

**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 ADDITIONAL TIME TO JULY 23, 2019  
TO FILE STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through Staff Counsel’s Office, and hereby files Staff’s Motion for Additional Time to July 23, 2019 to File Staff Recommendation regarding 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. In support thereof, Staff states as follows:

1. On June 13, 2019, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed an Application and Request for Waiver and Motion for Expedited Treatment establishing File No. EO-2019-0391. Ameren Missouri seeks 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 ST. LOUIS UNIVERSITY HOSPITAL and 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, 2019, the Commission issued an Order Providing Notice and Directing Staff Recommendation (“Order”). The Commission in “Order” item “2.” directs Staff to file a recommendation no later than July 3, 2019. The Commission’s 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. Pursuant to 4 CSR 240-2.080(14), Ameren Missouri requests expedited treatment, i.e., approval of the sale and variance by Commission Order no later than July 12, 2019. Ameren Missouri asserts at page 7, paragraph 15:

. . . SSM Health has plans for construction on or around its property that will involve the transformer. Granting this application approval in advance of that date [July 12, 2019] will avoid potential construction issues regarding the transformer's ownership. This *Application* could not be completed more quickly because the Company was unable to finalize the particulars of this deal sooner.

4. On June 24, 2019, Staff submitted seven (7) Data Requests to Ameren Missouri. Based on the twenty (20) days permitted for response to data requests by Commission Rule 4 CSR 240-2.090(2)(C) the amount of time needed for Staff to process the responses and develop and file a Staff recommendation, assuming the full 20-day response time and no need for additional information or clarification from Staff, Staff should be able to file its recommendation by July 23, 2019. If Staff is able to file earlier, it will do so. Staff would note that the same Staff which is working this case is working Ameren Missouri's pending general gas rate increase case, which has several important due dates scheduled for July 10-12, 2019.

5. Staff counsel has advised Ameren Missouri counsel of the foregoing matters. Ameren Missouri counsel has indicated to Staff counsel that responses to Staff Data Requests are being worked on.

**WHEREFORE** Staff hereby files its Motion for Additional Time to July 23, 2019 to File Staff Recommendation regarding 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.

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 26th day of June, 2019.

**/s/ Karen E. Bretz**