

**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)
An Order Authorizing the Issue and Sale of)
Additional Long-Term Indebtedness) **File No. EF-2022-0164**

**STAFF INITIAL RESPONSE TO ORDER DIRECTING STAFF TO FILE
RECOMMENDATION ON FINANCING COMPLIANCE**

COMES NOW Staff of the Missouri Public Service Commission and for its initial response to the Commission’s *Order Directing Staff to File Recommendation on Financing Compliance* issued herein on May 4, 2022, respectfully states as follows:

1. On April 29, 2022, Ameren Missouri filed a Notice of Filing Compliance Items, along with certain items purported to be in compliance with the enumerated conditions of the Commission’s March 9, 2022, *Order Approving Application for Financing Authority*.

2. On May 4, 2022, the Commission issued its *Order Directing Staff to File Recommendation on Financing Compliance* (“Order”) in which the Commission directed Staff to file, no later than May 13, 2022, a recommendation as to (1) whether the information in Ameren Missouri’s Notice of Filing Compliance Items and the accompanying attachments comply with the Commission’s *Order Approving Application for Financing Authority* and (2) whether this file is ready to be closed.

3. Staff has questions regarding the material submitted by Ameren Missouri as its “compliance filing” as it relates to the conditions contained in the Commission’s *Order Approving Application for Financing Authority* and has submitted data requests to Ameren Missouri to hopefully resolve those questions. However, Ameren Missouri’s responses to those data requests are not due until after the due date for

Staff's recommendation as currently ordered; furthermore, even if the responses were received immediately, Staff would need time to analyze and review such responses and possibly seek further clarification.

4. Given the foregoing, Staff can say that this file should not be closed at this time. In addition, Staff requests a month's extension from May 13, 2022 to June 13, 2022, to file either a recommendation as directed in the Commission's Order issued on May 4, 2022, or a status report.

WHEREFORE, Staff requests that this file remain open for the time being and that the Commission issue an order granting Staff until June 13, 2022, to file either a recommendation as directed in the Commission's Order issued on May 4, 2022, or a status report.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 11th day of May 2022.

/s/ Jeffrey A. Keevil