

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Filing of the)
Renewable Energy Standard Compliance)
Plan for 2023-2025) **File No. EO-2023-0359**

STAFF'S REQUEST FOR EXTENSION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff), by and through counsel and requests a 30 day extension of the deadline for filing Staff's report, stating further:

1. On April 14, 2023, Union Electric Company d/b/a Ameren Missouri ("Ameren" or "Company") filed its 2022 Renewable Energy Standard (RES) Compliance Report and RES Compliance Plan for calendar years 2023 through 2025, as required by Commission Rule 20 CSR 4240-20.100(8).

2. On April 17, 2023, the Commission issued an *Order Directing Notice of Filing*. The Commission directed Staff to examine Ameren's annual RES Compliance Report and RES Compliance Plan. The Commission also directed Staff to submit a report by Tuesday, May 30, 2023. Commission Rule 20 CSR 4240-20.100(8) requires Staff to review the RES Compliance Report and Plan and file a report of its review with the Commission within 45 days of the date of filing.¹

3. In its response to Staff's Data Request 0002, the Company confirmed its intention to request a variance from 20 CSR 4240-20.100(8). Staff requires additional

¹ 20 CSR 4240-20.100(8)(D)

information for its report that will be included in Ameren's request. Staff anticipates completing its discovery and analysis and will be able to file its report by June 29, 2023.

4. The undersigned counsel contacted the Company's counsel asking whether they object to this request. The Company's counsel stated that they do not oppose this request.

WHEREFORE, Staff respectfully requests for an order granting Staff an additional 30 days within which to review Ameren Missouri's RES compliance report and plan and file a report of its review with the Commission; and for such other and further relief and orders as the Commission may deem necessary or appropriate.

Respectfully submitted,

/s/ Eric Vandergriff

Eric Vandergriff

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 30th day of May, 2023.

/s/ Eric Vandergriff