Staff and suggested a few other issues to be considered in any re-examination of the RES rule. The other commenters at the time were Sierra Club and the Office of the Public Counsel. No further action

was taken in the docket until Staff, nearly a year later, filed its May 26, 2021 Motion for Comments on Proposed Rule Amendments, in which Staff requested a Commission order inviting comments on its specific redraft of the existing rule within 30 days of the issuance of the order. The Commission issued such an order on June 2, 2021 and set a deadline for comments of July 2, 2021.

3. Ameren Missouri, Evergy, and Liberty intend to carefully consider the Staff redraft of the rule and to provide specific comments and suggestions to facilitate a meaningful review of the RES rule and how it can be improved. However, the rule, which covers approximately 25 pages, is complex and extensive. Various aspects of the existing rule and Staff's redraft touch multiple areas across the utility and involve many different utility personnel. Moreover, Staff is proposing changes to the rule that by Ameren Missouri's, Evergy's, and Liberty's reading of Staff's initial filing that initiated this docket, are not within the issues Staff first listed in May, 2020, and in some cases were not suggested by any commenter. Consequently, Ameren Missouri, Evergy, and Liberty are considering these additional topics for the first time.

4. Given the breadth and complexity of the RES rule, the extensiveness of the proposed amendments reflected in Staff's redraft, the new issues the redraft raises, and the need to consider whether changes not yet proposed by Staff should also be considered, Ameren Missouri, Evergy, and Liberty need additional time for review and consideration of the redraft, including to coordinate with multiple employees and to then meaningfully provide thoughtful, specific comments and suggestions on the redraft. Consequently, Ameren Missouri, Evergy, and Liberty request a 28-day extension, to July 30, 2021, to provide their comments.

5. The undersigned counsel have contacted Staff counsel who has authorized them to indicate that Staff does not oppose the extension request.

WHEREFORE, Ameren Missouri, Evergy, and Liberty hereby request an extension of time to file comments to July 30, 2021.

Respectfully submitted,

/s/ James B. Lowery

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served on all parties of record via electronic mail (e-mail) on this 4th day of June, 2020.

/s/James B. Lowery
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