

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

In the Matter of the Renewable Energy)
Standard Compliance Report 2013 and)
Renewable Energy Standard Compliance)
Plan 2014-2016)
File No. EO-2014-0291

MOTION FOR EXTENSION OF TIME TO FILE STAFF’S REPORTS

COMES NOW, Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and files this *Motion for Extension of Time to File Staff’s Reports* respectfully requesting the Missouri Public Service Commission grant its *Motion* extending the date for filing Staff’s Reports in this proceeding from May 30, 2014 to June 30, 2014. In support of this motion, Staff states as follows:

1. On April 15, 2014, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed its *Renewable Energy Standard Compliance Report 2013 and Renewable Energy Standard Compliance Plan 2014-2016*.
2. On April 17, 2014, the Commission issued its *Order Directing Notice and Setting Filing Deadline* directing Staff to file a report of its review of Ameren Missouri's filings in this matter by no later than May 30, 2014.
3. Commission Rule 4 CSR 240-20.100(7)(D) states “the staff of the commission shall examine each electric utility’s annual RES compliance report and RES compliance plan and file a report of its review with the commission within forty-five days of the filing...”

4. However, Commission Rule 4 CSR 240-20.100(10) allows the Commission to waive or grant a variance from this forty-five day requirement placed upon Staff for good cause shown. Good cause has been defined as a "...substantial reason or cause which would cause or justify the ordinary person to neglect one of his [legal] duties."¹

5. Due to a key Staff member's maternity leave, press of other business and Staff's continuing review and analysis of Ameren Missouri's filed 2013 RES Compliance Report and 2014-2016 RES Compliance Plan good cause exists for Staff to receive an extension of time to file its reports. An extension will ensure that Staff provides the Commission with thorough reports regarding Ameren Missouri's filings. Therefore, Staff is requesting from the Commission an extension of time to file its reports regarding Ameren Missouri's 2013 RES Compliance Report and 2014-2016 RES Compliance Plan filings until June 30, 2014.

6. Rule 4 CSR 240-20.100 (7)(E) allows interested persons or entities to file comments to a utility's RES compliance plan or report within forty-five days of the utility's filings. Staff recommends the Commission also extend the filing of responses by persons or entities under paragraph (7)(E) to no later than June 30, 2014, for those that may also prefer to file their comments after May 30, 2014.

7. Staff has contacted the parties in the case, and they do not object to Staff's Motion.

¹ *Graham v. State*, 134 N.W. 249, 250 (Neb. 1912).

WHEREFORE, Staff files this *Motion for Extension of Time To File Staff's Reports* and requests the Commission grant it and any other interested persons or entities an extension until June 30, 2014 to file its reports.

Respectfully submitted,

/s/ Alexander Antal

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served to all counsel of record by hand delivery, electronic mail or First Class United States Mail this 28th day of May, 2014.

/s/ Alexander Antal