# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of 2017 Green Tariff

<u>File No. ET-2018-0063</u> Tracking No. YE-2018-0064

## JOINT MOTION FOR EXTENSION OF TIME TO FILE RECOMMENDATIONS

COME NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), the Staff of the Missouri Public Service Commission ("Staff"), the Office of the Public Counsel ("OPC"), the Missouri Department of Economic Development – Division of Energy ("DE"), Wal-Mart Stores, Inc. ("Wal-Mart"), the Missouri Industrial Energy Consumers ("MIEC"), Wind on the Wires ("WOW"), the Natural Resources Defense Council ("NRDC"), the Sierra Club ("Sierra Club"), Renew Missouri Advocates d/b/a Renew Missouri ("Renew Missouri"), Kansas City Power & Light Company ("KCP&L"), and KCPL – Greater Missouri Operations Company ("KCPL-GMO") (collectively, "Movants"), and hereby request that the Commission grant the Staff and interested parties an extension of time to February 26, 2018, to file recommendations or comments regarding Ameren Missouri's application and associated tariff filing. In support, Movants state as follows:

1. On November 27, 2017, Ameren Missouri filed an application requesting the Commission approve a tariff authorizing its Renewable Choice Program, which is a new service in which qualifying customers can elect to participate in a subscription-based renewable energy program. The same day the Commission issued its *Notice of Tariff Filing And Order Establishing Time to Intervene and File Recommendations* directing the Staff, and any interested party, to file recommendations regarding the application and tariff no later than January 5, 2018.

2. On January 4, 2018, the Company and the Staff filed a joint motion seeking an extension of time to February 5, 2018, for Staff to file its recommendation and an extension of

time for other parties to file comments on the Company's filing. That joint motion was granted by the Commission on January 5, 2018. Thereafter, the Company extended the effective date of the tariff sheets at issue in this case to February 24, 2018.

3. The Company, the Staff, OPC, and the other parties continue to engage in productive discussions regarding the issues raised by the Company's application in this case. Most recently, all parties met to discuss the terms of a possible total or partial resolution of this docket on February 2, 2018.

4. As a result of the February 2, 2018, discussion, Movants agreed that more time is needed to continue their discussions in an effort to resolve this docket prior to the Staff filing a recommendation, and prior to interested parties filing comments if they desire to do so. Based on the progress of current discussions, the parties believe it may be possible to agree upon a stipulation and agreement resolving some or all the issues in this docket. Accordingly, Movants agreed to request an extension of time to February 26, 2018 for the filing of a Staff recommendation and any comments other parties desire to file, a stipulation and agreement, or an additional filing respecting the further processing of the Company's application. As well, Ameren Missouri will further extend the effective date of its tariff an additional 30 days from February 24, 2018 to March 26, 2018.

**WHEREFORE**, Movants pray the Commission grant the Staff an extension of time to file its recommendation, and for any other party desiring to do so to file comments, no later than February 26, 2018.

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# **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served electronically on this 5<sup>th</sup> day of February, 2018 to counsel for the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

<u>/s/ James B. Lowery</u> James B. Lowery