## 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 Authority to	)	File No. EO-2012-0158
Exchange SO <sub>2</sub> Emissions Allowances for NO <sub>X</sub>	)	
Emissions Allowances.	)	

## STAFF'S MOTION FOR MORE TIME TO FILE RECOMMENDATION

**COMES NOW** the Staff of the Missouri Public Service Commission and requests the Commission grant it more time to file a recommendation based on the grounds following:

- 1. On November 22, 2011, Ameren Missouri filed its application in this matter. The Commission ordered Staff to file a recommendation regarding its examination and analysis of Ameren Missouri's application by December 5, 2011. Due to the need for more information from Ameren Missouri and the ongoing exchanges between Staff and Ameren Missouri, Staff requested additional time to file its recommendation. On December 5, 2011, the Commission issued an order directing its Staff to file a recommendation by December 20, 2011.
- 2. On December 8, 2011, Staff issued a data request to Ameren Missouri, to which Ameren Missouri responded on December 15, 2011. Because this response has just been received, and because of the uniqueness of the accounting treatment requested in Ameren Missouri's application, as clarified in that response, which is not based on an extraordinary event, Staff is requesting more time to complete its recommendation. Staff should be ready to file its recommendation by Tuesday, December 27, 2011.
- 3. Staff will not unnecessarily delay making its recommendation. Furthermore, as noted in Staff's previous request for additional time, based on what Staff understands of Ameren Missouri's timeline for the transaction at issue, a one-week delay of Staff's recommendation will prejudice neither Ameren Missouri nor consummation of the transaction.

WHEREFORE, Staff moves the Commission to grant it until Tuesday, December 27,

2011, to file its recommendation on Ameren Missouri's application.

Respectfully submitted,

## /s/ Nathan Williams

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Attorney for Staff of the Missouri Public Service Commission

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 20th day of December, 2011.

/s/ Nathan Williams