

**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 an)	
Order Authorizing the Issue and Sale of Up to)	<u>File No. EF-2018-0213</u>
\$425,000,000 Aggregate Principal Amount)	
of Additional Long-term Indebtedness)	

STAFF REQUEST FOR ADDITIONAL TIME TO FILE RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission, through Staff Counsel's Office, in response to the Commission's February 5, 2018, Order Directing Staff To File Recommendation no later than February 26, 2018, respecting the February 1, 2018, filing of a financing Application by Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") for authority to issue and sell up to \$425 million aggregate principal amount of additional long-term indebtedness ("New Indebtedness") and requests additional time to file its Memorandum Recommendation with the Commission from February 26, 2018 to no later than March 9, 2018. In support thereof, the Staff states as follows:

1. On pages 5-6, in paragraph 9 of Ameren Missouri's Application, the Application states that no later than March 2, 2018, Ameren Missouri will file with the Commission its January 31, 2018 financial statements, (with pro forma adjustments consistent with the proposed transactions described in paragraph 4¹ of its Application) as specified in 4 CSR 240-3.120(1)(E) and 4 CSR 240-3.220(1)(E), and the

¹ Paragraph 4 of Ameren Missouri's Application states in part that Applicant proposes to use the proceeds from the issuance and sale of the New Indebtedness to pay shortly after maturity short-term debt incurred as a result of paying at maturity, \$178.52 million principal amount of the Applicant's 6.25% Senior Secured Notes due April 1, 2018, and (2) to refinance other short-term debt consisting of commercial paper borrowings and potentially money pool borrowings.

January 31, 2018 capitalization ratios of Applicant, including such ratios with pro forma adjustments.

2. It was the intention of the Financial Analysis Unit of the Staff and Staff's intention was made known to the Applicant, to file its recommendation with the Commission, no later than March 9, 2018, approximately a week after the Applicant's filing, no later than March 2, 2018, addressed in paragraph 9 of its Application.

3. The Staff does not request this additional time to file its recommendation to unduly delay these proceedings or inconvenience the Commission. Counsel for the Staff has contacted Counsel for Ameren Missouri and has advised that the Staff would be filing this Staff Request For Additional Time To File Recommendation. Counsel for Ameren Missouri has authorized counsel for Staff to indicate that Ameren Missouri does not oppose the Staff's request for additional time.

WHEREFORE the Staff requests additional time to file its Memorandum Recommendation with the Commission from February 26, 2018 to no later than March 9, 2018, one week after Ameren Missouri will file with the Commission, no later than March 2, 2018, its January 31, 2018 financial statements (with pro forma adjustments consistent with the proposed transactions described in paragraph 4 of its Application) and the January 31, 2018 capitalization ratios of Applicant, including such ratios with pro forma adjustments.

Respectfully submitted,

/s/ Steven Dottheim

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail on counsel for the parties of record to this case, on this 21st day of February, 2018.

/s/ Steven Dottheim