

**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 Sell)
or Transfer a Portion of its Franchise, Works, or)
System to SSM HEALTH, INC. d/b/a SSM Health)
Saint Louis University Hospital)

File No. EO-2019-0391

**STAFF’S MOTION FOR A FURTHER EXTENSION OF TIME
TO AUGUST 2, 2019 TO FILE STAFF RECOMMENDATION**

COMES NOW, the Staff of the Missouri Public Service Commission (“Staff”), and files *Staff’s Motion for A Further Extension of Time to August 2, 2019 to File Staff Recommendation* regarding the application of Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) for authority to sell, transfer, and otherwise dispose of a portion of its franchise, works, or system to SSM HEALTH, INC. d/b/a SSM Health Saint Louis University Hospital (“SSM Health”). In support, Staff states as follows:

1. On June 13, 2019, Ameren Missouri filed an *Application and Request for Waiver and Motion for Expedited Treatment* (“Application”) seeking authority to sell, transfer, and otherwise dispose of a portion of its franchise, works, or system, namely a transformer, to SSM Health. Ameren Missouri also requests a variance from the 60-day notice requirement of 4 CSR 240-4.017, pursuant to 4 CSR 240-4.017(1)(D).

2. On June 14, the Commission issued its *Order Providing Notice and Directing Staff Recommendation* (“Order”) directing Staff to file a recommendation by July 3, 2019. The Order also states that “[i]f Staff finds that it cannot reasonably file a recommendation by that date, it may file a request for additional time, indicating when it can file a recommendation.”

3. On June 26, 2019 Staff filed Staff's *Motion for Additional Time to July 23, 2019 to File Staff Recommendation*. In this motion, Staff stated that additional time was needed to receive responses to data requests and complete Staff's recommendation. The Commission granted this motion June 27, 2019.

4. On July 17, 2019 Ameren Missouri filed its *Amended Application and Request for Waiver and Motion for Expedited Treatment* ("Amended Application") to correct the transformer's sale price. The sale price in the Amended Application reflects the price in the Bill of Sale attached to the Application. Ameren Missouri stated in its Amended Application that income taxes were inadvertently omitted in the Application;¹ these taxes are now included in the Amended Application. Ameren Missouri again requested expedited treatment.

5. Staff has questions about Ameren Missouri's income tax calculations associated with the proposed asset sale, as well as the proposed journal entries to record the proceeds that Ameren Missouri would receive as a result of the sale. These questions arose from Ameren Missouri's revised data request responses, which Ameren Missouri submitted contemporaneously with its Amended Application. Staff hopes to meet with Ameren Missouri's accounting personnel soon for further discussion and clarification.

6. Therefore, to allow additional time for Staff and Ameren Missouri to discuss the income tax calculations and journal entries, and additional time thereafter for Staff to finalize its recommendation, Staff requests a further extension of the due date for Staff's recommendation – currently due July 23, 2019 – to August 2, 2019.

¹ *Amended Application and Request for Waiver and Motion for Expedited Treatment* 1, EO-2019-0391 (July 17, 2019).

7. Staff notes that once Staff and Ameren Missouri clarify the income tax and journal entries issues, Staff will file its recommendation as soon as practicable.

8. Staff has authority to state that Ameren Missouri does not oppose this motion.

WHEREFORE, for the reasons previously stated, Staff respectfully requests the Commission grant the requested extension and order Staff to file its recommendation no later than August 2, 2019.

Respectfully submitted,

/s/ Karen E. Bretz

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been electronically mailed to all parties and/or counsel of record on this 22nd day of July, 2019.

/s/ Karen E. Bretz