## 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 Borrowing of Up to \$800,000,000 Aggregate	)	File No. EF-2014-0094
Principal Amount Under a Long-Term Credit Facility	)	

## STAFF MOTION FOR EXTENSION OF TIME TO FILE ITS RECOMMENDATION

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff"), by and through undersigned counsel of the Staff Counsel's Office, and files in File No. EF-2014-0094 *Staff Motion For Extension Of Time To File Its Recommendation* requesting an extension to January 16, 2014 from December 20, 2013. In support thereof, the Staff states as follows:

- 1. On October 15, 2013, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed an Application for permission and authority, under Sections 393.180 and 393.200 RSMo. 2000, 4 CSR 240-3.120 and 4 CSR 240-2.060 to incur up to \$800.000,000 aggregate principal amount of new borrowings under a long-term credit facility under its 2012 Missouri Credit Agreement.
- 2. On October 16, 2013, the Missouri Public Service Commission ("Commission") issued an *Order Directing Staff To File A Pleading Stating When It Will File A Recommendation In This Case*.
- 3. In Paragraph 18 of its pleading entitled "Application" filed on October 15, 2013 Ameren Missouri stated that it requests the Commission approve this Application so that it is effective no later than March 31, 2014.
- 4. On October 16, 2013, the Commission directed the Staff to inform the Commission of when it would be able to file a recommendation. On October 25, 2013, the Staff in a filing indicated that it anticipated filing its recommendation no later than December 20,

2013. In a November 5, 2013 *Order Directing Staff To File A Recommendation*, the Commission directed the Staff to file its recommendation regarding Ameren Missouri's Application no later than December 20, 2013.

5. The Staff has worked diligently to meet the December 20, 2013 filing deadline, engaging in communications and data / information transmittal with Ameren Missouri as recently as several times within the last two weeks. Nonetheless, the Staff needs additional time to complete its review. Therefore, Staff seeks additional time to January 16, 2014 to file its recommendation.

6. Counsel for Ameren Missouri has advised undersigned Staff counsel that he may indicate that Ameren Missouri has no objection to the Staff's request for additional time to file the Staff's recommendation.

7. The Staff does not make its request to unduly delay the instant proceeding or vex the Commission.

**WHEREFORE**, the Staff files the instant *Staff Motion For Extension Of Time To File Its Recommendation* requesting that the Commission grant an extension of time for the Staff to file its recommendation in the instant proceeding to January 16, 2014 from December 20, 2013.

Respectfully submitted,

## /s/ Steven Dottheim

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## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing *Staff Motion For Extension Of Time To File Its Recommendation* have been transmitted electronically to all counsel of record this 20<sup>th</sup> day of December, 2013.

/s/ Steven Dottheim