

**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 Authorization	)	<b><u>File No. EO-2015-0320</u></b>
to Manage Sulfur Dioxide Emission	)	
Allowance Inventory <sup>1</sup>	)	

**MOTION FOR EXTENSION OF TIME**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion for Extension of Time* in this matter hereby states:

1. On June 2, 2015, Union Electric Company d/b/a Ameren Missouri filed its *Application for Authorization to Manage its Sulfur Dioxide Emission and Nitrogen Oxide Allowance Inventory*. By its *Order Establishing Time to Respond* June 3, 2015, the Commission ordered Staff to file its recommendation on Ameren Missouri's application by no later than July 6, 2015.

2. Staff commenced review of the application and met with Ameren Missouri by telephone conference June 22, 2015. As a product of the conference, Ameren Missouri agreed to provide Staff with further information and documentation related to its application as soon as the information can be gathered. Upon receipt of this information, additional meetings and information may be required.

3. During the telephone conference Staff spoke with Ameren Missouri about extending the time for Staff to file its recommendation due to workload; including the hearing and briefing in Case No. ER-2014-0370, continued settlement discussions and the July hearing in Case No. EO-2015-0055; as well as the upcoming Independence

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<sup>1</sup> Note that Ameren Missouri in its *Application* also requests authority to manage its nitrogen oxide allowance inventory.

Day holiday. Ameren Missouri suggested an extension to the end of July would be acceptable to it.

**WHEREFORE**, Staff requests that the Commission issue an order extending the date of filing for Staff's Recommendation to no later than July 31, 2015; and grants such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

**/s/ Whitney Payne**  
Whitney Payne  
Legal Counsel  
Missouri Bar No. 64078

Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-8706 (Telephone)  
(573) 751-9285 (Fax)  
[whitney.payne@psc.mo.gov](mailto:whitney.payne@psc.mo.gov)

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 24th day of June, 2015, to all counsel of record.

**/s/ Whitney Payne**